

**CITY OF MANHATTAN BEACH  
COMMUNITY DEVELOPMENT DEPARTMENT  
STAFF REPORT**

**TO:** Planning Commission

**FROM:** Richard Thompson, Director of Community Development

**BY:** Eric Haaland AICP, Associate Planner

**DATE:** July 25, 2007

**SUBJECT:** Coastal Development Permit Amendment to Allow Larger Concrete Pads for Maintenance Vehicle Parking above an Underground Storm Drain Low-Flow Diversion Project on the Public Beach between 27<sup>th</sup> Street and 28<sup>th</sup> Street (Los Angeles County Public Works)

**RECOMMENDATION**

Staff recommends that the Planning Commission **CONDUCT THE PUBLIC HEARING, DISCUSS** the proposal, and **APPROVE** the request.

**APPLICANT**

Los Angeles County Department of Public Works  
900 S. Fremont Ave. 11<sup>th</sup> Floor  
Alhambra, CA 91803

L O C A T I O N

Location L.A. County Beach west of bike path between 27<sup>th</sup> St. & 28<sup>th</sup> St. (See Site Location Map).

Area District III

L A N D U S E

<u>General Plan</u>	Open Space	
<u>Zoning</u>	OS, Open Space	
<u>Land Use</u>	<u>Existing</u>	<u>Proposed</u>
	Public Beach	Public Storm Drain Facility under Beach
<u>Neighboring Zoning/Land Uses</u>	North	OS/Beach
	South	OS/Beach
	East	RH/Residential
	West	OS/Public Beach & Ocean

## PROJECT DETAILS

	<u>Proposed</u>	<u>Requirement (Staff Rec)</u>
Site Size:	15,000 sq. ft.	N/A
Building Floor Area:	None	N/A.
Pavement Area:	2,080 sq. ft.	N/A
Parking:	3 truck spaces	N/A
Vehicle Access	Bikepath via Marine/36 <sup>th</sup> St.	N/A

## BACKGROUND

On October 26, 2005, the Planning Commission approved a coastal permit for a storm drain project primarily under the beach surface between 27<sup>th</sup> and 28<sup>th</sup> Streets. The site is the portion of sandy beach just west of the bike path running the length of the block between 27<sup>th</sup> and 28<sup>th</sup> Streets. The purpose of the project is to divert small quantities of water runoff that occur in relatively dry periods away from the ocean, and into the county sewer system for treatment. The City of Manhattan Beach is a partner in the project supporting the County's goal of improved ocean water quality.

During construction of the project, the size of two concrete pads on the beach surface was substantially enlarged beyond the size approved in the project plans. A concern for the extended pads was originally communicated to the State Coastal Commission, which contacted the city to address the project revision. A substantial change to the plans requires Planning Commission approval of a Coastal Development Permit amendment, which is appealable to the City Council and the State Coastal Commission.

## DISCUSSION

The applicant/county has installed approximately 250 linear feet of concrete pipe underground alongside the county beach bike path, with related manholes, vaults, and an above ground metal control panel cabinet. A connection was made from an existing underground storm drain pipe, extending from 28<sup>th</sup> Street toward the ocean, to existing underground county sewer facilities just south of 27<sup>th</sup> Street. During construction the county determined that it would be appropriate to enlarge the two concrete pads surrounding the facility's vault and manhole covers to provide parking surfaces for vehicles that would be maintaining the facility. The extended pad lengths are 80 feet instead of 18 feet at the north pad, and 80 feet instead of 48 feet at the south pad. The pads are built at the original approved 13-foot width.

The county's attached narrative explains that a large sewer cleanout truck will need to park at the low-flow diversion facility roughly 4 to 9 days a year. The extended pad length will allow trucks to park and complete maintenance activities without obstructing the abutting bike path. Bike path obstruction was a concern of the Planning Commission regarding the initial construction of the project.

The primary concern with the enlarged concrete pads is understood to be aesthetics. It is generally not desirable to interrupt the sandy beach with pavement or structures unless there is a strong public

need for such items. This particular section of the beach historically has a stronger presence of public utilities than other beach segments at least partly due to its proximity to a public park (Bruce's Beach) and lifeguard facility. Photos of the existing finished facilities are attached to this report. The attached letter from a neighboring Strand resident (with petition signatures) objects to the enlarged concrete pads as aesthetically detrimental to a valuable public resource, while not providing a substantial public benefit.

#### Required Findings:

Section A.96.150 of the Local Coastal Program establishes that certain findings be made by the Planning Commission in granting coastal development permit approval. If the Planning Commission accepts that the purpose of the enlarged concrete pads is appropriate, Staff believes that those findings can be made for the amendment proposal as follows:

- A. The project conforms with the certified Manhattan Beach Local Coastal Program in that it is a public works project benefiting ocean water quality that includes minimal visible improvements necessary to achieve that goal.
- B. The project is in conformity with the public access and recreation policies of the California Coastal Act since improved ocean water quality will enhance coastal recreation opportunities, permanent coastal access will not be affected, and the proposed paved services are appropriate for maintaining the facility and adjacent bike path access.

#### **ENVIRONMENTAL REVIEW**

The Project is Categorically Exempt from the requirements of the California Environmental Quality Act (CEQA), pursuant to Section 15301, based on staff's determination that the project is a minor alteration of an existing storm drain facility, and will not have a significant impact on the environment.

#### **CONCLUSION**

Staff supports the request finding that the proposal provides for improved coastal water quality while maintaining adequate beach bike path access, and conforms to the City's Local Coastal Program

A draft Resolution of approval is attached, which would act as the actual Coastal Development Permit, if the project is approved by the Commission with no further appeal. Several standard conditions typically included in a separate coastal permit document have been placed in the resolution as well as some special conditions.

