

CALIFORNIA COASTAL COMMISSION

SOUTH COAST DISTRICT OFFICE
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LONG BEACH, CA 90802-4325
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W15d

**5-20-0656 (NANETTE REED)
DECEMBER 13, 2021**

CORRESPONDENCE

Nanette Reed (applicant).....2

December 10, 2021

408 Sherman Canal, Venice, CA (APN:4227015022)

Application No. 5-20-0656

W15D Hearing Date: 12/15/21

Staff: C. Seifert-LB

Applicant: Eyal Avraham

Barbara Paderni

Home Owner :Nannette Reed

Please find proposed response to the Staff Report issued 12/3/21 where we address the 15 Conditions of Approval stated and provide our comments for revisions and/or reconsideration:

Major Premise that this proposed project is “new development” is flawed. As the staff report cites the language of Section 30212 of the Coastal Act on Page 5, new development does not include “reconstruction of a single-family residence: provided that the reconstructed residence shall not exceed either the floor area, height or bulk of the former structure by more than 10 percent...” Under the Findings detailed on pg11-12 IV(A), the current existing single house is 1688 sq feet and the project proposed a 74 sq ft addition to the alley -facing side of second floor. Therefore, this new addition of square footage IS LESS THAN 10% OF EXISTING FLOOR AREA AND BULK OF FORMER STRUCTURE. The fact that all of these conditions below are based on a finding that this is a new development under Section 30212 is a false premise. In the interests of moving this project forward however, we have outlined the conditions we would consent to with required revisions on those we object to. This does not waive the homeowners’ rights to contest the legal and factual findings that the Staff Report is based upon should that be required.

1- A.i. 1 Submittal of Revised Plans to address waterproofing measures designed/submitted by Structural Engineer

- As the City of Los Angeles codes and regulations do not currently have any required measures to address **retrofitting** existing structures to provide safety measures to allow for sea level rise (projected sea level rise of 2.89 feet above the lowest finished existing floor elevation and located **3.91 feet above** the current mean sea level as of Nov. 18, 2021), we request that the Coastal Commission does not make new retrofitting requirements on their own accord. Although this project may be considered a new development under the “act” it is a small second story addition to an existing single-family home and this commission must consider what is reasonable and cost efficient as opposed to requiring total demolition of the existing structure to accommodate waterproofing measures as would be possible if it was “new” construction.
- The four safety measures proposed in the Staff Report, III.(1)(A)(i)- page 5, report are really not economically feasible or not applicable to an existing structure. The Staff report cites for other cases (pg 21, FN #2), none of which are applicable to the facts of this project. All are NEW CONSTRUCTION, without any modification to existing structures and the ones that allow waivers for Protective Shore Devices have no relationship to waterproofing requirements for raised sea level hazards. The Staff Report indicates other Venice projects have been required to retrofit with water proofing measures including:

- 1) Raising the elevation of the total existing structure the 2.89 feet. There is not one single house in the Venice area built on stilts to withstand an approximate 3 foot raise sea level rise. The cost to elevate the whole existing house exceeds the gross value of the house, even if it could be accomplished without destroying parts of the existing structure. This is Not feasible.
- 2) Construction of stem walls designed to resist hydrostatic pressure and waterproofing 2.8 feet above current lowest level. This option can only be done on New Construction before and during the laying of foundation and construction of structural walls. The 408 project already has an existing first and second floor and no part of the proposed addition is on the first floor. More than half the first floor is also raised foundation, not slab on grade, making this option impossible.
- 3) Installation of sump pumps in sub-surface structures. I am not sure what this means for the 408 project - does it require a sump pump in the living room/kitchen and each downstairs bedroom? Furthermore, since there is no city storm drain system the sump pump could only release the water into the back alley which would have no impact in reducing the amount of flooded water on the property during any sea level rise independent of where the sump pump would be located, either inside first floor or outside on adjacent structure wall.
- 4) The final option, installing a perforated drainpipe wrapped with gravel and filter fabric to capture infiltrating water is likely the most cost effective and manageable where there is raised foundation and around the two sides of the rear portion of first floor that is slab on grade. HOWEVER, no licensed engineer would opine that this solution would have any viable impact if there was a sea level rise of 3 feet. The flooding water would permeate the pipe and more water flow would take its place. This solution functions like a French drain (which already exists on front left section of the first floor) and could only have an impact on very low-level flooding.
- 5) Another option would be to maintain sufficient sandbags on the property to surround the first-floor slab on grade portion which would prevent damage on 1-1 ½ feet of flooding
- 6) **The best and most reasonable option is to waive any requirement for retrofitting for sea level rise but instead have homeowner agree to implement any retrofitting standards that will be developed by City of Los Angeles in the years to come, just as retrofitting standards were devised for potential earthquake damage.**

2. Development Setbacks and Building Height.

Consent to condition.

