

*M 16c***CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
200 Oceangate, 10th Floor  
Long Beach, CA 90802-4302  
(562) 590-5071

Filed: 7/18/97  
49th Day: 9/5/97  
180th Day: 1/14/98  
Staff: MV-LB  
Staff Report: 9/18/97  
Hearing Date: 10/7-10/97  
Commission Action:

**STAFF REPORT: PERMIT AMENDMENT**

APPLICATION NO.: 5-92-368 A1

APPLICANT: Hoag Memorial Hospital Presbyterian

AGENT: Peri Muretta

PROJECT LOCATION: One Hoag Drive, Newport Beach, Orange County  
(formerly 4000 West Coast Highway)

**DESCRIPTION OF PROJECT PREVIOUSLY APPROVED:**

Installation of two gas flare "bubbler" scrubber tanks and relocation of the existing gas flare stack. The scrubber tanks were approved to be 24 feet high and the gas flare stack 31 feet high. Also approved was the replacement, in the same location, of an exiting gas line between Well #5 and the existing gas valves, including excavation of a 12-inch wide, 36 - 42 inch deep trench (10 cubic yards of cut and 2 cubic yards of fill). The project was proposed to remove sulfur compounds as required by the Southern California Air Quality Management District.

**DESCRIPTION OF AMENDMENT:**

Relocation and upgrade of an existing methane gas elimination system consisting of two 32 feet high gas scrubber units, a 35 foot high gas flare stack, two blower units, and replacement of gas lines to all existing wells. The proposed project would relocate the flare 1,000 feet away from the child care facility. Additional features of the proposed system include: monitoring systems; a second blower package which will provide backup capability; enclosure of the flare so that the flame is not observed when flaring is required; and increased capacity for methane gas scrubbing.

**LOCAL APPROVALS RECEIVED:**

City of Newport Beach Approval in Concept No. 1026-97.

SUBSTANTIVE FILE DOCUMENTS: Coastal Development Permit 5-92-368 (Hoag); Coastal Development Permit 5-93-253 (Hoag); Development Agreement D-5-93-2 between Hoag Hospital and the City of Newport Beach; City of Newport Beach certified Land Use Plan.

**PROCEDURAL NOTE:** The Commission's regulations provide for referral of permit amendment requests to the Commission if:

- 1) The Executive Director determines that the proposed amendment is a material change,

2) Objection is made to the Executive Director's determination of immateriality, or

3) the proposed amendment affects conditions required for the purpose of protecting a coastal resource or coastal access.

If the applicant or objector so requests, the Commission shall make an independent determination as to whether the proposed amendment is material. 14 Cal. Admin. Code 13166.

#### SUMMARY OF STAFF RECOMMENDATION:

The staff recommends that the Commission determine that the proposed development with the proposed amendment, subject to the conditions below, is consistent with the requirements of the Coastal Act. Staff is recommending two special conditions. The first requires that measures to address soil corrosivity at the site be implemented as proposed. The second special condition requires that landscaping to screen the view from West Coast Highway be implemented as proposed.

#### STAFF RECOMMENDATION

##### I. APPROVAL

The Commission hereby grants an amendment to the 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 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. SPECIAL CONDITIONS:

###### 1. Corrosion Control Measures

All recommendations for corrosion control contained in the Soil Corrosivity Study prepared by M. J. Schiff & Associates dated December 6, 1995 shall be implemented as part of the project.

###### 2. Landscaping Screen

Landscaping around the proposed gas elimination system shall be implemented as proposed in the landscaping plan prepared by the Office of William Rabben, dated 6/11/97. Minor deviations to the approved plan may occur provided the landscape screen remains effective.

### III. FINDINGS AND DECLARATIONS:

#### A. Amendment Description

The applicant proposes the relocation and upgrade of an existing methane gas elimination system. The proposed system is comprised of two 32 feet high gas scrubber units, a 35 foot high gas flare stack, two blower units, and replacement of gas lines to all existing wells.

Methane gas occurs naturally below the surface of the Hoag Hospital site and the Balboa Coves community directly across Coast Highway from the hospital site. The gas becomes hazardous if allowed to accumulate. It is believed that the original source of the gas is naturally occurring from the oil fields located approximately four miles north of Hoag's facility.

There is an existing gas collection and burn-off system at the site. It collects the gas from both the Hoag site and the Balboa Coves area. The purpose of the existing flare is to prevent combustible gas accumulation. The purpose of the proposed scrubber system is to reduce the concentration of sulfur compounds being emitted. The Southern California Air Quality Management District (SCAQMD) has stated that shutting down the flare would result in the accumulation and seepage of explosive gases in the residential neighborhoods and public streets near the hospital. The area has a history of residential fires associated with gas seepage from the ground.

The proposed project would remove sulfur compounds, principally hydrogen sulfide, to a level of 5.0 ppm from approximately 4,000 ppm in the existing feedstock gas. Under the current system, the gas burned in the flare is untreated (no removal of sulfur compounds) before burning and has a sulfur content substantially beyond the limits which are acceptable to the SCAQMD. In addition, the existing flare is located 140 feet west of Hoag's on-site child care center.

On February 18, 1993, the Commission approved coastal development permit 5-92-368 which allowed an upgrade to the existing system. That permit was approved with two special conditions. The first special condition required that construction methods be employed that would not adversely impact the wetlands that previously existed at the site. (Note: Coastal development permit 5-93-253 allowed grading that resulted in the elimination of the wetlands. The hospital expansion that was approved under the master plan was found to be an incidental public service and adequate mitigation for the loss of the wetlands was provided off-site.) The second special condition required the applicant to provide screening around and adjacent to the gas elimination system to soften views from West Coast Highway toward the project.

Development approved under the original permit was commenced prior to expiration of the permit but was not completed. The previously approved upgrade would have removed the sulfur compounds with wet chemical scrubber tanks. The methane gas would then have been flared or put to use by the hospital to produce a portion of the hospital's heating and cooling needs.

After the coastal development permit had been issued, the City of Newport Beach stopped work on the project and requested modifications to the approved plans. Prior to work being stopped, the following components of the project

had been completed: installation of a concrete containment system and two tanks to contain scrubber chemicals; installation of a new gas extraction pipeline; and installation of new piping to connect the new manifold. The City reissued permits for the project on November 15, 1995; however, at that time, Hoag and the City were in the process of pursuing state legislation to fund the relocation of the flare and to install a system that would better meet the needs of the West Newport area by more efficiently extracting methane gas. The amendment application now before the Commission is for that upgraded system.

