

CALIFORNIA COASTAL COMMISSION

South Coast District Office
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W15c

5-22-0658 (Girgis)

February 8, 2022

CORRESPONDENCE

From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Thursday, February 2, 2023 10:17 AM
To: Lee, Vince@Coastal <vince.lee@coastal.ca.gov>
Cc: ICRM <indigenous.crm@gmail.com>; Kara Grant <kara@grant-law.net>; Matt Teutimez.Kizh Gabrieleno <matt.teutimez@gmail.com>
Subject: Re: South Coast Projects for upcoming hearing: 8100 Calabar (5-22-0658 & 5-22-0659)

Good morning Vince and thank you for sharing the proposed mitigation measures for this project. We would like to address some very important concerns we have with your proposed mitigation measures your consultant provided to you. Please see below.

Please be advised that CEQA has been revised to add Tribal Cultural Resources as their own element. The State has defined Tribes as the experts of the resources within this element. No longer are Archaeologist or Anthropologist or Historians or academic institution or any non-tribal entity the authority over our resources. We are the experts of our own resources. Therefore we ask that you please keep our Tribal cultural Resources (TCR) separate from Archaeological resources. *The mitigation measures should be specific to TCR for purposes of complying with CEQA . Also we ask that the mitigation measures we provided to you that they are only kept between our tribal government and you the lead agency for they are not to be provided to any third party consultant and protected by the confidential act AB52. Thank you*

**Diane Doesserich and Timothy Nugent
8110 Calabar Avenue
Playa del Rey, CA 90293**

**Vince Lee
California Coastal Commission
South Coast District Office
301 E. Ocean Blvd., Suite 300
Long Beach, CA 90802**

Position: Oppose

Re Permit No: 5-22-0658
5-22-0659

Hearing: February 8, 2023
Item No: W15c and W15d

Project Location: 8104 and 8100 South Calabar Avenue, Playa del Rey, Los Angeles

Dear Mr. Lee,

This letter is in regard to a Coastal Commission permit to build two houses on the properties located at 8100 and 8104 Calabar Avenue, Playa del Rey, CA 90293. We are opposing the granting of the permit for the following reasons:

1. The proposed developments are not compatible with the Coastal Bluffs Specific Plan.

The proposed project must meet all of the conditions of the Coastal Bluffs Specific Plan. A purpose of the Specific Plan is:

D. To prepare specific development and environmental regulations tailored to the particular conditions and circumstances of the Playa del Rey Bluffs consistent with the general policies of the adopted Los Angeles General Plan and the Westchester-Playa del Rey Community Plan.

E. To regulate all development, including use, height, density, bulk and other factors in order to provide for the protection and enhancement of views of scenic features visible from scenic corridors and scenic highways, and to assure that development is compatible and in character with the existing community.

The proposed developments are in direct conflict with the conditions of the Coastal Bluffs Specific Plan. It would allow development that is not compatible or in character with the existing community (see sections 3 and 4 below).

2. The proposed developments are inconsistent with and in direct contradiction to the Westchester-Playa del Rey Community Plan and the Los Angeles General Plan.

The Westchester-Playa del Rey Community Plan refines the General Plan and states the following (page 11-1):

- a. *The General Plan is the fundamental planning policy document of the City of Los Angeles. It defines the framework by which the City's physical and economic resources are to be managed and utilized over time.*
- b. *The General Plan guides the City in the use of public and private land, the design and character of buildings and open spaces, the conservation of existing housing and provision of new housing, commercial development, the provision of supporting infrastructure and public services, the protection of environmental resources and the protection of residents from natural and other known hazards.*
- c. *The General Plan expresses the City's intentions with respect to the rights and expectations of the general public, property owners, and prospective investors and business interests.*

The Westchester-Playa del Rey Community Plan addresses the significant planning and land use issues applicable to that region and identifies the most significant planning and land use issues as follows (page 1-4):

- *The need for **consistency** in land use designations, **zoning** and the existing uses and;*
- ***Influx of newer residential development that is incompatible with the scale and character of existing surrounding neighborhoods.***

The proposed developments violate the provisions and intent of the General Plan and Community Plan and would allow development that is inconsistent with the scale and character of the neighborhood for the reasons stated above.

The Westchester-Playa del Rey Community Plan states under Objective 1-3:

- *Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.*

The proposed development of two disproportionately large houses virtually identical in design is in opposition to this objective.

