

CALIFORNIA COASTAL COMMISSION

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STAFF REPORT: CONSENT CALENDAR

Application No.: 6-13-0591

Applicant: California Department of Transportation (Caltrans)

Agent: Kim Smith

Location: The project site is located immediately east of Interstate 5 (I-5) and south of the Via de la Valle Interchange along the southern slopes of the San Dieguito River Valley, City of San Diego, San Diego County.

Project Description: Substantial restoration and preservation of upland coastal habitats including coastal sage scrub and southern maritime chaparral at the 23.1 acre Dean Mitigation Site. Minimal grading, temporary irrigation installation and signage are also components of the proposed plan.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION:

The applicant is proposing to substantially restore disturbed upland habitat and preserve existing high quality upland habitat at the Dean Mitigation Site to provide a mitigation bank for impacts that are anticipated to occur from future Caltrans projects along the I-5 and rail projects along the Los Angeles to San Diego rail corridor (LOSSAN) all located within the North Coast Corridor (NCC) of San Diego County. These future transportation projects have yet to be approved by the Commission, and will require future Commission review. The proposed project also includes temporary irrigation, fencing, and a minor amount of grading.

The major issues with this development involve adherence to the approved final mitigation plans, construction methods and timing, and the accounting mechanics for the mitigation acreages. As a whole, the proposed project would restore degraded and retired agricultural fields back to a natural condition that would result in enhanced coastal upland habitats that would contribute to the larger adjacent restoration projects currently being implemented within the San Dieguito River Valley and Lagoon system. Potential impacts to water quality and biological resources are remedied through the attached special conditions. Commission staff is recommending that the Commission **APPROVE** a coastal development permit for the proposed development with **five (5) special conditions** addressing these potential adverse impacts. Impacts to biological resources are addressed through **Special Conditions #1, and #2** which require adherence to the submitted final Habitat Mitigation and Monitoring Plan (HMMP) and ensure that future mitigation acreages will be appropriately accounted and reported to the Commission. Timing of construction is restricted by **Special Condition #3** which restricts construction activities to occur outside of the bird nesting season. **Special Condition #4** would protect water quality by requiring the applicant to adhere to the prescribed BMPs and construction methodologies, and **Special Condition #5** requires submittal of all other state or federal discretionary permits for the development authorized by this permit.

Standard of Review: Portions of the proposed project are located within the City of San Diego's Local Coastal Program, and areas of deferred certification within the Coastal Zone that are still under the jurisdiction of the Commission. The City of San Diego and the Commission have agreed to process the proposed project as a consolidated permit and therefore the Chapter 3 policies of the Coastal Act are the standard of review for the proposed project.

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EXHIBITS

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I. MOTION AND RESOLUTION

The staff recommends the Commission adopt the following resolution:

Motion:

*I move that the Commission **approve** the coastal development permit applications included on the consent calendar in accordance with the staff recommendations.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

II. STANDARD CONDITIONS

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

The permit is subject to the following conditions:

1. **Final Restoration Plans. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a final HMMP for the restoration site that is in substantial conformance with the Dean Mitigation Site HMMP (dated July 2013) submitted by Caltrans in support of the permit application, and shall be subject to the review and written approval of the Executive Director. The final HMMP shall include, but not be limited to, the following:
 - Identification of an appropriate, natural, upland habitat reference site for coastal sage scrub that contains the necessary elements to support the California coastal gnatcatcher and that is located within the Coastal Zone of North San Diego County as close to the restoration site as is feasible.
 - For reference sites for each vegetation community to be restored, a description of the site based on a preliminary quantitative sampling program.
 - A site preparation and planting plan for each vegetation community to be restored or enhanced. The site preparation may include removal of some native vegetation, such as coyote brush, that tends to recruit to and dominate disturbed areas. The planting plans shall include plant palettes for both seeds and container plants with the quantities, densities, and spacing, as appropriate, for each species and maps showing the spatial layout of planting. The planting plans should be based on the desired community characteristics as exemplified by the reference sites.
 - Irrigations methods that mimic natural rainfall patterns, except where dry season irrigation is necessary to prevent plant death or damage.
 - Provision for removing all temporary irrigation, with the exception of the main line extension buried beneath the access road to the site after success criteria have been achieved.
 - Performance standards for each vegetation type, including standards for average cover of woody and herbaceous vegetation, standards for species richness, standards to insure appropriate co-dominance of important structure-producing shrubs, and standards for non-native vegetation.
 - A description of the methods by which success will be judged.
 - Where statistical comparisons will be made, provisions for sampling with sufficient replication to insure 90% statistical power with $\alpha=0.10$ to detect a 10% difference. A statistical power analysis will be necessary to estimate the necessary replication.

