

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
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(562) 590-5071



Th17k

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original staff report

ADDENDUM

April 8, 2016

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **APPEAL NO. A-5-VEN-16-0034 (Revilo Investments LLC) FOR THE COMMISSION MEETING OF THURSDAY, APRIL 14, 2016.**

PUBLIC CORRESPONDENCE

Commission staff received one (1) letter of concern for the proposed project from Lydia Ponce. The letter indicates support for finding a substantial issue with regard to the grounds on which the appeal was filed and includes an attached article from a local publication. Commission staff received one (1) letter of concern for the proposed project from Sue Kaplan. The letter is in response to the developer's prewritten letter seeking support for his project.

ADDITIONAL FINDINGS

Commission staff recommends modifications to the staff report dated April 1, 2016.

The following paragraph shall be added to the De Novo section of the staff report:

C. UNPERMITTED DEVELOPMENT

Unpermitted development has occurred at the project site subject to this application. The unpermitted development includes the substantial demolition of a residential structure, resulting in the alteration of the size of the structure, without a valid coastal development permit. Any development activity, that is not otherwise exempt, which is not the case here, 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 requesting that the Commission find the proposed development to be exempt. Denial of this application pursuant to the staff recommendation will

result in violations remaining on the property. The Commission's enforcement division will consider options to address said violations as a separate matter.

Although the development has taken place prior to Commission action on this application, consideration of this application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act.

Oshida, Caitlin@Coastal

From: Lydia Ponce <venicelydia@gmail.com>
Sent: Friday, April 08, 2016 12:28 PM
To: Oshida, Caitlin@Coastal
Subject: Fwd: 632 Brooks Ave (A-5-VEN-16-0034)
Attachments: Beachhead_Article_Jon_Wolff_April3,2016.pdf

Fifth and last...
One.

Thank you very very much...
Lp

----- Forwarded message -----

From: Lydia Ponce <venicelydia@gmail.com>
Date: Friday, April 8, 2016
Subject: 632 Brooks Ave (A-5-VEN-16-0034)
To: "Rehm, Zach@Coastal" <Zach.Rehm@coastal.ca.gov>

California Coastal Commission

Coastal Staff & Coastal Commissioners

200 Oceangate, 10th Floor

Long Beach, CA 90802

Re. SUPPORT OF Coastal Exemption Appeal

632 Brooks Ave (A-5-VEN-16-0034)

Hearing date: Thursday April 14, 2016

Agenda Item 17.k.

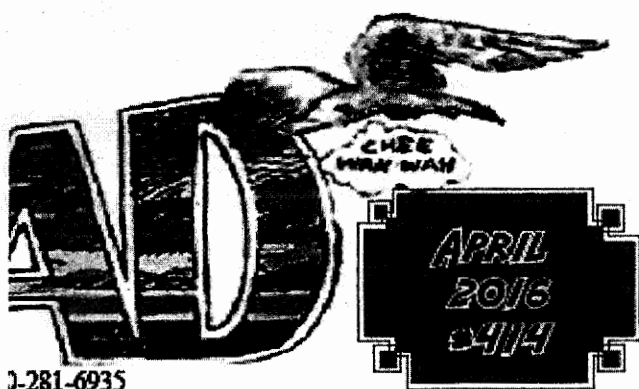
Coastal Staff and Honorable Commissioners,

**Please consider the attached very poignant article by one of our talented Free Venice Beachhead reporters,
as pertains to your decision on this very important Appeal. Your support is essential and invaluable to
the Venice Community's efforts to keep Venice Venice.**

For the love of Venice.....

Sincerely yours,

Lydia Ponce



VENICE IT MATTERS

by Jon Wolff.

If you've never attended a meeting of the Venice Neighborhood Council, you should come sometime to see how it all works. The Council discusses and votes on a variety of topics specific to Venice. The Boardwalk, homelessness, business, and culture are just some of the subjects covered at a typical meeting of the VNC.

One issue that comes up at every meeting concerns building owners' proposals to demolish older buildings and build newer and taller buildings in their place. These proposals are often labeled as "remodeling" and they are usually presented as innocuous minor changes with no noticeable impact on the neighborhood. The owners present themselves as humble Venice residents who just want to improve their home to accommodate their kids. Or, if the owners are operating a business, they assure the Council that the enlargement of their building won't significantly affect parking in Venice because they'll include a bike rack to encourage more environmentally sound means of transportation. They sometimes bring the architects along to the meeting to show slides or models representing the changes to the building.

The Council discusses the facts and votes their recommendation on the proposal. But, before they do, there's usually a counter argument from neighbors and concerned Venice activists about the facts not revealed by the owners. We learn that the proposed remodeling will actually be much taller or wider than the owners claimed. Or that the existing laws specifically disallow changes of this kind because they would cause phenomenal damage to the character of the neighborhood. Or, it turns out, the owners are only doing this so they can rent out the new structure as a short-term rental with "Air-BM-b".

Now, here's where the important part comes in. And it's the reason you need to attend the meetings in person. Because you need to see the thing that a lot of people miss. It happens when the person making the argument against the proposal is speaking from the podium. Don't watch the speaker, watch the building owners. When the speaker is making the counter argument and exposing the real story, check out the owners. Watch their faces. Look at their eyes and you will see their reaction to the

continued on page 3

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It Matters - continued from page 1

speaker's words. You'll see the contempt. You'll see the contempt for the speaker, the neighbors, the tenants, the activists, and the very History of Venice. You'll see their plans for a Venice of their own design which doesn't include any of the men and women who have lived in and struggled for Venice for twenty, thirty, fifty years. You'll know that their plans are to tear down and pave over all traces of the Venice that drew them here in the first place.

To the owners and companies that are demolishing every building in Venice and replacing them with big ugly boxes, the people of Venice don't matter. The neighbors who don't want to live in the shadow of some new concrete monstrosity don't matter. All the "little people" don't matter. To a development corporation, the people who speak out at the Venice Neighborhood Council meetings are just minor obstacles in the road. The corporation expects to get its way whether by the VNC's approval or by some political operator in L.A. City Hall. And the law be damned. You don't matter.

This happens elsewhere. The people in Flint, Michigan didn't matter when their environmental regulators were sending them lead-flavored tap water. That pharmaceutical CEO Bozo Shkreli laughed when Congress was on him for charging people \$750 for a pill. To him, the people who needed the pills didn't matter. And the people out in Porter Ranch who got gassed by So Cal Gas didn't matter when So Cal Gas knew that gas was leaking from a busted gas valve on their gassy gas pit.

To the developers/destroyers of Venice, you don't matter because you're just one lone person with no power. While you work, sit in traffic, and sleep, they're looking at maps, making contracts, transferring funds, lobbying politicians, and gnawing away at the foundation of Venice. No wonder no one matters to them; there's no one left to matter. Or is there?

Right now, in the Land of Venice, there are groups of Venice people meeting, talking, planning, and acting. Just as a corporation is a body of individuals acting together to take from other people, a Union of people can act together to take back. The combined talents of many individuals working toward a common goal can match the power of any corporation. And the goal is obtainable for one good reason: there's more of us than there are of them. We can and will win. ♥

If you heard that people who are working to save Venice were speaking at the next VNC meeting, would you come to listen? If you knew that people were gathering in Venice to stand for the Venice you love, would you be there? If you learned that a group of people like the Westside Tenants Union were getting together in Venice to establish once and for all the truth that Housing is a Human Right, would you help? If you believed that Venice would be free again, would your help matter? Yes it will.

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South Coast Region

APR 08 2016

CALIFORNIA
COASTAL COMMISSION

Sue Kaplan
Venice, CA 90291

Appeal A-5-VEN-16-0034
632 Brooks Avenue, Venice

Dear Zach,

Thank you for your inclusive work on this case. I think it shows the project and the process awarding the permits quite clearly.

I need to correct some points that the developer made in his prewritten letter seeking support for his project.

First and foremost is his assertion that this appeal and others were from the Venice Neighborhood Council. You know that not only is that not true, that would never happen. The VNC is not a governing body but an advisory organization. Volunteers with that organization can certainly act on their own, as individuals. Even then, saying these 3 Appellants are all involved in the VNC is incorrect.

Second, you also know the number of projects that come before you and the number being appealed is certainly not "every" project nor is it even close. It is barely 20%.

Third, it is nothing more than hyperbole to say that any one person or body is halting construction in Venice. Only you or the City can stop a project. It is also not the Coastal Commission who is granting the erroneous Coastal Exemptions or the Coastal Development Permits that have erroneous and incomplete findings, but rather the City..

Lastly, I would like to point out that in the letter by Louis Leal, who works in the real estate office of Tami Pardee, he also makes a false accusation: "there have been way too many appeals of projects around town that are frivolous and have no basis for appeal aside the fact the some people just do not want to see change."

As you well know, those "some people" take great care and time to make sure that appeals are neither frivolous nor vindictive. And they are all grounded in fact as shown by you and your

colleagues in finding Significant Issue for essentially all of them in this CEX appeal effort. He may be right about that more people don't drive Model-T's today than do, but it doesn't follow that people who may drive an old car are adverse to good modern architecture that does fit the character of the neighborhood.

Please allow this letter to explain to the Commissioners the speciousness of these assertions and how they distract and misdirect us all from the good work of the Coastal Commission.

Thank you,
Sue Kaplan.

CALIFORNIA COASTAL COMMISSION

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Th17k

Filed: 3/4/2016
49th Day: 4/22/2016
Staff: Z. Rehm – LB
Staff Report: 4/1/2016
Hearing Date: 4/14/2016

STAFF REPORT: APPEAL – SUBSTANTIAL ISSUE AND DE NOVO

Local Government: City of Los Angeles

Local Decision: Claim of Exemption to Coastal Development Permit Requirement

Appeal Number: A-5-VEN-16-0034

Applicant/Agent: Revilo Investments LLC

Appellants: Robin Rudisill, Sue Kaplan, David Ewing

Project Location: 632 Brooks Avenue, Venice, City of Los Angeles

Project Description: Appeal of City of Los Angeles Local Coastal Exemption No. DIR-2015-3600-CEX for renovation to 1,806 sq.ft. attached duplex structure, and 2,120 sq.ft. first and second story addition, including new garage with living unit above, and new pool/spa, on 5,194 sq.ft. lot, resulting in 2 new separate two-story units of 1,860 sq.ft. and 1,314 sq.ft.

Staff Recommendation: Find Substantial Issue with City of Los Angeles Claim of Exemption and deny Coastal Exemption

Important Hearing Procedure 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 follow, unless it has been postponed, during which the Commission will take public testimony.

SUMMARY OF STAFF RECOMMENDATION

The staff recommends that the Commission determine that a **substantial issue exists** with respect to the grounds on which the appeal has been filed for the following reason: the development on the site is the demolition of an attached residential structure (duplex) and construction of two new detached residential structures, and is not an improvement to an existing structure, and is therefore non-exempt “development” as defined in the Coastal Act. Commission staff was notified on March 4, 2016 that although the City’s Coastal Exemption DIR-2015-3600-CEX was issued for a renovation and addition *to an existing structure*, the entire structure had been demolished, with the exception of portions of the wood framing and a portion of the foundation (see image below and Exhibit 2). Demolition, reconstruction, or substantial redevelopment of a project in the Venice coastal zone are not exempt under any section or provision of the Coastal Act or the Commission’s Regulations and require a coastal development permit. Commission Staff recommends that the Commission **deny the claim of exemption** and find that the proposed project requires a local coastal development permit, and return this matter to the City for processing. The **motions** to carry out the staff recommendation are on **pages 4 and 11**.



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APPENDICES

Appendix A - Substantive File Documents

EXHIBITS

Exhibit 1 – Vicinity Map
Exhibit 2 – Photos of Site Before and After Demolition
Exhibit 3 – Plans Submitted by Applicant
Exhibit 4 – Appeal
Exhibit 5 – Letters in Support of Project

I. MOTION AND RESOLUTION

MOTION: *I move that the Commission determine that Appeal No. A-5-VEN-16-0034 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 this motion will result in a de novo hearing on the application, and adoption of the following resolution and findings. 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 appointed Commissioners present.

RESOLUTION:

*The Commission hereby finds that Appeal No. A-5-VEN-16-0034 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 March 4, 2016, the Commission received an appeal of Local Coastal Exemption DIR-2015-3600-CEX from Robin Rudisill, Sue Kaplan, and David Ewing. The appeal contends that more than 50% of the structure will be demolished, the mass and scale of the locally-approved project is inconsistent with the community character of the area and therefore is inconsistent with the Venice certified Land Use Plan (LUP) and the Chapter 3 policies of the Coastal Act, and the project was not adequately reviewed for consistency with the Mello Act. For the reasons stated above, the appellants contend that the City-approved project does not qualify for an exemption and requires the review afforded through the coastal development permit process.

III. LOCAL GOVERNMENT ACTION

On October 1, 2015, the Los Angeles Department of City Planning issued a Coastal Exemption (DIR-2015-3600-CEX) for development proposed at 632 Brooks Avenue, Venice, Los Angeles. The applicant listed on the City's exemption form is Zoran Pevec and the property is owned by Revilo Investments LLC. The appeal form states that the proposed development is: "*Renovation and addition to existing 1,806 sq. ft. 4 bedroom, 2 bath duplex. Addition includes 2,125 sq. ft. of space, including 4 car garage and pool/spa, 50% of existing structure to remain (50% of exterior walls).*" (emphasis added) On October 16, 2015, the Los Angeles Department of Building and Safety issued Building Permit No. 15014-30000-02234, and demolition commenced at the project site. The City forwarded a copy of the Coastal Exemption to the Coastal Commission's South Coast District Office on February 4, 2016 – 126 days after the coastal exemption was issued and four months after construction has begun. On March 4, 2016, the appellants submitted the appeal to the Commission's South Coast District Office (**Exhibit 4**). The appeal of the City's action was determined to be valid because it was received prior to the expiration of the twenty working-day period in which any action by the City of Los Angeles can be appealed to the Commission. On March 7, 2016, a Notification of Appeal was sent to the Los Angeles Department of City Planning and the applicant, notifying each party of the appeal of DIR-2015-3600-CEX, and therefore the decision was stayed pending Commission action on the appeal.

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 §§ 30625.]

After a final local action on a local coastal development permit application (or permit exemption), the local government is required to notify the Coastal Commission 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 applicant, 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, among other requirements, providing 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 government’s decision. 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.

In this case, Commission staff recommends a finding of **substantial issue**. If the Commission decides that the appellants’ 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 government’s action (exemption) is voided and the Commission holds a public hearing in order to review the application 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 move to the de novo phase of the public hearing on the merits of the application. A de novo public hearing on the merits of a coastal development permit application uses the Chapter 3 policies of the Coastal Act. The certified Venice Land Use Plan (LUP) 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 applicant, 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. SINGLE/DUAL PERMIT JURISDICTION AREAS

Section 30601 of the Coastal Act provides details regarding the geographic areas where applicants must also obtain a coastal development permit from the Commission in addition to obtaining a local coastal development permit from the City. These areas are considered Dual Permit Jurisdiction areas. Coastal zone areas outside of the Dual Permit Jurisdiction areas are considered Single Permit Jurisdiction areas. Pursuant to Section 30600(b) of the Coastal Act, the City of Los Angeles has been granted the authority to approve or deny coastal development permits in both jurisdictions, but all of the City's actions are appealable to the Commission. The proposed project site is located within the Single Permit Jurisdiction Area.

VI. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The project site is located in the Oakwood subarea in Venice at 632 Brooks Avenue within the City's Single Permit Jurisdiction, about 0.6 miles inland of the beach (**Exhibit 1**). The lot area is 5,194 square feet, and is zoned RD1.5-1 (Multi Family Residential) in the Los Angeles Zoning Code. According to Los Angeles County Records, prior to the demolition of the structure, the site was developed with a 1,768 square-foot duplex constructed in 1945 (see photo in **Exhibit 2**). The proposed scope of work listed in the City's Local Coastal Exemption, DIR-2015-3600-CEX, describes the proposed project as:

*“Renovation and addition to **existing 1,806 sq. ft. 4 bedroom, 2 bath duplex**. Addition includes 2,120 sq. ft. of space, including 4 car garage and pool/spa, **50% of existing structure to remain** (50% of exterior walls).”*(emphasis added; see **Exhibit 4**)

The Commission was notified on March 4, 2016 that although the City's Local Coastal Exemption, DIR-2015-4670-CEX was issued for a renovation and addition *to an existing structure*, the entire structure had been demolished, with the exception of portions of the wood framing and a portion of the foundation (**Exhibit 2**). Demolition, reconstruction, or substantial redevelopment of a project in the Venice coastal zone are not exempt under any section or provision of the Coastal Act or the Commission's Regulations, and require a coastal development permit.

The Commission received eight letters in support of the project from Venice residents and a Venice realtor. The letters indicate that the neighbors support the design of the project and welcome the owner to the neighborhood. The letters are included as **Exhibit 5** of this report.

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 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 are that the project is not an improvement to an existing structure, and is therefore non-exempt “development” as defined in the Coastal Act and so a coastal development permit should have been required.

Coastal Act Section 30610 Developments authorized without permit, states:

Notwithstanding any other provision of this division, no coastal development permit shall be required pursuant to this chapter for the following types of development and in the following areas:

*(a) **Improvements to existing single-family residences**; provided, however, that the commission shall specify, by regulation, those classes of development which involve a risk of adverse environmental effect and shall require that a coastal development permit be obtained pursuant to this chapter.*

*(b) **Improvements to any structure other than a single-family residence or a public works facility**; provided, however, that the commission shall specify, by regulation, those*

types of improvements which (1) involve a risk of adverse environmental effect, (2) adversely affect public access, or (3) involve a change in use contrary to any policy of this division. Any improvement so specified by the commission shall require a coastal development permit.

California Administrative Code of Regulations Section 13250 Improvements to Existing Single-Family Residences, states:

(a) For purposes of Public Resources Code Section 30610(a) where there is an existing single-family residential building, the following shall be considered a part of that structure:

(1) All fixtures and other structures directly attached to a residence;

(2) Structures on the property normally associated with a single-family residence, such as garages, swimming pools, fences, and storage sheds; but not including guest houses or self-contained residential units; and

(3) Landscaping on the lot.

Additionally, the Commission typically requires fifty percent of the structure to be maintained in order to qualify as ***an existing structure***.

Section 13252 Repair and Maintenance Activities That Require a Permit, states:

*(b) Unless destroyed by natural disaster, the replacement of **50 percent or more** of a single family residence, seawall, revetment, bluff retaining wall, breakwater, groin or any other structure is not repair and maintenance under Section 30610(d) but instead constitutes a replacement structure requiring a coastal development permit.*

Section 13253 Improvements to Structures Other than Single-Family Residences and Public Works Facilities That Require Permits, states:

(a) For purposes of Public Resources Code section 30610(b) where there is an existing structure, other than a single-family residence or public works facility, the following shall be considered a part of that structure:

(1) All fixtures and other structures directly attached to the structure.

(2) Landscaping on the lot.

(b) Pursuant to Public Resources Code section 30610(b), the following classes of development require a coastal development permit because they involve a risk of adverse environmental effect, adversely affect public access, or involve a change in use contrary to the policy of Division 20 of the Public Resources Code:

(1) Improvement to any structure if the structure or the improvement is located: on a beach; in a wetland, stream, or lake; seaward of the mean high tide line; in an area designated as highly scenic in a certified land use plan; or within 50 feet of the edge of a coastal bluff;

(2) Any significant alteration of land forms including removal or placement of vegetation, on a beach or sand dune; in a wetland or stream; within 100 feet of the edge of a coastal bluff, in a highly scenic area, or in an environmentally sensitive habitat area;

(3) The expansion or construction of water wells or septic systems;

(4) On property not included in subsection (b)(1) above that is located between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide of the sea where there is no beach, whichever is the greater distance, or in significant scenic resource areas as designated by the commission or regional commission an improvement that would result in an increase of 10 percent or more of internal floor area of the existing structure, or constitute an additional improvement of 10 percent or less where an improvement to the structure has previously been undertaken pursuant to Public Resources Code section 30610(b), and/or increase in height by more than 10 percent of an existing structure;

(5) In areas which the commission or regional commission has previously declared by resolution after public hearing to have a critically short water supply that must be maintained for protection of coastal recreation or public recreational use, the construction of any specified major water using development including but not limited to swimming pools or the construction or extension of any landscaping irrigation system;

(6) Any improvement to a structure where the coastal development permit issued for the original structure by the commission, regional commission, or local government indicated that any future improvements would require a development permit;

(7) Any improvement to a structure which changes the intensity of use of the structure;

(8) Any improvement made pursuant to a conversion of an existing structure from a multiple unit rental use or visitor-serving commercial use to a use involving a fee ownership or long-term leasehold including but not limited to a condominium conversion, stock cooperative conversion or motel/hotel timesharing conversion.

