

**CALIFORNIA COASTAL COMMISSION**

South Coast District Office  
301 E Ocean Blvd., Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



## Letter of support

11/04/2021

Dear California Coastal Commission:

This letter of support for the building of (2) new single-family homes at 1305 and 1307 West Paseo Del Mar is written because of a potential scheduling conflict with my personal attendance of the hearing scheduled for mid December 2021.

This by-right project already went through the Coastal San Pedro Neighborhood Council as well as the Harbor Area Planning Commission. The Planning and Land Use Committee of the Coastal San Pedro Neighborhood Council voted to take no action during the meeting I presided over as Chair (because we were simply not qualified to make a decision if this project should or should not take place. That is the job of the architects & engineers. Nothing about this seemed outside of the scope of by-right).

What started out as the protest of: 'we don't like the way these houses look and they are too big' turned into 'these houses will make the cliff collapse'. You would think the latter would precede the former.

So, I then decided to attend the Harbor Area Planning Commission Hearing to voice my support as a stakeholder of the community once I saw what was really going on here. At this meeting it was presented and determined by Los Angeles City Staff, and Geologists, that not only would there be no negative impacts to the cliff, but the construction process of these two homes would actually fortify the cliff and make it stronger when this construction is complete.

Now, here I am again, supporting the same project from another appeal by the same group. The group that is appealing this project has made it a mission to appeal any and all projects in and around San Pedro for always the same reason; "to stall them and waste time and money". There is a specific member of the community, who you may already know by name, that is spearheading this appeal. This same person spearheads all the appeals in the area.

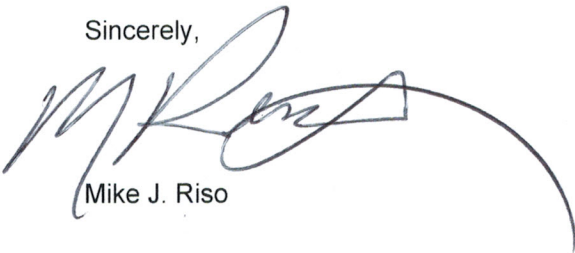
If I were able to attend this meeting in person I would go into further detail, for as much time as you would allow, as I explained to you how I was personally bullied, harassed and intimidated for writing a letter of support. How my neighbor was verbally accosted by the wife of the adjacent property owner screaming "how can you support this project; you are renters and these are Indian People". How I had to call order multiple times during the public meeting I presided over as Chair for Planning and Land Use for CSPNC and how the neighbor invited the architect "outside, to settle this" during that same public meeting.

What we have here, unfortunately, is a system in place for legitimate reasons being abused by a group of professional appellants, and for all the wrong reasons. A group that typically focuses on high-density projects has for whatever reason, turned their attention to a house. A single family house.

It is my understanding that after recent Senate Bills passed, this project, could, in theory, be easily turned into a pair of multi-unit buildings. So, it is in the best interest of all involved that the current project be approved as presented and without further delay.

I ask that you, California Coastal Commission, approve this project for the final time, right here, right now, today.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike J. Riso", with a long, sweeping horizontal line extending to the right.

Mike J. Riso



**From:** [Noel Gould](#)  
**To:** [Vaughn, Shannon@Coastal](#)  
**Cc:** [Lee, Vince@Coastal](#); [Stevens, Eric@Coastal](#); [Robin Rudisil](#); [Mark](#)  
**Subject:** Letters opposing 1305 and 1307 W. Paseo del Mar San Pedro, cA 90731  
**Date:** Wednesday, December 1, 2021 2:15:52 PM  
**Attachments:** [Letters opposing 1305 and 1307 W. Paseo del Mar.pdf](#)

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Hi Shannon and Vin,

I've attached a collection of comments from community members taken from a couple of city hearings on 1305 and 1307 Paseo del Mar.

These comments reflect the community concern. Of particular importance is the comments from the applicant's engineer on page 24 where he says 1344 cubic yards of cut will occur, a drastically larger number than what they're saying now, and you made a point of telling us in our meeting that such facts would be of interest/concern to you.

Sincerely,  
Noel  
310-625-1157

**Emails received in response to February 2, 2017 public hearing:**

Susan and Mike Allison (Owners of 1221 Paseo del Mar) – February 2, 2017

- We object to these projects.
- Plans exceed specification outlined in the building code, there is a disregard for setback rules everyone else in the neighborhood has had to abide by.

S.A. Holwerda (Owner of 1217 Paseo del Mar) – February 2, 2017

- The lot is extremely dangerous with a large drop caused by an old landslide. I urge you to engage independent geologist and pay attention to their recommendations.
- This whole area is subject to movement and will add to the weight of the cliff.

Wayne Widner (Owner of 1218 Paseo del Mar) – February 2, 2017

- I object to three aspects of the project but safety is the main objection.
  - The size of the project in the specific location listed will have adverse effects on the geology of the adjacent properties. The project will require serious foundation work due to the unstable geology. New projects on the bluff require concrete piers down to the bedrock.
  - The process of drilling the site will be destabilizing to the geology and put the neighborhood at risk.
  - The project's height and footprint that will be required to support the structures is non-conforming.
  - The neighborhood does not have structures of this height and it's outside the norm. The project will create precedents for new projects that we do not want, structures that will permanently will change the feel and look of the neighborhood.
-

- The project will adversely affect the property values.
- The height and volume will block the views of those across the street and will change the neighborhood aesthetic.
- To approve this project in its present form will place the safety and property values of adjacent properties at risk. Please deny this application.

Jen Grasso and Monica Hall (Owners of 1210 Paseo del Mar) – February 1, 2017

- Concerned about the size of the proposed residence, this is absurd.
- There is not a single home in the Palisades that large.
- The height of the proposed structure will block the views of many existing homeowners.
- We are not pro-mansionization, there must be some moderation when building in our neighborhood.

Mike Dwane (Owner of 1422 W. 37<sup>th</sup> Street) – February 1, 2017

- Concerned about the size of the proposed residence.
- The height is only part of my concern, I believe the project would exceed the mini mansion remodel rules.
- The lots are not as big as the maps show because a large percentage of the lot is in a very steep hillside where the signs of erosion over the years exist.
- Concerned about the amount of foundation work that will have to be done and how that could impact the stability of the main road in our neighborhood.
- There was a major slide 1,000 feet from the proposed building.

Christophe Tocco (Owner of 1151 Paseo del Mar) – February 1, 2017

- Against any construction on the ocean side which are not within the current size and scope regulations.
- Paseo del Mar is a very public Street with lots of walkers and new houses should not exceed current limits.
- There have been landslides in the area and two huge houses on a cliff do not sounds like a good idea.
- No size exceptions should be given.

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Wayne Widner – May 6, 2018

- Submitted a February 11, 1970, Engineering Geological Investigation report completed by the City of Los Angeles Department of Building and Safety. The report concluded that "Any new structure contemplated for construction on the south side of the street should be placed as close as possible to the street in order to provide a safe setback from sea cliff. Engineering geological and foundation engineering studies should be made prior to construction on any of the lots on the south side of Paseo del Mar. If setbacks cannot be maintained then each structure should have its foundation designed to compensate for the geological instability of the sea cliff."

Wayne Widner – May 2 2018

- The project is out of scale with the vast majority of homes on the bluff,
- Issues concerning setbacks and excavation volumes, and the compromising effects of the project still exists,
- The project does not comply with the Mansionization Ordinance,

Blaine Beron-Rawdon – April 30, 2018

- Concern that both houses do not adhere to the letter of the San Pedro Specific Plan,
- Concern with the proposed design that is a huge size and modern characteristic and inconsistent with the neighborhood,
- Excessive height and roof decks are contrary to code & may block ocean views,
- Mansionization of Paseo Del Mar, is spoiling the present attractive character of the neighborhood.

Coastal San Pedro Neighborhood Council – June 18, 2018

- The Coastal San Pedro Neighborhood Council opposes the projects at 1305 and 1307 Paseo Del Mar, case numbers ZA-2013-3632-CDP-MEL and ZA-2013-3636-CDP-MEL, as currently proposed

Hamilton & Associates (c/o Mark Severio) - June 26, 2018

- At your (Mr. Mark Severino) request, the writer has reviewed 10 geotechnical reports, dating from 2013 to 2017, covering the subject project.
- Pulling the house, soldier piles and foundation back from the top of the bluff slope 63 to 75 feet, or more would be reasonable from a safety and design standpoint of view. This may satisfy the California Coastal Commission. Because the property does not have a factor of safety of 1.5 in its current state, it is unknown what the California Coastal Commission would require.



- There were landslides back in November and December along the bluffs,
- I questioned the property's geology report,
- I have to deal with the criminal behavior next door, because the Coastal Commission and LA City did nothing about what they were doing,
- I have zero faith in the plans submitted to the city,
- I was assured the deck constructed next door would never open, but they opened it anyway,
- There is no need for a deck above the two-story, such a home needs to be in Pacific Palisades,
- The land is fragile and the community will become fragile because of the work,
- Around 1964/65, there were landslides and the bluffs fell off, and homes fell off too,
- People are not fully aware of the bluffs' history,
- The plans are dangerous,
- The coastal bluff is a fragile place,
- The owners are not a family but investors,
- They are not building or designing to fit in with the neighborhood,
- I'm concern with the shaking of the bluffs,
- I've dealt with the City and I have no faith in the City, or Coastal Commission,
- Zero faith in both,
- I'm disgusted with the Council Office, because it is not taking any position on the project.

Wayne Widner – Paseo Del Mar Resident

- I'm concern with the project's aesthetic, and its conformity and compliance with the specific plan,
- But my major concern is the geology and the geological technical reports,
- Even if the project is done right, the effect on the neighborhood will be detrimental,
- The bluff is prone to movement, and the boring will be concussive,
- Concern with geology first and foremost,

Mark Severnio – Paseo Del Mar Resident

- In the geologist's letter to Mr. Steeno, it says the property is not in a landslide area and that's not true,
- The MND says the property is in a landslide area,
- The MND says that 300 cubic yard of soil will be removed, and that will lead to major erosion, and it will destabilized the site,
- There were two different borings done that led to cracks in my home,
- The caissons will have to go 75-80 feet deep, and be 3 feet in diameter,
- Please note that the maps are not made to scale,
- The geological structure of the property is similar to Whites Point that had a landslide,
- "read" the zone variance language,

- The project proposes to conform to code, but it is not observing the 75-foot setback from the rear property line,
- Why does the applicant believe they can get a variance to build into the setback area?
- (submitted a portion of the application and the application addendum)
- The lots are zoned R1,
- If they are removing affordable housing, then how are they being replaced?
- Where is it being replaced?
- Were the boring activities permitted?
- The big trucks will put undue pressure on the land,
- The project belongs in the Venice area and not in San Pedro,
- The applicant should be trying to maintain the San Pedro character,

Claudia Kreis – South Dolphin Avenue

- My view has been eaten away over the years, and I've been here since 1986,
- My neighbor submitted erroneous plans to the City and built against the code,
- It's a disgrace that the architect did not know the height requirements,
- My neighbor backfield on his lot,
- I'm concerned with the lack of monitoring and enforcement by the City,
- I have no problem with the building, but it needs to be consistent with the neighborhood,

Mary Andersen – Almeria Street Resident

- I've been a resident since 1984,
- When I was adding onto my house, there were complaints about my second story addition, and I had to reduce it to 7 feet,
- I called about three projects in the area and nothing was ever done about them,
- This site requires building inspections on a weekly basis,
- The quality of the building inspection by the City is questionable,
- I just request that the building inspectors be there to do their job,

Gina La Fougé – Paseo Del Mar Resident

- I was not notified about the hearing and just found out,
- I'm within 100 feet of this project and did not get any notification,
- It will have an impact on the scenic view,
- I'm agreement with all my neighbors,
- I can't imagine the chaos this will cause,
- There will be traffic from the construction and activate a sink hole,
- The project needs to be scaled back,

Jennifer McMullen

- I asked that the project do not block views,
- Most of the homes were built in the 20s, 30s, and 40s,
- The garage should be place in the back,



- It will be an eyesore,
- The house should fit in with the character of the neighborhood,

Desiree Atkins – Paseo Del Mar Resident

- The map shows a large lot but that is deceiving,
- ZIMAS shows the large lot but it is not a buildable lot,
- The specific plan and the California Coastal Act have been around for years,
- The California Coastal Commission calls for a 30-foot height,
- The San Pedro Specific Plan calls for a 21-foot height,

Lorna Wallace – Paseo Del Mar Resident

- I'm a six year resident,
- This is my dream house and my retirement house,
- My view will be blocked, and my value will be destroyed,
- I was not informed about the boring,
- The equipment they used caused damages,
- This project is going to affect my retirement plans,

Mike Allison Paseo Del Mar Resident

- We bought our house about 1½ years ago,
- We would not have bought it, if we saw their plans to build,
- There are always new rocks on the steps,
- I will not be convinced that the project is safe,
- There is a huge vertical gauge, and it is disingenuous to say it can built upon,
- It's a deep lot but you cannot build on all of it,
- I can't even get slide insurance; so many things are deceptions,
- There were no permits for the boring; there have been errors,
- This is a neighborhood and not an enclave,
- If there are sensible plans for a sensible home, then there is no problem,
- There is no consideration for others; we were not able to see the plans,
- Our lots can be rendered valueless by this project,
- Have them (owner and applicant) come back with sensible plans,
- I question the house's removal,
- I need to understand how the house is to be removed,
- Is it with caterpillar or will it be done by hand?
- Where do you get the 300 cubic yards of soil, because that's a lot,
- The typical dump truck carries only 15 cubic yards of dirt,

Kenny Atkins – Paseo Del Mar Resident

- I'm opposed to the project, because of the geology of the area,
- The area is comprised of decomposed shells,
- I make rescues for a living, and made many rescues because of the cliff falling,
- This area can't withstand a house like a mansion,
- There will be lots of construction traffic,

- The area has become a cul-de-sac and the project will mean more traffic,
- The zoning says the height must be 26 feet; my deed says it must be 26 feet,
- The architect for the project is questionable.

Kathleen Martin - Almeria

- The plans are out of conformance with the specific plan,
- The plans are out of conformance with neighborhood,
- The architect did not consider the bluff side,
- I ask the applicant to consider a tiny house,
- The project would risk lives, and rescue personnel,
- I'm concern about the safety of the project,

Council District 15 Representative

- We are not taking any position at this time,
- We thank everyone for coming out

Mary Rose Fink – Patton Avenue Resident

- Yes, the owner has a right to build on his land,
- But this is not just any land, but land that is on the coastal bluff,
- Is the project really two stories high?
- This changes the site line,
- The Coastal Commission has been very strict on these kinds of projects,
- I'm not in favor of the project, but may be it should be one or two stories,
- I'm oppose to any type of large fencing,
- We're okay with them building a retirement home but, not oaky with spec homes,

Noel Gould - West Paseo Del Mar Resident

- I'm a candidate for City Council District 15,
- The noticing was just posted two days prior today's hearing,
- The Community Plan Land Use policies states: maintain the distinguishing characteristics of San Pedro residential neighborhoods with respect to lot size, topography, housing scale, and landscaping, to protect the character of existing stable neighborhood from new, out of scale development.
- The Specific Plan states the Scenic and visual qualities of coastal areas must be considered and protected as a resource of public importance.
- Prior to the issuance of a grading permit or building permit, the Department of building and safety shall determine that a project complies with the regulations of this Specific Plan.
- The San Pedro Specific Plan is the governing document for Coastal Development Permit requests,
- Why isn't there a specific plan request?
- There were two MND produced; in the 2014 MND, the LAUSD opposed the project because the square-foot was misrepresented, and the analysis left out the aesthetics, land use, and planning impacts,
- I have a list of 38 properties and the square-footage of the two homes together is greater than 20% of the square-footage of the entire street,
- The floor area (FAR) exceeds what is permitted in the area,

Elaine Clark – Paseo Del Mar

- The homes are too large for the neighborhood,



Susan Holwerda - Paseo Del Mar Resident

- I object to the whole project because it is on the hill,
- They have to put in caissons and that will cause damages to our properties, the street and the cliff,

Betty Ciuchta Paseo Del Mar Resident

- I oppose the development of the homes in the area where a few houses have fallen into the ocean,
- If there is instability in the bluff, then why disturb it now,
- Across the street, the homes are not on a bluff,
- There are lots of inconsistencies about what is real and what is not real,

Noel Gould – Paseo Del Mar Resident

- I want to incorporate my February 2017 testimony into the record,
- You just need to look a couple of sections of the Community Plan and Specific Plan to know the project does not belong in the neighborhood,
- I'll read from pages 37 and 38 [read from the section addressing the geological requirements]
- The specific plan has regulations and maps that regulate development in the area,
- The geological engineering report states the project will cause a geological hazard,
- [read from the specific plan pages and contends the project does not comply with the Specific Plan,
- The project exceeds the proposed 4,447 square feet,
- There is a potential to create instability of the slope,
- There are only three homes in the area that exceed 3,000 square feet,
- The Planning Department was on the verge of terminating the project,
- The average size of the homes in the neighborhood is about 1,600 square feet,
- There is no nod to the community,
- The project does not reflect the beauty of the neighborhood,
- The letter from the Neighborhood Council may have been issued by the wrong committee.

