

CALIFORNIA COASTAL COMMISSION

South Coast District Office
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W14b

A-5-VEN-21-0052 (LA Riverstonegrey, LLC)

September 8, 2021

EXHIBITS

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Exhibit 1 – Vicinity Map and Project Site



Exhibit 2 – Appeal

Appeal of local CDP decision

Page 2

1. Appellant information:

Name: Citizens Preserving Venice
Mailing address: 3003 Ocean Front Walk, Venice, CA 90291
Phone number: 310-721-2343
Email address: wildrudi@mac.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 a letter and spoke at city 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:

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: allowed by law to appeal to the coastal commission

† 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
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2. Local CDP decision being appealed²

Local government name: Los Angeles
Local government approval body: Planning Director
Local government CDP application number: DIR-2019-5257-CDP-MEL
Local government CDP decision: ☒ CDP approval ☐ CDP denial³
Date of local government CDP decision: MAY 19, 2021

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

Describe: 628 Santa Clara, Venice
Demolition of two single-family dwellings and the construction of a new
2-story 3,254 square foot single-family dwelling with an attached 2-car
garage, roof deck and a 581 square foot Accessory Dwelling Unit (ADU),
with 3 parking spaces.
APN: 423-902-9010

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
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3. Applicant information

Applicant name(s):

LA Riverstonegrey, LLC

950 Main Street, 4th Floor

Applicant Address:

Cleveland, OH 44113

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
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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.

Robin Rudisill, Treasurer, on behalf of Citizens Preserving Venice

Print name _____

Signature _____

July 23, 2021

Date of Signature _____

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.

628 Santa Clara Ave, Venice

5-VEN-21-0047

REASONS SUPPORTING THIS APPEAL

July 23, 2021

A. SUMMARY OF REASONS FOR THE APPEAL

The City erred and abused its discretion by allowing the loss of existing multi-family housing in the Oakwood subarea and by allowing an inadequately sized ADU to maintain density instead of requiring replacement of the two units. Preservation of existing housing stock is one of the main Venice Coastal Issues as per the certified LUP (page I-3).

The 600 block of Santa Clara has a mix of single-family dwellings and multi-family housing and is currently 55% multi-family. Losing this duplex would result in a significant adverse cumulative effect on multi-family housing in the Oakwood Subarea of the Venice Coastal Zone.

Certified LUP Policy I. A. 7.:

Multi-family Residential – Low Medium II Density

Use: “Duplexes and multi-family structures”

Density: “One unit per 1,500-2,000 square feet of lot area.”

The proposed project for the construction of a single-family dwelling of 3,254 square feet, with an ADU of 581 square feet does not conform with the certified LUP Policy I.A.7. requirements noted above and thus would prejudice the ability of the city to prepare a Coastal Act Chapter 3 compliant LCP. This is a large single-family dwelling with tiny accessory unit (17% of the size of the single-family dwelling) in an area with a multi-family housing coastal land use designation. As per the Coastal Commission’s findings for prior permits, small ADUs do not address the loss of density resulting from a proposed development that demolishes multi-family housing for purposes of a single-family dwelling.

Also, permitting a new single-family dwelling would have a significant adverse cumulative effect on the character of the area, for which the coastal land use designation is for multi-family housing, as well as on housing density. Besides the small size, the ADU is extremely unlikely to be used as a separate unit.

B. PRIOR COMMISSION RESPONSES TO THE LOSS OF DENSITY AND THE USE OF ADUs:

At the June 12, 2020 hearing for Agenda Item 17b, the following comments were made regarding the adverse cumulative effects on housing and affordable housing by using ADUs to maintain density:

"Until recently, the accepted status quo has been to effectively downzone and/or allow projects to strip neighborhoods of existing density, affordable character and sense of community. Venice in particular has been burdened by these unfortunate land use decisions, contributing to de-densification and displacement. This cumulative impact has been measurable and observable over the course of decades, and it must be addressed."
--Jason P. Douglas, Senior Deputy for Planning, Councilmember Bonin for Council District-11: 04:30:59, speaking in support of the appeal

"... I'm moved by the fact that he [Bonin] is concerned about this. I think the reduction in affordable housing is still an issue, because even if you build the ADU...they don't have to be rented."
--Commissioner Diamond: 05:03:2

Also, as per a recent Coastal Staff Report (5-19-1220):

"...in light of a persisting lack of housing supply across the state (particularly in the coastal zone), it has become apparent that replacement of a full housing unit with an ADU/JADU is likely an insufficient approach to preserving housing density in the Coastal Zone."

"...due to their size, ADUs are more easily left vacant or used by the residents of the primary single-family residence, rather than rented out."

"...ADUs do not necessarily provide a meaningful residential unit that is comparable to a unit in a duplex or multi-family structure and is not likely to adequately mitigate the impact of removal of a multi-family structure. Thus, the project as proposed with only one residential unit and an ADU is not consistent with Sections

30250 and 30253 of the Coastal Act.”

“In light of a persistent lack of housing supply across the state and in the coastal zone, it has become apparent that replacement of a full housing unit with an ADU/JADU may not always preserve housing density in the Coastal Zone in a manner consistent with Chapter 3 policies. ADUs/JADUs are important mechanisms to increase the potential number of independent housing units that can be rented out separately from the primary residence. However, ADUs are dependent on the single-family residence to serve as a housing unit and cannot be sold separately from the primary residence. This differs from a duplex, where the units can have separate utility connections and can be sold independently from one another... ADUs are more easily left vacant or used by the occupants of the primary residence. Therefore, there is no guarantee that an ADU will be used or rented out as a second unit...”

C. USE OF ADUs TO MAINTAIN DENSITY WOULD RESULT IN A LOSS OF DENSITY AND WOULD NOT PRESERVE OVERALL DENSITY IN AN AREA ABLE TO ACCOMMODATE IT.

The project involves a change from 2 single-family dwellings/ duplex to one single-family dwelling and tiny ADU (that is not required to be rented or used for a dwelling unit) in an existing developed area designated for multi-family residences. There is no evidence provided that shows that the accessory dwelling unit mitigates the loss of this multi-family dwelling unit, particularly an ADU of this small size—only 581 square feet, approximately the size of a Junior ADU. Therefore, the project does not preserve overall density and causes an adverse cumulative effect.

The use of an ADU, which is not required to be rented or used for a dwelling unit, to replace the existing second single-family dwelling does not mitigate the loss of a normal housing unit. An ADU is an accessory use to the single-family dwelling, not necessarily a separate housing unit. According to State ADU law, the purpose of ADUs is to increase density by creating new accessory dwelling units in order to provide additional rental housing stock, to increase the supply of the state’s housing stock and cause an increase in dwelling units. The purpose is not to act to supposedly maintain density by replacing a multi-family housing unit with an accessory dwelling unit that is not even required to be rented or used for a dwelling

unit--use of the ADU as a separate rental unit is not required by law and not enforced by the city or the Coastal Commission. As a result, when using an ADU as a replacement for a multi-family dwelling unit, the actual practice has generally been that it is just used as a part of the single-family dwelling and not as a separate rental unit.

An ADU in the place of a second multi-family residential unit should not be allowed in our multi-family neighborhoods. ADUs are an accessory use and generally are much smaller than a residential unit and also do not require a parking space. It's clear from experience "on the ground" that most ADUs cannot house a family and are more likely than not to be used as a bedroom, guest room, family room, playroom, den, office, etc. for the single-family dwelling.

Coastal Act Section 30253 protects Venice as a Special Coastal Community and Coastal Resource and requires that new development be compatible with the unique character of the neighborhood. This proposed project for one single-family dwelling with an ADU that is not required to be rented or used as a dwelling unit is not compatible with the neighborhood because the area consists primarily of multi-family residences (55%). See evidence at EXHIBIT A.

The approval of the change from two single family dwelling units to one single family dwelling unit plus a tiny 581 square foot ADU that is not required to be rented or used as a dwelling unit, without any analysis of the impacts of the loss of housing density in the area, fails to preserve and protect the density and character of the multi-family neighborhood in which the subject site is located. LUP Policy I.A.7. stipulates that allowed Uses on lots designated Multi-Family Residential - Low Medium II density consist of *"Two units per lot, duplexes and multi-family structures."* (and does not include single-family uses).

The policies of the LUP specifically designate areas in Venice that are more appropriate for duplexes and multi-family developments. LUP Policy I.A.5. requires the protection and preservation of existing multi-family neighborhoods. In this case, the project site is in the Oakwood subarea and is designated Multi-Family Residential - Low Medium II density in the LUP. The project would result in a loss of one multi-family dwelling unit; therefore, approval of the project would be inconsistent with LUP Policies I.A.5. and I.A.7. and Coastal Act Section 30250 as it would not preserve overall density in an area able to accommodate it and the project would result in the loss of housing density in an existing developed area designated by the LUP as appropriate for more dense development. The loss of one unit may not seem significant on its own but there

have been numerous projects involving loss of housing density in Venice; thus, the cumulative effects of loss of housing density in Venice is a concern. As a result, the Coastal Commission has been raising a substantial issue with respect to projects such as this involving a loss in density.

As mentioned above, the LUP coastal land use designation indicates only Duplexes and Multi-Family Dwellings (and not single-family dwellings) as Uses. It is very purposeful in the state ADU law that a single-family residence with an ADU is not a duplex or multi-family structure and that the single-family dwelling with ADU is still considered a single-family residence (with an accessory use) for all land use/zoning purposes. The fact that there is an attached ADU does not change the fact that the project is for a single-family dwelling, which is not included as a Use by the Multi-Family Residential Low Medium II coastal land use designation. Another reason that single-family residences with an ADU are single-family in character is that there is no requirement in the law for the owner to rent the ADU as a separate unit or use it as a dwelling unit, and the facts on the ground are that many and perhaps most, especially when attached to the single-family dwelling as in this case, incorporate the ADU as a part of their single-family dwelling as an extra bedroom, guest room, family room, playroom, den, office, etc., resulting in what amounts to an even larger single-family dwelling than would otherwise be permitted by zoning regulations. The total structure, including the ADU must be analyzed for visual compatibility. In addition, ADUs are generally not large enough to provide adequate family housing, which is the kind of housing stock especially needed in the Venice Coastal Zone.

D. ERRORS AND ABUSE OF DISCRETION IN CITY CDP FINDINGS – LACK OF FACTUAL AND LEGAL SUPPORT TO FIND THAT THE DEVELOPMENT IS IN CONFORMITY WITH CHAPTER 3 OF THE COASTAL ACT.

FINDING 1

The city erred and abused its discretion in approving the project because the development is NOT in conformity with Chapter 3 of the California Coastal Act of 1976 because:

1. There is a lack of factual and legal support for the decision and thus it cannot be determined whether the project conforms with Chapter 3 of the Coastal Act with respect to community character and visual resources.
2. Consideration of adverse cumulative impacts was erroneously omitted.
3. The proposed project would result in a loss of density and would not

preserve overall density in an area able to accommodate it, and thus is inconsistent with Coastal Act Section 30250, resulting in an adverse cumulative effect on density.

1. Coastal Act Section 30251 requires a proposed project to be visually compatible with the character of the surrounding area.

The city erred and abused its discretion in its Findings with respect to visual compatibility as it did not adequately consider the actual evidence on the surrounding block or make logical conclusions based on the evidence.

The project removes two single-family dwellings, one 1,112 square feet and the second 602 square feet, and replaces them with a 3,254 square foot single-family dwelling and a 581 square foot ADU. The single-family dwelling will have three required parking spaces, the ADU will have none. The 581 square foot ADU may be close in size to the smaller 602 square foot unit being demolished; however, without a parking space and without a permanent requirement to keep the ADU as a rental unit, the ADU is not equivalent to the unit being lost.

Appellant's Findings using the Substantial Evidence in the Streetscape at EXHIBIT A:

Of the 40 parcels on the 600 block of Santa Clara, 18 are single-family dwellings. The 22 parcels with multi-family dwellings range from duplexes to an apartment building of 17 units. The average size of the multi-family units is approximately 1,000 square feet.

Under the Coastal Act and its certified LUP guidance, the mass and scale of the entire structure must be considered in analyzing visual compatibility. The total square footage of the structure includes 3,254 square feet for the single-family dwelling, 230 square feet for the garage, and 581 square feet for the ADU = 4,065 square feet. The average size structure for the block is 1,939 square feet. The proposed structure is over 2 times larger than the average for the block! The city erred and abused its discretion in that it did not adequately evaluate the compatibility of the project with the mass, scale and character of the surrounding neighborhood.

For the reasons stated above, the development is not compatible with the mass, scale and character of the surrounding development and sets a precedent that could result in the replacement of the multi-unit structures in the vicinity with

single-family homes, a loss of residential density, as well as construction of structures that are materially beyond the scale of and out of character with the surrounding community. The extent and scope of the development is inconsistent with the existing pattern of development and is, therefore, inconsistent with the community character policies of Chapter 3 of the Coastal Act.

The LUP policies seek to preserve and maintain existing housing stock by requiring duplexes and multi-family developments in areas identified by the LUP for such development (Policies I.A.5. through I.A.8.). LUP Policy I.A.5. requires the preservation and protection of multi-family residential neighborhoods. The project directly contradicts this as it fails to preserve and protect the multi-family neighborhood. The project is also inconsistent with Policy I.A.7., which indicates uses of duplexes and multi-family structures in this coastal land use area. Approval of the proposed development is not in conformance with these policies of the LUP designed to maintain the character of stable multi-family neighborhoods, and as such is further inconsistent with the mandates of Section 30251 that new development be consistent with the character of the surrounding area. Furthermore, the loss of existing housing stock/density and the failure to preserve the character of the surrounding multi-family area are inconsistent with the Coastal issues identified in the LUP.

