CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E Ocean Blvd., Suite 300 Long Beach, CA 90802-4302 (562) 590-5071



W17a

P-3-20-78-2978-A1 (2918 3rd St, LLC) SEPTEMBER 8, 2021

EXHIBITS

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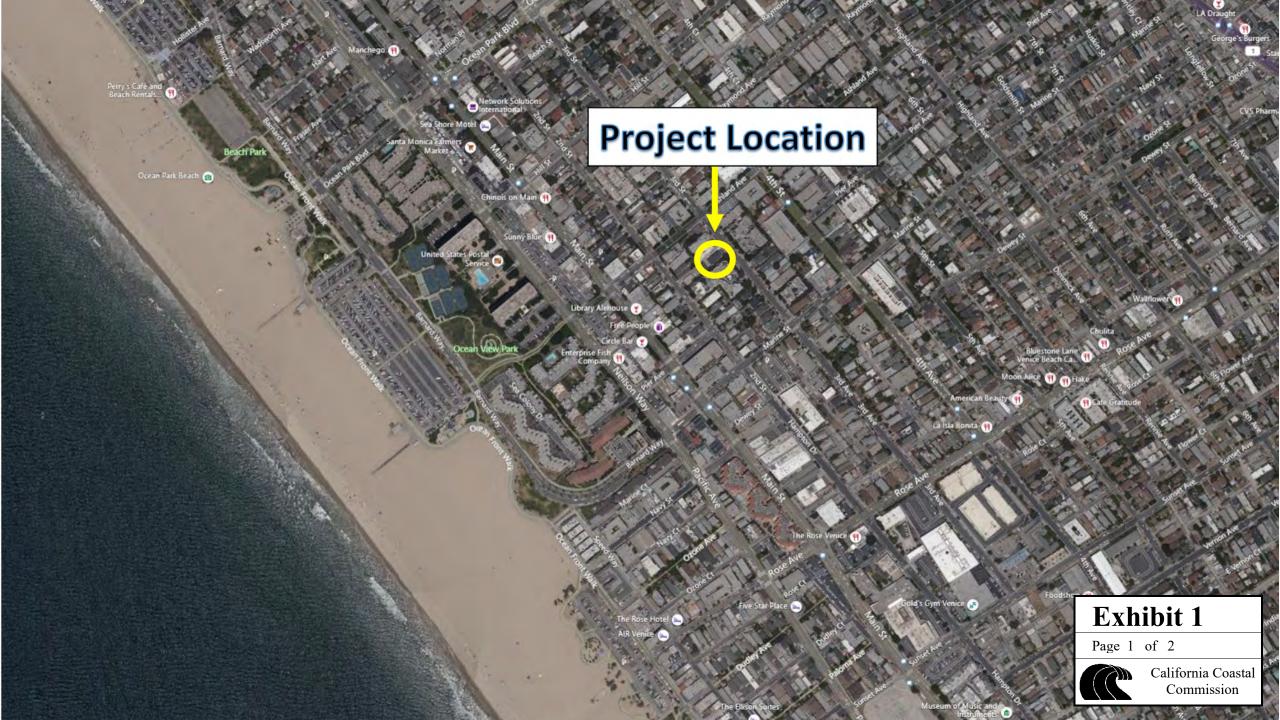
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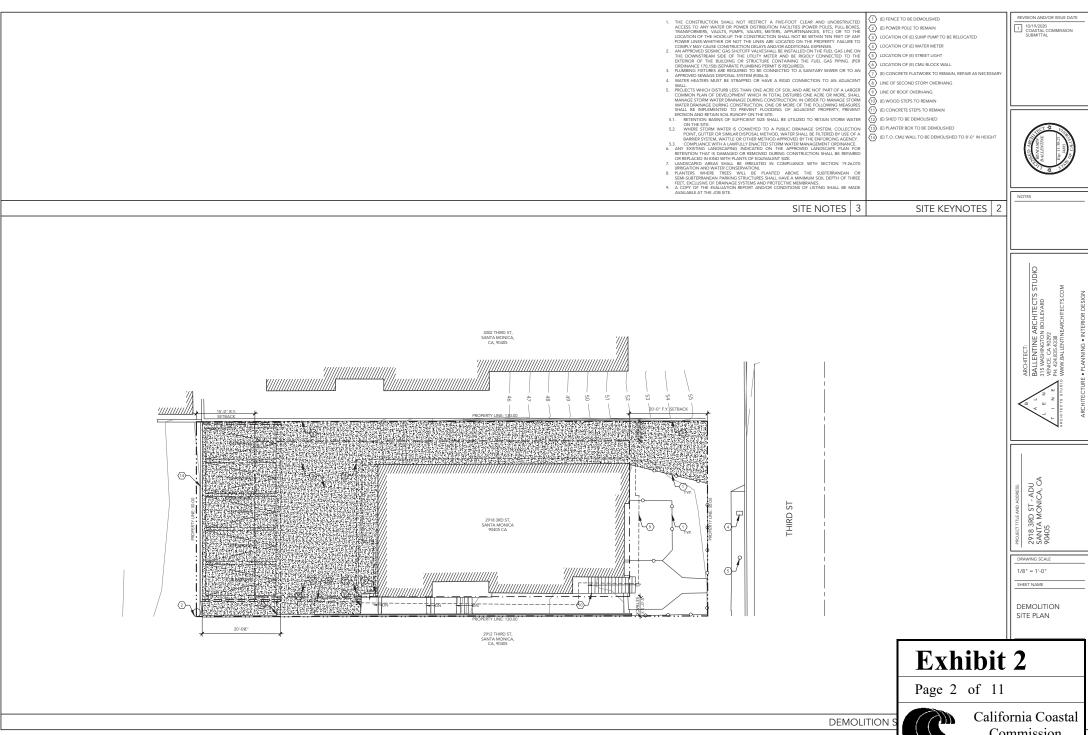


2918 3RD ST - ADU

SANTA MONICA, CA 90405

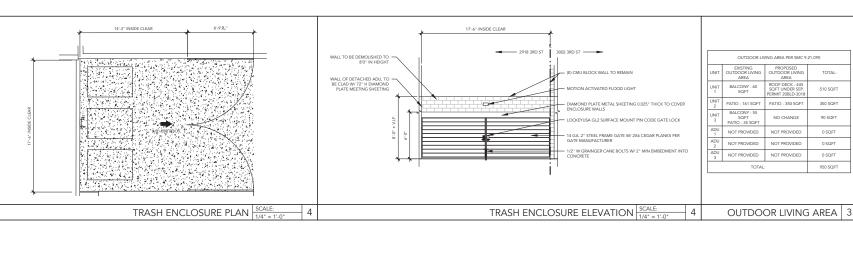
SANTA MONICA, CA 70403								
& And < Angle	D.D. Driveway Drain, Deck Drain D.F. Drinking Fountain	GL. Glass, Glazing GND. Ground	N.I.C. Not in Contract NO. Number	SHR. Shower SHT. Sheet	PROJECT LOCATION:	2918 3RD ST, SANTA MONICA, CA 90405	ARCHITECTURAL DRAWINGS	
At C Centerline	DBL. Double DFT Detail	GR. Grade GYP. BD. Gypsum Board	NOM. Nominal N.S. No Scale	SHT'G Sheating	BLOCK:	В	A1.01 TITLE SHEET	
O Diameter or Round _ I Perpendicular	D.F. Drinking Fountain DIA. Diameter	H. High	N.T.S. Not to scale	SLDG. Sliding SPEC. Specification	LOT: TRACT:	4 SANTA FE TRACT	A1.11 GENERAL NOTES A1.12 GENERAL NOTES	ACT X
# Number (E) Existing	DIA. Diameter DIM. Dimension DISP. Dispenser/ Disposal	H.B. Hose Bib H.C. Hollow Core	O/ Over O.A. Overall	SQ. Square SQ. FT. Square Foot S.S. Stainless Steel	APN:	4287-024-005	A1.13 GREEN BUILDING A1.14 SPECIFICATIONS	
A. Area	DN. Down D.O. Door Opening DR. Door D.S. Downspout D.S.P. Dry Standpipe	H.B. Hose Bib H.C. Hollow Core HCP. Handicapped HDR. Header	OBSC. Obscure O.C. On Center	SPEC. Specification SQ. Square SQ. FT. Square Foot S.S. Stainless Steel S.SK. Service Sink	ZONE:	SM OP2	A1.15 TITLE-24	NZAM LENT 11-30 SASS1
A.A.P.E. Abv. Approved Pad Elev. A.B. Anchor Bolt	DR. Door D.S. Downspout	HDWR. Hardware HDWD. Hardwood	O.DIA. Outside Diameter O.D. Overflow Drain (Roof Plan)	STD. Standard STI Steel	CONSTRUCTION TYPE:	TYPE V-B (NON-SPRINKLERED)	A1.16 TITLE-24 A1.17 TITLE-24	
A.B. Anchor Bolt A/C Air Condition(ing) ACR Acrylic	D.S.P. Dry Standpipe DWG. Drawing	HDWR. Hardware HDWD. Hardwood H.M. Hollow Metal H.P. High Point	O.F.C.I. Owner Furnish Contractor Insta O.H. Over Head	alled STOR. Storage STRUCT. Structural	OCCUPANCY TYPE:	R2	A2.01 DEMOLITION SITE PLAN A2.11 PROPOSED SITE PLAN	
A.C. Asphaltic Concrete AC.T. Acoustical Ceiling Tile	DWR. Drawer DWP. Drywall Painted	HORIZ. Horizontal HR. Hour	O.H.D Over Head Door OFF. Office	STWY. Stairway SKL. Skylight SK. Sink	LOT SIZE:	6,547 SQ. FT.	A3.01 DETACHED ADU FLOOR PLAN A3.02 DETACHED ADU ROOF PLAN	
ACOUS. Acoustical ADJ. Adjustable / Adjacent	D.W. Dish Washer DX. Duplex	HT. Height HVAC. Heating, Ventilation & Air C	O.H. Overhang	SK. Sink SUSP. Suspended	DETACHED ADU:		A3.10 ATTACHED ADU DEMOLITION PLAN	NOTES
ADD Addition	F East	H.W. Hot Water HWY. Highway	OPNG. Opening	SW. Switch SYM. Symmetrical	STORIES:	2	A3.11 ATTACHED ADU FLOOR PLAN A5.01 EXTERIOR ELEVATIONS	
A.F.F. Above Finish Floor	EA. Each	I.D. Inside Diameter	OPP. Opposite OUT. Outlet OR. Omamental	SYS. System	MAXIMUM STORY LIMIT:	2	A5.02 EXTERIOR ELEVATIONS A6.01 SECTIONS	
ALT. Alter or Alternate ADA Americans with Disabilities Act ALUM. Aluminum		IN. Inch INFO Information	PC. Piece	T. Tread T.B. Towel Bar	BUILDING HEIGHT:	19'-2"	A6.02 SECTIONS	
ANOD. Anodized	ELEV. Elevator	INCL. Including INSUL. Insulation /Insulate	P.C.PL Portland Cement Plaster PED. Pedestal	T.B. Towel Bar T&G Tongue & Groove	BUILDING HEIGHT LIMIT:	23'-0" PER OP2 ZONING CODE	A9.01 DOOR & WINDOW SCHEDULE	
A.P. Access Panel APPROX. Approximate ARCH. Architectural	EMER. Emergency ENCL. Enclosure E.O.S. Edge of Slab	INT. Interior INSTL. Install	P.G Paint Grade PERIM. Perimeter	T.C. Top of Curb T.D. Top of Drain TEL. Telephone	SETBACKS:			
ASPH. Asphalt	EQ. Equal EQUIP. Equipment	I.P. Iron Pipe	P.D. Planter Drain	TEMP. Tempered, Temperate TER. Terrazzo	SIDE: REAR:	4'-0" 4'-0"		
BD. Board BDY. Boundary	E.S.H.A. Environmentally Sensitive Hab	bitat Area JAN. Janitor J-BOX. Junction Box	PL. Plate Line P.L. Property Line PLBG. Plumbing	THK. Thick, Thickness	FLOOR AREA:	4-0		STUDIO
BITUM. Bituminous	E.W. Each Way	JST. Joist	P.LAM. Plastic Laminate	THR. Threshold TOIL. Toilet	EXISTING CARPORT TO BE	900 SQ. FT.		
BLDG. Building BLK. Block	E.WP .H. Electric Water Heater (E),EXIST. Existing	JT. Joint KIT Kitchen	PLAS. Plaster PLYWD. Plywood	T.O.P. Top Of Pad T.O.S. Top Of Sheathing	DEMOLISHED:			S S NO.
BLKG. Blocking BM. Beam	EXP. Expansion EXPO. Exposed	K.S Kitchen Sink	PR. Páir PH. Phase	T.P. Top of Pavement T.P.D. Toilet Paper Dispenser	ADU A (GROUND FLOOR):	582 SQ. FT. 582 SQ. FT.		ARCHITECTS 2 1EARCHITECTS 4 1ATERIOR DESIGN
BRG. Bearing BOT. Bottom	EXT. Exterior EX. Exit	KO. Knockout	PT. Paint P.T. Pressure treated	T.S. Tube Steel T.V. Television T.O.W. Top of Wall	ADU B (SECOND FLOOR):			HIT HEV
B. Bathroom B.R. Bedroom B.T. Bathtub	F.A. Fire Alarm	LAM Laminate LAV. Lavatory L.F. Lineal Foot	P.T.D. Paper Towel Dispenser PTN. Partition	TYP Typical	ADD. PARCEL COVERAGE:	687 SQ. FT.		ARC BOLD
BLT-IN. Built- In	F.A.R Floor Area Ratio F.D. Floor Drain	L.H. Left Hand	PKG. Parking P.U.E. Public Utilities Easement	T&B Top & Bottom T.O.C Top of Curb T.O.M Top of Masonry	ATTACHED ADU:			1.1 NE A GTON 90292 4338 4338 1.1 NI
BS.BN. Both Sides Bull Nose	F.D. Floor Drain FDN. Foundation F.E. Fire Extinguisher F.F Finish Floor	LKR. Locker LNDG. Landing	QUAL. Quality	T.O.M Top of Masonry T.O.PP Top of Parapet T.O.R.D Top of Roof Deck	STORIES:	2		ING SEAS
B.U.R. Built Up Roofing B.L Building Line B.V.L Bevelled	F.E.C. Fire Extinguisher Cab	LNDG. Landing LR. Living Room LT. Light LVR. Louver	QUANT. Quantity Q.T. Quarry Tile		MAXIMUM STORY LIMIT:	2		ARCHITECT BALLENTI BALLENTI 315 WASHIN PH: 424.835. WWW.BALLE
B.V.L Bevelled	F.G.L Fiber Glass	L.CL. Linen Closet	RI. Riser	UNF. Unfinished U.O.N. Unless Otherwise Noted	BUILDING HEIGHT: BUILDING HEIGHT LIMIT:	19'-2" 23'-0" PER OP2 ZONING CODE		BRAL BRAL 315 / 315 / VENI WWW
CAB. Cabinet CARP. Carpet	F.H.C. Fire Hose Cabinet F.H Fire Hydrant	LMS. Limestone L.V. Low Voltage	RAD. Radius R.D. Roof Drain REF. Reference	UR. Urinal UP. Unpainted UT. Utility	SETBACKS:			18 8
CARP. Carpet C.B. Catch Basin CBL. Concrete Block	FIN. Finish FLASH. Flashing	MATL. Material	RETG. Retaining		FRONT:	10'-0"		ECT STE
CEM. Cement CER. Ceramic	FLR. Floor FLUOR. Fluorescent	MAR. Marble MAX. Maximum	REFR. Refrigerator REINF. Reinforced or Reinforcing	VARN. Vamish V.B Vapor Barrier	SIDE: REAR:	4'-0" 4'-0"		
CEM. Cement CER. Ceramic C.I. Cast Iron CLG. Celling CLO. Closet CLR. Clear CLR. Clear C.M.U. Concrete Masonry Unit CNTR. Counter	F.O.C. Face of Concrete F.O.F. Face of Finish	M.B. Machine Ball M-BOX, Mail Box	REQ. Required REM. Remove	VERT. Vertical VEST. Vestibule V.I.F. Verify in Field	FLOOR AREA:			AR STATE OF THE ST
CLO. Closet CLR. Clear	F.O.M. Face of Masonry F.O.S. Face of Stud	MECH. Mechanical MEMB. Membrane MEZZ. Mezzanine	RESIL. Resilient REV. Revised RFG. Roofing	V.I.F. Verify in Field VOL. Volume	(E) FLOOR AREA: LAUNDRY:	150 SQFT	SHEET INDEX 4	
C.M.U. Concrete Masonry Unit CNTR. Counter	FPRF. Fireproof FR. Frame	MEZZ. Mezzanine MTL. Metal MFR. Manufacture	RFG. Roofing R.H. Right Hand RM. Room	VOL. Volume VIN. Vinyl V.P Vent Pipe	STORAGE:	232 SQFT	GEOTECHNICAL PRELIMINARY GEOTECHNICAL REPORT (DATED JULY 13, 2020)	
COL Column CONC. Concrete COND. Condition	F.R.T Fire Retardant F.S. Full Size Foot, F.P.L Fire Place	MFR. Manufacture MH. Manhole MIN. Minimum	RM. Room R.O. Rough Opening	V.T.R Vent through Roof	GARAGE:	241 SQFT		
COND. Condition CONN. Connection	F.P.L Fire Place FT. Feet	MIR. Mirror	R.O.W Right of Way RWD. Redwood	W. West W/ With	(N) FLOOR AREA: ATTACHED ADU:	700 SQFT	ASBESTOS LIMITED ASBESTOS SURVEY (DATED JUNE 19, 2020)	
CONN. Connection CONST. Construction CONT. Continuous	FT. Feet FTG. Footing FURR. Furring,Furred	MISC. Miscellaneous M.O. Module	S. South	W/O Without WIN. Window	PARKING:		, , , , ,	
CONTR. Contractor	FURN. Fumiture FUT. Future	MOD. Masonry Opening MONO. Monolithic	S.AC.T. Suspended Acoustic Tile S&S Stained & Sealed	W.H. Water Heater W/0 Without	(E) PARKING PROVIDED	5	CATALOG OF REPORTS 3	½ > 5
COML. Commercial C.T. Ceramic Tile	FIX. Fixture	M.R. Moisture Resistant MTD. Mounted	S&V Stained & Varnish S.C. Solid Core SCUP. Scupper	W.C. Water Closet WD. Wood WP. Waterproof	(N) PARKING PROVIDED:	2 PER CA GOVT. CODE 65852.2 (B) (xi) (CARPORT. PUBLIC TRANSIT IS LOCATED WITHIN 0.1 MILES OF PROPERTY, SEE	CATALOG OF REPORTS 3	CA LODRE
C/C Center to Center CTR. Center	G. Gas GAL. Gallon	MUL. Mullion MWK, Millwork	SCUP. Scupper SCHED. Schedule S.D Soap Dispenser	WP. Waterproof WPM. Waterproof Membrane		VICINITY MAP)	DEMOLITION OF (E) 900 SQ. FT. 5-CAR CARPORT AND CONSTRUCTION OF (2) DETACHED ADUS PER CA GOVT. CODE 65852.2. CONVERSION OF	ST ST ONI
COML Commercial C.T. Ceramic Tile C/C Center to Center CTR. Center CAV. Cavity CTSK. Countersunk	GAL. Gallon G.C. General Contractor GTR. Gutter	N. North	S.D Soap Dispenser S.G Stain Grade SECT. Section	WPM. Water proof Membrane W.M Water Meter WSCT. Wainscot	ALL CONSTRUCTION TO C	OMPLY WITH 2020 SANTA MONICA MUNICIPAL CODE, TITLE 24 &	(E) LAUNDRY, STORAGE, AND GARAGE (623 SQFT) INTO (N) 700 SQFT	P S S
C.W. Cold Water	GA. Gauge / Gage Galvanized GALV. G.B.Grab Bar	NAT. Natural (N) New	SECT. Section SEP. Separation, Separate	W.S.P. Wet Stand Pipe WT. Weight	2019 CALIFORNIA GREEN CALIFORNIA MECHANICAL	BUILDING CODE, 2019 CALIFORNIA BUILDING CODE (CBC), 2019 CODE (CMC), CALIFORNIA PLUMBING CODE (CPC), CALIFORNIA	ATTACHED ADU.	NATA 33
D. Deep,Depth	G.I. Galvanized Iron	N.I. Not Included	SH. Shelf	W.I. Wrought Iron	ELECTRICAL CODE (CEC), A	ND CALIFORNIA ENERGY CODE (CENC).		PROJECT TITLE AND ADDRESS: 2918 3RD ST - ADU SANTA MONICA, CA 90405
				ABBREVIATIONS 8		PROJECT DATA 6	SCOPE OF WORK 2	DRAWING SCALE
DETAIL	AREA DETAIL	DOOR AND WINDOW CALLOUTS	SECTION	WORK POINT CONTROL	PU	BLIC TRANSPORTATION	OWNER GEOTECHNICAL ENGINEER	N.T.S.
			<u>52011614</u>	POINT OR DATUM POINT		Starbucks 4th SB & Ashland NS	FRIGGER ASSOCIATES LTD. PARTNER ENGINEERING AND C/O BRYAN S. GORTIKOV SCIENCE, INC.	
					Sea Colony 3 P		2633 LINCOLN BLVD, #209 1761 E. GARRY AVENUE SANTA MONICA, CA 90405 SANTA ANA, CA 92705	SHEET NAME
DETAIL NO.	i i I	WINDOW SYMBOL	<u> </u>	1	1	PROJECT LOCATION —	T: 714-244-3014 ARCHITECT	COVER SHEET
X.X SHEET NO.	X DETAIL NO.	(xxx) DOOR SYMBOL	X SECTION NO.	•		Ashland Hill 🕡	BALLENTINE ARCHITECTS STUDIO	COVER SHEET
	X.X SHEET NO.		SHEET NO.		1	2918 3rd Street O	PRINCIPAL-IN-CHARGE: BENJAMIN BALLENTINE, AIA	
						Library Alehouse 1	315 WASHINGTON BLVD, SUITE 2 VENICE, CA 90292	
INTERIOR ELEVATION	EXT. ELEVATION	CONSTRUCTION	WALL SECTION	NORTH ARROW	1		T: 424-835-4338	
		TYPE SYMBOL			Ocean View Park®	n 14 14	STRUCTURAL ENGINEER SEAN ENGINEERING BRINGIPA UNICLA BEGINGE SEAN BRINGIPA UNICLA BEGINGE SEAN	7
XX GRID SPACE NO.		0507:011115		***	, low rolls			
ELEVATION NO. SHEET NO.	X ELEVATION NO. SHEET NO.	SECTION NO. SHEET NO.	SECTION NO. SHEET NO.	(Sea	Colony\II Condos 👽	GALBREATH, S.E.	
	\sim	V			South Beach Park Playground	Wells Fargo Bank (S)	PASEDENA, CA 91106 Page of I	
						₽ Bulletproof Coffee	T: 323-744-0010	
						3	Califo	ornia Coastal
				SYMBOLS 7		VICINITY MAP 5	118	
							Cor	mmission







