

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
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VENTURA, CA 93001
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Filed: 12/15/04

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Staff: LF-V *SH*

Staff Report: 12/16/04

Hearing Date: 1/12/05

Commission Action:



RECORD PACKET COPY

STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.: 4-04-126

APPLICANT: City of Ventura

PROJECT LOCATION: Ventura Pier, California Street/Harbor Boulevard, City of Ventura, (Ventura County).

PROJECT DESCRIPTION: Replacement in kind of seven damaged wooden timber pilings and ten wooden cross braces, and request for after-the-fact approval for replacement in kind of one additional damaged wooden timber piling. The project includes weekday closure of portions of the pier seaward of an existing visitor-serving commercial area containing a restaurant, snack and bait shop, and public restrooms, for the duration of the approximately four week long project. The project also includes use of a vacant area between the bike path and parking lot east of the pier for temporary storage of the pilings; storage of all other construction equipment and materials within a chain link enclosure on the pier; and disposal of all debris at a licensed facility approved for such material. Removal and placement of pilings will be conducted from the pier with a Dalmag 822 crane with a 50-ton capacity pile driving attachment. A diver will break off the damaged pilings below the mud line with a hydraulic chain saw.

SUBSTANTIVE FILE DOCUMENTS: "Inspection and Removal of Marine Growth at the Ventura Pier," Divecon Services, April 15, 2003; "Use of Creosote-treated Wood Products (e.g., pilings) in Marine Waters of the State of California," California Department of Fish and Game, September 10, 1998; Coastal Development Permit (CDP) No. 4-02-212; CDP No. 4-98-293; CDP No. 4-01-198; CDP No. 4-01-134.

LOCAL APPROVALS RECEIVED: Approval in concept, City of San Buenaventura Planning Department, dated December 10, 2004.

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends **approval** of the proposed project with **six (6) special conditions** regarding Best Management Practices, Storage of Construction Materials, Mechanized Equipment, and Removal of Construction Debris; Disposal of Construction Debris; Required Approvals; Assumption of Risk; Project Timing; and Condition Compliance.

I. STAFF RECOMMENDATION

MOTION: *I move that the Commission approve Coastal Development Permit No. 4-04-126 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

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

RESOLUTION TO APPROVE THE PERMITS:

The Commission hereby approves the Coastal Development Permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permits 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 development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

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

III. SPECIAL CONDITIONS

1. Best Management Practices, Storage of Construction Materials, Mechanized Equipment, and Removal of Construction Debris

Prior to the issuance of the coastal development permit, the applicant shall submit for the review and approval of the Executive Director, a Best Management Practices Plan. The plan shall be subject to the following requirements, and shall at a minimum, include the following components:

- a. Construction debris and sediment shall be properly contained and secured on site with Best Management Practices (BMPs), or removed from construction areas, each day that construction occurs, to prevent the accumulation and/or unintended transport of sediment and other debris by wind, rain or tracking, which may discharge into coastal waters. Debris shall be disposed of at an appropriate debris disposal site pursuant to Special Condition Two (2).
- b. Best Management Practices (BMPs) designed to prevent spillage and/or run-off of construction related materials, sediment, or contaminants associated with construction activity, shall be implemented prior to the onset of such activity. Selected BMPs shall be maintained in a functional condition throughout the duration of the project.
- c. No construction materials, debris, or waste shall be placed or stored where it may be subject to wave erosion and dispersion.
- d. Any and all debris resulting from construction activities shall be removed from the project site within 24 hours of completion of construction.

2. Disposal of Construction Debris

Prior to the issuance of the coastal development permit, the applicant shall provide evidence to the Executive Director of the location of the disposal site for all debris/excavated material from the site. Should the dumpsite be located in the coastal zone, a coastal development permit shall be required.

3. Required Approvals

Prior to commencement of construction, the applicant agrees to obtain, and provide evidence to the Executive Director of, all other State or Federal permits that may be necessary for construction of the proposed development (including permits from the California State Lands Commission, California Department of Fish and Game, California Regional Water Quality Control Board, and the United States Army Corps of Engineers) and/or evidence that notice has been provided to such agencies and no permit is required.

4. Assumption of Risk, Waiver of Liability, and Indemnity Agreement

Prior to issuance of the coastal development permit, the applicant shall submit a written agreement, in a form and content acceptable to the Executive Director, which states that the applicant acknowledges and agrees (i) that the site may be subject to hazards from storm waves, surges, erosion, and flooding; (ii) to assume the risks to the applicant 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; and (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.

5. Project Timing

By acceptance of this permit, the applicant agrees that construction activities shall be undertaken during a four-week period of consecutive weekdays between Labor Day and Memorial Day. An additional workweek may be utilized if necessary to complete authorized activities, but in no case may project activities be undertaken during weekend days or public holidays. The Executive Director may extend the time allowed to complete authorized activities upon a showing of good cause to the Executive Director's satisfaction.

6. Condition Compliance

Within 90 days of Commission action on this coastal development permit application, or within such additional time as the Executive Director may grant for good cause, the applicant shall satisfy all requirements specified in the conditions hereto that the applicant is required to satisfy prior to issuance of this permit. Failure to comply with this requirement may result in the institution of enforcement action under the provisions of Chapter 9 of the Coastal Act.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares as follows:

A. Project Description and Background

The applicant's proposal includes replacement in kind of seven damaged wooden timber pilings and ten wooden cross braces, and a request for after-the-fact approval for replacement in kind of one additional damaged wooden timber piling. The project includes weekday closure of portions of the pier seaward of an existing visitor-serving commercial area containing a restaurant, snack and bait shop, and public restrooms, for the duration of the approximately four week long project. The project also includes use of a vacant area between the bike path and parking lot east of the pier for temporary storage of the pilings; storage of all other construction equipment and materials within a chain link enclosure on the pier; and disposal of all debris at a

licensed facility approved for such material. Removal and placement of pilings will be conducted from the pier with a Dalmag 822 crane with a 50-ton capacity pile driving attachment. A diver will break off the damaged pilings below the mud line with a hydraulic chain saw.

