

**CALIFORNIA COASTAL COMMISSION**

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**Th11a**

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 Staff: D. Ziff-LB  
 Staff Report: 05/17/2018  
 Hearing Date: 06/07/2018

**STAFF REPORT: REVISED FINDINGS FOR DE NOVO**

**Application Number:** A-5-PVE-17-0069

**Applicant:** Jeff & Roberta Coppersmith and Rainville Design Studio

**Agents:** Stanley Lamport and Monica Briseno

**Project Location:** 2801 Via Segovia, Palos Verdes Estates, Los Angeles County (APNs: 7542031006, 7542031004).

**Project Description:** Installation of a 6.5-foot high wrought iron fence and hedge landscaping on a bluff top lot developed with a single-family residence.

**Commissioners on Prevailing Side:** Howell, Lueveno, Peskin, Uranga, Vargas, Aminzadeh

**Staff Recommendation:** Adopt the revised findings.

**SUMMARY OF COMMISSION ACTION**

On November 28, 2017, the City approved Local Coastal Development Permit Application No. 107-17 with conditions for the installation of a 6.5-foot high wrought iron fence and landscape hedge at a single-family residence along the north-facing property line and a portion of the 20-foot setback line from the north-east facing property line. On December 12, 2017, Sue and Scott Kidman, residents at 2808 Paseo Del Mar, filed an appeal of the Local CDP contending that the project was inconsistent with the certified LCP because the development would obstruct public views of the coastline and ocean from Paseo Del Mar and the adjacent public parklands; because the proposed fence and hedge were not located on the least visible part of the property; and because the City improperly waived the requirement for submittal of a geologic report in conjunction with the Coastal Development Permit (CDP) application.

The subject site is adjacent to public parkland and other single family residences and is located between the first public road and the sea and within 300 feet of the beach on a coastal bluff top above Honeymoon Cove on the Palos Verdes Peninsula. Coastal Commission staff visited the subject site and determined that the City-approved fencing and landscaping would restrict scenic coastal views from the public road and the public park and would, therefore, be inconsistent with the visual resource policies of the certified LCP. In addition, the City waived the LCP requirement for a geologic report and failed to make findings through its CDP approval of a structure within 50 feet of a bluff edge that the proposed fence could be supported by the bluff and would not increase any existing geologic hazards.

In its action on April 12, 2018, the Commission determined that a substantial issue exists with respect to the grounds on which the appeal has been filed because the project, as approved by the City of Palos Verdes Estates, was not consistent with the policies and standards set forth in the City's certified Local Coastal Program (LCP).

Following discussions with the applicant, staff recommended that the Commission approve Coastal Development Permit No. A-5-PVE-17-0069 subject to special conditions requiring the applicant to: **1)** locate the 6.5-foot high wrought-iron fence along the north-facing property line and a portion of the northeast-facing twenty foot setback line with a design that minimizes view impacts and geologic instability; **2)** use all noninvasive, low water use landscaping which shall have the potential to grow no more than two feet and six inches tall north and seaward of the residential structure to minimize encroachment into blue water views; and **3)** submit a geologic report to the Executive Director to ensure that the proposed fence can be supported by the bluff and will not increase any existing geologic hazards.

In its action on April 12, 2018, the Commission also conducted a de novo review of the project. Prior to the vote to approve or deny the coastal development permit, the Commission voted to approve an amending motion to condition the permit to lower the fence height to five feet. Subsequently, the Commission voted on the motion to approve the coastal development permit. This motion failed to gain a majority vote (6-6 tie), and it therefore failed. Thus, the Commission denied CDP Application No. A-5-PVE-17-0069. The Commission found that the proposed fence could not be found to be consistent with the policies of the certified LCP that protect public views.

Staff is recommending that the Commission adopt the following revised findings in support of the Commission's action on April 12, 2018 to deny Coastal Development Permit A-5-PVE-17-0069. The Commission's action differed from the staff recommendation only on the de novo portion of the staff report dated March 29, 2018, but not the substantial issue portion. Therefore, revised findings have been prepared only on the de novo portion.

