

CALIFORNIA COASTAL COMMISSION

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F20b

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STAFF REPORT: PERMIT AMENDMENT

Application No.: 5-97-211-A2

Permittee: Caryl Portnoy

Agent: Henry Ramirez

Location: 2707 Ocean Front Walk, Venice, City of Los Angeles (Los Angeles County APN 4226-020-003).

Description of Original Project Approved in 1997: Demolition of a one-story, 1,800 square foot single-family residence, and construction of a three-story, 30-foot high (plus 40-foot high roof access structure), 5,362 square foot single-family residence with a four-car garage on the lower level.

Description of First Amendment Approved in 1998: Revised plans for construction of a three-story, 30-foot high duplex (with 37-foot high roof access structure and elevator housing) with five on-site parking spaces.

Description of Proposed Second Amendment: Request for after-the-fact approval for an approximately 50 square foot addition to an approximately 124 square foot roof access, an approximately 83 square foot rooftop trellis, and changes to the first floor plan, including the deletion of one parking space. In addition, the proposed project includes an interior remodel, a 132 square foot second story addition, a 166 square foot third story addition, two new 52 square foot balconies, a request to amend Special Condition Two of CDP Amendment 5-97-211-A1 to increase the maximum building height for living and storage spaces, a 338 square foot addition to and reconfiguration of the roof access structure and elevator housing into a fourth story living area, and request to amend Special Condition Three of CDP Amendment 5-97-211-A1 to reduce the number of required parking spaces from five to four.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends that the Commission approve a portion of the amendment request and deny the remaining portion as follows:

Approve the Amendment Request for: 1) an interior remodel; 2) the enclosure of the second and third floor decks resulting in an approximately 132 square foot second story addition and a 166 square foot third story addition to the existing three-story, 30-foot high duplex, 3) the construction of two new 52 square foot balconies, 4) revision of Special Condition Three of CDP Amendment 5-97-211-A1 to reduce the number of required on-site parking spaces from five to four; and 5) after-the-fact approval for changes to the original first floor plan, including the deletion of one of five parking spaces.

Deny the Amendment Request for: 1) after-the-fact approval for an approximately 50 square foot addition (storage area) to an approximately 124 square foot roof access structure; 2) after-the-fact approval for an approximately 83 square foot rooftop trellis (extension of roof access structure); 3) revision of Special Condition Two of CDP Amendment 5-97-211-A1 to allow new development to increase the maximum building height of the duplex from 30 feet for a flat roof to 37 feet 11 inches to allow for a fourth story of living and storage space; and 4) the construction of a 338 square foot addition to and reconfiguration of the roof access structure and elevator housing into a fourth story living area.

The Commission must adopt a two-part resolution in order to carry out the staff recommendation. **See Page Five for the motion and resolution.**

The proposed project site is located on a beachfront lot within the North Venice Subarea of the City of Los Angeles, along Ocean Front Walk. Ocean Front Walk is an improved public right-of-way that separates the residential lots from the sands of the public beach. The lot is currently occupied by a three-story, 30-foot high duplex with a 37-foot high roof access structure and elevator house, constructed under the terms of Coastal Development Permit (CDP) Amendment 5-97-211-A1 issued on December 9, 1998. The previous amended permit was issued prior to the Commission's 2001 certification of the Venice Land Use Plan (LUP).

The standard of review for the proposed development is the Chapter 3 policies of the Coastal Act; the Venice LUP policies, however, provide guidance from which the Commission can evaluate the adequacy of the proposed project's mitigation of impacts.

The major issues raised by this proposed development concern consistency with the visual resource and public access policies of the Coastal Act. The applicant is requesting an after-the-fact approval for an addition to and extension of the roof access structure (roof access stairway and elevator enclosure) and approval for a newly proposed expansion of that structure into a fourth story living area. The existing building is a three-story duplex that is already built to the maximum height allowed by the LUP of 30 feet for structures with flat rooflines. Staff is recommending a denial of the requests for the rooftop additions/extensions because this portion of the project will exceed the maximum height limit permitted by the LUP for buildings in the North Venice subarea, and is inconsistent with Section 30251 of the California Coastal Act which requires that the scenic and visual qualities of special coastal communities be protected. Moreover, the Commission-approved

approximately 124 square foot roof access structure already exceeded the maximum 100 square foot limit set forth in the certified LUP. The proposed project would increase the non-conformity of the structure by approving the 50 square foot addition that was constructed without a permit (which resulted in an existing 174 square foot roof access structure), and by adding 338 square feet of living area, all above the height limit set forth in the certified LUP. Approval of the proposed fourth-story additions and expansion of the roof access enclosure and elevator housing would also prejudice the ability of the City to prepare an LCP that conforms to Chapter 3 policies of the Coastal Act because the proposed structure exceeds the 30-foot height limit for flat roofed buildings along Ocean Front Walk in Venice.

The after-the-fact approval request for changes to the original first-floor plan, which would result in deletion of one of five on-site parking spaces is inconsistent with CDP Amendment 5-97-211-A1, which requires for the maintenance of five on-site parking spaces for the duplex. Since the issuance of the previous amendment, however, the Venice LUP has been certified. Due to the changed circumstance, staff recommends approval of the deletion of one on-site parking space because the four existing on-site parking spaces are consistent with the present standards of the certified LUP for substandard and narrow lots such as this and are consistent with Coastal Act policies regarding coastal access. The certified LUP only requires two parking spaces for each dwelling unit on the subject lot.

Commission Staff recommends approval of the amendment request, in part, with **five special conditions**, which: 1) carry forward the requirements of the underlying conditions of the amended coastal development permit; 2) require the applicant to submit revised project plans that reflect the changes to the development plan as a result of Commission action on this permit amendment request; 3) require that all development occur in compliance to the proposal, subject to the conditions herein; 4) resolves any conflict between the terms and conditions imposed by the local government and those of this permit; and 5) requires the applicant remit the balance of the application filing fee. The applicant does not agree with the staff recommendation.

PROCEDURAL NOTE: The Commission's regulations provide for referral of permit amendment requests to the Commission if:

- 1) The Executive Director determines that the proposed amendment is a material change,
- 2) Objection is made to the Executive Director's determination of immateriality, or
- 3) The proposed amendment affects conditions required for the purpose of protecting a coastal resource or coastal access.

If the applicant or objector so requests, the Commission shall make an independent determination as to whether the proposed amendment is material. 14 Cal. Admin. Code 13166.

The amendment request affects the visual resources and public access special conditions imposed by the previous coastal development permit amendment. Thus, the subject application is being forwarded to the Commission because the Executive Director has determined that the proposed amendment is a material change and affects conditions required for the purposes of protecting coastal resources or coastal access.

The applicant originally applied for a new coastal development permit; however, since the proposal requests revisions to the special conditions of a previous permit amendment, an amendment

application is necessary. The proposed amendment is also intended to resolve issues related to unpermitted (after-the-fact) development at the site. Therefore, the Executive Director accepted the amendment request for filing.

Staff Note:

The standard of review for the proposed project is the policies and provisions of the Coastal Act regarding visual resources and public access. **Due to Permit Streamlining Act requirements, the Commission must act upon this permit amendment application at the February 2016 Commission meeting.**

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Appendix A – Substantive File Documents

EXHIBITS

- Exhibit 1 – Project Location
- Exhibit 2 – LUP Exhibit - North Venice
- Exhibit 3 – Proposed Plans

I. MOTION AND RESOLUTION

Staff Recommendation of Approval in Part and Denial in Part

Staff recommends that the Commission adopt the following two-part resolution. The motion passes only by affirmative vote of a majority of the Commissioners present.

Motion:

*I move that the Commission adopt the staff recommendation to **approve-in-part and deny-in-part** Coastal Development Permit Amendment 5-97-211-A, with the approval subject to the conditions set forth in the staff recommendation, by adopting the two-part resolution set forth in the staff report.*

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

Resolution:

Part 1: Approval with Conditions of a Portion of the Amendment Request

The Commission hereby **approves** the portion of the coastal development permit amendment consisting of: **1) an interior remodel; 2) the enclosure of the second and third floor decks resulting in an approximately 132 square foot second story addition and a 166 square foot third story addition to the existing three-story, 30-foot high duplex, 3) the construction of two new 52 square foot balconies, 4) revision of Special Condition Three of CDP Amendment 5-97-211-A1 to reduce the number of required on-site parking spaces from five to four; and 5) after-the-fact approval for changes to the original first floor plan, including the deletion of one of five parking spaces** on the grounds that the development, as amended and subject to conditions, will be in conformity with the policies of Chapter 3 of the Coastal Act. 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.

Part 2: Denial of the Remainder of the Amendment Request

The Commission hereby **denies** the portion of the coastal development permit amendment consisting of: **1) after-the-fact approval for an approximately 50 square foot addition to an approximately 124 square foot roof access structure; 2) after-the-fact approval for an approximately 83 square foot rooftop trellis (extension of roof access structure); 3) revision of Special Condition Two of CDP Amendment 5-97-211-A1 to allow new development to increase the maximum building height of the duplex from 30 feet for a flat roof to 37 feet 11 inches to allow for a fourth story of living and storage space; and 4) the construction of a 338 square foot addition to and reconfiguration of the roof access structure and elevator housing into a fourth story living area** on the grounds that the development, as amended, will not conform with the policies of Chapter 3 of the Coastal Act. Approval of the amendment would not comply

with the California Environmental Quality Act because there are feasible mitigation measures or alternatives that would substantially lessen the significant adverse impacts of the amended 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. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
3. **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.
4. **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

NOTE: Special Conditions One through Three approved by the Commission in its prior action on Permit Amendment 5-97-211-A1 continue to apply; however, modifications are recommended to Special Condition Three, as identified by ~~strikeout~~ and **bold** below. Special Condition Four through Seven are imposed by the approval of this Permit Amendment, 5-97-211-A2.

