

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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**F10f**

Filed: 2/27/2014  
180th Day: 8/18/2014  
Staff: Z. Rehm-LB  
Staff Report: 5/22/2014  
Hearing Date: 6/13/2014

**STAFF REPORT: REGULAR CALENDAR**

**Application Number:** 5-14-0124

**Applicant:** 521 Vernon LLC (Matt Crabbs, Managing Member)

**Agent:** David Crimmins

**Project Location:** 521 Vernon Avenue, Venice, City of Los Angeles, County of Los Angeles; APN 4240-014-012

**Project Description:** Demolition of 1,316 sq. ft. duplex and construction of 3,650 sq. ft. 30' high two-story single family residence, attached two-car garage, landscaping, swimming pool, and perimeter walls/fences

**Local Approval:** City of Los Angeles Director of Planning Sign-Off

**Staff Recommendation:** Approval with Standard Conditions

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**SUMMARY OF STAFF RECOMMENDATION**

The proposed development is demolition of a 1,316 sq. ft. duplex and construction of a 3,650 sq. ft. 30' high two-story single family residence, attached two-car garage, landscaping, swimming pool, and perimeter walls/fences. The subject parcel is sited on flat terrain one-half mile inland of the beach in a fully developed residential neighborhood in the Oakwood sub-area of Venice.

The proposed project provides three on-site parking spaces, accessed from the alley, which is an improvement over the current situation with one on-site parking space accessed from the street.

The applicant proposes a temporary erosion control plan during construction and best management practices for drainage and irrigation are incorporated into the proposed roof and landscaping plans.

The proposed project has received approval from the City of Los Angeles Planning Department (Case # DIR 2014-0109-VSO-MEL) and is consistent with the R1.5-1 (Low-Medium Multi-Family) zoning designation and surrounding land uses. The proposed 30' structure conforms to the Venice Specific Plan height limit for varied rooflines in the Oakwood/Milwood/SE Venice subarea. The street-fronting portion of the roof is 25' high. No roof access structures or roofdecks are proposed. The footprint of the structure is 24% less than allowable under the City of Los Angeles Zoning Code and the Venice Specific Plan.

As submitted, the proposed development is consistent with Chapter 3 of the Coastal Act. Therefore staff recommends approval of Coastal Development Permit Application 5-14-0124 with standard conditions. **The motion necessary to carry out the staff recommendation is on page four of this report.**

Staff Note:

Section 30600(b) of the Coastal Act allows local government to assume permit authority prior to certification of a local coastal program. Under that section, the local government must agree to issue all permits within its jurisdiction. Pursuant to Section 30600(b) of the Coastal Act, in 1978, the City of Los Angeles opted to issue its own coastal development permits prior to certification of a Local Coastal Program (LCP), except for those permits eligible for issuance as administrative coastal development permits that would be issued by the Executive Director under section 30624. Such development under 30624 included: 1) improvements to any existing structure; 2) any single-family dwelling; 3) any development of four dwelling units or less within any incorporated area that does not require demolition; and 4) any other development not in excess of one hundred thousand dollars. For projects that qualify for an administrative coastal development permit, the Executive Director has the discretion to process a waiver, pursuant to Section 30624.7 of the Coastal Act, if the Executive Director determines that the development involves no potential for any adverse effect, either individually or cumulatively, on coastal resources and that it will be consistent with the policies of Chapter 3 of the Coastal Act. All waivers issued by the Executive Director must be reported to the Commission for approval.

During the public comment and deputy director's report items at the March, 2014 Commission hearing, members of the public expressed concern regarding community character and rapid new residential construction in Venice. Specific concerns raised by members of the public included: 1) the lack of policies to ensure consistent community character; 2) the preservation of historic homes; 3) the preservation of low-cost housing; and 4) the lack of local public participation during the approval process for projects for which De Minimis Waivers are issued.

