

CALIFORNIA COASTAL COMMISSION

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RECORD PACKET COPY**W19a**

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Staff Report: 3/2/2004
Hearing Date: March 17, 2004
Commission Action:



STAFF REPORT: APPEAL
SUBSTANTIAL ISSUE

LOCAL GOVERNMENT: City of Long Beach

LOCAL DECISION: Approval with Conditions

APPEAL NUMBER: A-5-LOB-04-059

APPLICANT: Dr. James Linden **AGENT:** Douglas W. Otto

APPELLANT: Beverly Bristol Milner **AGENT:** James J. Milner

PROJECT LOCATION: 1724 Bluff Place, City of Long Beach, Los Angeles County.

PROJECT DESCRIPTION: Appeal from decision of the City of Long Beach approving Local Coastal Development Permit No. 0309-12 for a new three-story single family residence with standards variances granted for a reduced garage setback, reduced front yard setback, oversized curb cut, reduced street side yard setback from 12th Place, and relief from the lot coverage limit.

SUBSTANTIVE FILE DOCUMENTS:

1. City of Long Beach Certified Local Coastal Program (LCP), 7/22/80.
2. City of Long Beach Planned Development Ordinance PD-5.
3. City of Long Beach Local Coastal Development Permit No. 0309-12 (Exhibit #5).
4. City of Long Beach Local Coastal Development Permit No. 486-86 (1710-18 Bluff Pl.).
5. City of Long Beach Local Coastal Development Permit No. 0308-06 (1700 Bluff Pl.).
6. City of Long Beach Local Coastal Development Permit Application No. 0312-22 (1720 Bluff Pl.).

SUMMARY OF STAFF RECOMMENDATION

The staff recommends that the Commission, after public hearing, determine that the appeal raises **a substantial issue** in regards to the locally approved development's conformity with the City of Long Beach Certified Local Coastal Program and the public access policies of the Coastal Act. The City-approved variances would adversely affect visual access of the shoreline by allowing the building to intrude further into the public's view from the 12th Place overlook than it would if the standards of the certified LCP had been imposed. Therefore, the local action effectively relieved the project of the LCP's primary view protection provision applicable to this property. If the Commission adopts the staff recommendation, a de novo hearing will be scheduled at a future Commission meeting. **The motion to carry out the staff recommendation is on Page Six.**

I. APPELLANT'S CONTENTIONS

Beverly Bristol Milner has submitted to the Commission a valid appeal of the City's approval of Local Coastal Development Permit No. 0309-12 (Exhibit #6). Local Coastal Development Permit No. 0309-12, approved by the City of Long Beach Planning Commission on January 15, 2004, would permit the applicant to build a four-level (three-story with basement) single-family residence on a vacant beach-fronting lot near downtown Long Beach (See Exhibits). The City-approved house would be 39'11" high, including roof deck railings, measured from the average elevation of the site; or 45 feet high as measured from the beach to the top of the roof deck railing (Exhibit #4). The project site is a sloping 1,760 square foot lot situated on the lower half of the bluff face below Bluff Place, the improved public street that currently provides vehicular access to the site and the beach from the top of the bluff (Exhibit #2).

The appeal is attached to this report as Exhibit #6. The appellant contends that the City-approved development would adversely affect visual resources by obstructing a primary public view that exists at the 12th Place street end, on top of the coastal bluff (Exhibit #9, p.2). The 12th Place overlook is a 55-foot wide public street that provides the public with parking and visual access to the beach, the sea, RMS Queen Mary and the port (Exhibit #2). Pedestrian access to the beach below the bluff is provided by Bluff Place and the public beach stairway located at the terminus of 11th Place. The proposed residence, which abuts the west side of the 12th Place right-of-way below the bluff, would block part of the shoreline view from the 12th Place overlook as the building extends about 7.5 feet above the elevation of the viewing area (Exhibit #9).

The appellant also contends that the applicant has not provided, nor has the City required, an adequate analysis of the subterranean stability of the site or a wave run-up study to determine whether the proposed project would be safe.

II. LOCAL GOVERNMENT ACTION

On October 13, 2003, the City of Long Beach Zoning Administrator held a public hearing for the proposed single-family residence. After lengthy testimony regarding parking issues and the proposed development's impacts on public views of the beach and the Queen Mary, the hearing was continued to October 27, 2003. The applicant submitted a revised project design at the October 27, 2003 hearing. The applicant's revised plan eliminated one of the five originally proposed levels of the house. The applicant proposed to offset the reduction in building height with a larger building footprint that encroached into the required yard setbacks. Due to the change in project plans, the City continued the hearing to November 17, 2003.

Several persons raising the view issues spoke in opposition to the redesigned project during the Zoning Administrator's November 17, 2003 hearing. Then the Zoning Administrator approved with conditions the following:

1. City of Long Beach Local Coastal Development Permit No. 0309-12.
2. Standards Variance (garage setback of 3 feet instead of 20 feet).
3. Standards Variance (front yard setback of 6 inches instead of 8 feet, with awnings to the property line).

4. Standards Variance (curb cut of 28 feet instead of not more than 20 feet).
5. Standards Variance (street side yard setback of 1 foot from 12th Place instead of 8 feet).
6. Standards Variance (lot coverage of 83.5% instead of not more than 65%).

The Zoning Administrator's approval included the following conditions to address the project's effect on visual resources:

14. All rooftop mechanical equipment shall be fully screened from public view...
25. Any portion of the building south of the toe of the bluff shall be terraced to reflect the sloping nature of the bluff. Each floor shall be set back from the floor below to create a terraced appearance to the satisfaction of the Zoning Administrator. A revised plan shall be submitted for review and approval.
26. Balconies shall be located at the corners of the building to create a more terraced appearance.
30. The building height shall be limited to 35'6" (thirty-five feet and six inches with an elevation of 54') in three stories with a partial basement and roof deck. The maximum railing height for the roof deck shall be 3'6" for a total building height of 39'. The height shall be measured from grade (average elevation at front top of curb line; however, if the average elevation of the rear property line differs from that of the front top of curb by five feet or more, then grade shall be the plane connecting the average front and rear elevation). In this case, height is measured from the average front and rear elevation.
31. A topographic map shall be provided with contour lines at 1' intervals. The building shall not extend toward the beach further than the toe of the bluff.¹
33. The structure shall be used as a single-family dwelling. The applicant shall record a deed restriction/covenant limiting the use of the home and basement as a single-family residence. The deed restriction shall also include a requirement that limits the height of the building to three stories with a partial basement and roof deck and height of 35'6"/54' elevation as measured and shown on the submitted plans dated October 29, 2003 for Case No. 0309-12. No structures shall be added to the roof of the building including shade structures, patio covers, and/or an increase in the height of the balcony railing.
35. The building height in the 8'0" required street side yard setback off 12th Place shall be a maximum of three (3) feet above the elevation/grade of 12th Place measured from the top of the bluff.
36. The balcony railings shall be constructed of clear glass or other transparent material to the satisfaction of the Zoning Administrator.

On December 1, 2003, both the applicant and the current appellant (Ms. Milner) appealed the Zoning Administrator's action to the City Planning Commission. The applicant requested relief from Condition No. 35 (see above). Ms. Milner's appeal concerned the project's impacts to access and views.

On January 15, 2004, the City of Long Beach Planning Commission held a public hearing for the proposed project. After hearing both sides of the appeals, the Planning Commission denied the current appellant's (Ms. Milner) appeal and granted the applicant the same

¹ "Toe of the Bluff" is a term that is not defined in the certified Long Beach LCP.

variances that were previously approved by the Zoning Administrator, finding that the site is unique because of its relatively small size (Exhibit #5, ps.3-5). The Planning Commission, however, changed Condition Nos. 30 and 35 as shown below in bold text (for new language):

30. The building height shall be limited to **36'5"** ~~35'6"~~ (thirty-six feet and five inches with an elevation of 54' above sea level as shown on the submitted plans) in three stories with a partial basement and roof deck. The maximum railing height for the roof deck shall be 3'6" for a total building height of **39'11"** ~~39'~~. The height shall be measured from grade (average elevation at front top of curb line; however, if the average elevation of the rear property line differs from that of the front top of curb by five feet or more, then grade shall be the plane connecting the average front and rear elevation). In this case, height is measured from the average front and rear elevation.

35. The building height in the 8'0" required street side yard setback off 12th Place **is approved as shown on the submitted plans dated December 1, 2003 shall be a maximum of three (3) feet above the elevation/grade of 12th Place measured from the top of the bluff.**

[See Exhibit #5, Pages 6-10 for all of the Planning Commission's conditions.]

The Planning Commission stated that the variances were requested partially as a way to maintain views of the coast and address the neighbor's concerns with the building's height (Exhibit #5, p.4). In effect, the variances would allow a larger building footprint so the applicant can get more floor area within a four-level home. The record states that the applicant voluntarily deleted a fifth level (nine feet) from the project in an effort to address the neighbor's concerns with the building's height (Exhibit #5, p.4). The appellant would like the project height to be further reduced to preserve more of the public's view from the 12th Place overlook (Exhibit #9).

On February 2, 2004, the City's Notice of Final Local Action for Local Coastal Development Permit No. 0309-12 was received via first class mail in the Commission's South Coast District office in Long Beach. The Commission's ten working-day appeal period was established on February 3, 2004. On February 13, 2004, Commission staff received the appeal (Exhibit #6). The appeal period ended at 5 p.m. on February 18, 2004, with no other appeals received.

III. APPEAL PROCEDURES

After certification of Local Coastal Programs (LCP), the Coastal Act provides for limited appeals to the Coastal Commission of certain local government actions on coastal development permits. Developments approved by cities or counties may be appealed if they are located within the mapped appealable areas, such as those located between the sea and the first public road paralleling the sea or within three hundred feet of the mean high tide line or inland extent of any beach or top of the seaward face of a coastal bluff [Coastal Act Section 30603(a)]. In addition, an action taken by a local government on a coastal development permit application may be appealed to the Commission if the development constitutes a "major public works project" or a "major energy facility" [Coastal Act Section 30603(a)(5)].

The City of Long Beach Local Coastal Program (LCP) was certified on July 22, 1980. Section 30603(a)(1) of the Coastal Act identifies the proposed project site as being in an appealable area by virtue of its location. The proposed project is located between the sea and the first public road paralleling the sea, and within three hundred feet of the beach.

Section 30603 of the Coastal Act states:

- (a) After certification of its Local Coastal Program, an action taken by a local government on a coastal development permit application may be appealed to the Commission for only the following types of developments:
 - (1) Developments approved by the local government between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide line of the sea where there is no beach, whichever is the greater distance.
 - (2) Developments approved by the local government not included within paragraph (1) that are located on tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, stream, or within 300 feet of the top of the seaward face of any coastal bluff.

The grounds for appeal of an approved local coastal development permit in the appealable area are stated in Section 30603(b)(1), which states:

- (b)(1) The grounds for an appeal pursuant to subdivision (a) shall be limited to an allegation that the development does not conform to the standards set forth in the certified Local Coastal Program or the public access policies set forth in this division.

The action currently before the Commission is to find whether there is a "substantial issue" or "no substantial issue" raised by the appeal of the local approval of the proposed project. Sections 30621 and 30625(b)(2) of the Coastal Act require a de novo hearing of the appealed project unless the Commission determines that no substantial issue exists with respect to the grounds for appeal.

Commission staff recommends a finding of substantial issue. If there is no motion from the Commission to find no substantial issue, the substantial issue question will be considered moot, and the Commission will schedule a de novo public hearing on the merits of the application at a subsequent Commission hearing. A de novo public hearing on the merits of the application uses the certified LCP as the standard of review. In addition, for projects located between the first public road and the sea, findings must be made that an approved application is consistent with the public access and recreation policies of the Coastal Act. Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

If the Commission decides to hear arguments and vote on the substantial issue question, proponents and opponents will have three minutes per side to address whether the appeal

raises a substantial issue. The only persons qualified to testify before the Commission at the substantial issue portion of the appeal process are the applicant, persons who opposed the application before the local government (or their representatives), and the local government. Testimony from other persons must be submitted in writing.

The Commission will then vote on the substantial issue matter. It takes a majority of Commissioners present to find that the grounds for the appeal raise no substantial issue. The Commission's finding of substantial issue voids the entire local coastal development permit action that is the subject of the appeal.

