

#63 Please see response # 53. Major additions to the Los Trancos facility are not included in the priority phases of the *PPUP* implementation. Such facilities could be incorporated at Los Trancos (with a corresponding loss of parking spaces) but the demand will be monitored over time.

The Wish List

We would like to suggest that new facilities at Los Trancos should be added to work in conjunction with the Crystal Cove Historic District.

A small theater (75 seats) is proposed. A short film could be produced to introduce visitors to Crystal Cove State Park. The short film could include a variety of information on the area prior to entry into the "Historic District". The film could inform the public and overnight guests about the history of the area, the types and locations of facilities as well as guidelines for use of the area. A small theater could also be used to highlight information on current projects taking place at Crystal Cove State Park and could also be used for community meetings and presentations.

Guest orientation and check in station

The preliminary check in process could take place at Los Trancos eliminating the need for automobiles to be taken to the ocean side of Coast Highway. This would also reduce the number of additional parking spaces needed in the "Historic District". There could be another small check in station within the CCHD for late arrivals (possibly #18 since this cottage already has parking and a bluff top location with its separate road access).

As the number of guests to the area increases there may be a need for a sign-up area for tours and other programs being held within the CCHD.

A non-profit shop, which could sell miscellaneous items and supplies including books, memorabilia, cards, film, T-shirts, and artwork, produced at Crystal Cove. Understanding that there is a need and an opportunity for some retail (non-profit) sales it is also very important to keep the Historic District as historically pure and as commercially untainted as possible. Items sold in the historic district should be indicative of the time period of significance.

Crystal Cove Archives and Museum for valuable historic photographs and information needing secure archival conditions. This area could include displays for historic artifacts and illustrations. A variety of information could be housed here from Native American Indians to movies, photographs, stories and artwork. The currently proposed location for the archives is in the flood plain.

Park operation and maintenance offices could be located at Los Trancos keeping the use of valuable space within the CCHD for public programs. Perhaps some of the garage space could be used for equipment and materials.

Thank you for your consideration of our comments! We look forward to your response.

Sincerely,

Meriam Braselle

Meriam Braselle

#64 Thank you for your support.



November 22, 2002

California State Parks
Southern Service Center
Attention: Tina Robinson
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Subject: Crystal Cove Historic District

Dear Ms. Robinson:

The purpose of this letter is to register the support of the Ocean Institute for The Crystal Cove Historical District Preservation and Public Use Plan.

64

The Ocean Institute is particularly supportive of the intent to develop opportunities for interactive learning at Crystal Cove. The management of the Institute has met with management from the Department of Parks and Recreation and as a result we have a thorough understanding of the educational goals. Since the goals of Crystal Cove, with respect to education, are identical to those of the Institute, we have offered our unconditional assistance in this area to help develop appropriate educational programs for Crystal Cove.

Please add the Ocean Institute to your mailing list so that we may continue to be informed.

Yours truly,

Dan Gee
President

Please note that the attachments to Dennis L. Kelley's letter are in Appendix A.

65. Please see response #24. We agree that the study of dolphins should be included as a valuable, important, and desirable part of the Crystal Cove Historic District adaptive use program. Due to the number of competing and worthwhile adaptive uses for the Crystal Cove cottages, shared use of cottages and facilities will be essential to the flexibility needed to provide opportunities for the many proposals and programs that are appropriate to Crystal Cove. The *PPUP* considers the study of marine mammals to be one program that would share in the use of the public and flexible use facilities proposed for Crystal Cove and the underwater park study program.

Providing a permanent home for a dolphin study organization would be considered an exclusive use. Exclusive use was a primary criticism and reason for public opposition causing cancellation of the previous Crystal Cove concession proposal. A primary *PPUP* objective is to provide broad public access/use and avoid exclusive uses. Overnight accommodations will be the primary adaptive use within the Historic District. It is a use that will serve the broadest public and provide a unique visitor experience that is most directly related to the original reason that Crystal Cove and its cottages were created...overnight accommodations for coastal recreation and enjoyment.

Additionally, the *PPUP* and EIR have complied with the requirements of the project as proposed under CEQA statutes and guidelines. State Parks is very aware of your concerns and studies regarding the coastal bottlenose dolphins and will comply with the National Marine Mammal Protection Act and CEQA as regards potential effects to the dolphin and all other wildlife within and adjacent to the Historic District caused by implementation of the *PPUP*. Implementation of the project is land-based and the potential affects to wildlife in the underwater park, including the coastal bottlenosed dolphin, are addressed in Sections 3.8.5 and 4.2.5.



ORANGE COAST COLLEGE

2701 Fairview Rd., P.O. Box 5005, Costa Mesa, CA 92628-5005 • orangecoastcollege.com • Margaret A. Gratton, President

October 23, 2002

**Tina Robinson, Environmental Coordinator
Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA. 92108**

**Subject: Crystal Cove Historic District Preservation and Public Use
Plan – Draft Environmental Impact Report – Crystal Cove
State Park – General Plan Amendment
SCH #2002021112, October 2002**

Dear Ms. Robinson,

I have just completed reviewing the publication listed above as well as the Crystal Cove State Park General Plan Amendment – Preliminary, October 2002. I was disappointed in both their contents, with regard to the coastal bottlenose dolphin that frequent Crystal Cove State Park.

