

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



W23c

A-5-PPL-17-0015 (LADWAP)

JUNE 7, 2017

EXHIBITS

Table of Contents

Exhibit 1: Location and Vicinity Map

Exhibit 2: Photo of Subject Site, 10/7/2016

Exhibit 3: Local CDP No. 16-14 and Bureau of the Engineering Staff Report

Exhibit 4: Appeal

Location Map: Sunset Blvd. Public Right-of-Way



Photo credit: Bing Maps

Vicinity Map: Sunset Blvd. Public Right-of-Way



Photo credit: Bing Maps

Exhibit 1

Page 2 of 2



California Coastal
Commission

Photo of PTDS at Sunset Blvd. Public Right-of-Way, 10-7-16



Photo by Commission Staff

Exhibit 2

Page 1 of 2



California Coastal
Commission

Photo of PTDS at Sunset Blvd. Public Right-of-Way, 10-7-16 Looking Seaward from Sunset Blvd.



Photo by Commission Staff

**BOARD OF PUBLIC WORKS
MEMBERS**

KEVIN JAMES
PRESIDENT

HEATHER MARIE REPENNING
VICE PRESIDENT

MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

LUZ M. RIVAS
COMMISSIONER

FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

COASTAL DEVELOPMENT PERMIT

(Under authority of Sec. 30600(b) of the California Coastal Act of 1976)

PROJECT TYPE: (X) Public () Private

APPLICATION NUMBER: 16-14

NAME OF APPLICANT: Los Angeles Department of Water and Power (LADWP)
111 North Hope Street, Room #856
Los Angeles, CA 90012

PROJECT LOCATION: The project is located in the public right-of-way parallel with Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place, within the Brentwood-Pacific Palisades Community Plan

DEVELOPMENT DESCRIPTION: The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26 feet x 7 feet 5 inches, three 833-KVA transformers measuring 6 feet 9 inches tall x 4 feet 7 inches wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The underground substructure will be connected to the PTDS via underground cable terminations. The underground substructure work consists of approximately 1,000 feet of trench for conduit installation with a 9 feet 4 inches x 17 feet 4 inches substructure near the PTDS. The trench will be from two existing substructures on Marquez and Sunset to the new substructure and the PTDS. The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational.

All applicable regulations will be incorporated into and adhered to per standard procedures.

- I. The proposed development is subject to the following conditions imposed pursuant to the California Coastal Act of 1976:
 - (a) 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 City Engineer's office.

- (b) Interpretation: Any questions of intent or interpretation of any condition will be resolved by the City Engineer.
- (c) Assignment: The permit may be assigned to any qualified person, provided assignee files with the City Engineer an affidavit accepting all terms and conditions of the permit.
- (d) Terms and Conditions Run with the Land: These terms and conditions shall be perpetual, and it is the intention of the City Engineer and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.
- (e) Other approvals: Obtain permit from the State Coastal Commission if project is determined to be a Major Public Works per §13012 of the California Code of Regulations.

II. The following are conditions of approval for the LADWP Temp Pole Top Distribution Station – Sunset Blvd. @ Marquez Ave. (W.O. UR400725):

(a) Special Conditions of Approval

1. **Monitor.** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards shall be present to monitor all ground-disturbing activities.
2. **Awareness Training.** Prior to initiation of ground-disturbing activities for the underground portions of the project, the archaeological monitor will conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training would explain the importance of and legal basis for the protection of significant archaeological resources. Each worker would also learn the proper procedures to follow in the event that cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor and the archaeological monitor. It is recommended that this worker education session include visual images of artifacts that might be found in the project vicinity, and that the session take place on-site immediately prior to the start of ground-disturbing activities.
3. **Inadvertent Discovery.** In the event that archaeological resources are exposed during construction, work in the immediate vicinity of the find must stop until a qualified archaeologist can evaluate the significance of the find and make applicable recommendations to avoid significant impacts to archaeological resources. Construction activities may continue in other areas. If the discovery proves



significant under CEQA, additional work such as testing or data recovery may be warranted.

4. Procedure for Human Remains. In accordance with CEQA Guidelines section 15064.5(e), in the event of the accidental discovery or recognition of any human remains during construction, the following steps shall be taken:

(1) There shall be no further excavation or disturbance of the site of the human remains or any nearby area reasonably suspected to overlie adjacent human remains until:

A. The Los Angeles County Coroner must be contacted to determine that no investigation of the cause of death is required, and

B. If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.

2. The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.

3. The most likely descendent (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. The MLD shall complete its inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site, or

(2) Where the following conditions occur, LADWP or its authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity in a location not subject to further subsurface disturbance.

A. The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the NAHC.

B. The MLD identified fails to make a recommendation; or

C. LADWP or its authorized representative rejects the recommendations of the MLD, and the mediation by the NAHC fails to provide measures acceptable to LADWP.

5. Written Report. A written report detailing monitoring activities and recommendations



for further treatment of archaeological discoveries shall be provided to the City upon completion of the monitoring work. The report shall comply with the requirements and recommendations of the California Office of Historic Preservation. A draft copy shall be submitted to the City for review within 30 days of monitoring completion. A final report shall be submitted to the City in hard copy and electronic format (Adobe PDF acceptable) no later than one week after receipt of comments on the draft report from the City. A hard copy of the report shall also be submitted to the South Central Coastal Information Center within forty-five (45) days of final submittal to the City.

III. FINDINGS: In keeping with the findings and recommendations set forth in the adopted staff report incorporated herein by reference, the City of Los Angeles finds that:

- (a) The development is in conformity with Chapter 3 of the California Coastal Act of 1976, and will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program in conformity with said Chapter 3.
- (b) The Interpretative Guidelines established by the Coastal Commission dated August 14, 1978 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making this determination, and the decision of the permit granting authority has been guided by any applicable decision of the Coastal Commission.
- (c) If the development is located between the nearest public road and the sea of shoreline of any body of water located within the Coastal Zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the Coastal Act.
- (d) Pursuant to the California Environmental Quality Act (CEQA), the LADWP found the project to be exempt from CEQA review and filed a Notice of Exemption on May 26, 2016.

Staff reviewed and considered the Notice of Exemption and determined there are no additional evaluations required by the California Environmental Quality Act in connection with the approval of this permit.

- IV. Pursuant to a public hearing held on November 9, 2016, a Notice of Decision on December 5, 2016, and following the expiration of the mandatory ten calendar day appeal period with one appeal having been filed, and denial of the appeal by the Board of Public Works Commissioners on March 8, 2017.
- V. This permit may not be assigned to another person except as provided in Section 13170, Coastal Commission Rules and Regulations.



- VI. This permit shall not become effective until the expiration of 20 working days after a COPY of this permit has been received by the State Coastal Commission, upon which copy all permittees or agent(s) authorized in the permit application have acknowledged that they have received a copy of the permit and have accepted its contents, unless a valid appeal is filed within that time. The acknowledgement should be returned within ten (10) working days following issuance of the permit but in any case prior to commencement of construction. If the acknowledgement has not been returned within the time for commencement of construction under Section 13156(g), the executive director shall not accept any application for the extension of the permit.
- VII. Work authorized by this permit must commence within two years from the effective date of this permit. Any extension of time of said commencement date must be applied for prior to expiration of the permit.
- VIII. Issued: March 9, 2016 pursuant to local government authority as provided in Chapter 7 of the California Coastal Act of 1976.
- XIV. I, William K. Herriott, permittee/agent, hereby acknowledge receipt of permit number 16-13 and have accepted its content.

W.K. Herriott
Signature

March 10, 2017
Date



**BOARD OF PUBLIC WORKS
MEMBERS**

KEVIN JAMES
PRESIDENT

HEATHER MARIE REPENNING
VICE PRESIDENT

MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

LUZ M. RIVAS
COMMISSIONER

FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS**

**BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

**COASTAL DEVELOPMENT PERMIT APPLICATION NO. 16-14
FINAL STAFF REPORT**

(Under authority of the *California Coastal Act*, § 30600(b) of the *California Public Resources Code*,
and Chapter 1, Article 2, § 12.20.2 of the *Los Angeles City Municipal Code*)

I. PROJECT DESCRIPTION

Project Title: Inter. @ Sunset Blvd @ Marquez
Ave

Applicants: Department of Water and Power

Project Location:

Council District: 11

Community: Brentwood-Pacific Palisades

District: West Los Angeles

A. Project Description:

The project is located in the public right-of-way parallel with Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place, within the Brentwood-Pacific Palisades Community Plan (Figure 1. Project Vicinity Map and Figure 2. Aerial Overview).

The Los Angeles Department of Water and Power (LADWP) installed a temporary Pole-Top Distribution Station (PTDS) on Sunset Boulevard near Marquez Avenue in the Pacific Palisades community.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 4'7" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The underground substructure will be

connected to the PTDS via underground cable terminations. The underground substructure consists of approximately 1,000' of trench for conduit installation with a 9'4" X 17'4" substructure near the PTDS. The trench will be from two existing substructures on Marquez and Sunset to the new substructure and the PTDS. The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational. The PTDS is not a permanent solution for the need to provide adequate power service for the Palisades community.

All applicable regulations will be incorporated into and adhered to per standard procedures.

B. Project Background:

"Currently, the power load in Pacific Palisades is being distributed by a single distribution station, Distribution Station 29 (DS-29), constructed almost 80 years ago. The heaviest power load is also being distributed on circuits that are furthest away from DS-29, which negatively impacts reliability for the entire area. There is no space at DS-29 to build more capacity, and LADWP has not yet selected a site for a new D.S. As a temporary measure to relieve three overloaded 4,800 volts circuits that currently serve the Pacific Palisades community, Distribution Construction and Maintenance (DC&M) proposes to install two PTD Stations. To



Final Staff Report

Coastal Development Permit No. 16-14

prevent power outages, limit outage durations, and improve power quality for our Pacific Palisades customers. Without the PTD Stations, the next unscheduled outage that occurs due to natural causes or equipment failures, may last for several hours or days until permanent circuit repairs may be completed" (Ref. 9). Public services and facilities in the areas include the Pacific Palisades Medical Group, Pacific Palisades Veterinary Clinic, and fifteen (15) schools.

C. Project Cost:

The project cost is approximately \$930,000.00.

D. Previous Coastal Commission Actions:

None.

II. REGULATORY BASIS FOR REVIEW

A. Local Coastal Program

PRC § 3600(b) allows local governments to assume authority to issue coastal development permits within its jurisdiction before certification of its local coastal program and the Project is within the City Engineer's jurisdiction (LACMC § 12.20.2 et seq.). The application filed with the City Engineer was deemed adequate.

The Coastal Commission has the responsibility to review proposals for development in the Pacific Palisades coastal zone for compliance with the California Coastal Act of 1976.

The City of Los Angeles does not have a certified Local Coastal Program. However, after certification of the Local Coastal Program, permit processing procedures for coastal permits in the Pacific Palisades coastal zone are controlled by the Coastal Act and the California Code of Regulations. The City's permit issuing ordinances must be certified as part of the Local Implementation Plan. After certification of the Local Coastal Program by the Coastal Commission, the authority of the Coastal Commission is limited to development within the retained or original jurisdiction and to appeals of locally issued coastal development permits.

The Coastal Commission will also retain jurisdiction over amendments to coastal development permits that it approved before certification of the Local Coastal Program. Section 30519(a) of the Coastal Act provides that, except for appeals to the commission (as provided in Section 30603) after a Local Coastal Program, or any portion thereof, has been certified and all implementing actions have become effective, the development review authority provided for in Chapter 7 (commencing with Section 30600) of the Coastal Act shall no longer be exercised by the Coastal Commission and shall at that time be delegated to the local government that is implementing the Local Coastal Program.

Section 30519(b) states that 30519(a) does not apply to development proposed or undertaken on any tidelands, submerged lands, or on public trust lands. The Commission also retains jurisdiction over coastal development permits that were previously approved by the Commission as well as amendments to such permits.

The temporary Pole-Top Distribution Station project is located within the California Coastal Zone which is considered 'single coastal jurisdiction' (i.e., the Coastal Zone of the City of Los Angeles alone). This project must be authorized by a coastal development permit processed pursuant to the requirement of the Coastal Act. The PTDS is considered development, as defined in Section 30106 of the Coastal Act. Section 30106 of the Coastal Act states:

"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, alteration of the size of

Final Staff Report

Coastal Development Permit No. 16-14

any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provision of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).

B. Coastal Guidelines

In accordance with the provisions of Section 30620 of the Public Resources Code; and, in order to sustain the findings contained in Section 12.20.2-G(c) of the Municipal Code which requires a review and consideration of "...Interpretative Guidelines for Coastal Planning and Permits...", the State Coastal Commission has issued Interpretative Guidelines for the South Coast Region of Los Angeles including certain subareas of the City of Los Angeles. These subareas are defined as Pacific Palisades, Venice, Playa Del Rey, San Pedro and Wilmington. However, following prevailing case law (e.g., *Pacific Legal Foundation v. Coastal Commission* (1982) 33 Cal.3d 158), the City Engineer's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations.

C. Issues of Legal Adequacy of the Application

None.

III. STAFF FINDINGS

Six findings are required in order for a Coastal Development Permit to be issued. The six findings are:

(1) That the development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

(2) That the permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

(3) That the Interpretative Guidelines for Coastal Planning and Permits as established by the

California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making its determination.

(4) That the decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

(5) If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, that the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

(6) Any other finding or findings as may be required for the development by the California Environmental Quality Act.

Staff finds as follows:

1. The development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

In addition to the policies discussed above, Chapter 3 of the California Coastal Act of 1976 provides:

a) MARINE ENVIRONMENT (Article 4, of Chapter 3 of Public Resources Code, Sections 30230 through 30237)

Sections 30230 and 30231 state:

Section 30230. Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231. The biological productivity and the quality of coastal waters, streams, wetlands,

Final Staff Report
Coastal Development Permit No. 16-14

estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The project is not expected to impact any coastal waters, wetlands, estuaries or lakes. No marine resources exist within or adjacent to the project site.

The project consists of a temporary Pole-Top Distribution Station (PTDS) on Sunset Boulevard in the public right-of-way, in the Pacific Palisades community. The project also requires the installation of an underground vault, conduits, and cables.

Project construction will not involve transport of hazardous substances and, thus, there will be no spillage of crude oil, gas, petroleum products, or hazardous substances as prohibited by PRC Section 30232. The project will not involve the diking, filling, or dredging of open coastal waters (PRC Section 30233), commercial fishing and recreational boating facilities (PRC Sections 30234 and 30234.5), constructing revetments, breakwaters, or other construction altering the natural shoreline (PRC Section 30235). The project does not alter rivers or streams and, therefore, does not affect water supply and flood control (PRC Section 30236). PRC Section 30237 relates to Orange County wetlands and therefore does not apply.

b) LAND RESOURCES (Article 5 of Chapter 3 of Public Resources Code, Sections 30240 through 30244)

Sections 30240 and 30244 state:

Section 30240.

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those 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 those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30244. Where development would adversely impact archeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The project site contains no environmentally sensitive habitat areas and does not contain agricultural land or soils or timberland.

The California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB) indicates that ten(10) endangered or threatened species occur or have occurred historically within the Topanga Topographical Quadrangle of the 7.5-minute series map (See Attachment A). The project site does not provide suitable habitat for the species in question. Therefore, no impact to candidate, sensitive, or special status species would occur as a result of construction or operation of the project.

The project involved removal of four eucalyptus trees, of approximately 22-24 feet in height. LADWP will coordinate with the Urban Forestry Division of the Department of Public Works, Bureau of Street Services to ensure replacement of removed trees, and any other requirements as determined by the Bureau.

The project site is within an area of known archaeological resources. The project is in the public right of way, which has already been developed and disturbed.

However, to ensure cultural resources are protected, measures shall be implemented as outlined in the permit conditions in Section V of this report.

c) DEVELOPMENT (Article 6 of Chapter 3 of Public Resources Code, Sections 30250 through 30255)

Coastal Act Sections 30251, 30252, 30253 and 30254 state:

Section 30251. The scenic and visual qualities of coastal areas shall be considered and protected as

Final Staff Report
Coastal Development Permit No. 16-14

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.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 4'7" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The project is located in the public right-of-way parallel with Sunset Boulevard near the intersection with Marquez Avenue and Marquez Place.

Sunset Boulevard is a City designated scenic highway. Scenic features include views of mountains and estates. According to the Mobility Plan 2035, an element of the General Plan for the City of Los Angeles, "a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground. b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway".

According to the permit application, measures have been implemented to help screen the structures. Their placement is where other utility poles and lights are located. The poles were painted to blend in with the surroundings. There are no unobstructed views of the ocean from the project site.

No adverse impacts to scenic and visual qualities of the coastal area are expected (Figures 3 and 4).

Section 30252. The location and amount of new development should maintain and enhance public

access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project does not interfere with any existing coastal access roadways, bikeways, pedestrian paths or walkways.

Section 30253. 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 land forms along the 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.*
- (4) Minimize energy consumption and vehicle miles traveled.*
- (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

The project would not affect geologic, flood or fire risks (30253(1) (2)), would not conflict with any requirements of the State Air Resources Control Board or South Coast Air Quality District (30253(3)), would not affect energy consumption and vehicle miles traveled (30253(4)), and would not permanently affect the local community (30253(5)).

Final Staff Report
Coastal Development Permit No. 16-14

d) INDUSTRIAL DEVELOPMENT (Article 7 of Chapter 3 of Public Resources Code, Sections 30260 through 30265.5)

The project does not involve the development or expansion of industrial developments as addressed in Article 7, and as such, Section 30260 through 30265.5 are not applicable to the project.

2. The permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

The project conforms to relevant provisions and policies of the Coastal Act and the applicable Brentwood-Pacific Palisades Community Plan. The Community Plan recognizes the need for adequate sewers, drainage facilities, fire protection services and other public utilities to support development within hillside areas.

Thus the Project will not prejudice the ability of the City to prepare a Local Coastal Plan in conformity with the Coastal Act and amendments.

3. The Interpretative Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making the City Engineer's determination.

As noted in the preceding Sections, the California Coastal Commission's interpretive guidelines (State and Regional) for the Pacific Palisades area have been reviewed and considered in preparation of these findings and recommendations. However, following prevailing case law (e.g., Pacific Legal Foundation v. Coastal Commission (1982) 33 Cal.3d 158), the City Engineer's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations.

4. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

The decision of the permit granting authority, as evidenced in the staff report of this project, has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

5. If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

a) PUBLIC ACCESS (Article 2, of Chapter 3 of the Public Resources Code, Sections 30210 - 30214).

This project is not located between the nearest public road and the sea or shoreline of a body of water located within the coastal zone.

The project will not interfere with coastal access and will not impair any existing access to the coast.

The project is located within the public right-of-way on Sunset Boulevard near the intersection with Marquez Avenue and Marquez Place. There is no coastal access at the project site.

b) RECREATION (Article 3, of Chapter 3 of Public Resources Code, Sections 30220 through 30224)

Section 30220. Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

The project will not interfere with or impair any oceanfront or other land suitable for water-oriented recreational activities.

Section 30223. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

The project will not affect any currently undeveloped upland areas that might be approved for coastal recreation uses. There are no existing coastal-dependent recreational uses at the project site.

Final Staff Report
Coastal Development Permit No. 16-14

6. Any other finding or findings as may be required for the development by the California Environmental Quality Act.

Pursuant to the California Environmental Quality Act (CEQA), the LADWP found the project to be exempt from CEQA review and filed a Notice of Exemption on May 26, 2016.

Staff reviewed and considered the Notice of Exemption and determined there are no additional evaluations required by the California Environmental Quality Act in connection with the approval of this permit.

III. PUBLIC COMMENT

A public hearing was held on November 9, 2016 at 1:30 p.m. at the Palisades Branch Library located at 861 Alma Real Drive, Pacific Palisades, CA 90272.

In addition to staff members from the Bureau of Engineering, staff members from the L.A. Department of Water and Power, and a representative from Council District 11, twenty-six (26) members of the public were in attendance. Before the public hearing, twenty-one (21) written comments, including a petition with one hundred eleven (111) signatures, supporting the project were received; four written comments, including a petition with one hundred fifty one (151) signatures, opposing the project were received; two inquiries were received; and five people provided written comments at the hearing. Oral comments were also noted.

The following issues relevant to the California Coastal Act were raised:

1. "The PTDS is already in violation of the Act and must be removed."

Work on the project has stopped. The applicant submitted Application No. 16-14 for a local coastal development permit (CDP), which is evaluated in this staff report.

2. "The City has a conflict of interest and is highly motivated to approve the Application despite it violating the Act."

Section 12.20.2 of the Los Angeles Municipal Code (LAMC) establishes the City Engineer as the permit

granting authority for public projects and private projects where the approval for the underlying permit is within the jurisdiction of the City Engineer. Application No. 16-14 is being processed in accordance with the LAMC.

3. "The PTDS violates the Act due to visual blight and safety."

The project is located within the public right of way. As discussed in the foregoing staff report, measures have been implemented to help screen the structures. The PTDS was placed near other utility poles and lights. The poles were painted in an effort to blend in with the surroundings. There are no unobstructed ocean views from the project site.

The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations.

4. "Current violations of the Los Angeles General Plan and the Brentwood-Pacific Palisades Community Plan."

As discussed in the foregoing staff report, the Mobility Plan 2035, an element of the General Plan for the City of Los Angeles, states "a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground. b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway". The majority of the project is underground, as stated in the public hearing and will be screened to reduce visibility. The Brentwood-Pacific Palisades Community Plan states: "1. Install utilities underground through assessment districts or other funding, when feasible."

5. "The LADWP has not complied with CEQA and it is a requirement for the PTDS."

As discussed in the foregoing staff report, LADWP filed a Notice of Exemption on May 26, 2016. Class 3 Categorical Exemption consists of construction and location of limited numbers of new, small facilities or structures. The project is also exempt under Section 21080(b)(4), Specific actions

Final Staff Report
Coastal Development Permit No. 16-14

necessary to prevent or mitigate an emergency. The CEQA Notice of Exemption was properly posted by the County Clerk for the public notice and review.

6. "The LADWP has violated due process. ...failing to give sufficient notice and by failing to make materials and accurate information related to the Application available to the public in a timely manner and by holding the hearing on shortened notice after the LADWP had already constructed a significant portion of the PTDS without the proper permit."

Notice was provided in accordance with the LAMC, Section 12.20.2, F. Proceedings and Hearing, which states that "...the appropriate City agency shall notify by mail, at least (10) days prior to the hearing, the following: ..." The Notice of Public Hearing was mailed on October 25, 2016 and the hearing was held on November 9, 2016.

IV. STANDARD CONDITIONS OF APPROVAL

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 City Engineer's Office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the permit date as reported from the Coastal Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the City Engineer.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the City Engineer an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the City Engineer and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.
6. **Other approvals.** Obtain permit from the State Coastal Commission.

V. SPECIAL CONDITIONS OF APPROVAL

1. **Monitor.** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards shall be present to monitor all ground-disturbing activities.
2. **Awareness Training.** Prior to initiation of ground-disturbing activities for the underground portions of the project, the archaeological monitor will conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training would explain the importance of and legal basis for the protection of significant archaeological resources. Each worker would also learn the proper procedures to follow in the event that cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor and the archaeological monitor. It is recommended that this worker education session include visual images of artifacts that might be found in the project vicinity, and that the session take place on-site immediately prior to the start of ground-disturbing activities.
3. **Inadvertent Discovery.** In the event that archaeological resources are exposed during construction, work in the immediate vicinity of the find must stop until a qualified archaeologist can evaluate the significance of the find and make applicable recommendations to avoid significant impacts to

archaeological resources. Construction activities may continue in other areas. If the discovery proves significant under CEQA, additional work such as testing or data recovery may be warranted.

4. **Procedure for Human Remains.** In accordance with CEQA Guidelines section 15064.5(e), in the event of the accidental discovery or recognition of any human remains during construction, the following steps shall be taken:

- (1) There shall be no further excavation or disturbance of the site of the human remains or any nearby area reasonably suspected to overlie adjacent human remains until:

A. The Los Angeles County Coroner must be contacted to determine that no investigation of the cause of death is required, and

B. If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.

2. The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.

3. The most likely descendent (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. The MLD shall complete its inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site, or

- (2) Where the following conditions occur, LADWP or its authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity in a location not subject to further subsurface disturbance.

A. The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the NAHC.

B. The MLD identified fails to make a recommendation; or

C. LADWP or its authorized representative rejects the recommendations of the MLD, and the mediation by the NAHC fails to provide measures acceptable to LADWP.

5. **Written Report.** A written report detailing monitoring activities and recommendations for further treatment of archaeological discoveries shall be provided to the City upon completion of the monitoring work. The report shall comply with the requirements and recommendations of the California Office of Historic Preservation. A draft copy shall be submitted to the City for review within 30 days of monitoring completion. A final report shall be submitted to the City in hard copy and electronic format (Adobe PDF acceptable) no later than one week after receipt of comments on the draft report from the City. A hard copy of the report shall also be submitted to the South Central Coastal Information Center within forty-five (45) days of final submittal to the City.

VI. STAFF RECOMMENDATIONS

Based on the preceding analysis, we recommend that the City Engineer issue a Coastal Development Permit for this project.

M E Martin 12/2/16
Maria Martin Date
Manager
Environmental Management Group

DOCUMENT PREPARED BY:

Catalina Hernandez 12/5/16
Catalina Hernandez Date
Environmental Supervisor I

VII. REFERENCES

1. California Coastal Act -- Public Resources Code Division 20, Section 30000 *et seq.*
2. California Coastal Commission, October 14, 1980. *Regional Interpretive Guidelines. South Coast Region. Los Angeles County.*
3. California Coastal Commission, December 16, 1981. *Statewide Interpretive Guidelines.*
4. California Department of Fish and Wildlife Natural Diversity Database (CNDDB) Rare Find, Version 3.1.1, dated May 01, 2016, data will expire November 1, 2016.
5. City of Los Angeles. *Framework Element of the Los Angeles General Plan.*
<http://cityplanning.lacity.org/cwd/framwk/chapters/00/00.htm>
6. City of Los Angeles. *Municipal Code*, Chapter I, Article 2, Section 12.20.2, *et seq.*
7. City of Los Angeles. *Brentwood-Pacific Palisades Community Plan.*
8. Federal Emergency Management Agency, *Flood Insurance Rate Map*, Community Panel Number 0601370069D, February 4, 1987.
9. Pole-Top Distribution Station Installation, Pacific Palisades Community Background Information for California Environmental Quality Act Exemption, May 20, 2016

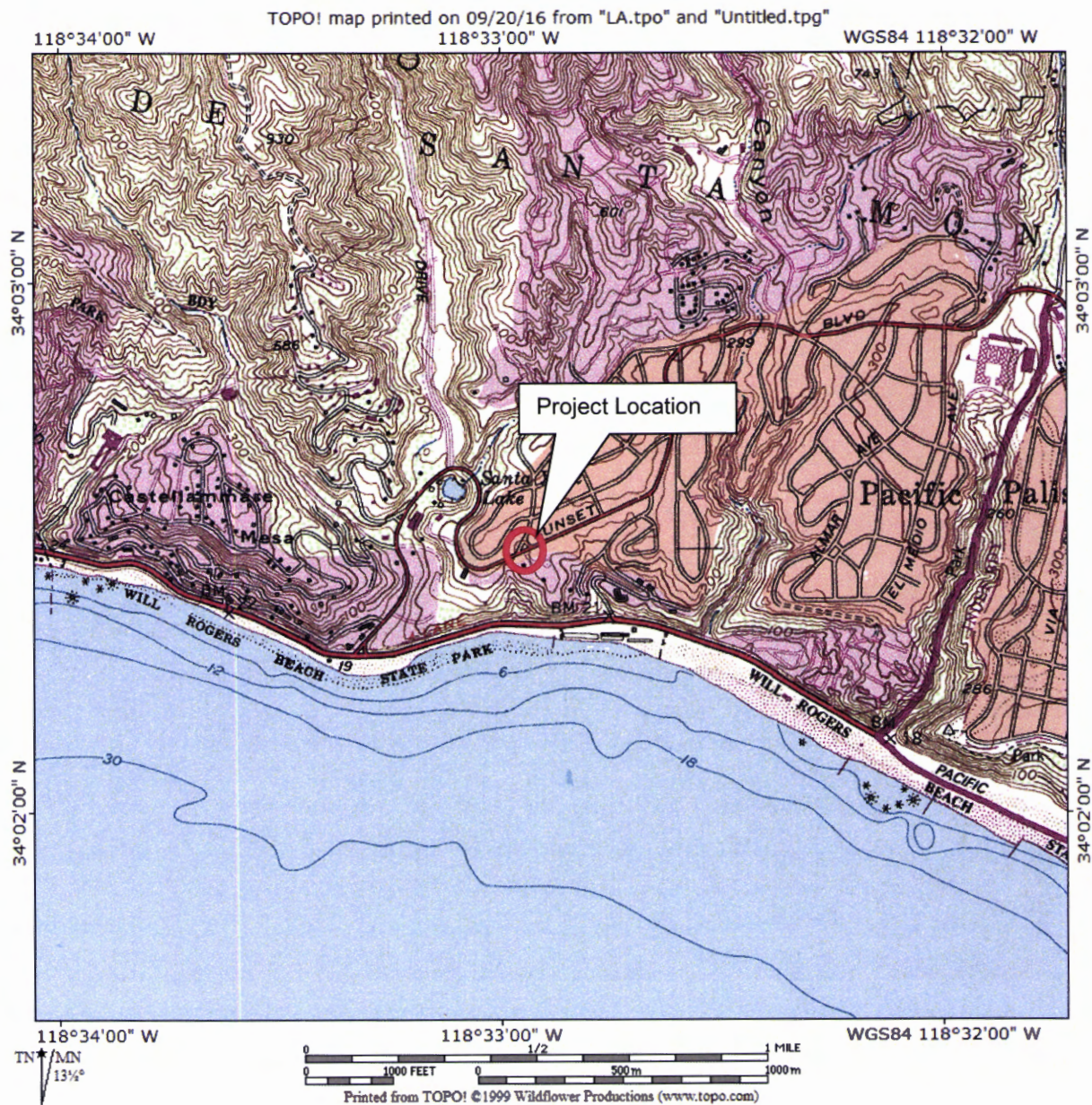


Figure 1. Vicinity map



Figure 2. Aerial overview (Google Earth)



Figure 3. Sunset Blvd. looking west



Figure 4. Sunset Blvd. looking south

CALIFORNIA COASTAL COMMISSION

SOUTH COAST DISTRICT OFFICE

200 OCEANGATE, 10TH FLOOR

LONG BEACH, CA 90802-4416

VOICE (562) 590-5071 FAX (562) 590-5084

APR 12 2017

CALIFORNIA
COASTAL COMMISSION**APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT****Please Review Attached Appeal Information Sheet Prior To Completing This Form.****SECTION I. Appellant(s)**

Name: 16974 Sunset Blvd, LLC

Mailing Address: 16974 West Sunset Boulevard

City: Pacific Palisades, CA

Zip Code: 90272

Phone: (310) 458-5959

SECTION II. Decision Being Appealed

1. Name of local/port government: City of LA – Pacific Palisades
2. Brief description of development being appealed: Installation of a “temporary” pole top power distribution station.
3. Development's location (street address, assessor's parcel no., cross street, etc.):
16970 W. Sunset Blvd., In The Prow Between Marquez Ave. And Marquez Pl., Pacific Palisades, City Of Los Angeles, Los Angeles County, CA 90272
4. Description of decision being appealed (check one.):
 - ☐ Approval; no special conditions
 - ☒ Approval with special conditions:
 - ☐ Denial

Note: For jurisdictions with a total LCP, denial decisions by a local government cannot be appealed unless the development is a major energy or public works project. Denial decisions by port governments are not appealable.

TO BE COMPLETED BY COMMISSION:

APPEAL NO:

A-5-PPL-17-0015

DATE FILED:

4-12-17

DISTRICT:

South Coast

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- ☐ Planning Director/Zoning Administrator
- ☐ City Council/Board of Supervisors
- ☐ Planning Commission
- ☒ Other

6. Date of local government's decision: 3/9/2017

7. Local government's file number (if any): 16-14

SECTION III. Identification of Other Interested Persons

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

William Herriott, Power System Superintendent
Los Angeles Department of Water and Power
111 North Hope Street, Room # 856
Los Angeles, California 90012

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

(1) See Addendum 1

(2)

(3)

(4)

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

SECTION IV. Reasons Supporting This Appeal

PLEASE NOTE:

- Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section.
- State briefly **your reasons for this appeal**. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)
- This need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

See Addendum 2

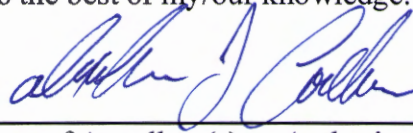
**ADDENDUM 1 TO APPEAL OF
16974 SUNSET LLC TO
COASTAL DEVELOPMENT PERMIT 16-14
(CCC Post-Cert No. 5-PPL-17-0030)**

1. Los Angeles Department of Water and Power
John Ferraro Building (LADWP)
111 N Hope St.,
Los Angeles, CA 90012
2. Chu Family Living Trust
16991 Sunset Blvd.,
Pacific Palisades, CA 90272
3. Richard C. Wahlgren
16975 Sunset Blvd.,
Pacific Palisades, CA 90272
4. David Noriani
16969 Sunset Blvd.,
Pacific Palisades, CA 90272
5. Palisades Bay Club
c/o KENT BURTON, ESQ.
BAKER, BURTON & LUNDY, P.C.
515 Pier Avenue
Hermosa Beach, CA 90254-3889
6. Walt Griesser
c/o KENT BURTON, ESQ.
BAKER, BURTON & LUNDY, P.C.
515 Pier Avenue
Hermosa Beach, CA 90254-3889
7. Pacific Palisades Residence Association
PO Box 617,
Pacific Palisades, CA 90272

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or Authorized Agent

Date: April 12, 2017 By: Alexandre Cornelius

Note: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby
authorize

Alexandre Cornelius

to act as my/our representative and to bind me/us in all matters concerning this appeal.

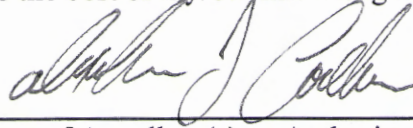
Signature of Appellant(s)

Date: April 12, 2017 By: Manager of the Appellant

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or Authorized Agent

Date: April 12, 2017 By: Alexandre Cornelius

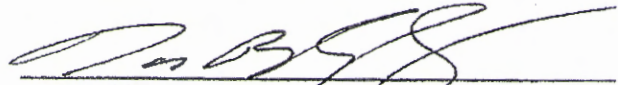
Note: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby
authorize

Alexandre Cornelius

to act as my/our representative and to bind me/us in all matters concerning this appeal.



Signature of Appellant(s)

Date: April 12, 2017 By: Manager of the Appellant

**ADDENDUM 2 TO APPEAL OF
16974 SUNSET LLC TO
COASTAL DEVELOPMENT PERMIT 16-14
(CCC Post-Cert No. 5-PPL-17-0030)**

This addendum is submitted in furtherance of the appeal of 16974 Sunset Blvd, LLC (**"Objecting Party"**) to Coastal Development Permit 16-14 (the **"Permit"**) and the Notice of Decision dated December 5, 2016 (the **"Decision"**) that approved Coastal Development Permit Application Number 16-14 (the **"Application"**) of the Los Angeles Department of Water and Power (**"LADWP"**) for a Temporary Pole Top Distribution Station (**"PTDS"**) located near the intersection of Sunset Boulevard and Marquez Avenue in Pacific Palisades, California. The Permit is attached hereto as "Exhibit I." Objecting Party filed an Objection to the Application and appeared at the hearing on the Application on November 9, 2016 (the **"Objection"**). Objecting Party also filed an appeal with the City of Los Angeles (the **"City"**), dated December 15, 2016 (the **"City Appeal"**). The City Appeal is attached hereto as Exhibit "II." The Decision is attached to the City Appeal as Exhibit "A." The Objection is attached to the City Appeal as Exhibit "B" and the Application is attached to the Objection as Exhibit "1."

I. GROUNDS FOR THE APPEAL AND FACTS SUPPORTING THE SAME.

The Objecting Party appeals from the Permit and from the entire decision set forth in the Decision, which lead to the issuance of the Permit. The Decision states that the project proposed under the Application, the PTDS, "is found to be in conformity with Chapter 3 of the California Coastal Act." There is no support for this conclusion or finding and the Final Staff Report issued on December 5, 2016 (the **"Staff Report"**), lacks material support for its findings and conclusions and cannot be relied upon as basis to approve the Application or for the issuance of a permit for the PTDS. The Final Staff Report is attached to the City Appeal as Exhibit "C."

As summarized in Section III, below, there are substantial issues that warrant granting this appeal and reversing the issuance of the Permit. The Permit should have been denied for reasons set forth herein and/or modified as proposed herein including, but not limited to, to require compliance with the California Coastal Act, California Resources Code §§ 30000, et seq. (the **"Act"**), the Los Angeles General Plan (the **"General Plan"**) and the Brentwood-Pacific Palisades Community Plan (the **"Community Plan"**) by situating the PTDS underground or installing a padmounted transformer and setting a deadline for the removal of the temporary power installation. On this point, the LADWP and the City both state that the PTDS is temporary yet the Staff Report and the Decision do not set forth a deadline as to when the temporary PTDS must be removed and do not define what "temporary" means. As a temporary installation, the conditions for approval of the PTDS must include a deadline for the removal of the same.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26' x 7'5", three 8333-KVA transformers measuring 6'9" tall and 4'7" wide, cross arms, circuit breakers, switches and a controller.

The Objecting Party is an "Aggrieved Person" under the Act.ⁱ A number of community members are also opposed to the PTDS. The Facebook Page for the Pacific Palisades Residence Association with a post opposed to the PTDS shows 900 likes, 48 shares and 6 comments; a Change.Org petition opposing the PTDS has 240 signatures; and the Save the Palisades Bluffs Facebook post shows 192 likes, 27 shares and 18 comments. The screenshots of the Facebook Posts and the Change.Org petition are collectively attached to the Objection as Exhibit "4." In fact another petition entitled "PETITION TO Protect Sunset Boulevard's Scenic Highway!" has collected 590 signatures urging LADWP to install a more aesthetically pleasing alternative to their PTDS and firmly opposing the issuance of a Coastal Development Permit to proceed with construction. The "PETITION TO Protect Sunset Boulevard's Scenic Highway!" is attached hereto as Exhibit "III."

The Objecting Party has reviewed the Permit, Decision, Application and Staff Report and it is familiar with the site of the PTDS as it is adjacent to the residential development site located at 16974 West Sunset Boulevard, Pacific Palisades, California (the "**Property**").ⁱⁱ Since the PTDS and the Property are located within the coastal zone, as confirmed by the City's ZIMAS zoning information system, it is protected by the Act.ⁱⁱⁱ Under § 30003 of the Act – Compliance by Public Agencies, the California Coastal Commission (the "**Commission**"), the City and the LADWP are required to comply with the Act:

All public agencies and all federal agencies, to the extent possible under federal law or regulations or the United States Constitution, shall comply with the provisions of this division."

Thus the Commission, City, LADWP and the Bureau of Engineering (the "**Bureau**") are required to comply with all the provisions of the Act.^{iv}

A. THE DECISION TO APPROVE THE PERMIT APPLICATION DID NOT ADEQUATELY ADDRESS THE PUBLIC COMMENTS AND ISSUES RAISED AT THE HEARING ON THE APPLICATION AND THE OBJECTIONS TO THE SAME.

1. The PTDS is In Violation of the Act and Must Be Removed.

Contrary to Section III., A., 1, of the Staff Report, the unpermitted work at the site for the PTDS violated the Act and is a substantial issue and grounds in and of itself to grant this appeal. Construction of the PTDS began on or about July 6, 2016 *without* a permit complying with the Act and with knowledge

by LADWP that the work required a permit since it was a development as defined under the Act. Section 30106 of the Act – Development, defines “Development” to mean “on land, in or under water, the placement or erection of any solid material or structure ..., *including any facility of any private, public, or municipal utility*;...

As used in this section, “structure” includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line.” (emphasis added.)

Development includes, but is not limited to, the construction of any structure such as an electrical power transmission and distribution line.^v The installation of a PTDS constitutes “development” as defined in the Act thus triggering the requirement of a coastal development permit *prior* to the commencement of any development or installation of any PTDS structures.

Prior to having a coastal development permit issued (or any kind of permit), LADWP vehicles trespassed onto the Property and Objecting Party’s representatives demanded that the LADWP personnel leave the Property immediately, which the LADWP refused. Thereafter, a significant portion of the installation of the PTDS continued without a permit in violation of the Act and only now, after-the-fact, did the LADWP attempt to comply with the Act by filing the Application. In a shocking admission as to how improper the LADWP’s conduct was, Section VI, 1. – Standard Conditions of Approval of the Staff Report, states that the “development shall not commence until a copy of the permit is signed.”^{vi} (emphasis added.) Moreover, the Staff Report requires at Section VI, 6. – Standard Conditions of Approval, that before construction the LADWP, “[o]btain a permit from the State Coastal Commission.”^{vii} Yet, the LADWP commenced construction of the PTDS without a permit from either the City or the Commission, in violation of its own staff report and the Act.

The work performed by LADWP, including the actual installation of three (3) 61’ metal poles for the PTDS and a fourth pole of about 30’, was done in an effort to “ram” the project through in violation of the Act. The LADWP is forcing the PTDS on the Community as a “done-deal,” a fate-acompli’, which the LADWP insists the Community must accept without question because money has already been spent and construction started. This approach by the LADWP is heavy handed, improper, a violation of the Act and the General and Community Plans and a complete trampling of the community’s and property owners’ rights to have a say in “development” within the Coastal Zone. The LADWP is trying to “boot-strap” itself into approval of the Application by violating the law and starting the work and spending rate payer and tax payer money without a valid permit from the City or the Commission. Had LADWP actually followed the correct process (which they have admitted they did not because they sought a coastal permit after they had begun work), the public would have been given a real opportunity to give meaningful input and

potentially change the location or an alternative at grade padmounted or underground development solution could have been pursued. If a private citizen had proceeded to construct 61' structures in the Coastal Zone without a coastal development permit such construction would be red tagged and ordered to be removed. The LADWP is subject to the same provisions of the Act. This "act first and seek permission later" approach of the LADWP is reason enough to grant this appeal and order removal of the PTDS.

Pursuant to Section 30600 of the Act – Coastal Development Permit; Procedures Prior to Certification of Local Coastal Program:

Except as provided in subdivision (e), and in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person, as defined in Section 21066, wishing to perform or undertake any development in the coastal zone, other than a facility subject to Section 25500, shall obtain a coastal development permit."

The Property and the site of the PTDS "is located within the California Coastal Zone and is considered 'single coastal jurisdiction' (i.e. the Coastal Zone of the City of Los Angeles alone)[,]" as defined by the Act, and the draft staff report confirms the same.^{viii} The City and the LADWP were required prior to construction of the PTDS to comply with the § 30600 of the Act.^{ix} This failure is a substantial issue and grounds in and of itself to grant this appeal.

2. The PTDS Violates the Act Due to Visual Blight and Safety.

Contrary to Section III., A., 3, of the Staff Report, the PTDS violates the Act and this is a substantial issue warranting the granting of this appeal. Pacific Palisades is a small scenic community where development proposals should be considered very carefully. The Property and the proposed site for the PTDS are located in a very sensitive area off Sunset Boulevard which is designated as a scenic highway by the City.^x The installation of the PTDS will create a visual blight, contrary to the claims in the Staff Report. The poles are in excess of 60', and are effectively an industrial development negatively impacting the views along Sunset Boulevard and the properties that face along Sunset Boulevard as well as the Property. The poles are out of place and are wholly incompatible with the surrounding residential development. Pictures showing the negative impact of the poles that have been installed at the site of the PTDS are attached to the Objection as Exhibit "5." It must be further noted that the currently installed poles do not yet include one of the most aesthetically impactful parts of the installation – the suspended transformers. The transformers are extremely incompatible, as they are not similar in any way to a typical wooden power pole. Scenic features include views of the estates, which

are negatively impacted by the PTDS. Section 30251 of the Act – Scenic and Visual Qualities of the Coastal Act, provides:

“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.”^{xi} (emphasis added.)

Thus, the scenic and visual qualities of coastal areas are to be considered and protected as a resource of public importance. Permitted development, including development like the PTDS, shall be sited and designed to protect views along the scenic coastal areas. In order to implement this, both the Community Plan and the General Plan require that electrical and utility installations be installed underground. Sunset Boulevard is heavily traveled by many tourists and there are a number of residences that face Sunset Boulevard that will have their residential views marred and interfered with by the PTDS. Moreover, the painting of the PTDS as discussed in the Staff Report will do absolutely nothing to mitigate the negative impact of the three (3) 61’ poles and three (3) transformers of 6.9’ x 4.5’ suspended about 30’ in the air.^{xii} The proposal that paint could somehow mitigate the negative impact of the PTDS is simply not credible giving the visual evidence of the pictures attached to the Objection as Exhibit “5.” The significant, negative visual impact is a substantial issue warranting the granting of this appeal.

The Staff Report did not even address the issue that safety is also a major concern since Sunset Boulevard is a major thoroughfare with a 35 mile per hour speed limit and with an extremely large number of curves. The incident in Arleta, California on February 18, 2016, where a driver was killed when he crashed into a PTDS and the transforms fell on his vehicle, is a real possibility for the present location of the PTDS given the traffic count and volume on Sunset Boulevard and the fact that the PTDS is being situated in the public right of way less than ten feet from the road. The PTDS is unmonitored and contains oil which could leak onto the sidewalk or street. Finally, other areas in the Palisades Community have objected to the PTDS on the basis of concerns about the impact of electromagnetic radiation or fields (“EMF”) created by the transforms and all of those same concerns apply to the site selected for the PTDS as the Property will be developed into single family homes and there

currently is an apartment building with children and families located adjacent to the PTDS site. On this issue, both an underground or at grade installation would reduce the impact of any EMF concerns as recognized in the 2002 report for the IEEE Rural Electrical Power Conference in Colorado Spring, May 2002 attached to the Objection was Exhibit "6" (entirely padmounted installations of distribution stations have less EMF issues than pole mounted installations). These are substantial issues with the Staff Report completely neglects to address.

Since permitted development must be sited and designed to protect views to and along scenic coastal areas, the PTDS should be visually compatible with the character of surrounding areas and should be installed in another location or underground (as required by the General and Community Plans). Moreover, safety concerns have not been addressed by the LADWP or by the Staff Report and the PTDS as proposed is a hazard to the community. This appeal should be granted. These are substantial issues that warrant granting this appeal.

3. The PTDS Violates the Los Angeles General Plan and the Brentwood-Pacific Palisades General Community Plan.

Contrary to Section III., A., 4, the PTDS violates the General and the Community Plans and this is a substantial issue that requires granting this appeal. The General Plan states: "*To the maximum extent feasible, all new or relocated electric . . . utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground.*" ^{xiii} (emphasis added.) Since the PTDS is within 500 feet of the centerline of a Scenic Highway, Sunset Boulevard, the General Plan for the City requires that the project be built underground. Although the LADWP has stated that locating the distribution station underground is not an option due to the size, complexity and risk of water intrusion, as set forth below, the electrical construction consultants of the Objecting Party have indicated that a distribution station can be safely built underground (or at grade and padmounted).

LADWP has not adequately explored the feasibility of an underground solution and it cannot violate the General and Community Plans which require that any new distribution station within 500 feet of the centerline of Sunset Boulevard be built underground or that all new electrical distribution stations be built underground in the Brentwood-Pacific Palisades area. There are no reports or analysis, cost estimates or feasibility analysis to support LADWP's position. Instead, there are simply conclusory statements which show that the LADWP and the Staff Report never even really considered the underground alternative and did not price the same. LADWP must be required to prove, without a shadow of a doubt, that undergrounding is unequivocally infeasible in order to even consider a PTDS along the Scenic Highway, but this has simply not been completed or shared with the public. This appeal should be granted because the LADWP and the Staff Report are devoid of any evidence that these alternatives

were analyzed "to the maximum extent feasible" as required by the General Plan and this is a substantial issue warranting reversal of the issuance of the Permit.

Another substantial issue warranting the granting of this appeal is that the PTDS development violates the Community Plan at Page IV-3 which provides, "UTILITIES 1. Install utilities underground through assessment districts or other funding, when feasible."^{xiv}

LADWP and the Staff Report claim that the PTDS cannot be situated underground or padmounted but the Objecting Party has engaged a consultant, Integrated Environmental Technologies, and they have prepared a schematic for an alternative padmounted solution with pricing and performance specifications similar to the equipment to be installed at the PTDS and the cost for the equipment is only about \$39,000.00. The schematic for the padmounted distribution station, the invoices and the summary report of the consultants are attached as Exhibit "7" to the Objection. The consultants have indicated that an underground or padmounted distribution station is completely feasible but that the LADWP has not, in the Application, meaningfully analyzed or considered the same, nor does the Staff Report. Also, the consultants estimate that the labor cost for a padmounted solution is approximately \$100,000.00 (without taking into account the LADWP's mandated labor policies which could increase the price). Thus, in accordance with the requirements of the General Plan there is a feasible method to install the substation underground or at a minimum as a padmounted distribution station which would address many of the concerns of the Community. The Staff Report contains no evidence as to what the LADWP thinks a padmounted or underground solution will cost and this creates a substantial issue warranting the granting of this appeal as to whether the LADWP "to the maximum extent feasible" analyzed the underground or padmounted alternatives. In addition, the alleged water intrusion issues cited by the LADWP can be addressed with a double wall structure as described and built in Zurich, Switzerland and discussed in the materials provided by Poyray-Electrical Works of Zurich Oerlikon Substation per the report attached as Exhibit "8" to the Objection. The LADWP has not even explained why they believe that there are groundwater or water intrusion issues at the site and the Staff Report contains no evidence or analysis with respect to the same. Frankly, the proposed site is over 100' above sea level and there is no evidence or support for any finding in the Application or Staff Report that there is, in fact, a groundwater or water intrusion condition at the site. Again, the statements in the Application and Staff Report as to water issues are conclusory and speculation without any type of analysis and, certainly, do not meet the "maximum extent feasible" requirement under the General Plan to site electrical distribution stations underground. Thus, there is a substantial issue that the LADWP has not followed the Community Plan and the General Plan to install the distribution station underground or even conducted the required "to the maximum extent feasible" analysis and this warrants granting this appeal for failure to comply with the Community and General Plans.

The PTDS development violates Pages I-2 and 3 of the Community Plan^{xv} which provides the following residential issues:

- Need to protect environmentally sensitive areas, scenic views and scenic corridors.
- Need to improve the visual environment through the development of appropriate design criteria and controls.^{xvi}

The need to protect environmentally sensitive areas and scenic corridors has been violated by the PTDS since it creates a visual blight and is, effectively, an industrial development in a residential area. Also, the need to improve the visual environment through the development of appropriate design criteria and controls has been violated since the appropriate design criteria is an underground installation of the PTDS as dictated by the Community and General Plans. The Staff Report contains no findings and contains no evidence that would refute the conclusion that the PTDS interferes with scenic corridors.

The PTDS development violates the Plan at Page III-7 which provides:

“1-6.6 The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.

* * *

Program: Condition new development to protect views from public roadways and parklands.”^{xvii}

The PTDS development violates the condition that new developments protect views from public roadways since the PTDS is located adjacent to Sunset Boulevard, does not protect the views from a public roadway and creates a negative visual impairment of the scenic views of the residential coastal neighborhood surrounding Sunset Boulevard. Therefore, since installation of the distribution station can be constructed underground as described above, the PTDS violates the General and Community and Plans and the Act which require that development be integrated with and be visually subordinate to natural features and terrain. The Staff Report contains no findings and contains no evidence that would refute the conclusion that the PTDS does not protect the views.

Development of the PTDS also violates sections of the Community Plan on Pages III-15 and 16 which provides:

“COASTAL RESOURCES Development in the Coastal Zone is subject to the provisions of the California Coastal Act. As of 1997, the City had not prepared a local coastal plan (LUP/LCP) for the Pacific Palisades Coastal areas.”

Since the Community Plan incorporates the provisions of the Act, all violations under the Act are also violations of the Community Plan. As described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. Thus, LADWP also violated this section of the Community Plan and the Staff Report does not address this issue. On this basis, there is a substantial issue and this appeal should be granted.

Goal 5 of the Community Plan entitled “PRESERVATION OF THE SCENIC AND VISUAL QUALITY OF COASTAL AREAS,” provides for the following objectives, policies, and programs which have been violated by the PTDS development:

Objective 5-1 To govern the manner in which the City of Los Angeles implements the California Coastal Act of 1976, as well as the establishment of land uses and their subsequent development.

Policies 5-1.1 The location and amount of new development should maintain and enhance public access to the coast.

Program: Permitted development shall be designed to protect views to 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 the visually degraded areas.

Program: Coastal Development Permits are required for new development which establish conditions for new development.

The PTDS development violates the objective of the Community Plan of implementing the provisions and requirements of the Act since, as described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. The PTDS development also violates the objective of the Community Plan regarding protecting scenic coastal areas by building the distribution station above ground on 61' poles creating visual blight and placing an industrial development in a residential area. The PTDS development further violates the objective of the Community Plan by not being visually compatible with the character of surrounding areas, by building

the PTDS above ground on poles creating negative visual impacts and by interfering with scenic coastal areas instead of constructing the distribution station underground. The PTDS as approved also violates the objective of the Community Plan by not obtaining a coastal development permit for a public works projects and by not analyzing or setting forth any findings that the PTDS is consistent with the Community Plan.

The Staff Report claims without any basis in fact whatsoever that "[t]he majority of the project is underground, as stated at the public hearing, and will be screened to reduce visibility." This statement/finding is neither supported by anything in the record nor by reality. The PTDS is not underground, its very name "Pole Top" denotes that it is above ground. A simple review of the pictures of the PTDS installation, attached as Exhibit "5" to the Objection, confirms that the whole PTDS is above ground (there may be some concrete footing for the poles and underground conduits or wires, but the actual transformers are above ground on poles. The PTDS consists of three 61' metal poles, a 30' metal pole, a large metal rack that is 26' x 7'5" and three very large and bulky transformers that are 6'9" x 4'7"). Thus, the actual transformers and poles that hold the items that create the most visual blight are all above ground and visible from Sunset Blvd. and the surrounding properties. Moreover, as to screening, all the LADWP proposes to do is to paint the poles for "screening." Painting is not screening and no amount of paint can minimize the visual effects of the PTDS.

Since the LADWP failed to follow several sections and requirements of the Community and General Plans and the Staff Report contains no evidence to support its findings on these matters, this creates a substantial issue that warrants the reversal of the issuance of the Permit, and the LADWP should be ordered to comply with the General Plan and the Community Plan.

4. The LADWP has Not Complied with CEQA and Compliance is a Requirement of a Permit for the PTDS.

Contrary to Section III., A., 5, of the Staff Report, the PTDS violates the California Environmental Quality Act ("CEQA")^{xviii} which is a statewide policy of environmental protection. CEQA does not directly regulate land uses, but instead requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and adopt all feasible measures to mitigate those impacts. CEQA makes environmental protection a mandatory part of every California state and local agency's decision-making process. The Staff Report without any analysis or without commenting upon the analysis offered by the Objecting Party claims that the Application complies with CEQA. This is not true and there is no evidence to support this finding and this creates a substantial issue warranting reversal of the issuance of the Permit.

A notice of exemption (“NOE”), attached as Exhibit “9” to the Objection, was filed by LADWP on May 25, 2016. The exemption was based upon two grounds: 1) as an electrical and other utility extension, and 2) as an emergency project. The first ground cited is that the project is subject to a Class 3 categorical exemption for “electrical . . . and other utility extensions[.]”^{xix} However, a PTDS is plainly not an electrical or utility “extension,” but rather a new facility and therefore not exempt. The second ground cited is that the project qualifies for a statutory exemption as an emergency project. There has been no evidence that would suggest that placing a PTDS adjacent to the Property was necessary to prevent or mitigate an “emergency.”

“Emergency,” as defined by CEQA, means a “sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. ‘Emergency’ includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”^{xx} Under case law, the definition of an emergency is limited to an occurrence and not a condition, meaning that the occurrence must involve a clear and imminent danger, demanding immediate action.^{xxi} The decision to place the PTDS in front of the Property was the result of years-long, prolonged process in response to consistent outages in the Pacific Palisades. In fact, in 2012, LADWP first considered constructing a power distribution station on its property near Marquez Charter School, on Marquez Avenue. The decision to place the PTDS adjacent to the Property was not an action taken in response to a sudden or unexpected occurrence necessary to prevent or mitigate an emergency power outage in the Pacific Palisades but, rather, was a decision reached over an extended period of time in response to a known condition. The Staff Report does not even address or comment on these issues whatsoever and the failure of the Staff Report to address these issues as the impropriety of the NOE and its invalidity creates a substantial issue that warrants the reversal of the issuance of the Permit.

The NOE is invalid because the LADWP was required to comply with all CEQA procedures in order to, among other things, identify the significant environmental impacts of the PTDS on the community, and to avoid or mitigate those impacts. As such, this appeal should be granted due to the failure of the LADWP to comply with CEQA and failure of the Staff Report to address or analyze the invalidity of the NOE.

Finally, the NOE was filed and posted before the LADWP sought the Permit and the NOE was not tied to any permit or public notice to the neighbor about the pending construction of the PTDS. By divorcing the NOE from the permit process the community had no real notice of the pending construction of the PDS or that the LADWP was contending that the PTDS did not need a CEQA review and was exempt. This LADWP has acknowledged that they were wrong and did in fact need a permit to install the PTDS and the fact that the NOE was filed and not tied to a permit denied the community any meaningful opportunity

to review the NOE or the PTDS in light of the requirements of CEQA which were clearly not met. There is a substantial issue of whether the NOE is valid or should be deemed sufficient where the LADWP made a conscious decision not to apply for a permit at the time that it posted the NOE thereby denying the community any meaningful right to review or comment on the NOE in light of the proposed development of the PTDS.

5. The City and its Departments and Divisions Had a Conflict of Interest in Ruling on the Application and/or the City Appeal.

Contrary to Section III., A., 2, of the Staff Report, the unpermitted work at the site for the PTDS created a conflict of interest for the City, the LADWP and the Bureau and is a substantial issue warranting granting of this appeal. The LADWP claims it has already spent \$250,000.00 (for which there is no back up or support) on installing the PTDS. However, the City (of which the LADWP is a division/agency) and the Bureau not only filed the Application seeking the permit, but at the same time conducted the hearing on the Application and decided to approve the permit, and subsequently conducted the hearing on the City Appeal of the Decision. As such, the City had a conflict of interest and was highly motivated to approve the Application and Permit despite it violating the Act, the General Plan, the Community Plan and CEQA. If the City did not approve the Application, then one of its agencies - the LADWP - could have been accused of misuse of public rate payer funds because the LADWP commenced work on the PTDS without first obtaining a permit from the City and a coastal development permit from the Commission. This issue clouded the City's and the Bureau's judgment and raised the specter of the City having a conflict of interest in hearing and ruling on the Application and the City Appeal or, at a minimum, gives the appearance of a conflict of interest. Under these circumstances, the Commission should grant this appeal and reverse the approval of the Permit.

The Coastal Act Section 30811 – Restoration Order; Violations, provides:

“In addition to any other authority to order restoration, the commission, a local government that is implementing a certified local coastal program, or a port governing body that is implementing a certified port master plan may, after a public hearing, order restoration of a site if it finds that the development has occurred without a coastal development permit from the commission, local government, or port governing body, the development is inconsistent with this division, and the development is causing continuing resource damage.”^{xxii} The Coastal Act empowers local governments to address permit violations by issuing an order of restoration of a site if it finds that the

development has occurred without a coastal development permit.

Since the LADWP failed to follow the law to which the public is required to adhere, and brazenly moved forward with the development of the PTDS without a permit from the City and a permit from the Commission, this appeal should be granted and the Permit should be denied.

6. The LADWP Has Violated Due Process.

Contrary to Section III., A., 6, of the Staff Report, the LADWP violated the Act and state and federal constitutional due process by failing to give sufficient notice and by failing to make materials and accurate information related to the Application available to the public in a timely manner and by holding the hearing on the minimum notice after the LADWP had already constructed a significant portion of the PTDS without the proper permit. Pursuant to Section 30320 of the Act – Findings and Declarations:

“(a) The people of California find and declare that the duties, responsibilities, and quasi-judicial actions of the commission are sensitive and extremely important for the well-being of current and future generations and that the public interest and principles of fundamental fairness and due process of law require that the commission conduct its affairs in an open, objective, and impartial manner free of undue influence and the abuse of power and authority. It is further found that, to be effective, California's coastal protection program requires public awareness, understanding, support, participation, and confidence in the commission and its practices and procedures. Accordingly, this article is necessary to preserve the public's welfare and the integrity of, and to maintain the public's trust in, the commission and the implementation of this division.

(b) The people of California further find that in a democracy, due process, fairness, and the responsible exercise of authority are all essential elements of good government which require that the public's business be conducted in public meetings, with limited exceptions for sensitive personnel matters and litigation, and on the official record. Reasonable restrictions are necessary and proper to prevent future abuses and misuse of governmental power so long as all members of the public are given adequate opportunities to present their views and opinions to the commission through written or oral communications on the official

record either before or during the public hearing on any matter before the commission.”^{xxiii}

The Act imposes duties, responsibilities and quasi-judicial actions on local governments issuing development permits. These responsibilities are sensitive and extremely important for the well-being of current and future generations. The public interest and principles of fundamental fairness and due process of law under the state and federal constitutions require that the City, LADWP and Commission conduct their affairs in an objective and impartial manner free of undue influence and in accordance with the law. Therefore, the Act states that to be effective, California's coastal protection program requires public understanding, support, participation, and confidence in the commission and its practices and procedures.

In this case, the draft staff report was only available one week before the public hearing and did not provide the public with sufficient time to read, review and prepare comments to the draft staff report. Due process and principles of fundamental fairness require that the public be provided with sufficient information and with sufficient time to properly evaluate the effects of a development permit application. There is a substantial issue warranting reversal of the Permit related to the draft staff report not being available until after the hearing was noticed.

Further, some of the information in the Staff Report directly conflicted with the Application causing confusion and does not provide the public with sufficient information to fully understand the Application, consider alternatives, or provide adequate informed opinions at the public hearing. For example, the Staff Report states that the “project cost is approximately \$930,000.00”^{xxiv} while the Application states that the “estimated cost of development is \$276,000.00.”^{xxv} The difference of over \$650,000 does not allow the public to evaluate the development or its alternatives properly. There is no basis or explanation in the Staff Report as to how the \$930,000.00 figure was calculated or what it is based on and this lack of support for this finding creates a substantial issue as to the actual budget and cost of the PTDS and warrants reversal of the Permit and granting of this appeal.

In fact, if the project budget is indeed \$930,000.00, then the distribution facility could certainly have been placed underground or padmounted. Failing to provide sufficient accurate information regarding such a significant factor concerning the development fails to allow participation and destroys any confidence in the practices and due process procedures of the permit process in which the City engaged in issuing the Decision and the Permit. In addition, the public is unable to adequately present alternatives or respond to the LADWP's claims that an underground or padmounted facility is too expensive without actually knowing what the DWP is actually spending for the PTDS. There is no basis or explanation in the Staff Report as to how the \$930,000.00 figure was calculated. This unsupported finding creates a substantial issue as to the actual

budget and cost of the PTDS and whether the public was provided accurate information and is a violation of due process and warrants reversal of the issuance of the Permit and granting of this appeal.

Another example of information in the Staff Report directly conflicting with the Application and causing confusion is the misleading statement in the Application that the applicant "proposes to install" the PTDS and the failure of the Application to disclose that the LADWP already started with the development and completed a significant portion of the above ground construction of the PTDS. While the Staff Report discloses the fact that the LADWP has already "*installed*" a PTDS, the Application states that the applicant "*proposes to install*" the PTDS. These two statements are confusing, and if the Application is read alone, it is misleading regarding a material fact as to the status of the development of the PTDS. To complicate matters further, the staff report contradicts itself internally by saying, in Section VI - Standard conditions of approval, that the "development *shall not commence* until a copy of the permit is signed"^{xxvi} but the report previously states that the LADWP has already "*installed*" the PTDS.^{xxvii} These inconsistencies make the materials provided impossible to reconcile and create a substantial issue as whether the Application or the Staff Report contains the correct information and the public cannot meaningfully respond to the Application without having accurate information such that the City proceeding with the Application in light of these inconsistencies was a denial of due process which is a substantial issue warranting the reversal of the issuance of the Permit.

Additional contradictory and faulty information is contained in the Application related to the actual location of the PTDS. Attachment A to the Application, the Assessor's Parcel Map (Exhibit "1" to the Objection), shows the PTDS being installed at the corner of Marquez Ave. and Sunset Blvd. In addition, Attachment D to the Application, Map Showing Single Jurisdiction Boundary (Exhibit "1" to the Objection), and shows the PTDS being installed at the corner of Marquez Ave. and Sunset Blvd. However, the actual installation of the PTDS was not on the corner of Marquez Ave. and Sunset Blvd. and the pictures attached as Exhibit "5" to the Objection clearly show that the PTDS was installed in the middle of the Parcel Map (Attachment A to the Application), towards the South East corner such that Attachment A and D to the Application are misleading and, in fact, present a misrepresentation as to where the PTDS was actually constructed. Moreover, this means that the Application itself is misleading because it claims that the PTDS is in the single jurisdiction district for the Act and this is untrue and incorrect. The location of the actual installation of the PTDS is in the area on Attachment D to the Application that is shown to be in the dual jurisdiction under the Act. This misleading information and the failure of the LADWP to accurately depict where it had already installed the PTDS and the failure of the Staff Report to address this issue at all is a substantial issue that warrants the granting of this appeal and the reversal of the issuance of the Permit.

In addition, as outlined above, the NOE was filed by the LADWP without first applying for the Permit and the NOE and the claimed exemption from CEQA are invalid because the community had no meaningful opportunity to understand that the NOE related to the construction of the PTDS because the normal notice procedures for a permit were not complied with by the LADWP at the time that it filed the NOE.

Finally, the PTDS development is described in both the Application and the draft staff report as being "temporary."^{xxviii} But no definition or explanation is provided as to how long the LADWP considers "temporary" to mean. The duration of the proposed "temporary" PTDS development is a significant fact that has been omitted from both the Application and the Staff Report. Although the LADWP may claim that the exact date that the PTDS will be removed cannot be determined at this time, at a minimum, an outside date should have been required for approval of the Application in order to provide LADWP an incentive to complete the permanent distribution station, and in order to provide the public a better understanding as to how long the PTDS development will interfere with their properties and when the other negative impacts to the community will terminate. The omission from the Staff Report of any explanation as to what the word "temporary" means in the context of the PTDS and the lack of any deadline for the expiration of the permit create substantial issues as to the violation of due process such that the issuance of the Permit should be reversed and this appeal granted. At a minimum an outside date for the removal of the PTDS or the expiration of the Permit should be imposed and it should be for no longer than four (4) years after the issuance of the final permit.

7. The LADWP Has Not Adequately Investigated The Site and Minimized Adverse Impacts.

The Staff Report did not even address in Section III the Public Comment that the LADWP has done no analysis or testing to determine if the PTDS development will cause erosion or instability or if it would require structures that alter the land forms or otherwise negatively impacts the surrounding properties.¹ This Public Comment was included in the Objection filed by the Objecting Party and the Staff Report's failure to address the same creates a substantial issue warranting reversal of the issuance of the Permit.

¹ The installation of the PTDS in this particular location may have negative impact on the planned development of the Property. The present intention is to develop the Property into three single-family homes. The current planned location of the PTDS interferes with access to the Property from Sunset Boulevard and could impact the Property, a fact that will result in a taking of the Property for public use without just compensation, which is illegal. Due to the short period in which to object and the claimed emergency nature of the PTDS, the Objecting Party has not been able to fully investigate this issue and reserves its rights in all regard as to whether the PTDS is a taking and whether it is an inverse condemnation and the damages flowing therefrom.

