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All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

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**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

2419 Ocean Front Walk Venice

External



Inbox x



Daniel Brookman <dannyboy96@aol.com>

5:29 PM (3 hours ago)



to DANNY, me ▼

Addendum to objections

The building is already higher than nearly all adjacent buildings.

The proposed variance would seriously obscure and obliterate the views for most of 25th Av, and adjacent streets.

There are no other structures in over 10 years that have been allowed to go higher.

The building has already exceeded permitted variances. This according to numerous LA Building inspectors over the last decade. Including an additional living structure on the roof.

Additional parking is non-existent. All street parking has been taken up in the 6+ years by builders and various other subs working on this project since before the pandemic.

Most of the beach adjacent structures were built before mandated parking spaces causing many of local residents to find limited street parking every day, not to mention all the weekends and beach visitors needing to park.

The applicant has given false and misleading statements at previous hearings including a recitation of rampant crime from homeless individuals requiring the need for higher fences on this property alone. In addition to gobbling up the few public parking places, the prolonged building construction has impacted pedestrian ingress to the beaches as well.

Although providing some parking for tenant residents, any visitors would have to park on the street thereby exacerbating congestion.

As mentioned, this monstrosity has been constructed with no regard for its surroundings including local long time residents and property owners.

I would urge a cessation on any further building and permits being issued until a thorough inspection of the project be conducted with an eye on non-conforming and code violative issues be addressed.

Daniel Brookman Esq

State Bar # 53228

Cell 310-428-1948

March 3, 2025

Dear Area Planning Commission,

We thank staff for their work and support on several requested entitlements. While we disagree with the denial recommendations, we want to reaffirm our shared commitment to promoting development that invests in the community while protecting it through the LAMC and Specific Plan. This project is not just about a building, but about enhancing the community and its quality of life.

The LAMC and Specific Plan were written on an area-wide basis. They did not consider unique individual characteristics of a specific property or dynamic changes in the economy and use of land. Specific Plan Exceptions and Zoning Administrator Adjustments are permissions to depart from the literal enforcement of a zoning ordinance to allow a property to be used in a manner otherwise not permitted if the spirit of the ordinance is observed and substantial justice is done without detrimental impacts to the community.

In this instance, Ms. Cummins purchased a rundown building and transformed it into a modern architectural marvel. The building is a significant visual enhancement, incorporating features such as higher walls, an enclosure entry cover, and cover over the trash area and opening to the garage. These features mitigate noise, visual, waste, and safety impacts caused by the site's location in a high pedestrian traffic area. The south side of the property along 25th Avenue has been transformed into a staging area for large tour groups, with the occasional use of a bullhorn to corral the tourists. Homelessness has added additional impacts, and beach goers use 25th Avenue to park their motorcycles, bikes, and e-scooters.

In this instance, staff's denial recommendations are based on a perceived "fortress-like structure inconsistent with enhancing the pedestrian experience as it relates to coastal access" and an "increase in the impervious area on a lot nearly built-out."

On March 5, 2025, we will present visuals that demonstrate the negligible impacts of adding one foot to the existing transparent wall along the frontage (amended from two-feet), constructing a transparent entry enclosure, and covering the trash area and garage opening, which is not visible because it is no higher than the existing wall.

We urge you to consider the attached bullet points for key findings.

Thank you,

R. Nicolas Brown, AICP
SATT Representing the Applicant

SPECIFIC PLAN EXCEPTION FINDINGS

Pursuant to LAMC Section 11.5.7 F, a Specific Plan Exception to allow a front yard fence providing a maximum height of 7 feet, in lieu of 6 feet, as otherwise required by Section 10.F.4 of the Venice Coastal Zone Specific Plan.