#### Attachments:

- Photos
- Draft Resolution No. PC 07-

Applicant material  
Neighbor Letter

- c: LA County Public Works Dept., Applicant  
LA County Dept. of Beaches & Harbors  
Jim Arndt, Public Works Director  
Dana Greenwood, City Engineer

North Concrete Pad



South Concrete Pad





**RESOLUTION NO PC 07-**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF MANHATTAN BEACH APPROVING A COASTAL DEVELOPMENT PERMIT AMENDMENT TO ALLOW ENLARGED CONCRETE SURFACE PADS FOR A STORM DRAIN LOW FLOW DIVERSION PROJECT UNDER THE PUBLIC BEACH BETWEEN 27<sup>TH</sup> STREET AND 28<sup>TH</sup> STREET (Los Angeles County Public Works)**

**THE PLANNING COMMISSION OF THE CITY OF MANHATTAN BEACH DOES HEREBY RESOLVE AS FOLLOWS:**

SECTION 1. The Planning Commission of the City of Manhattan Beach hereby makes the following findings:

- A. The Planning Commission of the City of Manhattan Beach conducted a public hearing pursuant to applicable law on July 25, 2007, to consider an application for a coastal development permit amendment for a storm drain low flow diversion project under the public beach between 27<sup>th</sup> Street and 28<sup>th</sup> Street in the City of Manhattan Beach. The original Coastal Development Permit was approved on October 26, 2005.
- B. The public hearing was advertised pursuant to applicable law, testimony was invited and received.
- C. The applicant for the Coastal Development Permit is the Los Angeles County Public Works Department, The property/beach is owned by Los Angeles County.
- D. The applicant proposes to extend the length of two approved concrete pads on the beach surface to be 80 feet long to serve a 250 linear feet of concrete pipe underground alongside the county beach bikepath.
- E. The property is located within Area District III and is zoned OS Open Space. The surrounding land uses consist of single and multiple family residences, a lifeguard headquarters facility, a public park, and public beach.
- F. The General Plan designation for the property is Open Space, and the Local Coastal Program/Land Use Plan designation is also Open Space.
- G. The Project is Categorically Exempt from the requirements of the California Environmental Quality Act (CEQA), pursuant to Section 15301 based on staff's determination that the project is a minor alteration of an existing storm drain facility, and will not have a significant impact on the environment.
- H. The project will not individually nor cumulatively have an adverse effect on wildlife resources, as defined in Section 711.2 of the Fish and Game Code.
- I. The project is in accordance with the objectives and policies of the Manhattan Beach Coastal Program, as follows:
  1. The proposal is consistent with the surrounding coastal zone area and complies with the applicable standards of the Manhattan Beach Coastal Zone Zoning Code.
  2. The project conforms with the certified Manhattan Beach Local Coastal Program in that it is a public works project benefiting ocean water quality that includes minimal visible improvements necessary to achieve that goal.
  3. The project is in conformity with the public access and recreation policies of the California Coastal Act since improved ocean water quality will enhance coastal

recreation opportunities, permanent coastal access will not be affected, and the proposed paved services are appropriate for maintaining the facility and adjacent bike path access.

- K. The project is consistent with the public access and recreation policies of Chapter 3 of the California Coastal Act of 1976, as follows;

Section 30212 (a) (2): The proposed facility does not impact public access to the shoreline, and adequate public access is provided and shall be maintained along The Strand, 27<sup>th</sup> Street, and 28<sup>th</sup> Street .

Section 30221: The project goal of improved ocean water quality will enhance coastal recreation opportunities.

- L. This Resolution upon its effectiveness constitutes the Coastal Development Permit for the concrete pad enlargement for the original low flow diversion storm drain project.

**SECTION 2.** The Planning Commission of the City of Manhattan Beach hereby **APPROVES** the subject Coastal Development Permit amendment subject to the following conditions:

Standard Conditions

1. *Compliance.* All development must occur in strict compliance with the proposal as set forth in the application for said permit, subject to any special conditions set forth below. Any substantial deviation from the approved plans must be reviewed and approved by the Planning Commission.
2. *Expiration.* The Coastal Development Permit shall be approved for a period of two years after the date of approval, with the option for future extensions, in accordance with the Manhattan Beach Municipal Code (MBMC) Section 10.84.090.
3. *Interpretation.* Any questions of intent or interpretation of any condition will be resolved by the Planning Commission.
4. *Inspections.* The Community Development Department Staff shall be allowed to inspect the site and the development during construction subject to 24-hour advance notice.
5. *Assignment.* The permit may be assigned to any qualified persons subject to submittal of the following information to the Director of Community Development:
  - a. a completed application and application fee as established by the City's Fee Resolution;
  - b. an affidavit executed by the assignee attesting to the assignee's agreement to comply with the terms and conditions of the permit;
  - c. evidence of the assignee's legal interest in the property involved and legal capacity to undertake the development as approved and to satisfy the conditions required in the permit;
  - d. the original permittee's request to assign all rights to undertake the development to the assignee; and,
  - e. a copy of the original permit showing that it has not expired.
6. *Terms and Conditions are Perpetual.* These terms and conditions shall be perpetual, and it is the intention of the Director of Community Development and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.



7. *Effective Date.* This Resolution shall become effective when all time limits for appeal as set forth in MBMC Section 10.100.030, and the City of Manhattan Beach Local Coastal Program - Implementation Program Section A.96.160 have expired; and, following the subsequent Coastal Commission appeal period (if applicable) which is 10 working days following notification of final local action.

Special Conditions

8. The subject Coastal Development Permit will be implemented in conformance with all provisions and policies of the Certified Manhattan Beach Local Coastal Program (LCP) and all applicable development regulations of the LCP - Implementation Program.
9. The final construction plans shall be in substantial conformance with the plans for the overall project as approved by the Planning Commission on October 26, 2005 except that the subject concrete pads shall each be permitted to be 80 feet long.
10. The applicant agrees, as a condition of approval of this project, to pay for all reasonable legal and expert fees and expenses of the City of Manhattan Beach, in defending any legal actions associated with the approval of this project brought against the City. In the event such a legal action is filed against the project, the City shall estimate its expenses for the litigation. Applicant shall deposit said amount with the City or enter into an agreement with the City to pay such expenses as they become due.

SECTION 3. Pursuant to Government Code Section 65009 and Code of Civil Procedure Section 1094.6, any action or proceeding to attack, review, set aside, void or annul this decision, or concerning any of the proceedings, acts, or determinations taken, done or made prior to such decision or to determine the reasonableness, legality or validity of any condition attached to this decision shall not be maintained by any person unless the action or proceeding is commenced within 90 days of the date of this resolution and the City Council is served within 120 days of the date of this resolution. The City Clerk shall send a certified copy of this resolution to the applicant, and if any, the appellant at the address of said person set forth in the record of the proceedings and such mailing shall constitute the notice required by Code of Civil Procedure Section 1094.6.

I hereby certify that the foregoing is a full, true, and correct copy of the Resolution as adopted by the Planning Commission at its regular meeting of July 25, 2007 and that said Resolution was adopted by the following vote:

**AYES:**

**NOES:**

**ABSTAIN:**

**ABSENT:**

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**RICHARD THOMPSON,**  
Secretary to the Planning Commission

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**Sarah Boeschen**  
Recording Secretary

## PROJECT NARRATIVE

### TITLE: MANHATTAN BEACH (28TH STREET) DRAIN - LOW FLOW DIVERSION

#### DESCRIPTION:

This project will divert low flows from an existing storm drain to an existing sanitary sewer system for treatment at a sewage treatment facility.

