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DECLARATION OF JULIANNA FARRELL

I, Julianna Farrell, declare:

1. I am over the age of 18. Everything contained herein is from my own personal knowledge, and if called to testify I would and could testify to the same.

2. I have been a paralegal employed with The Law Offices of Worthington & Caron, P.C. located at 273 W. 7th St. in San Pedro, California, since 2012.

3. On August 30, 2017, I answered a call at my office from a man introducing himself as Tom Piana. He explained that my employer, Roger Worthington, is the owner of a property located at 207 Calle Conchita in San Clemente and that he is in escrow on the purchase of a lot directly below Mr. Worthington's home. Mr. Piana reported that his lot was located at 217 Vista Marina. Mr. Piana said that he had a solution for Mr. Worthington's "water runoff issue."

4. I took detailed notes from my conversation with Mr. Piana on August 30, 2017. Mr. Piana asked Mr. Worthington to donate the small corner of his lot where it meets Vista Marina, right next to the little retaining wall, approx. 600 – 800 square feet. He said with the added space he would be able to turn the half circle right there into a true and full cul-de-sac and a legal street. He offered to pay to install a new retaining wall on Mr. Worthington's property.

5. Mr. Piana said that the benefit of a full cul-de-sac/legal street would be that the city would then bring full utilities down to that end of Vista Marina. As it is now, he said, there was not a proper storm drain, or fire hydrant, and fire trucks could not come down the street because they could not turn around at the end, making the area more susceptible to wildfire. He also stated that the property at the bottom of the hill was lined with Lemonade Berry shrubs, which he described as desirable for being fire resistant.

6. Mr. Piana then explained the proposed benefits to Mr. Worthington. He said he would like to collect the runoff from Mr. Worthington's slope which would then run through a bio-drain, a natural filtration system using rocks and sand, and eventually run out to a proposed city storm drain, which then would run out to the sea. He said that for Mr. Worthington to comply with various rules in the construction of his home on the canyon edge, he would have to install pumps and drains and filters as required by the city. He said that with his solution, Mr. Worthington would only need to install a disburser on the house so that the runoff evenly flowed

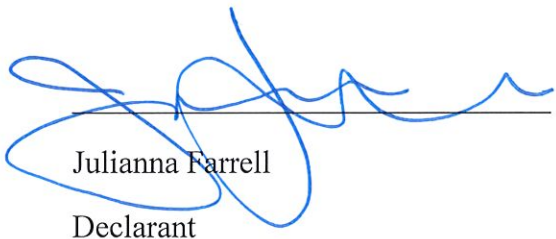
1 down to Mr. Piana’s proposed collection tanks. Mr. Piana said that he believed his solution would potentially
2 save Mr. Worthington anywhere from \$70,000 to \$100,000.

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4 7. Mr. Piana also described his proposed development. The house he planned to build would be split
5 level and “artsy” per his wife of 35 years, inspired by Andrew Lloyd Wright. It would have a living green roof,
6 and it would not impede anyone’s view. He said the last two owners of the lot sold because the city voted out
7 their building plans for being too big.

8 8. He said if he and Mr. Worthington could connect and agree on this solution, Zach at the planning
9 and Building Department “will get it pushed through.” He said he was trying to set up a staff meeting at the end
10 of the following week with Chris Wright from the City Planning Department, and that he would like to discuss
11 these plans so the City would agree to draw up plans to bring utilities down to Vista Marina.

12
13 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and
14 correct.

15 Executed February 2, 2024, in San Pedro, California

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17 
18 Julianna Farrell
19 Declarant