

CALIFORNIA COASTAL COMMISSION

South Coast District Office  
301 E Ocean Blvd., Suite 300  
Long Beach, CA 90802-4830  
(562) 590-5071



W14a

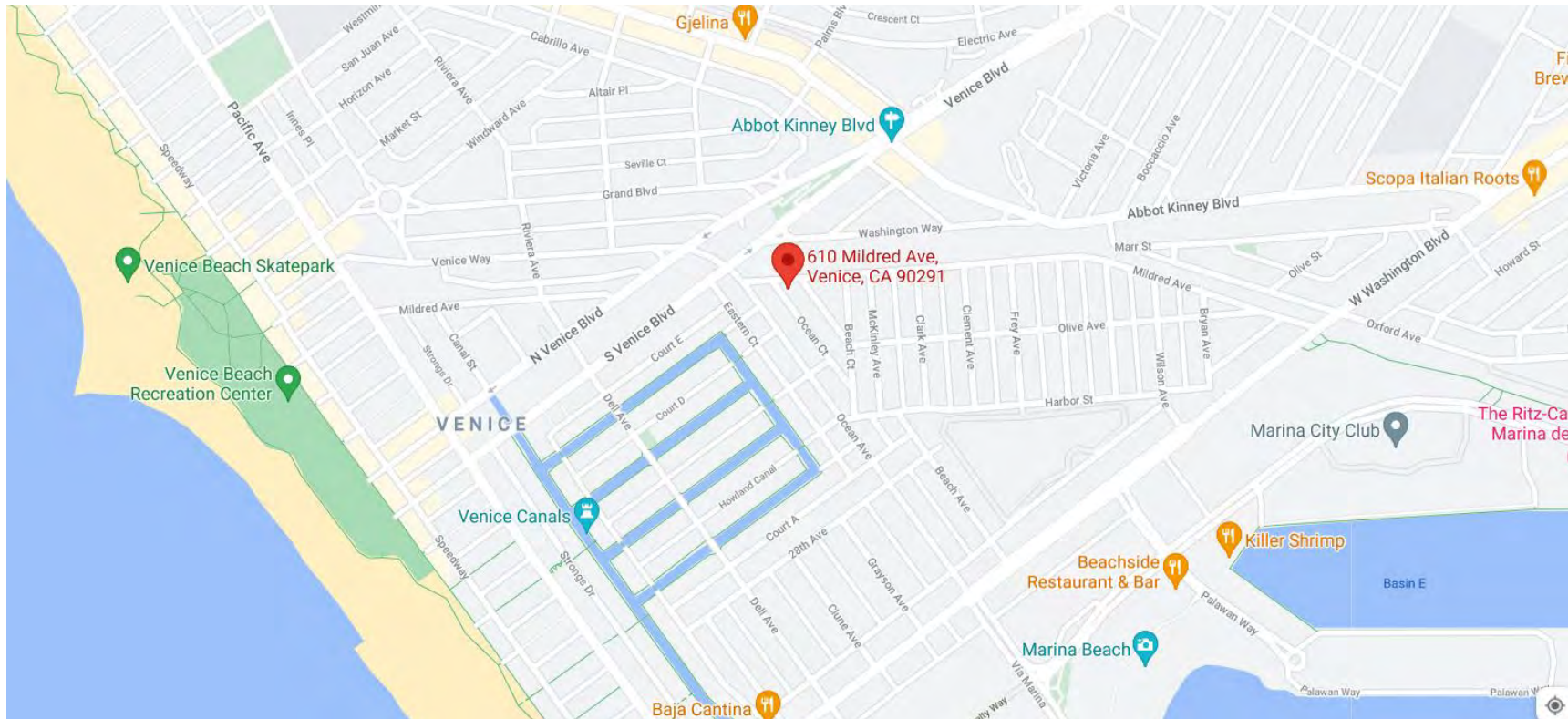
A-5-VEN-21-0036 (Goldstein)

July 7, 2021

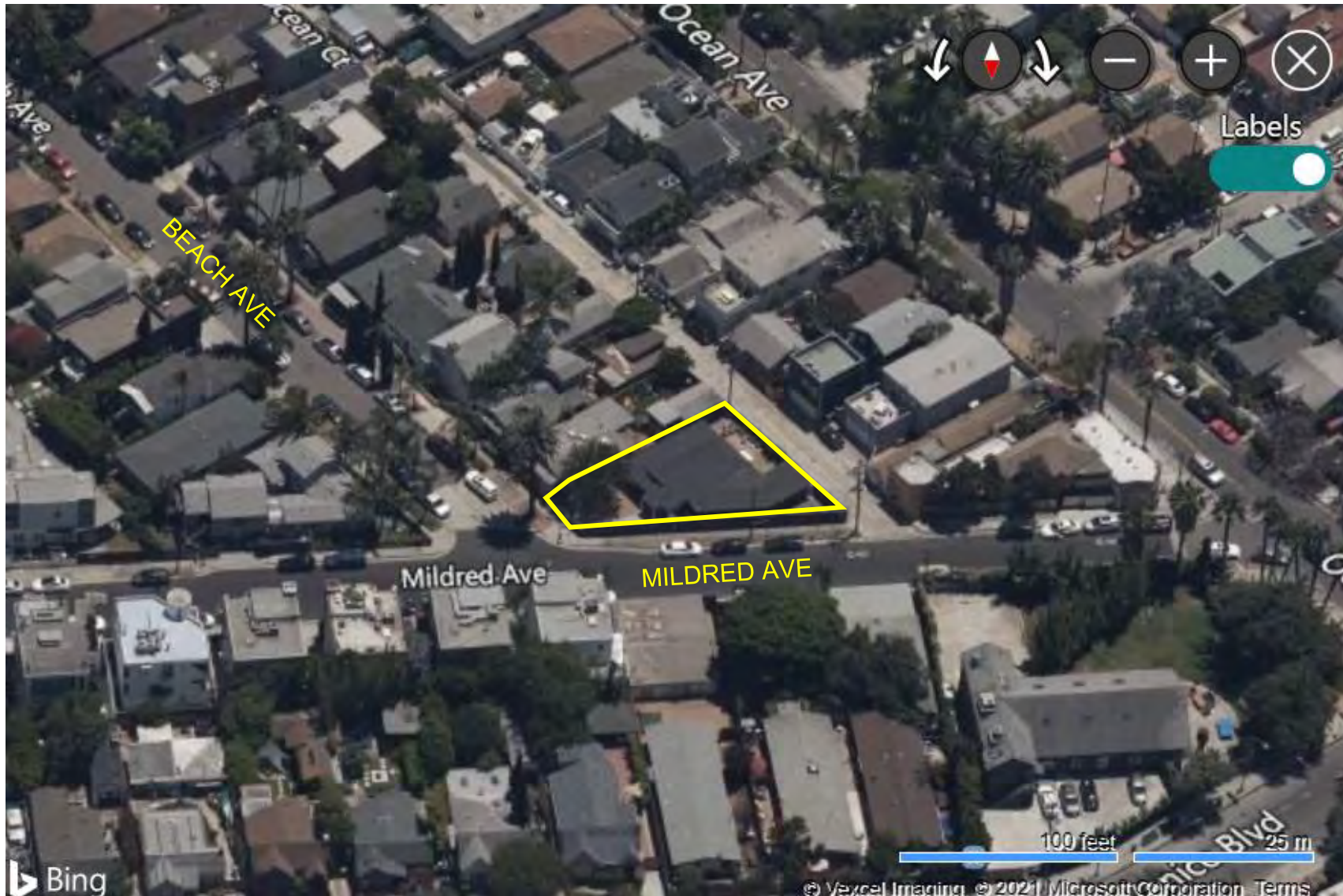
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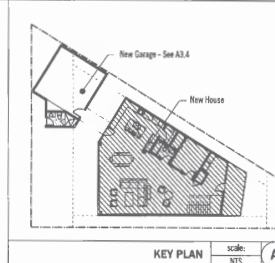
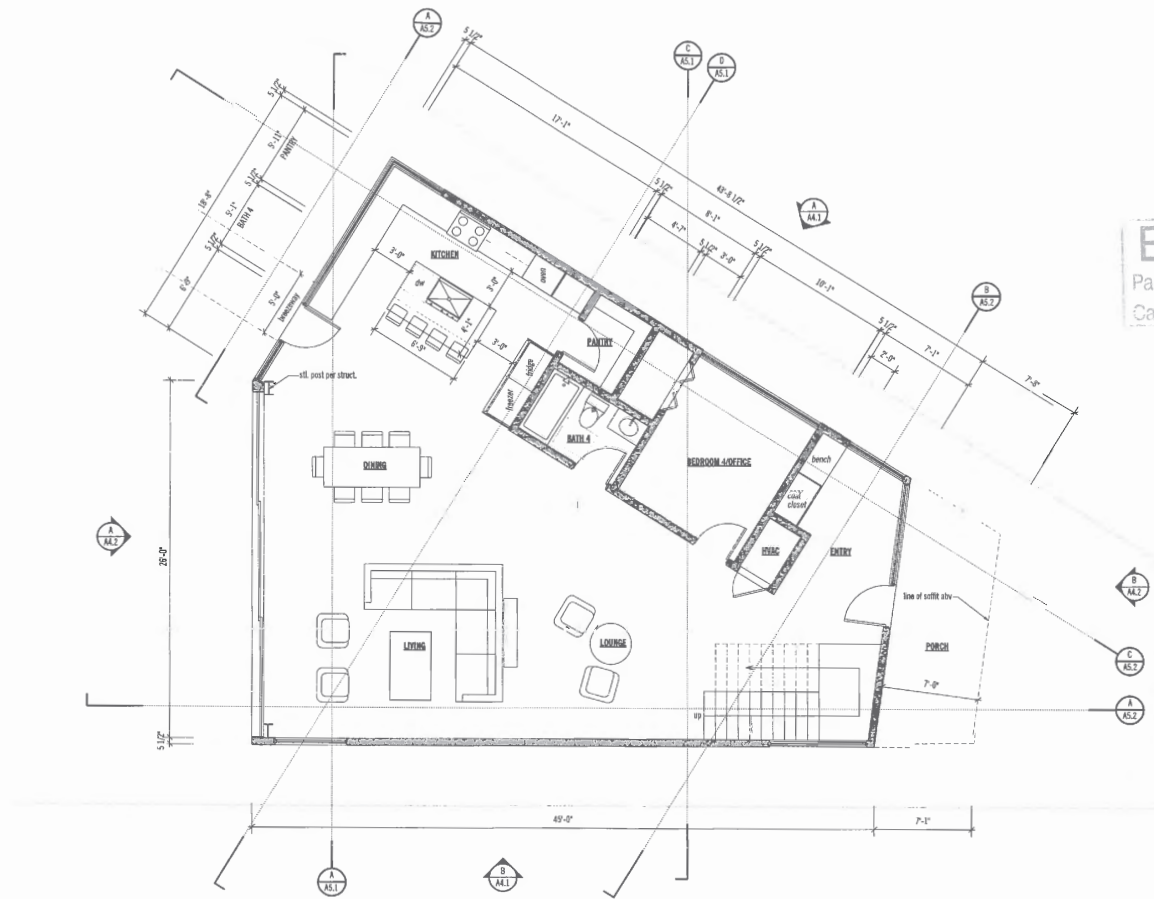
# VICINITY MAP



## PROJECT SITE







**EXHIBIT "A"**  
 Page No. 5 of 13  
 Case No. D18-1620-3520-CDP-A EL

**MILDRED610**  
 610 MILDRED AVE.  
 VENICE, CA 90291

**yfe**  
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**LEGEND**

- (E) walls to be removed
- New walls - 2x4 framing @ 16" O.C. UOIN
- 1 hour rated wall - see detail 10A.1
- combo smoke & carbon monoxide detector
- Emergency Star/Bathroom ventilation fan, 50 CFM min.
- door tag
- window tag

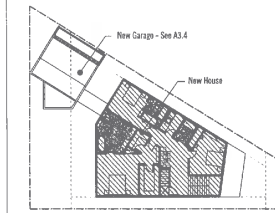
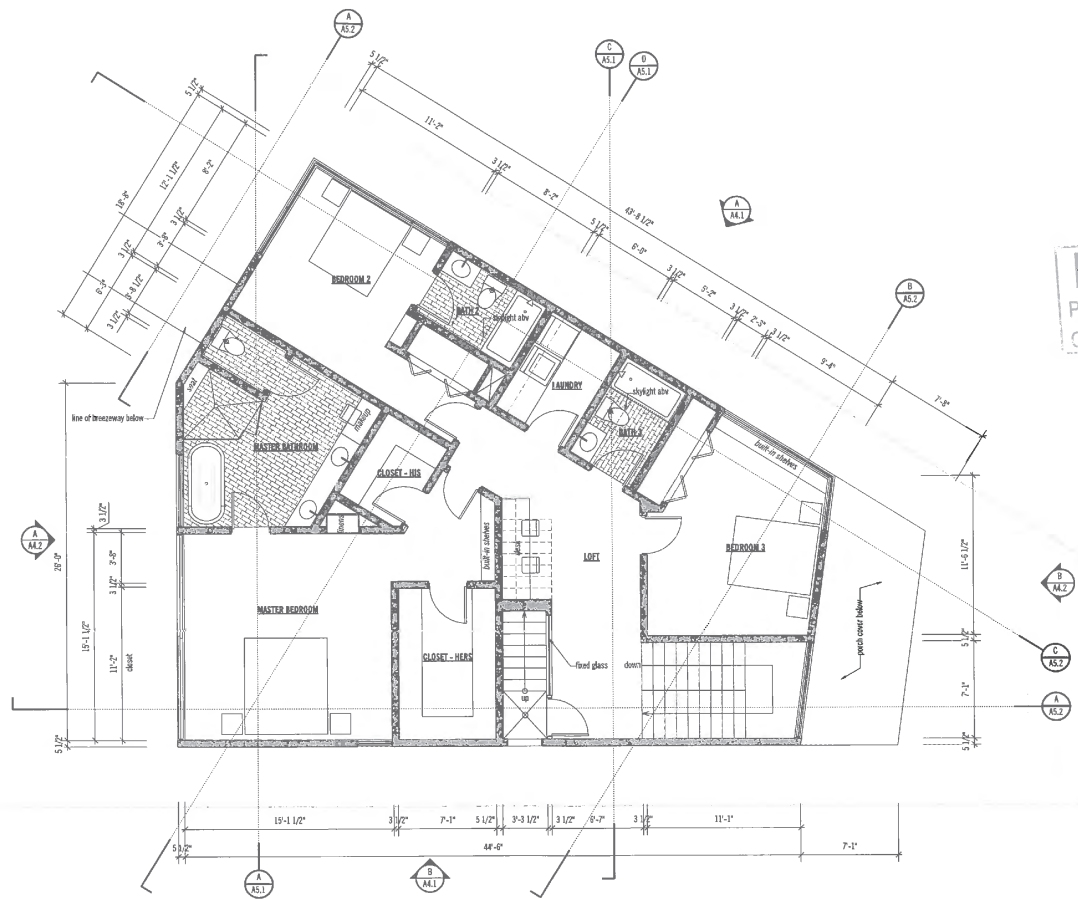
**CDP case filing** 06/02/20  
**VSF** 04/15/20  
**SD** 04/06/20

**PLANS NORTH**  
 1/4" = 1'-0"

**FIRST FLOOR PLAN**

**A3.1**

September 04, 2020



KEY PLAN  
Scale: NTS  
A

**EXHIBIT "A"**  
Page No. 6 of 13  
Case No. 018-1620-5520-WP-MEC

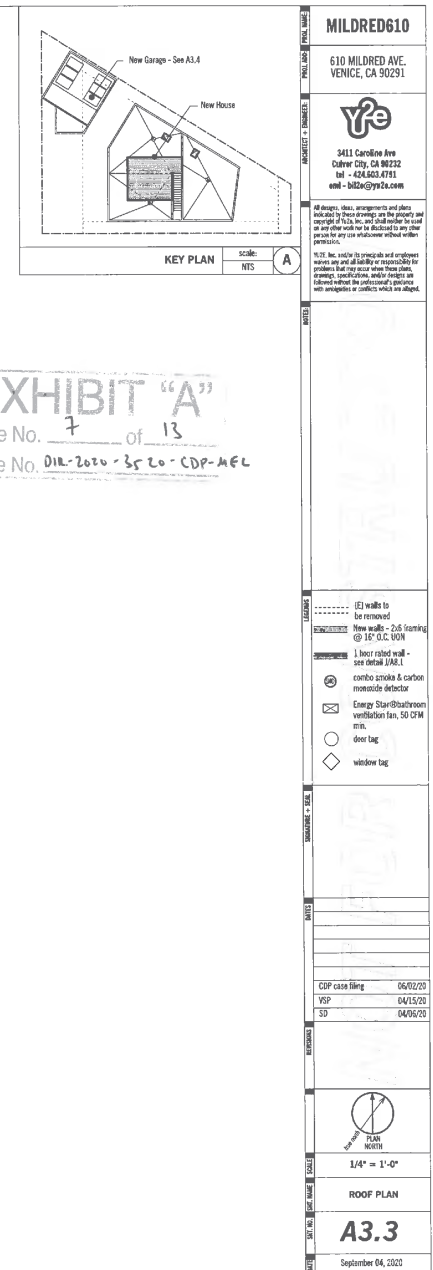
**MILDRED610**  
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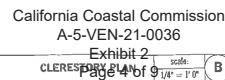
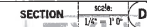
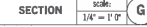
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DATE	DESCRIPTION	BY
06/02/20	CDP case filing	
04/15/20	VSP	
04/06/20	SD	

