

CALIFORNIA COASTAL COMMISSION

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**STAFF REPORT: REGULAR CALENDAR**

APPLICATION NO.: 4-06-137

APPLICANT: Los Angeles County Department of Public Works

PROJECT LOCATION: Las Flores Canyon Road 130 feet south of Mile Marker 0.30, Santa Monica Mountains, Los Angeles County

PROJECT DESCRIPTION: Repair of road embankment above a creek by excavating and benching approximately 250 sq.ft. section of roadside slope, placement of geotextile filter fabric and 17 cu.yds. of rock rip-rap that is incorporated with willow plantings, revegetation of disturbed embankment area, and reconstruction of asphalt road shoulder.

LOCAL APPROVALS RECEIVED: N/A

SUBSTANTIVE FILE DOCUMENTS: "Biological Reconnaissance Survey Results for the Las Flores Canyon Road Repair Project, 130 feet south of Mile Marker 0.30" prepared by URS Corporation, dated January 18, 2006; California Department of Fish and Game letter regarding Streambed Alteration Agreement Notification No. 1600-2007-0417-R5, stating proposed project may proceed without an agreement, dated February 6, 2008.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends **approval** of the proposed development with four (4) special conditions regarding riparian woodland habitat mitigation and restoration, native tree protection and monitoring, assumption of risk, and construction timing and best management practices. The proposed project is located along Las Flores Canyon Road, 130 feet south of Mile Marker 0.30 in the Santa Monica Mountains of Los Angeles County. The project is located along a 60 foot long section of road and embankment that descends approximately 10 feet to an unnamed ephemeral drainage. During the January 2005 winter storm season, the roadway embankment slope along this 60 foot long section of Las Flores Canyon Road was subject to significant erosion as a result of increased amounts of stormwater runoff. The County proposes to repair the road embankment above the drainage by excavating (10 cu. yds.) and benching approximately 250 sq. ft. of roadside slope and placement of geotextile filter fabric, 36 cu. yds. of fill, and 17 cu. yds. of rock rip-rap that is incorporated with willow plantings. The County proposes revegetation of the disturbed embankment area and reconstruction of the asphalt road shoulder in the project area. No work will be conducted within the drainage, as all work is proposed at least 2 feet above the drainage. The purpose of this project is to prevent further

erosion and undermining of the roadway in future winter storm seasons. The applicants have determined that the proposed project to remediate the eroding slope is necessary in order to ensure the continued stability of the slope supporting Las Flores Canyon Road and to maintain the public's ability to use this road for vehicular access and emergency services/access to nearby developed residential communities.

Although this remediation project is a repair and maintenance project of the sort described in the Commission's 1978 Repair and Maintenance Guidelines, it is located within an area containing riparian woodland habitat that is considered environmentally sensitive habitat area (ESHA), and on private property located outside the roadway prism, and, thus, requires a coastal development permit. The standard of review for the coastal permit is consistency with the Chapter 3 policies of the Coastal Act. In addition, the policies of the certified Malibu – Santa Monica Mountains Land Use Plan (LUP) serve as guidance. The proposed project, as conditioned, is consistent with the applicable resource protection provisions of the Coastal Act.

I. STAFF RECOMMENDATION

MOTION: ***I move that the Commission approve Coastal Development Permit No. 4-06-137 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 Permit:

The Commission hereby approves a 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 permit 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 must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any 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. Riparian Woodland Mitigation and Restoration Plan

Prior to issuance of the Coastal Development Permit, the applicant shall submit, for the review and approval of the Executive Director, a detailed Riparian Woodland Habitat Restoration Plan and Monitoring Program, prepared by a biologist or environmental resource specialist with qualifications acceptable to the Executive Director, for all areas of the project site temporarily disturbed by grading and construction activities and/or permanently displaced. Within 60 days of the issuance of this coastal development permit, the applicant shall commence implementation of the approved Restoration Plan. The Executive Director may grant additional time for good cause. The plan shall identify the species, extent, and location of all plant materials to be removed or planted and shall incorporate the following criteria:

a. Restoration Plan Technical Specifications

The Restoration Plan shall provide for the following:

- 1) Revegetation for areas of the project site temporarily disturbed by grading and construction activities with native plant species appropriate for riparian woodland habitat. Revegetation shall be implemented using a mixture of both container and seed plantings.
- 2) The plan shall include the proposed incorporation of willow plantings among the riprap, in which geotextile filter fabric with holes for willow plantings is placed on the graded slope prior to rock placement to stabilize the soil and live willow stakes are inserted among the voids (making sure the stakes penetrate the fabric filter and underlying soil). Interstitial spaces in the rip rap shall be partially filled with a fine gravel, sand, and soil combination and planted with native plant species appropriate for riparian woodland habitat.

- 3) Restoration of riparian woodland habitat (at a ratio of 3:1 or greater) as mitigation for all areas permanently displaced as a result of the project (the approximately 200 sq. ft. area of proposed riprap). The restoration may be implemented on the project site if appropriate area exists, or alternatively, the restoration may be implemented off-site on property owned by the Mountains Restoration Trust (MRT), or other appropriate entity, subject to the review and approval of the Executive Director. The restoration area shall be delineated on a site plan and shall be located in the same vicinity of the project site within the coastal zone of the Santa Monica Mountains. All invasive and non-native plant species shall be removed from the restoration area. The restoration plan for off-site mitigation shall be prepared in consultation with the MRT.

The plan shall include detailed documentation of conditions on site prior to the approved revegetation activity (including photographs taken from pre-designated sites annotated to a copy of the site plans) and specify restoration goals and specific performance standards to judge the success of the restoration effort. The plan shall also provide information on removal methods for exotic species, salvage of existing vegetation, revegetation methods and vegetation maintenance. The plan shall further include details regarding the types, sizes, and location of plants to be placed within the mitigation area. Revegetation shall be implemented using a mixture of both container and seed plantings. Only native plant species appropriate for a riparian woodland habitat and which are endemic to the Santa Monica Mountains shall be used, as listed by the California Native Plant Society - Santa Monica Mountains Chapter in their document entitled Recommended List of Native Plants for Landscaping in the Santa Monica Mountains, updated August 2007. All native plant species shall be of local genetic stock. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or 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 or maintained within the property. Site restoration shall be deemed successful if the revegetation of native plant species on site is adequate to provide 90% coverage by the end of the five (5) year monitoring period and is able to survive without additional outside inputs, such as supplemental irrigation. The plan shall also include a detailed description of the process, materials, and methods to be used to meet the approved goals and performance standards and specify the preferable time of year to carry out restoration activities and describe the interim supplemental watering requirements that will be necessary.

b. Monitoring Program

A monitoring program shall be implemented to monitor the project for compliance with the specified guidelines and performance standards. The applicant shall submit, upon completion of the initial planting, a written report prepared by a qualified resource specialist, for the review and approval of the Executive Director, documenting the completion of the initial planting/revegetation work. This report shall also include

photographs taken from pre-designated sites (annotated to a copy of the site plans) documenting the completion of the initial planting/revegetation work.

