

CALIFORNIA COASTAL COMMISSION

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



W15c

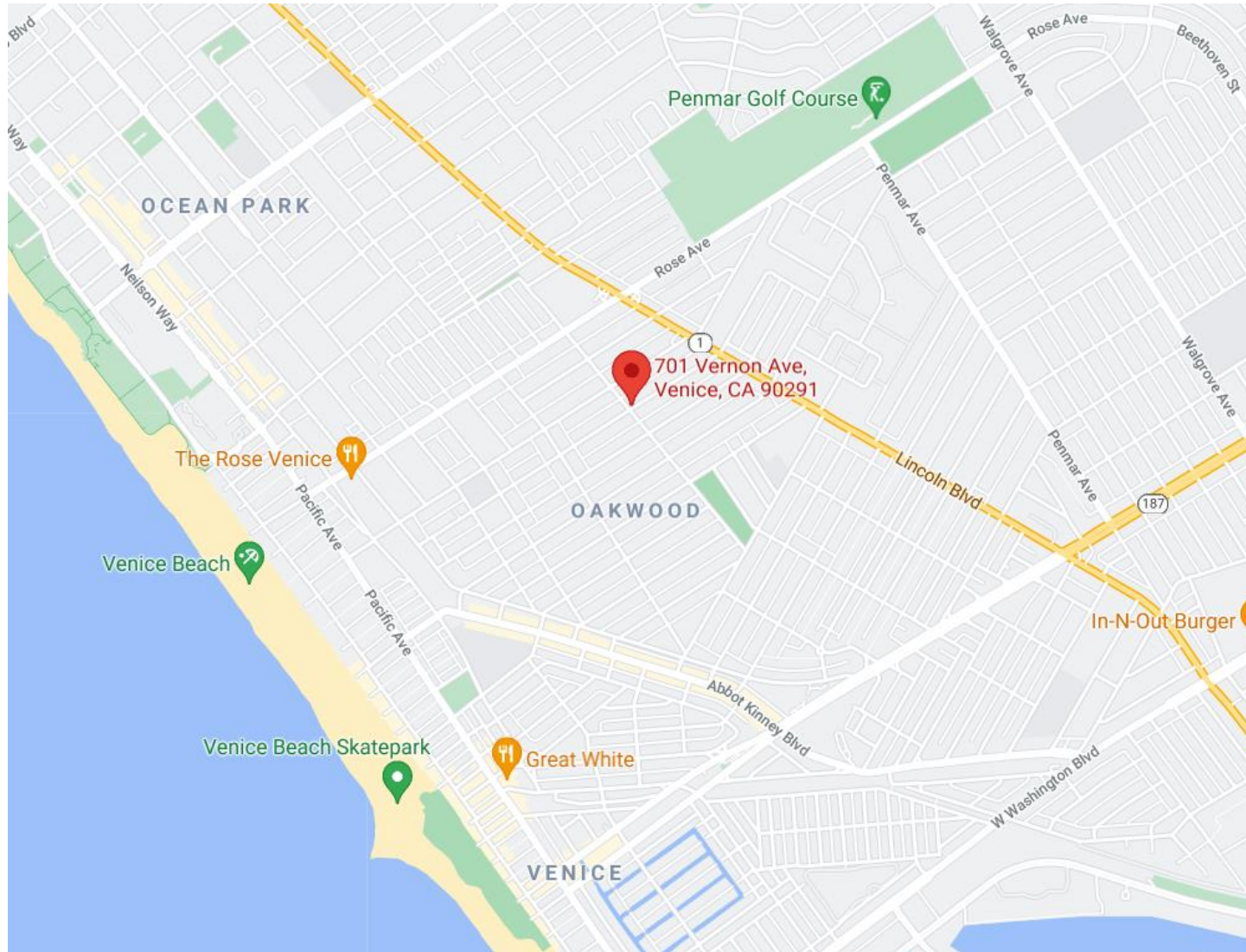
A-5-VEN-21-0051 (Zakoot)

September 8, 2021

EXHIBITS

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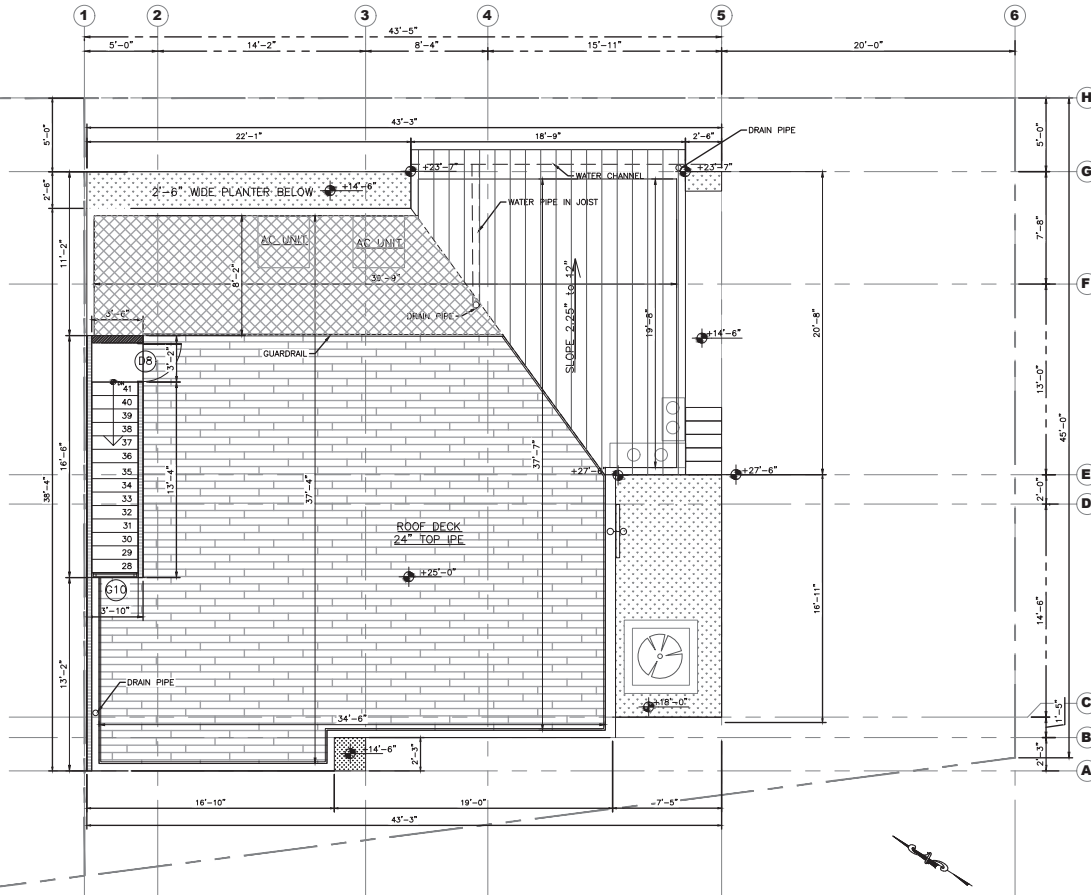
VICINITY MAP



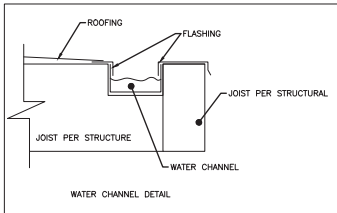
PROJECT SITE



PARCEL A



IF ACCESS AREA CALCULATION:
A 1 3.83' x 16.5' = 63.25 SF
AL ROOF ACCESS = 63.25 SF



1 ROOFTOP FLOOR PLAN
FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"
TRUE NORTH

California Coastal Commission
A-5-VEN-21-0051
Exhibit 2
Page 1 of 9

WALL SCHEDULE

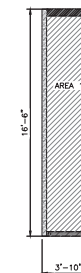
	CONBATHETE BLOCK
	2" fixed 6" WOOD STUD FRAMED PARTITION, 16" O.C. WITH 5/8" THICK GYPSUM WALL BOARD EACH SIDE TAPE AND APPLY 3 COATS JOINT COMPOUND EACH SIDE. (STAGGER JOINTS AT EACH SIDE OF WALL) HATCHED PATTERN DENOTES BEARING WALL. (TYPICAL)
	2" fixed 4" WOOD STUD FRAMED WALL, 16" O.C. WITH 5/8" THICK GYPSUM WALL BOARD, EACH SIDE WITH 3 COATS JOINT COMPOUND, SAND SMOOTH FOR PAINTING. (ALL JOINTS TAPED) (USE MOISTURE RESIST GYPSUM WALL BOARD AT ALL WET LOCATIONS)— TYPICAL
	WINDOW/GLASS

REFER TO SHEET N1 FOR DOORS, WINDOWS AND WALL SCHEDULES

TOTAL HOUSE INDOOR AREA	
LOCATION	AREA (SQ FT)
FIRST FLOOR	1351
SECOND FLOOR	1354
ROOF ACCESS	63
TOTAL HOUSE INTERIOR	2768

OUTDOOR AREA	
LOCATION	AREA (SQ FT)
POOL & JACUZZI	437
PATIO 1	64
PATIO 2	35
PATIO 3	201
DECK 1	282
PATIO 4	107
BALCONY	51
GARDEN	123
ROOF DECK	1207
TOTAL EXTERIOR	2268

ROOFTOP AREA	
LOCATION	AREA (SQ FT)
ROOF ACCESS	63
ROOF DECK	1207



ROOF ACCESS AREA CALCULATION:
AREA 1 3.83' x 16.5' = 63.25 SF
TOTAL ROOF ACCESS = 63.25 SF

CALIFORNIA
AVE
RESIDENCES

PROVIDED BY
THE OWNER/BUILDER:
701 CALI, LLC

DESIGNER:
ALON ZAKOOT
(310) 429-3146
Alonz.atr@gmail.com

ON BEHALF OF:
ALLIANCE TEAM
REALTY, INC.

(818) 574-0606
info.atr@gmail.com

PROJECT
701 VERNON AVE,
VENICE, CA 90291

☒ CONCEPT ONLY:
☐ NOT FOR CONSTRUCTION
☐ CLIENT REVIEW
☐ PERMIT
☐ BID
☐ PERMIT REVISIONS
☐ CONSTRUCTION
COMMENTS

DRAWN
BS

DATE
02/10/2019

REVIEWED

JOB NO.

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DRAWING TITLE
ROOFTOP
FLOOR PLAN
SHEET

A3

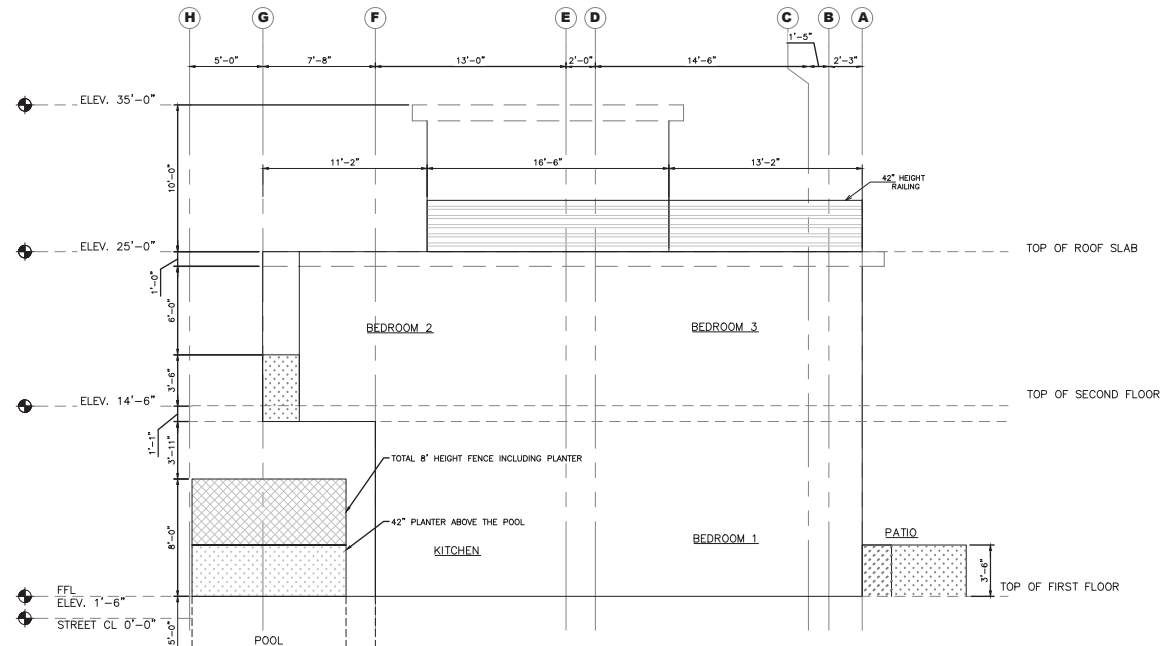
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PARCEL A

1 NORTH ELEVATION

FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"

0 2' 4' 8'



REFER TO SHEET N1 FOR
DOORS, WINDOWS AND WALL
SCHEDULES

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DRAWING TITLE
NORTH & SOUTH
ELEVATION

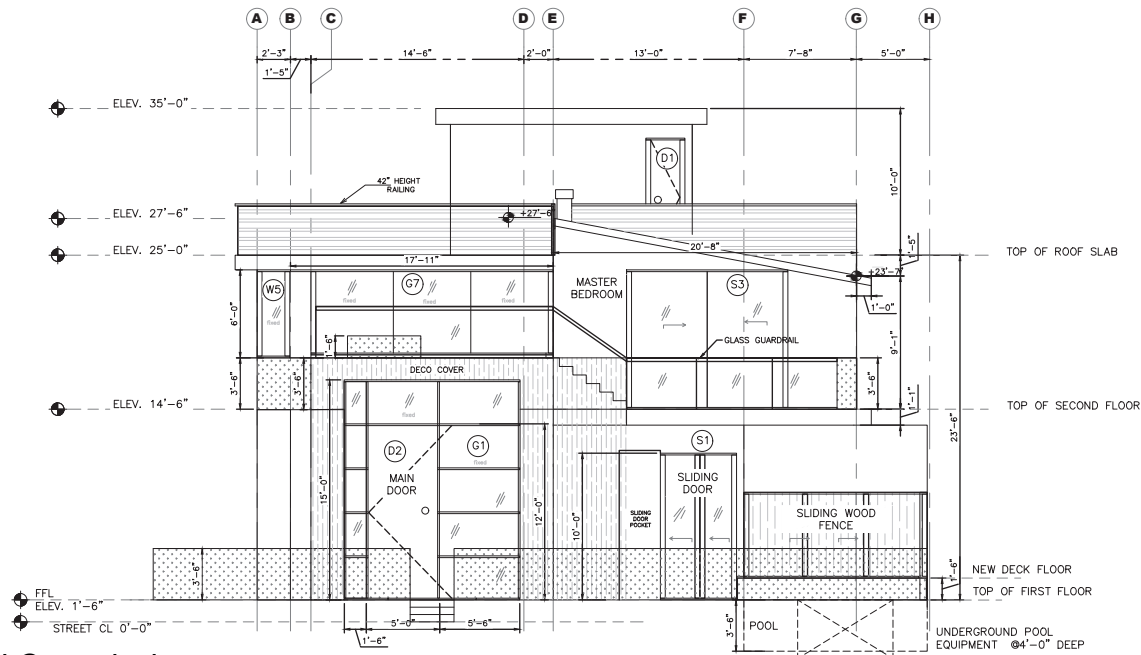
SHEET

E1

2 SOUTH ELEVATION

FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"

0 2' 4' 8'



REFER TO SHEET N1 FOR
DOORS, WINDOWS AND WALL
SCHEDULES

NOTES:

- Primary entryway shall provide the address or unit identification, ornamental low-level lighting to illuminate the entry area, and a landing area.
- Window treatments shall be extruded or recessed from the building facade a minimum of 3 inches.

California Coastal Commission

A-5-VEN-21-0051

Exhibit 2

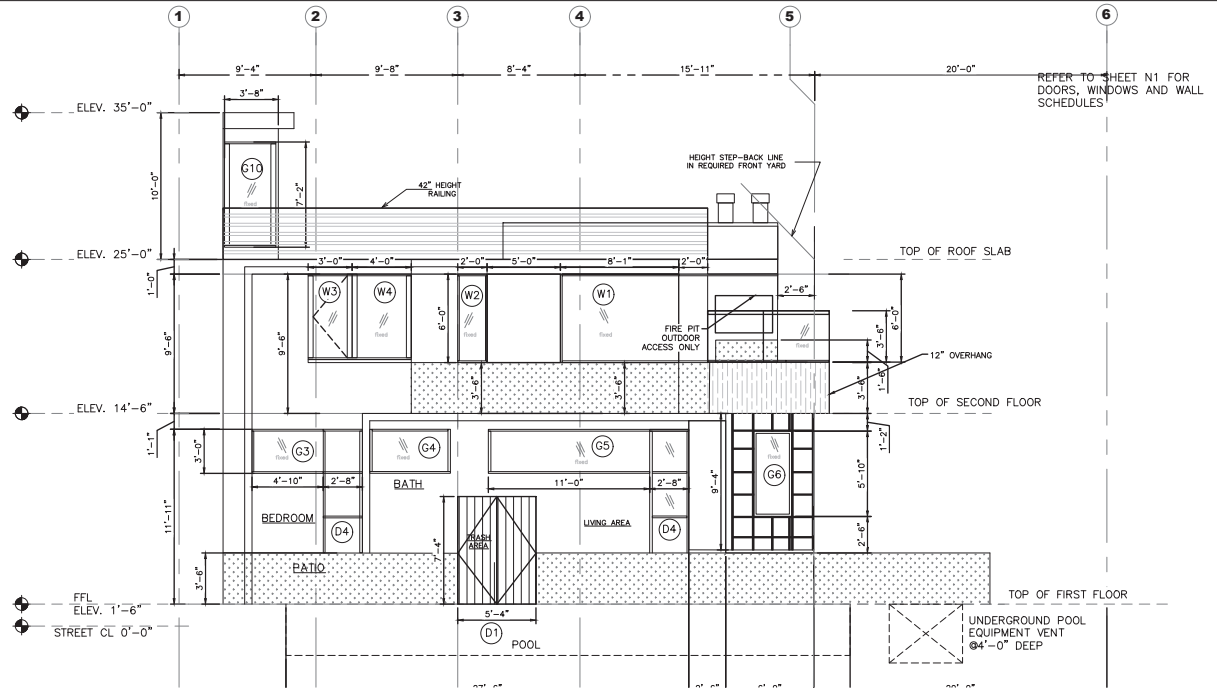
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PARCEL A

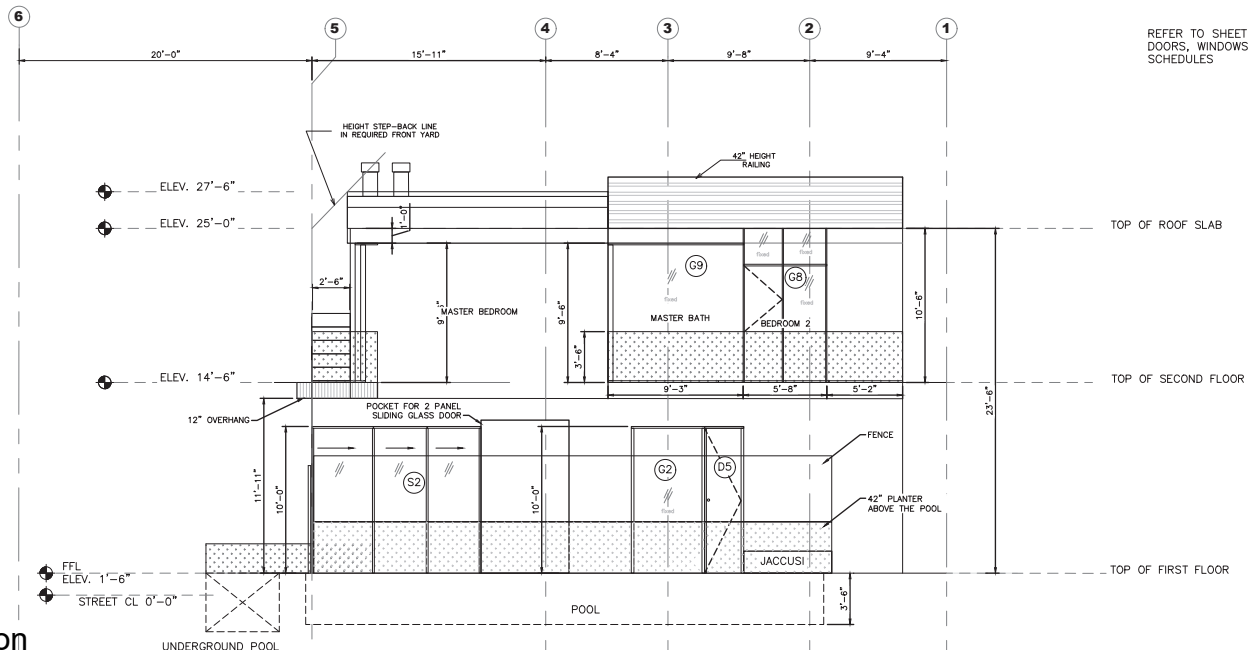
1 WEST ELEVATION

FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"



2 EAST ELEVATION

FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"



CALIFORNIA AVE RESIDENCES

PROVIDED BY
THE OWNER/BUILDER:
701 CALI, LLC

DESIGNER:
ALON ZAKOOT
(310) 429-3146
Alonz.atr@gmail.com

ON BEHALF OF:
**ALLIANCE TEAM
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PROJECT
**701 VERNON AVE,
VENICE, CA 90291**

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DRAWING TITLE
**WEST & EAST
ELEVATION**

SHEET

E2

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California Coastal Commission

A-5-VEN-21-0051

Exhibit 2

Page 3 of 9

PARCEL A



- ① Natural Wood, IPE or Similar at Walls, Decks and at Entryway Landing Areas
- ② Deco Ceramic Tile
- ③ Ash Grey, Smooth Stucco
- ④ Steel Plate, Matte Black
- ⑤ 1-1/2" Steel Flat Bar Guardrail, Matte Black
- ⑥ Glass Guardrail
- ⑦ Patina Steel

California Coastal Commission
A-5-VEN-21-0051
Exhibit 2
Page 4 of 9

CALIFORNIA AVE RESIDENCES

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DATE

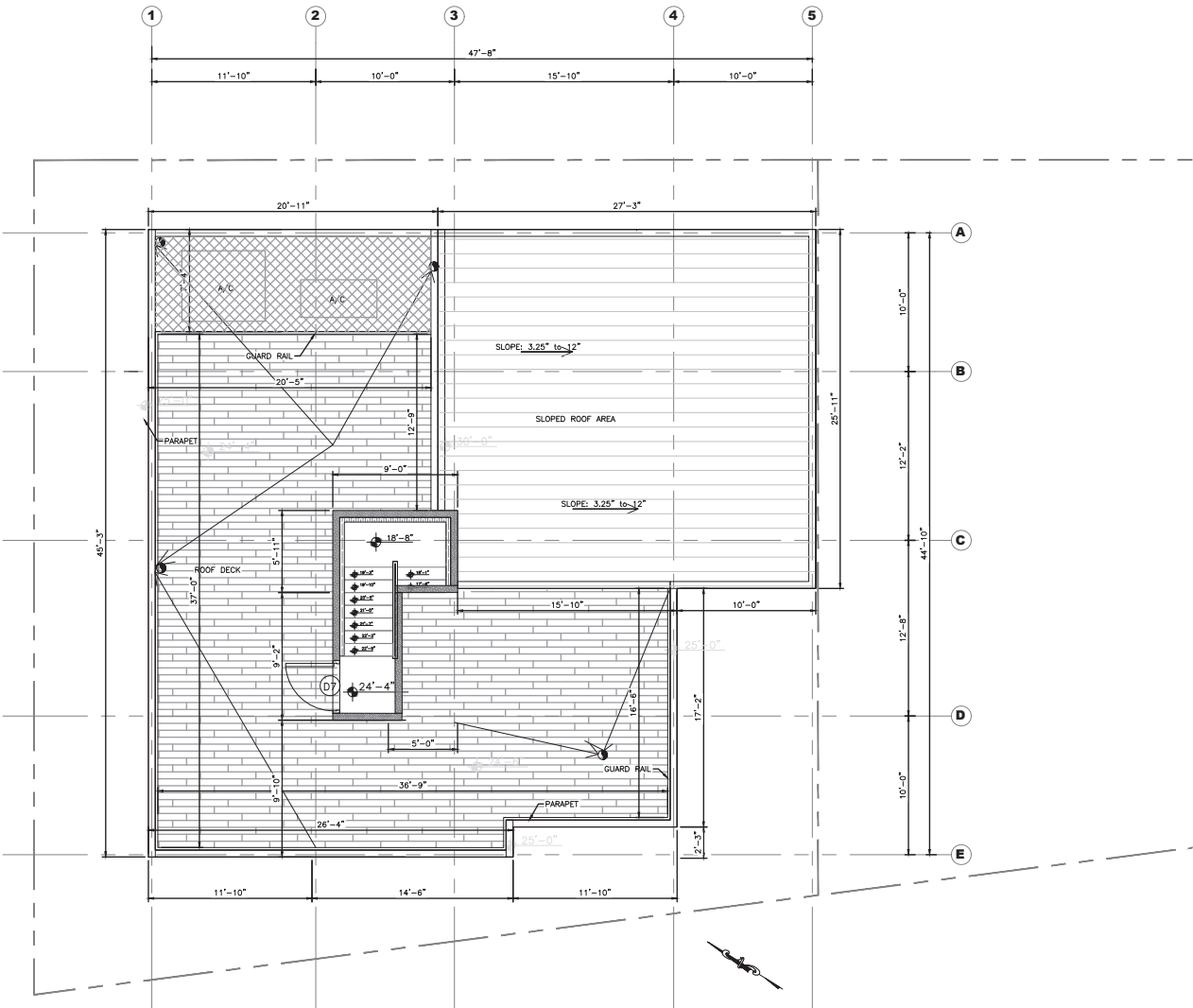
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DRAWING CONTRACT FROM THE DESIGNER &
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DRAWING TITLE
MATERIALS &
RENDERS