1. **Number of Units.** The permitted use of the approved structure is limited to a duplex (two residential units).
2. **Height.** The height of the roof shall not exceed thirty feet above the centerline of the Ocean Front Walk right-of-way. Only roof deck railings, parapet walls, chimneys, air conditioning equipment, solar collectors, skylights, one elevator housing and one roof access structure with no living or storage area may extend above the thirty foot roof height limit (as shown on the approved plans). No portion of the structure shall extend more than 40 feet above the centerline of the Ocean Front Walk right-of-way.
3. **Parking.** A minimum of **four** ~~five~~ parking spaces shall be provided and maintained on the site.
4. **Revisions to Plans to Conform With the Changes to the Development Authorized by Permit Amendment 5-97-211-A2.**
 - a. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT AMENDMENT, 5-97-211-A2, the applicant shall submit, for the review and approval of

the Executive Director, revised project plans which shall only show the development on the subject parcel (APN 4226-020-003) which has been approved pursuant to this amended permit and which shall not show the following development:

- (i) as-built approximately 83 square foot rooftop trellis;
- (ii) as-built approximately 50 square foot addition to roof access enclosure and elevator housing; and,
- (iii) the proposed approximately 338 square foot addition to the roof access enclosure and elevator housing.

5. **Approved Development - Permit Compliance.** All development must occur in strict compliance with the plans approved by the Commission, subject to the special conditions. Any proposed change or deviation from the approved plans shall be submitted to the Executive Director to determine whether an amendment to this permit is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations. No changes to the approved plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.
6. **Local Government Approval.** The proposed development is subject to the review and approval of the local government (City of Los Angeles). This action has no effect on conditions imposed by a local government pursuant to an authority other than the Coastal Act, including the conditions of the City of Los Angeles Department of City Planning Case No. ZA 2014-0407. In the event of conflict between the terms and conditions imposed by the local government and those of this coastal development permit, the terms and conditions of Coastal Development Permit Amendment No. 5-97-211-A2 shall prevail.
7. **Application Fee.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT AMENDMENT, the applicant shall pay the balance of the application fee for after-the-fact development, which equals \$15,512.

IV. 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 subject 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 subject project site is located within the *Dual Permit Jurisdiction Area*. The proposed building additions were reviewed and approved by the City of Los Angeles pursuant to Local Coastal Development Permit No ZA 2014-0407-CDP.

V. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION AND LOCATION

The applicant is requesting after-the-fact approval for (1) an approximately 50 square foot addition (storage area) to an approximately 124 square foot roof access structure, (2) an approximately 83

square foot rooftop trellis, and (3) changes to the first-floor plan, including the deletion of one of five on-site parking spaces (**Exhibit 3**). The applicant is also proposing new development, including (1) the enclosure of the second and third floor decks resulting in an approximately 132 square foot second story addition and a 166 square foot third-story addition to the existing three-story, 30-foot high duplex, (2) an interior remodel, and (3) the construction of two new 52 square foot balconies (**Exhibit 3**). Moreover, the proposed project includes a request to amend Special Condition Two of CDP Amendment 5-97-211-A1 to increase the maximum building height of the duplex from 30 feet for a flat roof to 37 feet 11 inches to allow for a fourth story of living and storage space. The proposed fourth story involves a 338 square foot addition to and reconfiguration of the roof access structure and elevator housing that would create habitable space above the LUP's height limit (**Exhibit 3**). The applicant also requests an amendment of Special Condition Three of CDP Amendment 5-97-211-A1 in order to reduce the required parking spaces from five to four.

The project site is a 2,520 square foot oceanfront lot in North Venice along Ocean Front Walk, in a subarea designated for Multi-Family Residential – Low Medium II (**Exhibit 1 and 2**). Ocean Front Walk is an improved public right-of-way that separates the residential lots from the sands of the public beach. The beach and the beach bike path are located in front of the proposed project on the seaward side of Ocean Front Walk. The lot is currently occupied by a three-story, 30-foot high duplex with a 37-foot high roof access structure and elevator house, constructed under the terms of Coastal Development Permit Amendment 5-97-211-A1. Coastal development permit 5-97-211-A1 was issued on December 9, 1998.

The existing duplex has been constructed consistent with the plans approved by Coastal Development Permit 5-97-211-A1, with the exception of an approximately 50 square foot addition to the roof access enclosure used as storage space, an approximately 83 square foot rooftop trellis, and changes to the first-floor plan resulting in four on-site parking spaces instead of five.

B. PROJECT HISTORY

On September 9 1997, the Commission's original approval of Coastal Development Permit (CDP) 5-97-211 permitted the demolition of a one-story single-family residence and the construction of a three-story 30-foot high, approximately 5,362 square foot *single-family residence* with a 40-foot high roof access structure and a four-car garage. On December 9, 1998, the Commission approved CDP Amendment 5-97-211-A1 to revise the project; this amendment permitted the construction of a three-story, 30-foot high *duplex* with a 37-foot high roof access structure and elevator house, and required five on-site parking spaces. Amendment 5-97-211-A1 was required to change the special conditions and project description (*duplex* instead of a *single-family residence*) of CDP 5-97-211; as a result, the special conditions of the underlying permit (CDP 5-97-211) were replaced with the special conditions of Amendment 5-97-211-A1.

Presently, the applicant is requesting to expand the duplex and amend Special Condition Two and Special Condition Three imposed under CDP Amendment 5-97-211-A1 in order to revise the height limit and number of required on-site parking spaces.

Special Condition Two of Coastal Development Permit Amendment 5-97-211-A1, states:

The height of the roof shall not exceed thirty feet above the centerline of the Ocean Front Walk right-of-way. Only roof deck railings, parapet walls, chimneys, air conditioning equipment, solar collectors, skylights, one elevator housing and one roof access structure with

no living or storage area may extend above the thirty foot roof height limit (as shown on the approved plans). No portion of the structure shall extend more than 40 feet above the centerline of the Ocean Front Walk right-of-way.

Special Condition Three of Coastal Development Permit Amendment 5-97-211-A1, states:

A minimum of five parking spaces shall be provided and maintained on the site.

On January 7, 2015, the City of Los Angeles Office of Zoning Administration approved with conditions Local CDP No. ZA 2014-0407, which authorized the expansion of the existing duplex in the manner sought by this amendment application. The Local CDP was approved in conjunction with a Specific Plan Project Permit Adjustment to permit a height of 37 feet 11 inches in lieu of the maximum 30 feet permitted for a structure with a flat roof. The action was not appealed at the local level. In addition, the Venice Neighborhood Council, an advisory board, recommended approval for the duplex expansion and height adjustment.

C. VISUAL RESOURCES/COMMUNITY CHARACTER

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....

The protection of visual quality and 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.

The Commission has recognized in both prior permit and appeal decisions that the North Venice area is a special coastal neighborhood. In order to protect community character and visual quality in the North Venice area, the Commission has consistently limited residential structural height. The standard of review is the Chapter 3 policies of the Coastal Act. While the certified Venice Land Use Plan (LUP) (certified by the Commission in 2001) is not the standard of review, the LUP policies provide guidance from which the Commission can evaluate the adequacy of a project's mitigation of impacts. The Commission's building standards for the North Venice area are contained in the certified Venice LUP and, previously, in the adopted Regional Interpretive Guidelines for Los Angeles County (adopted in 1980).

The applicant is proposing the enclosure of the second and third floor decks resulting in an approximately 132 square foot second story addition and a 166 square foot third story addition to the existing three-story, 30-foot high duplex, an interior remodel, and the construction of two new 52 square foot balconies (**Exhibit 3**). These components will be attached to the front of the structure, will not be more visible than the existing structure, will not increase the height of the building, and will not encroach into or over the fronting public-right-way, Ocean Front Walk. With

these components of the proposal, the existing duplex will still be consistent with the character and scale of the development in the surrounding area, will be designed to assure structural integrity, and will avoid cumulative adverse impacts on visual resources and public access. Therefore, the Commission finds that the proposed approximately 298 square foot second and third-floor addition and new balconies, as conditioned, conform with Section 30251 of the Coastal Act.

The request for approval of additional rooftop development that exceeds the height limit and is visible from public areas (e.g., the boardwalk and beach), however, would negatively impact visual resources. The applicant is requesting an after-the-fact approval for an approximately 50 square foot addition (storage area) to an approximately 124 square foot roof access structure, and an approximately 83 square foot rooftop trellis. Moreover, the proposed project includes a request to amend Special Condition Two of CDP Amendment 5-97-211-A1 to increase the maximum building height of the duplex from 30 feet for a flat roof to 37 feet 11 inches to allow for a fourth story of living and storage space. The proposed fourth story involves a 338 square foot addition to and reconfiguration of the roof access structure into habitable space (**Exhibit 3**). The Commission's prior approval of the structure only allowed a small roof access structure to exceed the 30-foot height limit, with no living or storage space allowed above 30 feet (Special Condition Two of Coastal Development Permit Amendment 5-97-211-A1).

