

CALIFORNIA COASTAL COMMISSION

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Filed: 2/21/3
 49th Day: 4/11/3
 180th Day: 8/20/3
 Staff: CP-LB
 Staff Report: 6/19/3
 Hearing Date: July 9, 2003
 Commission Action:

**W9c****STAFF REPORT: REGULAR CALENDAR****APPLICATION NUMBER:** 5-03-073**RECORD PACKET COPY****APPLICANT:** Lucia Ruta **AGENT:** Fred Cravea, Architect**PROJECT LOCATION:** 2508 Ocean Avenue, Venice, City of Los Angeles.

PROJECT DESCRIPTION: Construction of a three-story, 35-foot high (including roof access structure), 852 square foot second residential unit on a 2,617 square foot lot with an existing one-story single family residence. Two parking spaces, provided in the ground floor garage of the proposed building, would serve the resulting two residential units.

Lot Area	2,617 square feet
Building Coverage	1,275 square feet
Pavement Coverage	350 square feet
Landscape Coverage	992 square feet
Parking Spaces	2
Zoning	RD1.5-1
Plan Designation	Multi-family Residential/Low Medium II
Ht above final grade	27.5 feet with 35-foot roof access enc.

LOCAL APPROVAL: City of Los Angeles Zoning Administrator's Adjustment & Specific Plan Project Compliance, Case No. ZA 2002-4354, 1/29/03.

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 Sections 30251, 30252 and 30253 of the Coastal Act. The proposed project does not provide adequate parking and exceeds the 25-foot height limit for flat roofed buildings set forth in the certified Venice Land Use Plan (LUP). Residential density on the site would be increased, but the proposed project would not provide the additional parking necessary to maintain and enhance public access to the coast as required by Section 30252. The proposed 35-foot high structure does not conform with Sections 30251 and 30253, which require that the scenic and visual qualities of special coastal communities be protected, because the proposed project is out of scale and character with the surrounding neighborhood. Approval of the development, as proposed would set a negative precedent and prejudice the ability of the City to prepare an LCP that conforms with Chapter 3 policies of the Coastal Act because the proposed development violates the building standards (parking requirement and height limit) set forth in the certified Venice LUP. The applicant objects to the staff's recommendation. **See Page Two for Motion.**

SUBSTANTIVE FILE DOCUMENTS:

1. Certified Land Use Plan for Venice, City of Los Angeles, 6/14/01.
2. Venice Specific Plan, City of Los Angeles Ordinance No. 172897.
3. Coastal Commission Regional Interpretive Guidelines for Los Angeles County, 1980.
4. Coastal Development Permit 5-03-214-W (Lambrecht), 2419 Ocean Avenue, Venice.
5. Coastal Development Permit 5-02-026-W (Lavery), 2504 Ocean Avenue, Venice.

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. 5-03-073 as submitted by the applicant."*

An affirmative vote by a majority of the Commissioners present is needed to pass the motion. 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 a new three-story, 852 square foot second residential unit on a 2,617 square foot lot with an existing one-story single family residence (Exhibit #3). The project site is located in Southeast Venice, just one block east of Eastern Canal and the Venice Canals neighborhood (Exhibit #2). The existing residence on the site was built in 1915, prior to coastal permit requirements. The surrounding neighborhood is comprised of a variety of older and new single family residences that vary in height from a single story to a maximum of thirty feet.

B. Parking – Coastal Access

The Commission has consistently found that a direct relationship exists between residential density, the provision of adequate parking, and the availability of public access to the coast. Section 30252 requires that new development should maintain and enhance public access to the coast by, among other means, providing adequate parking facilities. The proposed project, which would increase residential density on the site from one unit to two units, provides only two on-site parking spaces. Two parking spaces for two residential units is not an adequate supply to maintain and enhance public access to the coast as required by Section 30252.

Section 30252 of the Coastal Act states, in part:¹

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

The requirement for new development to provide adequate parking facilities is based on the premise that the additional parking demands generated by new development, if not met with an adequate parking supply, would increase competition for the limited amount of on-street public parking (and other public parking facilities) that supports the public's ability to access the coast. Public access is adversely affected when there is a shortage of public parking available to coastal visitors. A public parking shortage can be worsened when new development occurs without providing adequate parking facilities.

