

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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**RECORD PACKET COPY**

Filed: 6/28/01  
 49th Day: 8/16/01  
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 Staff: CP-LB  
 Staff Report: 9/20/01  
 Hearing Date: October 8, 2001  
 Commission Action:

**Item M8e****STAFF REPORT: REGULAR CALENDAR**

**APPLICATION NUMBER:** 5-01-162

**APPLICANT:** Neptide Investments (Nigel Carroll)

**AGENT:** Quality Mapping Service (Peter Elias)

**PROJECT LOCATION:** 16 Paloma Avenue, Venice, City of Los Angeles.

**PROJECT DESCRIPTION:** Construct 7.5-foot high masonry block wall in public right-of-way.

Lot Area	3,525 square feet
Building Coverage	1,908 square feet
Pavement Coverage	1,029 square feet
Landscape Coverage	588 square feet
Parking Spaces	2
Zoning	RD1.5-1
Plan Designation	Multi-family Residential/Low Medium II
Ht above final grade	7.5-foot garden wall

**LOCAL APPROVALS:**

1. City of Los Angeles Local Coastal Development Permit, West Los Angeles Area Planning Commission Case No. 2000-4065 (CDP), 1/23/01.
2. City of Los Angeles Specific Plan Exception, West Los Angeles Area Planning Commission Case No. 2000-4065 (SPE), 1/23/01.
3. City of Los Angeles Specific Plan Project Permit, West Los Angeles Area Planning Commission Case No. 2000-4065 (DD), 1/23/01.
4. City of Los Angeles Yard Variance, West Los Angeles Area Planning Commission Case No. 2000-4065 (YV), 1/23/01.

**SUMMARY OF STAFF RECOMMENDATION**

Staff is recommending that the Commission **DENY** the coastal development permit for the proposed project because it does not comply with the public access policies and Sections 30251 and 30253 of the Coastal Act which require that the scenic and visual qualities of special coastal communities be protected. The proposed 7.5-foot high wall would block public views and negatively affect the character of the historic walk street where it is proposed to be erected. Approval of the wall would also prejudice the ability of the City to prepare an LCP that conforms with Chapter 3 policies of the Coastal Act because the proposed wall exceeds the 42-inch height limit for walls along the historic Venice walk streets. The applicant objects to the staff's recommendation.

**SUBSTANTIVE FILE DOCUMENTS:**

1. Certified Land Use Plan for Venice, City of Los Angeles, 6/12/01.
2. Venice Specific Plan, City of Los Angeles Ordinance No. 172897.
3. Coastal Development Permit 5-82-447 (Sohn).
4. Coastal Development Permit 5-01-131 (Smith).

**STAFF RECOMMENDATION:**

The staff recommends that the Commission vote **NO** on the following motion and adopt the resolution to **DENY** the coastal development permit application:

**MOTION:** *"I move that the Commission approve Coastal Development Permit Application No. 5-01-162 as submitted by the applicant."*

Staff recommends a **NO** vote and adoption of the following resolution and findings.

**I. RESOLUTION FOR DENIAL**

The Commission hereby **denies** a coastal development permit for the proposed development on the grounds that the development will not be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976 and would 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. Approval of the permit application would not comply with CEQA because there are feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

**II. FINDINGS AND DECLARATIONS**

The Commission hereby finds and declares:

**A. Project Description**

The applicant proposes to construct 7.5-foot high masonry block wall to enclose the front yard area (including 15'x 30' portion of the 40-foot wide public right-of-way) of an existing two-story single family residence (Exhibit #3). The existing residence was approved by the Commission on August 11, 1982 [See Coastal Development Permit 5-82-447 (Sohn)]. A 6.5-foot high wall currently exists where the currently proposed 7.5-foot high wall is proposed to be constructed (Exhibit #5). The Commission did not authorize construction of the existing wall in Coastal Development Permit 5-82-447 or any other action.

The existing two-story single family residence, which is not proposed to be altered, is located on Paloma Avenue, an historic Venice walk street<sup>1</sup> (Exhibit #6). The certified Venice LUP identifies the historic Venice walk streets as protected coastal accessways. The walk streets in North Venice, Marina Peninsula and Milwood neighborhoods of Venice are among the most pleasant pedestrian amenities in Los Angeles and provide excellent vertical access to the beach. The Paloma Avenue walk street connects directly to the Venice Boardwalk (Ocean Front Walk) which extends approximately 1.5 miles along the sand, providing immediate access to the beach (Exhibit #2).

The applicant has received the City's approval (local coastal development permit, specific plan exception and yard variance) for the proposed 7.5-foot high wall. The applicant originally requested City approval for a 9-foot high wall, but the City's approval limits the wall height to 7.5-feet above the public sidewalk. The City found that the applicant's need for privacy and security justify the need for a 7.5-foot high wall, and that the project site is unique because it abuts Speedway alley, the primary vehicular accessway in the neighborhood. The City's approval includes a variance and code exception permitting the wall to exceed the Venice Specific Plan's 42-inch height limit for walls on walk streets (Ordinance No. 172897).

