


**CALIFORNIA COASTAL COMMISSION**

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Staff: CP-LB  
Staff Report: 10/6/97  
Hearing Date: Nov. 4-7, 1997  
Commission Action:



CF

**RECORD PACKET COPY**STAFF REPORT: CONSENT CALENDAR

APPLICATION NO.: 5-97-287

APPLICANT: Dr. Warren Walker

AGENT: Diana Pollard

PROJECT LOCATION: 2017-2019 Ocean Front Walk, Venice, City of Los Angeles, Los Angeles County.

PROJECT DESCRIPTION: Construction of a one-story with loft, 2,100 square foot retail structure with eleven on-site parking spaces on a vacant lot currently used as an outdoor vending site. The applicant also proposes a payment of \$18,000 to the City of Los Angeles Venice Coastal Parking Impact Trust Fund in lieu of a twelfth parking space.

Lot Area	4,590 sq. ft.
Building Coverage	2,565 sq. ft.
Pavement Coverage	2,022 sq. ft.
Landscape Coverage	3 sq. ft.
Parking Spaces	11
Zoning	C1-1
Plan Designation	Commercial
Ht abv fin grade	30 feet

SUMMARY OF STAFF RECOMMENDATION:

The applicant is seeking the Commission's approval of the same project approved by on July 11, 1995 pursuant to Coastal Development Permit application 5-95-110. Coastal Development Permit 5-95-110 expired on July 11, 1997 as no permit extension request was received by the Commission. Staff recommends approval of Coastal Development Permit application 5-97-287 with the same conditions adopted for Coastal Development Permit 5-95-110 regarding parking, signage, use of the arcade and structure, and encroachments into public ways. The applicant agrees with the recommendation.

## LOCAL APPROVALS:

1. City of Los Angeles Local Coastal Development Permit 95-001, 3/22/95.
2. City of Los Angeles Project Permit Case No. 95-0010.
3. City of Los Angeles 1-year Extension of Time for Local Coastal Development Permit 95-001 & Project Permit Case No. 95-0010, 4/1/97.

## SUBSTANTIVE FILE DOCUMENTS:

1. Coastal Commission Interpretive Guidelines, Los Angeles County, 1981.
2. City of Los Angeles Venice Interim Control Ordinance (ICO) #169,239.
3. Coastal Development Permit 5-86-133 (Chang/Walker/Block).
4. Coastal Development Permit 5-89-599 (Elzas Family Trust).
5. Coastal Development Permit 5-95-110 & amendment (Walker).

STAFF RECOMMENDATION

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions

The Commission hereby grants, subject to the conditions below, a permit for the proposed development on the grounds that the development, as conditioned, will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act, is located between the sea and first public road nearest the shoreline and is in conformance with the public access and public recreation policies of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions

1. Notice of Receipt and Acknowledgment The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Compliance All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. Assignment The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

### III. Special Conditions

#### 1. Parking

Prior to issuance of the Coastal Development Permit, the applicant shall record a deed restriction on the property, in a form and content acceptable to the Executive Director, which requires the following:

- a. The applicant shall provide and maintain a minimum of eleven on-site parking spaces at 2017-2019 Ocean Front Walk available for use by the general public and the customers and employees of the commercial establishments within the approved structure.
- b. All required parking spaces shall be open and available for use by the general public, customers and employees during all business hours of the commercial establishments within the approved structure.
- c. Any fee charged for public parking at 2017-2019 Ocean Front Walk shall not exceed the rate charged by the Los Angeles County public parking lots in the North Venice area.
- d. Customers of the commercial establishments located at 2017-2019 Ocean Front Walk shall be allowed one hour of free on-site parking with a validation available at all of the commercial establishments within the approved structure.
- e. Employee carpools with two or more persons who work at the site shall be provided with free long-term parking at 2017-2019 Ocean Front Walk.

The deed restriction shall run with the land, binding successors and assigns, and shall be recorded free of prior liens.

2. Parking Signs

Prior to the issuance of the Coastal Development Permit, the applicant shall submit a plan for a parking sign program consistent with condition one above. The plan shall be subject to the review and approval of the Executive Director. The plan shall include signs that clearly announce the availability of the parking area for public, employee and customer use, the cost of parking, and the availability of one hour of validated free parking for customers of the commercial establishments located at 2017-2019 Ocean Front Walk. The signs shall be posted in conspicuous locations on the applicant's approved structure. The signs shall not rotate, flash, or be internally illuminated. The applicant shall maintain the approved development consistent with the parking sign program.

3. Arcade Use

Prior to issuance of the Coastal Development Permit, the applicant shall record a deed restriction on the property, in a form and content acceptable to the Executive Director, which requires the following:

- a. The arcade area shall remain open for pedestrian access and shall not be enclosed during the hours that the development is open for business. The arcade area may be temporarily closed for security purposes during the hours that the development is not open for business by the use of the following devices: expanded metal gates, steel or wrought iron gates, solid roll down doors or rolling grills.
- b. No retail sales, merchandise racks, or display of items for sale are permitted within the arcade area until the applicant submits evidence, for the review and approval of the Executive Director, that an in lieu fee of \$18,000 has been accepted by the City of Los Angeles for payment into the Venice Coastal Parking Impact Trust Fund.
- c. After the in lieu fee of \$18,000 has been paid into the City's Venice Coastal Parking Impact Trust Fund, and evidence of the payment has been accepted and approved by the Executive Director, up to two hundred square feet of the arcade area may be used for retail sales, merchandise racks, and the display of items for sale. The remaining arcade area shall remain available for pedestrian access.

