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VIA HAND DELIVERY

August 10, 2018

City of Los Angeles  
City Planning and Land Use Management Committee  
Attention: Zina H. Cheng  
200 North Spring Street, RM 272  
Los Angeles, CA 90012

cc: Honorable Jose Huizar  
Honorable Marqueece Harris-Dawson  
Honorable Mitchell Englander  
Honorable Bob Blumenfield  
Honorable Curren D. Price, Jr.  
Honorable Mike Bonin

RE: DIR-2012-3537-CDP-DB-SPR-MEL; TT-70786; ENV-2012-3536-MND-REC1  
Council File 18-0686 and 18-0686-S1

Honorable Committee:

I appreciate the opportunity to provide you with comments on a proposed project of significant importance to our community. I have lived in Playa Del Rey for over 21 years. I have lived in all different parts of Playa Del Rey as a renter and home owner including the beach front, Esplanade, on the coastal bluffs and on the East side of Pershing. I believe this gives me insight into how the project will affect a number of different parts of Playa Del Rey.

I would like to start by describing the area where the project is proposed to be built. I have provided a topographical picture for your reference. The project is located at the intersection of Culver and Vista del Mar and marked (1). You will see that the project is in a low bowl, a block from the Lagoon park and catty-corner across the street from a lot which abuts the Ballona wetlands. To orient you, I have also marked applicant's lot at 6819 Pacific (29 units proposed)(2)<sup>1</sup>, applicant's lot at 220 Culver (63 units plus pharmacy retail proposed at 60 feet tall)(3)<sup>2</sup>, a property at 6744-6750 Esplanade and 163-171 Argonaut Street which has twice now applied for permits to build a 14 unit, 56 foot tall, density bonus project (4), and the Del Rey Cleaners at 310 Culver, where the ground water is contaminated with PCE 540 feet from the project site. You will find this story is also replete with properties in lower Playa del Rey which

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<sup>1</sup> Initial Statement, Mitigated Negative Declaration ("IS/MND") pg. IV-131 at LEG 1951.

<sup>2</sup> IS/MND pg. IV-131 at LEG 1951 and Geocon Response to Soils Correction Letter dated April 14, 2011 LEG 2870-2875.

have been denied Coastal Development permits for 45 feet but are still not yet built and therefore likely to come back and ask for the new “character and scale” if this project is approved.



City of Los Angeles, Topographical Map

My primary reasons why the project should not be granted a coastal development permit are summarized in the visual tour of Playa del Rey below. The more technical arguments follow but the arguments are premised on what is different about Playa del Rey and the project location, and how this uniqueness relates to the Coastal Act.

This case is about coastal access and environmental justice. Building an under parked project, with overflow residential parking spilling out and absorbing Playa del Rey’s limited supply of free beach parking, will deny coastal access to those who cannot afford \$20 private parking or to pay to Uber to the beach. The Coastal Act stands for the proposition that the beach belongs to everyone and embodies the California State Constitutional mandate for public beach access. Playa del Rey provides a vital recreational space, the beach, for the whole City and tourist from all over the State and world. Everyone knows about Venice, but if you just want to go to the beach with your kids on a warm day, without watching someone juggle a chainsaw, Playa del Rey is the place. It’s easy to miss this point. So I thought pictures taken from the lifeguard tower straight out from Culver Boulevard, on the beach in Playa del Rey, facing North and South on July 7, 2018 at 4:40 p.m. would help. The community is also submitting a zip code survey of beach goers which shows that people from all over the City and beyond are using this beach.



Because this case will involve arguments about maintaining the “character and scale” of Playa del Rey as required by the Coastal Act, I have included pictures of the commercial district on Culver Boulevard in the blocks around the project site. In the pictures and a separate character and scale study of the commercial zone attached as Exhibit A, you will notice that the narrow lot frontages result in smaller buildings which lend themselves to “Mom & Pop” businesses. The area is a small scale, quaint beach community.



Corner of Vista del mar and Culver, Project is located where the arrow points—behind Bacari and across the street from the Shack



230 Culver- Closed since late 2014 or early 2015 and vacant as a result of failed lease negotiations with applicant





North Side of Culver from 203 to 309/315 Culver



193 Culver Boulevard- across the intersection from applicant's project



200 Culver Boulevard- applicant's historic building and Tanner's Coffee Shop





South Side of Culver directly across the street from applicant's project (143-185 Culver)



Café Milan (205 Culver)



Clean Aesthetic (323 Culver)

Character and scale is not just about height. It also involves building massing and bulk. Here the proposed Tentative Tract Map combines 14 parcels, including public property, into 1 lot encompassing nearly an acre. The lot assemblage eliminates set-backs which would otherwise apply, and creates a lot which enables a building which is out of scale and character with the adjacent commercial center buildings. A characteristic of the existing development in lower Playa del Rey in the commercial center is buildings on smaller lots with pure commercial and no set-backs or smaller scale residential development with set-backs. This character and scale derives from the small lot sizes. Both Google from the air and the City's Zimas system provide images which amply illustrate this pattern of development in the existing commercial center of Playa del Rey from which applicant's project is a vast departure.



This case involves blocking panoramic public views from locally declared and protected view spots with an oversized building. I thought you should see the view and then 3D models prepared by Jim Duhe of the project standing in the view from Montreal Street toward the beach and from the entrance to the public bike path and beach toward the coastal bluffs. Mr. Duhe has a degree in Environmental Design from Otis College and has been preparing building plans and 3D construction models for 20 years. I also included a few shots which will give you a sense of what the public will be losing forevermore in exchange for 8 affordable housing units.



Before Shot: Pre-project view Montreal Street and Vista del Mar

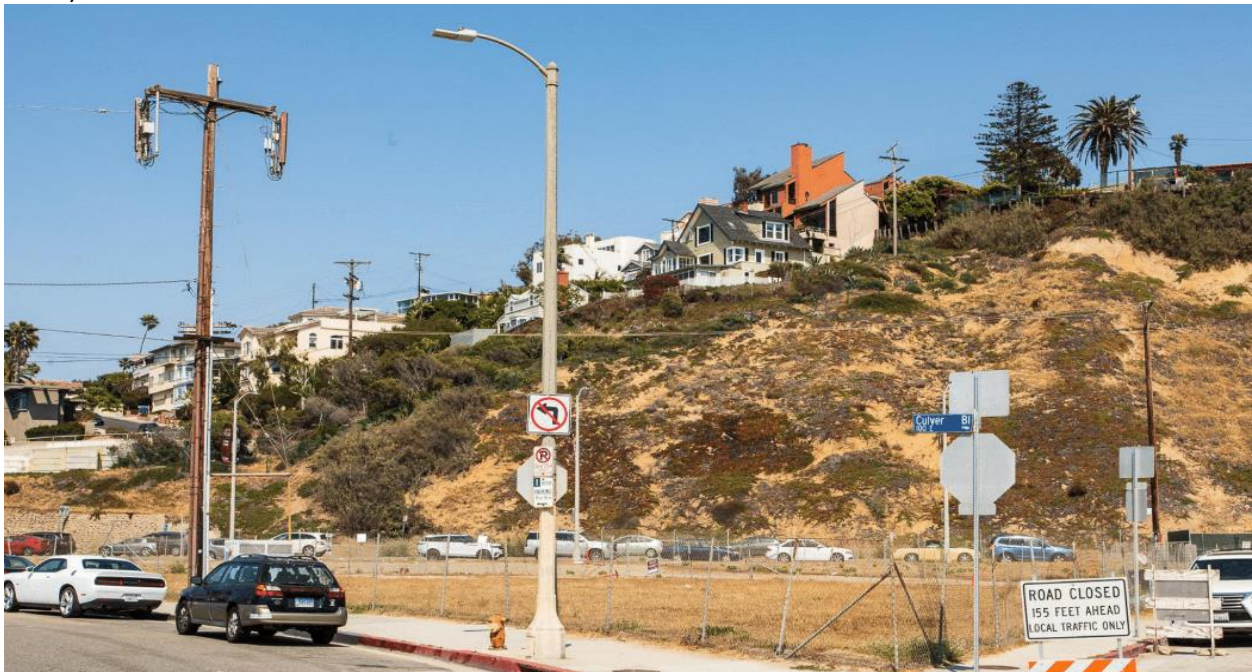


After Image: Post-project view Montreal Street and Vista del Mar (Duhe)





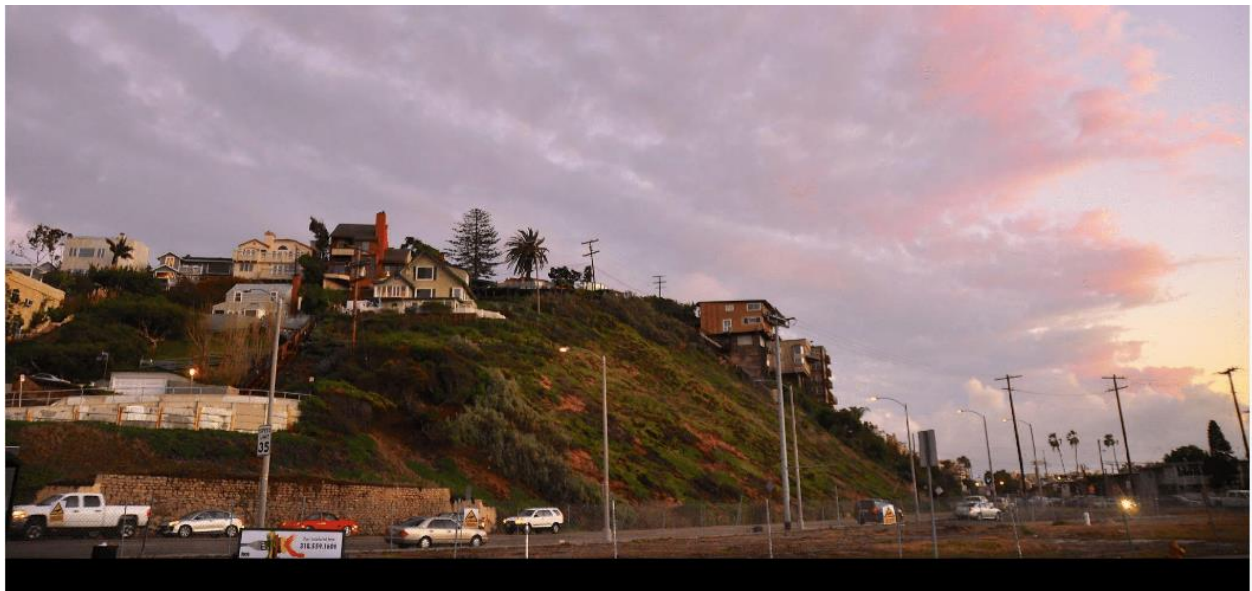
Montreal Street and Vista del Mar at Sunset (Ignore the Crane but note it's there)



Before Shot: Coastal Bluffs Pre-project from Culver and Pacific



After Image: Coastal Bluffs Post-project from Culver and Pacific (Duhe)



Coastal Bluffs: Across the project 138 Culver lot—yes they are beautiful



This case involves building a nearly acre wide subterranean parking garage in a neighborhood and at a location which is already flood prone. Applicant offers a theoretical preliminary flood report, which will be addressed below, but I thought you should see the real flooding over the course of multiple years to frame the discussion at the outset. The planning file below is full of flood pictures.



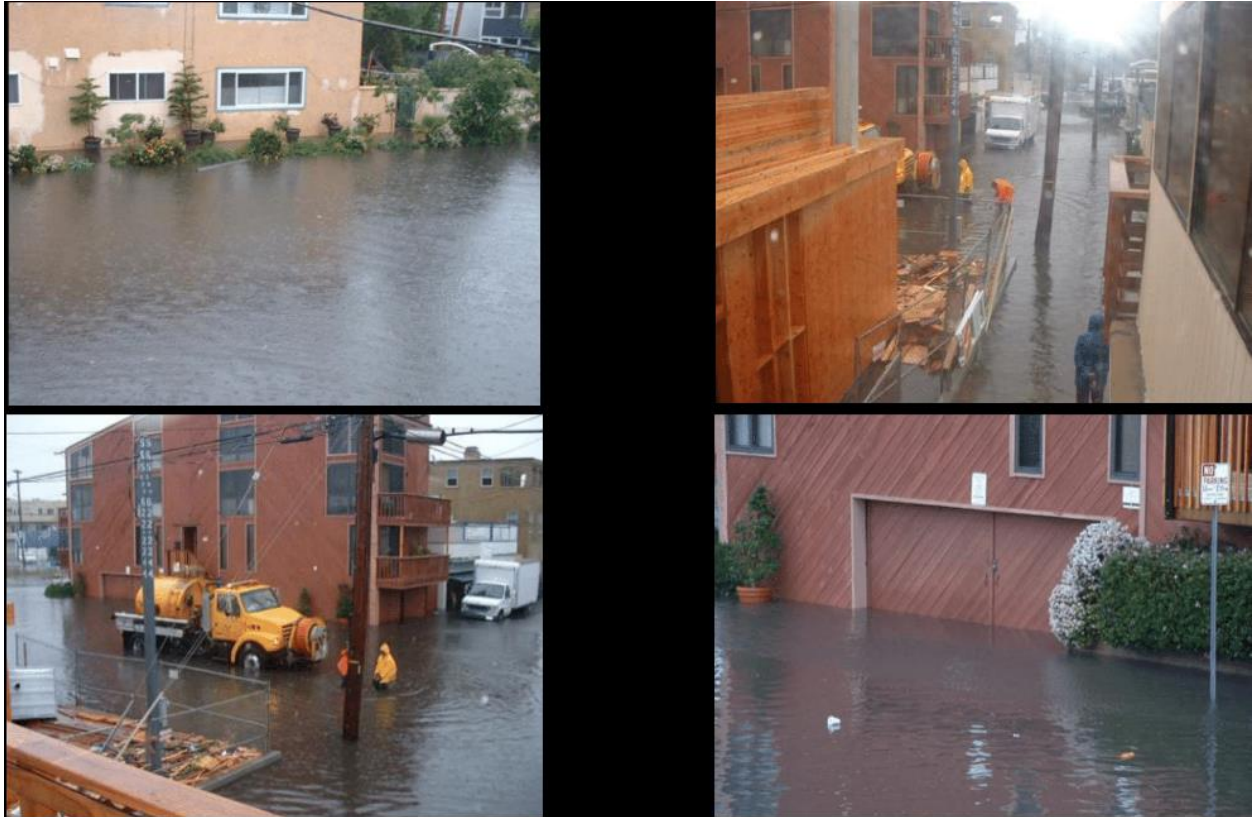
2014

Flood—Over Legado’s lot and down Vista del Mar Lane



2015 Flood—Mattress floating in City Approved Half Story Underground Garage





2016 Flood—Culver and Trolley Intersection less than a block from Legado’s lot

I would also like to provide a brief description of the proposed project as I understand it based on:

(1) the Director’s Determination dated March 16, 2018 (the “Director’s Determination”), the revised plans referenced as Exhibit A thereto dated variously February 5, 2018 for the cover and landscape and December 10, 2017 for the balance (the “Exhibit A Plans”)<sup>3</sup>,

(2) the Decision of the City Planning Commission dated July 19, 2018, together with the conditions and findings thereto (the “CPC TT Decision”), the Revised Tentative Tract Map No. 70786-REV stamp-dated April 17, 2017 (the “TT Map”) referenced in the CPC TT Determination, and

(3) the Initial Statement/Mitigated Negative Declaration for the project issued January 2014 (the “IS/MND”).

The project is a 4 story, 79,493 square-foot mixed-use development with 7,507 square feet of ground floor commercial (6,007 square feet of retail and 1,500 of restaurant), 72 dwelling units, and 123 parking spaces within the ground floor and one subterranean parking level. Please Note: This project is not seeking to use the additional density enabled by City and State density bonus law, to create more housing units. The project is using density bonus law to obtain incentives which will enable creation of lucrative, luxury housing at the beach. A project which used the

<sup>3</sup> We are left with the Director’s Determination dated March 16, 2018 as the arguably operative decision in this case as the City Planning Commission heard this case and did not reach a decision on the appeals regarding the Director’s Determination.

additional floor area ratio and height to create housing would be generating 103 units not 72.

