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CALIFORNIA COASTAL COMMISSION
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071

RECORD PACKET COPY

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Commission Action:	

Item Tu 15i

STAFF REPORT: REGULAR CALENDAR

APPLICATION NUMBER: 5-00-396

APPLICANT: Beach Lofts, L.L.C., Attn: Richard Ehrman

PROJECT LOCATION: 25 Brooks Avenue, Venice, City & County of Los Angeles

PROJECT DESCRIPTION: Construction of a three-floor (including semi-subterranean first floor), 35-foot high, 6,806 square foot four-unit condominium with four two-car garages and four unenclosed guest parking spaces, on a 7,178 square foot RD1.5-1 zoned lot.

Lot Area	7,178 square feet
Building Coverage	4,450 square feet
Pavement Coverage	1,420 square feet
Landscape Coverage	1,308 square feet
Parking Spaces	12
Zoning	RD1.5-1
Plan Designation	Multiple Family Residential
Ht above final grade	35 feet

LOCAL APPROVAL: Local Coastal Development Permit 1999-3112
Project Permit 1999-3111

SUBSTANTIVE FILE DOCUMENTS:

1. Venice Land Use Plan certified with Suggested Modifications November 14, 2000.

2. "Notice of Permit Issuance" for Coastal Development Permit No. 1999-3112 dated November 15, 2000.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending **APPROVAL** of the proposed project subject to special conditions relating to compliance, residential density, building height, roof access structures, parking and preservation of pedestrian scale. The two primary issues of this application are (1) the preservation of the pedestrian scale consistent with neighboring buildings on small lots, and (2) the ability to uphold the standards of the certified Venice Land Use Plan (LUP) in order to not prejudice the City's ability to prepare an LCP that conforms to the Chapter 3 policies of the Coastal Act. The applicant objects to the recommended changes to the building façade to incorporate a front door, arguing that the policies of the LUP were adopted after he had designed the condominium and that he was not informed about any possible changes in standards during the City's review of the project. City officials indicate that they did inform the applicant that the LUP was under review and may result in changes.

The project site is located within the ***"Dual Permit Area"*** of the City of Los Angeles coastal zone. Pursuant to Sections 30600 and 30601 of the Coastal Act, any project approved by the City in the dual permit area pursuant to a local coastal development permit will be appealable to the Commission and will also require a coastal development permit or permit amendment from the Coastal Commission. The City of Los Angeles has established procedures for filing, processing, reviewing, modifying, approving, or denying a coastal development permit, as permitted in Section 30600(b). For Venice, the City determines project consistency with the Venice Specific Plan prior to issuing the local coastal development permit.

STAFF RECOMMENDATION OF APPROVAL:

The staff recommends that the Commission **APPROVE** the following resolution with special conditions.

Motion:

I move that the Commission approve Coastal Development Permit No. 5-00-396 pursuant to the staff recommendation.

Staff Recommends a **YES** vote. Passage of this motion will result in adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

I. APPROVAL WITH CONDITIONS

The Commission hereby approves, subject to the conditions below, a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the

policies of Chapter 3 of the Coastal Act and 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. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

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. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. 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.

5. 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. **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.

2. **Residential Density**

The permitted use of the approved structure is limited to four residential units. Any change in density, number of units, or change in use shall be submitted to the Executive Director to determine whether an amendment to this permit is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations.

3. **Building Height**

No portion of the stepped back roofline of the proposed structure shall exceed 35 feet in elevation as measured from the centerline of the frontage road (Brooks Avenue). No portion of the roof access structures shall exceed 38 feet in elevation (8 feet in excess of the flat roof height of 30 feet) as measured from the centerline of the frontage road.

4. **Roof Access Structures**

The front (nearest Brooks Avenue) roof access structure must be setback a minimum of 20 feet from the front edge of the structure, as proposed. The four roof access structures shall be identical to each other in size, design and orientation, as proposed. Three of the four roof access structures shall be set behind the front facing roof access structure, as proposed, so as to reduce their visibility from pedestrians on the walkways and motorists on Brooks Avenue.

5. **Parking**

A minimum of nine parking spaces (two spaces for each dwelling unit plus one guest parking space) shall be provided and maintained on the site to serve the approved multiple family residence. Three parking spaces, in addition to the nine required to meet the needs of residents, shall be provided on the property, which is located in the Beach Impact Zone (BIZ), as required by the Venice Specific Plan Ordinance No. 172,897.

6. **Preservation of Pedestrian Scale**

Prior to issuance of the coastal development permit, the applicant shall submit for the review and approval of the Executive Director revised project plans that incorporate the following: a) the building façade on Brooks Avenue shall be varied and articulated to a pedestrian scale using frequent windows, a well-defined street level entrance to the front residential unit, a minimum of one porch, bay and/or balcony in order to provide visual interest to pedestrians, b) the front and side yards shall remain open to pedestrian view and shall be improved with grade level landscaping in order to provide an area for on-site percolation and to provide visual interest to pedestrians; and c) the retaining walls, guardrail,

planters/fill, east corner stairway, 7-foot high galvanized steel gates and fence in the east side-yard shall be removed from the project plans to provide a continuous yard at the same grade level as neighboring yards. The addition of a property line fence not to exceed 42 inches in height is permitted in the front yard. The revised project plans shall conform to the requirements of the City of Los Angeles Specific Plan for Venice and the certified Venice LUP. The applicant shall construct and maintain the project as shown on the plans approved by the Executive Director.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. Project Description and Background

The subject site is located at 25 Brooks Avenue, Venice in the City and County of Los Angeles (Exhibits #1; #6, Photo 4). The subject property consists of two contiguous rectangular lots having a combined frontage of 60 feet on the north side of Brooks Avenue and a uniform depth of 120 feet (Exhibit #2). The property is vacant and has level topography. The site is located approximately one block inland of Venice Beach on Brooks Avenue, which is perpendicular to the beach, in the Coastal Zone (Exhibit #3).

The applicant is proposing construction of a three-floor (including semi-subterranean first floor), 35-foot high four-unit condominium (Exhibit #4, pp.1-12). Each unit will have approximately 1,700 square feet of living space and a two-car garage located in the semi-subterranean first floor, with vehicular access from Park Court (Exhibit #4, p.2). The project includes a stepped back roofline consisting of a 30-foot high flat roof with an angled clerestory roof that exceeds the flat roof height by 5 feet at the western side and 3 feet at the eastern side of the clerestory (Exhibit #4, p.9). Residents will have access to the roof via enclosed stairways from each unit, each of which will project 8 feet above the flat roof (Exhibit #4, p.11). The applicant proposes to construct the four-unit condominium on two contiguous lots (Exhibit #2), which have a combined area of 7,178 square feet, in an RD1.5-1 (Residential Density Multiple Dwelling Zone) zoned area. No encroachment into City property is proposed.

The Commission has recognized in both prior permit and appeal decisions that the North Venice subarea, where the proposed project is located, is a special coastal neighborhood. Prior to 1980, several building standards, which applied primarily to density, height and parking, were routinely imposed on coastal development permits in the North Venice subarea in order to protect public access and community character. In 1980, the Commission put a set of building standards for the North Venice subarea into legislation as part of the Regional Interpretive Guidelines for Los Angeles County. The guidelines provided developers with advanced notification of the frequently

applied standards. The guidelines were for informational purposes only and the Commission has analyzed each project in terms of its effects on community character, scale and public access.

On November 14, 2000, the Coastal Commission certified a Land Use Plan (LUP) for Venice as part of the current effort to develop a certified Local Coastal Program (LCP) for the Venice area. In its approval, the Commission required changes to the LUP's residential land use and development standards, which provide guidance in determining developments' compliance with the Chapter 3 policies of the Coastal Act. The revised standards of the LUP require that all buildings involving lot consolidations have varied and articulated building facades that provide a pedestrian scale that results in consistency with neighboring structures on small lots. The revised standards apply to this project, which includes consolidation of two lots in North Venice.

Special conditions are imposed on coastal development permits to ensure that the projects are consistent with the Coastal Act. In order to mitigate the identified impacts, the appropriate special conditions have also been applied to this coastal development permit.

The project as proposed does not relate visually to the street and does not provide a pedestrian scale. The proposed building façade includes two stories plus a clerestory above a 3 foot 8 inch to 5 foot 6 inch high basement/garage wall facing Brooks Avenue. Thus, the ground floor is elevated 3 feet 8 inches to 5 feet 6 inches above natural grade. The 3 foot 8 inch high wall is proposed to extend to and along the property line of the east side-yard. The east side-yard is separated from the front yard by a seven-foot high gate and fence. This 3 foot 8 inch high retaining wall would support fill for landscaping and a walkway at the (elevated) grade of the ground floor. Adjoining the basement/garage wall on the west would be a 3 foot 6 inch high concrete retaining wall that would extend to and along the western property line and support fill for landscaping the side-yard. The neighboring side and front yards are at grade. Grade level landscaping is proposed for the front yard, but the side-yard landscaping is elevated atop fill and, on the eastern side of the property, is shielded from view by a 7-foot high galvanized steel gate and fence. The residents would gain access to the four units via individual stairways from the semi-subterranean parking garage into each unit or via a narrow walkway in the elevated east side-yard. The side walkway would be accessible through gates at the front and back of the property. There is habitable space on the ground floor level and four windows facing Brooks Avenue, however, there is not a ground level entrance fronting the street into the first unit, nor are there other features that relate to the street, such as front porches, bays and balconies. Additionally, the side-yard landscaping is not at street level and is shielded from pedestrian view on the east side of the property.

On December 19, 2000, staff requested that the applicant consider changes in the project to provide a pedestrian scale as required by the LUP certified on November 14, 2000. The applicant contends that this project should not be subject to the new

requirements, which were added to the LUP as a condition of approval after the Coastal Development Permit application for this project was received in the South Coast Area Office. He contends that this project should not be subject to the new requirements because he claims that he was not informed of them prior to or during City review and approval of the project. City officials contend that they informed him of potential changes to the LUP. The applicant did, however, make the following changes to the front of the proposed structure:

(1) Increased the size of the middle window by extending it closer to the ground floor, and added mullion (a vertical strip, bar or pier dividing the panes of a window) (Exhibit #4, p.6),
(2) Added larger overhangs above the windows to increase depth and break up the façade,
(3) Provided landscape plans to landscape the front yard area (with the exception of the areas of the proposed stair enclosure at the western side of the property and the unenclosed stairway at the eastern corner of the property) (Exhibit #4, p.12); and
(4) Introduced horizontal siding to break up the massing of the building façade.

The applicant states that it is too late to change the orientation of the building, which has west-facing windows oriented to the side-yard and individual residential units oriented to the east side-yard walkway. The applicant contends that expensive changes would be needed to change the orientation of the front unit in order to add a ground level entrance facing Brooks Avenue. He contends that having a door facing the street and removing the retaining walls, fill, gate and fence from the project would lower the level of security currently proposed. He further contends that the fill is needed in the side-yards to support a walkway that is level with the ground floor entrances to each unit and to provide soil for landscaping.

B. Land Resources

Section 30244 of the Coastal Act states:

> *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Officer, reasonable mitigation measures shall be required.*

The project is in an area that is likely to yield unrecorded archaeological sites. The mitigated Negative Declaration that was prepared for this project contains measures to mitigate the potential impacts to archaeological sites to a level of insignificance. The measures require that the project is halted and the services of an archaeologist are secured if any archaeological materials are encountered during the course of the project development. If that were the case, copies of any archaeological survey, study or report would be submitted to the UCLA Archaeological Information Center

and a covenant and agreement would be recorded prior to obtaining a grading permit. The Commission finds that the mitigation measures are consistent with the requirement of Section 30244 of the Coastal Act.

C. Development

Section 30250 of the Coastal Act states, in part:

> *(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it...*

According to the Venice LUP, "New residential development is linked to the availability of public services and infrastructure, and in addition to traffic consideration, environmental and coastal access concerns as required by the Coastal Act." The subject property is in a highly developed area having single and multiple family residential dwellings. There are many commercial, recreational and visitor-serving facilities, including restaurants and shops along Ocean Front Walk and Main Street, within walking distance. Local streets, walk streets, pedestrian walkways and paths, and bikeways provide access to the local shoreline by car and by foot. The property is approximately 1 mile from Lincoln Boulevard (State Highway No. 1), and is within close proximity to three major freeways and public transit systems, which provide access to additional commercial and other uses. The Commission finds that the proposed project is consistent with Section 30250 of the Coastal Act, which requires, "New residential... development... shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it..."

D. Community Character/Visual Quality

Section 30251 of the Coastal Act states, in part:

> *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 of the Coastal Act states, in part, that new development shall:

> *(5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreation uses.*

The following information relating to the uniqueness of Venice is from the certified LUP.

> "Venice remains the quintessential coastal village where people of all social and economic levels are able to live in what is still, by Southern California standards, considered to be affordable housing. Diversity of lifestyle, income and culture typifies the Venice community. United by the term Venetians with all its connotative meanings, Venice is really a group of identifiable neighborhoods with unique planning and coastal issues."
>
> "As a result of prior development and changes in land use, there has emerged a blend of residential uses of various intensities, commercial uses and some minor industrial uses. Housing is located in single-family homes, multi-family dwellings, and mixed-use structures including live/work artist studios."

In order to protect public access, community character and visual quality in the North Venice subarea, the Commission has consistently limited residential density and structural height. Local density ranges from 1 to 30 dwelling units per acre. The Commission has also protected the unique character of the Venice community by supporting the community's efforts to preserve the nature and character of existing neighborhoods and provide a pedestrian scale consistent with neighboring structures on small lots.

The subject property is located in the North Venice subarea (Exhibit #5) of the Venice Coastal Zone, which includes the area within the Venice community planning area west of Lincoln Boulevard (Exhibit #3). The property includes lots 6 and 8 on Block 8 of the Golden Bay Tract (Exhibit #2). The LUP land use designation is Multiple Family Residential of Low Medium II density and the City zoning designation is RD1.5-1, Restricted Density Multiple Dwelling Residential. The four-unit condominium complies with the density standards set forth in the LUP. Since the LUP allows a maximum density of two units on lots smaller than 4,000 square feet and each lot is approximately 3,589 square feet, the proposed four units on two contiguous lots totaling 7,178 square feet is consistent with the allowed density.