#### SCOPE:

- Construct 8" berm inside existing 4' H x 6' W storm drain.
- Construct 16' of 18" Reinforced Concrete Pipe (RCP).
- Construct 2-72" manholes, one at 28th Street just west of the existing bike path and one at 27th Street just west of the existing bike path.
- Construct 214' of 84" RCP between the two 72" manholes.
- Construct a manhole at the midpoint of the 84" RCP.
- Construct a valve vault, sewer manhole, and polyethylene piping to connect to an existing sanitary sewer system.
- Construct concrete pads for maintenance vehicles (see plans)
- Install a pump within one of the manholes and a pump control panel adjacent to the existing bike path.

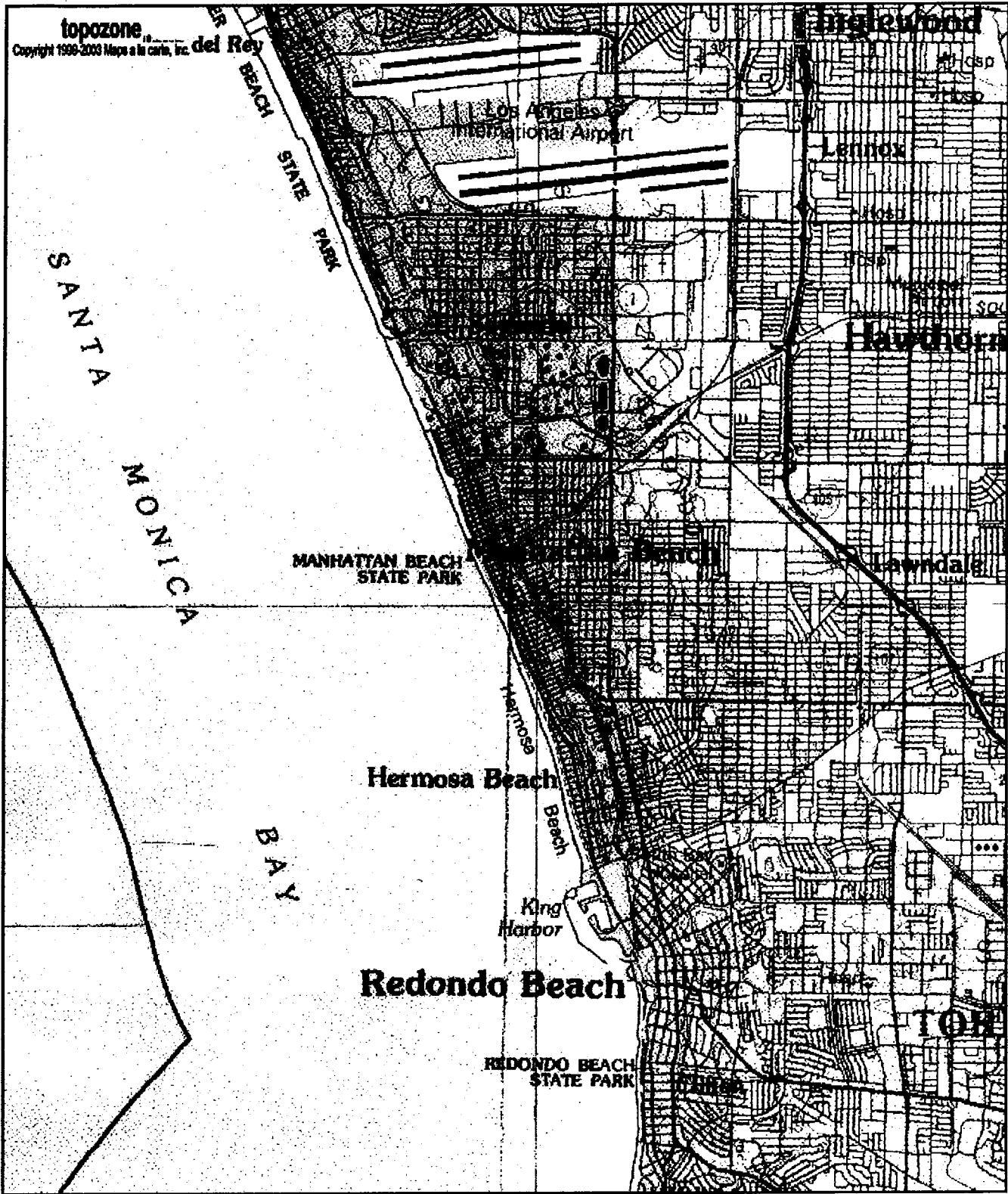
#### ADDITIONAL INFORMATION:

The only visible portions for the subject project will be the 2-72" manhole covers, valve vault cover, control panel, sewer manhole cover, the manhole cover at the midpoint of the 84" RCP, and concrete pad.

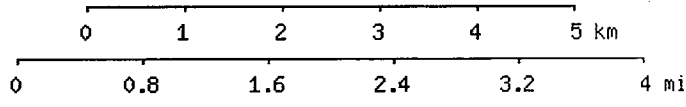
Shoring Requirements: LA County Public Works has performed a subsurface investigation at the project site resulting in a log of boring and shoring parameters. Typically, LA County Public Works will have the contractor submit their shoring plans for approval before any excavation occurs.

The LA County Bikeways Coordinator indicated that if we can maintain 8 feet of clear bikepath, bikers would be allowed to walk their bikes past the construction site. We would be required to post signs a minimum of 100 feet prior to the construction site, and security fencing needs to be set up such that the bikepath narrowing is gradual, rather than at a right angle to the bikepath.

NOTE: All work for this project has been completed. The scope of work for this amended permit application is for the construction of the concrete pads for vehicle maintenance.