The deed restriction shall run with the land, binding successors and assigns, and shall be recorded free of prior liens.

4. Use of Structure

The use of the approved structure is for general retail use only. Any intensification or change in use of the structure, including fast food and restaurant service, will require an amendment to the permit or a new Coastal Development Permit.

## 5. Encroachments

There shall be no encroachment onto or over any portion of Ocean Front Walk, North Venice Boulevard, or any other public right-of-way by the applicant, leaseholders, or operators of the commercial establishments within the approved structure. Prohibited encroachments include, but are not limited to, signs, tables, displays, and merchandise racks. Flags on the facade of the structure may be permitted to encroach over the public rights-of-way provided that they conform with the plan approved as part of Coastal Development Permit 5-97-287.

## 6. Signs

All signs on the approved structure shall be limited to twenty square feet in area. There shall be no more than one sign larger than ten square feet for each commercial establishment in the structure. No sign shall exceed the height of the roof. No sign shall rotate, flash, or be internally illuminated.

## IV. Findings and Declarations

The Commission hereby finds and declares:

### A. Project Description and Background

The applicant proposes to construct a one-story with loft, thirty foot high, 2,100 square foot commercial retail building on an Ocean Front Walk site in North Venice (Exhibit #2). As proposed by the applicant, the use of the commercial structure will be limited to general retail sales. No restaurant or food sales are proposed. The two-lot site is currently used for an outdoor vending operation. The proposed project was approved by the City of Los Angeles in Local Coastal Development Permit 95-001. The proposed project was also approved by the Commission on July 11, 1995 pursuant to Coastal Development Permit application 5-95-110. However, Coastal Development Permit 5-95-110 expired on July 11, 1997 as no permit extension request was received by the Commission.

The 4,590 square foot commercially zoned site is located on the corner of Ocean Front Walk and North Venice Boulevard (Exhibit #3). Ocean Front Walk is a popular commercial and residential pedestrian street on the beachfront which attracts many tourists and day visitors. Parking spaces are always in great demand in the area. A county run public beach parking lot is located across Ocean Front Walk in front of the site.

The proposed project provides eleven on-site parking spaces on the rear of the site behind the proposed structure (Exhibit #3). Nine of the eleven on-site parking spaces are accessed from the rear alley, Speedway. The other two on-site parking spaces are accessed from North Venice Boulevard. A loading zone is also provided on the rear of the site adjacent to Speedway. The applicant also proposes a payment of \$18,000 to the City of Los Angeles Venice Coastal Parking Impact Trust Fund in lieu of a twelfth parking space.

The design of the proposed structure includes an open arcade along the Ocean Front Walk frontage (Exhibits #4&5). The proposed arches and arcade reflect the historic nature of the boardwalk. The ten foot wide, five hundred square foot arcade area is located entirely on the applicant's private property, but directly abuts the Ocean Front Walk public right-of-way (Exhibit #3). The City granted the project a variance which allows a zero foot structural setback from the Ocean Front Walk and North Venice Boulevard property lines.

The height of the proposed roof parapet around the majority of the structure is 23 feet high. However, a thirty foot high architectural tower is proposed at one corner of the structure (Exhibit #4). Seven roll-up doors are proposed along the Ocean Front Walk and North Venice Boulevard frontages. The five hundred square foot arcade area will remain open during all hours that the development is open for business.

In a prior action, the Coastal Commission approved Coastal Development Permit 5-86-133 (Chang/Walker/Block) in 1986 permitting the site to be used for an outdoor vending operation. Fourteen vending stalls with fourteen on-site parking spaces were permitted. According to City records, the site has been used for outdoor sales since 1983.

Coastal Development Permit application 5-95-110 was approved by the Commission on July 11, 1995. Coastal Development Permit 5-95-110 was amended on October 11, 1996 allowing the five hundred square foot arcade area to be closed after hours as long as it remains open during all hours that the development is open for business. Coastal Development Permit 5-95-110 expired on July 11, 1997 as no permit extension request was received by the Commission. The currently proposed development is the same project that was approved by Coastal Development Permit 5-95-110 as amended. The conditions of approval, which are currently in the process of being recorded on the deed as required by special conditions one and three, are the same conditions imposed by the Commission on Coastal Development Permit 5-95-110 as amended.

#### B. Public Access and Parking

The proposed project is located on Ocean Front Walk in the North Venice area. The most important coastal planning issue for the North Venice area is the provision of adequate parking facilities to assure continued public access opportunities to the highly popular coastal area.

Many of the existing commercial structures in this area were constructed decades ago at a time when the parking demands generated by commercial development were significantly less than they are today. In addition, many older residential structures along Ocean Front Walk have been converted to commercial uses without providing adequate parking. Consequently, there is a severe shortage of available parking spaces in the area during peak beach use times. This parking shortage has resulted in intense competition for parking resources between the area's various commercial, residential and recreational uses. This situation has negatively impacted the availability of public access to the coast.