1/4" = 1'-0"  
 SECOND FLOOR PLAN  
**A3.2**  
 September 04, 2020





SECTION DE PC D  
EXHIBIT "A"  
Page No. 8 of 13  
Case No. D1R-2020-3560-CDP-M

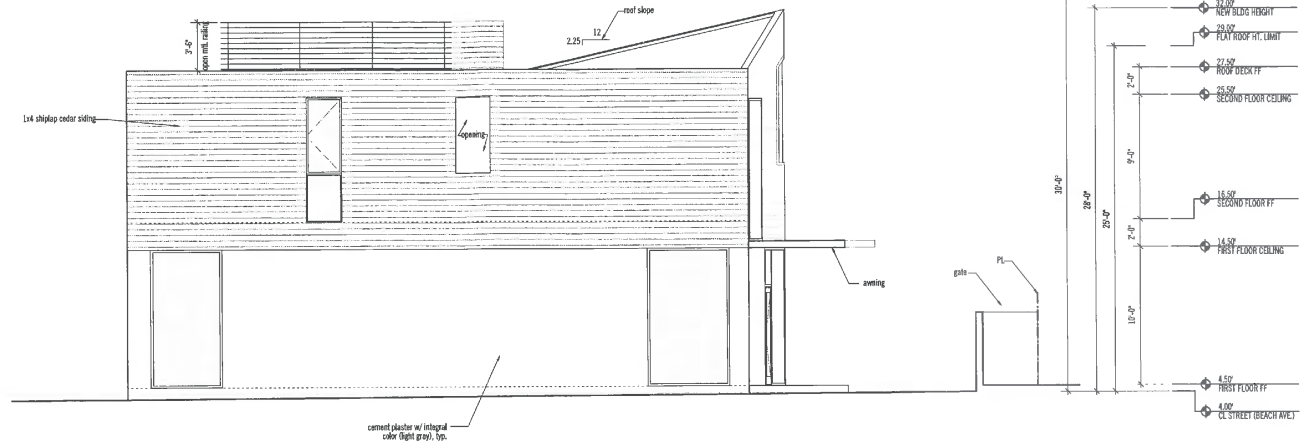
### A3.4

September 04, 2020

# EXHIBIT "A"

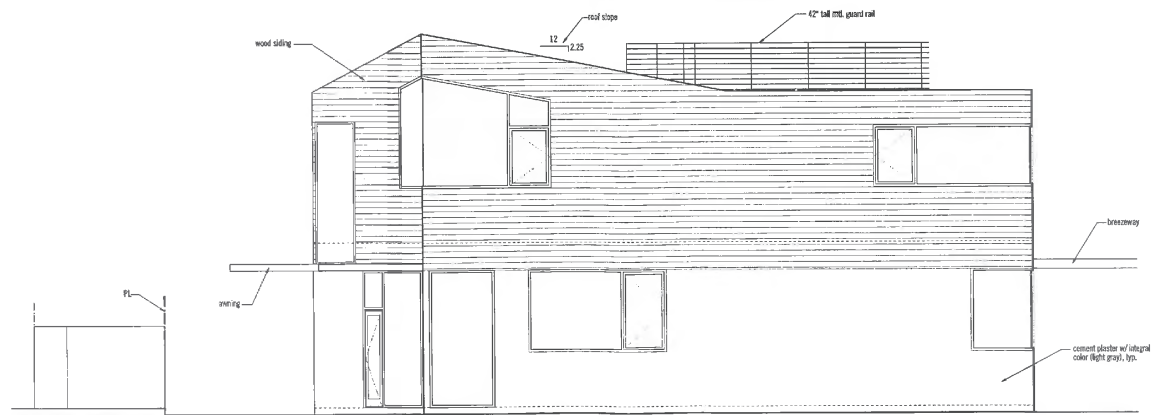
Page No. 9 of 13  
Case No. D18-2020-35LO-CDP-MFL

NOTE: NO ROOF ACCESS STRUCTURE PROPOSED



ELEVATION scale: 1/4" = 1'-0"

NOTE: NO ROOF ACCESS STRUCTURE PROPOSED



ELEVATION scale: 1/4" = 1'-0"

California Coastal Commission  
A-5-VEN-21-0036  
Exhibit 2  
Page 5 of 9

MILDRED610

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CDP case filing 06/02/20  
VSP 04/15/20  
SD 04/06/20

1/4" = 1'-0"

ELEVATIONS

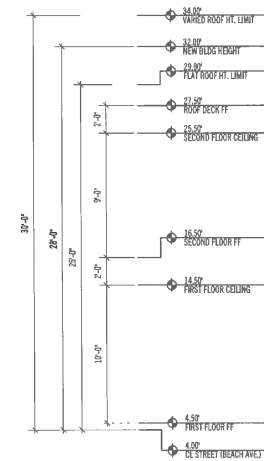
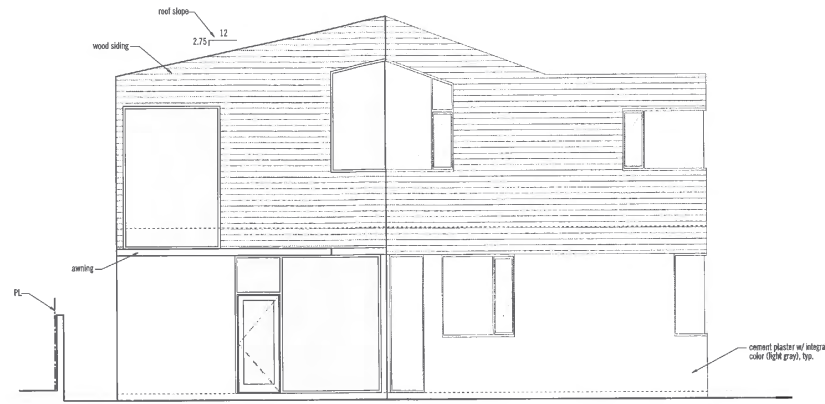
A4.1

September 04, 2020



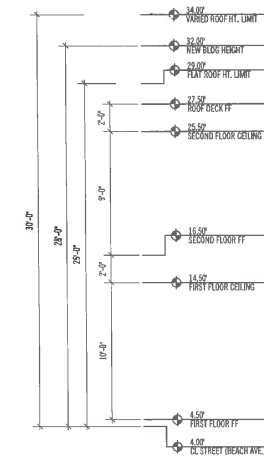
**EXHIBIT "A"**  
 Page No. 10 of 13  
 Case No. 19-2020-3520-CDP-MEL

NOTE: NO ROOF ACCESS STRUCTURE PROPOSED



ELEVATION scale: 1/4" = 1'-0" B

NOTE: NO ROOF ACCESS STRUCTURE PROPOSED



ELEVATION scale: 1/4" = 1'-0" A

California Coastal Commission  
 A-5-VEN-21-0036  
 Exhibit 2  
 Page 6 of 9

MILDRED610

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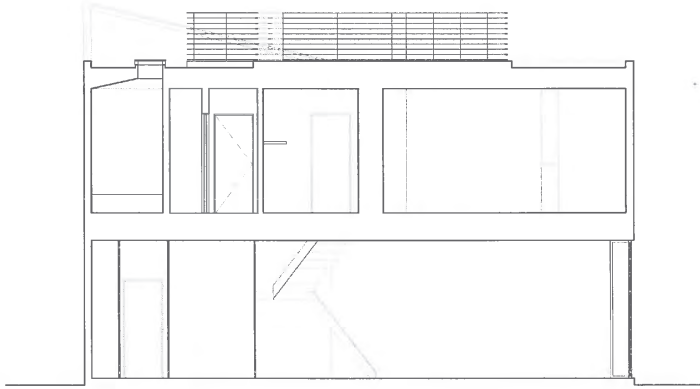
1/4" = 1'-0"

ELEVATIONS

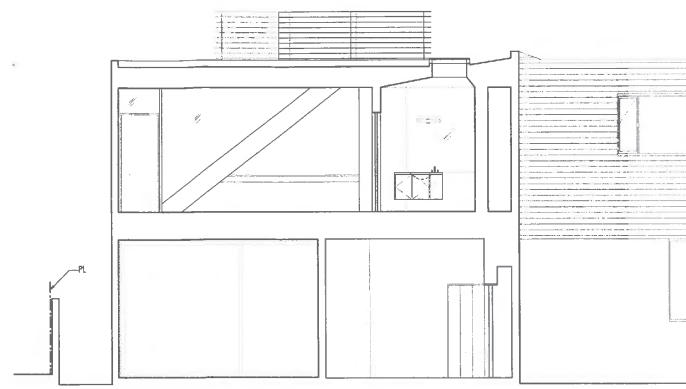
**A4.2**

September 04, 2023

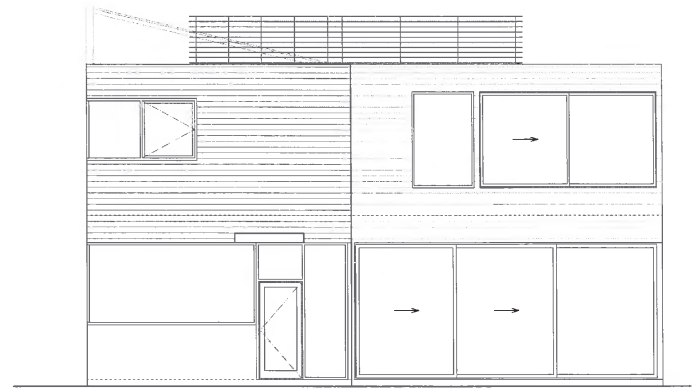
**EXHIBIT "A"**  
 Page No. 11 of 13  
 Case No. D12-2020-3520-CDP-A66



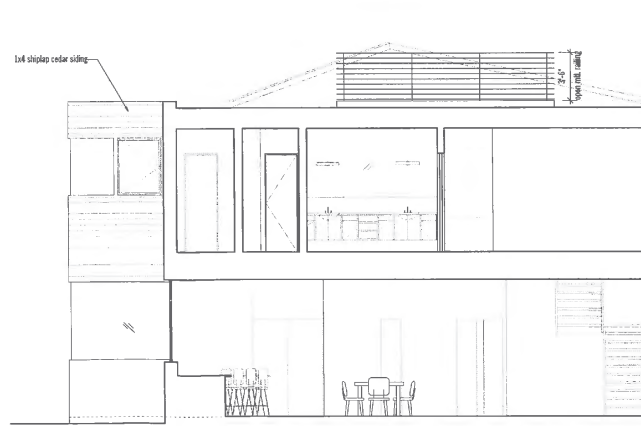
SECTION D  
 scale: 1/4" = 1'-0"



SECTION C  
 scale: 1/4" = 1'-0"



SECTION B  
 scale: 1/4" = 1'-0"



California Coastal Commission  
 A-5-VEN-21-0036  
 Exhibit 2  
 Page 7 of 9

- 24'-0" VARED ROOF HT. LIMIT
- 32'-0" NEW BLDG HEIGHT
- 29'-0" FLAT ROOF HT. LIMIT
- 27'-5" ROOF DECK FF
- 25'-5" SECOND FLOOR CEILING
- 16'-5" SECOND FLOOR FF
- 14'-5" FIRST FLOOR CEILING
- 4'-10" FIRST FLOOR FF
- 4'-0" CL STREET (BEACH AVE.)

SECTION A  
 scale: 1/4" = 1'-0"

**MILDRED610**

610 MILDRED AVE.  
 VENICE, CA 90291



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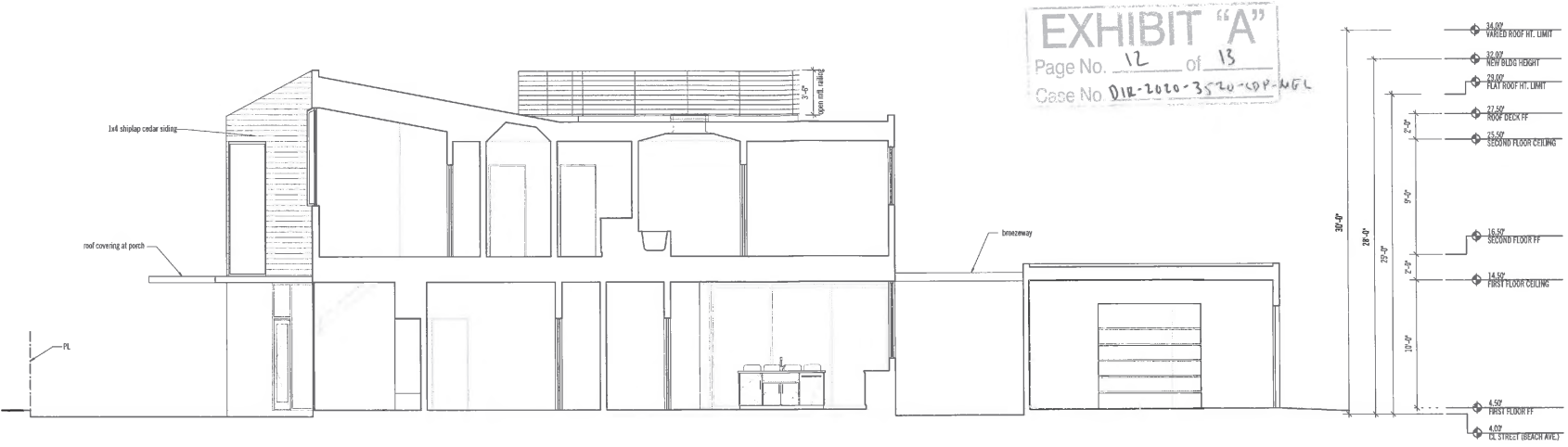
CDP case filing 06/02/20  
 VSP 04/15/20  
 SD 04/06/20

1/4" = 1'-0"

SECTIONS

**A5.1**

September 04, 2020



MILDRED610

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VENICE, CA 90291

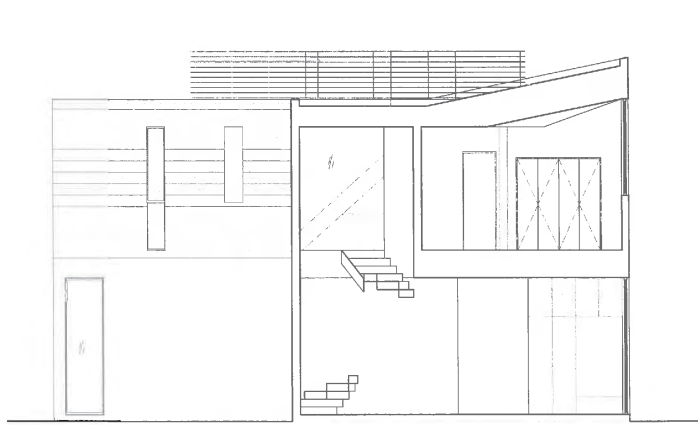


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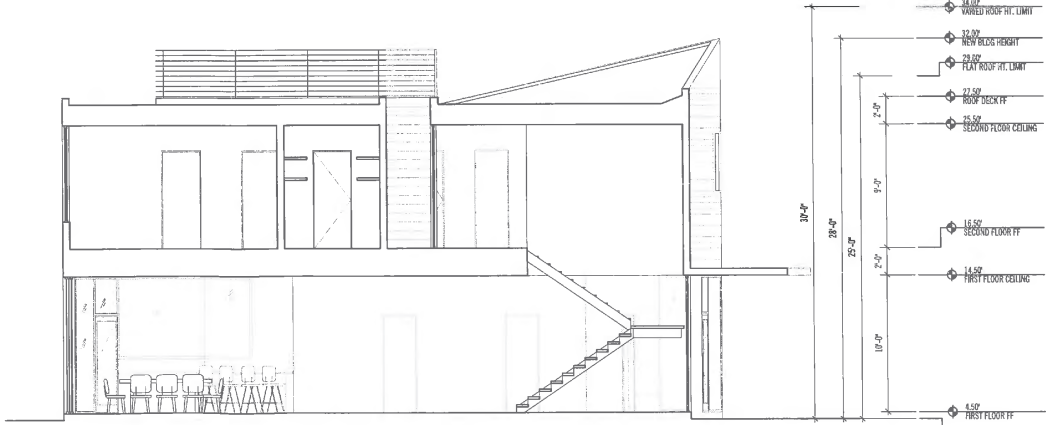
SECTION scale: 1/4" = 1'-0"

C



SECTION scale: 1/4" = 1'-0"

B



SECTION scale: 1/4" = 1'-0"

A

California Coastal Commission  
A-5-VEN-21-0036  
Exhibit 2  
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CIP case filing 06/02/20  
VSP 04/15/20  
SD 04/06/20

1/4" = 1'-0"