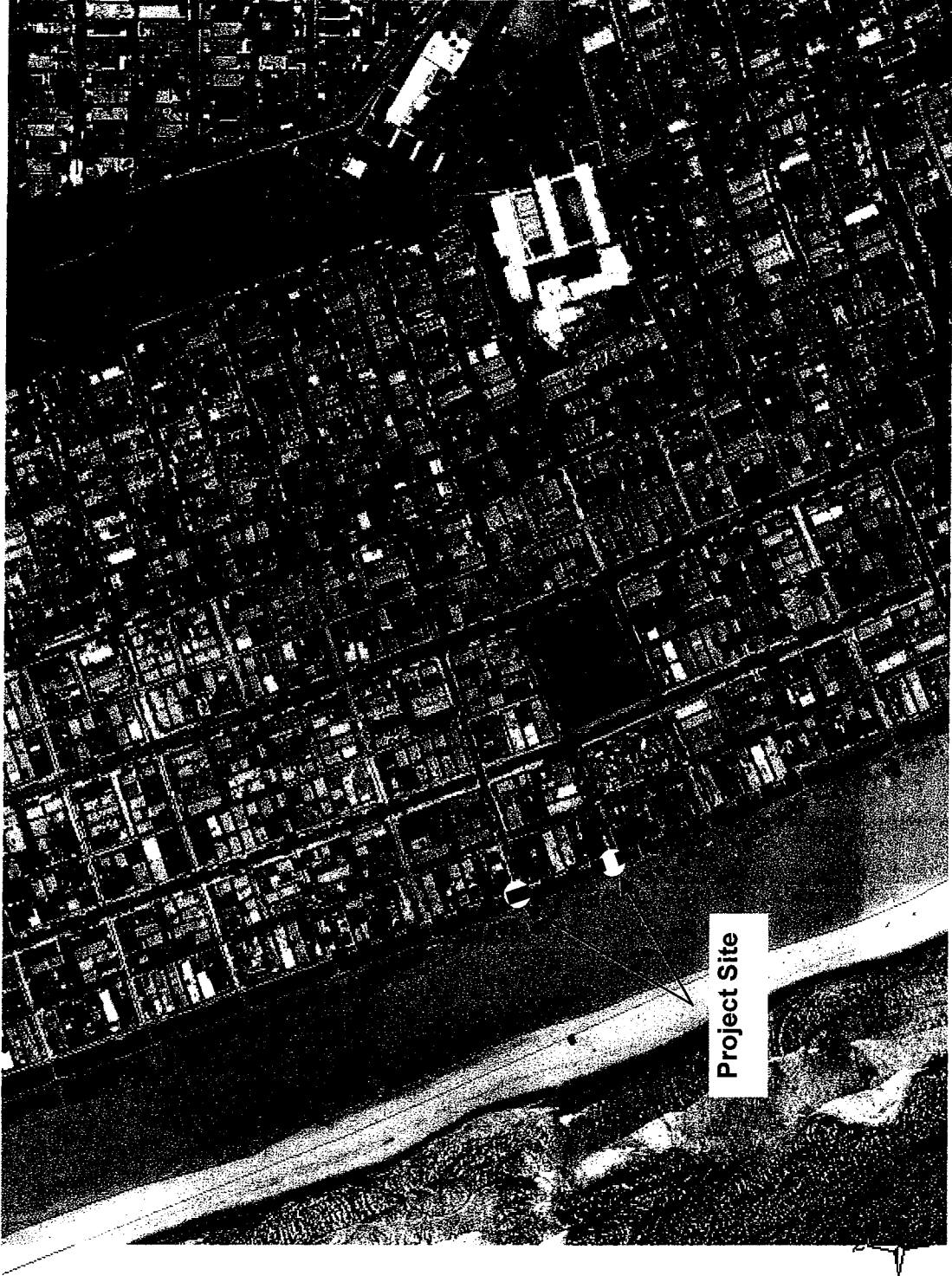
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 Copyright 1999-2003 Maps & la carte, Inc.



UTM 11 369606E 3750074N (NAD27)  
**Manhattan Beach, USGS VENICE (CA) Quadrangle**  
 Projection is UTM Zone 11 NAD83 Datum



M=13.518  
 G=-0.787

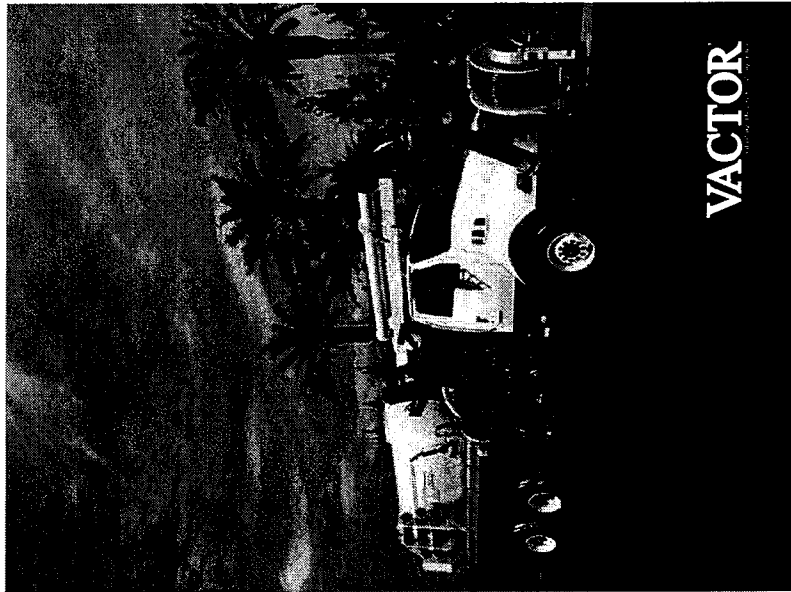


**Radius Map For Project No. 286 - LFD**

## **Attachment A**

### **PROJECT NO. 286 – LOW-FLOW DIVERSION**

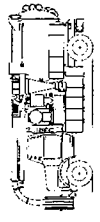
The concrete pads around the low flow diversions were constructed to facilitate maintenance and cleaning activities for the project. The pads were built to accommodate sewer cleaning Vactor® truck (see attached for specifications). During a year of average rainfall, cleaning of the low-flow diversions will occur approximately 2-3 times a year and typically last approximately 2-3 days each time. Thus for a year of average rainfall, the maintenance crew will be required to be on site for a total of 4-9 days per year. Because of the presence of the as-built concrete pads, the bikeway adjacent to the low-flow diversion will not be required to close during maintenance. There will be sufficient clearance for pedestrians to travel on the bike path without significant risk due to maintenance activities. Without the concrete pads, bikeways would be temporarily closed while crews perform maintenance and pedestrians would then be required to traverse around the maintenance crews. This would, in turn, increase pedestrian traffic on the surrounding streets causing an increased risk to public safety.



**VACTOR**  
THE WORLD'S MOST POWERFUL CLEANING SYSTEM

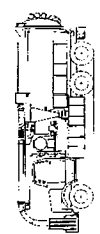
**Dimension Specifications**

Note: Dimensions are dependent on their relative optional equipment and water capacity.