Mark Severino – Paseo Del Mar Resident

- I'm the next door resident,
- They just demonstrated the ongoing misrepresentation of the project,
- In the initial application, it stated there was not scenic impact, no tree impact, and that is not the case,
- They say it's not in the area where there is expansive soil, but it is,
- In the June 2017 letter, they say it's 300 cubic yards of soil, but it is more,
- The average home is 1,600 square feet,
- When they were doing the geological boring, the work created cracks in my house, cracks to the foundation and cracks to the walls,
- They can't dig down 4 feet and destroy my foundation and build up to a 30 feet height,
- [read from an email sent by Shannon Vaughn of the California Coastal Commission], if erosion is apparent, then the structure must be removed,

- [read from MND page 3]
- After going through all the documents, they have been misrepresenting the facts,
- They are misrepresenting the fact that they have zero trees greater than 6 feet in diameter,
- Every person along the bluff is against this project,
- I take offense to that April 23, 2018 letter,

Mike Allison - Paseo Del Mar Resident

- I'm directly south and east of the project,
- This is the first time that I'm hearing of the digging going 4 feet down,
- That can't be done,
- How long do we have to secure a geotechnical report?
- We don't have a financial interest in their project,
- The majority of the lot is a cliff,
- I have no idea how they can safely remove or excavate all that dirt,
- There is no sidewalk in the drawing,
- I agree with Mark Severino,
- My major objections is the enormity of the project,
- It will destroy Marks' view,
- The average weight is 275 lbs. per square feet,
- There is no engineering report to support the proposed project,
- I'd like to see the drainage plan; I'd like to see if it goes into the city sewer,
- The homes are so out of scale and unattractive, and will have a huge impact on the views of the homes across the street,
- My first exposure to the project is when Mark was screaming at the guys on the site,
- I'm concerned with the misconception and misinformation about the project,
- I received no notice,
- The last time I spent the entire day trying to get through to the Planning Department,
- It is ludicrous the time we are being given to produce our own geotechnical report,
- It is a bad idea; this is a neat neighborhood,
- This is the first time I learned of the 25 feet setback,
- The previous owner was told he could not build on the land; he was proposing a 1,500 square feet house,
- This is not the first time that someone has proposed to build on the property,
- This lot has been looked at before,

Neil Boissonwault – Paseo Del Mar Resident

- I'm opposed to the project because of the size and the amount of soil that has to be excavated,
- My neighbor spent two years building a staircase and within 6 months, the staircase was washed away,
- We decided we'd like to build but because of the instability of the soil, we did not,

Penelope McKenzie - Paso del Mar Resident,



- 1,300 cubic yard is 44 truckloads of dirt,
- Every time there was pounding, our house shook; the whole foundation moved an inch because of the drilling,
- It cost \$12,000 to fix the problem; to say there is no impact, it is just BS.
- Every time it rains, there is major erosion,
- Not one neighbor on Paseo Del Mar has signed on to the petition,
- I'm not opposed to building, but build according to the scale,
- There should have been two public hearing notices, but there was only one,
- We can't go onto their site to do a geotechnical report,

Al Steele – Cumbre Drive Resident

- I'm a friend of Mark and Penny,
- 5-8 years ago, stairs were moved and disintegrated,
- You can see land that is already moving,
- My eyes see that this land has been moved a lot,

Stephen Peter – Applicant's Engineer

- Neighboring properties should be concern
- The other firms hired to conduct the study found this to be too complicated,
- We've shown a safety factor of 1.5 or more,
- The City is concern with the westerly portion of the street,
- Other firms were concerned with the City's suggested safety factor,
- The City was very conservative in their safety factor requirement,
- They required that we back calculate the safety value,
- The project will fortify the bluff
- Fortifying the bluff is good for neighboring properties
- The increase safety factor will help fortify the bluff,
- The 1,340 cubic yard of soils is the maximum that will be excavated, but that will not necessarily be the amount moved off site,
- Most of the soil will remain in the site,
- All homes require a precise drainage plan,
- We can't build within 25 feet of the bluff,
- The soldering pile wall will make the property more safe,
- Building exceed the 1.5 safety factor is good

Nathan Holmes – Planning Deputy Council District 15

- We generally defer to the Planning Department for single family homes,
- Our office does have concerns about the soil excavation and the possibility of destabilization; and the size of the homes and their compatibility with the neighborhood character,
- Our position is to stick with the facts,
- Does the project confirm to the Los Angeles Municipal Code?
- Does the project confirm with the Community Plan?
- Does the project confirm with the Specific Plan?

**From:** [June Burlingame Smith](#)  
**To:** [Vaughn, Shannon@Coastal](#); [Lee, Vince@Coastal](#); [Eric.stevens@coatal.ca.gov](#)  
**Subject:** Bluff Stability in San Pedro  
**Date:** Wednesday, December 1, 2021 2:25:13 PM

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Dear Coastal Commissioners:

Many of us were thrilled beyond belief when the Coastal Commission was formed, seeing it as a trustworthy attempt to preserve both the nature and the character of the California Coast, and the Commission over the years has performed extremely well to do just that.

But once in a while, exceptions are made to the rules it has established, and one of those rules is that buildings on bluffs, especially ones that are in or near slide zone areas or unstable bluffs, should not be built if they require caissons. It does not matter that the City might think otherwise, after all that's one of the paramount reasons the Commission was established, because the Commission has a broader duty to protect the coastal areas as best it can from local blindness and greediness. These are battles that involve many economic issues, not only for homeowners and their architects and builders, but for all whose property will be threatened by such encroachment near or next to their own properties, and to the city or county or state that has to shore up these bluffs when such building undermines the fragile environment. Approval will also allow other caisson related building permits along this long know unstable bluff, and this will further hasten the slippage into the ocean of this cliff.

So, I am asking the Commission to look at the report for 1305/07 Paseo del Mar in San Pedro when the City submits its report approving the construction of a "mega-mansion" that requires caissons to build. It goes against the rules and policy of the Commission, and there is no overriding issue that demands that this exception to Commission's long held rules and policies that can possibly be more important than this bluff's stability. I ask that the Commission deny this permit on the basis of its own rules.

Not only is the integrity of the bluff and neighborhood at stake in this issue, but also the very integrity of the Commission itself. Too many instances of backsliding on firm policies damages the reputation and trust that the Commission has worked so hard over the years to establish. The bluffs in San Pedro are a clear example of how the Commission can maintain its good standing with the local community by adhering to its own well founded policies and procedures. Not to do so, is both dangerous to the community but also undermines the integrity of the Commission.

Please deny this permit that includes deep caissons along a bluff that is slowly eroding away.

Thanks.

June Burlingame Smith



3915 S. Carolina Street  
San Pedro, Ca 90731

310 831 0726

Burling102@aol.com

**From:** [Noel Gould](#)  
**To:** [Vaughn, Shannon@Coastal](#)  
**Cc:** [Lee, Vince@Coastal](#); [Stevens, Eric@Coastal](#); [Hudson, Steve@Coastal](#); [Ainsworth, John@Coastal](#); [Mark](#); [Robin Rudisil](#)  
**Subject:** 1305 & 1307 W. Paseo del Mar soil export info  
**Date:** Thursday, December 2, 2021 4:07:01 PM  
**Attachments:** [1305 & 1307 original CDP application.pdf](#)  
[1305 & 1307 cut and fill.pdf](#)  
[EXHIBIT B Paseo del Mar Bluffs SF Baseline with new proposed.pdf](#)  
[1305 & 1307 compound.pdf](#)  
[1305 & 1307 Shannon Email.pdf](#)

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Hi Shannon and Vin,

I've attached an excerpt from the original CDP application showing that the applicant claims there are no trees larger than six inches in diameter when in fact there are a number of trees over several feet in diameter. More importantly, on the original CDP application, they claim 95 CU yards of cut and 35 CU yards of fill, and in the subsequent email to Stacy Farfan at LA City, they more accurately claim 751 Cu of cut at 1307 and 590 Cu of cut at 1305 totaling 1341 Cu of cut which basically matches their engineer's claim of 1344 Cu of cut documented in the email I sent you yesterday.

It follows that if they were allowed to install three rows of soldier pile walls per lot, aka shoreline armoring devices aka sea wall, aka bluff top protection, 12 across, 3 rows deep, 3 foot diameter, 85 feet deep yields 22.24 Cu yards per caisson times 36 per address = 800.64 Cu per lot totaling 1,601.28.

Even if the depth and number of caissons vary slightly, it's impossible to install enough to achieve the required 1.5 factor of safety without major soil excavation in the 1350 Cu yard to 1600 Cu yard range which is vastly more than the meager 115 Cu yard and 60 or so Cu yard removal that they're claiming.

As we've said all along, this applicant has a pattern and practice of manipulating the City and now apparently the Coastal Commission regarding these projects.

Incidentally, the Severino residence they claim is 3,448 square feet is only 3,201 square feet according to the assessor, and it's also only one story vs. two stories with roof decks.

We, as a community, rely on the Coastal Act for guidance for what is permitted to be built in the Coastal Zone. You know that Robin and I have actively participated in Coastal Commission meetings for the past eleven years, and before Covid, we attended virtually every meeting every month no matter where in the state they were held. We are passionate about saving the coast and especially our Special Coastal Communities, and both San Pedro and Venice carry that designation, but San Pedro hasn't been destroyed in the same way that Venice has, and this is a precedent setting

development where you can get it right before it's too late!

Point Fermin Park has the oldest light house in California, built in 1874, and Paseo del Mar is designated as a scenic highway for a reason. The entire bluff area is a hugely popular visitor serving destination not only because of the ocean views but also because of the extremely varied styles of homes, the beautiful yards, and low-density architecture on the bluff. Paseo del Mar is bracketed on the east by the Sunken City land slide, an area of constant land movement and on the west by the White Point land slide in which a section of Paseo del Mar collapsed almost exactly ten years ago on November 20, 2011, and there is other land slide activity occurring on other bluff top lots.

Even 1305, one of the lots in question, has a storm drain easement on the east side of the property which makes the proposed dimensions of the house impossible if they are to observe the seven-foot setback requirement, and the outflow from that drain causes dramatic erosion during any significant rain event.

Attached is an email from Shannon Vaughn dated February 27, 2017 which states in part that "*the minimum setback may be further restricted based on the findings of the geotechnical report. The geotechnical report must consider impacts of the development for 100 years. Given this consideration, all new development must be sited and designed so it does not rely on blufftop (or shoreline) protection. Development within the minimum required setback must be easily removable if it becomes subject to erosion or found to be unsafe due to geotechnical conditions.*"

Shannon, you had it right in this email, but something has happened that caused you to shift your position from one supporting the Coastal Act to one which skirts the Coastal Act.

There is NOTHING about this project design that allows for easy removal if it becomes unsafe! And you're not even asking for a removal plan ahead of time anymore as Eric Stevens originally requested. Furthermore, it DOES rely on bluff top protection to achieve the required 1.5 factor of safety. The smoke and mirrors game of simply not calling 72 caissons blufftop protection to avoid the takings arguments absurd.

At a minimum, this project needs to be scaled back. The idea that community character is determined by the ability to see blue water, that 12,000 square foot compounds, see the attached rendering showing the massive street view of both properties with a single wall joining them making them look like one giant compound, located in 1600 square foot average single family neighborhoods are okay, and that the cumulative effects of projects such as this, which would allow for the complete mansionization of the bluff, are ignored, flies in the face of the letter and intent of the Coastal Act and is unconscionable!

Even the garages, 921 square feet and 690 square feet are larger than a number of homes situated on the bluff!

We have never questioned the right of this applicant to build on these lots, and we support their right to do so, but these projects as proposed are not the solution!

When evaluating community character, one must consider what amount of development would be permitted that would cause a material change in the baseline square footage. Many people look at a few houses or perhaps a block, but we've analyzed the entire square footage of the south facing bluff, 38 properties in all, and the average square footage of the homes is about 1,600 square feet. The average size of the garages is about 400 square feet. We calculated that anything that would cause more than a 10% increase in the baseline square footage of the entire bluff would constitute a material change, and the maximum square footage this applicant could build for both houses to reach that 10% threshold is 2,300 square feet per house. The average garage size is 400 square feet, so that would be fine, and perhaps 520 square feet for the house that now has a 921 square foot proposed garage would be okay.

We, the community, are not being unreasonable. The applicant has hired the most feared coastal lobbyist to represent them on their quest to build two mansions that look like one giant home effectively creating a lot tie with a common wall which would set the precedent allowing every home owner on the bluff to do exactly the same or larger!

This is unacceptable and NOT what the Coastal Act or what the people of California intended when they decided to protect the California Coast as a resource of public importance for generations to come.



The Paseo del Mar bluff homes are one of the last places in the state where people can drive to see what the original California Coastal developments of the 30's, 40's, and 50's looked like. It's a beautiful and special place where people can experience the unique and special blend of homes that are a living history of the state and what the California Coast used to be like. These houses have yards and open space. This neighborhood has character.

Section 30251 of the Coastal Act states in part:  
The scenic and visual qualities of coastal areas SHALL be considered and protected as a resource of public importance. Permitted development SHALL be sited and designed to protect views to and along the ocean and scenic coastal areas, *to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas...*

*This is NOT THAT! Coastal areas are not only the ability to see blue water. They're the entire area including the characteristics of the homes.*

The Coastal Commission is our last line of defense in our quest to protect the Coast, and when outside forces representing big money interests twist the Coastal Act to ignore the vital sections that were written to protect the Coast the way they were for a reason, Coastal Staff and the Commission must resist these influences.

If you're going to allow these projects with caissons because nothing can be built safely without them, you must scale them back, situate them farther back from the bluff, and reduce the garage sizes as well.

Your job is to protect the Coast and the communities who live and visit there, not to bend the law for a couple of extremely wealthy individuals.

"You can't take our relationship with the coast for granted, because it took a lot of sweat, blood and tears to preserve it so we have what we have today. These things didn't just

happen. The coast is what it is because a lot of people worked really hard and sacrificed to protect it. And if we want it to be there for our children, we have to keep fighting to protect it. In that way, the coast is never saved, it's always being saved."

- Peter Douglas, California Coastal Commission Executive Director 1985-2011

Sincerely,

Noel Gould

310-625-1157

[aquarianstudios@hotmail.com](mailto:aquarianstudios@hotmail.com)



Stacy Farfan <stacy.farfan@lacity.org>

## 1305 and 1307 Paseo del Mar - Grading

2 messages

Stacy Farfan <stacy.farfan@lacity.org>  
To: Sophie <Sophie@steenodesign.com>

Wed, Aug 9, 2017 at 10:43 AM

Good morning Sophie,

I wanted to ask you a clarification question on the amount of cut and fill and export and import you are planning on these homes. I know per your last set of updated plans the homes were sunken down a greater amount than the original submitted set of plans. I imagine this will require a greater amount of cut and fill and export/import. Please clarify, as this information is needed for the MND.

Best Regards,



**Stacy Farfán**  
DEPARTMENT OF CITY PLANNING  
West/Coastal/South Project Planning  
t.(213) 978-1369 | e.stacy.farfan@lacity.org  
200 N. Spring St., Room 721  
Los Angeles, CA, 90012

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Please consider the environment before printing this email.

Sophie <Sophie@steenodesign.com>  
To: Stacy Farfan <stacy.farfan@lacity.org>  
Cc: tom steeno <tom@steenodesign.com>, meliena <meliena@steenodesign.com>

Wed, Aug 9, 2017 at 3:25 PM

The current Cut and Fill rates are as follows:

Murthy 1307 W. Paseo Del Mar = Cut 751 c.y. and Fill 15 c.y.

Poola 1305 W. Paseo Del Mar = Cut 590 c.y. and Fill 5 c.y.

Please confirm receipt.

Thank you,

**SOPHIE STEENO, OFFICE MANAGER**

**STEENO DESIGN STUDIO INC.**

PH. 760.244.5001

www.SteenDesign.com

## COASTAL DEVELOPMENT PERMIT

ZONE CODE SECTIONS 12.20.2 prior to LCP certification.

The MASTER LAND USE APPLICATION INSTRUCTION SHEET-500' RADIUS should also be followed, except that a 100-foot radius map is required, and 6 copies of the site plan are required. The 100-foot radius starts across the street from the subject property.

- dual permit area
- single permit area

1. **CERTIFICATE OF POSTING.** When the Coastal application is accepted for filing, the applicant must post within 24 hours a **NOTICE OF INTENT** sign (sample attached) at a conspicuous place, easily read by the public, and as close as possible to the site of the proposed development. The notice shall indicate that an application for a permit for the proposed development has been submitted to the City Planning Department. The form to be used for the posting, as well as a statement of Certificate of Posting to be submitted after notice of intent is posted is attached. If the applicant fails to post the completed notice of intent form and sign the Certificate of Posting, the Department will withdraw the application and all processing will stop.

2. **GEOLOGY REPORT.** If the property is in a Hillside area, submit a certified Geology Report.

3. **PREVIOUS ACTIONS**

Has this property ever had an application submitted to the State Coastal Commission or the City of Los Angeles for Coastal approvals? Yes X No       

If yes, state the previous application number(s) 5-13-517

Describe on a separate page the facts (dates and determinations) of each of these applications.

4. **EXISTING CONDITIONS**

a. Existing use of land Residential

b. Number, type and approximate age of structures to be removed/demolished as a result of the project original home built in 1948

c. If residential units are being removed or demolished, indicate the number of units and monthly rent one, no rents

d. Is there any similar housing at this price range available in the area?  
Where? do not know

5. **TREES:** Number of existing trees more than 6 inches in diameter (show on plot plan) Ø

6. **TREES:** Number, size and type of trees being removed (show on plot plan) Ø

7. **SLOPE:** State percent of property:

7A 2013-3636



- ☒ X Less than 10% slope  
☐ 10-15% slope  
☐ Over 15% slope

If slopes over 10% exist, a topographic map will be required. If over 50 acres - 1"=200' scale.

8. Are there any natural or man-made **DRAINAGE CHANNELS** through or adjacent to the property? Yes \_\_\_\_\_ (show on plot plan) No X

9. **GRADING**

X 0-500 cu. yd. \_\_\_\_\_ 500-5000 cu. yd. \_\_\_\_\_ 5,000-20,000 cu. yd.  
 over 20,000 cu. yd., indicate number of cu. yd.

