

CALIFORNIA COASTAL COMMISSION

South Coast District Office
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W13a

A-5-VEN-26-0003 (Sondra and Henry Abouaf, Venice)

March 11, 2026

CORRESPONDENCE 3

From: [Vaughn, Shannon@Coastal](mailto:Vaughn,Shannon@Coastal)
To: [Vaughn, Shannon@Coastal](mailto:Vaughn,Shannon@Coastal)
Subject: FW: Opposition to Staff Recommendation of No Substantial Issue in A-5-VEN-26-0003
Date: Monday, March 9, 2026 2:26:19 PM
Attachments: [Opposition to Staff Recommendation of No Substantial Issue in A-5-VEN-26-0003 .pdf](#)

From: Margaret Molloy <mmmolloy@earthlink.net>
Sent: Friday, March 6, 2026 4:57 PM
To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; Torres, Janet@Coastal <janet.torres@coastal.ca.gov>
Cc: Naomi Nightingale <nightingalenaomi@yahoo.com>
Subject: Opposition to Staff Recommendation of No Substantial Issue in A-5-VEN-26-0003

Please share with staff and commissioners:

Opposition to Staff Recommendation of No Substantial Issue in A-5-VEN-26-0003

Appreciatively,

Dr. Naomi Nightingale

Margaret Molloy

Date: 3/06/2026

Subject: Opposition to Staff Recommendation of No Substantial Issue in A-5-VEN-26-0003

Hello Commissioners,

Dr. Naomi Nightingale and Margaret Molloy submitted A-5-VEN-26-0003, an Appeal of City of Los Angeles Coastal Development Permit No. CPC-2024-5346-DB-CU3-CDP-SPPC-MEL-PHP-HCA at 657 Sunset Avenue, Venice, CA 90291.

Appeal of City of Los Angeles Coastal Development Permit No. CPC-2024-5346-DB-CU3-CDP-SPPC-MEL-PHP-HCA of approval with conditions for the demolition of a one-story and a two-story duplex totaling four units on a 9,415 sq. ft. lot, and the construction of a new four-story, 48-ft.-7.5-in.-high, 18,773 sq. ft. 25-unit apartment building, comprised of 19 market-rate units and six Very Low-Income units, 11 on-site vehicular parking spaces, and the removal of two street trees.

Unfortunately, the commission's staff report is recommending a finding of "No Substantial Issue." We believe their findings are conclusory and invalid for many reasons.

First, the "historic Balck Oakwood Residential Community" is the first and only remaining intentional Black coastal community on the entire California coast.

Currently, under the Coastal Act development must be compatible with the mass, scale and character of a community; and must respect and preserve the social and architectural diversity that creates the unique community character in Oakwood per §§ 30253(e) and 30251.

Below is a section of the commission's staff report for the Venice Place Hotel project at 1021-1051 Abbot Kinney published on 12/02/2022. It quotes the right issues even though the commission's approval of that project is fundamentally flawed, especially in regard to the failure to analyze and produce findings for direct impacts on Oakwood specifically, in violation of § 30105.5.

Venice Place_A-5-VEN-21-0011_staff report 12:02:2022

Coastal Act sections 30253(e) and 30251, together, require the protection of the unique characteristics—visual and otherwise—that make coastal communities like Venice popular destinations. The Commission has previously found that Venice's unique social and architectural diversity should be protected as a Special Coastal Community. When the Commission certified the Venice LUP in 2001, it considered the potential impacts that development could have on community character, and, in order to protect community character and minimize impacts to coastal resources, consistent with Coastal Act section 30250, the Venice LUP includes building restrictions and density limits specific to individual areas and subareas of Venice.

LUP Policies I.E.2, I.E.3 and Coastal Act section 30251 require development to maintain existing neighborhood scale, massing, landscape, and character and be visually compatible with the character of the area. The proposed hotel development would be approximately 70,000 sq. ft. in size and composed of four 30-ft. tall, three-story buildings. Regarding mass, the three new structures would be articulated and stepped back in multiple locations to reduce the massing as seen from Abbot Kinney Boulevard and Electric Avenue. Breaking up the development into four buildings (three new buildings and one existing building) further reduces the massing to avoid the appearance of one giant, rectangular mass that takes up the entire block. Furthermore, the proposed development includes several planted areas, including in the front yard, courtyard area, and rooftop areas. The architectural design of the proposed

In 2021, current Los Angeles City Council President Marques Harris-Dawson made the following statement about the Venice Place project as Chair of the City Council's Planning & Land Use Management committee:

"Given that this seems like a very sensitive project in one of the most impacted neighborhoods in the United States, frankly, the Venice Beach community, the historic Oakwood neighborhood, certainly Abbot Kinney, anybody who's been on that thoroughfare in the last ten or fifteen years recognizes the aggressive nature of the change there."

That statement applies here.