Vactor 2100 Series - Displacement

- Single axle axle
- VSR 35 to 6173 mm
- CA 15 to 1440 mm
- AF 75 to 1440 mm
- 20,000 lb. max. (9,072 kg)
- 20,000 lb. max. (9,072 kg)
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- 40,000 lb. max. (18,144 kg)
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**Additional Options**

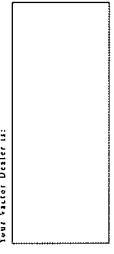
- Over 100 optional equipment items
- Multi-flow for Packer system
- Cold weather recirculation system
- Liquid deicer pump-off system
- Debris flush-out system
- Full-leaf hydraulic door loading system
- Water tank capacity up to 2,000 gallons (7,570 L)
- Heating system up to 300 sqm
- Hot-air pre-heat up to 1,000 ft<sup>2</sup> (93 m<sup>2</sup>)
- Accumulator

**Value-Added Services**

- Vactor maintenance on the customer's premises
- On-site delivery
- Factory trained worldwide dealer network for assistance with service and maintenance
- Specific on-site training, manuals and specific on-site training
- General Performance Method (GPM)™
- Training center with hands-on instruction for operators and crews presented
- Customized timing and financial services

**Warranty**

The Vactor 2100 series is warranted against material and workmanship defects for a period of 12 months from the date of delivery to the original purchaser. 1 year warranty on the original purchaser. 1 year and 10 years on the water tank. Optional extended warranty packages are available. For more information, contact your nearest Vactor distributor.



Vactor Street Sweeper, Inc.  
 1100 West 10th Street  
 Suite 100  
 Fargo, ND 58103  
 Phone: 701-785-1100  
 Fax: 701-785-1101  
 Website: www.vactor.com

**Vactor 2100 Series**

**The World's Most Powerful Cleaning System**

2100 Series machine offers Vactor's proprietary system of integrated components, specifically designed for water and debris removal. Components work together to deliver maximum cleaning power and efficiency where it counts: at the curb.



- Exclusive Air Packer Water Pump**
- Pack Water Pump provides direct air through obstructions and loose pipes.
  - Single pump, air-rotary design and hydraulic drive for longer life and less maintenance.
  - Located 100% below the water supply for greater power and no cavitation.



- Thin-Wing, Leading-Edge Roll & Hydraulic Drum**
- Beams roll and work together to create outstanding maneuverability and productivity.
  - Allow clearing of multiple lanes without reworking road.
  - Complete curved head or roll for ability and efficiency.
  - Optional automatic high-pressure concentrate on its work, instead of the low roll.



- Shock High-Performance Hair™ (Optional)**
- Made of high-strength, reinforced rubber construction offers undetectable flexibility and maximum reliability.
  - Allows tighter bend, longer run, lighter pressure.
  - Remains flexible in temperature extremes.
  - The largest diameter hair available: last up to 5 times longer than plastic hair.



- High-Performance Nozzle (Optional)**
- Converts wastewater and pressure into almost 20x more efficiency than ordinary nozzles.
  - High-pressure, high-velocity water: minimizes number of runs, less wear and fuel consumption.
  - Tested with a shock hose, creates the most effective, high-performance cleaning system in the industry.

**Enhance Productivity With Vactor's Advanced Options**

**High-Flow**

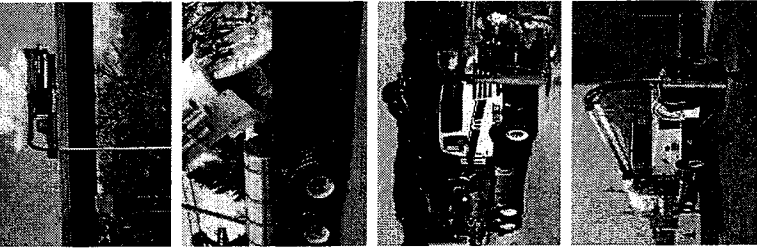
- Large diameter brush for high flow
- 100% duty cycle
- 100% duty cycle
- 100% duty cycle
- 100% duty cycle

**High-Flow**

- 100% duty cycle
- 100% duty cycle
- 100% duty cycle
- 100% duty cycle
- 100% duty cycle

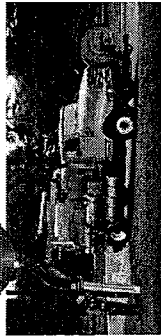
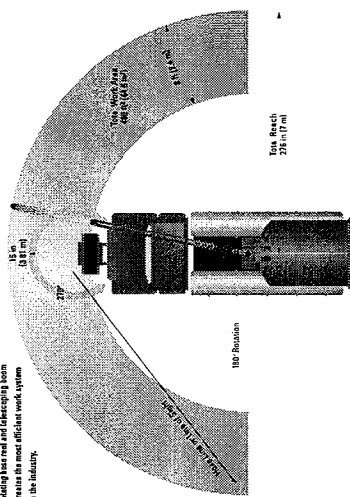
**High-Flow**

- 100% duty cycle
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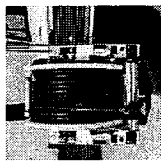


## Outstanding Maneuverability

The unique design allows the telescoping handle to be raised and lowered to clear the most difficult work spaces in the industry.



**Telescoping Handle**  
Provides 180° of reach for optimum versatility and performance. Extended and retracted, it allows the operator to work in the most difficult work spaces for the wastewater industry. Telescoping handle for better maneuverability and performance.



**Telescoping Handle**  
Ergonomic design reduces the chance of injury due to the weight of the unit. The telescoping handle is made of high-strength, low-alloy steel and is designed for long life. The telescoping handle is made of high-strength, low-alloy steel and is designed for long life. The telescoping handle is made of high-strength, low-alloy steel and is designed for long life.

### 1. High Hydraulic Flow

Provides efficient flow and top-down lift and light movement with full 180° rotation for easy positioning into high-reach areas. High flow rate provides power cleaning efficiency and maintains pressure throughout the entire cleaning operation.

