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- **“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.
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# **SECONDARY SUBMISSIONS**

# Citizens Preserving Venice

DIR-2019-5903-CDP-MEL  
815 Angelus Place  
WLAAPC Hearing July 7, 2021  
**GRANT THE APPEAL**

July 5, 2021

Dear West L.A. Area Planning Commission,

Citizens Preserving Venice is a 501(c)3 organization with the goals of preserving the character and scale of Venice as a Special Coastal Community, including its history and its social, cultural, racial and economic diversity, and of stabilizing affordable housing in Venice. We advocate for the existing state and city laws that protect the coast and its affordable housing to be followed. Appeals have been the only tool available in pursuing our goals.

**You have the opportunity to rehear this appeal in consideration of all of the applicable provisions of the Coastal Act and the certified Land Use Plan (LUP). The City has erred and abused its discretion in approving this CDP as it is not in conformance with the applicable provisions of the Coastal Act and the LUP. Please uphold the appeal and deny the 815 Angelus project as proposed, for the reasons below. To wit:**

**STANDARD OF REVIEW:** A coastal development permit (CDP) is under the Coastal Commission's jurisdiction; thus, in your deliberations and findings, only the state Coastal Act and the LUP can be considered in making findings. To do otherwise is an error and abuse of discretion. Until the Local Coastal Program (LCP) is written and certified by the Coastal Commission, the Coastal Act is the standard of review and the LUP is to be followed. The West L.A. Area Planning Commission (Commission) would err in basing its decisions for a Venice Coastal Zone project on city regulations that have not been certified by the Coastal Commission. In fact, the City's CDP decisions are specifically NOT to be based on the City's non-certified regulations, which includes the VCZSP. The VCZSP is a city ordinance that was presented to and specifically not certified by the Coastal Commission as it does not conform with Chapter 3 of the Coastal Act. There is a significant difference between the VCZSP and the LUP, as only the LUP has the policy guidance that conforms with Coastal Act Section 30253(e) regarding Venice as a Special Coastal Community, which is a coastal resource to be protected (LUP Policies I.E.1., I.E.2., & I.E.3.). Contrary to what the "developer lobby" and its lawyers would like you to believe, projects in the Coastal Zone areas of the City are NOT "by right" if they simply comply with the LAMC and the VCZSP. The City's CDP decisions are discretionary and must be based on all of the coastal regulations included in the Coastal Act and LUP.

Also, it is incumbent upon you to apply the Coastal Zone regulations in this appeal determination in the same correct way the law was applied for the almost identical project, 720 Angelus (November 16, 2016, Case No: DIR-2016-750-CDP-MEL-1A).

**CHARACTER:** The City erred in its use of the LUP Policy I.E.1., I.E.2., and I.E.3. compatibility requirements with respect to character. Character has been defined by one expert as:

*"While the character of a neighborhood is not always easily defined, it is often made up of a collection of buildings, architectural styles, and, a similar scale and massing that, when combined, work together to help impart a specific look and feel of a place."*  
– Adrian Scott Fine, "Saving Neighborhood Character." LA Conservancy News. Fall 2014.

Style is not a determinant for character as defined in the LUP and a determination is not to be based on

whether one likes a design but rather on whether its character is compatible and fits into an existing neighborhood without an adverse individual or cumulative effect on the immediate neighborhood (the block), most commonly called the viewshed. (see definition below at Determining the Immediate Neighborhood, page 3)

The 800 block of Angelus is a small and narrow street. It can be characterized as made up of modest homes, mostly 1 story and in the more traditional building styles: arts and crafts, Spanish, and California bungalows. The entire neighborhood, Presidents Row, can also be characterized as such. 60% of the homes were built before 1930 and 36% between 1940-1950. The average size is 1,271 sf. As proposed, this two-story project with a sunken ground floor level will be 3,437 sf, 2.75 times the average of existing homes. This proposed project is not compatible with the mass, scale and character of the existing neighborhood.