The subject application originally requested a De Minimis Waiver, which was objected to by the requisite number of Commissioners at the March, 2014 Commission hearing and subsequently scheduled as a regular calendar item at this hearing.

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### APPENDICES

Appendix A – Substantive File Documents

### EXHIBITS

Exhibit 1 – Vicinity Map

Exhibit 2 – Building Mass and Scale Design Sheet

Exhibit 3 – Photo of Existing Structures

Exhibit 4 – Mello Act Determination

## I. MOTION AND RESOLUTION

### Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 5-14-0124 subject to the conditions set forth in the staff recommendation.*

Staff recommends a **YES** vote of the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

### Resolution:

*The Commission hereby approves Coastal Development Permit 5-14-0124 for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not 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 complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been 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 will substantially lessen any significant adverse impacts of the development on the environment.*

## II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

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 Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. 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 Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission 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 Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

### III. SPECIAL CONDITIONS

None.

### IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

#### A. PROJECT LOCATION AND DESCRIPTION

The proposed development is demolition of a 1,316 sq. ft. duplex and construction of a 3,650 sq. ft. 30' high two-story single family residence, attached two-car garage, landscaping, swimming pool, and perimeter walls/fences. The subject parcel is sited on flat terrain one-half mile inland of the beach in a fully developed residential neighborhood in the Oakwood sub-area of Venice, in the City of Los Angeles (**Exhibit 1**).

The proposed development features a two car garage and an uncovered guest parking space on permeable pavers, accessible from the alley designated Alley #117, which conforms to the Commission's requirements. An existing curbcut on Vernon Avenue will be closed, creating additional on-street parking. The applicant will also install three new street trees and landscape the city right-of-way fronting the property.

The property features scuppers and downspouts to direct water to filtration planters, rain barrels, an infiltration garden, and permeable gravel. All proposed landscaping features native or non-native drought tolerant non-invasive plant species. The swimming pool will not direct water to the public storm drain system. The flat roof features solar panels.

The proposed project has received approval from the City of Los Angeles Planning Department (Case # DIR 2014-0109-VSO-MEL) and is consistent with the R1.5-1 (Low-Medium Multi-Family) zoning designation and surrounding land uses. The proposed 30' structure conforms to the Venice Specific Plan 30' height limit for varied rooflines in the Oakwood/Milwood/SE Venice subarea. The street-fronting portion of the roof is 25' high. No roof access structures or roofdecks are proposed. The footprint of the structure is 24% less than allowable under the City of Los Angeles Zoning Code and the Venice Specific Plan (**Exhibit 2**).

#### B. COMMUNITY CHARACTER

Venice has a wide range of scale and style of residential buildings throughout its various neighborhoods. Venice's historical character, diverse population, as well as its expansive recreation area, Ocean Front Walk (boardwalk), and wide, sandy beach make it a popular

destination not only for Southern California but also for national and international tourists. Accordingly, Venice has engendered a status as one of the more unique coastal communities in the State, and therefore, a coastal resource to be protected.

The Coastal Act requires that special communities be protected from negative impacts such as excessive building heights and bulks. In particular, Section 30253(e) of the Coastal Act states:

*New development shall where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

Section 30251 of the Coastal Act states:

*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 on 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 following sections of the certified Venice Land Use Plan address historical preservation and character preservation:

Policy I. A. 2. Preserve Stable Single Family Residential Neighborhoods:

*Ensure that the character and scale of existing single family neighborhoods is maintained and allow for infill development provided that it is compatible with and maintains the density, character and scale of the existing development.*

Policy I. E. 1. General:

*Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act.*

Policy I. E. 2. Scale:

*New development within the Venice Coastal Zone shall respect the scale and character of the community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods...*

Policy I. E. 3. Architecture:

*Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.*

Policy I. E. 4. Redevelopment:

*Projects involving large-scale land acquisition and clearance shall be discouraged in favor of rehabilitation, restoration, and conservation projects, especially those involving single family dwellings.*