Commission





REVISION AND/OR ISSUE DATE 10/19/2020 COASTAL COMMISSION SUBMITTAL



SITE KEYNOTES 2

THIRD ST 15 29'-2¹/₁₆' 2912 THIRD ST, SANTA MONICA, CA, 90405

1/8" = 1'-0"

SHEET NAME SITE PLAN

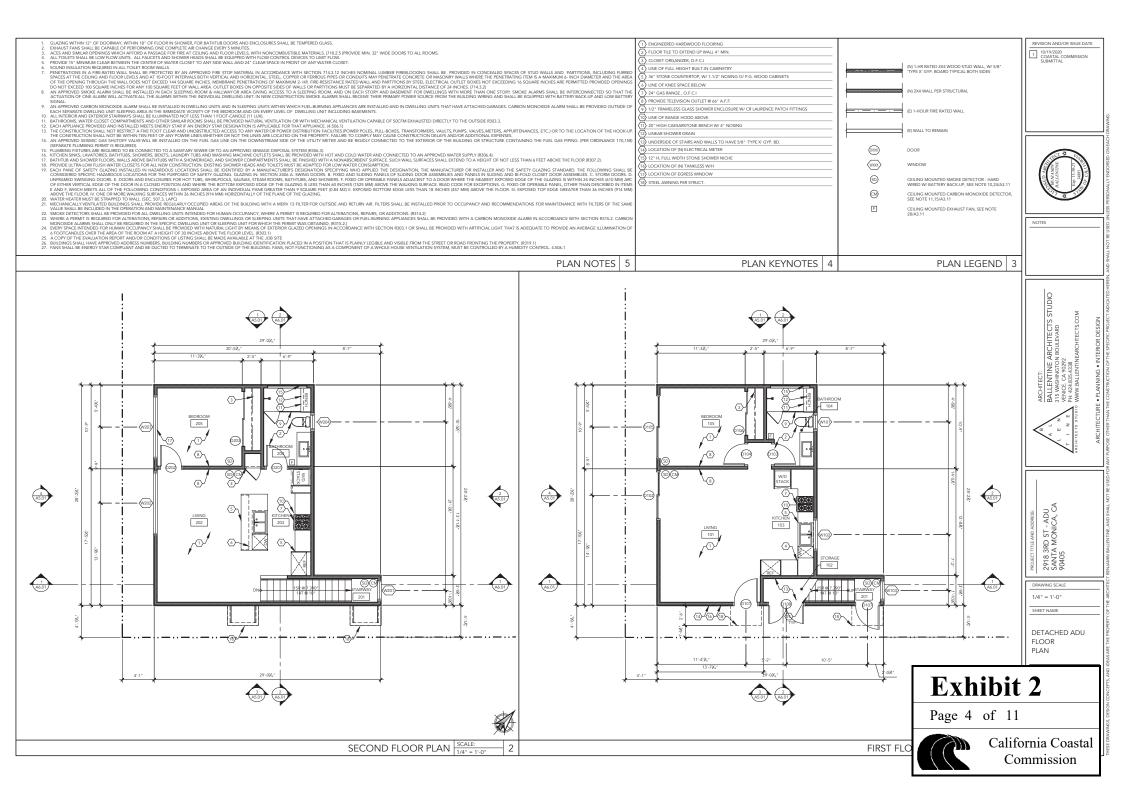
Exhibit 2

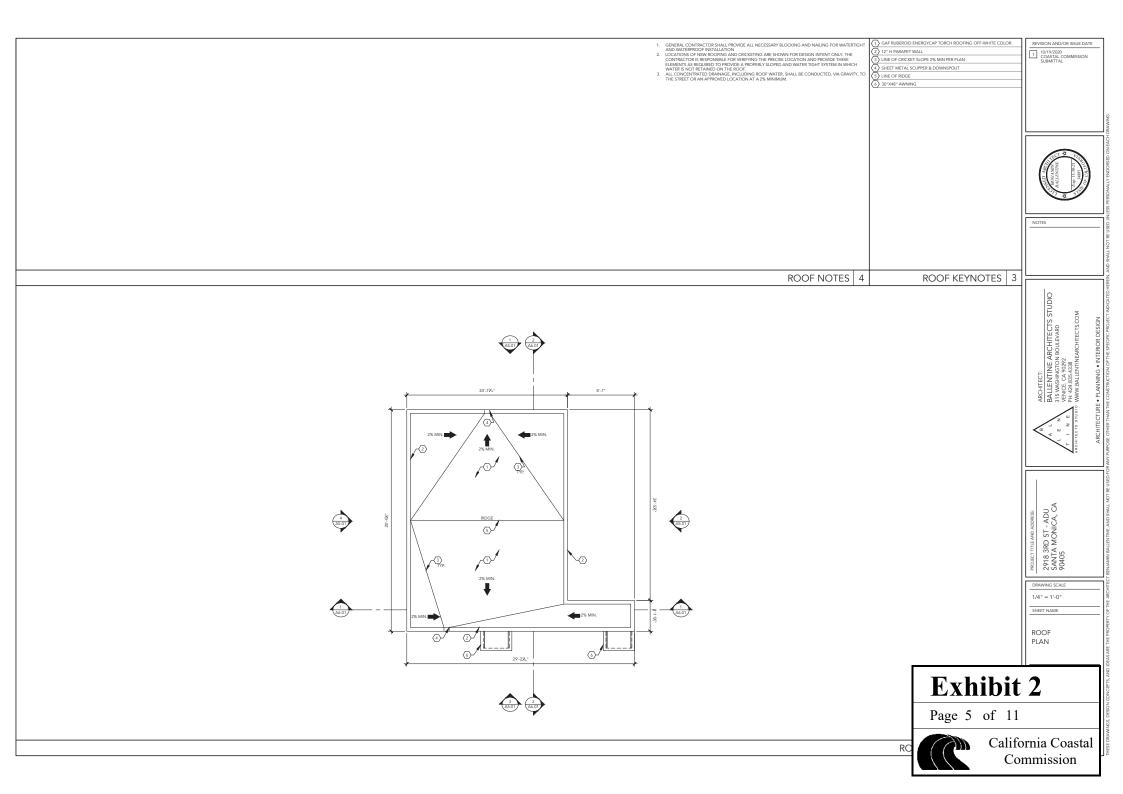
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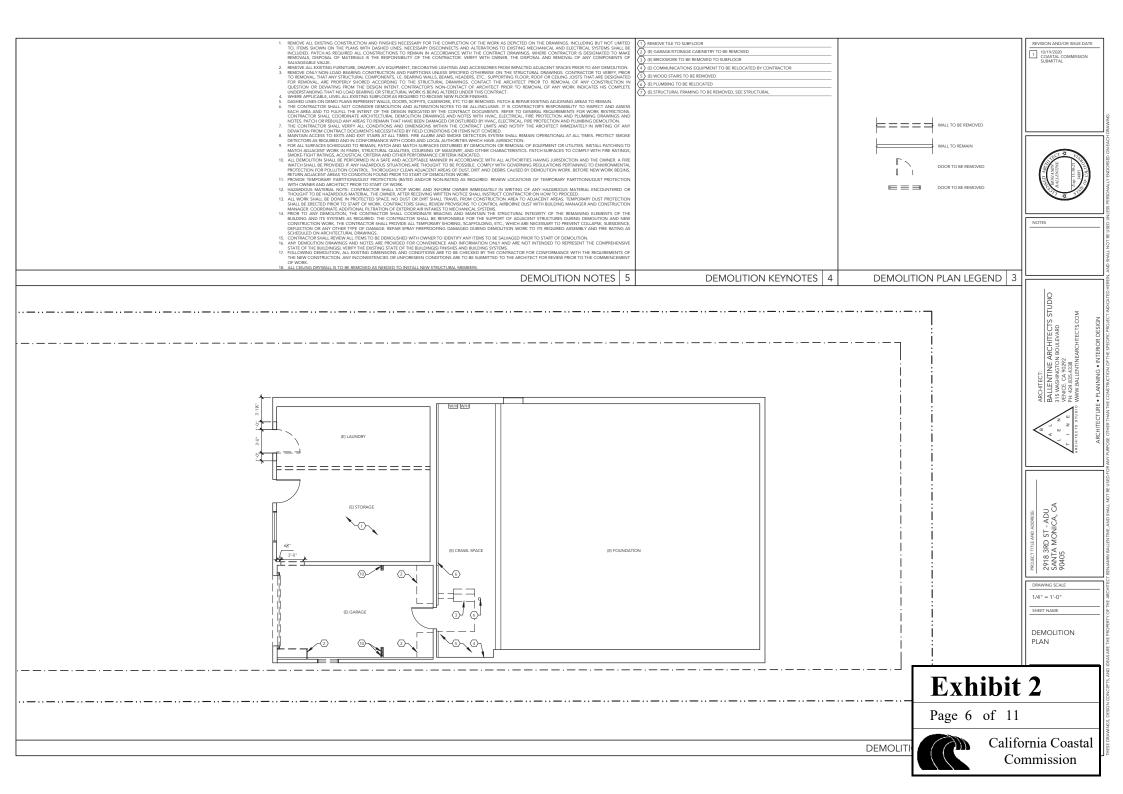


