

**CALIFORNIA COASTAL COMMISSION**

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



Filed: 4/16/98  
49th Day: 6/14/98  
180th Day: 10/13/98  
Staff: PE-LB 24  
Staff Report: 4/23/98  
Hearing Date: 8/11/98

**STAFF REPORT: PERMIT AMENDMENT**

**APPLICATION NO.:** 5-91-463-A-3 (Playa Capital Company LLC)

**APPLICANT:** Playa Capital Company LLC

**AGENT:** Robert Miller

**PROJECT LOCATION:** Playa Vista Area B between Culver Boulevard and Ballona Channel, Playa del Rey, Los Angeles County

**DESCRIPTION OF PROJECT PREVIOUSLY APPROVED:**

- 1) Develop a 26.1 acre freshwater marsh restoration project;
- 2) to have Coastal Commission accept proposed freshwater marsh restoration and proposed riparian corridor restoration which is outside of the Coastal Zone as a mitigation of future development proposals in other areas of the Ballona wetlands;
- 3) to have Coastal Commission adopt a recent delineation of wetland habitat in Area A of Ballona wetlands.

**PROPOSED AMENDMENT:** The proposed amendment is a request to scrape and existing asphalt road bed known as old Culver Boulevard, and also a portion of the old Pacific Electric Railway berm to create a 2000 foot long haul route for surcharge site for a culvert draining the approved freshwater marsh. The applicant also proposes to remove illegally dumped debris from the immediate vicinity of drainage structure and surcharge berm. Work started on the proposed road and clearance operation in the spring of 1998.

**STAFF RECOMMENDATION:**

Staff recommends that the Commission find that the haul road proposed in this amendment to the approved permit is consistent with the policies of the Coastal Act. The project raises no issues of compliance with Coastal Act policies protecting wetlands or other sensitive areas.

## SYNOPSIS

This project represents a minor addition to an already approved, issued and vested coastal permit enabling the applicant, Playa Vista Capital, to construct a freshwater marsh restoration. The underlying permit 5-91-463, was approved by the Commission in 1991. That permit was opposed at the time of its issuance on grounds that it was part of a larger project that would result in development of the Playa Vista property, a 914 acre property that is located both in the City of Los Angeles and in Marina del Rey located in an unincorporated area of Los Angeles County. Approximately 544 acres of the of the Playa Vista property are located in the Coastal Zone. These 544 acres are divided into three plan areas, Area A, Area B, and Area C (Exhibit 6.) Area A is located in the County and Areas B and C are now located in the City of Los Angeles. This project is located in Area B, where no less than 163 acres of wetland area proposed for restoration under the terms of the certified LCP. Work started on the proposed access road and clearance operation in late spring, 1998.

Even though the issue of the underlying permit 5-91-463 is not before the Commission, there remains considerable public discussion on the possible impacts of this and any other development, even freshwater marsh restoration, on the wetland. The project is located in an area that is a historic wetland. Many members of the public contend that the Commission should prevent development on all areas that were at one time wetlands and even areas that were at one time in the flood plain of Ballona Creek. However, in 1984, the Commission approved an LUP that included a wetland delineation for this area. The certified LUP proposes development in areas that Fish and Game determined were not presently wetland and were not restorable (Exhibit 3.) The proposed road and the proposed drain culvert and associated surcharge fill are located in areas determined by the Department of Fish and Game in 1982, 1983 and again 1984 to be nonrestorable historic wetland, and not, currently, a wetland. Based on that determination the Commission, in 1984, certified a Land Use Plan designating the area to be occupied by the freshwater marsh and the proposed drain culvert for residential development. A court challenge to the Commission's certification of the Land Use Plan was resolved in part by the development of lands previously designated for urban development as a freshwater marsh. The marsh was approved in the Commission's action on the present permit 5-91-463 and is under construction.

In order to develop a freshwater marsh, which also serves to prevent polluted runoff from inundating the salt marsh, it is necessary for the marsh to drain. The drain culvert now under construction is that drain. Because of the nature of the soils in the area, it is necessary to surcharge the soils before the drain is placed under ground. To surcharge the soil the applicant proposes to place approximately 25,000 yards of soil in a berm over the culvert. Trucks carrying this soil are

required by the City of Los Angeles Department of Transportation (DOT) to enter at the site at a signaled intersection of Jefferson and Culver Boulevards for traffic safety. The applicant discovered and scraped an abandoned asphalt road to serve as a haul route. (Exhibit 2) As a result of a site visit, staff determined that the grading and the other work taking place outside the footprint of the approved culvert and marsh require an amendment to the permit. After meeting in the field with the staff, the applicant stopped work on the berm and applied for a permit.

