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Th14c

ADDENDUM

DATE: February 9, 2020

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: ADDENDUM TO ITEM TH14C, DE NOVO APPLICATION NO. A-5-VEN-20-0039 FOR THE COMMISSION MEETING OF THURSDAY, FEBRUARY 11, 2021.

I. PUBLIC CORRESPONDENCE

Since publication of the staff report on January 21, 2020, Commission staff has received one comment letter from Citizens Preserving Venice, the appellants of Appeal Nos. A-5-VEN-20-0039. The letter opposes the staff recommendation of approval for the project after de novo review, as summarized below and included within the Public Correspondence for this item.

The letter identifies concerns with the applicant's project design and questions whether the new duplexes proposed on adjacent lots (related but separate Items Th14b and Th14c) will be sufficient to maintain the multi-family community character of the surrounding area. The contentions raised by Citizens Preserving Venice (in bold) and staff's responses are detailed below:

- (1) The proposed duplex has been reduced in habitable area to accommodate a new pool and landscaped yard on-site, resulting in units too small to function as viable housing options. Commission staff recognize that the proposed duplex is approximately 210 sq. ft. smaller in habitable area than the existing duplex on-site. However, this reduction in size is minor. As discussed in the staff report findings on page 12, the two existing duplex units (768 sq. ft. and 1,200 sq. ft. in habitable area) are relatively similar in size to the currently-proposed duplex units (718 sq. ft. and 730 sq. ft.). Regarding the accessory dwelling unit (ADU), page 12 of the staff report discusses the sufficient amenities provided by the ADU and its feasibility as a housing option.
- (2) The similarity of the revised plans with the appealed project plans suggests the applicants intend to ultimately convert the duplex into a single-family

residence. The staff report includes findings on page 9 discussing the design of each proposed, separate dwelling unit, all of which will be accessed from separate entrances. In addition, Commission staff further addressed this concern through the revision of Special Condition 1 to require maintenance of two duplex units on-site with no construction of ingress/egress between duplex units.

- (3) The two adjacent duplexes may share access to the pool proposed for 714-716 E. Palms Blvd, creating a functional compound without the need for a lot consolidation. The project plans, included as Exhibit 3 of the staff report, show a 6ft. high wood fence and gate enclosing the perimeter of each separate duplex. The two duplexes have been designed with distinct parking spaces, yard areas, and units, all of which suggest two separate multi-family residences. The letter indicates a previous Commission finding of substantial issue on two projects at 416-422 Grand Blvd.¹ as a relevant example. However, these projects involved the construction of a primary single-family residence and smaller secondary residence arranged around a shared pool area, resulting in a loss of housing density and a consolidated compound. As such, this past Commission action is distinct from the current projects which will preserve housing density and include 6-ft. high fences around the perimeter of each separate duplex.
- (4) The proposed parking configuration on-site is infeasible and will likely require residents to park off-site. To address this concern, the project applicant has submitted the following description of the five parking spaces proposed within the rear-yard on-site:

"Unit 1 and Unit 2 share an enclosed garage. Within this garage, Unit 1 has one standard parking space and one compact parking space provided by the top level of the vehicle lift platform. The lower level of the vehicle lift is reserved for one compact guest parking space, which can be accessed and used without knowledge of the lift system. Unit 2 has one compact parking stall provided within the enclosed garage. Outside of the garage, Unit 2 has one standard parking stall shown in parallel. This parallel stall is shown as such to meet LADBS back up aisle requirements. Per code, the back up space provided within a parallel stall makes the stall appear to be in tandem with the Unit 1 parking spaces. In reality, the size of a single car within the space shown will exist in tandem only with the other space provided for Unit 2, using this additional back up space only when entering and exiting the space."

