

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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Filed: 8/10/2006  
49th Day: 9/28/2006  
180th Day: 2/6/2007  
Staff: Charles Posner - LB  
Staff Report: 8/24/2006  
Hearing Date: September 13, 2006  
Commission Action:



# W17a

**STAFF REPORT: MATERIAL AMENDMENTS**

**APPLICATION NUMBERS:** 5-00-001-A1 & 5-98-328-A2

**APPLICANT:** Plinio Garcia      **AGENT:** Katja Perry

**PROJECT LOCATION:** 5414-5418 Pacific Avenue (Lot Nos. 19 & 20, Block 4, Del Rey Beach Tract), Venice, City of Los Angeles, Los Angeles County.

**LOCAL APPROVAL:** City of Los Angeles Right of Entry Permit, 7/27/2006.

**DESCRIPTION OF PREVIOUS ACTIONS:**

**Coastal Development Permit 5-98-328** was approved on September 16, 1999 for construction of a three-story single-family residence at 5414 Pacific Avenue (Lot 19). The house was not built, but the permit was amended in 2003 to allow a swimming pool and other accessory uses in conjunction with the house on Lot 20 (See below).

**Coastal Development Permit 5-00-001** was approved on February 15, 2000 for construction of a three-story single-family residence with attached three-car garage at 5418 Pacific Avenue (Lot 20). The house was completed in 2002.

**Coastal Development Permit Amendment 5-98-328-A1** was approved on November 10, 2003 tying Lot 19 together with Lot 20 and permitting Lot 19 to be developed with a swimming pool, spa, deck, fencing, perimeter wall and a three-car surface parking area, instead of the previously approved house.

**DESCRIPTION OF CURRENT AMENDMENT REQUESTS:**

Restore 25'x 80' portion of lagoon buffer with native vegetation adjacent to an existing single-family residence on the west bank of Ballona Lagoon.

**SUMMARY OF STAFF RECOMMENDATION**

The applicant is requesting these permit amendments as part of an agreement and stipulated judgment requiring him to resolve a violation. The violation occurred when unpermitted development (a glass wall, irrigation devices and non-native vegetation) was installed near the applicant's house within an eighty-foot long segment of the protective lagoon buffer strip that exists along the west bank of Ballona Lagoon (on the eastern portions of Lot Nos. 19 and 20 and within a City of Los Angeles right-of-way known as the Esplanade West). Staff is recommending that the Commission **APPROVE** the permit amendments for the proposed restoration project with special conditions to protect the sensitive habitat in Ballona Lagoon and along the west bank. The applicant agrees with the recommendation. **See Page Two for the motion to carry out the 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 amendments affect conditions required for the purpose of protecting a coastal resource. 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 requests with special conditions:

**MOTION I** *"I move that the Commission approve the proposed amendment to Coastal Development Permit 5-98-328 pursuant to the staff recommendation."*

**MOTION II** *"I move that the Commission approve the proposed amendment to Coastal Development Permit 5-00-001 pursuant to the staff recommendation."*

Staff recommends two **YES** votes. Passage of these motions will result in approval of the amendments and adoption of the following resolution and findings for each permit amendment. An affirmative vote by a majority of the Commissioners present is needed to pass each motion.

**I. Resolution for Approval of Permit Amendment**

The Commission hereby approves the coastal development permit amendment on the ground that the development as amended and 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 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 of the Permit Amendments**

**Note:** These permit amendments do not alter the underlying conditions of Coastal Development Permits 5-98-328 and 5-00-001.

1. Restoration Plan

The project site plan and the approved restoration plan are attached as Exhibit #4 of the staff report dated August 24, 2006. The approved restoration plan shall be implemented in conformance with the following requirements:

- A. Prior to the removal of non-native vegetation, a qualified biologist or restoration ecologist shall survey the project site and identify with flags all existing vegetation that is native to the banks of Ballona Lagoon. The native plants identified with flags shall not be disturbed and shall be preserved in place during the implementation of the approved restoration plan. Adequate water and care shall be provided in order to keep the existing native plants healthy.
- B. Under the supervision of a qualified biologist or restoration ecologist, all non-native plants shall be removed from the project site using only hand-held tools while taking care to avoid disturbance of native plants. No herbicides may be employed. No grading is permitted. No heavy machinery may be used. No dead plants shall be left on site and no persistent chemicals shall be employed.
- C. All vegetation planted on the site shall consist of native plants typically found in the dunes adjacent to the Ballona wetlands. As much as possible, the seeds and cuttings employed shall be from local sources adjacent to Ballona Lagoon, the Venice Canals, and the Ballona wetlands. Los Angeles and Orange County native plant nurseries and dunes may be used as alternative sources if the local sources cannot supply all of the necessary plant materials. Prior to the first planting cycle, the permittee shall provide the Executive Director with the quantities and sources of all plants used in the restoration project.
- D. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council (formerly the California Exotic Pest Plant Council), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized within the property.
- E. A silt fence shall be installed along the lagoon-side edge of the project area in order to prevent soil erosion and siltation in the lagoon.
- F. Revegetation shall commence as soon as possible following removal of non-native plants and preparation of the soil. The existing native vegetation and all required plantings shall be maintained in good growing condition throughout the life of the restoration project, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with the restoration plan. Revegetation activities may continue during the least tern-nesting season.

