

CALIFORNIA COASTAL COMMISSION

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

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Commission Action:

**Item Th20b****RECORD PACKET COPY****STAFF REPORT: PERMIT AMENDMENT****APPLICATION NUMBER:** 5-92-377-A1**APPLICANT:** City of Los Angeles Department of Public Works**AGENT:** James E. Doty, Environmental Supervisor**PROJECT LOCATION:** Public rights-of-way of Linnie, Howland, Sherman, Eastern, Grand (north of Washington Blvd.), and Carroll Canals, Venice, City of Los Angeles.**DESCRIPTION OF PROJECT ORIGINALLY APPROVED ON OCTOBER 14, 1993:**

The Venice Canals boat dock plan, which establishes dock design parameters and allows one residential boat dock per residence with a maximum of 175 docks allowed in seven years (1994-2000) on a first-come, first-served basis.

DESCRIPTION OF AMENDMENT REQUEST:

Amend Special Condition Six of Coastal Development Permit 5-92-377 in order to extend the time period during which private residential boat docks are permitted to be constructed in the Venice Canals.

SUMMARY OF STAFF RECOMMENDATION

Between 1993 and December 31, 2000, Commission staff signed-off plans for the construction of nineteen docks following the process established by Special Condition Three of the underlying permit (See Page Three). A recent survey counted 75 non-permitted docks in the Venice Canals. Approval of this amendment request will provide the City with the opportunity to properly permit, or remove, all docks in the canals.

Staff recommends that the Commission approve the amendment with a revised set of special conditions. As conditioned, the amendment would authorize the permitting and construction of small boat docks (up to a total of 175) in the Venice Canals during a term to commence upon the City's submittal of an operating plan for the Grand Canal public boat launch. Special Condition Six, as revised, would allow docks to be permitted and constructed under the terms of the amended permit until December 31, 2002. Prior to applying for a subsequent term, the City shall submit a monitoring plan to the Commission which documents the results of the City's continuing efforts to eliminate and prevent the construction of non-permitted docks.

The City agrees with the staff recommendation. **See page two for motion** to carry out the staff recommendation.

SUBSTANTIVE FILE DOCUMENTS:

1. City of Los Angeles Land Use Plan for Venice.
2. Coastal Development Permit 5-92-377/A5-VEN-92-377 (Venice Boat Docks).
3. Coastal Development Permit 5-91-585 & amendments (Venice Canals Rehabilitation).

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, or
3. The proposed amendment affects conditions required for the purpose of protecting a coastal resource or coastal access.

In this case, the Executive Director has determined that the proposed amendment affects a condition of Coastal Development Permit 5-92-377/A5-VEN-92-377 that was required for the purpose of protecting a coastal resource and coastal access. If the applicant or objector so requests, the Commission shall make an independent determination as to whether the proposed amendment is material. [14 California Code of Regulations 13166].

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution to **APPROVE** the permit amendment request with special conditions:

MOTION: *"I move that the Commission approve the proposed amendment to Coastal Development Permit 5-92-377 pursuant to the staff recommendation."*

Staff recommends a **YES** vote. Passage of this motion will result in approval of the amendment as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

I. Resolution to Approve a Permit Amendment

The Commission hereby approves the coastal development permit amendment on the ground that the development as amended and subject to conditions, will be in conformity with the policies of Chapter 3 of the Coastal Act, is located between the sea and the first public road nearest the shoreline and is in conformance with the public access and public recreation policies of Chapter 3 of the Coastal Act, and will not have any significant adverse effects on the environment within the meaning of. Approval of the permit amendment complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or

alternatives have been incorporated to substantially lessen any significant adverse effects of the amended development on the environment, or 2) there are no feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the amended development on the environment.

II. Special Conditions

[Note: The following special conditions are the original conditions of Coastal Development Permit 5-92-377/A5-VEN-92-377, as revised by this amendment. The revisions are identified by cross-outs for deleted language (~~deleted~~) and underlining for new language. Only Special Conditions Four and Six are revised by this amendment. All six special conditions, as revised by this amendment, still apply to the approved development.]

1. Maintenance of Wetland Vegetation

The City shall be responsible for maintaining the integrity of the rehabilitated Venice Canals, including the maintenance of the wetland vegetation on the canal banks.

2. Flushing

Prior to issuance of the coastal development permit, the City shall agree in writing to submit a flushing plan for the Venice Canals, subject to the review and approval of the Executive Director, within nine months of Commission action. The flushing plan shall be developed in consultation with the Department of Fish and Game and in cooperation with Los Angeles County and the private owners of Lot R in Ballona Lagoon, and shall maximize fresh seawater circulation throughout the Venice Canals/Ballona Lagoon system. The plan shall include details regarding the operation of the tidal gates located at Washington Boulevard and Via Marina, and shall include a schedule for the opening of the gates and how long they shall remain open.

3. Authorization to Construct Docks

The approval of Coastal Permit A5-92-377 authorizes only the City of Los Angeles, as applicants, to construct docks consistent with the Venice Canals boat dock plan approved by the Coastal Commission. Venice Canal residents may request Coastal Commission authorization to construct a dock in front of their residence by submitting the following to the Coastal Commission:

- a. The City's request to assign the rights to undertake the development as it pertains to lands seaward of the assignee's property;
- b. An application for the assignment of Coastal Permit A5-92-377 (consistent with Section 13170 of the California Code of Regulations), as it pertains to lands seaward of the assignee's property, from the City of Los Angeles to an individual resident (or pair of residents) for the construction of a private residential boat dock;

- c. An affidavit executed by each assignee attesting to the assignee's agreement and legal ability to comply with the terms and conditions of Coastal Permit A5-92-377 for the Venice Canals boat dock plan as approved by the Coastal Commission; and,
- d. City approved plans for the construction of a dock consistent with the Venice Canals boat dock plan as approved by the Coastal Commission. The City approved plans shall show the location of the proposed dock.

4. Public Boat Launch

No private residential docks shall be permitted or constructed in the Venice Canals until the public boat launching ramp and parking lot at the northern end of the Grand Canal is under construction. Signs, subject to the approval of the Executive Director, shall be posted which state that the boat launch facility is available to public.

Prior to issuance of the permit amendment, and within sixty days of Commission action on the amendment, the City shall submit, for the review and approval of the Executive Director, a City plan for the operation of the public boat launching ramp and parking lot located at the northern end of the Grand Canal. The plan shall include signage and the specific terms for public access and use of the facility. At a minimum, the facility shall be open for public boating and vehicular access (for transportation of boats to and from launch ramp) between the hours of 8 a.m. and sunset on all days. The City shall implement the plan as approved by the Executive Director.

5. Public Walkways

There shall be no obstruction of the public walkways along the Venice Canals. The storage of boats or other items within the public walkways is prohibited. All conditions relating to continued public use of Dell Avenue, the canal walkways, and alleys applied to this permit and previous permits shall still apply.

6. Permit Term

~~Coastal Permit A5-92-377 shall expire on December 31, 2000. Any application for an amendment or a new Coastal Permit shall be analyzed for cumulative impacts associated with boat docks and recreational use of the canals.~~

The time period during which private residential boat docks may be permitted to be constructed in the Venice Canals pursuant to Coastal Development Permit A5-92-377 and Amendment 5-92-377-A1 shall expire on December 31, 2002. Prior to December 31, 2002, the City shall submit a monitoring report to the Executive Director which documents the location and number of permitted and unpermitted dock structures in the Venice Canals. The monitoring report shall include an analysis of the City's current and past efforts to eliminate and prevent unpermitted dock structures in the canals. Upon submittal of the monitoring report to the Executive Director, the City may apply to the Commission for a permit amendment in order to extend the time period during which private residential boat docks may be permitted to be constructed in the Venice Canals.

III. Findings and Declarations

The Commission hereby finds and declares:

A. Amendment Description and Background

On October 14, 1993, the Commission approved Coastal Development Permit 5-92-377/A5-VEN-92-377 (City of Los Angeles) for the implementation of a boat dock plan for the Venice Canals (See Exhibits). The approved permit established dock design parameters and allowed one residential boat dock per residence (with a maximum of 175 docks) to be permitted during a seven year term which ended on December 31, 2000. The permit term was established by Special Condition Six of Coastal Development Permit 5-92-377/A5-VEN-92-377.

The City is now requesting to amend Special Condition Six of Coastal Development Permit 5-92-377/A5-VEN-92-377 in order to extend the time period during which private residential boat docks are permitted to be constructed in the Venice Canals. The City proposes a new term that would expire on December 31, 2007.

The previously approved boat dock plan was developed to establish a procedure for the permitting of a limited number of private residential boat docks in the Venice Canals (Exhibit #3, p.1). The adoption of a single master boat dock plan for all docks in the canals was intended to minimize the cumulative impacts on canal resources that could have resulted from the construction of individual docks under several individual permits. The approved dock plan established specific design parameters for docks and a maximum limit of 175 docks in order to allow and encourage recreational boating uses while protecting marine resources and the wetland vegetation that has been established on the canal banks.

The specific dock location standards, dock design parameters and size standards for boats were established in the approved boat dock plan. The plan allows one boat dock to be constructed anywhere within the segment of canal which corresponds to a property owner's lot lines. However, if any dock is proposed within six feet of an adjacent lot's frontage, the dock builder must receive written consent from the adjacent property owner. Two adjacent property owners may build a shared dock, but in order to do so, they must forego their privilege to build individual docks. The following are the Commission-approved design parameters for docks in the Venice Canals located north of Washington Boulevard:

- Overall dock width: 5'0" maximum
- Overall dock length: 5'8" maximum (measured from top of slope)
- Foundation of reinforced concrete
- Foundation footprint no larger than standardized plan specifications
- No fixed roofs or canopies
- Required safety barrier on all four sides
- Required self-latching gate:
 - Minimum height: 2.5 feet
 - Maximum height: 3.5 feet
 - Maximum width: 5.0 feet

The City currently proposes to authorize the use of three similar types of dock designs that comply with the above-stated design parameters (Exhibit #2). The small size of each dock (5'x 5'8" maximum) provides enough area for a person to access a boat from the banks of a canal, but also limits the amount of area in the canals that is occupied by docks. Each dock is supported by the canal bank (Loffelstein blocks) and two six-inch diameter piles placed on the gravel toe of the canal bank (Exhibit #2). At low tide, the entire dock structure (including the support piles) is above the water line, thus limiting the dock's impacts on marine resources and maintaining a wide channel for recreational boating.¹

The approved dock plan has a limit of one dock per canal fronting lot. The specific dock locations are not identified in the dock plan because the plan includes a limit of 175 docks for the 383 canal fronting lots. Because the 175 proposed docks would be permitted by the City on a first-come, first-served basis to the residents who apply for City permits, the specific locations of the proposed docks are not yet known.