This project is not about affordable housing; it is about gentrification in a neighborhood which already has vast stock of rent stabilized housing. In her June 17, 2018 letter, Vanessa Cabello presented the results of a study which established out of 350 buildings surveyed in lower Playa del Rey 204 had at least one rent stabilized unit. If you take a few of the biggest and add their units to the total you have no less than 304 rent stabilize units in lower Playa del Rey. Part of the reason this project has been so vehemently opposed by the community is that we know it is the lead-off hitter for a wave of gentrification and displacement, another Venice, and a net loss of affordable housing in the coastal zone.

The project has also requested a reversion to acreage in the TT Map which would merge into applicant's parcel:

- A 10-foot wide strip of land along Culver Boulevard;
- A variable width strip of land along Trolley Place "in excess of the 20 foot wide alley right of way";
- The 20-foot wide and variable width public right of way on Vista del Mar Lane; and
- A 5-foot wide strip of land along Vista del Mar.

The last paragraph on page F-7 of the CPC TT Decision states that the "Bureau of Engineering recommends that the proposed merger of 5-feet on Vista del Mar as shown on the Tentative Tract Map stamp dated April 17, 2017 be denied." At various other places, the CPC TT Decision discusses the mergers for Culver Boulevard, Trolley Place and Vista del Mar Lane but omits discussion of the merger of 5-feet on Vista del Mar Lane. See pg. C-3. The text of the CPC TT Decision is at odds with the TT Map, with the decision suggesting the 5 foot vacation on Vista del Mar is being denied, and the TT Map itself showing the vacation. Hence, the CPC TT Decision needs to be clarified as to the actual Tentative Tract Map and reversions which are being approved.<sup>4</sup>

For housekeeping purposes, I have submitted emails with documents from the hearings below Bates Numbered in the lower left hand corner. Generally, the Bates Numbered materials consist of:

- The Master Response Applicant compiled for the Planning Department (the Planning Department wholesale adopted the applicant's response as its independent judgment);

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<sup>4</sup> The disparity between the TT Map and the CPC TT Decision is technically fatal. Here the Applicant has filed an application or petition for reversion to acreage. Pursuant to Government Code § 66499.13(c) that petition must be accompanied by a "final map which delineates dedications which will not be vacated and dedications which are a condition to reversion." Without waiving the argument, I'll proceed as if I understand the reversions.

- Documents and letters filed by the public which did not make it to the Master Response and raise issues which have as of yet have not been addressed by the Planning Department or applicant; and
- Selected additional supporting documents submitted with this letter or for the City Planning Commission Hearing (which are referenced but not included in their entirety in your binders).

I apologize for a small error in the bating process which resulted in some numbers being repeated. So if you find yourself looking for something in the affected range, you may need to look a little forward or back. The affected numbering is in the 1100 range. Generally, the Bates Numbering should make it easy to refer to a document referenced in this letter and some other community letters if you want to check veracity or context.

All arguments made in the hearings below and response to the IS/MND, whether by verbal comment or in writing, are hereby reserved and restated whether or not they are reflected in the electronic copy of Bate Numbered documents submitted with this letter. I don't agree with the responses.

### **1. THE PROJECT DOES NOT MEET THE REQUIREMENTS FOR A COASTAL DEVELOPMENT PERMIT.**

The project is in the Coastal Zone and subject to the standards of the Coastal Act which addresses preserving the marine environment, visual aesthetics, habitat, access to the coast, geological stability and the unique character of coastal neighborhoods.<sup>5</sup> “The Coastal Act was

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<sup>5</sup> California Public Resources Code Sections:

§30210. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

§30230 Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

§30231 The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.



enacted by the Legislature as a comprehensive scheme to govern land use planning for the entire coastal zone in California.” Pacific Palisades Bowl Mobile Estates v. City of Los Angeles, (2012) 55 Cal. 4<sup>th</sup> 783, 793 (“Pacific Palisades”) (internal citation omitted). The Coastal Act is to be “liberally construed to accomplish its purposes and objectives.” Id. 793-94 (quoting Public Resource Code §30009). To the extent that the City has provided or been provided with guidelines for compliance with the broad statutory requirements of the Coastal Act through portions of the Westchester-Playa Del Rey Community Plan, the Coastal Bluffs Specific Plan,

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§30240 (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

§30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

§30252 The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

§30253 New development shall do all of the following:

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. . .

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

The public policies and legal requirements embodied in this Sections of the Public Resources Code are hereinafter referred to as the “Coastal Act Chapter 3 Priorities” or “Chapter 3 Priorities.”

the Scenic Highway Plan (as in effect when the project application was filed and continued in the 2035 Mobility Plan), the Coastal Commission South Coast Regional Interpretive Guidelines, the Coastal Commission Statewide and Regional Interpretive Guidelines and the Del Rey Lagoon Specific Plan, these plans and guidelines are part of the area land use element, as is the Coastal Act itself.<sup>6</sup>

The proposed project deviates from the requirements of Chapter 3 of the Coastal Act (the “Chapter 3 Priorities”) as written. In addition, the multiple wholesale deviations from the guidelines and plans and decisions of the Coastal Commission and the City regarding Playa del Rey add up to a clear violation of the Coastal Act as it has been measured and applied in our area.

A. Density Bonus Law and Incentives Do Not Trump the Coastal Act.

I have filed the entirety of the Court’s decision in Kalnel Gardens, LLC v. City of Los Angeles (Second District 2016) 3 Cal.App.5<sup>th</sup> 927, the City of Los Angeles’ Respondent’s Brief in the appellate case and the City of Los Angeles’ Opposition Brief in the trial court. LEG 2629-2662; LEG 2775-2799. I incorporate by reference the City Attorney’s very thoughtful arguments regarding the interaction of the Coastal Act and density bonus law, including the State SB 1818 and City Affordable Housing Incentive Ordinance, and the role of the Regional Interpretive Guidelines in coastal decision making. I particularly like the City’s unequivocal understanding that:

Density Bonus law is clear that it “shall not be construed or in any way lessen the effect or application of the California Coastal Act of 1976. Division 20 (commencing with Section 3000) of the Public Resource Code.” Gov’t Code §65915(m). Furthermore, . . . the Density Bonus law only constrains the action of a “city, county or city and county.” Gov’t Code §65915(a). It does not purport to limit the City when it acts on behalf of the state Coastal Commission, implementing policies under the Coastal Act.

In other words, the applicant will propound his rights to height incentives, increases in FAR and parking reductions— but when you decide whether a Coastal Development Permit should be issued, you do not defer to these so called “rights.” Compliance with the Coastal Act comes first. In Kalnel Gardens, the court was very clear in its opening paragraph:

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<sup>6</sup> The IS/MND fails to address the changes in the land use element which will result from this project and the decision to no longer follow these elements, as they have been applied for more than thirty years, in the Playa del Rey area. As such the IS/MND is inadequate. There is also a reasonable argument that the changes in the land use element are substantial both in terms of this project and on a cumulative basis and an environmental impact report is required to assess the impacts of the changes under California Environmental Quality Act (“CEQA”).

. . . the Coastal Act takes precedence over statutes awarding density and height increase bonuses for proposed residential developments. Kalnel Case at 935.

Kalnel Gardens is particularly apt here. The facts involved a 15 unit project which sought roofline height varying from 33.75 feet to 40.5 feet. *Id.* 936. The project was allowed by the City Planners to exceed the height of its neighbors and applicable zoning because it provided affordable units. *Id.* 935. Neighbors testified that the “project’s three-story height. . . would tower over nearby properties.” There was no argument that some buildings in the area approximated the height of the project, a library across the street being a clear example of a larger building. *Id.* 936. But the key was “few, if any reach the height, story, scale and mass proportions of the proposed project. . .” *Id.* 936. So the issue in the Kalnel Gardens was precisely preserving “scale and character.” Scale and character was not defined as matching the tallest building in the surrounding area. Instead a comparison to the norm was used as to height, density, setbacks and other visual aspects. *Id.* 936 (neighbors testified as to the ratio of taller structures to one and two story structures). And, this violation of scale and character violated Section §30251 of the Public Resource Code, or in three words, the Coastal Act. The court found the City must comply with the Coastal Act.

Here, we have a greater scale and character concern. The project dwarfs its neighbors in height, mass and setbacks or lack thereof and other visual aspects—no question. Again, this bulk is not used to create additional housing density; it’s used to create luxury without regard to the Coastal Act. But we have other Coastal Act, Chapter 3 Priorities, which are also being violated in the case of this project. The Kalnel Gardens site is several blocks from the beach. There was no permanent obstruction of scenic vistas at issue, as is the case here. In Kalnel Gardens, given the size of the project and proximity to the beach, parking to coastal standards to ensure continued beach access was not an issue, as it is in this case. In Kalnel Gardens there were no habitat concerns, as is the case here. In Kalnel Gardens, the project was not being built in a known flood plain, with underground parking, based on a theoretical study which assumes away the effects of sea level rise and inadequate area drainage. Here, faced with sea level rise, the physical structure of the project, with parking extending 11 feet below the surface can act as a sea wall causing the surrounding beach to erode. Beach access can be affected over the life of the project in violation of the Coastal Act. In addition, geologic stability of the project, which has yet to be established by a relevant geotechnical report, can be undermined over the life of the project in violation of the Coastal Act. And, in Kalnel Gardens there was no danger that the project would prejudice adoption of a local coastal plan, as is the case here. In other words, this project presents a much more compelling case of Coastal Act violations being unlawfully rationalized on the back of density bonus law.

**B. The Project Violates the Coastal Act by Exceeding the 37 Foot Height Limit which Protects Scale and Character.**

The Director’s Determination recognizes that 37 feet is the height used in lower Playa del Rey based on a review of Coastal Commission precedent. Pg. 27-28. “. . .the previous actions of the Coastal Commission (outlined in the table below) consistently apply a height limit of 37 feet



for the area, established by the Del Rey Lagoon Plan.” The Director got this right. But then the Director added “11 feet through a density bonus affordable housing incentive.” Pg. 27. What the Director missed is the reason the Coastal Commission uses the 37 foot height limit. The purpose of the 37 foot height limit is to protect scale and character and to preserve the visual aesthetic of Playa del Rey and to avoid creating a precedent which would prejudice adoption of a local coastal plan at a later date. In other words, the Commission follows this rule precisely to comply with the Coastal Act and the Chapter 3 Priorities. An affordable housing height incentive is not allowed because a 37 foot height restriction is required to comply with the Coastal Act.

At the Commission’s December 8, 2016 meeting, the Steve Hudson, South Coast District Deputy Director (Los Angeles County) laid it all out in response to a request for an elevator tower which would exceed the 37 foot height limit. Mr. Hudson so clearly explains how the Coastal Commission views the 37 foot height limit in lower Playa del Rey, and its relation to Coastal Act compliance, that I decided to simply let him speak. I transcribed his speech as follows:

The primary issue raised by this application is the proposed 45 foot height of the structure, including its roof top access, which exceeds the 37 foot height limit for new residential development that has been previously allowed in this area, in order to minimize impact to public views from the beach and the coastal access and bicycle path which is located approximately 200 feet seaward of the subject site on the sandy beach and in order to maintain the character of the surrounding beach front community. **In past permit actions, over several decades, for new residential development in this area, the Commission has consistently limited the height of new development to no more than 37 feet. Now this, this height limitation of 37 feet is consistent with the policies which were previously approved in the Commission’s approval of the Land Use Plan in 1981. Now the 1981 Land Use Plan was approved by the Commission with suggested modifications but it was never accepted by the City, they did not accept the suggested modifications. So it was never certified and of course it is not a standard of review in this case and pursuant to the City’s proposal at the time, that land use plan had specific provisions that were at the City’s request to limit the height to no more than 37 feet. Now in its findings of approval of that land use plan document the Commission made findings that that height limit was appropriate to minimize adverse impacts to visual resources including views from and along the beach while also protecting and maintaining the community character. Thus although it is not certified as a document, that standard itself, not the LUP but the standard of 37 feet has been used by the Commission in past permit actions over several decades in other residential development in this area because the Commission has found that height limit is protective of coastal resources.**

Now I would just note as a comparison that although in the certified Venice LUP which we are well familiar with, the Commission allowed roof top structures to exceed the maximum height limits that were listed for a building for up to 10 feet. The difference though is that in the Venice area most of the height limitation are lower in stature, typically 25 to 30 feet and then you are allowed to have this exception for the roof top structures on top of that. **But in this area, in the way the LUP was originally drafted and the way the Commission has implemented this provision over the years is different, we went with this larger 37 foot building envelope and that was a hard max.** The idea was that you could fit your development within that larger 37 feet. It was the applicant's responsibility to design accordingly and we are not anti-roof structure but if you would like a roof access structure you would then design within that building envelope including any roof access structures as it was a much larger envelope than we typically see. . .

More importantly or just as importantly it would set a negative precedent for other development in this area and prejudice the ability of the City to prepare an LCP that conforms to the Chapter 3 policies of the Coastal Act therefore Special Condition 1 requires the applicant to submit revised plans for the review and approval of the Executive Director reducing the height of all portions of the structure to no more than 37 feet.

To amplify Mr. Hudson's speech, I have taken some of the decisions following the 37 foot height limited cited in the Director's Determination, and added language from the Coastal Commission Staff Reports, adopted by the Commission, so you can see that Mr. Hudson knows whereof he speaks. The 37 foot height limit is directly related to maintaining character and scale in lower Playa del Rey, avoiding adverse visual impact and protecting coastal resources—in other words complying with the Coastal Act.

April 2011, 309/315 Culver Blvd., 5-10-295, Two office buildings, 2 stories, 37 feet

**Note the discussion of the scale and character of commercial Culver Boulevard. This is the Coastal Commission testifying and finding on behalf of the appellants as to underlying facts as to what is the scale and character.**

“Playa del Rey is a small scale community located between Marina del Rey small craft harbor entrance channel and the Westchester Bluffs. Since the early 1970's, the community has recycled from one and two-story beach cottages to mostly two and three story single-family residences and duplexes in the residential areas. Culver Boulevard consists of a mix of one to three story residential and commercial developments.

In establishing precedent to determine the appropriate scale of development in the Playa del Rey community, the Commission originally required a height limit of 30 feet east of Pacific Avenue, including the area along Culver Boulevard. In response to the established height limit for this area and other areas of Playa del Rey, the City of Los Angeles held numerous community meetings and developed the Del Rey lagoon Specific Plan (draft LCP) for the area. The Specific Plan included a 37 foot height limit for the community.

Although the City's Specific Plan was not certified by the Commission, the Plan has been used as a guide for appropriate scale for development in the Playa del Rey area. The Coastal Commission has previously approved development at the 37 foot height limit (CDP No. 5-92-074) along Culver Boulevard. The proposed project will be consistent with the 37 foot height limit as established in the Specific Plan and will be consistent with existing development that varies from one to three stories along both sides of Culver Boulevard. Therefore, the Commission finds that the proposed three-story, 37 foot high development will be consistent with the height limit for the area and with the scale of existing development, and is consistent with Section 30251 of the Coastal Act.”  
<https://documents.coastal.ca.gov/reports/2011/4/W24a-4-2011.pdf>. LEG 2822 to 2863.

July 2002, 112/114 Culver Blvd., Permit 5-04-129, Single-family dwelling, 3 stories, 37 feet

**NOTE: This building is separated by a street and one lot from applicant's project. It's as close as you get and even an elevator tower over 37 feet is not consistent with the Coastal Act.**

“Although the proposed project's roof line is below the 37 foot height, at 33 feet, the 196 square foot roof access stairwell penthouse extends to 41 feet. The penthouse is setback approximately 18 feet from the front of the building. However, because of the small scale of surrounding development, the penthouse will be visible from the surrounding streets **and will increase the visual bulk of the building. In order to protect community character and visual quality, in past Commission permit action, the Commission has limited development to a maximum height of 37 feet.** Therefore, in order to protect the community character and visual quality of the area, Special Condition No. 1 limits the development to a maximum height of 37 feet above the existing grade, except for roof railings with an open design and measuring no more than 36 inches in height. The height as conditioned will be consistent with the height limit at approved by the Commission in past permit action and in its approval of the LUP. **Only as Conditioned is the proposed project consistent with Section 30251 of the Coastal Act.**” Pg. 10. <https://documents.coastal.ca.gov/reports/2002/7/M9h-7-2002.pdf>. LEG 2879 to 2899.



