

**CALIFORNIA COASTAL COMMISSION**

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



**Th14b**

**A-5-VEN-20-0037 (HOLZMAN)**

**FEBRUARY 5, 2021**

**CORRESPONDENCE**

1. Richard Reinach
2. Mark Boal
3. Grant Myers
4. Joel Stillerman
5. Steven Ehrlich
6. Tiffany Rochelle & Paul Hibler
7. Fred Gaines
8. Citizens Preserving Venice

30 January 2021

California Coastal Commission  
South Coast District Office  
301 E. Ocean Boulevard, Suite 300  
Long Beach, CA 90802  
Attn: Coastal Commission

Re: **Application No. A-5-VEN-20-0037** (Holzman Living Trust, Venice)

Dear Commissioner:

I am a local Venice resident writing to express my support for the Holzman's project on Palms Boulevard.

The Holzmans have lived in Venice for decades and the duplex they a plan to build will be a wonderful addition to our neighborhood. The duplex is entirely in keeping with the scale, taste and style of the neighborhood. Critically, the two apartments + ADU actually add sorely needed housing to our local rental inventory. And the ADU addresses a particular need for accessibly priced housing for the local workforce who have largely been priced out of the Venice rental market.

I urge you to approve the project

Sincerely,

Richard Reinach  
728 Superba Avenue  
Venice, CA 90291

30 January 2021

California Coastal Commission  
South Coast District Office  
301 E. Ocean Boulevard, Suite 300  
Long Beach, CA 90802  
Attn: Coastal Commission

Re: **Application No. A-5-VEN-20-0037** (Holzman Living Trust, Venice)

Dear Commissioner:

I am a local Venice resident writing to express my support for the Holzman's project on Palms Boulevard.

The Holzmans have lived in Venice for decades and the duplex they a plan to build will be a wonderful addition to our neighborhood. The duplex is entirely in keeping with the scale, taste and style of the neighborhood. Critically, the two apartments + ADU actually add sorely needed housing to our local rental inventory. And the ADU addresses a particular need for accessibly priced housing for the local workforce who have largely been priced out of the Venice rental market.

I urge you to approve the project

Sincerely,

Mark Boal  
761 Milwood Avenue  
Venice, CA 90291

**Seifert, Chloe@Coastal**

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**From:** SouthCoast@Coastal  
**Sent:** Monday, February 1, 2021 11:00 AM  
**To:** Seifert, Chloe@Coastal  
**Subject:** FW: Public Comment on February 2021 Agenda Item Thursday 14b - Application No. A-5-  
VEN-20-0037 (Holzman Living Trust, Venice)

**From:** Grant Myers <grantmyers@mac.com>  
**Sent:** Saturday, January 30, 2021 10:51 PM  
**To:** SouthCoast@Coastal <SouthCoast@coastal.ca.gov>  
**Subject:** Public Comment on February 2021 Agenda Item Thursday 14b - Application No. A-5-VEN-20-  
0037 (Holzman Living Trust, Venice)

30 January 2021

California Coastal Commission  
South Coast District Office  
301 E. Ocean Boulevard, Suite 300  
Long Beach, CA 90802  
Attn: Coastal Commission

Re: **Application No. A-5-VEN-20-0037** (Holzman Living Trust, Venice)

Dear Commissioner:

I am a local Venice resident writing to express my support for the Holzman's project on Palms Boulevard.

The Holzmans have lived in Venice for decades and the duplex they plan to build will be a wonderful addition to our neighborhood. The duplex is entirely in keeping with the scale, taste and style of the neighborhood. Critically, the two apartments + ADU actually add sorely needed housing to our local rental inventory. And the ADU addresses a particular need for accessibly priced housing for the local workforce who have largely been priced out of the Venice rental market.

I urge you to approve the project

Sincerely,

Grant Myers  
1327 Preston Way  
Venice, CA 90291

**Seifert, Chloe@Coastal**

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**From:** SouthCoast@Coastal  
**Sent:** Monday, February 1, 2021 11:06 AM  
**To:** Seifert, Chloe@Coastal  
**Subject:** FW: Public Comment on February 2021 Agenda Item Thursday 14b - Application No. A-5-  
VEN-20-0037 (Holzman Living Trust, Venice)

**From:** Joel Stillerman <jstillerman@icloud.com>  
**Sent:** Sunday, January 31, 2021 10:04 AM  
**To:** SouthCoast@Coastal <SouthCoast@coastal.ca.gov>  
**Subject:** Public Comment on February 2021 Agenda Item Thursday 14b - Application No. A-5-  
VEN-20-0037 (Holzman Living Trust, Venice)

30 January 2021

California Coastal Commission  
South Coast District Office  
301 E. Ocean Boulevard, Suite 300  
Long Beach, CA 90802  
Attn: Coastal Commission

**Re: Application No. A-5-VEN-20-0037** (Holzman Living Trust, Venice)

Dear Commissioner:

I am a local Venice resident writing to express my support for the Holzman's project on Palms Boulevard.

The Holzmans have lived in Venice for decades and the duplex they a plan to build will be a wonderful addition to our neighborhood. The duplex is entirely in keeping with the scale, taste and style of the neighborhood. Critically, the two apartments + ADU actually add sorely needed housing to our local rental inventory. And the ADU addresses a particular need for accessibly priced housing for the local workforce who have largely been priced out of the Venice rental market.

I urge you to approve the project

Sincerely,

Joel Stillerman  
719 Superba Avenue  
Venice, CA 90291

## Seifert, Chloe@Coastal

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**From:** SouthCoast@Coastal  
**Sent:** Tuesday, February 2, 2021 10:22 AM  
**To:** Seifert, Chloe@Coastal  
**Subject:** FW: Public Comment on February 2021 Agenda Item Thursday 14c - Application No. A-5-  
VEN-20-0039 (Holzman Living Trust, Venice)

-----Original Message-----

From: nancy griffin <griffin.n@me.com>  
Sent: Monday, February 1, 2021 7:12 PM  
To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>  
Cc: Steven Ehrlich <sehrlich@eyrc.com>  
Subject: Public Comment on February 2021 Agenda Item Thursday 14c - Application No. A-5-  
VEN-20-0039 (Holzman Living Trust, Venice)

30 January 2021

California Coastal Commission  
South Coast District Office  
301 E. Ocean Boulevard, Suite 300  
Long Beach, CA 90802  
Attn: Coastal Commission

Re: Application No. **A-5-VEN-20-0037** (Holzman Living Trust, Venice)

Dear Commissioner:

As a Venice resident since 1979, I am writing to express my support for the Holzman project on Palms Boulevard.

I live next door to the site, and am familiar with the excellent work of the project's architect Barbara Bestor. I am confident that the proposed duplex will be a wonderful addition to our neighborhood.

I urge you to approve the project.

Sincerely,

Steven Ehrlich  
Founding Partner, EYRC Architects  
700 Palms Boulevard  
Venice, CA 90291

**Seifert, Chloe@Coastal**

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**From:** TIFFANY ROCHELLE <tiffrochelle@mac.com>

**Sent:** Wednesday, February 3, 2021 8:07 PM

**To:** SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

**Subject:** Public Comment on February 2021 Agenda Item Thursday 14c - Application No. A-5-VEN-20-0039 (Holzman Living Trust, Venice)

**Re: Application No. A-5-VEN-20-0037** (Holzman Living Trust, Venice)  
Project location: 710 E. Palms Blvd., Venice, City of Los Angeles  
APN: 4241-015-021

Dear Commissioner:

I am a local Venice resident for over 24 years writing to express my support for the Holzman's project on Palms blvd here in Venice.

The Holzmans have lived in Venice for many years and the duplex they want to build will be a nice addition to our neighborhood as it is consistent with the scale, taste and style of the neighborhood.

The two apartments and ADU add desperately needed housing to our local rental inventory. And the ADU addresses the need for lower priced housing for the local workforce who have mostly been priced out of the Venice rental market.