The Ventura Pier is a historic structure (originally constructed in 1872) that is used by the public for fishing and other recreational purposes. The pier is owned by the City and is located at the western edge of San Buenaventura State Beach. The landward-most portion of the pier contains visitor-serving commercial uses including a restaurant, snack and bait shop, and public restrooms. These facilities will remain open throughout the proposed construction period.

In January 1999, the Commission approved a permit for the construction of an approximately 80 foot long by 70 foot wide octagonal extension to the end of the pier, to replace a 423 foot long portion of the pier that was destroyed by wave damage. The proposed project is located landward of the pier extension.

Work on the proposed project was begun, and one of the pilings was replaced in kind, prior to submittal of this application. However, after consultation with Commission staff, the applicant agreed to immediately stop all work until the necessary coastal permit had been obtained. As noted above, the applicant seeks after-the-fact approval for replacement of the single piling that has already been installed.

B. Public Access

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 30212 of the Coastal Act states (in part):

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects...

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.

Coastal Act Sections 30210, 30211, and 30212 mandate that maximum access and recreational opportunities shall be provided, consistent with public safety and the protection of coastal resources. Specifically, Sections 30210 and 30212 of the Coastal Act provides that development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, and that maximum access shall be provided for all people consistent with public safety needs, the need to protect public rights, the rights of private property owners, and the need to protect natural resource areas from overuse. Sections 30220 and 30221 of the Coastal Act requires that coastal areas suited for coastal recreational activities, that cannot be provided at inland water areas, be protected.

The historic Ventura Pier, located adjacent to San Buenaventura State Beach, is a popular recreational facility for residents and visitors to the City of Ventura. The landward most portion of the pier contains visitor-serving commercial uses including a restaurant, snack and bait shop, and public restrooms. These facilities will remain open throughout the proposed construction period. However, the replacement of the pilings and cross-braces along the mid section of the pier will require the closure of the pier seaward of the visitor-serving commercial area for safety purposes.

The proposed construction will occur only on weekdays. The applicant proposes to open the pier for normal hours on weekends and evenings, with the exception of the equipment storage and staging area, which will be surrounded by chain-link fence. Thus impacts to public access during peak use hours will be reduced. The applicants intend to begin construction as soon as possible.

In order to ensure that impacts to public access and recreation are minimized to the maximum extent possible, **Special Condition Five (5)** requires the applicant to agree, by acceptance of the permit, to undertake construction activities during a four-week period of consecutive weekdays between Labor Day and Memorial Day. **Special Condition Five (5)** is necessary to ensure that the temporary closure of the pier is restricted to the non-summer months, when the pier receives fewer visitors, and to weekdays as proposed by the applicant.

As all work on the pier will be conducted from the existing decking, or by divers using hand-held equipment, the construction activities will not require permanent or temporary use or occupation of the sandy beach. The project does include use of a small vacant area between the bike path and parking lot east of the pier for temporary storage of the pilings. This proposed staging area is not maintained for recreational use and is not suitable for parking. Therefore, use of this area for pilings storage will not adversely impact public access or coastal recreation. The Commission notes that the proposed project is intended to support the type of coastal dependent recreation facility that is permitted in open coastal waters.

The Commission finds that, as conditioned, the proposed project will minimize adverse effects to public access and recreation during its four-week construction phase. Further, upon completion of the repairs, the pier will be reopened for public use and the proposed project will result in continued and safe use benefits for coastal public access and recreational

opportunities. Therefore, the Commission finds that the proposed development, as conditioned, is consistent with Sections 30210, 30211, 30212, 30220, and 30221 of the Coastal Act.

C. Coastal 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.

Section 30233(a) of the Coastal Act states in part:

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:

...

- (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.***

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 those resources shall be allowed within those 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 those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30230 requires that uses of the marine environment be carried out in a manner that will sustain the biological productivity of coastal waters for long-term commercial, recreational, scientific, and educational purposes. In addition, Section 30231 requires that the biological productivity and quality of coastal waters be maintained. Section 30233 limits development in open coastal waters to boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities. Finally, Section 30240 states that only development that is resource dependent may be allowed within environmentally sensitive habitat areas and requires development to be sited and designed to prevent impacts on environmentally sensitive habitat areas, parks, and recreation areas.

The proposed project involves the replacement of eight wood pilings and ten cross-braces necessary to support an existing public pier. As all work on the pier will be conducted from the existing decking, or by divers using hand-held equipment, the construction activities will not require permanent or temporary use or occupation of the sandy beach. The project does include use of a small vacant area between the bike path and parking lot east of the pier for temporary storage of the pilings. This proposed staging area contains sparse ruderal vegetation and is not maintained for recreational use. Use of this area for pilings storage will not degrade the habitat or recreational values of the park.

The proposed project includes the removal of damaged wood pilings and the replacement with new wood pilings. Therefore, the proposed project does constitute "fill" within the meaning of Section 30233 of the Coastal Act. The Commission notes, however, that the proposed fill project (replacement of existing pilings) is specified as an allowable use under Coastal Act Section 30233(a)(4) (i.e., recreational piers providing public access and recreational activities) when adverse effects to the marine environment are minimized.