The plan also requires utilization of specified construction methods which are designed to minimize the potential for adverse environmental impacts associated with the construction of the boat docks in the canals. Construction must occur during low tide and fast drying concrete must be used for the pile supports. No construction debris of any kind can be left in a canal. Additionally, the City requires each resident who constructs a dock to maintain a one million-dollar liability insurance policy for the dock.

The City prohibits the use of motorized boats in the Venice Canals, and also limits the size of non-motorized boats. The approved plan includes the following size standards for non-motorized boats in the Venice Canals:

Maximum boat length:	18.0 feet
Maximum boat width:	6.0 feet
Maximum length plus width:	21.0 feet
Maximum draft:	2.0 feet
Maximum height:	3.5 feet above water line
Maximum draft plus height:	4.0 feet above water line

During the first term of the Commission approved project (1993 until December 31, 2000), Commission staff signed-off plans for the construction of nineteen docks following the process established by Special Condition Three of Coastal Development Permit 5-92-377/A5-VEN-92-377 (See Page Three). The City surveyed the canals in 2001 and found a total of eighty docks in the Venice Canals: five permitted docks and 75 non-permitted docks (Exhibit #3, p.8). A non-permitted dock is one that is not authorized pursuant to the process described in Special Condition Three of Coastal Development Permit 5-92-377/A5-VEN-92-377 (Exhibit #3, p.1).

¹ The Venice Canals Association has inquired about a potential alternative to the construction of private boat docks involving only private access gates and boat tie-ups on the canal bank in lieu of building a private dock (Exhibit #7, p.3). The City has not, however, included this alternative in the current permit amendment request.

Commission records show that eleven of the eighty existing docks are authorized pursuant to Coastal Development Permit 5-92-377/A5-VEN-92-377. Commission staff has confirmed that the vast majority of the existing docks in the canals, including the non-permitted ones, are equal or smaller in size than the maximum dock size (5'x 5'8") dock permitted by Coastal Development Permit 5-92-377/A5-VEN-92-377. Several of the non-permitted docks have been removed from the canals since the City's survey.

B. Description of Project Area

The Venice Canals neighborhood is a predominantly residential community consisting of single family homes located along the open waterways. The neighborhood is located about four blocks from Venice Beach, one of the most popular visitor destinations in Los Angeles (Exhibit #1). The canals, which are public rights-of-way owned by the City of Los Angeles, are a popular Southern California visitor destination. The canals, which were created as part of the "Venice of America" subdivision in 1905, provide a sense of character and history for the Venice community. They also provide public access, recreation opportunities, and wildlife habitat. Recreational boating has historically been part of the Venice Canals culture.

The Venice Canals, along with adjacent Ballona Lagoon, support some of the last remaining pockets of coastal wetland habitat in Los Angeles County. The Venice Canals are part of the Ballona Lagoon sea water system and are connected with Ballona Lagoon via Grand Canal. Water enters the canals system from the Pacific Ocean through two sets of tidal gates at Ballona Lagoon and Grand Canal.

The canals system fell into disrepair in the 1920's, and many of the original canals were filled by the City in 1927. Since the 1960's, residents in the Venice area had been attempting to restore the remaining canals. On November 14, 1991, the Commission approved Coastal Permit 5-91-584 (City of Los Angeles) for the rehabilitation of the Venice Canals. The rehabilitation project, completed in 1993, involved dredging of the canal channels and construction of new canal banks and new public walkways along the canal banks. A public boat launch ramp and parking area was also approved and constructed at the northern end of Grand Canal between North and South Venice Boulevards (Exhibit #1).

C. Public Access

One of the basic goals of the Coastal Act is to maximize public access to and along the coast. The Coastal Act has several policies which address the issue of public access to the coast.

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30213 of the Coastal Act states:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred...

The approved boat dock plan allows the construction of private residential boat docks in the public rights-of-way of the Venice Canals. The plan allows any resident, or pair of residents, with canal fronting property to construct a private dock in front of their homes if they follow the process described in Special Condition Three of Coastal Development Permit 5-92-377/A5-VEN-92-377 (Exhibit #3, p.1). Public access to recreational boating activities in the Venice Canals is provided by the Grand Canal public boat launch and parking lot located at the northern end of the Grand Canal (Exhibit #1).

Private residential docks constructed under the previously approved permit are similar to private boat slips in a marina in that they are located in publicly owned areas, but are reserved for private use. The use of the residents' private docks is restricted to the permittees (residents) and co-permittees who apply for the required City permits and pay for the construction and maintenance of the docks in front of their homes. The permittees are required by the City to place safety barriers and a gate on each permitted dock.

There are several reasons why canal residents prohibit the general public from using the private boat docks. One reason is liability. The residents who decide to build private docks are required by the City to secure property damage and liability insurance with a minimum coverage of one million dollars (per dock). Annual submission of proof of insurance is required to prevent revocation of the City's encroachment permit for a dock. The City and the residents limit the risk of injury and liability by restricting the public from using the docks.

Another reason for restricting the public from using the proposed private docks is that the residents are incurring the costs of permitting, constructing, maintaining, and insuring the docks (Exhibit #3, ps.1-2). No public funds will be used for the construction or maintenance of the private docks. The residents' privacy is a third reason for restricting the use of the docks. Although the docks are situated entirely on City property, the docks are also located near the front yards of people's homes.

Section 30210 of the Coastal Act states that maximum access and recreational opportunities shall be provided for all the people. Therefore, approval of the amendment request shall ensure that public access to the Venice Canals is adequately protected. In order to ensure that the public is not excluded from boating in the Venice Canals, and that the public is given

an equal opportunity to access the Venice Canals for recreational boating, the approval of the amendment request is conditioned so that no private residential boat docks can be permitted or built until the City ensures that public access is being provided to the public boat launching ramp and parking lot at the northern end of Grand Canal.

Special Condition Four of the underlying permit, originally approved by the Commission in 1993, required the City to commence construction of the public boat launch prior to the construction of any private residential boat docks. The public boat launch was constructed and opened in 1994. A few years later, the public boat launch was closed. Commission staff has not been able to confirm when the City began locking the gates to the public boat launch, but the gates have been locked during recent visits by staff.

In order to ensure that the public has equal access to recreational boating in the Venice Canals, revised Special Condition Four states:

Prior to issuance of the permit amendment, and within sixty days of Commission action on the amendment, the City shall submit, for the review and approval of the Executive Director, a City plan for the operation of the public boat launching ramp and parking lot located at the northern end of the Grand Canal. The plan shall include signage and the specific terms for public access and use of the facility. At a minimum, the facility shall be open for public boating and vehicular access (for transportation of boats to and from launch ramp) between the hours of 8 a.m. and sunset on all days. The City shall implement the plan as approved by the Executive Director.

As conditioned, the dock plan will not restrict the public from using the Venice Canals for recreational boating and public boating access in the Venice Canals will be protected as required by the Coastal Act. The public will continue to be able to access the canals with non-motorized boats at the public boat launching ramp approved under Coastal Development Permit 5-91-584 (City of Los Angeles). The public boat launching ramp is located on the northern end of the Grand Canal (Exhibit #1). A seven-space parking area at the public boat ramp provides parking for people using boats while visiting the Venice Canals.

Public access along the public walkways adjacent to the Venice Canals must also be protected. In order to ensure that construction and use of the proposed docks does not inhibit the use of the public walkways, Special Condition Five of the permit prohibits the storage of boats or other items within the public walkways.

As conditioned, the dock plan and the permit amendment will not reduce public access to, along, or through the Venice Canals, and the public will have an equal opportunity to access the canals for recreational boating at the public boat launching ramp. Therefore, the Commission finds that the amendment, as conditioned, is consistent with the public access policies of the Coastal Act.

D. Recreation

Another of the Coastal Act's goals is to maximize public recreational opportunities in the coastal zone. Recreational boating, bird watching, and walking are the primary recreation opportunities in the Venice Canals area. The Coastal Act has several policies which address the issue of recreation on and near the coast.

Section 30220 of the Coastal Act states:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30221 of the Coastal Act states:

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30224 of the Coastal Act states:

Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.

The dock plan and amendment, as conditioned, is consistent with Sections 30220 and 30221 of the Coastal Act because it provides for water-oriented recreational uses consistent with the Coastal Act. The dock plan and amendment is also consistent with Section 30224 of the Coastal Act because it increases the opportunities for recreational boating in the Venice Canals. Boating use is encouraged by the dock plan and amendment by permitting up to 175 boat docks where there are currently none. The public boat launch also provides for public recreational boating opportunities. Therefore, the dock plan and amendment provide the opportunity for all people to enjoy recreational boating in the Venice Canals.

E. Marine Resources

The Coastal Act contains many policies which serve to protect marine resources and marine habitats. The following Coastal Act policies apply to the proposed project because of its potential impacts to the wetlands and marine environments found in the water and along the banks of the Venice Canals.

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

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

Section 30233(a) of the Coastal Act limits the fillings of coastal waters. It states, in part:

- (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:
 - (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.
 - (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.
 - (3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.
 - (4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the

placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

- (5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.
- (6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.
- (7) Restoration purposes.
- (8) Nature study, aquaculture, or similar resource dependent activities.

In addition, Section 30233(c) states, in part:

- (c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary.....

Section 30240 of the Coastal Act states:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

The Venice Canals are part of the larger Venice Canals/Ballona Lagoon wetlands system. Seawater enters the wetlands system through tidal gates which the County controls to allow water to flow to and from the Marina del Rey entrance channel and Ballona Lagoon. Seawater flows through Ballona Lagoon to another set of tidal gates located in Grand Canal at Washington Boulevard. The City operates the Grand Canal tidal gates which separate Ballona Lagoon from the Venice Canals located north of Washington Boulevard (Exhibit #1).