Policy I. F. 2. Reuse and Renovation of Historic Structures:

*Wherever possible, the adaptive reuse and renovation of existing historic structures shall be encouraged so as to preserve the harmony and integrity of historic buildings identified in this LUP. This means:*

- a) Renovating building façades to reflect their historic character as closely as possible and discouraging alterations to create an appearance inconsistent with the actual character of the buildings.*
- b) Protecting rather than demolishing historic or culturally significant properties by finding compatible uses which may be housed in them that require a minimum alteration to the historic character of the structure and its environment.*
- c) Rehabilitation shall not destroy the distinguishing feature or character of the property and its environment and removal or alteration of historical architectural features shall be minimized.*
- d) The existing character of building/house spaces and setbacks shall be maintained.*
- e) The existing height, bulk and massing which serves as an important characteristic of the resource shall be retained.*

These policies encourage “architectural diversity” in Venice and encourage the preservation of historic structures; however individual homes not defined as “historic” and labeled as such in the LUP are not protected from demolition and new development. The above LUP policies have not been defined in an implementation plan and certified by the Commission in the form of an LCP nor has the City of defined a specific architectural style for the various neighborhoods of Venice. The determination that the character of a proposed project is in conformance with the above policies is subjective.

Ultimately, the extent to which the history of such demolition/rebuild/remodel has altered the community, community character of Venice remains difficult to determine. In order for such a determination to be made, a comprehensive cumulative assessment would likely be required. And, while there is little doubt that a significant amount of redevelopment has occurred within the coastal zone of Venice, it will be difficult to ensure that Venice’s character is protected until Venice’s community character has been defined. Such a definition, as well as a means to adequately protect such character consistent with the Act, is best determined through first a

community effort and then through the Coastal Commission review process as part of the certified LCP. The City of Los Angeles was recently awarded a grant to assist in developing a Local Coastal Program, however, no date for a deliverable has been determined. Staff conducted a site visit of the subject parcel on March 14, 2014. The existing structures had not been demolished, appeared to be vacant, and did not display historically or architecturally significant characteristics (**Exhibit 3**). The surrounding neighborhood is built out and comprised primarily of one-story, two-story, and three-story single family residences and duplexes of widely varying architectural styles. Several craftsman-style homes exist on the block, as do post-modern residences, bungalows, and town homes (**Exhibit 1**).

The applicant's representative conducted a thorough analysis of every parcel on both sides of the subject block. Of the 18 parcels, nine are single-story, six are two-story, and three are three-story. Nine have fewer than 3,000 sq. ft. of building area and nine have greater than 3,000 sq. ft. The largest single family residence is 3,767 sq. ft. and there is a 7,600 sq. ft. building divided into four town homes (**Exhibit 2**). The proposed new residence is two stories and 3,650 sq. ft., which would be in the middle of the spectrum for size, scale, and bulk on the subject block.

The preservation of low-cost housing in the coastal zone was included in early versions of the Coastal Act; however, this criteria was removed by the State Legislature. Accordingly, the Commission no longer reviews the impact of proposed development projects on low-cost housing in the coastal zone. As stated in Policy I. A. 9. of the Venice LUP (pages 2-27), pursuant to Section 65590 of the State Government Code, otherwise known as the Mello Act, "the conversion or demolition of existing residential units occupied by persons and families of low or moderate income shall not be permitted unless provisions have been made for replacement of those dwelling units which result in no net loss of affordable housing in the Venice Community..." The City of Los Angeles issued a Mello Act determination finding that the proposed development is not subject to the Mello Act and does not require a Mello Act Compliance Review (**Exhibit 4**). The applicant states that the duplex has been vacant for at least the past three years and therefore no residents will be displaced by the proposed development.

Therefore, the proposed project adequately protects the scenic and visual qualities of the Venice area and is consistent with Sections 30251(e) and 30253 of the Coastal Act.

