

CALIFORNIA COASTAL COMMISSION

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**W16d**

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**STAFF REPORT:
 APPEAL – SUBSTANTIAL ISSUE & DE NOVO**

Appeal Number: A-5-VEN-21-0036

Applicant: Gregory and Annette Goldstein

Agent: Bill Tsui, Yu2e Inc.

Local Government: City of Los Angeles

Local Decision: Approval with Conditions

Appellants: Richard Stanger, Sue Kaplan on behalf of Citizens Preserving Venice, Ingrid Marston, and Warren Adler

Project Location: 610 Mildred Avenue, Venice, City of Los Angeles, Los Angeles County (APN No. 4228-004-042).

Project Description (On Appeal): Demolition of a one-story, 1,080 square-foot single-family dwelling with detached garage and construction of a new 2,834 square-foot, 28 feet high, two-story single-family dwelling with a detached 423 square-foot two-car garage with bathroom, plus one additional on-site parking space, swimming pool and a roof deck, on a 4,100 square-foot lot.

Project Description (De Novo): Demolition of a one-story, 1,080 square-foot single-family dwelling with detached garage and construction of a new 2,719 square-foot, 28 feet high, two-story single-family dwelling with a detached 363 square-foot two-car garage plus one additional on-site parking space, and swimming pool on a 4,100 square-foot lot.

Staff Recommendation: Substantial Issue on Appeal and Approval with
Conditions on De Novo

IMPORTANT NOTE: The Commission will not take testimony on this “substantial issue” recommendation unless at least three commissioners request it. The Commission may ask questions of the applicant, any aggrieved person, the Attorney General or the Executive Director prior to determining whether or not to take testimony regarding whether the appeal raises a substantial issue. (14 CCR § 13115(c).) If the Commission takes testimony regarding whether the appeal raises a substantial issue, testimony is generally and at the discretion of the Chair limited to 3 minutes total per side. Only the applicant, the appellant, persons who opposed the application before the local government, and the local government shall be qualified to testify during this phase of the hearing. Others may submit comments in writing. (14 CCR § 13117.) If the Commission finds that the appeal raises a substantial issue, the de novo phase of the hearing will occur directly following that finding, during which it will take public testimony.

PLEASE NOTE THAT THIS WILL BE A VIRTUAL MEETING. As a result of the COVID-19 emergency and the Governor’s Executive Orders N-29-20, N-33-20, and N-08-21, this Coastal Commission meeting will occur virtually through video and teleconference. Please see the Coastal Commission’s Virtual Hearing Procedures posted on the Coastal Commission’s webpage at www.coastal.ca.gov for details on the procedures of this hearing. If you would like to receive a paper copy of the Coastal Commission’s Virtual Hearing Procedures, please call 415-904-5202.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends that the Commission determine that a **substantial issue exists** with respect to the grounds on which the appeal has been filed for the following reason: the project, as approved by the City of Los Angeles, is inconsistent with the community character policies of the Venice Land Use Plan (LUP) and the Chapter 3 policies of the Coastal Act. Staff also recommends that, after a public hearing, the Commission **approve the de novo permit** as revised with special conditions.

The Venice LUP designates the project site and adjacent rows of lots as Single-Family Residential—Low per the Policy I.A.3 subarea map. This designation allows for the construction of one single-family structure per lot. The project site is currently developed with a single-family residence. The City-approved project will replace the existing residence with a new single-family residence.

The primary issue of the City-approved development is that the residence is inconsistent with Coastal Act Sections 30253(e) and 30251 that protect special communities and require permitted development be visually compatible with the character of surrounding areas. The City-approved residence is also inconsistent with LUP Policy I.E.2, which states, in part, “all new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods” and LUP Policy I.E.3, which states, in part, “varied styles of architecture are encouraged ...while maintaining the neighborhood scale and massing.” LUP Policies I.E.2 and I.E.3 are designed to protect Venice’s unique community character, a significant coastal resource. The City-approved development that fronts Mildred Avenue is approximately 44 feet long, and the east side of the proposed home that fronts Beach Avenue is approximately 19 feet wide, of which neither side offers a stepped back façade or other articulated features to reduce its massing, which is uncommon in the area, thereby creating a visual impact highly visible to pedestrians on the large corner lot.

Commission staff believes that there is a substantial issue with respect to the grounds on which the appeal was filed and the project’s consistency with Chapter 3 of the Coastal Act. Inconsistent with the LUP, the City’s findings lacked consideration of the visual impact that the project’s massing would have for pedestrians from this corner lot, which could prejudice their ability to prepare an LCP in the future. As described above, the City-approved development will have an adverse visual impact to the pedestrian scale of this area of Venice and raises an issue of statewide significance because impacts to coastal resources, including community character, are important statewide issues.

If the Commission finds that substantial issues exist relating to the community character protection policies of Chapter 3 of the Coastal Act and the LUP, the Commission’s de novo review should consider whether the proposed development is consistent with the Chapter 3 policies of the Coastal Act. The certified Venice Land Use Plan is advisory in nature and provides guidance.

Staff recommends that the Commission, after public hearing, determine that a **substantial issue exists** with respect to the City-approved project's conformity with the Chapter 3 policies of the Coastal Act.

After working with Commission staff, the applicant revised the project to include the following changes:

- Replacement of 254 square feet of second level habitable floor area with a 265 square foot deck to create a stepped back appearance from Mildred Avenue
- Modification of the roofline to reduce the roof height adjacent to Mildred Avenue from 28 feet to 23.5 feet and to remove the roof deck
- Addition of a new covered front porch and addition of 139 square feet of habitable floor area to the first level to create a stepped back appearance from Beach Avenue
- Expansion of the garage side yard setback along Mildred Avenue from zero feet to three feet and reduction of the garage height adjacent to Mildred Avenue from 18.5 feet to 12.5 feet.

These changes adequately address the scenic and visual resource policies of the Coastal Act and community character policies of the Venice LUP.

Staff recommends the Commission **approve the de novo permit** as revised with special conditions. Staff recommends ten special conditions including: 1) Submittal of Revised Final Plans; 2) Permit Compliance; 3) Local Government Approval; 4) LADBS Approval; 5) Construction Staging Plan; 6) Water Quality; 7) Landscaping; 8) Assumption of Risk; 9) Development Removal and 10) Deed Restriction.

The motion and resolution to adopt staff's recommendations are on Pages 6 and 18.

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EXHIBITS

[Exhibit 1 – Vicinity Map and Project Site](#)

[Exhibit 2 – Project Plans \(Appeal\)](#)

[Exhibit 3 – City of Los Angeles Director’s Determination Letter](#)

[Exhibit 4 – WLAAPC Determination Letter](#)

[Exhibit 5 – Appeal](#)

[Exhibit 6 – CCC Survey Area](#)

[Exhibit 7 – City Survey Area](#)

[Exhibit 8 – Project Plans \(De Novo\)](#)

I. MOTION AND RESOLUTION – SUBSTANTIAL ISSUE

Motion: I move that the Commission determine that Appeal No. A-5-VEN-21-0036 raises **NO SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act.

Staff recommends a NO vote. Following the staff recommendation on this motion will result in the Commission proceeding to conduct a de novo review of the application, and adoption of the following resolution and findings. Conversely, passage of this motion will result in a finding of No Substantial Issue, and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the appointed Commissioners present.

Resolution: The Commission hereby finds that Appeal No. A-5-VEN-21-0036 presents a **SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act regarding consistency with Chapter 3 policies of the Coastal Act.