(5) The project plans show discrepancies in estimated areas and setback lengths, as well as mis-labeled or missing amenities throughout the units The applicants have submitted plans (dated February 8, 2021) revised to correct inaccuracies and more clearly show the location of the proposed bathrooms and dining areas throughout the units. It is important to note that these revised plans have not altered any of the area estimations proposed with the plans dated January 19, 2021. The plans dated February 8, 2021 shall replace the plans included in Exhibit 3 of the staff report and are attached to this addendum. Commission staff

¹ ref. Appeal Nos. <u>A-5-VEN-15-0026 and A-5-VEN-15-0027</u>

have also compiled the following table, which lists relevant parameters of the existing and proposed development:

Proposed	Area (sq. ft.)	Existing	Area (sq. ft.)
Unit 1 (excluding decks)	718	Unit 1	768
Unit 2 (excluding decks)	730	Unit 2	1,200
ADU	310	N/A	N/A
Total habitable area	1,758	Total habitable area	1,968
Pool	738	N/A	N/A
Landscaped yard	709	Landscaped yard	Unknown
Garage (attached)	523	Garage (detached)	627
Parking on-site	5 spaces	Parking on-site	3 spaces

Parameters for 714-716 E. Palms Blvd.

II. REVISIONS TO STAFF REPORT

Commission staff recommends changes to the staff report dated January 21, 2020 to make the following corrections and modifications. These revisions are necessary to clarify discrepancies in the project area estimations due to incorrect inclusion of attached deck area in the total habitable area for each unit. Additionally, all references to a junior accessory dwelling unit (JADU) shall be modified to reflect an accessory dwelling unit (ADU) in the staff report findings consistent with the JADU/ADU terminology of the State ADU laws and the Los Angeles Municipal Code. Language to be added is shown in <u>underlined text</u>, and language to be deleted is identified by strikethrough.

a) Correct the first sentence of the project description on page 1 as follows:

Demolition of a one-story, 1,968 sq. ft. duplex and detached three-car garage, and construction of a two-story, 29.5-ft. tall, 1,540 1,448 sq. ft. duplex with an attached three-car garage, plus two additional on-site parking spaces, and an attached 310 sq. ft. junior accessory dwelling unit on a 5,299 sq. ft. lot.

b) Correct the first incomplete paragraph of the "Summary of Staff Recommendation" on page 1 as follows:

On November October 8, 2020, the Commission determined that a substantial issue existed with respect to the grounds on which Appeal No. A-5-VEN-20-0039 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 and now proposes the demolition of the existing one-story, 1,968 sq. ft. duplex and detached three-car garage, and construction of a new two-story, 29.5-ft. tall, 1,540 1,448 sq. ft. duplex with an attached 310 sq. ft JADU and five on-site parking spaces.

c) Modify the first sentence of the third complete paragraph on page 2 as follows:

Therefore, staff recommends approval of the de novo coastal development permit (CDP) A-5-VEN-20-0039 with eight (8) special conditions: 1) Permit Compliance Retention of Two Duplex Units On-Site; 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.

d) Modify Special Condition 1 on page 5 as follows:

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. Retention of Two Duplex Units On-Site. The development approved by Coastal Development Permit No. A-5-VEN-20-0039 is for construction of a duplex with a 310 square foot accessory dwelling unit (ADU). The applicants and all assigns/successors shall maintain two duplex units as separate residential units. At no point may the duplex be converted into a single-family residence or converted to a non-residential use. Construction of interior ingress and egress (doors) between duplex units are prohibited.

e) Correct the fourth sentence of the first complete paragraph on page 9 as follows:

On November October 8, 2020, the Commission determined that a substantial issue existed with respect to the grounds on which Appeal No. A-5-VEN-20-0039 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.

 f) Correct the first and second sentence of the second complete paragraph on page 9 as follows: The project now proposes demolition of the existing duplex and construction of a new two-story, 29.5-ft. high, 1,540 1,448 sq. ft. duplex with a 310 sq. ft. JADU located on the first floor (Exhibit 3). The JADU will include one bedroom, one bathroom with a window, a kitchen, and a side-yard entrance separate from those of the other residential units.

g) Correct the fifth sentence of the second complete paragraph on page 9 as follows:

The second unit, approximately 822 730 sq. ft. in area, is accessed from the first floor and occupies both levels of the residence.

h) Correct the fourth and fifth sentences of the third complete paragraph on page 9 as follows:

The project also includes a 738 sq. ft. swimming pool in the front-yard that extends up to 7-ft. deep and is proposed within the 15 14.7-ft. front-yard setback. In addition to a 15 14.7-ft. front-yard setback, the development will retain a 15 14.7-ft. setback in the rear-yard and 4-ft. setbacks in the side-yards.

i) Correct the second sentence of the second incomplete paragraph on page 12 as follows:

The proposed project will replace the existing duplex with two units that are proportional to one another in size (718 sq. ft. and 822 <u>730</u> sq. ft.).

j) Modify the fourth sentence of the second incomplete paragraph on page 12 as follows:

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 applicants to maintain two duplex units on-site and prohibits construction of ingress or egress (doors) between the duplex units. 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.

 k) Correct the second sentence of the fourth complete paragraph on page 13 as follows:

The proposed development includes $15 \underline{14.7}$ -ft. front and rear-yard setbacks, as well as 4-ft. side-yard setbacks, that will be compatible with the surrounding residence setbacks.

I) Correct the third sentence of the first complete paragraph on page 14 as follows:

Regarding mass and scale, tables 1-3 show that the proposed total habitable area of the duplex (1,850 1,758 sq. ft.) is comparable in size to multiple original and redeveloped surrounding homes.

m) Modify the third sentence of the second incomplete paragraph on page 14 as follows:

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 applicants to maintain two duplex units on-site and prohibits construction of ingress or egress (doors) between the duplex units.

n) Modify the first sentence of the third complete paragraph on page 18 as follows:

Special Condition 1 requires the development to be carried out in a manner consistent with the proposed project, as approved and conditioned applicants to maintain two duplex units on-site and prohibits construction of ingress or egress (doors) between the duplex units.

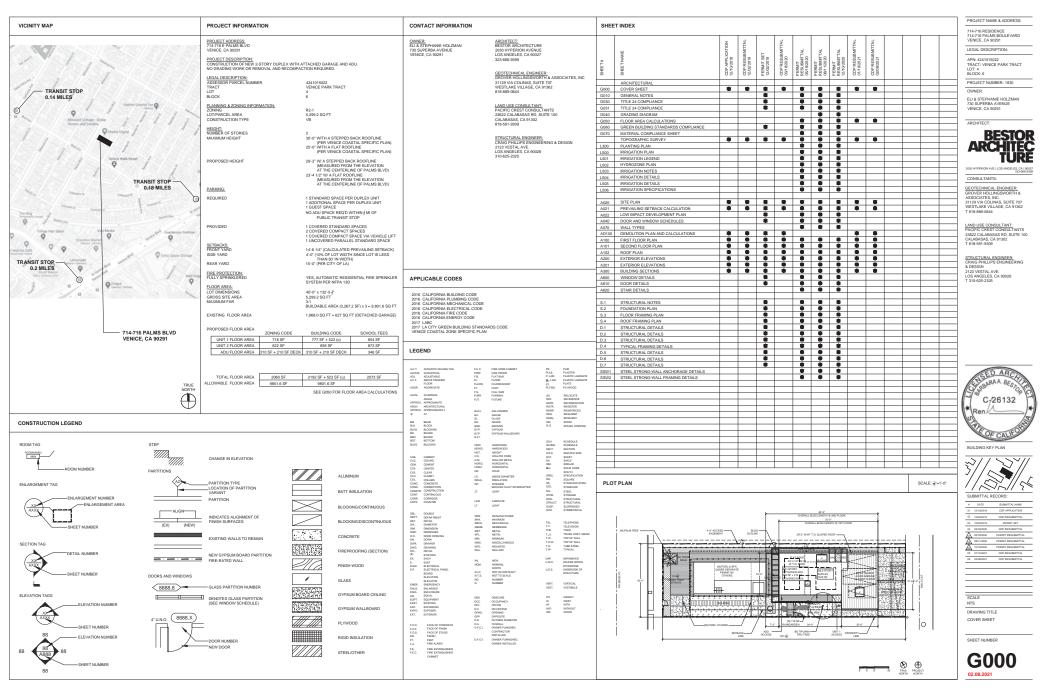
o) Correct the fourth sentence of the third complete paragraph on page 18 as follows:

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 0039), 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.

