

**CALIFORNIA COASTAL COMMISSION**

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# Th14b

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Staff Report: 01/21/2020  
Hearing Date: 02/11/2020

## STAFF REPORT: DE NOVO HEARING

**Appeal Number:** A-5-VEN-20-0037

**Applicant:** Eli and Stephanie Holzman, Holzman Living Trust

**Agent:** Chris Parker, Pacific Crest Consultants

**Project Location:** 710 E. Palms Blvd., Venice, City of Los Angeles, Los Angeles County (APN: 4241-015-021)

**Project Description:** Demolition of a one-story, 1,445 sq. ft. duplex and detached two-car garage, and construction of a two-story, 28-ft. tall, 3,192 sq. ft. duplex with an attached two-car garage, plus three additional on-site parking spaces, and an attached 263 sq. ft. junior accessory dwelling unit on a 5,299 sq. ft. lot.

**Staff Recommendation:** Approval with Conditions.

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## SUMMARY OF STAFF RECOMMENDATION

The subject site is in a residential neighborhood in the Milwood subarea of Venice. On June 22, 2020, the City of Los Angeles Director of Planning approved a coastal development permit (DIR-2018-7237-CDP-MEL) for the demolition of an existing duplex with a detached two-car garage and construction of a new two-story, 28-ft. high, 2,850 sq. ft. single-family residence with an attached 191 sq. ft. junior accessory dwelling unit (JADU) and four on-site parking spaces. The local permit was appealed to the Coastal Commission on August 7, 2020. On November 8, 2020, the Commission determined that a substantial issue existed with respect to the grounds on which Appeal No. A-5-VEN-20-0037 was filed: primarily, that the project as approved by the City was inconsistent with the unique multi-family character of the area and contributed to an adverse trend in loss of housing density. The applicant subsequently revised the project to address these concerns

A-5-VEN-20-0037 (Holzman)  
De Novo and Dual Permit

and now proposes the demolition of the existing one-story, 1,445 sq. ft. duplex and detached two-car garage, and construction of a new two-story, 28-ft. tall, 3,192 sq. ft. duplex with an attached 263 sq. ft. JADU and five on-site parking spaces.

The project site is located within the City of Los Angeles Single Permit Jurisdiction Area. The Commission certified the Venice Land Use Plan (LUP) in 2000, which was adopted by the City in 2001. However, the City does not yet have a certified Local Coastal Program (LCP). Therefore, the Chapter 3 policies of the Coastal Act constitute the standard of review for the project, with the certified LUP used as guidance.

The proposed new duplex will preserve the existing housing density on-site and provide more affordable housing opportunities (as compared to a single-family residence) in a coastal area impacted by rising housing costs and housing shortages. The project may also set a positive precedent of maintaining, and/or increasing, the number of dwelling units on already-developed lots in residential neighborhoods. The proposed duplex has been designed for conformance with the density, height, setbacks, mass, and scale of the surrounding community as well as the applicable certified LUP policies. The proposed on-site parking and development setbacks will preserve public access to the surrounding area, while design features such as waterproofing and maintenance of permeable area on-site will minimize risks to life and property in a hazardous area and maintain nearby water quality.

Therefore, staff recommends **approval** of the de novo coastal development permit (CDP) A-5-VEN-20-0037 with eight (8) special conditions: 1) Permit Compliance; 2) Los Angeles Department of Building and Safety Approval, 3) Local Government Approval; 4) Final Parking Plan; 5) Construction Best Management Practices, 6) Landscaping, 7) Assumption of Risk, and 8) Deed Restriction. These conditions will ensure the JADU and vehicle parking spaces are developed and maintained on-site, biological resources and water quality are protected for the life of the project, and risks to life and property from flood hazards are minimized.

The proposed project, only as conditioned, can be found consistent with Chapter 3 of the Coastal Act.

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**EXHIBITS**

- [Exhibit 1 – Project Location](#)
- [Exhibit 2 – Survey Area Map](#)
- [Exhibit 3 – Revised Project Plans](#)

## **I. MOTION AND RESOLUTION – DE NOVO PERMIT**

**Motion:** I move that the Commission **approve** Coastal Development Permit Application No. A-5-VEN-20-0037 pursuant to the staff recommendation.

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

**Resolution:** The Commission hereby approves Coastal Development Permit Application No. A-5-VEN-20-0037 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that will substantially lessen any significant adverse impacts of the development on the environment.

## **II. MOTION AND RESOLUTION – DUAL PERMIT**

**Motion:** I move that the Commission **approve** Coastal Development Permit Application No. A-5-VEN-20-0037 pursuant to the staff recommendation.

