

**CALIFORNIA COASTAL COMMISSION**

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



# Th13a

Click here to go to  
original staff report

## ADDENDUM

October 28, 2016

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **APPEAL NO. A-5-VEN-16-0081 (657 E. FLOWER AVE.) FOR THE COMMISSION MEETING OF THURSDAY, NOVEMBER 3, 2016.**

---

## PUBLIC CORRESPONDENCE

Commission staff received one (1) letter supporting the project and a finding of no substantial issue from the representatives of Kobe Marciano, the project applicant.

Commission staff received one (1) letter opposing the project and a finding of no substantial issue from the appellants, Robin Rudisill, Sue Kaplan and Lydia Ponce. The letter indicates that the mass, scale and character of the proposed project should be reviewed and therefore should be required to obtain a coastal development permit. The letter also cites several passages of a Commission staff report dated April 21, 2016 for a claim of exemption project on the same property, 657 E. Flower Avenue, that the staff was recommending Substantial Issue on.

Staff Response: As detailed in the staff report, the proposed project does qualify for an exemption under Coastal Act Section 30610(a). Coastal Act Section 30610(a) allows *improvements* to existing single-family residences without a coastal development permit. Improvements to buildings typically include additions. The Coastal Act does not put a limit on the size of an addition to an existing structure, with limited exceptions (depending on certain geographical features) of the site, as long as 50 percent of the existing structure is not removed, replaced, or demolished. In regard to the concerns raised by the appellants regarding the size, scale, massing, of the development and whether the new addition to the existing house would be consistent with the character of the community; staff would note that although these issues are not relevant in regard to whether the project would, or would not, be considered exempt from the requirement to obtain a coastal permit relative to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the Public Resources Code, they will be important and relevant in the event that the Commission denies the exemption as a de novo action.

As for the excerpts from the Commission staff report on Appeal No. A-5-VEN-16-0024 dated April 21, 2016, for a claim of exemption on the same property where the staff was

recommending a finding of Substantial Issue, staff would note that the applicant withdrew their claim of exemption (DIR 2015-3961-CEX) on May 10, 2016 prior to the Commission hearing and the City of Los Angeles, Department of City Planning, confirmed with Commission staff that the claim of exemption was voided (see pages 4-5 of the current staff report, dated October 13, 2016 for history of project claim of exemptions). In response to the claim of exemption appeals, the applicant has modified the project to be considered exempt from the requirement to obtain a coastal permit relative to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the Public Resources Code.

LAW OFFICE OF  
STEVE KAPLAN

16133 VENTURA BOULEVARD, SUITE 700  
ENCINO, CALIFORNIA 91436

TELEPHONE: (818) 377-7440

EMAIL: SK.LANDUSELAW@GMAIL.COM

October 26, 2016

California Coastal Commission  
c/o South Coast District Office  
200 Oceangate, 10<sup>th</sup> Floor  
Long Beach, CA 90802

**RECEIVED**  
South Coast Region

OCT 26 2016

CALIFORNIA  
COASTAL COMMISSION

Agenda Item: Thr13a

RE: Appeal Number: A-5-VEN-16-0081  
Local Decision: L.A. Case No. DIR-2016-2804-CEX  
Project Location: 657 E. Flower Avenue, Venice, City of Los Angeles

Members of the California Coastal Commission:

This letter is submitted on behalf of the owners and applicant of the above captioned project ("Project") site (1) in response and opposition to the appeal filed in the above referenced matter and (2) in support of the California Coastal Commission (Commission) Staff Report ("Staff Report") prepared for the subject substantial issue hearing and its analysis of the propriety of the action taken by the City of Los Angeles in issuing the subject Local Coastal Exemption ("CEX") for the remodeling improvement to the subject existing residential structure.

1. The Staff Report summarizes and concludes its recommendation to the Commission and states, in pertinent part, that...

- "...no substantial issue exists with respect to the grounds on which Appeal A-5-VEN-16-0081 has been filed because the locally approved development does qualify for an exemption and does not require a local coastal development permit from the City of Los Angeles."
- "...The City-approved development constitutes an "improvement" to an existing development because less than 50% of the existing single family residence will be demolished."
- "...Therefore, the proposed project is an exempt "development" as defined by the Coastal Act and does not require a coastal development permit because less than 50 percent of the existing single-family residence is proposed to be removed."

The Staff Report also details the permit history of the of the subject site in the attempts made by the owner and applicant to remodel the subject property. The undersigned and the applicant met twice with both the LA City Planning staff and the staff of the South Coast District Office of the Commission in order to work out a workable plan to remodel the subject site that did not contemplate demolishing more than 50% of the existing structure. Many hours were spent by both staffs and the owner in finding a solution to remodel the site within Coastal Act guidelines.

It is important for the Commission to note that as reviewed in the Staff Report, the subject work of improvement, pursuant to Coastal Act Section 30610, does not need a coastal development permit because it is an improvement to an existing single-family residence wherein no more than 50% of the improvement is being demolished and, as stated on the City-approved plans for the Project, "this modification will not exceed 20% of the total square footage of the existing surfaces."

2. The Appellants contentions contained in the filed appeal are without merit for the following reasons:

- The appeal contends, without documentation or support, that more than 50% of the structure will be demolished notwithstanding the verified calculations and review made by both LA City Planning and Coastal Commission staffs. Appellants' state that ..." Even if the plans do not indicate replacement of floors and walls, the "City building inspector *may require* (emphasis added) replacement of these components..." Review of Appellants' contentions cannot be based upon speculation when local and state oversight has verified that no more than 50% of the existing structure is being demolished and permits were issued upon that basis.

- The appeal contends that the mass and scale of the locally-exempted Project is inconsistent with the community character of the area and therefore inconsistent with the Venice certified Land Use Plan and Chapter 3 policies of the Coastal Act. As the Staff Report states in pertinent part... "Because the proposed development is exempt from coastal development permit requirements, there is no need for the Commission to review the appellants' concerns regarding the project's consistency with Chapter 3 policies of the Coastal Act, including its consistency with policies protecting the character of the community."

It should also be noted, and as stated in the Staff Report..."the Coastal Act does not put a limit on the size of an addition to an existing structure...as long as 50 percent of the existing structure is not removed, replaced, or demolished."

For the reasons stated above, the undersigned respectfully requests that the Commission find that no substantial coastal issue exists in this matter and deny the subject appeal.

Sincerely,

Steve Kaplan

October 27, 2016

# Th13a

Coastal Staff & Coastal Commissioners  
200 Oceangate, 10<sup>th</sup> Floor  
Long Beach, CA 90802

Re. APPEAL of Coastal Exemption for:  
657 Flower Ave (A-5-VEN-16-0081)  
Hearing date: Thursday November 3, 2016  
Agenda Item Th13a

Dear Coastal Staff and Honorable Commissioners,

Set forth below are two excerpts from the Coastal Commission-Certified Venice Land Use Plan. This document has been certified to be consistent with Chapter 3 of the Coastal Act.

**Special Coastal Community:** An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the

Venice Local Coastal Program

I-16

visual attractiveness of the coast.

**Preservation of Venice  
as a Special Coastal  
Community**

**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 of 1976.

**Policy I. E. 2. Scale.** New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk,

Venice Local Coastal Program

II-26

height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect

Venice has been designated by the Coastal Commission as a Special Coastal Community. As such, as indicated in Certified Venice Land Use Plan Policy I. E. 2. Scale, "All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods." There is no way to monitor mass, scale and character if the project is processed with a Coastal Exemption (CEX), thus allowing large additions to be approved with a Coastal Exemption will cause an unacceptable cumulative impact and will result in the loss of Venice's designation as a Special Coastal Community as it will not be possible to assure that "All new development AND RENOVATIONS should respect the scale, massing, and landscape of existing neighborhoods."

**On April 21, 2016, Coastal Staff issued a Staff Report for this property for a different CEX. The Staff Report recommended a Substantial Issue decision based on factors for “Significance of Coastal Resources” and “Precedential Value of the Local Government’s Decision” as well as whether the appeal raises issues of statewide significance:**

The third factor is the significance of the coastal resources affected by the decision. The coastal resource that is affected by the locally approved project is community character, which is significant in Venice. Other coastal resources could be affected. The City’s coastal exemption process was utilized instead of the coastal development permit process, during which the proposed development would be reviewed for consistency with the character of the surrounding area. Community character issues are particularly important in Venice. Although this exemption related to only one project, the erosion of community character is a cumulative issue, and the City’s cumulative exemption of numerous large-scale remodel and demolition projects has a

10

---

A-5-VEN-16-0024 (Jun)  
Appeal – Substantial Issue and De Novo

significant impact on Venice’s visual character. See, e.g., staff reports dated 1/28/16 and 3/24/16 for Appeal No. A-5-VEN-16-0005.

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. Issuing exemptions for proposed projects like these that result in the construction of new larger residences circumvents the coastal development permit process and its requirement for public participation, and sets a bad precedent. As discussed above, significant adverse impacts to coastal resources would potentially occur, if the City’s coastal exemption process is inappropriately used to avoid the coastal development permit process, during which the proposed development would be reviewed for consistency with the character of the surrounding area and would potentially set a bad precedent. The abuse of the City’s coastal exemption process in order to avoid obtaining a coastal development permit for new development is a recurring problem. [See California Coastal Commission meeting agenda for 4/14/16.]

The final factor is whether the appeal raises local issues, or those of regional or statewide significance. Although this appeal raises specific local issues, potentially exempting projects from the coastal development process that are not exempt pursuant to policies of the provisions of the Coastal Act will have potential negative and cumulative impacts to the coast if other local governments in the coastal zone apply their exemption authority in a similar manner. New structures must be properly reviewed through the local coastal development permit process and monitored by the City in order to protect coastal resources. Therefore, the City’s approval does raise potential issues of statewide significance.

On October 13, 2016, approximately six months later, a Staff Report for the same property, different CEX, states:

The third factor is the significance of the coastal resources affected by the decision. However, this factor is directly tied to the Chapter 3 policies of the Coastal Act, which, as stated in previous sections, are not relevant when considering appeals of coastal exemptions. Rather, in the case of appeals of coastal exemptions, the Commission must determine if there is factual and legal support for the local government's decision that the development can be authorized without a coastal development permit pursuant to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations. If the Commission determines that the City erred in their review of the coastal exemption and a coastal development permit is required, the project will be subject to review with consistency with Chapter 3 policies (and/or any relevant local coastal plan policies).

13

---

A-5-VEN-16-0081 (Marciano)  
Appeal – No Substantial Issue

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 proposed development is consistent with Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations for coastal exemption projects. This project, as proposed, will not prejudice the ability of the City to prepare a Local Coastal Program that is in conformity with Chapter 3 of the Coastal Act.

The final factor is whether the appeal raises local issues, or those of regional or statewide significance. Exempting projects from the coastal development permitting process could have negative, cumulative impacts to the coast if the City and other local governments in the coastal zone apply their exemption authority in an improper manner. However, the City properly reviewed this project prior to issuing a coastal exemption and properly applied the relevant exemptions. Therefore, even though the City properly utilized an exemption in this case, the City's approval does raise potential issues of statewide significance because the interpretation and application of Coastal Act exemptions is of statewide importance.

We strongly agree with the April 2016 assessment. There were several similar Staff Reports approved by the Commission with respect to Coastal

Exemptions in April 2016, and thus a precedent was set. The second, October 2016 assessment is erroneous and should be updated to reflect the findings and conclusions approved by the Coastal Commissioners at the April 2016 meeting.

It should also be noted that sometime after the Commission stopped doing De Minimis Waivers for Venice, the City of L.A. Planning Department tells us that Coastal Staff encouraged them to broaden the limits for what may qualify as a Coastal Exemption, including for additions. Prior to that the City of L.A. limited approval of additions. This was inappropriate of Coastal Staff to recommend this change as there was no basis for it and it seems to have been done mainly to appease developers who were upset about the De Minimis Waivers stopping. We will provide Coastal Staff details of that change in procedure. We will also provide Coastal Staff our summary of issues with their mass, scale and character compatibility analysis to the surrounding existing neighborhood, which we believe is misleading. We will provide what we believe is a more accurate and meaningful assessment

Thank you for your consideration and we hope that you will see fit to honor our request and grant our appeal of this development.

Sincerely yours,

Robin Rudisill  
Sue Kaplan  
Lydia Ponce

**CALIFORNIA COASTAL COMMISSION**

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

**Th13a**

Filed: 9/6/2016  
49th Day: Waived  
Staff: C. Oshida – LB  
Staff Report: 10/13/2016  
Hearing Date: 11/3/2016

**STAFF REPORT: APPEAL – NO SUBSTANTIAL ISSUE**

**Local Government:** City of Los Angeles

**Local Decision:** Claim of Exemption to Coastal Development Permit Requirement

**Appeal Number:** A-5-VEN-16-0081

**Applicant:** Kobe Marciano

**Agent:** Steve Kaplan

**Appellants:** Robin Rudisill, Lydia Ponce, and Sue Kaplan

**Project Location:** 657 E. Flower Avenue, Venice, City of Los Angeles

**Project Description:** Appeal of City of Los Angeles Local Coastal Exemption No. DIR-2016-2804-CEX for a 3,270.5 sq. ft. addition and 483 sq. ft. attached garage to a 1,395 sq. ft., 1-story single-family dwelling. The foundation, framing and front façade of the existing structure will remain as is. The interior layout will be modified but the perimeter walls will not.

**Staff Recommendation:** No Substantial Issue

**IMPORTANT NOTE:** This is a substantial issue only hearing. Testimony will be taken only on the question of whether the appeal raises a substantial issue. Generally and at the discretion of the Chair, testimony is limited to 3 minutes total per side. Please plan your testimony accordingly. Only the applicant, persons who opposed the application before the local government (or their representatives), or those who, for good cause, were unable to oppose the application before the local government, and the local government shall be qualified to testify. Others may submit comments in writing. If the Commission determines that the appeal does raise a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

**SUMMARY OF STAFF RECOMMENDATION**

The staff recommends that the Commission determine that **no substantial issue exists** with respect to the grounds on which Appeal A-5-VEN-16-0081 has been filed because the locally approved development does qualify for an exemption and does not require a local coastal development permit from the City of Los Angeles. The City-approved development constitutes an “improvement” to an existing development, because less than 50 percent of the existing single-family residence will be demolished. The scope of work

includes construction of a two-story, 3,270.5 square foot addition to the rear of the existing single-family residence, while the foundation, framing and front façade of the existing structure will remain as is with a few aesthetic modifications. Also, the interior layout of the existing house will be modified but the exterior walls, as well as the roof lines, will remain as is, except for the rear portion of the existing structure which will be slightly modified to accommodate for the necessary connections between the existing and new structures (**Exhibit 4**). Overall, City-approved plans indicate that more than 50 percent of the existing structure will be retained. Therefore, the proposed project is exempt “development” as defined in the Coastal Act and does not require a coastal development permit because less than 50 percent of the existing single-family residence is proposed to be removed. Commission Staff recommends that the Commission find that no substantial issue exists with respect to the grounds upon which the appeal has been filed because the City properly found that the proposed project does not require a local coastal development permit. The motion to carry out the staff recommendation is on **page 4**.

TABLE OF CONTENTS

I. MOTION AND RESOLUTION ..... 4

II. APPELLANTS’ CONTENTIONS..... 4

III. LOCAL GOVERNMENT ACTION ..... 4

IV. APPEAL PROCEDURES ..... 5

V. SINGLE/DUAL PERMIT JURISDICTION AREAS ..... 7

VI. FINDINGS AND DECLARATIONS ..... 7

    A. PROJECT LOCATION & DESCRIPTION ..... 7

    B. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS..... 8

    C. SUBSTANTIAL ISSUE ANALYSIS ..... 9

EXHIBITS

- Exhibit 1 – Vicinity Map
- Exhibit 2 – Photo of Site
- Exhibit 3 – Commission Notification of Appeal and Appeal
- Exhibit 4 – Architectural Plans

## I. MOTION AND RESOLUTION

**MOTION:** *I move that the Commission determine that Appeal No. A-5-VEN-16-0081 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 **YES** vote. Passage of this motion will result in a finding of No Substantial Issue and adoption of the following resolution and findings. If the Commission finds No Substantial Issue, the Commission will not hear the application de novo 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-16-0081 presents NO **SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under § 30602 of the Coastal Act regarding consistency with Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations, and therefore Chapter 3 of the Coastal Act.*

## II. APPELLANTS' CONTENTIONS

On September 3, 2016, the Commission received an appeal of Local Coastal Exemption DIR-2016-2804-CEX from Robin Rudisill, Lydia Ponce, and Sue Kaplan (**Exhibit 3**). The City's Coastal Exemption approved the following: "Add 3,270.5 sq. ft. & new 483 sq. ft. garage to existing 1,395 sq. ft. 1-story house. The foundation, framing & front façade of existing structure will remain as is. The interior layout will be modified but the perimeter walls not." The appeal contends that more than 50 percent of the structure will be demolished resulting in a new residential structure, and that the mass and scale of the locally-exempted project is inconsistent with the community character of the area and therefore is inconsistent with the Venice certified Land Use Plan (LUP) and the Chapter 3 policies of the Coastal Act. For the reasons stated above, the appeal contends that the City-approved project does not qualify for an exemption and requires the review afforded through the coastal development permit process.

## III. LOCAL GOVERNMENT ACTION

On October 29, 2015, the City of Los Angeles, Department of City Planning issued a Coastal Exemption (DIR 2015-3961-CEX) for a "2-story addition with new attached 2-car garage to existing one-story, single-family dwelling; major alterations to existing single-family dwelling; 55% of existing wall to remain. Existing single-family dwelling = 936 sq. ft. Total addition = 5,503 sq. ft. And demo garage 10'x12'; demo by handwreck, sewer cap is not required." On October 28, 2015, the City of Los Angeles, Department of City Planning issued a Director of Planning Sign-Off (DIR-2015-3655-VSO) for "remodel and addition to an existing one-story single family dwelling and demolition of a detached garage. Project will result in a 2,766 SF second story, a roof deck, two RASs, and an attached two car garage. Project will remove/alter 45% of the existing exterior walls."

The City forwarded a copy of the Coastal Exemption to the Coastal Commission's South Coast District Office on February 1, 2016. On March 1, 2016, the claim of exemption was appealed to the Commission's South Coast District Office (A-5-VEN-16-0024). On March 18, 2016, the applicant waived the 49-day rule for hearing an appeal. On May 10, 2016, the applicant withdrew their claim of exemption (DIR-2015-3961-CEX), that was the subject of appeal A-5-VEN-16-0024. On May 23, 2016, the applicant and agent met with Commission staff to clarify what types of development qualified for a Coastal Exemption and potential options as they moved forward with the proposed project.

On July 6, 2016, the City Department of Building and Safety issued Building Permit No. 16014-20000-02860 for an "addition to (E) one story SFD, (N) second story & (N) att. 2 car garage. All work per engineering," prior to receiving a coastal exemption or coastal developments permit. However, no work has commenced at the project site. On August 3, 2016, the City of Los Angeles, Department of City Planning issued a Coastal Exemption (DIR 2016-2804-CEX) **(Exhibit 3)** for a project that would *"Add 3,270.5 sq. ft. & new 483 sq. ft. garage to existing 1,395 sq. ft. 1-story house. The foundation, framing & front façade of existing structure will remain as is. The interior layout will be modified but the perimeter walls not."* The applicant name listed on the City's exemption is Kobe Marciano. The box checked on the City's exemption form is "Improvements to Existing Single-Family Residences."