Five years from the date of issuance of this coastal development permit, the applicant shall submit for the review and approval of the Executive Director, a Riparian Woodland Habitat Restoration Monitoring Report, prepared by a qualified biologist or Resource Specialist, that certifies whether the on-site restoration is in conformance with the restoration plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the monitoring report indicates the vegetation and restoration is not in conformance with or has failed to meet the performance standards specified in the restoration plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental restoration plan for the review and approval of the Executive Director and shall implement the approved version of the plan. The revised restoration plan must be prepared by a qualified biologist or Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

2. Assumption of Risk

- A. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from erosion, flooding, and slope failure; (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.
- B. ***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, incorporating all of the above terms of this condition.

3. Native Tree Protection and Monitoring

To ensure that native trees located in the vicinity of the proposed project (oak and walnut trees) are protected during grading and construction activities, protective barrier fencing shall be installed around the drip line of all native trees during construction operations.

Prior to commencement of construction, the permittee shall retain the services of a biological consultant or arborist with appropriate qualifications acceptable to the

Executive Director. The biological consultant or arborist shall be present on site during grading and construction activities. The biological consultant or arborist shall immediately notify the Executive Director if unpermitted activities occur or if native trees are removed or impacted beyond the scope of the work allowed by Coastal Development Permit 4-06-137. This biological consultant or arborist shall have the authority to require the applicant to cease work should any breach in permit compliance occur, or if any unforeseen sensitive habitat issues arise. Should any native trees be lost or adversely impacted as a result of this project, the permittee shall provide the planting of replacement trees, at a ratio of 10 replacement trees for the one damaged or removed tree, as mitigation. The applicant shall submit, for the review and approval of the Executive Director, an off-site native tree replacement planting program, prepared by a qualified biologist, arborist, or other qualified resource specialist, which specifies replacement tree locations, planting specifications, and a monitoring program to ensure that the replacement planting program is successful. Replacement trees shall be provided at a rate of 10:1.

4. Construction Timing and Best Management Practices

The permittee shall comply with the following construction-related requirements:

- a. Excavation and grading work shall take place only during the dry season (April 1 – October 31). This period may be extended for a limited period of time if the situation warrants such a limited extension, if approved by the Executive Director.
- b. No construction equipment, materials, debris, or waste shall be placed or stored where it may encroach into the drainage or be subject to erosion and dispersion.
- c. Prior to commencement of any work approved by this permit, the work area shall be flagged to identify limits of construction and identify natural areas off limits to construction traffic. All temporary flagging, staking, and fencing shall be removed upon completion of the project.
- d. Construction debris and sediment shall be removed from work areas each day that construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters.
- e. Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity.
- f. All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description and Background

The proposed project is located along Las Flores Canyon Road, 130 feet south of Mile Marker 0.30 in the Santa Monica Mountains of Los Angeles County (**Exhibit 1**). The project is located along a 60 foot long section of road and embankment that descends approximately 10 feet to an unnamed ephemeral drainage. The County proposes to repair the road embankment above the drainage by excavating (10 cu. yds.) and benching approximately 250 sq. ft. of roadside slope and placement of geotextile filter fabric, 36 cu. yds. of fill, and 17 cu. yds. of rock rip-rap that is incorporated with willow plantings. The County proposes revegetation of the disturbed embankment area and reconstruction of the asphalt road shoulder in the project area (**Exhibit 2**). No work will be conducted within the drainage, as all work is proposed at least 2 feet above the drainage. During the January 2005 winter storm season, the roadway embankment slope along this 60 foot long section of Las Flores Canyon Road was subject to significant erosion as a result of increased amounts of stormwater runoff (**Exhibit 3**). The purpose of this project is to prevent further erosion and undermining of the roadway in future winter storm seasons.

According to the applicant's submitted biological reconnaissance survey by URS Corporation, the project site is located on a steep roadside embankment that is dominated by plant species that are characteristic of a riparian woodland vegetation community. Several mature native oak and walnut trees are located in the vicinity, however, the mature oak and walnut trees are a sufficient distance away from the proposed work area that their removal or encroachment is not anticipated to be necessary. The applicant proposes to flag the trees during construction to ensure that they are avoided.

The proposed project site is situated within the "Lost Horizons" Small Lot Subdivision, an area containing dense residential development (**Exhibit 4**). A portion of the proposed project is located outside of the public road right-of-way and on private property (Assessor Parcel Number 4453-004-033) that is developed with a single-family residence. The owner of the subject property, Robert Mosier, has authorized Los Angeles County permission to complete the proposed project on his property.

The County has submitted an engineering and alternatives analysis for the proposed project, which indicates that installation of rock riprap within the benched embankment slope is necessary to anchor/support the reconstructed slope and to provide long-term slope stability during future storm events. Without the placement of riprap, the repaired roadside slope could fail in future storm events. However, the installation of the proposed 17 cubic yards of rip rap over a 200 sq. ft. area along the benched road embankment will result in the permanent loss of some riparian woodland habitat area on site. The submitted analysis identifies other alternatives to the proposed use of rip rap to support the reconstructed slope including the construction of a vertical geogrid

retaining wall, the construction of a less steep reconstructed slope that is revegetated, or excavate, backfill and spray shotcrete over the compacted slope. Staff has reviewed the submitted alternatives analysis and concurs with the County that the three identified alternative repair strategies are either considered infeasible or not environmentally preferable to the proposed project because they would result in greater adverse impacts to sensitive habitat than the proposed project itself.