IV. STAFF RECOMMENDATION ON SUBSTANTIAL ISSUE

The staff recommends that the Commission determine that **a substantial issue exists** with respect to the grounds for the appeal regarding conformity of the project with the City of Long Beach Local Coastal Program or the public access policies of the Coastal Act, pursuant to Public Resources Code Section 30625(b)(2).

Staff recommends a **NO** vote on the following motion:

MOTION

"I move that the Commission determine that Appeal No. A-5-LOB-04-059 raises No Substantial Issue with respect to the grounds on which the appeal has been filed."

Failure of this motion will result in a de novo hearing on the application and adoption of the following resolution and findings. A majority of the Commissioners present is required to pass the motion.

Resolution to Find Substantial Issue for Appeal A-5-LOB-04-059

The Commission hereby finds that Appeal No. A-5-LOB-04-059 presents a substantial issue with respect to the grounds on which the appeals have been filed under Section 30603 of the Coastal Act regarding consistency with the Certified Local Coastal Plan and/or the public access policies of the Coastal Act.

V. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. Project Description

Local Coastal Development Permit No. 0309-12, approved by the City of Long Beach Planning Commission on January 15, 2004, would permit the applicant to build a four-level single-family residence on a vacant beach-fronting lot near downtown Long Beach (See Exhibits). The project site is a sloping 1,760 square foot lot situated on the lower half of the bluff face below Bluff Place, the improved public street that currently provides vehicular access to the site and the beach from the top of the bluff (Exhibit #2). The project site has 55 feet of beach frontage. A three-car garage is proposed, with access from Bluff Place.

The project site, situated between the public beach and Ocean Boulevard, is in the heart of the densely developed residential neighborhood that exists east of downtown along the Ocean Boulevard scenic corridor. Multi-unit residential buildings occupy most of the properties located on top of the bluff immediately inland of the site. The proposed residence, which extends about 7.5 feet above the elevation of the 12th Place overlook, would obstruct part of the public's view from that overlook (Exhibit #9).

B. Factors to be Considered in Substantial Issue Analysis

Section 30625 of the Coastal Act states that the Commission shall hear an appeal of a local government action unless it finds that no substantial issue exists with respect to the grounds on which the appeal has been filed. The term "*substantial issue*" is not defined in the Coastal Act or its implementing regulations. Section 13115(b) of the Commission's regulations simply indicates that the Commission will hear an appeal unless it finds that the appeal raises no significant question as to conformity with the certified LCP or there is no significant question with regard to the public access policies of Chapter 3 of the Coastal Act. In previous decisions on appeals, the Commission has been guided by the following factors.

1. The degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the Coastal Act;
2. The extent and scope of the development as approved or denied by the local government;
3. The significance of the coastal resources affected by the decision;
4. The precedential value of the local government's decision for future interpretations of its LCP; and,
5. Whether the appeal raises local issues, or those of regional or statewide significance.

Even when the Commission chooses not to hear an appeal, appellants nevertheless may obtain judicial review of the local government's coastal permit decision by filing petition for a writ of mandate pursuant to Code of Civil Procedure, Section 1094.5. Staff is recommending that the Commission find that **a substantial issue** exists for the reasons set forth below.

C. Substantial Issue Analysis

As stated in Section III of this report, the grounds for appeal of a coastal development permit issued by the local government after certification of its Local Coastal Program (LCP) are specific. In this case, the local coastal development permit may be appealed to the Commission on the grounds that it does not conform to the certified LCP or the public access policies of the Coastal Act. The Commission must then decide whether a substantial issue exists in order to hear the appeal.

The primary issue raised by the appeal is the project's effect on the public view from the 12th Place bluff top overlook (Exhibit #6). The 12th Place overlook is a 55-foot wide public street that provides the public with parking and visual access to the beach, the sea, RMS Queen Mary and the port (Exhibit #2). The proposed residence, which abuts the west side of the 12th Place right-of-way below the bluff, would block part of the shoreline view from the 12th Place overlook (Exhibits #8&9). The City's findings state that the approved building would extend about 7.5 feet above the elevation of the bluff top viewing area (Exhibit #5, p.3).

Commission staff recommends a finding of substantial issue because the locally approved development is not in conformity with the City of Long Beach LCP and the public access policies of the Coastal Act, as asserted in the appeal. The certified LCP identifies the street ends in the project area, and specifically the 12th Place overlook, as coastal accessways and public viewing areas. The implementing ordinances (LIP) portion of the certified LCP contains specific building design standards, particularly building setback requirements, that were developed by the City and certified by the Commission to protect and enhance the public views from the street ends. Although the certified LCP provide for variances from those building standards, such variances are only allowable where they would have no adverse effect on, among other things, visual characteristics. The setback variances that the City granted the proposed project in this case would adversely affect visual access of the shoreline by allowing the building to intrude further into the public's view (from the 12th Place overlook) than it would if the standards of the certified LCP had been imposed (Exhibit #8). The local action effectively relieved the project of the LCP's primary view protection provision applicable to this property. Therefore, the granting of those variances raises an issue with respect to the approval's compliance with the certified LCP.

LCP Policy

The certified LCP identifies the 12th Place overlook as a coastal accessway and a public viewing area (Exhibit #6, p.7). The project site and the 12th Place overlook are situated in LCP Area A. The Policy Plan Summary for LCP Area A, on LCP Page III-A-8, states:

"A principle objective of this plan is to improve public access to the beach in Area A. This will be accomplished in part by improvements to the street ends south of

Ocean Boulevard. These will be developed as mini-parks for viewing and/or beach access purposes." [See Exhibit #6, p.6].

Page III-A-10 of the certified LCP states:

"The park-like street end development (described above) will serve both recreation and visitor serving needs by providing access to the beach, as well as quiet sitting and viewing areas." [See Exhibit #6, p.8].

The public beach stairway at 12th Place was demolished about ten years ago, but the City is currently planning to improve the 12th Place street end for public access as called for by the LCP. Bluff Place and the public beach stairway located at the terminus of 11th Place currently provide public pedestrian access to the beach below the 12th Place overlook (Exhibit #2).

LCP Policy Implementation

Page III-A-12 of the certified LCP describes the implementation of the Policy Plan for LCP Area A, as follows:

"VISUAL RESOURCES AND SPECIAL COMMUNITIES

Measures for implementation of this policy plan adequately protect and enhance the visual resources of Area A, particularly those dealing with setbacks, view protection, shadow control, and development of street ends." [Exhibit #6, p.10].

The certified LCP then refers to the LCP implementing ordinances (LIP), which include the Ocean Boulevard Planned Development District (PD-5, formerly PD-1). The Ocean Boulevard Planned Development District, which is attached to this report as Pages 11 through 17 of Exhibit #6, contains the specific use and building design standards that protect and enhance the public views from the street ends situated south of Ocean Boulevard. These LIP standards include setback requirements, height limits, density limits, open space requirements, terracing requirements, and lot coverage and floor area ratio limits. The Ocean Boulevard Planned Development District also includes a special incentive provision to encourage lot assembly to allow for higher buildings and densities in exchange for greater visibility of the ocean and more open space (Exhibit #6, p.11). The project site and the abutting vacant lot (1720 Bluff Place: Local Coastal Development Permit Application No. 0312-22) would be prime candidates for such a consolidation.

The Ocean Boulevard Planned Development District allows for variances only if the City finds that the variance meets the intent of the original standards and is consistent with the overall goals and objective of the plan. For development in the coastal zone, the Ocean Boulevard Planned Development District and the certified Long Beach Zoning Ordinance (Section 21.25.306.D) require the City to make the following finding if it grants a variance:

"In the coastal zone, the variance will carry out the local coastal program and will not interfere with physical, visual and psychological aspects of access to or along the coast." [See also Exhibit #6, p.11].

Substantial Issue

The City approved the following variances which would allow the project to have a larger building footprint than would be required by conforming to the LCP building standards:

- Garage setback of 3 feet instead of 20 feet.
- Front yard (beach) setback of 6 inches instead of 8 feet, with awnings to the property line.
- Street side yard setback of 1 foot from 12th Place instead of 8 feet.
- Lot coverage of 83.5% instead of not more than 65%.

These variances would not raise a public view issue if they did not "*interfere with physical, visual and psychological aspects of access to or along the coast.*" However, the variance from the eight-foot 12th Place side yard setback requirement, and the variance from the eight-foot front yard beach setback requirement, would adversely affect visual access of the shoreline by allowing the proposed building to intrude into the setback area and several feet further into the public's view from the 12th Place overlook (Exhibit #8). These variances would relieve the project of the LCP's primary view protection provision that is applicable to this property, thus violating the intent and overall goal of the certified LCP to protect the public's view from the street end. The proposed development would block less of the public's view if it were required to conform to the setback requirements set forth in the certified LCP. Therefore, a substantial issue exists with respect to the locally approved development's conformity with the City of Long Beach Certified LCP.

The appeal also asserts that a lower building height could reduce the proposed project's impact on the public view from the 12th Place overlook. This is true; however, the City did not grant any variance to the height limit. The City determined that the project site is within Subarea Two of the Ocean Boulevard Planned Development District, where the height limit is 45 feet (Exhibit #6, p.16). Condition No. 30 of Local Coastal Development Permit No. 0309-12 states that the building height shall be limited to 36'5" with an elevation of 54' above sea level as shown on the submitted plans (Exhibit #6, p.9). Therefore, the 36'5" height of the City-approved building is not a substantial issue because it conforms to the height limit set forth by the certified LCP. It must be noted, however, that the City-approved setback variances would not have resulted in as much public view obstruction if the height of the proposed building (including the roof deck railings) had been limited so as to not exceed the elevation of the 12th Place overlook.² Since the City granted the applicant the setback variances, and approved a building that extends about ten feet (7.5 feet plus roof deck railings) above the elevation of the 12th Place overlook, the resulting obstruction of the public view is a substantial issue.

The appeal also raises a substantial issue in regards to the project's conformity with the public access policies of the Coastal Act.

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

² The applicant's site survey indicates that the elevation of the 12th Place overlook is 46.9 feet above datum.

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.