II. APPELLANTS' CONTENTIONS

On May 26, 2021, within 20-working days of receipt of notice of final local decision, Richard Stanger, Sue Kaplan on behalf of Citizens Preserving Venice, Ingrid Marston, and Warren Adler filed an appeal of the local CDP, which included the following contentions:

1. The project is not in conformance with Chapter 3 of the California Coastal Act, specifically Sections 30250(a), 30251, 30253(e).
2. The project fails to meet the neighborhood protection policies of the 2001 Venice Land Use Plan by ignoring Policies I.A.2 (Preserve stable single-family neighborhoods), I.E.1 (General), I.E.2 (Scale), I.E.3 (Architecture). In particular, the mass and size of the home is too large and inconsistent with other homes in the neighborhood.
3. The project will prejudice the ability of the City of Los Angeles to prepare a local coastal program in conformity with Chapter 3 of the California Coastal Act.
4. The project will have a negative cumulative effect on the character and scale of its immediate neighbors and on the larger Silver Triangle neighborhood.
5. The analysis of the project in the Director's Determination is substantially flawed, misrepresenting the area, using prior irrelevant zoning decisions, selectively choosing policies in the Venice Land Use Plan, and ignoring relevant recent judicial rulings.

III. LOCAL GOVERNMENT ACTION

The City held a public hearing for the local CDP on October 5, 2020. The following three community members provided comments at the hearing: Robin Rudisill on behalf of Citizens Preserving Venice (opposed), Richard Stanger (opposed), Zabi Fazal (inquirer). Concerns raised during this hearing included that the project is inconsistent with the mass, scale, and character of the neighborhood, the project is three times the size of

other homes on the block, and that the project will result in cumulative impacts to the neighborhood and a cumulative impact analysis should be required for the project. After a four-week advisement period, six opposition e-mails were submitted echoing the same concerns at the public hearing. In addition, two e-mails in support of the project were submitted.

On January 7, 2021, the City of Los Angeles Director of Planning approved the project under Case No. DIR-2020-3520-CDP-MEL (Exhibit 3). The local CDP approved the demolition of a 1,080 square foot single-story single-family residence and detached¹ garage built in 1962 and the construction of a new two-story, approximately 28 feet high, 3,008 square foot² single-family residence with roof deck (no access structure), a 423 square foot detached two-car garage with bathroom, swimming pool, and one additional uncovered onsite parking space.

The Planning Director's approval was subsequently appealed to the West Los Angeles Area Planning Commission (WLAAPC) by Richard Stanger. At its meeting on April 7, 2021, the WLAAPC denied the appeal and sustained the Planning Director's January 7, 2021 Determination, thereby approving the local CDP and issuing a Determination Letter dated April 15, 2021 (Exhibit 4).

On May 3, 2021, the Commission received the City's Notice of Final Action (NOFA) for the project and opened the Commission's 20 working-day appeal period. On May 26, 2021, the above-mentioned appeal was received (Exhibit 5). No other appeals were received prior to the end of the Commission's appeal period on June 1, 2021.

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 CDPs. Sections 13301-13325 of Title 14 of the California Code of Regulations provide procedures for issuance and appeals of locally issued CDPs. Section 30602 of the Coastal Act allows any action by a local government on a CDP application evaluated under Section 30600(b) to be appealed to the Commission. The standard of review for such an appeal is the Chapter 3 policies of the Coastal Act. [Cal. Pub. Res. Code §§ 30200 and 30604.]

After a final local action on a City CDP application, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice which contains all the required information, a twenty working-day appeal period begins during which any

¹ Building records indicate that the garage was originally detached. However, according to the applicant, the existing garage is attached to the home due to an unpermitted addition under the prior owner.

² The City approved the project with 3,008 square feet. However, in past decisions, the Commission has used only the habitable space towards the size of the development. In this case, the City-approved home is 2,834 square feet and the additional 174 square feet consists of a covered porch.

person, including the applicants, the Executive Director, or any two members of the Commission, may appeal the City 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 comply with the procedures for filing an appeal as required under section 13111 of Title 14 of the California Code of Regulations, including the specific grounds for appeal and a summary of the significant question raised by the appeal.

The action currently before the Commission is to find whether there is a “substantial issue” or “no substantial issue” raised by the appeal of the local approval of the City-approved project. Sections 30621 and 30625(b)(1) of the Coastal Act, and Section 13321 of the Commission’s regulations, require a de novo hearing of the appealed project unless the Commission determines that no substantial issue exists as to the project’s conformity with Chapter 3 of the Coastal Act.

Commission staff recommends a finding of **substantial issue**. If the Commission decides that the appellants’ contentions raise no substantial issue as to conformity with Chapter 3 of the Coastal Act, the action of the local government becomes final. Alternatively, if the Commission finds that a substantial issue exists with respect to the conformity of the action of the local government with the Chapter 3 policies of the Coastal Act, the local CDP is voided and the Commission will hear the de novo matter and dual permit application immediately following the substantial issue finding, unless the Commission schedules the de novo portion of the hearing for a future date. [Cal. Pub. Res. Code §§ 30621 and 30625.] Section 13321 of the Coastal Commission regulations specifies that de novo actions will be heard according to the procedures outlined in Sections 13114 and 13057-13096 of the Commission’s regulations.

If there is no motion from the Commission to find no substantial issue, it will be presumed that the appeal raises a substantial issue, and the Commission will hold the de novo phase of the public hearing on the merits of the application, using the Chapter 3 policies of the Coastal Act. The Venice LUP, certified on June 14, 2001, is used as guidance. Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

If the Commission decides to hear arguments and vote on the substantial issue question, those who are qualified to testify at the hearing as provided by Section 13117 of Title 14 of the California Code of Regulation, will typically 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, appellants, persons who opposed 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 AREA

Within the areas specified in Section 30601, which is known in the City of Los Angeles permit program as the Dual Permit Jurisdiction area, the Coastal Act requires that any development which receives a local CDP also obtain a second (or “dual”) CDP from the Coastal Commission. For projects located inland of the areas identified in Section 30601 (i.e, projects in the Single Permit Jurisdiction), the City of Los Angeles local coastal development permit is the only CDP required. The subject project site on appeal herein is located within the Single Permit Jurisdiction Area. Therefore, the applicant is not required to obtain a second, or “dual”, CDP from the Commission for the City-approved development.

VI. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION AND LOCATION

The scope of work approved by the City includes the demolition of a one-story, 1,080 square foot single-family residence with a detached³ garage, and construction of a new two-story, approximately 28 feet high, 2,834 square foot single-family residence with a 423 square foot detached two-car garage with bathroom, roof top deck, swimming pool, and one additional on-site parking space (Exhibit 2). The three onsite parking spaces for the residence will be accessed through the rear alley on Ocean Court. The front yard setback (fronting Beach Avenue) will be 15 feet, the rear yard setback (fronting Ocean Court) will be 15 feet for the home and 0 to 12 feet for the garage, the side yard setback (adjacent to an existing neighboring home) will be approximately 5 feet, and the side yard setback (fronting Mildred Avenue) will be approximately 5 feet for the home and 3 feet for the detached garage. The City-approved project observes all setbacks, open space, and height requirements of both the City of Los Angeles uncertified Zoning Code and the certified Venice LUP.

The project site is a 4,100 square foot corner lot located approximately ½ mile inland of the beach in the Southeast Venice subarea at 610 Mildred Avenue (Exhibit 1). The lot, which is larger than most of the lots in the surrounding neighborhood, is designated as Single Family Residential (Low) by the Venice LUP and zoned R1-1-O by the Los Angeles Municipal Code. The Southeast Venice neighborhood and the subject block are characterized primarily by one-story and two-story single-family and multi-family homes of varying sizes and architectural styles.

B. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS

When determining whether an appeal raises a “substantial issue,” section 13115(c) of the Commission’s regulations provide that the Commission may consider factors, including but not limited to:

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;

³ Building records indicate that the garage was originally detached. However, according to the applicant, the existing garage is attached to the home due to an unpermitted addition under the prior owner.

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.

The Commission may, but need not, assign a particular weight to a factor.

Staff recommends that the Commission find that **a substantial issue exists** with respect to whether the local government action conforms to the provisions of Chapter 3 of the Coastal Act for the reasons set forth below.

