

CALIFORNIA COASTAL COMMISSION

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Appeal Filed: 05/28/15
49th Day: 07/16/15
Staff: M. Alvarado-LB
Staff Report: 06/26/15
Hearing Date: 07/09/15

STAFF REPORT: APPEAL – SUBSTANTIAL ISSUE

Appeal Number: A-5-VEN-15-0036

Applicant: J. Edward Smith

Local Government: City of Los Angeles

Local Decision: Approval with Conditions

Appellants: Robin Rudisill, Gabriel Ruspini, Todd Darling, Mark Kleiman, Arnold Springer, Leigh Marling, Gray Marshall, Deborah Marshall

Project Location: 1620 Electric Avenue, Venice, City of Los Angeles, Los Angeles Co.

Project Description: Appeal of City of Los Angeles Local Coastal Development Permit (CDP No. ZA 2014-1550) for the demolition of a one-story single-family residence, and the construction of a three-story, 30-foot high, 4,044 square foot single-family residence with a basement, an attached 410 square foot garage, and a swimming pool.

Staff Recommendation: Determine that a substantial issue exists.

SUMMARY OF STAFF RECOMMENDATION

The staff recommends that the Commission, after public hearing, determine that a **substantial issue exists** with respect to the project's conformity to the community character policies of sections 30251 and 30253 of the Coastal Act. Pursuant to section 30625, the grounds of appeal are limited to whether or not a substantial issue exists as to conformity with Chapter 3 of the Coastal Act when there is an appeal pursuant to section 30602(a).

IMPORTANT NOTE: The Commission will not take testimony on this "substantial issue" recommendation unless at least three commissioners request it. The Commission may ask questions of the applicant, any aggrieved person, the Attorney General or the executive director prior to determining whether or not to take testimony regarding whether the appeal raises a substantial issue. If the Commission takes testimony regarding whether the appeal raises a substantial issue, testimony is generally and at the discretion of the Chair limited to 3 minutes total per side. Only the applicant, persons who opposed the application before the local government (or their representatives), and the local government shall be qualified to testify during this phase of the hearing. Others may submit comments in writing. If the Commission finds that the appeal raises a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

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EXHIBITS

- Exhibit 1 – Project Location
- Exhibit 2 – Vicinity Map
- Exhibit 3 – Milwood Subarea Maps
- Exhibit 4 – Project Rendering
- Exhibit 5 – Project Plans
- Exhibit 6 – Appeal
- Exhibit 7 – Local Coastal Development Permit
- Exhibit 8 – Pictures of Project Site and Surroundings along Electric Avenue
- Exhibit 9 – 1634 Electric Avenue, Venice: 2nd Unit

I. MOTION AND RESOLUTION - SUBSTANTIAL ISSUE

Motion: *I move that the Commission determine that Appeal No. A-5-VEN-15-0036 raises NO Substantial Issue with respect to the grounds on which the appeal has been filed under § 30602 of the Coastal Act.*

Staff recommends a **NO** vote. Failure of the motion will result in a de novo hearing on the application and adoption of the following resolution and finding. Passage of this motion will result in a finding of No Substantial Issue and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the Commissioners present.

Resolution:

*The Commission hereby finds that Appeal No. A-5-VEN-15-0036 presents a **SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under § 30602 of the Coastal Act regarding consistency with Chapter 3 policies of the Coastal Act.*

II. APPELLANTS' CONTENTIONS

On April 30, 2015, the Commission received a valid notice of final local action for Local Coastal Development Permit (CDP) No. ZA 2014-1550, which approved the demolition of a single-family dwelling and detached accessory structures, and the construction of an approximately 4,044 square foot, 30-foot high, three-story single-family dwelling (and basement) with a pool and an attached three-car garage at 1620 Electric Avenue, Milwood subarea of Venice in Los Angeles.

On May 28, 2015, within 20 working days of receipt of notice of final local decision, Robin Rudisill, Todd Darling, Gabriel Ruspini, et al., filed an appeal of the local CDP alleging that the proposed project violates the Chapter 3 policies of the Coastal Act and the standards of the Venice Land Use Plan (LUP). The appellants assert that the proposed project poses adverse impacts to the community character of Venice and compliance with CEQA (**Exhibit 6**). As such, the appellants contend that the City-approved development could prejudice the City's ability to prepare a Local Coastal Program (LCP). No other appeals were received prior to the end of the appeal period on May 29, 2015.

III. LOCAL GOVERNMENT ACTIONS

On May 2, 2014, the applicant submitted to the City of Los Angeles Planning Department a Master Land Use Permit Application for the proposed project. The application was assigned Case No. 2014-1550.

The project description of the Local CDP No. ZA 2014-1550 reads as follows:

“...the demolition of an existing single-family dwelling and detached accessory structures and the construction, use, and maintenance of a new single-family dwelling with attached three-car garage, on property located within the R2-1 Zone, and the Single Permit

Jurisdiction and Calvo Exclusion Area of the California Coastal Zone Commission
Authority Area of the California Coastal Zone”.

The City’s records state that on September 4, 2014, the City of Los Angeles Office of Zoning Administration (ZA) held a public hearing before the ZA Hearing Officer for Local Coastal Development Permit No. ZA 2014-1550. The hearing was attended by the applicant’s representative, the applicant, and concerned neighbors and residents of the Venice community. Public testimony was given at the hearing mostly in opposition to the project and with assertions that the project is not compatible with the character of the community.

On March 25, 2015, the Zoning Administrator approved with conditions the Local Coastal Development Permit for the demolition of a single-family dwelling and the construction of a new, larger single-family dwelling. The City issued the Director of Planning Sign-off (DIR 2014-1215-VSO-MEL) on April 9, 2014 for the proposed project’s conformance to the Venice Specific Plan and the CEQA Notice of Exemption (ENV-2014-1551-CE) on July 11, 2014.

IV. APPEAL PROCEDURES

Section 30600(b) of the Coastal Act provides that prior to certification of its Local Coastal Program (LCP), a local jurisdiction may, with respect to development within its area of jurisdiction in the coastal zone and consistent with the provisions of Sections 30604, 30620 and 30620.5, establish procedures for the filing, processing, review, modification, approval or denial of a coastal development permit. Pursuant to this provision, the City of Los Angeles developed a permit program in 1978 to exercise its option to issue local coastal development permits. Sections 13301-13325 of Title 14 of the California Code of Regulations provide procedures for issuance and appeals of locally issued coastal development permits. Section 30602 of the Coastal Act allows *any* action by a local government on a coastal development permit application evaluated under Section 30600(b) to be appealed to the Commission. The standard of review for such an appeal is the Chapter 3 policies of the Coastal Act. [Cal. Pub. Res. Code §§ 30200 and 30604.]

After a final local action on a local coastal development permit application, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice which contains all the required information, a twenty working-day appeal period begins during which any person, including the applicants, the Executive Director, or any two members of the Commission, may appeal the local decision to the Coastal Commission. [Cal. Pub. Res. Code § 30602.] As provided under section 13318 of Title 14 of the California Code of Regulations, the appellant must conform to the procedures for filing an appeal as required under section 13111 of Title 14 of the California Code of Regulations, including the specific grounds for appeal and a summary of the significant question raised by the appeal.

The action currently before the Commission is to find whether there is a “substantial issue” or “no substantial issue” raised by the appeal of the local approval of the proposed project. Sections 30621 and 30625(b)(1) of the Coastal Act require a de novo hearing of the appealed project unless the Commission determines that no substantial issue exists with respect to the grounds for appeal. Commission staff recommends a finding of no substantial issue. If the Commission decides that the appellant’s contentions raise no substantial issue as to conformity with Chapter 3 of the Coastal Act, the action of the local government becomes final. Alternatively, if the Commission finds that a

substantial issue exists with respect to the conformity of the action of the local government with the Chapter 3 policies of the Coastal Act, the local coastal development permit is voided and the Commission typically continues the public hearing to a later date in order to review the coastal development permit as a de novo matter. [Cal. Pub. Res. Code §§ 30621 and 30625.] Section 13321 of the Coastal Commission regulations specifies that de novo actions will be heard according to the procedures outlined in Sections 13114 and 13057-13096 of the Commission’s regulations.

If there is no motion from the Commission to find no substantial issue, it will be presumed that the appeal raises a substantial issue and the Commission will schedule the de novo phase of the public hearing on the merits of the application at a subsequent Commission hearing. A de novo public hearing on the merits of the application uses the Chapter 3 policies of the Coastal Act. The Venice Land Use Plan (LUP), certified on June 14, 2001, is used as guidance. Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

If the Commission decides to hear arguments and vote on the substantial issue question, those who are qualified to testify at the hearing, as provided by Section 13117 of Title 14 of the California Code of Regulation, will have three minutes per side to address whether the appeal raises a substantial issue. The only persons qualified to testify before the Commission at the substantial issue portion of the appeal process are the applicants, persons who opposed the application before the local government (or their representatives), and the local government. Testimony from other persons must be submitted in writing. The Commission will then vote on the substantial issue matter. It takes a majority of Commissioners present to find that the grounds for the appeal raise no substantial issue.

V. DUAL PERMIT JURISDICTION AREA

Within the areas specified in Section 30601, which is known in the City of Los Angeles permit program as the *Dual Permit Jurisdiction* area, the Coastal Act requires that any development which receives a local coastal development permit also obtain a second (or “dual”) coastal development permit from the Coastal Commission. The Commission's standard of review for the proposed development in the *Dual Permit Jurisdiction* area is the Chapter 3 policies of the Coastal Act. For projects located inland of the areas identified in Section 30601 (i.e., projects in the *Single Permit Jurisdiction*), the City of Los Angeles local coastal development permit is the only coastal development permit required. The proposed project site is not located within the *Dual Permit Jurisdiction Area*.

VI. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The applicant proposes to demolish an existing one-story single-family dwelling, and construct an approximately 4,044 square foot, 30-foot high, three-story single-family dwelling and basement (**Exhibit 5**). The proposed 4-level structure will also have a 106 square foot balcony, an outdoor 21-foot by 7-foot swimming pool, and an attached 410 square foot three-car garage accessed from the alley (**Exhibit 5, page 7**).

The project site is a 4,013 square foot through lot located at 1620 Electric Avenue in Venice, over ½ of a mile inland of the beach (**Exhibits 1 & 2**). The project is located in the R2-1 zoned, Low Medium I and Multi-Family designated developed residential neighborhood of the Milwood subarea within the City’s Single Permit Jurisdiction Area (**Exhibit 3**). The site is in the center of the 1600 residential block of Electric Avenue, between Palms Boulevard and Superba Avenue. The subject lot fronts Electric Avenue, a one-way 40-foot wide street that connects Venice Boulevard and California Avenue. The rear property line adjoins Electric Court, the 15-foot wide alley behind the project site separating the 1600 residential block of Electric Avenue and the 1600 block of Crescent Place. This residential neighborhood predominantly features single-family and multi-family residences and duplexes that range from one-story wood bungalows to three-story-plus modern, contemporary structures. Industrial and commercial development exists to the south of the site across Electric Avenue on properties zoned M1-1-O and C2-1-O-CA within the North Venice subarea.

B. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS

Section 30625(b)(1) of the Coastal Act states that the Commission shall hear an appeal of a local government action carried out pursuant to Section 30600(b) unless it finds that no substantial issue exists as to conformity with Chapter 3 of the Coastal Act. The term “substantial issue” is not defined in the Coastal Act or its implementing regulations. Section 13115(b) of the Commission’s regulation simply indicates that the Commission will hear an appeal unless it “finds that the appeal raises no significant question.” In previous decisions on appeals, the Commission had been guided by the following factors:

1. The degree of factual and legal support for the local government’s decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act;
2. The extent and scope of the development as approved or denied by the local government;
3. The significance of the coastal resources affected by the decision;
4. The precedential value of the local government’s decision for future interpretations of its LCP; and,
5. Whether the appeal raises local issues, or those of regional or statewide significance.

Even when the Commission chooses not to hear an appeal, appellants nevertheless may obtain judicial review of the local government’s coastal permit decision by filing petition for a writ of mandate pursuant to Code of Civil Procedure, Section 1094.5.

Staff is recommending that the Commission find that a substantial issue exists with respect to whether the local government action conforms to the provisions of Chapter 3 of the Coastal Act for the reasons set forth below.