I recommend that the project be approved.

Sincerely,

Tiffany Rochelle & Paul Hibler  
1916 Lincoln Blvd.  
Venice, Ca 90291

FRED GAINES  
SHERMAN L. STACEY  
LISA A. WEINBERG\*  
REBECCA A. THOMPSON  
NANCI SESSIONS-STACEY  
KIMBERLY A. RIBLE  
ALICIA B. BARTLEY

\* a professional corporation

LAW OFFICES OF  
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16633 VENTURA BOULEVARD, SUITE 1220  
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INTERNET: WWW.GAINESLAW.COM

February 5, 2021

**ORIGINAL VIA U.S MAIL**

**VIA EMAIL: [chloe.seifert@coastal.ca.gov](mailto:chloe.seifert@coastal.ca.gov)**

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

**Th14b & Th14c**

Re: Appeal Nos. A-5-VEN-20-0037 & A-5-VEN-20-0039  
710 E. Palms Blvd. & 714-716 E. Palms Blvd., Venice  
Meeting Date: February 11, 2021; Agenda Item Nos. Th14b & Th14c  
**Project Support**

Dear Honorable Commissioners:

This office represents Eli and Stephanie Holzman of the Holzman Living Trust (“Holzman”), the owner of abutting properties located at 710 E. Palms Blvd. and 714-716 E. Palms Blvd. in Venice (the “Properties”). Our client sought and obtained local coastal development permits from the City of Los Angeles (the “City”) that authorized the demolition of two existing duplexes and the construction of two single family homes, each with an accessory dwelling unit (“ADU”). Upon a third-party appeal and substantial issue finding by the Coastal Commission, Holzman revised the projects to maintain duplexes on both Properties and to add an ADU to each, such that the four (4) existing dwelling units would be replaced by six (6) units (the “Revised Projects”). Staff recommends approval of the Revised Projects and Holzman agrees with the de novo Staff Reports and all proposed conditions. **For the reasons contained in this correspondence and to be presented at the Commission’s February 11, 2021 hearing, Holzman urges the Commission to approve Coastal Development Permit Nos. A-5-VEN-20-0037 and A-5-VEN-20-0039.**<sup>1</sup>

**A. PROJECT BACKGROUND**

The projects sit side by side on two modestly sized 5,299 square foot parcels, approximately .75 miles from the beach in the Milwood subarea of Venice on East Palms Boulevard. The Properties are zoned R2-1 and designated for Multi-Family Residential – Low Medium I uses by the certified Venice Land Use Plan (“LUP”). The surrounding area is characterized by a mix of single-family and multi-family uses.

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<sup>1</sup> Although these are two separate permits, the parties, issues, and Staff Reports are virtually identical and, therefore, this letter responds to staff’s recommendation for both Projects.



In June 2020, the City approved Case Nos. DIR-2018-7237-CDP-MEL and DIR-2018-7251-CDP-MEL, both of which involved the demolition of existing duplexes and the construction of two new single family homes, each with an ADU (“Original Projects”). Extensive findings were made that the Original Projects conformed with Chapter 3 policies, the City’s zoning, and the certified Venice Land Use Plan (“LUP”). No appeals were filed at the local level.

Following the City’s approval, on August 6, 2020 Citizens Preserving Venice (Sue Kaplan or “Appellant”) appealed the Original Projects to the Commission citing concerns with an alleged loss of density (the “Appeals”).<sup>2</sup> Specifically, the Appeals argue that replacing two duplexes with two single family residences and two ADUs would have an adverse impact on the multi-family housing supply, that single family residences are incompatible with the land use designation and the community character, and that small ADUs are an inadequate substitute for a dwelling unit because they “cannot house a family.”

## **B. THE PROJECTS WERE REVISED TO ADDRESS ALL APPEAL ARGUMENTS**

Even though not required to maintain density under any applicable state or local law<sup>3</sup>, Holzman immediately and voluntarily modified the Original Projects to address and dispense with arguments contained in the Appeals. As illustrated below, both existing duplexes will now be replaced with two new duplexes of commensurate size and also incorporate an ADU. With approval, there will be six (6) units to replace the existing four (4) units, resulting in a net gain of two (2) dwelling units. In addition, parking was bolstered from four (4) spaces to five (5) spaces for each duplex to comply with minimum parking requirements (the “Revised Projects”).<sup>4</sup>

### **710 E. PALMS BLVD.**

Revisions for 710 E. Palms Blvd. involved redesigning the project to accommodate a duplex in lieu of the single-family residence, retaining an ADU, and adding an additional parking space. The existing duplex is 1,445 square feet and the proposed duplex is 3,192 square feet, plus an attached 263 square foot ADU. The first floor ADU includes one bedroom, one bathroom, a kitchen, window glass door, and a side-yard entrance separate from the other units.

<b>Original Project</b>	<b>Revised Project</b>
Single-Family Residence (2,850 sq. ft.) ADU (191 sq. ft.) 2 Car Garage + 2 on-site parking spaces  <i><b>2 units → 2 units w/ 4 parking spaces</b></i>	Duplex (3,192 sq. ft.) ADU (263 sq. ft.) 2 Car Garage + 3 on-site parking spaces  <i><b>2 units → 3 units w/5 parking spaces</b></i>

<sup>2</sup> The Appellant was involved in the City approval process, but never raised the loss of density issue until the Appeals to the Commission.

<sup>3</sup> Although not specifically called out in the Appeals, it is no secret that the genesis for this “no net loss” of density argument is the recent passage of SB 330. The Projects are explicitly exempted from SB 330 because they were deemed complete in March 2019.

<sup>4</sup> Holzman also worked with staff on project changes to address future sea level rise. Although not discussed in detail here, Holzman incorporated those conditions into the Revised Projects and concurs with those conditions.

**714-716 E. PALMS BLVD.**

Revisions for 714-716 E. Palms Blvd. involved redesigning the project to accommodate a duplex in lieu of the single-family residence, retaining an ADU, and adding an additional parking space. The existing duplex is 1,969 square feet and the proposed duplex is 1,540 square feet, plus an attached 310 square foot ADU. The first floor ADU includes one bedroom, one bathroom with a window, a kitchen, a covered deck accessed through sliding glass doors, and a side-yard entrance that is separate from the other units.

<b>Original Project</b>	<b>Revised Project</b>
Single-Family Residence (1,321 sq. ft.) ADU (437 sq. ft.) 3 Car Garage + 1 on-site parking spaces	Duplex (1,540 sq. ft.) ADU (310 sq. ft.) 4 Car Garage + 1 on-site parking spaces
<b><i>2 units → 2 units w/ 4 parking spaces</i></b>	<b><i>2 units → 3 units w/5 parking spaces</i></b>

The modifications made to the Original Projects directly address claims in the Appeals regarding an alleged adverse trend in loss of housing density. The Revised Projects replace what were to be single family homes with duplexes for purposes of maintaining four housing units that are of similar size to the existing duplexes. And with the addition of two ADUs, Holzman is actually increasing the Venice housing stock by two dwelling units.

In addition, the Revised Projects similarly dispense with Appellant's claims regarding the Original Projects' compatibility with neighborhood character and land use designation, as well as cumulative impacts that may result from eliminating multi-family units to make way for single-family residences. The Revised Projects now maintain multi-family duplexes on lots zoned for multi-family uses in the certified LUP and will not, therefore, "set a precedent" or contribute to a trend in "downzoning" the area. The Venice housing stock is being preserved and the duplexes are inarguably consistent with the zoning, land use designation, and surrounding mix of housing.