SHEET

M1

PARCEL B

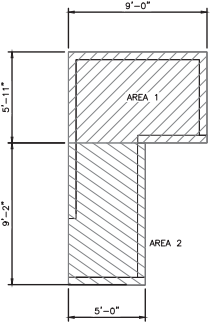


LEGEND	
	6" THICK WOOD WALL

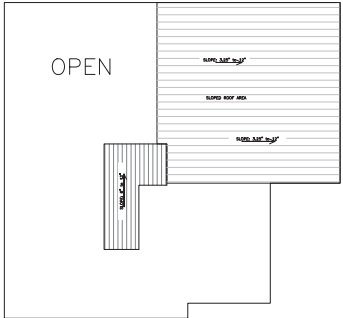
*REFER TO PLAN FOR THE WIDTH DIMENSION

TOTAL HOUSE INDOOR AREA	
LOCATION	AREA (SQ FT)
FIRST FLOOR	1032
SECOND FLOOR	1721
ROOF ACCESS	99
TOTAL HOUSE INTERIOR	2852

GARAGE & OUTDOOR AREA	
LOCATION	AREA (SQ FT)
CAR GARAGE	356
POOL & JACUZZI	422
OUTDOOR PATIO 1F	144
BALCONY 2F	69
ROOF DECK	904



ROOF ACCESS AREA CALCULATION:
AREA 1 9' x 5.92' = 53.3 SF
AREA 2 5' x 9.17' = 45.8 SF
TOTAL ROOF ACCESS = 99.1 SF



1 ROOFTOP FLOOR PLAN
FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"
TRUE NORTH
0 2' 4' 8'

ROOFTOP AREA	
LOCATION	AREA (SQ FT)
ROOF ACCESS	99
ROOF DECK	904

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ON BEHALF OF:
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PROJECT
**702 SUNSET CT.
VENICE, CA 90291**

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☐ CONSTRUCTION

COMMENTS

DRAWN

BS

DATE

1/14/2020

REVIEWED

JOB NO.

0011

IF PLANS ARE NOT MARKED
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DRAWING TITLE

ROOFTOP

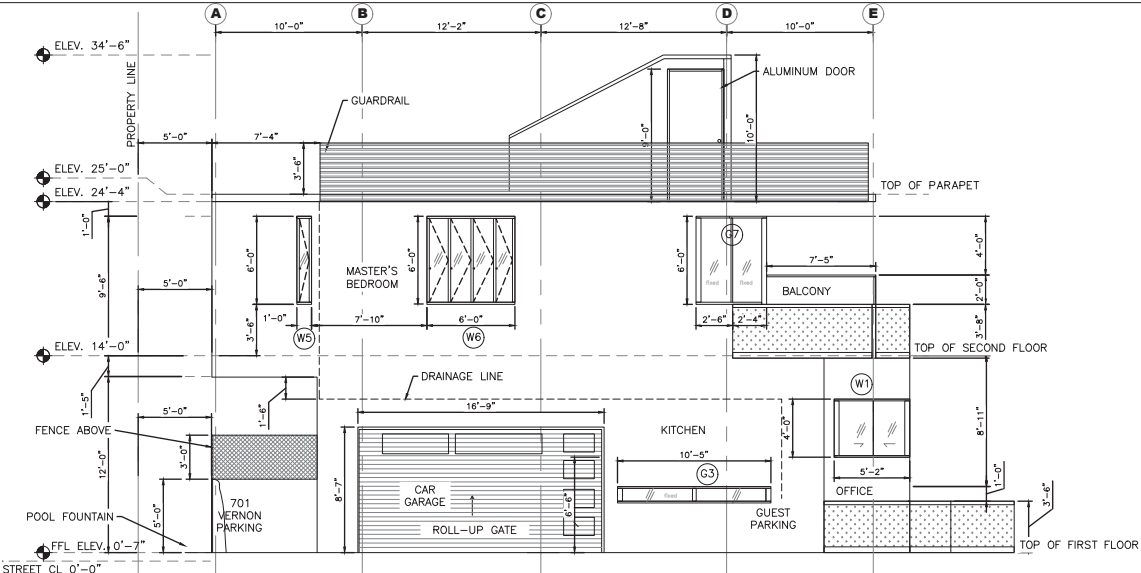
FLOOR PLAN

SHEET

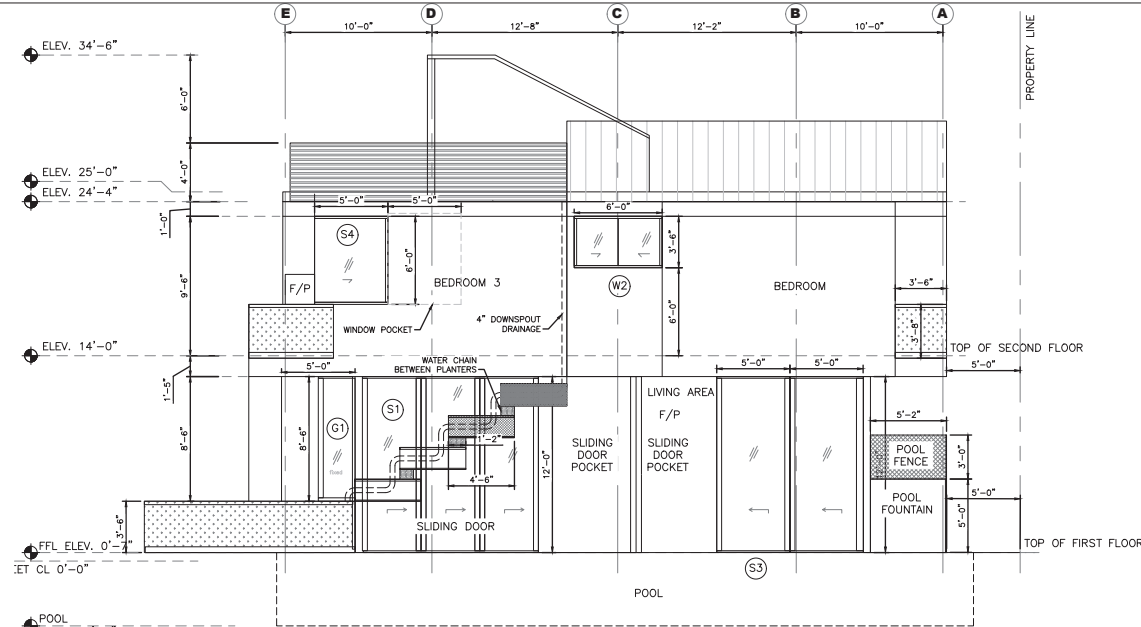
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PARCEL B



1 NORTH ELEVATION
FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"



2 SOUTH ELEVATION
FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"

REFER TO SHEET N1 FOR
DOORS, WINDOWS AND WALL
SCHEDULES

REFER TO SHEET N1 FOR
DOORS, WINDOWS AND WALL
SCHEDULES

- NOTES:
- Primary entryway shall provide the address or unit identification, ornamental low-level lighting to illuminate the entry area, and a landing area.
 - Window treatments shall be extruded or recessed from the building facade a minimum of 3 inches.

CALIFORNIA
AVE
RESIDENCES

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0011

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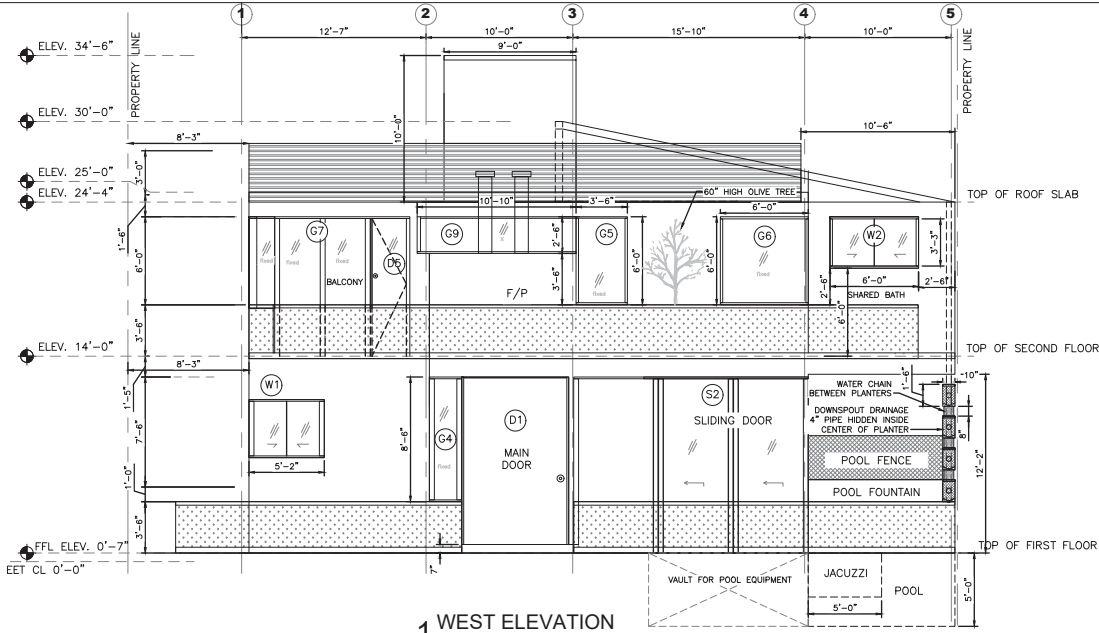
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TO THE DESIGNER'S OBLIGATIONS AND
NOT TO THE USER'S OBLIGATIONS.

DRAWING TITLE
NORTH & SOUTH
ELEVATION

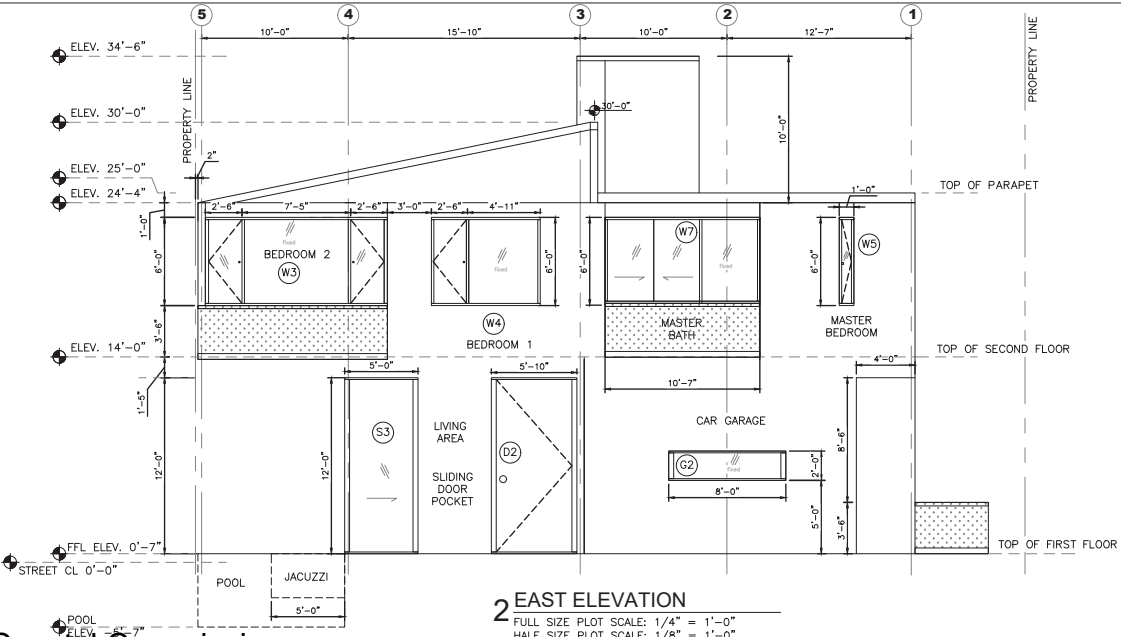
SHEET

E1

PARCEL B



1 WEST ELEVATION
FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"



2 EAST ELEVATION
FULL SIZE PLOT SCALE: 1/4" = 1'-0"
HALF SIZE PLOT SCALE: 1/8" = 1'-0"

REFER TO SHEET N1 FOR
DOORS, WINDOWS AND WALL
SCHEDULES

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WARRANTY. THE DRAWING IS NOT A
WARRANTY. THE DRAWING IS NOT A
WARRANTY.

DRAWING TITLE
WEST & EAST
ELEVATION

SHEET

E2

PARCEL B



- ① Smooth, Off-White Stucco With Aluminum Revealing Channel
- ② Natural Wood, IPE or Similar at Walls, Decks and at Entryway Landing Areas
- ③ Lightly Grey-Tinted Glass
- ④ Stucco Planter
- ⑤ 1-1/2" Steel Flat Bar Guardrail, Matte Black
- ⑥ Patina Steel

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Exhibit 2
Page 8 of 9

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1info.atr@gmail.com

PROJECT 702 SUNSET CT.
VENICE, CA 90291

PROJECT

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☐ BID

☐ PERMIT REVISIONS

☐ CONSTRUCTION

COMMENTS

DRAWN

DATE 4/14/2000

REVIEWED

JOB NO. 0011

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DRAWING TITLE:
MATERIALS &
RENDERS

SHEET:

M1

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701 VERNON AVENUE & 702 SUNSET CT, VENICE, CA 90291



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**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

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PRESIDENT

VAHID KHORSAND
VICE-PRESIDENT

DAVID H. J. AMBROZ
CAROLINE CHOE
HELEN LEUNG
KAREN MACK

DANA M. PERLMAN
YVETTE LOPEZ-LEDESMA
AJAY RELAN

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
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(213) 978-1271

VINCENT P. BERTONI, AICP
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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

CORRECTED DIRECTOR'S DETERMINATION

February 17, 2021

Owner/Applicant

Alon Zakoot
701 Cali, LLC
17200 Ventura Boulevard
Encino, CA, 91316

Representative

Stacy Van Dyke
Alliance Team Realty, Inc.
17200 Ventura Boulevard
Encino, CA, 91316

Case No.: DIR-2018-2002-CDP-MEL

Related Cases: AA-2018-2001-PMLA-SL
ADM-2019-1061-SLD

CEQA: ENV-2018-1990 -CE

Location: 701 & 701 ½ East Vernon
Avenue

Council District: 11 – Bonin

Neighborhood Council: Venice

Community Plan Area: Venice

Specific Plan: Venice Coastal Zone -
Oakwood Subarea

Land Use Designation: Low Medium II Residential

Zone: RD1.5-1

Last Day to File an Appeal: March 4, 2021

DETERMINE that based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15301, 15303, 15315, and 15332, and determine that there is no substantial evidence demonstrating that an exception to the 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 to allow the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,312 square-foot lot into two (2) new small lots, and the construction of a two-story single-family dwelling with roof deck, jacuzzi, and swimming pool on each newly subdivided lot. Five (5) parking spaces provided and the project is 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 a single-family dwelling and detached garage and construction of two Residential Units in the California 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-21-0051

Exhibit 3

Page 1 of 19

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.** Two (2) residential units shall be constructed. One (1) single-family dwelling shall be permitted on each new small lot created pursuant to Parcel Map AA-2018-2001-PMLA-SL and Small Lot Subdivision Ordinance 185,462; the small lot subdivision will result in two (2) Small Lots.
4. **Height.** The project features both flat and varied rooflines; portions of the structure with flat rooflines shall be limited to a height of 25 feet and portions with varied rooflines (slope greater than 2:12) shall be limited to a height of 30 feet; the portions exceeding 25 feet shall be stepped back from the required front yard one foot in depth for every foot in height above 25 feet. Height shall be measured from the midpoint of the centerline of Vernon Avenue.
5. **Parking and Access.** As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide five (5) parking spaces onsite: each single-family dwelling will be designated two spaces and one guest parking space shall be provided. All vehicle access shall be from the rear alley.
6. **Roof Deck.** Railings used on the proposed rooftop deck exceeding the maximum flat roof building height of 25 feet shall be of an open design and limited to a height of 42 inches. Solid glass railings shall be included in the measurement of building height
7. **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.
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. This approval is tied to Case No. AA-2018-2001-PMLA-SL. The applicant shall comply with the conditions of approval listed in Case No. AA-2018-2001-PMLA-SL, which are incorporated herein by reference.
10. 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.
11. Outdoor lighting shall be designed and installed with shielding so that light does not overflow into adjacent residential properties.
12. 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.

13. 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.
14. 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.
15. 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

16. **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.
17. **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.
18. **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.
19. **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.
20. **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.
21. **Condition Compliance.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
22. **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, 701 and 701 ½ East Vernon Avenue, is a relatively flat, rectangular, residential vacant lot with a width of 60 feet and a depth of 121 feet, with a total lot area of approximately 6,312 square feet. The property fronts Vernon Avenue to the southeast, 7th Avenue to the southwest, and abuts an alley, Sunset Court, to the northwest. The subject lot is zoned RD1.5-1 with a General Plan land use designation of Low Medium II Residential. The project site is located in the single permit jurisdiction of the California Coastal Zone and within the Oakwood Subarea of the Venice Coastal Zone Specific Plan.

The RD1.5-1-zoned neighborhood immediately surrounding the property is developed with one to three-story single-family dwellings and two-story, multiple-family dwellings. The property is located within the Los Angeles Coastal Transportation Corridor Specific Plan, Venice Community Plan, Urban Agriculture Incentive Zone, a Calvo Exclusion Area, and Liquefaction Zone.

The applicant is requesting a Coastal Development Permit and Mello Act Compliance review to authorize demolition of one, one-story single-family dwelling with detached garage, subdivision of an existing 6,306.2 square-foot lot into two new small lots, and the construction of two, two-story single-family dwellings with roof deck on each newly subdivided lot, jacuzzi, swimming pool, and five (5) parking spaces provided onsite.

Vernon Avenue is a designated Local Street with a designated right-of-way width of 60 feet and developed with a roadway width of 36 feet. Vernon Avenue is improved with an asphalt roadway, gutter, curb, and sidewalk.

7th Avenue is a designated Local Street with a designated right-of-way width of 60 feet and developed with a roadway width of 36 feet. 7th Avenue is improve with an asphalt roadway, gutter, curb, and sidewalk.

Sunset Court is an alley adjoining the subject site to the south with a right of way width of 13.5 feet and roadway width of 6.75 feet.

Previous zoning related actions in the area include:

DIR-2016-4874-CDP-SPP-MEL – On October 17, 2019, the Director of Planning approved a Coastal Development Permit, Specific Plan, and Mello Act compliance review authorizing the demolition of an existing one-story, 1,805 square foot duplex on two lots totaling approximately 6,745 square feet; conversion of 2 residential lots to 3 condominium units; and construction of a 3-story, 8,575 square foot 3-unit residential condominium structure with roof decks and 8 underground parking spaces, within the Single Permit Jurisdiction area of the Coastal Zone, located at 2300 and 2302 Pisani Place.

DIR-2017-2944-CDP-MEL – On May 1, 2018, the Director of Planning approved a Coastal Development Permit and Mello Act compliance review authorizing the demolition of an existing one-story, single-family residence and detached garage and the construction of a new two-story, 3,616 square-foot single-family home with a roof deck, an attached two-car garage, and a swimming pool, within the Single Permit Jurisdiction area of the Coastal Zone, located at 640 E. Milwood Avenue.

DIR-2017-4862-CDP-MEL – On April 13, 2018, the Director of Planning approved a coastal development permit and Mello Act Compliance Review authorizing the demolition of an existing one-story single-family dwelling and construction of a new 2,411 square-foot two-story single-

family dwelling, within the single permit jurisdiction area of the Coastal Zone, located at 2334 S. Cloy Avenue.

DIR-2017-1608-CDP-MEL – On October 23, 2017, the Director of Planning approved a coastal development permit and Mello Act Compliance Review authorizing the construction of a new two-story single-family dwelling, within the single permit jurisdiction area of the Coastal Zone, located at 2405 S. Boone Avenue.

DIR-2016-2992-CDP-MEL – On April 7, 2017, the Director of Planning approved a coastal development permit and Mello Act compliance review for the demolition of an existing single-family dwelling and the construction of a new, three-story, 2,706 square-foot single-family dwelling and a two-story accessory structure, located at 622 East Brooks Avenue.

ZA-2015-2749-CDP-MEL – On December 7, 2016, the Zoning Administrator approved a coastal development permit and Mello Act compliance review for the demolition of an existing single-family dwelling and the construction of a new, two-story, 2,996 square-foot single-family dwelling with an attached garage, located at 638 East Sunset Avenue.

ZA-2015-913-CDP-MEL – On January 29, 2016, the Zoning Administrator approved a coastal development permit and Mello Act compliance review for the demolition of a single-family dwelling and construction of a two-story, 3,503 square-foot single-family dwelling with an attached two-car garage within the single jurisdiction of the Coastal Zone, located at 644 East Sunset Boulevard.

Public Hearing

A joint public hearing was held by the Deputy Advisory Agency (Juliet Oh) and Hearing Officer (Kenton Trinh) on December 11, 2019 at 11:10 a.m. at the Los Angeles City Hall, Room 1070. The project applicant and representative, Alon Zakoot and Stacy Van Dyke were in attendance. No members of the public were present. The Deputy Advisory Agency and members of the Subdivision Committee requested changes to the map to reflect the required dedication along the rear alley, required perimeter setbacks, and corrections to the parking layout. In addition, the applicant was asked to prepare and submit a Historical Resources Assessment (HRA) for the existing residential structure, to be reviewed by the Office of Historic Resources (OHR). The applications were taken under advisement to allow time for a revised map and HRA to be submitted.

Correspondence

Letter dated November 13, 2019

David Hertz, a Venice resident, voiced concerns over the demolition of a potentially historic home and the proposed mass and scale of the project in relation to its surroundings.

Letter dated December 15, 2019

Karen Jones, property owner in Venice, voiced concerns over the mass the scale, nonconforming style, and density of the proposed project and the effects it will have on her property.

On July 8, 2020, a Historical Resources Assessment Report, prepared by Sapphos Environmental, was submitted to the Office of Historical Resources for review. The Office of Historical Resources concurred with the report findings and for the purposes of CEQA, found that the property was not a historic resource.

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 proposed project consists of the demolition and construction of four dwelling units. The subject site is not located within an area with known Archaeological or Paleontological Resources. However, if such resources are later 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 project site is located in a developed residential neighborhood improved with single and multi-family dwellings. The proposed project can be accommodated by the existing infrastructure and by existing public services. The area surrounding the project is developed with other residential dwellings thereby making the project site contiguous with, and in close proximity to, existing developed areas that are able to accommodate it.

