

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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RECORD PACKET COPY  
**Item Tu10a**

Filed: 5/25/2001  
49th Day: 7/13/2001  
180th Day: 11/21/2001  
Staff: CP-LB  
Staff Report: 6/15/2001  
Hearing Date: July 10, 2001  
Commission Action:



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**STAFF REPORT: PERMIT AMENDMENT****APPLICATION NUMBER:** 5-91-584-A4**APPLICANT:** City of Los Angeles Bureau of Engineering**AGENT:** James E. Doty, Environmental Supervisor**PROJECT LOCATION:** Howland Canal Court, Linnie Canal Court, Carroll Canal Court and Grand Canal Courts (only sections west of Dell Avenue), Venice, City of Los Angeles.**DESCRIPTION OF PROJECT ORIGINALLY APPROVED ON NOVEMBER 14, 1991:**

Rehabilitation of the existing deteriorated Venice Canals system. The canals will be excavated and dredged to their original configuration and fifty-foot width. New embankments and 4.5-foot wide sidewalks will be constructed on the sides of the canals. Seven of nine existing pedestrian bridges will be reconstructed and handicapped access ramps will be added to the Dell Avenue vehicular bridges. A public boat-launching ramp will be constructed on Grand Canal between North and South Venice Boulevard.

**DESCRIPTION OF CURRENT AMENDMENT REQUEST:**

Demolish and reconstruct the Venice Canal courts (alleys) with 6-inch concrete pavement, and upgrade the existing street drains by installing perforated pipelines and new catch basins with sediment and oil/grease filters to reduce the amount of pollutants that enter the waterways.

**SUBSTANTIVE FILE DOCUMENTS:**

1. City of Los Angeles Certified Land Use Plan for Venice.
2. Coastal Development Permit 5-91-584 & amendments (Venice Canals Rehabilitation).

**SUMMARY OF STAFF RECOMMENDATION**

Staff recommends that the Commission grant a permit amendment for the proposed development with conditions relating to: the prevention of adverse impacts to marine resources, compliance with the requirements of the resource agencies, and the applicant's assumption of the risks of the development. The City agrees with the staff recommendation. **See page two for motion** to carry out the staff recommendation.

**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 is a material change to the previously approved Venice Canals rehabilitation project. If the applicant or objector so requests, the Commission shall make an independent determination as to whether the proposed amendment is material. [Title 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 5-91-584 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: This permit amendment does not alter the original conditions of Coastal Development Permit 5-91-584 and prior amendments. All previously imposed special conditions still apply to the approved development. The following special conditions apply to the development approved by this permit amendment.

### 1. Protection of Marine Resources

**PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a project staging and construction plan, subject to the review and approval of the Executive Director, that includes specific staging and construction measures sufficient to prevent the unpermitted deposition, spill or discharge of any liquid or solid into the waters of the Venice Canals. At a minimum, the plan shall include the following provisions:

- a. The storage or stockpiling of soil, silt, other organic or earthen materials, or any materials and chemicals related to the construction shall not occur where such materials/chemicals could pass into the waters of the Venice Canals. Any spills of construction equipment fluids or other hazardous materials shall be immediately contained on-site and disposed of in an environmentally safe manner as soon as possible.
- b. No heavy machinery (except boats) will be allowed in the intertidal or subtidal zones at any time. Construction vehicles operating within fifty feet of any canal shall be inspected daily to ensure there are no leaking fluids. If there are leaking fluids, the construction vehicles shall be serviced immediately. Equipment and machinery shall be serviced, maintained and washed only in confined areas specifically designed to control runoff and prevent discharges into the Venice Canals. Thinners, oils or solvents shall not be discharged into sanitary or storm sewer systems.
- c. Washout from concrete trucks shall be disposed of at a location not subject to runoff and more than fifty feet away from all stormdrains, open ditches and surface waters.
- d. All floatable debris and trash generated by construction activities within the project area shall be disposed of at the end of each day, or as soon as possible.
- e. All grading and excavation areas shall be properly covered and sandbags and/or ditches shall be used to prevent runoff from leaving the site, and measures to control erosion must be implemented at the end of each day's work.

The permittee shall implement and carry out the project staging and construction plan during all construction and cleaning activities consistent with the plan approved by the Executive Director.