2. Coastal Act Section 30253 requires a proposed project to protect the character and scale of the Special Coastal Community of Venice.

The adverse cumulative impact and change to the character and scale of the neighborhood of the loss of multi-family housing were not considered with respect to protection of Venice as a Special Coastal Community and Coastal Resource.

The city's Chapter 3 findings do not address (and even seem to purposefully omit and evade) Coastal Act Section 30253(e) and certified Land Use Plan Policy I.E.1. re. the protection of Venice as a "Special Coastal Community." Thus, Finding 1. does not support the determination that the project complies with Chapter 3 of the Coastal Act. There is no consideration of Venice as a "Special Coastal Community" as required in Coastal Act Section 30253(e) and Policy 1.E.1 of the LUP.

Coastal Act Section 30253 Minimization of Adverse Impacts:

New development shall ... (e) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are proper visitor destination points for recreational uses.

LUP Policy 1. E. 1. General. Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

The Coastal Commission has previously found that Venice's unique social and architectural diversity should be protected as a Special Coastal Community.

The city erred and abused its discretion by not making a finding regarding Coastal Act Section 30253 and LUP I.E.1. to protect the character of Venice, a Special Coastal Community, which is primarily residential.

The project does not protect and preserve the existing character of this residential area. The existing character is defined, in part, by the multi-family residences in the project vicinity. The project would contribute to the adverse precedent for replacement of multi-family residences with single-family residences, which, cumulatively, would change the character of the surrounding area, which is protected through the visual resource and special coastal community policies of the Coastal Act and LUP.

There is no mention in the findings of the fact that the Coastal Commission has designated Venice as a Special Coastal Community, a Coastal Resource to be protected. The fact is that this project would harm the Special Coastal Community, Coastal Resource of Venice as it is over 2 times larger than the average size structure on the block, materially out of scale with the surrounding neighborhood.

In addition, the loss of the existing older, multi-family, lower income housing, replaced by the proposed high-end luxury home would significantly change the character and social diversity of the neighborhood. The proposed development is inconsistent with LUP Policy I.E.1., which protects the social (and architectural) diversity of Venice as a Special Coastal Community pursuant to Section 30253(e) of the Coastal Act. Also, Coastal Act Section 30604(f)(g)(h) of the Coastal Act requires encouraging lower-cost housing opportunities. The city CDP determination authorizes the removal of multi-family housing and sets an adverse precedent for future development by allowing displacement of lower-income

residents, thereby disrupting the social diversity and community character of this area and prejudicing the city's ability to prepare an LCP.

Jack Ainsworth, at the August 12, 2015 Commission meeting:

"...the certified Land Use Plan...includes really robust policies for protection of affordable housing. And they require replacement at a one-to-one ratio within the community, very robust...one of the reasons why they have such protective policies of affordable housing was that in the LUP they make the connection of a very socially diverse community as being sort of the fabric of that community and the character of that community and that supports that idea of this diverse community. So, if you don't have this affordable housing...you lose the character of Venice which everyone comes from around the world to experience."

The project is not consistent with the Special Coastal Community protection policies of the Coastal Act with respect to social diversity, which is directly impacted by the loss of lower income housing.

3. Consideration of adverse cumulative effects was erroneously omitted from the findings.

The Coastal Act Chapter 3 requires consideration of cumulative effects for all development.

Coastal Act Section 30250 states:

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.

Coastal Act Section 30105.5 defines cumulative effect:

"Cumulatively" or "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.

In Finding 1 of the city's CDP, the cumulative adverse effect of this proposed project is not considered, which is an error and abuse of discretion. This is indicative of a pattern and practice by the city of failing to consider adverse cumulative effects in the Venice Coastal Zone and thus erroneously approving projects that could cause adverse cumulative effects. The city cannot in essence rewrite the Coastal Act to exclude consideration of adverse cumulative effects. Both individual and cumulative effects must be considered.

Maintaining and increasing housing density has not always been a priority in the Coastal Zone. However, the state is currently experiencing a housing supply shortage of approximately 90,000 units on a yearly basis. From 2000 to 2015, Venice saw a reduction in housing by approximately 700 units! Also, *there is an apparent trend of multi-unit structures being redeveloped as single-family residences.* Expected population growth, assuming that current trends remain unchanged, will exacerbate the housing shortage in Venice. Housing shortages throughout the state have been met with growing efforts to address and improve availability. There have been ongoing significant legislative efforts to alleviate the housing crisis. Thus, the Coastal Commission has been rightfully emphasizing the importance of preserving existing housing stock in the Coastal Zone to minimize impacts to coastal resources (Coastal Act Section 30250), encourage affordable housing (Coastal Act Section 30604(f)), and reduce traffic impacts and encourage use of public transportation and public access (Coastal Act Section 30253). The LUP policies also seek to preserve and maintain existing housing stock by providing for duplexes and multi-family developments in areas deemed appropriate to sustain such development (Policies I.A.5. through I.A.8.).

In order for any development to be approved in the Coastal Zone it must not have significant adverse individual or cumulative effects. The city erred by not concluding that the demolition of two single-family dwelling units/a duplex would cause a significant adverse cumulative effect in this multi-family subarea and immediate neighborhood. If approved, other similarly sized lots with multi-family residences within this area could redevelop the lots with single-family residences. The project, when viewed cumulatively with past similar projects in the area could set a precedent for redevelopment of other surrounding multi-family residences with single-family residences, which would essentially downzone an area that is intended to provide multi-family dwellings under the certified LUP.

Given that the subject lot can accommodate two residential units, approving a single-family residence (even with an ADU) has the potential to set a negative precedent with respect to housing density and the character of the surrounding multi-family neighborhoods. The loss of multi-family housing for this project, together with a significant number of other similar projects in Venice that have been approved in the past few years and the probable future similar projects is causing an adverse cumulative effect on the character of the surrounding multi-family neighborhoods and on housing density in the Venice Coastal Zone.

The character of the neighborhood supports the maintenance of existing multi-family housing units, consistent with Coastal Act Section 30250 with regard to development in areas that can accommodate it.

One of the primary issues for this project is the potential adverse cumulative effects on community character. The development of a single-family residence in this area could have a cumulative impact on the overall character of the surrounding area, inconsistent with Sections 30251 and 30253 of the Coastal Act. Venice has been identified by the Coastal Commission as a unique Coastal Resource. The cumulative effects of the development, including the potential loss of affordable housing stock, and development of new single-family residences that are out of character with the area surrounding the project site and would not be in conformance with LUP policy I.A.7. and would have significant impacts on visual resources as well as the community character of Venice, which are significant coastal resources that would be adversely affected by this project.

Review of a project's incremental effects does not only mean determining whether the impacts of a project can be identified as a single "increment" among many others. It also means considering the probability that the project may serve to promote more such projects with further "incremental" impacts. In other words, the project may ultimately have an outsize effect and adverse cumulative impact, *especially when it provides a key to unlock a new development paradigm in a location, such as single-family homes in an area with a Multi-Family Residential Coastal Land Use Designation.*

Thus, the city erred and abused its discretion in not finding that there is a cumulative effect on these multi-family neighborhoods.

FINDING 2

Section 30604(a) of the Coastal Act provides that the Commission shall issue a

coastal development permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program (LCP) that conforms with Chapter 3 policies of the Coastal Act.

The city erred and abused its discretion by permitting the demolition of multi-family housing for purposes of the construction of one single-family dwelling and tiny ADU that is not even required to be rented or used as a dwelling unit, in a R1.5-1 zone, as this is not in conformance with the applicable multi-family coastal land use designation development standards for Use (Duplexes and multi-family structures) and Density (One unit per 1,500 square feet of lot area) in LUP Policy I.A.7. Any decision that does not conform to the certified LUP would prejudice the ability of the City to prepare a LCP that conforms with the Chapter 3 policies of the Coastal Act. Thus, the project will prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformance with Coastal Act Chapter 3.

The city erred and abused its discretion in stating that the proposed project is consistent with the policies and development standards of the LUP and will not prejudice the ability of the city to prepare an LCP that is in conformity with Chapter 3 of the Coastal Act.

FINDING 3

As indicated in the first paragraph under this Finding, on page 13 of the City's CDP, the guidelines are intended to be used with consideration of both individual and cumulative impacts on coastal resources.

There was no analysis of cumulative impacts done by the city for this project.

Therefore, the city erred and abused its discretion in that there is no evidence included in this Finding that the project complies with the Regional Interpretative Guidelines and there is no analysis of whether there are individual and cumulative impacts of this project on Coastal Resources.

FINDING 4

Consideration of the prior CDP decisions shown on pages 13-14 of the city CDP clearly shows an adverse cumulative effect resulting from projects that reduce density in the Venice Coastal Zone. When the incremental effects of this proposed individual project are reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, an

adverse cumulative effect is occurring due to the substantial cumulative loss of dwelling units and change in character of the neighborhood from multi-family to single-family housing. Therefore, this Finding, again, shows that the project should not be approved.

The fact that any of the Commission and the City approved the projects listed on pages 13-14 of the CDP allowed for a decrease in density does NOT mean that ongoing projects should or can keep doing so in order to be consistent. Government agencies are not estopped from making a decision in applying the law for a current decision just because a prior decision was made that was not in conformance with the law, or that was at the far end of the spectrum from the current decision, as long as the facts and substantial evidence support the current decision, which would result in denial of the permit due to significant adverse cumulative effects, as is the case here for all of the reasons stated above. In addition, as the state is currently experiencing a housing supply shortage of approximately 90,000 units on a yearly basis and as there is an apparent trend of multi-unit structures being redeveloped as single-family residences, the Coastal Commission has been rightfully emphasizing the importance of preserving existing housing stock in the Coastal Zone to minimize impacts to coastal resources.

The Coastal Commission's decision for A-5-VEN-20-0039 supports this appeal. This decision strongly rejected a demolition of a duplex for a single-family dwelling with a 437 square foot JADU stating that the loss of a 1,000 square foot multi-family unit was not equal to the "gain" of a JADU. See EXHIBIT B.

The Coastal Commission's decision for A-5-VEN-21-0010 supports this appeal. In this case the city denied a project for the demolition of a single-story duplex for purposes of a single-family home with an attached 860 square foot ADU. That decision also uses adverse cumulative effects of such an approval as a reason to support denial of the project. See EXHIBIT C.

E. ENVIRONMENTAL JUSTICE

The California Legislature amended the Coastal Act, specifically Section 30604, for the Commission to consider environmental justice (as defined in Sections 30113 and 30107.3) and encourage lower cost housing opportunities.

The Coastal Commission's Environmental Justice Policy states:

"The Commission recognizes that the elimination of affordable residential neighborhoods has pushed low-income Californians and communities of color further from the coast, limiting access for communities already facing disparities with respect to coastal access and may contribute to an increase in individuals experiencing homelessness."

The loss of lower cost or affordable housing must be evaluated based on the Coastal Act's Environmental Justice provisions and related policy in consideration of this appeal.

We've seen our multi-family neighborhoods be decimated over and over again, with approval after approval of single-family dwellings that replace existing multi-unit residential structures, which has caused and continues to cause a particularly detrimental impact on our lower income residents and long-term renters.

With the housing crisis worsening, losing multi-family housing and building a single-family dwelling with tiny ADU in its place is not consistent or compatible with the character of the immediate neighborhood, is a dangerous precedent, and presents a significant adverse cumulative effect of loss of lower cost housing for all of Venice and especially for its multi-family neighborhoods.

F. RECOMMENDATION

Please find Significant Issue and give your staff an opportunity to preserve our housing stock and protect our multi-family neighborhoods by making a recommendation on de novo review that could help to reverse this growing adverse cumulative impact of using small ADUs to maintain density.

EXHIBIT A

Parcel Information from L.A. Assessor's Files												Calculations		
Number	Address	Lot Size	Bldg #1 (SF)	# Units	Bldg #2 (SF)	# Units	Bldg #3 (SF)	# Units	Bldg #4 (SF)	# Units	Total Units	Total Size (SF)	Ave Size of Small Units	Total Size of Rental Units
1	602	7,798	3,170	5							SFR	3,170		
2	608	7,800	5,040								5	5,040	1,008	5,040
3	612	5,199	772		967						2	1,739	870	1,739
4	618	5,202	444		1,372						2	1,816	908	1,816
5	622	5,199	1,674		2,444	4					5	4,118	824	4,118
6	624	5,199	2,075	3							SFR	2,075		
7	628	5,201	1,112		602						2	1,714	857	1,714
8	630	5,200	3,318								3	3,318	1,106	3,318
9	632	5,198	3,280								4	3,280	820	3,280
10	638	10,401	1,050		1,050	2	1,050	2	1,050	2	8	4,200	525	4,200
11	648	5,199	1,684	4							SFR	1,684		
12	652	5,202	837								SFR	837		
13	656	5,198	1,044		881						2	1,925	963	1,925
14	658	4,908	4,162								SFR	4,162		
15	675	4,096	1,590								SFR	1,590		
16	717 Calif	8,206	773	4							SFR	773		
17	601	5,168	1,190		734		734				3	2,658	886	2,658
18	605	5,167	4,216								4	4,216	1,054	4,216
19	611	5,169	3,255								SFR	3,255		
20	613	5,170	3,644								SFR	3,644		
21	615	5,173	2,688	4	1,041						2	3,729	1,865	3,729
22	621	5,174	1,424		1,370						2	2,794	1,397	2,794
23	625	5,177	1,260								SFR	1,260		
24	627	5,178	3,547								4	3,547	887	3,547
25	633	5,177	3,200								SFR	3,200		
26	635	5,182	1,830	2							2	1,830	915	1,830
27	639	5,182	1,183								SFR	1,183		
28	641	5,184	889								SFR	889		
29	643	5,186	676		1,652						1	2,328	2,328	2,328
30	645	5,185	2,635								SFR	2,635		
31	647	5,188	392	3	1,348						2	1,740	870	1,740
32	649	5,191	820		484		360				3	1,664	555	1,664
33	663	5,192	927								SFR	927		
34	667	5,192	899		3,094						2	3,993	1,997	3,993
35	671	5,196	2,054								3	2,054	685	2,054
36	677	15,594	13,216	17							17	13,216	777	13,216
37	691	5,201	1,014								SFR	1,014		
38	695	5,199	493		2,632						2	3,125	1,563	3,125
39	739 Calif	2,953	3,112								SFR	3,112		
40	741 Calif	2,838	3,012								SFR	3,012		
		225,422										112,466	23,657	74,044
		5,636									AVERAGE ON LOT 80	2,812	1,075	926
											AVERAGE OF STRUCTURES	1,939		
											Single-family	18	45%	
											Multi family	22	55%	
												40		
Average FAR of block		0.499												

EXHIBIT B

A-5-VEN-20-0039 (Holzman) - 714-716 E Palms Blvd., 08/07/2020

Appeal – Substantial Issue

Project is demolition of existing duplex and construction of a single-family dwelling and attached JADU. Staff Report is a strong rejection of conversion of duplexes to single-family dwelling and attached JADU on cumulative effects grounds.