Import/export: Indicate the amount of dirt being imported or exported \_\_\_\_\_ cu. yd. Projects involving import/export of 1000 cubic yards or more are required to complete Haul Route Form.

amount of cut 95 cu yd.

amount of fill 35 cu yd.

maximum height of fill slope 0 ft.

maximum height of cut slope 2.5 ft.

amount of import or export export 60 cu yd.

location of borrow or disposal site to be determined

Grading and drainage plans must be included with this application. In certain areas an engineering geology report must also be included.

10. **ADOPTED COMMUNITY PLAN:** \_\_\_\_\_

Plan designation: ZONE RI-1AL Zone RI-1XL

11. **PRIVATE OR PUBLIC PROJECT:** private

12. **DETAILED DESCRIPTION OF PROJECT**

a. Residential:

Number of dwelling units: ONE

Type of ownership proposed:

☐ rental

☐ condominiums

☐ stock cooperative

1 single family

Number of bedrooms per unit:

one \_\_\_\_\_ two \_\_\_\_\_

three \_\_\_\_\_ four or more 4 TOTAL

b. Commercial, Industrial or Other





Stacy Farfan <stacy.farfan@lacity.org>

## FW: Blufftop Development in San Pedro

**meliena** <meliena@steenodesign.com>

Mon, Feb 27, 2017 at 2:37 PM

To: "Stacy Farfan (stacy.farfan@lacity.org)" <stacy.farfan@lacity.org>

Good Afternoon Stacy,

I received the following email from Shannon Vaughn with the Coastal Commission regarding the 25 feet setback regarding putting a concrete slab or pavers on the 25 feet setback.

Thank you, Meliena

**From:** Vaughn, Shannon@Coastal [mailto:Shannon.Vaughn@coastal.ca.gov]

**Sent:** Monday, February 27, 2017 2:06 PM

**To:** meliena <meliena@steenodesign.com>

**Subject:** Blufftop Development in San Pedro

Hi Meliena,

Thank you for your phone call. For blufftop development, the minimum setback for primary structures from the bluff edge is 25 feet. However, the minimum setback may be further restricted based on the findings of the geotechnical report. The geotechnical report must consider impacts to the development for 100 years. Given this consideration, all new development must be sited and designed so it does not rely on blufftop (or shoreline) protection. Development within the minimum required setback must be easily removable if it becomes subject to erosion or found to be unsafe due to geo conditions. I hope this helps. Please let me know if you have any other questions.

# Shannon Vaughn

## Coastal Program Analyst, South Coast District

California Coastal Commission

200 Ocean Gate, 10<sup>th</sup> Floor

562-590-5071

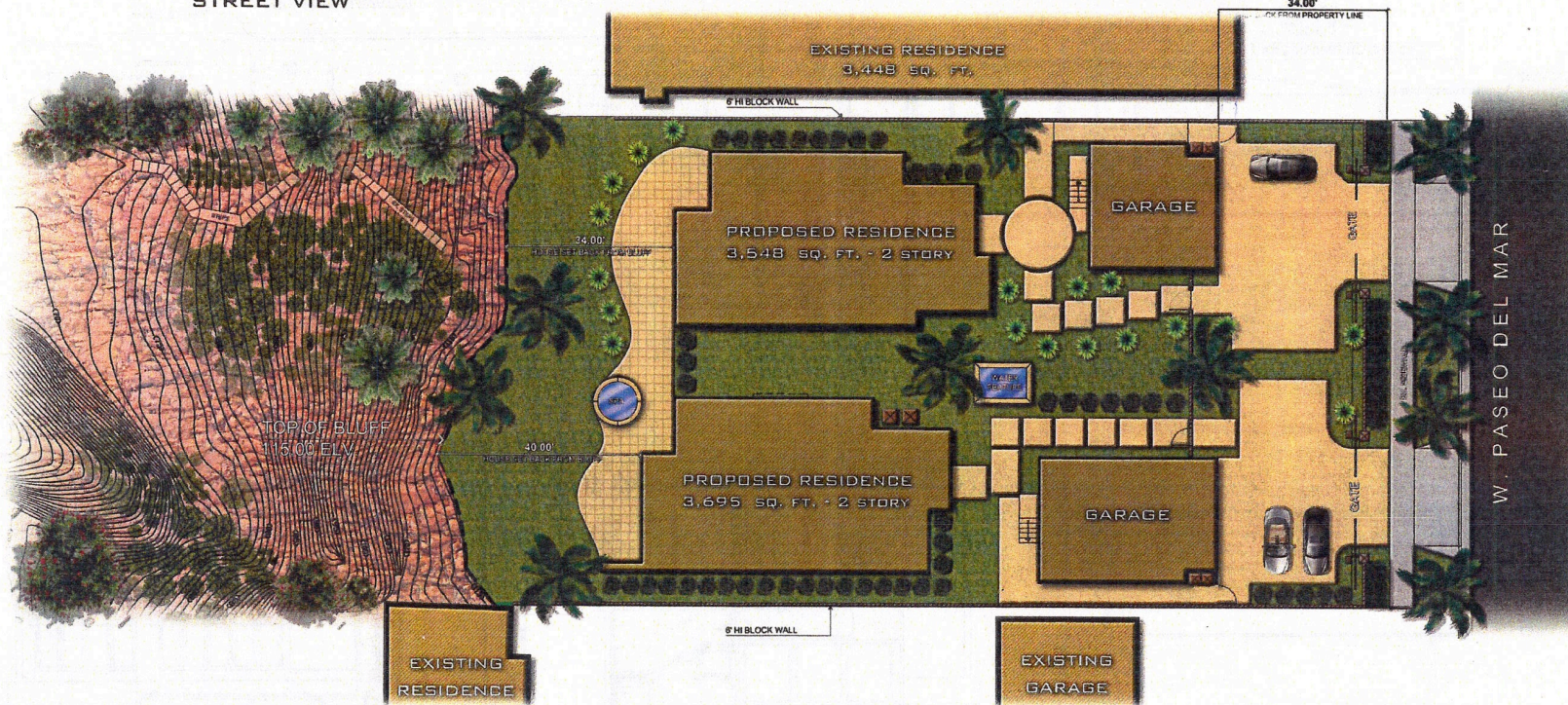
REC'D 5/3/2018



58' SETBACK FOR BOTH FROM CLIFFSIDE



STREET VIEW



POOLA / MURTHY RESIDENCE  
SAN PEDRO, CA JANUARY 2019

**STEENO**  
DESIGN STUDIO  
ARCHITECT

REC'D 1/20/19



Paseo del Mar Bluffs Square Footage Analysis

<u>Address on Paseo del Mar Bluff</u>	<u>Square Footage</u>	
	<u>House</u>	<u>Garage</u>
1481	3,656	520
1479	865	0
1475		0
1471	3,410	520
1467	1,776	400
1461	1,406	400
1459	1,748	0
1457	1,012	400
1451	816	0
1441	2,730	400
1431	1,185	400
1427	1,321	400
1421	1,333	400
1417	1,640	400
1411	1,375	400
1407	1,129	400
1401	900	400
1375	1,399	0
1371	2,188	360
1365	3,336	400
1355	1,809	0
1351	1,432	360
1327	2,198	400
1321	1,245	400
1317	0	0
1311	2,840	520
1307	1,302	150
1305	0	0
1227	954	520
1221-1223	1,298	400
1217	1,964	400
1211	2,400	520
1207	1,096	400
1201	378	400
1177	1,013	0
1171	1,150	400
1167	1,632	0
1161	1,217	132
1153	2,630	400
1151	1,689	380
Total square footage on bluff	61,472	11,982
# lots	38	38
average square footage/existing baseline	1,618	315 (Mean = 400)
Total square footage on bluff	61,472	11,982
Demo existing	-1,302	-150
Original proposed	4,278	921
Original proposed	4,385	661
	68,833	13,414
# lots	38	38
average square footage/new baseline	1,811	353
Percentage increase in baseline as originally proposed	11.97%	11.95%
Total square footage on bluff	61,472	11,982
Demo existing house	-1,302	-150
Revised proposed	3,695	921
Revised proposed	3,548	661
	67,413	13,414
# lots	38	38
average square footage/baseline	1,774	353
Percentage increase in baseline as revised	9.66%	11.95%
Total square footage on bluff	61,472	11,982
Demo existing	-1,302	-150
Maximum new	2,300	400
Maximum new	2,300	400
	64,770	12,632
# lots	38	38
average square footage/baseline	1,704	332
Reasonable percentage increase in baseline	5.37%	5.42%

EXHIBIT B

**From:** [Noel Gould](#)  
**To:** [Vaughn, Shannon@Coastal](#)  
**Cc:** [Lee, Vince@Coastal](#); [Stevens, Eric@Coastal](#); [Hudson, Steve@Coastal](#); [Ainsworth, John@Coastal](#); [Mark](#); [Robin Rudisil](#)  
**Subject:** Southland Cliffs on losing end of sea level rise RE 1305 & 1307 W. Paseo del Mar  
**Date:** Friday, December 3, 2021 3:49:32 PM  
**Attachments:** [Southland Cliffs are on losing end of rising sea.pdf](#)

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Hi Shannon and Vin,

This article discusses the likelihood, according to the USGS, that we can expect 135 feet of cliff erosion in less than 80 years, which if it occurs, would wipe out both projects at 1305 and 1307 W. Paseo del Mar.

It's a worthwhile read, and please consider it part of our submissions, although I believe you may have it somewhere already.

By the way, we're available to talk if you have thoughts or questions regarding ways to make these projects more sensible and conforming to the community character of the area.

Cheers!  
Noel  
310-625-1157

PS. Also you still have time to postpone this hearing in order to work with the community to find a pathway forward through which we would be in support of two houses here, and that would be a win-win for everyone and demonstrate your ability to skillfully navigate complicated situations such as ours.





WALLY SKALIS Los Angeles Times

**MAUREEN SASSOON** hikes in Rancho Palos Verdes. A study examined cliffs from San Diego to Point Conception to project the rate of bluff erosion by 2100, which could severely affect homes, parks and facilities.

# Southland cliffs are on losing end of rising sea

They could recede by more than 130 feet by 2100, study says

BY ROSANNA XIA

It's not just beaches and sand that are disappearing as the ocean pushes inland. Sea level rise is also eating away at California's coastal cliffs.

The question is by how much, as Californians have heavily developed and continue to build along the edge of the Pacific.

Scientists are now one step closer to projecting how these bluffs will fare this century — and the outlook is sobering. In Southern California, cliffs could recede more than 130 feet by the year 2100 if the sea keeps rising, ac-

## Projected cliff erosion in Malibu

Cliffs at Point Dume could recede dozens of feet as the sea rises, according to a new study. The projection by 2100:



Sources: U.S. Geological Survey, Google Earth

ELLIS SIMANI Los Angeles Times

According to a new study led by the U.S. Geological Survey.

"It's a pretty big number," said Pat Limber, a coastal geomorphologist and lead author of the study. "Hopefully this model will give coastal managers a broad-scale picture of how the cliffs might respond to sea level rise, so that they can start planning for the future."

The consequences of this erosion could be severe on major roads along the Palos Verdes Peninsula. In Malibu and other coastal cities, blocks of homes, parks and public facilities could be lost to the sea under such projections.

[See Cliffs, A8]

LA Times 6-27-18

LA Times

130'  
by  
2100



[Cliffs, from A1]

These forecasts could help provide a road map for the daunting decisions that coastal communities must confront sooner rather than later.

Evacuating — and then coming back to — cliff tops hammered by the ocean have become par for the course in towns such as Pacifica and along Highway 1, which was buried last year in a landslide south of Big Sur and then rebuilt atop the debris.

From San Diego County to Santa Cruz, local disputes have intensified over how many more sea walls to build to fend off rising waters — and who will pay to maintain them each year. Others have debated whether to let go, move farther inland and allow Mother Ocean to have her way.

The study uses a sophisticated model that synthesizes existing data and conclusions on how sea level rise could affect these defining features of California's coast. Its findings establish a more concrete time frame for communities in the southern part of the state as they grapple with what to prioritize.

"This is a significant amount of erosion, and it's something that we need to be preparing for now, not later," said Heather Cooley of the Pacific Institute, an Oakland-based think tank that has studied the socioeconomic effects of sea level rise in California. "We're talking about very high-value real estate — there's private properties, there's public infrastructure, we have roads, we have treatment plants, there's even consideration of building desalination plants in some of these areas. All of those facilities would be at risk from this erosion."

The USGS study, published this month in the *Journal of Geophysical Research: Earth Surface*, ex-

## Projected cliff erosion in Palos Verdes Peninsula

By the end of the century, cliffs like the ones along the Palos Verdes Peninsula could erode an average of 62 to 135 feet depending on how much the sea rises.



Sources: U.S. Geological Survey, Google Earth

ELLIS SIMANI Los Angeles Times

amined cliffs from San Diego to Point Conception. Using sea level rise scenarios ranging from 0.5 to 2 meters (1.6 to 6.6 feet), researchers stitched together five previous models — incorporating their varying uncertainties and assumptions, as well as historical erosion rates — and ultimately reached a consensus that the cliffs will erode on average 19 to 41 meters (62 to 135 feet) by the end of the century.

"We tried to tie in the uncertainties as plainly as possible," Limber said, "so that we can better communicate it to the people who are using this information."

He noted these projections might even be on the conservative end, given that California policymakers are now considering 3 meters as the higher end of expected sea level rise.

Oceanfront property owners often react to the threat of erosion by armoring the coast with sea walls or temporary rock walls — about one-fifth of Southern California's coastline is al-

ready armored and that proportion is likely to grow, the study noted. But increased protection prevents the cliffs from eroding and providing the natural supply of sand to beaches. It also enables more development in already vulnerable locations, which, in turn, further increases the risk.

Reinforcement also fixes the cliff in place, so as the sea level rises, the beach in front gets submerged because it cannot migrate inland. This coastal squeeze is already happening. A study last year by the same USGS team projected that up to two-thirds of Southern California's beaches could disappear by 2100 because of similar pressures from rising water and human interruptions to sediment flow.

Coastal managers thus face the difficult decision of prioritizing either private property or public beaches by permitting or prohibiting cliff armoring. Further research on how beach cliff systems respond to climate change, Limber said, would

help improve the forecasting tools needed to make these kinds of choices.

Like hurricane and climate forecasting, projecting how much erosion will accelerate due to sea level rise, while inherently difficult, is in increasing demand. Better data to feed into these models will also lead to forecasts with greater certainty.

"This particular method, the idea of using multiple models, is a really nice step forward," said Adam Young, a project scientist at the Scripps Institution of Oceanography who has spent years collecting data on cliff erosion in California. "There are a lot of different models out there and it's hard to say which one is best. By looking at all of them, it really gives you a sense of where the future may be."

Cliffs are particularly difficult to study because they tend to erode slowly over time, punctuated with sudden losses from landslides or collapse during a storm. The strength of the rock, cliff height, sediment composi-

cliffs to erode 62-135 by end of century





**POINT DUME** Nature Preserve in Malibu. Findings from the study establish a time frame so that Southern California communities get a broad-scale picture of how the cliffs might respond to sea level rise, helping officials and residents plan for the future.

ALLEN J. SCHABEN Los Angeles Times

## 'We need to be preparing for now'

tion, the slope of the beach, the slope of the seafloor, wave action, human intervention and other variables come with their own uncertainties.

And scientists often think in averages, experts note, which has been a challenge when talking about cliff erosion and other climate change issues. Stretched over a long period of time, an average — however extreme the changes may be — might not sound like much. But the overall change can be vast.

Losing an average of 17 feet of cliff per year over 80 years, for example, might not sound as urgent as losing 135 feet by the end of the century.

Patrick Barnard, research director of the USGS Climate Impacts and Coastal Processes Team and a co-author of the study, said forecasts can help communities better understand their risks and the consequences of their decisions.

"However you manage the coast, there's going to be ramifications," said Barnard, whose team is wrapping up projections for the Central Coast and will work on Northern California next.

Environmental decisions, of course, aren't just made at the local level. As the Earth continues to get warmer and land ice continues to melt into the ocean — in large part fueled by human-produced greenhouse gases — efforts to rein in these emissions could play a role in how fast the sea will rise. The model itself shows a range of erosion from 62 to 135 feet, illustrating the effects of choices to be made this century.

"There's a range here, where it's not as bad under lower sea level rise projections," said Cooley of the Pacific Institute. "We have to get serious about reducing greenhouse gas emissions."

rosanna.xia@latimes.com



**From:** [Noel Gould](#)  
**To:** [Lee, Vince@Coastal](#)  
**Cc:** [Vaughn, Shannon@Coastal](#); [Stevens, Eric@Coastal](#); [Robin Rudisil](#); [Mark](#)  
**Subject:** question about Staff Community Survey for 1305 and 1307 W. Paseo del Mar  
**Date:** Thursday, December 9, 2021 1:37:22 PM

---

Hi Vin,  
In reviewing your Staff Community Survey where you collected the square footage of the houses on the Paseo del Mar bluff, we added the total of the square footage and divided by 37 properties and came up with an average square footage of 1,639, but you indicate 2,172.50.

We're curious if this was simply a mathematical error or if you calculated it differently.

Please let us know.

