

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
200 Oceangate, Suite 1000  
Long Beach, CA 90802-4302  
(562) 590-5071

**F10j**

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180th Day:	7/27/2014
Staff:	S. Vaughn-LB
Staff Report:	5/22/2014
Hearing Date:	6/13/2014

**STAFF REPORT: REGULAR CALENDAR**

**Application No.:** 5-14-0240

**Applicant:** AK Lofts 3, LLC

**Agent:** Howard Robinson

**Location:** 659 Broadway Street, Venice, City of Los Angeles  
(APN 4239-012-029)

**Project Description:** Demolition of an approximately 1,218 sq. ft. single-story, single-family residence and construction of a 5,974 sq. ft., 30' tall, three-story duplex with an attached 773 sq. ft. four-car garage and one additional on-site guest parking space on a 5,200 sq. ft. lot. The proposal also includes the construction of two roof decks.

**Staff Recommendation:** Approval with Standard Conditions

**SUMMARY OF STAFF RECOMMENDATION**

AK Lofts 3, LLC proposes in this coastal development permit application #5-14-0240, the demolition of single-story single family residences and construction of a 3-story, 30 foot high, 5,974 sq. ft. duplex with roof decks and attached 4 car garage and an additional guest parking space on a 5,200sq. 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 2013-3891-VSO-MEL) and is consistent with the Low-Medium multi-family zoning designation and surrounding land uses of the Oakwood/Milwood area of Venice. Adequate on-site parking is provided. The proposed project meets the Commission's parking requirement of 2 spaces per residential unit and 1 on-site guest parking space, totaling 5 on-site parking spaces.

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.

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## EXHIBITS

Exhibit 1 – Site Location

Exhibit 2 – Community Character Map

Exhibit 3 – Photographs of Site

Exhibit 4 – Mello Determination

## I. MOTION AND RESOLUTION

### Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 5-14-0240 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 a coastal development permit 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 would 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 of 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 LOCATION & DESCRIPTION**

The project site is located at 659 Broadway St., Venice, CA, over ½ a mile from the ocean (**EXHIBIT #1**) on an approximately 5,200 sq. ft. developed lot in an established Venice residential area in the City of Los Angeles. The proposed development has been approved by the City of Los Angeles Planning Department (Case #2013-3891-VSO-MEL) and is consistent with the RD1.5-1 zoning designation and surrounding land use. The applicant proposes to demolish an approximately 1,218 sq. ft. single-story, single-family residence and construct a 5,974 sq. ft., 30 ft. tall, three-story duplex with an attached 773 sq. ft. four-car garage with one additional on-site guest parking space and two roof-top decks. The development conforms with the density limits for the site and the height limits for structures in the Milwood area of Venice. The height limit for the proposed project is 30 ft. with an additional ten feet allotted for enclosed stairwells providing access to the roof, limited to 100 sq. ft. The garage and guest parking space will be accessed from Brooks Court 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 meets the Commission's parking requirement of two spaces per residential unit with 5 spaces total (4 in the garage and on-site covered guest parking space). The proposed project incorporates best management practices (BMPs) during construction to address water quality and post-construction by filtering water on-site using downspouts and filtration planter boxes and by minimizing impervious surfaces on the project site.

During the March 2014 Commission hearing, public comments were 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. This application was for a De Minimis Waiver in the Venice community, accepted before the March hearing. 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. 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.

#### **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, Sections 30253(e) and 30251 of the Act state:

**Section 30253(e).** 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.** 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 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 development in Venice, and has the authority to issue waivers of CDPs.

Historically, Commission staff has processed applications for Coastal Development Permits 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. Yet, these policies have not been regularly enforced by the City of Los Angeles, nor have they been defined in an implementation plan and certified by the Commission in the form of an LCP.

The following sections of the Venice LUP 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.

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 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.

In this case, on a site visit on March 14, 2014, staff confirmed that demolition of the existing structure had not taken place, despite statements to the contrary made at the March California Coastal Commission hearing.. The existing home does not appear to be a historical structure and

there have been no public comments that explicitly states this home is, or could be, of historical value (**EXHIBIT #3**).