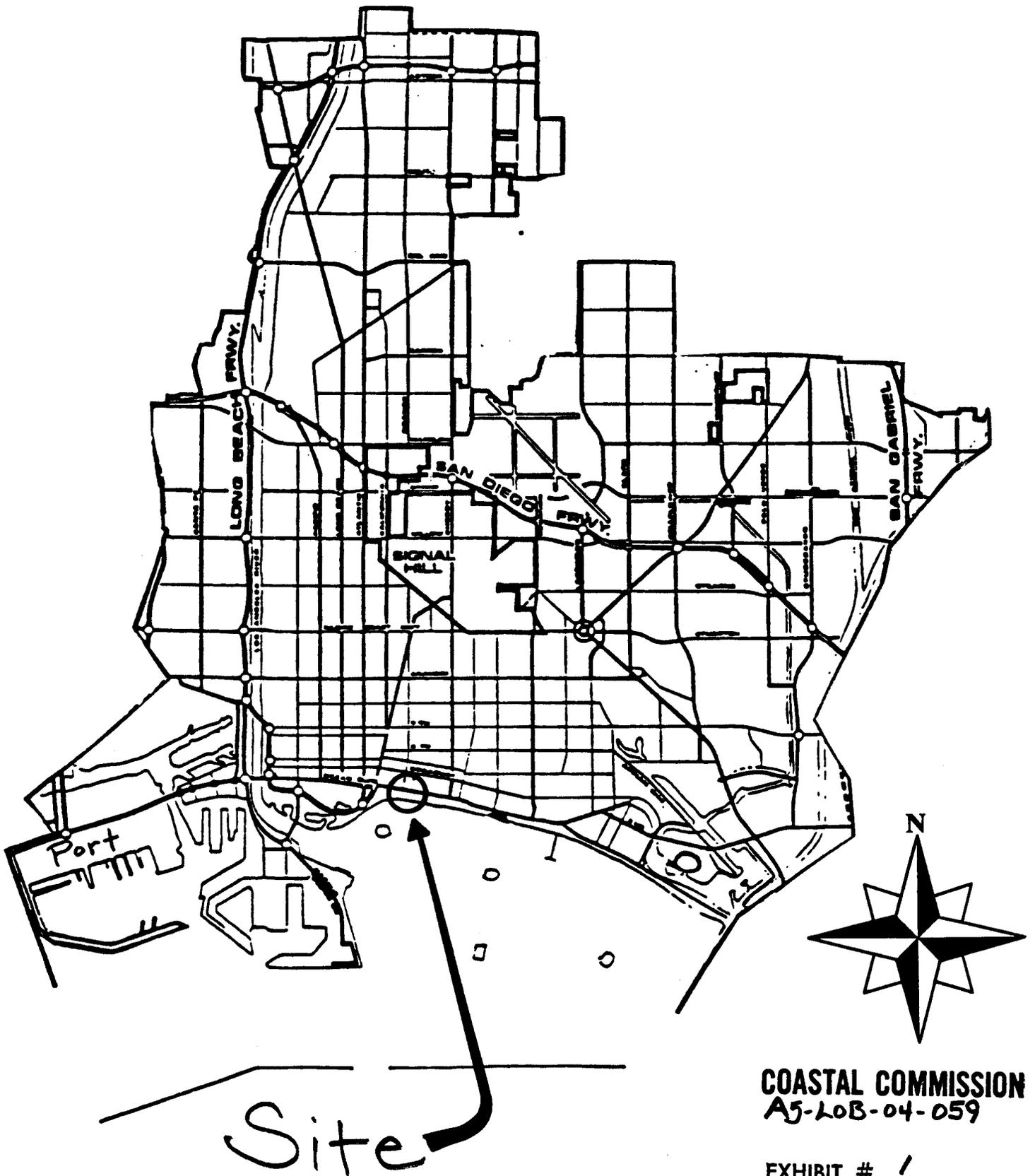
The provision of the required building setback is necessary to provide an adequate buffer between the proposed residence and the 12th Place beach accessway. By allowing the proposed building to be set back only one foot from the 12th Place right-of-way the local approval could interfere with existing public access as well as the Department of Parks and Recreation's plans to improve the public right-of-way as a mini-park (as called for by the certified LCP). Buffer areas are usually provided between public recreation areas and private residences in order to reduce conflicts that may arise between residents and park users/beach goers. The residential yard area within the required setback would typically provide part of the buffer area, while additional buffer area would be provided on the public property. For example, a public park bench would be sited further than one or two feet from the window of a private residence. The certified LCP requires that a side yard setback be provided in order to allow for an adequate buffer area between the public and private uses. Therefore, the variance from the eight-foot 12th Place side yard setback requirement raises substantial issue in regards to the project's conformity with the public access policies of the Coastal Act.

The appellant also contends that the applicant has not provided, nor has the City required, an adequate analysis of the subterranean stability of the site or a wave run-up study to determine whether the proposed project would be safe. The certified LCP, on Page III-A-12, does require that construction on the face of the bluff will require that studies be made by each developer of soil stability conditions (Exhibit #6, p.10). The City record does not include such a study. Therefore, a substantial issue exists with respect to the locally approved development's conformity with the City of Long Beach Certified LCP.

In conclusion, the proposed development and the local coastal development permit for the proposed development do not conform to the requirements of the City of Long Beach certified LCP and the public access policies of the Coastal Act. The City may grant variances to the standards set forth by the certified LCP, but only if it does not result in adverse impacts to physical, visual and psychological aspects of coastal access. In this case, the proposed project, as approved and conditioned by City of Long Beach Local Coastal Development Permit No. 0309-12, would have an adverse effect on visual resources and coastal access. Therefore, the Commission finds that the appeal raises **a substantial issue**.

End/cp

City of Long Beach



COASTAL COMMISSION
A5-LOB-04-059

EXHIBIT # 1

PAGE 1 OF 1

Next >>

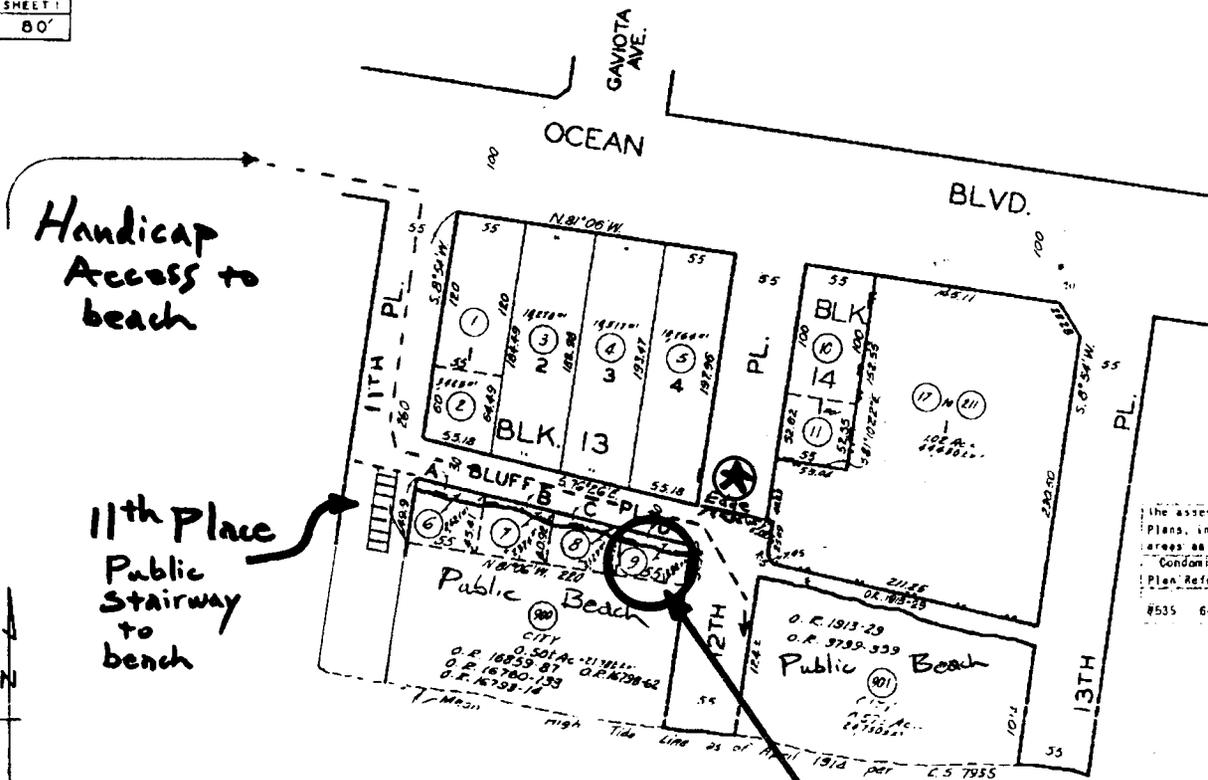
View Enlarged Map

View Printing Instructions

County of Los Angeles: Rick Auerbach, Assessor

7265 16
SHEET 1
SCALE 1" = 80'

REVISED 6/11/17
TODAY'S 7:52
REVISED 7:52
TODAY'S 7:52



the assessment of units in the following Condominium Plans, includes all rights and interests in the common areas as set forth in deeds of record.

Condominium Plan Reference	Tract No.	Blk.	Total Units	Subdivision of Airspace
#535	6-17-75	32381	--	Shs. 2 to 10

RESUBDIVISION OF BLOCKS 13 AND 14 OF THE
ALAMITOS BEACH TOWNSITE

CONDOMINIUM
TRACT NO. 32381
M. B. 852-28-29

COASTAL COMMISSION
AS-LOB-04-059

EXHIBIT # 2
PAGE 1 OF 1

CODE
5500

FOR PREV. ASSMT. SEE:
7265-16

LANDS AS SHOWN ON CITY
ENGINEERS MAP OF LONG BEACH

JUNE 9, 1958 NO. 6-1774 1-4

1724 Bluff Place
Site

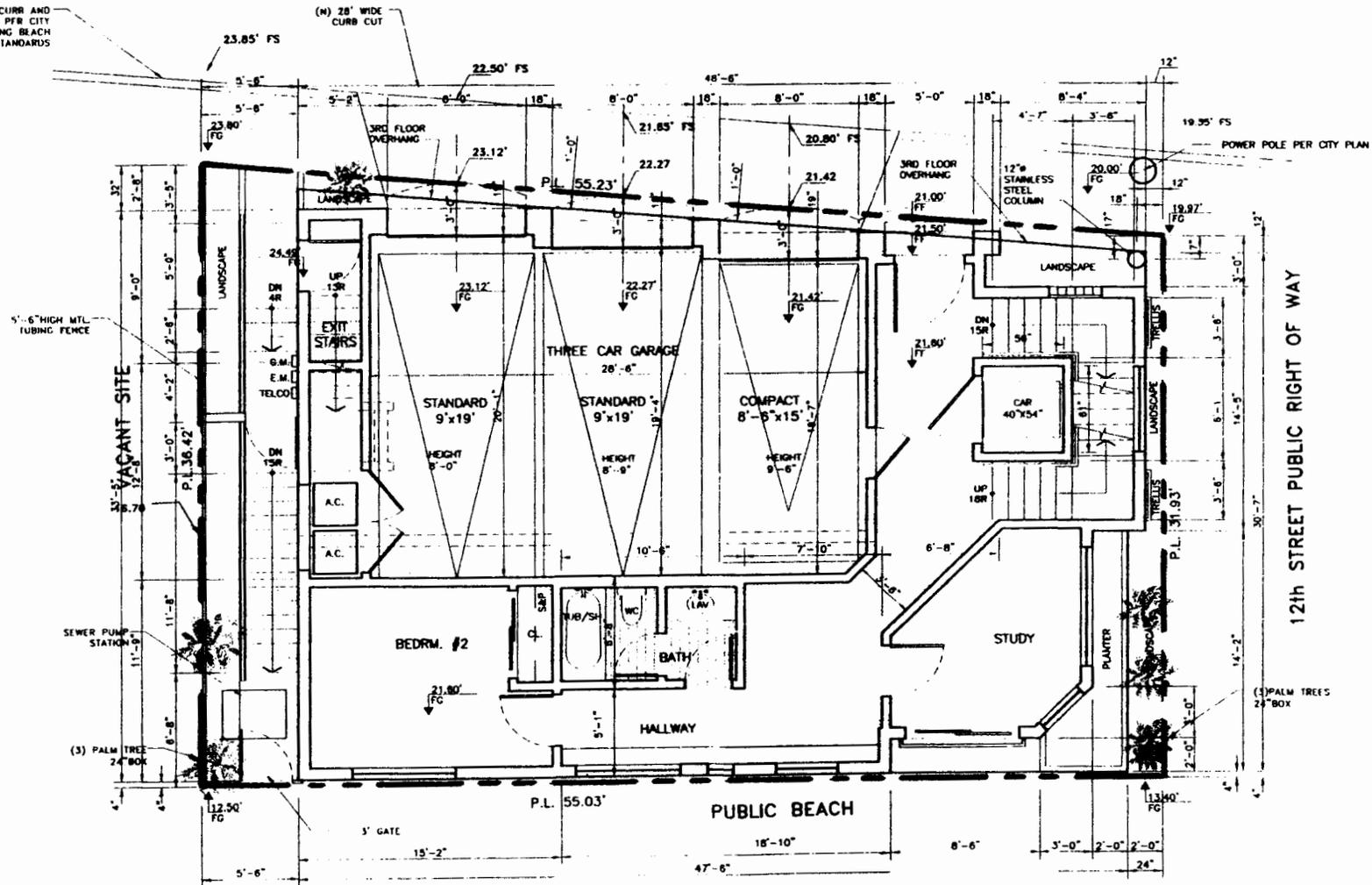
★: Public View of shoreline - See Exhibits # 8 & 9.

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.

CL OF BLUFF PLACE

CL OF 12th. STREET

(N) CURR AND GUTTER PER CITY OF LONG BEACH STANDARDS



12th STREET PUBLIC RIGHT OF WAY

Lot Area ≈ 1,760 sq.ft.