Cheers!  
Noel  
310-625-1157



---

**From:** mark severino <msevs@earthlink.net>

**Sent:** Friday, December 10, 2021 12:32 PM

**To:** SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>; Vaughn, Shannon@Coastal <Shannon.Vaughn@coastal.ca.gov>; Stevens, Eric@Coastal <eric.stevens@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; Brownsey, Donne@Coastal <donne.brownsey@coastal.ca.gov>; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>; Mark.Gold@coastal.ca.gov <Mark.Gold@coastal.ca.gov>; Mann, Zahirah@Coastal <zahirah.mann@coastal.ca.gov>; Faustinos, Belinda@Coastal <belinda.faustinos@coastal.ca.gov>; Luce, Shelley@Coastal <shelley.luce@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Rivas, Rick@Coastal <rick.rivas@coastal.ca.gov>; Aguirre, Paloma@Coastal <paloma.aguirre@coastal.ca.gov>; Mandelman, Rafael@Coastal <rafael.mandelman@coastal.ca.gov>; Morales, Maricela@Coastal <Maricela.Morales@coastal.ca.gov>; Diamond, Francine@Coastal <francine.diamond@coastal.ca.gov>; Matt@sdcoastkeeper.org <Matt@sdcoastkeeper.org>

**Cc:** Penelope <penmcknz@aol.com>; Lorna Wallace <lornawallace@hotmail.com>; George Wallace <geowall440@gmail.com>; Wayne Widner <cwwidner@cox.net>; Mike Allison <orcamike@outlook.com>; Jennifer Grasso <aquawoman345@gmail.com>; Kathleen Martin <pedrogael@gmail.com>; clester99@comcast.net <clester99@comcast.net>

**Subject:** W 14b/15a and W 14c/15b (San Pedro)

December 9, 2021

From: Mark Severino  
Homeowner at 1311 Paseo Del Mar, San Pedro, CA 90731

Re: California Coastal Commission Application numbers:  
A-5-SNP-19-0136 & 5-20-0153 and A-5-SNP-19-0154 & 5-20-0152  
1305 Paseo Del Mar and 1307 Paseo Del Mar, San Pedro CA 90731

Honorable Commissioners:

I am writing to raise issues with the California Coastal Commission's Staff Report concerning two proposed developments at 1305 and 1307 Paseo Del Mar, in San Pedro. I am the homeowner of 1311 Paseo Del Mar, San Pedro, CA 90731 - directly adjacent to the subject lot at 1307 Paseo Del Mar.

I have owned my home here in San Pedro for almost nine years, and I have grown to love this community, my neighborhood, and the truly unique and eclectic place that I have grown to love more and more with each passing year. Since moving to California in 1974 as a ten-year-old kid, I have spent most of my time in Santa Monica and Venice Beach, and have watched the gentrification of those areas, and sadly, the loss of the once unique and special characteristics of those communities be lost to rampant over-development. That is what initially drew me to San Pedro. I felt that vibe once again, and it felt like home. I had the good fortune to once again find that special, unique old-school place along the Southern California coast that I so love, and longed to find again. Whether it's walking out my front door to walk the dogs along Paseo to the Point Fermin Lighthouse, or stopping in at The Corner Store to have a cup of coffee and chat with neighbors, this is a neighborhood unlike anything else in southern California in so many ways. Heck, when we first moved in almost nine years ago our neighbors had a "welcome to the neighborhood" party at their home so we could meet everyone. Where else does that happen in Los Angeles?!?

These are among the many reasons I am committed to fighting with all my faculties to save San Pedro from the same fate that has befallen both Santa Monica and Venice Beach. This is one of the last bastions of Southern California coastal communities to still exist in its nascent form, which, thankfully, thus far has been protected from the influence of big money developers and deep pocketed individuals bending the rules to subvert the much needed guardrails imposed by the Coastal Commission to ensure the preservation of this extraordinarily unique community.

For years, I and numerous other homeowners and residents of the neighborhood have been actively expressing our objection to these two proposed developments based on a number of issues; their incompatibility with the surrounding properties in terms of mass, scale and character; the misrepresentations of the surrounding area and homes by the applicant; and the massive discrepancies in the amount of soil removal between the amounts represented in their application(s), and the actual amount now being proposed.

As currently proposed, these two homes would be the two largest structures EVER constructed along the South (ocean-facing bluff side) of Paseo Del Mar by a significant amount. The proposal calls for 1307 Paseo Del Mar to have a main living structure of 3548 square feet with a 665 square foot detached garage - a total mass of 4213 square feet - plus another 1124 square feet of roof deck. The current proposal for 1305 Paseo Del Mar to have 3695 square feet of main living space, a 921 square foot garage - a total mass of 4616 square feet - plus an additional 1154 square feet of roof deck. Even without the additional square footage of the garages and roof decks, the main houses alone would be the largest structures ever built along this stretch. Add to that the fact that the two structures have such similar architectural styles, and a 6-foot tall common wall across the front of both of the homes, that the end result is to create the visual equivalent of a massive compound, not two separate homes on two adjacent lots. This is not what our neighborhood looks like, and is not compatible with the character of our community. Of the 38 homes along the bluff, only 8 are two-story, with all the rest being single-story. And all 8 of those two-story structures are built considerably further back from the bluff edge, with setbacks of approximately 75 feet. In fact, there are currently only three houses along the bluff side of Paseo Del Mar that are larger than 3000 square feet, with 25 of the homes between 800 and 2000 square feet. The 921 square foot garage proposed for 1305 Paseo Del Mar alone is larger than 5 of the existing houses!

I would also like to mention that there are no other homes along this stretch that have roof decks. Why would one need a roof deck on their property when the lots are on top of an approximately 120-foot high bluff overlooking the Pacific Ocean and Catalina Island. Just walk out your door and you have all the views you could possibly want without having to get on top of your roof to enjoy them. Roof decks in this area are simply a perch from which to impose upon the privacy of one's neighbors, and are again, not compatible with the character of this neighborhood. Furthermore, it was always my understanding that a roof deck, or "mezzanine" counts as a story - that would make these two proposed homes three-story, which I know to be not allowed by the San Pedro Specific Plan.

While I firmly believe all of the above issues need to be addressed before these projects are to be approved, I want to make it clear that I am not against the rights of these applicants to build on their property. What I am against is them pushing through proposals that do not conform to the existing neighborhood character in terms of mass, scale and character, and are not based on true representations of the facts regarding that neighborhood. These homes are massive, and completely out of character of the surrounding neighborhood which consists of a variety of styles, but none that are giant modern monoliths of steel and glass. If the applicants were proposing a single-story traditional home (like mine), I wouldn't object at all. But what they seem to want is a home more suited to Santa Monica, Venice Beach, Manhattan Beach or Palos Verdes. San Pedro has a very different character, and is absolute antithesis of those neighborhoods, and what we, as residents of this area, are most concerned about is projects like this setting a new precedent that will allow for more and more out-of-scale and out of character development that will permanently and irrevocably alter this incredibly special and unique neighborhood.

The staff report claims that the proposed structures are somehow compatible with the surrounding properties in mass, scale and character. But how can that be if they are the two largest? To be clear, we did an analysis of ALL the existing homes on the bluff side of the street, and, according to our calculations, the average size of all 38 existing homes is around 1600 square feet, with the largest being 1471 Paseo Del Mar, which is approximately 3410 square feet. I recently received a copy of the Coastal Commission Staff's own Community Survey (which omits the applicants existing structure at 1307 Paseo Del Mar), with data collected from LandVision, dated November 10, 2021, that has similar findings to our own data, with the conclusion of an average square footage of 2172.50 square feet, and no homes larger than the 3410 square feet mentioned above (see attachment 1). Upon double checking the math, it was found to be in error, with the actual average square footage being 1639 square feet, not 2172.50.

I take issue with the way the applicant, and now the Coastal Commission staff, have justified the square footage of the two proposed projects being compatible with the surrounding structures. In an attempt to provide comparable properties, the staff report (on page 16 of both the report for 1305 and for 1307) cites three surrounding properties to establish a baseline for mass and scale. The problem is that all three of the comps provided are either inapplicable, or flat-out misrepresentations.

The exact language on page 16 is:

According to the Los Angeles County Assessor data, the property to the north is a single-family dwelling measuring 4,405 square feet; the property next door to the west is also a single-family dwelling measuring 3,448 square feet, and the property to the east at 1305 West Paseo Del Mar is vacant and there is a proposal for a 3,695 square-foot development under ZA-2013-3632-CDP-MEL-1A.

The problem with this analysis is that the property to the North cited is across the street on the North side of Paseo Del Mar, and therefore does not apply as it is not on the bluff. As per a letter from Eric Stevens, Coastal Program Analyst for the California Coastal Commission, to the applicants'



architect, Mr. Thomas Steeno dated May 14, 2021 (page 1, paragraph 6), only the bluff fronting homes (i.e. homes along the South side of Paseo Del Mar) should be considered in determining what is “consistent with the community character of the area.” (see attachment 2 - highlighted portion) The third property referenced above is the sister proposed development - in other words they are using a house that DOES NOT CURRENTLY EXIST as a comp to justify the mass and scale of the proposed property. The applicants then use the same erroneous tactic for the proposed home at 1305 Paseo Del Mar referencing the house on the West side of the street (which is inapplicable as it is not on the bluff), an incorrect square footage of my house (see the paragraph below), and the sister project at 1305, which again DOES NOT CURRENTLY EXIST.

Now we get to the second property referenced above as, “the property next door to the West.” That is in fact my house at 1311 Paseo Del Mar. For years the applicants and Mr. Steeno, have claimed my house to be 3448 square feet. I have disputed this claim repeatedly, as I had always thought it to be around 3000 square feet. To rectify this discrepancy, I called the LA County Assessor’s office, and had an Assessor come to my property to do a site survey and in-person measurement. On June 12, 2019, Mr. David Weakly, came to my home to perform that survey. He found the total to be 3201 square feet. Attached to this letter, please find official documentation from the Assessor’s office, with the Assessor’s stamp on it to verify its authenticity and the correct square footage of 3201 (see attachment 3).

I bring this particular issue up for two reasons. First, even after the correct square footage of my house has been established and entered into the public record, Mr. Steeno and the applicants have continued to misrepresent the actual square footage of my home as use it as justification for the square footage they are trying to push through, going as far as to include that erroneous number on their renderings of the proposed structures. This is yet another example of their long-standing pattern and practice of misrepresenting material facts to mislead any agencies or persons in positions of authority to make decisions about their proposed projects.

This pattern of behavior literally dates back to their original permit application in 2013 in which they state that there are no trees on the property larger than 6” in diameter, when in fact, there are three magnificent palm trees that are all at least 3 feet in diameter. What is really worrisome, beyond the factual misrepresentation in the 2013 permit application that the three palm trees even exist, is that this is exacerbated by the Tree Report letter from LandArq, Inc (submitted by Fausto A. Reyes, the landscape architect hired by the applicants), dated August 8, 2017 (see attachment 4), in which Mr. Reyes claims those palm trees to be “Trees of Heaven” (*Ailanthus altissima*). In his letter, Mr Reyes claims that, “The Trees of Heaven” are considered a weed or nuisance tree and should be removed...” But when I googled that Latin name, those palms are NOT the trees he claims them to be (see attachment 5). Is this yet another misrepresentation intended to allow them to remove those palm trees by claiming them to be what they are not? Those trees and their root systems are an essential contributing factor to the stability of the bluff edge, and are a nesting habitat for a number of the various protected raptor species that inhabit the bluff. Those three magnificent palm trees should not be touched!

The second reason I raise this issue is the fact that the Coastal Commission staff has used the square footage values presented by the applicants, WITHOUT doing their own due diligence to verify those values are correct, especially because this applicant has a history of manipulating numbers to achieve their goals. This assertion is given further credence by the existence of the staff’s own Community Survey, dated November 10, 2021, that shows my home at 1311 Paseo Del Mar at its correct square footage of 3201. So why then does the Staff Report dated December 3, 2021 still contain the misrepresented square footage of 3448? It is my contention that the staff findings be re-evaluated to represent what is true rather than what the applicant would like to be true.

Then there is the issue of soil removal, cut and fill. From their original permit application to the city

in 2013 (ZA-2013-3636) for 1307 Paseo Del Mar, the applicants specify 95 cubic yards of cut, and 35 cubic yards of fill, with 60 cubic yards of soil to be exported. For 1305 Paseo Del Mar, the application specifies 255 cubic yards of cut and 15 cubic yards of fill, with 240 cubic yards to be exported. That's a total of 350 cubic yards of cut, 50 yards of fill, and 300 cubic yards to be exported. Compare this to an email dated August 9, 2017, from Ms. Sophie Steeno at Steeno Design, sent to Ms. Stacy Farfan at LA City (see attachment 6), in which Ms. Steeno specifies 751 cubic yards of cut and 15 yards of fill for 1307 Paseo Del Mar, and 590 cubic yards of cut and 5 yards of fill for 1305 Paseo Del Mar. That's a total of 1341 cubic yards of soil to be cut when the application calls for a total of 350. That's an increase of nearly 4 times the amount originally proposed.

What is all this proposed soil removal for? Are they intending to remove dirt NOT related to the caissons for the purpose of lowering the existing grade to start their foundation at a lower point? I raise this question because when one looks back at their original plans, they called for structures that were over 28-feet high. The more recent plans show a 26-foot tall structure as that is the height limit allowed. Do they intend to lower the existing grade by removing two feet of soil to accommodate the actual height of their proposed structures to circumvent that height limit? If so, I believe that is a serious concern as it would severely impact natural drainage and could contribute to accelerated erosion along an already unstable area.

Then there is the issue of an existing storm drain on the Eastern side of 1305 Paseo Del Mar. That storm drain has with it an easement that would preclude a developer from building over the top of it, yet in none of their correspondence has that issue been addressed. In fact, the current plans for the proposed structure do not take that easement into account. Surely there would need to be a modification of the plans to take the existence of that storm drain and the easement related to it into account.

What I ask is that this hearing be continued and that the projects be re-evaluated, and at the very least scaled back in mass and scale as to minimize the adverse, cumulative impact on the surrounding homes, including the impact of the drilling needed to install the three soldier piles/caissons specified at 4.5 feet in diameter and 70-feet deep to support each of the proposed structures.

In Summary, these are my (and those of many of my neighbors) main concerns:

1. The projects are not compatible with the community character in terms of scale, mass and character of the surrounding neighborhood.
2. The projects have been pushed along through a series of misrepresentations and false claims by the applicants.
3. The extreme increase in the amount of soil to be removed and the impact of such a large-scale removal as to permanently alter drainage, and therefore cause inherent instability of the bluff.
4. The projects will set new precedents and give other developers a credible argument to receive the same exemptions, leading to potential over development of the area and an irreparable change to community character.
5. Roof decks which are out of character for the neighborhood (and that technically count as a third story).

Thank you for your consideration of the above-mentioned concerns and issues. I would be happy to speak with anyone who would like any further clarity of these thoughts, or if there are any questions.

Sincerely,

Mark Severino  
msevs@earthlink.net



## Staff's Community Survey\*

Address (W Paseo del Mar)	Building Area (sq. ft.)	Year Built
1151	1689.00	1941
1153	2630.00	1962
1161	1217.00	1947
1167	1632.00	1970
1171	1135.00	1935
1177	1013.00	1961
1201	378.00	1955
1207	1096.00	1939
1211	2400.00	2010
1217	1964.00	1946
1221	1298.00	1946
1227	954.00	1937
1311	3201.00	1950
1321	1245.00	1949
1327	2198.00	1947
1351	1432.00	1948
1355	1809.00	1970
1365	3336.00	1916
1371	2188.00	1956
1375	1399.00	1949
1401	900.00	1929
1407	1129.00	1951
1411	1375.00	1951
1417	1640.00	1940
1421	1333.00	1940
1427	1321.00	1941
1431	1821.00	1942
1441	2730.00	1975
1451	816.00	1947
1457	1748.00	1956
1459	1012.00	1963
1461	1406.00	1943
1467	1776.00	1960
1471	3410.00	1981
1479	865.00	1964
1481	512.00	1956
1481	2656.00	1926

Average square footage: 2172.50

\*Data acquired from LandVision on 11.10.2021

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
301 East Ocean Blvd., Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071

Date 5/14/2019Re: Application/Appeal No 5-19-0325**STATUS LETTER**

The status of this matter is noted below.

       Your application was filed on \_\_\_\_\_.  
The public hearing is tentatively scheduled on \_\_\_\_\_  
in \_\_\_\_\_. This tentative scheduling information is being provided for  
your convenience and is subject to change. Written notification of final  
scheduling of the application, along with instructions on how to obtain a copy of  
the staff report, will be mailed approximately 10 days prior to the hearing.  
**IMPORTANT:** The enclosed Notice of Pending Permit must be posted on the  
site, in a conspicuous place, within 3 days of its receipt.

       This application is incomplete and cannot be filed or processed until the  
items listed on the attached sheet have been completed and submitted to the  
District Office. If these items have not been received by the date indicated, the  
entire package will be returned to you.

Please be advised that the items needed to complete your application must be  
submitted to this office by \_\_\_\_\_.

  x   This file is being returned as the application submitted is deemed incomplete.  
The required substantive documents are missing. Please see the attached  
sheet.

       This appeal was received \_\_\_\_\_ and has been determined  
to be a valid appeal. You will be notified of the place and date of the public  
hearing.

       This appeal was received \_\_\_\_\_ but has been determined  
invalid for the following reason:

\_\_\_\_\_  
\_\_\_\_\_  
If you have any questions, please contact this office at (562) 590-5071.

Staff Analyst Eric Stevens

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
301 East Ocean Blvd., Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



May 14, 2019

May 14, 2019

Thomas Steeno  
Steen Design Studios  
11774 Hesperia Road #B1  
Hesperia, CA 92345

Re: Application Rejection, CDP Application No. 5-19-0325, 1305 West Paseo Del Mar, San Pedro

Dear Mr. Steeno:

Commission staff has reviewed the materials submitted with Coastal Development Permit (CDP) application No. 5-19-0325 and determined that the application was submitted prematurely and must be rejected. The CDP application proposes to construct a new 3,695 sq. ft. 2-story single family residence with a new detached 760 sq. ft. garage on a 21,086 sq. ft. blufftop lot at 1305 West Paseo Del Mar in the San Pedro planning area of the City of Los Angeles.