This is especially true in the project area surrounding the Venice Canals, a truly unique coastal neighborhood and popular visitor destination point for recreational uses [Coastal Development Permit 5-91-584 (City of Los Angeles, Venice Canals Rehab.)]. The project site is located one block east of the Venice Canals neighborhood, and about 1,500 feet inland of the beach (Exhibit #2). The availability of parking on the public streets in the area is reduced by the fact that the streets in the Venice Canals neighborhood are primarily waterways and narrow alleys with no public parking. The streets surrounding the Venice Canals neighborhood, including the streets around the project site, provide the part of the public parking supply that supports public access to this popular coastal area. The limited supply of public on-street parking that may be available for the general public on these surrounding streets, including Ocean Avenue, is also being used by neighborhood residents and their guests. As a result, there is a parking shortage in the area and public access has been negatively impacted by the difficulty in finding a parking space.

¹ Section 30252 of the Coastal Act states, in whole:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

To mitigate this problem, the Commission has consistently conditioned each new single family residence within the Venice Canals neighborhood to provide three on-site parking spaces. The Commission's parking requirement for new single family residences in the neighborhoods surrounding the Venice Canals is two or three spaces, depending on the width of the lot. In this case, the proposed project would be required to provide two on-site parking spaces for a second residential unit, in addition to the existing on-site parking space(s) that serve the existing residential use on the site. The parking policies contained in the Venice Land Use Plan (LUP), certified by the Commission on June 14, 2001, include these parking requirements.

Certified Venice LUP Policy II.A.3 addresses the parking requirements for development in Venice, as follows:

- **Policy II. A. 3. Parking Requirements.** *The parking requirements outlined in the following table shall apply to all new development, any addition and/or change of use. The public beach parking lots and the Venice Boulevard median parking lots shall not be used to satisfy the parking requirements of this policy. Extensive remodeling of an existing use or change of use which does not conform to the parking requirements listed in the table shall be required to provide missing numbers of parking spaces or provide an in-lieu fee payment into the Venice Coastal Parking Impact Trust Fund for the existing deficiency. The Venice Coastal Parking Impact Trust Fund will be utilized for improvement and development of public parking facilities that improve public access to the Venice Coastal Zone.*

Single Family Dwelling: 2 spaces; except projects in the Silver Strand and Venice Canals Residential Subareas, where three spaces are required.

Single Family Dwelling on Lots of 40 or more in width, or 35 feet or more in width if adjacent to an alley: 3 spaces.

Multiple Dwelling: 2 spaces for each dwelling unit.

The project site is a 29-foot wide lot with an existing on-site parking area located on the rear portion of the site next to the alley (Exhibit #3). An existing curb cut and gate allow for vehicles to access the rear yard from the rear alley (Ocean Court). The applicant asserts that no on-site parking is required for the 1915 single family residence, and that the unpaved rear yard is not used as a parking area for the existing single family residence. A site visit by Commission staff, however, confirmed the presence of a parked automobile in the rear yard. The applicant asserts that the vehicle was merely being stored in the yard while she was traveling out of town. In any case, the site does currently provide an on-site parking area for the existing residential use, albeit an unpaved area.

Therefore, there is at least one existing parking space on the site. The proposed three-story residential unit would displace the existing on-site parking supply. The ground floor of the proposed structure is a two-car garage. No other parking supply is being proposed. The proposed two-car garage is not an adequate parking supply for two residential units, and would

not provide the additional parking necessary to maintain and enhance public access to the coast as required by Section 30252 of the Coastal Act. Therefore, the coastal development permit application is denied. In order to conform to the parking requirements of the Coastal Act and the certified Venice LUP, the applicant would have to provide at least two on-site parking spaces for the proposed second residential unit, in addition to the current on-site parking supply.

C. Community Character – Building Height

The City Planning Department granted the applicant's request to exceed the building height limit when it approved the Project Permit (Case No. ZA 2002-4354). The roof and roof deck of the proposed structure would reach 27.5 feet above the elevation of Ocean Avenue (Exhibit #4). A proposed roof access structure would extend up to 35 feet in height. The height limit set forth in the certified Venice LUP is 25 feet for flat-roofed buildings, and thirty feet for buildings with varied rooflines. The proposed roof deck exceeds the applicable 25-foot height limit by 2.5 feet. The house next door at 2504 Ocean Avenue was approved as a 25-foot high single family residence [Coastal Development Permit 5-02-026-W (Lavery)]. Staff is recommending that the Commission deny the permit application because the height of the proposed structure would negatively affect the character and scenic and visual qualities of the community in violation of Sections 30251 and 30253 of the Coastal Act.