The City forwarded a copy of the Coastal Exemption to the Coastal Commission's South Coast District Office on August 8, 2016, and, at that time, Coastal Commission staff established the 20 working-day appeal period for the local CDP action. On August 31, 2016, the City Department of Building and Safety issued Building Permit No. 16016-20000-19974 for a building alteration/repair for the replacement drywall, insulation, and roof re-sheathing. On September 6, 2016, the appellants submitted the appeal to the Commission's South Coast District Office. The appeal of the City's action was determined to be valid because it was received prior to the expiration of the twenty working-day period in which any action by the City of Los Angeles can be appealed to the Commission. On September 7, 2016, a Notification of Appeal was sent to the Los Angeles Department of City Planning and the applicant, notifying each party of the appeal of DIR-2016-2804-CEX, and the decision was stayed pending Commission action on the appeal. On September 21, 2016, the applicant waived the 49-day rule for hearing an appeal.

#### 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, and Section 30625 makes clear that claims of exemption are among the appealable actions.

After a final local action on a local coastal development permit application or a coastal exemption, the Coastal Commission must be noticed within five days of the decision. After

receipt of a notice that 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 stating the specific grounds for appeal and summarizing 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 approved project’s conformity with Chapter 3 of the Coastal Act. However, the Chapter 3 policies of the Coastal Act do not apply if the project is exempt from permitting requirements pursuant to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations. Accordingly, for appeals of coastal exemption determinations such as this, the Commission’s role is to determine whether there is factual and legal support for the local government’s exemption determination. If there is no substantial issue with regard to the propriety of the exemption determination, then there is also no substantial issue with regard to Chapter 3 conformity because those policies do not apply to exempt development. If the Commission decides that there is no substantial issue with the exemption determination—and thus Chapter 3—the action of the local government becomes final.

If, however, the Commission finds that a substantial issue exists with respect to the locally-approved project’s conformity with Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations, then the local coastal development permit decision is voided and the Commission typically continues the public hearing to a later date in order to review the claim of exemption as a *de novo* matter. [Cal. Pub. Res. Code §§ 30621 and 30625.] The standard of review for the *de novo* portion of an appeal is the same as described above—consistency with Chapter 3, as determined by analyzing consistency with Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations. Should the Commission deny the claim of exemption and determine that a coastal development permit is required, then the Chapter 3 policies of the Coastal Act are the standard of review if the applicant applies for, and the local jurisdiction considers, the permit. [Cal. Pub. Res. Code § 30625.]

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. 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 Regulations, 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), or those who, for good cause, were unable to oppose the application before the local government, 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. SINGLE/DUAL PERMIT JURISDICTION AREAS**

Section 30601 of the Coastal Act provides details regarding the geographic areas where applicants must also obtain a coastal development permit from the Commission in addition to obtaining a local coastal development permit from the City. These areas are considered Dual Permit Jurisdiction areas. Coastal zone areas outside of the Dual Permit Jurisdiction areas are considered Single Permit Jurisdiction areas. Pursuant to Section 30600(b) of the Coastal Act, the City of Los Angeles has been granted the authority to approve or deny coastal development permits in both jurisdictions, but all of the City's actions are appealable to the Commission. The proposed project site is located within the Single Permit Jurisdiction Area.

## **VI. FINDINGS AND DECLARATIONS**

### **A. PROJECT DESCRIPTION & LOCATION**

The Los Angeles County Tax Assessor records indicate that the existing one-story 936 square foot home at 657 E. Flower Avenue was constructed in 1922, and Los Angeles Building and Safety records indicate that an approximately 378 square foot, one-story addition was added to the rear of the existing house in 1955 (per City of Los Angeles Building and Safety Permit No. 1955-12762; pre-Coastal Act). The scope of work provided by the applicant on the City's Coastal Exemption form is *"Add 3,270.5 sq. ft. & new 483 sq. ft. garage to existing 1,395 sq. ft. 1-story house. The foundation, framing & front façade of existing structure will remain as is. The interior layout will be modified but the perimeter walls not."*

The City of Los Angeles did retain copies of plans for this project when it was deemed exempt from permit requirements, and submitted the project plans along with the coastal exemption to the Commission's South Coast Office on August 8, 2016 (**Exhibit 4**). According to the plans submitted by the City, the scope of work includes: (1) the construction of a two-story (maximum height of 30 feet), 3,270.5 square foot addition to the rear of the existing single-family residence; (2) "the foundation, framing and front façade of the existing structure will remain as is"; and (3) the interior layout of the existing house will be modified but the exterior walls as well as the roof lines will remain as is, except for the rear portion of the existing structure which will be slightly modified to accommodate for the necessary connections between the existing and new structures (**Exhibit 4**). However, the scope of work on the City-approved plans, adds that "this modification will not exceed 20% of the total square footage of the existing surfaces" (**Exhibit 4**). The new second-floor addition will cover the new first-floor footprint and only extend approximately 16 feet over the existing structure (portion of the 1955 addition). New foundational elements and load bearing walls are proposed on portions of the lot where none exist currently, while the existing foundation and perimeter walls will remain intact. Two on-site parking spaces will be maintained on-site in a new attached garage.

The plans also state that the roofing material (i.e. shingles) and siding material will be replaced so that the proposed addition and the existing structure match aesthetically. However, the applicant maintains that all underlying material, such as studs, framing, and most of the drywall, will not be

removed during this process. In addition, additional structural support (beams) that may be added when the existing interior walls are removed will not result in the demolition of any of the existing structural elements (except some drywall). Flooring in the existing 1955 addition area that is lower than the original finished flooring will be cosmetically raised to level it, using a technique that will not damage or remove the existing foundation.

The project site is located in the Oakwood subarea at 657 E. Flower Avenue within the City of Los Angeles Single Permit Jurisdiction Area, about 0.7-mile inland of the beach (**Exhibit 1** and **Exhibit 2**). The lot area is 5,800 square feet and is designated as for multi-family residential use according to the Venice certified LUP. The Oakwood neighborhood is comprised of an amalgam of new and old one-to-two story buildings with a maximum height of 25 feet for flat roofs and 30 feet for varied rooflines; roof access structures are typically permitted to extend 10 feet above the flat roof height limit. Within the 600 block of E. Flower Avenue, the residential buildings range in size from 198 sq. ft. (653 E. Flower Avenue) to 6,596 sq. ft. (676 E. Flower Avenue), and the average residential building size is 2,268 square feet. In addition, these buildings range in number of residential units from single-family to nine (9) units on a single lot (676 E. Flower Avenue).

## **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. As described above, in the case of appeals of coastal exemptions (Section 30625(a) of the Coastal Act), this standard requires the Commission to determine if there is factual and legal support for the local government's decision that the development can be authorized without a coastal development permit pursuant to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations.

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 **no substantial issue exists** with respect to whether the local government action conforms to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations for the reasons set forth below.

### C. SUBSTANTIAL ISSUE ANALYSIS

The grounds for this appeal are that the project is not an improvement to an existing structure and is therefore non-exempt “development” as defined in the Coastal Act. The appellants claim that a coastal development permit should therefore have been required.

Section 30600(a) of the Coastal Act requires that anyone wishing to perform or undertake any development within the coastal zone shall obtain a coastal development permit. Development is broadly defined by Section 30106 of the Coastal Act, which states:

*“Development” means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z’berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).*

Construction, reconstruction, demolition, or alteration of the size of any structure in the coastal zone is development that requires a coastal development permit, unless the development qualifies as development that is authorized without a coastal development permit.

Coastal Act Section 30610 Developments authorized without permit, states:

*Notwithstanding any other provision of this division, **no coastal development permit shall be required** pursuant to this chapter for the following types of development and in the following areas:*

*(a) **Improvements to existing single-family residences**; provided, however, that the commission shall specify, by regulation, those classes of development which involve a risk of adverse environmental effect and shall require that a coastal development permit be obtained pursuant to this chapter....*

*(d) Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities; provided, however, that if the commission determines that certain extraordinary methods of repair and maintenance involve a risk of substantial adverse environmental impact, it shall, by regulation, require that a permit be obtained pursuant to this chapter.*

Section 13250 Improvements to Existing Single-Family Residences, states:

*(a) For purposes of Public Resources Code Section 30610(a) where there is an existing single-family residential building, the following shall be considered a part of that structure:*

*(1) All fixtures and other structures directly attached to a residence;*

*(2) Structures on the property normally associated with a single-family residence, such as garages, swimming pools, fences, and storage sheds; but not including guest houses or self-contained residential units; and*

*(3) Landscaping on the lot.*

Additionally, the Commission typically requires fifty percent of the structure to be maintained in order to qualify as ***an existing structure***.

Section 13252 Repair and Maintenance Activities That Require a Permit, states:

*(b) Unless destroyed by natural disaster, **the replacement of 50 percent or more of a single family residence, seawall, revetment, bluff retaining wall, breakwater, groin or any other structure is not repair and maintenance under Section 30610(d) but instead constitutes a replacement structure requiring a coastal development permit.***

The grounds for this appeal are that the project is not exempt development as defined in the Coastal Act and, as such, the applicant must obtain a coastal development permit for the proposed development. The description and proposed plans of the project, which includes the interior remodel and addition to the existing single-family residence resulting in less than 50 percent demolition of the existing exterior structural elements of the structure, is considered an improvement to an existing structure, and is not a new residential structure, based on the applicable provisions of the Coastal Act.

Additionally, the City of Los Angeles Certified Land Use Plan (LUP) for Venice defines “remodel” as: an improvement to an existing structure in which no more than fifty percent (50%) of the exterior walls are removed or replaced. In past actions, the Commission found that when a “remaining wall” is used as a measure to determine whether a development is a remodel or a new structure, the wall must remain intact as part of the structure, and for purposes of calculating the fifty-percent guideline should retain its siding, framing (studs), drywall/plaster, windows, and doorways. Furthermore, the Commission found that demolition, reconstruction, or substantial redevelopment of a project in the Venice coastal zone are not exempt under any section or provision of the Coastal Act, or the Commission’s Regulations and require a coastal development permit. In some cases, even if a development is a remodel under the LUP, it does not mean that it is exempt from the coastal development permitting requirements. The LUP sets forth no policies relative to interpreting remodels as being exempt development. As such, an exemption determination is based on a reading of applicable Coastal Act provisions and associated implementing regulations in the Commission’s regulations. In this case, the amount of existing structure proposed to be removed does not exceed 50 percent. Therefore, a coastal development permit is not required.

In determining whether the project constitutes the replacement of 50 percent or more of the existing structure, Commission staff analyzes what percentage of which components and how

much of each component of the house is being replaced. A single family residence consists of many components that can be measured, such as: the foundation, plumbing, electrical, walls, floor, and/or roof of the structure. The project plans must indicate the amount of demolition and augmentation that is necessary to build the proposed remodel. If 50 percent or more of the total of these components are being replaced, then the project would not qualify as exempt development, and must obtain a coastal development permit pursuant to Section 30600(a) of the Coastal Act. Typically, the addition of a complete second story above a one-story structure would not qualify for an exemption because the amount of construction required to support the additional weight of a new level would often require reinforcement of the first-floor load bearing walls, often with steel framing, and/or a new foundation which would exceed the amount of change allowable under an exemption. However, the project description and plans show that the second floor of the addition will primarily be located above the proposed first-floor addition at the rear of the structure; and only extend about 16 feet above the existing structure. This approximately 350 square foot area that is proposed to extend over the existing residence is located above the 1955 addition of the existing structure, and contains slightly newer building material than the original house which dates to 1922. The applicant is proposing the replacement of most of the material in this area and has accounted for that on the City-approved project demolition plans.

The proposed project does qualify for an exemption under Coastal Act Section 30610(a). Coastal Act Section 30610(a) allows *improvements* to existing single-family residences without a coastal development permit. Improvements to buildings typically include additions. The Coastal Act does not put a limit on the size of an addition to an existing structure, with limited exceptions (depending on certain geographical features) of the site, as long as 50 percent of the existing structure is not removed, replaced, or demolished.

In this case, the amount of the existing structure proposed to be removed is less than 50 percent and therefore can be considered an improvement to an existing single-family residence that is exempt from coastal development permit requirements. According to the plans (**Exhibit 4**), the scope of work includes: (1) the construction of a two-story (maximum height of 30 feet), 3,270.5 square foot addition to the rear of the existing single-family residence; (2) “the foundation, framing and front façade of the existing structure will remain as is”; and (3) the interior layout of the existing house will be modified but the exterior walls as well as the roof lines will remain as is, except for the rear portion of the existing structure which will be slightly modified to accommodate for the necessary connections between the existing and new structures (**Exhibit 4**). However, the scope of work on the City-approved plans, adds that “this modification will not exceed 20% of the total square footage of the existing surfaces” (**Exhibit 4**). New foundational elements and load bearing walls are proposed on portions of the lot where none exist currently, however, the existing foundation and exterior walls will remain.

While the roofing material (i.e. shingles) and siding material will be replaced so that the proposed addition and the existing structure match aesthetically, the applicant maintains that all underlying material, such as studs, framing, and most of the drywall, will not be removed during this process. In addition, any additional structural support (beams) that may be added when the existing interior walls are removed will not result in the demolition of any of the existing structural elements (except some drywall). Areas in the existing house where the floors are lower than the original finished flooring will be cosmetically raised to level it, using a technique that will not damage or remove the existing foundation.

Coastal Act Section 30600 Coastal Development Permit; Procedures Prior to Certification of Local Coastal Program, states:

- (a) Except as provided in subdivision (e), and in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person as defined in Section 21066, wishing to perform or undertake any development in the coastal zone, other than a facility subject to Section 25500, shall obtain a coastal development permit.*
- (b) (1) Prior to certification of its local coastal program, a local government may, with respect to any 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. Those procedures may be incorporated and made a part of the procedures relating to any other appropriate land use development permit issued by the local government.*  
*(2) A coastal development permit from a local government shall not be required by this subdivision for any development on tidelands, submerged lands, or on public trust lands, whether filled or unfilled, or for any development by a public agency for which a local government permit is not otherwise required.*
- (c) If prior to certification of its local coastal program, a local government does not exercise the option provided in subdivision (b), or a development is not subject to the requirements of subdivision (b), a coastal development permit shall be obtained from the commission or from a local government as provided in subdivision (d).*
- (d) After certification of its local coastal program or pursuant to the provisions of Section 30600.5, a coastal development permit shall be obtained from the local government as provided for in Section 30519 or Section 30600.5.*

The City of Los Angeles has the authority to issue coastal development permits, as well as coastal exemptions. The proposed project site is located within the *Single Permit Jurisdiction Area*. For the reasons discussed in detail above, the proposed project constitutes an improvement to an existing one-story approximately 1,395 square foot structure and construction of a new 3,270.5 square foot, two-story addition with attached, 483 square foot garage, resulting in the removal of less than 50 percent of the existing material, which is exempt under the Coastal Act and the Commission's Regulations. Therefore, the proposed project does not require a local coastal development permit from the City of Los Angeles.

Because the proposed development is exempt from coastal development permit requirements, there is no need for the Commission to review the appellants' concerns regarding the project's consistency with Chapter 3 policies of the Coastal Act, including its consistency with policies protecting the character of the community. These issues would, however, be important and relevant in a situation where the Commission found that an exemption determination raises a substantial issue and denies the exemption in a de novo action. In such cases, the local jurisdiction will have to review a project's consistency with Chapter 3 policies (and/or any relevant local coastal plan policies) if the applicant applies for a coastal development permit. Although Chapter policies are not relevant to the Commission's substantial issue determination, Commission staff did consider the scale and massing of the proposed project in comparison to surrounding residential structures and found that it is not out of character with the surrounding

area and community (see section “A. Project Description & Location” on page 8 under Findings and Declarations).

Substantial Issue Factors:

Applying the five factors listed in the prior section clarifies that the appeal raises “no substantial issue”, and therefore, does meet the substantiality standard of Section 30625(a).

The first factor is the degree of factual and legal support for the local government’s decision that the development is exempt from CDP requirements. The City used detailed plans in its determination to issue a coastal exemption for a project with the scope of work. According to the plans approved by the City, the scope of work includes the construction of a two-story, 3,270.5 square foot addition to the rear of the existing single-family residence with an interior remodel. The scope of work and accompanying demolition plans also show less than 50 percent of the existing house being demolished, removed, or modified. Therefore, the proposed development is considered an “improvement” to an existing residential unit. Any deviation from the approved scope of work and approved plans may void the City-issued coastal exemption and require a coastal development permit.

The locally approved development would not result in more than 50 percent demolition of the existing structure and is an improvement to an existing structure, which qualifies for a coastal development permit exemption under section 30610 of the Coastal Act and the Commission’s regulations, as noted above. Additionally, City staff did retain copies of the plans for the proposed development and provided them to Commission staff to review in order to determine whether the City properly determined that the proposed development was exempt. Therefore, the Coastal Commission finds that the City does have an adequate degree of factual or legal support for its exemption determination.

The second factor is the extent and scope of the development as approved or denied by the local government. The extent and scope of the locally approved development is clear because there are City-approved plans available to determine the scope (**Exhibit 4**). Based on the project description and plans, the City was able to determine that less than 50 percent of the existing single-family residence would be removed during this project, which does not exceed the limitation to be eligible for a coastal exemption. Therefore, the full extent and scope of the City-approved project was reviewed by the City and determined to qualify for a coastal exemption.

The third factor is the significance of the coastal resources affected by the decision. However, this factor is directly tied to the Chapter 3 policies of the Coastal Act, which, as stated in previous sections, are not relevant when considering appeals of coastal exemptions. Rather, in the case of appeals of coastal exemptions, the Commission must determine if there is factual and legal support for the local government’s decision that the development can be authorized without a coastal development permit pursuant to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations. If the Commission determines that the City erred in their review of the coastal exemption and a coastal development permit is required, the project will be subject to review with consistency with Chapter 3 policies (and/or any relevant local coastal plan policies).

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 proposed development is consistent with Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations for coastal exemption projects. This project, as proposed, will not prejudice the ability of the City to prepare a Local Coastal Program that is in conformity with Chapter 3 of the Coastal Act.

The final factor is whether the appeal raises local issues, or those of regional or statewide significance. Exempting projects from the coastal development permitting process could have negative, cumulative impacts to the coast if the City and other local governments in the coastal zone apply their exemption authority in an improper manner. However, the City properly reviewed this project prior to issuing a coastal exemption and properly applied the relevant exemptions. Therefore, even though the City properly utilized an exemption in this case, the City's approval does raise potential issues of statewide significance because the interpretation and application of Coastal Act exemptions is of statewide importance.

In conclusion, the central issue for the appeal is whether the development constitutes the replacement of the existing residential structure with a new structure, and therefore requires a local CDP. Because the evidence supports exempting the proposed project from Coastal Act permitting requirements, the Commission finds that appeal A-5-VEN-16-0081 raises no substantial issue relative to Section 30610 of the Coastal Act and Sections 13250 and 13252 of the California Code of Regulations. Accordingly, Coastal Exemption No. A-5-VEN-16-0081 will become final upon the Commission's approval of the motion that the appeal raises no substantial issue.