## C. DEVELOPMENT

Section 30250(a) of the Coastal Act states:

*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.*

Section 30251 of the Coastal Act states:

*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.*

The proposed development is located within a developed neighborhood, is designed to be compatible with the scale, and mass of the surrounding area, and has been designed to ensure structural integrity. The proposed development is sited one-half mile from the coast and therefore has no negative visual effects on coastal resources. Therefore, the Commission finds that the development, as proposed conforms with Sections 30222, 30250, and 30251 of the Coastal Act.

#### **D. PUBLIC ACCESS**

Section 30210 of the Coastal Act states:

*In carrying out the requirement of Section 4 of Article X of the California Constitution, 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, rights of private property owners, and natural resource areas from overuse.*

Section 30211 of the Coastal Act states:

*Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

Section 30252(4) of the Coastal Act states:

*The location and amount of new development should maintain and enhance public access to the coast by ... (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation.*

The proposed development is not located between the first public road and the sea. Three parking spaces will be accessed from the alley at the rear of the parcel. The development will close an

existing curbcut along Vernon Avenue, enhancing public parking and access on the block. The proposed development will not have any adverse impacts on public access to the coast or to nearby recreational facilities and therefore, conforms with Sections 30210, 30211, and 30252(4) of the Coastal Act.

## **E. WATER QUALITY**

Section 30231 of the Coastal Act states:

*The biological productivity and the quality of coastal waters, streams, wetlands, 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 property features scuppers and downspouts to direct water to filtration planters, rain barrels, an infiltration garden, and permeable gravel. All proposed landscaping features native or non-native drought tolerant non-invasive plant species. The application includes best management practices to address water quality during construction and post-construction and is therefore consistent with Section 30231 of the Coastal Act.

## **F. LOCAL COASTAL PROGRAM**

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal development permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act:

*Prior to certification of the Local Coastal Program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200). A denial of a Coastal Development Permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.*

The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The Los Angeles City Council adopted a proposed Land Use Plan (LUP) for Venice on

October 29, 1999. On November 29, 1999, the City submitted the draft Venice LUP for Commission certification. On November 14, 2000, the Commission approved the City of Los Angeles Land Use Plan (LUP) for Venice with suggested modifications. On March 28, 2001, the Los Angeles City Council accepted the Commission's suggested modifications and adopted the Venice LUP as it was approved by the Commission on November 14, 2000. The Venice LUP was officially certified by the Commission on June 14, 2001.

The proposed project, as conditioned, conforms with the certified Venice LUP. The proposed project, as conditioned, is also consistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City's ability to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

## **G. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Section 13096 of the Commission's regulations requires Commission approval of Coastal Development Permit applications 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.

As proposed, there are no feasible alternatives or additional feasible mitigation measures available that would substantially lessen any significant adverse effect that the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