The proposed project would relocate the flare 1,100 feet away from the child care facility. In addition, the proposed system will be able to collect the methane gas as needed for future development on Hoag's Lower Campus (Development Agreement D-5-93-2 between Hoag Hospital and the City of Newport Beach approved the master plan for future development of Hoag's Lower Campus. The development agreement was approved by the Commission on February 15, 1993). Additionally, the proposed system will have a new scrubber system chemistry which involves using nonhazardous dry chemicals as opposed to hazardous wet chemicals. Further, the proposed system will have increased pumping capabilities enhancing gaseous flow to the main hospital complex located on the Upper Campus, for energy utilization. Monitoring systems have also been added to the proposed project for increased safety and to allow monitoring of gaseous flows from each of the three on-site wells, as well as the two off-site trenches.

The benefits of the proposed project over the existing and previously approved project include: gas utilization for energy generation; the proposed scrubber system will use nonhazardous chemicals to remove the sulfur compounds from the gas whereas the previously approved system would have used wet chemicals which could constitute a risk of hazardous chemical spill; the flare will be relocated 1,100 feet from the child care center; and, the proposed project will allow compilation of gas production records on individual project components, where the existing and previously approved systems would not. In addition, the proposed system contains a second blower package which will provide backup capability to the system in the event of failure of the main blower; the proposed system includes enclosure of the flare so that the flame is not observed when flaring is required; enclosure of the flare will also enhance combustion efficiency; and the proposed project includes a system that has an increased capacity for methane gas scrubbing.

#### **B. Hazards**

Section 30253 of the Coastal Act states, in part:

New development shall:

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

(3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.

In the past, concern has been raised that an earthquake fault is located at the subject site. This was raised at the Commission hearing on the original coastal development permit, 5-92-368. Also raised at that time were issues of soil corrosivity and the presence of hazardous gases at the site. Much of the concern expressed at the time was based on information contained in the EIR prepared for the Hoag Master Plan. However, additional information, some of which was incorporated into the EIR, has provided clarification.

## 1. Faulting

The applicant has submitted a Summary of Fault Investigation, Lower Campus, Hoag Hospital, prepared by Leighton and Associates, Inc. on October 21, 1996. The Fault Investigation studied the subject site and reviewed previous reports on the geology of the area as well as aerial photographs of the site. The Fault Investigation states:

"Based on our observations of the recently cut slope and review of prior mapping along the slope before fill was placed along the east side of our study area, it is our opinion that although faults are present in the Miocene age bedrock, they do not offset earth materials younger than 11,000 years old. Therefore, the faults are not considered active under the State of California Alquist-Priolo act."

The staff report for the Commission's approval of the original permit made the following findings: "Additional consultants (Law/Crandall, Inc., January 27, 1993) point out that "detailed studies by the California Division of Mines and Geology (1988) indicate that no active or potentially active faults occur beneath the site. The studies are based on detailed review of aerial photographs and fault trenching studies by others in the site area" and "the site is not located within an Alquist-Priolo Studies Zone designated by the State of California for fault rupture."

Numerous studies of the area have not revealed the presence of an active fault at the subject site. The proposed project is required because of the need to eliminate the methane gas at the site. The proposed project will improve the existing method of removing the methane gas. The consultants have indicated that the proposed project is feasible from a geotechnical standpoint. Therefore the Commission finds that the location of the proposed project does not create significant hazard with regard to earthquake faulting.

## 2. Soil Corrosivity

The soils at the subject site have been found to be corrosive. The presence of corrosive soil means there is potential for metal pipes placed within the soil to corrode. A Soil Corrosivity Study was prepared for the subject site by M.J. Schiff & Associates, Inc. on December 6, 1995. The study found that the soil at the subject site is classified as severely corrosive to ferrous metals, aggressive to copper, and deleterious to concrete. The study contains numerous recommendations for corrosion control, including: abrasive blasting underground steel and cast and ductile iron utility piping and applying a high quality dielectric coating; bonding underground steel and iron pipe with

rubber gasketed, mechanical, grooved end, or other nonconductive type joints for electrical continuity; applying cathodic protection to steel and iron piping; and other measures. The study found that no special precautions, from a corrosion viewpoint, are required for plastic piping placed underground.

The applicant has proposed to incorporate all the recommendations for corrosion control contained in the Soil Corrosivity Study prepared by M.J. Schiff & Associates dated December 6, 1995. As a condition of approval the recommendations for corrosion control shall be incorporated into the project. This condition will assure that this aspect of the proposed project is carried through. With incorporation of the corrosion control measures included as a part of the proposed project, adverse impacts due to corrosive soils will be mitigated. Therefore, the Commission finds that as conditioned, the proposed project will not create undue hazard due to soil corrosivity.

### 3. Hazardous Gases

Methane gas occurs naturally at the subject site and vicinity. There is existing now and has been for more than 20 years, various free burning flare type devices in operation to mitigate the danger from combustible gas accumulation. The existing flare does not treat the gas before it is burned. The sulfur content of the flared gas is substantially beyond the limits set by SCAQMD. Shutting down the flare would result in the accumulation and seepage of explosive gases in the residential neighborhoods and public streets in the vicinity.

A letter from SCAQMD (attached as exhibit C) supporting the proposed project states:

"Pursuant to the California Health and Safety Code, the South Coast Air Quality Management District ("District") is the agency with primary responsibility for comprehensive air pollution control in the South Coast Basin. As such, the District believes it is in the public interest for the proposed project to obtain all necessary governmental and agency evaluations at the earliest possible date. Upon completion, the project should reduce levels of H<sub>2</sub>S in the gases going to the subject flare. This in turn, it will reduce SO<sub>2</sub> emissions after burning.

Upon completion of the upgrades, the system is expected to be more effective and reliable in its control of underground gas seepage in Hoag's vicinity. It is also in the best public interest to move the flare further away from Hoag's child care center to reduce potential human exposure to gases involved."