C. SUBSTANTIAL ISSUE ANALYSIS

As stated in Section IV of this report, the grounds for an appeal of a CDP issued by the local government prior to certification of its LCP are the Chapter 3 policies of the Coastal Act. Any local government CDP issued prior to certification of its LCP may be appealed to the Commission. The Commission shall hear an appeal unless it determines that no substantial issue exists as to conformity with Chapter 3 policies of the Coastal Act.

The appellants contend that the City-approved project is inconsistent with Sections 30250, 30251, and 30253 of the Coastal Act because the mass and scale of the approved structure is not consistent with the character of the Southeast subarea of Venice.

Section 30250(a) of the Coastal Act states, in relevant part:

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

Section 30251 of the Coastal Act states:

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

Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Section 30253(e) of the Coastal Act states, in relevant part:

New development shall...

(e) where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Venice LUP Policy I. E.1 General, states

Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

Venice LUP Policy I. E.2 Scale, states.

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

Venice LUP Policy I. E.3 Architecture, states.

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

Venice LUP Policy I.A.2 states, in part:

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

Venice LUP Policy I.A.3 states, in part:

Such development shall comply with the density and development standards set forth in this LUP.

Southeast Venice and the Oxford Triangle

Use: Single-family dwelling / one unit per lot

Density: One unit per 5,000 square feet of lot area

Yards: Yards shall be required in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of

stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.

Height: Not to exceed 25 feet for buildings with flat roofs or 30 feet for buildings with a varied or stepped back roof line. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).

Section 30250 of the Coastal Act requires new development to “be located within, contiguous with, or in close proximity to, existing developed areas.” Sections 30251 and 30253 of the Coastal Act state that scenic areas and special communities shall be protected. These sections of the Coastal Act require permitted development to be visually compatible with the character of surrounding areas and require protection of communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses. The Venice community including the beach, the boardwalk, the canals, and the eclectic architectural styles of the neighborhoods – is one of the most popular visitor destinations in California. According to the Venice Chamber of Commerce, 15 million people visited Venice in 2015, drawn by the unique characteristics of the area.⁴ The Commission has previously found that Venice's unique social and architectural diversity should be protected as a Special Coastal Community.

When the Commission certified the Venice LUP in 2001, it considered the potential impacts that development could have on community character and adopted policies and specific residential building standards to ensure development was designed with pedestrian scale and compatibility with surrounding development.

Given the specific conditions surrounding the subject site and the diverse development pattern of Venice, it is appropriate to use the certified LUP policies as guidance in determining whether the project is consistent with sections 30250, 30251, and 30253 of the Coastal Act.

Community Character

When reviewing the project, the City conducted an analysis of the lots and architectural style of the structures fronting Beach Avenue between Mildred Avenue and Olive Avenue (Exhibit 7). The City characterized this area as containing one- and two-story single-family and multi-family residences. The City stated that the approved development would conform with the density, buffer/setback, yard, and height policies in the Venice LUP and, overall, would be visually compatible with the area based on the conducted analysis. In addition, the City found that the project as approved would be consistent with the Chapter 3 policies of the Coastal Act.

The appellants primarily contend that the City's visual compatibility findings rely on ministerial development standards (e.g. density, setback and height) and not the LUP policies (I.A.2, I.E.1, I.E.2, and I.E.3) designed to protect community character of the area. More specifically, the appellants contend that the City-approved development does not conform to the mass, scale, and character of the

⁴ Venice Chamber of Commerce website. <<http://venicechamber.net/visitors/about-venice/>>

streetscape. The appellants contend that the project is three times larger than the average house size along Beach Avenue and 70% larger than the current largest home on the block. The appellants also assert that, beyond the subject block, the City-approved home is far larger than any of the two-story homes in its vicinity regardless of zoning classification.

Staff reviewed the City-approved project plans and the 54 structures along both sides of Beach Avenue between Mildred and Olive Avenue as well as along both sides of McKinley Avenue between Mildred Avenue and Holly Court (Exhibit 6). The subject site is a 4,100 square foot corner lot with frontage on both Mildred and Beach Avenues. The City-approved development would maintain density of one single-family home, consistent with the LUP and surrounding area, which is primarily single-family homes. Although the LUP does not provide setback standards for this area, the existing front yard setback along Beach Avenue at the subject site is approximately 30 feet, and the City-approved proposed front yard setback is approximately 19 feet. The prevailing front yard setback along Beach Avenue is approximately 4 feet 5-inches. Although the City-approved project would have a smaller front yard setback than what currently exists at the site, the setback would remain greater than the prevailing front yard setbacks that currently exist along this portion of Beach Avenue. The home proposes approximately 5 feet side yard setbacks along Mildred Avenue and the adjacent neighboring lot and a 15 feet rear yard setback along Ocean Court. The applicant has indicated that side yard setbacks along the subject block typically vary from 3 to 4 feet. The existing home has a 5-foot side yard setback along Mildred Avenue and a 4-foot side yard setback near the adjacent neighboring lot. The detached garage has a side yard setback of zero feet along Mildred Avenue.

The City-approved two-story residence is designed without a rooftop roof access structure and would have a varying height of 23 feet 6 inches along the north, west and south roof perimeter (approximately 75% of the roofline), which would rise to a maximum building height of approximately 28 feet at the portion of the structure fronting the corner of Beach Avenue and Mildred Avenue. The varied height of the City-approved structure is consistent with the development standards of the Venice LUP, which stipulate a maximum height of 25 feet for structures with flat roofs and 30 feet for structures with varied roofs in this area.

Surveyed Area – Average Lot Size

The average lot size of all the lots located along the surveyed portion of Beach Avenue and McKinley Avenue is 3,445 square feet. There are four other lots in the survey area that are greater than 4,000 square feet.

Surveyed Area – Units per Lot

There are forty-eight single-family homes and six multi-family structures.

Surveyed Area – Number of Stories

There is one three-story structure, twenty-three two-story structures and thirty one-story structures.

Surveyed Area – Home Size

The average square footage of the structures fronting Beach Avenue and McKinley Avenue is 1,537 square feet. The City-approved project would exceed that average by 1,297 square feet and is approximately 816 square feet larger than the largest home on Beach Avenue. Additionally, there are six homes larger than the City-approved project⁵ of which three are also two-stories.⁶

Surveyed Area – Articulation

Fifteen of the twenty-three two-story homes have stepped back facades or second story additions toward the rear of the lots.

Venice LUP Policy I.E.2 states, in part, that “all new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods.” Additionally, LUP Policy I. E.3 states, in part, that, “varied styles of architecture are encouraged...while maintaining the neighborhood scale and massing.” These policies encourage a variety of styles and discourage focus on subjective judgments about what architectural style is preferred. Hence, the Commission has used height limits, setback requirements and bulk to analyze the mass and scale of City-approved structures to determine compatibility with the character with the surrounding area.

In addition, the Venice LUP recognizes the importance of the existing pedestrian scale single-family residential neighborhoods and the need to conserve them. Therefore, new structures should be sited and articulated to respect a pedestrian scale while also maintaining visually compatibility with surrounding neighborhood. Though the City considered the massing to be compatible with other homes in the surrounding area, the massing comparison did not take into consideration that the approved development is located on a large corner lot that would be highly visible to pedestrians along both Mildred and Beach Avenues whereas the massing of homes in the middle of a block would be more hidden.

More so, fifteen of the twenty-three two-story homes in the surveyed area have stepped back facades or second-story additions toward the rear of the lots, while in this case, the structure lacks articulation and is not stepped back from either Beach or Mildred Avenues. In fact, the portion of the home that rises to the maximum height of approximately 28 feet is at the most visible portion of the structure, at the corner of Beach and Mildred Avenues. Taking into consideration the combination of the visibility of the larger corner lot and the bulky frontage of 44 feet along Mildred Avenue and approximately 19 feet along Beach Avenue, the home would appear to

⁵ 2321 McKinley Avenue with 2,871 square feet, 2337 McKinley Avenue with 2,918 square feet, 2338 McKinley Avenue with 2,750 square feet, 2325 McKinley Avenue with 2,784 square feet, 592 Olive Avenue with 2,786 square feet, and 2416 McKinley Avenue with 4,779 square feet.