The applicant is proposing to use wooden pilings that have been treated with creosote and wrapped with polyvinylchloride (PVC) matting to prevent transfer of the creosote into the marine environment. The California Department of Fish and Game (CDFG) has reviewed similar proposals to use creosote treated and wrapped pilings and has found them consistent with the department's position on the use of creosote treated wood pilings for the repair of existing structures in marine waters (CDP No. 4-01-134, CDP No. 4-02-212). In addition, in order to ensure that the proposed project is consistent with all CDFG and other agency regulations, **Special Condition Three (3)** requires the applicant to agree to obtain all necessary approvals from the CDFG, United States Army Corps of Engineers, California State Lands Commission, and/or the Regional Water Quality Control Board prior to commencement of construction, or evidence that notice has been provided to such agencies and no permit is required. Therefore, as conditioned, the applicant has designed the project to reduce potential adverse impacts to the marine environment, as required under Sections 30230, 30231, 30233, and 30240 of the Coastal Act.

The proposed project has been designed in a manner to minimize adverse effects to the coastal and marine resources on and adjacent to the subject site. However, the proposed project may result in potential adverse effects to surrounding habitat due to unintentional disturbance from construction equipment, materials, and/or debris. Construction activities associated with the proposed project could result in the generation of debris and/or presence of equipment, materials and hazardous substances that could be subject run-off and wind dispersion into the marine environment. The presence of construction equipment, building materials, and debris on

the subject site could pose hazards to sensitive marine organisms if construction site materials were discharged into the marine environment or left inappropriately on the project site. In addition, such potential discharges and disturbances to the marine environment could result in adverse effects to offshore habitat from increased turbidity and pollutants of coastal waters.

To protect marine resources and coastal water quality and to ensure that construction related adverse effects to the marine environment are minimized, **Special Condition One (1)** of the subject permit requires the applicant to implement Best Management Practices (BMPs) throughout the duration of the proposed development. **Special Condition One (1)** requires the applicant to implement BMPs designed to prevent spillage and/or run-off of construction related materials, sediment, or contaminants associated with the construction activities and to prevent the accumulation and/or unintended transport of such pollutants and debris by wind, rain, or tracking that may result in discharge into the marine environment. The applicant shall be required to implement appropriate BMPs for the proposed project prior to the onset of the proposed construction activities and maintain the BMPs in a functional condition throughout the duration of the project. **Special Condition One (1)** also requires the applicant to ensure that no construction materials, debris, or waste shall be placed or stored where it may be subject to wave erosion and dispersion and requires any and all debris resulting from construction activities to be removed from the project site within 24 hours of completion of construction. To further minimize the potential for unintended transport of debris or hazardous substances into coastal waters, **Special Condition Two (2)** of the subject permit requires that all construction debris be disposed of at an appropriate debris disposal site, and requires the applicant to provide evidence to the Executive Director of the disposal site prior to issuance of the CDP. The proposed development, as designed and conditioned, will serve to minimize potential adverse impacts to marine resources and coastal waters.

Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Sections 30230, 30231, 30233, and 30240 of the Coastal Act.

D. Hazards and Shoreline Processes

Section 30253 of the Coastal Act states, in part, that 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.***

Section 30253 of the Coastal Act mandates that new development provide for geologic stability and integrity and minimize risks to life and property. The Ventura Pier, like all wood piers along the California coast, is subject to a variety of hazardous conditions, including high waves and periodic fires.

The applicant has submitted a report entitled "Inspection and Removal of Marine Growth at the Ventura Pier," by Divecon Services, dated April 15, 2003 that confirms the need to replace the deteriorated pilings.

In addition, based on the information submitted by the City, the proposed development is located in an area of the Coastal Zone that has been identified as subject to potential hazards from wave action during the winter storm season. The pier has previously been subject to substantial damage as the result of storm occurrences in 1986 and 1995.

Although the proposed project will increase the stability of the developed portions of the subject site in relation to wave caused erosion, there remains some inherent risk to development on such sites. The Coastal Act recognizes that certain types of development, such as the proposed project to replace damaged pilings and cross braces on the pier, may involve the taking of some risk. Coastal Act policies require the Commission to establish the appropriate degree of risk acceptable for the proposed development and to determine who should assume the risk. When development in areas of identified hazards is proposed, the Commission considers the hazard associated with the project site and the potential cost to the public, as well as the owner's property rights. As such, the Commission finds that due to the unforeseen possibility of liquefaction, storm waves, surges, erosion, fire, and flooding, the applicant shall assume these risks as a condition of approval.

Therefore, **Special Condition Four (4)** requires the applicant to waive any claim of liability against the Commission for damage to life or property that may occur as a result of the permitted development. The applicant's assumption of risk will demonstrate that the applicant is aware of and appreciates the nature of the hazards which exist on the site and which may adversely affect the stability or safety of the proposed development.

As the project site is located in an area which is periodically subject to waves, storm surge, and flooding, which has the potential to cause damage to structures or injury to those frequenting the area, it is necessary to indemnify the Commission or any or its agents or representatives against any claims of liability arising from the permitted development. **Special Condition Four (4)** requires that the applicant submit a signed document which shall indemnify and hold harmless the California Coastal Commission, its officers, agents, and employees against any and all claims, demands, damages, costs, and expenses of liability arising out of the acquisition, design, construction operation, maintenance, existence, or failure of the permitted project.

As noted above, the proposed project will involve the replacement of pilings and cross braces and the use of heavy equipment on the pier. Although the applicant has stated that no equipment, debris, or materials will be stored or disposed of on the beach or in the coastal waters, the proposed project has the potential to generate debris and the presence of equipment and materials that could be subject to tidal action on the beach. The presence of construction equipment, building materials, and debris on the subject site could pose hazards to beachgoers or swimmers if construction site materials were discharged into the marine environment or left inappropriately or unsafely exposed on the project site. Therefore, in order to ensure that potential hazards are minimized, **Special Condition One (1)** requires the applicant to ensure that no stockpiling of debris or construction materials shall occur on the sandy beach or coastal waters and that any and all debris resulting from the construction period shall be immediately removed from the project site. In addition, for the same reasons, **Special Condition Two (2)** requires the applicant to dispose of all debris at an appropriate location.

Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Coastal Act Section 30253.

E. Violation

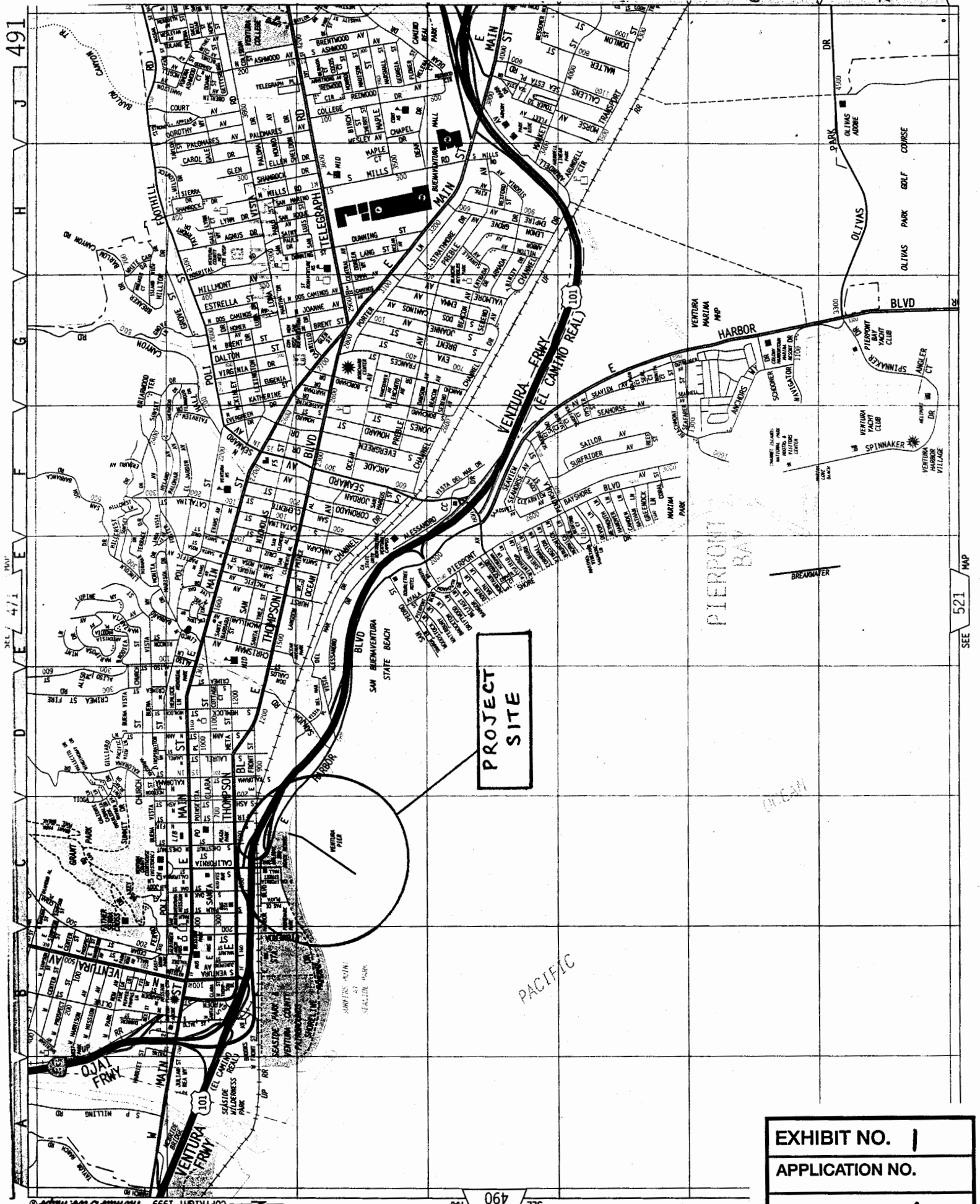
Unpermitted development has occurred on the subject site, including the replacement in kind of one wooden timber piling. The applicant requests after-the-fact approval for the development described above. The subject permit application addresses the unpermitted development, as well as the new development proposed in the subject application. In order to ensure that the matter of unpermitted development is resolved in a timely manner, **Special Condition Six (6)** requires that the applicant satisfy all conditions of this permit within 90 days of Commission action.

Consideration of this application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Review of this permit does not constitute a waiver of any legal action with regard to the alleged violation nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal development permit.

F. 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 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 Commission finds that, the proposed project, as conditioned will not have significant adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970. Therefore, the proposed project, as conditioned, has been adequately mitigated and is determined to be consistent with CEQA and the policies of the Coastal Act.