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

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

## **III. STANDARD CONDITIONS**

This permit is granted subject to the following standard conditions:

- 1. Notice of Receipt and Acknowledgment.** The permit is not valid and development

shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

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

#### IV. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Permit Compliance.** The permittee shall undertake and maintain the development in conformance with the special conditions of the permit and the final plans, including but not limited to duplex, the junior accessory dwelling unit (JADU), and the on-site parking plans. Any proposed changes to the approved plans shall be reported to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations. No changes to the approved plans shall occur without a Commission-approved permit amendment unless the Executive Director determines that no permit amendment is required.
2. **City of Los Angeles, Department of Building and Safety Approval.** PRIOR TO ISSUANCE OF COASTAL DEVELOPMENT PERMIT, the applicant shall provide to the Executive Director evidence, acceptable to the Executive Director, of preliminary approval by the City of Los Angeles, Department of Building and Safety (LADBS). The applicant shall inform the Executive Director of any changes to the project required by LADBS. Such changes shall not be incorporated into the project until the applicant obtains an amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.
3. **Local Government Approval.** The proposed development is subject to the review and approval of the City of Los Angeles (City). This action has no effect on conditions imposed by the City pursuant to an authority other than the Coastal Act. In the event of conflict between the terms and conditions imposed by the City and those of this coastal development permit, the terms and conditions of Coastal Development Permit A-5-VEN-20-0037 shall prevail.

**4. Final Parking Plan.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit a Final Parking Plan, approved by the City of Los Angeles Department of Building and Safety, for review and approval by the Executive Director. The Final Parking Plan shall be in substantial conformance with the parking plan submitted to the Commission's South Coast District Office on January 19, 2021 and shall provide a minimum of five (5) parking spaces to be maintained on-site.

**5. Water Quality.**

A. Construction Responsibilities and Debris Removal

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

- 10) The discharge of any hazardous materials into any receiving waters shall be prohibited;
- 11) Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible;
- 12) Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity;
- 13) All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

#### B. Drainage and Water Quality

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

**6. Landscaping: Drought-Tolerant, Non-Invasive Plants.** Vegetated landscaped areas shall consist of native plants or non-native drought tolerant plants, which are non-invasive. No plant species listed as problematic and/or invasive by the California Native Plant Society (<http://www.CNPS.org/>), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (<http://www.cal-ipc.org/>), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a "noxious weed" by the State of California or the U.S. Federal Government shall be utilized within the property. All plants shall be low water use plants as identified by California Department of Water Resources (See: <http://www.water.ca.gov/wateruseefficiency/docs/wucols00.pdf>).

- 7. Assumption of Risk, Waiver of Liability and Indemnity.** By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards, including but not limited to waves, storms, flooding, erosion, and earth movement, many of which will worsen with future sea level rise; (ii) to assume the risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.
- 8. Deed Restriction.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the landowner has executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

## **VI. FINDINGS AND DECLARATIONS**

### **A. PROJECT DESCRIPTION AND LOCATION**

The project site is located approximately  $\frac{3}{4}$  mile inland from the public beach and fronts E. Palms Boulevard, with access to the rear-yard obtained through the abutting alley, Rialto Court ([Exhibit 1](#)). The subject lot, similar in size to most lots within the surrounding neighborhood, is approximately 5,299 sq. ft. in area (40-ft. wide by 132-ft. long) and designated Multi-Family Residential – Low Medium I by the certified LUP. Additionally, the lot is zoned R2-1 by the City of Los Angeles uncertified Zoning Code. The overall Milwood subarea and the subject block are characterized primarily by one-story, two-story, and three-story single-family and multi-family homes of varying sizes and architectural styles.

The subject site is currently developed with a one-story, 1,445 sq. ft. multi-family residence with two units (640 sq. ft. and 800 sq. ft. in area) and a detached, 445 sq. ft. two-car garage ([Exhibit 3](#)). The existing duplex was built in 1970 and is considered legally non-conforming regarding the two on-site parking spaces, as certified Venice LUP Policy II.A.3 requires a



total of five parking spaces for duplexes on lots at least 40-ft. wide (specifically, two parking spaces per unit in addition to one guest space).

In June 2020, the City approved a local CDP (DIR-2018-7237-CDP-MEL) for demolition of the existing building and construction of a new two-story, 28-ft. high, 2,850 sq. ft. single-family residence with an attached 342 sq. ft. two-car garage, plus two additional uncovered on-site parking spaces, and an attached 191 sq. ft. JADU. The City's approval was appealed to the Coastal Commission on August 7, 2020. On November 8, 2020, the Commission determined that a substantial issue existed with respect to the grounds on which Appeal No. A-5-VEN-20-0037 was filed because the approved project was inconsistent with the unique multi-family character of the area and prejudiced the City's ability to prepare a certified LCP consistent with the Coastal Act. After working with Commission staff to address these concerns, the applicant revised the project to maintain the existing number of units on-site in addition to a new JADU.