Coastal Permit Required for Repair and Maintenance within ESHA

The proposed work is designed to maintain the existing road in a safe condition. The project constitutes repair and maintenance work. The Commission has expressly recognized, since 1978, certain types of repair and maintenance work related to roads as exempt from permit requirements pursuant to Section 13252 of the Commission's regulations and Section 30610(d) of the Public Resource Code. See California Public Resources Code ("PRC") Section 30610(d) and the "Repair, Maintenance and Utility Hook-Up Exclusions From Permit Requirements" (adopted by the Commission on Sept. 5, 1978) (hereafter, "R&M Exclusions") Appendix I, § 3 (referring to "installation of slope protection devices, minor drainage facilities"). However, the exemptions provided by the above referenced sections and the R&M Exclusions are limited. Accordingly, California Code of Regulations, Title 14 ("14 CCR"), Section 13252 (a) lists extraordinary methods of repair and maintenance that do still require a permit. Among those methods is any repair or maintenance "located in an environmentally sensitive habitat area." 14 CCR § 13252(a)(3). Since this project would occur within such an area, the method by which this project is conducted is not exempt, and a permit is required. In addition, further review of the R&M Exclusions Guidelines confirms that this proposed repair and maintenance is not exempt from permit requirements based on that document because the proposed development is located outside the "roadway prism" or the roadway property or easement.

Similarly, 14 CCR Section 13252(a) states that "activities specifically described in the [R&M Exclusions guidance document that] that will have a risk of substantial adverse impact on . . . environmentally sensitive habitat area" are not exempt based on that document and may require a coastal development permit, pursuant to the normal application of Section 13252. Thus, in this case, although the project is a repair and maintenance project, since the work is to be performed within an ESHA, Section 13252(a)'s limits on the repair and maintenance exemption do apply, and this project does require a permit to ensure that the method employed is as consistent as possible with the Chapter 3 policies of the Coastal Act. Moreover, this project involves excavation, and the R&M Exclusions guidance document expressly states that a permit is required "for excavation . . . outside of the roadway prism" Id. at § II.A., page 2. Therefore, a coastal development permit is required for this project.

B. Environmentally Sensitive Habitat and Water Quality

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 30240 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.

Section 30107.5 of the Coastal Act, defines an environmentally sensitive area as:

"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Section 30231 of the Coastal Act requires that the biological productivity and the quality of coastal waters and streams be maintained and, where feasible, restored through among other means, minimizing adverse effects of waste water discharge and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flows, maintaining natural buffer areas that protect riparian habitats, and minimizing alteration of natural streams. In addition, Section 30240 of the Coastal Act states that environmentally sensitive habitat areas must be protected against disruption of habitat values.

In addition, the Malibu/Santa Monica Mountains LUP provides policy guidance regarding the protection of environmentally sensitive habitats. The Coastal Commission has applied the following relevant policies as guidance in the review of development proposals in the Santa Monica Mountains.

P57 Designate the following areas as Environmentally Sensitive Habitat Areas (ESHAs): (a) those shown on the Sensitive Environmental Resources Map (Figure 6), and (b) any undesignated areas which meet the criteria and which are identified through the biotic review process or other means, including those oak woodlands and other areas identified by the Department of Fish and Game as being appropriate for ESHA designation.

P68 Environmentally sensitive habitat areas (ESHAs) shall be protected against significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. Residential use shall not be considered a resource dependent use.

P69 Development in areas adjacent to environmentally sensitive habitat areas (ESHAs) shall be subject to the review of the Environmental Review Board, 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.

P82 Grading shall be minimized for all new development to ensure the potential negative effects of runoff and erosion on these resources are minimized.

P94 Cut and fill slopes should be stabilized with planting at the completion of final grading. In Environmentally Sensitive Habitat Areas and Significant Watersheds, planting should be of native plant species using acceptable planting procedures, consistent with fire safety requirements. Such planting should be adequate to provide 90% coverage within 90 days, and should be repeated if necessary to provide such coverage. This requirement should apply to all disturbed soils. Jute netting or other stabilization techniques may be utilized as temporary methods. ...

The proposed project is located on the steep northern embankment of Las Flores Canyon Road, 130 feet south of Mile Marker 0.30, that has been undermined by erosion as a result of heavy storms in January 2005. The project is located along a 60 foot long section of road and embankment that descends to an unnamed ephemeral drainage. The County proposes to repair the road embankment above the drainage by excavating (10 cu. yds.) and benching approximately 250 sq. ft. of roadside slope and placement of geotextile filter fabric, 36 cu. yds. of fill, and 17 cu. yds. of rock rip-rap that is incorporated with willow plantings. The County proposes revegetation of the disturbed embankment area and reconstruction of the asphalt road shoulder in the project area. No work will be conducted within the drainage. The County has determined that the proposed project to remediate the eroding roadside slope is necessary in order to ensure the continued stability of the slope supporting Las Flores Canyon Road and to maintain the public's ability to use this road for vehicular access and emergency services/access to nearby developed residential communities. According to the applicant's submitted biological reconnaissance survey by URS Corporation, the project site is located on a steep roadside embankment that is dominated by plant species characteristic of a riparian woodland vegetation community. The proposed project will result in permanent impacts to an approximately 200 sq. ft. embankment area containing riparian woodland habitat.

Pursuant to Section **30107.5**, in order to determine whether an area constitutes an ESHA, and is therefore subject to the protections of Section 30240, the Commission must answer three questions:

- 1) Is there a rare species or habitat in the subject area?
- 2) Is there an especially valuable species or habitat in the area, which is determined based on:
 - a) whether any species or habitat that is present has a special nature, OR

- b) whether any species or habitat that is present has a special role in the ecosystem;
- 3) Is any habitat or species that has met either test 1 or test 2 (i.e., that is rare or especially valuable) easily disturbed or degraded by human activities and developments?

If the answers to questions one or two and question three are “yes”, the area is ESHA.

The project site is located within the Mediterranean Ecosystem of the Santa Monica Mountains. The Coastal Commission has found that the Mediterranean Ecosystem in the Santa Mountains is rare, and valuable because of its relatively pristine character, physical complexity, and resultant biological diversity. Large, contiguous, relatively pristine areas of native habitats, such as coastal sage scrub, chaparral, oak woodland, and riparian woodland have many special roles in the Mediterranean Ecosystem, including the provision of critical linkages between riparian corridors, the provision of essential habitat for species that require several habitat types during the course of their life histories, the provision of essential habitat for local endemics, the support of rare species, and the reduction of erosion, thereby protecting the water quality of coastal streams. Additional discussion of the special roles of these habitats in the Santa Monica Mountains ecosystem are discussed in the March 25, 2003 memorandum prepared by the Commission’s Ecologist, Dr. John Dixon¹ (hereinafter “Dr. Dixon Memorandum”), which is incorporated as if set forth in full herein.