- G. Planting shall maintain views of the water from the public areas (e.g., Yawl Street).
- H. For at least five years following the initial planting, a qualified biologist or restoration ecologist shall actively monitor the site, remove non-natives and reinstall native plants that have failed. The qualified biologist or restoration ecologist shall monitor and inspect the site no less than once each thirty days during the first year that follows the initial planting. Within thirty days of the initial installation of the native plants, the permittee shall submit for the review and approval of the Executive Director, a written report prepared by a qualified biologist or restoration ecologist which documents the planting (with photographs) and includes a statement that the approved restoration plan has been implemented in accordance with the terms of the plan, and a description of the success of the plantings. On an annual basis (no later than December 31<sup>st</sup> of each year), for a period of five years, the permittee shall submit for the review and approval of the Executive Director, an annual written monitoring report prepared by a qualified biologist or restoration ecologist that documents the planting and evaluates the success of the native plants in relation to the approved success criteria. The annual monitoring report shall include photographic documentation of plant species and plant coverage. If the annual monitoring report indicates the restoration project is not in conformance with the approved restoration plan, or has failed to meet the success criteria specified in the approved restoration plan, the permittee shall submit a revised or supplemental restoration plan for the review and approval of the Executive Director. The revised or supplemental restoration plan must be prepared by a qualified biologist or restoration ecologist and shall specify the measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved restoration plan. The permittee shall implement the supplemental restoration plan approved by the Executive Director and/or seek another permit amendment if required by the Executive Director, and implement the development approved by the Commission.
- I. The temporary irrigation system shall be removed from the protective lagoon buffer strip within fifteen days of a certification by a qualified biologist or restoration ecologist and the Executive Director that that the restoration project conforms with the success criteria of the approved restoration plan and irrigation is no longer necessary for the success of the project.

Any proposed change in plans, or any other deviation from the approved development, shall be submitted for review by the Executive Director to determine whether another amendment to this coastal development permit is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations. If the Executive Director determines that an amendment is necessary, no changes shall be made until a permit amendment is approved by the Commission and issued by the Executive Director.

2. Lagoon Buffer

The protective lagoon buffer strip shall be maintained as an open space and natural habitat area, and it shall not be used in a manner that would in any way degrade the habitat value of the lagoon buffer.

3. Timing Condition

The permittee shall commence the implementation of the approved restoration plan within thirty days of Commission action on this coastal development permit amendment application, or within such time as the Executive Director may grant for good cause. The approved restoration plan shall be implemented in a diligent manner and shall be completed in conformance with the timing requirements set forth in the special conditions and the stipulated judgment entered in Harrison and Garcia v. California Coastal Commission, et al. (Los Angeles Superior Court Case No. BS096831). Failure to comply with this requirement may result in the institution of enforcement action under the provisions Chapter 9 of the Coastal Act.

### **III. Findings and Declarations**

The Commission hereby finds and declares:

#### **A. Project Description and Background**

The development proposed by the amendment applications is a restoration plan for the protective Ballona Lagoon buffer strip that abuts the applicant's single-family residence at 5418 Pacific Avenue (Lot Nos. 19 & 20) on the west bank of Ballona Lagoon in Venice (Exhibit #3). The proposed restoration area is situated about twenty feet inland of the high tide line of Ballona Lagoon. The proposed restoration plan, attached as Exhibit #4 of this staff report, calls for the replacement of all non-native plants with native plants within the 25'x 80' restoration area (Exhibit #4). The applicant has submitted the proposed restoration plan pursuant to the requirements of the stipulated judgment entered in Harrison and Garcia v. California Coastal Commission, et al. (Los Angeles Superior Court Case No. BS096831), in order to resolve a violation involving the applicant's installation of unpermitted development (a glass wall, irrigation system and non-native vegetation) within the protective Ballona Lagoon buffer strip.

The applicant's house on Lot 20 (built in 2002) was authorized pursuant to the Commission's February 15, 2000 approval of Coastal Development Permit 5-00-001. Coastal Development Permit 5-00-001 included the permittee's offer to dedicate a fifteen-foot deep easement on the eastern (lagoon side) portion of the property for public access and habitat protection [Los Angeles County Instrument No. 01-0385011]. This easement on a portion of Lot 20 has been accepted by the City of Los Angeles and is part of the protective Ballona Lagoon buffer strip that the applicant is proposing to restore with native vegetation.

A similar easement exists on the eastern end of Lot 19 [Los Angeles County Instrument No. 00-0480604] as a result of the permittee's offer to dedicate such easement as part of Coastal Development Permit 5-98-328. Coastal Development Permit 5-98-328 was approved on September 16, 1999 for the construction of a three-story single-family residence at 5414 Pacific Avenue (Lot 19), but the house was not built. The current applicant purchased Lot 19 and was granted Coastal Development Permit Amendment 5-98-328-A1 on November 10, 2003 to tie Lot 19 together with Lot 20 in order to develop Lot 19 with a swimming pool, spa, deck, fencing, perimeter wall and a three-car surface parking area, instead of the previously approved house.