2. Conformance with the Requirements of the Resource Agencies

The permittee shall comply with all permit requirements and mitigation measures of the California Department of Fish and Game, Regional Water Quality Control Board, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Service with respect to preservation and protection of water quality and marine environment. Any change in the approved project which may be required by the above-stated agencies shall be submitted to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

3 Assumption of Risk

A) By acceptance of this coastal development permit, the applicant acknowledges and agrees: (i) that the site may be subject to hazards from seismic events, liquefaction, storms, waves, floods and erosion; (ii) to assume the risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards; and (v) to agree to include a provision in any subsequent sublease or assignment of the development authorized by this permit requiring the sublessee or assignee to submit a written agreement to the Commission, for the review and approval of the Executive Director, incorporating all of the foregoing restrictions identified in (i) through (iv).

**B) PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a copy of a written agreement by the applicant, in a form and content acceptable to the Executive Director, accepting all of the above terms of subsection A of this condition.

**III. Findings and Declarations**

The Commission hereby finds and declares:

**A. Amendment Description and Background**

On November 14, 1991, the Commission approved Coastal Development Permit 5-91-584 (City of Los Angeles) for the rehabilitation of the Venice Canals. In 1993, the City completed the permitted dredging, excavation and canal bank reconstruction phases of the Venice Canals rehabilitation project, and constructed new sidewalks along all the canal banks.

The City is now requesting to amend Coastal Development Permit 5-91-584 to include the proposed reconstruction of deteriorated alleys (courts) within the previously approved Venice Canals rehabilitation project. This amendment request includes only the reconstruction of the sections of Howland Canal Court, Linnie Canal Court, Carroll Canal Court and Grand Canal Courts located west of Dell Avenue (Exhibit #2). The City plans to apply for Commission approval to replace the other sections of the alleys at a later date.

The currently proposed project is situated entirely on three islands that are surrounded by the Venice Canals (Exhibit #2). No work is proposed to occur in the waterways, although the existing drains in the canal banks will be replaced as part of the proposed improvement to the street drainage system. Because the project site is completely surrounded by water, all of the surface drainage from the streets, alleys and residential properties is directed into the adjacent canals. The proposed project includes an upgrade of the existing drainage system, including the installation of new catch basins with sediment and oil/grease filters to reduce the amount of pollutants that enter the waterways, and the use of perforated underground pipelines to allow some of the collected runoff to percolate into the ground (Exhibit #6).

The concrete surface of the existing courts (alleys) in the project area will be removed and transported outside of the coastal zone for disposal. The courts, which provide vehicular access to the residences in the project area, are proposed to be resurfaced using a six-inch thick layer of new concrete pavement. The City states that the proposed project will minimize pollution in the waterways and provide much-needed relief from flooding.

## **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. Marine Resources

The Coastal Act contains policies that address development in or near coastal waters. The proposed project is located adjacent to the waters of the Venice Canals (Exhibit #2). The standard of review for the proposed development is the Chapter 3 policies of the Coastal Act, including the following marine resource policies. Sections 30230 and 30231 of the Coastal Act require the protection of biological productivity, public recreation and marine resources.

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.

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.

The proposed project is the removal and replacement of several sections of the Venice Canal courts (alleys) and the underlying drainage system. No work or fill is proposed to occur in the waterways. All work will occur near the waterways, as the proposed site is located on three islands surrounded by the canals (Exhibit #2).

Small sections of the canal banks (where the drains exit the islands) will be deconstructed by hand in order to install the new and improved street drainage system. This involves the removal of some of the Loffelstein blocks that the canal banks were reconstructed with in 1993, installment of new 18-inch diameter drainpipes, and replacement of the Loffelstein blocks in the canal bank. The native wetland vegetation growing in the cells of the Loffelstein blocks will be replanted as the canal banks are returned to their pre-existing condition (Exhibit #6).

The applicant states that all residue from the demolition activity, pipeline and catch basin installation, and resurfacing of the alleys will be contained and removed from the work area to be disposed of properly. No materials are proposed to be or permitted to be placed in the waters of any canal. The City has stated in writing that no dewatering of the canals or area around the pipeline installation will be necessary. Therefore, there will be no discharges into the canals and therefore no anticipated negative impacts to marine resources or water quality. However, in order to ensure that the proposed project does not result in any accidental or unanticipated discharges, spills or other activities that could harm marine resources and water quality, the permit is conditioned to require the applicant to submit plans which incorporate specific construction methods within the proposed project to prevent such occurrences.

Therefore, Special Condition One requires the applicant, prior to the issuance of the permit, to submit a project staging and construction plan that includes specific staging and construction measures sufficient to prevent the unpermitted deposition, spill or discharge of any liquid or solid into the waters of the Venice Canals. Only as conditioned will the proposed project ensure that marine resources and water quality be protected as required by Sections 30230 and 30231 of the Coastal Act.