The proposed wall also exceeds the certified Venice Land Use Plan (LUP) 42-inch height limit for walls on Venice walk streets. The applicant is requesting that the Commission approve an exception to the LUP 42-inch height limit and approve the requested 7.5-foot wall height. The applicant proposes to landscape the façade of the proposed masonry wall with a creeping vine plant (Exhibit #4). The applicant states that the proposed 7.5-foot height is necessary for the protection of his privacy and security.

The project site is located one block inland of the beach (Exhibit #2). The surrounding neighborhood is comprised of both old and new one, two and three-story single family residences and multi-family residential structures. The fronting right-of-way, Paloma Avenue, is a walk street that provides direct pedestrian access to Ocean Front Walk and Venice Beach. Vehicular use of Paloma Avenue is prohibited. The front yard area of each residential lot situated along the Paloma Avenue walk street, including the subject property, has been allowed to encroach up to fifteen feet onto the City's forty-foot wide right-of-way, leaving a minimum ten-foot wide pedestrian accessway leading to the beach (Exhibit #2). All of the properties along Paloma Avenue, including the subject property, have fences or walls that enclose the yards and the right-of-way encroachment areas. Many of these yard enclosures were erected without permits and about half of them exceed the 42-inch height limit. The proposed 7.5-foot high wall would be as high as the highest existing wall on the walk street.

The Commission has routinely approved front yard encroachments on the historic Venice walk streets, finding that the landscaped encroachment areas maintain the unique and historic character of the pedestrian accessways. The Commission has not approved any structures in

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<sup>1</sup> A walk street is a public street in the coastal zone and/or beach area that has been improved for public pedestrian use over part of its width and is landscaped (privately or publicly) over the remainder, but which has not been improved for vehicular access.

the rights-of-way (encroachment areas) except for fences and walls that conform to the 42-inch height limit. Parking and vehicular access is not permitted on the walk streets.

The Commission has recognized in both prior permit and appeal decisions that North Venice, where the proposed project is located, is a unique coastal community [e.g. Coastal Development Permit 5-90-396 (Ehrman)]. In 1980, the Commission adopted the Regional Interpretive Guidelines for Los Angeles County which included specific building standards for the various Venice neighborhoods, including the North Venice neighborhood. These building standards, which apply primarily to density, building height and parking reflect conditions imposed in a series of permits heard prior to 1980. The Commission has consistently applied these density, height and parking standards to development in the Venice coastal zone in order to protect public access to the beach and to preserve community character. The Regional Interpretive Guidelines for Los Angeles County contain the 42-inch height limit for walls on the Venice walk streets.

On October 29, 1999, the Los Angeles City Council adopted a proposed Land Use Plan (LUP) for Venice and submitted it for Commission certification as part of the City's effort to develop a certified Local Coastal Program (LCP) for Venice. On November 14, 2000, the Commission approved the City's proposed LUP for Venice with suggested modifications. On March 28, 2001, the Los Angeles City Council accepted the Commission's suggested modifications and adopted the Venice LUP as it was approved by the Commission on November 14, 2000. The Commission officially certified the Venice LUP on June 12, 2001.

The policies and building standards contained in the Venice LUP reflect the Commission's prior actions in the area, the Commission's 1980 Interpretive Guidelines, and the existing character of each Venice neighborhood. The Commission-certified LUP for Venice, however, also contains some updated and revised building standards for the various Venice neighborhoods, including the North Venice neighborhood where the proposed project is situated. The 42-inch height limit for walls on walk streets, contained in the 1980 Interpretive Guidelines, was not changed and was included in the certified Venice LUP.

One change adopted as part of the certified Venice LUP is the lowering of the height limit to 28 feet for all new residential development situated along the Venice walk streets. Formerly, the height limit for development on the walk streets was the same as the general height limit for each Venice neighborhood. In North Venice, the general height limit before the adoption of the certified LUP was thirty feet. The certified LUP height limit for North Venice is currently 35 feet, except for flat roofed projects which are still limited to thirty feet and residences along walk streets which is now limited to 28 feet.

Although the standard of review for the proposed development is the Chapter 3 policies of the Coastal Act, the Commission-certified LUP for Venice now provides specific guidance for the Commission's interpretation of the relevant Chapter 3 policies. A coastal development permit is approved only the proposed development it is found to be consistent with the Coastal Act.