The violation occurred after November 10, 2003 when the Commission granted the applicant Coastal Development Permit Amendment 5-98-328-A1 for the installation of the swimming pool and other improvements on Lot 19. Unpermitted development, in the form of non-native plants, irrigation devices and a glass wall, were installed within the City-held easements on the eastern ends of Lot Nos. 19 and 20 and within the abutting Esplanade West right-of-way. The applicant has agreed to resolve the violation and restore the protective Ballona Lagoon buffer strip where the violation occurred. The applicant recently removed the glass wall from the lagoon buffer strip. The City of Los Angeles has granted the applicant its permission to undertake the proposed restoration project within the eighty-foot long segment of the City right-of-way (Esplanade West) and on the City-held easements that abut the eastern ends of Lot Nos. 19 and 20 (Exhibit #4, p.1).

## **B. Ballona Lagoon and the Buffer Strip**

Ballona Lagoon is located in the Silver Strand/Marina Peninsula area of Venice in the City of Los Angeles, adjacent to the Marina del Rey entrance channel (Exhibit #2). The lagoon is an artificially confined tidal slough connecting the Venice Canals to the Pacific Ocean via the Marina del Rey harbor entrance channel and County-controlled tidal gates. The lagoon is 150-200 feet wide and contains approximately sixteen acres of open water and wetland area. The waterway is a critical foraging habitat area for the California least tern and many other species. The banks of the lagoon are remnants of coastal sand dunes, and the native vegetation consists of coastal dune plants on the lagoon bank, with wetland plants near the water. Beds of (non-native) ice plant cover large sections of the west bank.

The certified Venice Land Use Plan (LUP) designates the 4,000-foot long lagoon and its lower banks as an Environmentally Sensitive Habitat Area (Exhibit #2: ESHA). The certified Venice LUP refers to the lagoon buffer as the "Habitat Protection Buffer Strip" (Exhibit #2). A minimum 25-foot wide protective lagoon buffer strip (typically composed of a fifteen-foot wide easement on each lot plus the ten-foot wide Esplanade West right-of-way) is necessary to preserve Environmentally Sensitive Habitat Area (ESHA) that exists in and along the banks of Ballona Lagoon, to protect the ESHA from the impacts of development, and to maximize the airspace for the bird flyway and visual cone over Ballona Lagoon and its banks.

Ballona Lagoon is surrounded by a highly urbanized area of single-family and multiple-family residential development. The properties along the east and west banks of the lagoon are developed with single-family residences and a few duplexes. Each structure is set back at least 25 feet from the waters of the lagoon. On the east bank of the lagoon, a forty-foot wide protective lagoon buffer strip, required by Coastal Development Permit A-266-77 (ILA), separates the private residential development from the waters of the lagoon. An undeveloped City right-of-way (Esplanade East) comprises part of the forty-foot wide lagoon buffer on the east bank. An improved public access trail with fencing runs along the entire east bank of Ballona Lagoon, within the east bank lagoon buffer strip.

A similar but narrower protective lagoon buffer strip exists on the west bank, where the proposed project is located. As it does on the east bank, the undeveloped City right-of-way (Esplanade West) comprises part of the protective lagoon buffer strip where it exists on the west bank, except in the eroded areas where it is submerged and is part of the water area of the lagoon. South of Topsail Street, there are 25 privately owned lots on the west bank,

including the applicant's. There is no public path south of Topsail Street along the west bank, although there is a City sidewalk on the west side of Pacific Avenue.

Twenty-two of the 25 privately owned lots on the west bank have already been developed with Commission-approved residences. When approving the coastal development permits for the construction of the residences on the west bank of the lagoon, the Commission requires the provision of a minimum 25-foot wide protective lagoon buffer strip between the water and the private development (typically composed of a fifteen-foot wide easement on each lot plus the ten-foot wide Esplanade West right-of-way) in order to ensure that adequate area exists for habitat protection and a potential future west bank public access trail. The restoration of the protective lagoon buffer strip in front of the applicant's house is the subject of these permit amendments.

### **C. Marine Resources and Environmentally Sensitive Habitat**

The Commission's responsibility to protect Ballona Lagoon is established by the habitat protection policies of the Coastal Act. These Coastal Act policies are also incorporated into the certified Venice LUP.

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.

In addition, the wetland protection policies of the Coastal Act require the protection of the biological productivity of wetland areas.

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 development proposed by the amendment applications is a restoration plan for the protective Ballona Lagoon buffer strip that abuts the applicant's single-family residence. The proposed restoration plan, attached as Exhibit #4 of this staff report, calls for the replacement of all non-native plants with native plants within the 25'x 80' restoration area (Exhibit #4). The proposed restoration area is situated about twenty feet inland of the high tide line of Ballona Lagoon, so it does not include any work in the wetland. No permanent development is proposed, and the restoration project is consistent with the certified Venice LUP and Coastal Act requirements to maintain the lagoon buffer as an open space and natural habitat area.