C. SUBSTANTIAL ISSUE ANALYSIS

As stated in Section IV of this report, the grounds for an appeal of a Coastal Development Permit issued by the local government prior to certification of its Local Coastal Program (LCP) are the Chapter 3 policies of the Coastal Act. Any local government Coastal Development Permit issued

prior to certification of its LCP may be appealed to the Commission. The Commission shall hear an appeal unless it determines that no substantial issue exists as to conformity with Chapter 3 policies of the Coastal Act.

The grounds for this appeal relate primarily to the proposed project's potential impacts to the community character of Venice and compliance with CEQA.

The Commission's standard of review for determining whether to hear the appeal is only whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code § 30625(b)(1); 14 C.C.R. § 13321. The Commission's decision will be guided by the factors listed in the previous section of this report (B. Factors to be Considered in Substantial Issue Analysis).

Community Character

The appellants contend that the City-approved development is not consistent with the Chapter 3 policies of the Coastal Act and the standards of the Venice LUP because it does not conform to the established community character, and it is out of scale with the surrounding residences within the Milwood subarea of Venice.

The proposed single-family residence has four levels (three stories and basement) and over 4,000 square feet of floor area. The surrounding development is primarily one- and two-story structures.

The protection of community character is a significant issue for the residents of Venice. Venice has a unique blend of style and scale of residential buildings, historical character, walk streets, diverse population, as well as expansive recreation areas and attractions, such as the Ocean Front Walk (boardwalk) and the beach. These features make Venice a popular destination for Southern California residents and tourists. As a result of its unique coastal districts, Venice is 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.

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. Comments from Venice residents during the March hearing expressed concerns over the lack of proper review and public input to preserve community character during the expedited approval process for projects issued De Minimis Waivers by the Commission. Since 2014, the Commission has decided to no longer process De Minimis Waivers for new residential projects in Venice in hopes that the City would properly address the concerns of the public with regards to the cumulative impacts of new residential development through the Local CDP process and through a more comprehensive approach. Through the local CDP process, the City of Los Angeles is able to address the public participation component of development projects by issuing public notices, holding public hearings and public comment periods for all such development projects in the Venice area, prior to Commission review.

The standard of review for the substantial issue determination is the Chapter 3 policies of the Coastal Act. The Coastal Act requires that the special communities be protected to preserve their unique characteristics and from negative impacts such as excessive building heights and bulks. In particular, Sections 30253(e) and 30251 of the Act, which state:

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.

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.

In its 2001 certified Venice Land Use Plan (LUP), the Commission recognized Venice's unique community character and popularity as a visitor serving destination, and as such, it is imperative that any new development be designed consistent with the community character of the area. While the certified Venice LUP is not the standard of review for finding substantial issue, the LUP policies provide guidance from which the Commission can evaluate the adequacy of a project's mitigation of impacts. When the LUP was certified, the Commission considered how to ensure that future surrounding area would be visually compatible with the character of the surrounding area and adopted residential building standards (e.g. height limits) to ensure development was designed with pedestrian scale and compatibility with surrounding development. Given the specific conditions and the eclectic development pattern of Venice, it is appropriate to use the certified LUP policies for determining whether or not the project is consistent with relevant Chapter 3 policies of the Coastal Act.

The policies set forth by the certified Venice LUP echo the priority expressed in Coastal Act for preservation of the nature and character of existing residential neighborhoods:

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. 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.*

Policy I. A. 1. b. Residential Development, states, in part:

ii. Building facades shall be varied and articulated to provide a pedestrian scale which results in consistency with neighboring structures on small lots. Such buildings shall

provide habitable space on the ground floor, a ground level entrance and landscaping and windows fronting the street...

The City determined that the project is in character with the surrounding area. In its findings that the project is in character with the surrounding area and other three-story single-family residences, the City makes reference to eight large, modern homes and duplexes which have recently been approved by the Commission (5-14-0212, 5-14-0237, 5-14-0239, 5-14-0240, 5-14-0288, 5-14-0523, 5-14-0290, and 5-14-0289; **Exhibit 7, page 12**). The Commission issued coastal development permits for four (4) three-story single-family residences in the Southeast Venice subarea, as well as two (2) two-story single family residences and two (2) three-story duplexes in the Oakwood subarea. However, all of these projects referenced by the City are outside of the Milwood subarea where the proposed project site is located, and, therefore, are not substantial evidence to support the proposed project's conformity to the character of the Milwood community. Consequently, further review is necessary to determine the proposed project's conformance to the established community character of the 1600 residential block of Electric Avenue within the Milwood subarea.

Typically, the Commission looks at allowable land uses, density, height, mass, and scale when evaluating whether or not a project is visually compatible with the character of the neighborhood. The local coastal development permit being appealed approves the demolition of an existing one-level, single-family dwelling and the construction of a new four-level, approximately 4,044 square foot, 30-foot high, single-family dwelling on a site in the Milwood community of Venice that is designated as "Multiple Family Residential" and "Low Medium I" by the certified LUP.

The Venice LUP provides specific provisions regarding Multi-Family Neighborhoods and Multiple Family Residential - Low Medium I Density land use and height limit for the Southeast Venice and Milwood Subareas:

Policy I. A. 5. Preserve and Protect Stable Multi-Family Neighborhoods.

Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained and improved.

Policy I. A. 6. Multi-Family Residential - Low Medium I Density.

Accommodate the development of duplexes and multi-family dwelling units in the areas designated as "Multiple Family Residential" and "Low Medium I" on the Venice Coastal Land Use Plan (Exhibits 9 through 12). Such development shall comply with the density and development standards set forth in this LUP.

Southeast Venice and Milwood

Use: Two units per lot, duplexes and multi-family structures

Density: One unit per 2,500 square feet of lot area. Lots smaller than 5,000 square feet are limited to a maximum density of two units per lot.

Replacement Units/Bonus Density: Lots greater than 5,000 square feet can add extra density at the rate of one unit for each 2,000 square feet in excess of 5,000 square feet in lot area if the unit is a placement affordable unit reserved for low and very low income persons. (See LUP Policies I.A.9 through I.A.16).

Yards: Yards shall be required in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.

Height: Not to exceed 25 feet for buildings with flat roofs, or 30 feet for buildings with stepped back or varied rooflines. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).

The project meets the allowable density, maximum height, and land use requirements of the Venice LUP. 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) measured above the fronting right-of-way. The Venice Specific Plan, which the Commission has not certified, also sets forth the same height limits as the certified Venice LUP. Although the project, as proposed, conforms to the mandated height limit, the four-level structure will be built to the maximum allowable 30-foot height limit of the LUP for varied rooflines. A varied roofline is meant to provide the building articulation to help the structure blend into the neighborhood. This roof, although varied does not provide the structure a more pedestrian scale, nor does it help blend the structure with the existing nearby residential development. The project, as proposed, raises a substantial issue with respect to its potential non-conformance with the Chapter 3 community character policies of the Coastal Act and further review is necessary.

Additionally, this section of the Milwood subarea is comprised of an amalgam of older and newer one-to-three story homes that are mostly rooted in the Craftsman and Vernacular architectural style; the newer buildings are designed with Contemporary and Modern idiosyncrasies. The proposed single-family residence can generally be described as Contemporary (**Exhibits 4 & 5**). Inconsistencies in existing architectural style aside, the proposed development is not consistent with the community character in mass and scale of existing development. Therefore, the proposed development raises a substantial issue in regards to Chapter 3 of the Coastal Act.

The surrounding neighborhood consists of multi-unit residential structures and single-family residences that vary in height between 13 and 30 feet (**Exhibit 8**). The dwellings on the 1600 residential block of Electric Avenue are predominantly one and two stories, with a few three-story structures. The one-story structures range from 13 to 15 feet high structures, and the two-story structure range from 22 to 27 feet high. To the south of the proposed project site, there exists one-story and two-story, industrial and commercial development on properties zoned M1-1-O and C2-1-O-CA within the North Venice subarea, but not within the Milwood Subarea. Electric Avenue separates the North Venice and Milwood subareas. Therefore, the Milwood residential area begins north of Electric Avenue, where the project site is located. In addition, most of the main entrances to these industrial and commercial structures face Venice Boulevard and not Electric Avenue.

The site is currently developed with a one-story, single-family residence. The existing residence is flanked by a one-story Craftsman bungalow on the east side and a three-story, two-unit condominium (1626/1628 Electric Avenue) on the west side (**Exhibit 8, page 4**).

In 2003, the City of Los Angeles approved the construction of a three-story, 30-foot high residential structure consisting of two (2) condominiums with a roof access structure that extends to a height of 37 feet on a 3,862 square foot lot at 1626/1628 Electric Avenue, directly next to and east of the proposed project site. Presently, this is the only visible three-story structure on the 1600 Block of Electric Avenue. Moreover, unlike the proposed project being appealed, this structure is a multi-family residence with less square footage in floor area per residential unit (**Exhibit 8, page 2 & 4**).

The other three-story, 28-foot high structure that exists on the same residential block was processed in 2004 as a De Minimis Waiver project by the Executive Director of the Commission (5-04-020-W) (**Exhibit 9**). De Minimis Waiver No. 5-04-020-W (1634 Electric Avenue) authorizes the demolition of a detached garage, and construction of a 28-foot high, 681 square foot single-family residence (2nd Unit) over a two-car garage. This structure, however, is not visible from the Electric Avenue because it was built as a rear-yard secondary residential unit to an existing one-story, 15-foot high single-family residence. In addition, the proposed project being appealed still exceeds the 1634 Electric Avenue multi-story structure both in height and square footage.

In 2012, the Executive Director of the Commission issued another waiver of coastal development permit requirements for a three-story single-family project within 200 feet of the proposed project site. De Minimis Waiver No. 5-12-184-W (1627 Crescent Place) approved the demolition of two detached single-story residential structures, and the construction of a three-story, 28-foot high (with a 31-foot high elevator housing), 3,531 square foot single-family residence with a 380 square foot two-car garage. This dwelling, which is currently under construction, will be located on the 1600 block of Crescent Place and, therefore, does not directly contribute to the Electric Avenue streetscape. Nonetheless, this dwelling will still be lower, in height, overall, and smaller, in scale, than the project being appealed.

CEQA

The appellants also oppose the proposed project on the grounds that it violates the California Environmental Quality Act (CEQA). The appellants argue that the CEQA Notice of Exemption is invalid because an environmental assessment is required to assess the impact of successive out-of-scale projects in Venice. The Commission has no authority to review and invalidate a lead agency's CEQA determination and thus, the appellants' contention does not constitute a substantial issue.

Other Allegations:

The appellants also oppose the proposed side-yard swimming pool because of the potential need for an over-height fence, further decreasing the project's compatibility with the neighborhood. Additionally, the appellants stress that the swimming pool is not appropriate during California's extreme drought. Water conservation could have been addressed if the applicants proposed or the City required the pool to include water saving features such as leak detection sensors or a pool cover, but these features were not included or conditioned in the City's action to approve the project. However, the swimming pool itself does not violate the policies of the Coastal and does not raise a substantial issue.

Conclusion

The City's Notice of Final Local Action for Local Coastal Development Permit No. ZA-2014-1550 and accompanying staff reports and file records state that the City applied the policies of Chapter 3 of the Coastal Act and concluded, in part, that the development, as proposed and conditioned by the City, would be consistent with Chapter 3 of the Coastal Act and will not prejudice the ability of the City to prepare an LCP for the Venice Coastal Zone.

A substantial issue exists with respect to the project's conformance with Chapter 3 of the Coastal Act, and with the approval of the local coastal development permit, because the City-approved project does not adequately mitigate the potential community character impacts of the development. These types of impacts could be mitigated if the project were redesigned or conditioned to require features to minimize water use and articulate the structure consistent with surrounding development.

Only with careful review of the City-approved project can the Commission ensure that community character is protected. If it finds that a substantial issue exists, the Commission will have the opportunity to review and act on the project at the subsequent de novo hearing. Therefore, the Commission Staff recommends that the Commission find that a substantial issue exists with respect to the project's conformance with Chapter 3 of the Coastal Act, and with the approval of Local Coastal Development Permit No. ZA-2014-1550.