The Westchester-Playa del Rey Community Plan states under Objective 1-6:

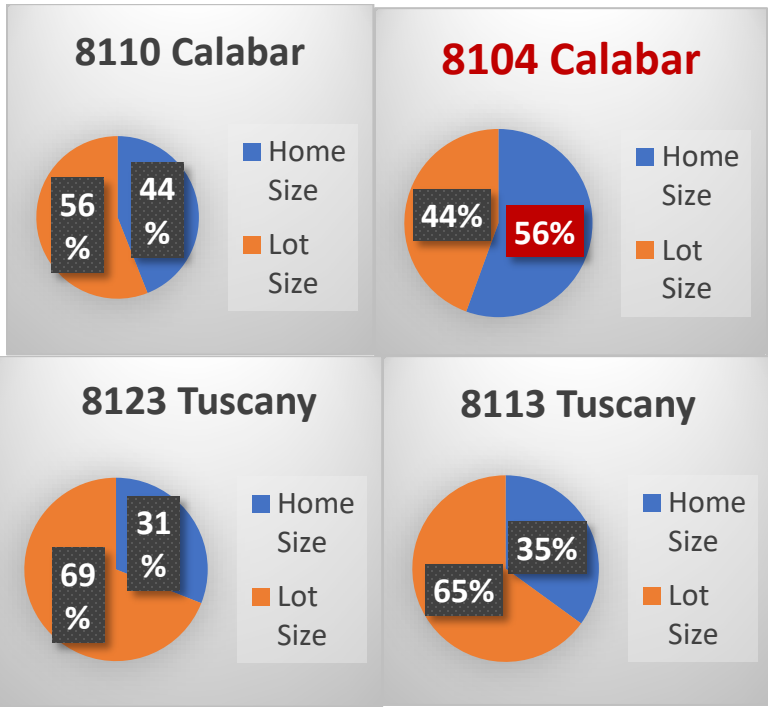
- *Objective 1-6 Preserve visual resources in residential areas.*
 - *Policies*
 - *1-6.1 The preservation of existing scenic views from surrounding residential uses, public streets and facilities, or designated scenic view sites should be a significant consideration in the approval of zone changes, conditional use permits, variances, divisions of land and other discretionary permits.*

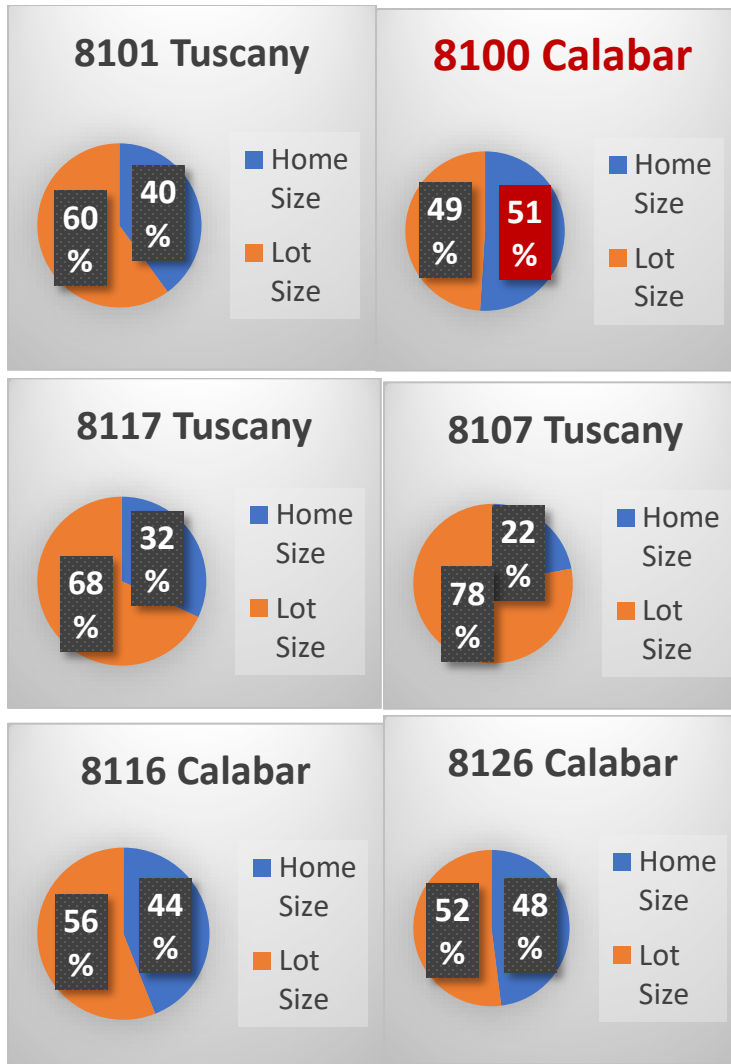
The proposed development would obstruct the views of the neighboring houses.