3. Permeable Yard Area.

We consent to the condition EXCEPT the requirement that the homeowner provide an exhibit prepared by a licensed surveyor indicating that the back rear yard maintains the required 90 sq feet of permeable area. The plans as submitted already show a permeable rear yard area of more than 300 feet, which is additional to the front facing permeable area of 360 sq ft. The submitted plans clearly show the required minimum of 450 sq ft of permeable area. It is unreasonable to add extra cost (\$3-4K) to the homeowner to hire a licensed Surveyor to mark out 90 sq feet of the backyard area which is currently permeable space in the plans submitted. (See also Revised Plan A 1.1 submitted herein) Note that the yard is already fully landscaped with artificial turf and drought resistant plants and the new second story small addition will have no impact on current landscaping)

4. Permit Compliance.

Consent to Condition

5. Landscaping- Drought Tolerant, Non-Invasive Plants.

The yard at this project is already fully landscaped and there should be no requirement to remove all the current landscaping to bring the lot to dirt. The proposed small second story addition will have no impact on the current landscaping and the cost to the homeowner to hire a landscaper to prepare plans is unreasonable. The current backyard area which will remain as permeable area is 80% artificial turf, there are two flowering pear trees (20 years old) and drought tolerant hedges on one side with some flowering pots and rocks with drip system. **The homeowner would agree that if the current landscaping is ever changed, she would comply with this condition as to new landscaping to be added.**

6. Water Quality.

Consent to Condition however under 6(B)(4) there is no City storm drain system in existence for this area of canals, so any runoff is directed to the alleyway behind the house.

7. Construction Staging Plan

Consent to this Condition

8. Bird Strike Prevention.

Consent to this Condition.

**9. Parking and residential Density.
(Revise Design A-1.1)**

Consent to this Condition. We are providing three parking spaces in the rear area, two are existing and the third will be parallel to the back alley for a compact car. (See revised plans for new parking dimensions and location)

10-13. Consent to Conditions.

14. Deed Restriction

Consent to new Deed Restriction to supersede one from 1991 based on the revised conditions outlined in this response.

15. Removal of Unpermitted Development.

The staff report is INCORRECT in citing that the Tufts Shed currently in backyard area requires a permit and therefore it is an unpermitted development. This is not a structure and pursuant to LADBS; a building permit is not required for "one-story detached accessory buildings used as tool and storage sheds, playhouses and similar uses, provided the floor area does not exceed 120 square feet" The current shed is 10'w x 8' d or a total of 80 sq ft. (see photo attached) so no permit is required and the shed will remain in the backyard as shown on Revised Design A-1.1)

Barbara Paderni
818 205 8201

PERMEABLE AREAS

ADDRESS/LEGAL
SITE ADDRESS 408 W SHERMAN CL
ZIP CODE 90291
PIN NUMBER 105A147 52
LOT/PARCEL AREA (CALCULATED) 2,850.1 (SQ FT)
THOMAS BROTHERS GRID PAGE 671 - GRID H7
ASSESSOR PARCEL NO. (APN) 4227015022
TRACT SHORT LINE BEACH VENICE CANAL SUBDIVISION NO. 1
MAP REFERENCE M B 7-126/127
BLOCK 52
LOT 38
ARB (LOT OUT OF REFERENCE) NONE
MAP SHEET 105A145
MAP SHEET 105A147

JURISDICTIONAL
COMMUNITY PLAN AREA VENICE
AREA PLANNING COMMISSION WEST LOS ANGELES
NEIGHBORHOOD COUNCIL VENICE
COUNCIL DISTRICT CD 11 - MIKE BONIN
CENSUS TRACT # 2739.02
LADBS DISTRICT OFFICE WEST LOS ANGELES
BUILDING PERMIT INFO VIEW

