

RECORD PACKET COPY

STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, Governor

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 641-0142



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Hearing Date: January 9-12, 1996
Commission Action:

STAFF REPORT: REGULAR CALENDAR

TH 11g

APPLICATION NO.: 4-95-187

APPLICANT: Los Angeles County Public Works Department

AGENT: Jennifer Fang - LACPWD

PROJECT LOCATION: Las Flores Canyon Road Mile Marker 1.98, Malibu area of Los Angeles County.

PROJECT DESCRIPTION: The remediation of a landslide through the development of a buttress fill involving 10,000 cubic yards in a drainage adjacent to Las Flores Creek, and the installation of a 10' by 6.5' reinforced concrete box.

LOCAL APPROVALS RECEIVED: None.

SUBSTANTIVE FILE DOCUMENTS: California Coastal Act of 1976 as of January 1995, CDP # 4-94-059, Revegetation Program For Las Flores Canyon Road (Mile Marker 1.98), dated November 1994, prepared by Michael Brandman Associates, for CDP 4-94-059, Emergency CDP #G4-95-187.

SUMMARY OF STAFF RECOMMENDATION:

The applicant seeks a follow up coastal development permit for the remediation of a landslide involving the grading of approximately 10,000 cubic yards to create a buttress fill and the installation of a new 10' wide, 6.5' tall reinforced box culvert which will extend along the top of the buttress fill, under a compacted fill surface, and outlet below the toe of the slope. The outlet of this drainage structure includes a "dragon's tooth" rock grouted rock energy reducing device. The total area affected by this project is 1.7 acres, 0.8 acres of which is within a designated blueline stream. The Commission granted the applicant an emergency CDP in September of 1995, as the one lane of Las Flores Canyon Road was closed due to landsliding, and the remaining lane was threatened with closure. Staff is recommending approval of the proposed project subject to special conditions regarding a restoration and monitoring program, erosion control plans, and condition compliance.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions.

The Commission hereby grants a permit, subject to the conditions below, for the proposed development on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, 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 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

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. Compliance. All development must occur in strict compliance with the proposal as set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. 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.
7. 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. Restoration and Monitoring Program

Prior to the issuance of a coastal development permit the applicant shall submit, for the review and approval of the Executive Director, a detailed restoration program for all areas disturbed by grading and construction activities related to this project. This includes newly developed or widened roads and staging areas. This program shall be implemented by qualified

biologists, ecologists, or resource specialists who are experienced in the field of restoration ecology, and whom have a background knowledge of the various habitats associated with the Santa Monica Mountains and the project sites. The restoration program shall address the goals and strategies of the Revegetation Program For Las Flores Canyon Road (Mile Marker 1.98), dated November 1994, prepared by Michael Brandman Associates, for CDP 4-94-059, and shall include, but not be limited to the following:

- A. A Preliminary Biological Survey which is to include a description of the site, its native habitat, and a list of the typical trees, shrubs, and herbs associated with this habitat, as well as those found to exist at the time of the survey. This survey shall include photographs of each site taken from predesignated photo locations (annotated to a copy of the site plans). The same photo sites shall be used throughout the restoration and monitoring phase to provide a visual status of project progress.
- B. Technical Specifications shall be designed to address the findings of the preliminary survey. These specifications shall provide the framework for the installation, and be implemented as the approved plan for the restoration project. The specifications shall include a schedule to implement the program, a final list of plant materials, and description of the methods to be used during implementation of the plan. The specifications shall require, to the greatest extent possible, that all biological materials used on the project site be of local origin; that is, that seeds, cuttings, salvaged plants, microorganisms, and top soil originate on site or from the nearest possible source that matches the site in climatic and biologic factors. The specifications shall also include maintenance criteria for weeding, re-planting and other mid-program corrections.

C. Monitoring Program

A five year (5) Monitoring Program which monitors the restoration project for compliance with the guidelines and performance standards listed in the proposed survey and technical specifications. The applicant shall submit, for the review and approval of the Executive Director, a written report after the second year following implementation of the restoration program, indicating the success or failure of the restoration program and include recommendations for mid-program corrections, if necessary. At the end of a five year period, a final detailed report shall be submitted for review and approval of the Executive Director. If this report indicates that the restoration project has in part, or in whole, been unsuccessful, based on the approved performance standards, the applicant shall be required to submit a revised or supplemental program to compensate for those portions of the original program which were not successful. The revised, or supplemental restoration program shall be processed as an amendment to this Coastal Development Permit.

2. Erosion Control Plans

Prior to the issuance of a coastal development permit the applicant shall submit, for the review and approval of the Executive Director, an interim erosion control plan for all areas disturbed by development and grading activities, which includes:

1. Description of temporary drainage and erosion control features such as sandbagging, tarping, desilting basins, or any alternative best management practices to minimizing erosion from staging, construction areas, and access roads. The temporary plans shall also include an illustration of where these measures shall be applied on a site plan.
2. Time frame for the placement and removal of the temporary erosion control measures, and a maintenance schedule and criteria for maintenance.

3. Condition Compliance

The applicant is required to implement the Restoration & Monitoring Program specified in the foregoing conditions prior to October 1, 1996 rain season. Failure to comply with the requirements within the time period specified, or within such additional time as may be granted by the Executive Director for good cause, will nullify this permit approval.

4. Required Approvals

Prior to the issuance of a coastal development permit, the applicant shall submit to the Executive Director of the Commission; Los Angeles County Environmental Review Board Approval, a copy of a valid U.S. Army Corp of Engineers permit, California Regional Water Quality Board approval, California Department of Fish & Game Streambed Alteration Agreement, and/or letters of permission, or evidence that such approvals are not required.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description

The applicant seeks a follow up coastal development permit for the remediation of a landslide involving the grading of approximately 10,000 cubic yards to create a buttress fill and the installation of a new 10' wide, 6.5' tall reinforced box culvert which will extend along the top of the buttress fill, under a compacted fill surface, and outlet below the toe of the slope. The outlet of this drainage structure includes a "dragon's tooth" rock grouted rock energy reducing device. The total area affected by this project is 1.7 acres, 0.8 acres of which is within a designated blueline stream. The project area is located on a slope disturbed by emergency development over the past two years. Most of the vegetation commonly associated with this area has been removed by this development and has been replaced by invasive, non-native, exotic grasses and weeds. The site is located just below Las Flores Canyon Road, and directly above Las Flores Creek. The Commission granted the applicant an emergency CDP in September of 1995, as the one lane of Las Flores

Canyon Road was closed due to landsliding, and the remaining lane was threatened with closure of the road. In August of 1994, the Commission granted the applicant a CDP, 4-95-059, to develop a 200' long, 108" diameter corrugated steel pipe culvert at this location. The landslide occurred prior to the development of this culvert.

B. Environmentally Sensitive Habitat Areas.

Section 30231 of the Coastal Act is designed to protect and enhance, or restore where feasible the biological productivity and quality of coastal waters, including streams:

Section 30231:

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.

In addition, Section 30240 of the Coastal Act states that environmentally sensitive habitat areas must be protected against disruption of habitat values:

Section 30240:

(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.