- 1. That the strict application of the regulations of the specific plan to the subject property would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan.**
 - Pursuant to the Specific Plan, a 6-foot-tall solid wall is permitted if the setback is one foot. The applicant intends to maintain the 3 ½ foot solid wall and construct a transparent screen above it.
 - Active, transparent ground floors are key to a pleasant sidewalk experience. Using transparent material above the existing 3 ½ solid wall is intended to preserve views and will not increase the building's scale and mass.
 - One additional foot above the by-right 6 feet prevents precipitation from entering the patio, a private open space area for the ground-floor unit. Otherwise, heavy downpours pool in the patio, and water wicks up the building, potentially damaging it and causing toxic mold.
 - The additional one-foot prevents trash from being thrown into the patio by passersby along Ocean Front Walk.
- 2. That there are exceptional circumstances or conditions applicable to the subject property involved or to the intended use or development of the subject property that do not apply generally to other property in the specific plan area.**
 - A recreation room at the ground level serves no purpose since open space is proposed on the roof. The room may be converted to an ADU to provide additional housing.
 - Generally, most properties along the boardwalk have high walls and/or overhangs that create private protected space.
 - Enclosing the patio will make the space more usable and protect the building from water damage.
- 3. That an exception from the specific plan is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other Property within the specific plan area in the same zone and vicinity but which, because of exceptional circumstances and practical difficulties or unnecessary hardships is denied to the Property in question.**
 - The applicant is seeking similar property rights for an enclosed private space as properties north of the site along Ocean Front Walls.
- 4. That the granting of an exception will not be detrimental to the public welfare or injurious to the Property or improvements adjacent to or in the vicinity of the subject property.**
 - There would be no harm contrary to the public interest (i.e., views, massing, scale) or to "private rights" (i.e., shade, shadow) because the additional foot will be transparent.

- No landscape is removed.
- The area within the patio consists of impervious surface constructed according to the Office of Zoning Administration's prior approval.

ZONING ADMINISTRATOR ADJUSTMENTS FINDINGS

Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment for an entryway arbor providing a maximum height of 13 feet, in lieu of 8 feet, as otherwise approved pursuant to case number DIR-2019-2528-CDP.

Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to cover the southerly side yard, in lieu of a side yard open to the sky, as otherwise required by LAMC Section 12.21 C.1(g).

1. While site characteristics or existing improvements make strict adherence to the zoning regulations impractical or infeasible, the Project nonetheless conforms to the intent of those regulations.

- The site is located in a high pedestrian traffic area. The south side of the property along 25th Avenue has been transformed into a staging area for large tour groups, with the occasional use of a bullhorn to corral the tourists. Additionally, beach goers use 25th Avenue to park their motorcycles, bikes, and e-scooters.
- The transparent enclosure is an attractive alternative to the existing post rails.
- Covering the pedestrian entrance protects individuals from the weather and provides privacy and security when entering the premises. Without the enclosed entryway, access to the garage is gained by stepping over the second-story walkway rail, dropping to the ground, then entering the garage.
- The cover over the trash area and garage opening eliminates visual blight and odors that affect residents in the upper levels.

2. In light of the Project as a whole including any mitigation measures imposed, the Project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the safety, public health, welfare and safety.

- The area behind the 8-foot wall consists of impervious surface constructed according to the Office of Zoning Administration's prior approval.
- Using transparent material for the entry enclosure is intended to preserve views and will not increase the building's scale and mass.
- The entry cover is consistent with existing transparent guardrails along the stairs and balconies.
- Approvals will not harm the community because the proposed structure consists of transparent material. The cover over the trash area and garage opening is not visible because it is below the existing wall.

3. **The environmental effects and appropriateness of materials, design, and location of any proposed fence or wall.**

- The entry cover is made of transparent material. As such, its design, location, and height will not impact shade/shadow, create visibility problems, or reduce access to light and air for adjoining public or private properties.
- The cover over the trash area and garage opening is not visible because it is below the existing wall.