**B. Public Access and Recreation**

One of the basic goals stated in the Coastal Act is to maximize public access and recreation along the coast. The Commission, in past actions, has found that the Venice walk streets are coastal accessway that must be protected in order to maximize public access and recreation along the coast consistent with the following Coastal Act policies:

Section 3010 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30213 of the Coastal Act states, in part:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

The Coastal Act and the policies of the certified Venice LUP protect public access along the historic Venice walk streets. The following policy of the certified Venice LUP protects the Venice walk streets for public pedestrian access:

- **Policy II. C. 7. Walk Streets.** *Designated walk streets shall be preserved and maintained at their present widths for public pedestrian access to the shoreline and other areas of interest and to preserve views along and from the public right-of-way. Vehicular access on walk streets shall be restricted to emergency vehicles. The minimum width of the pedestrian path shall be 10-12 feet in the North Venice and Peninsula areas and 4½ feet in the Milwood area. The remaining public right-of-way shall be limited to grade level uses including landscaping, patios, gardens and decks.*

Section 30251 of the Coastal Act (see Section C of this report) also requires that scenic and visual resources, including the public views down the Venice walk streets, be considered and protected as a resource of public importance. In addition, The Commission's Interpretive Guidelines for Los Angeles County specifically state that the North Venice walk streets should be preserved as walk streets in order to preserve community character and enhance visual resources. The Commission has consistently supported the City's efforts to preserve the walk

streets and unique community character by permitting vehicular access only on the rear alleys (not on walk streets), and by prohibiting blank building walls and common wall construction over more than two lots along the walk streets.

The public pedestrian walkways within the walk street rights-of-way are protected, while the adjacent residences have been permitted to encroach within the remainder of the public right-of-way. Encroachments are limited to grade level uses including landscaping, patios, gardens, decks, and fences or walls that do not exceed 42 inches in height. The certified Venice LUP states:

- **Policy II. C. 11. Encroachments into Walk Street Right-of-Way.** *Encroachments into City right-of-way shall be limited to grade level uses including gardens, patios, landscaping, ground level decks and fences. The gardens/patios in the right-of-way, between the fences and the buildings, shall be permitted to provide a transitional zone between the public pathways and private dwellings. To create a defensible space, the planting along the walk streets shall not impede the view of walkways by the residents and the view of the gardens by the pedestrian. Creative use and arrangement of permeable paving materials shall be encouraged. Any fence, wall or hedge erected in the public right-of-way shall not exceed 42 inches in height as measured from the existing grade of the public right-of-way. The use of decorative fence patterns such as split rail, picket and rustic is encouraged. New fences shall be located in line with existing fences on the same side of the street.*

In this case, Paloma Avenue is a forty-foot wide public right-of-way (Exhibit #3). A ten-foot wide sidewalk provides public access down the center of the forty-foot wide public right-of-way. The single family and multi-family residences which front the walk street have been allowed to improve and privatize their respective frontage area of the right-of-way with small landscaped yards. Each yard encroaches about fifteen feet into the right-of-way. The City often requires that new development on the walk streets improve the fronting right-of-way areas in order to preserve the special character of the walk streets. The Commission routinely approves such encroachments. A minimum ten-foot wide public sidewalk, however, must be maintained to provide public access down the center of the walk street right-of-way. The lush landscaping along the walk streets provides a quiet and visually pleasing corridor for pedestrians to stroll through. Because the wall heights are limited to 42 inches, the full forty-foot width of the street remains visible to pedestrians, and pedestrians and activities on the walk streets are visible from the houses. This intervisibility makes the walk street a defensible and supervised public space. Public space in a dense urban area is unsafe if it is not visible and defensible.

The applicant's lot is the first lot on the Paloma Avenue walk street, and is therefore the entrance to the walk street as one leaves beach and boardwalk area (Exhibit #2). The project as proposed does not adequately protect the special character of the Paloma Avenue walk street and would interfere with public access and recreation. Although the proposed project will not directly obstruct the existing sidewalk or block the public's use of the sidewalk in the center of the right-of-way, it would negatively affect the public's experience and perception of the walk street by raising the elevation of the proposed wall over the heads of everyone. If

such a high wall was approved, the public's view to the shoreline would be blocked and a narrow and sterile canyon would be created along the coastal accessway (and within the public's right-of-way). The proposed project would directly interfere with the public's visual access and defensible space. Therefore, the proposed project is not consistent with the public access and recreation policies of the Coastal Act and is denied.

### C. Community Character

Section 30251 of the Coastal Act states:

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

Section 30253(5) of the Coastal Act states:

New development shall: (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

In order to protect public access, community character and visual quality in the North Venice neighborhood where the proposed project is situated, the Commission has consistently limited residential density and structural height and protected the character of the walk streets. On June 12, 2001, the Commission certified the Venice LUP which includes the following policies to protect the historic Venice walk streets and the character of the North Venice community. The following LUP policies carry out the requirements of Coastal Act Sections 30251 and 30253 to protect the scenic and visual qualities of the North Venice coastal area, a popular visitor destination.

