

CALIFORNIA COASTAL COMMISSION

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F11b

Appeal Filed: 09/15/15
49th Day: 11/03/15
Staff: M. Alvarado-LB
Staff Report: 09/24/15
Hearing Date: 10/09/15

STAFF REPORT: APPEAL – SUBSTANTIAL ISSUE

Appeal Number: A-5-VEN-15-0059

Applicant: Kambiz Kamdar

Local Government: City of Los Angeles

Local Decision: Approval with Conditions

Appellants: Robin Rudisill, Todd Darling, Gabriel Ruspini, Pam Anderson, Lydia Ponce, Sue Kaplan, George Gineris, Ivonne Guzman, and Laddie Williams

Project Location: 672 Brooks Avenue, Venice, City of Los Angeles (Los Angeles County)

Project Description: Appeal of City of Los Angeles Local Coastal Development Permit (CDP No. ZA 2014-1088) for the demolition of a one-story single-family residence, a small-lot subdivision of an approximately 5200 square foot lot into two lots, and the construction of a single-family residence on each lot.

Staff Recommendation: Determine that a substantial issue exists.

SUMMARY OF STAFF RECOMMENDATION

The staff recommends that the Commission, after public hearing, determine that a **substantial issue exists** with respect to the project's conformity to the community character policies of sections 30251 and 30253 of the Coastal Act. Pursuant to section 30625, the grounds of appeal are limited to whether or not a substantial issue exists as to conformity with Chapter 3 of the Coastal Act when there is an appeal pursuant to section 30602(a).

IMPORTANT NOTE: The Commission will not take testimony on this “substantial issue” recommendation unless at least three commissioners request it. The Commission may ask questions of the applicant, any aggrieved person, the Attorney General or the executive director prior to determining whether or not to take testimony regarding whether the appeal raises a substantial issue. If the Commission takes testimony regarding whether the appeal raises a substantial issue, testimony is generally and at the discretion of the Chair limited to 3 minutes total per side. Only the applicant, persons who opposed the application before the local government (or their representatives), and the local government shall be qualified to testify during this phase of the hearing. Others may submit

A-5-VEN-15-0059

Appeal –Substantial Issue

comments in writing. If the Commission finds that the appeal raises a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

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EXHIBITS

- Exhibit 1 – Project Location and Vicinity Map
- Exhibit 2 – Site Plan and Elevations
- Exhibit 3 – Appeal
- Exhibit 4 – Local Coastal Development Permit

I. MOTION AND RESOLUTION - SUBSTANTIAL ISSUE

Motion: *I move that the Commission determine that Appeal No. A-5-VEN-15-0059 raises NO Substantial Issue with respect to the grounds on which the appeal has been filed under § 30602 of the Coastal Act.*

Staff recommends a **NO** vote. Failure of the motion will result in a de novo hearing on the application and adoption of the following resolution and finding. Passage of this motion will result in a finding of No Substantial Issue and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the Commissioners present.

Resolution:

*The Commission hereby finds that Appeal No. A-5-VEN-15-0059 presents a **SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under § 30602 of the Coastal Act regarding consistency with Chapter 3 policies of the Coastal Act.*

II. APPELLANTS' CONTENTIONS

On August 17, 2015, the Commission received a valid notice of final local action for Local Coastal Development Permit (CDP) No. ZA 2014-1088, which approves the demolition of a one-story duplex, a small-lot subdivision, and the construction of an approximately 2,424 square foot single-family residence and a 2,420 square foot single-family residence, one on each of the newly subdivided lots (Unit 1: 2,424 square feet; Unit 2: 2,420 square feet), with four tandem parking spaces.

On September 15, 2015, within 20 working days of receipt of notice of final local decision, Robin Rudisill, Todd Darling, Gabriel Ruspini, et al., filed an appeal of the local CDP alleging that the proposed project violates the Chapter 3 policies of the Coastal Act and the standards of the Venice Land Use Plan (LUP). The appellants assert that the proposed project poses adverse impacts to the community character of Venice, compliance with CEQA, and affordable housing (“Mello Act”) (**Exhibit 3**). As such, the appellants contend that the City-approved development could prejudice the City’s ability to prepare a Local Coastal Program (LCP). No other appeals were received prior to the end of the appeal period on September 15, 2015.

III. LOCAL GOVERNMENT ACTIONS

In 2014, the applicant submitted to the City of Los Angeles Planning Department a Master Land Use Permit Application for the proposed project. The application was assigned Case No. 2014-1088.

The project description of the Local CDP No. ZA 2014-1088 reads as follows:

“...the demolition of a single-family dwelling and guest house, and construction of two dwelling units in conjunction with Preliminary Parcel Map AA-2014-1088-PMLA-SL within the single permit jurisdiction of the California Coastal Zone”.

On August 11, 2014, the City issued a Mitigated Negative Declaration (ENV-2014-1087-MND) for the proposed project. On June 10, 2015, the City held a public hearing for Local Coastal Development Permit No. ZA 2014-1088 according to the City's notice of final local decision (**Exhibit 4**). Information concerning who attended the hearing and whether or not public testimony was given at the hearing is not in the City's staff report.

On July 17, 2015, the Zoning Administrator approved with conditions the Local Coastal Development Permit for the proposed demolition of a single-family residence, a small-lot subdivision into two lots, and the construction of a two single-family residences, one on each lot. The Zoning Administrator's determination was concurrent with the approval of the Parcel Map for the Small-Lot Subdivision No. AA-2014-1086-PMLA-SL.

The Commission received a valid notice of final local action for Local Coastal Development Permit (CDP) No. ZA 2014-1088 on August 17, 2015. Although the ZA's action was appealable to the Planning Commission, no appeal was filed.

IV. APPEAL PROCEDURES

Section 30600(b) of the Coastal Act provides that prior to certification of its Local Coastal Program (LCP), a local jurisdiction may, with respect to development within its area of jurisdiction in the coastal zone and consistent with the provisions of Sections 30604, 30620 and 30620.5, establish procedures for the filing, processing, review, modification, approval or denial of a coastal development permit. Pursuant to this provision, the City of Los Angeles developed a permit program in 1978 to exercise its option to issue local coastal development permits. Sections 13301-13325 of Title 14 of the California Code of Regulations provide procedures for issuance and appeals of locally issued coastal development permits. Section 30602 of the Coastal Act allows *any* action by a local government on a coastal development permit application evaluated under Section 30600(b) to be appealed to the Commission. The standard of review for such an appeal is the Chapter 3 policies of the Coastal Act. [Cal. Pub. Res. Code §§ 30200 and 30604.]

After a final local action on a local coastal development permit application, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice which contains all the required information, a twenty working-day appeal period begins during which any person, including the applicants, the Executive Director, or any two members of the Commission, may appeal the local decision to the Coastal Commission. [Cal. Pub. Res. Code § 30602.] As provided under section 13318 of Title 14 of the California Code of Regulations, the appellant must conform to the procedures for filing an appeal as required under section 13111 of Title 14 of the California Code of Regulations, including the specific grounds for appeal and a summary of the significant question raised by the appeal.

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)(1) 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 no substantial issue. If the Commission decides that the appellant's contentions raise no substantial issue as to conformity with Chapter 3 of the Coastal Act,

the action of the local government becomes final. Alternatively, if the Commission finds that a substantial issue exists with respect to the conformity of the action of the local government with the Chapter 3 policies of the Coastal Act, the local coastal development permit is voided and the Commission typically continues the public hearing to a later date in order to review the coastal development permit as a de novo matter. [Cal. Pub. Res. Code §§ 30621 and 30625.] Section 13321 of the Coastal Commission regulations specifies that de novo actions will be heard according to the procedures outlined in Sections 13114 and 13057-13096 of the Commission’s regulations.

If there is no motion from the Commission to find no substantial issue, it will be presumed that the appeal raises a substantial issue and the Commission will schedule the de novo phase of the 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 Chapter 3 policies of the Coastal Act as the standard of review. The Venice Land Use Plan (LUP), certified on June 14, 2001, is used as guidance. 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, those who are qualified to testify at the hearing, as provided by Section 13117 of Title 14 of the California Code of Regulation, 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 applicants, 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.

V. DUAL PERMIT JURISDICTION AREA

Within the areas specified in Section 30601, which is known in the City of Los Angeles permit program as the *Dual Permit Jurisdiction* area, the Coastal Act requires that any development which receives a local coastal development permit also obtain a second (or “dual”) coastal development permit from the Coastal Commission. The Commission's standard of review for the proposed development in the *Dual Permit Jurisdiction* area is the Chapter 3 policies of the Coastal Act. For projects located inland of the areas identified in Section 30601 (i.e., projects in the *Single Permit Jurisdiction*), the City of Los Angeles local coastal development permit is the only coastal development permit required. The proposed project site is not located within the *Dual Permit Jurisdiction Area*.

VI. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

On August 17, 2015, the Commission received a valid notice of final local action for Local Coastal Development Permit (CDP) No. ZA 2014-1088, which approves the demolition of a one-story single-family residence, a small-lot subdivision, and the construction of two single-family residential units, one on each of the newly separate lots, with five tandem parking spaces.

The applicant proposes to demolish an existing one-story square-foot single-family residence and a guest house, and divide the approximately 5,201 square-foot lot under the Small-Lot Subdivision Ordinance into two separate lots (**Exhibit 2**). The applicant also proposes to construct two single-family residential units (Unit 1 and Unit 2), one on each lot. Unit 1 will be an approximately 2,424 square foot, 23-foot high two-story single-family residence on the lot fronting Brooks Avenue, and Unit 2 will be an approximately 2,420 square foot, three-story, 30-foot high single-family residence on the rear lot (**Exhibit 2**); unit 2 will have two stories of living space with the ground floor as the garage for both units. The proposed approximately 1,060 square-foot garage (under Unit 2) will provide five parking spaces (two standard and two compact tandem spaces, and one guest space) that will be accessible from the alley. Unit 1 will have a flat roof, a roof deck, and an approximately 100 square foot roof access structure. Unit 2 is proposed with a varied roofline and without a roof deck or roof access structure.