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 project is located within a residential neighborhood zoned RD1.5-1 and is developed with single and multi-family residential structures that are one to three stories in height. There are 40 residential structures in the neighborhood block of Vernon Avenue bound by 7th Avenue and Lincoln Boulevard. Of the 40 structures, one is three stories, 12 are two stories, 27 are one-story structures. The project is located at the intersection of 7th Avenue and Vernon Avenue. The existing structures adjacent to the intersection are comprised of one-story single-family dwellings. The proposed two-story single-family dwellings provide a 15-foot front yard setback on Vernon Avenue, consistent with the requirements of the RD1.5 zone and further recess portions of the side walls along 7th Avenue to reduce the massing of the structure. The site is located within an area adjacent to a commercial corridor zoned C2-1 that is designated for Community Commercial use and developed with commercial buildings up to three stories in height. The subject site and surrounding areas are

relatively flat with no direct views to the Pacific Ocean; no natural landforms will be altered as part of the project. As such, the proposed project will be visually compatible with the character of the surrounding area.

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 one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,312 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite; two spaces will be provided for each single-family dwelling and one guest parking space will be shared. As conditioned by Case No. AA-2018-2001-PMLA-SL, the project is required to construct a 5-foot wide sidewalk and landscaping on Vernon Avenue and Sunset Court. The project provides sufficient parking for the single-family dwellings and the required improvements to the adjacent right-of-way will enhance and maintain the public access for both vehicles and pedestrians. No permanent structures will be placed within the public-right-of-way and public access to the coast will not be obstructed. As such, the proposed project will not conflict with any public access policies of the Coastal Act.

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 the Calvo Exclusion Area, Liquefaction Zone, and within 4.19 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 project proposes the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,312 square-foot lot into two new small lots, and the construction of a two-story single-family dwellings with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite, located in the Single Permit Jurisdiction area of the Coastal Zone; and have no adverse impacts on public access, recreation, public views, or the marine environment, as the property is located within a developed residential area adjacent to Vernon Avenue. 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 designate public access views. 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. 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. No roof access structure is proposed. The project is limited to the development of one lot.

Policy I.A.7 outlines density and development standards for areas designated for multi-family dwellings.

Use: Duplexes and multi-family structures are allowed. The project consists of a two-lot small lot subdivision and the construction of a two-story single-family dwelling on each newly created lot. The project will replace a single residential structure with multiple (two) residential structures.

Density: One unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units. The project proposes a density of two units, one new single-family dwelling on each new Small Lot. Parcel A has a lot size of 2,873.1 square-feet and Parcel B has a lot size of 3,009 square-feet. The total net lot area is 6,312 square feet, the project provides a maximum density of two dwelling units.

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. The proposed yards are consistent with existing pattern of development along Vernon Avenue and comply with the requirements of Ordinance No. 185,462.

Height: Building height shall not exceed 25 feet for buildings with roofs or 30 feet for buildings with a varied roofline (slope greater than 2:12). Any portion that exceeds 25 feet in height shall be setback from the required front yard one foot for every foot in height above 25 feet. The proposed single-family dwellings will have a flat roof height of 24 feet, 4 inches and a varied roofline height of 30 feet.

Policy II.A.3 outlines the Parking Requirements for the project. Pursuant to Z.I. No. 2406, required parking for subdivision projects shall be the parking requirements for multiple dwelling uses, based on the width of the pre-subdivided lot, under Section 13.D of the Venice Coastal Zone Specific Plan. Multiple dwelling projects on lots 35 feet or more in width (if adjacent to an alley) are required to provide two spaces for each dwelling unit and one guest parking space for each four or fewer units. The proposed project provides five (5) parking spaces total: two standard parking space and three compact parking spaces, one of which will serve as a guest parking space. All parking spaces are accessible via the alley.

The proposed project 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. In addition to the Regional Interpretative Guidelines, the policies of Venice Local Coastal Program Land Use Plan (the Land Use Plan was certified by the Coastal Commission on June 14, 2001) have been reviewed and considered.

The project proposes the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,306.2 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with roof deck on each newly subdivided lot; five (5) parking spaces provided onsite. The Regional Interpretive Guidelines have been reviewed, analyzed, and considered and the proposed project is found to 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 Certified Venice 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 is located in the Single Permit jurisdiction of the Coastal Zone. The City of Los Angeles issues Coastal Development Permits in the Single Permit Jurisdiction, which can be further appealed to the Coastal Commission. The small lot subdivision and new residential structures do not conflict with prior decisions of the Coastal Commission.

- In March 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 for the demolition of a two-story single-family dwelling and accessory structure, subdivision of the lot into two small lots, and the construction of two new two-story single-family dwellings, in the single permit jurisdiction, located at 415 & 417 Sunset Avenue (Appeal No. A-5-VEN-17-0001).
- In December 2016, the Coastal Commission approved the demolition of a duplex and triplex, subdivision to create four residential parcels, and construction of four three-story single-family dwellings, located at 742-748 Brooks Avenue (Application No. A-5-VEN-16-0083).

- In March 2016, 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 for the demolition of a single-family dwelling, a small-lot subdivision of a 4,670 square-foot lot into two lots, and the construction of a new two-story single-family dwelling on each lot, located at 758 Sunset Avenue (Appeal No. A-5-VEN-15-0071).
- In September 2014, 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 for the demolition of two single-family dwellings, a subdivision to create three new lots, and the construction of three new single-family dwellings, located at 644 Sunset Avenue and 607 7th Avenue (Appeal No. A-5-VEN-15-0071).

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 applicable decisions of the Coastal Commission shall guide local governments in their actions in carrying out their responsibility and authority under the California 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 proposed project will neither interfere nor reduce access to the shoreline as the site is not located near any shoreline. The property has no direct access to any water or beach and there will be no dredging, filling, or diking of coastal waters or wetlands. In addition, there are no environmentally sensitive habitat areas or known archaeological or paleontological resources on the site.

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

A Categorical Exemption, ENV-2018-1990-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 one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,306.2 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class 1), 15303 (Class 3), 15315 (Class 15), and 15332 (Class 32).

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 proposes the demolition of one single-family dwelling and detached garage.

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. In urbanized areas, up to three single-family dwellings may be constructed under this exemption. The proposed project qualifies for a Class 3, categorical exemption because it consists of the construction of one single-family residence on each of the newly subdivided lots.

The Class 15 categorical exemption allows for minor subdivisions in urban areas. A project qualifies for a Class 15 Categorical Exemption if it is a division of property in an urbanized area and meets the six (6) conditions as described in this section. Preliminary Parcel Map No. AA-2018-2001-PMLA-SL satisfies all six conditions and therefore qualifies for the Class 15 Categorical Exemption.

a. *A subdivision of four or fewer parcels.*

The project proposes to subdivide one parcel to create two new parcels.

b. *Conform with the General Plan and Zoning.*

The site currently is developed with one, one-story single-family dwelling. The site is zoned RD1.5-1 and has a General Plan Land Use Designation of Low Medium II Residential. The project proposes the construction of two single-family dwellings on two new lots and is in conformance with the General Plan and Zoning designation.

c. *Require no variances or exceptions.*

No variances or exceptions are requested or required as part of this project.

d. *Have all services and access available per local standards.*

The project site will be adequately served by all public utilities and services given that the property is located in an urban tract with water supply, sewage and waste disposal infrastructure, and power lines installed. Vernon Avenue and the abutting alley are improved streets with existing utilities and infrastructure to serve residences in the area. The street and alley are accessible to emergency vehicles. Since there is a minor net gain in the number of units on the subject site, no significant increase in population or density is anticipated. There will be no significant impact on the capacity of existing utilities and services.

- e. ***Must not be involved in a division of a larger parcel within the last two years.***

There is no record of any previous subdivisions in the last two years on record for the subject site.

- f. ***Must not have a slope greater than 20 percent.***

No slope greater than 20% is indicated on the parcel map or topographic survey.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria:

- a. ***The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.***

The site currently is developed with two, one-story single-family dwellings. The site is zoned RD1.5-1 and has a General Plan Land Use Designation of Low Medium II Residential. Since the project is for the construction of two new single-family dwellings, the project is in conformance with the General Plan and Zoning designation.

- b. ***The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.***

The site - located at 701 and 701 ½ East Vernon Avenue - is wholly within the City of Los Angeles. Lots surrounding the subject site are developed with single-family and multi-family dwellings.

- c. ***The project site has no value as habitat for endangered, rare or threatened species.***

The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species. The area around the site is urbanized and surrounded by residential use. NavigateLA shows that the subject site is not located in a Significant Ecological Area.

- d. ***Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.***

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will reduce any potential impacts on noise and water quality to less than significant. The creation of noise is limited to certain decibels, restricted to specific hours. The proposed project is not adjacent to any water sources and does not involve excavations that may have an impact on the water table. The project will not result in a gain or loss of residential units, therefore, impacts to public services and air quality are deemed insignificant. Traffic congestion will not be impacted by the project; the number of trips generated by the development will not result in a net increase because the area's density and population will not change significantly. Likewise, air quality will not worsen as a result of the proposed project.

- e. ***The site can be adequately served by all required utilities and public services.***

The project site will be adequately served by all public utilities and services given that the

property is located in an urban tract with water supply, water treatment, sewage and waste disposal infrastructure, and power lines. Vernon Avenue and the abutting alley are improved streets with existing utilities that service the various other dwellings in the area. The street and alley are accessible to emergency vehicles. The project will not result in a gain or loss of residential units, therefore, there will be no significant increase in population or density is anticipated. As such, no significant impact on the capacity of existing utilities and services is anticipated.

Further, 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. The subject property and its surrounding residential neighborhood are 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 lots zoned RD1.5-1 and Low Medium II Residential land use designation. The proposed construction of two dwelling units will not exceed thresholds identified for impacts to the area (i.e. traffic, noise, etc.) and 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 proposed project consists of work typical in a residential neighborhood and, as such, 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 structure 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). A Historical Resources Assessment was prepared by Sapphos Environmental dated June 23, 2020. The report found that the buildings do not appear to be individually eligible for listing in the National Register, the California Register, or as an HCM and would not contribute to a potential HPOZ. This property was constructed early in the 20th century but does not possess significant association with the movement. In addition, this project property falls within the boundaries of the Oakwood Planning District, but no information was found to suggest the subject property has a significant association with the African American community. The Office of Historic Resources (OHR) reviewed the report and concurred with the findings, that the existing structure is not eligible for designation on the California or National Register of Historic Places, nor as an HCM.

The project is determined to be categorically exempt and does not require mitigation or monitoring measures; no alternatives of the project were evaluated. An appropriate environmental clearance has been granted.

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 located on a 6,312 square-foot lot in the Venice Coastal Zone. A Determination issued by the Los Angeles Housing and Community Investment Department (HCIDLA) dated May 7, 2018 states that the property currently maintains a single-family dwelling with three bedrooms. HCIDLA collected data from April 2015 through April 2018, utilizing data provided by the current owners. HCIDLA was provided with tax bills dated from 2013 to 2016, which showed the homeowners exemption was taken. The owners also provided utility bills from the Department of Water and Power (DWP), which showed little to no usage. Based on documents provided and research conducted by HCIDLA, the previous owner had occupied the property as their primary residence within the last three (3) years. 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 two (2) Residential Units. 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 two (2) new Residential Units is found to be categorically exempt from the Inclusionary Residential Unit requirement for New Housing Developments.

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 (Downtown Los Angeles), 818 374-5050 (Valley), 310 231-2912 (West Los Angeles) 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 **15 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:

Metro Public Counter
201 N. Figueroa St., 4th Floor
Los Angeles, CA 90012
(213) 482-7077

Valley Public Counter
6262 Van Nuys Blvd.,
2nd Floor
Los Angeles, CA 91401
(818) 374-5050

**West Los Angeles
Public Counter**
1828 Sawtelle Blvd.,
2nd Floor
Los Angeles, CA 90025
(310) 231-2901

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.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

VINCENT P. BERTONI, AICP
Director of Planning

Approved by:

Reviewed by:


Faisal Roble, Principal City Planner


Juliet Oh, Senior City Planner

Prepared by:



Sienna Kuo, Planning Assistant
sienna.kuo@lacity.org



Eric Garcetti, Mayor
Rushmore D. Cervantes, General Manager

DATE: May 7, 2018

TO: Debbie Lawrence, Senior City Planner
City Planning Department

FROM: Robert Manford, Environmental Affairs Officer 
Los Angeles Housing and Community Investment Department

SUBJECT: **Mello Act Determination for 701-701 ½ East Vernon Avenue, Venice, CA 90291**

Planning Case #: DIR-2018-2002-CDP-MEL

Based on information provided by 701 Cali, LLC, a California limited liability company ("Owner"), the Los Angeles Housing + Community Investment Department (HCIDLA) has determined that no affordable unit exists at 701-701 ½ East Vernon Avenue, Venice, CA 90291.

The property consists of a single family dwelling with three (3) bedrooms. Per the statement on the application, owner proposes the demolition of the existing property to build two (2) new single family dwellings through a small lot subdivision. Per Grant Deed, on December 14, 2017, Owner purchased the property from Bruce Crawford and Etta Marie Crawford executor of the estate of Inez W. Crawford deceased probate case no 17stpb04643. The Owner has not filed for a new building permit application or demolition permit with the Los Angeles Department of Building and Safety (LADBS).

Section 4.4.3 of the Interim Administrative Procedures for Complying with the Mello Act requires that HCIDLA collect monthly housing cost data for at least the previous three (3) years. The Owner applied with the City of Los Angeles Department of City Planning on April 11, 2018. HCIDLA must collect data from: April 2015 through April 2018.

On April 19, 2018, tenant letters addressed to "Occupant" were mailed to property addresses by certified mail. On May 7, 2018, HCIDLA received the signed certified mail receipts.

Per Owner, the previous owner occupied the property. Owner provided property tax bills from 2013-2016 which show the homeowner's exemption was taken. Based on this and research done by HCIDLA, the previous owner occupied the property as their primary residence within the last three (3) years.

Owner claims property is currently vacant. Owner provided Department of Water and Power (DWP) bills which show little to no usage. Based on this and research done by HCIDLA, Owner has established that the property is vacant and therefore, no affordable unit exists.

cc: Los Angeles Housing and Community Investment Department File
701 Cali, LLC
Richard A. Rothschild, Western Center on Law and Poverty, Inc.
Susanne Browne, Legal Aid Foundation of L.A.
Juliet Oh, City Planning Department

RM:MAC:rt

HIMS: 17-124859

California Coastal Commission
A-5-VEN-21-0051
Exhibit 3
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WEST LOS ANGELES AREA PLANNING COMMISSION

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

www.planning.lacity.org

LETTER OF DETERMINATION

Mailing Date: JUN 16 2021

CASE NO. DIR-2018-2002-CDP-MEL-1A

Council District: 11 - Bonin

CEQA: ENV-2018-1990-CE

Plan Area: Venice

Project Site: 701 and 701 ½ East Vernon Avenue

Applicant: Alon Zakoot, 701 Cali, LLC
Representative: Stacy Van Dyke, Alliance Team Realty, Inc.;
Representative: Steve Kaplan, Law Office of Steve Kaplan

Appellant: Joan Huff and Erica Meza, Preserve Venice

At its meeting of **June 2, 2021**, the West Los Angeles Area Planning Commission took the actions below in conjunction with the approval of the following project:

Demolition of one one-story, single-family dwelling with detached garage, subdivision of an existing 5,882 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with roof deck, jacuzzi and swimming pool on each newly subdivided lot with five parking spaces provided.

1. **Determined** that based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15301, 15303, 15315, and 15332, and determine that there is no substantial evidence demonstrating that an exception to the Categorical Exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Denied** the appeal and **sustained** the Director's Determination dated February 17, 2021;
3. **Approved**, pursuant to Section 12.20.2 of the Los Angeles Municipal Code, a Coastal Development Permit for the proposed Project, 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 construction of two Residential Units in the California Coastal Zone;
5. **Adopted** the attached Conditions of Approval as modified by the Commission; and
6. **Adopted** the attached amended Findings.

This action was taken by the following vote:

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

Vote: 3 – 2



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: Modified Conditions of Approval, Amended Findings, Interim Appeal Filing Procedures

c: Juliet Oh, Senior City Planner
Elizabeth Gallardo, City Planner
Sienna Kuo, Planning Assistant

CONDITIONS OF APPROVAL

As modified by the West Los Angeles area Planning Commission on June 2, 2021

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.** Two (2) residential units shall be constructed. One (1) single-family dwelling shall be permitted on each new small lot created pursuant to Parcel Map AA-2018-2001-PMLA-SL and Small Lot Subdivision Ordinance 185,462; the small lot subdivision will result in two (2) Small Lots.
4. **Height.** The project features both flat and varied rooflines; portions of the structure with flat rooflines shall be limited to a height of 25 feet and portions with varied rooflines (slope greater than 2:12) shall be limited to a height of 30 feet; the portions exceeding 25 feet shall be stepped back from the required front yard one foot in depth for every foot in height above 25 feet. Height shall be measured from the midpoint of the centerline of Vernon Avenue.
5. **Parking and Access.** As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide five (5) parking spaces onsite: each single-family dwelling will be designated two spaces and one guest parking space shall be provided. All vehicle access shall be from the rear alley.
6. **Roof Deck.** Railings used on the proposed rooftop deck exceeding the maximum flat roof building height of 25 feet shall be of an open design and limited to a height of 42 inches. Solid glass railings shall be included in the measurement of building height.
7. **Roof Access Structure.** For subareas where there is a specified Flat Roof height limit, Roof Access Structures shall not exceed the Flat Roof height limit by more than ten feet regardless of roof type. The project proposes a roof access structure on each newly subdivided lot with a height of ten feet.
8. **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.
9. **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.
10. This approval is tied to Case No. AA-2018-2001-PMLA-SL. The applicant shall comply with the conditions of approval listed in Case No. AA-2018-2001-PMLA-SL, which are incorporated herein by reference.

11. 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.
12. Outdoor lighting shall be designed and installed with shielding so that light does not overflow into adjacent residential properties.
13. 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.
14. 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.
15. 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.
16. 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

17. **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.
18. **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.
19. **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.
20. **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.

21. **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.
22. **Condition Compliance.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
23. **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.

FINDINGS

As amended by the West Los Angeles Area Planning Commission on June 2, 2021.

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 proposed project consists of the demolition and construction of four dwelling units. The subject site is not located within an area with known Archaeological or Paleontological Resources. However, if such resources are later 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 project site is located in a developed residential neighborhood improved with single and multi-family dwellings. The proposed project can be accommodated by the existing infrastructure and by existing public services. The area surrounding the project is developed with other residential dwellings thereby making the project site contiguous with, and in close proximity to, existing developed areas that are able to accommodate it.

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 project is located within a residential neighborhood zoned RD1.5-1 and is developed with single and multi-family residential structures that are one to three stories in height. There are 40 residential structures in the neighborhood block of Vernon Avenue bound by 7th Avenue and Lincoln Boulevard. Of the 40 structures, one is three stories, 12 are two stories, 27 are one-story structures. The

project is located at the intersection of 7th Avenue and Vernon Avenue. The existing structures adjacent to the intersection are comprised of one-story single-family dwellings. The proposed two-story single-family dwellings provide a 15-foot front yard setback on Vernon Avenue, consistent with the requirements of the RD1.5 zone and further recess portions of the side walls along 7th Avenue to reduce the massing of the structure. The site is located within an area adjacent to a commercial corridor zoned C2-1 that is designated for Community Commercial use and developed with commercial buildings up to three stories in height. The subject site and surrounding areas are relatively flat with no direct views to the Pacific Ocean; no natural landforms will be altered as part of the project. As such, the proposed project will be visually compatible with the character of the surrounding area.

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 one, one-story single-family dwelling unit with detached garage, subdivision of an existing 5,882 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite; two spaces will be provided for each single-family dwelling and one guest parking space will be shared. As conditioned by Case No. AA-2018-2001-PMLA-SL, the project is required to construct a 5-foot wide sidewalk and landscaping on Vernon Avenue and Sunset Court. The project provides sufficient parking for the single-family dwellings and the required improvements to the adjacent right-of-way will enhance and maintain the public access for both vehicles and pedestrians. No permanent structures will be placed within the public-right-of-way and public access to the coast will not be obstructed. As such, the proposed project will not conflict with any public access policies of the Coastal Act.

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 the Calvo Exclusion Area, Liquefaction Zone, and within 4.19 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 project proposes the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing ~~6,342~~ 5,882 square-foot lot into two new small lots, and the construction of a two-story single-family dwellings with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite, located in the Single Permit Jurisdiction area of the Coastal Zone; and have no adverse impacts on public access, recreation, public views, or the marine environment, as the property is located within a developed residential area adjacent to Vernon Avenue. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filing, or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or designate public access views. 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. 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. No roof access structure is proposed. The project is limited to the development of one lot.

Policy I.A.7 outlines density and development standards for areas designated for multi-family dwellings.

Use: Duplexes and multi-family structures are allowed. The project consists of a two-lot small lot subdivision and the construction of a two-story single-family dwelling on each newly created lot. The project will replace a single residential structure with multiple (two) residential structures.

Density: One unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units. The project proposes a density of two units, one new single-family dwelling on each new Small Lot. Parcel A has a lot size of 2,873.1 square-feet and Parcel B has a lot size of 3,009 square-feet. The total net lot area is 5,882 square feet, the project provides a maximum density of two dwelling units.

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. The proposed yards are consistent with existing pattern of development along Vernon Avenue and comply with the requirements of Ordinance No. 185,462.

Height: Building height shall not exceed 25 feet for buildings with roofs or 30 feet for

buildings with a varied roofline (slope greater than 2:12). Any portion that exceeds 25 feet in height shall be setback from the required front yard one foot for every foot in height above 25 feet. The proposed single-family dwellings will have a flat roof height of 24 feet, 4 inches and a varied roofline height of 30 feet.

Policy II.A.3 outlines the Parking Requirements for the project. Pursuant to Z.I. No. 2406, required parking for subdivision projects shall be the parking requirements for multiple dwelling uses, based on the width of the pre-subdivided lot, under Section 13.D of the Venice Coastal Zone Specific Plan. Multiple dwelling projects on lots 35 feet or more in width (if adjacent to an alley) are required to provide two spaces for each dwelling unit and one guest parking space for each four or fewer units. The proposed project provides five (5) parking spaces total: two standard parking space and three compact parking spaces, one of which will serve as a guest parking space. All parking spaces are accessible via the alley.

The proposed project 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. In addition to the Regional Interpretative Guidelines, the policies of Venice Local Coastal Program Land Use Plan (the Land Use Plan was certified by the Coastal Commission on June 14, 2001) have been reviewed and considered.

The project proposes the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,306.2 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with a roof access structure and roof deck on each newly subdivided lot; five (5) parking spaces provided onsite. The Regional Interpretive Guidelines have been reviewed, analyzed, and considered and the proposed project is found to 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 Certified Venice 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 is located in the Single Permit jurisdiction of the Coastal Zone. The City of Los Angeles issues Coastal Development Permits in the Single Permit Jurisdiction, which can be further appealed to the Coastal Commission. The small lot subdivision and new residential structures do not conflict with prior decisions of the Coastal Commission.

- In March 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 for the demolition of a two-story single-family dwelling and accessory structure, subdivision of the lot into two small lots, and the construction of two new two-story single-family dwellings, in the single permit jurisdiction, located at 415 & 417 Sunset Avenue (Appeal No. A-5-VEN-17-0001).
- In December 2016, the Coastal Commission approved the demolition of a duplex and triplex, subdivision to create four residential parcels, and construction of four three-story single-family dwellings, located at 742-748 Brooks Avenue (Application No. A-5-VEN-16-0083).
- In March 2016, 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 for the demolition of a single-family dwelling, a small-lot subdivision of a 4,670 square-foot lot into two lots, and the construction of a new two-story single-family dwelling on each lot, located at 758 Sunset Avenue (Appeal No. A-5-VEN-15-0071).
- In September 2014, 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 for the demolition of two single-family dwellings, a subdivision to create three new lots, and the construction of three new single-family dwellings, located at 644 Sunset Avenue and 607 7th Avenue (Appeal No. A-5-VEN-15-0071).