Another Special Coastal Community, as designated by the Coastal Commission, is Carmel. The unique community and visual character of Carmel as exhibited by the style, scale and rich history of its architecture, together with its beaches, recreational amenities and its landscape, all combine to form the special character of Carmel, a character that is a separate, significant coastal resource worthy of protection in its own right. Carmel is a coastal resource known internationally as an outstanding visitor destination. Carmel is primarily a residential community and thus its residential development plays a key role in defining its special character. Carmel is distinctly recognized for its many small, well-crafted cottages. Large projects have great potential to alter Carmel's special community character, which is protected by the Coastal Act. Whether a proposed project detracts from Carmel's character because of a modern design, tree removal, proposed house size, or another characteristic must be determined. (3-02-008).

Venice's character is described in the LUP. Similar to Carmel, Venice is considered a "special coastal community" under the Coastal Act due to its unique architectural and visual character. Venice is recognized as an important visitor destination center on the coastline because of its cultural, historical and architectural heritage that is distinctive, as it provides opportunities for pedestrian and bicycle access for visitors to the coast, and as it adds to the visual attractiveness of the coast. Historically, Venice has attracted people from all social and ethnic groups. Venice remains 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. Diversity of lifestyle, income and culture typifies the Venice community, and its social diversity is to be protected as per the LUP. Venice's residents inhabit many of the small summer homes built on substandard lots along paved streets over canals and others live on substandard lots (many are less than 3,000 square feet in area). Because the residential lots are mainly relatively small and substandard, the general pattern of development is one of smaller houses. The subdivision patterns in Venice are also unique, the layout of which still reflects the original canal system and rail lines. The landscape—the trees of the Oakwood community and the gardens of the North Venice, Milwood and Lost Venice Canals Historic walk streets—is a part of its character. Venice is really a group of identifiable neighborhoods. Because Venice is primarily a residential community, the residential development in its unique neighborhoods plays a key role in defining the special character of the Venice community, as relates to the historic architectural and its small scale.

Votes against the appeal at the last Commission hearing were based on a misinterpretation of what character is when reviewing a CDP application. Statements such as: it's very attractive, it's a nice design, and it feels like it's okay do not reflect an understanding of the character of the block, an understanding of the coastal regulations, or an analysis of whether the proposed building is compatible with it.

**DETERMINING THE IMMEDIATE NEIGHBORHOOD:** At the June 2, 2021 Commission Hearing, Commissioner Margulies defined how to determine the area of analysis based on previous Commission deliberations. This area is most commonly called the Viewshed, which is defined as "the geographical area that is visible from a location. It includes all surrounding points that are in line-of-sight with that location and excludes points that are beyond the horizon or obstructed by terrain and other features (e.g., buildings, trees)." We have presented the Coastal Commission with research on many other cities' practices in defining the

existing neighborhood for purposes of such analyses. (see paper at page 4) The City erred in making findings based on irrelevant projects outside the immediate neighborhood.

**CUMULATIVE IMPACT:** In its deliberations, neither City Planning nor the Commission considered nor made findings regarding cumulative effects. Cumulative effect needs to be analyzed with respect to how an individual project would impact an existing neighborhood in consideration of past projects, other current projects, and probable future projects. (Coastal Act Section 30105.5) The Appellants, using this definition, showed that this project, should it be built, would result in a significant adverse impact for this sensitive neighborhood. (see CPV letter of June 16, 2021, at page 5) An analysis of past projects, other current projects (there are already two applications for new development in this immediate neighborhood) and probable future projects must be a part of your deliberation and determination.

*“Presidents Row is a particularly sensitive area with a character defined by its predominately single-story homes built before the annexation of Venice to L.A. As speculators, developers and wide-eyed architects cruise the neighborhoods to suss out undeveloped properties to ravage and destroy, they will surely come upon this neighborhood. And they have. Already there are at least 2-3 applications for similar projects in the pipeline. If a proper Cumulative Impact Study were done, as required, the city would have seen that the loss of this home would cause a significant adverse impact and result in more of these large out of character projects.”* (public comment, June 16, 2021 by Sue Kaplan)

The cumulative effects analysis requirement is in Coastal Act Section 30250, and it **must** be considered when making a determination on individual residential projects. That was confirmed last year by two Superior Court judges who revoked CDPs approved by the Commission for failure to do the cumulative impact analyses. The Court’s decisions have been acknowledged by the Coastal Commission and made part of its subsequent reports and findings.