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## I. MOTION AND RESOLUTION – REVISED FINDINGS

### Motion:

*I move that the Commission adopt the revised findings proposed by staff in support of the Commission's action on April 12, 2018 to approve Coastal Development Permit No. A-5-PVE-17-0069.*

Staff recommends a YES vote. Passage of the motion will result in the adoption of revised findings as set forth in this staff report. The motion requires a majority vote of the members from the prevailing side present at the April 12, 2018 hearing, with at least three of the prevailing members voting. Only those Commissioners on the prevailing side of the Commission's action are eligible to vote on the revised findings.

The Commissioners on the prevailing side are: **Howell, Lueveno, Peskin, Uranga, Vargas, and Aminzadeh.**

### Resolution:

*The Commission hereby denies a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development will not conform with the policies of Chapter 3 of the Coastal Act and will prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit would not comply with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives could be incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are ~~no~~ further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.*

## II. SPECIAL CONDITIONS

Coastal Development Permit Application No. A-5-PVE-17-0069 was denied as a result of the failure of the motion to approve the permit to receive a majority of Commissioner votes in favor of it; thus, the recommended special conditions were not approved.

## III. FINDINGS AND DECLARATIONS

### A. PROJECT LOCATION & DESCRIPTION

The site is located on top of a coastal bluff above Honeymoon Cove between the first public road and the sea, on the corner of Via Segovia and Paseo Del Mar in the City of Palos Verdes Estates (~~Exhibit 1~~ Appendix A2). Paseo Del Mar, the first public road paralleling the sea, is a scenic coastal road which provides coastal access parking and is popular with walkers and joggers. The approximately 22,405 sq. ft. subject lot, developed with a one-story single-family residence, abuts the bluff edge to the west and public parkland to the north. The public park contains a bluff top trail, coastal views, and a beach access trail. As the first structure to the south of the park, the subject site is visible from the public parkland and Paseo Del Mar. The subject site and parcels to the south are designated single family residential (R-1) per the City's certified LCP and developed with single-family homes featuring large front, side, and rear yards.

**The City of Palos Verdes Estates’ adopted Resolution No. PCR-2017-1038, which approved Local Coastal Development Permit No. CDP 107-17, the subject of the appeal, which allows, per the applicant’s request, the installation of a 6.5-foot high wrought iron fence and immediately adjacent 6.5-foot high hedge at the subject site in the side and rear yard areas abutting the parkland and paralleling Paseo Del Mar. On December 12, 2017, Sue and Scott Kidman, residents at 2808 Paseo Del Mar, filed an appeal of the Local CDP contending that the project was inconsistent with the certified LCP because the development would obstruct public views of the coastline and ocean from Paseo Del Mar and the adjacent public parklands; because the proposed fence and hedge were not located on the least visible part of the property; and because the City improperly waived the requirement for submittal of a geologic report in conjunction with the Coastal Development Permit (CDP) application.**

**A**The substantial issue recommendation was scheduled to go in front of the Commission at the March 2018 meeting; however, due to insufficient noticing, the substantial issue vote was postponed. Before the postponement, staff received nine written comments and one commissioner submitted an ex-parte communication disclosure (~~Exhibit 7~~**Appendix A1**). **Prior to the April 2018 meeting, the Commission received additional letters from the appellants, the applicants’ representatives, and two members of the public and an ex-parte communication disclosure (Appendix A4).**

~~If the~~ **In its action on April 12, 2018, the Commission found** finds that a substantial issue exists with respect to the conformity of the action of the local government with the **policies of the certified LCP** Chapter 3 policies of the Coastal Act. **Thus,** the local coastal development permit ~~was~~ is voided and the Commission ~~was able to~~ may consider alternative project designs or mitigation measures in its de novo review.