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 the unique character of the Southeast Venice neighborhood where the proposed project is located, the Commission limits the height of development. The Commission-imposed height limits are necessary to: 1) preserve the character of the community by keeping new building heights in proportion to the existing residential development; 2) avoid taller denser buildings that would require wider streets to service them; 3) ensure better safety in the event of a fire or other emergency; and, 4) protect the scenic and visual qualities of the unique coastal area.

The Commission has recognized in both prior permit and appeal decisions that the Southeast Venice area, where the proposed project is located, is a unique coastal community. 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 Southeast 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 a 25-foot height limit for development in the Southeast Venice area of Venice.

In 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. The Los Angeles City Council accepted the Commission's suggested modifications and adopted the Venice LUP as the Commission on November 14, 2000 approved it. The Commission officially certified the Venice LUP on June 14, 2001.

The policies and building standards contained in the certified 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 Southeast Venice neighborhood where the proposed project is situated. One change proposed by the City and adopted as part of the certified Venice LUP was the raising of the height limit from 25 to thirty feet for new residential development with varied or stepped-back rooflines in the Southeast Venice area. The 25-foot height limit was maintained and adopted in the LUP for new residential buildings with flat roofs. Roof access structures, with a footprint of one hundred square feet or less, are permitted to exceed the flat roof height limit by no more than ten 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 if the proposed development is found to be consistent with the Coastal Act.

The following LUP policy carries out the requirements of Coastal Act Sections 30251 and 30253 to protect the scenic and visual qualities of the Southeast Venice coastal area. Certified Venice LUP Policy I.A.7.d, which is applicable to the project site located in the Southeast Venice area, states:

• **Policy I. A. 7. d. Oakwood, Milwood, Southeast and North Venice**

Use: Duplexes and multi-family structures.

Density: One unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units per lot.

Replacement Units/Bonus Density: Lots greater than 4,000 square feet can add extra density at the rate of one unit for each 1,500 square feet of lot area in excess of 4,000 square feet on parcels zoned RD1.5, or one unit for each 2,000 square feet of lot area in excess of 4,000 square feet on parcels zoned RD2, if the unit is a replacement affordable unit reserved for low and very low income persons. (See LUP Policies I.A.9 through I.A.16).

Yards: Yards shall be required in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.

Height:

Oakwood, Milwood, and Southeast Venice: Not to exceed 25 feet for buildings with flat roofs; or 30 feet for buildings utilizing a stepped back or varied roofline. The portion that exceeds 25 feet in height shall be set back from the required front yard one foot for every foot in height above 25 feet. Structures located along walk streets are limited to a maximum of 28 feet. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).

The proposed project does not conform to the Southeast Venice area height limit set forth in LUP Policy I.A.7.d above because it proposes a flat roof and an observation deck at the 27.5-foot elevation (above Ocean Avenue), 2.5 feet over the flat roof height limit (Exhibit #4). The proposed 27.5-foot high observation deck would tower over the neighboring buildings in this primarily one and two-story neighborhood. The density issue is discussed in the next section of the staff report.

Other projects recently approved in the project area include:

Coastal Development Permit 5-03-214-W (Lambrecht), at 2419 Ocean Avenue, Venice.

For: Demolition of a detached two-car garage, and construction of a two-story, 24-foot high (with 30-foot high stairway enclosure), detached accessory structure (with a two-car garage on the ground floor and a 470 square foot studio on the second floor) on a 2,700 square foot lot with one existing one-story single family residence.

Coastal Development Permit 5-02-026-W (Lavery), at 2504 Ocean Avenue, Venice.

For: Construction of a 25-foot high, 1,080 square foot second story addition, and add 67 square feet to the ground floor, on an existing one-story 1,013 square foot single family residence. Two parking spaces will be provided on the 2,498 square foot lot.