- A provision that final monitoring for success shall take place no sooner than three years following the end of all remediation and monitoring activities, other than weeding.

The permittee shall undertake the development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit amendment unless the Executive Director determines that no additional amendment is legally required.

2. **Mitigation Acreage Accounting.** In order to provide updated and accurate mitigation acreage amounts utilized as a part of the Dean Mitigation Site, the permittee shall provide written notification to the Executive Director describing final mitigation acreage amounts to be utilized on-site associated with the impacts from each individual transportation project. This information shall be provided when final permits with required mitigation amounts are issued by the relevant state and federal agencies.
3. **Timing of Construction.** To avoid potential impacts to coastal California gnatcatcher nesting season, site preparation, irrigation installation, initial exotic removal, and planting in the restoration area will not be permitted between the dates of February 15th and August 15th of any year; unless written permission from the California Department of Fish and Wildlife and/or the US Fish and Wildlife Service is provided to the Executive Director for review and approval.

The permittee shall undertake development in accordance with the approved final construction timing plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. **Construction Best Management Practices.** The permittee shall comply with the following construction-related requirements:
 - No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion;
 - No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers;
 - Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24 hours of completion of the project;

- Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters;
- All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day;
- The applicant shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction;
- Debris shall be disposed of at a legal disposal site or recycled at a recycling facility. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required;
- All stock piles and construction materials shall be covered, enclosed on all sides, shall be located as far away as possible from drain inlets and any waterway, and shall not be stored in contact with the soil;
- Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems;
- The discharge of any hazardous materials into any receiving waters shall be prohibited;
- Fuels, lubricants, and solvents shall not be allowed to enter the coastal waters or wetlands. Hazardous materials management equipment shall be available immediately on-hand at the project site, and a registered first-response, professional hazardous materials clean-up/remediation service shall be locally available on call. Any accidental spill shall be rapidly contained and cleaned up. Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible;
- Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity; and
- All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

5. **Other Permits. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION**, the permittee shall provide to the Executive Director copies of all other required state or federal discretionary permits for the development authorized by Coastal Development Permit 6-13-0591. The applicant shall inform the Executive Director of any changes to the project required by other state or federal agencies. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this permit, unless the Executive Director determines that no amendment is legally required.

IV. FINDINGS AND DECLARATIONS

A. DETAILED PROJECT DESCRIPTION

The subject site (latitude 35.9572 and longitude -117.2399) is located within the San Dieguito River Valley, directly east of I-5 and south of the Via de la Valle Interchange along the southern slopes of the valley and adjacent to the Crest Open Space ([Exhibit 1](#) and [Exhibit 2](#)). The Dean Mitigation Site is approximately 23.1 acres in area and was the location of former tomato agricultural operations that have ceased since 2005. The existing conditions on-site consist primarily of areas of disturbed non-native vegetation interspersed with patches of disturbed baccharis scrub and bare ground. A 1.45 acre area of coastal sage scrub/southern maritime chaparral is located along the southern boundary of the property ([Exhibit 3](#)). The subject site is located within the City of San Diego's Multiple Habitat Planning Area (MHPA).

The applicant proposes to restore native habitats on-site as a part of the Dean HMMP in order to mitigate for impacts that are expected to result from several transportation projects that Caltrans and SANDAG are proposing within the San Diego NCC, and area within the Coastal Zone extending from La Jolla in the south, 27 miles north to the City of Oceanside. These future planned infrastructure projects include projects along the I-5 and LOSSAN rail corridors that are currently identified within a draft public works plan (PWP) for the NCC that is currently under development by Caltrans and SANDAG. The Dean Mitigation Site is identified within the draft PWP as a potential site for future mitigation. The PWP and the associated suite of transportation projects has yet to be reviewed or approved by the Commission and thus, while the project is being proposed to provide mitigation for the expected impacts of those projects, at this time, the project is not required mitigation but instead would function as a mitigation bank for these anticipated future impacts. Commission approval of the proposed mitigation site in no way would preauthorize impacts associated with these future transportation projects or removes the requirement that the applicant avoid impacts to coastal resources to the greatest extent feasible.