SECTIONS

A5.2

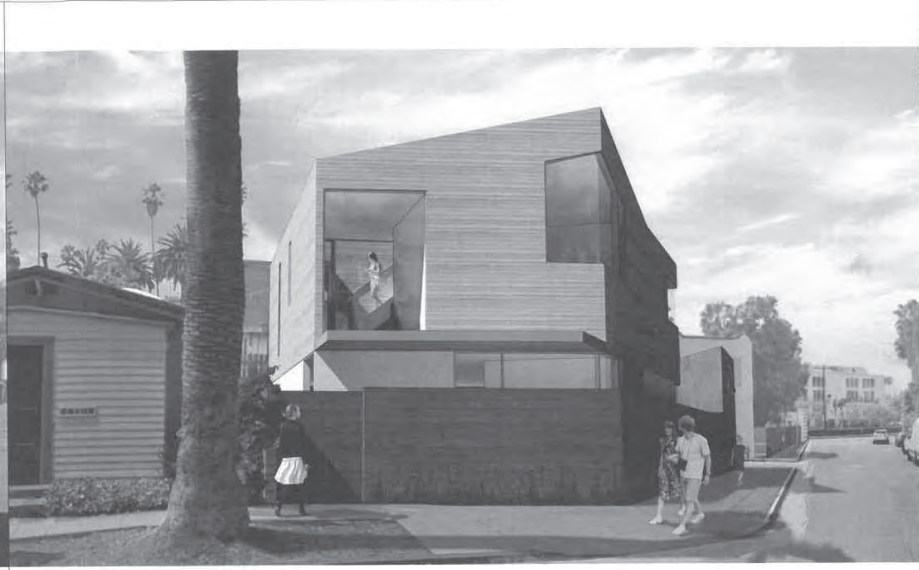
September 04, 2020



VIEW FROM SW

scale:  
not to scale

B



VIEW FROM NE CORNER OF MILDRED AND BEACH

scale:  
not to scale

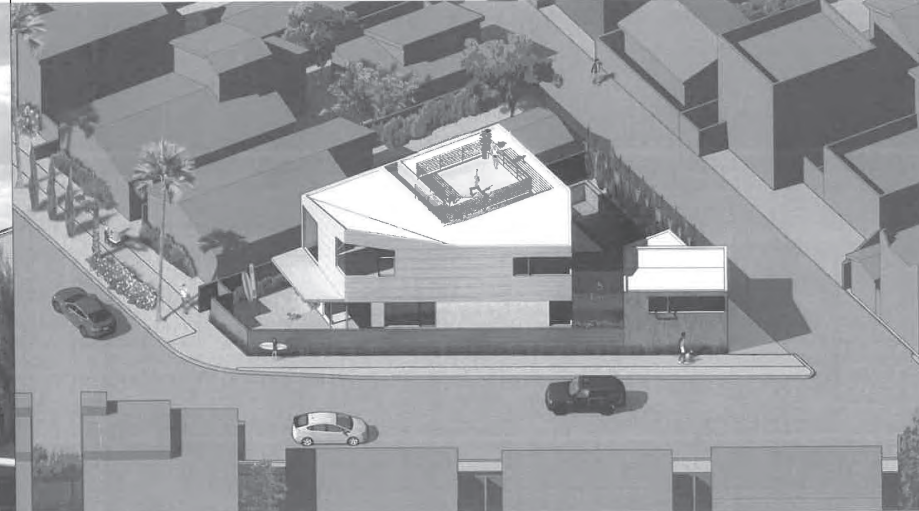
A



VIEW FROM BACKYARD

scale:  
not to scale

D



OVERHEAD AXONOMETRIC VIEW

scale:  
not to scale

C

California Coastal Commission  
A-5-VEN-21-0036

Exhibit 2  
Page 9 of 9

MILDRED610

610 MILDRED AVE.  
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**Y2e**

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EXHIBIT "A"  
Page No. 13 of 13  
Case No. Div. 2020-5520-COP-MCU

CDP case filing 05/02/20  
VSP 04/15/20  
SD 04/06/20

NOT TO SCALE

RENDERS

**A6.1**

September 04, 2020

**DEPARTMENT OF  
CITY PLANNING**

COMMISSION OFFICE  
(213) 978-1300

**CITY PLANNING COMMISSION**

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PRESIDENT

VAHID KHORSAND  
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**CITY OF LOS ANGELES  
CALIFORNIA**



ERIC GARCETTI  
MAYOR

**EXECUTIVE OFFICES**

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LOS ANGELES, CA 90012-4801  
(213) 978-1271

VINCENT P. BERTONI, AICP  
DIRECTOR

KEVIN J. KELLER, AICP  
EXECUTIVE OFFICER

SHANA M.M. BONSTIN  
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR

VACANT  
DEPUTY DIRECTOR

**DIRECTOR'S DETERMINATION**

January 7, 2021

**Owner/Applicant**

Gregory Goldstein &  
Annette Goldstein  
716 18<sup>th</sup> Street  
Santa Monica, CA 90402

**Representative**

Bill Tsui  
Yu2e, Inc.  
3411 Caroline Avenue  
Culver City, CA 90232

**Case No.** DIR-2020-3520-CDP-MEL

**Related Case:** ADM-2020-3521-VSO

**CEQA:** ENV-2020-3522-CE

**Location:** 610 East Mildred Avenue

**Council District:** 11 - Bonin

**Neighborhood Council:** Venice

**Community Plan Area:** Venice

**Specific Plan:** Venice Coastal Zone –  
Southeast Venice Subarea

**Land Use Designation:** Low Residential

**Zone:** R1-1-O

**Legal Description:** Lot 136, Tract TR 3533

**Last Day to File an Appeal:** January 22, 2021

**Determined**, based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Sections 15301 (Class 1) and 15303 (Class 3), and that there is no substantial evidence demonstrating that an exception to a Categorical Exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.20.2, I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

**Approve** a Coastal Development Permit for the demolition of a one-story single-family dwelling and detached garage and the construction of a new two-story, 3,008 square-foot single-family dwelling, 423 square-foot accessory structure (garage and bathroom), and swimming pool, providing three parking spaces, located in the Single Permit Jurisdiction area of the Coastal Zone; and

Pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures I hereby:

**Approve** a Mello Act Compliance Review for the demolition of one Residential Unit and the construction of one new Residential Unit in the Coastal Zone.

The project approval is based upon the attached Findings, and subject to the attached Conditions of Approval:

California Coastal Commission

A-5-VEN-21-0036

Exhibit 3

Page 1 of 17



## CONDITIONS OF APPROVAL

1. Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.
2. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
3. **Density.** One new single-family dwelling shall be constructed.
4. **Height.** Projects having a varied roofline (slope greater than 2:12) shall not exceed a maximum height of 30 feet, provided that any portion of the roof that exceeds 25 feet is set back from the required front yard at least one foot in depth for every foot in height above 25 feet measured from the centerline of Beach Avenue to the highest point of the roof excluding roof deck railings that do not exceed 42 inches and are of an open design. As shown in Exhibit A, the project proposes a varied roof with a maximum height of 28 feet. The roof deck railings as proposed are 42 inches and composed of open metal railings.
5. **Parking and Access.** The subject project shall provide three parking spaces onsite, at least two space shall be enclosed (detached garage). Parking shall be accessed from the rear alley, Ocean Court. Parking layout shall be to the satisfaction of the Department of Building and Safety.
6. **Roof Structures.** Chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the height limit by a maximum of five feet.
7. No deviations from the Venice Coastal Specific Plan have been requested or approved herein. All applicable provisions of the Specific Plan shall be complied with, as further noted in ADM-2020-3521-VSO or any subsequent Venice Sign Off (VSO).
8. **Single Permit Jurisdiction Area.** The project is located within the Single Permit Jurisdiction area of the California Coastal Zone. Prior to the issuance of any permits, the applicant shall provide a copy of the Coastal Commission's Notification that the City's coastal development permit is effective.
9. Outdoor lighting shall be designed and installed with shielding so that light does not overflow into adjacent residential properties.
10. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
11. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
12. Prior to the commencement of site excavation and construction activities a Construction Site Notice shall be posted on the site in a manner, which is readily visible to any interested party.

13. Prior to the issuance of any permits, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the subject case file.

#### **Administrative Conditions**

14. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.
15. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.
16. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.
17. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.
18. **Department of Building and Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.
19. **Condition Compliance.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
20. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review

of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

## **BACKGROUND**

The subject site is a relatively flat, irregular-shaped, residential corner lot with approximately 18 feet of frontage on Beach Avenue, 106 feet of frontage on Mildred Avenue, and abuts 73 feet of Ocean Court at the rear with a total lot area of 4,100.6 square feet. The property fronts Beach Avenue to the northeast, Mildred Avenue to the north, and abuts Ocean Court, an alley. The subject lot is zoned R1-1-O with a General Plan land use designation of Low Residential. The property is located within the Los Angeles Coastal Transportation Corridor Specific Plan Area, Venice Coastal Zone Specific Plan (Southeast Venice Subarea), Transit Priority Area, Calvo Exclusion Area, Urban Agriculture Incentive Zone, Methane Buffer Zone, Tsunami Inundation Zone, Liquefaction Zone, and within 5.49 kilometers of the Santa Monica Fault.

The neighborhood and properties immediately surrounding the property are developed mainly with one and two-story residential structures comprised of single and multi-family dwellings. Properties to the south and the east along Beach Avenue and Mildred Avenue are in the R1-1-O zone comprised of primarily of one- and two-story single- and multi-family dwellings. Properties across Mildred Avenue to the north are zoned RD1.5-1-O comprised primarily of two-story multi-family dwellings. Properties directly to the west across Ocean Court are zoned C1-1-O and RD3-1-O comprised of a neighborhood market and one- to two-story single- and multi-family dwellings. The lots maintain moderate landscaping and vegetation.

The applicant is requesting a Coastal Development Permit and Mello Act Compliance Review for the demolition of a one-story single-family dwelling and detached garage and the construction of a new two-story, 3,008 square-foot single-family dwelling, roof deck, 423 square-foot accessory structure, and swimming pool. The accessory structure is comprised of a 375 square-foot two-car garage and a 48 square-foot pool bathroom. A total of three onsite parking spaces are provided: two spaces in the detached garage and one uncovered space in the rear yard. The lot is currently improved with a 1,080 square-foot one-story single-family dwelling and detached garage constructed in 1962.

Mildred Avenue is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the actual right-of-way width is approximately 50 feet and a roadway width of 28 feet. The street is improved with a curb, gutter, and sidewalk.

Beach Avenue is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the actual right-of-way width is approximately 40 feet and a roadway width of 28 feet. The street is improved with a curb, gutter, and sidewalk.

Ocean Court is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the road is used as an alley with an actual right-of-way and roadway width of 20 feet.

### **Previous zoning related actions in the area include:**

DIR-2019-2467-SPP-MEL – On June 6, 2019, the Director of Planning approved a Specific Plan Project Permit Compliance authorizing the construction of a new two-story (with a loft), 1,122 square-foot second dwelling unit to the rear of an existing one-story, single-family dwelling unit; providing a total of four onsite parking spaces, located at 462 East South Venice Boulevard.

DIR-2017-4217-CDP-MEL – On July 18, 2018, the Director of Planning approved a Coastal Development Permit authorizing the demolition of an existing one-story single-

family dwelling at 2313 Clark Avenue and the remodel and addition to an existing two-story single-family dwelling at 2317 Clark Avenue comprised of a two-story, 1,221 square-foot addition, a new swimming pool, and improvements to an existing detached garage; three parking spaces are provided, located in the Single Permit Jurisdiction of the California Coastal Zone, located at 2313 and 2317 South Clark Avenue.

DIR-2016-583-CDP – On September 22, 2016, the Director of Planning approved a Coastal Development Permit authorizing the remodel and addition to an existing one-story, 728 square-foot, single-family dwelling comprised of an 88 square-foot addition to the ground floor and a new 455 square-foot second story, located in the Dual Permit Jurisdiction of the California Coastal Zone, located at 2312 South Ocean Avenue.

ZA-2015-1118-CDP-ZAA-SPP-MEL – On January 27, 2016, the Zoning Administrator approved a Coastal Development Permit to allow the construction, use, and maintenance of a second dwelling unit, located in the Dual Permit Jurisdiction of the California Coastal Zone, located at 2205 Ocean Avenue.

### Public Hearing

A Hearing Officer (Kevin Fulton) held a Coastal Development Permit public hearing on October 5, 2020 at 11:30 a.m. in conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, the Public Hearing was conducted entirely telephonically. The representative/architect and three members of the public attended the public hearing.

The representative, Bill Tsui (architect), provided a brief overview of the proposed project and requested entitlements. Mr. Tsui noted that the irregular lot is larger than most other lots in the neighborhood. He also noted that he designed the project to be respectful of the character of the neighborhood and that he built the roof deck without a roof access structure to reduce the massing of the dwelling.

The following members of the community provided comments:

Robin Rudisill, a nearby resident, speaking on behalf of Citizens Preserving Venice, spoke in opposition to the proposed project:

- The proposed project will result in cumulative impacts to the neighborhood and a cumulative impact analysis should be required for the project.
- The proposed project is out of scale and character for the neighborhood.
- The proposed dwelling is three times the size of other homes on the block.
- The proposed project must be scaled down or denied.
- The proposed project, if approved, will be appealed to the Area Planning Commission.

Richard Stanger, a neighbor, spoke in opposition to the proposed project:

- The proposed project is out of mass, scale, and character even if it is on an oversized lot.
- The proposed project is on an original canal street where lots are smaller than normal.

Zabi Fazal, an immediate neighbor, asked about the location of the swimming pool and detached garage.

After questioning from the Hearing Officer, Mr. Tsui noted that he had completed a context analysis and that there are multiple two-story homes on Beach Avenue. Mr. Tsui offered to conduct more outreach to the neighborhood and to the Venice Neighborhood Council.



The case was taken under advisement for four weeks to allow for Mr. Tsui to conduct additional outreach to the neighborhood and Venice Neighborhood Council and for additional comments to be submitted.

### Correspondence

Six individuals submitted emails in opposition to the project indicating that the project does not respect the mass, scale, and character of the neighborhood and that it will have a negative cumulative impact.

Two individuals submitted emails indicating they are in full support of the project after reviewing the project's documents.

## FINDINGS

### Coastal Development Permit

In order for a coastal development permit to be granted all of the requisite findings maintained in Section 12.20.2 of the Los Angeles Municipal Code must be made in the affirmative.

1. **The development is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Chapter 3 of the Coastal Act includes provisions that address the impact of development on public services, infrastructure, traffic, the environment and significant resources, and coastal access. Applicable provision are as follows:

*Section 30244 Archaeological and Paleontological Resources.*

*Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.* The project will demolish an existing single-story single-family dwelling and detached garage and construct a two-story single-family dwelling, accessory structure, and swimming pool. The subject site is not located within an area with known Archaeological or Paleontological Resources. However, if such resources are discovered during excavation or grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

*Section 30250 Location; existing developed area.*

*(a) 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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.* The proposed project is located in a residential neighborhood developed with similar single and multi-family dwellings. The corner lot fronts Beach Avenue and Mildred Avenue and abuts Ocean Court in the rear, which provides pedestrian and vehicular access to the site and the project will provide three required onsite parking spaces. The proposed new dwelling and accessory structure will maintain connections and access to all public services; the project will replace an existing residential development. As such, the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources.

*Section 30251 Scenic and Visual Qualities.*

*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.* The subject site and surrounding area are relatively flat with no views to and along the ocean; no natural land forms will be altered as part of the project. The project will demolish an existing

single-story single-family dwelling and detached garage and construct a two-story single-family dwelling, roof deck, accessory structure, and swimming pool and is located within a residential neighborhood developed primarily with one and two-story structures. The subject site is on a corner lot with frontage along Mildred Avenue to the north and Beach Avenue to the east, a rear alley, Ocean Court, provides vehicular access to the lot. The front of the proposed structure will be oriented towards Beach Avenue, providing pedestrian access. There are 23, R1-1-O zoned lots on Beach Avenue between Mildred Avenue to the north and Olive Avenue to the south, excluding the subject site. These lots are developed with single- and multi-family homes, of which 13 are one-story in height and 10 are two-stories in height. Furthermore, the lots across Mildred Avenue to the north are zoned RD1.5-1-O comprised primarily of two-story multi-family dwellings. Properties directly to the west across Ocean Court are zoned C1-1-O and RD3-1-O comprised of a neighborhood market and one- to two-story single- and multi-family dwellings. The proposed development is limited to the property line and will not encroach onto the public right-of-way. The proposed development complies with the density, buffer/setback, yard, and height standards outlined in Policy I.A.3 of the Venice Land Use Plan. As proposed, the new single-family dwelling and accessory structure are visually compatible with the character of the area and will visually enhance the existing neighborhood.

*Section 30252 Maintenance and Enhancement of Public Access.*

*The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.* The project proposes the demolition of a single-family dwelling and detached garage and construction of a new two-story single-family dwelling with an accessory structure. The subject site is located approximately 0.44 miles from the Pacific Ocean shoreline. The project complies with the minimum parking requirements of three onsite parking spaces. No permanent structures would be placed within the public right-of-way and public access to the coast would not be impacted.

*Section 30253 Minimization of Adverse Impacts.*

*New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.* The property is located within a Liquefaction Zone, and within 5.49 kilometers from the Santa Monica Fault. As such, the project is subject to compliance with Zoning, Building, and Fire Safety Code requirements that will minimize risks to life and property in geologic and methane hazard areas. The property is located within Zone X, outside the flood zone.

The project site is also located within an area that may be affected by Sea Level Rise. On August 12, 2015, the Coastal Commission adopted a Sea Level Rise Policy Guidance document, updated and adopted On November 7, 2018. This policy document provides a framework and directions for local jurisdictions to address sea level rise (SLR) in Local Coastal Programs (LCPs) and Coastal Development Permits (CDPs). In May 2018, the City completed an initial sea level rise vulnerability assessment for the Venice Coastal Zone. The report provides that: *Existing wide beaches generally protect Venice from coastal hazards. Coastal assets along or near the beachfront are potentially vulnerable during a large storm event in combination with SLR greater than 3.3 feet. After 4.9 feet SLR, beachfront assets are more vulnerable to damage from flooding or potential erosion of the beach. A SLR of 6.6 feet is a tipping point for Venice's exposure to extreme coastal wave events. Beachfront and coastal assets could flood annually, beaches could be greatly reduced in width, and high water levels could greatly increase potential for flooding of inland low-lying areas.* As discussed in the analysis, there is considerable uncertainty around the timing of SLR, how coastal processes may be affected, and what adaptation approaches will be applied in the future (VSLRVA, pg. 45). Policies and development standards to address the potential impacts of SLR would be addressed in the City's LCP for the Venice Coastal Zone.

The Coastal Storm Modeling System (CoSMoS) was utilized to analyze the project's vulnerability to flood hazards, considering a scenario of a minimum 6.6-foot sea level rise and a 100-year storm scenario. Based on this scenario, the proposed development could potentially be affected by flooding as a result of SLR, however, the potential for such flooding in severe storm events is likely to increase towards the end of the project life (based on a typical development life of 75 years). The proposed project does not include any basement areas. Furthermore, any repair, demolition, and/or new construction as a result of any flooding would be subject to additional review. As conditioned, the proposed development is consistent with Section 30253 of the Coastal Act.