Sections 30251 and 30253 of the Coastal Act and the above-stated policies of the certified Venice LUP require that the Venice neighborhoods be protected from development that would negatively affect community character and the unique scenic qualities of the coastal area. The proposed structure does not conform to the requirements of the certified LUP or Sections 30251 and 30253 of the Coastal Act. 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. In order to conform to the requirements of the Coastal Act and the certified Venice LUP, the proposed project would have to conform to the current height limit.

D. Residential Density

In order to protect public access to the shoreline and to preserve the character of the Southeast Venice neighborhood, the Commission has consistently limited residential density to two units per lot. Policy I.A.7.d of the certified Venice LUP limits residential density on the project site to one unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units per lot. The project site is a relatively small lot of 2,617 square feet, which has made it difficult for the applicant to design a second residential unit with adequate parking, while also maintaining the existing use (single family residence) on the site.

The City Planning Department granted the applicant's request to build a second residential unit on the 2,617 square foot site when it approved the Project Permit (Case No. ZA 2002-4354). While the small lot size does not meet the certified LUP criteria for a second unit (one unit per 1,500-2,000 square feet of lot area), the Commission's basis for the denial is not the proposed density, but rather the lack of an adequate parking supply for the two resulting units and the height of the proposed structure.

E. Public Access and Recreation

The Coastal Act protects public access and recreation in the Venice coastal area.

Section 30210 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.

Shoreline recreation resources in the Venice area include: Venice Beach, Ballona Lagoon, the Venice Canals, and the Venice walk streets. Venice Beach is a publicly owned sandy beach, which provides direct access to the entire oceanfront shoreline and is readily accessible to pedestrians and bicyclists. The walk streets provide excellent pedestrian access to the beach. It is a goal of the Coastal Commission and the City to protect these public resources. By allowing residential development to ignore the certified LUP policies, i.e. exceed designated height limits and parking requirements, the cumulative effect is an over developed, crowded feel that may discourage public use and enjoyment of the area. Discouraging public access is inconsistent with the certified LUP and the public access policies of the Coastal Act.

A parking deficiency would occur as a result of creating additional residential units without providing any additional parking spaces to serve the new residence. A parking deficiency would reduce the availability of on-street parking for visitors, and as a result, reduce the ability of the public to access the coast. The Commission finds that, the provision of adequate on-site parking is a prerequisite for obtaining a coastal development permit for a new residential unit in Venice. Therefore, the project as proposed cannot be found to be consistent with the public access policies of the Coastal Act.

F. Marine Resources and Water Quality

The Commission has found that Ballona Lagoon and the Venice Canals are sensitive habitat areas that must be protected from negative impacts associated with development.

Section 30240 of the Coastal Act states:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The Venice Canals are located up stream from Ballona Lagoon, within the Ballona Wetlands system. The introduction of urban runoff, including pesticides, garden fertilizers, and runoff from impervious surfaces, can reduce the water quality of the canals which directly impacts the biological productivity of the system. The Ballona Wetlands system is habitat for many species of marine biota, including the state and federally listed endangered least tern. In order to protect the biological productivity of these coastal waters and marine resources, the Commission has consistently required development to incorporate best management practices (BMPs) to improve water quality in the watershed, including the minimization of impervious surfaces on the project site and/or the provision of dry wells or french drains to allow for increased on-site percolation of drainage. The proposed project does not include any such BMPs. Therefore, the project would result in the introduction of additional, unmitigated polluted runoff as described above. Thus, as proposed, the project cannot be found to be consistent with Sections 30230, 30231 and 32040 of the Coastal Act.

G. 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 Commission officially certified the City of Los Angeles LUP for Venice on June 14, 2001.

The certified Venice LUP contains provisions to protect the character of the Venice neighborhoods, including height limits, density limits and parking requirements. 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. By allowing residential development to ignore the certified LUP policies, i.e. exceed designated height limits and not provide adequate parking, the cumulative effect is an over developed, crowded feel that changes the community character and may discourage public use and enjoyment of these coastal areas. Such ignorance of the certified LUP at the present time would make it increasingly difficult to adopt and enforce an LCP that includes measures to protect the unique character of Venice. Therefore, the Commission finds that approval of the proposed development would prejudice the City's ability to prepare a LCP consistent with the policies of Chapter 3 of the Coastal Act, and is not consistent with Section 30604(a) of the Coastal Act.