# Location Map: 657 Flower Avenue, Venice

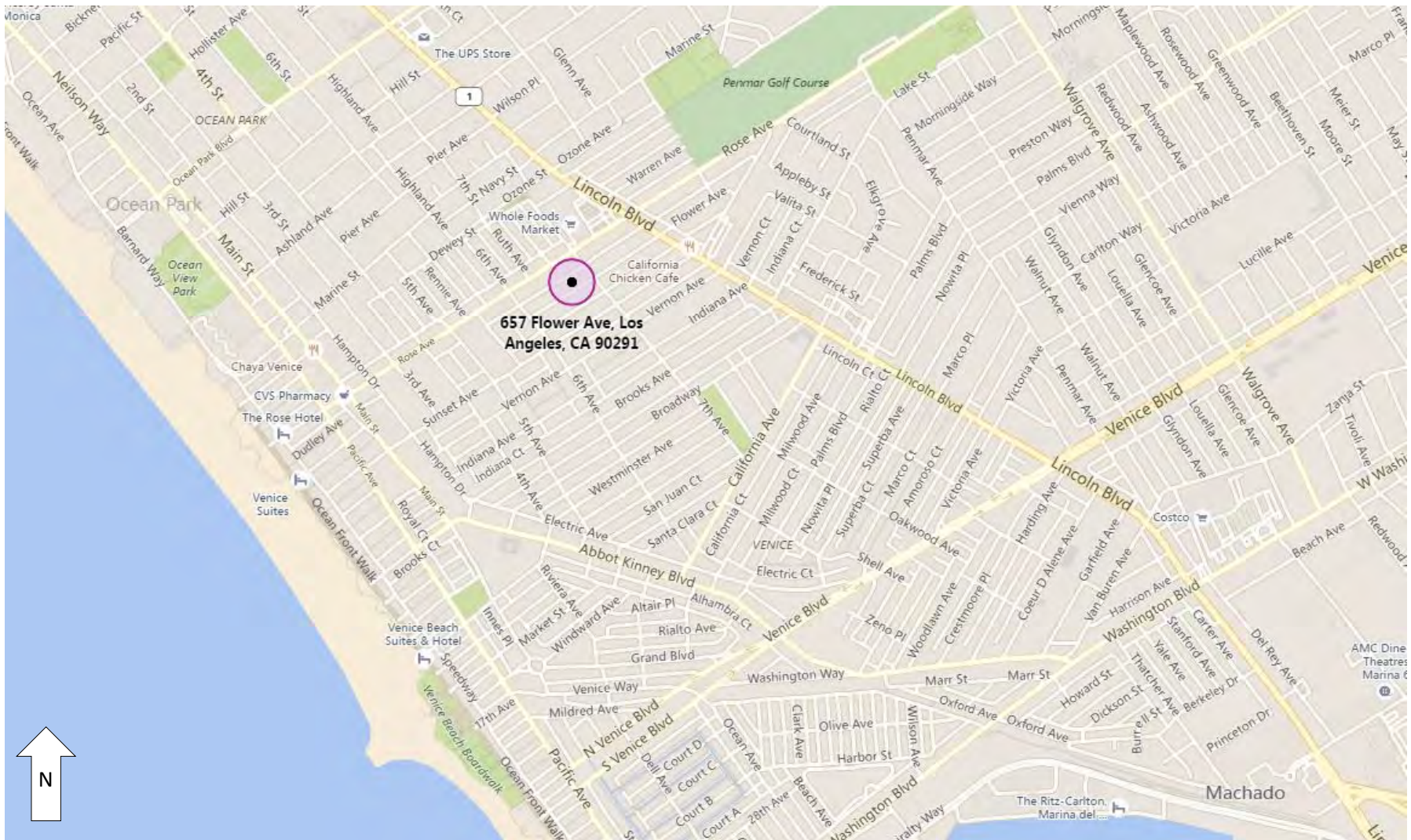


Photo credit: Bing Maps



# Vicinity Map: 657 Flower Avenue, Venice



Photo credit: Bing Maps

# Photo of 657 Flower Avenue, Venice, 3-10-2016



Photo credit: California Coastal Commission Staff

## Exhibit 2

Page 1 of 1



California Coastal  
Commission

**CALIFORNIA COASTAL COMMISSION**

SOUTH COAST DISTRICT OFFICE  
200 OCEANGATE, 10TH FLOOR  
LONG BEACH, CALIFORNIA 90802-4416  
(562) 590-5071 FAX (562) 590-5084

WWW.COASTAL.CA.GOV

**Exhibit 3**

Page 1 of 22



California Coastal  
Commission

**COMMISSION NOTIFICATION OF APPEAL**

September 07, 2016

To: Trevor Martin  
Los Angeles Department of City Planning - Development Services Center  
201 N. Figueroa Street  
Los Angeles, CA 90012

From: Charles Posner

Re: **Commission Appeal No. A-5-VEN-16-0081**

Please be advised that the coastal development permit decision described below has been appealed to the California Coastal Commission pursuant to Public Resources Code Sections 30603 and 30625. Therefore, the decision has been stayed pending Commission action on the appeal pursuant to the Public Resources Code Section 30623.

LOCAL PERMIT #: **DIR-2016-2804-CEX**

APPLICANT(S): **Attn: Kobe Marciano**

DESCRIPTION: Add 3,270.5 sq.ft. & new 483 sq.ft. garage to existing 1,395 sq.ft. 1-story house. The foundation, framing & front façade of existing structure will remain as is. The interior layout will be modified but the perimeter walls not.

LOCATION: 657 E. Flower Ave., Venice, CA 90291 (APN(s): 4240011032)

LOCAL DECISION: Approval; No Special Conditions

APPELLANT(S): Robin Rudisill, Lydia Ponce, and Sue Kaplan

DATE APPEAL FILED: 09/06/2016

The Commission appeal number assigned to this appeal is A-5-VEN-16-0081. The Commission hearing date has not been scheduled at this time. Within 5 working days of receipt of this Commission Notification of Appeal, copies of all relevant documents and materials used in the City of Los Angeles's consideration of this coastal development permit must be delivered to the South Coast District Office of the Coastal Commission (California Administrative Code Section 13112). Please include copies of plans, relevant photographs, staff reports and related documents, findings (if not already forwarded), all correspondence, and a list, with addresses, of all who provided verbal testimony.

**COMMISSION NOTIFICATION OF APPEAL**

A Commission staff report and notice of the hearing will be forwarded to you prior to the hearing. If you have any questions, please contact Charles Posner at the South Coast District Office.

cc: Applicant: Kobe Marciano

Appellant: Robin Rudisill

Appellant: Lydia Ponce

Appellant: Sue Kaplan

Interested Party: Law Office of Steve Kaplan, Attn: Steve Kaplan  
File

RECEIVED  
South Coast Region

SEP 06 2016

CALIFORNIA  
COASTAL COMMISSION

STATE OF CALIFORNIA - THE RESOURCES AGENCY

## CALIFORNIA COASTAL COMMISSION

SOUTH COAST DISTRICT OFFICE  
200 OCEANGATE, 10<sup>TH</sup> FLOOR  
LONG BEACH, CA 90802-4416

VOICE (562) 590-5071 FAX (562) 590-5084

## 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, Lydia Ponce, Sue Kaplan (see attached)

Mailing Address: 3003 Ocean Front Walk

City: Venice

Zip Code: 90291

Phone: 310-721-2343

SECTION II. Decision Being Appealed

1. Name of local/port government:

Los Angeles

2. Brief description of development being appealed:

Add 3,270.5 sq ft &amp; new 483 sq ft garage to existing 1,395 sq ft 1-story house. The foundation, framing &amp; front façade of existing structure will remain as is. The interior layout will be modified but the perimeter walls not (?)

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

657 Flower Ave, APN: 424-001-1032, 7<sup>th</sup> 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-5-VEN-16-0081

DATE FILED:

September 6, 2016

DISTRICT:

South Coast

**APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT**

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: \_\_\_\_\_ None--date field removed from form

7. Local government's file number (if any): DIR-2016-2804-CEX

**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:

Kobe Marciano, 19528 Ventura Blvd., #641, Tarzana, CA 91356

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****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 Project Description indicates that the Applicant proposes to add 3,270.5 square feet to the existing 936 square foot 1-story home. Both numbers are excluding the garage. The Project Description also indicates that the foundation, framing and front façade of the existing structure will remain as is, and that the interior layout will be modified but the perimeter walls not.

The existing home was built in 1922. As noted by the Coastal Commission in its Staff Reports for previous Coastal Exemption appeals, the project cannot disregard the structural integrity of the aged foundation and framing of an existing 1-story structure. Even if the plans do not indicate replacement of floors and walls, the City building inspector may require replacement of these components for safety reasons. The structural integrity of the aged foundation and framing must be considered when considering whether such a project can be done while maintaining 50% or more of the existing structure. Such large projects are likely to require a full demolition of the existing structure, which is development that requires a CDP. In addition, the very large size of the addition and the fact that most of the entire structure is to be demolished leaves little existing structure to add onto or improve, indicates that the development is much more than an "improvement" to a single-family dwelling. As the project is not an improvement to an existing single-family residence, it is therefore non-exempt "development" as defined in the Coastal Act, and thus a CDP should be required.

In addition, the corresponding City permit for compliance with the Venice Coastal Zone Specific Plan, DIR-2015-3655-VSO and related plans (see attached), states that there will be two RAS (roof access structures) a total of 5 parking spaces, and the FAR appears to be approximately 1:1, all of which calls into question whether the project is intended to be for a change of use from a single-family dwelling to a duplex, which requires CDP processing. It should be noted that the Applicant's original project was to go from 1 unit to 2 units. The City Permit also indicates that the project will maintain 55% of the exterior walls, which appears to be in conflict with the Applicant's indication in the CEX description as well as the way in which demolition must be considered (based on amount of structure being demolished).

Thus, the CEX must be revoked and the Applicant requested to obtain a CDP.

In addition, the size and scope of the project necessitate a review of the project for consistency under the CDP process, because the proposed new single-family dwelling is inconsistent with the Community Character policies of the Venice Land Use Plan, the L.A. General Plan and relevant Community Plan for Venice and City Codes. Also, the nature of the proposed project and the City's action are not consistent with the policies of Chapter 3 of the Coastal Act. Because an issue exists with respect to the conformity of the CEX action by the City with the Chapter 3 policies of the Coastal Act, the City's exemption action is invalid and must be voided/revoked. A CDP review is required, during which the proposed development would be reviewed for consistency with the character of the surrounding area. As indicated in prior recent Coastal Staff Reports,

"Community Character issues are particularly important in Venice. Although this exemption relates only to one project, the erosion of community character is a cumulative issue, and the City's cumulative exemption of numerous large-scale remodel and demolition projects has a significant impact on Venice's visual character."

The City's Coastal Exemption process is being used to avoid the CDP process, during which the proposed development would be reviewed for consistency with the character of the surrounding area. Community Character is a significant Coastal Resource, particularly in Venice, which has been designated by the Coastal Commission as a "Special Coastal Community." As also indicated in numerous Coastal Commission reports and decisions, Venice is a Coastal Resource to be protected, and as a primarily residential community, residential development is a significant factor in determining Venice's Community Character. Although this Coastal Exemption relates only to one project, the erosion of Community Character is a cumulative issue, and the City's cumulative exemption of numerous large-scale addition/remodel projects (and the usual associated demolition exceeding 50% of the existing structure) has a significant adverse impact on Venice's character, which is also evidenced by the significant Community concern expressed in numerous other appeals of Coastal Exemptions.

In addition, the Venice Coastal Zone does not have a certified Local Coastal Program, and issuing exemptions for proposed projects like this one, which substantially exceed the mass and scale of the surrounding area and are also significantly larger than the existing structure, set a very damaging precedent. The abuse of the City's Coastal Exemption process in order to avoid obtaining a CDP for new development has been a recurring problem. The City has inadequate controls over the Coastal Exemption process, including a lack of adequate enforcement, resulting in developers frequently ignoring or violating regulations, including demolition of the entire structure even though the project description indicates otherwise. There is generally no penalty applied by the City when this is discovered, other than a requirement to stop work and obtain a CDP, and thus there is little to discourage Applicants from this practice. Very importantly, exempting projects from the CDP process have potential significant negative cumulative impacts to the entire California Coast, as these projects are not being properly reviewed for Community Character and conformance to Chapter 3 of the Coastal Act.

The Coastal Commission-certified Venice Land Use Plan, used as guidance for determining conformity with Chapter 3, states in Policy I. E. 2. ".... All new development and renovations should respect the scale, massing and landscape of existing residential neighborhoods." However, the City does not perform such a review for Coastal Exemptions, including for this project.

Relevant law includes Coastal Act Section 30610 and CCR Section 13250 and 13252 (see attached).

Adjacent neighbors, neighbors in the surrounding area, and all Venice residents are harmed by the project, as well as the cumulative effect of this project and other such projects. Not only are there adverse effects on adjacent and surrounding properties (without an associated public process including Notice, a Public Hearing, transparency, and an Appeal right), but there is a significant adverse impact on the Community Character of Venice, which is a protected Coastal Resource, and which has the result of significantly reducing the long-term value of the Venice Coastal Zone Community and the current and future Quality of Life for all residents of Venice.

This project constitutes the development of a new single-family residence, and therefore the Coastal Exemption (CEX) and the Building Permit must be revoked (or stopped if still in the clearance process) immediately, and a CDP must be obtained in order to ensure that the project conforms to the policies of the certified IUP and Chapter 3 of the Coastal Act, as well as local land use regulations.

## Exhibit 3

Page 6 of 22




California Coastal  
Commission

**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 6, 2016

**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: \_\_\_\_\_

**Exhibit 3**

Page 7 of 22



California Coastal  
Commission



Application:

## COASTAL EXEMPTION (CEX)

CASE NO.: DIR 2016 2804-CEX

TO: California Coastal Commission  
South Coastal District  
200 Oceangate, 10<sup>th</sup> Floor  
Long Beach, CA 90802-4302  
(562) 590-5071

FROM: Los Angeles Department of City Planning  
Development Services Center (DSC)  
201 North Figueroa Street  
Los Angeles, CA 90012

SUBJECT: COASTAL EXEMPTION—SINGLE JURISDICTION AREA ONLYUnder no circumstances shall a Coastal Exemption be issued for the following scopes of work:

- Remodels which involve the removal of 50% or more of existing exterior walls
- Addition, demolition, removal or conversion of any whole residential units (unless required by LADBS)
- Projects which involve significant grading or boring in a Special Grading or Landslide area
- Any change of use (to a more or less intensive use)

## OWNER/APPLICANT TO COMPLETE THE FOLLOWING (type, print, or fill out on-line)

PROJECT ADDRESS: GST E. FLOWERLEGAL DESCRIPTION: LOT 32 BLOCK BLK A TRACT TR 2352ZONE: RD1.5-1 COMMUNITY PLAN: VENTURA

PROPOSED SCOPE OF WORK: Add 3,270.5 sqft + new garage 483 sqft  
to existing 1,395 sqft 1 story house. The foundation,  
framing & front facade of existing structure will remain as is.  
The interior layout will be modified but the perimeter walls not.

RELATED PLAN CHECK NUMBER(s): 16014-20000-02860

Note: If there is related work to be pulled under a separate permit, please include in the above project description. The reason for this is so Planning Staff can evaluate the project as a whole and to avoid having to apply for another CEX for any subsequent permits related to the original scope of work.

Applicant Name: Kobe MarcianoMailing Address: 19528 Ventura Blvd #641, Tarzana CA 91356Phone Number: 310-779-6161E-mail Address: kobemarciano@gmail.comSignature: [Signature]

**THIS SECTION FOR OFFICE USE ONLY**

This application has been reviewed by the staff of the Los Angeles Department of City Planning in accordance with the provisions of Section 3010 of the California Coastal Act. A determination has been made that a Coastal Development Permit is not required for the preceding described project based on the fact that it does not: (1) involve a risk of adverse environmental effect, (2) adversely affect public access, or (3) involve a change in use contrary to any policy of this division pursuant to Title 14 of the California Administrative Code, and qualifies for an exemption under one or more of the categories checked below.

- ☒ **Improvements to Existing Single-Family Residences.** This includes interior and exterior improvements, additions, and uses which are accessory to a single-family residence (e.g. garages, pools, fences, storage). This does not include the increase or decrease in the number of residential dwelling units (including guest houses), or retaining walls or pools that may have a potential significant impact on coastal resources (i.e. viewable from the public right-of-way, involves a significant amount of grading or boring in Hillside, Landslide or Special Grading areas), which may be reviewed on a case-by-case basis.
- ☐ **Improvements to Any Existing Structure Other Than A Single-Family Residence.** For duplex or multifamily residential uses, this includes interior and exterior improvements, additions and uses which are accessory to the residential use (e.g. garages, pools, fences, storage sheds), but does not include the increase or decrease in the number of residential dwelling units, or retaining walls or pools that may have a potential significant impact on coastal resources (i.e. viewable from the public right-of-way, involves a significant amount of grading or boring in Hillside, Landslide or Special Grading areas), which may be reviewed on a case-by-case basis. For non-residential uses, this includes interior and exterior improvements and building signage (excluding pole, pylon and off-site signs), but does not include any addition of square footage or change of use (to a more or less intense use).
- ☐ **Repair or Maintenance.** This includes replacement, repair and/or maintenance activities (i.e. re-roofing, replacement of equipment, etc.) which do not result in any changes, enlargement or expansion.
- ☐ **Demolitions required by LADBS.** This includes projects which have been issued a Nuisance and Abatement or Order to Comply by the Department of Building & Safety requiring demolition due to an unsafe or substandard condition. Please attach the Building & Safety Notice.

This exemption in no way excuses the applicant from complying with all applicable policies, ordinances, codes and regulations of the City of Los Angeles. This exemption shall not apply if the project is not consistent with local land use regulations. If it is found that the project description is not in conformance with the actual project to be constructed or is not in conformance with Section 30610 of the California Coastal Act, this exemption is null and void.

Vincent P. Bertoni, AICP  
Director of Planning

Issued By:

Signature

Print Name and Title

Invoice No.: 31204

Receipt Number: C202339999

Attached:

Copy of Invoice with Receipt No.

Copy of related Building & Safety Clearance Summary Worksheet(s)



## Department of City Planning Case Summary & Documents

Los Angeles, CA



Fair  
77.0 F  
Winds: 6.9 mph  
City / County Traffic

Case Number    Ordinance    Zoning Information    CPC Cards

Case Number: DIR-2016-2804-CEX    Search    Format: AA-YYYY-1234    Example: ZA-2011-3269    Advanced Search Help

Case Number: DIR-2016-2804-CEX

Case Filed On: 08/03/2016

Accepted for review on: 08/03/2016

Assigned Date: 08/03/2016

Staff Assigned: TREVOR MARTIN

Hearing Waived / Date Waived: No /

Hearing Location:

Hearing Date / Time: 12:00 AM

DIR Action: APPROVED

DIR Action Date: 08/03/2016

End of Appeal Period:

Appealed: No

BOE Reference Number:

Case on Hold?: No

Primary Address

Address	CNC	CD
657 E FLOWER AVE 90291 Venice 11		

[View All Addresses](#)

**Project Description:** COASTAL EXEMPTION FOR AN ADDITION OF 3,270.5 SQ. FT. AND NEW 483 SQ. FT. GARAGE TO AN EXISTING 1,395 SQ. FT. 1 STORY SFD. THE FOUNDATION, FRAMING, AND FRONT FACADE OF THE EXISTING STRUCTURE WILL REMAIN

**Requested Entitlement:** COASTAL EXEMPTION FOR AN ADDITION OF 3,270.5 SQ. FT. AND NEW 483 SQ. FT. GARAGE TO AN EXISTING 1,395 SQ. FT. 1 STORY SFD. THE FOUNDATION, FRAMING, AND FRONT FACADE OF THE EXISTING STRUCTURE WILL REMAIN AS IS. THE INTERIOR LAYOUT WILL BE MODIFIED BUT THE PERIMETER WALLS WILL NOT.