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 applicable decisions of the Coastal Commission shall guide local governments in their actions in carrying out their responsibility and authority under the California 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 proposed project will neither interfere nor reduce access to the shoreline as the site is not located near any shoreline. The property has no direct access to any water or beach and there will be no dredging, filling, or diking of coastal waters or wetlands. In addition, there are no environmentally sensitive habitat areas or known archaeological or paleontological resources on the site.

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

A Categorical Exemption, ENV-2018-1990-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 an existing single-family dwelling, subdivision of a 6,312 square foot lot into two small lots that are 2,873 square feet (Parcel A) and 3,009 square feet (Parcel B). Parcel A would be developed with a two-story 2,768 square-foot, single-family dwelling with a rooftop deck, roof access structure, and ground-level pool/spa. Parcel B would be developed with a two-story 2,852 square-foot, single-family dwelling with a rooftop deck, roof access structure, ground-level pool/spa, and an attached garage providing two parking spaces for each new dwelling unit and one guest parking space. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class 1), 15303 (Class 3), 15315 (Class 15), and 15332 (Class 32).

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 proposes the demolition of one single-family dwelling and detached garage.

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. In urbanized areas, up to three single-family dwellings may be constructed under this exemption. The proposed project qualifies for a Class 3, categorical exemption because it consists of the construction of one single-family residence on each of the newly subdivided lots.

The Class 15 categorical exemption allows for minor subdivisions in urban areas. A project qualifies for a Class 15 Categorical Exemption if it is a division of property in an urbanized area and meets the six (6) conditions as described in this section. Preliminary Parcel Map No. AA-2018-2001-PMLA-SL satisfies all six conditions and therefore qualifies for the Class 15 Categorical Exemption.

a. *A subdivision of four or fewer parcels.*

The project proposes to subdivide one parcel to create two new parcels.

b. *Conform with the General Plan and Zoning.*

The site currently is developed with one, one-story single-family dwelling. The site is zoned RD1.5-1 and has a General Plan Land Use Designation of Low Medium II Residential. The project proposes the construction of two single-family dwellings on two new lots and is in conformance with the General Plan and Zoning designation.

c. *Require no variances or exceptions.*

No variances or exceptions are requested or required as part of this project.

d. *Have all services and access available per local standards.*

The project site will be adequately served by all public utilities and services given that the property is located in an urban tract with water supply, sewage and waste disposal infrastructure, and power lines installed. Vernon Avenue and the abutting alley are improved streets with existing utilities and infrastructure to serve residences in the area. The street and alley are accessible to emergency vehicles. Since there is a minor net gain in the number of units on the subject site, no significant increase in population or density is anticipated. There will be no significant impact on the capacity of existing utilities and services.

e. *Must not be involved in a division of a larger parcel within the last two years.*

There is no record of any previous subdivisions in the last two years on record for the subject site.

f. *Must not have a slope greater than 20 percent.*

No slope greater than 20% is indicated on the parcel map or topographic survey.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria:

a. *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.*

The site currently is developed with two, one-story single-family dwellings. The site

is zoned RD1.5-1 and has a General Plan Land Use Designation of Low Medium II Residential. Since the project is for the construction of two new single-family dwellings, the project is in conformance with the General Plan and Zoning designation.

- b. ***The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.***

The site - located at 701 and 701 ½ East Vernon Avenue - is wholly within the City of Los Angeles. Lots surrounding the subject site are developed with single-family and multi-family dwellings.

- c. ***The project site has no value as habitat for endangered, rare or threatened species.***

The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species. The area around the site is urbanized and surrounded by residential use. NavigateLA shows that the subject site is not located in a Significant Ecological Area.

- d. ***Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.***

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will reduce any potential impacts on noise and water quality to less than significant. The creation of noise is limited to certain decibels, restricted to specific hours. The proposed project is not adjacent to any water sources and does not involve excavations that may have an impact on the water table. The project will not result in a gain or loss of residential units, therefore, impacts to public services and air quality are deemed insignificant. Traffic congestion will not be impacted by the project; the number of trips generated by the development will not result in a net increase because the area's density and population will not change significantly. Likewise, air quality will not worsen as a result of the proposed project.

- e. ***The site can be adequately served by all required utilities and public services.***

The project site will be adequately served by all public utilities and services given that the property is located in an urban tract with water supply, water treatment, sewage and waste disposal infrastructure, and power lines. Vernon Avenue and the abutting alley are improved streets with existing utilities that service the various other dwellings in the area. The street and alley are accessible to emergency vehicles. The project will not result in a gain or loss of residential units, therefore, there will be no significant increase in population or density is anticipated. As such, no significant impact on the capacity of existing utilities and services is anticipated.

Further, 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. The subject property and its surrounding residential neighborhood are 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 lots zoned RD1.5-1 and Low Medium II Residential land use designation. The proposed construction of two dwelling units will not exceed thresholds identified for impacts to the area (i.e. traffic, noise, etc.) and 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 proposed project consists of work typical in a residential neighborhood and, as such, 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 structure 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). A Historical Resources Assessment was prepared by Sapphos Environmental dated June 23, 2020. The report found that the buildings do not appear to be individually eligible for listing in the National Register, the California Register, or as an HCM and would not contribute to a potential HPOZ. This property was constructed early in the 20th century but does not possess significant association with the movement. In addition, this project property falls within the boundaries of the Oakwood Planning District, but no information was found to suggest the subject property has a significant association with the African American community. The Office of Historic Resources (OHR) reviewed the report and concurred with the findings, that the existing structure is not eligible for designation on the California or National Register of Historic Places, nor as an HCM.

The project is determined to be categorically exempt and does not require mitigation or monitoring measures; no alternatives of the project were evaluated. An appropriate environmental clearance has been granted.

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

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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 located on a 5,882 square-foot lot in the Venice Coastal Zone. A Determination issued by the Los Angeles Housing and Community Investment Department (HCIDLA) dated May 7, 2018 states that the property currently maintains a single-family dwelling with three bedrooms. HCIDLA collected data from April 2015 through April 2018, utilizing data provided by the current owners. HCIDLA was provided with tax bills dated from 2013 to 2016, which showed the homeowners exemption was taken. The owners also provided utility bills from the Department of Water and Power (DWP), which showed little to no usage. Based on documents provided and research conducted by HCIDLA, the previous owner had occupied the property as their primary residence within the last three (3) years. Therefore, no Affordable Existing Residential Units are proposed for demolition or conversion; and the applicant is not required to provide any Affordable Replacement Units.

FINDINGS

As amended by the West Los Angeles Area Planning Commission on June 2, 2021.

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 proposed project consists of the demolition and construction of four dwelling units. The subject site is not located within an area with known Archaeological or Paleontological Resources. However, if such resources are later 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 project site is located in a developed residential neighborhood improved with single and multi-family dwellings. The proposed project can be accommodated by the existing infrastructure and by existing public services. The area surrounding the project is developed with other residential dwellings thereby making the project site contiguous with, and in close proximity to, existing developed areas that are able to accommodate it.

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 project is located within a residential neighborhood zoned RD1.5-1 and is developed with single and multi-family residential structures that are one to three stories in height. There are 40 residential structures in the neighborhood block of Vernon Avenue bound by 7th Avenue and Lincoln Boulevard. Of the 40 structures, one is three stories, 12 are two stories, 27 are one-story structures. The

project is located at the intersection of 7th Avenue and Vernon Avenue. The existing structures adjacent to the intersection are comprised of one-story single-family dwellings. The proposed two-story single-family dwellings provide a 15-foot front yard setback on Vernon Avenue, consistent with the requirements of the RD1.5 zone and further recess portions of the side walls along 7th Avenue to reduce the massing of the structure. The site is located within an area adjacent to a commercial corridor zoned C2-1 that is designated for Community Commercial use and developed with commercial buildings up to three stories in height. The subject site and surrounding areas are relatively flat with no direct views to the Pacific Ocean; no natural landforms will be altered as part of the project. As such, the proposed project will be visually compatible with the character of the surrounding area.

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 one, one-story single-family dwelling unit with detached garage, subdivision of an existing 5,882 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite; two spaces will be provided for each single-family dwelling and one guest parking space will be shared. As conditioned by Case No. AA-2018-2001-PMLA-SL, the project is required to construct a 5-foot wide sidewalk and landscaping on Vernon Avenue and Sunset Court. The project provides sufficient parking for the single-family dwellings and the required improvements to the adjacent right-of-way will enhance and maintain the public access for both vehicles and pedestrians. No permanent structures will be placed within the public-right-of-way and public access to the coast will not be obstructed. As such, the proposed project will not conflict with any public access policies of the Coastal Act.

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 the Calvo Exclusion Area, Liquefaction Zone, and within 4.19 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 project proposes the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing ~~6,342~~ 5,882 square-foot lot into two new small lots, and the construction of a two-story single-family dwellings with roof deck on each newly subdivided lot, jacuzzi, swimming pool, five (5) parking spaces provided onsite, located in the Single Permit Jurisdiction area of the Coastal Zone; and have no adverse impacts on public access, recreation, public views, or the marine environment, as the property is located within a developed residential area adjacent to Vernon Avenue. 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 designate public access views. 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. 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. No roof access structure is proposed. The project is limited to the development of one lot.

Policy I.A.7 outlines density and development standards for areas designated for multi-family dwellings.

Use: Duplexes and multi-family structures are allowed. The project consists of a two-lot small lot subdivision and the construction of a two-story single-family dwelling on each newly created lot. The project will replace a single residential structure with multiple (two) residential structures.

Density: One unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units. The project proposes a density of two units, one new single-family dwelling on each new Small Lot. Parcel A has a lot size of 2,873.1 square-feet and Parcel B has a lot size of 3,009 square-feet. The total net lot area is 5,882 square feet, the project provides a maximum density of two dwelling units.

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. The proposed yards are consistent with existing pattern of development along Vernon Avenue and comply with the requirements of Ordinance No. 185,462.

Height: Building height shall not exceed 25 feet for buildings with roofs or 30 feet for

buildings with a varied roofline (slope greater than 2:12). Any portion that exceeds 25 feet in height shall be setback from the required front yard one foot for every foot in height above 25 feet. The proposed single-family dwellings will have a flat roof height of 24 feet, 4 inches and a varied roofline height of 30 feet.

Policy II.A.3 outlines the Parking Requirements for the project. Pursuant to Z.I. No. 2406, required parking for subdivision projects shall be the parking requirements for multiple dwelling uses, based on the width of the pre-subdivided lot, under Section 13.D of the Venice Coastal Zone Specific Plan. Multiple dwelling projects on lots 35 feet or more in width (if adjacent to an alley) are required to provide two spaces for each dwelling unit and one guest parking space for each four or fewer units. The proposed project provides five (5) parking spaces total: two standard parking space and three compact parking spaces, one of which will serve as a guest parking space. All parking spaces are accessible via the alley.

The proposed project 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. In addition to the Regional Interpretative Guidelines, the policies of Venice Local Coastal Program Land Use Plan (the Land Use Plan was certified by the Coastal Commission on June 14, 2001) have been reviewed and considered.

The project proposes the demolition of one, one-story single-family dwelling unit with detached garage, subdivision of an existing 6,306.2 square-foot lot into two new small lots, and the construction of a two-story single-family dwelling with a roof access structure and roof deck on each newly subdivided lot; five (5) parking spaces provided onsite. The Regional Interpretive Guidelines have been reviewed, analyzed, and considered and the proposed project is found to 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 Certified Venice 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 is located in the Single Permit jurisdiction of the Coastal Zone. The City of Los Angeles issues Coastal Development Permits in the Single Permit Jurisdiction, which can be further appealed to the Coastal Commission. The small lot subdivision and new residential structures do not conflict with prior decisions of the Coastal Commission.

- In March 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 for the demolition of a two-story single-family dwelling and accessory structure, subdivision of the lot into two small lots, and the construction of two new two-story single-family dwellings, in the single permit jurisdiction, located at 415 & 417 Sunset Avenue (Appeal No. A-5-VEN-17-0001).
- In December 2016, the Coastal Commission approved the demolition of a duplex and triplex, subdivision to create four residential parcels, and construction of four three-story single-family dwellings, located at 742-748 Brooks Avenue (Application No. A-5-VEN-16-0083).
- In March 2016, 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 for the demolition of a single-family dwelling, a small-lot subdivision of a 4,670 square-foot lot into two lots, and the construction of a new two-story single-family dwelling on each lot, located at 758 Sunset Avenue (Appeal No. A-5-VEN-15-0071).
- In September 2014, 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 for the demolition of two single-family dwellings, a subdivision to create three new lots, and the construction of three new single-family dwellings, located at 644 Sunset Avenue and 607 7th Avenue (Appeal No. A-5-VEN-15-0071).

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 applicable decisions of the Coastal Commission shall guide local governments in their actions in carrying out their responsibility and authority under the California 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 proposed project will neither interfere nor reduce access to the shoreline as the site is not located near any shoreline. The property has no direct access to any water or beach and there will be no dredging, filling, or diking of coastal waters or wetlands. In addition, there are no environmentally sensitive habitat areas or known archaeological or paleontological resources on the site.

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

A Categorical Exemption, ENV-2018-1990-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 an existing single-family dwelling, subdivision of a 6,312 square foot lot into two small lots that are 2,873 square feet (Parcel A) and 3,009 square feet (Parcel B). Parcel A would be developed with a two-story 2,768 square-foot, single-family dwelling with a rooftop deck, roof access structure, and ground-level pool/spa. Parcel B would be developed with a two-story 2,852 square-foot, single-family dwelling with a rooftop deck, roof access structure, ground-level pool/spa, and an attached garage providing two parking spaces for each new dwelling unit and one guest parking space. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class 1), 15303 (Class 3), 15315 (Class 15), and 15332 (Class 32).

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 proposes the demolition of one single-family dwelling and detached garage.

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. In urbanized areas, up to three single-family dwellings may be constructed under this exemption. The proposed project qualifies for a Class 3, categorical exemption because it consists of the construction of one single-family residence on each of the newly subdivided lots.

The Class 15 categorical exemption allows for minor subdivisions in urban areas. A project qualifies for a Class 15 Categorical Exemption if it is a division of property in an urbanized area and meets the six (6) conditions as described in this section. Preliminary Parcel Map No. AA-2018-2001-PMLA-SL satisfies all six conditions and therefore qualifies for the Class 15 Categorical Exemption.

a. *A subdivision of four or fewer parcels.*

The project proposes to subdivide one parcel to create two new parcels.

b. *Conform with the General Plan and Zoning.*

The site currently is developed with one, one-story single-family dwelling. The site is zoned RD1.5-1 and has a General Plan Land Use Designation of Low Medium II Residential. The project proposes the construction of two single-family dwellings on two new lots and is in conformance with the General Plan and Zoning designation.

c. *Require no variances or exceptions.*

No variances or exceptions are requested or required as part of this project.

d. *Have all services and access available per local standards.*

The project site will be adequately served by all public utilities and services given that the property is located in an urban tract with water supply, sewage and waste disposal infrastructure, and power lines installed. Vernon Avenue and the abutting alley are improved streets with existing utilities and infrastructure to serve residences in the area. The street and alley are accessible to emergency vehicles. Since there is a minor net gain in the number of units on the subject site, no significant increase in population or density is anticipated. There will be no significant impact on the capacity of existing utilities and services.

e. *Must not be involved in a division of a larger parcel within the last two years.*

There is no record of any previous subdivisions in the last two years on record for the subject site.

f. *Must not have a slope greater than 20 percent.*

No slope greater than 20% is indicated on the parcel map or topographic survey.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria:

a. *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.*

The site currently is developed with two, one-story single-family dwellings. The site

is zoned RD1.5-1 and has a General Plan Land Use Designation of Low Medium II Residential. Since the project is for the construction of two new single-family dwellings, the project is in conformance with the General Plan and Zoning designation.

- b. ***The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.***

The site - located at 701 and 701 ½ East Vernon Avenue - is wholly within the City of Los Angeles. Lots surrounding the subject site are developed with single-family and multi-family dwellings.

- c. ***The project site has no value as habitat for endangered, rare or threatened species.***

The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species. The area around the site is urbanized and surrounded by residential use. NavigateLA shows that the subject site is not located in a Significant Ecological Area.

- d. ***Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.***

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will reduce any potential impacts on noise and water quality to less than significant. The creation of noise is limited to certain decibels, restricted to specific hours. The proposed project is not adjacent to any water sources and does not involve excavations that may have an impact on the water table. The project will not result in a gain or loss of residential units, therefore, impacts to public services and air quality are deemed insignificant. Traffic congestion will not be impacted by the project; the number of trips generated by the development will not result in a net increase because the area's density and population will not change significantly. Likewise, air quality will not worsen as a result of the proposed project.

- e. ***The site can be adequately served by all required utilities and public services.***

The project site will be adequately served by all public utilities and services given that the property is located in an urban tract with water supply, water treatment, sewage and waste disposal infrastructure, and power lines. Vernon Avenue and the abutting alley are improved streets with existing utilities that service the various other dwellings in the area. The street and alley are accessible to emergency vehicles. The project will not result in a gain or loss of residential units, therefore, there will be no significant increase in population or density is anticipated. As such, no significant impact on the capacity of existing utilities and services is anticipated.

Further, 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. The subject property and its surrounding residential neighborhood are 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 lots zoned RD1.5-1 and Low Medium II Residential land use designation. The proposed construction of two dwelling units will not exceed thresholds identified for impacts to the area (i.e. traffic, noise, etc.) and 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 proposed project consists of work typical in a residential neighborhood and, as such, 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 structure 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). A Historical Resources Assessment was prepared by Sapphos Environmental dated June 23, 2020. The report found that the buildings do not appear to be individually eligible for listing in the National Register, the California Register, or as an HCM and would not contribute to a potential HPOZ. This property was constructed early in the 20th century but does not possess significant association with the movement. In addition, this project property falls within the boundaries of the Oakwood Planning District, but no information was found to suggest the subject property has a significant association with the African American community. The Office of Historic Resources (OHR) reviewed the report and concurred with the findings, that the existing structure is not eligible for designation on the California or National Register of Historic Places, nor as an HCM.

The project is determined to be categorically exempt and does not require mitigation or monitoring measures; no alternatives of the project were evaluated. An appropriate environmental clearance has been granted.

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

California Coastal Commission
A-5-VEN-21-0051

Exhibit 4
Page 25 of 27

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 located on a 5,882 square-foot lot in the Venice Coastal Zone. A Determination issued by the Los Angeles Housing and Community Investment Department (HCIDLA) dated May 7, 2018 states that the property currently maintains a single-family dwelling with three bedrooms. HCIDLA collected data from April 2015 through April 2018, utilizing data provided by the current owners. HCIDLA was provided with tax bills dated from 2013 to 2016, which showed the homeowners exemption was taken. The owners also provided utility bills from the Department of Water and Power (DWP), which showed little to no usage. Based on documents provided and research conducted by HCIDLA, the previous owner had occupied the property as their primary residence within the last three (3) years. Therefore, no Affordable Existing Residential Units are proposed for demolition or conversion; and the applicant is not required to provide any Affordable Replacement Units.

COVID-19 UPDATE

Interim Appeal Filing Procedures

Fall 2020



Consistent with Mayor Eric Garcetti's "Safer At Home" directives to help slow the spread of COVID-19, City Planning has implemented new procedures for the filing of appeals for non-applicants that eliminate or minimize in-person interaction.

OPTION 1: Online Appeal Portal

(planning.lacity.org/development-services/appeal-application-online)

Entitlement and CEQA appeals can be submitted online and payment can be made by credit card or e-check. The online appeal portal allows appellants to fill out and submit the appeal application directly to the Development Services Center (DSC). Once the appeal is accepted, the portal allows for appellants to submit a credit card payment, enabling the appeal and payment to be submitted entirely electronically. A 2.7% credit card processing service fee will be charged - there is no charge for paying online by e-check. Appeals should be filed early to ensure DSC staff has adequate time to review and accept the documents, and to allow Appellants time to submit payment. On the final day to file an appeal, the application must be submitted and paid for by 4:30PM (PT). Should the final day fall on a weekend or legal holiday, the time for filing an appeal shall be extended to 4:30PM (PT) on the next succeeding working day. Building and Safety appeals (LAMC Section 12.26K) can only be filed using Option 2 below.

OPTION 2: Drop off at DSC

An appellant may continue to submit an appeal application and payment at any of the three Development Services Center (DSC) locations. City Planning established drop off areas at the DSCs with physical boxes where appellants can drop.

Metro DSC

(213) 482-7077
201 N. Figueroa Street
Los Angeles, CA 90012

Van Nuys DSC

(818) 374-5050
6262 Van Nuys Boulevard
Van Nuys, CA 91401

West Los Angeles DSC

(310) 231-2901
1828 Sawtelle Boulevard
West Los Angeles, CA 90025

City Planning staff will follow up with the Appellant via email and/or phone to:

- Confirm that the appeal package is complete and meets the applicable LAMC provisions
- Provide a receipt for payment

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: A-5-VEN-21-0051Date Filed: 7/19/2021Appellant Name(s): Karen Jones**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 North Coast district office, the email address is 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 5

5. 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., 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

6. Appellant certifications

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

Karen Jones

Print name _____

Signature _____

Date of Signature _____

7/19/21

7-19-21

7. Representative authorizations

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.

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

6 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

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Exhibit 5

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CALIFORNIA COASTAL COMMISSION

1 STREET, SUITE 300
O, CA 94105-2219
04-5200
-5400



DISCLOSURE OF REPRESENTATIVES

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 karen Jones

CDP Application or Appeal Number DIA-2018-2002-CDP-MEL-1A

Lead Representative

Name David Hertz Architects, Inc.
Title Architect
Street Address 57 Market Street
City Venice,
State, Zip CA. 90291
Email Address hertz@studioea.com
Daytime Phone 310-383-7013

Your Signature Karen Jones

Date of Signature 7-19-21

4. GROUNDS FOR THIS APPEAL- DIR-20108-2002-CDP-MEL-1A

701-701 ½ Vernon Ave, Venice

5-VEN-21-0043

Introduction:

This project is a small lot subdivision and construction of two very large spec houses, each with a pool, where a beautiful 1922 bungalow now sits on the corner of Vernon Ave and 7th Ave.

The appellants are a small group of long-term residents in the Oakwood community, some dating back to direct ancestry of Irving Tabor, the chauffeur and close confidant of Abbot Kinney. We are very concerned with this project in particular--a small lot subdivision that seeks to remove a quaint, home on the corner of Vernon and 7th that represents the historic character of our community. We have witnessed the demolition approved over the years that has allowed the destruction of Oakwood homes by speculation and over development.

Preserving a 1922 historic bungalow on a particularly important and visible corner of the Oakwood neighborhood of Venice, a neighborhood of important historic significance, is of the upmost importance in preserving and protecting the community character of the Special Coastal Community of Venice, a coastal resource, which, among other things, is defined by its historic and cultural architecture.

This area of Venice still retains the character, mass and scale of the original Venice. **All of the immediately abutting and adjacent properties and surrounding neighbors are in similarly one story small-scaled historic bungalows** in this important older era.

The city erred when it used the entirety of Vernon street to Lincoln to justify "character mass and scale", this is too large a range in which to view the immediate character which forms an intersection of one story bungalows on 7th and continues in each direction for a majority of 7th Street to form the one story character mass and scale of the community on 7th, which is characterized by houses of a similar style and scale to the subject property. Using a larger radius from Lincoln to 7th on Vernon, which has been already over developed skews the results. This is a perfect example of cumulative impacts creating an exponential and disproportional skew towards making a case for larger structures, with each larger structure approved, thus the continued elimination of contributing character for smaller structures. Even then, according to the Letter of Determination: "Of the 40 structures, one is three stories, 12 are two stories, 27 are one-story structures."

Accordingly, the majority of the houses that define the mass scale and character of this area surveyed by over two times, greater are single story houses than two story houses.

From the LOD.

The project is located at the intersection of 7th Avenue and Vernon Avenue. The existing structures adjacent to the intersection are comprised of one-story single-family dwellings."

Here the City does acknowledge the intersection is all one- story residences but fails to give appropriate weight to the importance of the intersection on the pedestrian experience.

Regarding appropriate setbacks consistent with the character mass and scale along 7th Street the City failed to appropriately address the existing streetscape and the fact that a majority of the single family homes on 7th have rear yards as is required in the zone. This 15' buffer off the alleys preserve open space, natural light and natural ventilation. The Small lot subdivision obliterates the proportioning in favor of a continued largely uninterrupted plane which on an end lot, has the unintended consequence of creating much more bulk and massing than would otherwise be allowed.

