

**CALIFORNIA COASTAL COMMISSION**

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# Th9a

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## STAFF REPORT: APPEAL – NO SUBSTANTIAL ISSUE

**Appeal Number:** A-5-VEN-22-0032

**Applicant:** Ilan Kenig (109 Catamaran Marina LLC & 111 Catamaran Marina LLC)

**Agent:** Jeffrey T. Harlan

**Local Government:** City of Los Angeles

**Local Decision:** Approval with Conditions

**Appellant:** Citizens Preserving Venice (Represented by Robin Rudisill)

**Project Location:** 109, 109 ½, and 111 Catamaran Street, Venice, City of Los Angeles, Los Angeles County (APN: 4225-004-080)

**Project Description:** Appeal of City of Los Angeles Local Coastal Development Permit No. DIR-2017-3121-CDP-SPP-MEL approved with conditions to demolish two single-family homes and duplex on two adjacent lots (totaling 5,060 sq. ft.), merge and re-subdivide lots into four new small lots (1,412 sq. ft., 1,173 sq. ft., 1,173 sq. ft., and 1,174 sq. ft.), and construct four new three-story single-family homes (2,002 sq. ft., 1,915 sq. ft., 1,915 sq. ft., and 1,854 sq. ft.), one on each new lot, with roof decks and attached garages providing a total of nine parking spaces across the four new lots.

**Staff Recommendation:** No Substantial Issue

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**IMPORTANT HEARING PROCEDURE NOTE:** This is the “substantial issue” phase of the appeal hearing. Testimony will be taken only on the question of whether the appeal raises a substantial issue. Generally, and at the discretion of the Chair, testimony is limited to 3 minutes total per side. Please plan your testimony accordingly. Only the applicant, appellant(s), persons who opposed the application before the local government (or their representatives), and the local government shall be qualified to testify. Others may submit comments in writing. If the Commission determines that the appeal does raise a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

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## SUMMARY OF STAFF RECOMMENDATION

The action by the City of Los Angeles on Local Coastal Development Permit (CDP) No. DIR-2017-3121-CDP-SPP-MEL approved the demolition of two single-family residences and a duplex located on two adjacent lots that total 5,060 sq. ft. in net area, the merger and re-subdivision of said lots into four new small lots (measuring 1,412 sq. ft., 1,173 sq. ft., 1,173 sq. ft., and 1,174 sq. ft., respectively), and the construction of four new three-story single-family homes (2,002 sq. ft., 1,915 sq. ft., 1,915 sq. ft., and 1,854 sq. ft.) with roof decks on the subdivided lots. A total of nine parking spaces will be provided in four individual garages attached to each of the single-family residences, with direct vehicle access to the westerly (unnamed) side alley bordering Catamaran Street.

The project site is located in the Marina Peninsula subarea of Venice within the City of Los Angeles Single Permit and Dual Permit Jurisdiction Areas. The standard of review for this appeal is Chapter 3 of the Coastal Act, with the certified Venice Land Use Plan (LUP) serving as guidance.

No local appeal was filed within the City’s local appeal period. The City’s Notice of Final Local Action (NOFA) was received by the Commission’s South Coast office on June 3, 2022, and the Commission’s twenty working-day appeal period was established. During the Commission’s appeal period, one appeal prepared by Robin Rudisill, representing Citizens Preserving Venice, was filed on July 1, 2022. The appellant generally contends that: **1)** the project is not visually compatible with the mass, scale, and character of the surrounding neighborhood, including yard and permeable land area requirements; **2)** the proposed project would result in a loss of residential density and would not preserve overall density in an area able to accommodate it; **3)** subdivision of lots and conversion of multi-family housing to single-family housing subverts neighborhood character and does not conform with the multi-family land use designation; **4)** the proposed project will result in adverse cumulative impacts on community character; **5)** the Coastal Act’s affordable housing provisions and the Commission’s Environmental Justice Policy were not considered; **6)** protection of Venice as a Special Coastal Community was not considered, and; **7)** the City erred in its determination that the proposed project and other similar cases of small lot subdivisions are exempt under CEQA.

In terms of the contention that the project is not compatible with the community character and visual appearance of the surrounding neighborhood, the City found that in an analysis

of 18 structures between Buccaneer Street and Catamaran Street, the proposed development would conform with the character of surrounding development, as well as development standards in the certified LUP, namely Policies I.A.1, I.A.5, I.A.7, I.E.1, I.E.2, I.E.3 and II.A.3 ([Exhibit 7](#)). The Commission staff's community character and cumulative effects survey of 12 developed lots along both sides of Catamaran Street between Pacific Avenue and Strongs Drive ([Exhibit 7](#))<sup>1</sup> also determined that the proposed development is consistent with the surrounding character of development, including the average structural size (of 6,931 sq. ft.), average residential density (of 5 units per lot), and average height (of 25 ft., including three neighboring buildings that are at least 35 ft. tall). Staff analysis corroborates that the proposed development would meet the required permitted uses, density, setback, and height standards in visual compatibility with the surrounding area and in conformance of the land use designation of the LUP and Chapter 3 of the Coastal Act. The proposed single-family residences are replacing two existing single-family residences onsite, and are an allowable use in the Multi-Family Residential – Low Medium II Density designation of the site. The proposed lot merger and re-subdivision are not anticipated to affect the multi-family residential character of the neighborhood, and the project design ensures visual compatibility with the surrounding area.

The subject development would cover the majority of the project site and proposes limited yard area. No yard area is proposed adjacent to the northern unnamed alley, and yard area on the other three sides of the site range from approximately 250 sq. ft. to 540 sq. ft. While the proposed yard space for the subject site is lacking in terms of open space, permeable land area for on-site percolation of stormwater, and on-site recreation, yard space is consistent with the existing scale and character of the neighborhood.

The City provided supporting evidence, including building permits, certificates of occupancy, and housing cost data (as part of the Mello Act Determination), which demonstrated that the proposed project would not result in loss of affordable units at the site. Although an unpermitted fifth unit previously existing at the site which was subsequently removed, the site's certificates of occupancy clarify that only four legal units are permitted and currently exist on the subject site ([Exhibit 6](#)).