Section 30240 of the Coastal Act requires that environmentally sensitive habitat areas be protected and development in areas adjacent to environmentally sensitive habitat areas shall not degrade such areas and shall be compatible with the continuance of such habitat areas. The special conditions ensure the continuance of the habitat by requiring that any existing native plants be preserved on the site, and that only native plants found in the dunes of the Ballona Wetlands area be installed as part of the restoration area. All non-native plants will be removed, as they do not support the natural ecosystem. The proposed protection and installation of native plants will restore the site to a more natural condition and help to enhance the ecosystem of Ballona Lagoon. The special conditions also require that the restoration project be monitored for five years to ensure that it is successfully completed. Therefore, the proposed restoration project, as conditioned to protect the sensitive resources, complies with the requirements of Section 30240 of the Coastal Act.

Sections 30230 and 30231 of the Coastal Act require that marine resources and water quality be protected and restored. Erosion, siltation and degradation of water quality will be prevented because no grading or heavy machinery shall be used in the restoration project, and a silt fence shall be installed along the lagoon-side of the restoration area. Therefore, the disturbance of the project site will be minimal. Also no herbicides or other persistent chemicals shall be employed. Therefore, the special conditions of these permit amendments ensure that the proposed restoration project conforms to the requirements of Sections 30230 and 30231. Therefore, as conditioned, the permit amendments and proposed development are consistent with the ESHA, marine resource and water quality policies of the Coastal Act.

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

No development is being proposed that would interfere with public access to or along the water's edge. Therefore, as conditioned, the permit amendments and proposed development will not have any new adverse impact on public access to the coast or to nearby recreational facilities. Thus, as conditioned, the permit amendments and proposed development conform with Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act.

#### **E. Unpermitted Development**



Development has occurred on site without the required coastal development permits and in non-compliance with the terms and conditions of previously issued coastal permits including, but not limited to, a glass wall, irrigation devices and non-native residential landscaping situated within the habitat and public access easements and City right-of-way that comprise part of the protective lagoon buffer strip. The proposed project includes the removal of all unpermitted development from within the segment of City right-of-way in front of the applicant's property, and from the City-held easements on the applicant's private property, and revegetation of the restoration site with native vegetation (Exhibit #4).

To ensure that the unpermitted development component of this application is resolved in a timely manner, Special Condition Three requires that the applicant commence the approved restoration project within thirty days of Commission action. The approved restoration plan shall also be implemented in a diligent manner and shall be completed in conformance with the timing requirements set forth in the special conditions and the stipulated judgment. The Executive Director may grant additional time for good cause.

Although unpermitted development has occurred, consideration of the application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Approval of these permit amendments does not constitute a waiver of any legal action with regard to any alleged violations nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal development permit.

#### **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 Commission on June 14, 2001 officially certified the Venice LUP. As conditioned, the permit amendments and proposed development conform with the policies of the certified Venice LUP. As conditioned, the permit amendments and proposed development are also consistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the permit amendments, as conditioned, will not prejudice the City's ability to

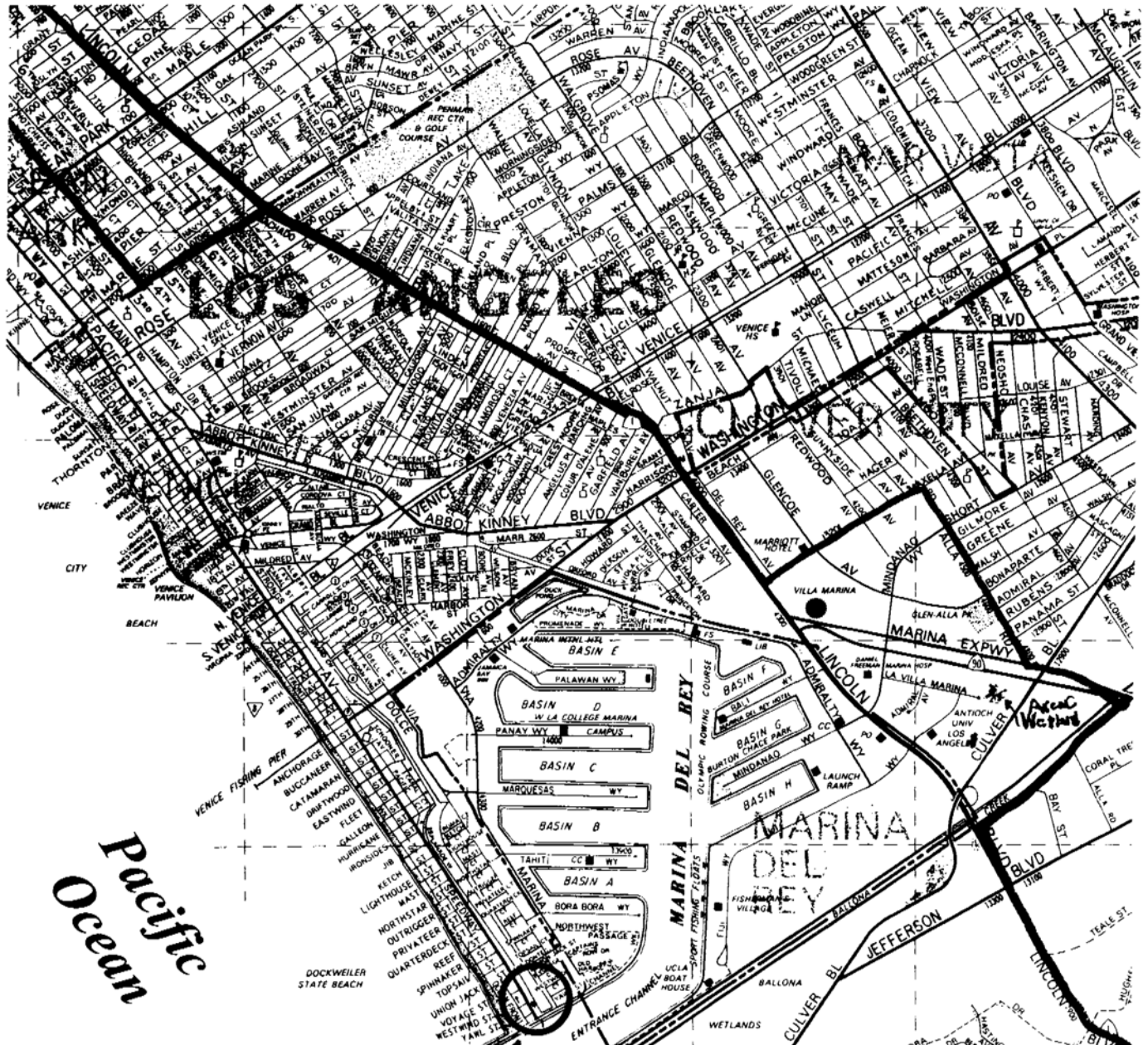
prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