With respect to the previously proposed ADUs, the Appeals argue that the "small size of both ADUs cannot be considered as a real dwelling unit" because "they are extremely unlikely to be used as separate unit as that size would not adequately accommodate a family." In other words, the claim is that an ADU is an inadequate replacement for a larger duplex unit. That argument (which is not founded in or supported by any state or local law) is addressed by the Revised Projects because the ADUs are no longer replacing units; the Revised Projects replace duplex with duplex and add two ADUs where none previously existed. Families can be adequately accommodated by all four duplexes. And with respect to the smaller ADUs, there is no legal requirement that they be of sufficient size to accommodate a family. Here, the ADUs have been thoughtfully designed with separate entrances, windows, outdoor space, glass doors, bedrooms, and kitchens and provide a much needed more-affordable housing option for a single person or couple.

**C. CONCLUSION**

Holzman has worked tirelessly with staff to ensure that the Revised Projects continue to be consistent with Chapter 3 of the Coastal Act, while also addressing each and every issue raised in the underlying Appeals. The Revised Projects not only replace four existing units with four equivalent dwelling units, they go even further by offering two additional units that would be suitable for singles or couples that desire a more affordable housing option.

**On behalf of Holzman, we ask for your support for the Staff Recommendation for Approval of the Revised Projects with conditions.** Thank you for your consideration.

Sincerely,

GAINES & STACEY LLP

***Fred Gaines***

By

FRED GAINES

cc: All Coastal Commissioners

**From:** Robin Rudisill <wildrudi@icloud.com>  
**Sent:** Friday, February 5, 2021 4:56 PM  
**To:** SouthCoast@Coastal; Seifert, Chloe@Coastal  
**Cc:** Hudson, Steve@Coastal; Vaughn, Shannon@Coastal; Jason Douglas  
**Subject:** Th14b--A-5-VEN-20-0037 & Th14c--A-5-VEN-20-0039  
**Attachments:** PALMS EXHIBITS.pdf

**Joint letter for:**

**Th14b**  
**A-5-VEN-20-0037**  
**710-712 Palms Ave**

**Th14c**  
**A-5-VEN-20-0039**  
**714-716 Palms Ave**

**Commissioners and Staff,**

It is not our intent to stop this project. We appreciate the applicant's willingness to review the appeal and make positive changes. However, we believe that a new set of plans should be requested that reflect both the intent and feasibility of maintaining the existing density of the properties and the multi-family character of the neighborhood.

**We have previously expressed our concern about the feasibility and functionality of the proposed revised plans for the projects at 710-712 Palms and 714-716 Palms.**

**Due to our continued concern, we reviewed the proposed revised plans in more detail. Based on that review, we are very concerned that these projects may not maintain density or be compatible with the surrounding multi-family character of the neighborhood.**

**We also have a concern that the unit sizes for both ADUs as well as the duplex units at the 714-716 Palms property are not of a size that the Commission has stated in the past, with respect to ADUs in Venice and Hermosa, are livable units for a couple or small family.**

**CONFIGURATION OF POOL/SPA & YARD VS. UNIT SIZES FOR 714-716 PALMS**

**For 714-716 Palms, we specifically asked the applicant about the reduction of two bedrooms and 210 square feet of living area (excludes stairs) from what is existing to the new revised plans, and they did not reply. We also asked staff about these reductions and were told that the applicant gave them the following response regarding the living area size reduction for the new duplex proposed at 714-716 Palms:**

***"The minor reduction in square footage is for the following reasons:***

- to accommodate the 210 sq. ft. covered deck, without increasing the footprint***
- so the front setback from Palms Blvd is compatible with the existing community and takes into consideration aesthetics and scenic preservation (in order to satisfy the Venice Specific Plan requirements)***
- reduces the footprint of the existing building in order to accommodate additional parking***
- increases the permeable yard area to satisfy the low impact development requirements"***

**However, the more obvious reason appears to be that the number of bedrooms and square footage of the property is proposed to be reduced from what is existing in order to make room for a pool/spa and yard that takes up more than half of the lot area. See attached EXHIBIT C for a comparison of the pool/spa and yard space vs. the structure. It appears that the main reason for the reduced/relatively small amount of living**

space is to make ample room for the 962 square foot pool/spa and large yard. The pool/spa, together with the total yard surrounding the pool and the outdoor shower, totals approximately 2,700 square feet, which takes up over half of the 714-716 Palms lot area, thus squeezing the amount of footprint available for the living areas and making them unreasonably small.

**For the project proposed for 714-716 Palms, the pool/spa by itself is larger than either of the dwelling units in the duplex and the ADU, by at least 232 square feet, as follows:**

**Pool/spa—962 square feet (this number excludes 1,700 square feet of surrounding yard)**

**Unit 1—718 square feet**

**Unit 2—730 square feet**

**ADU—310 square feet**

To reduce the number of bedrooms by two, and to reduce the square footage of 1,968 square feet for the existing duplex to 1,758 square feet for both the new duplex and ADU together, for the purpose of a pool/spa and yard that would take up over ½ of the lot and that would be for just the benefit of the residents in the three new smaller units on that lot, is not logical or reasonable. It makes no sense and begs the question whether the pool/spa and the 714-716 Palms yard would be accessible and available for the use of the residents at 710-712 Palms.

Also, the ADU at 714-716 Palms is so small that it is not a functional unit, and adding it requires the other duplex units to be even smaller than they otherwise would be in order to keep the pool/spa and yard the same size as in the original City-approved plans, over ½ of the lot area.

It would only make sense to have a smaller, more reasonable-sized pool/spa and yard so that the dwelling units could be of a more reasonable, normal size, with more livable space in each unit. Also, the number of bedrooms should not be decreased (the existing duplex has 2 more bedrooms than the proposed duplex). On a lot this size, in an area where livable space is a premium, to take so much of the lot for the pool/spa and outdoor space doesn't make sense, especially if the outdoor space and pool/spa are intended for use only by the residents of that lot.

#### LARGER DUPLEX DWELLING UNITS VS. ADDITION OF ADUs

We understand that a project with a duplex unit plus an ADU seems preferable over a project with a only a duplex unit, but when considering the size of the units it may not be. Also, we understand that Staff would naturally appreciate the addition of these two ADUs, which would appear to add density. However, at 200 square feet and 250 square feet of living area, the two ADUs are not livable for a couple or family, are too small to impact housing density and are not likely to be used for rental purposes. Putting weight on the potential benefits to this project of the tiny ADUs distracts from the real issues.

#### NEW REVISED PLANS ARE SAME FOOTPRINT/BASIC STRUCTURE AS ORIGINAL PLANS APPROVED BY THE CITY

The original City approved plans have been modified into three units in the same footprint as the original plans for a single family dwelling and ADU on each lot. Because the basic structure, layout and footprint are the same, minimal wall changes would be needed in order to change the structures from duplex and ADU to single family dwelling and ADU. In the revised plans they have added some partition walls and demising walls in order to separate the units. However, even if built according to the proposed revised plans, we have been told by a local architect that because the basic structure and footprint are the same and due to the way the revised plans are designed, a future owner could fairly easily modify the interior of the buildings in order to change the structures back to the original single-family dwelling plans approved by the City.

See EXHIBITS A and B for a comparison of original City approved plans to the proposed revised plans for each property.

#### POSSIBILITY OF A COMPOUND RATHER THAN MAINTAINING DENSITY

In addition, in reviewing the original plans in more detail we can see that the two properties together could serve as a compound, with the pool/spa and large half lot yard area used by both properties. If successful in creating such a compound, that would make this property a one of a kind, extremely valuable property, with what we believe would be one of the largest pools in the Venice Coastal Zone, shared by the two lots. It would certainly be worth the trouble or extra expense in getting there, as such a compound would not be approved in the current housing environment when maintaining density is so important. It should be noted that the Commission specifically denied a similar project at 416-422 Grand Blvd where it appeared the lots were intended for a compound, with structures on each lot surrounding a shared pool, to be inhabited by a single family.