Applying the five factors listed in the prior section clarifies that the appeal raises a "substantial issue" with respect to Chapter 3 of the Coastal Act, and therefore, does meet the substantiality standard of Section 30265(b)(1).

The first factor is the degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. The City discussed consistency with the Venice Specific Plan, Los Angeles Municipal Code, and Venice Community Plan. The City also found that the proposed project complies with the Chapter 3 policies of the Coastal Act with regards to land use, density, and height. The City did not, however, substantially support the project's consistency with the community character provisions of the Coastal Act (Sections 30251 and 30253) and the Certified Venice LUP.

The second factor is the extent and scope of the development as approved or denied by the local government. The City-approved development is a three-story, 30-foot high 4,044 square foot single-family residence. The scope of this structure is greater than any other single-family residence on the subject block.

The third factor is the significance of the coastal resources affected by the decision. The project would negatively impact the character of the surrounding community and is not consistent with the surrounding development pattern. Therefore, the development could significantly and adversely affect coastal resources.

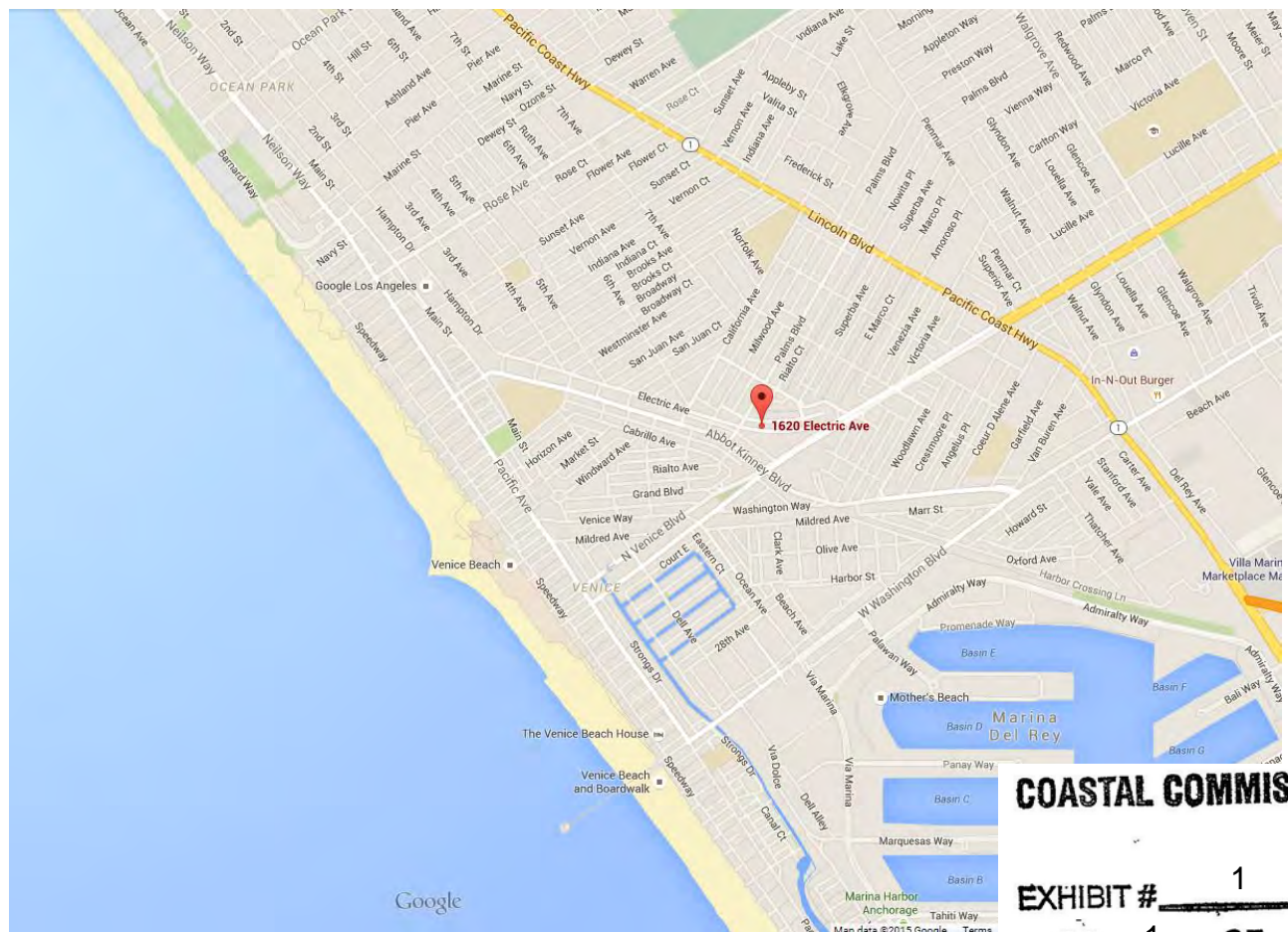
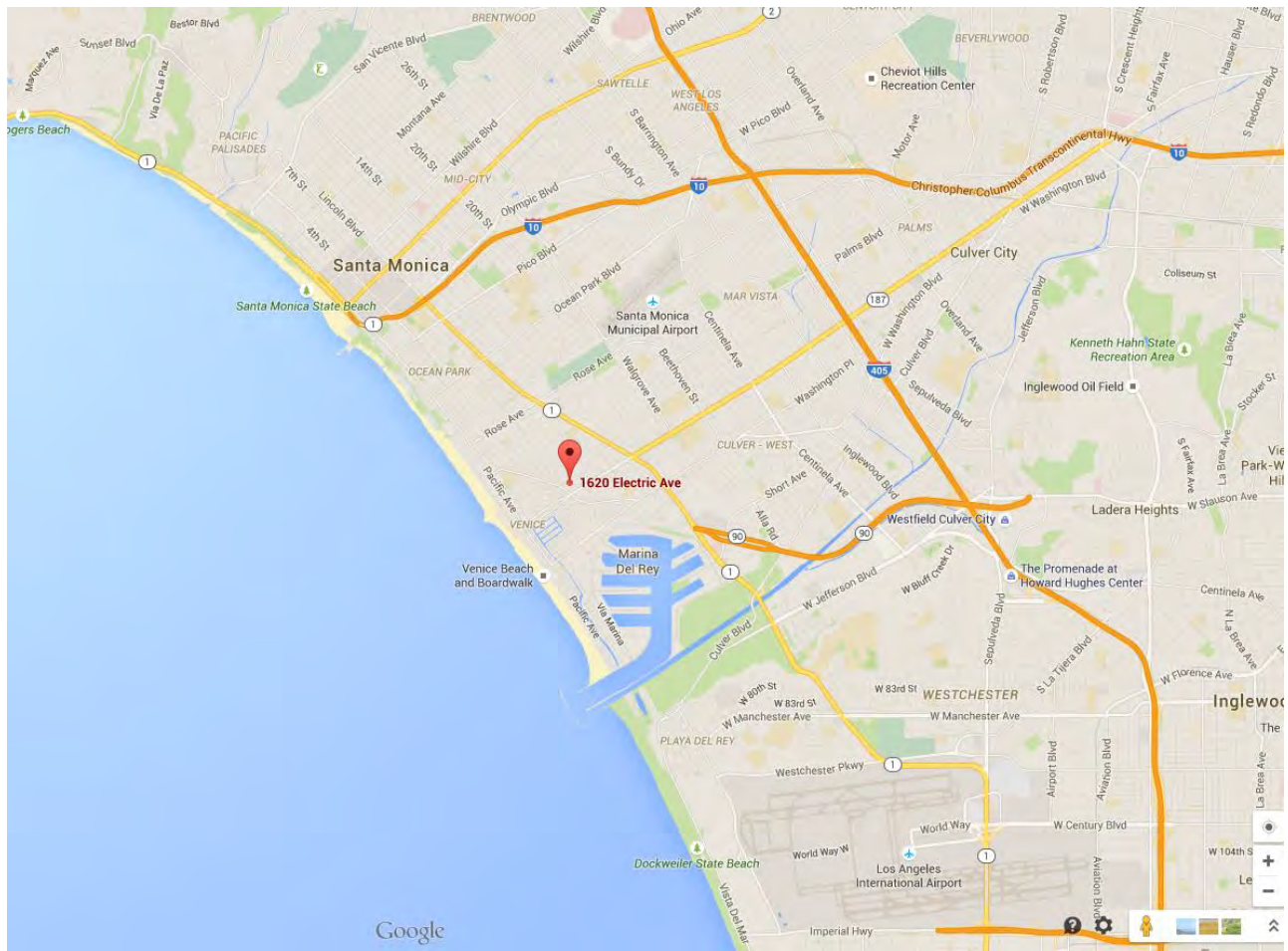
The fourth factor is the precedential value of the local government's decision for future interpretations of its LCP. The City does not currently have a certified LCP, but it does have a certified Land Use Plan (LUP). The proposed development is not consistent with the mass and scale of the existing structures in this area of Venice, and, thus, with the policies of the certified Venice LUP. Thus, the project, as approved and conditioned, raises a substantial issue with regard to the

Appeal –Substantial Issue

project's conformity with the community character policies Chapter 3 of the Coastal Act and the certified Venice LUP and would have the potential to set a negative precedent for future development.

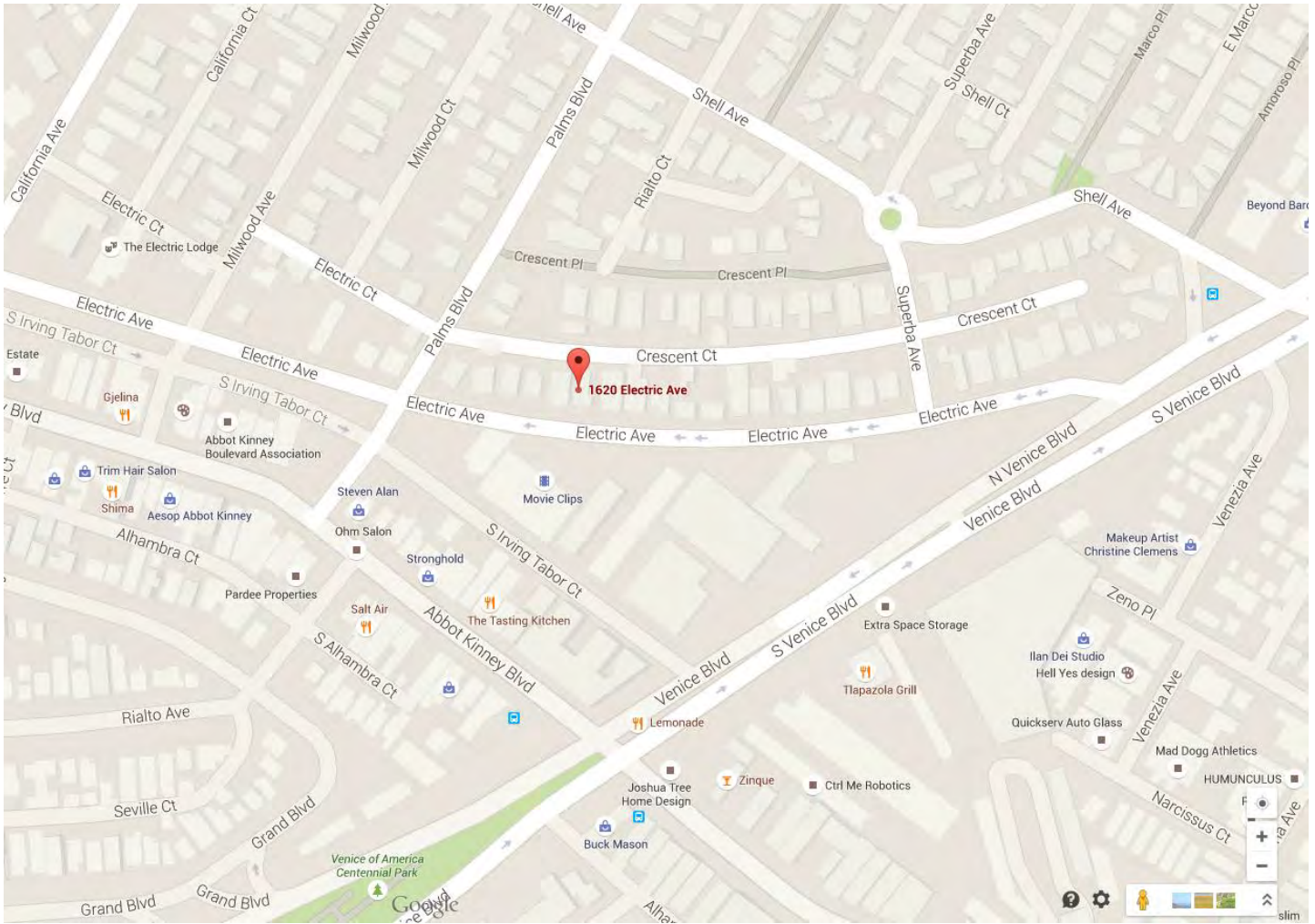
The final factor is whether the appeal raises local issues, or those of regional or statewide significance. Impacts to coastal resources are important statewide issues, but this appeal also raises local issues. The City addressed CEQA with a CEQA Notice of Exemption, which concerns a local issue that does not raise a substantial issue. However, Venice is one of the most popular visitor destinations in the state making its preservation as an eclectic community with a unique character a statewide issue. Therefore, the City's approval does raise issues of statewide significance with regards to Venice's community character.