Since the development of the PTDS commenced without CEQA evaluation or a coastal development permit, the construction of the 61' poles without a valid development permit violates the Act and nowhere in the Application of the Staff Report does it show that any reports or investigations were undertaken to determine if the PTDS development will cause erosion or instability or if it would require structures that alter the land forms or otherwise negatively impacts the surrounding properties.

Pursuant to Section 30253 of the Act – Minimization of Adverse Impacts:

“New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b) 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 requires the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.”^{xxix}

The Act requires all of the following findings, none of which appear in the Application or the Staff Report or if they do there is no evidentiary support for the same: assurance of stability and structural integrity, such that the development will 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.

LADWP has not addressed the adverse impact of the PTDS development since it failed even to consider these issues by proceeding under the invalid NOE and without a coastal development permit and there is a substantial issue that there is no evidence to support any finding that the PTDS will 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. As such, this appeal should be granted and the issuance of the Permit should be reversed.

8. The LADWP Has Failed to Adequately Analyze Alternatives.

The Staff Report did not even address in Section III the Public Comment that the LADWP did not adequately analyze alternatives and this creates a substantial issue warranting reversal of the issuance of the Permit. The original proposed location for the PTDS was on land owned by the LADWP near an elementary school on Marquez Avenue.^{xxx} The elementary school location was considered by LADWP up until May 1, 2016.^{xxxi} Thereafter, an alternative was identified at 1700 Sunset, the Gabay property, and another alternative was

identified at the current site adjacent to the Property, referred to as the old Bernheimer Gardens. In the Palisades News as recently as May 20, 2016, attached as Exhibit "10" to the Objection, the Property was still listed as the fourth alternative identified by the task force.^{xxxii} Pursuant to Section 30250 of the Act – Location; Existing Developed Area:

"(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas."^{xxxiii}

Thus, the Act requires that new industrial development, which the PTDS is, shall be located where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. Also, where feasible, new hazardous industrial development shall be located away from existing developed areas. Therefore, relocating the PTDS to another alternative location was required by the Act and the LADWP and the Staff Report fail to adequately address this creating a substantial issue warranting reversal of the issuance of the Permit.

The Community Plan and the General Plan require that electrical distribution developments on Sunset Boulevard be built underground and the Staff Report as a condition should have required the LADWP to resubmit an application providing for an underground distribution station or provide all of the information showing that the LADWP analyzed the same to the "maximum extent feasible."

Moreover, the IEEE Report indicates that a padmounted at grade distribution substation can be constructed for approximately \$350,000.00 (See, Section II. BENEFITS 10 Cost), IEEE Report, Exhibit "6" to the Objection.^{xxxiv}

Another alternative that the LADWP and the Staff Report did not consider was that the distribution station be constructed slab on grade. This alternative, while not addressing all community concerns, is more cost effective and partially addresses the visual blight concern. Consultants retained by the

Objecting Party have prepared the summary report and the schematic for a grade level padmounted distribution station as described and set forth in Exhibit "7" to the Objection. In addition, as set forth in the IEEE Report, as compared to pole mounted distribution stations, padmounted substations can now be built smaller with reduced cost, easier construction, greater flexibility, and improved safety and aesthetics. The IEEE Report also states that the padmounted substations are pleasing to the eye, making them a better fit in residential areas, highly scenic areas, coastal communities due to sea salt and moisture damage, and environmentally sensitive areas. The at grade construction of the distribution station could be landscaped to address the physical screening requirement of the General Plan and the Community Plan.^{xxxv} None of these alternatives were addressed in the Application or the Staff Report and they were raised by the Objecting Party in the Objection and the failure of the LADWP and the Staff Report to consider the same and analyze the same to the "maximum extent feasible," as required by the General Plan, is a substantial issue on appeal and warrants reversal of the issuance of the Permit.

B. THE FINDINGS IN SECTION III OF THE STAFF REPORT ARE NOT SUPPORTED BY THE RECORD OR BY THE APPLICATION.

The following is an analysis of the findings in Section III of the Staff Report and explains why there is no support for the same such that each finding lacking evidentiary support in the record warrants reversal of the issuance of the Permit. Based on the following analysis, this appeal should be granted and the Decision reversed.

1. The Development is in Conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

a. The Finding That There Are No Negative Visual Impacts By The PTDS Or That They Can Be Screened By Paint Is Not Supported by Record (Staff Report P. 5).

As made clear in the Section II.A.1-8, above, related to the adverse impact and visual appearance of the PTDS, it certainly does not comply with the Act and the Applicant has made no serious efforts to mitigate its negative impacts. Any findings in the Staff Report that the PTDS complies with the Act are not based on substantial evidence or anything contained in the Application or set forth at the hearing on this matter.

Section 30251 of the Act – Scenic and Visual Qualities of the Coastal Act, provides:

"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.” xxxvi (emphasis added.)

The PTDS is in essence an industrial facility and the Property and area in which it is proposed to be installed is a residential area. The Act requires the PTDS *“to be visually compatible with the character of surrounding areas.”* A review of the pictures attached as Exhibit “5” to the Objection makes it clear that the PTDS is not compatible with the character of the surrounding area and is, in fact, an installation which looks completely out of place in this residential neighborhood.

The LADWP in the Application at page 2 indicates that there are 34 - PTDSs throughout the City. However, LADWP has not referenced a single location where a PTDS has been installed in a Coastal Zone within the City of Los Angeles. When asked at the hearing to identify a single location in the Coastal Zone in the City where a PTDS was installed, the representatives of the LADWP were unable to do so.

Page 5 of the Staff Report States:

“According to the permit application, measures have been implemented to help screen the structures. Their placement is where other utility poles and lights are located. The poles were painted to blend in with the surroundings. There are no unobstructed views of the ocean from the project site. No adverse impacts to scenic and visual qualities of the coastal area are expected (Figures 3 and 4).”

Placing the PTDS with 61’ high Poles and three transformers that are 6’9” tall and 4’7” wide near other poles does not “screen” anything. The painting of the poles is not “screening” and it the absolute minimum that could possibly be conceived of. As shown clearly by the pictures attached as Exhibit “5” to the Objection, the LADWP’s proposal to paint the poles and transformers does not mitigate negative visual impacts and any finding claiming that it does, is not supported by substantial evidence or anything in the record other than the bare allegations of an employee of the LADWP. There is no report supporting this screening, there is no treatise or other materials showing that there is an industry standard that painting poles can minimize the impact in a coastal area, there is no explanation of what paint will be used or how or why it will serve to minimize the negative visual impacts.

There are massive impacts to the scenic and visual qualities of the Coastal Zone. This has been attested to by hundreds of neighborhood constituents who have voiced opposition to the PTDS installation, in favor of a more aesthetically palatable alternative

As made clear in the Section II.A.1-8, above, the finding at Page 5 of the Staff Report that, "No Adverse Impacts to the scenic and visual qualities of the coastal area are expected" is not supported by the Application, anything discussed at the hearing and there is no evidence to support the same and significant evidence to the contrary such that this is a substantial issue warranting the granting of this appeal and the reversal of the issuance of the Permit.

b. The Finding That The Construction Will Not Involve The Transport Of Hazardous Substances Is Not Supported by Record (Staff Report P. 4).

At page 4 of the Staff Report the following finding is made: "Project construction will not involve the transport of hazardous substances and, thus, there will be spillage of crude oil, gas, petroleum product or hazardous substances as prohibited by the PRC Section 30232." There is absolutely no reference in the Application or the record from the hearing to support such a finding. The Staff Report contains no reference to any materials and provides no backup whatsoever as to how this finding and conclusion was reached. Thus, there is no substantial evidence or any evidence for this finding.

Moreover, contrary to this finding, the proposed PTDS is an industrial project with three 833KVA electrical transformers. No evidence or explanation has been put forth as to which manufacturer makes the transformers and as to what materials are used to manufacture the same. Such transformers are by their very nature constructed of hazardous substantives include oil, petroleum products, metallic and electrical devices and plastics and insulation. Without knowing the exact manufacturer of the transformers and without reviewing the list of materials or specifications used to assemble the same, the Staff cannot make this finding and there is no evidence whatsoever to support the same in the Application, Staff Report or the record from the hearings. As such, the lack of any evidentiary support for this finding creates a substantial issue warranting that this appeal be granted and the issuances of the Permit reversed.

c. The Finding That The Project Would Not Affect Geologic, Flood or Fire Risks Is Not Supported by Record (Staff Report P. 5).

As made clear in the Section II.A.7, above, no analysis was done whatsoever in the Application or the Staff Report and no evidence, reports or other materials are cite that would provide a basis for the finding that the PTDS will not affect geological, flood or fire risks. This is simply a bare allegation without reference to anything that could support the same. As such there is a substantial issue as to whether the PTDS will affect geological, flood or fire risks and this warrants granting of this appeal and reversing the issuance of the Permit.

d. The Finding That The Notice of Exemption Excuses Any Additional Evaluations Under CEQA Is Not Supported by Record (Staff Report P. 7).

As made clear in the Section II.A.4, above, no analysis was done whatsoever in the Application or the Staff Report as to the underlying claim that there was an “emergency” or that the PTDS quailed as an “utility extension” as defined under CEQA that would exempt the PTDS from CEQA. The Staff Report simply indicates that the staff reviewed and considered the NOE, but it does not indicate that they compared the NOE and the stated basis for the exemption to the actual statutory requirements of CEQA for an emergency or “utility extension” exemption. The fact that those definitions do not support the exemptions claimed under the NOE is not analyzed or discussed in any manner. The failure to do so makes this finding unsupported and creates a substantial issue warranting the granting of this appeal and the reversal of the issuance of the Permit.

II. SUMMARY OF SUBSTANTIAL ISSUES.

1. Contrary to Section III., A., 1, of the Staff Report, the unpermitted work at the site for the PTDS violated the Act and is a substantial issue and grounds in and of itself to grant this appeal.
2. Contrary to Section III., A., 3, of the Staff Report, the PTDS violates the Act due to, among other things, significant, negative visual impact and this is a substantial issue warranting the granting of this appeal.
3. The Staff Report did not address the safety risks of PTDS falling or being hit or of the oil and chemicals and materials used to construct the PTDS and to manufacture the transformers and these are all substantial issues which the Staff Report completely neglects to address and this warrants the granting of this appeal.
4. Contrary to Section III., A., 4, the PTDS violates the General and the Community Plans and this is a substantial issue that requires granting this appeal and reversing the issuance of the Permit.
5. The Application and the Staff Report are devoid of any evidence that the undergrounding of the distribution station or other alternatives to the PTDS were analyzed “to the maximum extent feasible” as required by the General Plan and this is a substantial issue warranting granting of this appeal and reversal of the issuance of the Permit.
6. The PTDS development violates the Community Plan at Page IV-3 which provides, “UTILITIES 1. Install utilities underground through assessment districts or other funding, when feasible” and there is no evidence to support any finding as to compliance with this requirement and this is a substantial issue warranting granting of this appeal and reversal of the issuance of the Permit.

7. The Staff Report and Application contain no evidence as to what the LADWP thinks a padmounted or underground solution will cost and this creates a substantial issue warranting the granting of this appeal as to whether the LADWP "to the maximum extent feasible" analyzed the underground or padmounted alternatives.
8. Since the Community Plan incorporates the provisions of the Act, all violations under the Act are also violations of the Community Plan. As described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. Thus, the LADWP also violated this section of the Community Plan and the Staff Report does not address this issue. On this basis, there is a substantial issue and this appeal should be granted and the issuance of the Permit reversed.
9. Since the LADWP failed to follow several sections and requirements of the Community and General Plans and the Staff Report contains no evidence to support its findings on these matters, this creates a substantial issue that warrants the reversal of the issuance of the Permit and the LADWP should be ordered to comply with the General Plan and the Community Plan.
10. The Staff Report without any analysis or without commenting upon the analysis offered by the Objecting Party claims that the Application complies with CEQA. This is not true and there is no evidence to support this finding. This creates a substantial issue warranting reversal of the issuance of the Permit.
11. The Staff Report simply indicates that the staff reviewed and considered the NOE, but it does not indicate that they compared the NOE and the stated basis for the exemption to the actual statutory requirements of CEQA for an emergency or "utility extension" exemption. The fact that those definitions do not support the exemptions claimed under the NOE is not analyzed or discussed in any manner by the Staff Report. The failure to do so makes this finding unsupported and creates a substantial issue warranting the granting of this appeal and the reversal of the issuance of the Permit.
12. The NOE was filed at time when the LADWP stated that it did not need a permit to develop the PTDS and the NOE was not tied to any permit and the normal community notice procedures involved with the issuance of a permit were not complied with respect to the NOE and it was divorced from the permitting process thereby denying the community any meaningful notice or ability to understand that the NOE related to a project to be built in Pacific Palisades. A community member would have had to review the City of Los Angeles' website and other records would have had to coincidentally see the NOE and read and review the same to understand that it related to the development of a PTDS in Pacific Palisades as opposed to the

permitting process where there is public notice sent directly to the impacted landowners and community members. This never happened with respect to the NOE. This creates a substantial issue warranting reversal of the issuance of the Permit.

13. Contrary to Section III., A., 2, of the Staff Report, the unpermitted work at the site for the PTDS created a conflict of interest for the City, the LADWP and the Bureau and is a substantial issue warranting granting of this appeal.
14. There is a substantial issue related to due process and warranting reversal of the issuance of the Permit because the draft staff report was not available until after the hearing was noticed.
15. Some of the information in the Staff Report: (1) directly conflicted with the Application causing confusion, (2) did not provide the public with sufficient information to fully understand the Application or to consider alternatives, (3) did not provide adequate information for the public to meaningfully participate in the public hearing and (4) is a violation of due process. For example, the Staff Report states that the "project cost is approximately \$930,000.00," while the Application states that the "estimated cost of development is \$276,000.00." The difference of over \$650,000 does not allow the public to evaluate the development or its alternatives properly. There is no basis or explanation in the Staff Report as to how the \$930,000.00 figure was calculated or what it is based on and this lack of support for this finding creates a substantial issue as to the actual budget and cost of the PTDS and warrants reversal of the issuance of the Permit and granting of this appeal.
16. Misleading information in the Application as to the location of the construction of the PTDS (in the single jurisdiction area) and the failure of the LADWP to accurately depict where it had actually already installed the PTDS (in the dual jurisdiction area) and the failure of the Staff Report to address this issue or even note it is a substantial issue that warrants the granting of this appeal and the reversal of the issuance of the Permit.
17. The omission from the Staff Report of any explanation as to what the word "temporary" means in the context of the PTDS and the lack of any deadline for the expiration of the permit create substantial issues as to the violation of due process and highlight the lack of any evidentiary support for any finding that the PTDS will, in fact, be "temporary" such that the Decision should be reversed and this appeal granted. At a minimum an outside date for the removal of the PTDS or the expiration of the permit should be imposed and it should be for no longer than four (4) years after the issuance of the final permit.

18. LADWP has not addressed the adverse impact of the PTDS development since it failed even to consider these issues by proceeding under an invalid NOE and without a coastal development permit. Thus, there is a substantial issue in that there is no basis or evidence to support any finding that the PTDS will 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. As such, this appeal should be granted and the issuance of the Permit should be reversed.
19. The Staff Report did not even address in Section III the Public Comment that the LADWP did not adequately analyze alternatives and this creates a substantial issue warranting reversal of the issuance of the Permit.
20. Relocating the PTDS to another alternative location was required by the Act and the LADWP and the Staff Report fail to adequately address this creating a substantial issue warranting reversal of the issuance of the Permit.
21. As made clear in the Section II.A.1-8, above, the finding at Page 5 of the Staff Report that, "No Adverse Impacts to the scenic and visual qualities of the coastal area are expected" is not supported by the Application, anything discussed at the hearing and there is no evidence to support the same and significant evidence to the contrary such that this is a substantial issue warranting the granting of this appeal and the reversal of the issuance of the Permit.
22. At page 4 of the Staff Report the following finding is made, 'Project construction will not involve the transport of hazardous substances and, thus, there will be spillage of crude oil, gas, petroleum product or hazardous substances as prohibited by the PRC Section 30232.' There is absolutely no reference in the Application or the record from the hearing to support such a finding. The Staff Report contains no reference to any materials and provides no backup whatsoever as to how this finding and conclusion was reached. Thus, there is no substantial evidence or any evidence for the finding.
23. Contrary to the finding in the Staff Report, the proposed PTDS is an industrial project with three 833KVA electrical transformers. No evidence or explanation has been put forth as to which manufacturer makes the transformers and as to what materials are used to manufacture the same. Such transformers are by their very nature constructed of hazardous substances include oil, petroleum products, metallic and electrical devices and plastics and insulation. Without knowing the exact manufacturer of the transformers and without reviewing the list of materials or specifications used to assemble the same, the Staff cannot make this finding and there is no evidence

whatsoever to support the same in the Application, Staff Report or the record from the hearings. As such, the lack of any evidentiary support for this finding creates a substantial issue warranting that this appeal be granted and the issuance of the Permit reversed.

24. As such, there is a substantial issue as to whether the PTDS will affect geological, flood or fire risks because there was no CEQA compliance and no reports or analysis whatsoever in the Application or the Staff Report and no evidence cited to support any such findings and this warrants granting the appeal and reversing the issuance of the Permit.

III. CONCLUSION.

Based on the foregoing, the Objecting Party submits that the Permit and the Decision approving the Application must be reversed because the PTDS violates the Act, the Community Plan, the General Plan, CEQA and adversely impacts the community and the Property and the LADWP should be required to install a padmounted or underground facility. The Application and Staff Report are lacking material information; contain wrong information and/or conflicting information. The Staff Report lacks support for the vast majority of its findings. These all create substantial issues that warrant the granting of this appeal, the reversal of the Decision and the reversal of issuance of the Permit. In the alternative, if the Commission is inclined to deny this appeal, it should only do so on the condition that the approval of the Permit for the PTDS be modified to require as a condition of approval that the permit for the PTDS expire without an option for renewal no more than four (4) years after its issuance.

Sincerely,

/s/ Alex Cornelius
Alex Cornelius
COSTELL & CORNELIUS LAW CORP.
For 16974 Sunset, LLC

ⁱ There are concerned citizen who have signed a petition objecting to the PTDS and they also objected at the hearing.

ⁱⁱ Property consisting of 4 contiguous parcels with the following APS Numbers: 44115-023-009, 4415-023-010, 4415-022-007, and 4415-021-004.

ⁱⁱⁱ Coastal Act, California Public Resources Code §§ 30000 *et seq.*

^{iv} California Public Resources Code §30003 - Compliance by public agencies

^v California Public Resources Code §30106 - Development.

^{vi} Staff Report prepared by Catalina Hernandez, Section IV (1) on Page 8.

^{vii} Staff Report prepared by Catalina Hernandez, Section IV (6) on Page 8

^{viii} Staff Report prepared by Catalina Hernandez, Page 2.

^{ix} California Public Resources Code §30600 - Coastal development permit; procedures prior to certification of local coastal program. Note that the exception in section (e) does not apply as discuss later in the letter under the definition of "Emergency."

^x Staff Report prepared by Catalina Hernandez, Page 5, as per the Los Angeles General Transportation Plan.

^{xi} California Public Resources Code §30251 - Scenic and visual qualities.

^{xii} Staff Report prepared by Catalina Hernandez, Page 5.

^{xiii} Staff Report prepared by Catalina Hernandez, Page 5, and according to the Mobility Plan 2035, an element of the General plan of the City of Los Angeles.

^{xiv} Ibid., Page IV-3.

^{xv} Brentwood-Pacific Palisades Community Plan part of the General Plan - City of Los Angeles.

^{xvi} Ibid., Page I-2 and 3.

^{xvii} Ibid., Page III-7.

^{xviii} CEQA (California Public Resources Code §§21000–21189) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§15000–15387).

^{xix} CEQA Guidelines §15303(d).

^{xx} CEQA §21060.3.

^{xxi} Los Osos Valley Associates v. City of San Luis Obispo, 30 Cal. App. 4th 1670, 1682 (1994) (finding that the City's choice to drill water wells as a way to conserve water was not an emergency under CEQA because it constituted a choice among many that the City made over a considerable period of time).

^{xxii} California Public Resources Code §30811.

^{xxiii} California Public Resources Code §30320 Findings and declarations.

^{xxiv} Staff Report prepared by Catalina Hernandez, paragraph I.(C.) Project Costs on Page 2.

^{xxv} LADWP Application for Coastal Development Permit Section II.(3) on Page 4.

^{xxvi} Staff Report prepared by Catalina Hernandez, Page 7.

^{xxvii} Ibid., Page 1.

^{xxviii} Ibid., Page 1 states "LADWP installed a temporary Pole-Top Distribution Station" and also "As a temporary measure"; the Application, Page 1, Section 2 states "LADWP proposes to install temporary Pole-Top Distribution Station"

^{xxix} California Public Resources Code §30253 - Minimization of adverse impacts.

^{xxx} Pacific Palisades Community Council Information dated March 19, 2016. Listing both empty lots on Sunset as alternatives. In addition, it listed the corner of Las Lomas/Sunset and Las Liones/Sunset (so. of Sunset) and corner of Las Lomas/Sunset and Las Casas/Sunset (so. of Sunset) as additional alternatives.

^{xxxi} LADWP press release dated May 1, 2016.

^{xxxii} The alternatives identified were: "two were near Paseo Miramar off Via Nichols, one was between the upper Bel-Air Bay Club and Malibu Village and the fourth was the old Bernheimer Gardens site off of Sunset."

^{xxxiii} California Public Resources Code §30250 Location; existing developed area.

^{xxxiv} LADWP press release date February 9, 2016, Page 2.

^{xxxv} Ibid. The General Plans states that "Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway."

^{xxxvi} California Public Resources Code §30251 - Scenic and visual qualities.

EXHIBIT I

BOARD OF PUBLIC WORKS
MEMBERS

KEVIN JAMES
PRESIDENT

HEATHER MARIE
REPPENING
VICE PRESIDENT

MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

LUZ M. RIVAS
COMMISSIONER

FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

Issuance Date: March 9, 2017
Coastal Development Permit Number: 16-14

NOTICE OF PERMIT ISSUANCE

Please take notice that the above referenced local Coastal Development Permit was issued on the above date, pursuant to a public hearing held on November 9, 2016, a Notice of Decision on December 5, 2016, and following the expiration of the mandatory ten calendar day appeal period with one appeal having been filed, and denial of the appeal by the Board of Public Works Commissioners on March 8, 2017.

The applicant should sign one (1) copy of the permit and return it to the:


Bureau of Engineering
Environmental Management Group
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

This permit becomes effective 20 working days from the date this notice is received by the Coastal Commission, if no further appeal is made. Appeals can be made to: California Coastal Commission, South Coast District Office, 200 Oceangate, 10th Floor, Long Beach, CA 90802, (562) 590-5071.

- ☒ [X] The development is subject to dual jurisdiction and will require an additional permit from the California Coastal Commission.
- ☐ [] The development is not in the dual jurisdiction area; no additional Coastal Development Permit is required

Sincerely,

Gary Lee Moore, P.E., ENV SP
City Engineer


By: Maria Martin, Manager
Environmental Management Group

MM/CH/CDP 16-14 Notice of Permit Issuance.doc
Enclosure: Coastal Development Permit
Cc: California Coastal Commission with copy of file



**BOARD OF PUBLIC WORKS
MEMBERS**

KEVIN JAMES
PRESIDENT

HEATHER MARIE REPENNING
VICE PRESIDENT

MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

LUZ M. RIVAS
COMMISSIONER

FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

COASTAL DEVELOPMENT PERMIT

(Under authority of Sec. 30600(b) of the California Coastal Act of 1976)

PROJECT TYPE: (X) Public () Private

APPLICATION NUMBER: 16-14

NAME OF APPLICANT: Los Angeles Department of Water and Power (LADWP)
111 North Hope Street, Room #856
Los Angeles, CA 90012

PROJECT LOCATION: The project is located in the public right-of-way parallel with Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place, within the Brentwood-Pacific Palisades Community Plan

DEVELOPMENT DESCRIPTION: The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26 feet x 7 feet 5 inches, three 833-KVA transformers measuring 6 feet 9 inches tall x 4 feet 7 inches wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The underground substructure will be connected to the PTDS via underground cable terminations. The underground substructure work consists of approximately 1,000 feet of trench for conduit installation with a 9 feet 4 inches x 17 feet 4 inches substructure near the PTDS. The trench will be from two existing substructures on Marquez and Sunset to the new substructure and the PTDS. The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational.

All applicable regulations will be incorporated into and adhered to per standard procedures.

I. The proposed development is subject to the following conditions imposed pursuant to the California Coastal Act of 1976:

- (a) 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 City Engineer's office.

- (b) **Interpretation:** Any questions of intent or interpretation of any condition will be resolved by the City Engineer.
 - (c) **Assignment:** The permit may be assigned to any qualified person, provided assignee files with the City Engineer an affidavit accepting all terms and conditions of the permit.
 - (d) **Terms and Conditions Run with the Land:** These terms and conditions shall be perpetual, and it is the intention of the City Engineer and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.
 - (e) **Other approvals:** Obtain permit from the State Coastal Commission if project is determined to be a Major Public Works per §13012 of the California Code of Regulations.
- II. The following are conditions of approval for the LADWP Temp Pole Top Distribution Station – Sunset Blvd. @ Marquez Ave. (W.O. UR400725):

(a) Special Conditions of Approval

1. **Monitor.** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards shall be present to monitor all ground-disturbing activities.
2. **Awareness Training.** Prior to initiation of ground-disturbing activities for the underground portions of the project, the archaeological monitor will conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training would explain the importance of and legal basis for the protection of significant archaeological resources. Each worker would also learn the proper procedures to follow in the event that cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor and the archaeological monitor. It is recommended that this worker education session include visual images of artifacts that might be found in the project vicinity, and that the session take place on-site immediately prior to the start of ground-disturbing activities.
3. **Inadvertent Discovery.** In the event that archaeological resources are exposed during construction, work in the immediate vicinity of the find must stop until a qualified archaeologist can evaluate the significance of the find and make applicable recommendations to avoid significant impacts to archaeological resources. Construction activities may continue in other areas. If the discovery proves

significant under CEQA, additional work such as testing or data recovery may be warranted.

4. Procedure for Human Remains. In accordance with CEQA Guidelines section 15064.5(e), in the event of the accidental discovery or recognition of any human remains during construction, the following steps shall be taken:

(1) There shall be no further excavation or disturbance of the site of the human remains or any nearby area reasonably suspected to overlie adjacent human remains until:

A. The Los Angeles County Coroner must be contacted to determine that no investigation of the cause of death is required, and

B. If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.

2. The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.

3. The most likely descendent (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. The MLD shall complete its inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site, or

(2) Where the following conditions occur, LADWP or its authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity in a location not subject to further subsurface disturbance.

A. The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the NAHC.

B. The MLD identified fails to make a recommendation; or

C. LADWP or its authorized representative rejects the recommendations of the MLD, and the mediation by the NAHC fails to provide measures acceptable to LADWP.

5. Written Report. A written report detailing monitoring activities and recommendations

for further treatment of archaeological discoveries shall be provided to the City upon completion of the monitoring work. The report shall comply with the requirements and recommendations of the California Office of Historic Preservation. A draft copy shall be submitted to the City for review within 30 days of monitoring completion. A final report shall be submitted to the City in hard copy and electronic format (Adobe PDF acceptable) no later than one week after receipt of comments on the draft report from the City. A hard copy of the report shall also be submitted to the South Central Coastal Information Center within forty-five (45) days of final submittal to the City.

III. FINDINGS: In keeping with the findings and recommendations set forth in the adopted staff report incorporated herein by reference, the City of Los Angeles finds that:

- (a) The development is in conformity with Chapter 3 of the California Coastal Act of 1976, and will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program in conformity with said Chapter 3.
- (b) The Interpretative Guidelines established by the Coastal Commission dated August 14, 1978 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making this determination, and the decision of the permit granting authority has been guided by any applicable decision of the Coastal Commission.
- (c) If the development is located between the nearest public road and the sea of shoreline of any body of water located within the Coastal Zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the Coastal Act.
- (d) Pursuant to the California Environmental Quality Act (CEQA), the LADWP found the project to be exempt from CEQA review and filed a Notice of Exemption on May 26, 2016.

Staff reviewed and considered the Notice of Exemption and determined there are no additional evaluations required by the California Environmental Quality Act in connection with the approval of this permit.

- IV. Pursuant to a public hearing held on November 9, 2016, a Notice of Decision on December 5, 2016, and following the expiration of the mandatory ten calendar day appeal period with one appeal having been filed, and denial of the appeal by the Board of Public Works Commissioners on March 8, 2017.
- V. This permit may not be assigned to another person except as provided in Section 13170, Coastal Commission Rules and Regulations.



- VI. This permit shall not become effective until the expiration of 20 working days after a COPY of this permit has been received by the State Coastal Commission, upon which copy all permittees or agent(s) authorized in the permit application have acknowledged that they have received a copy of the permit and have accepted its contents, unless a valid appeal is filed within that time. The acknowledgement should be returned within ten (10) working days following issuance of the permit but in any case prior to commencement of construction. If the acknowledgement has not been returned within the time for commencement of construction under Section 13156(g), the executive director shall not accept any application for the extension of the permit.
- VII. Work authorized by this permit must commence within two years from the effective date of this permit. Any extension of time of said commencement date must be applied for prior to expiration of the permit.
- VIII. Issued: March 9, 2016 pursuant to local government authority as provided in Chapter 7 of the California Coastal Act of 1976.
- XIV. I, _____, permittee/agent, hereby acknowledge receipt of permit number 16-13 and have accepted its content.

Signature

Date



EXHIBIT II

City of Los Angeles
APPEAL
From Coastal Development Permit Action

CDP Application No.: 16-14

Council District: 11

TYPE OF ACTION BEING APPEALED: ☒ Appeal from Permit Action
☐ Appeal from Revocation of Permit

DATE OF ACTION BEING APPEALED: December 5, 2016

DEVELOPMENT DESCRIPTION: Los Angeles Department of Water and Power,
Temporary Pole Top Distribution Station (3-833 KVA Transformers) as Sunset Blvd.
and Marquez Ave., Pacific Palisades, California. (W.O. UR4000725)

COMMUNITY PLAN: Brentwood-Pacific Palisades, West Los Angeles District.

Land Use Indicated: Public Utility Installation and Distribution Station

TO BE COMPLETED BY APPELLANT - PLEASE TYPE OR PRINT

DEVELOPMENT ADDRESS: 16970 West Sunset Blvd.

City, Zip: Pacific Palisades, CA 90272

Between: Sunset Blvd. and Marquez Ave.

APPLICANT'S NAME: Los Angeles Dept of Water and Power; Phone 800-342-5397

Address: P.O. Box 51111

City, Zip: Los Angeles, CA 90051-0100

APPELLANT'S NAME: 16974 Sunset Blvd., LLC Phone: 310-458-5959

C/O Costell & Cornelius Law Corporation

Attn: Alexandre Ian Cornelius/Lewis Adelson

Address: 1299 Ocean Ave., Suite 450

City, Zip: Santa Monica, CA 90401

acornelius@costell-law.com

NOTICE: All items in this Notice of Appeal must be completely filled out before it can be received and certified by the Clerk. An owner or lessee of the property involved is required to pay an appeal fee equal to one-half of the filing fee for the application.

This is to certify that the application has been inspected by me and has been found to be thorough and complete in every particular.

City of Los Angeles
APPEAL
From Coastal Development Permit Action

I. GROUNDS FOR APPEAL

State fully the specific grounds for this appeal (state if your appeal is from the entire decision or determination, or from elements of the determination, such as some of the conditions imposed; state in detail those elements which you desire to appeal; submit facts and information in support of this appeal)*:

See the attached

II. STATEMENT OF FACT

Give a complete statement of the facts upon which the appeal is based*:

See the attached

III. SUMMARY OF ISSUES

Provide a concise summary of the substantial issues(s) raised by the appeal*:

See the attached.

*Note: Use attachments to continue if necessary. Clearly label the continuation as to which question it pertains.

IV. REQUIRED ATTACHMENTS

A. A list of all other persons known by the appellant to have an interest in the matter appealed. See the attached.

V. INSTRUCTIONS FOR FILING NOTICE OF APPEAL


A. Notice in writing of the appeal of projects must be received by the **Bureau of Engineering, 1149 S. Broadway, Suite 600, Los Angeles** by 5:00 p.m. on or before the 10th calendar day following the decision being appealed. Such written notice may be either by: (a) delivery of this completed Notice of Appeal, or (b) by other communication *in writing*, such as a telegram, stating the name, address and telephone number of the applicant and appellant, the date and nature of the decision being appealed, the Coastal Development case number and identification of the proposed development.

B. When the appellant utilizes procedure 1(b) above, he or she must follow-up by transmitting a completed Notice of appeal within five calendar days of initial filing of the appeal.

City of Los Angeles
APPEAL
From Coastal Development Permit Action

APPELLANT'S SIGNATURE

Signed: _____



Alexandre Ian Cornelius
Lewis Adelson
Costell & Cornelius Law Corporation
1299 Ocean Ave., Suite 450
Santa Monica, CA 90401
Ph: 310-458-5959
acornelius@costell-law.com
Authorized Representative and
Attorney-In-Fact for 16974 Sunset Blvd., LLC

Date: December 15, 2016

**ATTACHEMENT TO APPEAL OF
16974 SUNSET LLC TO
COASTAL DEVELOPMENT PERMIT 16-14**

December 15, 2016

**Re: APPEAL FROM APPROVAL OF COASTAL DEVELOPMENT
PERMIT APPLICATION NO. 16-14
Proposed installation by LADWP of Temporary Pole Top Distribution
Station Sunset Blvd. at Marquez Ave.**

City of Los Angeles Bureau of Engineering:

This attachment is submitted in furtherance of the appeal of 16974 Sunset Blvd, LLC ("**Objecting Party**") to the Notice of Decision dated December 5, 2016 (the "**Decision**") that approved Coastal Development Permit Application Number 16-14 (the "**Application**") of the Los Angeles Department of Water and Power ("**LADWP**") for a Temporary Pole Top Distribution Station ("**PTDS**") located near the intersection of Sunset Boulevard and Marquez Avenue in Pacific Palisades, California. The Decision is attached hereto as Exhibit "A." Objecting Party filed an Objection to the Application and appeared at the hearing on the Application on November 9, 2016 (the "**Objection**"). The Objection is attached hereto as Exhibit "B" and the Application is attached to the Objection as Exhibit "1" and both are and incorporated herein by this reference.

**I. AND II. GROUNDS FOR THE APPEAL AND FACTS SUPPORTING
THE SAME.**

The Objecting Party appeals from the entire decision set forth in the Decision. The Decision states that the project proposed under the Application, the PTDS, "is found to be in conformity with Chapter 3 of the California Coastal Act." There is no support for this conclusion or finding and the Final Staff Report issued on December 5, 2016 (the "**Staff Report**"), lacks material support for its findings and conclusions and cannot be relied upon as basis to approve the Application or for the issuance of a permit for the PTDS. The Final Staff Report is attached hereto as Exhibit "C" and incorporated herein by this reference.

As summarized in Section III, below, there are substantial issues that warrant granting this appeal and reversing the Decision to approve the Application. The Decision should be reversed and the Application should be denied for the reasons set forth herein and/or modified as proposed herein including, but not limited to, to require compliance with the California Coastal

Act, California Resources Code §§ 30000, et seq. (the "Act"), the Los Angeles General Plan (the "General Plan") and the Brentwood-Pacific Palisades Community Plan (the "Community Plan") by situating the PTDS underground or installing a padmounted transformer and setting a deadline for the removal of the temporary power installation. On this point, the LADWP and the City both state that the PTDS is temporary yet the Staff Report and the Decision do not set forth a deadline as to when the temporary PTDS must be removed and do not define what "temporary" means. As a temporary installation, the conditions for approval of the PTDS must include a deadline for the removal of the same.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26' x 7'5", three 8333-KVA transformers measuring 6'9" tall and 4'7" wide, cross arms, circuit breakers, switches, and a controller.

The Objecting Party is an "Aggrieved Person" under the Act.ⁱ A number of community members are also opposed to the PTDS. The Facebook Page for the Pacific Palisades Residence Association with a post opposed to the PTDS shows 900 likes, 48 shares and 6 comments; a Change.Org petition opposing the PTDS has 240 signatures; and the Save the Palisades Bluffs Facebook post shows 192 likes, 27 shares and 18 comments. The screenshots of the Facebook Posts and the Change.Org petition are collectively attached to the Objection, Exhibit "B" as Exhibit "4" thereto.

The Objecting Party has reviewed the Decision, Application and Staff Report and it is familiar with the site of the PTDS as it is adjacent to the residential development site located at 16974 West Sunset Boulevard, Pacific Palisades, California (the "Property").ⁱⁱ Since the PTDS and the Property are located within the coastal zone, as confirmed by the City's ZIMAS zoning information system, it is protected by the Act.ⁱⁱⁱ Under § 30003 of the Act - Compliance by Public Agencies, both the City and the LADWP are required to comply with the Act:

All public agencies and all federal agencies, to the extent possible under federal law or regulations or the United States Constitution, shall comply with the provisions of this division."

Thus the City, LADWP and the Bureau of Engineering (the "Bureau") are required to comply with all the provisions of the Act.^{iv}

A. THE DECISION TO APPROVE THE PERMIT APPLICATION DID NOT ADEQUATELY ADDRESS THE PUBLIC COMMENTS AND ISSUES RAISED AT THE HEARING ON THE APPLICATION AND THE OBJECTIONS TO THE SAME.

I. The PTDS is Already In Violation of the Act and Must Be Removed.

Contrary to Section III., A., 1, of the Staff Report, the unpermitted work at the site for the PTDS violated the Act and is a substantial issue and grounds in and of itself to grant the appeal. Construction of the PTDS began on or about July 6, 2016 *without* a permit complying with the Act and with knowledge by LADWP that the work required a permit since it was a development as defined under the Act. Section 30106 of the Act – Development, defines ‘Development’ to mean “on land, in or under water, the placement or erection of any solid material or structure ..., *including any facility of any private, public, or municipal utility*;...

As used in this section, "structure" includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line." (emphasis added.)

Development includes, but is not limited to, the construction of any structure such as an electrical power transmission and distribution line.^v The installation of a PTDS constitutes "development" as defined in the Act thus triggering the requirement of a coastal development permit *prior* to the commencement of any development or installation of any PTDS structures.

Prior to having a coastal development permit issued (or any kind of permit), LADWP vehicles trespassed onto the Property and Objecting Party's representatives demanded that the LADWP personnel leave the Property immediately, which the LADWP refused. Thereafter, a significant portion of the installation of the PTDS continued without a permit in violation of the Act and only now, after-the-fact, did the LADWP attempt to comply with the Act by filing the Application. In a shocking admission as to how improper the LADWP's conduct was, Section VI, 1. - Standard Conditions of Approval of the Staff Report, states that the "development shall not commence until a copy of the permit is signed."^{vi} (emphasis added.) Moreover, the Staff Report requires at Section VI, 6. - Standard Conditions of Approval, that before construction the LADWP, "[o]btain a permit from the State Coastal Commission."^{vii} Yet, the LADWP commenced construction of the PTDS without a permit from either the City or the Coastal Commission, in violation of its own staff report and the Act.

The work performed by LADWP, including the actual installation of three (3) 61' metal poles for the PTDS and a fourth pole of about 30', was done in an effort to "ram" the project through in violation of the Act. The LADWP is

forcing the PTDS on the Community as a "done-deal", a fate-acompli', which the LADWP insists the Community must accept without question because money has already been spent and construction started. This approach by the LADWP is heavy handed, improper, a violation of the Act and the General and Community Plans and a complete trampling of the community's and property owners' rights to have a say in "development" within the Coastal Zone. The LADWP is trying to "boot-strap" itself into approval of the Application by violating the law and starting the work and spending rate payer and tax payer money without a valid permit from the City or the Coastal Commission. Had LADWP actually followed the correct process (which they have admitted they did not because they are now seeking a coastal permit that they should have applied for in the first place), the public would have been given a real opportunity to give meaningful input and potentially change the location or an alternative at grade pad-mounted or underground development solution could have been pursued. If a private citizen had proceeded to construct 61' structures in the Coastal Zone without a coastal development permit such construction would be red tagged and ordered to be removed. The LADWP is subject to the same provisions of the Act. This "act first and seek permission later" approach of the LADWP is reason enough to grant this appeal and deny the Application and order removal of the PTDS.

Pursuant to Section 30600 of the Act - Coastal Development Permit; Procedures Prior to Certification of Local Coastal Program:

Except as provided in subdivision (e), and in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person, as defined in Section 21066, wishing to perform or undertake any development in the coastal zone, other than a facility subject to Section 25500, shall obtain a coastal development permit."

The Property and the site of the PTDS "is located within the California Coastal Zone and is considered 'single coastal jurisdiction' (i.e. the Coastal Zone of the City of Los Angeles alone)", as defined by the Act, and the draft staff report confirms the same.^{viii} The City and the LADWP were required prior to construction of the PTDS to comply with the § 30600 of the Act.^{ix} This failure is a substantial issue and grounds in and of itself to grant the appeal and deny the Application.

2. The PTDS Violates the Act Due to Visual Blight and Safety.

Contrary to Section III., A., 3, of the Staff Report, the PTDS violates the Act and this is a substantial issue warranting the granting of this appeal. Pacific Palisades is a small scenic community where development proposals should be considered very carefully. The Property and the proposed site for the

PTDS are located in a very sensitive area off Sunset Boulevard which is designated as a scenic highway by the City of Los Angeles.^x The installation of the PTDS will create a visual blight, contrary to the claims in the Staff Report. The poles are in excess of 60,' and are effectively an industrial development negatively impacting the views along Sunset Boulevard and the properties that face along Sunset Boulevard as well as the Property. The poles are out of place and are wholly incompatible with the surrounding residential development. Pictures showing the negative impact of the poles that have been installed at the site of the PTDS are attached to the Objection, Exhibit "B", as Exhibit "5" thereto. It must be further noted that the currently installed poles do not yet include one of the most aesthetically impactful parts of the installation – the suspended transformers. The transformers are extremely incompatible, as they are not similar in any way to a typical wooden power pole. Scenic features include views of the estates, which are negatively impacted by the PTDS. Section 30251 of the Act - Scenic and Visual Qualities of the Coastal Act, provides:

"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."^{xi} (emphasis added.)

Thus, the scenic and visual qualities of coastal areas are to be considered and protected as a resource of public importance. Permitted development, including development like the PTDS, shall be sited and designed to protect views along the scenic coastal areas. In order to implement this, both the Community Plan and the General Plan require that electrical and utility installations be installed underground. Sunset Boulevard is heavily traveled by many tourists and there are a number of residences that face Sunset Boulevard that will have their residential views marred and interfered with by the PTDS. Moreover, the painting of the PTDS as discussed in the Staff Report will do absolutely nothing to mitigate the negative impact of the three (3) 61' poles and three (3) transformers of 6.9' x 4.5' suspended about 30' in the air.^{xii} The proposal that paint could somehow mitigate the negative impact of the PTDS is simply not credible giving the visual evidence of the pictures attached as Exhibit "5" to Exhibit "B." The significant, negative visual impact is a substantial issue warranting the granting of this appeal.

The Staff Report did not even address the issue that safety is also a major concern since Sunset Boulevard is a major thoroughfare with a 35 mile per hour speed limit and with an extremely large number of curves. The incident in Arleta, California on February 18, 2016, where a driver was killed when he crashed into a PTDS and the transforms fell on his vehicle, is a real possibility for the present location of the PTDS given the traffic count and volume on Sunset Boulevard and that fact that the PTDS is being situated in the public right of way less than ten feet from the road. The PTDS is unmonitored and contains oil which could leak onto the sidewalk or street. Finally, other areas in the Palisades Community have objected to the PTDS on the basis of concerns about the impact of electromagnetic radiation or fields ("EMF") created by the transforms and all of those same concerns apply to the site selected for the PTDS as the Property will be developed into single family homes and there currently is an apartment building with children and families located adjacent to the PTDS site. On this issue, both an underground or at grade installation would reduce the impact of any EMF concerns as recognized in the 2002 report for the IEEE Rural Electrical Power Conference in Colorado Spring, May 2002 attached as Exhibit "6" to the Objection, Exhibit "B" (entirely pad mounted installations of distribution stations have less EMF issues than pole mounted installations). These are substantial issues with the Staff Report completely neglects to address.

Since permitted development must be sited and designed to protect views to and along scenic coastal areas, the PTDS should be visually compatible with the character of surrounding areas and should be installed in another location or underground (as required by the General and Community Plans). Moreover, safety concerns have not been addressed by the LADWP or by the Staff Report and the PTDS as proposed is a hazard to the community. The appeal should be granted and the permit for the Application denied and the PTDS relocated or in the alternative constructed underground or padmounted and appropriately landscaped in order to mitigate its negative, industrial visual blight and to reduce the potential hazardous impacts of the PTDS. These are substantial issues that warrant granting the appeal and reversal of the Decision.

3. The PTDS Violates the Los Angeles General Plan and the Brentwood-Pacific Palisades General Community Plan.

Contrary to Section III., A., 4, the PTDS violates the General and the Community Plans and this is a substantial issue that requires granting the appeal and reversing the Decision. The General Plan states: "*To the maximum extent feasible, all new or relocated electric . . . utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground.*" ^{xiii} (emphasis added.) Since the PTDS is within 500 feet of the centerline of a Scenic Highway, Sunset Boulevard, the General Plan for the City requires that the project be built underground. Although the LADWP has stated that locating the distribution station underground is not an option due to the

size, complexity, and risk of water intrusion, as set forth below, the electrical construction consultants of the Objecting Party have indicated that a distribution station can be safely built underground (or at grade and pad mounted).

LADWP has not adequately explored the feasibility of an underground solution and it cannot violate the General and Community Plans which require that any new distribution station within five hundred feet of the center line of Sunset Boulevard be built underground or that all new electrical distribution stations be built underground in the Brentwood-Pacific Palisades area. There are no reports or analysis, cost estimates or feasibility analysis to support LADWP's position. Instead, there are simply conclusory statements which show that the LADWP and the Staff Report never even really considered the underground alternative and did not price the same. LADWP must be required to prove, without a shadow of a doubt, that undergrounding is unequivocally infeasible in order to even consider a PTDS along the Scenic Highway, but this has simply not been completed or shared with the public. The appeal should be granted because the LADWP and the Staff Report are devoid of any evidence that these alternatives were analyzed "to the maximum extent feasible" as required by the General Plan and this is a substantial issue warranting reversal of the Decision.

Another substantial issue warranting the granting of the appeal is that the PTDS development violates the Community Plan at Page IV-3 which provides, "UTILITIES 1. Install utilities underground through assessment districts or other funding, when feasible."^{xiv}

LADWP and the Staff Report claim that the PTDS cannot be situated underground or padmounted but the Objecting Party has engaged a consultant, Integrated Environmental Technologies and they have prepared a schematic for an alternative padmounted solution with pricing and performance specifications similar to the equipment to be installed at the PTDS and the cost for the equipment is only about \$39,000.00. The schematic for the padmounted distribution station, the invoices and the summary report of the consultants is attached as Exhibit "7" to the Objection, Exhibit "B" hereto. The consultants have indicated that an underground or padmounted distribution station is completely feasible but that the LADWP has not, in the Application meaningfully analyzed or considered the same, nor does the Staff Report. Also the consultants estimate that the labor cost for a padmounted solution is approximately \$100,000.00 (without taking into account the LADWP's mandated labor policies which could increase the price). Thus, in accordance with the requirements of the General Plan there is a feasible method to install the substation underground or at a minimum as a padmounted distribution station which would address many of the concerns of the Community. The Staff Report contains no evidence as to what the LADWP thinks a padmounted or underground solution will cost and this creates a substantial issue warranting the granting of the appeal as to whether the LADWP "to the maximum extent feasible" analyzed the underground or pad mounted alternatives. In addition,

the alleged water intrusion issues cited by the LADWP can be addressed with a double wall structure as described and built in Zurich, Switzerland and discussed in the materials provided by Poyray-Electrical Works of Zurich Oerlikon Substation per the report attached as Exhibit "8" to the Objection, Exhibit "B" hereto. The LADWP has not even explained why they believe that there are groundwater or water intrusion issues at the site and the Staff Report contains no evidence or analysis with respect to the same. Frankly, the proposed site is over 100' above sea level and there is no evidence or support for any finding in the Application of Staff Report that there is, in fact, a groundwater or water intrusion condition at the site. Again the statements in the Application and Staff Report as to water issue are conclusory and speculation without any type of analysis and certainly do not meet the "maximum extent feasible" requirement under the General Plan to site electrical distribution stations underground. Thus, there is a substantial issue that the LADWP has not followed the Community Plan and the General Plan to install the distribution station underground or even conducted the required "to the maximum extent feasible" analysis and this warrants granting the appeal and reversing the Decision for failure to comply with the Community and General Plans.

The PTDS development violates Pages 1-2 and 3 of the Community Plan^{xv} which provides the following residential issues:

- Need to protect environmentally sensitive areas, scenic views and scenic corridors.
- Need to improve the visual environment through the development of appropriate design criteria and controls.^{xvi}

The need to protect environmentally sensitive areas and scenic corridors has been violated by the PTDS since it creates a visual blight and is, effectively, an industrial development in a residential area. Also the need to improve the visual environment through the development of appropriate design criteria and controls has been violated since the appropriate design criteria is an underground installation of the PTDS as dictated by the Community and General Plans. The Staff Report contains no findings and contains no evidence that would refute the conclusion that the PTDS interferes with scenic corridors.

The PTDS development violates the Plan at Page 111-7 which provides:

"1-6.6 The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.

* * *

Program: Condition new development to protect views from public roadways and parklands.”^{xvii}

The PTDS development violates the condition that new developments protect views from public roadways, since the PTDS is located adjacent to Sunset Boulevard and does not protect the views from a public roadway and creates a negative visual impairment of the scenic views of the residential coastal neighborhood surrounding Sunset Boulevard. Therefore, since installation of the distribution station can be constructed underground as described above, the PTDS violates the General and Community and Plans and the Act that require that development be integrated with and be visually subordinate to natural features and terrain. The Staff Report contains findings and contains no evidence that would refute the conclusion that the PTDS does not protect the views.

Development of the PTDS also violates sections of the Community Plan on Pages III-15 and 16 which provides:

“COASTAL RESOURCES Development in the Coastal Zone is subject to the provisions of the California Coastal Act. As of 1997, the City had not prepared a local coastal plan (LUP/LCP) for the Pacific Palisades Coastal areas.”

Since the Community Plan incorporates the provisions of the Act, all violations under the Act are also violations of the Community Plan. As described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. Thus, LADWP also violated this section of the Community Plan and the Staff Report does not address this issue. On this basis there is a substantial issue and the appeal should be granted.

Goal 5 of the Community Plan entitled “PRESERVATION OF THE SCENIC AND VISUAL QUALITY OF COASTAL AREAS,” provides for the following objectives, policies, and programs which have been violated by the PTDS development:

“Objective 5-1 To govern the manner in which the City of Los Angeles implements the California Coastal Act of 1976, as well as the establishment of land uses and their subsequent development.

Policies 5-I.1 The location and amount of new development should maintain and enhance public access to the coast.

Program: Permitted development shall be designed to protect views to 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 the visually degraded areas.

Program: Coastal Development Permits are required for new development which establish conditions for new development.

The PTDS development violates the objective of the Community Plan of implementing the provisions and requirements of the Act since, as described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. The PTDS development also violates the objective of the Community Plan regarding protecting scenic coastal areas by building the distribution station above ground on 61' poles creating visual blight and placing an industrial development in a residential area. The PTDS development further violates the objective of the Community Plan by not being visually compatible with the character of surrounding areas by building the PTDS above ground on poles creating negative visual impacts and interfering with scenic coastal areas instead of constructing the distribution station underground. The PTDS as approved also violates the objective of the Community Plan by not obtaining a coastal development permit for a public works projects and by not analyzing or setting forth any findings that the PTDS is consistent with the Community Plan.

The Staff Report claims without any basis in fact whatsoever that "[t]he majority of the project is underground, as stated at the public hearing, and will be screened to reduce visibility." This statement/finding is neither supported by anything in the record nor by reality. The PTDS is not underground, it's very name "Pole Top" denotes that it is above ground. A simple review of the pictures of the PTDS installation attached as Exhibit "5" to the Objection, Exhibit "B" hereto, confirms that the whole PTDS is above ground (there may be some concrete footing for the poles and underground conduits or wires but the actual transformers are above ground on poles. The PTDS consists of three 61' metal poles, a 30' metal pole, a large metal rack that is 26' x 7'5" and three very large and bulky transformers that are 6'9" x 4'7"). Thus, the actual transformers and poles that hold the items that create the most visual blight are all above ground and visible from Sunset Blvd and the surrounding land owners. Moreover, as to screening, all the LADWP proposes to do is to paint the poles for "screening." Painting is not screening and no amount of paint can minimize the visual effects of the PTDS.

Since the LADWP failed to follow several sections and requirements of the Community and General Plans and the Staff Report contains no evidence to support its findings on these matters, this creates a substantial issue that

warrants the reversal of the Decision approving the Application and the LAWDP should be ordered to comply with the General Plan and the Community Plan.

4. The LAWP has Not Complied with CEQA and Compliance is a Requirement of a Permit for the PTDS.

Contrary to Section III., A., 5, of the Staff Report, the PTDS violates the California Environmental Quality Act ("CEQA")^{xviii} which is a statewide policy of environmental protection. CEQA does not directly regulate land uses, but instead requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and adopt all feasible measures to mitigate those impacts. CEQA makes environmental protection a mandatory part of every California state and local agency's decision-making process. The Staff Report without any analysis or without commenting upon the analysis offered by the Objecting Party claims that the Application complies with CEQA. This is not true and there is no evidence to support this finding and this creates a substantial issue warranting reversal of the Decision.

A notice of exemption ("NOE"), attached as Exhibit "9" to the Objection, Exhibit "B" hereto, was filed by LADWP on May 25, 2016. The exemption was based upon two grounds: 1) as an electrical and other utility extension, and 2) as an emergency project. The first ground cited is that the project is subject to a Class 3 categorical exemption for "electrical . . . and other utility extensions".^{xix} However, a PTDS is plainly not an electrical or utility "extension," but rather a new facility and therefore not exempt. The second ground cited is that the project qualifies for a statutory exemption as an emergency project. There has been no evidence that would suggest that placing a PTDS adjacent to the Property was necessary to prevent or mitigate an "emergency."

"Emergency," as defined by CEQA, means a "sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. 'Emergency' includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage."^{xx} Under case law, the definition of an emergency is limited to an occurrence and not a condition, meaning that the occurrence must involve a clear and imminent danger, demanding immediate action.^{xxi} The decision to place the PTDS in front of the Property was the result of years-long, prolonged process in response to consistent outages in the Pacific Palisades. In fact, in 2012, LADWP first considered constructing a power distribution station on its property near Marquez Charter School, on Marquez Avenue. The decision to place the PTDS adjacent to the Property was not an action taken in response to a sudden or unexpected occurrence necessary to prevent or mitigate an emergency power outage in the Pacific Palisades but, rather, was a decision reached over an extended period of time in response to a known condition. The Staff Report does not even address or comment on these issues whatsoever and

the failure of the Staff Report to address these issues as the impropriety of the NOE and its invalidity creates a substantial issue that warrants the reversal of the Decision.

The NOE is invalid because the LADWP was required to comply with all CEQA procedures in order to, among other things, identify the significant environmental impacts of the PTDS on the community, and to avoid or mitigate those impacts. As such the appeal should be granted due to the failure of the LADWP to comply with CEQA and failure of the Staff Report to address or analyze the invalidity of the NOE.

5. The City and its Departments and Divisions Have a Conflict of Interest in Ruling on the Application or this Appeal.

Contrary to Section 111., A., 2, of the Staff Report, the unpermitted work at the site for the PTDS creates a conflict of interest for the City, the LADWP and the Bureau and is a substantial issue warranting granting of the appeal. The LADWP claims it has already spent \$250,000.00 (for which there is no back up or support) on installing the PTDS. However, the City (of which the LADWP is a division/agency) and the Bureau are not only filed the Application seeking the permit but at the same time conducted the hearing on the Application and decided to approve the permit and are now conducting the appeal of the Decision to issue the permit. As such, the City has a conflict of interest and was highly motivated to approve the Application despite it violating the Act, the General Plan, the Community Plan and CEQA. If the City does not approve the Application, then one of its agencies - the LADWP - could be accused of misuse of public rate payer funds because the LADWP commenced work on the PTDS without first obtaining a permit from the City and a coastal development permit from the Coastal Commission. This issue could cloud the City's and this Bureau's judgment and raises the specter of the City having a conflict of interest in hearing and ruling on the Application and this appeal or, at a minimum, gives the appearance of a conflict of interest. Under these circumstances, the Bureau should grant the appeal reverse the approval of the Application and deny the permit outright.

The Coastal Act Section 30811 - Restoration Order; Violations, provides:

"In addition to any other authority to order restoration, the commission, a local government that is implementing a certified local coastal program, or a port governing body that is implementing a certified port master plan may, after a public hearing, order restoration of a site if it finds that the development has occurred without a coastal development permit from the commission, local government, or port governing body, the development is inconsistent with this division, and the development is causing continuing resource

damage.”^{xxii} The Coastal Act empowers local governments to address permit violations by issuing an order of restoration of a site if it finds that the development has occurred without a coastal development permit.

Since the LADWP failed to follow the law to which the public is required to adhere, and brazenly moved forward with the development of the PTDS without a permit from the City and a permit from the Coastal Commission, the appeal should be granted and the approval of the permit Application should be reversed and the LADWP should be required to remove the current illegally installed PTDS and restore the Property to its original condition until the permit process is exhausted, and until (if and when) final permits are issued to the LADWP for the legal installation of the PTDS.

6. The LADWP Has Violated Due Process.

Contrary to Section III., A., 6, of the Staff Report, the LADWP violated the Act and state and federal constitutional due process by failing to give sufficient notice and by failing to make materials and accurate information related to the Application available to the public in a timely manner and by holding the hearing on the minimum notice after the LADWP had already constructed a significant portion of the PTDS without the proper permit. Pursuant to Section 30320 of the Act - Findings and Declarations:

“(a) The people of California find and declare that the duties, responsibilities, and quasi-judicial actions of the commission are sensitive and extremely important for the well-being of current and future generations and that the public interest and principles of fundamental fairness and due process of law require that the commission conduct its affairs in an open, objective, and impartial manner free of undue influence and the abuse of power and authority. It is further found that, to be effective, California's coastal protection program requires public awareness, understanding, support, participation, and confidence in the commission and its practices and procedures. Accordingly, this article is necessary to preserve the public's welfare and the integrity of, and to maintain the public's trust in, the commission and the implementation of this division. (b) The people of California further find that in a democracy, due process, fairness, and the responsible exercise of authority are all essential elements of good government which require that the public's business be conducted in public meetings, with limited exceptions for sensitive personnel matters and litigation, and on

the official record. Reasonable restrictions are necessary and proper to prevent future abuses and misuse of governmental power so long as all members of the public are given adequate opportunities to present their views and opinions to the commission through written or oral communications on the official record either before or during the public hearing on any matter before the commission."^{xxiii}

The Act imposes duties, responsibilities, and quasi-judicial actions on local governments issuing development permits. These responsibilities are sensitive and extremely important for the well-being of current and future generations. The public interest and principles of fundamental fairness and due process of law under the state and federal constitutions require that the City and the LADWP conduct their affairs in an objective and impartial manner free of undue influence and in accordance with the law. Therefore, the Act states that to be effective, California's coastal protection program requires public understanding, support, participation, and confidence in the commission and its practices and procedures.

In this case, the draft staff report was only available one week before the public hearing and did not provide the public with sufficient time to read, review and prepare comments to the draft staff report. Due process and principles of fundamental fairness require that the public be provided with sufficient information and with sufficient time to properly evaluate the effects of a development permit application. There is a substantial issue warranting reversal of the Decision related to the draft staff report not being available until after the hearing was noticed.

Further, some of the information in the staff report directly conflicted with the Application causing confusion and does not provide the public with sufficient information to fully understand the Application, consider alternatives, or provide adequate informed opinions at the public hearing. For example, the Staff Report states that the "project cost is approximately \$930,000.00"^{xxiv} while the Application states that the "estimated cost of development is \$276,000.00"^{xxv}. The difference of over \$650,000 does not allow the public to evaluate the development or its alternatives properly. There is no basis or explanation in the Staff Report as to how the \$930,000.00 figure was calculated or what it is based on and this lack of support for this finding creates a substantial issue as to the actual budget and cost of the PTDS and warrants reversal of the Decision and granting of this Appeal.

In fact, if the project budget is indeed \$930,000.00, then the distribution facility could certainly have been placed underground or pad mounted. Failing to provide sufficient accurate information regarding such a significant factor concerning the development fails to allow participation, and destroys any confidence in the practices and due process procedures of the permit process in

which the City engaged in issuing the Decision. In addition, the public is unable to adequately present alternatives or respond to the LADWP's claims that an underground or padmounted facility is too expensive without actually knowing what the DWP is actually spending for the PTDS. The fact that there is no basis or explanation in the Staff Report as to how the \$930,000.00 figure was calculated, this unsupported finding creates a substantial issue as to the actual budget and cost of the PTDS and whether the public was provided accurate information and is a violation of due process and warrants reversal of the Decision and granting of this Appeal.

Another example of information in the Staff Report directly conflicting with the Application and causing confusion is the misleading statement in the Application that the applicant "proposes to install" the PTDS and the failure of the Application to disclose that the LADWP already started with the development and completed a significant portion of the above ground construction of the PTDS. While the Staff Report discloses the fact that the LADWP has already "*installed*" a PTDS, the Application states that the applicant "*proposes to install*" the PTDS. These two statements are confusing, and if the Application is read alone, it is misleading regarding a material fact as to the status of the development of the PTDS. To complicate matters further, the staff report contradicts itself internally by saying, in Section VI - Standard conditions of approval, that the "development *shall not commence* until a copy of the permit is signed"^{xxvi} but the report previously states that the LADWP has already "*installed*" the PTDS.^{xxvii} These inconsistencies make the materials provided impossible to reconcile and create a substantial issue as whether the Application or the Staff Report contains the correct information and the public cannot meaningfully respond to the Application without having accurate information such that the City proceeding with the Application in light of these inconsistencies was a denial of due process which is a substantial issue warranting the reversal of the Decision.

Additional contradictory and faulty information is contained in the Application related to the actual location of the PTDS. Attachment A to the Application, the Assessor's Parcel Map (Exhibit "1" to the Objection, Exhibit "B" hereto), shows the PTDS being installed at the corner of Marquez Ave. and Sunset Blvd. In addition, Attachment D to the Application, Map Showing Single Jurisdiction Boundary (Exhibit "1" to the Objection, Exhibit "B" hereto), and shows the PTDS being installed at the corner of Marquez Ave. and Sunset Blvd. However, the actual installation of the PTDS was not on the corner of Marquez Ave. and Sunset Blvd. and the pictures attached as Exhibit "5" to the Objection, Exhibit "B" hereto, clearly show that the PTDS was installed in the middle of the Parcel Map (Attachment A to the Application), towards the South East corner such that Attachment A and D to the Application are misleading and, in fact, present a misrepresentation as to where the PTDS was actually constructed. Moreover, this means that the Application itself is misleading because it claims that the PTDS is in the single jurisdiction district for the Act and this is untrue and incorrect. The location of the actual installation of the PTDS is in the area

on Attachment D that is shown to be in the dual jurisdiction under the Act. This misleading information and the failure of the LADWP to accurately depict where it had already installed the PTDS and the failure of the Staff Report to address this issue at all is a substantial issue that warrants the granting of the appeal and the reversal of the Decision.

Finally, the PTDS development is described in both the Application and the draft staff report as being "temporary."^{xxviii} But no definition or explanation is provided as to how long the LADWP considers "temporary" to mean. The duration of the proposed "temporary" PTDS development is a significant fact that has been omitted from both the Application and the Staff Report. Although the LADWP may claim that the exact date that the PTDS will be removed cannot be determined at this time, at a minimum an outside date should have been required for approval of the Application in order to provide LADWP an incentive to complete the permanent distribution station, and in order to provide the public a better understanding as to how long the PTDS development will interfere with their properties and when the other negative impacts to the community will terminate. The omission from the Staff Report of any explanation as to what the word "temporary" means in the context of the PTDS and the lack of any deadline for the expiration of the permit create substantial issues as to the violation of due process such that the Decision should be reversed and the appeal granted. At a minimum an outside date for the removal of the PTDS or the expiration of the permit should be imposed and it should be for no longer than four (4) years after the issuance of final permit.

7. The LADWP Has Not Adequately Investigated The Site and Minimized Adverse Impacts.

The Staff Report did not even address in Section 111 the Public Comment that the LADWP has done no analysis or testing to determine if the PTDS development will cause erosion or instability or if it would require structures that alter the land forms or otherwise negatively impacts the surrounding properties.¹ This Public Comment was included in the Objection filed by the Objecting Party and the Staff Report's failure to address the same creates a substantial issue warranting reversal of the Decision.

¹ The installation of the PTDS in this particular location may have negative impact on the planned development of the Property. The present intention is to develop the Property into three single-family homes. The current planned location of the PTDS interferes with access to the Property from Sunset Boulevard and could impact the Property, a fact that will result in a taking of the Property for public use without just compensation, which is illegal. Due to the short period in which to object and the claimed emergency nature of the PTDS, the Objecting Party has not been able to fully investigate this issue and reserves its rights in all regard as to whether the PTDS is a taking and whether it is an inverse condemnation and the damages flowing therefrom.¹

Since the development of the PTDS commenced without CEQA evaluation or a coastal development permit, the construction of the 61' poles without a valid development permit violates the Act and nowhere in the Application of the Staff Report does it show that any reports or investigations were undertaken to determine if the PTDS development will cause erosion or instability or if it would require structures that alter the land forms or otherwise negatively impacts the surrounding properties.

Pursuant to Section 30253 of the Act - Minimization of Adverse Impacts:

"New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b) 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 requires the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs."^{xxix}

The Act requires all of the following findings, none of which appear in the Application or the Staff Report or if they do there is no evidentiary support for the same: assurance of stability and structural integrity, such that the development will 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.

LADWP has not addressed the adverse impact of the PTDS development since it failed even to consider these issues by proceeding under the invalid NOE and without a coastal development permit and there is a substantial issue that there is no evidence to support any finding that the PTDS will 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. As such, the appeal should be granted and the Decision should be reversed.

8. The LADWP Has Failed to Adequately Analyze Alternatives.

The Staff Report did not even address in Section 111 the Public Comment that the LAOWP did not adequately analyze alternatives and this creates a substantial issue warranting reversal of the Decision. The original proposed location for the PTDS was on land owned by the LADWP near an elementary school on Marquez Avenue.^{xxx} The elementary school location was considered by LADWP up until May 1, 2016.^{xxxi} Thereafter, an alternative was identified at 1700 Sunset, the Gabay property, and another alternative was identified at the current site adjacent to the Property, referred to as the old Bernheimer Gardens.

In the Palisades News as recently as May 20, 2016, attached as Exhibit "10" to the Objection, Exhibit "B" hereto, the Property was still listed as the fourth alternative identified by the task force.^{xxxii} Pursuant to Section 30250 of the Act - Location; Existing Developed Area:

"(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas."^{xxxiii}

Thus, the Act requires that new industrial development, which the PTDS is, shall be located where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. Also where feasible, new hazardous industrial development shall be located away from existing developed areas. Therefore, relocating the PTDS to another alternative location was required by the Act and the LADWP and the Staff Report fail to adequately address this creating a substantial issue warranting reversal of the Decision.

The Community Plan and the General Plan require that electrical distribution developments on Sunset Boulevard be built underground and the Staff Report as a condition should have required the LADWP to resubmit an application providing for an underground distribution station or provide all of the information showing that the LADWP analyzed the same to the "maximum extent feasible."