**Applicant:** KOBE MARCIANO [ Company: ]

**Representative:**

Permanent Link: <http://planning.lacity.org/pdiscaseinfo/CaseId/MjA5MjAz0>

1 Case Documents found for Case Number: DIR-2016-2804-CEX

Type +	Scan Date	Signed
Initial Actions (1)		
Application	08/04/2016	<a href="#">View</a>

RECEIVED  
South Coast Region

AUG 08 2016

CALIFORNIA  
COASTAL COMMISSION

Application:

## COASTAL EXEMPTION (CEX)

CASE NO.: **DIR 2016 2804 - CEX**

TO: California Coastal Commission  
South Coastal District  
200 OceanGate, 10<sup>th</sup> Floor  
Long Beach, CA 90802-4302  
(562) 590-5071

APPEAL PERIOD ENDS AT 5:00 P.M.

ON 9-10-2016APPEAL RECEIVED: ☐ YES ☒ NO

FROM: Los Angeles Department of City Planning  
Development Services Center (DSC)  
201 North Figueroa Street  
Los Angeles, CA 90012

SUBJECT: COASTAL EXEMPTION—SINGLE JURISDICTION AREA ONLYUnder no circumstances shall a Coastal Exemption be issued for the following scopes of work:

- Remodels which involve the removal of 50% or more of existing exterior walls
- Addition, demolition, removal or conversion of any whole residential units (unless required by LADBS)
- Projects which involve significant grading or boring in a Special Grading or Landslide area
- Any change of use (to a more or less intensive use)

## OWNER/APPLICANT TO COMPLETE THE FOLLOWING (type, print, or fill out on-line)

PROJECT ADDRESS: GST E. FLOWER  
LEGAL DESCRIPTION: LOT 32 BLOCK BLK A TRACT TR 2352  
ZONE: R01.5-1 COMMUNITY PLAN: VENUE  
PROPOSED SCOPE OF WORK: Add 3,270.5 sqft + new Garage 483 sqft  
to existing 1,395 sqft 1 story house. The foundation,  
framing & front facade of existing structure will remain as is.  
The interior layout will be modified, but the perimeter walls not  
RELATED PLAN CHECK NUMBER(s): 16014-20000-02860

Note: If there is related work to be pulled under a separate permit, please include in the above project description. The reason for this is so Planning Staff can evaluate the project as a whole and to avoid having to apply for another CEX for any subsequent permits related to the original scope of work.

Applicant Name: Kobe Marciano  
Mailing Address: 19528 Ventura Blvd #641, Tarzana CA 91356  
Phone Number: 310-779-6161 E-mail Address: KobeMarciano@gmail.com  
Signature: [Signature]

**THIS SECTION FOR OFFICE USE ONLY**

This application has been reviewed by the staff of the Los Angeles Department of City Planning in accordance with the provisions of Section 3010 of the California Coastal Act. A determination has been made that a Coastal Development Permit is not required for the preceding described project based on the fact that it does not: (1) involve a risk of adverse environmental effect, (2) adversely affect public access, or (3) involve a change in use contrary to any policy of this division pursuant to Title 14 of the California Administrative Code, and qualifies for an exemption under one or more of the categories checked below.

- ☒ **Improvements to Existing Single-Family Residences.** This includes interior and exterior improvements, additions, and uses which are accessory to a single-family residence (e.g. garages, pools, fences, storage). This does not include the increase or decrease in the number of residential dwelling units (including guest houses), or retaining walls or pools that may have a potential significant impact on coastal resources (i.e. viewable from the public right-of-way, involves a significant amount of grading or boring in Hillside, Landslide or Special Grading areas); which may be reviewed on a case-by-case basis.
- ☐ **Improvements to Any Existing Structure Other Than A Single-Family Residence.** For duplex or multifamily residential uses, this includes interior and exterior improvements, additions and uses which are accessory to the residential use (e.g. garages, pools, fences, storage sheds), but does not include the increase or decrease in the number of residential dwelling units, or retaining walls or pools that may have a potential significant impact on coastal resources (i.e. viewable from the public right-of-way, involves a significant amount of grading or boring in Hillside, Landslide or Special Grading areas), which may be reviewed on a case-by-case basis. For non-residential uses, this includes interior and exterior improvements and building signage (excluding pole, pylon and off-site signs), but does not include any addition of square footage or change of use (to a more or less intense use).
- ☐ **Repair or Maintenance.** This includes replacement, repair and/or maintenance activities (i.e. re-roofing, replacement of equipment, etc.) which do not result in any changes, enlargement or expansion.
- ☐ **Demolitions required by LADBS.** This includes projects which have been issued a Nuisance and Abatement or Order to Comply by the Department of Building & Safety requiring demolition due to an unsafe or substandard condition. Please attach the Building & Safety Notice.

This exemption in no way excuses the applicant from complying with all applicable policies, ordinances, codes and regulations of the City of Los Angeles. This exemption shall not apply if the project is not consistent with local land use regulations. If it is found that the project description is not in conformance with the actual project to be constructed or is not in conformance with Section 30610 of the California Coastal Act, this exemption is null and void.

Vincent P. Bertoni, AICP  
Director of Planning

Issued By: Trevor Martin

Signature

Trevor Martin, PA  
Print Name and Title

Invoice No.: 31204

Receipt Number: C202339999

Attached:

Copy of Invoice with Receipt No.

Copy of related Building & Safety Clearance Summary Worksheet(s)

**Section 30610 Developments authorized without permit**

*Notwithstanding any other provision of this division, no coastal development permit shall be required pursuant to this chapter for the following types of development and in the following areas:*

*(a) Improvements to existing single-family residences; provided, however, that the commission shall specify, by regulation, those classes of development which involve a risk of adverse environmental effect and shall require that a coastal development permit be obtained pursuant to this chapter.*

**Section 13250 Improvements to Existing Single-Family Residences**

*(a) For purposes of Public Resources Code Section 30610(a) where there is an existing single-family residential building, the following shall be considered a part of that structure:*

*(1) All fixtures and other structures directly attached to a residence;*

*(2) Structures on the property normally associated with a single-family residence, such as garages, swimming pools, fences, and storage sheds; but not including guest houses or self-contained residential units; and*

*(3) Landscaping on the lot.*

Additionally, the Commission typically requires fifty percent of the structure to be maintained in order to qualify as *an existing structure*.

**Section 13252 Repair and Maintenance Activities That Require a Permit**

*(b) Unless destroyed by natural disaster, the replacement of 50 percent or more of a single family residence, seawall, revetment, bluff retaining wall, breakwater, groin or any other structure is not repair and maintenance under Section 30610(d) but instead constitutes a replacement structure requiring a coastal development permit.*



EXCERPTS FROM

VENICE

certified Land Use Plan

Preservation of Venice as a  
Special Coastal Community \*

**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 of 1976.

**Policy I. E. 2. Scale.** New development within the Venice Coastal Zone shall respect the scale and character of 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.

\* **Special Coastal Community:** An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast.



Search

Reports

Resources

News

Help

Site Address

657 E FLOWER AVE

PIN: 111B145 894

657 E FLOWER AVE

Thomas Brothers Grid

PAGE 671 - GRID H4

Assessor Parcel No. (APN)

4240011032

Tract

TR 2352

Map Reference

M B 22-124

Block

BLK A

Lot

32

Arb (Lot Out Reference)

None

Map Sheet

111B145

Jurisdictional

Community Plan Area

Area Planning Commission

Neighborhood Council

Council District

Census Tract #

LADBS District Office

Building Permit Info

Venice

West Los Angeles

Venice

CD 11 - Mike Bonin

2732.00

West Los Angeles

View

Planning and Zoning

Special Notes

Zoning

Zoning Information (ZI)

None

RD1.5-1

[Zi-2408 Director's Interpretation of the Venice SP for Small Lot Subdivision](#)

General Plan Land Use

General Plan Footnote(s)

Hillside Area (Zoning Code)

Baseline Hillside Ordinance

Baseline Manslonization Ordinance

Specific Plan Area

Specific Plan Area

Historic Preservation Review

HistoricPlacesLA

POD - Pedestrian Oriented Districts

CDO - Community Design Overlay

NSO - Neighborhood Stabilization Overlay

Sign District

Streetscape

Adaptive Reuse Incentive Area

Ellis Act Property

Rent Stabilization Ordinance (RSO)

CRA - Community Redevelopment Agency

Central City Parking

Downtown Parking

Building Line

500 Ft School Zone

500 Ft Park Zone

Low Medium II Residential

Yes

No

No

No

Los Angeles Coastal Transportation Corridor

Venice Coastal Zone

No

View

None

None

No

No

No

None

No

No

No

No

No

Assessor

Assessor Parcel No. (APN)

Ownership (Assessor)

Ownership (Bureau of Engineering, Land Records)

APN Area (Co. Public Works)\*

Use Code

Assessed Land Val

Assessed Improvement Val

Last Owner Change

Last Sale Amount

Tax Rate Area

Deed Ref No. (City Clerk)

Deed Ref No. (City Clerk)

Deed Ref No. (City Clerk)

Deed Ref No. (City Clerk)

Deed Ref No. (City Clerk)

Building 1

Year Built

Building Class

Number of Units

Number of Bedrooms

Number of Bathrooms

Building Square Footage

4240011032

0.133 (ac)

0100 - Single Residence

\$1,346,221

\$336,556

03/10/15

\$1,625,016

67

5-702

4-301

255943

2484936

1816363

1922

D45C

1

3

1

936.0 (sq ft)

Streets Copyright (c) Thomas Brothers Maps, Inc.

Generalized Zoning

Terms & Conditions

0.02 Miles

80 Feet

657 Flower Ave



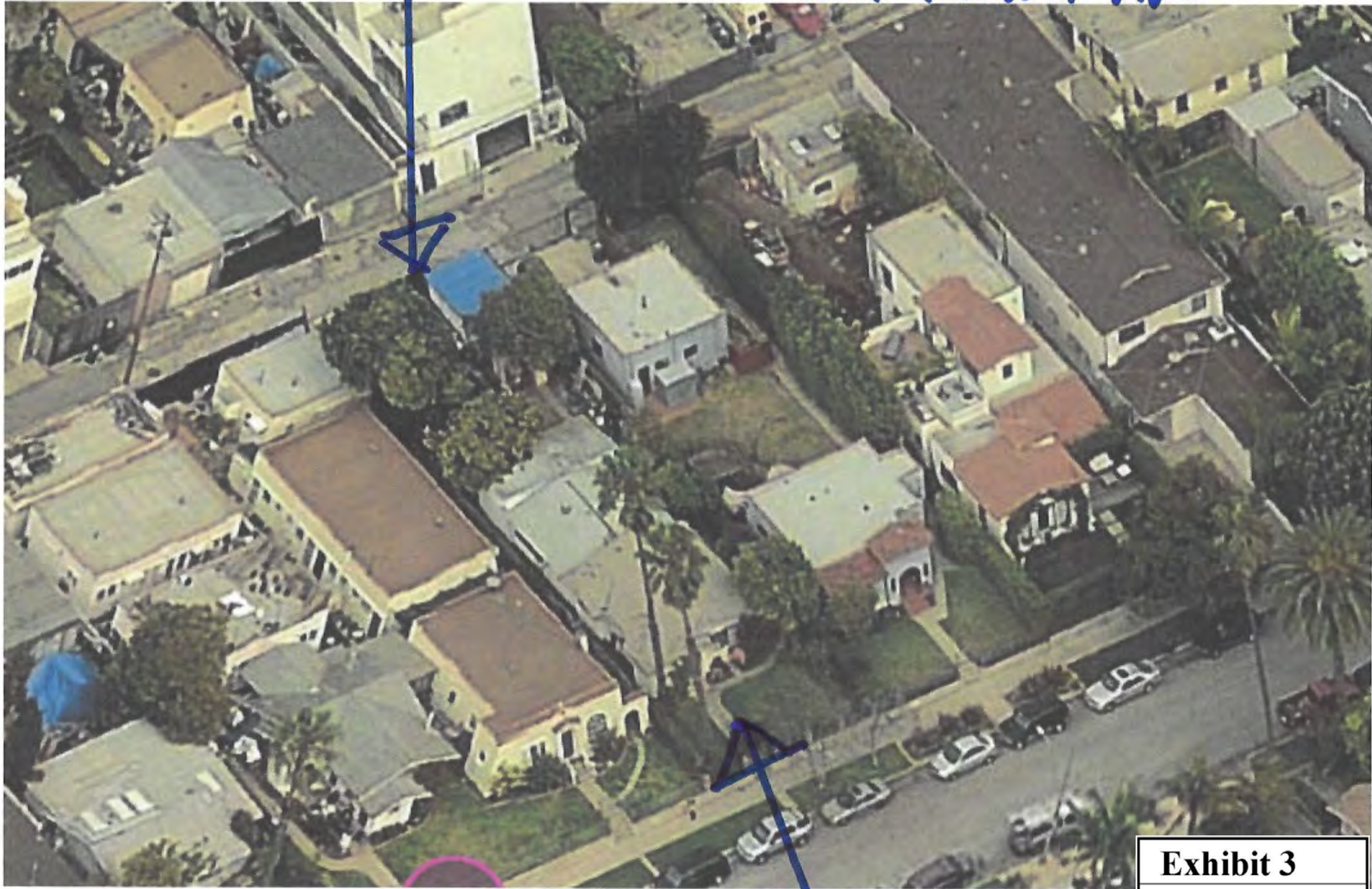
**Exhibit 3**

Page 16 of 22



California Coastal  
Commission

657 Flower Ave



**Exhibit 3**

Page 17 of 22



California Coastal  
Commission



## Los Angeles Department of Building and Safety

The information below was found on the following Parcel Identification Number (PIN):

111B145-894

## + Parcel Profile Report:

1

## - Permit Information found:

2

## Expand Closed 801 W 7TH ST UNIT 4 90291

Application/Permit #	PC/Job #	Type	Status	Work Description
00044 - 20001 - 03095	--	HVAC	Permit Finaled 5/16/2000	CHANGE OF ADDRESS

## Expand Closed 657 E FLOWER AVE 90291

Application/Permit #	PC/Job #	Type	Status	Work Description
15014 - 10000 - 01946	B15LA06259	Bldg-Addition	Refund in Progress 6/23/2016	2-STORY ADDITIONS W/ (N) ATTACHED 2-CAR GARAGE TO (E) 1-STORY SFD   MAJOR ALTERATIONS TO (E) SFD.
16014 - 20000 - 02860	B16VN08125	Bldg-Addition	Reviewed by Supervisor 7/6/2016	ADDITION TO (E) ONE STORY SFD, (N) SECOND STORY & (N) ATT 2 CAR GARAGE. ALL WORK PER ENGINEERING. <b>AAA.</b>
16016 - 20000 - 19974	X16VN16814	Bldg-Alter/Repair	Issued 8/31/2016	Kitchen/bathroom (2) remodel for residential buildings (no structural changes), Replace drywall. (no new walls added). Insulation. Re-stucco for single family dwellings and duplexes only. Re-roof with Class A or B material weighing less than 6 pound per sq. ft. over new solid sheathing. For residential roof replacement > 50% of the total roof area, apply Cool Roof Product labeled and certified by Cool Roof Rating Council (CRRC). Cool Roof may be required for non-residential buildings per Title 24, Part 6, Section 149(b). <b>AAA.</b>
15019 - 10000 - 04668	B15LA18005	Bldg-Demolition	Issued 2/3/2016	Demo garage 10' x 12' demo by handwreck method; Sewer cap is not required per DPI
15019 - 10000 - 03466	B15LA13207	Bldg-Demolition	Application Submittal 9/18/2015	***DPI AND POSTING ONLY*** DEMO (E) DETACHED GARAGE
16041 - 20000 - 31072	X16VN17405	Electrical	Issued 8/31/2016	200 AMP SERVICE UPGRADE AND REWIRE.

# Exhibit 3

Page 19 of 22



California Coastal  
Commission

00044 - 20000 - 03095	--	HVAC	Permit Expired 3/19/2008	INSTALL BATHRO AND DUCTING
16044 - 20000 - 10145	X16VN17404	HVAC	Issued 8/31/2016	NEW SPLIT SYSTEM AND DUCTS
16042 - 20000 - 18312	X16VN17407	Plumbing	Issued 8/31/2016	REPIPE AND INSTALL WATER HEATER.



**Code Enforcement Information:**

1



**Soft-story Retrofit Program Information:**

1

111B145 894



## Los Angeles Department of Building and Safety

## Certificate Information: 657 E FLOWER AVE 90291

**Application / Permit** 16014-20000-02860  
**Plan Check / Job No.** B16VN08125  
**Group** Building  
**Type** Bldg-Addition  
**Sub-Type** 1 or 2 Family Dwelling  
**Primary Use** (1) Dwelling - Single Family  
**Work Description** ADDITION TO (E) ONE STORY SFD, (N) SECOND STORY & (N) ATT 2 CAR GARAGE. ALL WORK  
PER ENGINEERING  
**Permit Issued** No  
**Current Status** Reviewed by Supervisor on 7/6/2016

*Var mgs*

*?*

## Permit Application Status History

Submitted	6/16/2016	APPLICANT
Assigned to Plan Check Engineer	6/30/2016	MENA WASSEF
Green Plans Picked Up	6/30/2016	APPLICANT
Corrections Issued	7/6/2016	MENA WASSEF
Reviewed by Supervisor	7/6/2016	STEVEN KIM
Building Plans Picked Up	7/7/2016	APPLICANT

## Permit Application Clearance Information

Coastal Zone	Not Cleared	7/5/2016	MENA WASSEF
Coastal Zone	Not Cleared	7/6/2016	MENA WASSEF
Specific Plan	Not Cleared	7/6/2016	MENA WASSEF
Eng Process Fee Ord 176,300	Cleared	8/3/2016	ROBERT SAMONTE
Hydrant and Access approval	Cleared	8/3/2016	JOHN DALLAS
Miscellaneous	Cleared	8/3/2016	TREVOR MARTIN
Permit	Cleared	8/3/2016	ROBERT SAMONTE
Sewer availability	Cleared	8/3/2016	ROBERT SAMONTE
Green Code	Cleared	8/22/2016	RICHARD DOCKUS
Low Impact Development	Cleared	8/24/2016	SAM NAVID
Roof/Waste drainage to street	Cleared	8/26/2016	ADRIAN SANCHEZ
Specific Plan	Cleared	8/26/2016	TAIMOUR TANAVOLI

## Contact Information



## Los Angeles Department of Building and Safety

### Certificate Information: 657 E FLOWER AVE 90291

**Application / Permit** 16016-20000-19974  
**Plan Check / Job No.** X16VN16814  
**Group** Building  
**Type** Bldg-Alter/Repair  
**Sub-Type** 1 or 2 Family Dwelling  
**Primary Use** (1) Dwelling - Single Family  
**Work Description** Kitchen/bathroom (2) remodel for residential buildings (no structural changes). Replace drywall. (no new walls added). Insulation. Re-stucco for single family dwellings and duplexes only. Re-roof with Class A or B material weighing less than 6 pound per sq. ft. over new solid sheathing. For residential roof replacement > 50% of the total roof area, apply Cool Roof Product labeled and certified by Cool Roof Rating Council (CRRC). Cool Roof may be required for non-residential buildings per Title 24, Part 6, Section 149(b).  
**Permit Issued** Issued on 8/31/2016  
**Issuing Office** Valley  
**Current Status** Issued on 8/31/2016

*Van Nuys*

### Permit Application Status History

Issued 8/31/2016 LADBS

### Permit Application Clearance Information

No Data Available.