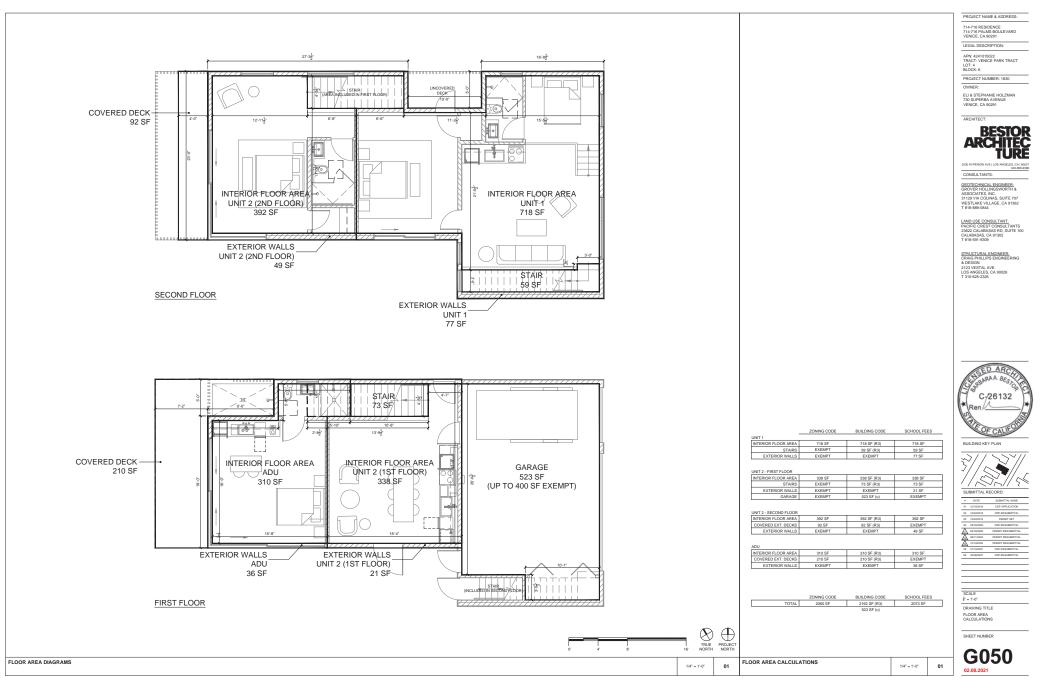
 p) Correct the first and second sentences of the eighth complete paragraph on page 20 as follows:

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 $15 \ 14.7$ -ft. setbacks in the front and rear-yards, with 4-ft. setbacks in the side-yards.