The Appellants and others provided substantial evidence showing that through a correct cumulative impact analysis it would be determined that this project could and would result in a significant adverse impact.

This is not a matter for a “legislative body.” This is an appeal hearing by a quasi-judicial body, which has the responsibility to determine whether the City CDP findings are in error and whether the decision maker abused its discretion. The applicant and community members have provided substantial evidence that the city’s findings are incomplete and erroneous and that the decision maker’s conclusions are an abuse of discretion. Planning Staff has also abused its discretion by not considering the applicable provisions of the Coastal Act and the LUP.

In addition, please be mindful that Coastal Act Section 30009 states that the Coastal Act must be liberally construed to accomplish its purposes and objectives.

We implore you to uphold the appeal and deny this project.

Sincerely,

Sue Kaplan, President, on behalf of  
Citizens Preserving Venice

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Citizens Preserving Venice (CPV), a nonprofit 501c(3), founded as a group dedicated to preserving and protecting the character and scale of Venice as a Special Coastal Community. We work with the Venice community preserving the history, including the social, cultural and economic diversity, and protecting affordable housing by promoting healthy growth throughout Venice.

*“While the character of a neighborhood is not always easily defined, it is often made up of a collection of buildings, architectural styles, and a similar scale and massing that, when combined, work together to help impart a specific look and feel of a place.” – Adrian Scott Fine, “Saving Neighborhood Character.” LA Conservancy News. Fall 2014.*

Neighborhood Character has become an important planning tool in determining appropriate development. Though at first thought, it may seem to be a discretionary judgment, the Mass, Scale and Character Committee of the VNC found that there are measurements that can quantified and define a neighborhood.

Another concern is what constitutes a neighborhood. Based on comparisons of community plans, most city planning guidelines use the block as the basis for examination and review. It is felt that all the features and elements that define the character would be found in that finite collection of buildings. Further, over time character development does change at different manners and different features would shape the character differently between even adjacent blocks.

The Mass, Scale and Character based their definition on the Venice Specific Plan, The CERTIFIED Venice Local Land Use Plan and the study of other California city plans. Many were even more restrictive than the VSP.

The following plans were looked at and we based our definition on their conclusions:

1. Victoria, Australia: “In most cases, about five sites or buildings up and down the street, across the street and behind the site in question should be sufficient to identify the features of the neighbourhood that should influence the design. However, sometimes it may be necessary to look further than this, depending upon the individual circumstances of the site and the neighbourhood.
2. New York City: “The proposed building may not affect the character of the ends of the block but may affect the mid-block portion. Therefore, it may be appropriate for the study area to focus on the midblocks. Considering a study area that is too large would dilute the intensity of the effects.
3. Summerland, Santa Barbara: “These illustrations indicate how a building or structure relates to its immediate neighbors and other buildings on the block and across the street. Buildings on the same block face are analyzed.”
4. San Francisco: “buildings must be designed to be compatible with the scale, patterns and architectural features of surrounding buildings, drawing from elements that are common to the block.” GUIDELINE: In areas with a defined visual character, design buildings to be compatible with the patterns and architectural features of surrounding buildings. On some block faces, there is a strong visual character defined by buildings with compatible siting, form, proportions, texture and architectural details. On other blocks, building forms and architectural character are more varied, yet the buildings still have a unified character. In these situations, buildings must be designed to be compatible with the scale, patterns and architectural features of surrounding buildings, drawing from elements that are common to the block.
5. Redondo Beach: “Neighborhood Design. Each site shall contribute to neighborhood character including the type of forest resources present, the character of the street, the response to local topography and the treatment of open space resources such as setbacks and landscaping. It is intended by this objective that diversity in architecture be encouraged while preserving the broader elements of community design that characterize the streetscape within each neighborhood.”