ESHA Issue Analysis

The applicant seeks a follow up coastal development permit for the remediation of a landslide involving the grading of approximately 10,000 cubic yards to create a buttress fill and the installation of a new 10' wide, 6.5' tall reinforced box culvert which will extend along the top of the buttress fill, under a compacted fill surface, and outlet below the toe of the slope. The outlet of this drainage structure includes a "dragon's tooth" rock grouted rock energy reducing device. The total area affected by this project is 1.7 acres, 0.8 acres of which is within a designated blueline stream. The project site is located up slope, and drains into, Las Flores Creek, an area recognized by the Commission as an Environmentally Sensitive Habitat Area. In August of 1994, the Commission granted the applicant a coastal development permit, CDP #4-94-059, to develop a 200' long, 108" diameter corrugated steel culvert at this location; however, the landslide occurred prior to the development of this culvert, requiring that the project be redesigned to include a larger drainage structure and a buttress fill.

The applicant submitted a Revegetation Program For Las Flores Canyon Road (Mile Marker 1.98), dated November 1994, prepared by Michael Brandman Associates, for CDP 4-94-059. The report states that the site contains Coastal Sage Scrub habitat, and that species such as California Gnatcatcher (*Polioptila californica californica*) and Coastal Cactus Wren (*Campylorhynchus brunneicapillus*), both of which are listed State and Federally as threatened or as species of special concern, should be expected to occur at this site. In order to ensure that this habitat, and its species, remained viable, the applicant was required to submit a habitat restoration and monitoring program for the site and all areas affected by development. The restoration program submitted by the applicant involved the restoration of Coastal Sage Habitat through the seeding of the site with various species associated with this habitat, and which occur in the adjacent, non-disturbed, habitat areas. Furthermore, the applicant was required to monitor restoration activities for a period no less than five years. It should be noted that the landslide occurred prior to the commencement of construction and restoration activities. It should be noted that although the project site is located in a designated blue-line stream no riparian vegetation was removed or been directly impacted as a part of this project.

This area has a great potential for erosion, as it is now devoid of vegetation or another form of erosion control. Soil erosion and the associated sedimentation of streams can adversely impact upland and riparian habitats. These adverse impacts can include:

1. Eroded soil contains nitrogen, phosphorus, and other nutrients. When carried into water bodies, these nutrients trigger algal blooms that reduce water clarity and deplete oxygen which lead to fish kills, and create odors.
2. Erosion of streambanks and adjacent areas destroys streamside vegetation that provides aquatic and wildlife habitats.
3. Excessive deposition of sediments in streams blankets the bottom fauna, "paves" stream bottoms, and destroys fish spawning areas.
4. Turbidity from sediment reduces in-stream photosynthesis, which leads to reduced food supply and habitat.
5. Suspended sediment abrades and coats aquatic organisms.
6. Erosion removes the smaller and less dense constituents of topsoil. These constituents, clay and fine silt particles and organic material, hold nutrients that plants require. The remaining subsoil is often hard, rocky, infertile, and droughty. Thus, reestablishment of vegetation is difficult and the eroded soil produces less growth.

The Coastal Act requires that environmentally sensitive habitat areas "be maintained, enhanced, and where feasible, restored." The newly proposed project involves a more significant and greater area of disturbance, than that which was previously permitted by the Commission. To ensure the sensitive coastal sage scrub upland habitat is restored as well as ensure protection of the adjacent Las Flores Creek ESHA from sedimentation and erosion, the Commission finds that it is necessary to require the following special conditions. Special Condition #1 of the permit requires that the applicant submit, for the review and approval of the Executive Director, a Habitat Restoration Program for the project area that identifies the indigenous vegetation associated with the proposed project site, significant

vegetation that exists within the development area, and the methods to be used to restore vegetation to all areas disturbed by development. This program should reflect the findings and the restoration goals and strategies identified in the program developed by Michael Brandman Associates for CDP #4-94-059.

Additionally, Special Condition #1 also requires the applicant to monitor the restoration activities for a period of no less than 5 years to insure the long term survivability of restoration efforts. This program will allow for mid-course corrections and maintenance to ensure that site habitat restoration is successful. In order to ensure that restoration of the site is conducted in a timely manner, Special Condition #3 requires the applicant to implement the restoration and monitoring program prior to the 1996-1997 rain season. Furthermore, Special Condition #2 requires the applicant to submit interim erosion control plans for areas disturbed by grading and development activities which indicate the best management practices implemented to control erosion and sedimentation on site. The use of best management practices will help to ensure that sedimentation is controlled on site until such time that restoration efforts are completed.

Special Condition #4 requires that the applicant provide the Executive Director with a copy of a valid U.S. Army Corp of Engineers permit, California Regional Water Quality Board approval, and California Department of Fish & Game Streambed Alteration Agreement, prior to the issuance of a coastal development permit. If these permits and agreements are not required, then the applicant shall provide the Executive Director with evidence that such approvals are not required. Therefore, the Commission finds that the project, as conditioned is consistent with Sections 30231 and 30240 of the Coastal Act.

C. Geologic Stability

Section 30253 of the Coastal Act states:

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 applicant seeks a follow up coastal development permit for the remediation of a landslide involving the grading of approximately 10,000 cubic yards to create a buttress fill and the installation of a new 10' wide, 6.5' tall reinforced box culvert which will extend along the top of the buttress fill and outlet below the toe of the slope. The outlet of this drainage structure includes a "dragon's tooth" rock grouted rock energy reducing device. 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 vegetation, thereby contributing to an increased potential for erosion and landslide on the property.

The Coastal Act requires that new development assure "stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area..." The stabilization of this landslide is necessary to keep Las Flores Canyon open. Las Flores Canyon provides primary access to hundreds of residences in the area. Closure of this road would mean the only access route to this area would be via Saddlepeak Road which would require a detour of considerable time and distance. Closure of this road would also mean there would be only one access route into the area and would increase emergency vehicle response times considerable.

The County engineers indicate the buttress fill slope and box culvert will stabilize the roadway. However, there is a very large fill slope and area of disturbance associated with the project which will be subject to surface erosion if not properly revegetated. Therefore, in order to minimize erosion and provide geologic stability by inhibiting surface infiltration, the Commission finds it necessary to require the applicant to submit a Habitat Restoration Program for all areas of the site disturbed by development activities. This program will require the applicant to re-establish a native, indigenous, vegetative cover at the site for habitat and erosion control purposes. Furthermore, Special Condition #1 also requires the applicant to monitor restoration activities for a period of no less than 5 years to insure the long term survivability of restoration efforts. In order to ensure that restoration of the site is conducted in a timely manner, Special Condition #3 requires the applicant to implement the restoration and monitoring program prior to the 1996-1997 rain season. Furthermore, Special Condition #2 requires the applicant to submit interim erosion control plans for areas disturbed by grading and development activities which indicate the best management practices implemented to control erosion and sedimentation on site. The use of best management practices will help to ensure that sedimentation is controlled on site until such time that restoration efforts are completed. Only as conditioned is the proposed project consistent with Section 30253 of the Coastal Act.