The project site is an approximately 5,201 square-foot through lot located at 672 Brooke Avenue venue in Venice, over ½ of a mile inland of the beach (**Exhibit 1**). The project is located in the R1.5-1 zoned, Low Medium II and Multi-Family designated developed residential neighborhood of the Oakwood subarea within the City’s Single Permit Jurisdiction Area. The site is located in the Brooks Avenue residential block, between 6th Avenue and 7th Avenue. The rear property line adjoins Brooks Court, the 10-foot wide alley behind the project site.

B. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS

Section 30625(b)(1) of the Coastal Act states that the Commission shall hear an appeal of a local government action carried out pursuant to Section 30600(b) unless it finds that no substantial issue exists as to conformity with Chapter 3 of the Coastal Act. The term “substantial issue” is not defined in the Coastal Act or its implementing regulations. Section 13115(b) of the Commission’s regulation simply indicates that the Commission will hear an appeal unless it “finds that the appeal raises no significant question.” In previous decisions on appeals, the Commission had 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 relevant provisions of 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 with respect to whether the local government action conforms to the provisions of Chapter 3 of the Coastal Act for the reasons set forth below.

C. SUBSTANTIAL ISSUE ANALYSIS

As stated in Section IV of this report, the grounds for an appeal of a Coastal Development Permit issued by the local government prior to certification of its Local Coastal Program (LCP) are that the locally issued CDP is not in conformity with the Chapter 3 policies of the Coastal Act. Any local government Coastal Development Permit issued prior to certification of its LCP may be appealed to the Commission. The Commission must then decide whether a substantial issue exists in order to hear the appeal.

The City Council, in approving Local Coastal Development Permit No. ZA 2014-1088, found that the proposed residential units would not prejudice the ability of the City to prepare an LCP for the Venice Coastal Zone and that the proposed project is consistent with the following Chapter 3 policies of the Coastal Act:

Section 30250(a) of the Coastal Act states:

New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

Section 30251 of the Coastal Act states, in part:

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

Section 30252(1-4) of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, [...]

Community Character

The appellants contend that the City-approved development is not consistent with the Chapter 3 policies of the Coastal Act and the standards of the Venice LUP because it does not conform to the

established community character, and it is out of scale with the surrounding residences within the Oakwood subarea of Venice.

The protection of community character is a significant issue for the residents of Venice. Venice has a unique blend of style and scale of residential buildings, historical character, walk streets, diverse population, as well as expansive recreation areas and attractions, such as the Ocean Front Walk (boardwalk) and the beach. These features make Venice a popular destination for Southern California residents and tourists. As a result of its unique coastal districts, Venice is a coastal resource to be protected. As a primarily residential community, the residential development is a significant factor in determining Venice's community character. The continued change in the residential character of the Venice Community has been a cause of public concern over the years.

During the March 2014 Commission hearing, public comments made regarding the issuance of De Minimis Waivers for demolition and construction of single family homes in the City of Los Angeles, particularly in Venice, lead to the Commission's decision to remove four De Minimis Waivers from the agenda and place them on the Regular Calendar agenda in near-future hearings. Comments from Venice residents during the March hearing expressed concerns over the lack of proper review and public input to preserve community character during the expedited approval process for projects issued De Minimis Waivers by the Commission. Since 2014, the Commission has decided to no longer process De Minimis Waivers for new residential projects in Venice in hopes that the City would properly address the concerns of the public with regards to the cumulative impacts of new residential development through the Local CDP process and through a more comprehensive approach. Through the local CDP process, the City of Los Angeles is able to address the public participation component of development projects by issuing public notices, holding public hearings and public comment periods for all such development projects in the Venice area, prior to Commission review.

The standard of review for the substantial issue determination is the Chapter 3 policies of the Coastal Act. The Coastal Act requires that the special communities be protected to preserve their unique characteristics and from negative impacts such as excessive building heights and bulks. In particular, Sections 30253(e) and 30251 of the Act, which state:

Section 30251.

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality on visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Section 30253(e).

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

In its 2001 certified Venice Land Use Plan (LUP), the Commission recognized Venice's unique community character and popularity as a visitor serving destination, and as such, it is imperative that any new development be designed consistent with the community character of the area. While the certified Venice LUP is not the standard of review for finding substantial issue, the LUP policies provide guidance from which the Commission can evaluate the adequacy of a project's mitigation of impacts. When the LUP was certified, the Commission considered how to ensure that future surrounding area would be visually compatible with the character of the surrounding area and adopted residential building standards (e.g. height limits) to ensure development was designed with pedestrian scale and compatibility with surrounding development. Given the specific conditions and the eclectic development pattern of Venice, it is appropriate to use the certified LUP policies for determining whether or not the project is consistent with relevant Chapter 3 policies of the Coastal Act.

The policies set forth by the certified Venice LUP echo the priority expressed in Coastal Act for preservation of the nature and character of existing residential neighborhoods:

Policy I. A. 2. Preserve Stable Single-Family Residential Neighborhoods.

Ensure that the character and scale of existing single-family neighborhoods is maintained and allow for infill development provided that it is compatible with and maintains the density, character and scale of the existing development...

Policy I. E. 1. General.

Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act.

Policy I. E. 2. Scale.

New development within the Venice Coastal Zone shall respect the scale and character of the community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods [...]

Policy I. E. 3. Architecture.

Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

As previously stated, the City found that the proposed project is consistent with Sections 30250(a), 30251, and 30252(1-4) of the Coastal Act, which, among other things, encourages that permitted development be visual compatible with the character of the surrounding areas.

The City's analysis, however, does not address the visual compatibility of the proposed project with the existing community character of the Oakwood neighborhood in Venice.

The appellants state that the project site is surrounded predominantly by one-story and two-story dwellings, and consequently, the appellants assert that the proposed two-story and three-story structures are not compatible with the mass and scale of the surrounding neighborhood. In addition, the appellants argue that the proposed project includes reduced yards and setbacks that are in contradiction with the LUP yard requirements and directly impact the mass and scale of the development. The appellants also argue that the proposed project will result in an adverse impact to the architectural diversity of Venice since the same architectural plans are being used for a similar residential project a few blocks away.

The question is whether or not the proposed project is compatible with the existing community character of the subject Oakwood neighborhood. The City's analysis does not provide information to support how the proposed project, especially the 30-foot high portions, is visually compatible with the existing community character. Consequently, the City's decision that the development is consistent with the Chapter 3 policies of the Coastal Act is not supported by the findings. Further review is required to determine whether or not the project conforms to the Chapter 3 policies of the Coastal Act. Therefore, a substantial issue exists with respect to the grounds of the appeal.

Other Contentions:

The appellants' appeal also raises the following issues:

1. The CEQA analysis and the Mello Act (affordable housing) determination are questionable.
2. The applicant has filed for an additional building permit for a major remodel and addition.
3. The proposed project involves the removal of long-standing trees, which will result in a cumulative impact to the characteristic of the Oakwood neighborhood.
4. Tandem parking will contribute to the parking congestion in the neighborhood.

The contentions relating to the City's California Environmental Quality Act (CEQA) and the Mello Act (affordable housing) determinations do not raise any Coastal Act issues. The Commission has no authority to review and invalidate a lead agency's CEQA determination or its Mello Act determination and thus, the appellants' contention does not constitute a substantial issue.

In addition to applying for the Local Coastal Development Permit for the proposed project, the appellants allege that the applicants have also submitted an exemption request for a major remodel and addition. The appellants have not appealed an exemption determination by the City for the project site and, consequently, there is no action to appeal at this time. This is not an issue before the Commission as part of this appeal, and does not raise a substantial issue.

Appeal –Substantial Issue

The appellants assert that the removal of long-standing trees will cumulatively impact the characteristic of the Oakwood neighborhood. The removal of trees on private residential property does not violate the policies of the Coastal Act providing that the vegetation is not considered environmentally sensitive habitat. There are no allegations that the existing residential landscaping at the project site provides habitat for protected bird nesting activities. In addition, the project site is over ½ of a mile inland from the beach and is within a highly urbanized residential area. Therefore, no substantial issue exists on this ground of the appeal.

Additionally, the appellants contend that the Local CDP subject to this appeal authorizes tandem parking that will contribute to the parking congestion in the neighborhood. Tandem parking allows for adequate on-site parking on narrow residential lots in Venice. The Coastal Commission has previously approved tandem parking as an acceptable practice to fulfill parking requirements in this area. This ground does not raise a substantial issue.

Conclusion

The City's Notice of Final Local Action for Local Coastal Development Permit (CDP) No. ZA-2014-1088 and accompanying staff reports and file records state that the City applied the policies of Chapter 3 of the Coastal Act and concluded, in part, that the development, as proposed and conditioned by the City, would be consistent with Chapter 3 of the Coastal Act and will not prejudice the ability of the City to prepare an LCP for the Venice Coastal Zone.

A substantial issue exists with respect to the project's conformance with Chapter 3 of the Coastal Act, and with the approval of the local coastal development permit, because the City-approved project does not adequately address the potential community character impacts of the development.

Only with careful review of the City-approved project can the Commission ensure that community character is protected. If it finds that a substantial issue exists, the Commission will have the opportunity to review and act on the project at the subsequent de novo hearing. Therefore, the Commission Staff recommends that the Commission find that a substantial issue exists with respect to the project's conformance with Chapter 3 of the Coastal Act, and with the approval of Local Coastal Development Permit No. ZA-2014-1088.

Applying the five factors listed in the prior section clarifies that the appeal raises a "substantial issue" with respect to Chapter 3 of the Coastal Act, and therefore, does meet the substantiality standard of Section 30265(b)(1).