In 2019, the Commission adopted an environmental justice policy to inform its implementation of Section 30604(h) as the Coastal Act, which gives the Commission the authority to consider environmental justice when acting on a CDP. The Commission recognizes that housing along the California coastline has been influenced by discriminatory housing policies and practices and has affected present day demographics in the coastal zone. However, as described above, the proposed project would not result in the loss of density or affordable rental units at the site. Thus, contentions related to the affordable housing provisions of the Coastal Act and the Commission's Environmental Justice Policy do not raise a substantial issue. For these same reasons, the contention that

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<sup>1</sup> Commission staff chose a different survey area than the City in order to remain consistent with past recent Venice projects reviewed by the Commission where the survey area generally included the homes on either side of the primary street, which is Catamaran Street for the subject project. However, the proposed home alignment will front the adjacent western unnamed alley. Thus, the City's survey area was also reasonable and consistent with past Commission action.

to the project would adversely impact the special coastal community status of Venice, protected under Coastal Act Section 30253(e) also does not raise a substantial issue.

Finally, the appellant contends that the City erroneously exempted the project from the California Environmental Quality Act (CEQA) requirements for the preparation of an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND). The appellant also cites the CEQA requirements pertaining to projects approved under the Small Lot Subdivision Ordinance. As directed in Coastal Act Sections 30604 and 30625, compliance with CEQA is not grounds for an appeal. Thus, the appellant's contention that the City erred in its CEQA determination does not raise substantial issue with regard to the project's conformity with the Chapter 3 policies of the Coastal Act

Thus, considering the factors for substantial issue in Section 13115(b) of the Commission's regulations, the appeal does not raise a substantial issue regarding the City-approved development's consistency with Chapter 3 policies of the Coastal Act with respect to the grounds of the appeal, using the certified LUP for Venice as guidance, including with respect to compatibility with community character and potential prejudice to the City's adoption of an LCP that conforms with Chapter 3.

Staff recommends that the Commission determine that **no substantial issue exists** with respect to the grounds on which the appeal has been filed. The motion and resolution to carry out the staff recommendation is on Page 6.

**TABLE OF CONTENTS**

**I. MOTION AND RESOLUTION – SUBSTANTIAL ISSUE .....6**  
**II. APPELLANT’S CONTENTIONS .....6**  
**III. LOCAL GOVERNMENT ACTION.....6**  
**IV. APPEAL PROCEDURES .....7**  
**V. SINGLE/DUAL PERMIT JURISDICTION AREAS.....8**  
**VI. FINDINGS AND DECLARATIONS – SUBSTANTIAL ISSUE .....9**  
    A. PROJECT DESCRIPTION AND LOCATION..... 9  
    B. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS ..... 10  
    C. SUBSTANTIAL ISSUE ANALYSIS ..... 10

**APPENDIX A – SUBSTANTIVE FILE DOCUMENTS .....22**  
**APPENDIX B – NEIGHBORHOOD SURVEY TABLES .....23**

**EXHIBITS**

- [Exhibit 1 – Vicinity Map](#)
- [Exhibit 2 – City Approved Plans](#)
- [Exhibit 3 – City Determination Letter](#)
- [Exhibit 4 – Appeal](#)
- [Exhibit 5 – Mello Act Determinations](#)
- [Exhibit 6 – Building Records and Certificates of Occupancy](#)
- [Exhibit 7 – City and Commission Neighborhood Survey Areas](#)
- [Exhibit 8 – Small Lot Subdivision Ordinance](#)

## I. MOTION AND RESOLUTION – SUBSTANTIAL ISSUE

**Motion:** I move that the Commission determine that Appeal No. A-5-VEN-22-0032 raises **NO SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act.

Staff recommends a **YES** vote. Passage of this motion will result in a finding of No Substantial Issue and adoption of the following resolution and findings. If the Commission finds No Substantial Issue, the Commission will not hear the application de novo and the local action will become final and effective. The motion passes only by an affirmative vote by a majority of the Commissioners present.

**Resolution:** The Commission hereby finds that Appeal No. A-5-VEN-22-0032 presents **NO SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act regarding consistency with Chapter 3 policies of the Coastal Act.

## II. APPELLANT’S CONTENTIONS

On July 1, 2022, within 20-working days of receipt of notice of final local action, an appeal was filed by Robin Rudisill, representing Citizens Preserving Venice ([Exhibit 4](#)). The appellant generally raises the following concerns with the City-approved development:

- 1) The project is not visually compatible with the mass, scale, and character of the surrounding neighborhood, including yard and permeable land area requirements.
- 2) The project would result in a loss of residential density and would not preserve overall density in an area able to accommodate it.
- 3) Subdivision of lots and conversion of multi-family housing to single-family housing subverts neighborhood character and does not conform with the multi-family land use designation.
- 4) The proposed project will result in adverse cumulative impact on community character.
- 5) The Coastal Act’s affordable housing provisions and the Commission’s Environmental Justice Policy were not considered.
- 6) Protection of Venice as a Special Coastal Community was not considered.
- 7) The City erred in its determination that the proposed project and other similar cases of small lot subdivisions are exempt under CEQA.

## III. LOCAL GOVERNMENT ACTION

The City held a public hearing for the local CDP on November 10, 2021. The owner, representatives, and six members of the public attended the public hearing. Prior to the

hearing, two comment letters were received. On November 10, 2021, Melissa French sent an email regarding concerns of vehicle congestion on Pacific Avenue. French stated that the area was already saturated with beachgoers looking for free parking and requested the street parking be converted to a resident permit parking system. On November 10, 2021, Jim Fitzgerald sent an email stating that car parking overlapping in the alley cause issues with garbage trucks. Fitzgerald also stated that the northerly lot may have issues with the existing power lines.

On May 6, 2022, the City of Los Angeles Director of Planning approved the project under Case No. DIR-2017-3121-CDP-SPP-MEL ([Exhibit 3](#)). The local CDP approved the demolition of two existing single-family dwellings and a duplex, the merger and re-subdivision of two lots with a total of 5,060 square feet into four new small lots, and the construction of four new three-story single-family dwellings with roof decks and attached garages with a total of nine parking spaces.

No appeals were received by the West Los Angeles Area Planning Commission (WLAAPC). On June 3, 2022, the Commission's South Coast District Office received the City's Notice of Final Action (NOFA) on DIR-2017-3121-CDP-SPP-MEL and opened the Commission's 20 working-day appeal period. On July 1, 2022, the appellant filed a timely appeal ([Exhibit 4](#)). No other appeals were received prior to the end of the Commission's appeal period on July 1, 2022.