I have the following comments:

65

- 1. Please review the attached letter I wrote to Kenneth Mitchell of your agency date January 2, 1996 (document #1) detailing my concerns for the coastal bottlenose dolphin that utilize Crystal Cove. Also, please read the attached scientific publication (document #2) that I included with my letter to Kenneth Mitchell on January 2, 1996.**

#66 Please refer to the *PPUP*, pages 34-35, 64-66, 68-69, 72-74, 77 as well as Sections 3.8.5 and 4.2.5 of the EIR. The dolphins were not specifically identified but all marine mammals and the underwater park, including research for the underwater park were specifically addressed. No single use is called out in the *PPUP CARE* program but rather the type of program proposed. It is anticipated that dolphin research could be conducted as well as other local marine environment research with the parameters of the program.

- 65
2. Please, additionally, review the attached letter back to me, written February 13, 1996 and written by Jack B. Roggenbuck, District Superintendent, Orange Coast District (document #3).
 3. If you will also review the attached response to my concerns about the coastal dolphins that was written by Dr. Jeffery Graham (a Scripps Institution of Oceanography "Shark" biologist), on behalf of the Irvine Community Development Corporation (document #4), and my written response and rebuttal of Dr. Jeffery Grahams statements (written to Teresa Henry) in his report (document #5); you will have an even better idea of why I am, to say the least, disappointed in both the DEIR and the Crystal Cove State Park General Plan Amendment, Preliminary, October 2002.
 4. Finally, please review the two scientific articles I have also included (one from Marine Mammal Science – April 1999 (document #6) and the second presented as a poster paper at the American Cetacean Society Conference in Monterey California in Nov 2000 and submitted to the American Cetacean Society Whale Watcher Journal in 2000 for publication (document #7)).

I have the following questions concerning the DEIR and the Crystal Cove State Park General Plan Amendment, Preliminary, October 2002.

66

As far as I can tell from reading the Crystal Cove State Park General Plan Amendment, Preliminary, October 2002, the coastal bottlenose dolphin are left completely out of the Crystal Cove Historic District Preservation and Public Use Plan. That is, unless, one considers the photograph of a wooden cut out on the wall of a cottage on page 77 as a significant consideration with regard to the dolphins. My question is: What would it take to get the dolphins into this document?

67

As far as I can tell from reading the DEIR SCH #2002021112, the dolphins are left out of both statements of potential impacts to the dolphins and statements of possible mitigation for these potential impacts, in the Marine and Shore Habitat section beginning on page 58. The dolphins are included earlier, due to a very short paragraph on page 7 and a reference to one of the papers I submitted on page 81.

67. State and Federally listed threatened or endangered species that are known or may potentially occur within the project area are identified in the environmental effects and mitigation section of the DEIR. Although the bottlenose dolphin is not a State or Federally listed species, State Parks recognizes the value of all marine resources and addresses monitoring and potential management actions for marine resources in Section 4.2.5. All project activities will occur on land within the Historic District's project area. Although there may be an increase in visitation to the Historic District, State Parks does not anticipate a significant increase in offshore recreation (SCUBA/skin diving, etc.). State Parks encourages people to view and enjoy marine mammals from the shore, in a manner that does not harass the animals. In compliance with the Marine Mammal Protection Act, State Parks prohibits attempting to swim with, pet, touch, feed or elicit a reaction from marine animals. The new SCUBA/skin diver pamphlet will include the NOAA Fisheries' Marine Mammal Viewing "Code of Conduct" in it to help reduce the potential for wildlife viewing to inadvertently harm marine mammals.

#68 The DEIR was released on October 15, 2002 to the public with multiple press releases and public notices. The comment period closed December 2, 2002 after a 48-day review and was not extended. Neither the California Preservation Foundation or the California office of the National Trust for Historic Preservation requested copies of the DEIR or to be on the mailing list. These groups are advocacy professional groups and do not have authority over this project. The Office of Historic Preservation (OHP), the agency with jurisdiction over the project, was involved throughout the planning efforts and did not comment on the DEIR. The California Preservation Foundation requested a copy of the *PPUP* and DEIR on December 5, 2002 (after urging by members of the public) and was directed to the State Parks website where both documents were available. They did not comment on either the *PPUP* or the DEIR.

#69 Thank you for your support of State Parks research and planning efforts. It is part of the State Parks **Mission** to protect both cultural and natural resources. Although some clarifications have been made in the DEIR and are proposed for the *PPUP*, State Parks respectfully disagrees that potential impacts were not adequately addressed in the *PPUP* and DEIR.

#70 Neither the *PPUP* or the DEIR propose any actions that would result in a new impact or exposure of the cottages to wave uprush. In the existing condition, the cottages identified in Figure 3.1a, 3.1b and 3.3 are at risk due to flooding or wave uprush. Please see response # 21. Additionally, sea walls would be a visual distraction to the historic character. The Coastal Commission does not have the authority to order the removal of existing structures. If the cottages become at risk of loss due to extreme storm events or changes in the character of the wave action over time, the removal, recordation, or relocation of the cottages will be addressed according to the U.S. Secretary of Interior Standards for Historic Properties at that time. Slope buttressing is an option that may be pursued under the *PPUP* but must be done in such a way that any new retaining structures are hidden to eliminate potential visual impacts within the Historic District. In the event of natural disasters that might result in the need to remove or demolish historic structures, consultation would be made with the California Office of Historic Preservation per PRC 5028.