The first factor is the degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. The City discussed consistency with the Venice Specific Plan, Los Angeles Municipal Code, and Venice Community Plan. The City did not substantially support the project's consistency with the community character provisions of the Coastal Act (Sections 30251 and 30253) and the Certified Venice LUP.

The second factor is the extent and scope of the development as approved or denied by the local government. The City-approved development is the demolition of a single-family residence and guest house, and the construction of two single-family residential units on two newly subdivided lots. Without an adequate analysis in the Local CDP evaluating the character of the immediate

community, however, the scope of these structures as compared to the existing residential development is uncertain.

The third factor is the significance of the coastal resources affected by the decision. The project can negatively impact the character of the surrounding community if it is not visually compatible and consistent with the surrounding development pattern. Therefore, the development could significantly and adversely affect coastal resources.

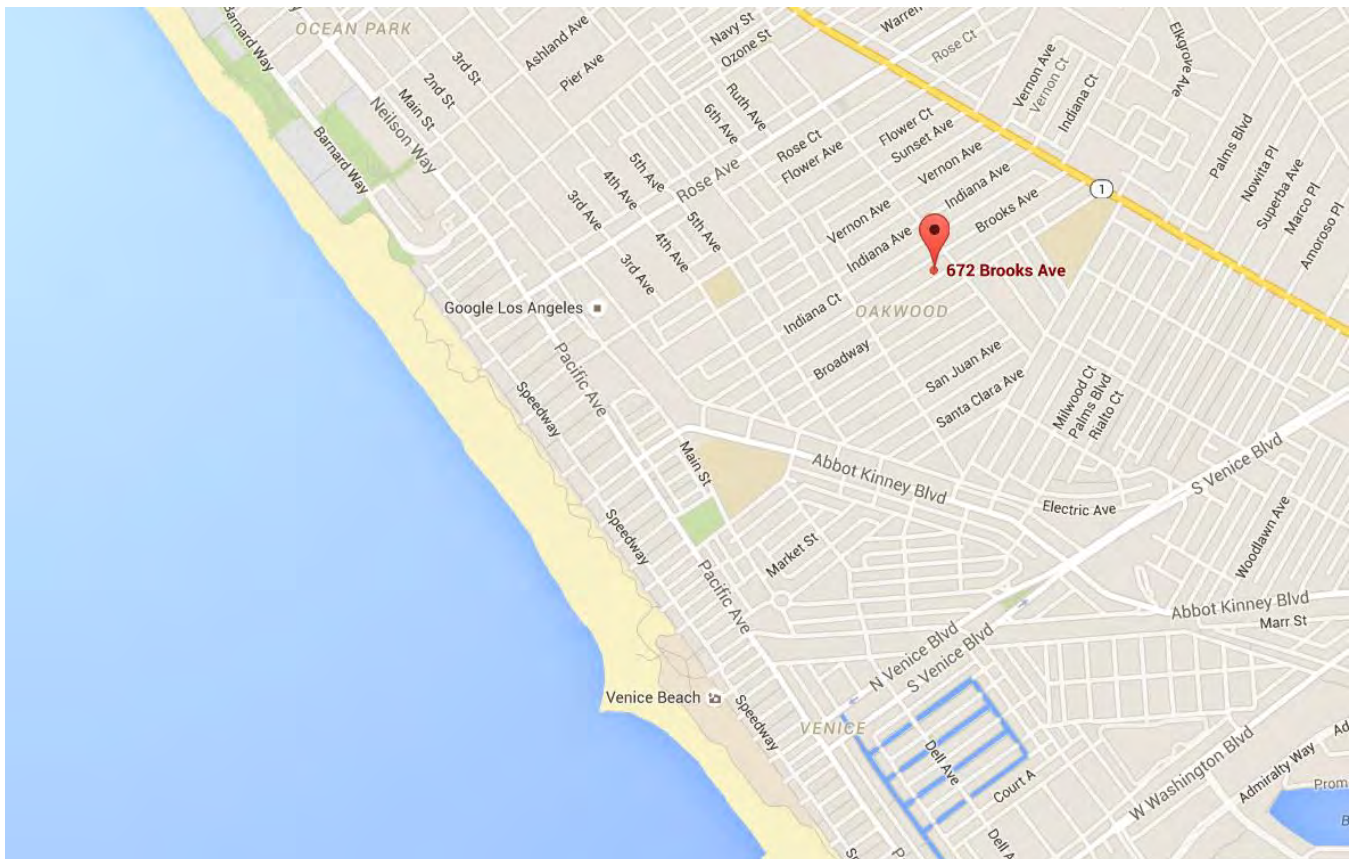
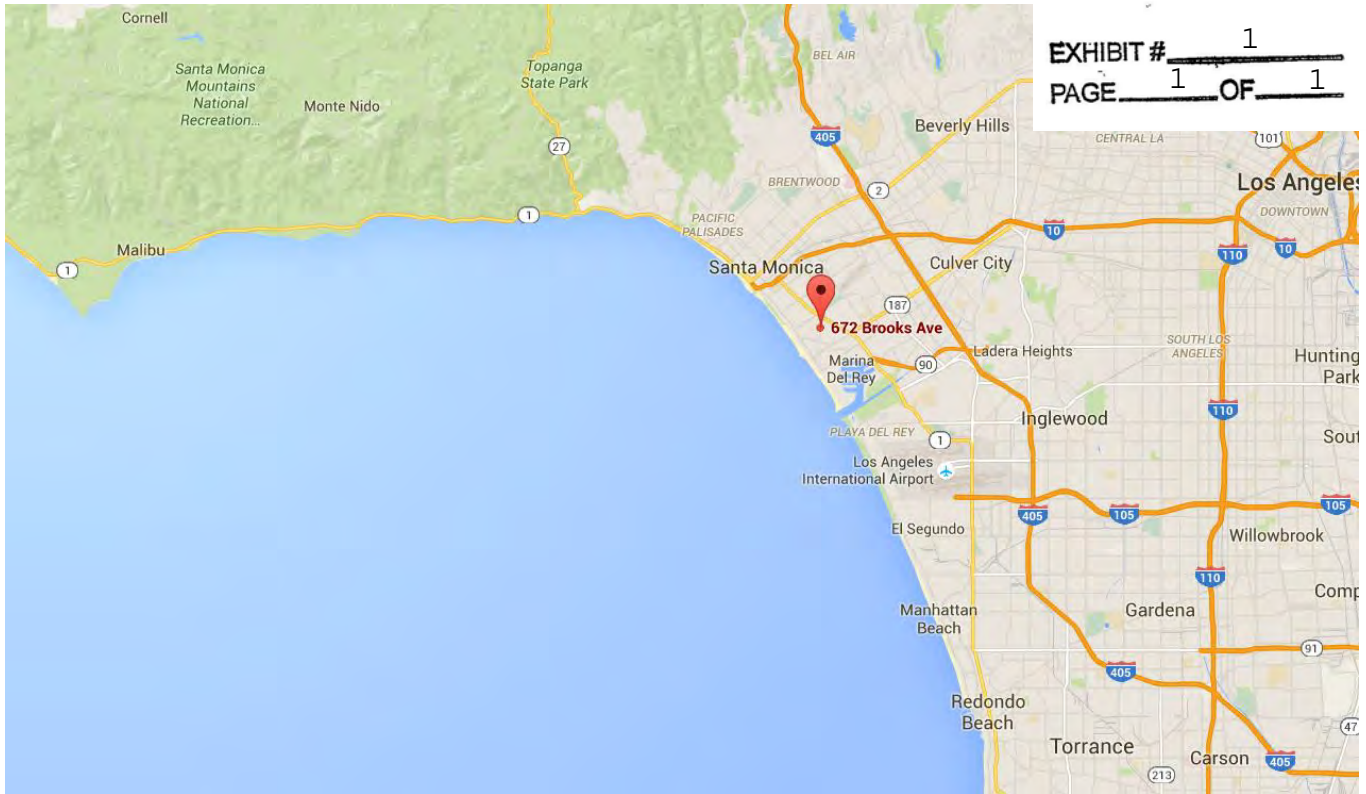
The fourth factor is the precedential value of the local government's decision for future interpretations of its LCP. The City does not currently have a certified LCP, but it does have a certified Land Use Plan (LUP). The appellants assert the proposed development is not consistent with the mass and scale of the existing structures in this area of Venice and with the policies of the certified Venice LUP. Without a finding to support otherwise, the project, as approved and conditioned, raises a substantial issue with regard to the project's potential non-conformity with the community character policies Chapter 3 of the Coastal Act and the certified Venice LUP, and the project's potential to set a negative precedent for future development.

The final factor is whether the appeal raises local issues, or those of regional or statewide significance. Impacts to coastal resources are important statewide issues, but this appeal also raises local issues. The City addressed CEQA with a CEQA Notice of Exemption, which concerns a local issue that does not raise a substantial issue. However, Venice is one of the most popular visitor destinations in the state making its preservation as an eclectic community with a unique character a statewide issue. Therefore, the City's approval does raise issues of statewide significance with regards to Venice's community character.

In conclusion, the issues for this appeal relate primarily to the potential impacts to the community character of Venice, compliance with CEQA, and Mello Act. The Commission has no jurisdiction to review local government's compliance with CEQA and Mello Act. In this case with regards to community character, the proposed project may not be in conformity with the Chapter 3 policies of the Coastal Act. Therefore, Commission staff recommends that the Commission find that the appeal raises a substantial issue as to conformity with Chapter 3 policies.