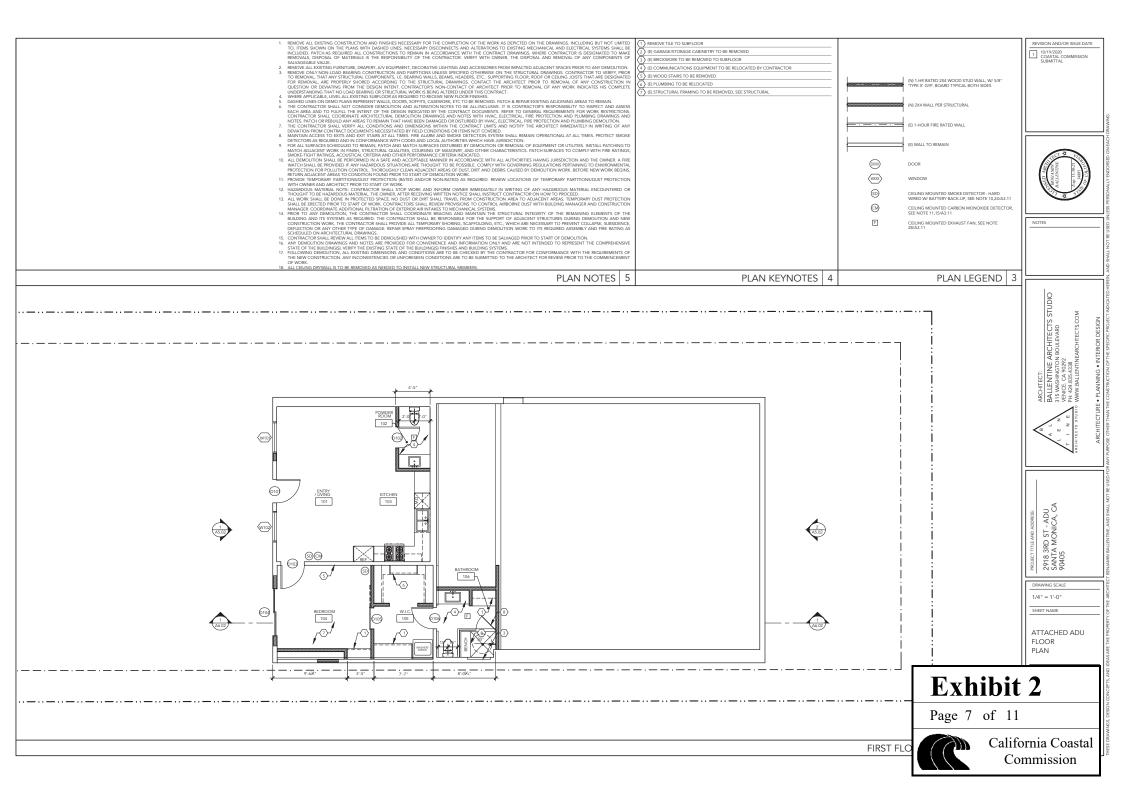
PROPOSED

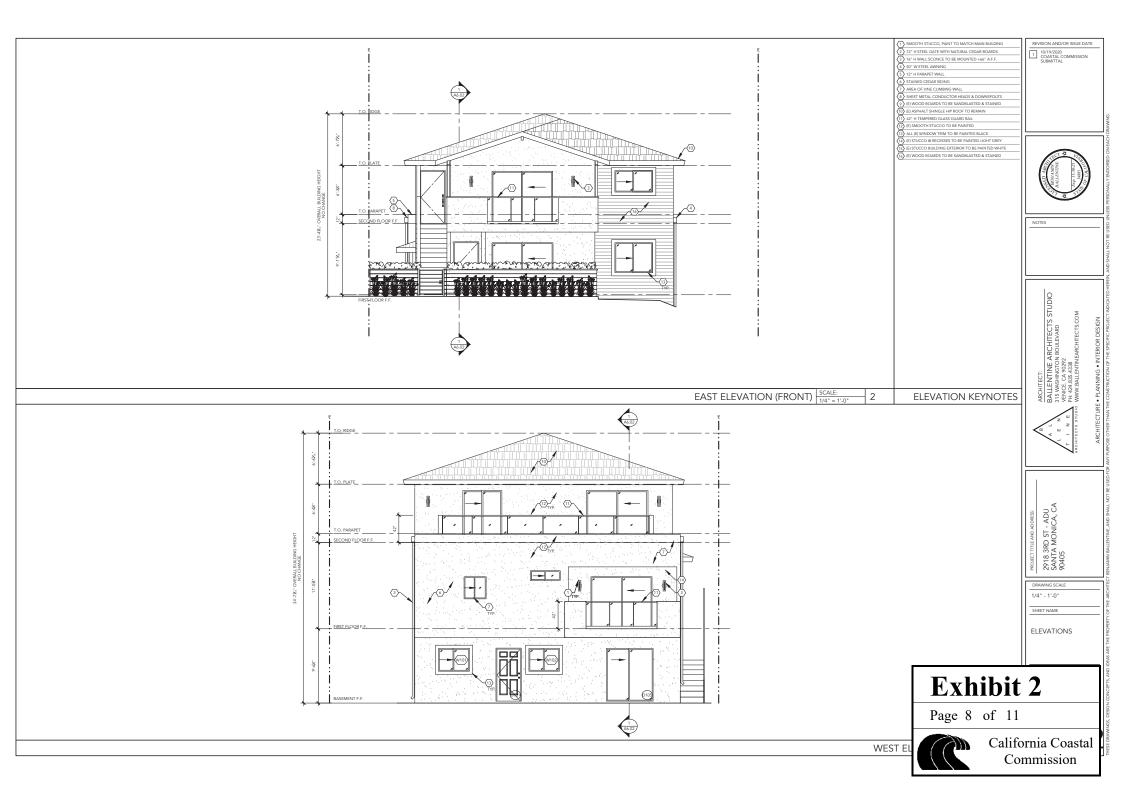
California Coastal Commission

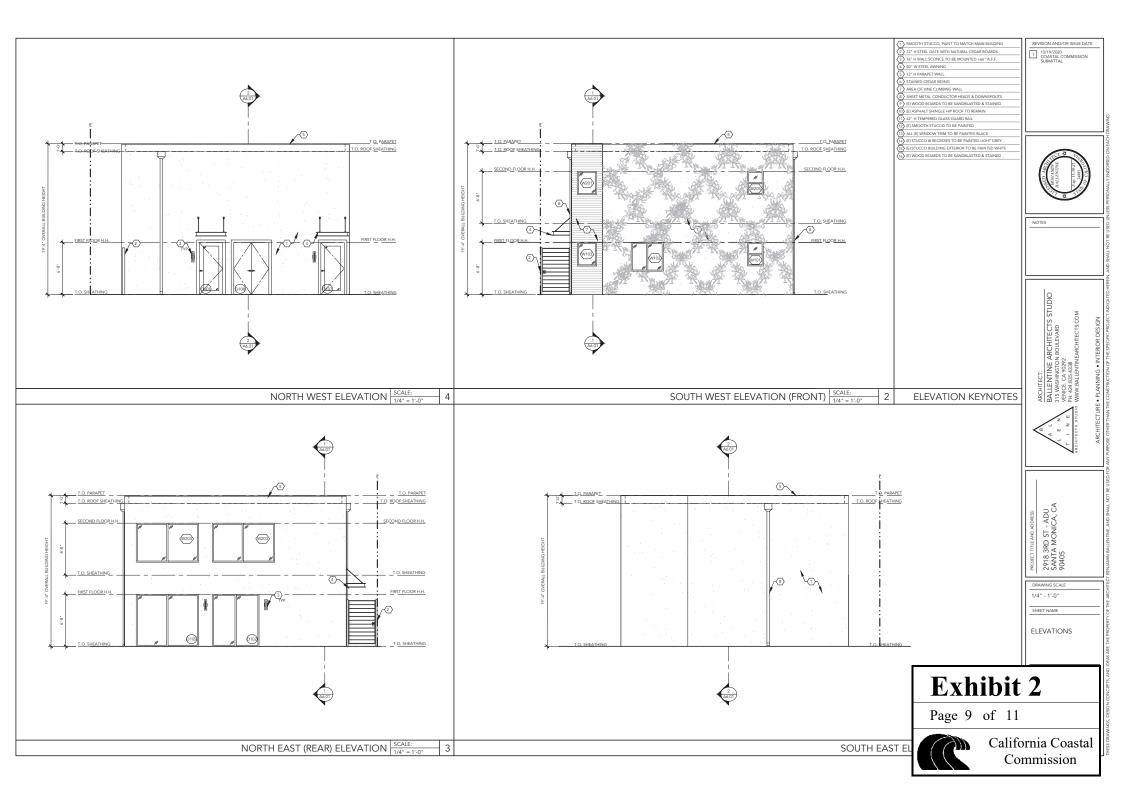


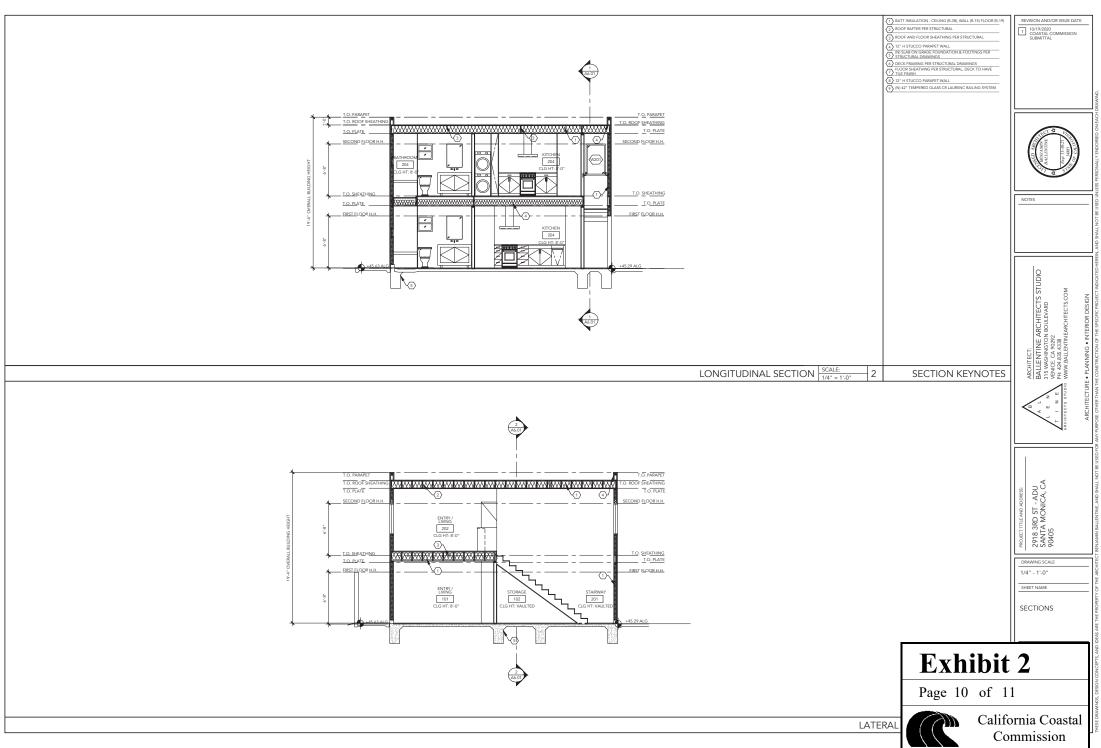




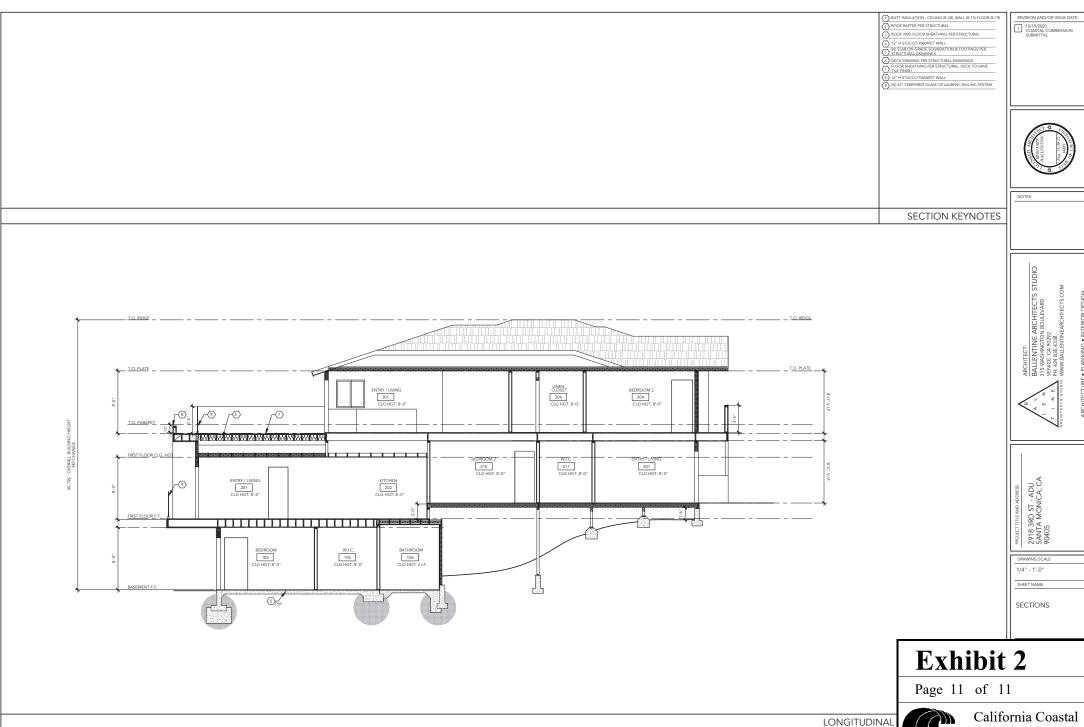














Commission



January 12th, 2021

California Coastal Commission - South Coast Area Office 301 E Ocean Blvd., Suite 300, Long Beach, CA 90802 Application Number: 5-20-0607

Project Address: 2918 3rd St, Santa Monica, CA 90405

Dear Vince,

In response to your notice of incomplete application letter, we wish to respond to the following additional information to help your review of the ADU development located at 2918 3rd St. Santa Monica.

Consistency with State ADU Laws:

The ADUs are consistent with all aspects of the State ADU Laws. Gov. Code § 65852.2 permits "at least one accessory dwelling unit within an existing multifamily dwelling and shall allow up to 25 percent of the existing multifamily dwelling units." The proposed development includes one new ADU in an existing storage/laundry space. Additionally, the State ADU Laws permit "Not more than two accessory dwelling units that are located on a lot that has an existing multifamily dwelling, but are detached from that multifamily dwelling..." The proposed development includes two detached ADUs at the rear of the lot. This area previously was partially occupied by a carport, which will be removed as part of the development. The state law notes that local agencies "shall not impose parking standards for an accessory dwelling unit" when "The accessory dwelling unit is located within one-half mile walking distance of public transit." The proposed development is 0.1 miles from the nearest bus station at Main and Marine Street, and there are seven (7) Santa Monica Big Blue Bus lines within a 0.5 mile walk, including a Rapid line.

Lastly, the project is in compliance with the development standards imposed by the State ADU Laws. The unit sizes are 516 SQ.FT. and 565 SQ.FT., which is below the 850 SQ.FT. maximum. The building height is 21'-1", which is below the 23'-0" maximum. Other guidelines, setbacks, etc. are in compliance with State ADU laws.

Project Alternatives Analysis:

There are numerous aspects of this site makes it nearly impossible to meet the legal standards required to maintain the existing number of parking stalls while adding new ADUs. The existing multi-family building occupies the front of the parcel, leaving the rear portion of the property as the only area available for either detached ADUs or parking. Unfortunately because access to the rear of the property is provided via an existing driveway a **Exhibit 3**

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side of the property, turning radius and backup distance make it technically impossible to maintain the same number of legal parking stalls. In fact, current parking standards are so rigid that even the existing parking spaces would not meet the current code, which has changed since the buildings construction in 1979. Existing parking is legal non-conforming – it does not meet the current code. Further, setback and building separation requirements only reduce the available buildable area. In addition, SMMC 9.21.130 imposes Resource Recovery and Recycling Standards, which require an extraordinarily large enclosure at the rear the property.

Please note that while the analysis above applies to new, legal parking spaces that are in compliance with Santa Monica City code, in practice the tenants of the building will be parking an additional 3 cars in the area in front of the trash enclosure and an area in the front yard. These additional 3 spaces do not qualify as legal spaces due to the backup distance, but in practice they will function similar to the existing spaces on-site. Including these spaces, there will be 5 usable parking spaces on site.

Although the State ADU laws do not require replacement of any of the parking stalls being demolished to make room for the new Detached ADU, we have worked closely with the Mobility and Planning departments at the City of Santa Monica to facilitate two legal parking spaces. This is the maximum feasible amount, given SMMC chapter 9.28, Off-Street Parking Requirements.

Santa Monica is a city that thrives on public transportation and according to the City of Santa Monica Community Development Department, "The City of Santa Monica has one of the most extensive transit networks among Cities of its size. 17% of residents ride the Big Blue Bus at least a few times a week and 12% ride some other transit service as often." In addition to public transportation, the city has miles and miles of bike lanes, the closest being two blocks away. For off-site parking, there is abundant permit parking for residents on the street as well as public parking lots 0.2 miles away. Prior residents at 2918 3 rd Street have elected to use off-site permit parking in lieu of on-site parking because despite its coastal location, there is an overabundance of parking available in this particular area.

Kind regards,

Clayton Young



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February 3, 2021

California Coastal Commission – South Coast Area office 301 E Ocean Blvd., Suite 300, Long Beach, CA 90802

Application Number: 5-20-0607

Project Address: 2918 3rd Street, Santa Monica, CA 90405

Re: Response to Request for Additional Parking Information, Exploration of Alternatives

Dear Vince,

This memorandum has been prepared in response to your request for further relating to parking in support Application No. 5-20-0607. The California Coastal Commission ("CCC") commission has raised a concern regarding the reduction of legal parking spaces from five to two. We hope this memorandum and the associated exhibits highlight the thoughtful, detailed, and extensive efforts put forth by ownership, Ballentine Architects and our engineering team. Below and attached you will find details regarding the numerous planning, geometric, geographic and other constraints that limit the size and shape of the detached ADU footprint as well as the number of legal parking spaces. We are confident that our proposed plan represents the maximum number of viable parking spaces while maximizing the number of livable, affordable ADU units

Background

Ownerships interest are aligned with those of the CCC – it is our strong preference to maximize parking wherever possible to improve marketability of the property to prospective tenants and to improve tenants' quality of life.

The existing project contains five (5) legal parking spaces within a detached carport that complied with the City of Santa Monica's development standards at the time of construction in 1979. Because the City of Santa Monica considers the carport to be an "existing structure", new "detached" ADUs cannot be added to the carport structure.

California's new ADU laws permit the removal of parking spaces without limitation in the development of ADUs. This technically allows ownership to remove all five parking spaces in favor of building the largest permitted detached ADU building. While this would be the most profitable strategy for the ownership, we believe that maintaining usable parking on-site is a benefit to both tenants and to the community.

As this memorandum and attached exhibits will show, there are a total of five (5) parking spaces on site, however three of the spaces are not considered "legal" by the City. These spaces are viable, but non-conforming for reasons detailed below. Unfortunately, despite nearly a year of land surveys, exhaustive massing studies, extensive and detailed discussions with numerous divisions of the City of Santa Monica (including mobility, planning, and waste management), there were a few specific constraints that required us to reduce the *legal* parking count from five to three. Those issues are as follows:

- **Site topography.** The property is situated on a slope, with more than 15' of height differential from the eastern to western property line.
- **Site geometry.** At 130' x 50', the property is long and narrow. The driveway ramp is approximately 10'11" wide, which makes the usable space even more narrow. This geometry makes parking difficult due to limited back up distance and limited turning radii.
- Location of existing structure. The existing residential structure is located in the center of the lot, limiting the size of the rear yard to approximately 46' x 50'. This rear yard is extremely tight given that this must contain the detached ADU footprint, all parking stalls, rear and side yard setbacks, open space for required backup distance, an oversized trash enclosure to accommodate the City of Santa Monica, and open space in front of the trash enclosure. The location of the detached ADU is also limited by the required 10' of separation between new and existing structures.