MEMORANDUM

date: December 2, 2002

from: BRUCE HOSTETTER *Bruce Hostetter*
 The Crystal Cove Community Trust
 205 N. Cornell Ave
 Fullerton, CA 92831
 714 879-5766 / fax 871-3606 / bruho@worldnet.att.net

to: Tina Robinson *619 220-5400*

subj: Public comment on Crystal Cove Hist. Dist. Preservation & Pub. Use Plan-EIR & General Plan Amendments

68 I recently learned that the California Preservation Foundation and the California office of the National Trust for Historic Preservation were unaware that the EIR and General Plan Amendment had been distributed and that they had not received a copy for their review and comment. It is my expectation that you will allow these two key historic preservation groups the additional time they might request to respond. I request that other respondents be given notice of that extension so that they can seek their advice on preservation issues and amend their own comments as required.

69 The Department of Parks and Recreation is faced with many complex and conflicting challenges as it plans for the preservation and future uses of the the Historic District at Crystal Cove. Over all, the EIR and General Plan Amendments appear to supported by extensive research and good planning. Given where the DPR was almost two years ago, with no plan and no money, these reports indicate that the Department is taking seriously the planning process for the Historic District. However, in order for the Historic District and adjacent marine habitats to treated with the highest possible standards for protection, I ask you to respond to my comments about the many potential impacts that have not been adequately addressed and the mitigation measures that have not been identified.

My comments are presented as follows in summary with some references to both reports.

70 1. The failure to discuss conflicting codes, policies and conditions for the use of coastal armoring of beach front historic structures. Mention of Public Use Code, Section 5024 which mandates protection of historic resources and with Coastal Commission regulations that allows protective structures have been ignored. There is no reference to the November 2001 Coastal Commission Special Condition that orders historic structures to be demolished if threatened by wave uprush. DPR needs to identify how historic structures in the affected zones will be protected in storms and justify their position to not oppose Coastal Commission Special Condition No. 2 in the Interim permit of November 2001.

The current temporary Coastal Permit makes the DPR exempt from the requirement to use coastal protection devices to protect historic resources and presumably will become a part of the final coastal permit. Therefore, part of this project exposes cultural resources to impacts with out indicating what the mitigation measures would be if the cottages were exposed to wave uprush from a 10, 50 & 100 year storm. It is unacceptable to expose

#71 The Historic Landscape Management Plan (HLMP) will update the nomination of the Historic District. Unless the HLMP recommends significant changes to the features elements and historic period of significance of the Historic District, it should not require additional CEQA review but it will require review by OHP. The HLMP will be available at the District park offices and Historic District when completed. All materials removed during the Interim project were photographed and mapped. The National Park Service procedures for cultural landscape management is an involved, detailed process that includes site photos, mapping, historic recordation and research as part of the HLMP. Vegetation was removed during the Interim plan implementation to prevent further deterioration of the cottages and improve fire safety. As discussed above, the locations and appearance of all items removed were documented by State Park cultural resource staff. State Parks welcomes additional submission of data for evaluation as part of the process. State Parks respectfully disagrees that there has been piece meal planning at the Historic District. The HLMP is in the process of being completed and there are no anticipated significant changes to the site and existing historic features. The HLMP will provide direction for both the daily maintenance and preservation treatments.

#72 State Parks does not propose to increase the size of the Los Trancos parking lot. Peak use of the beach is an existing condition. Due to activities at the Historic District and the increasing local population, there are likely to be more visitors during the summer peak season but their access will be spread out over a longer period of time due to the limited parking at Los Trancos. It is anticipated that access will be somewhat self-limiting because there is no parking immediately adjacent to the Historic District. The shuttle will be made available to all users but the run times have not been established. Also please see Section 4.2.5. Management actions may include increased Ranger patrol of sensitive marine resources, seasonally restricting public access to supervised visits or guided tours to tidepool and subtidal areas, and temporary and/or permanent closure of impacted areas.

#73 Please see response # 24 and Sections 4.2.1 and 7.1.2 of the DEIR.

ATTN: TINA - From B. HOSTETTER - CRY'S COVE COMMENTS

70 shoreline cottages identified as subject to these storms at risk to natural process and not provide protection or some form. More discussion is necessary to clarify DPR policy with regard to the special condition of the permit and ways in which the visual impact of these protective devices might be mitigated. The same concern applies to areas that may require slope buttressing that are subject to global land slides.

2. The failure to protect key historic landscape elements during the implementation of the Interim Plan and failure to time the draft EIR so that the treatment and impacts derived from a Cultural Landscape Report, that is currently being worked on, could be available for public comment. Since the "flow of history" changes through time in the cultural landscape is represented through a much more fluid and evolutionary pattern than the cottages, the 1979 nomination for Historic District should be amended with a nomination for Cultural Landscape and the period of significance, which may be different than that of the historic district, should be established based in part on the integrity of site features that have survived through the period that ended with the evictions.