The project now proposes demolition of the existing duplex and construction of a new two-story, 28-ft. high, 3,192 sq. ft. duplex with a 263 sq. ft. JADU located on the first floor ([Exhibit 3](#)). The JADU will include one bedroom, one bathroom, a kitchen, and a side-yard entrance separate from those of the other residential units. The JADU will also have a window in the form of an approximately 112 sq. ft. glass door. The first unit, approximately 1,417 sq. ft. in area, is accessed from the first floor and extends throughout the entire second floor. This unit includes two uncovered, permeable decks within the front-yard and rear-yard (328 sq. ft. and 259 sq. ft., respectively). The second unit, approximately 1,150 sq. ft. in area, is located on the first floor and includes two covered decks within the north and south-facing side-yards (171 sq. ft. and 145 sq. ft., respectively). No rooftop deck or roof access structure is proposed for the residence. The duplex will include an attached 342 sq. ft. two-car garage in the rear-yard, plus three compact spaces immediately behind the garage, accessed from the abutting alley (Rialto Court). The development will retain 15-ft. setbacks in the front and rear-yards and 4-ft. setbacks in the side-yards.

## **B. DEVELOPMENT**

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

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

Section 30251 of the Coastal Act states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual

quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

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

New development shall...

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

Venice Certified LUP Subsection “Duplex/Multi-Family Residential” states:

It is the intent of Venice LUP to maintain existing stable multi-family residential neighborhoods. In those stable neighborhoods characterized by a mix of densities and dwelling types, permitted densities may be reduced to levels consistent with the character of the entire area in order to minimize impacts on infrastructure, services, and to maintain or enhance the residents’ quality of life. The loss of potential units in these locations can be offset by the provision of new housing opportunities via bonuses for the replacement of affordable housing and in mixed-use development.

Venice Certified LUP Policy I.A.2 Preserve Stable Single-Family Neighborhoods, states:

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

Venice Certified LUP Policy I.A.5 Preserve and Protect Stable Multi-Family Neighborhoods, states:

Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents’ quality of life can be maintained and improved.

Venice Certified LUP Policy I.A.6 Multi-Family Residential– Low Medium I Density, states, in relevant part:

Accommodate the development of duplexes and multi-family dwelling units in the areas designated as “Multiple Family Residential” and “Low Medium I” on the Venice Coastal Land Use Plan (Exhibits 9 through 12). Such development shall comply with the density and development standards set forth in this LUP...

Southeast Venice & Milwood

Use: Two units per lot, duplexes and multi-family structures

Density: One unit per 2,500 square feet of lot area. Lots smaller than 5,000 square feet are limited to a maximum density of two units per lot.

Replacement Units/Bonus Density: Lots greater than 5,000 square feet can add extra density at the rate of one unit for each 2,000 square feet in excess of 5,000 square feet in lot area if the unit is a replacement affordable unit reserved for low and very low income persons. (See LUP Policies I.A.9 through I.A.16).

Yards: Yards shall be required in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.

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

Venice Certified LUP Policy I.A.7 Multi-Family Residential - Low Medium II Density, states in relevant part:

Accommodate the development of multi-family dwelling units in the areas designated as "Multiple Family Residential" and "Low Medium II Density" on the Venice Coastal Land Use Plan (Exhibits 9 through 12). Such development shall comply with the density and development standards set forth in this LUP...

Venice Certified LUP Policy I.A.8 Multi-Family Residential – Medium Density, states in relevant part:

Accommodate the development of multi-family dwelling units in the areas designated as "Multiple Family Residential" and "Medium Density" on the Venice Coastal Land Use Plan (Exhibits 9 through 12). Such development shall comply with the density and development standards set forth in this LUP.

Venice Certified LUP Policy I.E.1 General, states:

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

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

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

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

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

### **Residential Density**

Coastal Act Section 30250(a) requires new residential development be located near existing developed areas able to accommodate it and where it will not have significant, cumulative adverse impacts to coastal resources. Section 30253 of the Coastal Act requires new development be compatible with the character of the neighborhood, minimize risks to life and property in high flood hazard areas, and minimize vehicle miles traveled. Together, these policies encourage the concentration of development in existing developed areas (i.e. infill) that will minimize impacts to coastal resources. In addition, the certified LUP incorporates these Coastal Act policies and designates specific areas in Venice where more dense development should be accommodated (Policy I.A.5) and specific areas where only single-family residential neighborhoods are allowed (Policy I.A.2). Thus, the LUP reflects the City's intent to designate areas where more concentrated development should exist in Venice.