Increasing our concern is what we believe are serious process issues and lack of internal controls between City and State. When the Commission voids a City CDP upon declaring Substantial Issue, the City does not take the voided CDP off of their planning system or indicate in any way that the City CDP is no longer effective. Also, when the Commission approves a new state permit on de novo, there is no indication on the City's planning system that there is a new state CDP. This can lead to confusion in the planning department and Department of Building and Safety, and in the past we have seen the voided City plans used as clearance for the building permit. At a minimum we hope you will follow up on this problem, which has caused many problems in the past. It should be noted that the City was fine with the original plans with a pool/spa and yard taking up more than half of the lot area as well as the decreased square footage/density, and the original CDP and plans are still available on the City Planning system.

#### PARKING

In addition, the parking is unworkable and infeasible and will more than likely result in residents parking on the street due to tandem parking between different units and also due to "double tandem parking," having to move two cars in order to use the first car. In the past double tandem parking has not been allowed in the Coastal Zone. See Exhibits D and E for a detailed discussion of the parking issues.

#### FINDINGS

Please see EXHIBITS D and E for some of our specific findings. In and of themselves each thing is not a significant concern, but in the aggregate they make us question the viability and feasibility of the projects as designed as well as the overall intent.

#### CONCLUSION

There are significant anomalies and inconsistencies in these proposed revised plans. It is difficult to believe that the plans as described in the project description would be functional or even feasible. We are certainly not looking to stop this project, but there are enough concerning factors that we are asking you to make sure that the multitude of issues are addressed. Also, as the proposed revised plans are not reasonable or feasible it would not be fair to the community or even effective to have to pursue modified projects if the projects are changed back to the original plans. The plans and conditions that you approve should assure that that would be prevented.

All parties are well aware that the Commission does not usually look at the interior of a project--floor plans or size of units. There is no law against less than optimal design and there isn't a rule that says a project cannot maximize outdoor space and minimize indoor space. However, in this case we believe the issues go beyond just size and design. The plans as proposed are infeasible and the functionality of the units is compromised.

Also, the ability for the proposed structures to be fairly easily modified so that they would reflect the original City approved plans for the single family dwellings instead of the duplexes is concerning, coupled with the many issues with the proposed plans that show that they are not accurate, reasonable, livable or even feasible.

Please look deeper here. We know that you are concerned about maintaining density and do not support projects that would or could replace multi-family dwellings with single-family dwellings, let alone

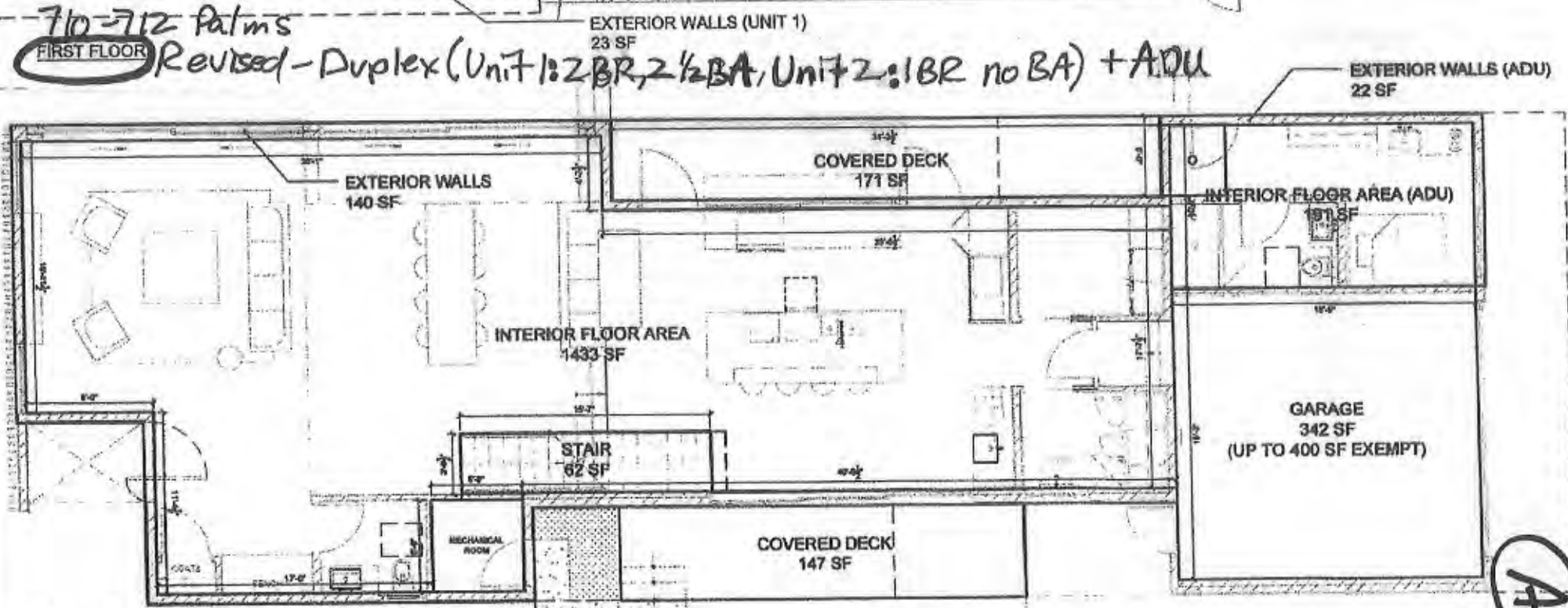
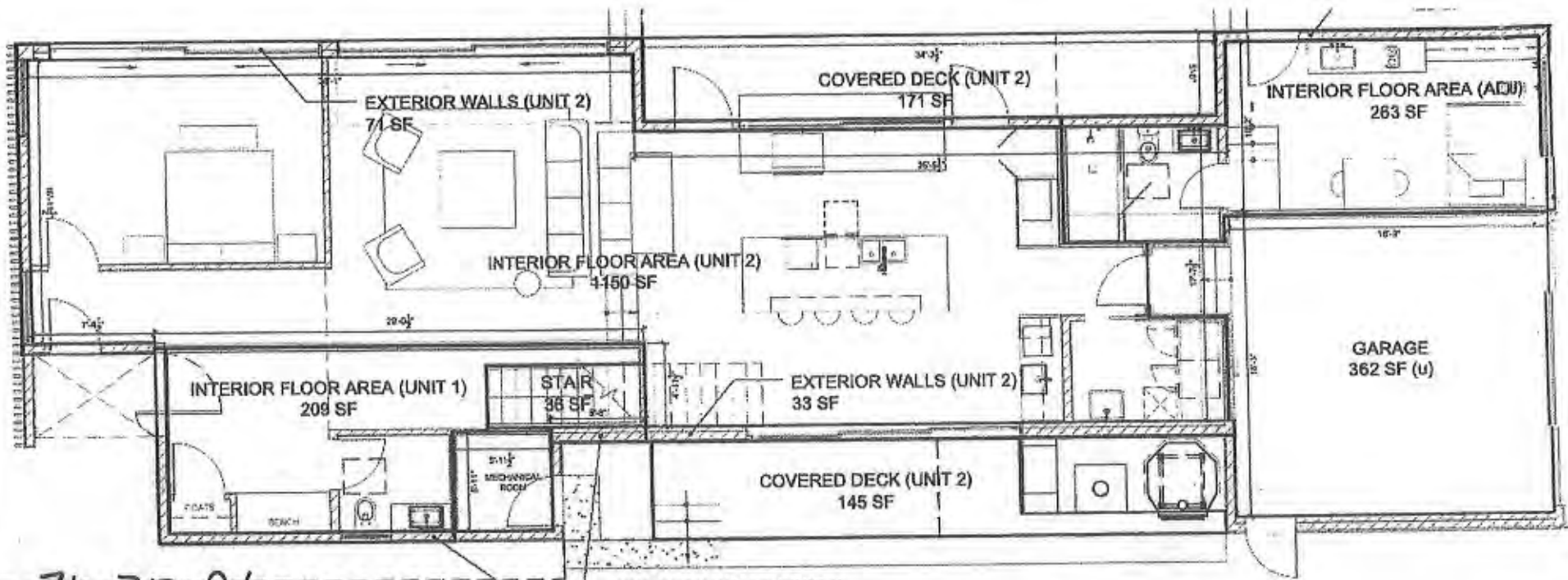
**compounds, as such projects would result in decreased density as well as an adverse cumulative impact on the character of the existing multi-family neighborhood.**

**Please continue this hearing and require further study of this project by Commission staff.** We hope that you will require a new set of plans that reflect both the intent and feasibility of maintaining the existing density of the properties and protection of the multi-family character of the neighborhood.

