

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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# F10h

Filed: 04/02/14  
180th Day: 09/29/14  
Staff: A. Dobson-LB  
Staff Report: 5/22/14  
Hearing Date: 6/13/14

## STAFF REPORT: REGULAR CALENDAR

**Application No.:** 5-14-0237

**Applicant:** AK Lofts 1, LLC

**Project Location:** 520 Broadway St., Venice, City of Los Angeles, CA  
(Los Angeles County)

**Project Description:** Demolish three existing detached 1-story single family residences and construct a 3-story, 30 foot high, 6,747 sq. ft. duplex with roof decks and attached 4 car garage plus 1 uncovered parking space on a 4,800 sq. ft. level lot.

**Staff Recommendation:** Approval with standard conditions

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### SUMMARY OF STAFF RECOMMENDATION

AK Lofts 1, LLC proposes in this coastal development permit application #5-14-0237, the demolition of three existing detached 1-story single family residences and construction of a 3-story, 30 foot high, 6,747 sq. ft. duplex with roof decks and attached 4 car garage on a 4,800 sq. ft. level lot. Major issues before the Commission are related to community character, possible historic structures, and public concern regarding new construction in Venice.

The proposed project has received approval from the City of Los Angeles Planning Department (case #DIR 2013-3887-VSO-MEL) and is consistent with the RD1.5 zoning designation (Low-Medium II multi-family) and surrounding land uses of the Oakwood/Milwood area of Venice. The proposed project exceeds the Commission's parking requirement of 2 spaces per residential unit at 5 spaces total (4 covered, tandem).

Staff is recommending **approval** of the coastal development permit with standard conditions relating to permit compliance. The development proposal is consistent with the resource protection policies of the Coastal Act. The applicant agrees with the staff recommendation.

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. Projects that qualified as an administrative coastal development permit, the Executive Director has the discretion to process the development as a waiver, pursuant to Section 30624.7 of the Coastal Act, if the Executive Director determined 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 March 2014 Commission hearing, public comments made regarding the issuance of De Minimis Waivers for demolition and construction of single family homes in the City of Los Angeles, particularly in Venice, lead to the Commission's decision to remove four De Minimis Waivers from the agenda and place them on the Regular Calendar agenda in near-future hearings. Public concerns from Venice residents expressed during the March hearing 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 issued De Minimis Waivers by the Commission. These issues relate to the proposed project. Most of these issues can and should be addressed through the establishment of a Local Coastal Program (LCP) for the City of Los Angeles. The public comments also alleged that some applicants do not wait for the Coastal Commission's issuance of Waiver Effectiveness or Permits before beginning demolition of the existing structures.

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### APPENDICES

Appendix A: Substantive Files List

### EXHIBITS

- Exhibit 1 – Area Map
- Exhibit 2 – Site Plan
- Exhibit 3 – Existing home
- Exhibit 4 – Existing neighborhood
- Exhibit 5 – proposed elevations
- Exhibit 6 – Mello determination

## I. MOTION AND RESOLUTION

### **Motion:**

*I move that the Commission **approve** Coastal Development Permit No. 5-14-0237 pursuant to the staff recommendation.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned 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 5-14-0237 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:

#### A. PROJECT DESCRIPTION, LOCATION, AND BACKGROUND

The applicant proposes to construct a 3-story, 30 foot high, 6,747 sq. ft. duplex with roof decks and attached 4 car garage plus 1 uncovered parking space on a 4,800 sq. ft. level lot in the City of Los Angeles, CA in the Venice community. The project site is in the Oakwood/Milwood area of Venice (see Exhibit 1). The subject site is located inland of Abbot Kinney Blvd., is not near the Venice Canals, and is not between the first public road (Pacific Ave.) and the sea.

The development conforms with the density limits for the site (duplex) and the height limits (30 feet or less) for structures in the Oakwood/Milwood area of Venice (see Appendix A). The driveway, parking space, and garage will be accessed from the alley at the rear of the site with no additional curb cuts and will not remove additional public parking along the street. The proposed project incorporates best management practices (BMPs) during construction to address water quality, and post-construction by filtering water onsite using downspouts and filtration planter boxes and by minimizing impervious surfaces on the project site.