The Venice LUP designates the project site and adjacent rows of lots as Multi-Family Residential—Low Medium I Density per the Policy I.A.7 subarea map. This designation allows for the construction of a multi-family structure with one dwelling unit per 2,500 sq. ft. of lot area. With an area of 5,299 sq. ft., the subject lot is limited to a maximum density of two dwelling units. Despite this limitation, the additional JADU is consistent with Chapter 3 of the Coastal Act because under the State ADU law, ADUs are accessory uses that do not count toward the density limit on-site (Govt. Code § 65852.2(a)(8)). Although the State ADU law is not the standard of review and does not supersede or modify Chapter 3 of the Coastal Act, the Commission has discretion to review ADUs in the same manner as the State ADU law for purposes of assessing compliance with LUP density limits. Furthermore, Section 30604 of the Coastal Act encourages the protection of housing opportunities in the coastal zone for persons of low and moderate income; encouraging development of ADUs is consistent with this direction in the Coastal Act.

The project site is currently developed with two dwelling units. The proposed project will replace the existing duplex with two units that are proportional to one another in size (1,150 sq. ft. and 1,417 sq. ft.). The project also includes a 263 sq. ft. attached JADU with a separate entrance and amenities, thus providing a third housing opportunity on-site while complying with the limitations of LUP policies I.A.6 and I.A.7. To further ensure the maintenance of housing density, **Special Condition 1** requires the development to be carried out in a manner consistent with the proposed duplex and JADU and **Special Condition 8** requires the applicant to record a deed restriction imposing the special conditions of the permit as restrictions for use of the property.

As proposed and conditioned, the development concentrates new development in an already developed area, maintains the existing housing density on-site, and conforms with Section 30250(a) of the Coastal Act.

### **Community Character, Mass & Scale**

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

The Milwood subarea contains coastal resources, such as walks, streets, and historic structures, which are integral to the unique character of Venice. All residential portions of Milwood are designated Multi-Family Residential – Low Medium I and Low Medium II Density; thus, duplexes and other multi-unit residential development are a significant component of the character of the subject neighborhood. While the Venice LUP is not the standard of review for this appeal, certified LUP policies provide guidance from which the Commission can evaluate a project's consistency with community character policies of the Coastal Act.

Policy I.A.7 of the LUP does not specify the required yard setbacks for residential development in Milwood; however, most of the homes surrounding the subject site have provided front, rear, and side-yard setbacks in order to maintain permeable yard area as mandated by the Venice LUP. The proposed development includes 15-ft. front and rear-yard setbacks, as well as 4-ft. side-yard setbacks, that will be compatible with the surrounding residence setbacks. Regarding height, Policy I.A.6 limits buildings with a varied roofline to a maximum 30-ft. height, with any portion of the development exceeding 25-ft. set back from the front-yard by one foot for every one foot of additional height. The new duplex will include a sloped roof, with the 28-ft. tall portion of the structure set back approximately 18.5 ft. from the front-yard consistent with the Policy I.A.6 height requirements. This height is less than the maximum allowed by the LUP and will not dwarf the surrounding residences. Overall, the proposed design includes setbacks and a building height which will maintain an open and visible access corridor for enhancement of visual quality, adhere to the LUP provisions, and maintain community character.

The findings for the Commission's substantial issue hearing of Appeal No. A-5-VEN-20-0037 included a survey conducted by Commission staff. In September 2020, Commission staff used the City of Los Angeles Zone Information and Map Access System (ZIMAS) and records of past Commission and City actions to consider the area, year of construction or redevelopment, and housing density of all single- and multi-family residences within the subject neighborhood ([Appendix B](#)). This survey included all residences within the 700 block of E Palms Boulevard (extending between Shell Avenue and Oakwood Avenue) and

totaled 35 homes<sup>1</sup>. The average habitable area for all 35 homes in this survey was approximately 2,256 sq. ft.<sup>2</sup>. Of the 25 original homes shown in Table 3, 63% are multi-family dwellings. This percentage decreased to 51% multi-family dwellings when including all recent City and Commission action in the surrounding area, which will be discussed further below in the discussion of cumulative effects.

Tables 1 and 2 summarize recent Commission and City action in the survey area since the Venice LUP certification in 2001, while Table 3 summarizes all original residences in the survey area which have not been redeveloped since Venice LUP certification in 2001. These survey results provide information on the current community character of the subject neighborhood, as well as the community character prior to recent redevelopment projects in the neighborhood. Regarding mass and scale, tables 1-3 show that the proposed total habitable area of the duplex (3,455 sq. ft.) will exceed the average area for both original homes and recently-approved homes; however, the size difference is not substantial. Furthermore, the proposed residence is smaller in size than two recently constructed homes shown in Table 2 and comparable in size to two original homes shown in Table 3. Overall, the proposed duplex is unlikely to produce a measurable impact on the community character, mass or scale of development in this neighborhood. As such, the project is consistent with the multi-family character of the surrounding neighborhood. The project will maintain the existing density on-site and thus will not adversely impact the community character in regard to density.