- **Policy II. C. 7. Walk Streets.** *Designated walk streets shall be preserved and maintained at their present widths for public pedestrian access to the shoreline and other areas of interest and to preserve views along and from the public right-of-way. Vehicular access on walk streets shall be restricted to emergency vehicles. The minimum width of the pedestrian path shall be 10-12 feet in the North Venice and Peninsula areas and 4½ feet in the Milwood area. The remaining public right-of-way shall be limited to grade level uses including landscaping, patios, gardens and decks.*

- **Policy II. C. 10. Walk Streets -- Residential Development Standards.** *New residential development along walk streets shall enhance both public access and neighborhood character. Building materials, colors, massing and scale of new structures shall complement those of existing structures in the neighborhood. Building facades shall be varied and articulated to provide visual interest to*

*pedestrians. Primary ground floor residential building entrances and frequent windows shall face the walk streets. Front porches, bays, and balconies shall be encouraged. In case of duplexes and low density multiple-family buildings, entries shall be located in the exterior building facade for each residential unit, shall face walk streets, and be well-defined and separate.*

- **Policy II. C. 11. Encroachments into Walk Street Right-of-Way.** *Encroachments into City right-of-way shall be limited to grade level uses including gardens, patios, landscaping, ground level decks and fences. The gardens/patios in the right-of-way, between the fences and the buildings, shall be permitted to provide a transitional zone between the public path ways and private dwellings. To create a defensible space, the planting along the walk streets shall not impede the view of walkways by the residents and the view of the gardens by the pedestrian. Creative use and arrangement of permeable paving materials shall be encouraged. Any fence, wall or hedge erected in the public right-of-way shall not exceed 42 inches in height as measured from the existing grade of the public right-of-way. The use of decorative fence patterns such as split rail, picket and rustic is encouraged. New fences shall be located in line with existing fences on the same side of the street.*

The above-stated policies of the certified Venice LUP clearly prohibit the enclosure of the walk street rights-of-way with high walls or vegetation. Venice LUP Policy II.C.7 requires that, "Designated walk streets shall be preserved and maintained ... to preserve views along and from the public right-of-way". Venice LUP Policy II.C.10 states that, "residential development along walk streets shall enhance both public access and neighborhood character ... to provide visual interest to pedestrians". Venice LUP Policy II.C.11 requires that walk street walls not exceed 42 inches in height and that planting along the walk streets shall not impede the view of walkways by the residents and the view of the gardens by the pedestrian. The proposed project would violate all three of the above-stated policies of the certified Venice LUP as well as Sections 30251 and 30253 of the Coastal Act.

A public view of the shoreline exists from the Paloma Avenue walk street (Exhibit #6). The proposed 7.5-foot high wall would partially obstruct the public view of the shoreline from Paloma Avenue (Exhibit #6). The proposed 7.5-foot high wall would have a negative effect on community character and the special character of the walk streets themselves by obstructing public views of the public right-of-way. Policy II.C.11 of the Venice LUP states that the right-of-way area of the walk street between the fences and the buildings, into which residential yards are encouraged to encroach upon, is a transitional zone between the public path ways and private dwellings. While the public may be excluded from physically accessing the encroachment areas, the landscaped right-of-way still provides the public with a unique visual resource and a feeling of openness along the accessway. The proposed 7.5-foot high wall would eliminate any transitional zone from the public accessway and, if allowed on every encroachment, would result in an accessway lined with looming canyon-like sides.

Therefore, staff is recommending that the Commission deny the proposed project because it cannot be found to be consistent with Sections 30251 and 30253 of the Coastal Act, and it



would prejudice the ability of the City to prepare an LCP which conforms with Chapter 3 policies of the Coastal Act. The applicant's concerns about privacy and security may be better addressed with a wall built entirely on private property. The applicant's proposal to construct a 7.5-foot high wall on public property to protect his privacy cannot be found to be consistent with the policies of the Coastal Act that require the protection of public access, community character and visual quality in the North Venice neighborhood. Therefore, the proposed project is denied.

#### **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.

The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The Los Angeles City Council adopted a proposed Land Use Plan (LUP) for Venice on October 29, 1999. On November 29, 1999, the City submitted the draft Venice LUP for Commission certification. On November 14, 2000, the Commission approved the City of Los Angeles Land Use Plan (LUP) for Venice with suggested modifications. On March 28, 2001, the Los Angeles City Council accepted the Commission's suggested modifications and adopted the Venice LUP as it was approved by the Commission on November 14, 2000. The Venice LUP was officially certified by the Commission on June 12, 2001.

The certified Venice LUP contains provisions to protect coastal views and the character of the historic Venice walk streets, including a 42-inch height limit for walls in the right-of-way. The proposed project does not conform to the policies of the certified Venice LUP. Moreover, as discussed above, the proposed development is inconsistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the proposed development would prejudice the City's ability to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, and is not consistent with Section 30604(a) of the Coastal Act.

**E. California Environmental Quality Act (CEQA)**

Section 13096 Title 14 of the California Code of Regulations requires Commission approval of a coastal development permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

In this case, there exists a viable use on the private property: a single family residence. Construction of a shorter, 42-inch high wall constitutes a feasible alternative to the construction of the proposed 7.5-foot high wall. A 42-inch high wall would have less adverse environmental effects. Furthermore, the applicant may propose an alternative project that is located entirely on his property. The proposed structure exceeds the height limit, is not consistent with character of the historic Venice walk streets, and would significantly impact the views of the coast from Paloma Avenue. The denial of this project would reduce the project's visual impact from the Paloma Avenue walk street.

