STATE OF CALIFORNIA – THE RESOURCES AGENCY

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GRAY DAVIS, *Governor*

CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST AREA
SOUTH CALIFORNIA ST., SUITE 200
TURA, CA 93001
) 641 - 0142

March 25, 1999 RECORD PACKET COPY

TO: Commissioners and Interested Parties

FROM: Charles Damm, Senior Deputy Director
Gary Timm District Manager
BF Barbara Carey, Coastal Program Analyst

SUBJECT: **Notice of Impending Development 1-99, Pursuant to the Pepperdine University Certified Long Range Development Plan (LRDP)** for Public Hearing and Commission Action at the meeting of April 13-16, 1999 in Long Beach

SUMMARY AND STAFF RECOMMENDATION

The subject impending development is the relocation of an existing wastewater flow equalization station that will result in no increase to wastewater generation or treatment capacity. The development is described in detail in Section 3B below. The notice was received in the South Central Coast Office on March 11, 1999 and deemed filed on the same day. The University has indicated that notice of the impending development has been mailed, pursuant to California Code of Regulations §13549(b), on March 17, 1999 and that the impending development will begin no sooner than April 17, 1999. Staff is recommending that the Commission approve with Special Conditions Notice of Impending Development 1-99, finding it consistent with the certified Pepperdine University Long Range Development Plan (LRDP).

I. Procedure

§30606 of the Coastal Act and §13547 through §13550 of the California Code of Regulations govern the Coastal Commission's review of subsequent development where there is a certified LRDP. §30606 of the Coastal Act states that the University shall be responsible for notifying the Commission, other interested persons, organizations, and governmental agencies of the impending development and provide data showing the project s consistency with the certified LRDP. §13549(b) requires the Executive Director or his designee to review the notice of impending development (or development announcement) within ten days of receipt and determine whether it provides sufficient information to determine if the proposed development is consistent with the certified LRDP. The notice is deemed filed when all necessary supporting information has been received.

Within thirty days of filing the notice of impending development, the Executive Director shall report to the Commission the pendency of the development and make a

recommendation regarding the consistency of the proposed development with the certified LRDP. Subsequent development where there is a certified LRDP cannot be denied. It can only be conditioned when necessary to bring the development into conformity with the certified LRDP, pursuant to §13550 of the California Code of Regulations and §30605 and §30607 of the Coastal Act.

After public hearing, by a majority of its members present, the Commission shall determine whether the development is consistent with the certified LRDP and whether conditions are required to bring the development into conformance with the LRDP. No construction shall commence until after the Commission votes to render the proposed development consistent with the certified LRDP.

II. Staff Recommendation: Motion and Resolution.

Staff recommends that the Commission adopt the following motion and resolution. A **YES** vote by a majority of the Commissioners present is necessary to pass the motion.

Motion: I move that the Commission determine that the development described in Notice of Impending Development 1-99, as conditioned, is consistent with the Certified Pepperdine University LRDP.

Resolution: The Commission determines that the proposed Impending Development 1-99, as conditioned, is consistent with the Certified Pepperdine University LRDP, for the reasons discussed in the findings herein.

III. Special Conditions.

1. Plans Conforming to Geologic Recommendation

All recommendations contained in the Geotechnical Investigation, dated 2/99, prepared by Hushmand Associates and Wilson Geosciences, Inc.; and Site-Specific Probabilistic Earthquake-Induced Ground Motion Assessment, dated 2/99, prepared by Hushmand Associates shall be incorporated into all final design and construction including grading, foundations, and drainage. All plans must be reviewed and approved by a geologic/geotechnical engineer as conforming to said recommendations. Prior to the commencement of development, the University shall submit, for review and approval by the Executive Director, evidence of the consultant's review and approval of all project plans. The final plans approved by the consultants shall be in substantial conformance with the plans approved by the Commission relative to grading, foundations, and drainage.