71 Key, symbolic vegetation that was removed during the interim plan should be restored. That vegetation includes one variety of sweet peas known in the Cove as "Alice's Sweet Peas". Since lead abatement work on cottage #32, the Hideho, many contributing plant materials were lost including these seminal sweet peas. Other plants of historic significance dating as far back as the 30's have been left to survive on their own in a neglected condition. Please address how these symbolic plants are being treated as claimed, according to the Sec. Of Interior Stds. Seeing this neglect raises questions about the knowledge of those recording existing vegetation to know what is significant and why. If the timing of evictions had been different and the removal of significant historic vegetation in several locations (cottages 7, 32, & 21 that I have documented) had followed the procedures of the NPS, no plant material would have been removed until a Cultural Landscape Plan had identified treatment and analyzed impacts. The DPR has allowed the removal and neglect of vegetation that I have been able to identify through personal interviews with long time residents as having historic value. This is the result of piece meal planning. These impacts need to be identified and mitigation proposed.

3. In the discussion about "visitor capacity" the DPR has failed to assess how total number of visitors could be limited in order to protect coastal resources by the following mitigation measures.

- 72 a. Designating shuttle for over night guest only.
b. Limiting the number of parking spaces at Los Troncos to temper peak occupancies of the beach during peak times. The only way the DPR can restrict access to the fragile tide pools is either make them off limits to all, or limit the number of visitors by restricting parking and shuttle services. The mandate for public access is not a license to threaten cultural and historic resources. Further discussion of effective mitigation measures to protect sensitive marine habitats is in order.

73 4. It appears that the number of overnight accommodations in the plan is based on meeting a quota for number of beds required in a preexisting agreement between DPR and the Coastal Commission. Since partial funding for the preservation work is coming from this agreement it raises the question as to whether or not the DPR is precommitted to an outcome and basing number of cottages available for over night use on this precommitment in lieu of good preservation practice. Precommitments should not be substitutes for

2/2 (REPLACES PREVIOUS FA)

#74 Please see response # 26, # 32 and # 35. Funding for renovation of the Historic District has come through a variety of sources, despite the state budget crisis. While it is the intention of State Parks to have the Historic District be self-maintaining after the initial renovations are complete and provide low-cost accommodations to the public, final determination of the amounts to be charged will be decided at a later date.

#75 By following the professional standards established for preservation treatment for mothballing structures as developed by the National Park Service, State parks will continue to monitor the condition of the structures and features as approved in the Interim Plan.

#76 Please see Section 5.4 of the DEIR.

#77 Please see responses # 46, # 47, # 49-51.

planning criteria that is based upon sound preservation principals.

74 5. It is mentioned that revenues generated by over night use will be applied to maintenance of cottages and landscape if possible. How does the DPR guarantee that the number of cottages rented for over night use will be maintained in a sustainable manner if likely budget cuts from massive state deficits affect maintenance budgets in the immediate future. Rather than basing all rates for over night stays on affordability, some rates should be programatically tied to the cost of critical maintenance items to mitigate potential impacts to the historic structures in lean economic times. The DPR needs to demonstrate how it will protect the cottages from the intensive impacts of overnight use as a mitigation measure establishing limits on the number available for that use based on the ability to assure the highest maintenance standards that conform to the Secty. Of Interior Stds. for Hist. Preservation, not on precommitments for funding.

75 6. The plan establishes two phases for development. Presumably, the interim EIR would remain in effect until Phase One of the final plan is implemented. Impacts to the remaining cottages between the implementation of Phase One and the beginning of Phase Two is not discussed. How will further degradation be avoided for the cottages that are currently "mothballed" and designated for preservation work at a later undetermined time. What mitigation measures would apply for their protection while vacant and how can the DPR demonstrate that adequate funding will be available in the this interim period to assure that no further degradation will occur? If assurance is not possible at this time, impacts need to be estimated over a range of time frames in which cottages could remain vacant. Mitigation measures need to be stated for each time frame, since longer exposure will result in greater deterioration.

76 7. It is not clear if the analysis of demand and use for "visitor capacity" accounts for the cumulative impacts from the entire Crystal Cove State Park or if it is specific to impacts at the Historic District. Since El Morro is adjacent and linked by PCH and the beach to the Historic district, cumulative effects should be studied. Impacts and mitigation should be distinguished for both site specific and cumulative effects.

77 8. Locations for specific adaptive uses seem inconsistent with the guidelines for preserving Crystal Cove's "Spirit of Place". The maintenance and operation office designated for Cottage 5 makes sense in terms of its adjacency to the service and storage areas but makes no sense in terms of the criteria for a succession of visitor experience as they navigate in from the real world to the climax of the shoreline views. Cottage #5 needs to be the greeter in this succession with visitors sitting on the deck with their flowers on the table surrounded by a bed of lush colorful geraniums. Otherwise, the succession of experience will be disrupted by maintenance workers in pickups in an important terminal vista. Relocate Visitor Center to Cottage #5 and locate Operations in Cottage #0.

9. Cottage #15 is a landmark along the beach and the deck envisioned for the planned food service is too invasive and will denigrate this important landmark. Relocate food stand to the "Yacht Club" where there are fewer constraints and better access (no ramp or deck required) and Use Cottage #15 as the exhibit gallery. Add ramp on side but leave front yard substantially as it is.