Although there is controversy on the matter, the proposed road is not located on any wetlands identified by the Department of Fish and Game or by the US Army Corps of Engineers as presently a wetland. (See Exhibits 2 and 3.) In 1982, 1983 and again in 1984, the Department of Fish and Game studied the area and submitted a letters and maps, indicating that the land subject to this application may be a historic wetland, but is not at this time a wetland as defined by Sections 30121 of the Coastal Act.

---

**PROCEDURAL NOTE:** The Commission's regulations provide for referral of permit amendment requests to the Commission if:

1. The Executive Director determines that the proposed amendment is a material change,
2. Objection is made to the Executive Director's determination of immateriality,
3. or the proposed amendment affects conditions required for the purpose of protecting a coastal resource or coastal access.

In this proposed amendment to a conditionally approved permit, the proposed revisions are material changes which significantly enlarge the area of disturbance that was described to the Commission in the original staff report and findings..

Section 13166 requires that an application for amendment shall be rejected if, in the opinion of the Executive Director, the proposed amendment would lessen the intended effect of a partially approved or conditioned permit unless the applicant presents newly discovered material information, which he could not with reasonable diligence have discovered and produced before the permit was granted.

The Executive Director, in accepting the amendment, found the proposed amendment can be accepted consistent with Section 13166 of the Code of Regulations because the need for the road is based on determination by a public agency, the Los Angeles City Department of Transportation , that had made no determination of haul routes in advance of the Commission's action. Because it would enlarge the area graded as part of the project, this amendment has been

referred to the Commission. However, this enlargement is confined to areas on the property that the Commission and the Department of Fish and Game have determined are not wetlands and that the Commission has determined may be developed with urban uses. The proposed road does not extend into any area that the Commission previously determined was sensitive habitat or wetland as defined in the Coastal Act and is consistent with the intent of the approved permit. Therefore, the Executive Director has accepted the proposed amendment for processing.

---

#### **STANDARD OF REVIEW:**

The applicant proposes to amend a permit approved by the Commission in advance of certification of the local coastal program for the area. Therefore the standard of review are the policies of Chapter 3 of the Coastal Act.

#### **DESCRIPTION OF PREVIOUS AMENDMENTS**

SEE APPENDIX A Previous amendments changed the definition of successful completion of wetland restoration, and required additional monitoring before release of mitigation credits.

---

#### **SUBSTANTIVE FILE DOCUMENTS:**

1. California Department of Fish and Game, E.C. Fullerton, Director, "Determination of the Status of the Ballona Wetlands," Los Angeles County California, December 1, 1982.
2. California Department of Fish and Game, E.C. Fullerton, Director, Department response to the Coastal Commission's April 15, 1983 letter re Ballona, May 13, 1983
3. California Department of Fish and Game, H.D. Carter, Director, County of Los Angeles Local Coastal Program, Marina Del Rey Ballona Land Use Plan, (LUP) review of staff report date October 7, 1983, October 27, 1983
4. California Department of Fish and Game, H.D. Carter, Director. Los Angeles County Marina del Rey Ballona land use Plan Department of Fish and Game Comments on the Summa Corporation Howard Hughes Realty proposal regarding the wetlands and other environmentally sensitive areas, January 4, 1984

5. California Coastal Commission; County of Los Angeles Local Coastal Program, Marina del Rey Ballona LUP Adoption of Revised Findings of Denial and Adoption of Suggested Modifications. April 25, 1984
6. California Coastal Commission; City of Los Angeles Local Coastal Program Playa Vista segment LUP Adoption of Revised Findings for Denial and Certification of Land Use Plan with Suggested Modifications. December 19, 1986
7. Agreement for Settlement of Litigation in the 1984 Case of Friends of Ballona wetlands, et al. v. the California Coastal Commission, et al. Case No. C525-826
8. 5-91-463 (Maguire Thomas Playa Vista;) Condition Compliance 5-91-463; 5-91-463-A-2

---

#### STAFF RECOMMENDATION

The staff recommends that the Commission adopt the following resolution:

##### I. APPROVAL WITH CONDITIONS

The Commission hereby grants an amendment to the permit for the proposed development on the grounds that the proposed development with the proposed amendment will be in conformity with the policies of Chapter 3 of the Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

Note: the Commission's action in approving this amendment does not change any of the previously adopted standard or special conditions imposed by the Commission on this project.

## **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 (APRIL 15, 1993). 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. **Compliance.** All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. **Inspections.** The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. **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.
7. **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. FINDINGS AND DECLARATIONS**

The Commission finds and declares as follows:

### **A. PROJECT HISTORY AND DESCRIPTION OF AMENDMENT**

On September 13, 1991 the Commission approved 5-91-463 (Maguire Thomas) an application by Maguire Thomas partners, the present applicant's predecessor in interest, to restore a 26.1 acre freshwater marsh, impacting 6.9 acres of wetlands. (Exhibit 7) The project included a six foot by ten foot drain culvert and a low berm to ensure that excessive freshwater would not flow into the Ballona saltmarsh and

reduce the salinity of the marsh. The project drain was planned to discharge into the Ballona channel. Since the proposed salt marsh was separated from the Ballona Creek channel by agricultural lands designated for future development the drain was proposed to be routed in a culvert under Jefferson and Culver Boulevards and under the undeveloped property and to empty into the channel.