As documented in the Director's Determination, the Coastal Commission, which is the arbiter of taste when it comes to "scale and character" and compliance with Section 30251 of the Coastal Act, has been clear and consistent that 37 feet is the required maximum height. There is really no need for you to reanalyze the issue.

I have provided a character and scale study and analysis of the buildings in the commercial zone which supports the Coastal Commission's statements above that the buildings on Culver Boulevard are between 1 and 3 stories. As to the norm, which was the method of analysis used by the City of Los Angeles in Kalnel Gardens, 1 out of 9, I offer the following statistics for the commercial center of lower Playa del Rey, without counting the 10 parking lots which affect the visual character of the area and skew the statistics further in my favor:

- 4 Story buildings represent 1 out of 46 or 2% (the building is at the far East of lower Playa del Rey, while the project is at the far West);
- Buildings exceeding 37 feet represent 3 out of 46 or 6%, with those built after the Coastal Act representing 2% or 1 out of 56;
- Buildings less than 20 feet are 26 out of 46 or 56%;
- Buildings 20-30 feet are 11 out of 46 or 24%;
- In excess of 70% of the Buildings are 30 feet or under; and
- Buildings 30-37 feet are 6 out of 46 or 13%.

My understanding is that other residents will be providing similar analysis of different portions of lower Playa del Rey for your consideration.

As to the character and scale study presented by applicant at the City Planning Commission hearing-- applicant actually referenced a building, Playa del Oro at 8601 Manchester, which is a two mile drive from the project site using Google Maps, and many others which are outside the coastal zone. Whether you are looking at Kalnel Gardens or the Coastal Commission's decisions above, an analysis of scale and character which looks at buildings more than a few blocks radius from the proposed project is highly unorthodox and dysfunctional. Miles away is utterly unprecedented. The goal is to preserve the unique visual and scenic elements of a coastal area—analyzing buildings which cannot be seen or readily connected visually to the project and its coastal location is sophistry at its finest. The community picked the parameters of its analysis based on the area covered by the Del Rey Lagoon Specific Plan which is an area that both the City and the Coastal Commission determined was "related" for planning purposes.

In addition, I note that the Commission also measures height differently than the City. So 37 feet means 37 feet from the centerline of the road, at the center along the building frontage between the side yards, and drawing a line to the highest point of the roof of the building. As we have seen, that point can be an elevator tower or an architectural element. The 37 foot limit is a "hard max." So, measured the way the Coastal Commission measures height, applicant's building is not 48 feet, its 58 feet—as it has architectural elements which go that high and likely

the elevator tower reaches that height too.<sup>7</sup> So even if you were to stick with the Director's logic there would be no logic to allowing architectural elements, stairwells and elevator towers on the roof.

We can reason our way to the conclusion of this case, at least as to height, by simply taking the Director's admission that 37 feet is the required height, what the Commission has said is the reason for the 37 foot height limit, the character and scale and visual aesthetic of Playa del Rey and the Chapter 3 priorities, and then applying the requirement to comply with the Coastal Act found in Kalnel Gardens. You are left with a required hard max of 37 feet and must deny the Coastal Development Permit.

C. The Project Violates the Coastal Act by Creating an Unprecedented Lot Consolidation in Lower Playa del Rey.

Character and scale is not just about height. It also involves building massing and bulk. Here the TT Map combines 14 parcels, including public property, into 1 lot encompassing nearly an acre.<sup>8</sup> The out of character scale and massing of the project is illustrated from the air by Google maps and by the City's Zimas system as captured on pages 4-5 of this letter.

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<sup>7</sup> See Exhibit A Plans.

<sup>8</sup> The TT Map itself requires a coastal development permit. The Coastal Act is construed broadly to achieve its purposes. Public Resource Code §30009. The Coastal Act defines "Development" as among other things a: "change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code). . ." Public Resource Code §30106. Even without increasing the number of lots, a reconfiguration of land, which generates Coastal Act concerns is considered a "Development." In La Fey, Inc. v. Los Angeles County (1999) 73 Cal.App. 4<sup>th</sup> 231, the court found that the county properly concluded that a lot line adjustment, which did not increase the number of parcels, was a "Development" as defined in the Coastal Act. Key to the court was the fact that "the reconfiguration of the land can facilitate a development in ways that impact upon the interest of the Coastal Commission." Id. at 238. In La Fey the Coastal Act interest implicated was to minimize risks to life and property under Section 30253 and this brought the lot line adjustment within the "purview of the phrase 'any other division of land' as set forth in Public Resources Code Section 30106" Id. 238.

The TT Map portion of the project enables an increased intensity of development by combining 14 parcels, including public property, into a larger buildable area, and then dividing or dedicating portions of the combined lot to the City; changing the frontage of the individual lots to Vista del Mar (a purported major highway), which changes the allowed floor area under the City's Affordable Housing Incentive Ordinance; and eliminating side yard and back yard set-backs which would have applied to residential portions of projects built on the original lots. I addressed these issues extensively in my letter dated June 12, 2018 to the Los Angeles City Planning Commission and incorporate the analysis by reference. At a common sense level, the TT Map enables the whole over-sized project and engenders a "change of density or intensity of use." Because the TT Map, therefore, implicates Coastal Act concerns, consistent with La Fey, it is a "Development" as set forth in Public Resource Code Section 30106.

Mark Appel, a local Architect with 40 plus years' experience, has provided a technical analysis which confirms what is apparent from the Zimas and Google images above. Applicant's TT Map creates a lot which engenders development which is completely out of scale and character with the existing commercial center of lower Playa del Rey even if height is not considered as a factor. I have refiled Mr. Appel's letter as Exhibit B to this letter.

For these reasons, the Coastal Commission looks carefully at lot combinations as part of preserving scale and character. Combinations involving as few as two lots have been held to result in a deviation from the prevailing scale and character of an area in violation of the Coastal Act. At 418-422 Grand Boulevard in Venice, the Commission found a single family resident built on two combined lots violated the visual character and scale requirements of the Coastal Act. Th.12.5a, 418-422 Grand, hearing on Revised Findings June 9, 2016. <https://documents.coastal.ca.gov/reports/2016/6/Th12.5a-6-2016.pdf>. The Coastal Commission reached this conclusion even though there were other three story homes on the same block and in the immediate vicinity. The Commission found that the applicant's project which was 3,913 square feet, as a result of spanning two lots, was out of character and scale with proximate three story properties built on one lot which were approximately 1,100 and 800 square feet smaller. LEG 2900 to 2932.

Lot combinations are not just a concern in Venice. Both the Coastal Commission and the City of Los Angeles have addressed lot combinations in lower Playa del Rey in the context of the Del Rey Lagoon Specific Plan, which was approved by the City of Los Angeles and then by the Coastal Commission<sup>9</sup>. The plan was not certified because the Coastal Commission sought to impose conditions related to tidelands trust jurisdiction which were not acceptable to the City. As noted above, the Coastal Commission regards the Del Rey Lagoon Specific Plan, while not adopted, as the "findings" of the Commission as to what is required to comply with the Coastal Act in the plan area. The Del Rey Lagoon Specific Plan prohibits lot combinations involving in excess of 10,000 square feet in the commercial zone if the proposed use will generate additional parking requirements and incremental traffic over an "F" intersection and the lots were not previously tied in 1981 when the plan was adopted. D.3.c(4) pg. 3i LEG 2741. A review of the environmental reports submitted by applicant as part of the IS/MND establishes that the project will generate traffic over an "F" intersection, Nicholson and Culver, and that in 1981 applicant's lots were not tied and were operated by three separate owners, as two businesses and a residence.

Accordingly, judged against the standard of the Del Rey Lagoon Specific Plan, by the naked eye or the information in the commercial zone character and scale study, the project and the TT Map are also inconsistent with the requirements of Section 30251 of the Coastal Act as they relate to character and scale because they create a lot substantially larger than that found in the area which enables construction of a building which has mass and bulk dwarfing anything

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<sup>9</sup> The status of the Del Rey Lagoon Specific Plan as an operative planning document in the City of Los Angeles will be addressed later in this letter.



else in the commercial zone. Just look at the pictures at the beginning of this letter and you will know applicant's building does not fit with its proximate neighbors.

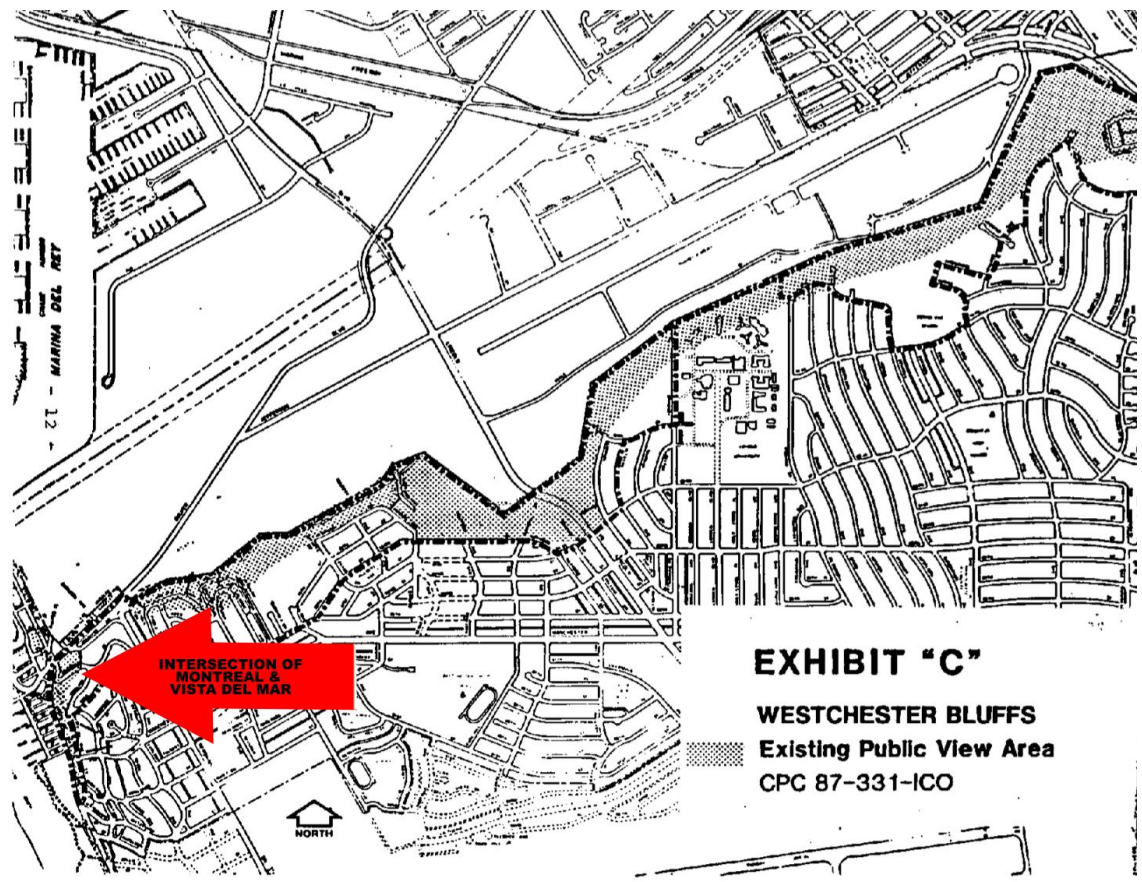
Applicant has attempted to argue that its building somehow conceals its oversized nature by breaking up the mass. Applicant claims the building is articulated on Culver (the plans show a single narrow entrance passage) and scaled for transitional height on Trolley Place. This of course makes no difference if you are viewing the project from the west or the east. Once you get past the narrow area of reduced transitional height, essentially a pool deck, the project is a solid wall at a single height for the full length on the Trolley Place side. On the Vista del Mar side, along the scenic highway, the project makes no effort to conceal its bulk and is a solid wall at a single height, with balconies jutting out. Despite this purported "articulation" the project remains completely out of scale and character.

D. The Project Violates the Coastal Act by Obliterating Locally Designated Scenic Resources.

30251 of the Coastal Act requires that: "Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas. . .and where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated . . . by local government shall be subordinate to the character of its setting."

Ordinarily, the views to be protected are described in the certified local coastal plan, which Playa del Rey still lacks. The City of Los Angeles has, however, on multiple occasions in multiple planning documents and ordinances designated the views of the coastal bluffs, the views from the Vista del Mar scenic highway and the views from the coastal bluffs in Playa del Rey, including the view from the corner of Montreal Street and Vista del Mar, as highly scenic and protected resources. These views include the Pacific Ocean, sand dunes, sand and the Santa Monica Mountains in an integrated panorama from among other locations the corner of Vista del Mar and Montreal Street. My letter to Greg Shoop dated December 13, 2013 inventoried these local designations and protections found in the Westchester Playa del Rey Community Plan, the Coastal Bluffs Specific Plan, the Scenic Highway Plan in effect as of the filing of the project application (as continued in the 2035 Mobility Element), and the Del Rey Lagoon Specific Plan.

Perhaps the clearest designation of what area views are protected is found in the City's original Interim Coastal Bluff Ordinance which protected exactly the view from the corner of Montreal Street and Vista del Mar which Mr. Duhe's 3D models depict. Below is Exhibit C to the Ordinance which designates the Existing Area Views Protected with an arrow pointed to the corner of Montreal Street and Vista del Mar which is clearly designated as protected. LEG 1403-1436.



Mr. Duhe's three dimensional models illustrate that the panoramic views of the ocean, beach and Santa Monica Mountains are simply obliterated, in violation of the Coastal Act, as a result of the siting of the project as proposed.<sup>10</sup>

<sup>10</sup> To quote just a few of the other provisions in City of Los Angeles planning documents and ordinances which designate and protect the Playa del Rey area views:

Westchester-Playa Del Rey Community Plan, a Part of the General Plan:

Page I-2: The Bluffs in this area are significant natural features that provide dramatic views of the Los Angeles Basin while being visual features of Playa del Rey.

Page I-2: The Coastal Bluffs Specific Plan was established October 5, 1994 to guide residential and commercial development in the Playa del Rey Bluffs. The purposes of the regulations are to protect, maintain and enhance the overall quality of the coastal environment by regulating development on the bluffs. Regulations include provisions on height, yards, lot coverage, and other parts of construction projects.

Page I-4: **Opportunities**

- Physical beauty of the coastal bluffs in Playa del Rey and the views provided by these natural features.

I don't believe Mr. Duhe's models leave doubt as to the impact on area views. That said, I would like to critique the visual impact studies the applicant has performed. I have attached the visual impact studies performed by applicant, first in the IS/MND and then in a supplemental submission as Exhibit C. The IS/MND provided a line of sight visual impact study performed from 110' MSL. So yes, if you stand on the portion of the bluff which is 100 feet tall—you can still see the ocean over applicant's project. The view point at Montreal and Vista del Mar is located at 48' MSL<sup>11</sup>.

The applicant then submitted a Visual Impact Study to assess the view down Montreal Street purporting to demonstrate that:

- from the "top" of Montreal Street 85' MSL, a wide open ocean and white sand view became a view of some ocean and the horizon, with no sand or sand dunes to lend context;

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Page III-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.

**Program:** The possible impacts to existing scenic resources, designated scenic highways or public view sites, and the overall visual quality of adjacent residential areas shall be considered in the approval of all discretionary permits.

1-6.2 Protect the public views and scenic quality of the highly unique residential areas in this community, such as those located along the coast and on the Westchester Bluffs.

**Program:** The preservation of public views in coastal areas is a major objective of the California Coastal Act of 1976, and will be implemented through Local Coastal Programs required by State Law to be prepared by the City, and certified by the California Coastal Commission.

Coastal Bluff Specific Plan:

Page 1: The purposes of this Specific Plan are as follows: . . .

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.

<sup>11</sup> The Mean Sea Level elevations (MSL) other than for the original IS/MND line of sight study were generated by walking around and using the houses and other landmarks in applicant's study and then using an altimeter.



- from the “middle” of Montreal Street, an ocean view became a sliver of ocean and the horizon, and the picture is taken from 83’ MSL (not the middle of Montreal Street at all which is 59’ MSL);
- from a house at the base of Montreal Street second story (MSL unknown), based on geometric shapes rather than actual visual images, apparently some ocean would remain visible; and
- from what is purported as the bottom of Montreal Street (MSL unknown), at some location I cannot recreate walking up and down the street with the geometric image in hand, apparently some information is about the view but I cannot tell what or from where.