D. Grading/Landform Alteration & Visual Resources

Section 30251 of the Coastal Act state:

Section 30251

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The applicant seeks a follow up coastal development permit for the remediation of a landslide involving the grading of approximately 10,000 cubic yards to create a buttress fill and the installation of a new 10' wide, 6.5' tall reinforced box culvert which will extend along the top of the buttress fill and outlet below the toe of the slope. The outlet of this drainage structure includes a "dragon's tooth" rock grouted rock energy reducing device. This project is highly visible from Las Flores Canyon Road, the main access road in and out of Las Flores Canyon, and from Las Flores Heights Road located down slope of the project area along Las Flores Creek.

Although there is approximately 10,000 cu. yds. of fill proposed to buttress this landslide the applicant has attempted to minimize grading to only that which is necessary to stabilize the landslide and roadway. In addition, although the proposed project is not visible from the road way it is visible from surrounding ridgeline areas of Las Flores Canyon. The 1.7 acres of disturbed area if not adequately revegetated could adversely impact the scenic resources of the area. Therefore, in order to restore the scenic and visual qualities of the site, the Commission finds it necessary to require the applicant to submit a Habitat Restoration Program for the site. This program shall require the applicant to restore the site with native, indigenous, vegetation, which will in turn provide erosion control to the site, and restore the scenic and visual qualities of the area. Furthermore, Special Condition #1 also requires the applicant to monitor restoration activities for a period of no less than 5 years to insure the long term survivability of revegetation efforts. In order to ensure that restoration of the site is conducted in a timely manner, Special Condition #3 requires the applicant to implement the restoration and monitoring program prior to the 1996-1997 rain season.

The Commission finds that the project as conditioned, is consistent with Section 30251 of the Coastal Act.

E. Local Coastal Program.

Section 30604 of the Coastal Act states that:

(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 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. On December 11, 1986, the Commission certified the Land Use Plan portion of the Malibu/Santa Monica Mountains Local Coastal Program. The certified LUP contains policies to guide the types, locations, and intensity of future development in the Malibu/Santa Monica Mountains area. Among these policies are those specified in the preceding sections regarding environmentally sensitive resources. As

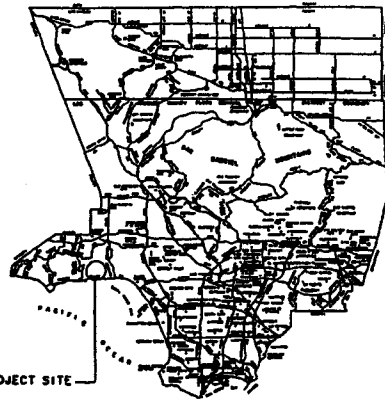
conditioned, the proposed development, as conditioned, will not create adverse impacts and is consistent with the policies contained in the LUP. Therefore, the Commission finds that approval of the proposed development will not prejudice the County's ability to prepare a Local Coastal Program implementation program for Malibu and the Santa Monica Mountains which is consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

F. CEQA.

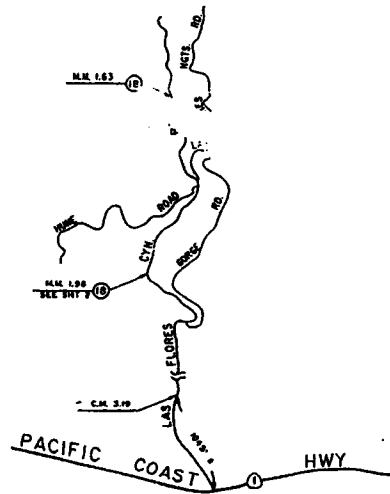
Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned, to be consistent with any applicable requirement of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. There are no negative impacts caused by the proposed development, as conditioned, which have not been adequately mitigated. Therefore, the proposed project, as conditioned, is found to be consistent with CEQA and the policies of the Coastal Act.

TAD-VNT
1849M

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS LAS FLORES CANYON ROAD AT MILE MARKER 1.98



LOCATION MAP



KEY MAP
NO SCALE

PRELIMINARY
Subject and Subject To Change
MAY 24 1985
LA COUNTY
DEPT. OF PUBLIC WORKS

INDEX

SHEET NO. 1	TITLE SHEET AND DETAILS
SHEET NO. 2	PLAN, PROFILE, AND DETAILS
SHEET NO. 3	GRADING PLAN

CONSTRUCTION NOTES

1. PRIME CONTRACTOR SHALL BE REQUIRED: CLASS A.
2. ALL STRUCTURES SHALL BE CONSTRUCTED PER APWA STANDARD PLANS, UNLESS OTHERWISE SHOWN. THE ASPHALT CONCRETE PAYMENT LEGEND, FOR PAYMENT MIX TYPE, IS PER LACDPW STD. 1010-0.
3. FIELD DENSITY AFTER ROLLING OF ALL ASPHALT CONCRETE PLACED ON THIS PROJECT SHALL BE A MINIMUM OF 95 PERCENT RELATIVE COMPACTION, PER SUBSECTION 302-5.6.2 OF THE STANDARD SPECIFICATIONS.
4. ALL CSP SHALL INCLUDE GASKETED JOINTS.
5. THE ASPHALT CONCRETE MIX FOR PAVEMENT RESTORATION OVER THE TRENCH SHALL BE P-1 MIX.
6. BEDDING FOR CONCRETE BOX SHALL BE PER LACDPW STD. 3080-0, NOTE 4, A MINIMUM OF 6 INCHES THICK.