The applicant, after some delays, began construction. When the applicant constructed the first part of the drain, some controversy arose and the staff determined that the drain, and the associated surcharge was part of the project because it appeared on a map provided by the applicant to the staff and the Commission, and also had been discussed in materials addressing the hydrology of the project. The applicant constructed the portion connecting Jefferson Boulevard to Culver Boulevard, and then stopped work, because early walk overs had determined that further archaeological investigation was necessary to determine origin of some shell deposits. In the spring of 1998 the applicant's archaeologist investigated the shell deposits and determined that they were not of midden, instead they were construction debris from construction of the channelization of Ballona Creek. In late spring 1998, the applicant resumed construction of the culvert and the berm. At that time the City of Los Angeles Department of Transportation (DOT) notified the applicant that it was required to enter the property from the intersection of Culver and Jefferson Boulevards where the intersection is signalized. Because over 25,00 yards were required for the surcharge there would be a great many trucks, and the DOT was concerned about traffic safety. The surcharge was necessary because of the nature of the soils which would, if not compacted, cause the culvert to pop up out of the ground.

The applicant then scraped off an abandoned road, old Culver Boulevard, for a haul route and constructed a parallel route along an old railway embankment. Staff was contacted that the applicant was grading in the wetland. At a site visit staff determined that the applicant was not grading in a wetland but that the applicant was grading outside the area of the original permit. The applicant, at the request of the staff, stopped work and requested to amend its permit to include the road. The road is about 20 to 25 feet wide, and including its two forks a total of 2000 feet long. The applicant also, took the opportunity to remove construction debris, abandoned appliances and solid waste, from the property. That work extended the area of grading and disturbance. The area in question was historically farmed. In 1982 and 1984 it was determined to be historic wetland but non restorable wetland by the Department of Fish and Game. Since the area is undeveloped and birds such as herons forage on it, and also it becomes saturated in the rainy season, the entire Area A is believed by some members of the public to be a wetland now.

**B. WETLANDS AND OTHER SENSITIVE HABITAT AREAS**

The Coastal Act defines a wetland in section 30121, which states that:

a wetland is land in the Coastal Zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats and fens.

Coastal Act Section 30233 limits development in wetlands and Section 30240 requires the Commission and local government in developing land use plans to protect both wetlands environmentally sensitive habitat areas. In determining whether or not an area is a wetland or environmentally sensitive habitat the Commission relies on the advice of the Department of Fish and Game. The Department determines that if an area has one of three wetlands indicators: shallow water, hydric soils, or predominant hydrophytic plants it is a wetland. Areas that are historic wetlands that no longer support one of the three indicators are determined not to be wetlands.

At the time of the certification of the Marina del Rey LCP, the Department of Fish and Game mapped the area of the Playa Vista property that could now be considered wetland. (See Exhibit 3) The determinations are cited as substantive file documents. Following this advice, the Commission determined that there were 152.1 acres of existing wetlands in the coastal zone in Playa Vista. This area included Area B, the planning area of the property in which the development is proposed and Area A, a portion of the property lying south and north of the channel in Los Angeles County jurisdiction. The Department also determined that there were 51.3 acres of feasibly restorable wetlands located in Area B. Ultimately the LUP provided that there should be 163.4 acres of wetlands and about 40 acres of buffer restored in Area B and a boating facility constructed on land located in the County. This decision was challenged in court, and as part of the settlement, the land owner agreed to construct 52.1 acres of restored freshwater wetland along the Centinela creek drainage which is located inside and outside the coastal zone. Twenty six and a tenth acres of that marsh were to be located in Area B inside the coastal zone in an agricultural area designated for residential development in the certified LUP. The land owner also agreed to restore additional salt marsh in Area B over and above that required in the certified LUP. The freshwater marsh that is subject to this permit is a result of that settlement. (Agreement for Settlement of Litigation in the 1984 case of Friends of Ballona wetlands, et al. v. the California Coastal Commission, et al. Case no. c525-826)

The marsh was approved in the Commission's action on the present permit 5-91-463 and is under construction.



In order to develop a freshwater marsh, which also serves to prevent polluted run off from inundating the salt marsh, it is necessary for the marsh to drain. The drain culvert now under construction is that drain. Because of the nature of the soils in the area, it is necessary to surcharge to the soils before the drain is placed under ground. To surcharge the soil the applicant proposes to place approximately 25,000 yards of soil in a berm over the culvert.