"The proposed two-story single-family dwellings provide a 15-foot front yard setback on Vernon Avenue, consistent with the requirements of the RD1.5 zone and further recess portions of the side walls along 7th Avenue to reduce the massing of the structure."



Existing one story bungalows on 7th Ave and Vernon

701 E VERNON AVENUE, VENICE, CA 90291

APN: 4240-016-076 | Lots 49 of Block None, Tract 1694

702 Sunset Ct



(Proposed Conceptual Rendering Only)

701 Vernon Ave



(Proposed Conceptual Rendering Only)

The appellants are concerned that this project seeks to demolish this existing single-family home, which is clearly an historic contributor (even if not actually determined to be historic in the official historic contributor survey, meeting the contributor criteria of SurveyLA, as explained below). This project would have significant negative effects by not maintaining a structure that

represent the character of Venice's history, especially on a prominent public corner such as this. 7th Avenue is a major N/S road thoroughfare.

Venice continues to be challenged by new spec development, which is changing the scale and character of the Oakwood neighborhood in particular, which is being developed with larger spec homes similar to the one proposed. Venice is a community that has been able to maintain its character somewhat, by having a mix of existing smaller scale homes next to new projects with varied styles of architecture that maintain the neighborhood scale and massing (as per certified LUP Policy I.E.3.). However, that character becomes ultimately lost when most every new home seems to be a new spec home that seeks to maximize square footage and is built in a similar excessive and incompatible size as this project.

Ultimately, we are at risk of destroying the character that makes Venice so unique and different from the mostly homogenous architecture elsewhere. The law requires the protection of Venice's character, and the city and Coastal Commission are responsible for making sure it is protected.

Mass, Scale and Character:

This project does not meet the requirement in the certified Venice Land Use Plan for compatibility with the mass, scale and character of the surrounding neighborhood as the project as proposed is not visually compatible with the mass, scale and character of this surrounding area. The proposed project is inconsistent with the existing pattern of development along 7th, both in sheer size and in subdivision pattern, and was only considered in the context of Vernon. The block is described as predominately single-story bungalows. The proposed development's size (6,008 square feet) is almost FOUR TIMES the average of the corner lots (1,541 square feet) as well as of the first 10 lots (both north and south sides of the street, averaging 1,603 square feet). No homes were built after 1957. Five were built before 1927 when Venice's annexation was complete. The existing homes at the intersection of Vernon and 7th are all one-story bungalow scale homes. The project is inconsistent with the immediate massing of the small one-story bungalows on all four corners of Vernon and 7th and especially along much of 7th. The massing of the project, including the stairwell proposed on the plans, is not setback from 7th street and provides for an unarticulated continuous height of 35'. The nontransparent handrails increase the massing along 7th even more.

The massing on 7th Ave in particular is inconsistent with other adjacent developments and will create a significant change to the mass, scale and character of this neighborhood that is most visually apparent on a corner lot where the massing along the length of the property is more public facing than an interior record lot. The certified Land use Plan recognizes the importance of the existing pedestrian scale residential neighborhoods and the need to conserve them. Therefore, new structures should be sited and articulated to respect a pedestrian scale while also maintaining visual compatibility with the surrounding neighborhood. The city's analysis did not take into consideration that the proposed development is located on a large corner lot that would be highly visible to pedestrians along both Vernon and 7th Avenues whereas the massing of homes in the middle of a block would be more hidden. In this case, the development lacks articulation and is not stepped back. In fact, the portion of the development that rises to the maximum height is at the most visible corner location. Taking into consideration the combination

of the visibility of the larger corner lot and the bulky frontage of the development, the home would appear to be very large compared to other homes in the neighborhood and is, thus, inconsistent with the character of the surrounding development in this regard. While the City did provide some analysis regarding the character and scale of the proposed home within the existing neighborhood, the city was remiss in failing to factor in the home's visual impact given that it is situated on a corner lot. This lack of articulation and excessive bulk, if implemented on future projects, has the potential to adversely impact community character. Therefore, the mass of the home is not compatible with the mass, scale and character of the area and violates LUP Policies I.E.2 and I.E.3 and the Chapter 3 policies of the Coastal Act.

In addition, this project, a modern two-story glass spec house, would set a precedent to allow more of this kind of building and the loss of the homes with character-defining features, causing an adverse cumulative impact. Lastly, the privacy and peaceful enjoyment of adjacent properties and the use of their open rear yards are compromised by the proposed roof deck locations. At a minimum the roof decks must be placed closer to 7th and away from the immediate neighboring properties and back yards to the north and east sides and moved towards the southwest and Vernon and 7th towards the public streets.

Historic Resources:

Venice is a Special Coastal Community, defined in the certified LUP as:

"An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast."

Certified LUP Policy I.E.1. requires protection and preservation of the Special Coastal Community of Venice. As such, its historic architecture and culture ***must*** be protected. This particular parcel with the existing home, which is in very good condition and which is a particularly good example of a craftsman bungalow, should be considered for preservation, especially **as corner lots have more cumulative impact than do interior record lots**, in the way in which the side elevation changes the character and the significant impacts that the longitudinal elevation has on the neighborhood.

In the city's determination, the difference between an historic resource and a contributor is misinterpreted. This difference must be correctly applied to avoid a loss of character-defining structures and an adverse cumulative effect on community character. A contributor may not be eligible for an historic cultural monument classification but its role in determining character of a neighborhood is important and even crucial to recognize. Unfortunately, Oakwood is not considered by SurveyLA to be an Historic District but rather a Planning District, although that could change as we have been told that a re-survey of Venice and consideration of Oakwood as an Historic District will be part of the Venice Community Plan and LCP process. We understand that the city and the Commission are looking into this, and during the recent Listening Sessions held by the Coastal Commission with members of the Venice community most of the questions put to the groups focused on the Oakwood neighborhood.

However, because Oakwood was not originally considered an Historic District, during the SurveyLA inventory a house-by-house inventory was not performed in the Oakwood neighborhood. However, by definition, a Planning District is to use the same planning tools to

assess whether a home would be a contributor and the same considerations are to be applied in the design of a remodel. **A contributor is not to be demolished for purposes of non-characteristic new development.** Given the standards of SurveyLA, this structure would have merited the designation as a contributor if it had been surveyed. In a Planning District a Venice property is to be considered in the same way a contributor in an Historic District would be:

“Planning Districts are geographically defined areas that do not meet eligibility standards for designation but that merit consideration in local planning. These areas generally have consistent planning concepts and features such as height, massing, setbacks, and street trees. The determination is used to inform the Community Plans and other policy documents....” (*Field Survey Results Master Report*. Department of City Planning, Office of Historic Resources, p9.)

Oakwood as an Historical District will likely be considered in the new survey; however, losing these characteristic homes such as the existing home at 701 Vernon Ave diminishes the Oakwood neighborhood's eligibility to be redesignated an Historic District as the designation depends on a critical count of how many homes do define its character!

Cumulative Impact is defined by Coastal Act Section 30105.5 as the 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. Here we have an obvious probable negative impact of future projects that will use this project as a precedent. We have been before you and the city too many times seeing these defining homes be destroyed. There are several other current projects coming through the planning system that intend to do the same thing. And it is very highly probable that there will be more similar projects down the pike if this one is approved. This is an onslaught. It must end.

The OHR report does not accurately reflect the importance of the existing residences in the context of the immediate neighborhood and mass scale and character as required by the Coastal Act, nor does it consider the importance of this obviously historic, 99-year old home to the community in accordance with CEQA. The local conditions and individual project parameters don't take into consideration the cumulative impacts on the coastal resource of the historic Oakwood section of Venice as well as the important social equity issues that should be considered. **The property is a potential contributor to a future historical area and has a significant association with the African American community** and there have been recent discoveries with regards to even more existing residential structures that would qualify as contributors that were not contemplated in the OHR report. The city's findings do not take into consideration the significant adverse cumulative effect on the coastal resource of the historic Oakwood section of Venice. The city's Office of Historic Resources (OHR) and the CDP decision maker erred in permitting this demolition.

The demolition of this property would prejudice the writing of the LCP. The impact that losing this probable contributor has on the Oakwood Planning District neighborhood must be carefully considered. See also remarks at Exhibit B explaining this issue in more detail.

Significant Adverse Cumulative Effect:

Coastal Act Section 30250 requires consideration of the cumulative effects of the project. As defined in the Coastal Act, cumulative effect means the 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. The city did not consider the cumulative effect of this project in its findings, which is an error and abuse of discretion.

We are very concerned about the adverse cumulative effect of the loss of existing homes, especially those on corners, as they have a large exposure. This immediate area is made up of small bungalows on all sides and the insertion of a maxed-out box will forever alter the character of the neighborhood due to the loss of a potential contributing existing house, especially given its prominent corner location and in the context of primarily one-story bungalows of contributing character. This project as proposed and if allowed, would forever change this area and cumulatively contribute to an overall loss of the smaller bungalows that represent the character of the Oakwood community specifically and the character of Venice in general. This Project is wholly inconsistent with the existing mass scale and character of the immediate neighborhood, which is largely defined as one story bungalows on all corners of the intersection at 7th and Vernon.

Many such proposed small lot subdivision projects have been summarily rejected by not only the Venice Neighborhood Council but by the Council Office and on appeal with the West L.A. Area Planning Commission and the Coastal Commission. This is because small lot subdivision projects are typically substantially incompatible with the mass, scale and character of the area and significantly change the subdivision pattern of the neighborhood. This project seeks to maximize the size to an extent that is clearly materially different than the existing mass and scale in the surrounding area, with not only the immediately surrounding homes that comprise small bungalows, but also because of its prominence on 7th street which changes the mass, scale and character and eclipses some of the few remaining low-scale bungalows on this highly visible intersection. Allowing this project, considering the effects of past similar projects, the effects of other similar current projects, and the effects of probable similar future projects, would not only completely change the subdivision pattern and scale of the neighborhood, but it would also have the cumulative impact of changing the character of this multi-family coastal land use designation into a single-family neighborhood. This also violates the certified LUP policies for protection of Venice's social diversity (I.E.1.).

Environmental Justice:

The impact of such oversized projects such as this spec project, for which the sales price is enhanced by maximizing square footage (at the expense of community character), perpetuates the change from an important, historical African American enclave to an enclave for the rich, which is a significant social equity and environmental justice issue.

In addition, the Mello Act determination is not accurate. There are inconsistencies within the city's determination that pertain to the number of existing units. Page 14 of the City's determination states that "The site currently is developed with two, one-story single-family dwellings..." The property has two addresses, 701 and 701 ½ Vernon Ave. This should have resulted in City Planning further investigating the use of the property as two rental units, but they did not. Although it appears that the developer is living there now, as the neighbors can attest, during the Mello lookback period the owners were renting out two units of the property although they claimed it as vacant for purposes of the Mello determination of replacement affordable

units. There is a front house and a rear unit, and both units have continued to be occupied and were also previously rented as affordable units by the prior owners over the last 3 years as the neighbors have testified. In addition, there has been recent illegal short term rental usage on this property. All of this was overlooked by the city in its quest to support these two luxury homes in this multi-family residential zone.

The Coastal Commission's Environmental Justice Policy (Housing page 8) states that "The Commission will also support measures that protect existing affordable housing. If the Commission staff determines that existing affordable housing would be eliminated as part of a proposed project in violation of another state or federal law, the Commission staff will use its discretion to contact the appropriate agency to attempt to resolve the issue." We request that Commission Staff contact City Planning to request that the correct facts be used in determining the Mello Act-required replacement of affordable units on the existing property.

Summary:

The Commission's standard of review for determining whether to hear the appeal is whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code §30625(b)(1); 14 C.C.R. § 13321. Only with a careful review of the city-approved project can the Commission ensure that community character is preserved and visual resources are protected. If the Commission finds that a substantial issue exists, the Commission will have the opportunity to review and act on the project at the subsequent de novo hearing. Applying the five factors shows that the appeal raises "a substantial issue" with respect to Chapter 3 of the Coastal Act, and therefore, does meet the substantiality standard of Section 30265(b)(1).

The first factor is the degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. While the City found that the project would be consistent with the community character of the area and with Sections 30250, 30251, and 30253 of the Coastal Act, the City's findings for the community character analysis were conclusory and did not have adequate support or a logical conclusion for such a determination. The project, as approved by the City, is not consistent with LUP Policies I.E.1., I.E.2 and I.E.3; thus, as approved by the City, the project would prejudice the City's ability to prepare an LCP that conforms with Chapter 3 of the Coastal Act. In addition, the City erred in allowing several violations of the City codes that are in place in order to protect the neighborhood's mass, scale and character as required by Coastal Act Sections 30251 and 20353 and certified Land Use Plan Policies I.E.1, I.E.2. and I.E.3. See specific list in Exhibit A. Therefore, the City did not provide an adequate degree of factual and legal support for its decision.

The second factor is the extent and scope of the development as approved or denied by the local government. The existing development is a 1,380 square foot single-family home with detached garage. The city-approved development authorizes the demolition of the structure, subdivision of the lot, and construction of two homes. The scope is greater than that of the surrounding development, which is comprised primarily of one-story single-family homes (68% as per the City's findings). The locally approved project would have adverse impacts to visual resources and community character. At 6,008 square feet, the scope of the two homes would be far more massive than any other development on the subject block and OVER FOUR times the size of the existing structure.

The third factor is the significance of the coastal resources affected by the decision. The city-approved project, and others like it that could be approved in the future, would adversely affect the character of the Oakwood neighborhood of Venice, which is a unique coastal community, because it is not consistent with the surrounding development pattern. Venice's unique community character is a significant coastal resource. As described above, the city-approved development will have an adverse visual impact to the pedestrian scale of this area of Venice. Therefore, the city-approved development will have a significant impact on coastal resources, inconsistent with Coastal Act Sections 30250, 30251, and 30253.

The fourth factor is the precedential value of the local government's decision for future interpretations of its Local Coastal Program (LCP). The city does not currently have a certified LCP but it does have a certified Land Use Plan. The City-approved development is not consistent with the residential building standards and the policies related to mass, scale, character, and architectural diversity as set forth in the certified Land Use Plan policies I.E.1, I.E.2. and I.E.3. Approval of a project that is not consistent with the standards of the Land Use Plan would set a precedent for other projects that are not consistent with the Land Use Plan and would prejudice the City's ability to prepare a Chapter 3 compliant certified LCP for Venice. Thus, the project, as approved, does raise a substantial issue about the project's consistency with the certified LUP, and by extension, the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that the city-approved development will have a significant adverse impact on future interpretations of its LUP.

The fifth factor is whether the appeal raises local issues, or those of regional or statewide significance. Impacts to coastal resources, including community character, are important statewide issues. The City-approved development is inconsistent with various policies of the certified LUP and with Chapter 3 of the Coastal Act. This appeal raises specific local issues, but Venice is one of the most popular visitor destinations in the state, making its preservation as a Special Coastal Community with a unique character a statewide issue. Therefore, the City's approval does raise issues of statewide significance.

Conclusion:

The primary issue for the appeal is potential adverse cumulative impacts to visual resources and community character. The City-approved project is not in conformity with the Chapter 3 policies of the Coastal Act and, therefore, the appeal raises a substantial issue as to consistency and conformity with the Chapter 3 policies of the Coastal Act. In addition, the decision is likely to set an adverse precedent for future interpretations of the Venice LUP or the Coastal Act and prejudice the ability to prepare a Chapter 3 compliant LCP in the future.

We urge you to reject this project as proposed and to preserve the existing bungalow and character of Venice.

Exhibit A:

1) Front Yard Setback

The Front Yard Setback on Parcel B is incorrect on 7th as it is to be 15' as required by the code and specifically as enumerated in Ordinance 185,462 of the small lot subdivision ordinance. The applicant is only proposing a 5'-0" Setback. The applicant states that they are not deviating from the code nor requesting any variances or modifications and the determination letter states that "no deviations from the Venice Coastal Specific Plan have been requested;" however, the application and drawings as submitted are not in compliance with these and several other code requirements and thus would require variances or modifications.

Front Yard. There shall be a front yard of not less than 15 feet in depth in the RD1.5	(7) The provisions of the front yard of the underlying zone shall apply to the Front Lot Line of the perimeter of the subdivision.
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SETBACK SUMMARY				
PARCEL	FRONT	REAR	SIDE	SIDE
A	17'6" (VERNON)	0'2"	5'0"	5'0" (7TH AVE)
B	5'0" (7TH AVE)	5'0"	0'2"	6'0" (SUNSET)

The setback from the perimeter boundary for Parcel B specifically the front yard on 7th of the subdivision measure less than the yards required pursuant to LAMC Section 12:22 C-27.

2) Prevailing Setback calculation is misapplied

The prevailing setback calculation used for Parcel B's proposed front yard on 7th, which is permissible for the front yard on Parcel A, is not correct or allowed for parcel B. The prevailing setback should not be universally applied on what is normally a side yard setback on 7th Ave. Typically there is a required setback at the rear yard at the alley of 15' for a typical single family residence, if the prevailing setback is to be applied an analysis of how many two story high structures along 7th Ave. would be appropriate that extend into this rear yard setback, should be conducted as a measure of the massing that effect the immediate neighbors on Sunset Court. This project is only 6'-0" from this normal rear yard. We understand that with the small lot subdivision this parcel is now divided, and that parcel B desires a front yard onto 7th street. Therefore, the front yard provision and code requirement of 15' shall apply. The proposed yards on Parcel B are inconsistent with existing patterns of development along 7th Avenue.

3) The parking as proposed is not code compliant

The backup space in the substandard alley at only an improved width of 6.75' is not sufficient and the tandem parking will create a hazardous condition, blocking the substandard alleyway and preventing emergency ingress and egress. Even with the proposed dedication to a width of 13.5' the required back up space as proposed is not code compliant.

4) The LAMC may not permit this maximum approved density

There is an intensification of use by providing 5 parking spaces where 2-3 would normally be required in the zone.

5) Roof access structure is not permissible

In the determination letter it states "no roof access structure is proposed;" however, the plans available online show an enclosed stair penthouse structure, which is not permissible and is not properly setback from the required yards as required by code. This roof access stair penthouse extends to a height of 35' with a flat roof which is not allowable and inconsistent with certified LUP Policy 1.A.1 and lot consolidation restrictions. The code only allows a maximum of 5' for roof access. Furthermore, this stair tower blocks valuable access to sun, natural light and ventilation to neighboring properties. The added height limits provide access to solar energy but put the neighbors' rooftops in shadow and thus block their access to the sun.

6) Building Height

The building height of parcel B shall be setback from the required front yard one foot for every foot in height of 25' considering that the code required yard for parcel B is 15' the project is non in conformance with the height along 7th.

7) Excavation concerns

There are concerns about the proximity of the proposed pools in relation to the most immediate neighbor with respect to noise trespass as well as the practical aspects and liabilities of settlement, vibration etc. associated with a deepened excavation adjacent to the existing older home.

We appreciate your thoughts and consideration to make sure this project is in compliance with not only the letter of the code but the spirit of the code, and that the immediate neighbors' and the community's concerns are appropriately addressed.

Exhibit B:

General Public Comment at APC Hearing July 7, 2021

It has been so disheartening in how this formation of the APC. You seem to be unwilling to apply the certified LUP as the standard of review for all CDPs. Citizens Preserving Venice, an advocacy organization has addressed this at every hearing on Venice applications. We asking you take the time and initiative to study, understand it and apply it correctly. It is your responsibility.

But I want to address another aspect of your responsibility – that is the distinction between a historic resource and a contributor to a historic district as defined by preservationists.

A Historic Resource is given a more rigorous review using criteria found in CEQA based on Federal and local preservation criteria: “properties officially designated or recognized by a local government.”

A Contributor, and this a big distinction: LA Conservancy defines it as “one of the building or site features that give historical districts its significance- a building that was built within the period of significance and that sufficiently retains its historic features.” And further “Individual [i.e, contributing] buildings in a district NEED NOT be historic landmarks, they can derive their association with the district.” This is important because your determinations incorrectly ruled, confusing these definitions destroy these important Venice districts and prejudice the writing of the LCP now going on. And all of Venice should be considered a historic district. SurveyLA missed this important feature.

You constantly ignore this when you allow an Applicant to demolish and build a non-compliant new development, replacing a contributor that plays a critical role in preserving the character of Venice, a special coastal community. 925 Marco is an especially egregious example; it compromised the Walk Street historic district and you made that happen.

To retain an historical district, it must have a significant number of contributors. Every time you allow a developer to demolish an existing contributor you compromise that historic district. That said, it does not mean a proposed project cannot be altered – It must not erase those features that define a contributor. Several designers/architects have successfully designed an addition without removing those defining features.

So, when you see a Contributor, please be cognizant of what a contributor represents. Don’t dismiss it in your deliberations on new development and prejudice the writing of the LCP to preserve the character of Venice.

Notice of interested parties for Coastal Appeal:

Case: DIR-2018-2002-CDP-MEL-1A

1) Rob Huff
705 Vernon Ave.
Venice, Ca. 90291
hauxtage@gmail.com

2) Joan Huff
705 Vernon Ave.
Venice, Ca. 90291

3) Karen Jones
704 Sunset Ave.
Venice, CA. 902921
khjones1949@yahoo.com

4) 831 LLC.
708 Sunset Ave.
Venice, ca. 90291

5) Preserve Venice
preservevenice@gmail.com

6) David Hertz Architects, inc.
57 Market Street
Venice, Ca. 90291

7) Citizens Preserving Venice
763 Nowita Place
Venice, Ca. 90291

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: A-5-VEN-21-0051Date Filed: 7/19/2021Appellant Name(s): Joan Huff**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 North Coast district office, the email address is 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 information¹

Name: Joan Huff

Mailing address: 705 Vernon Ave. Venice, ca. 90291

Phone number: 733-7670

Email address: hauxtage@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: _____
 submitted an email letter and called into hearing.

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 did not receive any notices to the hearings but heard about it from one neighbor.

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: _____
 All other processes through the City of LA have been exhausted.

¹ 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 appealed²

Local government name: Los Angeles Planning Commission

Local government approval body: West Los Angeles Area Planning Commission

Local government CDP application number: DIR-2018-2002-CDP-MEL-1A

Local government CDP decision: ☒ CDP approval ☐ CDP denial³

Date of local government CDP decision: June 16th, 2021

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

Describe:

701 and 701 1/2 Vernon Ave. Venice, Ca. 90291

² 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.

³ 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. Applicant information

Applicant name(s): Joan Huff
705 Vernon Ave. Venice, Ca. 90291
Applicant Address: _____

4. Grounds for this appeal⁴

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 sheets for description

⁴ Attach additional sheets as necessary to fully describe the grounds for appeal.

Appeal of local CDP decision
Page 5

5. 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., 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

6. Appellant certifications

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

Print name Joan Huff

Signature _____

Date of Signature 7/19/21

7. Representative authorization⁵

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.

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

⁶ 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

455 MARKET STREET, SUITE 300
 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 Joan Huff

CDP Application or Appeal Number DIR-2018-2002-CDP-MEL-1A

Lead Representative

Name David Hertz Architects inc.
 Title Architect
 Street Address 57 Market Street
 City Venice,
 State, Zip ca. 90291
 Email Address hertz@studioea.com
 Daytime Phone 310-383-7013

Your Signature member: F25DA4F3-26F7-459F-ABFC-506A6DC85257 75DE9CE7-D983-407D-93C6-3021324782BF Digitally signed by member: F25DA4F3-26F7-459F-ABFC-506A6DC85257 75DE9CE7-D983-407D-93C6-3021324782BF
Date: 2021.07.19 15:35:50 -07'00'

Date of Signature member: F25DA4F3-26F7-459F-ABFC-506A6DC85257 75DE9CE7-D983-407D-93C6-3021324782BF Digitally signed by member: F25DA4F3-26F7-459F-ABFC-506A6DC85257 75DE9CE7-D983-407D-93C6-3021324782BF
Date: 2021.07.19 15:35:50 -07'00'

Additional Representatives (as necessary)

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

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

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

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

Your Signature member: F25DA4F3-26F7-459F-ABFC-506A6DC85257 75DE9CE7-D983-407D-93C6-3021324782BF Digitally signed by member: F25DA4F3-26F7-459F-ABFC-506A6DC85257 75DE9CE7-D983-407D-93C6-3021324782BF
Date: 2021.07.19 15:36:50 -0700

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Date: 2021.07.19 15:36:50 -0700

Notice of interested parties for Coastal Appeal:

Case: DIR-2018-2002-CDP-MEL-1A

1) Rob Huff
705 Vernon Ave.
Venice, Ca. 90291
hauxtage@gmail.com

2) Joan Huff
705 Vernon Ave.
Venice, Ca. 90291

3) Karen Jones
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4) 831 LLC.
708 Sunset Ave.
Venice, ca. 90291

5) Preserve Venice
preservevenice@gmail.com

6) David Hertz Architects, inc.
57 Market Street
Venice, Ca. 90291

7) Citizens Preserving Venice
763 Nowita Place
Venice, Ca. 90291

4. GROUNDS FOR THIS APPEAL- DIR-20108-2002-CDP-MEL-1A
701-701 ½ Vernon Ave, Venice
5-VEN-21-0043

Introduction:

This project is a small lot subdivision and construction of two very large spec houses, each with a pool, where a beautiful 1922 bungalow now sits on the corner of Vernon Ave and 7th Ave.