Sincerely,

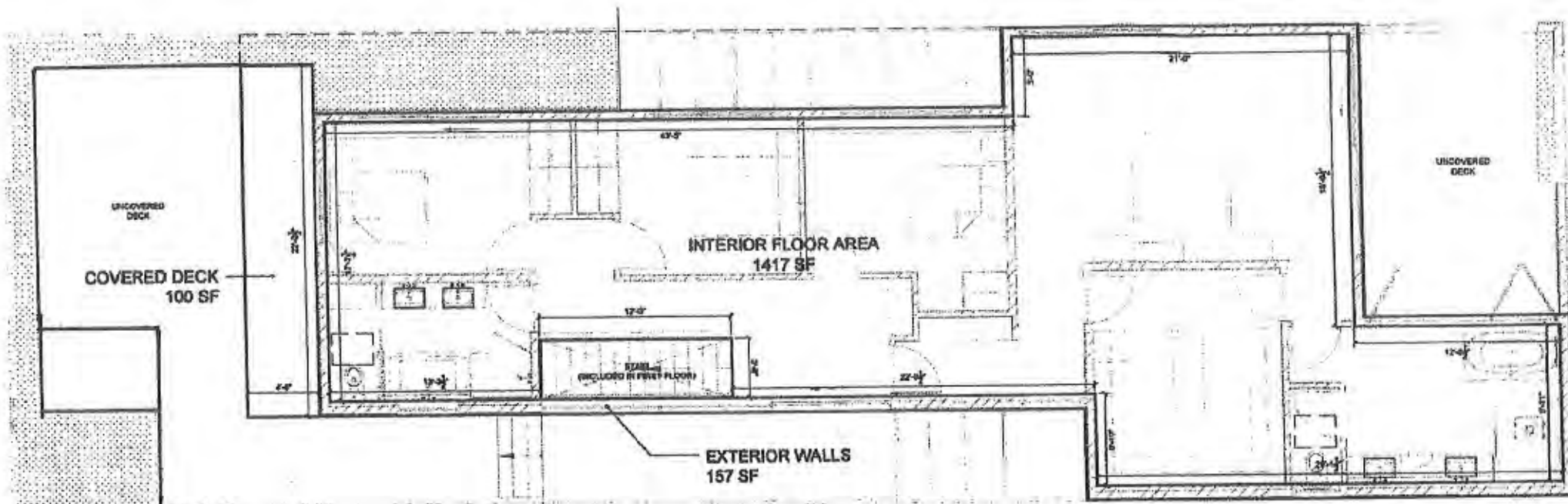
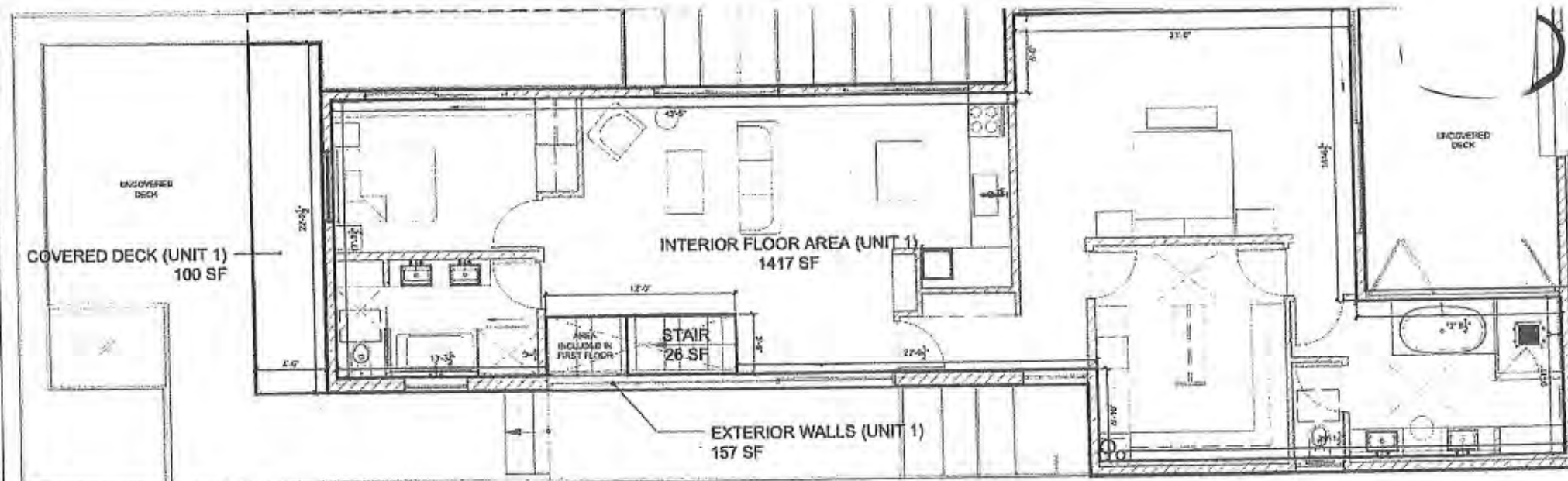
 Citizens Preserving Venice

EXHIBITS



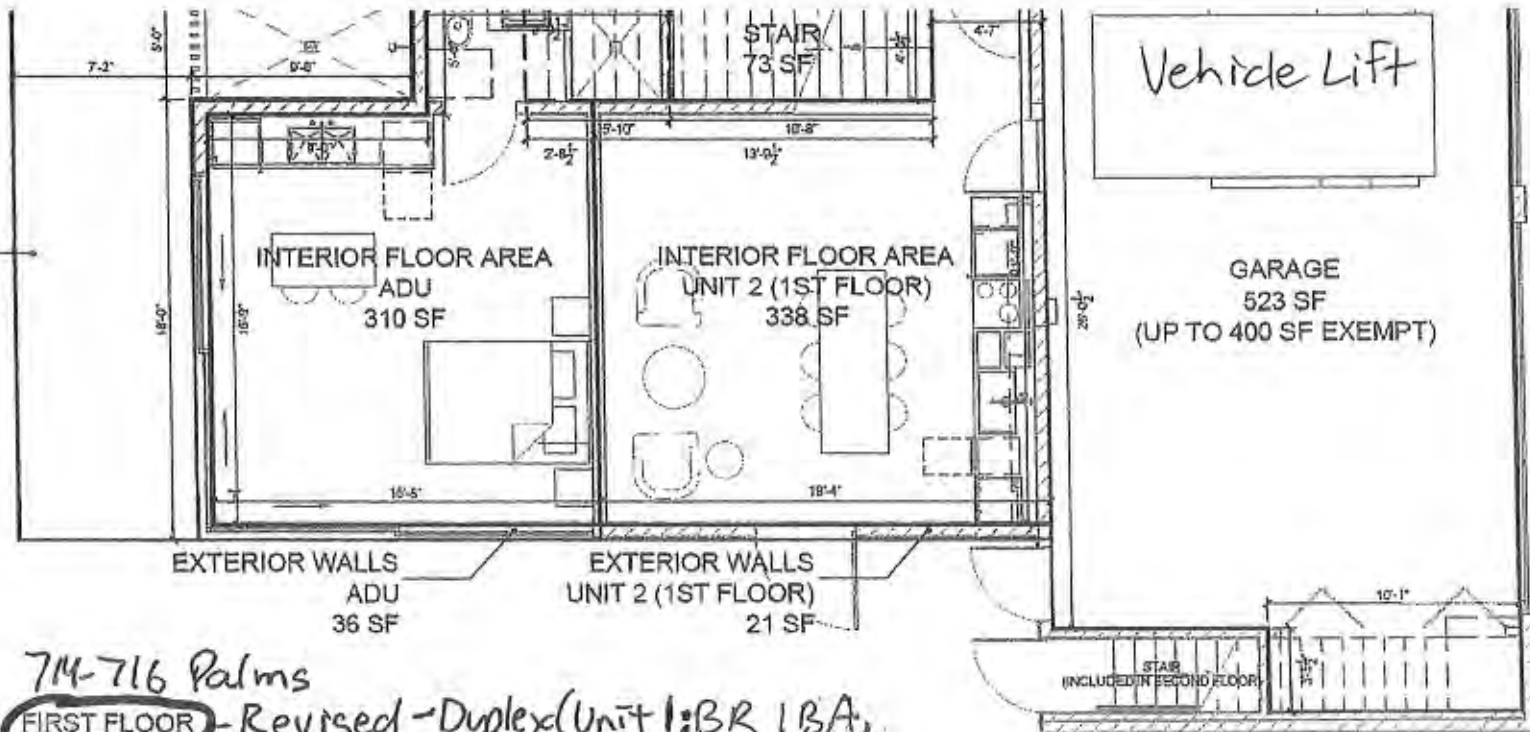
712  
 (A)