⁶ 2321 McKinley Avenue with 2,871 square feet, 2337 McKinley Avenue with 2,918 square feet and 2416 McKinley Avenue with 4,779 square feet.

be very large compared to other homes in the neighborhood and is, thus, inconsistent with the character of the surrounding development in this regard.

While the City did provide some analysis regarding the character and scale of the approved home within the existing neighborhood, the City was remiss in failing to factor in the home's visual impact given that it is situated on a corner lot. The lack of articulation, if implemented on future projects, has the potential to adversely impact community character. Therefore, the appellants' contention that the mass of the home is out of character of the area does raise a substantial issue with the project's conformity with the Chapter 3 policies of the Coastal Act and Venice LUP Policies I.E.2 and I.E.3.

Cumulative Effects

Section 30105.5 of the Coastal Act states:

"Cumulatively" or "cumulative effect" means the incremental effects of an individual project shall be reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The City did not conduct a cumulative effects analysis. Thus, to evaluate the appellants' contention regarding the potential cumulative impacts of the City-approved residence, staff assessed the development on community character, mass, and scale in connection with past, current, and probable future projects. To ensure the cumulative effects analysis was not skewed by comparison of past projects, the survey of residences in the subject area was categorized into three tables representing past redevelopment projects (Tables 1 and 2) and current housing stock (Table 3); these tables were then analyzed as separate data sets, as found in Appendix B of the staff report.

The cumulative effects analysis included all fifty-four structures in the survey area and considered the year of Commission or City approval for redevelopment, lot size, habitable residence area, and height. For properties which have not received Commission or City approval for redevelopment since 2001, the survey considered the year of residence construction, lot size, and current habitable residence area. Height is not included on the mapping tool used to obtain this information, ZIMAS, and thus wasn't included for the properties that have not redeveloped after 2001.

The information analyzed by Commission staff shows that the City-approved residence has a height and size consistent with past Commission and City actions on similar residences since 2001.⁷ Table 3 also demonstrates the subject residence is larger than the majority of homes that have not been redeveloped subsequent to 2001 within the survey area. Commission staff is not aware of future development projects in the survey area.

The Venice LUP anticipates that homes in Venice will be replaced over time and that larger homes can be built, as long as the LUP policies regarding height, roof access

⁷ Such actions include the following homes: 2345 Beach Avenue, 2321 McKinley Avenue, 2325 McKinley Avenue, 2338 McKinley Avenue, and 2416 McKinley Avenue.

structures, lot consolidations, and community character are observed. The Commission has found that the appeal raises a substantial issue as to the Project's consistency with Chapter 3 policies relating to community character in Venice and will address the potential cumulative effects to community character, applying the Venice LUP standards as guidance, in its *de novo* review of the Project.

Prejudice to City's Preparation of an LCP that Conforms to Chapter 3

The Venice LUP was certified by the Coastal Commission on June 14, 2001, but implementing ordinances have not been adopted. The City is currently working to adopt an updated LUP for Venice and Implementation Plan and subsequently obtain a fully certified LCP. Under Section 30604(a) of the Coastal Act, a local government's approval of a CDP must include findings that the project conforms with Chapter 3 of the Coastal Act and that the "permitted development will not prejudice the ability of the local government to prepare a local coastal program that is in conformity with Chapter 3."

While the City provided a community character analysis, that analysis failed to fully consider the bulk and massing of the proposed structure in the context of the neighborhood. In this case, given the highly visible corner lot location of the site, the City's analysis should have considered the stepped back facades and articulation of other two-story homes in the survey area, as these features serve to reduce the massing of the homes in a manner that is compatible with the neighborhood and consistent with Sections 30251 (protection of scenic and visual quality) and 30253 (protection of community character) of the Coastal Act and LUP Policies I.E.2 (scale) and I.E.3 (architecture). Therefore, the City's inadequate community character analysis could prejudice their ability to prepare an LCP in the future and does raise a substantial issue.

Additional Contentions

The appellants additionally contend that the City's findings regarding consistency with community character contained factual flaws and relied on inappropriate evidence.

As to appellants' specific assertions, appellants are not correct that the City mistakenly stated there were multi-family dwellings on both Beach Avenue and Mildred Avenue. Commission staff identified four multi-family structures on Beach Avenue and three multi-family structures on Mildred Avenue. Thus, the City was correct in that statement, and this assertion does not raise a substantial issue.

The City's analysis provided six examples of recent planning cases to guide the decision on the local CDP. The appellants contend that some of the examples are not relevant to the subject project because they do not account for recent court decisions related to some of the selected examples. There are legal actions at various stages with regard to redevelopment of homes in Venice, however, it is not clear at this point exactly how the cases will guide future development in Venice.

The appellants also contend that some of the example sites are located too far from the subject site. Of the six example projects, two (3021 and 3024 Stanford Avenue) are located a mile away from the subject site. The significant distance between the subject site and these two example sites does raise questions regarding their usefulness in evaluating the subject project.

Lastly, the appellants contend that the City arbitrarily excluded relevant policies in the Regional Interpretive Guidelines. The Regional Interpretive Guidelines are not the standard of review.

SUBSTANTIAL ISSUE FACTORS

The Commission's standard of review for determining whether to hear the appeal is whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code §30625(b)(1); 14 C.C.R. § 13321. The Commission's decision will be guided by the factors listed in the previous section of this report.

The first factor is the **degree of factual and legal support for the local government's decision** that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. While the City found that the project would be consistent with the community character of the area and with Sections 30250, 30251, and 30253 of the Coastal Act, the City's community character analysis did not have adequate support for such a determination. The City's analysis did not include enough information regarding the size, mass, and year of redevelopment of nearby development. Staff believes that the project, as approved by the City, is not consistent with LUP Policies I.E.2 and I.E.3; thus, as approved by the City, the project would prejudice the City's ability to prepare an LCP that conforms with Chapter 3 of the Coastal Act. Therefore, the Commission finds that the City did not provide an adequate degree of factual and legal support for its decision, and this factor supports a finding of substantial issue.

The second factor is the **extent and scope of the development** as approved or denied by the local government. The City-approved development will demolish a single-family residence and replace it with a new single-family residence in a highly developed area. The scope is consistent with that of the surrounding development, which is comprised primarily of one-story and two-story single- and multi-family residences. Therefore, the Commission finds that the extent and scope of the City-approved development is consistent with the Chapter 3 policies of the Coastal Act, so this factor weighs against a finding of substantial issue.

The third factor is the **significance of the coastal resources affected** by the decision. Venice's unique community character is a significant coastal resource. As described above, the City-approved development will have an adverse visual impact to the pedestrian scale of this area of Venice. Therefore, the Commission finds that the City-approved development will have a significant impact on coastal resources, inconsistent with Sections 30250, 30251, and 30253, and this factor supports a finding of 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 LUP. The Commission relies on the certified LUP for Venice as guidance when reviewing appeals and approving projects because the LUP was certified by the Commission as consistent with Chapter 3 of the Coastal Act. The City-approved development is inconsistent with the scenic and visual quality and community character protection policies of the Coastal Act and LUP Policies I.E.2 and I.E.3. Therefore, the Commission finds that the City-approved development will have a significant adverse impact on future interpretations of its LUP, and this factor supports a finding of substantial issue.

The final factor is **whether the appeal raises local issues, or those of regional or statewide significance**. Venice has been identified as a Special Coastal Community and is a visitor destination for those from around the state, nation, and world; and, as such, is a coastal resource beyond the local community. The City-approved development is inconsistent with the Chapter 3 policies of the Coastal Act that are intended to protect such resources. Therefore, the Commission finds that the City-approved CDP does raise issues of statewide significance, and this factor supports a finding of substantial issue.