DAY OF HEARING SUBMISSIONS

WLASNC Board FY 2020-2021

Jamie Keeton - Chair/ Organizational Rep.
Ron Migdal - Vice Chair/ At Large Rep.
Jay Handal - Treasurer/ Organizational Rep.
vacant- Secretary

Farzad Hassani - North West Rep.
Mollie Rudnick - North East Rep.
Arman Ghorbani - South East Rep.
vacant- South West Rep.
Galen Pindell - At Large Rep.
Ehsan Zahedani - At Large Rep.
Jean Shigematsu - At Large Rep.
Teri Temme - At Large Rep.
Pierre Tecon - At Large Rep.
Danilo Torro - Business Rep.
Diedre Greenway- Business Rep.
Jay Ross - Organizational Rep.



1645 Corinth Ave.
Los Angeles Calif. 90025
(310) 235-2070

E Mail: Info@WLANC.COM
www.WestLASawtelle.org

City Attorney
Planning Dept.

Re: Developers' financial interest / discretionary approvals

To the City,

At the Aug. 4, 2021, meeting of the West Los Angeles Sawtelle N.C., the Board of Directors voted 10-0-0, to requests that the City Council direct City Attorney Mike Feuer to provide a legal opinion as to whether or not the Planning Dept. and commissions have the legal right under State and City laws and ordinances to consider the financial interest of the developer when considering entitlements, and direct the Chair to submit Community Impact Statements.

Facts/Background:

1. WRAC Leadership Council approved at May meeting:
<https://westsidecouncils.com/motion/request-for-city-attorney-opinion-re-consideration-of-developers-financial-interest/>
2. LAMC Sec. 12.28.C.4(a) (Finding #1) requires a Finding that the project design must be "impractical or infeasible" unless the Adjustment is granted.
3. At the April 7, 2021, West LA Area Planning Commission, the Commissioners asked the Planning Dept. to clarify what "impractical or infeasible" project design means. The City Attorney at the hearing stated that the Findings are "silent" on this issue, and he concluded that considering financial impact on the developer is not prohibited –and thus allowed even though the Code does not explicitly state this.

Findings/Justifications:

1. Background: <https://westsidecouncils.com/wp-content/uploads/2021/05/Background-Information-Entitlements-Financial-Impact.pdf>
2. Does this also mean that other financial impacts like campaign contributions can be considered (even if they are reported to the Ethics Commission)?
3. One Commissioner stated that extra time and money to redesign plans and re-submit to plancheck is considered "project design." Most development professionals and planners disagree on this. Development and architecture professionals consider "design" to be engineered plans and graphics drafted and printed on paper. "Project design" is different from "project plancheck processing," which is what the Commissioner stated.
4. Conversely, the City would have specifically included "plancheck process processing" in the list of required Findings in LAMC Sec. 12.28.C.4, if they meant for the financial impact of additional re-design and plancheck processing to be considered, but they chose to exclude it.

5. Considering this exclusion to be the legal standard of "silent" is doubtful and questionable. It appears that in the context of variance applications, under California law financial impact is only considered if the applicant can clearly show that he/she was deprived of all economic benefit as a result of a unique hardship to the property in question, not because of a self-created hardship (e.g., a claim that the project doesn't "pencil out" for the developer unless the exception is granted).
6. In light of apparent confusion at the April 7th WLA APC hearing as to whether consideration of financial impact is allowed, the City Attorney should be directed to provide an opinion on whether or not the financial interest of the developer can legally be considered, including what is meant by financial impact, under what circumstances can financial impact be considered, and for what types of entitlement applications.

Ex parte communications: None disclosed by any committee members.

Disclosures and conflicts of interest: None disclosed by any committee members.

To government agencies: Only the Chair and designated Boardmembers may testify to public agencies on behalf of the West L.A. Sawtelle NC. The Board requests that the Council Office and private/non-profit entities do not testify or speculate on behalf of the NC.