The methane gas that occurs naturally on the site must be safely eliminated to assure public safety in the area. Currently the gas is collected through underground vents and burned off through the exiting gas flare stack. The proposed project will be a safer, cleaner method to eliminate the naturally occurring gas. The SCAQMD has required that the improved methods be employed. Therefore, the Commission finds that the proposed project is consistent with Section 30253 of the Coastal Act which requires that new development be consistent with requirements imposed by an air pollution control district.

C. Public Views

Section 30251 of the Coastal Act states:

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 of 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.

A public view park exists in the area atop the bluff adjacent to the subject site. The view park offers a panoramic view of Newport Harbor and the ocean. There is a public bicycle trail along the bluff top, between the public park and a large condominium development.

None of the proposed development will exceed the height of the bluff. The top of the enclosed flare is proposed to be 35 feet high and the top of the gas scrubber units are proposed to be approximately 32 feet high. The top of the adjacent bluff in this area is more than 40 feet high. The maximum height for structures in this area of the approved master plan (as reflected in the development agreement) is 53 feet. Because the height of the proposed structure is lower than the height of the adjacent bluff, the proposed development will not obstruct views from the public blufftop park.

The site is also adjacent to, on the inland side of, West Coast Highway. The City's certified Land Use Plan does not identify this section of Coast Highway as a coastal scenic area. However, Coast Highway One is considered a scenic highway. The scrubber system will be visible from Coast Highway. The proposed development should avoid creating an industrial look as viewed from Coast Highway.

To minimize adverse impacts to public views from Coast Highway, the applicant has proposed to install landscaping around the scrubber system to screen it from view. The landscape plan submitted by the applicant includes trees that will grow to maximum heights of 30 to 40 feet with spreads ranging from 20 to 40 feet. The types of trees proposed are Red Flowering Gum, New Zealand Christmas Tree, Cajeput Tree, and Jacaranda. In addition, the applicant has proposed to include the following shrubs in the landscaping plan: Canberra Gem Grevillea, Sweet Scented Hakea, and Myporum. The landscaping is proposed on all sides of the scrubber system except at the access point from the parking lot (see exhibit E). As a condition of approval the proposed landscaping shall be incorporated into the project. This condition will assure that this aspect of the proposed project is carried through. With implementation of the landscaping assured as a part of the proposed project, adverse impacts to public views will be mitigated. Therefore, the Commission finds that as conditioned, the proposed project is consistent with Section 30251 of the Coastal Act regarding public views.

D. Local Coastal Program

Section 30604(a) of the Coastal Act provides that a coastal development permit shall be issued only if the proposed development would not prejudice the ability of the local government having jurisdiction to prepare a local coastal program (LCP) which conforms with, and is adequate to carry out, the Chapter 3 policies of the Coastal Act.

The Newport Beach LUP was certified on May 19, 1982. The proposed development is consistent with the certified Land Use Plan land use designation for the site. The proposed development, as conditioned, has been found to be consistent with the Coastal Act, including the hazard and public views policies of the Coastal Act. Therefore, the Commission finds that the proposed development would not prejudice the ability of the City of Newport Beach to prepare a local coastal program consistent with the Chapter 3 policies of the Coastal Act.

E. California Environmental Quality Act

Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements 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.

The project as conditioned has been found to be consistent with the Chapter 3 policies of the Coastal Act, including the public views and hazard policies of the Coastal Act. In addition, the proposed project will improve the air quality in the vicinity by substantially reducing the sulfur content released into the air by the gas flare. Further, the project will upgrade the existing system which prevents hazardous gases from accumulating. There are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.





Subject Site

EXHIBIT NO. A
APPLICATION NO.
5-92-368A1
California Coastal Commission

# VICINITY MAP

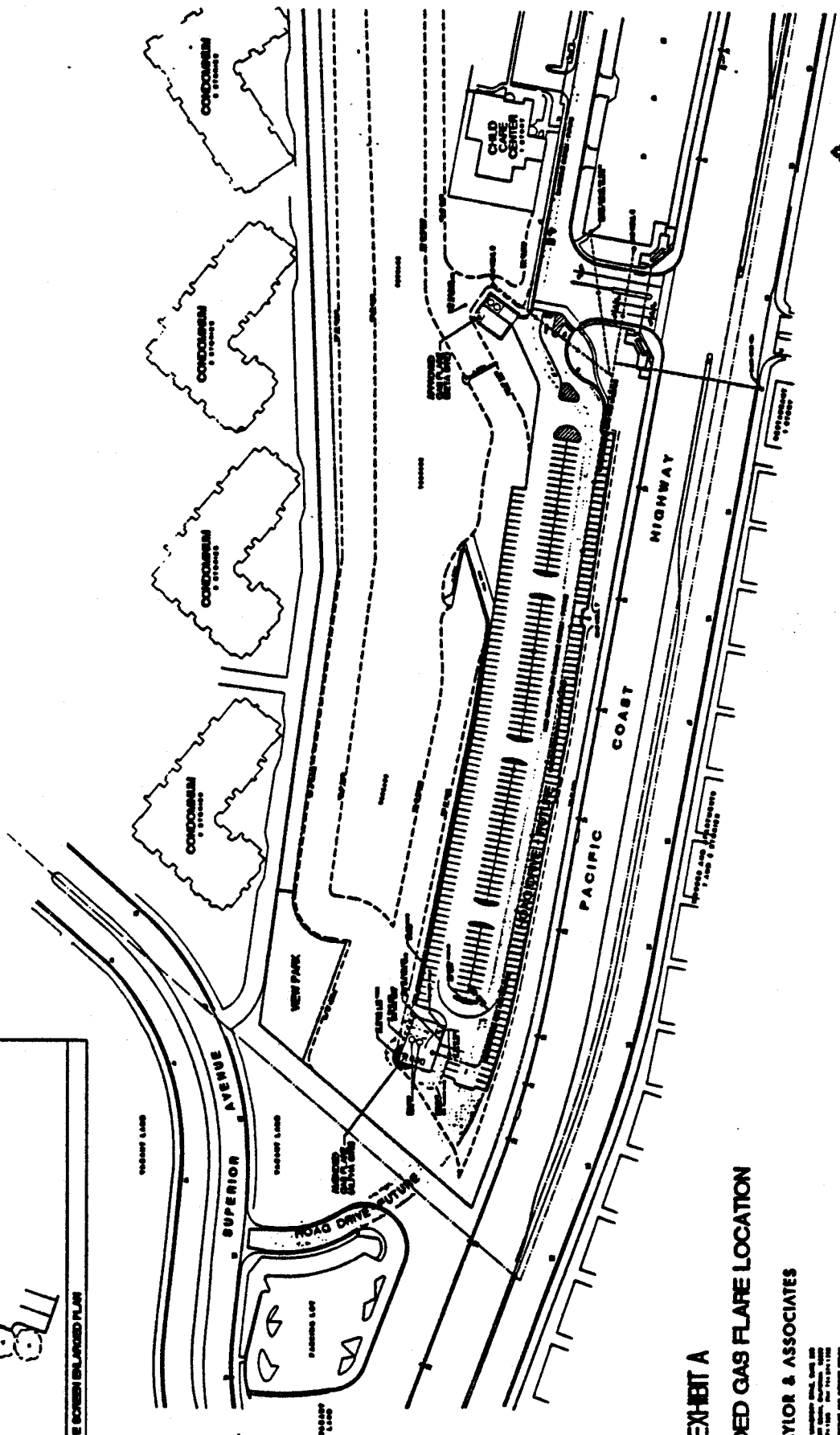
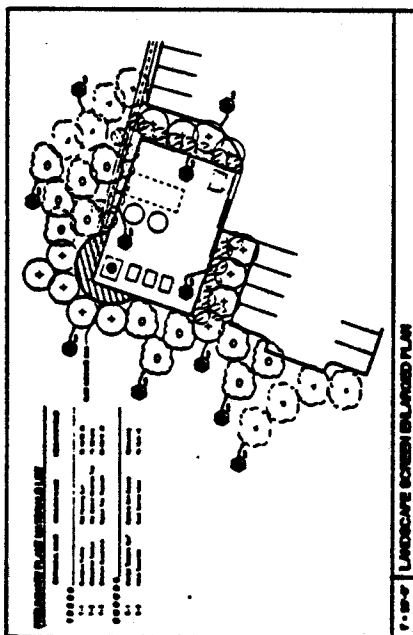