#### **IV. APPEAL PROCEDURES**

Section 30600(b) of the Coastal Act provides that prior to certification of its Local Coastal Program (LCP), a local jurisdiction may, with respect to development within its area of jurisdiction in the coastal zone and consistent with the provisions of Coastal Act sections 30604, 30620 and 30620.5, establish procedures for the filing, processing, review, modification, approval or denial of a CDP. Pursuant to this provision, the City of Los Angeles developed a permit program in 1978 to exercise its option to issue local CDPs. Sections 13301-13325 of Title 14 of the California Code of Regulations provide procedures for issuance and appeals of locally issued CDPs. Section 30602 of the Coastal Act allows any action by a local government on a CDP application evaluated under Section 30600(b) to be appealed to the Commission. The standard of review for such an appeal is Chapter 3 of the Coastal Act. [Cal. Pub. Res. Code § 30200 and 30604.]

After final local action on a CDP application, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice, which contains all the required information, a twenty working-day appeal period begins, during which any person, including the applicants, the Executive Director, or any two members of the Commission, may appeal the local decision to the Coastal Commission. [Cal. Pub. Res. Code § 30602] As provided under Section 13318 of Title 14 of the California Code of Regulations, the appeal must contain the information required by Section 13111 of Title 14 of the California Code of Regulations, including the specific grounds for appeal and a summary of the significant question raised by the appeal.

The action currently before the Commission is to find whether there is a “substantial issue”

or “no substantial issue” raised by the appeal of the local approval of the proposed project. Sections 30621 and 30625(b)(1) of the Coastal Act, and Section 13321 of the Commission’s regulations, require a de novo review of the appealed project unless the Commission determines that no substantial issue exists as to the proposed project’s conformity with Chapter 3 of the Coastal Act.

Commission staff recommends a finding of **no substantial issue**. If the Commission decides that the appellant’s contentions raise no substantial issue as to conformity with Chapter 3 of the Coastal Act, the action of the local government becomes final. Alternatively, if the Commission finds that a substantial issue exists with respect to the conformity of the action of the local government with the Chapter 3 policies of the Coastal Act, the Commission typically continues the public hearing to a later date in order to review the CDP as a de novo matter. [Cal. Pub. Res. Code §§ 30621 and 30625.] Section 13321 of the Coastal Commission regulations specifies that de novo actions will be heard according to the procedures outlined in Sections 13114 and 13057-13096 of the Commission’s regulations.

If there is no motion from the Commission to find no substantial issue, it will be presumed that the appeal raises a substantial issue, and the Commission will schedule the de novo phase of the public hearing on the merits of the application at a future Commission hearing. A de novo public hearing on the merits of the application uses the Chapter 3 policies of the Coastal Act. The Venice LUP, certified on June 14, 2001, is used as guidance. Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

Those who are qualified to provide spoken testimony at the substantial issue phase of the hearing as provided by Section 13117 of Title 14 of the California Code of Regulation, will typically have three minutes per side to address whether the appeal raises a substantial issue. The only persons qualified to testify before the Commission at the substantial issue portion of the appeal process are the applicants, appellants, persons who opposed the application before the local government, and the local government. Testimony from other persons must be submitted in writing. The Commission will then vote on the substantial issue matter. It takes a majority of Commissioners present to find that the grounds for the appeal raise no substantial issue.

## **V. SINGLE/DUAL PERMIT JURISDICTION AREAS**

Within the areas specified in Coastal Act Section 30601, which is known in the City of Los Angeles permit program as the Dual Permit Jurisdiction area, the Coastal Act requires that any development which receives a local CDP permit also obtain a second (or “dual”) CDP from the Coastal Commission. The Commission’s standard of review for the proposed development in the Dual Permit Jurisdiction area are the Chapter 3 policies of the Coastal Act. For projects identified in Section 30601 (i.e., projects in the Single Permit Jurisdiction), the City of Los Angeles local CDP is the only CDP required. Portions of the subject site are located within the Single Permit Jurisdiction Area, and the remainder is located within the Dual Permit Jurisdiction Area. Therefore, the applicants are required to obtain a second, or



“dual”, CDP from the Commission for the proposed development. An application for the dual CDP has not yet been submitted.

## **VI. FINDINGS AND DECLARATIONS – SUBSTANTIAL ISSUE**

### **A. PROJECT DESCRIPTION AND LOCATION**

The project site is located approximately 600 ft. inland of the beach, and less than 300 ft. to the west of Grand Canal, bordered primarily by multi-family residential development in the Marina Peninsula subarea of Venice, City of Los Angeles ([Exhibit 1](#)). The two subject lots are designated Multifamily Residential – Low Medium II by the certified Venice LUP and R3-1 by the City of Los Angeles uncertified Zoning Code. The long, narrow lots are side-by-side and located at the end of a block surrounded on three sides by Catamaran Street and two alleyways. Vehicular access to the site is currently obtained from the two alleys in the rear (north) and side (west), as well as Catamaran Street on the south, which is a narrow, alley-like roadway that becomes a walk-street immediately due west of the site but is not a walk-street at this site. The existing site is 5,430 sq. ft., but proposed street dedications will reduce the overall parcel size to a net area of 5,060 sq. ft. The City did not find any of the existing units to be affordable. Although an unpermitted fifth unit previously existing at the site which was subsequently removed, the site’s certificates of occupancy clarify that only four legal units are permitted and currently exist on the subject site ([Exhibit 6](#)).

The scope of work approved by the City includes the demolition of two single-family residences (782 sq. ft. and 936 sq. ft.) and a 1,439 sq. ft. duplex on two lots, merger and re-subdivision of the lots into four new small lots (1,412 sq. ft., 1,173 sq. ft., 1,173 sq. ft., and 1,174 sq. ft.), and construction of four new three-story single-family homes (2,002 sq. ft., 1,915 sq. ft., 1,915 sq. ft., and 1,854 sq. ft.) with roof decks and attached garages providing a total of nine parking spaces across the site ([Exhibit 2](#)).