**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.

As conditioned, the permit amendments and proposed development are 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 as conditioned can be found consistent with the requirements of the Coastal Act to conform to CEQA.

# VENICE, CA



Pacific  
Ocean

North

Site: 5414-5418  
Pacific Avenue

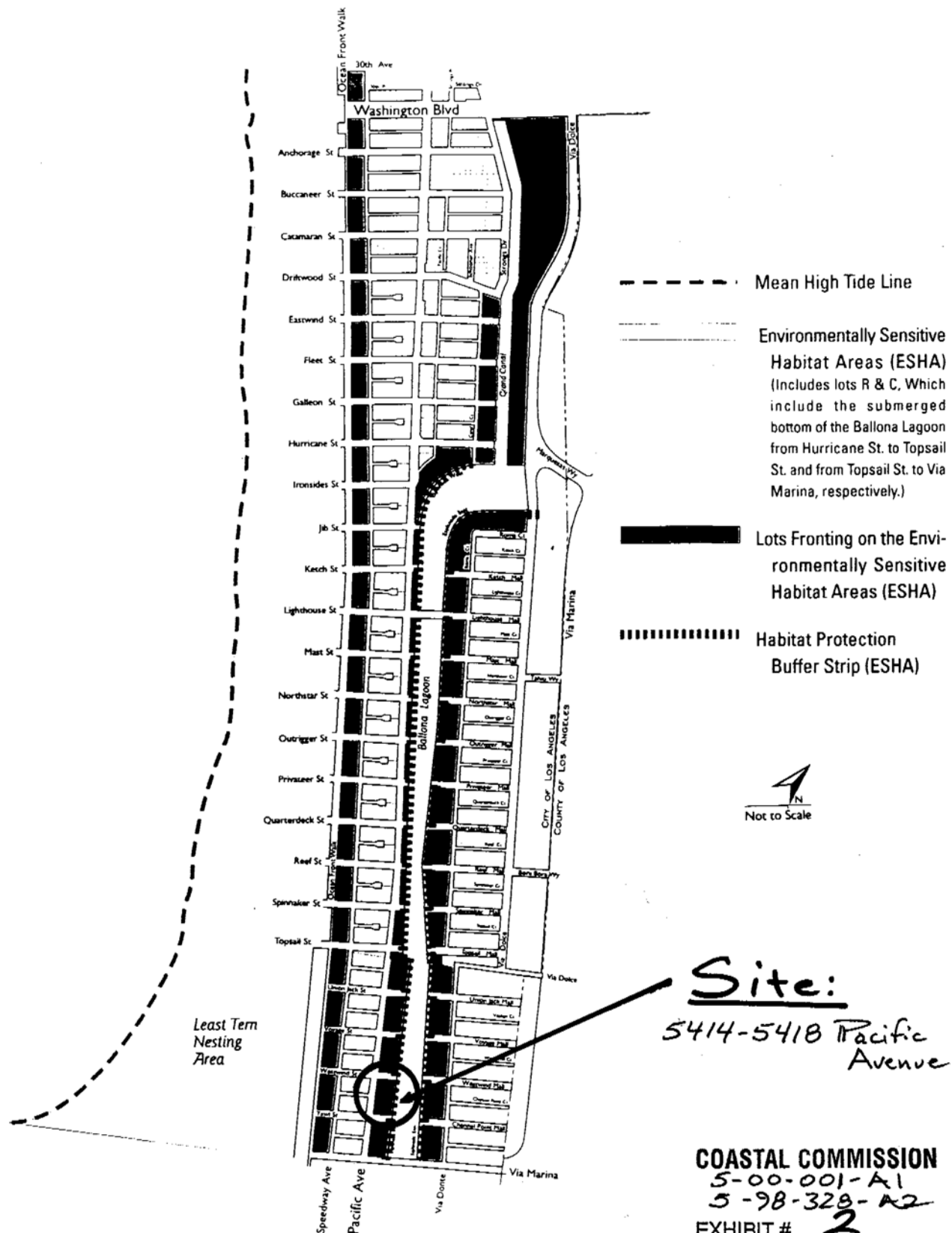
COASTAL COMMISSION

5-00-001-A1

5-98-328-A2