The proposed development would have no adverse impacts on public access, recreation, public views or the marine environment, as the property is located within a developed residential area and located more than 0.44 miles from the Venice Beach shoreline. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filling or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed dwelling will not block any designated public access views. As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

2. **The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Coastal Act Section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act. The Venice Local Coastal Land Use Plan ("LUP") was certified by the California Coastal Commission on June 14, 2001; however, the necessary implementation ordinances were not adopted. The City is in the initial stages of preparing the LCP; prior to its adoption the guidelines contained in the certified LUP are advisory.

As discussed, the project consists of the demolition of a one-story single-family dwelling and detached garage and construction of a two-story single-family dwelling and an

accessory structure. The subject site is zoned R1-1-O with a land use designation of Low Residential.

The following are applicable policies from the Venice Local Coastal Land Use Plan:

Policy I.A.1 identifies general residential development standards regarding roof access structures and lot consolidation restrictions. The project does not propose any lot consolidation or roof access structures.

Policy I.A.3. outlines density and development standards for areas designated for Single-Family Dwelling – Low Density in the Southeast Venice Subarea: restricting density to one unit per 5,000 square feet of lot area and limiting height to 30 feet for buildings utilizing a stepped back or varied roofline. The portion that exceeds 25 feet in height shall be set back from the required front yard one foot for every foot in height above 25 feet. As previously discussed, project consists of the demolition of a single-family dwelling and accessory structure and the construction of a single-family dwelling with an accessory structure, proposing a varied roofline with a maximum height of 28 feet, measured from the centerline of Beach Avenue.

Policy II.A.3. outlines the parking requirements for residential projects: single-family dwelling projects on lots 35 feet or more in width (if adjacent to an alley) are required to provide three parking spaces. The subject property is 43 feet wide and will provide three parking spaces: two spaces in the detached garage and one uncovered space between the accessory building and swimming pool. Vehicular access will continue to be provided from the rear alley, Ocean Court.

The proposed development is consistent with the policies of the Land Use Plan and the standards of the Specific Plan and will not prejudice the ability of the City to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act.

3. **The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination.**

The Los Angeles County Interpretative Guidelines were adopted by the California Coastal Commission (October 14, 1980) to supplement the Statewide Guidelines. Both regional and statewide guidelines, pursuant to Section 30620 (b) of the Coastal Act, are designed to assist local governments, the regional commissions, the commission, and persons subject to the provisions of this chapter in determining how the policies of this division shall be applied to the coastal zone prior to the certification of a local coastal program. As stated in the Regional Interpretative Guidelines, the guidelines are intended to be used “in a flexible manner with consideration for local and regional conditions, individual project parameters and constraints, and individual and cumulative impacts on coastal resources.

The project proposes the demolition of a single-family dwelling and detached garage and construction of a new two-story single-family dwelling and an accessory structure. The Regional Interpretative Guidelines have been reviewed, analyzed, and considered, and the proposed project will be in substantial conformance with the guidelines. In addition to the Regional Interpretative Guidelines, the policies and development standards of the Venice Local Coastal Program Land Use Plan and Venice Coastal Zone Specific Plan have also been reviewed, analyzed, and considered. The proposed project will also be in substantial conformance with the policies and development standards of the Land Use Plan and Specific Plan.



4. **The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.**

The project consists of the demolition of a single-family dwelling and detached garage and construction of a new two-story single-family dwelling and accessory structure; providing three parking spaces. The project is located within the Single Permit Jurisdiction of the California Coastal Zone, where the local jurisdiction (City of Los Angeles) issues Coastal Development Permits. The Coastal Commission will render decisions on appeals of the City's Coastal Development Permits or Coastal Exemptions. The Coastal Commission took action on the following residential projects in the Venice Coastal Zone:

- In August 2018, the Coastal Commission approved a Coastal Development Permit to authorize the demolition of a 1-story, 700 square-foot single-family dwelling, and the construction of a 2-story, 24-foot high, approximately 2,878 square-foot single-family dwelling with an attached 2-car garage and roof deck, on a lot located in a Single Permit Jurisdiction Area of the Coastal Zone at 2412 Clement Avenue, Venice, Los Angeles County (Application No. A-5-VEN-17-0072).
- In June 2018, the Coastal Commission approved a Coastal Development Permit to authorize the demolition of a 756 square-foot single-family home on two adjoining residential lots and construction of an approximately 24-foot high, 1,560 square-foot, 3-level, single family residence with a rooftop deck and attached two-car garage on one 2,011.6 square-foot lot, located in a Single Permit Jurisdiction Area of the Coastal Zone at 678 Marr Street, Venice, Los Angeles County (Application No. A-5-VEN-17-0044).
- In August 2017, the Commission found No Substantial Issue with an appeal of a Coastal Development Permit issued by the City of Los Angeles, upholding the City's approval of a coastal development permit for the demolition of a two-story single-family dwelling and construction of a new two-story, 3,004 square foot single-family dwelling, in the single permit jurisdiction, located at 2318 Clement Avenue (Appeal No. A-5-VEN-15-0036).
- In June 2017, the Commission found no substantial issue with a City approval of a coastal development permit for the demolition of a one-story single-family home and the construction of a two-story, 3,400 square-foot single-family dwelling with an attached two-car garage and roof deck on a lot located at 2325 Wilson Avenue (Application No. A-5-VEN-17-0016).
- In February 2017, the Commission approved a coastal development permit for the demolition of a one-story single-family home and the construction of a two-story, 2,702 square-foot single-family dwelling with an attached two-car garage and rooftop deck on a lot located at 3021 Stanford Ave (Application No. 5-16-0685).
- In February 2017, the Commission approved an Administrative Permit for the substantial demolition and remodel of a one-story single-family dwelling, resulting in a 2,670 square-foot, two-story, 25 feet-in-height, single-family dwelling with a rooftop deck, and a new detached two-story recreation room to the rear of the structure, located at 3024 Stanford Avenue. (Application No. 5-16-0985).

As such, this decision of the permit granting authority has been guided by applicable decisions of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

5. **The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

Section 30210 of the Coastal Act states the following in regards to public access:

*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, right of private property owners, and natural resources from overuse.*

Section 30211 of the Coastal Act states the following in regards to public recreation policies:

*Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

The subject property is located approximately 0.44 miles from the Venice Beach shoreline. Despite the distance to the water, the project could have a cumulative effect on public access to the coast if it resulted in a loss of on-street parking spaces or did not provide adequate parking for the dwelling. The proposed project provides the required three parking spaces onsite accessed from the rear alley, Ocean Court. The sidewalk along Mildred Avenue and Beach Avenue will remain unaffected by the project. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

6. **An appropriate environmental clearance under the California Environmental Quality Act has been granted.**

A Categorical Exemption, ENV-2020-3522-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act and the City CEQA Guidelines. The project proposes the demolition of a one-story single-family dwelling and detached garage and the construction of a new two-story, 3,008 square-foot single-family dwelling, roof deck, 423 square-foot accessory structure, and swimming pool, providing three parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines, Section 15301 (Class 1) and 15303 (Class 3).

The Class 1 Categorical Exemption includes demolition and removal of individual small structures: (1) One single-family residence. In urbanized areas, up to three single-family residences may be demolished under this exemption; (2) A duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished; (3) A store, motel, office, restaurant, or similar small commercial structure if designed for an occupant load of 30 persons or less. In urbanized areas, the exemption also applies to the demolition of

up to three such commercial buildings on sites zoned for such use; (4) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences. The project includes the demolition of a single-family dwelling and detached garage and qualifies for this exemption.

The Class 3 Categorical Exemption allows for construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure; this includes one single-family residence, or a second dwelling unit in a residential zone. The Class 3 categorical exemption further allows for construction of accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences. The project includes the construction of a new single-family dwelling and an accessory structure, comprised of a garage and pool bathroom, and qualifies for this exemption.

Furthermore, the Exceptions outlined in the State CEQA Guidelines Section 15300.2 do not apply to the project:

- (a) Location. The project is not located in a sensitive environment. Although the project is located within the Coastal Zone, the residential neighborhood is not identified as an environmental resource. The proposed project is consistent with the scale and uses proximate to the area. The subject site is not located in a fault or flood zone, nor is it within a landslide area. Although the project is located within a liquefaction area, the project is subject to compliance with the requirements of the Building and Zoning Code that outline standards for residential construction.
- (b) Cumulative Impact. The project is consistent with the type of development permitted for the area zoned R1-1-O and designated Low Residential use. The project will demolish an existing single-family dwelling and detached garage and construct a single-family dwelling and an accessory structure and will not exceed thresholds identified for impacts to the area (i.e. traffic, noise, etc.). The project will not result in significant cumulative impacts.
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. The project proposes a two-story single-family dwelling and accessory structure in an area zoned and designated for such development. The surrounding area is developed with similar single- and multi-family residential uses. The proposed density is consistent with the density permitted by the Venice Specific Plan (R1 density). The proposed height and massing are not unusual for the project vicinity. The proposed project consists of work typical to a residential neighborhood, no unusual circumstances are present or foreseeable.
- (d) Scenic Highways. The project site is not located on or near a designated state scenic highway.
- (e) Hazardous Waste Sites. The project site is not identified as a hazardous waste site or is on any list compiled pursuant to Section 65962.5 of the Government Code.
- (f) Historical Resources. The subject site and existing structures have not been identified as a historic resource or within a historic district (SurveyLA, 2015). The project is not listed on the National or California Register of Historic Places, or identified as a Historic Cultural Monument (HCM).

## **Mello Act Compliance Review**

Pursuant to the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act, all Conversions, Demolitions, and New Housing Developments must be identified in order to determine if any Affordable Residential Units are onsite and must be maintained, and if the project is subject to the Inclusionary Residential Units requirement. Accordingly, pursuant to the settlement agreement between the City of Los Angeles and the Venice Town Council, Inc., the Barton Hill Neighborhood Organization, and Carol Berman concerning implementation of the Mello Act in the Coastal Zone Portions of the City of Los Angeles, the findings are as follows:

### **7. Demolitions and Conversions (Part 4.0).**

The project includes the demolition of an existing single-family dwelling and detached garage located on a 4,100.6 square-foot lot in the Venice Coastal Zone. A Determination issued by the Los Angeles Housing and Community Investment Department (HCIDLA) dated August 20, 2020 states that the property currently consists of a single-family dwelling with a total of three bedrooms. The owner acquired the property on March 31, 2017 and applied with the Department of City Planning on June 27, 2020. HCIDLA collected data from June 2017 through June 2020, utilizing bank statements provided by the current owners. The property was rented to a tenant beginning on July 1, 2017. The bank statements show a consistent rent payment of \$6,500 per month except for the months between May and June 2020. The rent paid is above the Moderate rent level of \$2,126 for a three bedroom unit per Schedule VII with an average monthly rent of \$6,166 during the determinations' three year lookback period. Because \$6,500 and \$6,166 are above Moderate, from June 2017 to June 2020, HCIDLA determined that no affordable units exist at the property. Therefore, no Affordable Existing Residential Units are proposed for demolition or conversion; and the applicant is not required to provide any Affordable Replacement Units.

### **8. Categorical Exemptions (Part 2.4) Small New Housing Developments**

The project proposes the construction of one new Residential Unit. Pursuant to Part 2.4.2 of the Interim Administrative Procedures, developments which consist of nine or fewer Residential Units are Small New Housing Developments and are categorically exempt from the Inclusionary Residential Unit requirement. Therefore, the proposed development of a new Residential Dwelling Unit is found to be categorically exempt from the Inclusionary Residential Unit requirement for New Housing Developments.

## **ADDITIONAL MANDATORY FINDING**

9. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone X, outside the flood zone.

## TIME LIMIT – OBSERVANCE OF CONDITIONS

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. Pursuant to LAMC Section 12.25 A.2, the instant authorization is further conditional upon the privileges being utilized within **three years** after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Constituent Service Center in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either by calling (213) 482-7077, (818) 374-5050, or through the Department of City Planning website at <http://cityplanning.lacity.org>. The applicant is further advised to notify any consultant representing you of this requirement as well.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than \$2,500 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

## TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

## APPEAL PERIOD - EFFECTIVE DATE

The Director's determination in this matter will become effective after **10 working days** unless an appeal therefrom is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of the Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. **Forms are available on-line at <http://cityplanning.lacity.org>.**



Public offices are located at:

Figueroa Plaza  
201 North Figueroa Street,  
4th Floor  
Los Angeles, CA 90012  
(213) 482-7077

Marvin Braude San Fernando Valley  
Constituent Service Center  
6262 Van Nuys Boulevard,  
Room 251  
Van Nuys, CA 91401  
(818) 374-5050

West Los Angeles  
Development Services Center  
1828 Sawtelle Boulevard,  
2nd Floor  
Los Angeles, CA 90025  
(310) 231-2912

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 12.20.2-J of the Los Angeles Municipal Code, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

Provided no appeal has been filed by the above-noted date, a copy of the permit will be sent to the California Coastal Commission. Unless an appeal is filed with the California Coastal Commission before 20 working days have expired from the date the City's determination is deemed received by such Commission, the City's action shall be deemed final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

VINCENT P. BERTONI, AICP  
Director of Planning

Approved by:

Prepared by:

 for  
Faisal Robie, Principal City Planner

  
Juliet Oh, Senior City Planner

VPB:FR:JO:BB



## WEST LOS ANGELES AREA PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

[www.planning.lacity.org](http://www.planning.lacity.org)

### LETTER OF DETERMINATION

Mailing Date: **APR 15 2021**

**CASE NO. DIR-2020-3520-CDP-MEL-1A**

CEQA: ENV-2020-3522-CE

Plan Area: Venice

Council District: 11 - Bonin

**Project Site:** 610 East Mildred Avenue

**Applicant:** Gregory Goldstein and Annette Goldstein  
Representative: Bill Tsui, Yu2e Inc.

**Appellant:** Richard Stanger

At its meeting of **April 7, 2021**, the West Los Angeles Area Planning Commission took the actions below in conjunction with the approval of the following project:

Demolition of one Residential Unit and the construction of one new Residential Unit in the Coastal Zone.

1. **Determined**, based on the whole of the administrative record that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15301, Class 1 and 15303, Class 3, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Denied** the appeal and **sustained** the Director's Determination dated January 7, 2021;
3. **Approved**, pursuant to Section 12.20.2 of the Los Angeles Municipal Code (LAMC), a Coastal Development Permit for the demolition of a one-story single-family dwelling and detached garage and the construction of a new two-story, 3,008 square-foot single-family dwelling, 423 square-foot accessory structure (garage and bathroom), and swimming pool, providing three parking spaces, located in the Single Permit Jurisdiction area of the Coastal Zone;
4. **Approved**, pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, a Mello Act Compliance Review for the demolition of one Residential Unit and the construction of one new Residential Unit in the Coastal Zone;
5. **Adopted** the attached Conditions of Approval; and
6. **Adopted** the attached Findings.

This action was taken by the following vote:

Moved: Newhouse  
Second: Yellin  
Ayes: Laing, Margulies  
Nay: Waltz Morocco

**Vote:** 4 – 1



James K. Williams, Commission Executive Assistant II

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

**Effective Date/Appeals:** The action by the West Los Angeles Area Planning Commission on this matter is final and effective upon the mailing date of this determination and is the final appeal procedure within the appeal structure in the City of Los Angeles.

**California Coastal Commission/Appeals:** Pursuant to Section 12.20.2 I of the Los Angeles Municipal Code, the Area Planning Commission's action shall be deemed final only after 20 working days have expired from the date this decision letter is deemed received by the Executive Officer of the California Coastal Commission and provided that a timely, valid appeal is not taken by the California Coastal Commission within said time frame. The proposed development **is in the single-permit jurisdiction area.** This Coastal Development Permit shall be subject to revocation as provided in Section 12.20.2 J of the Los Angeles Municipal Code.

**Notice:** An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable to a City appellate body** and the decision is final. The applicant is advised that any work undertaken while the CEQA clearance is on appeal is at his/her/its own risk and if the appeal is granted, it may result in (1) voiding and rescission of the CEQA clearance, the Determination, and any permits issued in reliance on the Determination and (2) the use by the City of any and all remedies to return the subject property to the condition it was in prior to issuance of the Determination.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Director's Determination dated January 7, 2021, Interim Appeal Filing Procedures

c: Juliet Oh, Senior City Planner  
Bob Babajian, Student Professional Worker



**CALIFORNIA COASTAL COMMISSION**

SOUTH COAST DISTRICT OFFICE  
301 E. OCEAN BLVD., SUITE 300  
LONG BEACH, CA 90802  
(562) 590-5071  
SOUTHCOAST@COASTAL.CA.GOV

**APPEAL FORM****Appeal of Local Government Coastal Development Permit****Filing Information (STAFF ONLY)**

District Office: South Coast

Appeal Number: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Appellant Name(s): \_\_\_\_\_

**APPELLANTS**

**IMPORTANT.** Before you complete and submit this appeal form to appeal a coastal development permit (CDP) decision of a local government with a certified local coastal program (LCP) to the California Coastal Commission, please review the appeal information sheet. The appeal information sheet describes who is eligible to appeal what types of local government CDP decisions, the proper grounds for appeal, and the procedures for submitting such appeals to the Commission. Appellants are responsible for submitting appeals that conform to the Commission law, including regulations. Appeals that do not conform may not be accepted. If you have any questions about any aspect of the appeal process, please contact staff in the Commission district office with jurisdiction over the area in question (see the Commission's contact page at <https://coastal.ca.gov/contact/#/>).

**Note regarding emailed appeals.** Please note that emailed appeals are accepted **ONLY** at the general email address for the Coastal Commission district office with jurisdiction over the local government in question. For the South Coast district office, the email address is [SouthCoast@coastal.ca.gov](mailto:SouthCoast@coastal.ca.gov). An appeal emailed to some other email address, including a different district's general email address or a staff email address, will be rejected. It is the appellant's responsibility to use the correct email address, and appellants are encouraged to contact Commission staff with any questions. For more information, see the Commission's contact page at <https://coastal.ca.gov/contact/#/>.