Exhibit B  
5-92-368 A1  
Site Plan

**EXHIBIT A**  
**SITE**  
**AMENDED GAS FLARE LOCATION**  
**TAYLOR & ASSOCIATES**



# South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • <http://www.aqmd.gov>

RECEIVED  
JUL 21 1997

CALIFORNIA  
COASTAL COMMISSION

July 18, 1997

*Via Facsimile and Mail*

Meg Vaughn, Staff Analyst  
California Coastal Commission  
200 OceanGate, 10th Floor  
Long Beach, CA 90802-4302

Re: Hoag Memorial Hospital Presbyterian;  
Flare Relocation and Installation of Control Equipment;  
Coast Development Permit  
Amendment Application #5-92-368A1

Dear Ms. Vaughn:

The purpose of this letter is to request that the California Coastal Commission expedite, to the maximum extent possible, its review and evaluation process regarding Hoag Memorial Hospital Presbyterian's ("Hoag") project to relocate and improve its gas flare and install air pollution control equipment to clean the flared gases.

Pursuant to the California Health and Safety Code, the South Coast Air Quality Management District ("District") is the agency with primary responsibility for comprehensive air pollution control in the South Coast Basin. As such, the District believes that it is in the public interest for the proposed project to obtain all necessary governmental and agency evaluations at the earliest possible date. Upon completion, the project should reduce levels of H<sub>2</sub>S in the gases going to the subject flare. This, in turn, it will reduce SO<sub>2</sub> emissions after burning.

Upon completion of the upgrades, the system is expected to be more effective and reliable in its control of underground gas seepage in Hoag's vicinity. It is also in the best public interest to move the flare further away from Hoag's child care center to reduce potential human exposure to gases involved.

The District joins Hoag in its request that your commission hear this matter at its next scheduled hearing. By expediting this matter, it should speed the installation of control equipment, reduce emissions of air contaminants and promote public health and safety.

Exhibit C  
5-92-368 A1  
AQMD Letter

p. 1/2

If you have any questions, please contact Allen Mednick at (909) 396-3461. Thank you for your cooperation

Very truly yours



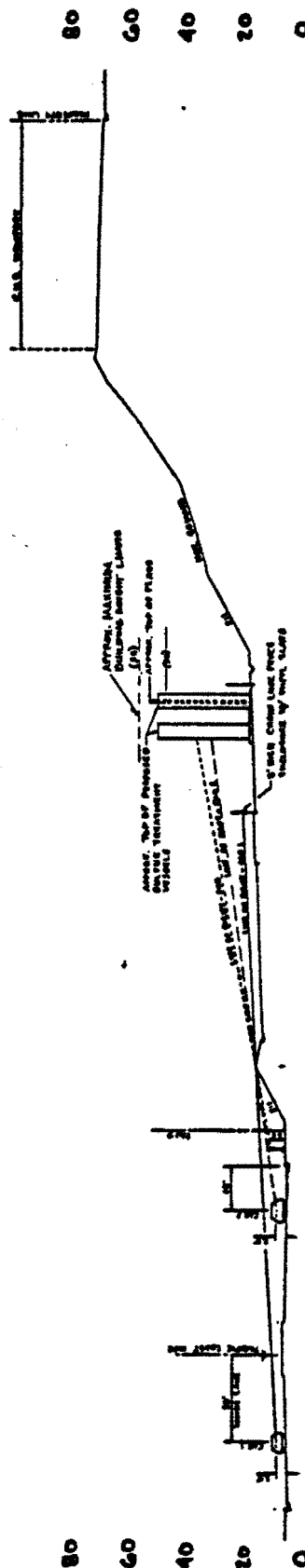
Larry Rhinehart  
Director of Intergovernmental Affairs