Special Condition Two requires the permittee to comply with all permit requirements and mitigation measures of the California Department of Fish and Game, Regional Water Quality Control Board, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Service with respect to preservation and protection of water quality and marine environment. The special conditions of approval adequately address and mitigate any potential adverse impacts to the environment caused by the proposed project. Therefore, as conditioned, the proposed project is consistent with the marine resource policies of the Coastal Act.

#### **D. Public Access and Recreation**

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...

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.

The proposed project will temporarily interrupt access to the alleys as the proposed project is being constructed. The alleys, however, provide vehicular access only to the residences in the area. The alleys do not provide access to any public parking facilities, but do serve as public pedestrian ways. Public access in the Venice Canals area, however, is provided primarily by the public sidewalks that run along all of the banks of the Venice Canals, not by the alleys. The proposed project may involve temporary interruption is the use of short segments of the public walkways when the new pipelines are placed beneath the sidewalk. These potential interruptions will be very limited in time and area and will not deny the public from accessing the Venice Canals area. Therefore, the Commission finds that the proposed project will not reduce public access to, along, or through the Venice Canals. Therefore, the amendment, as conditioned, is consistent with the public access and recreation policies of the Coastal Act.

#### **E. Hazards**

The Coastal Act states that new development must minimize risks to life and property and not create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area.

Section 30253 of the Coastal Act states, in part:



New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Developments located in or near the ocean have the potential for damage caused by wave energy, floods, seismic events, storms and erosion. No development near the water can be guaranteed to be safe from hazard.

The proposed project is located on islands surrounded by the Venice Canal waterways. The Venice Canals neighborhood is susceptible to flooding due to its low elevation in relation to sea level. The City and county operate tidal gates to control the water level in the canals. In the past, periods of heavy precipitation occurring at the same time as high tidal levels has resulted in flooding of the lower levels of the homes situated next to the canals. The sandy substrata beneath the Venice Canals neighborhood make the area susceptible to liquefaction during seismic events.

The Commission routinely imposes conditions for assumption of risk in areas at high risk from hazards. The condition ensures that the permittee understands and assumes the potential hazards associated with development in or near the water.

Therefore, by acceptance of this coastal development permit, the applicant acknowledges and agrees: (i) that the site may be subject to hazards from seismic events, liquefaction, storms, waves, floods and erosion; (ii) to assume the risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards; and (v) to agree to include a provision in any subsequent sublease or assignment of the development authorized by this permit requiring the sublessee or assignee to submit a written agreement to the Commission, for the review and approval of the Executive Director, incorporating all of the foregoing restrictions identified in (i) through (iv).

Prior to issuance of the coastal development permit, the applicant shall submit a copy of a written agreement by the applicant, in a form and content acceptable to the Executive Director, accepting all of the above terms of subsection A of this condition. Only as conditioned is the proposed project is consistent with Section 30253 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. On June 14, 2001, the Venice LUP was officially certified by the Commission.

The certified Venice LUP contains the following relevant policies:

- **Policy IV. E. 1.** *The banks, waterways and public walkways of the Venice Canals, Ballona Lagoon and Grand Canal south of Washington Boulevard shall be periodically maintained by the City or other appropriate entity, to keep these areas free of accumulated trash and wastes, thereby maintaining the biological, water quality, recreational and aesthetic resources of these areas.*
- **Policy V. A. 3. Infrastructure.** *New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible. The City of Los Angeles Department of Public Works shall develop a comprehensive citywide Storm Water Management Program, as discussed further in Implementation Strategy of Policy IV.C.1 of this LUP, to control stormwater run-off from new public and private developments and, where feasible, to remove pollutants from that run-off. Development of infrastructure shall precede or be constructed concurrently with the construction of developments or in lieu-fee should be paid.*