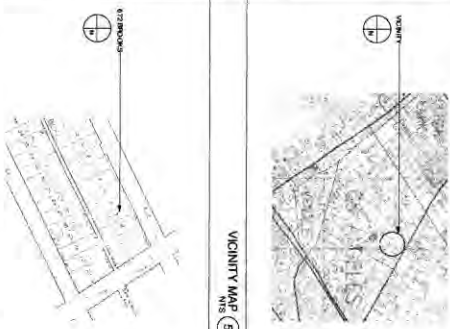
COASTAL COMMISSION

EXHIBIT # 1
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GENERAL NOTES (6)



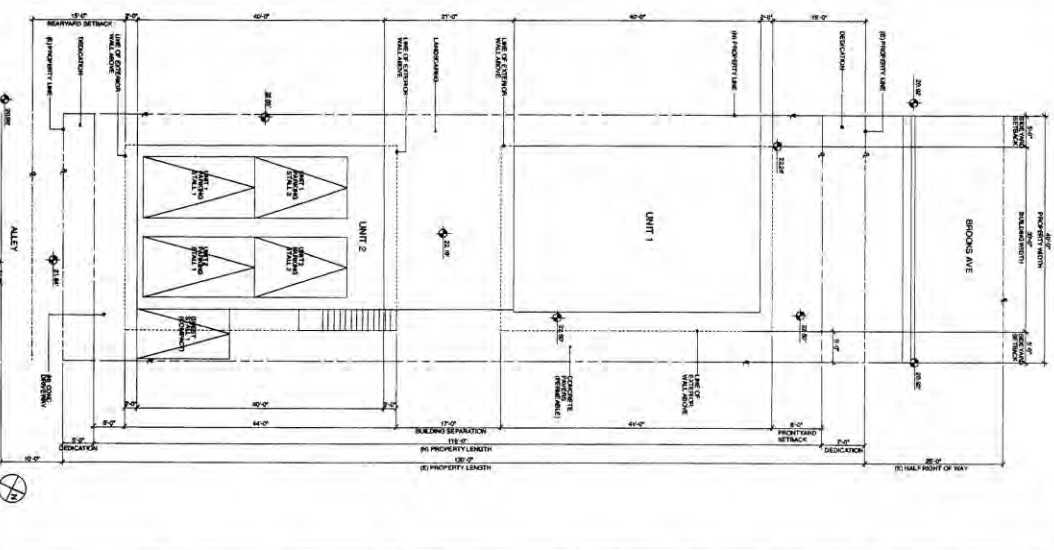
LOCATION MAP (4) NTS



SHEET INDEX (3)

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PROJECT DATA (2)



PLOT PLAN / SITE PLAN (1)

PROJECT
672
BROOKS

DeBerg/Universal
and Printing and Design

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940 COLBY AVE.
LOS ANGELES, CA 90024
PH: 213 622 2425

EXHIBIT A

[illegible]

A-0.0

ZA 2014-1088


$$\frac{u}{c}$$

ERIN C. RUSSELL, 6200 WEST 21ST

[illegible]

DATE	DESIGNER	SCALE
12/20/2013	WJG	1" = 1'-0"

A-2.2

RECEIVED
South Coast RegionEXHIBIT # 3
PAGE 1 OF 16

STATE OF CALIFORNIA - THE RESOURCES AGENCY

CALIFORNIA COASTAL COMMISSION

SEP 15 2015

SOUTH COAST DISTRICT OFFICE
200 OCEANGATE, 10TH FLOOR
LONG BEACH, CA 90802-4418
VOICE (562) 590-5071 FAX (562) 590-5084CALIFORNIA
COASTAL COMMISSION**APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT****Please Review Attached Appeal Information Sheet Prior To Completing This Form.****SECTION I. Appellant(s)**

Name: Robin Rudisill, as an individual & not on behalf of the VNC or its LUPC, et al (see attached)

Mailing Address: 3003 Ocean Front Walk

City: Venice

Zip Code: CA

Phone: 90291

SECTION II. Decision Being Appealed

1. Name of local/port government:

Los Angeles

2. Brief description of development being appealed:

Preliminary Parcel Map for a Small-Lot Subdivision to subdivide one lot into two "small lots" with one dwelling unit on each lot, and a Mello Act Determination. The CDP for the Small Lot Subdivision includes a request for reduction in yards for the Small-Lot Subdivision

3. Development's location (street address, assessor's parcel no., cross street, etc.):

672 Brooks Ave, APN: 423-901-2004, cross street 7th Ave

4. Description of decision being appealed (check one.):

- ☒ Approval; no special conditions
☐ Approval with special conditions:
☐ Denial

Note: For jurisdictions with a total LCP, denial decisions by a local government cannot be appealed unless the development is a major energy or public works project. Denial decisions by port governments are not appealable.**TO BE COMPLETED BY COMMISSION:**

APPEAL NO:

A-S-Ven-15-0059

DATE FILED:

9.15.15

DISTRICT:

South Coast

672 Brooks Ave
CDP Appeal
ZA-2014-1088-CDP-ZAA-MEI.
APPELLANTS

Robin Rudisill, as an individual and not on behalf of the VNC or its LUPC
3003 Ocean Front Walk
Venice, CA 90291

Todd Darling, as an individual and not on behalf of the VNC or its LUPC
2206 Louella Ave
Venice, CA 90291

Pam Anderson
615 San Juan Ave
Venice, CA 90291

Lydia Ponce
837 1/2 Milwood Ave
Venice, CA 90291

Sue Kaplan, as an individual and not on behalf of the VNC or its Ad Hoc Committee on
Mass, Scale and Character
763 Nowita Place
Venice, CA 90291

George Gineris, as an individual and not on behalf of the VNC or its Ad Hoc Committee
on Mass, Scale and Character
256 Horizon Ave
Venice, CA 90291

Ivonne Guzman
762 Sunset Ave
Venice, CA 90291

Laddie Williams
San Juan Ave
Venice, CA 90291

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- ☒ Planning Director/Zoning Administrator
☐ City Council/Board of Supervisors
☐ Planning Commission
☐ Other

6. Date of local government's decision: July 17, 20157. Local government's file number (if any): ZA-2014-1088-CDP-ZAA-MEL**SECTION III. Identification of Other Interested Persons**

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

Kambiz Kamdar, Vernon Development LLC, 528 Palisades Drive, #530, Pacific Palisades, CA 90272
and
Kamran Kazemi, Tala Associates, 1916 Colby Ave, L.A., CA 90025

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

(1)

(2)

(3)

(4)

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)**SECTION IV. Reasons Supporting This Appeal****PLEASE NOTE:**

- Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section.
- 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.)
- This 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.

The L.A. General Plan's Venice Community Plan Venice Land Use Plan (certified by the Coastal Commission) ("LUP") Preservation of Venice as a Special Coastal Community, Policy I. E. 1. General states: "Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3...."

LUP Policy I. E. 2. Scale states: "All new development....should respect the Scale, Massing, and Landscape of existing residential neighborhoods ..."

LUP Policy I. E. 3. Architecture sHi Gary

tates: Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing."

LUP Policy I. A. 7. Multi-Family Residential - Low Medium II Density. d. requires yards in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.

Section 30116 of the Coastal Act requires special consideration for development in "Sensitive Coastal Resource Areas," which means those identifiable and geographically bounded land and water areas within the Coastal Zone of vital interest and sensitivity, and which includes areas possessing significant recreational value and "special communities or neighborhoods which are significant visitor destination areas;" and the Coastal Commission has identified Venice as such a community of neighborhoods that is special and unique in the Coastal Zone.

Section 30251 of Article 6 of Chapter 3 of the Coastal Act states: "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, ...to be visually compatible with the character of surrounding areas..."

Section 30253(e) of Article 6 of Chapter 3 states: "Where appropriate, protect special communities that, because of their unique characteristics, are popular visitor destination points for recreational uses."

In consideration of the above requirements as well as the facts below, the proposed

development would cause a significant adverse cumulative impact on the Scale, Mass & Character of the existing surrounding neighborhood and thus the Subarea of Oakwood and thus the Venice Community, and therefore Findings 1, 2, and 3, of the City CDP cannot be made.

The Venice Community has already been identified in its LUP (part of the L.A. General Plan and Venice Community Plan) and by the California Coastal Commission in numerous reports and permit-related documents, as a "significant and popular visitor destination," and a "community to be protected."

The Venice Community Character is made up of the character of its distinct and unique Neighborhoods. Thus, the compatibility of the project with the Scale, Mass and Character of the surrounding existing neighborhood must be considered.

This project provides a good exercise for the analysis of the cumulative impact of the removal of long-standing trees in the Oakwood neighborhood. Oakwood is known as a neighborhood with many beautiful trees, in fact, this is one of the distinguishing characteristics of the Oakwood Community and its neighborhoods. This is a critical "Land Resources" issue under Chapter 3. For this project, one 20" pine tree has been identified for demolition. Although the MND states that a mitigating factor for the loss of these significant-sized trees is that they should be replaced one-for-one with a minimum 24" box tree, there is no condition on the CDP requiring this. Even if there were, it is clear that a 24" box tree does not adequately replace these large, mature, long-standing trees that make up the eco-system as well as the beauty of Oakwood, as they are just a few feet tall and would take years, possibly decades to reach the size and beauty of the current tree slated for removal. The cumulative impact of such tree removal without adequate or meaningful mitigation, such as for this project, is to remove an unacceptably significant amount of trees from this Community, without adequate mitigation.

The architectural diversity of this project is also issue. The Applicant has a project just a couple of blocks away, at 665 Vernon Ave, that uses the same architectural plans and general style, which is in contradiction to the policies above with respect to protecting Venice's unique architectural diversity. This kind of thing might be an efficient way of handling development in "Suburbia," but should not be done in a unique and special Coastal Community that is unique and special in large part due to its architectural and social diversity.

The side yards are 5' as per the Small-Lot Subdivision ordinance, which is less than what is required as per the LAMC for a 3-story structure, of 6'. This reduced side yard, in conjunction with the reduced front and rear yards for the project are in contradiction with the LUP yard requirements noted above.

Parking is tandem for both homes of the Small-Lot Subdivision, which will contribute to the parking congestion in this neighborhood and therefore impact Access to this Special Coastal Community. See attached.