PLANNING AND ZONING
SPECIAL NOTES NONE
ZONING FW-1-0
ZONING INFORMATION (2I) ZI-2406 DIRECTOR'S
INTERPRETATION OF THE VENICE SP FOR SMALL LOT SUBDIVISION
AREA IN THE CITY OF LOS ANGELES
ZONING INFORMATION (2I) ZI-2452 TRANSIT PRIORITY
AREA IN THE CITY OF LOS ANGELES
GENERAL PLAN LAND USE LOW MEDIUM II RESIDENTIAL
GENERAL PLAN NOTES (S) YES
HILLSIDE AREA (ZONING CODE) NO
SPECIFIC PLAN AREA LOS ANGELES COASTAL TRANSPORTATION CORRIDOR
SUBAREA NONE
SPECIFIC PLAN AREA VENICE COASTAL ZONE
SUBAREA VENICE CANALS
HISTORIC PRESERVATION REVIEW NO
HISTORIC/PLACESLA VIEW
CDO: COMMUNITY DESIGN OVERLAY NONE
CPO: COMMUNITY PLAN IMP. OVERLAY NONE
SUBAREA NONE
CUG: CLEAN UP-GREEN UP NONE
NCSO: NEIGHBORHOOD STABILIZATION OVERLAY NO
POD: PEDESTRIAN ORIENTED COMMUNITIES TIER 1
RFA: RESIDENTIAL FLOOR AREA DISTRICT NONE
S: SGN DISTRICT NO
STREETSCAPE NO
ADAPTIVE REUSE INCENTIVE AREA NONE
AFFORDABLE HOUSING LINKAGE FEE
RESIDENTIAL MARKET AREA HIGH
NON-RESIDENTIAL MARKET AREA
TRANSIT ORIENTED COMMUNITIES (TOC) TIER 1

ASSESSOR
APN AREA (CO. PUBLIC WORKS)* 0.065 (AC)
USE CODE 0100 - RESIDENTIAL - SINGLE FAMILY RESIDENCE
BUILDING 1
YEAR BUILT 1924
BUILDING CLASS D7C
NUMBER OF UNITS 1
NUMBER OF BEDROOMS 4
NUMBER OF BATHROOMS 3
BUILDING SQUARE FOOTAGE 1,688.0 (SQ FT)

ADDITIONAL	
AIRPORT HAZARD	NONE
COASTAL ZONE	CALVO EXCLUSION AREA
COASTAL ZONE	COASTAL ZONE COMMISSION AUTHORITY
COASTAL ZONE	DUAL JURISDICTIONAL AREA NOT
FARMLAND AREA	HAZARD
URBAN AGRICULTURE INCENTIVE ZONE	YES
VERY HIGH FIRE HAZARD SEVERITY ZONE	NO
FIRE DISTRICT NO. 1	NO
FLOOD ZONE	NONE
WATERCOURSE	NO
HAZARDOUS WASTE /	BORDER ZONE PROPERTIES NO
METHANE HAZARD SITE	METHANE ZONE
HIGH WIND VELOCITY AREAS	NO
SPECIAL GRADING AREA (BOE BASIC GRID MAP A-13372)	NO
Oil WELLS	NONE

[illegible]

COURT A

A map of Venice, California, showing the Venice Canal, Venice Beach, and surrounding areas. A red pin marks the location of the Venice Beach City Club Apartments. The map includes labels for various streets, landmarks, and beaches. The Venice Canal is shown in blue, and the Pacific Ocean is shown in light blue. The Venice Beach City Club Apartments are marked with a red pin and labeled. Other landmarks include Muscle Beach, The Promenade Marina, City Club Apartments, and the Venice Beach City Club. The map also shows the Venice Beach City Club, the Venice Beach City Club, and the Venice Beach City Club. The map is a detailed street map of Venice, California, showing the Venice Canal, Venice Beach, and surrounding areas. A red pin marks the location of the Venice Beach City Club Apartments. The map includes labels for various streets, landmarks, and beaches. The Venice Canal is shown in blue, and the Pacific Ocean is shown in light blue. The Venice Beach City Club Apartments are marked with a red pin and labeled. Other landmarks include Muscle Beach, The Promenade Marina, City Club Apartments, and the Venice Beach City Club. The map also shows the Venice Beach City Club, the Venice Beach City Club, and the Venice Beach City Club.



PREPARED BY:
INNOVA CREATIVE SOLUTION inc.
15500 ERWIN ST., STE 260
VAN NUYS, CA 91411
CELL : 818 - 4023906

CHECK AND VERIFY ALL DIMENSIONS BEFORE PROCEEDING WITH THE WORK. REPORT DISCREPANCIES TO THE DESIGNER PREPARING THE DRAWINGS. ALL CONSTRUCTION SHALL CONFORM TO THE C.B.C.

PROPOSED : SECOND FLOOR MASTER BEDROOM ADDITION
PROPERTY OWNER : NANETTE REED
LOCATED AT: 408 W SHERMAN CANAL, VENICE CA 90291
PHONE : 310-305-7454

SHEET:

A-1.1

PLOT PLAN
PERMEABLE AREA