In this case, the lot is currently developed with a duplex. Thus, as contended by the appellant, the city-approved demolition of the existing duplex and construction of a single-family residence with an attached JADU will result in the loss of one approximately 1,000 square foot residential unit, which was not addressed by the city in the context of preservation of Venice housing density. Of the 25 original structures shown in Table 3, 64% are currently multi-family dwellings. This percentage decreases to 51% multi-family dwellings when including all recent city and Commission actions in the surrounding area. The Commission found a pattern of locally approved reductions in housing density, manifesting in the construction of single-family residences on lots able to accommodate multiple units.

Staff indicated that approval of this project would contribute to the cumulative effect of reducing the housing density of the neighborhood community character. This suggests that the current project may set a precedent for future development in the area and become one of multiple, similar developments. These potential future projects would further amplify the adverse cumulative effects discussed so far.

The Commission found that the loss of residential density posed by the demolition of the existing duplex is not adequately and that the city-approved development that results in the loss of housing stock in a neighborhood specifically designated for higher density development could have significant effects on the community character of Venice, which is a significant coastal resource.

In conclusion, the Commission found that the city's approval sets a harmful precedent for the continued conversion of the multi-family residential neighborhood to a single-family neighborhood without offsetting the loss of units in the multi-family neighborhood or elsewhere in the Venice Coastal Zone.

EXHIBIT C

A-5-VEN-21-0010 (Miles) - 426-428 Grand Blvd., 01/13/21 Appeal - No Substantial Issue

Commission supports City denial of project for demolition of a single-story duplex for a 3-story single-family dwelling and attached ADU.

The proposed development includes the demolition of a single-story duplex, and the construction of a 3-story, 35 foot high, 3,977 square foot single-family home with an attached 860 square foot ADU, attached 4-car garage and roof deck.

The city denied the project on the grounds of community character, indicating that given the recent pattern of development, there is a potential for cumulative effects to the neighborhood's community character, particularly given the fact that the development potential of this site under LUP Policy I.A.7 is up to three (3) residential units.

The City's denial includes findings that the demolition of the duplex and construction of the single-family residence with an ADU is inconsistent with LUP Policies I.A.5 and 1.A.7.

In conclusion, the Commission found that there is ample factual and legal support for the City's determination that the proposed development is not consistent with the community character policies of Chapter 3 of the Coastal Act or with those of the certified Venice LUP.

Exhibit 3 – City's Determination

DEPARTMENT OF CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

HELEN LEUNG
KAREN MACK

DANA M. PERLMAN
YVETTE LOPEZ-LEDESMA
JENNA HORNSTOCK
VACANT
VACANT

CITY OF LOS ANGELES CALIFORNIA



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SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

VACANT
DEPUTY DIRECTOR

DIRECTOR'S DETERMINATION

May 19, 2021

Owner/Applicant

LA Riverstonegrey, LLC
950 Main Street, 4th Floor
Cleveland, OH 44113

Representative

Larry Mondragon
Craig Fry & Associates
1010 Arroyo Parkway
Suite #6
Pasadena, CA 91105

Case No. DIR-2019-5257-CDP-MEL

Related Case: ADM-2019-5259-VSO-ADU

CEQA: ENV-2019-5258-CE

Location: 628 East Santa Clara 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

Legal Description: Lot 11, Block O, Ocean Park
Villa Tract No. 2

Last Day to File an Appeal: June 4, 2021

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

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

Approve a Coastal Development Permit authorizing the demolition of two single-family dwellings and the construction of a new two-story, 3,254 square-foot, single-family dwelling with an attached two-car garage, roof deck and a 581 square-foot Accessory Dwelling Unit (ADU); three parking spaces are provided, 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 two Residential Units and construction of two new Residential Units in the Coastal Zone.

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

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.** The applicant shall construct a new single-family dwelling with an attached ADU, with a minimum area of 581 square feet. The proposed project shall replace the existing number of dwelling units.
4. **Height.** Projects having a flat roof shall not exceed a maximum height of 25 feet measured from the centerline of Santa Clara Avenue to the highest point of the roof excluding roof deck railings that do not exceed 42 inches and are of an open design. As shown in Exhibit A, the project proposes a flat roof with a maximum height of 24 feet and 8 inches. The roof deck railings as proposed are 42 inches tall and of an open design.
5. **Parking and Access.** The subject project shall provide three parking spaces onsite. Parking shall be accessed from the rear alley, Santa Clara Court.
6. **Roof Structures.** Chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the height limit by a maximum of five feet.
7. No deviations from the Venice Coastal Specific Plan have been requested or approved herein. All applicable provisions of the Specific Plan shall be complied with, as further noted in ADM-2019-5259-VSO-ADU or any subsequent Venice Sign Off (VSO).
8. **Single Permit Jurisdiction Area.** The project is located within the Single Permit Jurisdiction area of the California Coastal Zone. Prior to the issuance of any permits, the applicant shall provide a copy of the Coastal Commission's Notification that the City's coastal development permit is effective.
9. Outdoor lighting shall be designed and installed with shielding so that light does not overflow into adjacent residential properties.
10. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
11. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
12. Prior to the commencement of site excavation and construction activities a Construction Site Notice shall be posted on the site in a manner, which is readily visible to any interested party.
13. Prior to the issuance of any permits, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's

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

Administrative Conditions

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

Applicant shall do all of the following:

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

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

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

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

For purposes of this condition, the following definitions apply:

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

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

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

BACKGROUND

The subject site is a relatively flat, rectangular, residential lot with a width of 40 feet and depth of 130 feet, and a total lot area of approximately 5,200 square feet. The property fronts Santa Clara Avenue to the northwest and abuts Santa Clara Court, an alley. The subject lot is zoned RD1.5-1 with a General Plan land use designation of Low Medium II Residential. The property is located within the Los Angeles Coastal Transportation Corridor Specific Plan Area, Venice Coastal Zone Specific Plan (Oakwood Subarea), Calvo Exclusion Area, Urban Agriculture Incentive Zone, Liquefaction Zone, Methane Buffer Zone, and within 4.85 kilometers from the Santa Monica Fault.

The neighborhood and properties immediately surrounding the property are developed mainly with one and two-story residential structures comprised of single and multi-family dwellings in the RD1.5-1 zone. The lots maintain moderate landscaping and vegetation.

The applicant is requesting a Coastal Development Permit and Mello Act Compliance Review for the demolition of a one-story, 1,112 square-foot single family dwelling (front structure) and a one-story 576 square-foot single-family dwelling (rear structure) with an attached garage, and the construction of a new two-story 3,257 square-foot single-family dwelling with an attached two-car garage, roof deck and a 581 square-foot Accessory Dwelling Unit (ADU). A total of three onsite parking spaces are provided: two spaces in the attached garage and one uncovered tandem space behind the garage.

Santa Clara Avenue is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the actual right-of-way width is approximately 47 feet and a roadway width of 23 feet. The street is improved with a curb, gutter, and sidewalk.

Santa Clara Court is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the road is used as an alley with an actual right-of-way and roadway width of 15 feet.

Previous zoning related actions in the area include:

DIR-2019-499-CDP-MEL – On July 20, 2020, the Director of Planning approved a Coastal Development Permit authorizing the demolition of an existing 773 square-foot single-family dwelling; the construction of a new 6,528 square-foot two-story single-family dwelling with a basement level (having habitable area), an attached three-car garage, roof deck, and swimming pool, located in the Single Permit Jurisdiction of the California Coastal Zone, located at 717 East California Avenue & 670 East Santa Clara Avenue.

DIR-2019-2141-CDP-MEL – On January 21, 2020, the Director of Planning approved a Coastal Development Permit authorizing the construction of a two-story accessory structure comprised of an 827 square-foot Accessory Dwelling unit (ADU) above a storage area, bathroom and three-car garage; two parking spaces are maintained for the existing single-family dwelling and one space is provided for the new ADU, located in the Single Permit Jurisdiction of the California Coastal Zone, located at 628 East San Juan Avenue.

DIR-2019-1037-CDP-MEL – On September 16, 2019, the Director of Planning approved a Coastal Development Permit authorizing the demolition of an existing single-family dwelling and the construction of a new, two-story, 3,616 square-foot single-family dwelling with an attached two-car garage, a roof deck, and a swimming pool; a total of three parking spaces are provided onsite, located in the Single Permit Jurisdiction of the California Coastal Zone, located at 652 East Santa Clara Avenue.

DIR-2018-3787-CDP-MEL – On June 28, 2019, the Director of Planning approved a Coastal Development Permit authorizing the demolition of an existing single-family dwelling at the front portion of the lot, and construction of a three-story, 3,099 square-foot single-family dwelling providing three parking spaces, located in the Single Permit Jurisdiction of the California Coastal Zone, located at 609 East Milwood Avenue.

DIR-2016-3291-CDP-MEL – On June 28, 2019, the Director of Planning approved a Coastal Development Permit authorizing the demolition of an existing duplex and single-family dwelling, the subdivision of one 4,800 square-foot lot into two new lots that are 2,273 (Parcel A) and 2,527 (Parcel B) square-feet in lot area, and the construction of a two-story single-family dwelling with a roof deck on each newly created lot; a total of six parking spaces are provided, located in the Single Permit Jurisdiction of the California Coastal Zone, located at 635-637 East San Juan Avenue.

Public Hearing

In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, a public hearing was conducted remotely by a hearing officer (Ira Brown) on November 2, 2020 at 11:30 a.m. The applicant's representatives provided a description of the proposed project and related entitlement requests, including the following comments:

- The proposed project received an approval recommendation from the Venice Neighborhood Council.
- The project fits into the eclectic mass, scale and character of the neighborhood.
- The second story is stepped-back to reduce the massing from the street.
- The proposed project will maintain the existing number of residential units on site, consistent with the Venice Land Use Plan (LUP), and will increase the number of bedrooms from three bedrooms to 6 bedrooms.
- No affordable units were identified on-site; as such, the proposed project does not result in the loss of affordable units in the Coastal Zone.

Sue Kaplan (Citizens for Preserving Venice)

- The proposed project would result in an adverse cumulative impact to the multiple family character of the neighborhood.
- The purpose of an ADU is to add density to a project site not to meet or maintain a density requirement.
- An ADU is not required to be rented.
- Does not mitigate the loss of housing.

Robin Rudisill

- The proposed project would change the multi-family character of the neighborhood
- The certified Venice Land Use Plan designates the subject site for duplex and multifamily structures; as such, a single-family dwelling would not be permissible.
- The project would result in an adverse cumulative impact.
- The applicant should consider a larger ADU.

Ollie

- Only two people lived at the subject site for the past 20 years.
- The project site is a public nuisance for the neighborhood.

In response to comments, applicant team provided the following comments:

- A definition of multi-family dwelling and duplex are not provided in the LUP. The project meets the building code definition of a duplex.
- ADUs are lawful dwelling units, which can include separate addresses and utilities.
- The applicant has identified a tenant for the ADU.

Correspondence

Venice resident, Robin Rudisill, submitted an email on November 1, 2020 on behalf of Sue Kaplan and Citizens Preserving Venice writing in opposition to the proposed project. The email argued that the project would reduce density in the area because a JADU does not adequately replace the density from the demolition of a single-family dwelling. In addition, they indicate that the proposed project would change the multi-family character of the neighborhood, prejudice the ability of the City to prepare a Local Coastal Program, reduce affordable housing, and have a negative cumulative impact.

Housing Replacement (SB 330 Determination) Background

On October 9, 2019, the Governor signed into law the Housing Crisis Act of 2019 (SB 330). SB 330 creates new state laws regarding the production, preservation, and planning for housing, and establishes a statewide housing emergency until January 1, 2025. During the duration of the statewide housing emergency, SB 330, among other things, creates new housing replacement requirements for Housing Development Projects by prohibiting the approval of any proposed housing development project on a site that will require the demolition of existing residential dwelling units or occupied or vacant "Protected Units" unless the proposed housing development project replaces those units. The Department of Housing and Community Investment (HCIDLA) has determined, per the Housing Crisis Act of 2019 (SB 330) Replacement Unit Determination, dated September 3, 2020, that there are no (0) units subject to replacement pursuant to the requirements of the Housing Crisis Act of 2019 (SB 330). Furthermore, the proposed housing development project will replace the existing two (2) dwelling units with two (2) new dwelling units.

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 provisions are as follows:

Section 30244 Archaeological and Paleontological Resources.