So ask yourself—why could applicant easily produce the “top” of Montreal Street and the “middle” of Montreal Street as visual images with applicant’s building super imposed but then only generate geometric shapes to represent the lower elevations? Why doesn’t applicant use MSL to tell us where they are studying from? What is applicant trying to hide? I believe Mr. Duhe’s work at 51’ MSL amply answers this question. At the bottom of Montreal Street, which is the iconic Playa del Rey view, applicant’s building simply walls off the ocean, sand and even portions of the Santa Monica Mountains forevermore.<sup>12</sup>

Moreover, none of applicant’s visual impact work considers the views of the coastal bluffs themselves which are also protected. The reason is demonstrated by Mr. Duhe’s work as the views are again obliterated forevermore.

#### E. The Project Impedes Public Beach Access in Violation of the Coastal Act.

Section 30252 requires that new development should maintain and enhance public access to the coast by providing adequate parking facilities. The Coastal Commission takes the position that new development must provide adequate parking, as judged against commission established standards. The Coastal Commission explained as follows in a Venice case which predated the Venice LCP.

The Commission has consistently found that a direct relationship exists between the provision of adequate parking and availability of public access to the coast. Therefore, in order to conform to the Chapter 3 policies of the Coastal Act, the proposed project must provide an adequate parking supply to meet the needs of

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<sup>12</sup> The impact we are evaluating is also a potential significant impact under CEQA. Because there is a reasonable argument of a potential substantial visual impact, an EIR is required to evaluate the impact and, perhaps more importantly, consider mitigations. For purposes of this analysis, aesthetic impacts include both public and private views and public views can even be views from a hiking trail—let alone a public street. Ocean View Estates Homeowners Association, Inc. v. Montecito Water District (Second District, Division 6 2004) 116 Cal.App.4<sup>th</sup> 396, 402 (finding fair argument supporting EIR based on subjective expressions of concern regarding view affect of cover on public reservoir visible from two homes and a public hiking trail). Sufficient evidence to trigger an EIR requirement was found based on the subjective reaction of members of the public—questions, comments and expressions of concern were deemed sufficient evidence.

the proposed new development. Adequate parking means that parking sufficient to meet the demands generated by the proposed development must be provided on the site or within a reasonable distance of the site. The Commission's Interpretive Guidelines and previous actions are used to determine how many spaces are sufficient and what is a reasonable distance for off-site parking. Staff Report, Substantial Issue Finding, April 10, 1997, 1105-1119 Ocean Front Walk, Venice, A-5-VEN-97-032, Hearing May 13-15, 1997, Executive Director Appellant, <https://documents.coastal.ca.gov/reports/1997/5/T15e-5-1997.pdf>. LEG 2933 to 2952.

For Playa del Rey the parking standards are found in Del Rey Lagoon Specific Plan and the Regional Interpretive Guidelines, both of which are essentially the same. Multiple-Family Dwellings are subject to the parking appendix (Regional Guidelines, pg. 12, A.1.,2.a.) which provides 2 spaces for each dwelling unit and one guest space for every 4 units or fraction thereof. LEG 2283. The Del Rey Lagoon Specific Plan requires Multi-Family Residential to provide parking of not less than 2 spots per residential unit and one guest spot for every 4 units or fraction thereof, one spot per 200-300 square feet of floor area of commercial and 13 spaces per 1,000 square feet of restaurant. D.3.d pg. 3m. (after LEG 2741 unnumbered). Kent Genzlinger has analyzed how the proposed project is under-parked against the Regional Guidelines and the Del Rey Lagoon Specific Plan. Under these circumstances, failure to meet the Regional Guidelines and the Del Rey Lagoon Specific Plan and provide adequate parking denies beach access and violates Chapter 3 of the Coastal Act.

Lest there be any doubt what the Coastal Commission has required for new development in Playa del Rey, I offer the following instances where the Coastal Commission or the City itself has strictly adhered to the Coastal Commission's parking standards—which exceed city requirements.

- Duplex required to provide 5 parking spots (Los Angeles Municipal Code §12.21.A4 would require a maximum of 4 spaces and less for units with less than two bedrooms)—Staff Report, May 22, 2001, 7025-7027 Trolley Way, Playa del Rey, California, Application Number 5-01-089, <https://documents.coastal.ca.gov/reports/2001/6/Th19i-6-2001.pdf>; LEG 2953 to 2984.
- Conversion of 3 units three bedroom units into 6 units with 3 one bedroom and 3 two bedroom units requires 6 additional spaces (Los Angeles Municipal Code §12.21.A4 would require 9 spaces for the new configuration but the Coastal Commission required 12 spaces) —Staff Report, December 17, 2000, 6204 Vista del Mar, Playa del Rey, California, Application Number 5-1-342, <https://documents.coastal.ca.gov/reports/2002/1/T3a-1-2002.pdf>; LEG 2985 and 3000 and
- 7,904 Square Foot Office Complex requires 32 spaces with covenant for attendant during business hours for tandem parking (Los Angeles Municipal Code §12.21.A4 would require 1 space per 500 square feet or 16 spaces)—Staff Report,

March 16, 2011, 309-315 Culver Boulevard, Playa del Rey, California,  
Application Number 5-10-295,  
<https://documents.coastal.ca.gov/reports/2011/4/W24a-4-2011.pdf>; LEG 2822-2863

- Los Angeles City Council, zoning lot in lower Playa del Rey, requiring 2 parking spaces per residential unit with an additional guest space for each 4 units based on the Del Rey Lagoon Specific Plan standard (Los Angeles Municipal Code §12.21.A4 would require 1-2 spaces per unit depending on habitable rooms), CPC 2006-2184 GPA-ZC-HD 250 62<sup>nd</sup> Avenue, Playa Del Rey, Page F-4 to F-5, LEG1553-1586.

F. Issuance of a Coastal Development Permit Would Violate the Coastal Act by Failing to Consider Sea Level Rise.

In reviewing the project, Debbie Lawrence and Juliet Oh, of the Los Angeles Planning Department, required a sea level rise study from applicant. Exhibit D- Email exchange between Juliet Oh, Debbie Lawrence, others in the Planning Department and Ben Resnik dated November 20, 2017.. Best I can tell, after multiple public records act requests, no such study ever made its way to the case file.

Los Angeles Planning Department Staff made the request based on a Coastal Commission decision interpreting recent Commission Sea Level Rise Guidelines at 305-309 Ocean Front Walk, in Venice, California, Staff Report, October 27, 2017, 305-309 Ocean Front Walk, Venice, California, A-5-VEN-17-0051, <https://documents.coastal.ca.gov/reports/2017/11/th25a/th25a-11-2017-report.pdf>. LEG 3035 to 3045. The 305-309 Ocean Front Walk project was located behind a county beach parking lot and across Ocean Front Walk at a MSL of 13 feet (applicant's project is at 10 MSL—or lower, Exhibit A Plans). The Ocean Front project involved a two story subterranean parking structure. The appeal sought a finding of substantial issue both in terms of coastal access—over the life of the project the garage could serve as a sea wall and generate beach erosion—and in terms of the ultimate geological stability and safety of the structure over the life of the project. Public Resource Code §§ 30210, 30211, 30235 and 30253 (regarding shoreline protective devices, maintaining beach access and structural stability). The appeal also contended that absent a sea level rise study there was no way for the City to have determined the project's compliance with the Coastal Act and that a substantial issue existed on that basis alone.

Faced with the appeal, the applicant prepared a sea level rise study. The Coastal Commission responded by preparing a:

simple sea level rise analysis using the CoSMoS tool, which was developed by the United States Geologic Service (USGS) 'in order to allow more detailed predictions of coastal flooding due to both future sea level rise and storms.' The CoSMoS tool shows potential flooding reaching the site given a 2.5-foot rise in



sea level with a 20-year storm scenario and a 1.6-foot rise in sea level with a 100-year storm scenario. Page 9.

The Coastal Commission determined that applicant's study was utterly inconsistent with the Commission's own examination using the CoSMoS tool and further study would be required to reconcile the differences. The Commission also found that:

- “The City’s findings for approval did not include an analysis of how sea level rise will affect the project site or surrounding area over the expected life of the proposed development. As such, the City’s findings that the project will be sited and designed in a manner consistent with the public access, coastal hazards, and shoreline protective devices policies of sections 30235 and 30253 of the Coastal Act are inadequate. Therefore, the Commission finds that the City did not provide an adequate degree of factual and legal support for its decision.” Page 10.
- “The City-approved development will allow a new, large structure on a beachfront area that could be subject to flooding and wave action associated with sea level rise, which will have adverse impacts to public access to the shoreline and sandy beach and on marine resources due to erosion. Therefore, the Commission finds that the extent and scope of the City-approved development is not consistent with the Chapter 3 policies of the Coastal Act.” Page 10.
- “As approved by the City, the development does not consider sea level rise and the associated impacts of that to public access and beach sand supply. Therefore, the Commission finds that the City-approved development is likely to affect significant coastal resources.” Page 10-11.
- “However, as an emerging and evolving issue, and as outlined in the Commission’s recent guidance on sea level rise, local jurisdictions must consider the effects that sea level rise may have on new development. In this case, the City failed to mention or analyze how the proposed project will be impacted by sea level rise. If the City continues to ignore the effects that sea level rise may have on new development, it would allow significant new development to be constructed in hazardous locations in the City. This, in turn, would make it more difficult for the City to craft an LCP that adequately addresses sea level rise and protects life and property in areas subject to coastal hazards. Therefore, the Commission finds that the City-approved development will prejudice the City’s ability to certify an LCP. “ Page 11.
- “The City’s action is not consistent with the public access, or hazards policies of the Coastal Act. Although the subject development may only affect public access and sand supply in the immediate area, it is not consistent with the standards set forth in the Chapter 3 policies of the Coastal Act and would set a bad statewide precedent in terms of following Chapter 3 policies, as interpreted in the Commission’s sea level rise guidance. Therefore, the Commission finds that the City’s action does raise issues of statewide significance.” Page 11.

In other words, the City should not have issued a coastal development permit because it lacked the basic information required to determine Coastal Act compliance. Lest there be doubt that we are in exactly the same position here, I call your attention to the fact that applicant's flooding study prepared by Kimley Horn dated December 9, 2014 expressly excluded "sea level rise" from its analysis. LEG 920-929 at 921.

Because it is not that hard to use the USGA CoSMoS tool, I used the tool. In the above case, the Coastal Commission looked at "potential flooding" and found it reached the Ocean Front applicant's site with 2.5 feet of sea level rise in a 20 year storm and 1.6 feet of sea level rise in a 100 year storm. I repeated the same conditions and variables and found applicant's site is inundated at 2.5 feet of sea level rise in a 20 year storm and 1.6 feet of sea level rise with a 100 year storm. My results are attached as Exhibit E.

Ultimately, the Coastal Commission approved a building at 305-309 Ocean Front Walk. The garage however was only 3.5 feet underground or had a bottom level at essentially 10 feet MSL—the starting elevation of the applicant's project at 138 Culver. So a building with ground level parking only could very well be the required outcome at 138 Culver. But the point is that under applicable Coastal Commission precedent—the project cannot be granted a coastal development permit absent an analysis of the likely effect of sea level rise and to do so would set a precedent which would impede the later approval of a local coastal plan which complies with the Coastal Act.

Oddly, despite their clear familiarity with the Coastal Commission's Ocean Front decision referenced above and their own prior request for a sea level rise study, Ms. Lawrence and Ms. Oh were two of the three individuals who signed the Director's Determination. Hence, they decided, without the very study they knew to be required by the Coastal Commission to analyze the issue, that the project complies with Section 30253 of the Coastal Act and poses no geologic or flood hazard and will not adversely impact beach access. Director's Determination pg. 25-26. Clearly, this decision is in error<sup>13</sup>.

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<sup>13</sup> For this site, the issue is not only the foundation itself but the proposed dewatering system. The CPC TT Decision references additional dewatering testing and then a determination if sheet pile walls, slurry bentonite diking or some other system is required to minimized dewatering. CPC TT Decision, Pg. C-10, Condition 27 b. The only data we have regarding what might be required is that of applicant. Hydroquip cautioned "extreme care should be taken not to extend dewatering levels to deeper than 55 feet." Pg. 4; LEG 867. The Dewind One-Pass Trenching—Soil-Bentonite Cutoff wall suggested by Citadel as an example of potential dewatering reduction techniques calls for installation in a "single pass under the water table." Pg. 1; LEG 885. Given that Hydroquip is telling us the water table extends quite deep until it hits solid material at 55 feet, we can assume we may also have an underground diking system which could act as a sea wall as sea level rises of the life of the project and affect beach access in violation of the Coastal Act. In addition, this is potential secondary impact of mitigation discussed quite cogently by the Coastal Commission needs to be disclosed and evaluated through an EIR to comply with CEQA.

G. The Rules Remain the Rules.

The Director's Determination acknowledges the Del Rey Lagoon Specific Plan as a guide for discretionary review in lower Playa del Rey and specifically with regard to height. The Director's Determination also acknowledges that the Del Rey Lagoon Specific Plan established a maximum height of 37 feet which has been consistently followed in lower Playa del Rey and specifically the commercial zone. Nonetheless, in the very next sentence, the Director's Determination finds the project at 48 feet is "consistent" with this standard and will not prejudice the later adoption of a local coastal plan. Pg. 26.

In determining what is required for Coastal Act compliance, the Director's Determination does not even nod to the Regional Interpretive Guidelines.

The West Los Angeles Area Planning Commission, in a decision dated March 13, 2017, addressing a project at 6401-6405 Ocean Front Walk, Playa del Rey, ZA-2014-1500-CDP-ZAA-MEL-1A, considered the continued vitality and role of the Del Rey Lagoon Specific Plan and the Regional Interpretive Guidelines. Far from disregarding the Del Rey Lagoon Specific Plan and the Regional Interpretive Guidelines, the WLA Area Planning Commission affirmed the continued role of both and in particular the Del Rey Lagoon Specific Plan for use in discretionary decisions regarding lower Playa del Rey, as follows:

The City does not have an approved Local Coastal Program for this area. In the interim, the City's Westchester-Playa del Rey Community Plan, a portion of the Land Use Element of the City's General Plan, and the Del Rey Lagoon Specific Plan followed in discretionary review in accordance with the City Council instruction, serve as the functional equivalent. . . The Westchester-Playa del Rey Community plan also established the goal of protecting the area's unique coastal qualities. The City Council's 1982 instruction subjecting discretionary review to the Del Rey Lagoon Specific Plan is designated as a program to support achieving this goal.

As stated in finding 1, the project is also in conformity with the California Coastal Act, and the Los Angeles County Regional Interpretive Guidelines, which as applied by the Coastal Commission and the City following approval in concept of the Del Rey Lagoon Plan, allow a 37-foot height<sup>14</sup>. Pg. 13. LEG 2810.

The Ocean Front Walk matter is particularly significant in that the Planning Department forced the applicant to scale back his originally planned 45 foot building, which matched his R-3 zoning designation under the land use map. The reasoning was that 37 feet was required to preserve the scale, character and visual qualities of the area and also to comply with the applicable land use plan, including the Del Rey Lagoon Specific Plan.

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<sup>14</sup> Note, the City is still following the Regional Interpretive Guidelines—at least according to the West Los Angeles Area Planning Commission.

As to the Regional Interpretive Guidelines, the aptness of my position that the Guidelines continue to guide the requirements for Coastal Act compliance, in the absence of a local coastal plan, is confirmed by the City's Opposition at the trial court level in Kalnel Gardens where the City argued that the Municipal Code mandated that it continue to apply the Regional Interpretive Guidelines, even though the City had adopted an express LUP for Venice designed to address Coastal Act issues. LEG 2795.

For whatever reason, in deciding this case, the Director selected to disregard the WLA Area Planning Commission decision and to proceed, after paying lip service, as if the Del Rey Lagoon Specific Plan does not exist. The WLA Area Planning Commission stands over the Director of Planning and is the senior decision making body. The Director's Determination erred in failing to follow the decision of the WLA Area Planning Commission which made it clear that the Del Rey Lagoon Specific Plan serves as the coastal plan equivalent for decisions in lower Playa del Rey. The City Planning Commission, which stands over the WLA Area Planning Commission, failed to decide the appeals and did not affirm the Director's decision.