In conclusion, the issues for this appeal relate primarily to the potential impacts to the community character of Venice, compliance with CEQA, and water conservation. The Commission has no jurisdiction to review local government's compliance with CEQA. In this case with regards to community character and water conservation, the proposed project is not in conformity with the Chapter 3 policies of the Coastal Act. Therefore, Commission staff recommends that the Commission find that the appeal raises a substantial issue as to conformity with Chapter 3 policies.



COASTAL COMMISSION

EXHIBIT # 1
PAGE 1 OF 1



COASTAL COMMISSION

EXHIBIT # 2
PAGE 1 OF 1

Milwood



Single Family Residential

- Low
- Low Medium I

Multiple Family Residential

- Low Medium I
- Low Medium II
- Medium



Proposed Project Site

COASTAL COMMISSION

EXHIBIT # 3
PAGE 1 OF 2



Exhibit 2a
Venice Coastal Zone

Note: Map does not show area of Palms • Del Rey portion of coastal zone that is located inland of Lincoln Boulevard.

EXHIBIT # 3
PAGE 2 OF 2



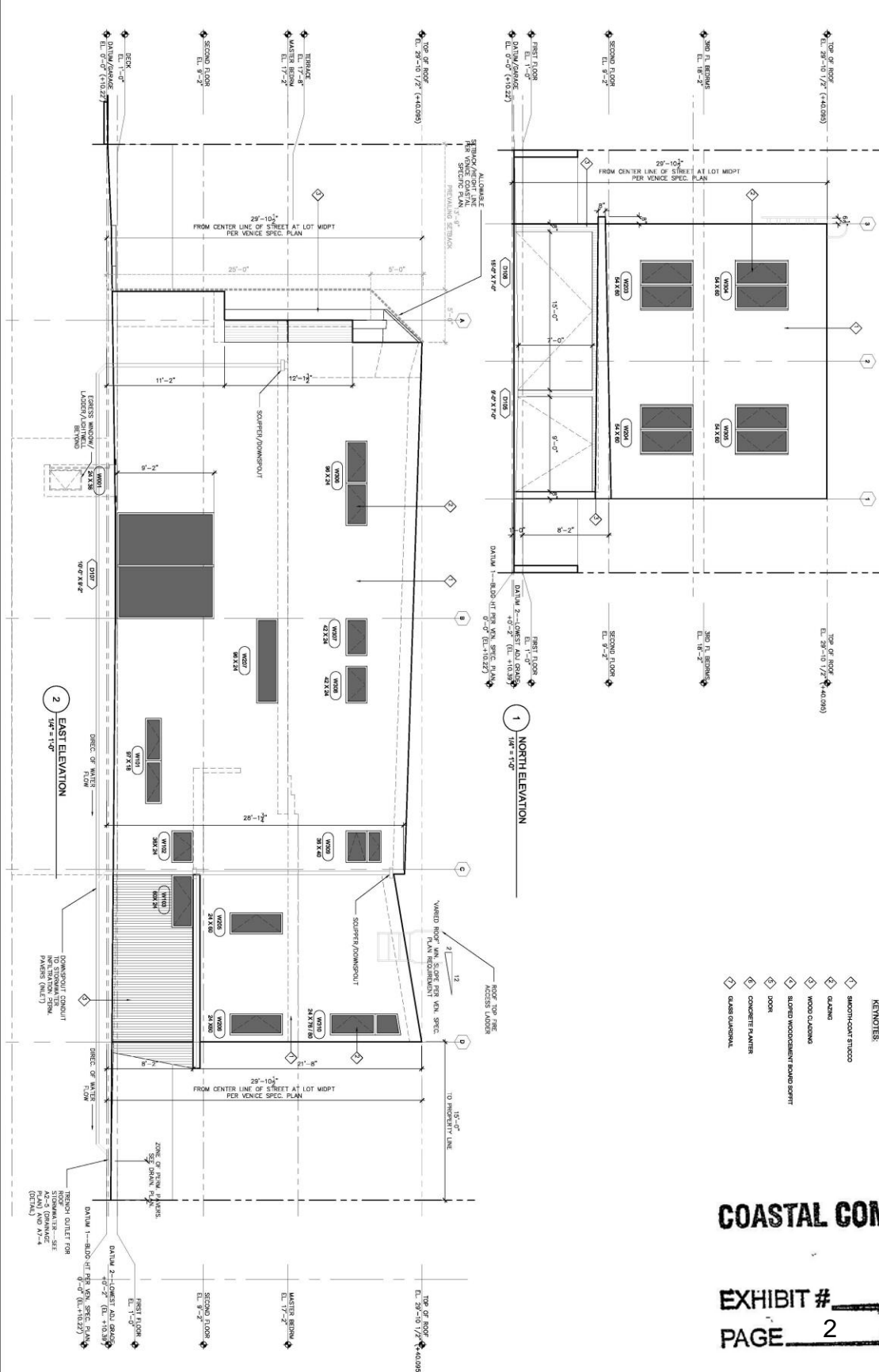


Project Rendering

COASTAL COMMISSION



EXHIBIT # 5
PAGE 1 OF 7



- KEYNOTES:
- 1. SMOOTH-COAT STUCCO
 - 2. CLADDING
 - 3. WOOD CLADDING
 - 4. SLOPED WOODCLAD BOARD SPYTT
 - 5. DOOR
 - 6. CONCRETE FLOORS
 - 7. STAIRS QUADRANT

COASTAL COMMISSION

EXHIBIT # 5
PAGE 2 OF 7

10-19 ARCHITECTURE, LTD.

239 WESTWOOD AVE, STE 207
LOS ANGELES, CA 90024

2116 AVENUE 11, STE 202
WILMINGTON, DE 19804

SMITH RESIDENCE

1620 ELECTRIC AVE
VENICE, CA 90291

JEFF SMITH
1620 ELECTRIC AVE
VENICE, CA 90291

BUILDING
ELEVATIONS

SCALE: 1/4" = 1'-0"

1. planning application
2. plan check submission

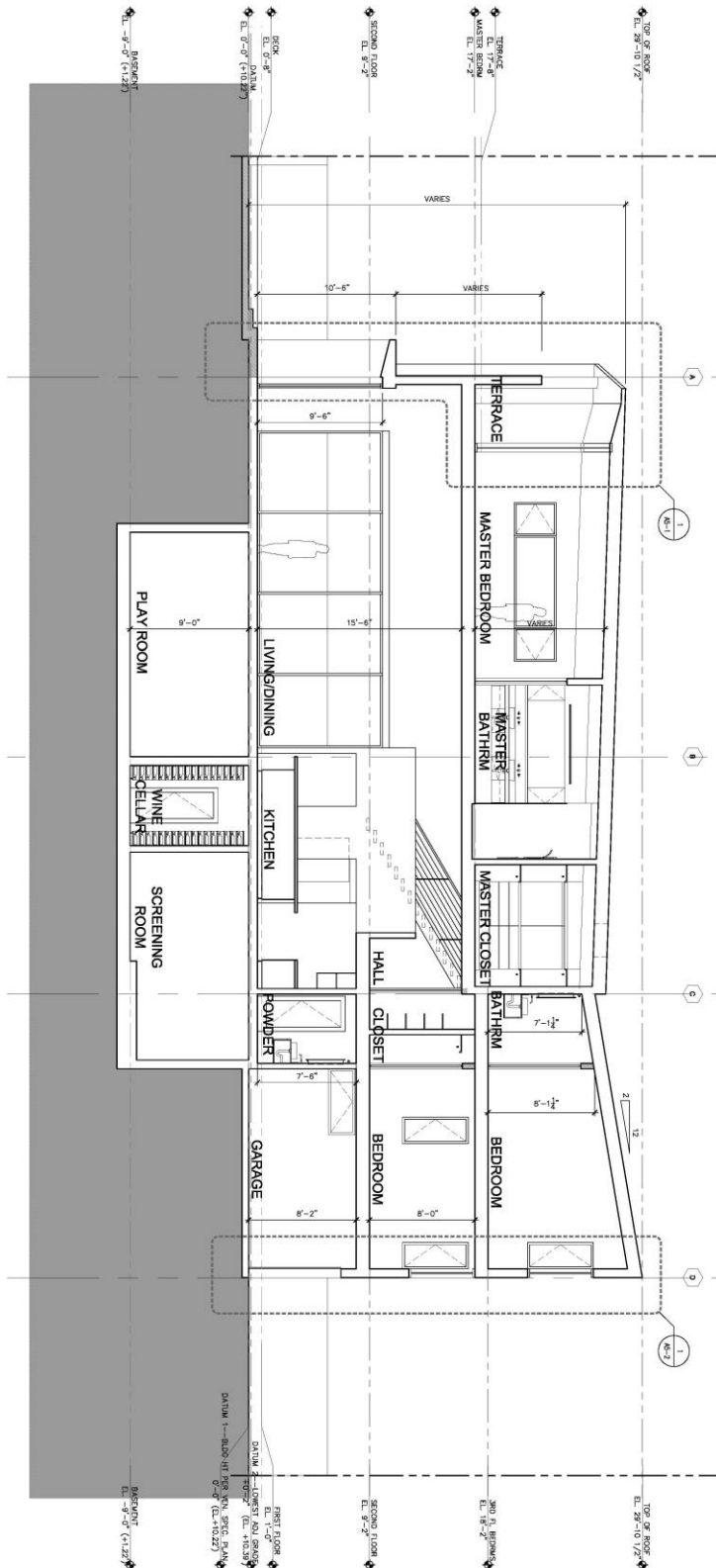
2014-04-18
2014-08-20

NO CHANGES
REVISIONS

A3-2

COASTAL COMMISSION

EXHIBIT # 5
PAGE 3 OF 7



1 LONGITUDINAL SECTION AA
LOOKING WEST
SCALE: 1/8" = 1'-0"

project:

10-19 ARCHITECTURE, LTD.