2. Landscaping and Erosion Control.

A. Landscape Plan.

Prior to the commencement of development, the University shall submit a landscaping and erosion control plan prepared by a licensed landscape architect for review and approval by the Executive Director. The plan shall incorporate the following criteria:

(1) The existing wastewater flow equalization station shall be removed within sixty (60) days of the completion of the new station. All graded & disturbed areas on the subject site, including the slope area where the existing wastewater flow equalization station facilities are located, shall be planted and maintained for erosion control and visual enhancement purposes within sixty (60) days of the removal of the existing wastewater flow equalization station. To minimize the need for irrigation and to screen or soften the visual impact of development all landscaping shall consist primarily of native/drought resistant plants as listed by the California Native Plant Society, Santa Monica Mountains Chapter, in their document entitled Recommended List of Plants for Landscaping in the Santa Monica Mountains, dated October 4, 1994. Invasive, non-indigenous plant species which tend to supplant native species shall not be used.

(2) All graded and disturbed slopes, shall be stabilized with planting at the completion of final grading. Planting should be primarily of native plant species indigenous to the Santa Monica Mountains using accepted planting procedures, consistent with fire safety requirements. Such planting shall be adequate to provide 90 percent coverage within two (2) years, and this requirement shall apply to all disturbed soils;

(3) Plantings shall be maintained in good growing condition throughout the life of the project and, whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements;

(4) Should grading take place during the rainy season (November 1-March 31), sediment basins (including debris basins, desilting basins, or silt traps) shall be placed on the project site prior to or concurrent with the initial grading operations and maintained through the development process to minimize sediment form runoff waters during construction.

The permittee shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission – approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is necessary.

B. Monitoring Plan

(1) Five years from the date of the completion of landscape installation, the University shall submit, for the review and approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

(2) If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or a qualified 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.

IV. Findings and Declarations.

The Commission finds and declares as follows:

A. Background.

On September 12, 1989, the Commission denied the Pepperdine University LRDP as submitted and approved it with suggested modifications necessary to bring the LRDP into conformance with the Coastal Act. On February 7, 1990, the Board of Regents of the University acknowledged the receipt of the Commission's certification and agreed to the terms of the modifications to the LRDP. On April 12, 1990, the Commission concurred with the Executive Director's determination that the Board's action accepting the certification was legally adequate and sent such determination to the Secretary of Resources, thereby effectively certifying the LRDP. Since that time, the LRDP has been amended eight times and the University has processed ten notices of impending development.

As certified in the LRDP, Pepperdine University's ultimate buildout will accommodate 5,000 Full Time Equivalent Students (FTE), 500 faculty, 777 staff members, and 17 administrators. The latest (1997-1998, up to and including Summer 1998) figures show an enrollment of 2,433 FTE students, and employment of 238 faculty members and 677 staff members. The impending development would not result in any additional students, faculty or staff.

The University has prepared a development announcement for construction of the wastewater flow equalization station discussed herein which is signed by the Executive Vice President of the University for the proposed development. Staff would note that on May 4, 1994, the Board of Regents of the University adopted a resolution which authorized the Executive Vice President of the University to have the legal authority to initiate impending development and to bind the University to any special conditions imposed by the Commission associated with such a notice.

Staff would note that the relocation of the wastewater flow equalization station proposed herein was previously proposed as part of NOID 1-98. Prior to the hearing, the University withdrew the flow station from consideration (another element relating to improvements to Alumni Park was also withdrawn). The University indicated that this item would be re-submitted at a later date.

B. Description of the Impending Development.

The impending development consists of the relocation of the existing wastewater flow equalization station from its present location on a slope above and to the east of an existing parking lot (Parking Facility J) south of the Firestone Fieldhouse, to an underground site beneath the same parking lot. This development includes 3,050 cu. yds. of grading (2,625 cu. yds. excavation and 425 cu. yds. fill). The excess cut material would be placed at the approved University stockpile site. The existing flow station, which includes six tanks, is located above-ground. The proposed replacement flow station, shown on Exhibit 2 would consist of four tanks.

Parking Facility J is located upgrade of Banowsky Boulevard in the central, developed portion of the existing campus. There is a landscaped slope descending from the edge of the parking lot south to the street below. The University proposes to grade a cut into this slope (2,625 cu. yds. excavation and 425 cu. yds. fill) and construct wing walls in order to create a 15 foot wide access for personnel and equipment to install and maintain the flow station. As shown on Exhibit 2, the four proposed tanks will be located beneath the parking area. The mechanical room will be located beneath what is currently landscaped slope. Exhibit 3 is a photo rendering showing the appearance of the only visible portion of the project.