**In its action on April 12, 2018, the Commission also conducted a de novo review of the project. Prior to the vote to approve or deny the coastal development permit, the Commission voted to approve an amending motion to condition the permit to lower the fence height to five feet. Subsequently, the Commission voted on the motion to approve the coastal development permit. This motion failed to gain a majority vote (6-6 tie), and it therefore failed. Thus, the Commission denied CDP Application No. A-5-PVE-17-0069. The Commission found that the proposed fence could not be found to be consistent with the policies of the certified LCP that protect public views.**

## **B. PUBLIC ACCESS & RECREATION**

As a de novo matter, the standard of review for the proposed development is the City of Palos Verdes Estates certified LCP. Since the proposed project is located between the first public road and the sea, Coastal Act Section 30604(c) applies and any development approved by the Commission must also conform with the public access and recreation policies of Chapter 3 of the Coastal Act.

As provided below, the City of Palos Verdes Estates’ certified LCP contains policies that protect natural resources and require provision of public access within the coastal zone. These policies emphasize the preservation of coastal views as presented below. Additionally, Chapter 3 of the Coastal Act includes policies requiring that maximum public access be provided.

**Relevant LCP Policies**

Land Use Plan – Objectives and Goals, Community Appearance:

*To emphasize the natural beauty of the hills, canyons, and seashore and diminish the impact of man-made things on the natural landscape*

Land Use Plan – Land Use Element:

*To quote from a summary of the Protective Restrictions: ‘The restrictions have been most carefully worked out for every part of Palos Verdes Estates, to accomplish the following results:*

*First: To preserve the fine views of ocean, mountains and park...’*

*The above quote more than anything else, sums up the objectives and development goals of the community to the present and into the future.*

Land Use Plan – Conservation Element, Standards:

*Development of private property along the bluffs requires geologic studies, positive drainage control and landscaping plans which will prevent deterioration of the adjacent parkland.*

Land Use Plan – Housing Element, Environmental Considerations:

*Probably the greatest benefit that the City of Palos Verdes Estates can provide in the Regional Plan is to make available the beautiful scenery and unrestricted views available to the entire region.*

Land Use Plan – Scenic Highways Element, Highway Beautification:

*Palos Verdes Estates has committed itself to maintaining the existing scenic corridors on all of its streets.*

Land Use Plan – Scenic Highways Element, Shoreline Preserve:

*This [Shoreline] preserve has thereby created a very pleasing area and the view of this area from the surrounding streets is a definite asset.*

Land Use Plan – Implementation of [Scenic Highways] Element, General Comments:

*The City of Palos Verdes Estates has, since its inception, maintained the highest degree of scenic corridors on all of its streets, parkways, and parklands. The Homes Association in turn has maintained the same degree of control on development of private property throughout the City. This policy of development and maintenance will undoubtedly be continued in the years to come.*

*The generally hilly terrain of the area does not lend itself to extensive widening of scenic corridors without adverse effects on private properties, parkways and parklands.*

Land Use Plan – Safety Element, Geologic Hazards:

*All of the bluff areas are subject to this hazard [ocean bluff erosion and rock falls] and therefore prior to development in this area detailed geologic studies are required.*

Land Use Plan – Shoreline Preserve Master Plan, Recreation Recommendation 2:

*Designate and Improve View Sites and Associated Parking – View sites permit viewing of scenic values of the tidelands. Such viewing of tidelands is a purpose in which there is local and statewide interest...*

Implementation Plan – Section 18.04.160 (also Section 18.16.050 and part of 19.02.020, Permitted use), Coastal zone limitations on development in bluffs:

*Structures, additions to structures, grading, stairways, pools, tennis courts, spa, and/or solid fences may be constructed on private property on, or within fifty feet of, the bluff edge only after preparation of a geologic report and findings by the city that the proposed structure, addition, grading, stairway, pool, tennis court, spa, and/or solid fence:*

*A. Poses no threat to the health, safety, and general welfare of persons in the area by reason of identified geologic conditions which cannot be mitigated; and*

*B. The proposed structure, addition, grading, stairway, pool, tennis court, spa, and/or solid fence will minimize alteration of natural landforms and shall not be visually intrusive from public viewpoints in the coastal zone. Permitted development shall not be considered visually intrusive if it incorporates the following to the maximum extent feasible:*

- 1. The development is sited on the least visible portion of the site as seen from public view points;*
- 2. The development conforms to the scale of surrounding development;*
- 3. The development incorporates landscaping to soften and screen structures; and*
- 4. The development incorporates materials, colors, and/or designs which are more compatible with natural surroundings.*