**SITE PLAN AND
FIRST FLOOR PLAN**

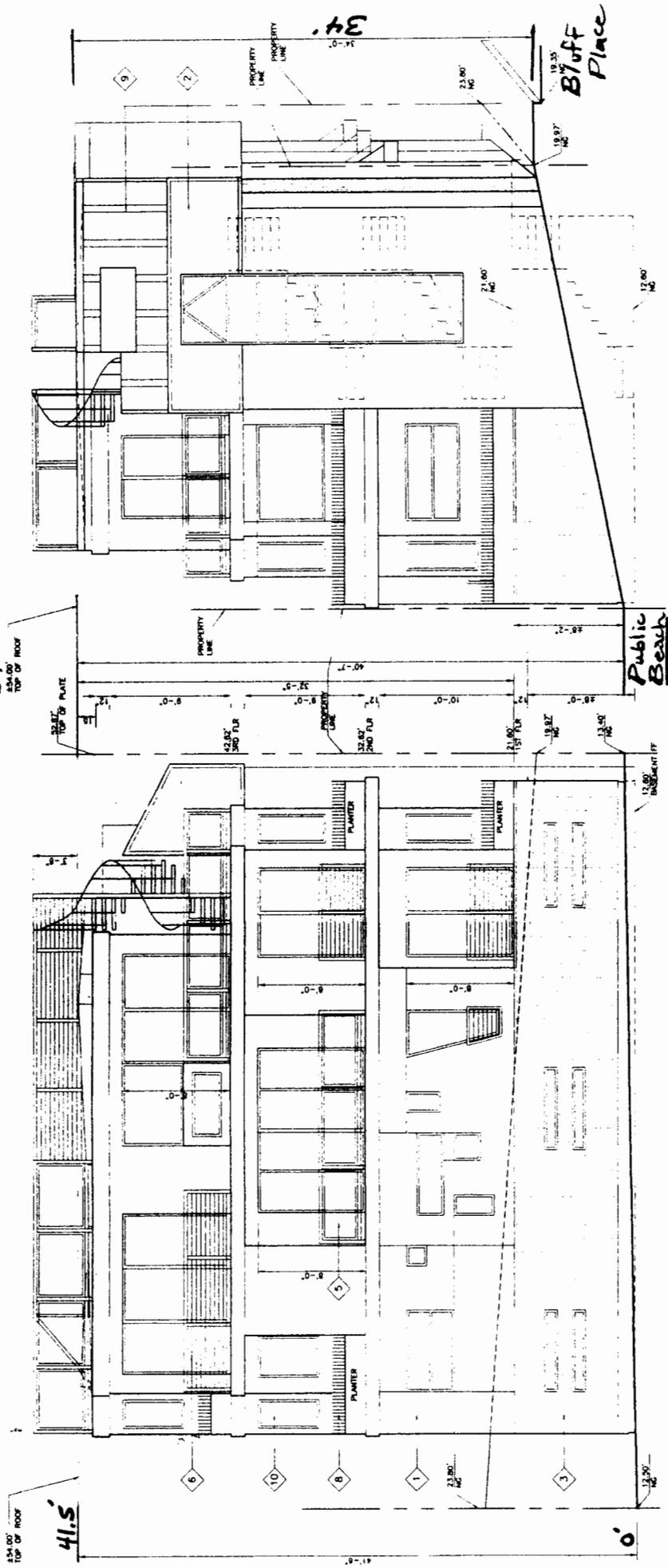
FIRST FLOOR AREAS
GARAGE: 873 SQ. FT.
LIVING: 686 SQ. FT.

NOTE:
F.S. PER BLUFF STABILIZATION PLAN
DATED OCTOBER 3, 2003 (NOT PLAN)



COASTAL COMMISSION
A5-LOB-04-059

EXHIBIT # 3
PAGE 1 OF 1



REAR ELEVATION
View from beach

LEFT ELEVATION
12th Place

COASTAL COMMISSION
AS-LOB-04-059

EXHIBIT # 4

PAGE 1 OF 1



CITY OF LONG BEACH

DEPARTMENT OF PLANNING & BUILDING

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802 • FAX (562)570-6068

NOTICE OF FINAL LOCAL ACTION

RECEIVED
South Coast Region

Case No.: 0309-12 FEB 2 - 2004

Project Location: 1724 Bluff Place CALIFORNIA COASTAL COMMISSION

Applicant: Suburban Partners, LLC
c/o RPP Architects - Bozena Jaworski
3837 E. 7th Street
Long Beach, CA 90804

Permit(s) Requested: Standards Variance
Local Coastal Development Permit

Project Description: Appeal of the Zoning Administrator's decision to conditionally approve a Local Coastal Development Permit and Standards Variance for a reduced garage setback, reduced front yard setback, oversized curb cut, reduced street side yard setback from 12th Place and to exceed the lot coverage for construction of a new three-story single family home with a partial basement and roof deck. An appeal has been filed by the applicant for condition of approval number 35 restricting the building height in the street side yard setback off 12th Place. Additionally, the action to approve the requests has been appealed by a second party.

Local action was taken by the: Planning Commission on:
January 15, 2004

Decision: Deny the appeal by a second party. Overturn the decision of the Zoning Administrator for Condition No. 35 and approve the plans as submitted.

Local action is final on: January 25, 2004

This project is in the Coastal Zone and IS appealable to the Coastal Commission.

"If you challenge the action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or issues raised via written correspondence delivered to the (public entity conducting the hearing) at or prior to the public hearing."

See other side for City of Long Beach and California Coastal Commission appeal procedures and time limits.


Greg Carpenter
Zoning Administrator

Lynette Ferenczy, Planner IV
Phone No.: (562)570-6273
COASTAL COMMISSION
A5-LOB-04-059
EXHIBIT # 5
PAGE 1 OF 10

Attachments

Council District: 2

LOCAL COASTAL DEVELOPMENT PERMIT
FINDINGS

Case No. 0309-12

1. THE PROPOSED DEVELOPMENT CONFORMS TO THE CERTIFIED LOCAL COASTAL PROGRAM INCLUDING BUT NOT LIMITED TO ALL REQUIREMENTS FOR REPLACEMENT OF LOW AND MODERATE-INCOME HOUSING; AND

A positive finding can be made for this item.

The site is located in Area A (The Bluffs) of the Local Coastal Plan. The zoning designation for this site is the Ocean Boulevard Planned Development District (PD-5), subarea 2. This subarea is designated for multifamily residential development with a density of up to 54 dwelling units per acre. The subject site, a 1,881 square foot lot, would allow two dwelling units. The applicant is proposing a four-level story single family home with a partial basement, roof deck and three-car garage. The home is three stories measured from the average elevation of the lot at Bluff Place.

The proposed home is consistent with the density, parking and height requirements of the zone. Standards Variance requests have been submitted for setbacks into the front and street side yard, oversized curb cut, reduced garage setback and to exceed the lot coverage.

2. THE PROPOSED CONFORMS TO THE PUBLIC ACCESS AND RECREATION POLICIES OF CHAPTER 3 OF THE COASTAL ACT. THE SECOND FINDING APPLIES ONLY TO DEVELOPMENT LOCATED SEAWARD OF THE NEAREST PUBLIC HIGHWAY TO THE SHORELINE.

A positive finding can be made for this item.

Chapter 3 of the Coastal Act deals with the public's right to use of beach and water resources for recreational purposes. The chapter provides the basis for state and local governments to require beach access dedication and to prohibit development, which restricts public access to the beach and/or water resources

The site is located south of Bluff Place with frontage on the beach. The proposed single family home will not block access to the beach or recreational resources. The home has been approved with reduced front and street side yard setbacks, and exceeds the lot coverage requirements in an effort to minimize the impact on views from the top of the bluff at 12th Place. PD-5 allows a height of four stories and 45' above Ocean Boulevard grade, but also requires any building south of the toe of the bluff to be terraced to reflect the sloping nature of the bluff.

The building height has been designed to be approximately 7.5' above the elevation of 12th Place at the top of the bluff. The railing on the proposed roof deck is above the elevation of 12th Place per the conditions of approval. The portion of the building in the required 8'0" street side yard setback will be approximately 3'0" above the elevation of Bluff Place.

STANDARDS VARIANCE FINDINGS

Pursuant to Chapter 21.25, Division III of the Long Beach Municipal Code, the variance procedure is established to allow for flexibility in the Zoning Regulations. This flexibility is necessary to because not all circumstances relative to all lots can be foreseen and evaluated in the writing of such regulations. In order to prevent abuse of this flexibility, certain findings of fact must be made before any variance can be granted. These findings have been incorporated in the Long Beach Municipal Code.

A. The site or the improvements on the site are physically unique when compared to other sites in the same zone.

The site is physically unique due to its shape, size and slope when compared to other sites in PD-5. The site is approximately 1,881 square feet in area with a depth of 32' to 36.4' and a slope of up to nine feet from front to back and of up to four feet from side to side. It is the last lot located on Bluff Place with the beach to the south, a vacant lot to the north, and an unimproved street, 12th Place, to the east. This site is also the smallest of the four lots located on the south side of Bluff Place. These four lots are all unique when compared to other site in PD-5, which are predominately large sites from 10,000 square feet to over to an acre, with frontage on Ocean Boulevard and the beach. Many of these sites have been developed with multifamily high-rise or mid-rise developments. Although the site is similar to three other lots on Bluff Place, it is very unique when compared to other site in the Ocean Boulevard Planned Development District.

B. The unique situation causes the applicant to experience hardship that deprives the applicant of a substantial right to use of the property as other properties in the same zone are used and will not constitute a grant of special privilege inconsistent with limitations imposed on similarly zoned properties or inconsistent with the purpose of the zoning regulations.

The unique lot size, shape and topography create a hardship in developing this site in strict compliance with the zoning regulations. In 1989 the second lot on Bluff Place, (1710 and 1718), was developed with a four story, two-unit residence (Case 486-86) with two floors above Bluff Place and two below grade of the street. The first lot at the top of Bluff Place was approved by the City Planning Commission for construction of a five-story, two-unit condominium (Case No 0308-06) with three floors above Bluff Place and two below grade. This approval included a request for a subdivision map, Local Coastal Development Permit, and Standards Variances. The variance requests were for a reduced street side yard setback from 11th Place, a reduced front yard setback, oversized curb cut, reduced garage setback, projections into the side yard setback and a request to

not terraced the first three floors of the building. The applicant's requests for a reduced garage setback and curb cut width are similar to those approved for the first two lots on Bluff Place. The requests for the reduced front yard setback, street side yard setback and lot coverage area partially a result of addressing neighborhood concerns to reduce the height to maintain views of the coast.

The lot depth prohibits compliance with the garage setback. Therefore, if this variance was not granted the property could not be developed. Additionally, the other two sites have also been granted reduced garage setbacks and oversized curb cut widths. Bluff Place is painted red along the entire south side of the street, therefore approval of a wider curb cut does not eliminate street parking and allows more on-site parking in a parking impacted area.

The requests for a reduced front and street side yard setback and to exceed the lot coverage are a result of the applicant's attempts to address the neighbors concerns regarding the height of the building. The original plans were for a four story building with a height of 42'0" to the top of the flat roof. At the previous zoning hearing the neighbors expressed concern over the building height and loss of views. The applicant then redesigned the home with a lower height and added a partial basement below grade, with three floors above grade plus a roof deck. Thus, the building height was lowered by approximately 9' and one story from four stories and a height of 42'/48.1' to three stories plus roof deck and a height of 33'/36'5.

C. The variance will not cause substantial adverse effects upon the community; and

The variance request for the garage setback and curb cut width are not expected to cause any adverse effects upon the community. These rights are currently enjoyed by the other two sites on Bluff Place and will allow one additional off-street parking space in a parking impacted area.

The request to exceed the permitted lot coverage and for a reduced front and street side yard setback are partially a result of lowering the height of the home in an attempt to lessen the impact on views of the surrounding property owners and the public from 12th Place and Ocean Boulevard. By decreasing the height of the home the applicant has designed a wider house resulting in a greatly reduced front yard setback, street side yard setback and excessive lot coverage. The adverse effects as a result of approval of these requests for a shorter, wider and larger building may be considered less than a taller, narrower, and smaller building with code complying setbacks and lot coverage.

The following discussion presents the Standards Variances requested and staff response:

- Building front yard setback of 6" (instead of not less than 8'0") and lot coverage of 83.5% (instead of 65%);

- The greatly reduced front yard and street side yard setback allow a larger building than the previous building, but at a lower height. This design addresses the concerns of the neighbors related to view blockage from the top of the Bluff. Lot Coverage of 83.5% (instead of not more than 65%)

PD-5 limits lot coverage to 54% or 1,223 square feet. Due to the extremely small lot size and reduced front and street side yard setback, the proposed structure exceeds the lot coverage. The lot coverage is reflective on the mass of the building and in reducing the building height the applicant redesigned the home to become larger and wider resulting in an increased lot coverage calculation.