The proposed wastewater flow equalization station is part of the University's sewage disposal system. Wastewater generated throughout the campus flows to the flow station where it is stored in the tanks until it is directed either to the Malibu Mesa Treatment Plant or to the Las Virgenes Water District's Tapia Plant. The use of the flow equalization station allows for wastewater to be pumped to the treatment plant in a more steady flow, avoiding overloading the plant in peak usage periods. The new wastewater flow equalization station will not result in any increase in wastewater flow, nor will it have any effect on the treatment capacity of the subject plants.

The University has indicated that the existing flow station will be maintained on site for a short period after the new station is completed. During this period the University will be testing the new system to ensure it operates properly. After the testing period, the existing flow station facilities (tanks, plumbing, fencing) will be removed and the area landscaped.

C. New Development.

§30250(a) of the Coastal Act states that new development shall not overburden the public infrastructure and shall be located where it will not have significant individual or cumulative effects on coastal resources. §30253 of the Coastal Act requires that new development minimizes risks to life and property, assures stability and structural integrity, and to not contribute to destruction of the site or surrounding area. The LRDP contains policies relating to public works and hazards which require new development to minimize individual and cumulative impacts on coastal resources.

Sewage Disposal.

Section VIII., Utilities and Public Works contains a policy which states that:

> *All new development shall have a permanent method of sewage disposal to the level of tertiary treatment. . .subject to the review and approval of the County of Los Angeles. . .*

Pursuant to this policy, the Commission has consistently required the University to provide evidence of wastewater treatment capacity adequate to serve new development. Based on Los Angeles County's method of calculating sewage generation estimates for land uses, the cumulative sewage generation for the campus, including existing and previously approved development is estimated at 275,928 gallons per day (gpd). The LRDP states that the total sewage capacity for the campus at buildout is limited to 300,000 gpd. 200,000 gpd may be treated at the Malibu Mesa Treatment Plant and, pursuant to the University's agreement with the Las Virgenes Water District, 100,000 gpd may be treated at the Tapia Plant. Notwithstanding the County's estimates for sewage generation, actual flow records maintained for the existing campus show that the current usage is 155,913 gpd average based on the nine month school year. Based on the actual flow records, the University's engineer has projected the cumulative total wastewater flows for all existing and impending development to be 170,648 gpd, well within the buildout capacity.

The impending flow equalization station is a part of the wastewater disposal system for the campus. This development will not result in any additional students, faculty or staff at the University. The new station will replace an aging facility and allow for more efficient delivery of wastewater to the two treatment plants. It will not result in any increase in generation of wastewater or any increase in treatment capacity at either

Malibu Mesa or Tapia Treatment Plant. Therefore, the proposed development is consistent with the LRDP policies regarding wastewater disposal.

Hazards.

Section XI, Hazards and Safety contains the following two policies:

> *All available safety standards, regulations and related research information will be incorporated into the planning and design of all new developments.*
>
> *All structures will be constructed in accordance with Los Angeles County Codes.*
>
> *All structures shall be setback fifty (50) feet from the Malibu Coast Fault or any active splays of the fault. On potentially active splays the setback requirement may be lessened as determined by a detailed geotechnical investigation.*

The new wastewater flow equalization station will be located beneath an existing parking lot in the developed area of campus. The project is underlain by approximately 60 to 80 feet of engineered fill material placed in the original campus grading. The University has supplied evidence of the review and approval of the new flow station by the County of Los Angeles. Additionally, the University has submitted the following reports addressing the geologic stability and faulting with regard to the project site: Geotechnical Investigation, dated 2/99, prepared by Hushmand Associates and Wilson Geosciences, Inc.; and Site-Specific Probabilistic Earthquake-Induced Ground Motion Assessment, dated 2/99, prepared by Hushmand Associates.