Pursuant to Chapter 3 of the Coastal Act, it is a policy of the Venice LUP to protect Venice's unique social and architectural diversity as a Special Coastal Community. New development shall respect the scale and character of the community development. Buildings which are of a scale compatible with the community with respect to bulk, height, buffer and setback shall be encouraged. The bulk of the building in terms of width, height and length is consistent with others on consolidated lots. The property is not located on a walk street and the project has been conditioned to comply with the 35-foot height limit for buildings with stepped back rooflines. The proposed two-story building is consistent with the height of neighboring buildings, which consist of two and three-story multiple family residential

dwellings (Exhibit #6, Photos 1-15). The height and length are also consistent with other buildings on individual small lots. The width, however, is approximately twice that of neighboring buildings on individual small lots.

In its certification of the Venice LUP, the Commission required changes to the LUP's residential land use and development standards. According to the LUP, no more than two lots may be consolidated in the North Venice neighborhood. The following excerpt regarding lot consolidations was added to facilitate approval of the LUP.

> *Lot consolidations may be permitted only subject to the following limitations:*
>
> *i. No building or structure shall be constructed on what were more than two contiguous lots prior to lot consolidation with the exception of subterranean development that is entirely below street elevation.*
> ii. *Building facades shall be varied and articulated to provide a pedestrian scale which results in consistency with neighboring structures on small lots. Such buildings shall provide habitable space on the ground floor, a ground level entrance and landscaping and windows fronting the street. No increase in the number of units shall result from the lot consolidation.*
> iii. *Front porches, bays and balconies shall be provided to maximize architectural variety.*

The revised standards require that no more than two lots may be consolidated in the North Venice neighborhood and that developments on consolidated lots maintain pedestrian scale, including visual and physical links to the pedestrian network, which consists of the sidewalks on the streets and nearby walk streets. In order to maintain a pedestrian friendly design and visual quality consistent with the existing (residential) character of the community, the recently certified LUP requires that buildings on consolidated lots provide varied and articulated facades that result in consistency with neighboring structures on small lots. Although the applicant contends that he was uninformed of this requirement, the City of Los Angeles contends that the applicant was warned that the project may become subject to new land use and development standards due to then proposed revisions to the LUP. Additionally, the Commission has consistently required the provision of doorways and windows on the building facades of neighboring small and consolidated lots to provide a pedestrian scale and visual interest to pedestrians. Blank walls have been prohibited.

Most of the higher density structures in this neighborhood, as well as the single family residences, have a landscaped front yard, a front door and windows facing the fronting street (Exhibit #6, Photos 5-7, 10, 13-14). The public consistently testifies that the neighborhood is "low density." This seems derived from several facts. For instance, most buildings do not extend over more than one lot; and most buildings

have a door and yard configuration consistent with that of a single family residence (Exhibit #6, Photos 5-7, 13-14), even though there is usually more than one unit developed on the site. The suggested modifications of the certified LUP calls specifically for varied building facades, requiring primary ground floor residential building entrances and frequent windows and landscaping facing the fronting streets for buildings on consolidated lots.

Section 30251 of the Coastal Act requires that the scenic and visual qualities of coastal areas shall be considered and protected. Additionally, Section 30253 of the Coastal Act requires that new development shall protect the unique character of special communities. The Commission must determine whether the proposed project conforms to the visual resource policies contained in Sections 30251 and 30253 of the Coastal Act. In addition, Section 30604(a) of the Coastal Act requires the Commission to ensure that the approval of the proposed project will not prejudice the ability of the City to prepare an LCP that conforms to Chapter 3 policies of the Coastal Act.

The question is whether or not the Commission will enforce the certified LUP's new requirement to provide varied building facades that are articulated to provide a pedestrian scale consistent with the neighboring structures. Commission approval of a development that does not conform to the certified Venice LUP could prejudice the ability of the City to prepare an LCP that conforms to Chapter 3 policies of the Coastal Act. Therefore, staff recommends that the proposed development conform to the standards of the certified LUP including the required varied and pedestrian scale building facades for development on consolidated lots. The requirement of the certified Venice LUP to provide a pedestrian scale for development on consolidated lots carries out the requirement of Section 30251 of the Coastal Act to protect the scenic and visual qualities of consolidated lots by limiting the scale of the development. A pedestrian scale is one that assures interconnection between the structure (and its occupants) and the pedestrian through semipublic spaces, such as front yards, and through windows and doorways which allow residents to view (and monitor) the streets, sidewalks, pedestrians and nearby structures. The requirement to provide a pedestrian scale through provision of varied and articulated building facades will protect community character, as required by Section 30253 of the Coastal Act, by preventing the construction of buildings with blank facades on consolidated lots. The requirement to provide a pedestrian scale will permit a multiple family residential building with habitable space on the ground floor, a ground level entrance, landscaping and windows fronting the street and front porches, bays or balconies.

In order to ensure that the proposed project preserves the unique character and pedestrian scale of the lots in North Venice, the approval of the permit is conditioned to require revised plans that incorporate the following: a) the building façade on Brooks Avenue shall be varied and articulated to a pedestrian scale using frequent windows, a well-defined street level entrance to the front residential unit, a minimum

of one porch, bay and/or balcony in order to provide visual interest to pedestrians, b) the front and side yards shall remain open to pedestrian view and shall be improved with grade level landscaping in order to provide an area for on-site percolation and to provide visual interest to pedestrians; and c) the retaining walls, guardrail, planters/fill, east corner stairway, galvanized steel gates (at the front and back of the east side-yard) and fence shall be removed from the project plans to provide a continuous yard at the same grade level as neighboring yards.

The original proposal included four windows facing Brooks Avenue. After staff informed the applicant of the LUP land use and development standards for consolidated lots, the plans were revised such that the heights of two of the front windows were increased (Exhibit #4, p. 6). The current proposal for the four windows meets the LUP requirement of frequent windows. The other standards of the LUP are not met in the current project proposal. The project has been conditioned to meet those standards. Since the special conditions require submittal of revised plans consistent with the standards, the project has been conditioned to retain a minimum of four windows as currently proposed in order to maintain consistency with the LUP requirement of frequent front windows.

The current proposal does not include a well-defined street level entrance to the front residential unit. Instead, the applicant proposes to build an unenclosed stairway rising four feet from natural grade to meet the level of proposed fill on the east side-yard, which is gated in the front with a seven foot high galvanized steel gate and fence (Exhibit #4, p.6). The steel gate is not at street level and does not provide direct entry into any of the residential units. The steel gate would provide access to the east side-yard and subsequent entry into each of the four units through doors facing the side-yard. A second galvanized steel gate is proposed at the back of the east side-yard for entry from Park Court. The project has been conditioned to provide a well-defined street level entrance into the front residential unit.

The current proposal does not include porches, bays or balconies fronting Brooks Avenue. The proposal includes one 70 square foot porch per residential unit on the top floor along the west side of the building (Exhibit #4, p.7). The front wall (5 foot wide by 3 foot high) of the front-unit porch, would be visible from Brooks Avenue (Exhibit #4, p.6). The porch, however, is oriented to the west side of the property and would not provide interaction between the residents and the neighborhood, nor would it provide visual interest to pedestrians. The majority of the front-unit porch (14 feet long) faces the residential building west of the property. The project has been conditioned to add a minimum of one porch, bay or balcony to the façade of the front residential unit.

The project includes a reduced front yard setback ranging from 5 feet 3 inches to 6 feet 3 inches, rather than the minimum 15 feet required by Section 12.09.1 of the City of Los Angeles Planning and Zoning Code (Exhibit #7). (Staff has no evidence that the applicant applied to the City for a variance for this setback.) By having a

reduced front yard setback there is less area for landscaping. The front yard landscape plans include grade level landscaping with dense Sheep Fescue (*Festuca ovina glauca*) and numerous bunches of Deer Grass (*Muhlenbergia rigens*), as well as two Cordyline (*Cordyline australis*) in front of the proposed building (Exhibit #8). Two areas of the front yard would not be landscaped due to proposals to have a stair enclosure at the western end and an unenclosed stairway ascending to the gate at the eastern corner.

The side-yards are above grade on fill that is supported by concrete retaining walls along the western and eastern property lines and perpendicular to the multi-family residence at the front and back of the structure. The end of the western retaining wall closest to Brooks Avenue would be 3 feet 6 inches high. (Note: The applicant informed staff of a correction to the plans, stating that the western retaining wall would be 3 feet 6 inches high, rather than 5 feet 6 inches high, as currently drawn on the plans (Exhibit #4, p.6)). The landscape plans include planting of 25 Oldham Bamboo (*Bambusa oldhamii*) in the west side-yard on fill at the height of the retaining wall. The end of the eastern retaining wall closest to Brooks Avenue would be 3 feet 8 inches high, have a concrete stairway leading up to it, a 3 foot 6 inch high guard rail above it, and a 7 foot high galvanized steel gate and fence set back 4 feet from the top of it. The retaining wall and gate/fence would have a combined height of 10 feet 8 inches (Exhibit #4, p.6). The landscape plans include planting of 24 Oldham Bamboo plus Big Blue Lily Turf (*Liriope muscari*) throughout the east side-yard in fill at the height of the retaining wall.

The project is conditioned such that the side-yard landscaping is planted and maintained at grade level. The condition requires the maintenance of a landscaped view corridor through the side-yards. This must be achieved by the applicant submitting and using revised plans that remove the retaining walls, guardrail, planters, east corner stairway, galvanized steel gates (at the front and back of the east side-yard) and fence. The condition requires planting of the vegetation in the locations proposed, but directly in the ground rather than in fill. Maintaining grade level landscaping in the side-yards, as well as in the front yard (with the exception of the stair enclosure at the western end of the front yard), would provide a continuously landscaped yard at the same grade level as neighboring yards. By having a continuous yard at the same grade level as neighboring yards, the distance between the subject building and the two neighboring buildings would appear greater than if there were planters and retaining walls between them. Maintaining landscaped space between the subject building and the two neighboring buildings, would provide more of a residential scale than the proposed 2 foot 6 inch to 10 foot 8 inch high barriers facing Brooks Avenue.

The revised project plans shall conform to the requirements of the City of Los Angeles Specific Plan for Venice and the land use and development standards set forth in the Venice LUP. The Commission finds that the proposed project, only as conditioned to

preserve the scale and character of North Venice residential lots, is consistent with the provisions of Section 30251 of the Coastal Act.

Building height and bulk can also affect the scenic and visual qualities of consolidated lots, neighboring small lots and coastal areas. In previous approvals, the Commission and the City have both consistently limited new developments in the North Venice subarea to a height of 30 feet measured above the fronting right-of-way. The 30-foot height limit for North Venice is the standard of the Commission's Interpretive Guidelines and the City of Los Angeles Interim Control Ordinance (ICO) for Venice. The Commission and the City have, however, allowed portions of some structures to exceed the thirty-foot height limit by up to ten feet if the scenic and visual qualities of the area are not negatively impacted.

The recently certified Venice LUP also limits the height of new development in the North Venice subarea. For North Venice, the certified Venice LUP limits flat-roofed residential projects to 30 feet and stepped back rooflines to 35 feet in height. The project has a 35-foot high stepped back roofline, consisting of a 30-foot high flat roof and a 5-foot clerestory roof. The project, as conditioned to limit the height of the stepped back roofline to 35 feet, is compatible with the height of the surrounding buildings and the requirement of the Venice LUP.

The applicant also proposes to build an enclosed stairway (roof access structure) for each of the four units. Roof access structures may exceed the otherwise allowable height limit only as specified in the LUP. According to the LUP:

> *Residential structures may have an enclosed stairway (roof access structure) to provide access to the roof provided that:*
>
> *i. The roof access structure shall not exceed the specified flat roof height limit by more than 10 feet;*
> *ii. The roof access structure shall be designed and oriented so as to reduce its visibility from adjacent public walkways and recreation areas;*
> *iii. The area within the outside walls of the roof access structure shall be minimized and shall not exceed 100 square feet in area as measured from the outside walls.*
> *iv. All roof access structures shall be set back at least 60 horizontal feet from the mean high tide line of Ballona Lagoon, Venice Canals, Grand Canal and the inland side of the Esplanade (City right-of-way).*

The applicant proposes to build four enclosed stairways, which exceed the 30-foot flat roof height limit by 8 feet (and the 35-foot stepped back roofline height limit by 3 feet). The proposed roof access structures are parallel to Brooks Avenue, with the 17-foot length facing the street and the 5-foot width facing the neighboring lots. For this

project, it is not feasible to have the roof access structures parallel to the neighboring lots, such that only the 5-foot width would be seen from Brooks Avenue. The front facing roof access structure is set back 20 feet from the front of the proposed building. This setback meets the requirement of the Venice LUP to set back any portion of a structure that exceeds 30 feet in height one foot for every foot in height above 30 feet. The other three roof access structures are identical in size and design to the first and are oriented directly behind the front-facing structure at approximately 20-foot intervals. The sides of the roof access structures will also be shielded from view from the public beach by the neighboring buildings. Each roof access structure has an 85-square foot area plus a flat roof that extends horizontally to the chimney four feet in front of the structure's doorway (Exhibit #4, pp.6, 9).

The LUP is used for guidance, in this case, to determine if the roof access structures are consistent with the Coastal Act policies. The height and area of the roof access structures are compatible with the restrictions named in the LUP and do not create significant additional bulk above the height limit. Although the 17-foot length, rather than the 5-foot width of the roof access structures are facing Brooks Avenue, the structures could not be reoriented without major changes to the design and circulation of the structure. The Commission finds, therefore, that the roof access structures as proposed and conditioned to be set back at minimum 20-foot intervals are consistent with the Chapter 3 policies of the Coastal Act and do not prejudice the ability of the City to prepare an LCP that conforms to those policies.