2/2

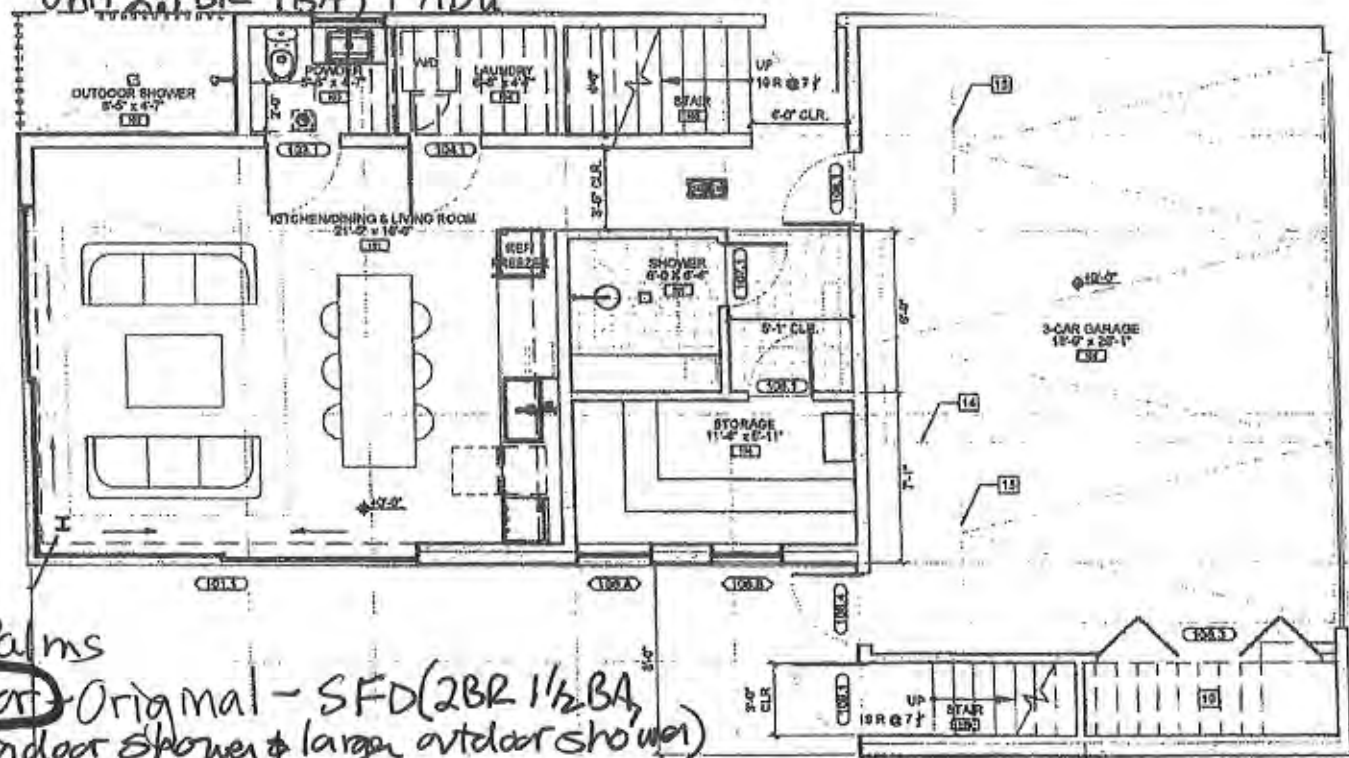
COVERED DECK  
210 SF



714-716 Palms

FIRST FLOOR

Revised - Duplex (Unit 1: BR 1 BA,  
Unit 2: 1 BR 1 BA) + ADU



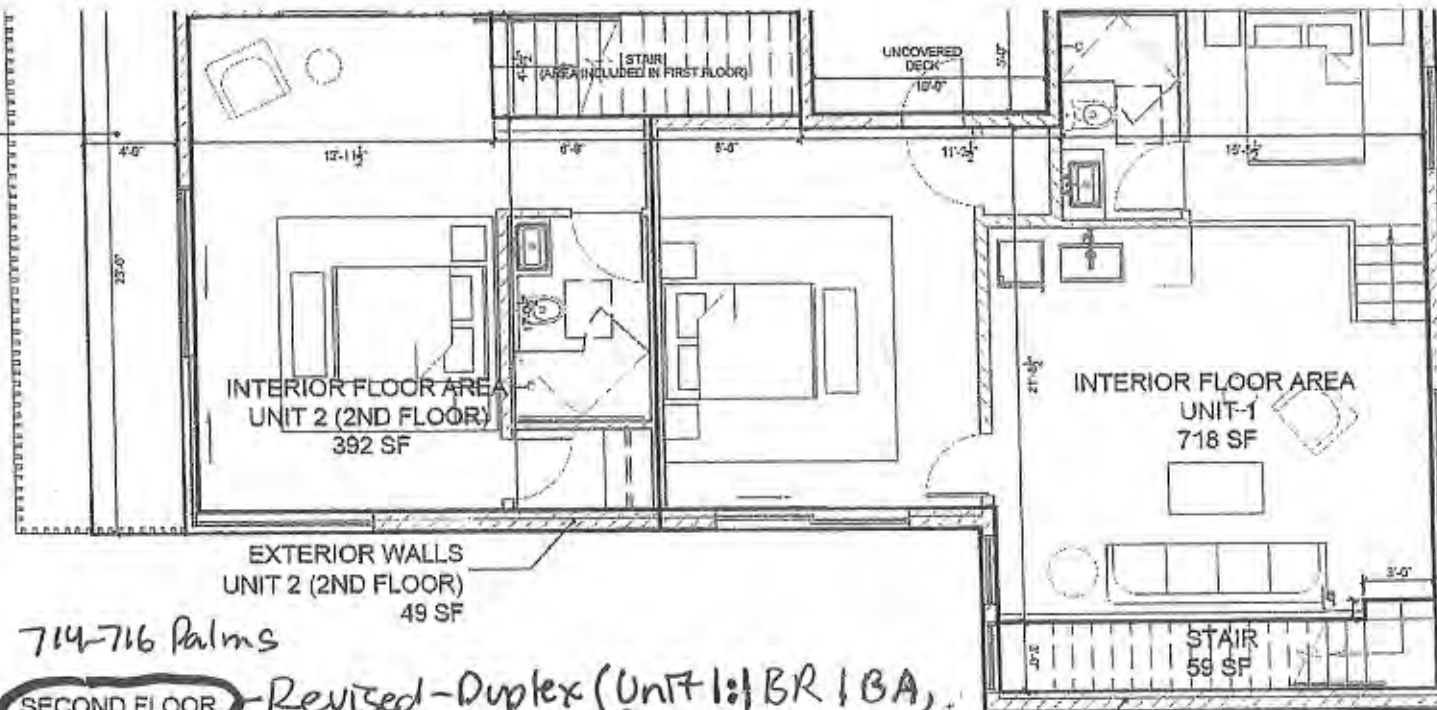
714-716 Palms

First Floor

Original - SFD (2BR 1 1/2 BA,  
+ large indoor shower & large outdoor shower)