The nine onsite parking spaces for the four new residences would be located on the rear of each lot and accessed through the westerly unnamed alley. The four new homes would be 35 ft. in height. For the lot fronting Catamaran Street, the southwest side yard setback will be 4 ft. 2 in. (excluding the 2-ft. street dedication). The applicant proposes approximately 8 inches of separation between each of the single-family residences. Currently, there is approximately a 3-ft. separation between the structures of each lot. Additionally, the applicant proposes approximately 7 ft. 10 in. for the rear yard setback (excluding a 2 ft. 5 in.-wide street dedication) along the western unnamed alley parallel to Pacific Avenue. The City-approved project observes all setbacks, parking, and height requirements of the City of Los Angeles uncertified Zoning Code. The proposed project is subject to the Small Lot Subdivision Ordinance ([Exhibit 8](#)), which allows for reduced setbacks on small lots. The Venice LUP does not include setback requirements for the site.

## **B. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS**

When determining whether an appeal raises a “substantial issue,” Section 13115(c) of the Commission’s regulations provide that the Commission may consider factors, including but not limited to:

1. The degree of factual and legal support for the local government’s decision;
2. The extent and scope of the development as approved or denied by the local government;
3. The significance of the coastal resources affected by the decision;
4. The precedential value of the local government’s decision for future interpretations of its LCP; and
5. Whether the appeal raises local issues, or those of regional or statewide significance.

The Commission may, but need not, assign a particular weight to a factor.

Staff recommends that the Commission find that **no substantial issue exists** with respect to whether the local government action conforms to the provisions of Chapter 3 of the Coastal Act for the reasons set forth below.

## **C. SUBSTANTIAL ISSUE ANALYSIS**

As stated in Section IV of this report, the grounds for an appeal of a CDP issued by the local government prior to certification of its LCP are the Chapter 3 policies of the Coastal Act. Any local government CDP issued prior to certification of its LCP may be appealed to the Commission. The Commission shall hear an appeal unless it determines that no substantial issue exists as to conformity with Chapter 3 policies of the Coastal Act.

Section 30250(a) of the Coastal Act states, in relevant part:

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.

Section 30251 of the Coastal Act states, in relevant part:

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.

Section 30253(e) of the Coastal Act states, in relevant part:

New development shall...

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

The Venice Certified LUP defines “Lot Consolidation” as follows:

Lot consolidation occurs when: (1) one or more structures are built over a lot line dividing two lots created in a previous subdivision; or (2) a lot line is abandoned, a lot line is adjusted, lots are merged, or other action is taken, for the purpose of allowing a structure to be built extending over what were previously two or more separate lots.

Venice LUP Policy I.E.1 General, states

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.

Venice LUP Policy I.E.2 Scale, states.

New development within the Venice Coastal Zone shall respect the scale and character of the community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods.

Venice LUP Policy I.E.3 Architecture, states.

Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

Venice LUP Policy I.A.2 Preserve and Protect Stable Single-Family Neighborhoods states, in part:

Ensure that the character and scale of existing single family neighborhoods is maintained and allow for infill development provided that it is compatible with and maintains the density, character and scale of the existing development.

Venice LUP Policy I.A.5 Preserve and Protect Stable Multi-Family Neighborhoods, states:

Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained and improved.

Venice LUP Policy I.A.7 Multi-Family Residential – Low Medium II Density states, in part:

Accommodate the development of multi-family dwelling units in the areas designated as “Multiple Family Residential” and “Low Medium II Density” on the Venice Coastal Land Use Plan (Exhibits 9 through 12). Such development shall comply with the density and development standards set forth in this LUP.

...Marina Peninsula

Use: Two units per lot, duplexes and multi-family structures.

Density: One unit per 1,200 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units per lot.

Yards: Yards shall be required in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.

Height: Not to exceed 35 feet. Structures located along walk streets are limited to a maximum height of 28 feet. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).

Venice LUP Policy I.A.9 Replacement of Affordable Housing, states:

Per the provisions of Section 65590 of the State Government Code, referred to as the “Mello Act”, the conversion or demolition of existing residential units occupied by persons and families of low or moderate income shall not be permitted unless provisions have been made for replacement of those dwelling units which result in no net loss of affordable housing in the Venice Community in accordance with Section 65590 of the State Government Code (Mello Act).

Venice LUP Policy I.A.16 Exceptions, states:

No exceptions to the replacement housing policies of this LUP shall be permitted within the Venice Coastal Zone except as permitted by Section 65590 of the State Government Code (Mello Act).

**Appellant’s Argument No. 1: The project is not visually compatible with the mass, scale, and character of the surrounding neighborhood, including yard and permeable land area requirements.**

The appellant asserts that the proposed development is incompatible with the mass, scale, and character of the surrounding area, and is therefore inconsistent with LUP Policies I.A.5 (preservation and protection of stable multi-family neighborhoods), I.E.1 (consistency with the Chapter 3 policies of the Coastal Act), I.E.2 (scale), and I.E.3 (architecture). In particular, there is concern that the proposed development would be nearly 2.5 times larger, in terms of square footage, than the existing residences onsite. The unique west-

east orientation of the newly proposed single-family residences, the reduced setbacks from Catamaran Street and the west alleyway, the proposed height of 35 feet, the exterior appearance (color and articulation), and the proposed bulk and massing, are alleged to create visual impact for pedestrians and nearby residents. The appellant also asserts that the proposed yards are not consistent with LUP Policy I.A.7.c, which requires yards to provide “fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.” The appellant also asserts that the development setbacks ([Exhibit 8](#)) are inconsistent with the existing pattern of development and permeable yard area along Catamaran Street and create a “boxy” appearance worsened by minimal landscaping and massing adjacent to the street frontages.

When reviewing the project, the City conducted a preliminary analysis of 18 structures between Buccaneer Street and Catamaran Street, excluding the subject site ([Exhibit 7](#)). The City characterized the area as containing one to three-story single-family and multi-family structures, and the structures on the southern side of Catamaran Street are primarily two and three-story multi-family dwellings. The City stated that the proposed development would conform with the character of surrounding development, as well as development standards in the certified LUP, namely Policies I.A.1, I.A.5, I.A.7, I.E.1, I.E.2, I.E.3 and II.A.3. The City found that the proposed development is limited to the property line, will not encroach onto the public right-of-way, and would meet the required density and height standards in visual compatibility with the surrounding area.