For the proposed development at 659 Broadway St. in Venice, the surrounding neighborhood within 500 ft. is comprised of a variety of old and new multi-unit residential structures and single-family residences that vary in height between 20 and 50 ft. and vary in and architectural style (**EXHIBITS #2 & #3**). The majority of the homes are one or two stories with a few three-story structures. Other than the height and scale of the structure, it is difficult to define the style of the community. 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 in the vicinity approved by the Commission include:

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

Conversion of single-family residence into a two-story, 25 ft. high (with two 34 ft. high roof access structures) 3,084 sq. ft. 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 ft. high, 3,990 sq. ft. 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.

The surrounding neighborhood for this property is comprised of a variety of old and new multi-unit residential structures and single-family residences that vary in height between and vary in size of square footage and architectural style (**EXHIBIT #3**).

The City of Los Angeles has consistently limited new development in the project area to a height of 25 feet (flat roof) of 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 portions of the proposed structure that may exceed the 30 feet height limit are chimneys, HVAC, etc. 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. Two 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 (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 . . ." In this case, the owner of the property will also be one of the occupants. 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. **(EXHIBIT #4)**. 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.

**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 has no negative visual effects on coastal resources and does not impact 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 and will have no impact on public access to coastal resources. Parking (five spaces) 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 applicant proposes to incorporate Best Management Practices to address water quality during construction and post-construction by filtering water on-site using downspouts and filtration planter boxes and by minimizing impervious surfaces on the project site.

## **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.”*

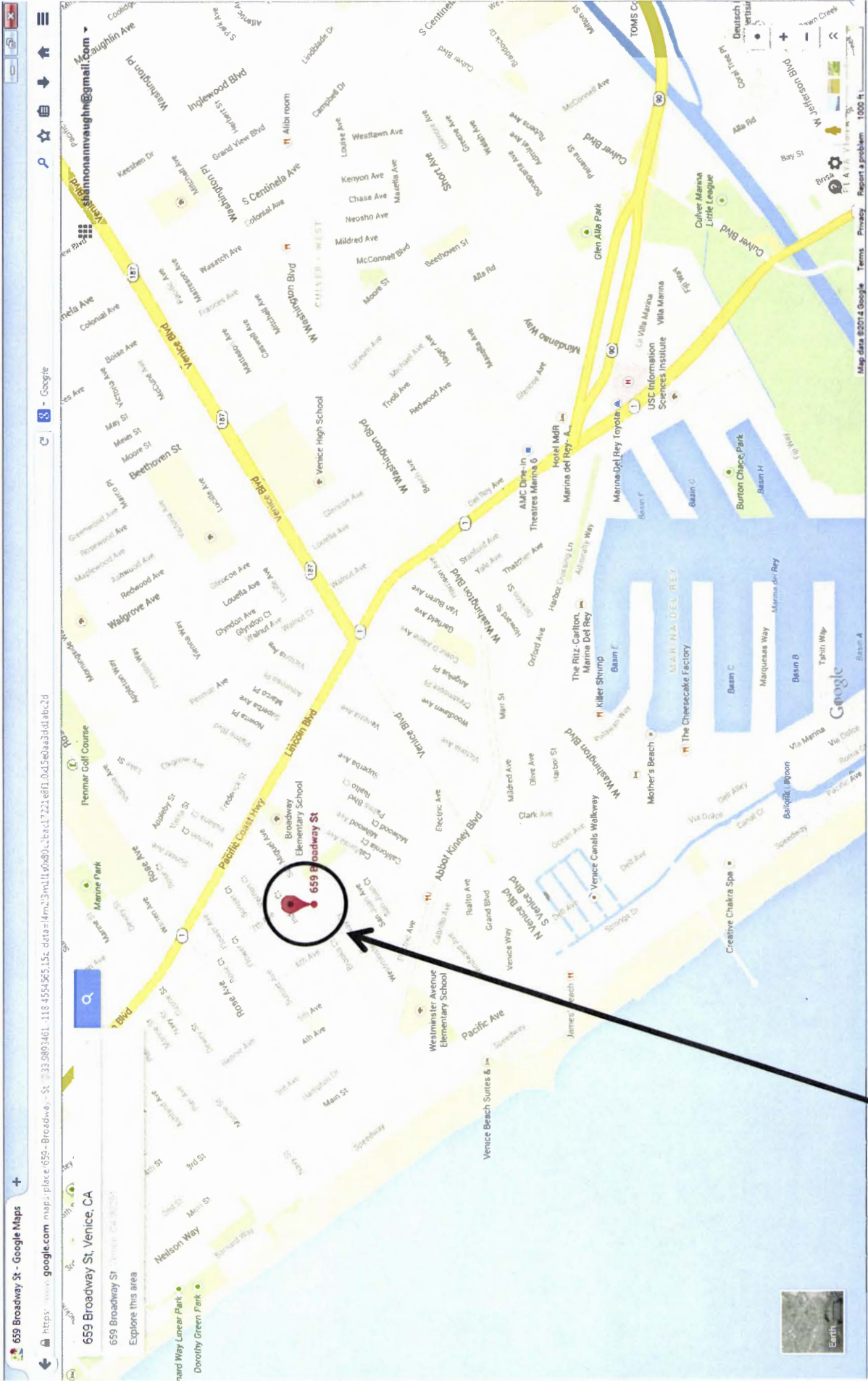
The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The Los Angeles City Council adopted a proposed Land Use Plan (LUP) for Venice on October 29, 1999. On November 29, 1999, the City submitted the draft Venice LUP for Commission certification. On November 14, 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 project, as proposed, 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 (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.