H. 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.

The applicant's proposed project would have a significant adverse effect on the environment because it lacks adequate parking and is too tall in relation to the surrounding development. There currently exists a viable use on the private property: the existing single family residence. Thus, continuing the status quo at the site is a feasible alternative. If the City continues to be willing to waive the density restrictions on the site, the construction of a second residential unit that provides adequate parking and complies with the height limit also constitutes a feasible alternative to the construction of the proposed project. Thus, denial of the proposed project does not deny the applicant all economically beneficial or productive use of her property or unreasonably limit the owner's reasonable investment-backed expectations of the subject property.

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.

End/cp

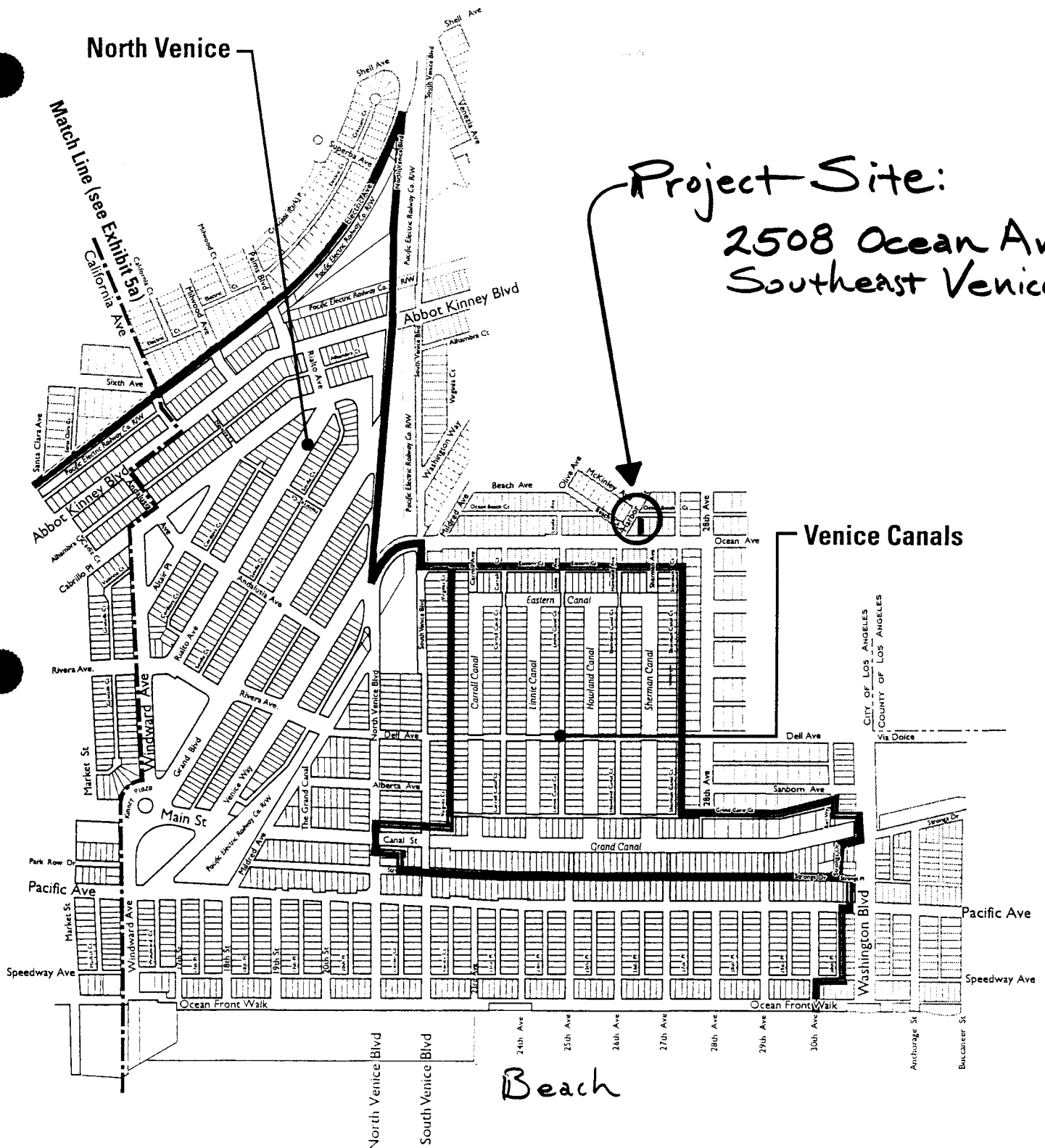
VENICE, CA



Site: 2508 Ocean Avenue

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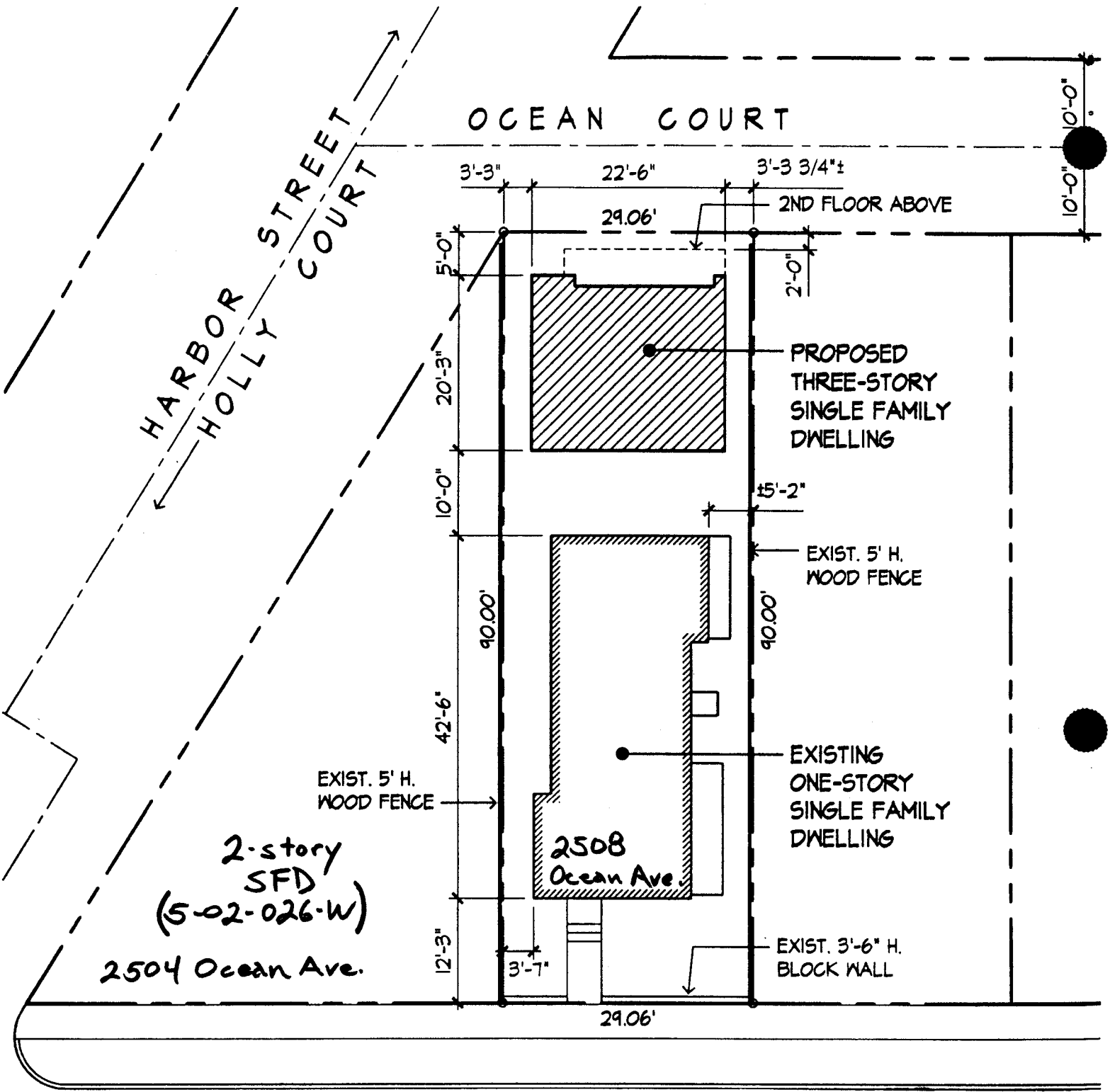