The Commission typically limits new development in the North Venice area to a height of 30 feet for structures with flat rooflines. The LUP allows a maximum height of 30 feet for structures with a flat roofline and 35 feet for structures with a varied or sloped roofline in this area. The Commission has also allowed portions of some structures to exceed the 30-foot height limit by up to 10 feet if the scenic and visual qualities of the area are not negatively impacted. Structures allowed to exceed the maximum building height are limited to roof deck railings, parapet walls, chimneys, air conditioning equipment, solar collectors, skylights, one elevator housing and one roof access structure with no living or storage area. The 30-to-35-foot height limit set forth in the certified Venice LUP also protects community character from over-sized structures that would loom over the boardwalk and other public areas. Some flat-roofed structures have been permitted to reach up to 35 feet high, the same but not beyond the height limit that applies to structures with a varied or sloped rooflines. However, the LUP policies regarding building height specifically do not allow for any living area or storage area above the maximum height of 35 feet (with a sloped or varied roofline). This proposal includes living area and storage space (a fourth floor) that reaches nearly 38 feet in height. Approval of a fourth floor would set a negative precedent for development in the North Venice area. For instance, the adjoining southern lot is currently vacant and owner of the may request similar development. Many beach front homes have roof decks with small stairway enclosures that exceed the roof height limit. Enlargement of these small building extensions into new fourth floors (and even higher roof decks) would have major adverse cumulative impacts on public views and community character.

Policy I. A. 1.a Residential Development of the Certified Venice Land Use Plan states, in part:

Roof Access Structures. *Building heights and bulks shall be controlled to preserve the nature and character of existing residential neighborhoods. Residential structures may have an enclosed stairway (roof access structure) to provide access to a roof provided that:*

- i. The roof access structure shall not exceed the specified flat roof height limit by more than 10 feet;*
- ii. The roof access structure shall be designed and oriented so as to reduce its visibility from adjacent public walkways and recreation areas;*
- iii. The area within the*

outside walls of the roof access structure shall be minimized and shall not exceed 100 square feet in area as measured from the outside walls...

The existing duplex has a flat roofline with a height of 30 feet; the roof contains parapet walls, roof deck railings, roof equipment, skylights, and an elevator and roof access stairway enclosure. The highest part of the existing structure is the roof access structure, which extend to 37 feet above the fronting right-of-way (**Exhibit 3**).

The City of Los Angeles Venice Specific Plan (VSP), which the Commission has not certified, also limits building heights in the North Venice area to 30 feet for flat rooflines. The City may grant exceptions to its height limit for specific parts of structures like chimneys, roof equipment, roof access structures, deck railings, parapet walls, and skylights. In this case, however, the City granted a Specific Plan Project Permit Adjustment permitting a height of 37 feet 11 inches in lieu of the maximum 30 feet permitted for a project with a flat roof to allow for the proposed duplex fourth-story expansion.

The Commission must determine whether the proposed project conforms to the visual resource policies contained in Section 30251 of the Coastal Act. Section 30251 of the Coastal Act requires that the scenic and visual qualities of coastal areas shall be considered and protected. In this case, the size of the proposed fourth story addition would adversely affect visual resources and community character, and is recommended that it be denied.

As previously stated, the Commission has allowed portions of some structures to exceed the 30-foot height limit by up to 10 feet if the scenic and visual qualities of the area are not negatively impacted. The portions of structures which have been previously allowed to exceed the 30-foot height limit include parapet walls and railings around roof decks, chimneys, air conditioning equipment, skylights, and roof access structures. Such rooftop structures are supposed to be sited on the roof in a manner which minimizes their visibility from Ocean Front Walk and the public beach. Roof access structures have been permitted to exceed the 30-foot height limit only if they contain no living or storage space and if they do not negatively impact the visual resources of the area.

As proposed, the request for the after-the-fact approval of a 50 square foot addition and a rooftop trellis, and the request for approval of a new approximately 338 square foot addition (total of 388 square feet) and conversion of the existing approximately 174 square foot roof access enclosure into a fourth story habitable area do not adequately protect the visual resources along Venice Beach. The proposed fourth story does not comply with the visual resource policies of the Coastal Act because it does not minimize the bulk of the rooftop structures that can be seen from the beach. In addition, the seaward fourth-story addition reduces the set back of the roof access structure and lessens the intent of the previously approved permit and amendment.

Special Condition Two of Coastal Development Permit Amendment 5-97-211-A1, states:

The height of the roof shall not exceed thirty feet above the centerline of the Ocean Front Walk right-of-way. Only roof deck railings, parapet walls, chimneys, air conditioning equipment, solar collectors, skylights, one elevator housing and one roof access structure with no living or storage area may extend above the thirty foot roof height limit (as shown on the

approved plans). No portion of the structure shall extend more than 40 feet above the centerline of the Ocean Front Walk right-of-way.

Special Condition Two of CDP Amendment 5-97-211-A1 was imposed to limit the roof height of the duplex to 30 feet above the centerline of the Ocean Front Walk right-of-way and to ensure consistency with the Coastal Act's visual resource policies. The condition also limited what structures were allowed to exceed the 30-foot height limit. Pursuant to Special Condition Two referenced above, living and storage area and building extensions like trellises are not permitted beyond the height limit. Consequently, the approximately 388 square foot addition and conversion of the existing approximately 174 square foot roof access enclosure and elevator housing into a fourth story living area does not conform to the terms and conditions of the underlying permit.

In addition, roof access structures have typically been limited to a maximum of 100 square feet in area as measured from the outside walls by the Commission. In 1998, when the applicant received a coastal development permit amendment permitting the construction of the existing duplex, the applicant received an exception from the Commission to construct an approximately 124 square foot roof access structure in lieu of the typically imposed 100 square foot maximum. Subsequent to the issuance of the previous CDP Amendment (5-97-211-A1), the Venice LUP was certified in 2001. The LUP addresses building heights and roof access structures by limiting them to 100 square feet in area as measured from the outside walls (see LUP Policy I. A. 1.a above).

Since the certification of the LUP, the Commission has been more consistent in allowing restricting access structures to the 100 square foot in area requirement. Therefore, the existing and Commission-approved roof access structure is a non-conforming structure. The applicant is now requesting an after-the-fact approval for an addition to the roof access structure and is requesting to further expand the roof access structure, which will only increase the structure's non-conformity with the policies of the LUP and, consequently, it's inconsistency with the visual resource policies of the Coastal Act.

Staff is recommending that the Commission deny the after-the-fact rooftop trellis, and proposed additions and expansion of the roof access enclosure because this portion of the project will exceed the maximum height limit permitted by the City's Certified Land Use Plan for buildings located in the North Venice subarea and is inconsistent with Section 30251 of the California Coastal Act. Approval of the rooftop additions and expansion of the roof access structure would also prejudice the ability of the City to prepare an LCP that conforms to Chapter 3 policies of the Coastal Act because the proposed structure exceeds the 30-to-35-foot height limit for buildings along Ocean Front Walk in Venice and would make it more difficult to prepare an LCP that adequately protects visual resources and community character.

D. PUBLIC ACCESS

The Commission has consistently found that a direct relationship exists between residential density, the provision of adequate parking, and the availability of public access to the coast. Section 30252 requires that new development should maintain and enhance public access to the coast by providing adequate parking facilities.

Section 30252 of the Coastal Act states, in part:

The location and amount of new development should maintain and enhance public access to the coast by ... (4) providing adequate parking facilities...

Previously, because of concerns regarding parking shortages and potential negative impacts to public coastal access, the Commission consistently conditioned new development within the North Venice area to provide two parking spaces per residential unit and provide one guest parking space. The intention was to minimize impacts to the parking supply in Venice and the surrounding residential neighborhoods, where parking demand may overlap with beach parking demand.

The current parking requirement for the duplex is five on-site parking spaces. The Commission required five vehicle on-site parking spaces through Special Condition Three of the previous CDP Amendment (5-97-211-A1) because the project site's proximity to the beach and to the Venice fishing pier; the special conditions of the underlying permit (CDP 5-97-211) were replaced with the conditions of the first amendment. The applicant is requesting after-the-fact approval for a reduction in parking spaces from five to four spaces.

Following issuance of CDP Amendment 5-97-211-A1, the applicant constructed the duplex with changes to the first floor plan, resulting in the deletion of one of five parking spaces. The action was inconsistent with the conditions of the approved CDP Amendment 5-97-211-A1.

Special Condition Three of Coastal Development Permit Amendment 5-97-211-A1, states:

A minimum of five parking spaces shall be provided and maintained on the site.

Subsequent to the Commission's action on the previous amendment, however, the Venice LUP was certified. During its review of the LUP, the Commission comprehensively analyzed potential adverse impacts to public access and determined that providing two parking spaces per unit complied with the Coastal Act policies regarding public access. The certified LUP only requires two parking spaces for each dwelling unit on the subject lot because the lot is less than 35 feet wide. Therefore, the resulting four on-site parking spaces are consistent with the present standards of the certified LUP.

Therefore, Staff is recommending that the Commission approve the request for an after-the-fact approval of the deletion of one on-site parking space which will continue to maintain, enhance, and protect public access pursuant to Section 30251 and Section 30252 of the Coastal Act. Special Condition Three of amended Coastal Development Permit 5-97-211 is revised to as follows:

A minimum of four parking spaces shall be provided and maintained on the site.

E. UNPERMITTED DEVELOPMENT

The proposed project site is currently occupied by a three-story, 30-foot high duplex with a 37-foot high roof access structure and elevator house, which has been constructed under the terms of Coastal Development Permit Amendment 5-97-211-A1. Coastal development permit 5-97-211-A1 was issued on December 9, 1998.