The Venice Canals are protected under the Coastal Act policies stated above. The entire canals system is an Environmentally Sensitive Habitat Area (ESHA) as defined in the Coastal Act. In addition to being important wetlands, the canals system is a critical habitat area for the endangered California least tern, Sterna antillarum browni, and many other marine species.

Section 30233 of the Coastal Act limits the types of development allowed in wetlands. The construction of boat docks involves filling of wetlands in the form of pilings. Each boat dock is supported by two 6-inch diameter piles (Exhibit #2). Each dock pile is supported by a small

concrete footing placed in the gravel toe of the canal bank. There will be no filling in addition to the piles and footings, which are placed above the low water line.

Section 30233(a)(2) of the Coastal Act allows for the maintenance of existing boating facilities in existing channels. Historically, recreational boating has been a popular recreational activity and boat docks have existed in the Venice Canals since the early 1900's. The previously existing boat docks were removed in 1992 when the City dredged the canals as part of the Venice Canals rehabilitation project [Coastal Development Permit 5-91-584 (City of Los Angeles)]. In 1993, the Commission's approval of Coastal Development Permit 5-92-377/A5-VEN-92-377 (City of Los Angeles) for the Venice Canals boat dock plan allowed residents to construct new docks under the process described in Special Condition Three of the coastal development permit (Exhibit #3, p.1). Therefore, boat docks in the Venice Canals are an allowable type of development in coastal waters pursuant to Section 30233(a)(2) of the Coastal Act.

Section 30233(a) of the Coastal Act allows boat docks and other development in coastal waters only if there is no feasible less environmentally damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects. Section 30240 of the Coastal Act requires that development in environmentally sensitive habitat areas, like the Venice Canals, be compatible with the continuance of such habitat areas and be designed to prevent impacts which would significantly degrade such areas.

The design and location parameters approved as part of the Venice Canals boat dock plan were specifically designed by the City and approved by the Commission to limit the impacts of recreational boating in the Venice Canals. First, the plan allows for the construction of small docks on the banks of the canals in order to reduce the trampling of the banks and wetland vegetation. As part of the Venice Canals rehabilitation project, the City has planted and is maintaining approximately one acre of native wetland vegetation along the reconstructed banks of the canals. The approved docks allow people to access boats in the water at the docks, thereby reducing damage to the banks and wetland vegetation by providing distinct access points which eliminate the need to walk through and trample the wetland vegetation.

Secondly, the dock plan reduces impacts to the wetland habitat by limiting the maximum number of potential docks to 175. Other alternatives that were considered would allow no boat docks or would not limit the number of docks. Every alternative, even the no project alternative, would result in some impacts to the canal habitat caused by recreational boating activities. The construction of all 175 approved docks would directly impact 0.18 acres of the wetland vegetation planted along the banks of the canals. The impact to wetland vegetation occurs when a dock shades a canal bank area five feet wide and approximately three feet long from the edge of the public walkway to the gravel toe of the bank. This impact is mitigated, however, by each dock's limited size and the dock's placement the canal bank. The canal banks, which are constructed with cement Loffelstein blocks and gravel, are not entirely composed of wetland vegetation (Exhibit #2). Additionally, the canal banks and all permitted docks in their entirety are located above the low water line so that no subtidal habitat is displaced.

Finally, the small size of the permitted docks further reduces the adverse environmental effects of the docks. The small size of each dock (5'x 5'8" maximum) provides enough area for a person to access a boat from the banks of a canal, but also limits the amount of area in the canals that is occupied by docks. Each dock is supported by the canal bank (Loffelstein blocks) and two six-inch diameter piles placed on the gravel toe of the canal bank (Exhibit #2). At low tide, the entire dock structure (including the support piles) is above the water line, thus limiting the dock's impacts on marine resources and maintaining a wide channel for recreational boating.

Therefore, the Commission finds that the dock plan and the amendment, as conditioned, prevent impacts and minimize adverse environmental effects which would significantly degrade the environmentally sensitive habitat area, and there is no feasible less environmentally damaging alternative. Furthermore, recreational boating and boat docks in the Venice Canals are compatible with the continuance of the environmentally sensitive habitat area. The dock plan and the amendment are consistent with the Marine Resource policies of the Coastal Act.

F. Local Coastal Program

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal development 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:

- (a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200). A denial of a Coastal Development Permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.

The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The Los Angeles City Council adopted a proposed Land Use Plan (LUP) for Venice on October 29, 1999. On November 29, 1999, the City submitted the draft Venice LUP for Commission certification. On November 14, 2000, the Commission approved the City of Los Angeles Land Use Plan (LUP) for Venice with suggested modifications. On March 28, 2001, the Los Angeles City Council accepted the Commission's suggested modifications and adopted the Venice LUP as it was approved by the Commission on November 14, 2000.

In regards to recreational boating and docks in the Venice Canals, the LUP for Venice contains the following relevant policies:

Policy III. D. 2. Boating Use of Canals and Lagoon. *Recreational boating use of the Venice Canals shall be limited to non-commercial shallow-bottom, non-motorized boats such as canoes and rafts, in order to permit recreation while protecting the environmentally sensitive habitat area and maintain a quiet ambience within the neighborhoods of the plan area. No boating shall be permitted in Ballona Lagoon and the portion of Grand Canal south of Washington Boulevard.*

A public boat launch facility was built as part of the Venice Canals Rehabilitation Project at the Grand Canal and North Venice Boulevard. The City shall protect the public's ability to access the canals by boat by maintaining public access to the Grand Canal public boat launch. The facility shall provide adequate on-site public parking consistent with the sizes and types of boats to be launched and frequency of launching pursuant to the County Department of Small Craft Harbors standards.

Policy III. D. 3. Venice Canals Boat Docks. *Construction of small non-commercial private boat docks along the restored canal banks may be permitted, subject to the approval of the Department of Public Works and a coastal development permit, to provide boating access while protecting habitat along the banks.*

The dock plan and amendment, as conditioned, conform to the Venice LUP policies regarding the Venice Canals. The LUP states that private boat docks are allowed, subject to approval. The LUP also contains a policy to restore and preserve the historic integrity of the Venice Canals. The proposed project is consistent with the preservation and the historic nature of the area. The amendment also conforms to the recreational policies of the LUP which state that non-motorized boats shall be permitted in the Venice Canals, but prohibited in Ballona Lagoon and Grand Canal south of Washington Boulevard. The public boat launch ramp in Grand Canal is also recognized by the LUP.

Therefore, the dock plan and amendment, as conditioned, conforms with the Commission-approved Venice LUP. The dock plan and amendment, as conditioned, is also consistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City's ability to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

G. California Environmental Quality Act (CEQA)

Section 13096 Title 14 of the California Code of Regulations requires Commission approval of a coastal development permit application 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 dock plan and amendment, as conditioned, has been found consistent with the Chapter 3 policies of the Coastal Act. All adverse impacts have been minimized by the recommended conditions of approval and there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.

H. Enforcement

Some of the docks that have been built recently in the City rights-of-way of Linnie, Howland, Sherman, Eastern, Grand (north of Washington Blvd.), and Carroll Canals have not complied with the dock approval process described in Special Condition Three of Coastal Development Permit 5-92-377/A5-VEN-92-377 (Exhibit #3, p.1). During the first term of the Commission approved project (1993 until December 31, 2000), Commission records indicate that nineteen docks were authorized pursuant to the terms of Coastal Development Permit 5-92-377/A5-VEN-92-377 (City of Los Angeles). The City surveyed the canals in 2001 and found a total of eighty docks in the Venice Canals. That means that at least 61 of the eighty existing docks are non-permitted docks (Exhibit #3, p.8). A non-permitted dock is one that is not authorized pursuant to the process described in Special Condition Three of Coastal Development Permit 5-92-377/A5-VEN-92-377 (Exhibit #3, p.1).

The City proposes to eliminate the non-permitted docks by processing after-the-fact approvals for the development. Another option is for the City to remove the non-permitted docks from the City right-of-way. In order to process after-the-fact approvals for the non-permitted docks, and to allow construction of new docks, the City has requested this amendment to amend Special Condition Six of Coastal Development Permit 5-92-377 in order to extend the time period during which private residential boat docks can be permitted in the Venice Canals. The former time period established by Special Condition Six of Coastal Development Permit 5-92-377 expired on December 31, 2000. Currently, no authorization for existing or proposed docks can be granted under the terms of Coastal Development Permit 5-92-377 until Special Condition Six is amended.