ADM:prt

a:\hoaghosp.doc

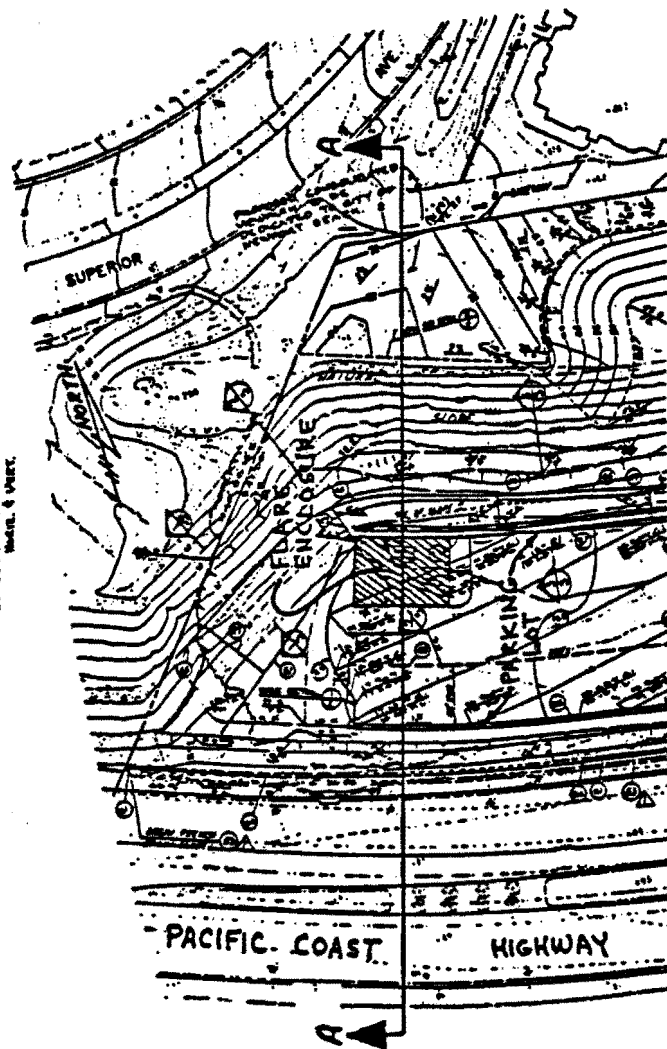
cc: Dennis O'Neil, Esq.  
Peter Faulke, Vice President  
Peri Muretta, Consultant  
Lupe Valdez  
Peter Mieras

Exhibit C  
5-92-348 A1  
AGMD Letter  
p. 2/2



SECTION A-A

SCALE: 1" = 20'  
HORIZ. & VERT.

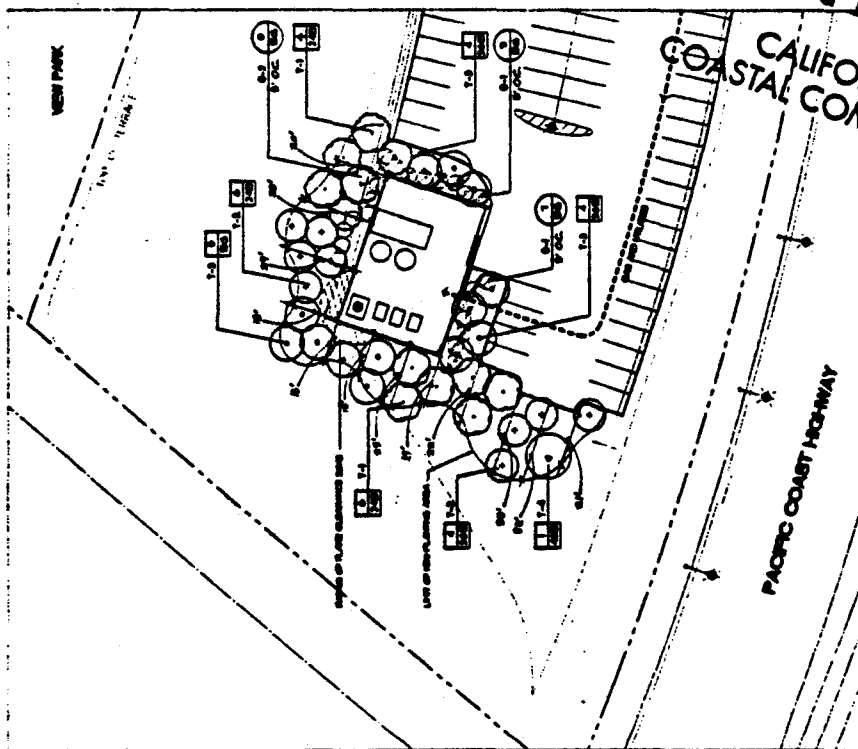
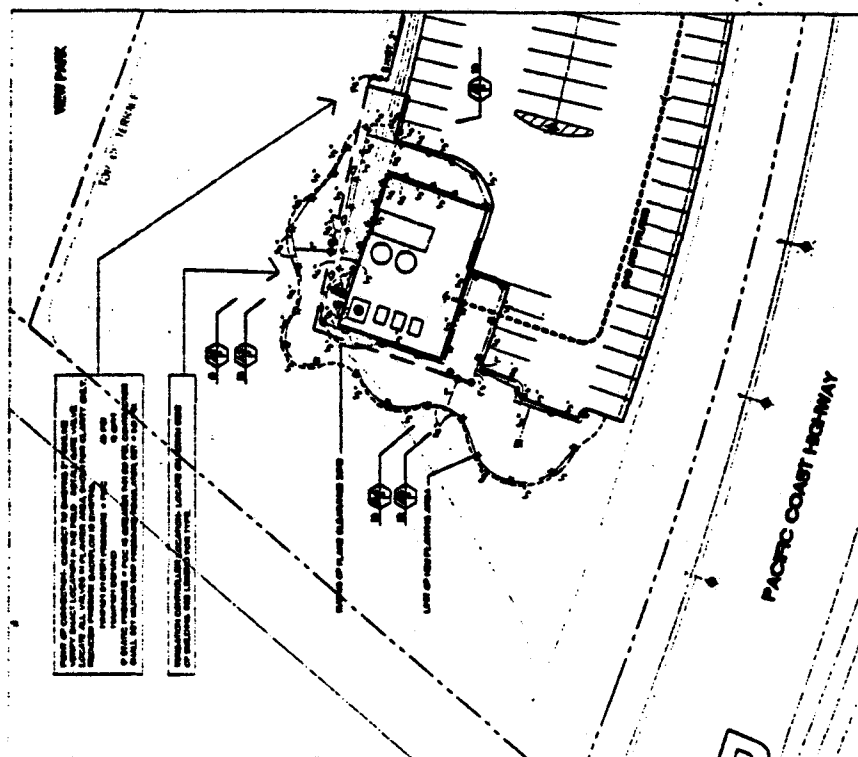


PLAN

SCALE: 1" = 40'

SIGHT VIEW SECTIONS  
GAS SULFUR TREATMENT SYSTEM  
(NORTHWEST CORNER PARKING LOT)  
HOAG LOWER CAMPUS  
MAY 30, 1997  
H17-100-24

Exhibit D  
5-92-368 A1  
View Analysis



## IRRIGATION PLAN

## PLANTING PLAN

RECEIVED  
AUG 15 1997  
CALIFORNIA  
COASTAL COMMISSION

[illegible][illegible]

NOTE:

1. USE PUMP-UP VALVES WITH TIGHT SEAL. 1-IN. ORANGE VALVES CHECK LOW PRESSURE INCREASED FLY OCCURS.
2. USE ADJUST OR SPRING OPERATIVE WITH HINDING WITH LOW PRESSURE INCREASED FLY OCCURS.
3. LOCATE ALL VALVES IN SPRING AREA. SPRING PRESS. CHECK.