**Appeal of local CDP decision**  
**Page 2**

**1. Appellant information<sup>1</sup>**

Name: Richard Stanger

Mailing address: 2409 Clark Avenue, Venice, CA 90291

Phone number: 310-823-0744

Email address: stangerr@ca.rr.com

How did you participate in the local CDP application and decision-making process?

☐ Did not participate    ☐ Submitted comment    ☒ Testified at hearing    ☒ Other

Describe: I, Ingrid Marsten and Luke Lamson appealed to the West  
Los Angeles Area Planning Commission. The appeal was  
denied.

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<sup>1</sup> If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.



**Appeal of local CDP decision**  
**Page 2**

**1. Appellant information<sup>1</sup>**

Name: Ingrid Marston

Mailing address: 2319 Beach Avenue, Venice, CA 90291

Phone number: \_\_\_\_\_

Email address: ingridmarston@gmail.com

How did you participate in the local CDP application and decision-making process?

☐ Did not participate    ☐ Submitted comment    ☐ Testified at hearing    ☒ Other

Describe: I, Richard Stanger and Luke Lamson were appellants to the  
West Los Angeles Area Planning Commission. The appeal  
was denied.

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<sup>1</sup> If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.



**Appeal of local CDP decision**  
**Page 2**

**1. Appellant information<sup>1</sup>**

Name: Warren Adler

Mailing address: 2334 Beach Avenue, Venice, CA 90291

Phone number: \_\_\_\_\_

Email address: warren.adler13@gmail.com

How did you participate in the local CDP application and decision-making process?

☒ Did not participate    ☐ Submitted comment    ☐ Testified at hearing    ☐ Other

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: I wanted to be an appellant before the WLAAPC, but I missed

the deadline. I have kept informed on the case and asked to be

an appellant before the Coastal Commission.

\_\_\_\_\_

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<sup>1</sup> If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.



**Appeal of local CDP decision**  
**Page 2**

**1. Appellant information<sup>1</sup>**

Name: Citizens Preserving Venice, Sue Kaplan, Chair

Mailing address: 763 Nowita Place, Venice, CA 90291

Phone number: 310-621-4427

Email address: sueakaplan@gmail.com

How did you participate in the local CDP application and decision-making process?

☐ Did not participate    ☒ Submitted comment    ☐ Testified at hearing    ☒ Other

Describe: Citizen Preserving Venice has followed this project and its  
WLAAPC appeal. I submitted comments to the WLAAPC  
opposing this project. Because of the importance of the  
issues involved CPV wants to be a co-appellant.

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

<sup>1</sup> If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.



**Appeal of local CDP decision**  
**Page 3**

**2. Local CDP decision being appealed<sup>2</sup>**

Local government name: Los Angeles  
Local government approval body: WLAAPC  
Local government CDP application number: DIR- 2020-3520-CDP-MEL-1A  
Local government CDP decision: ☒ CDP approval ☐ CDP denial<sup>3</sup>  
Date of local government CDP decision: April 15, 2021

Please identify the location and description of the development that was approved or denied by the local government.

Describe: 610 Mildred Avenue, Venice, CA 90291  
The demolition of a one-story single-family dwelling and  
detached garage and the construction of a new two-story,  
3,008 square foot single-family dwelling, 423 square foot  
accessory structure (garage and bathroom) and swimming pool,  
providing three parking spaces.

<sup>2</sup> Attach additional sheets as necessary to fully describe the local government CDP decision, including a description of the development that was the subject of the CDP application and decision.  
<sup>3</sup> Very few local CDP denials are appealable, and those that are also require submittal of an appeal fee. Please see the [appeal information sheet](#) for more information.



**Appeal of local CDP decision**  
**Page 4**

**3. Identification of interested persons**

On a separate page, please provide the names and contact information (i.e., mailing and email addresses) of all persons whom you know to be interested in the local CDP decision and/or the approved or denied development (e.g., the applicant, other persons who participated in the local CDP application and decision making process, etc.), and check this box to acknowledge that you have done so.

☒ Interested persons identified and provided on a separate attached sheet

**4. Grounds for this appeal<sup>4</sup>**

For appeals of a CDP approval, grounds for appeal are limited to allegations that the approved development does not conform to the LCP or to Coastal Act public access provisions. For appeals of a CDP denial, grounds for appeal are limited to allegations that the development conforms to the LCP and to Coastal Act public access provisions. Please clearly identify the ways in which the development meets or doesn't meet, as applicable, the LCP and Coastal Act provisions, with citations to specific provisions as much as possible. Appellants are encouraged to be concise, and to arrange their appeals by topic area and by individual policies.

Describe: See attached Reasons for Appeal.

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<sup>4</sup> Attach additional sheets as necessary to fully describe the grounds for appeal.

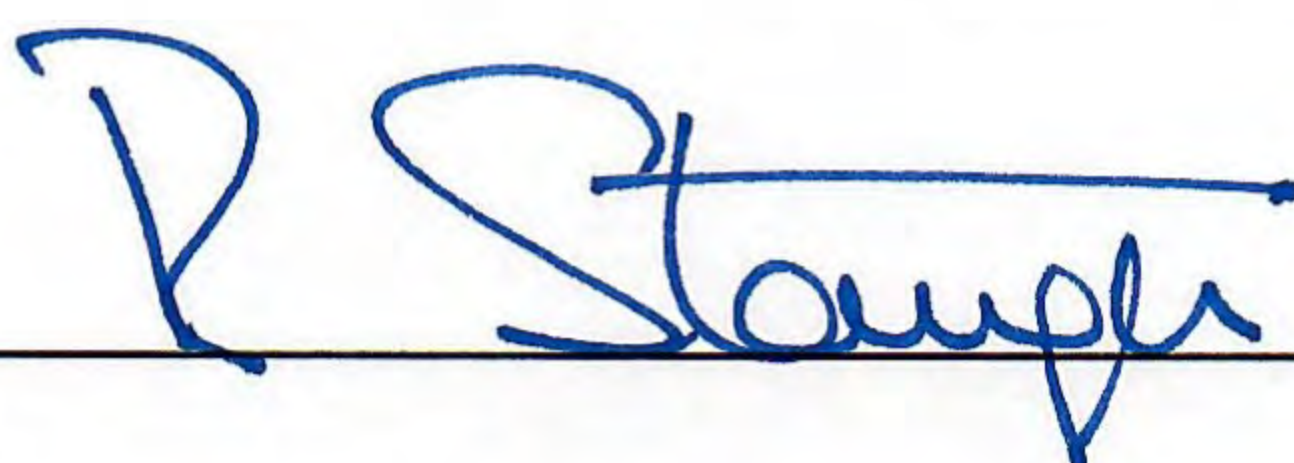


**Appeal of local CDP decision**  
**Page 5**

**5. Appellant certifications<sup>5</sup>**

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Richard Stanger

  
Signature

Date of Signature 5/26/2021

**5. Representative authorizations<sup>6</sup>**

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

☒ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

<sup>5</sup> If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

<sup>6</sup> If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.

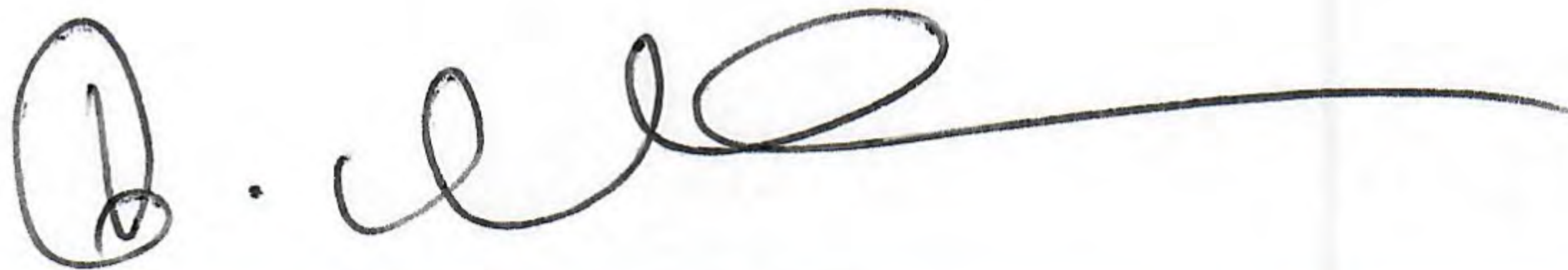


**Appeal of local CDP decision**  
**Page 5**

**5. Appellant certification<sup>5</sup>**

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Ingrid Marston



Signature

Date of Signature 5/26/2021

**5. Representative authorization<sup>6</sup>**

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

☐ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

<sup>5</sup> If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

<sup>6</sup> If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.



## Appeal of local CDP decision

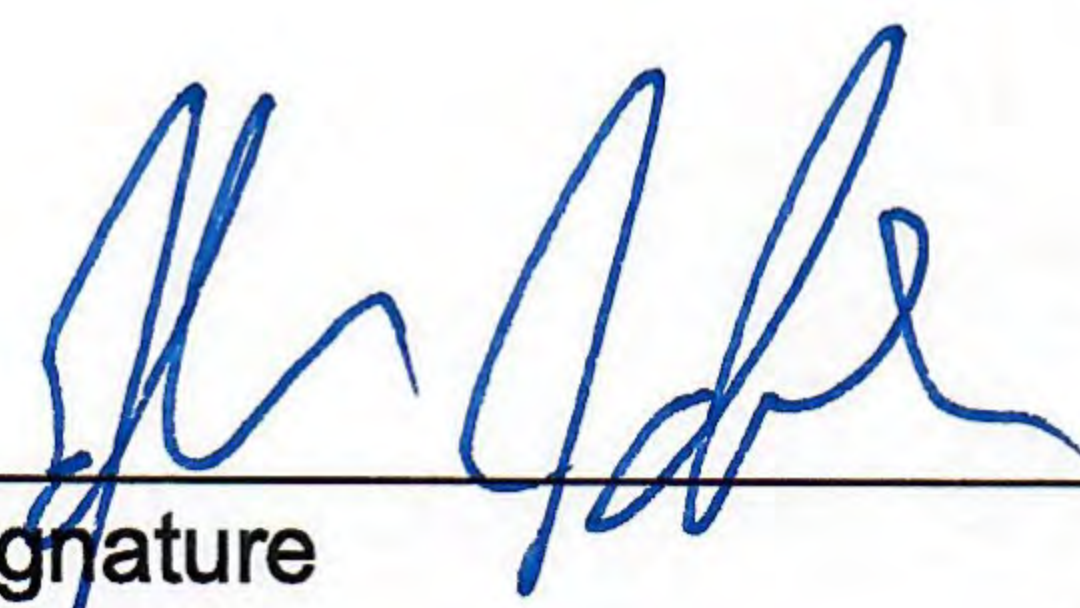
Page 5

### 5. Appellant certification<sup>5</sup>

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Warren Adler

Signature



Date of Signature

5/26/21

### 5. Representative authorization<sup>6</sup>

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

☐ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

<sup>5</sup> If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

<sup>6</sup> If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.



**Appeal of local CDP decision**  
**Page 5**

**5. Appellant certification<sup>5</sup>**

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Sue Kaplan, Chair, Citizens Preserving Venice

Sue Kaplan  
Signature

Date of Signature 26 May 2021

**5. Representative authorization<sup>6</sup>**

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

☐ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

<sup>5</sup> If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

<sup>6</sup> If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.



**CALIFORNIA COASTAL COMMISSION**

45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE (415) 904-5200  
FAX (415) 904-5400

**DISCLOSURE OF REPRESENTATIVES**

If you intend to have anyone communicate on your behalf to the California Coastal Commission, individual Commissioners, and/or Commission staff regarding your coastal development permit (CDP) application (including if your project has been appealed to the Commission from a local government decision) or your appeal, then you are required to identify the name and contact information for all such persons prior to any such communication occurring (see Public Resources Code, Section 30319). The law provides that failure to comply with this disclosure requirement prior to the time that a communication occurs is a misdemeanor that is punishable by a fine or imprisonment and may lead to denial of an application or rejection of an appeal.

To meet this important disclosure requirement, please list below all representatives who will communicate on your behalf or on the behalf of your business and submit the list to the appropriate Commission office. This list could include a wide variety of people such as attorneys, architects, biologists, engineers, etc. If you identify more than one such representative, please identify a lead representative for ease of coordination and communication. You must submit an updated list anytime your list of representatives changes. You must submit the disclosure list before any communication by your representative to the Commission or staff occurs.

Your Name Richard Stanger

CDP Application or Appeal Number DIR-2020-3520-CDP-MEL-1A

**Lead Representative**

Name Richard Stanger

Title \_\_\_\_\_

Street Address. 2409 Clark Avenue

City Venice

State, Zip 90291

Email Address stangerr@ca.rr.com

Daytime Phone 310-823-0744

Your Signature \_\_\_\_\_

Date of Signature \_\_\_\_\_

*R. Stanger*  
*5/26/21*



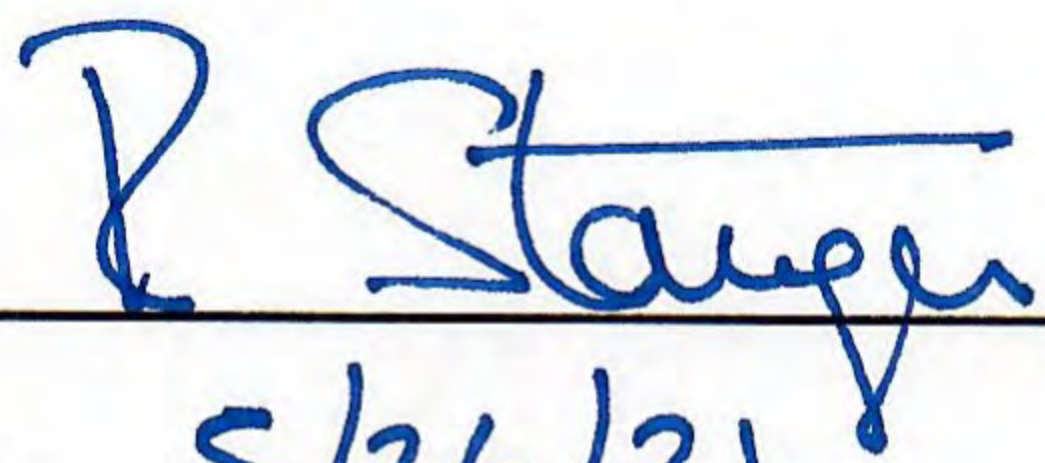
Additional Representatives (as necessary)

Name Robin Rudisill  
Title \_\_\_\_\_  
Street Address. 3003 Ocean Front Walk  
City Venice  
State, Zip CA 90291  
Email Address wilrud@mac.com  
Daytime Phone 310-721-2343

Name Sabrina Venskus  
Title Attorney  
Street Address. 603 West Ojai Avenue  
City Ojai  
State, Zip CA 93023  
Email Address svensk@lawsv.com  
Daytime Phone 805-272-8628

Name Mary Jack  
Title Secretary and Boardmember, Citizens Preserving Venice  
Street Address. 913 Marco Place  
City venice  
State, Zip CA 90291  
Email Address maryjackis@yahoo.com  
Daytime Phone 310-849-9939

Name \_\_\_\_\_  
Title \_\_\_\_\_  
Street Address. \_\_\_\_\_  
City \_\_\_\_\_  
State, Zip \_\_\_\_\_  
Email Address \_\_\_\_\_  
Daytime Phone \_\_\_\_\_

Your Signature   
Date of Signature 5/26/21



**Identification of Interested Persons:****Applicant:**

Gregory Goldstein and Annette Goldstein

We have no contact information for Applicant.

**Applicant's Architect:**

Bill Tsui, Architect

Yu2e Inc.

3411 Caroline Avenue

Culver City, CA 90232

424-603-4791

bil2e@yu2e.com

**City Planning:**

Bob Babajian, Student

Professional Worker

Los Angeles City Planning Department

200 N. Spring Street, Rm 721

Los Angeles, CA 90042

[bYu2eob.babajian@lacity.org](mailto:bYu2eob.babajian@lacity.org)

**Others:**

Robin Rudisill

3003 Ocean Front Walk

Venice, CA. 90291

[wilrudi@mac.com](mailto:wilrudi@mac.com)

310-721-2343

Luke Lamson

2309 Beach Avenue

Venice, CA 90291

[luke.lamson@gmail.com](mailto:luke.lamson@gmail.com)

Richard Stanger  
2409 Clark Avenue  
Venice, CA 90291

May 26, 2021

California Coastal Commission  
Shannon Vaughn, Coastal Program Manager  
301 E. Ocean Boulevard, Suite 300  
Long Beach, CA 90802

Re: Reasons for Appeal  
DIR-2020-3520-CDP-MEL-1A ("**Project**")  
**610 Mildred Avenue ("Property")**

Honorable Commissioners:

This appeal is being filed for the following reasons:

1. The Project is not in conformance with Chapter 3 of the California Coastal Act, specifically Sections 30250(a), 30251 and 30253(e).
2. The Project fails to meet the neighborhood protection policies of the 2001 Venice Land Use Plan by ignoring Policies I.A.2 (Preserve Stable Single-Family Neighborhoods), I.E.1 (General), I.E.2 (Scale), I.E.3 (Architecture).
3. The Project will prejudice the ability of the City of Los Angeles to prepare a local coastal program in conformity with Chapter 3 of the California Coastal Act.
4. The Project will have a negative cumulative effect on the character and scale of its immediate neighbors and on the larger Silver Triangle neighborhood.
5. **The analysis of the Project in the Director's Determination ("Determination") is substantially flawed, misrepresenting the area, using prior irrelevant zoning decisions, selectively choosing policies in the Venice Land Use Plan (LUP), and ignoring relevant recent judicial rulings.**

We are requesting a staff recommendation of Substantial Issue. A Commission decision finding No Substantial Issue would wrongly convey to the City that complying only with the ministerial development standards of density, height, and parking while completely ignoring all policies **intended to "ensure", "protect", and "maintain" a neighborhood's mass, scale, and character** satisfies the approval requirements of the certified Venice Land Use Plan and Chapter 3 of the California Coastal Act.