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required. The project will demolish two existing single-story single-family dwellings and an attached garage and construct a two-story single-family dwelling with an attached garage, roof deck, and attached ADU. As such, little to no excavation and grading are proposed. The subject site is not located within an area with known Archaeological or Paleontological Resources. However, if such resources are discovered during excavation or grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

Section 30250 Location; existing developed area.

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. The proposed project is located in a residential neighborhood developed with similar single and multi-family dwellings. The lot fronts Santa Clara Avenue and abuts Santa Clara Court in the rear, which provides pedestrian and vehicular access to the site. The project will provide three onsite parking spaces for the single-family dwelling. The proposed new dwelling and ADU will maintain the existing connections and access to all public services. The project will replace an existing residential development. As such, the project will be located in an existing developed area contiguous with similar residential uses, in an area that is able to accommodate new development.

Section 30251 Scenic and Visual Qualities.

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting. The subject site and surrounding area are relatively flat with no views to and along the ocean; no natural land forms will be altered as part of the project. The project will demolish two

existing single-story single-family dwellings and an attached garage and construct a two-story single-family dwelling with an attached garage, roof deck, and attached ADU and is located within a residential neighborhood developed primarily with one and two-story structures. There are 40, RD1.5-1 zoned lots on Santa Clara Avenue between 6th Avenue to the west and 7th Avenue to the east, excluding the subject site. These lots are developed with single- and multi-family dwellings, of which approximately 21 are one-story in height and 19 are two-stories in height. In the proposed project, the second story is stepped back away from the property lines to minimize the massing from the street. As such, the proposed project is consistent with the scale and massing of the neighborhood.

The project's consistency with development standards in the Certified Venice Land Use Plan (LUP) is important in assessing the project's compatibility with the character of the surrounding area. The Certified LUP states that "[t]he development standards also define for each land use designation a density of housing units and lot coverage to maintain the scale and character of existing residential neighborhoods and minimize the impacts of building bulk and mass" (LUP, p.II-2). The majority of structures in the area were constructed prior to the certification of the LUP in 2001 and adoption of the Venice Specific Plan in 1999 and 2004. The structures constructed after the certification of the LUP were reviewed and approved, as complying with the density, buffer/setback, yard, and height standards in the LUP as well as the applicable policies of the Coastal Act. Following the adoption of the LUP, new legislation has been adopted by the State and the City to allow the development of Accessory Dwelling Units (ADU). LAMC Section 12.03 defines ADUs as: "An attached or detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. It shall include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same lot as the single-family or multifamily dwelling is or will be situated. ADUs include efficiency units as defined in Section 17958.1 of the Health and Safety Code, manufactured homes as defined in Section 18007 of the Health and Safety Code, and Movable Tiny Houses."

The project site has a Land Use Designation of Low Medium II Residential and is subject to the development standards outlined in Policy I.A.7, which recommends duplex and multi-family uses. Although the new structure is classified as a duplex, it is comprised of two dwelling units within one residential structure, consistent with a typical multi-family structure. The proposed development complies with the density, buffer/setback, yard, and height standards outlined in Policy I.A.7 of the LUP, further discussed in Finding No. 2. The proposed massing and scale of the proposed development comply with the policies of the LUP. As proposed, the new residential structure comprised of two dwelling units, is visually compatible with the character of the area and will enhance the existing neighborhood.

Section 30252 Maintenance and Enhancement of Public Access.

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development. The project proposes the demolition of two existing single-story single-family dwellings and an attached garage and the construction of a two-story single-family dwelling with an attached

garage, roof deck, and attached ADU. The subject site is located approximately 0.63 miles from the Pacific Ocean shoreline. The project complies with the minimum parking requirements of three onsite parking spaces for the new single-family dwelling. The provisions of ADU State Law and the City's ADU Ordinance (LAMC Section 12.22-A.33(c)(12)) require one parking space for an ADU unless 1) located within ½ mile walking distance from a bus or rail stop, 2) one block from a designated car share pickup or drop off location, 3) within an applicable historic district, or 4) part of a proposed or existing residence. The subject site is located 1480 feet from public transit, as such, no parking is required for the ADU. The project provides adequate parking for the existing and proposed dwelling units. No permanent structures would be placed within the public right-of-way and public access to the coast would not be impacted.

Section 30253 Minimization of Adverse Impacts.

New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses. The property is located within 4.85 kilometers from the Santa Monica Fault and within a Liquefaction Zone. As such, the project is subject to compliance with Zoning, Building, and Fire Safety Code requirements that will minimize risks to life and property in geologic and methane hazard areas. The property is located within Zone X, outside the flood zone.

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

The Coastal Storm Modeling System (CoSMoS) was utilized to analyze the project's vulnerability to flood hazards, considering a scenario of a minimum 6.6-foot sea level rise and a 100-year storm scenario. Based on this scenario, the proposed development could potentially be affected by flooding as a result of SLR, however, the potential for such flooding in severe storm events is likely to increase towards the end of the project life (based on a typical development life of 75 years). The proposed project does not include

any basement areas. Furthermore, any repair, demolition, and/or new construction as a result of any flooding would be subject to additional review. As conditioned, the proposed development is consistent with Section 30253 of the Coastal Act.

The proposed development would have no adverse impacts on public access, recreation, public views or the marine environment, as the property is located within a developed residential area and located more than 0.63 miles from the Venice Beach shoreline. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filling or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed dwelling will not block any designated public access views. As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

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

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

As discussed, the project consists of the demolition of two existing single-story single-family dwellings and an attached garage and the construction of a two-story single-family dwelling with an attached garage, roof deck, and attached ADU. The subject site is zoned RD1.5-1 with a land use designation of Low Medium II Residential.

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

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

Policy I.A.7. outlines density and development standards for areas designated for Multi-Family Residential – Low Medium II Density in the Oakwood Subarea: restricting density to 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 and limiting height to 25 feet for buildings with flat roofs. As previously discussed, project consists of the demolition of two existing single-story single-family dwellings and an attached garage and the construction of a two-story single-family dwelling with an attached garage, roof deck, and attached ADU. Specifically, the Land Use Designation of Low Medium II Residential recommends duplex and multi-family uses. The project maintains the existing number of units on site (two dwelling units) and proposes a maximum height of 25 feet with a flat roof. Thus the project is consistent with Policy I.A.7 and the character of the neighborhood.

Policy II.A.3. outlines the parking requirements for residential projects: single-family dwelling projects on lots 35 feet or more in width (if adjacent to an alley) are required to provide three parking spaces. The subject lot is 40 feet wide and requires three parking spaces. The project will provide a total of three parking spaces, three for the single-family

dwelling, and zero for the ADU. The provisions of ADU State Law and the City's ADU Ordinance (LAMC Section 12.22-A.33(c)(12)) require one parking space for an ADU unless 1) located within ½ mile walking distance from a bus or rail stop, 2) one block from a designated car share pickup or drop off location, 3) within an applicable historic district, or 4) part of a proposed or existing residence. The new Accessory Dwelling Unit complies with the State's standard, (ADUs are limited to a maximum size of 1,200 square feet) and provides an opportunity for infill development that would not impact coastal resources. The proposed development is located within 1,497 feet from public transit as such, no additional parking is required for the ADU. In addition, vehicular access will continue to be provided from the rear alley, Santa Clara Court.

Preservation of Venice as a Special Coastal Community

Policy I.E.1. General. *Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.*

Policy I.E.2. Scale. *New Development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer, and setback) shall be encouraged. All new development and renovations shall respect the scale, massing, and landscape of existing residential neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.*

Policy I.E.3. Architecture. *Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.*

The above-referenced policies are applicable to new Development in the Venice Coastal Zone. Policies I.E.1 and I.E.3 encourage a diversity in architectural style and building materials. The proposed structure provides a contemporary design with flat rooflines, cedar wood siding, plaster and a prominent front trellis. Similar to the Section 30251 of the Coastal Act, Policy I.E.2 addresses the importance of visual compatibility with the scale and character of existing development, specifying that scale refers to bulk, height, buffer, and setback. As discussed, the proposed two-story development is consistent with the massing and height of the two-story single-family dwellings on Santa Clara Avenue. The Oakwood neighborhood consists of homes with varying ages, styles, and sizes. There are 40, RD1.5-1 zoned lots on Santa Clara Avenue between 6th Avenue to the west and 7th Avenue to the east, excluding the subject site. These lots are developed with single- and multi-family dwellings, of which approximately 21 are one-story in height and 19 are two-stories in height. In the proposed project, the second story is stepped back away from the property lines to minimize the massing from the street. As such, the proposed project is consistent with the scale and massing of the neighborhood. The proposed project complies with the development standards outlined in Policy I.A.1 to I.A.3 of the LUP. No roof access structure is proposed and, as conditioned, the roof deck railings do not exceed

42” and are of an open design. Therefore, the proposed project complies with Policy I.E.1, I.E.2, and I.E.3 of the LUP.

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

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

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

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

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

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

- In February 2020, the Commission found Substantial Issue with an appeal of a Coastal Development Permit, and at the de novo hearing, the Commission approved with conditions the demolition of a two-story, 1,856 square foot duplex and the construction of a 3-story, 2,799 square foot single-family dwelling with a 2-story, 815 square foot accessory dwelling unit and 3 onsite parking spaces, located at 21 29th Avenue (A-5-VEN-19-0022/5-19-0949).

- In November 2019, the Commission approved with conditions a Coastal Development Permit on appeal for the after-the-fact conversion of a one-story, 1,019 square foot duplex to a single-family residence and construction of a 315 square foot accessory dwelling unit above existing 315 square foot garage, located at 812-814 Amoroso Place (A-5-VEN-19-0018).
- In March 2019, the Commission approved with conditions a Coastal Development Permit on appeal for an after-the-fact conversion of two existing guest rooms to two dwelling units, within a 3-unit apartment building in the Dual Permit Jurisdiction, located at 10 East Anchorage Street (A-5-VEN-19-0006).
- In August 2019, the Commission approved a Coastal Development Permit authorizing the demolition of a two-story single-family dwelling and the construction of a new three-story 3,631 square-foot single-family dwelling with an attached two-car garage and a roof deck, in the Dual Permit Jurisdiction, located at 237 Linnie Canal (5-19-0233).
- In March 2019, the Commission approved a Coastal Development Permit authorizing the demolition of a two-story, multi-unit residential structure and the construction of a new three-story, 4,584 square foot mixed-use structure with a retail space, accessory dwelling unit, single-family residence, and an attached five-car garage with a roof deck, in the Dual Permit Jurisdiction, located at 3011 Ocean Front Walk (5-18-0212 & A-5-VEN-18-0017).
- In October 2018, the Commission found No Substantial Issue with an appeal of a Coastal Development Permit for the demolition of a one-story, 855 square-foot single-family residence and the construction of a three-story over basement, 3,753 square-foot mixed-use development, consisting of 759 square feet of ground floor retail use, a 2,092 square-foot residential unit on the second floor, a roof deck, and an attached four-car garage, located at 706 South Hampton Drive (Application No. A-5-VEN-18-0054).
- In August 2018, the Commission approved a Coastal Development Permit for the demolition of a one-story single-family dwelling and the construction of a two-story, 2,787 square-foot single-family dwelling with a roof deck and attached garage, located at 2412 Clement Avenue (Application No. A-5-VEN-17-0072).
- In August 2018, the Commission found No Substantial Issue with an appeal of a Coastal Development Permit for the demolition of a 939 square-foot one-story single-family home and the construction of a 3,027 square-foot two-story, single-family home with an attached two-car garage and roof deck, located at 2416 Frey Avenue (Appeal No. A-5-VEN-18-0037).
- In August 2018, the Commission found No Substantial Issue with an appeal of a Coastal Development Permit for the demolition of a 1,099 square-foot one-story single-family dwelling and the construction of a 2,811 square-foot two-story single-family dwelling with an attached two-car garage and a roof deck, located at 2433 Wilson Avenue (Appeal No. A-5-VEN-18-0038).
- In June 2018, the Commission approved a Coastal Development Permit for the demolition of a one-story single-family dwelling on two lots and the construction of a three-story, 1,560 square-foot single-family dwelling and a three-story, 2,060 square-foot single-family dwelling, both with a roof deck and attached garage, located at 676 and 678 Marr Street (Application No. A-5-VEN-0042).

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

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

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

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

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

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

The subject property is located approximately 0.63 miles from the Venice Beach shoreline; the proposed development is limited to the subject property. The project will provide a total of three parking spaces, three for the single-family dwelling, and zero for the ADU. The provisions of ADU State Law and the City's ADU Ordinance (LAMC Section 12.22-A.33(c)(12)) require one parking space for an ADU unless 1) located within ½ mile walking distance from a bus or rail stop, 2) one block from a designated car share pickup or drop off location, 3) within an applicable historic district, or 4) part of a proposed or existing residence. The new Accessory Dwelling Unit complies with the State's standard, (ADUs are limited to a maximum size of 1,200 square feet) and provides an opportunity for infill development that would not impact coastal resources. The proposed development is located within 1,497 feet from public transit as such, no additional parking is required for the ADU. In addition, vehicular access will continue to be provided from the rear alley, Santa Clara Court. The sidewalk along Santa Clara Avenue will remain unaffected by the project. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

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

A Categorical Exemption, ENV-2019-5258-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act and the City CEQA Guidelines. The project proposes the demolition of a one-story, 1,112 square-foot single family dwelling (front structure) and a one-story 576 square-foot single-family dwelling (rear structure) with an attached garage, and the construction of a new two-story 3,257 square-foot single-family dwelling with an attached two-car garage, roof deck and a 581 square-foot Accessory Dwelling Unit (ADU); three parking spaces are provided. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines, Section 15301 (Class 1) and 15303 (Class 3).