(c) In any particular case, even though the proposed improvement falls into one of the classes set forth in subsection (b) above, the executive director of the commission may, where he or she finds the impact of the development on coastal resources or coastal access to be insignificant, waive the requirement of a permit; provided, however, that any such waiver shall not be effective until it is reported to the commission at its next regularly scheduled meeting. If any three (3) commissioners object to the waiver, the proposed improvement shall not be undertaken without a permit.

To date, all that remains of the pre-existing structure at the subject site is portions of the framing and portions of the foundation. On-site observations made by staff and photographic evidence demonstrate that the roof, interior walls and floors, siding, electrical system, plumbing, and drywall have been removed (**Exhibit 2**). The amount of the structure that has been removed exceeds fifty percent of the structure. The City of Los Angeles Certified Land Use Plan (LUP) for Venice defines “remodel” as: *an improvement to an existing structure in which no more than fifty percent (50%) of the exterior walls are removed or replaced*. However, when a “remaining wall” is used as a measure

to determine whether a development is a remodel or a new structure, the wall must remain intact as part of the structure, and for purposes of calculating the 50 percent guideline should retain its siding, drywall/plaster, windows, and doorways. Demolition, reconstruction, or substantial redevelopment of a project in the Venice coastal zone are not exempt under any section or provision of the Coastal Act or the Commission's Regulations and require a coastal development permit. Therefore, the proposed development is not exempt from the permitting requirement and the applicant must obtain a coastal development permit. This appeal raises a substantial issue as to conformity with the Chapter 3 policies of the Coastal Act because the development, which did not obtain a coastal development permit, has not yet been reviewed for conformity with the Chapter 3 policies.

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), because the nature of the proposed project and the local government action are not consistent with policies of Chapter 3 of the Coastal Act.

The first factor is the degree of factual and legal support for the local government's decision that the development is exempt from coastal development permit requirements. Issuing an Exemption for a project with the scope of work that includes a “*Renovation and addition to **existing 1,806 sq. ft. 4 bedroom, 2 bath duplex**. Addition includes 2,120 sq. ft. of space, including 4 car garage and pool/spa, 50% of existing structure to remain (50% of exterior walls)*” could be, on its face, consistent with the Coastal Act. However, in order to qualify for an exemption, at least 50 percent of the existing structure must be retained. The City's issuance of an exemption for this project, however, has resulted in exempting development from permitting requirements that includes demolition of over 50 percent of the existing structure when, in fact, such demolition and reconstruction projects constitute replacement structures under section 13252 of the Commission's regulations. Additionally, City staff states that at the time it issued this coastal exemption, it did not retain copies of the plans for the proposed development that it exempted from coastal development permit requirements. There are no plans in the City record for Commission staff to review to determine whether the City properly determined that an exemption was appropriate. Therefore, the Coastal Commission finds that the City does not have an adequate degree of factual and legal support for its exemption determination.

The second factor is the extent and scope of the development as approved or denied by the local government. As discussed, the demolition of most of the structure that occurred on the property exceeded the scope of what was authorized under the coastal exemption, which invalidates the exemption. Los Angeles County records indicate that the structure that was substantially demolished was a 1,768 square-foot duplex constructed in 1945. The project to be constructed as a result of the City-issued Exemption two new structures, disregarding the structural integrity of the aged foundation and framing of the existing one structure. Even if the plans do not indicate replacement of floors and walls, the City building inspector may require replacement of these components for safety reasons. In fact, it appears all of the floors and walls have already been removed and will be replaced (**Exhibit 2**). The full extent and scope of the proposed, large project will be reviewed by the City through the local coastal development permitting process.

The third factor is the significance of the coastal resources affected by the decision. The significant coastal resource is community character. The City's coastal exemption process was utilized instead of the coastal development permit process, during which the proposed development would be reviewed for consistency with the character of the surrounding area. Community character issues are

particularly important in Venice. Although this exemption relates only to one project, the erosion of community character is a cumulative issue, and the City's cumulative exemption of numerous large-scale remodel and demolition projects has a significant impact on Venice's visual character. See, e.g., staff report dated 1/28/16 for Appeal No. A-5-VEN-16-0005.

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. Issuing exemptions for proposed projects like these that result in the construction of new larger structures circumvents the coastal development permit process and its requirement for public participation, and sets a bad precedent. As discussed above, significant adverse impacts to coastal resources would potentially occur, if the City's coastal exemption process is inappropriately used to avoid the coastal development permit process, during which the proposed development would be reviewed for consistency with the character of the surrounding area and would potentially set a bad precedent. The abuse of the City's coastal exemption process in order to avoid obtaining a coastal development permit for new development is a recurring problem. See, e.g., staff report dated 1/28/16 for Appeal No. A-5-VEN-16-0005.

The final factor is whether the appeal raises local issues, or those of regional or statewide significance. Although this appeal raises specific local issues, exempting projects from the coastal development process will have potential negative and cumulative impacts to the coast if they are not properly reviewed through the local coastal development permit process and monitored by the City. Therefore, the City's approval does raise issues of statewide significance.

In conclusion, the primary issue for the appeal is that the development is actually the replacement of the existing duplex with a new duplex, and therefore a coastal development permit must be obtained in order to ensure that it conforms to the policies of the certified LUP and 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.

VII. MOTION AND RESOLUTION – DE NOVO

Motion: *I move that the Commission **approve** Claim of Exemption No. A-5-VEN-16-0034 for the development proposed by the applicant.*

Staff recommends a **NO** vote. Failure of this motion will result in denial of the *claim of exemption* and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby denies the Claim of Exemption for the proposed development on the ground that the development is not exempt from the permitting requirements of the Coastal Act and adopts the findings set forth below.

VIII. FINDINGS AND DECLARATIONS – DE NOVO

A. PROJECT DESCRIPTION

The actual project as documented on the project site, as well as project plans provided by the applicant (**Exhibit 3**), is the demolition of a 1,768 square-foot attached duplex constructed in 1945 and construction of two new detached two-story units: one with 1,860 square feet of living space and the other with 1,3214 square feet of living space on top of a four car garage, with a swimming pool in between, in the Oakwood subarea in Venice. To date, nearly the entire pre-existing structure has been demolished, with the exception of portions of the wood framing and portions of the foundation (**Exhibit 2**).

B. COASTAL DEVELOPMENT PERMIT REQUIREMENTS

Section 30600(a) of the Coastal Act requires that anyone wishing to perform or undertake any development within the coastal zone shall obtain a coastal development permit. Development is broadly defined by Section 30106 of the Coastal Act, which states:

“Development” means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z’berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).

Construction, reconstruction, demolition, or alteration of the size of any structure in the coastal zone is development that requires a coastal development permit, unless the development qualifies as development that is authorized without a coastal development permit.

Coastal Act Section 30610 provides, in part:

*Notwithstanding any other provision of this division, **no coastal development permit shall be required** pursuant to this chapter for the following types of development and in the following areas:*

- (a) **Improvements to any structure other than a single-family residence** or a public works facility; provided, however, that the commission shall specify, by regulation, those types of improvements which (1) involve a risk of adverse environmental effect, (2) adversely affect public access, or (3) involve a change in use contrary to any*

policy of this division. Any improvement so specified by the commission shall require a coastal development permit.

- (d) Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities; provided, however, that if the commission determines that certain extraordinary methods of repair and maintenance involve a risk of substantial adverse environmental impact, it shall, by regulation, require that a permit be obtained pursuant to this chapter.*

Section 13252, California Title 14 Regulations Repair and Maintenance Activities That Require a Permit, states:

- (b) Unless destroyed by natural disaster, **the replacement of 50 percent or more of a single family residence, seawall, revetment, bluff retaining wall, breakwater, groin or any other structure is not repair and maintenance under Section 30610(d) but instead constitutes a replacement structure requiring a coastal development permit.***

The grounds for this appeal are that the project is not exempt development as defined in the Coastal Act and so a coastal development permit should have been required. The City's interpretation of a "remodel" is based on the City's uncertified municipal code, not the provision of the Coastal Act.

The proposed project does not qualify for an exemption under Coastal Act Section 30610(b). Coastal Act Section 30610(b) allows *improvements* to existing structures without a coastal development permit. In this case, the applicant demolished nearly the entire structure as part of the proposed development. When an applicant has already demolished all or nearly all of a structure, there can no longer be a structure subject for improvement on the site.

The proposed project also does not qualify for an exemption under Coastal Act Section 30610(d). Coastal Act Section 30610(d) allows for repair and maintenance activities on existing structures so long as the repair and maintenance does not result in an addition to, or enlargement or expansion of, the subject structures. Under section 13252 of the Commission's regulations, if the repair and maintenance results in the replacement of 50 percent or more of the existing structure, then the project constitutes a replacement structure and the entire structure must be in conformity with applicable policies of Chapter 3 of the Coastal Act.

In determining whether the project constitutes the replacement of 50 percent or more of the existing single family residence, Commission staff analyzes what percentage of which components and how much of each component of the house is being replaced. A structure consists of many components that can be measured, such as: the foundation, plumbing, electrical, walls, floor, and/or roof of the structure. The project plans must indicate the amount of demolition and augmentation that is necessary to build the proposed remodel. If 50 percent or more of the total of these components are being replaced, then the project would not qualify as exempt development, and must obtain a coastal development permit pursuant to Section 30600(b) of the Coastal Act. Typically, the addition of a complete second story to a one-story structure would not qualify for an exemption because the amount of construction required to support the additional weight of a new level would often require substantial reconstruction/reinforcement of the first-floor load bearing walls, often with steel framing,

and/or a new foundation which would exceed the amount of change allowable under an exemption. Even if the plans do not indicate replacement of floors and walls, the City building inspector may require replacement of these components for safety reasons. For example, when an older house is enlarged, more than fifty percent of the components may need to be replaced due to termite infestation and/or dry rot, which are typical of Southern California homes.

In its exemption determinations the City of Los Angeles has asserted that even though all that remains of the structure is portions of the previously existing framing, (in this case on two sides of the pre-existing first story, with the roof and second story removed and the pre-existing structure completely stripped of siding, drywall, plaster, doors, and windows), that the “walls” of the structure remain. Commission staff disagrees with this assertion. When a “remaining wall” is used as a measure to determine whether a development is a remodel or a new structure, the wall must remain intact as part of the structure, and for purposes of calculating the 50 percent guideline should retain its siding, drywall/plaster, windows, and doorways. Further, staff has confirmed during a recent site visit that a portion of the studs/framing for the previously existing structure on site have been replaced with new wood (**Exhibit 2**).

In this case, prior to the demolition of the structure, the site was developed with a two-story 1,768 square-foot attached duplex constructed in 1945. According to DIR-2015-3600-CEX, the approved project was “*Renovation and addition to **existing 1,806 sq. ft. 4 bedroom, 2 bath duplex**. Addition includes 2,120 sq. ft. of space, including 4 car garage and pool/spa, **50% of existing structure to remain** (50% of exterior walls).*” The age of the existing structure should have indicated that there may have been underlying issues that would prevent the retention of more than 50 percent of the structure.

To date, all that remains of the former structure at the subject site is the portions of the exterior framing and portions of the foundation, which appears to be in the process of being removed and replaced. On-site observations made by staff and photographic evidence demonstrate that the roof, second story, partial foundation, siding, drywall/plaster, and doors and windows have been removed (**Exhibit 2**). The amount of the structure that has been removed exceeds fifty percent of the existing structure. Demolition, reconstruction, or substantial redevelopment of a project in the Venice coastal zone are not exempt under any section or provision of the Coastal Act or the Commission’s Regulations, and require a coastal development permit.

The applicant’s plans also indicate than a second entirely new structure is proposed where none existed before, including a four car garage and detached dwelling unit. This class of development is not exempt from coastal development permit requirements.

Coastal Act Section 30600, Coastal Development Permit; Procedures Prior to Certification of Local Coastal Program, states:

- (a) *Except as provided in subdivision (e), and in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person as defined in Section 21066, wishing to perform or undertake any development in the coastal zone, other than a facility subject to Section 25500, shall obtain a coastal development permit.*
- (b) *(1) Prior to certification of its local coastal program, a local government may, with respect to any 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. Those procedures may be incorporated and made a part of the procedures relating to any other appropriate land use development permit issued by the local government.

(2) A coastal development permit from a local government shall not be required by this subdivision for any development on tidelands, submerged lands, or on public trust lands, whether filled or unfilled, or for any development by a public agency for which a local government permit is not otherwise required.

(c) If prior to certification of its local coastal program, a local government does not exercise the option provided in subdivision (b), or a development is not subject to the requirements of subdivision (b), a coastal development permit shall be obtained from the commission or from a local government as provided in subdivision (d).

(d) After certification of its local coastal program or pursuant to the provisions of Section 30600.5, a coastal development permit shall be obtained from the local government as provided for in Section 30519 or Section 30600.5.

As discussed, the City of Los Angeles has the authority to issue coastal development permits. The proposed project site is located within the *Single Permit Jurisdiction Area*. For the reasons discussed in detail above, the proposed project constitutes the demolition of a 1,768 square-foot attached duplex constructed in 1945 and construction of two new detached two-story units: one with 1,860 square feet of living space and the other with 1,3214 square feet of living space on top of a four car garage, with a swimming pool in between, which, in the Venice coastal zone is not exempt under any section or provision of the Coastal Act or the Commission's Regulations and require a coastal development permit. Therefore, the proposed project requires a local coastal development permit, processed by the City of Los Angeles. The appellants have expressed their concerns regarding the alleged inconsistencies between the proposed project's mass, scale and character with that of the surrounding community, and concerns about the project's Mello Act consistency. The local coastal development permit process is the process during which the proposed development will be reviewed for its consistency with the Coastal Act and local land use regulations.

Because the evidence does not support the City's action in exempting the proposed project from Coastal Act permitting requirements, *Coastal Exemption No. A-5-VEN-16-0034* is denied.

Appendix A – Substantive File Documents

1. City of Los Angeles Certified Land Use Plan for Venice (2001)
2. Appeal File A-5-VEN-16-0005
3. Appeal File A-5-VEN-16-0006



Vicinity Map: 632 Brooks Ave, Venice, Los Angeles

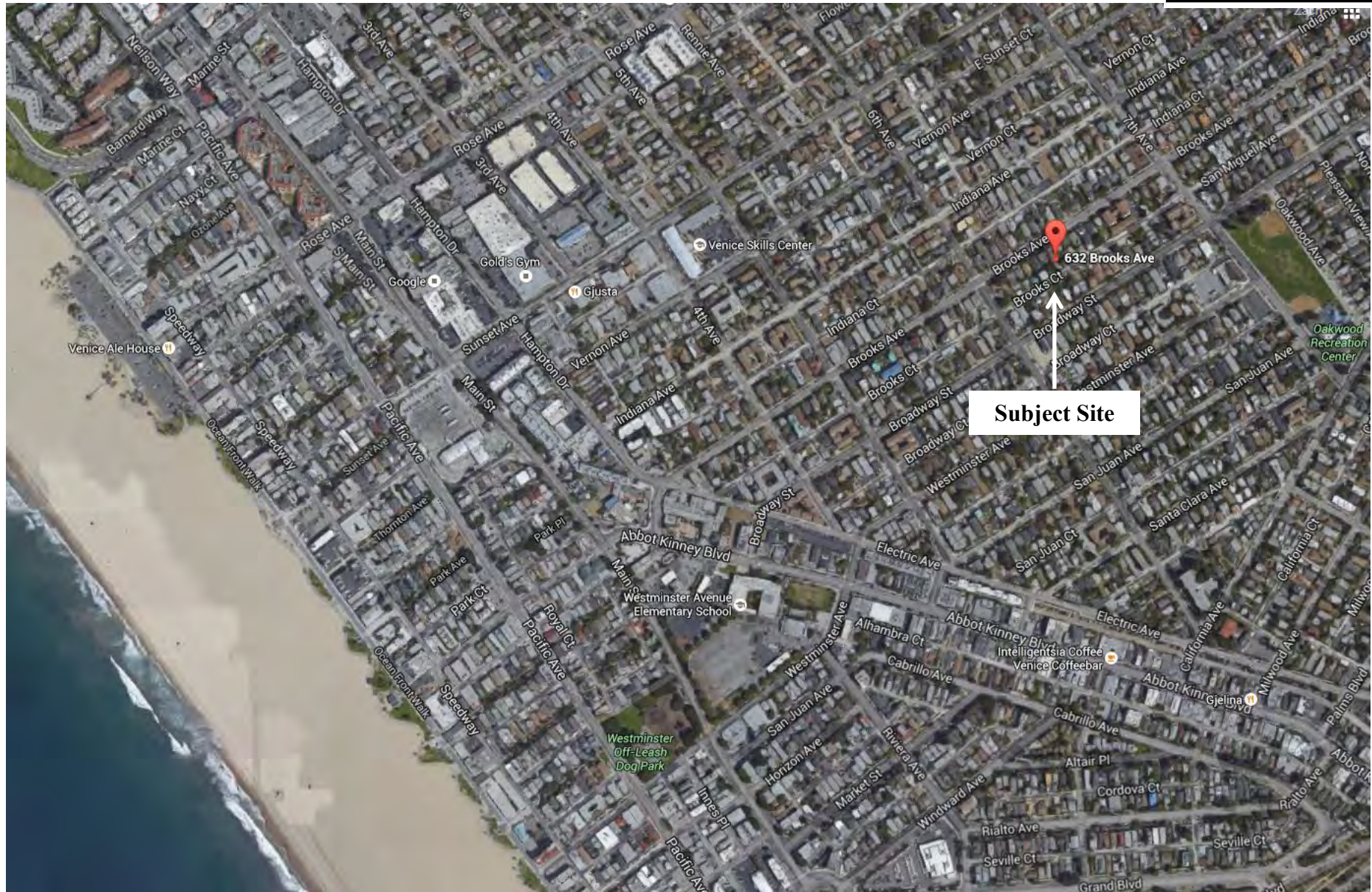


Photo credit: Google maps



Photo of 632 Brooks Avenue, Before Demolition



Photo credit: Google Maps

Photo of 632 Brooks Avenue, 3-10-2016

Exhibit 2

Page 2 of 3



California Coastal
Commission



Photo: California Coastal Commission staff

Photo of 632 Brooks Avenue, 3-10-2016

Exhibit 2

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California Coastal
Commission