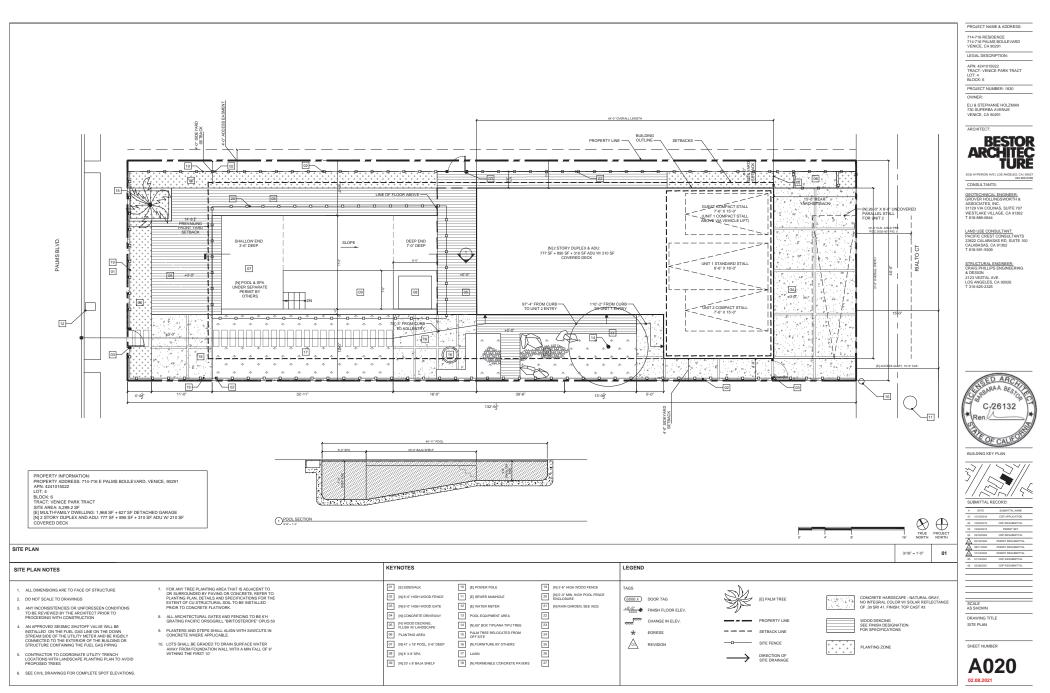
Exhibit 3– Revised Project Plans (dated February 8, 2021)