Unfortunately, the native habitats of the Santa Monica Mountains, such as coastal sage scrub, chaparral, oak woodland and riparian woodlands are easily disturbed by human activities. As discussed in the Dr. Dixon Memorandum, development has many well-documented deleterious effects on natural communities of this sort. Thus, large, contiguous, relatively pristine areas of native habitats, such as coastal sage scrub, chaparral, oak woodland, and riparian woodlands are especially valuable because of their special roles in the Santa Monica Mountains ecosystem and are easily disturbed by human activity. Accordingly, these habitat types meet the definition of ESHA. This is consistent with the Commission’s past findings in support of its actions on many permit applications and in adopting the Malibu LCP².

As described above, the project site contains native riparian woodland habitat that is adjacent to an ephemeral drainage. Riparian woodlands occur along both perennial and intermittent streams in nutrient-rich soils. Partly because of its multi-layered vegetation, the riparian community contains the greatest overall biodiversity of all the plant communities in the area³. At least four types of riparian communities are discernable in the Santa Monica Mountains: walnut riparian areas, mulefat-dominated riparian areas,

¹ The March 25, 2003 Memorandum Regarding the Designation of ESHA in the Santa Monica Mountains, prepared by John Dixon, Ph. D, is available on the California Coastal Commission website at <http://www.coastal.ca.gov/ventura/smm-esh-memo.pdf>

² Revised Findings for the City of Malibu Local Coastal Program (as adopted on September 13, 2002) adopted on February 6, 2003.

³ Ibid.

willow riparian areas and sycamore riparian woodlands. Of these, the sycamore riparian woodland is the most diverse riparian community in the area. In these habitats, the dominant plant species include arroyo willow, California black walnut, sycamore, coast live oak, Mexican elderberry, California bay laurel, and mule fat. Wildlife species that have been observed in this community include least Bell's vireo (a State and federally listed species), American goldfinches, black phoebes, warbling vireos, bank swallows (State listed threatened species), song sparrows, belted kingfishers, raccoons, and California and Pacific tree frogs.

Riparian communities are the most species-rich to be found in the Santa Monica Mountains. Because of their multi-layered vegetation, available water supply, vegetative cover and adjacency to shrubland habitats, they are attractive to many native wildlife species, and provide essential functions in their lifecycles⁴. During the long dry summers in this Mediterranean climate, these communities are an essential refuge and oasis for much of the areas' wildlife.

Riparian habitats and their associated streams form important connecting links in the Santa Monica Mountains. These habitats connect all of the biological communities from the highest elevation chaparral to the sea with a unidirectional flowing water system, one function of which is to carry nutrients through the ecosystem to the benefit of many different species along the way.

The streams themselves provide refuge for sensitive species including: the coast range newt, the Pacific pond turtle, and the steelhead trout. The coast range newt and the Pacific pond turtle are California Species of Special Concern and are proposed for federal listing⁵, and the steelhead trout is federally endangered. The health of the streams is dependent on the ecological functions provided by the associated riparian woodlands. These functions include the provision of large woody debris for habitat, shading that controls water temperature, and input of leaves that provide the foundation of the stream-based trophic structure.

The importance of the connectivity between riparian areas and adjacent habitats is illustrated by the Pacific pond turtle and the coast range newt, both of which are sensitive and both of which require this connectivity for their survival. The life history of the Pacific pond turtle demonstrates the importance of riparian areas and their associated watersheds for this species. These turtles require the stream habitat during the wet season. However, recent radio tracking work⁶ has found that although the Pacific pond turtle spends the wet season in streams, it also requires upland habitat for refuge during the dry season. Thus, in coastal southern California, the Pacific pond

⁴ Walter, Hartmut. Bird use of Mediterranean habitats in the Santa Monica Mountains, Coastal Commission Workshop on the Significance of Native Habitats in the Santa Monica Mountains. CCC Hearing, June 13, 2002, Queen Mary Hotel.

⁵ USFWS. 1989. Endangered and threatened wildlife and plants; animal notice of review. Fed. Reg. 54:554-579. USFWS. 1993. Endangered and threatened wildlife and plants; notice of 1-year petition finding on the western pond turtle. Fed. Reg. 58:42717-42718.

⁶ Rathbun, G.B., N.J. Scott and T.G. Murphy. 2002. Terrestrial habitat use by Pacific pond turtle in a Mediterranean climate. *Southwestern Naturalist*. (in Press).

turtle requires both streams and intact adjacent upland habitats such as coastal sage scrub, woodlands or chaparral as part of their normal life cycle. The turtles spend about four months of the year in upland refuge sites located an average distance of 50 m (but up to 280 m) from the edge of the creek bed. Similarly, nesting sites where the females lay eggs are also located in upland habitats an average of 30 m (but up to 170 m) from the creek. Occasionally, these turtles move up to 2 miles across upland habitat⁷. Like many species, the pond turtle requires both stream habitats and the upland habitats of the watershed to complete its normal annual cycle of behavior. Similarly, the coast range newt has been observed to travel hundreds of meters into upland habitat and spend about ten months of the year far from the riparian streambed⁸. They return to the stream to breed in the wet season, and they are therefore another species that requires both riparian habitat and adjacent uplands for their survival.

Riparian habitats in California have suffered serious losses and such habitats in southern California are currently very rare and seriously threatened. In 1989, Faber estimated that 95-97% of riparian habitat in southern California was already lost⁹. Writing at the same time as Faber, Bowler asserted that, "[t]here is no question that riparian habitat in southern California is endangered."¹⁰ In the intervening 13 years, there have been continuing losses of the small amount of riparian woodlands that remain. Today these habitats are, along with native grasslands and wetlands, among the most threatened in California.

In addition to direct habitat loss, streams and riparian areas have been degraded by the effects of development. For example, the coast range newt, a California Species of Special Concern has suffered a variety of impacts from human-related disturbances¹¹. Human-caused increased fire frequency has resulted in increased sedimentation rates, which exacerbates the cannibalistic predation of adult newts on the larval stages.¹² In addition impacts from non-native species of crayfish and mosquito fish have also been documented. When these non-native predators are introduced, native prey organisms are exposed to new mortality pressures for which they are not adapted. Coast range newts that breed in the Santa Monica Mountain streams do not appear to have adaptations that permit co-occurrence with introduced mosquito fish and crayfish¹³. These introduced predators have eliminated the newts from streams where they previously occurred by both direct predation and suppression of breeding.