Overall, the project has been designed for consistency with the residential density, scale, setbacks, and architecture of the surrounding neighborhood. The proposed multi-unit structure will comply with the density and design provisions of LUP policies I.A.5 through I.A.8, as well as policies I.E.1 through I.E.3, and the proposed project is visually compatible with the character of the surrounding development. To ensure that the new multi-family residence maintains the community character of the area, **Special Condition 1** requires the development to be carried out in a manner consistent with the proposed plans, including the construction of the proposed duplex and JADU. **Special Condition 6** is imposed to ensure that all landscaping and vegetation on-site shall consist solely of native plants, or non-native drought tolerant plants which are non-invasive. The development, as proposed and conditioned, will be compatible with the character and scale of the surrounding area and will minimize impacts to visual resources and community character.

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<sup>1</sup> The scope of a community character survey depends to some extent on the specific neighborhood involved, and there is no one size fits all approach. Commission staff have recently conducted a similar community character survey for Appeal No. A-5-VEN-17-0016, which encompassed a greater residential area and included 84 residences. Staff also conducted a community character for CDP No. 5-19-1167, which encompassed a lesser area than the subject survey and included 17 residences. In this case, the number and distribution of residences in the 700 block of E Palms Blvd. allows the designated survey size to yield a sufficient amount of information in order to analyze community character and the cumulative effects of the City-approved project.

<sup>2</sup> The average habitable area for the 35 total surveyed homes includes the habitable area of the duplexes currently existing at 710 E Palms Blvd. and 714-716 E Palms Blvd.

### **Cumulative Effect**

In order to evaluate the potential cumulative impacts of the City-approved residence, the incremental effects of the proposed development on community character, mass, and scale are considered in connection with the effects of the past, current, and probable future projects within the subject area. To that end, Commission staff reviewed all residential development on the subject 700 block of E Palms Boulevard (extending between Shell Avenue and Oakwood Avenue) since 2001 ([Appendix B](#)). This survey included 17 single-family residences and 18 multi-family residences, and considered the year of Commission or City approval for redevelopment, number of units, lot size, habitable residence area, and height. For properties which have not received Commission or City approval for redevelopment since 2001, the survey considered the year of residence construction, number of units, lot size, and current habitable residence area. Height is not included on the mapping tool used to obtain this information, ZIMAS, and thus wasn't included for the properties that have not redeveloped after 2001.

Table 1 summarizes recent Commission action in the subject area since the Venice LUP certification in 2001 and includes metrics related to the compatibility of a proposed project with the community character of a given area. Table 2 summarizes recent local approvals in the subject area issued by the City of Los Angeles since the Venice LUP certification in 2001 which were not appealed to the Commission. This table includes the same metrics as Table 1 and shows a net reduction in housing density. Lastly, Table 3 summarizes the year built, number of units, lot size, and residence size of all residences within the subject area which were built prior to certification of the LUP, using information obtained from ZIMAS on September 12, 2020. This table does not include development height or the original area of redeveloped properties, as ZIMAS does not provide this information.

The information analyzed by Commission staff shows the adverse cumulative effect that recent City actions have had on the subject neighborhood—specifically, the net loss of housing units and change to the unique multi-family community character. Of the 25 original structures shown in Table 3, 63% are multi-family dwellings. This percentage decreases to 51% multi-family dwellings when including all recent City and Commission action in the surrounding area. Overall, Table 2 shows a pattern of locally-approved projects that reduced housing density in the Milwood subarea, manifesting in the construction of single-family residences on lots able to accommodate multiple units.

Thus, past locally-approved projects in the subject appear to be slowly changing the community character of the surrounding area from mostly multi-family to increasingly single-family. The current project will not continue this trend because it will replace the existing multi-family structure on-site with a commensurate type of development and number of units. The project may also set a positive precedent of maintaining, and/or increasing, the number of dwelling units on already-developed lots in residential neighborhoods.

Regarding the potential cumulative effects of future projects, a similar de novo CDP will be considered by the Commission for the adjacent lot at 714-716 E Palms Boulevard; this project also proposes demolition of an existing duplex and construction of a new duplex

and attached JADU<sup>3</sup>. This suggests that the current project may set a meaningful precedent for future development in the area and encourage continued preservation of housing in a residential neighborhood of Venice designated for multi-family use by the certified LUP.

The project must also be considered for potential cumulative effect on the mass and scale of the Milwood neighborhood. The survey results show that past Commission and local actions in the subject neighborhood do not appear to have had a cumulative effect on mass and scale of development in the Milwood subarea. While redeveloped homes in the subject neighborhood seem to be larger in size than most original homes, the average size of original homes in the neighborhood (2,095 sq. ft.) has not been significantly impacted by recent projects, as the current average size for all surveyed homes is approximately 2,256 sq. ft.<sup>4</sup>. The proposed duplex includes a size, height, and design that is consistent with the LUP development policies discussed above. Overall, the project will not result in significant adverse cumulative effects to mass and scale of residential development in the surrounding area, or to the community character of the neighborhood.