The Venice Land Use Plan was certified by the Coastal Commission in 2001. **Policy I. A. 6. Multi-Family Residential - Low Medium Density** (below) limits building height in the Oakwood neighborhood: **"Not to exceed 25 feet for buildings with flat roofs, or 30 feet for buildings with stepped back or varied rooflines. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).**

The First Baptist Church of Venice at 685 Westminster Avenue in Oakwood is a City of Los Angeles Historical Cultural Monument. FBCV has always been a *beacon* in the Oakwood neighborhood at 43ft. high, approved with a height “exception” as an important community-serving institution. All other buildings have a maximum height between 25-30ft. The proposed building at 657 Sunset Avenue would be 48-ft.-7.5-in.-high. This would harm neighbors; set precedent; and irreparably prejudice the development of a certified Venice Local Coastal Program.

Additionally, the LUP allows three lot ties only in two places in Venice – Oakwood, and the Marina Peninsula which is an entirely different situation. Oakwood residents have wanted this changed forever, seeing it as yet another example of how a former racially segregated community subject to a restrictive covenant, and later redlined, could be even further impacted, separate from any other residential section of Venice. This project is an example of how detrimental this could be as a precedent in Oakwood. This proposed development is a two-lot tie at 9,415sq. ft. and four-story, 48-ft.-7.5-in.-high. As stated, currently, developers can buy three lots and develop at this intensity if approved this development. It would harm neighbors; set precedent; change the Oakwood community character forever; and irreparably prejudice the development of a certified Venice Local Coastal Program.

Commission staff wrote in their report for 5-VEN-25-0071:

The City relied on state and local density bonus law and related provisions to conclude that exceptions to LUP standards were appropriate. However, the state density bonus law does not override the LUP, which is an extension of another state law, namely the Coastal Act. In fact, the state density bonus law explicitly indicates that it shall not be implemented in a way that conflicts with the resource protection policies of Coastal Act. While it is important to harmonize different state statutes and local provisions, the standard of review here is Chapter 3 of the Coastal Act, with the LUP serving as guidance. At this location in urban Venice, the coastal resource protection question centers on community character and public access. The City relied on the maximum allowable density for the site based on the LUP’s land use designation, rather than Oakwood area specifically, as well as the density bonus provisions of the local uncertified municipal code, in order to approve an overall project consisting of 25 units, resulting in a larger and bulkier building than would otherwise be allowed by the LUP. Nevertheless, the LUP (and the Coastal Act) encourages affordable housing, and thus the question of whether the City’s action appropriately gave density bonus incentives when deviating from

development standards in the LUP is relevant, but not necessarily conclusive in terms of impacts to coastal resources that rise to the level of a substantial issue.

This is not an appropriate assessment. The Oakwood community supported an over-height 100% affordable housing development (40ft.) by the Venice Community Housing Corporation at 720 Rose Avenue. But that residential development is on Rose Avenue, almost adjacent to the Whole Foods shopping center, and Lincoln Boulevard, a true commercial corridor. Oakwood is a multi-generational residential community.

Also, LUP Policy I. A. 5 specifically states that new development must “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.” (below) Oakwood has narrow streets and very scarce street parking. The community is already impacted by nearby commercial development and beach visitors seeking free on-street parking. This parking demand has been exacerbated by the removal of (a) required private parking for restaurants with Al Fresco Dining, and (b) the removal of free street parking and affordable public-meter street parking throughout Venice with Al Fresco Dining. Oakwood does not have “sufficient public infrastructure and services” so that “the residents’ quality of life can be maintained and improved” by a development like this, and others that would follow if this were approved.

Policy I. A. 5. Preserve and Protect Stable Multi-Family Neighborhoods. 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.

Finally, this precedent would be entirely detrimental to community efforts in Oakwood to preserve and recognize the “historic Black Oakwood Residential Community.” We highlighted these efforts in our appeal, showing several HCM designations in the community that are a part of that effort.

For these reasons but not limited to these reasons, please deny the staff’s recommendation and support this appeal.

Appreciatively,

Dr. Naomi Nightingale

Margaret Molloy

Certified Venice Land Use Plan

Oakwood • Milwood • Southeast Venice

Oakwood-Milwood-Southeast Venice Subarea, generally bounded by the City of Los Angeles boundary line on the north, Washington Boulevard on the south, Lincoln Boulevard on the east, and Hampton Drive, Electric Avenue, Patricia Court, and Strongs Drive on the west, as shown on Exhibits 6a and 6b.

Policy I. A. 1. Residential Development. *The maximum densities, building heights and bulks for residential development in the Venice Coastal Zone shall be defined by the Land Use Plan Maps and Height Exhibits (Exhibits 9 through 16), and the corresponding land use categories and the development standards as described in this LUP. Refer to Policies II.C.10 for development standards for walk streets and to Policies II.A.3 and 4 for parking requirements.*

b. Residential Lot Consolidations. *In order to preserve the nature and character of existing residential neighborhoods, lot consolidations shall not be permitted in the Venice Canals and Silver Strand residential neighborhoods. No more than two lots may be consolidated in the Ballona Lagoon West, Ballona Lagoon (Grand Canal) East, Southeast Venice, Milwood, North Venice and Oxford Triangle neighborhoods and on walk streets. Lot consolidations of not more than three lots shall be permitted in the Oakwood and Marina Peninsula residential neighborhoods. Lot consolidations may be permitted only subject to the following limitations:*

i. No building or structure shall be constructed on what were more than two contiguous lots prior to lot consolidation with the exception of subterranean development that is entirely below street elevation.

ii. Building facades shall be varied and articulated to provide a pedestrian scale which results in consistency with neighboring structures on small lots. Such buildings shall provide habitable space on the ground floor, a ground level entrance and landscaping and windows fronting the street. No increase in the number of units shall result from the lot consolidation.

iii. Front porches, bays and balconies shall be provided to maximize

architectural variety.