The goal of the Dean HMMP is to restore and preserve coastal sage scrub and southern maritime chaparral that would provide enhanced, high quality habitat for many species including sensitive species such as the California gnatcatcher and orange-throated whiptail lizard. Several sensitive plant species already existing within the southern

portions of the site including wart-stemmed ceanothus, sea dahlia, scrub oak and Del Mar sand Aster would also be afforded protection through the retirement of development potential of the site. The proposed mitigation plan would substantially restore 20.5 acres of coastal sage scrub on-site as well as preserve the existing 1.45 acres of southern maritime chaparral that presently exists on-site. A small sliver of area located along the western edge of the site currently consisting of bare ground and disturbed vegetation would be impacted by construction of the I-5 NCC Project, and an existing dirt road would be left in place to allow for maintenance access to the restoration site. The proposed mitigation plan includes a detailed planting plan describing the species, densities and distribution of the various plants associated with the different habitat types ([Exhibit 4](#)). All habitat communities within the subject site would be preserved as open space in perpetuity.

There are erosion gullies within the site that were the result of flow funneled down the dirt maintenance roads for the former agricultural fields. These gullies have continued to erode over time. The proposed project includes the installation of small check dams to minimize future erosion and small berms will be placed at the northern portions of the property where the gullies exit the site in order to trap any residual sediment that would otherwise be transported offsite to the lagoon system located downslope.

Temporary irrigation will be installed within the graded area on-site to assist in plant establishment. After plantings have been completed and become established, all above ground portions of the irrigation systems would be removed.

The Dean HMMP includes a five-year monitoring and maintenance program, with scheduled annual reporting requirements to all relevant resource agencies. The proposed mitigation plan includes detailed monitoring protocols and performance standards that must be achieved before final sign-offs for plan success can be issued. After performance standards have been achieved and final sign-off provided, the property would likely be given to the San Dieguito River Park Joint Powers Authority (JPA) to manage and preserve the site as wildlife habitat in perpetuity as a part of the MHPA and an endowment for land management would be finalized. The MHPA represents the City's planned habitat preserve established under the City's Multiple Species Conservation Program (MSCP). Within the MHPA, development will be limited to ensure the long-term viability and recovery of 85 "covered" species. Through this strategy, the MSCP will preserve a network of habitat and open space, protecting biodiversity and enhancing the region's quality of life.

In order to minimize impacts to the restoration site caused by human interference the applicant proposes to install a four strand barbed wire fence along the site perimeter. There are no existing trails that traverse the site that would be closed in association with the proposed mitigation plan.

Although the City of San Diego has a fully certified LCP, a few areas of deferred certification remain within the San Dieguito River Valley area, including the majority of the subject site. The area is included in the delineated MHPA, but no documentation was forwarded to the Coastal Commission for review and certification. Thus, the preserve

remains within the Commission's permit jurisdiction, and the Chapter 3 policies of the Coastal Act are the legal standard of review. Policies of certified land use plans for surrounding communities are used as guidance where appropriate. A small portion of the subject site is also located within the jurisdiction of the City of San Diego Local Coastal Program. Section 30601.3 authorizes the Commission to process a consolidated coastal development permit application when requested by the local government and the applicant and approved by the Executive Director for projects that would otherwise require coastal development permits from both the Commission and from a local government with a certified LCP. The policies of Chapter 3 of the Coastal Act provide the legal standard of review for a consolidated coastal development permit application submitted pursuant to Section 30601.3, with the local government's certified LCP used as guidance.

B. BIOLOGICAL RESOURCES

The goals of the Dean HMMP include the restoration and preservation of sensitive coastal upland plant communities in order to provide high quality habitat for rare, threatened and endangered animal species. Given the highly disturbed nature of the subject site, no impacts to native habitat areas are expected. The proposed mitigation plan would result in the restoration of 20.5 acres of coastal sage scrub habitat as well as the preservation of 1.45 acres of southern maritime chaparral. With the addition of the proposed mitigation plan a large area of contiguous land would now be connected between the Crest Open Space preserve to the south and San Dieguito Lagoon to the north that would serve to strengthen the wetlands/uplands connection enhancing habitat values for sensitive coastal species.