⁷ Testimony by R. Dagit, Resource Conservation District of the Santa Monica Mountains at the CCC Habitat Workshop on June 13, 2002.

⁸ Dr. Lee Kats, Pepperdine University, personal communication to Dr J. Allen, CCC.

⁹ Faber, P.A., E. Keller, A. Sands and B.M. Massey. 1989. The ecology of riparian habitats of the southern California coastal region: a community profile. U.S. Fish and Wildlife Service Biological Report 85(7.27) 152pp.

¹⁰ Bowler, P.A. 1989. Riparian woodland: An endangered habitat in southern California. Pp 80-97 in Schoenherr, A.A. (ed.) Endangered plant communities of southern California. Botanists Special Publication No. 3.

¹¹ Gamradt, S.C., L.B. Kats and C.B. Anzalone. 1997. Aggression by non-native crayfish deters breeding in California newts. Conservation Biology 11(3):793-796.

¹² Kerby, L.J., and L.B. Kats. 1998. Modified interactions between salamander life stages caused by wildfire-induced sedimentation. Ecology 79(2):740-745.

¹³ Gamradt, S.C. and L.B. Kats. 1996. Effect of introduced crayfish and mosquitofish on California newts. Conservation Biology 10(4):1155-1162.

Therefore, because of the essential role that riparian plant communities play in maintaining the biodiversity of the Santa Monica Mountains, because of the historical losses and current rarity of these habitats in southern California, and because of their extreme sensitivity to disturbance, the native riparian habitats in the Santa Monica Mountains meet the definition of ESHA under the Coastal Act. Accordingly, the Commission finds that the riparian woodland habitat in the project area and vicinity meets the definition of ESHA in the Coastal Act.

Nonetheless, the proposed project is a necessary repair project partially located within a riparian woodland plant community and will result in significant adverse impacts to this habitat. The Commission finds that riparian woodland habitat, such as the native vegetation located on the subject site, provide important habitat for riparian plant and animal species. The Coastal Act requires that environmentally sensitive habitat areas, such as the subject site, be maintained, enhanced, and where feasible, restored to protect coastal water quality downstream.

To assist in the determination of whether a project is consistent with Sections 30231 and 30240 of the Coastal Act, the Commission has, in past coastal development permit actions for new development in the Santa Monica Mountains, looked to the certified Malibu/Santa Monica Mountains Land Use Plan (LUP) for guidance. The 1986 LUP has been found to be consistent with the Coastal Act and provides specific standards for development within the Santa Monica Mountains. In its findings regarding the certification of the Malibu/Santa Monica Mountains LUP, the Commission emphasized the importance placed by the Coastal Act on protection of sensitive environmental resources finding that:

Environmentally sensitive habitat areas (ESHAs) shall be protected against significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. Residential use shall not be considered a resource dependent use.

Specifically, Policy 68 of the LUP, in concert with the policies of the Coastal Act, limits development within ESHA areas. In addition, Policy 82 of the LUP, in concert with the Coastal Act policies, provides that grading shall be minimized to ensure that the potential negative effects of runoff and erosion on watershed and streams is minimized. Further, Policy 94 requires that cut and fill slopes are stabilized with plantings after completion of grading.

The proposed project is designed to repair the existing public road that has been undermined due to storm activity. The project constitutes necessary repair and maintenance work. The Commission has expressly recognized, since 1978, certain types of public road-related repair and maintenance work as exempt from permit requirements pursuant Public Resources Code ("PRC") Section 30610(d). See "Repair, Maintenance and Utility Hook-Up Exclusions From Permit Requirements" (adopted by the Commission on Sept. 5, 1978) (hereafter, "R&M Exclusions") Appendix I, § 3 (referring to "installation of slope protection devices, minor drainage facilities"). However, the exemptions provided by the above referenced section of the Public

Resources Code and the R&M Exclusions are limited. Accordingly, California Code of Regulations, Title 14 ("14 CCR"), Section 13252(a) of lists extraordinary methods of repair and maintenance that do still require a permit. Among those methods is any repair or maintenance "located in an environmentally sensitive habitat area" 14 CCR § 13252(a)(3). Since this project would occur within such an area, the method by which this project is conducted is not exempt, and a permit is required.

In addition, further review of the R&M Exclusions Guidelines confirms that this proposed repair and maintenance is not exempt from permit requirements under that document either, because the proposed development is located outside the "roadway prism" or the roadway property or easement.

Similarly, Section 13252(a) of the Commission's regulations states that "activities specifically described in the [R&M Exclusions guidance document] that will have a risk of substantial adverse impact on ... environmentally sensitive habitat area" are not exempt based on that document and may require a coastal development permit, pursuant to the normal application of section 13252.

Thus, in this case, although the project is a repair and maintenance project, since the work is to be performed within an ESHA, Section 13252(a)'s limits on the repair and maintenance exemption do apply, and this project does require a permit to ensure that the method employed is as consistent as possible with the Chapter 3 policies of the Coastal Act. Moreover, this project involves excavation, and the R&M Exclusions guidance document expressly states that a permit is required "for excavation . . . outside of the roadway prism" *Id.* at § II.A., page 2. Therefore, a coastal development permit is required for this project.

The applicant's proposed repair/replacement strategy will involve excavating (10 cu. yds.) and benching approximately 250 sq. ft. of roadside slope and placement of geotextile filter fabric, 36 cu. yds. of fill, and 17 cu. yds. of rock rip-rap that is incorporated with willow plantings. The County proposes revegetation of the disturbed embankment area and reconstruction of the asphalt road shoulder in the project area. No work will be conducted within the drainage. It is necessary to place the riprap to anchor/support the compacted fill to the hillside and provide long-term slope stability during future storm events. Without the placement of this riprap the repaired embankment of the road could be further undermined in future storm events. The County has submitted an engineering analysis for the proposed repair/replacement strategy and the three identified alternatives to repair the eroded embankment of the road that was undermined during the January 2005 storm event. The analysis submitted by the County's engineering staff identified the following three alternatives to the proposed project:

1. Reconstruction of the slope at a less steep gradient of 2:1 (instead of 1.5:1 to 1:1) in order to eliminate the use of rip rap: Due to the limited area and steep topography between Las Flores Canyon Road and the downslope ephemeral drainage, reconstruction of the slope at a less steep gradient and revegetating

the slope would involve a significantly larger footprint and encroachments into the road and the downslope drainage as a result. Further, the increased footprint would require the removal of a greater area of native vegetation and trees that would otherwise be undisturbed.