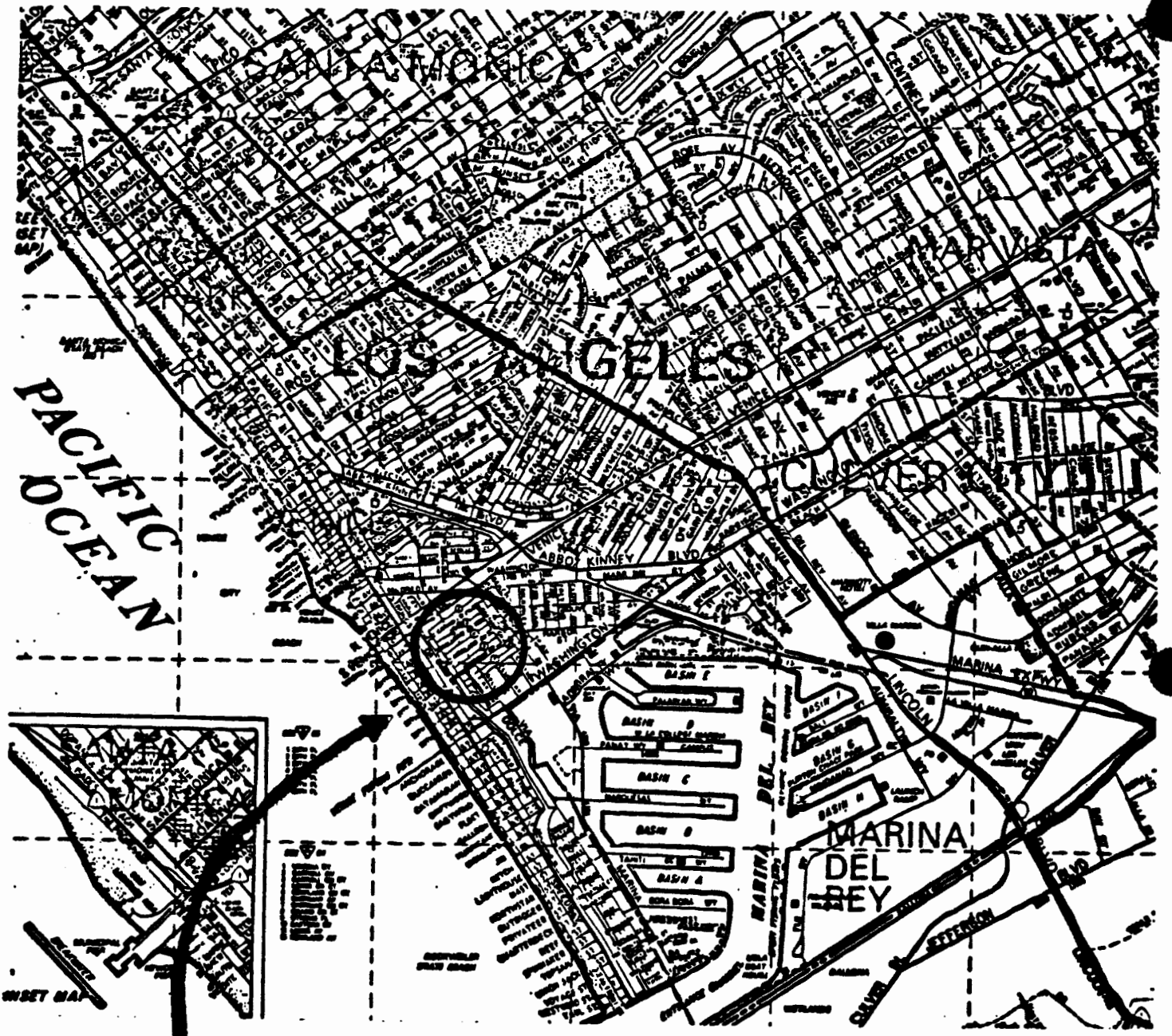
- **Policy IV. C. 2. Water Quality.** *The methods to improve water quality, recommended in California's Plan for the Control of Non-Point Source Pollution (January 2000), such as watershed planning and management programs, and habitat restoration projects, shall be considered and implemented by the City of Los Angeles where feasible opportunities exist. Selected Best Management Practices (BMPs) or suites of BMPs shall be designed to treat, infiltrate or filter the stormwater runoff from each runoff event up to and including the 85<sup>th</sup> percentile, 24-hour runoff event for volume based BMPs and/or the 85<sup>th</sup> percentile, 1 hour event, with an appropriate safety factor, for flow-based BMPs.*

The proposed project does not conflict with any provisions of the certified Venice LUP. The proposed project and amendment, as conditioned, are 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 proposed project 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.