In general, the cumulative impact of 3-story structures with maxed out square footage and with very little space left between the structures and the lot lines is to ruin a Community such as Venice, which is special and unique due to the character of its neighborhoods. Visitors come to Venice to see its special neighborhoods, each with its own unique and diverse architecture and general character, and a materially out-of-scale home with maxed

out square footage in the middle of a beautiful coastal neighborhood of mainly 1 and 2-story homes, is a big eye sore. The Coastal Act provisions and LUP policies are in place to protect these neighborhoods from significant changes in their character, as developers would increase the size of the structures to the maximum extent possible in the absence of such policies and restrictions, in order to maximize profits.

The CEQA analysis performed is questionable as it does not adequately provide mitigations and does not adequately analyze the cumulative impact of the project. In addition, the affordable housing issues, which fall under both CEQA and the Mello Act, both state law, may not have been handled correctly. Given the unavailability of housing data as well as income data, the default should have been to declare both units affordable, as is the policy of HCID. Also, the HCID letter indicates that the decisions made and conclusions reached were based on information provided by the developer and not on adequate/independent supporting documentation, which is both a CEQA issue (Environment/Population/Housing/Affordable Housing) and a Mello Act issue. Also, the Mello Determination may not have been legal/according to City Interim Administrative Procedures as it did not entail a right to appeal.

By not properly enforcing and considering the Scale, Mass and Character of its individual neighborhoods, the City has abdicated responsibility to the citizens of the surrounding neighborhoods for this, which is not fair or right.

In addition, a review of the building permits indicates that the Applicant has now filed for a Building Permit for a major remodel and addition for both SFD's. It looks like the plan is to do the lot subdivision and then build both SFD's using Coastal Exemptions, and bypass the CDP process. This is a guess, but if that is true this should not be allowed by the Coastal Commission for a Small-Lot Subdivision project.

Please insist on proper analysis of compatibility of developments to the unique and special neighborhoods of the Venice Community. Venice is one of the few remaining Coastal Communities in the State, and should be protected as a resource of great importance to the State and its Coastal Zone.

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

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: September 15, 2015

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

Section VI. Agent Authorization

I/We hereby
authorize

to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date:



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672 E BROOKS AVE LOT 2 90291
APPLICATION / PERMIT NUMBER: 14010-10000-01433
PLAN CHECK / JOB NUMBER: B14LA06039

Plan Check and Permit Information

GROUP: Building
TYPE: Bldg-New
SUB-TYPE: 1 or 2 Family Dwelling
PRIMARY USE: (1) Dwelling - Single Family
WORK DESCRIPTION: PROPOSE 30'X44' THREE STORY SFD; CONSIST OF TWO STORY DWELLING OVER 4 CAR GARAGE (2 CAR PARKING FOR LOT 1 & 2 CAR PARKING FOR LOT 2)
PERMIT ISSUED: No **PERMIT ISSUE DATE:** N/A **ISSUING OFFICE:** N/A
CURRENT STATUS: Verifications in Progress **CURRENT STATUS DATE:** 09/01/2015

Permit Application Status History

Submitted	05/09/2014	APPLICANT
Assigned to Plan Check Engineer	06/29/2014	DAWN MC NULTY
Corrections Issued	06/09/2014	DAWN MC NULTY
Grain Plans Picked Up	06/16/2014	APPLICANT
Reviewed by Supervisor	06/23/2014	BILL STUTSMAN
Building Plans Picked Up	06/27/2014	APPLICANT
Applicant returned to address corrections	10/06/2014	DAWN MC NULTY
Applicant returned to address corrections	09/01/2015	DAWN MC NULTY

Permit Application Clearance Information

Specific Plan	Not Cleared	06/03/2014	DAWN MCNULTY
Coastal Zone	Not Cleared	06/03/2014	DAWN MCNULTY
Eng Process Fee Ord 175,300	Not Cleared	06/03/2014	DAWN MCNULTY
Highway dedication	Not Cleared	06/03/2014	DAWN MCNULTY
Hydrant and Access approval	Not Cleared	06/03/2014	DAWN MCNULTY
Miscellaneous	Not Cleared	06/03/2014	DAWN MCNULTY
Permit	Not Cleared	06/03/2014	DAWN MCNULTY
Roof/Waste drainage to street	Not Cleared	06/03/2014	DAWN MCNULTY
Sewer availability	Not Cleared	06/03/2014	DAWN MCNULTY
Specific Plan	Not Cleared	06/03/2014	DAWN MCNULTY
Tract Map conditions	Not Cleared	06/03/2014	DAWN MCNULTY
ZA Case	Not Cleared	06/03/2014	DAWN MCNULTY
ZI	Not Cleared	06/03/2014	DAWN MCNULTY
Green Code	Not Cleared	06/09/2014	MARCUS LEVIAS
Miscellaneous	Not Cleared	06/23/2014	BILL STUTSMAN
Address approval	Cleared	06/04/2014	DAVID PEREZ
Low Impact Development	Cleared	09/18/2014	IDA MEISAM-FARD
Miscellaneous	Not Cleared	09/01/2015	DAWN MC NULTY

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Licensed Professional/Contractor Information

No data available

Inspection Activity Information

Inspector Information

No data available

Pending Inspection Request(s)

No data available

Inspection Request History

No data available

DATA: [NEW SEARCH](#)

672 E BROOKS AVE LOT 1 90291
APPLICATION / PERMIT NUMBER: 14010-10000-01432
PLAN CHECK / JOB NUMBER: B14LA06039

Plan Check and Permit Information

GROUP:	Building	PERMIT ISSUE DATE:	N/A	ISSUING OFFICE:	N/A
TYPE:	Bldg-New	CURRENT STATUS DATE:	08/01/2015		
SUB-TYPE:	1 or 2 Family Dwelling				
PRIMARY USE:	(1) Dwelling - Single Family				
WORK DESCRIPTION:	PROPOSE 30'x44' TWO STORY SFD WITH OPEN ROOF DECK				
PERMIT ISSUED:	No				
CURRENT STATUS:	Verifications in Progress				

Permit Application Status History

Application Status History		
Submitted	05/09/2014	
Assigned to Plan Check Engineer	05/28/2014	APPLICANT
Corrections Issued	06/09/2014	DAWN MC NULTY
Green Plans Picked Up	06/16/2014	DAWN MC NULTY
Reviewed by Supervisor	06/23/2014	APPLICANT
Building Plans Picked Up	08/27/2014	BILL STUTSMAN
Applicant returned to address corrections	10/06/2014	APPLICANT
Applicant returned to address corrections	09/01/2015	DAWN MC NULTY
		DAWN MC NULTY

Permit Application Clearance Information

Permit Clearance Information			
Coastal Zone	Not Cleared	06/03/2014	DAWN MCNULTY
Eng Process Fee Ord 175,390	Not Cleared	06/03/2014	DAWN MCNULTY
Highway dedication	Not Cleared	06/03/2014	DAWN MCNULTY
Hydrant and Access approval	Not Cleared	06/03/2014	DAWN MCNULTY
Miscellaneous	Not Cleared	06/03/2014	DAWN MCNULTY
Roof/Waste drainage to street	Not Cleared	06/03/2014	DAWN MCNULTY
Sewer availability	Not Cleared	06/03/2014	DAWN MCNULTY
Specific Plan	Not Cleared	06/03/2014	DAWN MCNULTY
Tract Map conditions	Not Cleared	06/03/2014	DAWN MCNULTY
ZA Case	Not Cleared	06/03/2014	DAWN MCNULTY
ZI	Not Cleared	06/03/2014	DAWN MCNULTY
Green Code	Not Cleared	06/03/2014	DAWN MCNULTY
Miscellaneous	Not Cleared	06/09/2014	MARCUS LEVIAS
Address approval	Cleared	06/23/2014	BILL STUTSMAN
Permit	Cleared	09/04/2014	DAVID PEREZ
Low Impact Development	Cleared	09/04/2014	DAVID PEREZ
Miscellaneous	Not Cleared	09/18/2014	IDA MEISAMI-FARD
		09/01/2015	DAWN MC NULTY

Licensed Professional/Contractor Information

Inspection Activity Information

Inspector Information

No data available

Pending Inspection Request(s)

No data available

Inspection Request History

No data available



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672 E BROOKS AVE 90291**APPLICATION / PERMIT NUMBER: 15014-30000-02281****PLAN CHECK / JOB NUMBER: B15WL02738**

Plan Check and Permit Information

GROUP: Building
TYPE: Bldg-Addition
SUB-TYPE: 1 or 2 Family Dwelling
PRIMARY USE: (1) Dwelling - Single Family
WORK DESCRIPTION: Major remodel and addition to an (e) sfd (front) "A". ***2 out of 2 ***
PERMIT ISSUED: No **PERMIT ISSUE DATE:** N/A **ISSUING OFFICE:** N/A
CURRENT STATUS: Reviewed by Supervisor **CURRENT STATUS DATE:** 06/19/2015

Permit Application Status History

Submitted	05/27/2015	APPLICANT
Assigned to Plan Check Engineer	06/10/2015	TARIK SAOUD
Corrections Issued	06/14/2015	TARIK SAOUD
Reviewed by Supervisor	06/19/2015	SHAHEN AKELYAN
Building Plans Picked Up	06/19/2015	APPLICANT
Green Plans Picked Up	06/19/2015	APPLICANT

Permit Application Clearance Information

Green Code	Not Cleared	06/09/2015	RICHARD GARCIA
Coastal Zone	Not Cleared	06/15/2015	TARIK SAOUD
Eng Process Fee Ord 176.300	Not Cleared	06/15/2015	TARIK SAOUD
Low Impact Development	Not Cleared	06/15/2015	TARIK SAOUD
Miscellaneous	Not Cleared	06/15/2015	TARIK SAOUD
Roof/Waste drainage to street	Not Cleared	06/15/2015	TARIK SAOUD
Sewer availability	Not Cleared	06/15/2015	TARIK SAOUD
Specific Plan	Not Cleared	06/15/2015	TARIK SAOUD
ZA Case	Not Cleared	06/15/2015	TARIK SAOUD