E. PUBLIC ACCESS/PARKING

The project is located approximately one block inland of Venice Beach, which is a publicly owned sandy beach that provides direct access to the entire oceanfront shoreline, and is a shoreline resource in the Venice Coastal Zone. The Commission has consistently found that a direct relationship exists between residential density, the provision of adequate parking, and the availability of public access to the coast. Section 30252 requires that new development should maintain and enhance public access to the coast by providing adequate parking facilities.

Section 30252 of the Coastal Act states, in part:

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

Many of the older developments in the North Venice subarea do not provide adequate on-site parking. As a result, there is a parking shortage in the area and public access has been negatively impacted. The small amount of parking area that may be available for the general public on the surrounding streets is being used by guests and residents of the area.

To mitigate this problem, the Commission has consistently conditioned new development within the North Venice subarea to provide two parking spaces per residential unit plus a minimum of one guest parking space for each four units. All residential parking must be provided on the site. Private parking areas are not permitted on public rights-of-way.
The applicant proposes to provide twelve on-site parking spaces, eight spaces within a semi-subterranean basement having four two-car garages, and four unenclosed spaces at the northern end of the lot (Exhibit #4, p.2). Vehicular access to the parking areas is proposed from Park Court (Exhibit #4, p.1). The twelve proposed on-site parking spaces provide an adequate parking supply for the residents of the proposed four-unit condominium and exceed the residential parking requirements of the LUP by three spaces. Therefore, the proposed project conforms to the Commission's residential parking standards for the North Venice subarea.

In addition to meeting the residential parking requirements, the proposed project meets the parking requirements for the Beach Impact Zone (BIZ) in which it is located. The Venice Specific Plan Ordinance No. 172,897 identifies the BIZ and requires that any new multiple-family residential development projects within the BIZ provide additional parking spaces for public use or pay in-lieu fees into the Venice Coastal Parking Impact Trust Fund. The requirement of this City ordinance has been incorporated into the certified Venice LUP. Section 30604(a) of the Coastal Act requires the Commission to ensure that the approval of the proposed project will not prejudice the ability of the City to prepare an LCP that conforms to Chapter 3 policies of the Coastal Act. The Commission must, therefore, enforce the requirement of the certified LUP to provide additional parking spaces or pay in-lieu fees in order to not prejudice the City's ability to prepare an LCP that conforms to the Chapter 3 policies of the Coastal Act.

According to BIZ Coastal Parking Impact Trust Fund criteria, multiple family residential projects of three units or more in the BIZ shall provide an additional parking space for each 1,000 square feet of floor area of the ground floor. Up to 100% of the total number of additional parking spaces required may be paid for in lieu of providing the spaces. The ground floor is 39 feet wide by 98 feet long (4 units at 24 feet 6 inches long) and has a floor area of 3,822 square feet (4 units at 955.5 square feet). The four-unit condominium, therefore, requires the provision of three parking spaces or payment of fees in lieu of the three spaces. The project has been conditioned to provide three parking spaces as proposed, in addition to the nine spaces required to meet the residential parking needs. As stated earlier, the twelve proposed on-site parking spaces exceed the residential parking requirements of the LUP by three spaces. The project as proposed meets both the residential and BIZ parking requirements.

The Commission is aware that historically "bootleg" residential units have been established throughout Venice. In this case, staff is aware of the possibility of additional residential units being established within the proposed structure due to the availability of three extra on-site parking spaces and direct access via the stairways

from the garage into potential "studios." The project is conditioned to allow only four residential units on the subject property in order to prevent the establishment of additional residential units, without an amendment to this permit.

The Commission finds that, only as conditioned to ensure the continued provision of adequate on-site parking and the provision of additional parking in the BIZ, is the proposed project consistent with Section 30604(a) and the public access policies of the Coastal Act.

F. LOCAL COASTAL PROGRAM

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

(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 subarea. The Los Angeles City Council adopted a draft LUP for Venice on October 29, 1999. The City submitted the draft Venice LUP for Commission certification and on November 14, 2000, the Commission certified the Venice Land Use Plan with suggested modifications. The LUP is not effectively certified, however, because the City Council has not yet formally adopted the changes. The Commission has not approved an implementation plan for Venice. Venice, therefore, does not have a certified LCP and the standard of review for development is still the Coastal Act. The proposed project, only as conditioned to preserve the pedestrian scale of Brooks Avenue and the unique character of the North Venice community, and to provide all required parking, conforms to the certified Venice LUP.

The proposed project, only as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City's ability to prepare a Local

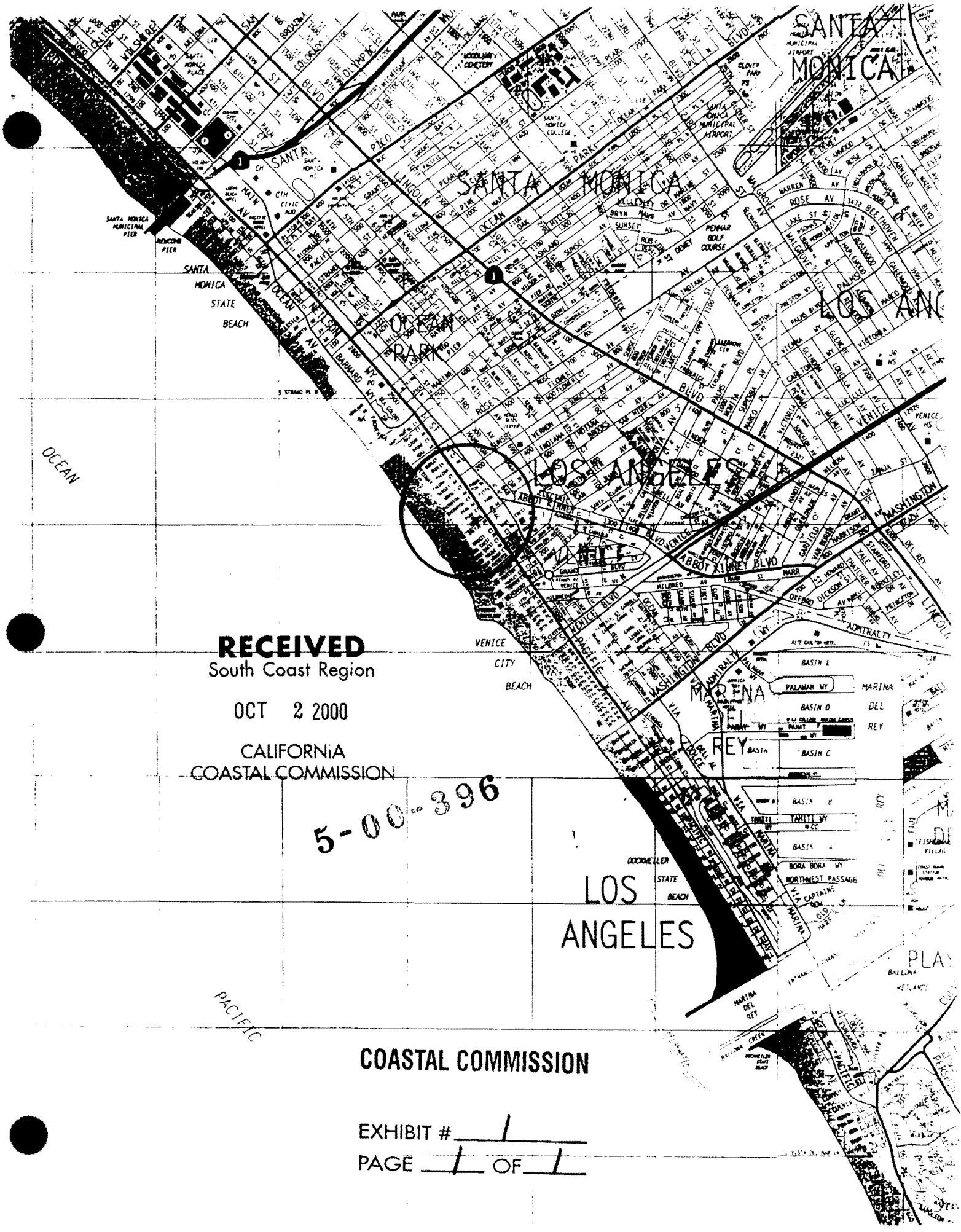
Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

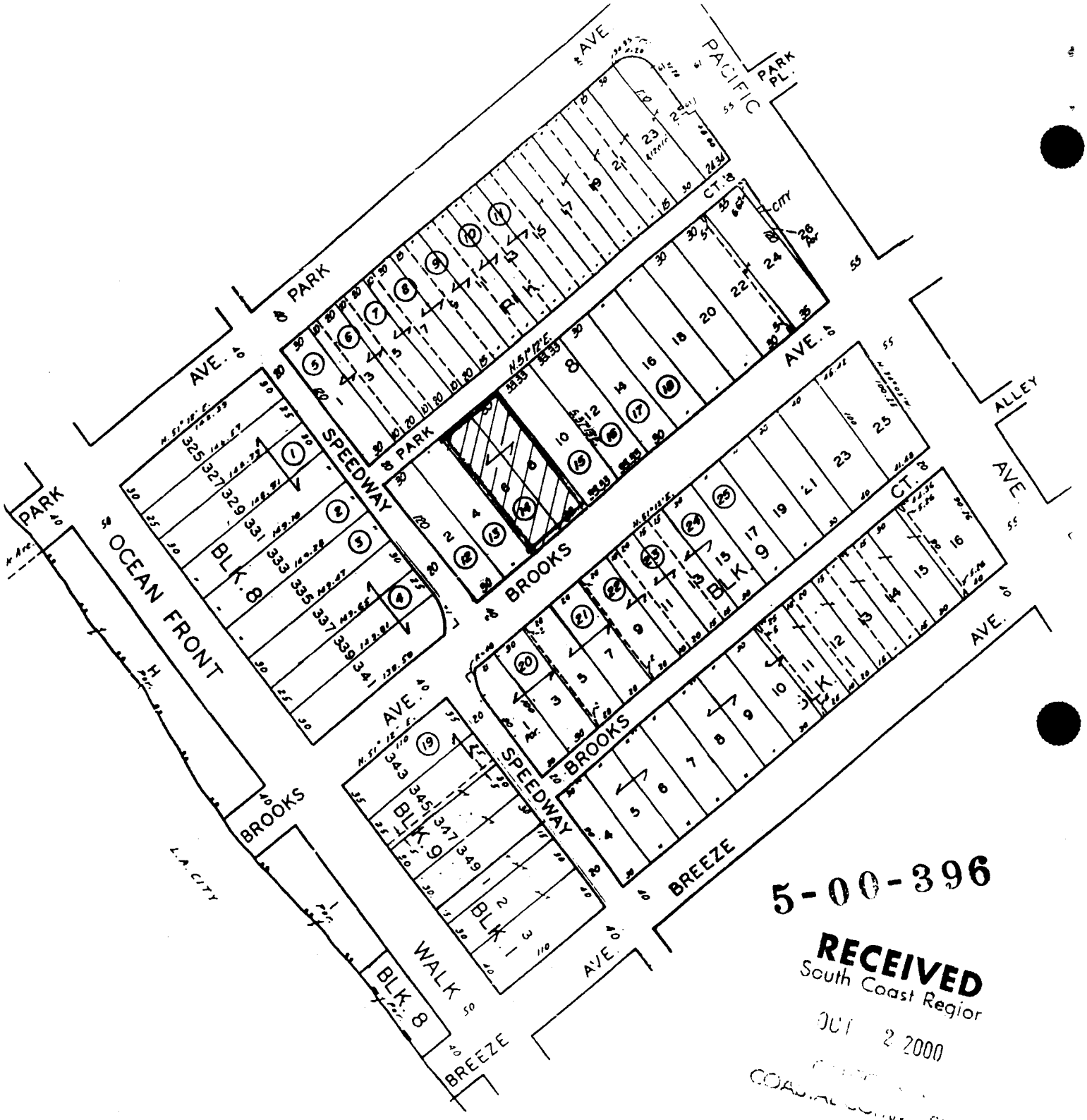
F. CALIFORNIA ENVIRONMENTAL QUALITY ACT

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 that the activity may have on the environment.

The proposed project, as conditioned, has been found consistent with the Chapter 3 policies of the Coastal Act. All adverse impacts have been minimized and there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.