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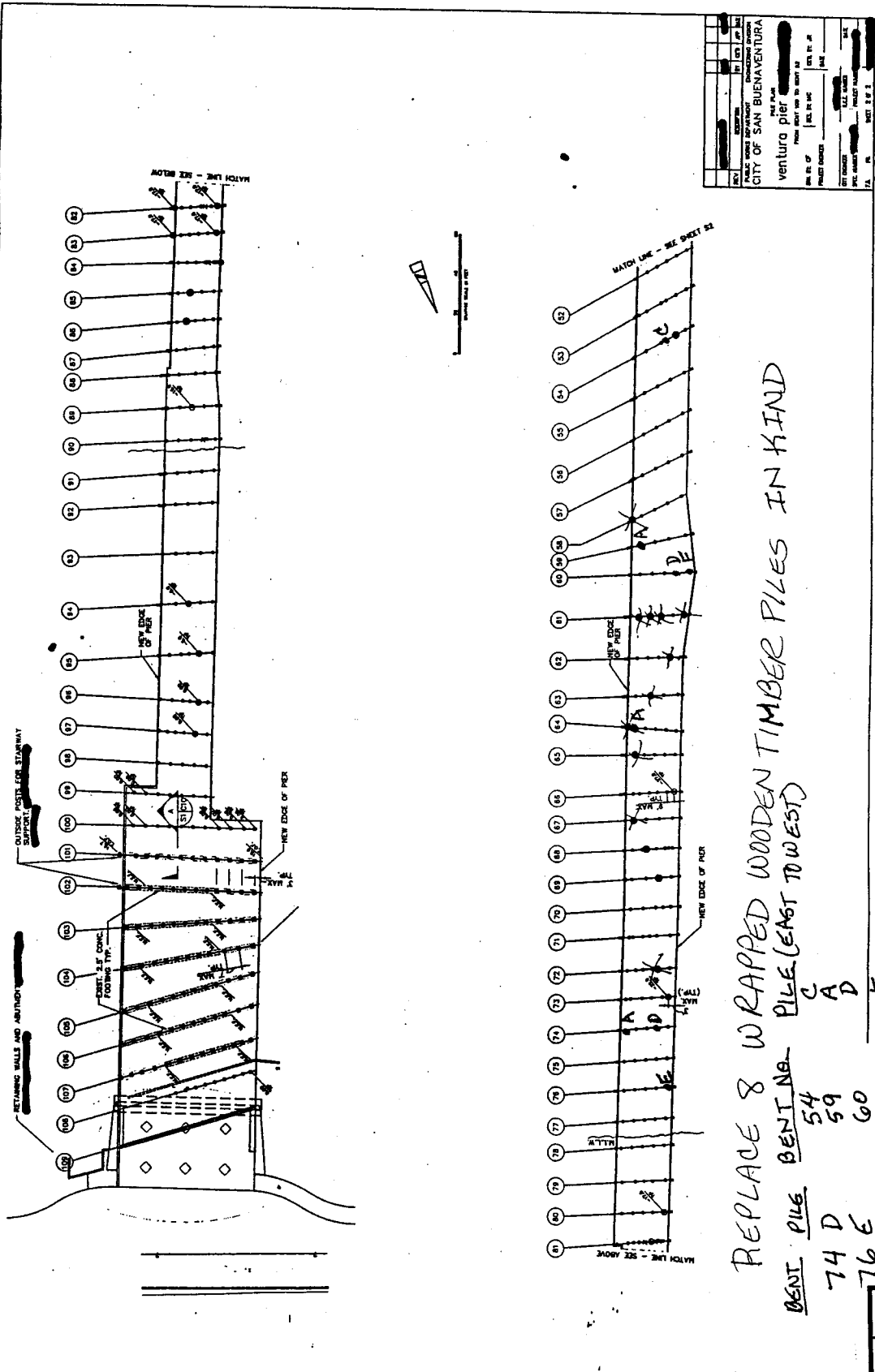
PROJECT SITE

PIERPONT BAY

PACIFIC

EXHIBIT NO. 1
APPLICATION NO.
4-04-126
VICINITY MAP

4-04-126
 VENTURA PIER MAINTENANCE PROJECT
 CITY OF SAN BUENAVENTURA



DATE	BY	CHECKED	DATE
PUBLIC WORKS DEPARTMENT CITY OF SAN BUENAVENTURA PROJECT NO. VENTURA PIER SHEET NO. 2 OF 2			

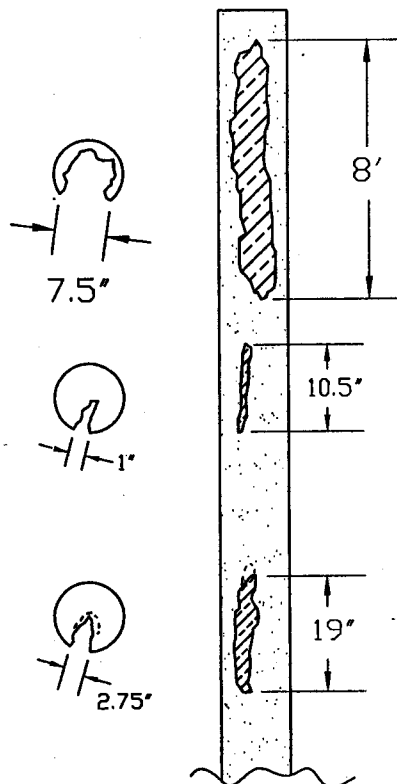
REPLACE 8 WRAPPED WOODEN TIMBER PILES IN KIND
 BENT PILE BENT NO. PILE (EAST TO WEST)
 74 D 54 C
 76 E 59 A D
 60 60 F
 64 A
 74 A

EXHIBIT NO. 2
APPLICATION NO.
4-04-126
SITE PLAN

DAMAGED WOOD PILE REPORT 54 C

BENT # 54 **Damaged Area: -6' to -14'**
PILE: C **Type of Damage: Bio**
Estimated Section Loss: 90%

DAMAGE:
H. 8'
W. 7-1/2"
D. 13"



BENT # 54
PILE: C

DAMAGE:
H. 10-1/2"
W. 3/4" to 1"
D. 5-1/2"

Damaged Area: -18'
Type of Damage: Bio
Estimated Section Loss: 15%



BENT # 54
PILE: C

DAMAGE:
H. 19" + 4"
W. 2-3/4"
D. 3-1/2"