Therefore, there are feasible alternatives or mitigation measures available which will lessen the significant adverse impacts that the development would have on the environment. Therefore, the Commission finds that the proposed project is not consistent with CEQA and the policies of the Coastal Act.

**F. Unpermitted Development**

A 6.5-foot high wall currently exists on the site, enclosing the front yard and a 15'x 30' portion of the 40-foot wide Paloma Avenue public right-of-way (Exhibit #5). The existing single family residence was built in 1983 pursuant to the Commission's approval of Coastal Development Permit 5-82-447 (Sohn). The 6.5-foot wall that exists on the site was not approved by Coastal Development Permit 5-82-447 or any other Commission action. It is an unpermitted development.

Although development has taken place prior to Commission action on this coastal development permit, consideration of the application by the Commission is based solely upon Chapter 3 policies of the Coastal Act. Commission action on this permit application does not constitute a waiver of any legal action with regard to the alleged violation nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal development permit.

# VENICE, CA



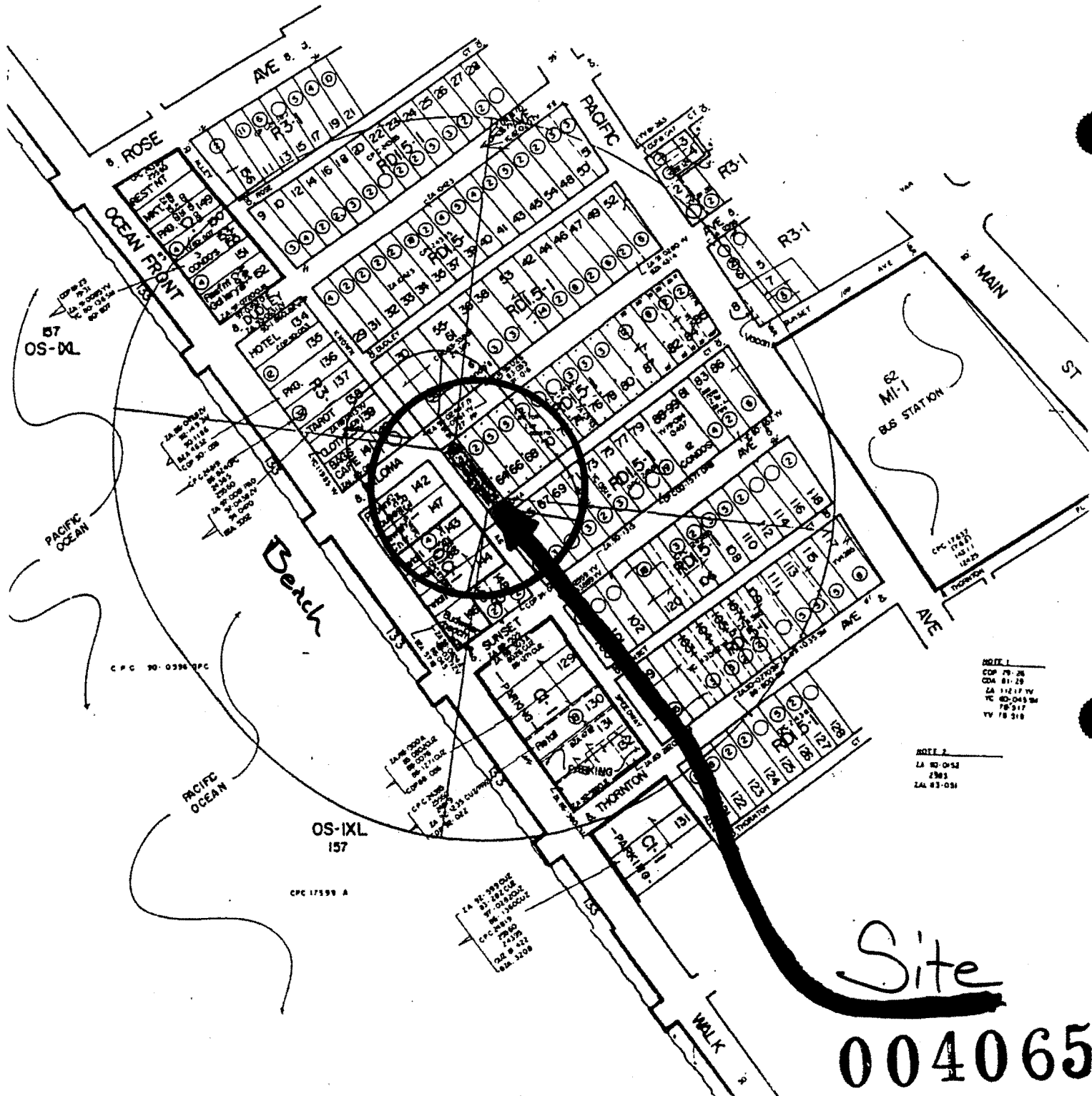
Site  
16 Paloma Av.