The marsh itself was approved by the Commission in 1991. In its approval in 1991, the Commission allowed displacement of 6.9 acres of fresh and saltwater wetland in the Coastal zone and its replacement by 26.1 acres of freshwater marsh. That decision was opposed at the time on grounds that it committed development of the larger property, and also because in the view of some it would not result in viable and productive habitat. The Commission considered these objections in 1991 and approved the project because 1) it was an allowable use under section 30233, 2) it was part of a settlement that would result in a more extensive wetland than the Commission had previously approved, and 3) there was also evidence that the freshwater marsh would provide viable habitat and would be consistent with the habitat policies of the Coastal Act.

This road extension and debris removal are not located in any area described by the Department of Fish and Game or by the Corps of Engineers as a wetland. Because it is located on asphalt it will not disturb significant vegetation. Adjacent vegetation is dominated by grasses and introduced weeds. (Exhibit 5.a) As such the proposed development is consistent with Sections 30233 and 30240 of the Coastal Act.

### **C. UNPERMITTED DEVELOPMENT.**

Although some development on the site, namely the scraping of the road and the removal of solid waste, may have taken place without a valid Coastal Development Permit, consideration of the amendment application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Review of this amendment to the permit does not constitute a waiver of any legal action with regard to any violation of the Coastal Act that may have occurred. The Commission will act on this application without prejudice and will act on it as if none of the existing unpermitted development had previously occurred. On this permit, in acting on the original application, the Commission's analysis centered on the project's conformity with the wetlands policies of the Coastal Act, why the Commission could approve a restored freshwater wetland in an area designated for urban development in the certified LUP, and the extent to which successful completion of the freshwater marsh could enable the applicant or its successor in interest to use the freshwater marsh for mitigation of any impacts of the development on the salt marsh.

If the freshwater marsh were deemed a viable habitat it could be used as mitigation for the project's other impacts on wetlands. As result, the remainder of the project would be eligible for funding from the ports to establish a full tidal restoration of the saltmarsh. Most analysis of the project in the underlying permit was concerned with establishing guidelines for monitoring the viability of the freshwater marsh once established and the necessary analysis of mitigation and of impacts. The construction details were described briefly, without specific details, such as anticipated methods for installation of the culvert. The staff has interpreted the permit as granting permission for all work that was directly within or immediately adjacent to the footprint of the project as shown on the exhibit showing the freshwater marsh and the relevant plans (Exhibit 7). This road is necessary to construct the project approved in the Commission's action but lies outside the approved foot print. To assure that the Commission and the public receive notice of the full extent of the project, the applicant has filed for an amendment to the project.

**D. PREJUDICE TO PREPARATION OF A LOCAL COASTAL PROGRAM.**

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a local coastal program which conforms with chapter 3 policies of the coastal act. The Commission has approved both the City of Los Angeles and the County of Los Angeles LUP's for the area affected by the proposed project. As described above, the approved project differs from the adopted LUP in that it would place a wetland in a location identified for urban development. The culvert and the proposed haul roads are located in an area slated for urban development, but their development would not preclude urban development as described in the certified Land Use Plans. The Commission found that its different action on the underlying permit is consistent with the wetland policies of the Coastal Act and is more protective of coastal resources than the adopted LUP's. Therefore, the Commission finds that this permit, as amended, will not prejudice the ability of the local government to prepare a Local Coastal Program that is consistent with the Coastal Act. The Commission notes however, that both the City and County of Los Angeles must amend their LUP's to incorporate and reflect the Commission's action on this permit before the Commission can certify the applicable implementing ordinances.

**E. California Environmental Quality Act**

Section 13096(a) of the Commission's regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA).

Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The project is located on one of the last undeveloped historic wetlands in Los Angeles County. In the Commission's action on the Land Use portion of the Local Coastal Program, the Commission identified the wetlands and mitigation measures that would fully mitigate any impacts on the wetlands. While federally-listed endangered species, the Brown Pelican and the least tern, feed in nearby creek channel and off shore areas and the State-listed Belding Savannah Sparrow nests nearby in a Salicornia marsh, none of these animals have been identified on the site of the development or the proposed site identified in this amended permit, nor has the Commission received any information in its previous action that this project will in any way affect these animals. Numerous studies have been undertaken concerning these issues, and the original permit has been conditioned to assure that the project will not have a significant adverse impact on resources. Alternatives, such as entering the property at the conjunction of the drain and Culver Boulevard have been considered and rejected for traffic safety reasons.