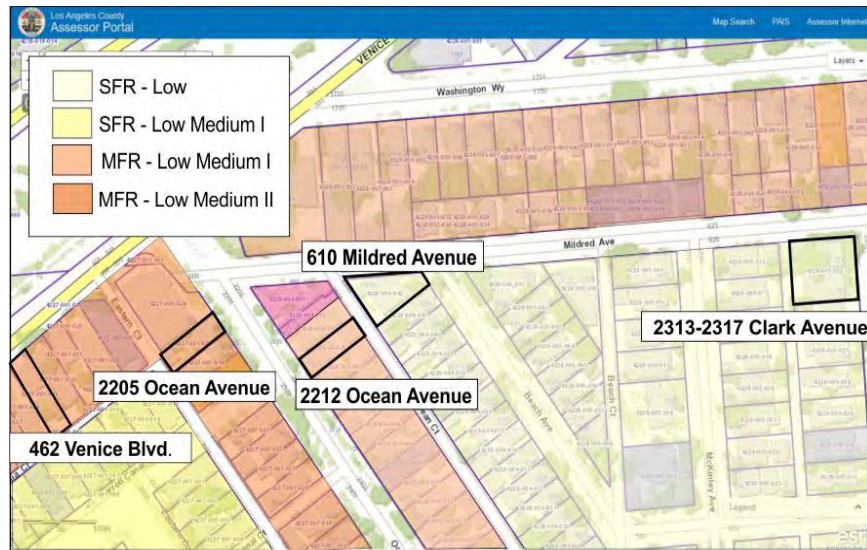
#### A. BACKGROUND:

610 Mildred Avenue fronts Beach Avenue, developed in the 1920s and **one of the original "canal era" streets of Venice**. Beach Avenue is part of the Silver Triangle neighborhood and like it is zoned Single Family Residential-Low. All parcels along the north side of Mildred Avenue, however, are zoned Multi Family Residential-Low Medium II. Three are the 1-story garages of homes along the next street over on Washington Way, and four are 2-story homes along Mildred Avenue each (at 2,100 SF) far less than the size of the proposed project. The 2-story building directly across **Ocean Court is zoned "Neighborhood Commercial"**. (See Map 1, below.)

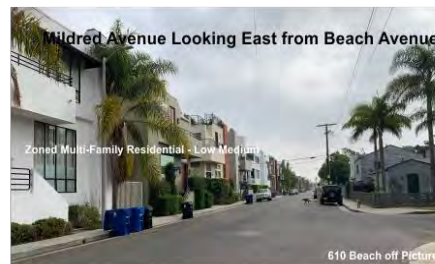
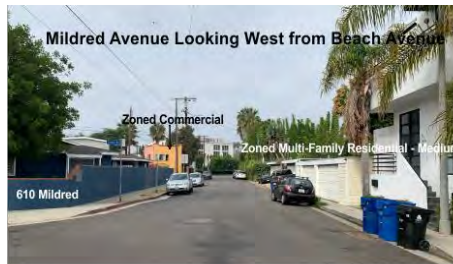


Views from the Mildred and Beach Avenue Intersection are shown in the four photos below. Although the Determination notes the different zoning classification of some of **the Project's** neighboring parcels, it includes them in its analysis of compatibility. For example, its list of four **"Previous zoning related actions in this area"** includes three that are zoned MFR-Low Medium. See chart below for their location and zoning. The other **"relevant action"** is the approval of a 1,221 SF addition (40% the size of the Project) at 2313-2317 Clark Avenue on a 3,600 SF lot purchased by the adjacent owner. None of these examples are relevant zoning actions.

# MAP 1: LOCATION OF PROJECT AND **LOCATION OF "RELEVANT ACTIONS"**



## VIEWS FROM OF BEACH & MILDRED I NTERSECTION TAKEN SEPTEMBER 21, 2020

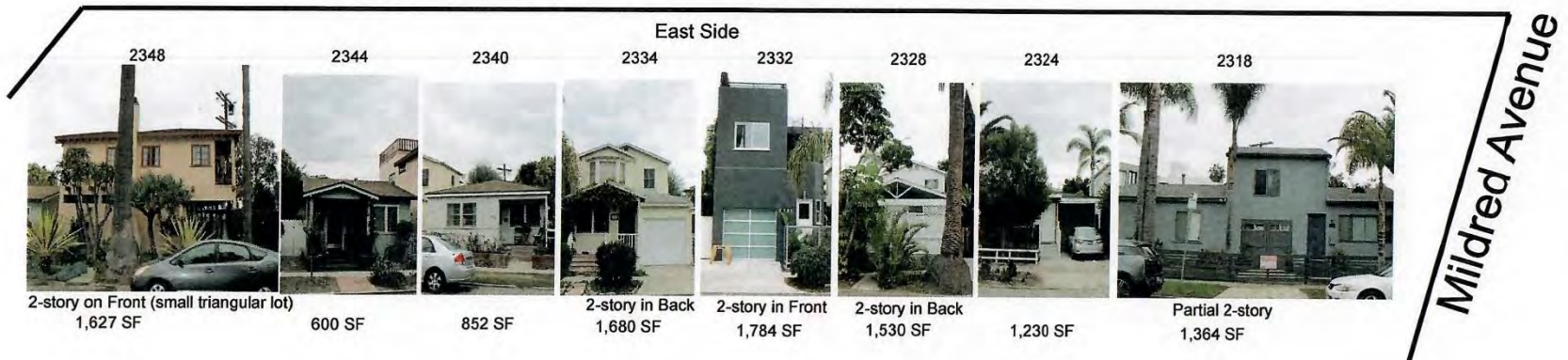


## Streetscape of 2300 Block of Beach Avenue

(Photos vary slightly in scale)



## Beach Avenue





The Silver Triangle neighborhood is one of two areas in Venice zoned Single Family Residential-Low and is unlike any other neighborhood in Venice. It is composed of 258 parcels 96% of which are at or below 3,600 SF. When the California Coastal Plan was published in 1975, all 258 homes were modest, architecturally similar, single-story structures averaging less than 1,100 SF. By 2001, when the Venice Land Use Plan was certified, homes sizes averaged 1,200 SF as about 10% of homes had added partial or full second floors. Only 10 of these were above 2,100 SF (representing a FAR of 0.6).<sup>1</sup> By 2021 54 homes were over 2,100 SF, most approved between 2001 and 2016 when de minimis waivers and Coastal Exemptions were granted without public notice/awareness.

## B. ERRORS IN FINDINGS:

1. In this finding, **the Determination improperly evaluates the Project's conformance** with Chapter 3 of the California Coastal Act.

*Section 30250 of the Coastal Act requires new development to "be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate" and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. Sections 30251 and 30253 of the Coastal Act state that scenic areas and special communities shall be protected. These sections of the Coastal Act require permitted development to be visually compatible with the character of surrounding areas and require protection of communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses. The Venice community, including the beach, the boardwalk, the canals, and the eclectic architectural styles of the neighborhoods – is one of the most popular visitor destinations in California. According to the Venice Chamber of Commerce, 15 million people visited Venice in 2015, drawn by the unique characteristics of the area.<sup>2</sup>*

a. **The City's** findings for Coastal Act Section 30250 of the Coastal Act note only that the Project is "located in a residential neighborhood with similar single- and multi-family dwellings", "will provide three required on-site parking spaces", and "will not have a significant adverse impact on coastal resources". (Note: There are no multi-family dwellings on either Beach or Mildred Avenues, nor in the larger Silver Triangle neighborhood.) **The City's** brief discussion fails to understand that what Coastal Act Section 30250 is referring to is the Special Coastal Community of Venice itself. It **is composed of numerous unique neighborhoods including the Project's** neighborhood.

b. **The City's** findings for Coastal Act Section 30251 note that the Project "complies with the density, buffer/setback, yard and height standards outlined in Policy I.A.3 of the Venice Land Use Plan." The Determination describes the surroundings of the Project, ignoring the underlying zoning classifications, and states that there are 2-story structures nearby so that the Project is compatible. Its findings on visual compatibility is without any factual basis. The discussion completely ignores the facts presented by appellants that the Project is three times the mass of

<sup>1</sup> Use of FARs in the Los Angeles Coastal Zone is prohibited by the City's 2017 Baseline Mansionization Ordinance which excludes the Coastal Zone from Mansionization protections afforded every other SFR neighborhood in the City.

<sup>2</sup> A-5-VEN-20-0054 (HJG CA LLC) - 717 E. California Avenue & 670 E. Santa Clara Avenue, 09/08/2020: <https://documents.coastal.ca.gov/reports/2020/11/W14a/W14a-11-2020-report.pdf>, pages 8-9.

the average house on Beach Avenue and far larger than any of the two-story homes in its vicinity regardless of zoning classification. In short, the Determination reduces the intent of Section 30251 to simply one of meeting density, buffer/setback, yard and height development standards and not the policies of the Coastal Act and certified Venice Land Use Plan.

c. In its evaluation of Section 30253(e) the City is completely silent, yet discusses each of the other four elements, a-d, of Section 30253, especially the **Project site's potential for** future flooding, none of which are particularly relevant to the matter at hand.

There are seven relevant policies in the certified Venice Land Use Plan. They are (emphases added):

#### MINISTERIAL/DEVELOPMENT STANDARDS:

- Policy I.A.1: "The maximum densities, building heights and bulks for residential development in the Venice Coastal Zone shall be defined by the Land Use Plan Maps and Height Exhibits, and the corresponding land use categories and the development standards as described in this LUP..
  - a. Roof Access Structures. Building heights and bulks shall be controlled to preserve the nature and character of existing residential neighborhoods."
- Policy I. A. 3: "Single-Family Dwelling - Low Density. Accommodate the development of single-family dwelling units in areas designated as "**Single-family Residential**" and "**Low Density**" on the Venice Coastal Land Use Plan. Such development shall comply with the density and development standards set forth in this LUP.

Southeast Venice and the Oxford Triangle

Use: Single-family dwelling / one unit per lot

Density: One unit per 5,000 square feet of lot area

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 a varied or stepped back roof line."

- Policy II. A. 3. Parking Requirements. [In this case] Single-family dwelling on lots of 40 feet or more in width, or 35 feet or more in width if adjacent to an alley - 3 spaces

#### DISCRETIONARY POLICIES:

- Policy I. A. 2. "Preserve Stable Single-Family Residential Neighborhoods. 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."



- "Policy I. E. 1. General. 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."<sup>3</sup>
- Policy I. E. 2. Scale. "New development within the Venice Coastal Zone shall respect the scale and character of 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."
- Policy I. E. 3. "Architecture. Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing."

The City chose to use only the three policies that the Project meets: Policy I.A.1 on roof access structure, Policy I.A.3 on density and building height, and Policy II.A.3 on parking. Policy I.A.1 specifically describes the height limit as a "maximum" **limit**. The City continues falsely to assume that assuring a project does **not exceed this height "standard" is enough to protect community** character. In other words, the City falsely believes that **any project at the "maximum" limit** is compatible with the large majority of dwellings far below that limit.

Apparently, the **Director's Determination's** position is that conformance with the certified Venice **Land Use Plan boils down to a Project's** conformance with only the development standard requirements of density, height, and parking. Upon this erroneous conclusion the Determination reaches the completely unreasonable and unsupported **conclusion that "the new single-family dwelling and accessory structure are visually compatible with the character of the area and will visually enhance the existing neighborhood."**

Again, a Commission decision finding No Substantial Issue would wrongly convey to the City that complying only with the ministerial development standards of density, height, and parking while completely **ignoring all policies intended to "ensure", "protect", and "maintain" a neighborhood's** mass, scale, and character satisfies the approval requirements of the certified Venice Land Use Plan and Chapter 3 of the California Coastal Act.

2. **The Director's** Determination incorrectly concludes that the Project will not prejudice the ability of the City of Los Angeles to prepare a local coastal program (LCP) in conformity with Chapter 3 of the California Coastal Act.

<sup>3</sup> The 1975 Coastal Plan defined architectural diversity not as mixing styles within a neighborhood, but enhancing the architectural characteristics that give each neighborhood its character. *"Development shall (1) strengthen the physical form of the community or neighborhood, (2) enhance and restore visual qualities by being of a bulk, height, and color that is compatible with the existing character, (3) harmonize with the essential design characteristics that distinguish the place from other communities (e.g., a rustic weathered or whitewashed appearance of the waterfront),..."*, Page 78.

To show that the approval of the Project will not prejudice its ability to prepare a local coastal program that is in conformity with the California Coastal Act, the City again lists only three LUP policies related to ministerial development standards: Policy 1.A.1 (Roof Access Structure), Policy 1.A.3 (Density and Height), and Policy II.A.3 (Parking). The Determination erroneously states that **with these three policies being met, the City's ability to prepare an unprejudiced LCP is protected**. As shown in Section 1 above, the Determination completely ignores the LUP's four policies related to protection of Venice as a special coastal community and compatibility of a project with mass, scale, and character of the neighborhood: I.A.2, I.E.1., I.E.2., and I.E.3.

A Commission finding of No Substantial Issue will convey to the City that approval of a project in the Single-Family Residential-Low neighborhoods of Venice that completely ignores policies to **"ensure", "protect", and "maintain" a neighborhood's** mass, scale, and character and meets only development standard limits on density, height, and parking will not prejudice its ability to complete its Local Coastal Program, the purpose of which is to protect the Special Coastal Community of Venice. Chart 4, attached, evaluates the logical extension of such an erroneous position on the larger neighborhood.

It took the City 25 years after the Coastal Act to prepare the Venice LUP. Another twenty years have passed and the City continues to work on the required Venice Local Coastal Program (LCP). **It is anybody's guess when the LCP will finally be adopted. In the meantime the City continues to approve projects that are cumulatively adversely changing the mass, scale, and character of Venice's neighborhoods, for which the LUP requires protection. The on-going approval of very large, incompatible buildings in the Silver Triangle IS changing its character, thereby violating the "ensure", "protect" and "maintain" policies of the LUP. And the on-going change will certainly affect the City's view of the neighborhood and therefore its preparation of the LCP.**

3. In this finding the Determination misstates that it has followed the Interpretive Guidelines for Coastal Planning and Permits and is in substantial conformance with the Venice Land Use Plan.

While the Guidelines and LUP are advisory, what the Determination does is to cherry-pick the guidelines and policies in approving the Project. Those that it addresses fall far short of what are required to **evaluate the Project's compatibility and the adverse effects of the project's** approval. It completely ignores all policies that deal with the real LUP-based issues raised by appellants: **neighborhood character, the Project's excessive mass and scale, and the Project's significant negative cumulative effect on the character of the neighborhood.**

Being advisory does not allow City Planning to arbitrarily exclude required, relevant policies.

4. In this finding the Determination wrongly states it has been guided by applicable decisions of the California Coastal Commission.

Attempting to support its position, the City lists five decisions that it believes are relevant. Two of them, on Stanford Street, are almost a mile away and two blocks from Lincoln Boulevard in a different neighborhood on a street with notable differences from Beach Avenue and the Silver Triangle. Another decision the City uses to justify its position, located on 676 & 678 Marr Street, was approved by the Commission only after its staff found the original design was incompatible with the mass, scale, and character of its neighbors. In the De Novo process the applicant made

very substantial changes to reduce the mass and scale of the project. It is a decision that supports appellant's position.

The prior decisions' findings listed for 2412 Clement Avenue and 2325 Wilson Avenue support **appellant's position as well. These were Coastal Commission approvals that were** litigated. In both cases, separate Superior Court judges found that the Commission failed to evaluate the cumulative effects of these projects as is required by the California Coastal Act. On remand from the Court the Coastal Commission staff acknowledged the ruling and prepared a cumulative effects analysis for 2325 Wilson Avenue for a De Novo hearing. The finding fails to note this critical point. Nor does the City explain why it has not been guided by the legal opinions nor by the precedent of the Commission's **actions** by which it is supposedly guided. The Commission has since reinforced the need to perform a cumulative effects assessment as demonstrated in recent decisions.

The City must by law prepare cumulative effects analyses for proposed projects in the Venice Coastal Zone, and the Coastal Commission provides precedent of doing so in prior decisions that the City must use as guidance. See attached letter by Robin Rudisill sent to the West Los Angeles Area Planning Commission during its review of this project that provides evidence with excerpts from recent judicial orders and references to prior coastal staff reports.

#### C. CUMULATIVE EFFECTS ANALYSIS:

In 2020, the Superior Court found, for two separate projects in the Silver Triangle neighborhood, that a cumulative effects analysis is required by the Coastal Act of 1976 in making a CDP determination. (See Section B.4., above.)

In fact, City Planning has never done a cumulative effects analysis for any project in the Silver Triangle. Had it, such analysis would show that the neighborhood character that the 2001 Venice LUP was supposed to protect has been and continues to be cumulatively harmed by **the City's** approval of massive projects that are grossly incompatible with the character and scale of the 2001 neighborhood.

##### 1. Potential Adverse Effect of Streetscape:

One **usual way of measuring a project's compatibility with its neighborhood** is to analyze the **homes along its "streetscape/blockscape"**. However, **Coastal Commission staff have used various** definitions of the survey area over the past several years. Its Staff Reports on previous appeals have three times used a two-block definition (2412 Clement Avenue, 2416 Frey Avenue, and 2433 Wilson Avenue), a one-block streetscape (2334 Frey Avenue), a one-block streetscape supplemented with a list of projects throughout the Silver Triangle (2318 Clement Avenue), and a 6-property list of homes none of which were on the subject block (2325 Wilson Avenue), changed for the De Novo hearing to a six-block area that includes homes on the other side of a 1,000 foot long block wall that are in no way part of the 2325 Wilson block, streetscape or neighborhood. For the underlying project, the evaluation reverts to the standard one-block streetscape on this block of homes initially developed in the early 1920s.