The appellants are a small group of long-term residents in the Oakwood community, some dating back to direct ancestry of Irving Tabor, the chauffeur and close confidant of Abbot Kinney. We are very concerned with this project in particular--a small lot subdivision that seeks to remove a quaint, home on the corner of Vernon and 7th that represents the historic character of our community. We have witnessed the demolition approved over the years that has allowed the destruction of Oakwood homes by speculation and over development.

Preserving a 1922 historic bungalow on a particularly important and visible corner of the Oakwood neighborhood of Venice, a neighborhood of important historic significance, is of the utmost importance in preserving and protecting the community character of the Special Coastal Community of Venice, a coastal resource, which, among other things, is defined by its historic and cultural architecture.

This area of Venice still retains the character, mass and scale of the original Venice. **All of the immediately abutting and adjacent properties and surrounding neighbors are in similarly one story small-scaled historic bungalows** in this important older era.

The city erred when it used the entirety of Vernon street to Lincoln to justify "character mass and scale", this is too large a range in which to view the immediate character which forms an intersection of one story bungalows on 7th and continues in each direction for a majority of 7th Street to form the one story character mass and scale of the community on 7th, which is characterized by houses of a similar style and scale to the subject property. Using a larger radius from Lincoln to 7th on Vernon, which has been already over developed skews the results. This is a perfect example of cumulative impacts creating an exponential and disproportional skew towards making a case for larger structures, with each larger structure approved, thus the continued elimination of contributing character for smaller structures. Even then, according to the Letter of Determination: "Of the 40 structures, one is three stories, 12 are two stories, 27 are one-story structures."

Accordingly, the majority of the houses that define the mass scale and character of this area surveyed by over two times, greater are single story houses than two story houses.

From the LOD.

The project is located at the intersection of 7th Avenue and Vernon Avenue. The existing structures adjacent to the intersection are comprised of one-story single-family dwellings."

Here the City does acknowledge the intersection is all one- story residences but fails to give appropriate weight to the importance of the intersection on the pedestrian experience.

Regarding appropriate setbacks consistent with the character mass and scale along 7th Street the City failed to appropriately address the existing streetscape and the fact that a majority of the single family homes on 7th have rear yards as is required in the zone. This 15' buffer off the alleys preserve open space, natural light and natural ventilation. The Small lot subdivision obliterates the proportioning in favor of a continued largely uninterrupted plane which on an end lot, has the unintended consequence of creating much more bulk and massing than would otherwise be allowed.

"The proposed two-story single-family dwellings provide a 15-foot front yard setback on Vernon Avenue, consistent with the requirements of the RD1.5 zone and further recess portions of the side walls along 7th Avenue to reduce the massing of the structure."



Existing one story bungalows on 7th Ave and Vernon

701 E VERNON AVENUE, VENICE, CA 90291

APN: 4240-016-076 | Lots 49 of Block None, Tract 1694

702 Sunset Ct



(Proposed Conceptual Rendering Only)

701 Vernon Ave



(Proposed Conceptual Rendering Only)

The appellants are concerned that this project seeks to demolish this existing single-family home, which is clearly an historic contributor (even if not actually determined to be historic in the official historic contributor survey, meeting the contributor criteria of SurveyLA, as explained below). This project would have significant negative effects by not maintaining a structure that

represent the character of Venice's history, especially on a prominent public corner such as this. 7th Avenue is a major N/S road thoroughfare.

Venice continues to be challenged by new spec development, which is changing the scale and character of the Oakwood neighborhood in particular, which is being developed with larger spec homes similar to the one proposed. Venice is a community that has been able to maintain its character somewhat, by having a mix of existing smaller scale homes next to new projects with varied styles of architecture that maintain the neighborhood scale and massing (as per certified LUP Policy I.E.3.). However, that character becomes ultimately lost when most every new home seems to be a new spec home that seeks to maximize square footage and is built in a similar excessive and incompatible size as this project.

Ultimately, we are at risk of destroying the character that makes Venice so unique and different from the mostly homogenous architecture elsewhere. The law requires the protection of Venice's character, and the city and Coastal Commission are responsible for making sure it is protected.

Mass, Scale and Character:

This project does not meet the requirement in the certified Venice Land Use Plan for compatibility with the mass, scale and character of the surrounding neighborhood as the project as proposed is not visually compatible with the mass, scale and character of this surrounding area. The proposed project is inconsistent with the existing pattern of development along 7th, both in sheer size and in subdivision pattern, and was only considered in the context of Vernon. The block is described as predominately single-story bungalows. The proposed development's size (6,008 square feet) is almost FOUR TIMES the average of the corner lots (1,541 square feet) as well as of the first 10 lots (both north and south sides of the street, averaging 1,603 square feet). No homes were built after 1957. Five were built before 1927 when Venice's annexation was complete. The existing homes at the intersection of Vernon and 7th are all one-story bungalow scale homes. The project is inconsistent with the immediate massing of the small one-story bungalows on all four corners of Vernon and 7th and especially along much of 7th. The massing of the project, including the stairwell proposed on the plans, is not setback from 7th street and provides for an unarticulated continuous height of 35'. The nontransparent handrails increase the massing along 7th even more.

The massing on 7th Ave in particular is inconsistent with other adjacent developments and will create a significant change to the mass, scale and character of this neighborhood that is most visually apparent on a corner lot where the massing along the length of the property is more public facing than an interior record lot. The certified Land use Plan recognizes the importance of the existing pedestrian scale residential neighborhoods and the need to conserve them. Therefore, new structures should be sited and articulated to respect a pedestrian scale while also maintaining visual compatibility with the surrounding neighborhood. The city's analysis did not take into consideration that the proposed development is located on a large corner lot that would be highly visible to pedestrians along both Vernon and 7th Avenues whereas the massing of homes in the middle of a block would be more hidden. In this case, the development lacks articulation and is not stepped back. In fact, the portion of the development that rises to the maximum height is at the most visible corner location. Taking into consideration the combination

of the visibility of the larger corner lot and the bulky frontage of the development, the home would appear to be very large compared to other homes in the neighborhood and is, thus, inconsistent with the character of the surrounding development in this regard. While the City did provide some analysis regarding the character and scale of the proposed home within the existing neighborhood, the city was remiss in failing to factor in the home's visual impact given that it is situated on a corner lot. This lack of articulation and excessive bulk, if implemented on future projects, has the potential to adversely impact community character. Therefore, the mass of the home is not compatible with the mass, scale and character of the area and violates LUP Policies I.E.2 and I.E.3 and the Chapter 3 policies of the Coastal Act.

In addition, this project, a modern two-story glass spec house, would set a precedent to allow more of this kind of building and the loss of the homes with character-defining features, causing an adverse cumulative impact. Lastly, the privacy and peaceful enjoyment of adjacent properties and the use of their open rear yards are compromised by the proposed roof deck locations. At a minimum the roof decks must be placed closer to 7th and away from the immediate neighboring properties and back yards to the north and east sides and moved towards the southwest and Vernon and 7th towards the public streets.

Historic Resources:

Venice is a Special Coastal Community, defined in the certified LUP as:

"An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast."

Certified LUP Policy I.E.1. requires protection and preservation of the Special Coastal Community of Venice. As such, its historic architecture and culture ***must*** be protected. This particular parcel with the existing home, which is in very good condition and which is a particularly good example of a craftsman bungalow, should be considered for preservation, especially **as corner lots have more cumulative impact than do interior record lots**, in the way in which the side elevation changes the character and the significant impacts that the longitudinal elevation has on the neighborhood.

In the city's determination, the difference between an historic resource and a contributor is misinterpreted. This difference must be correctly applied to avoid a loss of character-defining structures and an adverse cumulative effect on community character. A contributor may not be eligible for an historic cultural monument classification but its role in determining character of a neighborhood is important and even crucial to recognize. Unfortunately, Oakwood is not considered by SurveyLA to be an Historic District but rather a Planning District, although that could change as we have been told that a re-survey of Venice and consideration of Oakwood as an Historic District will be part of the Venice Community Plan and LCP process. We understand that the city and the Commission are looking into this, and during the recent Listening Sessions held by the Coastal Commission with members of the Venice community most of the questions put to the groups focused on the Oakwood neighborhood.

However, because Oakwood was not originally considered an Historic District, during the SurveyLA inventory a house-by-house inventory was not performed in the Oakwood neighborhood. However, by definition, a Planning District is to use the same planning tools to

assess whether a home would be a contributor and the same considerations are to be applied in the design of a remodel. **A contributor is not to be demolished for purposes of non-characteristic new development.** Given the standards of SurveyLA, this structure would have merited the designation as a contributor if it had been surveyed. In a Planning District a Venice property is to be considered in the same way a contributor in an Historic District would be:

“Planning Districts are geographically defined areas that do not meet eligibility standards for designation but that merit consideration in local planning. These areas generally have consistent planning concepts and features such as height, massing, setbacks, and street trees. The determination is used to inform the Community Plans and other policy documents....” (*Field Survey Results Master Report*. Department of City Planning, Office of Historic Resources, p9.)

Oakwood as an Historical District will likely be considered in the new survey; however, losing these characteristic homes such as the existing home at 701 Vernon Ave diminishes the Oakwood neighborhood’s eligibility to be redesignated an Historic District as the designation depends on a critical count of how many homes do define its character!

Cumulative Impact is defined by Coastal Act Section 30105.5 as the 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. Here we have an obvious probable negative impact of future projects that will use this project as a precedent. We have been before you and the city too many times seeing these defining homes be destroyed. There are several other current projects coming through the planning system that intend to do the same thing. And it is very highly probable that there will be more similar projects down the pike if this one is approved. This is an onslaught. It must end.

The OHR report does not accurately reflect the importance of the existing residences in the context of the immediate neighborhood and mass scale and character as required by the Coastal Act, nor does it consider the importance of this obviously historic, 99-year old home to the community in accordance with CEQA. The local conditions and individual project parameters don’t take into consideration the cumulative impacts on the coastal resource of the historic Oakwood section of Venice as well as the important social equity issues that should be considered. **The property is a potential contributor to a future historical area and has a significant association with the African American community** and there have been recent discoveries with regards to even more existing residential structures that would qualify as contributors that were not contemplated in the OHR report. The city’s findings do not take into consideration the significant adverse cumulative effect on the coastal resource of the historic Oakwood section of Venice. The city’s Office of Historic Resources (OHR) and the CDP decision maker erred in permitting this demolition.

The demolition of this property would prejudice the writing of the LCP. The impact that losing this probable contributor has on the Oakwood Planning District neighborhood must be carefully considered. See also remarks at Exhibit B explaining this issue in more detail.

Significant Adverse Cumulative Effect:

Coastal Act Section 30250 requires consideration of the cumulative effects of the project. As defined in the Coastal Act, cumulative effect means the 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. The city did not consider the cumulative effect of this project in its findings, which is an error and abuse of discretion.

We are very concerned about the adverse cumulative effect of the loss of existing homes, especially those on corners, as they have a large exposure. This immediate area is made up of small bungalows on all sides and the insertion of a maxed-out box will forever alter the character of the neighborhood due to the loss of a potential contributing existing house, especially given its prominent corner location and in the context of primarily one-story bungalows of contributing character. This project as proposed and if allowed, would forever change this area and cumulatively contribute to an overall loss of the smaller bungalows that represent the character of the Oakwood community specifically and the character of Venice in general. This Project is wholly inconsistent with the existing mass scale and character of the immediate neighborhood, which is largely defined as one story bungalows on all corners of the intersection at 7th and Vernon.

Many such proposed small lot subdivision projects have been summarily rejected by not only the Venice Neighborhood Council but by the Council Office and on appeal with the West L.A. Area Planning Commission and the Coastal Commission. This is because small lot subdivision projects are typically substantially incompatible with the mass, scale and character of the area and significantly change the subdivision pattern of the neighborhood. This project seeks to maximize the size to an extent that is clearly materially different than the existing mass and scale in the surrounding area, with not only the immediately surrounding homes that comprise small bungalows, but also because of its prominence on 7th street which changes the mass, scale and character and eclipses some of the few remaining low-scale bungalows on this highly visible intersection. Allowing this project, considering the effects of past similar projects, the effects of other similar current projects, and the effects of probable similar future projects, would not only completely change the subdivision pattern and scale of the neighborhood, but it would also have the cumulative impact of changing the character of this multi-family coastal land use designation into a single-family neighborhood. This also violates the certified LUP policies for protection of Venice's social diversity (I.E.1.).

Environmental Justice:

The impact of such oversized projects such as this spec project, for which the sales price is enhanced by maximizing square footage (at the expense of community character), perpetuates the change from an important, historical African American enclave to an enclave for the rich, which is a significant social equity and environmental justice issue.

In addition, the Mello Act determination is not accurate. There are inconsistencies within the city's determination that pertain to the number of existing units. Page 14 of the City's determination states that "The site currently is developed with two, one-story single-family dwellings..." The property has two addresses, 701 and 701 ½ Vernon Ave. This should have resulted in City Planning further investigating the use of the property as two rental units, but they did not. Although it appears that the developer is living there now, as the neighbors can attest, during the Mello lookback period the owners were renting out two units of the property although they claimed it as vacant for purposes of the Mello determination of replacement affordable

units. There is a front house and a rear unit, and both units have continued to be occupied and were also previously rented as affordable units by the prior owners over the last 3 years as the neighbors have testified. In addition, there has been recent illegal short term rental usage on this property. All of this was overlooked by the city in its quest to support these two luxury homes in this multi-family residential zone.

The Coastal Commission's Environmental Justice Policy (Housing page 8) states that "The Commission will also support measures that protect existing affordable housing. If the Commission staff determines that existing affordable housing would be eliminated as part of a proposed project in violation of another state or federal law, the Commission staff will use its discretion to contact the appropriate agency to attempt to resolve the issue." We request that Commission Staff contact City Planning to request that the correct facts be used in determining the Mello Act-required replacement of affordable units on the existing property.

Summary:

The Commission's standard of review for determining whether to hear the appeal is whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code §30625(b)(1); 14 C.C.R. § 13321. Only with a careful review of the city-approved project can the Commission ensure that community character is preserved and visual resources are protected. If the Commission finds that a substantial issue exists, the Commission will have the opportunity to review and act on the project at the subsequent de novo hearing. Applying the five factors shows that the appeal raises "a substantial issue" with respect to Chapter 3 of the Coastal Act, and therefore, does meet the substantiality standard of Section 30265(b)(1).

The first factor is the degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. While the City found that the project would be consistent with the community character of the area and with Sections 30250, 30251, and 30253 of the Coastal Act, the City's findings for the community character analysis were conclusory and did not have adequate support or a logical conclusion for such a determination. The project, as approved by the City, is not consistent with LUP Policies I.E.1., I.E.2 and I.E.3; thus, as approved by the City, the project would prejudice the City's ability to prepare an LCP that conforms with Chapter 3 of the Coastal Act. In addition, the City erred in allowing several violations of the City codes that are in place in order to protect the neighborhood's mass, scale and character as required by Coastal Act Sections 30251 and 20353 and certified Land Use Plan Policies I.E.1, I.E.2. and I.E.3. See specific list in Exhibit A. Therefore, the City did not provide an adequate degree of factual and legal support for its decision.

The second factor is the extent and scope of the development as approved or denied by the local government. The existing development is a 1,380 square foot single-family home with detached garage. The city-approved development authorizes the demolition of the structure, subdivision of the lot, and construction of two homes. The scope is greater than that of the surrounding development, which is comprised primarily of one-story single-family homes (68% as per the City's findings). The locally approved project would have adverse impacts to visual resources and community character. At 6,008 square feet, the scope of the two homes would be far more massive than any other development on the subject block and OVER FOUR times the size of the existing structure.

The third factor is the significance of the coastal resources affected by the decision. The city-approved project, and others like it that could be approved in the future, would adversely affect the character of the Oakwood neighborhood of Venice, which is a unique coastal community, because it is not consistent with the surrounding development pattern. Venice's unique community character is a significant coastal resource. As described above, the city-approved development will have an adverse visual impact to the pedestrian scale of this area of Venice. Therefore, the city-approved development will have a significant impact on coastal resources, inconsistent with Coastal Act Sections 30250, 30251, and 30253.

The fourth factor is the precedential value of the local government's decision for future interpretations of its Local Coastal Program (LCP). The city does not currently have a certified LCP but it does have a certified Land Use Plan. The City-approved development is not consistent with the residential building standards and the policies related to mass, scale, character, and architectural diversity as set forth in the certified Land Use Plan policies I.E.1, I.E.2, and I.E.3. Approval of a project that is not consistent with the standards of the Land Use Plan would set a precedent for other projects that are not consistent with the Land Use Plan and would prejudice the City's ability to prepare a Chapter 3 compliant certified LCP for Venice. Thus, the project, as approved, does raise a substantial issue about the project's consistency with the certified LUP, and by extension, the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that the city-approved development will have a significant adverse impact on future interpretations of its LUP.

The fifth factor is whether the appeal raises local issues, or those of regional or statewide significance. Impacts to coastal resources, including community character, are important statewide issues. The City-approved development is inconsistent with various policies of the certified LUP and with Chapter 3 of the Coastal Act. This appeal raises specific local issues, but Venice is one of the most popular visitor destinations in the state, making its preservation as a Special Coastal Community with a unique character a statewide issue. Therefore, the City's approval does raise issues of statewide significance.

Conclusion:

The primary issue for the appeal is potential adverse cumulative impacts to visual resources and community character. The City-approved project is not in conformity with the Chapter 3 policies of the Coastal Act and, therefore, the appeal raises a substantial issue as to consistency and conformity with the Chapter 3 policies of the Coastal Act. In addition, the decision is likely to set an adverse precedent for future interpretations of the Venice LUP or the Coastal Act and prejudice the ability to prepare a Chapter 3 compliant LCP in the future.

We urge you to reject this project as proposed and to preserve the existing bungalow and character of Venice.

Exhibit A:

1) Front Yard Setback

The Front Yard Setback on Parcel B is incorrect on 7th as it is to be 15' as required by the code and specifically as enumerated in Ordinance 185,462 of the small lot subdivision ordinance. The applicant is only proposing a 5'-0" Setback. The applicant states that they are not deviating from the code nor requesting any variances or modifications and the determination letter states that "no deviations from the Venice Coastal Specific Plan have been requested;" however, the application and drawings as submitted are not in compliance with these and several other code requirements and thus would require variances or modifications.

Front Yard. There shall be a front yard of not less than 15 feet in depth in the RD1.5	(7) The provisions of the front yard of the underlying zone shall apply to the Front Lot Line of the perimeter of the subdivision.
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SETBACK SUMMARY				
PARCEL	FRONT	REAR	SIDE	SIDE
A	17'6" (VERNON)	0'2"	5'0"	5'0" (7TH AVE)
B	5'0" (7TH AVE)	5'0"	0'2"	6'0" (SUNSET)

The setback from the perimeter boundary for Parcel B specifically the front yard on 7th of the subdivision measure less than the yards required pursuant to LAMC Section 12:22 C-27.

2) Prevailing Setback calculation is misapplied

The prevailing setback calculation used for Parcel B's proposed front yard on 7th, which is permissible for the front yard on Parcel A, is not correct or allowed for parcel B. The prevailing setback should not be universally applied on what is normally a side yard setback on 7th Ave. Typically there is a required setback at the rear yard at the alley of 15' for a typical single family residence, if the prevailing setback is to be applied an analysis of how many two story high structures along 7th Ave. would be appropriate that extend into this rear yard setback, should be conducted as a measure of the massing that effect the immediate neighbors on Sunset Court. This project is only 6'-0" from this normal rear yard. We understand that with the small lot subdivision this parcel is now divided, and that parcel B desires a front yard onto 7th street. Therefore, the front yard provision and code requirement of 15' shall apply. **The proposed yards on Parcel B are inconsistent with existing patterns of development along 7th Avenue.**

3) The parking as proposed is not code compliant

The backup space in the substandard alley at only an improved width of 6.75' is not sufficient and the tandem parking will create a hazardous condition, blocking the substandard alleyway and preventing emergency ingress and egress. Even with the proposed dedication to a width of 13.5' the required back up space as proposed is not code compliant.

4) The LAMC may not permit this maximum approved density

There is an intensification of use by providing 5 parking spaces where 2-3 would normally be required in the zone.

5) Roof access structure is not permissible

In the determination letter it states "no roof access structure is proposed;" however, the plans available online show an enclosed stair penthouse structure, which is not permissible and is not properly setback from the required yards as required by code. This roof access stair penthouse extends to a height of 35' with a flat roof which is not allowable and inconsistent with certified LUP Policy 1.A.1 and lot consolidation restrictions. The code only allows a maximum of 5' for roof access. Furthermore, this stair tower blocks valuable access to sun, natural light and ventilation to neighboring properties. The added height limits provide access to solar energy but put the neighbors' rooftops in shadow and thus block their access to the sun.

6) Building Height

The building height of parcel B shall be setback from the required front yard one foot for every foot in height of 25' considering that the code required yard for parcel B is 15' the project is non in conformance with the height along 7th.

7) Excavation concerns

There are concerns about the proximity of the proposed pools in relation to the most immediate neighbor with respect to noise trespass as well as the practical aspects and liabilities of settlement, vibration etc. associated with a deepened excavation adjacent to the existing older home.

We appreciate your thoughts and consideration to make sure this project is in compliance with not only the letter of the code but the spirit of the code, and that the immediate neighbors' and the community's concerns are appropriately addressed.

Exhibit B:

General Public Comment at APC Hearing July 7, 2021

It has been so disheartening in how this formation of the APC. You seem to be unwilling to apply the certified LUP as the standard of review for all CDPs. Citizens Preserving Venice, an advocacy organization has addressed this at every hearing on Venice applications. We asking you take the time and initiative to study, understand it and apply it correctly. It is your responsibility.

But I want to address another aspect of your responsibility – that is the distinction between a historic resource and a contributor to a historic district as defined by preservationists.

A Historic Resource is given a more rigorous review using criteria found in CEQA based on Federal and local preservation criteria: “properties officially designated or recognized by a local government.”

A Contributor, and this a big distinction: LA Conservancy defines it as “one of the building or site features that give historical districts its significance- a building that was built within the period of significance and that sufficiently retains its historic features.” And further “Individual [i.e, contributing] buildings in a district NEED NOT be historic landmarks, they can derive their association with the district.” This is important because your determinations incorrectly ruled, confusing these definitions destroy these important Venice districts and prejudice the writing of the LCP now going on. And all of Venice should be considered a historic district. SurveyLA missed this important feature.

You constantly ignore this when you allow an Applicant to demolish and build a non-compliant new development, replacing a contributor that plays a critical role in preserving the character of Venice, a special coastal community. 925 Marco is an especially egregious example; it compromised the Walk Street historic district and you made that happen.

To retain an historical district, it must have a significant number of contributors. Every time you allow a developer to demolish an existing contributor you compromise that historic district. That said, it does not mean a proposed project cannot be altered – It must not erase those features that define a contributor. Several designers/architects have successfully designed an addition without removing those defining features.

So, when you see a Contributor, please be cognizant of what a contributor represents. Don't dismiss it in your deliberations on new development and prejudice the writing of the LCP to preserve the character of Venice.