Moreover, if applicant could demonstrate that the City no longer referenced the Del Rey Lagoon Specific Plan in its decisions following adoption of the Westchester-Playa del Rey Community Plan—he would have. If he could show you wholesale abandonment of the Del Rey Lagoon Specific Plan and following of the 45 foot zoning – he would. If he could show you the Coastal Commission and City of Los Angeles have merely followed the City Municipal Code in setting parking requirements for new development, again he would. But you'll note he is not pointing to consistent deviations and as the Director himself found the 37 foot height limit is intact and decisions regarding new development in lower Playa del Rey adhere to coastal parking standards.

Finally, applicant is trying to scare the City into not exercising discretion in connection with the Coastal Development Permit based on SB 1818 and Housing Affordability Act. In this regard I note, the City Attorney had ready responses in Kalnel Gardens (see Opposition and Reply), including that the City, when it considers a Coastal Development Permit is not sitting as a "city;" rather it is acting as the California Coastal Commission (the State) and expressly not subject to the ordinances with which applicant is threatening you. There is no reason not to use the legitimate discretion with which you are empowered to maintain compliance with the Coastal Act by using the Del Rey Lagoon Specific Plan on discretionary review, consistent with the Westchester-Playa del Rey Community Plan, and continuing to apply the Regional Interpretive Guidelines consistent with the Los Angeles Municipal Code.

#### H. The Project Does Not Comply with the Regional Interpretive Guidelines.

The City has adopted a Coastal Development Permit application process pursuant to which it sits as the first State of California reviewer under the Coastal Act—the City's jurisdiction is not as a City but as the Coastal Commission of the State. This process requires



consideration of the Statewide Interpretive Guidelines, as subsequently revised, and the other Coastal Commission Guidelines and decisions. Municipal Code Section 12.20.2.G.1(c)-(d).

In response to public records act request, the City advised that the Coastal Commission Interpretive Guidelines which it can locate and follows for Playa del Rey are the South Coast Regional Interpretive Guidelines and portions of the Statewide Interpretive Guidelines as they relate to the wetlands. LEG 2266-2333 consists of Public Records Act requests seeking to clarify what guidelines the City applies in reviewing Coastal Development permit applications, the City's responses and the documents the City provide in response including the Regional Interpretive Guidelines, South Coast Region, Los Angeles County, Adopted October 14, 1980 (the "Regional Guidelines"). This Public Records Act response is consistent with the City's position at the trial court level in Kalnel Gardens. The City's Kalnel Gardens Opposition argued that Venice lacked a certified coastal plan and the City accordingly considered the Regional Guidelines under both the City's own Coastal Development Permit Ordinance (Municipal Code Section 12.20.2) and the Coastal Act. Kalnel Opposition, pg. 17 LEG 2795.

The Regional Guidelines for Playa del Rey, include the following, requirements which the project does not meet:

Parking: Multiple-Family Dwellings are subject to the parking appendix (Regional Guidelines, pg. 12, A.1.,2.a.) which provides 2 spaces for each dwelling unit and one guest space for every 4 units or fraction thereof. LEG 2283. As stated in the Regional Guidelines, this parking requirement is derivative of the Coastal Act Chapter 3 Priorities found in Public Resource Code Sections 30210 and 30252(4) which address the need to prevent over-use and to enable coastal access. If the public cannot park because local residents are using all the street parking, the public cannot go to the beach. As discussed above, these standards, which are higher than the ordinary LAMC standards have been applied by the Coastal Commission to new development in lower Playa del Rey.

Height: Multiple-Family Dwellings are subject to a height limit of 30 feet "inland of Trolley Way" where the project is located with a slightly higher height for the Esplanade. Regional Guidelines, pg. 12, A.1.2.b. LEG 2275A. As stated in the Regional Guidelines, this height requirement is derivative of the Coastal Act Chapter 3 Priorities found in Public Resource Code Sections 30251 and 30252 which address right sizing development to preserve public coastal access, preserve public ability to use the coast by avoiding overloading coastal access roads, maintain the visual character of a coastal neighborhoods and maintain coastal visual and scenic qualities. Above the Coastal Commission has acknowledged that this standard was modified at the request of the City pursuant to the Del Rey Lagoon Specific Plan. Modifying it further takes something which has already bent and breaks it. The photos above in this letter and the 3-D Model Images prepared by Mr. Jim Duche demonstrate that this project violates the height restrictions found in the Regional Guidelines in a manner which degrades coastal visual and scenic qualities and changes the visual character of Playa del Rey, violating Chapter 3 of the Coastal Act.

Wetlands Compatibility: Multiple-Family Dwellings are subject to the requirement to be “demonstrably compatible with the existing and restorable wetlands and habitat areas.” Regional Guidelines, pg. 13, A.1.2.e. LEG 2277. As stated in the Regional Guidelines this requirement is derivative of the Coastal Act Chapter 3 Priorities found in Government Code Sections 30230, 30231 and 30240 which address the need to protect wetlands and other sensitive habitat areas through among other means appropriate adjacent development. Ms. Sandra Genis provided a letter below which addresses the potential effects of this building, and others which would be allowed if the land use rules for Playa del Rey are abandoned, on the Ballon Lagoon and the wetlands. Among her points is the concept that a corridor of overly tall buildings bisecting the two habitats will endanger birds. In addition, Liza Avencena, who holds a B.S. in Biology from UCLA and has studied the wetlands, wrote a letter dated September 16, 2014 which addressed how changes in the quality of the water (not quantity of water) can affect the phytoplankton and disrupt life in the wetlands. LEG 27. Applicant’s response via Terra Costa does not address the quality of the water at all—just the ability to recharge and admits a sphere of influence which is estimated to encompass a portion of the wetlands. Dr. Steve Deverel’s initial letter and subsequent letter filed at the City Planning Commission hearing also address quality of the water. Dr. Deverel specifically explains the potential for increased salinity at LEG 72. As noted in Dr. Deverel’s letter these affects should be considered cumulatively with the effects of other area projects, including the Legado project proposed for 220 Culver. Given the multiple ways in which the project will adversely affect the Ballona Lagoon and the Ballona Wetlands the project is inconsistent with the Regional Guidelines and Chapter 3 of the Coastal Act.

Vista Preservation: Multiple-Family Dwellings are subject to the requirement “retain existing vista points.” Regional Guidelines, pg. 13, A.1.2.f. LEG 2277. As stated in the Regional Guidelines, this requirement is derivative of the Coastal Act Chapter 3 Priorities found in Public Resource Code Section 30251 and 30252 which address preserving the visual character of a neighborhood and preserving coastal visual and scenic qualities. Again, Jim Duhe has provided 3-D modeling which demonstrates the impact on existing vista points and the community has been consistent in decrying the visual impact from the bluffs to the ocean and from the beach to the bluffs.

Suffice it to say, the Kalnel Gardens Decision and the positions the City took in its trial court Opposition Brief in the Kalnel Gardens case should put to rest any question that the Regional Guidelines are to be considered as guidelines and wholesale deviation is not consistent with the City’s position or the law.

I. The Project Does Not Comply with the Del Rey Lagoon Specific Plan.

As acknowledged by the Westchester-Playa Del Rey Community Plan and the Area Planning Commission decision for 6401-6405 Ocean Front Walk, the Del Rey Lagoon Specific Plan is lower Playa del Rey’s functional equivalent of a local coastal plan to be used on discretionary review, as a place marker, pending adoption of a local coastal plan. The

Director's Determination acknowledges this but then disregards the multiple violations of the Del Rey Lagoon Specific Plan which the project embodies.

As noted above, the project is in the Coastal Zone, hence subject to "quasi-judicial" or discretionary review and thus to be reviewed for compliance with the Del Rey Lagoon Specific Plan. More specifically, the proposed project is located in the section of the Del Rey Lagoon Specific Plan designated the "Commercial." Application of the Del Rey Lagoon Specific Plan has restricted residential density by requiring larger per unit lot sizes, restricted heights and stories and provided for self-parked development. These requirements are tailored to meet the Coastal Act requirements to preserve scenery along the coast, enable beach access and to preserve the historic character of our neighborhood discussed above.

Measured against existing development and the Del Rey Lagoon Specific Plan, the project is distinctly out of character for our area where for the last 30+ years building in the commercial zone has been:

- Limited to a height of 37 feet D.3.b(1), pg. 3k; LEG 2740;
- Limited to a FAR of 2.5:1 if the use is purely residential and 1:1 if any other use or combination of uses D.3.b(1)(i)-(ii), pg. 3k, LEG 2740;
- Not allowed for additional roof height (14 feet) or other roof structures other than antennas and chimneys as otherwise permitted in the municipal code D.3.b.2 pg. 3k LEG 2740;
- Restricted to residential use to lots which are vacant as of the effective date (the project site was not), buildings where residential is not more than 50%, or lots where more than 75% was residential on the effective date D.3.a(3) pg. 3k LEG 2740;
- Not allowed lot consolidations for a parcel over 10,000 square feet if the proposed use requires more parking and the project generates traffic over an "E" or "F" intersection D.3.c(4) pg. 3i LEG 2741;
- Required to provide parking of not less than 2 spots per residential unit and one guest spot for every 4 units or fraction thereof, one spot per 200-300 square feet of floor area and 13 spaces per 1,000 square feet of restaurant. D.3.d pg. 3m (after LEG 2741 unnumbered).

Kent Genzlinger has provided a letter demonstrating how profoundly under parked the project is as against the Del Rey Lagoon Specific Plan and the Regional Interpretive Guidelines.

J. Specific Relationship between Del Rey Lagoon Specific Plan and Chapter 3 Policies.

When presented with the Del Rey Lagoon Specific Plan, the Coastal Commission voted to conditionally approve the plan. I was able to determine this by speaking Al Padilla at the Coastal Commission in Long Beach, who was working for the Coastal Commission and on the area staff when the plan was presented, and reviewing his file. His file is found at LEG 2663-2714. The City declined to accept the Coastal Commission's conditions and finally adopted the

plan for certification. The reason referenced in the City's remaining files is a disagreement regarding the tidelands/submerged lands.

That said, the Coastal Commission's report is illuminating regarding the over-all areas of concern for coastal compliance in Playa del Rey and the ways the Del Rey Lagoon Specific Plan sought to satisfy the requirements of the Coastal Act. The report is also illuminating because both the City and the Coastal Commission were in agreement regarding the essential elements of the plan and the essential elements of any plan which met the requirements of the Coastal Act. A review of the report maintained by Mr. Padilla demonstrates the inextricable connection.

First, the City used lifeguard beach attendance surveys and determined the beach in Playa del Rey was more lightly used than Venice and Point Dume. The Coastal Commission noted that:

Attendance is limited by parking and by transportation to the beach. On the basis of this information collected over the course of writing the plan, the City of Los Angeles has proposed tighter parking standards to ensure development does not eliminate beach parking. . . Street parking lost to development must be replaced by the developer. California Coastal Commission Report regarding City of Los Angeles, Del Rey Lagoon Local Coastal Program dated December 2, 1981 (the "Commission Report/Lagoon Plan"), pg. 10, paragraph 4 LEG 2672.

Second, the Commission noted that several portions of the plan area have been identified as environmentally sensitive or adjacent to the same. After referencing the Marina del Rey entrance channel as a critical habitat for the least term (a protected species) and the geography of the area, the Commission concluded:

Development standards adjacent to the wetlands including standards for lighting, structural heights, and run-off are necessary to minimize impacts on habitat area. Commission Report/Lagoon Plan, pg. 12 LEG 2674.

Consistent with the Commission's analysis, Ms. Sandra Genis has provided letter which addresses the adverse impact of allowing buildings substantially taller than 37 feet on the area wildlife.

Third, the Commission addressed the role of the plan in preserving the visual character of Playa del Rey.

Much of the Specific Plan consists of a lengthy and careful analysis of the visual quality of the area and a determination of what kind of development will be visually compatible with the present development. As a result of this analysis, a height limitation of thirty-seven (37) feet was imposed over the entire community, signs were limited, walkstreets preserved, parking standards developed, and lot



consolidations limited to preserve scale, and definitions of height and bulk were meticulously defined. Commission Report/Lagoon Plan, pg. 13 LEG 2675.

The project violates multiple requirements of the Del Rey Lagoon Specific Plan which are essential for maintaining compliance with the Coastal Act in Playa del Rey. Accordingly, the project violates not just the yardstick against which Coastal Act compliance is measured in Playa del Rey but it also violates the Coastal Act.

K. Both the City and the Coastal Commission Have Followed the Del Rey Lagoon Specific Plan as a Guideline for Coastal Compliance.

The Coastal Commission and the City have used and continue to use the Del Rey Lagoon Specific Plan as a guideline for assessing compliance with the Coastal Act in the Coastal Zone of Playa del Rey. Case in point is the Ocean Front Walk decision by the Los Angeles Area Planning Commission reference above.

But there are more instances. I would like to call to your attention the provisions of the Community Plan, which far from substituting the plan and the zoning for the Del Rey Lagoon Specific Plan, make specific reference to the Del Rey Lagoon Specific Plan as the continued mechanism for ensuring compliance with the Coastal Act pending adoption of a LCP.

**Coastal Act**

**Policies**

18-1.1 Prepare a Local Coastal Program for the Westchester - Playa del Rey Coastal Zone, to consist of a Land Use Plan defining policy and a Local Implementation Plan including implementing ordinances.

**Program:** The Del Rey Lagoon Specific Plan was approved in concept by the Los Angeles City Council as a policy document to be considered in discretionary approvals. A Local Coastal Program Land Use Plan should be prepared to address these issues and implement the goals and policies of the California Coastal Act of 1976.

I would like to add one key example of the City of Los Angeles using the Del Rey Lagoon Plan as the yardstick to ensure Coastal Act compliance. The body acting on the instruction to apply the Del Rey Lagoon Specific Plan on discretionary review was the City Council itself and it applied more than just the 37 foot height limit.

CPC 2006-2184 GPA-ZC-HD 250 62<sup>nd</sup> Avenue, Playa Del Rey, [LEG1553-1586]:

Page F-4 to F-5

5. Del Rey Lagoon Specific Plan. The Del Rey Lagoon Specific Plan was adopted in concept by the City Council on March 16, 1982, it was not adopted as a specific plan

ordinance, but as a policy document to be considered on discretionary approvals within the area it covers, which includes the subject property in this case. Therefore, it is appropriate and consistent with the City Council's intent in adopting the Del Rey Lagoon Specific Plan to consider its regulations and policies in the instant zone change action, since it is a discretionary approval.

Where residential development is envisioned in the Del Rey Lagoon Specific Plan, there is a building height limit of two stories or 37 feet, a minimum lot area per dwelling unit of 1,200 square feet, and two parking spaces per dwelling unit, plus one guest space per every four dwelling units. However, the subject property is not within any of the subareas defined as developable by the Del Rey Lagoon Plan, but, because it is largely submerged land, was assumed to be part of Del Rey Lagoon Park. . .

6. b. The recommended "Q" conditions are necessary for the protection of the sensitive coastal environment on and adjacent to the subject property. These conditions are consistent with the residential and coastal resources objectives and policies of the Westchester Playa Del Rey Community Plan and provision of the California Coastal Act of 1976. They will also address the Del Rey Lagoon Plan Specific Plan, a policy document approved by the City Council in 1982 (see Finding No. 5 above). . . The recommended density of 1,200 square feet of lot area per unit is identical to residential density regulation in the Del Rey Lagoon Specific Plan for properties that have less sensitive locations . . . As conditioned the building height of the subject property will be limited to two stories or 26 feet. . . As conditioned, any development of the subject property will require parking at the ratio of 2.5 spaces per dwelling unit. . .

Approved as conditioned.

In the record below, we have cited a number of City Planning cases which follow the Del Rey Lagoon Plan.

- L. Deviation from Regional Guidelines and Del Rey Lagoon Specific Plan Would Make Enactment of a Local Coastal Plan Impossible and Violates the Coastal Act.