Site

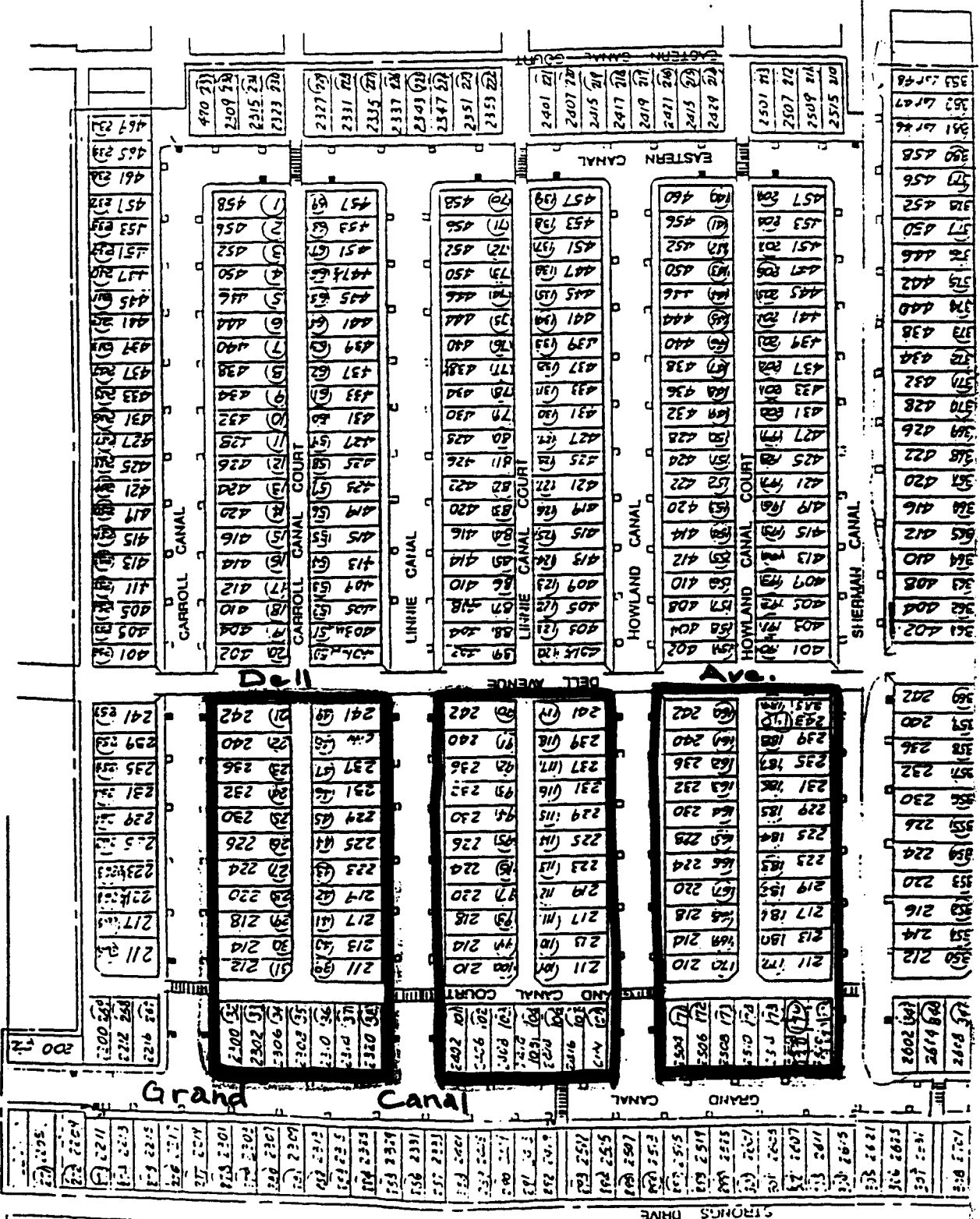
VENICE Canals

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5-91-584-A4

EXHIBIT # 1

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See Ex. 3  
Carroll crt.

See Ex. 4  
Linnie crt.

See Ex. 5  
Howland crt.