2. Reconstruction of slope utilizing a geogrid retaining wall instead of rip rap: The use of a retaining wall would further limit the amount of area of the repaired slope that could be replanted with native vegetation, resulting in potentially greater adverse impacts to riparian ESHA.
3. Excavate, backfill and shotcrete cover: This alternative would involve excavation of the unstable slope material, compaction of the backfilled sediment, and topping the compacted slope with shotcrete. The repaired slope would have no possibility for replanting of vegetation.

As noted above, the alternative repair strategies are not considered viable for implementation since they are considered either infeasible or not environmentally preferable to the proposed project because they would result in greater adverse impacts to sensitive habitat than the proposed project itself.

Although the proposed project is the environmentally preferred alternative, it will still result in some unavoidable adverse impacts to ESHA on site, including the placement of approximately 17 cubic yards of rip rap over a 200 sq. ft. area that will result in the loss of riparian woodland habitat. In past permit actions, the Commission has found that in order to ensure that repair work is as consistent as possible with the above referenced resource protection policies of both the Coastal Act and LUP, all sensitive riparian woodland habitat areas on site that will be displaced as a result of proposed development should be mitigated. Therefore, the Commission finds that **Special Condition One (1)** is necessary to ensure that adverse effects to the riparian woodland habitat from increased erosion and sedimentation are minimized and that the revegetation plan is successful. Specifically, **Special Condition One (1)** requires the applicant submit, for the review and approval of the Executive Director, a Riparian Woodland Habitat Mitigation and Restoration Plan, prepared by a biologist or environmental resource specialist with qualifications acceptable to the Executive Director, for all areas of the project site temporarily disturbed by grading and construction activities and/or permanently displaced. The plan shall provide for: 1) revegetation for areas of the project site temporarily disturbed by grading and construction activities with native plant species of local genetic stock appropriate for riparian woodland habitat; 2) the proposed incorporation of willow plantings and geotextile filter fabric among the proposed rip rap; and 3) the restoration of riparian woodland habitat (at a ratio of 3:1 or greater) as mitigation for all areas permanently displaced by the proposed project (approximately 200 sq. ft. area of proposed rip rap). The restoration may be implemented on the project site if appropriate area exists, or alternatively, the restoration may be implemented off-site on property owned by the Mountains Restoration Trust (MRT), or other appropriate entity, subject to the review and approval of the Executive Director. The restoration area shall be delineated on a

site plan and shall be located in the same vicinity of the project site within the coastal zone of the Santa Monica Mountains. All invasive and non-native plant species shall be removed from the restoration area. The restoration plan for off-site mitigation shall be prepared in consultation with the MRT. In addition, **Special Condition One (1)** also requires the applicant implement an annual monitoring program for a period of five years to ensure the success of the replanting. If the monitoring report indicates the vegetation and restoration is not in conformance with or has failed to meet the performance standards specified in the restoration plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental restoration plan for the review and approval of the Executive Director and shall implement the approved version of the plan. The revised restoration plan must be prepared by a qualified biologist or Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

The project area is adjacent to an unnamed ephemeral drainage and the potential exists for impacts to the water quality, particularly from erosion of sediment from the site. There is potential for temporary adverse impacts to water quality and biological productivity of the drainage through the release of sediment. Soil disturbance and vegetation removal adjacent to the creek could result in the discharge of sediment, causing increased turbidity and adversely affecting fish and other sensitive aquatic species in downstream waters. Sediment is considered a pollutant that affects visibility through the water, and affects plant productivity, animal behavior (such as foraging) and reproduction, and the ability of animals to obtain adequate oxygen from the water. Sediments may physically alter or reduce the amount of habitat available in a watercourse by replacing the pre-existing habitat structure with a stream-bottom habitat composed of substrate materials unsuitable for the pre-existing aquatic community. In addition, sediment is the medium by which many other pollutants are delivered to aquatic environments, as many pollutants are chemically or physically associated with the sediment particles. Conducting the proposed work when water flows are absent or minimal during the dry season will minimize erosion into the creek, associated turbidity, and will minimize the potential for disturbing local amphibians and fishes. Including best management practices that control construction debris and sediments during construction will also minimize impacts to water quality. As such, **Special Condition No. Four (4)** outlines construction timing and best management practices to be implemented during all approved work activities.

In addition, the mature oak and walnut trees located in the vicinity of the proposed site are a sufficient distance away from the proposed work area that their removal or encroachment is not anticipated to be necessary by the applicant's biological consultant or Commission staff. The County proposes to flag the trees during construction to ensure that they are avoided. However, to ensure that the native trees are protected during grading and construction activities, **Special Condition No. Three (3)** requires the applicants to install protective barrier fencing around the drip lines of the on-site native oak and walnut trees during construction operations. In addition, in order to ensure that no impacts outside the scope of work allowed by this permit occur to the

native trees that are in the vicinity of proposed development, **Special Condition 3** also requires the applicants to retain the services of a qualified biological consultant or arborist, who shall be present on site during construction and grading operations. The consultant shall immediately notify the Executive Director if unpermitted activities occur or if any other oak/walnut trees on the site are damaged, removed, or impacted beyond the scope of the work allowed by this permit. This monitor shall have the authority to require the applicants to cease work should any breach in permit compliance occur, or if any unforeseen sensitive habitat issues arise. The applicant shall provide off-site oak and walnut tree mitigation, at a 10:1 ratio, in the event that any native tree is damaged or lost.

The Commission finds that the proposed project, only as conditioned, will serve to maintain and enhance the quality of coastal waters and to minimize impacts to environmentally sensitive habitat area, consistent with Sections 30231 and 30240 of the Coastal Act and the guidance policies of the LUP.

C. Hazards and Geologic Stability

Coastal Act Section 30253 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.***

The proposed development is located in the Santa Monica Mountains, an area which is generally considered to be subject to an unusually high amount of natural hazards. Geologic hazards common to the Santa Monica Mountains include landslides, erosion, and flooding. In addition, fire is an inherent threat to the indigenous chaparral community of the coastal mountains. Wild fires often denude hillsides in the Santa Monica Mountains of all existing vegetation, thereby contributing to an increased potential for erosion and landslides on property.