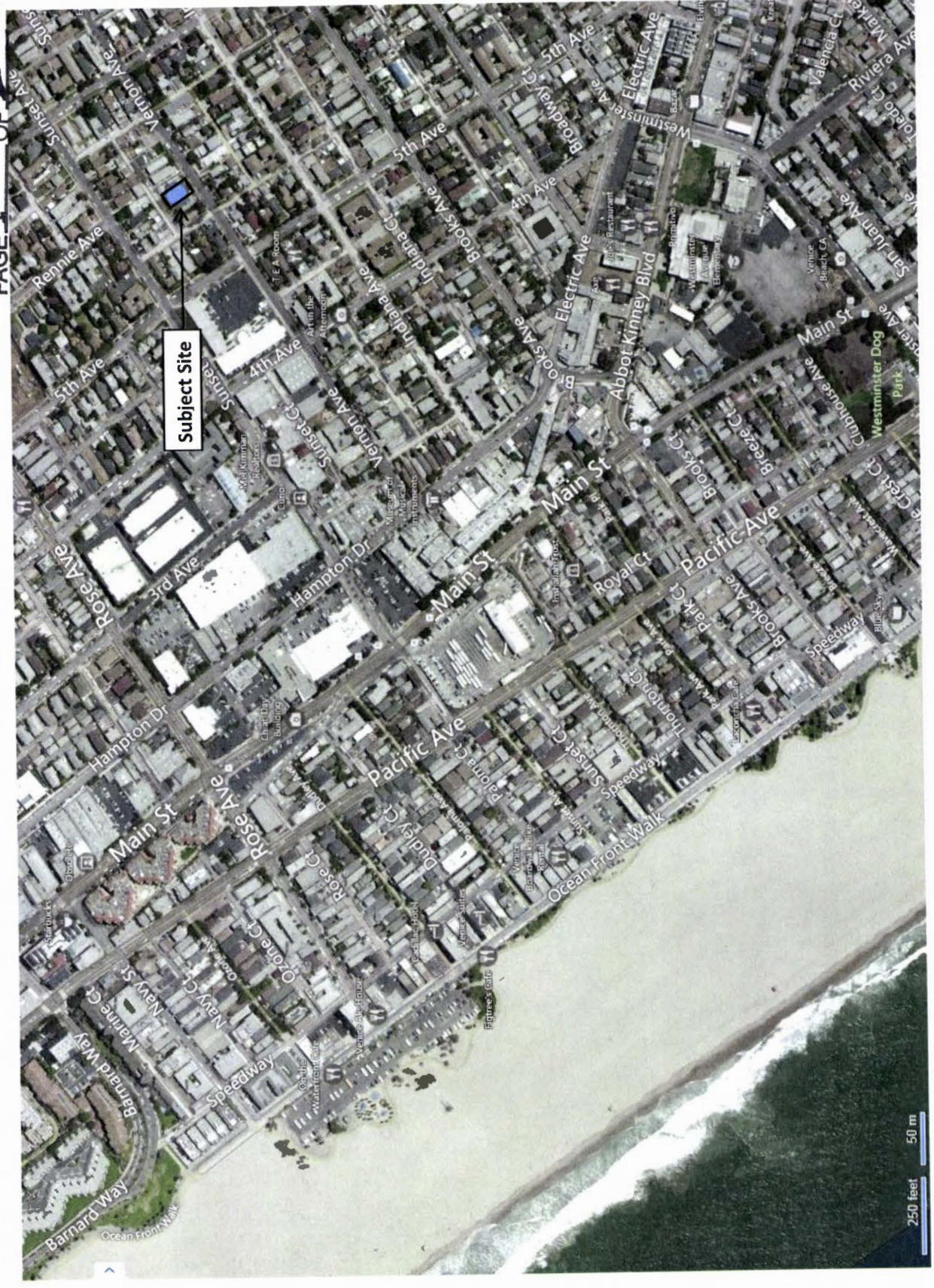
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## **Appendix A – Substantive File Documents**