Both Public Resource Code Section 30604 and the City's Coastal Development Permit Ordinance provide that a project cannot be deemed compliant with the Coastal Act and a Coastal Development permit shall not be issued unless the City can find that issuance of the permit will not prejudice its later ability to adopt local coastal plan which complies with the Coastal Act. Here, we know through the Regional Guidelines and the Del Rey Lagoon Specific Plan what a compliant local coastal plan would look like, in the best estimation of both the Coastal Commission and the City.

At the hearing below several residents spoke to how Playa del Rey is at an inflection point for development and faces an onslaught of over-sized, out of character developments seeking below ground parking, under parking, greater heights and densities. Many of the

comment letters addressed the same point. This letter began by listing three projects waiting in the wings, either based on the IS/MND disclosures or master land use applications. In addition, the record below shows the neighbor who owns a large block of land immediately across the street from the project has filed a letter demanding the same treatment Legado receives. If this project is approved it becomes the new standard—for height, for parking, for disregarding vista points, for protecting wetlands and for disregarding sea level rise and placing high risks underground garages into the water table. The City will face “equal protection arguments” or abuse of discretion arguments from aggrieved applicants seeking the same excesses this applicant received.

As a consequence, once the dam is breached, Playa del Rey will never be able to adopt a local coastal plan which looks anything like what the City and the Coastal Commission decided was required to comply with the Coastal Act. Steve Hudson, South Coast District Deputy Director (Los Angeles County) hit on exactly this topic in disallowing a single elevator tower which breached the 37 foot limit stating that to allow the departure would “set a negative precedent for other development in this area and prejudice the ability of the City to prepare an LCP that conforms to the Chapter 3 policies of the Coastal Act.”

In this sense, the Coastal Act looks at the far reaching impacts of changing the rules for one project and is perhaps more powerful than the cumulative impact standard of CEQA. We need not limit our examination to projects which have “applied for permits” (which I contend is too narrow of a standard even under CEQA) but instead can look at the real world implications of the changes requested by the applicant and the effect of granting the project entitlements on over-all development in Playa del Rey. In this regard, every comment letter which applicant dismissed with reference to the “cumulative impact” discussion under CEQA should be reconsidered as a reason why this project should not be allowed to set precedent and make later adoption of a local coastal plan impossible.

M. The Application is Missing Required Information and Cannot Be Approved.

Separate from the lack of a sea level rise analysis, the Coastal Development Permit Application is incomplete as to geotechnical and other data. Specifically, we do not have a haul route application which is required for all Coastal Development Permit Applications which propose to import or export in excess of 1000 Cubic Yards or more. This project proposes to export 29,700 cubic yards of dirt on the face of the Coastal Development Permit. Assuming the required Haul Route Form was completed, a Geotechnical Report would also be required, as haul route applications for projects which grade in excess of 5,000 cubic yards require geotechnical reports.

The missing information is required to assess geological risk associated with the project as required by the Coastal Act.<sup>15</sup> By granting a Coastal Development Permit without a complete application, the City is failing to perform its duties, by failing to adhere to procedures the City

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<sup>15</sup> California Public Resource Code §30253.

itself has established to assess risks required to be evaluated under the Coastal Act. The City is also violating due process, abusing discretion and failing to accord a fair hearing. Several issues related to exactly these topics—haul route, noise, air pollution, construction related traffic and geotechnical risk were raised in the initial hearings and letters filed in response to the IS/MND and are still being raised.

By way of specific example, the public and the decision maker are left at a disadvantage by proceeding with a geotechnical report which is for a building with two stories underground parking. Perhaps the most critical example, is the lack of any discussion, comparable to that found in the original geotechnical report of required construction and on-going dewatering. Geotechnical Investigation, Geocon dated December 2009 LEG 962-964. So we are left with an applicant who simply states, we will not be in the ground water, don't worry, but without a geotechnical engineer who has signed and placed their license number on a report which demonstrates this is true. A cynic would say this is likely why we are now proceeding without a geotechnical report as any new report would admit the building remains about 5 feet in the groundwater based on the borings performed at the site and dewatering will be required. See Letter from Steve Deverel Ph.D. dated August 9, 2018 addressing current depth of foundation and groundwater. Exhibit

In addition, issues such as bottom heave (resulting from dewatering), potential subsidence and the effect of the same on the Venice Dual Force Main were never considered in the Geocon Report—which was written prior to selection of the route for the main. That said, the Venice Dual Force Main EIR simply assumed there would be no dewatering adjacent to the new main. See my letter dated March 15, 2018 and related exhibits LEG 2584 to 2638. Among other things, the letter highlights the potential in these area soils to destabilize adjacent structures through settlement induced by dewatering. Report of Robert Stones & Associates, Inc. date April 1, 1987 LEG 2604-2628 frankly admitting inability to guaranty stability of adjacent structures. LEG 2616-2617. This and the other potential impacts such as subsidence are potentially significant. Dr. Deverel recommended that subsidence be evaluated as part of the over-all hydrogeological model recommended by applicant's consultant Citadel. Letter dated June 8, 2018 pg. 5. We don't have adequate information or analysis and an EIR is warranted. To the extent we have a Geotechnical Report from Geocon, again it does not account for the Venice Due Force Main being adjacent to the project and does not address a building which has a foundation approximately 10 feet under ground rather than the deeper 2 story garage originally envisioned. This places the project foundation above the adjacent main which is at about 25' adjacent to the project, creating potential loading, as opposed to the deeper foundation for the two story underground garage, which was below the main.

The City's solution in the CPC TT Decision is to impose a requirement for a new Geotechnical report and that the building be designed incorporating appropriate design mitigations. CPC TT Decision, pg. C-10, Condition 27 a. The point, however, is that both for CEQA and the Coastal Act, you are supposed to know you can build a stable building which will

not adversely affect adjacent structures before you approve the project. Under CEQA Mitigation is being impermissibly deferred and there is a reasonable argument, based on the Venice Duel Force Main EIR design assumptions, that the project will have a substantial environmental impact. Under the Coastal Act, you are being asked to grant a permit without the information required to analyze compliance, same as the sea level rise example above.

## **2. THE TENTATIVE TRACT MAP CANNOT BE APPROVED**

First, and foremost, the City is not required to give the applicant property which has been dedicated to the City for public purposes. You may—but you are not required to do so. Government Code Section 65915(l) makes it clear that government property is not an incentive or concession which must be granted to an applicant for affordable housing. In that sense, you have unfettered discretion. But if you want to give the applicant public rights-of-way, you must make the finding that the rights-of-way have no present or potential future public purpose. You cannot make this finding for any of the requested vacations.

A. Vista del Mar Lane, formerly known as the Alley has a prespective and present public purpose.

Vista del Mar Lane started life as part of the “alley” shown on Tract Map 8301. The other part of the alley shown on the Tract Map became Trolley Place and runs between applicant’s lot and the City’s R-1 lot on the west side of the project.

See below.



# TRACT N<sup>o</sup> 8301

IN THE CITY OF VENICE

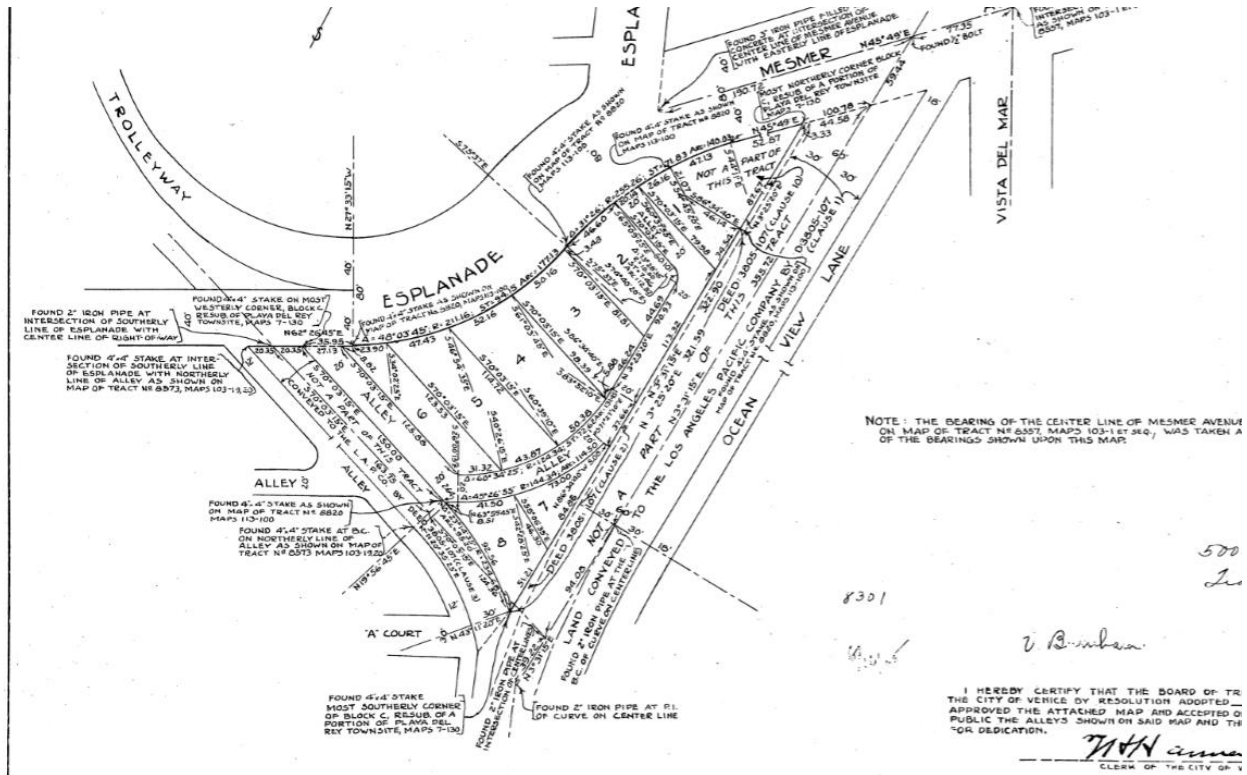
BEING A SUBDIVISION OF A PORTION OF BLOCK 'C' OF A RESUBDIVISION OF A PORTION OF PLAYA DEL REY TOWNSITE AS RECORDED IN MAP BOOK 7, PAGE 130, RECORDS OF LOS ANGELES COUNTY, CALIFORNIA.

SCALE - 1" = 60 FT. PORTER H. ALBRIGHT MAY 1925  
 - CIVIL ENGINEER -

WE HEREBY CERTIFY THAT WE ARE THE OWNERS OF OR INTERESTED IN THE LAND INCLUDED WITHIN THE SUBDIVISION SHOWN ON THE ANNEXED MAP AND THAT WE ARE THE ONLY PERSONS WHOSE CONSENT IS NECESSARY TO PASS A CLEAR TITLE TO SAID LAND AND WE CONSENT TO THE MAKING OF SAID MAP AND SUBDIVISION AS SHOWN WITHIN THE COLORED BORDER LINE AND HEREBY DEDICATE TO PUBLIC USE ALL ALLEYS SHOWN ON SAID MAP WITHIN SAID SUBDIVISION.

TITLE GUARANTEE AND TRUST COMPANY

BY *[Signature]* PRESIDENT  
*[Signature]* VICE PRESIDENT



In 1929, Ocean View Lane and Trolley Place were opened as streets by Ordinance . LEG 2873-2877. In 1938, Ocean View Lane was subsequently renamed Vista del Mar Lane. LEG 2878-2879. So for title purposes, identifying the property based on the tract map, Vista del Mar Lane is an “alley.” But for use purposes it has been designated a street. Call it a “paper street.” The cadastral map for the City of Los Angeles and several other mapping systems reflect this technical dual status. Applicant’s own Tentative Tract Map describes both Vista del Mar Lane and Trolley Place as “Parcel 7: That portion of Vista del Mar Lane, formerly known as alley. . .”

The Tentative Tract Map treats Trolley Place exactly same. “Parcel 12: That portion of Trolley Place, formerly and alley. . .”

The community has a parking crisis. That has been amply documented below and by the Coastal Commission. At this point, both Vista del Mar Lane and Trolley Place (which includes a community operated tandem parking area) are being used for parking (or at least they were until the Bureau of Engineering temporarily removed parking from Vista del Mar Lane to provide bicycle access and a pedestrian walk way during the Venice Dual Force Main construction. So it is not arbitrary or capricious for the City to state that in lower Playa del Rey, paper streets, including Vista del Mar Lane and Trolley Place, which extends to the tandem are used for public parking which is vital for residential quality of life and vital for public beach access. Vista del Mar Lane has been documented in the record below as having capacity for approximately 10-14 cars depending on how the parkers park.

In addition if you find Vista del Mar Lane cannot be used for parking like the other paper streets in lower Playa del Rey, the Great Streets program, the complete streets program and the Westchester-Playa del Rey Community Plan call for use of alleys as walk ways (the current use to which the Bureau of Engineering has put Vista Del Mar Lane), green spaces and bioswails (if you find Vista del Mar to be for use purposes an alley). Here given the area flooding, a pervious surface at this location is beneficial. And, there’s always the dog park—which is a vital community amenity. The point is—if Vista del Mar Lane is an “alley”—there are still important community uses which it could serve which are consistent with the announced polices of the City of Los Angeles.

The finding you are required to make to vacate Vista del Mar Lane in favor of the applicant is the area to be vacated “by reversion to acerage are unnecessary for present or prospective public purposes.” You simply cannot make this finding primarily because Vista del Mar Lane is a “paper street” and like the other “paper streets” in the area affords vital public parking and has for decades. You also cannot make this finding because Vista del Mar Lane is currently demonstrating its utility as a walk way and bicycle path and could be used for any number of purposes proposed as beneficial uses for alleys in the City’s planning documents, not the least of which is flood control.

**B. Culver Boulevard Has a Prespective Public Purpose.**

Applicant seeks vacation of 10 feet of Culver Boulevard north of the project site. This land could be used for badly needed slant head in parking, parklets or bicycle paths. All of these uses meet community needs identified in planning documents. In addition, applicant’s traffic study did not contemplate the narrowing of Culver and loss of the right turn lane from Culver East onto Vista del Mar. Loss of this turn lane means that pedestrians crossing Vista del Mar will obstruct persons attempting to go south off Culver who will in turn obstruct those seeking to go straight. Surely, a use for 10 feet of Culver is as a left turn lane in the over-burdened traffic

pattern of Playa del Rey. Again it is not possible to make the finding that there is no prespective public purposes for the 10 feet of Culver Boulevard.

C. Trolley Place/Slant Head in Parking.

The West Side of Trolley Place is already used for slant head in parking. The East side could be similarly configured. Again, it is not possible to find there is no prospective public use for the right-of-way.

D. Applicant Does Not Own the Property for Which It Seeks Vacation.

I wrote a letter dated September 15, 2015 analyzing the underlying title documents, including tract maps and deeds for the streets surrounding the project. I also wrote a similar letter to the Advisory Agency in connection with the Tract Map portion of the hearing. My conclusion based on the documents and the applicable case law was that applicant does not own the land it is seeking to have vacated. I note none of the documents referenced in my letter made it to applicant's argument response. So I call your attention to LEG 2398-2467. Applicant did not argue the substance of the issue beyond stating I was speculating, that the comment did not belong in a letter addressing MND concerns, and that the Advisory Agency and Bureau of Engineering would verify title. LEG 237-241. Most notably applicant itself did not attempt to refute any of the analysis. At this point, the Bureau of Engineering is imposing a "special condition" in the CPC TT Decision which requires that consents to the streets being merged or waivers be obtained from "all property owners who might have an underlying fee interest." CPC TT Decision, C-1, Condition pg. 3 a. The Bureau of Engineering is not telling you applicant is the owner of the "streets" Culver and Vista del Mar in particular where vacation is sought. They are hedging.

To be clear, there is no way applicant owns Culver at the intersection of Culver and Vista del Mar or Parcel 2 of the TT Map. The original deed was between Beach Land Company and Los Angeles Pacific Company on July 12, 1909 and was based on a metes and bounds legal description, with no reference to granting an interest in any property beyond the metes and bounds. LEG 2414-2433, Clause 3 at LEG 2415. The same metes and bounds description is still found in the TT Map description. Parcel 2. To the extent applicant's deed purports to address the section of Culver adjacent to parcel 2 it does so in the form of a quit claim, granting "such portion as shall be conveyed. . . " For this reason alone, you must hold on to the portion of Culver Boulevard abutting the project site at the intersection with Vista del Mar, which would make a perfect right turn lane, in what the applicant proposes will be a one lane Culver Boulevard. Culver Boulevard is the main egress for lower Playa del Rey.