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Exhibit 3



- Restrictive parking standards. A standard parking stall is 8' wide, meaning that maintaining five legal stalls would require 40' of width. This increases to 43' of width after including two 18" separations as required by the City when a parking stall is adjacent to a wall. The City of Santa Monica requires a backup distance of 40' in order for a parking stall to be legal. Put differently, maintaining five legal parking stalls requires a minimum 43' x 40' open space in the rear yard. This equates to almost 75% of the entire rear yard (approximately 50' x 46'), leaving no viable building footprint after factoring in setbacks, trash requirements, and required building separation.
- Trash enclosure requirements. This was the most surprising and difficult constraint to address in the development of our plans. For a 6-unit building the City of Santa Monica requires a minimum trash enclosure dimension of 21' x 7.5', which is enough to fit three 4' x 6' bins. This is an exorbitantly oversized trash enclosure relative to the number of residents we expect at the property it is the same size that the City would require for a 10-unit building comprised of all 3-bedrooms, yet it is imposed on this proposed ADU development, which is only 6 units, 1-2 bedrooms. In reality, the waste and recycling generated by the Property will be collected in four smaller 95-gallon bins (less than 3' x 3' each), which will be rolled to the street by hand once per week. This is how waste collection is done now, albeit with slightly smaller trash cans. Our proposed plan includes two parking spaces in front of one potential storage area for our 95-galllon bins, which is within the trash enclosure area. However, because the City assumes that Ownership may contract with the City to roll out waste bins at some point in the future, the city will not consider these legal as they encroach on the trash enclosure clearance. This is an unrealistic assumption given the limited waste production of our project. Note: Ownership has negotiated a slightly reduced enclosure size (from 21' down to 18'), which is already reflected in the plans submitted to Coastal.
- Trash Staging requirements. In addition to the extraordinary size of trash enclosure that must be added to our plans, this enclosure cannot exist in the front yard due the required enclosure exceeding the maximum height requirement of 42" in the front setback. As a result, the City also requires a "trash staging area" in the front setback, which is an area that bins can be temporarily stored during collection. Again, this area will not be used as the project does not generate enough waste to necessitate larger bins. Our proposed plan includes one parking stall in the trash staging area. Unfortunately, even if parking dimensions are met, the City will not consider it legal if it encroaches on the staging area.

Response 1. The Property Contains Additional Viable, Non-Conforming On-Site Parking.

For the reasons above, the City considers our proposed plans to have only two (2) *legal* parking stalls. However, we have intentionally designed the site in such a way that an additional three (3) cars are able to comfortably park on-site, for a total of five stalls – two legal, three non-conforming. Please reference the attached exhibit for a diagram.

Response 2. We have explored many other parking configurations, but none provide a viable alternative. Please see the attached exhibit, which contains many alternative parking diagrams and their disadvantages. There are only a select few parking configurations that allow for the construction of any ADU whatsoever. Of those options, our proposed option is the best combination of total number of viable parking spaces (including legal and non-conforming) and livable space for future occupants of the ADUs.

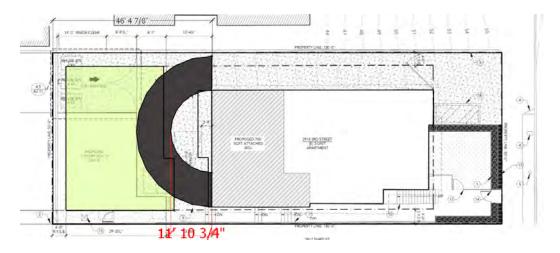
Response 3. Subterranean Parking is not viable.

We briefly explored the idea of subterranean parking. Unfortunately, the slope and location of existing structure would require us to have access to the subterranean garage in the rear yard. Given the location of the driveway and the required turning radius, we do not have enough room to access a subterranean garage I the rear yard; we can only provide an 11' 10" turning radius, which is not viable (typically need 15' or more). If the property was hypothetically larger and able to accommodate the required turning radius, such a garage would require a completely new foundation in the rear of the building, major structural modification throughout the building (including in occupied units), relocation of the underground electrical service, and relocation of plumbing; our general contractor, who has built dozens of subterranean garages in the City of Santa Monica, indicated that it would add more than \$500,000 of cost to the project, rendering it unprofitable.

Page 4 of 35

Exhibit 3





Response 4. Reducing number of ADUs would not affect on-site parking.

The proposed project will include two (2) detached ADUs and one (1) attached ADU. The attached ADU does not affect parking counts. Reducing the number of detached ADUs from two (2) to one (1) would allow us to increase the number of legal parking spaces from two to three, but it would reduce our non-conforming spaces from three to one. Put differently, we would end up with more "legal" spaces, but practically less parking overall. Further, this would have a devastating impact on the financial viability of this project as the rent associated with the detached building would be reduced by 50%, rendering the project unprofitable and not worth pursuing. Lastly, this would be inconsistent with the intent of the California ADU laws and with the Coastal Commissions mission of increasing the amount of affordable housing in coastal zones.

Response 5. Alternative parking is available.

The Property is located in close proximity to Main street in Santa Monica, which is a low-rise retail and restaurant district with significant public parking. The following lots are located within a 5-minute walk of the Property:

- Lot 9 110 Hill Street
- Lot 10 111 Hill Street
- Lot 11 170 Hollister Street
- Lot 26 150 Strand
- Lot 5S 2600 Barnard Way
- Lot 4S 2030 Ocean Avenue

A City Parking Map is shown as an Exhibit to this memo. Ownership has contacted the City of Santa Monica for parking lot occupancy and traffic data, but the City did not provide a response. Please also note that preferential permit parking is also available on 3rd and 4th Street and is widely available at all times of day.

Please reach out if you have any questions or if we can provide any other helpful support.

Best,

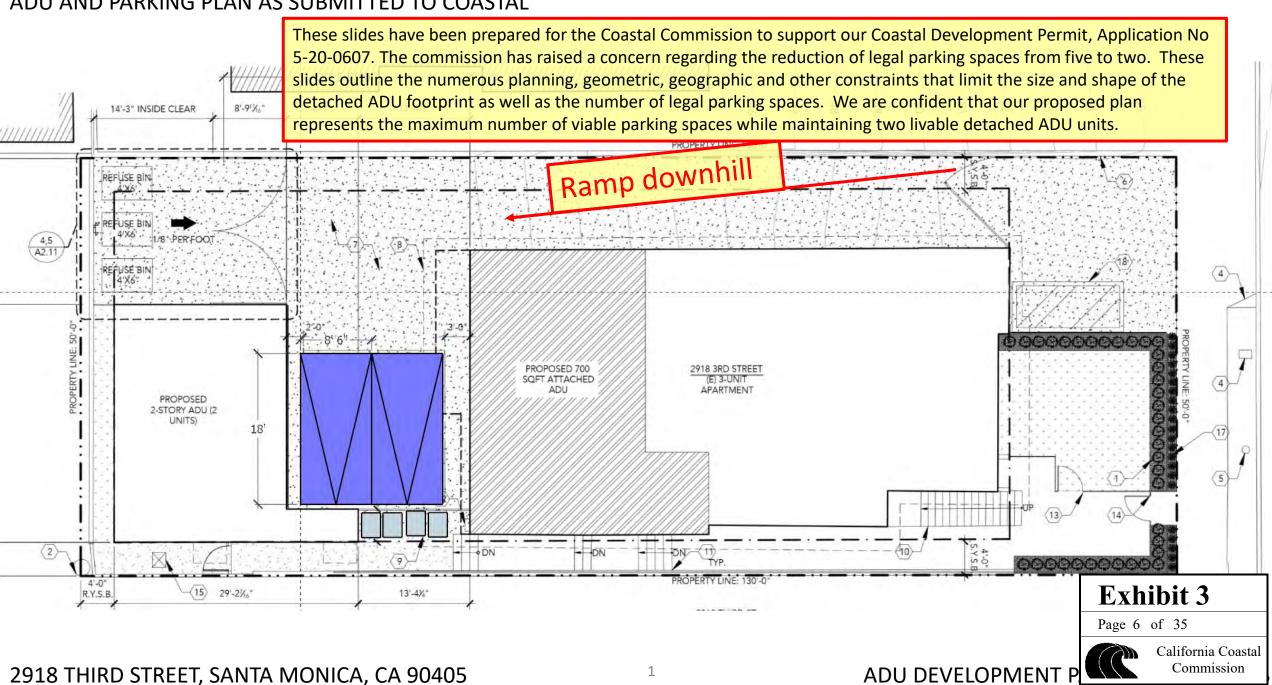
Bryan Gortikov, Manager Bean Third Street, LLC

bg@gortikovinc.com / 310-979-5721



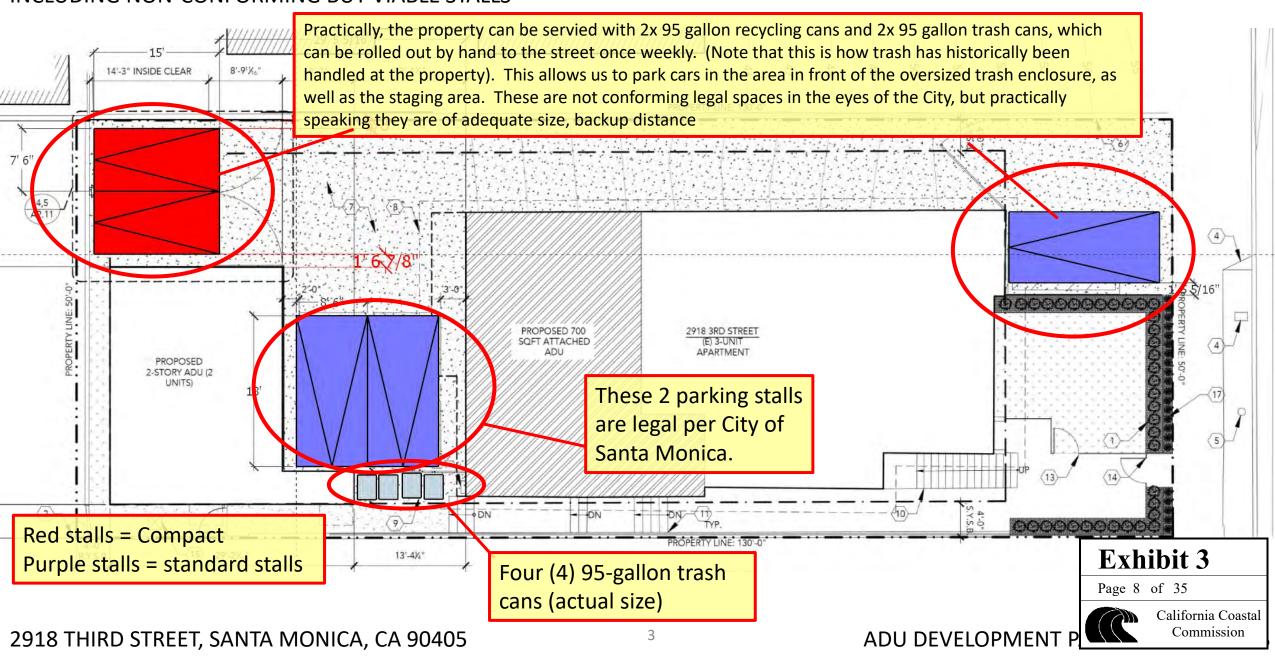


ADU AND PARKING PLAN AS SUBMITTED TO COASTAL



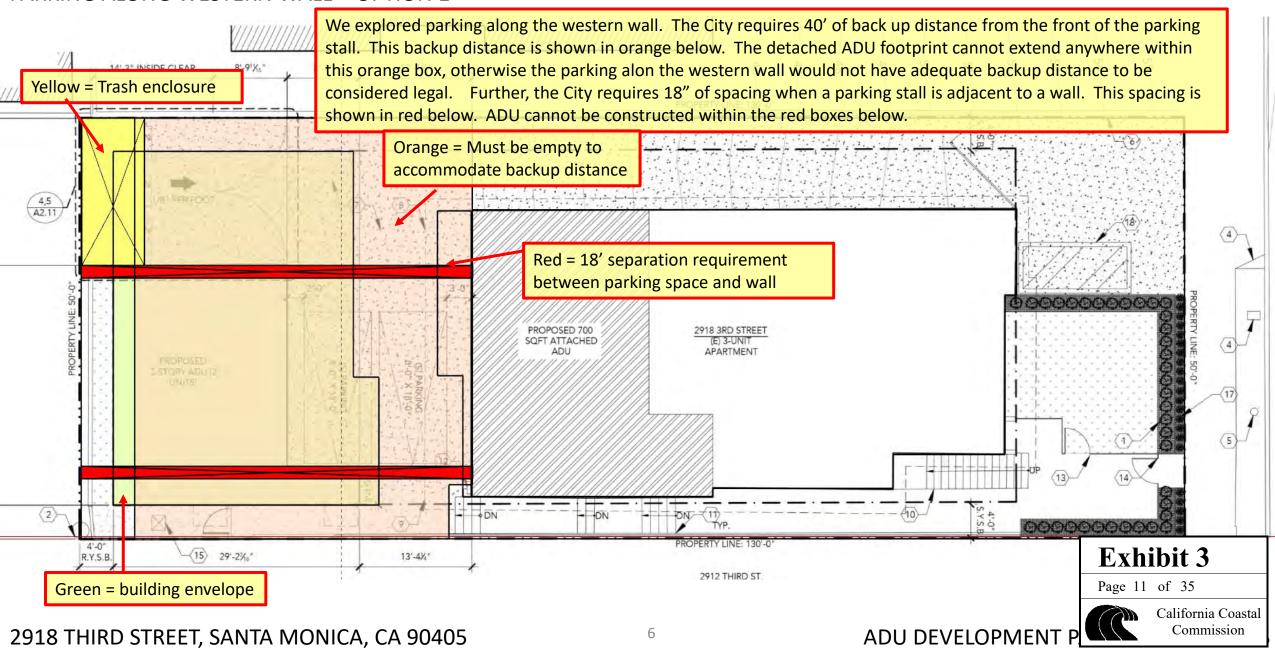
ADU AND PARKING PLAN AS SUBMITTED TO COASTAL Required trash enclosure dimensions per City of Santa Monica are dramatically oversized for actual need of the property, limiting parking options. City requires minimum 21' x 7.5' enclosure to fit three 4' x 6' bin – significantly Required trash more than is needed to service six units. Further, maximum height 8'-9'X." staging area. No requirements in front setback prohibit this enclosure from being placed in the front setback, which triggers an additional requirement for a trash staging area parking permitted as in the front setback, even further constraining the site. Note - we have it would affect negotiated a waiver for a smaller enclosure (18' instead of 21' width) staging area. (4)-PROPOSED 700 2918 3RD STREET SQFT ATTACHED **PROPOSED** 2-STORY ADU (2 These 2 parking stalls are legal per City of Santa Monica. +DN 000000000 4'-0" R.Y.S.B. (15) 29'-2%," Exhibit 3 13'-41/4" Page 7 of 35 California Coastal Commission **ADU DEVELOPMENT** 2918 THIRD STREET, SANTA MONICA, CA 90405

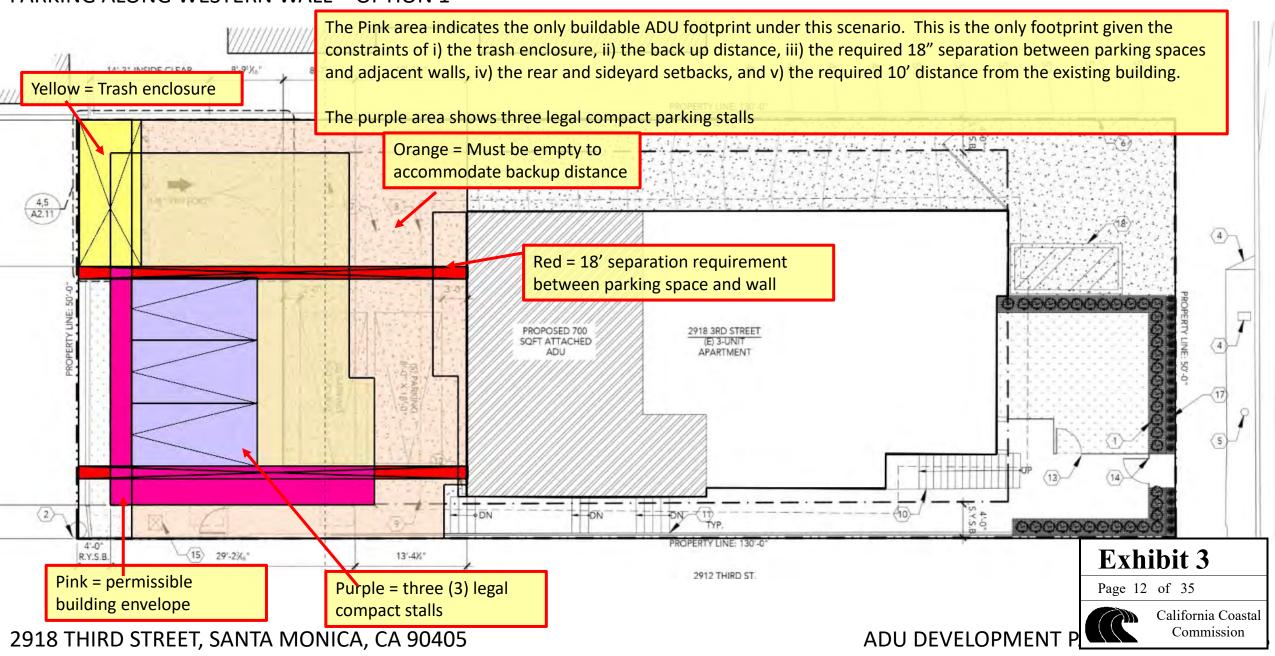
ADU AND PARKING PLAN AS SUBMITTED TO COASTAL – INCLUDING NON-CONFORMING BUT VIABLE STALLS