Moreover, the IEEE Report indicates that a padmounted at grade distribution substation can be constructed for approximately \$350,000.00 (See, Section II. BENEFITS 10 Cost), IEEE Report, Exhibit "6."^{xxxiv}

Another alternative that the LADWP and the Staff Report did not consider was that the distribution station be constructed slab on grade. This alternative, while not addressing all community concerns, is more cost effective and partially addresses the visual blight concern. Consultants retained by the Objecting Party have prepared the summary report and the schematic for a grade level padmounted distribution station as described and set forth in Exhibit "7"

to the Objection, Exhibit "B" hereto. In addition, as set forth in the IEEE Report, as compared to pole mounted distribution stations, padmounted substations can now be built smaller with reduced cost, easier construction, greater flexibility, and improved safety and aesthetics. The IEEE Report also states that the padmounted substations are pleasing to the eye, making them a better fit in residential areas, highly scenic areas, coastal communities due to sea salt and moisture damage, and environmentally sensitive areas. The at grade construction of the distribution station could be landscaped to address the physical screening requirement of the General Plan and the Community Plan.^{xxxv} None of these alternatives were addressed in the Application or the Staff Report and they were raised by the Objecting Party in the Objection and the failure of the LADWP and the Staff Report to consider the same and analyze the same to the "maximum extent feasible," as required by the General Plan, is a substantial issue on appeal and warrants reversal of the Decision.

B. THE FINDINGS IN SECTION III OF THE STAFF REPORT ARE NOT SUPPORTED BY THE RECORD OR BY THE APPLICATION.

The following is an analysis of the findings in Section III of the Staff Report and explains why there is no support for the same such that each finding lacking evidentiary support in the record warrants reversal of the Decision. Based on the following analysis, the appeal should be granted and the Decision reversed.

1. The Development is in Conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

- a. The Finding That There Are No Negative Visual Impacts By The PTDS Or That They Can Be Screened By Paint Is Not Supported by Record (Staff Report P. 5).**

As made clear in the Section II.A.I-8, above, related to the adverse impact and visual appearance of the PTDS, it's certainly does not comply with the Act and the Applicant has made no serious efforts to mitigate its negative impacts. Any findings in the Staff Report that the PTDS complies with the Act are not based on substantial evidence or anything contained in the Application or set forth at the hearing on this matter.

Section 30251 of the Act - Scenic and Visual Qualities of the Coastal Act, provides:

"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." xxxvi (emphasis added.)

The PTDS is in essence an industrial facility and the Property and area in which it is proposed to be installed is a residential area. The Act requires the PTDS "*to be visually compatible with the character of surrounding areas.*" A review of the pictures attached as Exhibit "5" to the Objection, Exhibit "B: hereto, makes it clear that the PTDS is not compatible with the character of the surrounding area and is, in fact, an installation which looks completely out of place in this residential neighborhood.

The LADWP in the Application at page 2 indicates that there are 34 - PTDS throughout the City. However, LADWP has not referenced a single location where a PTDS has been installed in a Coastal Zone within the City of Los Angeles. When asked at the hearing to identify a single location in the Coastal Zone in the City where a PTDS was installed, the representatives of the LADWP were unable to do so.

Page 5 of the Staff Report States:

"According to the permit application, measures have been implemented to help screen the structures. Their placement is where other utility poles and lights are located. The poles were painted to blend in with the surroundings. There are no unobstructed views of the ocean from the project site. No adverse impacts to scenic and visual qualities of the coastal area are expected (Figures 3 and 4)."

Placing the PTDS with 61' high Poles and three transformers that are 6'9" tall and 4'7" wide near other poles does not "screen" anything. The painting of the poles is not "screening" and it the absolute minimum that could possibly be conceived of. As shown clearly by the pictures attached as Exhibit "5" to the Objection, Exhibit "B" hereto, the LADWP's proposal to paint the poles and transformers does not mitigate negative visual impacts and any finding claiming that it does, is not supported by substantial evidence or anything in the record other than the bare allegations of an employee of the LADWP. There is no report supporting this screening, there is no treatise or other materials showing that there is an industry standard that painting poles can minimize the impact in a coastal area, there is no explanation of what paint will be used or how or why it will serve to minimize the negative visual impacts.

There are massive impacts to the scenic and visual qualities of the Coastal Zone. This has been attested to by hundreds of neighborhood constituents who have voiced opposition to the PTDS installation, in favor of a more aesthetically palatable alternative

As made clear in the Section II.A.1-8, above, the finding at Page 5 of the Staff Report that, "No Adverse Impacts to the scenic and visual qualities of the coastal area are expected" is not supported by the Application, anything discussed at the hearing and there is no evidence to support the same and significant evidence to the contrary such that this is a substantial issue warranting the granting of the appeal and the reversal of the Decision.

b. The Finding That The Construction Will Not Involve The Transport Of Hazardous Substances Is Not Supported by Record (Staff Report P. 4).

At page 4 of the Staff Report the following finding is made, 'Project construction will not involve the transport of hazardous substances and, thus, there will be spillage of crude oil, gas, petroleum product or hazardous substances as prohibited by the PRC Section 30232.' There is absolutely no reference in the Application or the record from the hearing to support such a finding. The Staff Report contains no reference to any materials and provides no backup whatsoever as to how this finding and conclusion was reached. Thus, there is no substantial evidence or any evidence for this finding.

Moreover, contrary to this finding, the proposed PTDS is an industrial project with three 833KVA electrical transformers. No evidence or explanation has been put forth as to which manufacturer makes the transformers and as to what materials are used to manufacture the same. Such transformers are by their very nature constructed of hazardous substantives include oil, petroleum products, metallic and electrical devices and plastics and insulation. Without knowing the exact manufacturer of the transformers and without reviewing the list of materials or specifications used to assemble the same, the Staff cannot make this finding and there is no evidence whatsoever to support the same in the Application, Staff Report or the record from the hearings. As such, the lack of any evidentiary support for this finding creates a substantial issue warranting that the appeal be granted and the Decision reversed.

c. The Finding That The Project Would Not Affect Geologic, Flood or Fire Risks Is Not Supported by Record (Staff Report P. 5).

As made clear in the Section II.A.7, above, no analysis was done whatsoever in the Application or the Staff Report and no evidence, reports or other materials are cite that would provide a basis for the finding that the PTDS will not affect geological, flood or fire risks. This is simply a bare allegation without reference to anything that could support the same. As such there is a substantial issue as to whether the PTDS will affect geological, flood or fire risks and this warrants granting the application and reversing the Decision.

d. The Finding That The Notice of Exemption Excuses Any Additional Evaluations Under CEQA Is Not Supported by Record (Staff Report P. 7).

As made clear in the Section II.A.4, above, no analysis was done whatsoever in the Application or the Staff Report as to the underlying claim that there was an "emergency" or that the PTDS quailed as an "utility extension" as defined under CEQA that would exempt the PTDS from CEQA. The Staff Report simply indicates that the staff reviewed and considered the NOE, but it

does not indicate that they compared the NOE and the stated basis for the exemption to the actual statutory requirements of CEQA for an emergency or "utility extension" exemption. The fact that those definitions do not support the exemptions claimed under the NOE is not analyzed or discussed in any manner. The failure to do so makes this finding unsupported and creates a substantial issue warranting the granting of the appeal and the reversal of the Decision.

III. SUMMARY OF SUBSTANTIAL ISSUES.

1. Contrary to Section III., A., 1, of the Staff Report, the unpermitted work at the site for the PTDS violated the Act and is a substantial issue and grounds in and of itself to grant the appeal.
2. Contrary to Section III., A., 3, of the Staff Report, the PTDS violates the Act due to, among other things, significant, negative visual impact and this is a substantial issue warranting the granting of this appeal.
3. The Staff Report did not address the safety risks of PTDS falling or being hit or of the oil and chemicals and materials used to construct the PTDS and to manufacture the transformers and these are all substantial issues which the Staff Report completely neglects to address and this warrants the granting of the appeal.
4. Contrary to Section III., A., 4, the PTDS violates the General and the Community Plans and this is a substantial issue that requires granting the appeal and reversing the Decision.
5. The Application and the Staff Report are devoid of any evidence that the undergrounding of the distribution station or other alternatives to the PTDS were analyzed "to the maximum extent feasible" as required by the General Plan and this is a substantial issue warranting granting of the appeal and reversal of the Decision.
6. The PTDS development violates the Community Plan at Page IV-3 which provides, "UTILITIES I. Install utilities underground through assessment districts or other funding, when feasible" and there is no evidence to support any finding as to compliance with this requirement and this is a substantial issue warranting granting of the appeal and reversal of the Decision.
7. The Staff Report and Application contain no evidence as to what the LADWP thinks a padmounted or underground solution will cost and this creates a substantial issue warranting the granting of the appeal as to whether the LADWP "to the maximum extent feasible" analyzed the underground or pad mounted alternatives.
8. Since the Community Plan incorporates the provisions of the Act, all violations under the Act are also violations of the Community Plan. As described above, the LADWP

began development of the PTDS without obtaining a development permit as required by the Act. Thus, the LADWP also violated this section of the Community Plan and the Staff Report does not address this issue. On this basis there is a substantial issue and the appeal should be granted and the Decision reversed.

9. Since the LADWP failed to follow several sections and requirements of the Community and General Plans and the Staff Report contains no evidence to support its findings on these matters, this creates a substantial issue that warrants the reversal of the Decision approving the Application and the LADWP should be ordered to comply with the General Plan and the Community Plan.
10. The Staff Report without any analysis or without commenting upon the analysis offered by the Objecting Party claims that the Application complies with CEQA. This is not true and there is no evidence to support this finding and this creates a substantial issue warranting reversal of the Decision.
11. The Staff Report simply indicates that the staff reviewed and considered the NOE, but it does not indicate that they compared the NOE and the stated basis for the exemption to the actual statutory requirements of CEQA for an emergency or "utility extension" exemption. The fact that those definitions do not support the exemptions claimed under the NOE is not analyzed or discussed in any manner by the Staff Report. The failure to do so makes this finding unsupported and creates a substantial issue warranting the granting of the appeal and the reversal of the Decision.
12. Contrary to Section III., A., 2, of the Staff Report, the unpermitted work at the site for the PTDS creates a conflict of interest for the City, the LADWP and the Bureau and is a substantial issue warranting granting of the appeal.
13. There is a substantial issue related to due process and warranting reversal of the Decision because the draft staff report was not available until after the hearing was noticed.
14. Some of the information in the Staff Report directly conflicted with the Application causing confusion and does not provide the public with sufficient information to fully understand the Application consider alternatives and did not provide adequate information for the public to meaningfully participate in the public hearing and is a violation of due process. For example, the Staff Report states that the "project cost is approximately \$930,000.00" while the Application states that the "estimated cost of development is \$276,000.00" The difference of over \$650,000 does not allow the public to evaluate the development or its alternatives properly. There is no basis or explanation in the Staff Report as to how the \$930,000.00 figure was calculated or

what it is based on and this lack of support for this finding creates a substantial issue as to the actual budget and cost of the PTDS and warrants reversal of the Decision and granting of this Appeal.

15. Misleading information in the Application as to the location of the construction of the PTDS (in the single jurisdiction area) and the failure of the LADWP to accurately depict where it had actually already installed the PTDS (in the dual jurisdiction area) and the failure of the Staff Report to address this issue or even note it is a substantial issue that warrants the granting of the appeal and the reversal of the Decision.
16. The omission from the Staff Report of any explanation as to what the word "temporary" means in the context of the PTDS and the lack of any deadline for the expiration of the permit create substantial issues as to the violation of due process and highlight the lack of any evidentiary support for any finding that the PTDS will, in fact, be "temporary" such that the Decision should be reversed and the appeal granted. At a minimum an outside date for the removal of the PTDS or the expiration of the permit should be imposed and it should be for no longer than four (4) years after the issuance of final permit.
17. LADWP has not addressed the adverse impact of the PTDS development since it failed even to consider these issues by proceeding under an invalid NOE and without a coastal development permit. Thus, there is a substantial issue in that there is no basis or evidence to support any finding that the PTDS will 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. As such, the appeal should be granted and the Decision should be reversed.
18. The Staff Report did not even address in Section III the Public Comment that the LADWP did not adequately analyze alternatives and this creates a substantial issue warranting reversal of the Decision.
19. Relocating the PTDS to another alternative location was required by the Act and the LADWP and the Staff Report fail to adequately address this creating a substantial issue warranting reversal of the Decision.
20. As made clear in the Section II.A.1-8, above, the finding at Page 5 of the Staff Report that, "No Adverse Impacts to the scenic and visual qualities of the coastal area are expected" is not supported by the Application, anything discussed at the hearing and there is no evidence to support the same and significant evidence to the contrary such

that this is a substantial issue warranting the granting of the appeal and the reversal of the Decision.

21. At page 4 of the Staff Report the following finding is made, 'Project construction will not involve the transport of hazardous substances and, thus, there will be spillage of crude oil, gas, petroleum product or hazardous substances as prohibited by the PRC Section 30232.' There is absolutely no reference in the Application or the record from the hearing to support such a finding. The Staff Report contains no reference to any materials and provides no backup whatsoever as to how this finding and conclusion was reached. Thus, there is no substantial evidence or any evidence for this finding.
22. Contrary to the finding in the Staff Report, the proposed PTDS is an industrial project with three 833KVA electrical transformers. No evidence or explanation has been put forth as to which manufacturer makes the transformers and as to what materials are used to manufacture the same. Such transformers are by their very nature constructed of hazardous substances include oil, petroleum products, metallic and electrical devices and plastics and insulation. Without knowing the exact manufacturer of the transformers and without reviewing the list of materials or specifications used to assemble the same, the Staff cannot make this finding and there is no evidence whatsoever to support the same in the Application, Staff Report or the record from the hearings. As such, the lack of any evidentiary support for this finding creates a substantial issue warranting that the appeal be granted and the Decision reversed.
23. As such there is a substantial issue as to whether the PTDS will affect geological, flood or fire risks because there was no CEQA compliance and not reports or analysis whatsoever in the Application or the Staff Report and no evidence cited to support any such findings and this warrants granting the application and reversing the Decision.

IV. LIST OF OTHER PERSONS WHO HAVE AN INTEREST IN THE APPEAL.

Los Angeles Department of Water and Power
Chu Family Living Trust
Richard C. Wahlgren
David Noriani
Palisades Bay Club
Walt Griesser
Pacific Palisades Residence Association

V. CONCLUSION.

Based on the foregoing, the Objecting Party submits that the Decision approving the Application must be reversed because the PTDS violates the Act, the Community Plan, the General Plan, CEQA and adversely impacts the community and the Property and the LADWP should be required to install a pad mounted or underground facility. The Application and Staff Report are lacking material information; contain wrong information and/or conflicting information. The Staff Report lacks support for the vast majority of its findings. These all create substantial issues that warrant the granting of the appeal and the reversal of the Decision. In the alternative, if the Bureau is inclined to deny this appeal, it should only do so on the condition that the approval of the Application for the PTDS be modified to require as a condition of approval that the permit for the PTDS expire without an option for renewal no more than four (4) years after its issuance.

Sincerely,

/s/ Alex Cornelius
Alex Cornelius
COSTELL & CORNELIUS
For 16974 Sunset, LLC

ⁱ There are concerned citizen who have signed a petition objecting to the PTDS and they also objected at the hearing.

ⁱⁱ Property consisting of 4 contiguous parcels with the following APS Numbers: 44115-023-009, 4415-023-010, 4415-022-007, and 4415-021-004.

ⁱⁱⁱ Coastal Act, California Public Resources Code §§ 30000 *et seq.*

^{iv} California Public Resources Code §30003 - Compliance by public agencies

^v California Public Resources Code §30106 - Development.

^{vi} Staff Report prepared by Catalina Hernandez, Section IV (1) on Page 8.

^{vii} Staff Report prepared by Catalina Hernandez, Section IV (6) on Page 8

^{viii} Staff Report prepared by Catalina Hernandez, Page 2.

^{ix} California Public Resources Code §30600 - Coastal development permit; procedures prior to certification of local coastal program. Note that the exception in section (e) does not apply as discuss later in the letter under the definition of "Emergency."

^x Staff Report prepared by Catalina Hernandez, Page 5, as per the Los Angeles General Transportation Plan.

^{xi} California Public Resources Code §30251 - Scenic and visual qualities.

^{xii} Staff Report prepared by Catalina Hernandez, Page 5.

^{xiii} Staff Report prepared by Catalina Hernandez, Page 5, and according to the Mobility Plan 2035, an element of the General plan of the City of Los Angeles.

^{xiv} Ibid., Page IV-3.

^{xv} Brentwood-Pacific Palisades Community Plan part of the General Plan - City of Los Angeles.

^{xvi} Ibid., Page I-2 and 3.

^{xvii} Ibid., Page III-7.

^{xviii} CEQA (California Public Resources Code §§21000-21189) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§15000-15387).

^{xix} CEQA Guidelines §15303(d).

^{xx} CEQA §21060.3.

^{xxi} Los Osos Valley Associates v. City of San Luis Obispo, 30 Cal. App. 4th 1670, 1682 (1994) (finding that the City's choice to drill water wells as a way to conserve water was not an emergency under CEQA because it constituted a choice among many that the City made over a considerable period of time).

-
- ^{xxiii} California Public Resources Code §30811.
- ^{xxiii} California Public Resources Code §30320 Findings and declarations.
- ^{xxiv} Staff Report prepared by Catalina Hernandez, paragraph 1.(C.) Project Costs on Page 2.
- ^{xxv} LADWP Application for Coastal Development Permit Section II.(3) on Page 4.
- ^{xxvi} Staff Report prepared by Catalina Hernandez, Page 7.
- ^{xxvii} Ibid., Page 1.
- ^{xxviii} Ibid., Page 1 states "LADWP installed a temporary Pole-Top Distribution Station" and also "As a temporary measure"; the Application, Page 1, Section 2 states "LADWP proposes to install temporary Pole-Top Distribution Station"
- ^{xxix} California Public Resources Code §30253 - Minimization of adverse impacts.
- ^{xxx} Pacific Palisades Community Council Information dated March 19, 2016. Listing both empty lots on Sunset as alternatives. In addition, it listed the corner of Las Lomas/Sunset and Las Liones/Sunset (so. of Sunset) and corner of Las Lomas/Sunset and Las Casas/Sunset (so. of Sunset) as additional alternatives.
- ^{xxxi} LADWP press release dated May 1, 2016.
- ^{xxxi} The alternatives identified were: "two were near Paseo Miramar off Via Nichols, one was between the upper Bel-Air Bay Club and Malibu Village and the fourth was the old Bernheimer Gardens site off of Sunset."
- ^{xxxii} California Public Resources Code §30250 Location; existing developed area.
- ^{xxxiv} LADWP press release date February 9, 2016, Page 2.
- ^{xxxv} Ibid. The General Plans states that "Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway."
- ^{xxxvi} California Public Resources Code §30251 - Scenic and visual qualities.

Exhibit “A”

**BOARD OF PUBLIC WORKS
MEMBERS**

**KEVIN JAMES
PRESIDENT**

**HEATHER MARIE
REFENNING
VICE PRESIDENT**

**MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE**

**JOEL F. JACINTO
COMMISSIONER**

**LUZ M. RIVAS
COMMISSIONER**

**FERNANDO CAMPOS
EXECUTIVE OFFICER**

CITY OF LOS ANGELES

CALIFORNIA



**ERIC GARCETTI
MAYOR**

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING**

**GARY LEE MOORE, PE, ENV SP
CITY ENGINEER**

**1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213**

<http://eng.lacity.org>

December 5, 2016

To All Interested Parties:

NOTICE OF DECISION ON LOCAL COASTAL DEVELOPMENT PERMIT 16-14

**LADWP Temp Pole Top Distribution Station –Sunset Bl at Marquez Ave.
(W.O. UR400725)**

The above referenced Coastal Development Permit was approved with conditions.

A public hearing was held on November 9, 2016 at the Palisades Branch Library located at 861 Alma Real Drive. Community members expressed concerns regarding impacts to scenic and visual qualities, notification process, compatibility with the City's General Plan and the Brentwood-Pacific Palisades Community Plan regarding placing new utilities underground, and California Environmental Quality Act (CEQA) adequacy.

The coastal issues raised are discussed in the Final Staff Report. The proposed project is found to be in conformity with Chapter 3 of the California Coastal Act.

Provided no appeal is filed* in the office of the City Engineer within ten (10) calendar days (to be received no later than 5 p.m. on December 15, 2016), the permit will be issued, along with a Notice of Permit Issuance, to the applicant and to the California Coastal Commission, South Coast Area Office. Filing a Notice of Permit Issuance or Denial with the Coastal Commission starts a 20 working day period during which an appeal may be made to or by the Commission. The proposed development is within the single coastal zone jurisdiction of the City of Los Angeles. Since the proposed project is a designated "Major public work" per §13012 of the California Code of Regulations, the California Coastal Commission will review the proposed development.

If you have any questions, or require an appeal form, please contact Catalina Hernandez at (213) 485-5756.

Sincerely,

Gary Lee Moore, P.E., ENV SP
City Engineer



By Maria Martin, Manager
Environmental Management Group

MM/CH: CDP 16-14 Notice of Decision.doc

* If you wish to appeal this decision, notice in writing of the appeal must be received by the Bureau of Engineering, Attn: Catalina Hernandez, 1149 S. Broadway, Suite 300, Los Angeles, CA 90015 by 5:00 p.m. on or before the 10th calendar day following the decision being appealed. Such written notice may be submitted either by: (a) delivery of a completed Notice of Appeal, or (b) by other communication *in writing*, such as a fax, stating the name, address and telephone number of the applicant and appellant, the date and nature of the decision being appealed, the Coastal Development case number and identification of the proposed development. Comments should be faxed to (213) 847-0656 and e-mails to Catalina.Hernandez@lacity.org. When the appellant utilizes procedure (b) above, he/she must subsequently transmit a completed Notice of Appeal within five calendar days of the initial filing of the appeal.

Exhibit “B”



COSTELL & CORNELIUS
LAW CORPORATION

1299 OCEAN AVENUE, SUITE 450
SANTA MONICA, CALIFORNIA 90401
Direct Dial: (310) 752-0442
Phone: (310) 458-5959
Facsimile: (310) 458-7959
Sender's Email: Acornelius@costell-law.com

November 8, 2016

VIA OVERNIGHT MAIL AND EMAIL

City of Los Angeles Department of Public Works, BOE EMG
Attention: Catalina Hernandez, Environmental Supervisor
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, California 90015-2213
(Catalina.Hernandez@lacity.org)

Re: **COSTAL DEVELOPMENT PERMIT APPLICATION NO. 16-14**
Proposed installation of LADWP Temporary Pole Top Distribution Station
Sunset Blvd. at Marquez Ave.

Dear Department of Public Works,

This letter is an objection to the Costal Development Permit Application Number 16-14, attached hereto as Exhibit "1" (the "Application"), filed by the Los Angeles Department of Water and Power ("LADWP") for a Temporary Pole Top Distribution Station ("PTDS") located near the intersection of Sunset Boulevard and Marquez Avenue in the city of Pacific Palisades, California. The City of Los Angeles (the "City") is presently exercising jurisdiction over the Application but should deny the Application.¹ The Application should be denied for the reasons set forth herein and/or modified as proposed herein including, but not limited to, to require compliance with the Los Angeles General Plan (the "General Plan") and the Brentwood-Pacific Palisades Community Plan (the "Community Plan") by situating the PTDS underground and setting a deadline for the removal of the PTDS as the LADWP and the City both acknowledge that the PTDS is temporary.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26' x 7'5", three 8333-KVA transformers measuring 6'9" tall and 4'7" wide, cross arms, circuit breakers, switches, and a controller. The

¹ Due to various reasons including conflicts of interest, if the City does not outright deny the Application it should defer and abstain from ruling on the Application and refer it to the California Coastal Commission (the "Commission").

project also requires the installation of an underground vault. The Notice for the Hearing on November 9, 2016 at 1:30 p.m. is attached hereto as Exhibit "2."

We represent 16974 Sunset Blvd, LLC ("Objecting Party") which is an "Aggrieved Person" under the California Coastal Act, California Resources Code §§ 30000, et seq. (the "Act").ⁱ A number of community members are also opposed to the PTDS. The Facebook Page for the Pacific Palisades Residence Association with a post opposed to the PTDS shows 830 likes, 45 shares and 4 comments; a Change.Org petition opposing the PTDS has 207 signatures; and the Save the Palisades Bluffs Facebook post shows 192 likes, 28 shares and 18 comments. The screenshots of the Facebook Posts and the Change.Org petition are collectively attached hereto as Exhibit "3",

The Objecting Party has reviewed the Application and staff report (the Staff Report attached hereto as Exhibit "4") and it is familiar with the site of the PTDS as it is adjacent to the residential development site located at 16974 West Sunset Boulevard, Pacific Palisades, California (the "Property").ⁱⁱ Since the PTDS and the Property are located within the coastal zone, as confirmed by the City's ZIMAS zoning information system, it is protected by the Act.ⁱⁱⁱ Under § 30003 of the Act - Compliance by Public Agencies, both the City and the LADWP are required to comply with the Act:

All public agencies and all federal agencies, to the extent possible under federal law or regulations or the United States Constitution, shall comply with the provisions of this division."

Thus the Department of Public Works is required to comply with all the provisions of the Act.^{iv}

1. THE PTDS IS ALREADY IN VIOLATION OF THE ACT AND MUST BE REMOVED.

Construction of the PTDS began on or about July 6, 2016 *without* a permit complying with the Act and with knowledge by LADWP that the work required a permit since it was a development as defined under the Act. Section 30106 of the Act - Development, defines 'Development' to mean "on land, in or under water, the placement or erection of any solid material or structure ..., *including any facility of any private, public, or municipal utility*;...

As used in this section, "structure" includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line." (emphasis added.)

Development includes, but is not limited to, the construction of any structure such as an electrical power transmission and distribution line.^v The

installation of a PTDS constitutes "development" as defined in the Act thus triggering the requirement of a coastal development permit *prior* to the commencement of any development or installation of any PTDS structures.

Prior to having any kind of coastal development permit issued, LADWP vehicles trespassed onto the Property and Objecting Party's representatives demanded that the LADWP personnel leave the Property immediately, which the LADWP refused. Thereafter, a significant portion of the installation of the PTDS continued without a permit in violation of the Act and only now, after-the-fact, has the LADWP sought to attempt to comply with the Act by filing the Application. In a shocking admission as to how improper the LADWP's conduct was, Section VI - Standard conditions of approval of the draft staff report, states that the "development shall not commence until a copy of the permit is signed."^{vi} (emphasis added.) Yet, the LADWP has already in fact commenced construction of the PTDS without a permit, in violation of its own staff report and the Act.

The work performed by LADWP, including the actual installation of the 61' metal poles for the PTDS, was done in an effort to "ram" the project through in violation of the Act. The LADWP is forcing the PTDS on the Community as a "done-deal", a fate-acompli', which the LADWP insists the Community must accept without question because money has already been spent and construction started. This "ram-rod" approach by the LADWP is heavy handed, improper, a violation of the Act and the General and Community Plans and a complete trampling of the community's and property owners' rights to have a say in "development" within the coastal zone. The LADWP is trying to "boot-strapped" itself into approval of the Application by violating the law and starting the work and spending rate payer and tax payer money without a valid coastal permit. Had LADWP actually followed the correct process (which they have admitted they did not because they are now seeking a coastal permit that they should have applied for in the first place), the public would have been given a real opportunity to give meaningful input and potentially change the location or an alternative development solution could have been pursued at grade or underground. If a private citizen had proceeded to construct 61' structures in the coastal zone without a coastal development permit such construction would be red tagged and ordered to be removed. The LADWP is subject to the same provisions of the Act. This "act first and seek permission later" approach of the LADWP is reason enough to deny the Application and order removal of the PTDS.

Pursuant to Section 30600 of the Act - Coastal Development Permit; Procedures Prior to Certification of Local Coastal Program:

Except as provided in subdivision (e), and in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person, as defined in

Section 21066, wishing to perform or undertake any development in the coastal zone, other than a facility subject to Section 25500, shall obtain a coastal development permit."

The Property and the site of the PTDS "is located within the California Coastal Zone and is considered 'single coastal jurisdiction' (i.e. the Coastal Zone of the City of Los Angeles alone)", as defined by the Act, and the draft staff report confirms the same.^{vii} The City and the LADWP were required prior to construction of the PTDS to comply with the § 30600 of the Act.^{viii}

The LADWP claims it has already spent \$250,000.00 on installing the PTDS. However, now the City (of which the LADWP is a division/agency) is both requesting approval of the Application and at the same conducting the hearing and deciding whether to approve the same. As such, the City has a conflict of interest and is highly motivated to approve the Application despite it violating the Act, the General Plan, the Community Plan and CEQA. If the City does not approve the Application, then one of its agencies - the LADWP, could be accused of misuse of public rate payer funds because the LADWP commenced the work on the project without first obtaining a coastal development permit. This issue could cloud the City's judgment and raises the specter of the City having a conflict of interest in hearing and ruling on this Application or, at a minimum, gives the appearance of a conflict of interest. Under these circumstances, the City should deny the Application outright and, if it does not, it should recuse itself, and refer this Application directly to the Commission and abstain from ruling on the same.

The Coastal Act Section 30811 - Restoration Order; Violations, provides:

"In addition to any other authority to order restoration, the commission, a local government that is implementing a certified local coastal program, or a port governing body that is implementing a certified port master plan may, after a public hearing, order restoration of a site if it finds that the development has occurred without a coastal development permit from the commission, local government, or port governing body, the development is inconsistent with this division, and the development is causing continuing resource damage."^{ix} The Coastal Act empowers local governments to address permit violations by issuing an order of restoration of a site if it finds that the development has occurred without a coastal development permit.

Since the LADWP failed to follow the law to which the public is required to adhere, and brazenly moved forward with the development of the PTDS

without a permit, the LADWP should be required to remove the current illegally installed development of the PTDS and restore the Property to its original condition until the permit appeal process is exhausted, and until (if and when) a final permit is issued to the LADWP for the legal installation of the PTDS.

II. THE PTDS VIOLATES THE ACT DUE TO VISUAL BLIGHT AND SAFETY.

Pacific Palisades is a small scenic community where development proposals should be considered very carefully. The Property and the proposed site for the PTDS are located in a very sensitive area off Sunset Boulevard which is designated as a scenic highway by the City of Los Angeles.^x The installation of the PTDS will create a visual blight, contrary to the claims in the staff report. The poles are in excess of 60' and are, effectively, an industrial development and negatively impact the views along Sunset Boulevard and the properties that face along Sunset Boulevard as well as the Property. The poles are out of place and are wholly incompatible with the surrounding residential development. Pictures showing the negative impact of the poles that have been installed at the site of the PTDS are attached hereto as Exhibit "5." Scenic features include views of the estates, which are negatively impacted by the PTDS. Section 30251 of the Act - Scenic and Visual Qualities of the Coastal Act, provides:

"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."^{xi} (emphasis added.)

Thus, the scenic and visual qualities of coastal areas are to be considered and protected as a resource of public importance. Permitted development, including development like the PTDS, shall be sited and designed to protect views to and along the scenic coastal areas. In order to implement this, both the Community Plan and the General Plan require that electrical and utility installations be installed underground. Sunset Boulevard is heavily traveled by many tourists and there are a number of residences that face Sunset Boulevard

that will have their residential views marred and interfered with by the PTDS. Moreover, the painting of the PTDS as recommended in the staff report will do absolutely nothing to mitigate the negative impact of the two (2) 61' poles and three (3) transformers of 6.9' x 4.5' suspended about 30' in the air.^{xii} The proposal that paint could somehow mitigate the negative impact of the PTDS is simply not credible and must be rejected.

Safety is also a major concern since Sunset Boulevard is a major thoroughfare with a 35 mile per hour speed limit and with an extremely large number of curves. The incident in Arleta, California on February 18, 2016, where a driver was killed when he crashed into a PTDS and the transforms fell on his vehicle, is a real possibility for the present location of the PTDS given the traffic count and volume on Sunset Boulevard and that fact that the PTDS is being situated in the public right of way less than ten feet from the road. The PTDS is unmonitored and contains oil which could leak onto the sidewalk or street. Finally, other areas in the Palisades Community have objected to the PTDS on the basis of concerns about the impact of electromagnetic radiation or fields ("EMF") created by the transforms and all of those same concerns apply to the site selected for the PTDS as the Property will be developed into single family homes and there currently is an apartment building with children and families located adjacent to the PTDS site. On this issue, both an underground or at grade installation would reduce the impact of any EMF concerns as recognized in the 2002 report for the IEEE Rural Electrical Power Conference in Colorado Spring, May 2002 attached as Exhibit "6," (entirely padmounted installations of distribution stations have less EMF issues than pole mounted installations).

Since permitted development shall be sited and designed to protect views to and along scenic coastal areas, the PTDS should be visually compatible with the character of surrounding areas and should be installed in another location or underground (as required by the General and Community Plans). Moreover, safety concerns have not been addressed by the LADWP and the PTDS as proposed is a hazard to the community. The Application should be denied and the PTDS relocated or in the alternative constructed underground and appropriately landscaped in order to protect mitigate its negative, industrial visual blight and to reduce the potential hazardous impacts of the PTDS.

III. CURRENT VIOLATIONS OF THE LOS ANGELES GENERAL PLAN AND THE BRENTWOOD-PACIFIC PALISADES COMMUNITY PLAN.

The Los Angeles General Plan (the "General Plan") states: "*To the maximum extent feasible, all new or relocated electric . . . utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground.*" ^{xiii} (emphasis added.) Since the PTDS is within 500 feet of the centerline of a Scenic Highway, Sunset Boulevard, the General Plan for the City requires that the project be built underground. Although the

LADWP has stated that locating the distribution station underground is not an option due to the size, complexity, and risk of water intrusion, as set forth below, the electrical construction consultants of the Objecting Party have indicated that a distribution station can be safely built underground (or at grade and padmounted).

LADWP has not adequately explored the feasibility of an underground solution and it cannot violate the General and Community Plans which require that any new distribution station within five hundred feet of the center line of Sunset Boulevard be built underground or that all new electrical distribution stations be built underground in the Brentwood-Pacific Palisades area. There are no reports or analysis, cost estimates or feasibility analysis, simply conclusory statements which shows that the LADWP never even really considered the underground solution. The Application must be denied until the LADWP presents an alternative that provides for an underground distribution facility or sets forth what analysis it did to determine the "maximum extent" of the feasibility of the same.

The PTDS development violates the Community Plan at Page IV-3 which provides, "UTILITIES 1. Install utilities underground through assessment districts or other funding, when feasible."^{xiv}

LADWP claims that the PTDS cannot be situated underground or padmounted but the Objecting Party has engaged a consultant, Integrated Environmental Technologies and they have prepared a schematic for an alternative padmounted solution with pricing and performance specifications similar to the equipment to be installed at the PTDS. The schematic for the padmounted distribution station and the summary report of the consultants is attached hereto as Exhibit "7." The consultants have indicated that an underground or padmounted distribution station is completely feasible but that the LADWP has not, in the Application seriously analyzed or considered the same. Also the consultants estimate that the cost for a padmounted solution is approximately \$100,000.00 (without taking into account the LADWP's mandated labor policies which could increase the price). Thus, in accordance with the requirements of the General Plan there is a feasible method to install the substation underground or at a minimum as a padmounted distribution station which would address many of the concerns. In addition, the alleged water intrusion issues cited by the LADWP can be addressed with a double wall structure as described and built in Zurich, Switzerland and discussed in the materials provided by Poyray-Electrical Works of Zurich Oerlikon Substation per the report attached as Exhibit "8." The LADWP has not even explained why they believe that there are groundwater or water intrusion issues at the site. Frankly, the proposed site is at the top of canyon bluff of over 100' and there is no finding in the Application of staff report that there is, in fact, a groundwater or water intrusion condition. Again the statements in the Application and staff report as to water issue are conclusory and speculation without any type of analysis and certainly do not meet the "maximum extent feasible" requirement

under the General Plan to site electrical distribution stations underground. Thus, LADWP should be required to follow the Community Plan and the General Plan and install the distribution station underground and the Application should be denied because it does not comply with the Community and General Plans.

The PTDS development violates Pages 1-2 and 3 of the Community Plan^{xv} which provides the following residential issues:

- Need to protect environmentally sensitive areas, scenic views and scenic corridors.
- Need to improve the visual environment through the development of appropriate design criteria and controls.^{xvi}

The need to protect environmentally sensitive areas and scenic corridors has been violated by the PTDS since it creates a visual blight and is, effectively, an industrial development in a residential area. Also the need to improve the visual environment through the development of appropriate design criteria and controls has been violated since the appropriate design criteria is an underground installation of the PTDS as dictated by the Community and General Plans.

The PTDS development violates the Plan at Page III-7 which provides:

"1-6.6 The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.

* * *

Program: Condition new development to protect views from public roadways and parklands.^{xvii}

The PTDS development violates the condition that new developments protect views from public roadways, since the PTDS is located adjacent to Sunset Boulevard and does not protect the views from a public roadway and creates a negative visual impairment of the scenic views of the residential coastal neighborhood surrounding Sunset Boulevard. Therefore, since installation of the distribution station can be constructed underground as described above, the PTDS violates the General and Community and Plans and the Act that require that development be integrated with and be visually subordinate to natural features and terrain.

Development of the PTDS also violates sections of the Community Plan on Pages III-15 and 16 which provides:

"COASTAL RESOURCES Development in the Coastal Zone is subject to the provisions of the California Coastal Act. As of 1997, the City had not prepared a local coastal plan (LUP/LCP) for the Pacific Palisades Coastal areas."

Since the Community Plan incorporates the provisions of the Act, all violations under the Act are also violations of the Community Plan. As described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. Thus, LADWP also violated this section of the Community Plan.

Goal 5 of the Community Plan entitled "PRESERVATION OF THE SCENIC AND VISUAL QUALITY OF COASTAL AREAS," provides for the following objectives, policies, and programs which have been violated by the PTDS development:

"Objective 5-1 To govern the manner in which the City of Los Angeles implements the California Coastal Act of 1976, as well as the establishment of land uses and their subsequent development.

Policies 5-1.1 The location and amount of new development should maintain and enhance public access to the coast.

Program: *Permitted development shall be designed to protect views to 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 the visually degraded areas.*

Program: Coastal Development Permits are required for new development which establish conditions for new development.

The PTDS development violates the objective of the Community Plan of implementing the provisions and requirements of the Act since, as described above, the LADWP began development of the PTDS without obtaining a development permit as required by the Act. The PTDS development also violates the objective of the Community Plan regarding protecting scenic coastal areas by building the distribution station above ground on 61' poles creating visual blight and placing an industrial development in a residential area. The PTDS development further violates the objective of the Community Plan by not being visually compatible with the character of surrounding areas by building

the PTDS above ground on poles creating negative visual impacts and interfering with scenic coastal areas instead of constructing the distribution station underground. The PTDS as proposed also violates the objective of the Community Plan by not obtaining a coastal development permit for a public works projects and by not analyzing or setting forth any findings that the PTDS is consistent with the Community Plan.

Since the LADWP failed to follow several sections and requirements of the Community and General Plans, the Application should be denied and the PTDS relocated or it should be installed underground.

IV. THE LADWP HAS NOT COMPLIED WITH CEQA AND IT IS A REQUIREMENT FOR THE PTDS.

The California Environmental Quality Act ("CEQA")^{xviii} institutes a statewide policy of environmental protection. CEQA does not directly regulate land uses, but instead requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and adopt all feasible measures to mitigate those impacts. CEQA makes environmental protection a mandatory part of every California state and local agency's decision-making process.

A notice of exemption ("NOE"), attached hereto as Exhibit "9," was filed by LADWP on May 25, 2016. The exemption was based upon two grounds: 1) as an electrical and other utility extension, and 2) as an emergency project. The first ground cited is that the project is subject to a Class 3 categorical exemption for "electrical . . . and other utility extensions".^{xix} However, a PTDS is plainly not an electrical or utility "extension," but rather a new facility and therefore not exempt. The second ground cited is that the project qualifies for a statutory exemption as an emergency project. There has been no evidence that would suggest that placing a PTDS adjacent to the Property was necessary to prevent or mitigate an "emergency."

"Emergency," as defined by CEQA, means a "sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. 'Emergency' includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage."^{xx} Under case law, the definition of an emergency is limited to an occurrence and not a condition, meaning that the occurrence must involve a clear and imminent danger, demanding immediate action.^{xxi} The decision to place the PTDS in front of the Property was the result of years-long, prolonged process in response to consistent outages in the Pacific Palisades. In fact, in 2012, LADWP first considered constructing a power distribution station on its property near Marquez Charter School, on Marquez Avenue. The decision to place the PTDS adjacent to the Property was not an action taken in response to a sudden or unexpected occurrence necessary to prevent or mitigate an

emergency power outage in the Pacific Palisades but, rather, was a decision apparently reached over an extended period of time in response to a known condition.

The NOE is invalid because the LADWP was required to comply with all CEQA procedures in order to, among other things, identify the significant environmental impacts of the PTDS on the community, and to avoid or mitigate those impacts. As such the Application should be denied due to the failure of the LADWP to comply with CEQA.

V. THE LADWP HAS NOT ADEQUATELY INVESTIGATED THE SITE AND NOT MINIMIZED ADVERSE IMPACTS.

Since the development of the PTDS commenced without CEQA evaluation or a coastal development permit, the construction of the 61' poles without a valid development permit violates the Act. The LADWP has done no analysis or testing to determine if the PTDS development will cause erosion or instability or if it would require structures that alter the land forms along bluffs and cliffs or otherwise negatively impacts the surrounding properties.² Pursuant to Section 30253 of the Act - Minimization of Adverse Impacts:

"New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b) 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."²

The Act requires all of the following findings, none of which appear in the Application or the staff report: assurance of stability and structural integrity, such that the development will 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.

² The installation of the PTDS in this particular location may have a significant negative impact on the planned development of the Property. The present intention is to develop the Property into three single-family homes. The current planned location of the PTDS interferes with access to the Property from Sunset Boulevard and could impact the Property, a fact that will result in a taking of the Property for public use without just compensation, which is illegal. Due to the short period in which to object and the claimed emergency nature of the PTDS, the Objecting Party has not been able to fully investigate this issue and reserves its rights in all regard as to whether the PTDS is a taking and whether it is an inverse condemnation and the damages flowing therefrom. ²

LADWP has not addressed the adverse impact of the PTDS development since it failed even to consider these issues by proceeding under the invalid NOE and without a coastal development permit. The LADWP should be required to investigate and follow the CEQA requirements and those of the Act to provide the public with the legally required information concerning the proposed PTDS development and its potential negative impacts. As such the Application should be denied.

VI. THE LADWP HAS VIOLATED DUE PROCESS.

The LADWP violated the Act and state and federal constitutional due process by failing to give sufficient notice and by failing to make materials and accurate information related to the Application available to the public in a timely manner and by holding the hearing on shortened notice after the LADWP had already constructed a significant portion of the PTDS without the proper permit. Pursuant to Section 30320 of the Act - Findings and Declarations:

"(a) The people of California find and declare that the duties, responsibilities, and quasi-judicial actions of the commission are sensitive and extremely important for the well-being of current and future generations and that the public interest and principles of fundamental fairness and due process of law require that the commission conduct its affairs in an open, objective, and impartial manner free of undue influence and the abuse of power and authority. It is further found that, to be effective, California's coastal protection program requires public awareness, understanding, support, participation, and confidence in the commission and its practices and procedures. Accordingly, this article is necessary to preserve the public's welfare and the integrity of, and to maintain the public's trust in, the commission and the implementation of this division.

(b) The people of California further find that in a democracy, due process, fairness, and the responsible exercise of authority are all essential elements of good government which require that the public's business be conducted in public meetings, with limited exceptions for sensitive personnel matters and litigation, and on the official record. Reasonable restrictions are necessary and proper to prevent future abuses and misuse of governmental power so long as all members of the public are given adequate opportunities to present their views and opinions to the commission through written or oral communications on the official

record either before or during the public hearing on any matter before the commission."^{xxiii}

The Act imposes duties, responsibilities, and quasi-judicial actions on local governments issuing development permits. These responsibilities are sensitive and extremely important for the well-being of current and future generations. The public interest and principles of fundamental fairness and due process of law under the state and federal constitutions require that the City and the LADWP conduct their affairs in an objective and impartial manner free of undue influence and in accordance with the law. Therefore, the Act states that to be effective, California's coastal protection program requires public understanding, support, participation, and confidence in the commission and its practices and procedures.

In this case, the draft staff report was only available one week before the public hearing and did not provide the public with sufficient time to read, review and prepare comments to the draft staff report. Due process and principles of fundamental fairness require that the public be provided with sufficient information and with sufficient time to properly evaluate the effects of a development permit application.

Further, some of the information in the staff report directly conflicts with the Application causing confusion and does not provide the public with sufficient information to fully understand the Application, consider alternatives, or provide adequate informed opinions at the public hearing. For example, the staff report states that the "project cost is approximately \$930,000.00"^{xxiv} while the Application states that the "estimated cost of development is \$276,000.00"^{xxv}. The difference of over \$650,000 does not allow the public to evaluate the development or its alternatives properly. In fact, if the project budget is indeed \$930,000.00, then the distribution facility could certainly have been placed underground. Failing to provide sufficient accurate information regarding such a significant factor concerning the development fails to allow participation, and destroys any confidence in the practices and due process procedures of the permit process in which the City will be engaged at the hearing. In addition, the public is unable to adequately present alternatives or respond to the LADWP's claims that an underground facility is too expensive without actually knowing what the DWP is actually spending for the PTDS.

In addition, from the Application and the staff report it is unclear as to whether the LADWP actually had to purchase the two (2) 61' poles and transformers or whether these were already purchased and warehoused and the LADWP simply started building the PTDS because it had these materials on hand and did not want to spend the time or money to acquire the underground equipment as required by the "maximum extent feasible" standard of the General Plan. The Public has a right to know, did the LADWP just go ahead with the PTDS without a permit because it had these materials on hand and did the

LADWP even price or look at the underground transformers and materials mandated by the General Plan?

Another example of information in the staff report directly conflicting with the Application and causing confusion is the misleading statement in the Application that the applicant "proposes to install" the PTDS and the failure of the Application to disclose that the LADWP has already started with the development and completed a significant portion of the above ground construction of the PTDS. While the draft staff report discloses the fact that the LADWP has already "*installed*" a PTDS, the Application states that the applicant "*proposes to install*" the PTDS. These two statements are confusing, and if the Application is read alone, it is misleading regarding a material fact as to the status of the development of the PTDS. To complicate matters further, the staff report contradicts itself internally by saying, in Section VI - Standard conditions of approval, that the "development *shall not commence* until a copy of the permit is signed"^{xxvi} but the report previously states that the LADWP has already "*installed*" the PTDS.^{xxvii} These inconsistencies require that the Application be denied at this stage and that the LADWP reapply and provide the correct information as to the status of the PTDS development.

Finally, the PTDS development is described in both the Application and the draft staff report as being "temporary."^{xxviii} But no definition or explanation is provided as to how long the LADWP considers "temporary" to mean. The duration of the proposed "temporary" PTDS development is a significant fact that has been omitted from both the Application and the draft staff report. Although the LADWP may claim that the exact date that the PTDS will be removed cannot be determined at this time, at a minimum an outside date should be required for approval of the Application in order to provide LADWP an incentive to complete the permanent distribution station, and in order to provide the public a better understanding as to how long the PTDS development will interfere with their properties and when the other negative impacts to the community will terminate. No permit should be issued without an outside date for the removal of the PTDS.

Given the failure of a proper notice period and the confusing and contradicting information in the Application and the draft staff report, a reasonable person is unable to adequately understand or participate at the hearing and this denies them due process. In addition, since the length of the temporary PTDS development has not been defined, the Application should be denied or at a minimum an outside date for its removal or the permits expiration should be included in any permit issued and it should be no longer than four (4) years after the issuance of any permit.

VII. THE LADWP HAS FAILED TO ADEQUATELY ANALYZED ALTERNATIVES.

The original proposed location for the PTDS was on land owned by the LADWP near an elementary school on Marquez Avenue.^{xxix} The elementary school location was considered by LADWP up until May 1, 2016.^{xxx} Thereafter, an alternative was identified at 1700 Sunset, the Gabay property, and another alternative was identified at the current site adjacent to the Property, referred to as the old Bernheimer Gardens. In the Palisades News as recently as May 20, 2016, attached hereto as Exhibit "10," the Property was still listed as the fourth alternative identified by the task force.^{xxxi} Pursuant to Section 30250 of the Act - Location; Existing Developed Area:

"(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas."^{xxxi}

Thus, the Act requires that new industrial development, which the PTDS is, shall be located where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. Also where feasible, new hazardous industrial development shall be located away from existing developed areas. Therefore, relocating the PTDS to another alternative location is required by the Act.

The Community Plan and the General Plan require that electrical distribution developments on Sunset Boulevard be built underground and the LADWP should be required to resubmit an application providing for an underground distribution station.

Moreover, the IEEE Report indicates that a padmounted at grade distribution substation can be constructed for approximately \$350,000.00 (See, Section II. BENEFITS 10 Cost), IEEE Report, Exhibit "6."^{xxdii}

As a last alternative, we recommend that the distribution station be constructed slab on grade. This alternative, while not addressing all our concerns, is more cost effective and partially addresses the visual blight concern. Consultants retained by the Objecting Party have prepared the summary report and the schematic for a grade level padmounted distribution station as described and set forth in Exhibit "7." In addition, as set forth in the IEEE Report, as compared to pole mounted distribution stations, padmounted substations can now be built smaller with reduced cost, easier construction, greater flexibility, and improved safety and aesthetics. The IEEE Report also states that the padmounted substations are pleasing to the eye, making them a better fit in residential areas, highly scenic areas, coastal communities due to sea salt and moisture damage, and environmentally sensitive areas. The at grade construction of the distribution station could be landscaped to address the physical screening requirement of the General Plan and the Community Plan.^{xxxiv}

Based on the foregoing and on any comments presented at the hearing, the Objecting Party submits that the Application must be denied because it violates the Act, the Community Plan, the General Plan, CEQA and adversely impacts the community and the Property. In the alternative, the Application for the PTDS should only be approved if it is installed underground or at grade and the permit for the same has an expiration of date of no more than four (4) years after its issuance. Finally, if the City proposes to approve the Application then it should abstain due to potential conflicts of interest and refer this matter to the Commission.

Sincerely,

/s/ Alex Cornelius
Alex Cornelius
COSTELL & CORNELIUS

ⁱ There are concerned citizen who have signed a petition objecting to the PTDS and they will also be objecting at the hearing.
ⁱⁱ Property consisting of 4 contiguous parcels with the following APS Numbers: 44115-023-009, 4415-023-010, 4415-022-007, and 4415-021-004.

ⁱⁱⁱ Coastal Act, California Public Resources Code §§ 30000 *et seq.*

^{iv} California Public Resources Code §30003 - Compliance by public agencies

^v California Public Resources Code §30106 - Development.

^{vi} Draft Staff Report prepared by Catalina Hernandez, Section IV (1) on Page 7.

^{vii} Draft Staff Report prepared by Catalina Hernandez, Page 2.

^{viii} California Public Resources Code §30600 - Coastal development permit; procedures prior to certification of local coastal program. Note that the exception in section (e) does not apply as discuss later in the letter under the definition of "Emergency."

^{ix} California Public Resources Code §30811.

^x Draft Staff Report prepared by Catalina Hernandez, Page 5, as per the Los Angeles General Transportation Plan.

^{xi} California Public Resources Code §30251 - Scenic and visual qualities.

-
- ^{xii} Draft Staff Report prepared by Catalina Hernandez, Page 5.
- ^{xiii} Draft Staff Report prepared by Catalina Hernandez, Page 5, and according to the Mobility Plan 2035, an element of the General plan of the City of Los Angeles.
- ^{xiv} Ibid., Page IV-3.
- ^{xv} Brentwood-Pacific Palisades Community Plan part of the General Plan - City of Los Angeles.
- ^{xvi} Ibid., Page I-2 and 3.
- ^{xvii} Ibid., Page III-7.
- ^{xviii} CEQA (California Public Resources Code §§21000-21189) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§15000-15387).
- ^{xix} CEQA Guidelines §15303(d).
- ^{xx} CEQA §21060.3.
- ^{xxi} *Los Osos Valley Associates v. City of San Luis Obispo*, 30 Cal. App. 4th 1670, 1682 (1994) (finding that the City's choice to drill water wells as a way to conserve water was not an emergency under CEQA because it constituted a choice among many that the City made over a considerable period of time).
- ^{xxii} California Public Resources Code §30253 - Minimization of adverse impacts.
- ^{xxiii} California Public Resources Code §30320 Findings and declarations.
- ^{xxiv} Draft Staff Report prepared by Catalina Hernandez, paragraph I.(C.) Project Costs on Page 2.
- ^{xxv} LADWP Application for Coastal Development Permit Section II.(3) on Page 4.
- ^{xxvi} Draft Staff Report prepared by Catalina Hernandez, Page 7.
- ^{xxvii} Ibid., Page 1.
- ^{xxviii} Ibid., Page 1 states "LADWP installed a temporary Pole-Top Distribution Station" and also "As a temporary measure"; the Application, Page 1, Section 2 states "LADWP proposes to install temporary Pole-Top Distribution Station"
- ^{xxix} Pacific Palisades Community Council Information dated March 19, 2016. Listing both empty lots on Sunset as alternatives. In addition, it listed the corner of Las Lomas/Sunset and Las Lions/Sunset (so. of Sunset) and corner of Las Lomas/Sunset and Las Casas/Sunset (so. of Sunset) as additional alternatives.
- ^{xxx} LADWP press release dated May 1, 2016.
- ^{xxxi} The alternatives identified were: "two were near Paseo Miramar off Via Nichols, one was between the upper Bel-Air Bay Club and Malibu Village and the fourth was the old Bernheimer Gardens site off of Sunset."
- ^{xxxii} California Public Resources Code §30250 Location; existing developed area.
- ^{xxxiii} LADWP press release date February 9, 2016, Page 2.
- ^{xxxiv} Ibid. The General Plans states that "Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway."

EXHIBIT “1”

Exhibit 1

DWP Application for Coastal Development Permit

APPLICATION FOR COASTAL DEVELOPMENT PERMIT
LADWP Temporary Pole Top Distribution Station (PTDS) 198

SECTION I. APPLICANT

1. Name, mailing address, and telephone number of all applicants.

William Herriott, Power System Superintendent
Los Angeles Department of Water and Power
111 North Hope Street, Room # 856
Los Angeles, California 90012
(213) 367-5289

COPY

Note: All applicants for the development must complete Appendix A, the declaration of campaign contributions.

2. Name, mailing address and telephone number of applicant's representatives, if any.

• Wayne Hinkson, Power Engineering Manager, LADWP	(213) 367-8002
• Charles Dunn Power Civil Engineer, LADWP	(213) 367-0189
• Steve Brown, Overhead Distribution Design, LADWP	(213) 367-2756
• Tina Shlm, Deputy City Attorney, LADWP	(213) 367-4500
• Arielle Harris, Downey Brand LLP	(415) 848-4812

SECTION II. PROPOSED DEVELOPMENT

Please answer all questions. Where questions do not apply to your project (for instance, project height for a land division), indicate **Not Applicable** or **N.A.**

1. Project Location and APN.

The Project site is located in the public right-of-way parallel with Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place in Los Angeles. (See L.A. Mun. Code § 82.00.) The PTDS will be constructed within the public utility right-of-way between the sidewalk and the street, adjacent to the property identified by APN No. 4415-023-009. There is no Assessor's Parcel Number for the public right-of-way. An assessor's parcel map showing the Project location and nearby parcels is provided as **Attachment A**. The Thomas Guide page depicting a vicinity map is provided in **Attachment B**. LADWP conducted a land survey for the location, which is provided as **Attachment C**. The Project location is within the *Single Permit Jurisdiction* portion of the Coastal Zone, as shown in **Attachment D**.

FOR OFFICE USE ONLY	RECEIVED _____
APPLICATION NUMBER _____	FILED _____
	FEE _____
	DATE PAID _____

SECTION 1. PROPOSED DEVELOPMENT (Continued)

2. Describe the proposed development in detail.

The Los Angeles Department of Water and Power (LADWP) proposes to install temporary Pole Top Distribution Station (PTDS) No. 123 in the Pacific Palisades community of the City of Los Angeles. The PTDS is needed to alleviate three overloaded 4,160-volt circuits that serve the Palisades community, which include circuits 25-03 & 26-03 serving the western area of the Palisades, and circuit 26-05 serving the eastern area. These circuits connect to Distribution Station 22 (DS-22), which has been operating beyond its designed capacity.

DS-22 was originally constructed in and placed in service in 1937. Over the past eighty years, significant development and population growth in the Pacific Palisades has resulted in DS-22 being at 130 percent of its designed MVA loading. LADWP designs each circuit within a DS to operate at or near 75 percent of loading to protect the system from high peak demands. As a result, the 130 percent MVA loading of DS-22 causes stress on all cables, wires and equipment associated with the main. The PTDS is needed to temporarily relieve the overloading on DS-22 until a new distribution station is constructed and placed in service. Once constructed, the PTDS will reduce outage durations, and improve power quality for the Pacific Palisades community.

The Project consists of the installation of two 65-foot high, 18.4 inch diameter poles, a platform measuring 26' 0" x 7' 6", a 833 KVA transformer measuring 6' 9" tall x 47' wide, cross arms, circuit breakers, switches, and a controller. The Project also requires the installation of an underground vault, conduits, and cables. The underground substructure will be connected to the PTDS via underground cable terminations. Attachment E includes drawings and plans showing how the PTDS will be connected to existing electrical infrastructure and specifically circuit 26-03, which runs along Sunset Boulevard. PTDS installations are found routinely throughout the power system. LADWP currently has 36 PTDS installations in the system overall. As with all other electrical equipment in the LADWP system, each PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational. The PTDS is not a permanent solution in the need to provide adequate power service for the Palisades community.

The options for siting the PTDS are limited by the existing power infrastructure in the Palisades area. The PTDS must be located on a site where it can connect to the existing infrastructure. If the PTDS is located too far away from existing infrastructure, additional poles, as well as overhead and underground infrastructure, including transformers in contact with the existing system, including potential impacts. Undergrounding of a PTDS is not feasible due to the size, complexity, and cost of water intrusion. LADWP conducted considerable public outreach within the Palisades community regarding the location of the PTDS. After completing a feasibility analysis,

for each individual site, receiving considerable public input, LADWP selected the proposed site for the PTDS on Sunset Boulevard and Marquez. Photographs of the Project location are included in Attachment F. Copies of LADWP presentation slides, public news releases, and meeting information concerning the proposed PTDS locations, Councilmember Mike Bonin's statement on the PTDS, and news articles regarding the PTDS are provided in Attachment G.

An example of an existing PTDS within the LADWP system is illustrated below in Figure 1. The PTDS being installed at Marquez and Sunset will be painted to blend in with the surrounding scenery per screening requirements. The paint colors selected for this PTDS are provided in Figure 2.

Figure 1: Example of PTDS in Los Angeles

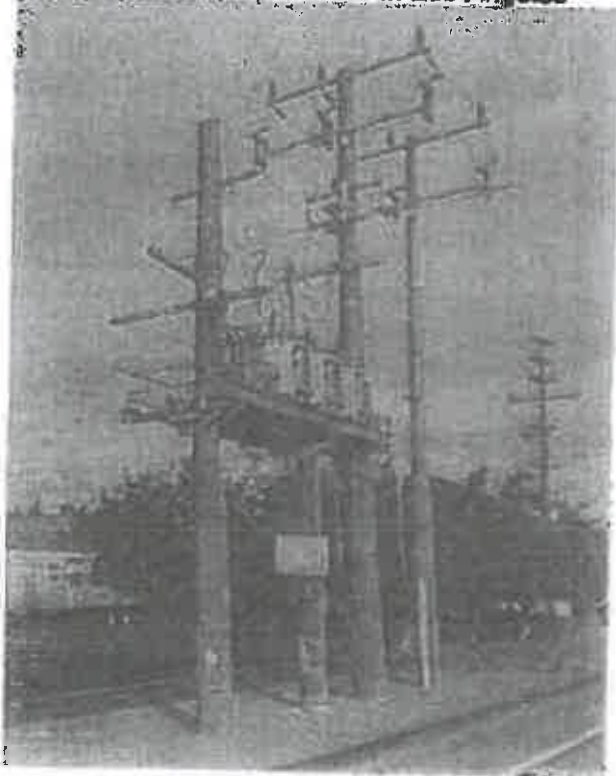
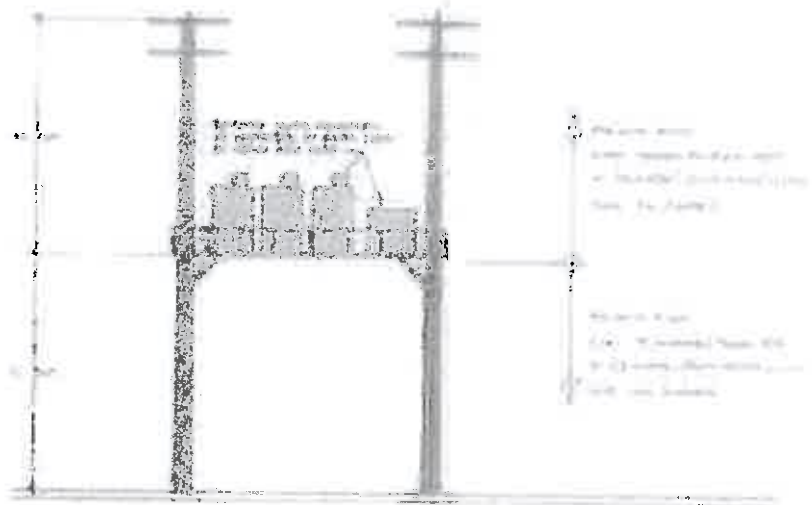


Figure 2: Selected Panel Colors for PIDS



Construction Period

The overhead construction of the PIDS is already underway. LADWP estimates that an additional 1-2 weeks will be required to complete the overhead portions of the PIDS. The underground portions of the PIDS will require additional time with an estimated construction completion date of two months from the date LADWP can resume work on the project. This estimate will vary based on road restriction exemption hours, any obstructions discovered during excavation from the existing underground substructure to the PIDS, and other external influences which arise during construction beyond the control of LADWP.

Notice of CEQA Exemption

LADWP found the proposed project to be exempt from CEQA review and filed a Notice of Exemption on May 20, 2016. A copy of the LADWP Interdepartmental CEQA memorandum, dated May 20, 2016 is provided as Attachment M. The CEQA Notice of Exemption is provided as Attachment I.

- a. If multi-family residential, state: **N/A**
- b. If land division or lot line adjustment, indicate: **N/A**

3. Estimated cost of development (not including cost of land): \$ 276,000.

4. Project height (Maximum height of structure (ft.)):

The height of the PTDS once installed is approximately 61 feet above the ground. The PTDS poles are 70 feet in total length, with a portion of the poles buried in the ground approximately 9 feet. The platform is approximately 20 feet above ground level and the transformers are 6 feet in height.

* above existing (natural) grade	61 feet
* above finished grade	61 feet
* as measured from centerline of frontage road	61 feet

5. Total number of floors in structure: N/A

6. Gross square footage: Platform - 195 sq. ft. surface area
Transformers - 87 sq. ft. surface area

7. Lot area (within property lines) (sq. ft. or acre): 1,126 square feet

8. Is any grading proposed? ☐ Yes ☒ No

Grading, drainage, and erosion control plans must be included with this application, if applicable. In certain areas, an engineering geology report must also be included. N/A

Please list any geologic or other technical reports of which you are aware that apply to this property: N/A

9. Parking: N/A. No parking is being added and no parking is being removed.

10. Are utility extensions for the following needed to serve the project?

The PTDS Project itself is the installation of a utility that is needed to serve the existing community. The PTDS will be installed above-ground as it is infeasible to place this type of equipment underground

a) water	b) gas	c) sewer	d) electric	e) telephone
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes
<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No

Will electric or telephone extensions be above-ground? ☒ Yes ☐ No

1. Does project include removal of trees or other vegetation? ☒ Yes ☐ No
(If yes, indicate number, type and size of trees)

Removal of the PTDS requires the removal of four nonnative trees of
approximately 2.5-3.0 feet in height. No other vegetation will be removed.

SECTION 4. ADDITIONAL INFORMATION

The relationship of the development to the riparian side is as below stated for consideration.
Attach additional sheets if necessary.

1. Existing use of property

The location of the PTDS is within the existing right-of-way. The site does not
have any other structures or improvements. The PTDS will be installed adjacent to
the sidewalk and will not require any removal of concrete or asphalt.

- a. Are there existing structures on the property? ☐ Yes ☒ No
b. Will any existing structures be demolished? ☐ Yes ☒ No
c. Will any existing structures be removed? ☐ Yes ☒ No

2. Is the proposed development to be covered by a Development Agreement? ☐ Yes ☒ No

3. Has any application for development on this site including
any subdivision been submitted previously to the California
Coastal Zone Conservation Commission or the Coastal
Commission? ☐ Yes ☒ No

4. Coastal Access

- a. Is the distance between the last public road and the sea (including
logjams, dikes, and other barriers of water) less than 100 feet?
☐ Yes ☒ No
- b. If yes, is public access to the shoreline and along the coast currently
available on the site or near the site? ☒ Yes
- c. Will the project have an effect on public access to or along the shoreline,
either directly or indirectly via removing parking used for access to the
beach? ☒ No

5. Does the development involve diking, filling, draining, dredging or placing structures in open coastal waters, wetlands, estuaries, or lakes?

a) diking	b) filling	c) dredging	d) placement of structures
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes
<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No

6. Will the development extend onto or adjoin any beach, tidelands, submerged lands or public trust lands? ☐ Yes ☒ No

7. (a) Will the development protect existing lower-cost visitor and recreational facilities? ☐ Yes ☒ No

- (b) Will the development provide public or private recreational opportunities? ☐ Yes ☒ No

8. Will the proposed development convert land currently or previously used for agriculture to another use? ☐ Yes ☒ No

9. Is the proposed development in or near:

a. Sensitive habitat areas (Biological survey may be required) ☐ Yes ☒ No

b. Areas of state or federally listed rare, threatened, or endangered species ☐ Yes ☒ No

c. 100-year floodplain (Hydrologic mapping may be required) ☐ Yes ☒ No

d. Park or recreation area ☐ Yes ☒ No

10. Is the proposed development visible from:

a. State Highway 1 or other scenic route ☒ Yes ☐ No

b. Park, beach, or recreation area ☐ Yes ☒ No

c. Harbor area ☐ Yes ☒ No

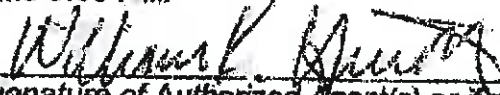
Explanation: The PTDS will be located on Sunset Boulevard, which is designated by the City as a scenic highway in the City of Los Angeles General Transportation Plan.

and addresses of all other parties known to the applicant to be interested in the proposed development (such as persons expressing interest at a local government hearing, etc.)

4. A vicinity or location map (copy of Thomas Bros. or other good map or USGS quad map) with the project site clearly marked.
5. Copies of plans drawn to scale, including (for application):
 - site plans
 - floor plans
 - parking overlays
 - parking, drainage, and storm control plans
 - landscape plans
 - septic system plansTraces to be removed must be marked on the site plan. In addition, a reduced site plan, 8 1/2" x 11" in size, must be submitted. Reduced copies of complete project plans will be required for larger projects. NOTE: See instruction page for number of sets of plans required.
6. Where septic systems are proposed, evidence of County approval or Regional Water Quality Control Board approval. Where water wells are proposed, evidence of County review and approval.
7. A copy of any Draft or Final Negative Declaration, Environmental Impact Report (EIR) or Environmental Impact Statement (EIS) prepared for the project. If available, comments of all reviewing agencies and responses to comments must be included.
8. Verification of all other permits, permissions or approvals applied for or granted by public agencies such as:
 - Department of Fish and Game
 - State Lands Commission
 - Army Corps of Engineers
 - U.S. Coast GuardFor projects such as seawalls located on or near state islands or public trust lands, the Coastal Commission must have a written determination from the State Lands Commission whether the project would encroach onto such lands and, if so, whether the State Lands Commission has approved such encroachment. See memo to "Applicants for shoreline development" dated December 13, 1983.
9. For development on a bluff face, bluff top, or in any area of high geologic risk, a comprehensive, site-specific geology and soils report (including maps) prepared in accordance with the Coastal Commission's Interpretation Guidelines. Copies of the guidelines are available from the District Office.