End/KT





5-00-396

RECEIVED
South Coast Region
OCT 2 2000
COASTAL COMMISSION

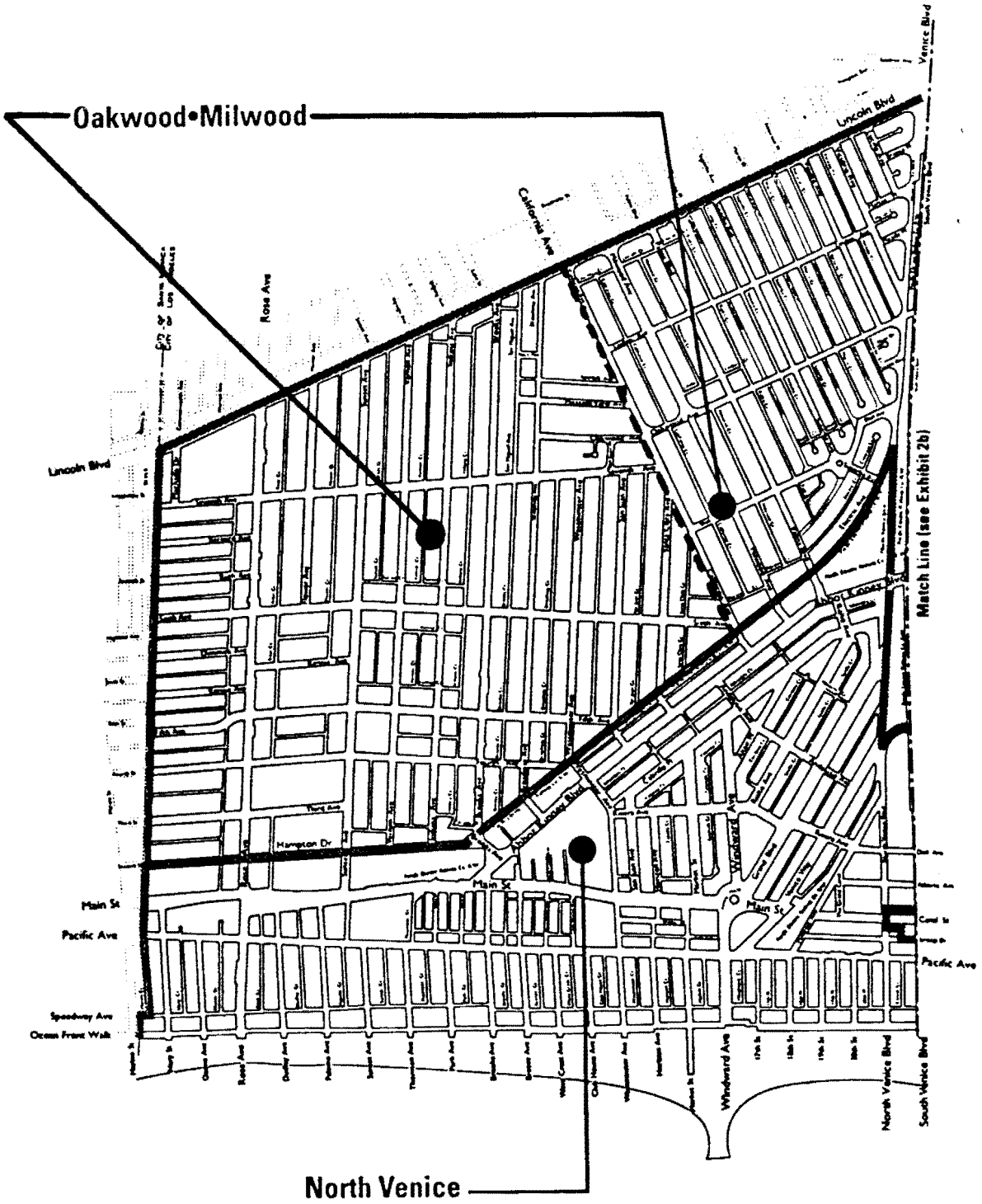
COASTAL COMMISSION

EXHIBIT # 2

PAGE 1 OF 1

Heron Maps

(310) 317-1515
20756 Seaboard Road
Malibu CA 90265



COASTAL COMMISSION

Exhibit 2a

Venice Coastal Zone

EXHIBIT # 3

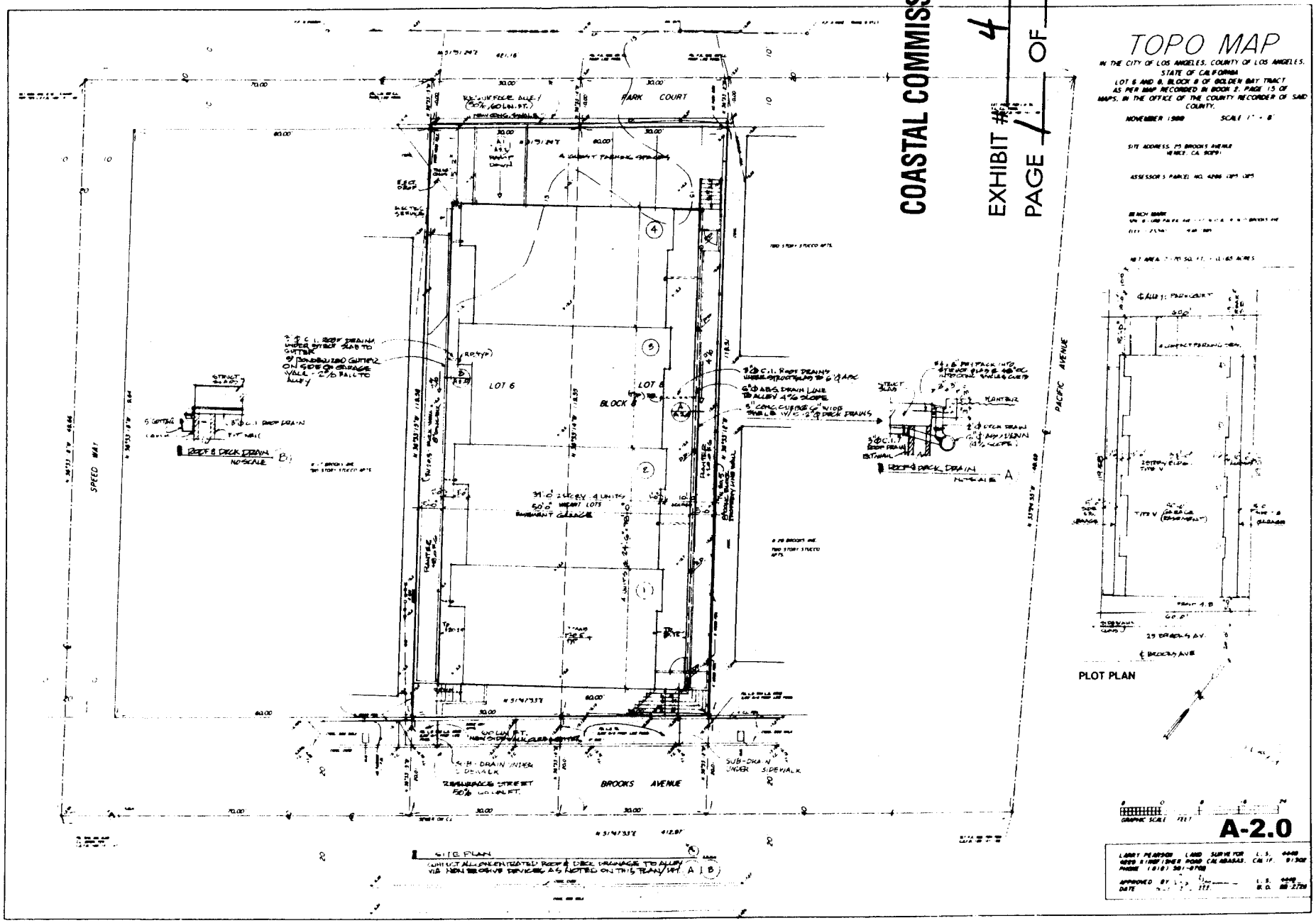
PAGE 1 OF 1

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

COASTAL COMMISSION

EXHIBIT # 4

PAGE 1 OF 12



TOPO MAP

IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

LOT 6 AND 8, BLOCK 8 OF GOLDEN BAY TRACT, AS PER MAP RECORDED IN BOOK 2, PAGE 15 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

NOVEMBER 1989 SCALE 1" = 8'

