CALIFORNIA COASTAL COMMISSION

SOUTH COAST DISTRICT OFFICE 301 E. OCEAN BLVD, SUITE 300 LONG BEACH, CA 90802-4325 VOICE (562) 590-5071 FAX (562) 590-5084



W15a

5-90-789-E27 and -E28 (PACIFIC COAST MANAGEMENT, LLC) August 9, 2021

CORRESPONDENCE

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Via Electronic Mail

August 6, 2021

Chair Padilla and Honorable Commissioners
California Coastal Commission
301 E. Ocean Boulevard, Suite 300
Long Beach, California 90802
c/o: Chloe Seifert
chloe.seifert@coastal.ca.gov

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Re: Request for Continuance

601 Ocean Front Walk, Venice, California Appeals 5-90-789-E27 and 5-90-789-E28

Wednesday, August 11, 2021 Agenda Item W15a

Dear Chair Padilla and Honorable Commissioners,

I write on behalf of my client Pacific Coast Management, LLC ("Applicant") in connection with the above referenced appeals which appear as Agenda Item W15a on your upcoming Wednesday, August 11, 2021 agenda as item W15a. I write to humbly and respectfully request that this item be continued 60 days until your October 2021 meeting to provide ample time for the Applicant to work with staff to resolve any outstanding concerns.

At the outset, I ask for this continuance as I was just brought on to represent the Applicant. The Applicant's prior attorney retired less than a month ago and it would not be fair for a new representative to get up to speed and be able to work with staff in a constructive manner so quickly. I am committed to doing so expeditiously and would not want there to be any prejudice against my client in a continuance.

In addition, the permits at issue have been renewed 26 times without any issues. Therefore, it came as a huge surprise when my client learned staff was recommending denial. Moreover, my client timely filed extension requests. Nearly two years has passed with no action on these requests and then out of the blue we receive a staff report recommending denial. Again, this is not fair and equitable after so much time has passed.

Allen Matkins Leck Gamble Mallory & Natsis LLP Attorneys at Law

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There are a number of inaccuracies in the staff report and staff findings that require expert analysis and reports to correct. This simply cannot be completed within the two weeks that were provided since the staff report was published. We intend to do so in short order and therefore request this short 60-day continuance.

We are confident that we can address staff's concerns within 60 days and move this project forward quickly. My client is dedicated to building this project and is ready to do so. Again, we respectfully request a 60 day continuance and appreciate the Commission's consideration of this request.

Very truly yours,

Spencer B. Kallick

Spencer B. Kallick

SBK