“Blockscape/ Blockface - The properties abutting on one side of a street and lying between the two nearest intersecting or intercepting streets, or nearest intersecting or intercepting street and railroad right-of-way, unsubdivided land, watercourse, or city boundary.”

6. Alameda County: “ ‘Block’ means that property abutting one side of a street or lane which lies between the two nearest intersecting or intercepting streets, or between the nearest such cross street and an intersecting railroad right-of-way, watercourse, body of water, or the end of the street or lane.’ ”

Letter submitted by CPV on behalf of Appellants on June 14, 2021:

14 June 2021

DIR-2019-5903-CDP-MEL  
815 Angelus Place  
WLAAPC Hearing 16 June 2021

## **GRANT THE APPEAL**

Dear West L.A. Area Planning Commission,

Citizens Preserving Venice is a 501(c)3 organization with the goals of preserving the character and scale of Venice as a Special Coastal Community, including its history and its social, cultural, racial and economic diversity, and of stabilizing affordable housing in Venice. We are not activists. Rather, we advocate for the coastal and city laws that protect the coast and its affordable housing to be followed. Appeals have been our most effective tool in pursuing our goals.

The City has erred and abused its discretion in approving this CDP. Please uphold the appeal and deny the 815 Angelus project as proposed, for the reasons listed below.

1. There is a clear precedential decision by the West L.A. Area Planning Commission (WLAAPC), denying a project that was 13% smaller than 815 Angelus, just 9 houses (1/2 block) away, on the same street, in the same neighborhood.

At the November 16, 2016 appeal hearing of the project for 720 Angelus, the WLAAPC upheld the appeal and overturned the Planning Director's approval of a CDP for the project. The 720 Angelus project proposed demolition of a 1,176 square foot single-family dwelling and accessory structure to construct a two-story, 3,044 square foot single-family dwelling with a maximum building height of 28'. The WLAAPC found that:

- the development is not in conformity with Chapter 3 of the California Coastal Act of 1976 and would be out of scale in contrast to the single-family dwellings on Angelus Place,
- the proposed project conflicts with Section 30251 of the California Coastal Act, which states the importance of preserving and protecting the scenic and visual qualities of the coastal areas with regards to the character, mass and scale as part of the scenic qualities of the Venice Coastal Zone, and it would create an adverse cumulative impact on this special coastal community,
- the development will prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976,
- policy I.A.2 of the certified LUP states that developments in stable single-family residential neighborhoods must 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, and

- approval of projects that are out-of-character with the surrounding community sets a bad precedent and creates a cumulative impact on the neighborhood, making developing a Local Coastal Program for Venice impossible to be in conformity with Chapter 3 of the Coastal Act.

The 815 Angelus project is proposed to be 3,437 square feet, 393 square feet (13%) larger than the one at 720 Angelus that you previously denied.

**Please consistently, correctly apply the coastal zone laws in this appeal determination as you did for the almost identical project, 720 Angelus. Contrary to what the developer lobby and its lawyers would like you to believe, these projects in the Coastal Zone areas of the City are NOT by right if they comply with the LAMC and Venice Coastal Zone Specific Plan (VCZSP), which is a City ordinance that was never certified by the Coastal Commission as it did not conform with Chapter 3 of the Coastal Act. The City's CDP decisions are discretionary and must be based on all of the coastal regulations included in the Coastal Act and certified Venice Local Coastal Program Land Use Plan (LUP); the City's CDP decisions are specifically NOT to be based on the City's non-certified regulations (which include the VCZSP).**

2. The findings are in error as they omit consideration of Venice's status as a Special Coastal Community, which is required by Coastal Act Section 30253(e) and LUP Policy Section I.E.

Special Coastal Community is defined in the LUP (page I-16) as:

*"An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast."* (underline added)

The Venice Coastal Zone is in fact a Special Coastal Community, as designated in the original Coastal Plan, which preceded and formed the basis for the Coastal Act, and as designated by the Coastal Commission when it certified the LUP, which means that additional protections are necessary to protect the scale and character of Venice's unique neighborhoods, as per Coastal Act Section 30253(e) and the LUP guidance in Policies I.E.1., I.E.2. and I.E.3.