Commission staff reviewed the City-approved project plans and compared them to the 12 developed lots along Catamaran Street between Pacific Avenue and Strongs Drive ([Exhibit 7](#)).<sup>2</sup> The subject site sits at the corner of Catamaran Street and an unnamed alley due west. Based on the Commission’s neighborhood survey area, the proposed development is consistent with the surrounding character of development, with an average structural size of 6,931 sq. ft. and residential density of 5 units per lot. While the average height found for the survey area is 25 feet, nearly all structures in the survey area are at least two stories, and furthermore, there are three buildings that are at least 35 feet tall.

The LUP requires yards “in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood.” The subject development would cover the majority of the project site and proposes limited yard area. No yard area is proposed adjacent to the northern unnamed alley and yard area on the other three sides of the site range from approximately 250 sq. ft. to 540 sq. ft. Further, the proposed yard areas will consist primarily of hardscape to allow for vehicle access adjacent to the western unnamed alley and pedestrian access adjacent to Catamaran Street and at the rear of the structures. However, the limited yard space appears to be

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<sup>2</sup> Commission staff chose a different survey area than the City in order to remain consistent with past recent Venice projects reviewed by the Commission where the survey area generally included the homes on either side of the primary street, which is Catamaran Street for the subject project. However, the proposed home alignment will front the adjacent western unnamed alley. Thus, the City’s survey area was also reasonable and consistent with past Commission action.

consistent with the development pattern of the existing structures within the survey area along Catamaran Street between Pacific Avenue and Strongs Drive. Along the north side of Catamaran Street some of the existing sites have traditional vegetated yard areas, while the majority have developed or hardscaped nearly the entirety of the sites. Along the north side of Catamaran Street, the existing large multi-family structures cover nearly the entirety of the sites and appear to provide even less yard area than proposed with the subject project. The City's approval of the project requires approval by the Fire Department prior to plan sign off and indicates that the project is designed to adhere to the City's best management practices for stormwater runoff. Thus, while the proposed yard space for the subject site is lacking in terms of open space, permeable land area for on-site percolation of stormwater, and on-site recreation, yard space is consistent with the existing scale and character of the neighborhood and this contention does not raise a substantial issue.

The appellant correctly contends that the proposed development is 'generally boxy', has minimal setbacks, and does little to reduce its massing when viewed from the adjacent public streets. Aside from the structures' windows and balconies, each of the four proposed homes are essentially rectangular boxes. However, the survey area is characterized by a mix of development including smaller older structures with architectural articulation, like the existing structures that exist on the subject site, but also by much larger box-like multi-family structures with little to no setback directly across Catamaran Street from the subject site. The applicant proposes approximately 8 inches of separation between each of the single-family residences. The small side separations between each proposed single-family residence further gives the development a visual appearance similar to multi-family residences within the neighborhood survey area, many of which do not have defined structural articulation, interior separations between structures or units, or significant setbacks from the streets. The City did not grant variances or exceptions for this project and the LUP does not provide setback standards for this area. Thus, the boxy design and minimal setbacks of the proposed structures is consistent with community character of this area of Venice.

Therefore, the contention that the proposed development is visually incompatible with the mass, scale, and character of the surrounding area, including the size, residential density, height, and front/side/rear yard setbacks of the proposed development, does not raise a substantial issue with Section 30250, 30251, or 30253 of the Coastal Act.

**Appellant's Argument No. 2: The proposed project would result in a loss of residential density and would not preserve overall density in an area able to accommodate it.**

LUP Policy I.A.5 requires the preservation and protection of multi-family residential neighborhoods and allows for growth in areas with sufficient services and infrastructure. Policies I.A.6 and I.A.8 include protections and standards for development located in Multi-Family Residential – Low Medium I and Medium Density zones, but do not apply to the project site. Policy I.A.7 applies to the subject site, which is designated Multi-Family Residential - Low Medium II. Per the City's uncertified zoning code, the subject site, which has a net lot area of 5,060 sq. ft. split evenly between two lots, is zoned R3-1, which is consistent with the land use designation and allows for single- and multi-family residential

dwellings. The Venice certified LUP allows a maximum density of four dwellings on the lots (1,200 sq. ft. of lot area per unit) in their current configuration.

The subject site is currently developed with two single-family residences and a duplex in an area with sufficient services and infrastructure to accommodate development. The appellant contends that there are five residential units at the site, but the City's certificates of occupancy issued for the site only show four legal units ([Exhibit 6](#)), and the City re-issued its Mello Act Determination on January 7, 2021, in order to account for the illegal fifth studio unit and remove it from consideration ([Exhibit 5](#)). The City's approval is for demolition of the four units, two of which are single-family residences, merger and re-subdivision of the lot, and construction of four single-family residences, thus legal density of the site will be maintained. Thus, the proposed development can be found consistent with both LUP Policies I.A.2 and I.A.5, which require the protection and preservation of existing single- and multi-family neighborhoods. In sum, the City's findings demonstrate factual support that the project will have no net impact on housing density in the area.

Thus, the appellant's contention that the City-approved development is inconsistent with Coastal Act Sections 30250, 30251 and 30253, which support the maintenance of residential density in areas able to accommodate it, does not raise a substantial issue.

**Appellant's Argument No. 3: Subdivision of lots and conversion of multi-family housing to single-family housing subverts neighborhood character and does not conform with the multi-family land use designation.**

The certified LUP defines lot consolidation as occurring when "lots are merged, or other action is taken, for the purpose of allowing a structure to be built extending over what were previously two or more separate lots." LUP Policy I.A.1.b allows consolidation of no more than three lots for residential development in the Marina Peninsula neighborhood, including a restriction that no structure shall be constructed on what were more than two contiguous lots prior to lot consolidation, particular requirements for building façade articulation and architectural variety (implementing use of front porches, bays, and balconies), and ensuring that the "pedestrian scale" of development is maintained. The proposed project proposes to merge and re-subdivide the project site into four (4) small lots, pursuant to the Small Lot Subdivision Ordinance ([Exhibit 8](#)) and LAMC Section 12.22 C.27, which is consistent with the density permitted by the zone, land use designation, and applicable LUP policies. The proposed small lots will have square footages of 1,412 (Parcel A), 1,172 (Parcel B) square feet of 1,172 (Parcel C), and 1,174 square feet (Parcel D), meeting the minimum requirement of at least one unit per lot.