The Class 1 Categorical Exemption includes demolition and removal of individual small structures: (1) One single-family residence. In urbanized areas, up to three single-family residences may be demolished under this exemption; (2) A duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished; (3) A store, motel, office, restaurant, or similar small commercial structure if designed for an occupant load of 30 persons or less. In urbanized areas, the exemption also applies to the demolition of up to three such commercial buildings on sites zoned for such use; (4) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences. The project includes the demolition of two single-family dwellings and an attached garage and qualifies for this exemption.

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

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

- (a) Location. The project is not located in a sensitive environment. Although the project is located within the Coastal Zone, the residential neighborhood is not identified as an environmental resource. The proposed project is consistent with the scale and uses proximate to the area. The subject site is not located in a fault or flood zone, nor is it within a landslide area. Although the project is located within a liquefaction area, the project is subject to compliance with the requirements of the Building and Zoning Code that outline standards for residential construction.
- (b) Cumulative Impact. The project is consistent with the type of development permitted for the area zoned RD1.5-1 and designated Low Medium II Residential use. The project will demolish two existing single-family dwellings with an attached garage and construct a single-family dwelling with an attached garage, roof deck, and an attached ADU and will not exceed thresholds identified for impacts to the area (i.e., traffic, noise, etc.). The project will not result in significant cumulative impacts.
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. The project proposes a two-story single-family dwelling with an attached garage, roof deck, and an attached ADU in an area zoned and designated for such development. The surrounding area is developed with similar single- and multi-family residential uses. The proposed density is consistent with the density permitted by the Venice Specific Plan (RD1.5 density). The proposed height and massing are not unusual for the project vicinity. The proposed project consists of work typical to a residential neighborhood, no unusual circumstances are present or foreseeable. The proposed project consists of work typically to a residential neighborhood, no unusual circumstances are present or foreseeable.

- (d) Scenic Highways. The project site is not located on or near a designated state scenic highway.
- (e) Hazardous Waste Sites. The project site is not identified as a hazardous waste site or is on any list compiled pursuant to Section 65962.5 of the Government Code.
- (f) Historical Resources. The subject site and existing structures have not been identified as a historic resource or within a historic district (SurveyLA, 2015). The project is not listed on the National or California Register of Historic Places, or identified as a Historic Cultural Monument (HCM).

Mello Act Compliance Review

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

7. Demolitions and Conversions (Part 4.0).

The project includes the demolition of two existing single-family dwellings located on a 5,201.9 square-foot lot in the Venice Coastal Zone. A Determination issued by the Los Angeles Housing and Community Investment Department (HCIDLA) dated September 3, 2020 states that the property currently consists of two dwelling units (628 Santa Clara Avenue & 628 ½ Santa Clara Avenue). The current owner acquired the property on April 8, 2019 and applied with the Department of City Planning on September 5, 2019. HCIDLA collected data from September 2016 through September 2019, utilizing data provided by the current owners and the Department of Water and Power. For 628 Santa Clara Avenue, the owner provided property tax bills from 2016-2018, which were all addressed to the previous owner at 628 Santa Clara Avenue, and showed that the homeowner's exemption fee was paid for 2016, 2017, and 2018. For 628 ½ Santa Clara Avenue, information provided directly from the Department of Water and Power indicates that the unit was likely vacant throughout the 36 month lookback period. The data collected from September 2016 through September 2019 show that no affordable units exists on the property.

Therefore, no Affordable Existing Residential Units are proposed for demolition or conversion; and the applicant is not required to provide any Affordable Replacement Units.

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

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

ADDITIONAL MANDATORY FINDING

- 9. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have

been reviewed and it has been determined that this project is located in Zone X, outside the flood zone.

TIME LIMIT – OBSERVANCE OF CONDITIONS

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

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

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

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

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

TRANSFERABILITY

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

APPEAL PERIOD - EFFECTIVE DATE

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

Public offices are located at:

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

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

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

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

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

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

VINCENT P. BERTONI, AICP
Director of Planning

Approved by:

Reviewed by:


Faisal Roble, Principal City Planner


Juliet Oh, Senior City Planner

Reviewed by:

Prepared by:


Elizabeth Gallardo, City Planner


Ira Brown, City Planning Associate
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FR:JO:EG:IB:BB



Eric Garcetti, Mayor
Rushmore D. Cervantes, General Manager

DATE: September 3, 2020

TO: LA RIVERSTONEGREY, LLC, an Ohio limited liability company, Owner

FROM: Marites Cunanan, Senior Management Analyst II *MCunanan*
Los Angeles Housing and Community Investment Department

SUBJECT: **Housing Crisis Act of 2019 (SB 330)**
Replacement Unit Determination
RE: 628-628.5 E. Santa Clara Avenue, Los Angeles, CA 90291

Based on the Application for a Replacement Unit Determination (RUD) submitted by LA RIVERSTONEGREY, LLC, an Ohio limited liability company (Owner) for the above referenced property located at 628-628.5 E. Santa Clara Avenue (APN # 4239-029-010) (Property), the Los Angeles Housing and Community Investment Department (HCIDLA) has determined that there are no units subject to replacement pursuant to the requirements of the Housing Crisis Act of 2019 (SB 330).

PROJECT SITE REQUIREMENTS:

SB 330 prohibits the approval of any proposed housing development project on a site that will require the demolition of existing residential dwelling units or occupied or vacant "Protected Units" unless the proposed housing development project replaces those units as specified below. The replacement requirements below are applicable only to those proposed housing development projects that submit a complete application pursuant to California Government Code Section 65943 to the Department of City Planning on or after January 1, 2020.

Replacement of Existing Residential Dwelling Units.

The proposed housing development project shall provide at least as many residential dwelling units as the greatest number of residential dwelling units that existed on the project site within the past 5 years.

Replacement of Existing or Demolished Protected Units.

The proposed housing development project must also replace all existing or demolished "Protected Units." Protected Units are those residential dwelling units that are or were within the 5 years prior to the owner's application for a Replacement Unit Determination: (1) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income, (2) subject to any form of rent or price control through a public entity's valid exercise of its police power within the 5 past years, (3) **occupied by lower or very low income households (an affordable Protected Unit)**, or (4) that were withdrawn from rent or lease per the Ellis Act, within the past 10 years.

Whether a unit qualifies as an affordable Protected Unit, is primarily measured by the income level of the occupants (i.e. W-2 forms, tax return, pay stubs etc.). In the absence of occupant income documentation, affordability will default to the percentage of extremely low, very low, and low income renters in the jurisdiction as shown in the latest HUD Comprehensive Housing Affordability Strategy (CHAS) database, which is presently at 32% extremely low income, 19% very low income and 19% low income for Transit Oriented communities (TOC) projects and 51% very low income and 19% low income for Density Bonus projects. The remaining 30% of the units are presumed above-low income and if subject to the Rent Stabilization Ordinance ("RSO"), must be replaced in accordance with the RSO. All replacement calculations resulting in fractional units shall be rounded up to the next whole number.

Relocation, Right of Return, Right to Remain for Occupants of Protected Units.

SB 330 also provides the right of first refusal for comparable units (i.e. same bedroom type) in the owner's proposed new housing development to occupants of Protected Units. Therefore, for occupied units, the replacement units must be of the same bedroom type of the units demolished. The comparable replacement units must be provided at a rent or sales price affordable to the same or lower income category. Occupants of Protected Units also are entitled to receive relocation to state or local law, whichever provides greater assistance and the right to remain in their unit until 6 months before the start of construction.

THE PROPOSED HOUSING DEVELOPMENT PROJECT:

Per the statement received by HCIDLA on May 12, 2020, the Owner plans to construct a 3,452 sq. ft. single family dwelling and an attached 197 sq. ft. accessory dwelling unit on the Property.

STATUS OF PROJECT SITE/PROPERTY:

Owner submitted an Application for a RUD for the Property 628-628.5 E. Santa Clara Avenue. In order to comply with the required 5 year look back period, HCIDLA collected and reviewed data from May 2015 – May 2020.

Review of Documents:

Pursuant to the Owner's Grant Deed, the Property was acquired on April 8, 2019.

Department of City Planning (ZIMAS), County Assessor Parcel Information (LUPAMS), DataTree database, Billing Information Management System (BIMS) database, and the Code, Compliance, and Rent Information System (CRIS) database indicate a use code of "0200-Residential-Double, Duplex, or Two Units-4 Stories or Less". Google Earth, Google Street View, and an internet search on the Property all show residential units. Per the Rent Stabilization Ordinance (RSO) Unit, the Property has two dwelling units.

The Los Angeles Department of Building and Safety database indicates that the Owner has applied for a new Building Permit (19010-30000-05991) and two new Demolition Permits (19010-10000-05747 and 19019-10000-05748), permits not issued.

REPLACEMENT UNIT DETERMINATION:

HCIDLA has determined that since May 12, 2015, 628 E. Santa Clara Avenue has been owner occupied from May 2015 to April 2019 and vacant from April 2019 to May 2020. 628 ½ E. Santa Clara has been vacant from May 2015 to May 2020. The proposed housing development does not require the demolition of any prohibited types of housing, therefore no SB330 replacement affordable units are required.

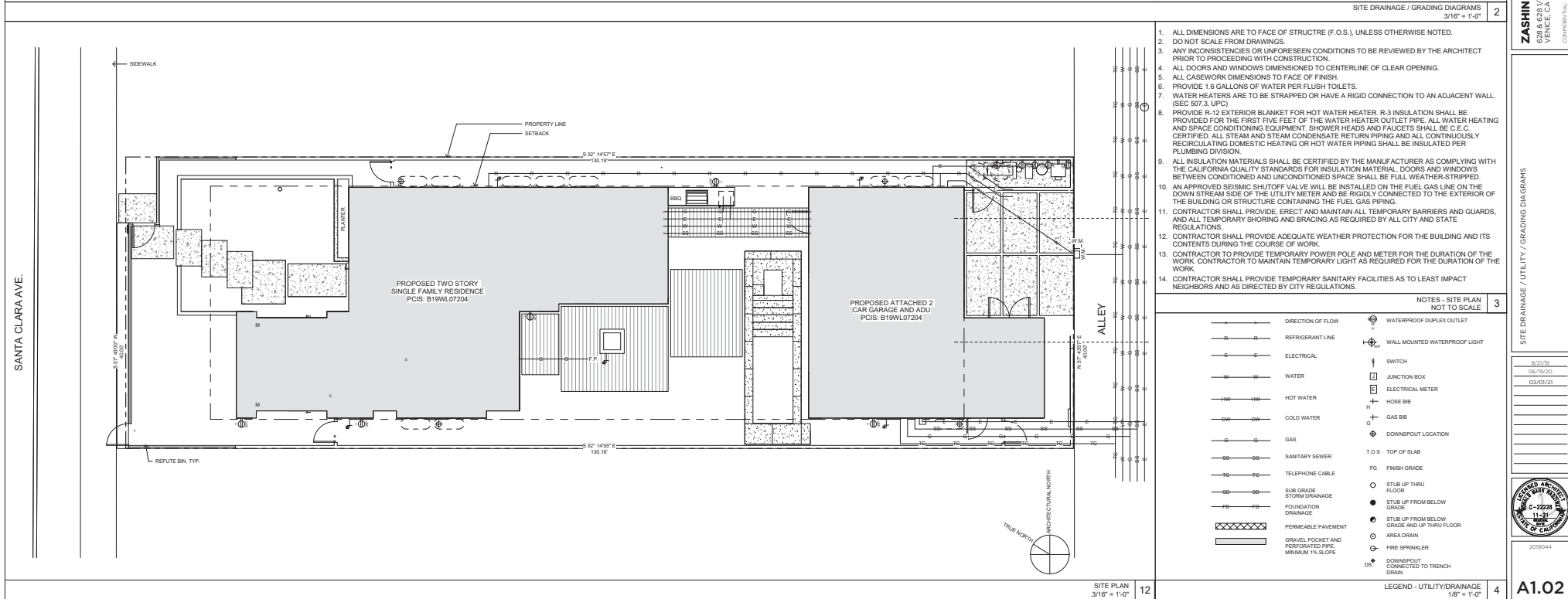
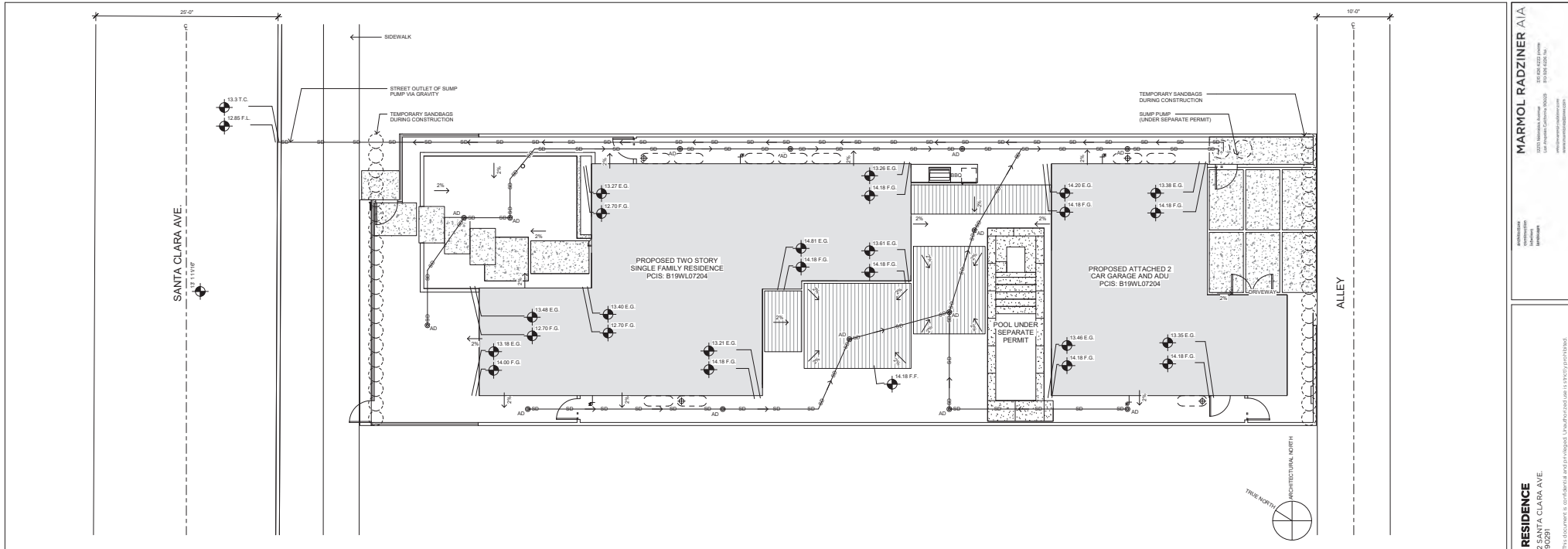
If you have any questions about this RUD, please contact Louie Miller at (213) 808-8847, or louie.miller@lacity.org.