COASTAL COMMISSION

5-01-162

EXHIBIT # 1

PAGE 1 OF 1



Site  
**004065**

**COASTAL DEVELOPMENT PERMIT  
 EXCEPTION TO THE SPECIFIC PLAN**



Quality Mapping Service  
 Zoning Consultants

14549 Archwood St, Suite 301  
 Van Nuys, California 91405  
 Phone (818) 987-7949 - Fax (818) 987-0351

DRAWN BY: CIAZ

**THOMAS BROTHERS**

Page: 671 Grid: 05 CD: 6

LEGAL C.T.: 2

LOT: 1 BLK. 5 PA.: 3

TRACT: GOLDEN BAY TRACT  
 M.B. 2-15 USES:

CONTACT: NEAPTIDE INVESTMENT

DATE: 8-31-00

**COASTAL COMMISSION**

**5-01-162**

EXHIBIT # 2

PAGE 1 OF 1

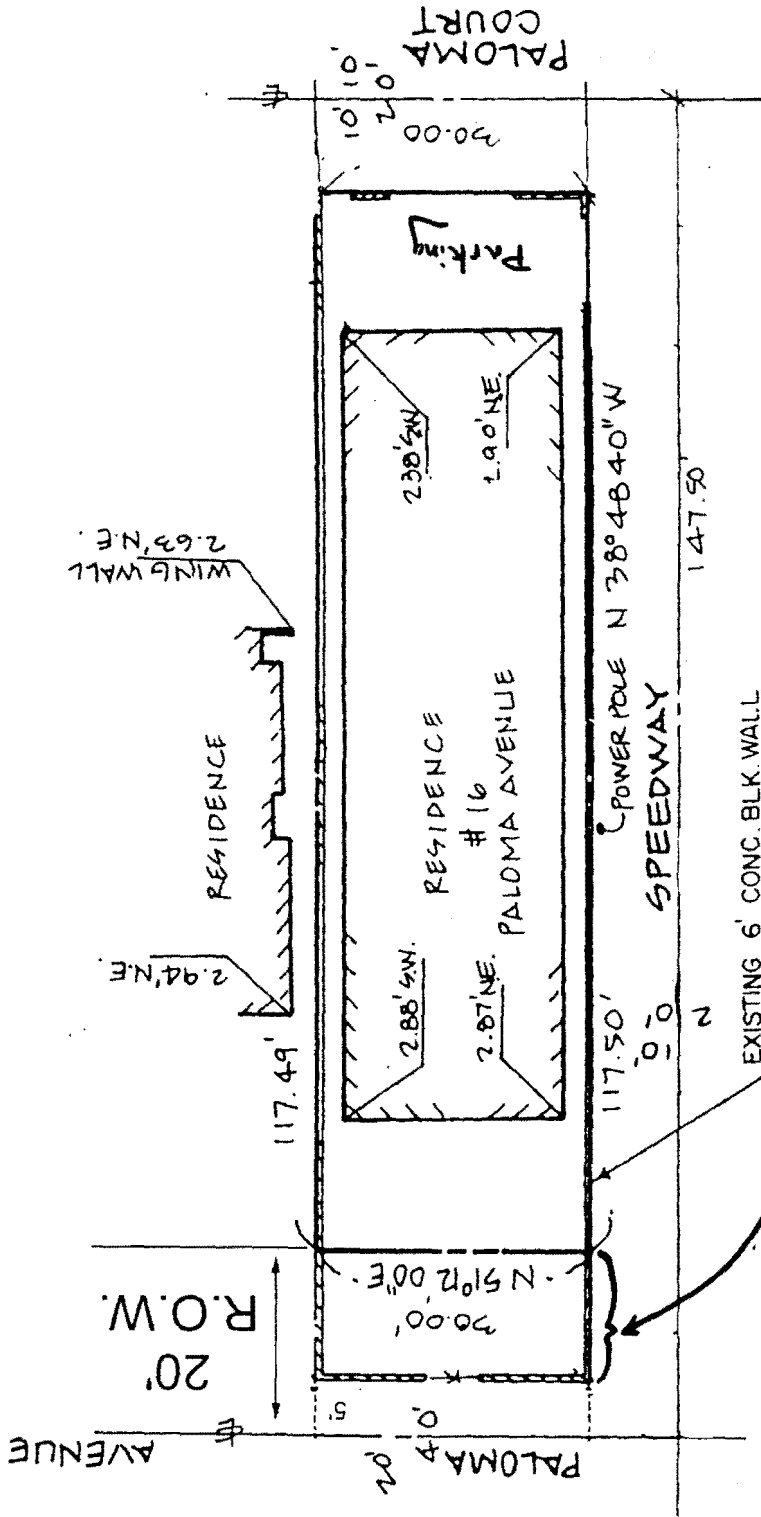


00-272  
 QMS

E-3



SCALE 1"=20'



Proposed 7 1/2' wall in Public right-of-way (3 sides).