The appellant contends that the local CDP approves consolidation and re-subdivision of four lots that is inconsistent with the intent of the certified Venice LUP. The appellant considers the lot merger and re-subdivision to be contrary to Policy I.A.7 of the LUP, which states that development in the Multi-Family Residential – Low Medium II Density areas shall comply with the density and development standards set forth in the LUP, including the permitted use for "duplexes and multi-family structures." The appellant also contends that the construction of single-family residences in multi-family designated areas is in conflict with LUP Policy I.A.5 to maintain the character of stable multi-family

neighborhoods and that the small lot subdivision to impact the community character of the site by creating small lot sizes with an east-west oriented lot split that is perpendicular to the north-south orientation of neighboring lots, citing the requirements set forth in LAMC 17.50 of the City's uncertified zoning code.

The City found that the proposed development, including the lot merger and re-subdivision, will conform with the requirements in LUP Policy I.A.1, the parking requirements outlined in LUP Policy II.A.3, and the permitted uses and density requirements set forth in LUP Policy I.A.7.c. In the associated approval of Parcel Map No. AA-2017-3122-PMLA-SL, the City had additional findings regarding the potential impacts that the lot subdivision would have on housing density, fish and wildlife habitat, public health, public access easements, and consistency with all applicable general and specific plans. In summary, the City has found that the lot merger and re-subdivision does not raise any issues of community character, nor inconsistency with the permitted uses and nature of the multi-family designated neighborhood outlined in the LUP.

In past actions, the Commission has found that single-family residences are an allowable use in areas, like the project site, designated Multi-Family Residential – Low Medium I and Low Medium II Density, even while duplexes and other multi-unit residential development are a significant component of the character of the subject neighborhood.<sup>3</sup> Construction of multiple single-family dwellings within an area designated for multi-family residential development can be authorized if compatible with the community character of the area and avoids contributing to a larger trend of coastal housing loss consistent with the Coastal Act Sections 30250, 30251 and 30253. As discussed previously, the proposed project will not lead to the loss of housing density at the subject site; and, while the project proposes single-family residences, due to their design which includes very little space between units, the resulting project will be visually compatible with the multi-family residential character of the surrounding area and will not conflict with the permitted uses and densities outlined in the site's land use designation. In fact, the City's determination references ZA-2005-5941-CDP-ZAA-SPP-MEL, which corresponds to CDP 5-06-481 approved by the Commission authorizing a very similar small lot subdivision pattern at 121 Catamaran Street, a Multi-Family Residential – Low Medium II Density lot.<sup>4</sup> Therefore, the appellant's contention regarding lot consolidation, and its alleged subversion of multi-family residential neighborhood character does not raise a substantial issue with regard to project consistency with Sections 30250(a), 30251, or 30253 of the Coastal Act.

**Appellant's Argument No. 4: The proposed project will result in adverse cumulative impact on community character.**

The appellant discusses the City's review of the project's adverse cumulative effects on community character and its conformance with Section 30250(a) of the Coastal Act. The appellant claims that the City did not conduct a cumulative effects analysis, mainly in relation to: (a) substitution of multi-family housing with single-family residential development in areas with multi-family residential land use designations; (b) higher floor-

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<sup>3</sup> [5-20-0538](#) (Shoda); [A-5-VEN-21-0010](#) (Miles)

<sup>4</sup> It should be noted that the approved development was never constructed.



area ratios and reduced setbacks that will negatively impact mass, scale, and character of the proposed and future development in the area; (c) substitution of open space and permeable yard area on the ground level with upper-level roof decks, and; (d) visual compatibility with neighboring multi-family residential structures. As discussed above, the City conducted an analysis of 18 structures between Buccaneer Street and Catamaran Street City to determine that proposed development is limited to the property line, will not encroach onto the public right-of-way, and would meet the required density and height standards related to visual compatibility with the surrounding area. The City's determination did not include analysis of the project's potential cumulative impacts on the built/physical character-defining features of Catamaran Street or the larger Marina Peninsula neighborhood of Venice.

To evaluate the potential cumulative impacts of the City-approved project, the incremental effects of the proposed development on community character, mass, and scale are considered in connection with the effects of the past, current, and probable future projects within the subject area. To that end, Commission staff reviewed the 12 residential developments along both sides of Catamaran Street between Pacific Avenue and Strongs Drive where the subject site is located ([Exhibit 7](#)). The cumulative effects analysis considered the year of Commission or City approval for development, lot size, habitable residence area, and height. The information analyzed by Commission staff shows that the City-approved residence has a height and size consistent with past Commission and City approvals since 2001. Prior to certification of the LUP in 2001, approximately 73 percent (or 11) of the homes in the survey area were multi-family dwellings, including the duplex at subject site. Since 2002, the City has authorized only one instance for a change in housing density in the survey area, for the demolition of one single-family dwelling and construction of two single-family residences on two subdivided small lots. The subject project will replace two existing single-family homes and a duplex with four single-family homes. Although the project would result in a decrease of the percentage of multi-family structures (from 73 percent to 63 percent or 11 to 10) because of the additional single-family housing units, there would be no actual loss of residential density. Also, upon a visual review of the homes in the survey area, there are a variety of architectural styles, many of which were built after the Craftsman bungalow era and prior to the establishment of the Coastal Act and subsequent LUP. Therefore, the contention that the proposed project would set a precedent of residential development without character-defining features and cause an adverse cumulative impact does not raise a substantial issue with regard to Section 30250 of the Coastal Act.

**Appellant's Argument No. 5: The Coastal Act's affordable housing provisions and the Commission's Environmental Justice Policy were not considered.**

The appellant contends that the proposed project will demolish multi-family, affordable housing and construct high-priced, single-family housing in its place, which will have adverse cumulative impacts on the lower-income and economically diverse community of Venice. In support of her contention, the appellant asserts that the Mello Act Determination is not accurate and that there are inconsistencies with the City's determination that pertain to the number of existing units. The appellant referred to information collected from the

ZIMAS in order to assert that a fifth unit exists onsite and that all existing units are rent-stabilized.