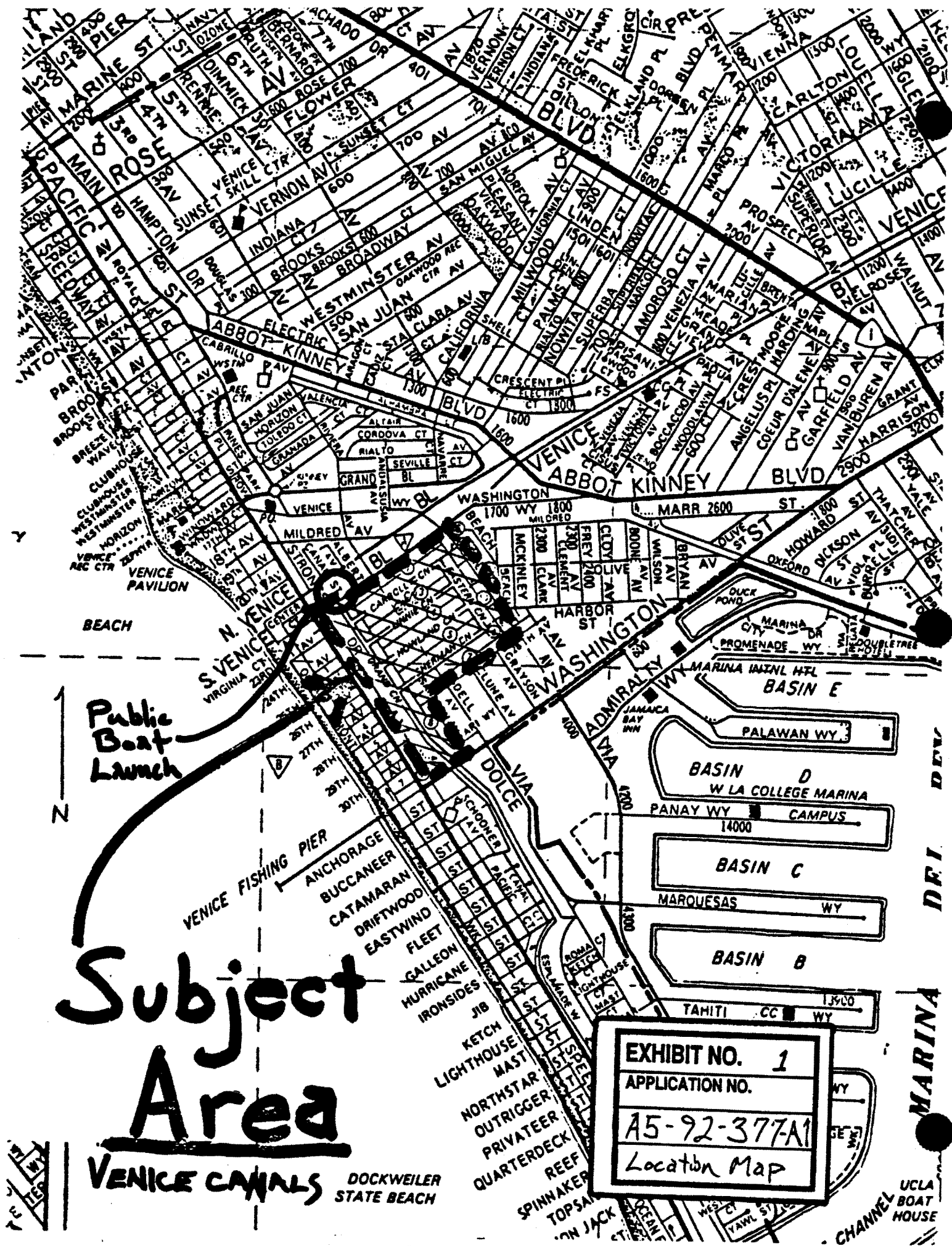
In order to grant the City the opportunity to correct the situation with non-permitted docks in the Venice Canals, Special Condition Six of Coastal Development Permit 5-92-377 is amended in order to establish a time period during which existing and proposed docks can be authorized under the process described in Special Condition Three of Coastal Development Permit 5-92-377/A5-VEN-92-377 (Exhibit #3, p.1). The new term would commence upon the City's submittal of an operating plan for the Grand Canal public boat launch required by revised Special Condition Four, and would end on December 31, 2002. Prior to applying for a subsequent term, the City is required to submit a monitoring plan to the Commission which documents the results of the City's efforts to eliminate and prevent the construction of non-permitted docks.

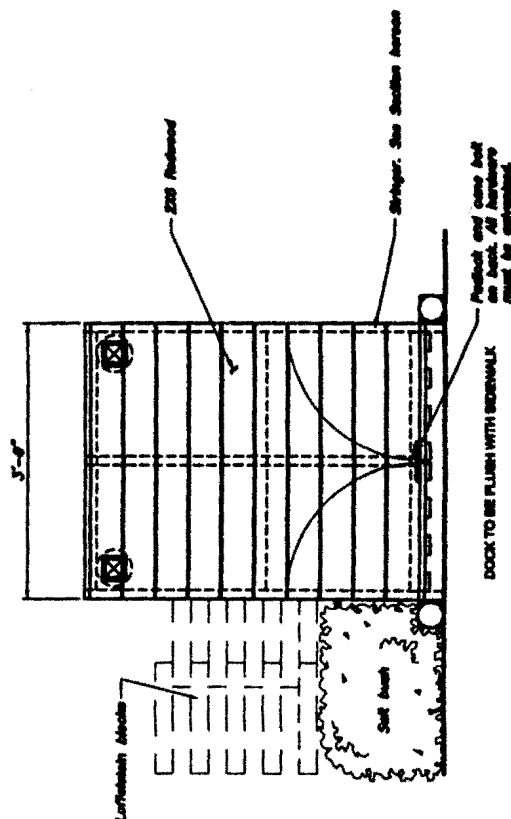
Revised Special Condition Six states:

The time period during which private residential boat docks may be permitted to be constructed in the Venice Canals pursuant to Coastal Development Permit A5-92-377 and Amendment 5-92-377-A1 shall expire on December 31, 2002. Prior to December 31, 2002, the City shall submit a monitoring report to the Executive Director which documents the location and number of permitted and unpermitted dock structures in the Venice Canals. The monitoring report shall include an analysis of the City's current and past efforts to eliminate and prevent unpermitted dock structures in the canals. Upon submittal of the monitoring report to the Executive Director, the City may apply to the Commission for a permit amendment in order to extend the time period during which private residential boat docks may be permitted to be constructed in the Venice Canals.

Although development has taken place prior to submission of this permit amendment, consideration of this application has been based solely upon the Chapter 3 policies of the Coastal Act. Approval of this permit amendment does not constitute a waiver of any legal action with regard to any alleged violation of the Coastal Act, nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal development permit.

End/cp





1. The Contractor shall verify all dimensions to the steel before ordering or fabricating material.
2. All existing joistings that need to be removed shall be replaced in equivalent joistings or as directed by the City Engineer.
3. Concrete shall be Class 600-C-5000, 4" maximum slump.
4. All bar reinforcement shall conform to the requirements of ASTM Reinforcement A615 Grade 60.
5. Bar spacings are similar to existing. Bar cover is three eights of bar to face of concrete.
6. All metal joistings and fastenings shall be hot dipped galvanized whenever fastenings shall be not called for on the plans.
7. Joistings shall comply with and members shall conform to ASTM F695-95, Type 316L.
8. Joistings shall comply with and members to ASTM A509-04, Type 316L.
9. Cover of slabs shall comply.



ELEVATION
SCALE 1"=14'

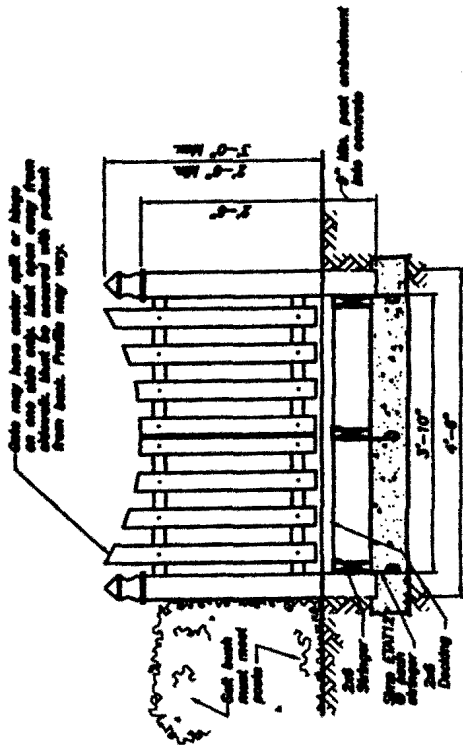
EXHIBIT # 2
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PRELIMINARY
FOR DESIGN

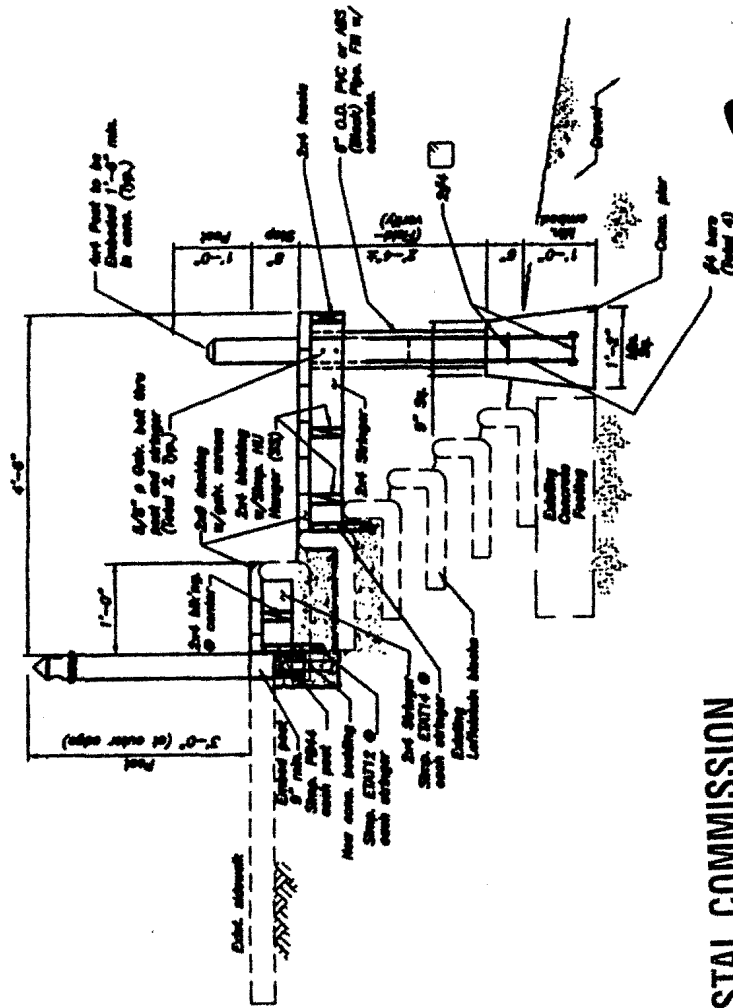
APR 26 1999

STRUCTURAL
ENGINEERING DIVISION

- General Notes**
- The Contractor shall verify all dimensions in the field before ordering or fabricating materials.
 - All existing shoring that need to be removed shall be replaced in equivalent location or as directed by the City Engineer.
 - Concrete shall be Class 5000-0-3000, 4" maximum slump.
 - All bar reinforcement shall conform to the requirements of ASTM Specification A615 Grade 40.
 - Bar spacings are center to center. Bar cover is from edge of bar to face of concrete.
 - All metal hardware and fasteners shall be hot dipped galvanized in accordance with the requirements of the City Engineer.
 - Shoring shall be built, made and erected shall conform to ASTM F1063-95, Type 31FL.
 - Shoring shall be built shall conform to ASTM A486-94, Type 31FL.
 - Grade all shoring edges smoothly.
 - Trimmer shall be Center of cut-beam Reduced No. 1 or better. Trimmer must be tested and sealed.



