

**CALIFORNIA COASTAL COMMISSION**

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**W17c**

**A-5-VEN-21-0052 (LA Riverstonegrey, LLC)**

**November 17, 2021**

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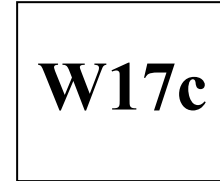
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California Coastal Commission  
c/o South Coast District  
301 E. Ocean Blvd., Suite 300  
Long Beach, CA 90802



Re: Appeal No. A-5-VEN-21-0052  
628-628 ½ Santa Clara Avenue, Venice  
Meeting Date: November 17, 2021; Agenda Item No. W17c  
**Project Support**

Dear Honorable Commissioners:

This office represents Hillary and Stephen Zashin and LA Riverstonegrey, LLC (“Zashin”), the owners of the property located at 628-628 ½ Santa Clara Avenue in Venice (the “Property”). Our clients sought and obtained a local coastal development permit from the City of Los Angeles (“City”) that authorized the demolition of the existing vacant duplex and the construction of a single family home, with an accessory dwelling unit (“ADU”). Upon a third-party appeal and substantial issue finding by the Commission, Zashin has revised the project to include a full second unit, instead of an ADU, and thereby maintain a duplex on the Property (“Revised Project”). Staff recommends approval of the Revised Project and Zashin agrees with the de novo Staff Report findings and all proposed conditions. **For the reasons contained in this correspondence and to be presented at the Commission’s November 17, 2021 hearing, Zashin urges the Commission to approve Coastal Development Permit No. A-5-VEN-21-0052.**

#### **A. PROJECT BACKGROUND**

The property is a modestly sized 5,200 square foot parcel, approximately .6 miles from the beach in the Oakwood subarea of Venice on Santa Clara Avenue. The Property is zoned RD1.5-1 and designated for Low Medium II Residential uses by the certified Venice Land Use Plan (“LUP”). The surrounding area is characterized by a mix of single-family and multi-family uses.

In May, the City approved Case No. DIR-2019-5257-CDP-MEL which involved the demolition of the existing duplex and the construction of a new single family home with an ADU (“Original Project”). Extensive findings were made that the Original Project conformed with Chapter 3 policies, the City’s zoning, and the certified Venice Land Use Plan (“LUP”). The Original Project

was recommended for approval by the certified Venice Neighborhood Council. No appeals were filed at the local level.

Following the City’s approval, on July 23, 2021 Citizens Preserving Venice (Robin Rudisill or “Appellant”) appealed the Original Project to the Commission citing concerns with an alleged loss of density (the “Appeal”). Specifically, the Appeal argues that replacing a duplex with a single family home and an ADU would have an adverse impact on housing supply, that the Original Project was incompatible with the community character, and that somehow the Original Project failed to conform to Chapter 3 Policies of the Coastal Act.

**B. THE PROJECT WAS REVISED TO ADDRESS ALL APPEAL ARGUMENTS**

Even though not required to maintain density under any applicable state or local law, Zashin immediately and voluntarily modified the Original Project to address and dispense with the arguments contained in the Appeal. As illustrated below, the existing dilapidated and vacant duplex will now be replaced with a new duplex. With the Revised Project, parking is bolstered from three (3) spaces to five (5) spaces so that the duplex will now comply with minimum parking requirements.<sup>1</sup>

Revisions included redesigning the project to accommodate a duplex in lieu of a single-family residence and ADU, and adding two additional parking spaces. The existing duplex is 1,655 square feet and the proposed duplex is 2,993 square feet. While both the new duplex units will be larger than the existing units they replace, the total square footage has been reduced in the Revised Project.

| <b>Original Project</b>  | <b>Revised Project</b>  |
|--|---|
| Single-Family Residence (3,2554 sq. ft.)<br>ADU (581 sq. ft.)<br>1 Car Garage + 2 on-site parking spaces<br><br><i>SFH + ADU w/ 3 parking spaces</i> | Duplex (582+2,253 = 2,993 sq. ft.)<br>2 Car Garage + 3 on-site parking spaces<br><br><i>Duplex w/5 parking spaces</i> |

The modifications made to the Original Project directly addresses claims in the Appeal regarding an alleged adverse trend in loss of housing density. The Revised Project replaces what was to be a single family home plus ADU with a duplex for purposes of maintaining two separate housing units, each larger than the existing duplex units.

In addition, the Revised Project similarly dispenses with Appellant’s claims regarding the Original Project’s compatibility with neighborhood character and land use designation, as well as cumulative impacts that may result from eliminating multi-family units to make way for single-family residences. The Revised Project now maintains a multi-family duplex on a lot zoned for multi-family uses in the certified LUP and will not, therefore, “set a precedent” or contribute to a

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<sup>1</sup> Zashin also worked with staff on project changes to address future sea level rise. Although not discussed in detail here, Zashin incorporated those conditions into the Revised Project and concurs with those conditions.

trend in “downzoning” the area. The Venice housing stock is being preserved and the duplex is inarguably consistent with the zoning, land use designation, and surrounding mix of housing.

**C. CONCLUSION**

Zashin has worked tirelessly with staff to ensure that the Revised Project continues to be consistent with Chapter 3 of the Coastal Act, while also addressing each and every issue raised in the underlying Appeal.

**On behalf of Zashin, we ask for your support for the Staff Recommendation for Approval of the Revised Project with Conditions.**

Thank you for your consideration.

Sincerely,

GAINES & STACEY LLP

*Fred Gaines*

By

FRED GAINES

cc: All Coastal Commissioners (Via Email)  
Dani Ziff (Via Email)