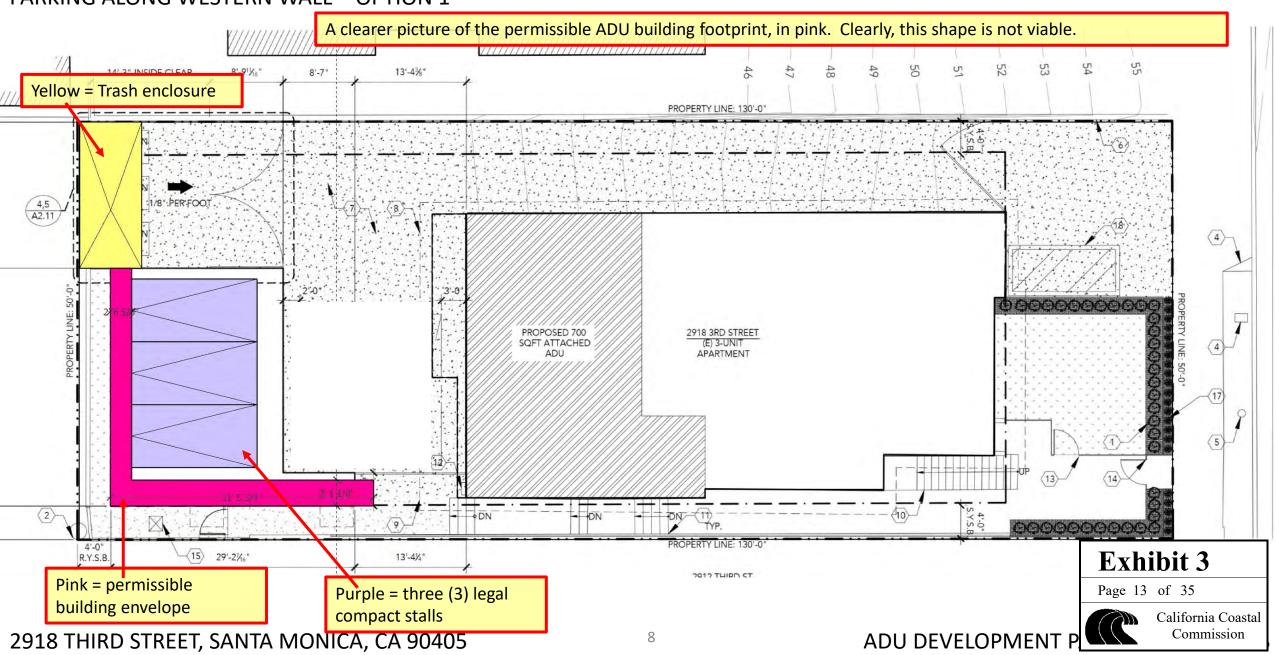


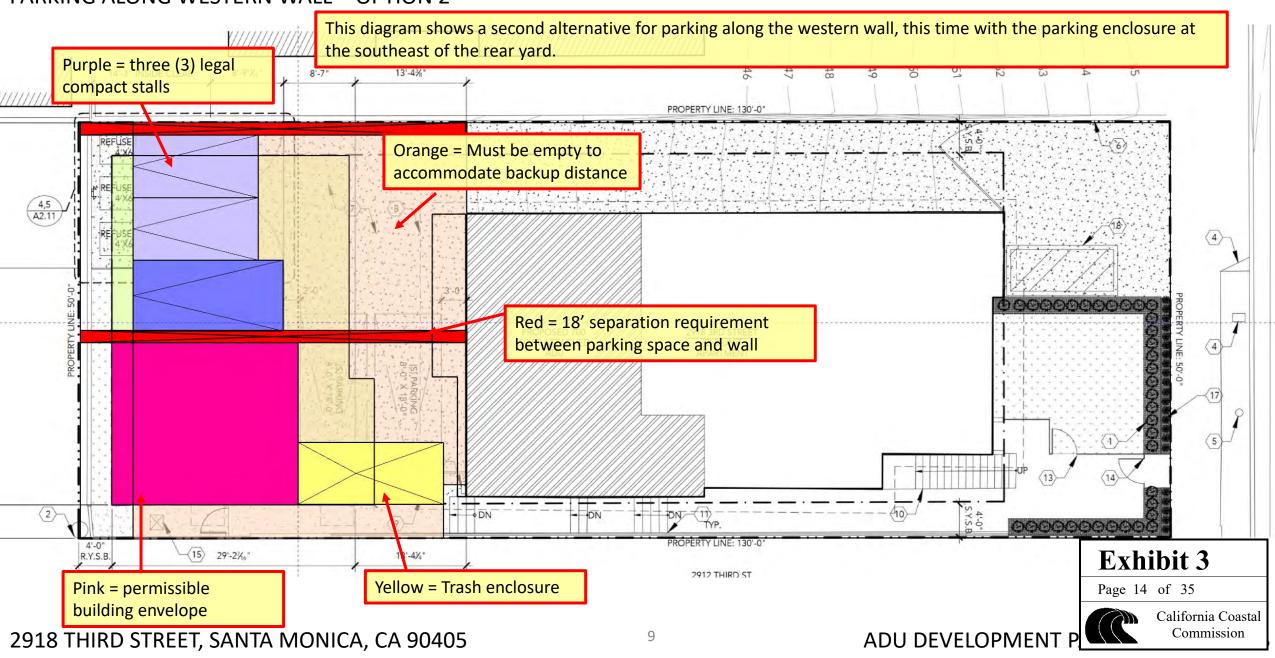
ALTERNATIVE PARKING EXPLORATION – **BUILDING ENVELOPE** During the six month development of our architectural plans, we explored a wide variety of ADU locations, ADU shapes parking configurations in an attempt to maximize parking onsite. The green box below indicates 8'-91% " 14'-3" INSIDE CLEAR the building envelope for ADUs based on a 4' side yard setback, 4' rear yard setback, and a 10' required distance between the ADU structure and the existing structure. The ADU footprint can only exist within the green shape below. REFLISE BIN 9 11.11/16 Green = building envelope PROPOSED 700 2918 3RD STREET SQFT ATTACHED APARTMENT PROPOSED Z-STORY ADU (Z •DN DN Exhibit 3 PROPERTY LINE: 130'-0 R.Y.S.B. 29'-27/4" 13'-4%" Page 9 of 35 California Coastal Commission ADU DEVELOPMENT P 2918 THIRD STREET, SANTA MONICA, CA 90405

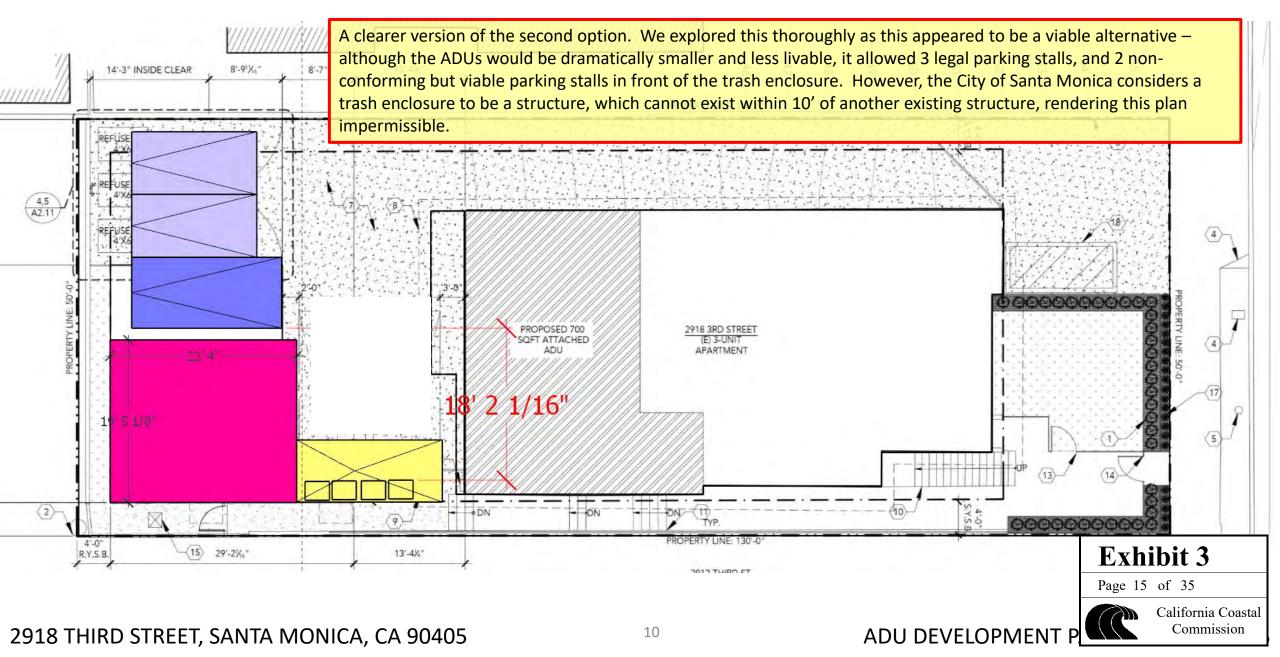
ALTERNATIVE PARKING EXPLORATION – **BUILDING ENVELOPE** As previously described, the building envelope is significantly reduced due to the required trash enclosure, which must be in the rear yard setback and must be directly accessible along the long side of the enclosure. The City will not allow building in front of the enclosure and will not consider a parking stall in front of the enclosure a "legal" space. Yellow = Trash enclosure PROPERTY LINE: 130'-0" 4,5 A2.11 (4)-11 11/16 PROPOSED 700 2918 3RD STREET Green = building envelope (2)-Exhibit 3 4'-0" R.Y.S.B. 29'-2% 13"4%" Page 10 of 35 California Coastal Commission ADU DEVELOPMENT P 2918 THIRD STREET, SANTA MONICA, CA 90405

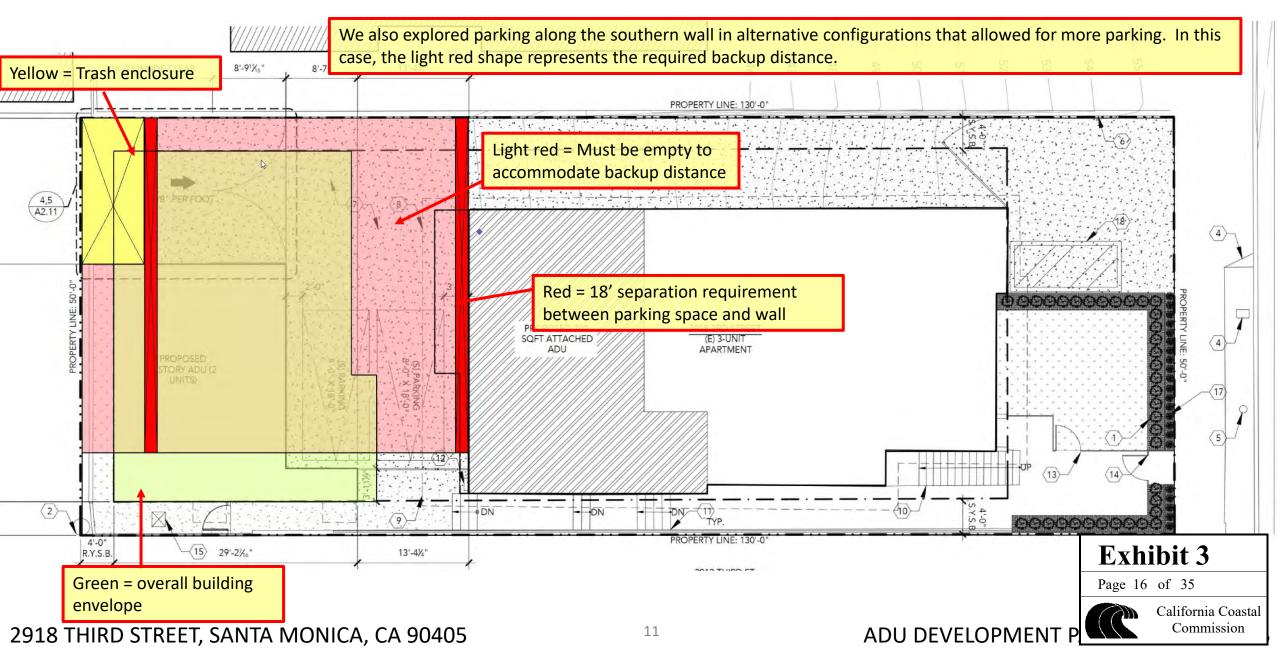


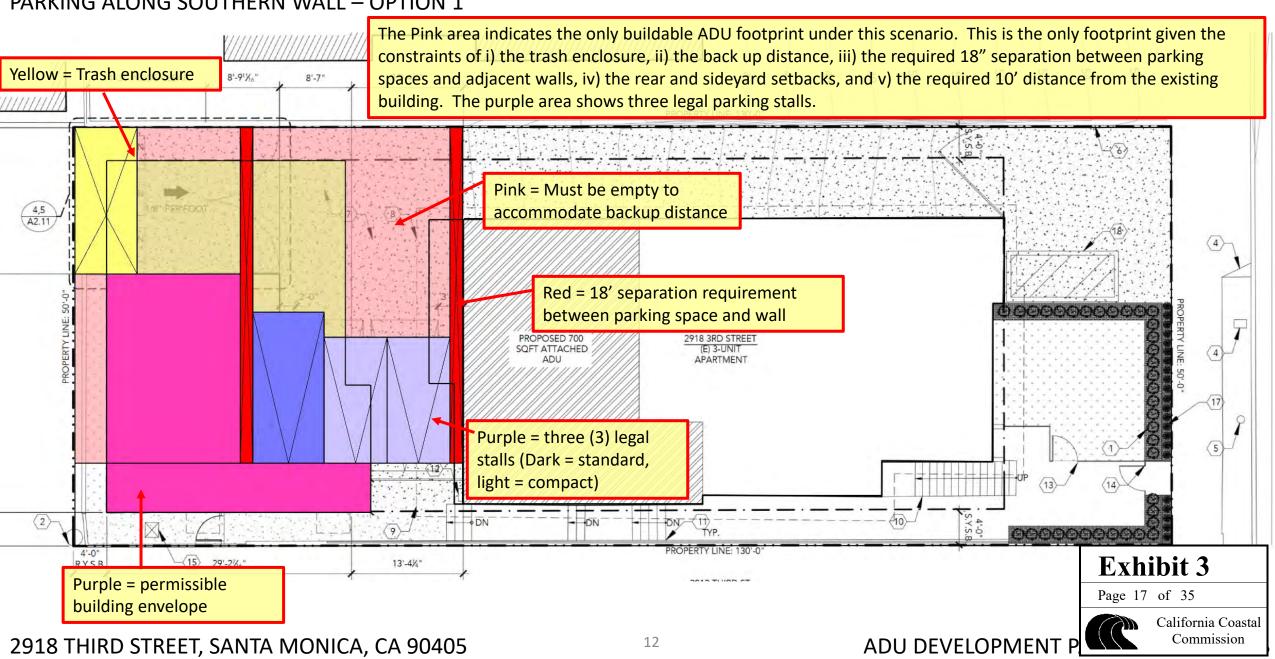


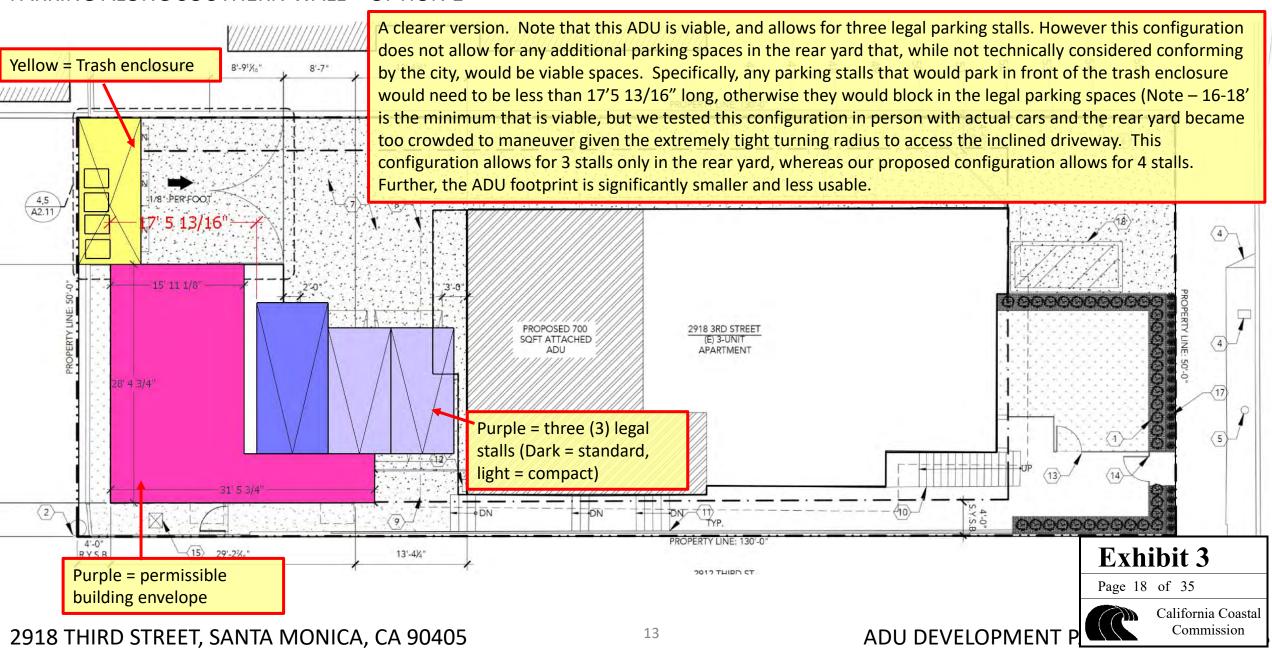




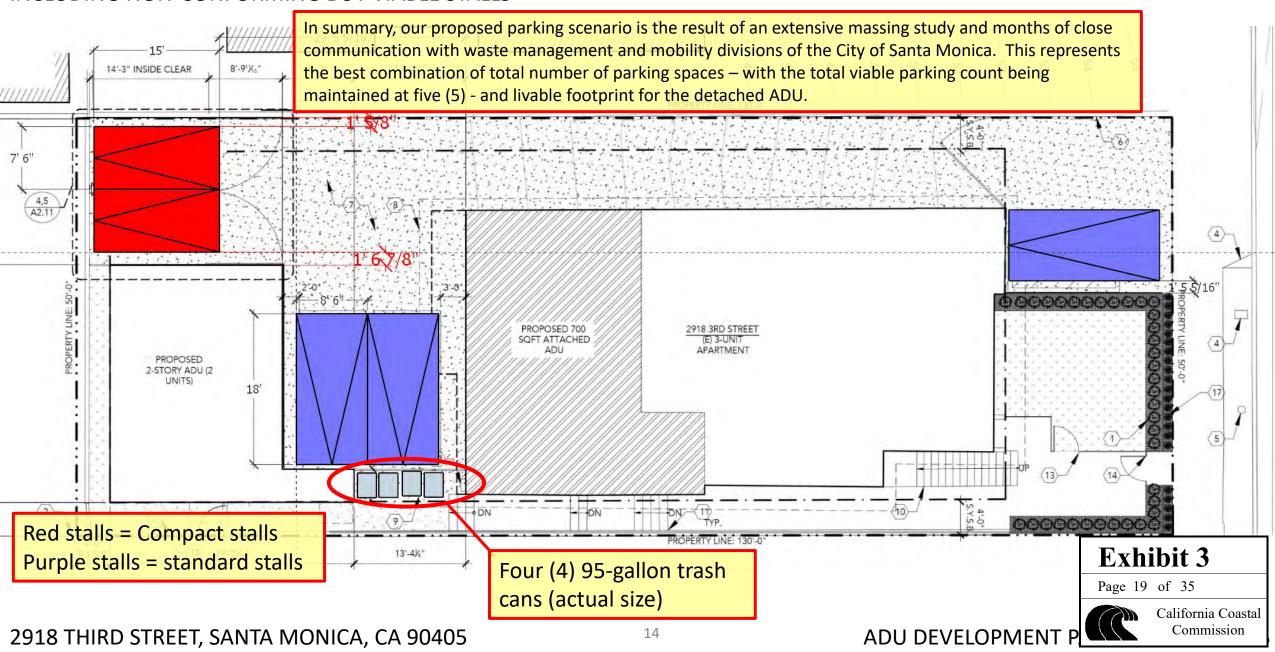








ADU AND PARKING PLAN AS SUBMITTED TO COASTAL – INCLUDING NON-CONFORMING BUT VIABLE STALLS





PARKING STANDARDS

Mobility Division 1685 Main Street, Room 115, PO Box 2200 Santa Monica, CA 90407-2200 Tel: 310/458-8291 transportation.planning@smgov.net