- Building interior side yard setback of 1'0" of 12th Place (instead of not less than 8'0")

See
Cond.
#35

(As stated above the reduced street side yard setback is limited to no more than 3'0" above the grade of 12th Place at the top of the bluff so that views will be minimally blocked.

- Curb cut width of 28'0" (instead of 20'0")

Staff recommends approval of the wider curb cut to provide access to three independently accessible side-by-side parking spaces. The street curb is currently red therefore the approval of a wider curb cut does not remove any street parking spaces and provides for an additional off-street parking space.

- Garage setback of 3'0" (instead of 20'0")

Due to the shallow lot depth of approximately 34' and a reduced garage setback enjoyed by the neighboring property owner on a similar sized lot, approval is recommended for this request. As this is the smallest and most shallow lot of the four properties on Bluff Place, the garage setback is also the smallest.

D. In the Coastal Zone, the variance will carry out the local coastal program and will not interfere with physical, visual and psychological aspects to or along the coast.

The project is located in the Coastal Zone. These findings are attached

COASTAL COMMISSION

EXHIBIT # 5
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**LOCAL COASTAL DEVELOPMENT PERMIT
(Revised per Planning Commission Action)
STANDARDS VARIANCES
CONDITIONS OF APPROVAL
CASE 0309-12
Date: January 15, 2004**

1. This permit and all development rights hereunder shall **terminate one year** from the effective date (final action date or, if in the appealable area of the Coastal Zone, 21 days after the local final action date) of this permit unless construction is commenced or a time extension is granted, based on a written and approved request submitted prior to the expiration of the one year period as provided in Section 21.21.406 of the Long Beach Municipal Code.
2. The **code exception(s) approved** for this project is (are) as follows:
 - a. **A garage setback of 3'0" (instead of not less than 20'0");**
 - b. **A front yard setback of 6" (instead of 8'0") with awnings up to the front property line;**
 - c. **A curb cut width of 28'0" (instead of 20'0");**
 - d. **A street side yard setback of 1'0" from 12th Place (instead of 8'0");**
and
 - e. **Lot coverage of 83.5% (instead of not more than 65%).**
3. This permit shall be invalid if the owner(s) and/or applicant(s) have failed to return **written acknowledgment** of their acceptance of the conditions of approval on the *Conditions of Approval Acknowledgment Form* supplied by the Planning Bureau. This acknowledgment must be submitted within 30 days from the effective date of approval (final action date or, if in the appealable area of the Coastal Zone, 21 days after the local final action date). Prior to the issuance of a building permit, the applicant shall submit a revised set of plans reflecting all of the design changes set forth in the conditions of approval to the satisfaction of the Zoning Administrator.
4. If, for any reason, there is a **violation of any of the conditions** of this permit or if the use/operation is found to be detrimental to the surrounding community, including public health, safety or general welfare, environmental quality or quality of life, such shall cause the City to initiate revocation and termination procedures of all rights granted herewith.
5. In the event of **transfer of ownership** of the property involved in this application, the new owner shall be fully informed of the permitted use and development of said property as set forth by this permit together with all conditions, which are a part thereof. These specific requirements must be recorded with all title conveyance documents at time of closing escrow.
6. All conditions of approval **must be printed** verbatim on all plans submitted for plan review to the Planning and Building Department. These conditions must be printed on the site plan or a subsequent reference page.

7. The Director of Planning and Building is authorized to make **minor modifications** to the approved design plans or to any of the conditions of approval if such modifications shall not significantly change/alter the approved design/project. Any major modifications shall be reviewed by the Site Plan Review Committee or Planning Commission, respectively.
8. Site development, including landscaping, shall conform to the approved plans on file in the Department of Planning and Building. At least **one set of approved plans** containing Planning, Building, Fire, and, if applicable, Redevelopment and Health Department stamps **shall be maintained at the job site**, at all times for reference purposes during construction and final inspection.
9. Where feasible, all landscaped areas shall be planted with **drought tolerant plant materials**. All landscaped areas shall be provided with water conserving automatic irrigation systems designed to provide complete and adequate coverage to sustain and promote healthy plant life. The irrigation system shall not cause water to spray or flow across a public sidewalk.
10. All landscaped areas must be maintained in a neat and healthy condition, including public parkways and street trees. Any dying or dead plant materials must be replaced with the minimum size and height plant(s) required by Chapter 21.42 (Landscaping) of the Zoning Regulations. At the discretion of city officials, a yearly inspection shall be conducted to verify that all irrigation systems are working properly and that the landscaping is in good healthy condition. The property owner shall reimburse the City for the inspection cost as per the special building inspection specifications established by City Council.
11. Exterior security bars and roll-up doors applied to windows and pedestrian building entrances shall be prohibited.
12. Any graffiti found on site must be removed within 24 hours of its appearance.
13. **Energy conserving equipment**, lighting and construction features shall be utilized on the building.
- 14.** All **rooftop mechanical equipment** shall be fully screened from public view. Said screening must be architecturally compatible with the building in terms of theme, materials, colors and textures. If the screening is not specifically designed into the building, a rooftop mechanical equipment plan must be submitted showing screening and must be approved by the Director of Planning and Building prior to the issuance of a building permit.
15. Adequately sized **trash enclosure(s)** shall be designed and provided for this project as per Section 21.46.080 of the Long Beach Municipal Code. The designated trash area shall not abut a street or public walkway and shall be placed at an inconspicuous location on the lot.

16. All structures shall conform to the Long Beach Building Code requirements. Notwithstanding this subject permit, all other required permits from the Building Bureau must be secured.
17. Separate building permits are required for signs, fences, retaining walls, trash enclosures, flagpoles, pole-mounted yard lighting foundations and planters.
18. Approval of this development project is expressly conditioned upon payment (prior to building permit issuance or prior to Certificate of Occupancy, as specified in the applicable Ordinance or Resolution for the specific fee) of impact fees, connection fees and other similar fees based upon additional facilities needed to accommodate new development at established City service level standards, including, but not limited to, sewer capacity charges, Park Fees and Transportation Impact Fees.
19. The applicant shall file a separate plan check submittal to the Long Beach Fire Department for their review and approval prior to the issuance of a building permit.
20. All required utility easements shall be provided to the satisfaction of the concerned department or agency.
21. Demolition, site preparation, and construction activities are limited to the following (except for the pouring of concrete which may occur as needed):
 - a. **Weekdays and federal holidays: 7:00 a.m. to 7:00 p.m.;**
 - b. **Saturday: 9:00 a.m. - 6:00 p.m.; and**
 - c. **Sundays: not allowed**
22. All **unused curb cuts** must be replaced with full height curb, gutter, and sidewalk, and any proposed curb cuts shall be reviewed, approved and constructed to the specifications of the Director of Public Works.
23. Compliance is required with these Conditions of Approval as long as this use is on site. As such, the site shall be available for periodic reinspection conducted at the discretion of city officials, to verify that all conditions of approval are being met. The property owner shall reimburse the City for the inspection cost as per the special building inspection specifications established by City Council.
24. The developer shall contribute at least one-half of one percent of the value of the development for pedestrian access to the beach. Please contact the Parks, Recreation and Marine Bureau a (562) 570-3130 for details.
25. Any portion of the building south of the ^{shoulder} toe of the bluff shall be terraced to reflect the sloping nature of the bluff. Each floor shall be setback from the floor below to create a terraced appearance to the satisfaction of the Zoning Administrator. A revised plan shall be submitted for review and approval.

26. Balconies shall be located at the corners of the building to create a more terraced appearance.
27. The applicant shall provide underground wiring for utility service to the project from the applicable pole and shall provide a vacant duct to the appropriate feed point for connection to future underground service to the satisfaction of the Director of Planning and Building.
28. The applicant shall comply with the following conditions to the satisfaction of the Director of Public Works:
- A. The developer is required to provide sidewalks adjacent to the property along Bluff Place that meet ADA standards. Dedications of additional sidewalk area may be required as necessary to meet ADA standards;
 - B. The developer shall improve the full width of Bluff Place adjacent to the site;
 - C. The developer shall relocate existing facilities as necessary to accommodate the construction of a new sidewalk;
 - D. The developer shall submit the necessary engineering street improvement plans for review and approval;
 - E. The Director of Public works shall approve the location of any proposed driveway;
 - F. A grading plan shall be submitted to the Public Works Department for review and approval. Water shall not drain onto Bluff Place. Please contact Tony Arevalo at (562) 570-6289 for details;
 - G. The applicant shall obtain approval from the Public Works Department for any required off-site improvements and replace any off-site improvements found to be damaged.
29. One cluster of three palm trees for each twenty feet of beach frontage shall be provided and any exposed bluff area shall be landscaped to the satisfaction of the Park, Recreation and Marine Bureau, including bluff areas on public property and adjacent public street rights-of-way.
30. The building height shall be limited to 36'5" (thirty-six feet and five inches with an elevation of 54' above sea level as shown on the submitted plans) in three (3) stories with a partial basement and roof deck. The maximum railing height for the roof deck shall be 3'6" for a total building height of 39'11". This height shall be measured from grade (average elevation at front top of curb line; however, if the average elevation of the rear property line differs from that of the front top of curb by five feet or more, then grade shall be the plane connecting the average front and average rear elevation). In this case, height is measured from the average front and rear elevation.
31. A topographic map shall be provided with contour lines at 1' intervals. The building shall not extend toward the beach further than the toe of the bluff.

32. A sectional roll-up door with an automatic garage door opener shall be provided. Also, exterior lighting shall be provided for the garage and front entry.
33. The structure shall be used as a single-family dwelling. The applicant shall record a deed restriction/covenant limiting the use of the home and basement as a single-family residence. The deed restriction shall also include a requirement that limits the height of the building to three stories with a partial basement and roof deck and height of 36'5"/54' elevation as measured and shown on the submitted plans dated October 29, 2003 for Case No. 0309-12. No structures shall be added to the roof of the building including shade structures, patio covers, and/or an increase in the height of the balcony railing.
34. The driveway slope shall comply with current code requirements of one (1) foot of vertical rise for each seven (7) feet of horizontal length. The applicant shall provide a section plan showing the slope of the driveway prior to issuance of a building permit.
35. The building height in the 8'0" required street side yard setback off 12th Place is approved as shown on the submitted plans dated December 1, 2003.
36. The balcony railings shall be constructed of clear glass or other transparent material to the satisfaction of the Zoning Administrator.
37. The applicant shall defend, indemnify, and hold harmless the City of Long Beach, its agents, officers, and employees from any claim, action, or proceeding against the City of Long Beach or its agents, officers, or employees brought to attack, set aside, void, or annul an approval of the City of Long Beach, its advisory agencies, commissions, or legislative body concerning this project. The City of Long Beach will promptly notify the applicant of any such claim, action, or proceeding against the City of Long Beach and will cooperate fully in the defense. If the City of Long Beach fails to promptly notify the applicant of any such claim, action or proceeding or fails to cooperate fully in the defense, the applicant shall not, thereafter, be responsible to defend, indemnify, or hold harmless the City of Long Beach.

COASTAL COMMISSION

EXHIBIT # 5
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APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT

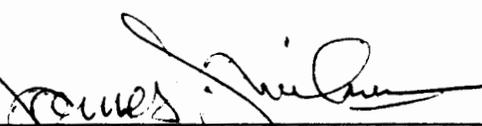
State briefly your reasons for this appeal. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)

AS AN OWNER OF PROPERTY ON 12TH PLACE, AND
RESIDENT OF LONG BEACH, CA. WE APPEAL THE
DECISION OF THE LONG BEACH PLANNING COMMISSION
(CASE NO. 0309-12) OF JANUARY 15, 2004; BECAUSE
OF THE DENIAL OF - A - PRIMARY PUBLIC VIEW.
OF THE SHORELINE, THE BEACH, AND TO RELATED RECREATION
ASSETS, AS EVIDENCED BY SEVERELY REDUCED
PRIMARY VISUAL RESOURCES ATTRIBUTED (SEE ADDITION)

Note: The above description need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or
Authorized Agent

Date

2/2/04

NOTE: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby authorize JAMES J. MILNER to act as my/our representative and to bind me/us in all matters concerning this appeal.