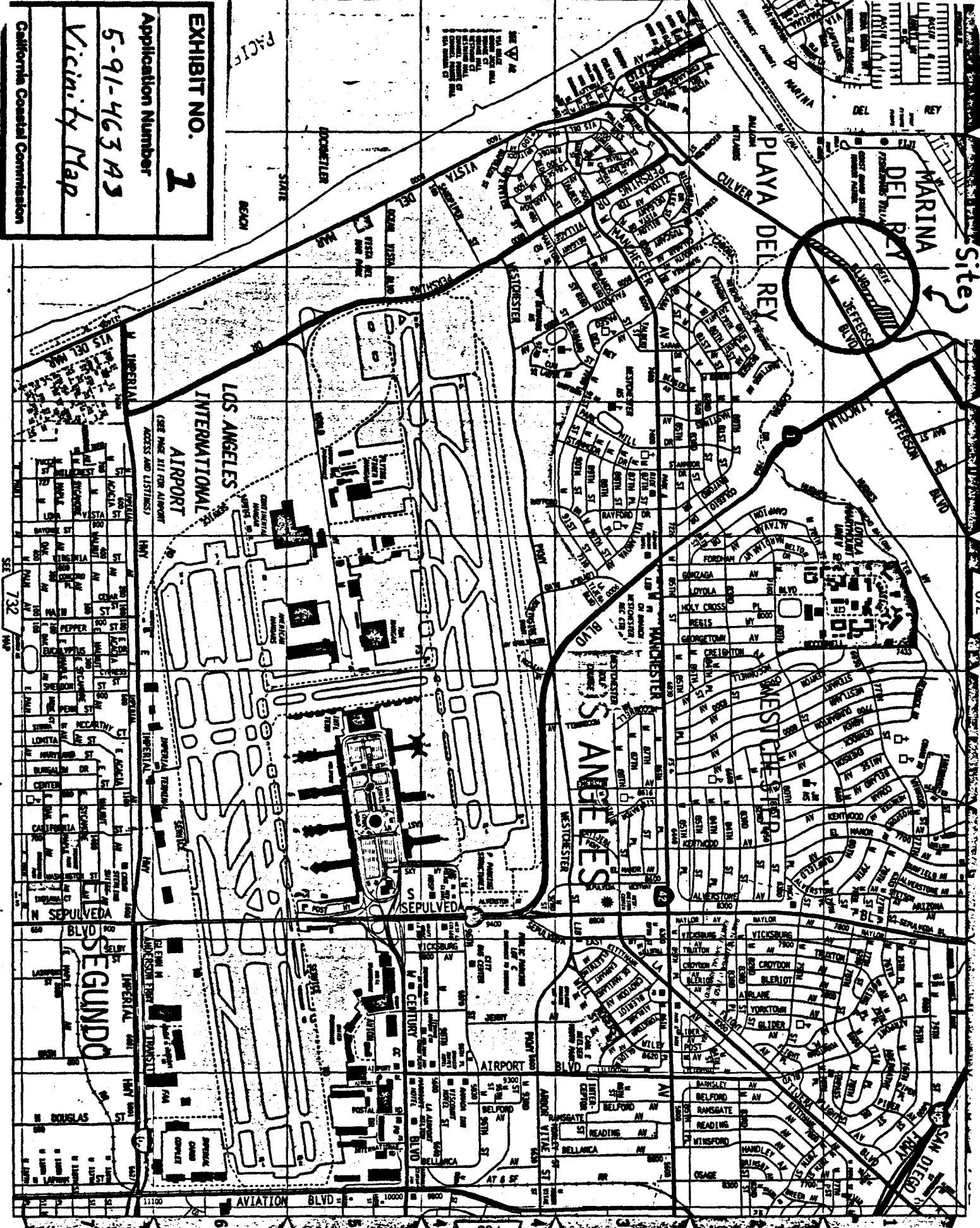
The haul road proposed in this amendment to the approved permit is consistent with the policies of the Coastal Act of 1976 and the policies of the certified LUP. There are no other feasible mitigation measures or alternatives which would lessen any significant adverse impact the activity would have on the environment. Therefore, the Commission finds that the proposed project is consistent with CEQA and the policies of the Coastal Act.

EXHIBIT NO. **1**

Application Number  
**5-91-46343**

Vicinity Map

California Coastal Commission



2

5-91-463A3

## Site Plan

**California Coastal Commission**

REMOVE ILLEGALLY OBTAINED  
RUBBISH AND DEBRIS

SCAFFOLD CLAY  
BLVD. EXISTING  
ASPHALT ROADBED

PROPOSED SURCHARGE  
PERMITTED UNDER COP 5-91-463  
1x STOOP/ILE CENTERED  
ON THE SPALTER WASH DRAIN

**PROPOSED SILL FENCE -  
LOCATED 20 FEET FROM  
TOE OF PROPOSED DRAIN**

**SCAPE Q.O EXISTING**  
**PACIFIC ELECTRIC**  
**RAILWAY BEARS**

Los Angeles City Planning  
ASTA: ZONE PLAN

**APPROVED**

## Approved in Concept

Exposition 1904

Exclusion No.