Damaged Area: Bottom
Type of Damage: Bio
Estimated Section Loss: 30%

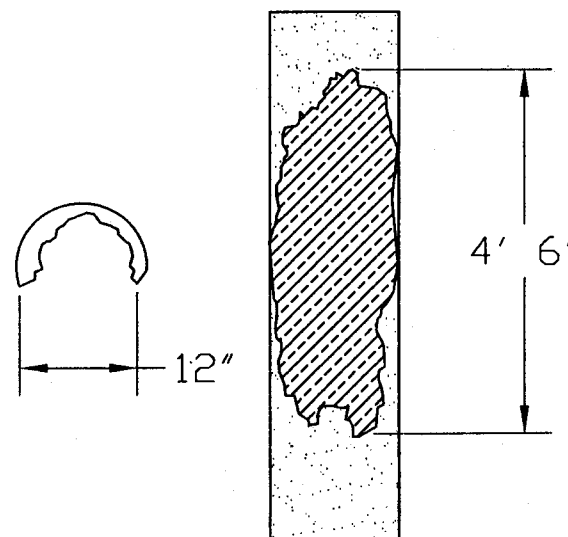
NOTE: 12 O'clock Position looking Inshore
For Top View Picture

DAMAGED WOOD PILE REPORT BENT 59 A

BENT # 59
PILE: A

Damaged Area: -8'
Type of Damage: Bio
Estimated Section Loss: 90%

DAMAGE:
H. 4' 6"
W. 12"
D. 8"



NOTE: 12 O'clock Position looking Inshore
For Top View Picture

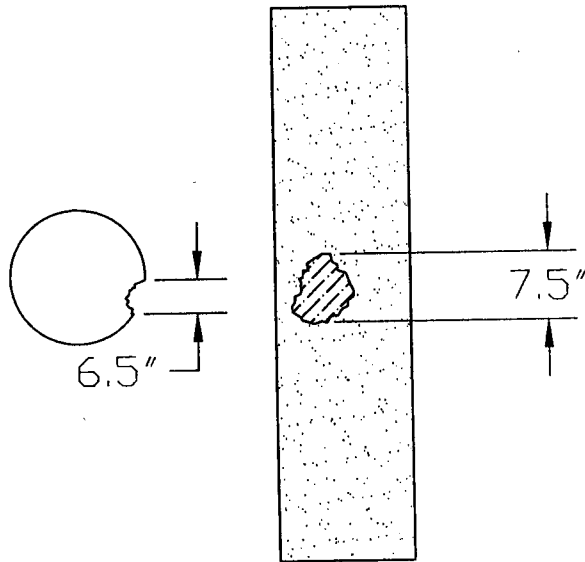
EXHIBIT NO. 3
APPLICATION NO.
4-04-126
DAMAGE REPORTS (4)

DAMAGED WOOD PILE REPORT, BENT 60 D

**BENT # 60
PILE: D**

**Damaged Area: -8'
Type of Damage: Bio
Estimated Section Loss: 5%**

**DAMAGE:
H. 7-1/2"
W. 6-1/2"
D. 1/2"**



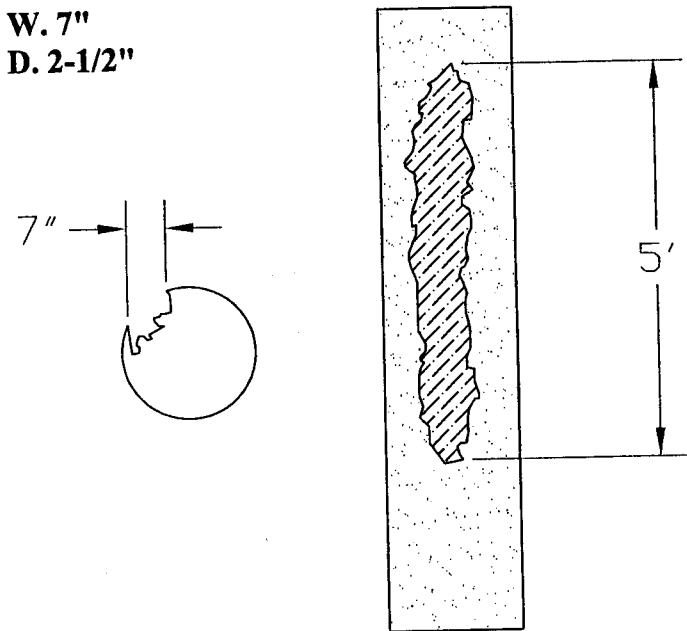
**NOTE: 12 O'clock Position looking Inshore
For Top View Picture**

DAMAGED WOOD PILE REPORT BENT 64 A

**BENT # 64
PILE: A**

**Damaged Area: +2'
Type of Damage: Bio
Estimated Section Loss: 20%**

**DAMAGE:
H. 5'
W. 7"
D. 2-1/2"**



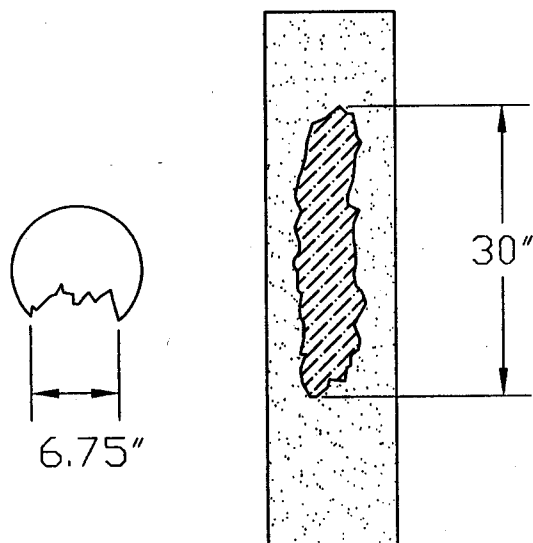
**NOTE: 12 O'clock Position looking Inshore
For Top View Picture**