Conclusion

Applying the five factors listed above clarifies that, on balance, the appeal raises a “substantial issue” with respect to the project’s consistency with Chapter 3 of the Coastal Act and the certified Venice LUP with respect to compatibility with community character. The decision is likely to set an adverse precedent for future interpretations of the Venice LUP and prejudice the City’s ability to prepare an LCP in the future. Therefore, staff recommends that the Commission find that the appeal raises a substantial issue as to the project’s conformity with the Chapter 3 policies of the Coastal Act.

VI. MOTION AND RESOLUTION – DE NOVO

Motion: I move that the Commission **approve** Coastal Development Permit Application No. A-5-VEN-21-0036 pursuant to the staff recommendation.

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

Resolution: The Commission hereby approves Coastal Development Permit Application No. A-5-VEN-21-0036 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that will substantially lessen any significant adverse impacts of the development on the environment.

VII. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

VII. SPECIAL CONDITIONS

1. **Submittal of Revised Final Plans.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant(s) shall submit, in a form and content acceptable to the Executive Director, two (2) full-sized sets of final revised project plans for the proposed development. The final plans shall be in substantial conformance with the conceptual plans submitted on October 18, 2021 by Yu2e Architects and shall be subject to the review and written approval of the Executive Director, and shall comply with the following:
 - A. A three-foot minimum garage setback along Mildred Avenue and a maximum garage height of 12 feet and 6 inches.
 - B. A new covered porch with a minimum ground-floor setback of 15 feet from Beach Avenue and a minimum second-story setback of 20 feet.
 - C. Variation to the roofline with new gable roof design, removal of the rooftop deck and a maximum height of 28 feet towards the interior portion of the lot.
 - D. Replacement of approximately 254 square feet of habitable floor area on the second level with an open space deck, addition of approximately 139 square feet of habitable floor area to the first level and an approximate reduction of habitable floor area from 2,834 square feet to 2,719 square feet.

The permittee shall undertake the development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Coastal Commission approved amendment to this coastal development permit amendment unless the Executive Director determines that no additional amendment is legally required.

- 2. Permit Compliance.** The permittee shall undertake and maintain the development in conformance with the special conditions of the permit and the final plans, including but not limited to the plans for the residence. Any proposed changes to the approved plans shall be reported to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations. No changes to the approved plans shall occur without a Commission-approved permit amendment unless the Executive Director determines that no permit amendment is required.
- 3. Local Government Approval.** The proposed development is subject to the review and approval of the City of Los Angeles (City). This action has no effect on conditions imposed by the City pursuant to an authority other than the Coastal Act. In the event of conflict between the terms and conditions imposed by the City and those of this coastal development permit, the terms and conditions of Coastal Development Permit A-5-VEN-21-0036 shall prevail.
- 4. City of Los Angeles, Department of Building and Safety Approval.** PRIOR TO ISSUANCE OF COASTAL DEVELOPMENT PERMIT, or within such additional time as the Executive Director may grant in writing for good cause, the applicant shall provide to the Executive Director a copy of a permit issued or evidence of preliminary approval by the City of Los Angeles, Department of Building and Safety (LADBS). The applicant shall inform the Executive Director of any changes to the project required by LADBS. Such changes shall not be incorporated into the project until the applicant obtains an amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.
- 5. Construction Staging Plan.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the written review and approval of the Executive Director, two copies of a construction staging plan. The construction staging plan shall incorporate the following:
 - A. The plan shall specify where construction equipment is proposed to be stored during construction in order to control erosion and maintain public access along Mildred and Beach Avenues.
 - B. All construction equipment to be stored overnight shall be stored on-site, outside the street travel-way and on-street parking areas.
 - C. Placement of the on-site dumpster shall incorporate use of a flagman to direct traffic during placement.

D. The plan shall also identify a disposal site outside of the Coastal Zone for waste materials and recyclable materials.

6. Water Quality.

A. Construction Responsibilities and Debris Removal

- 1) No demolition or construction materials, equipment, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain or tidal erosion and dispersion;
- 2) No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers;
- 3) Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24 hours of completion of the project;
- 4) Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters;
- 5) All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day;
- 6) The applicant(s) shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction;
- 7) Debris shall be disposed of at a legal disposal site or recycled at a recycling facility. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required;
- 8) All stock piles and construction materials shall be covered, enclosed on all sides, shall be located as far away as possible from drain inlets and any waterway, and shall not be stored in contact with the soil;
- 9) Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems;
- 10) The discharge of any hazardous materials into any receiving waters shall be prohibited;
- 11) Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any

spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible;

- 12) Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity;
- 13) All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

B. Drainage and Water Quality

- 1) During construction of the proposed project, no runoff, site drainage or dewatering shall be directed from the site into any canal or street that drains into a canal, unless specifically authorized by the California Regional Water Quality Control Board;
- 2) All equipment and materials shall be stored and managed in a manner to minimize the potential of pollutants to enter the canals;
- 3) A French drain, underground cistern, or other similar drainage systems that collect and reduce the amount of runoff that leaves the site shall be installed and maintained on the project site;
- 4) All runoff leaving the site shall be directed away from the canals and into the City storm drain system;
- 5) No water from any pool or spa shall be discharged into any canal or street that drains into a canal.

7. Landscaping: Drought-Tolerant, Non-Invasive Plants. Vegetated landscaped areas shall consist only of native plants and/or non-native drought-tolerant plants, which are non-invasive. No plant species listed as problematic and/or invasive by the California Native Plant Society (<http://www.CNPS.org/>), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (<http://www.cal-ipc.org/>), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a “noxious weed” by the State of California or the U.S. Federal Government shall be utilized within the property. All plants shall be low water use plants as identified by the California Department of Water Resources (See: <http://ucanr.edu/sites/WUCOLS/files/183488.pdf>).

8. Assumption of Risk, Waiver of Liability and Indemnity. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards, including but not limited to waves, storms, flooding, erosion, and earth movement, many of which will worsen with future sea level rise; (ii) to assume the

risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards; (v) that sea level rise could render it difficult or impossible to provide services to the site (e.g., maintenance of roadways, utilities, sewage or water systems), thereby constraining allowed uses of the site or rendering it uninhabitable; (vi) that the boundary between public land (tidelands) and private land may shift with rising seas, the structure may eventually be located on public trust lands, and the development approval does not permit encroachment onto public trust land; (vii) any future encroachment must be removed unless the Coastal Commission determines that the encroachment is legally permissible pursuant to the Coastal Act and authorizes it to remain, and any future encroachment would also be subject to the State Lands Commission's (or other trustee agency's) leasing approval; and (viii) that the structure may be required to be removed or relocated and the site restored if it becomes unsafe or if removal is required pursuant to the Coastal Act.

- 9. Development Removal.** By acceptance of this permit, the permittee agrees, on behalf of itself and all successors and assigns, that the landowner shall remove the development authorized by this permit including, but not limited to, the residence, including the pool, and any other improvements if: (1) the City or any other government agency with legal jurisdiction has issued a final order, not overturned through any appeal or writ proceedings, determining that the structures are currently and permanently unsafe for occupancy or use due to damage or destruction from waves, flooding, erosion, bluff retreat, landslides, or other hazards related to coastal processes, and that there are no feasible measures that could make the structures suitable for habitation or use without the use of bluff or shoreline protective devices; (2) essential services to the site (e.g., utilities, roads) can no longer feasibly be maintained due to the coastal hazards listed above; (3) removal is required pursuant to LCP policies for sea level rise adaptation planning; or (4) the development requires new and/or augmented shoreline protective devices that conflict with relevant LCP or Coastal Act policies. The permittee shall obtain a coastal development permit for removal of approved development unless the Executive Director provides a written determination that no coastal development permit is legally required. In addition, this permit does not permit encroachment onto public trust lands and any future encroachment onto public trust lands must be removed unless the Coastal Commission determines that the encroachment is legally permissible pursuant to the Coastal Act and authorizes it to remain. Any future encroachment would also be subject to the State Lands Commission's (or other trustee agency's) leasing approval.