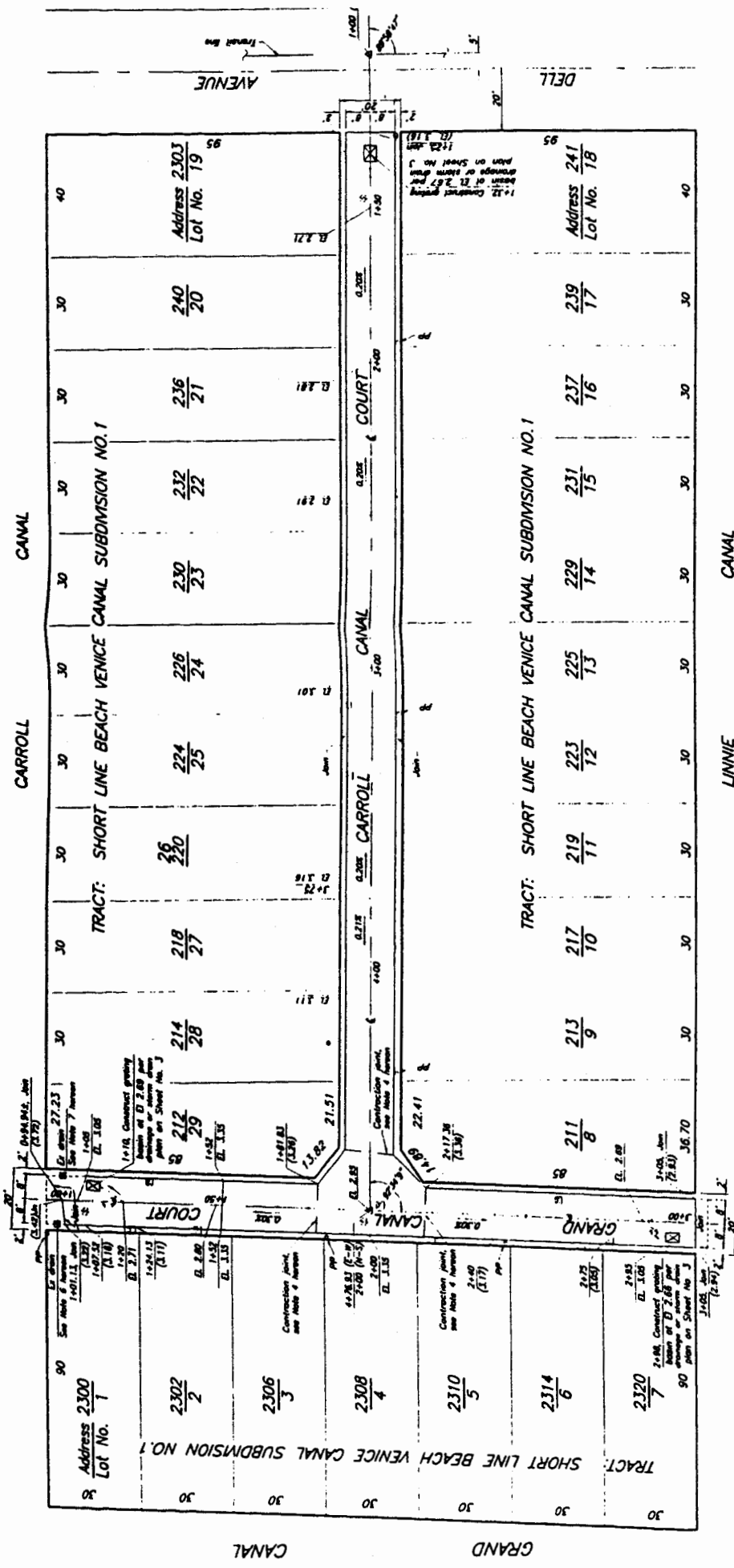
Project Area

North

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5-91-584-A4

EXHIBIT # 2

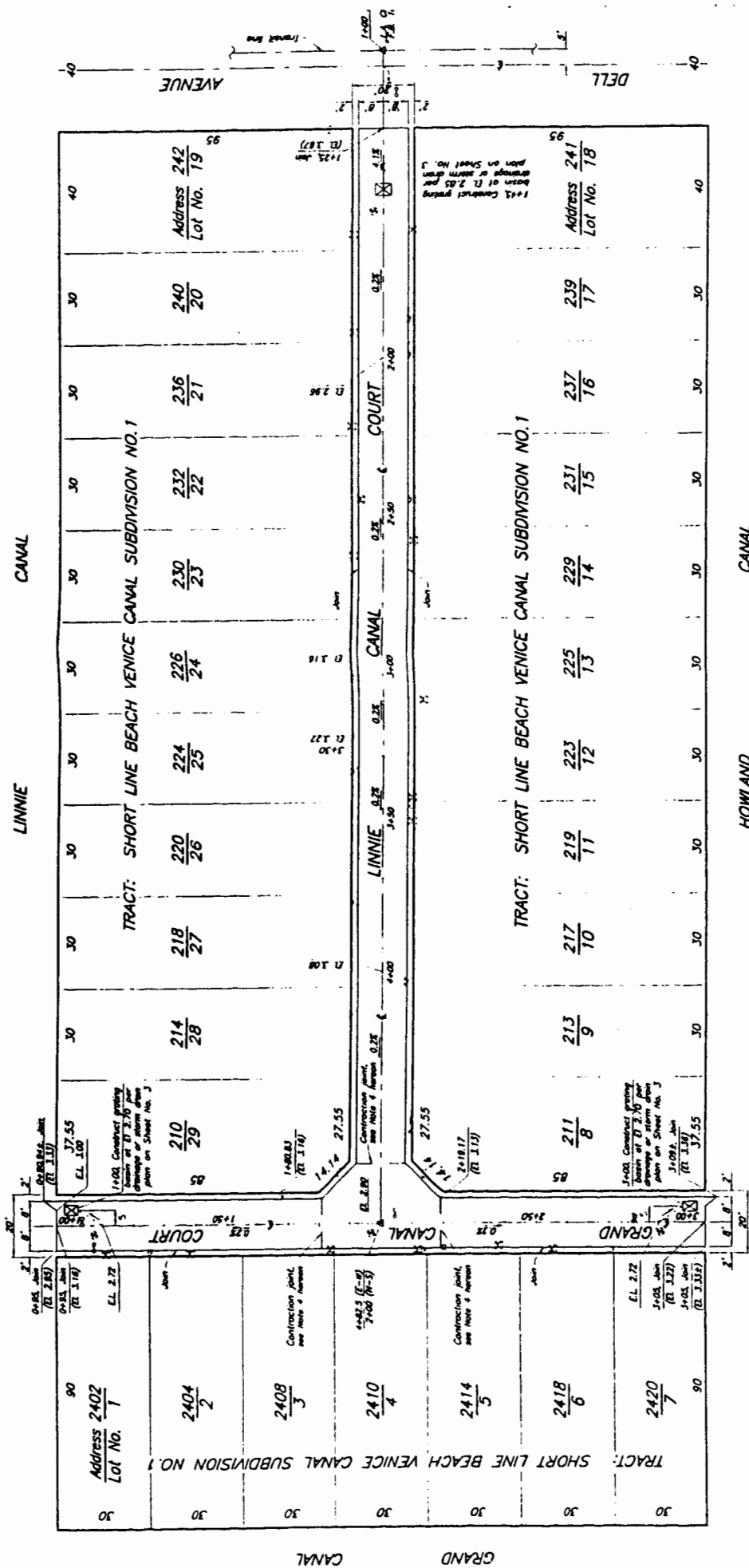