Duplex/Multi-Family Residential

It is the intent of Venice LUP to maintain existing stable multi-family residential neighborhoods. In those stable neighborhoods characterized by a mix of densities and dwelling types, permitted densities may be reduced to levels consistent with the character of the entire area in order to minimize impacts on infrastructure, services, and to maintain or enhance the residents' quality of life. The loss of potential units in these locations can be offset by the provision of new housing opportunities via bonuses for the replacement of affordable housing and in mixed-use development.

Policy I. A. 5. Preserve and Protect Stable Multi-Family

Neighborhoods. *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.*

Policy I. A. 6. Multi-Family Residential - Low Medium I Density.

Accommodate the development of duplexes and multi-family dwelling units in the areas designated as "Multiple Family Residential" and "Low Medium I" 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.

Southeast Venice and Milwood

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

Density: One unit per 2,500 square feet of lot area. Lots smaller than 5,000 square feet are limited to a maximum density of two units per lot.

Replacement Units/Bonus Density: Lots greater than 5,000 square feet can add extra density at the rate of one unit for each 2,000 square feet in excess of 5,000 square feet in lot area if the unit is a replacement affordable unit reserved for low and very low income persons. (See LUP Policies I.A.9 through I.A.16).

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 25 feet for buildings with flat roofs, or 30 feet for buildings with stepped back or varied rooflines. (See LUP Policy I.A.1

and LUP Height Exhibits 13-16).

Policy I. A. 7. Multi-family Residential - Low Medium II Density.

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.

From: [Vaughn, Shannon@Coastal](mailto:Vaughn,Shannon@Coastal)
To: [Vaughn, Shannon@Coastal](mailto:Vaughn,Shannon@Coastal)
Subject: FW: Support of Appeal No. 5-VEN-25-0071
Date: Monday, March 9, 2026 2:25:54 PM
Attachments: [Appeal Support Letter 5-VEN-25-0071.pdf](#)

-----Original Message-----

From: Anne Marie Burke <amb@annemarieburke.com>
Sent: Friday, March 6, 2026 6:30 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>; SouthCoast@Coastal <SouthCoast@coastal.ca.gov>
Cc: aandasayyes@gmail.com
Subject: Support of Appeal No. 5-VEN-25-0071

[You don't often get email from amb@annemarieburke.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Commissioners,

Please find the attached letter in support of Appeal No. 5-VEN-25-0071

Thank you,

Anne Marie Burke

March 6, 2026

To:

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

From:

Anne Marie Burke & Anthony Byrnes
631 Sunset Avenue
Venice, CA 90291

Honorable Commissioners,

Re: Support for Appeal of Coastal Development Permit – Appeal No. 5-VEN-25-0071 | 657 Sunset Avenue, Venice, CA 90291

We are writing to express our strong support for the appeal filed by Dr. Naomi Nightingale and Margaret Molloy regarding the Coastal Development Permit for the proposed four-story, 25-unit apartment building at 657 Sunset Avenue, Venice. We are residents of Sunset Avenue and live just steps from this site. This project would directly and materially affect our daily lives and the character of the block we call home.

The proposed building — nearly 49 feet tall and more than triple the density allowed under current zoning — would be the only structure of its kind on Sunset Avenue between Main Street and Lincoln Boulevard. Our block is almost entirely one- and two-story homes. We see this streetscape every day. The scale of this project is not an abstraction to us; it would cast a literal shadow over a neighborhood defined by its low-rise, residential character.

We fully support the appellants' argument that this project is inconsistent with the California Coastal Act, the certified Venice Land Use Plan, and the Venice Coastal Zone Specific Plan. Beyond the legal grounds, we can speak plainly to the community impact: parking on our street is already extremely difficult, and adding 25 units with only 11 spaces will make it worse for residents and coastal visitors alike. The two street trees were removed by the property owner long before any permit approval was granted — a troubling fait accompli that should not be rewarded with after-the-fact authorization. And the demolition of existing housing in a historically Black neighborhood — without meaningful replacement of affordable units — raises serious concerns about displacement that the Commission has rightly recognized as a coastal resource issue.

I respectfully urge the Commission to accept jurisdiction, grant this appeal, and require that any project on this site be redesigned to respect the scale, character, and community fabric of Oakwood.

Sincerely,

Anne Marie Burke & Anthony Byrnes
631 Sunset Avenue
Venice, CA 90291
aandasayyes@gmail.com