225 WESTWOOD AVE, STE 207
LOS ANGELES, CA 90024

225 WESTWOOD AVE, STE 207
LOS ANGELES, CA 90024

project:

SMITH RESIDENCE

1620 ELECTRIC AVE
VENICE, CA 90291

owner:

JEFF SMITH
1620 ELECTRIC AVE
VENICE, CA 90291

drawing:

BUILDING
SECTIONS

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

submittals:

1. planning application
2. plan check submission

2014-04-18
2014-08-20

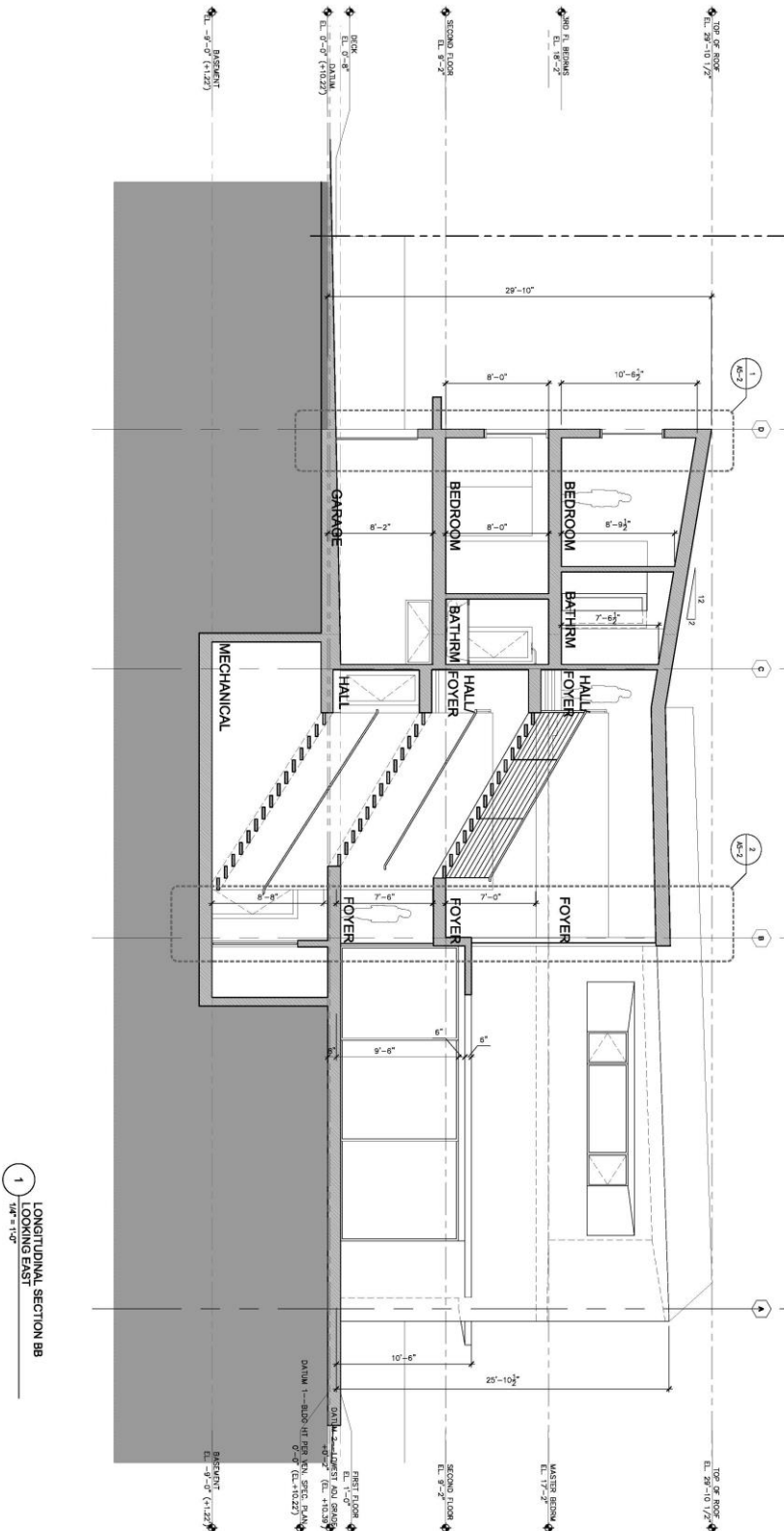


sheet no.:

A4-1

COASTAL COMMISSION

EXHIBIT # 5
PAGE 4 OF 7



1 LONGITUDINAL SECTION BB
LOOKING EAST
SCALE: 1/8" = 1'-0"

10-19 ARCHITECTURE, LTD.

225 WESTWOOD AVE., STE 207
LOS ANGELES, CA 90024

225 WESTWOOD AVE., STE 207
LOS ANGELES, CA 90024

SMITH RESIDENCE

1620 ELECTRIC AVE
VENICE, CA 90291

JEFF SMITH
1620 ELECTRIC AVE.
VENICE, CA 90291

BUILDING
SECTIONS

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

1. planning application
2. plan check submission

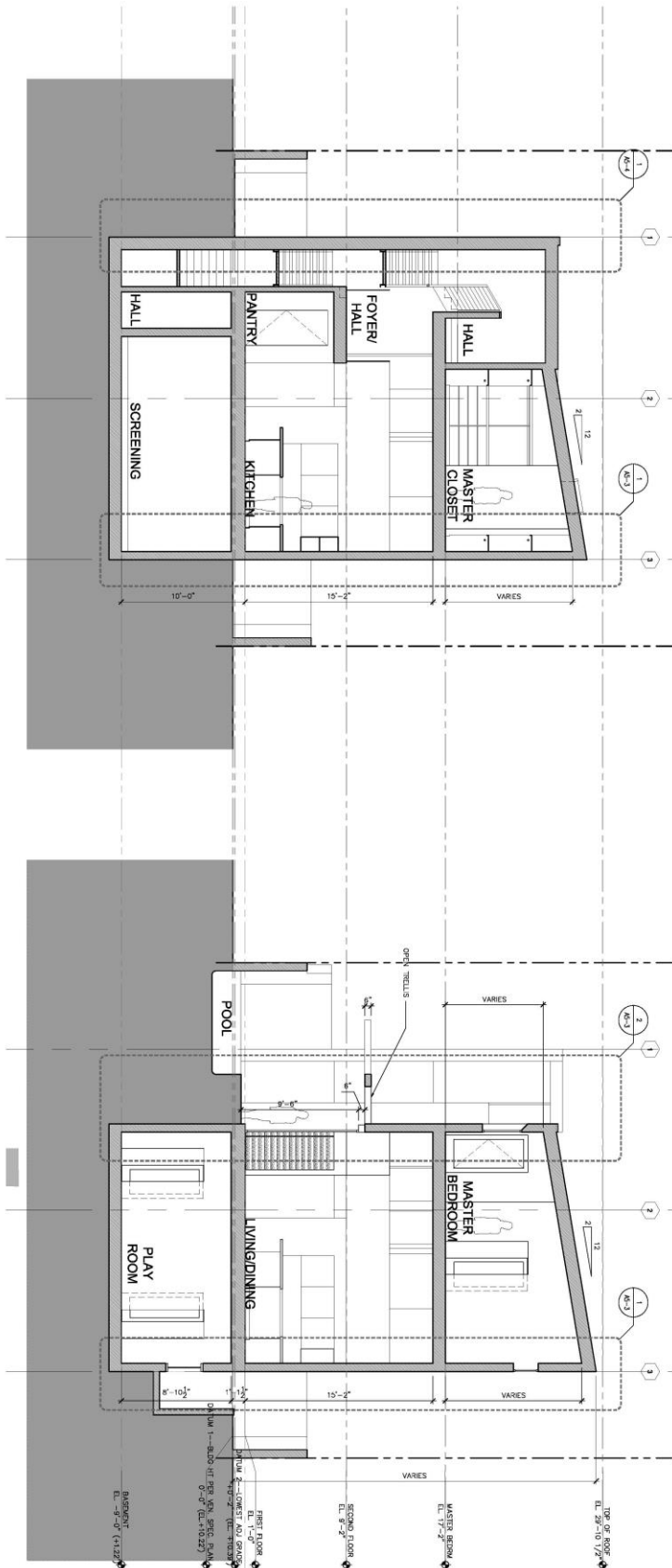
2014-08-20



A4-2

COASTAL COMMISSION

EXHIBIT # 5
PAGE 5 OF 7



10-19 ARCHITECTURE, LTD.

239 WESTWOOD AVE., STE 207
LOS ANGELES, CA 90024

214 AVENUE 19, SUITE 207
WWW.10-19ARCHITECTURE.COM

SMITH RESIDENCE

1620 ELECTRIC AVE
VENICE, CA 90291

JEFF SMITH
1620 ELECTRIC AVE.
VENICE, CA 90291

BUILDING SECTIONS

SCALE: 1/4" = 1'-0"

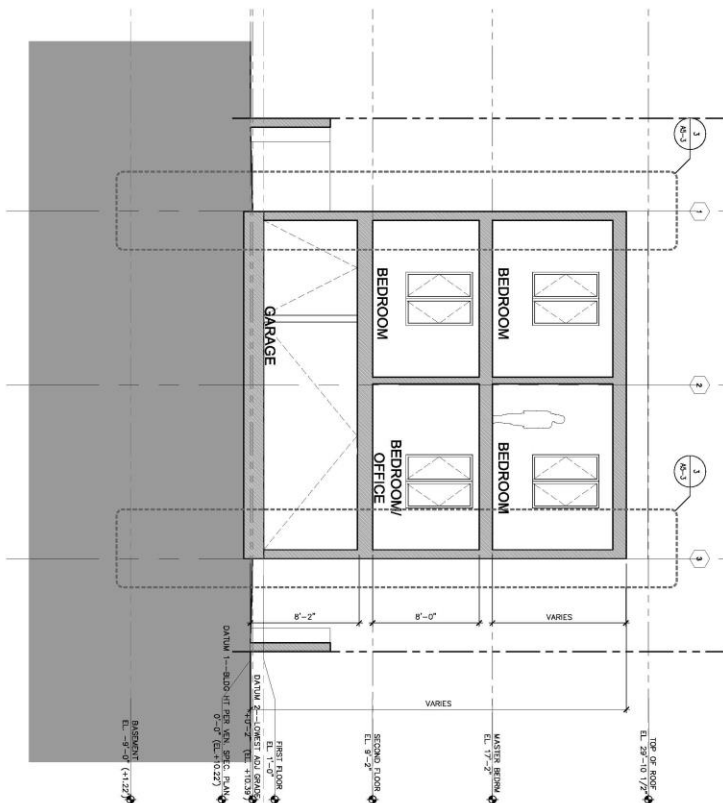
1. planning application
2. plan check submission
2014-04-18
2014-08-20



A4-3

COASTAL COMMISSION

EXHIBIT # 5
PAGE 6 OF 7



10-19 ARCHITECTURE, LTD.

225 WESTWOOD AVE, STE 207
VENICE, CA 90291
WWW.10-19ARCHITECTURE.COM

SMITH RESIDENCE

1620 ELECTRIC AVE
VENICE, CA 90291

JEFF SMITH
1620 ELECTRIC AVE.
VENICE, CA 90291

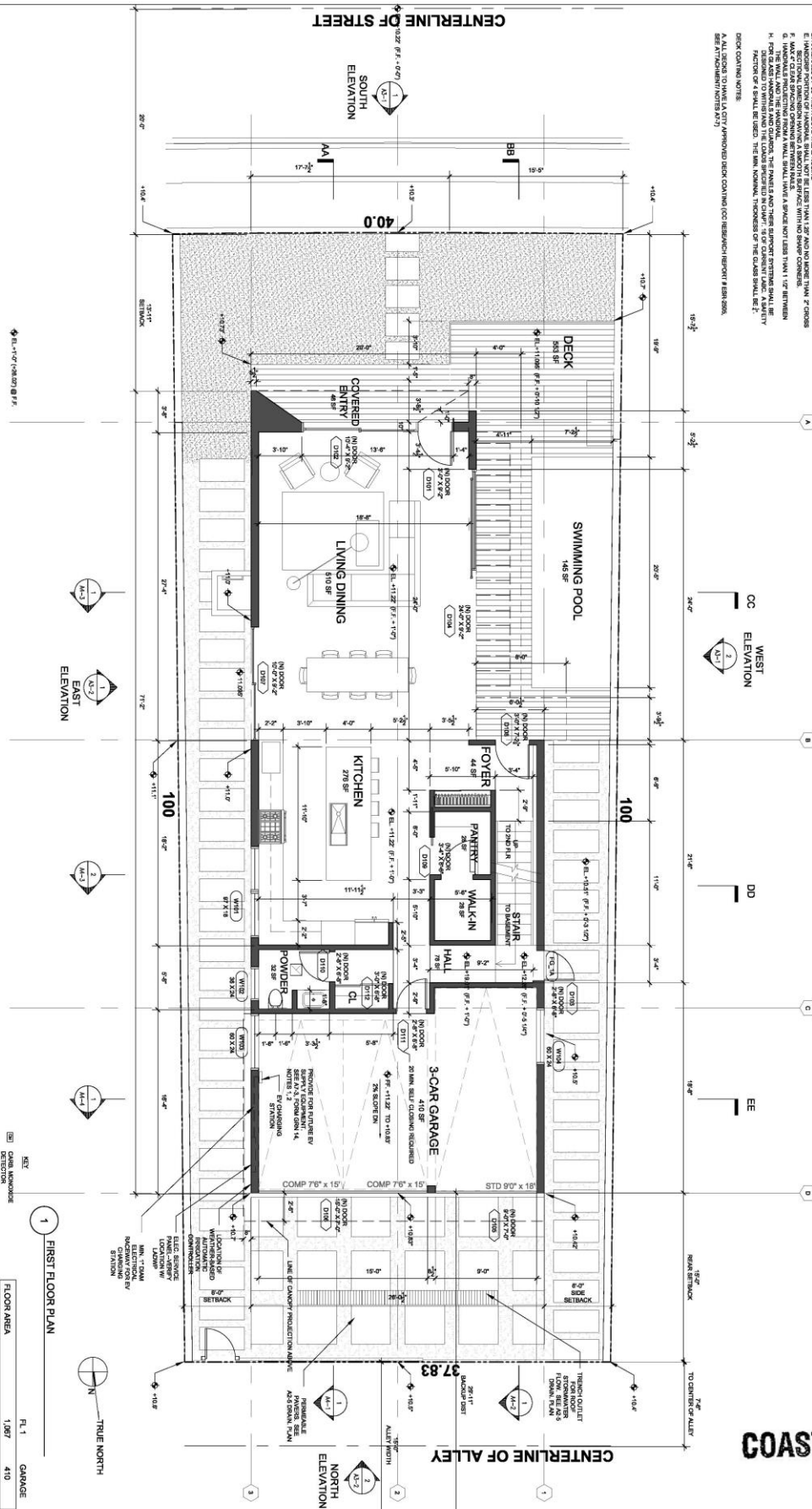
BUILDING
SECTIONS

SCALE: 1/4" = 1'-0"

1. planning application
2. plan check submission
2014-08-20



A4-4

[illegible]

10-19 ARCHITECTURE, LTD.