The proposed mitigation plan includes a detailed planting plan for the included habitat areas that describes the selected species compositions, distributions and densities. The proposed mitigation plan also includes maintenance and monitoring requirements for the site as well as specific performance standards that will need to be achieved prior to final sign-off of plan success. The proposed plans have been reviewed by the Coastal staff ecologist and have been found generally acceptable, with the additional requirements in **Special Condition #1**. These changes to the HMMP include separate plans and standards for each vegetation type, the identification of an appropriate reference site to be located within the Coastal Zone of San Diego County for evaluation of the success criteria for coastal sage scrub, and more detailed success criteria, including performance standards for species diversity to further inform the success of the restoration site. Lastly, the final HMMP shall identify that all temporary irrigation included in the plans shall be removed upon project completion except for the small mainline portions placed underneath the dirt maintenance road. **Special Condition #1** requires adherence to the submitted HMMP as altered by additional requirements identified by the Commission.

The purpose of the Dean Mitigation Site is to serve as mitigation for future impacts that are anticipated to result from planned transportation infrastructure improvement projects located along the I-5 and LOSSAN rail corridors within the North San Diego County Coastal Zone. These transportation projects are included in a draft PWP for the NCC that is currently under development by Caltrans and SANDAG, and have not come before the

Commission for review at this time; therefore, the proposed mitigation plan is solely presented as a restoration plan that could provide necessary mitigation for impacts associated with these planned future transportation infrastructure projects. No approvals for anticipated impacts associated with these future projects are considered as a part of the proposed mitigation plan, and these anticipated impacts will require future Commission review for those projects located within the Coastal Zone. In order to ensure that sufficient mitigation acreages are available to mitigate for the anticipated impacts associated with the projects included within the draft PWP, **Special Condition #2** requires that a final mitigation acreage allocation be submitted for review by the Executive Director each time that final permits have been issued in association with each individual project that would utilize mitigation acreages provided under the plan.

In order to ensure that installation of the proposed project would not negatively impact the adjacent watershed and associated habitat **Special Condition #4** requires adherence to Best Management Practices for construction activities. Additionally, **Special Condition #3** restricts the timing of vegetation removal and grading activities so that they would only occur outside of the nesting season for coastal California gnatcatcher. Any other required discretionary permits (Regional Water Quality Control Board, U.S. Army Corps of Engineers) are to be submitted to the Commission for review as described in **Special Condition #5**.

The Commission finds that only as conditioned and described above, can the proposed development be found consistent with Section 30240 of the Coastal Act which requires biological resources be protected, and where possible, enhanced. As conditioned, the project will not have an adverse impact on any sensitive habitats. Thus, the project is consistent with the resource protection policies of Chapter 3 of the Coastal Act.

C. WATER QUALITY

During the construction phase, due to grading, the main potential pollutant of concern would be sediment. Other potential pollutant sources could include fuel and lubricants from construction equipment. Standard erosion control practices are proposed to minimize sedimentation during and following construction activities. Temporary BMPs anticipated for this project include fiber rolls and controlled construction entrances. The proposed project also includes the installation of small check dams to minimize future erosion, and small berms will be placed at the northern portions of the property where gullies exit within the site in order to trap any residual sediment that would otherwise be transported offsite to the lagoon system located downslope.

Special Condition #4 requires the applicant to include erosion control/water quality management measures specific to any proposed staging areas and also requires the applicant to include trash and debris disposal and an accidental spills clean-up plan.

The Commission finds that only as conditioned as described above, can the proposed development be found consistent with Section 30231 of the Coastal Act which requires hydrological resources and floodplains be protected, and where possible, enhanced. As conditioned, the project will not result in erosion or adverse impacts to water quality.

Thus, the project is consistent with the resource protection policies of Chapter 3 of the Coastal Act.

D. PUBLIC ACCESS

The subject site is located within the designated MHPA. There are a few unimproved former maintenance roads running through the surrounding open space, some within, or in close proximity to, the subject site. These are used by JPA rangers and will be utilized by the applicant during project construction and monitoring. No significant trails bisect or provide access through the subject site at this time.

Access to the subject site from the surrounding areas would be restricted under the proposed plan. In order to better ensure successful habitat establishment, the applicant has proposed installation of a four strand barbed wire fence along the perimeter of the subject site. The proposed fence would not restrict movement of resident animal species but would deter impacts from human and vehicle traffic upon the subject site. There is currently no public access on the site, and the project will not create adverse impacts to public access. To the contrary, the finished project will increase coastal resources in the area and thus provide a more enjoyable recreational experience for the public using the surrounding open space areas.