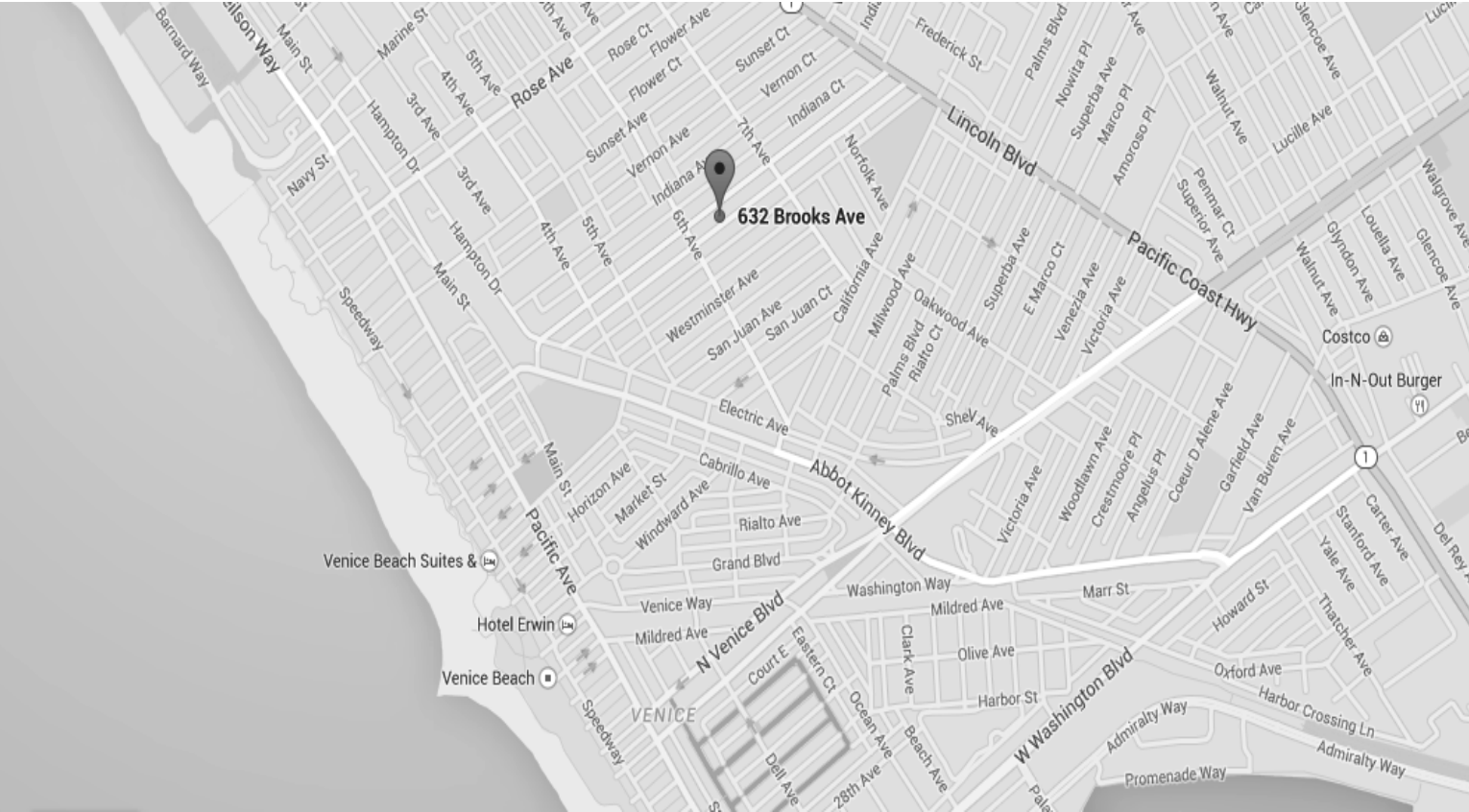


Photo: California Coastal Commission staff

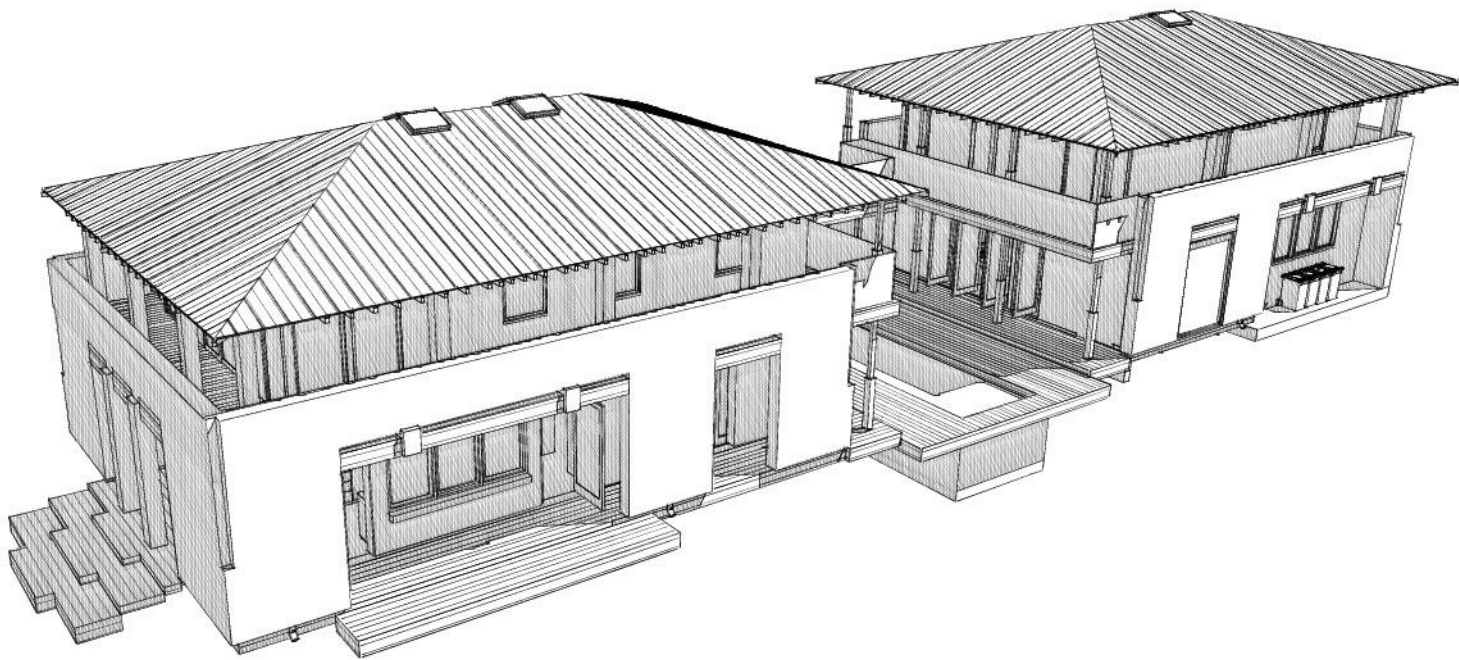
632 BROOKS AVE RESIDENCE



PARCEL MAP



AREA MAP



PROJECT INFORMATION

| | | | |
|-------------------|---|--------------------|---------------------|
| OWNER | OLIVER DAMAVANDI | LOT | 14 |
| ADDRESS | 632 BROOKS AVE. VENICE BEACH CA, 90291 | BLOCK | K |
| ZONING DISTRICT | RD 1.5 | PARCEL AREA | 5,194.3 SQ.FT. |
| ZONING ORDINANCES | LOS ANGELES MUNICIPAL CODE | SPECIFIC PLAN AREA | VENICE COASTAL ZONE |
| APN | 4239012015 | YEAR BUILT | 1945 |
| TRACT | OCEAN PARK VILLA TRACT | | |

PROJECT DESCRIPTION

THE SCOPE OF THIS PROJECT INCLUDES THE RENOVATION OF AND THE ADDITION TO AN EXISTING 1,806 SQ. FT. 4 BEDROOM, 2 BATHROOM DUPLEX. THE EXISTING DUPLEX CONSISTS OF 2 (TWO), 2 BEDROOM, 1 BATHROOM UNITS STACKED ON TOP OF EACH OTHER, WITH AN EXISTING WRAP AROUND DECK ON BOTH STORIES. THERE IS CURRENTLY NO COVERED PARKING SPACES. THE ADDITION INCLUDES A 2 CAR GARAGE, WITH A NEW, 1 BEDROOM, 1 BATHROOM UNIT ABOVE. THE EXISTING STRUCTURE WILL BE CONVERTED INTO ONE UNIT, WITH 4 BEDROOMS, 3 BATHROOMS, AND WILL HAVE A HALLWAY ON THE FIRST LEVEL CONNECTING TO THE NEW STRUCTURE TOWARDS THE ALLEY. BETWEEN THE TWO STRUCTURES WILL BE A NEW POOL AND SPA. THE BACK OF THE SITE WILL PROVIDE ENOUGH PARKING FOR 3 COMPACT SPOTS. THE PROJECT WILL RETAIN OVER 50% OF THE EXISTING EXTERIOR WALLS, AS WELL AS THE ROOF LINES - THE HEIGHT OF THE EXISTING STRUCTURE WILL REMAIN AS IS, AND THE NEW STRUCTURE WILL BE THE SAME HEIGHT AS EXISTING.

GENERAL NOTES

1. DO NOT SCALE DRAWINGS. ALL DIMENSIONS TO TAKE PRECEDENCE OVER SCALE SHOWN ON DRAWING.
2. SPECIFIC NOTES AND DETAILS SHALL TAKE PRECEDENCE OVER GENERAL NOTES AND DETAILS.
3. PERMITS AND INSPECTIONS: THE OWNER SHALL PAY FOR ALL PLAN CHECKING AND BUILDING PERMIT FEES.
4. ALL WORK SHALL CONFORM TO THE REQUIREMENTS OF THE UNIFORM BUILDING CODE, LATEST EDITION, A.S.T.M. SPECIFICATIONS, AND ALL OTHER APPLICABLE REQUIREMENTS, ORDERS, ORDINANCES AND REGULATIONS. WHERE CONFLICTS BETWEEN BUILDING CODES AND SPECIFICATIONS OCCUR, THE MOST STRINGENT REQUIREMENTS SHALL GOVERN.
5. THE CONTRACTOR SHALL VERIFY ALL CONSTRUCTION DOCUMENTS, SITE DIMENSIONS AND CONDITIONS PRIOR TO STARTING WORK AND SHALL NOTIFY THE ARCHITECT OF ANY DISCREPANCIES OR INCONSISTENCIES.
6. THE CONTRACTORS SHALL ARRANGE FOR ALL TESTING AND INSPECTION REQUIRED BY APPLICABLE CODES, ORDINANCES, AND DIRECTIVES OF THE GOVERNING BUILDING OFFICIAL. THE OWNER WILL PAY ALL COSTS FOR SUCH TESTING AND INSPECTIONS IF THE TESTS INDICATE CONFORMANCE. THE CONTRACTOR SHALL PAY COSTS WHEN TESTS AND INSPECTIONS INDICATE NON-CONFORMANCE.
7. THE SCOPE OF WORK FOR EACH DIVISION SHALL INCLUDE ALL LABOR, MATERIALS, APPLIANCE, EQUIPMENT AND FACILITIES NECESSARY TO DO ALL OF THE WORK INDICATED IN THE DRAWINGS AND SPECIFIED THEREIN.
8. IT SHALL BE THE CONTRACTORS RESPONSIBILITY TO NOTIFY THE ARCHITECT OF ANY INCONSISTENCIES IN THE CONSTRUCTION DOCUMENTS DISCOVERED WHILE BIDDING AND CLARIFICATION SHALL BE MADE PRIOR TO THE START OF CONSTRUCTION.

9. THE CONSTRUCTION DOCUMENTS REPRESENT THE FINISHED STRUCTURE UNLESS NOTED OR SHOWN. THEY DO NOT INDICATE THE METHOD OF CONSTRUCTION. THE CONTRACTOR SHALL SUPERVISE AND DIRECT THE WORK TO COMPLETION OF THE PROJECT AS INDICATED IN THE DRAWINGS AND SPECIFICATIONS AND SHALL BE SOLELY RESPONSIBLE FOR ALL CONSTRUCTION MEANS, METHODS AND PROCEDURES.
10. APPLICABLE TRADES SHALL USE A COMMON DATUM WALL TO BE DESIGNATED BY THE CONSTRUCTION SUPERVISOR FOR ALL CRITICAL MEASUREMENTS.
11. ALL SHOP DRAWINGS SHALL BE SUBMITTED TO ARCHITECT FOR APPROVAL PRIOR TO FABRICATION.
12. MATERIAL AND PAINT COLORS TO BE SELECTED BY ARCHITECT PRIOR TO FABRICATION.
13. CONTRACTOR SHALL LOCATE ALL UNDERGROUND UTILITIES PRIOR TO THE START OF CONSTRUCTION. WHERE UTILITIES ARE ENCOUNTERED OTHER THAN THOSE KNOWN AND SHOWN, IMMEDIATELY NOTIFY THE OWNER, AND ENTER INTO NEGOTIATION FOR THE PERFORMANCE OF THE REQUIRED WORK, WHICH SHALL BE OVER AND ABOVE THE AMOUNT OF THE BID PROPOSAL. ANY REQUIRED REROUTING OF EXISTING UTILITY SERVICE SHALL BE APPROVED BY THE LOCAL UTILITY COMPANY PRIOR TO COMMENCING THAT WORK.
14. EXAMINE THE CONTRACT DOCUMENTS TO DETERMINE THE EXTENT OF THE EXISTING ELEMENTS TO REMAIN. WHERE QUESTIONS OR DISCREPANCIES ARISE, CONSULT THE ARCHITECT ABOUT THE EXTENT AND/OR INTENT OF THE REQUIRED DIRECTION BEFORE COMMENCING WORK.
16. UNLESS OTHERWISE SPECIFIED HEREIN, THE CONTRACTORS, UPON COMPLETION OF THE ENTIRE WORK DESCRIBED IN THE CONTRACT, SHALL PROVIDE THE OWNER WITH A WRITTEN GUARANTEE STATING

- THAT ALL WORK PERFORMED AS PART OF THE CONTRACT IS FULLY GUARANTEED FOR A PERIOD OF ONE YEAR FROM THE DATE OF ACCEPTANCE, AND THAT DURING SAID ONE YEAR PERIOD, ALL DEFECTIVE WORKMANSHIP AND/OR MATERIALS SHALL BE REPAIRED AND/OR REPLACED IN PLACE INCLUDING ANY WORK OF OTHERS WHICH HAS BEEN DAMAGED BY SUCH DEFECTIVE WORKMANSHIP AND/OR MATERIALS AND BY THE REPAIR AND/OR REPLACEMENT OF SUCH WORKMANSHIP AND/OR MATERIALS, AT NO ADDITIONAL COST TO THE OWNER.
17. THE CONTRACTOR SHALL REMOVE ALL DEBRIS AND RUBBISH RESULTING FROM THEIR PORTION OF THE WORK SPECIFIED HEREIN AND DEPOSIT IT IN AN ON-SITE CONTAINER, PROVIDED BY THE CONTRACTOR.
18. WHEREVER EXISTING WORK IS DAMAGED BY REMOVAL OF ADJACENT WORK OR ANY OTHER CONSTRUCTION OPERATION, IT SHALL BE REPAIRED OR REPLACED WITH NEW MATERIALS TO MATCH EXISTING AS APPROVED BY THE ARCHITECT.
19. DURING CONSTRUCTION THE CONTRACTOR SHALL PROVIDE FIRE EXTINGUISHERS AS REQUIRED BY THE FIRE DEPARTMENT.
20. EACH CONTRACTOR SHALL MAINTAIN GENERAL LIABILITY INSURANCE FOR THE DURATION OF THE CONTRACT WITH MINIMUM BODILY INJURY LIMITS OF \$500,000 FOR EACH PERSON AND \$500,000 FOR EACH ACCIDENT, AND SHALL MAINTAIN PROPERTY DAMAGE INSURANCE MINIMUM LIMITS OF \$500,000 FOR RESPECTS LIABILITY INSURANCE. EACH CONTRACTOR SHALL MAINTAIN WORKER'S COMPENSATION INSURANCE IN FULL COMPLIANCE WITH ALL LOCAL AND STATE LAWS AND ANY AMENDMENTS THERETO. THE OWNER SHALL PROVIDE FIRE, E.C.E. AND VANDALISM INSURANCE AT HIS OWN EXPENSE. THE GENERAL CONTRACTOR AND FRAMING CONTRACTOR SHALL BE NAMED AS ADDITIONAL INSURED AS RESPECTS THE INSURANCE POLICY.
21. ALL NEW GLAZING SHALL COMPLY WITH STANDARDS OF THE U.S. CONSUMER PRODUCT SAFETY COMMISSION. MANUFACTURER TO SUPPLY CERTIFICATE OF COMPLIANCE TO OWNER.

AREA CALCULATIONS :

| | |
|--|--------------------------|
| GROSS SQUARE FOOTAGE (BUILDING CODE DEFINITION) | |
| EXISTING 1 ST AND 2 ND STORY | |
| BUILDING TOTAL: | 1,806 SQ. FT. |
| EXISTING 1 ST FLOOR: | 922 SQ. FT. |
| EXISTING 2 ND FLOOR: | 884 SQ. FT. |
| 1 ST FLOOR ADDITION: | 694.875 SQ. FT. |
| 2 ND FLOOR ADDITION: | 700 SQ. FT. |
| GARAGE ADDITION: | 675.75 SQ. FT. |
| TOTAL NEW AREA: | 2,070.625 SQ. FT. |
| TOTAL GROSS AREA: | 3,876.625 SQ. FT. |

| | |
|------------------------|-------------------|
| UNIT 1 NEW: | 1,859.75 SQ. FT. |
| UNIT 2 NEW: | 1,314.125 SQ. FT. |
| TOTAL NEW DECK SPACE: | |
| 1 ST FLOOR: | 582 SQ. FT. |
| 2 ND FLOOR: | 1,330 SQ. FT. |
| TOTAL NEW DECK SPACE: | 1,912 SQ. FT. |
| TOTAL POOL SQ. FT.: | 210 SQ. FT. |

NET SQUARE FOOTAGE (ZONING CODE DEFINITION)

| | |
|------------------------|----------------------|
| 1 ST FLOOR: | 1,593 SQ. FT. |
| 2 ND FLOOR: | 1,394 SQ. FT. |
| TOTAL NET AREA: | 2,987 SQ. FT. |

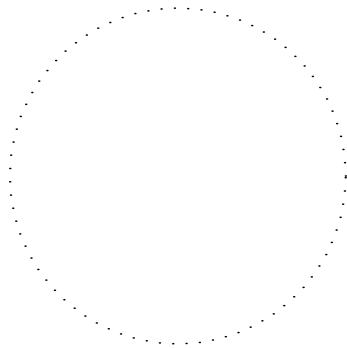
PROJECT TEAM

| | | |
|----------------------|--|----------------|
| OWNER | OLIVER DAMAVANDI 632 BROOKS AVE. VENICE BEACH CA, 90291 | P 310 801-8335 |
| ARCHITECTURAL DESIGN | ARCHIVE DESIGN GROUP, LLC 5225 WILSHIRE BLVD # 314 LOS ANGELES, CA 90036 | P 310 666-6093 |
| STRUCTURAL ENGINEERS | STUART TOMENY, STRCT. ENG. 3892 VIA REAL CARPENTERIA, CA 93013 | P 805 895-5242 |

22. CONTRACTOR IS TO PROVIDE 3 COPIES OF SHOP DRAWINGS FOR ALL WOODWORK, COUNTERS, CABINETS, SPECIALTIES, AND METALWORK AND ALL MECHANICAL AND ELECTRICAL LAYOUTS AND DETAILS FOR ARCHITECT'S APPROVAL.
23. SUBSTITUTIONS, REVISIONS OR CHANGES MAY BE ALLOWED ONLY IF SUCH ITEMS ARE SUBMITTED TO THE ARCHITECT IN A TIMELY MANNER IN WRITING AND SUBSEQUENTLY APPROVED BY THE ARCHITECT IN WRITING. ALL SUBSTITUTIONS MUST BE AT LEAST OF EQUAL QUALITY, DESIGN AND PERFORMANCE. THE CONTRACTOR IS LIABLE FOR REPLACEMENT, REPAIR AND DELAYS CAUSED BY ANY UNAUTHORIZED SUBSTITUTION OF ANY ITEM FOR THIS PROJECT. ALL REQUESTS FOR SUBSTITUTIONS SHALL INCLUDE THE PROJECT NAME, DESCRIPTION OF THE ITEM, REASON FOR SUBSTITUTION AND COMPLETE SPECIFICATIONS AND DRAWINGS AS REQUIRED FOR COMPARABLE ITEMS. THE ARCHITECT RESERVES THE RIGHT TO REJECT ANY REQUEST.
24. CATALOG CUTS OF ALL LIGHT FIXTURES, ACCESSORIES AND EQUIPMENT REQUIRED SHALL BE SUBMITTED IN TRIPLICATE TO THE ARCHITECT FOR APPROVAL.
25. TAKE PRECAUTION TO PROVIDE NECESSARY BARRICADES AND/OR SHORING DURING THE COURSE OF DEMOLITION. IF AT ANY TIME THE SAFETY OF THE ADJACENT STRUCTURE OF PERSONNEL WOULD APPEAR TO BE ENDANGERED, CEASE OPERATION AND NOTIFY OWNER. DO NOT RESUME OPERATION UNTIL SAFE CONDITIONS HAVE BEEN RE-ESTABLISHED AND PERMISSION BY THE OWNER HAS BEEN GRANTED TO RESUME OPERATION.
26. ALL ELECTRICAL, PLUMBING, MECHANICAL AND STRUCTURAL WORKS SHALL CONFORM TO THE REQUIREMENTS OF ALL LEGALLY CONSTITUTED AUTHORITIES HAVING JURISDICTION.
27. ALL ADJUNCTIVE DOCUMENTATION IS CONSIDERED A PART OF THIS DOCUMENT.
28. REFER TO ADDITIONAL GENERAL AND SPECIFIC NOTES CONTAINED IN THE VARIOUS CONSULTANT SECTIONS OF THESE DRAWINGS.
29. CONTRACTOR SHALL OBTAIN THE OWNER'S APPROVAL FOR LOADING SPACES, CONSTRUCTION SHEDS, BUILDING MATERIALS STORAGE AND EQUIPMENT ON SITE.