The geology report identifies the closet active splay of the Malibu Coast Fault as located 1,500 feet to the south of the site, at Winter Mesa. Two potentially active splays of the fault were determined to pass 50 to 250 feet to the south of the site of the flow station. Based on this information, the impending development will be consistent with the fault setback policy of the LRDP.

The consultants' reports identify the site as part of the campus mass graded in the past The site of the impending development is underlain with 60 to 85 feet of compacted, engineered fill. The consultants found that the existing compacted fill slopes show no overt signs of failure such as creeping or slumping. No unusual cracking was observed in the parking lot or roadways immediately adjacent to the site. The consultants make recommendations about site preparation and grading, slopes, foundations, and structure design. The report concludes that: "Based on geotechnical considerations, and provided the following site grading and foundation recommendations are implemented, the site is considered suitable for the proposed development".

Based on the recommendations of the consulting geologists and geotechnical engineers, the Commission finds that the impending development is consistent with the policies of the LRDP so long as the consultants' recommendations are incorporated into

the project plans. Therefore, the Commission finds it necessary to require the applicant to submit project plans that have been certified in writing by the consulting geologists and geotechnical engineers as conforming to their recommendations. This is included as Condition No. 1.

In response to public comments about the risk of upset to the surrounding area from a build-up of methane gas in the flow station facility, the University has provided an analysis, dated 8/98, prepared by Civiltec Engineering, Inc. This analysis states that:

> Methane gas is a by-product of some organic decomposition in an anaerobic condition (an environment with very little oxygen). This condition also causes sewage to go septic, which can be recognized by its pronounced unpleasant odor.

The analysis describes that the wastewater in the University's system will move rapidly through the pipes and be fully aerated. Further, the analysis concludes that:

> The new wastewater flow equalization station will definitely be designed with the capability of maintaining the volume of wastewater in an aerobic, aerated condition. The wastewater flow equalization station is a pump station, which is necessary to distribute the peak wastewater flows to the two treatment plants to meet availability. The wastewater will be constantly moving through the flow equalization station and only remain there for a few hours at the most, following peak inflow periods.

Therefore, staff concludes that there should be no risk of upset from the presence of methane gas in the flow station because the wastewater will be continually aerated.

Odor and Noise.

Although the certified LRDP contains no policies relating to the minimization of odor or noise, the University has provided information relating to these issues in response to public comments. These comments (Exhibit 4) are primarily concerned with the location of the new, underground flow station being in closer proximity to existing residences in Malibu Country Estates and any potential increase in odors or noise from its operation.

Odor emission from the new station will be minimized, as discussed above, by the aeration of the system, which will reduce the potential for the wastewater to go septic. The wastewater tanks will be vented through a pipe to a power ventilator and released through an outlet in the area where the existing flow station is currently located. As such, any potential odors released would be no closer to the residences than the current situation. The pumps would produce no exhaust fumes, as they are electric motor driven. Two small vents will be located adjacent to the parking lot, which will only provide ventilation to the mechanical room below when operation personnel are working there.

Noise from the new flow station will likewise be minimized. The pumps, which will be electric motor driven, will be maintained within the subterranean concrete enclosure. The pumps will generate no noise outside the enclosure. The portable generator will be muffled, will generate less noise than the existing generator, and will be located adjacent to the slope near the location of the existing station. Furthermore, the generator will only be rarely operated, either when tested by the operators or as an auxiliary power source when the electrical service is out.

Visual Resources

The certified LRDP contains the following policy:

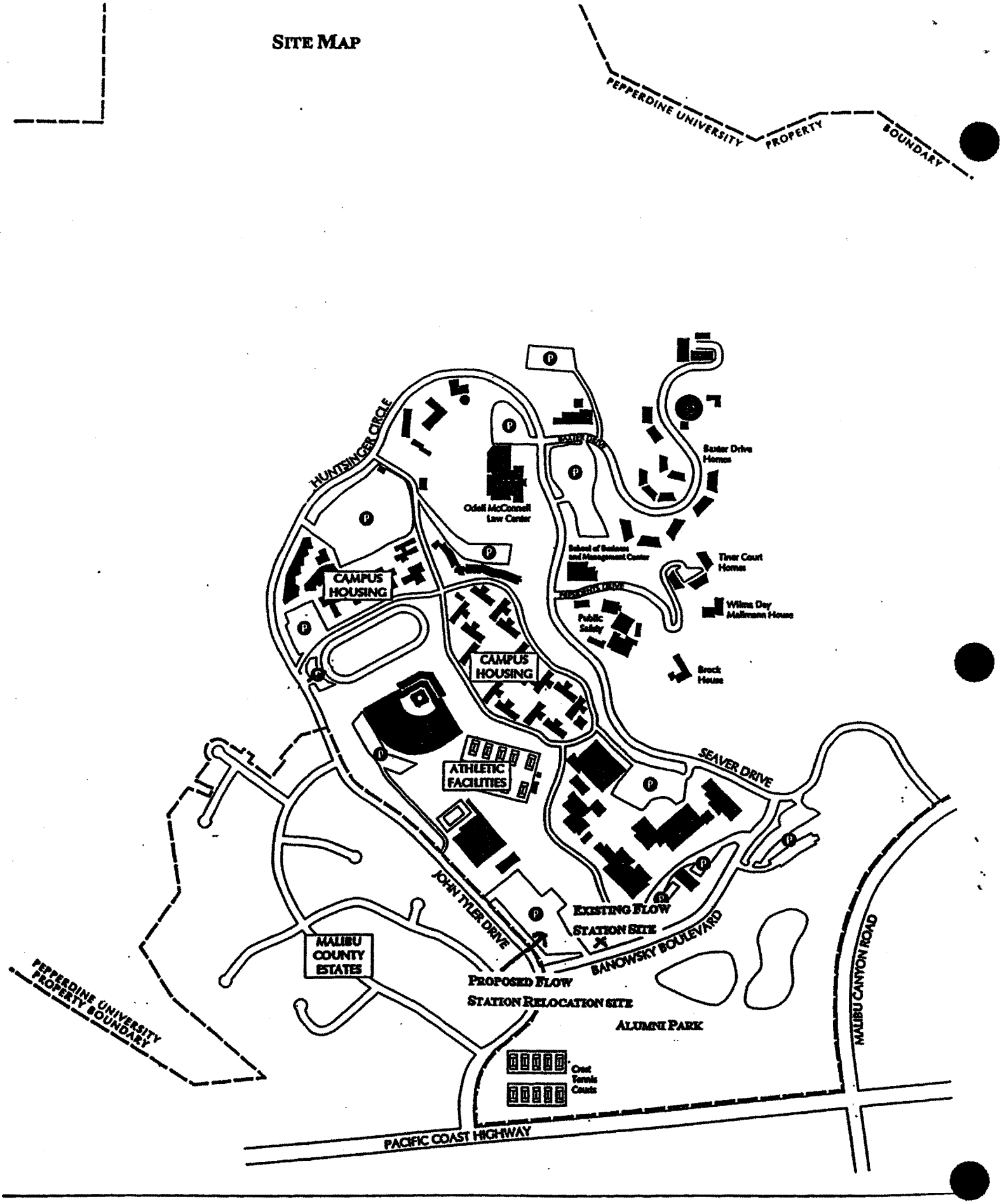
> *Visual resources will be preserved to the maximum degree possible during the planning and design phases of any new development.*

The impending development would be located in the existing, developed area of the campus. The proposed location of the flow station would be underground and the existing above ground tanks would be removed, resulting in an improvement to visual quality. However, the proposed grading for the new flow station and the bare slopes created by the removal of the existing station could cause adverse visual impacts if these areas are not revegetated after completion of the project. In order to ensure that the impending development is consistent with the visual resource policies of the LRDP, the Commission finds it necessary to require the University to submit a landscaping plan for these two areas, which will ensure that all graded or disturbed slopes are fully revegetated. This is included as Condition No. 2. As conditioned, the impending development will be consistent with the visual resource policies.

Conclusion.