3. The proposed houses are too large for the lot size.

The new houses are substantially disproportionate to the lot size. Both houses would be significantly larger than other houses with comparable lot sizes which would impact the continuity and character of the neighborhood. Houses in the neighborhood with larger square footage also have very large lot sizes (see below).

Address	Home Size	Lot Size	Ratio- Lot size to home size
8123 Tuscany	4000	12632	0.32
8117 Tuscany	3536	14374	0.25
8113 Tuscany	4377	12196	0.36
8107 Tuscany	2700	11761	0.23
8101 Tuscany (Adjacent)	4370	10890	0.40
8100 Calabar (New Development)	3897	7579	0.51
8104 Calabar (New Development)	3195	5790	0.55
8110 Calabar (Adjacent)	2645	5943	0.45
8116 Calabar	2432	5492	0.44
8126 Calabar	2659	5493	0.48





The proposed plans by applicant exceed home size vs lot size by greater than 51%.

The following inconsistencies in the design plans were also found:

- Scope of Work in the plans is incorrect. Sheet A-0 for both 8100 and 8104 state a proposed scope of two-story residences with attached 2-car garages, which conflicts with the rest of the plans. The plans are proposing a 3 level home with a habitable basement.
- Basements in the plans are not consistent with the code. Per Article 2, SEC.12.03 of the City of Los Angeles Code of Ordinances, Residential Floor Area (RFA) is “The area in square feet confined within the exterior walls of a residential or non-residential building on a lot in an RA, RE, RS, or R1 Zone.” This definition does state that basements are exempt, but only if the floor above the basement does not exceed 2 feet in height at any point above the finished or natural grade. As shown on sheet A-11.0, the proposed floor elevation above the basement is approximately 4.8 feet above finish grade, *over twice the exceedance limit.*

- The applicant states in their letter that the floor area of 8104 Calabar is 2588 sf. The plans include a 740 sf “basement” which consists of an entertainment room, bedroom, bathroom and a bar which are habitable rooms which would make the house 4 stories.
 - The 8100 Calabar plans are proposing a 850 sf “basement” consisting of an entertainment room, bedroom, bathroom and a bar making the total square footage 3897 and 4 stories. As indicated above the proposed houses are disproportionately larger than the other houses in the area relative to their lot size and the current plans do not comply with the code requirements of a basement.
- Easement: There are existing easements on both properties that are neither labeled nor dimensioned on the plans.

4. The houses are identical in design.

What makes Playa del Rey special is that each house is unique and different. The applicant is proposing to build two identical large houses which is out of character with the neighborhood.

5. Incorrect earthwork calculations.

The earth work quantity calculations for the proposed development are inadequate and leave little room for possible over excavation that may be required if unsuitable soils are identified during excavation. These calculations should be revised to show actual understanding of anticipate cut volumes for each building level based on the proposed elevations, an educational guess for the required foundations/structural piers and crawl spaces, an estimate for exterior earthwork for stairways and landscaping, and a factor of safety for potential unsuitable soils.

The applicant has not demonstrated or provided evidence that they have met the required findings for approval for granting of the requested Coastal Commission Permit. Should this permit be granted and any impacts due to excavation occur to the neighboring houses, the developers, owners and the City of Los Angeles would be liable for any damages incurred.

We are opposing this permit and are requesting that it be denied, however we are amenable to design modifications. The owner of the property has the right to build houses within the parameters of the applicable codes and regulations taking into consideration the characteristics of the neighborhood.

Your attention to this matter is greatly appreciated. Thank you.

Regards,

Diane Doesserich Tim Nugent

Diane Doesserich and Timothy Nugent

In support of opposing the Coastal Commission permit:

- Mark Handin and Jaculyn Spezze
8116 Calabar Avenue, Playa del Rey

- Don Popkes
8101 Tuscany Avenue Playa del Rey

- Cornelia Mitchell
8130 Calabar Avenue, Playa del Rey

- Scott A. and Sherilee Woodhams
Sherilee B. Woodhams
8134 Calabar Avenue, Playa del Rey

- Greg Johnson
8105 Calabar Avenue, Playa del Rey

- August and Dylan Cole
8115 Calabar Avenue, Playa del Rey

- Bob and Sue Mallory
8123 Calabar Avenue, Playa del Rey

- Linda Topal
8200 Calabar Avenue, Playa del Rey