In addition, I still maintain, as I did below that Tract 8301, the Tract applicant's lots are part of, never included any portion of Culver Boulevard. A deed which states it conveys: "That portion of Culver Boulevard. . . which would pass with the legal conveyance of parcel X" (where X is a lot in Tract 8301) is a quit claim which does not convey title to any portion of Culver Boulevard. The lots in Tract 8301 never had title to the centerline of Culver Boulevard because

Tract 8301 was formed by metes and bounds and specifically excluded Culver Boulevard. The reason for the exclusion was that the Railroad owned the strip of property on the North side of Tract 8301, the south half of present day Culver Boulevard, when the Tract was created. In other words, the Tract creator did not have title to Culver Boulevard and could not include in the Tract that which the Tract creator did not own. Accordingly, Applicant must provide more proof of title to the 10 feet of Culver Boulevard that it is requesting be vacated than a deed which conveys lots in Tract 8301 and such portion of Culver Boulevard as passes with such lots or a preliminary title report addressing the same legal descriptions.

You are required as a condition to granting the TT Map to find that “All owners of an interest in the real property within the subdivision have consented to reversion.” CPC TT Decision, Pge F-8. That’s a complex statement of the required finding. My restatement may be easier to follow. The City is required to find, prior to approving the TT Map, that the property the City is vacating in favor of the applicant is owned in fee by the applicant. In order to make this finding—you must have some evidence. Currently, you have none.

3. THE MND IS INADEQUATE AND AN ENVIRONMENTAL IMPACT REPORT MUST BE REQUIRED

**Master Response 1: Dewatering**

I would like to review the risk associated with dewatering based on the standards of significance in the Venice Dual Force Main EIR. Specifically, an impact is significant if:

The proposed Project would cause a significant impact on groundwater quality if it would:

- Result in a change to the rate or direction of movement of existing contaminants;
- Result in the expansion of an area affected by contaminants;
- Result in an increased level of groundwater contamination (including from direct percolation, injection or salt water intrusion); . . .
- During construction and in the case of dewatering, result in a potential increase to the amount of surface water into local water bodies. . . Venice Dual Force Main DEIR, Hydrology, Water Quality and Storm Water Runoff, Section 5.8, pg. 5-95.

Where we stand is expert to expert and sometimes with their expert on our side.

Dr. Steve Deverel:

Dr. Deverel’s reports substantiate that each and every one of these impacts will occur if applicant simply proceeds with construction as planned.

IS/MND:

LEG 1873 “Due to shallow groundwater depth in the area, it is likely that construction dewatering will be required for the proposed subterranean parking. Pumping activities could increase the groundwater gradient toward the Site, which could pull the documented groundwater impacts at the Del Rey Cleaners.”

Sounds like an admission of significant impact given the thresholds.

Hydroquip Pump and Dewatering (Applicant’s consultant):

LEG 870 Gives us 21-22 pumps and wells each dewatering at a rate of 140 to 180 gallons per minute. That’s a lot of water. If it goes where the applicant’s initial dewatering permit said it would, it will all be going into the Pacific ocean via Playa del Rey’s over taxed storm drain system. At a minimum, increased surface water into local water bodies. . .

Citadel (Applicant’s consultant):

Dr. Steve Deverel, have provided a rebuttal to Citadel’s June 22, 2018 report. I would like to elaborate on the significance of one of Dr. Deverel’s points. The project faces a dilemma: either dewater continuously or fail to comply with the City of Los Angeles Methane Mitigation Ordinance, leaving the potential significant effect of methane unmitigated.

Citadel assumes in fn. 1 to the June 22, 2018 letter that the project will be allowed to merely comply with the “County” methane mitigation ordinance. The City of Los Angeles has its own methane mitigation ordinance. As Dr. Deverel has explained in each of his three reports, to comply with this ordinance, the project will be required to maintain a space 18” under the foundation dry for perforated methane mitigation pipes. Given the depth of groundwater and the building foundation maintaining this dry space requires continuous dewatering.

There is no reason to believe the project will not be required to comply with the City Methane Mitigation Ordinance. But, if for some reason, compliance is not required, the project will no longer be in compliance with the regulatory scheme in the City of Los Angeles for methane mitigation, relied upon by the IS/MND. This creates the need to evaluate the adequacy of some alternative, unknown, non-compliant mitigation scheme for which we have no benchmarks or criteria, leaving a potential significant impact from methane for which we have no certain mitigation described in the IS/MND. Simply put, the project cannot rely on the City regulatory scheme to ensure there is no significant impact from methane at the site and then not comply with that regulatory scheme. Moreover, deferring to the Los Angeles Department of Building and Safety is not helpful. Specifically, in response to Public Records Act Request the City of Los Angeles Department of Building and Safety was unable to provide any criteria by which a non-statutory alternative methane mitigation strategy would be judged or approved. Rather, they simply referred to pages 1 to 8 of their Standard Methane Mitigations Plans, which like Table 71, require a space 18” under the building to be kept dry for Methane Level II mitigation. See Exhibit E and Legado Bates 3046-3055 which are the Standard Plans pages 1 to 8 and require dewatering for Methane Level II.



Terra Costa (Applicant's consultant):

LEG 917 Figure 8, Anticipated Groundwater Flow, Quadrant labeled 1, shows the Del Rey Dry Cleaners within the anticipated influence almost exactly where the 1 is. **Please take a look at this graphic it is powerful for appellants.**

I'd score this changing the gradient and moving contaminants likely as against the threshold criteria.

The proposed mitigation is illusory and impermissibly deferred in violation of CEQA. The CPC TT Decision has added a new requirement for a report which will determine how much dewatering will be required and then a potential requirement for mitigations such as curtain wall or slurry bentonite diking. CPC TT Decision, Pg. C-10, Condition 27 b. What we don't know is what objective standards will be used to determine if the additional mitigations will be required and against which their efficacy will be measured. How much of a change of gradient is permissible? We also don't have the testing required to evaluate the efficacy of the of the potential mitigations applicant's own consultant Citadel called for in its 2015 report. But more to the point, under CEQA this whole process—determining the required dewatering, determining the appropriate mitigation in light of a serious public health concern and determining if the mitigation has secondary impacts (we are talking about diking nearly an acre sized lot a block and half from the beach to an unknown depth—see the sea level rise and sea wall concerns above)—is to be evaluated in public and ultimately decided by an elected body.

Finally, as to the other agencies and Federal and State laws which might be involved. We have no information regarding what they are or if the agency will even assume jurisdiction. The Regional Water Quality Control Board expressly states they have no jurisdiction over the movement of the plume. See my September 15, 2014 letter. Moreover we don't know what standards the mystery agency which will supervise applicant will use or what mitigation it will require, so we certainly cannot assess the adequacy. The City of Los Angeles is sitting in the seat of "Lead Agency" and has the power and the duty to avoid poisoning its citizens. This building must wait for the Regional Water Quality Control Board to close the Del Rey Cleaner's site if concrete, verifiable measurable mitigations cannot be imposed now by the City of Los Angeles.

**Master Response 2: Cumulative Impact and Segmenting**

**Piecemealing and Applicant's Projects**

The CPC TT Decision simply addresses this issue by stating applicant has no intent to build on either of the two lots it owns. In the Master Response, applicant provides a long dissertation on the law of cumulative impact and piecemealing a project to avoid an EIR. This then becomes applicant's response to a number of related arguments.

First, the Master Response takes a slanted approach to the law, narrowing the scope of both cumulative impact and the concept of impermissible piecemealing.

For purposes of cumulative impact, “any future project where the applicant has devoted significant time and financial resources to prepare for any regulatory review should be considered as probable future projects for the purposes of cumulative impact.” Gray v. County of Madera (2008) 167 Cal.App.4th 1099, at 1127-28. The CPC TT Decision’s approach of simply allowing applicant to disavow intent to building will not suffice.

For purposes of piecemealing, CEQA requires environmental review to evaluate the “whole of a project” and not simply its constituent parts when determining whether it will have a significant environmental effect. (CEQA Guidelines § 15003(h).) Further, “environmental considerations do not become submerged by chopping a large project into many little ones -- each with a minimal potential impact on the environment -- which cumulatively may have disastrous consequences.” (Bozung v. Local Agency Formation Commission (1975) 13 Cal. 3d 263, 283-284.) The court in Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214 set out three items to be used to determine what constitutes the whole of a project: (1) relationship in time, (2) physical location; and (3) the entity undertaking the action. (Id. at 1227.)

From there, the Master Response, which the City simply adopts as its reasoning, neglects to analyze, the facts presented by the community as against the law. The undisputed, inconvenient and unique facts which must be considered to determine whether the cumulative impact of applicant’s proposed projects at 220 Culver and 6819 Pacific must be evaluated and/or applicant is “piecemealing” and some or all of applicant’s projects should be considered as one project for evaluating impacts, include:

1. Applicant owns or is under common control with the parties which own the last three vacant lots in lower Playa del Rey, all within a few blocks of each other— Ed Czucker is the manager and signatory for all of the single purpose entities which own these properties (Legado del Mar, LLC, Legado Pacifico, LLC and Playa Legado, LLC);
2. The TT Determination admits this common ownership in the course of allowing applicant to disavow intent to build on the lots;
3. There has been no secret made by any of applicant’s representatives of this common ownership and it has been discussed at public meetings in my presence;
4. Applicant has sought consultation/Geotechnical review and received comments on the Geotechnical review from the Department of Building and Safety for its proposed project at 220 Culver LEG 2864;
5. Applicant sued its former Chief Operating Officer for failure to obtain approvals for 220 Culver and 6819 Pacific and detailed his futile, although no doubt expensive, efforts in the Complaint LEG 2526-2583;
6. Applicant paid a traffic consultant to prepare a study for each of 220 Culver and 6819 Pacific;

7. Applicant proposes to use the 220 Culver lot to mitigate environmental contaminant migration as part of construction on the 138 Culver property (Master Response to Comments pg. 2) LEG 11;
8. Applicant proposes to use 220 Culver to stage for the 138 Culver project and explained this at a Neighborhood Council meeting which I attended in December 2013;
9. Applicant listed the 220 Culver and 6819 Pacific project in the IS/MND as a projects for which cumulative impact should be considered both for traffic and for visual impact and provided descriptions of these projects together with trip count data from technical reports prepared by Hirsch Green Transportation for each project in October 2010 LEG 1951;
10. Applicant's representatives have on multiple occasions told community members exactly what applicant will build on 220 Culver once approval is obtained for 138 Culver;
11. As described by Elise Slifkin McClure at the Advisory Agency and Director's Hearing, the plans for 138 Culver and 220 Culver bear a striking resemblance and appear as two phases of the same project;
12. The 138 Culver Project, existing 200 Culver owned by applicant and 220 Culver as proposed by applicant create an essentially continuous façade across the South side of Culver; and
13. The descriptions of the project at 220 Culver are all consistent in the Geotechnical review sought from the City and the IS/MND—sort of a miracle if applicant has no clear plan to build on the 220 Culver lot.

Taken together, these fact, analyzed under the case law provided by applicant as supplemented above, prove that the construction at 138 Culver and 220 Culver is a single related project, being built in phases, and that applicant is piecemealing to avoid an EIR for all of the planned development in lower Playa del Rey. The projects are proximate in space, will overlap in time (with staging and remediation done on one to support development of the other) and share common ownership. The IS/MND provides no analysis of 138 Culver and 220 Culver as a single project being built in multiple phases and is therefore inadequate.

For example, the traffic impacts of both projects considered as a single project qualify as significant at the Nicholson/Culver intersection and require the significant mitigation of improving the intersection contemplated in applicant's original traffic report. My letter addressed this impact. LEG 229-230. Applicant's response was to rely on the Master Response regarding segmenting and then to refer back to the ways the 138 Culver project had reduced its traffic impact to avoid the required mitigation. Applicant offered no contradictory analysis to mine which showed if 138 Culver and 220 Culver are viewed as one project—using applicant's own methodology—the mitigation at Nicholson is again required as the additional trips for 220 Culver more than offset the reductions in trips applicant achieved at 138 Culver.

In addition, each of applicant's three projects have incurred significant expense towards development. Accordingly, development is reasonably foreseeable and the IS/MND is inadequate to the extent that it does not adequately disclose and evaluate cumulative impact.

Visual impact is of key concern. While the IS/MND calls out the cumulative visual impact of 220 Culver and 138 Culver, the document provides no further information or evaluation. Missing are such basic details as how tall applicant plans for 220 Culver to be which we learn is 60 feet by reading the Geotechnical Report (found by accident at the Department of Building and Safety). Similarly, we only learn about a massive underground garage even closer to the 310 Culver dry cleaning site in the Geotechnical Report for 220 Culver. Again, the cumulative impact is not disclosed or analyzed. The IS/MND is inadequate and EIR encompassing all of applicant's plans for his property in lower Playa del Rey is warranted.

### **Master Response 5: Visual Impact**

Applicant has prepared a visual impact report for 62 feet higher than the public view point on Vista del Mar and Montreal. The Director has found contrary to the statements of the Coastal Commission cited above that 4 story buildings abound in lower Playa del Rey, so applicant's building will fit in visually. Thus applicant can conclude that obliterating a view which the City's own Dual Force Main EIR found was so sensitive that even placing a temporary crane was a significant impact—is not a significant impact. I wrote a letter on this topic which applicant buried in the middle of all of the pages of the Venice Dual Force Main EIR, including the comments. Then acknowledged simply that I had filed the Venice Dual Force Main EIR. If they are hiding it—it must be good. LEG 518-523. I also refer to my prior letters related to visual impact found at LEG 2198-2200; LEG 2206-2217; LEG 2218-2241; and LEG 1387-1398. None of the arguments have been adequately addressed. Mr. Duhe's 3-D Model dispels any notion this building does not destroy a scenic resource forever. Certainly there is a reasonable argument of a substantial impact which requires an EIR to evaluate among other things mitigations.

### **Master Response 7: Storm Water and Flooding**

Adam Haussan is submitting a letter critiquing Kimley Horn's report on which applicant relies. Exhibit F. This is the same report which the CPC TT Decision now relies upon. No one responded to Mr. Haussan's comments which demonstrate a reasonable argument that this building will create incremental flood risk in lower Playa del Rey, a substantial impact, which must be disclosed, evaluated and mitigated through an EIR process.

I note two further additions to Mr. Haussan's response.

First, the one storm drain that engendered all the flooding in the pictures submitted by the Community, is the same storm drain which applicant plans to use for project dewatering. With project water going down the drain from 20-22 wells, at the rate of 140 to 180 gallons per minute, where is all the regular rain water going to go? If it rains during construction, the rest of

Playa del Rey will have no drainage capacity. This impact needs to be disclosed and evaluated in an EIR, so appropriate mitigation can be designed.

Second, the Kimley Horn report does not consider sea level rise. The preferred Coastal Commission models and parameters matching those applied by the Coastal Commission presented in Exhibit E show the project will be subject to sever flooding during its useful life as a result of sea level rise. This creates concerns regarding the stability of the building standing next to the Venice Dual Force Main with a basement filled with water. Again, between the Coastal Commission's analysis at 305-309 Ocean Front Walk, and a common sense understanding of the weight of water, we have a reasonable argument of a substantial environmental impact as sea level rise impact this project over its life which must be addressed in an EIR. A deferred further Geotechnical Report and then deferred mitigations will not suffice.

### **Master Response 8: Vapor Intrusion**

Applicant is pointing to a report written by a consultant who conducted a study at 138 Culver. No one is claiming that 138 Culver has a vapor intrusion problem yet. . . Dr. Deverel is claiming that changing the gradient of the groundwater as a result of dewatering can move the PCE plume from 310 Culver toward the project site, creating a vapor intrusion and health risk, for the rest of the community. In this regard, Dr. Deverel sounds in accord with the IS/MND which says the same thing.