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

Section 30252 of the Coastal Act states, in part:

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

Therefore, in order to conform to the requirements of the Coastal Act, the proposed project must provide an adequate parking supply. The Commission has historically used the parking standards in the Interpretive Guidelines to determine the whether a proposed project provides adequate parking facilities. For general retail uses, the parking standards in the Commission's Interpretive Guidelines for Los Angeles County require the provision of one parking space for each 225 square feet of floor area.

In addition, because the proposed project is located within the Beach Impact Zone (BIZ) of the North Venice area as defined in the City of Los Angeles Venice Coastal Interim Control Ordinance (ICO) #169,239, the proposed project must also provide Beach Impact Zone parking spaces. The Beach Impact Zone parking requirements apply to all new commercial developments in the Beach Impact Zone, and are in addition to the standard parking requirements. The parking spaces generated by the Beach Impact Zone parking requirements help offset the cumulative impacts on public access opportunities caused by the intensification of commercial enterprises in the Venice area. One Beach Impact Zone parking space is required for each 640 square feet of ground floor commercial area. The City allows the option of paying an in lieu fee of \$18,000 per required Beach Impact Zone parking space (up to two spaces) into the Venice Coastal Parking Impact Trust Fund. The Venice Coastal Parking Impact Trust funds are used to increase the parking supply in the Venice area.

The applicant proposes to provide eleven on-site parking spaces in order to meet the Commission's parking requirements and the City's Beach Impact Zone parking requirements (Exhibit #6). Nine parking spaces are provided to meet the 1 space/225 square feet ratio for the proposed 2,100 square feet of general retail use. Two additional parking spaces are proposed to meet the Beach Impact Zone parking requirement.

The eleven proposed on-site parking spaces and a loading zone are provided in a parking lot located at the rear of the subject site (Exhibit #3). Nine of the eleven on-site parking spaces are accessed from Speedway, the rear alley. The other two on-site parking spaces are accessed from North Venice Boulevard.

The Commission finds that the proposed eleven space parking lot is adequate to meet the parking demands of the proposed 2,100 square feet of general retail area. However, the proposed 2,100 square feet of general retail area does not include the five hundred square foot area located under the arcade (Exhibit #3). The five hundred square foot arcade area was not included in the applicant's parking calculation (Exhibit #6).

In order to allow the use of up to two hundred square feet in the arcade to be used for retail sales and displays, the applicant has proposed a payment of \$18,000 to the City of Los Angeles Venice Coastal Parking Impact Trust Fund in lieu of a twelfth parking space. The twelfth parking space would meet the parking demand generated by the additional retail sales area in the arcade.

In its approval of Coastal Development Permit 5-95-110 (Walker), the Commission found that the applicant's proposal to pay an \$18,000 to the City of Los Angeles Venice Coastal Parking Impact Trust Fund in lieu of a twelfth parking space was consistent with Section 30252 of the Coastal Act which requires the provision of adequate parking facilities. In this case, the Commission again finds that the applicant's proposal to pay an \$18,000 to the City of Los Angeles Venice Coastal Parking Impact Trust Fund in lieu of a twelfth parking space is consistent with the requirements of the Coastal Act if the permit is conditioned to require the applicant to conform to the proposal.

Therefore, a condition of approval requires the applicant to record a deed restriction on the property, in a form and content acceptable to the Executive Director, which requires the following:

- a. The arcade area shall remain open for pedestrian access and shall not be enclosed during the hours that the development is open for business. The arcade area may be temporarily closed for security purposes during the hours that the development is not open for business by the use of the following devices: expanded metal gates, steel or wrought iron gates, solid roll down doors or rolling grills.
- b. No retail sales, merchandise racks, or display of items for sale are permitted within the arcade area until the applicant submits evidence, for the review and approval of the Executive Director, that an in lieu fee of \$18,000 has been accepted by the City of Los Angeles for payment into the Venice Coastal Parking Impact Trust Fund.
- c. After the in lieu fee of \$18,000 has been paid into the City's Venice Coastal Parking Impact Trust Fund, and evidence of the payment has been accepted and approved by the Executive Director, up to two hundred square feet of the arcade area may be used for retail sales, merchandise racks, and the display of items for sale. The remaining arcade area shall remain available for pedestrian access.

Only as conditioned is the proposed project consistent with the coastal access policies of the Coastal Act.

As previously stated, the proposed eleven on-site parking spaces are adequate to serve 2,100 square feet of general retail use. The Commission routinely places conditions on permits to ensure that the proposed parking supplies are actually used to meet the demands of approved projects. Therefore, the permit is conditioned to require the applicant to record a deed restriction which requires that the eleven parking spaces required for the general retail use be made available to the general public, customers and employees of the commercial establishments within the approved project during all business hours.



In addition, customers of the establishments shall be granted validations for one hour of free parking. The Commission required the provision of one hour of free customer parking when it approved Coastal Development Permits A5-90-789 (Blanchard), 5-89-599 (Elzas Family Trust), and 5-95-110 (Walker), also in the North Venice area.

Signs must be posted which announce the availability of the eleven on-site parking spaces for use by the public, customers and employees of the retail establishment. Employee car pools shall be encouraged with the provision of free parking, and finally, fees charged for parking shall not exceed the fees charged at the Los Angeles County beach parking lots so that commercial customers are not encouraged to use beach parking for while shopping. Only as conditioned is the proposed project consistent with the coastal access policies of the Coastal Act.