Chart 1 arrays the homes on Beach Avenue by residential floor area in 2001. At 3,008 SF, the proposed project is almost three times the average size of the homes on the block (1,114 SF), and is 70% larger than the next largest home. The Project does not begin to conform to the

mass, scale, and character of its streetscape. Its larger lot size does not exempt it from meeting the mass, scale, and character of the neighbor buildings, nor does the Determination make the lot size a justification for its larger size.

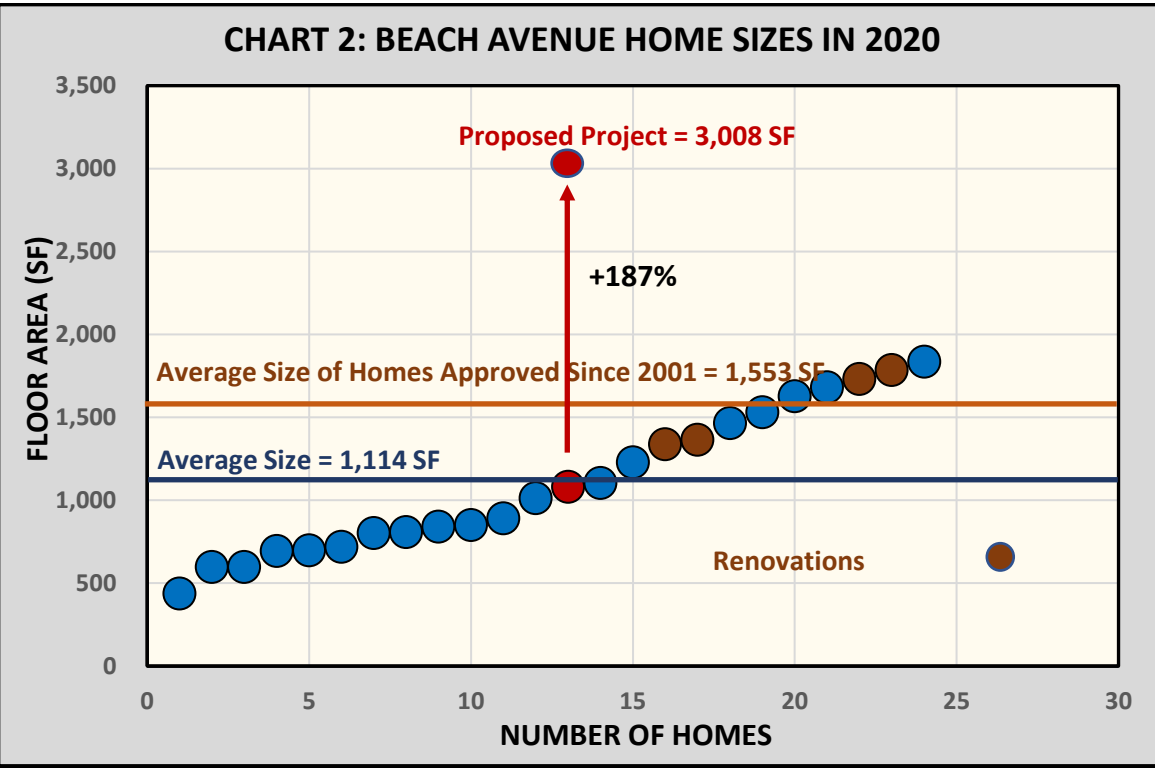
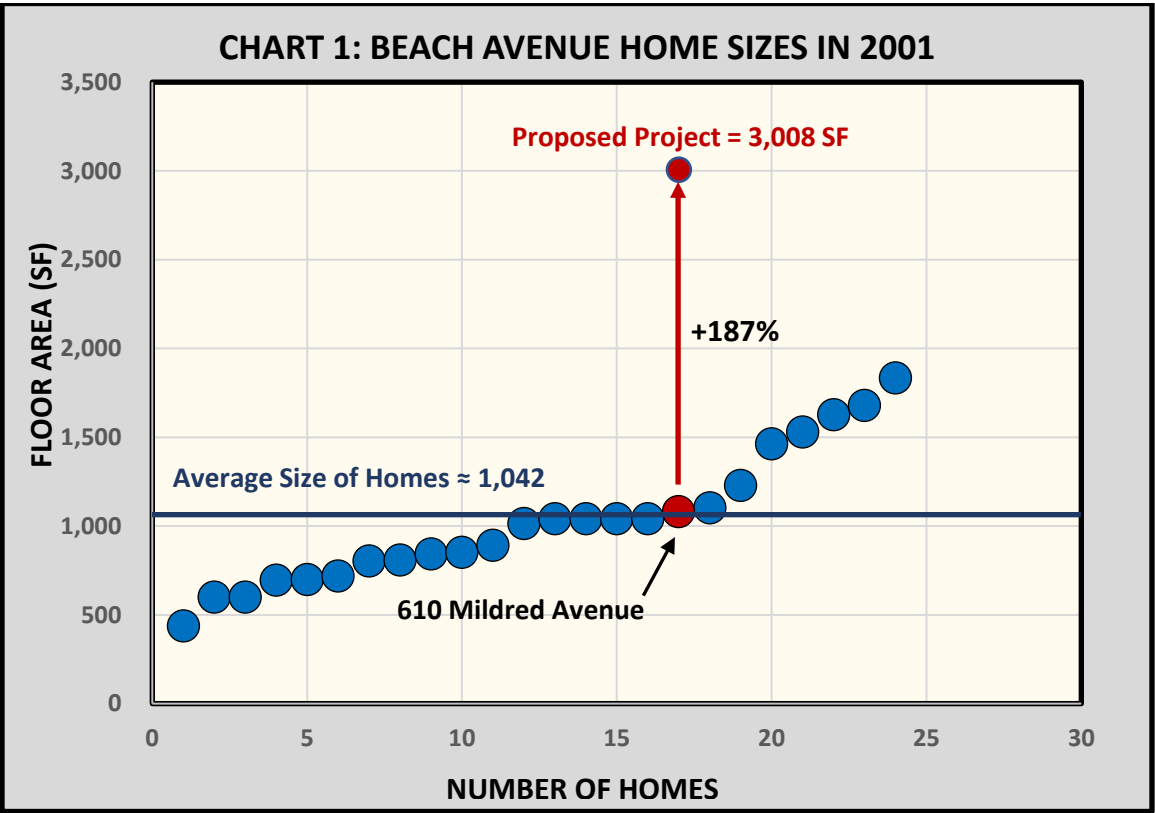


Chart 2 arrays the homes on Beach Avenue now. The City has approved four major renovations since 2001 averaging 1,553 SF, with the largest 1,784 SF, **which the Project's size exceeds by 70%**. Clearly the Project does not fit into the mass, scale or character of the existing homes on its streetscape. The approval of this project will have an adverse cumulative effect on Beach Avenue because it essentially says that even a home that is almost three times larger than the average size and 70% larger than the current largest home on the block is compatible with the mass, **scale, and character of this "canal era" street.**

## 2. Potential Adverse Effect on Larger Neighborhood:

The decision to look at the impact of the Project on the larger neighborhood is logical given the homogeneous character of the 2001 Silver Triangle (see top of Page 4 for further explanation). Slicing-and-dicing the Silver Triangle to include large homes that can justify a given Project ultimately hurts the entire neighborhood because that now-approved project will then be sliced-and-diced into another such evaluation.

Will the approval of this project have an adverse cumulative effect on the larger Silver Triangle neighborhood? Chart 3 arrays all 258 properties in the Silver Triangle neighborhood by their size in 2001.<sup>4</sup> The average size of homes was 1,200 SF. Chart 4 shows the distribution of home sizes in 2020. The circles in blue are existing homes built prior to the 2001 LUP. Homes approved and built after 2001, the green circles, are clearly far larger. New homes approved are 3, 4, even 5 times larger than the homes they replaced. The average size of homes approved in the Silver Triangle since 2001 is 2,586 SF, well over twice as large as was the average when the LUP was certified. The overall average is steadily getting larger as proposed new homes are now almost always built to the development standard limits.<sup>5</sup>

The Determination states that **justification of this Project's CDP** can be found in part from three previous Commission approvals on similarly-sized homes at 2318 Clement, 2412 Clement, and 2325 Wilson Avenues. These are three of the largest homes in the Silver Triangle. There is no discussion of the 70% of homes in the neighborhood that are still one-story homes or that they average almost a third the mass of the proposed project. As these recently-approved projects are used to justify the 610 Mildred Avenue project, the CDP approved for this Project will assuredly be used to justify the next oversized project.<sup>6</sup> This is exactly why the cumulative effects sections of the California Coastal Act exist: to protect special coastal communities from the cumulative effects of domino CDP approvals of out-of-character projects, the last one always justifying the next one.

<sup>4</sup> All residential floor areas of existing homes in this appeal are from the Los Angeles County **Assessor's website. For those homes rebuilt after 2001, their 2001 size is either the known size prior to renovation or the average of home sizes on the block (single-and two-story both) not renovated.** Thus the average size of homes in 2001 is likely larger than was actually the case.

<sup>5</sup> Commission staff have opined to the Commission that the average new home in the United States is now over 2,600 SF **so that this size home in the Silver Triangle is "typical".** What staff does not say is that these 2,600 SF new homes are on average lot sizes of 9,000 SF, 2 to 3 times larger than the Silver Triangle lot sizes.

<sup>6</sup> For example, 2325 Wilson Avenue, to be the third largest structure in the entire 258-home neighborhood, was approved by the Commission in September 2020 and does not yet even exist.

**CHART 3: DISTRIBUTION OF HOME SIZES IN 2001**

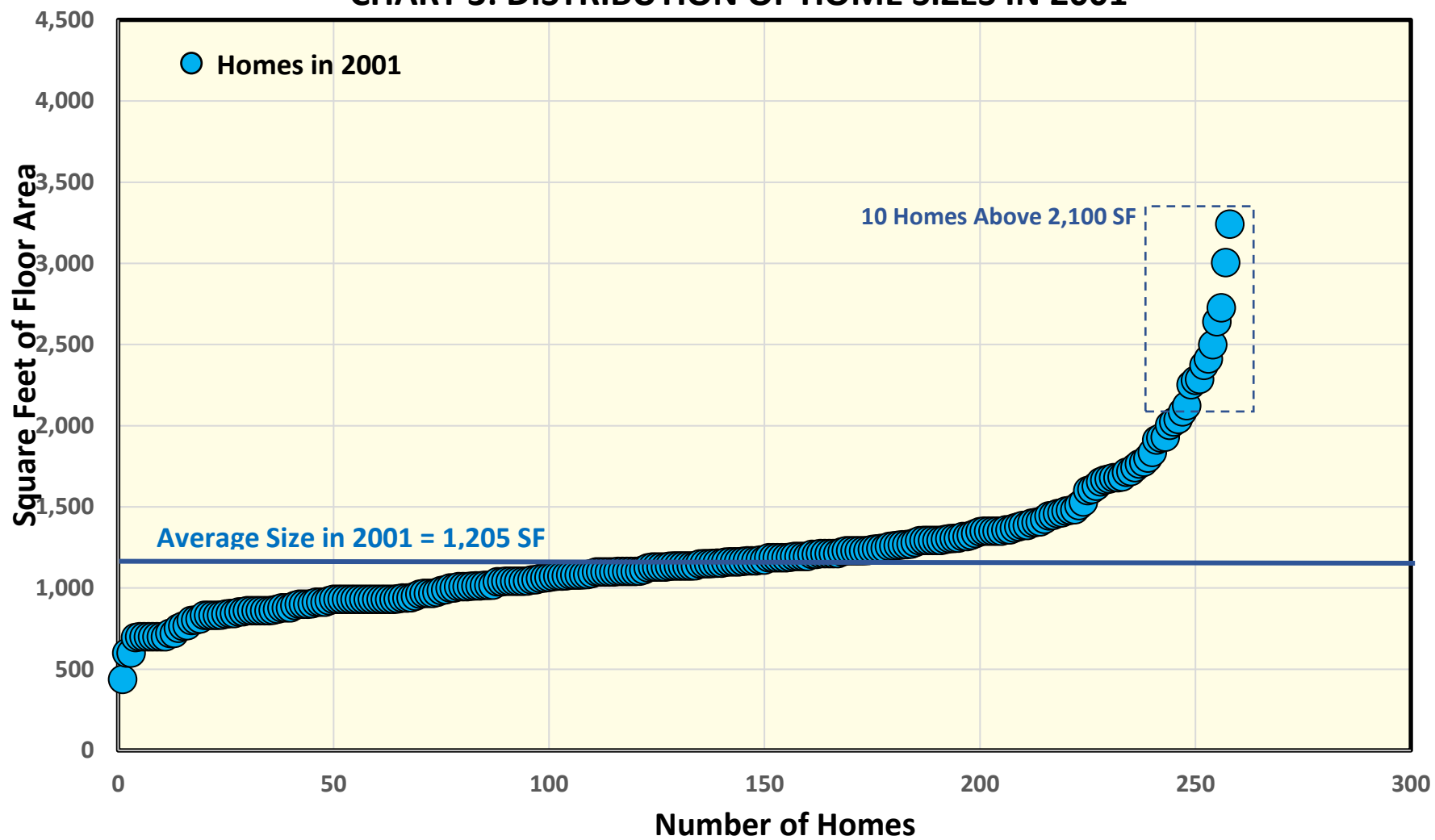
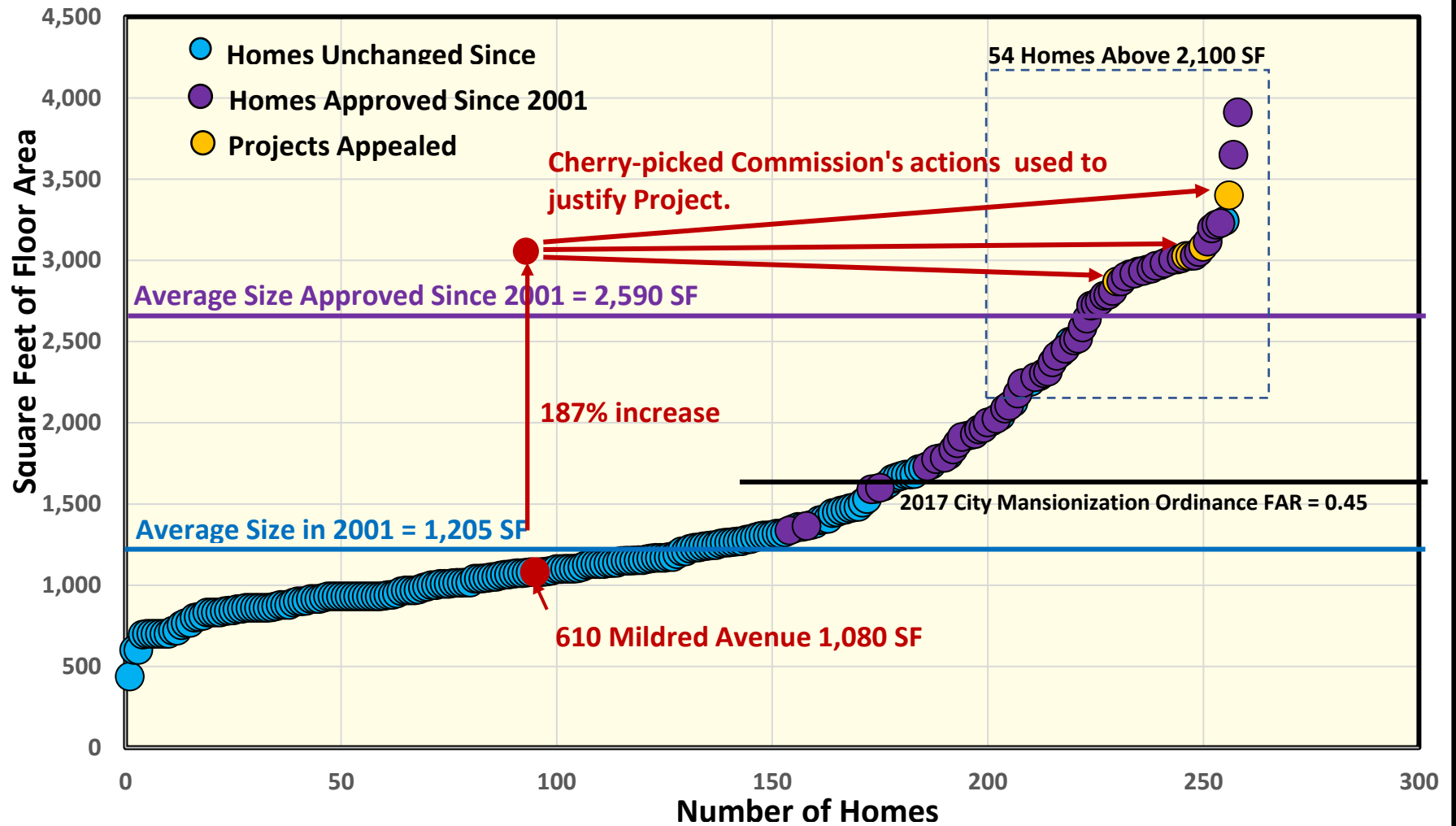
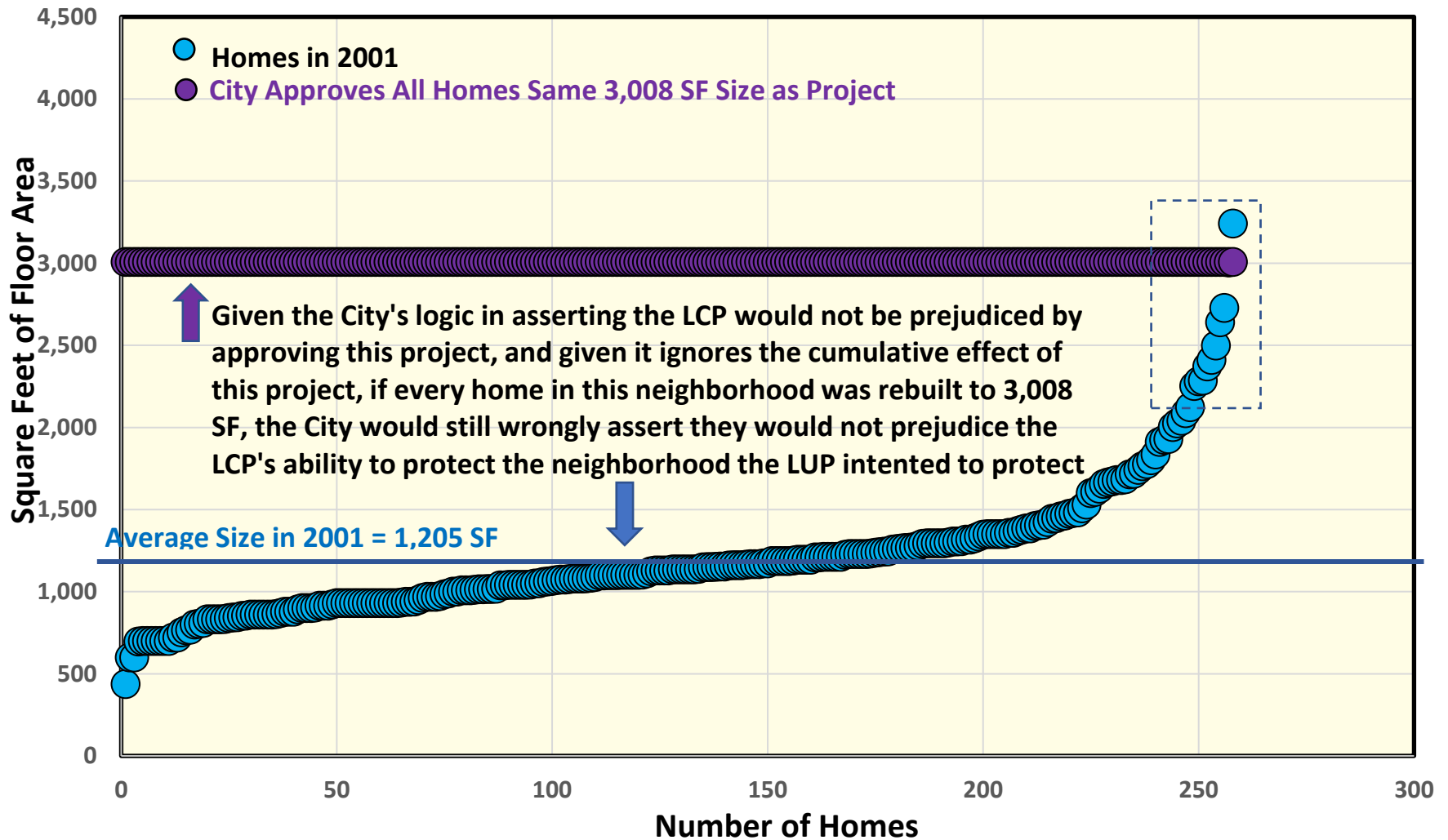