LUP
 Exhibit 5b
 Subarea: North Venice • Venice Canals

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EXHIBIT # 2
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OCEAN AVENUE

LEGAL DESCRIPTION:
LOT 109, TRACT 3533

CASE NO. ZA 2002-4354 (ZAA) (SPP) (MEL)

SECOND DWELLING UNIT
2508 OCEAN AVENUE, VENICE 90291

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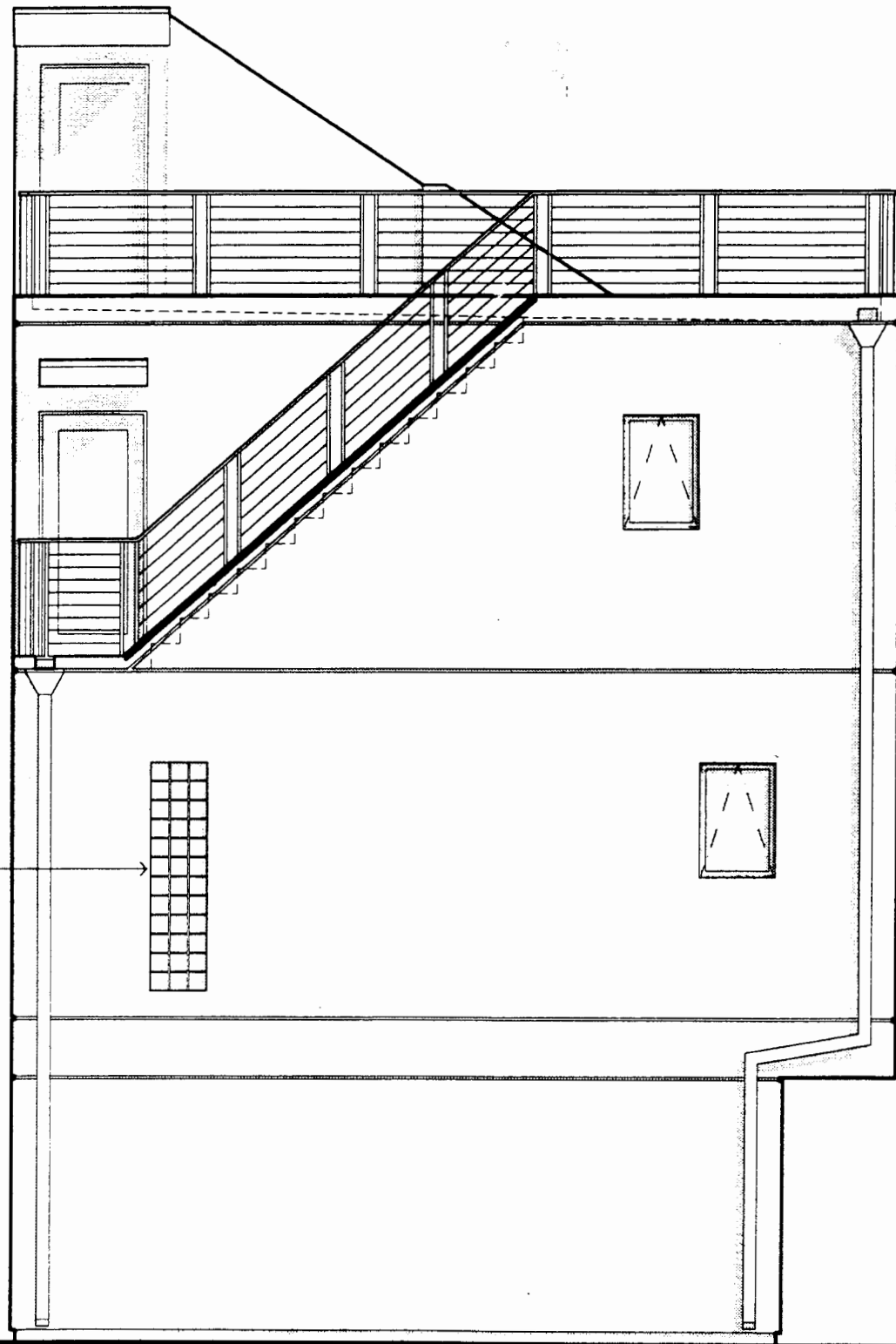
FRED CRAVEA ARCHITECT
1032 North Laurel Avenue Los Angeles CA 90046
Telephone 323 854 2875 FAX 323 654 1522

35' —

27.5' —

3'-0" (TYP.)