- 10. Deed Restriction.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval

documentation demonstrating that the landowner has executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

VIII. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION AND LOCATION

Demolition of a one-story, 1,080 square foot single-family residence with a detached⁸ garage, and construction of a new two-story, approximately 28 feet high, 2,719 square foot single-family residence with a 363 square foot detached two-car garage, swimming pool, and one additional on-site parking space (Exhibit 8). The three onsite parking spaces for the residence will be accessed through the rear alley on Ocean Court. The front yard setback (fronting Beach Avenue) will be 15 feet, the rear yard setback (fronting Ocean Court) will be 15 feet for the home and 0 to 12 feet for the garage, the side yard setback (adjacent to an existing neighboring home) will be approximately 5 feet, and the side yard setback (fronting Mildred Avenue) will be approximately 5 feet for the home and 3 feet for the detached garage. The proposed project observes all setbacks, open space, and height requirements of both the City of Los Angeles uncertified Zoning Code and the certified Venice LUP.

The project site is a 4,100 square foot corner lot located approximately ½ mile inland of the beach in the Southeast Venice subarea at 610 Mildred Avenue (Exhibit 1). The lot is designated as Single Family Residential (Low) by the Venice LUP and zoned R1-1-O by the Los Angeles Municipal Code. The Southeast Venice neighborhood and the subject block are characterized primarily by one-story and two-story single-family and multi-family homes of varying sizes and architectural styles.

B. DEVELOPMENT

The Commission's standard of review for the proposed development is Chapter 3 of the Coastal Act. The City of Los Angeles LUP for Venice provides guidance. The findings set forth in the Substantial Issue discussion above are incorporated herein.

⁸ Building records indicate that the garage was originally detached. However, according to the applicant, the existing garage is attached to the home due to an unpermitted addition under the prior owner.

Relevant Coastal Act and certified Venice LUP policies are hereby incorporated from Section VI.C of the Substantial Issue portion of this staff report on pages 10 through 12.

Section 30250 of the Coastal Act requires concentration of development in existing developed areas able to accommodate it. This reduces vehicle miles traveled (required by Section 30253(d)), preserves open spaces that might otherwise be developed, provides more opportunities for people to live near the places where they work and recreate, and, thereby, reduces impacts to coastal resources. The Venice LUP contains building restrictions and density limits specific to individual areas and subareas of Venice, designed to protect community character and minimize impacts to coastal resources. The Venice LUP designates the project site and adjacent rows of lots as Single-Family Residential—Low per the Policy I.A.3 subarea map. This designation allows for the construction of one single-family structure per lot. The project site is currently developed with a single-family residence. The proposed project will replace the existing residence with a new single-family residence. As proposed and conditioned, the development concentrates new development in an already developed area, maintains the existing housing density on-site, and conforms with Section 30250(a) of the Coastal Act.

Sections 30251 and 30253(e) of the Coastal Act state that special communities shall be protected and require permitted development to be visually compatible with the character of surrounding areas. These sections also require protection of communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses. The Commission has previously found that Venice's unique social and architectural diversity should be protected as a Special Coastal Community. The Venice LUP also sets forth policies to preserve the community character, scale, and architectural diversity of each subarea within the Special Coastal Community. After a review of the project and the pattern of development in this area of Venice, the Commission finds that, as revised, the proposed development is consistent with the character of the Southeast subarea as well as the LUP building standards and will not have significant adverse impacts, either individually or cumulatively, on community character, mass, or scale in this neighborhood.

Community Character

Building height and bulk can affect the scenic and visual qualities of coastal areas. In prior actions, the Commission and the City have both consistently limited the height of structures to preserve the character of the Venice area.

For this area, the certified Venice LUP specifies that the maximum height of any structure is 25 feet for buildings with flat roofs or 30 feet for buildings with a varied or stepped back roof line.

As previously proposed, the maximum height (28 feet) of the structure was located in the most publicly visible location of the site - the corner of Beach and Mildred Avenues. The applicant revised the project to remove the roof deck and now proposes the height of the structure at this intersection to reach approximately 23.5 feet (Exhibit 8). From

that intersection along both Beach and Mildred Avenues, the height of the structure would vary but reach a maximum of approximately 26 feet. The highest peak is proposed to reach 28 feet and is sited in the interior of the lot approximately 22 feet inward from Mildred Avenue and 65 feet inward from Beach Avenue. The varied height and roofline of the revised structure reduces massing in a manner consistent with the specifications of the certified LUP which will maintain the visual quality of the area when viewed from the street and resembles gable ends that are similar to the prevailing roof forms in the neighborhood.

In addition, the applicant reduced the height of the detached garage from approximately 18 feet to 12 feet and removed the pool bath attached to the garage in order to increase the garage setback along Mildred Avenue from zero feet to three feet. These changes reduce the visual impacts of the development along Mildred Avenue.

Venice LUP Policy I. E. 2 requires new development to respect both the scale and character of the community development. Policy I. E. 3 encourages varied styles of architecture while maintaining the neighborhood scale and massing. A review of the homes in staff's survey area (Exhibit 6) reveals that fifteen of the twenty-three two-story homes have stepped-back facades or second-story additions toward the rear of the lots. Staff found the originally proposed residence to be inconsistent with the character of the area in this regard, and specifically found that it lacked articulation and a stepped back facade along both Beach and Mildred Avenues.

As previously proposed, the home had two-stories of unarticulated frontage spanning forty-four-feet wide along Mildred Avenue. As revised by the applicant, the second floor of the residence now proposes a thirty-one-foot-wide portion that steadily pushes away from Mildred Avenue to a total distance of twenty-two feet. To do this, the applicant reduced the habitable floor area on the second floor and reconfigured it as a 265 square foot deck (Exhibit 8) with an open trellis which reduces visual impacts along Mildred Avenue.

Previously, the home was set back approximately 19 to 21 feet from Beach Avenue but had little articulation. The prevailing setback along Beach Avenue is 4 feet 5-inches. The revised proposal now includes an enclosed front porch that is setback 15 feet from Beach Avenue. The second floor is set back five feet from the first floor and 20 feet from Beach Avenue. As revised by the applicant, the proposed structure breaks up the massing and is consistent with other homes in the area (Exhibit 8).

Furthermore, staff found that the structures in the survey area are primarily one and two-story single-family homes. The size of homes in the survey area ranges from 600 square feet to 4,779 square feet with an average of 1,537 square feet. The applicant reduced the size of the proposed two-story single-family home from 2,834 square feet to 2,719 square feet, which is within the range of homes in the area.

Cumulative Effects

The cumulative effects section is hereby incorporated by reference from Section VI.C of the Substantial Issue portion of this staff report on page 15.

Staff collected housing data from the City's ZIMAS zoning and permit tracking website and used the L.A. Department of Building and Safety records portal to fill in gaps when housing data was not available in ZIMAS. Additionally, staff used the L.A. County Assessor portal to compare home sizes to the information found on the City's ZIMAS zoning and permit tracking website. Staff added the County Assessor data in the neighborhood survey tables as a reference. There are discrepancies between the Los Angeles County Assessor data and the City of Los Angeles data, potentially due to differences in calculating square footage or a lack of home changes being reported. The home size discrepancies do not change staff's finding that the proposed project would not have an adverse cumulative effect on the surrounding area. Furthermore, a review of the City and Commission actions indicate that ten of the larger⁹ redeveloped homes were approved shortly after certification of the LUP. Since 2007, there has been no Commission action and in 2016, the City approved two smaller redevelopment projects. Additionally, staff is unaware of future projects within the subject area.

The proposed development is two stories. In this case, a two-story home is not out of character with the area as there are twenty-three residences that are two or more stories (approximately 45 percent), and thirteen of them were built prior to 2001, when the Venice LUP was certified. Therefore, staff's review of the surrounding development indicates that the proposed residence is consistent with the number of stories of homes in the area and would not set a precedent in this regard. Furthermore, the revised home would preserve the character of other two-story homes in the area by proposing a stepped back second story both on Beach and Mildred Avenues.