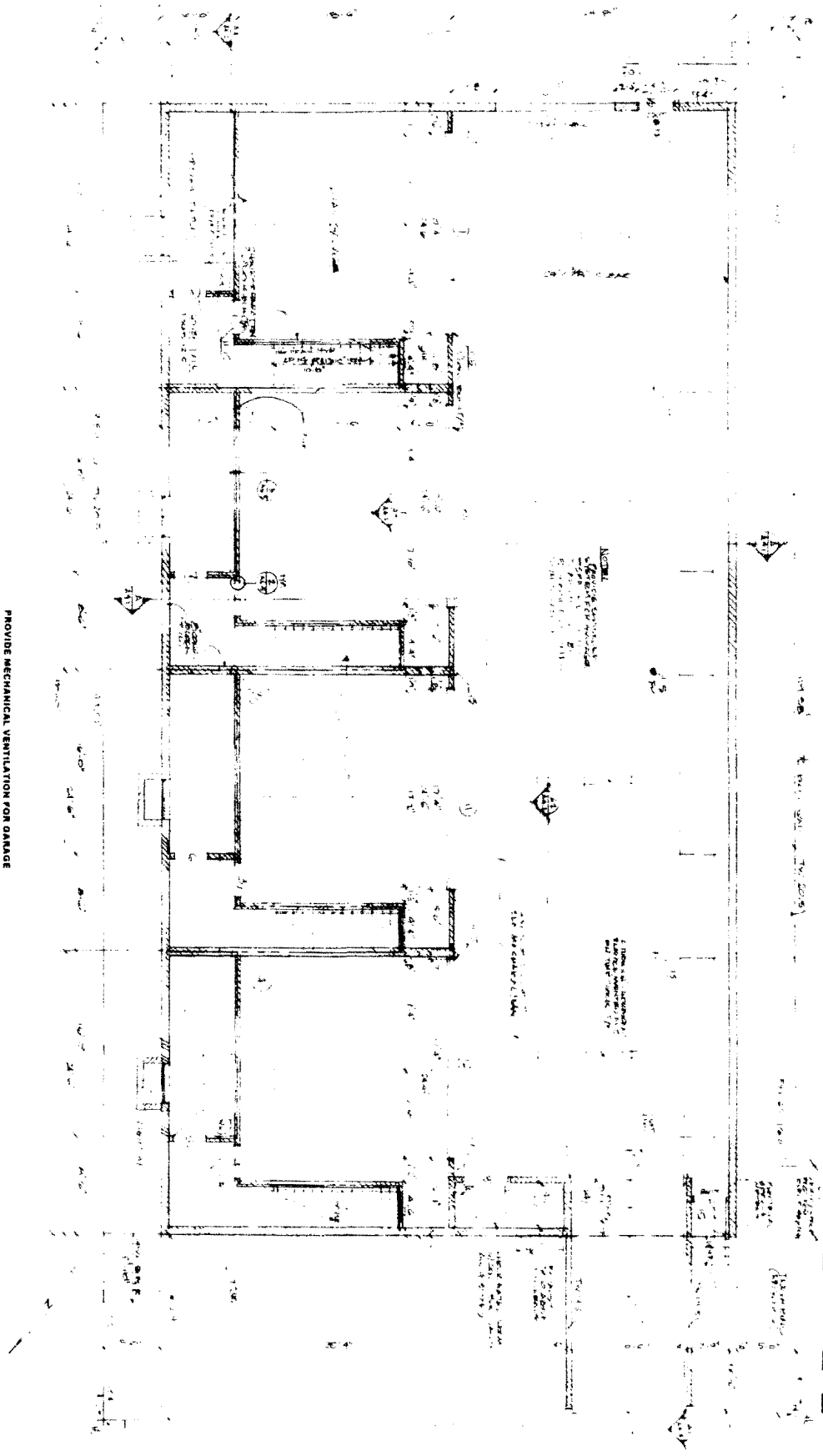
SITE ADDRESS: 25 BROOKS AVENUE VENICE, CA. 90291

ASSESSOR'S PARCEL NO. 4286-029-015

A-2.0

LARRY PEARSON LAND SURVEYOR L.S. 4449
4859 KINGSLEY ROAD CALABASAS, CALIF. 91302
PHONE (818) 591-8788

APPROVED BY L.S. 4449
DATE 1-2-90 BM 2700



PROVIDE MECHANICAL VENTILATION FOR GARAGE

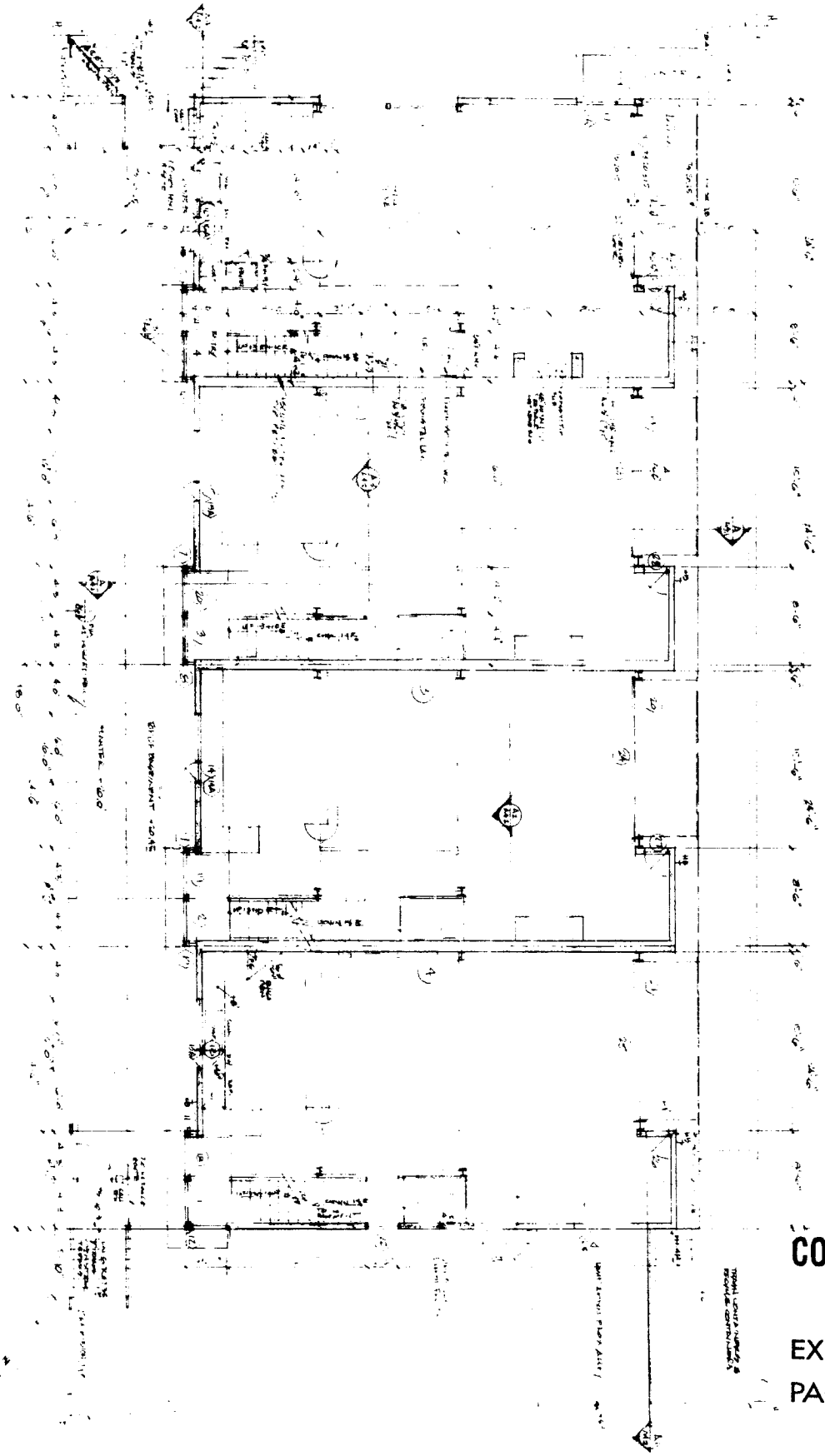
COASTAL COMMISSION

EXHIBIT # 4

PAGE 2 OF 12

BEACHLOFTS - BROOKS APARTMENTS

A-2.1



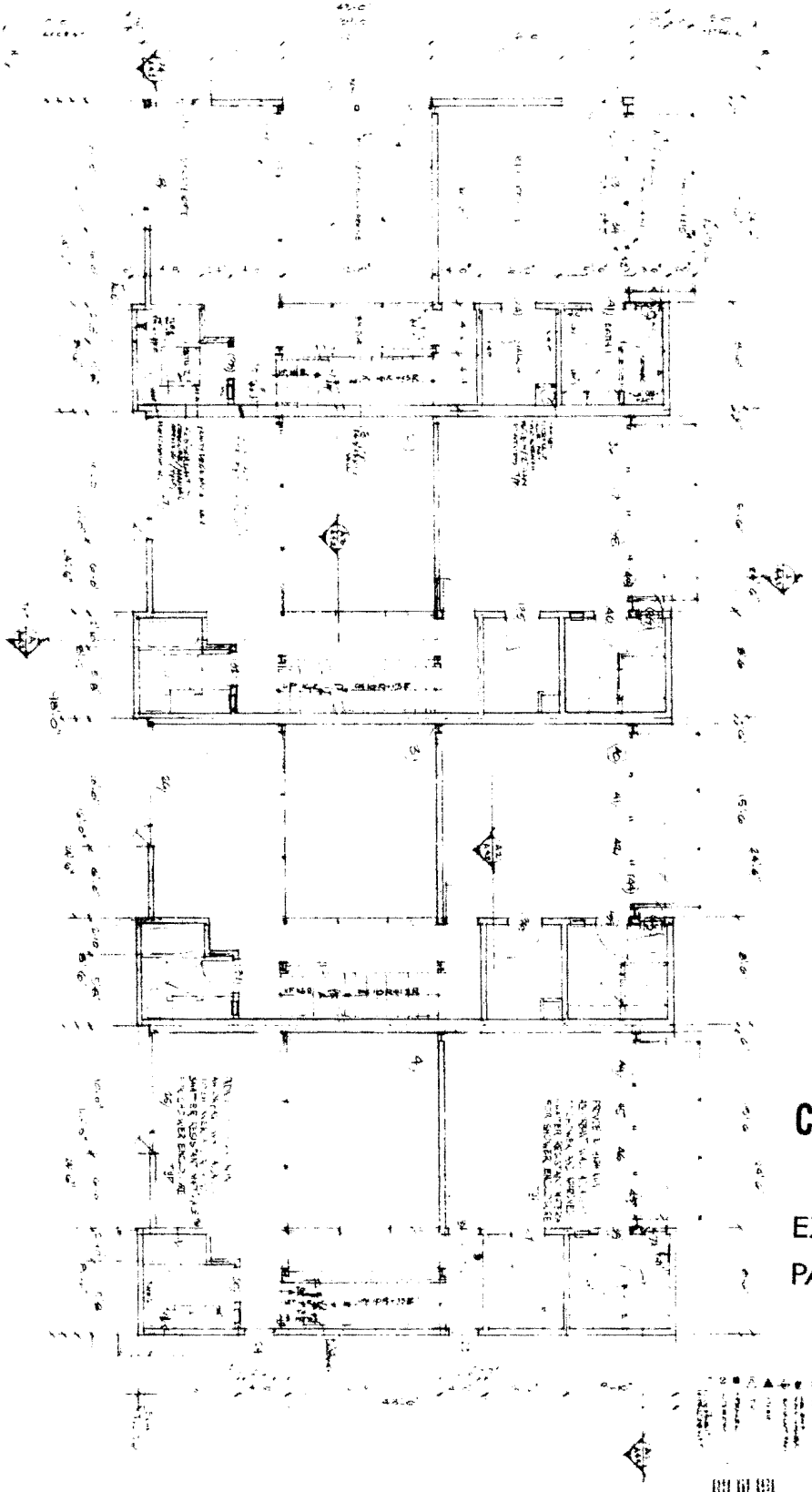
COASTAL COMMISSION

EXHIBIT # 4

PAGE 3 OF 12

BEACHLOFTS · BROOKS APARTMENTS

A-2.2



COASTAL COMMISSION

EXHIBIT # 4

PAGE 4 OF 12

BEACHLOFTS · BROOKS APARTMENTS

A-2.3

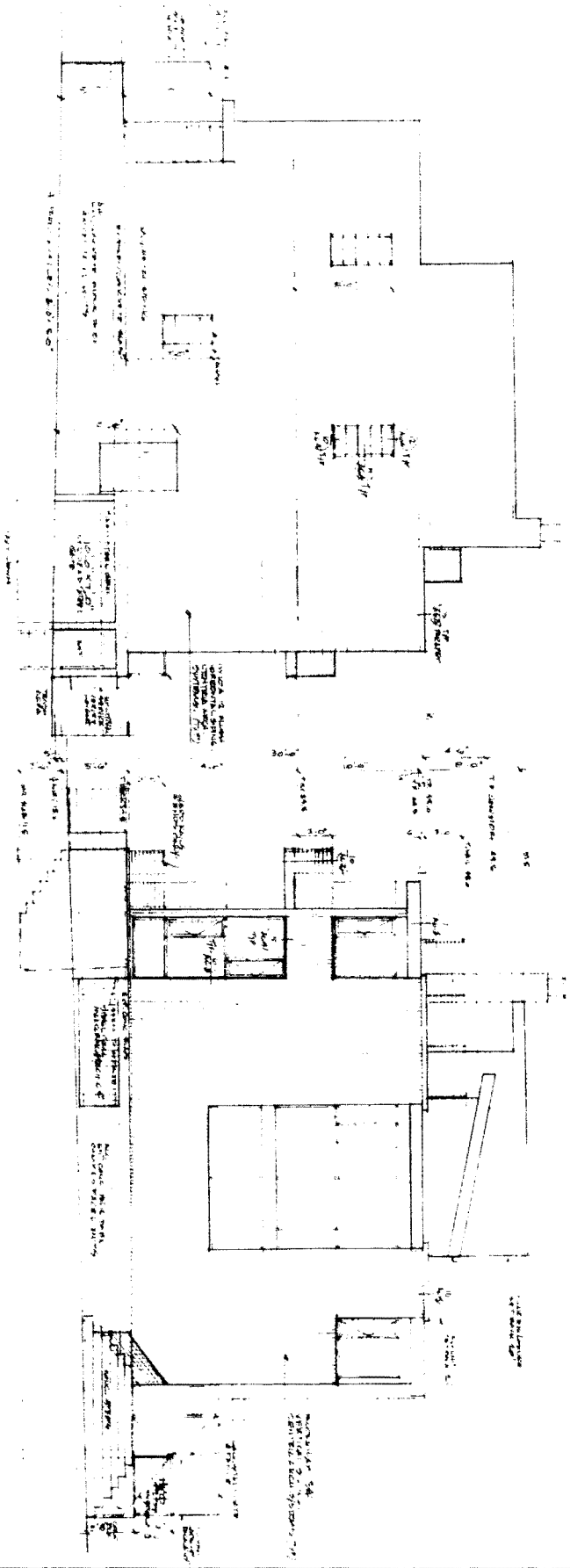
COASTAL COMMISSION

EXHIBIT # 4

PAGE 5 OF 12

BEACHLOFTS · BROOKS APARTMENTS

A-2.4



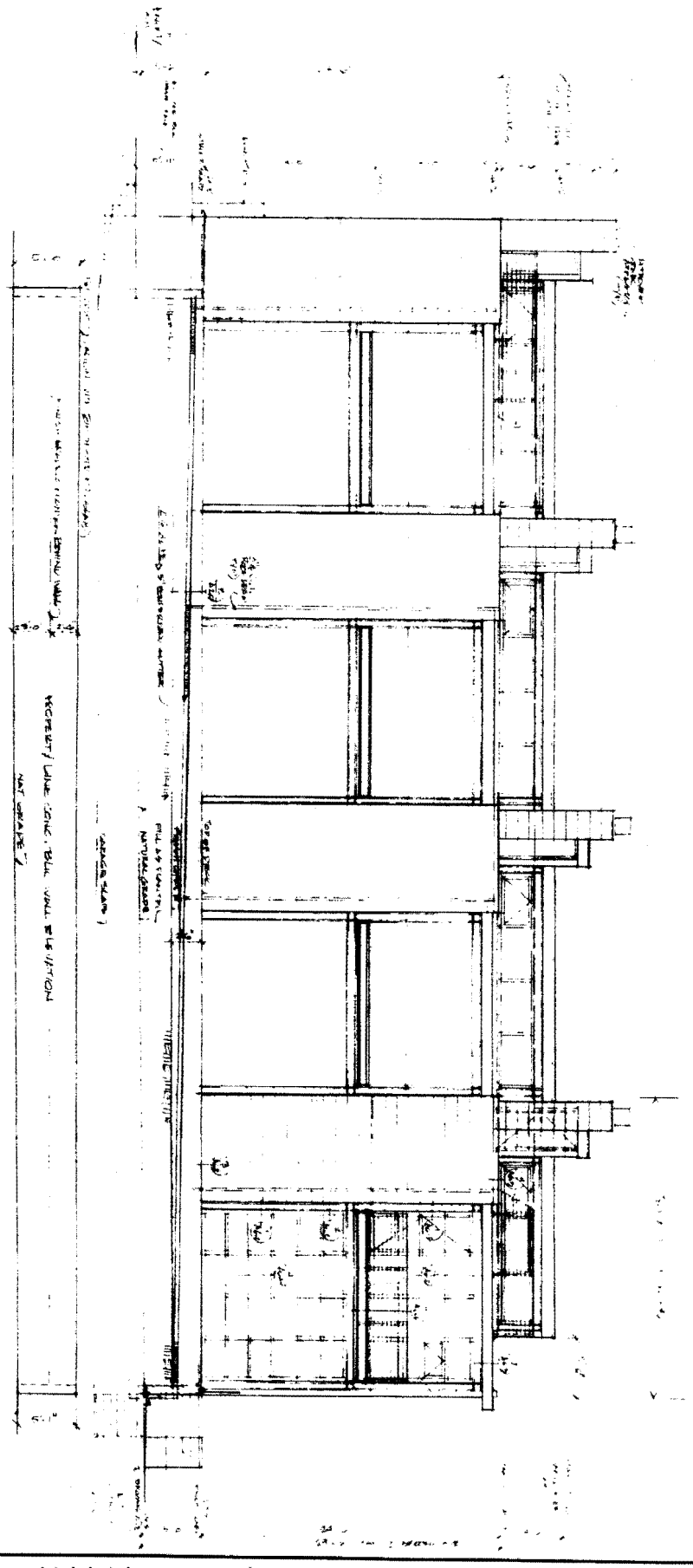
COASTAL COMMISSION

EXHIBIT # 4

PAGE 6 OF 12

A-3.1

BEACHLOFTS - BROOKS APARTMENTS



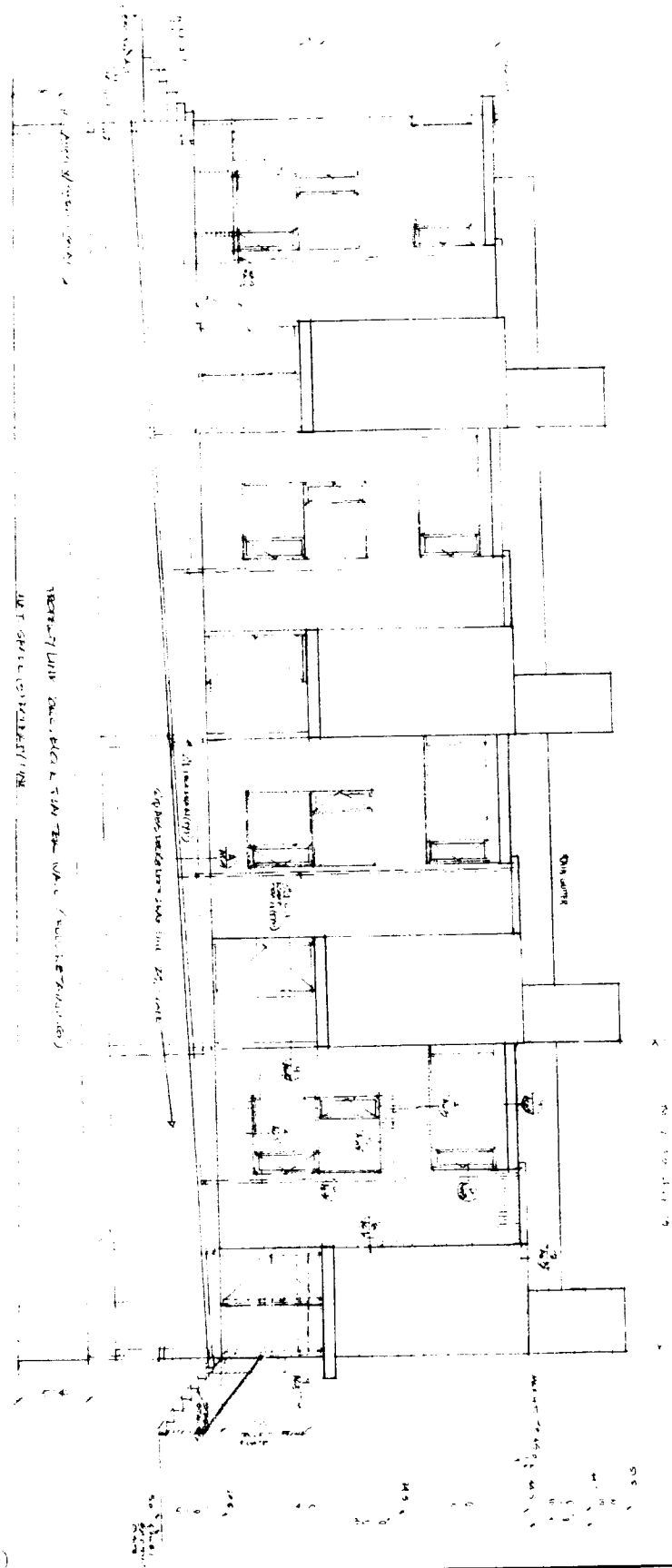
COASTAL COMMISSION

EXHIBIT # 4

PAGE 7 OF 12

BEACHLOFTS - BROOKS APARTMENTS

A-3.2



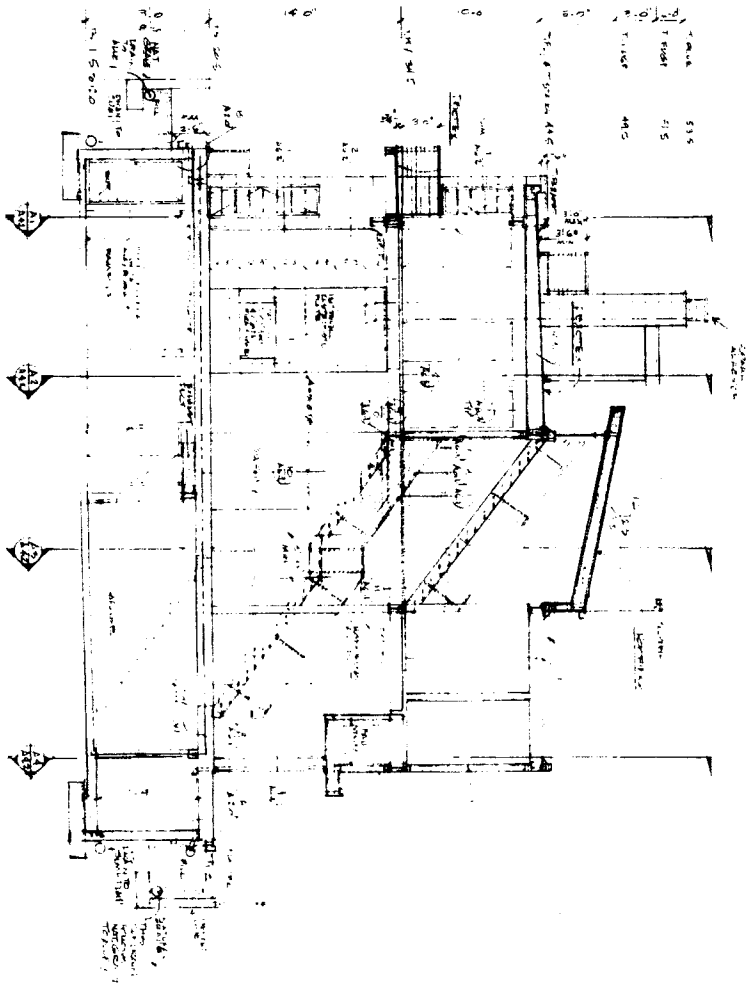
BEACHLOFTS - BROOKS APARTMENTS

A-3.3

COASTAL COMMISSION

EXHIBIT # 4

PAGE 8 OF 12



COASTAL COMMISSION

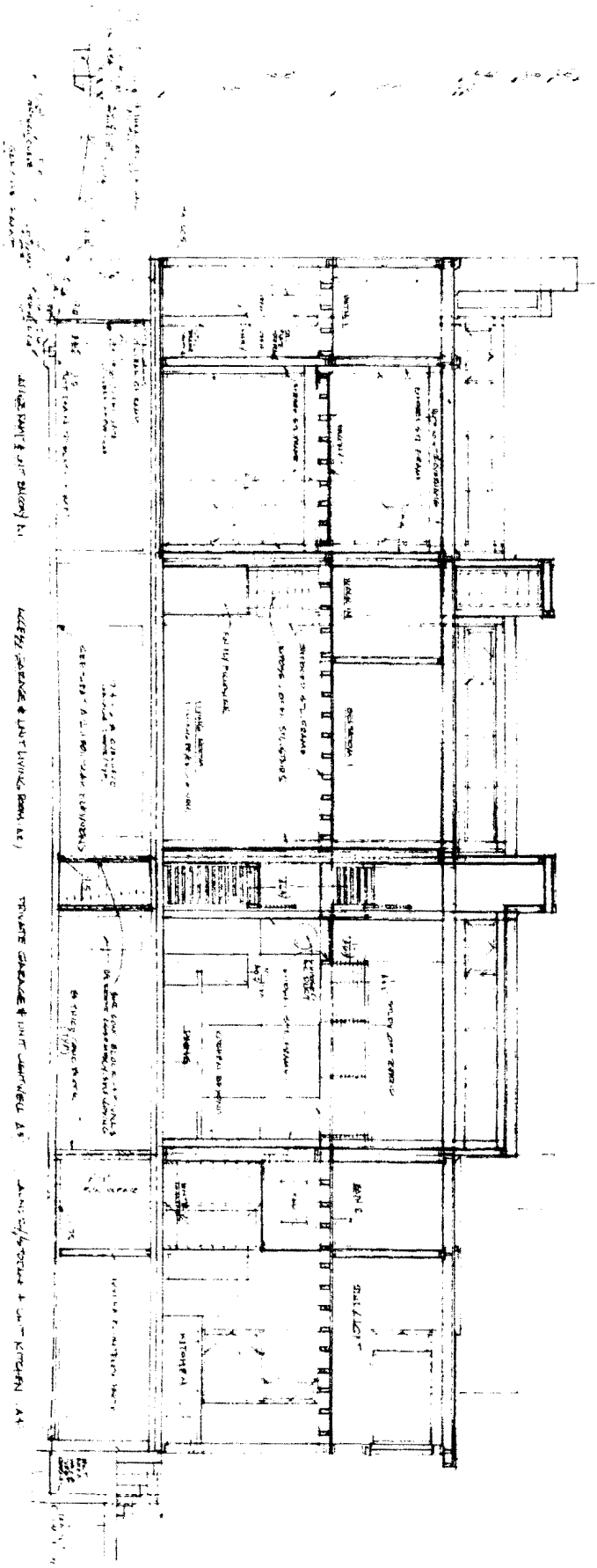
EXHIBIT # 4

PAGE 9 OF 12

A-4.1