The proposed project is located on the steep northern embankment of Las Flores Canyon Road, 130 feet south of Mile Marker 0.30, that has been undermined by erosion as a result of heavy storms in January 2005. The project is located along a 60 foot long section of road and embankment that descends to an unnamed ephemeral drainage. The County proposes to repair the road embankment above the drainage by excavating (10 cu. yds.) and benching approximately 250 sq. ft. of roadside slope and placement of geotextile filter fabric, 36 cu. yds. of fill, and 17 cu. yds. of rock rip-rap that is incorporated with willow plantings. The County proposes revegetation of the disturbed embankment area and reconstruction of the asphalt road shoulder in the project area. No work will be conducted within the drainage. The County has determined that the proposed project to remediate the eroding roadside slope is necessary in order to

ensure the continued stability of the slope supporting Las Flores Canyon Road and to maintain the public's ability to use this road for vehicular access and emergency services/access to nearby developed residential communities.

However, the Commission also notes that the proposed development, although necessary to remediate a hazardous eroding slope condition, will still not eliminate the potential for erosion of the steep slope on the subject site. The Commission finds that minimization of site erosion will add to the stability of the site. Erosion can best be minimized by requiring the applicant to plant all disturbed areas of the site with native plants compatible with the surrounding habitat. Further, in past permit actions, the Commission has found that invasive and non-native plant species are typically characterized as having a shallow root structure in comparison with their high surface/foilage weight and/or require a greater amount of irrigation and maintenance than native vegetation. The Commission notes that non-native and invasive plant species with high surface/foilage weight and shallow root structures do not serve to stabilize steep slopes, such as the slopes on the subject site, and that such vegetation results in potential adverse effects to the geologic stability of the project site. In comparison, the Commission finds that native plant species are typically characterized not only by a well developed and extensive root structure in comparison to their surface/foilage weight but also by their low irrigation and maintenance requirements. As part of the proposed project, the applicant proposes to stabilize all disturbed areas on the project site with native vegetation appropriate for the riparian woodland habitat area.

Further, the project, as proposed to ensure that the disturbed slopes are revegetated with native vegetation, has been designed to ensure slope stability on site to the maximum extent feasible. However, the Coastal Act recognizes that certain development projects located in geologically hazardous areas, such as the subject site, still 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 individual's right to use his property. As such, the Commission finds that due to the foreseen possibility of erosion and slope failure, the applicant shall assume these risks as a condition of approval. Therefore, **Special Condition No. Two (2)** requires the applicant to waive any claim of liability against the Commission for damage to life or property which may occur as a result of the permitted development. The applicant's assumption of risk, will show 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.

Therefore, for the reasons discussed above, the Commission finds that the proposed project, as conditioned, is consistent with Section 30253 of the Coastal Act.

D. Local Coastal Program

Section **30604(a)** of the Coastal Act states:

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).

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 to Chapter 3 policies of the Coastal Act. The preceding sections provide findings that the proposed projects will be in conformity with the provisions of Chapter 3 if certain conditions are incorporated into the projects and are accepted by the applicant. As conditioned, the proposed development will avoid or minimize adverse impacts and is found to be consistent with the applicable policies contained in Chapter 3. The following special conditions are required to assure the project's consistency with Section 30604 of the Coastal Act:

Special Conditions 1 through 4

Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the County of Los Angeles' ability to prepare a Local Coastal Program for this area which is also consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

E. California Environmental Quality Act

Section 13096(a) of the Commission's administrative 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 that the activity may have on the environment.

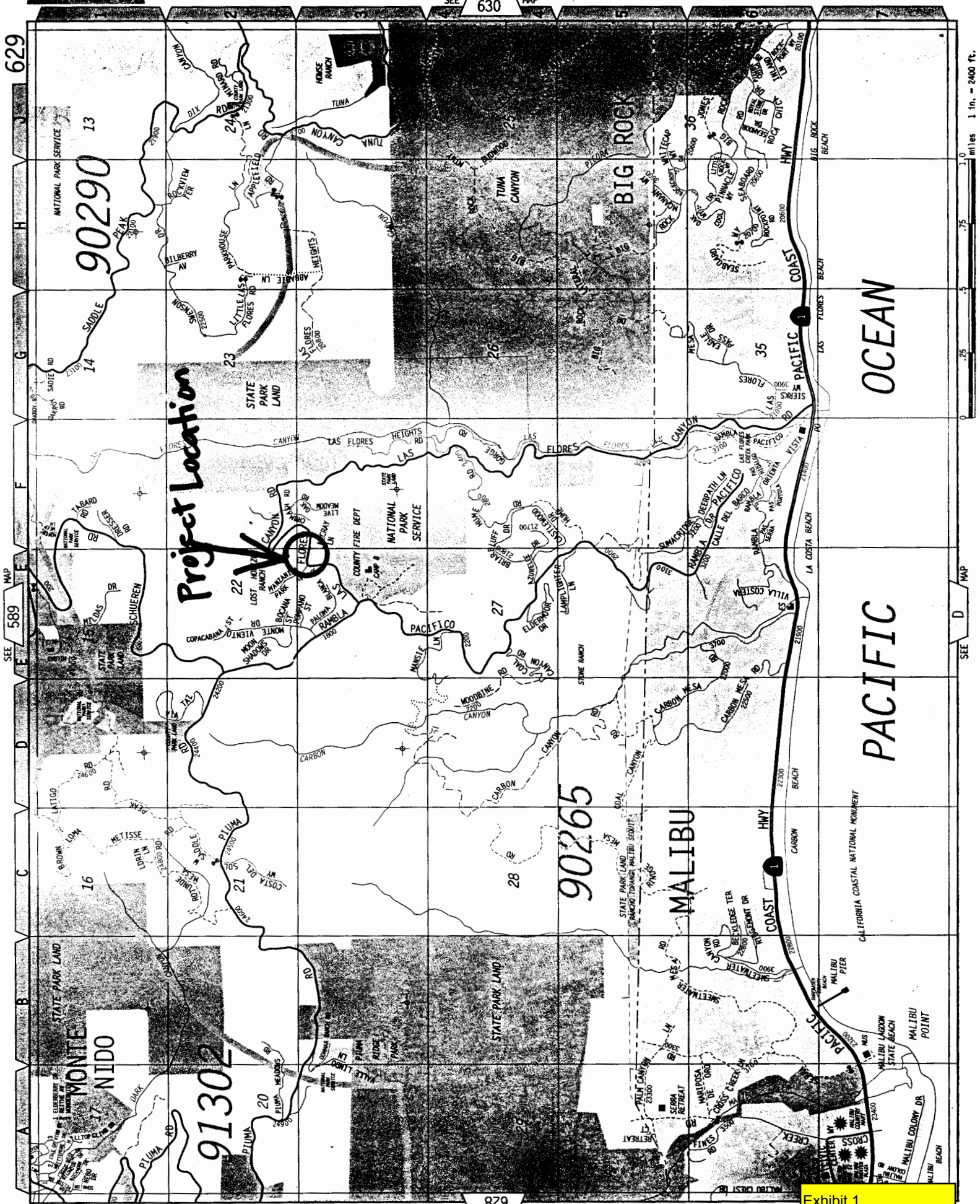
The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. These findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. As discussed in detail above, project alternatives and mitigation measures have been considered and incorporated into the project. Five types of mitigation actions include those that are intended to avoid, minimize, rectify, reduce, or compensate for significant impacts of development. Mitigation measures required to avoid impacts include native tree protection and monitoring (ESHA). Mitigation measures required to minimize impacts include requiring best management practices and construction timing during the dry season (ESHA and water quality). Finally, the