10. Find a way to integrate restrooms for overnight guest into ends of existing cottages. Avoid converting cottages 20 and 25 into restrooms so as to preserve as much as possible the contributions of the interior spaces and maintain the greatest amount of reversibility possible. None of the cottages deserve to become "shit houses" (pardon my language).

#78 The SHPO (Knox Mellon), and his staff at OHP, have been extensively involved throughout the planning process for the *PPUP*. However, OHP is not the lead agency under CEQA for this project and, therefore, does not directly respond to the public comments. State Parks will continue to coordinate with OHP through the Memorandum Of Understanding (MOU) establishing the PRC 5024 process at State Parks. All PRC 5024 documents are turned over to OHP for review and record keeping.

#79 Thank you for your comment. Please see the General Plan Amendment for the correction.

- 78 [11. I understand that through a memo of understanding that SHPO has granted the DPR authority to perform a 5024 review as a part of this EIR. However, I would request that SHPO be a part of the response to comments that affect protection of cultural resources and to identify themselves in their response.
- 79 [12. Minor correcton, Page four of the table for ammendments in the General Plan Amendment uses the word evacuated instead of evicted for the tenants. You might want to check your terminology and make sure that is how you want to state it.

#80 Thank you for your comment. It is the intention of State Parks to preserve the Historic District and it's "Spirit of Place". The overnight accommodations and small store will be very different from nearby resorts.

October 16, 2002

Dear Tina Robinson,

80

In response to further development projected at the Crystal Cove State Park, I would like to state my views on any expansion that may take place there. I have lived in Costa Mesa since 1972, and grew up surfing and enjoying the beach and bluffs just south of Corona Del Mar. I used to walk through the horse stables to the beach to surf, and have walked and ran past the cottages on countless occasions. I believe that the State Of California should not expand this area beyond what currently exists as far as structures or any new buildings. The massive development just across PCH is a dreadful eyesore to this once pristine piece of coastline. I used to be able to surf, swim or dive and look back to the land and see just beautiful bluffs and an empty mountain backdrop. This has drastically changed over the past decade with all the development of the golf course and million dollar homes have made a terrible impact to the ocean life of this area. I hope the California State Park department will ensure that the remaining portion of Crystal Cove be kept as close to original as possible. Please do not be swayed by big money developers who might think resort like accommodations are the best interest for this area, because they are not, the people of this area have spoken out in the past as I am now. I'm also very thankful that we have this small slice of coastline in Crystal Cove please be good stewards of this coastal jewel.

Please contact me if you have any questions on my comments.

Sincerely,



Brad Warrick
3095 Murray Lane
Costa Mesa, Ca 92626
949-286-7549

#81 Thank you for your comment. Please see responses # 24, #26, # 35, and # 80. State VIPs or government state officials will not receive preferential treatment in the reservation system. The boardwalk is being recorded and evaluated as are all features within the National Register Historic District and its treatment will be in compliance with the U.S. Secretary of Interior Standards for Historic Places.

Paul Milward
14124 Avenida Espana Dr.
La Mirada, Ca. 90638
E mail: ccmilward@aol.com

Saturday, October 19, 2002

Ms. Tina Robinson
California State Parks
Southern Division,
8885 Rio San Diego Drive
Suite 270
San Diego, Ca. 92108

Dear Ms. Robinson:

I am a second-generation California and have been an avid beach goer for many years and I have taken my family down to California State Beaches in Orange County. I personally have been down to Crystal Cove many times and I can personally appreciate the plan that the State and Superintendent Mike Tope has put forth with a great deal of preparation.

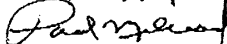
My wish is to leave the beach and or Crystal Cove surrounding alone with no further development. I personally like the fact that I can ride my bike along Pacific Coast Highway and go down to a view point and look at the beautiful beach and water with nothing on it and its beautiful, natural state. I also like the boundless unlimited area with the clean sand, crystal water and beautiful sky.

81 I cannot appreciate nor do I see the need for lodging since none of the California State Beaches have lodging at this time and lodging is literally up the hill and greater Orange County has a sufficient amount of lodging that is reasonable. My concern is that state VIP's or government state officials will be able to stay or lodge with privileged status. This will not apply to the everyday working Californian. Why is there a need to stay overnight and desecrate a precious California State treasure as Crystal Cove is?

The boardwalk is not necessary, one can enjoy the sand we don't need commercialization and any paved road or structure upsets the integrity of the beach itself. You can see the symmetrical cusps on the beach that the surf has created or patterns in the sand and you can see this from the cliff viewpoints. We do not need any retail shops because they are nearby. The public goes to Crystal Cove to get away from concrete laden parking lots and structures we do not need more structures.

I know that I am out of the mainstream as far as this plan is concerned and many hours were put into this project but I think this development will not serve the California taxpayer well in the future.

Very Truly yours,



Paul Milward

82 Please see response # 81. No single use is called out in the *PPUP* CARE program but rather the type of program proposed. The CARE program includes the opportunity for joint education. Please also see the DEIR Sections 4.2.5, 7.1.3 and 7.1.4.

Sylvia G. Maxson
339 Walnut St
Costa Mesa CA 92627-2333

10-31-02

Tina Robinson
Calif. State Parks, So. Div.
8885 Rio San Diego Dr., Suite 270
San Diego, CA 92108

Re: Crystal Cove Plan

I would like to see Crystal Cove remain
as rustic and natural as possible.