BEACHLOFTS - BROOKS APARTMENTS

STEVEN EMBLICH



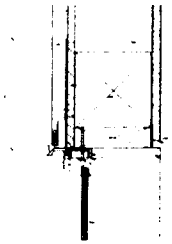
COASTAL COMMISSION

EXHIBIT # 4

PAGE 10 OF 12

BEACHLOFTS - BROOKS APARTMENTS

A-4.2



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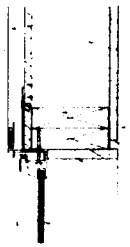

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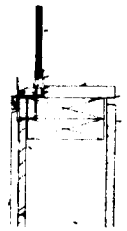

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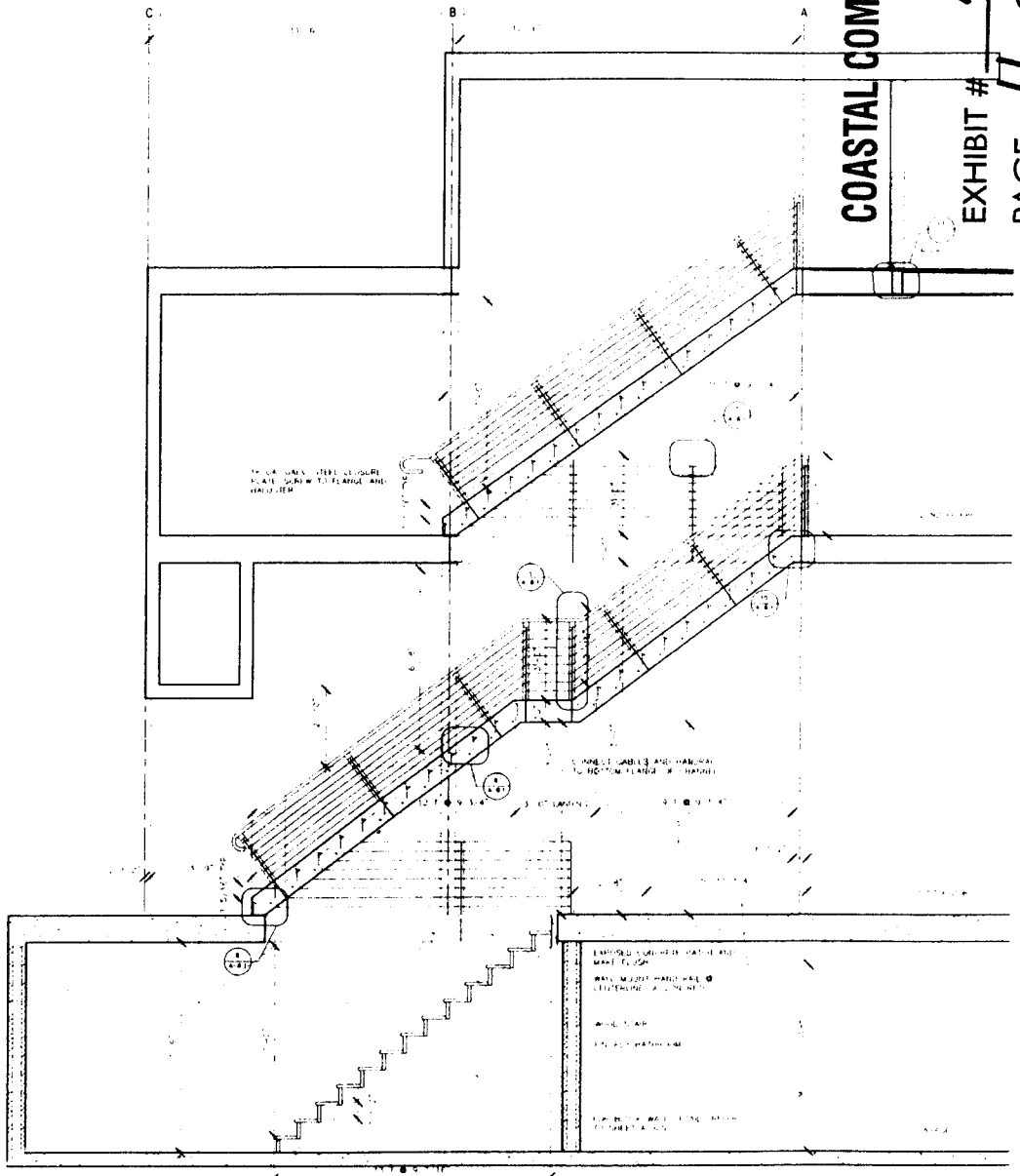


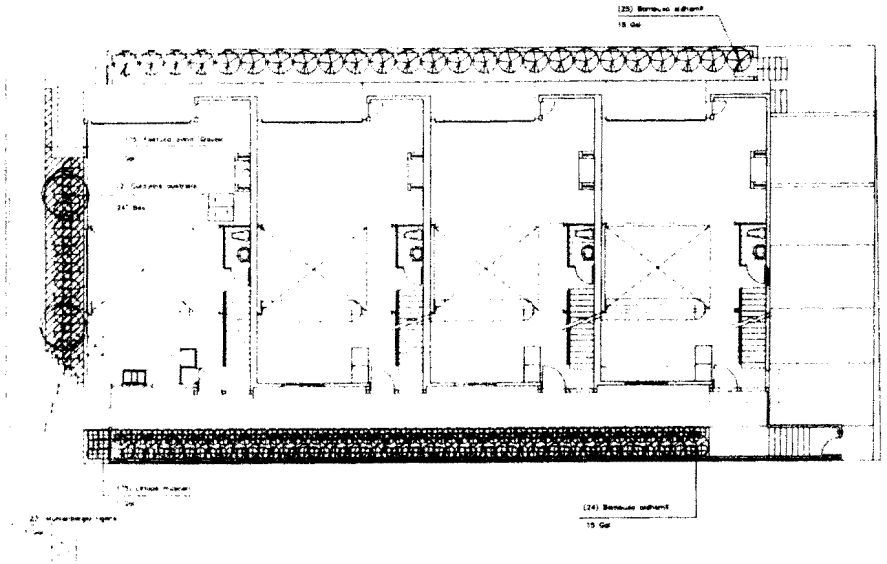
STAIR DETAIL ELEVATION 1

STEVEN ENGLISH
ARCHITECTS

BEACHLOFTS - BROOKS APARTMENTS

STAIR DETAIL

A-6.4



PLANTING LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	QTY	SIZE
	Carissa grandiflora	Carissa	7	24" Box
	Bambusa oldhamii	Oldham Bamboo	49	15 Gal
	Buhemborgia rigens	Deer Grass	23	1 Gal
	Libbia moorei	Big Blue Lily Turf	175	1 Gal
	Festuca ovina Glauca	Sheep Fescue	175	1 Gal

LANDSCAPE POINTS

Total square footage of Project site: 7,139
Total number of points required for site: 2

Detail of Points	Points Claimed	Circuit
Planting of any tree, of a taxon that does not exist within a 1000-foot radius of the project boundaries.	1	1 of 1
Plants 100% Los Angeles area natives that will remain in good health on natural rainfall after three years establishment.	2	2 of 1
TOTAL	3	