Signature of Appellant(s)

Date

Feb 2, 2004 **COASTAL COMMISSION**

A5-LOB-04-059

EXHIBIT # 6
PAGE 1 OF 17

ADDITION
REASONS FOR THE APPEAL (CONT.)

TO CONSTRUCTION AND LANDFORM ALTERATIONS BY THE PLANNED CONSTRUCTION OF A SINGLE FAMILY RESIDENCE AT 1724 BLUFF PLACE, LONG BEACH, CA. ACCORDING TO ITS PLANNING AND BUILDING DEPARTMENT, THE CITY OF LONG BEACH HAS NO ORDINANCE(S) RESTRICTING PRIMARY VISUAL ACCESS TO COASTAL AREAS BY STRUCTURES LOCATED IN AREAS ADJACENT TO OR NEAR SUCH COASTAL ASSETS

IN THE VIEW OF THE APPELLANT, AND OTHERS AFFECTED BY THIS NEGATIVE SITUATION, THIS IS AN ISSUE THAT CRIES FOR REVIEW AND/OR LEGISLATIVE RELIEF.

ADDITIONALLY, THE APPELLANT CAN FIND NO EVIDENCE OF DEPTH OR OTHER EXCAVATION OR DRILLING STUDIES TO DETERMINE SUBTERRANEAN STABILITY OF THE SITES LOCATED ON BLUFF PLACE IN LONG BEACH; NOR IS THERE EVIDENCE OF TIDAL OR WAVE SURGE STUDIES RELATIVE TO BLUFF PLACE.

THE LCD PAGES (ATTACHED) AND PARAGRAPHS CITED BELOW INDICATE SPECIFIC PROVISIONS THAT REFER TO SHORELINE PUBLIC ACCESS:

- ATTACHMENT 1 PAGE II-19 GENERAL STRAND POLICIES, USE AND ACCESS
- ATTACHMENT 2 PAGE III-A-6 VISUAL RESOURCES AND SPECIAL COMMUNITIES
- ATTACHMENT 3 PAGE III-A-10 (PARAGRAPH 2) "OCEAN BOULEVARD AS A LOCAL SCENIC ROUTE"

COASTAL COMMISSION

ADDITION
REASONS FOR APPEAL (CONTINUED)

ATTACHMENT

4. PAGE III-A-12 HAZARD AREAS AND
VISUAL RESOURCES

ATTACHMENT

5. PAGE III-A-16 OCEAN BOULEVARD
PLANNED DEVELOPMENT PLAN
(PD-1)

IN CONCLUSION, IT IS INTERESTING TO NOTE THAT, NOT WITHSTANDING THE SPECIFIC REFERENCES TO PUBLIC VIEW OF THE SHORE LINE, THERE IS NO CONCOMITANT CITY ORDINANCE TO PROTECT SUCH SHORELINE ASSETS; A SITUATION MENTIONED ABOVE. VARIANCES ALLOW FOR SUCH OVERSIGHT. IN CLOSING, THE COMMISSION SHOULD BE AWARE THAT AT ONE TIME DURING THE HEARING PROCESS BEFORE THE LONG BEACH ZONING COMMISSIONER, THE OWNER-BUILDER AND THE APPELLANTS AGREED TO A COMPROMISE TO LOWER THE INSIDE CEILING HEIGHTS TO EIGHT (8) FEET, THEREBY LOWERING THE BUILDING HEIGHT TO AN ACCEPTABLE DEGREE, THIS WOULD HAVE RESOLVED THE OBJECTIONS OF ALL APPELLANTS BUT WAS LATER REJECTED BY THE OWNER BUILDER.

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ATTACHMENT 1

LCP

GENERAL STRAND POLICIES
USE AND ACCESS

This section contains all of the policies related to development and use of and access to the Strand portion of the coastal zone. Each of these policies is reproduced in the appropriate sections of the Community Plans. The purpose of presenting them here is to define the overall coordinated policy for this important coastal resource.

The Long Beach Strand is defined as the beach portion of the Tidelands area between Alamitos Avenue and the Alamitos Bay Jetty. It is physically divided into a west beach and east beach by the Belmont Pier, which currently prevents passage of beach patrol and maintenance vehicles except at low tide. The following recommendations are divided into six categories as follows (these can also be found in the Policy Plans):

1. General recommendations affecting the entire strand.
2. Segment 1 recommendations for area between Alamitos and Cherry.
3. Segment 2 recommendations for area from Junipero to Belmont Pier.
4. Segment 3 recommendations for area from Belmont Pier to 55th Place.
5. Segment 4 recommendations for area from 55th Place to Alamitos Bay Jetty.
6. Bluff Treatment.

GENERAL RECOMMENDATIONS

1. Only beach dependent recreational facilities, such as sand volleyball courts, should be located on the beach, i.e., no handball, basketball, or tennis courts except as provided for herein. No windbreaks should be constructed which would block or inhibit seaward views. No commercial establishments and no additional parking should be permitted on the beaches except as otherwise provided for in this LCP. ✓
2. Combination restroom/concession facilities should be located near the landward side of the beach while restroom facilities alone should be located at variable distances on the landward side of the beach so as to best provide convenience to both beach users and users of such grassy areas and/or bike paths and walkways as may be developed.

COASTAL COMMISSION

EXHIBIT # 6
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LCP

HAZARD AREAS

The Seismic Safety Element of the City's General Plan designates two distinct seismic response zones in Area A. One is the beach area, and the other the remainder of Area A above the bluffs. The bluffs themselves are not treated separately by this study.

The following conclusions are drawn for the beach area. The soil type is natural or hydraulic fill, generally granular. It is located near an area having slopes greater than 20%. The ground-water level is less than 20'. Fault rupture potential during a seismic event is considered minimal, as is flooding. The area is subject to tsunamis (seismic sea waves). There exists a very great potential for liquefaction. Ground shaking is considered most severe for high rise structures, but since there are not now and never will be high rise (or any other) structures on the beach, this point is academic.

The description of the urbanized (upland) portion of Area A is as follows: The soil type is predominantly granular non-marine terrace deposits. The land is flat with a groundwater level of from 40 to 80 feet. The fault rupture potential is considered minimal, as is the potential for flooding. The liquefaction potential is remote, as is the probability of tsunami damage. Ground shaking is considered most severe for low rise structures, one to nine stories. However, all modern construction from one story wood frame to moment resisting steel frame buildings higher than 160' are considered compatible with the seismic responses to be expected in Area A.

VISUAL RESOURCES AND SPECIAL COMMUNITIES

Ocean views from Ocean Boulevard are very limited because of the dominance of structures and lack of open spaces between them, the narrow streets, and the height of the bluff. The viewer on the Boulevard catches only glimpses of blue sky and slightly bluer water. Only by walking or driving to the end of one of the narrow north/south streets can the entire view be enjoyed. Some of the structures have been designed to maximize the view potential from the living units. Others appear to have ignored this amenity altogether.

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AREA A
POLICY PLAN SUMMARY

SHORELINE ACCESS

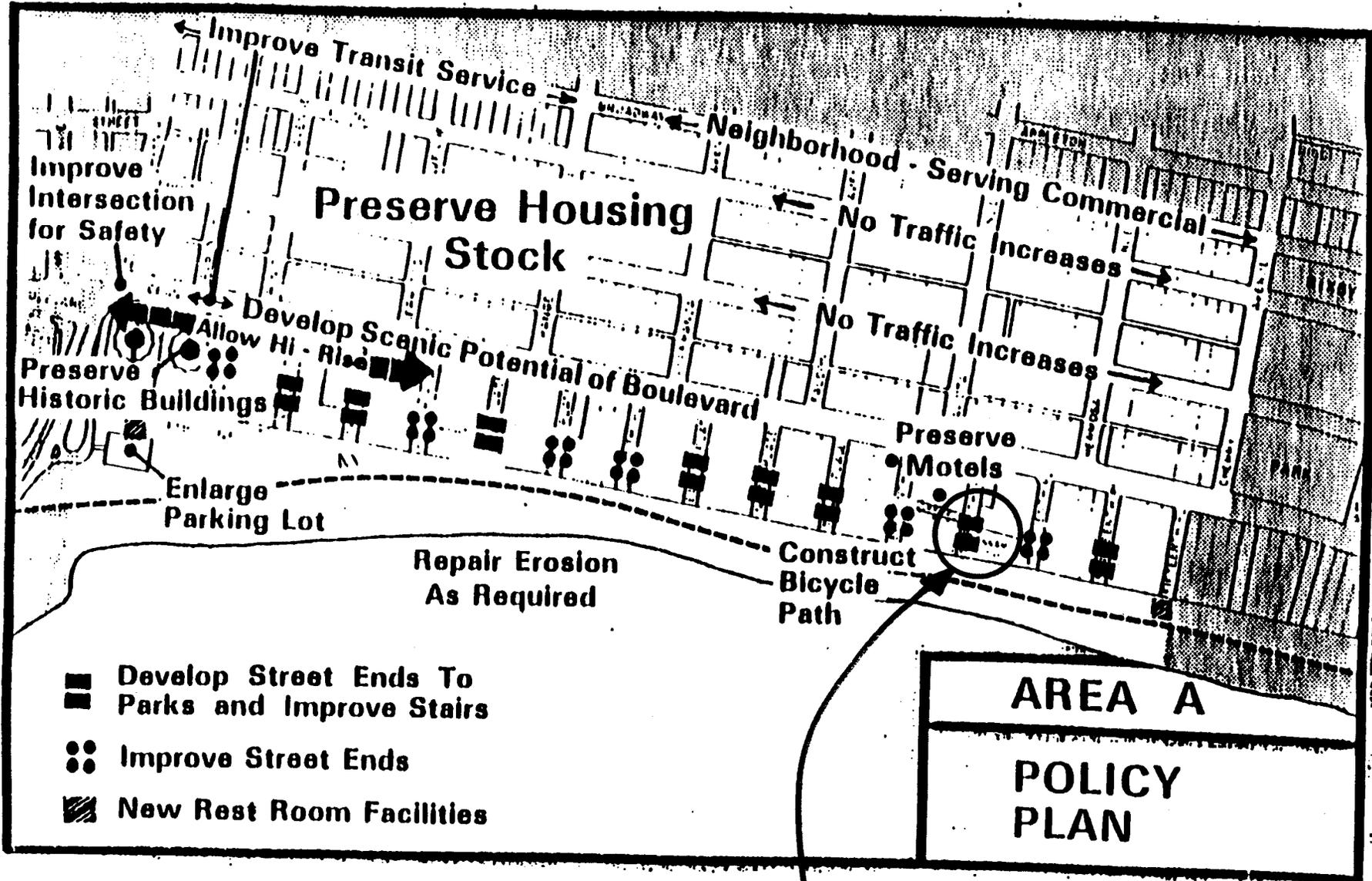
A principal objective of this plan is to improve public access to the beach in Area A. This will be accomplished in part by improvements to the street ends south of Ocean Boulevard. These will be developed as mini-parks for viewing and/or beach access purposes. Stairways at existing locations will be improved or rebuilt as required for public safety and increased capacity. The funding for these improvements will be derived in part from the one-half of one percent in lieu fee payment required of developers under certain conditions.

Another method of improving public access is through a continuing emphasis on the importance of the transit system in the coastal zone (and all of Long Beach). These services shall be reviewed periodically by the transit authorities for the purpose of increasing ridership and supplementing routes with mini-buses, vans, shuttles, and other cost-effective and efficient equipment. It is expected that future events of world-wide importance and certainly far beyond the influence of this LCP (especially, more severe gas shortages and ever-increasing prices) will eventually do more to force increased transit ridership than anything the City or Transit Company can do in the short term. When this happens, the severe parking shortage in Area A, long blamed as the cause of sparse beach usage, will no longer be so important.

Bicycle use will be encouraged upon completion of the beach bike trail. This will make it possible for shore residents to bike safely to work downtown, an

COASTAL COMMISSION

EXHIBIT # 6
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Page III-A-9

12th Place

COASTAL COMMISSION

EXHIBIT # 6
 PAGE 7 OF 17

ATTACHMENT 3

Page III-A-10

LCP

option which will no doubt become more attractive in the future.