ADG

ARCHIVE DESIGN GROUP
5225 WILSHIRE BLVD. SUITE 314
LOS ANGELES, CA 90036



BROOKS AVE RESIDENCE

632 BROOKS AVE
VENICE BEACH, CA
90291

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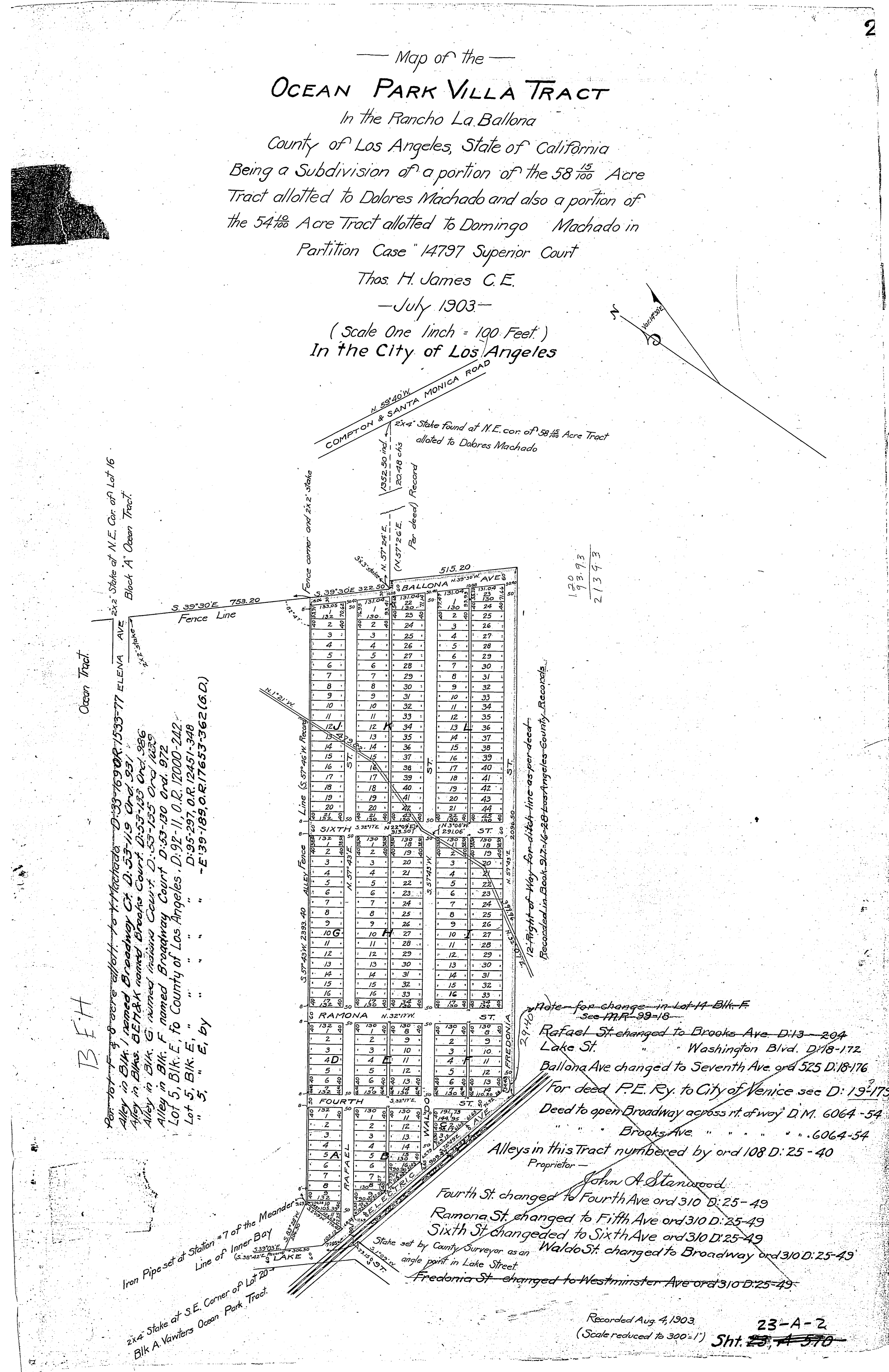
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SHEET 1 OF 32

ENERGY NOTES

1. THIS PROJECT COMPLIES WITH TITLE 24 ENERGY REQUIREMENTS.
2. ALL EXTERIOR WALL ASSEMBLIES SHALL BE INSULATED WITH BLANKET TYPE MINERAL OR GLASS FIBER INSULATION WITH A THERMAL RESISTANCE (R) OR NOT LESS THAN 19.
3. ALL ROOF AND CEILING ASSEMBLIES SHALL BE INSULATED WITH BLANKET TYPE MINERAL OR GLASS FIBER INSULATION WITH A THERMAL RESISTANCE (R) OF NOT LESS THAN 30.
4. ALL INSULATION MATERIALS SHALL BE CERTIFIED BY THE MANUFACTURER AS COMPLYING WITH FEDERAL SPECIFICATION HH-1-52IE AND CALIFORNIA QUALITY STANDARDS. IN NO CASE SHALL ANY INSULATION OR OTHER BUILDING MATERIAL CONTAIN ANY ASBESTOS OR ASBESTOS RELATED PROD-UCT.
5. THE INSULATION INSTALLER SHALL POST IN A CONSPICUOUS LOCATION IN THE BUILDING A CERTIFICATE SIGNED BY THE INSTALLER AND THE CONTRACTOR STATING THAT THE INSTALLATION CONFORMS TO THE REQUIREMENTS OF TITLE 24, PART 2, CHAPTER 2-53, AND THAT THE MATERIALS INSTALLED CONFORM WITH THE REQUIREMENTS OF TITLE 20, CHAPTER 2, SUBCHAPTER 4, ARTICLE 3.
6. THE CONTRACTOR SHALL PROVIDE THE OWNER WITH A LIST OF THE HEATING, COOLING, WATER HEATING, LIGHTING SYSTEMS AND CONSERVATION OR SOLAR DEVICES INSTALLED IN THE BUILDING AND INSTRUCTIONS ON HOW TO USE THEM EFFICIENTLY.
7. A MAINTENANCE LABEL SHALL BE AFFIXED TO ALL EQUIPMENT REQUIRING PREVENTIVE MAINTENANCE AND A COPY OF THE MAINTENANCE INSTRUCTIONS SHALL BE PROVIDED FOR THE OWNER'S USE.
8. DOORS, WINDOWS AND ACCESS HATCHED BETWEEN CONDITIONED AND OUTSIDE OR UNCONDITIONED SPACES SUCH AS EQUIPMENT ROOMS SHALL BE FULLY WEATHERSTRIPPED.
9. MANUFACTURED DOORS AND WINDOWS SHALL BE CERTIFIED AND LABELED IN COMPLIANCE WITH THE APPROPRIATE STANDARDS LISTED IN TABLE 2-53V OF THE ENERGY REGULATIONS.
10. THE FOLLOWING OPENINGS IN THE BUILDING ENVELOPE MUST BE CAULKED, SEALED OR WEATHERSTRIPPED.
- A. EXTERIOR JOINTS AROUND WINDOW AND DOOR FRAMES BETWEEN WALL SILL PLATES AND FLOORS AND BETWEEN EXTERIOR WALL PANELS.
- B. OPENINGS FOR PLUMBING, ELECTRICAL AND GAS LINES IN EXTERIOR AND INTERIOR WALLS, CEILINGS, AND FLOOR.
- C. ALL OTHER SUCH OPENINGS IN THE BUILDING ENVELOPE.
11. FAN SYSTEMS EXHAUSTING AIR FROM THE BUILDING SHALL BE PROVIDED WITH BACKDRAFT DAMPERS.
12. THERMOSTATICALLY CONTROLLED HEATING OR COOLING SYSTEMS SHALL HAVE AN AUTO-MATIC THERMOSTAT WITH A CLOCK MECHANISM WHICH CAN BE PROGRAMMED TO AUTOMATICALLY SET BACK THE THERMOSTAT SET POINTS FOR AT LEAST 2 PERIODS WITHIN 24 HOURS.
13. STORAGE TYPE WATER HEATERS AND STORAGE BACKUP TANKS FOR SOLAR WATER HEATING SYSTEMS SHALL BE EXTERNALLY WRAPPED IN INSULATION WITH A THERMAL RESISTANCE OF NOT LESS THAN R-12.
14. PIPING IN UNCONDITIONED SPACE LEADING TO AND FROM WATER HEATERS SHALL BE WRAPPED WITH INSULATION HAVING A THERMAL RESISTANCE OF NOT LESS THAN R-3 FOR THE 5 FEET OF PIPE CLOSEST TO THE WATER HEATER.
15. RECIRCULATING HOT WATER PIPING IN UNCONDITIONED SPACE SHALL BE INSULATED.
16. SPACE HEATING EQUIPMENT, WATER HEATERS, HOUSEHOLD COOKING APPLIANCES, PLUMBING FIXTURES INCLUDING SHOWER HEADS AND FAUCETS SHALL COMPLY WITH CALIFORNIA ENERGY STANDARDS.
17. WATER CLOSETS SHALL BE LOW FLUSH TYPE A REQUIRED BY CALIFORNIA ENERGY STANDARDS. 18. GAS FIRED APPLIANCES SHALL HAVE INTERMITTENT IGNITION DEVICES. CONTINUOUSLY BURNING PILOT LIGHTS ARE PROHIBITED. 19. DUCTS SHALL BE CONSTRUCTED, INSTALLED AND INSULATED ACCORDING TO CHAPTER 10 OF THE CALIFORNIA MECHANICAL CODE, LATEST EDITION.
20. GENERAL LIGHTING FOR KITCHEN AND BATHROOMS MUST HAVE AN EFFICIENCY OF NOT LESS THAN 25 LUMENS PER WATT. FLUORESCENT TYPE LIGHTING WILL MEET THIS REQUIREMENT.
21. ELECTRICAL GASKET COVERS SHALL BE USED ON ALL EXTERIOR WALLS WHERE APPLICABLE.
22. ALL INSULATING MATERIALS SHALL BE INSTALLED IN COMPLIANCE WITH THE FLAME SPREAD RATING AND SMOKE DENSITY REQUIREMENTS OF SECTIONS 1712 AND 1713 OF THE UNIFORM BUILDING CODE.
23. SITE CONSTRUCTED DOORS, WINDOWS, AND SKYLIGHTS SHALL BE CAULKED BETWEEN THE UNIT AND THE BUILDING AND SHALL BE WEATHERSTRIPPED (EXCEPT FOR UNFRAMED GLASS DOORS AND FIRE DOORS).
24. DEMISING WALLS SHALL BE INSTALLED TO R-VALUE OF AT LEAST R-11 IN ALL OPAQUE PORTIONS OF FRAMED WALLS (INTERIOR WALLS THAT SEPARATE CONDITIONED AREA AND UNCONDITIONED SPACE).

TRACT MAP



ADDITIONAL NOTES

1. THE CONSTRUCTION SHALL NOT RESTRICT A FIVE-FOOT CLEAR AND UNOBSTRUCTED ACCESS TO ANY WATER OR POWER DISTRIBUTION FACILITIES (POWER POLES, PULL-BOXES, TRANSFORMERS, VAULTS, PUMPS, VALVES, METERS, APPURTENANCES, ETC.) OR TO THE LOCATION OF THE HOOK-UP THE CONSTRUCTION SHALL NOT BE WITHIN TEN FEET OF ANY POWER LINES-WHETHER OR NOT THE LINES ARE LOCATED ON THE PROPERTY. FAILURE TO COMPLY MAY CAUSE CONSTRUCTION DELAYS AND/OR ADDITIONAL EXPENSES.
2. AN APPROVED SEISMIC GAS SHUTOFF VALVE WILL BE INSTALLED ON THE FUEL GAS LINE ON THE DOWNSTREAM SIDE OF THE UTILITY METER AND BE RIGIDLY CONNECTED TO THE EXTERIOR OF THE BUILDING OR STRUCTURE CONTAINING THE FUEL GAS PIPING. (PER ORDINANCE 170158) (SEPARATE PLUMBING PERMIT IS REQUIRED)
3. PLUMBING FIXTURES ARE REQUIRED TO BE CONNECTED TO A SANITARY SEWER OR TO AN APPROVED SEWAGE DISPOSAL SYSTEM (R306.3).
4. KITCHEN SINKS, LAVATORIES, BATHTUBS, SHOWERS, BIDETS, LAUNDRY TUBS AND WASHING MACHINE OUTLETS SHALL BE PROVIDED WITH HOT AND COLD WATER AND CONNECTED TO AN APPROVED WATER SUPPLY (R306.4).
5. BATHTUB AND SHOWER FLOORS, WALLS ABOVE BATHTUBS WITH A SHOWERHEAD, AND SHOWER COMPARTMENTS SHALL BE FINISHED WITH A NONABSORBENT SURFACE. SUCH WALL SURFACES SHALL EXTEND TO A HEIGHT OF NOT LESS THAN 6 FEET ABOVE THE FLOOR (R307.2).
6. PROVIDE ULTRA-LOW FLUSH WATER CLOSETS FOR ALL NEW CONSTRUCTION. EXISTING SHOWER HEADS AND TOILETS MUST BE ADAPTED FOR LOW WATER CONSUMPTION.
7. UNIT SKYLIGHTS SHALL BE LABELED BY A LA CITY APPROVED LABELING AGENCY. SUCH LABEL SHALL TOWNHOUSE: STATE THE APPROVED LABELING AGENCY NAME, PRODUCT DESIGNATION AND PERFORMANCE GRADE RATING. (RESEARCH REPORT NOT REQUIRED) (R308.6.9)
8. WATER HEATER MUST BE STRAPPED TO WALL. (SEC. 5073, LAPC)
9. FOR EXISTING POOL ON SITE, PROVIDE AN ALARM FOR DOORS TO THE DWELLING THAT FORM A PART OF THE POOL ENCLOSURE. THE ALARM SHALL SOUND CONTINUOUSLY FOR A MIN. OF 30 SECONDS WHEN THE DOOR IS OPENED. IT SHALL AUTOMATICALLY RESET AND BE EQUIPPED WITH A MANUAL MEANS TO DEACTIVATE (FOR 15 SECS. MAX.) FOR A SINGLE OPENING. THE DEACTIVATION SWITCH SHALL BE AT LEAST 54" ABOVE THE FLOOR. (6109 OF LABC)
10. FOR EXISTING POOL ON SITE, PROVIDE ANTI-ENTRAPMENT COVER MEETING THE CURRENT ASTM OR ASME FOR THE SUCTION OUTLETS OF THE SWIMMING POOL, TODDLER POOL AND SPA FOR SINGLE FAMILY DWELLINGS PER ASSEMBLY BILL (AB) NO. 2977 (3162B)
11. AUTOMATIC GARAGE DOOR OPENERS, IF PROVIDED, SHALL BE LISTED IN ACCORDANCE WITH UL 325. (R309.4)
12. SMOKE DETECTORS SHALL BE PROVIDED FOR ALL DWELLING UNITS INTENDED FOR HUMAN OCCUPANCY, UPON THE OWNER'S APPLICATION FOR A PERMIT FOR ALTERATIONS, REPAIRS, OR ADDITIONS, EXCEEDING ONE THOUSAND DOLLARS (\$1,000). (R314.6.2)
13. WHERE A PERMIT IS REQUIRED FOR ALTERATIONS, REPAIRS OR ADDITIONS EXCEEDING ONE THOUSAND DOLLARS (\$1,000), EXISTING DWELLINGS OR SLEEPING UNITS THAT HAVE ATTACHED GARAGES OR FUEL-BURNING APPLIANCES SHALL BE PROVIDED WITH A CARBON MONOXIDE ALARM IN ACCORDANCE WITH SECTION R315.2. CARBON MONOXIDE ALARMS SHALL ONLY BE REQUIRED IN THE SPECIFIC DWELLING UNIT OR SLEEPING UNIT FOR WHICH THE PERMIT WAS OBTAINED. (R315.2.2)
14. EVERY SPACE INTENDED FOR HUMAN OCCUPANCY SHALL BE PROVIDED WITH NATURAL LIGHT BY MEANS OF EXTERIOR GLAZED OPENINGS IN ACCORDANCE WITH SECTION R303.1 OR SHALL BE PROVIDED WITH ARTIFICIAL LIGHT THAT IS ADEQUATE TO PROVIDE AN AVERAGE ILLUMINATION OF 6 FOOT-CANDLES OVER THE AREA OF THE ROOM AT A HEIGHT OF 30 INCHES ABOVE THE FLOOR LEVEL. (R303.1)
15. A COPY OF THE EVALUATION REPORT AND/OR CONDITIONS OF LISTING SHALL BE MADE AVAILABLE AT THE JOB SITE VEHICLES SHALL BE SLOPED TO A DRAIN OR TOWARD THE MAIN VEHICLE ENTRY DOORWAY. (R309.1)

ADG

ARCHIVE DESIGN GROUP
5225 WILSHIRE BLVD. SUITE 314
LOS ANGELES, CA 90036

BROOKS AVE RESIDENCE

632 BROOKS AVE
VENICE BEACH, CA
90291

632 E Brooks Ave

Application #: 15014 - 30000 - 02234
Plan Check #: B15W102685
Event Code: Printed: 05/22/15 08:34 AM

City of Los Angeles - Department of Building and Safety
APPLICATION FOR BUILDING PERMIT
AND CERTIFICATE OF OCCUPANCY
Last Status: Application Submittal
Status Date: 05/22/2015

1. TRACT BLOCK LOT
OCEAN PARK VILLA TRACT K 14

2. SENSITIVE PARCEL
M B 4-23 108B145 118 4239 - 012 - 015

3. PARCEL INFORMATION
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Venice
Community Plan Area - Venice
JURISDICTION: RH 5-1

4. RECORDS
Z1 - 252000 Dir Inter of Venice SP for S ORD - ORD-121312
SPA - Los Angeles Coastal Transportation ORD-164844-SAI290
RENT - YES
ORD - ORD-164899
ORD - ORD-172019

5. CHECKLIST ITEMS

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION
(Owner(s))
Tenant:
Applicant (Relationship: Agent for Owner)
ZORAN PEVEZ - (310) 666-6093

7. KANSAS LISA PROPOSED LISA

8. DISCREPANCY OF WORK
addition and remodel of (1) 1800 of duplex, add approx 2100 of retaining 2 units, add 2 covered parking and pool

9. 4 Blk 400 Site & Use

10. APPLICATION PROCESSING INFORMATION
BLDG PC By:
OK for Curbwork
Signature: Date:

11. PROJECT VALUATION & FEE INFORMATION
Submittal Fee Paid
Permit Valuation: \$600,000
PC Valuation:
SUBMITTAL TOTAL Bldg-Addn 4,771.66
Energy Surcharge 2,667.60
Plan Check Submittal Bldg-Addn 1,133.80
Offshore Plan Check 80.03
O.S. Surcharge 240.08
Planning Surcharge 240.08
Planning Surcharge Misc Fee 10.00
Planning Gen. Plan Maint Surcharge 200.07
Green Building

12. ATTACHMENTS
Sheet 1 of 2
Total Books: 2

For Inspection requests, call toll-free (888) LAHUTED (524-2845)
Outside LA County, call (213) 482-0000 or request inspection via
www.ladbs.org. To speak to a Call Center agent, call 311, Outside
LA County, call (213) 475-5231.

For Cashier's Use Only
W/O #: 51402234

PROJECT CODE: BRO
DATE: 10/13/15

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2015

SHEET TITLE
NOTES

G-1.1
SHEET 2 OF 32



STORM WATER POLLUTION CONTROL
(2014 Los Angeles Green Building Code)

FORM GRN 1

Storm Water Pollution Control Requirements for Construction Activities
Minimum Water Quality Protection Requirements for All Construction Projects

The following notes shall be incorporated in the approved set of construction/grading plans and represents the minimum standards of good housekeeping which must be implemented on all construction projects.