The existing duplex has been constructed inconsistent with the plans approved by Coastal Development Permit 5-97-211-A1 because of an added approximately 50 square foot of storage area to the roof access enclosure, the addition of an approximately 83 square foot rooftop trellis, and

changes to the first-floor plan resulting in four parking spaces on-site instead of five. Therefore, unpermitted development has occurred on site. Despite this unpermitted development, though, consideration of the amendment request by the Commission is based solely upon the public access and visual resources policies of the Coastal Act, with guidance from the policies of the certified LUP.

This amendment request was submitted by the applicant in response to communication with Commission Staff after submitting a coastal development permit application for an interior remodel and expansion of the existing duplex. Since the proposal includes a request to revise the special conditions of a previous permit amendment, an amendment application was necessary.

The applicant is not proposing to remove any of the unpermitted development. The Commission's enforcement division will evaluate further actions to address this matter. The amendment request, however, is intended to resolve some of the issues related to unpermitted development at the site. Therefore, Special Conditions are imposed to ensure the proposed amendment's consistency with the visual resources and public access policies of the Coastal Act.

Special Condition Four of this amendment requires the applicant to submit revised plans, for the review and approval of the Executive Director, showing that all rooftop improvements, including the 83 square foot trellis, the 50 square foot addition already constructed, and the proposed 338 square foot addition to the roof access structure are deleted from the final plans. **Special Condition Five** is imposed to ensure that all development occur in compliance to the proposal, subject to the conditions herein.

APPLICATION FILING FEE FOR AFTER-THE-FACT DEVELOPMENT

The applicant is requesting to amend special conditions of a previous permit; therefore, the submittal of amendment application was necessary. On August 18, 2015, the applicant submitted a check in the amount \$1,108, with the intention of applying for an immaterial amendment. Upon further review of the submitted project plans, it was determined that the duplex was constructed inconsistent with the original permit and contained unpermitted development. According to the applicant's representative, the applicant agreed in November 2015 to make revisions to the proposal to resolve the issues concerning the unpermitted development. Staff originally intended to schedule this item in December 2015 as an Immaterial Amendment. The applicant later decided, however, to not make the necessary changes to resolve the unpermitted development. Staff has continued to work on addressing the issues, but determined that the proposed amendment is a material change and affects conditions required for the purposes of protecting coastal resources or coastal access.

Unpermitted development has occurred at the project site subject to this coastal development permit amendment application. Any non-exempt development activity conducted in the Coastal Zone without a valid coastal development permit, or which does not substantially conform to a previously issued permit, constitutes a violation of the Coastal Act.

The applicant is proposing after-the-fact approval of the unpermitted development noted above and described in more detail in the project description. Although the development has taken place prior to submittal of this application, consideration of this application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act.

Section 30620 of the Coastal Act states, in relevant part:

The Commission may require a reasonable filing fee and the reimbursement of expenses for the processing by the Commission of any application for a coastal development permit...

Section 13055 of the California Code of Regulations sets the filing fees for coastal development permit applications, and states in relevant part:

(d) Fees for an after-the-fact (ATF) permit application shall be five times the amount specified in section (a) unless such added increase is reduced by the Executive Director when it is determined that either:

(1) the ATF permit application can be processed by staff without significant additional review time (as compared to the time required for the processing of a regular permit,) or

(2) the owner did not undertake the development for which the owner is seeking the ATF permit, but in no case shall such reduced fees be less than double the amount specified in section (a) above. For applications that include both ATF development and development that has not yet occurred, the ATF fee shall apply only to the ATF development. In addition, payment of an ATF fee shall not relieve any persons from fully complying with the requirements of Division 20 of the Public Resources Code or of any permit granted thereunder or from any penalties imposed pursuant to Chapter 9 of Division 20 of the Public Resources Code.

(i) The required fee shall be paid in full at the time an application is filed. However, applicants for an administrative permit shall pay an additional fee after filing if the executive director or the commission determines that the application cannot be processed as an administrative permit. The additional fee shall be the amount necessary to increase the total fee paid to the regular fee. The regular fee is the fee determined pursuant to this section. In addition, if the executive director or the commission determines that changes in the nature or description of the project that occur after the initial filing result in a change in the amount of the fee required pursuant to this section, the applicant shall pay the amount necessary to change the total fee paid to the fee so determined. If the change results in a decreased fee, a refund will be due only if no significant staff review time has been expended on the original application. If the change results in an increased fee, the additional fee shall be paid before the permit application is scheduled for hearing by the commission. If the fee is not paid prior to commission action on the application, the commission shall impose a special condition of approval of the permit. Such special condition shall require payment of the additional fee prior to issuance of the permit.

Subsection (d) of California Code of Regulations Section 13055 indicates that the fee for an after-the-fact permit application shall be five times the amount otherwise required, unless reduced by the Executive Director for specified reasons. An after-the-fact permit is a permit involving any non-exempt development activity conducted in the Coastal Zone without a valid coastal development permit, or which does not substantially conform to a previously issued permit.

Based on the filing fee schedule for the 2014/2015 fiscal year, the permitting fee for residential projects between 5,001 and 10,000 square feet is \$6,648. The Material Amendment fee is calculated as 50% of the fee applicable to the underlying permit if it were submitted today. Fifty percent (50%) of this fee is \$3,324. Five times the fee of \$3,324 is \$16,620.

Because the applicant has already paid \$1,108, **Special Condition Seven** requires the applicant to pay the balance of \$15,512 prior to issuance of the permit, consistent with the requirements of California Code of Regulations Section 13055(i).

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. The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The City of Los Angeles Land Use Plan (LUP) for Venice was effectively certified on June 14, 2001. The Commission's standard of review for the proposed development is the Chapter 3 policies of the Coastal Act. The certified Venice LUP is advisory in nature and may provide guidance.

As conditioned, the proposed enclosure of the second- and third- floor decks for an approximately 298 square foot addition to the duplex, interior remodel, construction of two new 52 second- and third- floor balconies, and the reduced number of parking spaces from five to four is consistent with Chapter 3 of the Coastal Act. As a result of this portion of the proposed project's consistency with the Coastal Act and the certified LUP for Venice, approval of this portion of the project will not prejudice the City of Los Angeles' ability to prepare an LCP that is consistent with Chapter 3 of the Coastal Act.

In contrast, the proposed request for the after-the-fact approval of and newly proposed expansion and reconfiguration of the roof access structure into a fourth-story living area is inconsistent with Chapter 3 of the Coastal Act. The proposed fourth story will exceed the maximum height limit permitted by the City's Certified Land Use Plan for buildings located in the North Venice subarea and is inconsistent with Section 30251 of the California Coastal Act which requires that the scenic and visual qualities of special coastal communities be protected. Approval of the rooftop addition and expansion of the roof access enclosure and elevator housing would also prejudice the ability of the City to prepare an LCP that conforms to Chapter 3 policies of the Coastal Act because the proposed structure exceeds the 30-foot height limit for buildings with flat roofs along Ocean Front Walk in Venice by approximately 8 feet. As a result of the proposed project's inconsistency with the Coastal Act and the certified LUP for Venice, approval of this project will prejudice the City of Los Angeles' ability to prepare an LCP that is consistent with Chapter 3 of the Coastal Act.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

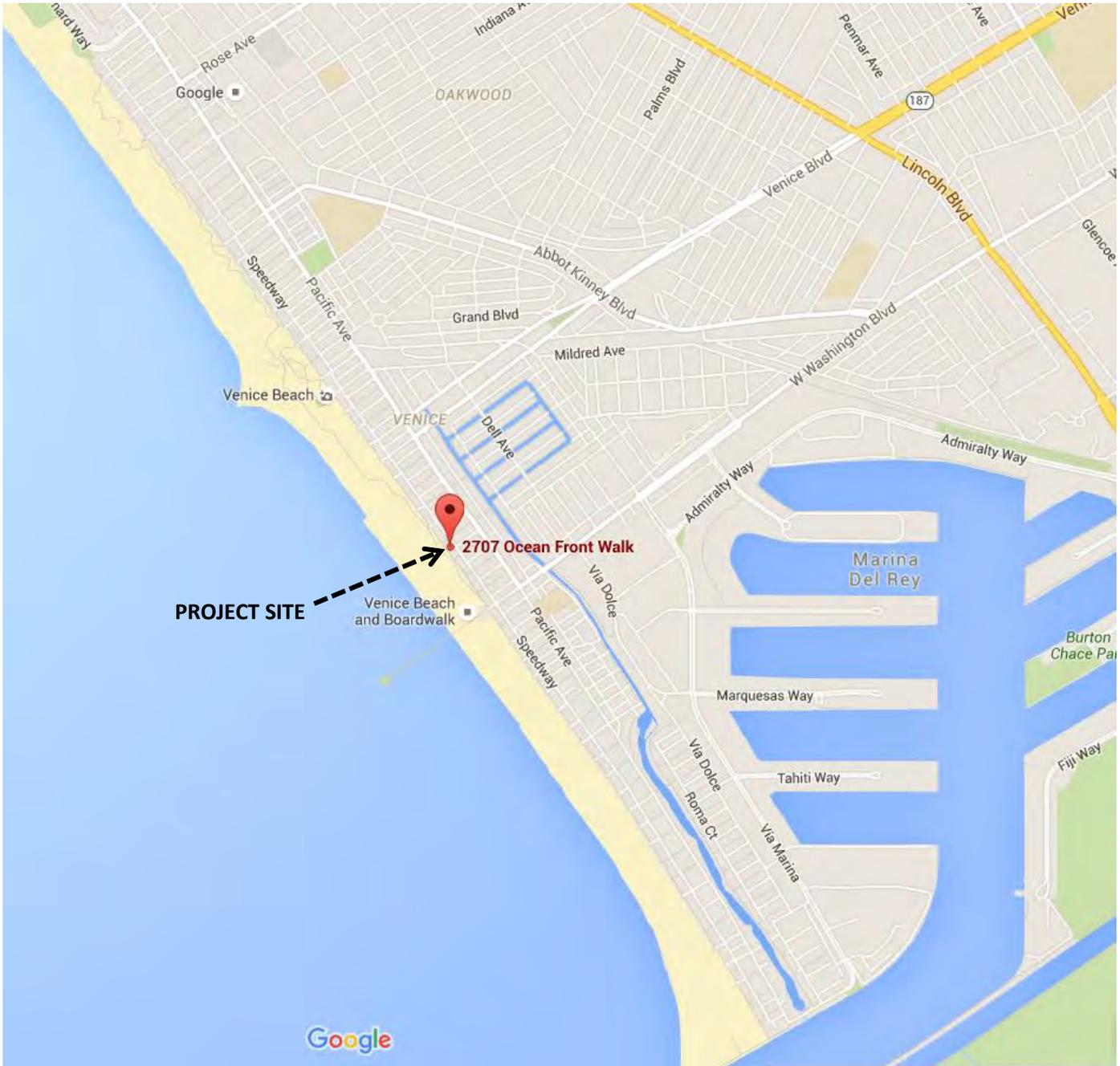
Section 13096 of the California Code of Regulations requires Commission approval of coastal development permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental 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.