SECTION VII. CERTIFICATION

1. I hereby certify that I, or my authorized representative, have completed and posted or will post the **Notice of Pending Permit** card in a conspicuous place on the property within three days of submitting the application to the City Engineer.
2. I hereby certify that I have read this completed application and that, to the best of my knowledge, the information in this application and all attached appendices and exhibits is complete and correct. I understand that the failure to provide any requested information or any misstatements submitted in support of the application shall be grounds for either refusing to accept this application, for denying the permit, for suspending or revoking a permit issued on the basis of such misrepresentations, or for seeking of such further relief as may seem proper to the City Engineer.
3. I hereby authorize representatives of the City Engineer to conduct site inspections on my property. Unless arranged otherwise, these site inspections shall take place between the hours of 8:00 A.M. and 5:00 P.M.



Signature of Authorized Agent(s) or if no agent,
signature of Applicant

NOTE: IF SIGNED ABOVE BY AGENT, APPLICANT MUST SIGN BELOW.

SECTION VIII. AUTHORIZATION OF AGENT

I hereby authorize _____
to act as my representative and to bind me in all matters concerning this application.

Signature of Applicant(s)
(Only the applicant(s) may sign here to authorize
an agent)

APPLICATION FOR COASTAL DEVELOPMENT PERMIT

APPENDIX A

DECLARATION OF CAMPAIGN CONTRIBUTIONS

Government Code Section 84.50 prohibits any Commissioner from voting on a project if he or she has received campaign contributions in excess of \$250 within the past year from project proponents or applicants, their agents, employees or family, or any person with a financial interest in the project.

In the event of such contributions, a Commissioner must disclose the source of the contribution before voting on the project.

Each applicant must declare below whether any such contributions have been made to any of the listed Commissioners or Alternates (see last page):

CHECK ONE



The applicant, their agents, employees, family, and/or any person with a financial interest in the project have not contributed over \$250 to any Commissioner(s) or Alternates within the past year.



The applicant, their agents, employees, family, and/or any person with a financial interest in the project have contributed over \$250 to the Commissioner(s) or Alternates listed below within the past year:

Commissioner or Alternate

N/A

Commissioner or Alternate

N/A

Commissioner or Alternate

N/A

William K. Herrick
Signature of Applicant or Authorized Agent

9/2/2016
Date

Please type or print your name:

William K. Herrick

**APPENDIX B
LOCAL AGENCY REVIEW FORM**

SECTION A (TO BE COMPLETED BY APPLICANT)

Applicant: William Henriott, Power System Superintendent, LADWP

Project Description: Construction of temporary pole-top distributing station (PTDS)

Location: The Project site is located in the public right-of-way adjacent to Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place in Los Angeles

Assessor's Parcel Number: There is no Assessor's Parcel Number for the public right-of-way. The PTDS will be constructed within the public utility right-of-way between the sidewalk and the street, parallel with Sunset Boulevard and adjacent to the property identified by APN No. 4415-023-009

SECTION B (TO BE COMPLETED BY LOCAL PLANNING OR BUILDING INSPECTION DEPARTMENT)

Zoning Designation _____ du/ac

General or Community Plan Designation _____ du/ac

Local Discretionary Approvals

- ☐ Proposed development meets all zoning requirements and needs no local permits other than building permits.
- ☐ Proposed development needs local discretionary approvals noted below.

Needed Received

- | | | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Design/Architectural review |
| <input type="checkbox"/> | <input type="checkbox"/> | Variance for _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Rezone from _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Tentative Subdivision/Parcel Map No. _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Grading/Land Development Permit No. _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Planned Residential/Commercial Development Approval _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Site Plan Review _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Condominium Conversion Permit _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Conditional, Special, or Major Use Permit No. _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Other _____ |

CEQA Status

- ☐ Categorically Exempt Class _____ Item _____
- ☐ Negative Declaration Granted (Date) _____
- ☐ Environmental Impact Report Required, Final Report Certified (Date) _____
- ☐ Other _____

Prepared for the
City/County of _____
Date _____

by _____
Title _____

APPENDIX C

APPENDIX C

LIST OF PROPERTY OWNERS AND OCCUPANTS WITHIN 100 FEET AND THEREAFTER
INVESTIGATING AGENCY TO BE FILLED AS APPROPRIATE

SUNSET/MARQUEZ

**Chu Family Living Trust
16991 W. Sunset Blvd.
Pacific Palisades, CA 90272**

**Richard C. Wahlgren
16975 W. Sunset Blvd.
Pacific Palisades, CA 90272**

**David Noriani
16969 W. Sunset Blvd.
Pacific Palisades, CA 90272**

**Palisades Bay Club
1560 Nelson Ave.
Manhattan Beach, CA 90266**

**Walter A. Griesser
Registered Agent
Palisades Bay Club
1560 Nelson Avenue
Manhattan Beach, CA 90266**

APPENDIX D
(Former Appendix)
DECLARATION OF PORTING

**APPENDIX D
(Permit Application)
DECLARATION OF POSTING**

Prior to or at the time the application is submitted for filing, the applicant must post, at a conspicuous place, easily read by the public and as close as possible to the site of the proposed development, notice that an application for the proposed development has been submitted to the City Engineer. Such notice shall contain a general description of the nature of the proposed development. The City Engineer furnishes the applicant with a standardized form to be used for such posting. If the applicant fails to post the completed notice form and sign the Declaration of Posting, the city staff shall refuse to file the application. Please sign and date this Declaration of Posting form when the site is posted; it serves as proof of posting. It should be returned to our office with the application.

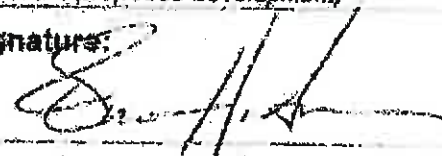
Pursuant to the requirements of California Administrative Code Section 13054(b), I hereby certify that on September 2, 2016, I or my authorized representative posted the **Notice of Pending Permit** for application to obtain a coastal development permit for the development of the Los Angeles Department of Water and Power (LADWP) Temporary Pole Top Distribution Station (PTDS) 198 to service the Pacific Palisades.

Located at: Within the public right-of-way along Sunset Boulevard at the south-west corner of the intersection of Marquez Place and Sunset Boulevard

The public notice was posted at: At the Project location described above. A public notice was taped to one of the poles at eye-height level, facing out.

(a conspicuous place, easily seen by the public and as close as possible to the site of the proposed development)

Signature:



Date: September 2, 2016

NOTE: Your application cannot be processed until this **Declaration of Posting** is signed and returned to this office.

FOR OFFICE USE ONLY

PERMIT NUMBER
RECEIVED
DECLARATION COMPLETE

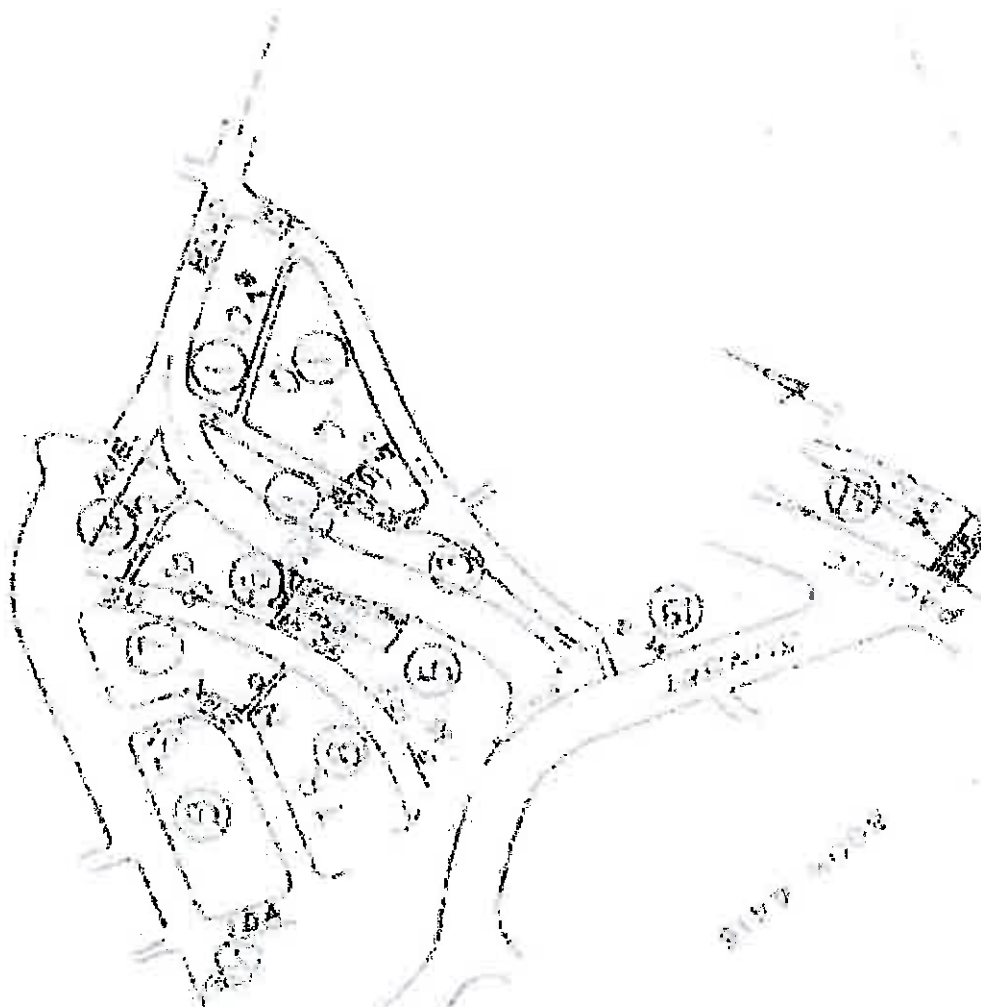
ATTACHMENT A
ASSESSOR'S PARCEL MAP AND ASSESSOR'S PARCEL INDEX MAP

[illegible]

TRACT NO. 26721
LA. B. 692-40-50

AGENTS OF THE
COMPANY OF THE
SOUTH PACIFIC

THE UNIVERSITY OF CHICAGO

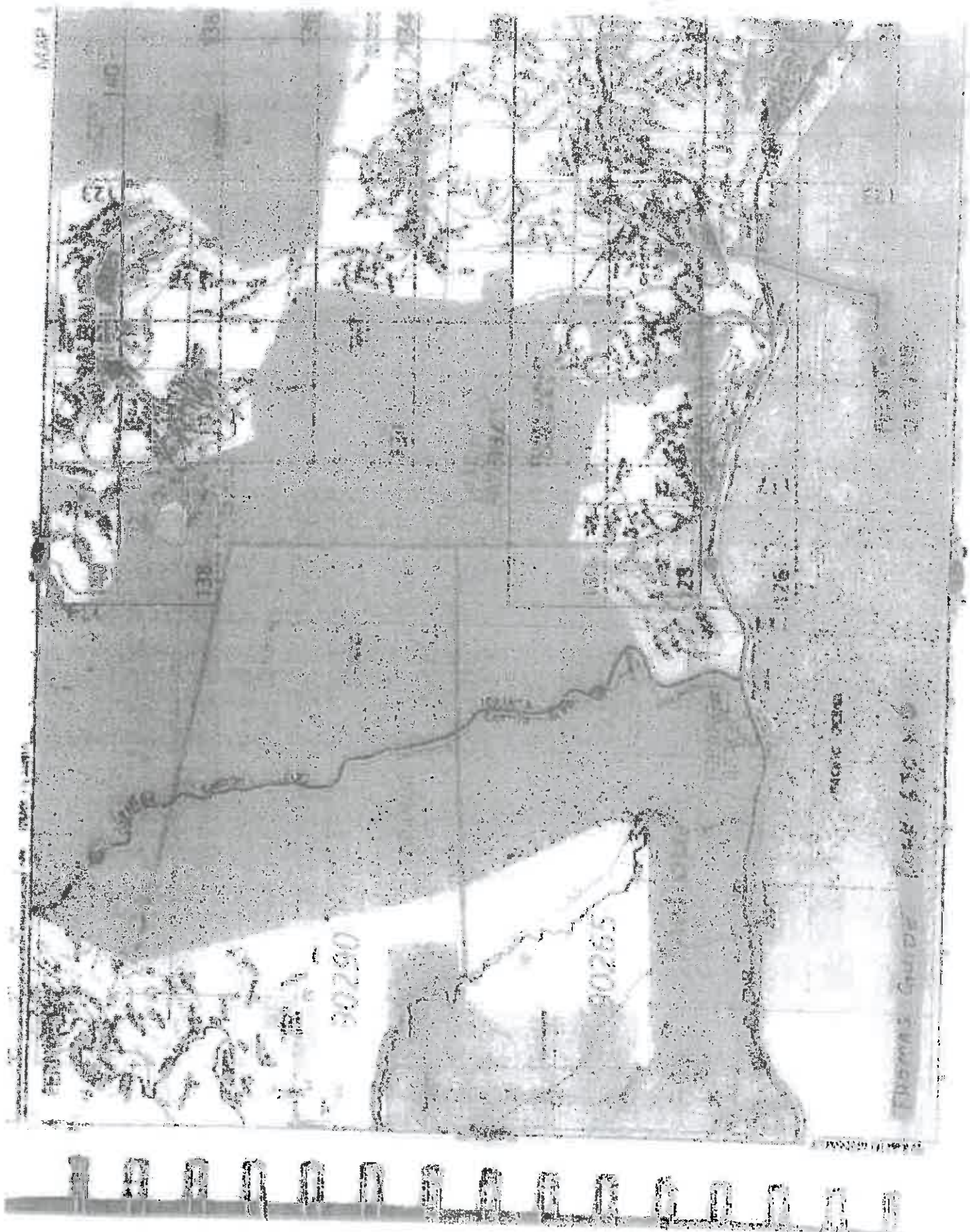


2887

[illegible]

1991

ATTACHMENT B
THOMAS GUIDE PAGE VICINITY MAP



ATTACHMENT C

LAND SURVEY

NO. 47-51-1572-40 (SERIAL 1) 01/28/50

SOURCE

DATE

J. AMT

SUNSET BLVD E/O MARQUEZ PLACE

- (PHONE #) PAUL POLK, S/S SUPERVISOR

PIC0132

10-250

QTD 51-1572140

INDEX 100

CHARGE 100-120

TO 630 PM

OSAS-10

FURNACE

2000

WILLIAMSON

NOTE: SERIA 30728
Changed from 100-120

NOTE: (A) TRUCK #1 26721 - 10-29-50

(A) TRUCK #8 76710 - 10-30

TRUCK #1 (1949) - 10-30-50

ASPHALT AND WPS 10

ALL THE ABOVE SERIALS 217707 01/28

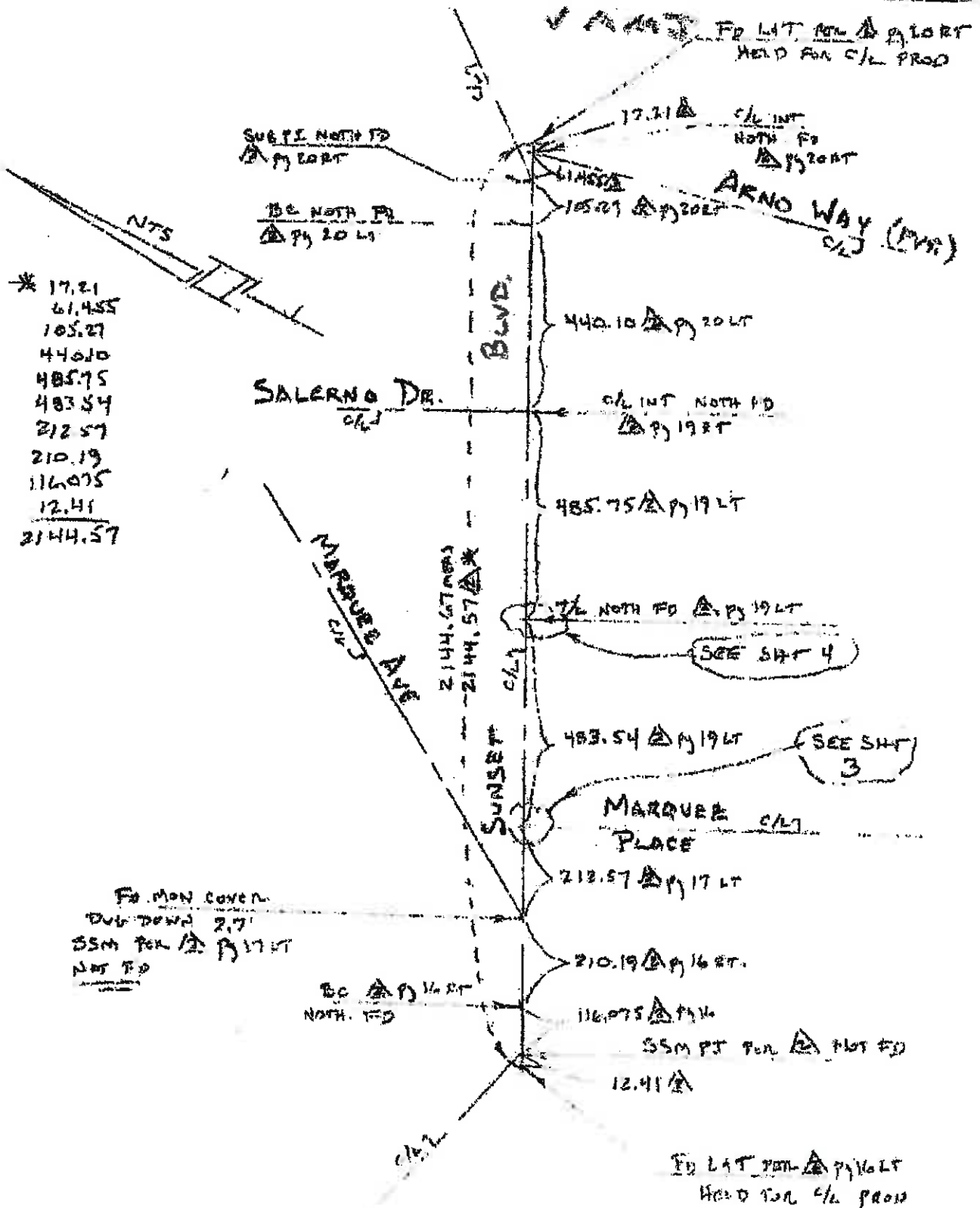
47-51-1572-40 (SERIAL 1) 01/28/50

SURVEY OF SUNSET BL E/O MARQUE PL / LEBL / P160158 / 2 of 6
STREET C/L CONTROL FACILITY NO. 1001 RFS/PB 2 PAGE

SURVEYOR FVJ1

DATE 03 AUG 16

Department of Water and Power
 LAND SURVEYS
 Los Angeles



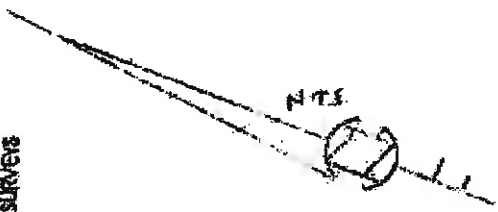
SURVEY OF SUNSET BL E/O MARQUEZ PL LA 44-158 ^{Sheet} 4 ^a 6
SUNSET BL / TRACT LINE INT ^{FACILITY/NO} 1 ^{R/S/FB} 4 ^{PAGE}

SURVEYOR F. J. J.

DATE 08-26-16

TO LOT C/L 1/2
 PROD E/O
 ARNO WAY

Los Angeles Department of Water and Power
 LAND SURVEY

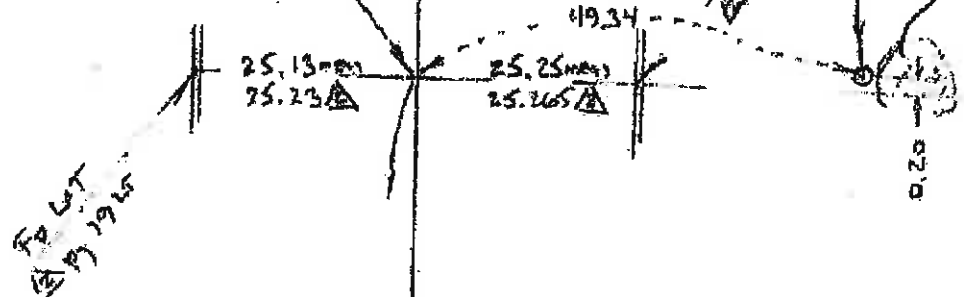


NORTHING PD
 NOTHING SET
 @ INT. LOTS
 & C/L SUNSET BL
 P 19 LT

BLVD

F 2" 1P # TALL
 RCE 1216
 IN BASE OF
 LARGE GUM TREE
 FOR P 19 LT

GUM TREE



TRACT
 LINE
 (NO SURVEY)

SUNSET

483.60 mms
 483.54 P 19 LT

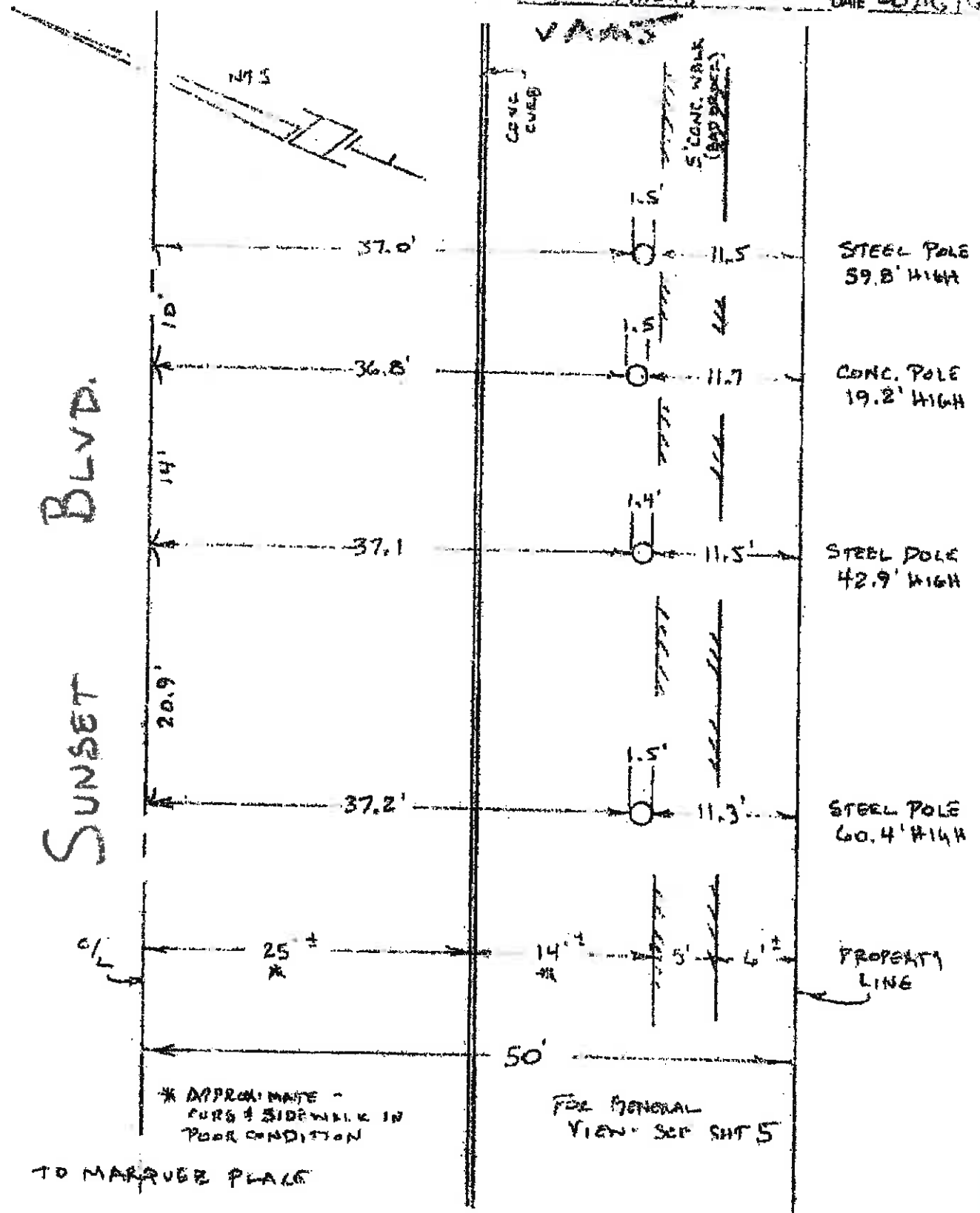
TO SH 3
 C/L INT
 MARQUEZ PL



SURVEY OF SUNSET BL E/O MARQUEE PL / LEV. 1 / P160158 ^{Sheet} 6 of 6
POLE LOCATION DETAILS ^{FACILITY/NO} 1 ^{RFS/FB} 1 ^{PAGE} 6

SURVEYOR F. J. JAMES

DATE 08/06/16



ATTACHMENT D
MAP SHOWING SINGLE JURISDICTION BOUNDARY



ATTACHMENT E
DRAWINGS AND PLANS FOR PIDS 105

Los Angeles Department of Water and Power	POLE TOP DISTRIBUTION STATION Aluminum Three Pole Platform Construction		OH
Overhead Power Distribution Construction Standards	Material List: M633-16 thru -18		

MINIMUM 48" POLE WITH MINIMUM PLATFORM HEIGHT

34.5kV BUS

6'

4.8kV

THIS DISTANCE IS DETERMINED FROM THE TRANSFORMER HEIGHT PLUS THE MAXIMUM 34.5kV JUMPER LENGTH

TRANSFORMER PLATFORM

A PREFERRED MINIMUM DISTANCE OF 12" FROM GROUND LEVEL TO CENTER HOLE OF RACK FOR HEIGHT MORE THAN 18" ONLY WHEN CONSTRUCTION CLEARANCES REQUIRE MAY BE MOVED TO A MAXIMUM OF 21" IF HEIGHT MORE THAN 21' IS NEEDED APPROVAL BY CONSTRUCTION STANDARDS IS REQUIRED.

TOP OF POLE

8" CROSS ARM CENTER HOLE

30"

18" SWITCH ARM BRACKET

6"

2'-5 1/4" FUSE UNIT

6"

34.5kV BUS

12" JUMPER MAX. LENGTH

TRANSFORMER HEIGHT

TRANSFORMER PLATFORM

1" PHONE (GEN.) COMPANY

12" SWITCH HANDLE

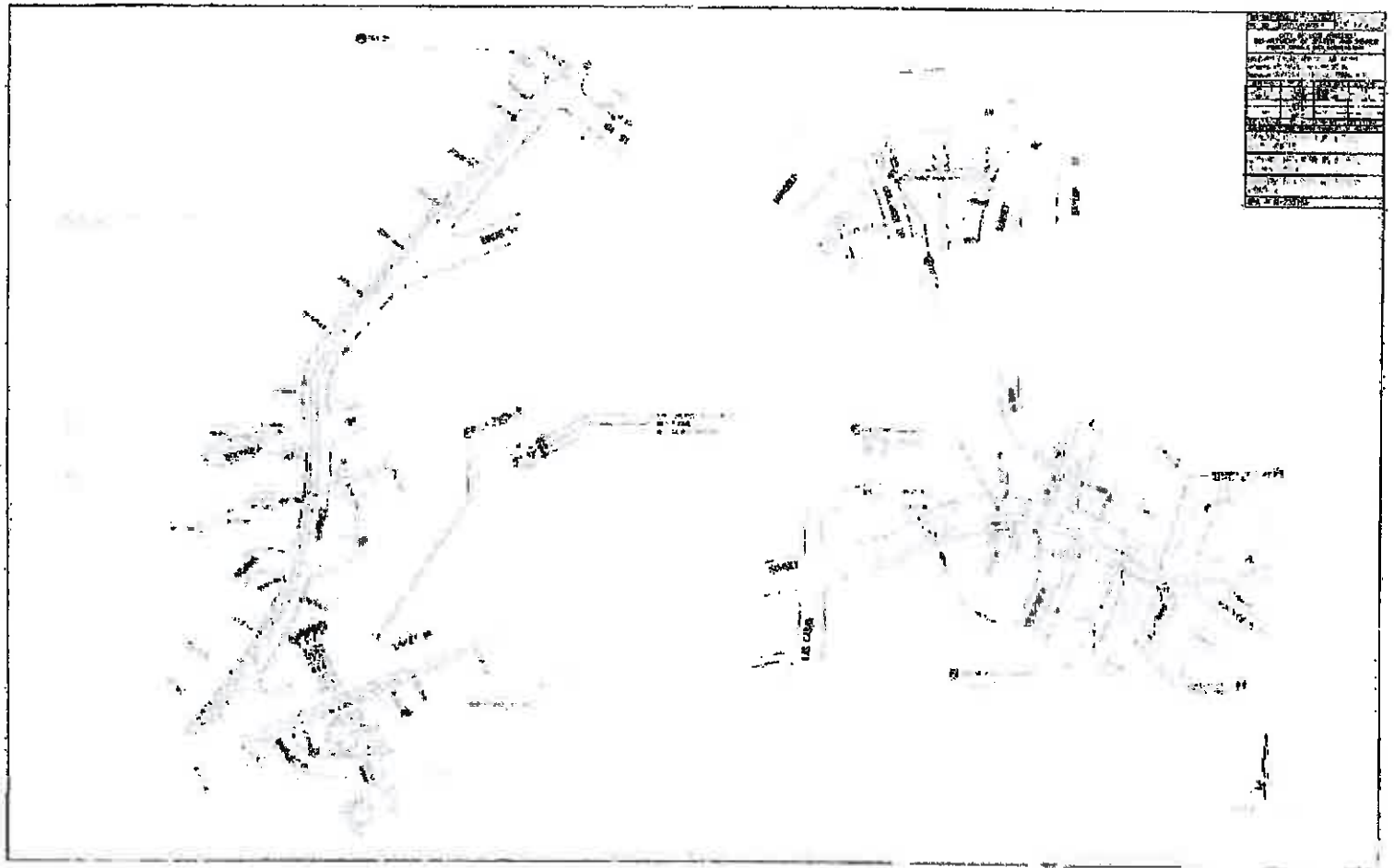
8'-6" (MIN.)

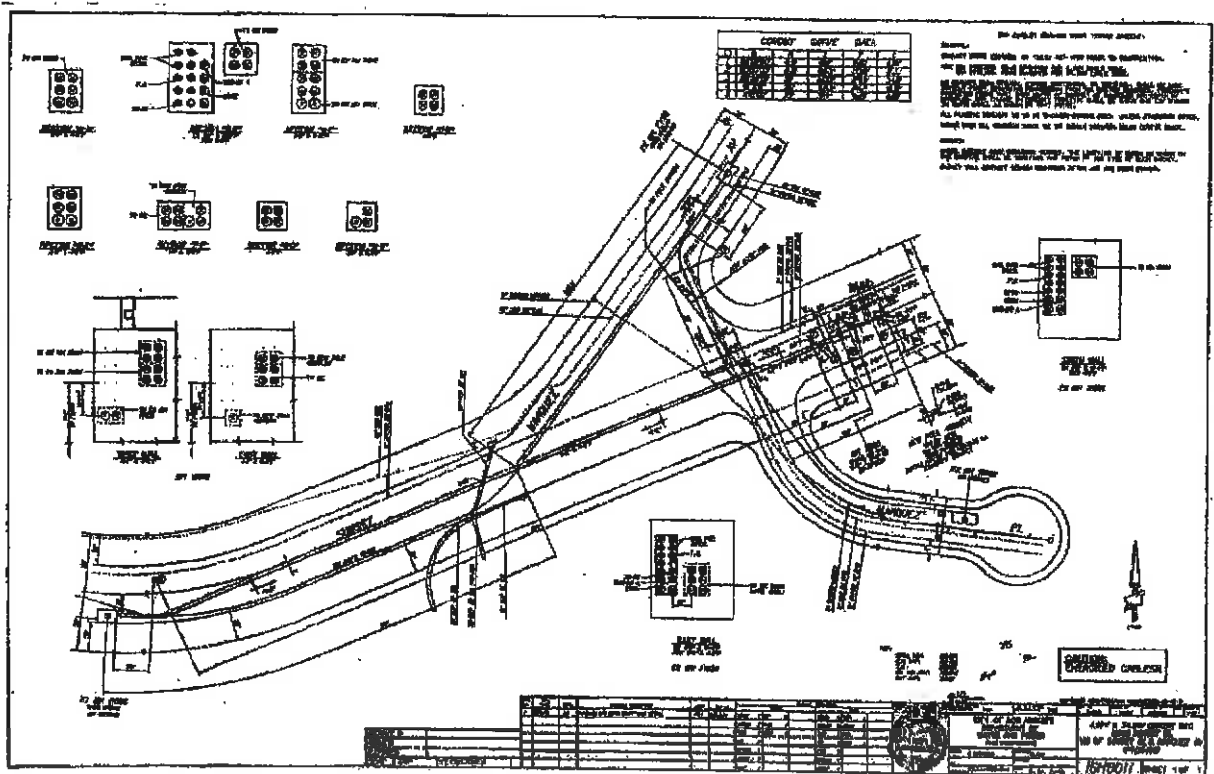
GROUND LINE

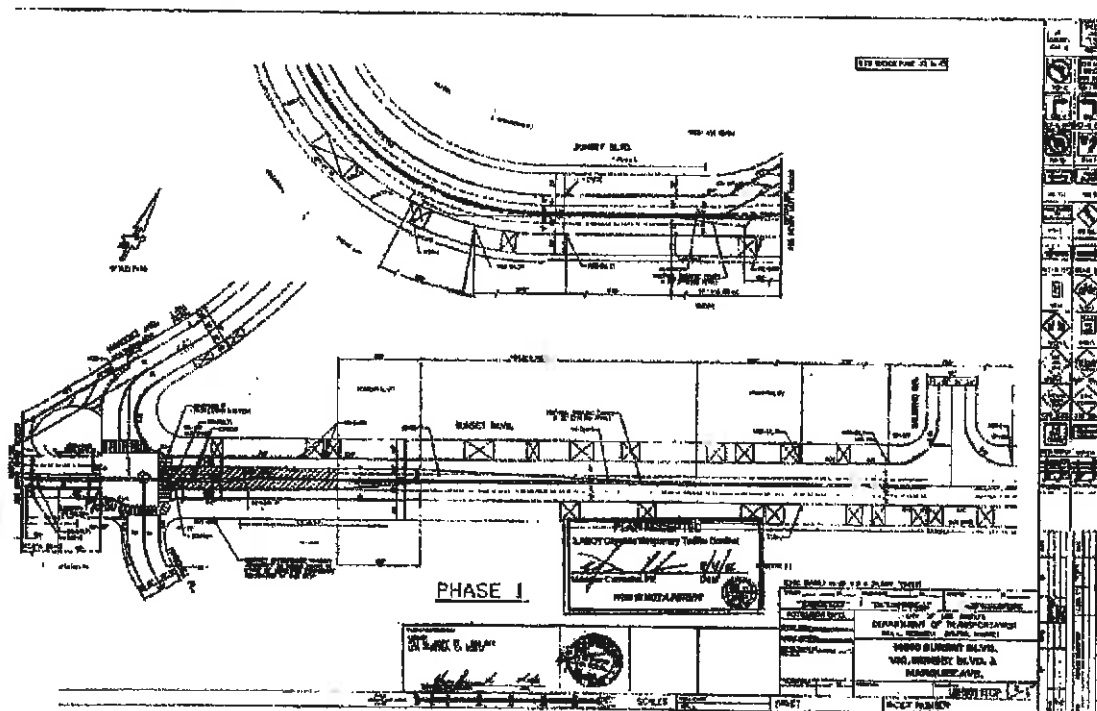
M633-003

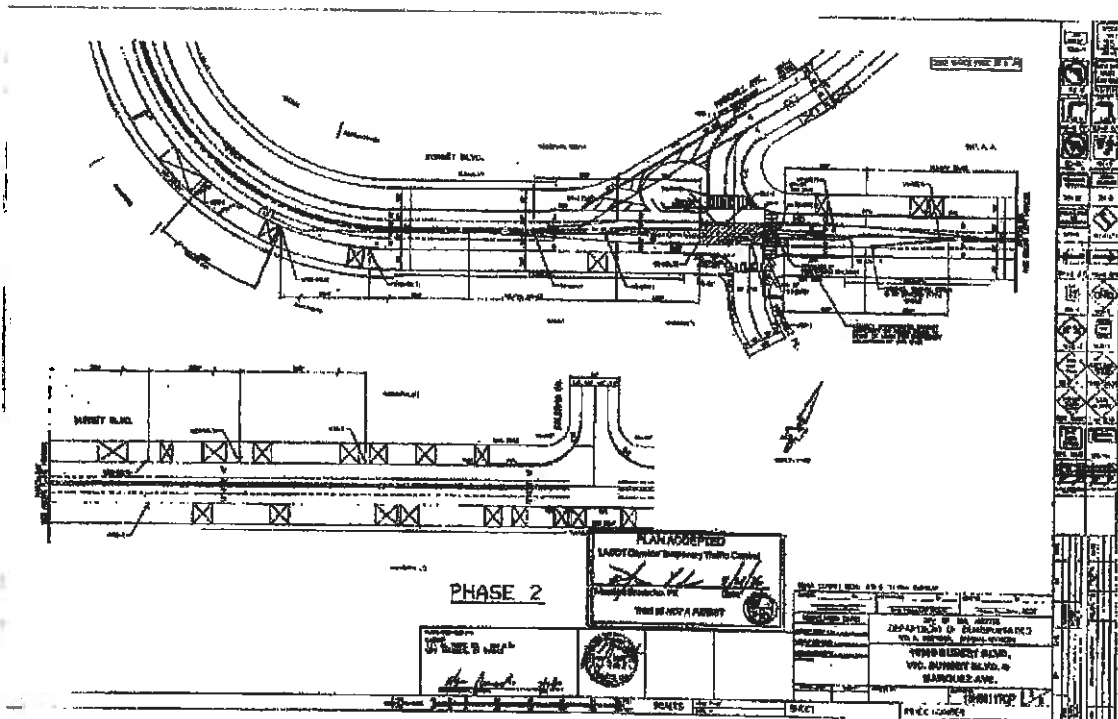
NOTE:
Pole top D.S. includes platform transformers, automatic recloser (AR), 34.5kV and 4.8kV switches, 34.5kV fuse holder and fuses, surge protection, grounding and metering. Poles are not included see OH page C403-30 for poles.

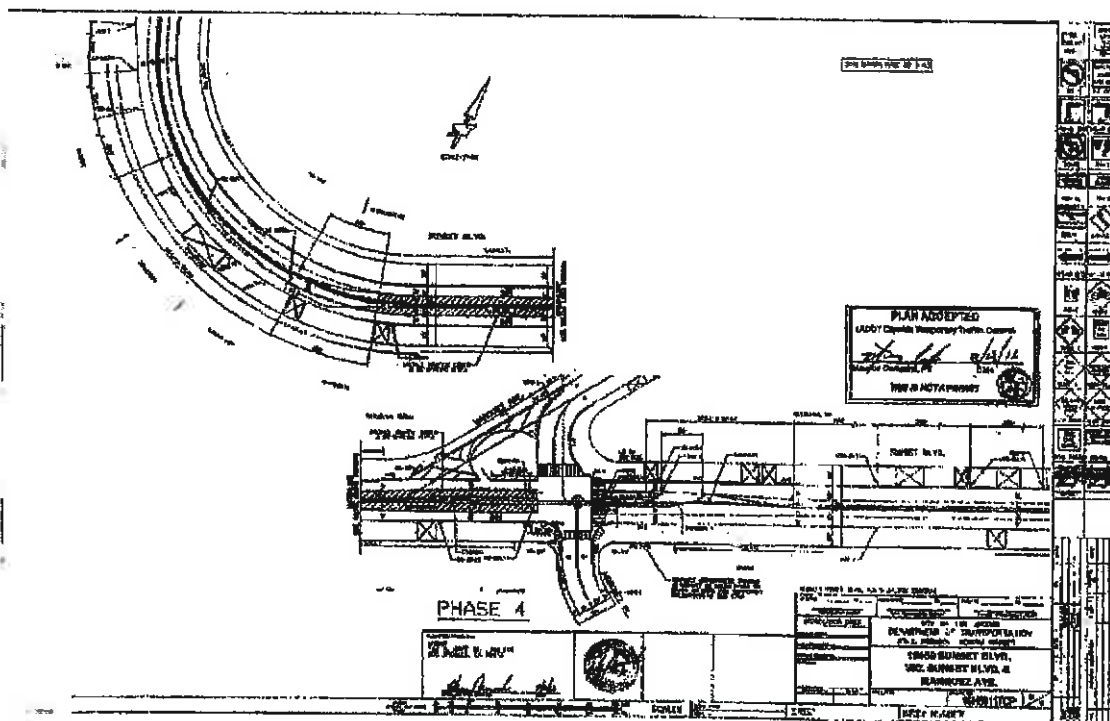
C633-16	Issued Date: 02/02/12	Approved by		C633-16
	Revised Date:	<i>E. G. G. H. S. A.</i> E.E. LIC. E-12446	<i>Jew</i>	

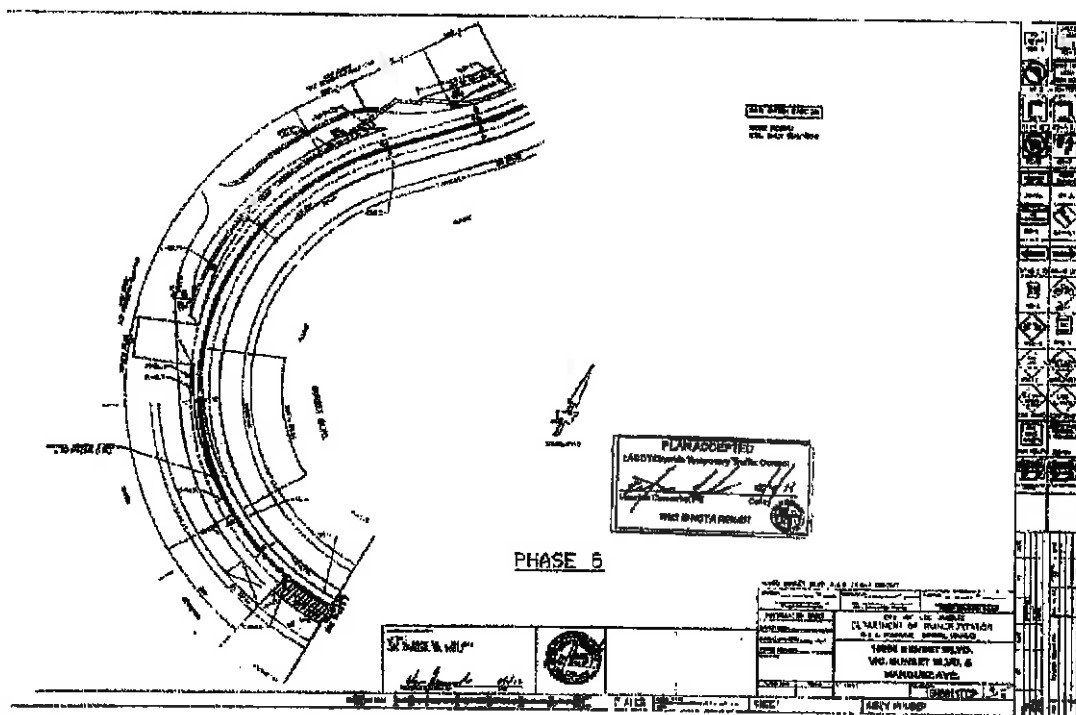


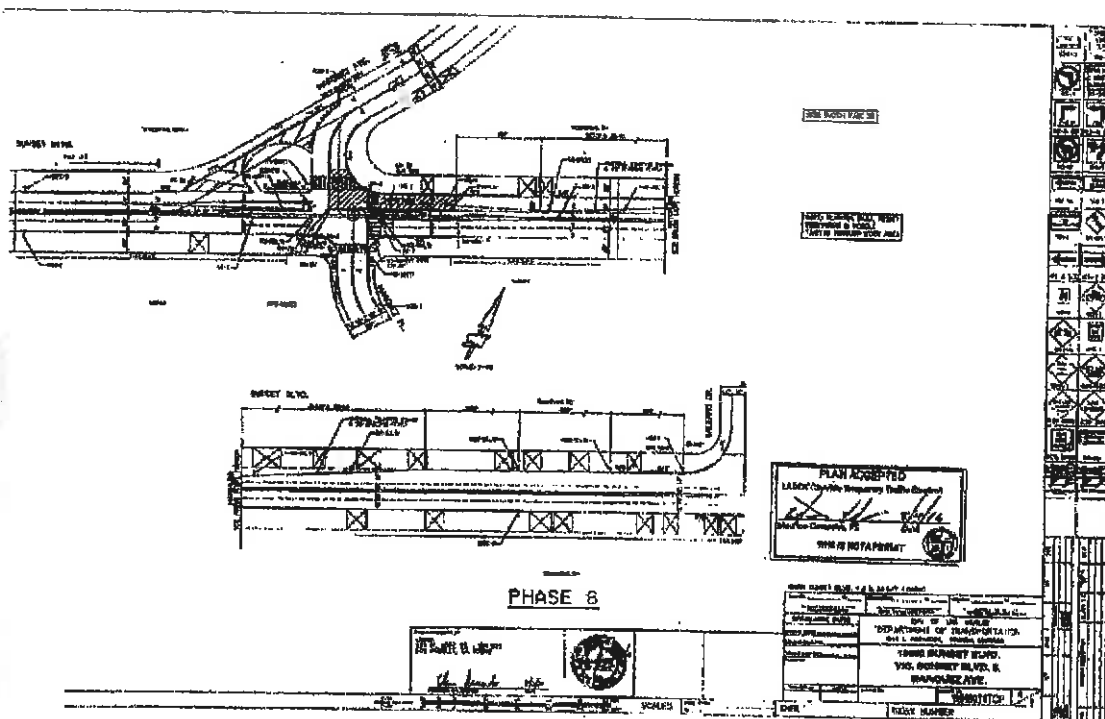




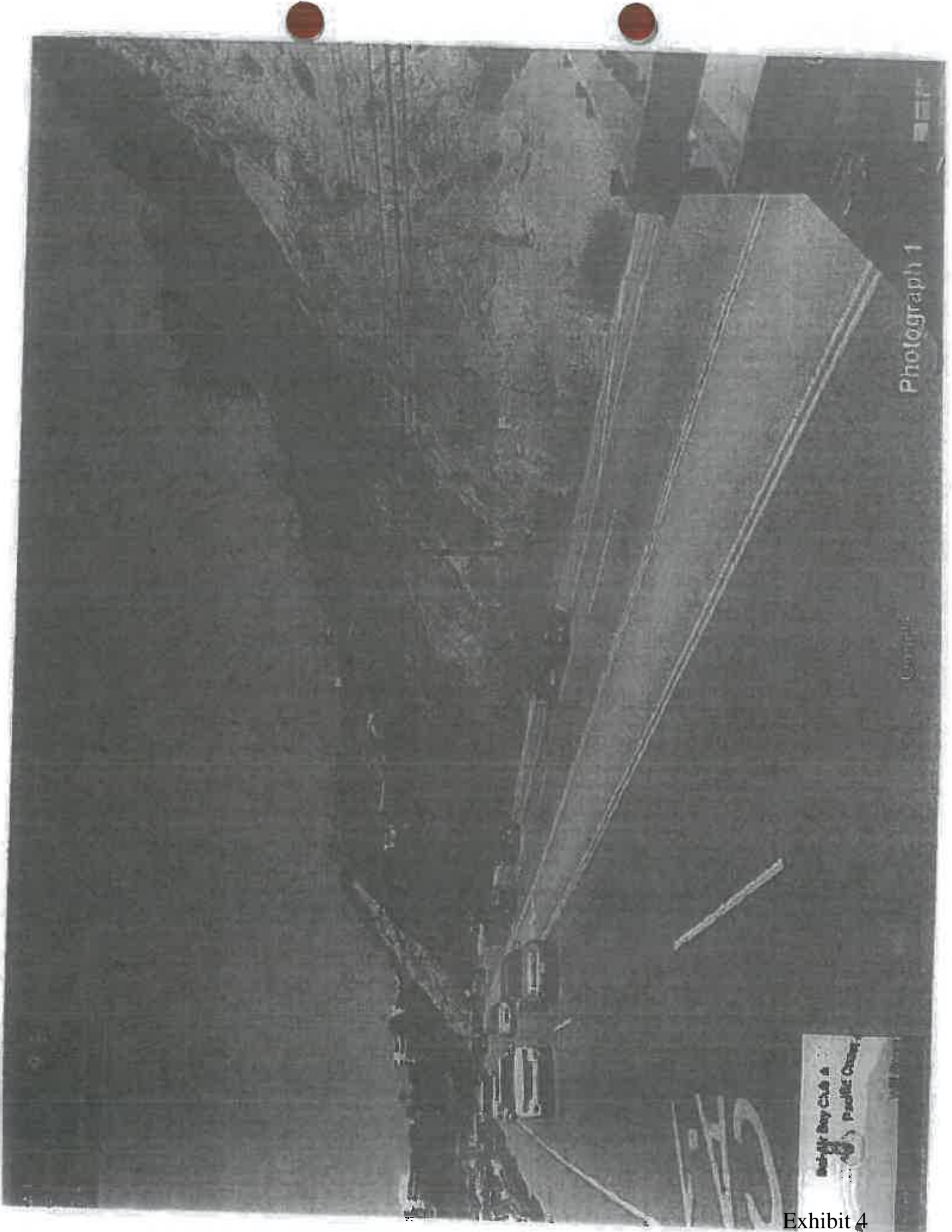








- Photo 1: Photo from Pacific Coast Highway, approximately 90 degrees from the site. The pole tops are not visible in any way. Photo is looking north up Pacific Coast Highway.
- Photo 2: Photo from Pacific Coast Highway, approximately south-west from the site. The pole tops are not visible in any way. Photo is looking north up Pacific Coast Highway.
- Photo 3: Photo from Pacific Coast Highway, approximately south from the site. The pole tops are not visible in any way. Photo is looking north up Pacific Coast Highway.
- Photo 4: Photo from Pacific Coast Highway, approximately east from the site. The pole tops are not visible in any way. Photo is looking south down Pacific Coast Highway.
- Photo 5: 2015 photo from Google Maps showing the location. No ocean view is visible. Photo is looking east on Sunset Boulevard, away from the Marquez intersection. The location is adjacent to a vacant lot with visible other structures, including a bus stop and power lines.
- Photo 6: Current photo of site from Sunset Boulevard, looking directly towards the ocean. Structures are installed. No ocean view is visible. The painting of the poles is visible in this photograph, of the two colors: light blue and light brown.
- Photo 7: 2016 photo from Google Maps showing the location. No ocean view is visible. Photo is looking east from the middle of the Sunset Boulevard and Marquez intersection. Structures are not installed.
- Photo 8: Current photo of the site with the structures installed. Photo is from the public sidewalk, looking east on Sunset Boulevard. The painting of the structures is visible.
- Photo 9: Current photo of the site with the structures installed. Photo is from the cul-de-sac Marquez Place, looking towards Sunset Boulevard. The painting of the structures is visible.
- Photo 10: Current photo of the site with the structures installed. Photo is looking west on Sunset Boulevard, towards the Sunset Boulevard and Marquez intersection. The structures are barely visible.
- Photo 11: Current photo of the site with the structures installed. Photo is from across the street on Sunset Boulevard, looking at the ocean. No ocean view is visible.



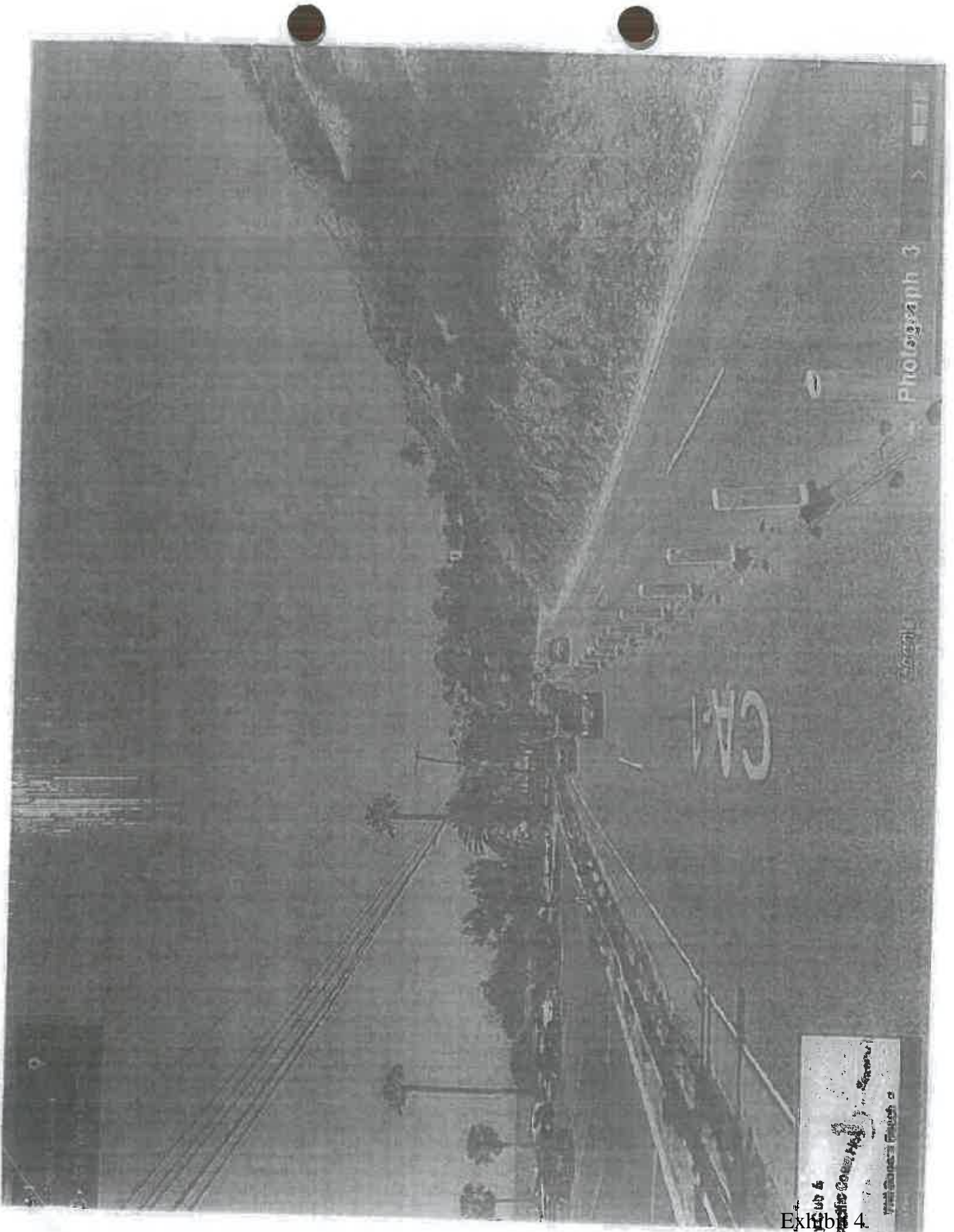
Photograph 1

North Bay Club &
Pavilion Center



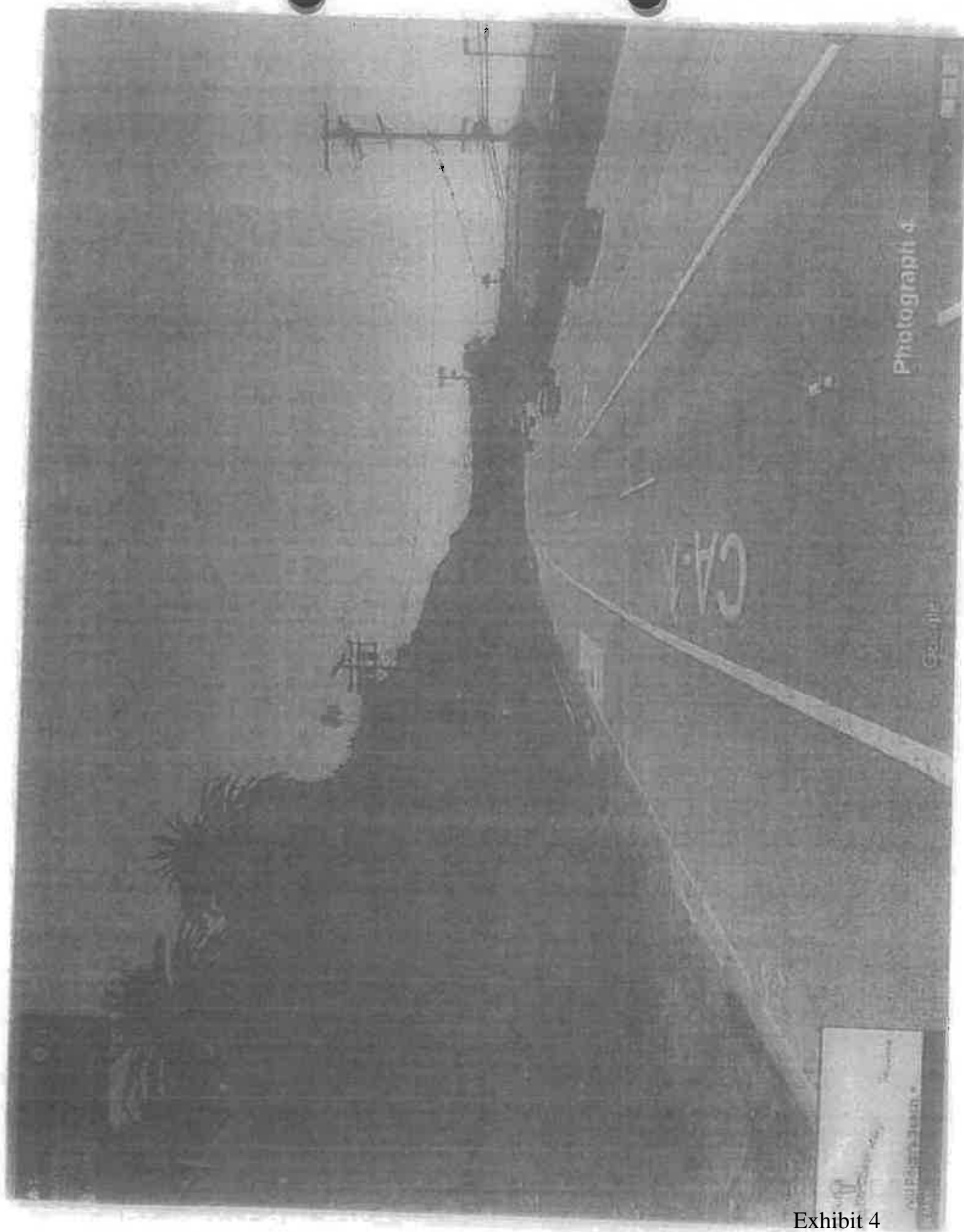
Photograph 2

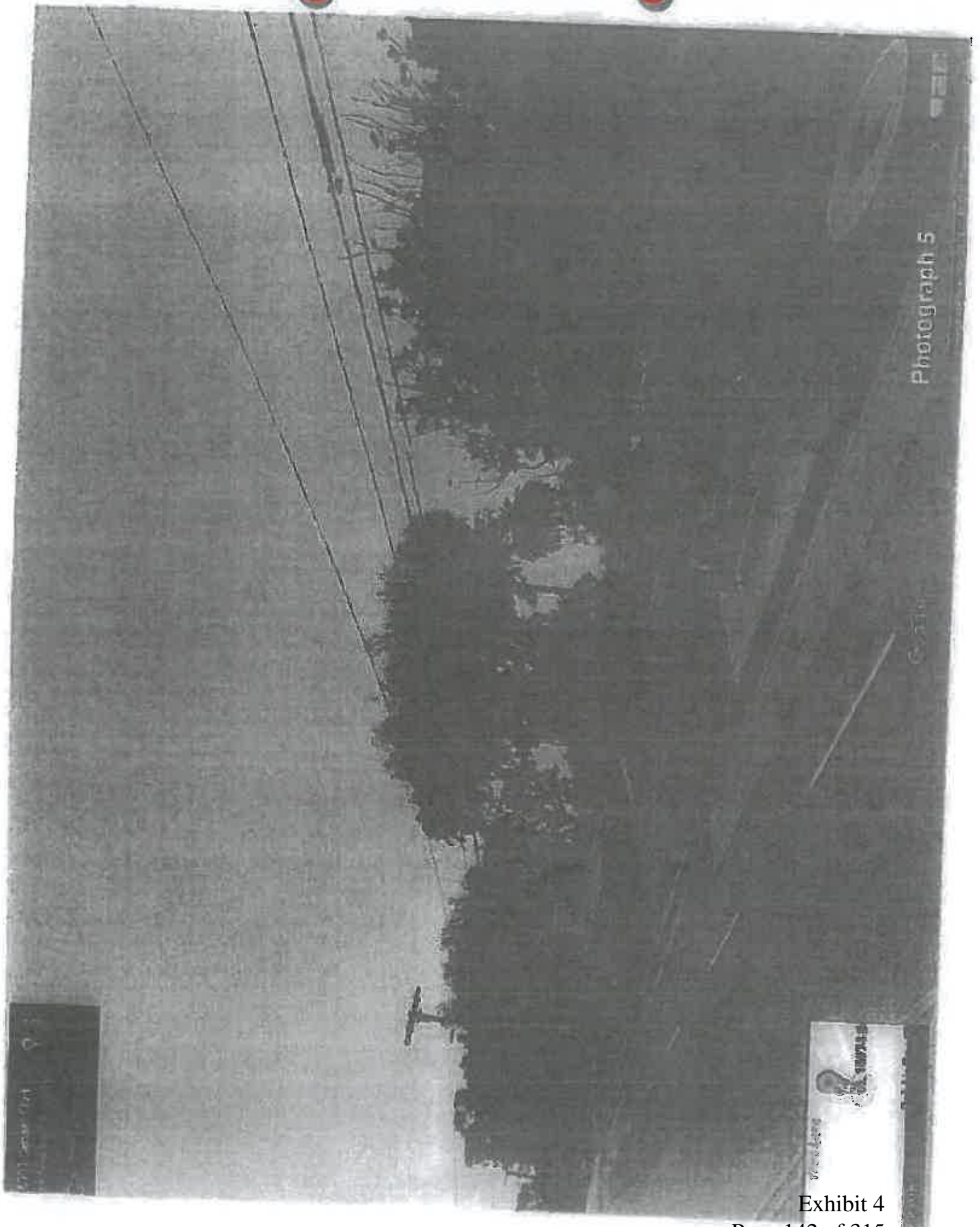
Google



Photograph 3

Exhibit 4





Photograph 5

Exhibit 4

Page 142 of 315

Photograph 8





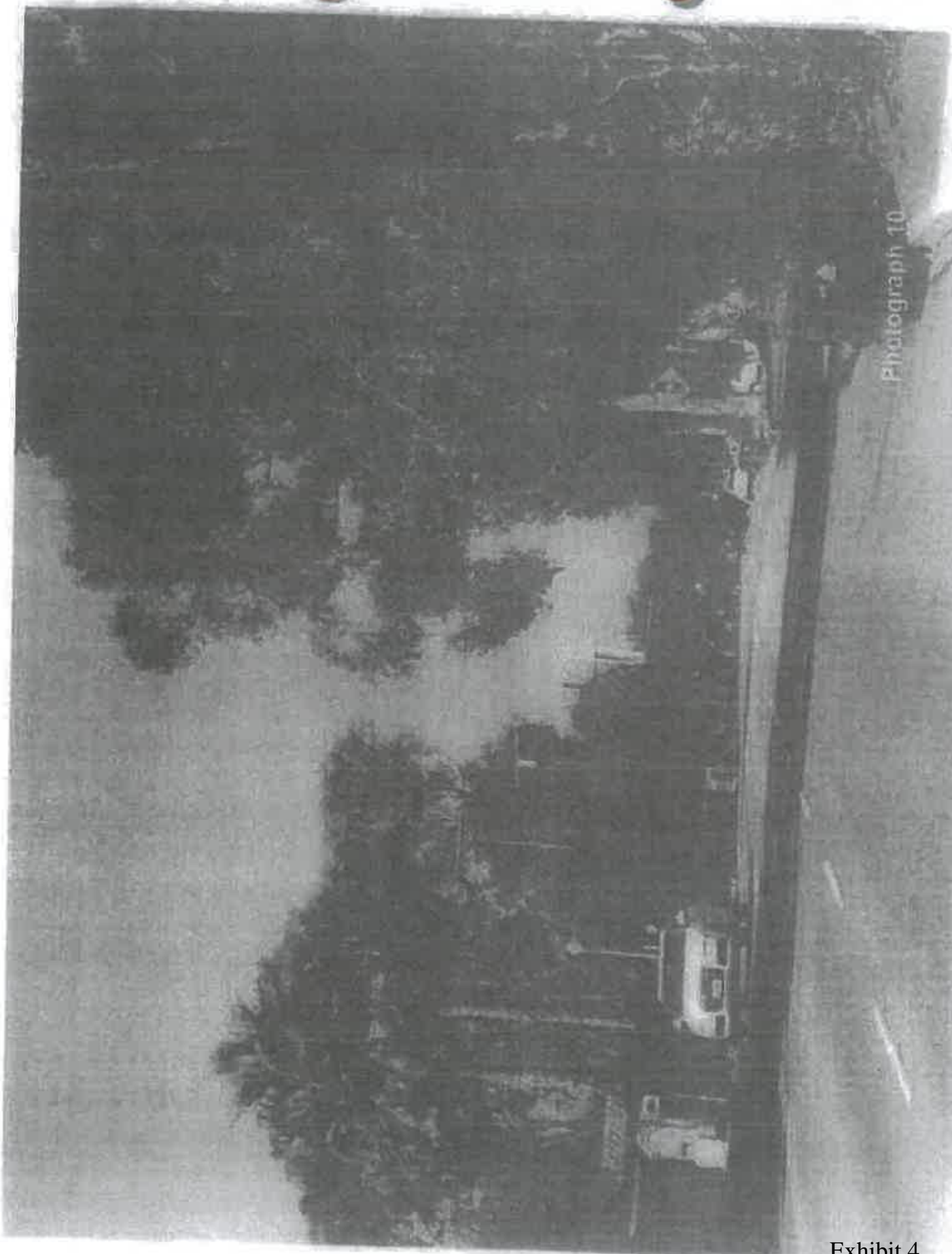
Photograph 7



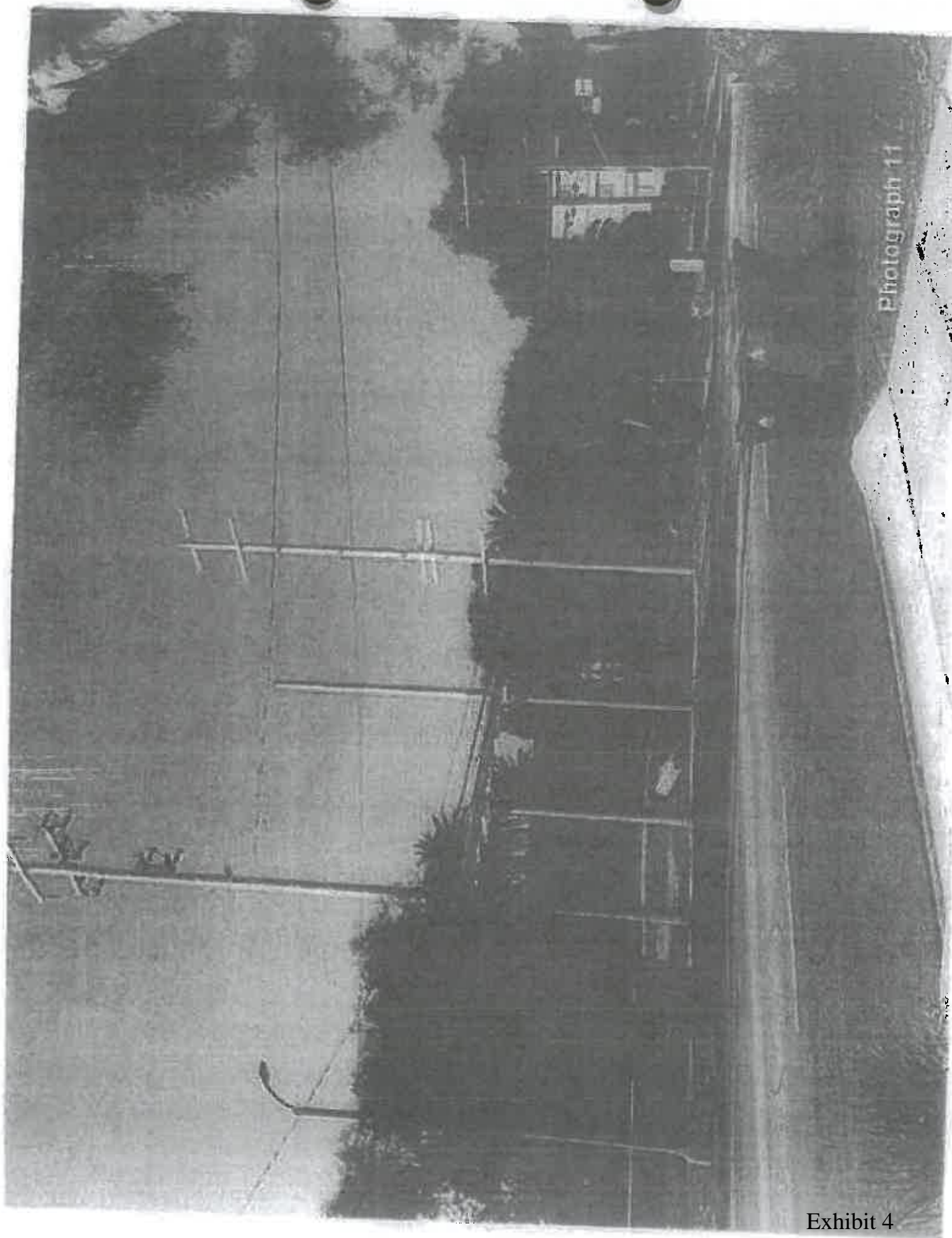
Photograph 8



Photograph 9



Photograph 10



Photograph 11

ATTACHMENT G

PIDS PUBLIC OUTREACH MATERIALS AND ARTICLES

EXHIBIT “2”

Exhibit 2

Notice of Public Hearing

**BOARD OF PUBLIC WORKS
MEMBERS**

**KEVIN JAMES
PRESIDENT**

**HEATHER MARIE REPENNING
VICE PRESIDENT**

**MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE**

**JOEL F. JACINTO
COMMISSIONER**

**LUZ M. RIVAS
COMMISSIONER**

**FERNANDO CAMPOS
EXECUTIVE OFFICER**

**CITY OF LOS ANGELES
CALIFORNIA**



**ERIC GARCETTI
MAYOR**

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING**

**GARY LEE MOORE, PE, ENV SP
CITY ENGINEER**

**1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213**

<http://eng.lacity.org>

Date: October 25, 2016

To: Property Owners, Residents, and All Interested Parties:

NOTICE OF PUBLIC HEARING: NOVEMBER 9, 2016 @ 1:30 PM

This is to notify you of a public hearing scheduled for November 9, 2016 at 1:30 PM.