EXHIBIT # 1

PAGE 1 OF 1



**LUP**  
**Exhibit 22c**

## Environmentally Sensitive Habitat Areas

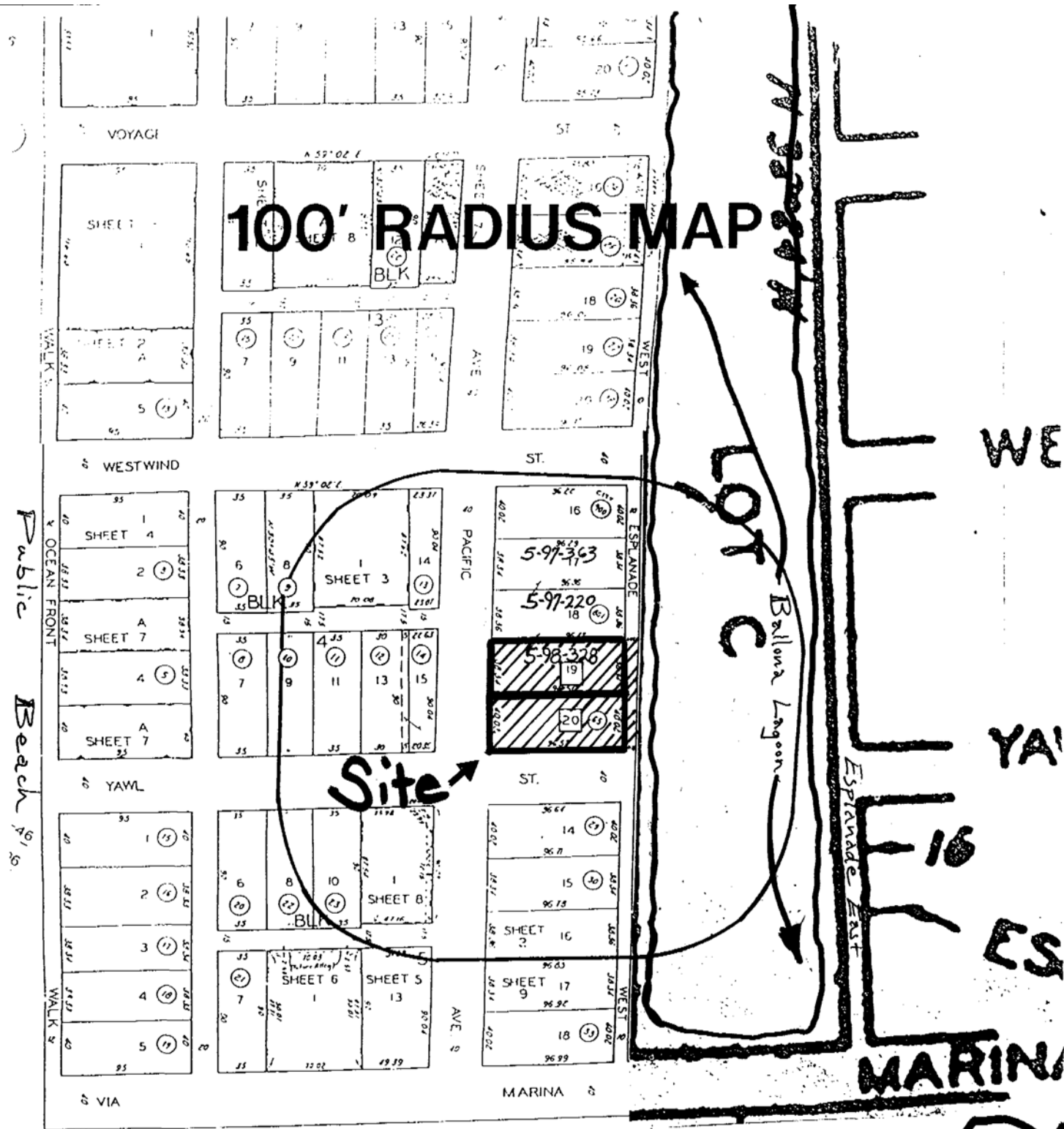
**COASTAL COMMISSION**

5-00-001-A1

5-98-328-A2

EXHIBIT # 2

PAGE 1 OF 1



Marina del Rey  
Entrance Channel

Lot 19  
Lot 20 Block 4  
COASTAL COMMISSION  
5-00-001-A1  
5-98-328-A2  
EXHIBIT # 3  
PAGE 1 OF 1

North

L. + 19  
5414 Pacific Avenue

Pool

Yawl  
Street  
(Public  
Parking)