VIEW FROM SIDEWALK
ELEVATION
SCALE 1"=1'-0"

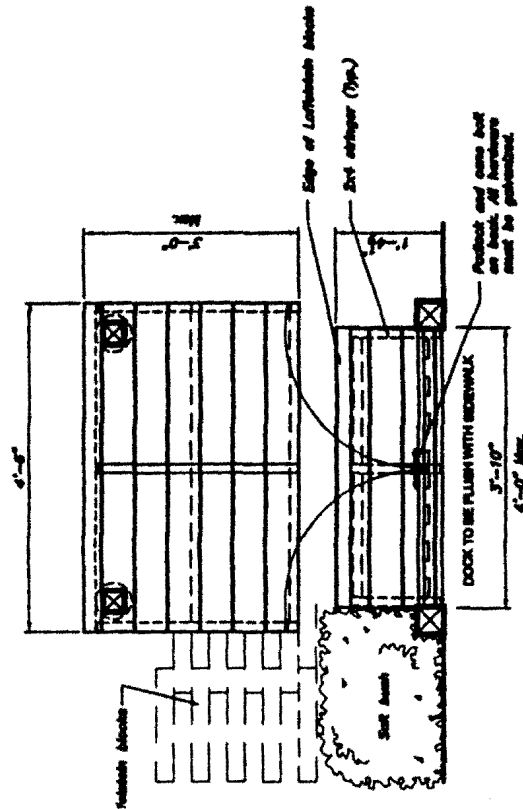


COASTAL COMMISSION

SECTION
SCALE 1"=1'-0"

EXHIBIT # 2

PAGE 3 OF 3



PLAN
SCALE 1"=1'-0"

City of Los Angeles

ADDITIONAL INFORMATION AND/OR MATERIALS NECESSARY TO COMPLETE COASTAL DEVELOPMENT PERMIT AMENDMENT APPLICATION 5-92-377-A1 (VENICE CANALS DOCKS)

1. Please describe all terms and conditions that the City will require individual dock builders to meet prior to obtaining City permission to construct docks in the Venice Canals. Include amount and type of required insurance, fees, plans, residency requirements, etc.

The applicant submits the following to the West Los Angeles District Office of the Bureau of Engineering (WLA), located at 1828 Sawtelle Boulevard:

1. Identification to verify that the applicant is the owner of the abutting property (or provide a notarized letter from the property owner authorizing the applicant as agent for the owner)
2. Evidence of Legal Interest in Property (i.e. a title report or tax bill)
3. A sketch showing the proposed location of the dock with dimensions from the lot lines
4. A check for \$502.90 (Tier 1 Revocable Permit Fee) made out to "City of Los Angeles"

WLA will give the Applicant:

1. A receipt for paying \$502.90
2. Dock reference number
3. Permit Package (see Exhibit 1).

The Permit Package contains 9 items:

1. Instruction to Applicants
2. City request letter for Assignment of Coastal Permit
3. Coastal Commission application and Affidavit for Assignment of Coastal Permit
4. Coastal Commission Notice of Intent to issue permit
5. Standard Plan for dock
6. Key Map
7. Waiver of Damages forms and instructions
8. Liability Insurance Package
9. List of Revocable Permit Conditions for boat docks

Evidence of Legal interest in Property and Items 2-6 must be hand carried or mailed

~~with a check for \$200.00~~ to the Coastal Commission Office located at ~~245 West~~

~~Broadway, Suite 200~~, P.O. Box 1450, Long Beach, CA 90802-4416. *No Fee.*

200 Ocean Gate 4/1000

Applicant records the Waiver of Damages at the County Recorder's Office.

The applicant or contractor returns to WLA with:

1. Coastal Commission approval

COASTAL COMMISSION
5-92-377-A1

EXHIBIT # 3

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2. Recorded Waiver of Damages
3. Liability insurance slip from the Board of Public Works office with City Attorney's approval number
4. A check for \$1,031.00 (\$31 for the E-permit and \$1,000 for the Work Order deposit)
5. Contractors name and license number

WLA will give the Applicant or Contractor:

1. E-Permit for construction
2. Instructions and requirements for construction inspection

Licensed Contractor constructs dock and follows the inspection instructions

After the final inspection and closing of the W.O. (which includes settlement of any deficit or refund), WLA will issue and mail the Revocable Permit to the applicant

2. **Please submit results of local public hearing(s) regarding the proposed extension of coastal development permit term for the City of Los Angeles Venice Canals Boat Dock Plan, including copies of written public comments received and minutes of December 14, 2000 public hearing.**

A copy of the Hearing Attendees sign-in sheet is attached as ~~Exhibit 2~~.
Written comments attached as ~~Exhibits 3 through 8~~.

The public had the following project concerns:

- a.) Sharing of boat docks by adjacent neighbors
- b.) Existence of Public Boat Launch
- c.) Dissatisfaction with the original dock design due to size and cost of permits and construction.

The Venice Canals Association "endorses and supports" the City of Los Angeles' request for a 2-year extension of the Local Coastal Development Permit (~~see Exhibit 3~~).

3. **Please submit an analysis of the cumulative impacts associated with the construction of boat docks in the Venice Canals and the use of the canals for public recreational boating activities. Include an inventory of all permitted and unpermitted dock structures that currently exist in the Venice Canals.**

Operation and Maintenance

The Venice Canals Maintenance Program (W.O. E6000440) maintains the Venice Canals, the Grand Canals and the Ballona Lagoon. The purpose of the Venice Canals maintenance work is to keep the rehabilitated canals clean, control algae growth, maintain the landscaping and operate the tidegates.

COASTAL COMMISSION

The Venice Canals (Sherman, Howland, Linnie, Carroll, Grand (from Washington Street to North Venice Boulevard) and Eastern Canals) were originally constructed in 1905 and were designated as public right-of-ways owned by the City of Los Angeles, open to the public for use of small, non-powered boats for recreation and intra-canal travel. The canal right-of-ways were withdrawn from public use in 1942 due to the severely deteriorated condition of the canal embankments and adjacent sidewalks. The canals were rehabilitated in 1992 and 1993.

The canals, approximately 1.5 miles long, were embanked with special blocks called Loffelstein. New sidewalks were also constructed in addition to a brand new 1.5-foot wide landscaping strip with native material and plants approved by the California Coastal Commission.

The water in the canals comes from the ocean (through a gate at Via Marina, controlled by the Los Angeles County's Department of Beaches and Harbors) via the Ballona Lagoon through five tidegates located at Washington Street and the Grand Canal. The control box adjacent to the tidegates contains the electrical switches used to open and close the tidegates. Flushing (emptying at low tides and re-filling at high tides) depends on the tide level. The canals must be kept full of water (whenever the tides permit) on weekends, holidays and at the City's request for special events.

The City of Los Angeles has been granted an easement for the flow of water from Ballona Lagoon to the canals. Ballona Lagoon and Grand Canal are used to store floodwaters during major winter storms, and the operation of the gates is designed to prevent flooding to low-lying structures in this area.

The maintenance program contributes to improved water quality, however, the canal waters are subject to pollutant inputs via urban runoff and nuisance runoff from adjacent properties.

The current boat dock plan allows one boat dock to be constructed anywhere within the segment of canal which corresponds to a property owner's lot lines. However, if any dock is proposed within six feet of an adjacent lot's frontage, the dock builder must receive written consent from the adjacent property owner. Two adjacent property owners may build a shared dock, but in order to do so, they must forego their privilege to build individual docks.

The City's proposed plan also established size standards for non-motorized boats in the Venice Canals. Motorized boats are prohibited. The proposed size standards are identical to those first proposed in the master plan. The following are the City's proposed size standards for boats:

Maximum length:	18.0 feet
Maximum width:	6.0 feet
Maximum length plus width:	21.0 feet
Maximum draft:	2.0 feet

COASTAL COMMISSION

EXHIBIT # 3
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Maximum height: 3.5 feet above water line
Maximum draft plus height: 4.0 feet above water line

The City's plan also has the following design parameters for boat docks:

Overall dock width: 5'0"
Overall dock length: 5'8"
Foundation of reinforced concrete
Foundation footprint no larger than standardized plan specifications
No fixed roofs or canopies
Required safety barrier on all four sides
Required self-latching gate:
Minimum height: 2.5 feet
Maximum height: 3.5 feet
Maximum width: 5.0 feet

This plan requires utilization of specified construction methods which are designed to minimize the potential for adverse environmental impacts associated with the construction of the boat docks in the canals.

Coastal Act

The project is located in the Venice Canals which are in part submerged lands subject to tidal action. Therefore, the proposed project is also located between the sea and the first public road paralleling the sea and within three hundred feet of the mean high tide line. Consequently, the Venice Canals are located in the dual permit jurisdiction area as defined in Section 30601 of the Coastal Act.

Under Section 30600(b) of the Coastal Act, a Coastal Development Permit for the portion of the project that involves construction in the water of the Venice Canals must be approved by the Coastal Commission rather than the City. However, the City of Los Angeles does have the authority, as the local government and landowner of the Venice Canals, to approve the project and revocable permit applications regardless of Coastal Act requirements.

Public Access

Public access to and through the Venice Canals has not been impacted by the project. The plan has not restricted the public from using the Venice Canals for recreational boating. The public can access the canals with non-motorized boats at the public boat launching ramp approved under Coastal Permit 5-91-584 (City of Los Angeles). The public boat-launching ramp is located on the northern end of the Grand Canal.

Section 30210 of the Coastal Act states that maximum access and recreational opportunities shall be provided for all the people. In order to ensure that the public would not be excluded from boating in the Venice Canals, and that the public was

given an equal opportunity to access the Venice Canals for recreational boating, the approval of the plan was conditioned so that no private residential boat docks were permitted or built until the public boat launching ramp and parking lot at the northern end of Grand Canal was open and available for use by the general public.

Public access along the public walkways adjacent to the Venice Canals must also be protected. The construction of the private residential boat docks does not affect the use of the public walkways along the sides of the Venice Canals. In order to ensure that the future construction and use of the docks does not inhibit the use of the public walkways, the plan is conditioned to prohibit the storage of boats or other items within the public walkways.