Location: Palisades Branch Library, 861 Alma Real Drive, Pacific Palisades, CA 90272

Project Title: Coastal Development Permit Application No. 16-14 for the LADWP Temporary Pole Top Distribution Station (PTDS) – Sunset Bl at Marquez Av

Project background: The PTDS is needed to alleviate three overloaded 4,800-volt circuits that serve the Palisades community. These circuits connect to the Distribution Station 29 (DS-29), which has been operating beyond its designed capacity. The PTDS has to be located at a site with existing infrastructures to facilitate connection. Under-grounding is not feasible due to size and risk of water intrusion.

Project Description: The project consists of a temporary Pole-Top Distribution Station (PTDS) in the Pacific Palisades community. The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 47" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables, which will be connected to the PTDS via underground cable terminations. The underground substructure consists of approximately 1,000' of trench for conduit installation with a 9'4" X 17'4" substructure near the PTDS. The trench will be from two existing substructures on Marquez and Sunset to the new substructure and the PTDS. The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational. The PTDS is not a permanent solution for the need to provide adequate power service for the Palisades community.

You and other interested persons, as well as the applicant may speak at the hearing or submit written information. All written comments pertaining to compliance with the Coastal Act received at or before the hearing will be considered prior to a decision on the case. Written comments should be sent by e-mail to Catalina.Hernandez@lacity.org, or mail to:

City of Los Angeles Department of Public Works, BOE EMG
Attention: Catalina Hernandez, Environmental Supervisor
1149 S. Broadway, Suite 600, Mail Stop 939, Los Angeles, CA 90015-2213



The application, exhibits and other information relating to the case are available for your review in Suite 600, 1149 S. Broadway. If you have any questions please contact Catalina Hernandez at (213) 485-5756.

Sincerely,

Gary Lee Moore, P.E., ENV SP
City Engineer

By  Maria Martin, Manager
Environmental Management Group

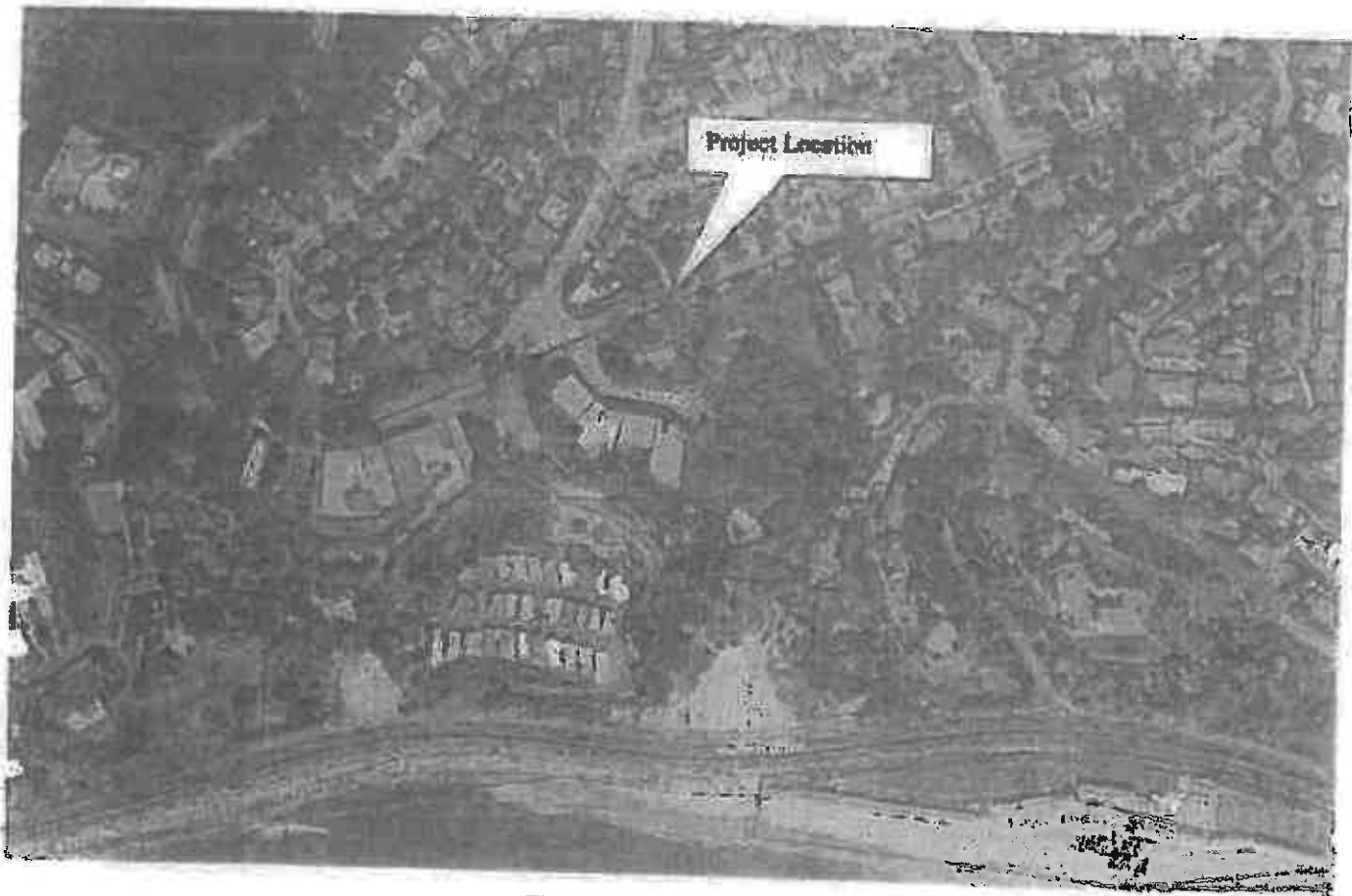


Figure 1. Project Location

EXHIBIT “3”

Exhibit 3

Petition and Facebook

Recipient: LADWP, Mike Bonin, Council District 11, Los Angeles Bureau of Engineering, California Coastal Commission, Tricia Keane, Ezra Gale, and Sharon Shapiro

Letter: Greetings,

The Los Angeles Department of Water & Power is in the process of installing a Pole Top Distribution Station near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP was in the process of installing this system without the required Coastal Approvals when they were halted by the Coastal Commission, and are now seeking the necessary Coastal Development Permit for this construction.

As homeowners and concerned members of the neighborhood, we firmly oppose the issuance of this Coastal Development Permit. The station is a hulking 61' tall industrial blight which is detrimental to the character and visual resources of our neighborhood. We urge the City of Los Angeles to uphold the Coastal Act and deny this Coastal Development Permit.

Our goal is to be reasonable. If the installation must occur, then it should take the form of a more aesthetically pleasing alternative: either an underground or pad-mounted transformer. Either option would minimize the visual impact of this installation, and both have been confirmed as viable by professional engineering consultants. Though these solutions may be more costly, they are ultimately the right solution for our neighborhood and are respectful to the visual resources of this Coastal community.

Finally, LADWP claims that this is a "temporary" installation. Thus, any Coastal Development Permit must provide a maximum 4-year timeframe within which the poles have to be removed. Otherwise, this will become a permanent solution being sold as merely temporary in order to slide through the approvals process with reduced scrutiny.

For those who oppose the Pole Top Distribution Station in its current form, please also make your voice heard at the hearing this Wednesday, November 9, 2016 from 1:30p - 3:30p. The address for the hearing is as follows:
Palisades Branch Library: 861 Alma Real Dr, Pacific Palisades, CA 90272

Signatures

Name	Location	Date
Steven Somers	Los Angeles, CA, United States	2016-11-04
Kimberly Ryan	Los Angeles, CA, United States	2016-11-04
Alex Cornelius	Santa Monica, CA, United States	2016-11-04
Nanci VeSota	Santa Monica, CA, United States	2016-11-04
Christopher Damon	Los Angeles, CA, United States	2016-11-04
Lewis Adelson	Venice, CA, United States	2016-11-04
MICHELE REA	Manhattan Beach, CA, United States	2016-11-05
Brett Sobel	Los Angeles, CA, United States	2016-11-06
Kat Smith	Los Angeles, CA, United States	2016-11-06
Sarah Conner	Pacific Palisades, CA, United States	2016-11-06
Diane bleak	Los Angeles, CA, United States	2016-11-06
Andre Redelinghuys	Los Angeles, CA, United States	2016-11-06
Carlos Bulling	Los Angeles, CA, United States	2016-11-06
Danielle Colvert	Los Angeles, CA, United States	2016-11-06
Jaimr Offenberger	Los Angeles, CA, United States	2016-11-06
Chuck McSorley	Los Angeles, CA, United States	2016-11-06
Matt Daenzer	Pacific Palisades, CA, United States	2016-11-06
Laura Idelson	Los Angeles, CA, United States	2016-11-06
Lori Tierney	Los Angeles, CA, United States	2016-11-06
Anna Purdum	Los Angeles, CA, United States	2016-11-06
Chris Consalvo	Santa Monica, CA, United States	2016-11-06
Jody Erenberg	Los Angeles, CA, United States	2016-11-06
Veronica Caudillo	Malibu, CA, United States	2016-11-06
Bonnie Levitsky	Los Angeles, CA, United States	2016-11-06
Maria Bonafede	Venice, CA, United States	2016-11-06
Barni Rothman	Los Angeles, CA, United States	2016-11-06
Amy Lundberg	Pacific Palisades, CA, United States	2016-11-06
Mark Casamento	Los Angeles, CA, United States	2016-11-06
Kaden Foster	Pacific Palisades, CA, United States	2016-11-06
Joelle Dumas	Venice, CA, United States	2016-11-06

Name	Location	Date
Hilary Baker	Los Angeles, CA, United States	2016-11-06
Candace Tysdal	Los Angeles, CA, United States	2016-11-07
Nancy Jackson	Los Angeles, CA, United States	2016-11-07
James Burkett	Los Angeles, CA, United States	2016-11-07
Natalie Bernstein	Malibu, CA, United States	2016-11-07
carrie white	Beverly Hills, CA, United States	2016-11-07
Suzanne Roberts	Pacific Palisades, CA, United States	2016-11-07
Francyne Lambert	Malibu, CA, United States	2016-11-07
David Rosenthal	Los Angeles, CA, United States	2016-11-07
Cory Taylor	LOS ANGELES, CA, United States	2016-11-07
Edward Laurson	Denver, CO, United States	2016-11-07
Myriam Marques	Malibu, CA, United States	2016-11-07
Cheryl Z	Los Angeles, CA, United States	2016-11-07
Alli Solum	Los Angeles, CA, United States	2016-11-07
Laura Kooby	beverly hills, CA, United States	2016-11-07
Sandrs Correia	Los Angeles, CA, United States	2016-11-07
Haldis Toppel	Los Angeles, CA, United States	2016-11-07
Mark Ryavec	Venice, CA, United States	2016-11-07
vicki halliday	Venice, CA, United States	2016-11-07
Hirad Dadgostar	Los Angeles, CA, United States	2016-11-07
Cristina Cameron	Los Angeles, CA, United States	2016-11-07
kevin malek	Los Angeles, CA, United States	2016-11-07
Elizabeth Abbe	Pacific Palisades, CA, United States	2016-11-07
Brett Niven	Los Angeles, CA, United States	2016-11-07
Campbell Britton	Pacific Palisades, CA, United States	2016-11-07
AMY GREENWOOD	Los Angeles, CA, United States	2016-11-07
Madeline Fry	Los Angeles, CA, United States	2016-11-07
Heidi Cunningham	Los Angeles, CA, United States	2016-11-07
Christina Singleton	Los Angeles, CA, United States	2016-11-07
Michael Richards	Los Angeles, CA, United States	2016-11-07
Josie Tong	Los Angeles, CA, United States	2016-11-07
Melissa McSorley	Los Angeles, CA, United States	2016-11-07

Name	Location	Date
Steven Mandell	Los Angeles, CA, United States	2016-11-07
Giovanna Imbesi	Venice, CA, United States	2016-11-07
Jeanne Elfant Festa	Pacific Palisades, CA, United States	2016-11-07
Dana Mayo	Los Angeles, CA, United States	2016-11-07
Lou Kerner	Los Angeles, CA, United States	2016-11-07
Anne Keeler	Los Angeles, CA, United States	2016-11-07
Victoria Collison	Los Angeles, CA, United States	2016-11-07
Katherine Samuels	Los Angeles, CA, United States	2016-11-07
S Cummings	Los Angeles, CA, United States	2016-11-07
BRIAN DEMING	Los Angeles, CA, United States	2016-11-07
Judy Wagner	Los Angeles, CA, United States	2016-11-07
Lotus Fulton	Los Angeles, CA, United States	2016-11-07
Herbert Kleinman	Los Angeles, CA, United States	2016-11-07
Sharon Kilbride	Santa Monica, CA, United States	2016-11-07
Marsha Hunt	Los Angeles, CA, United States	2016-11-07
Rodica Moody	Santa Monica, CA, United States	2016-11-07
Gene Cameron	Pacific Palisades, CA, United States	2016-11-07
Claudia Vallon	Pacific Palisades, CA, United States	2016-11-07
Mary Rapoport	Los Angeles, CA, United States	2016-11-07
Daphne Gronich	Los Angeles, CA, United States	2016-11-07
Jenn Ingram	Venice, ca, CA, United States	2016-11-07
Tracy Landau	Pacific Palisades, CA, United States	2016-11-07
Gina Wahlgren	Los Angeles, CA, United States	2016-11-07
Karen Fishel	Los Angeles, CA, United States	2016-11-07
Bryan Crane	Los Angeles, CA, United States	2016-11-07
Marge Gold	Los Angeles, CA, United States	2016-11-07
Richard Wahlgren	Los Angeles, CA, United States	2016-11-07
Angelica Hernández	Pacific Palisades, CA, United States	2016-11-07
Patrick Wong	Los Angeles, CA, United States	2016-11-07
Robin Dodson	Los Angeles, CA, United States	2016-11-07
Simon Gallagher	Los Angeles, CA, United States	2016-11-07
Pam Finck	Pacific palisades, CA, United States	2016-11-07

Name	Location	Date
Lois Shickman	Los Angeles, CA, United States	2016-11-07
d. flores	Los Angeles, CA, United States	2016-11-07
Victoria Warren	Pacific Palisades, CA, United States	2016-11-07
James Cummings	Los Angeles, CA, United States	2016-11-07
Gregory Roberts	Pacific Palisades, CA, United States	2016-11-07
Jake Malott	Los Angeles, CA, United States	2016-11-07
Pam Brendlinger	Pacific Palisades, CA, United States	2016-11-07
Sharon tennant	Los Angeles, CA, United States	2016-11-07
alex whitehead	Los Angeles, CA, United States	2016-11-07
Nili Ovsiowitz	Malibu, CA, United States	2016-11-07
lauren shepherd	Los Angeles, CA, United States	2016-11-07
Dean Grinsfelder	Los Angeles, CA, United States	2016-11-07
Connor Stark	Los Angeles, CA, United States	2016-11-07
Parisa Nejad	Beverly Hills, CA, United States	2016-11-07
Justin Ewart	Los Angeles, CA, United States	2016-11-07
Krista Ewart	Los Angeles, CA, United States	2016-11-07
sandra miller	Santa Monica, CA, United States	2016-11-07
Thomas DuMary III	Los Angeles, CA, United States	2016-11-07
Jeff Outcalt	Los Angeles, CA, United States	2016-11-07
Madeleine Kennell	Los Angeles, CA, United States	2016-11-07
Anthony Marguleas	Los Angeles, CA, United States	2016-11-07
Lauren Rubin	Los Angeles, CA, United States	2016-11-07
Steve Sawai	Los Angeles, CA, United States	2016-11-07
Sarah Knauer	Los Angeles, CA, United States	2016-11-07
Cody Carras	Los Angeles, CA, United States	2016-11-07
jade devote	Santa Monica, CA, United States	2016-11-07
Peter Morley	Los Angeles, CA, United States	2016-11-07
Lisa Taylor	Los Angeles, CA, United States	2016-11-07
Brad Aarons	Venice, CA, United States	2016-11-07
Lowell Cauffiel	Los Angeles, CA, United States	2016-11-07
jason ungar	Los Angeles, CA, United States	2016-11-07
Tyler Coleman	Los Angeles, CA, United States	2016-11-07

Name	Location	Date
elisabeth wolt	Los Angeles, CA, United States	2016-11-07
Nicole Hillebrandt	Los Angeles, CA, United States	2016-11-07
jayne pitchford	santa monica, CA, United States	2016-11-07
Lauren Zappas	Los Angeles, CA, United States	2016-11-07
Bill Wolf	Burbank, CA, United States	2016-11-07
Mark D Douglas *	Los Angeles, CA, United States	2016-11-07
Molly Betuel	Malibu, CA, United States	2016-11-07
glen beer	Malibu, CA, United States	2016-11-07
Holly Davis	Los Angeles, CA, United States	2016-11-07
Lindsey Femimore	Long Beach, CA, United States	2016-11-07
Vonnie Cameron	Los Angeles, CA, United States	2016-11-07
Reza Akef	Los Angeles, CA, United States	2016-11-07
Brenda Theveny	Los Angeles, CA, United States	2016-11-07
Michael Hoffman	Los Angeles, CA, United States	2016-11-07
Dan Urbach	Pacific Palisades, CA, United States	2016-11-07
Jane Herman	Thousand Oaks, CA, United States	2016-11-07
Kelly Kaine	Los Angeles, CA, United States	2016-11-07
Ken Unmacht	Los Angeles, CA, United States	2016-11-07
Rachel Ortiz	Santa Monica, CA, United States	2016-11-07
Julie Martin	Frederic, WI, United States	2016-11-08
Christine Maalouf	Los Angeles, CA, United States	2016-11-08
Christine Doll	Northridge, CA, United States	2016-11-08
Julieanne Hathaway	Los Angeles, CA, United States	2016-11-08
Mitchell Gavin	Los Angeles, CA, United States	2016-11-08
Sarah Korda	Los Angeles, CA, United States	2016-11-08

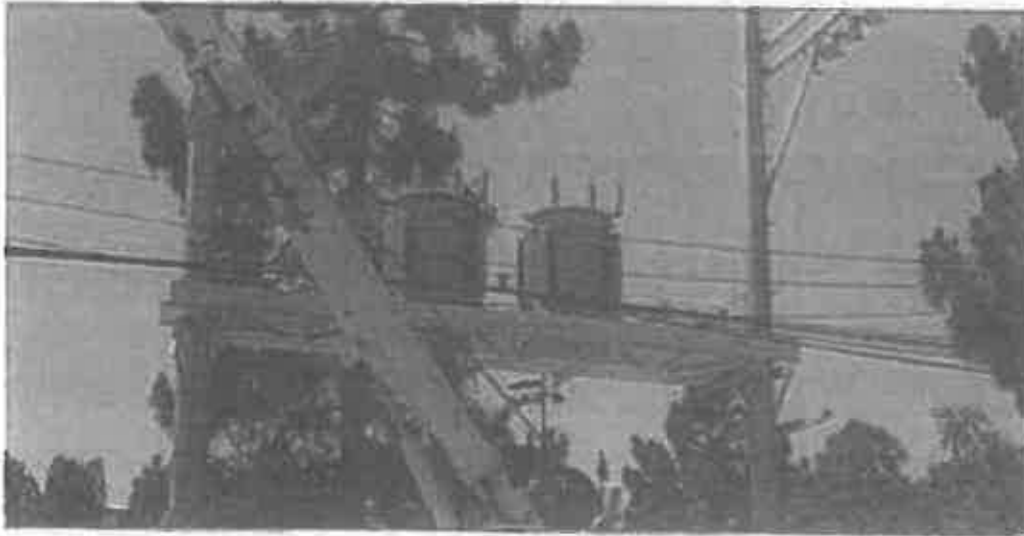


Pacific Palisades Residents Association

November 5 at 6:55pm · 🌐

Protect Sunset Boulevard's Scenic Highway! Sign the petition urging DWP to modify this installation. Sign ASAP-- public hearing Wed. Nov. 9 Palisades library 1:30 pm. Please like, share, and click this link and sign petition to #Protect our scenic highway!

<https://www.change.org/p/ladwp-support-a-solution-to-the-la...>



LADWP: Support a ---- solution to the LADWP power....

The Los Angeles Department of Water & Power is in the process of installing a Pole Top Distribution Station near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP was in the process of installing this system without the...

[CHANGE.ORG](https://www.change.org)

👍 Like

💬 Comment

🔗 Share

👤👤👤 You and 838 others

Chronological ▾

45 shares



Evelynne Azam Je signe de tout ❤️ et je partage
See Translation

Like · Reply · 🕒 1 · November 6 at 10:10pm



Rich Lechler i kinda like it up in the air

Like · Reply · 🕒 2 · 18 hrs



Tom Mackey Agree ... better show when it explodes

Like · Reply · 8 hrs



Write a reply...



Mimi Toberman Sarah Nelson

Like · Reply · 48 mins



Write a comment...



Exhibit 4

Page 162 of 315

Save the Palisades Bluffs
November 5 at 8:35pm · 🌐

Protect Sunset Boulevard's Scenic Highway! Sign the petition urging DWP to modify this installation. Sign ASAP... public hearing Wed. Nov. 9 Palisades library 1:30 pm. Please like, share and sign this link to #Protect our scenic highway!

<https://www.change.org/p/ladwp-support-a-solution-to-the-la...> link



👍 Like 💬 Comment ➦ Share

👍 192

Top Comments

28 shares



Write a comment...



Save the Palisades Bluffs No one is fighting this location. The neighbors want a more attractive solution from DWP at the same location and protect the integrity of our scenic highway! Please read the petition.

Like · Reply · 🌐 1 · November 5 at 8:19pm



Save the Palisades Bluffs And this is what it would look like if grounded and concealed with plants.



Like · Reply · 🌐 5 · November 5 at 9:16pm

View 17 more comments

EXHIBIT “4”

Exhibit 4

Staff Report

**BOARD OF PUBLIC WORKS
MEMBERS**

**KEVIN JAMES
PRESIDENT**

**HEATHER MARE REOPENING
VICE PRESIDENT**

**MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE**

**JOEL F. JACINTO
COMMISSIONER**

**LUZ M. RIVAR
COMMISSIONER**

**FERNANDO CAMPOS
EXECUTIVE OFFICER**

**CITY OF LOS ANGELES
CALIFORNIA**



**ERIC GARCETTI
MAYOR**

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING**

**GARY LEE MOORE, FE, ENV SP
CITY ENGINEER**

**1149 S BROADWAY, SUITE 700
LOS ANGELES CA 90015-2213**

<http://eng.lacity.org>

COPY

**COASTAL DEVELOPMENT PERMIT APPLICATION NO. 16-14
DRAFT STAFF REPORT**

*(Under authority of the California Coastal Act, § 30600(b) of the California Public Resources Code,
and Chapter 1, Article 2, § 12.20.2 of the Los Angeles City Municipal Code)*

I. PROJECT DESCRIPTION

Project Title: Inter. @ Sunset Blvd @ Marquez
Ave.

Applicants: Department of Water and Power

Project Location:

Council District: 11

Community: Brentwood-Pacific Palisades

District: West Los Angeles

A. Project Description:

The project is located in the public right-of-way parallel with Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place, within the Brentwood-Pacific Palisades Community Plan (Figure 1, Project Vicinity Map and Figure 2, Aerial Overview).

The Los Angeles Department of Water and Power (LADWP) installed a temporary Pole-Top Distribution Station (PTDS) on Sunset Boulevard in the Pacific Palisades community.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 4'7" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The underground substructure will be connected to the PTDS via underground cable

terminations. The underground substructure consists of approximately 1,000' of trench for conduit installation with a 9'4" X 17'4" substructure near the PTDS. The trench will be from two existing substructures on Marquez and Sunset to the new substructure and the PTDS. The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational. The PTDS is not a permanent solution for the need to provide adequate power service for the Palisades community.

All applicable regulations will be incorporated into and adhered to per standard procedures

B. Project Background:

"Currently, the power load in Pacific Palisades is being distributed by a single distribution station, Distribution Station 29 (DS-29), constructed almost 80 years ago. The heaviest power load is also being distributed on circuits that are furthest away from DS-29, which negatively impacts reliability for the entire area. There is no space at DS-29 to build more capacity, and LADWP has not yet selected a site for a new D.S. As a temporary measure to relieve three overloaded 4,800 volts circuits that currently serve the Pacific Palisades community, Distribution Construction and Maintenance (DC&M) proposes to install two PTDS Stations. To prevent power outages, limit outage durations, and

...the
... ..
... ..
... ..
... ..
... ..
... ..
... ..
... ..
... ..

2. Amphiprion lineatus.

1. The first group of people who are not in the labor force are those who are not in the labor force for any reason. This group is the largest and is made up of people who are not in the labor force for any reason.

10. The following information is provided for the year ended 31 December 2014:

14. *Chrysomelidae*

21. ROBERT ALTON BARKER BOB HOVING

1. Project Objectives

MC § 1000b, allows local governments to exercise authority to issue coastal disturbance permits within its jurisdiction before certification of its local coastal program and the Project is within the City Engineer's jurisdiction (LAI MC § 1000b, et seq.). The application filed with the City Engineer was deemed adequate.

The Coastal Commission has the responsibility to review proposals for development in the San Pedro coastal zone for compliance with the California Coastal Act of 1972.

The City of Los Angeles does not have a modified Local Coastal Program. However, other non-function of the Local Coastal Program, permit processing procedures for coastal permits in the San Pedro coastal zone are controlled by the Coastal Act and the California Code of Regulations. The City's coastal zoning ordinance is also in conflict as part of the Local Implementation Plan. After certification of the Local Coastal Program to the Coastal Commission, the authority of the Coastal Commission is limited to development within the coastal zone and to projects of locally based coastal development activity.

1. The first step is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

[illegible]

General Article, dated 1963/1964, does not apply to development projects or institutions in any category, subcategory, kind, or no other category. The Commission also retains jurisdiction over coastal development permits that were previously approved by the Commission as well as amendments to such permits.

The temporary Policy Coordination Station project is located within the California Coastal Zone which is considered "single coastal jurisdiction" i.e. the Coastal Zone of the City of Los Angeles alone. The project must be authorized by a coastal development permit pursuant to the requirements of the Coastal Act. The PDPS is considered development as defined by Section 40016 of the Coastal Act because it falls within the Coastal Act zone.

[illegible]

Draft Staff Report
Coastal Development Permit No. 16-14

harvesting of major vegetation other than agricultural purposes, help harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provision of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).

B. Coastal Guidelines

In accordance with the provisions of Section 30620 of the Public Resources Code, and, in order to sustain the findings contained in Section 12.20.2-G(c) of the Municipal Code which requires a review and consideration of "...Interpretative Guidelines for Coastal Planning and Permits...", the State Coastal Commission has issued Interpretative Guidelines for the South Coast Region of Los Angeles including certain subareas of the City of Los Angeles. These subareas are defined as Pacific Palisades, Venice, Playa Del Rey, San Pedro and Wilmington. However, following prevailing case law (e.g., Pacific Legal Foundation v. Coastal Commission (1982) 33 Cal.3d 158), the City Engineer's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations.

C. Issues of Legal Adequacy of the Application

None

III. STAFF FINDINGS

Six findings are required in order for a Coastal Development Permit to be issued. The six findings are:

(1) That the development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

(2) That the permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

(3) That the Interpretative Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the

light of the individual project in making its determination.

(4) That the decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

(5) If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, that the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

(6) Any other finding or findings as may be required for the development by the California Environmental Quality Act.

Staff finds as follows:

1. The development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

In addition to the policies discussed above, Chapter 3 of the California Coastal Act of 1976 provides:

a) MARINE ENVIRONMENT (Article 4, of Chapter 3 of Public Resources Code, Sections 30230 through 30237)

Sections 30230 and 30231 state:

Section 30230 Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms used for the protection of human health shall be maintained.

Journal of Management Development, 1996, Vol. 15, No. 6, 416

The present study reported in chapter two covered winter, wetlands, migratory and lake fish in the southernmost part of the state in relation to the river and sea.

Project construction will not involve transport of hazardous substances and thus there will be no spillage or leak out of petroleum products or hazardous substances as prohibited by PRC Section 302.13. The project will not involve the dumping, filling, or dredging of open coastal waters (PRC Section 302.33), commercial fishing and recreational fishing activities (PRC Sections 302.34 and 302.34.5), constructing, reconstructing, breakwaters or other structures along the natural shoreline (PRC Section 302.35). The project does not alter river or stream bed, therefore does not affect water supply and flood control (PRC Section 302.36). PRC Section 302.37 relates to dredge, sand, silt and therefore does not apply.

2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2681, 2682, 2683, 2684, 2685, 26

and being essentially neutral to foreign currencies, the practices of currency and commodity distribution, national culture, and other social dependencies are the commonest depth of effects of culture change.

education means that to start and design a
 physical program that meets individual needs
 there needs and that to communicate with the
 community of living together and in harmony
 Section 10122.100. The following shall be
 required in the development of public health and
 is required by the State Health Department
 The following shall be required in the
 development of public health and

THE UNIVERSITY OF CHICAGO PRESS
530 N. Dearborn Ave., Chicago, Ill. 60610
U.S.A. and Canada
Other countries: 100 Brook Hill Drive, Secaucus, N.J. 07094
U.S.A.

[illegible]

The project involved removal of four cylindrical
bins of approximately 75 ft. dia. in height
(about 100 ft. dia. with the 10 ft. base).
Removal of the bins was to enable the
Department of Public Works
Bureau of Street Services to install replacement of
curbstone bins and any other requirements to
be determined by the Bureau.

The project was a within an area of known technological resources. The project is in the public right of way, which has already been designated and dedicated.

Following the review, certain concerns are highlighted and discussed. They are implemented as outlined in the second part of Section 2 of the report.

Public Resources Code, Sections 6050, 6051, 6052, 6053, 6054, 6055, 6056, 6057, 6058, 6059, 6060, 6061, 6062, 6063, 6064, 6065, 6066, 6067, 6068, 6069, 6070, 6071, 6072, 6073, 6074, 6075, 6076, 6077, 6078, 6079, 6080, 6081, 6082, 6083, 6084, 6085, 6086, 6087, 6088, 6089, 6090, 6091, 6092, 6093, 6094, 6095, 6096, 6097, 6098, 6099, 6100, 6101, 6102, 6103, 6104, 6105, 6106, 6107, 6108, 6109, 6110, 6111, 6112, 6113, 6114, 6115, 6116, 6117, 6118, 6119, 6120, 6121, 6122, 6123, 6124, 6125, 6126, 6127, 6128, 6129, 6130, 6131, 6132, 6133, 6134, 6135, 6136, 6137, 6138, 6139, 6140, 6141, 6142, 6143, 6144, 6145, 6146, 6147, 6148, 6149, 6150, 6151, 6152, 6153, 6154, 6155, 6156, 6157, 6158, 6159, 6160, 6161, 6162, 6163, 6164, 6165, 6166, 6167, 6168, 6169, 6170, 6171, 6172, 6173, 6174, 6175, 6176, 6177, 6178, 6179, 6180, 6181, 6182, 6183, 6184, 6185, 6186, 6187, 6188, 6189, 6190, 6191, 6192, 6193, 6194, 6195, 6196, 6197, 6198, 6199, 6200, 6201, 6202, 6203, 6204, 6205, 6206, 6207, 6208, 6209, 6210, 6211, 6212, 6213, 6214, 6215, 6216, 6217, 6218, 6219, 6220, 6221, 6222, 6223, 6224, 6225, 6226, 6227, 6228, 6229, 6230, 6231, 6232, 6233, 6234, 6235, 6236, 6237, 6238, 6239, 6240, 6241, 6242, 6243, 6244, 6245, 6246, 6247, 6248, 6249, 6250, 6251, 6252, 6253, 6254, 6255, 6256, 6257, 6258, 6259, 6260, 6261, 6262, 6263, 6264, 6265, 6266, 6267, 6268, 6269, 6270, 6271, 6272, 6273, 6274, 6275, 6276, 6277, 6278, 6279, 6280, 6281, 6282, 6283, 6284, 6285, 6286, 6287, 6288, 6289, 6290, 6291, 6292, 6293, 6294, 6295, 6296, 6297, 6298, 6299, 6300, 6301, 6302, 6303, 6304, 6305, 6306, 6307, 6308, 6309, 6310, 6311, 6312, 6313, 6314, 6315, 6316, 6317, 6318, 6319, 6320, 6321, 6322, 6323, 6324, 6325, 6326, 6327, 6328, 6329, 6330, 6331, 6332, 6333, 6334, 6335, 6336, 6337, 6338, 6339, 6340, 6341, 6342, 6343, 6344, 6345, 6346, 6347, 6348, 6349, 6350, 6351, 6352, 6353, 6354, 6355, 6356, 6357, 6358, 6359, 6360, 6361, 6362, 6363, 6364, 6365, 6366, 6367, 6368, 6369, 6370, 6371, 6372, 6373, 6374, 6375, 6376, 6377, 6378, 6379, 6380, 6381, 6382, 6383, 6384, 6385, 6386, 6387, 6388, 6389, 6390, 6391, 6392, 6393, 6394, 6395, 6396, 6397, 6398, 6399, 6400, 6401, 6402, 6403, 6404, 6405, 6406, 6407, 6408, 6409, 6410, 6411, 6412, 6413, 6414, 6415, 6416, 6417, 6418, 6419, 6420, 6421, 6422, 6423, 6424, 6425, 6426, 6427, 6428, 6429, 6430, 6431, 6432, 6433, 6434, 6435, 6436, 6437, 6438, 6439, 6440, 6441, 6442, 6443, 6444, 6445, 6446, 6447, 6448, 6449, 6450, 6451, 6452, 6453, 6454, 6455, 6456, 6457, 6458, 6459, 6460, 6461, 6462, 6463, 6464, 6465, 6466, 6467, 6468, 6469, 6470, 6471, 6472, 6473, 6474, 6475, 6476, 6477, 6478, 6479, 6480, 6481, 6482, 6483, 6484, 6485, 6486, 6487, 6488, 6489, 6490, 6491, 6492, 6493, 6494, 6495, 6496, 6497, 6498, 6499, 6500, 6501, 6502, 6503, 6504, 6505, 6506, 6507, 6508, 6509, 6510, 6511, 6512, 6513, 6514, 6515, 6516, 6517, 6518, 6519, 6520, 6521, 6522, 6523, 6524, 6525, 6526, 6527, 6528, 6529, 6530, 6531, 6532, 6533, 6534, 6535, 6536, 6537, 6538, 6539, 6540, 6541, 6542, 6543, 6544, 6545, 6546, 6547, 6548, 6549, 6550, 6551, 6552, 6553, 6554, 6555, 6556, 6557, 6558, 6559, 6560, 6561, 6562, 6563, 6564, 6565, 6566, 6567, 6568, 6569, 6570, 6571, 6572, 6573, 6574, 6575, 6576, 6577, 6578, 6579, 6580, 6581, 6582, 6583, 6584, 6585, 6586, 6587, 6588, 6589, 6590, 6591, 6592, 6593, 6594, 6595, 6596, 6597, 6598, 6599, 6600, 6601, 6602, 6603, 6604, 6605, 6606, 6607, 6608, 6609, 6610, 6611, 6612, 6613, 6614, 6615, 6616, 6617, 6618, 6619, 6620, 6621, 6622, 6623, 6624, 6625, 6626, 6627, 6628, 6629, 6630, 6631, 6632, 6633, 6634, 6635, 6636, 6637, 6638, 6639, 6640, 6641, 6642, 6643, 6644, 6645, 6646, 6647, 6648, 6649, 6650, 6651, 6652, 6653, 6654, 6655, 6656, 6657, 6658, 6659, 6660, 6661, 6662, 6663, 6664, 6665, 6666, 6667, 6668, 6669, 6670, 6671, 6672, 6673, 6674, 6675, 6676, 6677, 6678, 6679, 6680, 6681, 6682, 6683, 6684, 6685, 6686, 6687, 6688, 6689, 6690, 6691, 6692, 6693, 6694, 6695, 6696, 6697, 6698, 6699, 6700, 6701, 6702, 6703, 6704, 6705, 6706, 6707, 6708, 6709, 6710, 6711, 6712, 6713, 6714, 6715, 6716, 6717, 6718, 6719, 6720, 6721, 6722, 6723, 6724, 6725, 6726, 6727, 6728, 6729, 6730, 67

[illegible]

The above is a summary of the information received from the various sources mentioned above. It is not intended to be a complete statement of the facts, but only a summary of the information received from the various sources mentioned above.

Draft Staff Report
Coastal Development Permit No. 16-14

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.

The project consists of two 61-foot high, 12.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 4'7" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The project is located in the public right-of-way parallel with Sunset Boulevard near the intersection with Marquez Avenue and Marquez Place.

Sunset Boulevard is a City designated scenic highway. Scenic features include views of mountains and estates. According to the Mobility Plan 2035, an element of the General Plan for the City of Los Angeles, "a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground. b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway".

Measures have been implemented to help screen the structures. Their placement is where other utility poles and lights are located. They will be painted to blend in with the surroundings.

No adverse impacts to scenic and visual qualities of the coastal area are expected (Figures 3 and 4).

Section 30252. The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3)

providing non automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project does not interfere with any existing coastal access roadways, bikeways, pedestrian paths or walkways.

Section 30253. 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 land forms along the 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.*
- (4) Minimize energy consumption and vehicle miles traveled.*
- (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

The project would not affect geologic, flood or fire risks (30253(1) (2)), would not conflict with any requirements of the State Air Resources Control Board or South Coast Air Quality District (30253(3)), would not affect energy consumption and vehicle miles traveled (30253(4)), and would not permanently affect the local community (30253(5)).

d) INDUSTRIAL DEVELOPMENT (Article 7 of Chapter 3 of Public Resources Code, Sections 30260 through 30265.5)

The project does not involve the development or expansion of industrial development as defined in Article 7, and as such, Section 30202 through 30240 do not apply to this project.

2. The permitted development will not preclude the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1972.

The project conforms to national provisions and policies of the Coastal Act and the applicable International Pacific Fisheries Conservation Plan. The Community Plan recognizes the need for additional water, sewage facilities, fire protection services and other public facilities to support development within inland areas.

Thus the Project will not preclude the ability of the City to prepare a Local Coastal Program in conformity with the Coastal Act and amendments.

3. The Interpretative Guidelines for Coastal Planning and Permitting as established by the California Coastal Commission dated February 21, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making the City Engineer's determination.

As noted in the preceding findings, the California Coastal Commission's interpretive guidelines (State and Regional) for the Pacific Fisheries area have been reviewed and considered in preparation of these findings and recommendations. However, following prevailing case law (e.g., Pacific Legal Foundation v. Coastal Commission (1982) 33 Cal 3d 109), the City Engineer's determination is based on the direct provisions of the California Coastal Act and other legally established laws and regulations.

4. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30254-1 of the Public Resources Code.

The decision of the permit granting authority is consistent with the staff report of this project. It has been guided by the applicable decision of the California Coastal Commission pursuant to Section 30254-1 of the Public Resources Code.

5. If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1972.

6. Public Access (Article 3 of Chapter 3 of the Public Resources Code, Sections 30210 through 30240).

This project is located between the nearest public road and the sea or shoreline of a body of water located within the coastal zone.

The project will not interfere with coastal access and will not impact any existing access to the coast.

The project is located within the public right-of-way on Sunset Boulevard near the intersection with Michigan Avenue and Michigan Place. There is no coastal access at the project site.

7. PUBLIC ACCESS (Article 3 of Chapter 3 of Public Resources Code, Sections 30210 through 30240).

Section 30220, Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such use.

The project will not interfere with or remove any opportunity to access and utilize the water-oriented recreational area.

Section 30221, Upland areas necessary to support coastal recreational uses shall be reserved for such uses where feasible.

The project will not affect any currently undeveloped upland areas that might be reserved for coastal recreational uses. There are no existing coastal-dependent recreational uses at the project site.

8. Any other finding or finding as may be required for the development by the California Environmental Quality Act.

Pursuant to the California Environmental Quality Act (CEQA), the LAUSD Board on August 14, 1980, found the project to be exempt from CEQA review and filed a Finding of Exemption on May 26, 1980.

Draft Staff Report
Coastal Development Permit No. 16-14

Staff reviewed and considered the Notice of Exemption and determined there are no additional evaluations required by the California Environmental Quality Act in connection with the approval of this permit.

III. PUBLIC COMMENT

A public hearing is pending.

IV. STANDARD CONDITIONS OF APPROVAL

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 City Engineer's Office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the permit date as reported from the

Coastal Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the City Engineer.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the City Engineer an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the City Engineer and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.
6. **Other approvals.** Obtain permit from the State Coastal Commission.

V. SPECIAL CONDITIONS OF APPROVAL

1. **Monitor.** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards shall be present to monitor all ground-disturbing activities.
2. **Awareness Training.** Prior to initiation of ground-disturbing activities for the underground portions of the project, the archaeological monitor will conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training would explain the importance of and legal basis for the protection of significant archaeological resources. Each worker would also learn the proper procedures to follow in the event that cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor and the archaeological monitor. It is recommended that this worker education session include visual images of artifacts that might be found in the project vicinity, and that the session take place on-site immediately prior to the start of ground-disturbing activities.
3. **Inadvertent Discovery.** In the event that archaeological resources are exposed during construction, work in the immediate vicinity of the find must stop until a qualified archaeologist can evaluate the significance of the find and make applicable recommendations to avoid significant impacts to archaeological resources. Construction activities may continue in other areas. If the discovery proves significant under CEQA, additional work such as testing or data recovery may be warranted.

Final Staff Report

Coastal Development Permit No. 10-14

4. **Procedure for Human Remains.** In accordance with CHSRA Guidelines section 1504.302, in the event of the accidental discovery or recognition of any human remains during construction the following procedure shall be used:

(A) There shall be no further excavation or disturbance of the site of the human remains or any area for work immediately suspected to involve human remains pending until:

- (a) The Los Angeles County Coroner shall be notified in accordance with the jurisdiction of the cause of death is reported, and

- (b) After the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours;

2. The NAHC shall identify the person or persons it believes to be the owner which descended from the deceased Native American;

3. The most likely description shall be made and recommendations to the landowner or the person responsible for the excavation work, for removal or reburial or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5009.98. The MLI shall complete its inspection and make recommendations to the coroner for consent within 48 hours of being granted access to the site; or

(C) Where the following conditions occur, LAHWP or its authorized representative shall obey the Native American human remains and associated grave goods with appropriate dignity in a location not subject to further subgrade disturbance:

- A. The NAHC is unable to identify a MLI or the MLI fails to make a recommendation within 24 hours after being notified by the NAHC;

- B. The MLI identified fails to make a recommendation; or

- C. LAHWP or its authorized representative rejects the recommendations of the MLI and the resolution by the NAHC fails to provide an action acceptable to LAHWP.

5. **Written Report.** A written report detailing construction activities and recommendations for further treatment of archaeological resources shall be provided to the City upon completion of the monitoring work. The report shall comply with the requirements and recommendations of the California Office of Historic Preservation. A hard copy shall be submitted to the City for review within 30 days of monitoring completion. A hard copy shall be submitted to the City in hard copy and electronic format (Adobe PDF acceptable) no later than one week after receipt of comments on the hard report from the City. A hard copy of the report shall also be submitted to the South Central Coastal Information Center within 30 days (45 days if hard submitted to the City).

Draft Staff Report
Coastal Development Permit No. 16-14

VI. STAFF RECOMMENDATIONS

Based on the preceding analysis, we recommend that the City Engineer issue a Coastal Development Permit for this project

Maria Martin Date
Manager
Environmental Management Group

DOCUMENT PREPARED BY:

Catalina Hernandez Date
Environmental Supervisor I

VII. REFERENCES

1. California Coastal Act -- Public Resources Code Division 20, Section 30900 *et seq.*
2. California Coastal Commission, October 14, 1980. *Regional Interpretive Guidelines. South Coast Region. Los Angeles County.*
3. California Coastal Commission, December 16, 1981. *Statewide Interpretive Guidelines.*
4. California Department of Fish and Wildlife Natural Diversity Database (CNDDB) Rare Find, Version 3.1.1, dated May 01, 2016, data will expire November 1, 2016.
5. City of Los Angeles. *Framework Element of the Los Angeles General Plan.*
<https://planning.lacity.org/cnddb/commtech/chapter300-399.htm>
6. City of Los Angeles. *Municipal Code, Chapter 1, Article 2, Section 12.20 2. et seq.*
7. City of Los Angeles. *Brentwood-Pacific Palisades Community Plan.*
8. Federal Emergency Management Agency. *Flood Insurance Rate Map, Community Panel Number 0601370069D, February 4, 1987*
9. Pole-Top Distribution Station Installation, Pacific Palisades Community Background Information for California Environmental Quality Act Exemption, May 20, 2016

Beach Staff Report:
Coastal Development Permit No. 10-14

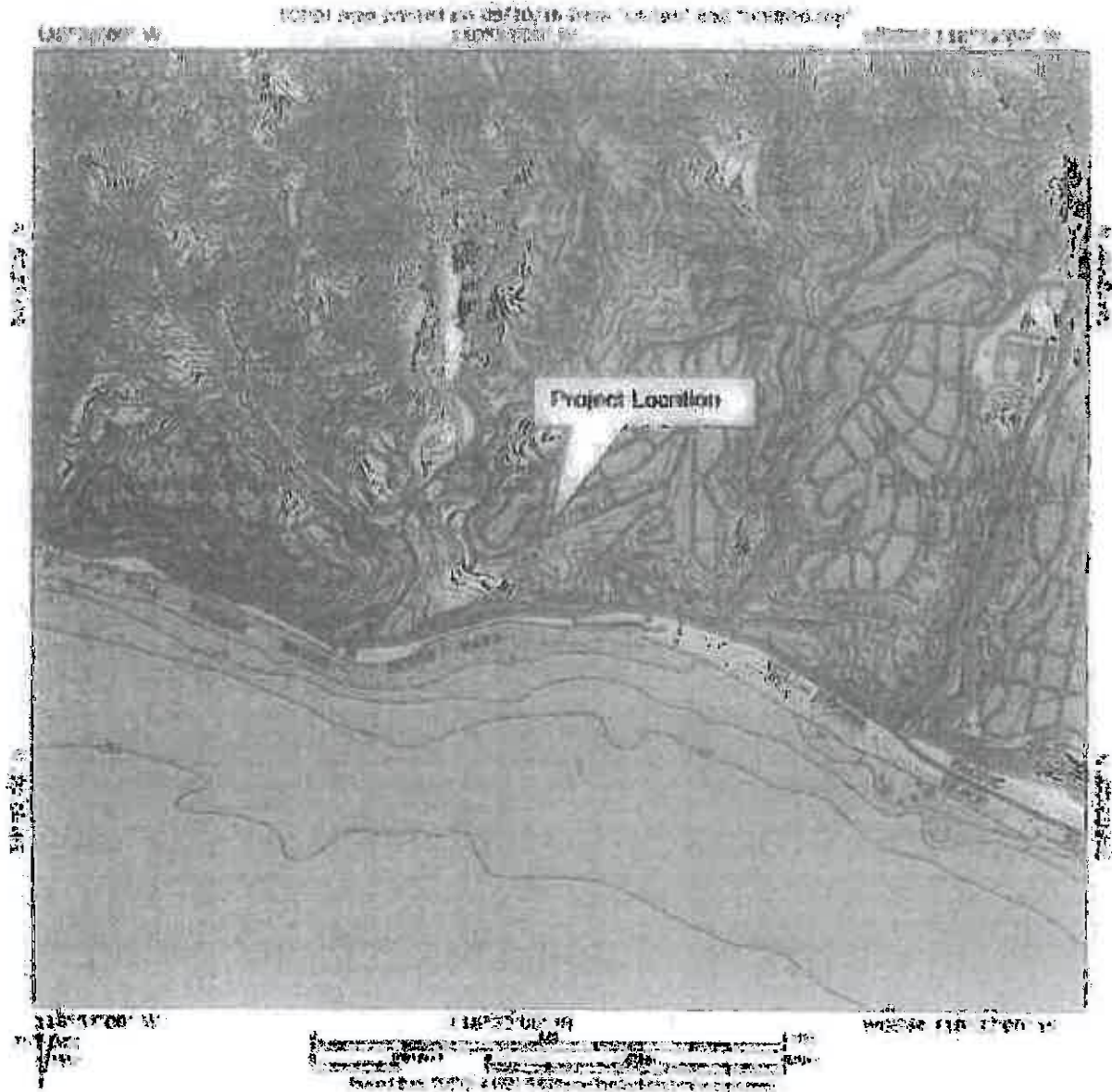


Figure 1. Aerial map

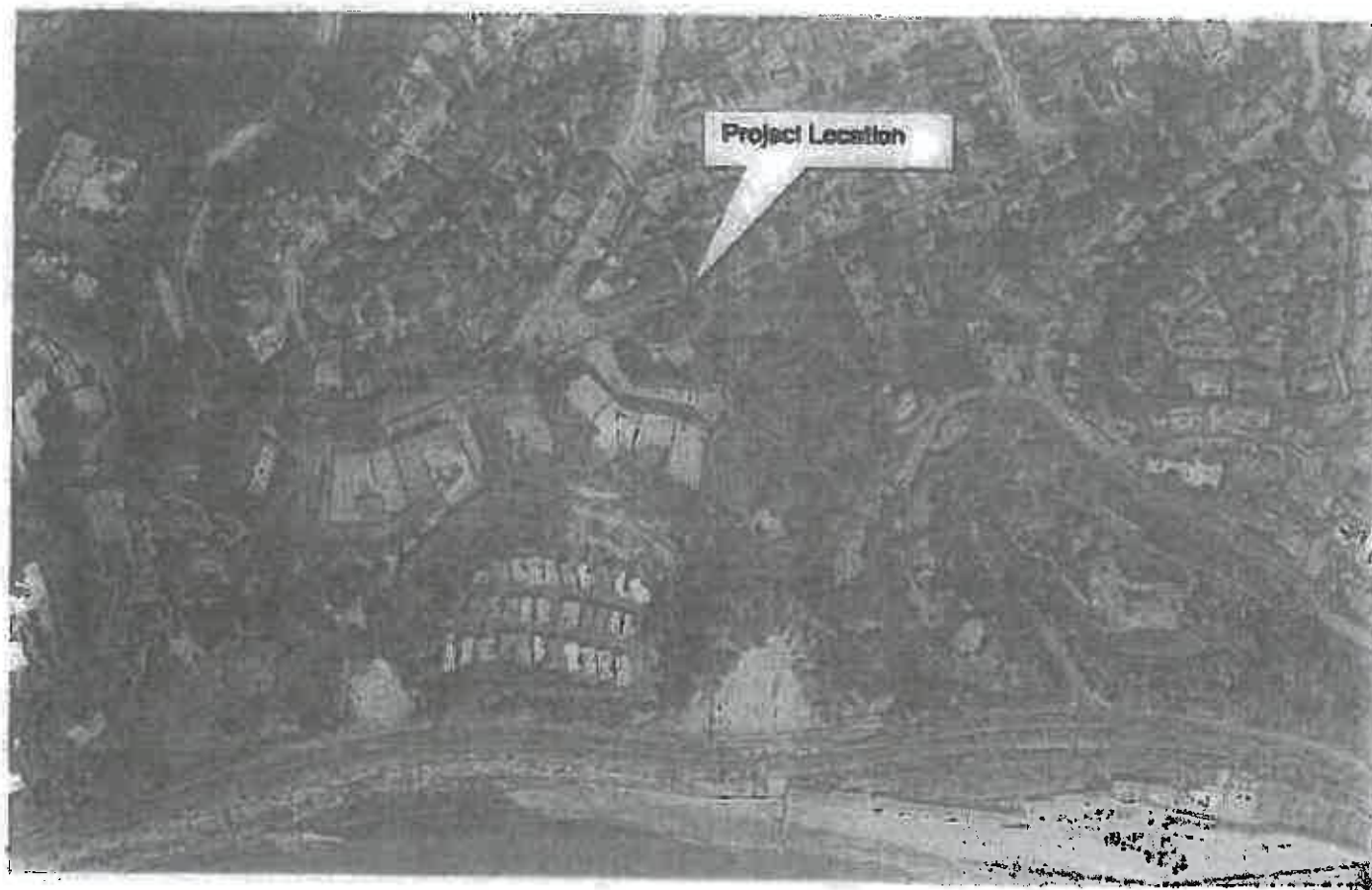


Figure 2. Aerial overview (Google Earth)

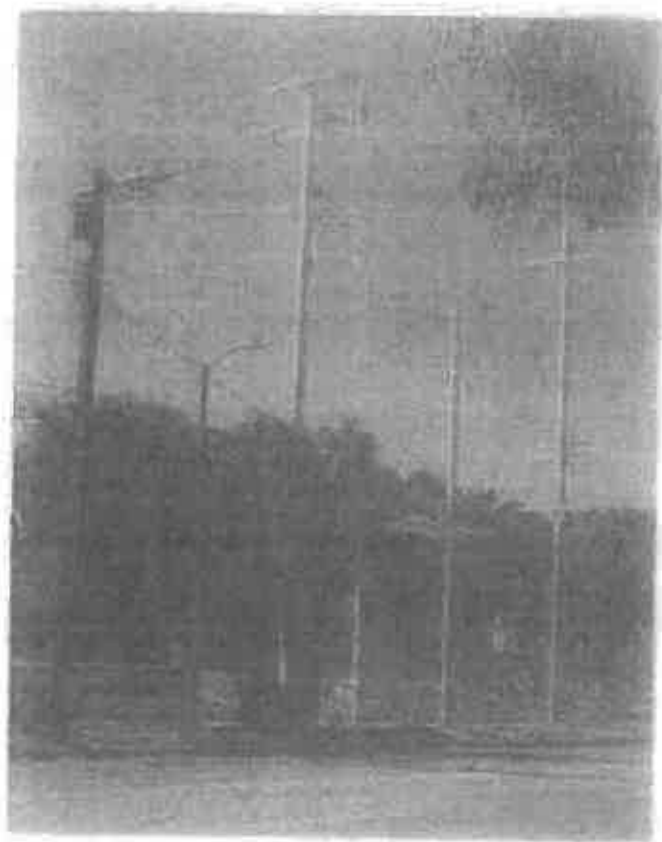
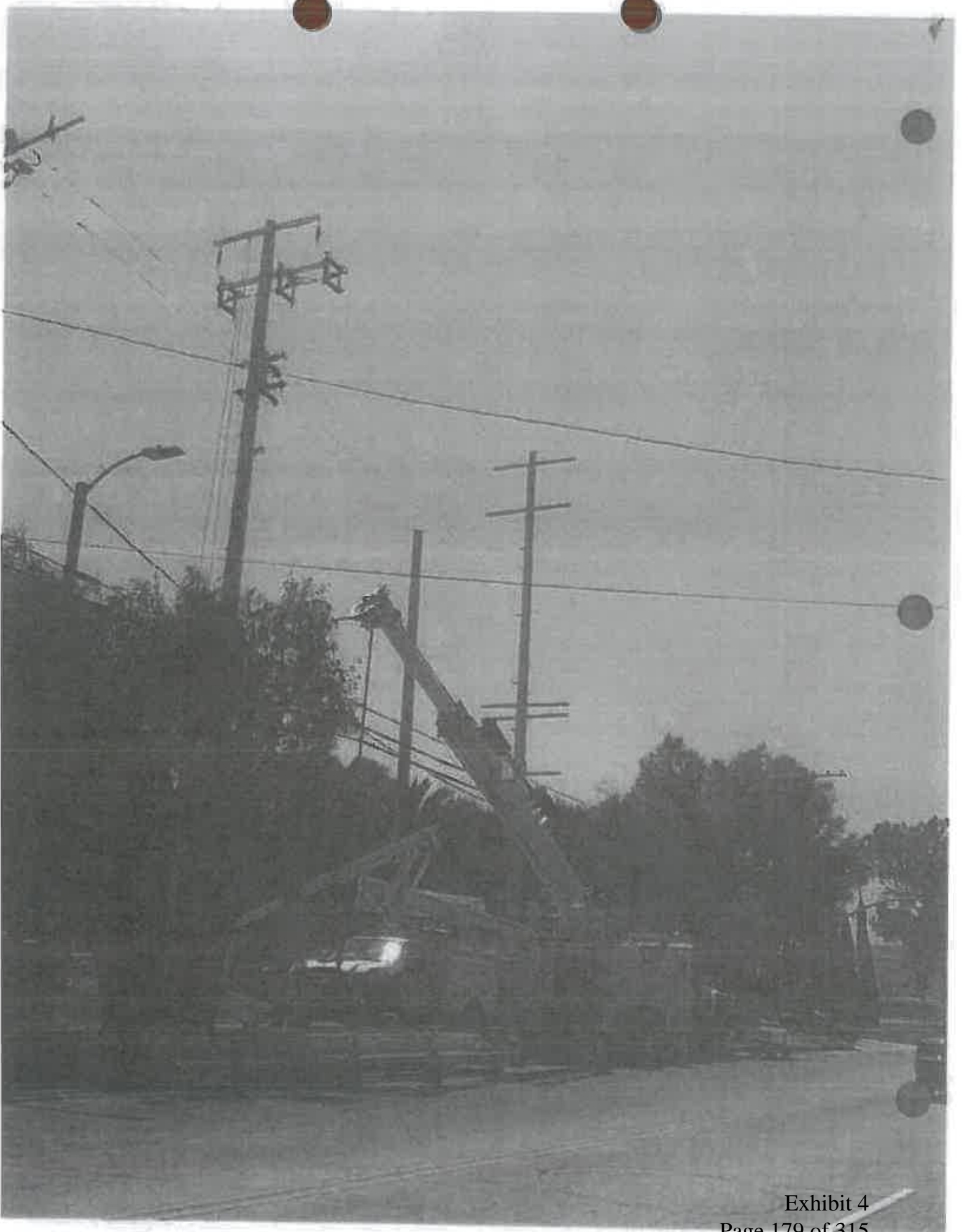


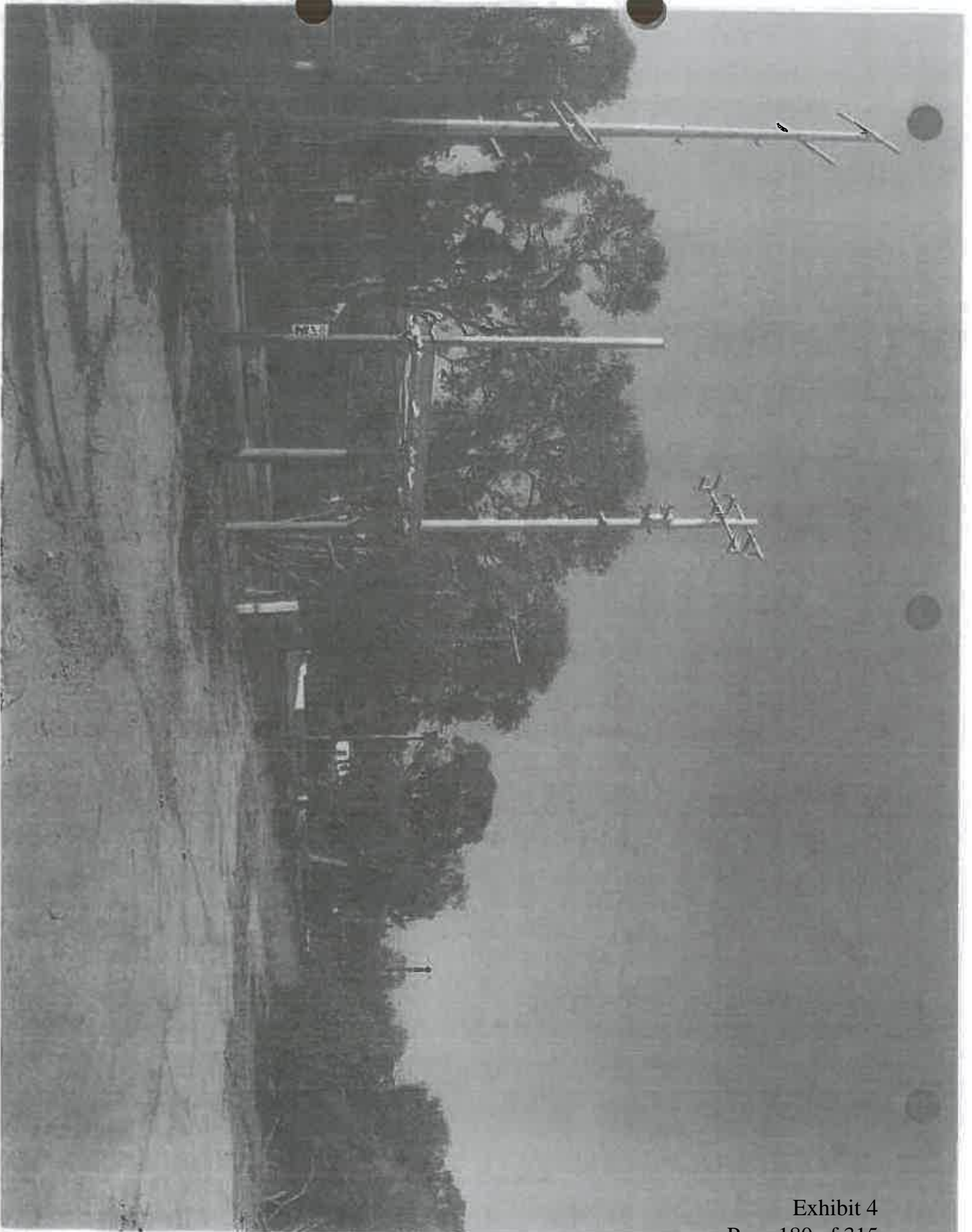
Figure 3. Sunset Blvd. looking west



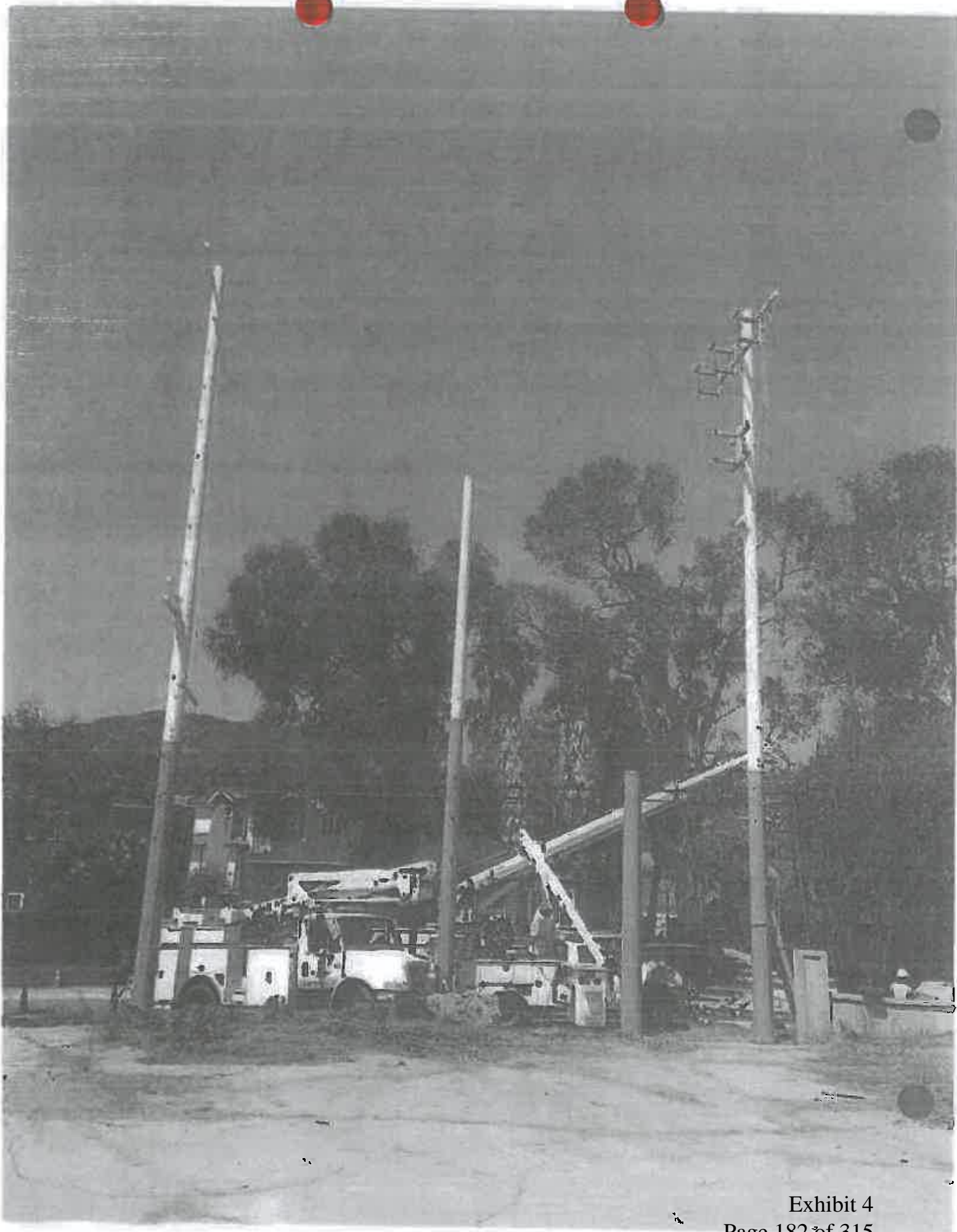
Figure 4. Sunset Blvd. looking east

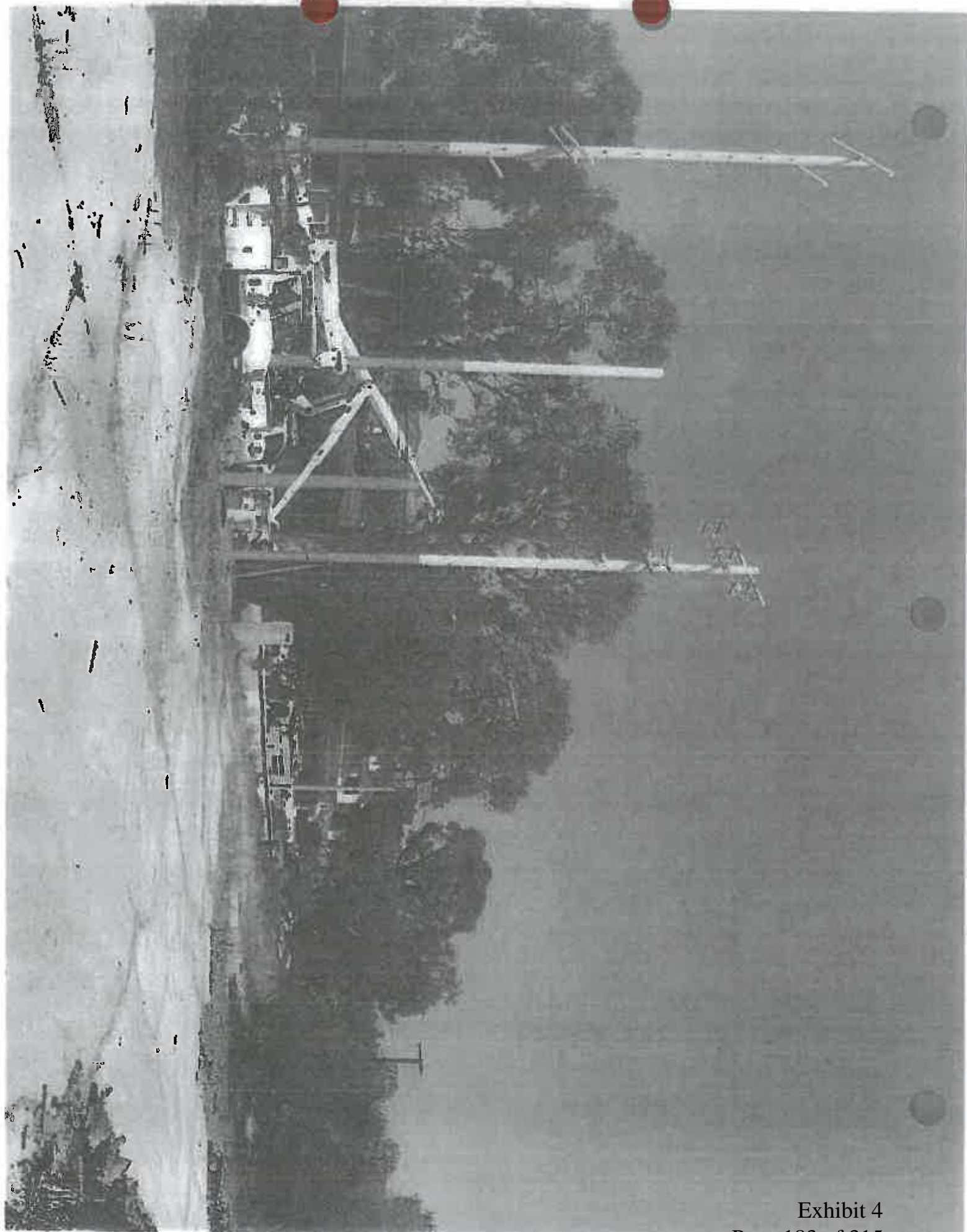
EXHIBIT “5”