Commission staff reviewed the City’s Department of Building and Safety records (including building permits and certificates of occupancy), which indicate that the fifth unit was not permitted ([Exhibit 6](#)). City staff corroborated that the certificates of occupancy and building permit records are correct. The original HCIDLA Mello Act Determination dated June 22, 2020 indicated that there were five units onsite, but upon discovering the unpermitted nature of the studio unit in 111 Catamaran, HCIDLA revised its review and reissued a Mello Act Determination on January 7, 2021. For the Mello Act Determinations (both original and revised), HCIDLA collected monthly housing cost data for the previous three years between April 2015 and April 2018. HCIDLA concluded that no affordable units exist on the property using the 2019 Land Use Schedule VII Income and Rent Limit. In any case, Mello Act (affordable housing) determinations do not present a substantial issue as to conformity with Chapter 3 of the Coastal Act. Likewise, the Commission’s Environmental Justice Policy and the affordable housing policies of the Coastal Act are not part of Chapter 3. However, in conjunction with guidance provided under LUP Policies I.A.9 and I.A.16, the Commission encourages the protection of existing and the provision of new affordable housing and may consider environmental justice and the equitable distribution of environmental benefits when considering development, including development on appeal, in the coastal zone of Venice.

In 2019, the Commission adopted an environmental justice policy to inform the implementation of Section 30604(h) as the Coastal Act, which gives the Commission the authority to consider environmental justice when acting on a CDP. The Commission recognizes that housing along the California coastline has been influenced by discriminatory housing policies and practices and has affected present day demographics in the coastal zone. In this case, based upon the above-discussed analysis, the proposed development will be compatible with the character and land uses of the surrounding area, will retain legal housing density, and will not lead to loss of affordable housing. Thus, the Commission finds that the project does not raise issues of environmental justice. In addition, the contentions that the City erred in its Mello Act Determination, that the City did not consider the Coastal Act’s affordable housing policies and the Commission’s Environmental Justice Policy, and that the Commission must enforce those said provisions, do not raise a substantial issue with the project’s conformance with Section 30250, 30251, or 30253 of the Coastal Act.

**Appellant’s Argument No. 6: Protection of Venice as a Special Coastal Community was not considered.**

Section 30253(e) of the Coastal Act protects the special characteristics that make Venice a special coastal community and visitor destination. The certified Venice LUP includes Policy I.E.1, which protects two particular traits of Venice as elements that make Venice a “special coastal community”—architectural diversity and social diversity. Architectural diversity has been discussed in many City and Commission decisions for development in Venice.

On the other hand, social diversity can include differences in cultures, political affiliations, and income levels, among other things. When the LUP was certified, Venice was described as a “quintessential coastal village where people of all social and economic levels are able to live in what is still, by Southern California standards, considered to be affordable housing;” this is memorialized in the introduction for Policy Group I of the LUP.

The appellant contends that the prevalence of existing lower-cost, multi-family rental housing, rather than high-price, single-family dwellings, may contribute to the continuance of the traditional character of the Venice community. However, while the Commission encourages the protection of existing and the provision of new affordable housing, if social diversity is measured by the presence of affordable units, at this time the Commission does not have the authority to require protection of social diversity through affordable housing. Furthermore, no affordable units are currently present on the site. While the City’s determination did not include an analysis of the project’s potential impacts on the social diversity of Venice, as described in the response to the appellant’s arguments Nos. 1–4 above, the resulting project will be consistent with the community character policies of the certified LUP and that of the surrounding neighborhood. Thus, the appellant’s contention that the project will have a negative cumulative effect on community character, including social diversity, does not raise a substantial issue with regard to the project’s conformity with Section 30253(e) of Chapter 3 of the Coastal Act.

**Appellant’s Argument No. 7: The City erred in its determination that the proposed project and other similar cases of small lot subdivisions are exempt under CEQA.**

The appellant contends that the City erroneously exempted the project from the California Environmental Quality Act (CEQA) requirements for the preparation of an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND). The City determined that the project represents infill development that will correspond to surrounding uses and will be mainly served by existing infrastructure. The appellant also cites the CEQA requirements pertaining to projects approved under the Small Lot Subdivision Ordinance. The City has determined that a MND is not required as a prerequisite for the application of the Ordinance. Regardless, as directed in Coastal Act Sections 30604 and 30625, compliance with CEQA is not grounds for an appeal. Thus, the appellant’s contention that the City erred in its CEQA determination does not raise substantial issue with regard to the project’s conformity with the Chapter 3 policies of the Coastal Act.

**SUBSTANTIAL ISSUE FACTORS:**

The Commission’s standard of review for determining whether to hear the appeal is whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code § 30625(b)(1); 14 C.C.R. § 13321. The Commission’s decision is guided by the factors listed in the previous section of this report.

**1. The degree of factual and legal support for the local government’s decision that the development is consistent with the relevant provisions of the Coastal Act.** The City found the project would be consistent with the community character of the area and with sections 30250, 30251 and 30253 of the Coastal Act. The City conducted an analysis

of 18 structures between Buccaneer Street and Catamaran Street City to determine that proposed development is limited to the property line, will not encroach onto the public right-of-way, and would meet the required density and height standards in visual compatibility with the surrounding area. The Commission's community character and cumulative impacts analyses support the City's decision that the project, as approved by the City, is consistent with LUP Policies I.E.2 and I.E.3. The City also provided analysis and supporting evidence that the proposed project will not result in loss of housing density or affordable units at the site. Thus, as approved by the City and based on the issues raised in the appeal, the project would not prejudice the City's ability to prepare an LCP that conforms with Sections 30250, 30251, and 3025 of Chapter 3 of the Coastal Act. Therefore, the Commission finds that the City did provide an adequate degree of factual and legal support for its decision. This factor supports a finding of no substantial issue.

**2. The extent and scope of the development as approved or denied by the local government.** The City-approved development will demolish two existing single-family residences and a duplex, to be replaced with four new single-family residences on four newly subdivided lots within a highly urbanized residential area. The scope is consistent with that of the surrounding development, which is comprised primarily of one-story to three-story single- and multi-family residences. Therefore, the Commission finds that, based on the issues raised in the appeal, the extent and scope of the City-approved development is consistent with Chapter 3 policies of the Coastal Act, and this factor supports a finding of no substantial issue.