Private Yard

# Element for Habitat Restoration

← Esplanade West →  
Rt-of-way

EXISTING NON-NATIVE PLANTINGS  
OF LITORION PEREZII (LP) AND NON-NATIVE GRASSES  
WITH NATIVE ARTEMISIA, BUCKWHEATS AND NATIVE WILDTLOWERS  
RATIO: 30% NATIVES - 70% NON-NATIVE PLANTS

Ballona Lagoon

## Existing Conditions

**KATJA PERREY  
LANDSCAPES**

FROM CLARK ST. WALK ON BRIDGE. WWW.COURTESY-CLARKST.COM P. 200-746-2222 P. 200-746-2222

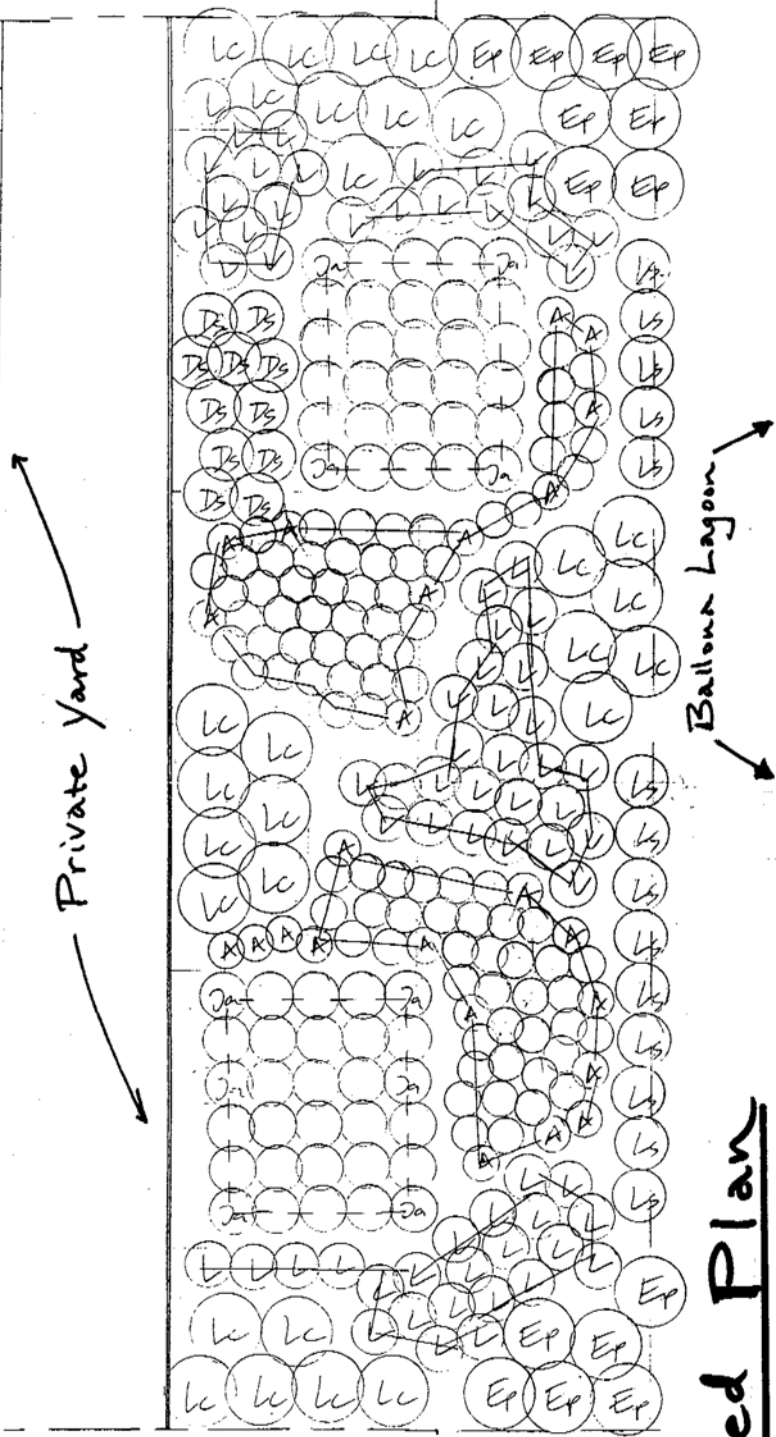
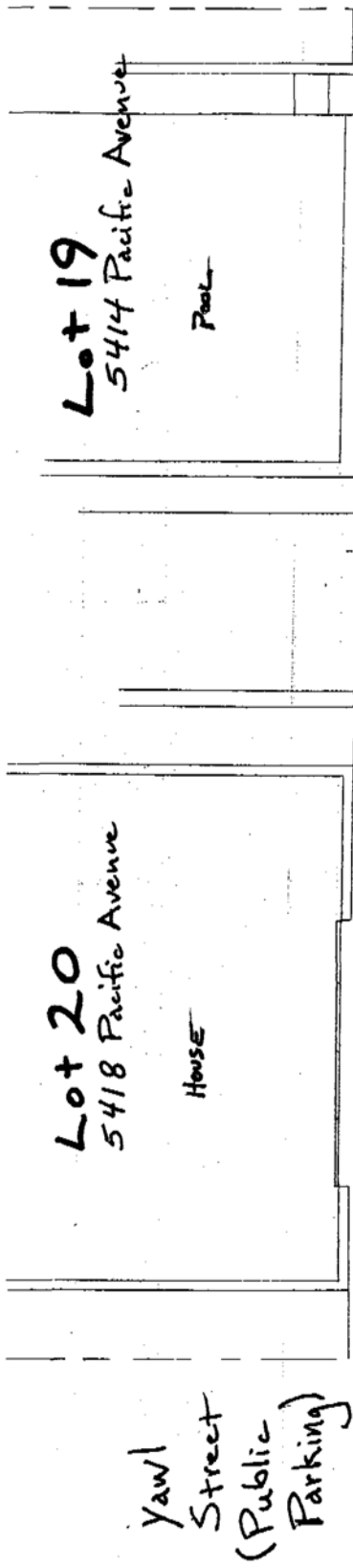
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6414 S 6418 PACIFIC AVENUE, MARINA DEL REY, CA 90292