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: A-5-VEN-21-0051Date Filed: 7/19/2021Appellant Name(s): Laura Doss**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 North Coast district office, the email address is 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 information¹

Name: Laura Marie Doss (PRESERVE VENICE)
Mailing address: 708 Sunset Ave. Venice CA. 90291
Phone number: 310-717-2735
Email address: laura@lauradoss.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 called into hearing and sent email.

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 did not receive any notices to prior hearings within the timeframes needed.[†]

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:

The APC was the last venue for the City of Los Angeles.

¹ 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 appealed²

Local government name: West Los Angeles Area Planning Commission³
Local government approval body: APC
Local government CDP application number: DIR-2018-2002-CDP-MEL-1A
Local government CDP decision: ☒ CDP approval ☐ CDP denial³
Date of local government CDP decision: JUNE 16TH, 2021

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

Describe:

701 and 701 1/2 Vernon Ave. Venice, CA. 90291

² 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.

³ 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. Applicant information

Applicant name(s): Laura Doss
Applicant Address: 708 Sunset Ave. Venice Ca. 90291

4. Grounds for this appeal⁴

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)

⁴ Attach additional sheets as necessary to fully describe the grounds for appeal.

Appeal of local CDP decision
Page 5

5. 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., 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

6. Appellant certifications

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

Print name Laura Doss


Signature

Date of Signature 7/19/21

7. Representative authorizations

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.

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

⁶ 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

455 MARKET STREET, SUITE 300
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 Laura Doss

CDP Application or Appeal Number DIR-2018-2002-CDP-MEL-1A

Lead Representative

Name David Hertz Architects, inc.

Title Architects

Street Address 57 Market Street

City Venice

State, Zip CA. 90291

Email Address laura@lauradoss.com

Daytime Phone 310-717-2735

Your Signature 

Date of Signature 7.19.21

Additional Representatives (as necessary)

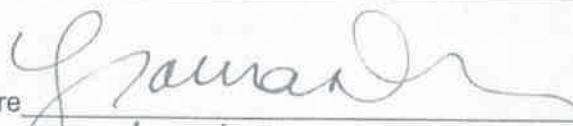
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Email Address _____
Daytime Phone _____

Your Signature



Date of Signature

7/19/21

4. GROUNDS FOR THIS APPEAL- DIR-20108-2002-CDP-MEL-1A
701-701 ½ Vernon Ave, Venice
5-VEN-21-0043

Introduction:

This project is a small lot subdivision and construction of two very large spec houses, each with a pool, where a beautiful 1922 bungalow now sits on the corner of Vernon Ave and 7th Ave.

The appellants are a small group of long-term residents in the Oakwood community, some dating back to direct ancestry of Irving Tabor, the chauffeur and close confidant of Abbot Kinney. We are very concerned with this project in particular--a small lot subdivision that seeks to remove a quaint, home on the corner of Vernon and 7th that represents the historic character of our community. We have witnessed the demolition approved over the years that has allowed the destruction of Oakwood homes by speculation and over development.

Preserving a 1922 historic bungalow on a particularly important and visible corner of the Oakwood neighborhood of Venice, a neighborhood of important historic significance, is of the upmost importance in preserving and protecting the community character of the Special Coastal Community of Venice, a coastal resource, which, among other things, is defined by its historic and cultural architecture.

This area of Venice still retains the character, mass and scale of the original Venice. **All of the immediately abutting and adjacent properties and surrounding neighbors are in similarly one story small-scaled historic bungalows** in this important older era.

The city erred when it used the entirety of Vernon street to Lincoln to justify "character mass and scale", this is too large a range in which to view the immediate character which forms an intersection of one story bungalows on 7th and continues in each direction for a majority of 7th Street to form the one story character mass and scale of the community on 7th, which is characterized by houses of a similar style and scale to the subject property. Using a larger radius from Lincoln to 7th on Vernon, which has been already over developed skews the results. This is a perfect example of cumulative impacts creating an exponential and disproportional skew towards making a case for larger structures, with each larger structure approved, thus the continued elimination of contributing character for smaller structures. Even then, according to the Letter of Determination: "Of the 40 structures, one is three stories, 12 are two stories, 27 are one-story structures."

Accordingly, the majority of the houses that define the mass scale and character of this area surveyed by over two times, greater are single story houses than two story houses.

From the LOD,

The project is located at the intersection of 7th Avenue and Vernon Avenue. The existing structures adjacent to the intersection are comprised of one-story single-family dwellings."

Here the City does acknowledge the intersection is all one- story residences but fails to give appropriate weight to the importance of the intersection on the pedestrian experience.

Regarding appropriate setbacks consistent with the character mass and scale along 7th Street the City failed to appropriately address the existing streetscape and the fact that a majority of the single family homes on 7th have rear yards as is required in the zone. This 15' buffer off the alleys preserve open space, natural light and natural ventilation. The Small lot subdivision obliterates the proportioning in favor of a continued largely uninterrupted plane which on an end lot, has the unintended consequence of creating much more bulk and massing than would otherwise be allowed.

"The proposed two-story single-family dwellings provide a 15-foot front yard setback on Vernon Avenue, consistent with the requirements of the RD1.5 zone and further recess portions of the side walls along 7th Avenue to reduce the massing of the structure."

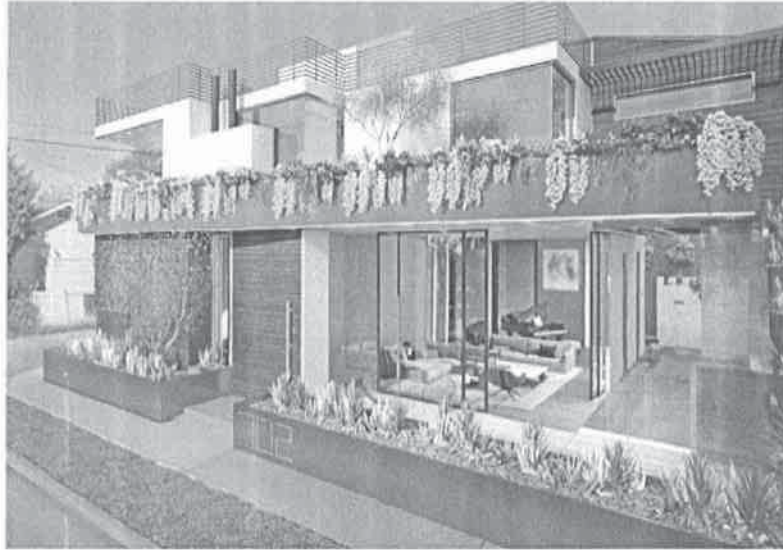


Existing one story bungalows on 7th Ave and Vernon

701 E VERNON AVENUE, VENICE, CA 90291

APN: 4240-016-076 | Lots 49 of Block None, Tract 1694

702 Sunset Ct



(Proposed Conceptual Rendering Only)

701 Vernon Ave



(Proposed Conceptual Rendering Only)

The appellants are concerned that this project seeks to demolish this existing single-family home, which is clearly an historic contributor (even if not actually determined to be historic in the official historic contributor survey, meeting the contributor criteria of SurveyLA, as explained below). This project would have significant negative effects by not maintaining a structure that

represent the character of Venice's history, especially on a prominent public corner such as this. 7th Avenue is a major N/S road thoroughfare.

Venice continues to be challenged by new spec development, which is changing the scale and character of the Oakwood neighborhood in particular, which is being developed with larger spec homes similar to the one proposed. Venice is a community that has been able to maintain its character somewhat, by having a mix of existing smaller scale homes next to new projects with varied styles of architecture that maintain the neighborhood scale and massing (as per certified LUP Policy I.E.3.). However, that character becomes ultimately lost when most every new home seems to be a new spec home that seeks to maximize square footage and is built in a similar excessive and incompatible size as this project.

Ultimately, we are at risk of destroying the character that makes Venice so unique and different from the mostly homogenous architecture elsewhere. The law requires the protection of Venice's character, and the city and Coastal Commission are responsible for making sure it is protected.

Mass, Scale and Character:

This project does not meet the requirement in the certified Venice Land Use Plan for compatibility with the mass, scale and character of the surrounding neighborhood as the project as proposed is not visually compatible with the mass, scale and character of this surrounding area. The proposed project is inconsistent with the existing pattern of development along 7th, both in sheer size and in subdivision pattern, and was only considered in the context of Vernon. The block is described as predominately single-story bungalows. The proposed development's size (6,008 square feet) is almost FOUR TIMES the average of the corner lots (1,541 square feet) as well as of the first 10 lots (both north and south sides of the street, averaging 1,603 square feet). No homes were built after 1957. Five were built before 1927 when Venice's annexation was complete. The existing homes at the intersection of Vernon and 7th are all one-story bungalow scale homes. The project is inconsistent with the immediate massing of the small one-story bungalows on all four corners of Vernon and 7th and especially along much of 7th. The massing of the project, including the stairwell proposed on the plans, is not setback from 7th street and provides for an unarticulated continuous height of 35'. The nontransparent handrails increase the massing along 7th even more.

The massing on 7th Ave in particular is inconsistent with other adjacent developments and will create a significant change to the mass, scale and character of this neighborhood that is most visually apparent on a corner lot where the massing along the length of the property is more public facing than an interior record lot. The certified Land use Plan recognizes the importance of the existing pedestrian scale residential neighborhoods and the need to conserve them. Therefore, new structures should be sited and articulated to respect a pedestrian scale while also maintaining visual compatibility with the surrounding neighborhood. The city's analysis did not take into consideration that the proposed development is located on a large corner lot that would be highly visible to pedestrians along both Vernon and 7th Avenues whereas the massing of homes in the middle of a block would be more hidden. In this case, the development lacks articulation and is not stepped back. In fact, the portion of the development that rises to the maximum height is at the most visible corner location. Taking into consideration the combination

of the visibility of the larger corner lot and the bulky frontage of the development, the home would appear to be very large compared to other homes in the neighborhood and is, thus, inconsistent with the character of the surrounding development in this regard. While the City did provide some analysis regarding the character and scale of the proposed home within the existing neighborhood, the city was remiss in failing to factor in the home's visual impact given that it is situated on a corner lot. This lack of articulation and excessive bulk, if implemented on future projects, has the potential to adversely impact community character. Therefore, the mass of the home is not compatible with the mass, scale and character of the area and violates LUP Policies I.E.2 and I.E.3 and the Chapter 3 policies of the Coastal Act.

In addition, this project, a modern two-story glass spec house, would set a precedent to allow more of this kind of building and the loss of the homes with character-defining features, causing an adverse cumulative impact. Lastly, the privacy and peaceful enjoyment of adjacent properties and the use of their open rear yards are compromised by the proposed roof deck locations. At a minimum the roof decks must be placed closer to 7th and away from the immediate neighboring properties and back yards to the north and east sides and moved towards the southwest and Vernon and 7th towards the public streets.

Historic Resources:

Venice is a Special Coastal Community, defined in the certified LUP as:

"An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast."

Certified LUP Policy I.E.1. requires protection and preservation of the Special Coastal Community of Venice. As such, its historic architecture and culture ***must*** be protected. This particular parcel with the existing home, which is in very good condition and which is a particularly good example of a craftsman bungalow, should be considered for preservation, especially **as corner lots have more cumulative impact than do interior record lots**, in the way in which the side elevation changes the character and the significant impacts that the longitudinal elevation has on the neighborhood.

In the city's determination, the difference between an historic resource and a contributor is misinterpreted. This difference must be correctly applied to avoid a loss of character-defining structures and an adverse cumulative effect on community character. A contributor may not be eligible for an historic cultural monument classification but its role in determining character of a neighborhood is important and even crucial to recognize. Unfortunately, Oakwood is not considered by SurveyLA to be an Historic District but rather a Planning District, although that could change as we have been told that a re-survey of Venice and consideration of Oakwood as an Historic District will be part of the Venice Community Plan and LCP process. We understand that the city and the Commission are looking into this, and during the recent Listening Sessions held by the Coastal Commission with members of the Venice community most of the questions put to the groups focused on the Oakwood neighborhood.

However, because Oakwood was not originally considered an Historic District, during the SurveyLA inventory a house-by-house inventory was not performed in the Oakwood neighborhood. However, by definition, a Planning District is to use the same planning tools to

assess whether a home would be a contributor and the same considerations are to be applied in the design of a remodel. **A contributor is not to be demolished for purposes of non-characteristic new development.** Given the standards of SurveyLA, this structure would have merited the designation as a contributor if it had been surveyed. In a Planning District a Venice property is to be considered in the same way a contributor in an Historic District would be:

“Planning Districts are geographically defined areas that do not meet eligibility standards for designation but that merit consideration in local planning. These areas generally have consistent planning concepts and features such as height, massing, setbacks, and street trees. The determination is used to inform the Community Plans and other policy documents....” (*Field Survey Results Master Report*. Department of City Planning, Office of Historic Resources, p9.)

Oakwood as an Historical District will likely be considered in the new survey; however, losing these characteristic homes such as the existing home at 701 Vernon Ave diminishes the Oakwood neighborhood's eligibility to be redesignated an Historic District as the designation depends on a critical count of how many homes do define its character!

Cumulative Impact is defined by Coastal Act Section 30105.5 as the 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. Here we have an obvious probable negative impact of future projects that will use this project as a precedent. We have been before you and the city too many times seeing these defining homes be destroyed. There are several other current projects coming through the planning system that intend to do the same thing. And it is very highly probable that there will be more similar projects down the pike if this one is approved. This is an onslaught. It must end.

The OHR report does not accurately reflect the importance of the existing residences in the context of the immediate neighborhood and mass scale and character as required by the Coastal Act, nor does it consider the importance of this obviously historic, 99-year old home to the community in accordance with CEQA. The local conditions and individual project parameters don't take into consideration the cumulative impacts on the coastal resource of the historic Oakwood section of Venice as well as the important social equity issues that should be considered. **The property is a potential contributor to a future historical area and has a significant association with the African American community** and there have been recent discoveries with regards to even more existing residential structures that would qualify as contributors that were not contemplated in the OHR report. The city's findings do not take into consideration the significant adverse cumulative effect on the coastal resource of the historic Oakwood section of Venice. The city's Office of Historic Resources (OHR) and the CDP decision maker erred in permitting this demolition.

The demolition of this property would prejudice the writing of the LCP. The impact that losing this probable contributor has on the Oakwood Planning District neighborhood must be carefully considered. See also remarks at Exhibit B explaining this issue in more detail.

Significant Adverse Cumulative Effect:

Coastal Act Section 30250 requires consideration of the cumulative effects of the project. As defined in the Coastal Act, cumulative effect means the 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. The city did not consider the cumulative effect of this project in its findings, which is an error and abuse of discretion.

We are very concerned about the adverse cumulative effect of the loss of existing homes, especially those on corners, as they have a large exposure. This immediate area is made up of small bungalows on all sides and the insertion of a maxed-out box will forever alter the character of the neighborhood due to the loss of a potential contributing existing house, especially given its prominent corner location and in the context of primarily one-story bungalows of contributing character. This project as proposed and if allowed, would forever change this area and cumulatively contribute to an overall loss of the smaller bungalows that represent the character of the Oakwood community specifically and the character of Venice in general. This Project is wholly inconsistent with the existing mass scale and character of the immediate neighborhood, which is largely defined as one story bungalows on all corners of the intersection at 7th and Vernon.

Many such proposed small lot subdivision projects have been summarily rejected by not only the Venice Neighborhood Council but by the Council Office and on appeal with the West L.A. Area Planning Commission and the Coastal Commission. This is because small lot subdivision projects are typically substantially incompatible with the mass, scale and character of the area and significantly change the subdivision pattern of the neighborhood. This project seeks to maximize the size to an extent that is clearly materially different than the existing mass and scale in the surrounding area, with not only the immediately surrounding homes that comprise small bungalows, but also because of its prominence on 7th street which changes the mass, scale and character and eclipses some of the few remaining low-scale bungalows on this highly visible intersection. Allowing this project, considering the effects of past similar projects, the effects of other similar current projects, and the effects of probable similar future projects, would not only completely change the subdivision pattern and scale of the neighborhood, but it would also have the cumulative impact of changing the character of this multi-family coastal land use designation into a single-family neighborhood. This also violates the certified LUP policies for protection of Venice's social diversity (I.E.1.).

Environmental Justice:

The impact of such oversized projects such as this spec project, for which the sales price is enhanced by maximizing square footage (at the expense of community character), perpetuates the change from an important, historical African American enclave to an enclave for the rich, which is a significant social equity and environmental justice issue.

In addition, the Mello Act determination is not accurate. There are inconsistencies within the city's determination that pertain to the number of existing units. Page 14 of the City's determination states that "The site currently is developed with two, one-story single-family dwellings..." The property has two addresses, 701 and 701 ½ Vernon Ave. This should have resulted in City Planning further investigating the use of the property as two rental units, but they did not. Although it appears that the developer is living there now, as the neighbors can attest, during the Mello lookback period the owners were renting out two units of the property although they claimed it as vacant for purposes of the Mello determination of replacement affordable

units. There is a front house and a rear unit, and both units have continued to be occupied and were also previously rented as affordable units by the prior owners over the last 3 years as the neighbors have testified. In addition, there has been recent illegal short term rental usage on this property. All of this was overlooked by the city in its quest to support these two luxury homes in this multi-family residential zone.

The Coastal Commission's Environmental Justice Policy (Housing page 8) states that "The Commission will also support measures that protect existing affordable housing. If the Commission staff determines that existing affordable housing would be eliminated as part of a proposed project in violation of another state or federal law, the Commission staff will use its discretion to contact the appropriate agency to attempt to resolve the issue." We request that Commission Staff contact City Planning to request that the correct facts be used in determining the Mello Act-required replacement of affordable units on the existing property.

Summary:

The Commission's standard of review for determining whether to hear the appeal is whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code §30625(b)(1); 14 C.C.R. § 13321. Only with a careful review of the city-approved project can the Commission ensure that community character is preserved and visual resources are protected. If the Commission finds that a substantial issue exists, the Commission will have the opportunity to review and act on the project at the subsequent de novo hearing. Applying the five factors shows that the appeal raises "a substantial issue" with respect to Chapter 3 of the Coastal Act, and therefore, does meet the substantiality standard of Section 30265(b)(1).

The first factor is the degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. While the City found that the project would be consistent with the community character of the area and with Sections 30250, 30251, and 30253 of the Coastal Act, the City's findings for the community character analysis were conclusory and did not have adequate support or a logical conclusion for such a determination. The project, as approved by the City, is not consistent with LUP Policies I.E.1., I.E.2 and I.E.3; thus, as approved by the City, the project would prejudice the City's ability to prepare an LCP that conforms with Chapter 3 of the Coastal Act. In addition, the City erred in allowing several violations of the City codes that are in place in order to protect the neighborhood's mass, scale and character as required by Coastal Act Sections 30251 and 30253 and certified Land Use Plan Policies I.E.1, I.E.2. and I.E.3. See specific list in Exhibit A. Therefore, the City did not provide an adequate degree of factual and legal support for its decision.

The second factor is the extent and scope of the development as approved or denied by the local government. The existing development is a 1,380 square foot single-family home with detached garage. The city-approved development authorizes the demolition of the structure, subdivision of the lot, and construction of two homes. The scope is greater than that of the surrounding development, which is comprised primarily of one-story single-family homes (68% as per the City's findings). The locally approved project would have adverse impacts to visual resources and community character. At 6,008 square feet, the scope of the two homes would be far more massive than any other development on the subject block and OVER FOUR times the size of the existing structure.

The third factor is the significance of the coastal resources affected by the decision. The city-approved project, and others like it that could be approved in the future, would adversely affect the character of the Oakwood neighborhood of Venice, which is a unique coastal community, because it is not consistent with the surrounding development pattern. Venice's unique community character is a significant coastal resource. As described above, the city-approved development will have an adverse visual impact to the pedestrian scale of this area of Venice. Therefore, the city-approved development will have a significant impact on coastal resources, inconsistent with Coastal Act Sections 30250, 30251, and 30253.

The fourth factor is the precedential value of the local government's decision for future interpretations of its Local Coastal Program (LCP). The city does not currently have a certified LCP but it does have a certified Land Use Plan. The City-approved development is not consistent with the residential building standards and the policies related to mass, scale, character, and architectural diversity as set forth in the certified Land Use Plan policies I.E.1, I.E.2. and I.E.3. Approval of a project that is not consistent with the standards of the Land Use Plan would set a precedent for other projects that are not consistent with the Land Use Plan and would prejudice the City's ability to prepare a Chapter 3 compliant certified LCP for Venice. Thus, the project, as approved, does raise a substantial issue about the project's consistency with the certified LUP, and by extension, the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that the city-approved development will have a significant adverse impact on future interpretations of its LUP.

The fifth factor is whether the appeal raises local issues, or those of regional or statewide significance. Impacts to coastal resources, including community character, are important statewide issues. The City-approved development is inconsistent with various policies of the certified LUP and with Chapter 3 of the Coastal Act. This appeal raises specific local issues, but Venice is one of the most popular visitor destinations in the state, making its preservation as a Special Coastal Community with a unique character a statewide issue. Therefore, the City's approval does raise issues of statewide significance.

Conclusion:

The primary issue for the appeal is potential adverse cumulative impacts to visual resources and community character. The City-approved project is not in conformity with the Chapter 3 policies of the Coastal Act and, therefore, the appeal raises a substantial issue as to consistency and conformity with the Chapter 3 policies of the Coastal Act. In addition, the decision is likely to set an adverse precedent for future interpretations of the Venice LUP or the Coastal Act and prejudice the ability to prepare a Chapter 3 compliant LCP in the future.

We urge you to reject this project as proposed and to preserve the existing bungalow and character of Venice.

Exhibit A:

1) Front Yard Setback

The Front Yard Setback on Parcel B is incorrect on 7th as it is to be 15' as required by the code and specifically as enumerated in Ordinance 185,462 of the small lot subdivision ordinance. The applicant is only proposing a 5'-0" Setback. The applicant states that they are not deviating from the code nor requesting any variances or modifications and the determination letter states that "no deviations from the Venice Coastal Specific Plan have been requested;" however, the application and drawings as submitted are not in compliance with these and several other code requirements and thus would require variances or modifications.

Front Yard. There shall be a front yard of not less than 15 feet in depth in the RD1.5	(7) The provisions of the front yard of the underlying zone shall apply to the Front Lot Line of the perimeter of the subdivision.
----------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------

SETBACK SUMMARY				
PARCEL	FRONT	REAR	SIDE	SIDE
A	17'6" (VERNON)	0'2"	5'0"	5'0" (7TH AVE)
B	5'0" (7TH AVE)	5'0"	0'2"	6'0" (SUNSET)

The setback from the perimeter boundary for Parcel B specifically the front yard on 7th of the subdivision measure less than the yards required pursuant to LAMC Section 12:22 C-27.

2) Prevailing Setback calculation is misapplied

The prevailing setback calculation used for Parcel B's proposed front yard on 7th, which is permissible for the front yard on Parcel A, is not correct or allowed for parcel B. The prevailing setback should not be universally applied on what is normally a side yard setback on 7th Ave. Typically there is a required setback at the rear yard at the alley of 15' for a typical single family residence, if the prevailing setback is to be applied an analysis of how many two story high structures along 7th Ave. would be appropriate that extend into this rear yard setback, should be conducted as a measure of the massing that effect the immediate neighbors on Sunset Court. This project is only 6'-0" from this normal rear yard. We understand that with the small lot subdivision this parcel is now divided, and that parcel B desires a front yard onto 7th street. Therefore, the front yard provision and code requirement of 15' shall apply. The proposed yards on Parcel B are inconsistent with existing patterns of development along 7th Avenue.

3) The parking as proposed is not code compliant

The backup space in the substandard alley at only an improved width of 6.75' is not sufficient and the tandem parking will create a hazardous condition, blocking the substandard alleyway and preventing emergency ingress and egress. Even with the proposed dedication to a width of 13.5' the required back up space as proposed is not code compliant.

4) The LAMC may not permit this maximum approved density

There is an intensification of use by providing 5 parking spaces where 2-3 would normally be required in the zone.