Implementation Plan – Section 18.36.010, Purpose and intent:

*The purpose of this chapter is to preserve the natural scenic character of the city by establishing minimum standards related to the siting and massing of either a new structure or a remodeled structure in an existing neighborhood to assure to the greatest extent practicable that the resulting structures are compatible with the neighborhood within which they are located. The intent of this chapter is to regulate the development or redevelopment of each building site with respect to adjacent land, public or private, and existing structures so as to maximize visually pleasant relationships, assure a bright, open neighborhood with a maximum of light and air, and avoid the unpleasant appearance of crowding one structure against another, or of one structure towering over another, insofar as is reasonable and practical. It is not the intent to unreasonably restrict or regulate the right of an individual property owner to determine the type of structure or addition he may wish to place or modify on his property. The applicant has the obligation to take into consideration the impacts of the affected property owners when modifying the structure or proposing a new structure and take reasonable steps to mitigate such impacts...*

Implementation Plan – Section 19.01.145, Public view point:

*“Public view point” means any publicly owned beach, park, bluff area or other location in the coastal zone to which the public has access and from which it can view development in the coastal zone.*

Implementation Plan – Section 19.02.030, Applicant for a coastal development permit:

*...Each application shall include the following information...*

*C. Engineering and geology reports which consider, describe, and analyze the following...*

*E. If the city so requires, in the city’s sole discretion, a waiver of and a hold harmless from the applicant, including both the developer and the property owner and their successors and assigns, for any and all claims against the city, the county, the state and other public agencies involved in the development, for future liability or damage resulting from the CDP and the development when completed. All such waivers and hold harmless clauses shall be recorded with the office of the county recorder for the county of Los Angeles;*

*F. Other information and requirements as the director of planning and the city engineer, in their sole discretion, may deem necessary to processing the application.*

Implementation Plan – Section 19.02.040, Findings for approval:

*A. A coastal development permit shall be approved by the issuing body only upon affirmative findings that:*

- 1. The plans for the proposed development and the coastal development permit comply with all of the requirements of this chapter and other relevant city ordinances and development standards; and*
- 2. The proposed use is consistent with the certified local coastal program, the general plan, any applicable specific plan, and the applicable zoning ordinance or ordinances; and*
- 3. The proposed use will not be visually intrusive from public view points; and*
- 4. The required reports and plans demonstrate to the satisfaction of the city, in its sole discretion, that the proposed use can be supported by the bluff and the proponent has demonstrated that the proposed use will not increase any existing geologic hazards; and*
- 5. The proposed development, when located between the sea and the first public road inland from the sea, is in conformance with the public access and recreation policies of the California Coastal Act as contained in Chapter 3, Cal. Pub. Res. Code §§ 30200 through 30224, the applicable sections of the California Code of Regulations, and the local coastal program.*

*B. Approval may be recommended and/or granted upon conditions that are necessary and reasonable to ensure that the proposed use will be designed,*



*located, developed and maintained in accordance with the findings required by this section, the local coastal program, the general plan, any applicable specific plan, and the applicable zoning ordinance or ordinances.*

The City's Zoning Code provides specific height and setback requirements for fences in scenic areas. Section 18.32.010, R-1 and R-M for walls, fences and accessory structures has been modified by the City since the Commission certified the Implementation Plan in 1991 and minor IP amendment in 1996. Thus the specific heights and setback requirements are not the standard of review but can be used as guidance.

The section certified by the Commission in 1991 states:

*No fence or wall in the R-1 or R-M zones shall exceed a height of six feet six inches measured from adjacent natural or existing elevation unless a special permit for such wall or fence is applied for and received.*

As modified by the City, Section 18.32.010, R-1 and R-M walls, fences and accessory structures provides:

- A. *Maximum Height. No fence, wall or accessory structure in the R-1 or R-M zone shall exceed the following heights:*
  1. *Any fence, wall or accessory structure in the minimum required setback adjacent to a public street shall not exceed three feet, six inches in height. However, if a fence, wall, or accessory structure is located on a downhill slope from the street it shall not exceed three feet, six inches in height on the side facing the street and not exceed six feet, six inches in height on the downhill side of a slope. Setbacks from an alley adjacent to the rear or side of a lot are not included in this requirement.*
  2. *All other fences, walls or accessory structures shall not exceed six feet, six inches in height.*

### **Relevant Coastal Act Policies**

Because the proposed development is between the first public road and the sea, the public access policies of the Coastal Act are also the standard of review.