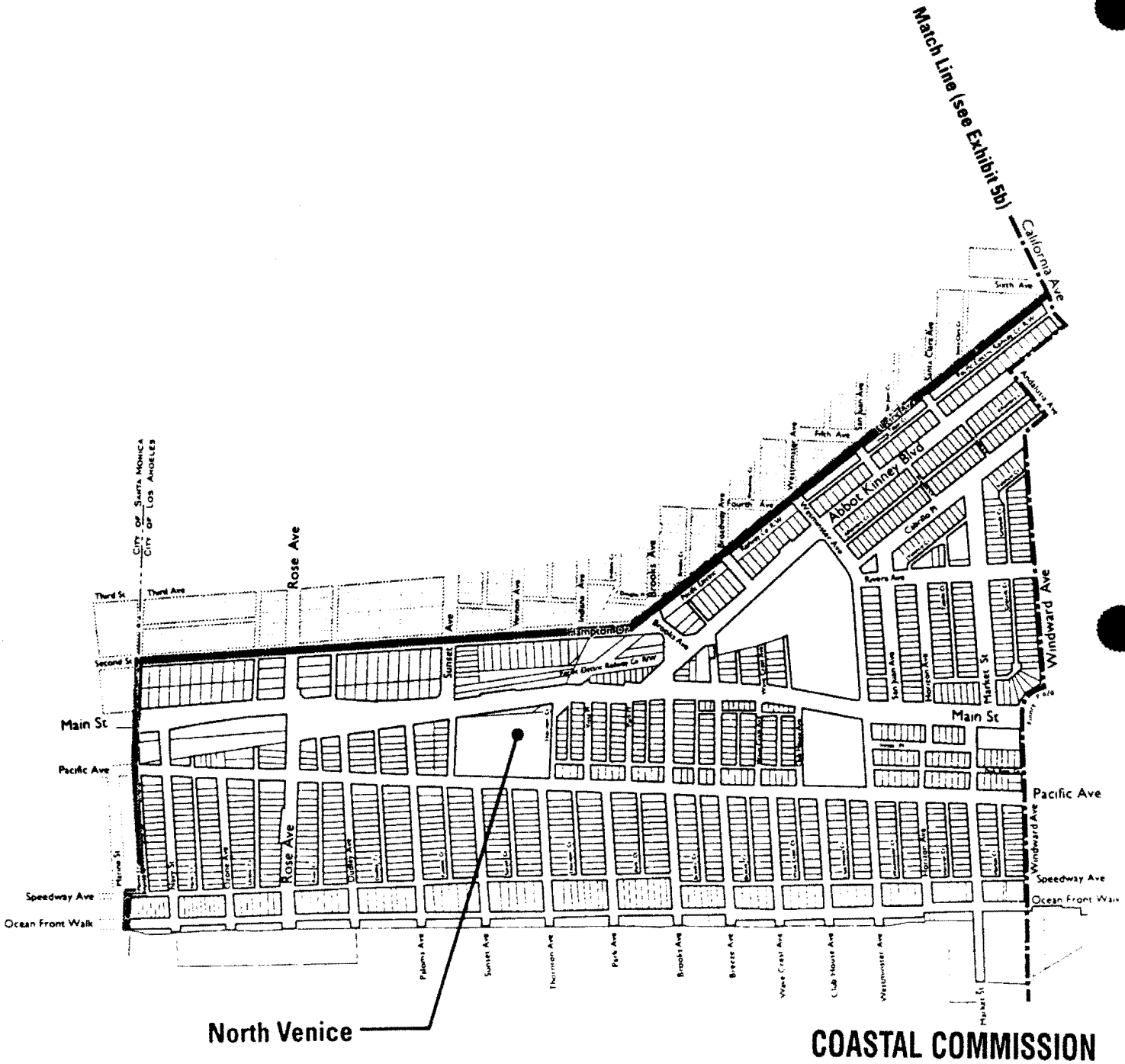
LANDSCAPE ARCHITECT
RAYMOND HANSEN, INC.
PHONE #'S
ADDRESS
FAX #
E-MAIL

PLANTING PLAN

BEACH LOFTS
BROOKS CONDOS
25 Brooks Avenue
Venice, CA 90291

3.21.00

L-0



COASTAL COMMISSION

EXHIBIT # 5

PAGE 1 OF 1

Exhibit 5a

Subarea: North Venice • Venice Canals

Not to Scale

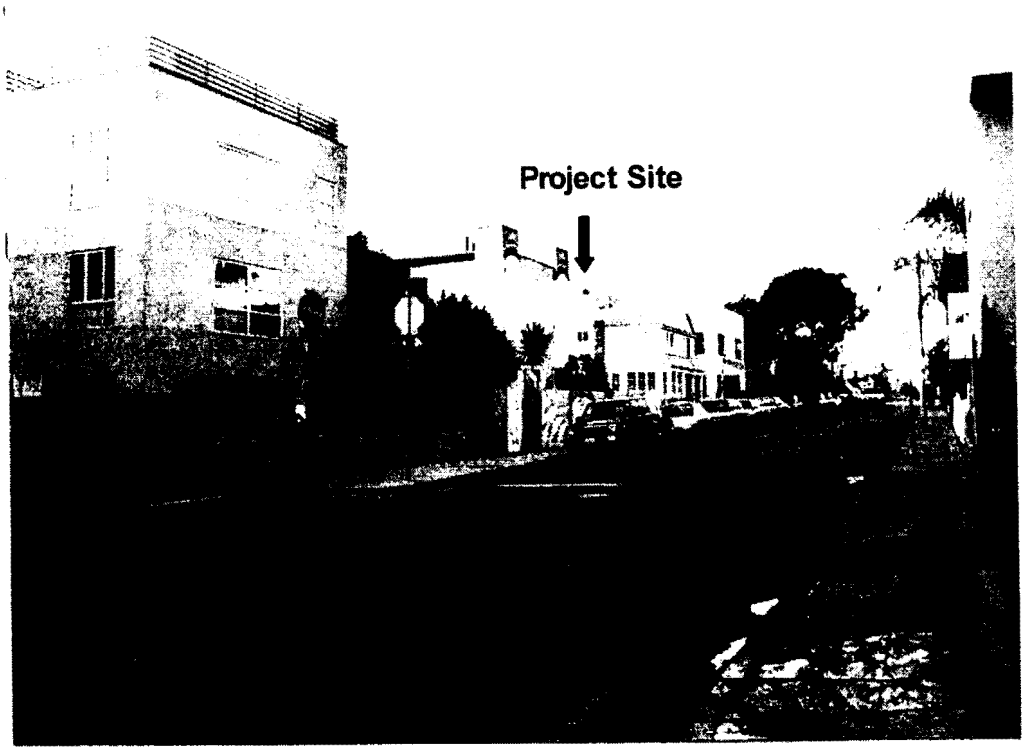


Photo 1: View of north side of Brooks Avenue looking northeast

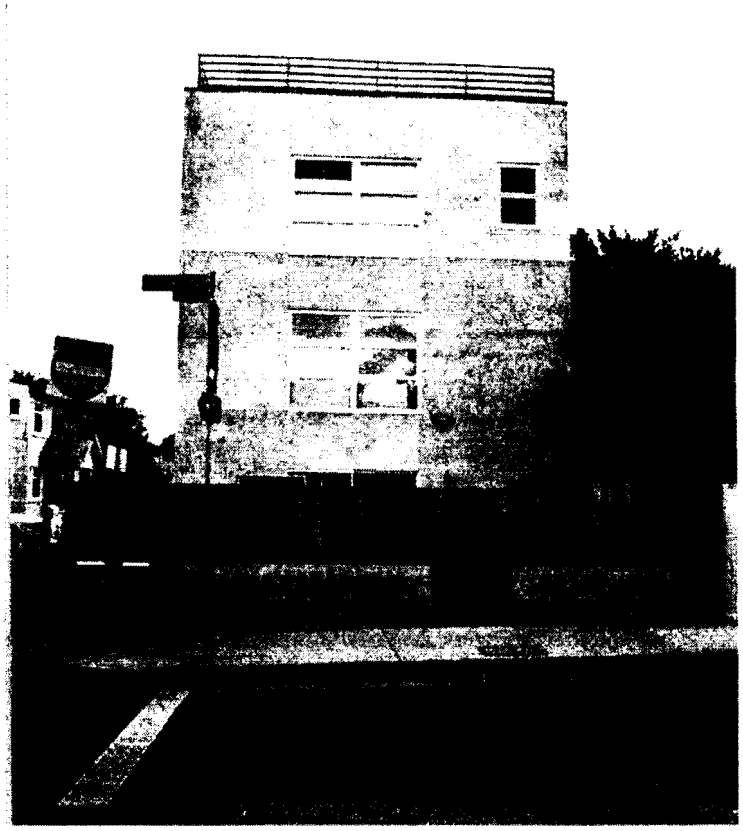


Photo 2: 15 Brooks Avenue

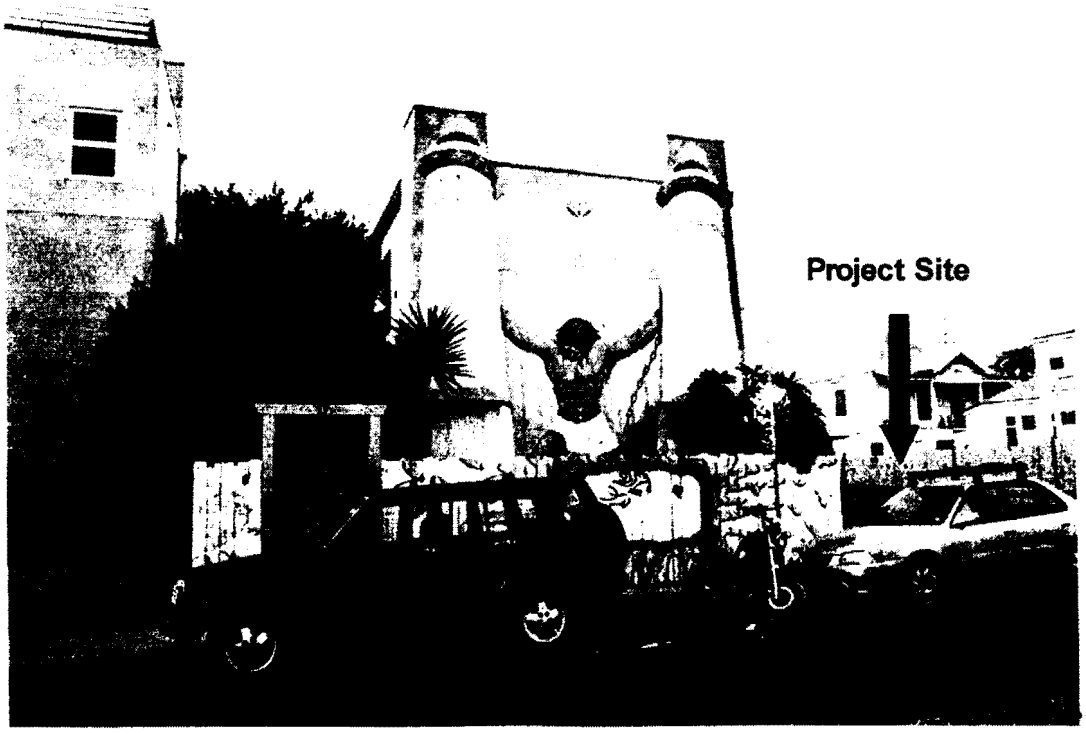


Photo 3: 17 Brooks Avenue

COMMISSION

EXHIBIT # 6

PAGE 2 OF 9

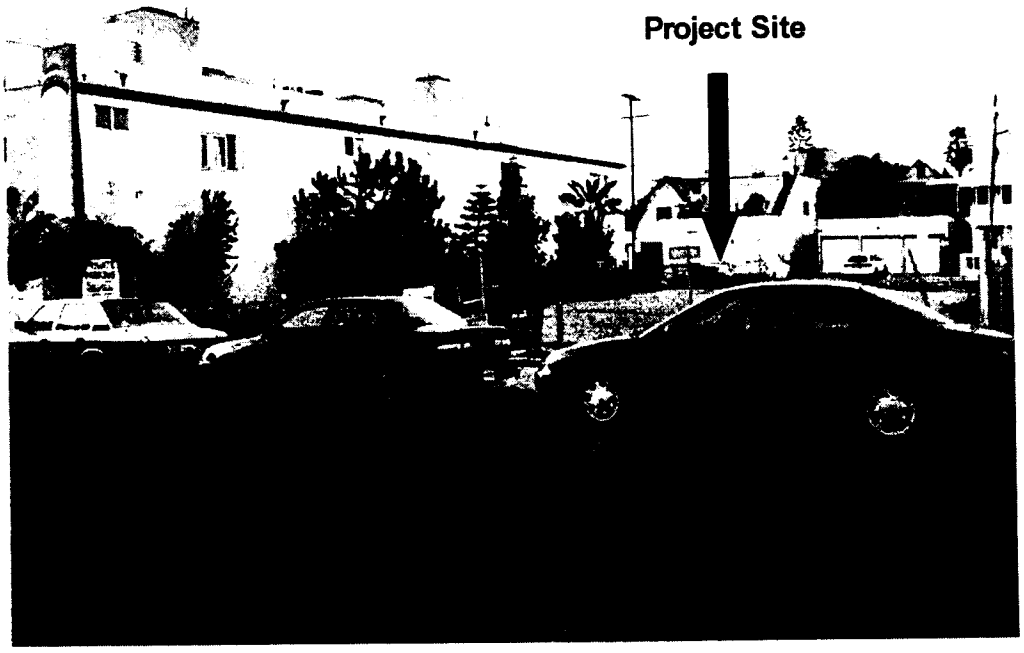


Photo 4: 25 Brooks Avenue

Photo 5: 29 and 33 Brooks Avenue

Photo 6: 37 and 39 Brooks Avenue

Photo 7: Vacant lot & residence on corner of Brooks Ave. & Pacific Ave.