#### B. COMMUNITY CHARACTER

Due to Venice's unique blend of style and scale of residential buildings, historical character, walk streets, diverse population, as well as its expansive recreation area, such as the boardwalk and canals, Venice is not only a popular destination for Southern California area residents, 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. As a primarily residential community, the residential development is a significant factor in determining Venice's community character. The continued change in the residential character of the Venice Community has been a cause of public concern over the years.

The Coastal Act requires that special communities be protected from negative impacts such as excessive building heights and bulks. In particular, Sections 30253(e) and 30251 of the Act state, respectively:

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

*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 City of Los Angeles has the ability to issue Coastal Development Permits (CDP) in the coastal zone, however they cannot issue waivers of permits for development. Through the local CDP process, the City of Los Angeles is able to address the public participation component of development projects, such as this one, by issuing public notices, holding public hearings and public comment periods for all such development projects in the City of Los Angeles. The Commission also has the ability to issue CDPs for certain development in Venice and pursuant to section 30624.7, the Executive Director has the authority to issues waivers of CDPs.

Historically, Commission staff has processed applications for CDPs in Venice and the Commission has approved De Minimis Waivers for many projects on the basis that such residential demolition, remodel, addition, or new construction proposals were, in part, consistent with Venice's diverse community character. Recommendations for approval were based on Commission staff's best professional judgment and took into account the applicable sections of both the Coastal Act and the Venice Land Use Plan (LUP).

The following sections of the Venice LUP address historical preservation and character preservation (Appendix A):

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.*

E. Preservation of Venice as a Special Coastal Community

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 policies have not been defined in an implementation plan and certified by the Commission in the form of an LCP nor has the City, through public input, defined a specific desired 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 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 subsequently through a 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 LCP, however a date for deliverables has yet to be determined.

For the proposed development at 520 Broadway St. in Venice, the surrounding neighborhood is comprised of a variety of old and new multi-unit residential structures and single-family residences that vary in height between twenty and fifty feet and vary in size and architectural style (see **Exhibit 4**). The majority of homes are 1 and 2 stories, with some 3 story structures. Other than the height and scale of the structure, it is difficult to define the style of the community. Architectural features of existing nearby homes include a mix of Craftsman bungalows and traditional Victorians, next door to Modern and Contemporary style homes. The proposed duplex can generally be described as contemporary (see **Exhibit 5**). Inconsistencies in existing architectural style aside, the proposed development is consistent with the community character in size and scale of existing development. Past projects similar to the proposed development, or in excess of current proposal, in the general vicinity of the project site approved by the Commission include:

5-11-200-W, 701 Broadway St., Venice

Conversion of single-family residence into a two-story, 25-foot high (with two 34-foot high roof access structures) 3,084 square foot duplex with two two-car garages on the ground floor.

5-07-049-W, 546 Broadway St., Venice

Demolition of a one-story, four-unit apartment building and construction of a two-story, 28-foot high, 3,990 square foot duplex with a four-car garage and additional guest parking on the driveway.

5-90-495, 709 Broadway St., Venice

Construction of a Triplex, 2 story plus loft with garage space for 6 cars.

For this particular project, on a site visit on March 21, 2014, staff confirmed that demolition of the existing structure had not taken place. The existing home does not appear to be a historical structure and there have been no public comments or city determination that explicitly states this home is, or could be, of historical value, nor has it been defined as such in the LUP (see **Exhibit 3**).

The City of Los Angeles has consistently limited new development in the project area to a height of 25 feet (flat roof) or 30 feet (varied roofline) or 28 feet (along walk streets) measured above the fronting right-of-way. The proposed project conforms to the 30-foot height limit for varied rooflines. The only portion of the proposed structure that may exceed the height limit are chimneys, HVAC, etc. (Appendix A). Both the City and the Commission permit roof accessory structures (i.e. chimneys and open roof deck railings) to exceed the height limit by no more than 5 feet if the scenic and visual qualities of the area are not negatively impacted and no more than 10 feet for roof access structures. 2 roof access structures are included in this proposal, not to exceed 40 feet.

In addition, the preservation of low-cost housing in the coastal zone was included in early versions of the Coastal Act, however, this criteria was removed from the Coastal Act by the California 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 (see Appendix A, page 2-27), however, 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 . . .” Here, the City of Los Angeles issued a Mello Act determination that this project is not subject to the Mello Act and does not require a Mello Act Compliance Review because the existing units occupied for the past 3 years by renters were not considered affordable due to the cost of rent (**Exhibit 6**).