The Commission finds that only as conditioned and described above, can the proposed development be found consistent with Sections 30210 through 30214, Sections 30220 through 30224, Section 30252 and Section 30604(c) of the Coastal Act. The proposed development will not have an adverse impact on public access to the coast or to nearby recreational facilities.

E. ARCHAEOLOGICAL RESOURCES

The applicant has identified that the subject site has the potential to contain cultural resources. To avoid any impacts to this resource, a limited use area has been identified within the project plans where no trenching would occur and all work would be done by hand. Additionally, a Native American monitor would be present at the site during any ground disturbing construction activities. If cultural materials are discovered during construction, all earth-moving activities within and adjacent to the discovery area would be diverted until a qualified archaeologist can assess the nature and significance of the find. Therefore, the Commission finds that the development, as conditioned, conforms to Section 30244 of the Coastal Act.

F. COMMUNITY CHARACTER/VISUAL QUALITY

The proposed restoration project would not alter or distract from the existing views of coastal resources or change the character of the surrounding scenic corridor. Therefore, the Commission finds that the development, as conditioned, conforms to Section 30251 of the Coastal Act.

G. LOCAL COASTAL PROGRAM

Portions of the subject site are located within the jurisdiction of the City of San Diego's Local Coastal Program, while other areas of the proposed project are located in areas of deferred certification where the Commission still has jurisdiction. The City has requested that the Coastal Commission review the project proposal as a whole, and process the entire development as a consolidated coastal development permit. Under Coastal Act Section 30601.3, Chapter 3 of the Coastal Act is the legal standard of review for the entire project, and the certified LCP has been used as guidance. The proposed project has been found consistent with all applicable Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the project will not prejudice the ability of the City of San Diego to continue implementation of their individual LCPs.

H. CONSISTENCY WITH CEQA

As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

APPENDIX A

SUBSTANTIVE FILE DOCUMENTS

1. *Habitat Mitigation and Monitoring Plan for the Dean Mitigation Site*. California Department of Transportation, District 11, dated July 2013.
2. City of San Diego Local Coastal Program.
3. *Historic Property Survey Report*. California Department of Transportation, District 11, dated July 1, 2013.
4. *Categorical Exemption/Categorical Exclusion Form*. California Department of Transportation, District 11, dated June 20, 2013.