This plan emphasizes the development of Ocean Boulevard as a local scenic route rather than as a commuter corridor (see chapter on Conformance with General Plan Elements). ✓

No measures to encourage increased utilization of First and Second Streets and Broadway shall be implemented, although some natural increases will occur as the result of the slightly higher densities allowed by this plan.

RECREATION AND VISITOR SERVING FACILITIES

The existing visitor serving facilities, especially the three motels, shall be preserved as they provide for coastal access and enjoyment by persons of low and moderate income.

The park-like street end development (described above) will serve both recreation and visitor serving needs by providing access to the beach, as well as quiet sitting and viewing areas.

The beach bicycle path is the principal new recreation development in Area A. It is the link between the San Gabriel River trail and the Los Angeles-Rio Hondo (LARIO) trail systems which serve much of Los Angeles and part of Orange Counties.

A connection between the beach bike path and Ocean Boulevard at Alamitos Avenue and 11th and 13th Places (via ramps) will be investigated as a part of the final design. A pedestrian path shall be constructed adjacent to the bike path.

The beach itself is the primary recreation and visitor serving resource in Area A. No proposals for changes to the beach are made by this LCP. New restroom and appurtenant beach serving facilities, however, are programmed at First Place, Eighth Place, and Cherry Avenue (see Strand Policies).

Parking for the beach in Area A will be supplemented by the addition of 50 spaces to the public lot in front of the Villa Riviera. Additionally, it is anticipated that some visitors to Marina Green Park who use those lots will circulate between the park and the beach.

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LOCATING AND PLANNING NEW DEVELOPMENT

Residential

Public policy and land use decisions shall be used to preserve existing viable neighborhoods in Area A. This is also a principal goal of the Land Use Element of the Long Beach General Plan. Residential policies are grouped for north and south of Ocean Boulevard,

North of Ocean Boulevard. The land use policy for this neighborhood is directed toward preserving the enormous stock of low and moderate cost housing. For design guidelines, see Appendix. For exact housing policies, see chapter on Housing Policy.

Generally, heights shall be limited to 35', with 55' permitted in some areas (see zoning map). Setbacks shall be increased over those required by the former zoning ordinance to improve open space. All parking shall be contained on-site to reduce the present over-parked curb situation and to free spaces for beach visitors. Mixed residential and commercial uses are encouraged along Broadway, with commercial nodes at certain intersections.

South Side of Ocean Boulevard. Measures shall be taken to preserve those buildings designated as historically or architecturally distinctive by the City's Cultural Heritage Committee (the Villa Riviera and the Pacific Coast Club), and others which may be so designated.

From First Place to Tenth Place high rise residential towers shall be permitted. See Implementation section for design and development details and for replacement policies. They must have on-site parking adequate for residents and visitors.

The three existing motels are to be preserved as stated in Recreation and Visitor Serving Facilities.

This plan allows an increase of 1,707 units over the entire Area A (see the chapter entitled Growth Increments).

Non-Residential

Commercial facilities are permitted along Broadway and tourist-related commercial on Alamitos Avenue. Along Broadway commercial shall be limited to retail uses which are neighborhood-serving in nature. Small shops catering to walk-in trade are preferred rather

COASTAL COMMISSION

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LCP

than auto-oriented shopping complexes. See plan for locations of commercial nodes.

Tourist uses along Alamitos are restaurants, shops, motels, and similar uses. See Implementation for regulations.

DIKING, DREDGING, FILLING AND SHORELINE STRUCTURES

Accretion and erosion of beach sand is occasionally a problem in Area A, and may become more of a problem upon completion of the Downtown Marina. This plan recommends the continuation of the established program for management of these problems.

HAZARD AREAS

Construction of units on the face of the bluff will require that studies be made by each developer of soil stability conditions. Otherwise, there are no special requirements not included in the Uniform Building Code. ✓

VISUAL RESOURCES AND SPECIAL COMMUNITIES

Measures for implementation of this policy plan adequately protect and enhance the visual resources of Area A, particularly those dealing with setbacks, view protection, shadow control, and development of street ends. See Implementation section. ✓

PUBLIC WORKS

This plan recommends the following public works in Area A:

1. Bike path and parallel pedestrian path.
2. Park-like development at street ends.
3. Stairway improvements to facilitate beach access.
4. Restrooms on the beach.
5. Expanded parking lot at First Place.

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LCP

OCEAN BOULEVARD
PLANNED DEVELOPMENT PLAN
(PD-1)

The intent of this Planned Development Plan is to provide a framework to guide new development in a way that is sensitive to the high level of public interest in the plan area. The plan area is land between the public beach and the first parallel public roadway, Ocean Boulevard, from Alamitos Boulevard to Bixby Park which is designated as a scenic route. The land is in private ownership and is primarily used as multi-family residences at a high density. Many of these uses are likely to be replaced by new uses. This plan is intended to cause new development to be of a similar nature, designed with sensitivity to the policies of the California Coastal Act of 1976 and the Long Beach Local Coastal Plan, and incorporating a maximum of public involvement and review of the individual projects.

A special incentive provision is provided in this Planned Development Plan to encourage lot assembly for the construction of high rise development. In this incentive, higher density and greater height are provided in exchange for greater visibility of the ocean, greater on-site open space and greater contributions to access to the beach by improvements in public rights-of-way.

In reviewing and approving site plans and tract maps for the development of the area, the City Planning Commission shall be guided by the goals and policies of the General Plan and the General Development and Use Standards specified herein. The Commission shall not permit variance from those standards unless it finds that such variance meets the intent of the original standards and is consistent with the overall goals and objectives of the adopted Specific Plan. When a variance is requested within the Coastal Zone, a finding shall also be required that "This variance will not adversely affect access to or along the shoreline including physical, visual or psychological qualities of access." ✓

GENERAL DEVELOPMENT AND USE STANDARDS

1. Use. All uses in this plan area shall be multi-family residential.
2. Existing motel sites shall be retained in motel use. The Pacific Coast Club site, if the

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(b) **Access.**

1. **Vehicular.** Vehicular access shall be limited to the north/south side streets, the "Places", whenever a development site has access to the side streets. When such access is not available, access shall be from Ocean Boulevard.

2. **Pedestrian.** Pedestrian access from Ocean Boulevard to the beach shall be provided along the "Places". Each new development shall provide for improving such access at one place through the provision for such features as new stairways, lighting, landscaping and street improvements, according to an improvement plan consistent with LCP access plan map to be developed by the Tidelands Agency and the Bureau of Parks, and approved by the Planning Commission. Such plan shall be developed and approved prior to the granting of any development approval. Development responsibility for such provisions shall be at least one-half of one percent of the value of the development.

(c) **Building Design Standards.**

1. **Design character.** All buildings shall be designed so as to provide an interesting facade to all sides and to provide an open and inviting orientation to Ocean Boulevard. The following additional features shall also be provided:

A. The exterior building design style and facade shall be appropriate for the area and harmonious with surrounding buildings.

B. Any portion of any building south of the shoulder of the bluff shall be terraced to reflect the sloping nature of the bluff.

2. **Yard areas.**

A. **Setbacks.**

(1) Ocean Boulevard frontage - twenty feet from property line.

(2) Side streets - eight feet from side street property line.

(3) Interior property lines - ten percent of the lot width.

(4) Beach property lines - no building shall extend toward the beach further than the toe of the bluff, or where existing development has removed the toe of the bluff, no building shall extend toward the beach further than existing development on the site.

B. Projections into setbacks. Porte-cochere and balconies may project into yard areas provided:

- (1) They do not project into interior yard areas.
- (2) They do not project more than one-half of the required setback.

(d) **Parking.**

1. Number of spaces.

A. Residential. 2.00 spaces shall be required for each dwelling unit for resident use, except elderly housing provided as affordable housing (so stipulated by Deed restriction) which shall require not less than 1.25 spaces per unit. One-quarter space per dwelling unit shall be required for guest use.

B. Hotel/Motel. One space per room (including banquet, meeting rooms, restaurants, etc.) Or 0.75 per room (including banquet, meeting rooms, restaurants, etc., counted separately).

C. Other uses. As per Zoning Regulations outside of planned development areas.

2. Size of spaces. Parking space sizes shall be as required for the applicable use under Table 41-2 of Chapter 21.41 of the Long Beach Zoning Regulations.

3. Tandem spaces. Tandem spaces may be used in hotel/motel use with valet parking arrangements and in residential use when both spaces are assigned or sold to the same dwelling unit. Guest parking may be provided in tandem with valet parking arrangements.

4. All parking shall be in garages closed to public view of vehicles inside. No parking garage other than grade access facilities shall be permitted at grade on the Ocean Boulevard frontage.

(e) **Landscaping.**

One palm tree not less than fifteen foot high as street tree for each twenty feet of street frontage; one twenty-four inch box and one fifteen gallon tree for each twenty feet of street frontage. Five five-gallon shrubs per tree. One cluster of three palm trees for each twenty feet of beach frontage. Any exposed bluff area shall be landscaped to the satisfaction of the Park Bureau of the Department of Public

Works, including bluff areas on public property and adjacent public street rights-of-way.

(f) ***Off-site improvements required of developer.***

1. Public access. Public access shall be provided for as described under pedestrian access.
2. Landscaping. Each new building constructed shall provide street trees, bluff and beach landscaping.

SPECIFIC DEVELOPMENT AND USE STANDARDS

Subarea 1. This subarea is the area closest to downtown. It is distinguished by three existing high rise buildings, The Villa Riviera, The Pacific Coast Club, and the St. Regis (the former two being designated as cultural landmarks) and a single-family home designed by the prominent architectural team of Charles and Henry Greene.

- (a) **Uses.** Residential. Standard site development - up to fifty-four dwelling units per net acre; incentive development - up to one hundred twenty dwelling units per net acre.
- (b) **Access.** As noted in general standards
- (c) **Building Design.**
 1. Floor area ratio.
 - A. Standard site development. No building shall exceed in gross floor area more than two and one half times the area of its site.
 - B. Incentive development. No building shall exceed in gross floor area more than six times the area of its site.

Parking area shall not be included as floor area.
 2. Height.
 - A. Standard site development. Forty-five feet or four stories above Ocean Boulevard elevation.
 - B. Incentive development. No building shall exceed the height of the

bottom of the roof of the Villa Riviera, or sixteen stories, whichever is more restrictive.