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**WITH RELOCATED MEMBERS**

COASTAL COMMISSION  
5-00-001-A1  
5-98-328-A2  
EXHIBIT # 4  
PAGE 1 OF 3



# Proposed Plan

Symb Botanical Name	Common Name	Height	Width	Quantity	Size
A Achillea millefolium	White Yarrow	1-2'	2-3'	115	1 g.
DS Distichlis spicata	Saltgrass	<1'	3'+	11	1 g.
EP Eriogonum pinnatifidum	Coast Buckwheat	1-2'	4'+	14	1 g.
JA Juniperus acutis	Spike Rush	2'	2'+	60	1 g.
L Limonium californicum	Coastal Statice	1'	2'+	60	1 g.
LS Lotus scoparius	Deerweed	2-3'	3'	14	1 g.
LC Lupinus chamissonis	Dune Lupine	3-5'	4'	28	1 g.

#### Methods for Removal of Existing Plantings and Installation of Native Plantings:

- removal of all existing plantings: Palm trees, shrubs, perennials, grasses and annuals with shovels
- removal of existing irrigation (cap all pipes, the area will be hand watered)
- removal of existing lawn including roots and removal of an extra 2 inches of dirt to remove possible seed bank
- rotor-tilling of the entire area to prepare soil for planting
- hand-watering of the entire area for one week to insure that seed bank has been removed (weeding of newly sprouted weeds)
- installation of weed cloth/ landscape fabric for the entire area (to prevent weed growth)
- planting of native plants
- application of gravel mulch for the entire area:
  - 2 inches thick (to be effective as soil cover),
  - 6 inches away from trunk/base of newly planted plants (to prevent root rot)(Gravel mulch is used to insure cooling of soil, to prevent evaporation, weed growth and soil migration and to insure soil stabilization. Gravel used as mulch also does not to decompose into organic matter and change the soil composition)

#### Description of Temporary Watering Methods/ Watering Times of Native Planting:

After the removal of existing permanent irrigation (all pipes are being capped) the area will be hand watered with garden hoses:

- with spray attachments for soft, 'rain-like' spray for fields of Achillea, Distictillis, Juncus, Limonium and Lupinus
- Lotus and Eriogonum will be watered next to the base/trunk of plant with a straight spray

For the first two years the plants should be watered often enough so that the root ball of the plants won't dry out:

- first three months possibly 2-3 times a week
- following 9 months possibly 1-2 times a week
- second year after planting possibly once a week, to be determined at visit for annual report

#### Success Criteria of Native Planting for Annual Reports:

The area restored with 100% native plants of Southern California coastal habitat will be viewed annually and a report will be written to the following criteria:

- 80% coverage of the planted area should be covered with native plants on the plant list
- description of resistance of or possible invasion of non native plants to the area: the invasion should be demonstrated by less than 25% of weed species

#### Soil Stabilization Methods:

The area to be planted is flat and situated on the upper part of a small hill bordering a decline into a channel in Marina Del Rey.

The soil stabilization method proposed is gravel mulch. Gravel mulch is used to insure cooling of soil, to prevent evaporation and weed growth as well as to prevent soil migration and to insure soil stabilization.

Gravel used as mulch also does not to decompose into organic matter and change the soil composition.

#### Timetables of Installation:

- removal of un-permitted development (fence, lawn and plantings) 30 days of permit amendment. The fence was relocated in November of 2005 (see photos).
- planting to start within 15 days thereafter and to be completed within 30 days

COASTAL COMMISSION

5-00-001-A1  
5-98-328-A1

EXHIBIT # 4  
PAGE 3 OF 3