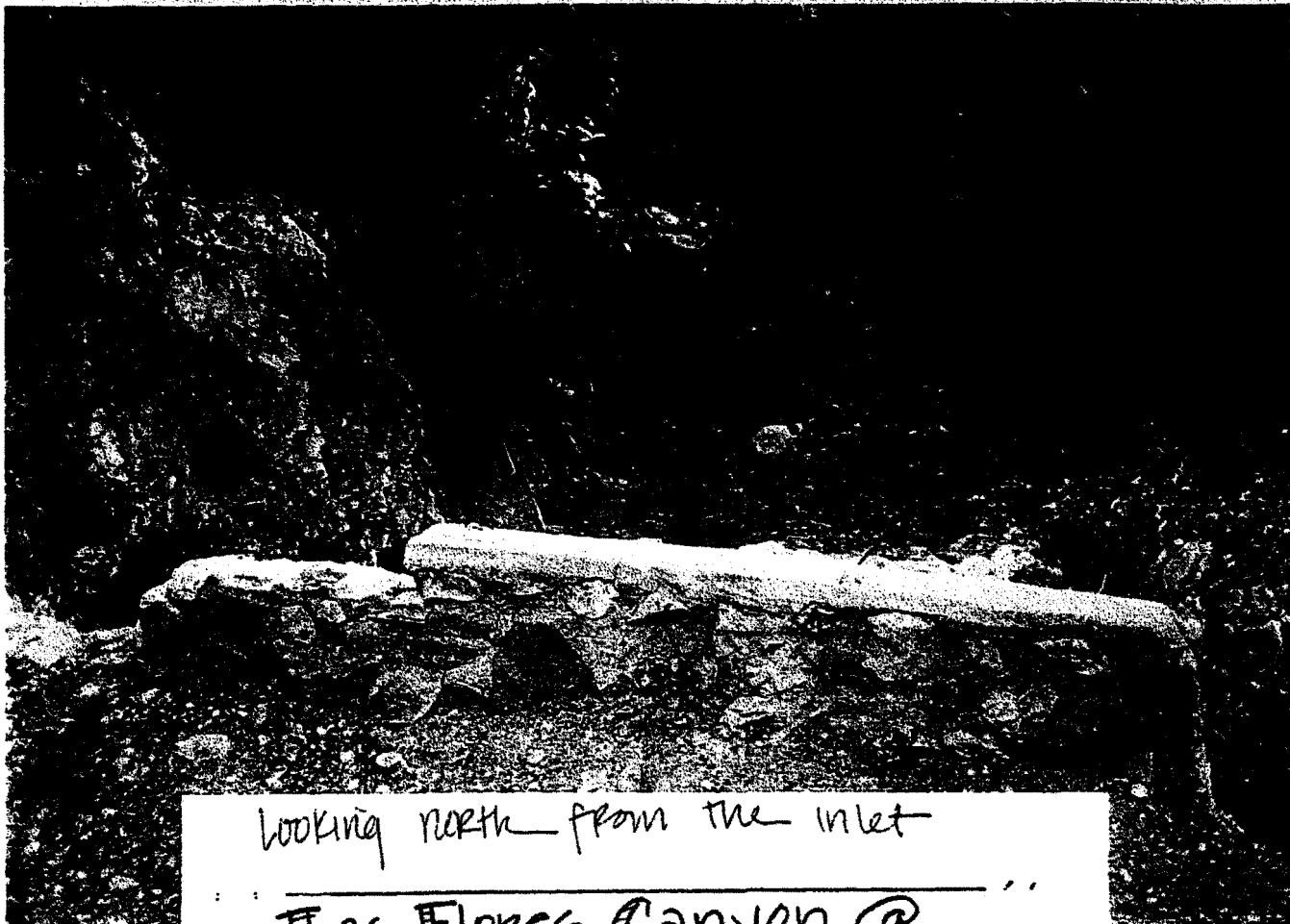
CONSTRUCTION SYMBOLS

- INDICATES WORK PER CONSTRUCTION LEGEND.
- A3-6 ABOVE LINE: INDICATES THE TYPE OF STANDARD OR THICKNESS OF SURFACE MATERIAL IN INCHES.
- BELOW LINE: REFERENCE TO DETAIL OR DETAIL & MIN THICKNESS OF BASE MATERIALS IN INCHES.

TWO DAYS BEFORE YOU BID		APPROVED BY: LA COUNTY DEPARTMENT OF PUBLIC WORKS		COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS	
CALL USA TOLL FREE		BY: [Signature]		LAS FLORES CANYON ROAD	
1-800-422-4133		BY: [Signature]		AT M.M. 1.98	
		BY: [Signature]		CASH CONTRACT NO. 7129	
		BY: [Signature]		SHEET 1 OF 3	

EXHIBIT NO. 1
APPLICATION NO.

4-95-187



Looking north from the inlet

Las Flores Canyon @
Mile Marker 1.98

Looking from the east of the
inlet.

7/95

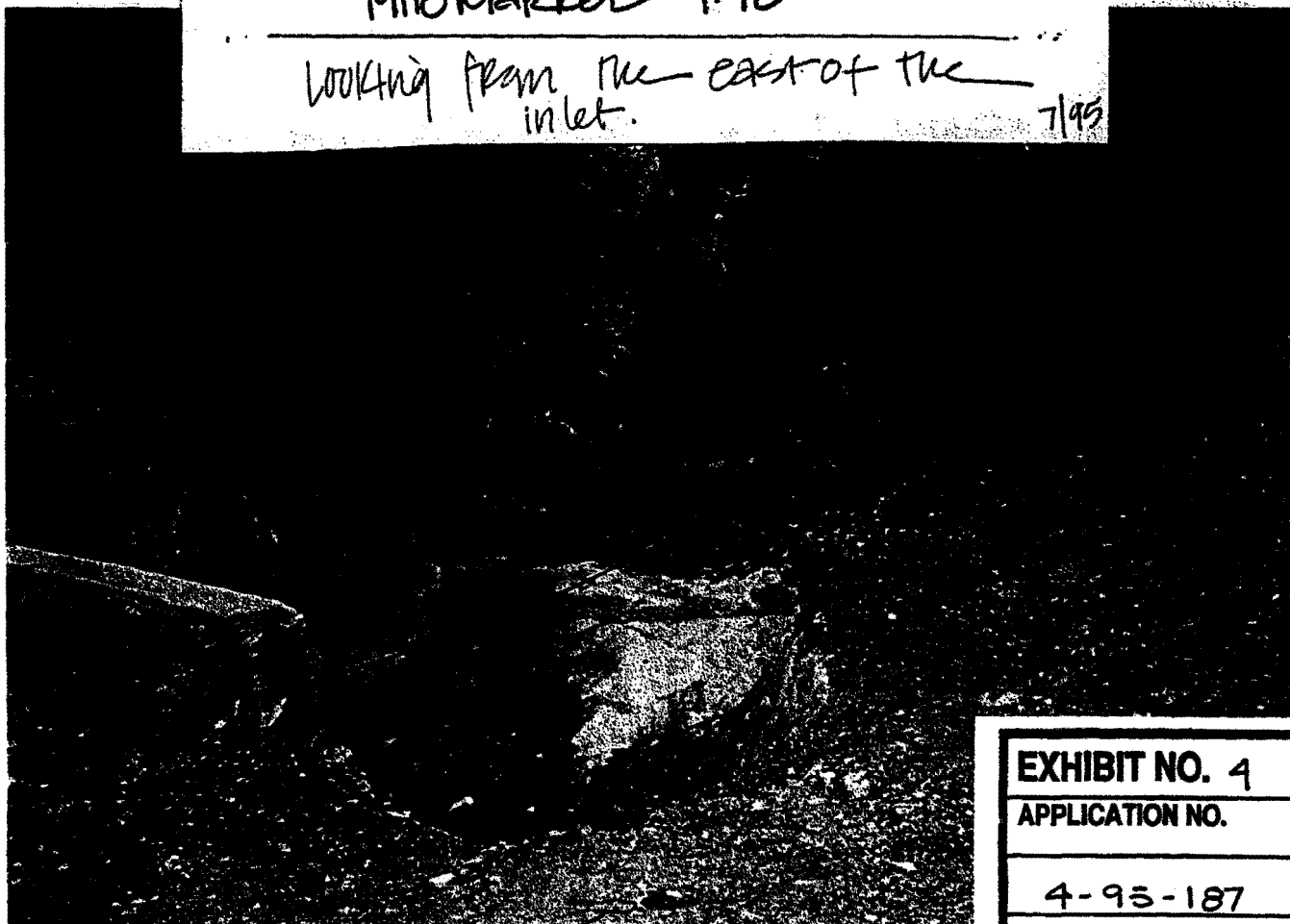


EXHIBIT NO. 4

APPLICATION NO.