In this case, the City of Los Angeles is the lead agency and the Commission is the responsible agency for the purposes of CEQA. The City of Los Angeles issued Negative Declaration No. ENV-2014-0408-MND for the project on April 28, 2014.

The Commission finds that the portion of the proposed project that will be approved by this amendment, as conditioned, will not have any significant adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970. In addition, the Commission finds that the portion of the proposed project that will be denied by this amendment would result in potentially significant adverse effects on the environment, including visual and aesthetic resources, within the meaning of the California Environmental Quality Act. Therefore, by denying a portion of the project proposed by this amendment, the Commission has approved a feasible alternative and/or mitigation measure that substantially lessens a potentially significant aspect of the project as proposed. As conditioned, the project has been adequately mitigated and is consistent with the policies of the Coastal Act and conform to CEQA.

Appendix A – Substantive File Documents

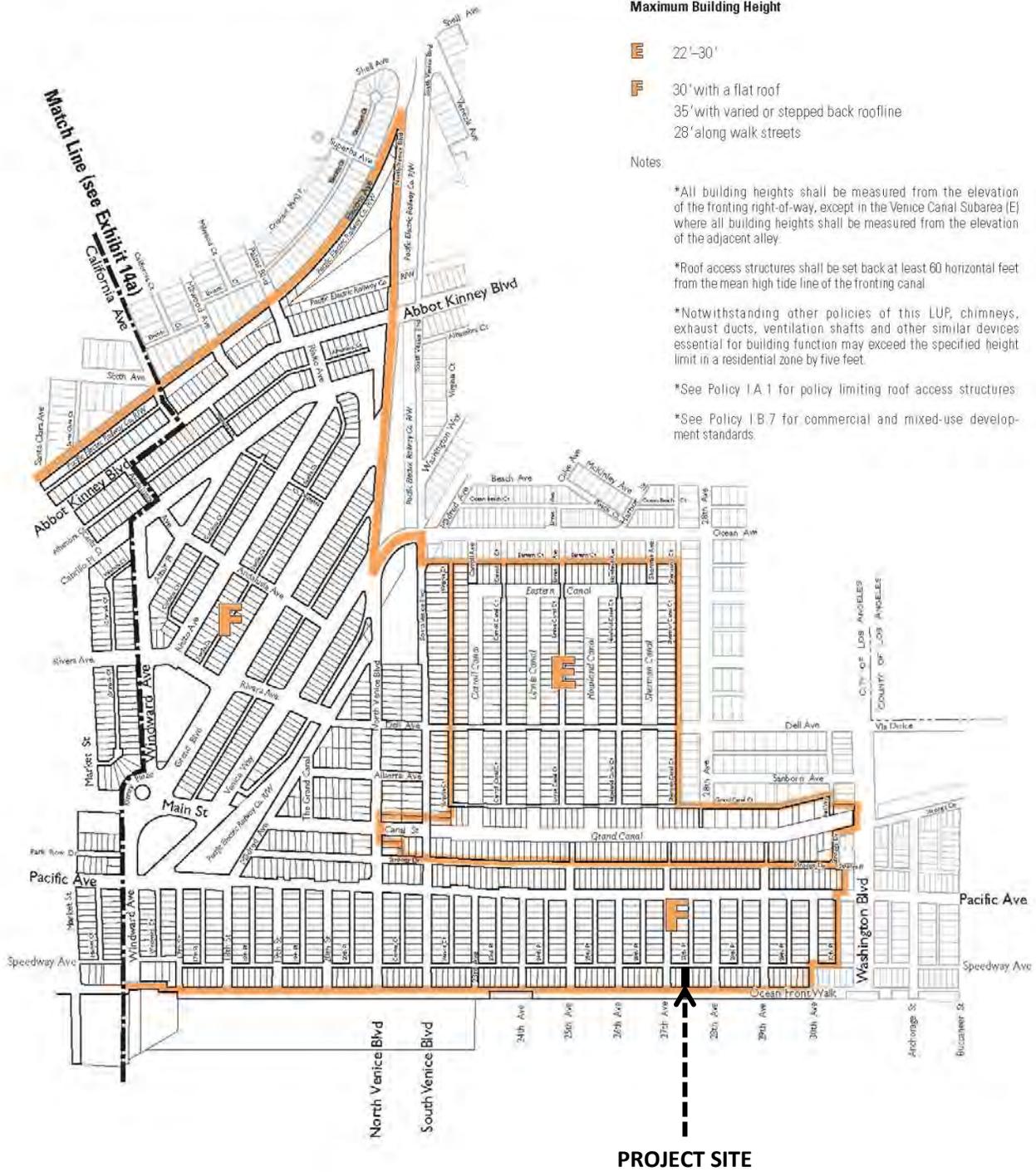
1. City of Los Angeles certified Land Use Plan for Venice, 6/14/2001.
2. City of Los Angeles Local Coastal Development Permit No. ZA 2014-0407
3. City of Los Angeles Negative Declaration No. ENV-2014-0408-MND, 4/28/2014.
4. Coastal Development Permit No. 5-97-211
5. Coastal Development Permit Amendment No. 5-97-211-A1



COASTAL COMMISSION

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VENICE LUP POLICIES (certified by the Coastal Commission June 14, 2001)



Maximum Building Height

-  22'-30'
-  30' with a flat roof
35' with varied or stepped back roofline
28' along walk streets

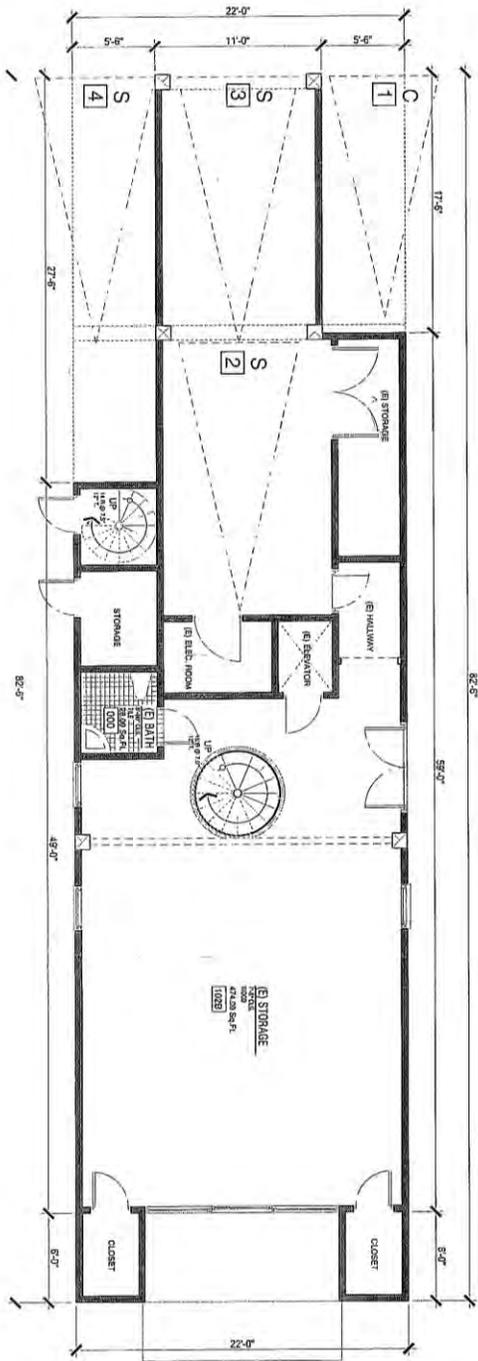
Notes

- *All building heights shall be measured from the elevation of the fronting right-of-way, except in the Venice Canal Subarea (E) where all building heights shall be measured from the elevation of the adjacent alley.
- *Roof access structures shall be set back at least 60 horizontal feet from the mean high tide line of the fronting canal.
- *Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.
- *See Policy IA.1 for policy limiting roof access structures.
- *See Policy I.B.7 for commercial and mixed-use development standards.