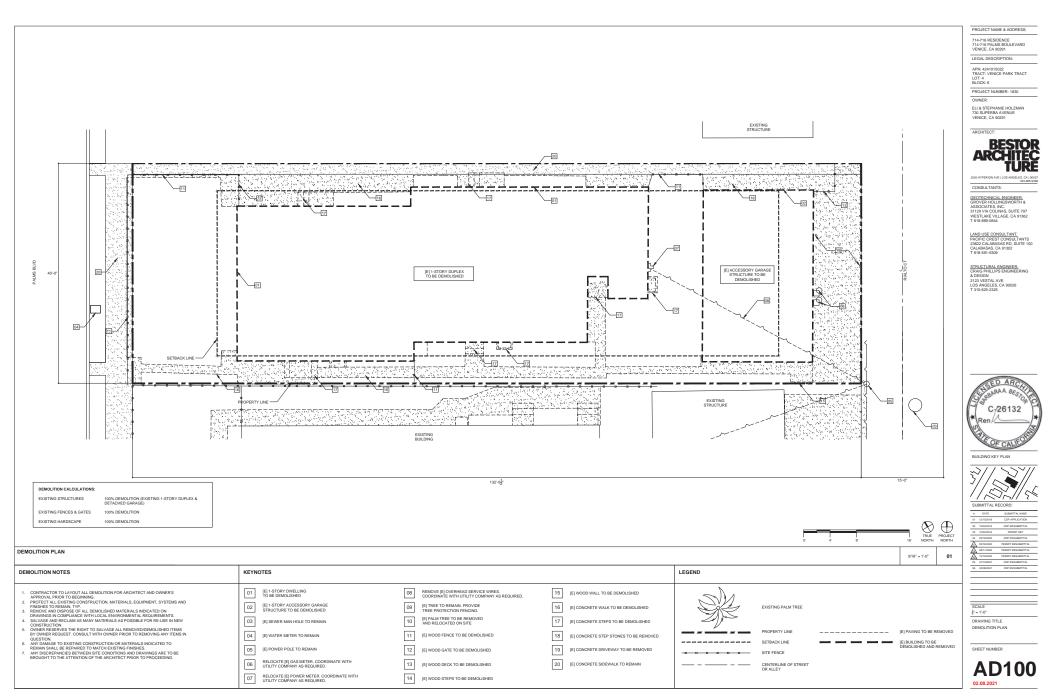
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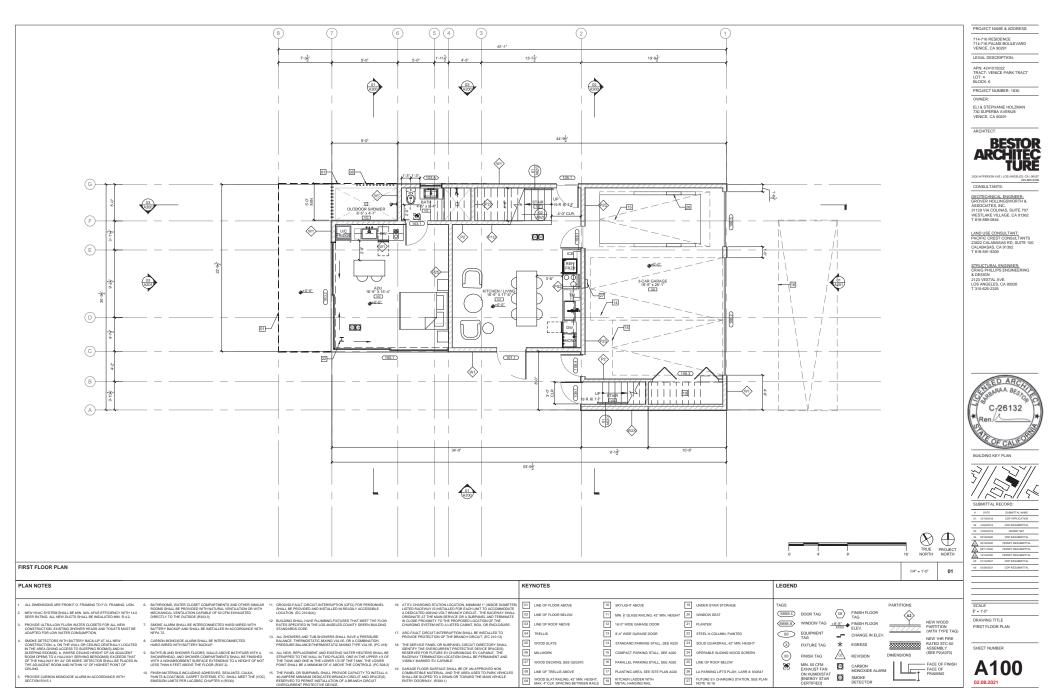
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