SMITH RESIDENCE

FIRST FLOOR
PLAN

1. planning application
2. plan check submission

LIBRARY
ANDREW
A.
LU
No. C-29025

A2-1

CALIFORNIA COASTAL COMMISSION

South Coast District Office
200 Oceangate, 10th Floor
Long Beach, California 90802-4416
(562) 590-5071 FAX (562) 590-5084
WWW.COASTAL.CA.GOV

**COMMISSION NOTIFICATION OF APPEAL**

DATE: June 05, 2015
TO:
City of Los Angeles
200 N. Spring Street 7th floor
Los Angeles, CA 90012
FROM: Charles Posner
RE: **Commission Appeal No. A-5-VEN-15-0036**

Please be advised that the coastal development permit decision described below has been appealed to the California Coastal Commission pursuant to Public Resources Code Sections 30603 and 30625. Therefore, the decision has been stayed pending Commission action on the appeal pursuant to the Public Resources Code Section 30623.

Local Permit #: ZA 2014-1550
Applicant(s): Attn: J. Edward Smith
Description: Demolition of a single family dwelling and detached accessory structures and the construction of a new single family dwelling
Location: 1620 ELECTRIC AVE, VENICE, CA 90291
Local Decision: Approval With Special Conditions
Appellant(s): Robin Rudisill, Gabriel Ruspini, Todd Darling, Mark Kleiman, Arnold Springer
Leigh Marling, Gray Marshall, Deborah Marshall
Date Appeal Filed: 05/28/2015

The Commission appeal number assigned to this appeal is A-5-VEN-15-0036. The Commission hearing date has not been scheduled at this time. Within 5 working days of receipt of this Commission Notification of Appeal, copies of all relevant documents and materials used in the City of Los Angeles, consideration of this coastal development permit must be delivered to the South Coast District Office of the Coastal Commission (California Administrative Code Section 13112). Please include copies of plans, relevant photographs, staff reports and related documents, findings (if not already forwarded), all correspondence, and a list, with addresses, of all who provided verbal testimony.

A Commission staff report and notice of the hearing will be forwarded to you prior to the hearing. If you have any questions, please contact at the South Coast District Office.

cc: Attn: J. Edward Smith
Attn: Robin Rudisill
10-19 Architecture, Ltd Attn: Andy Liu

COASTAL COMMISSION

EXHIBIT # 6
PAGE 1 OF 6

CALIFORNIA COASTAL COMMISSION

SOUTH COAST DISTRICT OFFICE
200 OCEANGATE, 10TH FLOOR
LONG BEACH, CA 90802-4418
VOICE (562) 590-5071 FAX (562) 590-5084

**APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT**

Please Review Attached Appeal Information Sheet Prior To Completing This Form.

SECTION I. Appellant(s)

Name: See attached Appellant list

Mailing Address: 3003 Ocean Front Walk

City: Venice

Zip Code: 90291

310-721-2343

SECTION II. Decision Being Appealed

1. Name of local/port government:

City of Los Angeles

2. Brief description of development being appealed:

Demolition of an existing single-family dwelling and detached accessory structures and construction of a new single-family dwelling with three-car garage and swimming pool. 2A-2014-1550-CDP

3. Development's location (street address, assessor's parcel no., cross street, etc.):

1620 Electric Ave, Venice, APN: 424-101-3029, nearest cross street is Palms Blvd

4. Description of decision being appealed (check one.):

- ☒ Approval; no special conditions
☐ Approval with special conditions:
☐ Denial

Note: For jurisdictions with a total LCP, denial decisions by a local government cannot be appealed unless the development is a major energy or public works project. Denial decisions by port governments are not appealable.

TO BE COMPLETED BY COMMISSION:

APPEAL NO: 1A-5-Ven-15-0036
DATE FILED: 5-28-15
DISTRICT: South Coast

COASTAL COMMISSION

EXHIBIT # 6
PAGE 2 OF 6

- Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section.
- State briefly **your reasons for this appeal**. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)
- This need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

The decision by the ZA is invalid as it did not adequately address the issues of mass, scale and character as required by both the Venice Coastal Zone Specific Plan and Venice Land Use Plan, which addresses the Coastal Act Chapter 3 policies which make up the required Findings for the CDP. The Applicants presented misleading data about the neighborhood that misrepresented the mass and scale of the proposed project. The ZA did not consider the community representatives' statements about the compatibility of the project to the immediate existing neighborhood (see directly below).

Reasons for Appeal

Violation of Coastal Act and Venice Land Use Plan

The Venice Coastal Zone Specific Plan purpose is "To regulate all development, including use, height, density, setback, buffer zone and other factors in order that it be compatible in character with the existing community and to provide for the consideration of aesthetics and scenic preservation" (Section 3.F). It requires findings that a project is compatible in mass, scale and character to its adjoining neighborhood and is consistent with the Land Use Plan (sect. 8.C Findings). The second Finding requires "That the Venice Coastal Development Project is in conformity with the Venice Local Coastal Program," which at this time consists of the Coastal Commission-certified Venice Land Use Plan.

This project, a 3-story single-family home would be situated in a predominately single-story neighborhood, Electric Avenue from Milwood to the north and Venice Blvd to the south. It is set on the east side of the street, the west being commercial. There is one 3-story home, adjacent to the proposed development, built before both the city and state plans were in force. This should in no way be considered as a precedent. Nonetheless, this structure, consisting of two condos is 3,532 total sq ft. compared with the home proposed at 4,411 sq ft.

The average size lot (excluding the commercial lots on the west side) is 4,149 sf; the house they propose covers 4,411 sq ft, a FAR of 110%. Contrast that with its immediate neighborhood, with same lot average of 4,149, the average FAR is 42%. Looking at the houses further, the average is 1,719 sq ft. The smallest house is 850 sq ft and the two largest with 5,410 sq ft and 3,510 sq ft are multi-unit buildings. Even with the increased occupancy, these two buildings are more in scale with the neighborhood than the proposed project. The largest existing SFD is 2,438 sq ft; the proposed project would be 55% larger than the average FAR and 19% larger than the multi-unit buildings.

COASTAL COMMISSION

EXHIBIT # 6
PAGE 3 OF 6

Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

Policy I. E. 2. Scale. New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings that 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..."

Also, a swimming pool in a front yard should be questioned, as this would require an over-height fence, further decreasing the compatibility with the neighborhood. In addition, during this period of the worst drought in California's history, with the most severe effect in Southern California, it should be questioned whether a swimming pool should be approved at all. Water is a previous resource of limited quantity and must be protected, certainly by the Coastal Commission if no one else.

Mandated Findings:

The Policy Groups of the Venice Land Use Plan, Chapter II, address Policies 30244, 30250, 30251, 30252 and 30253 of Chapter 3 of the Coastal Act. It is those Chapter 3 Policies that are the basis for the CDP's mandated Findings.

1. Ms Wyatt makes conclusory findings, not factual findings. "The project complies with all applicable zoning laws and has been approved for Venice Specific Plan compliance (see Venice Sign-off Form) (p.19). When the VSO is used by City Planning it is not required to make Findings. There is nothing on the form that asks for a determination of compatibility of mass, scale and character. Not one of its "Findings" mentions impact on the neighborhood but deal almost exclusively with the zoning. Throughout her defense, Ms Wyatt throws out a red herring, replacement of SFD with another SFD, albeit bigger, is her argument that this meets the requirements of the Venice Coastal Zone Specific Plan.

2. The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976. The City insists that they do not need to make this finding; that without guidance from the Coastal Commission, they cannot make a finding on this. This goes to cumulative impact - demolish one type of house of a certain age and at some point there is that tipping point and we have lost the character of Venice. Yet here, Ms Wyatt is making a Finding, "no deviations." To say replacing like with like, in this case replacing a small bungalow with a 4,411 sq ft house is like saying because there are 10 cats on the block, one can bring a tiger in your home. When do we say we have breached the cumulative impact and all the original homes will be slated for demolition and we have a street of tigers?

3. This is not about style or design of a house; it is about the character of the neighborhood and this project is not compatible with the neighborhood character by its sheer massing and its out of scale dimensions, the placement of a three-story structure in a predominately one-story neighborhood. Ms Wyatt believes that considering mass, scale and character is to deny its existence.

The Zoning Administrator makes many statements in the Determination that mischaracterize the opposition to this project. She does not acknowledge that the main thrust of the argument is about mass, scale and character but tries to focus attention away by stating that the opposing statements had more to do with ancillary considerations: "Issues related to privacy, light/shading, construction related impacts... (p. 19 Determination letter of March 25, 2015). If you read from page 6, you will see

COASTAL COMMISSION

EXHIBIT # 6

PAGE 4 OF 6

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.

Robert Rodwell
Todd D. [unclear]
Mark Keim

[Signature]
Signature of Appellant(s) or Authorized Agent

Date:

5-28-15

Note: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby
authorize _____

to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date: _____

COASTAL COMMISSION

EXHIBIT # 6

PAGE 5 OF 6

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or Authorized Agent

Date: May 28, 2015

Note: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby
authorize

_____ to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date: _____

COASTAL COMMISSION

EXHIBIT # 6

PAGE 6 OF 6

LYNN K. WYATT
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

R. NICOLAS BROWN
SUE CHANG
LOURDES GREEN
CHARLES J. RAUSCH, JR.
JIM TOKUNAGA
FERNANDO TOVAR
DAVID S. WEINTRAUB
MAYA E. ZAITZEVSKY

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

CDP

DEPARTMENT OF
CITY PLANNING

MICHAEL J. LOGRANDE
DIRECTOR

OFFICE OF
ZONING ADMINISTRATION

200 N. SPRING STREET, 7TH FLOOR
LOS ANGELES, CA 90012
(213) 978-1318
FAX: (213) 978-1334
www.planning.lacity.org

March 25, 2015

J. Edward Smith (A)(O)
218 North Canon Drive
Beverly Hills, CA 90210

Andy Liu (R)
10-19 Architecture, Ltd.
2330 Westwood Boulevard, #207
Los Angeles, CA 90064

CASE NO. ZA 2014-1550(CDP)(MEL)
COASTAL DEVELOPMENT PERMIT
1620 Electric Avenue
Venice Planning Area
Zone : R2-1
D. M. : 108B145
C. D. : 11
CEQA : ENV 2014-1549-CE
Legal Description : Lot 29, Block 2,
Venice Annex Tract

Pursuant to Los Angeles Municipal Code Section 12.20.2, I hereby APPROVE:

a Coastal Development Permit, for the demolition of an existing single-family dwelling and detached accessory structures and the construction, use and maintenance of a new single-family dwelling with attached three-car garage, on property located within the R2-1 Zone, and the Single Permit Jurisdiction and Calvo Exclusion Area of the California Coastal Zone Commission Authority Area of the California Coastal Zone,

upon the following additional terms and conditions:

1. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
2. The use and development of the property shall be in substantial conformance with the plot plan submitted with the application and marked Exhibit "A", except as may be revised as a result of this action.
3. The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective Conditions, if, in the Administrator's opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
4. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

COASTAL COMMISSION



AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

EXHIBIT # 7
PAGE 1 OF 13

"A variance, conditional use, adjustment, public benefit or other quasi-judicial approval, or any conditional approval granted by the Director, pursuant to the authority of this chapter shall become effective upon utilization of any portion of the privilege, and the owner and applicant shall immediately comply with its Conditions. The violation of any valid Condition imposed by the Director, Zoning Administrator, Area Planning Commission, City Planning Commission or City Council in connection with the granting of any action taken pursuant to the authority of this chapter, shall constitute a violation of this chapter and shall be subject to the same penalties as any other violation of this Code."