Therefore, the Commission finds that the development, as conditioned, conforms to the applicable policies of the certified Venice LUP, as well as Sections 30250, 30251, and 30253 of the Coastal Act.

## **C. HAZARDS**

Coastal Act Section 30253 states, in relevant part:

New development shall do all of the following:

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

Section 30253 of the Coastal Act requires siting new development such that it minimizes risks to life and property in flood hazard areas, assures stability and structural integrity, and does not require the construction of protective devices that substantially alter natural landforms. On November 7, 2018, the Commission adopted a science update to its Sea Level Rise Policy Guidance. This interpretive guidance helps ensure that projects are designed and built in a way that minimizes risks to development associated with sea level rise (SLR) and avoids related impacts to coastal resources. These guidelines state that “to

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<sup>3</sup> The Commission found substantial issue on this project (Ref: Appeal No. A-5-VEN-20- 0039). The de novo project proposes to retain existing housing density and is scheduled for the same Coastal Commission hearing on February 11, 2021.

<sup>4</sup> The average habitable area for the 35 total surveyed homes includes the habitable area of the duplexes currently existing at 710 E Palms Blvd. and 714-716 E Palms Blvd.



comply with Coastal Act Section 30253 or the equivalent LCP section, projects will need to be planned, located, designed, and engineered for the changing water levels and associated impacts that might occur over the life of the development.” The guidelines also include a step-by-step approach for addressing SLR in project design for CDPs.

The first step in reviewing the project for minimization of risk is to establish the projected SLR range for the subject site. Using the methodology recommended by the Ocean Protection Council (OPC) SLR Guidance, the projected SLR ranges for the proposed project are tailored to the nearest National Oceanic and Atmospheric Administration (NOAA) tide gauge, projected lifespan of the project, and risk-aversion scenario. The projected lifespan for residential development is typically 75 years. The selection of a risk-aversion scenario depends on the risk tolerance of different types of development. For example, based on the OPC SLR Guidance, a critical infrastructure asset (such as a hospital) should be analyzed with high risk-aversion and would use a more precautionary range of SLR projections. A parking lot or a bike path, conversely, should be analyzed with lower risk-aversion. In this case, the risk-aversion scenario recommended by both the Commission and OPC Guidance for residential projects is medium-high. The likelihood that SLR will meet or exceed the medium-high risk-aversion scenario is low, and thus represents a precautionary projection that should be used for less adaptive projects, such as a residential structure. The NOAA tide gauge located nearest to Venice is in Santa Monica; for this area, the expected medium-high risk SLR projections for year 2090 and 2100 are 5.3 ft. and 6.7 ft., respectively.

The next step is to determine how physical impacts from SLR may constrain the project site. The site is not located on a beach or coastal bluff, and thus may be analyzed for risk minimization without a coastal erosion analysis. Impacts from flooding and inundation, wave runup, and storm surge can be analyzed using the Coastal Storm Modeling System projections closest to the SLR medium-risk projections listed above. Another source of information is the OPC’s probability table, which estimates the likelihood that SLR will meet or exceed a particular level by a given decade.

According to Coastal Storm Modeling System projections, the subject site will not be inundated with 5.7-ft. of SLR and a 100-year storm. However, with 6.6-ft. of SLR (both with and without a 100-year storm), the entirety of the subject site will be inundated. According to the Venice Sea Level Rise Vulnerability Assessment, prepared for the City in May 2018, this is likely due to the impacts of SLR and storm events on the Venice tide gate system. The tide gates are typically closed prior to high-tide events to prevent the water levels in the canal from rising. As sea levels rise, tide gates may remain closed for longer periods and prevent accumulated stormwater from flushing out to sea. Thus, as storm events become more extreme, flooding may subsequently become more frequent. Thus, the expected inland inundation appears to be attributable to hydraulic connections to the Venice canal system. Since the project lifespan ends in approximately 2096, SLR-related flooding can be anticipated during the lifespan of the development. However, this inundation is projected many decades into the future, toward the end of the anticipated lifespan of the structure. Thus, the area is currently safe and appropriate for development and will likely remain safe for several decades into the future.

To plan for potential SLR related flooding, the applicant has indicated the water level on the subject site that would occur with 6.6-ft. of SLR. The projected 6.6-ft of SLR by 2100 will extend up to 2.63-ft. above the proposed lowest finished floor elevation. The applicant has thus proposed to seal all exterior walls for additional waterproofing up to 2.63-ft. above grade. In addition, the proposed duplex has been designed such that flood gates may be installed at all openings of the first floor.

It is important to note that with expected SLR by 2100, key infrastructure systems across Venice (the road network, electrical station, storm drains, etc.) will be vulnerable to flood damage, rendering these services at risk and endangering the residential areas relying on these services. Given the risks and vulnerabilities the site faces with regard to flood hazards for the life of the development, **Special Condition 7** requires the applicant to assume the risks of pursuing development in a hazardous area and waive any claim of damage or liability against the Commission relating to the Commission's approval of development in this potentially hazardous location.