4-95-187



Looking at the
inlet conveying
flows under Las Flores
Canyon Road 7/95

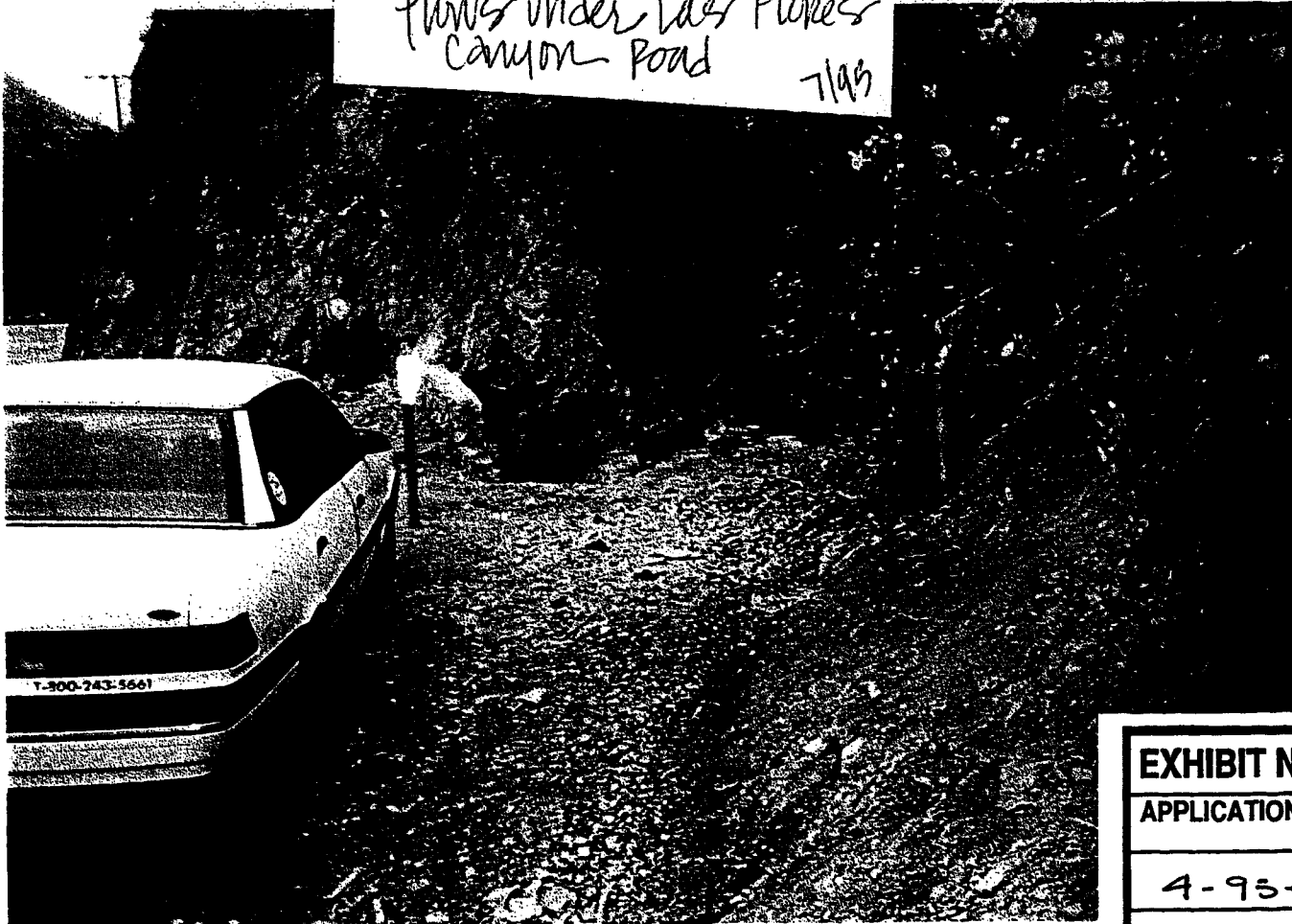
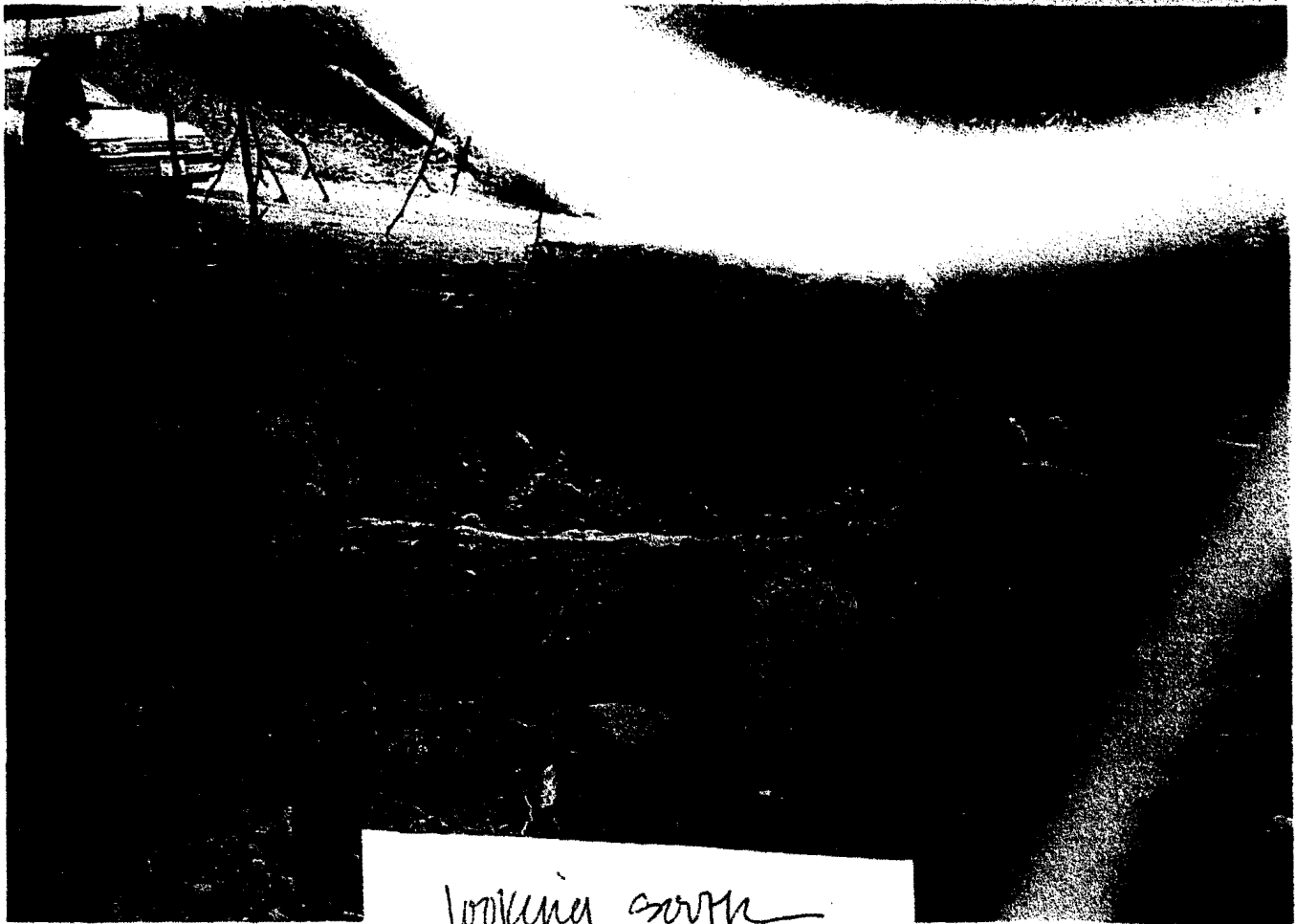