Parking Stall Dimensions (see separate handout for R-1 Single Family)
Standard (S): 8'6" x 18' x 7' (width x length x vertical clear)

Compact (C): 7'6" x 15' x 7'
Accessible: 14" (9"+5") x 18'

Accessible: 14' (9'+5') x 18' x 8'2" Accessible Van: 17' (12'+5') or (9'+8') x 18' x 8'2"

Parallel Parking Stall: 8'6" x 26" x 7" (one) 8'6" x 22" x 7" (multiple)
Loading Space: See SMMC 9.28.080 for additional details

Comer or End Stall: Commercial: (S) 12' (C) 11'
Residential: (S) 11'6" (C) 10'6"
Wall Stall: (S) 8'6"+ 1'6" for each wall and (C) 7'6"+1'6"

Vanpool Stall: 7'2' Vertical Clearance

Bicycle stalls: 2' x 6' x 6' (7' for parking garages)

Wheel Stops

(H) = 36" for standard head-in parking, 30" for compact head-in parking

Striping

4" white stripes for parking and loading spaces. Blue stripes for accessible stalls.

Encroachments Upon Stalls

Wall-Mounted Storage. Cannot encroach more than 316" into the length and must be a minimum 416" off the ground. Includes shelves, racks and cabinets but not ducts or any mechanical, electrical and plumbing equipment.

Columns. A column ≤ 12" wide placed entirely within the non-shaded area (see diagram to right) is permitted without requiring any stall widening.

Rear Setbacks

15' from the centerline of the alley for garages, spaces, ramps, loading zones etc.

Hazardous Visual Obstruction Areas (HVOs)

HVOs provide the driver with a line of sight a minimum of 5 feet along the property and five feet back from the intersection of the property line and the driveway. See Santa Monica Municipal Code (SMMC) section 9,21.180.

Three Maneuvers

Per SMMC Section 9.28.120.8.8, use of a required parking space shall not require more than three vehicle maneuvers. To comply with this requirement, some parking spaces may require additional width and/or aisle space. Notwithstanding the above, for all uses with 20 or more parking spaces, up to 5% of the total number of parking spaces, with a maximum of 10 spaces, may require four turning maneuvers. Such spaces shall be distributed around the parking area(s) on the parcial.

Standard Aisle Widths and Angled Parking Design Dimensions

(A) PARKING ANGLE	WI	B) DTI+ /STAND	DE	C) PTH /STAND	COMP	(D) AISLE 7RESIU	/COMM		(E) NGLE B/			(F) DUBLE B PRESID	
90	7'-6"	8'-6"	15'-0"	18'-0"	20'-0"	22'-0"	25'-0"	35'-0"	40'-0"	43-0"	50'-0"	58'-0"	61'-0"
85	7-7	8'-6"	15-7	18'-8"	19'-0"	21'-0"	24'-0"	34'-7"	39'-8"	42'-8"	50'-2"	58'-4"	61-4"
80	7'-8"	a'-7"	16'-1"	19'-2"	18'-0"	20'-0"	23'-0"	34'-1"	39'-2"	42'-2"	50'-2"	58'-4"	61'-4"
75	7'-9"	8'-10"	16'-5"	19'-7"	17'-0"	19'-0"	22'-0"	33'-5"	38'-7"	41'-7'	49'-10"	58'-2"	61'-2"
70	8'-0"	9'-0"	16'-9"	19'-10"	16'-0"	18'-0"	21'-0"	32'-9"	37'-10"	40'-10"	49'-6"	57'-8"	60'-8"
65	8'-4"	9'-4"	16'-10"	19-11	15'-0"	17'-0"	20'-0"	31'-10"	36-11	39'-11"	48 -8	56'-10"	59'-10"
60	8'-8"	9'-10"	16'-9"	19'-10"	14'-0"	16'-0"	19'-0"	30'-9"	35'-10"	38'-10"	47'-6"	55'-8"	58'-8"
55	9'-1"	10'-4"	16'-7	19'-7"	13'-0"	15'-0"	18'-0"	29'-7"	34'-7"	37'-7"	46'-2"	54'-2"	57'-2"
50	9'-10"	11'-1"	16'-4"	19'-2"	12'-0"	14'-0"	17"-0"	28'-4"	33'-2"	36'-2"	44'-8"	52'-4"	55'-4"
45	10'-7"	12'-0"	15'-11"	18'-8"	11'-0"	13'-0"	16'-0"	26'-11"	31'-8"	34'-8"	42'-10"	50'-4"	53'-4"
40	11'-8"	13'-2"	15'-5"	18'-0"	10'-0"	12'-0"	15'-0"	25'-5'	30'-0"	33'-0"	40'-10"	48'-0"	51"-0"
35	13'-1"	14'-10"	14'-6"	17'-2"	10'-0"	11'-0"	14'-0"	24'-8'	28'-2"	31'-2"	39'-4"	45'-4"	48'-4"
30	15'-3"	17'-0"	14'-0"	16'-2"	10'-0"	10'-0"	13-0"	24'-0"	26'-2"	29'-2"	38'-0"	42'-4"	45'-4"

^{*} The Michality Division may approve a reduced soils when the parting-sall width is widered using a one to three ratio; for example, in some commercial developments, a 30-degree parking space could be widered to 96" (86" +1") with a reduced drive well of 22" (25"-3").

This sheet is only a summary of the City's basic parking requirements. More information on parking design can be found in SMMC chapter 9.26. Offshear Parking Requirements, or by directly calling the Mobility Division.

PERSONAL PROPERTY.

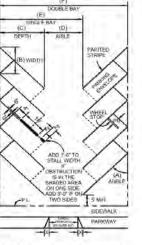
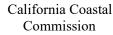


Exhibit 3

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These dimensions may be used only if all spaces in the assistant compact and may be used equally in commercial and residential districts.

APPENDIX – TRASH ENCLOSURE REQUIREMENTS

MONI DECIDENTIAL OR MIVED LICE

Design Standards for On-Site Refuse and Recycling Rooms or Outdoor Enclosures

Per Municipal Code Section 9.21.130

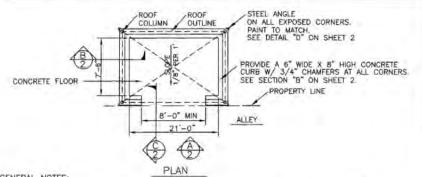
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NON-RESIDENTIAL OR MIXED-USE	REFUSE/RECYCLING DIMENSIONS OR AREAS					
Less than 5,000 sq ft	21' × 7'5" × 10'					
5,001 – 20,000 sq ft	21' × 14' × 10'					
20,001 – 40,000 sq ft	28' × 20' × 10'					
RESIDENTIAL DEVELOPMENT	REFUSE/RECYCLING DIMENSIONS OR AREAS					
Single Family Residence	On private property, screened from public					
3 – 10 Units	21' x 7'5" x 10'					
11 – 20 Units	21' x 14' x 10'					
21 – 40 Units	28' x 20' x 10'					

Large Residential, Nonresidential and Mixed-Use Development: Any development, whether residential, nonresidential, or mixed-use with more than 40 residential units, or with more than 40,000 square feet of floor area shall be reviewed by the Director of Public Works, who shall require the design and placement of a refuse and recycling room or outdoor enclosure consistent with the purpose of this Section to provide adequate and accessible areas for the storage and collection of the refuse and recyclable materials.

Revised 11/24/15

2918 THIRD STREET, SANTA MONICA, CA 90405



GENERAL NOTES:

- 1. THE ENCLOSURE MUST BE LOCATED ADJACENT TO THE THE ALLEY IF AN ADJACENT ALLEY EXISTS, AN ADDITIONAL MONTHLY FEE MAY BE REQUIRED BY THE CITY IF THE ENCLOSURE IS LOCATED MORE THAN 10 FEET FROM THE STREET OR ALLEY OR IF THE ENCLOSURE IS LOCATED IN A SUBTERRAMEN AREA.
- 2. PROVIDE: HOSE BIB WITHIN 20' OF ENCLOSURE LIGHTING (MOTION SENSOR SWITCH) DRAIN (CONNECTED TO SEWER) VENTILATION

PLEASE NOTE: HOSE BIB MUST BE LOCATED OUTSIDE OF THE ENCLOSURE.

- 3. TYPICAL REFUSE BIN SIZE IS 6' W, 4' L, FURNISHED BY THE CITY.
- 4. MATERIALS TO BE USED FOR CONSTRUCTING THE BIN ENCLOSURES INCLUDE SOLID OPAQUE AND IMPACT RESISTANT WALLS. ALL SURFACES MUST BE SPALED WITH AN ANTI-GRAFFITI COATING.
- 5. DOORS TO BE SLIDING OR MOTORIZED ROLL-UP (SEE SHEET 2). INCLUDE 10-KEY ACCESS PAD ON THE OUTSIDE. NO ENCROCHIMENTS INTO THE PUBLIC RIGHT-OF-WAY. TRASH ENCLOSURE, INCLUDING DOORS, SHALL NOT INTERFERE WITH THE 5' × 5' H. VO. TRUANGLE.

- 6. ALL MAINTENANCE INCLUDING BUT NOT LIMITED TO GRAFITTI REMOVAL, CLEANLINESS AND REPLACING BROKEN OR MISSING PLASTIC SLATS SHALL BE THE RESPONS— IN ITY OF THE PROPERTY AWARD
- ALL WORK SHALL BE DONE IN ACCORDANCE WITH CURRENT EDITIONS OF THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION, CALIFORNIA BUILDING CODE, AND THIS DETAIL.
- 6, CONTRACTOR SHALL RESTORE ALL EXISTING CONSTRUCTION THAT IS CUT INTO, ALTERED, DAMAGED OR LEFT UNFINISHED.
- ROOF ENCLOSURES SHALL BE CONSTRUCTED WITH A SOLID ROOF MEETING ARCHITECTURAL & STRUCTURAL DESIGN CRITERIA FROM THE CITY PLANNING AND BUILDING & SAFETY DIVISIONS.
- TRASH ENCLOSURES SHOULD BE ACCESSIBLE FROM INSIDE THE PROPERTY.
- 11. INTERIOR FACE OF WALLS SHALL BE CLEAR OF ANY OBSTRUCTIONS.
- REFUSE AND RECYCLING ENCLOSURE IS FOR THE SOLE PURPOSE OF STORING REFUSE, RECYCLING, AND ORGANIC CONTAINERS PROVIDED BY CITY OF SANTA MONICA.

THIS DESIGN GUIDELINE IS FOR THREE BINS ONLY, PLEASE REFER TO THE NEW DESIGN STANDARD PER SANTA MONICA MUNICIPAL CODE 9.21.130 FOR RESIDENTIAL, NON-RESIDENTIAL, AND MIXED USE DEVELOPMENT.

REVISED 03/06/2018



City of Santa Monica Department of Public Works. 1437 4th Strest, Suite 300 Sonto Monico, CA 90401

1437 4th Street, Suite 300 Sonta Monica, CA 90401 TEL. (310) 458-8721 FAX. (310) 393-4425 e-mail : amengineering@smgov.het

GUIDELINES ON-SITE REFUSE B

SUBMITTED BY : Robert Zok, P.E.

ADU DEVELOPMENT

WED BY : Flook T. Volte. P.E., City Engin

Exhibit 3

Page 21 of 35



California Coastal Commission

^{*}Note: An outdoor enclosure must have walls at least 6' high and an opening at least 8' wide.

APPENDIX - CITY PARKING MAP



Exhibit 3

Page 22 of 35



Bryan Gortikov 2918 3rd Street, LLC 2633 Lincoln Boulevard

March 26, 2021

California Coastal Commission - South Coast Area Office (the "Commission")

301 E Ocean Blvd., Suite 300, Long Beach, CA 90802

Application Number: 5-20-0607

Project Address: 2918 3rd St, Santa Monica, CA 90405

Re: Response to Request for Additional Information – 2918 3rd Street, Santa Monica

Dear Amber & Vince,

Following our conference call on March 23rd at 12:00PM PST, we wish to provide the following additional information and project design updates to assist with your review of the ADU development (the "Project") located at 2918 3rd Street in Santa Monica (the "Subject"). Note that we have expedited our design and response in an effort to address the Commission's requests this week per our discussion. The plans shown in the attached exhibits are conceptual in nature and for illustrative purposes only. We will forward the formal architectural plans once they are complete. Once we have your approval, we will pursue a revision to our Concept Approval from the City of Santa Monica.

Consistency with State ADU Laws

Assembly Bill No. 68 (the "State ADU Law" or "AB68") was approved on October 9, 2019 and went into effect January 1, 2020. Among other things, AB68 (specifically Sec 1.1, which amends Government Code Section 65852.2) requires that local agencies permit the development of both *Attached ADUs* and *Detached ADUs*, which permission shall supersede any restrictions that may exist in local agency's code. The specific provisions are excerpted below::

Sec 1.1(e)(1). Notwithstanding subdivisions (a) to (d), inclusive, a local agency shall ministerially approve an application for a building permit within a residential or mixed-use zone to **create any of the following:**

- (A) [Omitted for brevity refers to single family]
- (B) [Omitted for brevity refers to single family]

(C)

- (i) Multiple accessory dwelling units within portions of existing multifamily dwelling structures that are not used as livable space, including, but not limited to, storage rooms, boiler rooms, passageways, attics, basements, or garages, if each unit complies with state building standards for dwellings.
- (ii) A local agency shall allow **at least one accessory dwelling unit within an existing multifamily dwelling** and shall allow up to 25 percent of the existing multifamily dwelling units.



(D) Not more than two accessory dwelling units that are located on a lot that has an existing multifamily dwelling, but are detached from that multifamily dwelling and are subject to a height limit of 16 feet and four-foot rear yard and side setbacks.

Per the code excerpted above, the State ADU law permits "any of" (as opposed to "only one of") the types of ADUs detailed in Section 1.1(e)(1). Subsection (C) describes "Attached ADUs", which are permitted in number up to 25% of the total unit count but shall be no less than one. Because 2918 3rd Street contains only three units, it qualifies for only one Attached ADU. This ADU is in the location of a former laundry and storage area, which qualifies as "non-livable space" per AB68.

Additionally, Subsection (D) describes "Detached ADUs", which are permitted up to a maximum of two with the condition that they are detached from the multifamily dwelling, are limited to 16' in height, and abide by four-foot rear and side yard setbacks. Note that the City of Santa Monica permits a maximum height of 23 feet in the Subject's "OP2" zoning district. The two proposed Detached ADUs at 2918 3rd Street comply with the applicable restrictions.

Please note that there are additional development standards detailed within the State ADU Law, including but not limited to unit size. In each case, we have carefully reviewed the restrictions and proposed a development that is compliant with the applicable provisions of Santa Monica Municipal Code and the State ADU Laws. The City of Santa Monica has reviewed and indicated its concurrence, as evidenced by its Concept Approval.

Parking Counts

In the time since our last formal response to the Commission, we have come to understand that the Commission would like us to prioritize maximizing legal, conforming spaces as opposed to spaces that are viable but non-conforming. We were also notified that the City Attorney of Santa Monica has advised its planning staff that it can no longer impose the trash enclosure requirements outlined in the Santa Monica Municipal Code on ADU projects within the City; the requirements proved unreasonably difficult to comply with, which is not consistent with the spirit of AB68. This change in messaging from the City is helpful to our ability to maintain as much parking as possible following the Development.

Per our March 23rd conversation, we understand that the Commission is willing to recommend the Subject for approval if we are able to provide at a minimum three legal, conforming parking spaces. Since that conversation, we have spoken with Peter Dzewaltowski, Transportation Planning Associate, City of Santa Monica Mobility Division, and James Combs, Planner, City of Santa Monica Planning Division.

With only a superficial drafting change, our original plans would be approved by the City as providing three legal parking spaces. We would simply remove the markings for the two compact parking spaces in the Northwest corner — each of which is 3" narrower than permissible — and replace them with markings indicating one Standard space with an abundance of spacing on either side as shown on **Exhibit A.** This revised space would comply with Santa Monica's parking standards, and the overall parking count would comply with the Commissions stated minimum parking goal.