As previously stated, the proposed use of the commercial structure is for general retail sales only. No restaurant or food sales have been proposed. Restaurant uses and food sales have different parking requirements than general retail uses. Therefore, if the applicant wishes to use the proposed structure for any use other than general retail use (such as food service), a new Coastal Development Permit or amendment to this permit must be obtained. Any additional impacts on public access will be analyzed at that time. Only as conditioned does the Commission find that the proposed project consistent with the coastal access policies of the Coastal Act.

Replacement parking has often been an issue in many new developments in the North Venice area. In its actions on prior permits in this area of Venice, the Commission has found that it is necessary to require fifty percent replacement of parking spaces formerly available to the public when new development is proposed. However, the fifty percent replacement standard does not apply to this project because the site has not been available to the general public for parking. The site has been used for outdoor vending since 1983.

Another important coastal access issue is the protection of pedestrian access and safety along the boardwalk and side streets. The proposed project must not inhibit the use of Ocean Front Walk as a pedestrian boardwalk or North Venice Boulevard as a coastal access route. Many structures are set back from Ocean Front Walk and side streets in order to provide space for signs and small displays. However, because the proposed structure is not set back from the front and side property lines, a condition must be applied to the permit to ensure that there are no encroachments onto Ocean Front Walk or North Venice Boulevard. Placement of any object outside of the arcade area or the doors along North Venice Boulevard will partially block Ocean Front Walk and North Venice Boulevard, both public rights-of-way.

Therefore, there shall be no encroachment onto or over any portion of Ocean Front Walk, North Venice Boulevard, or other public right-of-way by the applicant, leaseholders, or operators of the commercial establishments within the approved structure. Prohibited encroachments include, but are not limited to, signs, tables, displays, and merchandise racks. Flags on the facade of the structure may be permitted to encroach over the public rights-of-way provided that they conform with the plan approved as part of Coastal

Development Permit 5-97-287. Only as conditioned is the proposed project consistent with the coastal access policies of the Coastal Act.

All identified impacts on public access caused by the proposed project have been adequately mitigated by special conditions of approval. Therefore, the Commission finds that the proposed project, as conditioned, is consistent with the coastal access policies of the Coastal Act.

### C. Community Character

Section 30251 of the Coastal Act states in part that:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas...be visually compatible with the character of surrounding areas...

The project site is located on Ocean Front Walk which is a public walkway used for walking, skating, and bicycle riding. Ocean Front Walk is adjacent to Venice Beach. Venice Beach is a very popular, highly utilized public recreation area. The beach is a very wide, sandy beach which can accommodate large numbers of visitors. Venice Beach is a popular destination for both international and domestic tourists, as well as Southern California area residents.

As required by the Coastal Act, the visual qualities of this coastal area shall be protected from negative impacts such as excessive building heights and bulks, and unnecessary visual clutter.

The North Venice community is comprised mostly of older one and two-story single and multi-family residences, along with many commercial uses along Ocean Front Walk. The majority of the structures in the area are at or below thirty feet in height. The Commission has limited new development in the North Venice area to a height of thirty feet to protect the visual quality and community character of the area. The proposed project is thirty feet high. Therefore, it conforms to the character of the community and previous Commission approvals.

The local community and the Commission are also concerned about the design and appearance of the commercial structures which line the inland side of Ocean Front Walk. Exterior signs and other advertising on structures can negatively impact the visual quality of the area. The design of the signs for the proposed project has not been completed at this time. Exterior signs will be attached to the approved structure after construction is completed.

Therefore, in order to protect against excessive visual impacts caused by signs, the approval of the project is conditioned to limit the size and type of exterior signs that may be attached to the approved structure. Signs on the proposed structure shall be limited to twenty square feet in area and there shall be no more than one sign larger than ten square feet for each

commercial establishment in the structure. In addition, no sign shall exceed the height of the roof, and no sign shall rotate, flash, or be internally illuminated. As conditioned, will not negatively affect the visual quality of the area, and is consistent with Section 30251 of the Coastal Act.

D. Local Coastal Program

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Development Permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act:

- (a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200). A denial of a Coastal Development Permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.

A preliminary draft of the North Venice Land Use Plan was prepared by the City of Los Angeles in 1980. However, no action was taken by the City or by the Commission to certify the draft Land Use Plan. Therefore, the City has not yet developed a Local Coastal Program or a Land Use Plan that has been certified by the Commission.

The Venice Interim Control Ordinance (ICO) was developed to limit the intensity of development that may occur while a certifiable LCP is developed. Approval of new developments without implementation of the parking requirements of the Venice ICO, including the Beach Impact Zone requirements, could prejudice the City's ability to develop a certifiable LCP with policies which protect coastal access from the negative impacts caused by commercial intensification of the area. Only by providing the required amount of parking spaces is the proposed project consistent with the coastal access policies of the Coastal Act.