## Landscape Plan

Exhibit E

5-92-368-A1

COASTAL DEVELOPMENT PERMIT AMENDMENT  
5-92-368 A1  
LETTERS RECEIVED IN OPPOSITION

EXHIBIT F

**NEWPORT BEACH TOWNHOUSE OWNERS' ASSOCIATION**

**C/O Gill Management  
2872 West DeVoy Drive  
Anaheim, California 92804**

**September 1, 1997**

**California Coastal Commission  
Attn.: Meg Vaughn  
South Coast Area Office  
200 Oceangate, 10th Floor  
Long Beach, California 90802-4302**

**RECEIVED**  
**SEP 5 1997**  
**CALIFORNIA  
COASTAL COMMISSION**

**Re: Permit Application 5-92-368-AI**

**Dear Meg;**

**On behalf of Newport Beach Townhouse Owners' Association, I must strongly protest the proposed relocation of the methane gas flare stack. The proposed site is right by our twenty-eight homes. Our homes look directly at that bank, and further would be negatively impacted by the sulfur and methane smell as we are directly downwind.**

**These emissions would come in the only ventilation windows in two of three bedrooms in our homes. The authorization to place the burner as proposed would make it unsafe to open the windows in our homes.**

**We beseech the commission to not allow this change to be approved on this calendar.**

**Our community has been very hard hit with the widening of the coast highway (we lost our entrance and parking), we lost 125 feet of seawall in a catastrophic uninsured loss. The resulting increased highway noise levels coupled with the assessments for repairs to the seawall and six homes damaged by the loss, have made it almost impossible for owners to sell their homes. Many let their units go back to their lender, others have had no choice but to rent them out.**

**PLEASE, our community can not take the additional stigma of hazardous, smelly emissions.**

**Your help on this will be greatly appreciated.**

**Sincerely,**



**Allyson Bolin  
Vice President**

**cc: Homeowners**

*Exhibit F*



Tuesday, September 02, 1987

Meg Vaughn  
California Coastal Commission  
P.O. Box 1450  
200 OceanGate, 10th Floor  
Long Beach, CA 90802-4418

Dear Meg Vaughn:

I received a hearing notice reference permit #5-92-368-A1 applied for by Hoag Memorial Hospital. This project is of vast concern to the residents of West Newport Beach as it will DIRECTLY impact our quality of life. The project consists of relocating an existing methane gas elimination system which emits obnoxious odors similar to rotten eggs. The system is operating in its current location and has been for the 5 years that I have lived in the area without any public indication of health risks. The same modifications to promote public health and safety can also be made where it is now located.

In its current location it impacts a minimum number of residents and any relocation will have a much wider impact on the community affecting significantly greater numbers of people. I strongly urge that this project not be allowed. The day center described in their request operates 5 days a week 8-10 hours per day providing day care for the children of hospital employees. Its relocation will transfer that exposure to a multitude of families 24 hours a day seven days a week. The fumes will blow directly into two of my three bedrooms where my grandchildren sleep and play and be located less than 100 yards away from my home.

I object to being notified of such an important issue less than two weeks before the actual hearing. It is also unreasonable to conduct a hearing on such an important issue at the opposite end of the state where the project is to be located. It is extremely difficult for local opposition to attend without significant expense and extreme inconvenience. It is also obvious that this works to the advantage of the Hospital.

I can't imagine what possessed someone to think that this issue should be on a consent calendar. The only one consenting is the Hospital again along with its political supporters. It is requested that this project be removed from the consent calendar.

It is requested that this hearing be transferred to Newport Beach where local residents can attend and be represented.

It is requested that at least two weeks notice be given prior to a new hearing.

It is requested that this project not be allowed until a fair, impartial, and reasonable hearing can be conducted. These requests are certainly reasonable and anything less would certainly taint the California Coastal Commission's objectivity in deciding these important public issues.

Sincerely,



William Miller

Resident at: 4405 West Coast Highway  
Newport Beach, CA 92863  
(714)646-8212

Exhibit F<sub>2</sub>

L. G. FALCONER  
P. O. BOX 924  
Seal Beach, CA 90740

714-673-4943

FAX 675-8580

DATE: September 2, 1997

Page 1 of 3

FAX # 562-590-5084TO: CALIFORNIA COSTAL COMMISSIONATTN: MEG VAUGHNRE: #1-92-368-A1 - APPLIED FOR BY HOAG MEMORIAL HOSPITAL

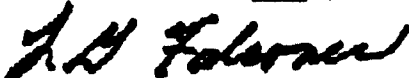
DEAR MS. VAUGHN:

THE HEARING ON THE ABOVE PERMIT TO RELOCATE THE METHANE GAS ELIMINATION WOULD HAVE A DANGEROUSLY ADVERSE EFFECT ON THE RESIDENTS OF WEST NEWPORT BEACH.

THE ODOR WOULD BE COMING IN THE WINDOWS WHERE PEOPLE LIVE. IN OUR CONDOMINIUM COMPLEX THE BEDROOMS ARE TO THE STREET AND COMBINED WITH THE NOISE FROM COAST HIGHWAY IT WILL BE ALMOST IMPOSSIBLE FOR PEOPLE TO RESIDE IN THE COMFORT WHICH WE HAD THE RIGHT TO EXPECT WHEN PURCHASING PROPERTY IN THIS AREA.