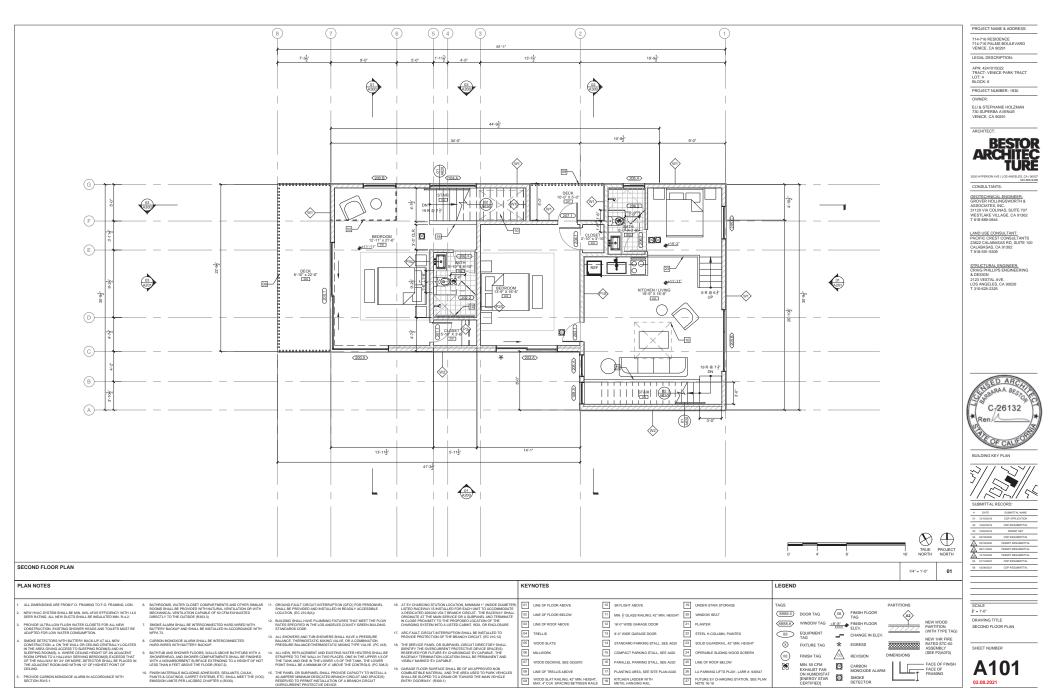
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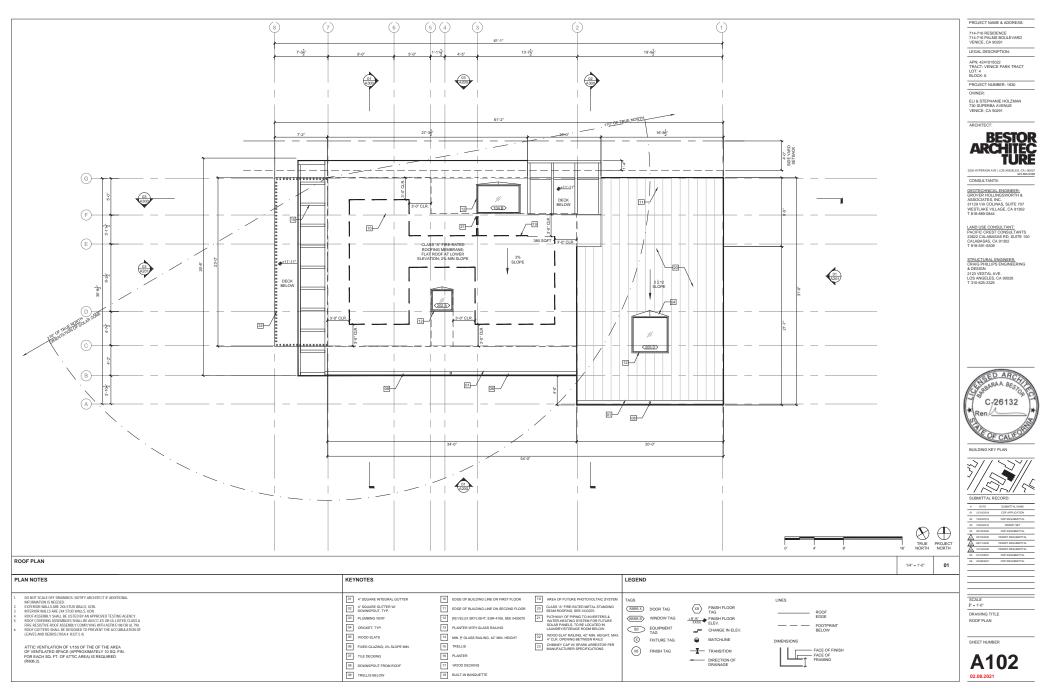
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