EXHIBIT NO. 3

APPLICATION NO.

4-95-187



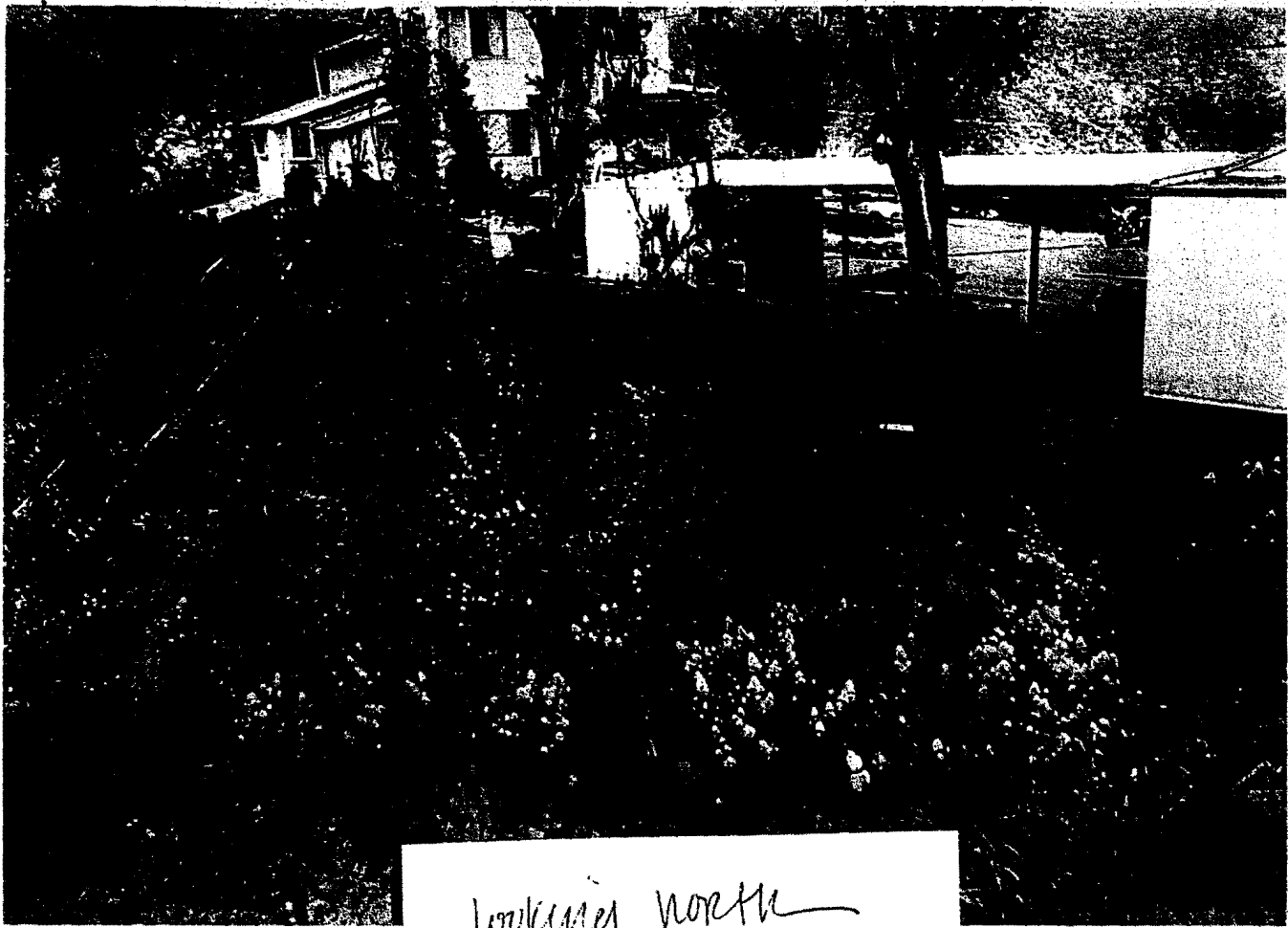
looking south
conveying flows
underneath lac places
road 7/95



EXHIBIT NO. 6

APPLICATION NO.