Because the plan will not reduce public access to, along, or through Venice Canals, and the public has an equal opportunity to access the canals for recreational boating at the public boat launching ramp, the plan is consistent with the public access policies of the Coastal Act.

Recreation

The plan is consistent with Section 30224 of the Coastal Act because it increases the opportunities for recreational boating in the Venice Canals. Boating use is encouraged through the City's plan by providing up to 175 boat docks. The plan, along with the public boat launching ramp, provides all people with an opportunity to enjoy recreational boating in the Venice Canals.

The storage of boats had been a concern of some Venice Canal residents. They are concerned that stored boats will block the canals or public walkways. Under the City's plan, boat storage will not inhibit recreational boating in the canals. There is ample room to tie two boats to each dock without obstructing the canal. Boats may also be stored in the boat-owners' front yards. No boats or equipment may be stored on the public walkways along the canals.

Marine Resources

The Coastal Act contains many policies which serve to protect marine resources and marine habitats. The following Coastal Act policies apply to the project because of its potential impacts on the wetlands and marine environments found in the Venice Canals and their banks.

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will

COASTAL COMMISSION

maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

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

Section 30233 of the Coastal Act states, in part:

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(3) In wetland areas, only entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.

Section 30240 of the Coastal Act states:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

The Venice Canals are part of the larger Venice Canals/Ballona Lagoon wetlands system. Sea water enters the wetlands system through tidal gates which control the flow from the Marina del Rey entrance channel into Ballona Lagoon. The sea

water then flows through Ballona Lagoon to another set of tidal gates located at Washington Boulevard, which separate Ballona Lagoon from Grand Canal and the rest of the Venice Canals.

The Venice Canals are wetlands and are protected under Coastal Act policies. The entire canal system is an Environmentally Sensitive Habitat Area (ESHA) as defined in the Coastal Act. In addition to being important wetlands, the canal system is used by the endangered California least tern, Sterna antillarum browni.

Section 30233 of the Coastal Act limits the types of development allowed in wetlands. Under Section 30233(a)(3) of the Coastal Act, boating facilities are an allowable use in the canals. Recreational boating has historically occurred in the Venice Canals.

Implementation of the plan results in some wetland habitat loss on the banks of the canals where the 175 docks are proposed. In addition, the shade created by the proposed docks will impact habitat value. However, some impacts associated with the construction of docks may be beneficial to the environment. The pier pilings and shade will promote the development of a more diverse type of habitat recognized as a valuable aquatic environment. The docks will protect the canal habitat by directing human access away from the vegetated banks of the canals by providing alternative access to the water through the docks.

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:

- (a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200). A denial of a Coastal Development Permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.

On November 14, 2000, the Coastal Commission approved the Venice Coastal Land Use Plan (LUP), with modifications. These modifications must be made by

ON

May 14, 2001, in order for the Coastal Commission to certify the LUP. The project conforms to the Venice LUP policies regarding the Venice Canals.

CEQA

Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit application to be supported by a finding showing the application, as conditioned by conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternative or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

The City analyzed several alternatives and determined that the current plan is the least environmentally damaging because it reduces the number of docks in the canals, and thus the impacts of the docks on the canal habitat. In addition, an EIR with addendum and supplements was prepared by the City for the Venice Canals rehabilitation project. The EIR documents discuss the affects of both non-motorized and motorized boats in the canals. The EIR documents conclude that the use of non-motorized boats in the canals would not cause any major impacts.

STATUS OF PERMIT APPLICATIONS

As of February 12, 2001, there are 75 Non-permitted boat docks and 5 permitted boat docks in the Venice Canals (see below):

Non-permitted Boat Docks

301 Washington on Grand Canal
2210 Grand Canal
2212 Grand Canal
2219 Grand Canal
2310 Grand Canal
2320 Grand Canal
2333 Grand Canal
2405 Grand Canal
2408 Grand Canal
2508 Grand Canal
2604 Grand Canal
2605 Grand Canal
2610 Grand Canal
2614 Grand Canal
2620 Grand Canal
2904 Grand Canal
2910 Grand Canal

Permitted Boat Docks

450 Carroll Canal SA4
457 Linnie Canal SA23
2427 Eastern Canal SA16
446 Carroll Canal SA15
458 Carroll Canal SA17

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3001 Strongs Drive
 2302 Strongs Drive
 2316 Strongs Drive
 2318 Strongs Drive
 2500 Strongs Drive
 2700 Strongs Drive
 2820 Strongs Drive
 213 Linnie Canal
 230 Linnie Canal
 232 Linnie Canal
 236 Linnie Canal
 415 Linnie Canal
 428 Linnie Canal
 437 Linnie Canal
 453 Linnie Canal SRA
 499 Linnie Canal
 230 Carroll Canal S11
 236 Carroll Canal
 240 Carroll Canal
 241 Carroll Canal
 401 Carroll Canal
 405 Carroll Canal
 416 Carroll Canal
 425 Carroll Canal
 433 Carroll Canal
 447 Carroll Canal
 451 Carroll Canal
 453 Carroll Canal
 457 Carroll Canal
 2302 Dell on Carroll Canal
 211 Sherman Canal
 213 Sherman Canal
 217 Sherman Canal
 218 Sherman Canal
 220 Sherman Canal
 229 Sherman Canal
 408 Sherman Canal
 452 Sherman Canal SRA
 217 Howland Canal
 223 Howland Canal
 413 Howland Canal SAG
 415 Howland Canal
 420 Howland Canal SAG
 424 Howland Canal
 428 Howland Canal
 431 Howland Canal SAG

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437 Howland Canal
452 Howland Canal
445 Howland Canal
453 Howland Canal
456 Howland Canal
460 Howland Canal
2335 Eastern Canal
2337 Eastern Canal
2401 Eastern Canal
2427 Eastern Canal SA 16
2429 Eastern Canal

3. Please submit the City's plan to eliminate all non-permitted docks and other structures from the Venice Canals. Include in the plan a City enforcement plan to prevent additional non-permitted development in the Venice Canals.

The non-permitted boat docks are cited (~~see Exhibit 9~~). Owners must apply for a Revocable Permit to keep a boat dock on private property. An administrative hearing is scheduled at the WLA Office if the owner does not opt to pursue a boat dock permit. If the case is not resolved at the administrative hearing, the owner can appeal and have the case transferred to the City Attorney's Office.

4. Please submit the City's management plan for the Grand Canal public boat launch including: a) the terms for public use and access to the boat launch, b) its past and current level of use, and c) the hours and days of operation of the facility. Include any current or proposed use fees or admission fees.

The Venice Canals Maintenance Program (W.O. E6000440) maintains the Venice Canals, the Grand Canals and the Ballona Lagoon. A contractor, Mariposa Horticultural Enterprises, has been awarded this work. The program comprises algae cleanup, trimming of shrubs and miscellaneous landscaping work, filling up and flushing of canals by means of a mechanical sluice gates gallery (~~see Exhibit 10~~).

The public boat launch is primarily used by the maintenance crews. No formal operation plan is in effect at this time.

COASTAL COMMISSION

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Jerome P. Helman, M.D.
452 Sherman Canal
Venice, CA 90291

December 5, 2000

City of Los Angeles, Bureau of Engineering
Environmental Group
650 South Spring Street
Los Angeles, California 90014

RE: Venice Canal Boat Docks

Dear Ms. Irene Paul,

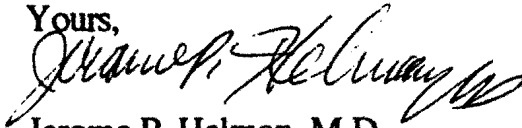
While I cannot attend the meeting on December 14, 2000, there are several points I wish to comment on. First, the letter from the city seemed to indicate that neighbors adjacent to boat docks have the right to use the docks whether they participated in their construction or not. This needs to be clarified. It seems to say that if one neighbor has a dock and another wants to use it, the second neighbor has that right. It is as if my neighbor has something in his yard and I want to use it, so I have the right to enter his yard and use it. This appears to be highly inappropriate.

Next, the yearly inspections. Houses and other buildings are not inspected yearly after their initial inspection or remodeling. Why will docks be inspected yearly? This appears to be a "make work" project. These are small docks for small boats. The docks are to be gated and locked, so pedestrians are not in danger. Why should homeowners pay for a yearly inspection? If inspections are needed, the inspector should be paid by the city, the inspectors' employer.

A "public boat launch" is mentioned in the letter. I have lived on the canals a little less than two years and have not seen a public boat launch. Is this being planned in the future? Is it a concept left from the past? Please clarify this point.

To summarize my concerns. I am opposed to mandatory shared rights for boat docks on the canal, if that is the proposal. I am also opposed to yearly inspections of the docks as it serves no public purpose.

Yours,


Jerome P. Helman, M.D.

COASTAL COMMISSION

5-92-377-A1

EXHIBIT # 4

PAGE 1 OF 1

Public Hearing
Venice-Abbott Kinney Memorial Library
Thursday, December 14, 2000

Conducted by:
City of Los Angeles
Bureau of Engineering
Structural Engineering Group

Project Title: Venice Canals Rehabilitation (W.O. EXX51316)
Venice Canals Boat Dock Plan

Good afternoon. My name is Darryl DuFay. I am a member of the Venice Canals Association's Board of Directors. Our Association has served the Canals for over twenty five years and presently represents seventy percent of the property owners. In addition, we offer participation to non property owners through our " Friends of the Canals" subscription.

The Venice Canals Association endorses and supports the City of Los Angeles' request for a 2-year extension of the Local Coastal Development Permit issued by the California Coastal Commission on Thursday, October 14, 1993 (A5-92-377). The original permit was issued for seven years and expires on December 31, 2000.

The permit "...allows for canal residents to construct their own dock in front of each of their respective lots. The specific locations are not identified. A total of 175 docks would be permitted by the City on a first-come, first-serve basis to the residents who apply for City permits."

However, there has been continual dissatisfaction with the original dock design of the City of Los Angeles. Since the permit was issued in 1993, approximately eighteen individuals sought permits to build docks. However, in that time only five docks were built using the City's dock design. The major objections raised by the property owners were the negative environmental impact of the original design due to its inappropriate size and the high cost of permits and construction. In addition, there has been confusion over liability issues related to building a dock.