riparian woodland habitat mitigation condition is a measure required to compensate for impacts to ESHA.

The following special conditions are required to assure the project's consistency with Section 13096 of the California Code of Regulations:

Special Conditions 1 through 4

As conditioned, there are no feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, can be found to be consistent with the requirements of the Coastal Act to conform to CEQA.



Project Location

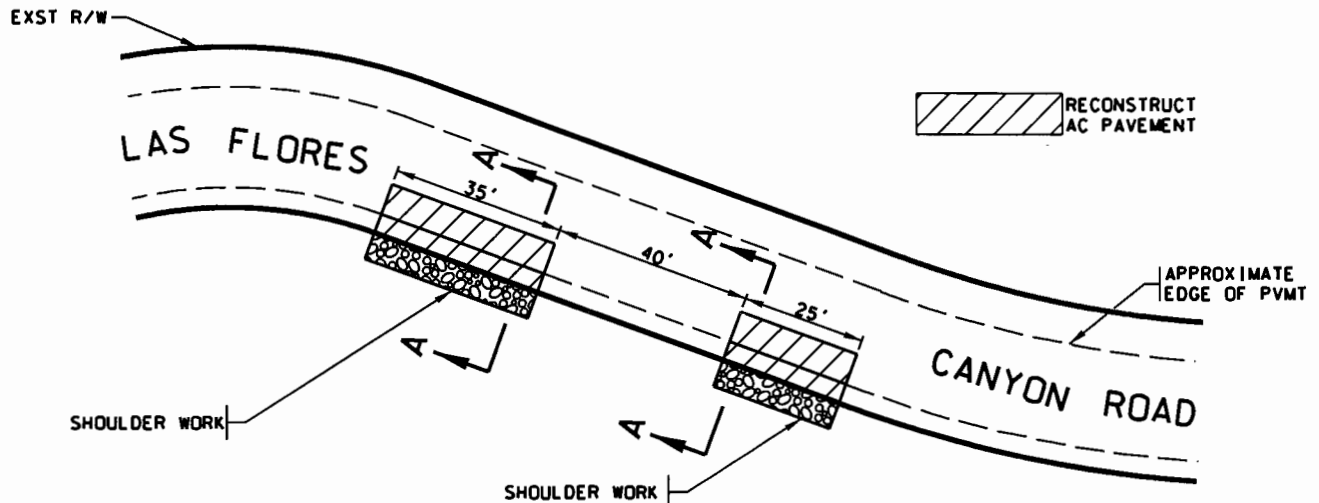
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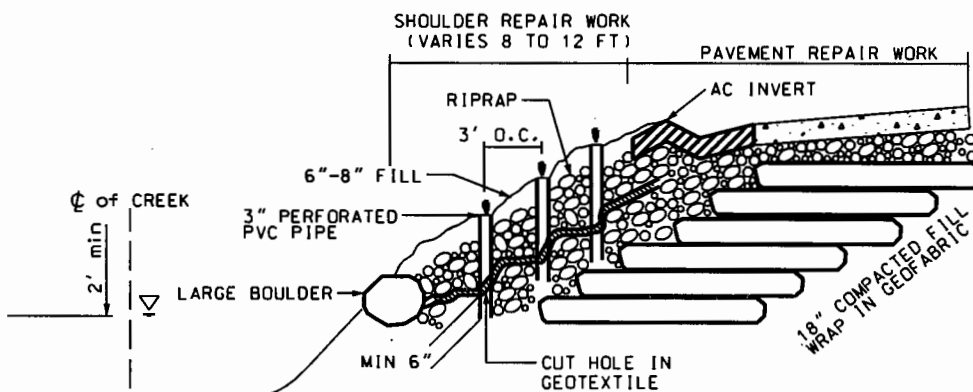
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PLAN

NO SCALE



PLANTING NOTES

1. WILLOW CUTTINGS SHALL BE 1/2 TO 1&1/2 INCHES IN DIAMETER.
2. DRIVE WILLOW STAKE INTO PERFORATED PVC PIPE, THROUGH SAND, GEOTEXTILE, AND 6 INCHES INTO NATIVE GRADE, ACCORDING TO SPEC.
3. USE WILLOW COLLECTED NEAR WORK SITE ACCORDING TO SPEC.
4. SURFACE SEDIMENT WILL BE HYDROSEEDED WITH A NATIVE SEED MIX.

SECTION A-A

NO SCALE

Los Angeles County
Department of Public Works
The Information Shown Hereon is
PRELIMINARY
Unofficial and Subject to Change
Revised 09/22/2008

NOTE: ALL DIMENSIONS SUBJECT TO CHANGE IN THE FIELD

R831336084 T.G. 629-E3
LAS FLORES CANYON ROAD 130' S/O MM 0.30

Exhibit 2
4-06-137 (LACDPW)
Site Plan



Note:
Location of
proposed
project site
(looking east)



Note:
Location of
proposed
project site
(looking west)