Furthermore, the Venice LUP anticipated that homes in Venice would be replaced over time and that larger homes could be built, as long as the LUP policies on height, setbacks, and community character are observed. Here, as discussed above, all of the building standards of the Venice LUP have been satisfied, and the proposed residence is not incompatible with the character of the smaller-sized homes that once predominated in this neighborhood and in Venice. Rather, a mix of home sizes and architectural styles is compatible with Venice's eclectic character.

In summary, the revised project, as conditioned, is unlikely to contribute to any cumulative effect on community character, mass and scale, and visual resources of the surrounding area in combination with past and potential future Commission actions. Thus, the project conforms with sections 30250, 30251 and 30253(e) of the Coastal Act.

Conclusion

The revised project conforms with the development standards in the Venice LUP and is compatible with the mass and scale of the structures within the survey area. **Special Condition 2** requires that development be undertaken in accordance with the approved final plans. In addition, **Special Conditions 3 and 4** require the applicant to obtain preliminary review and approval of the revised plans by the

⁹ Greater than 2,000 square feet.

LADBS to address any non-coastal resource related concerns with the revised plans and require the applicant to comply with local government requirements. To ensure that all development authorized pursuant to this permit complies with community character and visual resource policies of the Coastal Act, and because the plans have been revised since the City-approved development was appealed, the Commission imposes **Special Condition 1** requiring that the final revised plans be submitted for review and approval of the Executive Director. Therefore, the Commission finds that the revised project, as conditioned, is consistent with the applicable policies of the certified Venice LUP, and the community character and visual resource protection policies Chapter 3 of the Coastal Act.

C. COASTAL HAZARDS

Coastal Act Section 30253, Minimization of Adverse Impacts, states, in part:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Section 30253 of the Coastal Act requires siting new development such that it minimizes risks to life and property in flood hazard areas, assures stability and structural integrity, and does not require the construction of protective devices that substantially alter natural landforms. Concurrently, and as discussed above, the Coastal Act also requires concentrating development in existing developed areas able to accommodate it (as required by Section 30250), which provides more opportunities for people to live near places they work and recreate, such as the beach. This reduces vehicle miles traveled and preserves open spaces that might otherwise be developed, thereby reducing impacts to coastal resources. Overall, these Coastal Act policies support maintaining housing density in safe areas to assure the stability and structural integrity of development.

On November 7, 2018, the Commission adopted a science update to its Sea Level Rise (SLR) Policy Guidance to ensure projects are designed and built in a way that minimize risks to the development associated with SLR and avoid related impacts to coastal resources. These guidelines state, at page 99, “to comply with Coastal Act Section 30253 or the equivalent LCP section, projects will need to be planned, located, designed, and engineered for the changing water levels and associated impacts that might occur over the life of the development.”

The proposed development is located approximately 0.1 miles from the Venice Canals and 0.5 miles from the beach. Under current development and emission patterns (a medium-high risk aversion scenario) and discounting ice sheet loss, site flooding is projected to occur with a sea level rise of 6.6 feet between 2090 and 2100, which is within the end of the anticipated 75-to-100-year life of the proposed development. In

addition, groundwater levels onsite are expected to be entirely emergent¹⁰ if sea levels rise over one foot. While the project site is located somewhat inland, given the relatively low-lying topography of Venice, it is anticipated to experience similar impacts from coastal hazards as properties located farther seaward and/or closer to the canals. It is also important to note that with expected SLR, by 2100, key infrastructure systems across Venice (the road network, electrical station, the storm drains, etc.) are vulnerable, which means the services these residential areas currently rely upon may be at risk.

No basements or significant subsurface structures, other than the pool, are proposed. However, because the subject site may be affected by SLR-related flooding during its expected lifespan and it is unclear at this time what, if any, community-scale SLR adaptation might be implemented in Venice in the future to account for these hazards, the Commission imposes **Special Conditions 8 and 9** to ensure that the risks of property damage or loss arising from sea-level rise or other changed circumstances, including that critical mechanical equipment may be required to be relocated above-grade in the future and potential removal of the subject development, are borne by the applicant enjoying the benefits of its private new development, and not the public. **Special Conditions 8 and 9** also require the applicant to acknowledge that development approval does not permit encroachment onto public trust lands, and any future encroachment onto public trust lands must be removed unless the Coastal Commission determines that the encroachment is legally permissible pursuant to the Coastal Act and authorizes it to remain, and any future encroachment would also be subject to the State Lands Commission's (or other trustee agency's) leasing approval.

In addition, to ensure that any prospective future owners of the property are made aware of the applicability of the conditions of this permit, **Special Condition 10** requires the applicant to record a deed restriction acknowledging that, pursuant to the subject CDP (CDP No. A-5-VEN-21-0036), the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of the subject property; and imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the property. The deed restriction will additionally provide notice of potential hazards of the property, and the risks of flooding and other sea level rise impacts towards the end of the development's economic life.

Thus, the Commission finds that the development as proposed and conditioned, minimizes risks to life and property in hazardous areas consistent with Section 30253(a) of the Coastal Act.

D. WATER QUALITY

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a

¹⁰ When the groundwater table rises to or above the surface of the ground and create surface flooding.

manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

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

The project site is located approximately a half mile inland of Venice Beach within an urbanized residential area (Exhibit 1). However, the proposed development still has the potential to discharge polluted stormwater runoff from the project site into coastal waters. To increase on-site percolation of stormwater and reduce runoff, the applicant has proposed design measures including 1,008 square feet of permeable concrete pavement and 92 square feet of low impact development (LID) filtration planters. These design components will minimize impacts to nearby coastal waters and marine resources. To preserve water quality during construction, **Special Condition 6** requires the applicant to implement construction Best Management Practices (BMPs) including but not limited to the appropriate management of equipment and construction materials onsite. To further ensure that water quality is preserved, **Special Condition 7** requires low water use, drought-tolerant and non-invasive landscaping.

Therefore, the Commission finds that the proposed development, as conditioned, conforms with Sections 30230 and 30231 of the Coastal Act regarding the protection of water quality to promote the biological productivity of coastal waters and to protect human health.

E. PUBLIC ACCESS

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30214 of the Coastal Act states, in relevant part:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

Venice LUP Policy II.A.3, Parking Requirements, states, in relevant parts:

The parking requirements outlined in the following table shall apply to all new development, any addition and/or change of use...

RESIDENTIAL USES: Single-family dwelling

OFF-STREET PARKING REQUIRED: 2 spaces; except projects in the Silver Strand and Venice Canals Residential Subareas, where three spaces are required.

Single family dwelling on lots of 40 feet or more in width, or 35 feet or more in width if adjacent to an alley: 3 spaces

The public access policies of the Coastal Act ensure protection and enhancement of all people's opportunity to access the coast and enjoy coastal recreation. This includes Section 30252, which states that new development should maintain and enhance public access to the coast by providing adequate parking facilities or providing substitute means of serving the development through public transportation. Due to the limited on-street parking in the immediate vicinity of the project, Venice LUP Policy II.A.3 requires single-family residences to provide three parking spaces; this requirement is satisfied by the proposed two-car garage and one additional uncovered onsite parking space accessed from the alley, Ocean Court.

Regarding the construction staging for the project, construction can adversely impact public access by displacing otherwise available on-street, public parking spaces or by blocking traffic. During construction, measures should be implemented to ensure that temporary impacts to public access are minimized. Therefore, **Special Condition 5** requires that a construction staging plan be submitted for Commission review and approval. All construction equipment to be stored overnight shall be stored on-site, outside the street travel-way and on-street parking. Placement of an on-site dumpster shall incorporate use of a flagman to direct traffic during placement.