In conclusion, the Commission finds that the proposed development will have no adverse impacts, individually or cumulatively, on coastal resources and, as conditioned, is consistent with the applicable policies of the LRDP. As discussed above, the impending development will not result in any increase in generation of wastewater or any increase in treatment capacity at either Malibu Mesa or Tapia Treatment Plant. As conditioned to require review of the final plans by the geotechnical consultants, the impending development will minimize risks from geologic hazards. There should be no risk of upset from the presence of methane gas in the flow station because the wastewater will be continually aerated. Odors and noise will be minimized by the project design. As conditioned to prepare and implement a landscaping plan for all disturbed areas, the impending development will minimize impacts to visual resources. Therefore, the impending development, as conditioned, is fully consistent with the applicable policies of the certified LRDP.

SITE MAP



PEPPERDINE UNIVERSITY MALIBU CAMPUS

ENVICOM CORPORATION

EXHIBIT 1
Pepperdine NOID 1-99
Site Map

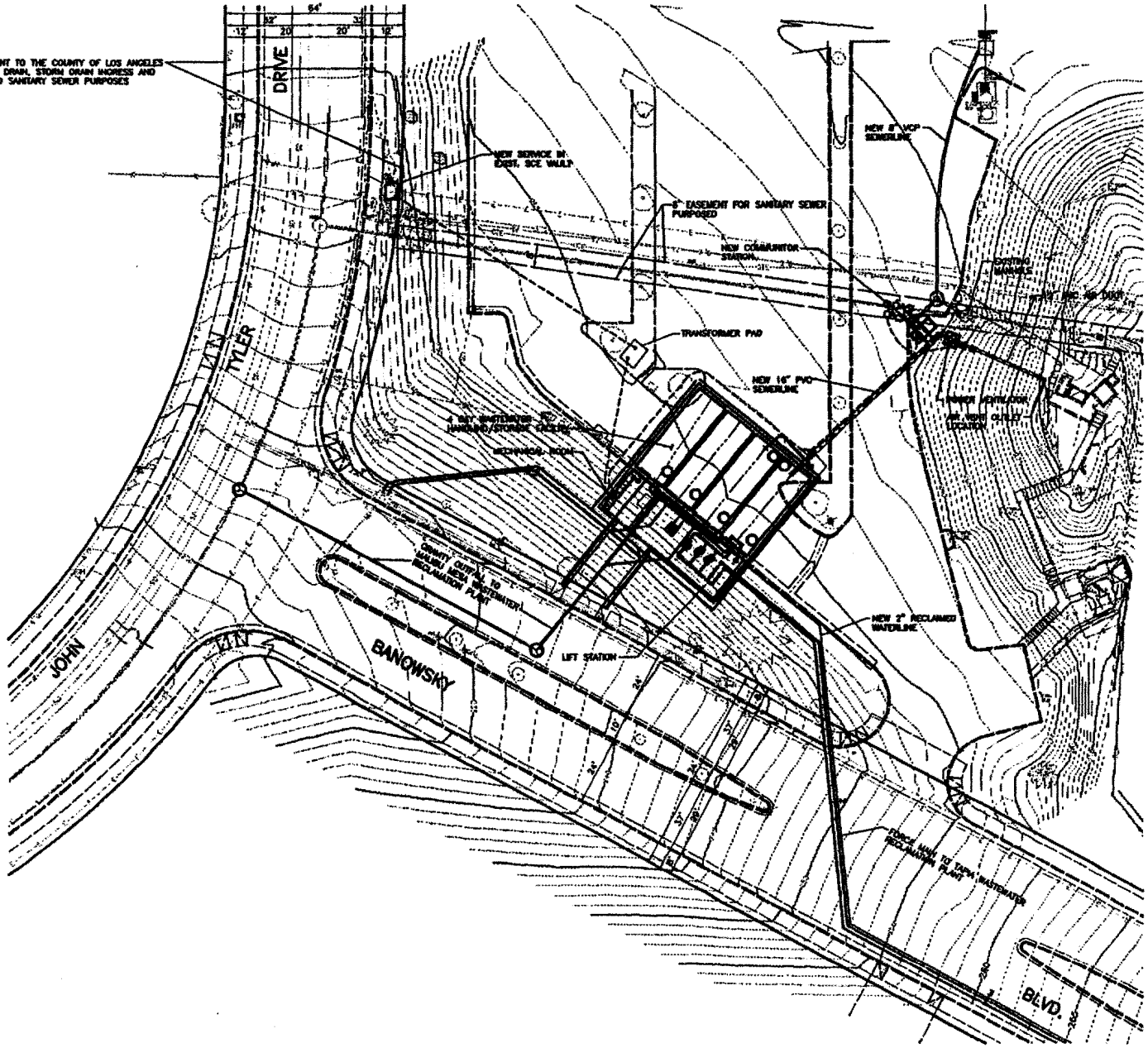


EXHIBIT 2

Pepperdine NOID 1-99

Site Plan

REVISIONS			
NO.	DESCRIPTION	APP.	DATE

APPROVED BY:

CIVILTEC ENGINEERING, INC. — DATE

APPROVED BY:

CIVILTEC engineering inc.

PEPPERDINE UNIVERSITY

WASTEWATER FLOW EQUALIZATION STATION

SITE PLAN

DESIGN: RJ/ISC | CHECKED: WDB | SCALE: NONE

EXHIBIT 3
Pepperdine NOID 1-99
Photo Rendering

Robert A. Briskin
24531 Vantage Point Terrace
Malibu, California 90265

July 29, 1998

BY FEDERAL EXPRESS

California Coastal Commission
South Central Coast Area
89 S. California Street
Suite 200
Ventura, California 93001

Re: Proposed Relocation of Waste Water Flow Station for Pepperdine University

Gentlemen:

Our property directly adjoins Pepperdine University's property and the area where the University is proposing to relocate a sewage waste water flow station ("Sewage Station"). We have been informed that the Sewage Station will include pumps and underground storage tanks.

We understand that the California Coastal Commission will be addressing this project pursuant to Pepperdine University's long-range development plan at the Commission hearing scheduled for August 11-14 in Huntington Beach, California. Our comments to this Sewage Station are outlined below.

We would request that your Commission in its review of the relocation of the Sewage Station considering the following factors:

1. First, we are perplexed at the notice that we received regarding this hearing. We received this notice on July 24, 1998 for a hearing scheduled for August 11, and construction indicated in the LRDP Project Evaluation as commencing on August 24. Is this adequate notice to ourselves and other neighboring land owners?

2. (a) Entirely Below Ground? Currently, the waste water flow station is located on an upper hill behind a fence designed to block its view. It is away from our view of the ocean. Pepperdine University is proposing to move the Sewage Station immediately behind our homes in the line of sight for our ocean view (although stated to be below ground). Please verify that this entire project is to be entirely below ground so as not to affect any party's ocean view.

(b) Noise. Currently, the Sewage Station at its present site contains pumps which are extremely noisy when you are within 25 yards of same. The pumps are to be located at the new proposed site much closer to the homes immediately adjacent to the

EXHIBIT 4
Pepperdine NOID 1-99
Public Comments (Submitted in response to NOID 1-98)

University. Although the initial description presented to us by Pepperdine University states that the facility is to be below ground, we understand the pump's capacity will be increasing. Additionally, at the new site there will be openings for air circulation and access doors. Will noise permeate from these pumps which will disturb the immediately adjacent homes? In the past these pumps have operated both during the day and at night. Have any noise studies been done by Pepperdine University regarding these pumps and whether the pumps can be heard by the adjacent homes? Will the pumps be operating at night and during the day time? The topography of the new site where the potential openings and vents will be located should be designed so that the land does not act as a "speaker" from the Sewage Station's ventilation openings causing noise to the adjacent homes.

(c) Potential Emissions of Noxious Fumes. The Sewage Station at the current upper hill location has in the past emitted noxious sewage fumes, although the problem was mitigated upon complaints of the neighbors. However, the new location of the Sewage Station is to be closer to the homes. What is the risk that fumes will be emitted from the Sewage Station to these immediately adjacent homes?

Thank you for investigating the above items. I have discussed these concerns with Robert Thompson of Pepperdine University by telephone this past week. I would appreciate being furnished with further information addressing these concerns.

