



December 13, 2021

California Coastal Commission
South Coast District Office
301 East Ocean Boulevard, Suite 300
Long Beach, CA 90802

Via Email

SUBJECT: Rancho Palos Verdes Appeal Numbers A-5-RPV-21-0076 and A-5-RPV-21-0077

Dear Honorable Commissioners:

The City of Rancho Palos Verdes (hereinafter "City") supports the installation of security cameras near the Lunada Pointe HOA (W14D, Appeal No. A-5-RPV-21-0076) and West Portuguese Bend Community Association (W14E, Appeal No. A-5-RPV-21-0077), as conditioned in the City-approved Coastal Permits (Case Nos. PLCP2021-0002 and PLCP2021-0003).

In issuing the permit at the local level, the City found that the proposed development is consistent with the adopted Local Coastal Plan. Specifically, there will be no adverse impact to coastal resources nor scenic views along the view corridors as the camera systems consist of a slender pole; similar to street signs on poles located throughout the City's public right-of-way. The City additionally found that the development is consistent with applicable public access and recreation policies of the Coastal Act as the locations of the proposed improvements do not impact the public's access to the sea or public paths of the Coastal Trail, nor will they impact any of the recreational marine activities as the project will be a negligible installation within the public right-of way.

Furthermore, to address the concerns in the Coastal Commission's Staff Report pertaining to the potential hindrance to public access as a result of the cameras and the use and/or access to data collected by the cameras, the City contends that the cameras will provide a general public benefit to all for the following reasons:

1. Over the last year, the City has experienced a 43% increase in vehicle burglaries and thefts from vehicles, with a concentration of such crimes near trailheads and public parking lots. As visitors to the City may be experiencing higher crime rates in these publicly accessed areas, the incidents themselves may be the main source in potentially deterring the public's access to the coast.
2. The City contracts for law enforcement services with the Los Angeles County Sheriff's Department, and our Sheriff's Station will have direct access to data captured by the proposed cameras. The Staff Report expresses concern that the camera data is privately owned by the respective HOA community who has sole

access to the footage. However, the Sheriff's Station additionally has direct access to the data, providing an investigatory tool for any crime committed in the community, regardless of residency status. In conjunction with the rise in recent crimes from vehicles, the cameras serve as a valuable investigatory tool.

3. Flock Safety cameras, as proposed in Lunada Pointe and West Portuguese Bend, have been installed in neighborhoods throughout the City, and have been used to investigate and solve multiple crimes, including those installed in adjacent communities in the Coastal Zone.

Specifically, there have been two recent installations of automated license plate-reader (ALPR) cameras within the City's Coastal Zone. In 2016, the City installed ALPR cameras at the entry/exit points from the City, including four in the public-right-of-way near the border with Palos Verdes Estates. Additionally, in 2018, the Oceanfront Estates neighborhood, located adjacent to the Lunada Pointe community installed security cameras, which were later modified to Flock Safety ALPR cameras in 2020. These permits were approved at the local level and were not appealed by the Coastal Commission. Thus far, the City's ALPR network has been used to solve multiple crimes, including grand theft autos, and the Oceanfront Estates cameras have been used to solve crimes including burglaries and thefts. The cameras have not noticeably deterred public access since they were installed.

The proposed Flock Safety camera installations are not by any means intended to discourage public access or give the perception of discouraging access. Instead, the cameras are intended to provide added security and a sense of safety to members of the public, regardless of residency status. As previously noted, similar cameras installed in the City have provided an invaluable investigatory tool for our Sheriff's Station, as they have immediate access to the camera data. The City looks forward to working with Coastal Commission Staff to develop any additional conditions that result in an outcome that benefits all members of the public, including both residents and visitors, and echoes the Applicants' requests that the de novo hearing be continued.

Thank you for your time and consideration of this matter.

Sincerely,

McKenzie Bright
Administrative Analyst

Jaehee Yoon
Senior Planner

cc: Ara Mihranian, City Manager
Karina Bañales, Deputy City Manager
Ken Rukavina, Director of Community Development
Octavio Silva, Deputy Director of Community Development
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