### Contact Information

Contractor Alon Dov; Lic. No.: 630785-B 13811 CALVERT STREET VAN NUYS, CA 91401

### Inspector Information

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

### Pending Inspections

No Data Available.

### Inspection Request History

No Data Available.



**CITY OF LOS ANGELES**  
Department of City Planning – Plan Implementation Division  
City Hall • 200 N. Spring Street, Room 621 • Los Angeles, CA 90012

**DIRECTOR OF PLANNING SIGN-OFF**  
Venice Coastal Zone Specific Plan (Ordinance 175,693)

Case Number	<b>DIR-2015-3655-VSO</b>		Date: 10/28/2015
Project Address	<b>657 E. Flower Ave</b> (Tract 2352; Blk A; Lot 32)		
Zoning: RD1.5-1	Subarea: <b>Oakwood-Milwood-Southeast Venice</b>		
Project Description	Remodel and addition to an (E) one-story SFD and demolition of a detached garage. Project will result in a 2,766 SF ground floor, 3,084 SF second story a roof deck, two RASs, and an attached two car garage. Project will remove/alter 45% of the (E) exterior walls. PCIS# 15014-10000-01946		
Existing Use: one-story SFD + detached garage	Proposed Use: <u>two-story SFD</u> with an attached two-car garage and <u>roof decks</u>		
Applicant Name	Howard Robinson, Howard Robinson & Associates (310) 836-0180		
Applicant Address	8758 Venice Blvd, Ste. 101, Los Angeles, CA 90034		

The project qualifies for an Administrative Clearance, a Specific Plan Project Permit Compliance is not required (pursuant to Section 8 of the Specific Plan) for at least one of the reasons below:

**in the DUAL JURISDICTION**

- ☐ Improvement to an existing single- or multi-family structure that is **not** on a Walk Street

**in the SINGLE JURISDICTION**

- ☒ Improvement to an existing single- or multi-family structure that is **not** on a Walk Street
- ☐ New construction of one single-family dwelling unit, and not more than two condominium units, **not** on a Walk Street
- ☐ New construction of four or fewer units, **not** on a Walk Street
- ☐ Demolition of four or fewer dwelling units; HCIDLA Mello Clearance:

**ANYWHERE in the Coastal Zone**

- ☐ Any improvement to an existing commercial or industrial structure that increases the total occupant load, required parking or customer area by less than 10 percent (<10%)

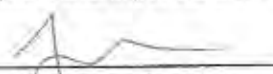
This application has been reviewed by the staff of the Metro Plan Implementation Division, and the proposed project complies with the provisions of the Venice Coastal Zone Specific Plan including all development requirements contained in Section 9, 10.G, and 13, as evidenced below:

Oakwood-Milwood-Southeast Venice Subarea Development Regulations			
Section	Regulation	Proposed Project	complies
9.C. Roof Access Structure (RAS)	10 ft. max. above Flat Roof (25 ft); Area ≤ 100 sq. ft.	35' to top of RAS, 99.8 SF (north) and 99.7 SF (south)	<input checked="" type="checkbox"/>
10.G.2. Density	R2, RD1.5, RD2 zones: max 2 du	Maintain (E) SFD	<input checked="" type="checkbox"/>
10.G.3. Height	Flat Roof – 25'; Varied Roofline – 30'	Max height of 25' to flat roof (roof deck), railings of an open design.	<input checked="" type="checkbox"/>
10.G.4. Access	Alley	Maintain access from Rose Court (alley)	<input checked="" type="checkbox"/>
13. Parking	SF – 2-3 spaces per unit pending width MF – 2 spaces plus 1 guest pending width	Total of 5 parking spaces (two within an attached garage). Project will maintain 55% of the (E) exterior walls.	<input checked="" type="checkbox"/>

2 RAS

5

The proposed project must comply with all other regulations of its subject zone and all other provisions of the Los Angeles Municipal Code (LAMC) and must receive approval from the Los Angeles Department of Building and Safety (LADBS). This Director of Planning Sign-Off is based on the information provided by the applicant. If, at a later date, this information is found to be incorrect or incomplete, this sign-off will become invalid, and any development occurring at that time must cease until appropriate entitlements are obtained.

  
Juliet Oh, Planning Assistant  
Coastal Unit, (213) 978-1186



PLANS PREPARED BY  
**MARC**  
KOBESTRUCTURAL  
ENGINEERING & DESIGN

ENGINEERING:

19528 VENTURA BLVD #641 TARPANA, CA 91356 818-309-2921 KOBEC@PU

OWNER'S INFO:  
657 E FLOWER, Los Angeles, CA 90291

PROJECT DESCRIPTION:  
NEW ADDITION

SHEET TITLE:  
PLOT PLAN

DATE:  
7/17/2016  
SCALE:  
1/8" = 1'-0"  
SHEET:  
A-1

## SCOPE OF WORK:

ADD 3,270.5 SQFT AND 483 SQFT (N) GARAGE TO THE EXISTING 1,395 SQFT. THE NEW ADDITION WILL BE AT THE REAR OF THE EXISTING HOUSE. THE FOUNDATION, FRAMING AND FRONT FACADE OF THE EXISTING STRUCTURE WILL REMAIN AS IS. THE INTERIOR LAYOUT OF THE EXISTING HOUSE WILL BE MODIFIED BUT ITS PERIMETER WALLS AS WELL AS THE ROOF LINES WILL REMAIN AS IS (EXCEPT FOR THE REAR PORTION OF THE EXISTING STRUCTURE WHICH WILL BE SLIGHTLY MODIFIED TO ACCOMMODATE FOR ALL THE NECESSARY CONNECTIONS BETWEEN THE EXISTING & NEW STRUCTURES.) THIS MODIFICATION WILL NOT EXCEED 20% OF THE TOTAL SQFT OF THE EXISTING SURFACES.

NOTE: THE ROOF AND SIDING (OR STUCCO) OF THE EXISTING STRUCTURE WILL BE REPLACED WITH A NEW MATERIAL THAT MATCHES THE NEW ADDITION).

## LEGAL INFO:

Site Address	657 E FLOWER AVE
ZIP Code	90291
PIN Number	111B145 894
Lot/Parcel Area (Calculated)	5,799.6 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H4
Assessor Parcel No. (APN)	4240011032
Tract	TR 2352
Map Reference	M B 22-124
Block	BLK A
Lot	32
Arb (Lot Cut Reference)	None
Map Sheet	111B145
Zoning	RD1.5-1
Year Built	1922
Building Class	D45C
Number of Units	1
Number of Bedrooms	3
Number of Bathrooms	1
Building Square Footage	1,395 (sq ft)

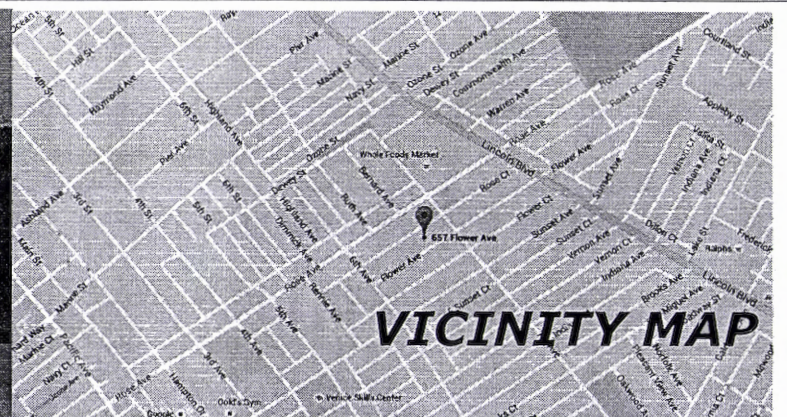
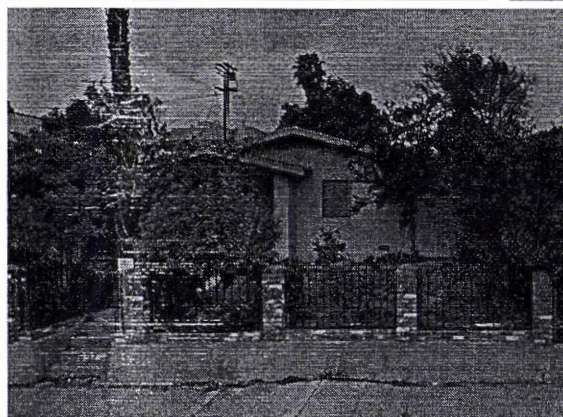
## INDEX SHEET:

A-1: PLOT PLAN  
A-2: NOTES  
A-3: EXISTING & PROPOSED FLOOR PLAN  
A-4: PROPOSED SECOND FLOOR PLAN  
A-5: ELEVATIONS  
A-6: ELEVATIONS  
A-7: SECTIONS  
E-3: PERSPECTIVES  
E-4: PERSPECTIVES  
SN-1: STRUCTURAL NOTES  
S-1: FOUNDATION  
S-2: FRAMING  
S-3: FRAMING  
S-4: STRUCTURAL DETAILS  
S-4.1: STRUCTURAL DETAILS  
S-5: STRUCTURAL DETAILS  
S-5.1: STRUCTURAL DETAILS  
HF1-3: HARDY FRAMES  
G-1: GREEN ENERGY NOTES  
LID: LOW IMPACT DEVELOPMENT STORM WATER  
T24-1: TITLE 24  
T24-2: TITLE 24  
C-1&2: GRADING AND DRAINAGE PLAN

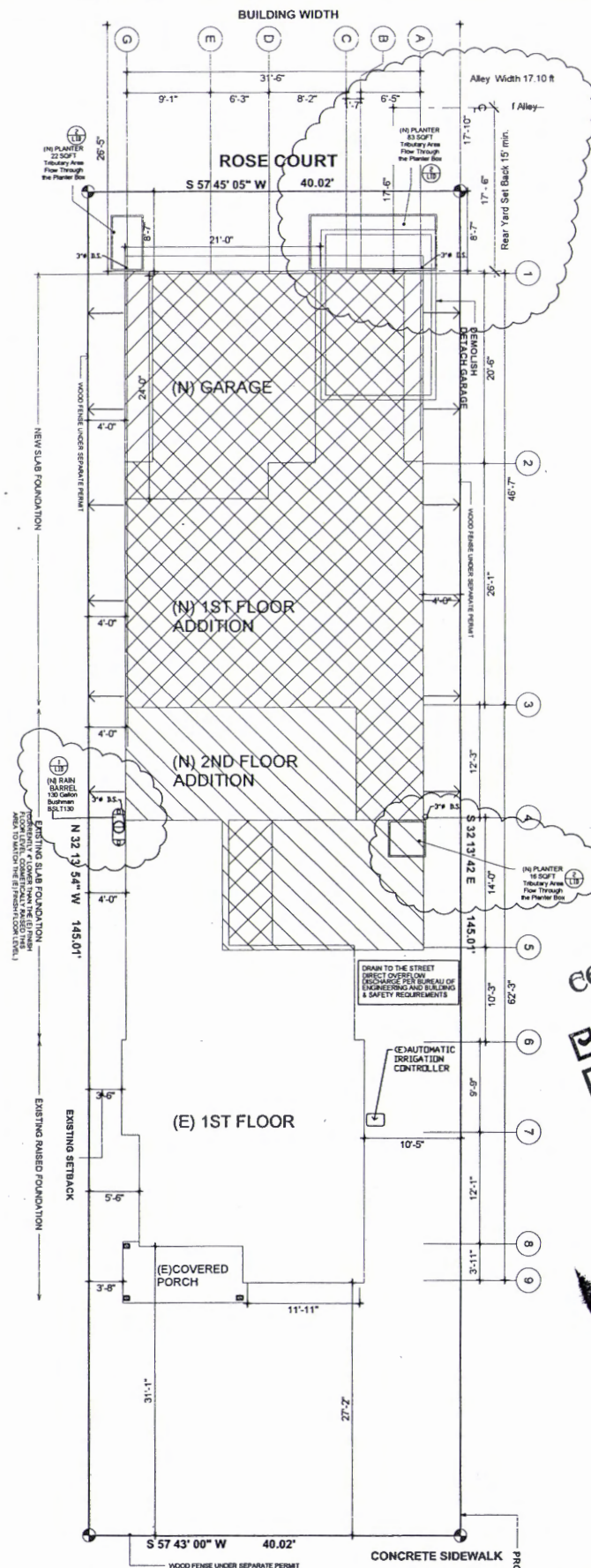
## SITE NOTES

- ALL LANDSCAPING AREAS, INCLUDING THE PARKWAY, SHALL BE AUTOMATICALLY IRRIGATED.
- LOT DRAINAGE SHALL BE CONDUCTED TO THE STREET OR AS SHOWN ON THE PLANS.
- DO NOT BLOCK NATURAL DRAINAGE COURSES FROM ADJACENT PROPERTIES
- IF APPLICABLE, REPLACE ALL BROKEN, CRACKED, OR UPHEAVED CURB, CURB & GUTTER, SIDEWALK, AND DRIVEWAY APRONS AS MAY BE REQUIRED BY THE CITY ENGINEER.
- A SEPARATE PERMIT IS REQUIRED TO PERFORM ALL WORK WITHIN THE STREET RIGHT OF WAY.
- ALL UTILITY SERVICES, INCLUDING TELEPHONE AND ELECTRIC POWER, SHALL BE PLACED UNDERGROUND.
- PUBLIC WORKS PERMIT IS REQUIRED PRIOR TO DOING SIDEWALK OR CURB WORKS.
- NO EASEMENTS ARE SHOWN ON THE SITE
- SEPARATE SUBMITTALS ARE REQUIRED FOR DEMOLITION. OBTAIN AQMD APPROVAL.

- This project shall comply with the state of California Title 24 and the following codes:
- 2013 California Residential Code
- 2013 California Electrical Code
- 2013 California Plumbing Code
- 2013 California Mechanical Code
- 2013 California Green Building Standards Code With Local Amendments
- ((LABC 2014/LARBC 2014))



VICINITY MAP



Los Angeles City Planning  
COASTAL ZONE PLAN APPROVAL  
APPROVAL IN CONCEPT

Single Jurisdiction  
Dual Jurisdiction  
File No.  
Approved by: 8/3/16  
Date:

DIR 2016 2804

Total Areas	
Existing Building	1,395 SqFt (Including 81.5 Sq Ft Front Covered Porche)
New Garage	483 SqFt (Existing Garage Entirely removed)
1st Floor Addition	1,174.5 SqFt
2nd Floor Addition	2,096 Sq Ft
New 2nd Floor Balcony	157 + 42.5 = 199.5 Sq Ft

FLOWER AVE.

1 Site Plan  
1/8" = 1'-0"



SPECIAL HAZARD NOTES

1. Glazing in hazardous locations shall be tempered in the following locations:
- a. At ingress and egress doors.
  - b. Panels in sliding doors or swinging doors.
  - c. Doors and enclosures for hot tubs, bathtubs, and showers. Also glazing in walls enclosing these compartments within 5 feet of the standing surface.
  - d. If within 2 feet of vertical edges of closed doors and within 5 feet of standing surface.
  - e. In wall enclosing stairway landing.

SMOKE DETECTORS/ CARBON MONOXIDE

Smoke and Carbon Monoxide alarms may combined for any purpose units or as part of a permanently installed house fire alarm system installed and maintained to meet 72. Each alarm type must be interconnected so that if on alarm is activated all alarms in the residence of the same type will sound.

City inspector shall check at final inspection that smoke alarms and carbon monoxide alarms have been installed throughout the dwelling in the locations required by code.

2. Smoke detectors shall be provided as follows:

- a. In new construction, smoke detectors shall receive power from the existing house wiring and shall be equipped with battery back up and low battery signal. Smoke detectors shall be located in each sleeping room and hallway or area giving access to a sleeping room, and on each story and basement if present for dwellings with more than one story.
- b. In existing construction, smoke detectors may be battery operated and installed in locations as noted above./
- 3. An approved seismic gas shutoff valve shall be installed on the fuel gas line on the down stream side of the utility meter and be rigidly connected to the exterior of the building or structure containing the fuel gas piping.
- 4. Water heaters must be strapped to the wall.

PLUMBING NOTES

- Kitchen sinks shall not use more than 1.8 gallons per minute (CPC 403.6)
- All lavatories are to use not more than 1.5 gallons per minute (CPC 403.7)
- Showers shall not use more than 2.0 gallons per minute (CPC 408.2)
- Where shower valves are replaced, or are new, they must be pressure balanced or shall be the thermostatic mixing valve type. Minimum clear finished inside clearance shall be 1024 sq. inches and capable of encompassing a 30 inch diameter circle from the top of threshold to 70 inches above the shower drain.
- Shower enclosure doors must be tempered sliding doors.
- New, relocated, or converted tubs or showers may cause a tempered glazing requirement to apply to glass windows with a bottom edge within 60 inches above tub or shower standing surfaces. Cement, fiber-cement, or glass mat gypsum backers shall be used as a base for wall tile in tub and shower areas and wall and ceiling panels in shower areas.
- Water closets shall consume not more than 1.28 gallons per flush

INDOOR WATER USE EFFICIENCY ORDINANCE

TOILETS- 1.28 GALLONS PER FLUSH OR LESS  
SHOWERS- 2.0 GALLONS PER MINUTE OR LESS  
BATHROOM FAUCETS- 1.5 GALLONS PER MINUTE OR LESS  
KITCHEN FAUCETS- 2.2 GALLONS PER MINUTE OR LESS  
CLOTHES WASHERS 6.0 WATER FACTOR OR LESS  
DISHWASHERS- 6.5 GALLONS PER CYCLE OR LESS (OR ENERGY STAR UNIT)

ROOF NOTES

- 1. Roof to be pitched roof with approx. 3:12 slope. Verify roof slope with the existing slope of the house and adjust the slope as necessary for framing and height compliance.
- 2. Roofing materials shall comply with CRC 902.1
- 3. A minimum Class A, B or C roofing shall be installed in areas designated by this section. Classes A, B and C roofing required by this section to be listed shall be tested in accordance with UL 790 or ASTM E 108. The shingle pattern and color shall match the existing as close as possible.
- 4. Roofing shall be installed per manufacturers written specifications.
- 5. Flashings shall be installed in a manner that prevents moisture from entering the wall and roof through joints in copings, through moisture permeable materials and at intersections with parapet walls and other penetrations through the roof plane. Flashings saddles, valleys and drip edges shall be installed per CRC Section 903.
- 6. Newly installed eaves shall have gutters as necessary to conduct water to street, and overhangs shall match existing.
- 7. Fascia boards at gable ends, open rafter tails at horizontal overhangs.
- 8. Starter board at eave overhangs to match existing house.

SPECIAL HAZARD NOTES

- 1. Glazing in hazardous locations shall be tempered in the following locations:
  - a. At ingress and egress doors.
  - b. Panels in sliding doors or swinging doors
  - c. Doors and enclosures for hot tubs, bathtubs, and showers. Also glazing in walls enclosing these compartments within 5 feet of the standing surface.
  - d. If within 2 feet of vertical edges of closed doors and within 5 feet of standing surface.
  - e. In wall enclosing stairway landing.
- 2. Smoke detectors shall be provided as follows:
  - a. In new construction, smoke detectors shall receive power from the existing house wiring and shall be equipped with battery back up and low battery signal. Smoke detectors shall be located in each sleeping room and hallway or area giving access to a sleeping room, and on each story and basement if present for dwellings with more than one story.
  - b. In existing construction, smoke detectors may be battery operated and installed in locations as noted above.
- 3. An approved seismic gas shutoff valve shall be installed on the fuel gas line on the down stream side of the utility meter and be rigidly connected to the exterior of the building or structure containing the fuel gas piping.
- 4. Water heaters must be strapped to the wall.