However, in an effort to please the Commission we have explored a redesign that would allow us to meet the Commissions "stretch" target of four parking spaces. To accommodate this, the northern wall of the



detached ADU must be moved 18 inches south, creating an additional 18 inches of width for the side-by-side parking spaces in the Northwest corner. This would enable us to park one standard and one compact side-by-side in the Northwest corner, which would equate to a total of four spaces (3:1 standard to compact ratio) overall, as shown on **Exhibit B**. Moving this wall would adversely impact the livability of the interior of the unit. Specifically, it would require us to reduce the already limited existing kitchen counter space and storage by approximately 20%. While it is a secondary concern, it is worth mentioning that Ownership will incur significant cost in implementing this change as it would require material revisions to the existing structural, mechanical, electrical, plumbing, and architectural plans. Note that the City rejected our request to approve a 1:1 standard to compact ratio, which would have required a less significant modification to our plans. The City would consider approving this request subject to our pursuing a minor entitlement (a "Minor Modification Permit"), but this would be time- and cost-prohibitive.

Despite the adverse impacts stated above, if the Commission believes that providing these four spaces is necessary in order to recommend our project for approval, we will proceed with the redesign and seek immediate conceptual approval from the City of a revised site layout with four legal parking spaces.

Given the timing constraints of our Coastal Development Permit approval deadline, we would appreciate your prompt feedback. I am available by phone at (818) 613-7960 or via email at bg@gortikovinc.com

Kind regards,

Bryan Gortikov



EXHIBIT A - THREE STANDARD PARKING SPACES - NO CHANGE REQUIRED TO PLANS

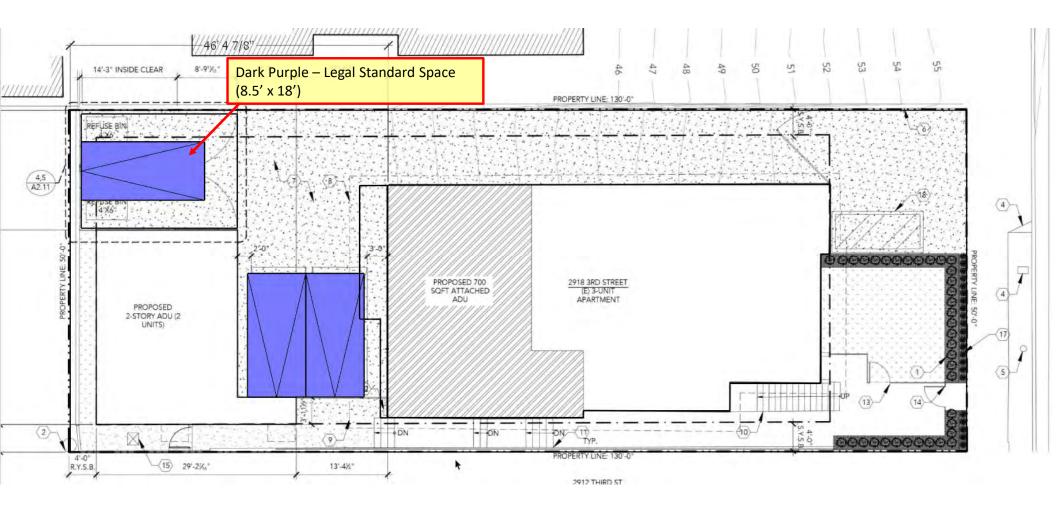
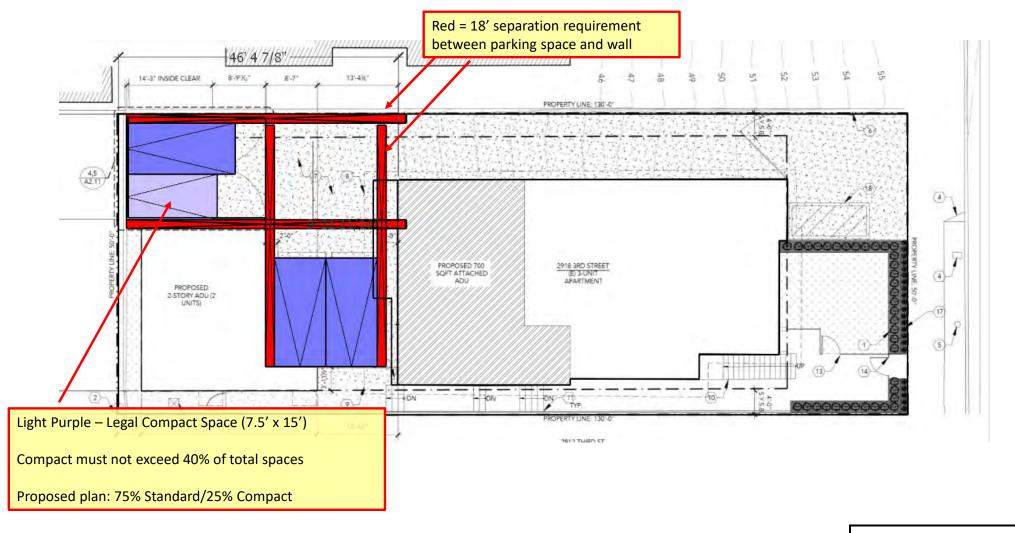




EXHIBIT B – FOUR PARKING SPACES (3:1) – CHANGE REQUIRED





Page 27 of 35



EXHIBIT B – FOUR PARKING SPACES (3:1) – CHANGE REQUIRED

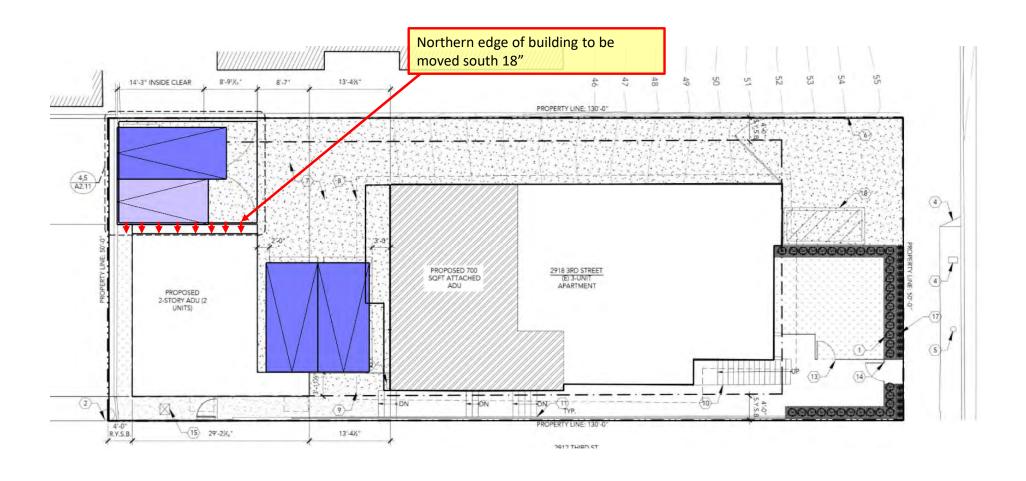
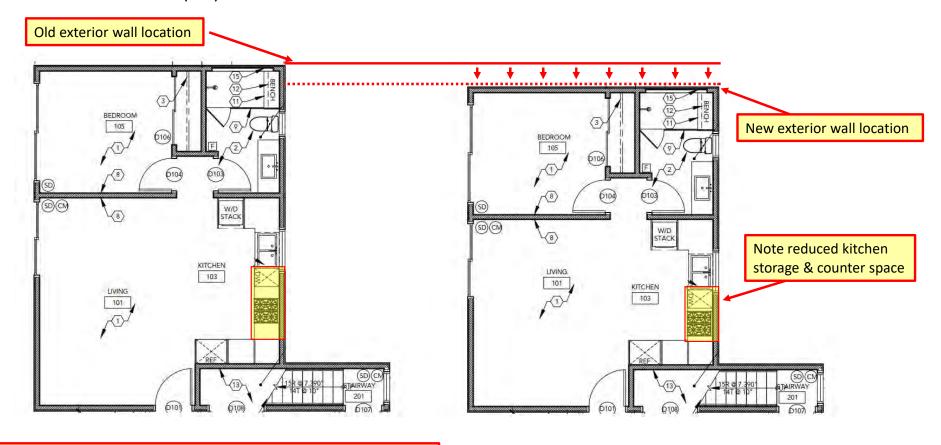




EXHIBIT B - FOUR PARKING SPACES (3:1) - CHANGE REQUIRED

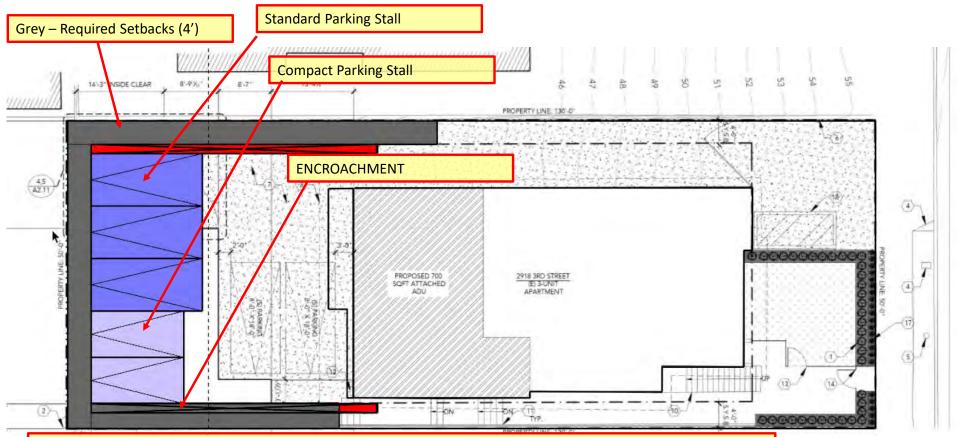


Interior of detached ADU is shown here to illustrate the consequence of moving the exterior wall. We will lose 18" along the north-south dimension in each of the two ADUs. The bedrooms and bathrooms are already sized as small as they can be. The length will be eliminated from the kitchen, which eliminates most of the counter and storage space.



2918 3RD STREET PARKING ANALYSIS – SCENARIO 1 - DEMOLISH CARPORT, REBUILD NEW

APRIL 20 2021

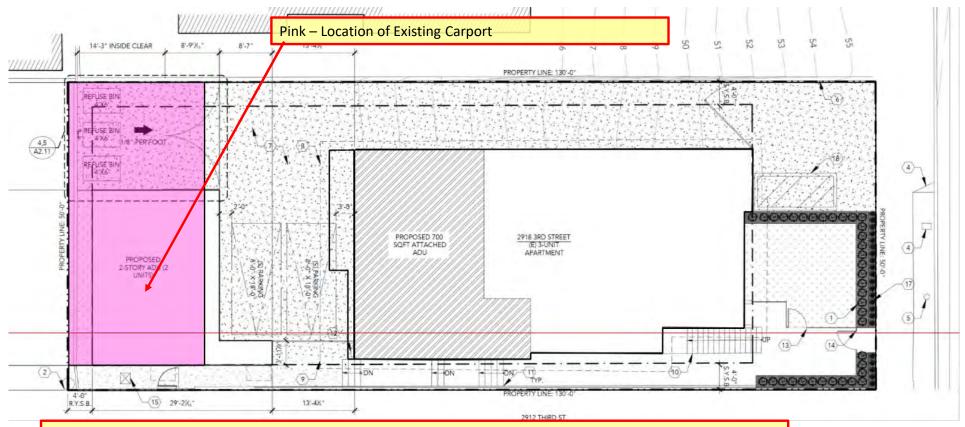


This diagram illustrates the first floor parking layout in the event we demolished the existing parking structure. Based on city required ratios we must have no more than 40% compact, meaning 3 standard and 2 compact. Any new structure must be setback 4' from north, south and west property lines. 18" spacing is required between parking spaces and walls. As you can see, the required spacing encroaches on the required setback. This is not viable.

Exhibit 3

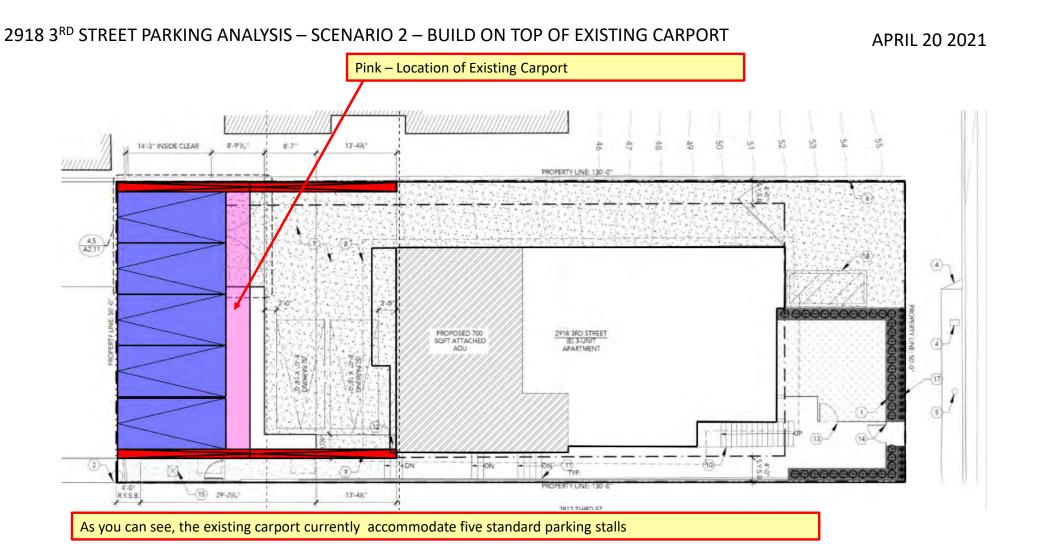
Page 30 of 35

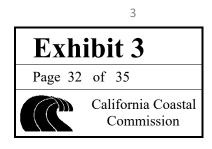




In order to accommodate the width of five parking stalls, we must keep the existing carport unmodified. A second story may be constructed, but no portion of the second story may exist within the setbacks (4' from any side), and be a minimum of 10' from the existing building.

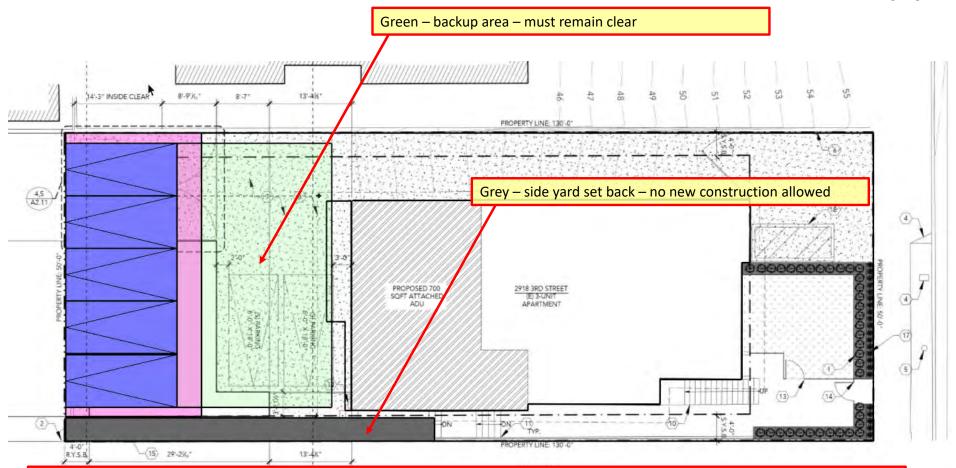






2918 3RD STREET PARKING ANALYSIS – SCENARIO 2 – BUILD ON TOP OF EXISTING CARPORT

APRIL 20 2021

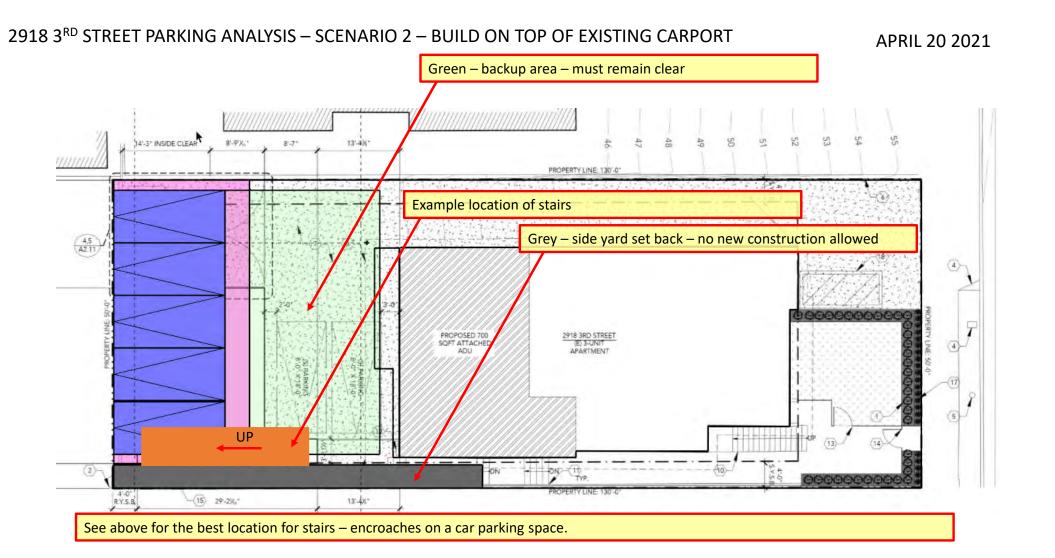


The problem with this layout is that we need to build stairs to access the upper floor. We cannot build these stairs in the side yard setback (grey area above) – we have confirmed this with the city. The only available place to build the stairs would be *behind* the car parking, which would block the backup path for at least one car. If the backup path is blocked, the City would not acknowledge it as a legal space, which would reduce our legal parking count back down to 4 spaces – which is what we already have.