As stated, the proposed project is not designated as a historic structure, is within an area of diverse architectural style and is located approximately ½ mile away from the beach. As proposed, the project will not adversely impact and scenic or visual coastal resources. Therefore, the proposed project adequately protects the scenic and visual qualities of the Venice area and is consistent with Sections 30251 and 30253 of the Coastal Act. The proposed project is consistent with the policies of the certified Venice LUP, and previous Commission approvals, and approval of the project would not prejudice the City's ability to prepare a Local Coastal Program (LCP).

### **C. DEVELOPMENT**

Section 30250 of the Coastal Act states:

*(a) 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 development is located within an existing developed area and is designed to be compatible with the character (scale) of the surrounding area, and has been designed to ensure structural

integrity. The proposed development is 30 feet high and is consistent with the height of surrounding buildings in the area. The proposed development is located approximately 1/2 mile away from the beach in an established neighborhood and will have no adverse impact on public coastal views, coastal resources, nor coastal access. 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, is located approximately 1/2 mile away from the beach. Adequate parking will be provided onsite and will be accessed through the alley on the rear of the lot. The development will not create any new curb cuts and will not eliminate any public parking spaces on the streets. 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 proposed development has been designed to capture a percentage of storm water and direct water through gutters and downspouts to infiltration areas on site, specifically planter boxes. As proposed, the Commission finds that the proposed development conforms with Sections 30230 and 30231 of the Coastal Act regarding the protection of water quality to promote the biological productivity of coastal waters and to protect human health.

**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:

*(a) 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 conforms with the certified Venice LUP and is consistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the proposed development 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 (CEQA)**

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.

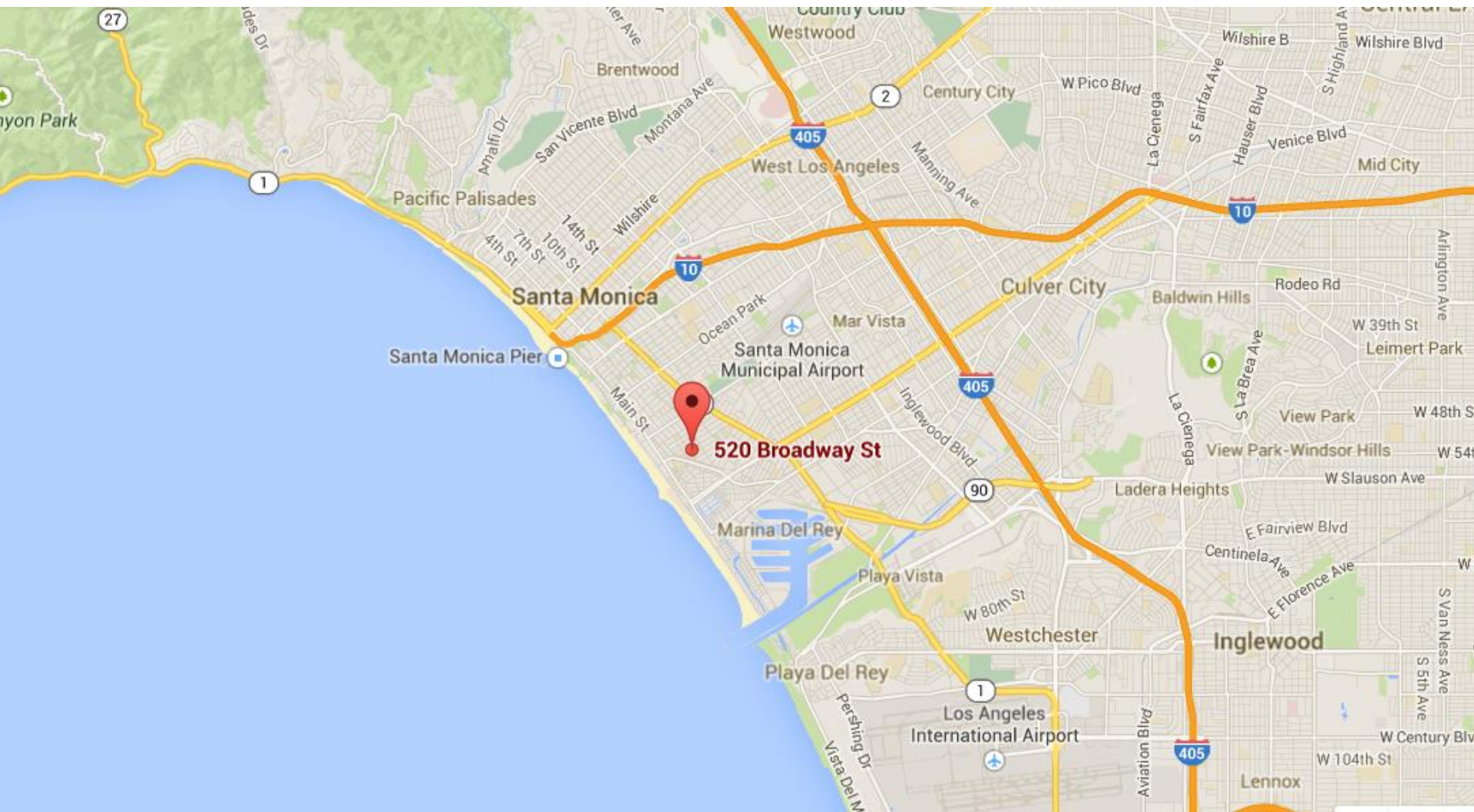
As proposed, there are no feasible alternatives or additional feasible mitigation measures available that would substantially lessen any significant adverse effect that the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging 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 Files:

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



<b>Exhibit 1</b>	
	California Coastal Commission

**PROJECT:**  
**520 BROADWAY**  
**VENICE**

**ARCHITECT:**  
**DU**

**DesignUniversal**  
 ARCHITECTURE AND DESIGN

ROBERT THIBODEAU  
 509 CALIFORNIA AVENUE  
 VENICE, CA 90291  
 Ph: 310.452.8161  
 Fx: 310.452.8171

**OWNER:**  
 LEWIS FUTTERMAN  
 44 W 106TH ST PENTHOUSE  
 NEW YORK, NY 10025  
 Ph: 917.566.6477

**CONTRACTOR:**

**SOILS ENGINEER:**

**SURVEYOR:**

**STRUCTURAL ENGINEER:**

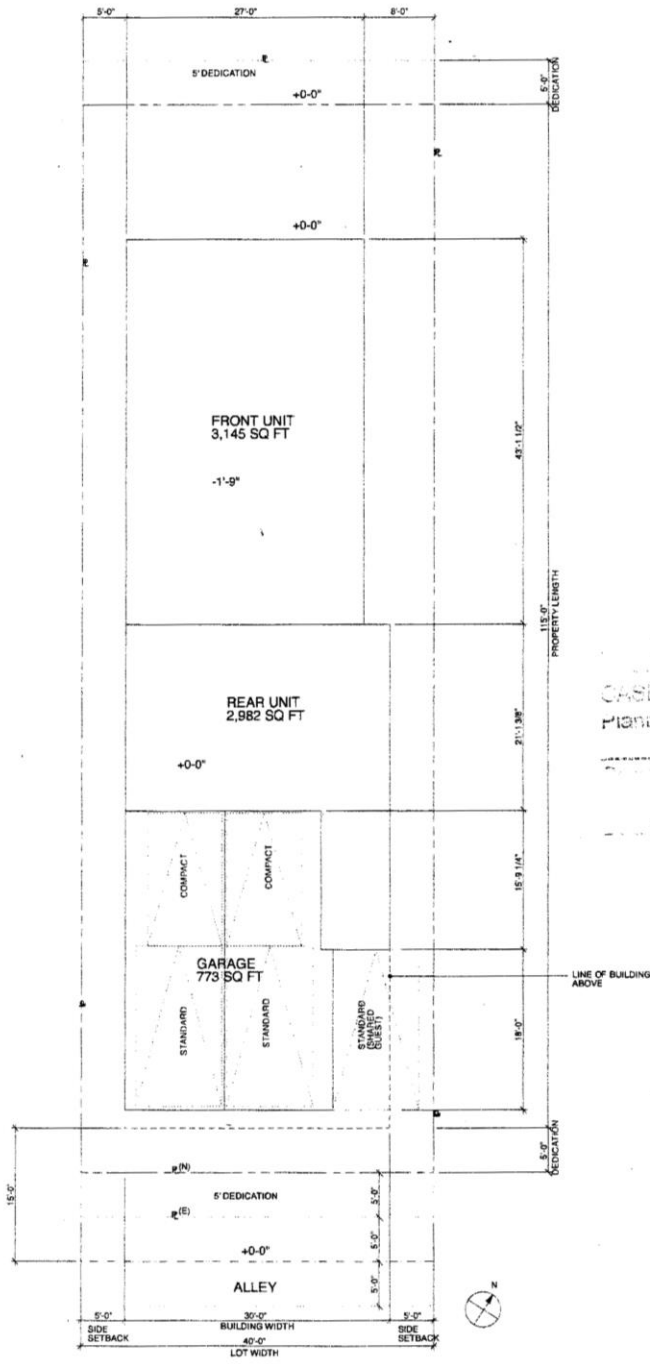
APPROVED BY  
 CASE NO. **2013-3887**  
 Planner *[Signature]*  
 Community Planning  
 12/6/13