(B) 1/2

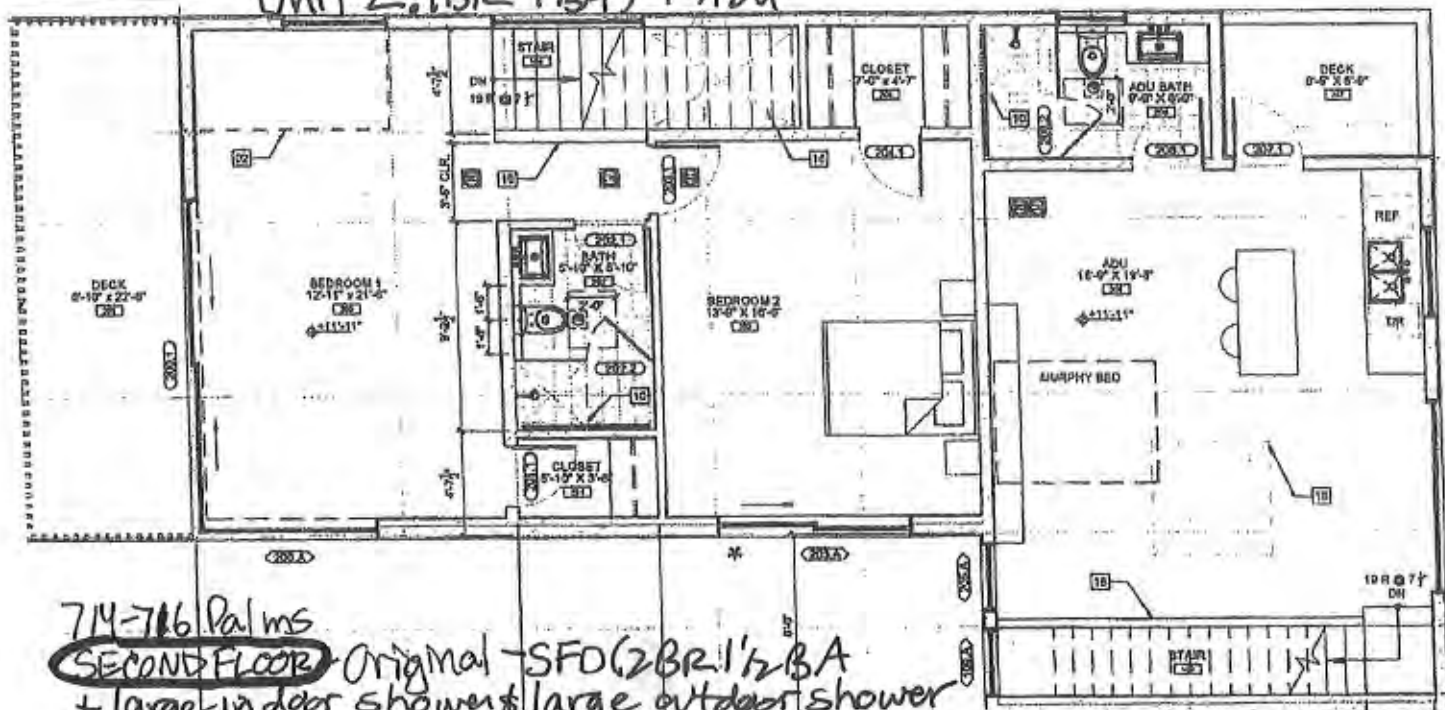
COVERED DECK  
92 SF



714-716 Palms

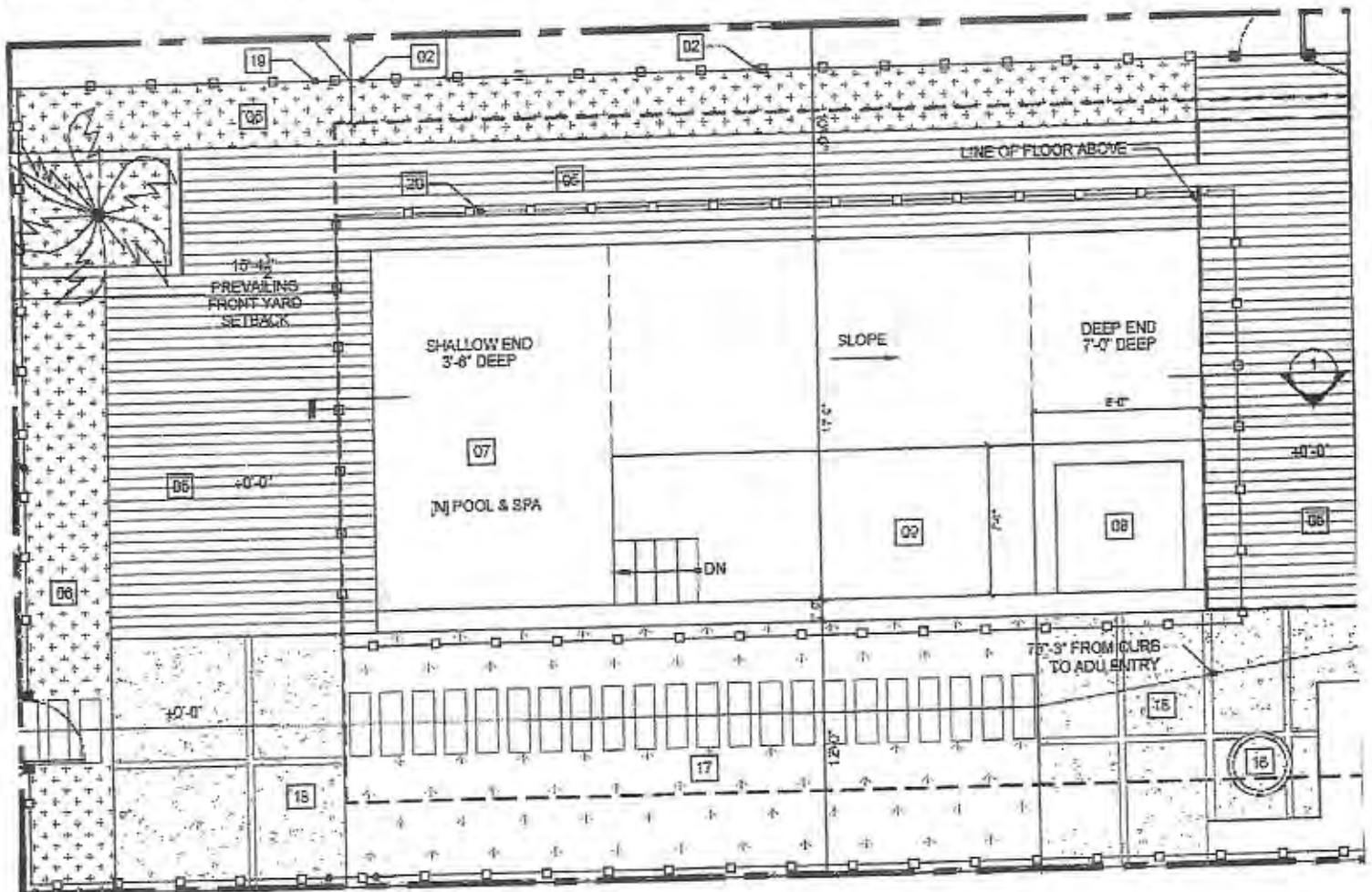
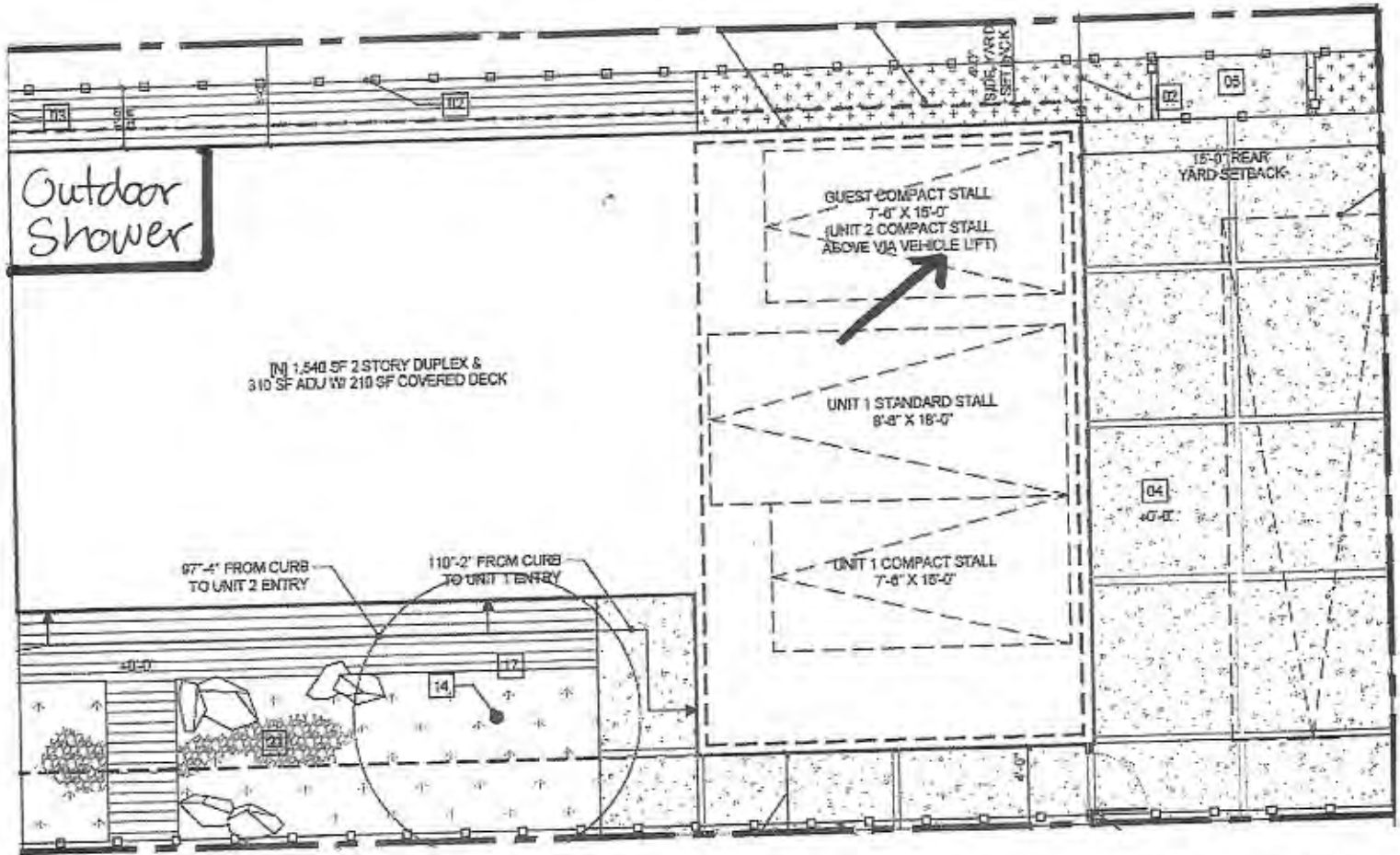
SECOND FLOOR

Revised - Duplex (Unit 1: 1 BR 1 BA,  
Unit 2: 1 BR 1 BA) + ADU



# 714-716 Palms plot plan

(C)





## 710-712 PALMS

- \* The duplex contains one 1-bedroom unit and one 2-bedroom unit, same as existing.
- \* Overall bedrooms decrease from 4 in original City-approved plans to 3 in revised plans.
- \* The square footage of the living area increases from the existing 1,430 square feet to 3,039 square feet.

### Unit 1

- \* This is the only unit between both 710-712 and 714-716 Palms that has two bedrooms.
- \* The main entry into the unit faces the bedroom door.
- \* The master bedroom walk-in closet is bigger than the second bedroom.
- \* The smaller bedroom is approximately the same size as the adjacent bathroom and much smaller than the master bathroom.
- \* The uncovered deck off of the master bedroom has full height walls (but no ceiling on plans) with window type openings, which could easily be enclosed by adding a roof and windows.
- \* The size of the large uncovered decks is approximately  $\frac{1}{3}$  the size of the living spaces.
- \* There appears to be no eating area.
- \* The second story decks are not set back an additional 3 feet from the minimum required side yard as required by code.

### Unit 2

- \* Unit 2 is on the ground floor.
- \* The main entry into the unit faces the bedroom door.
- \* No dining area, only a bar/barstools.
- \* No bathroom, this is not a unit.
- \* Two covered decks.

### Parking

- \* The Unit 1 standard stall is partially blocked by Unit 2 compact stall.
- \* It appears that the car in the garage for Unit 1 cannot get out without moving both outer tandem parking spaces for both Units and 1 and 2.
- \* Tandem spaces for both units make more it likely that street parking will be used rather than block the inner cars.