In 1998, members of the community undertook to address the concerns about the original dock design. Working with the Bureau of Engineering over the past two years, three new docks designs were developed and approved. I have attached a copy of those designs.

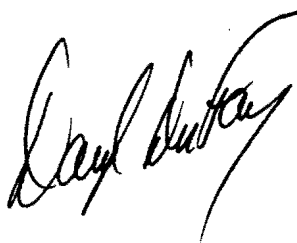
The new dock designs are superior to the original design. They are significantly more environmentally sensitive to the wetlands status of the Canals due to their smaller and less intrusive size. In addition, they are visually less obtrusive. They offer different design choices and can be built at a cost that is less than one third of the original dock design.

We request that the new dock designs be the standard for all new docks constructed in the Venice Canals. We also request that any areas of confusion over the dock applicants' responsibilities and liabilities be clarified immediately.

Thank you for this opportunity to speak today. We look forward to the approval of the City of Los Angeles request to extend the Local Coastal Permit for the Venice Canals Boat Docks.

Darryl DuFay, Member, Board of Directors.
Venice Canals Association
2602 Grand Canal
Venice, CA 90291-4549
(310) 822-9194

Attachment



COASTAL COMMISSION
5-92-377-A1
EXHIBIT # 5
PAGE 1 OF 1

California Coastal Commission
200 Ocean Gate 10th floor
Long Beach
California

RECEIVED
South Coast Region

MAR 12 2001

Maryjane
PO Box 5844
Santa Monica
Calif. 90405

1st March 2001

CALIFORNIA
COASTAL COMMISSION

Dear Chuck Posner, Pam Emerson, and Commissioners:

This letter is in regards to the sotermed Venice Canals Boat Dock Master Plan and Revocable Permit, and issues concerning such. Please note copies attached, on this issue. Copies of such weere submitted to Jim Doty, who held a small meeting at our Venice Library, 14 Dec. 2000. The "posted notices" on this issue, put up late on 21 Nov. told to contact you...no mention of the City of LA. Doty audio taped the meeting: you may wish to listen to those tapes.

Reminders... The Venice Canals, north and south of Washington Street, are of the **PUBLIC WETLANDS WATERWAYS**. They are supposed to be protected under such environs. But you have allowed full **MOTORS** used daily, since the "restoration" of the northern canals by 1995: the motor boat and chain saws and other such are polluting daily, destroying environs/habitats. **AND...there can be NO PRIVATE DOCKS** in the Canals/Wetlands/Waterways. It is a **PUBLIC** system/environs. You have **HUGE PERMANENT** structures in the canals now. They need to be removed. (Of course you have allowed the **FORTRESSES** all about, and even the "TRADE OFF" of **PUBLIC LANDS** here, to private profiteers, too.)

It seems **FINE** that people do as done from @ 1905-1996, here. Only simple, environs biodegradable, small step docks and really mostly just simple "tie ups" for the **NON-MOTOR** water craft were used (some still remain). Materials were of simple wood, small post, stick, a stone, a piece of plant. **PLEASE** have this be the way to continue, both north and south of Washington Street!!!

Yes, you do need to reset the wetlands plants of the embankments of the low canal wetlands. The huge **BLUFF** plants you have all about the northern canals (and even near Washington Street, now) are wrong: non-native, non-indigenous, invasive, and intently forced to oust all other/proper vegetations, chain saw massacres go on daily for such: horrid and destructive on all levels and aspects. Varities of other plants might be used.

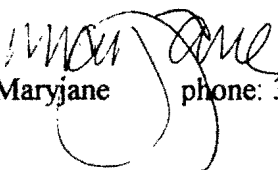
The issues of the issue need to be addressed and lived with as a "whole," not piecemeal polluting profiteering. These aspects matter whether I am dead or alive. I own nothing. I have no "conflict with interest." My letters to gov. bodies go to trash...as such to you in 1997 and 1998. This one is sent again, in hopes of bettering all about as we all go along. "Issues" include the ones noted on the attached "comment" copies. It is now known that boat/watercraft "must" be "registered, or so the powers that be wish. NOT necessary!!! Soon we will all wear badges...privatize the public wetlands...you know the way.

COASTAL COMMISSION
5-92-377-A

EXHIBIT # 6
PAGE 1 OF 3

Though I deal with many realities, and constant life-death issues of beloveds, so that my schedules are often packed, and I am called out of town...if you WOULD LIKE A TOUR of the issues, in brief, I would be glad to arrange such. I raised my children here, doing constant community and cultural works. I co-did the efforts, also, of getting the Venice Canals declared Cultural and Historical Monument Status (not that the status has been really protected or enforced), in my @ 35 years, here

Sincerely,


Maryjane phone: 310-306-9536...please leave best times & ph# to return any calls.

PS. It is known that there is NO CLARITY as to who is responsible for any one falling in the canals. Long stretches still remain of no barrier/bluff plants... people rarely ever fell in the canals...do you have reports of such from your 1972 inception? Can it be that no one else is responsible other than the faller inner? Of course there is such an army of dogowners/dogs not controlled, most not leashed, owners with café and cell phones that cause day and night trials...perhaps THAT needs to be addressed. As it is of recent, dogowners.dogs have all rights at any speed any where in Venice , and all about the canals and beaches.

COASTAL COMMISSION

EXHIBIT # 6
PAGE 2 OF 3

PRIVATIZATION by the PROFITEERS
Is the high crime rate of officialdoms.

The public territories are public.
Virtues seem beneficial.
Neither Master nor Slave
Seems the best "Plan."

See reminders/comments below, as done for
A half century, here. You have a chance to
Fulfill your responsibilities, to resolve
Many past harms here, and answer
For your actions within the human realm.

As The CANALS FLOW
There are three major tides:
Environmental, Cultural, and Historical.
We do not favor any of the recent past assessments and harms done, nor such for any
Los Angeles "Master Plans" for Venice, its Captive Daughter since October 1925. We
do not favor the "Venice Canals Boat Docks Master Plan and Revocable Permit," nor
the "Parler-vous French Drain" assessments/demands. The 1911 assessment law
is of Los Angeles, not Venice.

These motor uses ... to stop. These fortress "docks" ... to not be.
The privatization vegetation/fences of fortress forces to be
The bridges might get to be public.
Off all public areas
The personal designer lifestyle colours of the officialdomers
The plants, of canal embankments: the few salt grasses, the few pickle weeds,
The occasional sea lavender, beach lupine, beach evening primrose, poppy, plus a few
others. No fenced or gated canals systems are needed, your BLUFF PLANTS were never
Here till late 1995-early 1996. 1905 to 1996 all was fine with no fences, gates, hedges.

"Freedom is a matter of choice."

2 or 3 pages of enclosures may be attached with this reply...

LOCAL COASTAL DEVELOPMENT PERMIT PUBLIC HEARING

FOR

VENICE CANALS BOAT DOCK MASTER PLAN AND REVOCABLE PERMIT

Thursday, December 14, 2000
1:00 - 4:00 p.m.

If you plan to speak this afternoon or would like to make a written comment, please fill
out the following and hand it to any staff member.

Name: _____

OCCUPANT / CURRENT RESIDENT

Address: _____

Zip Code: _____

90291

Are you representing an organization? _____

Group Name: _____

☐ I WOULD LIKE TO SPEAK

☒ I HAVE THE FOLLOWING COMMENT:

Venice used to have 16 to 18 miles of canals, now it has @ under 4 miles of canals; they
are supposed to be public in full, they are supposed to be "protected wetlands waterways"
They were declared as Cultural and Historical Monuments; nationally and statewide in
1982, then by the City of LA, 15 July 1983. Some constant issues are with them; without
them, there is no "Venice" really.

No motors are allowed to be used in the canals/ embankments/walkways/walk bridges...
Since the illegal ways the northern canals were redone 1992-1995; motors are used daily
in all such areas. Note that canal maintenance never used any such... till the "redone"
powers that be seem to insist that these huge motors pollute and deter all wetlands
wildlife balances; most agree that less than 4% of our original wetlands remain, now.

The city/powers that be have forced embankment plants, that they also tend with high
powered motor tools, along the canals; these are non-native, non-indigenous, and
invasive, and deter the wildlife balance of the remaining wetlands. The plants are seen in
nature, here and there in the bluffs areas, but not below that habitat.

As wetlands waterways... no permanent nor private structure/s nor blocking of walkways,
embankments, or waters, etc., may be made. We now have, since '96, mostly, huge
structures of such things... large & small, cemented, posted, gated, marked off "docks"
and "seats" and blockades. They are illegal on all aspects. People can have some simple
wooden post or boat tieup, small dock, of no permanent mode; none of it is private; the
wetlands are public, and one can use a hand/body/paddle/oar/sail SMALL watercraft and
tie it up appropriately between uses.

All the Dell Ave. side strips by the residences and by the city lots and by the Linnie
Canal Park are public road way... the road was two way traffic till recent powers that be
made it one way... the city pillars by the park; the various lot owners adjacent to such,
and the remaining city lots' encroachment/landscapings/"no parking" signs/ the police
and parking depts of the city giving tickets for parking in such areas: all are not of the
public ways; it is public Dell Ave. roadway. The privatization of such, as of docks, gates,
fences, blockades (inclusive of yard vegetations)... is what it is of powers that be.

The South Grand Canal has @ 8 residences... all with complete privatization and
blockade of any walkpath/sidewalk (across from Driftwood to Galleon) this has been an
issue for @ 33 years... from the powers that be. That embankment has many other issues
up to Washington St., also. The Grand Canal/aka Ballona Lagoon has many other issues,
including the entire western embankments and who owns what with what zoning by
powers that be... as so the issues of the Ocean Front Walk not restored on our peninsula
and the issue of the bike path never allowed there, by the powers that be.

P.343

Looking forward to discussing
a canal access gate
with you.