**Special Condition 1** requires the development to be carried out in a manner consistent with the proposed project, as approved and conditioned. **Special Condition 2** requires the applicant to obtain preliminary review and approval of revised plans by the LADBS in order to address any non-coastal resource related concerns with the revised plans, which may require the applicant to return to the Commission for an amendment to this CDP. **Special Condition 3** requires the applicant to comply with local government requirements, which include details relating to the maintenance of appropriate drainage and permeable area on-site. To ensure that any prospective future owners of the property are made aware of the applicability of the conditions of this permit, **Special Condition 8** requires the applicant to record a deed restriction acknowledging that, pursuant to the subject permit (CDP No. A-5-20-0037), the Coastal Commission has authorized development on the subject property subject to the terms and eight Special Conditions of this permit (imposed as covenants) that restrict the use of the subject property. This condition will additionally provide notice of potential hazards of the property, the risks of flooding, and other sea level rise impacts towards the end of the development's economic life.

Therefore, as conditioned, the Commission finds that the development conforms to the requirements of Section 30253 of the Coastal Act regarding the siting of development in hazardous locations.

## **D. WATER QUALITY**

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

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

The project site is located approximately  $\frac{3}{4}$  mile inland of Venice Beach within an urbanized residential area ([Exhibit 1](#)). However, the proposed development still has the potential to discharge polluted runoff from the project site into coastal waters. To increase on-site percolation of stormwater and reduce runoff, the applicant has proposed design measures including 699 sq. ft. of permeable wood decking, 880 sq. ft. of “softscape” landscaping, and 1,001 sq. ft. of permeable brick paving with sand gaps. These design components will minimize impacts to nearby marine resources in a manner consistent with Sections 30230 and 30231 of the Coast Act.

To preserve water quality during construction, **Special Condition 5** requires the applicant to implement construction Best Management Practices (BMPs). These features include, but are not limited to, the appropriate management of equipment and construction materials, reducing runoff through the use of permeable surfaces, the use of non-invasive drought tolerant vegetation to reduce and treat the runoff discharged from the site, and for the use of post-construction best management practices to minimize any adverse project impacts on coastal waters. To further ensure that water quality is preserved, and energy use is minimized over the life of the development, **Special Condition 6** requires the installation of non-invasive, drought-tolerant vegetation and water-conservative irrigation systems.

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

## **E. PUBLIC ACCESS**

Section 30210 of the Coastal Act states:

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

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

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

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

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

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

The parking requirements outlined in the following table shall apply to all new development...

Residential Uses: Multiple dwelling and duplex on lots 40 feet or more in width, or 35 feet or more in width if adjacent to an alley

Off-Street Parking Required: 2 spaces for each dwelling unit; plus a minimum of 1 (one) guest parking space for each 4 (four) or fewer units (i.e. 2.25 spaces per unit; always round-up to highest whole number of spaces)...

Adequate on-site parking is necessary and provides relief for the general lack of on-street parking that is otherwise utilized by the public to access the coastal zone in Venice. The proposed multi-family residence provides an attached, 362 sq. ft. two-car garage and three compact stalls immediately behind the garage, for a total of five on-site parking spaces accessed through the abutting alley (Rialto Court). This is consistent with the certified LUP parking requirements for duplexes on 40-ft. wide lots, which require two spaces per residential unit and at least one additional guest space per Policy II.A.3. Consistent with state law and Commission precedent, no additional off-street parking is proposed for the proposed JADU, which is accessory in nature and may not result in the same parking demand as a full residential unit. The project does not propose any curb cuts on-site.

To ensure the five off-street parking spaces are maintained, **Special Condition 1** requires the development to be carried out in a manner consistent with the currently proposed parking plans and **Special Condition 4** requires submittal of a final parking plan, approved by LADBS, that provides a minimum of five parking spaces on-site. Regarding public access surrounding the site, the applicant has not proposed any encroachment into the public right-of-way and will maintain adequate 15-ft. setbacks in the front and rear-yards, with 4-ft. setbacks in the side-yards.

The project will not affect the public's ability to gain access to, and/or to make use of, the coast and nearby recreational facilities. Therefore, as conditioned, the development conforms to Sections 30210 and 30214 of the Coastal Act.

## **F. LOCAL COASTAL PROGRAM**

Coastal Act Section 3060 states, in relevant part:

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

The Venice LUP, certified by the Commission in 2000 and adopted in 2001, is advisory in nature, and may provide the Commission with guidance. The proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Land Use Plan for the area. Approval of the project as proposed will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

## **G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

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

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

The proposed project has been conditioned to be consistent with the Chapter 3 policies of the Coastal Act. As conditioned, there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse effect which the development may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative, has no remaining significant environmental effects, either individual or cumulative, and complies with the applicable requirements of the Coastal Act to conform to CEQA.