Exhibit 14b
Height
Subarea: North Venice • Venice Canals

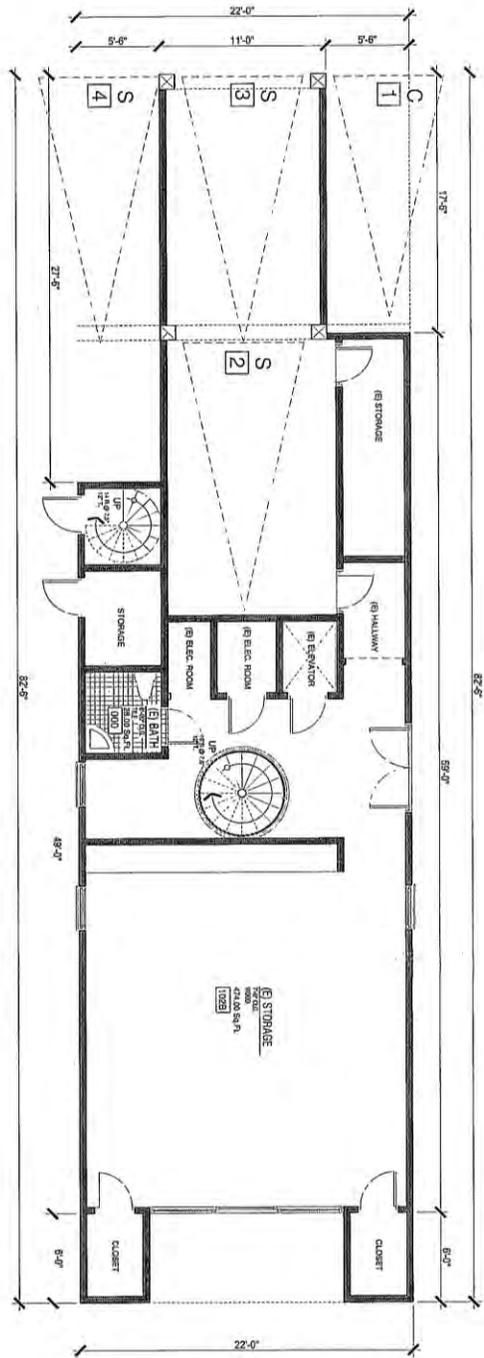


COASTAL COMMISSION



(N) BASEMENT PLAN

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

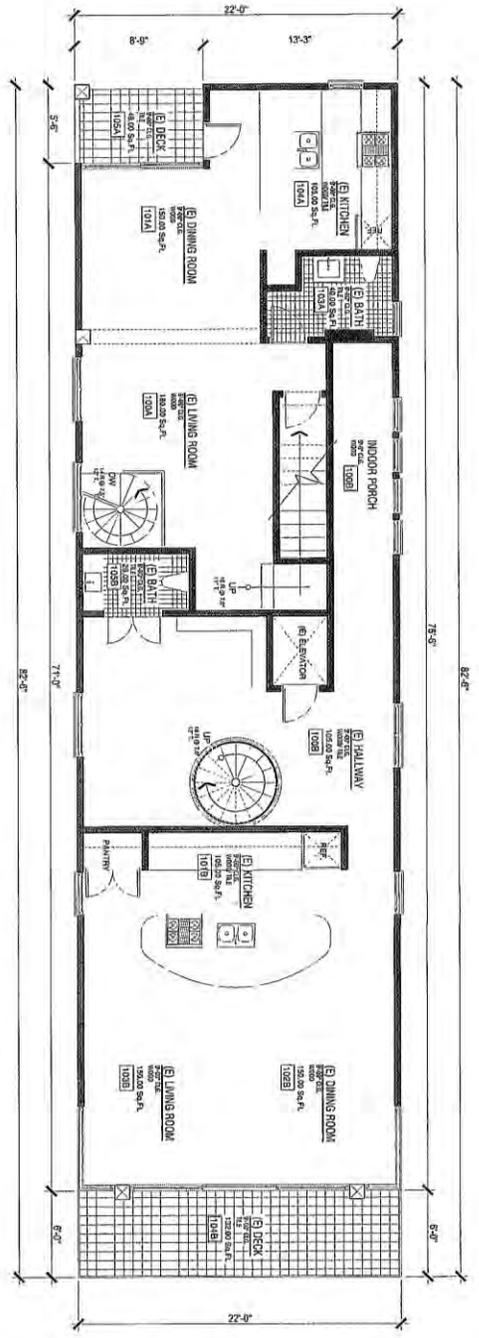


(E) BASEMENT PLAN

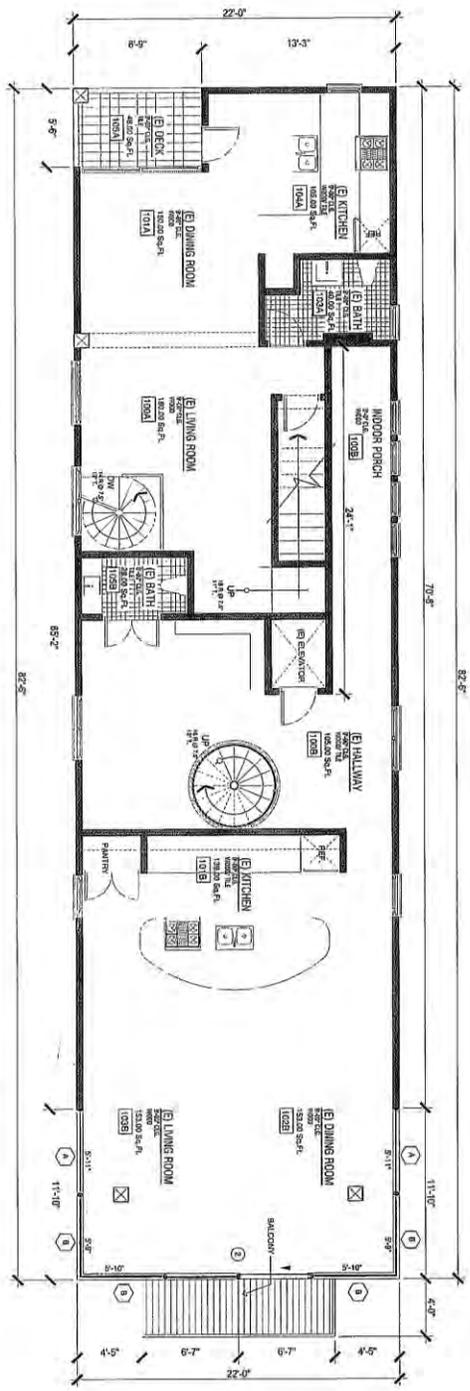
SCALE: 1/8" = 1'-0"

COASTAL COMMISSION

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(E) 1ST FLOOR PLAN
SCALE: 1/8" = 1'-0"



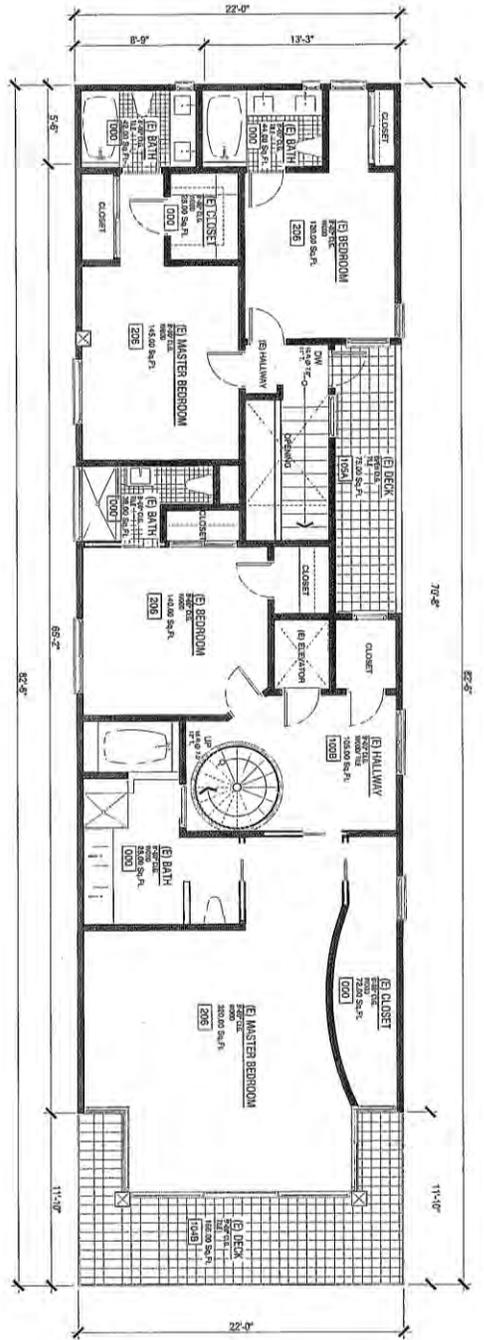
(E) 1ST FLOOR PLAN
SCALE: 1/8" = 1'-0"

WINDOW SCHEDULE	MATERIAL	SPECIFICATION	ON EQUAL	MANUFACTURER
A	5'-11 1/2" x 7'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
B	5'-0" x 7'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
C	5'-0" x 7'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
D	4'-0" x 7'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
E	5'-0" x 11'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
F	2'-2 1/2" x 7'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
G	2'-0" x 7'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
H	4'-0" x 11'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
I	3'-0" x 11'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
J	5'-11 1/2" x 2'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
K	5'-11 1/2" x 2'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	
L	5'-0" x 2'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	600 SERIES EQUAL, 1/2" AIR LOCK FRAME	