Therefore, the Commission finds that, as conditioned, the proposed project is consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

E. California Environmental Quality Act (CEQA)

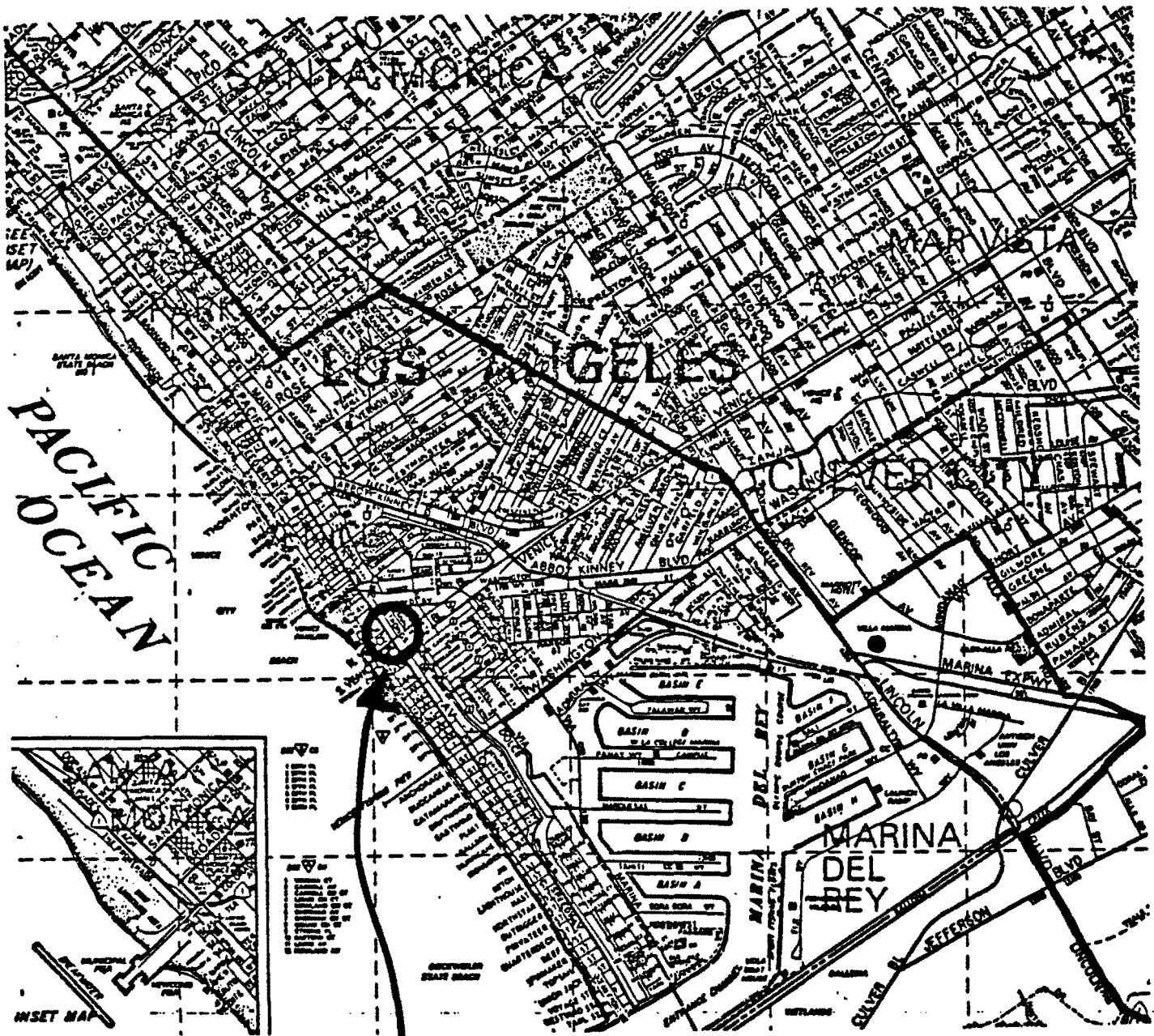
Section 13096(a) of the California Code of Regulations requires Commission approval of Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval,

to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

The proposed project, only as conditioned, supplies adequate parking and will not create negative environmental impacts which have not been mitigated. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