Every violation of this determination is punishable as a misdemeanor and shall be punishable by a fine of not more than \$2,500 or by imprisonment in the county jail for a period of not more than six months, or by both such fine and imprisonment.

APPEAL PERIOD - EFFECTIVE DATE

The applicant's attention is called to the fact that this authorization is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any Condition of this grant is violated or not complied with, then this authorization shall be subject to revocation as provided in Section 12.27 of the Municipal Code. The Zoning Administrator's determination in this matter will become effective after APRIL 9, 2015, unless an appeal therefrom is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of the Zoning Administrator's action, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. **Forms are available on-line at <http://cityplanning.lacity.org>**. Public offices are located at:

Figueroa Plaza
201 North Figueroa Street,
4th Floor
Los Angeles, CA 90012
(213) 482-7077

Marvin Braude San Fernando
Valley Constituent Service Center
6262 Van Nuys Boulevard, Room 251
Van Nuys, CA 91401
(818) 374-5050

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 12.20.2-J of the Los Angeles Municipal Code, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

Provided no appeal has been filed by the above-noted date, a copy of the permit will be sent to the California Coastal Commission. Unless an appeal is filed with the California Coastal Commission before 20 working days have expired from the date the City's determination is deemed received by such Commission, the City's action shall be deemed final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

COASTAL COMMISSION

There are several public walkways in the neighborhood.

The surrounding area is generally characterized by level topography and residential development to the north, and industrial/commercial development to the south. The properties to the north, west, and east are zoned R2-1, and are predominantly one-and two-story single-family dwellings intermixed with a few two-family dwellings. The west adjoining property is developed with a three-story single-family dwelling. The properties to the south, betwixt Kinney Boulevard and Electric Avenue, are zoned M1-1-O and are occupied by various industrial buildings.

The Council Office was contacted for comment on Thursday, August 28. Any comments will be forwarded to the Zoning Administrator forthwith.

The applicant has submitted a Geotechnical Report dated February 7, 2014.

The Venice Specific Plan sign-off letter has been included in the file. The letter states:

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

- New Construction of one single-family unit not located on a Walkstreet
- Demolition of four or fewer units per a letter dated March 14, 2014, from the Department of Housing and Community Investment, the SFD is an owner-occupied dwelling, and therefore, exempt from the State Mello Act.

Electric Avenue, adjoining the property to the west, is a Local Street, dedicated to a width of 40 feet, and partially improved with asphalt paving and concrete curb, gutter and sidewalk on the west side only.

Electric Court, adjoining the property to the east, is a Local Street, dedicated to a width of 15 feet, and partially improved with concrete paving.

Previous zoning related actions on the site/in the area include:

Subject Property:

Case No. DIR-2014-1215(VSO)(MEL) – On April 9, 2014, the Director of Planning issued a Venice Sign-Off for the demolition of an existing single-family dwelling and the construction of a new three-story single-family dwelling and swimming pool in the side yard. In addition, it was determined that the project was exempt from further Mello Act compliance review.

Surrounding properties:

Case No. ZA 2002-5371(ZV)(SPP)(MEL) – On January 30, 2003, the Zoning Administrator approved a Variance to permit tandem parking for a two-family dwelling in the R2-1 Zone, and the Director of Planning approved a Specific Plan Project Permit Compliance to allow the construction of a two-family dwelling in the R2-1 Zone, at 1628 Electric Avenue.

COASTAL COMMISSION

EXHIBIT # 7
PAGE 3 OF 13

The proposed project at 1620 would be:

42% larger than the average of all structures in the immediate neighborhood

55% larger than the largest SFD

19% larger than the average of the multiple units

76% of the units on the street are one story

24% of the structures have peaked roofs

92% of the structures are under the median of 2,250 sf

This project is 51% above the median house size. The largest SFD on the street is 2,438.

1620 proposes 4,411. It is 19% larger than the average multiplex unit on the street and yet is a SFD.

76% of the existing homes are one story.

Here is the full profile of the current streetscape on Electric Ave.

VENICE BLVD. TO SUPERBA:

Address	# stories	est. height	peaked roof	# units
1698	one	15 feet	yes	one
1694	one	13	yes	one
1690	one	13	yes	one
1686	one	13	yes	one
1682	one	13	yes	one
605 Superba (New Structure. Has CDP. Corner Electric &	two	25	no	one

SUPERBA TO PALMS:

1674	one	15	yes	two
1670	two	27	yes	two
1666	two	27	yes	one
1658-60	one	15	yes	two
1654; 1/2	one	15	yes	two
1650	one	15	yes	one
1644	two	22	no	two
1640	two	27	yes	one
1634	two	25	yes	two
1632	one	13	yes	one
1630	one	13	yes	two
1626-28	three	30 Plus 10'	no	two
1620	one	13	yes	one
1618	one	13	yes	one
1616	one	13	no	one
1612	one	13	yes	one
1608	one	13	no	one
1604	one	13	no	three

COASTAL COMMISSION

I urge you to reject this venture on behalf of concerned residents of Electric Avenue and the wider Venice community.

Arnold Springer, neighbor – August 8, 2014

I would like to know how tall the proposed building is and from where it (the height) is measured?

Part of Electric Ave, its 'east side' is located on a slope because it was built on an artificially elevated and built up railway line. The slope extends from the properties fronting on the west side of Electric towards the lower end which is on the east side, fronting the properties on the east side of Electric.

No one has spoken with me about this project from the applicants side but I live and own property on the street and block. It would be nice to have an informal neighborhood meeting organized to help us know what is proposed and what to expect.

I want to make sure that the height and set-backs proposed for this project do not exceed the guidelines set by the Venice Specific Plan. As well, I want to make sure that the massing and scale of the project is carefully taken into consideration. According to recent decisions of the California Coastal Commission, the massing and scale should be carefully considered in the context of the VSP and the block in which it is proposed to construct same.

Los Angeles Housing and Community Investment Department, Robert Manford, Environmental Affairs Officer – March 14, 2014

HCID determined that there were no affordable units on the property, and that the property has been owner-occupied for the three years prior to March 14, 2014.

PUBLIC HEARING

A Notice of Public Hearing was sent to nearby property owners and/or occupants residing near the subject site for which an application, as described below, had been filed with the Department of City Planning. All interested persons are invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project.

The hearing was held by Jonathan A. Hershey, City Planner, acting in the capacity of a Hearing Officer from the Office of Zoning Administration under Case No. ZA 2014-1550(CDP) and CEQA No. ENV 2014-1549-CE on September 4, 2014, at approximately 9 a.m. in West Los Angeles Municipal Building, Second Floor Hearing Room, 1645 Corinth Avenue, Los Angeles, CA 90025.

The subject site was identified as being located at 1620 East Electric Avenue, zoned R2-1, within the bounds of Council District No. 11, and the Venice Community Plan Area.

The applicant was J. Edward Smith, and was represented by Andy Liu, 10-19 Architecture, Ltd.

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- Example multi-story housing referred to are really minor, rear-yard multi-story buildings.
- Several properties are recorded as multi-story dwellings, but the upper stories are small and set back to the rear portions of the properties.
- Tall multi-story buildings do not characterize this neighborhood.
- There is only one three-story building in this neighborhood.
- The applicant's height analysis is misleading.
- I am an adjacent property owner.
- I have lived in Venice all my life.
- My home is one-story.
- The project will cause me to lose privacy.
- A two-story home would be better for me and the neighborhood.
- I am concerned about the stability of the large cactus on my property; construction activity may destabilize it.
- I am concerned about construction impacts: noise, dust, traffic.
- I have kids who will be affected.
- The project will result in more shading.
- I live within the neighborhood.
- The project is out of scale with the neighborhood.
- The project does not meet requirements of mass, scale, or character.
- The Coastal Commission is concerned about development in the area.
- Neighbors should not have to tell the developer how to build, but to provide feedback about impacts.
- Project will preclude Local Coastal Program because the project changes the character of the neighborhood.
- I am not against development on the property, but I am opposed to what is being proposed.
- There are several active construction projects going on simultaneously.
- We need a pause in construction activity to enjoy some quiet.
- The mass and scale along crescent are at the rear of the properties.
- There is significant on-going construction activity in the neighborhood.

General Comments

- How can projects comply with the Venice Specific Plan when they do not?
- Venice sign-offs do not review projects for neighborhood compatibility. This results in projects which do not meet Specific Plan requirements.
- The applicant and representative are not forthcoming about providing information about the project.

Council Office:

- The Council Office takes no position on this case.
- The applicant should make a greater effort to work with the neighbors to address some of the issues voiced.
- Please help to move this case forward to a quick resolution.

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- 1) That it is in keeping with the mass & scale of the existing neighborhood
- 2) That it has a material affect on the neighboring property regarding light and privacy

Regarding the first issue, the Venice Specific Plan clearly states that a project in the Coastal Zone be compatible in scale & character with the immediate neighborhood.

The applicants have spent some time & effort to prove that they are within the "compatible envelope" of the block they are proposing to build within. However, after careful examination of their presentation at a previous event, I found that their information was slanted towards their point of view. In arguing that their project was in keeping with existing buildings, they included a few aspects that I would consider misleading.

Electric Avenue is very much of a divided street, with residential zone R2-1 on one side and commercial M1-1 on the other. Yet, in their comparisons and arguments they include the industrial buildings as a justification for their own sizing comparisons.

Commercial Side:

[ZA Note: this portion of the letter refers to a pair of photographs showing the industrial development on the opposite side of Electric Avenue. A copy of the photographs is retained in the administrative record.]

Residential Side:

[ZA Note: this portion of the letter refers to a pair of photographs showing the residential development on the same side of Electric Avenue as the project. A copy of the photographs is retained in the administrative record for reference.]

Additionally, when looking at existing buildings on the block, they list 3 other buildings as being 2 or 3 stories. When examined in person to verify, it turns out that at 1634 Electric, there is an obscured back building on the property at 27' height that is totally invisible from the street side:

[ZA Note: this portion of the letter refers to a pair of photographs showing the residential development at 1634 South Electric Avenue and 1640 South Electric Avenue. A copy of the photographs is retained in the administrative record for reference.]

Further on, the "3 story" building at 1654 is a small spire-type building in back of the property primarily composed of a 1-story building:

[ZA Note: this portion of the letter refers to photographs showing the residential development at 1654 South Electric Avenue. A copy of the photographs is retained in the administrative record for reference.]

Similarly, 1674 has a small 2-story building at the back of its property. To try to present these as "in-kind" examples is to deny what this neighborhood is about:

[ZA Note: this portion of the letter refers a photograph showing the residential development at 1674 South Electric Avenue. A copy of the photographs is retained in the administrative record for reference.]

(Racking view of 1674 Electric Ave.):

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To my second point, the Venice specific plan also clearly states that the proposed project should not be materially detrimental to adjoining lots or the immediate neighborhood. In this case, the afore-mentioned 1626 neighboring property, due to its construction, has no eastward-facing windows. Therefore, all of its sunlight comes from either its southern windows (30%) or its western windows (70%) (Please see attachment). This new construction would materially and almost totally block those windows where over 2/3rds of the light in this home is derived. Since both properties would now be above "fence height", mutual privacy issues would ensue, especially seeing as both master bedrooms are at the front of their respective properties and at the same height. I would consider this in total to be "detrimental to an adjoining lot".