### ADU

- \* ADU living area is only 201 square feet plus a 72 square foot bathroom.



## 714-716 PALMS

- \* The existing duplex contains two 2-bedroom units (4 bedrooms) and the proposed duplex contains two 1-bedroom units, a decrease of 2 bedrooms.
- \* The total square footage per the new plans is 1,758 square feet vs. the existing structure of 1,968 square feet, a reduction of 210 square feet.
- \* The total new square footage of 1,758 for this lot compares to 3,039 square feet for the project at 710-712 Palms.
- \* The living space for the project at 714-716 Palms is 1,281 square feet less than for the adjacent project at 710-712 Palms, or 42% less.

### Unit 1

- \* To reach the bathroom from the one bedroom, you must walk through the kitchen and living room as well as through the loft sleeping area.
- \* There is no stove or dining area.
- \* The loft sleeping area is not a bedroom as there is no door, it's open to the kitchen and living area below, and there's no closet.

### Parking

- \* Car using parking lift—when need to use the car it requires both the car under the lift and the car behind the lift to be moved.
- \* This parking scheme is unlikely to be used and the residents will likely park on the street. This is "double tandem parking," which has not been allowed in the Coastal Zone.
- \* The door leading in or out of Unit 2 opens on the garage space for Unit 1.
- \* The Unit 2 parking in the uncovered area blocks both Unit 1 parking spaces.

### Yard

- \* The size of the pool and spa is 962 square feet.
- \* The yard takes up over half of the lot area, approximately 2,700 square feet including the large outdoor shower that is included on the footprint of the duplex

### ADU

- \* The ADU is only 250 square feet plus a 60 square foot bathroom
- \* The ADU has dishwasher, 2-basin sink and fridge but no stove
- \* The ADU's front door is either of two large sliding doors on 2 of the 3 walls, leaving almost no wall space.
- \* This ADU is designed to open up to the large yard and pool/spa area.