4-95-187



Looking north
at outlet towards
Las Flores Road

7/99

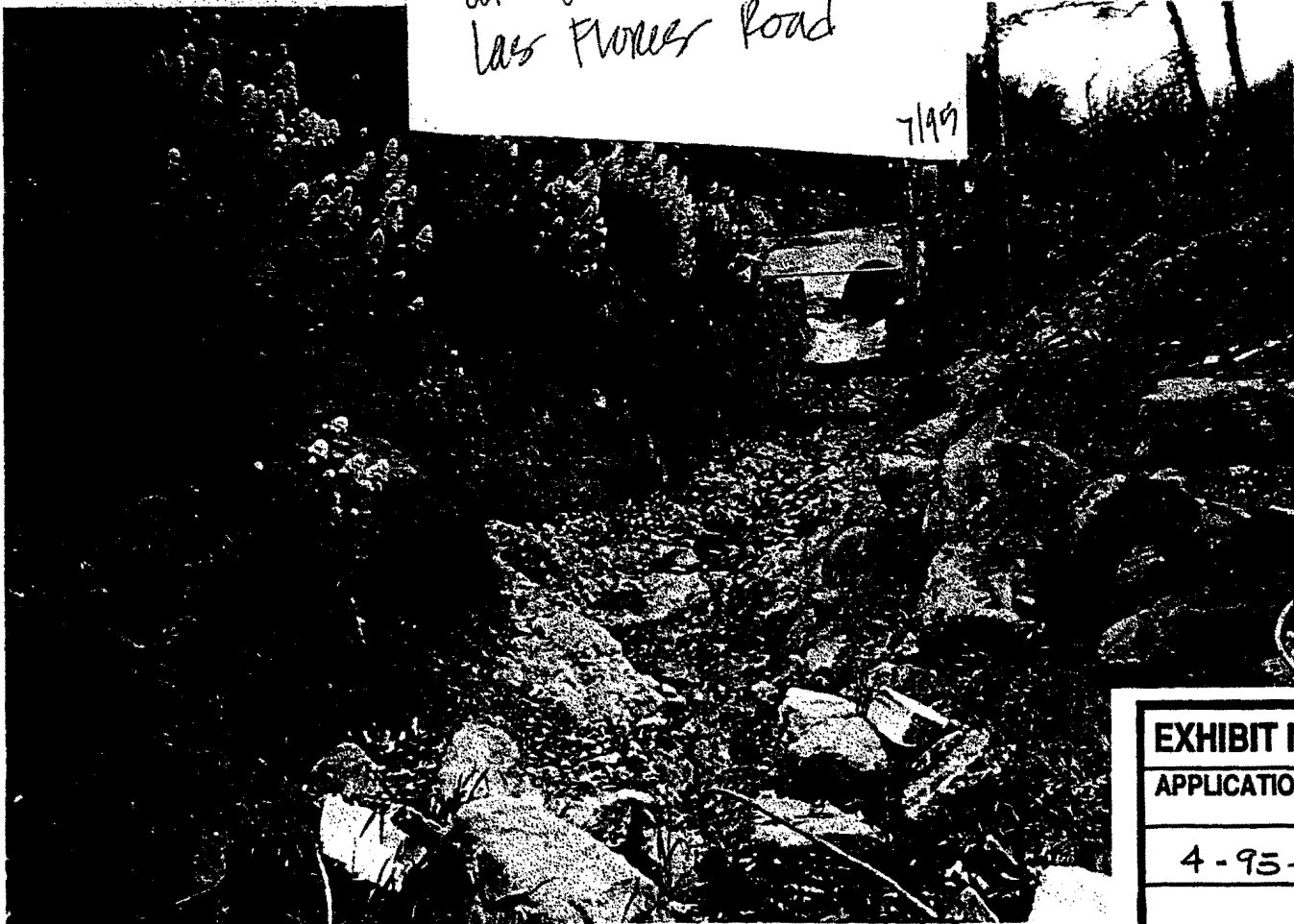
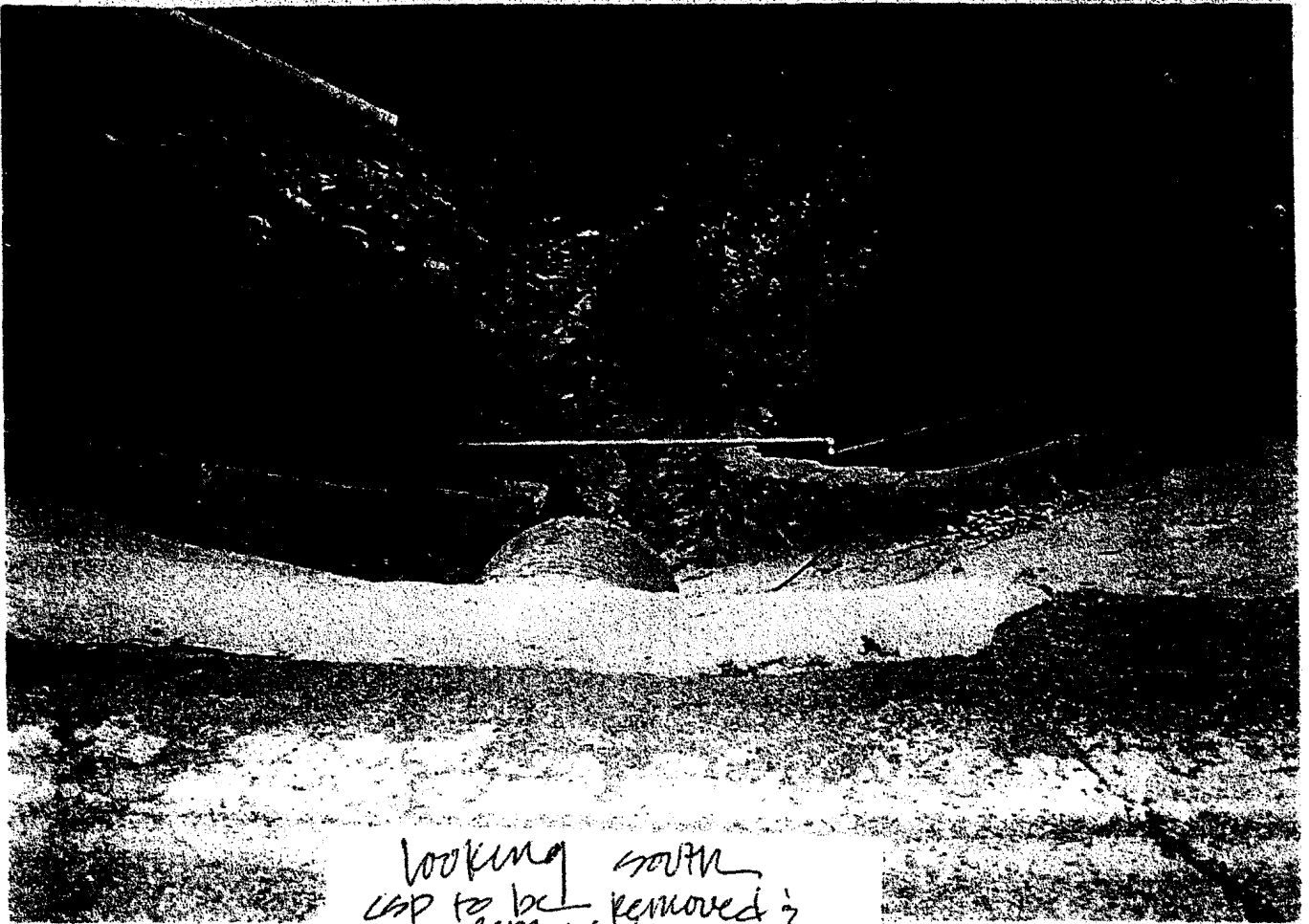


EXHIBIT NO. 7

APPLICATION NO.