1

16-27

Collected C. 36(3) \_\_\_\_\_

~~Out of Jurisdiction~~

1

~~Not applied or~~

...~~Adel~~ process complete

Dr.  Date: 

1/2

1



100

\_\_\_\_\_

---

\_\_\_\_\_

\_\_\_\_\_

# CLEAR ACCESS ROAD TO STOCKPILE

# PSOMAS







DATE: 06/22/06 REVISED ON:  
FOR NEW INFORMATION: 000

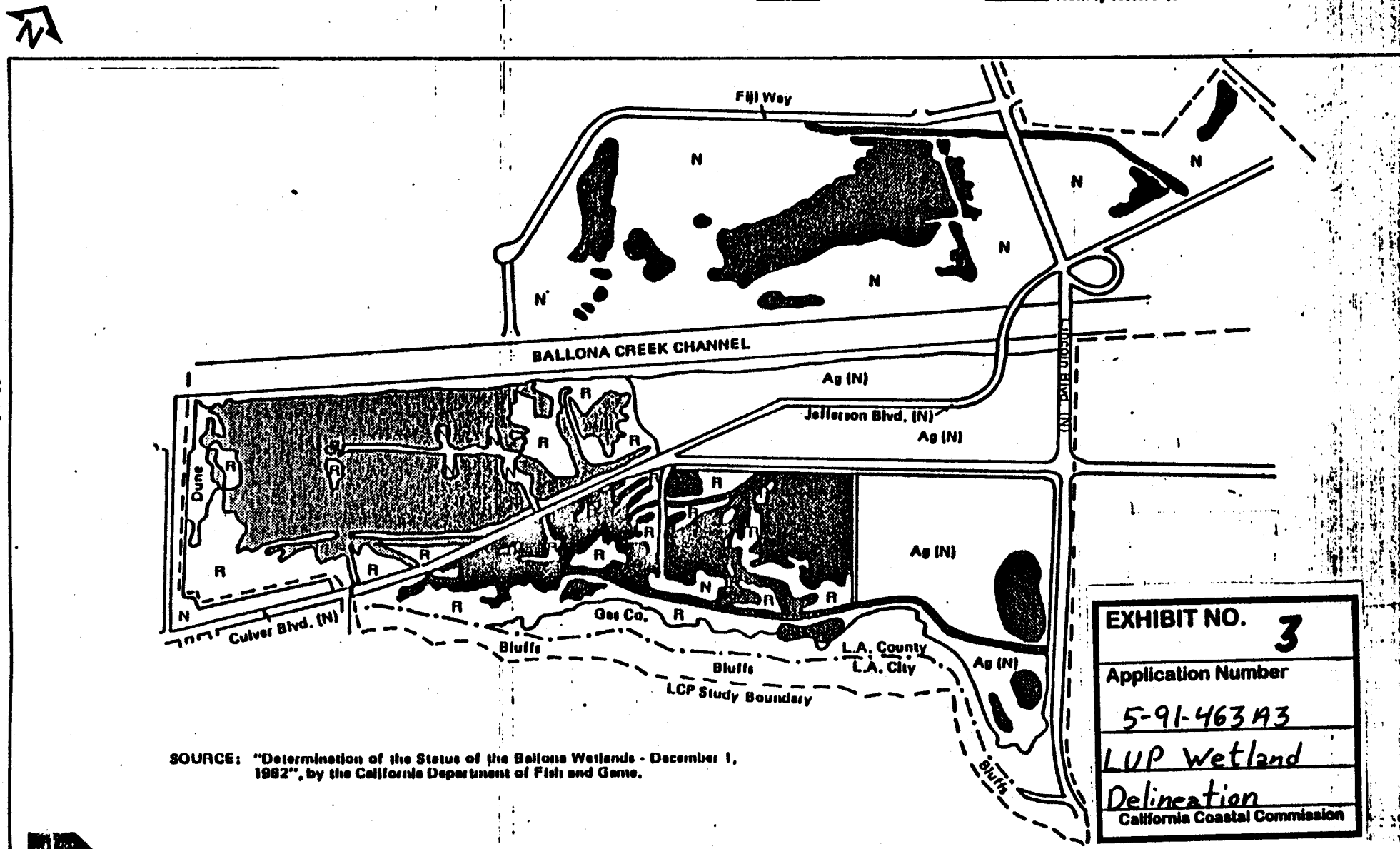
PV 733-01

00

map 14

PRESENT STATUS OF THE BALLONA REGION

- |  |  |  |
|--|--|--|
|  Non-degraded wetland |  Feasibly restorable former wetland     |  Former wetlands Agricultural Field |
|  Degraded wetland     |  Former wetland not feasibly restorable |  Environmentally sensitive upland   |



SOURCE: "Determination of the Status of the Ballona Wetlands - December 1, 1982", by the California Department of Fish and Game.