I do not believe a Beach Store +
Snack Bar will enhance the park.

82 Please do not commercialize the
park. Limited use + facilities will
be better suited to bring back it's
historical use. "Less is more" for this
park. Please do the right thing. Less
development, minimal upgrading + more



2000 Member
The Humane Society of the United States

Please see Response # 82 on previous page

preservation of the natural setting is all you need. People will come to see how it really feels to step back in time. Restrooms are all you need here. Limit overnight rentals; interpretation center should be small, arts + resources also limited use.

82 Do not encourage use of tide pools for education - it degraded Corona del Mar. Use joint education efforts with Upper Newport Bay + Shell maker Island + O.C. Interpretative Center.

The plan needs some downgrading of development. Restoration + preservation is the only thing needed here.

Sylvia H. Mason

83 Thank you for your support.



83

Just wanted to congratulate
all of you for the Crystal Cove
plans. Affordable beach places to
stay! Hurry!

Thank you, thank you -
Susie M. Little

410 St. Ann's Dr
Laguna Beach
92651

#84 The “Spirit of Place” and *PPUP* implementation envisioned by State Parks for the Crystal Cove Historic District is very compatible with your goal of retaining the basic character and quiet sense of retreat while providing the public with the opportunity to enjoy a short stay.

December 2, 2002

California State Parks, Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
Attention: Tina Robinson

Dear Ms. Robinson,

I trust that this evaluation will give the staff some insights into my thoughts about the Preliminary Crystal Cove Preservation and Public Use Plan, dated October 2002. I appreciate the time and effort the staff has given to develop a plan. I look forward to the time when the cottages will be restored and people will be able to enjoy this unique and wonderful place.

84

My goal for the Park is to see the basic character of Crystal Cove maintained and at the same time provide an opportunity for people to be able to enjoy a short stay within the Historic District. Attempting to maintain a quiet sense of retreat and at the same time inviting people to come into the Park presents some special and trying problems. With effort, a good plan can be developed.

My evaluation is divided into two sections. First a summary of the changes I would like to see made in the PPUP. The second section is an explanation for some of the changes I have suggested.

Thank you for giving me this opportunity to present my thoughts. I am hopeful that these ideas will have an influence on the final plan for the Crystal Cove Historic District.

Regards,



Dale Ghere
915 Meadowlark Lane
Laguna Beach, CA 92651-2842
949-494-1496

#85 Please see responses # 24, # 29, # 30, # 41-42, and # 49.

#86 Please see response # 40.

#87 Please see responses # 24, # 37, # 39, #40-41, # 48 and # 49. It is an important part of the CARE program to offer activities within the Historic District. Should the programs become too large for the cottages, then State Parks would look into constructing a permanent satellite facility at Los Trancos.

#88 Please see responses # 29-30.

#89 Please see response # 37. State Parks envisions a pedestrian friendly environmental within the Historic District core and beach-side areas.

#90 State Parks intends to keep rental rates low.

#91 Please see responses # 24, # 32 and 46. State Parks appreciates the intent to maximize overnight accommodations, however, there are 4 programs proposed for the Historic District as a result of the public meetings and operational needs. Each of these programs has cottages that may be appropriate for adaptive use given their location, risk assessment, and structural suitability given the need to retain historic integrity. State Parks intends to remain flexible in the choice of locations for each program but must adhere to the site constraints. House museums were chosen based on their constraints. Additionally, the *PPUP* and DEIR are not the appropriate vehicle for determining whether or not kitchens are appropriate within the dorms. Cooking facilities are incorporated into the *PPUP* as an option should the management of the overnight accommodation prove that it's needed. However, the use of kitchen facilities within the dorms or other overnight accommodations could cause maintenance and upkeep issues that could require their elimination.

Summary of Suggested Changes to the Preliminary

Preservation and Public Use Plan

- 85 [1. Drop the suggested uses for cottages 5, 14, 21, 22, 27, 30, 32 (or 26), 42 and 43. Convert their use to overnight rentals.
- 86 [2. Move the Offices of the Resource Ecologist and the State Park Superintendent out of the Los Trancos Facility.
- 87 [3. Keep the use of cottages 34 and 43 for multi-use, but change cottages 42 and 44 from multi-use to overnight rentals. The functions originally planned for 42 and 44 could then be shifted to the Los Trancos facility and/or to the office/docent facility.
- 87 [4. Move the research cottage from 13 to 45 (or to 18, or to the Los Trancos Facility).
- 87 [5. Increase the number of cottages for overnight rentals. I think that a minimum of 33 cottages should be used for overnight rentals and 4 cottages should be used as dorms. The number of rental spaces could be increased significantly if some of the 33 cottages were divided into two or more overnight rental units.
- 88 [6. Change the priorities of building use from meeting staff needs to meeting public overnight use.
- 89 [7. Limit vehicle traffic to the core road and perimeter parking areas.
- 89 [8. Limit vehicle use of the south road to cottage maintenance and ADA access to cottages.
- 90 [9. Keep the rental rates low.
- 91 [10. Provide kitchen facilities for dorms.
- 91 [11. Do not use either cottage 25 or 26 as a museum. Keep them available for overnight rentals.
- 91 [12. Move the café from cottage 15 to cottage 5.