WE HAVE SUFFERED THE FAILURE OF OUR SEA WALL AND DAMAGE TO SIX HOMES WHICH HAS BEEN EXTREMELY COSTLY. IF THE COMMISSION SHOULD ALLOW THIS PERMIT IT WILL LEAVE OUR PROPERTY LESS THEN DESIRABLE AND HAVE NO VALUE. THIS WOULD BE A VERY GRAVE INJUSTICE TO ALL RESIDENTS IN WEST NEWPORT.

IT IS OF GREAT CONCERN WHY THIS HEARING IS BEING HELD HUNDREDS OF MILES FROM NEWPORT SO IT IS NOT FEASIBLE FOR THE RESIDENTS AFFECTED TO ATTEND AND WHY THE SHORT NOTICE OF SUCH A CRITICAL MATTER??



L. G. FALCONER  
NEWPORT TOWNHOMES

Exhibit F<sub>3</sub>

September 03, 1997

Meg Vaughn  
California Coastal Commission  
200 OceanGate, 10th floor  
Long Beach, CA 90802-4416

RE: Hearing notice reference permit #5-92-358-A1

Dear Meg Vaughn,

I have a serious objection to the above-mentioned permit submitted by Hoag Memorial Hospital. I recently purchased a townhouse in West Newport Beach, 100% unaware of any such proposals. The proposed site is near my house and I feel that it will have a detrimental effect on our community. The nearby area is saturated with children and they will be negatively impacted by the sulfur and methane smell released by the gas flare stack. If I was aware of such a move, I would not have invested my life savings into this house. I do not have the choice of relocating and believe that big business is getting their way, at the cost of individuals.

Due to our close proximity to the new proposed site, our homes will be directly affected by the move. The annoyance of the "Stench" will place extreme difficulty on the surrounding community. The relocation will dramatically increase the number of people affected by the fumes. The proposed move does not make sense and I would like to open this issue for discussion. Unfortunately, we were only recently informed of the move and have not had ample time to respond to the proposal. I plead with you and the California Coastal Commission to act in the best interest of the citizens and give us an opportunity to display our displeasures in an open forum.

I believe that an issue of this importance should be presented to the members of our community. By moving the hearing to Newport Beach (or a nearby area) local residents will be able to attend and voice their opinions. I know that I speak for the whole community when I state that this relocation is not in the best interest of Newport Beach.

Your help is greatly appreciated and you can reach me at (714) 722-9465 if you have any questions or comments.

Sincerely,

Dean Haidl Jr.

CC: Pete Wilson

Exhibit F<sub>4</sub>

CAPITOL OFFICE  
State Capitol  
P.O. Box 942849  
Sacramento, CA 94249-0001

DISTRICT OFFICE  
18952 MacArthur Blvd., Suite 220  
Irvine, CA 92715  
(714) 863-7070

# California Legislature

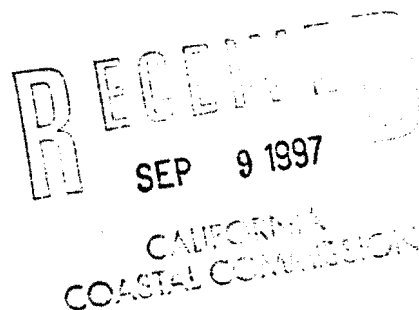


**MARILYN C. BREWER**  
ASSEMBLYWOMAN, SEVENTIETH DISTRICT

COMMITTEES  
RULES  
APPROPRIATIONS  
INSURANCE  
LOCAL GOVERNMENT  
TRANSPORTATION

September 4, 1997

Ms. Meg Vaughn  
Coastal Program Analyst  
California Coastal Commission  
South Coast Area  
200 Oceangate, 10th Floor  
Long Beach, CA 90802-4302



Dear Ms. Vaughn:

It has recently come to my attention that the California Coastal Commission will hold a hearing in Eureka at the request of Hoag Memorial Hospital Presbyterian on September 9, 1997, regarding the relocation of a methane gas processor. With regard to this request, I strongly urge the matter be taken off calendar and rescheduled in the Southern California area.

While the relocation of the methane gas processor on the Hoag Memorial Hospital grounds may be necessary to protect against dangers to the Hospital's child care center, the current proposal appears to present new health dangers for the number of families who live near the proposed relocation site. These potential dangers should be evaluated before a decision regarding the permit by the Commission is made.

Further, it is my understanding that the local residents, who would be most affected by the granting of this permit, had received only a two week notice regarding this hearing. Clearly, these individuals should have the opportunity for public input which cannot justly occur if the hearing is to be held in less than two weeks and across the state in Eureka.

For these reasons, I strongly urge the members of the California Coastal Commission to reconsider bringing this matter up on the September 9th hearing. Instead, I would respectfully request that the Commission members reschedule the hearing, preferably in Southern California, so as to provide adequate public input, and seriously evaluate the relocation of the methane gas processor to the proposed location.

Exhibit F<sub>5</sub>

September 4, 1997  
Page 2

Thank you for your consideration of this request. If you have any questions regarding this matter, please do not hesitate to contact me at (916) 445-7222.

Sincerely,

*Marilyn C. Brewer*

Marilyn C. Brewer  
Assemblywoman, 70th District

cc: Members, California Coastal Commission  
Mr. Bill Miller

Exhibit F<sub>5</sub>

## Newport Beach Townhouse Owners' Association

c/o Gill Management Company

2872 DeVoy

Anaheim, CA 92804

(714) 826-5549

September 4, 1997

Ms. Meg Vaughn

CALIFORNIA COASTAL COMMISSION

P.O. Box 1450

200 OceanGate, 10th Floor

Long Beach, CA 90802-4415

Re: PERMIT NUMBER: 5-92-368-A1

Dear Ms. Vaughn,

The owners of the Newport Beach Townhomes are strongly opposed to the above referenced project and hereby submit written testimony under the provisions of the California Health and Safety Code 42302.1. Relocation of the Methane Gas Elimination System from its current location near the junction of West Coast Highway (California route 1) and Newport Blvd (Route 55) to the proposed location will place this environmental hazard directly across West Coast Highway from our homes at 4401 through 4421 West Coast Highway, Newport Beach, CA. Our bedroom windows will be approximately 150 feet from a potential source of toxic fumes and an eyesore

We are concerned that this project will:

- Result in methane gas and hydrogen sulfide odors in and around our homes.
- Result in more overall traffic noise due to the necessity for trucks to service the chemicals in the Methane Gas Elimination System.
- Result in increased artificial lighting at night due to lighting around the Methane Gas Elimination System.
- Result in methane gas and hydrogen sulfide odors in both our community and neighboring Balboa Coves as a result of moving the Methane Gas Elimination System upwind against the prevailing Westerly winds.
- Result in threats to our, and our children's, health due to release of toxic fumes into the air.
- Result in an eyesore. The truck access the proposed System is not shielded by proposed plantings and faces our homes.
- Result in reduction of our property values due to the degraded environment.