Staff has determined that the application must be rejected because the appeal period for this project has not started. Staff has not received the Notice of Final Action (NOFA) letter from the City. Once staff receives the NOFA, and if the NOFA letter has been submitted correctly and with all of the required documentation, staff will start the 20-working day appeal period for the project. An application for a CDP from the Commission will be accepted once the appeal period has ended. The application is also being rejected because it did not include plans stamped approved by the City of Los Angeles.

In addition to the items above, the following should be included with a new application submittal:

Please provide copies of all City staff reports and any written public comments related to the project during the City review of the application, including during the local appeal process.

The submitted plan set did not include plans showing the foundation. Please submit a detailed foundation plan for the proposed structure.

**In order to ensure that the proposed home is consistent with the community character of the area, please provide a visual streetscape analysis of the bluff fronting homes nearby the subject site.**

This project also raises various concerns related to determination of a safe setback from the bluff edge, construction of shoreline armoring to provide stability for a structure constructed after the Coastal Act, future response to bluff erosion, the ability to remove portions of the home in the event of endangerment, protection of public coastal views, use of non-native landscaping, and potential unpermitted development on the bluff face.



**CALIFORNIA COASTAL COMMISSION**

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Long Beach, CA 90802-4302  
(562) 590-5071



May 14, 2019

As detailed in the submitted geotechnical reports, the project site is located in a hazardous area that is subject to bluff erosion and instability. The Coastal Act prohibits new development that will require shoreline protection. Thus, new homes in hazardous areas must be set back far enough inland from the bluff edge such that they will not be endangered by erosion (including sea level rise induced erosion) over the life of the structure, without the use of a shoreline protective device, including a deepened caisson foundation. The Commission considers caissons to be a form of shoreline protection. Caissons require landform alteration and typically become exposed over time in the same manner as upper bluff protection structures. Thus, new development must not rely on caissons to assure structural stability nor to determine a safe bluff setback that would achieve the minimum required factor of safety of 1.5. Rather, the home should be sited as far back as necessary to be safe over the life of the structure, even if that means redesigning the footprint of the house, and/or reducing the required front yard setback.

Provide an updated site plan showing the location where new development would have to be sited in order to assure stability and structural integrity and not be in danger from erosion over a period of 75 years. This setback must be determined by combining the setback necessary to assure the stability of the slope against sliding in the present day (1.5 FOS) with an additional setback to account for the future retreat of the bluff over the proposed home's design life, typically assumed to be 75 years. The estimated erosion rate should account for likely increases to the rate of erosion resulting from Sea Level Rise.

In order to avoid the need for shoreline armoring in the future, plans and specific triggers for removal or retreat of the proposed development should be included with the project submittal. Please include a removal plan for the proposed home if it is threatened by bluff erosion or instability during its design life.

The subject site is located directly between a public coastal road and the ocean. The Commission has found it important to preserve views to prevent a walling-off effect of the coast. View corridors should be created in the north and south side yards of the proposed home. To preserve public views from the street, landscape materials within the view corridors should be species with a growth potential not expected to exceed 3 feet at maturity and all proposed landscaping in these yard areas should be maintained at a height of 3 feet or lower (including raised planters). Furthermore, any fencing or gates within the side yard setbacks should permit public views and have at least 75% of its surface area open to light. Please submit a revised landscaping and fencing plan that provides for public views of the coast along the property side yards. In addition, please also confirm that only native, drought-tolerant, non-invasive plants are proposed as part of the landscaping plan.

Commission staff has conducted a search of available records and has been unable to locate a permit for the private bluff stairway shown on the project plans. Thus, the existing stairway may be unpermitted and if so, should be removed as part of this project. If the applicant is unable to either provide evidence that the stairway was constructed and not significantly altered since enactment of the Coastal Act (January 1, 1977) or that a CDP was issued for the stairway, staff recommends that the applicant include a proposal to remove the stairway in conjunction with the proposal to construct the new home on the subject site.

## CALIFORNIA COASTAL COMMISSION

South Coast Area Office  
301 East Ocean Blvd., Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



May 14, 2019

Please submit all information in a physical and digital form with the resubmittal of this application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Stevens'.

Eric Stevens  
Coastal Program Analyst

(Y:\E Files for CDP Applications\2019 E Files for CDPs\5-19-0325 1305 W. Paseo Del Mar San Pedro\Prehearing Correspondence\Application Rejection Letter 2019 05 14.docx)

# SKETCH/AREA TABLE ADDENDUM

Parcel No 7470-031-004

Property Address 1311 W PASEO DEL MAR

City SAN PEDRO

State CA

Zip

Owner

Client

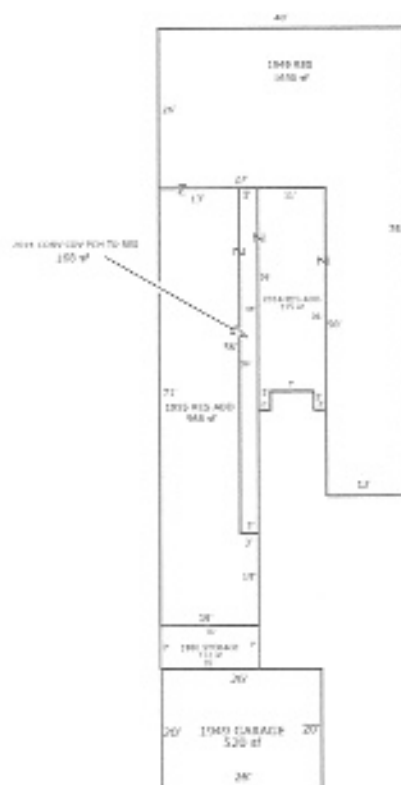
Appraiser Name D.WEAKLEY

Inspection Date 20190512

SUBJECT

IMPROVEMENTS SKETCH

AREA CALCULATIONS



Scale: 1" = 30'

## AREA CALCULATIONS SUMMARY

Code	Description	Factor	Net Size	Perimeter	Net Totals
GLA.1	1949 RES	1.00	1690	232	
	1955 RES ADD	1.00	968	174	
	2014 CONV COV PCH TO RES	1.00	168	118	
	2014 RES ADD	1.00	375	100	3201
GAR	1949 GARAGE	1.00	520	92	520
CUST	1986 STORAGE	1.00	112	46	112

COUNTY OF LOS ANGELES  
OFFICE OF THE ASSESSOR  
SOUTH DISTRICT  
1401 E. WILLOW ST.  
SIGNAL HILL, CA 90755-3543  
(562) 256-1701

Net LIVABLE Area (rounded w/ factors)

3201

## Comment Table 1

## Comment Table 2

## Comment Table 3



LANDARQ, INC.  
865 S. MILLIKEN AVE., SUITE E

CA License #4175  
ONTARIO, CALIFORNIA 91761

Date: 8/8/2017

Fausto A. Reyes, Landscape Architect  
865 S. Milliken Ave. Suite E, Ontario, CA

Office (909) 259-9428

Email: fausto@landarq.com

**Reference: APN#: 7470-031-006, 1305 W. Paseo Del Mar, San Pedro, CA**

**Tree Report Letter**

**Attn:** DEPARTMENT OF CITY PLANNING-West/Coastal/South Project Planning

This Tree report/letter is to provide my professional review and opinion as a registered Landscape Architect in the State of California. CA Lic.# 4175

In reference to the Site noted above, we found no significant major Trees except for the:

**Canary Islands Palms- *Phoenix canariensis*- (2) each total.**


**Tree-of-heaven- *Ailanthus altissima* – (3) each total.**

These palms will not impacted by new bldg. footprint, therefore we recommended a cleaning and skinning and to be protected in place.

The tree of heaven trees are considered a weed or nuisance tree and should be removed with disposed off site, in a green recycling center.

Please feel free to contact me if have any questions.

Sincerely,

  
Fausto A. Reyes, Landscape Architect  
CA. Lic # 4175  
LandArq, Inc.





Stacy Farfan <stacy.farfan@lacity.org>

## 1305 and 1307 Paseo del Mar - Grading

2 messages

Stacy Farfan <stacy.farfan@lacity.org>  
To: Sophie <Sophie@steenodesign.com>

Wed, Aug 9, 2017 at 10:43 AM

Good morning Sophie,

I wanted to ask you a clarification question on the amount of cut and fill and export and import you are planning on these homes. I know per your last set of updated plans the homes were sunken down a greater amount than the original submitted set of plans. I imagine this will require a greater amount of cut and fill and export/import. Please clarify, as this information is needed for the MND.

Best Regards,



Stacy Farfan  
DEPARTMENT OF CITY PLANNING  
West/Coastal/South Project Planning  
L(213) 978-1369 | e.stacy.farfan@lacity.org  
200 N. Spring St., Room 721  
Los Angeles, CA, 90012

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Please consider the environment before printing this email.

Sophie <Sophie@steenodesign.com>  
To: Stacy Farfan <stacy.farfan@lacity.org>  
Cc: tom steeno <tom@steenodesign.com>, meliena <meliena@steenodesign.com>

Wed, Aug 9, 2017 at 3:25 PM

The current Cut and Fill rates are as follows:

Murthy 1307 W. Paseo Del Mar = Cut 751 c.y. and Fill 15 c.y.

Poola 1305 W. Paseo Del Mar = Cut 590 c.y. and Fill 5 c.y.

Please confirm receipt.

Thank you,

**SOPHIE STEENO, OFFICE MANAGER**

**STEENO DESIGN STUDIO INC.**

PH. 760.244.5001

www.SteenDesign.com



## ***Ailanthus altissima***

From Wikipedia, the free encyclopedia

### **Tree of heaven**<sup>[1]</sup>



Large specimen growing in a park in Germany

***Ailanthus altissima*** /ɛɪˈlænθəs ælˈtsɪmə/,<sup>[3]</sup> commonly known as **tree of heaven**, **ailanthus**, **varnish tree**, or in Chinese as ***chouchun*** (Chinese: 臭椿; pinyin: *chòuchūn*), is a **deciduous** tree in the family **Simaroubaceae**.<sup>[1]</sup> It is native to northeast and central China, and **Taiwan**. Unlike other members of the genus *Ailanthus*, it is found in temperate climates rather than the tropics.

The tree grows rapidly, and is capable of reaching heights of 15 m (50 ft) in 25 years. While the species rarely lives more than 50 years, some specimens exceed 100 years of age.<sup>[4]</sup> Its **suckering** ability allows this tree to clone itself indefinitely.<sup>[5]</sup> It is considered a **noxious weed** and vigorous **invasive species**,<sup>[1]</sup> and one of the worst invasive plant species in Europe and North America.<sup>[6]</sup>



December 10, 2021

To: Steve Padilla, Chair, California Coastal Commission  
CC: John Ainsworth, Executive Director, California Coastal Commission  
Vince Lee, Coastal Permit Analyst, California Coastal Commission

**RE: Item W14b&15a, Appeal and De Novo No. A-5-SNP-19-0136 & 5-20-0153  
- San Pedro, Poola**

Dear Chair Padilla,

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people. Over one third of Southern California's coastline is already armored, and Surfrider opposes the ongoing coastal armoring that destroys public bluffs and beaches. We respectfully request that the Commission deny the 1305 West Paseo Del Mar blufftop development application as it is inconsistent with the City of Los Angeles' Local Coastal Program and the Coastal Act and will further degrade public bluffs and beaches in the South Bay.

Item W14b&15a regards a development project that would construct a 4,800+ sq. ft. blufftop house on a vacant lot. The home would rely on three 70-foot soldier piles (caissons) that **are likely** to become exposed within the lifetime of the project and therefore serve as de facto armoring for the new development.

The bluffs in this area are some of the few remaining unarmored bluffs in California. This project, in addition to another project described in Item W14c&15b on this month's Coastal Commission meeting agenda, represents some of the first of many homes considering redevelopment on W Paseo del Mar in San Pedro. The decisions made on the two development projects will set precedent on viable proposals in the area and determine the fate of San Pedro's coastal bluffs.

**The Proposed Development Conflicts with Coastal Act Section 30253**

The Proposed Development is at risk of relying on de facto shoreline armoring. As stated in the Coastal Commission staff's geotechnical review memorandum, this is problematic:

"This is of practical concern because the Commission has previously found that caisson stabilization systems, in some situations, can act as protective devices that alter natural landforms, inconsistent with Coastal Act Section 30253(b)"

Coastal Act Section 30253 states the need for new development to ensure stability without requiring protective devices:

**Section 30253 Minimization of adverse impacts**



*New development shall:*

*(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*

***(2) 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.***

*(3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development*

*(4) Minimize energy consumption and vehicle miles traveled.*

*(5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

It is clear that the proposed development relies on soldier piles in order to achieve the necessary **1.5 factor of safety** required by the City of Los Angeles' Local Coastal Program. Given that the soldier piles will be situated fifty feet back on an eroding bluff, the Commission cannot conclude they will not become exposed and act as a form of shoreline armoring throughout the life of the project, which could be from 75-100 years.

The geotechnical review memorandum states that the exposure of the soldier piles is "unlikely but possible, (page 37, Geotechnical Review Memorandum)" and that "the soldier piles would not...act as a bluff retention or protective device, at least in the near term." (page 6, Geotechnical Review Memorandum). In other words, it cannot be guaranteed that the soldier piles will not act as shoreline armoring over the lifetime of the project, which may be as long as 100 years given the age of surrounding homes.

Given the considerable discrepancies about erosion rates across the applicant's Geotechnical Review, the City's geological findings, and the Coastal Commission staff's geotechnical review, it would be irresponsible for the Commission to assume that the soldier piles will not become exposed, and to permit a caisson-reliant design that arose from the City's uniquely conservative estimates of bluff stability.

#### Existing Precedent Addresses Feasible Alternatives

The Coastal Commission has denied similarly oversized blufftop development proposals before in Solana Beach. According to a [2018 staff report](#) considering blufftop development in Solana Beach:

In past projects, when the Commission has been faced with a site where there is no safe place to build a new home on a blufftop site, the Commission has approved construction of a new home setback only to the current factor of safety line, where the home would be safe currently, in order to allow some reasonable use of the site





(ref: 6-15-1717/Barr in Solana Beach). In that case, the Commission was able to find approval of a new home on the site consistent with the Coastal Act because the setback of the new home was significantly further landward than the existing structures on the site (46 ft. vs. 0 ft.), the new home would be sited landward of the location of the 1.5 factor of safety setback, and the home did not include a basement or caisson foundation, such that the home could be removed in the event of endangerment in the future.

Given this precedent, the proposed development should be denied and the proposed project design re-evaluated. Should the Commission consider giving direction for the applicant regarding acceptable development, it could consider providing the applicant with direction regarding appropriate geotechnical evaluation for the area in order to achieve the 1.5 factor of safety onsite.

The current project proposal is situated in a hazardous area at the site of an existing landslide. As stated in the staff report, “the coastal bluffs in San Pedro are subject to a variety of erosive forces and conditions as a result the bluffs and blufftop lots in the San Pedro area are considered a hazardous area and designated as such in the certified San Pedro LUP (page 34, Staff Report).” The direction that was pursued in the Solana Beach case demonstrated avoidance of siting new construction in a hazardous area — a strategy clearly called for in the Commission’s Sea Level Rise Guidance.

Notably, the Guidance “recommends avoidance of hard shoreline armoring when possible. This can entail denying development in hazardous locations, allowing only development that is easily removably as the shoreline erodes, or requiring new development to be set back far enough from wave runup zones or eroding bluff edges so that the development will not need shoreline armoring during its anticipated lifetime<sup>1</sup>.” (page 168, Sea Level Rise Guidance.)” None of these approaches would be adequately pursued with approval of the permit.

#### We must move away from oversized developments on our bluffs

It is time we move away from oversized developments on California’s coastal blufftop lots. The City of Los Angeles does not currently have a certified LCP for the San Pedro area. The project is therefore at risk of prejudicing the ability of the City to prepare and LCP that appropriately sites new developments from coastal hazards. We should not rely on as yet unproven special conditions for removal of shoreline armoring and residential development in an undetermined future.

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<sup>1</sup> California Coastal Commission, 2018. *Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits*  
[https://documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdoptedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf)



Instead, we should avoid siting new development in hazardous locations — as the Coastal Commission’s Sea Level Rise Guidance clearly call for. Smaller developments, or removable developments for blufftop lots may be far more reasonable and consistent with the Coastal Commission’s mandate to protect the California Coast, sensitive habitat and maximize public access. Thank you for your consideration of these comments.

Sincerely,

Laura Walsh  
California Policy Manager  
Surfrider Foundation

Mandy Sackett  
California Policy Coordinator  
Surfrider Foundation

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**From:** Robin Rudisill <wildrudi@icloud.com>

**Sent:** Friday, December 10, 2021 4:53:54 PM

**To:** Robin Rudisill <wildrudi@iCloud.com>; SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>; Vaughn, Shannon@Coastal <Shannon.Vaughn@coastal.ca.gov>; Stevens, Eric@Coastal <eric.stevens@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; Brownsey, Donne@Coastal <donne.brownsey@coastal.ca.gov>; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>; Mark.Gold@coastal.ca.gov <Mark.Gold@coastal.ca.gov>; Mann, Zahirah@Coastal <zahirah.mann@coastal.ca.gov>; Faustinos, Belinda@Coastal <belinda.faustinos@coastal.ca.gov>; Luce, Shelley@Coastal <shelley.luce@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Rivas, Rick@Coastal <rick.rivas@coastal.ca.gov>; Aguirre, Paloma@Coastal <paloma.aguirre@coastal.ca.gov>; Mandelman, Rafael@Coastal <rafael.mandelman@coastal.ca.gov>; Morales, Maricela@Coastal <Maricela.Morales@coastal.ca.gov>; Diamond, Francine@Coastal <francine.diamond@coastal.ca.gov>; Matt@sdcoastkeeper.org <Matt@sdcoastkeeper.org>

**Cc:** Noel Gould <aquarianstudios@hotmail.com>; Mark Severino <msevs@earthlink.net>; Doug Epperhart <epperhart@cox.net>

**Subject:** W15a & W15b: 1305 Paseo del Mar & 1307 Paseo del Mar, San Pedro

## W14b&15a

1305 Paseo del Mar, San Pedro  
and

## W14c&15b

1307 Paseo del Mar, San Pedro

Strongly oppose Staff Recommendation of approval

Special Coastal Commissioners,



I am an elected Board member of the Coastal San Pedro Neighborhood Council and the Chair of its Land Use and Planning Committee. As this project falls within our jurisdiction I am required to inform you of our position in opposition of this project. Please see attached letter.