DAMAGED WOOD PILE REPORT BENT 74 A

**BENT # 74
PILE: A**

**Damaged Area: Waterline
Type of Damage: Bio
Estimated Section Loss: 25%**

**DAMAGE:
H. 30"
W. 6-3/4"
D. 4-1/2"**



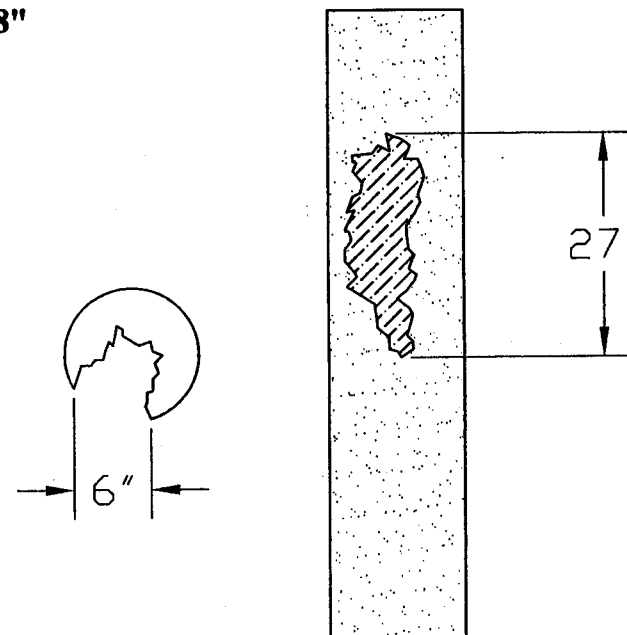
**NOTE: 12 O'clock Position looking Inshore
For Top View Picture**

DAMAGED WOOD PILE REPORT BENT 74 D

**BENT # 74
PILE: D**

**Damaged Area: Waterline
Type of Damage: Bio
Estimated Section Loss: 60%**

**DAMAGE:
H. 27"
W. 6"
D. 8"**



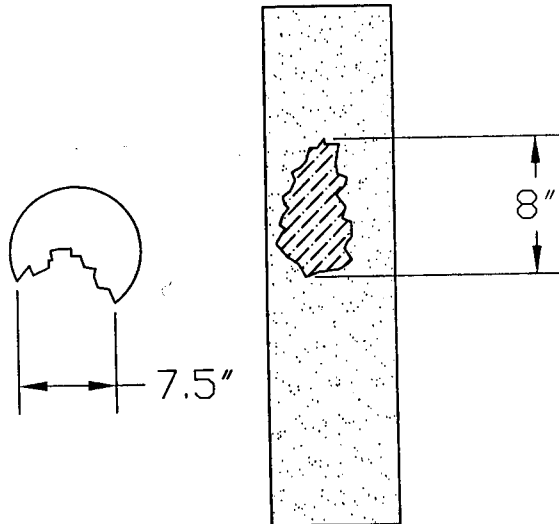
**NOTE: 12 O'clock Position looking Inshore
For Top View Picture**