Please note that the proposed ammended location is the same distance from our homes as the current collection and burn-off facility is from the Hoag Hospital day care center. In the STIPULATED ORDER FOR ABATEMENT AND FINDINGS AND DECISION OF THE HEARING BOARD, Case No. 4444-1 of the

Exhibit F<sub>6</sub>

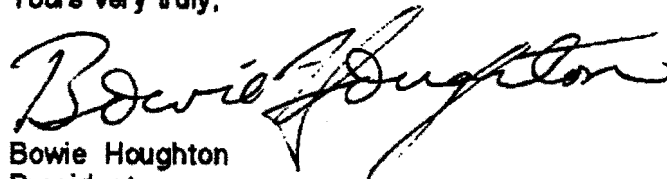
South Coast Air Quality Management District, 13 June 1997, CONCLUSIONS, paragraph 6, Hoag Hospital is required to install and maintain carbon dioxide, methane, and hydrogen sulfide 24 hour monitors and recorders at the Hoag Hospital day care center. The toxic gasses from the new facility will be more harmful to the 24 hour per day, 7 day per week residents of our community than they are to the part time users and employees of the day care center.

Our homes have been here over 20 years. The Hoag day care center is recently constructed.

We request that Hoag Hospital's request for relocation of the Methane Gas Elimination System, Permit No. 5-92-368-A1 be denied.

We request that the hearing on Permit No. 5-92-368-A1, scheduled for Tuesday, September 9, 1997, in Eureka, CA, be rescheduled for a future date and a location close to the subject project to allow attendance by affected local residents without undue financial hardship.

Yours very truly,



Bowie Houghton  
President  
Newport Beach Townhouse Owners' Association

cc: Board of Directors

Exhibit F<sub>6</sub>

Jill Lindsay  
Four Balboa Coves  
Newport Beach, California 92663

RECEIVED  
SEP 9 1997

5 September 1997

Re: Hoag Memorial Hospital Presbyterian  
Application Number: 5-92-368 AI

CALIFORNIA  
COASTAL COMMISSION

Dear Commissioners:

I am writing to you to protest the relocation of the methane gas elimination system to the far left hand corner of the Lower Campus development. My reasons are as follows:

1. After more than 20 years, the current system is finally operable.
2. Hoag's argument that they want to relocate the system away from the Child Care Facility is ludicrous. If it was so dangerous, why would they have built the child care facility next to the system in the first place?
3. The current system is closest to the largest underground pools of methane gas.

Finally, the reference in the report specifies that Balboa Coves is a source of naturally occurring methane gas. To my understanding there has never been any source documentation to substantiate that statement. However, as previously mentioned, large pools of gas have been documented at the entrance to Hoag's lower campus which is in close proximity to the existing system.

Please deny this request to relocate this system.

Thank you.

Sincerely,



California Coastal Commission  
Hold for Hearings Scheduled September 9, 1997  
Eureka Inn  
7th and F Street  
Eureka, California 95501

Commissioners ✓  
California Coastal Commission  
South Coast Office  
200 Oceangate, 10th Floor  
Long Beach, California  
90802-4302

Exhibit F<sub>7</sub>



COASTAL DEVELOPMENT PERMIT AMENDMENT  
5-92-368 A1  
LETTERS RECEIVED IN SUPPORT

EXHIBIT G

RECEIVED  
SEP 3 1997

CALIFORNIA  
270 Cagney Lane, COMMISSION  
Newport Beach, CA 92663-2696  
September 1, 1997

Attn. Meg Vaughn  
Coastal Program Analyst

California Coastal Commission  
South Coast Area  
P.O. Box 1450  
200 Oceangate, 10th Floor  
Long Beach, CA 90802-4416

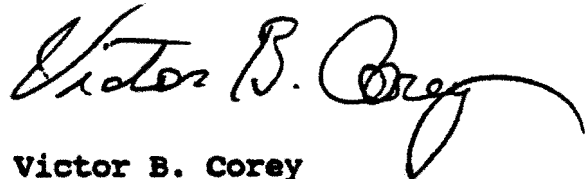
Subj. : Permit No. 5-92-368-A1

Gentlepersons:

I am strongly in favor of the relocation and upgrade of the existing methane gas elimination system, including the movement of the flame 1000 ft. to the west. I believe this action will result in significant reduction of exposure of residents of Villa Balboa to noxious gases, including hydrogen sulfide.

I commend Mr. Edwin Cowan of 270 Cagney Lane, Apt. No. 311, in Villa Balboa, for his many hours of work in initiating this action.

Respectfully yours,

  
Victor B. Corey

cc.: Mr. Edwin Cowan

Exhibit G,

coastl-1.doc

**Edwin J. Cowan**

270 Cagney Lane, #311, Newport Beach, CA 92663  
Telephone (714) 548-8054

RECEIVED  
SEP 9 1997

CALIFORNIA  
COASTAL COMMISSION

September 4, 1997

California Coastal Commission  
South Coast Area  
P.O. Box 1450  
200 Oceangate, 10th Floor  
Long Beach, Ca. 90802-4416

Attn: Meg Vaughn  
Coastal Program Analyst

I am in favor of the relocation of the gas flare located on the Hoag Hospital property in Newport Beach. I understand that gas scrubber equipment will be now installed to removed the sulfur from these combustible marsh gases that are dangerous to the health of local residents as well as the children in the nearby pre- school.

Recent tests by the SCAMQD of the marsh gases indicate an extremely high level of hydrogen sulfide. I hope the relocation of the gas flare will occur as soon as possible as ordered by the SCAQMD and not be delayed by the Coastal Commission.

Very truly yours,


  
Edwin J. Cowan

Exhibit G<sub>2</sub>