**3. The significance of the coastal resources affected by the decision.** Venice's unique community character is a significant coastal resource. As described above, the City-approved development will not have an adverse visual impact to the pedestrian scale of this area of Venice. The locally-approved development provides adequate parking, preserves visual resources with its mass and scale, and does not raise issues of coastal hazards. Therefore, the Commission finds that the City-approved development will not have a significant impact on coastal resources, inconsistent with Sections 30250, 30251, and 30253, and this factor supports a finding of no substantial issue.

**4. The precedential value of the local government's decision for future interpretations of its LCP.** The City does not currently have a certified LCP, but it does have a certified LUP. The LUP was certified by the Commission in June 2001 and includes development and parking standards for new development. The Commission relies on the certified LUP for Venice as guidance when reviewing appeals and approving projects because the LUP was certified by the Commission as consistent with Chapter 3 of the Coastal Act. The City-approved development is consistent with LUP Policies I.A.1, I.A.5, I.A.7, I.E.1, I.E.2, I.E.3 and II.A.3. The project, as approved, does not raise a substantial issue about the project's consistency with the certified LUP, and by extension, the Chapter 3 policies of the Coastal Act, as set forth above. Therefore, the Commission finds that the City-approved development will not have an adverse impact on future interpretations of its LUP and will not prejudice the City's ability to certify an LCP. The Commission finds that this factor supports a finding of no substantial issue.

**5. Whether the appeal raises local issues, or those of regional or statewide**

**significance.** Venice has been identified as a Special Coastal Community and is a visitor destination for those from around the state, nation, and world; and, as such, is a coastal resource beyond the local community. The City-approved development is consistent with the applicable policies of the certified LUP and with Chapter 3 of the Coastal Act that protect community character. Therefore, the Commission finds that, based on the issues raised in the appeal, the City-approved CDP does not raise substantial issues of statewide significance. As such, this factor supports a finding of no substantial issue.

**Conclusion**

Applying the five factors listed above clarifies that, the appeal raises no substantial issue on the grounds on which it was filed with respect to the project's consistency with Chapter 3 of the Coastal Act, and there is sufficient support that the project is consistent with the Chapter 3 policies, as well as the LUP policies, with respect to compatibility with community character. The decision is not likely to set an adverse precedent for future interpretations of the Venice LUP and prejudice the City's ability to prepare an LCP in the future. Therefore, the Commission finds that, based on the issues raised in, the appeal, the appeal raises no substantial issue as to the project's conformity with the Chapter 3 policies of the Coastal Act.

## **Appendix A – Substantive File Documents**

1. City of Los Angeles Letter of Determination for Case No. DIR-2017-3121-CDP-SPP-MEL dated May 6, 2022.
2. Staff Report for certification of the Venice LUP dated November 2, 2000.

## Appendix B – Neighborhood Survey Tables

**Table 1.** Past Commission actions on structures within the Commission’s surveyed area since the Venice LUP certification in 2001. The proposed residences are included for reference but is not a part of the averages.

Address	Action No.	Approval Year	Height (ft.)	Lot Size (sq. ft.)	Square Footage (original)	Square Footage (new)	L.A. County Assessor (sq. ft.)
109-111 Catamaran St	A-5-VEN-22-0032	N/A	35	5,060	1,439 782 936	2,002 1,915 1,915 1,854	3,157
114 Catamaran St	5-18-0012-X <sup>5</sup>	N/A	N/A	N/A	N/A	N/A	N/A
114 Catamaran St	5-18-0097-X	2018	21	5,998	7,278 <sup>6</sup>	8,068 <sup>7</sup>	8,068
121 Catamaran St	5-06-481	2008	2-story	2,714	576	N/A <sup>8</sup>	576
Average Square Footage (Original/Redeveloped):					3,927	4,322	4,322
Average Height (Redeveloped):					24		

**Table 2.** All structures currently within the Commission’s surveyed area that were constructed prior to certification of the Venice LUP in 2001. For the few multi-family structures in the survey area, the square footage of any detached structures were combined into one square footage.

Address	Original Year Built	Lot Size (sq. ft.)	Square Footage <sup>9</sup>	Height (ft.) <sup>10</sup>	Number of Units <sup>11</sup>
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<sup>5</sup> This exemption was returned per C.C.R. Section 13253(b)(7).

<sup>6</sup> Building records from 1969 show that the structure was proposed to be 4,500 sq. ft. However, it appears to have been built much larger.

<sup>7</sup> This exemption allowed for the conversion of 790 sq. ft. storage room into a common recreation room for tenants.

<sup>8</sup> This permit allowed for the construction of two single-family residences (each 1,546 sq. ft.) on a subdivided lot. The approved project was not constructed, and the original structure remains.

<sup>9</sup> The square footage could include additions approved after the original construction but prior to the 2001 certification of the Venice LUP. Based on Assessor’s data.

<sup>10</sup> Assuming 1-story = 14 ft., 2-story = 27 ft., and 3-story = 30 ft. Note: many redeveloped building heights are above the 35-foot height limit included in the LUP.

<sup>11</sup> As shown in the City’s Department of Building and Safety records (building permits and/or certificates of occupancy).

A-5-VEN-22-0032 (Kenig)  
 Appeal – No Substantial Issue

102 Catamaran St <sup>12</sup>	1990	18,144	37,392	43	24
108 Catamaran St	1967	2,999	3,168	18	2
117 Catamaran St	1969	5,428	6,820	31	7
118 Catamaran St	1968	3,000	3,114	2-story	2
121 Catamaran St <sup>13</sup>	1936	2,714	576	2-story	1
123 Catamaran St	1915	2,714	892	15	1
124 Catamaran St	1970	5,397	6,354	26	6
125 Catamaran St <sup>14</sup>	1987	2,713	3,898	36	2
130 Catamaran St	1971	8,997	12,197	26	11
3320 Pacific Ave	1964	5,019	5,661	16	6
3323 Grand Canal <sup>15</sup>	2000	2,700	3,108	35	2
Total Number of Residential Structures:			12		
Average Square Footage:			6,931		
Average Height:				25	
Average Number of Units:					5

\*Information obtained from ZIMAS on July 22, 2022

<sup>12</sup> CDP 5-87-645

<sup>13</sup> CDP 5-87-205 was issued, but the approved project was never constructed, and the original structure remains.

<sup>14</sup> CDP 5-86-843

<sup>15</sup> CDP 5-97-097/CDP 1998-12