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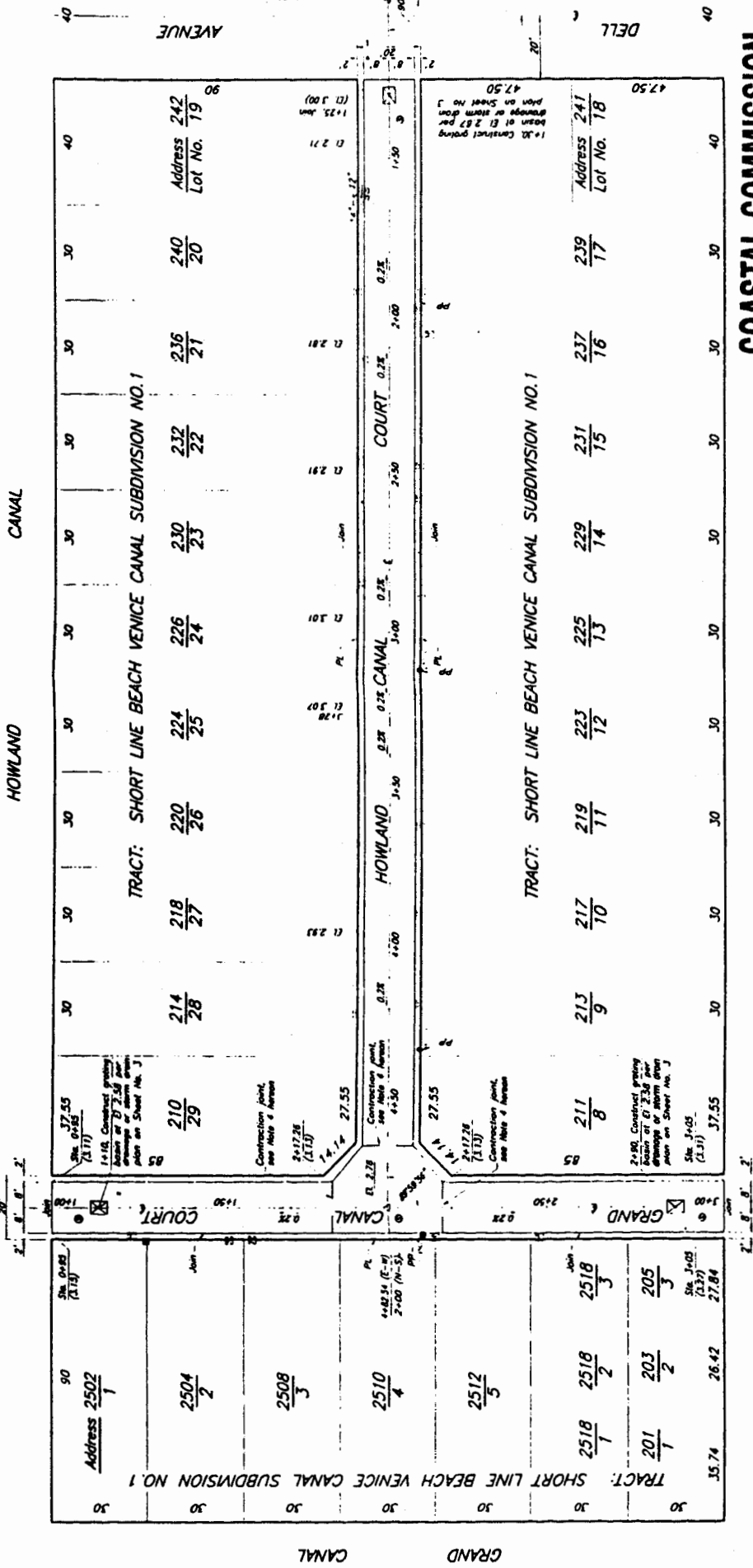
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**5-91-584-A4**