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Licensed Professional/Contractor Information

Engineer Information

Javed-Koma, Shahram; Lic. No.: C69497
 10348 MONTGOMERY AVE
 GRANADA HILLS, CA 91403

Inspection Activity Information

Inspector Information

No data available

Pending Inspection Request(s)

No data available

Inspection Request History

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Tue Sep 15, 4:10 PM

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672 1/2 E BROOKS AVE 90291**APPLICATION / PERMIT NUMBER: 15014-30000-02280****PLAN CHECK / JOB NUMBER: B15WL02738**

Plan Check and Permit Information

GROUP:	Building		
TYPE:	Bldg-Addition		
SUB-TYPE:	1 or 2 Family Dwelling		
PRIMARY USE:	(1) Dwelling - Single Family		
WORK DESCRIPTION:	Major remodel and addition to an (e) sld "B" (rear) ***** 1 out of 1 *****		
PERMIT ISSUED:	No	PERMIT ISSUE DATE:	N/A
CURRENT STATUS:	Reviewed by Supervisor	CURRENT STATUS DATE:	06/19/2015
		ISSUING OFFICE:	N/A

Permit Application Status History

Submitted	05/27/2015	APPLICANT
Assigned to Plan Check Engineer	06/10/2015	TARIK SAOUD
Corrections Issued	06/14/2015	TARIK SAOUD
Reviewed by Supervisor	06/18/2015	SHAHEN AKELYAN
Building Plans Picked Up	06/19/2015	APPLICANT
Green Plans Picked Up	06/19/2015	APPLICANT

Permit Application Clearance Information

Green Code	Not Cleared	06/09/2015	RICHARD GARCIA
Coastal Zone	Not Cleared	06/15/2015	TARIK SAOUD
Eng Process Fee Ord 176,300	Not Cleared	06/15/2015	TARIK SAOUD
Green Code	Not Cleared	06/15/2015	TARIK SAOUD
Low Impact Development	Not Cleared	06/15/2015	TARIK SAOUD
Miscellaneous	Not Cleared	06/15/2015	TARIK SAOUD
Root/Waste drainage to street	Not Cleared	06/15/2015	TARIK SAOUD
Sewer availability	Not Cleared	06/15/2015	TARIK SAOUD
Specific Plan	Not Cleared	06/15/2015	TARIK SAOUD
ZA Case	Not Cleared	06/15/2015	TARIK SAOUD

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Licensed Professional/Contractor Information

Engineer Information

Javadi-Koma, Shahram; Lic. No.: C69497
10349 MONTGOMERY AVE
GRANADA HILLS, CA 91403

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672 1/2 E BROOKS AVE 90291

APPLICATION / PERMIT NUMBER: 09016-10000-13851

PLAN CHECK / JOB NUMBER: B09LA08256

Plan Check and Permit Information

GROUP: Building
TYPE: Blog-Alter/Repair
SUB-TYPE: 1 or 2 Family Dwelling
PRIMARY USE: (1) Dwelling - Single Family
WORK DESCRIPTION: CONVERT EXISTING 407 SF GARAGE INTO DWELLING UNIT. "COMPLY WITH DEPARTMENT ORDER effective date 05/18/2008. PERMIT WILL EXPIRE 30 DAYS FROM ISSUANCE DATE".
PERMIT ISSUED: Yes **PERMIT ISSUE DATE:** 01/19/2010 **ISSUING OFFICE:** Metro
CURRENT STATUS: COLO Issued **CURRENT STATUS DATE:** 03/11/2015

Permit Application Status History

Submitted	09/31/2009	APPLICANT
Assigned to Plan Check Engineer	09/04/2009	SHABNAM SHAHRIARI
Plans on Hold	09/23/2009	BILL STUTSMAN
Building Plans Picked Up	09/25/2009	APPLICANT
Hold Released	09/30/2009	SHABNAM SHAHRIARI
Corrections Issued	09/30/2009	SHABNAM SHAHRIARI
Reviewed by Supervisor	10/01/2009	SHAHEN AKELYAN
Applicant returned to address corrections	11/17/2009	SHABNAM SHAHRIARI
Applicant returned to address corrections	12/10/2009	SHABNAM SHAHRIARI
Applicant returned to address corrections	12/29/2009	SHABNAM SHAHRIARI
Applicant returned to address corrections	01/13/2010	SHABNAM SHAHRIARI
Applicant returned to address corrections	01/15/2010	SHABNAM SHAHRIARI
Plan Check Approved	01/19/2010	SHABNAM SHAHRIARI
Issued	01/19/2010	LADBS
COLO in Progress	02/24/2015	DAVID MATSON
Permit Finalized	03/11/2015	ANDREW LONGORIA
COLO Issued	03/11/2015	ANDREW LONGORIA
Permit Finalized	03/11/2015	ANDREW LONGORIA

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Permit Application Clearance Information

Address approval	Cleared	11/03/2009	DAVID CHIN
Eng Process Fee Ord 176,300	Cleared	11/03/2009	JAMES MORALES
Sewer availability	Cleared	11/03/2009	JAMES MORALES
Highway dedication	Cleared	12/30/2008	LUIS CRUZ
Specific Plan	Cleared	01/11/2010	ANGELA TRINH
ZI	Cleared	01/11/2010	ANGELA TRINH
CZCA Overl Pmt/Maiver/Del/Maivia	Cleared	01/12/2010	JACK CHIANG
Specific Plan	Cleared	01/13/2010	PEDRO AYALA
Zoning Information File	Not Cleared	01/27/2010	KRYSTIE SERRANO
Hold	Cleared	02/02/2010	KRYSTIE SERRANO
Hold	Cleared	02/06/2010	KRYSTIE SERRANO

Licensed Professional/Contractor Information

Contractor Information

Homeworks Construction & Design, Lic. No.: 841888-B
 1641 RICHMON AVE
 DOWNEY, CA 90240

Engineer Information

Gurey, Olan Garzon, Lic. No.: C40730
 5545 PIERCY AVE
 LAKEWOOD, CA 90712

Inspection Activity Information

Inspector Information

PEDRO RIVERA, (310) 417-8663
 Office Hours: 7:00-8:00 AM MON-FRI
 ROBERT GARTH, (310) 417-8663



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672-672 1/2 E BROOKS AVE 90291

APPLICATION / PERMIT NUMBER: 14019-20000-02240

PLAN CHECK / JOB NUMBER: B14VN08677

Plan Check and Permit Information

GROUP: Building
TYPE: Bldg-Demolition
SUB-TYPE: 1 or 2 Family Dwelling
PRIMARY USE: (1) Dwelling - Single Family
WORK DESCRIPTION: Demolition permit to demolish existing one story single family dwelling and detached garage
PERMIT ISSUED: Yes **PERMIT ISSUE DATE:** 07/16/2014 **ISSUING OFFICE:** West LA
CURRENT STATUS: Issued **CURRENT STATUS DATE:** 07/16/2014

Permit Application Status History

Submitted	07/16/2014	APPLICANT
Assigned to Plan Check Engineer	07/16/2014	HARLEN CARRAHER
Plan Check Approved	07/16/2014	CHRISTINE MAALOUF
Issued	07/16/2014	LADBS

Permit Application Clearance Information

Demolition Pres. Coord. appr.	Cleared	07/16/2014	HARLEN CARRAHER
-------------------------------	---------	------------	-----------------

Licensed Professional/Contractor Information

Contractor Information

Ark Construction & Development Inc; Lic. No.: 438036-B
 528 PALISADES DR # 530
 PACIFIC PALISADES, CA 90272

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Inspection Activity Information

Inspector Information

BOB DUNN, (310) 914-3981
 Office Hours: 7:00-8:00 AM MON-FRI

Pending Inspection Request(s)

No data available

Inspection Request History

No data available

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Eric Garcetti, Mayor
Merrilee M. Murphy, General Manager

Date: March 4, 2014
To: Greg Shoop, City Planner
City Planning Department
From: Robert Manford, Environmental Affairs Officer
Los Angeles Housing and Community Investment Department
Subject: Mello Act Determination for
672-672 1/2 Brooks Avenue, Venice, CA 90291

Based on information provided by the owner, Brooks Development LLC, a California limited liability Company, the Los Angeles Housing and Community Investment Department (HCIDLA) has determined that no affordable units exist at 672-672 1/2 Brooks Avenue Venice, CA 90291

The property consists of a duplex dwelling comprised of (2) bedrooms. One of the dwelling units is a garage that was converted to a studio unit. Per the statement provided by the owner, they will demolish the duplex dwelling and construct another duplex dwelling. Brooks Development LLC purchased the property on September 20, 2013 and has not applied for a Building Permit.

Section 4.4.3 of the Interim Administrative Procedures for Complying with the Mello Act requires that HCIDLA collect monthly housing cost data for at least the previous three years. The owner's Mello application statement was received by HCIDLA on February 5, 2014. HCIDLA must collect data from: February, 2011 through February, 2014.

Per the owner, the property was vacant when acquired and still remains vacant. Utility bills were provided to reflect the owner as the registered user. Section 4.4.3 of the Interim Administrative Procedures for Complying with the Mello Act could not be applied since there was no rental data submitted for the previous three years. However, the current owner obtained a lease agreement from the previous owner who had rented the property from May 2012 to April 2013 with a housing cost of \$4,000 per month. HCIDLA sent the required 30-day letter to the property, however no forms were returned.

The utility bills indicate that property is currently a non-rental and the lease agreement showed a pattern of housing cost that was above affordable.