EXHIBIT NO.	3
Application Number	5-91-463 A3
LUP Wetland	
Delineation	
California Coastal Commission	

AREAS TO BE CLEARED:  
 [Hatched Box] OLD EXISTING PACIFIC RAILWAY BED  
 [Dashed Box] OLD EXISTING PACIFIC RAILWAY BED  
 [Dotted Box] TERRAIN DURING REMOVAL AND DEMOLITION

LEGEND:  
 [Solid Black Box] FEDERAL REGULATED WETLANDS

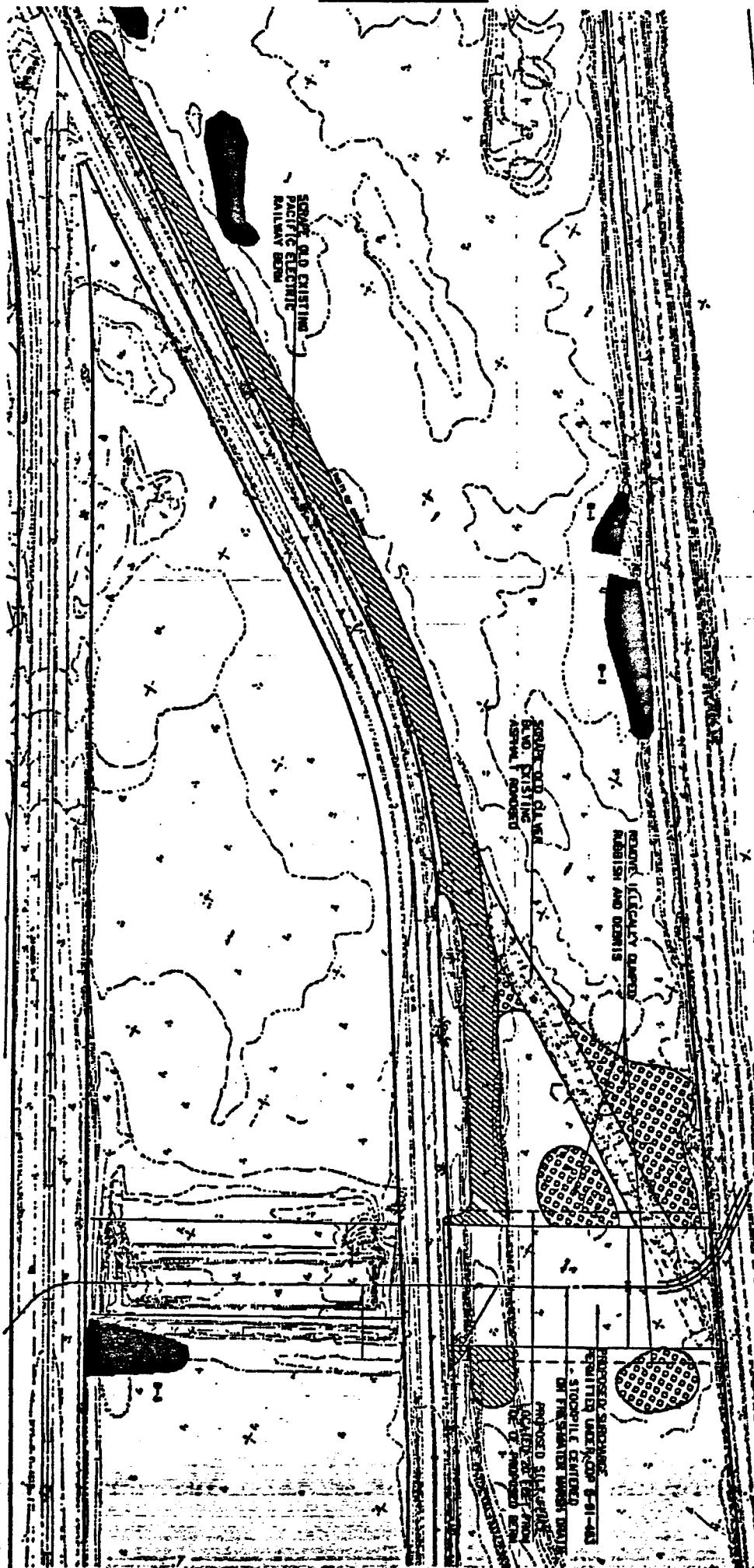


EXHIBIT NO.