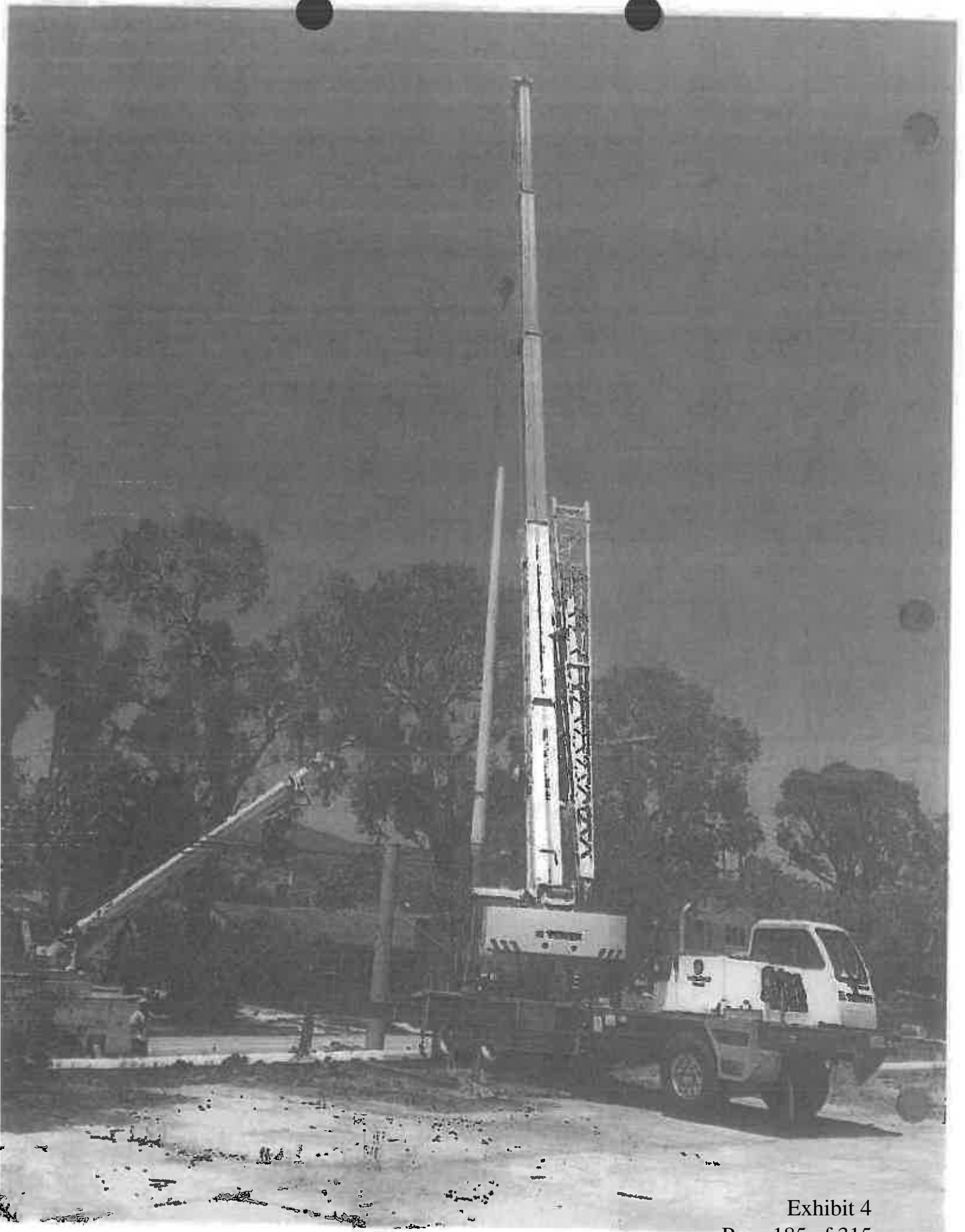






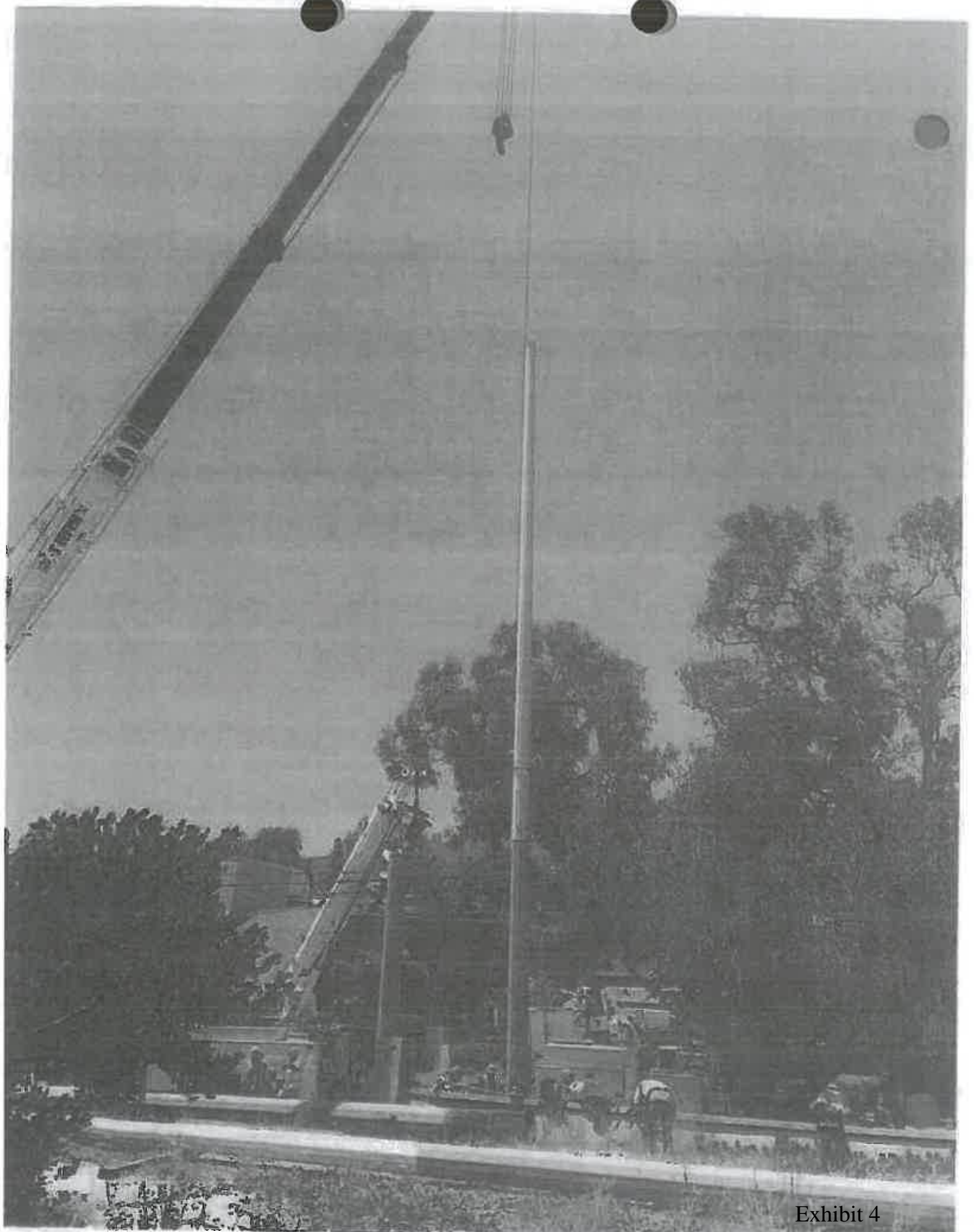












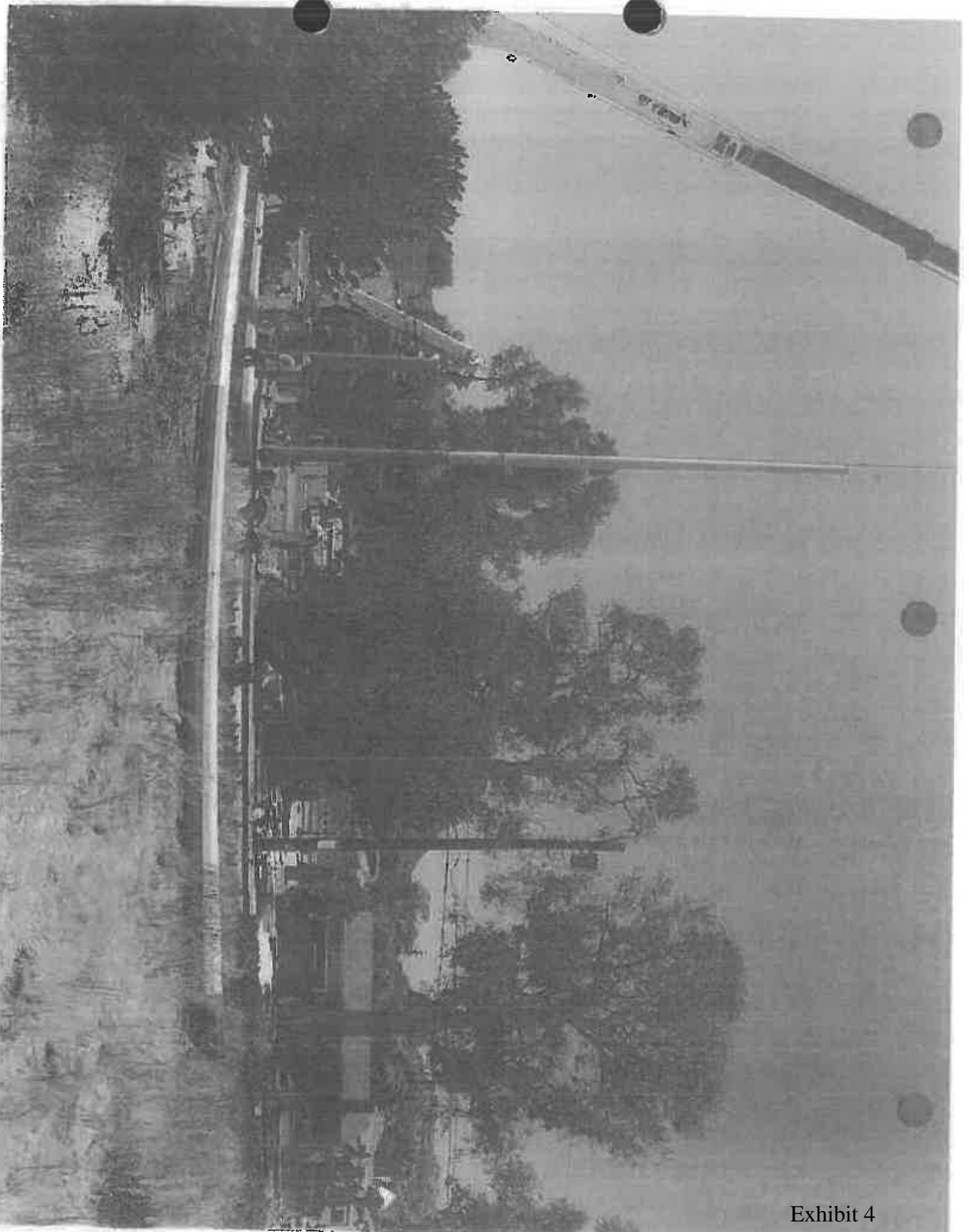


EXHIBIT “6”

Exhibit 6

Distributed Padmounted Substation Article published in IEEE

Distributed Padmounted Substations

Tom Nordrum
Senior Apparatus Engineer
Cooper Power Systems
P. O. Box 1130
Bozeman, MT 59771-1130 USA

Russell Zell
Senior Product Specialist, Transformer Products
Cooper Power Systems
1900 E. North Street
Waukesha, WI 53188 USA

Dave Peterson
Staff Engineer
Fall River Rural Electric Cooperative
1150 N. 3400 E.
Ashton, ID 83420 USA

Abstract - Electric utilities today face increased pressure compared to that faced just ten years ago. De-regulation of the utility industry has brought profitability and performance pressures from shareholders, public service commissions and customers. Recent advancements in padmounted electrical equipment now allow construction alternatives that did not exist when utilities originally created their standard substation designs. It is now possible to construct smaller, padmounted substations with underground sources and feeders. Benefits of this approach include reduced cost, easier construction approval, greater reliability, simplicity and flexibility of design, and improved safety and aesthetics. These benefits will be discussed in detail, with examples of completed installations.

Index Terms - Substation design, substation construction, padmounted equipment, padmounted transformers, padmounted switchgear, padmounted capacitor, voltage regulation.

1. INTRODUCTION

The business environment for utilities has changed substantially in the last ten years. De-regulation has forced utilities into a more competitive marketplace. Expenses are no longer automatically calculated into the customer rate base, and in some cases, customers have the opportunity to choose from whom they purchase power. As a result, utilities are re-examining their practices, from billing to construction. The recovery period for expenditures must be much shorter than it was previously.

Customer demands have also increased. User's precision electronics have raised reliability requirements. EMF and aesthetic considerations have made projects such as substation and transmission line construction much more difficult than it once was.

A. Traditional Substation

A traditional substation is shown in Fig. 1. It contains overhead incoming and outgoing lines, with open-air connections of switches, the transformer, regulators, capacitors, and breakers. The entire installation is fenced or walled in, and may also have a control house on the property. The capacity of such a product ranges from 5 to 100 MVA, with a primary voltage between 35 and 230 kV, and a secondary voltage 35 kV or lower. Although vital to the

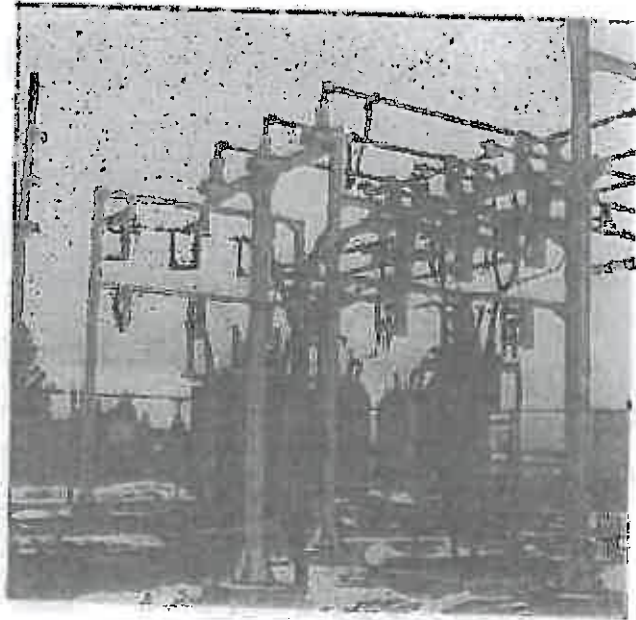


Fig. 1. Traditional Substation

electrical system, there is a negative public perception regarding the overhead lines, exposed connections, and potential EMF radiation. This perception can make permitting difficult or impossible.

B. Distributed Padmounted Substation

This paper's intent is to focus on "distributed padmounted substations". Just as the mix of generation on a utility system now includes an array of "distributed generation", a utility's substation base can apply a similar concept. Although there is no strict definition, these substations are usually defined as using an underground source to a small (10-20 MVA) substation. The underground source is either a higher (25 or 35 kV) distribution voltage or a transmission level voltage. The equipment is padmounted and deadfront. It is typically sited right at a new load growth or development area that cannot be served by the existing distribution system. It can be as simple as a collection of padmount equipment boxes, perhaps without a fence (see Example #1). If a higher distribution voltage is used for the source it can be an "express feeder" from an existing large substation, and need not be a voltage already on the utility's system. Since express

feeders serve no customers along the way, it is possible to use this unique voltage without truly introducing another service voltage to the utility.

Substations are not distributed today due to the high fixed cost of a traditional substation. The costs of fencing, real estate, excavation, and open buswork are not directly proportional to the MVA requirements of the station. Distributed substations become economically justifiable when they become padmounted. The individual stations can be sized for the load being added, and installed more easily and less expensively.

II. BENEFITS

1) *Cost:* It is difficult to compare costs of these two approaches to substations because of the differences between them. A traditional substation may have twice the capacity of a padmount installation, an elaborate relaying scheme, and a control building. Although a distributed padmounted substation may not even have a fence, it may have electronic, vacuum interruption high side protection versus simple power fuses in an overhead design (as shown in Fig.1).

Several projects for which costs were developed both ways to serve the same load indicate that a padmounted substation approach is often 35% less expensive than a traditional substation. Reduced material costs include no "take-off structure", possibly no fence or control building and less expensive power equipment. Total costs for a complete padmounted substation can be as little as \$350,000. Construction and design costs are reduced because both are greatly simplified. Property costs are reduced due to a more compact design and much smaller right-of-way. In some situations, just the value of deferring a large capital project to install a traditional substation can justify the construction of a distributed padmounted substation.

2) *Approval Process:* Overhead transmission right-of-ways may be difficult or impossible to obtain in some places. If an underground source is used, the right-of ways required are much narrower or may already exist. Public, government and regulatory review processes are simplified due the less obtrusive, clean underground design. Permitting may even be avoided altogether for some projects if only distribution voltages are involved. In addition, there are fewer EMF concerns with an entirely padmounted installation.

3) *Reliability:* Service reliability is improved since there is no exposure to weather. Underground construction avoids ice and wind problems, and the entire installation is shielded from lightning. Wildlife problems are greatly reduced with no exposed energized parts. Outage restoration is quicker because spare equipment is easily transportable and relatively lightweight. Utilizing single-phase regulators (which can be bypassed) instead of transformer LTCs contributes to a

design that can be operated with fewer outages. Additionally, regulators monitor and correct each phase voltage individually. This leads to improved regulation of feeders with substantial single-phase load.

4) *Simplicity and Flexibility:* The simplicity and flexibility of the distributed padmounted substation is in its "building block" approach. Much of the equipment is available as standard distribution equipment and in many different configurations. These standard blocks can be laid out to create a customized design by simply connecting different blocks. This results in a two-dimensional design that a distribution planning engineer can manage. Substation design engineers are then freed up to focus on more complex work instead. The flexibility of the building blocks yields some very different designs as shown in the attached examples.

Using typical distribution equipment means that distribution crews may construct and maintain a padmounted substation. It is a big advantage for some utilities to have distribution crews (contracted or in-house) able to complete this work (see Fig. 2). The simple design and construction of these substations with common padmounted equipment results in relatively short timelines, allowing utilities to complete projects more quickly and consistently.

There is also the flexibility to incorporate only part of this entire concept on a project. Example #4 utilizes a typical overhead transmission line source, with the rest of the substation built from padmounted components. In this example, existing overhead right-of-way and the proximity of nearby 46 kV overhead lines made this method the most cost effective.



Fig. 2. Distribution Personnel Installing Padmounted Substation

5) *Safety:* The safety of a padmounted substation is increased because all equipment is deadfront; no exposed energized parts exist. The equipment is also all hot-stick-operable and tamper-resistant. This offers no more risk to the public than the padmounted transformers installed in some customers' backyards. This degree of safety makes padmounted substations safer for operating personnel, the public and wildlife. The substation shown in Example #1 is near a ski area, which commonly has 10 feet of snow on the

ground. An energized bus at such a location could be a hazard because both people and wildlife frequent the area.

6) *Aesthetics*: A completed distributed padmounted substation looks like a clean collection of boxes in a field. The low profile and underground design are pleasing to the eye. This makes them a better fit in residential areas or especially at upscale resorts and environmentally sensitive areas.

III. EQUIPMENT

Expansion of the product scope of padmounted equipment over the last twenty years now makes an entirely padmounted substation installation viable. All products listed below can be designed and certified to meet the tamper-resistance criteria set forth in ANSI C57.12.28 - 1999 [1]. It is common practice to install equipment meeting this standard without any additional tamper protection (i.e. fence, enclosure, walls.)

1) *Transformers*: Padmounted transformers as large as 10 MVA are now available. Primary voltages up to 69 kV are possible, and units with secondary voltages from 4 kV to 25 kV can be designed to accommodate 1200 amps of secondary line current. The paralleling of two or more of these transformers enhances reliability. The total MVA of the station will be determined by load data and load projections. By dividing the required kVA amongst multiple units, the loss of a transformer does not mean a long-term outage. The load can likely be carried by the remaining units, at least until loads have grown into the original projections.

For primary voltages up to 35 kV, integral primary overcurrent protection is available for these large padmounted transformers. A vacuum interrupter can be built into the transformer tank, providing overload and fault protection. This device typically has an interruption rating of 12 kA. This rating can sometimes be increased to 50 kA by the addition of partial-range current-limiting fusing in series with the interrupter, depending on the exact voltage and current ratings required.

2) *Connectors*: Deadfront primary connectors are common and modestly priced for units with primary voltages up to 35 kV. 600 amp deadfront connectors are commonly used to connect the various pieces of equipment in the substation. These connectors can be certified to 900A operation with the use of all copper components. Deadfront primary connectors are available for 46 kV and 69 kV applications as well. The cost of such connectors is substantial (over \$1500 per bushing connection), but if underground 46 kV or 69 kV cable is already a requirement of the installation, this connection method may prove to be the most economical.

3) *Switchgear*: Padmounted switchgear may be used to accomplish all the switching needs in a substation. The many

configurations offered provide a lot of flexibility. They can substitute as a bus and can even provide a bus tie switch (shown in all of the examples). Using vacuum switches, they allow either automatic or manual transfer from a preferred to an alternate source. These switches have fault current ratings of 12-16 kA. Continuous current ratings of 600 amps are common, and units capable of carrying 800 amps are possible.

Padmounted switchgear with overcurrent protection can be used for high side protection and/or outgoing feeder protection. Multiple feeders may be protected by a single piece of vacuum interrupter gear, utilizing an industry-standard configuration. If feeders leaving the substation become overhead lines at some point, padmounted vacuum reclosers can be installed to offer transient fault protection. Micro-processor based controls in these devices provide precision control of TCC curve profile and minimum trip levels.

4) *Regulators*: Voltage control for a padmounted substation is available by using padmounted single-phase step-voltage regulators (see Fig. 3). These devices contain the same components used in structure-mounted substation regulators, except that the source, load, and source-load bushings are deadfront style, capable of carrying up to 600 amps. Single-phase regulators offer independent phase voltage control, and bypass/replacement without service interruption to customers, unlike LTC voltage control on a power transformer.

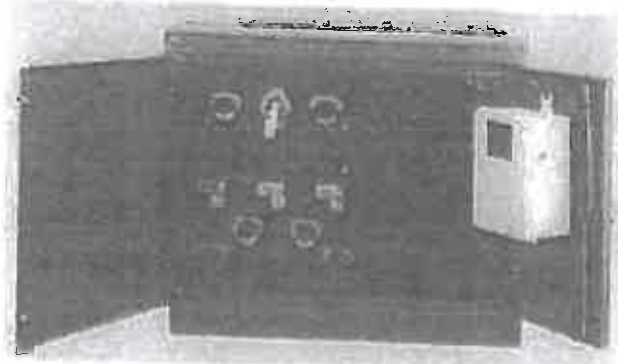


Fig. 3. Padmounted Regulator

5) *Capacitors*: Feeder power-factor correction may also be handled within the padmounted substation since several vendors supply padmounted capacitor banks.

6) *Reactors*: If a reduction in the available fault current is required, it is possible to install padmounted reactors as part of the substation.

7) *Automation*: Microprocessor-based controls for regulators, reclosers and switchgear offer many modern

features. These automation capabilities and intelligence are "distributed" out to the individual control boxes, potentially eliminating the need for a control house or dispatch operator involvement.

Some of the available features include:

Individual feeder metering capability
Graphical logic programming and oscillography
Digital or Analog SCADA communication and control

IV. LIMITATIONS

1) *KVA Size*: This application lends itself to the 5 - 20 MVA range. If MVA requirements are larger than that, equipment and load flow problems exist. Padmount transformers are available up to 10MVA (paralleled to obtain 20MVA). The regulators are available up to 600 amps. Carrying loads larger than 20 MVA for any considerable distance is difficult using a distribution voltage.

2) *Primary Voltage Level*: 35 kV may be considered a maximum for several reasons. High side protection equipment is difficult to find in a deadfront, padmounted package above 35 kV. The switching equipment and deadfront terminations are also much more affordable at 35 kV and below. Deadfront arresters are available up to 35 kV. These issues may create an incentive to use a higher-distribution voltage express feeder (35 kV or less) so that distribution-class equipment and terminations can be used.

If a radial, express feeder is used, then the overcurrent protection at the origin of that line can act as both line protection and high side protection to the distributed substation. This would eliminate the need of a high side protection device in the padmounted substation, and would promote the use of 46 or 69 kV as the express feeder voltage.

3) *Fault Current*: Although some padmounted equipment is available with an interrupting rating of 16 kA, the majority of padmount switching equipment is limited to a 12 kA interrupt rating. If required, padmount reactors may be installed, or higher fault-current withstand switches may be available. If the transformer is the first piece of gear in the installation (as shown in Example 4), fault current to the switches is limited by the transformer impedance.

V. APPLICATIONS

The distributed padmounted substation is not a concept that replaces the traditional substation as a standard. It should be considered as an option for specific projects, where a traditional substation may not be the best fit. As a niche application, it has proven to be attractive to even large utilities. Some common applications of this concept include:

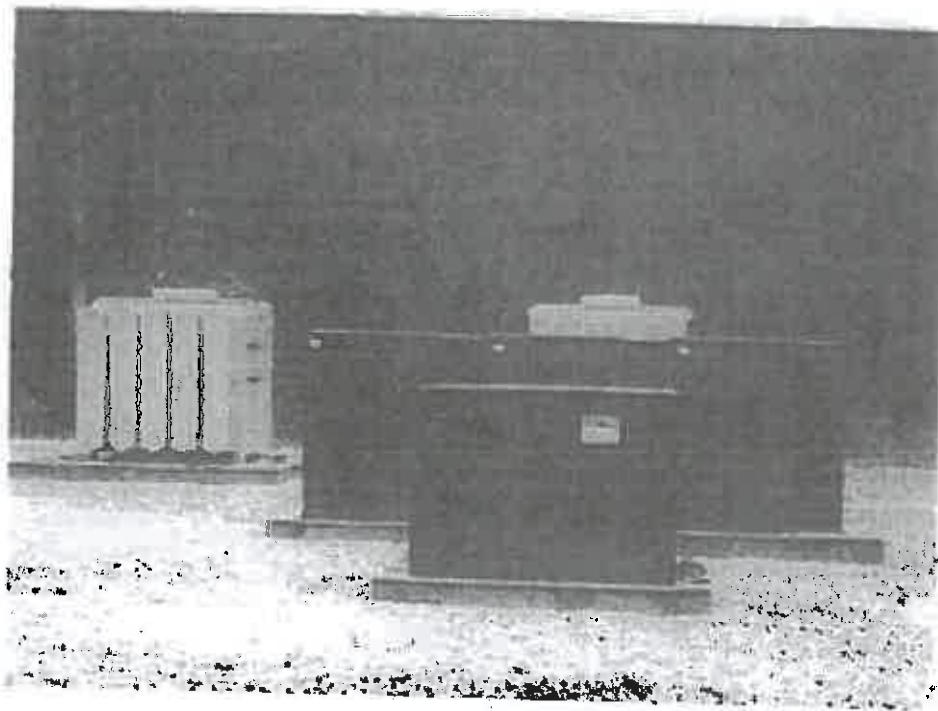
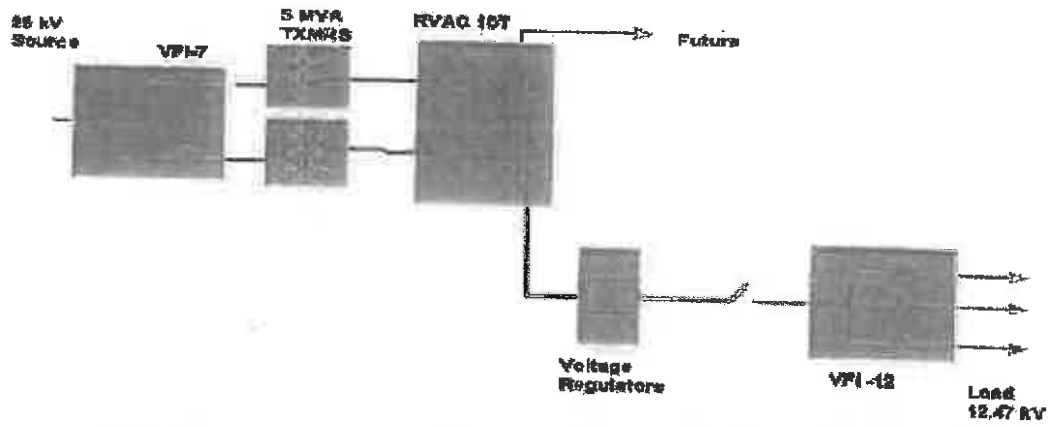
Exclusive Resorts - Aesthetics are very important at upscale resorts where property prices are high. Many of these customers demand underground construction anyway. Resorts are quite often large loads in isolated locations, making a good fit for the express feeder concept (see Example #1).

Stepdown Applications - The distributed padmounted design can conveniently be used to create a stepdown substation. These are used to interconnect different distribution systems versus installing a new high voltage transmission substation (see Example #3).

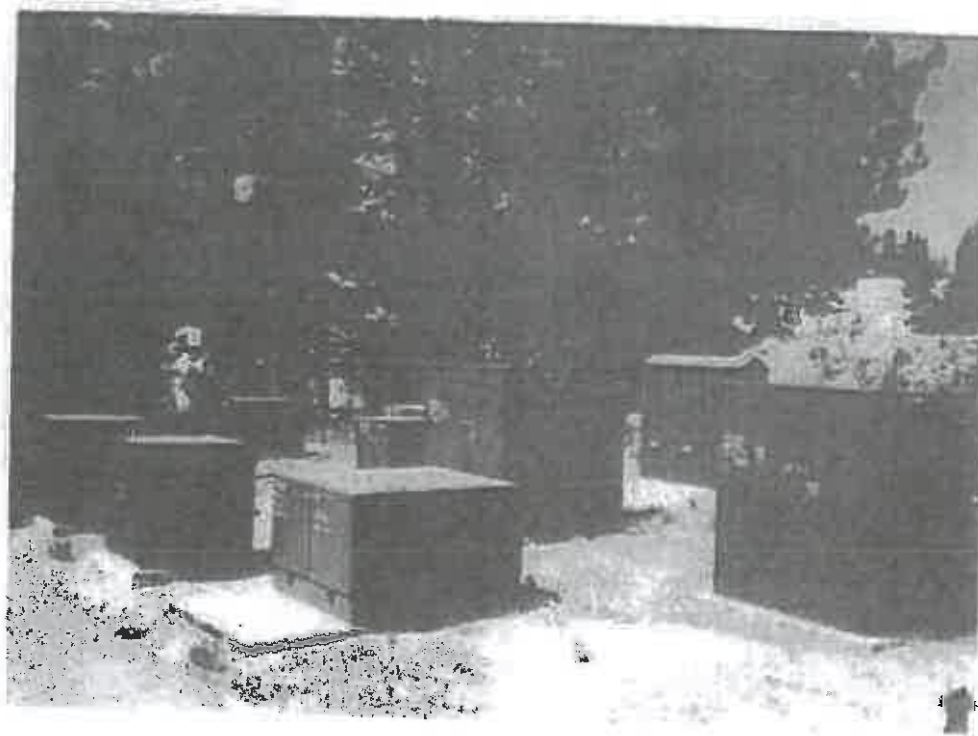
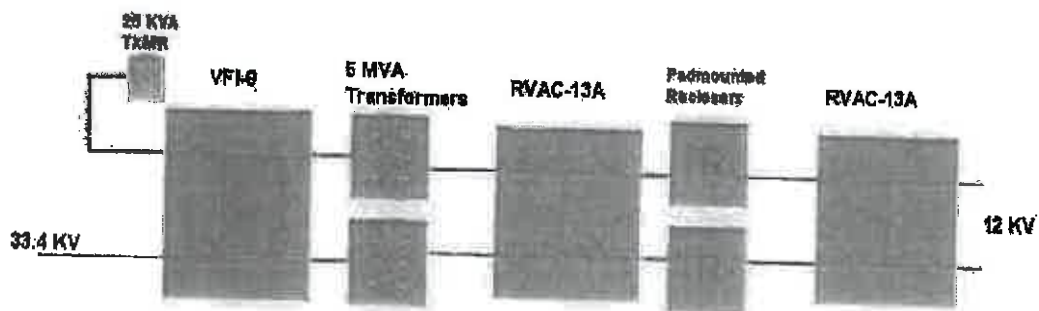
Extreme Climates - Applications at ski areas, coastal areas, and high contamination areas (salt or highway de-icing agent) are all good applications.

Environmentally Sensitive Areas - Places such as State or National Parks and other highly scenic areas are good candidates. Even some residential neighborhoods have aesthetic requirements that justify this type of construction.

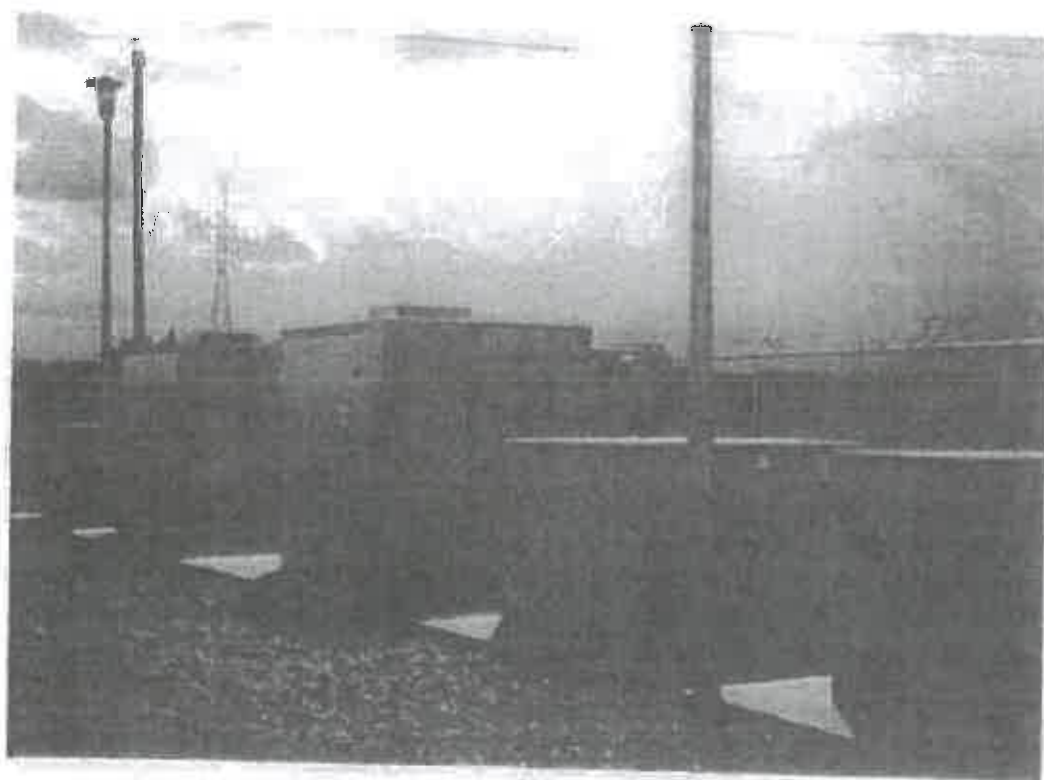
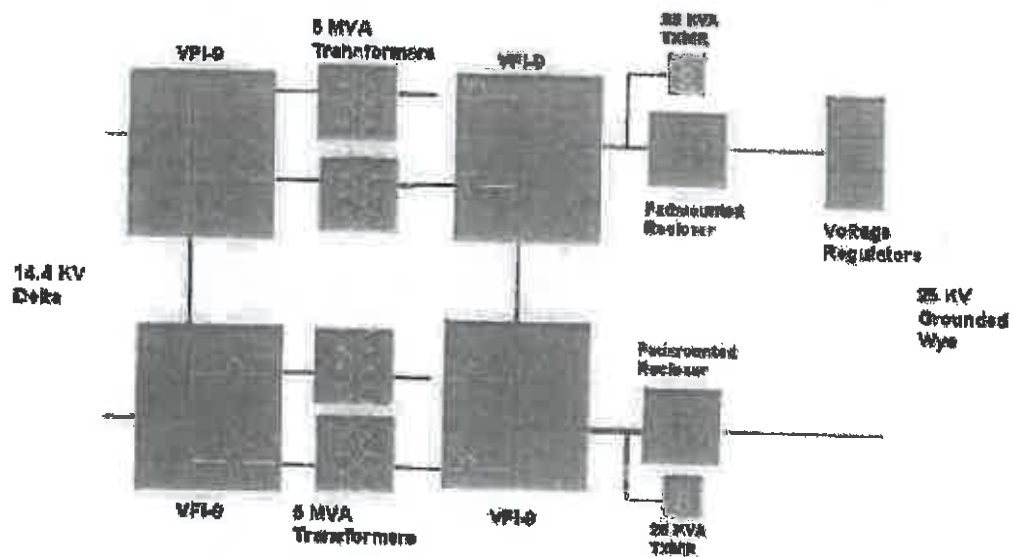
EXAMPLES



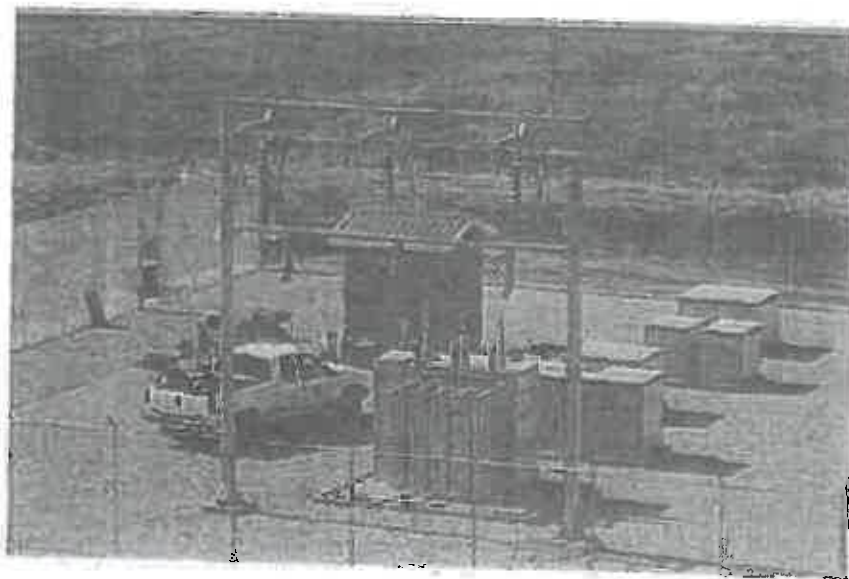
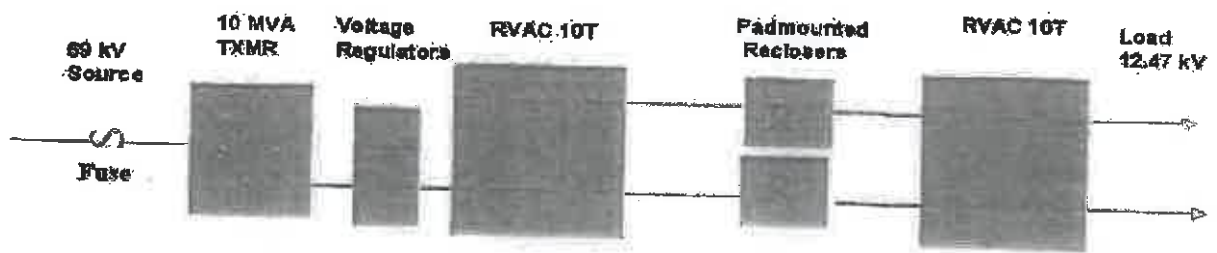
Example 1



Example 2



Example 3



Example 4

VI. CONCLUSION

Distributed padmounted substations have benefitted those utilities who have installed them. Placing only the required MVA of substation in close proximity to the load requiring it postpones or eliminates the need to install a larger, traditional substation.

There are numerous benefits as compared to a traditional substation. The benefits include:

- Decreased costs (often 35%).

- Construction approval is easier, due to narrower right-of-ways and improved aesthetics.

- Greater reliability, due to reduced exposure to extreme weather.

- Simplicity and flexibility of design, due to two-dimensional "building block" approach.

- Improved safety, due to deadfront construction and underground cable connections.

- Improved aesthetics, due to the lower profile and unobtrusive appearance of padmounted equipment.

The application of this concept is limited by the voltage and ampacity limits of padmounted equipment. A 20 MVA installation is the practical maximum size, with a maximum primary voltage of 69 kV. The available fault current on the secondary side (and perhaps the primary side, depending on the design) of the installation must be kept below 12 kA.

Some particularly good applications for this concept are near resorts, in extreme climates, in environmentally sensitive areas, or as a connection point between distributions systems.

REFERENCES

- [1] American National Standard for Switchgear and Transformers - Pad-Mounted Equipment - Enclosure Integrity, ANSI/IEEE C57.12.28-1999.

BIOGRAPHIES

Tom Nordrum is a Senior Apparatus Engineer for Cooper Power Systems. He has worked for Cooper Power Systems for 11 years and lives in Bozeman MT. Previous to this Tom worked for Pacific Gas & Electric for 8 years as a Planning Engineer. He received a B.S. in EE from Montana State University in 1982. Tom is a licensed professional engineer in Montana and California.

Russell Zell is a Senior Product Specialist for the Transformer Products Division of Cooper Power Systems. He has worked in marketing for six years, and in engineering for three years previous to that. He lives in Wales, WI. He received his BS in ME from Valparaiso University in 1993.

Dave Peterson is the Staff Engineer for Fall River Rural Electric Cooperative in Ashton, Idaho. He received his B.S. in ELET from Montana State University in 1985. Dave has worked for Fall River Electric for 16 years.

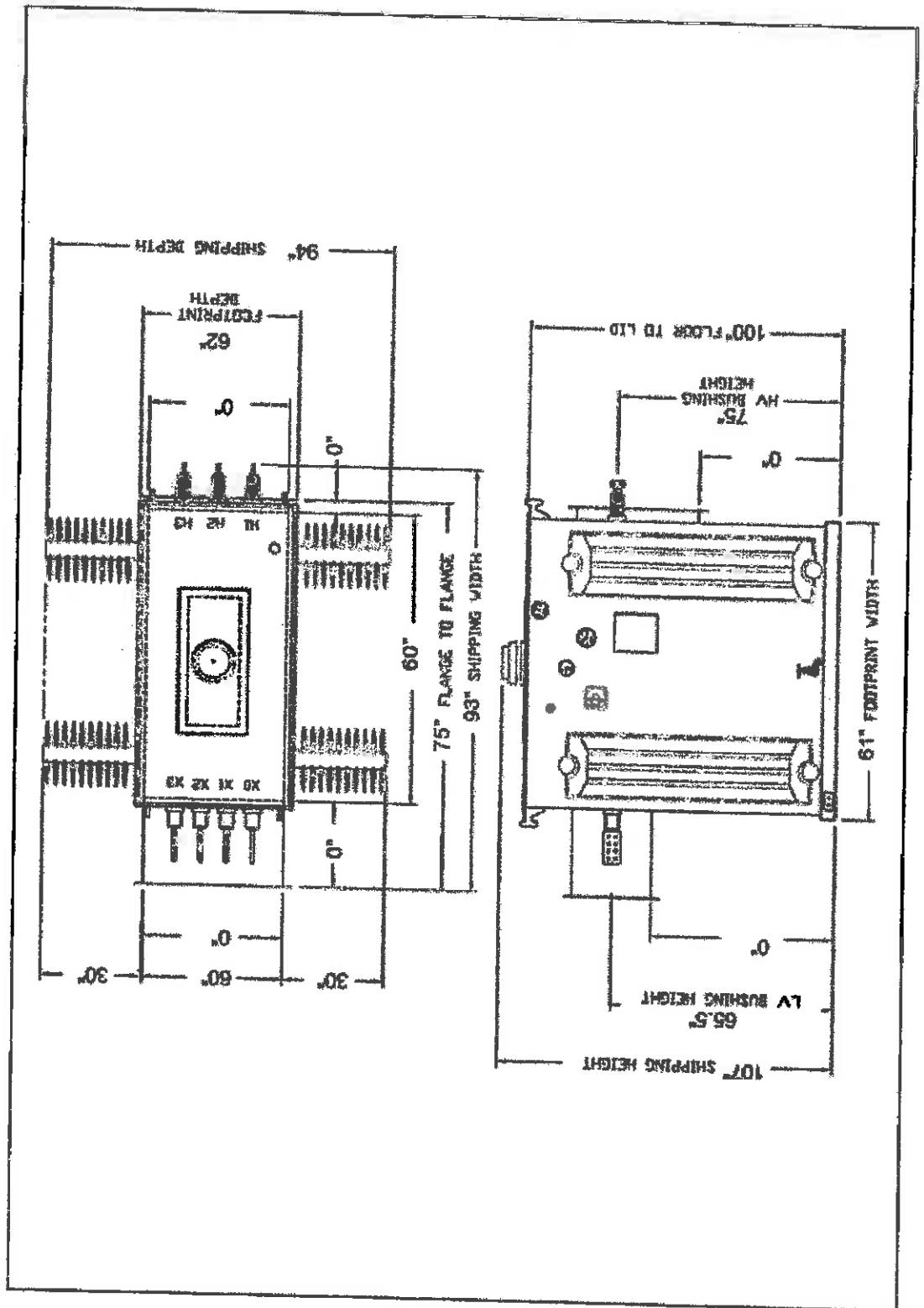
EXHIBIT “7”

Exhibit 7

Schematic for the Padmounted Distribution Station and The Summary Report of the consultants

MADDOX INDUSTRIAL TRANSFORMER

General Purpose Drawing / Not for Construction





QUOTE # SO-12980

Date: 12/02/2016

Pay Terms: Payment with Order

Reference:

www.maddoxtransformer.com
sales@maddoxtransformer.com
800-270-2011

Quote To:
Integrated Environmental Technologies

Ship To:

#	Description	Qty	Price	Amount
1	<ul style="list-style-type: none"> • New 2500 kVA 3-Ph Substation Transformer High Voltage: 34500 Delta Low Voltage: 4800 Delta HV Taps: 2 - 2.5% Above and Below Fluid: Mineral Oil Frequency: 60 Hz Temperature Rise: 65°C Features and Accessories -Standard PRV -Drain Valve with Sampler -Liquid Level -Thermometer 	1.0	38,005.00 Each	38,005.00
Lead-time: Ships within 12 - 14 weeks ARO				
2	Freight Allowed: Transportation within contiguous U.S. via LTL truck (5-7 day service) will be paid by MIT.	1.0	0.00 Each	0.00
3	3 Year Warranty	1.0	0.00 Each	0.00

Quote Lines		Additional Cost		Total Quote	
Before Tax	38,005.00	Before Tax	0.00	Before Tax	38,005.00
Tax	0.00	Tax	0.00	Tax	0.00
Total	38,005.00	Total	0.00	Total	38,005.00

Notes:

Prices valid for 30 days. Subject to prior sale. Payment terms offered on this quote are contingent on an established account in good standing. SALES TAXES, if applicable, may be added unless an exemption certificate is provided with purchase order. Enclosed photos may not represent finished product. Made-to-Order units are not refundable. Maddox Industrial Transformer's Standard Terms & Conditions apply, see details at: www.maddoxtransformer.com/documents

Printed: 12/02/2016

November 8, 2016

**Analysis of LADWP Coastal Permit Application 16-14 and Underground and
Padmounted Alternatives
By Integrated Environmental Technologies (IET)**

INTRODUCTION

Sunset Boulevard is a Scenic Highway. Thousands of people travel this route either out of necessity or for pleasure. This includes tourists and Southern Californians, who love to travel this route just for the pure enjoyment of driving down "Sunset Blvd."

Placing a Pole Top Distribution Station (PTDS) in proximity to Sunset is not in keeping with a Scenic Highway. The distribution sub-station should be placed underground to the "maximum extent feasible" or pad-mounted with appropriate screening. Nowhere in the application or staff report show that the LADWP actually undertook an actual analysis to place the distribution station underground, other than to say that it would be complex and water intrusion issues do exist. However, pad-mounted technology exists, which keeps vital equipment above ground, without water intrusion. Attached hereto as Exhibit "A" is a CAD schematic of a pad-mounted solution which includes the specifications for the pad-mounted equipment with equivalent service and performance parameters as the PTDS proposed by the LADWP. The LADWP did not consider a pad-mounted station at all.

The General Plan also provides that where undergrounding is not feasible, then the utilities should be screened. Painting the poles is not screening.

Planning the distribution at grade with a fence and landscaping is screening.

AESTHETICS

- This neighborhood is very concerned about the quality of life, views, and community values.
- The large pole top facility in this area would be a blight on the area.
- Are there any other areas where this would less visible?
- Sunset is designated as a scenic road, with a 500' area of protection.
- LADWP stated there is not sufficient room for undergrounding, but the LADWP did not look at the Pad-mounted distribution station solution at all.

COST

- LADWP has said that undergrounding would be more expensive, but has not shown an actual cost review and the LADWP did not review pad-mounted equipment at all.
- LADWP states that they have delayed a permanent new station, due to their lack of action, but they will spend funds for a temporary fix. If the LADWP is going to spend funds on a fix which although temporary could be there for a few years, it should be done correctly and a pad-mounted distribution station is a superior solution.
- Although the LADWP has various policies which impact the cost of a project like the PTDS or a pad-mounted alternative, based on our experience in the area, we believe that the pad-mounted alternative set forth in Exhibit A could be constructed for approximately \$100,000.00 (this would be an approximate cost if constructed by a private utility service).

SAFETY

- Pole top equipment is more exposed to weather and nature.
- Pad mounts are more reliable, particularly with coastal air/weather, and no exposed electrical parts.

- Electro Magnetic Fields (EMF) concerns on the new installation are less with a pad-mounted system.

SCHEDULE

- The briefing document from LADWP states that the PTDS is needed by the summer of 2016. However, it is now November and the LADWP made it through the summer of 2016, so it appears that it is not an emergency or a project that is needed on a rush basis as originally stated.
- LADWP states that this is temporary, until a permanent station can be built. However, they do not give an end date. In fact, a permanent station could take a decade or more to complete. What is the actual schedule? A pad-mounted solution would be preferable in the event that the distribution station needs to be in use for more than a couple of years.

COMMUNITY PARTNERSHIP

- Time should be allowed to build a community consensus and partnership.
- The neighboring properties, school, local community, Community Council, and Council Office should all be involved in the solution with LADWP.
- There can also be longer term benefits to this partnership related to locating the actual substation that the LADWP intends to construct.

RECOMMENDATIONS

- The PTDS should be relocated or installed underground or at a minimum pad-mounted and appropriately screened with landscaping or fencing in order to blend into the scenery and be consistent with the residential character and coastal location of the same.
- Exhibit A is a design of a potential pad-mounted distribution station that should be considered by the LADWP.

EXHIBIT “8”

Exhibit 8

Poyray-Electrical Article

Electric Works of Zurich Oerlikon Substation

The rising demand for electricity and a need for a continuously stable power supply were the driving forces behind the decision to build a new substation in the city of Zurich.



BACKGROUND

Zurich is a booming city and one of the most rapidly growing in Switzerland. The power grid needs to be stable and produce enough capacity to provide energy consistently to the more than 400,000 residents of Zurich. To expand that capacity, the Electric Works of Zurich, or ewz, launched a project to create a substation that would convert voltage from 150kv to 22kv – a more modern standard. The structure was slated to be located in a part of the city called, Oerlikon, hence the name of the substation.

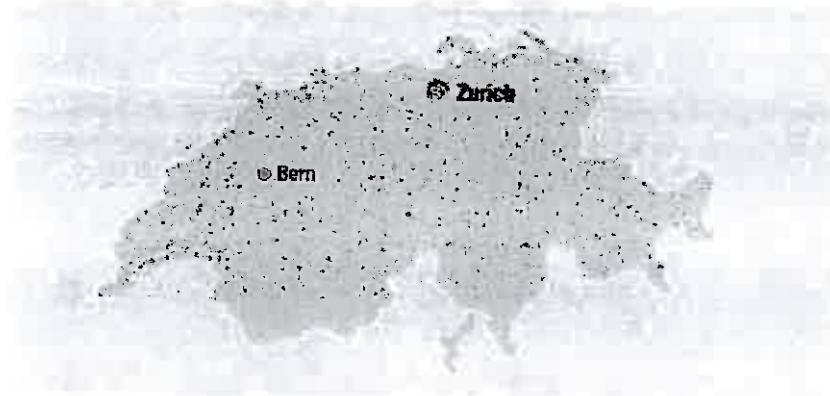
CURRENT CHALLENGE

Because land is scarce in Zurich, ewz was challenged to construct the Oerlikon substation three stories

underground. And they designed a building to sit on top of the site that would include space for offices with cloakrooms, training facilities and common rooms for more than 40 Electric Works employees. And, since most of the structure would be subterranean, the project demanded the very best civil engineering. Among other challenges the project posed, the construction site was problematic given the region's poor subsoil and high-level groundwater. Making the substation waterproof was, needless to say, critical. After releasing a public tender for the project, ewz chose Pöyry as the general planner, given the broad range of expertise needed to pull off such a technically demanding project.

Because Pöyry possesses a range of skills – from surveying to engineering and everything in between – there was no need to run fractured communications between a number of disconnected parties. That helped with the speed of the construction, which Pöyry delivered on time and on budget despite the challenges with groundwater.

According to Pascal Mueller, General Project Manager for ewz, "A project this complex involves a lot of challenges in terms of geological and design issues. We left safer with Pöyry. They were able to achieve highly ambitious goals on an extremely tight schedule and under very difficult conditions."



CHALLENGE

Pöyry began work on the underground substation that had a number of special features. One of those included a viewing area that would allow visitors from the building above to look through a glass enclosure to see the switchgears at work below. Pöyry also faced the challenge of implementing the complex waste heat utilisation system for the transformers.

To contain the ground water surrounding the structure, Pöyry designed a double wall structure to ensure safe operations at Oerlikon. At different periods during the execution of Oerlikon, teams of up to 20 project managers, engineers and other technical staff from Pöyry were dedicated to the project.

BENEFITS

Besides providing Zurich with a more consistent power source for the next 100 years and beyond, the Oerlikon substation is also reducing CO₂ consumption for future generations. Traditional insulation for switchgears calls for environmentally harmful sulfur hexafluoride (SF₆) gas. But the Oerlikon substation will use a new type of insulating gas technology (developed and delivered by ABB.) This innovative approach will lower greenhouse gases by up to 50 percent through the lifecycle of the switchgear used at Oerlikon. And thanks to the subterranean design of the substation, Zurich will get more power and more space for commercial and residential use. The site will also serve as a showcase for municipal government, allowing local residents to tour the substation or simply view in through the gallery.



Implementing balanced sustainability

Project Manager
Oerlikon Substation
Zurich, Switzerland

EXHIBIT “9”

Exhibit 9

Notice of Exemption

COUNTY CLERK'S USE

**CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT**

CITY CLERK'S USE

NOTICE OF EXEMPTION

(City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21160(d), the filing of this notice starts a 35-day statute of limitations on Court challenges to the approval of the project. Failure to file the notice results in the statute of limitations being extended to 180 days.

LEAD CITY AGENCY AND ADDRESS: Los Angeles Department of Water and Power (LADPW) 111 N. Hope Street, Room 1044 Los Angeles, CA 90012	COUNCIL DISTRICT 11
PROJECT TITLE Pole-Top Distribution Station Installations, Pacific Palisades Community	LOG REFERENCE

PROJECT LOCATION

Two pole-top distribution stations (PTD Stations) will be constructed at two sites in the Pacific Palisades community of the City of Los Angeles: (1) near the intersection of Sunset Boulevard at Marquez Avenue; and (2) near the intersection of Temescal Canyon at Sunset Boulevard.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The project consists of the construction of two temporary PTD Stations in the Pacific Palisades community of the City of Los Angeles. These PTD Stations are needed to temporarily relieve the worsening and on-going overloading of Distribution Station 29 and the three 4,800 volts circuits that currently serve the Pacific Palisades community. These temporary PTD Stations are needed until a permanent distribution station can be constructed and placed into service. Historical circuit data indicates that the existing system in the Pacific Palisades will not be able to suitably serve the community during heat storms predicted for the 2016 summer season. Once constructed, the PTD Stations will prevent power outages, limit outage durations, reduce fire risk associated with the overloaded circuits, and improve power quality for Pacific Palisades customers. Construction of the overhead components of the PTD Stations will take approximately two to three weeks. Construction for the underground portions of the PTD Stations will take additional time.

LEAD AGENCY CONTACT PERSON	AREA CODE TELEPHONE NUMBER EXT.
-----------------------------------	--

Charles C. Holloway, Manager of Environmental Planning and Assessment	213-367-1745
---	--------------

EXEMPT STATUS:

Categorical Exemption under CEQA Guidelines section 15303
Statutory Exemption under Public Resources Code section 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTIONS: The proposed installation of two PTD Stations in the Pacific Palisades community is exempt from review under the Class 3 categorical exemption for the construction of small structures, including "electrical . . . and other utility extensions, including street improvements, of reasonable length to serve such construction." (CEQA Guidelines, § 15303.) The proposed PTD Stations also qualify under the statutory exemption for emergency projects, since the installation of PTD Stations is necessary to prevent or reduce the frequency of significant and lengthy outages in the Pacific Palisades community, reduce the existing fire risk associated with the constant overloading of three circuits serving the area, and ensure that essential public services within the community are not without power. (Pub. Resources Code, § 21080(b)(4).)

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE <i>Charles C. Holloway</i> Charles C. Holloway	TITLE: Manager of Environmental Planning and Assessment	DATE May 25, 2016
FEE: \$75.00	RECEIPT NO.	REC'D BY
		DATE

DISTRIBUTION: (1) County Clerk (2) City Clerk (3) Agency Record
Form Gen. 152 (9/91) (Appendix A)

THIS NOTICE WAS POSTED

ON May 25 2016

UNTIL June 27 2016

2016 133291



FILED

May 28 2016

Don E. Logan, Registrar - Recorder/County Clerk

Exhibit 4

Recorder/County Clerk - Recorder/County Clerk

REGISTRAR - RECORDER/COUNTY CLERK

EXHIBIT “10”

Exhibit 10

Palisades News Article

PALISADES NEWS

Vol. 1, No. 14 • May 20, 2014

Uniting the Community with News, Features and Commentary

Circulation: 14,500 • \$1.00

See Page 71



Pacific Palisades resident Oliver, 8, packed with a 1931 Ford for his dad at Sunday's Community Expo 2013 (See story, Page 4).

Photo: Bert the Photographer

State Rejects DWP's Bid For Los Liones Property

By SUE PASCOE
Editor

The State of California has rejected LADWP's plea to buy state park land at Los Liones Gateway Park for the proposed Distributing Station 104 in western Pacific Palisades.

In a March 2 letter to the DWP, California Department of Parks and Recreation Superintendent Angeles District Craig Sap wrote: "We cannot support the sale of this important parcel of state park land for the industrial use you have imposed."

Sap also referenced letters dated October 2010 and February 2013, in which DWP had made a similar request, but the state had also rejected.

The superintendent said that before the CDPFR can sell any park land, it must first find that property is surplus. "Due to the acquisition history of the Los Liones parcel, the subsequent intense community involvement in its restoration and the sig-

nificant investment we have made in improvement and development of the entire site from the end of Los Liones Drive to Sunset Boulevard, it is impossible for us to make that finding."

Sap's four-page letter detailed the chronology of the site restoration and also noted that in addition to the DWP's attempt to purchase the land, prior attempts had been made by Temple Kehilat Israel and the Palisades-Malibu YMCA in 1991; The Four Square Church in 1999; and the Chabad of Pacific Palisades in 2009.

"Each time our response has been that the property is not surplus and cannot be sold for any other purpose than that for which it was acquired: recreation and trail access," Sap wrote.

He concluded: "In summary, CDPFR will not entertain the sale of a portion of lower Los Liones Canyon in Topanga State Park to the LADWP. Any further exploration of this option by the LADWP would be counterproductive to your goal of expeditiously serving your community's energy needs."

DWP spokesperson Carol Tucker was contacted by the *Palisades News* about the letter. "LADWP will be looking for alternate sites," she replied.

A new power distributing station is needed in the Palisades because the existing distributing station (DS 29), located at Via de la Paz and Sunset, is working at its capacity. According to the DWP, the station—built in 1937—will exceed its capacity within the next six years due to increasing electricity demand, which has grown particularly in the Marquez area.

After an outcry about the proposed station going on land owned by DWP next to Marquez Elementary School's lower yard, a 15-member task force was formed in cooperation with LAUSD and former City Councilman Bill Rosendahl's office. The group met biweekly starting in 2012 and identified 15 possible sites, placing the top four sites into tier one: two were near Paseo Miramar off Via Nichols, one was between the upper Bel-Air Bay Club and Malibu Village and the fourth was the old Bernheimer Gardens site off Sunset. Those sites were considered to have the lowest community impact.

The second tier of five sites, including the Los Liones park land, were considered alternate sites. The third tier of six sites were considered unacceptable and included the land owned by DWP next to Marquez.

Tucker was asked if the DWP had explored the Tier 1 sites. "We don't have any further information on the project right now," she said on May 13.

Visit: ladwp.com/DS104.

Brunelle Wins Parade Theme Contest

By LAURIE ROSENTHAL
Staff Writer

The winning theme for the 2015 Pacific Palisades Fourth of July Parade has been chosen: "Palisades Parade: Pride! Passion! Patriotism!"

Submitted to the Palisades Americanism Parade Association (PAPA) by businesswoman and longtime Palisadian Joyce Brunelle, the idea was chosen from about 25 entries.

Brunelle, who swells with Palisades pride, has been attending the parade since she moved here from Brentwood with her husband, Michael, 17 years ago.

"There is a wonderful sense of community here," she says. And she loves the pride that people show towards the town all year long.

"I feel passionately about this place," says Brunelle, whose parade theme idea was inspired by the volunteers who keep the community going. She cites Marge and Bob Gold, who manage the Village Green, and Flo Eifant, who has educated generations of Palisadians about emergency preparedness, as shining examples of people who have given so much back to the Palisades. She also praises the hard work and dedication of other local pillars, including Chamber of Commerce CEO Arnie Wishnick and native Palisadian Rich Wilken, who both play important roles on the PAPA board.

Brunelle recalls the first Fourth of July parade she viewed as a new resident. "There was an elephant in the parade, followed by a man cleaning up after the elephant, followed by a woman holding up a sign saying we shouldn't have elephants in the parade."



Joyce Brunelle

Photo: Shelby Pascoe

She appreciated that everyone's ideas could be expressed—then and now.

As the theme winner, Brunelle will be riding in the parade with her daughter, Dr. Alice Nesselrodt, son-in-law Clark Nesselrodt and two-year-old grandson Von.