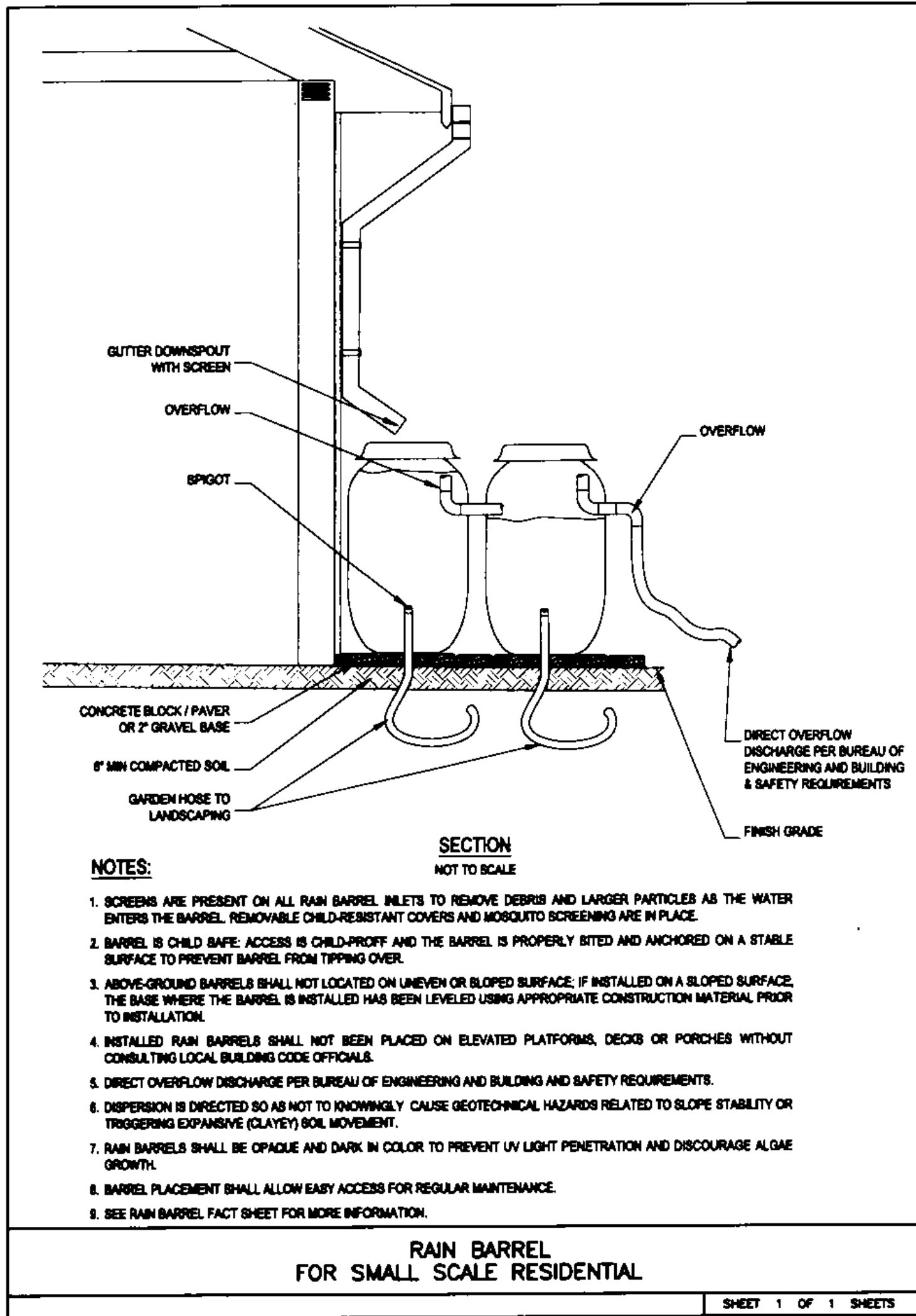
Construction means constructing, clearing, grading or excavation that result in soil disturbance. Construction includes structure teardown (demolition). It does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of facility; emergency construction activities required to immediately protect public health and safety; interior remodeling with no outside exposure of construction material or construction waste to storm water; mechanical permit work; or sign permit work. (Order No. 01-182, NPDES Permit No. CAS004001 – Part 5: Definitions)

- Eroded sediments and pollutants shall be retained on site and shall not be transported from the site via sheet flow, swales, area drains, natural drainage or wind.
- Stockpiles of earth and other construction-related materials shall be covered and/or protected from being transported from the site by wind or water.
- Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and shall not contaminate the soil nor the surface waters. All approved toxic storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of properly and shall not be washed into the drainage system.
- Non-storm water runoff from equipment and vehicle washing and any other activity shall be contained on the project site.
- Excess or waste concrete may not be washed into the public way or any drainage system. Provisions shall be made to retain concrete waste on-site until it can be appropriately disposed of or recycled.
- Trash and construction -related solid wastes must be deposited into a covered receptacle to prevent contamination of storm water and dispersal by wind.
- Sediments and other materials shall not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the street/public ways. Accidental depositions must be swept up immediately and may not be washed down by rain or by any other means.
- Retention basins of sufficient size shall be provided to retain storm water runoff on-site and shall be properly located to collect all tributary site runoff.
- Where retention of storm water runoff on-site is not feasible due to site constraints, runoff may be conveyed to the street and the storm drain system provided that an approved filtering system is installed and maintained on-site during the construction duration.

Revised 01-01-2014

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2014 Los Angeles Green Building Code

FORM GRN 9

MANDATORY REQUIREMENTS CHECKLIST

ADDITIONS AND ALTERATIONS TO RESIDENTIAL BUILDINGS

(COMPLETE AND INCORPORATE THIS FORM INTO THE PLANS)

Project Address: 632 BROOKS AVE., VENICE, CA Date: 09/22/15

| ITEM # | CODE SECTION | REQUIREMENT | REFERENCE SHEET (Sheet # or N/A) | COMMENTS (e.g. note #, detail # or reason for N/A) |
|--|--------------|--|----------------------------------|--|
| PLANNING AND DESIGN | | | | |
| 1 | 4.106.2 | Storm water drainage and retention during construction | G-1.2 | FORM GRN 1 |
| 2 | 4.106.3 | Grading and paving | A-1.0 | SITE PLAN |
| 3 | 4.106.5 | Cool roof for reduction of heat island effect | G-1.2 | GRN 14/# 3 |
| WATER EFFICIENCY & CONSERVATION | | | | |
| 4 | 4.303.1 | Water conserving plumbing fixtures and fittings | G-1.2 | GRN 14/# 5 |
| 5 | 4.303.1.3.2 | Multiple showerheads serving one shower | G-1.2 | GRN 14/# 6 |
| 6 | 4.304.1 | Outdoor potable water use in landscape areas | G-1.2 | GRN 14/# 7 |
| 7 | 4.304.2 | Irrigation controllers | G-1.2 | GRN 14/# 7 |
| MATERIAL CONSERVATION & RESOURCE EFFICIENCY | | | | |
| 8 | 4.406.1 | Rodent proofing | G-1.2 | GRN 14/# 9 |
| 9 | 4.407.3 | Flashing details | A-6.0 | DETAIL 1, 4, 5, 6, 7 |
| 10 | 4.407.4 | Material protection | G-1.2 | GRN 14/# 10 |
| 11 | 4.408.1 | Construction waste reduction of at least 50% | G-1.2 | GRN 14/# 11 |
| 12 | 4.410.1 | Operation and maintenance manual | G-1.2 | GRN 14/# 12 |
| ENVIRONMENTAL QUALITY | | | | |
| 13 | 4.503.1 | Fireplaces and woodstoves | G-1.2 | GRN 14/# 13 |
| 14 | 4.504.1 | Covering of duct openings and protection of mechanical equipment during construction | G-1.2 | GRN 14/# 14 |
| 15 | 4.504.2 | Finish material pollutant control | G-1.2 | GRN 14/# 15 |
| 16 | 4.504.2.1 | - Adhesives, sealants, caulks | | |
| 17 | 4.504.2.2 | - Paints and coatings | | |
| 18 | 4.504.2.3 | - Aerosol paints and coatings | | |
| 19 | 4.504.2.4 | - Verification | G-1.2 | GRN 14/# 16 |
| 20 | 4.504.3 | Carpet systems | G-1.2 | GRN 14/# 17 |
| 21 | 4.504.3.1 | Carpet cushion | G-1.2 | GRN 14/# 18 |
| 22 | 4.504.4 | Resilient flooring systems | G-1.2 | GRN 14/# 19 |
| 23 | 4.504.5 | Composite wood products | G-1.2 | GRN 14/# 20 |
| 24 | 4.505.2.1 | Capillary break | G-1.2 | GRN 14/# 22 |
| 25 | 4.505.3 | Moisture content of building materials | G-1.2 | GRN 14/# 24 |
| 26 | 4.506.1 | Bathroom exhaust fans | G-1.2 | GRN 14/# 25 |
| 27 | 4.507.2 | Heating and air-conditioning system design | G-1.2 | GRN 14/# 27 |

Revised 07-01-2015

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2014 Los Angeles Green Building Code

FORM GRN 14

GREEN BUILDING CODE PLAN CHECK NOTES
RESIDENTIAL BUILDINGS

- For each new dwelling and townhouse, provide a minimum 1-inch diameter listed raceway that can accommodate a dedicated 208/240 volt branch circuit. The panel or subpanel shall have sufficient capacity to support at least Level 2 EVSE. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point. (4.106.4.1)
- EV spaces within the common parking area serving R-occupancies, shall have labels posted stating "EV CAPABLE" at both the EV charging space and at a conspicuous place at the service panel or subpanel. The electrical system shall have sufficient capacity to simultaneously charge all designated EV spaces at full rated amperage based on Level 2 EVSE. A separate electrical permit is required. (4.106.4.2)
- Roofs with slopes < 2:12 shall have an SRI value of at least 75 or both a 3-year solar reflectance of at least 0.63 and a thermal emittance of at least 0.75. Roofs with slopes > 2:12 shall have an SRI value of at least 16 or both a 3-year solar reflectance of at least 0.20 and a thermal emittance of at least 0.75. (4.106.5)
- The required hardscape used to reduce heat island effects shall have a solar reflectance value of at least 0.30 as determined per ASTM E918 or ASTM C1549. (4.106.7)
- The flow rates for all plumbing fixtures shall comply with the maximum flow rates in Section 4.303.1. (4.303.1)
- When a shower is served by more than one showerhead, the combined flow rate of all the showerheads controlled by a single valve shall not exceed 2.0 gallons per minute at 80psi, or the shower shall be designed to only allow one showerhead to be in operation at a time. (4.303.1.3.2)
- Installed automatic irrigation system controllers shall be weather- or soil-based controllers. (4.304.1)
- For projects that include landscape work, the *Landscape Certification*, Form GRN 12, shall be completed prior to final inspection approval. (State Assembly Bill No. 1881) (4.504.2.1)
- Annular spaces around pipes, electric cables, conduits, or other openings in the building's envelope at exterior walls shall be protected against the passage of rodents by closing such openings with cement mortar, concrete masonry, or metal plates. Piping prone to corrosion shall be protected in accordance with Section 313.0 of the Los Angeles Plumbing Code. (4.406.1)
- Materials delivered to the construction site shall be protected from rain or other sources of moisture. (4.407.4)
- Only a City of Los Angeles certified hauler will be used for hauling of construction waste. (4.408.1)
- For all new equipment, an Operation and Maintenance Manual including, at a minimum, the items listed in Section 4.410.1, shall be completed and placed in the building at the time of final inspection. (4.410.1)
- All new gas fireplaces must be direct-vent, sealed combustion type. Wood burning fireplaces are prohibited per AQMD Rule 445. (4.503.1, AQMD Rule 445)
- All duct and other related air distribution component openings shall be covered with tape, plastic, or sheet metal until the final startup of the heating, cooling and ventilating equipment. (4.504.1)
- Architectural paints and coatings, adhesives, caulks and sealants shall comply with the Volatile Organic Compound (VOC) limits listed in Tables 4.504.1-4.504.3. (4.504.2, 4.504.3)
- The *VOC Content Verification Checklist*, Form GRN 2, shall be completed and verified prior to final inspection approval. The manufacturer's specifications showing VOC content for all applicable products shall be readily available at the job site and be provided to the field inspector for verification. (4.504.2.4)
- All new carpet installed in the building interior shall meet the testing and product requirements of one of the following:
 - Carpet and Rug Institute's Green Label Plus Program
 - California Department of Public Health's Specification 01350
 - NSF/ANSI 140 at the Gold level
 - Scientific Certifications Systems Indoor Advantage® Gold(4.504.3)
- All new carpet cushion installed in the building interior shall meet the requirements of the Carpet and Rug Institute Green Label program. (4.504.3.1)
- 80% of the total area receiving resilient flooring shall comply with one or more of the following:
 - VOC emission limits defined in the CHPS High Performance Products Database
 - Products compliant with the CHPS criteria certified under the Greenguard Children & Schools program
 - Certification under the Resilient Floor Covering Institute (RFCI) FloorScore program
 - Meet the California Department of Public Health's Specification 01350(4.504.4)
- New hardwood plywood, particle board, and medium density fiberboard composite wood products used in the building shall meet the formaldehyde limits listed in Table 4.504.5. (4.504.5)
- The *Formaldehyde Emissions Verification Checklist*, Form GRN 3, shall be completed prior to final inspection approval. The manufacturer's specifications showing formaldehyde content for all applicable wood products shall be readily available at the job site and be provided to the field inspector for verification. (4.504.5)
- A 4-inch thick base of ½ inch or larger clean aggregate shall be provided for proposed slab on grade construction. (4.505.2.1)
- A vapor barrier shall be provided in direct contact with concrete for proposed slab on grade construction. (4.505.2.1)
- Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed until it is inspected and found to be satisfactory. (4.505.3)
- Newly installed bathroom exhaust fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building. Provide the manufacturer's cut sheet for verification. (4.506.1)
- Newly installed bathroom exhaust fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidistat which shall be readily accessible. (4.506.1)
- The heating and air-conditioning systems shall be sized and designed using ANSI/ACCA Manual S-2004, ANSI/ACCA 29-D-2009 or ASHRAE handbooks and have their equipment selected in accordance with ANSI/ACCA 36-S Manual S-2004. (4.507.2)

Revised 1-9-2015

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VOC AND FORMALDEHYDE LIMITS
2014 Los Angeles Green Building Code
(Incorporate this form into the plans)

FORM GRN 11

The tables below are taken from the 2014 Los Angeles Green Building Code Tables 4.504.1, 4.504.2, 4.504.3, 4.504.5, 5.504.4.1, 5.504.4.2, 5.504.4.3, 5.504.4.5

VOC CONTENT LIMITS FOR ARCHITECTURAL COATINGS^{1,2}

Less Water and Less Exempt Compounds

COATING CATEGORY^{3,4} CURRENT LIMIT

| | |
|-----------------------------|-----|
| Flat coatings | 50 |
| Nonflat coatings | 100 |
| Nonflat-high gloss coatings | 150 |

Specialty Coatings

| | |
|---|-----|
| Aluminum roof coatings | 400 |
| Basement specialty coatings | 400 |
| Bluminous roof coatings | 50 |
| Bluminous roof primers | 350 |
| Bond breakers | 350 |
| Concrete curing compounds | 350 |
| Concrete/masonry sealers | 100 |
| Driveway sealers | 50 |
| Dry fog coatings | 150 |
| Faux finishing coatings | 350 |
| Fire resistive coatings | 350 |
| Floor coatings | 100 |
| Form-release compounds | 250 |
| Graphic arts coatings (sign paints) | 500 |
| High temperature coatings | 420 |
| Industrial maintenance coatings | 250 |
| Low solids coatings | 120 |
| Magnesium cement coatings | 450 |
| Mastic texture coatings | 100 |
| Metallic pigmented coatings | 500 |
| Multicolor coatings | 250 |
| Pretreatment wash primers | 420 |
| Primers, sealers, and undercoaters | 100 |
| Reactive penetrating sealers | 350 |
| Recycled coatings | 100 |
| Roof coatings | 50 |
| Rust preventative coatings | 250 |
| Shelacs | 730 |
| Clear | 550 |
| Opaque | 100 |
| Specialty primers, sealers and undercoaters | 250 |
| Stains | 450 |
| Stone consolidants | 340 |
| Swimming pool coatings | 100 |
| Traffic marking coatings | 420 |
| Tab and tie refinish coatings | 250 |
| Waterproofing membranes | 275 |
| Wood coatings | 350 |
| Wood preservatives | 340 |
| Zinc-rich primers | 340 |

SEALANT VOC LIMIT

Less Water and Less Exempt Compounds in Grams per Liter

SEALANTS

| | |
|--------------------------|-----|
| Architectural | 250 |
| Marine deck | 760 |
| Nonmembrane roof | 300 |
| Roadway | 250 |
| Single-ply roof membrane | 450 |
| Other | 420 |

SEALANT PRIMERS

| | |
|-------------------------|-----|
| Architectural | 250 |
| Nonporous | 775 |
| Porous | 500 |
| Modified bituminous 500 | 760 |
| Marine deck | 750 |
| Other | 750 |

Note: For additional information regarding methods to measure the VOC contents specified in these tables, see South Coast Air Quality Management District Rule 1168.

ADHESIVE VOC LIMIT^{1,2}

Less Water and Less Exempt Compounds in Grams per Liter

ARCHITECTURAL APPLICATIONS

| | |
|---|-----|
| Indoor carpet adhesives | 50 |
| Carpet pad adhesives | 50 |
| Outdoor carpet adhesives | 150 |
| Wood flooring adhesives | 100 |
| Rubber floor adhesives | 50 |
| Subfloor adhesives | 50 |
| Metallic tile adhesives | 65 |
| Ceramic tile adhesives | 50 |
| VOC and asphalt tile adhesives | 50 |
| Driveway and panel adhesives | 50 |
| Cove base adhesives | 70 |
| Multipurpose construction adhesives | 100 |
| Structural glazing adhesives | 250 |
| Single-ply roof membrane adhesives | 50 |
| Other adhesives not specifically listed | 50 |

SPECIALTY APPLICATIONS

| | |
|----------------------------------|-----|
| PVC welding | 510 |
| CPVC welding | 490 |
| ABS welding | 325 |
| Plastic cement welding | 250 |
| Adhesive primer for plastic | 550 |
| Contact adhesive | 80 |
| Special purpose contact adhesive | 250 |
| Structural wood member adhesive | 140 |
| Top and trim adhesive | 250 |

SUBSTRATE SPECIFIC APPLICATIONS

| | |
|-------------------------------|----|
| Metal to metal | 30 |
| Plastic foams | 50 |
| Porous material (except wood) | 30 |
| Wood | 80 |
| Fiberglass | 80 |

¹ Values in this table are derived from those specified by the California Air Resources Board, Architectural Coatings Suggested Control Measure, February 1, 2008. More information is available from the Air Resources Board.

² Values in this table are derived from those specified by the California Air Resources Board, Architectural Coatings Suggested Control Measure, February 1, 2008. More information is available from the Air Resources Board.

³ If an adhesive is used to bond dissimilar substrates together, the adhesive with the highest VOC content shall be used.

⁴ For additional information regarding methods to measure the VOC content specified in this table, see South Coast Air Quality Management District Rule 1168, <http://www.arb.ca.gov/DRDB/SC/CURHTMLR1168.PDF>.

⁵ Thin medium density fiberboard has a maximum thickness of 7/16 inches (8 mm).

FORMALDEHYDE LIMITS¹

Maximum Formaldehyde Emissions in Parts per Million.

| PRODUCT | CURRENT LIMIT |
|---------|---------------|
|---------|---------------|

| | |
|---|------|
| Hardwood plywood veneer core | 0.05 |
| Hardwood plywood composite core | 0.05 |
| Particleboard | 0.09 |
| Medium density fiberboard ² | 0.11 |
| Thin medium density fiberboard ³ | 0.13 |

¹ Values in this table are derived from those specified by the California Air Resources Board, Air Toxics Control Measure for Composite Wood as tested in accordance with ASTM E 1383. For additional information, see California Code of Regulations, Title 17, Sections 93120 through 93120.12.

² Thin medium density fiberboard has a maximum thickness of 7/16 inches (8 mm).

³ If an adhesive is used to bond dissimilar substrates together, the adhesive with the highest VOC content shall be used.

⁴ For additional information regarding methods to measure the VOC content specified in this table, see South Coast Air Quality Management District Rule 1168, <http://www.arb.ca.gov/DRDB/SC/CURHTMLR1168.PDF>.

⁵ Thin medium density fiberboard has a maximum thickness of 7/16 inches (8 mm).

SECTION 4.303.1

FIXTURE FLOW RATES

| FIXTURE TYPE | MAXIMUM ALLOWABLE FLOW RATE |
|--------------|-----------------------------|
|--------------|-----------------------------|

| | |
|----------------------------------|---------------------------------|
| Showerheads | 2 gpm @ 80 psi |
| Lavatory faucets, residential | 1.5 gpm @ 60 psi ¹ |
| Lavatory Faucets, nonresidential | 0.4 gpm @ 60 psi ² |
| Kitchen faucets | 1.8 gpm @ 60 psi ³ |
| Gravity tank type water closets | 1.28 gallons/flush ⁴ |
| Flushometer tank water closets | 1.28 gallons/flush ⁴ |
| Flushometer valve water closets | 1.28 gallons/flush ⁴ |
| Urinals | 0.125 gallons/flush |

¹ Lavatory Faucets shall not have a flow rate less than 0.8 gpm at 20 psi.

² Kitchen faucets may temporarily increase flow above the maximum rate, but not above 2.2gpm @ 60psi and must default to a maximum flow rate of 1.8 gpm @ 60psi.

³ Where complying faucets are unavailable, aerators rated at .35 gpm or other means may be used to achieve reduction.

⁴ Includes single and dual flush water closets with an effective flush of 1.28 gallons or less.

Single Flush Toilets - The effective flush volume shall not exceed 1.28 gallons (4.8 liters). The effective flush volume is the average flush volume when tested in accordance with ASME A112.19.23.2.

Dual Flush Toilets - The effective flush volume shall not exceed 1.28 gallons (4.8 liters). The effective flush volume is defined as the composite, average flush volume of two reduced flushes and one full flush. Flush volumes will be tested in accordance with ASME A112.19.2 and ASME A112.19.14.