Section 30210 of the Coastal Act states, in part:

*...maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, and rights of private property owners, and natural resource areas from overuse.*

Section 30211 of the Coastal Act states, in part:

*Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization...*

The proposed fencing is on private property and would not impact public access to the coast or beach or recreational opportunities along the coast.

### **C. VISUAL IMPACTS**

The City of Palos Verdes Estates' certified LCP mentions several times the importance of protecting ocean and coastal views throughout the coastal zone. For example, the land use element of the certified LUP states that the development goals of the LCP are “[f]irst: to preserve the fine views of the ocean.” In addition, the scenic highways element of the LUP states that “Palos Verdes Estates has committed itself to maintaining the existing scenic corridors on all of its streets.” In fact, a coastal development permit can only be approved upon finding that “the proposed use will not be visually intrusive from public view points” (IP section 19.02.040).

**The project proposed by the applicants included a 6.5-foot high fence and hedge that would restrict public views of the ocean along Paseo Del Mar and from within the public parkland. Coastal Commission staff met with the applicants to discuss changing the project to minimize adverse impacts to scenic coastal resources. The applicants mentioned wanting tall landscaping for added privacy, but they also agreed that limiting the height of the landscaping to a maximum growth potential of 2.5 feet would lessen view impacts. No landscaping for the de novo project was proposed in writing. Any new planting, including on the existing deck and within the planter boxes which currently obstruct blue water views, must protect views of the ocean from public view points.**

**Alternatives for fence heights below the maximum allowable height of 6.5 feet were considered; however, the applicants were concerned that a shorter fence would pose a security threat and not suffice as a deterrent to individuals wishing to trespass onto the property. Security measures, other than a 6.5-foot tall fence, could be implemented to protect the residence. In addition, Palos Verdes Estates has crime rates far below state and national averages and there are no policies in the certified LCP that require the protection of private properties from such threats. The proposed 6.5-foot high wrought iron fence would intrude into the public viewshed inconsistent with sections 18.04.160 and 19.02.040 of the City's certified Implementation Plan (IP).**

**Under section 18.04.160 of the City's certified IP, development is considered visually intrusive if, to the maximum extent feasible, it (1) is not sited on the least visible portion of the site as seen from public view points, (2) does not conform with the surrounding scale of development, (3) does not incorporate landscaping to soften and screen structures, and (4) does not incorporate materials, colors, and/or designs which are more compatible with natural surroundings. In this case, the wrought-iron fence at 6.5 feet in height could be designed to be more compatible with the natural surroundings and could be sited on a less visible portion of the site.**

**As proposed, the 6.5-foot wrought-iron fence and hedge would be visually intrusive and would adversely impact public views of the ocean and coast inconsistent with the policies of the certified LCP.**

The original project, as approved by the City, included a 6.5-foot high hedge that would have restricted public views of the ocean. The de novo project, however, as conditioned, will minimize impacts to ocean and coastal views from public view points by restricting the landscaping to a maximum height of two feet and six inches while not unreasonably restricting the rights of the private property owners. Alternatives for fence heights below the maximum allowable height of 6.5 feet were considered; however, given the applicants' security concerns and the topography of the site and neighboring parkland, the 6.5-foot high fence was determined to be necessary to protect the property. While the proposed 6.5-foot wrought-iron fence intrudes into the public viewshed, it would not be a solid barrier to public views.