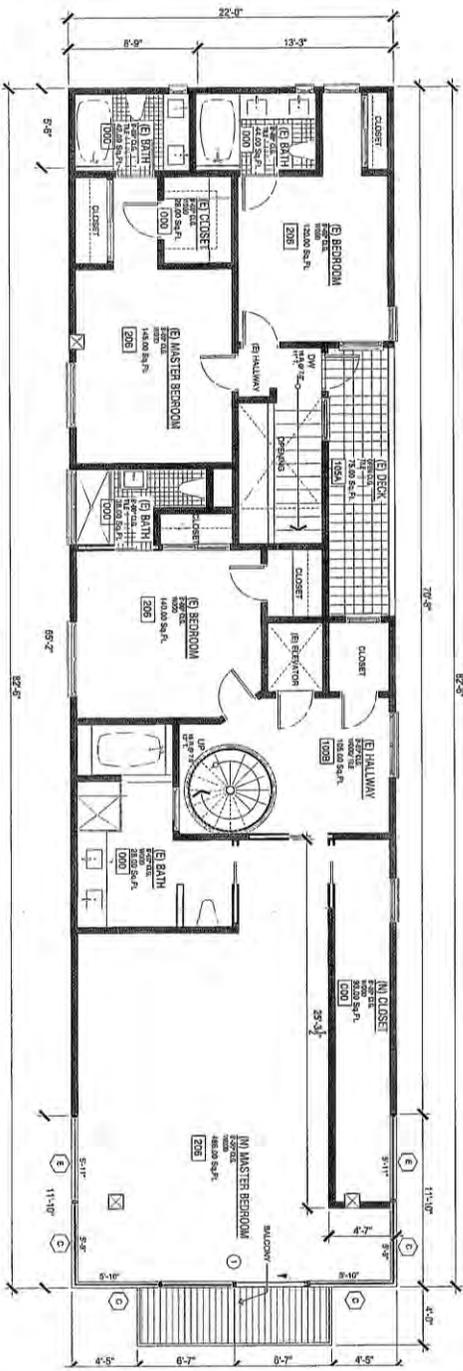
DOOR SCHEDULE	MATERIAL	SPECIFICATION	ON EQUAL	MANUFACTURER
1	6'-0" x 8'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	100 SERIES MEDIUM STILE, 0" AIR LOCK FRAME	
2	6'-0" x 8'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	100 SERIES MEDIUM STILE, 0" AIR LOCK FRAME	
3	3'-0" x 8'-0" FIBRO	ALUMINUM/CLAD, TYP. GL.	100 SERIES MEDIUM STILE, 0" AIR LOCK FRAME	

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(E) 2ND FLOOR PLAN
SCALE: 1/4" = 1'-0"



(N) 2ND FLOOR PLAN
SCALE: 1/4" = 1'-0"

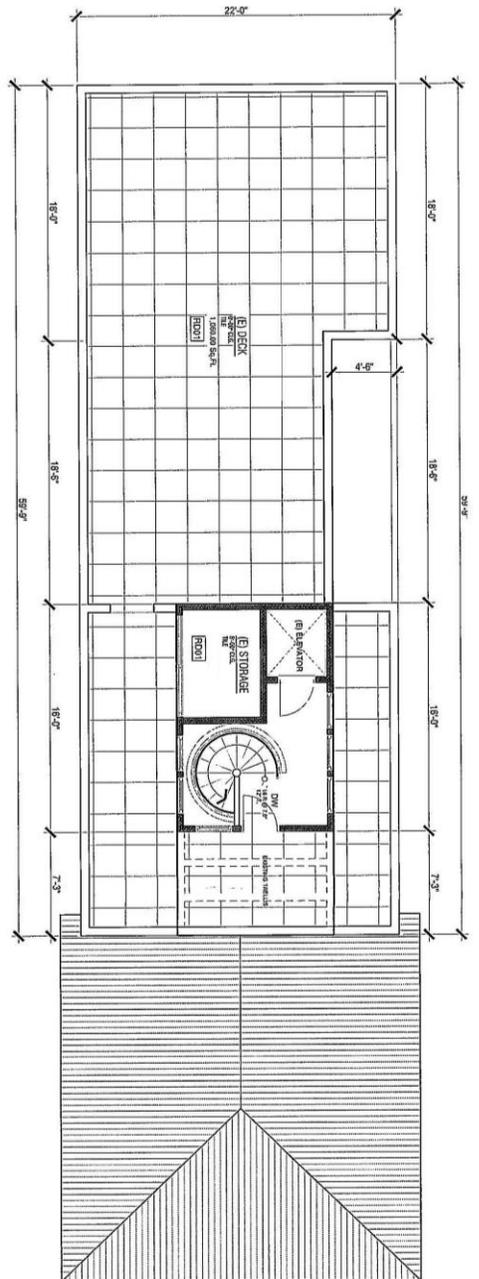
WINDOW SCHEDULE	MATERIAL	SPECIFICATION	ON SCALE	MANUFACTURER
A	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		BY FLEETWOOD CUSTOM LUMBER WORKING & COOKS 2023/04/03/09
B	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
C	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
D	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
E	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
F	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
G	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
H	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
I	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
J	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
K	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		
L	3-11/8" x 7" FRIGED	ALUMINUM/ANODIZED, TYPICAL, 800 SERIES EQUAL, L50, 1/2" BLOCK FRAME		

DOOR SCHEDULE	MATERIAL	SPECIFICATION	ON SCALE	MANUFACTURER
1	6-0" x 8-0" ALUMINUM/ANODIZED, TYPICAL, 800 SERIES MEDIUM STYLE	800 SERIES MEDIUM STYLE, ON SCALE		BY FLEETWOOD CUSTOM LUMBER WORKING & COOKS 2023/04/03/09
2	6-0" x 8-0" ALUMINUM/ANODIZED, TYPICAL, 800 SERIES MEDIUM STYLE	800 SERIES MEDIUM STYLE, ON SCALE		
3	3-0" x 8-0" ALUMINUM/ANODIZED, TYPICAL, 800 SERIES MEDIUM STYLE	800 SERIES MEDIUM STYLE, ON SCALE		

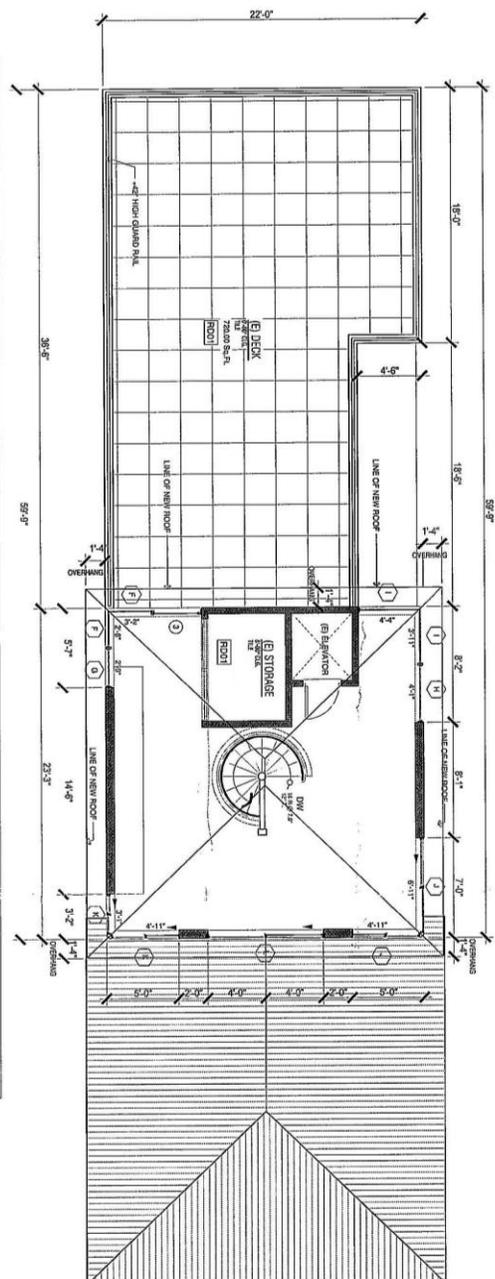
(N) 2ND FLOOR PLAN
SCALE: 1/4" = 1'-0"

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(E) ROOF/DECK PLAN
SCALE: 1/4" = 1'-0"



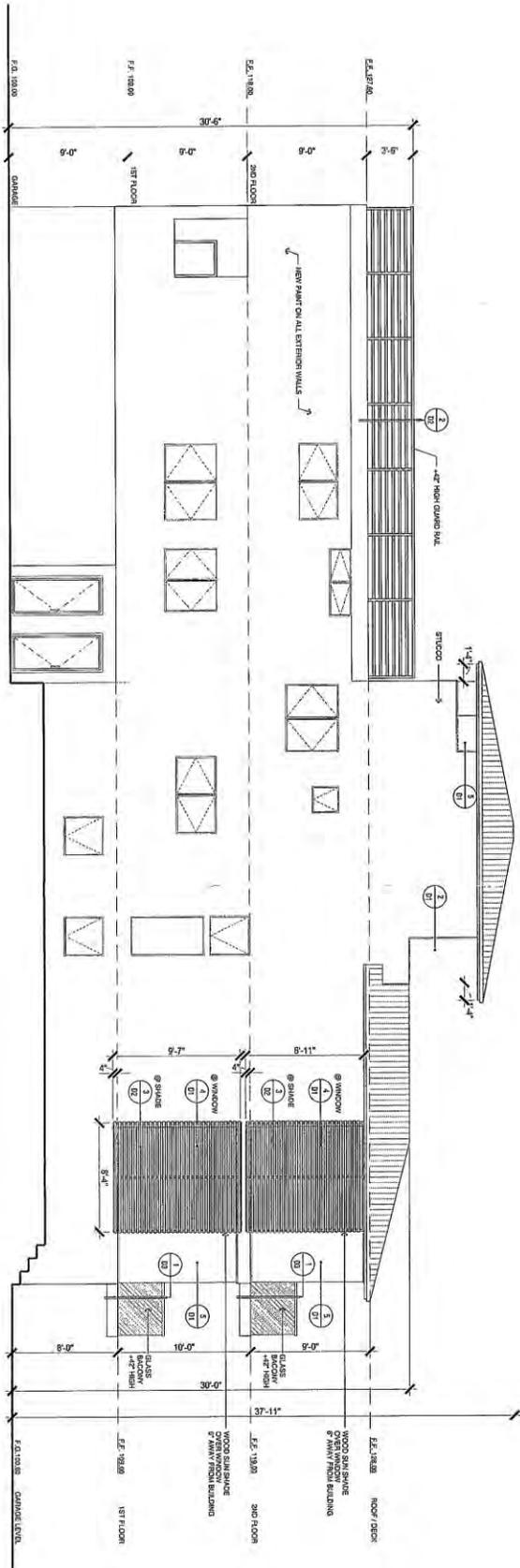
(N) 3RD FLOOR PLAN
SCALE: 1/4" = 1'-0"