In making Finding 1 that the development is in conformity with Chapter 3 of the Coastal Act, the City makes no mention of protecting the Special Coastal Community of Venice. The City errs and abuses its discretion as it only cites Coastal Act Chapter 3 Section 30253(e) regarding special communities but does not analyze and make a finding re. conformance of the project with this key Chapter 3 section.

Thus, with respect to Venice as a Special Coastal Community, the proposed project does not conform with the requirements of:

Coastal Act Section 30253(e) Minimization of adverse impacts

Sections 58 (c) and (e) of the 1975 Coastal Plan

LUP Policy I.E.1 Preservation of Venice as a Special Coastal Community

LUP Policy I.E.2. Scale  
LUP Policy I.E.3. Architecture

3. The project is not compatible with the mass, scale and character of the surrounding neighborhood.

Facts/evidence:

- The 800 block of Angelus consists of 26 lots.
- 21/26 (81%) are single story, average 1,174 sq ft, with a FAR of .28.
- 3/26 (12%) have a partial second story, average 1,426 sq ft, with a FAR of .34.
- 2/26 (7%) are 2 story, average 2,630 sq ft, with a FAR of .63.
- The average of all 25 homes on the block is 1,271 sf.
- The existing structure at 815 Angelus is 1,066 sf, on a 4,200 sq ft lot, a FAR of .25.
- The proposed project is 3,437 sf, with a FAR of .82, 3.3 times larger than the FAR for the existing home.
- The proposed home would be by far the biggest home on the block.

The neighborhood that includes Angelus Place is a special and unique neighborhood. The street is 24 feet wide, creating a closeness not felt by people living on surrounding streets which are 10 to 16 feet wider. The lots are small and substandard.

Also, the properties cited in the CDP that are used as examples of previous zoning actions and Coastal Commission actions are not located on Angelus Place and they do not represent valid comparisons. In addition, the fact that the WLAAPC action for 720 Angelus (see 1. above) was not considered by the decision maker is a glaring omission and error. The projects used in the City's determination are on streets that are approximately 30 to 50 feet wide, or that are fronting the Venice Canals, which are much wider, or are situated on a walk street. This difference in surrounding spaces creates a different character to the location. Another difference is that the streets used in the determination analysis have been developed either fully with 2 or 3 story houses or have multiple mature 2-3 story houses.

In addition, City Planning has heard public testimony from community members that the proposed project would be grossly incompatible with the scale and character of the single-family dwellings in the surrounding neighborhood on Angelus Place.

However, the CDP determination and the Staff response to the appeal are full of conclusory statements, with no logic between the evidence in the neighborhood and their conclusions.

The project is not visually compatible with the character of surrounding areas, as required by Coastal Act Section 30251 Scenic and visual qualities.

This project does not respect the scale and character of community development, is not of a scale compatible with the community with respect to bulk, height, buffer and setback, and does not respect the scale, massing and landscape of the existing residential neighborhood, as required by LUP Policy Preservation of Venice as a Special Coastal Community I.E.2.

The project does not maintain the neighborhood scale and massing as required by LUP Policy Preservation of Venice as a Special Coastal Community I.E.3. Architecture.

Thus, the findings that the project conforms with the standard of review, the Coastal Act, and its guidance, the LUP, are in error and the project cannot be approved; thus, the decision maker has abused its discretion in approved a CDP for the project.

4. The project would cause a significant adverse cumulative impact to the character and scale of the neighborhood and to Venice as a Special Coastal Community, a Coastal Resource to be protected.

The City errs as it does not consider the cumulative effects of the project on coastal resources, which is required for all projects in the Coastal Zone (Coastal Act Sections 30105.5 and 30250). The Coastal Act requires that new development not have a significant adverse impact, either individually or cumulatively, on coastal resources. The Coastal Commission designated Venice as a Special Coastal Community and a Coastal Resource to be protected against projects of this size and scale. The City must do an analysis of cumulative impacts on the community character and the scale of this unique coastal neighborhood by considering the impacts of past development in conjunction with current and probable future projects.