- 1. Provide emergency egress from sleeping rooms. Where emergency escape and rescue openings are provided they shall have the bottom of the clear opening not greater than 44 inches (1118 mm) measured from the floor. (REF CRC R310.1)
- 2. At least one exit doorway shall not be less than 36 inches wide and 80 inches high. The door shall be mounted that the clear width of 32 inches is maintained.
- 3. The exterior door must open over a landing not more than 12 inches below the threshold. Exception: Providing the door does not swing over the landing, then the landing shall be not more than 8 inches below the threshold.
- 4. The landing at a door shall have a length measured in the direction of travel of no less than 36".

ELECTRICAL PROVISIONS

- Electrical receptacles shall be install to service countertops 12" wide or wider. The receptacles shall be installed so that no point along a wall line is more that 24" horizontally from a receptacle outlet in that space. Counter spaces separated by range tops, refrigerators, or sinks shall be consider separate countertop spaces in applying the spacing requirements. (CEC Art. 210-52(1).
- Provide at least one GFCI protected wall receptacle outlet in bathrooms within 36 inches of the outside edge of each basin. The receptacle outlet shall be located on a wall that is adjacent to the basin location (CEC Art. 210-52(D).
- At least one 20-ampere branch circuit shall be provided to supply bathroom receptacles outlet(s). Such circuits shall have no other outlets.
- At least one receptacle outlet shall be accessible and located at grade level and not more than 6 feet above grade level and shall be installed at the front and back of the dwelling.
- Arc fault circuit- interruption shall be installed to provide protect of the branch circuit.
- Tamper-resistant receptacles shall be installed in all areas specified in 210.52, all non-locking-type 12 volt; 15-and 20-ampere receptacles shall be listed as tamper -resistant receptacles.

GFCI PROTECTED OUTLETS

-Ground-Fault Circuit interrupters are required at each relocated or new receptacle outlets within bathrooms. When existing outlets are removed from their outlet box, the replacement shall also be GFCI protected. Non GFCI outlets shall not be reused. GFCI protection may be accomplished by use of either listed GFCI outlets or by listed GFCI breakers protecting the circuit associated with the outlets in the bathroom.

NOTE:  
All building additions must be adjusted to fit existing conditions. Dimensions, squareness, levelness, plumbness, and roof pitches may vary from that shown from various locations within the building.

GENERAL NOTES

- 1. This project shall comply with the state of California Title 24 and the following codes:
  - 2013 California Residential Code
  - 2013 California Electrical Code
  - 2013 California Plumbing Code
  - 2013 California Mechanical Code
  - 2013 California Green Building
- 2. Separate permits shall be obtained for fences, retaining walls, pools, and spas.
- 3. Curb cuts, storage of materials, or work in the public right of way require a permit from the public works department or appropriate agency.
- 4. All construction waste and debris to be contained at all times
- 5. Contractor shall familiarize him/her self with the project and notify architect of any errors, omissions, or discrepancies in plans prior to commencement.
- 6. Contractor shall notify architect of any changes in plans. Unauthorized changes to the plans are prohibited.
- 7. Contractor shall verify all bearing conditions of existing walls to be removed and notify architect or engineer prior to removal.
- 8. Excavations shall be made in compliance with California/ OSHA regulations.
- 9. Conduct all water from roof and site away from building and adjoining properties to street.
- 10. Verify electrical panel service and upgrade if applicable. Verify with local utility regarding meter and service location.
- 11. An approved seismic gas shutoff valve shall be installed on the down stream side of the utility meter and be rigidly connected to the exterior of the building containing the fuel gas piping.
- 12. Water heaters shall be strapped to the wall per code.
- 13. Contractor shall provide state fire marshall approved smoke dectectors in all installed in the following locations:
  - In each sleeping room.
  - Outside each separate sleeping area in the immediate vicinity of the bedrooms.
  - On each additional story of the dwelling, including basements and habitable attics but not including crawl spaces and uninhabitable attics. In dwellings or dwelling units with split levels and without an intervening door between the adjacent levels, a smoke alarm installed on the upper level shall suffice for the adjacent lower level provided that the lower level is less than one full story below the upper level. (Ref CRC Section 314)
- 14. All exterior materials and manufacturers are to be verified with owner.

PLANS PREPARED BY

MARC

ENGINEERING:

OWNER'S INFO:

657 E FLOWER, Los Angeles, CA 90291

PROJECT DESCRIPTION:

NEW ADDITION

SHEET TITLE:

LOW IMPACT DEVELOPMENT STORM WATER

DATE:

7/15/2016

SCALE:

N.T.S.

SHEET:

A-2



PLANS PREPARED BY

MARC

ENGINEERING: **KOBE STRUCTURAL**  
ENGINEERING & DESIGN

19528 VENTURA BLVD #641 TARZANA, CA 91356 818-309-2921 KOBE@

FLOWER AVE.

OWNERS INFO:  
657 E FLOWER, Los Angeles, CA 90291

PROJECT DESCRIPTION:  
NEW ADDITION

SHEET TITLE:  
FLOOR PLANS

DATE:  
7/17/2016

SCALE:  
3/16" = 1'-0"

SHEET:

A-3

Los Angeles City Planning  
COASTAL ZONE PLAN APPROVAL  
APPROVAL IN CONCEPT

☒ Single Jurisdiction  
☐ Dual Jurisdiction

File No.

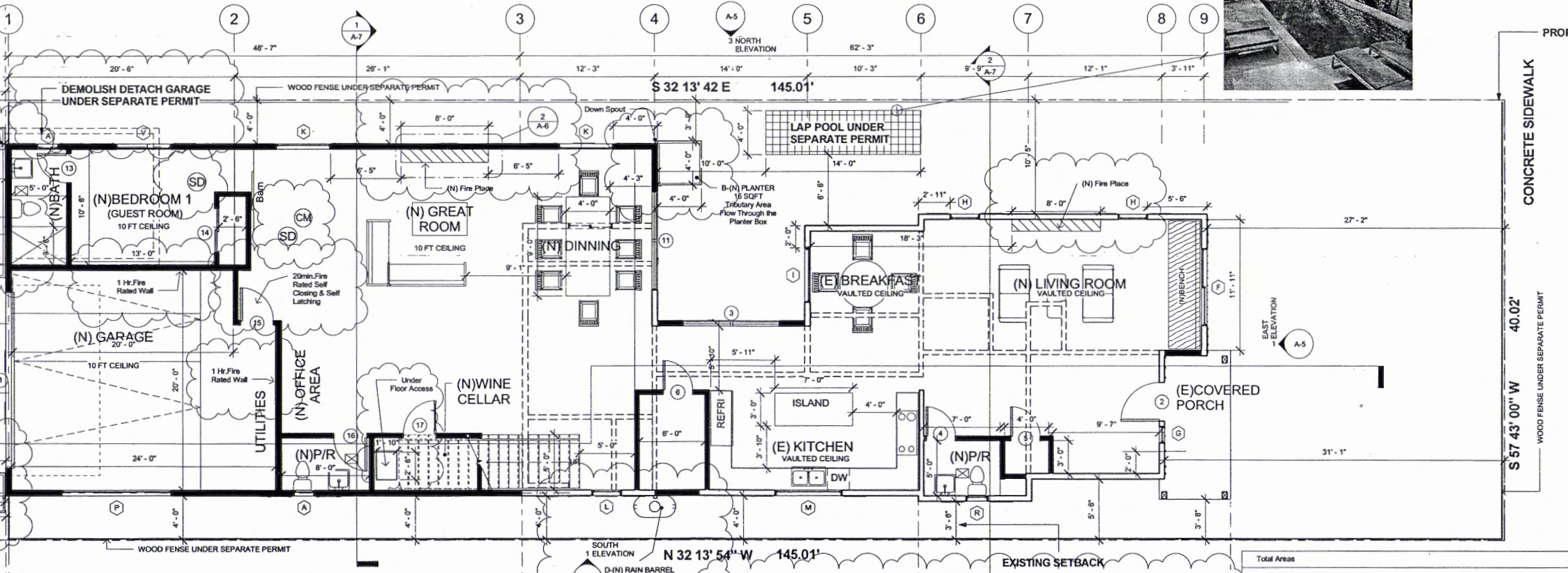
Approved by: *[Signature]*

Date: 8/3/16

DIR 2016 2804

EXISTING FLOOR PLAN  
3/16" = 1'-0"

- LEGEND**
- EXISTING 2X WALLS
  - NEW 2X WALLS
  - DEMO
  - Bathroom Exhaust Fan  
Panasonic FV-08VQL5 WhisperSense-Lite 80 cfm Ceiling Mounted Ventilation Fan with Light, Motion and Humidity Sensor NEW Dual sensor technology with motion sensor, humidity sensor and adjustable delay off timer.
  - SD HARD WIRED SMOKE DETECTOR SEE NOTE BELOW
  - CM CARBON MONOXIDE DETECTOR



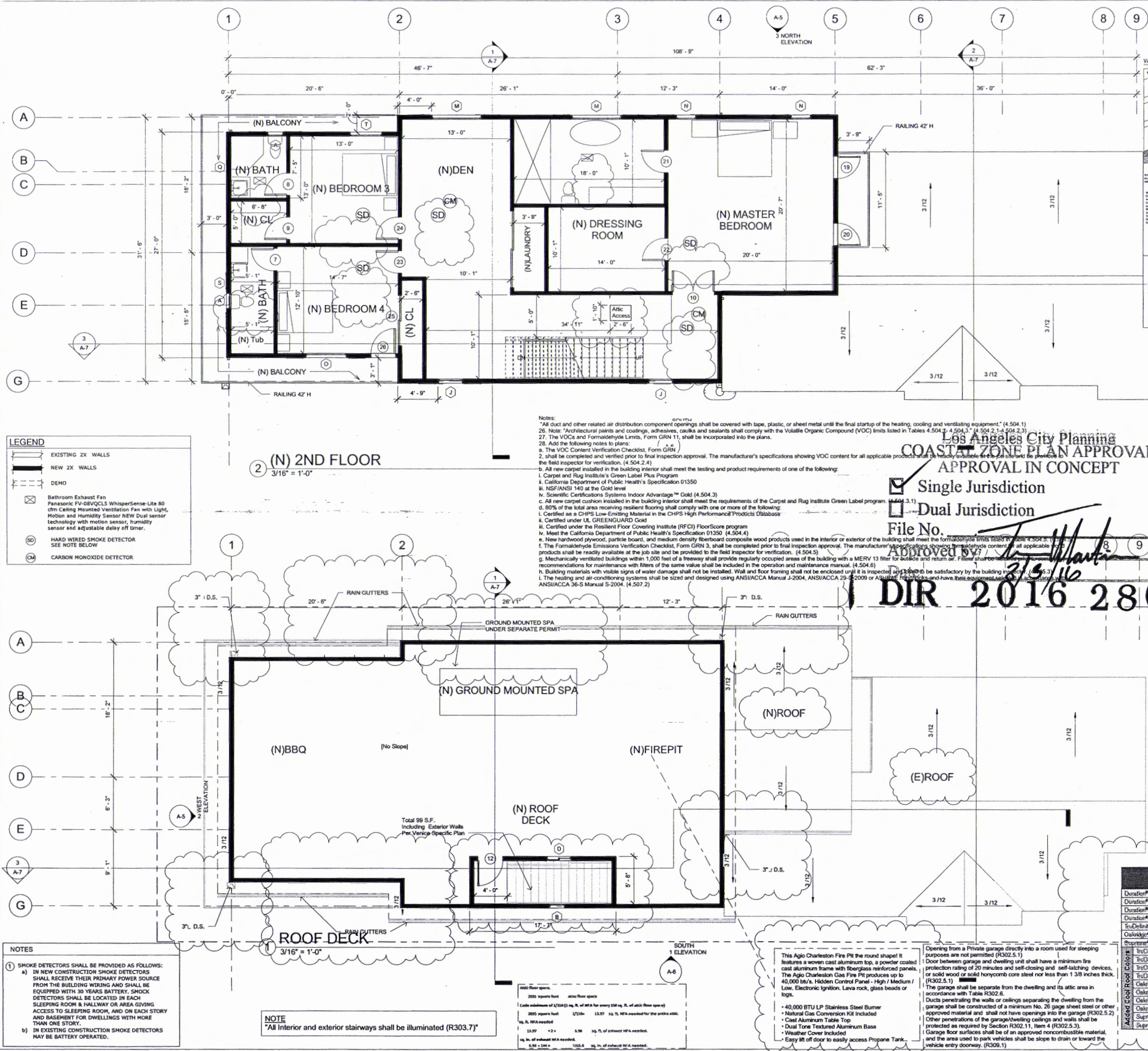
**NOTES**

- SMOKE DETECTORS SHALL BE PROVIDED AS FOLLOWS:  
a) IN NEW CONSTRUCTION SMOKE DETECTORS SHALL RECEIVE THEIR PRIMARY POWER SOURCE FROM THE BUILDING WIRING AND SHALL BE EQUIPPED WITH 30 YEAR BATTERY. SMOKE DETECTORS SHALL BE LOCATED IN EACH SLEEPING ROOM & HALLWAY OR AREA GIVING ACCESS TO SLEEPING ROOM, AND ON EACH STORY AND BASEMENT FOR DWELLINGS WITH MORE THAN ONE STORY.  
b) IN EXISTING CONSTRUCTION SMOKE DETECTORS MAY BE BATTERY OPERATED.

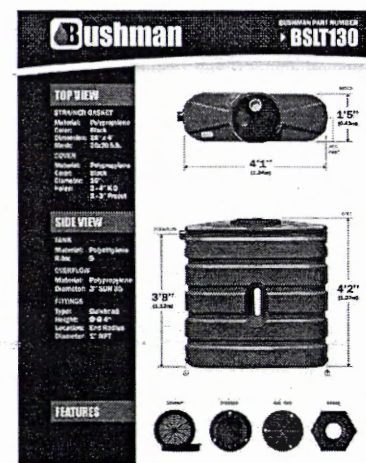
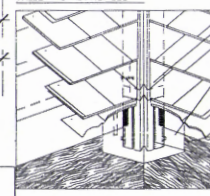
**NOTE**  
All interior and exterior stairways shall be illuminated (R303.7)

**Total Areas**

Existing Building	1,395 Sq Ft (Including 81.5 Sq Ft Front Covered Porch)
New Garage	483 Sq Ft (Existing Garage Entirely removed)
1st Floor Addition	1,174.5 Sq Ft
2nd Floor Addition	2,096 Sq Ft
New 2nd Floor Balcony	157 + 42.5 = 199.5 Sq Ft



Door Schedule			
Mark	Count	Width	Height
1	1	16'-0"	8'-0"
2	1	3'-6"	7'-0"
3	1	9'-0"	8'-0"
4	1	2'-8"	8'-0"
5	1	2'-8"	8'-0"
6	1	2'-8"	8'-0"
7	1	2'-8"	8'-0"
8	1	2'-8"	8'-0"
9	1	2'-8"	8'-0"
10	1	5'-0"	8'-0"
11	1	9'-0"	8'-0"
12	1	3'-0"	6'-8"
13	1	2'-8"	7'-0"
14	1	4'-0"	6'-8"
15	1	3'-0"	8'-0"
16	1	3'-0"	8'-0"
17	1	3'-0"	8'-0"
19	1	2'-8"	8'-0"
20	1	2'-8"	8'-0"
21	1	2'-8"	8'-0"
22	1	2'-8"	8'-0"
23	1	2'-8"	8'-0"
24	1	2'-8"	8'-0"
25	1	6'-0"	7'-0"
26	1	3'-0"	8'-0"
27	1	9'-2"	6'-8"



Type Mark	Rough Opening		Type	Head Height	Count
	Width	Height			
A	2' - 0"	4' - 0"	Casement with Trim	8' - 0"	4
B	2' - 0"	2' - 0"	Casement with Trim	6' - 8"	1
D	3' - 0"	3' - 0"	Slider with Trim	6' - 8"	1
F	7' - 0"	6' - 0"	Casement with Trim	6' - 8"	1
G	1' - 6"	6' - 0"	Double Hung with Trim	6' - 8"	1
H	2' - 8"	6' - 0"	Casement with Trim	6' - 8"	2
I	5' - 0"	6' - 0"	Fixed with Trim	8' - 0"	1
J	3' - 0"	7' - 0"	Fixed with Trim	8' - 0"	2
K	5' - 0"	7' - 0"	Fixed with Trim	8' - 0"	2
L	2' - 8"	6' - 0"	Fixed with Trim	9' - 0"	1
M	6' - 0"	4' - 6"	Casement with Trim		3
N	2' - 6"	6' - 0"	Casement with Trim	8' - 0"	2
O	5' - 0"	4' - 0"	Casement with Trim	8' - 0"	1
P	10' - 0"	2' - 0"	Casement with Trim	8' - 0"	1
Q	7' - 0"	1' - 0"	Casement with Trim	9' - 11 3/4"	1
R	2' - 0"	4' - 0"	Casement with Trim	6' - 8"	1
S	10' - 0"	1' - 0"	Casement with Trim	10' - 0"	1
T	4' - 0"	5' - 0"	Casement with Trim	8' - 0"	1
V	5' - 0"	4' - 6"	Casement with Trim	8' - 0"	1

Dispers Coming Cool Roof Shingles	CRRC Product ID	Warranty	Solar Reflectance (aged)	Thermal Emittance (initial)	Solar Reflectance Index (SRi) (initial)
Duraflex® Premium Cool Hammer-Fog	0890-0004	Limited Lifetime**	0.90	0.90	32
Duraflex® Premium Cool Frosted Oak	0890-0006	Limited Lifetime**	0.98	0.91	30
Duraflex® Premium Cool Sage	0890-0008	Limited Lifetime**	0.98	0.88	30
Duraflex® Premium Cool Sunrise	0890-0006	Limited Lifetime**	0.98	0.91	30
TriDefinix® Duraflex® Shasta White	0890-0008	Limited Lifetime**	0.98	0.91	30
Oakridge® Shasta White	0890-0002	Limited Lifetime**	0.98	0.91	30
Supreme® Shasta White	0890-0001	25 Years	0.98	0.92	31
TriDefinix® Duraflex® Amber	0890-0009	Limited Lifetime**	0.92**	0.92	22
TriDefinix® Duraflex® Sierra Gray	0890-0013	Limited Lifetime**	0.92**	0.92	21
TriDefinix® Duraflex® Antique Silver	0890-0011	Limited Lifetime**	0.92**	0.92	22
TriDefinix® Duraflex® Oyster Shell	0890-0012	Limited Lifetime**	0.92**	0.92	24
Oakridge® Amber	0890-0009	Limited Lifetime**	0.92**	0.92	24
Oakridge® Sierra Gray	0890-0013	Limited Lifetime**	0.92**	0.92	20
Oakridge® Antique Silver	0890-0011	Limited Lifetime**	0.92**	0.92	24
Oakridge® Oyster Shell	0890-0012	Limited Lifetime**	0.92**	0.92	24
Supreme® Amber	0650-0014	25 Years	0.92**	0.92	24
Supreme® Aspen Gray	0680-0010	25 Years	0.90**	0.95	20

This Alugo Charleston Fire Pit the round shaped it features a woven cast aluminum top, a powder coated aluminum frame with EPOXY resin finished panels. The Alugo Charleston Gas Fire Pit produces up to 40,000 Btu's. Hidden Control Panel - High / Medium / Low, Electronic Ignition, Lava rock, glass beads / lava.