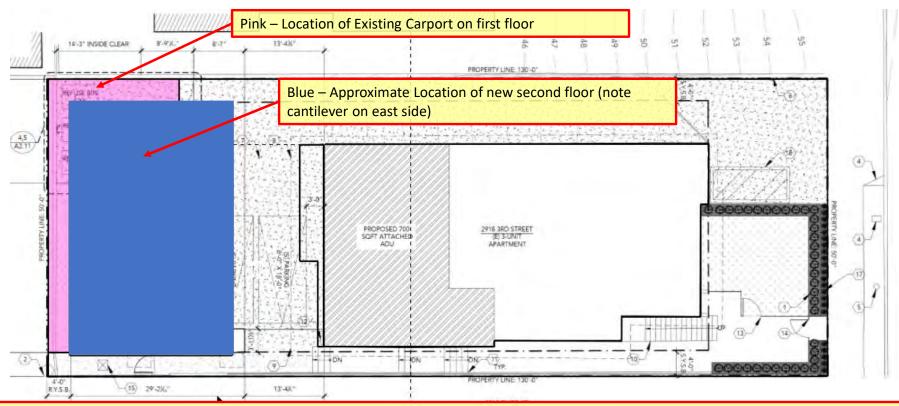
Exhibit 3

Page 33 of 35







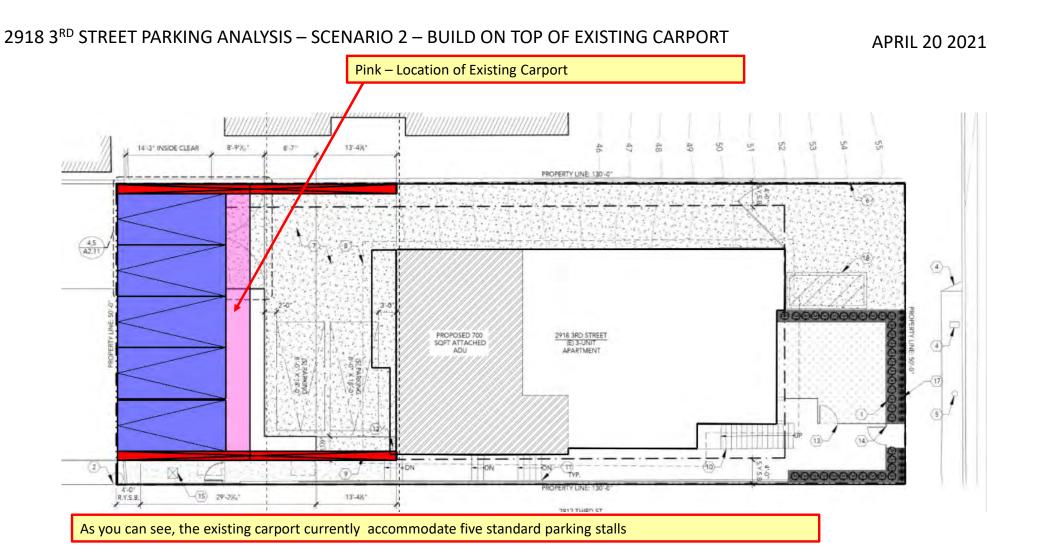


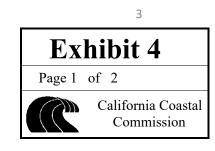
Although the location of the stairs makes this second floor only location non-viable, it is worth mentioning certain secondary issues. The second story would need to cantilever more than 8' off of the eastern end of the carport in order to create a livable space (550 SF per unit) on the second floor. This adds considerable structural cost. Additionally, with the first floor being parking only we would be designing a "soft-story condition" which is a major seismic risk. To mitigate this, we would need to incorporate additional structural members to add shear strength – grade beams, moment frames, etc. We have discussed this with our contractor, who specializes in earthquake retrofits. He believes these factors could add \$50,000 or more to the budget of the building. Combined with the reduced livable square footage (and lower associated market rent), even after adding back in the value of creating an additional parking space this would materially impact the financial viability of the development.

Exhibit 3

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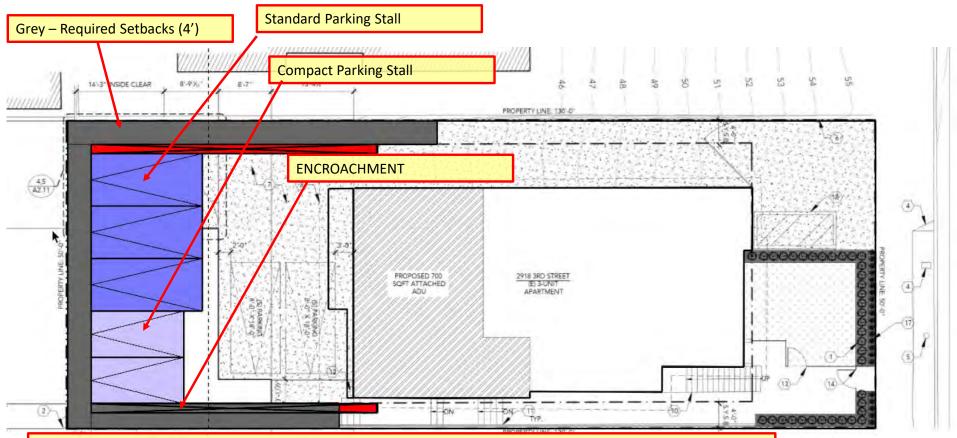






2918 3RD STREET PARKING ANALYSIS – SCENARIO 1 - DEMOLISH CARPORT, REBUILD NEW

APRIL 20 2021



This diagram illustrates the first floor parking layout in the event we demolished the existing parking structure. Based on city required ratios we must have no more than 40% compact, meaning 3 standard and 2 compact. Any new structure must be setback 4' from north, south and west property lines. 18" spacing is required between parking spaces and walls. As you can see, the required spacing encroaches on the required setback. This is not viable.

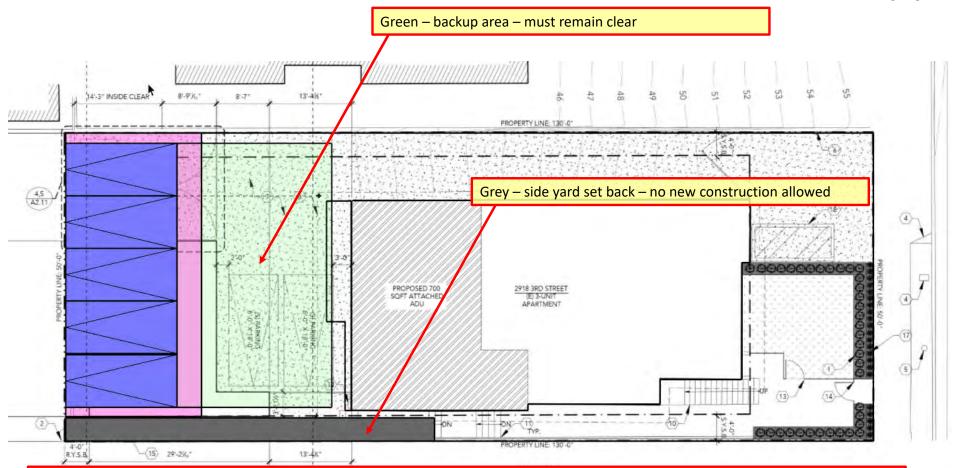
Exhibit 4

Page 2 of 2



2918 3RD STREET PARKING ANALYSIS – SCENARIO 2 – BUILD ON TOP OF EXISTING CARPORT

APRIL 20 2021

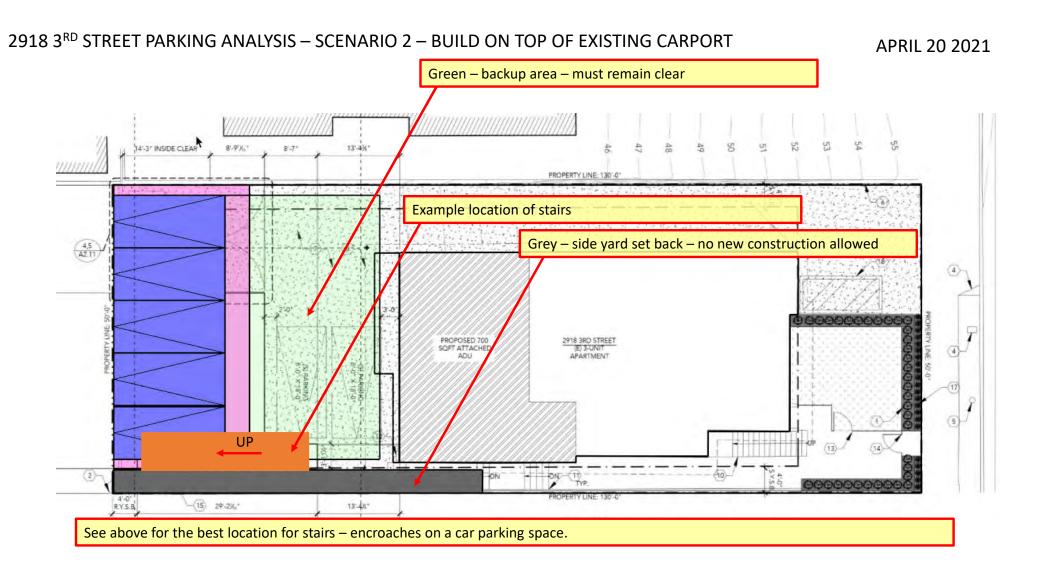


The problem with this layout is that we need to build stairs to access the upper floor. We cannot build these stairs in the side yard setback (grey area above) – we have confirmed this with the city. The only available place to build the stairs would be *behind* the car parking, which would block the backup path for at least one car. If the backup path is blocked, the City would not acknowledge it as a legal space, which would reduce our legal parking count back down to 4 spaces – which is what we already have.

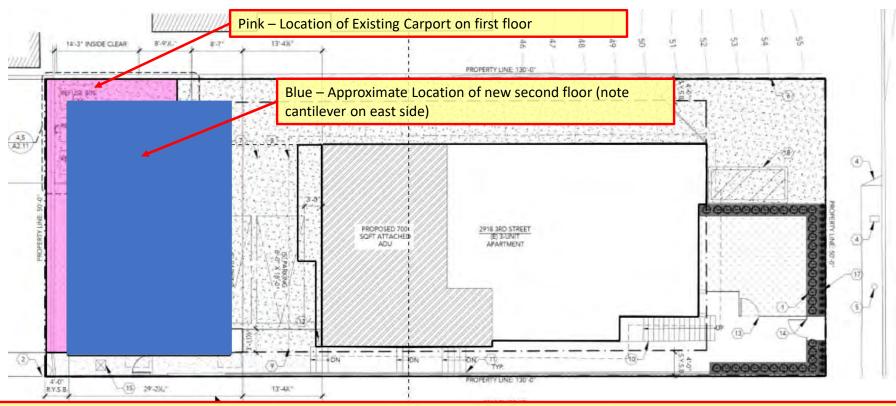
Exhibit 5

Page 1 of 3







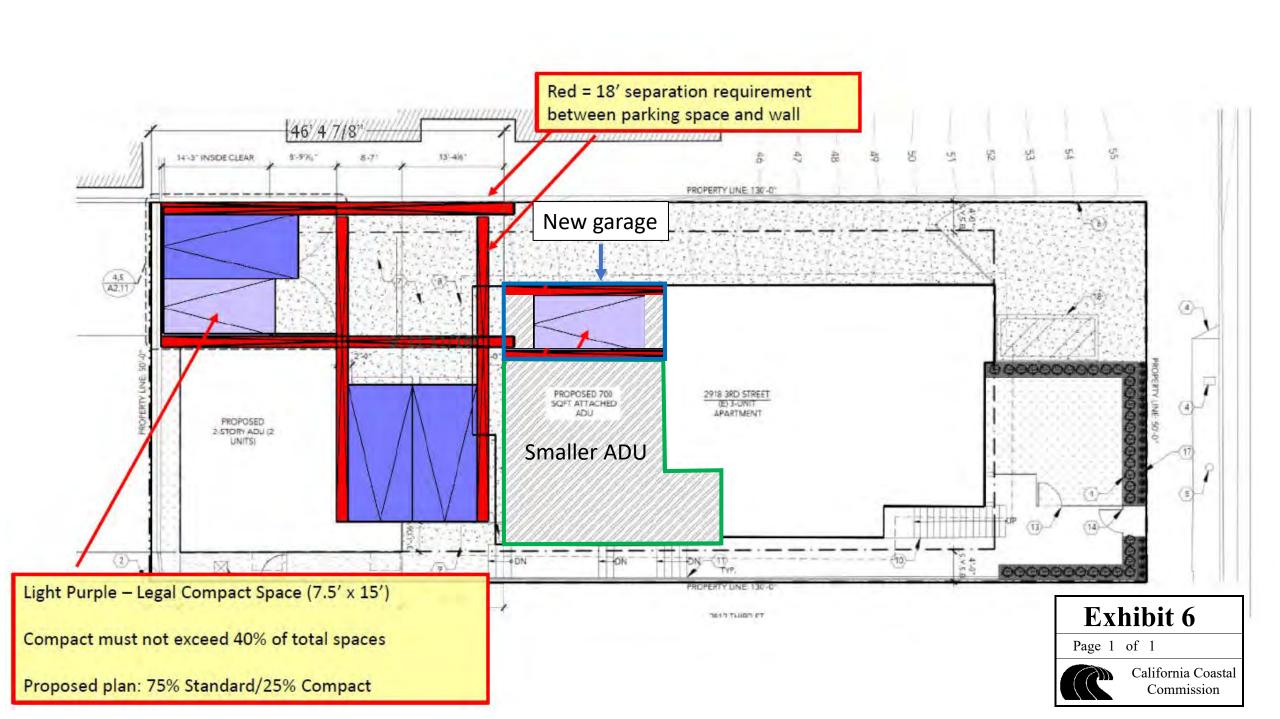


Although the location of the stairs makes this second floor only location non-viable, it is worth mentioning certain secondary issues. The second story would need to cantilever more than 8' off of the eastern end of the carport in order to create a livable space (550 SF per unit) on the second floor. This adds considerable structural cost. Additionally, with the first floor being parking only we would be designing a "soft-story condition" which is a major seismic risk. To mitigate this, we would need to incorporate additional structural members to add shear strength – grade beams, moment frames, etc. We have discussed this with our contractor, who specializes in earthquake retrofits. He believes these factors could add \$50,000 or more to the budget of the building. Combined with the reduced livable square footage (and lower associated market rent), even after adding back in the value of creating an additional parking space this would materially impact the financial viability of the development.

Exhibit 5

Page 3 of 3





CALIFORNIA COASTAL COMMISSION SOUTH COAST REGIONAL COMMISSION 666 E. OCEAN BOULEYARD, SUITE 3107 P.O. BOX 1450

LONG BEACH, CALIFORNIA 90801 (213) 590-5071 (714) 846-0648

COASTAL DEVELOPMENT PERMIT

1
and a

Application Number:	P-3-20-78-2978
	Livio De Rossi
	3115 - 6th Street, Santa Monica, CA 90405
X Star	rgency ndard nistrative
Development Location: _	2918 Third Street, Santa Monica, CA
Development Description	Demolition of existing single-family dwelling
and construct a three	e-unit apartment building, 24 feet above centerlin
of frontage road , s	ix on-site parking spaces with conditions.
I. The proposed develop pursuant to the Cal	oment is subject to the following conditions impose Ifornia Coastal Act of 1976:
See attached Page 3	for conditions.
	Exhibit 7
Condition/s Met On	By Page 1 of 3

The South Coast Commission finds that: Α. The proposed development, or as conditioned: The developments are in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976 and will not prejudice the ability of the local government to prepare a local coastal program that is in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976. If located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976. 3. There are no feasible alternatives, or feasible mitigation measures, as provided in the California Environmental Quality Act. available for imposition by this Commission under the power granted to it which would substantially lessen any significant adverse impact that the development, as finally proposed may have on the environment. III. Whereas, at a public hearing, held on June 5, 1978 at Torrance by a _ 7 to _ 0 vote permit application number P-3-20-78-2978 is approved. This permit may not be assigned to another person except as provided in Section 13170, Coastal Commission Rules and Regulations. This permit shall not become effective until a COPY of this permit has V. been returned to the Regional Commission, upon which copy all permittees or agent(s) authorized in the permit application have acknowledged that they have received a copy of the permit and have accepted its contents. VI. Work authorized by this permit must commence within two years from the date of the Regional Commission vote upon the application. Any extension of time of said commencement date must be applied for prior to expiration of the permit. VII. Issued on behalf of the South Coast Regional Commission on July 18, 197 8 M. J. Carpenter Executive Director

receipt of Permit Number P-3-20-78-2978

contents.

_____, permittee/agent, hereby acknowledge

3-20-78-2978 and have accepted its

Exhibit 7

Page 2 of 3

signat (



Conditions for P-78-2978

Prior to issuance of permit, applicant shall submit:

- 1. a deed restriction for recording limiting the use of the structure to three rental units only, and
- 2. evidence that public notice has been placed in a newspaper of general circulation, such as the Evening Outlook for a period of ten (10) working days; such notice will describe the structure and announce the availability of a structure for removal and relocation; the availability period will commence the day of the first notice and last 60-consecutive calendar days thereafter and shall be stated as such in the public notice, if after the 60th day there are no requests for relocation the permit will be issued (providing all other conditions are satisfied) allowing demolition and construction of the approved project; if relocation occurs prior to expiration of the 60-day period, evidence shall be supplied to verify that fact and the permit can be issued (providing other conditions are met).

* * *



Page 3 of 3