As noted in these excerpts from recent judicial orders below, a cumulative impacts analysis is required:

**Excerpts from Order of Hon. Mitchell Beckloff, Judge of the Superior Court of California Granting Petition for Writ of Mandate in Part, September 15, 2020 (Case No: 19STCP03010)**--*Petitioner argues the Coastal Commission "abused its discretion by failing to perform a cumulative impact analysis of the...Project." ...The Commission does not take issue with Petitioners' position a cumulative impacts analysis is required under the law....The Commission admitted it did not consider cumulative impacts in its original staff report. The Commission's discussion concerning previously approved projects and the City's ability to prepare a Local Coastal Program (LCP) is insufficient in the context of Public Resources Code section 30250, subdivision (a). While the Commission must consider prejudice to the City's creation of a LCP, the statute requires a determination that the new development "will not have significant adverse effects, either individually or cumulatively, on coastal resources." (Pub. Res. Code 30250, subd. (a).) The Commission's single reference to previously approved projects does not comply with its obligation under the statute. It does not address "the effects of other current projects, and the effects of probable future projects."....Finally, that the Project in the Commission's view is compatible with community character and size of "surrounding structures" does not address "the effects of other current projects, and the effects of probable future projects." (Pub. Res. Code 30105.5.) ... Here, by statute a cumulative effects analysis requires consideration of "the effects of other current projects, and the effects of probable future projects." (Pub. Res. Code 30105.5.) ...*

**Regarding subjective judgements, the Order goes on to say:***...Petitioner contends decisions about character involve "subjective judgment on the project's appropriateness" for the neighborhood. The subjective nature of "compatibility of the project with the surrounding area ..." is supported by caselaw. (Reddell v. California Coastal Com. (2009) 180 Cal.App.4th 956, 970.) The California Coastal Plan adopted in 1972 also recognizes "certain communities and neighborhoods have special*

*cultural, historical, architectural, and aesthetic qualities that are as important to the coastal zone as are its natural resources.” (Petitioners’ RJN, Ex. C p. 20.) The plain meaning of “character” is “the aggregate of features and traits that form the individual nature of some person or thing.” (Random House, Webster’s Desk Dictionary (1983) p. 152.) ...*

**Excerpts from Order of Hon. James C. Chalfant, Judge of the Superior Court of California, Granting Petition for Writ of Mandate, May 28, 2019 (Case**

**No: BS170522)** *The Coastal Act requires a cumulative impact analysis: “[T]he incremental effects of an individual project shall be reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” 30105.5... The staff report’s analysis failed to address the Project’s cumulative impact with other past, present, and future projects on the community and on the City’s ability to certify a LCP... The Commission therefore principally compares new projects with those it has previously approved rather than to the small homes originally built decades earlier. The Commission’s approach is practical and appropriate, but it runs the risk of changing the character of the community as Petitioners argue... the “foot in the door” and precedential approval of a larger project can lead to a set of approvals that cumulatively change the nature of the neighborhood. The Commission should be sensitive to this fact. It was obligated by section 30105.5 to address the Project’s cumulative impact and failed to do so... The Commission failed to proceed in the manner required by law and abused its discretion by not considering the Project’s cumulative impact with other approved projects on the character of the neighborhood and the City’s ability to certify a LCP. The petition for writ of mandate is granted.*

Every Coastal Commission decision since the above summarized Court orders were issued has contained a cumulative impacts analysis and references Coastal Act Section 30250 as requiring one:  
See page 11: <https://documents.coastal.ca.gov/reports/2019/6/W11c/w11c-6-2019-report.pdf>  
See page 10: <https://documents.coastal.ca.gov/reports/2020/2/W20a&21a/w20a&21a-2-2020-report.pdf>  
See page 13: <https://documents.coastal.ca.gov/reports/2020/9/Th18b/Th18b-9-2020-report.pdf>  
See pages 10 & 14: <https://documents.coastal.ca.gov/reports/2020/10/Th12c/Th12c-10-2020-report.pdf>  
See pages 8-9 & 14: <https://documents.coastal.ca.gov/reports/2020/11/W14a/W14a-11-2020-report.pdf>  
See page 16: <https://documents.coastal.ca.gov/reports/2021/3/Th12a/Th12a-3-2021-report.pdf>

The City must do the same and consider the cumulative impact of this project when issuing a City CDP. But City Planning continues to err on these key points in spite of Court decisions and prior decisions of the Coastal Commission that make it very clear that a cumulative impacts analysis is required.