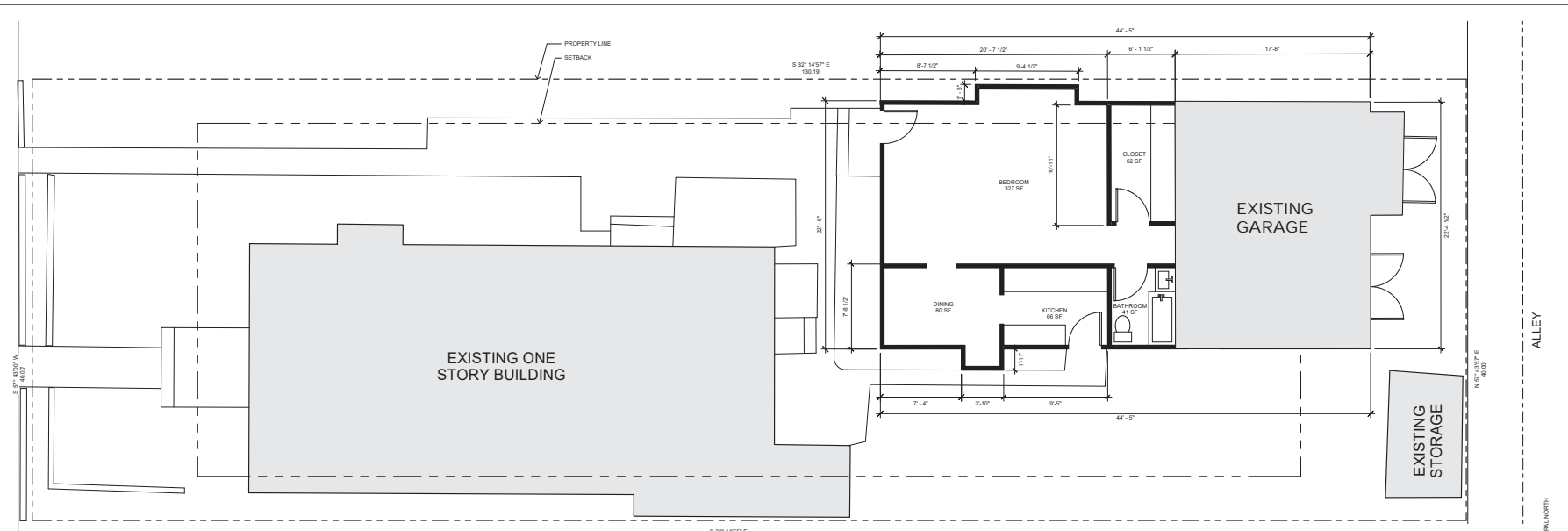
NOTE: This determination is provisional and is subject to verification by HCIDLA's Rent Division.

cc: Los Angeles Housing and Community Investment Department File
LA RIVERSTONEGREY, LLC, an Ohio limited liability company, Owner
Planning.PARP@lacity.org, Department of City Planning

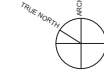
MAC:lm

<div>12020 Wilshire Avenue Suite 400 Los Angeles, California 90050 310.551.8225 Home 310.551.8225 Fax www.marmol-radziner.com</div> <div>MARMOL RADZINER A/A</div>	<div>architects interiors landscape</div> <div>ZASHIN RESIDENCE 505 N. KLAU AVE. VENICE, CA 90291</div>	<div>TITLE SHEET</div> <div>8/20/09 06/09/20 03/01/21</div> <div>2010044</div> <div>A0.01</div>
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EXISTING REAR UNIT
TOTAL AREA: 576 SF



SITE PLAN - AS BUILT
1/4" = 1'-0"

ZASHIN RESIDENCE
628 SANTA CLARA AVE.
VENICE, CA 90291

SITE PLAN AS BUILT

8/21/19
06/19/20
03/01/21

111

111

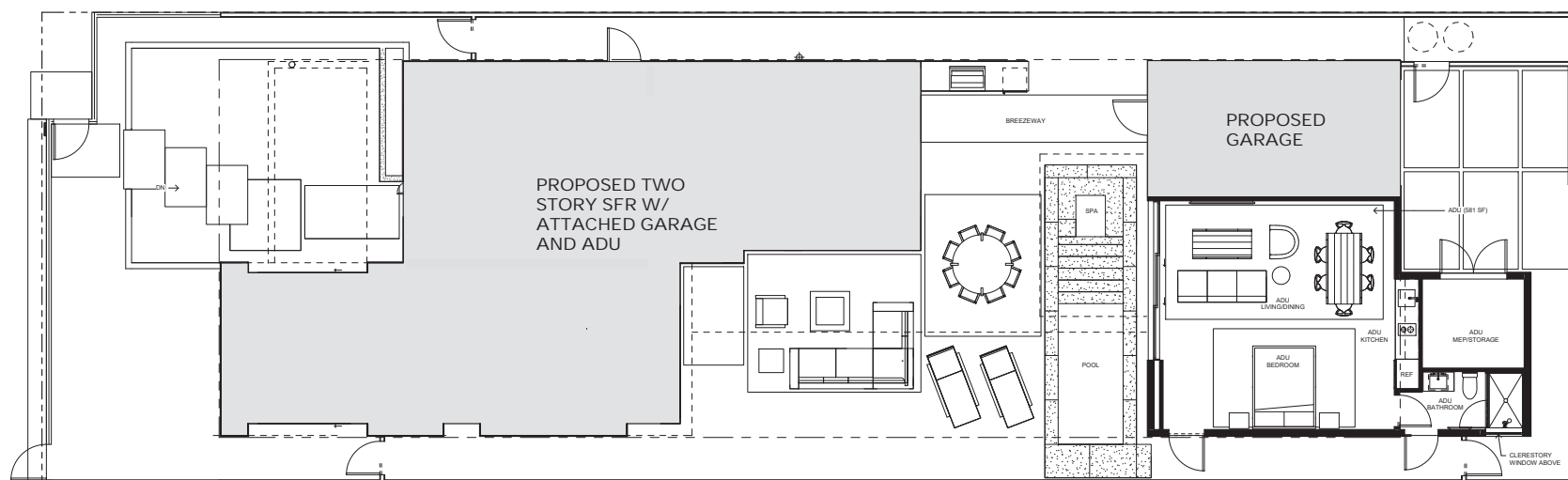
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A1.10

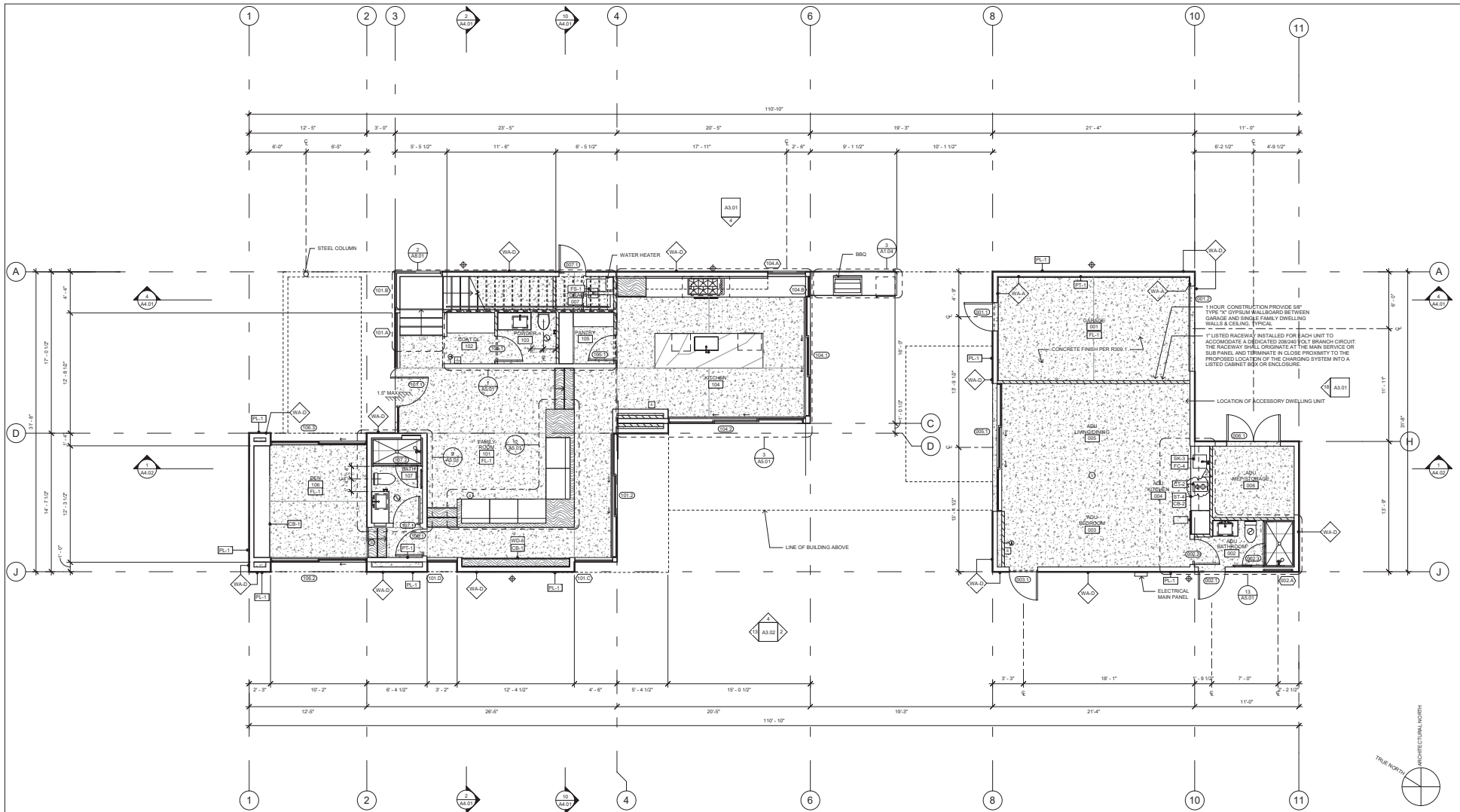
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PROPOSED ADU
TOTAL AREA: 581 SF

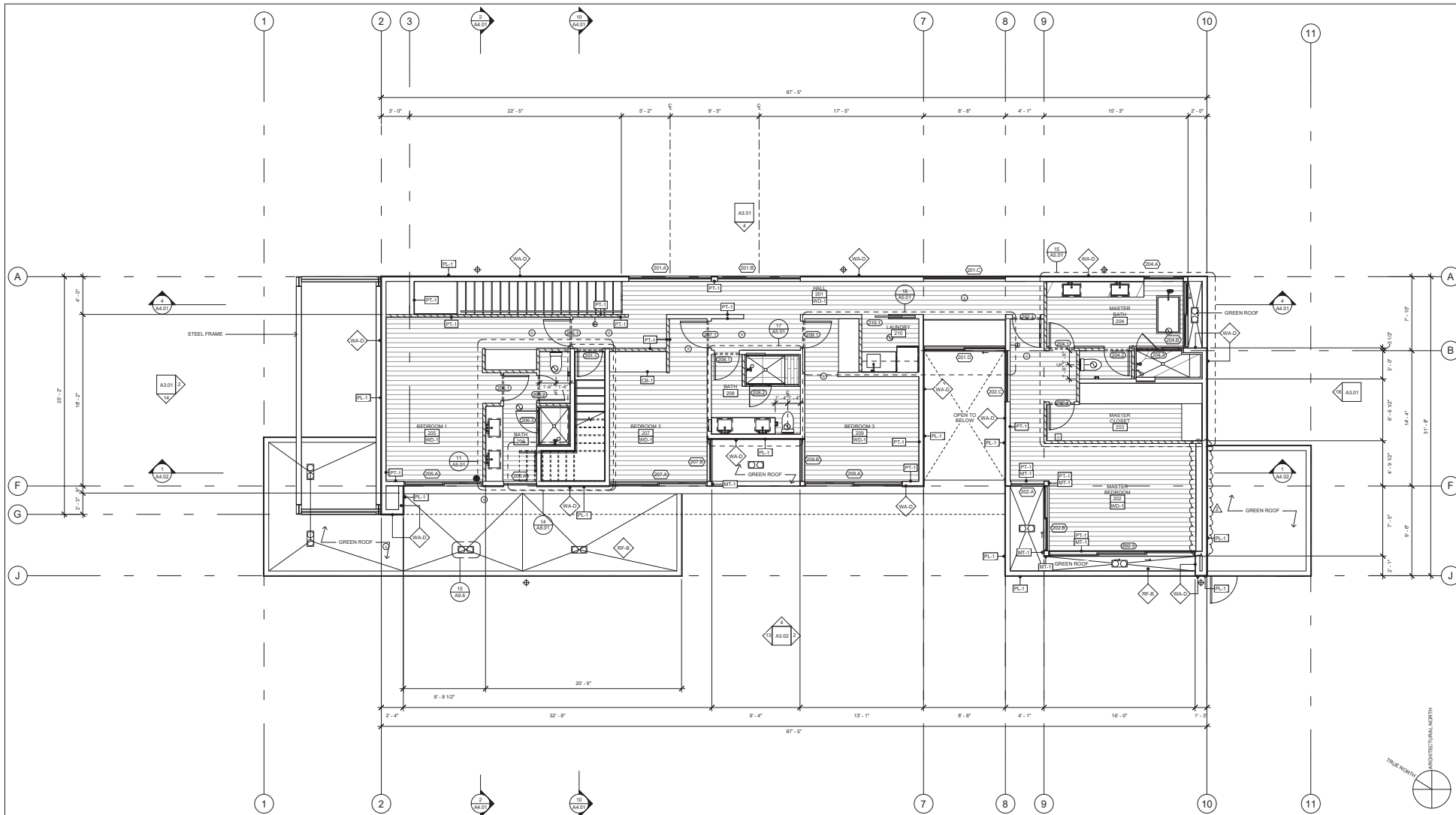


SITE PLAN - PROPOSED SFR & ADU 1/4" = 1'-0"	8
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FIRST FLOOR PLAN
1/4" = 1'-0"

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SECOND LEVEL FLOOR PLAN
1/4" = 1'-0"

SECOND LEVEL FLOOR PLAN

ZASHIN RESIDENCE
628 & 628 1/2 SANTA CLARA AVE.
VENICE, CA 90291

ARCHITECT
MARMOL RADZINER AIA

10251 Wilshire Avenue
Los Angeles, California 90024
Tel: 310 422 2222
Fax: 310 422 2222

CONFIDENTIAL: This document is confidential and privileged. Unlawful use is strictly prohibited.