1. Venice Land Use Plan (Commission Certified November 14, 2000)

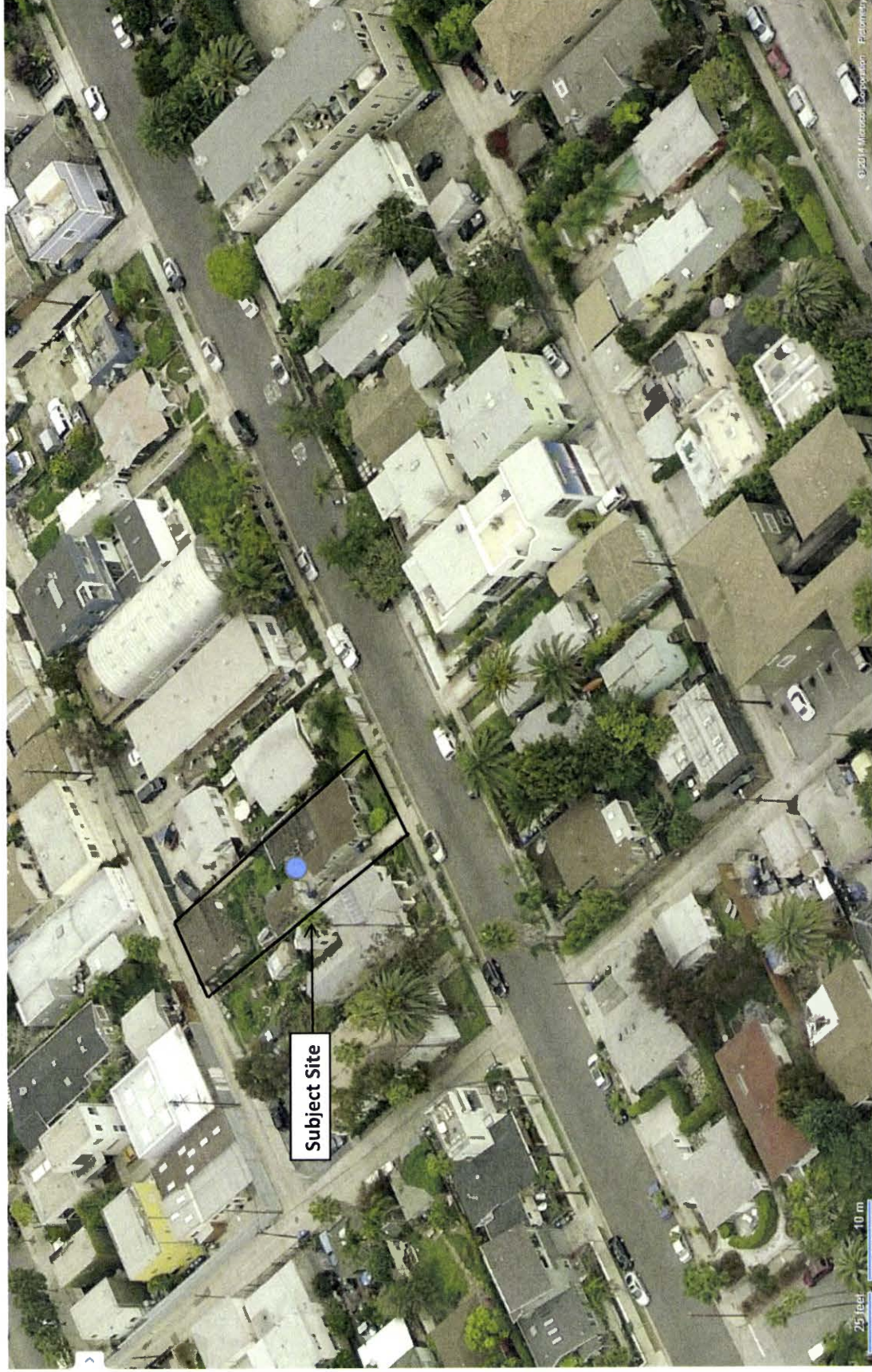


Vicinity Map: 521 Vernon Ave, Venice, Los Angeles





Vicinity Map: 521 Vernon Ave, Venice, Los Angeles



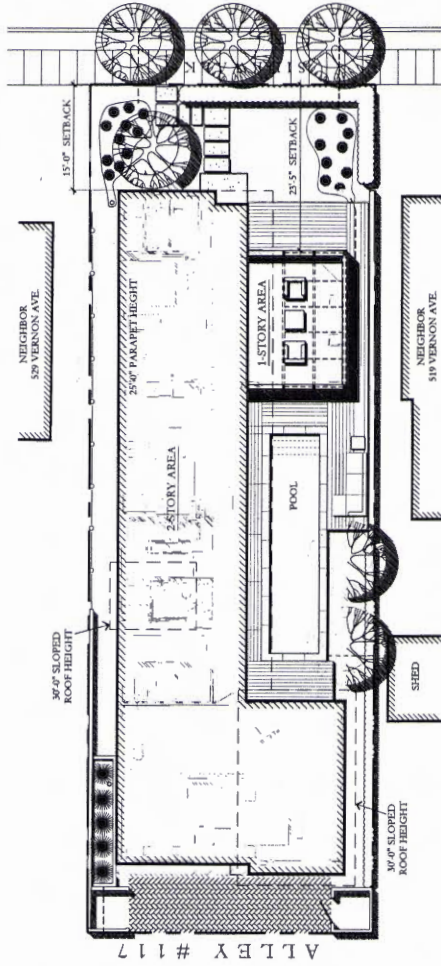