COASTAL COMMISSION

5-01-162

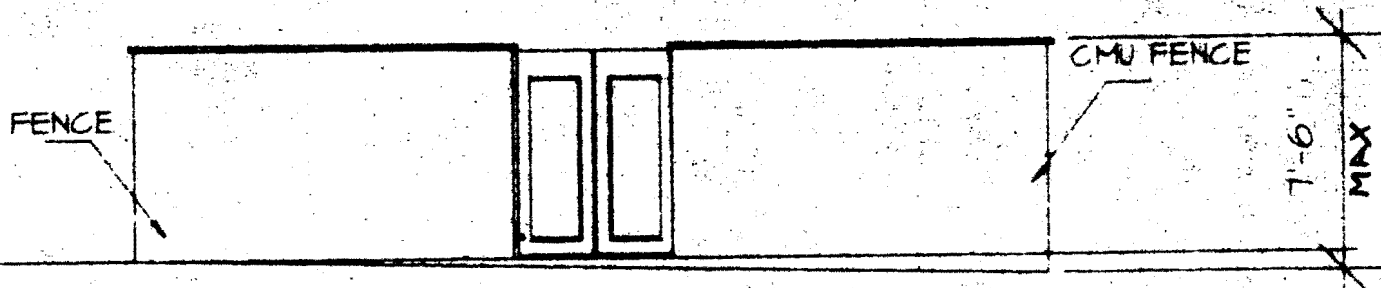
EXHIBIT # 3

PAGE 1 OF 1

### CONDITIONS OF APPROVAL (LACity)

**Entitlement:**

1. The wall shall be permitted along the perimeter of the site as shown in exhibit E-3.
2. The height of the wall shall not exceed 7-foot 6 inches as defined by the Department of Building and Safety.
3. The wall shall be constructed from masonry blocks with a gate access located along Paloma Street (walkstreet).
4. The portion of the wall fronting Paloma Street shall have a creeping vine planted on its facade.
5. Landscaping along Paloma Street shall included an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect.
6. The applicant shall obtain a revocable permit from the Department of Public Works as required by the Venice Specific Plan, to permit the wall/fence in the public right-of-way.



FRONT VIEW - PALOMA AVENUE  
SCALE:

COASTAL COMMISSION

5-01-162

EXHIBIT # 4

PAGE 1 OF 1

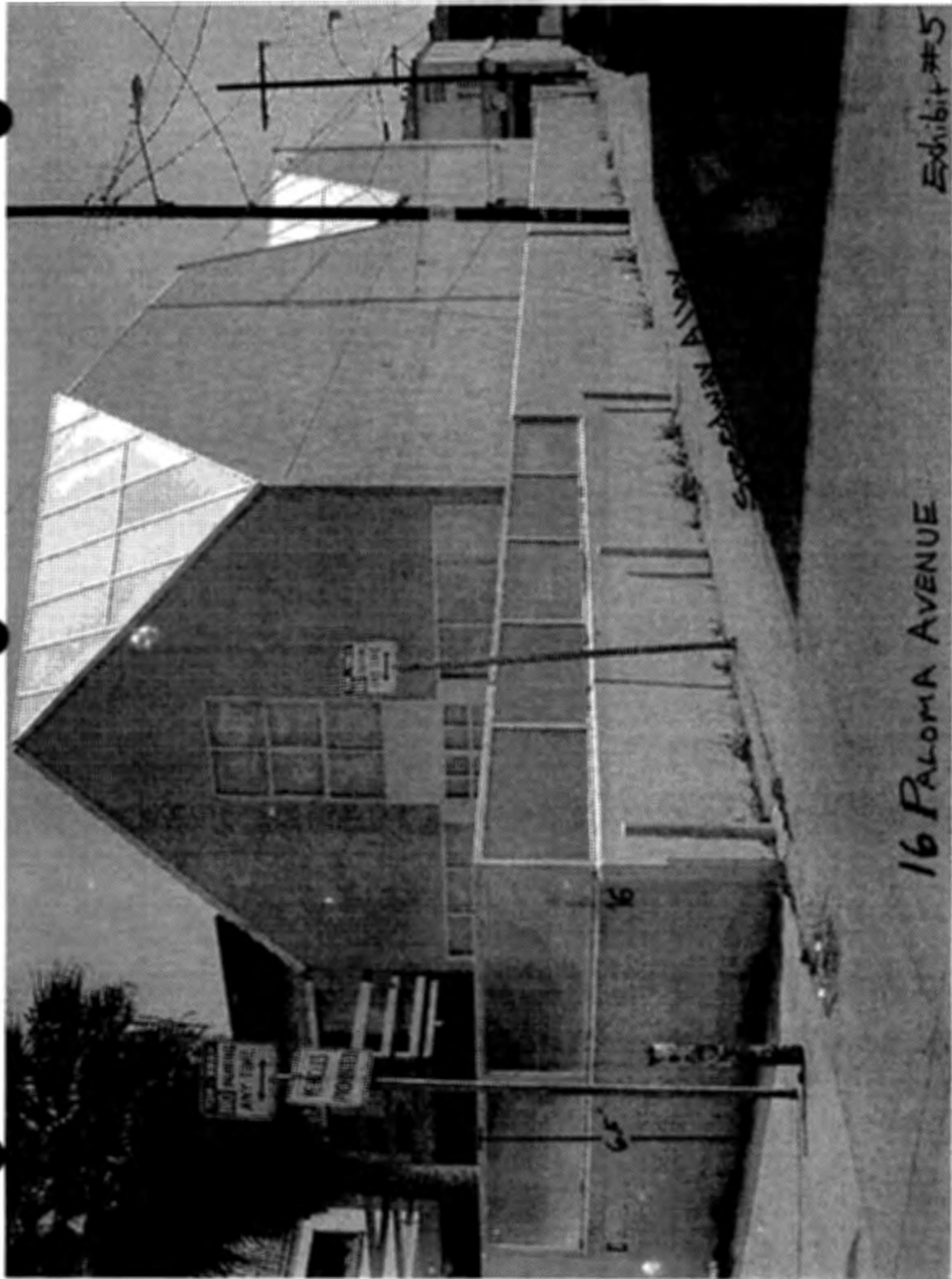


Exhibit #5

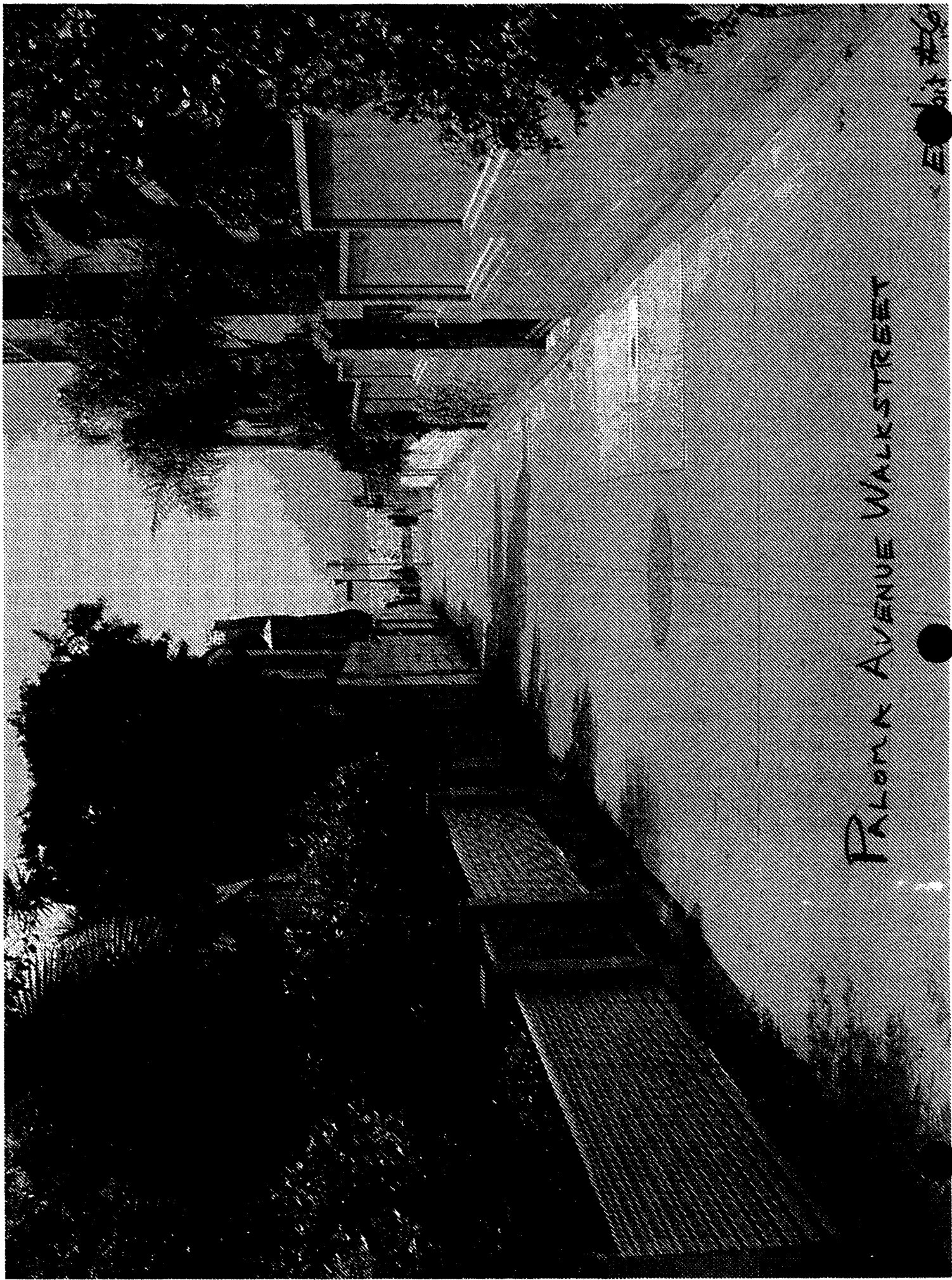
16 PALOMA AVENUE

16

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PALOMN AVENUE WALK STREET

EM 11 13