No long-term, construction or post-construction impacts are anticipated for existing coastal access and nearby recreational facilities. Moreover, the three onsite parking spaces satisfy the certified LUP on-site parking requirements for a single-family residence. As proposed, and conditioned, the development conforms to the applicable policies of the certified Venice LUP, and Sections 30210 and 30214 of the Coastal Act.

F. LOCAL COASTAL PROGRAM

Coastal Act Section 30604(a) states, in relevant part:

(a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a local coastal program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).

The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The City of Los Angeles Land Use Plan (LUP) for Venice was effectively certified on June 14, 2001. The Commission's standard of review for the proposed development is the Chapter 3 policies of the Coastal Act. The certified Venice LUP is advisory in nature and may provide guidance.

As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act. Approval of the project, as conditioned by the Commission, will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096(a) of the Commission's regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). The findings above are incorporated herein by reference.

Under Section 15251(c) of Title 14 of the California Code of Regulations, the Commission's CDP regulatory process has been certified as the functional equivalent to the CEQA process. As a certified regulatory program, Section 21080.5(d)(2)(A) of CEQA still applies to the Commission's CDP regulatory process and prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect which the activity may have on the environment.

The City of Los Angeles is the lead agency for purposes of CEQA. As noted on the City's staff report dated January 7, 2021, the City determined that the proposed development was categorically exempt from CEQA requirements pursuant to CEQA Guidelines Sections 15303 (Class 3).

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. As conditioned, there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse effect which the development may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative, has no

remaining significant environmental effects, either individual or cumulative, and complies with the applicable requirements of the Coastal Act to conform to CEQA.

Appendix A – Substantive File Documents

1. City of Los Angeles Director's Determination for Case No. DIR-2020-3520-CDP-MEL dated January 7, 2021
2. City of Los Angeles Appeal Recommendation Report for Case No. DIR-2020-3520-CDP-MEL-1A dated April 7, 2021

Appendix B – Neighborhood Survey Tables

Table 1. Past Commission actions on structures within the surveyed area since the Venice LUP certification in 2001.

Address	Action No.	Approval Year	Height (ft.)	Lot Size (sq. ft.)	Square Footage		L.A. County Assessor (sq. ft.)
					(original)	(new)	
610 Mildred Ave (revised)	A-5-VEN-21-0036	N/A	28	4,100	1,080	2,719	1,080
2345 Beach Ave	5-04-174-W	2004	28	2,698	565	1,796 ¹¹	1,703
2338 McKinley Ave	5-01-360	2001	30	3,602	850	2,424 ¹²	2,702
Average Square Footage (Original/Redeveloped):					708	2,110 ¹³	2,203
Average Height (Redeveloped):						29	N/A

Table 2. Past City of Los Angeles local CDPs and exemptions issued for redevelopment of all structures within the surveyed area since the Venice LUP certification in 2001. For the few multi-family structures in the survey area, the square footage of any detached structures were combined into one square footage.

Address	Action No.	Approval Year	Height (ft.)	Lot Size (sq. ft.)	Sq. Ft.		L.A. County Assessor (sq. ft.)
					(original)	(new)	
2338 McKinley Ave	DIR-2001-3134-SPP-MEL	2001	30	3,602	850	2,424 ¹⁴	2,720
2416 McKinley Ave	ZA-2001-2593-CDP-ZAA-SPP	2001	26	3,601	2,299	4,779	1,918
2337 McKinley Ave	N/A	2002	25	7,466	935	2,918	2,918
2332 Beach Ave	DIR-2003-4284-SPP	2003	25	2,700	735	2,018	1,784
2337 Beach Ave	N/A	2004	25.5	2,699	504	1,341	1,332
2321 McKinley Ave	N/A	2004	28	3,647	885	2,871	3,219

¹¹ Excludes approximately a 346 square foot detached recreation room built in 2002.

¹² 2,750 square feet on LADBS Building Records website.

¹³ 2,273 square feet based on Footnote 12.

¹⁴ 2,750 square feet on LADBS Building Records website.

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2365 Beach Ave	DIR-2005-4782	2005	N/A	2,698	1,327 ¹⁵	1,533	1,533
2325 McKinley Ave	N/A	2005	35 ¹⁶	3,666	815	2,784 ¹⁷	3,114
2417 McKinley Ave	N/A	2005	25	3,843	1,920	2,304 ¹⁸	2,304
2425 McKinley Ave	N/A	2005	23	3,880	1,207	2,246	2,244
2412 McKinley Ave	N/A	2007	26	3,601	751	2,239	2,314
2432 McKinley Ave	DIR-2016-288-VSO	2016	13.5	3,551	1,340	1,317	1,063
2341 Beach Ave	DIR-2016-4362-CEX	2016	N/A	2,699	1,534	1,703	1,698
Average Square Footage (Original/Redeveloped):					1,162	2,344	2,166
Average Height (Redeveloped):					26		N/A

Table 3. All structures currently within the surveyed area that were constructed prior to certification of the Venice LUP in 2001. For the few multi-family structures in the survey area, the square footage of any detached structures were combined into one square footage.

Address	Original Year Built	Lot Size (sq. ft.)	Square Footage ¹⁹	L.A. County Assessor (sq. ft.)
2420 McKinley Ave	1995	3,600	2,024	2,024
592 Olive Ave	1993	3,785	2,786	2,786
2324 Beach Ave	1966	2,699	1,230	1,230
610 Mildred Ave	1962	4,100	1,080	1,080
2361 Beach Ave	1956	2,698	720	720
2432 McKinley Ave	1956	3,551	1,063	1,063

¹⁵ The 206 square foot addition was subtracted from the total square footage known at this time.

¹⁶ As seen on the 2005 Certificate of Occupancy.

¹⁷ Also includes a 2017 permit for a 9 square foot addition.

¹⁸ Excludes a 560 square foot recreation room added in 1982.

¹⁹ The square footage could include additions approved after the original construction but prior to the 2001 certification of the Venice LUP.

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2349 Beach Ave	1954	2,699	1,835	1,835
2353 Beach Ave	1954	2,698	843	843
2330 McKinley Ave	1954	3,602	926	926
2334 McKinley Ave	1954	3,602	860	860
2314 McKinley Ave	1953	3,615	1,280	1,280
2424 McKinley Ave	1953	3,600	1,448	1,448
2340 Beach Ave	1953	2,439	852	852
2334 Beach Ave	1952	2,700	1,680	1,680
2317 McKinley Ave	1950	3,628	1,130	1,130
2413 McKinley Ave	1950	3,823	1,550	1,550
2429 McKinley Ave	1950	3,900	700	700
2433 McKinley Ave	1950	3,835	1,268	1,268
2408 McKinley Ave	1950	3,601	700	700
2421 McKinley Ave	1949	3,861	768	768
2326 McKinley Ave	1949	3,603	800	800
2325 Beach Ave	1949	2,700	1,080	1,080
2428 McKinley Ave	1948	3,600	1,246	1,246
612 Olive Ave	1947	3,602	1,080	1,080
2333 Beach Ave	1941	2,700	810	810
620 Mildred	1939	4,640	2,597	2,597
2319 Beach Ave	1937	2,700	1,464	1,464
2318 Beach Ave	1936	4,428	1,990	626
2346 Beach Ave	1926	2,204	1,627	1,627
615 Olive Ave	1925	3,602	1,479	1,003
2357 Beach Ave	1924	2,698	1,014	1,014
2409 McKinley Ave	1924	3,804	1,608	1,608
2317 Beach Ave	1923	2,700	1,604	1,104

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2342 Beach Ave	1923	1,870	600	600
2329 McKinley Ave	1923	3,686 ²⁰	870	870
2309 Beach Ave	1921	2,700	893	893
2329 Beach Ave	1921	2,700	804	804
2328 Beach Ave	1921	2,700	1,530	1,530
2313 McKinley Ave	1920	3,623	1,474	1,474
Total Number of Residences in Table:			39	39
Average Square Footage:			1,264	1,204

*Information obtained from ZIMAS on June 24, 2021.

²⁰ Lot size on LandVision is 7,390 square feet.