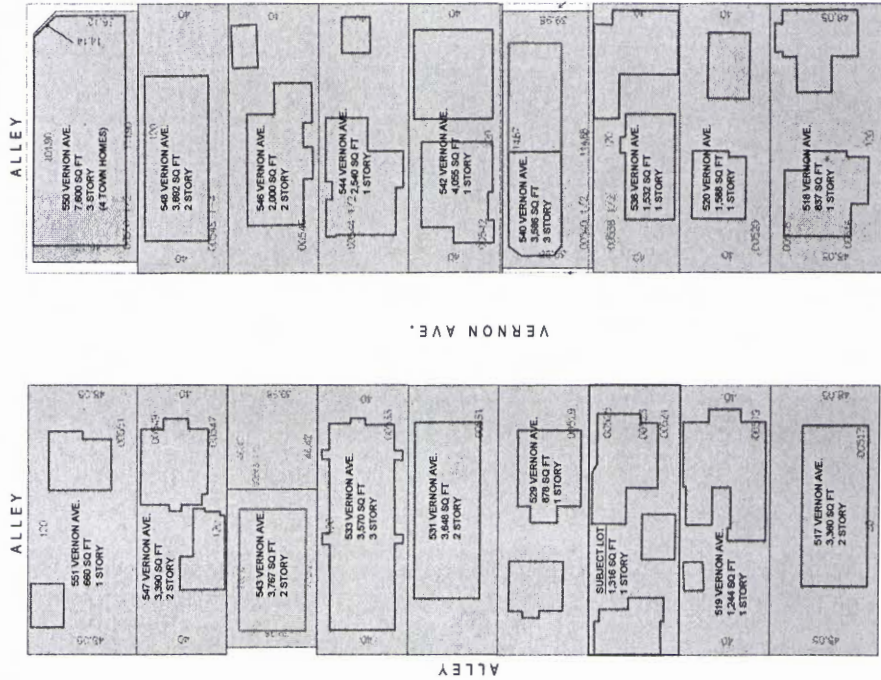


NEIGHBORHOOD BUILDING AREAS*	
SOURCE: L.A. ASSESSOR	
< 1,500 SQ FT	6 PARCELS
1,500 - 3,000 SQ FT	3 PARCELS
> 3,000 SQ FT	9 PARCELS

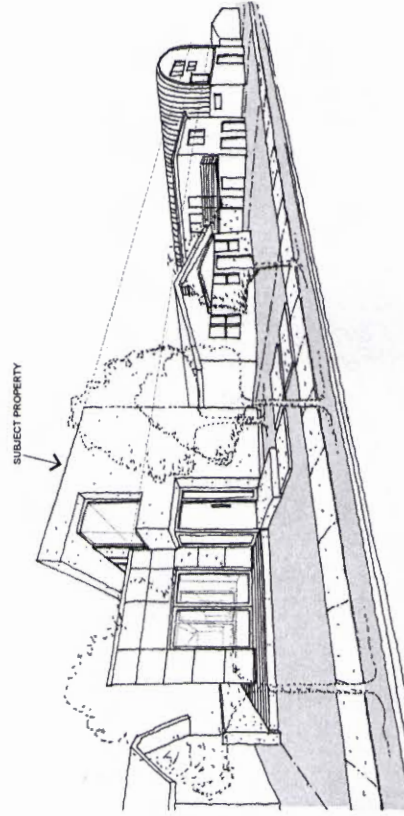
AVERAGE 2,737 SQ FT  
77TH PERCENTILE 3,652 SQ FT