Operating from a Private garage directly into a room used for sleeping purposes are not permitted (R302.5.1)

Door between garage and dwelling unit shall have a minimum fire protection rating of 20 minutes and self-closing and self-latching device on solid wood or solid honeycomb core steel not less than 1 3/8 inches thick. (R302.5.1) (R302.5.2)

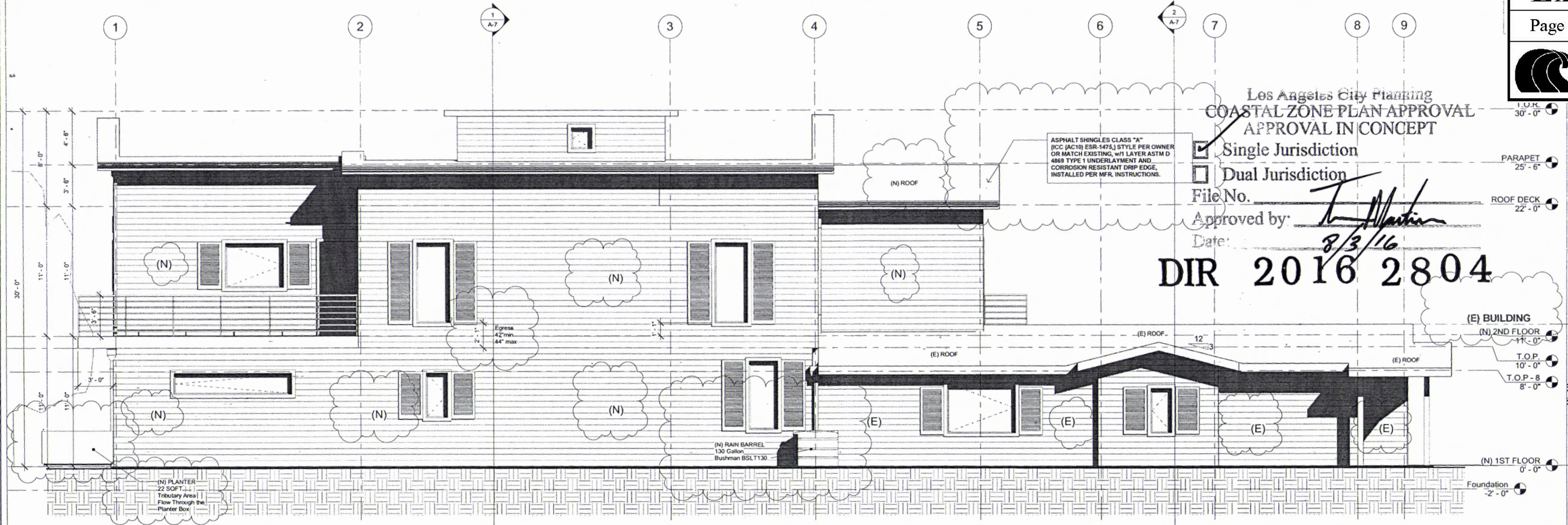
The garage shall be separated from the dwelling and its attic area in accordance with Table R302.6.

Ducts penetrating the walls or ceilings separating the dwelling from the garage shall be constructed of a minimum No. 26 gauge steel sheet or other approved material and approved fire stoppers into the dwelling (R302.5.2)

Other penetrations of the garage/dwelling ceilings and walls shall be protected as required by Section R302.11, Item 4 (R302.5.3)

Garage floor surfaces shall be approved noncombustible material and the area used to park vehicles shall be sloped to drain or toward the vehicle entry doorway. (R309.1)

- 40,000 BTU LP Stainless Steel Included
- Natural Gas Conversion Kit Included
- Aluminum Table Top
- Dual Tone Textured Aluminum Base
- Lava Rock Surface Included
- Easy Lift Out door to easily access Propane Tank.



PLANS PREPARED BY  
**MARC**  
**KOBE STRUCTURAL**  
 ENGINEERING & DESIGN  
 19528 VENTURA BLVD #641 TARCANA, CA 91356 818-309-2821 KOBE@  
 ENGINEERING: **KOBE**

OWNERS INFO:  
 657 E FLOWER, Los Angeles, CA 90291

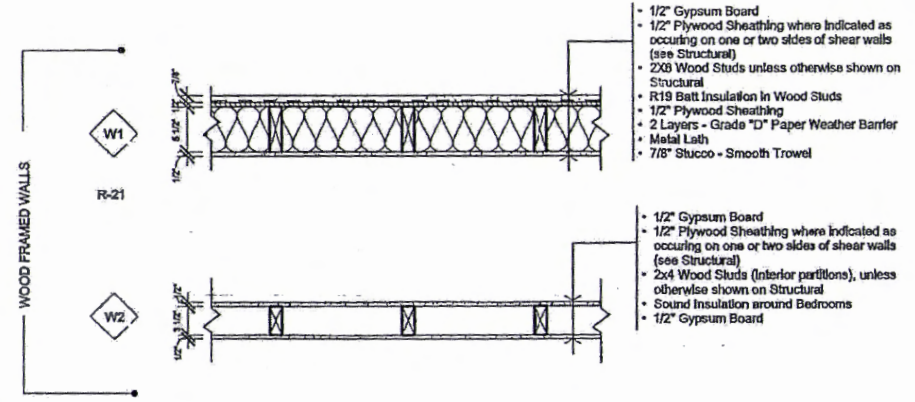
PROJECT DESCRIPTION:  
**NEW ADDITION**

SHEET TITLE:  
**ELEVATIONS**

DATE:  
 7/17/2016  
 SCALE:  
 As indicated  
 SHEET:  
**A-6**

## 1 SOUTH ELEVATION

- NOTES**
- THE CONSTRUCTION SHALL NOT RESTRICT A FIVE-FOOT CLEAR AND UNOBSTRUCTED ACCESS TO ANY WATER OR POWER DISTRIBUTION FACILITIES (POWER POLES, PULL-BOXES, TRANSFORMERS, VAULTS, PUMPS, VALVES, METERS, APPURTENANCES, ETC.) OR TO THE LOCATION OF THE HOOK-UP. THE CONSTRUCTION SHALL NOT BE WITHIN TEN FEET OF ANY POWER LINES WHETHER OR NOT THE LINES ARE LOCATED ON THE PROPERTY. FAILURE TO COMPLY MAY CAUSE CONSTRUCTION DELAYS AND/OR ADDITIONAL EXPENSES.
  - AN APPROVED SEISMIC GAS SHUTOFF VALVE WILL BE INSTALLED ON THE FUEL GAS LINE ON THE DOWNSTREAM SIDE OF THE UTILITY METER AND BE RIGIDLY CONNECTED TO THE EXTERIOR OF THE BUILDING OR STRUCTURE CONTAINING THE FUEL GAS PIPING. (PER ORDINANCE 170,158)(SEPARATE PLUMBING PERMIT IS REQUIRED).
  - PLUMBING FIXTURES ARE REQUIRED TO BE CONNECTED TO A SANITARY SEWER OR TO AN APPROVED SEWAGE DISPOSAL SYSTEM (R306.3).
  - KITCHEN SINKS, LAVATORIES, BATHTUBS, SHOWERS, BIDETS, LAUNDRY TUBS AND WASHINGS MACHINE OUTLETS SHALL BE PROVIDE WITH HOT AND COLD WATER AND CONNECTED TO AN APPROVED WATER SUPPLY (R306.4).
  - BATHTUB AND SHOWER FLOORS, WALLS ABOVE BATHTUBS WITH A SHOWER COMPARTMENTS SHALL BE FINISHED WITH A NONABSORBENT SURFACE. SUCH WALL SURFACES SHALL EXTEND TO A HEIGHT OF NOT LESS THAN 6 FEET ABOVE THE FLOOR (R307.2).
  - PROVIDE ULTRA-LOW FLUSH WATER CLOSETS FOR ALL NEW CONSTRUCTION. EXISTING SHOWER HEADS AND TOILETS MUST BE ADAPTED FOR LOW WATER CONSUMPTION.
  - UNIT SKYLIGHTS SHALL BE LABELED BY A LA CITY APPROVED LABELING AGENCY. SUCH LABEL SHALL STATE THE APPROVED LABELING AGENCY NAME, PRODUCT DESIGNATION AND PERFORMANCE GRADE RATING. (RESEARCH REPORT NOT REQUIRED). (R308.6.9)
  - WATER HEATER MUST BE STRAPPED TO WALL. (SEC. 507.3, LAPC)
  - AUTOMATIC GARAGE DOOR OPENERS, IF PROVIDED, SHALL BE LISTED IN ACCORDANCE WITH UL 325. (R309.4)
  - SMOKE DETECTORS SHALL BE PROVIDE FOR ALL DWELLING UNITS INTENDED FOR HUMAN OCCUPANCY, UPON THE OWNER'S APPLICATION FOR A PERMIT FOR ALTERATIONS, REPAIRS, OR ADDITIONS, EXCEEDING ONE THOUSAND DOLLARS (\$1,000).
  - WHERE A PERMIT IS REQUIRED FOR ALTERATIONS, REPAIRS OR ADDITIONS EXCEEDING ONE THOUSAND DOLLARS (\$1,000), EXISTING DWELLINGS OR SLEEPING UNITS THAT HAVE ATTACHED GARAGES OR FUEL-BURNING APPLIANCES SHALL BE PROVIDED WITH A CARBON MONOXIDE ALARM IN ACCORDANCE WITH SECTION R315.2 CARBON MONOXIDE ALARMS SHALL ONLY BE REQUIRED IN THE SPECIFIC DWELLING UNIT OR SLEEPING UNIT FOR WHICH THE PERMIT WAS OBTAINED. (R315.2.2).
  - EVERY SPACE INTENDED FOR HUMAN OCCUPANCY SHALL BE PROVIDED WITH NATURAL LIGHT BY MEANS OF THE EXTERIOR GLAZED OPENINGS IN ACCORDANCE WITH SECTION R303.1 OR SHALL BE PROVIDED WITH ARTIFICIAL LIGHT THAT IS ADEQUATE TO PROVIDE AN AVERAGE ILLUMINATION OF 6 FOOT-CANDLES OVER THE AREA OF THE ROOM AT A HEIGHT OF 30 INCHES ABOVE THE FLOOR LEVEL. (R303.1).
  - A COPY OF THE EVALUATION REPORT AND/OR CONDITIONS OF LISTING SHALL BE MADE AVAILABLE

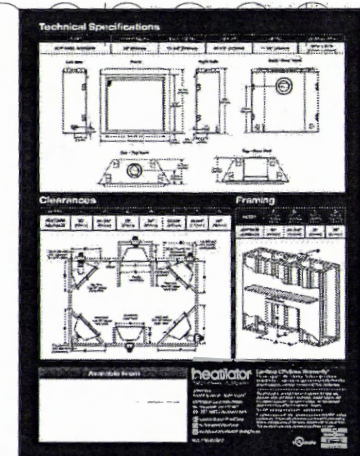


## 3 WALL TYPES

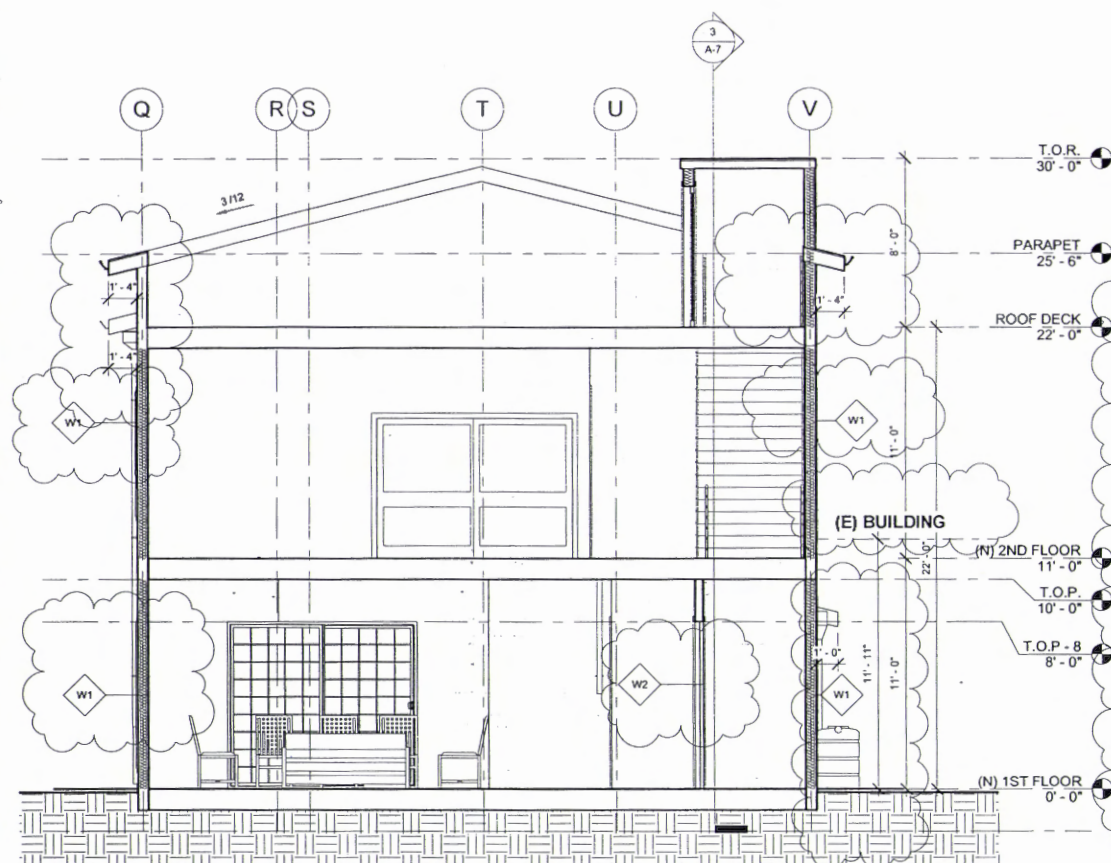
- NOTE**  
 \*At bedrooms provide one openable escape window or door meeting all of the following: an openable area of not less than 5.7 sq. ft. (5 sq. ft. at grade level), a minimum clear 24" with, and sill height not over 44 inches above the floor. CRC 310.1"
- NOTES:**
- BUILDING SHALL HAVE APPROVED ADDRESS NUMBERS, BUILDING NUMBERS OR APPROVED BUILDING IDENTIFICATION PLACED IN A POSITION THAT IS PLAINLY LEGIBLE AND VISIBLE FROM THE STREET OR ROAD FRONTING THE PROPERTY (R319.1)
  - PROTECTION OF WOOD AND WOOD BASED PRODUCTS FROM DECAY SHALL BE PROVIDED IN THE LOCATIONS SPECIFIED PER SECTION R317.1 BY THE USE OF NATURALLY DURABLE WOOD OR WOOD THAT IS PRESERVATIVE-TREATED IN ACCORDANCE WITH AWPA U1 FOR THE SPECIES, PRODUCT, PRESERVATIVE AND END USE. PRESERVATIVES SHALL BE LISTED IN SECTION 4 OF AWPA U1.
- NOTE**  
 \*All interior and exterior stairways shall be illuminated (R303.7)"

## 2 FIRE PLACE DETAIL

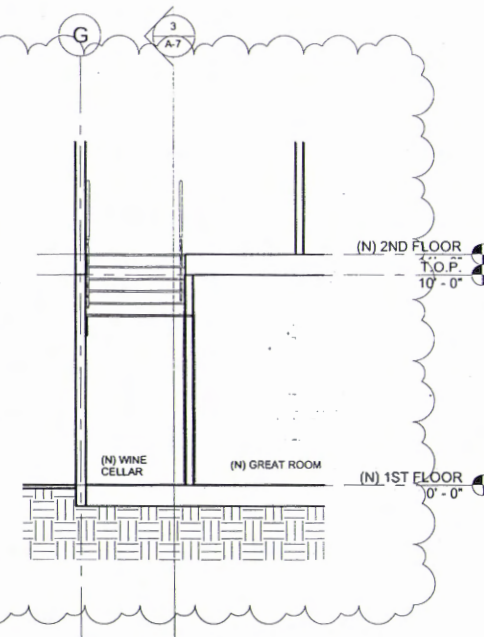
- NOTES:**
- AN APPROVED SMOKE ALARM SHALL BE INSTALLED IN EACH SLEEPING ROOM & HALLWAY OR AREA GIVING ACCESS TO A SLEEPING ROOM, AND ON EACH STORY AND BASEMENT FOR DWELLINGS WITH MORE THAN ONE STORY. SMOKE ALARMS SHALL BE INTERCONNECTED SO THAT ACTUATION OF ONE ALARM WILL ACTIVATE ALL THE ALARMS WITHIN THE INDIVIDUAL DWELLING UNIT. IN NEW CONSTRUCTION SOURCE FROM THE BUILDING WIRING AND SHALL BE EQUIPPED WITH BATTERY BACK-UP AND LOW BATTERY SIGNAL. (R314)
  - AN APPROVED CARBON MONOXIDE ALARM SHALL BE INSTALLED IN DWELLING UNITS AND IN SLEEPING UNITS WITHIN WHICH FUEL-BURNING APPLIANCES ARE INSTALLED AND IN DWELLING UNITS THAT HAVE ATTACHED GARAGES. CARBON MONOXIDE ALARM SHALL BE PROVIDE OUTSIDE OF EACH SEPARATE DWELLING UNIT SLEEPING AREA IN THE IMMEDIATE VICINITY OF THE BEDROOM(S) AND ON EVERY LEVEL OF A DWELLING UNIT INCLUDING BASEMENTS.