She's already an experienced parade participant, having first walked with her dog, Yogi, in the Patriotic Pups Brigade in 1998. When she rode in the parade the past two years as Chamber president with her son Leo, she was thrilled that people were continually calling out her name. When not in the parade, Brunelle enjoys watching from various locales along the

(Continued on Page 4)

POSTED CUSTOMER

BORROWER'S COPY

U.S. POSTAGE
PAID
Pasadena, CA
Permit #402

Exhibit “C”

**BOARD OF PUBLIC WORKS
MEMBERS**

KEVIN JAMES
PRESIDENT

NEATHER MARIE REPENNING
VICE PRESIDENT

MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

LUZ M. RIVAS
COMMISSIONER

FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1148 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

**COASTAL DEVELOPMENT PERMIT APPLICATION NO. 16-14
FINAL STAFF REPORT**

(Under authority of the *California Coastal Act*, § 30600(b) of the *California Public Resources Code*,
and Chapter 1, Article 2, § 12.20.2 of the *Los Angeles City Municipal Code*)

I. PROJECT DESCRIPTION

Project Title: Inter. @ Sunset Blvd @ Marquez
Ave

Applicants: Department of Water and Power

Project Location:

Council District: 11

Community: Brentwood-Pacific Palisades

District: West Los Angeles

A. Project Description:

The project is located in the public right-of-way parallel with Sunset Boulevard, near the intersection with Marquez Avenue and Marquez Place, within the Brentwood-Pacific Palisades Community Plan (Figure 1. Project Vicinity Map and Figure 2. Aerial Overview).

The Los Angeles Department of Water and Power (LADWP) installed a temporary Pole-Top Distribution Station (PTDS) on Sunset Boulevard near Marquez Avenue in the Pacific Palisades community.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 4'7" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The underground substructure will be

connected to the PTDS via underground cable terminations. The underground substructure consists of approximately 1,000' of trench for conduit installation with a 9'4" X 17'4" substructure near the PTDS. The trench will be from two existing substructures on Marquez and Sunset to the new substructure and the PTDS. The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations. The PTDS would be temporary, and will be removed once a new permanent distribution station is operational. The PTDS is not a permanent solution for the need to provide adequate power service for the Palisades community.

All applicable regulations will be incorporated into and adhered to per standard procedures.

B. Project Background:

"Currently, the power load in Pacific Palisades is being distributed by a single distribution station, Distribution Station 29 (DS-29), constructed almost 80 years ago. The heaviest power load is also being distributed on circuits that are furthest away from DS-29, which negatively impacts reliability for the entire area. There is no space at DS-29 to build more capacity, and LADWP has not yet selected a site for a new D.S. As a temporary measure to relieve three overloaded 4,800 volts circuits that currently serve the Pacific Palisades community, Distribution Construction and Maintenance (DC&M) proposes to install two PTD Stations. To

Final Staff Report
Coastal Development Permit No. 16-14

prevent power outages, limit outage durations, and improve power quality for our Pacific Palisades customers. Without the PTD Stations, the next unscheduled outage that occurs due to natural causes or equipment failures, may last for several hours or days until permanent circuit repairs may be completed" (Ref. 9). Public services and facilities in the areas include the Pacific Palisades Medical Group, Pacific Palisades Veterinary Clinic, and fifteen (15) schools.

C. Project Cost:

The project cost is approximately \$930,000.00.

D. Previous Coastal Commission Actions:

None.

II. REGULATORY BASIS FOR REVIEW

A. Local Coastal Program

PRC § 3600(b) allows local governments to assume authority to issue coastal development permits within its jurisdiction before certification of its local coastal program and the Project is within the City Engineer's jurisdiction (LACMC § 12.20.2 et seq.). The application filed with the City Engineer was deemed adequate.

The Coastal Commission has the responsibility to review proposals for development in the Pacific Palisades coastal zone for compliance with the California Coastal Act of 1976.

The City of Los Angeles does not have a certified Local Coastal Program. However, after certification of the Local Coastal Program, permit processing procedures for coastal permits in the Pacific Palisades coastal zone are controlled by the Coastal Act and the California Code of Regulations. The City's permit issuing ordinances must be certified as part of the Local Implementation Plan. After certification of the Local Coastal Program by the Coastal Commission, the authority of the Coastal Commission is limited to development within the retained or original jurisdiction and to appeals of locally issued coastal development permits.

The Coastal Commission will also retain jurisdiction over amendments to coastal development permits that it approved before certification of the Local Coastal Program. Section 30519(a) of the Coastal Act provides that, except for appeals to the commission (as provided in Section 30603) after a Local Coastal Program, or any portion thereof, has been certified and all implementing actions have become effective, the development review authority provided for in Chapter 7 (commencing with Section 30600) of the Coastal Act shall no longer be exercised by the Coastal Commission and shall at that time be delegated to the local government that is implementing the Local Coastal Program.

Section 30519(b) states that 30519(a) does not apply to development proposed or undertaken on any tidelands, submerged lands, or on public trust lands. The Commission also retains jurisdiction over coastal development permits that were previously approved by the Commission as well as amendments to such permits.

The temporary Pole-Top Distribution Station project is located within the California Coastal Zone which is considered 'single coastal jurisdiction' (i.e., the Coastal Zone of the City of Los Angeles alone). This project must be authorized by a coastal development permit processed pursuant to the requirement of the Coastal Act. The PTDS is considered development, as defined in Section 30106 of the Coastal Act. Section 30106 of the Coastal Act states:

"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, alteration of the size of

Final Staff Report
Coastal Development Permit No. 16-14

any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provision of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).

B. Coastal Guidelines

In accordance with the provisions of Section 30620 of the Public Resources Code; and, in order to sustain the findings contained in Section 12.20.2-G(c) of the Municipal Code which requires a review and consideration of "...Interpretative Guidelines for Coastal Planning and Permits...", the State Coastal Commission has issued Interpretative Guidelines for the South Coast Region of Los Angeles including certain subareas of the City of Los Angeles. These subareas are defined as Pacific Palisades, Venice, Playa Del Rey, San Pedro and Wilmington. However, following prevailing case law (e.g., *Pacific Legal Foundation v. Coastal Commission* (1982) 33 Cal.3d 158), the City Engineer's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations.

C. Issues of Legal Adequacy of the Application

None.

III. STAFF FINDINGS

Six findings are required in order for a Coastal Development Permit to be issued. The six findings are:

(1) That the development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

(2) That the permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

(3) That the Interpretative Guidelines for Coastal Planning and Permits as established by the

California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making its determination.

(4) That the decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

(5) If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, that the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

(6) Any other finding or findings as may be required for the development by the California Environmental Quality Act.

Staff finds as follows:

1. The development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).

In addition to the policies discussed above, Chapter 3 of the California Coastal Act of 1976 provides:

a) **MARINE ENVIRONMENT** (Article 4, of Chapter 3 of Public Resources Code, Sections 30230 through 30237)

Sections 30230 and 30231 state:

Section 30230. Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231. The biological productivity and the quality of coastal waters, streams, wetlands,

**Final Staff Report
Coastal Development Permit No. 16-14**

estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The project is not expected to impact any coastal waters, wetlands, estuaries or lakes. No marine resources exist within or adjacent to the project site.

The project consists of a temporary Pole-Top Distribution Station (PTDS) on Sunset Boulevard in the public right-of-way, in the Pacific Palisades community. The project also requires the installation of an underground vault, conduits, and cables.

Project construction will not involve transport of hazardous substances and, thus, there will be no spillage of crude oil, gas, petroleum products, or hazardous substances as prohibited by PRC Section 30232. The project will not involve the diking, filling, or dredging of open coastal waters (PRC Section 30233), commercial fishing and recreational boating facilities (PRC Sections 30234 and 30234.5), constructing revetments, breakwaters, or other construction altering the natural shoreline (PRC Section 30235). The project does not alter rivers or streams and, therefore, does not affect water supply and flood control (PRC Section 30236). PRC Section 30237 relates to Orange County wetlands and therefore does not apply.

b) LAND RESOURCES (Article 5 of Chapter 3 of Public Resources Code, Sections 30240 through 30244)

Sections 30240 and 30244 state:

Section 30240.

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those 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 those areas, and shall be compatible with the continuance of those habitat and recreation areas. Section 30244. Where development would adversely impact archeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The project site contains no environmentally sensitive habitat areas and does not contain agricultural land or soils or timberland.

The California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB) indicates that ten(10) endangered or threatened species occur or have occurred historically within the Topanga Topographical Quadrangle of the 7.5-minute series map (See Attachment A). The project site does not provide suitable habitat for the species in question. Therefore, no impact to candidate, sensitive, or special status species would occur as a result of construction or operation of the project.

The project involved removal of four eucalyptus trees, of approximately 22-24 feet in height. LADWP will coordinate with the Urban Forestry Division of the Department of Public Works, Bureau of Street Services to ensure replacement of removed trees, and any other requirements as determined by the Bureau.

The project site is within an area of known archaeological resources. The project is in the public right of way, which has already been developed and disturbed.

However, to ensure cultural resources are protected, measures shall be implemented as outlined in the permit conditions in Section V of this report.

c) DEVELOPMENT (Article 6 of Chapter 3 of Public Resources Code, Sections 30250 through 30255)
Coastal Act Sections 30251, 30252, 30253 and 30254 state:

Section 30251. The scenic and visual qualities of coastal areas shall be considered and protected as

Final Staff Report
Coastal Development Permit No. 16-14

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.

The project consists of two 61-foot high, 18.4-inch diameter poles, a platform measuring 26'0" x 7'5", three (3) 833-KVA transformers measuring 6'9" tall x 4'7" wide, cross arms, circuit breakers, switches, and a controller. The project also requires the installation of an underground vault, conduits, and cables. The project is located in the public right-of-way parallel with Sunset Boulevard near the intersection with Marquez Avenue and Marquez Place.

Sunset Boulevard is a City designated scenic highway. Scenic features include views of mountains and estates. According to the Mobility Plan 2035, an element of the General Plan for the City of Los Angeles, "a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground. b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway".

According to the permit application, measures have been implemented to help screen the structures. Their placement is where other utility poles and lights are located. The poles were painted to blend in with the surroundings. There are no unobstructed views of the ocean from the project site.

No adverse impacts to scenic and visual qualities of the coastal area are expected (Figures 3 and 4).

Section 30252. The location and amount of new development should maintain and enhance public

access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project does not interfere with any existing coastal access roadways, bikeways, pedestrian paths or walkways.

Section 30253. 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 land forms along the 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.*
- (4) Minimize energy consumption and vehicle miles traveled.*
- (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

The project would not affect geologic, flood or fire risks (30253(1) (2)), would not conflict with any requirements of the State Air Resources Control Board or South Coast Air Quality District (30253(3)), would not affect energy consumption and vehicle miles traveled (30253(4)), and would not permanently affect the local community (30253(5)).

Final Staff Report
Coastal Development Permit No. 16-14

d) **INDUSTRIAL DEVELOPMENT** (Article 7 of Chapter 3 of Public Resources Code, Sections 30260 through 30265.5)

The project does not involve the development or expansion of industrial developments as addressed in Article 7, and as such, Section 30260 through 30265.5 are not applicable to the project.

2. The permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

The project conforms to relevant provisions and policies of the Coastal Act and the applicable Brentwood-Pacific Palisades Community Plan. The Community Plan recognizes the need for adequate sewers, drainage facilities, fire protection services and other public utilities to support development within hillside areas.

Thus the Project will not prejudice the ability of the City to prepare a Local Coastal Plan in conformity with the Coastal Act and amendments.

3. The Interpretative Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making the City Engineer's determination.

As noted in the preceding Sections, the California Coastal Commission's interpretive guidelines (State and Regional) for the Pacific Palisades area have been reviewed and considered in preparation of these findings and recommendations. However, following prevailing case law (e.g., Pacific Legal Foundation v. Coastal Commission (1982) 33 Cal.3d 158), the City Engineer's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations.

4. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

The decision of the permit granting authority, as evidenced in the staff report of this project, has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

5. If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

a) **PUBLIC ACCESS** (Article 2, of Chapter 3 of the Public Resources Code, Sections 30210 - 30214).

This project is not located between the nearest public road and the sea or shoreline of a body of water located within the coastal zone.

The project will not interfere with coastal access and will not impair any existing access to the coast.

The project is located within the public right-of-way on Sunset Boulevard near the intersection with Marquez Avenue and Marquez Place. There is no coastal access at the project site.

b) **RECREATION** (Article 3, of Chapter 3 of Public Resources Code, Sections 30220 through 30224)

Section 30220. Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

The project will not interfere with or impair any oceanfront or other land suitable for water-oriented recreational activities.

Section 30223. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

The project will not affect any currently undeveloped upland areas that might be approved for coastal recreation uses. There are no existing coastal-dependent recreational uses at the project site.

Final Staff Report
Coastal Development Permit No. 16-14

6. Any other finding or findings as may be required for the development by the California Environmental Quality Act.

Pursuant to the California Environmental Quality Act (CEQA), the LADWP found the project to be exempt from CEQA review and filed a Notice of Exemption on May 26, 2016.

Staff reviewed and considered the Notice of Exemption and determined there are no additional evaluations required by the California Environmental Quality Act in connection with the approval of this permit.

III. PUBLIC COMMENT

A public hearing was held on November 9, 2016 at 1:30 p.m. at the Palisades Branch Library located at 861 Alma Real Drive, Pacific Palisades, CA 90272.

In addition to staff members from the Bureau of Engineering, staff members from the L.A. Department of Water and Power, and a representative from Council District 11, twenty-six (26) members of the public were in attendance. Before the public hearing, twenty-one (21) written comments, including a petition with one hundred eleven (111) signatures, supporting the project were received; four written comments, including a petition with one hundred fifty one (151) signatures, opposing the project were received; two inquiries were received; and five people provided written comments at the hearing. Oral comments were also noted.

The following issues relevant to the California Coastal Act were raised:

1. "The PTDS is already in violation of the Act and must be removed."

Work on the project has stopped. The applicant submitted Application No. 16-14 for a local coastal development permit (CDP), which is evaluated in this staff report.

2. "The City has a conflict of interest and is highly motivated to approve the Application despite it violating the Act."

Section 12.20.2 of the Los Angeles Municipal Code (LAMC) establishes the City Engineer as the permit

granting authority for public projects and private projects where the approval for the underlying permit is within the jurisdiction of the City Engineer. Application No. 16-14 is being processed in accordance with the LAMC.

3. "The PTDS violates the Act due to visual blight and safety."

The project is located within the public right of way. As discussed in the foregoing staff report, measures have been implemented to help screen the structures. The PTDS was placed near other utility poles and lights. The poles were painted in an effort to blend in with the surroundings. There are no unobstructed ocean views from the project site.

The PTDS is designed, constructed and maintained to meet or exceed California Public Utility Commission (CPUC) safety rules and regulations.

4. "Current violations of the Los Angeles General Plan and the Brentwood-Pacific Palisades Community Plan."

As discussed in the foregoing staff report, the Mobility Plan 2035, an element of the General Plan for the City of Los Angeles, states "a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground. b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway". The majority of the project is underground, as stated in the public hearing and will be screened to reduce visibility. The Brentwood-Pacific Palisades Community Plan states: "1. Install utilities underground through assessment districts or other funding, when feasible."

5. "The LADWP has not complied with CEQA and it is a requirement for the PTDS."

As discussed in the foregoing staff report, LADWP filed a Notice of Exemption on May 26, 2016. Class 3 Categorical Exemption consists of construction and location of limited numbers of new, small facilities or structures. The project is also exempt under Section 21080(b)(4), Specific actions

necessary to prevent or mitigate an emergency. The CEQA Notice of Exemption was properly posted by the County Clerk for the public notice and review.

6. "The LADWP has violated due process. ...failing to give sufficient notice and by failing to make materials and accurate information related to the Application available to the public in a timely manner and by holding the hearing on shortened notice after the LADWP had already constructed a significant portion of the PTDS without the proper permit."

Notice was provided in accordance with the LAMC, Section 12.20.2, F. Proceedings and Hearing, which states that "...the appropriate City agency shall notify by mail, at least (10) days prior to the hearing, the following: ..." The Notice of Public Hearing was mailed on October 25, 2016 and the hearing was held on November 9, 2016.

IV. STANDARD CONDITIONS OF APPROVAL

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

V. SPECIAL CONDITIONS OF APPROVAL

1. **Monitor.** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards shall be present to monitor all ground-disturbing activities.
2. **Awareness Training.** Prior to initiation of ground-disturbing activities for the underground portions of the project, the archaeological monitor will conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training would explain the importance of and legal basis for the protection of significant archaeological resources. Each worker would also learn the proper procedures to follow in the event that cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor and the archaeological monitor. It is recommended that this worker education session include visual images of artifacts that might be found in the project vicinity, and that the session take place on-site immediately prior to the start of ground-disturbing activities.
3. **Inadvertent Discovery.** In the event that archaeological resources are exposed during construction, work in the immediate vicinity of the find must stop until a qualified archaeologist can evaluate the significance of the find and make applicable recommendations to avoid significant impacts to

acceptance of the terms and conditions, is returned to the City Engineer's Office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the permit date as reported from the Coastal Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the City Engineer.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the City Engineer an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the City Engineer and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.
6. **Other approvals.** Obtain permit from the State Coastal Commission.

VI. STAFF RECOMMENDATIONS

Based on the preceding analysis, we recommend that the City Engineer issue a Coastal Development Permit for this project.

ME Martin 12/2/16
Maria Martin Date
Manager
Environmental Management Group

DOCUMENT PREPARED BY:

Catalina Hernandez 12/5/16
Catalina Hernandez Date
Environmental Supervisor I

VII. REFERENCES

1. California Coastal Act -- Public Resources Code Division 20, Section 30000 *et seq.*
2. California Coastal Commission, October 14, 1980. *Regional Interpretive Guidelines. South Coast Region. Los Angeles County.*
3. California Coastal Commission, December 16, 1981. *Statewide Interpretive Guidelines.*
4. California Department of Fish and Wildlife Natural Diversity Database (CNDDB) Rare Find, Version 3.1.1, dated May 01, 2016, data will expire November 1, 2016.
5. City of Los Angeles. *Framework Element of the Los Angeles General Plan.*
<http://cityplanning.lacity.org/cwd/frmwk/chapters/00/00.htm>
6. City of Los Angeles. *Municipal Code*, Chapter I, Article 2, Section 12.20.2, *et seq.*
7. City of Los Angeles. *Brentwood-Pacific Palisades Community Plan.*
8. Federal Emergency Management Agency, *Flood Insurance Rate Map*, Community Panel Number 0601370069D, February 4, 1987.
9. Pole-Top Distribution Station Installation, Pacific Palisades Community Background Information for California Environmental Quality Act Exemption, May 20, 2016

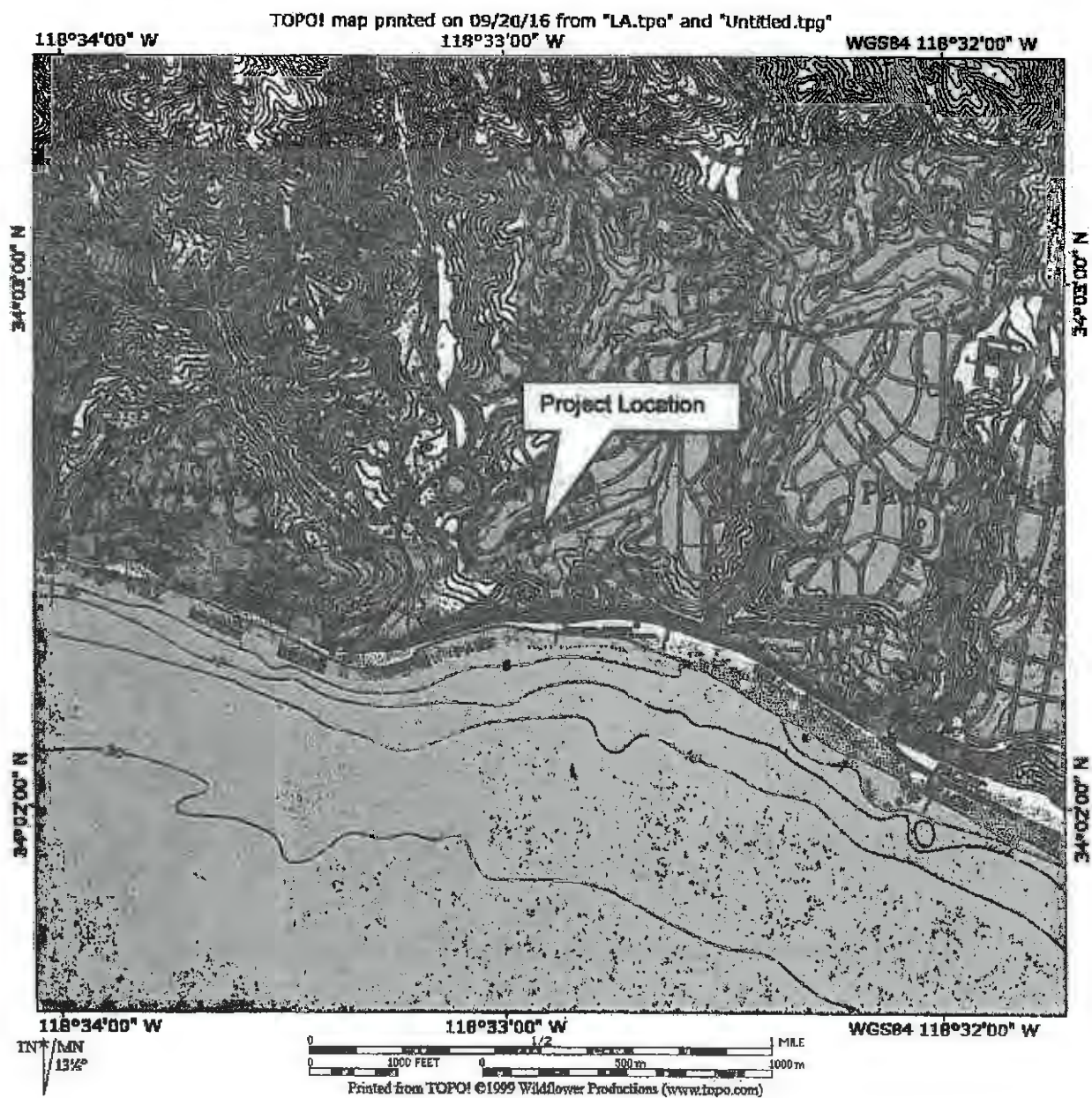


Figure 1. Vicinity map

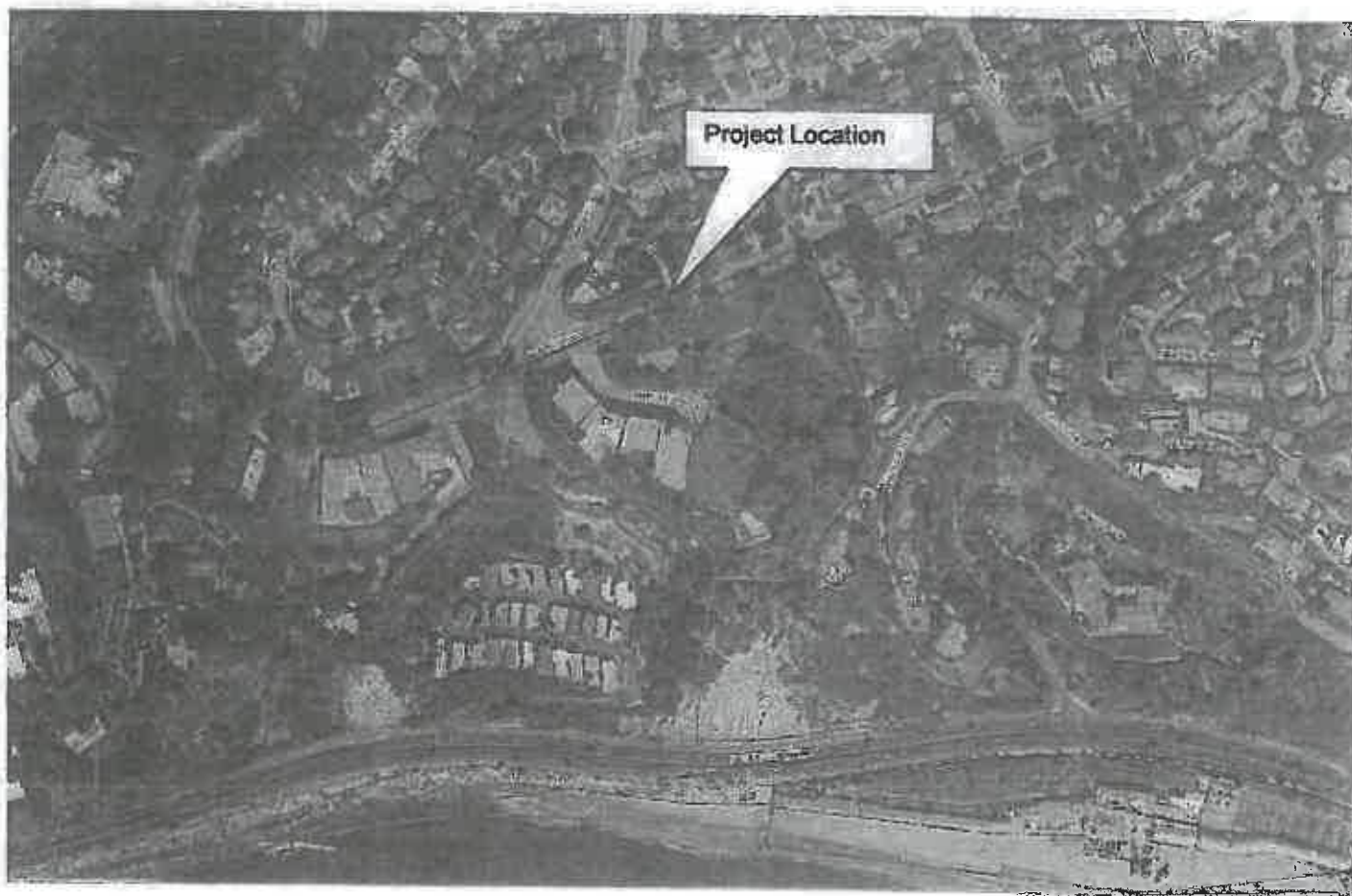


Figure 2. Aerial overview (Google Earth)

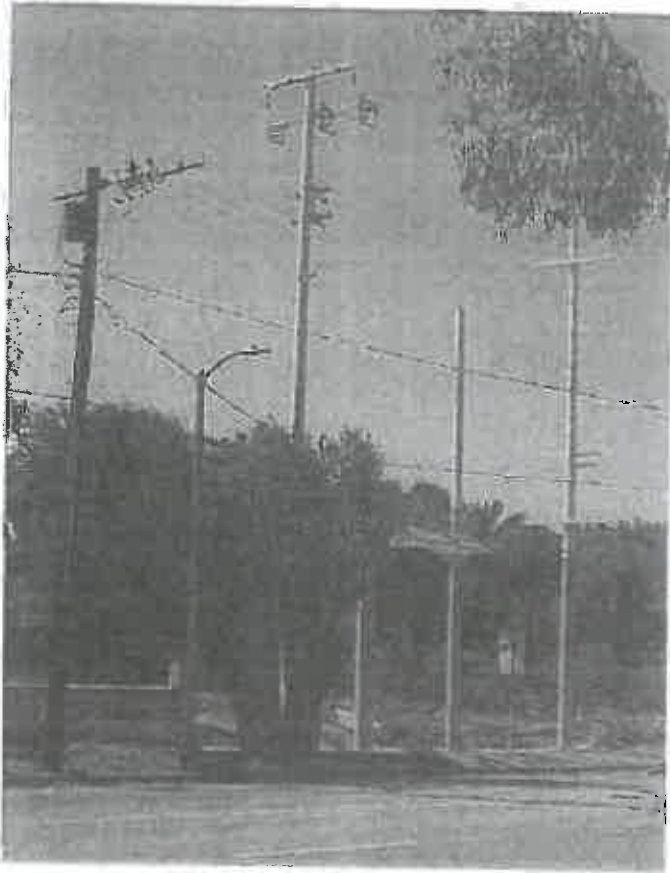


Figure 3. Sunset Blvd. looking west

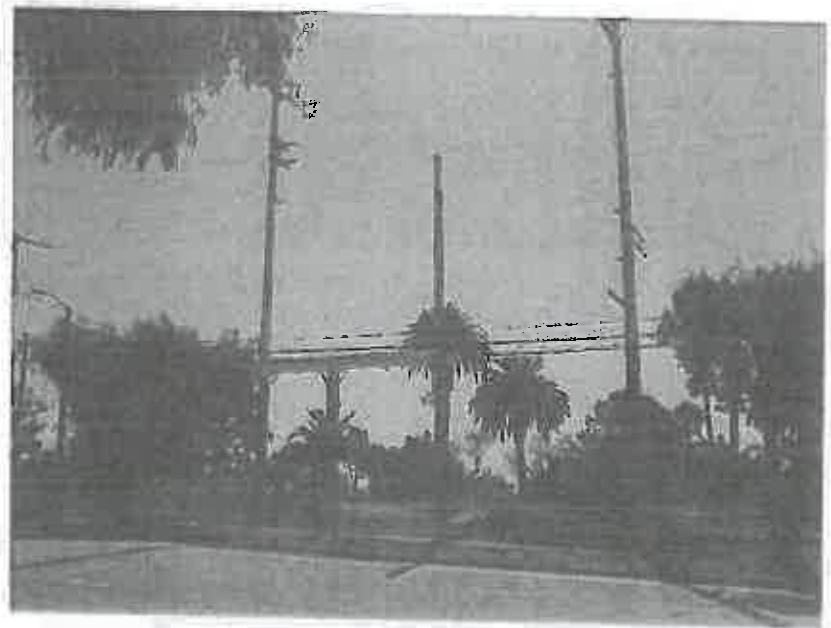


Figure 4. Sunset Blvd. looking south

Attachment A

California Department of Fish and Wildlife

Natural Diversity Database List

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

Status	NDDB Element Ranks	Other Lists
Federal: Endangered	Global: G2	CNPS List: 1B.1
State: None	State: S2	

Habitat Associations

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K. SOIL SPECIALIST; REQUIR

Occurrence No. 2

Map Index: 41759

EO Index: 41759

— Dates Last Seen —

Occ Rank: None

Element: 1941-07-XX

Origin: Natural/Native occurrence

Site: 1941-07-XX

Presence: Possibly Extirpated

Trend: Unknown

Record Last Updated: 2016-04-19

Quad Summary: Canoga Park (3411825/112A), Topanga (3411815/112D)
County Summary: Los Angeles

Lat/Long: 34.09032° / -118.60408°

UTM: Zone-11 N3773332 E352016

Mapping Precision: NON-SPECIFIC

Symbol Type: POLYGON

Area:

Township: 01S

Range: 16W

Section: 07 **Qtr:** XX

Meridian: S

Elevation:

Location: TOPANGA CANYON.

Location Detail: EXACT LOCATION WITHIN CANYON NOT KNOWN. SITE MAPPED TO INCLUDE LENGTH OF ENTIRE CANYON. PRESUMABLY NEAR FERNWOOD ACCORDING TO C. SPENGER.

Ecological:

Threat:

General: MAIN SOURCES OF INFORMATION FOR THIS SITE ARE A 1916 HIATT COLLECTION, A 1917 PEIRSON COLLECTION AND A 1941 BRAUNTON COLLECTION. PRESUMABLY EXTIRPATED ACCORDING TO FOTHERINGHAM. NEEDS FIELDWORK.

Owner/Manager: UNKNOWN

Sources

BAR41S0001	BARNEBY & RIPLEY. BARNEBY SN RSA #105990 (CITED IN CNP02U0001). 1941-07-XX.
FOT98R0001	FOTHERINGHAM, C. & J. KEELEY. ECOLOGY AND DISTRIBUTION OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) AND LYON'S PENTACHAETA (PENTACHAETA LYONII). 1998-04-01.
HIA16S0001	HIATT, O. HIATT SN RSA #1851. 1916-06-03.
PEI17S0001	PEIRSON, F. PEIRSON #592 RSA #90185. 1917-05-01.
SPE86U0008	SPENGER, C. NOTES ON OCCURRENCE #2. 1986-07-20.

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

_____ Status _____	NDDB Element Ranks _____	Other Lists _____
Federal: Endangered	Global: G2	CNPS List: 1B.1
State: None	State: S2	

_____ Habitat Associations _____

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K. SOIL SPECIALIST; REQUIR

Occurrence No. 8

Map Index: 01038

EO Index: 12658

_____ Dates Last Seen _____

Occ Rank: Poor

Element: 1975-XX-XX

Origin: Natural/Native occurrence

Site: 1997-XX-XX

Presence: Presumed Extant

Trend: Unknown

Record Last Updated: 2016-04-26

Quad Summary: Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.05028° / -118.56092°

UTM: Zone-11 N3768830 E355930

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 1/5 mile

Township: 01S

Range: 16W

Section: 28 Qtr: XX

Meridian: S

Elevation: 450 ft

Location: LOS LIONES CANYON, SANTA MONICA MOUNTAINS.

Location Detail: 1942 COLLECTION BY REYNOLDS FROM "SANTA YNEZ CANYON, FIRST CANYON AWAY FROM OCEAN ON SUNSET BLVD" ATTRIBUTED TO THIS SITE. MAPPED ACCORDING TO A 1975 MAP BUT ELEVATION GIVEN AS 1100 FEET WHEREAS ELEVATION IN AREA IS CLOSER TO 450 FEET.

Ecological: 2ND YEAR OF BURNED CHAPARRAL SLOPE ASSOCIATED WITH SUCCESSIONAL SHRUBS: LOTUS SCOPARIUS, DENDROMECON RIGIDA, ERIOGONUM CINEREUM, AND E. FASCICULATUM.

Threat: EROSION, SUCCESSION (1975). BULLDOZED DURING FIRE SUPPRESSION ACTIVITIES (THOMAS 1994). IN 1997, DISTURBED BY EXOTICS.

General: FEWER THAN 10 PLANTS IN 1975 IN 2ND YEAR OF BURNED CHAPARRAL. SINCE AREA HAS RECOVERED FROM BURN, SP CROWDED OUT BY NON-NATIVES. NO PLANTS SEEN IN 1996 SEARCH BY KEELEY. NO REPRODUCING PLANTS FOUND BY FOTHERINGHAM IN 1997.

Owner/Manager: DPR-TOPANGA SP?

_____ Sources _____

- | | |
|------------|--|
| CNP02U0001 | CALIFORNIA NATIVE PLANT SOCIETY. DRAFT PETITION TO LIST ASTRAGALUS BRAUNTONII AS ENDANGERED. 2002-XX-XX. |
| FOT98R0001 | FOTHERINGHAM, C. & J. KEELEY. ECOLOGY AND DISTRIBUTION OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) AND LYON'S PENTACHAETA (PENTACHAETA LYONII). 1998-04-01. |
| KEE96R0002 | KEELEY, J. VEGETATION MANAGEMENT, FIRE ECOLOGY AND COMPETITION AS IT AFFECTS ESSENTIAL HABITAT FOR PENTACHAETA LYONII & ASTRAGALUS BRAUNTONII. 1996-11-26. |
| KEN75F0001 | KENNEY, J.P. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 1975-05-XX. |
| KEN83U0001 | KENNEY, J.P. LETTER TO SAC REGARDING OCC. #008, IN LOS LIONES CANYON. 1983-05-01. |
| LAN03U0003 | LANDIS, B. DRAFT PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION TO LIST ASTRAGALUS BRAUNTONII AS ENDANGERED. 2003-12-XX. |
| REY42S0001 | REYNOLDS, S. REYNOLDS SN RSA #229251 (ALSO CITED IN CNP02U0001). 1942-XX-XX. |
| THO94U0001 | THOMAS, T. RECORD OF PHONE CONVERSATION WITH TIM THOMAS BY RONNIE GLICK (FORWARDED TO R. BITTMAN). 1994-07-07. |

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

_____ Status _____	NDDB Element Ranks	_____ Other Lists _____
Federal: Endangered	Global: G2	CNPS List: 1B.1
State: None	State: S2	

_____ Habitat Associations _____

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K. SOIL SPECIALIST; REQUIR

Occurrence No. 14

Map Index: 01045

EO Index: 13904

_____ Dates Last Seen _____

Occ Rank: Good

Element: 2007-04-22

Origin: Natural/Native occurrence

Site: 2007-04-22

Presence: Presumed Extant

Trend: Unknown

Record Last Updated: 2009-08-13

Quad Summary: Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.08384° / -118.55878°

UTM: Zone-11 N3772548 E356184

Mapping Precision: SPECIFIC

Symbol Type: POLYGON

Area: 28.0 acres

Township: 01S

Range: 16W

Section: 16 Qtr: E

Meridian: S

Elevation: 1,200 ft

Location: ALONG TRAILER CANYON ROAD, BETWEEN MICHAEL LANE AND TOPANGA STATE PARK, PALISADES HIGHLANDS.

Location Detail: ON BOTH SIDES OF THE ROAD. MAPPED BY CNDDB AS 3 POLYGONS.

Ecological: IN, ABOUT AND BELOW LIMESTONE QUARRY ASSOCIATED WITH ORYZOPSIS MILICEA AND NICOTIANA GLAUCA ON DISTURBED SITES. PLANTS ALSO OCCUR ALONG FIRE ROADS AND ARE ASSOCIATED WITH YUCCA, SALVIA, MALOSMA, CEANOETHUS MEGACARPUS, AND C. SPINOSUS.

Threat: DEVELOPMENT COULD THREATEN. FIRE ROAD RECENTLY SCRAPPED IN 2003. RECREATION IN AREA.

General: ABOUT 200 PLANTS OBSERVED IN 1987, 11 IN 1988, NONE IN 1996, NONE IN 1997, 28 IN 2001, 19 IN 2003 AND 11 IN 2004. MAIN POPULATION IS MOST LIKELY IN A SEED BANK AT THE TOP OF THE RIDGE, ACCORDING TO LANDIS. 95 TOTAL SEEN IN '04, 89 IN '07.

Owner/Manager: PVT

_____ Sources _____

- | | |
|------------|--|
| DIC88F0001 | DICE, J. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 1988-04-06. |
| DIC88S0001 | DICE, J. DICE #846 SQ #122700. 1988-04-06. |
| FOT98R0001 | FOTHERINGHAM, C. & J. KEELEY. ECOLOGY AND DISTRIBUTION OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) AND LYON'S PENTACHAETA (PENTACHAETA LYONII). 1988-04-01. |
| HOL04F0034 | HOLSTEIN, G. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 2004-04-17. |
| HOL04S0001 | HOLSTEIN, G. HOLSTEIN SN DAV #50216. 2004-04-17. |
| HOL87F0018 | HOLLOMBE, D. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 1987-02-16. |
| HOL87U0001 | HOLLOMBE, D. LETTER TO R. BITTMAN. 1987-02-21. |
| KEE96R0002 | KEELEY, J. VEGETATION MANAGEMENT, FIRE ECOLOGY AND COMPETITION AS IT AFFECTS ESSENTIAL HABITAT FOR PENTACHAETA LYONII & ASTRAGALUS BRAUNTONII. 1996-11-26. |
| LAN03U0001 | LANDIS, B. & I. ANDERSON. REPORT ON FIELD SURVEY FOR ASTRAGALUS BRAUNTONII IN THE AREA OF TEMESCAL TRAIL AND TRAILER CANYON. INCLUDES GPS COORDINATES. 2003-11-06. |
| LAN03U0003 | LANDIS, B. DRAFT PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION TO LIST ASTRAGALUS BRAUNTONII AS ENDANGERED. 2003-12-XX. |
| LAN07R0001 | LANDIS, B. SURVEYS AND OBSERVATIONS OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) 2006 AND |

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

_____ Status _____	_____ NDDB Element Ranks _____	_____ Other Lists _____
Federal: Endangered	Global: G2	CNPS List: 1B.1
State: None	State: S2	

_____ Habitat Associations _____

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K.
SOIL SPECIALIST; REQUIR

2007. 2007-08-31.

- | | |
|------------|---|
| PRI02U0001 | PRIGGE, B. EMAIL TO D. TIBOR REGARDING ASTRAGALUS BRAUNTONII AT TRAILER CANYON. 2002-11-20. |
| PRI88F0002 | PRIGGE, B. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 1988-09-27. |
| PRI88F0003 | PRIGGE, B. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 1988-09-27. |

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: Endangered Global: G2
State: None State: S2 CNPS List: 1B.1

____ Habitat Associations _____
General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.
Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K.
SOIL SPECIALIST; REQUIR

Occurrence No. 15 Map Index: 01075 EO Index: 19381 _____ Dates Last Seen _____
Occ Rank: Good Element: 2010-08-05
Origin: Natural/Native occurrence Site: 2010-08-05
Presence: Presumed Extant
Trend: Unknown

Record Last Updated: 2016-04-21

Quad Summary: Topanga (3411815/112D)
County Summary: Los Angeles

Lat/Long: 34.07775° / -118.54451° Township: 01S
UTM: Zone-11 N3771853 E357491 Range: 16W
Mapping Precision: SPECIFIC Section: 15 Qtr: SW
Symbol Type: POLYGON Meridian: S
Area: 16.0 acres Elevation: 1,700 ft

Location: ALONG TEMESCAL RIDGE ROAD, JUST UPHILL FROM AVENIDA ASHLEY, PACIFIC PALISADES.
Location Detail: SITE IS CLEARED ANNUALLY. MECHANICAL DISTURBANCE MAY BE LEADING TO LARGE NUMBER OF PLANTS GERMINATING EACH YEAR. BY 2003, PLANTS LIMITED TO A BAND OF MALOSMA LAURINA AT ONE EDGE OF THE FIREBREAK.

Ecological: ON MARGIN OF FIRE ROAD ON RIDGE TOP WITH CORETHROGYNE, MALOSMA LAURINA, HESPEROYUCCA WHIPPLEI, HAZARDIA SQUARROSA, RHUS OVATA X RHUS INTEGRIFOLIA, RHAMNUS CROCEA, AND GRASSES.

Threat: AREA CLEARED FOR POWERLINES AND FUEL BREAK. NON-NATIVE PLANTS THREATEN. HOUSES BUILT NEARBY. RECREATION IN AREA.

General: 1 PLANT OBSERVED IN 1987. 2000 PLANTS BETWEEN OCCURRENCE #15 & #17 IN 1996 AND 1997. 333 TO 1333 PLANTS IN 1998, 827 IN 2003, 959 IN 2004, 271 IN 2006. 2121 PLANTS THROUGHOUT OCCURRENCE IN 2007. 134 PLANTS IN N POLYGON IN 2010.

Owner/Manager: PVT

____ Sources _____

- | | |
|------------|--|
| EDW10F0003 | EDWARDS, A. (BONTERRA CONSULTING). FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII & JUGLANS CALIFORNICA. 2010-08-05. |
| EDW10S0004 | EDWARDS, A. & S. NORTON. EDWARDS #2010-4 RSA #759630. 2010-08-05. |
| FOT98R0001 | FOTHERINGHAM, C. & J. KEELEY. ECOLOGY AND DISTRIBUTION OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) AND LYON'S PENTACHAETA (PENTACHAETA LYONII). 1998-04-01. |
| FRA06R0002 | FRAGA, N. & M. WALL. REPORT OF SEED COLLECTION ACTIVITIES OF FEDERALLY LISTED SPECIES ON NATIONAL PARK SERVICE LANDS. 2006-11-29. |
| HOL97F0019 | HOLLOMBE, D. FIELD SURVEY FORM FOR ASTRAGALUS BRAUNTONII. 1987-02-XX. |
| KEE98R0002 | KEELEY, J. VEGETATION MANAGEMENT, FIRE ECOLOGY AND COMPETITION AS IT AFFECTS ESSENTIAL HABITAT FOR PENTACHAETA LYONII & ASTRAGALUS BRAUNTONII. 1998-11-26. |
| LAN03U0001 | LANDIS, B. & I. ANDERSON. REPORT ON FIELD SURVEY FOR ASTRAGALUS BRAUNTONII IN THE AREA OF TEMESCAL TRAIL AND TRAILER CANYON. INCLUDES GPS COORDINATES. 2003-11-06. |
| LAN03U0003 | LANDIS, B. DRAFT PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION TO LIST ASTRAGALUS BRAUNTONII AS ENDANGERED. 2003-12-XX. |

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

_____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: Endangered Global: G2
State: None State: S2 CNPS List: 1B.1

_____ Habitat Associations _____

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K.
SOIL SPECIALIST; REQUIR

_____ Sources _____

LAN03U0004 LANDIS, B. EMAIL TO D. TIBOR REGARDING ASTRAGALUS BRAUNTONII AT TEMESCAL RIDGE. 2003-03-07.
LAN03U0005 LANDIS, B. COMMENTS ON ASTRAGALUS BRAUNTONII LISTING PACKAGE. 2003-07-23.
LAN07R0001 LANDIS, B. SURVEYS AND OBSERVATIONS OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) 2006 AND
2007. 2007-08-31.

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

_____ Status _____	_____ NDDB Element Ranks _____	_____ Other Lists _____
Federal: Endangered	Global: G2	CNPS List: 1B.1
State: None	State: S2	

_____ Habitat Associations _____

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K. SOIL SPECIALIST; REQUIR

Occurrence No. 17

Map Index: 01127

EO Index: 12657

_____ Dates Last Seen _____

Occ Rank: Unknown

Element: 2006-07-18

Origin: Natural/Native occurrence

Site: 2006-07-18

Presence: Presumed Extant

Trend: Unknown

Record Last Updated: 2016-04-20

Quad Summary: Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.06845° / -118.53703°

UTM: Zone-11 N3770812 E358165

Mapping Precision: SPECIFIC

Symbol Type: POLYGON

Area: 5.0 acres

Township: 01S

Range: 16W

Section: 22 Qtr: NE

Meridian: S

Elevation: 1,000 ft

Location: TEMESCAL RIDGE FIRE ROAD, NE OF THE NDRTH END OF BIENVENEDA AVE.

Location Detail: ALONG THE TRAIL AND IN AN OPEN FUEL BREAK. 2 COLONIES. EASTERN COLONY IS AT THE POINT WHERE ROAD TURNS UPWARD OUT OF THE CANYON BOTTOM. WESTERN COLONY IS APPROXIMATELY 0.3 AIR MILE WEST OF THIS POINT ON THE RIDGETOP.

Ecological: PRIMARILY IN OPEN AREAS OF DISTURBED CHAPARRAL. ADJACENT SLDPS DOMINATED BY MALDSMA LAURINA, ERIOGONUM FASCICULATUM, LESSINGIA FILAGINIFOLIA, BROMUS RUBENS, B. DIANDRUS, AND BRASSICA GENICULATA.

Threat:

General: FOLLOWING 1978 FIRE, PLANTS WERE SEEN IN 1979-81 IN EASTERN COLONY. NO PLANTS SEEN IN 1986. 2000 PLANTS SEEN BETWEEN OCCURRENCES #15 AND 17 IN 1996. 45 PLANTS OBSERVED IN 2006 IN WESTERN COLONY.

Owner/Manager: DPR-TOPANGA SP

_____ Sources _____

- | | |
|------------|---|
| FOT98R0001 | FDOTHERINGHAM, C. & J. KEELEY. ECOLDGY AND DISTRIBUTION OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) AND LYDN'S PENTACHAETA (PENTACHAETA LYDNII). 1998-04-01. |
| FRA06R0002 | FRAGA, N. & M. WALL. REPORT OF SEED COLLECTION ACTIVITIES OF FEDERALLY LISTED SPECIES ON NATIONAL PARK SERVICE LANDS. 2006-11-29. |
| FRA06S0001 | FRAGA, N. ET AL. FRAGA #1679 RSA #720495 UC #1922187 UCR #186848. 2008-05-10. |
| KEE96R0002 | KEELEY, J. VEGETATION MANAGEMENT, FIRE ECOLOGY AND COMPETITION AS IT AFFECTS ESSENTIAL HABITAT FOR PENTACHAETA LYONII & ASTRAGALUS BRAUNTONII. 1996-11-26. |
| KEN86U0001 | KENNY, J. LETTER TO C. SPENGER. 1986-08-08. |

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

----- Status -----

NDDDB Element Ranks

----- Other Lists -----

Federal: Endangered

Global: G2

CNPS List: 1B.1

State: None

State: S2

----- Habitat Associations -----

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K. SOIL SPECIALIST; REQUIR

Occurrence No. 18

Map Index: 01163

EO Index: 19380

----- Dates Last Seen -----

Occ Rank: None

Element: 1971-05-16

Origin: Natural/Native occurrence

Site: 1998-XX-XX

Presence: Possibly Extirpated

Trand: Unknown

Record Last Updated: 2016-04-20

Quad Summary: Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.05762° / -118.52783°

UTM: Zone-11 N3769598 E358996

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 2/5 mile

Township: 01S

Range: 16W

Section: 26 Qtr: XX

Meridian: S

Elevation: 800 ft

Location: TEMESCAL CANYON NEAR SUNSET BOULEVARD.

Location Detail: BARNEBY SUPPOSES THIS SITE MUST BE THE POPULATION ON FIREBREAK THAT GOES INTO HILLS NORTH OF SUNSET BLVD SHORTLY BEFORE OLD WILL ROGERS RANCH. LOCATION IS BEST GUESS; NEEDS FIELDWORK. ELEVATION ON COLLECTION LABELS RANGES FROM 250-1000 FT.

Ecological:

Threat:

General: BASED ON COLLECTIONS FROM 1942, 1960 & 1971. BARNEBY SAID THAT 45 YEARS AGO PLANT WAS FLOURISHING BUT VERY LOCALIZED POPULATIONS IN THIS AREA. AREA SEARCHED BY J. KEELEY IN 1996, NO PLANTS SEEN. NONE SEEN BY FOTHERINGHAM IN 1998.

Owner/Manager: UNKNOWN

----- Sources -----

- | | |
|------------|--|
| BAR86U0002 | BARNEBY, R. LETTER TO C. SPENGER: ASTRAGALUS BRAUNTONII. 1986-06-08. |
| CNP02U0001 | CALIFORNIA NATIVE PLANT SOCIETY. DRAFT PETITION TO LIST ASTRAGALUS BRAUNTONII AS ENDANGERED. 2002-XX-XX. |
| FOT98R0001 | FOTHERINGHAM, C. & J. KEELEY. ECOLOGY AND DISTRIBUTION OF BRAUNTON'S MILK-VETCH (ASTRAGALUS BRAUNTONII) AND LYON'S PENTACHAETA (PENTACHAETA LYONII). 1998-04-01. |
| GRA71S0002 | GRAYUM, M. GRAYUM SN SFV #4899. 1971-05-16. |
| HAS42S0001 | HASTINGS, G. HASTINGS SN NY #621864 (ALSO CITED IN CNP02U0001). 1942-04-26. |
| KEE96R0002 | KEELEY, J. VEGETATION MANAGEMENT, FIRE ECOLOGY AND COMPETITION AS IT AFFECTS ESSENTIAL HABITAT FOR PENTACHAETA LYONII & ASTRAGALUS BRAUNTONII. 1996-11-26. |
| LAN03U0003 | LANDIS, B. DRAFT PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION TO LIST ASTRAGALUS BRAUNTONII AS ENDANGERED. 2003-12-XX. |
| RAV60S0044 | RAVEN, P. & H. THOMPSON. RAVEN #15382 LA #35990. 1960-05-16. |

Astragalus brauntonii

Braunton's milk-vetch

Element Code: PDFAB0F1G0

_____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: Endangered Global: G2
State: None State: S2 CNPS List: 1B.1

_____ Habitat Associations _____

General: CHAPARRAL, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.

Micro: RECENT BURNS OR DISTURBED AREAS; IN SALINE, SOMEWHAT ALKALINE SOILS HIGH IN CA, MG, WITH SOME K.
SOIL SPECIALIST; REQUIR

Occurrence No. 34

Map Index: 99706

EO Index: 69243

_____ Dates Last Seen _____

Occ Rank: Unknown

Element: 1921-05-XX

Origin: Natural/Native occurrence

Site: 1921-05-XX

Presence: Presumed Extant

Trend: Unknown

Record Last Updated: 2016-04-19

Quad Summary: Beverly Hills (3411814/111C), Topanga (3411815/112D)
County Summary: Los Angeles

Lat/Long: 34.06653° / -118.50011°

UTM: Zone-11 N3770547 E361571

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Area:

Township: 01S

Range: 15W

Section: 19 Qtr: XX

Meridian: S

Elevation:

Location: CANYON NEAR BRENTWOOD, SANTA MONICA MOUNTAINS.

Location Detail: EXACT LOCATION UNKNOWN. MAPPED BY CNDDB AS A BEST GUESS AROUND THE CANYONS JUST NW OF
HISTORIC BRENTWOOD.

Ecological:

Threat: DEVELOPMENT.

General: ONLY SOURCE OF INFORMATION FOR THIS SITE IS A 1921 MARVIN COLLECTION. SOME SUITABLE HABITAT
REMAINS IN AREA.

Owner/Manager: UNKNOWN

_____ Sources _____

MAR21S0002 MARVIN, J. MARVIN SN RSA #416785. 1921-05-XX.

Astragalus pycnostachyus* var. *lanosissimus

Ventura Marsh milk-vetch

Element Code: PDFAB0F7B1

Status: _____ NDDB Element Ranks: _____ Other Lists: _____
Federal: Endangered Global: G2T1
State: Endangered State: S1 CNPS List: 1B.1

Habitat Associations

General: MARSHES AND SWAMPS, COASTAL DUNES, COASTAL SCRUB.

Micro: WITHIN REACH OF HIGH TIDE OR PROTECTED BY BARRIER BEACHES, MORE RARELY NEAR SEEPS ON SANDY BLUFFS. 1-35 M.

Occurrence No. 3

Map Index: 01228

EO Index: 19296

Dates Last Seen

Occ Rank: None

Origin: Natural/Native occurrence

Element: 1882-10-XX

Presence: Extirpated

Site: 196X-XX-XX

Trend: Unknown

Record Last Updated: 1989-08-11

Quad Summary: Topanga (3411815/112D), Beverly Hills (3411814/111C)
County Summary: Los Angeles

Lat/Long: 34.02251° / -118.50842°

UTM: Zone-11 N3765677 E360731

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 1 mile

Township: 02S

Range: 16W

Section: 01 Qtr: XX

Meridian: S

Elevation: 5 ft

Location: MEADOW NEAR SEASHORE, SANTA MONICA

Location Detail:

Ecological: MEADOW.

Threat:

General: THREE COLLECTIONS BY PARISH AND PARISH ATTRIBUTED TO THIS SITE AND ONE BY GREATA BARNEBY (1964) SEARCHED MARSHES IN THIS AREA AND CONSIDERED THIS POPULATION TO BE EXTIRPATED.

Owner/Manager: UNKNOWN

Sources

- | | |
|------------|---|
| BAR64A0005 | BARNEBY, R. ATLAS OF NORTH AMERICAN ASTRAGALUS: PART II, MEMOIRS OF THE NEW YORK BOTANICAL GARDEN VOL. 13: 810-813. 1964-XX-XX. |
| GRE00S0001 | GREATA, L. GREATA #1931 RSA #415838. 1900-09-02. |
| MAG98R0001 | MAGNEY, D. PETITION TO THE FISH AND GAME COMMISSION TO LIST THE VENTURA MARSH MILKVETCH AS AN ENDANGERED SPECIES. 1998-09-23. |
| PAR82S0013 | PARISH, S. & W. PARISH. PARISH SN WS (CITED IN BAR64A0005). 1882-10-XX. |
| PAR82S0014 | PARISH, S. & W. PARISH. PARISH SN ND, UC, WS (CITED IN BAR64A0005). 1882-10-XX. |
| PARNDS0012 | PARISH, S. & W. PARISH. PARISH #1117 UC (CITED IN BAR64A0005). XXXX-XX-XX. |

California Department of Fish and Game
 Natural Diversity Database
 Full Report with Sources for Selected Elements
 Topanga Quad

Astragalus tener* var. *titi

coastal dunes milk-vetch

Element Code: PDFAB0F8R2

Status	NDDB Element Ranks	Other Lists
Federal: Endangered	Global: G2T1	CNPS List: 1B.1
State: Endangered	State: S1	

Habitat Associations

General: COASTAL BLUFF SCRUB, COASTAL DUNES, COASTAL PRAIRIE.

Micro: MOIST, SANDY DEPRESSIONS OF BLUFFS OR DUNES ALONG AND NEAR THE PACIFIC OCEAN; ONE SITE ON A CLAY TERRACE. 1-45 M.

Occurrence No. 3

Map Index: 35233

EO Index: 42743

Dates Last Seen

Occ Rank: None

Origin: Natural/Native occurrence

Element: XXXX-XX-XX

Presence: Possibly Extirpated

Site: XXXX-XX-XX

Trend: Unknown

Record Last Updated: 2000-04-12

Quad Summary: Beverly Hills (3411814/111C), Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.01962° / -118.48594°

UTM: Zone-11 N3765326 E362802

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 1 mile

Township: 02S

Range: 15W

Section: XX **Qtr:** XX

Meridian: S

Elevation: 100 ft

Location: SANTA MONICA.

Location Detail: EXACT LOCATION NOT KNOWN. MAPPED IN THE VICINITY OF SANTA MONICA.

Ecological:

Threat:

General: MAIN SOURCE OF INFORMATION FOR THIS SITE IS UNDATED COLLECTION BY HASSE. R. BARNEBY (1964) BELIEVES THIS SITE IS PROBABLY EXTIRPATED.

Owner/Manager: UNKNOWN

Sources

- | | |
|------------|---|
| BAR50A0001 | BARNEBY, R. PUGILLUS ASTRAGALORUM XII: SOME PROBLEMS IN CALIFORNIA. EL ALISO 2(3):203-215. 1950-XX-XX. |
| BAR64A0001 | BARNEBY, R. ATLAS OF NORTH AMERICAN ASTRAGALUS. MEMOIRS OF THE N.Y. BOTANICAL GARDEN, 13:952-1048. 1964-XX-XX. |
| HASNDS0003 | HASSE. HASSE SN NY (CITED IN BAR50A0001). XXXX-XX-XX. |
| LIS89R0001 | LISTON, A. "THE CONSERVATION BIOLOGY OF ASTRAGALUS SECTION LEPTOCARPI SUBSECTION CALIFORNICI. RSA BOTANIC GARDEN. 1989-05-02. |

Buteo swainsoni

Swainson's hawk

Element Code: ABNKC19070

Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: None Global: G5
State: Threatened State: S3 CDFG Status: _____

Habitat Associations

General: BREEDS IN GRASSLANDS WITH SCATTERED TREES, JUNIPER-SAGE FLATS, RIPARIAN AREAS, SAVANNAHS, & AGRICULTURAL OR RANCH LANDS

Micro: REQUIRES ADJACENT SUITABLE FORAGING AREAS SUCH AS GRASSLANDS, OR ALFALFA OR GRAIN FIELDS SUPPORTING RODENT POPULATIONS.

Occurrence No. 2538

Map Index: 35233

EO Index: 91448

_____ Dates Last Seen _____

Occ Rank: None

Element: 1896-05-11

Origin: Natural/Native occurrence

Site: 1896-05-11

Presence: Possibly Extirpated

Trend: Unknown

Record Last Updated: 2013-10-22

Quad Summary: Beverly Hills (3411814/111C), Topanga (3411815/112D)
County Summary: Los Angeles

Let/Long: 34.01962° / -118.48594°

UTM: Zone-11 N3765326 E362802

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 1 mile

Township: 02S

Range: 15W

Section: XX Qtr: XX

Meridian: S

Elevation: 100 ft

Location: SANTA MONICA

Location Detail: MAPPED GENERALLY TO SPECIMEN LOCALITY "SANTA MONICA," EXACT COLLECTION LOCATIONS UNKNOWN.

Ecological: 1892: NEST IN SYCAMORE. 1896: 2 NESTS FOUND IN SYCAMORES: 1ST 50' UP, MADE OF STICKS & LINED WITH GREEN LEAVES; 2ND 90' UP, MADE OF STICKS & LINED WITH SYCAMORE LEAVES, "A VERY SMALL ONE, YOU COULD ALMOST SEE THROUGH IT."

Threat: DEVELOPMENT SINCE THE DATE OF COLLECTION MAY HAVE ELIMINATED NESTING OR FORAGING HABITAT.

General: ADULT OBSERVED AND TWO EGGS COLLECTED ON 15 MAR 1892. EGGS COLLECTED ON 29 APR 1895 AND 20 APR 1896. SET OF TWO EGGS TAKEN ON 11 MAY 1896. THE BREEDING POPULATION OF THE TRANSVERSE RANGES REGION IS GENERALLY CONSIDERED TO BE EXTIRPATED.

Owner/Manager: UNKNOWN

Sources

BLO79R0001 BLOOM, P. THE STATUS OF THE SWAINSON'S HAWK IN CALIFORNIA, 1979. 1979-XX-XX.
CHA96S0004 CHAMBERS, W. WFVZ EGG-NEST SPECIMENS #80508, 97371, & 171501, COLLECTED FROM SANTA MONICA 1895-1896. 1896-05-11.
HOW92S0002 HOWARD, E. WFVZ EGG-NEST SPECIMEN #97288, COLLECTED IN SANTA MONICA. 1892-03-15.

Chloropyron maritimum ssp. maritimum

salt marsh bird's-beak

Element Code: PDSCR0J0C2

_____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: Endangered **Global:** G4?T1
State: Endangered **State:** S1 **CNPS List:** 1B.2

_____ Habitat Associations _____
General: COASTAL SALT MARSH, COASTAL DUNES.
Micro: LIMITED TO THE HIGHER ZONES OF THE SALT MARSH HABITAT. 0-30 M.

Occurrence No. 14 **Map Index:** 35233 **EO Index:** 34955 **_____ Dates Last Seen _____**
Occ Rank: None **Element:** XXXX-XX-XX
Origin: Natural/Native occurrence **Site:** 1981-XX-XX
Presence: Extirpated
Trend: Unknown

Record Last Updated: 1998-10-16

Quad Summary: Beverly Hills (3411814/111C), Topanga (3411815/112D)
County Summary: Los Angeles

Lat/Long: 34.01962° / -118.48594° **Township:** 02S
UTM: Zone-11 N3785328 E362802 **Range:** 15W
Mapping Precision: NON-SPECIFIC **Section:** XX **Qtr:** XX
Symbol Type: POINT **Meridian:** S
Radius: 1 mile **Elevation:** 100 ft

Location: NEAR SANTA MONICA.
Location Detail: EXACT LOCATION NOT KNOWN. MAPPED IN GENERAL VICINITY OF SANTA MONICA.

Ecological:

Threat:

General: UNKNOWN WHEN COLLECTED BY HASSE. AREA SEARCHED IN 1980, 1981; NO PLANTS OBSERVED.
SPECIES IS PROBABLY EXTIRPATED AT THIS SITE (FOX AND KNUDSEN, 1982; P. ALLEN, 1974).

Owner/Manager: UNKNOWN

_____ **Sources** _____
FOX82R0001 FOX, L. & M. KNUDSEN. RECOVERY PLAN. 1982-XX-XX.
HASNDS0001 HASSE. HASSE SN DSS. XXXX-XX-XX.

Dithyrea maritima

beach spectaclepod

Element Code: PDBRA10020

Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: None Global: G1
State: Threatened State: S1 CNPS List: 1B.1

Habitat Associations _____

General: COASTAL DUNES, COASTAL SCRUB.

Micro: SEA SHORES, ON SAND DUNES, AND SANDY PLACES NEAR THE SHORE. 3-65 M.

Occurrence No. 11

Map Index: 40194

EO Index: 35196

_____ Dates Last Seen _____

Occ Rank: Unknown

Origin: Natural/Native occurrence

Element: 1884-07-XX

Presence: Presumed Extant

Site: 1884-07-XX

Trend: Unknown

Record Last Updated: 2015-05-15

Quad Summary: Topanga (3411815/112D), Venice (3311884/090B), Beverly Hills (3411814/111C)
County Summary: Los Angeles

Lat/Long: 34.01281° / -118.49073°

UTM: Zone-11 N3764578 E362349

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 1 mile

Township: 02S

Range: 15W

Section: 07

Qtr: XX

Meridian: S

Elevation: 20 ft

Location: DUNES OF COAST NEAR SANTA MONICA.

Location Detail: EXACT LOCATION UNKNOWN. MAPPED BY CNDDDB NEAR THE BEACHES WEST OF SANTA MONICA.

Ecological: COASTAL DUNES.

Threat:

General: ONLY SOURCE OF INFORMATION FOR THIS SITE IS AN 1884 LYON COLLECTION. NEEDS FIELDWORK.

Owner/Manager: UNKNOWN

Sources _____

LYO84S0003 LYON, W. LYON SN GH #379173. 1884-07-XX.

MAJ79U0001 MAJOR, M. CNPS NOTE CARD - DUNES NEAR SANTA MONICA, 1884. 1979-01-XX.

Dudleya cymosa ssp. ovatifolia

Santa Monica dudleya

Element Code: PDCRA040A5

_____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: Threatened Global: G5T1
State: None State: S1 CNPS List: 1B.1

_____ Habitat Associations _____
General: CHAPARRAL, COASTAL SCRUB.
Micro: IN CANYONS ON SEDIMENTARY CONGLOMERATES; PRIMARILY N-FACING SLOPES. 210-500 M.

Occurrence No. 2 Map Index: 17769 EO Index: 10157 _____ Dates Last Seen _____
Occ Rank: Unknown Element: 2010-XX-XX
Origin: Natural/Native occurrence Site: 2010-XX-XX
Presence: Presumed Extant
Trend: Unknown
Record Last Updated: 2014-05-08

Quad Summary: Topanga (3411815/112D)
County Summary: Los Angeles

Lat/Long: 34.07013° / -118.58707° Township: 01S
UTM: Zone-11 N3771068 E353550 Range: 16W
Mapping Precision: SPECIFIC Section: 20 Qtr: NW
Symbol Type: POLYGON Meridian: S
Area: 66.0 acres Elevation: 600 ft

Location: TOPANGA STATE PARK, ALONG TOPANGA CANYON BLVD, 1.1-1.6 AIR MILES S OF TRIPPET RANCH, SANTA MONICA MOUNTAINS.

Location Detail: MAPPED BY CNDDDB AS 2 POLYGONS NEAR THE COMMON CORNER OF SECTIONS 17, 18, 19, AND 20, NORTHERN POLYGON MAPPED ACCORDING TO A MAP IN A 1987 REPORT. SOUTHERN POLYGON BASED ON 2012 NPS DIGITAL DATA.

Ecological: MOSTLY ON EAST-FACING MOSS COVERED CONGLOMERATE ROCK WITH UMBELLULARIA CALIFORNICA, PLATANUS RACEMOSA, ALNUS RHOMBIFOLIA, RHUS DIVERSILOBA, AND BOYKINIA ELATA.

Threat: THREATENED BY DUMPING OF TRASH AND INVASIVE NON-NATIVE PLANTS.

General: LOCALLY ABUNDANT IN 1980. NORTHERN POLYGON OBSERVED AROUND 1984. 91 PLANTS IN SOUTHERN POLYGON IN 2010. A 1948 MORAN AND A 1967 WHISTLER COLLECTION FROM TOPANGA CANYON ARE ALSO ATTRIBUTED TO THIS SITE.

Owner/Manager: DPR-TOPANGA SP

Sources

AGU12D0001 AGUILAR, L. (NPS). SHAPEFILE OF OCCURRENCES OF SEVERAL SANTA MONICA MOUNTAINS SPECIES OF DUDLEYA. 2012-09-24.
ALL87R0001 ALLEN, L. & L. COMRACK. PRESCRIBED FIRE MANAGEMENT PROGRAM FOR TOPANGA STATE PARK. DPR, SOUTHERN REGION RESOURCE MANAGEMENT SERVICES. 1987-01-XX.
MCC14U0001 MCCABE, S. EMAIL REGARDING DUDLEYA CYMOSA SSP. OVATIFOLIA FROM ORANGE COUNTY AND THREATS TO REMAINING POPULATIONS. 2014-04-23.
MOR48S0005 MORAN, R. MORAN #3079 UC #1015362. 1948-05-28.
NAK80S0001 NAKAI, K. NAKAI #621 CAS #637301. 1980-06-08.
SAG12U0002 SAGAR, T. (SANTA MONICA MOUNTAINS NRA). EXCEL TABLE OF DATA FOR SEVERAL SANTA MONICA MOUNTAINS SPECIES OF DUDLEYA. 2012-09-19.
WHI67S0006 WHISTLER, A. WHISTLER #670423-2 UCR #16287. 1967-04-23.