DAMAGED WOOD PILE REPORT BENT 76 E

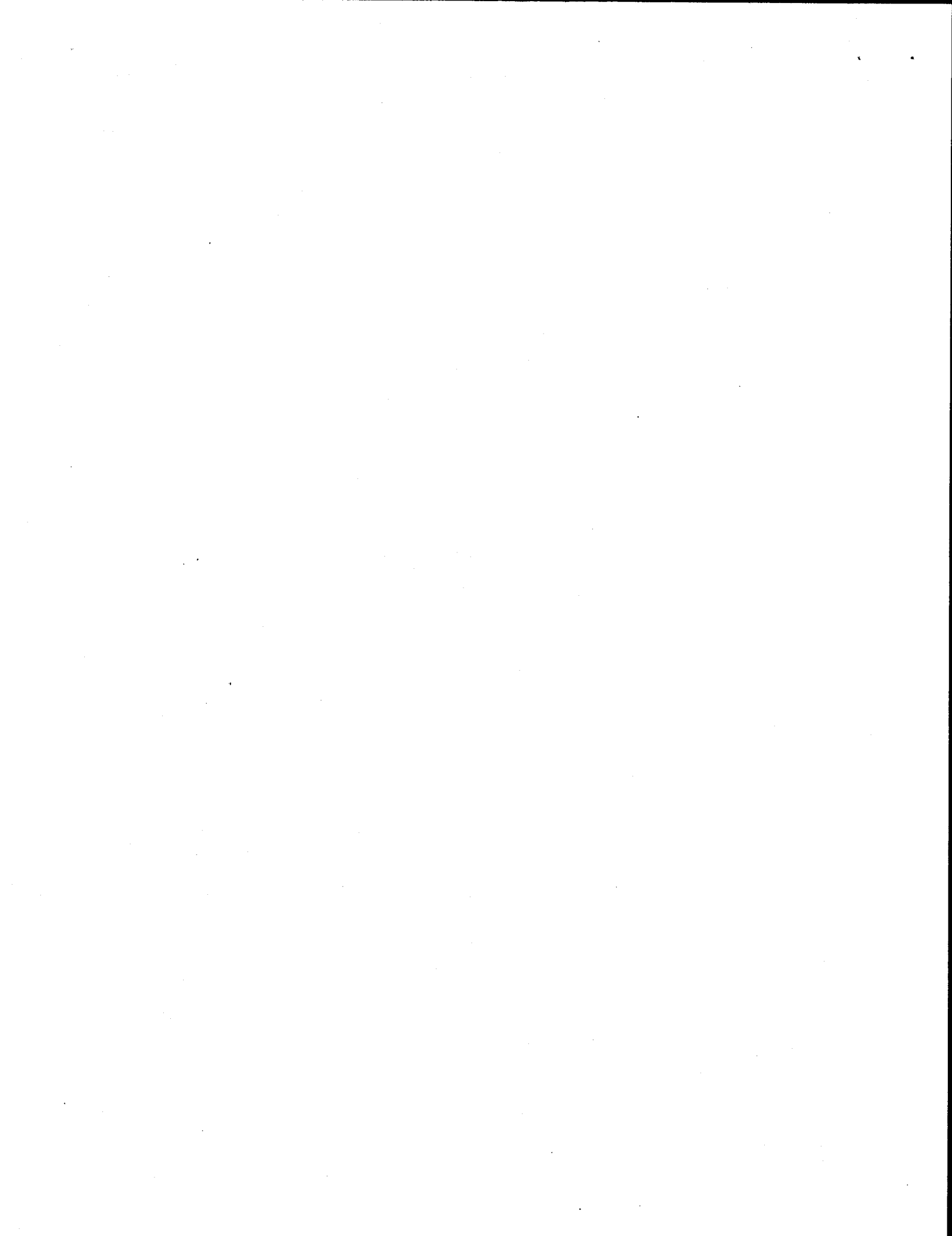
BENT # 76
PILE: E

Damaged Area: Waterline
Type of Damage: Bio
Estimated Section Loss: 50%

DAMAGE:
H. 8"
W. 7-1/2"
D. 6"



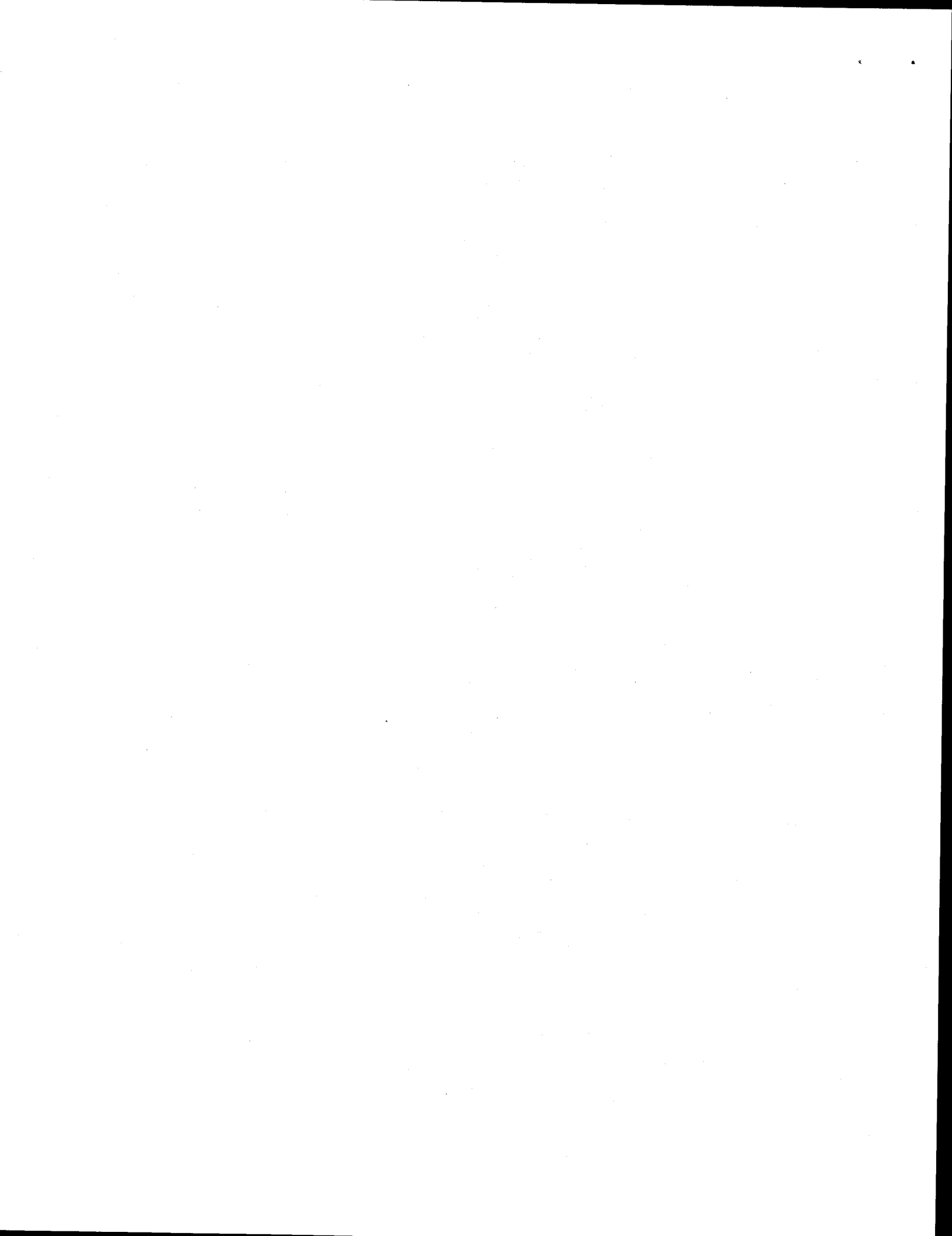
NOTE: 12 O'clock Position looking Inshore
For Top View Picture





Ventura Pier

EXHIBIT 4
4-04-126
PHOTOS (2 p.)





Visitor-serving
commercial area

Pilings storage area

Area of pier
subject to repair
(approximate)