4-95-187



Looking south
cap to be removed &
replaced

Looking south from
Las Flores Canyon

7/95

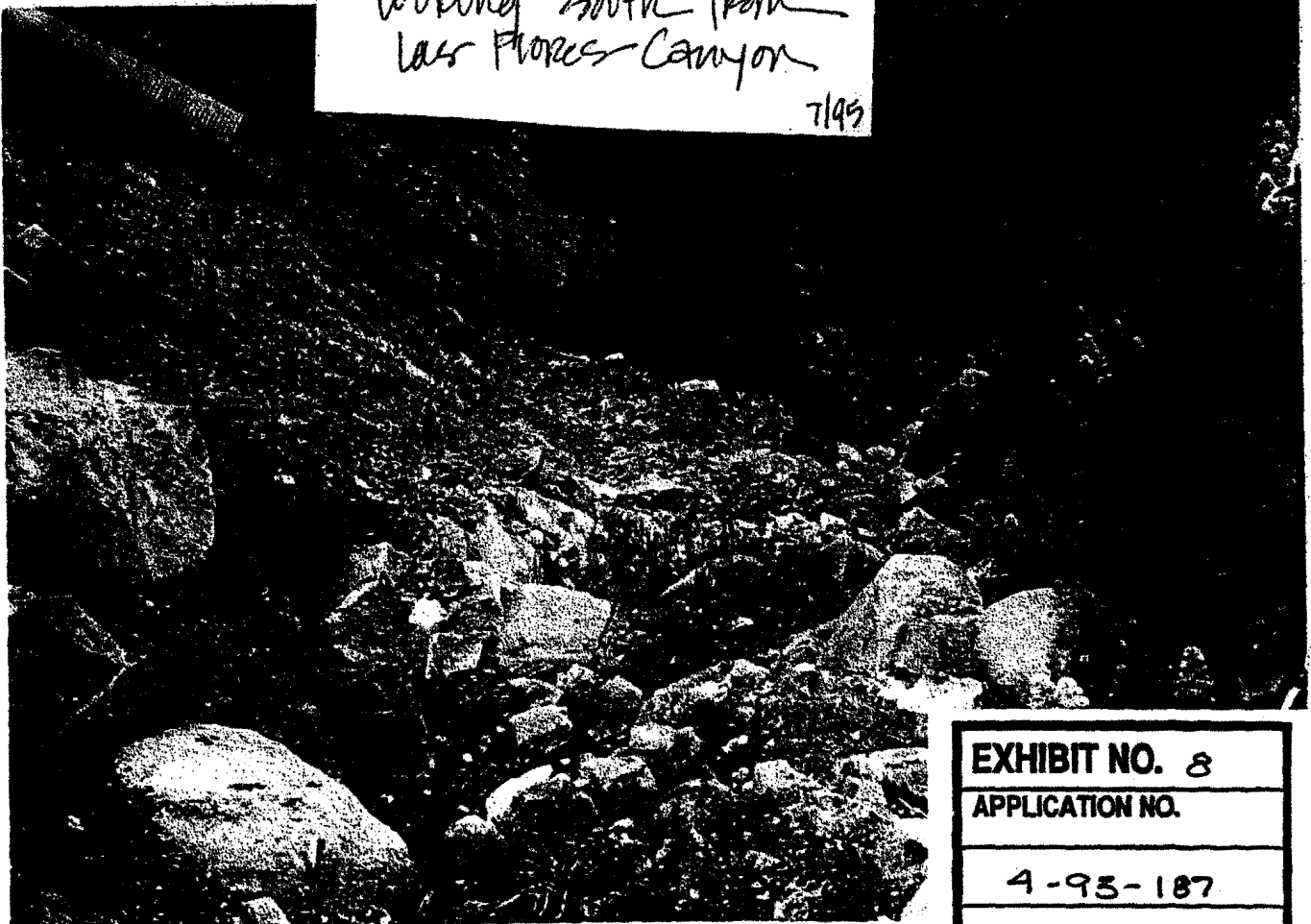


EXHIBIT NO. 8

APPLICATION NO.

4-93-187

existing CSP
to be removed

7/10/15

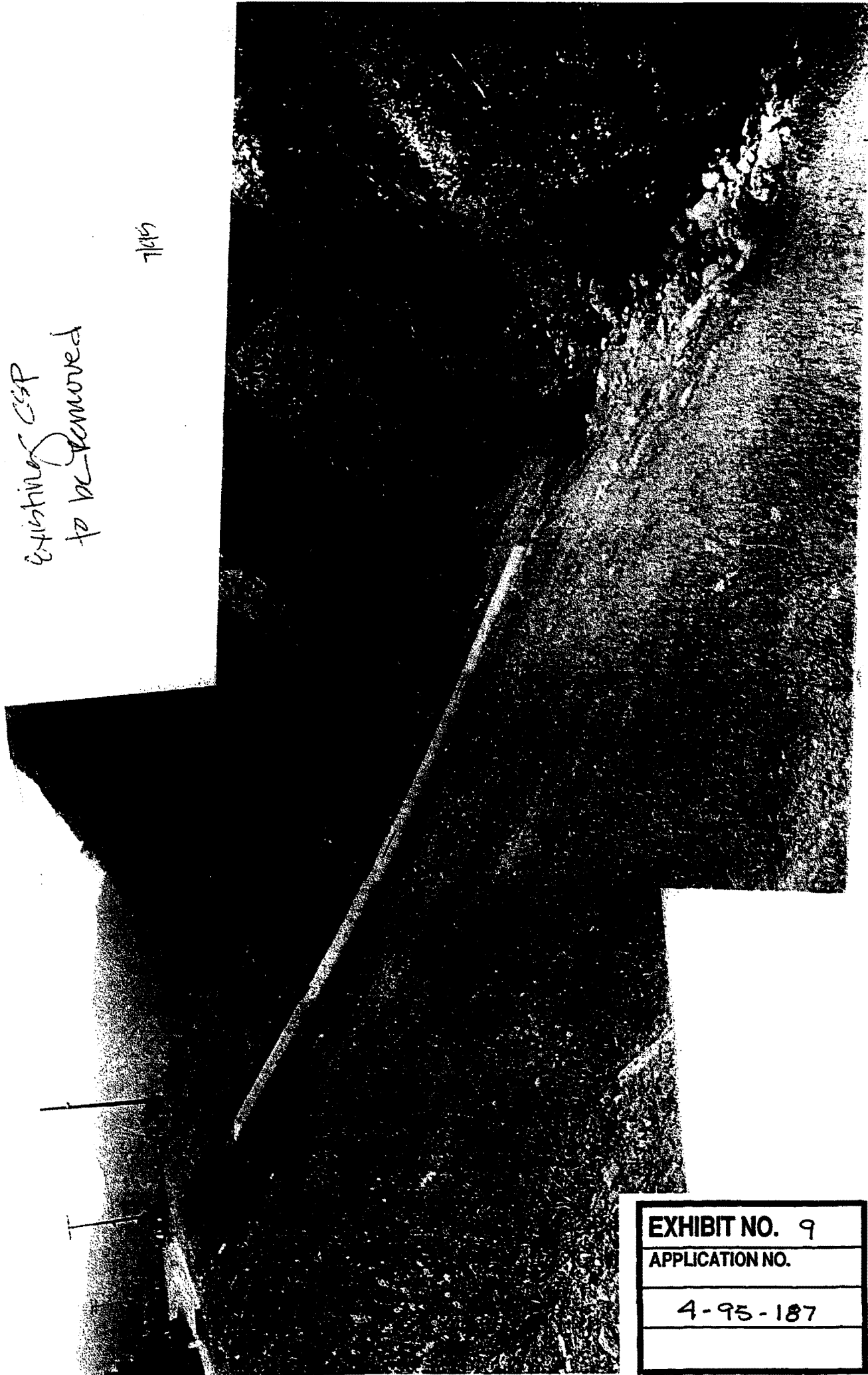


EXHIBIT NO. 9

APPLICATION NO.

4-95-187