REVISION / ISSUE	DATE
1. PRELIM DESIGN	8/1/2013
2. STRUCTURAL BIDS	10/4/2013
	11/25/2013

TITLE SHEET

DATE: 8/1/2013 DRAWN: MAA SCALE: AS NOTED

**A-0.0**



PLOT PLAN / SITE PLAN 1  
 1/16" = 1'-0"

**Exhibit 2**

California Coastal Commission



Front Existing Single Family Residence



Back Existing Single Family Residence

<b>Exhibit 3</b>	
	California Coastal Commission



**Existing Single Family Residence from side property**



**Immediately next door: parking lot and 3 story multi-family structure**

**Exhibit 4**



California Coastal  
Commission



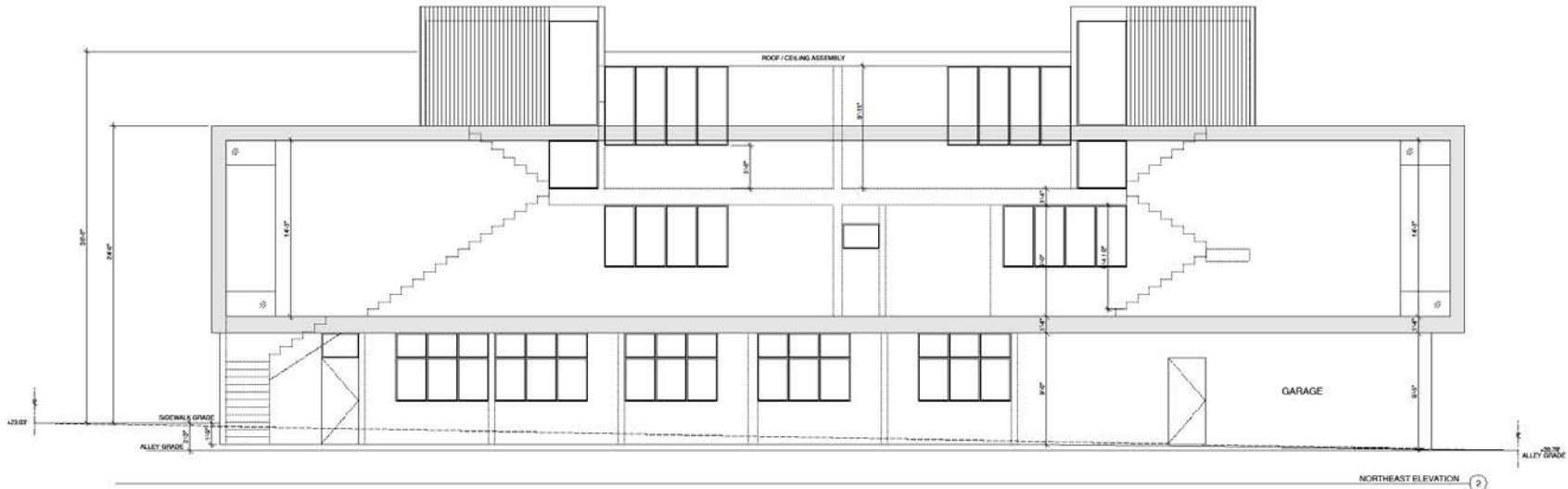


# Surrounding Homes

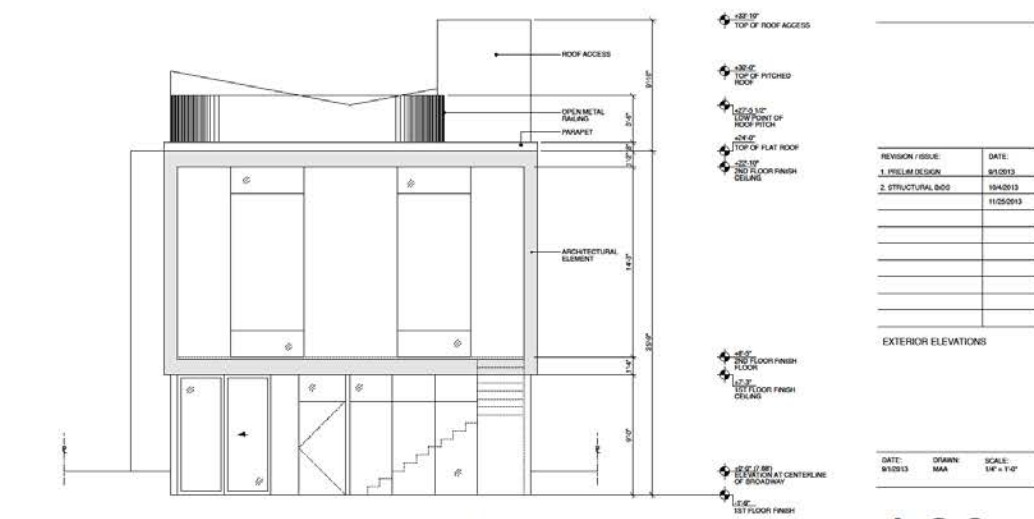
Exhibit 4



California Coastal Commission



NORTHEAST ELEVATION (2)



SOUTHEAST (FRONT) ELEVATION (1)

- 12'-0" TOP OF ROOF ACCESS
- 12'-0" TOP OF PITCHED ROOF
- METAL TOP POINT OF ROOF PITCH
- 4'-0" TOP OF FLAT ROOF
- 2'-0" TOP OF 2ND FLOOR FINISH DECK
- 2'-0" 2ND FLOOR FINISH FLOOR
- 1'-0" 1ST FLOOR FINISH CEILING
- 1'-0" (1'-0") AT CENTERLINE OF BROADWAY
- 1'-0" 1ST FLOOR FINISH