### 2. Forward Rotation Displacement System

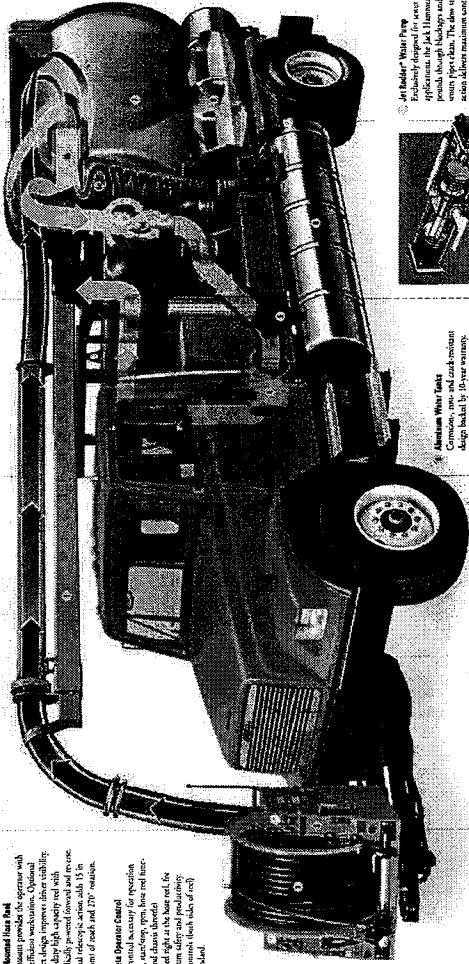
Power is transmitted directly through a 475 hp rated continuous-duty transfer case. Efficient drive, pulley, clutch, bearing efficiency and reliability. High volume up to 1,500 cfm and 180° rotation.

### 3. Multi-Flow Heavy Fibrous Filter

Exclusive Vortex design provides unmatched heavy protection to ensure optimum service life and productivity. All-polymer design for superior durability. Multi-flow design allows for liquid debris removal.

### 4. Rear Load Over Drive Shaft Body

SA and steel frame design provides superior protection from potential contaminants. Made of 304 (1 1/2" x 1/2") stainless steel. The 1 1/2" x 1/2" frame is a heavy-duty single-shaft-bearing hydraulic cylinder. Capable of lifting up to 15,000 lbs.



### American Water Works

Corrosion, rust, and arch resistant design backed by 15-year warranty. Built for long life and high strength and durability.



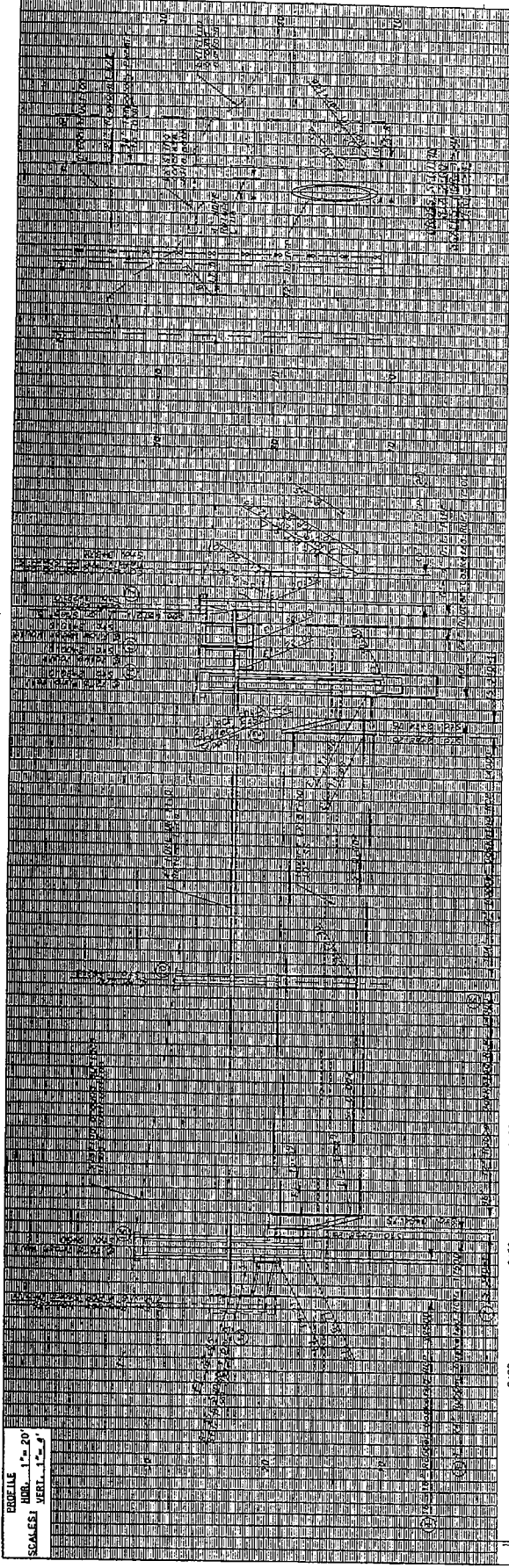
### Jet Injector Water Pump

Engineered for water cleaning applications. Jet Injector water pump provides superior cleaning performance. Jet Injector water pump provides superior cleaning performance. Jet Injector water pump provides superior cleaning performance.

**Victor® 2100 Series Positive Displacement Sewer Cleaner**  
A Superior Machine. Designed for Unmatched Job Versatility and Performance.

© 1998 Victor® 2100 Series Positive Displacement Sewer Cleaner

SCALE: HORIZ. 1" = 20'  
VERT. 1" = 4'



**Branch Mark**

BL Y0376 (7/28/00) Elev. 33.515  
 PNB 0716 PG. 555  
 BR oap in work 15.2 M N & 1.8 M E/O JNT  
 The Strand & 28TH ST WMD MB-1

**NOTES:**

1. Construct 6" thick reinforced concrete pad with cut-off wall ground pump well, catch well, manhole, and section of 12" RCP on Sheet 4. Slope concrete pad 2% seaward.
2. 3 feet minimum cover required on all RCP piping.
3. Remove interfering portions of existing 8" abandoned vent

**REVISIONS**

NO.	DATE	DESCRIPTION

**PROJECT NO. 286**  
 COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS  
 MANHATTAN BEACH STORM DRAIN  
 LOW FLOW DIVERSION AT 28TH STREET

**PLAN AND PROFILE**

PROJECT ENGINEER: **RAY DAVIS**  
 CIVIL ENGINEER

DATE: \_\_\_\_\_

**BEACH COUNTY**

ORIGINAL CONC. PAD PREVIOUSLY APPROVED

CONCRETE PAD (AS-BUILT)

MANHATTAN BEACH

DETAIL "A" (SHEET 3)



**WILLIAM G. CARAS**  
ATTORNEY AT LAW  
1801 AVENUE OF THE STARS  
SUITE 600  
LOS ANGELES, CALIFORNIA 90067  
TELEPHONE (310) 284-8830  
FACSIMILE (310) 284-8115

July 16, 2007

Mr. Richard Thompson  
Director of Community Development  
City of Manhattan Beach  
1500 Highland Ave.  
Manhattan Beach, CA 90266

VIA HAND DELIVERY

RE:File # CA 07-14/ Parking Pads on Beach at 27-28<sup>th</sup> Street/ July 25 PC Hearing Date

Dear Mr. Thompson:

Please accept this letter as written comments for inclusion in the staff report for the above described application. I reside at 2712 The Strand. The enlarged concrete parking pads placed on the beach at 27<sup>th</sup> and 28<sup>th</sup> Streets by the County of Los Angeles in violation of the City permit and therefore the local Coastal Plan are highly objectionable for several reasons.