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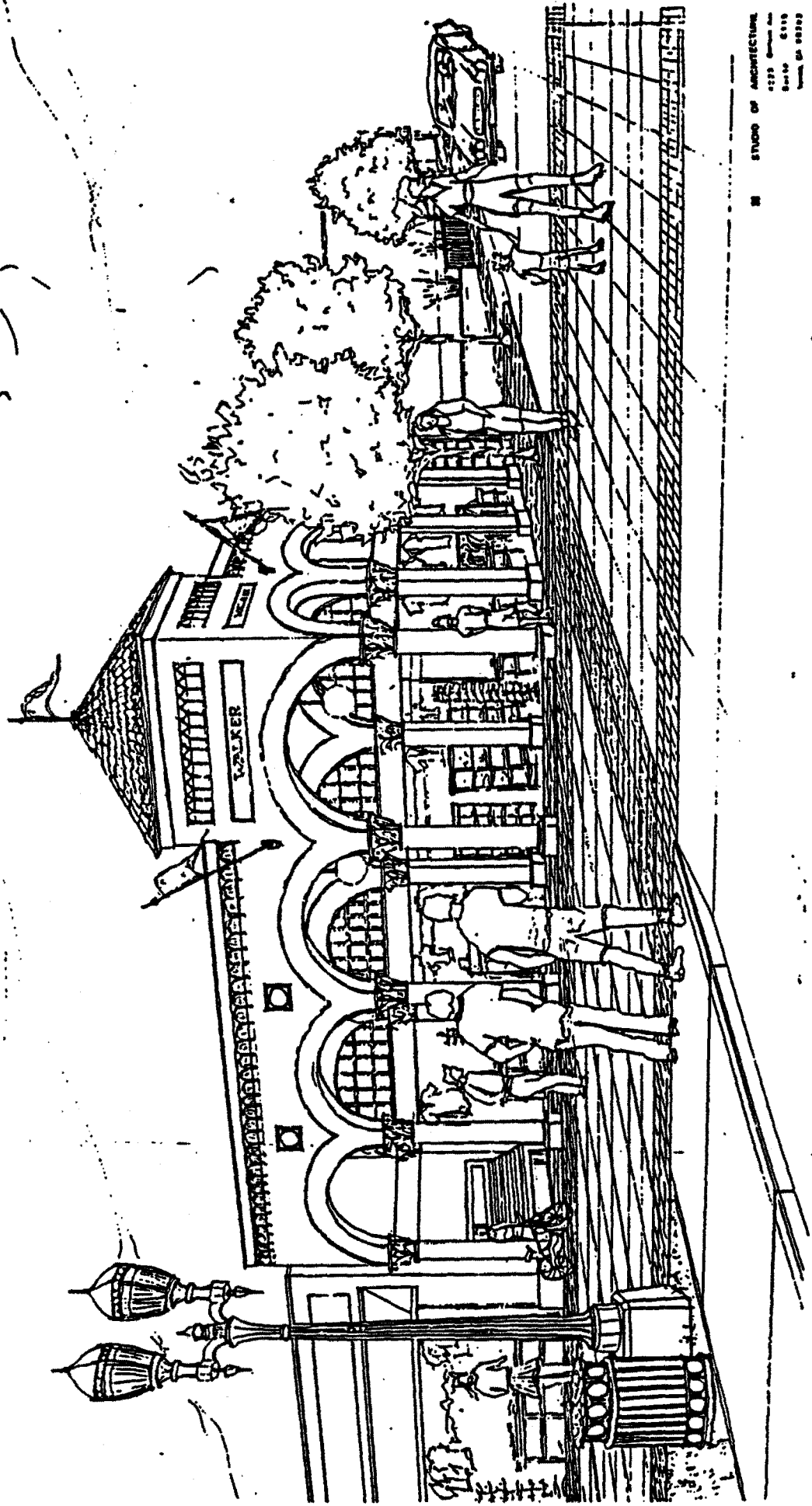
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5-97-287

EXHIBIT # 1  
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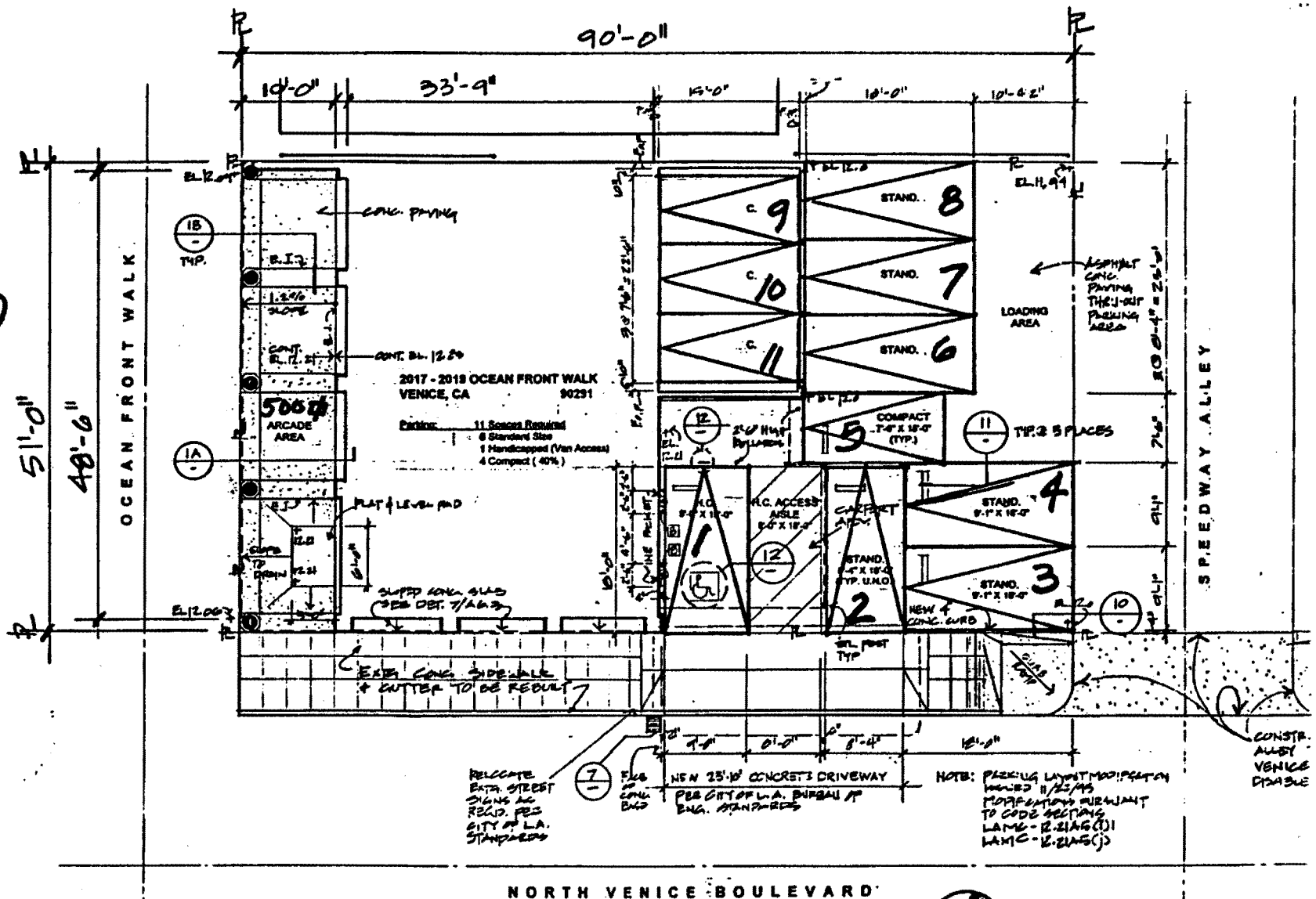
STUDIO OF ARCHITECTURE  
 4220 Ocean Ave.  
 Suite 100  
 Venice, CA 90290