Revised 01-01-2014

Page 1 of 1

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A D G

ARCHIVE DESIGN GROUP

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LOS ANGELES, CA 90036

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Revised 01-01-2014

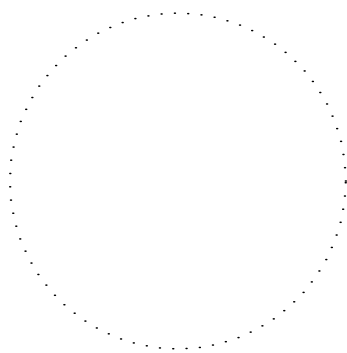
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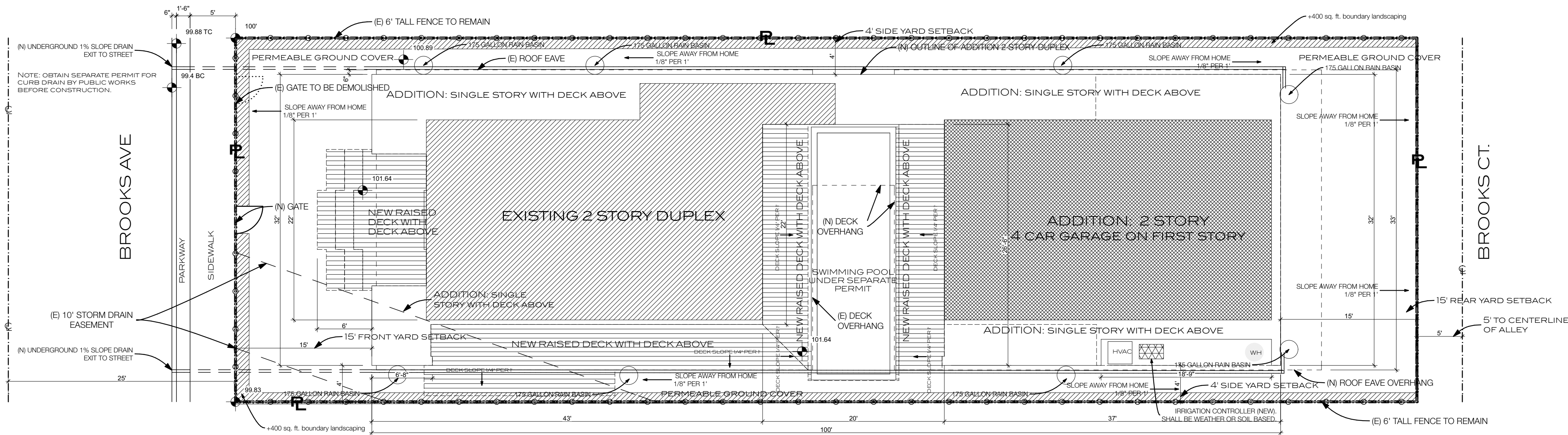
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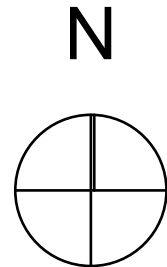
www



**BROOKS AVE
RESIDENCE**
632 BROOKS AVE
VENICE BEACH, CA
90291



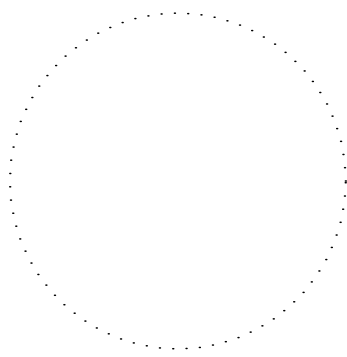
1 SITE PLAN
A-1.0 SCALE: 1/8" = 1'-0"



| MARK | DATE | DESCRIPTION |
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|------|------|-------------|

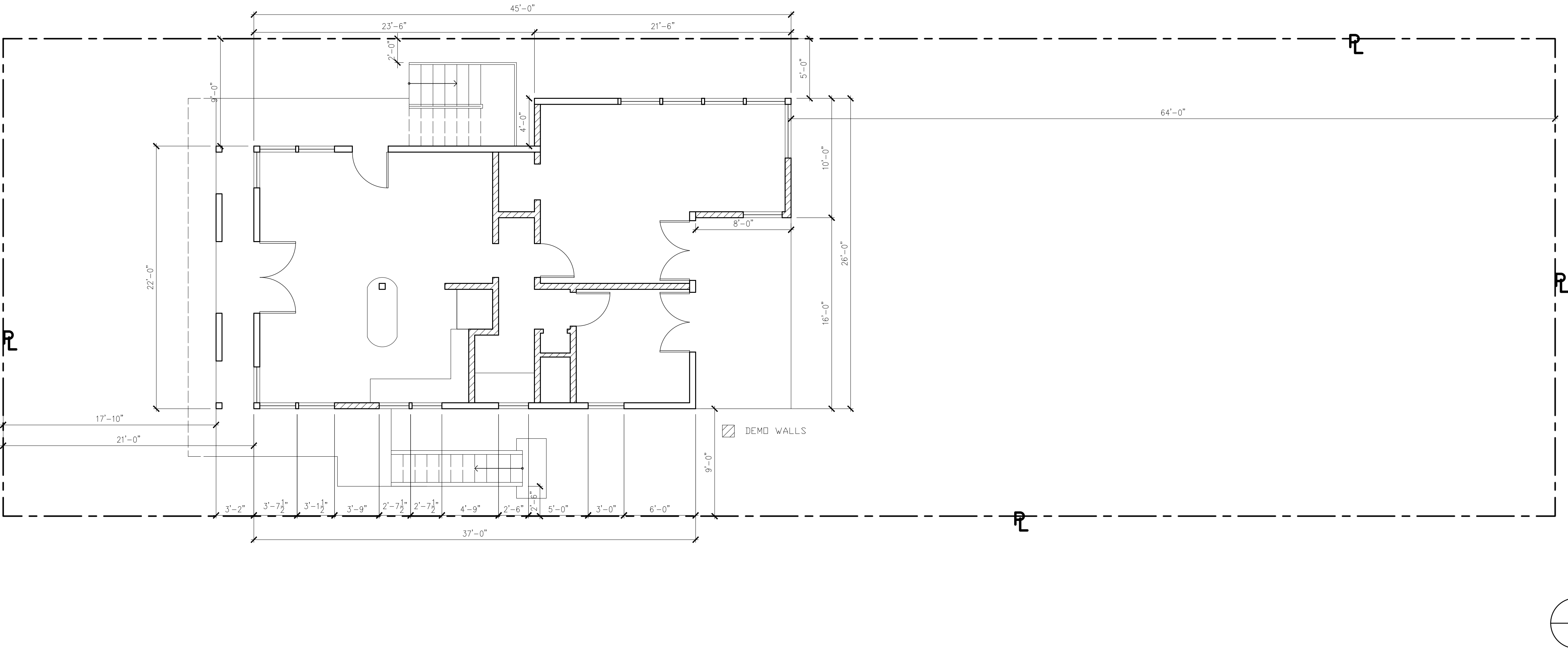
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DATE: **10/13/15**
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2015

SHEET TITLE
SITE PLAN



BROOKS AVE
RESIDENCE

632 BROOKS AVE
VENICE BEACH, CA
90291



1
A-2.0

EXISTING FIRST FLOOR PLAN WITH DEMO

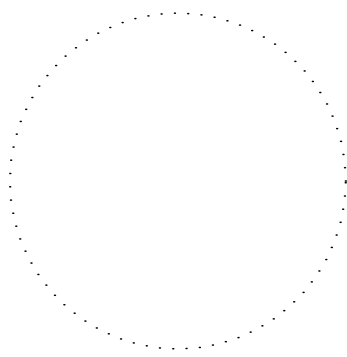
SCALE: 3/16" EQUALS 1'

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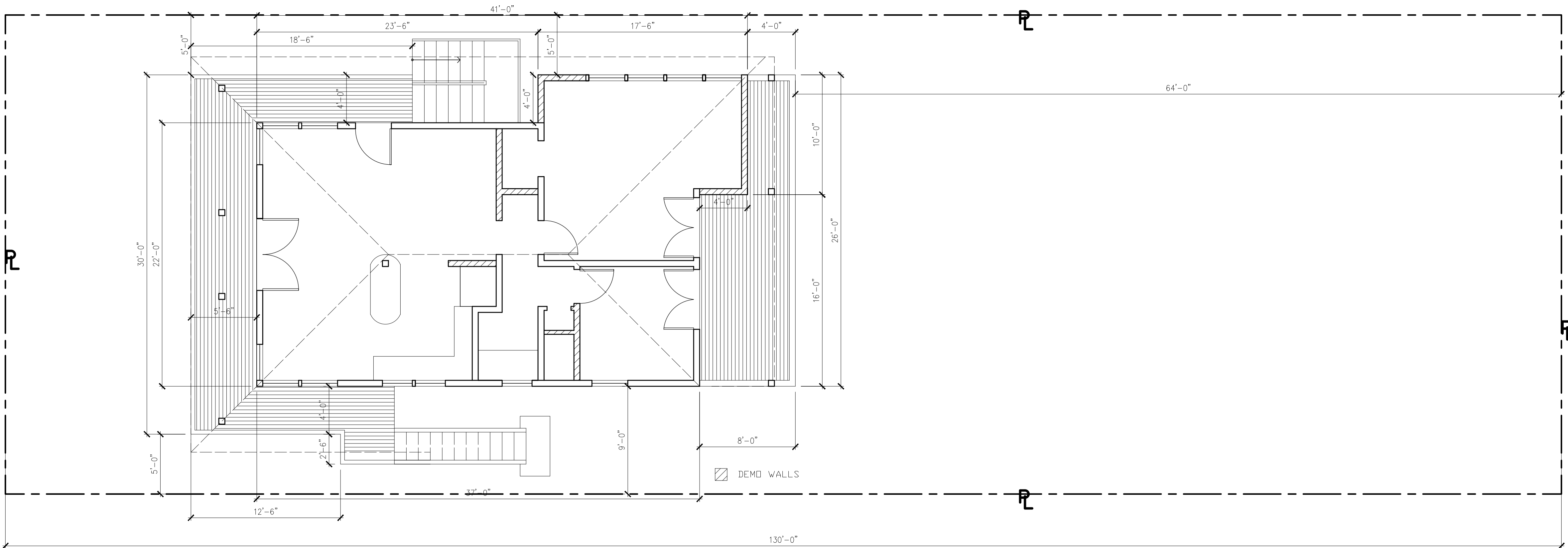
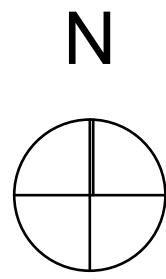
SHEET TITLE

EXISTING 1ST
FLOOR PLAN



BROOKS AVE
RESIDENCE

632 BROOKS AVE
VENICE BEACH, CA
90291



1
A-2.1

EXISTING 2ND FLOOR PLAN WITH DEMO

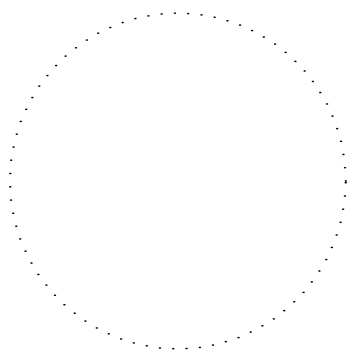
SCALE: 3/16" EQUALS 1'

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| MARK | DATE | DESCRIPTION |

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DATE: **10/13/15**
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SHEET TITLE

EXISTING 2ND
FLOOR PLAN



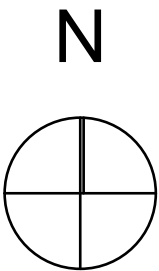
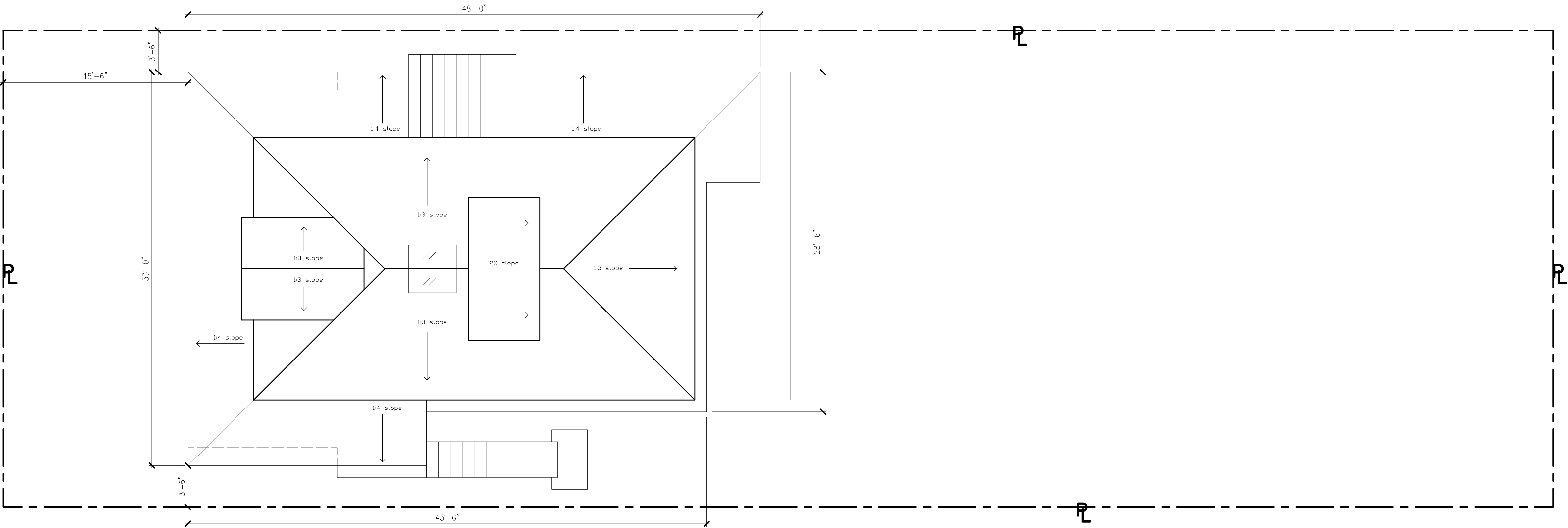
BROOKS AVE
RESIDENCE

632 BROOKS AVE
VENICE BEACH, CA
90291

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| MARK | DATE | DESCRIPTION |

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SHEET TITLE
EXISTING
ROOF PLAN



1
A-2.2
EXISTING ROOF PLAN
SCALE: 3/16" EQUALS 1'

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5225 WILSHIRE BLVD.SUITE 314
LOS ANGELES, CA 90036

632 BROOKS AVE
VENICE BEACH, CA
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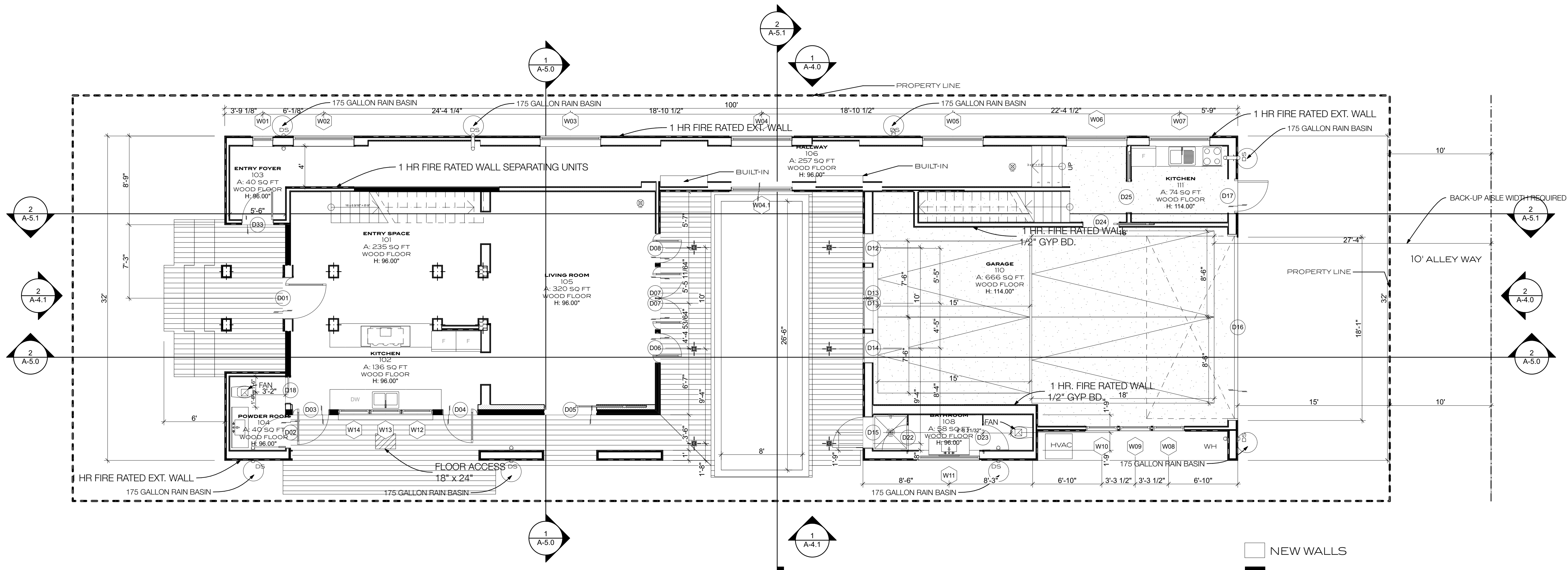
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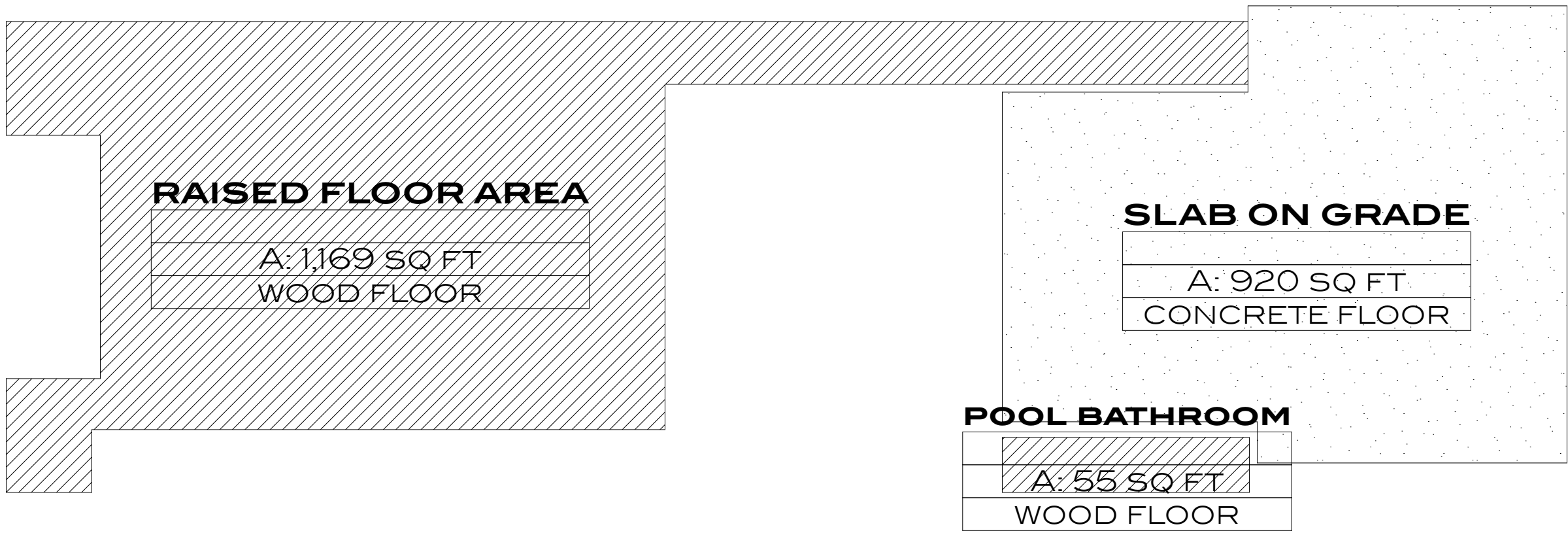
EXISTING
ELEVATIONS

SHEET 8 OF 32

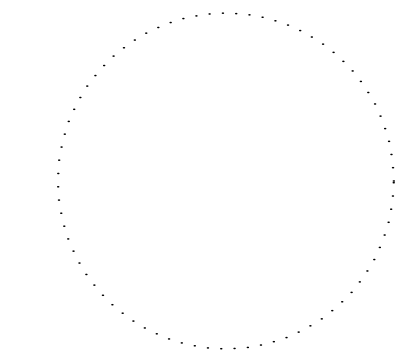




1 1st Floor
SCALE: 3/16" = 1'-0"