NEIGHBORHOOD STORY HEIGHTS	
1 STORY:	9 PARCELS
2 STORIES:	6 PARCELS
3 STORIES:	3 PARCELS

3 Neighborhood Height & Area Tables



2 Plan View: Proposed Stories & Front Setback  
1/8" = 1'-0"



1 Neighborhood Perspective: Proposed Front Yard

4 Neighborhood Data

CRIMMINS DESIGN  
David Crimmins  
www.crimmins-design.com  
(415) 378-8585  
dcrimm@crimmins.com  
San Francisco, CA, 94109

521 VERNON AVENUE  
VERNE, CA  
O W N E R : 521 VERNON, LLC  
MATT CHABBS, MANAGING PARTNER  
(310) 864-9034, mattchabbs@gmail.com  
233 MAIN ST., EL SEQUOIO, CA, 90245

Date: 01/20/14  
Drawn By: J. Crimmins  
Project No: 200-01-001-14  
Scale: 1/8" = 1'-0"

BUILDING  
MASS & SCALE

SCALE: 1/8" = 1'-0"

A1.1



COASTAL COMMISSION

5-14-0124

EXHIBIT # 3

PAGE 1 OF 1

Existing vacant structure  
521 Vernon Ave, Venice





Date: December 31, 2013

To: Greg Shoop, City Planner  
City Planning Department

From: Robert Manford, Environmental Affairs Officer *RM*  
Los Angeles Housing and Community Investment Department

Subject: Mello Act Determination for  
521-525 Vernon Ave, Venice, CA 90291

**COASTAL COMMISSION**

5-14-0124

EXHIBIT # 4  
PAGE 1 OF 1

Based on information provided by the owner, 521 Vernon Ave. LLC, a California limited liability company, the Los Angeles Housing and Community Investment Department (HCIDLA) has determined that no affordable units exist at 521-525 Vernon Ave Venice, CA 90291.

The property consists of a duplex dwelling comprised of a two (2) bedroom and one (1) bedroom. Per the statement provided by the owner, they will demolish the existing duplex and construct a single-family dwelling. 521 Vernon Ave. LLC purchased the property on October 23, 2013 and has not applied for a Building Permit.

Section 4.4.3 of the Interim Administrative Procedures for Complying with the Mello Act requires that HCIDLA collect monthly housing cost data for at least the previous three years. The owner's Mello application statement was received by HCIDLA on November 21, 2013. HCIDLA must collect data from: November, 2010 through November, 2013.

Per the owner, the duplex dwelling has been vacant for the past three (3) years. Therefore, Section 4.4.3 of the Interim Administrative Procedures for Complying with the Mello Act is not applicable. HCIDLA's CRIS and BIMS database reflect RSO and SCEP exemptions applied on the property for the past three (3) years due to the vacancy and/or non-rental status. The owner filed a Notice of Intent to Withdraw Units from Rental Housing which was received and filed by HCIDLA on December 3, 2013. Additionally, the previous owner's LADWP utility bill for the past twelve months reflected both units as non-rentals.

Though the owner has not submitted proof of the rental/occupancy for the entire period required, the Notice of Intent to Withdraw Units from Rental Housing form, exemption status on CRIS/BIMS database and low utility bills indicate both units are non-rentals.

cc: Los Angeles Housing and Community Investment Department File  
521 Vernon Ave. LLC, a California limited liability company, Owner  
Richard A. Rothschild, Western Center on Law and Poverty, Inc.  
Susanne Browne, Legal Aid Foundation of L.A.

RM:MAC:rl

**RECEIVED**  
South Coast Region

MAY 9 2014

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