Alternative locations for the fence were also considered; however, section 18.36.010 of the City's certified Implementation Plan states that the intent of the policies of the LCP is not to unreasonably restrict private property rights. Construction of a fence within the property line would restrict the homeowners' use of the full property. Therefore, **Special Condition 1** requires final fence plans to be submitted to the Executive Director for review and approval identifying the location of the wrought-iron fence along the northeast 20-foot setback line and north property line and a fence design no taller than 6.5 feet with no greater than two-inch square posts and 5/8-inch square pickets spaced a minimum of four inches apart and shall not include designs that significantly extend into the open space between pickets. The City had approved the wrought-iron fence with 2 square inch posts placed 6 feet apart and 0.5 square inch pickets placed 6 inches apart; however, the applicants indicated they wanted to use an alternative design. The applicants did not submit plans showing the proposed fence design or the footings that attach the structure to the bluff top. Therefore, these details must also be reviewed and approved by the Executive Director, as required by **Special Condition 1**. Considering approximately half of the structure is within fifty feet of the bluff edge, the revised plans showing the footing elements shall be reviewed by a licensed geotechnical expert prior to submittal to the Executive Director to ensure that the proposed fence can be supported by the bluff and will not increase any existing geologic hazards as required per the City's certified LCP. As conditioned, the fence will be visually permeable, will not significantly impact coastal views, and will be consistent with the policies of the certified LCP.

Staff had a meeting with the applicants and representatives to discuss the de novo project during which the applicants mentioned wanting tall landscaping for privacy; however, no landscaping for the de novo project has been proposed in writing. To ensure that the proposed project remains compatible with the scenic resources of the area, **Special Condition 2** requires all new landscaping north and seaward of the residential structure, as shown in **Exhibit 8**, to have a maximum growth potential of two feet and six inches from the ground elevation. Given the topography of the site and the adjacent parkland, limiting the height of the landscaping would minimize the potential for encroachment into blue water views as seen from locations within the parkland and from Paseo Del Mar. For the purpose of this condition, the existing deck is not considered part of the residential structure because the existing deck and planter boxes obstruct blue water views. In addition, given that the existing deck and residence are within fifty feet of the bluff edge, pursuant to section 13250(b)(1) of the Commission's regulations (incorporated via section 19.01.080[A]), any future improvements to the landscaping would not be exempt from Coastal Development Permit requirements. Therefore, as conditioned, no new planting on the deck would be allowed without a CDP from the City. Any such planting must be protective of blue water views. **Special Condition 2** also requires any landscaping to be non-invasive and

~~drought tolerant minimizing water use and potential adverse impacts on native vegetation in the area. In addition, drip or microspray irrigation systems are encouraged through **Special Condition 2** to minimize erosion.~~

~~The proposed fence (largely within 50 feet of the bluff edge) is not below six feet tall and is, therefore, considered a structure under the definition in the certified LCP and, pursuant to IP section 18.04.060, requires a geologic report. Thus, **Special Condition 3** is imposed which requires an appropriate geologic professional to evaluate the proposed fence and submit a geologic report to the Executive Director prior to issuance of the permit which demonstrates that the proposed fence can be supported by the bluff and will not increase any existing geologic hazards.~~

~~As conditioned, the proposed development would not be visually intrusive and would protect views of the ocean and coast consistent with the certified LCP.~~

#### **D. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Section 13096 of the California Code of Regulations requires Commission approval of a coastal development permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The Palos Verdes Estates Planning Department is the lead agency for the purposes of CEQA review. On November 28, 2017, the City determined that the project is categorically exempt from CEQA review under Section 15301 (Class 1, Existing Facilities).

~~The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, in the form of special conditions, require the applicant to install a visually permeable fence with a design and landscaping that does not significantly impact coastal views from public view points at the north property line and a portion of the twenty-foot setback line from the northeast property line.~~

As **proposed** conditioned, there are ~~no~~ feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is **not** the least environmentally damaging feasible alternative and **does not** comply with the applicable requirements of the Coastal Act to conform to CEQA.

#### **Appendix A – Substantive File Documents**

1. The City of Palos Verdes Estates' Local Coastal Program
2. [Coastal Commission staff report dated March 29, 2018](#) and [related exhibits](#) (Item Th14a)
3. [Addendum to Item Th14a dated April 10, 2018 and related attachments](#)
4. [Ex Parte communication](#) and [Correspondence for Item Th14a](#)