2 Floor Area Diagram
SCALE: 1/8" = 1'-0"



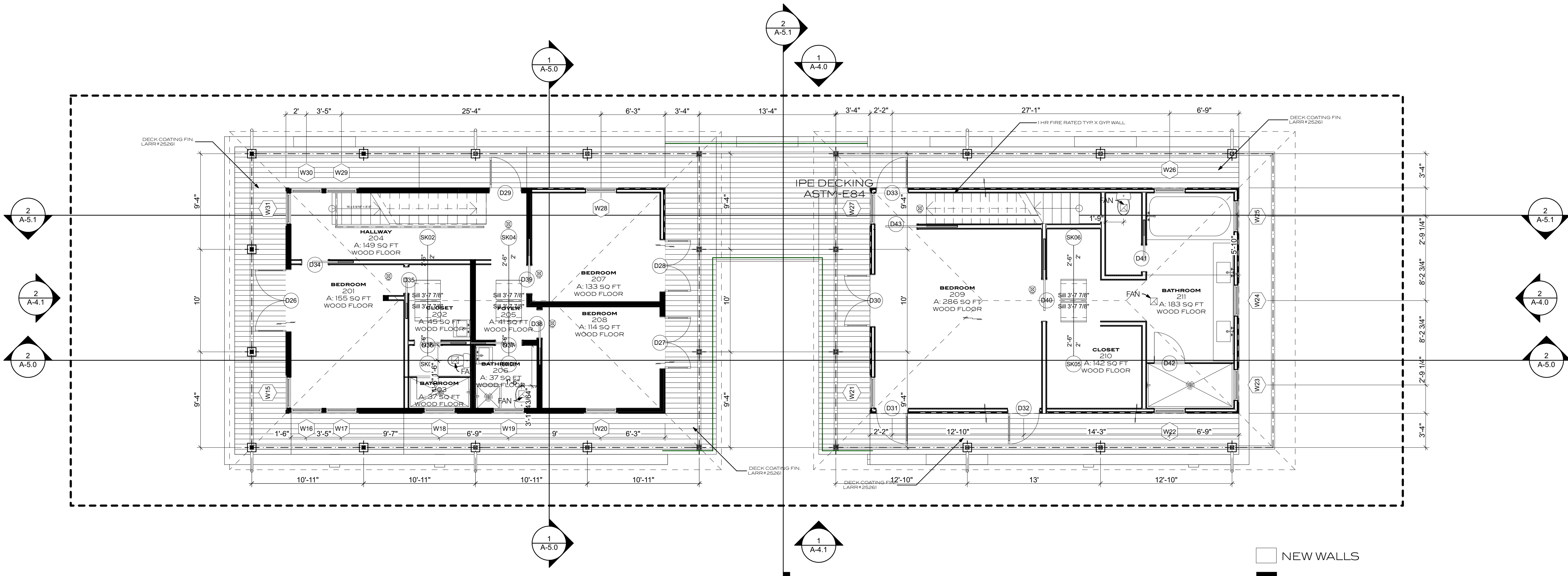
**BROOKS AVE
RESIDENCE**
632 BROOKS AVE
VENICE BEACH, CA
90291

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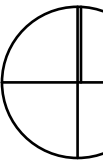
SHEET TITLE
**2ND FLOOR
PLAN**

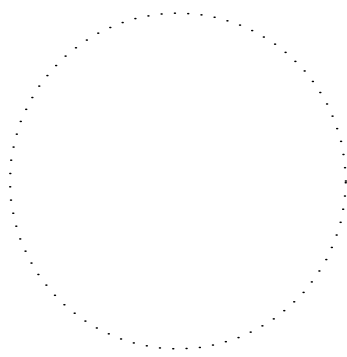
A-3.1



1
A-3.1 **2nd FLOOR**
SCALE: 3/16" = 1'-0"

N





BROOKS AVE
RESIDENCE

632 BROOKS AVE
VENICE BEACH, CA
90291

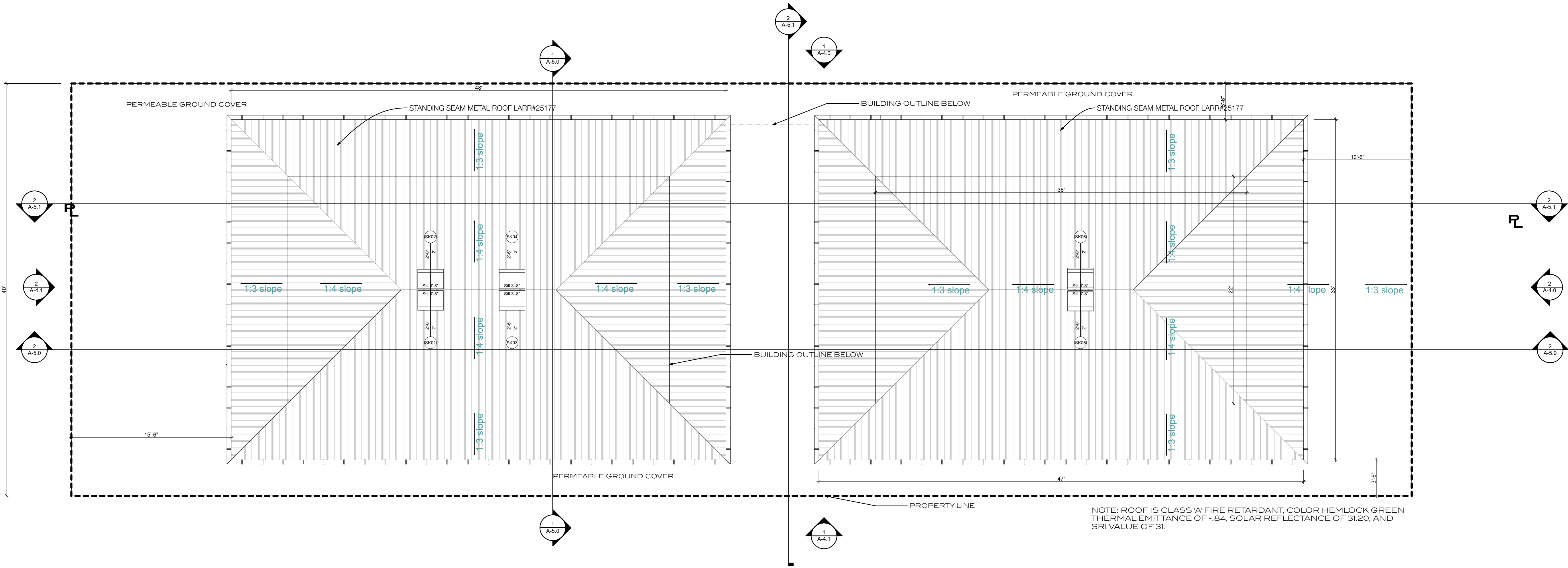
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SHEET TITLE

ROOF /
DRAINAGE
PLAN

A-3.2



NOTE: ROOF IS CLASS 'A' FIRE RETARDANT, COLOR HEMLOCK GREEN
THERMAL EMITTANCE OF .84, SOLAR REFLECTANCE OF 31.20, AND
SRI VALUE OF 31.

1 ROOF PLAN
A-3.2 SCALE: 3/16" = 1'-0"

California Coastal
Commission200 OCEANGATE, 10TH FLOOR
LONG BEACH, CA 90802-4418

VOICE (562) 590-5071 FAX (562) 590-5084

SOURCES AGENCY

AL COMMISSION

FICE

RECEIVED
South Coast Region

EDMUND G. BROWN JR., Governor

MAR - 4 2016

CALIFORNIA
COASTAL COMMISSION**APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT****Please Review Attached Appeal Information Sheet Prior To Completing This Form.****SECTION I. Appellant(s)**

Name: Robin Rudisill, Sue Kaplan, David Ewing, as individuals & not on behalf of the VNC or its committees

Mailing Address: 3003 Ocean Front Walk

City: Venice

Zip Code: 90291

Phone: 310-721-2343

SECTION II. Decision Being Appealed

1. Name of local/port government:

Los Angeles

2. Brief description of development being appealed:

Renovation and addition to existing 1,806 sq ft 4-bedroom, 2-bath duplex. Addition includes 2,120 sq ft of space, including 4-car garage and pool/spa. 50% of existing of existing structure to remain (50% of exterior walls)

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

632 Brooks Ave, APN: 423-901-2015, 6th Ave

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:

A-S-VEN-16-0034

DATE FILED:

3/4/2016

DISTRICT:

South Coast

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- ☒ Planning Director/Zoning Administrator
☐ City Council/Board of Supervisors
☐ Planning Commission
☐ Other

6. Date of local government's decision: October 1, 2015

7. Local government's file number (if any): DIR-2015-3600-CEX

SECTION III. Identification of Other Interested Persons

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

Zoran Pevel, 5225 Wilshire Blvd, Suite 314, L.A., CA

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

(1)

(2)

(3)

(4)

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

SECTION IV. Reasons Supporting This Appeal

PLEASE NOTE:

- 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.

State law requires that 50% or more of the structure be maintained in order to qualify as an existing structure for purposes of a Coastal Exemption. This project cannot be considered an addition to and/or a remodel of an existing single-family dwelling when it is clear that most, and definitely more than 50%, of the structure is to be demolished. In addition, the very large size of the addition and the fact that most of the entire structure is to be demolished (the Project Description actually states that less than 50% of the walls are to remain, which is not allowed under ANY definition of partial demolition), leaves little existing structure to add onto or improve, indicates that the development is much more than an "improvement" to a single-family dwelling. As the project is not an improvement to an existing single-family residence, it is therefore non-exempt "development" as defined in the Coastal Act, and thus a CDP should be required.

In addition, the structural integrity of the aged foundation and framing must be considered when considering whether such a project can be done while maintaining 50% or more of the existing structure. Such large projects are likely to require a full demolition of the existing structure, which is development that requires a CDP.

Thus, the CEX must be revoked and the Applicant requested to obtain a CDP.

In addition, the size and scope of the project necessitate a review of the project for consistency under the CDP process, because the proposed new single-family dwelling is inconsistent with the Community Character policies of the Venice Land Use Plan, the L.A. General Plan and relevant Community Plan for Venice and City Codes. Also, the nature of the proposed project and the City's action are not consistent with the policies of Chapter 3 of the Coastal Act. Because an issue exists with respect to the conformity of the CEX action by the City with the Chapter 3 policies of the Coastal Act, the City's exemption action is invalid and must be voided/revoked.

The City's Coastal Exemption process is being used to avoid the CDP process, during which the proposed development would be reviewed for consistency with the character of the surrounding area. Community Character is a significant Coastal Resource, particularly in Venice, which has been designated by the Coastal Commission as a "Special Coastal Community." As also indicated in numerous Coastal Commission reports and decisions, Venice is a Coastal Resource to be protected, and as a primarily residential community, residential development is a significant factor in determining Venice's Community Character. Although this Coastal Exemption relates only to one project, the erosion of Community Character is a cumulative issue, and the City's cumulative exemption of numerous large-scale addition/remodel projects (and the usual associated demolition exceeding 50% of the existing structure) has a significant adverse impact on Venice's character, which is also evidenced by

the significant Community concern expressed in numerous other appeals of Coastal Exemptions.

In addition, the Venice Coastal Zone does not have a certified Local Coastal Program, and issuing exemptions for proposed projects like this one, which substantially exceed the mass and scale of the surrounding area and are also significantly larger than the existing structure, set a very damaging precedent. The abuse of the City's Coastal Exemption process in order to avoid obtaining a CDP for new development has been a recurring problem. The City has inadequate controls over the Coastal Exemption process, including a lack of adequate enforcement, resulting in developers frequently ignoring or violating regulations, including demolition of the entire structure even though the project description indicates otherwise. There is generally no penalty applied by the City when this is discovered, other than a requirement to stop work and obtain a CDP, and thus there is little to discourage Applicants from this practice. Very importantly, exempting projects from the CDP process have potential significant negative cumulative impacts to the entire California Coast, as these projects are not being properly reviewed for Community Character and conformance to Chapter 3 of the Coastal Act.

The Coastal Commission-certified Venice Land Use Plan, used as guidance for determining conformity with Chapter 3, indicates in Policy I. E. 2. that "... All new development and renovations should respect the scale, massing and landscape of existing residential neighborhoods." However, the City does not perform such a review for Coastal Exemptions, including for this project.

Relevant law includes Coastal Act Section 30610 and CCR Section 13250 and 13252 (see attached).

Adjacent neighbors, neighbors in the surrounding area, and all Venice residents are harmed by the project, as well as the cumulative effect of this project and other such projects. Not only are there adverse effects on adjacent and surrounding properties (without an associated public process including Notice, a Public Hearing, transparency, and an Appeal right), but there is a significant adverse impact on the Community Character of Venice, which is a protected Coastal Resource, and which has the result of significantly reducing the long-term value of the Venice Coastal Zone Community and the current and future Quality of Life for all residents of Venice.

In addition, processing of this type of project using a Coastal Exemption may result in the avoidance of a Mello Act Compliance review and Determination, and thus there is a potential for loss of Affordable Units in the Venice Coastal Zone, which is a significant and very material loss of low-income housing.

This project constitutes the development of a new single-family residence, and therefore the Coastal Exemption and the Building Permit must be revoked (or stopped if still in the clearance process) immediately, and a CDP must be obtained in order to ensure that the project conforms to the policies of the certified LUP and Chapter 3 of the Coastal Act, and local land use regulations.

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: March 4, 2016

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.

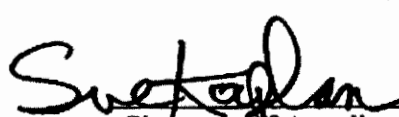
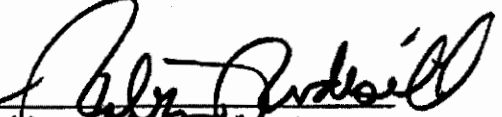
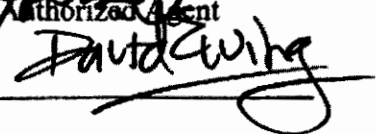
Signature of Appellant(s)

Date: _____

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: March 4, 2016 

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: _____

Application

COASTAL EXEMPTION (CEX)

RECEIVED
South Coast Region

FEB 04 2018

CALIFORNIA
COASTAL COMMISSIONCASE NO.: DIR 2015-3600-CEX

TO: California Coastal Commission
South Coastal District
200 Oceangate, 10th Floor
Long Beach, CA 90802-4302
(562) 590-6071

FROM: Los Angeles Department of City Planning
Development Services Center (DSC)
201 North Figueroa Street
Los Angeles, CA 90012

SUBJECT: COASTAL EXEMPTION—SINGLE JURISDICTION AREA ONLY

Under no circumstances shall a Coastal Exemption be issued for the following scopes of work:

- Remodels which involve the removal of 50% or more of existing exterior walls
- Addition, demolition, removal or conversion of any whole residential units (unless required by LADBS)
- Projects which involve significant grading or boring in a Special Grading or Landslide area
- Any change of use (to a more or less intensive use)

OWNER/APPLICANT TO COMPLETE THE FOLLOWING (type, print, or fill out on-line)

PROJECT ADDRESS: 632 BROOKS AVE.
LEGAL DESCRIPTION: LOT 14 BLOCK K TRACT QUINN PARK VILLA
ZONE: RD 1.5 COMMUNITY PLAN: VENICE
PROPOSED SCOPE OF WORK: RENOVATION & ADDITION (EX) 1,806 sq. ft.
4 bed/2 bath duplex. Addition includes 2,125 sq. ft. of space
which includes a 4 car garage + pool/spa. 50% of EX
structures to remain (50% of exterior walls).
RELATED PLAN CHECK NUMBER(S): B15WLD2665

Note: If there is related work to be pulled under a separate permit, please include in the above project description. The reason for this is so Planning Staff can evaluate the project as a whole and to avoid having to apply for another CEX for any subsequent permits related to the original scope of work.

Applicant Name: ZORAN PEVEL
Mailing Address: 5225 WILSHIRE BLVD. SUITE # 314
Phone Number: 310 666-6093 E-mail Address: ZORAN@ARCHIVEDESIGNGROUP.COM
Signature: [Signature]

THIS SECTION FOR OFFICE USE ONLY

This application has been reviewed by the staff of the Los Angeles Department of City Planning in accordance with the provisions of Section 3010 of the California Coastal Act. A determination has been made that a Coastal Development Permit is not required for the preceding described project based on the fact that it does not: (1) involve a risk of adverse environmental effect, (2) adversely affect public access, or (3) involve a change in use contrary to any policy of this division pursuant to Title 14 of the California Administrative Code, and qualifies for an exemption under one or more of the categories checked below.

- ☐ **Improvements to Existing Single-Family Residences.** This includes interior and exterior improvements, additions, and uses which are accessory to a single-family residence (e.g. garages, pools, fences, storage). This does not include the increase or decrease in the number of residential dwelling units (including guest houses), or retaining walls or pools that may have a potential significant impact on coastal resources (i.e. viewable from the public right-of-way, involves a significant amount of grading or boring in Hillside, Landslide or Special Grading areas), which may be reviewed on a case-by-case basis.
- ☒ **Improvements to Any Existing Structure Other Than A Single-Family Residence.** For duplex or multifamily residential uses, this includes interior and exterior improvements, additions and uses which are accessory to the residential use (e.g. garages, pools, fences, storage sheds), but does not include the increase or decrease in the number of residential dwelling units, or retaining walls or pools that may have a potential significant impact on coastal resources (i.e. viewable from the public right-of-way, involves a significant amount of grading or boring in Hillside, Landslide or Special Grading areas), which may be reviewed on a case-by-case basis. For non-residential uses, this includes interior and exterior improvements and building signage (excluding pole, pylon and off-site signs), but does not include any addition of square footage or change of use (to a more or less intense use).
- ☐ **Repair or Maintenance.** This includes replacement, repair and/or maintenance activities (i.e. re-roofing, replacement of equipment, etc.) which do not result in any changes, enlargement or expansion.
- ☐ **Demolitions required by LADBS.** This includes projects which have been issued a Nuisance and Abatement or Order to Comply by the Department of Building & Safety requiring demolition due to an unsafe or substandard condition. Please attach the Building & Safety Notice.

This exemption in no way excuses the applicant from complying with all applicable policies, ordinances, codes and regulations of the City of Los Angeles. This exemption shall not apply if the project is not consistent with local land use regulations. If it is found that the project description is not in conformance with the actual project to be constructed or is not in conformance with Section 30610 of the California Coastal Act, this exemption is null and void.

Michael LoGrande
Director of Planning

Issued By:

Signature: *Michael LoGrande*

Print Name and Title: *Vincent J. Latoriano City Planning Associate*

Date:

10/11/2015

Invoice No.:

26111

Receipt Number:

0102 496006

Attached:

Copy of Invoice with Receipt No.

Copy of related Building & Safety Clearance Summary Worksheet(s)



CITY OF LOS ANGELES
Department of City Planning – Plan Implementation Division
 City Hall • 200 N. Spring Street, Room 821 • Los Angeles, CA 90012



DIRECTOR OF PLANNING SIGN-OFF
 Venice Coastal Zone Specific Plan (Ordinance 175,693)

| | | |
|---|--|-----------------------|
| Case Number | DIR 2015-1668-VSO | Date: 05/01-15 |
| Project Address | 632 E Brooks Ave [Ocean Park Villa Tract; Block K; Lot 14] | |
| Zoning: RD1.5-1 | Subarea: Oakwood-Milwood-Southeast Venice | |
| Project Description | Remodel/add'n to an (E) 2-story duplex | |
| Related Cases | DIR2005-2932-VSO: 1 st & 2 nd floor add'n to (E) 2-story duplex; add front & rear patio; (N) deck & dormer on 2 nd story (PCIS 05014-30T-03217; 05/06-05) | |
| Existing Use: 2-story-duplex w/ uncovered pkg spaces | Proposed Use: 2-story duplex w/ 5 pkg sp (2 in attached garage & 3 uncovered) | |
| Applicant Name | Oliver Damavandi (o) / Zoran Pevac @ 310-866-6083 & Matt Goff @ 310-502-7614 (a) | |
| Applicant Address | 127 Broadway Ave, Ste. 208, Santa Monica, CA 90401 | |

The project qualifies for an Administrative Clearance, a Specific Plan Project Permit Compliance is not required (pursuant to Section 8 of the Specific Plan) for at least one of the reasons below:

In the DUAL JURISDICTION

- ☐ Improvement to an existing single- or multi-family structure that is *not* on a Walk Street

In the SINGLE JURISDICTION

- ☒ Improvement to an existing single- or multi-family structure that is *not* on a Walk Street
- ☐ New construction of one single-family dwelling unit, and not more than two condominium units, *not* on a Walk Street
- ☐ New construction of four or fewer rental units, *not* on a Walk Street
- ☐ Demolition of four or fewer units

ANYWHERE in the Coastal Zone

- ☐ Any improvement to an existing commercial or industrial structure that increases the total occupant load, required parking or customer area by less than 10 percent (<10%)

This application has been reviewed by the staff of the Metro Plan Implementation Division, and the proposed project complies with the provisions of the Venice Coastal Zone Specific Plan including all development requirements contained in Section 9, 10.G, and 13, as evidenced below:

| Oakwood-Milwood-Southeast Venice Subarea Development Regulations | | | |
|--|---|---|-------------------------------------|
| Section | Regulation | Proposed Project | complies |
| 9.C. Roof Access Structure | 10 ft. max. above Flat Roof (25 ft); Area ≤ 100 sq. ft. | NA | <input type="checkbox"/> |
| 10.G.2. Density | RD1.5: max 2 du C zones: Max. is R3 density | (E) 2-story duplex. No new unit. | <input checked="" type="checkbox"/> |
| 10.G.3. Height | Flat Roof – 25 feet Varied Roofline – 30 feet | To top of varied roofline is 24'5" | <input checked="" type="checkbox"/> |
| 10.G.4. Access | Alley | from alley, Brooks Court | <input checked="" type="checkbox"/> |
| 13. Parking | SF - 2-3 spaces per unit pending width MF - 2 spaces plus 1 guest pending width <i>Where 50% or more of (E) exterior walls are removed/replaced, provide a min total of 5 pkg sp accessed from alley. Proj affects about 43% of (E) exterior walls.</i> | 5 pkg spaces (2 in attached garage & 3 uncovered). Pkg layout is per Bldg&Safety. | <input checked="" type="checkbox"/> |

The proposed project must comply with all other regulations of its subject zone and all other provisions of the Los Angeles Municipal Code (LAMC) and must receive approval from the Los Angeles Department of Building and Safety (LADBS). This Director of Planning Sign-Off is based on the information provided by the applicant. If, at a later date, this information is found to be incorrect or incomplete, this sign-off will become invalid, and any development occurring at that time must cease until appropriate entitlements are obtained.