MOVING IN THE RIGHT DIRECTION

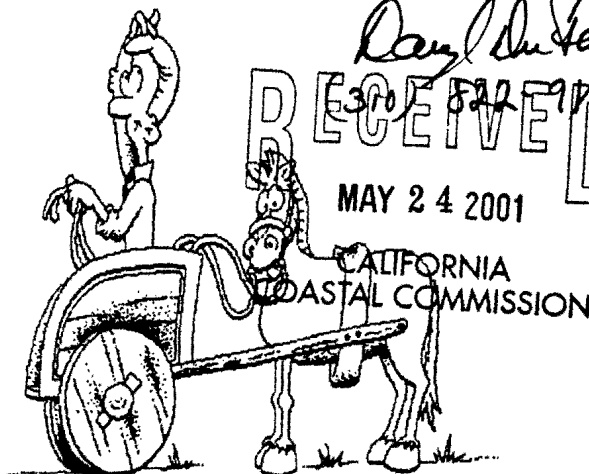
AN UPDATE ON BOAT DOCKS AND BOAT STORAGE IN THE CANALS

FYI

Distributed to
the Community

Ray L. Day

RECEIVED
310 522 9174
MAY 24 2001



The Venice Canals Association has been involved in addressing the concerns of residents regarding the Street Use Inspection Division "Notices" issue for Non-Permitted docks (1-29-01) and boats stored in the canals (4/30 - 5/4).

BOAT DOCK BACKGROUND

In 1993, the CA Coastal Commission approved a Local Coastal Development Permit to build up to 175 docks in the Venice Canals. This permit was required because the Canals are a joint jurisdictional area with the City of Los Angeles. The permit expired on December 31, 2000.

Only five permitted docks were built in seven years. Most people felt that the original dock plan was far too large and costly, and out of scale for our Canals. A dock was reported to cost about seven thousand dollars. For the past three and a half years the Association and community members worked with the City on a dock plan that was smaller and far less expensive. That dock plan was approved by the City.

"NOTICE" FOR NON-PERMITTED DOCKS - 1/29/01

In December, 2000, the City applied to the CA Coastal Commission for a two year extension of the expiring dock permit. The City felt confident that they would have the permit in February.

Based upon the expectation of having a permit and the safety concern for the docks that had no gate or barricade, "Notices to Abate Nuisance or Correct Violation" were issued in late January to the property owners of the seventy four docks that had been built without a permit. The owners of these non-permitted docks were notified to apply "....for a Revocable Permit to keep a Boat Dock on Public Property." The notice also instructed the dock owner to "Barricade boat dock entrance immediately so that it will restrict small children and pets from entering the dock area."

A "Revocable Permit" is necessary to build a dock because the canals are a public right of way. Unfortunately, the City did not get the permit authority by February. The Association requested that no further action be taken on the "Notices" under the City's permitting authority was resolved.

STATUS OF DOCK "NOTICE"

At the present time the City CANNOT issue a permit for a dock. The dock "Notices" are temporarily on hold until the City receives permitting authority. The CA Coastal Commission has scheduled a June meeting (tentatively) to vote on the City's application to issue dock permits.

COASTAL COMMISSION
5-92-377-A1

EXHIBIT # 7
PAGE 1 OF 3

REMINDER: The "Notice" created a "paper trail" for owners of docks who have NOT yet barricaded their dock entrance. You are strongly encouraged to immediately build a barricade or remove your dock to avoid any possible legal consequences that may result from an accident.

"NOTICE" FOR BOATS (4/30-5/4)

In late April and early May, the Street Use Inspection Division, in their effort to address abandoned boats, placed "72" hour removal notices on ninety six boats in the Canals which were tied to bridges, railings, the Saltbush barrier along the canals, and brick anchors in the canals. Boats attached to permitted or non-permitted docks were not issued a "Notice."

Because the original dock issue had not been resolved, some residents were concerned that they were in a "Catch 22." They wanted a dock but couldn't build one and yet still received a notice. The Association and other residents brought their concerns to the Council office. They requested prompt action to address the boat "Notices."

On Friday, May 11th, a meeting was held at the Westside Field office of Council President Ruth Galanter. The meeting was arranged and chaired by Peter Brown, Field Deputy. Attending the meeting were representatives from the Bureau of Street Services, Street Use Inspection Division, WLA Bureau of Engineering, and the Venice Canals Association.

The following issues were discussed and decisions made at the meeting:

1. There is a temporary "MORATORIUM" on the "72 hour" boat notice while the "boat docking" issues are resolved.

- a. During this temporary "moratorium" a BOAT CAN BE TIED to a:
 - STAKE IN THE DIRT along the canal bank. Be sure to place the stake away from the roots of the Saltbush, OR
 - Consider removing the boat from the water at this time.
- b. A BOAT may NOT be TIED to a:
 - BRIDGE
 - RAILING along the canals
 - BRICK/CONCRETE BLOCK in the canal used as an anchor, or
 - SALTBUSH BARRIER PLANT along the canals.

The Venice Canals are a designated wetlands. The Saltbush is a wetlands restoration plant. Boats tied to the Saltbush will be moved to the storage area on Grand Canal between North and South Venice Blvd for 30 days before removal from the canals.

2. The Council Office will appoint an advisory committee on boat Issues.

3. Free floating boats, whose owners cannot be identified, and abandoned boats will continue to be moved to the storage area and kept there for 30 days before removal from the canals.

COASTAL COMMISSION
5-92-377-A1

EXHIBIT # 7
PAGE 2 OF 3

4. Develop a safe and legal alternative to building a dock:

The Association is actively working on the following proposal. We have received a favorable first impression from the City. The proposal will be presented to the CA Coastal Commission.

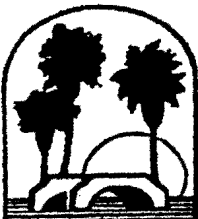
This dock alternative would allow a canal property owner to construct a **gate** next to the sidewalk as an access to the canals. This would provide a **legal** "docking" site **without** building a dock. The gate, as currently designed, is 25 1/2 inches in width and 30 inches in height (the height of the Saltbush plants) and fits into the spaces between the Loffelblock retaining wall. It would be unobtrusive, almost invisible. A permit would be required since the gate would be located in a public right of way.

5. Other areas of discussion at the meeting included :

- a. Need to post existing rules related to boats.
- b. Need a means to identify abandoned boats.

A STRONG REMINDER: DO NOT BUILD A BOAT DOCK.
THEY ARE ILLEGAL. THERE ARE NO PERMITS AT THIS TIME.

We know that the notices by the Street Use Inspection Division have caused frustration and anger. However, your concerns have been passed on to the Council Office and we're encouraged that those concerns are being addressed in ways that will bring more satisfying alternatives. Thank you for your continued input. We will keep you informed.



Venice Canals Association
Post Office Box 893
Venice, CA 90294

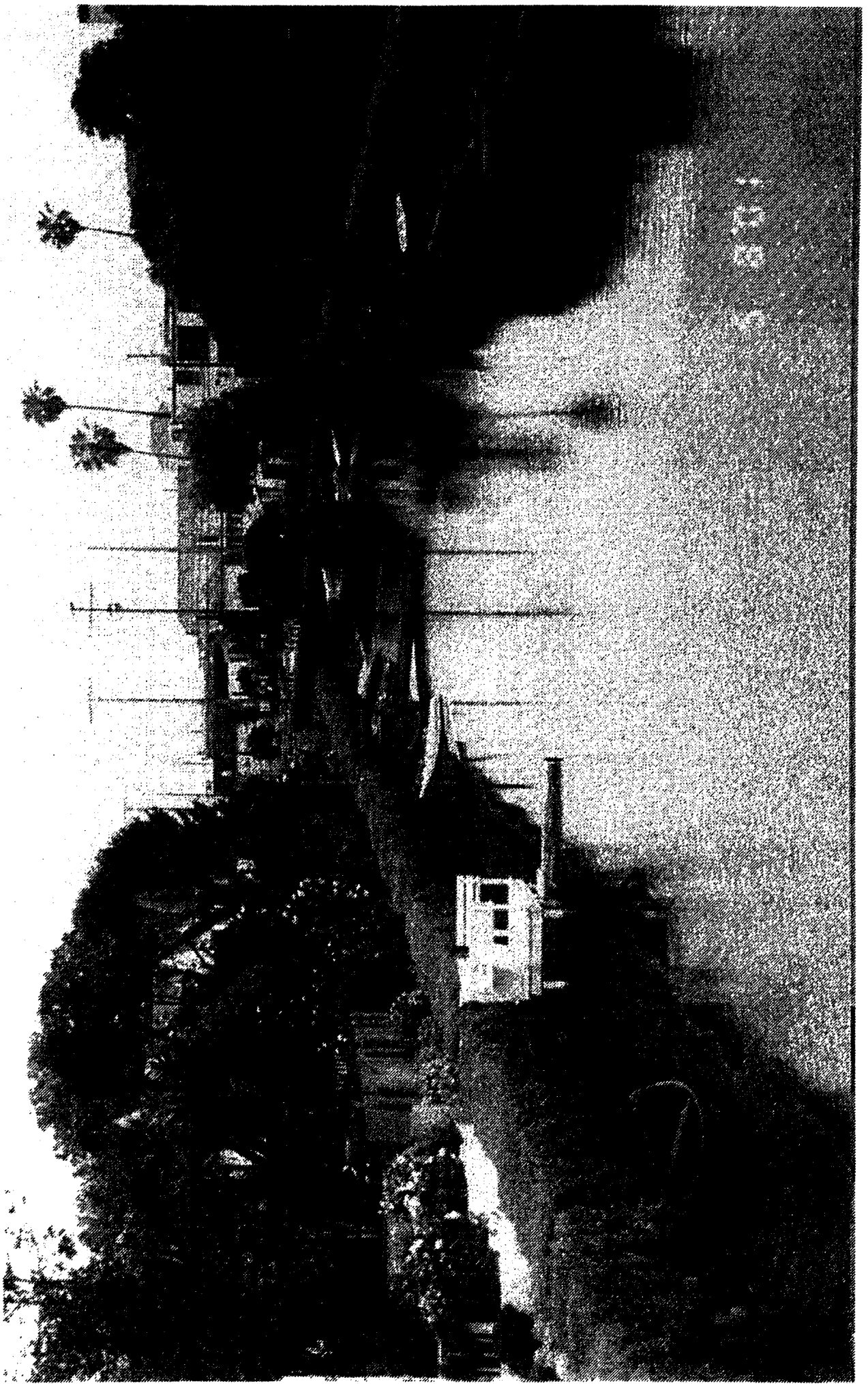
E-MAIL: venicecanalsassoc@excite.com

COASTAL COMMISSION

5-92-377-A1

EXHIBIT # 7

PAGE 3 OF 3



100 5