However, I write to you today as an individual, as an officer of Citizens Protecting San Pedro and as a Board member of Coalition for a Scenic Los Angeles, a chapter of Scenic America whose mission is to preserve and enhance the visual character and scenic beauty of America.

I am extremely concerned about the staff recommendation for these two projects.

I've been involved as a coastal advocate for a long time, close to a decade, and this is the most shocking staff report I've ever read....and I've read a lot of them. I don't say this lightly and I have never said it before. And as you may know, I reserve letters directly to Commissioners for only my most serious concerns.

One of the requirements in the Coastal Act, section 30320, is that the public have confidence in the Commission and its practices and procedures. My confidence is terribly shaken by this staff analysis and recommendation.

This is the first appeal in the San Pedro Coastal Zone that I am aware of and the most pivotal case to ever come before you for San Pedro.

These are not just a couple more houses in the Coastal Zone. These are two adjacent and extremely out of scale structures (therefore harming community character), built to look like and be used as a 2-lot compound or a 8,829 square foot mansion with 2,278 square feet of roof deck!! (therefore harming visual resources), in the dual zone, in a special coastal community, on an unstable bluff, in a scenic bluff area.

The outcome of these two cases will impact how this neighborhood will look for the next 50-100 years and beyond.

Please protect the virginity and sensitivity of this bluff.

Please do not allow what would be a cumulative impact of large structures and compounds requiring multiple caissons, 4.5' in diameter, 70' deep with a 50' steel beam that ties each together, up and down these delicate coastal bluffs!

Please don't allow these projects to harm the character of this special and unique scenic bluff neighborhood.

Please don't let this neighborhood become an enclave for the rich.

My main concerns are detailed below:

1. The Coastal Act requires that its provisions be construed liberally.

Coastal Act section 30009 Construction states:

“This division shall be liberally construed to accomplish its purposes and objectives.”

I was astonished to see that not only was this provision to construe the Coastal Act liberally ignored, the staff went to the opposite extreme for this pivotal special coastal community of San Pedro, dual zone, and scenic bluff project, which will harm a valuable coastal resource.

## 2. Coastal Act Section 30251 is being misinterpreted.

I'm very disappointed to see the staff essentially say that there are other homes along this scenic highway that block the view so we may as well let this new home (and the cumulative impact of all of the homes built after it), one of the first developments built since the Coastal Act was approved, do the same thing, which would cause a cumulative impact of all successive homes not being required to have view corridors between them.

This is your opportunity to follow the Coastal Act's requirement to site and design the development 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. A view corridor between the homes must be required.

## 3. San Pedro is a Special Coastal Community as per the Coastal Plan.

<https://www.govinfo.gov/content/pkg/CZIC-ht393-c2-c33-1975/html/CZIC-ht393-c2-c33-1975.htm>

Coastal Plan, p. 78:

Restrict Inappropriate Development. Development out of scale, size, or social character shall not be allowed in designated special communities and neighborhoods. In determining the appropriateness of a proposed development, consideration shall be given to intensity of use (e.g., lot size, unit size, residential composition, height, bulk), pedestrian accessibility, open space, economic and social factors, and the **cumulative impact** that potential development would have on an area's resources.

Coastal Plan, p. 250:

To preserve the unique character of San Pedro, the general plan and the downtown redevelopment plan should be updated stressing maintenance of the social and economic diversity and taking into account the community's close ties with the harbor, and its residential-recreational use by low and moderate-income families. Additional commercial development and most new residential development should be channeled to the downtown area.

Coastal Plan, p. 284:

Along the developed section of the south coast shoreline between the Santa Monica

Mountains and Orange County, the line narrows to follow the nearest roads adjacent to special coastal neighborhoods (e.g., Venice, San Pedro, and Naples/Belmont Shores)...

Coastal Plan p. 398:

San Pedro. Preserve the unique character of San Pedro and its major role as a recreational destination for low-income and minority group persons. Local plans should be updated and should take into account the community's close ties with the harbor and its residential/recreational use by low- and moderate-income families.

According to the Coastal Plan, San Pedro is a special coastal community. Staff errs in not considering Coastal Act Section 30253, which states that new development shall, where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

In addition, the certified Coastal San Pedro Land Use Plan (LUP) states that:

- \* the varied and distinct neighborhoods of San Pedro be maintained,
- \* the scenic and visual qualities of San Pedro be protected as a resource of regional importance,
- \* development be sited and designed to protect views to and along the ocean, harbor and scenic areas, minimize the alteration of natural landforms, be visually compatible with the character of the surrounding area, and prevent the blockage of existing views from designated public scenic view areas and scenic highways,
- \* all development seaward of the view site areas of Paseo del Mar and Shepard Street shall be sited, designed and constructed so that public views to and along the ocean are protected to the maximum extent feasible,
- \* all development in this area shall be subordinate to its setting and minimized in height and bulk to the maximum extent feasible to accomplish view protection,
- \* until a "corridor plan" is prepared for a Scenic Highway, any development adjacent to a Scenic Highway shall protect public views to the ocean to the maximum extent feasible and be adequately landscaped to soften the visual impact of the development.

Staff errs and abuses its discretion in not correctly applying Coastal Act 30253 and the above sections of the LUP in its findings.

#### 4. Character includes consideration of mass and scale

It is common knowledge that in land use the character of a neighborhood includes architectural styles, scale and mass.

Adrian Scott Fine of the Los Angeles Conservancy is quoted as so eloquently saying:

"While the character of a neighborhood is not always easily defined, it is often made up of a collection of buildings, architectural styles, and a similar scale and massing that, when combined, work together to help impart a specific look and feel of a place."

You will find a similar definition of neighborhood character in any number of land use



documents.

Due to the significantly much larger sizes of the garages, they must be included when considering compatibility of the neighborhood. These developments would be the two largest structures on the bluff, and combined as a compound (or one dwelling) would be almost 5 times larger than the average home on the bluff (including garages: 8,829/1,915). How much is too much? Any reasonable mind would agree that this is too much and that the sheer scale of these homes would harm the character of this bluff neighborhood.

Therefore, Staff's statement that "Commission staff notes that, although the Coastal Act and the LUP provide for the protection of community character in the San Pedro neighborhood, neither...limit the size, mass, or scale of new development in the area" is not correct as the Coastal Act and the LUP do require character to be protected and character includes size, mass and scale. Staff's finding that there is no substantial issue with respect to community character and visual resources is in error because the development is not visually compatible with the character of surrounding areas. Due to its significantly larger size and also as it presents as one compound, the development is clearly not compatible with the bluff neighborhood in terms of size, mass and scale (note evidence of size compared to average of the bluff above).

Staff errs in concluding that no coastal resource is being impacted. The community character of a special coastal community and scenic bluff would be significantly adversely impacted.

#### 5. The staff ignored the appeal points related to Coastal Act Section 30250 and cumulative effects.

The overriding problem is that this project would cause an existential adverse cumulative effect to the character of this low-scale, quaint and special coastal bluff. The Coastal Act Section 30250 requirement and this issue is specifically mentioned in the appeal several times and yet Staff doesn't mention section 30250 or the words "cumulative effects" in the staff report. This is a glaring omission and error.

The cumulative effect of every other site along the bluff building out like this one, driving huge caissons into the ground in order to support it on the unstable bluff, must be considered.

If every house rebuilds like this house it would completely change what is there.

Future projects are probable given the significance of this precedent, and there are other current pending projects at 1207 Paseo del Mar and 557 Shepard as well as others waiting and watching to see if this project is approved as proposed. Together with these projects there would be a significant adverse cumulative impact on both the stability and the community character of this delicate bluff neighborhood and therefore on the San Pedro Coastal Zone.

6. Significant excavation of the bluff in order to allow the structures to be as tall and therefore as large as possible must not be allowed.

Originally, this applicant significantly exceeded the 26 foot height limit. So what did they do? They decided to excavate a significant amount of the bluff lot in order to site the home several feet lower into the ground, in order to meet the height limit, in order to have the largest house possible. This should never be allowed, particularly in a location of instability and landslides!!

The home must be built at the allowed height for this area without excavating several feet of soil, in order to build the house several feet lower than grade, in order to meet the height limit.

No soil removal should be allowed other than what is absolutely needed for the support structures.

The cumulative impact of this is, frankly, unthinkable. I do not understand why Staff is OK with the cumulative impact of every lot on that bluff removing 3-4 feet of soil so the foundation of the home can be set into the bluff top in order to meet the height limit.

7. Roof decks are not a part of the character of the bluff neighborhood.

There are no other roof decks on the Paseo del Mar bluff, nor are they necessary. Roof decks do add to the bulk/mass of a home and residents often put up canopies, furniture and other items that make them look like another story.

8. The extraordinarily garage sizes are not a part of the character of the bluff neighborhood.

The garages should be scaled down in size to a reasonable size in order to be compatible with the other garages on the bluff, such as 400 square feet (the average garage on the cliff is 315 square feet). Anything larger than that is too big and more than needed for a single-family home and is not following the LUP requirement that all development in this area shall be subordinate to their setting and minimized in height and bulk to the maximum extent feasible

9. Other 2-story homes on the bluff are setback approximately 75 feet.

It is not clear how the bluff edge was determined and whether it considered erosion or sea level rise. Also, the structure should either be modified to be a one-story home or be set back approximately 75 feet from the bluff edge as are the other 2-story (heavier) homes along this bluff.

10. The parking provided appears excessive for use as single family homes.

In reviewing the plans it appears that at least a dozen cars could park at the compound. Given the extensive amount of parking being provided on the site, this compound (with no fence between the two structures) could be used as a conference center. In fact, we have heard that when the applicant was searching for property that they were specifically looking for a property that they could use as a compound, conference or large meeting site. Conditions should be put into place to prevent this type of use.

Only two parking spaces are required for each single family home. As per the plans, it appears that parking is being provided for many times that number. As required by the LUP, the project must be limited in size to the extent feasible and so the available parking should be reduced.

#### 11. 2-lot compounds are not part of the character of this neighborhood.

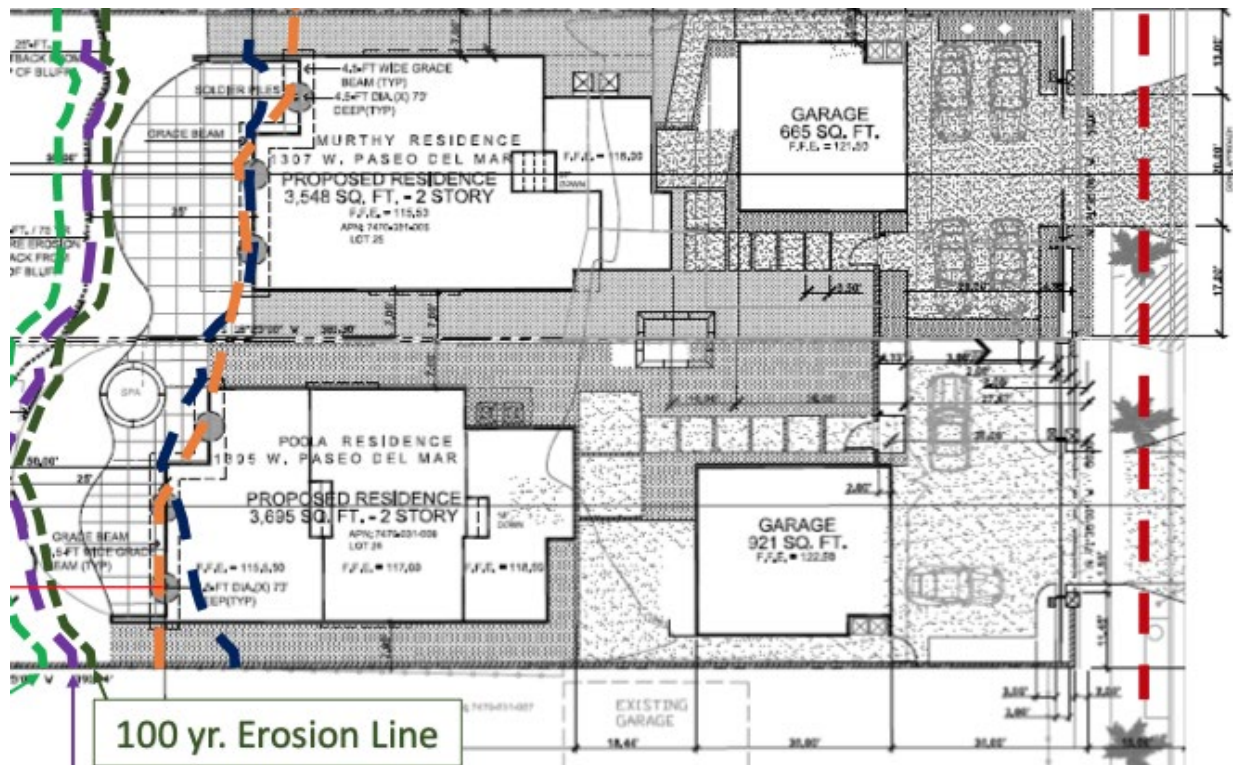
These homes don't just look like a compound, they are apparently intended to be used as either a compound or as one large home/mansion.

They will appear as one large home or compound from the street. There is a non transparent, tall wall across the front of the entire area between the two lots, making it appear to be one development. Also, the architectural features and materials are similar, which contributes to the two projects appearing as one development or compound.



In addition, there is no fence or wall structure along the property line between the structures and there is a water feature and two trees in the location where the fence or wall would be.





It's clear that the applicants intend to use the two homes together as a compound.

This is not a neighborhood of compounds. Compounds are not a part of the character of this neighborhood.

The applicant should be required to make changes so that the two homes do not appear as

one home or a compound, such as adjusting the tall, nontransparent wall across the front between the homes to be lower (42") and transparent, and such as varying the architecture and materials.

12. In most definitions, pier/caisson foundations to support a structure are considered shoreline protective devices.

What would a shoreline protective device be at this location? It could only be exactly what the applicant is proposing – caissons to protect a structure that is on an unstable bluff where they could not build without them. Support it from what? From the effects of erosion and bluff instability.

The property stands between two major landslides, Sunken City and the Paseo del Mar slide. Also, according to Rick Martin, Hamilton & Associates, with over 50 years' experience as a geotechnical engineer, there was a landslide that occurred in the 1950's at the proposed project site that isn't mentioned in the City's geotechnical report. (report included in the case file provided by the City).

This is an inherently unstable site. This is a landslide area. When the applicant was only just testing the site there were impacts to surrounding homes such as cracks in their foundation.

What are the caissons for? They are for protecting the home in the event of landslides and from the effects of erosion. If those were not risks, the caissons wouldn't be needed.

The caissons are in effect stabilizing the bluff under the house, without which the site is undevelopable. There wouldn't be the need for the caissons if the structure wasn't being built on an unstable bluff. It is needed to keep the bluff intact to support the house. The caissons would not be needed if the bluff wasn't at risk of failing. If this isn't shoreline protection device, what would be a shoreline protection device on this bluff?

As noted in the conditions, a significant issue is, when will these shoreline protection devices become exposed. They are shoreline protection devices and they will become exposed over time.

Allowing these caissons prejudices the LCP as the potential LIP would likely prohibit new development from using such devices in order to built on unstable bluffs.

In addition, the Coastal Act requires minimization of the alteration of natural land forms.

Again, Staff ignores the cumulative effects of putting in caissons on this unstable bluff. The thought of new homes going in on the Paseo del Mar bluff, the cumulative effect, all with pier/caisson foundations, is unacceptable.

There is a really important issue here regarding the scale of the project and what's needed to support a structure of this sheer size and what is the right bluff top location for homes along

this bluff stretch. The size of a structure that could be located on the lot that would not require caissons should be determined and the developments should be limited to that size.

13. This project would cause an Environmental Justice issue because it will change the social and economic character of the neighborhood.

Allowing a project of this sheer size would have the cumulative effect of a demographic shift. You would be moving this neighborhood to the next economic level up and changing the character to a much more affluent character.

Keeping new projects on this bluff in the scale of the neighborhood controls the ability for the area to stay accessible and not become another affluent-only coastal neighborhood.

The social and economic diversity and character of San Pedro must be protected. That was important in the Coastal Plan and is important in the Coastal Act and LUP is well. This area must be prevented from becoming an enclave for the rich.

Just like in Venice where the social character has been allowed to significantly change, the minute such significantly larger homes would be approved, others would decide they want to make their homes 3-4 times larger as well or use two lots to build a compound or a mansion over the two lots. The cumulative impact of this approval would be for the mansionization of the bluff. This would also cause a cumulative impact of dozens of properties adding caissons, likely further destabilizing the bluffs.

Because this is one of the first projects to be proposed on this bluff since the Coastal Act was approved (36 of the 38 homes were built before the Coastal Act), it will open the door to many more along the Paseo del Mar bluffs in this and other bluff locations, especially as the homes in the area are aging, causing a significant adverse cumulative impact on community character, violating Coastal Act sections 30251 and 30253.