A-5-VEN-20-0037 (Holzman)  
De Novo and Dual Permit

## **Appendix A – Substantive File Documents**

1. City of Los Angeles certified Venice Land Use Plan.
2. Venice Sea Level Rise Vulnerability Assessment (May 2019, Moffat & Nichol).
3. City of Los Angeles Resolution and staff report for Local CDP No. DIR-2018-7237-CDPMEL.

## Appendix B – Neighborhood Survey Tables

**Table 1.** Past Commission actions on residences within the subject block since certification of the Venice LUP in 2001 ([Exhibit 2](#)).

Address	Action No.	Approval Year	No. of Units	Height (ft.)	Lot Size (sq. ft.)	Square Footage (original)	Square Footage (new)
704 E Palms Blvd	5-05-321-W	2005	1→2	30	5,299	1,320	2,138
730 E Palms Blvd	5-09-026-W	2009	1→1	25	5,300	955	2,735
722-724 E Palms Blvd	5-06-204-W	2006	1→2 (2 detached homes on one lot)	30	5,333	650	2,524
734 E Palms Blvd	5-06-422-W	2006	1→1	25	5,300	936	2,828
758 E Palms Blvd	5-14-0049-W	2014	1→2	25	5,299	1,288	1,288
Average Square Footage (Original/New):						1,030	2,302
Net Loss/Gain in Units:						+3	

**Table 2.** Past City actions on residences within the subject block since certification of the Venice LUP in 2001 ([Exhibit 2](#)).

Address	Action No.	Approval Year	No. of Units	Height (ft.)	Lot Size (sq. ft.)	Square Footage (original)	Square Footage (new)
700-702 E Palms Blvd	ZA-2001-3762-CDP-SPP	2002	0→1	23.6	5,740	vacant	3,200
710 E Palms Blvd (proposed)	DIR-2018-7237-CDP-MEL	2020	2→1	28	5,299	1,445	3,041
714-716 E Palms Blvd (proposed)	DIR-2018-7251-CDP-MEL	2020	2→1	29	5,299	1,986	1,758
723-725 E Palms Blvd	DIR-2018-706-CDP-MEL	2018	2→1	23	10,803	2,071	4,237
738 E Palms Blvd	DIR-2018-6377-CDP-SPP	2019	1→1	23	5,299	1,157	3,501
749 E Palms Blvd	DIR-2001-1654-SPP	2002	1→1	26.5	5,401	2,310	2,802

Average Square Footage (Original/New):	1,793	3,090
Net Loss/Gain in Units:	-2	

**Table 3.** Existing residences currently within the subject block that have not obtained permits or exemptions for redevelopment from either the City or the Commission since certification of the Venice LUP in 2001 ([Exhibit 2](#)).

Note: Residences 1603 and 1605 S Oakwood Ave. are located on E Palms Blvd but named for the abutting street to the east, Oakwood Avenue.

Address	Year Built	No. of Units	Lot Size (sq. ft.)	Square Footage
701-703 E Palms Blvd	1950	2	5,852	2,657
705 E Palms Blvd	1948	2	5,403	3,088
709-711 E Palms Blvd	1938	3	5,402	2,555
713 E Palms Blvd	1947	1	5,403	1,579
717-719 E Palms Blvd	1972	3	5,402	2,074
718-720 E Palms Blvd	1949	2	5,299	1,764
721 E Palms Blvd	1973	1	5,402	1,264
726 E Palms Blvd	1921	1	5,299	2,574
733-735 E Palms Blvd	1947	3	5,402	2,160
737 E Palms Blvd	1947	3	2,701	2,160
739 E Palms Blvd	1947	3	2,701	2,076
741 E Palms Blvd	1947	3	5,401	2,076
748 E Palms Blvd	1960	1	5,299	2,435
751 E Palms Blvd	1949	1	5,401	1,884
752 E Palms Blvd	1908	1	5,299	3,419
753 E Palms Blvd	1951	1	5,401	2,696
754 E Palms Blvd	1923	1	5,299	1,920
756 E Palms Blvd	1931	2	5,299	1,826
757 E Palms Blvd	1930	2	5,402	1,762
760 E Palms Blvd	1968	2	3,675	1,782
761 E Palms Blvd	1920	1	5,401	1,124



765 E Palms Blvd	1950	2	5,856	1,647
1603 S Oakwood Ave	1968	2	3,668	1,782
1605 S Oakwood Ave	1968	2	3,701	1,964
Total Number of Residences in Table:				24
Percentage of Multi-Unit Residences:				63%
Average Square Footage:				2,095

\*Information obtained from ZIMAS on September 12, 2020.