First, from the standpoint of the concept of protection of the coastline, one can imagine no issue worthy of more intensive scrutiny than permanent construction or paving on the actual beach sand. Any such development must present a compelling justification to overcome what is justifiably a very high interest in preserving natural conditions. Clearly, "parking convenience" for maintenance men does not come close to being a compelling reason. It is reasonable to conclude that the large pads are not a necessity both from the fact that the original engineering did not specify it, as well as the common sense observation that the two lane bike path can be reduced to one lane during the infrequent times work is needed. Other parking solutions are also available.

Second, from an aesthetic standpoint, the pads are, quite simply, an eyesore. Where there were previously dunes and an idyllic view of the beach, there are now thousands of square feet of unattractive concrete and barren graded sand. Additionally, the pads are being "maintained" by constantly grading the adjacent areas to remove the naturally reoccurring dunes. The beach/ bike path junction naturally had, and in the areas not subject to this maintenance still has, dunes, while the subject area is flat and industrial looking. The grading also prevents the foliage from reestablishing, and as a result during windy times, the downwind homes are now pelted with sand.

Third, EVERYONE I have personally spoken with is strongly opposed to the pads remaining, and I have spoken with a large number of people concerning this. Attached is a brief

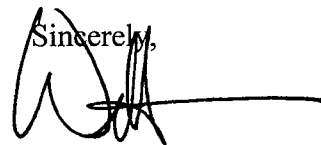
Petition so stating signed by nearly all of the residents of just the block across from the pads. This is something we have done just as a casual, unfocused effort. I am quite sure if there were any point to doing so, the number of signatories could be exponentially increased in relatively short order.

Fourth, I understand the County has claimed that they want the pads so they can avoid having to close a lane of the bike path when they do their work. As you can see from the attached photo taken recently, this claim is specious. The County has no aversion to blocking the bike path, even when it is obviously unnecessary to do so.

Fifth, there is a certain degree of what could be called arrogance by intentionally deviating from the approved plans in a clearly unpermitted expansion of the project. This attitude continued after the fact. For over five months, the County filed no official request to gain approval for their illegitimate construction until the Coastal Commission threatened enforcement and a local paper ran a story exposing the situation. It hardly seems appropriate to reward this "ask for forgiveness when you get caught" approach.

In sum, we trust the City to protect our beach by requiring the removal of the concrete beyond what was applied for and approved in the original permit. Because we view this as a matter of importance to our quality of life, we are prepared to take whatever steps, at whatever level, necessary to have the pads removed. Also, the grading and defoliation of the surrounding areas should cease. Incidentally, there still remains debris from the construction mixed in with the sand in the surrounding areas, which should be removed.

Thank You.

Sincerely,  


William G. Caras

WGC/cq

City of Manhattan Beach  
Planning Commission

Dear Commissioners:

We the undersigned are residents of Manhattan Beach and are strongly opposed to the approval of the modification of the 28<sup>th</sup> Street Storm Drain Project Permit. In particular, we do not want the two enlarged concrete parking pads to remain on the beach.

The pads were built in contravention of the approved plans and permits and are eyesores. The pads have altered the natural contours of the beach there and have a negative aesthetic impact on the beach views. We feel that beach views are of paramount importance to our community and quality of life. The little extra inconvenience to maintenance personnel does not out weigh the negative impact on the beauty of the beach.

PLEASE REQUIRE THE COUNTY TO REDUCE THE SIZE OF THE TWO PADS TO THE SIZE THEY ORIGINALLY APPLIED FOR AND THAT WAS APPROVED.

THANK YOU.

