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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 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

FILE COPY

RECEIVED
CITY OF LOS ANGELES

MAR 05 2025

PLANNING DEPARTMENT-CASE # APCW-2021-4850-COP-SPE-SPP-ZAA-E-MARCH 5
2025-2419 OCEAN FRONT WALK VENICE 90291

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

THIS PARTICULAR PROPERTY SITE IS LOCATED ON THE FIRST LINE OF PROPERTIES
FACING THE PACIFIC OCEAN, AND IS THEREFOR EXPOSED TO:

HIGH WINDS RUSHING WATERS PUBLIC ACCESS HOMELESS INDIVIDUALS
SECURITY THREATS

THIS PROPERTY NEEDS FURTHER PROTECTION FROM THE ABOVE ELEMENTS
BY GRANTING OUR REQUESTS FOR:

- 1) FRONT GLASS ENCLOSURE TO PREVENT INDIVIDUALS FROM CLIMING
OVER THE CONCRETE WALL AND GETTING INTO THE BEDROOM IN THE
RECREATION ROOM BY FORCING THE SLIDING DOORS OPEN, AND
FURTHER GIVING PROTECTION FROM WATER ENTERING THE
RECREATION ROOM
- 2) GLASS COVERING OVER THE 25TH AVENUE SIDE ENTRANCE DOOR/MAIL
BOXES, ETC. AND STAIRCASE UP TO THE ABOVE PLATFORM LANDING
- 3) PROTECTION FROM RAIN AND SAND ENTERING THE FIRST LANDING OF
THE BUILDING SINCE THERE IS NO PROTECTION BETWEEN THE 8'
CONCRETE FENCE AND BUILDING. WE NEED THIS ENCLOSURE IN THIS
AREA TO PREVENT WATER FROM ENTERING THE BUILDING AND
INDIVIDUALS FROM CLIMBING THE WALLS TO GET ACCESS TO
THE 1ST, 2ND, 3RD, AND 4TH FLOORS.

SEE PHOTOS

RESPECTFULLY SUBMITTED,

Juliette Marie Cummins, Trustee
THE CUMMINS GIFT TRUST

FILE COPY

Outlook

OFW Thick Sand in Garage

From Peter Aquino <peterdgreat1@yahoo.com>

Date Tue 3/4/2025 4:37 PM

To Juliette Cummins <candj9001@cox.net>

RECEIVED

CITY OF LOS ANGELES

MAR 05 2025

CITY PLANNING DEPT.
AREA PLANNING COMMISSION



SAND and WATER ENTERES FROM 25TH AVENUE AS A RESULT OF "NOT HAVE OVERHEAD CEILING"

TO PREVENT SAND and WATER FROM FLOODING, ETC. THE FIRST LEVEL OF THE BUILDING

WATER

SAND



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CITY OF LOS ANGELES

MAR 05 2025

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FILE COPY

COVERAGE FROM FRONT 8' WALL TO BUILDING TO PREVENT (1) SAND – (2) WATER GETTING INTO THE BUILDING