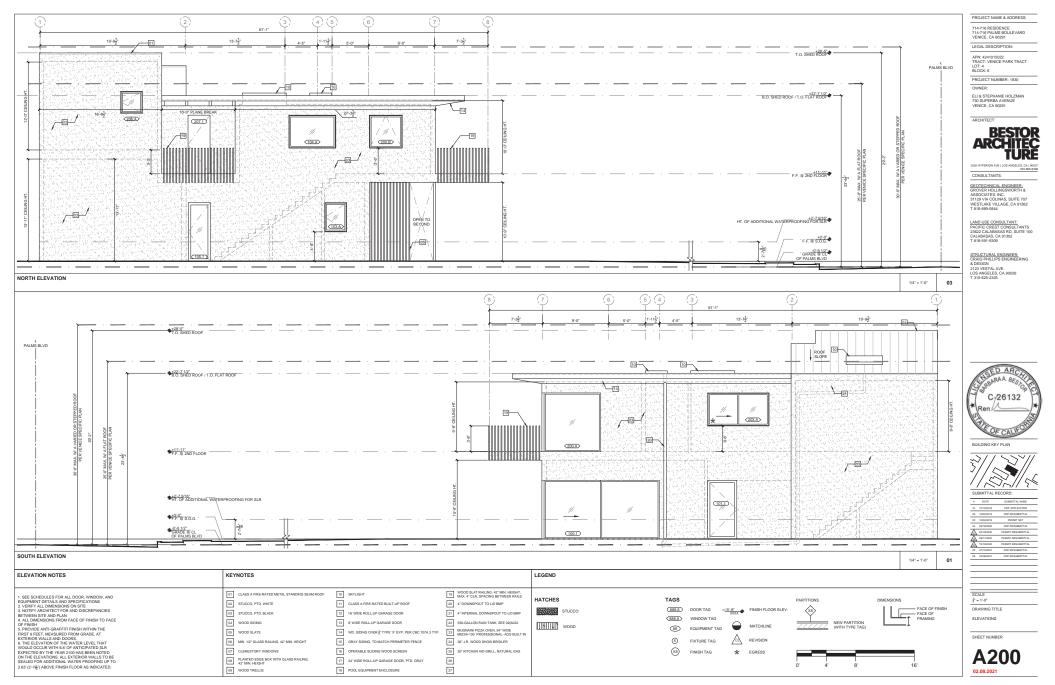
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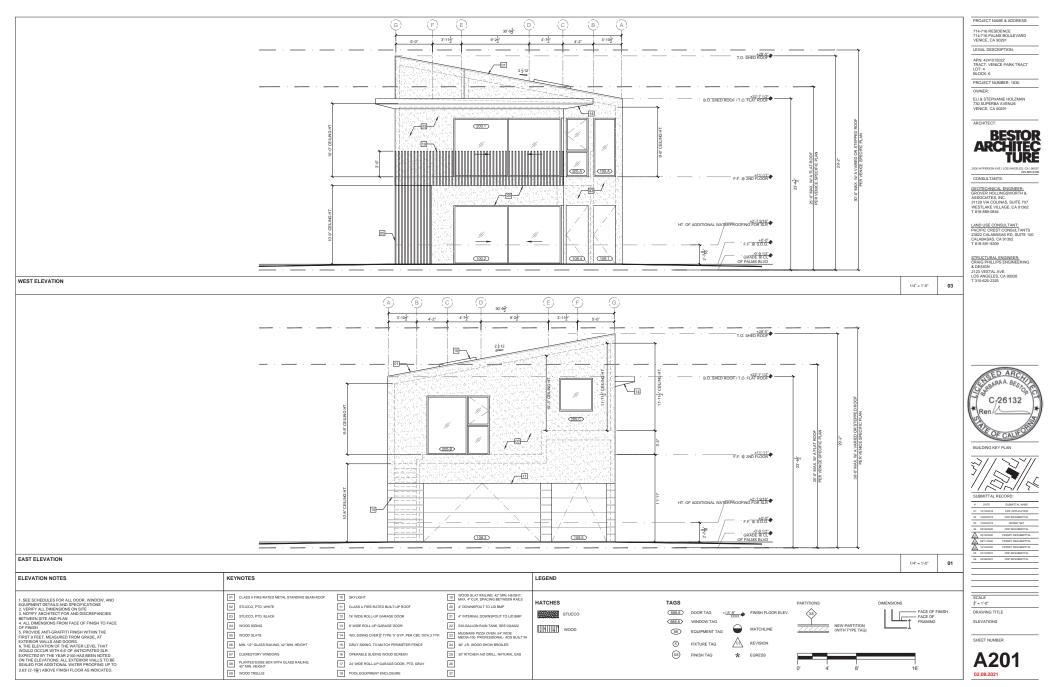
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