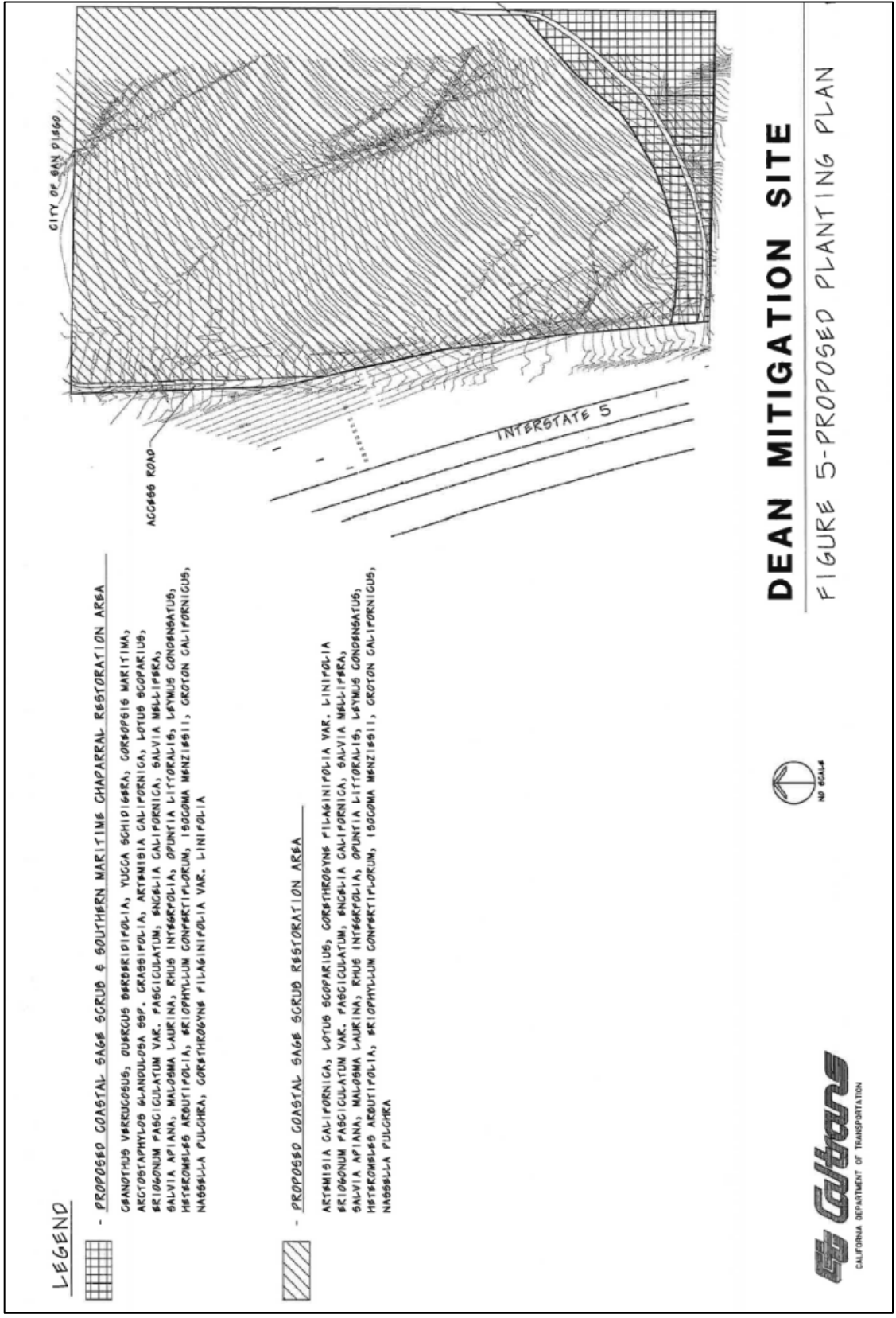
EXHIBIT NO. 1
APPLICATION NO.
6-13-0591
Location Map
California Coastal Commission



EXHIBIT NO. 2
APPLICATION NO. 6-13-0591
Vicinity Map
 California Coastal Commission



EXHIBIT NO. 3
APPLICATION NO. 6-13-0591
Existing Conditions
California Coastal Commission



LEGEND



- PROPOSED COASTAL SAGE SCRUB & SOUTHERN MARITIME CHAPARRAL RESTORATION AREA
 GRANTHUS VERUCOSUS, GUSSEUS DORRERIPOLIA, YUGCA SCHIDIGERA, GOROPHIS MARITIMA,
 ERIOSTAPHYLON BLANDULOSA ssp., CRASSIFOLIA, ARTEMISIA CALIFORNICA, LOTUS SCOPARIUS,
 ERIOGONUM FASCICULATUM VAR. FASCICULATUM, ENGELIA CALIFORNICA, SALVIA MELLIIFERA,
 SALVIA AFIANA, MALVOSA LAURINA, RHUS INTEGRIFOLIA, OPUNTIA LITTORALIS, LEYMUS CONDENSATUS,
 HETEROMELIS ACUTIFOLIA, ERIOPHYLLUM CONFERTIFLORUM, BOCCONA MENZIESII, GROTON CALIFORNICUS,
 NASSELLA PULCHRA, CORSTROGYNUS FILAGINIFOLIA VAR. LINIFOLIA



- PROPOSED COASTAL SAGE SCRUB RESTORATION AREA
 ARTEMISIA CALIFORNICA, LOTUS SCOPARIUS, CORSTROGYNUS FILAGINIFOLIA VAR. LINIFOLIA
 ERIOGONUM FASCICULATUM VAR. FASCICULATUM, ENGELIA CALIFORNICA, SALVIA MELLIIFERA,
 SALVIA AFIANA, MALVOSA LAURINA, RHUS INTEGRIFOLIA, OPUNTIA LITTORALIS, LEYMUS CONDENSATUS,
 HETEROMELIS ACUTIFOLIA, ERIOPHYLLUM CONFERTIFLORUM, BOCCONA MENZIESII, GROTON CALIFORNICUS,
 NASSELLA PULCHRA



DEAN MITIGATION SITE

FIGURE 5-PROPOSED PLANTING PLAN

EXHIBIT NO. 4
APPLICATION NO. 6-13-0591
Planting Plan
California Coastal Commission