REVISION / ISSUE	DATE
1. ISSUE FOR DESIGN	01/09/13
2. STRUCTURAL BIDS	10/20/13
	11/25/13

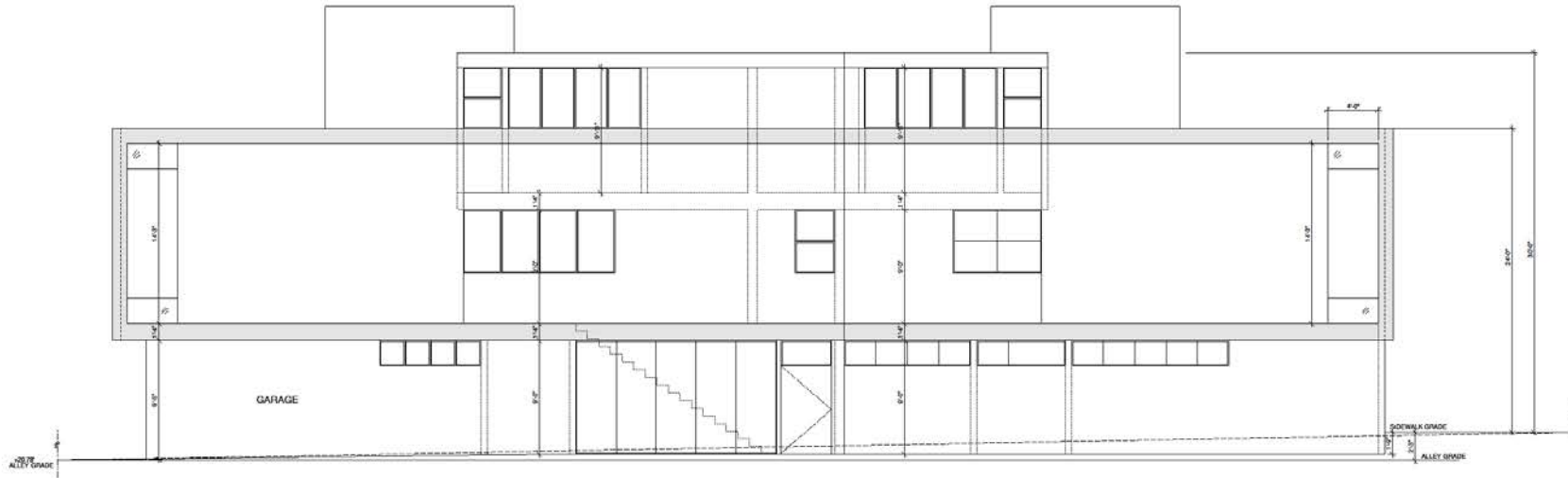
EXTERIOR ELEVATIONS

DATE:	DESIGN:	SCALE:
01/09/13	MAA	1/4" = 1'-0"

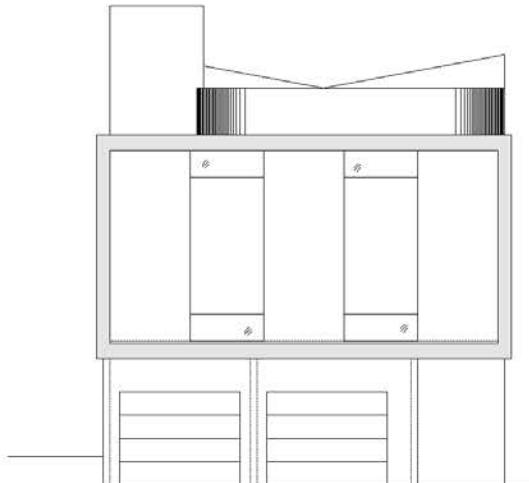
A 20

Exhibit 5

California Coastal  
Commission



SOUTHWEST ELEVATION ②



NORTHWEST (REAR) ELEVATION ①

ARCHITECT: **DU**

**DesignUniversal**  
 ARCHITECTURE AND DESIGN  
 ROBERT THIBODEAU  
 505 CALIFORNIA AVENUE  
 VENICE, CA 90291  
 PH: 310-402-2191  
 FX: 310-462-2171

DESIGN:  
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 44 W 80TH ST FROTHOUSE  
 NEW YORK, NY 10023  
 PH: 917-366-8477

CONTRACTOR:

SOILS ENGINEER:

SURVEYOR:

STRUCTURAL ENGINEER:

REVISION / ISSUE:	DATE:
1. PRELIM DESIGN	8/12/13
2. STRUCTURAL BIDS	10/4/2013
	11/25/2013

EXTERIOR ELEVATIONS

DATE:	DRAWN:	SCALE:
8/12/13	MAA	1/4" = 1'-0"

**A-2 1**

Exhibit 5

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California Coastal  
Commission



**RECEIVED**  
South Coast Region

JAN 28 2014



Eric Garcetti, Mayor  
Mercedes M. Márquez, General Manager

CALIFORNIA  
COASTAL COMMISSION

Date: November 19, 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  
520 Broadway Street, Venice, CA 90291

Based on information provided by the owner, A K Lofts 1, LLC, a California Limited Liability Company, the Los Angeles Housing and Community Investment Department (HCIDLA) has determined that no affordable units exist at 520 Broadway Street, Venice, CA 90291.

The property consists of a triplex dwelling with each unit comprised of one (1) bedroom. Per the statement provided by the owner, they will demolish the triplex dwelling and construct a duplex dwelling. A K Lofts 1, LLC purchased the property on October 2, 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 October 25, 2013. HCIDLA must collect data from: October, 2010 through October, 2013.

Per the owner, all three units have been tenant occupied for the last three years. Unit 520 was occupied from March 2012-September 2013 with an average housing cost of \$2,100 per month. Unit 520 1/2 has an average housing cost of \$1,895 per month with tenancy commencing on December 2010. Unit 520 #A has an average housing cost of \$1,800 per month with tenancy commencing on July 2008. HCIDLA sent the required 30-day letter to the tenants, however no forms were returned.

The tenant estoppel certificates and rental information provided show a pattern of housing cost that is above affordable for all three units.

cc: Los Angeles Housing and Community Investment Department File  
A K Lofts 1, 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