Photo 8: View of south side of Brooks Avenue looking southeast

Photo 9: 14 Brooks Avenue

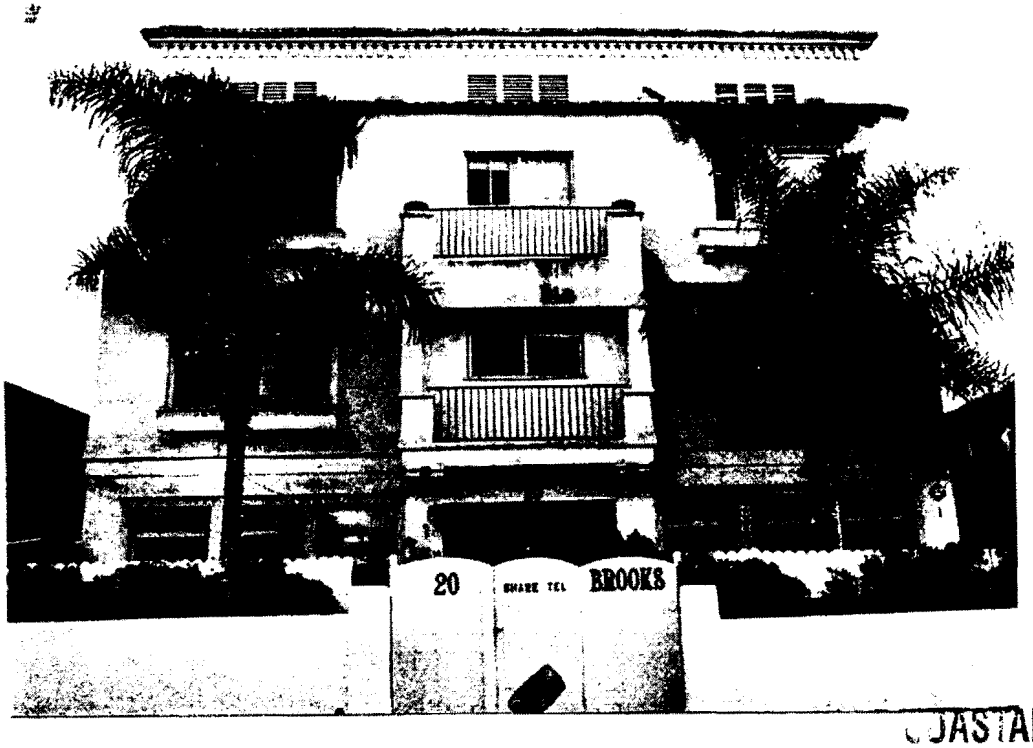


Photo 10: 20 Brooks Avenue

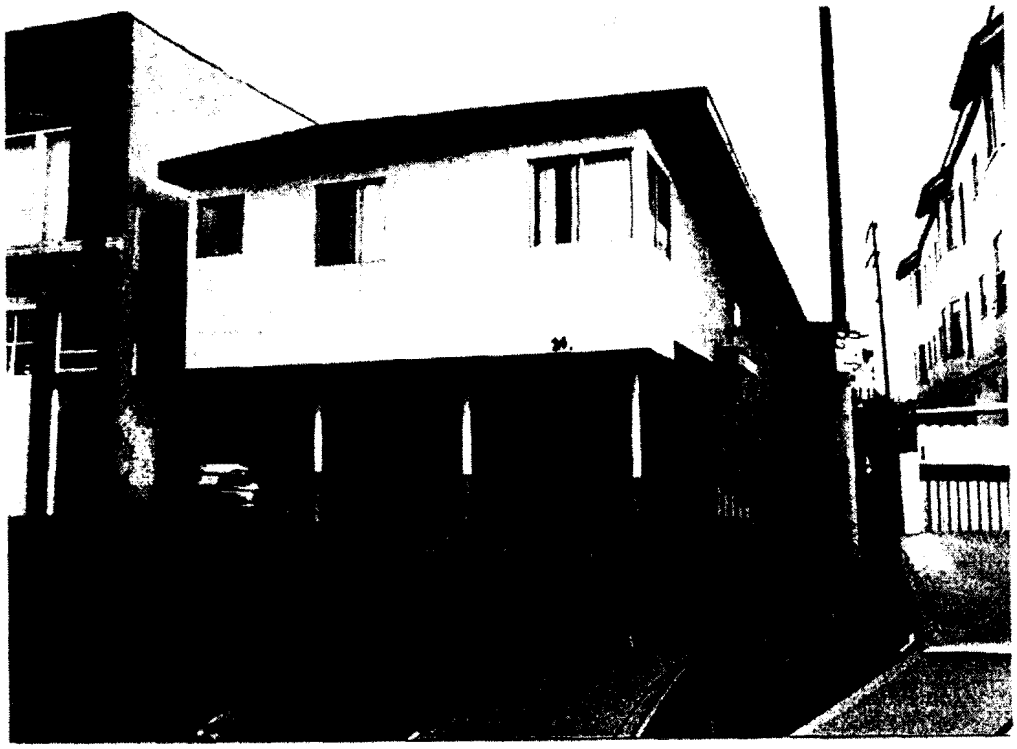


Photo 11: 24 Brooks Avenue

Photo 12: 26 Brooks Avenue

Photo 13: 34 and 36 Brooks Avenue

Photo 14: 40 and 42 Brooks Avenue

Photo 15: 50 Brooks Avenue

1. **Front Yard** - -- Same as required in R1 Zone -- Section 12.08 C 1.

2. **Side Yards** -- Same as required in R1 Zone -- Section 12.08 C 2.

3. **Rear Yard** -- Same as required in R1 Zone -- Section 12.08 C 3.

4. **Lot Area** -- Every lot shall have a minimum width of 50 feet and a minimum area of 5,000 square feet. The minimum lot area per dwelling unit shall be 2,500 square feet, except for apartment houses, boarding or rooming houses, and multiple dwellings on lots having a side lot line adjoining a lot in a commercial or industrial zone as provided for in Subsection A of this section, which uses shall comply with the lot area per dwelling unit and guest room regulations of the R3 Zone. *(Amended by Ord. No. 126,309, Eff. 2/13/64.)*

Provided, that where a lot has a width of less than 50 feet or an area of less than 5,000 square feet and was held under separate ownership or was of record at the time this article became effective, such lot may be occupied by any use permitted in this section, except for those uses requiring more than 5,000 square feet of lot area. In no case, however, shall a two-family dwelling or two single-family dwellings be allowed on a lot with an area of less than 4,000 square feet. *(Amended by Ord. No. 147,542, Eff. 9/4/75.)*

Exceptions to area regulations are provided for in Section 12.22 C.

SEC. 12.08.1 -- RD RESTRICTED DENSITY MULTIPLE DWELLING ZONE. *(Added by Ord. No. 127,777, Eff. 8/1/64.)*

The following regulations shall apply in the RD Restricted Density Multiple Dwelling Zone:

A. **Use** -- No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for the following uses, and when a "Supplemental Use District" is created by the provisions of Article 3 of this chapter, for such uses as may be permitted therein:

1. One-family dwellings.

2. Two-family dwellings.

3. Multiple dwellings or group dwellings.

4. Apartment houses.

5. Parks, playgrounds or community center, owned and operated by a governmental agency.

6. The keeping of equines, in conjunction with the residential use of the lot, and subject to the following limitations:

(a) Such activities are not for commercial purposes.

(b) The keeping of equines shall be permitted only on lots having an area of 20,000 square feet or more. Where equines are being kept, the number of such animals being kept shall not exceed one for each 5,000 square feet of lot area. *(Amended by Ord. No. 157,144, Eff. 11/22/82.)*

7. Accessory buildings, including private garages, accessory living quarters, servants quarters, recreation rooms, or private stables, provided that:

(a) Every accessory building containing accessory living quarters or servants quarters shall constitute a dwelling and the lot area requirements of the zone in which it is located shall be complied with.

(b) No stable is located or maintained on a lot having an area of less than 20,000 square feet and its capacity does not exceed one equine for every 5,000 square feet of lot area. *(Amended by Ord. No. 157,144, Eff. 11/22/82.)*

(c) An accessory living quarters, servants quarters, recreation room or private garage or any combination of said uses may be included in one building not exceeding two stories in height. For location of accessory buildings, refer to Section 12.21 C.

8. Conditional uses enumerated in Section 12.24 when the location is approved pursuant to the provisions of said section.

9. Accessory uses and home occupations, subject to the conditions specified in Section 12.05 A 16 of this Code. *(Amended by Ord. No. 171,427, Eff. 1/4/97, Oper. 3/5/97.)*

10. *(Repealed by Ord. No. 171,687, Eff. 8/19/97.)*

11. Name plates and signs, and required automobile parking spaces as provided for in Section 12.21 A of this Code. *(Added by Ord. No. 171,427, Eff. 1/4/97, Oper. 3/5/97.)*

B. **Area** -- No building or structure nor the enlargement of any building or structure shall be erected or maintained unless the following yards and lot areas are provided and maintained in connection with such building, structure or enlargement:

1. **Front Yard** -- There shall be a front yard of not less than 15 feet in depth in the RD1.5, RD2, RD3 and RD4 Zones and not less than 20 feet in depth in the RD5 and RD6 Zones.

2. **Side Yard** --

(a) **RD1.5 and RD2 Zones.** For a main building not more than two stories in height in the RD1.5 and RD2 Zones, there shall be a side yard on each side of said building of not less than five feet, except that where the lot is less than 50 feet in width, the side yard may be reduced to 10 percent of the width of the lot, but in no event to less than three feet in width. For a building more than two stories in height in the RD1.5 and RD2 Zones, one foot shall be added to the width of such yard for each additional story above the second story, but in no event shall a side yard of more than 16 feet in width be required.

(b) **RD3 and RD4 Zones.** There shall be a side yard on each side of a main building in the RD3 and RD4 Zones of not less than five feet or 10 percent of the width of the lot, whichever is larger, but in no event shall a side yard of more than 10 feet be required.

(c) **RD5 and RD6 Zones.** There shall be a side yard on each side of a main building in the RD5 and RD6 Zones of not less than 10 feet in width.

3. **Rear Yard** -- There shall be a rear yard of not less than 15 feet in depth in the RD1.5, RD2, RD3 and RD4 Zones and not less than 25 feet in depth in the RD5 and RD6 Zones.

4. **Lot Area** -- Every lot classified in the RD Zone is, according to the lot area requirements, further designated as RD1.5, RD2, RD3, RD4, RD5 or RD6.

Every lot shall have a minimum width, area and lot area per dwelling unit or guest room as follows:

[Lot Size--RD Zone]

Minimum Lot Area

Zone	Minimum Lot Width (feet)	Minimum Lot Area (square feet)	Per Dwelling Unit or Guest Room (square feet)
RD1.5	50 feet	5,000 square feet	1,500 square feet
RD2	50 feet	5,000 square feet	2,000 square feet
RD3	60 feet	6,000 square feet	3,000 square feet
RD4	60 feet	8,000 square feet	4,000 square feet
RD5	70 feet	10,000 square feet	5,000 square feet
RD6	70 feet	12,000 square feet	6,000 square feet

Exceptions to area regulations are provided for in Section 12.22 C.

(Amended by Ord. No. 156,381, Eff. 11/20/83.)

C. **Restriction** -- For any lot designated as Public, Quasi-Public, Public/Quasi-Public Use, Other Public, or Open Space on the land use map of the applicable community or district plan; any lot shown on the map as having existing lakes, waterways, reservoirs, debris basins, or similar facilities; any lot shown on the map as the location of a freeway right-of-way; and any property annexed to the City of Los Angeles where a plan amendment was not adopted as part of the annexation proceedings:

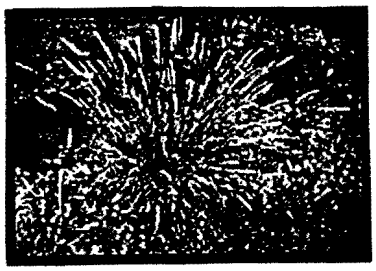
Any of the uses permitted by Subsection A of this section shall require prior approval in accordance with the provisions of Section 12.24.1 of this Code. *(Added by Ord. No. 163,679, Eff. 7/18/88.)*

(Amended by Ord. No. 173,268, Eff. 7/1/00.)

SEC. 12.08.3 -- RMP MOBILEHOME PARK ZONE. *(Added by Ord. No. 164,904, Eff. 7/7/89.)*

The following regulations shall apply in the "RMP" Mobilehome Park Zone:

A. **Purpose.** It is the purpose of the "RMP" Mobilehome Park Zone to encourage the provision of affordable housing in the City as provided in the Housing Element of the General Plan, by permitting both the retention and

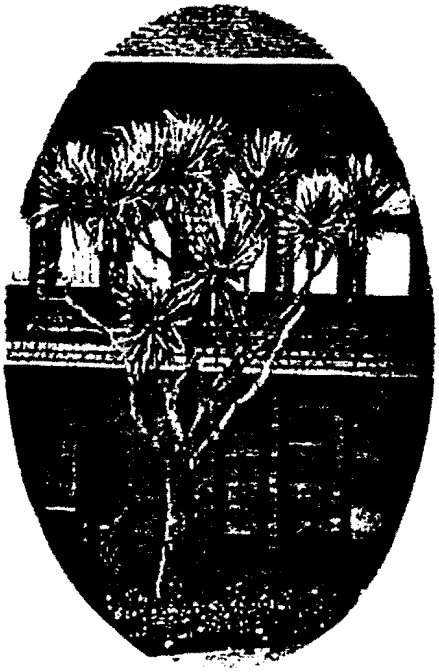


Sheep Fescue (*Festuca ovina glauca*)

Miniature to small size (height: 10"; spread: 10") semi-evergreen with a radiating clump growth habit.

Deer Grass (*Muhlenbergia rigens*)

Medium size (height: 2'; spread: 3') bunch grass with a dense tuft of green leaves.



Cordyline (*Cordyline australis*)

Medium (height: 20-30'; spread: 15') evergreen in upright form with a light canopy.