NO.	WINDOW SCHEDULE	MATERIAL	SPECIFICATION	OR EQUAL	MANUFACTURER
A	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
B	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
C	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
D	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
E	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
F	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
G	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
H	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
I	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
J	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
K	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
L	3'-0" x 4'-0" FIXED	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		

NO.	DOOR SCHEDULE	MATERIAL	SPECIFICATION	OR EQUAL	MANUFACTURER
1	PAN 1000	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
2	PAN 1000	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		
3	3000	ALUMINUM/CLAD, TEMP. GL.	605 SERIES ALUMINUM/CLAD WINDOW, 605 SERIES ALUMINUM/CLAD WINDOW FRAME, 605 SERIES ALUMINUM/CLAD WINDOW FRAME		

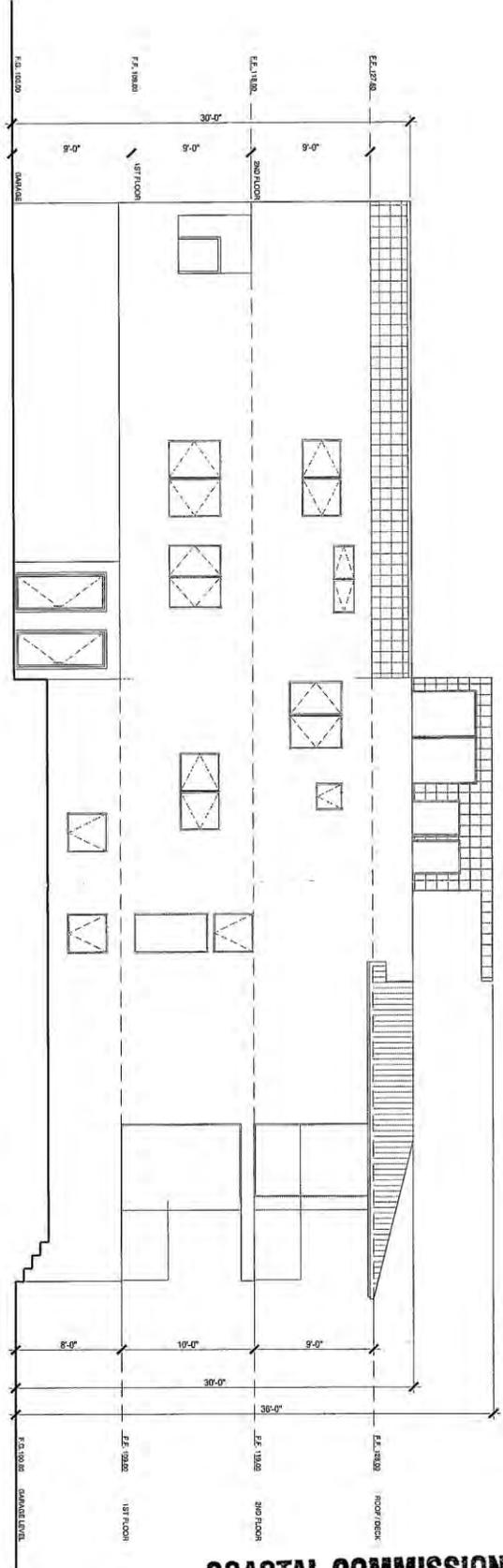
COASTAL COMMISSION

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(N) EAST ELEV.

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

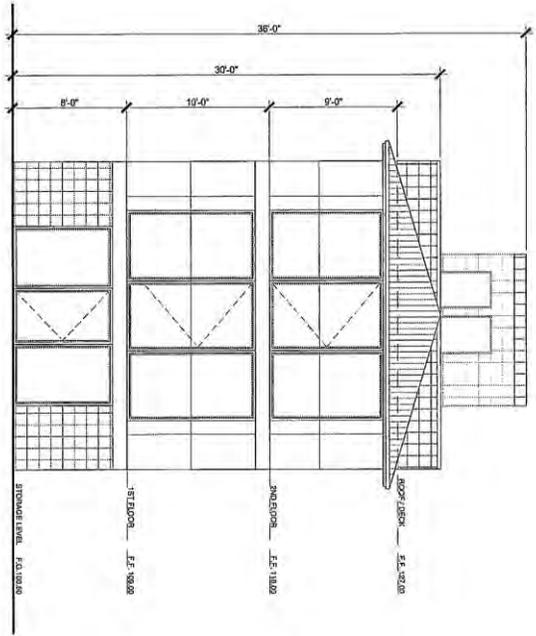


(E) EAST ELEV.

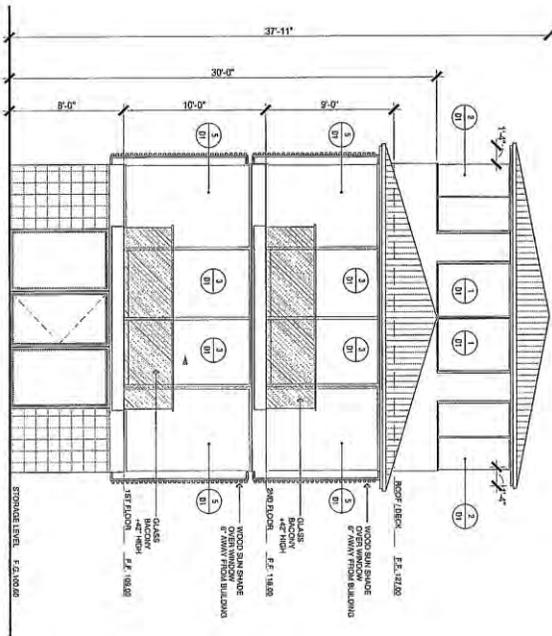
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COASTAL COMMISSION

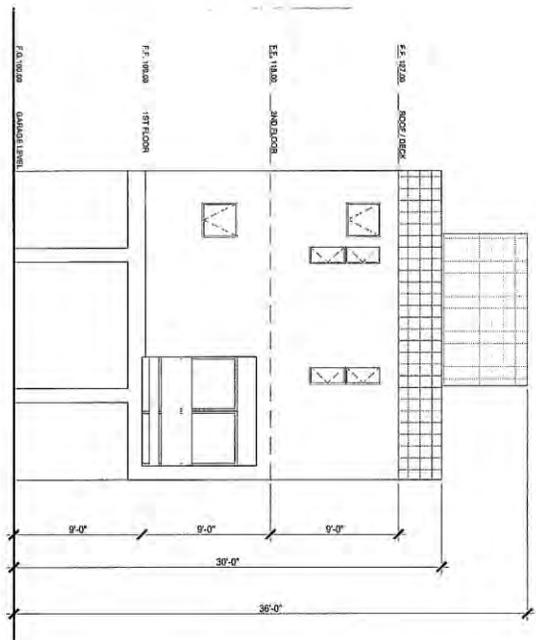
EXHIBIT # 3
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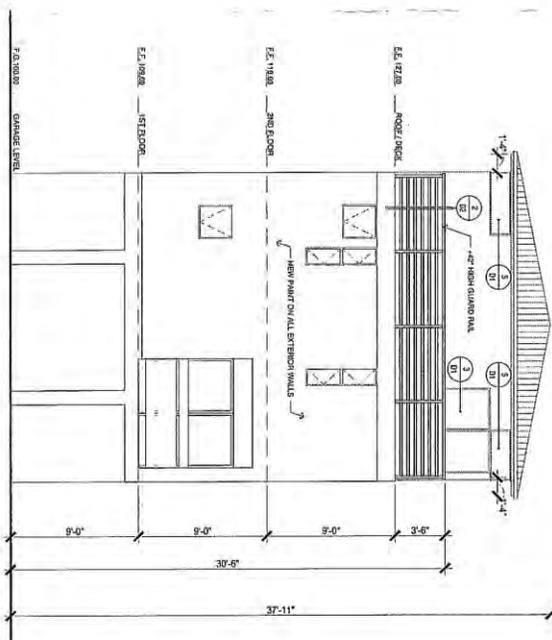
(E) NORTH ELEV.
SCALE: 1/8" = 1'-0"



(E) NORTH ELEV.
SCALE: 1/8" = 1'-0"



(E) SOUTH ELEV.
SCALE: 1/8" = 1'-0"



(N) SOUTH ELEV.
SCALE: 1/8" = 1'-0"

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