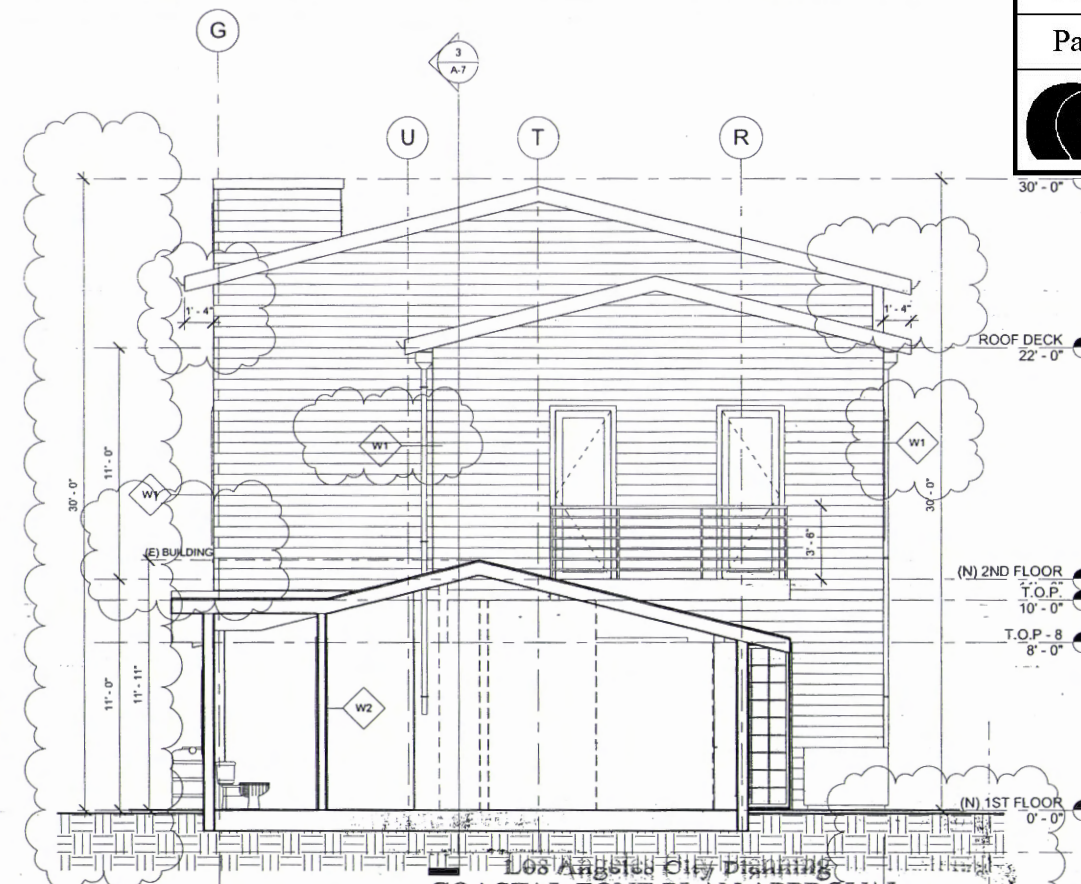
- NOTES:**
- GLAZING IN THE FOLLOWING LOCATIONS SHALL BE SAFETY GLAZING CONFORMING TO THE HUMAN IMPACT LOADS OF SECTIONS R308.3 (SEE EXCEPTIONS) (R308.4):
- FIXED AND OPERABLE PANELS OF SWINGING, SLIDING AND BI-FOLD DOOR ASSEMBLIES.
  - GLAZING IN AN INDIVIDUAL FIXED OR OPERABLE PANEL ADJACENT TO A DOOR WHERE THE NEAREST VERTICAL EDGE IS WITHIN A 24-INCH ARC OF EITHER VERTICAL EDGE OF THE DOOR IN A CLOSED POSITION AND WHOSE BOTTOM EDGE IS LESS THAN 60 INCHES ABOVE THE FLOOR OR WALKING SURFACE.
  - GLAZING IN AN INDIVIDUAL FIXED OR OPERABLE PANEL THAT MEETS ALL OF THE FOLLOWING CONDITIONS:
    - EXPOSED AREA OF THE INDIVIDUAL PANE GREATER THAN 9 SQUARE FEET.
    - BOTTOM EDGE LESS THAN 18 INCHES ABOVE THE FLOOR.
    - TOP EDGE GREATER THAN 36 INCHES HORIZONTALLY OF THE GLAZING.
  - GLAZING IN RAILING.
  - GLAZING IN ENCLOSURES FOR OR WALLS FACING HOT TUBS, WHIRL POOLS, SAUNAS, STEAM ROOMS, BATHTUBS AND SHOWERS WHERE THE BOTTOM EDGE OF GLAZING IS LESS THAN 60 INCHES MEASURED VERTICALLY ABOVE ANY STANDING OR WALKING SURFACE.
  - GLAZING IN WALLS AND FENCES ADJACENT TO INDOOR AND OUTDOOR SWIMMING POOLS, HOT TUBS AND SPAS WHERE THE BOTTOM EDGE OF THE GLAZING IS LESS THAN 60 INCHES ABOVE A WALKING SURFACE AND WITHIN 60 INCHES, MEASURED HORIZONTALLY AND IN STRAIGHT LINE, OF THE WATER'S EDGE.
  - GLAZING WHERE THE BOTTOM EXPOSED EDGE OF THE GLAZING IS LESS THAN 36 INCHES ABOVE THE PANE OF THE ADJACENT WALKING SURFACE OF STAIRWAYS, LANDINGS BETWEEN FLIGHTS OF THE STAIRS AND RAMPS.
  - GLAZING ADJACENT TO THE LANDING AT THE BOTTOM OF A STAIRWAY WHERE THE GLAZING IS LESS THAN 36 INCHES ABOVE THE LANDING AND WITHIN 60 INCHES HORIZONTALLY OF THE BOTTOM TREAD.



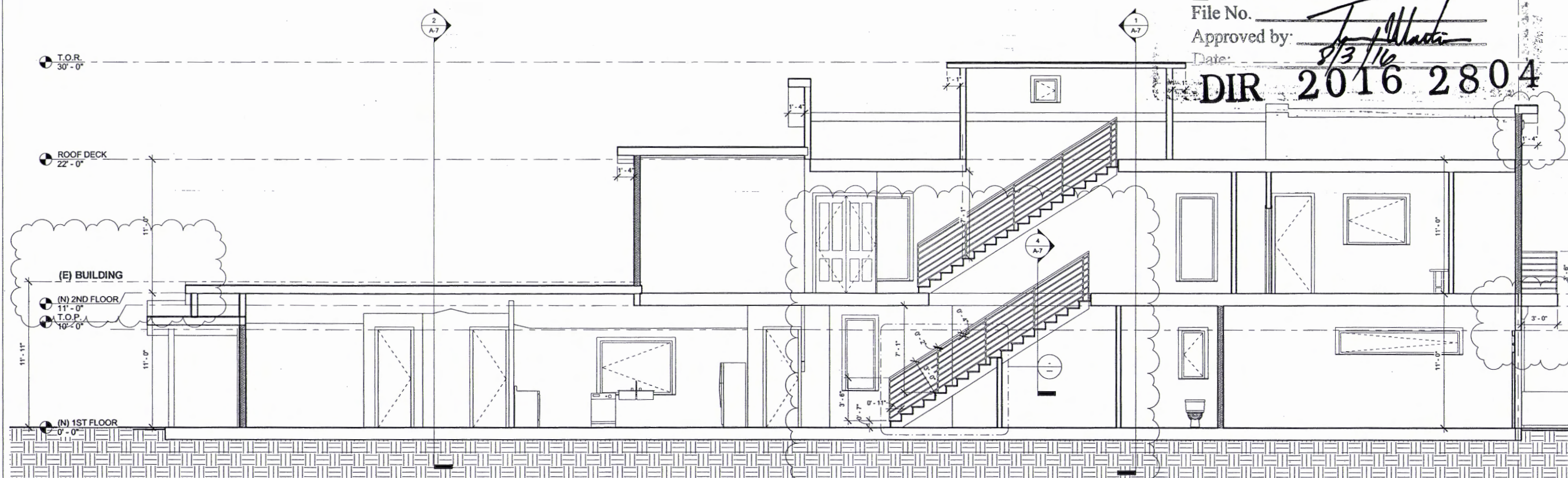
1 SECTION 1  
1/4" = 1'-0"



4 SECTION 4  
1/4" = 1'-0"



2 SECTION 3  
1/4" = 1'-0"



3 SECTION 2  
1/4" = 1'-0"

Los Angeles City Planning  
COASTAL ZONE PLAN APPROVAL  
APPROVAL IN CONCEPT

☒ Single Jurisdiction

☐ Dual Jurisdiction

File No. \_\_\_\_\_

Approved by: \_\_\_\_\_

Date: \_\_\_\_\_

DIR 2016 2804

PLANS PREPARED BY

**KOBE STRUCTURAL**  
ENGINEERING & DESIGN

19528 VENTURA BLVD #641 TARZANA, CA 91356 818-309-2921 KOBE@GMAIL.COM

OWNER'S INFO:

657 E FLOWER, LOS  
ANGELES, CA 90291

PROJECT DESCRIPTION:

NEW ADDITION

SHEET TITLE:

SECTIONS

DATE:

7/17/2016

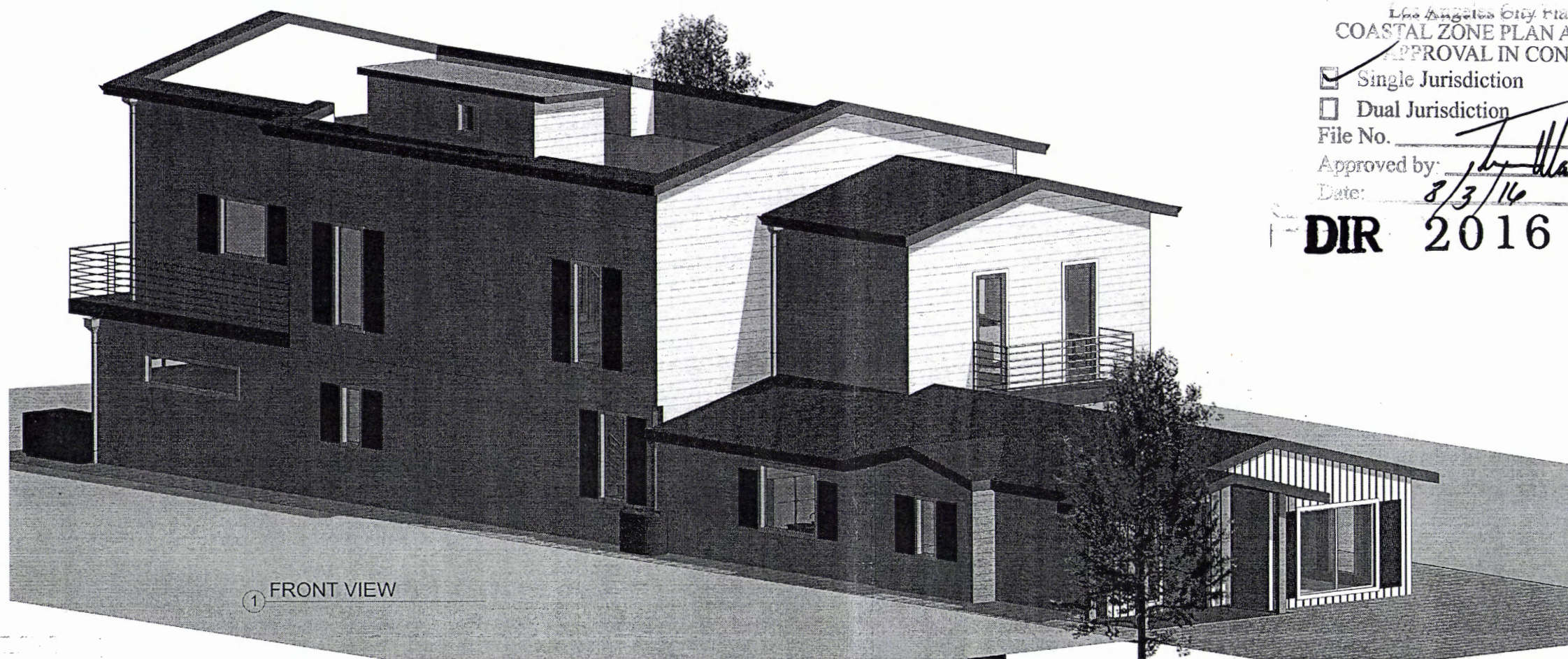
SCALE:

1/4" = 1'-0"

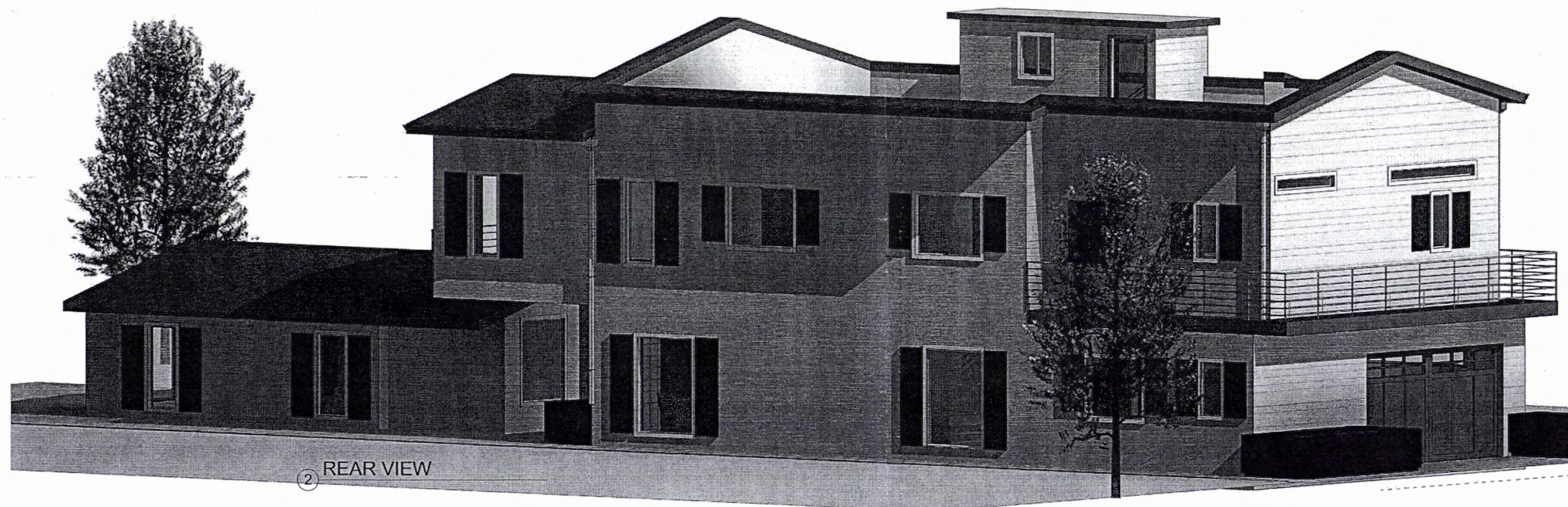
SHEET:

A-7

THIS DRAWING IS THE SOLE PROPERTY OF BY MARC AND IS INTENDED FOR USE ONLY FOR THE PROJECT LISTED IN THE TITLE BLOCK. THIS DOCUMENT AND CONTENTS MAY NOT BE REPRODUCED, CHANGED OR COPIED IN ANY FORM OR ASSURED TO ANY THIRD PARTY WITHOUT A WRITTEN PERMISSION OF BY MARC AND.



① FRONT VIEW



② REAR VIEW

Los Angeles City Planning  
COASTAL ZONE PLAN APPROVAL  
APPROVAL IN CONCEPT

☒ Single Jurisdiction

☐ Dual Jurisdiction

File No.

Approved by: *[Signature]*

Date: 8/3/16

**DIR 2016 2804**

PLANS PREPARED BY

**MARC**  
KOBESTRUCTURAL  
ENGINEERING & DESIGN

19528 VENTURA BLVD #641 TARZANA, CA 91356 818-309-2921 KOBEC@

OWNER'S INFO:

657 E FLOWER, Los  
Angeles, CA 90291

PROJECT DESCRIPTION:

NEW ADDITION

SHEET TITLE:

3D VIEWS

DATE:

7/17/2016

SCALE:

SHEET:

E-3



Los Angeles City Planning  
COASTAL ZONE PLAN APPROVAL  
APPROVAL IN CONCEPT

☒ Single Jurisdiction

☐ Dual Jurisdiction

File No.

Approved by:

Date:

*T. J. Martin*  
8/3/16

DIR 2016 2804

PLANS PREPARED BY

MARC

ENGINEERING:

KOBE STRUCTURAL  
ENGINEERING & DESIGN

19528 VENTURA BLVD #641 TARZANA, CA 91356 818-309-2921 KOBE@PI

OWNER'S INFO:

657 E FLOWER, Los Angeles, CA 90291

PROJECT DESCRIPTION:

NEW ADDITION

SHEET TITLE:

3D VIEWS

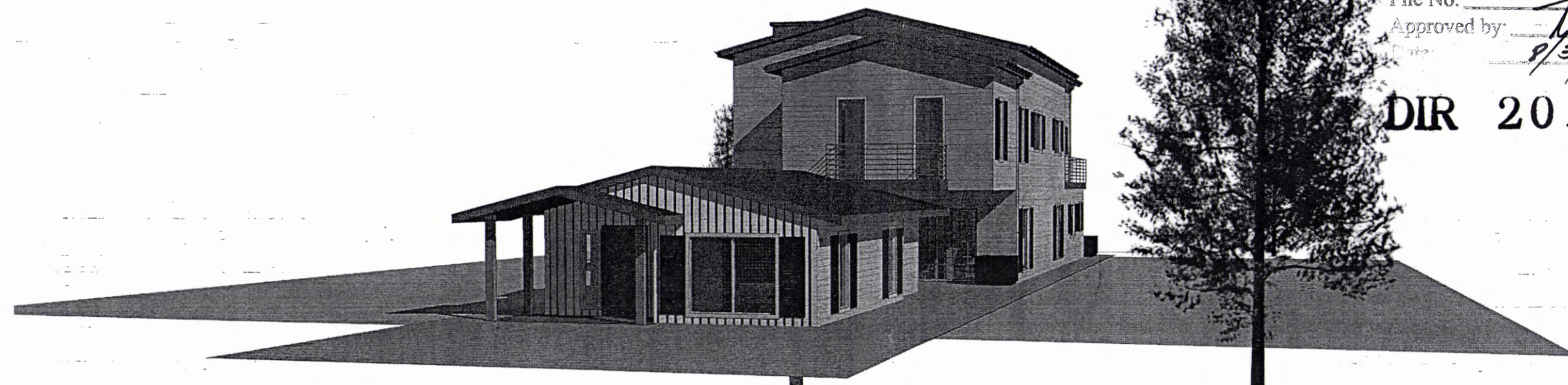
DATE:

7/17/2016

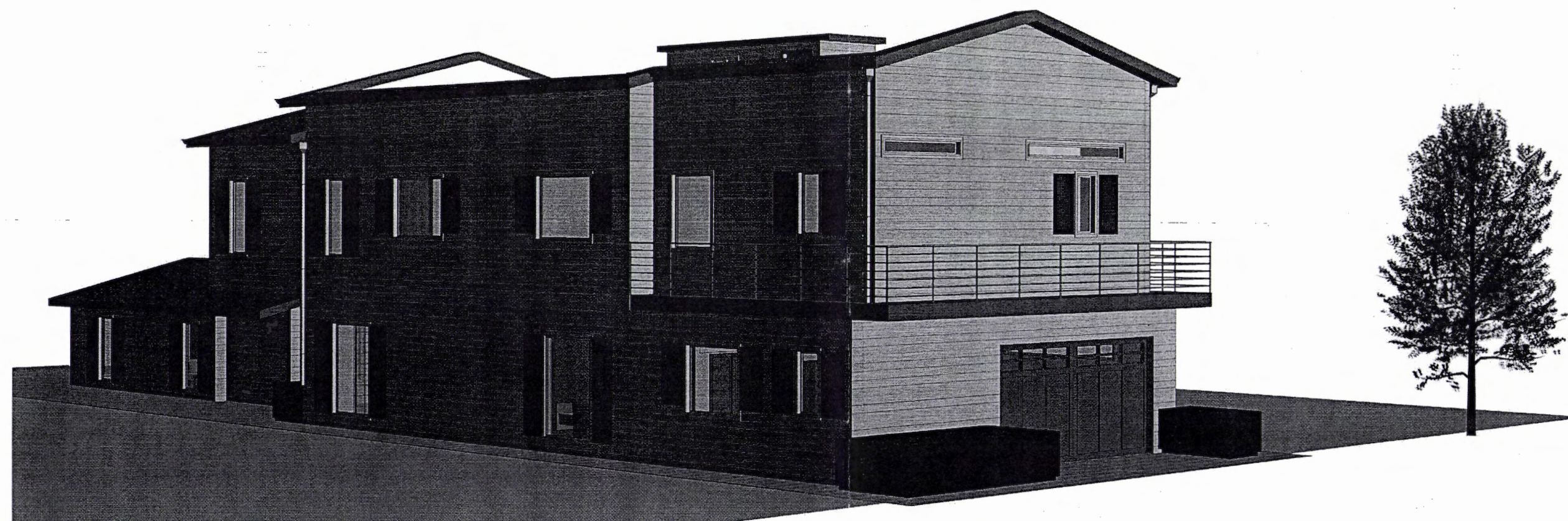
SCALE:

SHEET:

E-4



② FRONT



① REAR