/s/ Jamie L. Keeton

Jamie L. Keeton, Chair WLASNC

cc: Len Nguyen, Council District #11 (Len.Nguyen@LACity.org)

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CITY OF LOS ANGELES

JUL 02 2025

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JULY 2, 2025

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

PUBLIC HERING CITY OF LOS ANGELES PLANNING

RE: 2419 OCEAN FRONT WALK, VENICE, CA. 90291

WITHIN THE LAST MONTH THE COUPLE AND THEIR
THEIR TWO CHILDREN HAD THEIR WHITE PICK UP
TRUCK STOLEN FROM THEIR RENTAL PROPERTY AT 1348
MORNINGSIDE WAY, VENICE, CALIFORNIA 90291.

ANOTHER CRIME COMMITTED IN VENICE.

THIS PROPERTY BELONGS TO OUR FAMILY.

THIS COUPLE IS A VICTIM OF THE PALISADES FIRE.

THEIR NAMES ARE: KARIS AND ELAKE MALLEN AND
TWO CHILDREN.

A handwritten signature in black ink, appearing to read "J. Cusumano", is written over the bottom of the text block.

JULY 2, 2025

**PUBLIC HEARING PLANNING CITY OF LOS ANGELES
2419 OCEAN FRONT WALK, VENICE, CALIFORNIA 90291**

**C R E D E N T I A L S
JULIETTE CUMMINS SPONSEL**

USC BACHELOR OF FOREIGN SERVICE (DIPLOMACY)

USC SCHOOL OF LAW

Ph.D TRINE UNIVERSITY, ANGOLA, INDIANA

BUSINESS ADMINISTRATION

CALIFORNIA'S BROKER'S LICENSE (55 YEARS)

CONTRACTOR LICENSE 21

UNIVERSITY OF CALIFORNIA AT SANTA BARBARA –

U R B A N D E V E L O P E M E N T

C U M M I N S P R O P E R T I E S : S I N C E 9-1-1937

GRANDMOTHER-DAUGHTER-GRAND DAUGHTER

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CITY OF LOS ANGELES**

JUL 02 2025

**CITY PLANNING DEPT.
AREA PLANNING COMMISSION**

JUL 02 2025

Permission on my behalf to speak

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

From KJ <venicemom@mac.com>

Date Tue 7/1/2025 4:56 PM

To candj9001@cox.net <candj9001@cox.net>

Cc juliette <venicemom@mac.com>

FILE COPY

I, Juliette Cummins, the daughter am incapacitated with back issues and unable to be present at tomorrows meeting regarding our building at 2419 Ocean Front Walk Venice CA 90291

This is EXTREMELY important to me with regards to safety being ON THE SAND. The crime, the homeless, and catching strangers having sex in our building is disturbing. One Spanish man entered in the middle of the night and because my mother didn't react, and they just started at each other, she then threw him her wallet and he didn't rape her and ran out.

Recently, fire victims of the Palisades Fire, Fabian Fedida and his family moved out after only staying 5 months due to the safety issues. Someone broke into their unit (a shoeless homeless man) entered their living room with their children present and I was notified by the police of the incident. Another incident occurred weeks before and their nanny was attacked in the alley by a stranger and she drove away crying.

These tenants have now been victimized Twice! First the fires, and now the crazy people in that area and so they broke their lease and I'm currently not able to re-rent their unit as people don't want to rent in this area as one prospective tenant stated they too feared for their safety and considering we are just in front of the Venice canals where the two women were attacked last year and one of them died!

I am giving my mother my 15 minute of speaking time so she can act of my behalf.

This is extremely important that we are heard as we are trying to make this property as safe as possible and desperately need the plastic covering on the south side so the sand storms doesn't destroy the garage door chain and motor thus trapping tenants from exiting with their vehicles as the garage door won't open when it's covered with 8" of sand. Beach weather has HARSH CONDITIONS!

Kindly listen,



Juliette Cummins

310- 569-6129

Be Kind To Yourself! We only have one life !