The neighborhood’s largest 2 story house is 2,937 sq ft and the average of both of the only 2 story houses on the block is 2,630 sq ft. The increase from the average 2-story building size of 2,630 sq ft to a 3,437 sq ft new home is 31 %, or 1.3 times the size of the existing average of the existing 2-story homes. The increase from the neighborhood’s largest 2-story home, of 2,937 sq ft, is 17%. In addition, the proposed home would be 2.6 times the size of the 1,315 sq ft average of all 26 homes on the block. The effect of allowing such a large precedent would likely lead to future requests for building projects that are even larger and more incompatible with the established neighborhood’s mass, scale, and character, which would cause a significant adverse cumulative impact on community character and scale/mass of the neighborhood. Thus, the project must be denied.

Also, the City errs in Finding 1. as it does not recognize that the Venice Coastal Zone has been designated by both the City and the Coastal Commission as a “Special Coastal Community” (as defined and designated in the LUP) and must be preserved and protected from projects like this that would cause a significant adverse cumulative impact on the relatively small scale and unique community character of the Venice Coastal Zone. Again, the project must be denied.

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This is not a matter for a “legislative body.” This is an appeal hearing by a quasi-judicial body, which has the responsibility to determine whether the City CDP findings are in error and whether the decision maker abused its discretion. The applicant and community members have provided substantial evidence that the findings are incomplete and erroneous and that the decision maker’s conclusions are an abuse of discretion. Please uphold the appeal and deny this project.

Sincerely,

Sue Kapan, President  
Citizens Preserving Venice

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Citizens Preserving Venice (CPV), a nonprofit 501c(3), founded as a group dedicated to preserving and protecting the character and scale of Venice as a Special Coastal Community. We work with the Venice community preserving the history, including the social, cultural and economic diversity, and protecting affordable housing by promoting healthy growth throughout Venice.



Planning APC West LA &lt;apcwestla@lacity.org&gt;

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**Re: 7/7/2021 Appeal Hearing of 815 Angelus Continued. Case #: DIR-2019-5903-CDP-MEL**

1 message

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**Andree Armand** <Andree@functionalfoodsusa.com>  
To: "apcwestla@lacity.org" <apcwestla@lacity.org>

Sat, Jul 3, 2021 at 8:12 PM

**Attention James Williams**

Dear Mr. Williams,

I am opposed to this project as proposed because it is too disproportionately large for the neighborhood. One long time neighbor Family has already moved away because the new construction would be hovering over and looking into their property, taking away their privacy. Not only will they experience a loss of privacy, but a loss of light and openness.

I am not opposed to persons adding on to their dwelling but how about consideration for space, light and privacy of neighbors? How about keeping in line with the character of the neighborhood? Why do we need Macmansions that are out of line with smaller residences. If they want a Macmansion, there are plenty of other neighborhoods where they can be amongst homes of similar size.

Please do not grant permits for this giant neighborhood and quality of life killer.

Mr. Williams, please rule in favor of our appeal, please.

Thank you for your consideration.

Andrée Armand

808 Crestmoore Place

Venice, CA 90291

# **DAY OF HEARING SUBMISSIONS**



Planning APC West LA <apcwestla@lacity.org>

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## James Williams

1 message

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**Jennifer Luke** <jlukeme@gmail.com>  
To: apcwestla@lacity.org

Tue, Jul 6, 2021 at 1:36 PM

Case #: DIR-2019-5903-CDP-MEL

For the appeal.

Please, as 50+ neighbors signed against this size, scope of structure. It's nearly 3 times bigger than any other house on this narrow one way street. It's solely for development and making money.

Thank you! Jen Luke

Sent from my iPhone