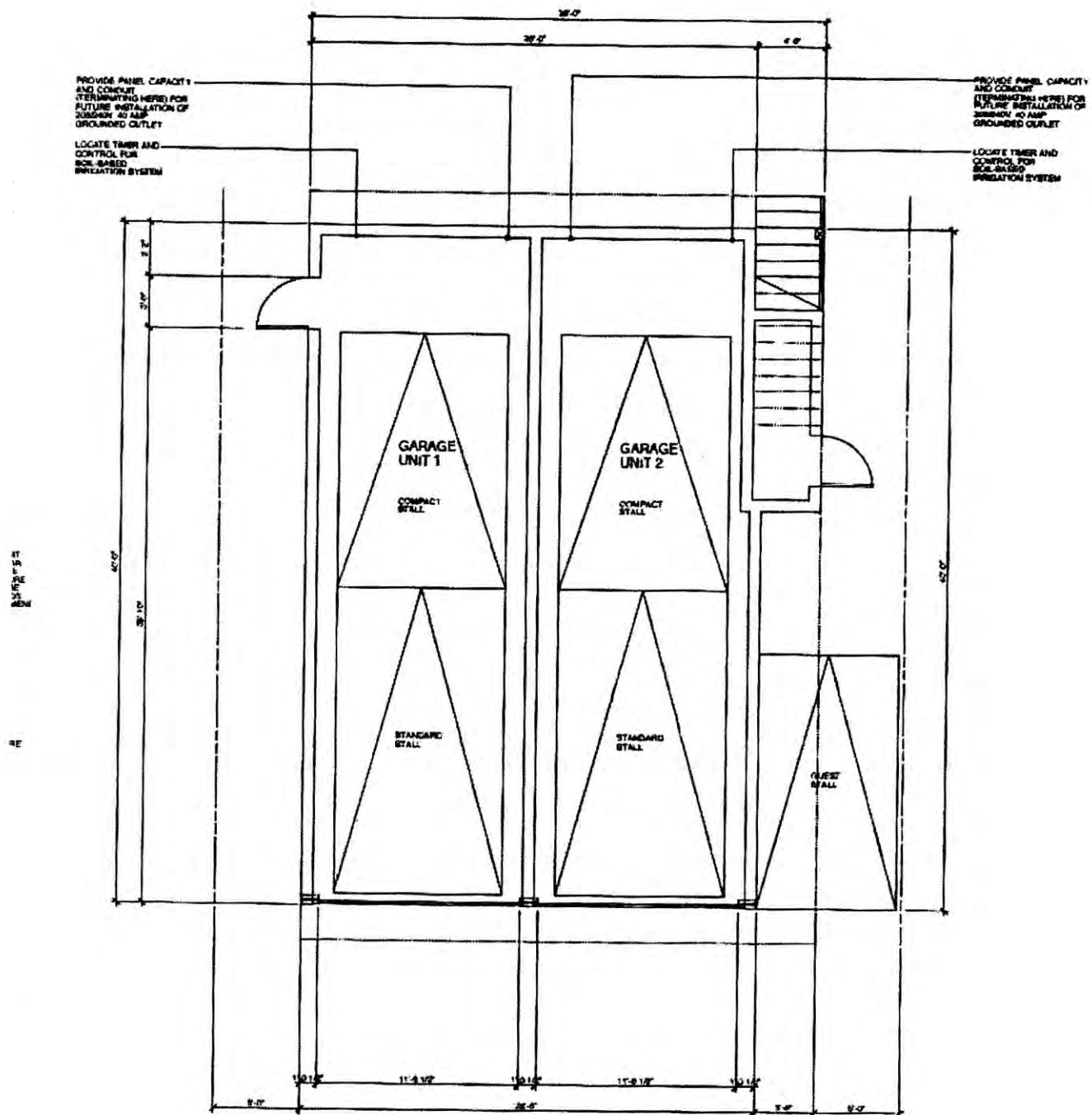
cc: Los Angeles Housing and Community Investment Department File
Brooks Development LLC, a California limited liability Company, Owner
Richard A. Rothschild, Western Center on Law and Poverty, Inc.
Susanne Browne, Legal Aid Foundation of LA

RM:MAC:RB:n

legally? (no)

Not
legally

Inadequate
Sh. de fault
to [unclear]



DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

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MARTA SEGURA

JAMES K. WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

COASTAL COMMISSION

EXHIBIT # 4
PAGE 1 OF 10

(213) 978-1271

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
<http://planning.lacity.org>

NOTICE OF PERMIT ISSUANCE

Date: August 11, 2015
TO: California Coastal Commission
FROM: City of Los Angeles Advisory Agency
SUBJECT: **Parcel Map No. AA-2014-1086-PMLA-SL and
Coastal Development Permit No. ZA-2014-1088(CDP)(ZAA)(MEL)**

RECEIVED
South Coast Region
AUG 17 2015
CALIFORNIA
COASTAL COMMISSION

Pursuant to a June 10, 2015 hearing for Coastal Development Permit located at 672 East Brooks Avenue, the Deputy Advisory Agency's July 17, 2015 approval of Parcel Map No. AA-2014-1086-PMLA-SL and Coastal Development Permit No. ZA 2014-1088(CDP)(ZAA)(MEL) became final and in effect on August 3, 2015 and not subject to any appeals. Unless an appeal has been filed with your office after Commission receipt of the enclosed Letter of Determination the action on Coastal Development Permit No. ZA 2014-1088(CDP)(ZAA)(MEL) should also become final and effective 20 days after receipt of the enclosures.

Note: Project is in the single permit jurisdiction area.

JOSE CARLOS ROMERO-NAVARRO
Deputy Advisory Agency

JRN:thb

cc: Applicant's representative

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LINN K. WYATT
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

JACK CHIANG
LOURDES GREEN
THEODORE L. IRVING
CHARLES J. RAUSCH, JR.
JIM TOKUNAGA
FERNANDO TOVAR
DAVID S. WEINTRAUB
MAYA E. ZAITZEVSKY

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

MICHAEL J. LOGRANDE
DIRECTOR

OFFICE OF
ZONING ADMINISTRATION

200 N. SPRING STREET, 7TH FLOOR
LOS ANGELES, CA 90012
(213) 978-1318
FAX: (213) 978-1334
www.planning.lacity.org

July 17, 2015

Kambiz Kamdar (A)
528 Palisades Drive, #530
Pacific Palisades, CA 90272

Kamran Kazemi (R)
Tala Associates
1916 Colby Avenue
Los Angeles, CA 90025

CASE NO. ZA 2014-1088(CDP)(ZAA)(MEL)
COASTAL DEVELOPMENT PERMIT,
ZONING ADMINISTRATOR'S ADJUSTMENT
Related Case: AA-2014-1086-PMLA-SL
672 East Brooks Avenue
Venice Planning Area
Zone : RD1.5-1
D. M. : 111B145
C. D. : 11
CEQA: ENV-2014-1087-MND
Legal Description: Lot 3, Block K, Ocean
Park Villa Tract

Pursuant to Los Angeles Municipal Code Section 12.28, I hereby DISMISS:

A Zoning Administrator Adjustment for 'early start construction' to permit a front yard prevailing setback of 8 feet in lieu of the required 15 feet; and a rear yard setback of 5 feet in lieu of the required 15 feet; also, an adjustment to permit a subdivision with less than the required minimum lot area of 5,000 square feet after dedication;

The adjustments that were required for 'early start construction' at the time of filing, are no longer required. Revisions to small lot procedures (Ordinance No. 183,165), signed by the Mayor on August 5, 2014, resulted in no need for Zoning Administrator Adjustments (ZAA) for 'early start construction' for small lot cases. Furthermore, the adjustment for minimum lot area is not required due to the fact that the property is a legal nonconforming lot.

Pursuant to Los Angeles Municipal Code Section 12.20.2, I hereby APPROVE:

a Coastal Development Permit for the demolition of a single family dwelling and guest house, and construction of two dwelling units in conjunction with Preliminary Parcel Map AA-2014-1088-PMLA-SL within the single permit jurisdiction of the California Coastal Zone.

Case No. ZA 2014-1088(CDP)(ZAA)(MEL)

EXHIBIT # 4
PAGE 3 OF 10

Pursuant to California Governmental Code Sections 66590 and 66590.1 and the City of Los Angeles Mello Act Interim Ordinance, I hereby DETERMINE:

The proposed project qualifies for an exemption from the Mello Act. Furthermore, the Los Angeles Housing Department declared the project does not involve the demolition or conversion of affordable housing. Therefore, the applicant/owner/developer is not required to provide any inclusionary or replacement affordable dwelling units on-site or within the Coastal Zone;

upon the following additional terms and conditions:

1. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
2. The use and development of the property shall be in substantial conformance with the plot plan submitted with the application and marked Exhibit "A", except as may be revised as a result of this action.
3. The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective Conditions, if, in the Administrator's opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
4. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
5. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
6. The applicant shall defend, indemnify and hold harmless the City, its agents, officers, or employees from any claim, action or proceedings against the City or its agents, officers, or employees relating to or to attack, set aside, void or annul this approval which action is brought within the applicable limitation period. The City shall promptly notify the applicant of any claim, action, or proceeding and the City shall cooperate fully in the defense. If the City fails to promptly notify the applicant of any claim action or proceeding, or if the City fails to cooperate fully in the defense, the applicant shall not thereafter be responsible to defend, indemnify, or hold harmless the City.
7. The project shall comply with all conditions identified in Case Nos. AA-2014-1086-PMLA-SL and ENV-2014-1087-MND.

8. The project shall be in conformance with applicable provisions of the Venice Coastal Specific Plan (Ordinance No. 175,693). Prior to any sign-off by the Zoning Administrator, the applicant/owner shall obtain a clearance from the Plan Implementation Division, Community Planning Bureau regarding compliance with the provisions of the Venice Coastal Specific Plan. Said approval shall be in the form of a stamp on the building plans.
9. Prior to the issuance of any permits relative to this matter, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Zoning Administrator for attachment to the subject case file.