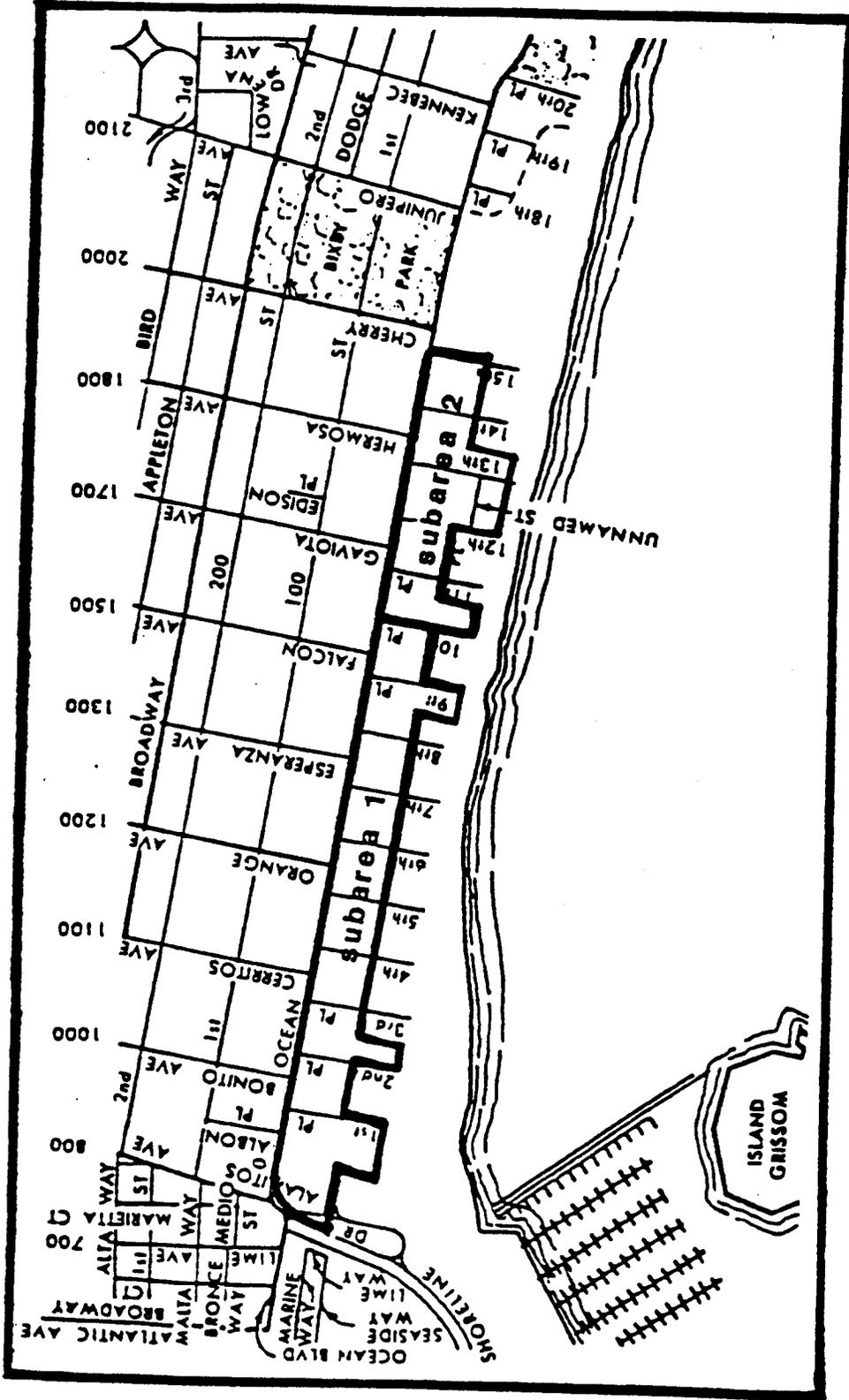
3. Lot coverage.
 - A. Standard site development. From Ocean Boulevard grade to the sky, lot coverage shall not exceed sixty-five percent of the lot area.
 - B. Incentive development. From Ocean Boulevard grade to the sky, lot coverage shall not exceed thirty percent of the lot area. Planters, not more than three feet above Ocean Boulevard grade shall not be considered as lot coverage.
4. Special design features for incentive development.
 - A. The development site must be not less than forty thousand square feet in net site area.
 - B. Provisions shall be incorporated into the proposal for public views through the site to the ocean to the maximum extent practical by such means as, but not limited to:
 - (1) Open Ocean Boulevard story for view under the development;
or
 - (2) Wide, unfenced side yards; or
 - (3) Unfenced diagonal setbacks at corner with side street (Places);
or
 - (4) In addition to item (1), (2), and (3), each incentive development shall provide view corridors through the development as additional side yard width so that the total area provided in both side yards shall not be less than thirty percent of the width of the site. Instead of a typical side yard, this view corridor may be provided through a triangular area of not less than fifteen percent of the lot area, provided the base of the triangle is at the front setback line, the point of the triangle is at the rear setback line and one side of the triangle is contiguous to a side yard setback line. The view corridor and side yard setback areas shall contain no structure or plant material which blocks public views to the sea from Ocean Boulevard. However, upon a demonstration that maximum public ocean views for auto and pedestrian traffic are protected, the following uses may be

permitted: raised planters, elevated not more than three feet above Ocean Boulevard; landscaping consisting of low-growing plants and shrubs, and high-branching trees; and security fencing along the bluff top where visually open materials are used, e.g., wrought iron or chain link.

- C. The building shall be designed to minimize shadows being cast north of Ocean Boulevard. Shadows shall not be cast north of Ocean Boulevard between the hours of 11:30 A.M. to 1:30 P.M. except during three months of the year.
- D. Development on a single site shall contain no more than one high rise structure.

Subarea 2. This area is a transition area between the large scale high intensity development of the downtown and smaller, less intense development of the eastern portion of the coastal zone.

- (a) **Uses.** Residential; up to a density of fifty-four dwelling units per acre. Existing motel use sites shall remain in motel use.
- (b) **Access.** Same as general development and use standards.
- (c) **Building design.**
 - 1. **Floor area ratio.** The gross floor area of the building shall not exceed two and one-half times the area of the site. Parking area shall not be included as floor area.
 - 2. **Height.** The height of the building shall not exceed forty-five feet or four stories above Ocean Boulevard grade.
 - 3. **Lot coverage.** Lot coverage shall not exceed sixty-five percent from Ocean Boulevard grade to the sky.
 - 4. **Usable open space.** Each unit shall have a minimum of sixty-four square feet of usable open space abutting the unit, only accessible from the dwelling unit.



Ocean Boulevard Planned Development

COASTAL COMMISSION

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James I. Linden, Ph.D.

Clinical Psychology

February 23, 2004

To: California Coastal Commission
200 Oceangate, Suite 1000
Long Beach, CA 90802
Attn: Mr. Charles Posner

Re: Appeal No. **A5-LOB-04-059**
1724 Bluff Place
Long Beach, CA 90802

Dear Mr. Posner:

This is a response to the Appeal regarding our proposed home at 1724 Bluff Place in Long Beach. The Appeal concerns the effects that our home would have on the public view from the end of 12th Place toward the Queen Mary and downtown Long Beach.

In October 2003, we prepared plans to build a four-story house on this site. In response to concerns raised by neighbors about its effect on the view, we completely redesigned the house. Even though our original plans were below the zoned height limit for this lot, we eliminated the top floor entirely and reduced the height of the ceilings from ten feet on all floors, to eight feet on the first floor and nine feet on the second and third floors.

In order to enable us to make up for the lost square footage on the top floor, the Long Beach Zoning Administrator and the Planning Commission approved variances in the setbacks, resulting in a much shorter but wider house.

In our attempt to work with our neighbors in the past few months, we erected story poles at the property site, we had numerous meetings with the two couples objecting to our plans, and we have tried every possible way to lower the overall height of our house in order to minimize the impact of the public views from the end of 12th Place.

A significant piece of the history of this dispute needs to be addressed: The original complaints of the two neighbors who were voicing opposition were clearly motivated by the fact that their own private views (from one couple's home and the other couple's apartment house) would be affected by our proposed home. It is certainly true that the top of our home would partially affect the views of the Queen Mary from their residences. When it was pointed out that there is no private view ordinance in Long Beach, the focus of their complaints shifted to the issues of restricting the public view of downtown Long Beach.

I am very much a supporter of the values and goals of the California Coastal Commission (and always have been). However, although the top of our house would partially affect the view from the end of 12th Place toward the Queen Mary, it should be noted that **THE VAST MAJORITY OF THE PUBLIC VIEW FROM THE END OF 12TH PLACE IS COMPLETELY UNAFFECTED BY OUR PLANS.** (Please see the enclosed pictures to see this better.)

6226 East Spring Street • Suite 260 • Long Beach • California
(562) 425-0351 • (562) 431-4741 • Fax (562) 429-4556

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In other words, if the public view is what the appeal is about, it seems to us to have very little merit. One can see the ocean with no obstructions whatsoever from the end of 12th Place, with or without our planned home. There is an unobstructed view looking directly south toward the ocean, and down the coast toward the east as far as Newport Beach.

Further:

1. There is an existing home two lots away from our property at virtually the same height as our proposed home (1710 Bluff Place);
2. Another two unit condo was approved without appeal three lots to the west that is fully one story (8-10 feet) higher than our home (1700 Bluff Place); and
3. There is another proposed project next door to our lot, which would be 4-5 feet higher than our project (1720 Bluff Place).

Aside from the fact that there would be very minimal view impact from our proposed home, it would seem that there is precedent to allow three other projects to be constructed on this street that are up to 5-10 feet higher than ours.

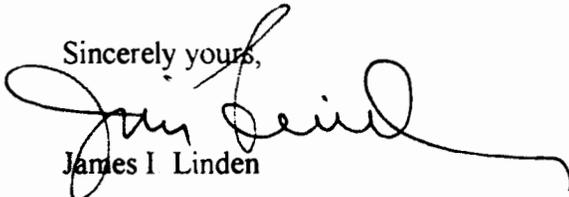
Additionally, the owner of the property on the west side of 12th Place on the bluff (Dr. Karcz) has initiated plans to expand the apartments on his property, which will render this entire issue academic within a year or so, when his building is completed. His new apartments will completely block any view of our house down below the bluff (let alone the Queen Mary and downtown).

As stated above, we have worked in good faith with our neighbors for many months. We are genuinely sympathetic with the concerns of not restricting public visual access to the beach. However, the only way to lower the home any further would be to reduce the ceilings in the living rooms to eight feet. These days, for luxury homes this lower height is below customary standards. The standard for new homes of this type have ceilings of at least nine feet, and most are ten feet or much higher (e.g., the property being built at 1700 Bluff Place approved two months ago, and the property recently approved by the Long Beach Planning Commission last week at 1720 Bluff Place).

In conclusion, I hope you will consider the steps we have already taken to respond to the concerns of our neighbors and will agree the project as it stands has a very minimal effect on the public's visual access to the coastline. From the end of 12th Place, most of the ocean view will remain totally intact if our project is approved.

Thank you for your consideration in this matter.

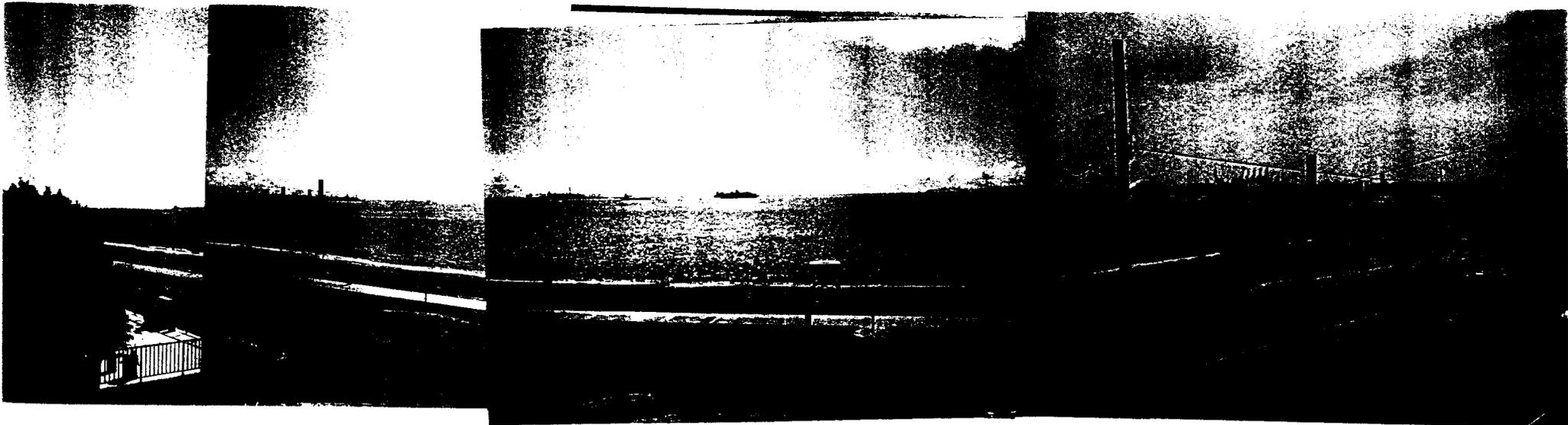
Sincerely yours,



James I. Linden

COASTAL COMMISSION

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VIEW FROM THE HIGHEST POINT
OF 12TH PLACE

PLEASE NOTE:

1. THE PHOTOGRAPHS WERE TAKEN PER NEIGHBORS REQ TO STUDY THE IMPACT ON THE PRIVATE AND PUBLIC VIE
2. THE HEIGHT OF PROPOSED RESIDENCE IS ALLIGNED WIT THE TOP OF ROOF OF THE EXISTING HOUSE.

Sea

Queen Mary

MHTL

BEACH

Public View w/ variances

View w/o variances

Existing Public View

8' setback

Top of bluff ??

8' setback

Site

1724

Bluff Place

Bluff edge-top

12th Place

South

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COASTAL COMMISSION

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Public Vista from 12th Place

Applicant's
Story Pole #2

Proposed roofline

Applicant's
Story Pole #1

1710-1718 Bluff Pl

A5-LOB-04-059

COASTAL COMMISSION

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