Allowing home sizes to significantly increase in an area is exactly what pushes up land prices and causes the rich to get richer and the poor poorer, causing loss of affordable housing as well as homelessness.

[https://enewspaper.latimes.com/infinity/article\\_share.aspx?guid=0a82568b-9b24-4ffc-9e36-9466089beae1](https://enewspaper.latimes.com/infinity/article_share.aspx?guid=0a82568b-9b24-4ffc-9e36-9466089beae1)

A recent L.A. Times article noted that:

"A majority of voters see major institutions, including local, state and federal governments, homeowner associations and the media, more as "part of the problem" than part of the solution. Developers and real estate groups came in for particular opprobrium, with 75% of voters viewing them as part of the problem."



If the City and you keep approving significant size increases in developments such as this compound, which is over five times the size of the average home on the bluff, you will cause the values of homes to significantly increase as speculators will believe that they too will be approved for a significantly larger home. This is exactly what has happened in Venice, with continued approvals by the City and the Commission of larger and larger homes, well beyond the scale and the character of the existing neighborhoods. And prices have risen and risen accordingly, pricing the most socially and economically diverse residents out of the coastal zone.

You have the power to prevent or at least significantly slow this crazy gentrification on steroids for Coastal San Pedro and prevent the outrageous increase in values seen in Venice, which has dramatically changed its social character.

14. Approval of this compound project will prejudice the writing of the San Pedro LCP.

The San Pedro LUP was approved in the 80's and the City of L.A. doesn't even have a LCP for San Pedro on its radar!

This is the first appeal related to this area, and, as noted above in section 3, the applicable sections of the LUP have not been followed, which will cause a significant prejudicing of the San Pedro LCP.

\*\*\*\*\*

Proposed Conditions:

1. Build and maintain a fence on the property line between the two properties.
2. Use is restricted to two single-family dwellings and specifically not as one single family dwelling or a compound or a retreat/conference center or any other type of meeting assembly requiring significant parking.

Proposed changes to the project:

Build a much smaller house without caissons, further back from the bluff and within the height limit without excavating soil to build the foundation below grade.

Eliminate the roof deck.

Reduce the parking garages to 400 square feet.

No excavation to allow the house to be built below grade.

Homes maximum 2,300 square feet.

Vary the styles and materials of the two homes.

Do not remove three large palms.

Thank you for your consideration.

For the Love of Los Angeles  
and our precious Coast,  
Robin Rudisill  
(310) 721-2343



## COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

**Doug Epperhart**  
President  
**Dean Pentcheff**  
Vice President  
**Shannon Ross**  
Secretary  
**Louis Dominguez**  
Treasurer

June 18, 2018

Theodore Irving, Zoning Administrator  
Zoning Administrator  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA

Re: Case number ZA-2013-3632-CDP-MEL  
Case number ZA-2013-3636-CDP-MEL

Dear Zoning Administrator:

At the June 18, 2018 Coastal San Pedro Neighborhood Council meeting, the Board approved the following resolution opposing the projects associated with the above case numbers:

*Be it resolved, the Coastal San Pedro Neighborhood Council urges the Zoning Administrator to **DENY** the projects at 1305 & 1307 W. Paseo Del Mar, case numbers ZA-2013-3632-CDP-MEL and ZA-2013-3636-CDP-MEL, as currently proposed.*

If you have any questions, please email us at [cspnclive@gmail.com](mailto:cspnclive@gmail.com).

Sincerely,

Doug Epperhart  
President  
On behalf of the Coastal San Pedro Neighborhood Council Board

1840 S Gaffey St., Box 34 • San Pedro, CA 90731 • (310) 918-8650 •  
[cspnclive@gmail.com](mailto:cspnclive@gmail.com)





W14b&15a  
1305 W. Paseo del Mar San Pedro  
W14c&15b  
1307 W. Paseo del Mar San Pedro

## **Strongly Oppose Staff Recommendation for approval.**

Honorable Commissioners,

December 10, 2021

I'm an elected Board member of the Coastal San Pedro Neighborhood Council and Chair of the Coastline and Parks Committee as well as the Sunken City ad hoc Committee, but I'm writing to you as an individual and resident of W. Paseo del Mar because I'm deeply concerned about the staff recommendation for these two projects. We as a community, rely on the Coastal Act for guidance for what is permitted to be built in the Coastal Zone and even more so in the Dual Zone where these projects would be. As some of you know, Robin and I have actively participated in Coastal Commission meetings for the past seven years, and before Covid-19, we attended nearly every meeting every month no matter where in the state they were held. We are passionate about saving the coast and especially our Special Coastal Communities, and both San Pedro and Venice carry that designation, however, San Pedro hasn't been over developed with maximum square footage houses in our smaller scale neighborhoods in the same way that Venice has, and the proposed projects at 1305 W. Paseo del Mar and 1307 W. Paseo del Mar would be precedent setting developments where it's essential to make sure the Coastal Act is followed in order to protect and preserve the character of this Special Coastal Community.

We rely on the Staff to interpret the Coastal Act, the Certified Coastal Land Use Plan, and our Specific Plan correctly when we feel it's vital to appeal a CDP issued by the City of Los Angeles, and this is the first time we've had to file a Coastal Appeal in San Pedro.

Unfortunately, in Staff's De Novo recommendation, they site as supporting evidence for approval of these projects numerous references to the Harbor Area Planning Commission determination that we're appealing, which we're appealing because we believe they erred in making it!

### **Public Participation has been inhibited**

We reached out numerous times to staff in order to set up a meeting so that we could provide input, and we were ignored. When they finally replied and the meeting was scheduled, they had already solidified their recommendations. On top of that, they are combining the de novo hearing with the SI hearing, which makes it even more difficult for the Public to provide input and influence the outcome.

### **The Coastal Act standard of review has been carelessly interpreted**

It's worth noting that the City of Los Angeles San Pedro Coastal Zone still has no Local Coastal Program (LCP) or a Local Implementation Plan (LIP) that would include items like square footage and FAR (Floor Area Ratio) to assist in determining and quantifying issues related to community Character, Mass, and Scale, and in the absence of these programs, it falls to the Coastal Commission, and specifically you Commissioners, to interpret the California Coastal Act as it is the only governing law that applies in these situations, and the Coastal Act gives very clear guidance that:

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

### **Staff has erred in their interpretation of Community Character**

In the Summary of Staff Recommendation, "Commission staff notes that, although the Coastal Act and the certified LUP provide for the protection of community character in San Pedro neighborhoods, neither of which limit the size, mass, or scale of new development in the area."

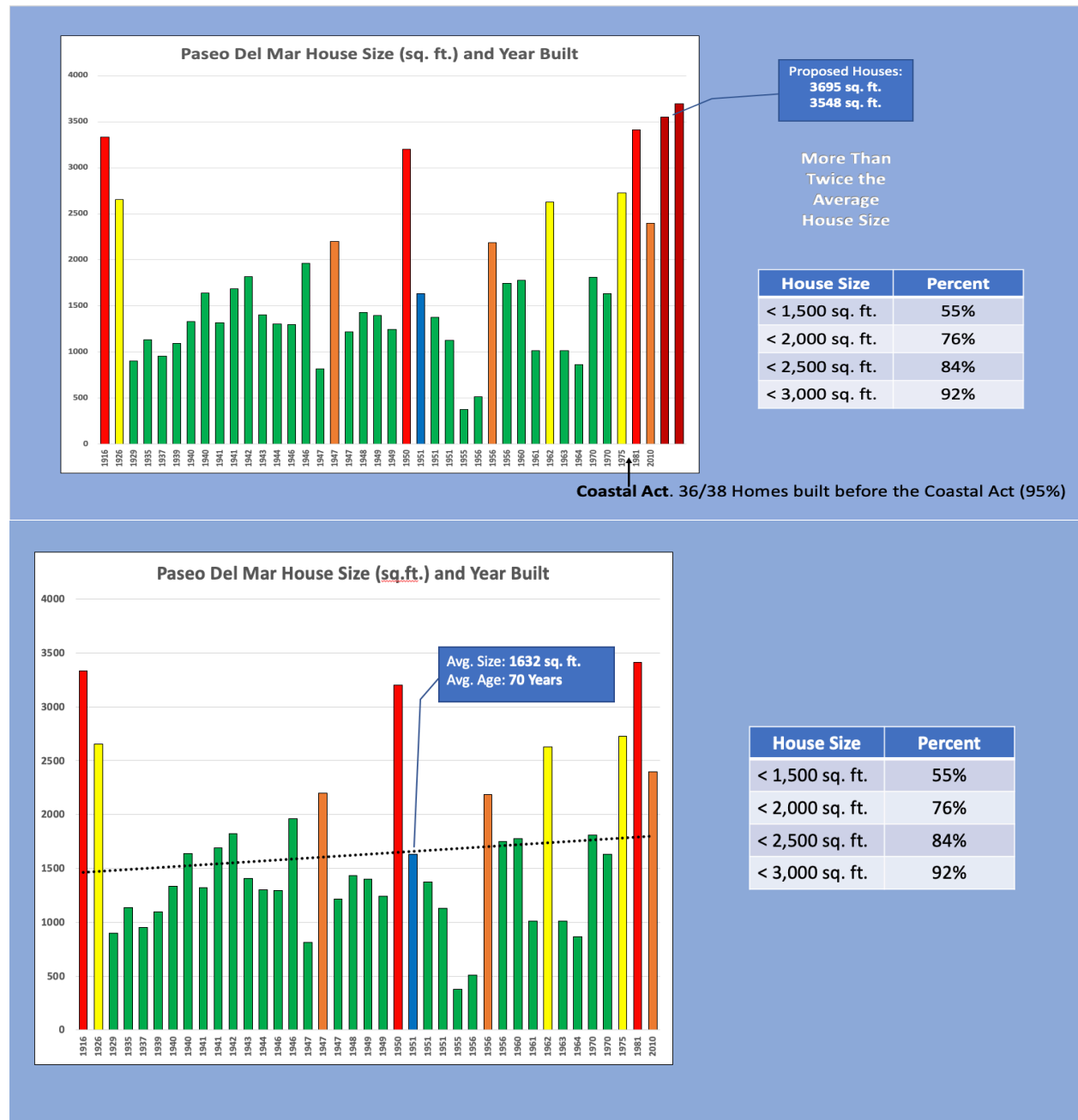
We respectfully disagree with this interpretation. Character, mass, and scale refers to the general look, feel, and size of the houses in the neighborhood, which in this case, is *only the south facing (ocean facing) bluff side of W. Paseo del Mar*, not the north, which is very different geologically, not Warmouth, not Barbara, and NOT a section of W. Paseo del Mar over 1.5 miles to the west. Unfortunately, the applicant has cherry picked some of the largest houses in San Pedro to justify the size of their projects including using their unbuilt, unapproved sister projects as comps for each other! This project is significantly out of scale with the visual character of the surrounding area, and *it's your state mandate to follow the Coastal Act and not allow that.* Also, in your recent 1,355 W. Paseo del Mar approval, Staff does consider that the Coastal Act requires that public scenic views be protected and that blue water views from Paseo del Mar, a public road, should be protected. This staff analysis must be consistent with that project on the same block of the same San Pedro bluff.

### **Our methodology for quantifying Community Character**

In our appeal, we researched the square footage of every home on the bluff, 38 lots in all including the 1302 square foot existing house at 1307 W. Paseo del Mar, and our work is listed on p. 12, Exhibit 3 of the Commission staff report exhibits. We calculated that the average square footage per lot was approximately 1,600 square feet and further calculated the average square footage of the garages at 315 square

feet and went on to calculate that the average square footage of the visible homes was 1,279 square feet. These results speak directly to the mass and scale of the homes on the entire bluff. The style of the homes varies quite a bit from craftsman, bungalows, Spanish, etc and varied styles are an integral part of the community character.

We’ve created a histogram showing the square footage of the houses along the left side and the year built along the bottom. You can see from the data, that only two houses were built post Coastal Act and that the two proposed houses shown at the far right of the graph are more than twice the average house size. In the second diagram, we show the average size and age which indicate a high potential for redevelopment based on the precedents you set with these two projects, and if allowed to move forward as proposed, our Community Character would be in serious jeopardy of being lost forever.



Coastal Staff made their own Community Survey, however there is a mathematical error in calculating the average square footage of the homes. They listed 37 properties, leaving out the house at 1307 W. Paseo del Mar, and the total square footage of all the homes on the bluff they came up with is nearly identical to ours. *Our total is 60,186 and Staff's is 60,664 which when divided by 37 comes to an average square footage of 1,639.56, not 2,172.50, a nearly 533 square foot difference, and it appears that this error contributed to the staff's interpretation that these proposed houses are not as incompatible as they certainly are.*

The reason we went to all the trouble researching and then making these calculations was to try and determine *what would constitute a material change* in the average square footage of the bluff top homes.

When approving any CDP, *cumulative impact must be considered, however, our cumulative impacts appeal point and Coastal Act Section 30250 were not even considered.*

*Section 30250 states in part:*

*(a) New residential...development...will not have significant adverse effects, either individually or cumulatively, on Coastal resources.*

Adverse cumulative effects will occur when a project or projects are approved that are dramatically larger than any other homes in the neighborhood, and that becomes the new standard which guides future development. In other words, these projects, if approved as proposed, would create a domino effect that would lead to many more, if not all, of the properties on the W. Paseo del Mar bluff being re-developed into similar sized compounds/huge homes which would cause the special and unique character of the area to be lost forever.

We propose that a way to maintain Community Character is to limit new development in size so that it only adds about 5% to the baseline square footage of all the homes on the bluff and would thus avoid creating a material change, and two new homes at 2,300 square feet each would increase the baseline square footage by 5.42%, which we feel is fair. The houses as proposed, however, would add 9.77% and the garages would add a whopping 11.95%. The 921 square foot garage, on its own, is larger than five of the existing homes! Even if these projects are allowed to move forward with the use of caissons, which are prohibited in section 30253 of the Coastal Act, they must be dramatically scaled back.

Coastal staff argues that many of the lots have a walled off effect, and thus a new walled off project wouldn't create an issue with Community Character; however,

*Section 30251 states in part, that "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.**"*

Since these projects would be new construction, it is definitely feasible to restore and enhance visual quality, by for example removing the dilapidated fence on the empty 1305 W. Paseo del Mar lot and implementing the requests of Coastal Program Analyst Eric Stevens as stated in his May 14, 2019 letter to the applicant,

*"The subject site is located directly between a public coastal road and the ocean. The Commission has found it important to preserve views to prevent a walling-off effect of the coast. View corridors should be created in the north and south, (he means east and west), side yards of the proposed home. To preserve public views from the street, landscape materials within the view corridors should be species with a growth potential not expected to exceed 3 feet at maturity and all proposed landscaping in these yard areas should be maintained at a height of 3 feet or lower (including raised planters). Furthermore, any fencing or gates within the side yard setbacks should permit public views and have at least 75% of its surface area open to light. Please submit a revised landscaping and fencing plan that provides for public views of the coast along the property side yards. In addition, please also confirm that only native, drought-tolerant, non-invasive plants are proposed as part of the landscaping plan."*

(letter attached)

It is inexplicable that other staff later superseded this request by allowing this project to have a walled off effect.

### **These projects amount to a giant compound, not retirement homes.**

This applicant has instead provided a proposal with a common six-foot high wall joining the properties, preventing any ocean views from the scenic highway, creating a de facto lot tie with the look and feel of a 9,000 square foot compound, and Staff has accepted this saying there are no issues with Community Character compatibility?! Also, all of the renderings show landscaping with palm type trees which are non-native and water hungry. To further support the fact that this is a compound, there is a large water feature that's bisected by the property line as well as several palm trees on the property line and no fence dividing the properties. It's obvious they plan to use it as a compound. Also the plans don't seem drawn to scale; notice that the 665 square foot garage and the 921 square foot garage look nearly the same size. There's parking for about eighteen cars on the property, calling into question the true proposed use of the property.

### **Prior Commissioner's Comments on Community Character and Cumulative Impact**

In the August 12, 2015 Coastal Commission hearing, former Commissioner Martha McClure made comments in reference to a project at 416-422 Grand Blvd. in Venice:

*"I googled around about six blocks of the project, and when I tour this neighborhood, there aren't compounds, there are houses, and they're inviting, and there are yards, and it's a community, and for me I can easily say character is NOT compounds in this neighborhood. I won't support it...but I think that might be a reach that will start sending the message to the City of Los Angeles that it's high time to consider the character and follow the LUP that they've already adopted that is very strict about wanting to have character. This is a neighborhood and compounds aren't usually something you have in neighborhoods...compounds are usually up on the 40-acre parcels kind of thing, so I would reject on the basis that community character does not embrace compounds."*



*This is exactly the same situation we're dealing with concerning 1305 W. Paseo del Mar and 1307 W. Paseo del Mar. We have a beautiful historic small-scale community that would be forever threatened if these projects weren't made much smaller and compatible with our Community Character.*

And from Commissioner Effie Turnbull-Sanders regarding the same project:

*"Just looking at the cumulative effects of that kind of development in neighborhoods, you will reduce that ability to retain that unique character. Most of the applications that we had before us had so many of these large intrusive structures and you know fewer and fewer bungalows. Time after time we've been hearing from the public that we need to take into consideration these cumulative effects and how the cumulative effects of allowing this development is decreasing the ability of Venice to retain its cultural character. So I believe we do have the authority under Chapter 3 and the ability make findings that are consistent with the Venice land use plan and findings that would determine if we didn't tell this particular developer to go back to the drawing board and give us something a little bit better that that would prejudice the city of Los Angeles's ability to adopt a local coastal program because as I had mentioned before that, the train has kinda left the station and the further along we get if we don't send a message that the developers have to be a little bit more keen and a little bit more sensitive to helping flush out this cultural aspect of the local land-use plan for Venice which says that Venice has a unique social and architectural diversity that should be protected as a special coastal community pursuant to Chapter 3 of the California Coastal Act. I believe that we have the authority to make a difference in this community and protect a very valuable coastal resource, and for that reason I am likely to, respectfully, disagree with the staff recommendation for approval."*

*Again, here in San Pedro, we're facing the exact same threats of adverse cumulative impact that will lead to the destruction of our Special Coastal Community Character, and **you have the power to prevent this from happening!***

### **San Pedro is a Special Coastal Community**

Like Venice, San Pedro is considered a "Special Coastal Community" and extra levels of protection are needed as a result. These projects at 1305 and 1307 W. Paseo del Mar would set the precedent for all to follow and would allow for significant harm to the Character and mansions of the entire bluff.