Soborro Smith-Yumul
 Venice Unit, (213) 978-1208

Name: Oakwood Planning District**Description:**

The Oakwood Planning District is a residential neighborhood located in the northwestern portion of Venice. The district contains approximately 1,800 parcels. It is bounded by Dewey Street to the northwest, Lincoln Boulevard to the northeast, California Avenue to the southeast, Electric Avenue to the southwest, and Hampton Drive to the west.

The district occupies flat terrain less than a mile from the Pacific Ocean. Streets throughout the district exhibit a rectilinear pattern and are arranged in an orthogonal grid. Lots in the district are modest in size, with most parcels less than 0.15 acres. Development in the district is primarily residential, with some institutional properties, primarily churches, scattered throughout. Additionally, there are some commercial manufacturing uses located in the northwestern portion of the district, as well as neighborhood commercial developments along Rose Avenue and Hampton Drive. Original buildings were constructed primarily from 1905 through the 1920s, with a secondary wave of development during the 1940s and 1950s. Today, these early buildings share the block with more recent construction. District features include uniform setbacks, concrete curbs and sidewalks, and landscaped parkways.

Significance:

The Oakwood Planning District is significant as a rare example of an early-20th century African-American enclave in Venice. While the area does not retain sufficient integrity or cohesion to qualify as a historic district, it may warrant special consideration for local planning purposes.

In 1891, tobacco magnate and real estate developer Abbot Kinney and his business partner, Francis G. Ryan, purchased a 1.5 mile-long strip of beachfront land located to the south of Santa Monica. The 275-acre parcel, which extended from Strand Street south to Mildred Avenue, had originally comprised a portion of the Rancho La Ballona and was initially settled by the Machado and Talamantes families in the early 1800s. Kinney and Ryan turned their attention to the northern portion of the tract, where they developed the resort community of Ocean Park. In 1898, Francis Ryan died suddenly at the age of 47. Kinney attempted to carry on and eventually acquired three new business partners in 1902: Alexander Fraser, Henry Gage, and George Merritt Jones.

Over time Kinney has become known for his development of the Venice of America tract, which occurred in 1904 following his professional split from the three men and the subsequent dissolution of their business operations. However, in the intervening years Kinney, Fraser, Gage, and Jones invested in expanding and improving the community of Ocean Park under the auspices of the Ocean Park Development Company. Their success, as well as Kinney's later achievements in Venice, spurred development by other investors in the surrounding area, and much of the land comprising the district represents early efforts by individual developers to capitalize on the success of Ocean Park and Venice. The first subdivisions for residential development occurred within the district around 1903; many subsequent tracts were recorded after Venice was officially opened in 1905, and development activity continued through the mid-1920s.

While the district exemplifies trends in residential development during the early 1900s, it is perhaps more notable as an important example of African-American life in Southern California during the 20th century. There were three phases of African-American population expansion in Venice; the first two phases were a direct result of migration from the South as blacks sought improved living conditions, greater financial opportunities, and increased freedom from racially hostile communities. The first of these phases took place in the early 1900s. The population of African-Americans in Venice tripled

between 1910 and 1920 as blacks arrived to work as manual laborers, service workers, and servants to wealthy white residents. Some of the earliest black residents of Venice settled in the area because they were hired as employees of Abbot Kinney; among these were cousins Arthur Reese and Irving Tabor.

Reese arrived with his family from Louisiana around 1905, intending to establish a janitorial service, and soon invited his cousin Irving Tabor and family to join them in Oakwood. Reese, an artist and sculptor, began making suggestions to Kinney and eventually was hired as the town decorator. He is best known for decorating parade floats simulating Mardi Gras, which became emblematic of Reese's sterling career. Tabor was eventually hired as Abbot Kinney's chauffeur, and the two men forged a special bond. When Abbot Kinney died, he willed his house to Tabor. However, due to racist sentiments elsewhere in Venice, Tabor was compelled to move the house to its present-day location in Oakwood. Both the Reese and Tabor residences remain extant in Oakwood today; the Irving Tabor Residence is designated as a Los Angeles Historic-Cultural Monument.

At the time, housing was sporadically scattered throughout Oakwood, and as much of the land remained undeveloped, it became an early site for black homeownership. It is unclear whether or not racially restrictive housing covenants – already enacted in nearby communities like Santa Monica – were enforced in Ocean Park and Venice. However, de facto segregation in hiring practices and real estate sales restricted the mobility of black residents and led to the development of Oakwood as a predominantly African-American neighborhood. As one black resident later recalled, when asked why her family had chosen to settle in Oakwood, "This was the only place that they would sell to you. We knew."

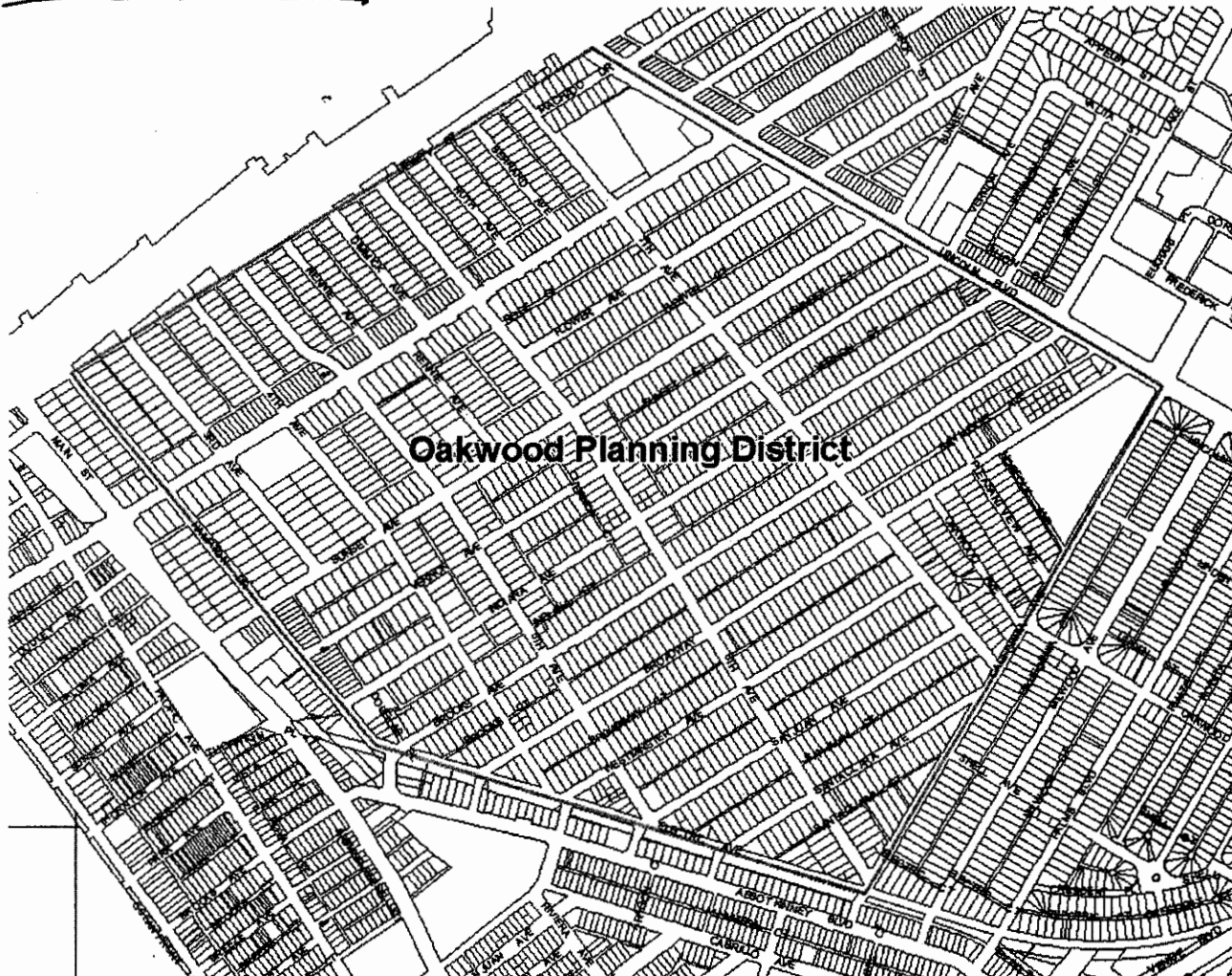
Early on, Oakwood was also home to a number of neighborhood churches: "By 1912, although there were only thirty-some black residents, there were already two African American churches in Oakwood. Fifty years later, the congregation of the First Baptist Church had grown to include over six hundred members." Several of these early congregations are still present in Oakwood today, serving as important gathering places for the African-American community, including First Baptist Church, Bethel Tabernacle Church of God in Christ, Friendship Baptist Church, and The Nazarene Church (now New Bethel Baptist Church).

The second phase of migration from the Southern states occurred during World War II, when the need for defense workers at nearby manufacturing facilities, such as Hughes Aircraft in Culver City and McDonnell Douglas in Santa Monica. The population of blacks in Oakwood tripled again between 1940 and 1950. The third and final phase of migration came during the postwar population boom and subsequent construction of the Santa Monica Freeway. Black and Latino residents who had been evicted from their homes in Santa Monica under eminent domain relocated to Venice. It was not until 1970 that the black population in Oakwood began to decline. By that time, however, many descendants of the neighborhood's earliest African-American families had settled in Oakwood, creating a tradition of third-, fourth-, and fifth-generation residents. Families frequently constructed additional houses on the same parcel of land, which provided an opportunity for children and grandchildren to become homeowners in Venice.

As the economic environment began to shift during the highly politicized 1960s and 1970s, many African-Americans found it difficult to secure housing and employment; community organizers collaborated with the U.S. Department of Housing and Urban Development (HUD) to construct fourteen low-income housing projects in Oakwood during the early 1970s. These buildings were scattered throughout the entire district and provided assistance to many African-American residents, allowing them to maintain a strong association with the neighborhood.

Despite its significance, the Oakwood Planning District does not possess sufficient integrity to qualify as a historic district. Many of the district's original buildings have undergone some degree of alteration or have been replaced with newer construction, which has compromised the cohesion and integrity of the district as a whole. However, the district continues to convey the feeling of an early-20th century residential neighborhood and retains a strong association as an African-

American enclave, with many third-, fourth-, and fifth-generation residents. For these reasons, this area may warrant special consideration for local planning purposes.



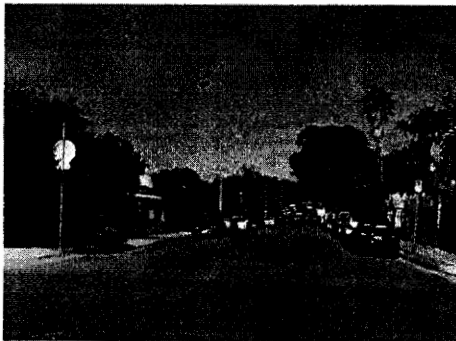
Context 1:

| | |
|--------------------|--|
| Context: | Residential Development and Suburbanization, 1850-1980 |
| Sub context: | No Sub-context |
| Theme: | <u>Ethnic Enclaves, 1880-1980</u> |
| Sub theme: | No SubTheme |
| Property type: | Residential Neighborhood |
| Property sub type: | No Sub-Type |
| Criteria: | A/1/1 |
| Status code: | 6LQ |
| Reason: | The Oakwood Planning District is significant as a rare example of an early-20th century African-American enclave in Venice. While the area does not retain sufficient integrity or cohesion to qualify as a historic district, it may warrant special consideration for local planning purposes. |

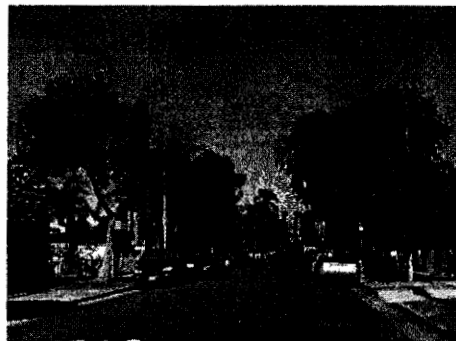
Context: Residential Development & Suburbanization, 1850-1980

Theme: Ethnic Enclaves, 1880-1980

This Context/Theme was used to evaluate the Oakwood Planning District as a rare example of an early-20th century African-American enclave in Venice. Oakwood first established itself as an African-American neighborhood in the early 1900s, as blacks migrating from the South settled in Venice to work as manual laborers, service workers, and servants to wealthy white residents. During World War II, the black population of Oakwood increased dramatically due to the need for defense workers at nearby manufacturing facilities, such as Hughes Aircraft in Culver City and McDonnell Douglas in Santa Monica. By the 1970s, many descendants of the neighborhood's earliest African-American families had settled in Oakwood, creating a tradition of third-, fourth-, and fifth-generation residents, and thereby providing a unique opportunity for homeownership in Venice. Predominantly single-family residential in its development, Oakwood is also home to several early religious congregations that continue to serve as important gathering places for the African-American community, including First Baptist Church, Bethel Tabernacle Church of God in Christ, Friendship Baptist Church, and The Nazarene Church (now New Bethel Baptist Church). While the area does not retain sufficient integrity or cohesion to qualify as a historic district, it may warrant special consideration for local planning purposes.



Name: Oakwood Planning District
Description: Street view



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Dear Neighbors -

I am currently working on a project at 632 Brooks Ave., and obtained building permits back in October of 2015 for an addition and remodel. The project retains the front building, in height and mass, while adding a single story corridor to the back addition which is roughly the same size as the building in the front. The project also retains the same multi-family zoning.

Unfortunately, some members of the Venice Neighborhood Council have filed appeals for every project in the area, halting construction entirely, and forcing every home owner and builder who is under construction to meet with the Coastal Commission to fight the appeal. As a local resident of Venice, I am looking for support from the neighborhood in order to continue with construction in a timely manner, and not let my construction site sit for as long as a year — which is dangerous and unsightly for the community.

Below is a rendering of my proposed project. I humbly ask that you sign this letter along with your printed name and address (which will be kept confidential) if you would like to see progress with this particular project and email it back to me at odamavandi@gmail.com

Your support means a great deal to me and I thank you for your time and effort.

With much appreciation,

Oliver Damavandi

Daniel Weisinger / dwe
809 Brooks Ave



Exhibit 5

Page 1 of 8



California Coastal
Commission

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With much appreciation,

Oliver Damavandi

*Attractive addition to the
neighborhood!
Mr. Daccati
714 6th Ave*



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With much appreciation,

Oliver Damavandi

Christian Stiller
630 Brooks Ave
Venice, CA 90291



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Oliver Damavandi

DocuSigned by:
David Leepson
AC70F8EA05C245D...

David Leepson: 674 Brooks Avenue

DocuSigned by:
Marieh D. Leepson
449D759749D847C...

Marieh D. Leepson: 674 Brooks Avenue



From: Oliver Damavandi <odamavandi@gmail.com>
Subject: Fwd: 632 Brooks Avenue
Date: March 20, 2016 at 6:20 PM
To: Zoran Pevec <zoran@archivedesigngroup.com>

Sent from my iPhone

Begin forwarded message:

From: "Piccus, Todd" <Todd.Piccus@Mattel.com>
Date: March 20, 2016 at 5:53:33 PM PDT
To: "odamavandi@gmail.com" <odamavandi@gmail.com>
Subject: 632 Brooks Avenue

Hi. I received your flier. And, having applied for and secured for a variance on a property that I used on own on Milwood, and having built a new home on Palms, I'm sending you my best wishes. VNC and Venice neighbors can be excruciating, stressful, irrational, clueless, and maddening. The process you're undertaking is not for the faint of heart.

I wish you the best.

Todd Piccus
VP, Legal & Business Affairs
office: 310.252.2938

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With much appreciation,

Oliver Damavandi

Rehm, Zach@Coastal

From: Louis Leal <louis@pardeeproperties.com>
Sent: Wednesday, March 16, 2016 12:14 PM
To: Rehm, Zach@Coastal
Subject: Support project at 632 Brooks..

Zach,

Pleasure to meet you via email. I'm writing you not only as someone from the area who works in the real estate for over 15 years but also as a long time Venice resident of approximately 20 years. This email is to show support for the project at 632 Brooks Avenue. There have been way to many appeals of projects around town that are frivolous and have no basis for appeal aside the fact the some people just do not want to see change.

Venice was founded by a developer over 110 years ago and he shaped the area we call home. At that time only some 15% of all the lots were sold and developed under his tutelage. Many of these appeals state that "this is not in the vein of what Abbot Kinney built" and that "everyone is tearing down these historical homes". Well that is not true, many of the homes that are being appealed were build in the late 40's and early 50's after the great war. They are in no way an indication of the "historic look of Venice" under Abbot Kinney nor fit the living style of modern home owners. We don't drive Model T's any longer, that industry has moved into the 21st century. Homes too need to follow suit. That is whats going on in Venice and in most metropolitan areas around town and around the country. People demand better laid out homes with more space and modern features that these old WWII homes just do not have.

Lastly, there are some 4200 single family homes in the 3.5 square miles of Venice. 5% of homes normally trade hands each year an of that number just over 1% are newly constructed homes. That means that each year Venice gets 1% of new homes replacing old homes, it would take 100 years to change the face of Venice and that really hasn't happened in the past 110 years so I am sure it won't in the next 100 years.

Please consider your actions with this appeal and do not set a negative precedent against building in the area. Especially for projects that are fully permitted and are being built by right. I thank you for your time with this matter and if you ever want to chat my office is always open.

Have a great day.

Louis

LOUIS LEAL

Director of Marketing / Business Manager

Opening doors. Lifting hearts. Changing lives.

310.392.2402 office
310.739.2228 mobile
louis@pardeeproperties.com
pardeeproperties.com
BRE #01815152

Rehm, Zach@Coastal

From: Elizabeth Padilla <elizabethcpadilla@gmail.com>
Sent: Wednesday, March 16, 2016 10:54 PM
To: Rehm, Zach@Coastal
Subject: Zach Rehm - 632 Brooks Ave, Venice

Hello Zach,

Hope you are well. I'm am emailing in regards to the 632 Brooks Avenue project that has been appealed. As a Venice resident I understand the Neighborhood Council's concern about the level of development happening in area. Many projects are ridiculously oversized, and are clearly only focused on profit. Most new construction designs completely contradict the character and charm of neighborhood. Therefore I can see why the Venice Neighborhood Council has focused so strongly in appealing all development projects. However, I believe the 632 Brooks Avenue project should be excluded from this appeal. I've seen the plans first hand. The architect and owner have spent much time and due diligence to create a design that wouldn't compromise the character of Venice. The architecture would be a great addition to the neighborhood, and hope you will reconsider.

All the best,

Elizabeth Padilla
29 25th Ave, Venice 90291
(925)437-9395

Rehm, Zach@Coastal

From: Tara Lankford <taralank@gmail.com>
Sent: Tuesday, March 22, 2016 4:18 PM
To: Rehm, Zach@Coastal
Subject: 632 Brooks Ave

Hello Zach,

My name is Tara Lankford and I have been a resident of Venice since January 2011; my address is 317 7th Avenue in Venice, California 90291. Living in Venice for the past 5 years, I've seen it evolve and transform for the best. The proposed project at 632 Brooks Avenue will add tremendous value to the community as a whole; but selfishly, I feel that it is a gorgeous project, one that I look forward to watching take place as I walk my dog through the streets near my residence.

I strongly urge the California Coastal Commission to approve the project and let the residents of Venice decide how we want our neighborhood to evolve.

Thank you!

Respectfully,
Tara Lankford
310.663.1566

Sent from my iPhone