OBSERVANCE OF CONDITIONS - TIME LIMIT - LAPSE OF PRIVILEGES

All terms and conditions of the approval shall be fulfilled before the use may be established. The instant authorization is further conditional upon the privileges being utilized within three years after the effective date of approval and, if such privileges are not utilized or substantial physical construction work is not begun within said time and carried on diligently to completion, the authorization shall terminate and become void.

TRANSFERABILITY

This authorization runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent upon you to advise them regarding the conditions of this grant.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

Section 12.29 of the Los Angeles Municipal Code provides:

"A variance, conditional use, adjustment, public benefit or other quasi-judicial approval, or any conditional approval granted by the Director, pursuant to the authority of this chapter shall become effective upon utilization of any portion of the privilege, and the owner and applicant shall immediately comply with its Conditions. The violation of any valid Condition imposed by the Director, Zoning Administrator, Area Planning Commission, City Planning Commission or City Council in connection with the granting of any action taken pursuant to the authority of this chapter, shall constitute a violation of this chapter and shall be subject to the same penalties as any other violation of this Code."

Every violation of this determination is punishable as a misdemeanor and shall be punishable by a fine of not more than \$2,500 or by imprisonment in the county jail for a period of not more than six months, or by both such fine and imprisonment.

Case No. ZA 2014-1088(CDP)(ZAA)(MEL)

EXHIBIT # 4
PAGE 5 OF 10**APPEAL PERIOD - EFFECTIVE DATE**

The applicant's attention is called to the fact that this authorization is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any Condition of this grant is violated or not complied with, then this authorization shall be subject to revocation as provided in Section 12.27 of the Municipal Code. The Zoning Administrator's determination in this matter will become effective after August 3, 2015, unless an appeal therefrom is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of the Zoning Administrator's action, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. **Forms are available on-line at <http://cityplanning.lacity.org>.** Public offices are located at:

Figueroa Plaza
201 North Figueroa Street,
4th Floor
Los Angeles, CA 90012
(213) 482-7077

Marvin Braude San Fernando
Valley Constituent Service Center
6262 Van Nuys Boulevard, Room 251
Van Nuys, CA 91401
(818) 374-5050

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 12.20.2-J of the Los Angeles Municipal Code, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

Provided no appeal has been filed by the above-noted date, a copy of the permit will be sent to the California Coastal Commission. Unless an appeal is filed with the California Coastal Commission before 20 working days have expired from the date the City's determination is deemed received by such Commission, the City's action shall be deemed final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

NOTICE

The applicant is further advised that all subsequent contact with this Office regarding this determination must be with the Zoning Administrator who acted on the case. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting. You should advise any consultant representing you of this requirement as well.

FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the plans submitted therewith and the statements made at the public hearing on June 10, 2015, all of which are by reference made a part hereof, as well as knowledge of the property and surrounding district, I find that the requirements and prerequisites for granting a coastal development permit as enumerated in Section 12.20.2 of the Municipal Code have been established by the following facts:

BACKGROUND

The project site is a level, rectangular lot that is 40 feet wide and 130 feet deep. It sits on the southeast side of Brooks Avenue (a Local Street), between 7th Avenue (a Local Street) and 6th Avenue (a Local Street). A 10-foot wide alley (Brooks Court) is at the rear of the lot. The site is surrounded by single-family and multiple-family dwellings. They are zoned RD1.5-1 and have a General Plan Land Use Designation of Low Medium II. The zoning and land use designation are consistent.

The RD1.5-1 zoning on the site requires 1500 square feet of lot area per dwelling unit. The lot size, which is approximately 5201 net square feet, allows as many as 3 dwelling units. However, the project is for 2 dwelling units. The total number of parking spaces proposed is 5. As designed, the proposed project meets the requirements of the Small Lot Ordinance.

There is a single-family dwelling and a guest house on the property that would be demolished as part of the project. The site contains one tree that is 20-inches in diameter that will be removed from the property. It would need to be replaced by the applicant.

The property is located in a liquefaction area and in the Los Angeles Coastal Transportation Corridor. The site is also located in the Venice Coastal Zone, thus the Coastal Development Permit and Mello Clearance must be approved for this project to be developed.

MANDATED FINDINGS

In order for a coastal development permit to be granted all of the requisite findings maintained in Section 12.20.2 of the Los Angeles Municipal Code must be made in the affirmative. Following is a delineation of the findings and the application of the facts of this case to same.

1. **The development is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Chapter 3 of the Coastal Act contains the various policy provisions of such legislation. Pertinent to the instant request are the policies with respect to Development. The proposed project constitutes new development because it involves the construction of two new single-family dwellings.

Sections 30250, 30251 and 30252 of the California Coastal Act, provide in part and respectively that:

New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

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

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving development with public transportation .

The proposed project will not adversely affect the adjacent or surrounding properties because it is located in a residential district in an existing developed area able to accommodate such uses. The subject property and properties surrounding the site are zoned RD1.5-1 and are developed with multiple-family dwellings and single-family dwellings.

The project has no adverse effects on public access, recreation, public views or the marine environment. The project will not block physical or visual access to or along the coast or public coastal views. The project consists of the demolition of a single-family dwelling and guest house, and construction, use and maintenance of 2 dwelling units in conjunction with a Small Lot Parcel Map. The proposed use will neither interfere nor reduce access to the shoreline or beach access. No boating will occur adjacent to the site. There will be no dredging, filling or diking of coastal waters or wetlands associated with the request. There are no identified sensitive habitat areas, archaeological or paleontological resources on the file.

2. **The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

The Land Use element of the Venice Local Coastal Program (LCP) which is a part of the Venice Community Plan, was adopted in June, 2001.

The project is in compliance with the Venice Community Plan. The Venice Community Plan designates the property for Medium Residential density, consistent with the existing zone of RD1.5-1. The project must be in conformance with the Community Plan Designation and the Zone.

The project shall also be in conformance with applicable provisions of the Venice Coastal Zone Specific Plan (Ordinance No. 175,693). As a condition of approval (Condition #8) prior to any sign-off by the Zoning Administrator, the applicant/owner shall obtain a clearance from the Plan Implementation Division, Community Planning Bureau regarding compliance with the provisions of the Venice Coastal Specific Plan. Said approval shall be in the form of a stamp on the building plans.

The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination. Such Guidelines are designed to provide direction to decision-makers in rendering discretionary determinations on requests for coastal development permits pending adoption of an LCP. In this instance, the Guidelines standards concerning the following are relevant:

The Guidelines are designed to provide direction to decision-makers in rendering discretionary determinations on requests for coastal development permits pending adoption of an LCP. Because the proposed dwellings are consistent in scale and setback with the surrounding dwellings, and because the site is removed from any sensitive area as well as the shoreline, its construction poses no threat to the protection of coastal resources. Traffic associated with 2 dwelling units is low. The California Coastal Commission's interpretive guidelines have been reviewed and considered in preparation of these findings.

4. **The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.**

No outstanding issues have emerged which would indicate a conflict between this request and any other decision of the Coastal Commission. The subject project does not block physical or visual access to or along the coast. Therefore, the proposed development will not have any new adverse impact on public access to the coast or to nearby recreational facilities.

5. **The development is/is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

The property does not provide access to or from the beach as it is located on East Brooks Avenue at a distance of over 1000 feet from the beach. There is no evidence of any previous public ownership of the lot and the project does not conflict with the goal of providing appropriately located public access points to the coast.

6. **An appropriate environmental clearance under the California Environmental Quality Act has been granted.**

On August 11, 2014, a Mitigated Negative Declaration (ENV-2014-1087-MND) was issued for the proposed project. The Mitigated Negative Declaration and Initial Study Checklist were submitted to the State Clearinghouse and posted for a 30-day public review period. The California Resources Agency, California Coastal Commission, Department of Fish and Wildlife, Department of Parks and Recreation, Department of Water Resources, Caltrans, Air Resources Board, Regional Water Quality Control Board, and Public Utilities Commission did not submit any comments regarding the proposed project during that period.

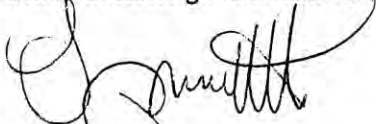
FINDINGS FOR MELLO ACT

7. The proposed project is subject to the Mello Act. In a letter dated March 4, 2014, Robert Manford, Environmental Affairs Officer for the Los Angeles Housing Department issued a letter stating that based on rental information provided by the owner, Brooks Development, LLC, a California Limited Liability Company, the Los Angeles Housing Department (LAHD) determined that no affordable units exist at 672-672½ East Brooks Avenue, Venice CA 90291.
8. The proposed project does not meet or exceed the threshold of ten or more new whole dwelling units to require the inclusion of affordable dwelling units. Therefore the applicant/owner/developer is not required to provide any inclusionary affordable dwelling units on-site or within the Coastal Zone.

ADDITIONAL MANDATORY FINDINGS

9. The subject property is not located in an area for which a flood insurance rate map has been prepared.
10. On August 11, 2014, a Mitigated Negative Declaration (ENV-2014-1087-MND) was issued for the proposed project. On the basis of the whole of the record before the lead agency including any comments received, the lead agency found on the original environmental document that with imposition of the mitigation measures described in the MND and adopted as part of the proposed project, there is no substantial evidence that the proposed project will have a significant effect on the environment. The Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis.

Inquiries regarding this matter shall be directed to Kevin Golden, Planning Staff for Office of Zoning Administration at (213) 978-1396.



LINN K. WYATT
Chief Zoning Administrator

LKW:KG:thb

cc: Councilmember Mike Bonin
Eleventh District
Adjoining Property Owners

COASTAL COMMISSION

EXHIBIT # 4
PAGE 10 OF 10