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 5-97-287

2017 OCEAN FRONT WALK  
 Venice Beach Boardwalk

EXHIBIT # 2  
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VENICE BEACH



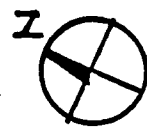
NORTH VENICE BOULEVARD



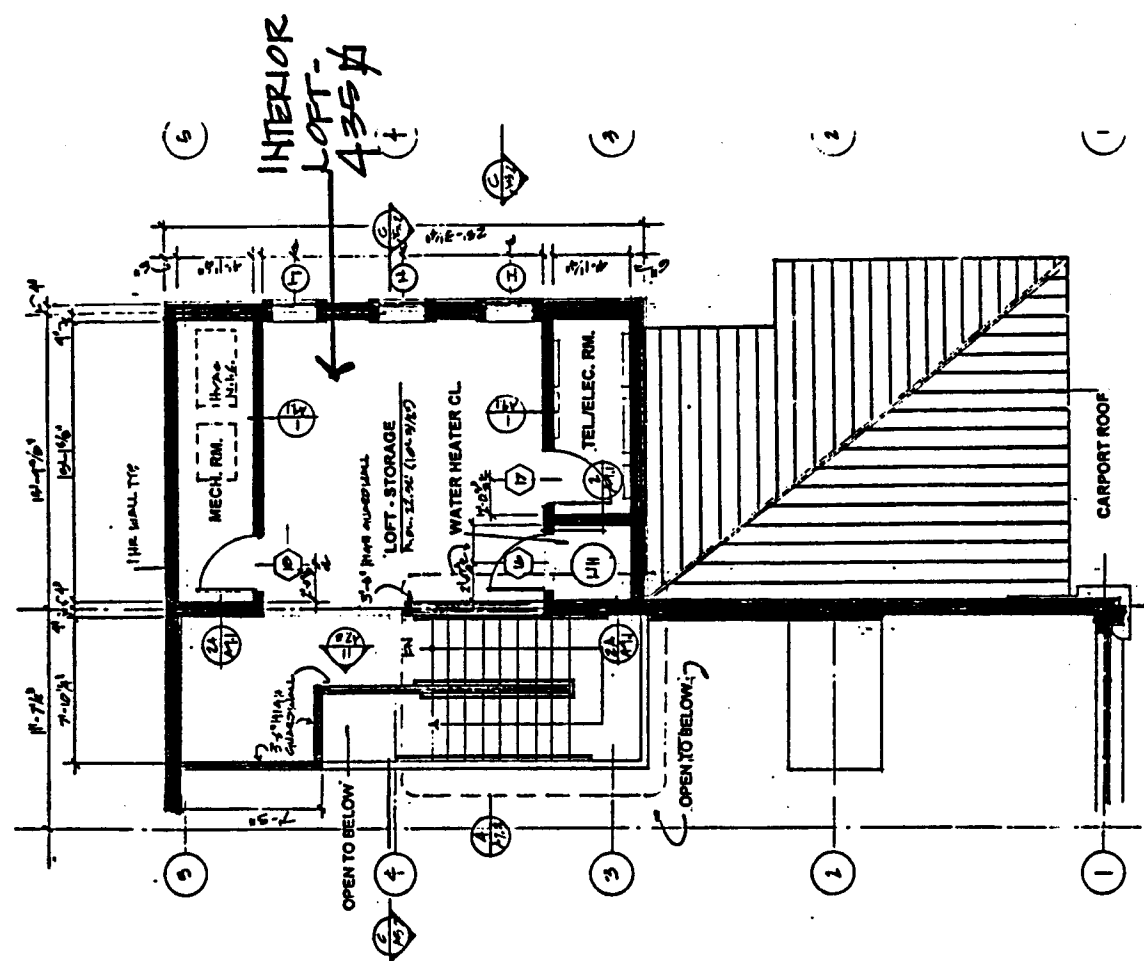
SITE PLAN  
COASTAL COMMISSION  
5-97-287  
EXHIBIT # 3  
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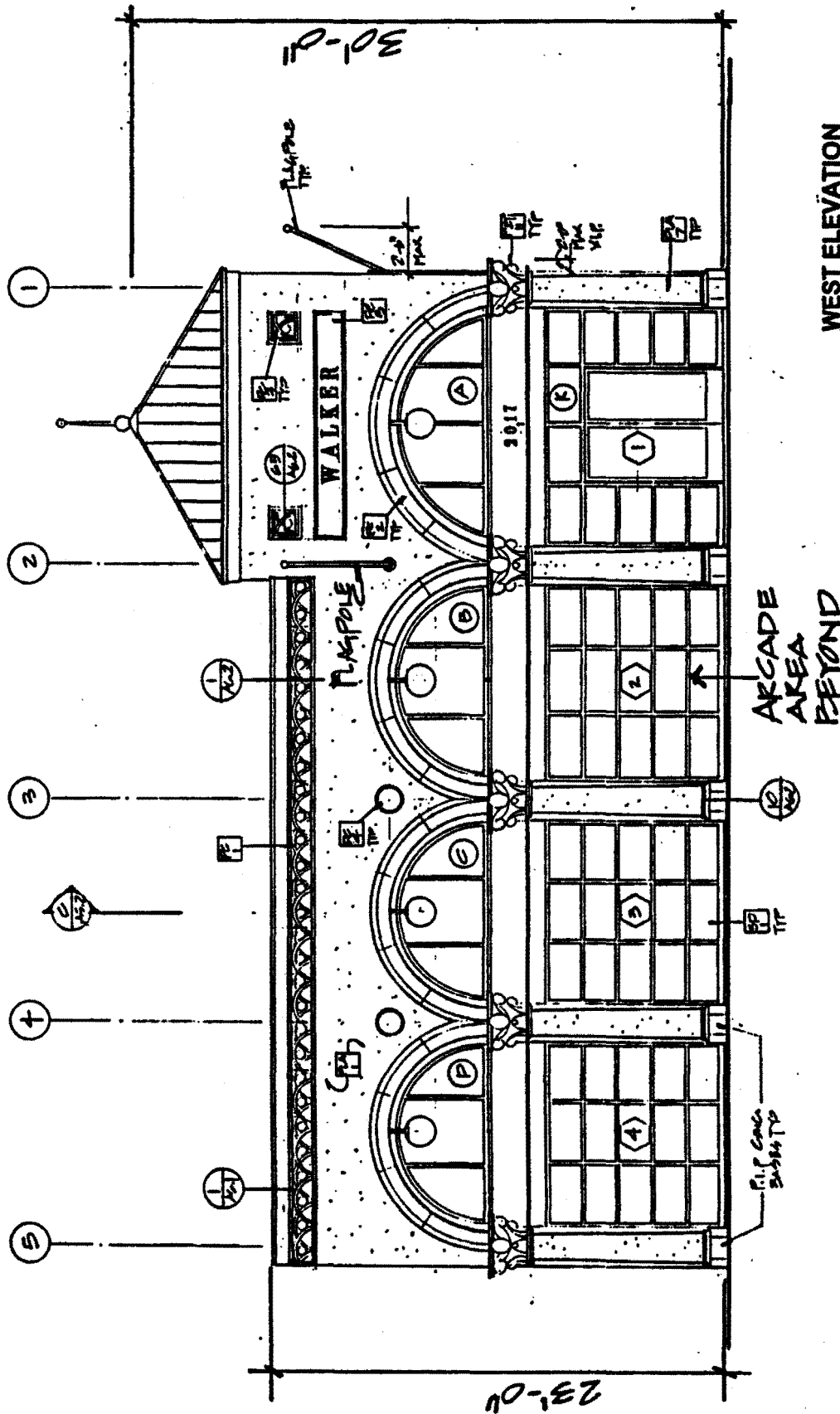