**Site Location**

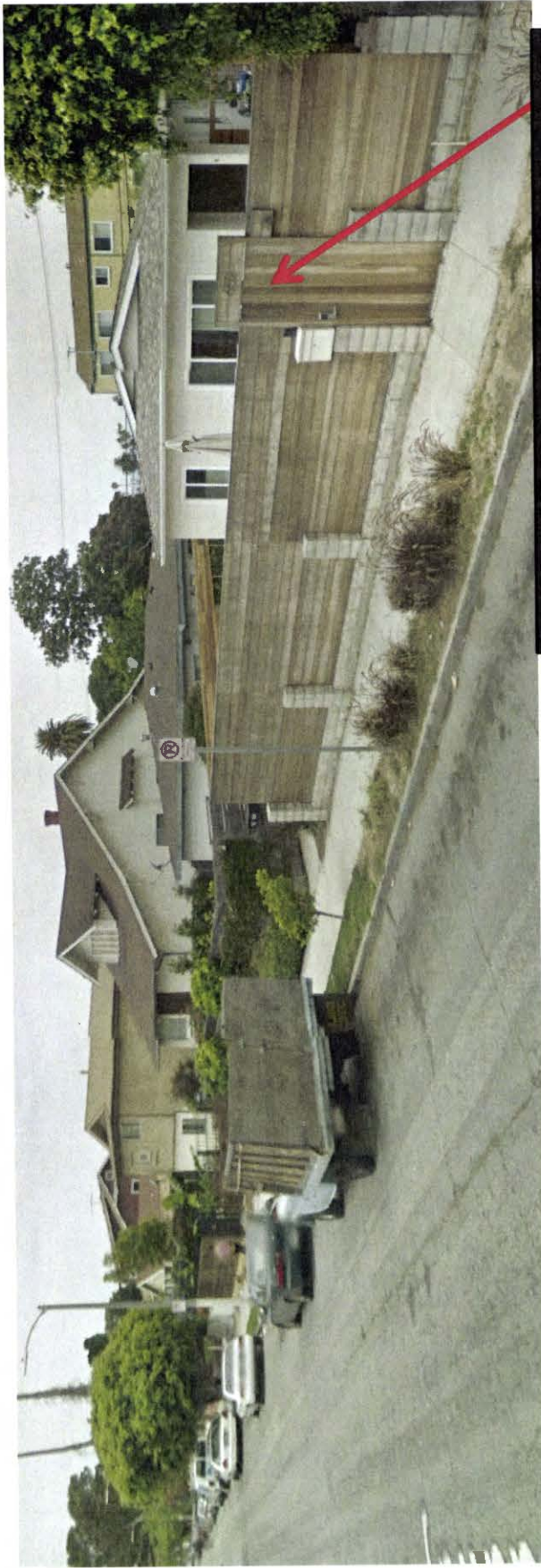
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659 Broadway St., Venice, CA