5) Roof access structure is not permissible

In the determination letter it states "no roof access structure is proposed;" however, the plans available online show an enclosed stair penthouse structure, which is not permissible and is not properly setback from the required yards as required by code. This roof access stair penthouse extends to a height of 35' with a flat roof which is not allowable and inconsistent with certified LUP Policy 1.A.1 and lot consolidation restrictions. The code only allows a maximum of 5' for roof access. Furthermore, this stair tower blocks valuable access to sun, natural light and ventilation to neighboring properties. The added height limits provide access to solar energy but put the neighbors' rooftops in shadow and thus block their access to the sun.

6) Building Height

The building height of parcel B shall be setback from the required front yard one foot for every foot in height of 25' considering that the code required yard for parcel B is 15' the project is non in conformance with the height along 7th.

7) Excavation concerns

There are concerns about the proximity of the proposed pools in relation to the most immediate neighbor with respect to noise trespass as well as the practical aspects and liabilities of settlement, vibration etc. associated with a deepened excavation adjacent to the existing older home.

We appreciate your thoughts and consideration to make sure this project is in compliance with not only the letter of the code but the spirit of the code, and that the immediate neighbors' and the community's concerns are appropriately addressed.

Exhibit B:

General Public Comment at APC Hearing July 7, 2021

It has been so disheartening in how this formation of the APC. You seem to be unwilling to apply the certified LUP as the standard of review for all CDPs. Citizens Preserving Venice, an advocacy organization has addressed this at every hearing on Venice applications. We asking you take the time and initiative to study, understand it and apply it correctly. It is your responsibility.

But I want to address another aspect of your responsibility – that is the distinction between a historic resource and a contributor to a historic district as defined by preservationists.

A Historic Resource is given a more rigorous review using criteria found in CEQA based on Federal and local preservation criteria: “properties officially designated or recognized by a local government.”

A Contributor, and this a big distinction: LA Conservancy defines it as “one of the building or site features that give historical districts its significance- a building that was built within the period of significance and that sufficiently retains its historic features.” And further “Individual [i.e, contributing] buildings in a district NEED NOT be historic landmarks, they can derive their association with the district.” This is important because your determinations incorrectly ruled, confusing these definitions destroy these important Venice districts and prejudice the writing of the LCP now going on. And all of Venice should be considered a historic district. SurveyLA missed this important feature.

You constantly ignore this when you allow an Applicant to demolish and build a non-compliant new development, replacing a contributor that plays a critical role in preserving the character of Venice, a special coastal community. 925 Marco is an especially egregious example; it compromised the Walk Street historic district and you made that happen.

To retain an historical district, it must have a significant number of contributors. Every time you allow a developer to demolish an existing contributor you compromise that historic district. That said, it does not mean a proposed project cannot be altered – It must not erase those features that define a contributor. Several designers/architects have successfully designed an addition without removing those defining features.

So, when you see a Contributor, please be cognizant of what a contributor represents. Don’t dismiss it in your deliberations on new development and prejudice the writing of the LCP to preserve the character of Venice.

3/2/21

Re: Request to Appeal

Case no. AA-2018-2001-PMLA-SL

Location: 701&7011/2 Vernon Ave.

Juliet Oh
Senior City Planner
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1186

Dear planning directors and to whom it may concern,

We are concerned neighbors and would like to submit a request to appeal the above referenced project based on numerous concerns we have with the project as outlined below:

Although we obviously received the Directors Determination letter and the subsequent correct letter today, the immediate neighbors were not properly noticed in prior actions with the City specifically neighbors were not aware there was a prior hearing on December 11th, 2019. So this is generally the first time many are reviewing this project with someone of a surprise.

There are so many inconsistencies in the plans and submittal documents with what the code allows that an approval based upon these plans as referenced in an exhibit A which is not included in the letter of determination but was able to be viewed from an online submission. The plans reviewed will require substantial alteration and if approved and referenced as the Exhibit A for subsequent plan conformance, may allow for the false interpretation that the plans were approved by this administrative action, denying neighbors a public process to review the actual proposed project. As such, at a minimum the applicant should be required to submit plans and an exhibit A that are in conformance with what the code actually allows so the final approval has conformity with what is being proposed and for which the basis of the findings is determined.

Some of our concerns included but are not limited to:

1- The Front Yard Setback on Parcel B is incorrect- on 7th is to be 15' as required by the code and specifically as enumerated in Ordinance 185,462 of the small lot subdivision ordinance and the applicant is only proposing a 5'-0" Setback. The

Front Yard. There shall be a front yard of not less than 15 feet in depth in the RD1.5 (7) The provisions of the front yard of the underlying zone shall apply to the Front Lot Line of the perimeter of the subdivision.

applicant states that they are not deviating from the code or requesting any variances or modifications and the determination letter states that "no deviations from the Venice Coastal Specific Plan have been requested", however the application and drawings as referenced as submitted is not in compliance with these and several other code requirements and would require variances or modifications.

SETBACK SUMMARY				
PARCEL	FRONT	REAR	SIDE	SIDE
A	17'6" (VERNON)	0'2"	5'0"	5'0" (7TH AVE)
B	5'0" (7TH AVE)	5'0"	0'2"	6'0" (SUNSET)

The setback from the perimeter boundary for Parcel B specifically the Front yard on 7th of the subdivision measure less than the yards required pursuant to LAMC Section 12:22 C-27.

2) Prevailing Setback calculation is miss applied- The claim to use a prevailing setback calculation for Parcel B proposed front yard on 7th, which is permissible for the front yard on Parcel A is not accurate or allowable. The prevailing setback should not be universally applied on what is normally a side yard setback on 7th ave. Typically there is a required setback at the rear yard at the alley of 15' for a typical single family residence, if the prevailing setback is to be applied an analysis of how many two story high structures along 7th ave. would be appropriate that extend into this rear yard setback, should be conducted as a measure of the massing that effect the immediate neighbors on Sunset Court. This project is only 6-0" from this normal rear yard. We

understand that with the small lot subdivision this parcel is now divided and that parcel B desires a front yard onto 7th street. Therefore the front yard provision and code requirement of 15' shall apply. The proposed yards on parcel B are inconsistent with existing patterns of development along 7th Avenue.

3- The Mello determination is not accurate- As neighbors can attest the owners have been renting out the property although they claim it's vacant to the HCID and have been renting it. There is a front house and a rear unit, both units have continued to be occupied and were also previously rented as affordable units by the prior owners over the last 3 years as evidenced by the neighbors.

4- There are negative cumulative impacts- Due to the loss of a potential contributing existing house and structures, which especially given its prominent corner location and in the context of primarily one story bungalows of contributing character, this project as proposed and if allowed, will forever change this area and cumulatively contribute to an overall loss of the smaller character bungalows that represent the Oakwood community specifically and the character of Venice in general. *This Project is inconsistent with the existing scale and character of the immediate neighborhood* which is largely defined as one story bungalows on all corners of the intersection at 7th and Vernon. We do not believe that the OHR report accurately reflects the importance of the existing residences in the context of the neighborhood and immediate character mass and scale as well as the importance to the community in accordance with CEQA. The local conditions and individual project parameters don't take into consideration the cumulative impacts on the coastal resource of the historic Oakwood section of Venice as well as the important social equity components that should be considered. The property is a potential contributor to a future historical area and has a significant association with the African American community and there has been recent history in regards to the existing residential structures that were not contemplated in the OHR report. Further Survey LA has been deemed to be legally flawed in its evaluation of potential contributors and because it was not included in survey LA is not a basis for its lack of more detailed investigation as to the impact of its loss and the structures, cultural importance. The local conditions and individual project parameters don't take into consideration the cumulative impacts on the coastal resource of the historic Oakwood section of Venice.

5- The parking as proposed is not code compliant -as the back up space in substandard alley at only an improved width of 6.75' is not sufficient and the tandem parking will create a hazardous condition blocking up the substandard alleyway preventing ingress and emergency egress even with the proposed dedication to a width of 13.5' the required back up space as proposed is not code compliant.

6- The LAMC may not permit this maximum approved density- The intensification of use by providing 5 parking spaces where 2-3 would normally be required in the zone.

7-Roof access structure is not permissible- In the determination letter it states there is “no roof access structure is proposed”, however the plans available online, show an enclosed stair penthouse structure which is not permissible and is not properly setback from the required yards as required by codes. This roof access stair penthouse extends to a height of 35’ with a flat roof which is not allowable and inconsistent with Policy 1.A.1 and lot consolidation restrictions. The code only allows a maximum of 5’ for roof access. Further this stair tower blocks valuable access to sun, natural light and ventilation to adding neighboring properties. The added height limits our access to solar energy blocking neighbors rooftops in shadow.

8- The character mass and scale is inconsistent with the immediate massing of the small one story bungalows on all four corners of Vernon and 7th and especially along much of 7th. The massing of the project with the stairwell proposed not setback from the 7th street elevation provides for an unarticulated continuous height of 35’ The continuous un articulated handrails provides for an increased massing along 7th as well.

9) The roof decks as located compromise the rights to privacy- The peaceful enjoyment of adjacent properties and the use of their open rear yards is compromised by the proposed roof deck locations. At a minimum there shall be some conditions required as to allowable hours and ideally the roof decks shall be placed closer to 7th and away from the immediate neighboring properties and back yards to the north and east sides and moved towards the south west and 7th and Vernon towards the public streets.

10) There are concerns about the reduction of open space- Limiting of fire accessibility due to reduced yards and reduction of permeable land areas for onsite water percolation which are inconsistent with the existing scale and character of the neighborhood. The proposed project is inconsistent with the existing pattern of development along 7th and was only considering in the context of Vernon.

11) The project will prejudice the policies of the land use plan- Given the timing as the LCP is in process in a negative way and set a continued precedence for massive new development that change the character of the community.

12) The project is inconsistent with the type of development permitted- For low medium residential land use in the zone. The specifics of the intersection of 7th and Vernon in particular are all one story bungalow scale existing homes. The project as proposed is not visually compatible with the character of this surrounding area. The Massing on 7th ave. in particular is inconsistent with other adjacent developments and will create a significant change to the character mass and scale of this community which importantly is most visually apparent on a corner lot condition where the massing along the length of the property is more public facing than an interior record lot.

14) It would be helpful if there was a landscape plan as part of the approval process so neighbors can be advised as to the like for like replacement and proposed location of new landscaping.

15) **The building height of parcel B-** “ shall be setback from the required front yard one foot for every foot in height of 25’ considering that the code required yard for parcel B is 15’ the project is non in conformance with the height along 7th.

16) **Excavation concerns-** There are concerns about the proximity of the proposed pool in relation to the most immediate neighbor as to noise trespass as well as the practical aspects and liabilities of settlement, vibration etc. associated with a deepened excavation adjacent to the existing older home

We appreciate your thoughts and consideration to make sure this project is in compliance with not only the letter of the code, but the spirit of the code and that the immediate neighbors and communities concerns are appropriately addressed.

Respectfully,

Local Neighbors and Preserve Venice

Notice of interested parties for Coastal Appeal:

Case: DIR-2018-2002-CDP-MEL-1A

1) Rob Huff
705 Vernon Ave.
Venice, Ca. 90291
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2) Joan Huff
705 Vernon Ave.
Venice, Ca. 90291

3) Karen Jones
704 Sunset Ave.
Venice, CA. 902921
khjones1949@yahoo.com

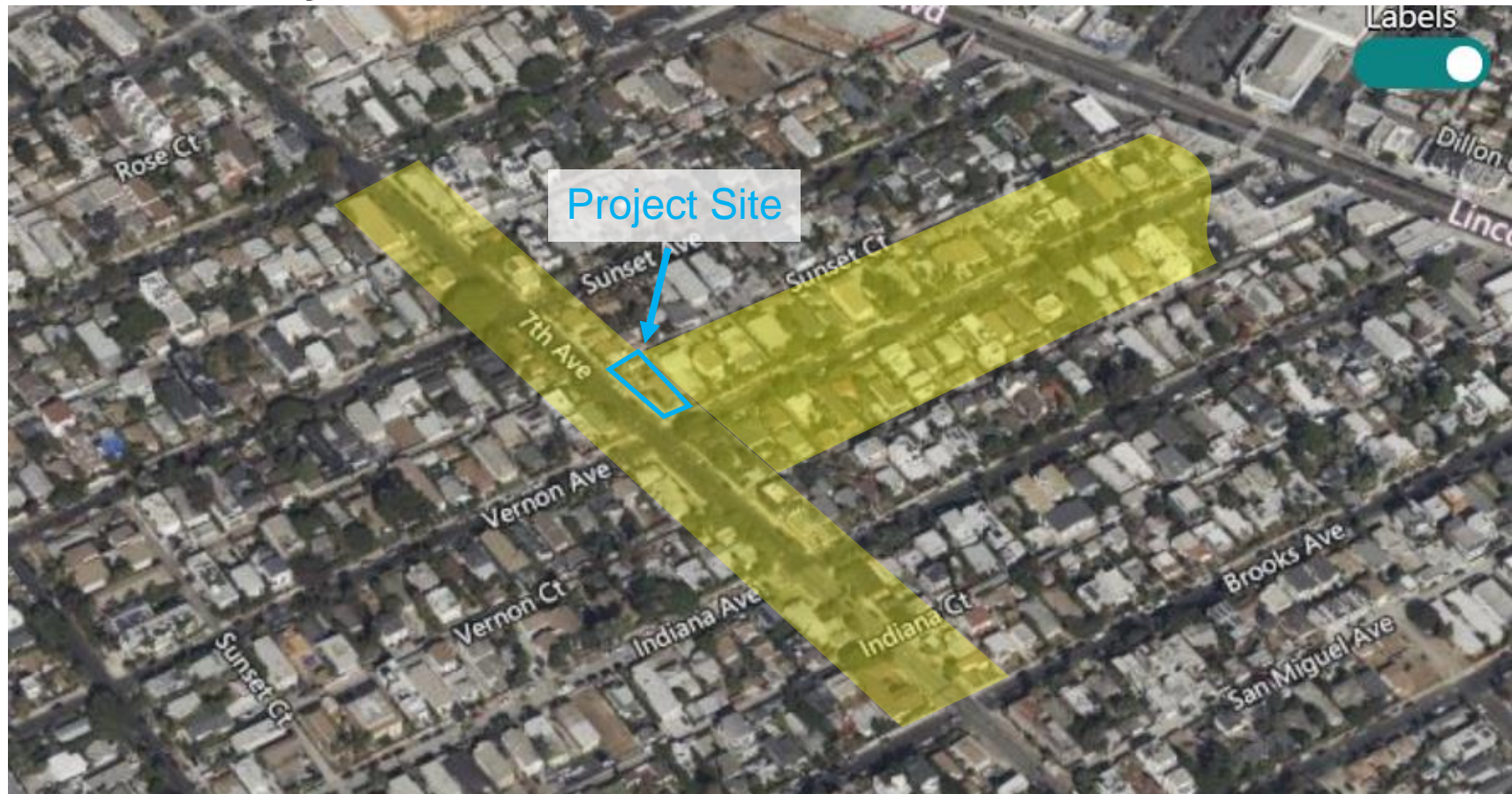
4) 831 LLC.
708 Sunset Ave.
Venice, ca. 90291

5) Preserve Venice
preservevenice@gmail.com

6) David Hertz Architects, inc.
57 Market Street
Venice, Ca. 90291

7) Citizens Preserving Venice
763 Nowita Place
Venice, Ca. 90291

CCC Survey Area



City Survey Area



REVISED
MAP

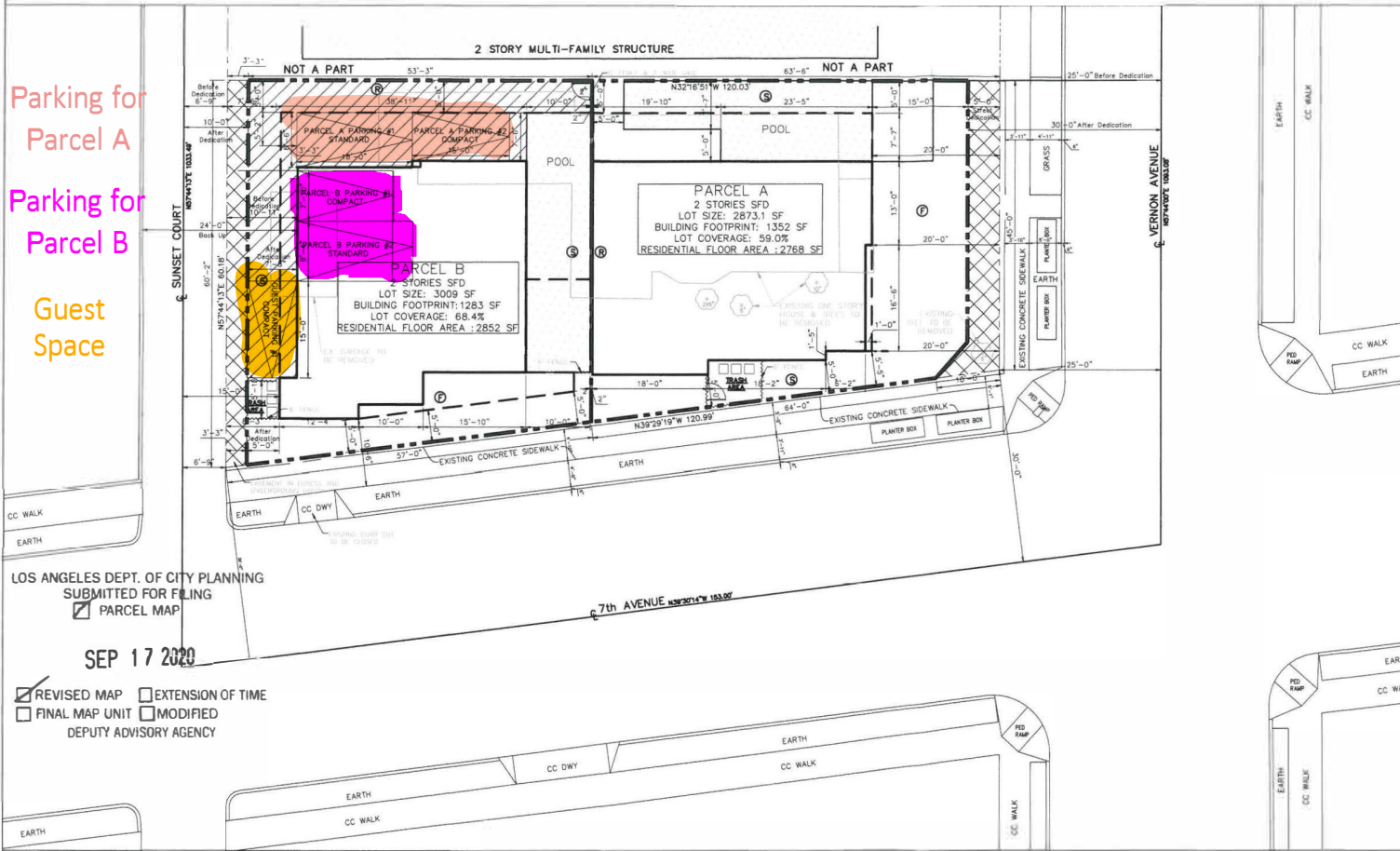
PRELIMINARY PARCEL MAP NO AA-2018-2001-PMLA-SL FOR SMALL LOT SUBDIVISION PURPOSES

701 VERNON AVENUE & 702 SUNSET CT, VENICE, CA 90291

Parking for
Parcel A

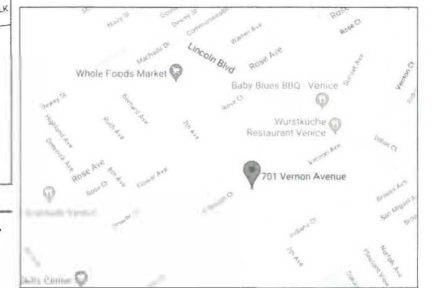
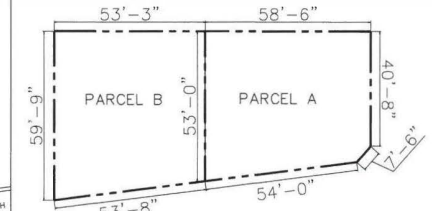
Parking for
Parcel B

Guest
Space



LEGEND	
	NEW PROPERTY LINE (POST DEDICATION)
	EXISTING PROPERTY LINE (PRE DEDICATION)
	FIRST FLOOR LINE
	SECOND FLOOR LINE
	STREET DEDICATION
	FENCE
	COMMON ACCESS EASEMENT
	FRONT, REAR, SIDE YARDS

SETBACK SUMMARY				
PARCEL	FRONT	REAR	SIDE	SIDE
A	20'-0" (PRE-DEDICATION) 15'-0" (POST-DEDICATION) (VERNON AVE)	0'-2"	5'-0"	5'-0" (7TH AVE)
B	5'-0" (7TH AVE)	5'-0"	0'-2"	8'-3" (PRE-DEDICATION) 5'-0" (POST-DEDICATION) (SUNSET CT)



EXISTING SITE:

ADDRESS: 701 E VERNON AVE. & 701 1/2 E VERNON AVE.
VENICE, CA 90291
ASSESSORS PARCEL NO.: 4240-016-076
BRIEF LEGAL DESCRIPTION: LOT 49 OF TRACT NO. 1694, M.B. 21/123
LAND AREA: 6,312 SQ FT (0.144 ACRE)
EASEMENT NOTE: THERE ARE NO EASEMENTS PER THE PROVIDED PRELIMINARY TITLE REPORT FROM FIDELITY NATIONAL TITLE COMPANY, ORDER NO. 00179434-994-VNO-SI, DATED 9/26/17.
EXISTING ZONING: RD1.5-1
PROPOSED ZONING: RD1.5-1
LAND USE DESIGNATION: LOW MEDIUM II RESIDENTIAL

CONCURRENT CASE:

DIR-2018-2002-COP-MEL

NOTES:

- SMALL LOT SINGLE FAMILY SUBDIVISION IN THE RD1.5-1 ZONE, PURSUANT TO SMALL LOT ORDINANCE NO. 185,462
- PROPERTY LOCATED WITHIN THE OAKWOOD SUBAREA OF THE VENICE SPECIFIC PLAN.
- GROSS LOT AREA = 8312 SF - NET LOT AREA = 5935 SF
- PARCEL A = 2873.1 SF - PARCEL B = 3051.8 SF
- PARKING SPACES: 5 (2 PER DWELLING UNIT + 1 GUEST)
- PROJECT INCLUDES DEMOLITION OF THE EXISTING SINGLE FAMILY DWELLING AND GARAGE AND CONSTRUCTION OF 2 NEW SINGLE-FAMILY HOMES.
- NO OAK, WESTERN SYCAMORE, CALIF. BAY OR S.C. BLACK WALNUT TREES ON PROPERTY. ALL ONSITE TREES TO BE REMOVED.
- PROPERTY IS IN LIQUEFACTION ZONE
- PROPERTY IS WITHIN THE VENICE COASTAL ZONE SP.
- MAX HEIGHTS OF HOUSES SHALL BE MEASURED FROM THE CENTERLINE OF STREET THEY ARE FRONTING. MAX HEIGHT OF PROPOSED STRUCTURE NOT TO EXCEED 25 FT FOR FLAT ROOF AND 30 FT FOR VARED ROOFLINE (SLOPE GREATER THAN 2:12); PORTIONS EXCEEDING 25 FT IN HEIGHT SHALL BE STEPPED BACK AT LEAST 1 FT FOR EVERY 1 FT INCREASE FROM THE REQUIRED FRONT YARD (FRONT LOT LINE).
- THERE IS NO EASEMENT ON THE SUBJECT PROPERTY EXCEPT AS SHOWN.
- COMMON ACCESS EASEMENT TO BE PROVIDED FOR PARKING ACCESS AS SHOWN.



1 PARCEL MAP
FULL SIZE PLOT SCALE: 1/8" = 1'-0"
HALF SIZE PLOT SCALE: 1/16" = 1'-0"
0' 4' 8' 16'

AA - 2018 - 2001

CONTACT INFO:

OWNER/BUILDER: ZOI CALL LLC (818-574-0606), 17200 VENTURA BLVD, #301, ENCINO, CA 91316
DESIGNER: ALON ZAKOOT ON BEHALF OF ALLIANCE TEAM REALTY, INC. (818-574-0606) ALONZ.ATR@GMAIL.COM

2 VICINITY MAP
SCALE: N.T.S.
TRUE NORTH

THESE PLANS ARE COPYRIGHT PROTECTED BY ALLIANCE TEAM REALTY, INC.