SECOND FLOOR PLAN





WEST ELEVATION  
OCEAN FRONT WALK ELEVATION

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5-97-287

EXHIBIT # 4  
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STUDIO OF ARCHITECTURE

WALKER BUILDING  
2017-2019 OCEAN FRONT WALK  
VENICE, CA 90291

PROPOSED DEVELOPMENT

Lot Area 51'x 90': 4,590 s.f.

Building Height: (grade to parapet) 23' - 0"  
(grade to tower) 30' - 0"

Ground Floor:

Retail Area 1510 S.F.  
Trash Area 50 S.F.  
Stair 105 S.F.

Ground Floor SubTotal 1665 S.F.

Arcade not included.\*  
(500~~0~~)

Second Level:

Loft Storage 278 S. F.  
Mechanical & Electrical Spaces 157 S. F.  
Second Floor SubTotal 435 S.F.

Total Square Footage 2100 S.F.

Parking:

$2100/225 = 9.3 = 9$  spaces (Per Iterim Control Ordinance)

$1510/640 = 2.3 = 2$  Spaces (Beach Impact Zone)

11 Spaces Required

11 Spaces Provided

- \* 7 Full Size ( 1 Handicapped )  
4 Compact ( 40% )

LEGAL DESCRIPTION

Lots 6 and 7, Block 4  
Shortline Beach Subdivision

COASTAL COMMISSION

5-97-287

EXHIBIT # 6

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\*200 Sq. Ft. of Arcade area may be used for  
retail sales & display pursuant to the  
provision of a 12<sup>th</sup> parking space or  
payment of an in lieu fee to the Venice Furr