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**CITY OF LOS ANGELES  
PLANNING DEPARTMENT**

City Hall • 200 N. Spring Street, Room 621 • Los Angeles, CA 90012



**NEIGHBORHOOD PLAN IMPLEMENTATION DIVISION  
DIRECTOR OF PLANNING SIGN-OFF**

**Venice Coastal Specific Plan (Ordinance 175,693)**

<b>Case Number:</b>	DIR 2013-3891-VSO-MEL	<b>Date:</b>	December 6, 2013
<b>Applicant Name:</b>	Robert Thibodeau (r) (310) 452-8191 AK Lofts LLC (o)		
<b>Applicant Address:</b>	529 California Avenue		
	City: Venice	State: CA	Zip: 90291
<b>Project Location:</b>	<b>659 E Broadway Avenue</b>		
	<b>Zoning:</b> RD1.5-1	<b>Subarea:</b> Oakwood-Milwood-S/E Venice	
<b>Existing Use:</b>	Single Family Dwelling	<b>Proposed Use:</b>	Three-story Duplex with attached garage
<b>Project Description:</b>	Demolish the existing SFD and construct a new three-story duplex with an attached garage. Project will include two roof decks and two stair access structures. Five covered parking spaces are provided.		

A Specific Plan Project Permit Compliance is not required for the reasons below:

In the Dual Jurisdiction	
	An improvement to an existing single- or multiple-family structure that is not located on a Walk Street
In the Single Jurisdiction	
	An improvement to an existing single- or multiple-family structure that is not on a Walk Street
	New construction of one single-family unit, and not more than two condominium units, not Walk Street
XX	New construction of four or fewer rental units, not located on a Walk Street
XX	Demolition of four or fewer units <i>Mello Determination:</i> Per the Grant Deed and Utility Bills the SFD is an owner-occupied dwelling and therefore is categorically exempt from the State Mello Act. The duplex is a Small Housing Development (Less than 10 units) and therefore, exempt from inclusionary housing requirements.
Anywhere in the Coastal Zone	
	Any improvement to an existing commercial or industrial structure that increases the total occupant load, required parking or customer area by less than 10 percent (10%).
	Any Venice Coastal Development project that has been Categorically Excluded pursuant to a Categorical Exclusion order issued by the Coastal Commission.

This application has been reviewed by the staff of the Metro Plan Implementation Division, and the proposed project complies with the provisions of the Venice Coastal Specific Plan and all development requirements contained in Section 8.A, 9.C, 10.G, and 13.

<b>Oakwood-Milwood-Southeast Venice Subarea Development Regulations</b>			
SECTION	STANDARDS	REQUIRED	PROPOSED PROJECT
10.G.2	Density	max 2 dwelling units	Duplex
10.G.3	Height	Flat Roof - 25 feet; excluding roof deck railings 42" max & of an open design Varied Roofline - 30 feet Roof Access Structure	30 foot high varied roof Deck level cannot exceed 25 feet 75% open railing can exceed the 25 foot flat roof height Roof Access Structures cannot exceed 100 sqft. and 10 feet above the top of the roof.
10.G.4	Access	Alley	from alley,
13	Parking	MF - 2 spaces plus 1 guest pending width of lot	Five covered parking spaces

The proposed project shall comply with all other regulations of its subject zone and all other provisions of the L.A.M.C. This Director of Planning Sign-Off is based on the information provided by the applicant. If, at a later date, this information is found to be incorrect or incomplete, this sign-off will become invalid, and any development occurring at that time must cease until appropriate entitlements are obtained.

Gregory J. Shaop, City Planner

**COASTAL COMMISSION**

EXHIBIT # 4

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