CHART 4: DISTRIBUTION OF HOMES IN 2020





# CHART 5: DISTRIBUTION OF HOME SIZES USING CITY 'S LOGIC



**Chart 5 takes the City's logic to its inevitable extreme:** all 258 homes built to the **Project's** 3,008 SF size. The neighborhood would now be lined chock-a-block over its entire area with homes using the full buildable area all rising 25 feet straight up with roof decks with minimal back yards. Yet the City would still absurdly assert that this completely transformed neighborhood would still be compatible with the mass, scale, and character of the 2001 neighborhood the 2001 VLUP intended to protect.

#### D. CONCLUSION

The Determination is erroneous on numerous counts. Its approval of the CDP for this project is based on incorrect examples of relevant zoning actions and prior approvals, the cherry-picking of guidelines and LUP policies, and purposefully ignoring recent Court rulings and subsequent Commission guidance. Some of the actions the City says supports its position in fact do the opposite.

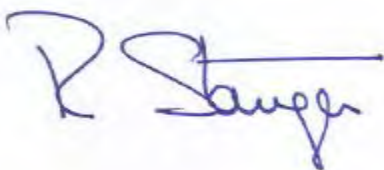
At a minimum, **the Determination is fatally flawed in that it does not address the Project's** adverse cumulative effect on the character of either its streetscape or the larger contiguous Silver Triangle neighborhood. Based on two recent Superior Court rulings and subsequent actions by the Coastal Commission, the City is required a prior cumulative effects analysis. The Determination has no such analysis.

At almost three times the average size of homes on Beach Avenue, the Project itself is clearly incompatible with the mass, scale, and character of its streetscape. It is 70% larger than the largest existing 2-story home on Beach Avenue. The Determination erroneously claims that the **Project's extreme size "will visually enhance the existing neighborhood,"** which is without factual basis or merit and flies in the face of the protections in the Coastal Act and certified Venice Land Use Plan.

The proposed Project at 610 Mildred Avenue will adversely affect the mass, scale and character of its neighbors and the Silver Triangle neighborhood and will continue to increase the significant adverse cumulative effect of the approval of very large homes on the small-scale, modest-home character of the Silver Triangle.

The approval of its CDP by the City must therefore be denied. Please declare Substantial Issue **and require the necessary changes to the project's mass, scale and character so that this single-family residential neighborhood will be protected as required by the Coastal Act and certified Venice Land Use Plan.**

Sincerely,



Richard Stanger  
2409 Clark Avenue

Co-Appellants:



Ingrid Marston  
2319 Beach Avenue  
Venice, CA 90291



Warren Adler  
2334 Beach Avenue  
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Sue Kaplan, President  
Citizens Preserving Venice  
763 Nowita Place  
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	(Project RFA = 3,008 SF, Project FAR = 0.77)
	2019 Average RFA of 2300 Block of Beach Avenue = 1,179 SF (2001 = 1,042)
	2019 Average FAR of 2300 Block of Beach Avenue = 0.43 (2001 = 0.38)

California Coastal Commission  
A-5-VEN-21-0036  
Exhibit 5  
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April 7, 2021

Agenda, Item 6 610 Mildred Ave/DIR-2020-CDP-MEL

To: Honorable WLAAPC Commissioners

Fr: Robin Rudisill

I believe that your job today with respect to this appeal is to reject this CDP determination as the Findings contain significant errors. Staff's response to the appeal points is not only erroneous but it is shameful as their job is to protect the Venice Coastal Zone and they are working very hard to do the opposite. There is no question that a cumulative impacts analysis must be performed for a CDP approval. As is evidenced below, two Superior Court Judges in two separate cases have made that clear and the Coastal Commission has also made that clear. And yet City Planning continues to defy that requirement. City Planning also continues to implement the LUP as if CDP decisions only require analysis of height and yard setbacks (building envelope) and parking requirements and ignores the subjective judgments required with respect to maintaining mass, scale and character. If all that was needed was height and yard setbacks and parking requirements as City Planning suggests, then there would be no subjective judgments involved, and yet the Coastal Act and the LUP have many provisions applicable to this case that require subjective judgments on visual compatibility and maintenance of character, mass and scale. If you don't take a stand on these issues here today all you're doing is setting the applicant up for more appeals, and the Coastal Commission will say in its report, just like the ones referenced below, that "Coastal Act Section 30250(a) requires new residential development be located in close proximity to existing developed areas able to accommodate it and where it will not have significant, cumulative adverse impacts to coastal resources" and "there is no indication in the City's record that the City evaluated the potential cumulative effects of the project."

The CDP determination and the Staff response to the appeal are full of conclusory statements, with no logic between the evidence in the neighborhood and their conclusions. On top of the significant error of not performing a cumulative impacts analysis, City Planning indicates on page A-3 of its appeal response that only areas with recreation uses are the special communities/neighborhoods referred to in Coastal Act Section 30253(e) and so does not correctly analyze the project under Coastal Act Section 30253 or LUP I.E.1., I.E.2., and I.E.3 regarding protection of Venice as a Special Coastal Community (as defined in the LUP). In fact, when City Planning does mention I.E.3. they cherry pick the regulation (as they do throughout with the evidence) by only mentioning "varied styles of architecture" and leaving off "while maintaining the neighborhood scale and massing." In fact, the protection of this low-density single-family neighborhood is so important that the applicable LUP policies require *maintaining* the character and scale of single-family neighborhoods, which should involve a very easy discretionary judgement indeed. No other neighborhood in Venice has the protection of the LUP requiring maintaining the character and scale. This project is NOT consistent with certified LUP policy I.A.2. and I.A.3 as City Planning erroneously states. In addition, the Coastal Commission has previously found that Venice's unique social and architectural diversity should be protected as a Special Coastal Community. In their reports it says this over and over. It's also very clear in the LUP.

City Planning continues to err on these key points in spite of court decisions and prior decisions of the Coastal Commission making it very clear that a cumulative impacts analysis is required. In staff's Response to appeal point No. 4 they completely ignore the court decisions referenced. Please see below for details on those two California Superior Court decisions:

**Stanger v. California Coastal Commission, Case No: 19STCP03010**

**Hon. Mitchell Beckloff, Judge of the Superior Court of California**

**Excerpts from Order Granting Petition for Writ of Mandate in Part, September 15, 2020**

*Petitioner argues the Coastal Commission "abused its discretion by failing to perform a cumulative impact analysis of the...Project." ...The Commission does not take issue with Petitioners' position a cumulative impacts analysis is required under the law....The Commission admitted it did not consider cumulative impacts in its original staff report. The Commission's discussion concerning previously approved projects and the City's ability to prepare a Local Coastal Program (LCP) is insufficient in the context of Public Resources Code section 30250, subdivision (a). While the Commission must consider prejudice to the City's creation of a LCP, the statute requires a determination that the new development "will not have significant adverse effects, either individually or cumulatively, on coastal resources." (Pub. Res. Code 30250, subd. (a).) The Commission's single reference to previously approved projects does not comply with its obligation under the statute. It does not address "the effects of other current projects, and the effects of probable future projects." ....Finally, that the Project in the Commission's view is compatible with community character and size of "surrounding structures" does not address "the effects of other current projects, and the effects of probable future projects." (Pub. Res. Code 30105.5.) ... Here, by statute a cumulative effects analysis requires consideration of "the effects of other current projects, and the effects of probable future projects." (Pub. Res. Code 30105.5.) ... **Regarding subjective judgements, the Order goes on to say:** ...Petitioner contends decisions about character involve "subjective judgment on the project's appropriateness" for the neighborhood. The subjective nature of "compatibility of the project with the surrounding area ..." is supported by caselaw. (Reddell v. California Coastal Com. (2009) 180 Cal.App.4th 956, 970.) The California Coastal Plan adopted in 1972 also recognizes "certain communities and neighborhoods have special cultural, historical, architectural, and aesthetic qualities that are as important to the coastal zone as are its natural resources." (Petitioners' RJN, Ex. C p. 20.) The plain meaning of "character" is "the aggregate of features and traits that form the individual nature of some person or thing." (Random House, Webster's Desk Dictionary (1983) p. 152.) ... Petitioner argues "[f]indings devoid of subjective community character analysis, which is a classic cumulative impacts issue, are insufficient under the law; thus, the Commission abused its discretion in approving the CDP." **Sadly, the subjective judgements issue was not further pursued by the Court as the Judge decided that Petitioners had failed to exhaust their administrative remedies on the issue of subjective versus objective determinations on community character.***

**Robin Rudisill, et al. v. California Coastal Commission, et al., Case No: BS170522**

**Hon. James C. Chalfant, Judge of the Superior Court of California**

**Excerpts from Order Granting Petition for Writ of Mandate, May 28, 2019**

*The Coastal Act requires a cumulative impact analysis: "[T]he incremental effects of an individual project shall be reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." 30105.5... The staff report's analysis failed to address the Project's cumulative impact with other past, present, and future projects on the community and on the City's ability to certify a LCP... The Commission therefore principally compares new projects with those it has previously approved rather than to the small homes originally built decades earlier. The Commission's approach is practical and appropriate, but it runs the risk of changing the character of*

*the community as Petitioners argue... the “foot in the door” and precedential approval of a larger project can lead to a set of approvals that cumulatively change the nature of the neighborhood. The Commission should be sensitive to this fact. It was obligated by section 30105.5 to address the Project’s cumulative impact and failed to do so... The Commission failed to proceed in the manner required by law and abused its discretion by not considering the Project’s cumulative impact with other approved projects on the character of the neighborhood and the City’s ability to certify a LCP. The petition for writ of mandate is granted.*

**City Planning’s response to appeal point No. 5 is 100% erroneous. Please note that every Coastal Commission decision since the above summarized Court Orders were issued has contained a cumulative impacts analysis and references Coastal Act Section 30250 as requiring one:**

See page 11: <https://documents.coastal.ca.gov/reports/2019/6/W11c/w11c-6-2019-report.pdf>

See page 10: <https://documents.coastal.ca.gov/reports/2020/2/W20a&21a/w20a&21a-2-2020-report.pdf>

See page 13: <https://documents.coastal.ca.gov/reports/2020/9/Th18b/Th18b-9-2020-report.pdf>

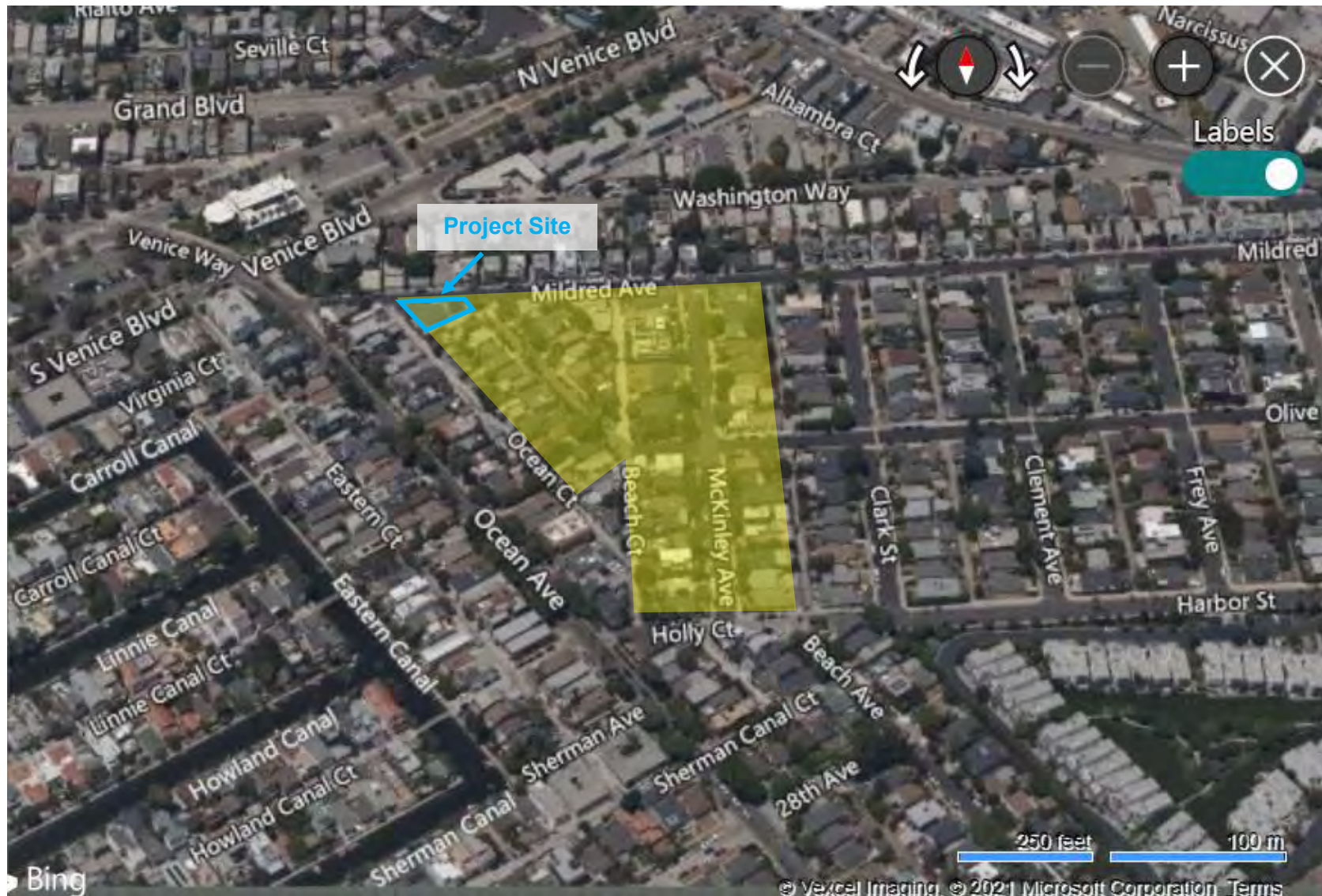
See pages 10 & 14: <https://documents.coastal.ca.gov/reports/2020/10/Th12c/Th12c-10-2020-report.pdf>

See pages 8-9 & 14 : <https://documents.coastal.ca.gov/reports/2020/11/W14a/W14a-11-2020-report.pdf>

See page 16: <https://documents.coastal.ca.gov/reports/2021/3/Th12a/Th12a-3-2021-report.pdf>



## CCC SURVEY AREA





## CITY SURVEY AREA