#92 Please see responses # 29 and # 30.

#93 Please see response # 91.

#94 Please see response # 91.

Reasons for Changing the Preservation and Public Use Plan

1. Park Staff Housing

Providing housing for law enforcement (peace officer), ranger supervisor, lifeguard supervisor, peace officer/lifeguard and maintenance employee(s) is not needed. These people can live off-site and work normal hours. It is better to pay someone to work 10:00 P.M. to 6:00 A.M. and use the cottages as overnight rentals. Normal staff will provide services from 6 AM to 10 PM. One mobile unit could cover the entire park between 10:00 P.M. and 6:00 A.M. better than 5 sleeping people.

92 If the five parks staff residences requested for park operations are permitted they and their family members will have a significant influence on the number of vehicle trips in the Historic District (HD) each day.

It is not reasonable to lose the use of five cottages to staff housing. The only resident housing that should be allowed in the HD is the manager for the overnight rentals.

If five cottages are designated for park staff housing, then approximately 5,000 people per year will be denied an opportunity to use a cottage rental (3 people/cottage x 5 cottages x 364 days = 5,640 potential visitors per year). If the 5 cottages were rented at \$50 per night it could generate over \$90,000 per year. For this amount of money someone could be hired to work from 10:00 P.M. to 6:00 A.M.

2. Kitchen Facility for Dorm Guests

93 A kitchen facility and dining area should be available to guests using dorms. This is an important consideration because many people who use this type of accommodation want to be able to prepare simple meals.

3. Museums

It is suggested that cottages 35 or 28 might be used as museums to show people what a cottage would have looked like in the early years of Crystal Cove. This should not be done in either of the cottages. In order for the guest to the Historic District to get an idea of what the original cottages looked like, other areas could be used. Such as, the office manager's registration area, the visitor center or the museum that will be on the beach (the old store).

94 The old store is a good location for a museum. It is located where many people will pass by and it is separated from the overnight rentals. If cottages 25 or 28 were used as a museum then they would attract more people to walk around and through the northern cottage area. That area is supposed to be a "quiet retreat." A whole cottage, which could be used as an overnight rental, should not be converted into a museum.

4. Food

If the café in cottage 15 is going to be used to serve three meals a day to visitors, I think some serious evaluation needs to be done now on how this will be accomplished. If the cottage is not large enough to provide a kitchen then food will have to be brought in often. This has a potential of increasing vehicular entries through the HD daily. If catered food is provided, more

#95 The priorities were developed based on the need to open the Historic District to the greatest number of people first. This includes the construction of the major infrastructure and circulation elements and well as providing restrooms, meeting facilities, and operational support for the public. The areas easiest to repair and central to the Historic District were included in the first phase.

#96 Please see responses # 29 and # 30.

packaging and waste materials will be produced. This will increase the need for trash storage and pick up.

94 I know that any food concessionaire would want to be located as near the sand as possible in order to get the summer beach business. Perhaps cottage 5 would be a better location for the café for the proper functioning of the HD. Cottage 5 is near a parking lot, it is in the upper part of the Hollow and it has more space available for people to eat. Catering and trash trucks would have easier access to cottage 5 than cottage 15. Traffic movement through the lower portions of the Hollow would be reduced.

5. Priorities

95 The priorities of the plan need to be changed. The major priority of the plan appears to satisfy the needs of the Park staff first. The next priority is fulfilling the plans for a CARE program and a hostel program. The last priority is to use whatever cottages are left as overnight rental units. The plan calls for approximately 25 cottages to be used as rentals, but this number could be significantly reduced because of deterioration of the present buildings, cost of restoration or geologic conditions influencing the structure. The staff selected those cottages that are in the best condition for their own use first (residences, maintenance, security, museum, café, store, education, storage, management and research), and all other cottages are lumped into the overnight rental category. Several of those in the overnight rental category are unlikely to be restored unless heroic efforts are forthcoming.

Staff Needs

96 Some of the functions that Parks staff wants to put in the Crystal Cove area should be located someplace else:

1. The Los Trancos facility does not need to provide office space for an ecologist or park superintendent.
2. The Office for Crystal Cove State Park maintenance and operations is located outside of the HD now. It should remain at the El Morro facility.
3. If the Freed resort plan had been implemented there would not have been a lifeguard headquarters located in the HD, yet the beaches would have had lifeguard service. No single cottage should be designated for this purpose. The new lifeguard building at El Morro should fulfill all of the needs that a building site can provide for the lifeguards.
4. Housing within the HD for Park staff members is not essential. For security reasons some staff members may need to be housed within the HD while reconstruction is going on, but the housing of staff should not continue indefinitely. A plan should be made now to phase staff housing out of the HD. In no case should staff housing be extended beyond the year 2007.

#97 Please see responses # 85-89.

#98 Please see response # 95.

#99 Thank you for your support.