<p>NOT USED NOT TO SCALE</p> <p>20</p>	<p>NOT USED NOT TO SCALE</p> <p>16</p>	<p>NOT USED NOT TO SCALE</p> <p>12</p>	<p>NOTES - FLOOR PLAN NOT TO SCALE</p> <p>8</p>	<p>WALL TYPES NOT TO SCALE</p> <p>4</p>
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NOTE:
PAINT IN BATHROOMS TO BE PT-2,
ALL OTHER SPACES TO BE PT-1
UNLESS NOTED OTHERWISE

NOTE:
ALL INTERIOR WALL ASSEMBLIES TO BE W-A-A UNLESS NOTED OTHERWISE

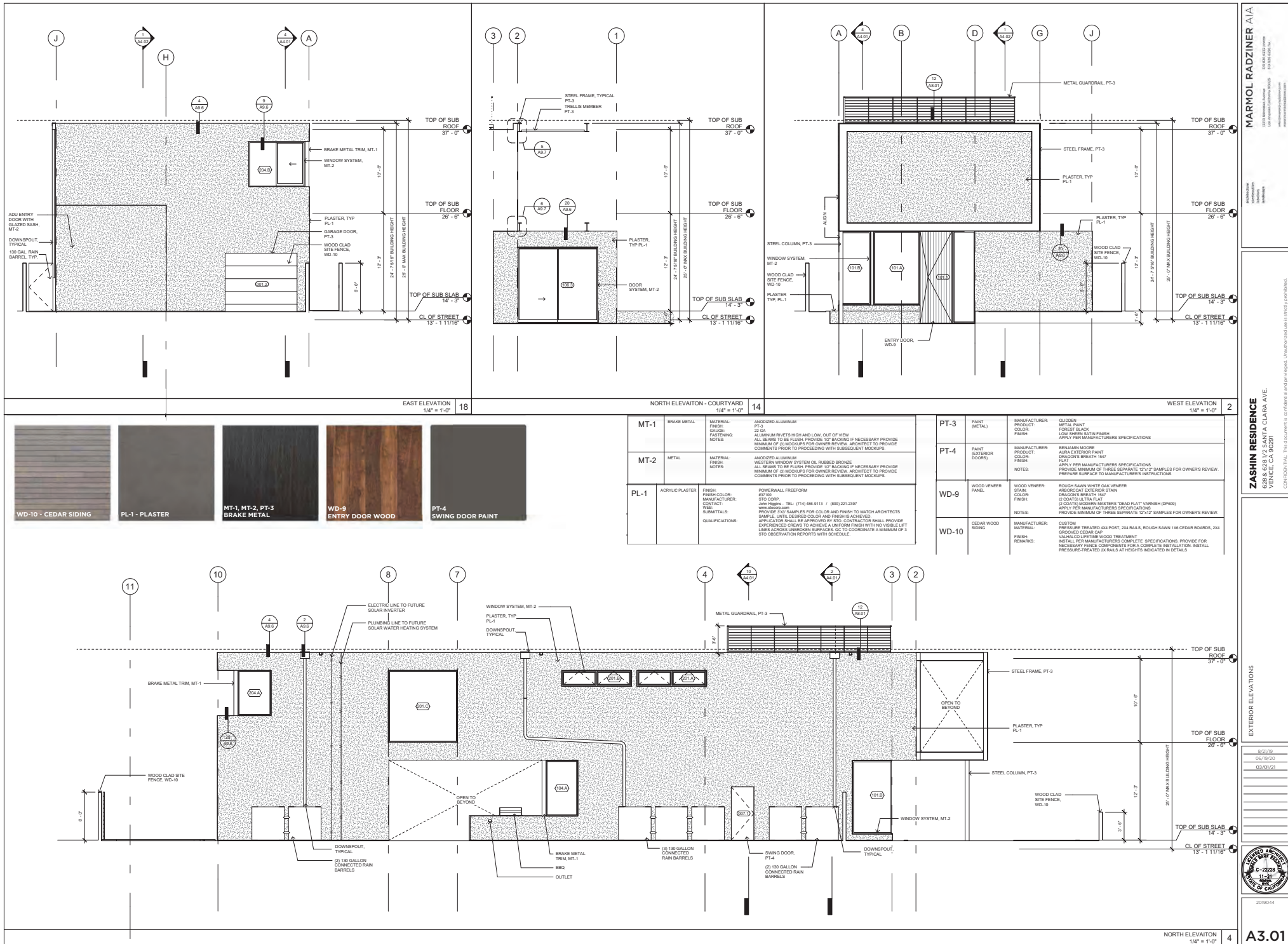
1. ALL DIMENSIONS ARE TO FACE OF STRUCTURE (F.O.S.), UNLESS OTHERWISE NOTED.
2. DO NOT SCALE FROM DRAWINGS.
3. ANY INCONSISTENCIES OR UNFORESEEN CONDITIONS TO BE REVIEWED BY THE ARCHITECT PRIOR TO PROCEEDING WITH CONSTRUCTION.
4. ALL DOORS AND WINDOWS DIMENSIONED TO CENTERLINE OF CLEAR OPENING.
5. ALL CASEWORK DIMENSIONS TO FACE OF FINISH.
6. CONTRACTOR SHALL PROVIDE, ERECT AND MAINTAIN ALL TEMPORARY BARRIERS AND GUARDS, AND ALL TEMPORARY SHORINGS AND BRACING AS REQUIRED BY ALL CITY AND STATE REGULATIONS.
7. CONTRACTOR SHALL PROVIDE ADEQUATE WEATHER PROTECTION FOR THE BUILDING AND ITS CONTENTS DURING THE COURSE OF WORK.
8. CONTRACTOR SHALL PROVIDE TEMPORARY SANITARY FACILITIES AS TO LEAST IMPACT NEIGHBORS AND AS DIRECTED BY CITY REGULATIONS.
9. FANS SHALL BE ENERGY STAR COMPLIANT AND BE DUCTED TO TERMINATE TO THE OUTSIDE OF THE BUILDING.
10. FANS, NOT FUNCTIONING AS A COMPONENT OF A WHOLE HOUSE VENTILATION SYSTEM, MUST BE CONTROLLED BY A HUMIDITY CONTROL.

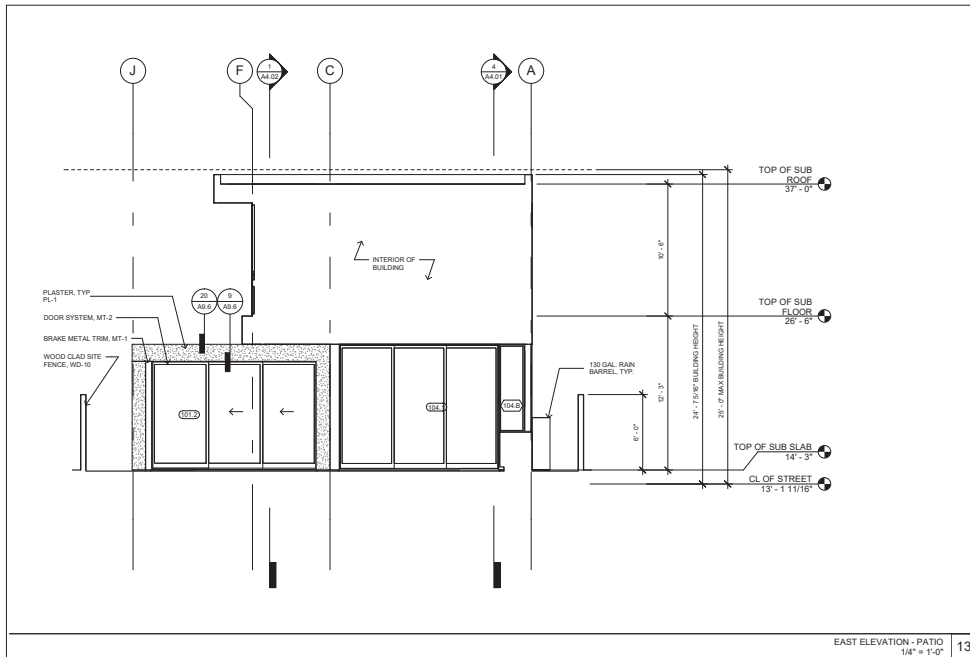
<p>EXISTING STRUCTURE</p> <p>2X4 WOOD FRAMING</p> <p>2X6 WOOD FRAMING</p> <p>MASONRY</p> <p>CONCRETE</p> <p>KEYPAD</p> <p>SMOKE, CARBON MONOXIDE DETECTOR</p> <p>MECHANICAL EXHAUST</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p>
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APPROVED
DATE
C-2228
11-21
STATE OF CALIFORNIA

20190044

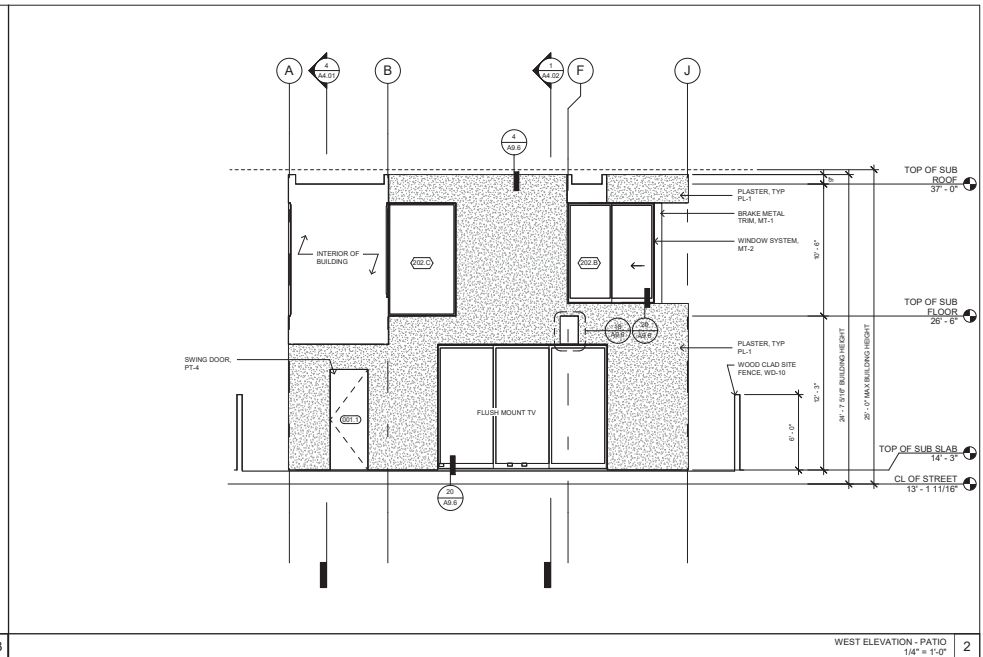
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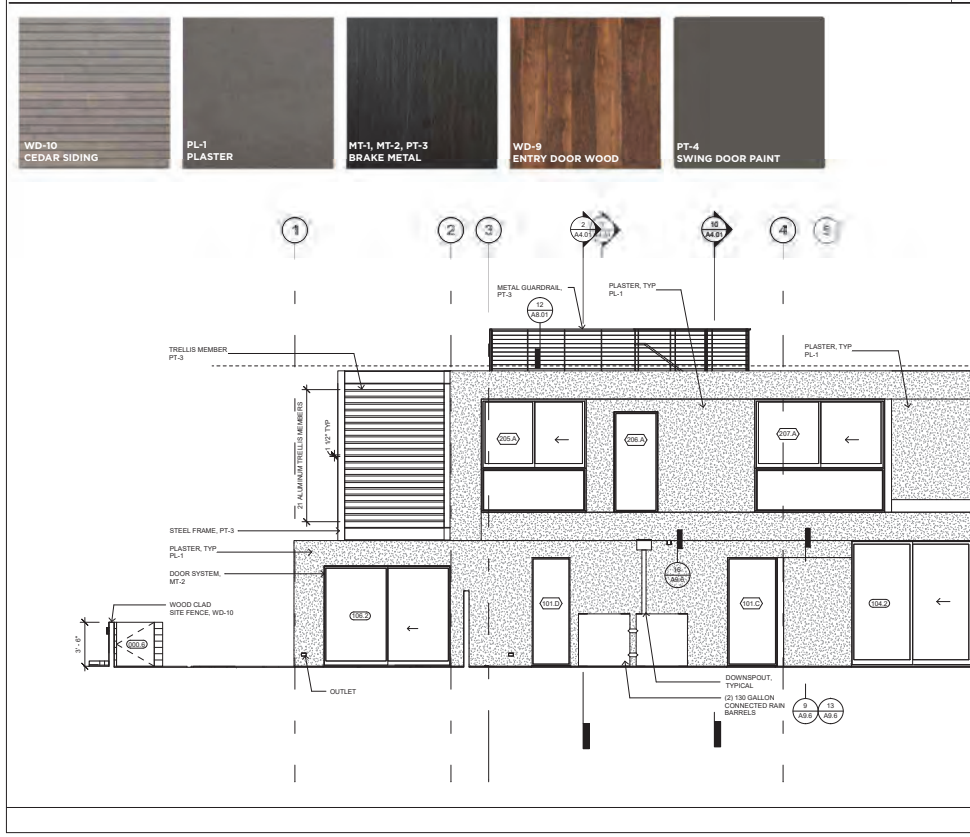
EAST ELEVATION - PATIO
1/4" = 1'-0"