GLASS BLOCK WINDOW



Alley →

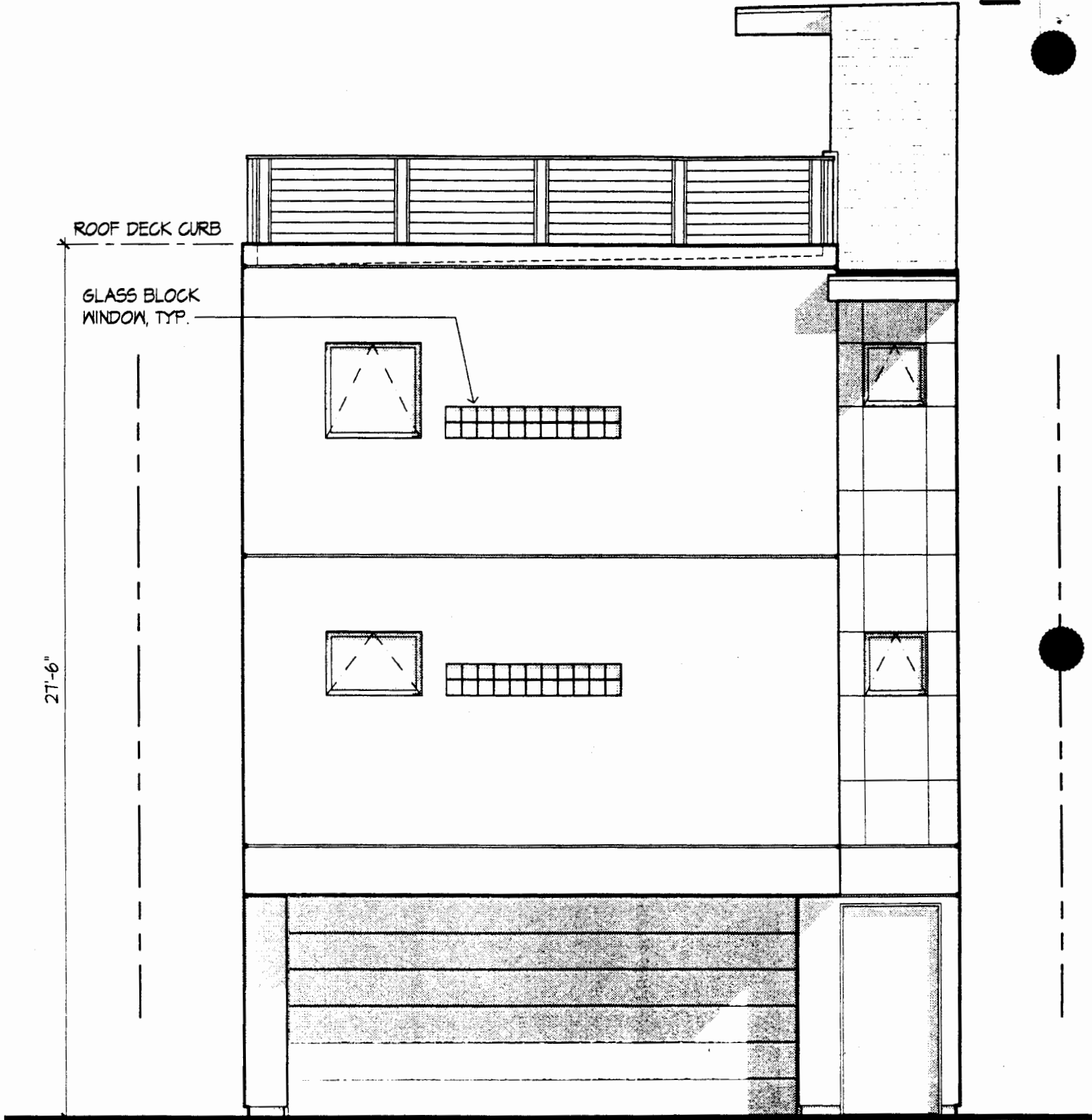
South Elevation

NCI

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35'



East Elevation - Ocean Court

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