Oncorhynchus mykiss irideus

steelhead - southern California DPS

Element Code: AFCHA0209J

_____ Status _____ NDDE Element Ranks _____ Other Lists _____
Federal: Endangered Global: G5T1Q
State: None State: S1 CDFG Status: _____

_____ Habitat Associations _____

General: FED LISTING REFERS TO POPS FROM SANTA MARIA RIVER SOUTH TO SOUTHERN EXTENT OF RANGE (SAN MATEO CREEK IN SAN DIEGO CO.)

Micro: SOUTHERN STEELHEAD LIKELY HAVE GREATER PHYSIOLOGICAL TOLERANCES TO WARMER WATER & MORE VARIABLE CONDITIONS.

Occurrence No. 7

Map Index: 34074

EO Index: 29844

_____ Dates Last Seen _____

Occ Rank: Unknown

Element: 1990-03-XX

Origin: Natural/Native occurrence

Site: 1990-03-XX

Presence: Presumed Extant

Trend: Unknown

Record Last Updated: 1996-12-19

Quad Summary: Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.06892° / -118.58689°

UTM: Zone-11 N3770934 E353565

Mapping Precision: NON-SPECIFIC

Symbol Type: POLYGON

Area:

Township: 01S

Range: 18W

Section: XX Qtr: XX

Meridian: S

Elevation: 500 ft

Location: TOPANGA CREEK, APPROX. 4 MILES WEST NORTHWEST OF SANTA MONICA, TOPANGA STATE PARK AND STATE BEACH, TOPANGA AND FERNWOOD.

Location Detail: TOPANGA CANYON FROM PACIFIC OCEAN UPSTREAM TO TOPANGA AND OLD TOPANGA CANYON TO HONDO CANYON.

Ecological: SOUTHERN SYCAMORE ALDER RIPARIAN WOODLAND, THICKETS OF HERBACEOUS UNDERSTORY IN MANY PLACES. THE STREAM'S HIGH-GRADIENT ASPECT, AND A WIDE BEACH AT THE MOUTH, MAY RESULT IN STEELHEAD PASSAGE PROBLEMS UNDER LOW FLOW CONDITIONS.

Threat:

General: STEELHEAD FROM 10-32 CM OBSERVED IN 1979. ADULTS FOUND IN POOLS UPSTREAM OF LAGOON IN 1990. TOPANGA CREEK HAS RELATIVELY HIGH POTENTIAL FOR STEELHEAD RESTORATION, BASED ON OBSERVED FLOW, SUBSTRATE, STREAM MORPHOLOGY, & RIPARIAN CONDITIONS.

Owner/Manager: DPR, PVT, CITY OF LOS ANGELES

_____ Sources _____

ALL87R0001

ALLEN, L. & L. COMRACK. PRESCRIBED FIRE MANAGEMENT PROGRAM FOR TOPANGA STATE PARK. DPR, SOUTHERN REGION RESOURCE MANAGEMENT SERVICES. 1987-01-XX.

TIT94R0001

TITUS, R.G. & D.C. ERMAN. HISTORY AND STATUS OF STEELHEAD IN CALIFORNIA COASTAL DRAINAGES SOUTH OF SAN FRANCISCO BAY. 1994-XX-XX.

Riparia riparia

bank swallow

Element Code: ABPAU08010

_____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: None Global: G5
State: Threatened State: S2 CDFG Status: _____

_____ Habitat Associations _____

General: COLONIAL NESTER; NESTS PRIMARILY IN RIPARIAN AND OTHER LOWLAND HABITATS WEST OF THE DESERT.
Micro: REQUIRES VERTICAL BANKS/CLIFFS WITH FINE-TEXTURED/SANDY SOILS NEAR STREAMS, RIVERS, LAKES,
OCEAN TO DIG NESTING HOLE.

Occurrence No. 288

Map Index: 84228

EO Index: 85255

_____ Dates Last Seen _____

Occ Rank: None

Element: 1907-06-XX

Origin: Natural/Native occurrence

Site: 1907-06-XX

Presence: Extirpated

Trend: Unknown

Record Last Updated: 2011-11-09

Quad Summary: Topanga (3411815/112D)

County Summary: Los Angeles

Lat/Long: 34.02966° / -118.52077°

UTM: Zone-11 N3766487 E359601

Mapping Precision: NON-SPECIFIC

Symbol Type: POINT

Radius: 1 mile

Township: 02S

Range: 16W

Section: 02 Qtr: XX

Meridian: S

Elevation: 14 ft

Location: "PORT LOS ANGELES" LONG WHARF, NOW WILL ROGERS STATE BEACH, PACIFIC PALISADES.

Location Detail: "A SMALL COLONY WAS NESTING IN THE BLUFFS NEAR THE LONG WHARF, PORT ANGELES." THIS WHARF
WAS LOCATED IN THE AREA OF WILL ROGERS STATE BEACH. THE WHARF WAS DISMANTLED DURING
1919-20.

Ecological:

Threat:

General: BIRDS OBSERVED NESTING DURING MAY AND JUNE OF 1907. CONSIDERED EXTIRPATED AS A BREEDER IN
SOUTHERN CALIFORNIA (SCH92).

Owner/Manager: DPR-WILL ROGERS/SANTA MONICA

_____ Sources _____

SCH92R0001 SCHLORFF, R. (CDFW). RECOVERY PLAN: BANK SWALLOW. DFG NONGAME & MAMMAL SECTION REPORT 93.02.
1992-12-XX.

SHE08A0001 SHEPARDSON, D. NOTES ON THE NESTING OF THE BANK SWALLOW. CONDOR 11:174. 1909-XX-XX.

Vireo bellii pusillus

least Bell's vireo

Element Code: ABPBW01114

_____ Status _____ NDDB Element Ranks _____ Other Lists _____
Federal: Endangered Global: G5T2
State: Endangered State: S2 CDFG Status:

_____ Habitat Associations _____
General: SUMMER RESIDENT OF SOUTHERN CALIFORNIA IN LOW RIPARIAN IN VICINITY OF WATER OR IN DRY RIVER
BOTTOMS; BELOW 2000 FT.
Micro: NESTS PLACED ALONG MARGINS OF BUSHES OR ON TWIGS PROJECTING INTO PATHWAYS, USUALLY WILLOW,
BACCHARIS, MESQUITE.

Occurrence No. 552 Map Index: 35233 EO Index: 93051 _____ Dates Last Seen _____
Occ Rank: None Element: 1897-05-29
Origin: Natural/Native occurrence Site: 1897-05-29
Presence: Possibly Extirpated
Trend: Unknown
Record Last Updated: 2014-04-03

Quad Summary: Beverly Hills (3411814/111C), Topanga (3411815/112D)
County Summary: Los Angeles

Lat/Long: 34.01962° / -118.48594° Township: 02S
UTM: Zone-11 N3765326 E362802 Range: 15W
Mapping Precision: NON-SPECIFIC Section: XX Qtr: XX
Symbol Type: POINT Meridian: S
Radius: 1 mile Elevation: 100 ft

Location: SANTA MONICA.

Location Detail: MAPPED GENERALLY TO LOCATION DESCRIPTION OF "SANTA MONICA." EXACT LOCATION UNKNOWN.
LOOKING AT HISTORIC TOPO MAPS FROM 1894, 1896, & 1903, ITS POSSIBLE THAT THE COLLECTION WAS
FROM PRESENT DAY PACIFIC PALISADES OR BALLONA CREEK.

Ecological:

Threat: DEVELOPMENT SINCE THE DATE OF COLLECTION HAS LIKELY ELIMINATED NESTING AND FORAGING
HABITAT.

General: UNKNOWN NUMBER OF EGGS COLLECTED ON 29 MAY 1897 BY H.G. RISING (WFVZ #115577).

Owner/Manager: UNKNOWN

_____ Sources _____

RIS97S0001 RISING, H. (WESTERN FOUNDATION OF VERT. ZOOLOGY). WFVZ EGG COLLECTION #115577. 1897-05-29.

PROOF OF SERVICE
STATE OF CALIFORNIA- COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1299 Ocean Avenue, Suite 450, Santa Monica, CA 90401.

On December 15, 2016, I served the foregoing document described as: **City of Los Angeles APPEAL From Coastal Development Permit Action**, by placing true and correct copies thereof to the following parties and/or individuals:

SEE ATTACHED SERVICE LIST

(X) BY FIRST CLASS MAIL POSTAGE PREPAID AS FOLLOWS: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date, following ordinary business practices, in the United States mail at Santa Monica, California.

(X) I caused such envelope(s) to be deposited in the mail at Santa Monica, California.

() BY OVERNIGHT MAIL: I placed a true copy of said document in a sealed **FEDERAL EXPRESS** envelope addressed as indicated above, with delivery fees provided for, and, deposited said envelope in a box regularly maintained by **FEDERAL EXPRESS**, for next day delivery.

() BY EMAIL OR ELECTRONIC TRANSMISSION: I caused said document to be delivered by electronic mail to the e-mail address(es) as listed above.

() BY FACSIMILE TRANSMISSION: I caused such documents to be personally delivered to the parties at the facsimile numbers listed above.

() BY PERSONAL SERVICE: I caused such documents to be personally delivered to the person(s) listed above.

Executed on December 15, 2016, at Santa Monica, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Nanci VeSota

SERVICE LIST

1 Tina Shim, Esq.

2 Deputy City Attorney, City of Los Angeles
3 Los Angeles Department of Water & Power
4 111 N. Hope Street
5 Los Angeles, California 90012

6 City of Los Angeles Department of Public Works, BOE EMG
7 Attention: Catalina Hernandez, Environmental Supervisor
8 1149 S. Broadway, Suite 600, Mail Stop 939
9 Los Angeles, California 90015-2213

EXHIBIT III

PETITION TO


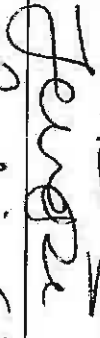

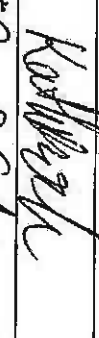





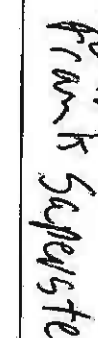
Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:







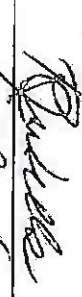
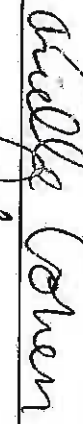


- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Louise Imms		840 Harbor View Rd. #15	louise@groundzero.com
Jenna Rose		10746 Tanager	— NA
Pauline Githens		2820 Exposed Blvd.	Pauline Githens@gmail.com
Kathy Jordan		1866 Charnel Lane	Kathy.Jordan@gmail.com
ED MOSKOWSKI			ed.moskowsky@gmail.com
Ann Powers		1583 Cade Patricia	palisadespt@aol.com
Hugo Lopez		1310 N. Teakwood	h3m3lth3@comcast.net
Walter Westfall		1766 Palisades Dr.	Westfall@jchoo.com
Ann Peterson		1446 Palisades Dr.	ann@redme.com
Frank Superstein		1668 Michael Lane	Frank@supersteins.com

1 1

1

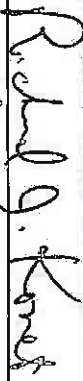




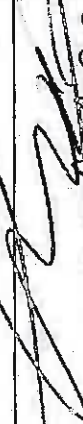




<p>Petition Summary and Background:</p>	<p>The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.</p>
<p>Action petitioned for:</p>	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Tom Creed		516 Brent Ave	tom.creed@gmail.com
Richard E. Jones		1695 Lytle	vgreentree@gmail.com
E. Jones-Sawyer		1805 S. Wilton Pl.	ehendricott.net
Sylvana Holman		1835 S. Wilton Pl.	s.e.holman199@gmail.com
Steve Cervantes		1824 2nd St	SteveCervantes@gmail.com
Margie Higgins		823 S Longwood	mehiggins12@gmail.com
Richard Wells		315 S. Westgate Ave	Richard@westgate.com
Arnelle Cohen		1160 Ravoli Dr.	arnelle.cohen@gmail.com
Barry Blair			
Terse Martin		1029 Via Dela Paz	phourbaseball@gmail.com

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquies in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.		
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>		

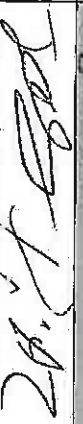









Printed Name	Signature	Address	Email
Richard G. Konec		516 San Vicente, SM	rkonec78@gmail.com
Bobbie Louise Bohman		1004 Briarwood Ave	bobbiebohman@gmail.com
Thomas Isck		1140 Embury ST, PP	TIsck@earthlink.net
Jim Schneider		720 Toiyoga Dr PP	timothy.schneider@no.com
William Damsport		720 Toiyoga Dr.	Pa.laurel@no.com
Went Strohbe		4871 Berryman Ave	Trem0201@yahoo.com
Debra Kenean		8309 Alcott St	olga.h@yolus.com
Michael McDonald		16746 Barnimere Dr.	
Debra Kenean		1152 Hartzel St	m.m.w@no.com
Karen Ford		9555 Wilshire Blvd.	doubl@no.com

BP 90212

PETITION TO

Protect Sunset Boulevard's Scenic Highway!


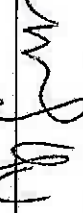

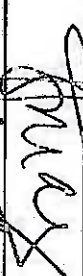


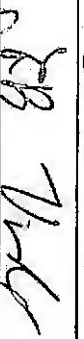



Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
JOSE DIAZ		7106 Sheinhardt	
RESISTANCE		15330 ALABAMA	
SHIRLEY HERNANDEZ		7214 E. MARY	
PHIL SHANAHAN		12021 W. Lushine Blvd, #162	SOLY@CISCO.ETHNOL.COM
MARY STANMANN		"	FIREHorseAve@earthlink.com
Cesar Lopez		290 E 96th Los Angeles	cal391@gmail
Amos Shuler		932 Rivas Canyon,	amosshuler@yahoo.com
ROBERT JACOBSON		1166 McPherson Ave Palmdale	RTJ12@earthlink.com
Cherdy Herrera		765 Almond Av. Pa. P.	cherdyherra7@aol.com
Alex Blomberg Hill		717 Hensley Ave	metrofeed@gmail.com

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Shannon Newell		16962 Ave De Santa Ynez	shannewe@yahoo.com
Mae Tu		1664 Michael Ave	
Melissa Moline		501 Biornomedz Ave	tdtranscript@gmail.com
Ismae Ardon		20214 Obhase 750	
Hocmy Alvarez		14700 Federal St	
Sarah Cepano		10605 Linda Ter	
LB Viohi		387 Armo Way	
J. MARELLA		1846 MILLE-	
Rafaela Feline		939 Fiske	Robstone@gmail.com
Craig Werten		763 509019 Dr	

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.


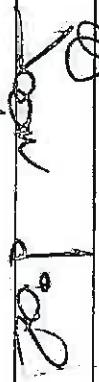





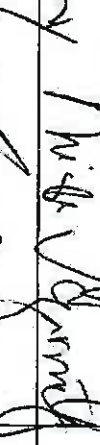


Printed Name	Signature	Address	Email
Mary Davis	Mary Davis	16772 Edgar St P.O. Box 10272	sgndupree50@yahoo.com
William Wille	William Wille	730 Webster Ave Apt. #44	_____
Royce Santelen	Royce Santelen	121 N. Hollywood Ave #2	_____
Eva Herasovitz	Eva Herasovitz	633 - JG COB	_____
Antonio Dellana	Antonio Dellana	7823 11th Ave. Astoria	orelande@gmail.com
John Mac	John Mac	1114 Chautauque Blvd	jennmcc@gmail.com
Michael Rose	Michael Rose	15332 Arched St 90272	whaeb@mail.com
Julie Kalous	Julie Kalous	16640 Via Pacifica #9	_____
Deborah Jones	Deborah Jones	Boonville, Montana	_____
Patty O'Donnell	Patty O'Donnell	11411 Chenoat #310 Brentwood	_____

90049

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
John Sandberg		8885 Brandee Ave	jsandberg@gmail.com
Joan Doe		2043 Locos Ave	K.L.Doe@hotmail.com
Jordan Goldstein		870 N Carnation Ave	jgoldstein1@hotmail.com
Rosario Duran		952 1/2 Hyde Park Blvd	cuchurina@chahal.com
William Fagoso		Livorno Dr.	
Thelma Sherman		1500 Saltair	
Eric Mayo		3611 MacLaughlin Ave	EricMayo31@gmail.com
Nicole Symonshy		11515 Sunset Blvd.	meeto@gmail.com
Benjamin C. Treas II		630 Baylen Dr	
John Doe		16630 Marlene Ave PM	16630 Marlene Ave

482 W. Knolls-Panamahy
 @msn.com

PETITION TO

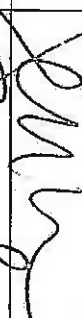



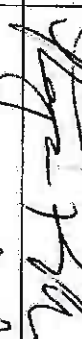




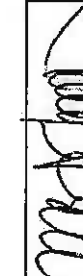
Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
JENNIFER		16123 SUNSET	jennif1425691027@aol.com
REDDO LOVERO		527 STARR C	
JANEY BUSBY		6947 B BARTON ST.	
BON GARCIA		1220 Loma Lomas Pkwy	garvey16404@gmail.com
REGAN FILLIPS		17091 Palisades Circle	reganann@gmail.com
JERRY LINDL		641 Alma Real Dr	jclindl@gmail.com
LARA SCHWADER		621 Swarthmore Ave	
MARTIN LARSON		15806 Cedar	
LOWMEYER		21341 Hillside Dr	
BARRY TERRELL		2113 Swarthmore Ave	

PETITION TO


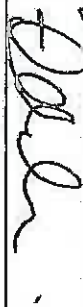



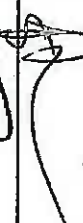




Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

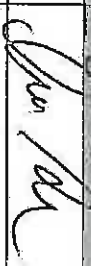


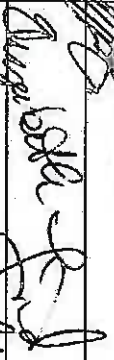




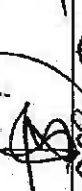
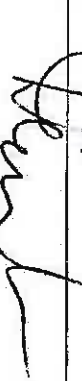
- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Wendy Bell		1200 LATHAM AVE	nicholabuckleyphotography.com
William Denison		16772 Mendocino Dr	william-denison@earthlink.net
Alyshe Turner		756 Chapala Dr.	ayshe72@gmail.com
Shea Morris		807 Radcliffe Ave	PPCA-00272@earthlink.net
Alexandra Kateletsky		11972 Chalon Rd	kateletsky.sasha@gmail.com
Dana Nelson		512 Abraham	D5flume@gmail.com
Jim May		1411 CAUSEWAY	
Chris Corbett		631 Topanga Dr.	ChrisCorbett@gmail.com
Joselyn Bell		13830 Quince St	
LINDSEY CRAFT		16133 Northfield St	LINDSEY.CRAFT@gmail.com

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.		
Action petitioned for:	We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.		

Printed Name	Signature	Address	Email
Alfonso Sosa		3213 NEBRASKA #2 - SANTA MONICA 90411	ANTONIO.SOSA.2003@yahoo.com
Carmen Castillo		1401 Euclid Ave Sta Monica CA	
Michael Madson		1807 W. Sunset Blvd Rm. 1010 Los Angeles 90027	
Ellenbeth Lind		9571 Granada St.	lilabubird@gmail.com
Yasmin Lilly		15230 24 Dicken	jan243t@gmail.com
Suzie Delac		1007 Pacific St Santa Monica 90405	
Loean Kolles		9618 Exposition Blvd LA 90034	theioan.kolles@gmail.com
Susan Munn		1714 Michael Ln, R	youngmunn@yahoo.com
Secm Wolsefer		1383 Pal Drive	wolsefers@gmail.com
J. Martin		16308 Kona Ave 90409	ARMSTRONG@Yahoo.com

PETITION TO



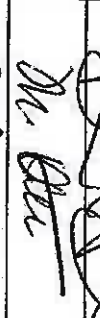

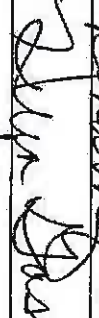
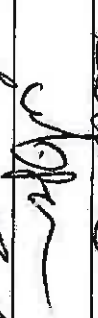
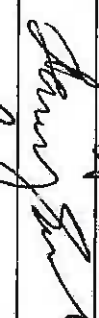


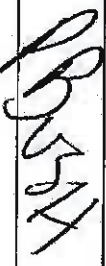
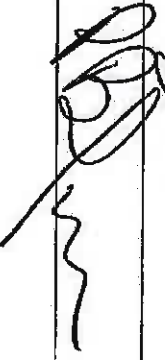
Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:




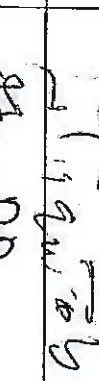




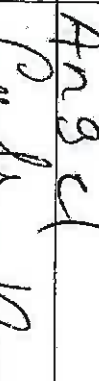
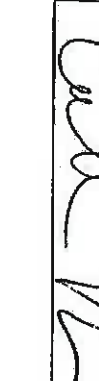
- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	E-mail
Heather Little		514	heather_lof5@hotmail.com
Alexis Duvve		520	lexid109@aol.com
Mari Ott		17724 Carmel Palisades	
Blanca Chaves		555 Palisades Dr	
Helen Gaslin		1437 Alb Del Jonckh	helen.gaskin@yahoo
Mike Gomer		17019 Sherman way	unfance57@yahoo.com
Amy Franco		7301 Capistrano Ave	amyt11b@a@yahoo.com
Sonya Reese		11353 Ovada Cir	hogiscl@ix.netcom.com
Anne Gault		506 N. Los Car	
		720 E Florence St	STARDANCE@aol.com

2 2

2 2

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.


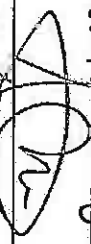








Printed Name	Signature	Address	Email
Olivier Jorgensen		17257 Palisades Dr	olivierjorgensen@gmail.com
Terri Eisenberg		521 Via de la Paz	ie766@aol.com
Michael Lee		417 August	michael1711@gmail.com
Richard Baker		900 Via De La Paz	
Florence B		800 Via de la Paz	
Carol Gray		1201 Under the Palms	chuckstrong@gmail.com
Donna		1544 Michael Lane	jreg70@earthlink.net
Joann		9150 Florence Ave.	
Lorena			latacamsg@hcc.com
Carla Davidson		1660 Calle Jermaine	davidson.carla@gmail.com

2

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

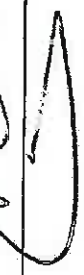




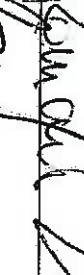




<p>Petition Summary and Background:</p>	<p>The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.</p>
<p>Action petitioned for:</p>	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Ludmila Kozova		1208 Monument St. Pacific Pal.	
Palmo Murphy		16414 Bollinger Dr. P.T.	
Kevin Temmies		12374 RINGE CIRCLE	
LISA LEVYA		21655 CRETEVA 90240	
Charley Levya		21655 Circle TRL 90296	
Douglas Pagett		407 Almar Ave 90272	
Leslie Horice		16901 Laurel Blvd	
GAIL MARQUEZ		16901 Sunset Blvd.	
Carmen Sehnal		2955 Munroe Drive Mel.	
Gis Marvsky		16160 Horvitz Rd	

PETITION TO

Protect Sunset Boulevard's Scenic Highway!











Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
J. Dutton		16432 Alond Dr	
A Lewis		14815 Drummond St RP	
J. Fildon		29 Alma Dr RP	
S. Nguyen		22000 Melley Lane Torrance	Sam Nguyen
G. Pichel		657 Muskingum Ave P.P.	
R. Pichel		657 Muskingum P.D.	
B. Morin		11841 Mayfield Ave #5, LA	
Ann Cunnaco		757 Wilshire Dr	
Lina Totento		840 Haverford Ave.	
Kathie Sevens		1350 Bever Place	

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

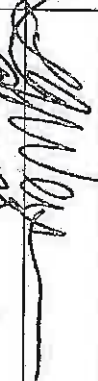
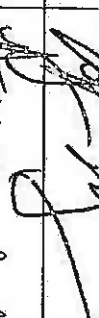

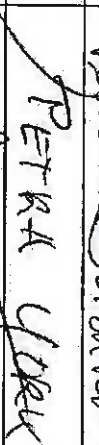
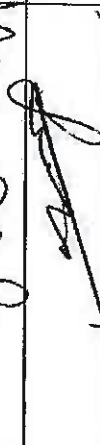

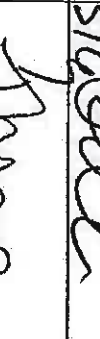
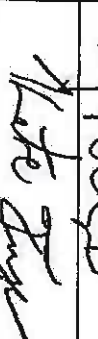


Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Paul Monsuro		6891 Palmdale St. Apt. 2	
Lucio Maldonado		22160 Wilwood CA. 90303	maldonadelucio28@yahoo.com
Stephen Stream		1330 Palmdale M, P.B.	
Stream		47 Palmdale Rd	
Diana		3607 Seaborn Drive	vitto13@peoplepc.com
Shayla Dionne		17959 Seaborn Drive	celbiatad133@gmail.com
Mary Payer		12605 Village Ct 90994	MarymPayer@yahoo.com
Jenny Payer		12615 Village Ct 90994	Jenye2@yahoo.com
Ben Brandler		17795 Calle De Palmdale	brandlerben@comcast.net
Christina Payer		18920 Ave. R	payersc4@gmail.com

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.		
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>		

Printed Name	Signature	Address	Email
Lynna Weygraue		26 Surfer Way	lynnw@comcast.net
Robert Norman		1316 2nd Street S, Sherman Oaks CA 91309	
Amie Welter		562 W 99th LA CA	
Deborah Shishko		16510 Las Casas Pl-P.P.	
Pete Whelley		15720 Belter	
Sergio Castro			sergiocastro@yahoo.com
MARISA LAVEQUE		802 Harvard St PP	
Bonnie Lentsch		1128 Amarel Way	Bonnie@calnet.com
T. Nymarko		17230 Sunset	
Kate Frige		4091 Pacific St	

Protect Sunset Boulevard's Scenic Highway!

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pad-Mounted System.

- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

~~Exhibit 4~~

PETITION TO



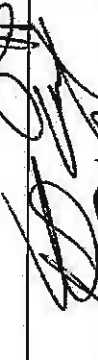
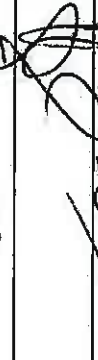




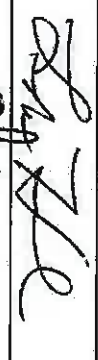

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquee in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
DEBRA STADDM		629 ELKINS DR. PP.	
Daniel Scott		70139 Delta Dr	dscott921@gmail.com
Kinsey Davis		16821 Marquez Ave	
Holly Forbost		718 Radcliffe Ave	hforbost@gmail.com
Sammie Linker		12727 Mattman Ave	sammie3@gmail.com
Hunja Koinbini		4534 Pinalone St	hunja@comcast.net
Susan West		1549 Pichard Ln	_____
C Monaya		744 Orange	_____
L. Tamlin		800 Alma Real Dr	_____
Angel Mancias		232E 34th St 90611	_____

PETITION TO




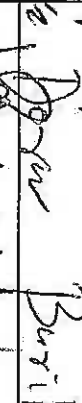

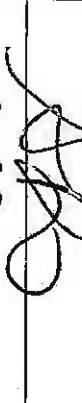
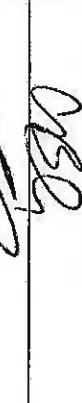

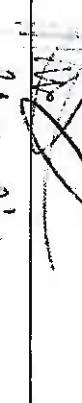

Protect Sunset Boulevard's Scenic Highway!

Petition Summary
and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Khosravi		910 Embury Street	myola.hollywoode@alcom
Ira Rosen		16749 Edger St	irarosen@mac.com
Mireya Ramos		318 Sartorius Dr	
Don Brault		906 Fitzgerald Ave	
Wilda Brault		9016 Fitzgerald Ave	wilba@verizon.net
Sage Brunes		889 Hatfield St.	Davissage@hotmail.com
Catherine Cramer		832 HARTZELL ST.	
Erin Gardiner		361 Mt. Holyoke Ave	
Jim Sigmond			
Glenn Munkin		1247 W. 51st St - 1A.	

PETITION TO









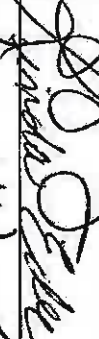

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Doreen Adams		8009 La Brea Hwy	
Steve Tyrick		511 Lombard Ave	
Melanie Speiser Melbury		658 Eastman Dr.	Melanie@meandgraph.com
Jane Ross		820 Via Dela Rey	
Frank Mann		15234 Friends St.	marrickbradine@yahoo.com
Katharine Schigian		201 5th Ave 90291	Kthorne@Eastlink.ca
John Walsh		533 Suvannaree Ave	netfred@earthlink.net
Glenn		411 Benita Rd.	
Linda Edey		800 Via De La Paz	Edey@Shoglow.net
Mari Weaver		1151 Embury St. Rm 90272	Weaver Marie@hotmail.com

PETITION TO




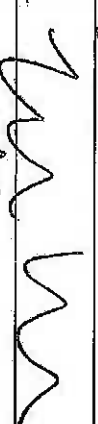






Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Jessie McKernan		16070 W. Sunset Blvd.	deborah@cheetahmail.com
Jennifer Lewis		17103 Palisades Cir	jennhanna@yahoo.com
Julie Chen		3905 Malibu Vista Dr.	julie@red.com
Janet Miller		16421 Marquay	indymil@earthlink.net
Karen Petrakis		728 Jacob Way	kyris2002@yahoo.com
Sherryl Jones		1448 Palisades Dr	blue2muse@yahoo.com
Cristina M.		1085 Palisade Pl	Wst
Scott Davies		716 Sunset Avenue E1A25	ScottDavies@msc.com
Claudia Molina		216 S. Palms Grove Hwy, LA, CA 90016	
Raleigh Jones		2424 Wilshire Blvd.	Raleigh.Jones@me.com

PETITION TO




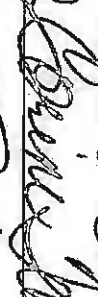


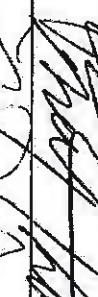



Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquies in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Eric Danner		863 Bulfinch St. PP	eric.edanner@gmail.com
Abby Casey		1006 Monument St.	abbyscasey@gmail.com
Nicole Danner		902 Finbury St	NDanner@gmail.com
CORINE TARKER		15101 Sunset Bl.	CORA.T@AOL.COM
Mike Luong		881 Alhambra Road / Dr	luongmike@gmail.com
Mike Davis		651 Ocean	mtantrndog@gmail.com
Gary Ruskoff		5110 33rd 5004	GARYRUSKOFF@gmail.com
WILLIAM BOLANDE		19111 POLETOP MARQUIES BLVD	WILLIAM.BOLANDE@gmail.com
Katie Eason		8910 Topopa Rd	Katie.Eason@chaparral.com
DAVID KRAMER		630 Larchmont Ln.	KRAMERPT@gmail.com

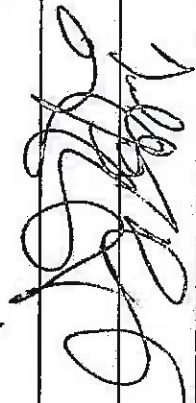
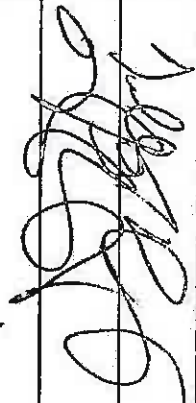

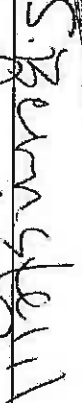


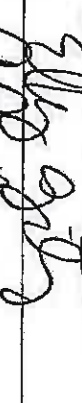



WEEK 2

WEEK 1

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	E mail
Tim Davis			tdavis123@gmail.com
Wayne Sullivan			tsullivan@gmail.com
Michael Wilson			MichaelWilson11@aol.com
Sandra Bernstein			Sandra.Bernstein@gmail.com
Debbie Price			Saester@aol.com
Sylvia Barker			svbarker@gmail.com
Elizabeth Gillen			elizabethgillen@mac.com
Alisa Burt			alisa.burt@gsu.edu
Vicente Morales			vica94@yahoo.com
Carmen Hawley			Vica94@yahoo.com

PETITION TO

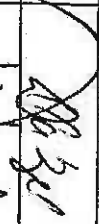









Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:











- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
DAVID CATELL		16123 W Sunset #202 Pacific Palisades, CA 90272	DCATELL@PCC.OE
Toby Lubin		16123 Sunset Blvd. P.P.	toby.lubin@aol.com
MONIQUE THORNTON ^{LEWIS}		1358 Buena Vista Dr. #1	
MARLENE ASLEY		1358 Buena Vista Ave. #1	
SCOTT SIMMEL		29 Kontek Way 90272	
DANNE CLUNCH		14511 W. Sunset Blvd 90272	NO emails please
CAROL FREUE		2525 Wilshire St W	C.Krull@verizon.net
PAUL SCOTT		5747 Panamint Ave	rscoth305@ndhsstudent.org
EST ^{EST} LISA SCOTT		1617 N. Panamint Pl.	
PAUL ISRAEL		943 Liff St.	

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Dennis Kleinman		11655 Garman Ave LA 90249	ditplus@gmail.com
Julia Teibatch		1711 Amherst Ave, LA 90025	missjules@aol.com
Natalie German		1816 Lindero Ave	nataliegerman@gmail.com
Arice Woods		11452 Cederblower	alexwvols@gmail.com
Tim Olsen		11782 Cady de Arica	tisosalnic@gmail.com
Aileen Schelba		11405 Forster Pl	aileen.schelba@gmail.com
David Thomas		16535 Alhambra St	monica1208@aol.com
Monica Thomas		16535 Alhambra St	monica1208@aol.com
M. Walsh		1152 Hartford St	m.walsh@verizon.net
R. Hill		6027 Brookfield St	Toledo, OH 43015

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquee in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
S. Raisa		16750 Via Pacifica	RAISAESTRADO@gmail.com
EMANE MARCEL		16584 Via Pacifica	EMAME@gmail.com
DAVID MARCEL		" " "	DMARCEL@gmail.com
Marta Cereghino		704 Waterford Ave	RTSMC24@aol.com
Michael Dickerson		15101 Sunset Blvd	palisadesmike@gmail.com
Jaye Bell		16459 Sunset Blvd #5	jayebell1985@yahoo.com
ANA RAMOS		" "	RAMOSANA1989@yahoo.com
Dana Stevens		526 Arbramer Ave.	danastevens@aol.com
Frank Rivera		1529 Day St. Los Angeles	mi.4723370@gmail.com
Jay Sae		28025 Hobart BL	-

LAC

PETITION TO




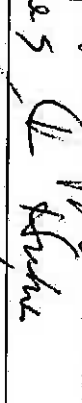






Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:







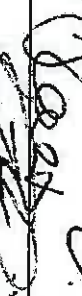


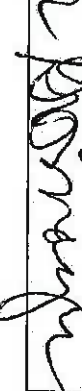
- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Patricia Adams		16130 Northridge St.	denic303@aol.com
Rick A. Boeten Rithke, BSW		16832 Boulevard	GUN4AB@TODGMAIL.COM
Ron Darling		1922 Bentley	LA
Carolyn Holmes DeStine		611 EL VERDE PL	P.F
Suzi Honeran Suzi Honeran		13000 Chautauque Bl	SKTUNSGAN@AOL.MILK.NET
Susan Pank		660 El Medio Ave	
Billy Ferensch		16300 Shadowmont Dr.	E Ferensch@yahoo.com
Lilliana Zar		16926 Dulce Ynez Ln.	
JANE WARD		501 N.W.S. CASS AVE.	JWETAG@GMAIL.COM
CARNECIA WARD		1429 Wilisates Dr.	John Peters @ gmail.com

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

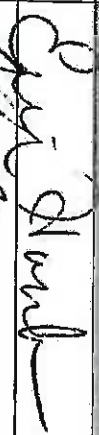

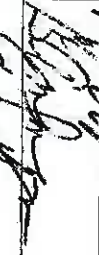



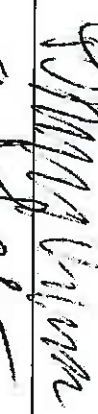
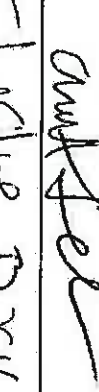

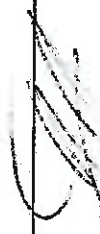
Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Sarah Newman		306 N Kenten Ave, Brentwood	Sarahnewman70@gmail.com
Diane Samson Roman		255 N. TEARAWAY RD 90272	chudchamberlain@aol.net
Francielle Rubin		15791 Helicon Ave, Pacific Palisades 90272	frhinc@aol.com
Gloria Kim		16509 Alkam St, Pacific Palisades 90272	GloriaK1@aol.com
Patrice Howard		604 Palisades Dr, Pacific Palisades 90272	PatriceH@aol.com
Shari Robe-Barnett		30533 Inland Way, Pacific Palisades 90272	sharipoe_barnette@aol.com
Petra J. Cleary		1122 Chasm Acres Place, Pacific Palisades 90272	petra.j.cleary@aol.com
LEANDRO CARRASQUELO		15515 SUNSET	locussell@rovernet.net
Carolina Perez		15515 SUNSET	Meonlight1766@hotmail.com
Gregory Mosler Kohnen		720 WACAMER	gkohnen@earthlink.net

PETITION TO

Protect Sunset Boulevard's Scenic Highway!



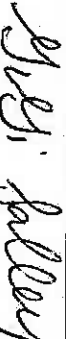
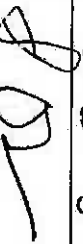
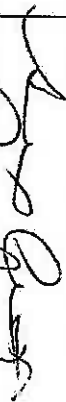



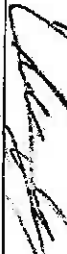
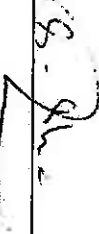
Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Evie Harrah		1500 Serrento Dr.	evieharrah@yahoo.com
Mar. Brian		16513 Sunset Blvd	mari.pauleng@gmail.com
A. Ammon		501 Palisades Dr	babyzic@att.com
Richard Plazek		16809 W. Sunset	RICKPLAZEK@GMAIL.COM
Robert Degeest		12041 Culver Av.	
Jack W. Spar		16272 Bellinger Dr.	
Ryley Nakura		17731 Revello Dr	RyleyNakura@aol.com
Chad Spencer		16641 Alton St.	ChadSpencer@gmail.com
Shane		16834 Marjorie Ave -	
Chris DeSilva		16706 Marquez Ave	

1 PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Wile Duaneau		16011 Marmon Ave Pacific Palisades 90272	W.Duaneau@gmail.com
Carmie Garcia		16636 Marquez Ave Pacific Palisades CA, 90272	carnecgarcia@gmail.com
Alisa Sallee		16636 Marquez Ave Pacific Palisades Ave	alisa.sallee@yahoo.com
Alvaro Osorio		116636 Marquez Ave Pacific Palisades CA	alvaro982@yahoo.com
Alta Maron		8711 Osorio Pl Pacific Palisades CA 90272	713calexmaron@gmail.com
Robbi Sanchez		8711 Osorio Pl Pacific Palisades CA 90272	SancheR@aol.com
Shirley		1128 Osorio Ave Pacific Palisades CA 90272	
Mark Camus		1436 A Pacific Dr. Pacific Palisades	
Cristian Aguirre		18424 W Sunset Blvd	ChbA@hotmail.com
Emily Shogren		1734 Palisades Dr.	gautyela@yahoo.com

PETITION TO








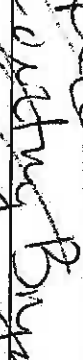


Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquee in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Stella Allen		23823 Malibu Rd 378	lorisjennalove@yahoo.com
Reggie Lee Calder		15424 Sunset, PP	_____
Shirley Calder		138 Palisades Dr	_____
Nihans Solter		1556 Palisades Drive	Nihansfo@yahoo.com
Irene Collier		16199 W Sunset Blvd	_____
Pat Collier		704 15th St Santa Monica	_____
Logan Collier		16179 W Sunset Blvd	lcollier@yahoo.com
Carlyng Bryson		825 Jacon Way	_____
Tom Bedard		1415 Chautauque Blvd	_____
Noel Kleinman		11655 Gowerman Ave #6	NOEL@NKIX.COM

PETITION TO







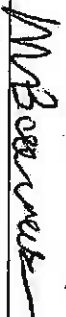

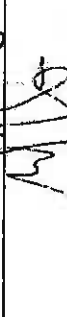

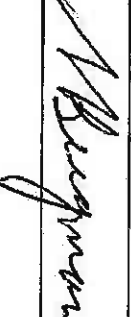
Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

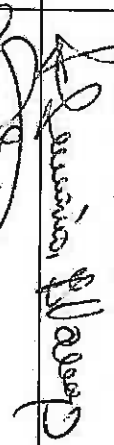


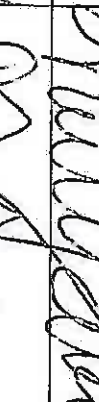

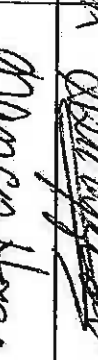
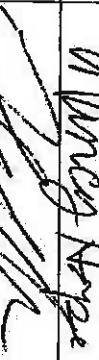

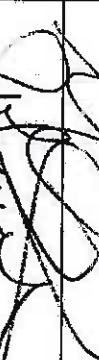

Printed Name	Signature	Address	Email
Art Ayeroff		315 Via de la Paz	7-
Murphy Lawrence		920 11th St 30.	
Nancy Miller		15101 W Sunset Tr	ao3@aatt.net
Nancy Driver		15101 W Sunset Tr	115amv-87@nottmail.com
Lisa Rico		1041 Will Rogers Street	
March Beaver		162 Hampden Pl. 99	
Sarah Brimmer		16765 Chermel Ln 99	09112-0201.caw
Marion Uno		3777 Ken La Bon Winding	
Julie Temp		746 Hartford Loc.	
S. Bergman		345 Canals Dr	

Sum 90402

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Ismañio Vargas		17383 Sunset Blvd PP 90242	6562man2373@yahoo.com
Lise Delancey		16555 Dutton Ave PP 90242	joieilpelanco@gmail.com
Kathy Morale		14821 Marquez Street 13710 Formosa Ave A-Mesa	
Nicole Bata		1180 Bunker Attia Court	1mbata3010@gmail.com
TASSIA VIERA		Sunset + Blvd	tassia.viera@gmail.com
Morgan Asher Zach		16927 Sunset Blvd. Palmdale	Morgan@yaho.com
Money Hype		730 Palisades Dr	
Heather Muske		17267 Ave de la Peninsula	heathermuske@yahoo.com
Nicki Muhl		4338 Palms Dr	nicki.muhl@aol.com
Walter Castillo		6111 Palisades Dr	waltercastillo.net

१

१

१

१

१

१

PETITION TO







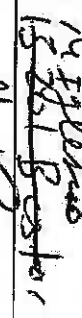


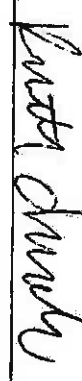
Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approval. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Carli W. West		3832 SURFCLIFF BLVD PACIFIC PALISADES	Carli.West@adl.net
Sandy Alvarado		609. Saverthorne Ave	Sandy.alvarado@gmail.com
Robert J. Martinez		821 Via De La Paz Palisades	robertmartinez@gmail.com
Ana Castro		800 Via de la Paz	
Rosy Lazo		3856 Malibu Vista Dr. PACIFIC PALISADES	la21788@hotmail.com
MICHELLE LAFAYETTE		15480 Astoria #203	M.LAFAYETTE@OUTLOOK.COM
M. Iglesias		13201 Bestor Blvd	mariagiglesias200@gmail.com
Alexandra		14233 Bestor Blvd	leypold.ale@gmail.com
Daniel Bransome		2456 Auburn Dr	danielbransome@gmail.com
Ruth Alvarado		569 Mountain Holmdene Pacific Palisades	alvaradoruth@yahoo.com

PETITION TO


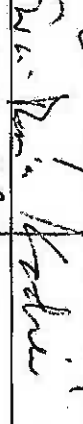
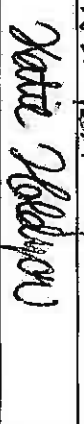

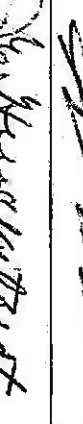

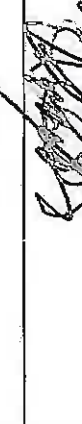



Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Printed Name	Signature	Address	Email
Elwood Foster		548 Palisades Dr.	Elwoodfoster@sbcglobal.net
EMMA-KADIE R. KADIE		1633 Truckee Ave.	
Katie Holdych		17029 Livorno Drive	
Jun S. Kim		534 Palisades Dr.	
Joy Huerfano		1712 Avenida De los Hernandez	
DAVID LINH		534 Palisades Dr. Pacific Palisades 90272	
MARQUE BLAS		534 PALISADES CA, 90272	
Alithi Plamenitsky		524, Palisades Dr, CA, 90272	
Thomas Soladnos		584 Palisades Dr. 90272	
Allan Hunter		1231 Los Comus Pl. 90572	alanhunter1007@gmail.com

2

PETITION TO


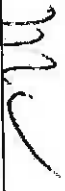


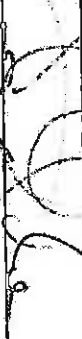



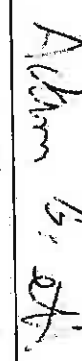

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.











Printed Name	Signature	Address	Email
Deb Beck		1231 415 20th St Bldg PH-L	
McKENNA		520 Palisades Dr.	
Brett Anderson		861 Jackson way	
Erik Grimes Jr		4334 Normal Ave #2	
Fredie Lobo		1522 A. Sanguinetti Ln	
Chris Martin		1414 Christian Plany	
David Wilson		18 Margen St + Bell	devidewilson-777@y
M. f. a. Zahed		11740 Wilshire Blvd	
Dr. Ayi		1283 Palisade Dr.	
Jess Lohman		669 Jacson Way	

N

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.		
Action petitioned for:	We, the undersigned, are concerned citizens who urge our leaders to act now to a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System. b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.		

Printed Name	Signature	Address	Email
Stara Regen		17163 Palisades Cir PD	coastcush@gmail.com
MARCELA LEON		16516 PALISADES PL MARQUEZ SCHOOL PO BOX 34442 LA CA 90034	MARCELA.LEON@VA.C
John Drake			
John Drake		1389 Palisades Dr, P.O. 90372	jd1ter13@gmail.com
MARIE LEIRIE		1389 Palisades Dr 90372	marie.leirie31@gmail.com
Gita Kharva		PO Box 410 PD	-
Bruce Mendenhall		3211 SUTWOOD RD	3420@BANDONMATH.COM
Natalie Clark		9921 - Anna Road	natalieclark@gmail.com
Carl Marshall		76 Summit Ave, Brooklyn AND COAST	-
mail waring		8029 Olympic Blvd SMC	mail-nrc@hawaii

✓








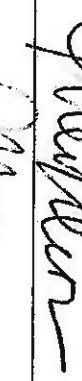


PETITION TO Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

Action petitioned for:

- We, the undersigned, are concerned citizens who urge our leaders to act now to
 - Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
 - Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.



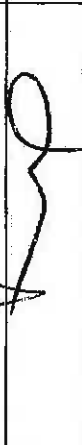
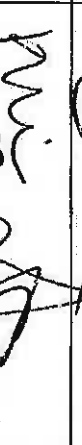
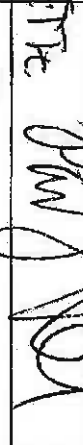




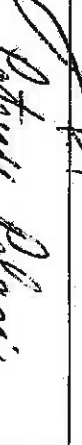
Printed Name	Signature	Address	Email
Willen Platt		17441 Weddington St Encino 91324	mrzaplatte@mac.com
Althe Schaefer		11456 Garbourn Ave LA 90049	
Roberto Gomez		15266 The Park	
Walter Rabin		17320 Catline Dr	VP2554@comcast.net
Russ Kaplan		16324 Pacific coast hwy	klap@derick@spatrol.com
Amey Lehr		871 Laguna St	amylehr@gmail.com
Paige Leachman		1522 Antioch	paigeleachman@yahoo.com
Lili Eichler		219 Adams Way	demerill@leiguel.com
Danay Carter		7411 21st St PP	Danaycarter@att.net
Libby Pillsbury		15256 Fremont St	

2

PETITION TO

Protect Sunset Boulevard's Scenic Highway!

Petition Summary and Background:	<p>The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.</p>
Action petitioned for:	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to</p> <p>a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.</p> <p>b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.</p>

Printed Name	Signature	Address	Email
Tony Motes		801 Badger Ave	tonymotes@aol.net
Dan Brown		9817 Lytle Court	lytlehills@gmail.com
John Green		20500 Seton Way Torrance	johnsgreen@gmail.com
Kaci Williams		1035 Gallows St.	pacificpalisades@gmail.com
MATTHEW WHITE		1463 Palisades Dr.	PACIFIC PALISADES
Marcelle Raderer		1463 Palisades Drive	marcelle.raderer@att.net
Lynette Blum		1350 Avenue de Corneille	lynetteblum@yahoo.com
ARTHUR PHILIPS		27324 Blucier Dr. Ventura Ternely 562 Blucier Ave, P.R.	SPENCER.1045@aol.com
DANIEL HONOWITZ		1067 Laguna Mills LA CA 90232	THONOWITZ33@AOL.COM
Patricia Marcia		11755 MARQUEZ Ave	

1017

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

MIRIAM MEYER	<i>Miriam Meyer</i>	357 LAS CASAS AVE	M1MEYER42@gmail.com
Josanna Field	<i>Josanna Field</i>	20147 4th St Apt B Santa Monica 90405	Jdfield@earthlink.net
Carolyn Field	<i>Carolyn Field</i>	269 Quadra Vecchio	FIELD383@gmail.com
Helen Miller	<i>Helen Miller</i>	18123 SANDY CREEK	
Steve Skett	<i>Steve Skett</i>	830 17th St. Santa Monica CA	sjeb3@aol.com
Kristen Haddad	<i>Kristen Haddad</i>	667 Lachman Lane	solhaddad@gmail.com
Meredith Sorensen	<i>Meredith Sorensen</i>	209 Montana Ave.	sorensphotography@yahoo.com
Beverly Reese	<i>Beverly Reese</i>	15914 Maini Way	Reese_beverly@yahoo.com
Karen Linn	<i>Karen Linn</i>	227 Canyon St. P.O.	
Colin Anderson	<i>Colin Anderson</i>	18330 Chestnut Way Malibu Ca 90265	



PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Andrea Gilbert		16767 Mayer 2 Ter	136.641 714 gphw.com
Thana Garcia		16463 Bestor	_____
MILDM TRO		16473 Albright	MTAOXHA.COM
Renea Rodriguez		16463 Bestor	_____
LUCIA SANCHEZ		911 HAWKWOOD AVE	_____
LISA CARMICHAEL		17463 Paulson St PR	www.lisa-carmichael.com
Emile Guevara		724 Greentree rd	Emile.guevara@yahoo.com
X. Koller		725 Tiff Rd.	_____
SEPTINA		600 S. Doright	spring @ hawesil.com
Barbara		889 Taype	barlousch @ virginia.net

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

John Jones	John Jones	275 S LATE AVE #1250 PASADENA CA 91103	john - j. john@gmail.com
W. Based.	W. Based.	8217 Cave Street Ave	Carla DeBenedictis Samuels
Chace Wilson	Chace Wilson	1450 Allenford Ave.	Chacew03@gmail.com
Sam Han	Sam Han	837 alma Real	_____
Connor Acuña	Connor Acuña	17036 Bollinger DR	_____
John D	John D	57a Fratura Dr	_____
DENISE ELLIS	DENISE ELLIS	1137 Espenwade Ave	_____
Andrew Fixner	Andrew Fixner	21 Bartlett Crescent Brookline MA	_____
Quinn Quigley	Quinn Quigley	111 Marques Place	Quinnquigley@gmail.com
Alexis Landau	Alexis Landau	811 Hartwell Street	alex.landau@netmail.com

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Anthony Graeber	Anthony Graeber	1220 El hito	
Ethan Sutter	Ethan Sutter	2215 5th St, Santa Monica	CA 90405
Lavinia Tjagi	Lavinia Tjagi	510 Almor Ave.	lavinia.tjagi@icloud.com
Quinn Conner	Quinn Conner	1515 W Sunset C 103	quinnconner@gmail.com
Leopoldo	Leopoldo	71a Virginia Ynez	llego@sevensouth.org
Marleigh	Marleigh	Topanga Canyon Blvd	Marleigh.Tjagito@icloud.com
Aidan Fiebert	Aidan Fiebert	16040 Sunset Blvd.	aidan.fiebert@yoh.com
Charlie	Charlie	21254 Colina Dr., Topanga	charlie@pchs.fallhigh.org
Fiona Nicks	Fiona Nicks	810 Bramble way	Fiona.nicks@yoh.com
Grant Frickling	Grant Frickling	3221 Carter Ave	7chapman0407@yahoo.com

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Kathia Burke		8111 Gallows Way St	kburke997@aigmail.com
Caroly Schwartz		1141 Gallows St.	Carolschwartz@yahoo.com
Robyn Barker		1521 Weddington St.	Kdc67@hotmail.com
Fuentes Madella		6549 Michael Ave.	
Emily Pernell		777 South Bristol	erowmalt@comcast.net
Geoff Meyer		1525 Kew St.	grmeyer1414@yahoo.com
MICHAEL MARQUEZ		2196 GARMUDA ST. #201 L.B. CA. 90814	N/A
Jesse Mubilly			
Caroleo B. Frangou		2260 main st Santa Monica	elbd111@hotmail.com
Samuel Hanks		665 Via Dela lag #12	hanks.samuel@pol.com

WC12

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Elena Solter		307 Cathlamet Ave.	elenasolter@gmail.com
Erin Fleming		3205 Los Feliz Blvd. #11-12	gronkerin@gmail.com
Christina Kuschewski		108 Sugarloaf	jeffreydewright
Patricia Jones		10577 Via Floresta Pacific Palisades 90272	TMA@hotmail.com
Esther		1384 Larchman Lane PP 90272	smartelijones@gmail.com
Denny Strickland		22704 W 5th St PP 44	shane@padco.ca
Lester Perez		8331 Belvue St. PP	getty@aol.com
Dorinda Katz		110820 Edgemoor St	resipe rez@pages.com
Josita Martinez		1027 16th St. Santa Monica	
		364 Arroyo Viejo Pacific Palisades	mm44@yahoo.com

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Alissa Wood	Alissa Wood	608 Radditte Ave.	AlissaWood@aol.com
Kristin Lamons	Kristin Lamons	378 N. Skyway Rd	KristinLamons@yahoo.com
Denise Sklar	Denise Sklar	3900 Carpenter St	—
Annette Sumner	Annette Sumner	3900 Carpenter St.	annette@degeanero.com
Ann Blackley	Ann Blackley	England Yorkshire	—
Valeria Szalad	Valeria Szalad	Alcotford Ave	Val@attmail.com
Marc Szalad	Marc Szalad	918 19th St. San Ca. 90403	marcszalad@yahoo.com
Charlyn Inker	Charlyn Inker	2602 Calle Abadl Thousand Oaks	2145110@gmail.com
Andy Fay	Andy Fay	545 Ervine Way Pacific	—
Dimitra Clarke	Dimitra Clarke	897 W. Main Blvd. Fullerton	DimitraJClarke@aol.com

hero

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to
a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.







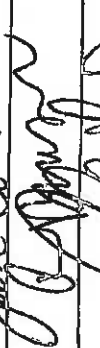



Marta Roberts	Marta Roberts	708 Foxenford Ave. P.P.	Marta.Roberts@ycplds.com
Anna Acosta	Anna Acosta	Cambridge. P.P.	
Eleanor Taylor	Eleanor Taylor	Agnew Blvd 495666	
Pam Hanco	Pam Hanco	751 Chantawana Blvd	
Jay McClary	Jay McClary	931 Iff St.	
Wmng Senger	Wmng Senger	810 Iff St. R.R.	
Tara Sizlo	Tara Sizlo	1269 Chantawana Blvd.	Tara.sizlo@aol.com
Dylan Knight	Dylan Knight	Pacific Palisades	
Scott Sander	Scott Sander	1509 Chantawana Blvd	Scott.Sander@gmail.com
Jay Stet	Jay Stet	15777 Bowdoin Ave.	Kelly.Hunter@ycplds.com

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Nelly Parmelee		873 Via de la Paz	He.Ramead.com
Vikram 807		875 Via de la Paz	
Sullivan Sandoval		881 Via de la Paz	BulSe.hofstetl.com
Claire Buchanan		874 Via de la Paz	Claire 147@attolpacific.com
Adrian Johnson		872 Via de la Paz	Maritz77@gmail.com
Guy Heron		1682 W Sunset	Maratony@yahoo.com
Jan Costain		Georgetown, ON	
B. Buchanan		722 Via de la Paz	
Carmen Weers		860 Via de la Paz	herdigcable@gmail.com
Chuck Black		17759 Calle Refe	

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Moses Buryan	<i>[Signature]</i>	7240 West Knolls	Moshe bar zee <i>[Signature]</i>
Margot Saxer	<i>[Signature]</i>	1444 Kachman R.	—
Marcela Hertz	<i>[Signature]</i>	756 Via de La Paz	—
Maria Potos	<i>[Signature]</i>	531 Palisades Dr.	erik-park@hotmail.com
Nita Chopra	<i>[Signature]</i>	833 Via de La Paz	nchoprazum@gmail.com
Subreena A.	<i>[Signature]</i>	853 Via de la Paz	—
Rubi Cruz	<i>[Signature]</i>	857 Via de La Paz	rubicruz98@gmail.com
David Tishbi	<i>[Signature]</i>	859 Via de La Paz	dtishbi@yahoo.com
Blanca Blazquez	<i>[Signature]</i>	861 VIA DE LA PAZ	41C LILLETJEN@AOL.COM
Fidra Navaro	<i>[Signature]</i>	865 Via De La Paz	navarv1991@icloud.com











PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.











Laith Aggar		956 Granville Ave, LA	Laithagga@gmail.com
Paul Hayward		15301 Antech Jr	Pchtrami1@gmail
Pali HiTech		970 Monument st.	info@palisadeslith
SasameExpress		970 Monument st	skrep182@yahoo.com
Emily Miner		1214 Chautauque Blvd	eminer@gmail.com
Jessica Miner		1214 Chautauque Blvd.	minerjod@gmail.com
Paris Peal		15239 W. sunset blvd	ParisPeal@aol.com
emio alexander		420 wyndola st	emioalexander.en@pchs.palmsprings.org
Wowie hambright		16270 W. Sunset Blvd.	smarzer17@icloud.com
Jite Agege		6587 Kentwood Bluffs Dr.	jiteagege@gmail.com

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

- a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Carter De		1916 Cohen Ave #401 LCA	CarterDe@gmail.com
Suzanne D. DeWitt		4354 Santa Monica Blvd #204	SuzanneDeWitt@aol.com
M. Meadows		863 Swathmore	ismvst@comcast.net
Brooke F		11625 Montana Ave	brookfedent@gmail.com
Leslie W.		15310 Antioch Street	leslie.wadsworth@gmail.com
Hannah Leppner		15310 Antioch St	hannah@q.ww.edu
Jose Almaraz		15322 Antioch	Palibacberg@yahoo.com
K. Dull		15322 Antioch	Pat Pal
E. Dorset		Pali Elementary	eskhagen@gmail.com
Donsi Marc		Pali Elementary	DORSI.MARC@GMAIL.COM


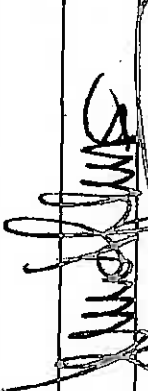

LES

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

- Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.
- Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Carol Davis	Kevin	Galloway, S. P.P.	
Maria Farias	Maria Farias	De. Davis	MFarias@aol.com
Elaine Kahn		1124 Sunset Blvd.	Via E@hototail.com
STEVE CARROLL	Steve Carroll	1029 VIA DE LA PAZ	SUNH100 @ VERIZON.NET
Heena		15200 Sunset Blvd.	
Jimmie Flores		15224 W Sunset Blvd	
Simone Madison		15244 Sunset BL	
Thomas Collins	Thom Cox	15244 Sunset BL	thomswayne.collins@gmail.com
Ashra Isacov	Ashra Isacov	15260 Antioch St	
Frank Wessner	Frank Wessner	18424 Coastline Dr	


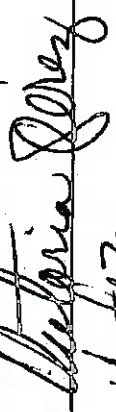








PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Cyus Sennesi		16000 W. Sunset Blvd Unit 302	Csennesi@gsn.net
Victoria Perez		1117 - Chataqua	
Marta Zamorano		379 W Chanel Rd. SM	martta72@live.com
Jasmine Mendez		6115 Whitsett Ave 213	
Feresca Red Teresa Riera		Moorepark St Sherman Oaks CA 91403	
EDESSA KEHRLIN		BESTOR BLD. PACIFIC PALISADES	EDESSA KEHRLIN @EMAIL.COM
Ethos Bello		527 Lombard Av. Pacific Palisades	
E. Brown		15107 Palisade	
Alexandria Lloyd		221 Sunset Blvd.	9117thompson12@yahoo.
JESSICA WINN		15314 ELLHAM	jessie.sands@gmail.

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Lauren Vermien		(536 Old Oak Road 4049	laurenvermien@aol.com
Lauren Davidi		221 Smita Ave 90019	davidilauren@gmail.com
Sarah P. Vignola		1576 Palisades Dr	
Lois Decayreen		17250 W. Sunset Blvd PP	LoisB@gmail.com
Hilana Ruiz		1065 Villa Grove P.P.	171710@hotmail.com
Robert B. B.		152 LA GLEN DR.	rockeaslen
Carolina Ora		3640 Orange Ave CA	
Matthew		1325 75th St. P.O.	
Amy Garcia		embury st. pacific	amelizagarcia@gmail.com
Hiedi Blane		via de la Paz P. Palisades	

led

PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Ashley Kautman	Alca	1528 Los Angeles Ave	Sunnyvale CA 94085	ashkay748@gmail.com
Brenda Servin	Beryl	1009 E 76th St	LA CA 90001	navisela.diaz89@gmail.com
Aaron Taret	Aaron Taret	15340 Alhambra St	90040	stan-janet@gmail.com
Gordon S	Gordon S	361 Alhambra		Stan-janet@gmail.com
Maria Bleyberg	Maryberg	18406 Kingsport	Malibu 90265	Stan-janet@gmail.com
Boy Thelend	Thelend	2587 Amherst Ave		Playford1501@gmail.com
Stella Donati	Donati	2447 arbutus Dr.		pinkprincess@gmail.com
Enica Felder	Enica Felder	308 N. Rossmore ave.		erickfelden16@gmail.com
Sharon Hines	Sharon Hines	841 Chautauque Blvd		skya.jean.hines@gmail.com
Sharon Hines	Sharon Hines	881 Alhambra		SharonHines@gmail.com










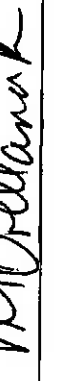
PETITION TO Protect Sunset Boulevard's Scenic Highway!

The Los Angeles Department of Water & Power has erected a hulking 61' tall industrial blight near the intersection of Sunset & Marquez in the heart of the Pacific Palisades. LADWP began the process of installing this pole top distribution station without the required Coastal Approvals. They have been halted by the Coastal Commission and are now seeking the necessary Coastal Development Permit to proceed with construction.

We, the undersigned, are concerned citizens who urge our leaders to act now to

a) Urge LADWP to install a more aesthetically pleasing alternative to their 61' tall Pole-Top Distribution Station; A 7' tall Pad-Mounted System.

b) Firmly oppose the issuance of a Coastal Development Permit to proceed with construction.

Jane Brennan		COV - 07 - 51078	jill.brennan@jpbw.com
Violet Beckar		14348 Spaulding Way	violet@abv.ca
Margaret Tilman		855 Haverland Ave	1877ma@gmail.com
Joannara Lima		1314 Chautauque	lima.joannara@gmail.com
Graciela Pizarro		16646 Linde Laan	gracie@hobmail.com
Maria Gutierrez		12-16 S Lantana	lupa.yaya.com
Juana Speck		16730 Calle Brillang	julia.spick@yahoo.com
Clark Freeman		14611 Dunwood St.	clark.freeman@yahoo.com
Andi Owens		17321 Avenida de la Herencia	andiod25@gmail.com
Veronica Ruvo		1001 Embery St	

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1299 Ocean Ave., Suite 450, Santa Monica, CA 90401.

On April 12, 2017, I served the foregoing document described as, **APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT** by placing true and correct copies thereof to the following parties:

SEE ATTACHED SERVICE LIST

(X) **By FIRST CLASS MAIL POSTAGE PREPAID AS FOLLOWS:** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date, following ordinary business practices, in the United States mail at Santa Monica, California.

() I caused such envelope(s) to be deposited in the mail at Santa Monica, California.

() **BY OVERNIGHT MAIL:** I placed a true copy of said document in a sealed **FEDERAL EXPRESS PACKAGE** addressed as indicated above, with delivery fees provided for, and, deposited said envelope in a box regularly maintained by **FEDERAL EXPRESS**, for next day delivery.

() **BY ELECTRONIC SERVICE:** Based on a court order, I transmitted the document to the following persons through File & Serve Xpress (<http://www.fileandserveexpress.com>). I did not receive within a reasonable time after the transmission any electronic message or other indication that the transmission was unsuccessful.


() **BY FACSIMILE TRANSMISSION:** I caused such documents to be personally delivered to the parties at the facsimile numbers listed above.

() **BY PERSONAL SERVICE:** I caused such documents to be personally delivered to the parties at the address listed below:

() **BY EMAIL:** I caused such documents to be personally delivered to the parties at the email address listed above.

(X) Executed on April 12, 2017, at Santa Monica, California.

(X) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Tisarai S. Johnson

SERVICE LIST

1
2 Tina Shim, Esq.

3 Deputy City Attorney, City of Los Angeles
4 Los Angeles Department of Water & Power
5 111 N. Hope Street
6 Los Angeles, California 90012

7 City of Los Angeles Department of Public Works, BOE EMG
8 Attention: Catalina Hernandez, Environmental Supervisor
9 1149 S. Broadway, Suite 600, Mail Stop 939
10 Los Angeles, California 90015-2213

11 William Herriott, Power System Superintendent
12 Los Angeles Department of Water and Power
13 111 North Hope Street, Room # 856
14 Los Angeles, California 90012

15 Chu Family Living Trust
16 16991 Sunset Blvd.,
17 Pacific Palisades, California 90272

18 Richard C. Wahlgren
19 16975 Sunset Blvd.,
20 Pacific Palisades, California 90272

21 David Noriani
22 16969 Sunset Blvd.,
23 Pacific Palisades, California 90272

24 Palisades Bay Club
25 c/o KENT BURTON, ESQ.
26 BAKER, BURTON & LUNDY, P.C.
27 515 Pier Avenue
28 Hermosa Beach, California 90254-3889

Walt Griesser
c/o KENT BURTON, ESQ.
BAKER, BURTON & LUNDY, P.C.
515 Pier Avenue
Hermosa Beach, California 90254-3889

Pacific Palisades Residence Association
PO Box 617,
Pacific Palisades, California 90272