EXHIBIT # 3

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**COASTAL COMMISSION**  
**5-91-584-A4**  
 EXHIBIT # 4  
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TRACT: SHORT LINE BEACH VENICE CANAL SUBDIVISION NO. 1

TRACT: SHORT LINE BEACH VENICE CANAL SUBDIVISION NO. 1

COASTAL COMMISSION  
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EXHIBIT # 5

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CITY OF LOS ANGELES  
CALIFORNIA

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May 25, 2001

Ms. Charles Posner  
California Coastal Commission  
South Coast Area Office  
200 Oceangate, Suite 1000  
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**RECEIVED**  
South Coast Region

JUN 1 2001

CALIFORNIA  
COASTAL COMMISSION

**VENICE CANAL COURTS IMPROVEMENTS (No. 5-91-584-A4)**

Mr. Posner:

We are in receipt of your letter dated May 18, 2001 requesting additional information on application No. 5-91-584-A4. Please note the following in response to your request:

The construction method for installing the perforated pipe into the canal embankments will involve hand removal only of the Loffelblock cells. Once the pipe is placed, the Loffelblock cells will be placed back into position around the pipe and replanted with the same wetland plant species originally required for the Venice Canals project. The finished embankment will be identical in appearance to the pre-existing conditions, save for the new pipe. **No dewatering of the canals or area around the installation will be necessary.**

Demolition and paving activities will be according to standard construction methods and plan notes and details. Per plan note #2 on sheet 2 of each plan set, all existing improvements, including concrete pavement and AC pavement, that is interfering with construction activities will be removed.

Dewatering of ground water, while noted on the plans in the event it becomes necessary, is not expected to be necessary due to the depth of ground water (5 feet below ground surface) found in that area. Our improvements will not be deep enough to reach the ground water.

To protect water quality in the canals during construction, the contractor shall be required to clean out all existing drainage systems, if any, draining into the canals (see plan note #6 on sheet 2). This is in addition to the obvious improvements to water quality that will be accrued to the canals by installing the filtered catch basins, which will remove oil and sediments from the runoff. Also, the perforated pipe will allow for most of the dry weather flow to percolate into the ground rather than flow into the canals as it presently does.

If you have any questions regarding this application, please call Mr. Russell Ruffing of my office at (213) 847-8788. Thank you for your attention to this matter.

Sincerely,

VITALY B. TROYAN, P.E.  
City Engineer

**COASTAL COMMISSION**

By

*Russell C Ruffing for ARJ*  
ARA J. KASPARIAN, Ph.D.  
Group Manager  
Environmental Group

EXHIBIT # 6  
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