13



WEST ELEVATION - PATIO
1/4" = 1'-0"

2

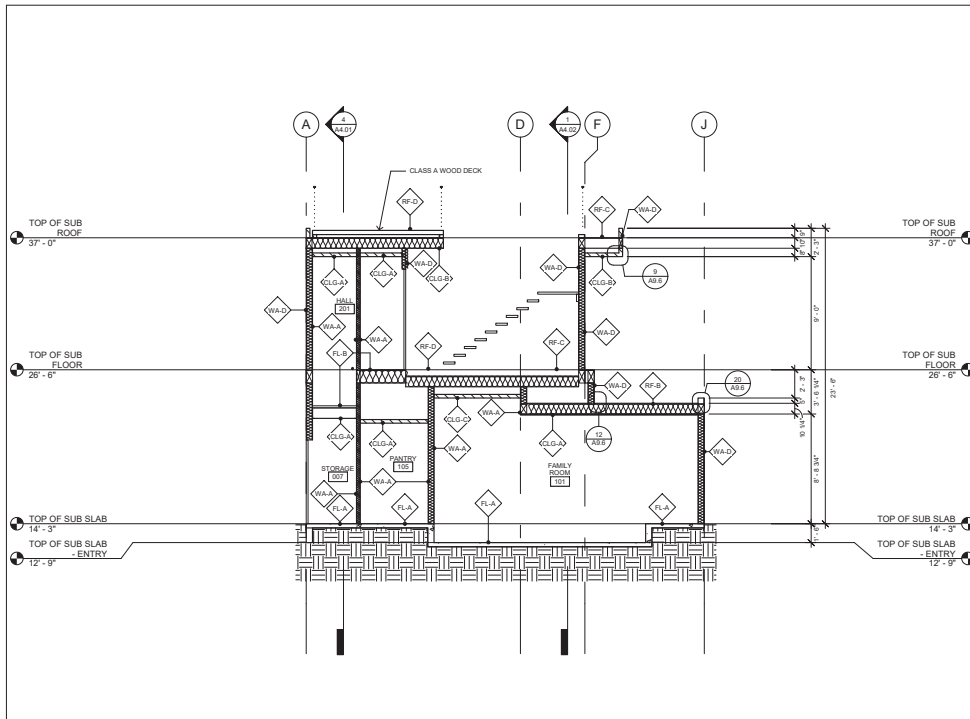


SOUTH ELEVATION
1/4" = 1'-0"

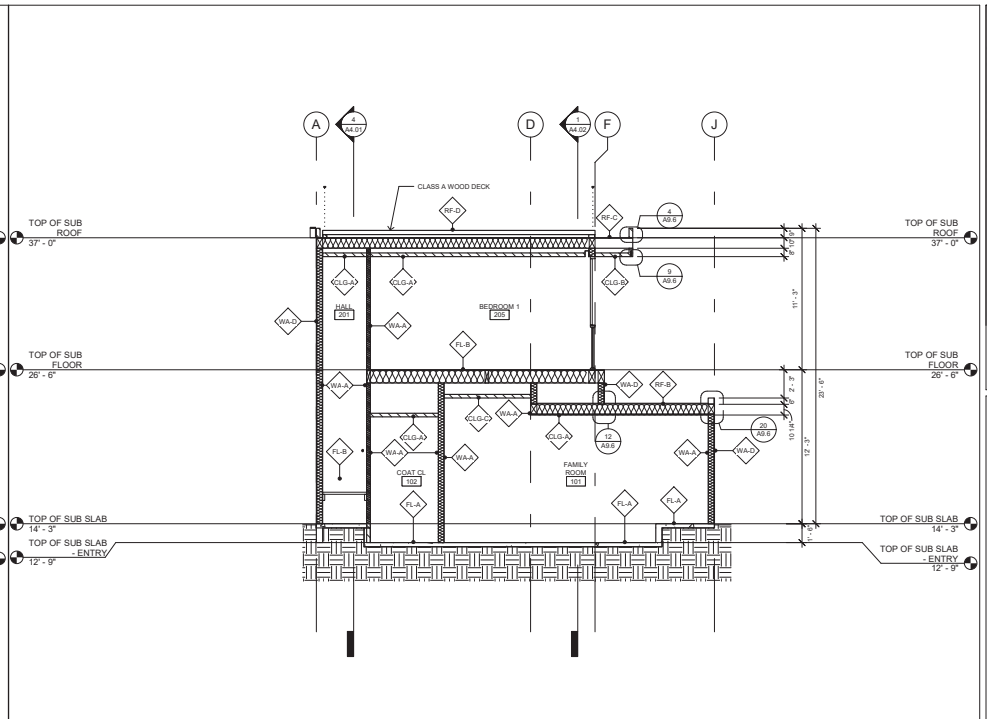
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MT-1	BRAKE METAL	MATERIAL: FINISH: FASTENING: NOTES:	ANODIZED ALUMINUM PT-3 22 GA ALUMINUM RIVETS HIGH AND LOW, OUT OF VIEW ALL SEAMS TO BE FLUSH. PROVIDE 1/2" BACKING IF NECESSARY PROVIDE MINIMUM OF (3) MOCKUPS FOR OWNER REVIEW. ARCHITECT TO PROVIDE COMMENTS PRIOR TO PROCEEDING WITH SUBSEQUENT MOCKUPS.
MT-2	METAL	MATERIAL: FINISH: NOTES:	ANODIZED ALUMINUM WESTERN WINDOW SYSTEM OIL RUBBED BRONZE ALL SEAMS TO BE FLUSH. PROVIDE 1/2" BACKING IF NECESSARY PROVIDE MINIMUM OF (3) MOCKUPS FOR OWNER REVIEW. ARCHITECT TO PROVIDE COMMENTS PRIOR TO PROCEEDING WITH SUBSEQUENT MOCKUPS.
PL-1	ACRYLIC PLASTER	FINISH: FINISH COLOR: MANUFACTURER: CONTACT: SUBMITTALS: QUALIFICATIONS:	POWERWALL FREEFORM #5705 STO CORP. SAN FRANCISCO, TEL: (714) 486-9113 / (800) 221-2307 WWW.STO.COM PROVIDE EXIST SAMPLES FOR COLOR AND FINISH TO MATCH ARCHITECTS SAMPLE, DATE, DESIRED COLOR AND FINISH IS ACHIEVED APPLICATION SHALL BE APPROVED BY STC. CONTRACTOR SHALL PROVIDE EXPERIENCED CREEPER TO ACHIEVE A UNIFORM FINISH WITH NO VISIBLE LIFT LINES ACROSS UNBROKEN SURFACES. GC TO COORDINATE A MINIMUM OF 3 ITO OBSERVATION REPORTS WITH SCHEDULE.

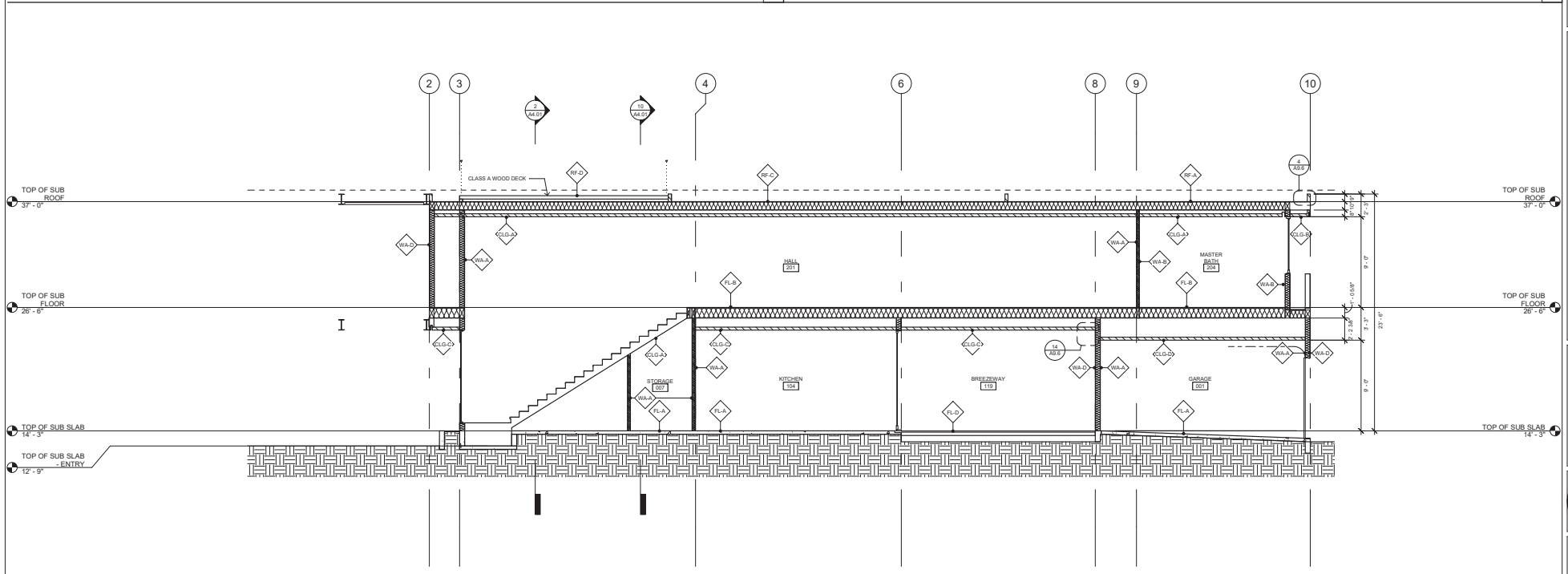
PT-3	PAINT (METAL)	MANUFACTURER: PRODUCT: COLOR: FINISH:	GLEDEN METAL PAINT FOREST BLACK LOW SHEEN SATIN FINISH APPLY PER MANUFACTURERS SPECIFICATIONS
PT-4	PAINT (EXTERIOR DOORS)	MANUFACTURER: PRODUCT: COLOR: FINISH: NOTES:	BENJAMIN MOORE AURA EXTERIOR PAINT DRAGON'S BREATH SAT FLAT V PER MANUFACTURERS SPECIFICATIONS PROVIDE MINIMUM OF THREE SEPARATE 12"x12" SAMPLES FOR OWNERS REVIEW. PRESSURE SURFACE TO MANUFACTURERS INSTRUCTIONS
WD-9	WOOD VENEER PANEL	WOOD VENEER: STAIN: COLOR: FINISH: NOTES:	ROUGH SAWN WHITE OAK VENEER ARBORECAT EXTERIOR STAIN DRAGON'S BREATH SAT (2) COATS ULTRA FLAT (2) COATS MODERN MATTERS 'DEAD FLAT' VARNISH (DPH00) APPLY PER MANUFACTURERS SPECIFICATIONS PROVIDE MINIMUM OF THREE SEPARATE 12"x12" SAMPLES FOR OWNERS REVIEW.
WD-10	CEDAR WOOD SIDING	MANUFACTURER: MATERIAL: FINISH: REMARKS:	CUSTOM PRESSURE TREATED 4X4 POST, 2X4 RAILS, ROUGH SAWN 1X6 CEDAR BOARDS, 2X4 GROOVED CEDAR CAP VALUOLIFT TREATMENT INSTALL PER MANUFACTURERS COMPLETE SPECIFICATIONS. PROVIDE FOR NECESSARY FENCE COMPONENTS FOR A COMPLETE INSTALLATION. INSTALL PRESSURE-TREATED 2X4 RAILS AT HEIGHTS INDICATED IN DETAILS



TRANSVERSE BUILDING SECTION 02
1/4" = 1'-0" 10



TRANSVERSE BUILDING SECTION 01
1/4" = 1'-0" 2



LONGITUDINAL BUILDING SECTION 01
1/4" = 1'-0" 4

Exhibit 5 – Streetscape Analysis

CONTEXT:

- Approx. 40 properties
- 2/3 of the properties are modern, 1/3 are traditional/sloped roof
- Approx. 20 properties are 2 stories
- Approx. 5 properties are multi-family

- Many projects are built closer to the street than the current 15' required setback.
- Neighboring homes (630 and 624) are two story structures with similar setbacks to our proposed project. 630 is a modern multi-family and 624 is single-family dwelling with a mix of modern and traditional style