4

Application Number

5-91-463 H3

Federal Delineated

Wetlands

California Coastal Commission

CLEAR ACCESS ROAD TO STOCKPILE



# BALLONA CREEK CHANNEL

EXHIBIT NO. **5.a**

Application Number

**5-91-463193**

*Site Vegetation Map*

*Draft EIS/EIR - Plaz2*

*Vista Project 11/6/98*



**Estuarine Habitats:**  
 OPEN SALT FLAT  
 SALT MARSH

**Transitional Habitats:**  
 WEEDS/COASTAL SCRUB  
 SALT MARSH/SALT GRASS  
 FRESHWATER MARSH/  
 TERRESTRIAL TRANSITION

**Freshwater Habitats:**  
 WILLOW COMMUNITY  
 SAGE WILLOW THICKETS  
 CHANNEL/FRESHWATER MARSH  
 CHANNEL/MUDFLAT

**Terrestrial Habitats:**  
 OPEN DISTURBED/WEEDS  
 ICEPLANT  
 WEEDY FIELD/WEEDS  
 GRASSLAND/HERBS

**Non-Native Plants:**  
 NON-NATIVE SHRUBS  
 COASTAL DUNE  
 EUCALYPTUS

Playa Vista EIS/EIR Vol. 3  
 Affected Environment



**FIGURE D-4  
 SITE VEGETATION-AREA B WEST END**

Source: Dr. E. Reed based on Dr. J. Harshbarger, 1982.





**EXHIBIT NO.** 5.6  
**Application Number** 5-91-463193  
**Site Vegetation Map**  
 California Coastal Commission

- Esuarine Habitats:**  
 SALT MARSH  
**Transitional Habitats:**  
 SALT MARSH/SALT GRASS  
**Freshwater Habitats:**  
 SEEPWILLOW THICKETS  
 WILLOW COMMUNITY  
 FRESHWATER MARSH  
**Terrestrial Habitats:**  
 OPEN DISTURBED WEEDS  
 COYOTE BUSH  
 ICE PLANT  
 EUCALYPTUS  
 GRASSLAND/HERBS

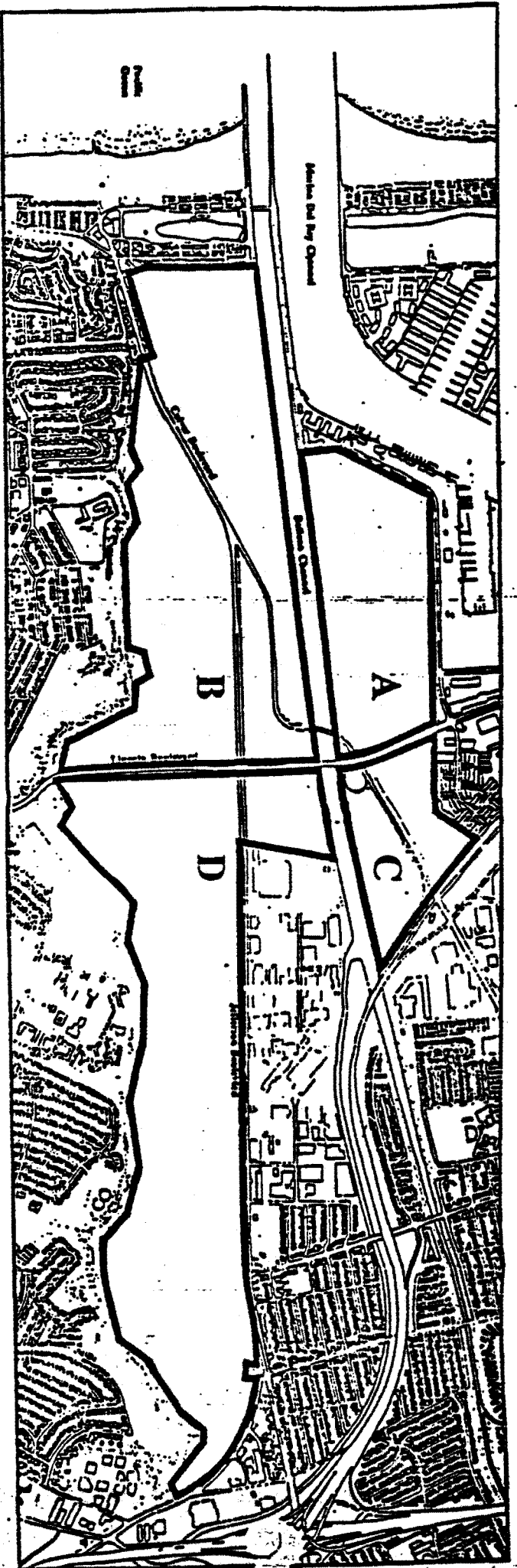
MATCH LINE - SEE FIGURE V.D.-2

Playa Vista EIS/EIR  
 Affected Environment  
 Vol. III  
 PCR

Source: Dr. E. Reed based on Dr. J. Henrichson, 1992.

FIGURE D-1  
 SITE VEGETATION-AREA B EAST END

# Exhibit B



## PLAYA VISTA - Site Area

EXHIBIT NO.	6
Application Number	5-91-463A3
California Coastal Commission	

85

۷

subject

**Commission**



# Testimon

Colvert

Culver

13. V.D.

Ballons Channel

四

**PLANS VISTA**

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