Care Program

- 97 [The development of a complete CARE program within the cottages should not occur until 30 overnight rentals and 4 dormitories have been developed. Until the overnight rentals have been developed the CARE programs should be limited to:
1. Los Trancos facility
 2. Visitor Center
 3. The old store on the beach
 4. Outdoor meeting areas within the HD

Overnight Rentals

- 98 [The reconstruction of the cottages for rental purposes needs to have the top priority. Cottages that cannot be rebuilt need to be identified now. Cottages which have the potential to be subdivided into two or more units should be named. The report neglects both of these types of cottages. Between the conflicting information between Chart H, Map 5 and Map 6 in the PPUP, it is hard to know just how many cottages will be available for overnight rental use once the restoration of the HD is completed.
- There is always a competition for resources in any situation where several entities want more space and control.
- In the workshop meetings it was clear that a majority of the people wanted to see the future plan for CCHD utilize as many cottages as possible for overnight rental use, either as individual units or as hostels. I believe that any re-writing of the preliminary PPUP should increase the number of cottages for overnight rentals, decrease the number of cottages to be utilized by Park staff and re-assign the places where CARE activities will occur. Use the bluff area for dormitories and group activities, keep most of the vehicular and pedestrian traffic on the core road through the Hollow and attempt to maintain the north and south beach cottage areas as quiet retreats. Do this in order to develop a "sense of place" for those who are fortunate enough to be able to spend some time in one of the cottages.

Thank You

- 99 [I want to thank everyone who has worked so diligently to plan the future of Crystal Cove Historic District. Some day people will visit the Historic District, enjoy their stay and then go home with many fond memories. They will be unaware of all the work that went into preserving this special place. I am aware of your work on this project and I appreciate it very much. I commend you for your efforts.

Regards,

Dale Ghere

This letter was received after the close of comments on December 2, 2002. However, in the interest of full public disclosure, this letter is printed in its entirety and responses have been prepared.

#100 Please see Section 6.2 of the FEIR. The Coastal Environments study has been added.

101 The Natural Community Conservation Plan & Habitat Conservation Plan, County of Orange Central & Coastal Subregion Parts 1 & 2: NCCP/HCP, Section 5.8.7 explains:

“As stated in Section 5.8.2 of the NCCP/HCP, the Crystal Cove General Plan of 1982, approved by the California Coastal Commission, has been review and determined to be compatible with the policies of this NCCP/HCP. New facilities or improvement, repair, maintenance, and operation of existing facilities in accordance with the adopted General Plan are allowed. Crystal Cove State Park has two ongoing coastal sage scrub restoration programs covering 18 acres of the parkland that are not mitigation for any past disturbances. In recognition of this, mitigation credit in the amount of 18 acres is assigned to Crystal Cove SP to offset future impacts... Should the required mitigation for such impacts exceed the allowed credit, additional restoration may be required (R. J. Mead Consulting Inc. 1996).”

Additionally, the U.S. Fish and Wildlife Service requested that the NCCP mitigation credit be used for this project.

#102 The new parking lot has been designed to prevent impacts that would significantly degrade the adjacent environmentally sensitive habitat areas. The location is currently eroded and, depending on the spring 2003 biological survey results, may be reduced in size. Please refer to Sections 2.3.8 and 2.3.9 of the DEIR for a discussion of alternatives. Due to site constraints, there is no opportunity for relocation of the parking lot.

103 The slope stabilization would be proposed to protect existing structures. Additional detail for the North Beach area would be proposed as part of the design detail to the Coastal Commission when that phase of the project is proposed.

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 OceanGate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



December 3, 2002

Tina Robinson, Environmental Coordinator
California State Parks
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

SUBJECT: DEIR for Crystal Cove Historic District Preservation and Public Use Plan (PPUP), Crystal Cove State Park, Orange County

Dear Ms. Robinson:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Crystal Cove Historic District Preservation and Public Use Plan (PPUP). The comments provided below convey project concerns and questions which Coastal Commission staff believes should be addressed in the final environmental document.

100 Wave Uprush Analysis

Page 38 of the DEIR states, "a coastal study was performed to determine credible wave height, wave up-rush, scour and sand balance distribution within the History District limits." However, the text of the DEIR does not describe who performed the study or when it was conducted. Additionally, the corresponding figures (3.1a, 3.1.b, 3.2) do not cite the applicable source. Please cite the source in the FEIR. Also note—the figures are difficult to read due to the similarity of the patterns used.

101 Vegetation Impacts

The DEIR discusses potential impacts to Coastal Sage Scrub (CSS) through various activities proposed in the PPUP. The "Mitigation Veg-1" discussion states, "Crystal Cove State Park currently has mitigation credit in the amount of 18 acres." How was this acquired? The FEIR should include a detailed discussion of the mitigation credit history and the adequacy of the replacement ratio to be applied. Please note that the Commission prefers on-site mitigation wherever possible.

102 Parking Lot West of PCH

Section 30240 of the Coastal Act requires environmentally sensitive habitat areas to be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. In addition, 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.

The DEIR evaluates a new parking lot located within a potentially sensitive habitat area, as shown in Figure 2.2 Sheet S-4. The parking lot would serve emergency response vehicles, staff and program participants. The lot is proposed in an area that is currently undeveloped and contains native habitat. The FEIR should include a more detailed analysis of the need for the lot and alternatives to the proposed location and proposed design. Alternatives may include a smaller lot or relocation of the lot.

103 Slope Stabilization

The DEIR discusses the "potential for global slide at North Beach" and recommends a "combination of material removal and replacement and soil nail wall construction" to protect the cottages in that vicinity. Additional detail regarding the proposed slope stabilization (i.e. necessity,