Bill Christie Caras  
Name

2712 The Strand  
Address

Scott Ruder  
Name

429 29<sup>th</sup> St MB  
Address

Lawrence Meyer  
Name

2704 Strand  
Address

Isabelle Meyer  
Name

2704 Strand  
Address

J. J. Young  
Name

2800 The Strand  
Address

[Signature]  
Name

401 27<sup>th</sup> Street  
Address

Rich Walker  
Name

2704 The Strand, MB  
Address

Mary Zimm  
Name

2720 The Strand MB  
Address

Ross Nathan  
Name

2808 The STRAND "  
Address

John Hill  
Name

2816 The STRAND  
Address

[Signature]  
Name

2720 The Strand MB.  
Address

J. Mando  
Name  
K. Mando  
Name

2720 Ocean DR. MB 90266  
Address  
2720 OCEAN DRIVE MB 9026  
Address

Tony Chocake  
Name

2708 The Strand. MB 9002  
Address

\_\_\_\_\_  
Name

\_\_\_\_\_  
Address

\_\_\_\_\_  
Name

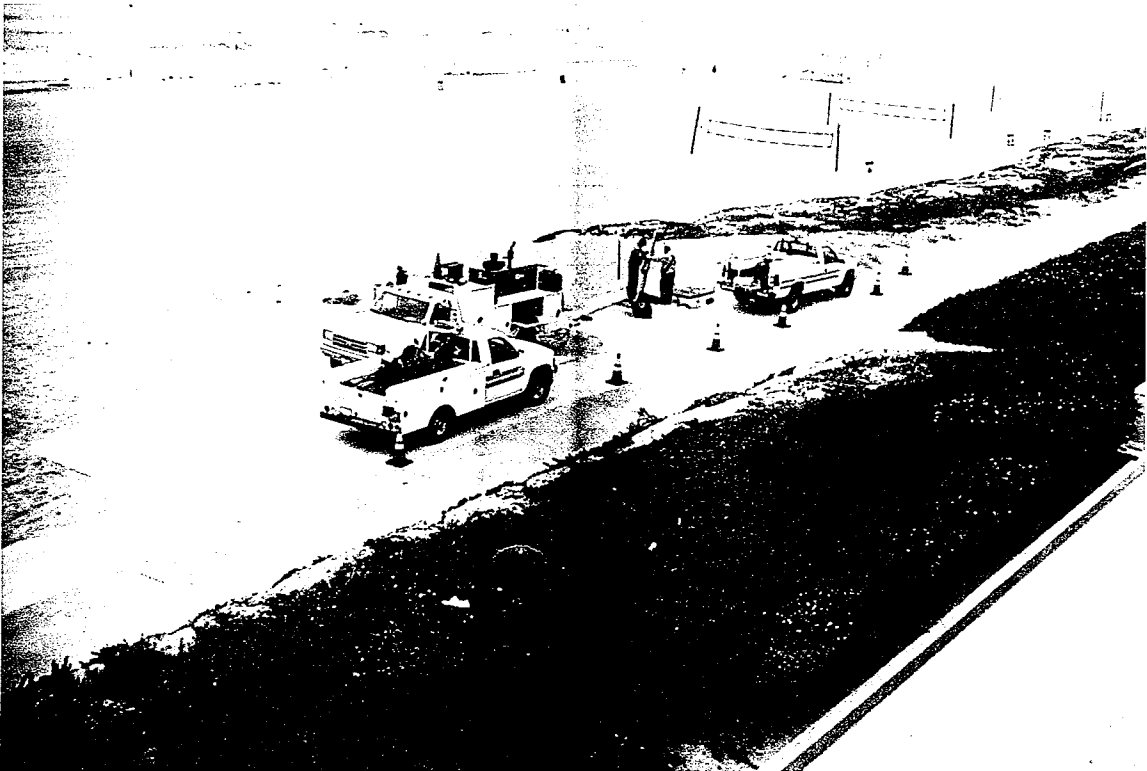
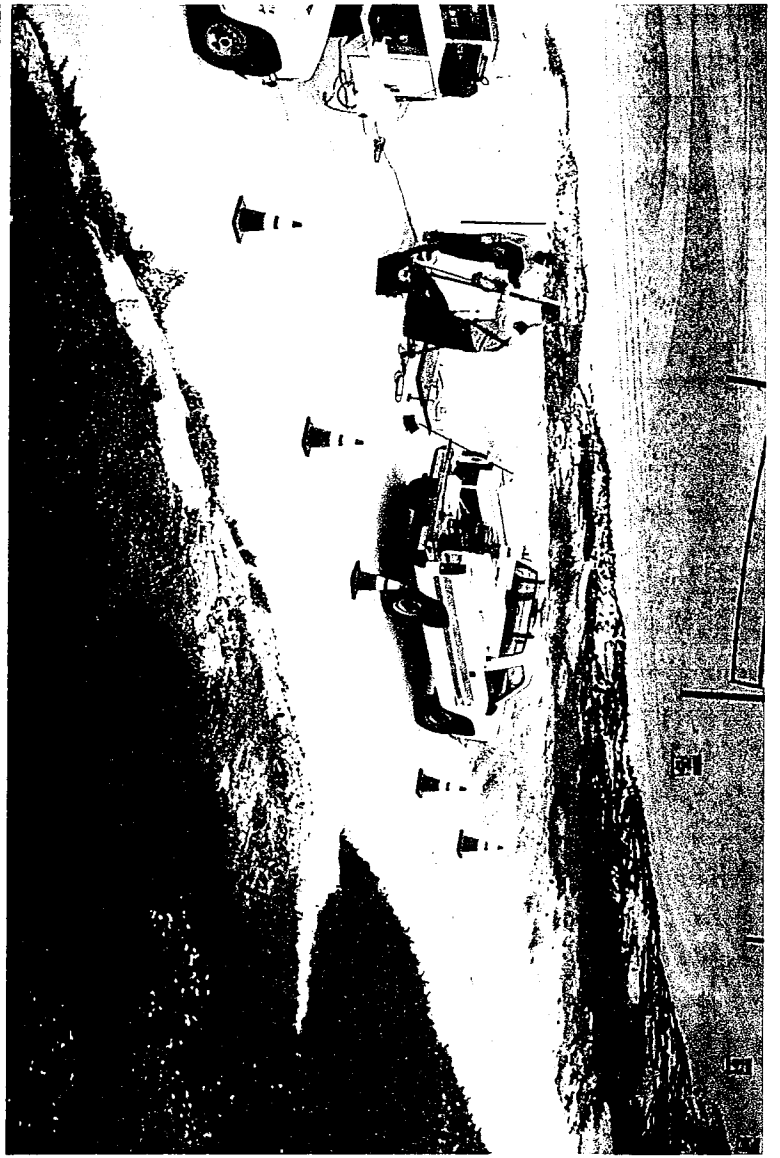
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**WILLIAM G. CARAS**  
ATTORNEY AT LAW  
1801 AVENUE OF THE STARS  
SUITE 600  
LOS ANGELES, CALIFORNIA 90067  
TELEPHONE (310) 284-8830  
FACSIMILE (310) 284-8115

July 16, 2007

Mr. Richard Thompson  
Director of Community Development  
City of Manhattan Beach  
1500 Highland Ave.  
Manhattan Beach, CA 90266

VIA HAND DELIVERY

RE:File # CA 07-14/ Parking Pads on Beach at 27-28<sup>th</sup> Street/ July 25 PC Hearing Date

Dear Mr. Thompson:

Please accept this letter as written comments for inclusion in the staff report for the above described application. I reside at 2712 The Strand. The enlarged concrete parking pads placed on the beach at 27<sup>th</sup> and 28<sup>th</sup> Streets by the County of Los Angeles in violation of the City permit and therefore the local Coastal Plan are highly objectionable for several reasons.

First, from the standpoint of the concept of protection of the coastline, one can imagine no issue worthy of more intensive scrutiny than permanent construction or paving on the actual beach sand. Any such development must present a compelling justification to overcome what is justifiably a very high interest in preserving natural conditions. Clearly, "parking convenience" for maintenance men does not come close to being a compelling reason. It is reasonable to conclude that the large pads are not a necessity both from the fact that the original engineering did not specify it, as well as the common sense observation that the two lane bike path can be reduced to one lane during the infrequent times work is needed. Other parking solutions are also available.

Second, from an aesthetic standpoint, the pads are, quite simply, an eyesore. Where there were previously dunes and an idyllic view of the beach, there are now thousands of square feet of unattractive concrete and barren graded sand. Additionally, the pads are being "maintained" by constantly grading the adjacent areas to remove the naturally reoccurring dunes. The beach/ bike path junction naturally had, and in the areas not subject to this maintenance still has, dunes, while the subject area is flat and industrial looking. The grading also prevents the foliage from reestablishing, and as a result during windy times, the downwind homes are now pelted with sand.

Third, EVERYONE I have personally spoken with is strongly opposed to the pads remaining, and I have spoken with a large number of people concerning this. Attached is a brief

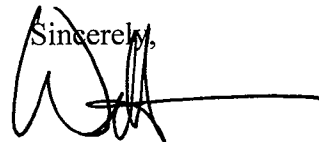
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William G. Caras

WGC/cq