In conclusion, I would advocate that a reduction of scale of this project is needed. A 2 story structure, similar to Mr. Lui's previous Manning Ave. or Cushdon Ave. projects would be much more appropriate to the neighborhood, bring a welcome updating and architectural flair to the area and avoid what in his own words is the "dreaded McModern". This project as currently proposed only adds insult to injury and creates the opportunity for this street, an oft-traveled corridor into the heart of Venice to become the next one shouting for relief from over-building.

[ZA Note: A table, entitled "Survey of Window/Light Availability for 1626 Electric Ave." is attached to the communication, without further explanation. A copy of the table is retained in the administrative record for reference.]

[ZA Note: In addition to the written testimony, above, also received into the administrative record was a copy of Case No. DIR 2014-1215-VSO-MEL; selected excerpts from the California Coastal Act; pages from the Venice Local Coastal Program; pages from the Venice Coastal Zone Specific Plan; a copy of Section 11.5.7 of the Los Angeles Municipal Code; and a copy of the Agenda and exhibit information for the September 2, 2014, Venice Neighborhood Council Land Use and Planning Committee Meeting. All of these materials are retained in the administrative record for reference.]

COMMUNICATIONS RECEIVED SUBSEQUENT TO THE PUBLIC HEARING

PCR Services Corporation, Margarita Jerabek, PhD, et al. – February 2015

Historical Resources Assessment and Environmental Impacts Analysis Report (excerpt):

"The Residence appears ineligible for listing under any federal, state or local eligibility criteria. As a result of these investigations, the subject property is assigned a California Historical Resource Status Code of 6Z, "found ineligible for National Register, California Register or local designation through survey evaluation." Therefore, PCR found 1620 Electric Avenue does not qualify as a historical resource under CEQA and the Project would have no direct impact to historical resources on the Project Site. Because 1620 Electric has been identified as a non-contributor to the proposed Milwood Venice Walk Streets Historic District, PCR completed an indirect impacts analysis in the following chapter."

"PCR found the Residence does not qualify as a historical resource under CEQA. Therefore, the Project would have no direct impacts to historical resources on the Project Site. The proposed Project does not materially impair the setting of other historical resources in the project vicinity and meets the Secretary of the Interior's

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By computing the house size on the total square footage of the house, adding all the stories to get a total, one gets the actual extent of the house bulk and mass. We feel this gives a better sense of the scale of the house when used consistently through the entire analysis. The total square footage of this project, 4,411, would yield a coverage of 110% of the lot where the average for the existing homes is 42%.

1620 Electric as proposed will be a three-story, 4,411 sq ft SFD. It shows a slightly slanted roof. It is not compatible with the immediate neighborhood- the east side of Electric from Superba to California - in terms of mass and scale. The developer uses the west side of the street to prove compatibility. It is a commercial area with large lots (lot sizes ranging from 9,000 to 25,000 sf.) but they are mostly one-story buildings, keeping in scale with the residential area across the street. Most of these buildings have their main entrance facing Venice Boulevard and not facing the homes.

House sizes average 1719 sf.; the smallest 850 sf. The next two largest are the multi-units with a sizes of 5410 and 3510 sf. Though having a higher tenant density, they are still smaller than the proposed project. The largest SFD is 2438. 1620 is proposing 4,411 sf.

The proposed project at 1620 would be:
42% larger than average of all structures in the immediate neighborhood;
55% larger than the largest SFD;
and would be 19% larger than the average of multi-units.

92% of the structures are under the median size of 2250 sf; this project would be 51% over the median house size if allowed to be built.

It is not compatible with the neighborhood character:
76% are one-story structures (24% are two or three story)
70% of structures have peaked roofs

The adjacent lots include a 1080 one-story home on a 4013 sf lot and two 1766 sf three-story condos sharing a 3588 sf lot.

There are several duplexes that are within the mass and scale of the block. Interestingly, 25% of the total lots are duplexes, one a triplex (Arnold confirm this) Including the two above, only 5 duplexes out of 13 multi-units are above the median structure size; the others fall around the median size. In addition, they are in the majority one-story structures. 1620 proposes to be a three-story home. It is 19% larger in sq ft than the average multiplex.

One story structures: 76% of the existing homes are one-story (19) and the 24% that are two or three story represent 6 structures.

Peaked Roof: 21 of structures out of 30 have peaked roofs

These are just the statistics, though they tell the story of mass and scale and character, but there are other considerations that the LUP and the VSP require. Articulation of the front facade is one, pedestrian compatibility is another. We believe there is not enough of either. The facade is a single sheer wall, albeit with some wood siding but the bulk is still to the front; step backs relieve the massing and makes for a more human scale inviting to

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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 of 1976.

Lastly, I'd like to add a few things need about this process. I don't know if you can take into account participants' behavior. I hesitate to say the appellants lied but they did misstate many points about this project. As public citizens we do our best to present our concerns but it is made more difficult when you hear misstatements from people who know better or they use intimidation and demeaning words to discourage the public. This man spoke to you saying he is building this home for himself and his family all the while the property was in escrow. I don't know if the Planning Department can do anything about this but it is happening more and more in Venice as developers are paying inflated prices for property. And that is what this is about Tearing apart neighborhoods for the dollar.

The VSP and the LUP exist to prevent this. Please honor these critical documents for Venice and deny the CDP to this project because it is incompatible in mass, scale and character.

ZONING ADMINISTRATOR'S DISCUSSION

Much of the testimony and communication received in opposition to the project cannot be directly addressed within the findings that are required to be made as a part of this request. Issues related to privacy, light/shading, construction-related impacts, landscaping on adjoining properties, and views, while all important aspects of quality of life, are simply not considerations accounted for as a part of the Coastal Development Permit for a project such as being proposed at the subject location.

Testimony has also been received into the administrative record that argues that the project is in violation of the Venice Coastal Zone Specific Plan. The instant request is for a determination concerning conformance with the regulations of the California Coastal Act; it is beyond the purview of this review to re-examine the project's conformance with the Specific Plan in light of a prior determination from the Director of Planning indicating that the project is in compliance. The project is represented to this decision-maker as fully compliant with those regulations, and has been conditioned to be so (Condition No. 8).

MANDATED FINDINGS

In order for a coastal development permit to be granted all of the requisite findings maintained in Section 12.20.2 of the Los Angeles Municipal Code must be made in the affirmative. Following is a delineation of the findings and the application of the facts of this case to same.

1. **The development is in conformity with Chapter 3 of the California Coastal Act of 1976.**

The proposed project is a single-family residence to be built / occupied by the owner to replace a current owner-occupied single-family residence. The project complies with all applicable zoning laws and has been approved for Venice Specific Plan compliance (see attached Venice Sign-off form).

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proposes the demolition of an existing single-family dwelling and the construction of a larger single-family dwelling on property that is zoned for residential use. The project's location results in no impact on scenic or visual qualities of coastal areas or prominent natural landforms; the project proposes to provide all required parking, and could accommodate the equivalent of three additional compact parking stalls between the garage and the alley in the rear yard setback; and the project does not propose to displace a coastal-dependent use development or use. The project is located in an area of potential instability (liquefaction), but local building codes account for this.

- f. **Industrial Development.** The property is presently developed with a residential use, on property located with a zone classification designated for residential uses. Industrial-use lands are located southerly of the property, across Electric Avenue. The proposed demolition and construction of a single-family dwelling has no impact on the location or operation of coastal dependent industrial facilities.

As articulated above, and as conditioned, the development is in conformity with Chapter 3 of the California Coastal Act of 1976.

2. **The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

There is no adopted and certified Local Coastal Program (LCP) for the portion of the California Coastal Zone in which the project is located. While there is a certified Land Use Plan (LUP), there is no accompanying certified Local Implementation Plan (LIP) to carry out the Goals, Objectives, and Policies of the LUP.

For this location, the Venice Coastal Zone Specific Plan implements the Goals, Objectives, and Policies of the Venice Community Plan, which is a portion of the Land Use Element of the City's General Plan. The Venice Community Plan designates the property for Low-Medium Density Residential land uses with corresponding zones of R2, RD3, RD4, RZ3, RZ4, RU, and RW1, and Height District No. 1. The project does not propose any deviation from the requirements or limitations of the underlying zone, nor the requirements or limitations of the Specific Plan. The property is not within the area of any interim control ordinance. The continued use of the property for residential purposes is consistent with the land use designation and the site's zoning. The majority of the surrounding area is developed with single-family dwellings. Therefore, as conditioned, approval of the permit is consistent with others approved by the City and the project is not anticipated to prejudice the ability of the City to prepare a Local Coastal Plan.

3. **The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination. Such Guidelines are designed to provide direction to decision-makers in rendering discretionary determinations on requests for coastal development permits pending adoption of an LCP. In this instance, the Guidelines standards concerning the following are relevant:**

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remainder of the block was characterized by one- and two story dwellings. Full voice has been giving to opposition testimony elsewhere in this determination letter.

The desire for new development to be in relative conformity with existing development in the community is one that is articulated in the certified Venice Land Use Plan, but not yet implemented through a certified Local Implementation Plan. As such, there is no objective standard to determine the character-defining attributes of a community with which to compare new development, nor development controls in place to further limit the size and massing of new development beyond the zoning and Specific Plan.

The Zoning Administrator has compared the project to the Guidelines and found that it is consistent with requirements for building height, setbacks, use, design, and off-street parking associated with the two-family dwelling zoning of the property.

4. **The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.**

The project proposes to demolish an existing single-family dwelling and detached accessory structure and develop a new, larger, three-story-over-basement, approximately 30-foot in maximum height, single-family dwelling. The project is represented as being fully compliant with the requirements and regulations of both the Venice Coastal Zone Specific Plan and the Zoning Code. The applicant has submitted a historic resources assessment which concludes that the project would not adversely impact any surrounding historic resources or any eligible historic districts.

In the recent past, the Coastal Commission has acted to approve several similar residential developments within the Venice community (Application Nos. 5-14-0212, 5-14-0237, 5-14-0239, 5-14-0240, 5-14-0288, 5-14-0523, 5-14-0290, 5-14-0289). In these cases, similar claims of incompatibility between the project's proposed height and the existing community character were argued. The Coastal Commission rejected those arguments inasmuch as there was no adopted document to define or regulate any particular quality of the community which characterizes it. Therefore, the decision to approve this request has been guided by applicable decisions of the California Coastal Commission.

5. **The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

The property is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and is located more than 1/2 mile inland from the beach, having a dozen or more public rights-of-way between the property and the nearest public road to the sea. The single-family residential project proposes to provide all required on-site, off-street parking appropriate for the use, and has been designed such that additional on-site parking

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housing units in the Coastal Zone as mandated by California Government Code Section 65590 (Mello Act) and implemented through the Interim Administrative Procedures.

ADDITIONAL MANDATORY FINDINGS

8. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone C, areas of minimal flooding.
9. On July 11, 2014, the subject project was issued a Notice of Exemption (Subsection c, Section 2, Article II, City CEQA Guidelines), log reference ENV 2014-1551-CE, for a Categorical Exemption, Class 3, Category 1. Article III, Section 1, City CEQA Guidelines (Sections 15300-15333, State CEQA Guidelines). I hereby adopt that action.

Inquiries regarding this matter shall be directed to Jonathan A. Hershey, Planning Staff for the Office of Zoning Administration at (213) 978-1337.



LINN K. WYATT
Chief Zoning Administrator

LKW:JAH:lmc

cc: Councilmember Mike Bonin
Eleventh District
Adjoining Property Owners
Richard A. Rothschild, Western Center on Law and Poverty, Inc.
3701 Wilshire Boulevard, #208
Los Angeles, CA 90010
Susanne Browne, Legal Aid Foundation of L.A.
110 Pine Avenue, #420
Long Beach, CA 90802

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STREET VIEW 1--LOOKING TOWARD SITE FROM ELECTRIC AVE.



STREET VIEW 2--LOOKING ACROSS ELECTRIC AVE FROM SITE



ALLEY VIEW 3--LOOKING TOWARD SITE FROM ELECTRIC COURT (ALLEY)

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Alley View of 2nd Unit of 1634 Electric Avenue as seen from Electric Court (Alley)

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