Very truly yours,

Robert A. Briskin

cc: Phil Phillips, Pepperdine University (by fax - 310/456-6956)
Marilyn Santman (by fax - 310/456-5574)

Robert A. Briskin
24531 Vantage Point Terrace
Malibu, California 90265
Telephone: 310/201-0507
Facsimile: 310/201-0588

August 4, 1998

BY FEDERAL EXPRESS

California Coastal Commission
South Central Coast Area
89 S. California Street
Suite 200
Ventura, California 93001

Re: Response to Notice of Impending Development 1-98 Pursuant to Pepperdine University Certified Long Range Development Plan for Public Hearing on August 11, 1998

Gentlemen:

This letter is to respond to the Summary and Staff Recommendation dated July 23, 1998 for the above-referenced development.

1. Pepperdine University Should Be Required to Prepare Studies of Noise Effects, Release of Noxious Odors, Etc. As stated in my letter of July 29 to you (a copy of which is attached), there is no evidence that the University has made any effort to study the potential effects of noise to the immediately adjacent homeowners or the potential release of noxious sewage fumes from Pepperdine's proposed sewage storage and pumping facility. The Coastal Commission staff recommendations do not even address these issues.

The proposed new sewage facility is to be located immediately adjacent to neighboring homes. Please see the enclosed photographs showing the immediately adjacent homes taken from the location of the new proposed site.

Has the Coastal Commission staff considered the noise effects of the pumps for this new sewage facility? The pumps themselves are currently very noisy when you are close to them. Has the Coastal Commission staff considered the release of odors from this new location? The current sewage storage and pumping facility has had in the past odor problems which were eventually mitigated. Since the new proposed sewage facility is to be located much closer to the neighboring homes, we believe it is important that noise studies be prepared (since there will be openings from the facility from which noise could disturb the neighboring

houses). There should also be studies of potential odors being released either in normal operations or by accidental means and what measures are being taken to mitigate these items.

Will the entire facility be below ground? Is any part of the sewage facility to be above the current grade level? The Coastal Commission staff report is not clear on this issue. If any item is to be above grade level, then this could potentially block the ocean views of the adjacent homes, and we would object to such above-ground construction.

The immediately adjacent homeowners should be assured that no noise will be emitted from the loud motors from this pumping station and that no sewage fumes will be emitted.

2. Obstruction of Ocean Views to Homeowners from Alumni Park. One of the proposed items in the development plan is to reconfigure Alumni Park. The immediately adjacent homes (including our own) look over Alumni Park for their ocean views. In the past, Pepperdine University has planted coral trees which over the years have grown and have blocked our ocean views. Please see the enclosed photograph showing this blocked view. We have repeatedly requested that Pepperdine University cut down these trees or trim these trees. The University, although acknowledging our repeated requests, has failed cut down these trees or trim these trees in the past.

The planting of trees to obstruct neighboring property owners' views directly affects the coastal resources and the abilities of these adjacent property owners to enjoy the ocean views. We would strongly urge the Coastal Commission to require Pepperdine University to cut down these trees (which there are approximately four trees) in the course of their grading and doing the reconfiguration of Alumni Park.

3. Lack of Proper Notice. We received notice of this development and hearing from Pepperdine University on July 24, 1998 (after the Coastal Commission staff prepared their recommendation). The hearing is scheduled for August 11, and construction stated to immediately commence on August 23. We immediately sent in our response under my letter of July 29. How can the Coastal Commission staff make a recommendation without even seeing the responses of those landowners directly affected? On the face, this would appear to be a total lack of proper notice and consideration of the issues. It is impossible for us to attend the meeting since we will be out of town on the date the meeting is scheduled. Accordingly, we are forwarding our comments in this letter.

We would request that the hearing be continued and that the Coastal Commission not approve this plan.

Summary

We are enclosing the photocopies and sending a copy of my prior letter to each of the Coastal Commissioners in order that they are informed of these issues. We request that the Coastal Commission require noise and odor studies.

We urge Pepperdine University to consider the neighboring homeowners and their rights to enjoy the ocean views and the other coastal resources.

If you have any questions, please contact me at the above telephone number.

Very truly yours,

Robert A. Briskin

cc: Coastal Commissioners