### **Here are a few quotes from the 1975 Coastal Plan that support our view of the special, low-scale residential character of Paseo del Mar:**

#### **Coastal Plan:**

##### **Coastal Plan, p. 78**

Restrict Inappropriate Development. Development out of scale, size, or social character shall not be allowed in designated special communities and neighborhoods. In determining the appropriateness of a proposed development, consideration shall be given to intensity of use (e.g., lot size, unit size, residential composition, height, bulk), pedestrian accessibility, open space, economic and social factor and the cumulative impact that potential development would have on an area's resources.

##### **Coastal Plan, p. 250,**

To preserve the unique character of San Pedro, the general plan and the downtown redevelopment plan should be updated stressing maintenance of the social and economic diversity and taking into account the community's close ties with the harbor, and its residential-recreational use by low and moderate-income families. Additional commercial development and most new residential development should be channeled to the downtown area.

##### **Coastal Plan, p. 284**

Along the developed section of the south coast shoreline between the Santa Monica Mountains and Orange County, the line narrows to follow the nearest roads adjacent to **special coastal neighborhoods (e.g., Venice, San Pedro, and Naples/Belmont Shores), . . .**

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##### **Coastal Plan, p. 398**

**San Pedro.** Preserve the unique character of San Pedro and its major role as a recreational destination for low-income and minority group persons. Local plans should be updated and should take into account the community's close ties with the harbor and its residential/recreational use by low and moderate-income families.

Point Fermin Park has the oldest light house in California, built in 1874, and Paseo del Mar is designated as a scenic highway for a reason. The entire bluff area is a hugely popular visitor serving destination not only because of the ocean views but also because of the varied styles of homes, the beautiful yards, and the lower scale of the architecture on the bluff.

### **Extra Caution Required**

Paseo del Mar is bracketed on the east by the Sunken City land slide, an area of constant land movement and on the west by the White Point land slide in which a section of Paseo del Mar collapsed just over ten years ago on November 20, 2011, and there is more land slide activity occurring on other bluff top lots.

Even 1305 W. Paseo del Mar, one of the lots in question, has a storm drain easement on the east side of the property. It is not clear whether required setbacks are being followed. **We are deeply concerned that the house will surcharge the storm drain because the applicant hasn't provided a single engineering plan or permit regarding this issue, and the development can't go forward without these permits and plans.** (Surcharging is caused by the weight of a home creating pressure that can crush a storm drain.) Furthermore, the outflow from that drain causes significant erosion during any significant rain event, and there is no drainage pipe down to the bluff's bottom to prevent the bluff damage due to erosion from the drain.

Please see attached photo showing a gaping hole in the cliff face where water from the storm drain exits.

**Staff had it right early on before coastal lobbyists were hired.**

An email from Shannon Vaughn to the applicant dated February 27, 2017 (attached) states in part that "*the minimum setback may be further restricted based on the findings of the geotechnical report. The geotechnical report must consider impacts of the development for 100 years. Given this consideration, all new development must be sited and **designed so it does not rely on blufftop (or shoreline) protection.** Development within the minimum required setback must be easily removable if it becomes subject to erosion or found to be unsafe due to geotechnical conditions.*"

Shannon had it right in this email, but something has happened that caused a shift in Staff's position supporting this aspect of the Coastal Act.

There is **nothing** about this project design that allows for easy removal if it becomes unsafe! And staff is not even asking for a removal plan prior to approval as Eric Stevens originally requested. (May 14, 2019 letter attached) Furthermore, the project **does rely on bluff top protection** to achieve the required 1.5 factor of safety, and it would be a major departure from

Section 30253 (2) 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.**

**This same type of change of heart occurred with respect to the Eric Stevens letter dated May 14, 2019, as noted above.**

**At a minimum, this project needs to be scaled back.**

The idea that community character somehow divorces itself from home size and that 9,000 square foot compounds, located in single family neighborhoods with 1600 square foot average home sizes plus 315 square foot average garage sizes (totaling 1,915 square feet average per lot) are okay, and that the cumulative impacts of projects such as this, which would pave the way for massive large scale development of the bluff, are ignored, flies in the face of the letter and intent of the Coastal Act and is unconscionable!

Staff "finds that although Coastal Act policies provide for the protection of community character in San Pedro neighborhoods, none of them limits the size, mass, or scale of new development in the area." If this is true, then would a 20,000 square foot craftsman be okay in this area? Or a 9,000 square foot compound over two lots? **We hope you can see why we disagree with staff's position.** The San Pedro Specific Plan and the LUP both set a 26-foot height and two-story limit to new residential houses.

Even the garages, 921 square feet and 665 square feet are larger than a number of homes situated on the bluff!

We have never questioned the right of this applicant to build on these lots, and we support their right to do so, but these projects as proposed do not fit within the Community Character!

We, the community, are not being unreasonable. The applicant has hired the most feared coastal lobbyist to represent them on their quest to build two huge homes with two massive garages (extensions of the residences?) that together appear as one large compound effectively creating a lot tie with a common wall which would set a precedent allowing every home owner on the bluff to do exactly the same!

This is unacceptable and **not** what the Coastal Act or what the people of California intended when they decided to protect the California Coast as a resource of public importance for generations to come.

*The Paseo del Mar bluff homes are one of the last places in the state where people can drive to see what the original California Coastal developments of the 20's, 30's, 40's, and 50's looked like. Only two of the homes were built post Coastal Act. It's a beautiful and special place where people can experience the unique and special blend of homes that are a living history of the state and what the California Coast used to be like. These houses have yards and open space. This neighborhood has character.*

Section 30251 of the Coastal Act states in part:

*The scenic and visual qualities of coastal areas SHALL be considered and protected as a resource*

*of public importance. Permitted development SHALL be sited and designed to protect views to and along the ocean and scenic coastal areas, **to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas...***

***These proposed projects are not compatible with the character of the surrounding area! Visual compatibility encompasses the entire area including the characteristics of the homes, such as mass and scale, which represent size.***

***Additionally, there are no homes on the bluff with roof decks, and these homes include nearly 2,500 square feet of roof decking.***

The Coastal Commission is our last line of defense in our quest to protect the Coast, and when outside forces representing big money interests twist the Coastal Act to ignore the vital sections that were written to protect the Coast the way they were for a reason, Coastal Staff and the Commission must resist these influences.

### **What the Community Requires to Support These Projects**

If you're going to allow these projects with caissons because nothing can be built safely without them, we request that you require the applicant to:

- 1) Reduce their size to approximately 2,300 square feet average per house and vary their size and architectural style to reduce the compound effect.
- 2) Situate the houses farther back from the bluff.
- 3) Significantly reduce the garage sizes to an average of 400 square feet.
- 4) Eliminate the common six-foot wall tying both lots with a viewshed between the homes.
- 5) Insist on the requests made in Eric Steven's May 14, 2019 letter, including but not limited to plans and specific triggers for removal or retreat of the proposed development if it is threatened by bluff erosion or instability during its design life now rather than waiting for the future events that would require removal or retreat to occur.
- 6) View corridors should be created in both side yards of the proposed homes. To preserve public views from the street, landscape materials within the view corridors should be species with a growth potential not expected to exceed 3 feet at maturity and all proposed landscaping in these yard areas should be maintained at a height of 3 feet or lower (including raised planters). Furthermore, any fencing or gates within the side yard setbacks should permit public views and have at least 75% of its surface area open to light. Please submit a revised landscaping and fencing plan that provides for public views of the coast along the property side yards. In addition, please also confirm that only native, drought-tolerant, non-invasive plants are proposed as part of the landscaping plan.
- 7) Require a surcharge study with plans and permits to protect the storm drain easement.
- 8) Install an outfall pipe to ensure storm drain runoff runs directly to the bottom of the cliff below.

It's incumbent on the Commission to protect the Coast and the communities who live and visit there, not to bend or stretch the law for any applicant with the desire and resources to do so.

"You can't take our relationship with the coast for granted, because it took a lot of sweat, blood and tears to preserve it to we have what we have today. These things didn't just happen. The coast is what it is because a lot of people worked really hard and sacrificed to protect it. And if we want it to be there for our children, we have to keep fighting to protect it. In that way, the coast is never saved, it's always being saved."

- Peter Douglas, California Coastal Commission Executive Director 1985-2011

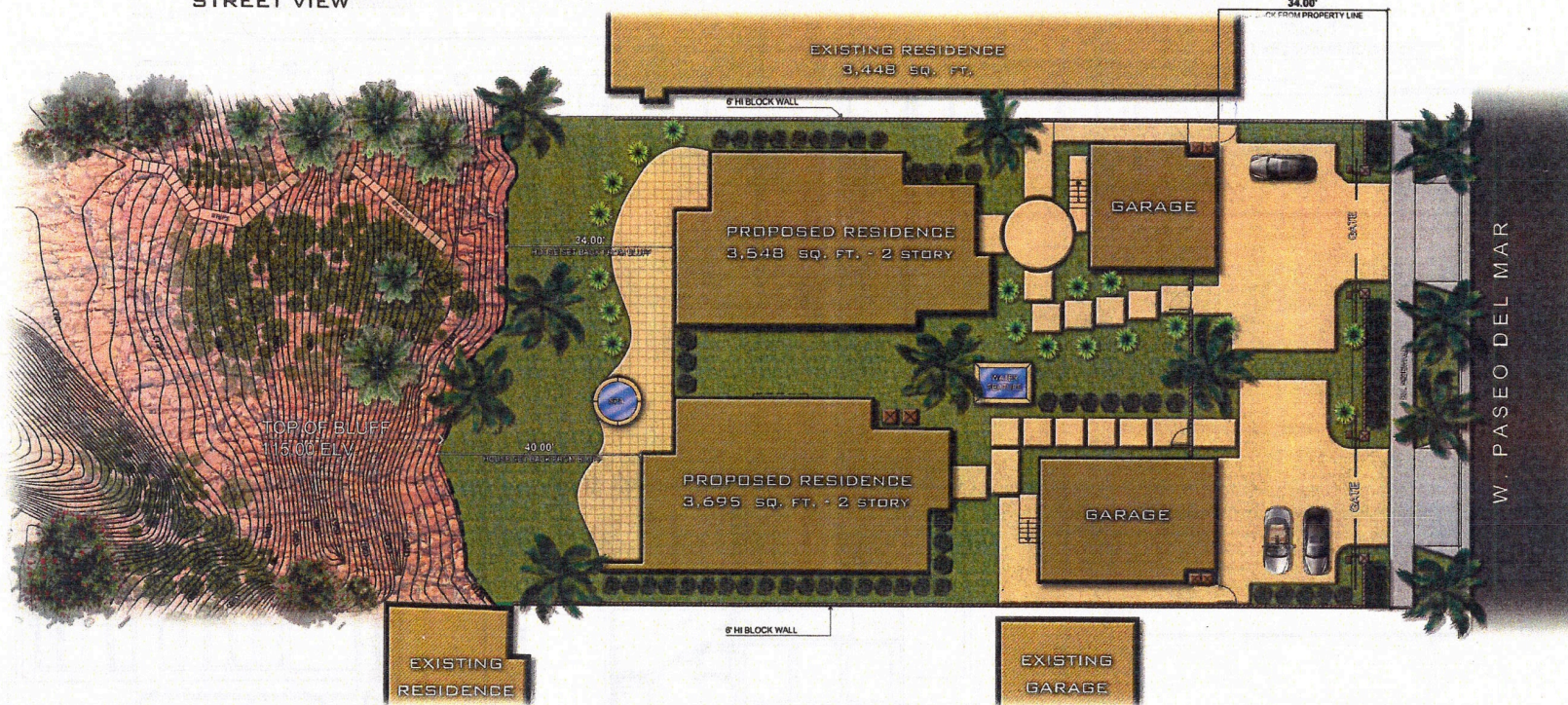
Sincerely,  
Noel Gould  
310-625-1157  
aquarianstudios@hotmail.com



58' SETBACK FOR BOTH FROM CLIFFSIDE



STREET VIEW



POOLA / MURTHY RESIDENCE  
SAN PEDRO, CA JANUARY 2019

**STEENO**  
DESIGN STUDIO  
ARCHITECT

REC'D 1/20/19





Stacy Farfan <stacy.farfan@lacity.org>

## FW: Blufftop Development in San Pedro

**meliena** <meliena@steenodesign.com>

Mon, Feb 27, 2017 at 2:37 PM

To: "Stacy Farfan (stacy.farfan@lacity.org)" <stacy.farfan@lacity.org>

Good Afternoon Stacy,

I received the following email from Shannon Vaughn with the Coastal Commission regarding the 25 feet setback regarding putting a concrete slab or pavers on the 25 feet setback.

Thank you, Meliena

**From:** Vaughn, Shannon@Coastal [mailto:Shannon.Vaughn@coastal.ca.gov]

**Sent:** Monday, February 27, 2017 2:06 PM

**To:** meliena <meliena@steenodesign.com>

**Subject:** Blufftop Development in San Pedro

Hi Meliena,

Thank you for your phone call. For blufftop development, the minimum setback for primary structures from the bluff edge is 25 feet. However, the minimum setback may be further restricted based on the findings of the geotechnical report. The geotechnical report must consider impacts to the development for 100 years. Given this consideration, all new development must be sited and designed so it does not rely on blufftop (or shoreline) protection. Development within the minimum required setback must be easily removable if it becomes subject to erosion or found to be unsafe due to geo conditions. I hope this helps. Please let me know if you have any other questions.

# Shannon Vaughn

## Coastal Program Analyst, South Coast District

California Coastal Commission

200 Ocean Gate, 10<sup>th</sup> Floor

562-590-5071

REC'D 5/3/2018



**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
301 East Ocean Blvd., Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



May 14, 2019

As detailed in the submitted geotechnical reports, the project site is located in a hazardous area that is subject to bluff erosion and instability. The Coastal Act prohibits new development that will require shoreline protection. Thus, new homes in hazardous areas must be set back far enough inland from the bluff edge such that they will not be endangered by erosion (including sea level rise induced erosion) over the life of the structure, without the use of a shoreline protective device, including a deepened caisson foundation. The Commission considers caissons to be a form of shoreline protection. Caissons require landform alteration and typically become exposed over time in the same manner as upper bluff protection structures. Thus, new development must not rely on caissons to assure structural stability nor to determine a safe bluff setback that would achieve the minimum required factor of safety of 1.5. Rather, the home should be sited as far back as necessary to be safe over the life of the structure, even if that means redesigning the footprint of the house, and/or reducing the required front yard setback.

Provide an updated site plan showing the location where new development would have to be sited in order to assure stability and structural integrity and not be in danger from erosion over a period of 75 years. This setback must be determined by combining the setback necessary to assure the stability of the slope against sliding in the present day (1.5 FOS) with an additional setback to account for the future retreat of the bluff over the proposed home's design life, typically assumed to be 75 years. The estimated erosion rate should account for likely increases to the rate of erosion resulting from Sea Level Rise.

In order to avoid the need for shoreline armoring in the future, plans and specific triggers for removal or retreat of the proposed development should be included with the project submittal. Please include a removal plan for the proposed home if it is threatened by bluff erosion or instability during its design life.

The subject site is located directly between a public coastal road and the ocean. The Commission has found it important to preserve views to prevent a walling-off effect of the coast. View corridors should be created in the north and south side yards of the proposed home. To preserve public views from the street, landscape materials within the view corridors should be species with a growth potential not expected to exceed 3 feet at maturity and all proposed landscaping in these yard areas should be maintained at a height of 3 feet or lower (including raised planters). Furthermore, any fencing or gates within the side yard setbacks should permit public views and have at least 75% of its surface area open to light. Please submit a revised landscaping and fencing plan that provides for public views of the coast along the property side yards. In addition, please also confirm that only native, drought-tolerant, non-invasive plants are proposed as part of the landscaping plan.

Commission staff has conducted a search of available records and has been unable to locate a permit for the private bluff stairway shown on the project plans. Thus, the existing stairway may be unpermitted and if so, should be removed as part of this project. If the applicant is unable to either provide evidence that the stairway was constructed and not significantly altered since enactment of the Coastal Act (January 1, 1977) or that a CDP was issued for the stairway, staff recommends that the applicant include a proposal to remove the stairway in conjunction with the proposal to construct the new home on the subject site.

## CALIFORNIA COASTAL COMMISSION

South Coast Area Office  
301 East Ocean Blvd., Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



May 14, 2019

Please submit all information in a physical and digital form with the resubmittal of this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Stevens".

Eric Stevens  
Coastal Program Analyst

(Y:\E Files for CDP Applications\2019 E Files for CDPs\5-19-0325 1305 W. Paseo Del Mar San Pedro\Prehearing Correspondence\Application Rejection Letter 2019 05 14.docx)



1305 + 1307 W. Paseo

EXHIBIT E

Tues



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33°42'45.44" N 118°18'