### **Traffic Safety:**

Letter of Alan Kerstein LEG 286-287

Mr. Kerstein is eminently qualified, as the former Captain of the Pacific Division Traffic Division, to comment on what will and will not result in increased accident risk at a busy intersection. Mr. Kerstein is familiar with the beach going traffic patterns of lower Playa del Rey, which include rollerbladers, cyclist, skateboarders and pedestrians, and believes, as do many of the residents based on testimony and letters below, that placing a large building in this location will contribute to accidents and make them more likely. The line of sight study can demonstrate that the cars, if not distracted, will see each other. It cannot predict the rest of the beach going public. Moreover, the line of sight study was performed on the premise that the



project would be set-back from Vista del Mar. The original Tract Map required dedications on Vista del Mar. This is no longer the case and the conditions the line of sight study evaluated no longer adhere. This is a substantial impact and warrants further evaluation in an EIR.

Very truly yours,



Kathryn M. Schwertfeger

cc: Tricia Keane  
Krista Kline  
Mike Bonin

Exhibit A- Commercial Zone Scale and Character Study

Exhibit B- Letter Appel Design and Development dated June 13, 2018

Exhibit C- Applicant's Visual Impact Studies

Exhibit D- Emails November 2018 between Juliet Oh, Debbie Lawrence and Ben Reszik and Neil Brower regarding Sea Level Rise Study

Exhibit E- CoSMoS United States Geologic Service Sea Level Rise Models for 138 Culver

Exhibit F- Public Records Act Request dated April 9, 2015 and Response dated April 21, 2015 from Los Angeles Department of Building and Safety Regarding Methane Mitigation

Exhibit G- Letter dated June 9, 2018 from Adam Haussman discussing the Kimley Horn Report



August 9, 2018  
Los Angeles City Planning Commission  
4200 N. Spring Street, Room 532  
Los Angeles, CA 90013  
Attention: James K. Williams

RE: 138 Culver Boulevard Cases: TT-70784, ZA-2014-2220, CDP, ENV-2012,3534-EAF and DIR-2012-3537-D8-SPR-MEL

Dear Mr. Williams,

I herein provide responses to the comments provided Citadel on June 22 on the HydroFocus letter to the City of Los Angeles Planning Commission.

**Comment**

Dewatering. As stated in the Mitigated Negative Declaration (MND) and the approved soils report, the proposed project will require some temporary dewatering in order to construct the single subterranean parking level, which will reach a maximum depth of 11.51 feet below land surface (bgs). The groundwater varies from 15.79 to 17.65 feet below ground surface (bgs) in the vicinity of the project (EEC, 2015).

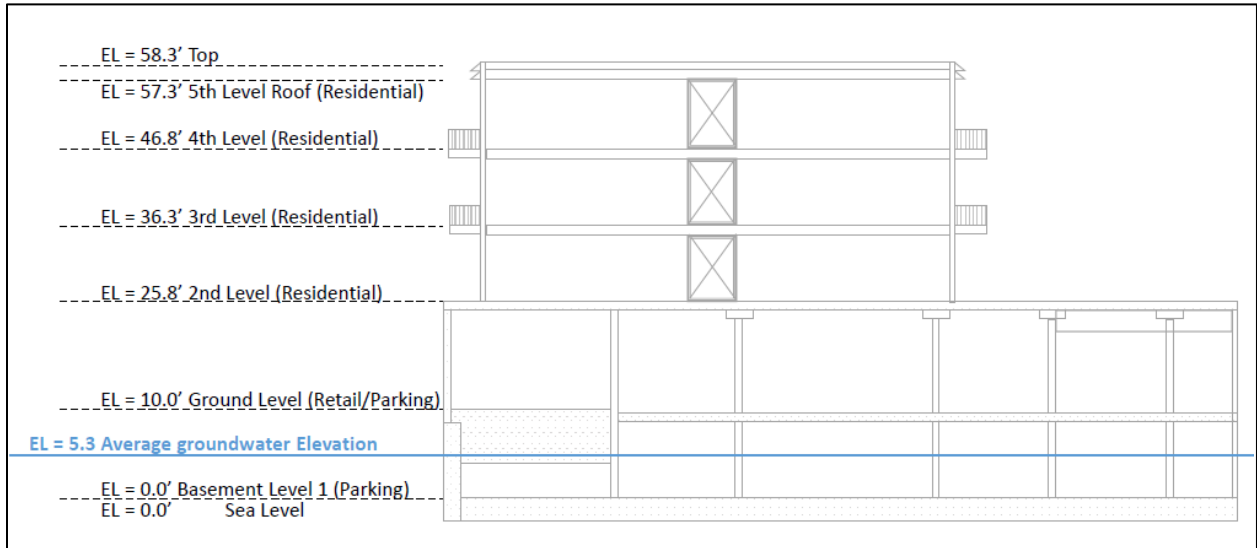
***Response***

*The ground level at the proposed project site is at an elevation of 10 feet above Mean Sea Level (MSL). The single story subterranean garage is therefore at 1.51 foot below MSL (10 feet – 11.51 feet = - 1.51 foot MSL). The EEC report provides groundwater elevation data for 3 wells at 138 Culver (TP-1, TW-1, TW-2) in Enclosure 3 of the report.*

*Groundwater elevations range from 5.21 to 5.48 feet above MSL or over 6.7 feet (5.21- (-1.51) = 6.7) above the bottom of the proposed single-story garage. I am unclear where Citadel obtained values of 15.79 and 17.65 feet bgs. (It appears that the values for Groundwater Elevations were added to the ground-surface elevation.)*

*Using the values in Enclosure 3, we calculate values ranging from 4.79 feet bgs (10 feet MSL – 5.21 feet MSL = 4.79 feet) and 4.52 feet bgs (10 feet MSL – 5.48 feet MSL = 4.52 feet). Figure 1 shows the relation of the proposed building geometry and ground-*

surface and ground-water elevations. Table 1 shows the groundwater data from the EEC report.



**Figure 1. Proposed building geometry and elevations for 138 Culver. The average groundwater elevation is based on the data shown in Table 1.**

**Table 1. Groundwater data from the EEC July 28, 2015 letter to Jeffer Mangels Butler and Mitchell, LLP. To calculate depth to groundwater below ground surface, subtract groundwater elevation from the ground elevation (10 feet above MSL) shown in Figure 1. The wells (Column 1) located at 138 Culver are TP-1, TW-1 and TW-2.**

Well ID	Date Guaged	TOC Elevation	DTW	Groundwater Elevation
TP-1	07/02/15	17.65	12.44	5.21
TW-1	07/02/15	16.01	10.73	5.28
TW-2	07/02/15	15.79	10.31	5.48
LMW-1S	07/02/15	13.73	8.44	5.29
LMW-1D	07/02/15	13.75	7.93	5.82
LMW-2S	07/02/15	18.47	12.16	6.31
LMW-2D	07/02/15	18.50	12.61	5.89

**Key:**

TOC = top of casing

DTW = depth to groundwater

**Comment**

However, there will be no need for permanent dewatering system (Citadel, 2015), and no permanent dewatering system is proposed.

***Response***

*The existing documentation for the project for methane mitigation indicates a permanent dewatering system. The 2011 Application for Building Permit and associated documents in which 138 Culver Associates, LLC of 8383 Wilshire Blvd 630, Beverly Hills, is listed as the property owner, specified the methane site design level as II. Moreover, the specification of vent risers, gravel blanket, impervious membrane in the Application for Building Permit, is consistent with a passive system requiring a permanent dewatering system in Table 71<sup>1</sup>. Based in the available information, I deemed it reasonable to assume that a permanent dewatering system will be operative as part of the methane mitigation system. There is no available documentation for a system proposed at the site that does not employ permanent dewatering.*

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<sup>1</sup> Ordinance 175790 Section 91.106.4.1 and Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code

**Comment**

In a June 8<sup>th</sup> 2018 report submitted by Hydrofocus, they suggest that there will be a need for dewatering. This dewatering will impact groundwater levels at a nearby historical dry cleaner that has been documented to have released volatile organic compounds (VOCs) to the subsurface. As a preliminary matter, Hydrofocus’ analysis and conclusions depend upon permanent dewatering, and although they reference the correct current depth of the parking structure, their dewatering assumptions still assume two subterranean levels. Both assumptions are false and leave Hydrofocus’ conclusions unsupported by evidence.

***Response***

*As stated above, I assumed permanent dewatering for methane mitigation. Documentation of a methane mitigation system that does not rely on permanent dewatering has not been forthcoming.*

*I did not assume two subterranean levels. The complete text from the HydroFocus letter is as follows. “Also, dewatering will be required for construction as the groundwater level is above the bottom of the proposed single-story underground garage. Specifically, the bottom of the single-story garage [emphasis added] is 10 feet below land surface. Land surface elevation is 10 feet above mean sea level. Underneath the garage, a concrete slab is planned. It is therefore reasonable to assume a depth of excavation of about 11.5 feet below ground surface”.*

*In relation to the VOC groundwater contamination at the Del Rey cleaners, the potential effect on the movement of the contaminated groundwater is due to estimated ten-fold increase in the hydraulic gradient due to dewatering relative to existing conditions. The hydraulic gradient is the driving force for groundwater movement. This increase in the hydraulic gradient will occur during dewatering.*

**Comment**

Further as previously discussed, the dry cleaner is more than 500 feet way from the project site and has been shown previous reports (Citadel, 2015) that there will be de minimis impacts placed upon this contamination plume during the temporary dewatering efforts required for construction plume during the temporary efforts required for construction.

***Response***

*In the March 2015 Citadel report<sup>2</sup>, I find no language documenting de minimis impacts. In contrast on pages 9 – 12 of the report, Citadel provides several mechanisms to “provide a safety factor from altering the natural local hydrology; provide significant cost savings for the treatment and disposal of groundwater; and address community*

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<sup>2</sup> Citadel Environmental Services, March 2015, Letter to Heather Lee, Legado Companies, Legado Del Mar Project



concerns.” Citadel provided examples of barriers, “to ensure that potentially contaminated groundwater from the former dry-cleaning property does not migrate towards the proposed project from dewatering activities”.

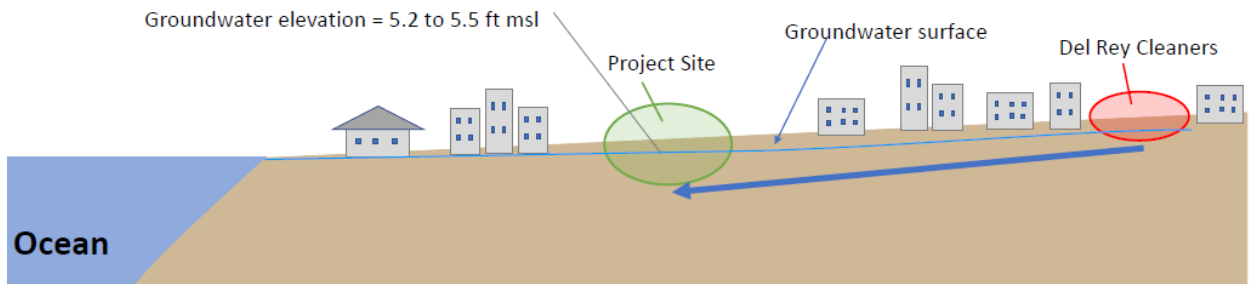
On page 11, Citadel suggests data collection will allow for the construction of a groundwater model which could/will be used to model the proposed dewatering activities. “The model will allow for the dewatering plans to be tested including various and potential remedial options.” On page 12, Citadel stated that “The data collected from the aquifer test will provide the information, which is currently deficient, to construct a model and **properly assess** [emphasis added] the potential of the VOC plume migration as a result of the dewatering activities”.

### **Comment**

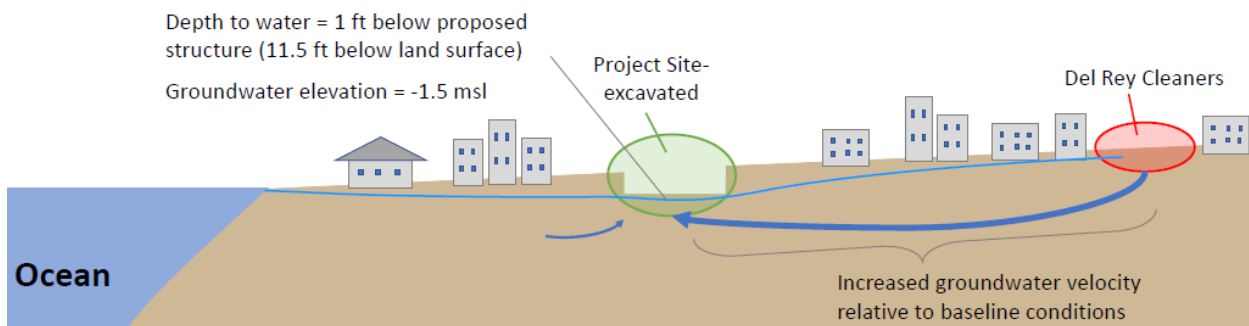
Based upon the local hydrogeology and hydrology, Ballona Creek and the Pacific Ocean are the driving forces around groundwater movement within the area of the project. Hydrofocus’ analysis fails to recognize or account for those factors, rendering the associated conclusions unsupported with any evidence. This in conjunction with the nature of the geologic material (silty-sand), the change will be less than significant. As the dewatering will be above the confining zone, the Pacific Ocean and the tidal changes will be of greater concern than the project dewatering.

### **Response**

While these factors are considerations that should be taken into account in evaluating the overall effects of dewatering, it is important to recognize that dewatering will create a local groundwater depression which will substantially alter groundwater flow to a greater extent than tidal influences or Ballona Creek. These influences result in a rise and fall and the groundwater table but not have a net effect on the hydraulic gradient from the Del Rey site to 138 Culver. Based on my calculations, dewatering will increase the hydraulic gradient, the driving force for groundwater movement, tenfold. Figure 2 provides a simplified conceptual illustration of this effect.



**Figure 2a.** Under current conditions, based on existing data, the direction of groundwater flow is from the Del Rey Cleaners site towards the Pacific Ocean (Baseline Scenario). Based on data for the Del Rey site and 138 Culver, the groundwater surface is gently sloping towards the west.



**Figure 2b.** With excavation, the groundwater surface will be lowered and will result in increased groundwater movement toward 138 Culver and increased groundwater velocities relative to baseline conditions.

**Comment**

Moreover, and as stated in our prior correspondence, methods of isolating any hydraulic effect of dewatering to Project Site are available and commonly used, and HydroFocus fails to acknowledge them.

**Response**

*I recognize the potential benefit of isolation. However, there is no documentation stating that these measures will be implemented. Citadel appears to be presenting three opposing arguments in their comments. First, they stated that the groundwater is below the bottom on the building. Second, they stated that effects of dewatering will be de minimis. Third, they indicate that methods of isolating effects of dewatering are needed. Yet a fourth position was stated in the March 2015 Citadel report; collect data, develop a model and analyze the effects.*

### **Comment**

Additionally, HydroFocus does not discuss the natural attenuation of the VOC contamination and/or provide any type of analysis to determine the fate and transport of the VOC contamination. As such, there is no evidence to support HydroFocus' speculation that the plume will migrate towards the project site.

### ***Response***

*While natural attention likely occurs, the concentrations at the Del Rey site are sufficiently high to warrant further analysis with respect to effects of dewatering and increased groundwater velocities. For example, recent and historic groundwater, soil and soil vapor concentrations are sufficiently high that the presence of a PCE non-aqueous phase liquid (DNAPL) is indicated<sup>3</sup>. In other words, the as per Regional Water Quality Control Board documents, data indicate the presence of PCE in a form that is akin to undiluted product that is denser than water yet not dissolved in water<sup>4</sup>.*

*Consistently, using guidelines in Cohen and others<sup>5</sup>, the measured groundwater concentration of 43.5 mg/L PCE under the Del Rey site indicates the presence of the DNAPL. This value is about 30% of the solubility of PCE in groundwater which is well above the 10% of the aqueous solubility in groundwater documented in Cohen and others<sup>6</sup> as evidence for the presence of a DNAPL.*

*DNAPLs sink into groundwater and can rest on below-surface clays as is conceptually illustrated in Figure 3. If not removed, DNAPLs can be an ongoing source of contamination in a dissolved contaminant plume. Based on the available documentation for the Del Rey site, the Regional Water Quality Control Board does not see natural attenuation as a viable remedial solution for the Del Rey contamination. As I recommended in my report, effects of dewatering should be coordinated with plans for site remediation.*

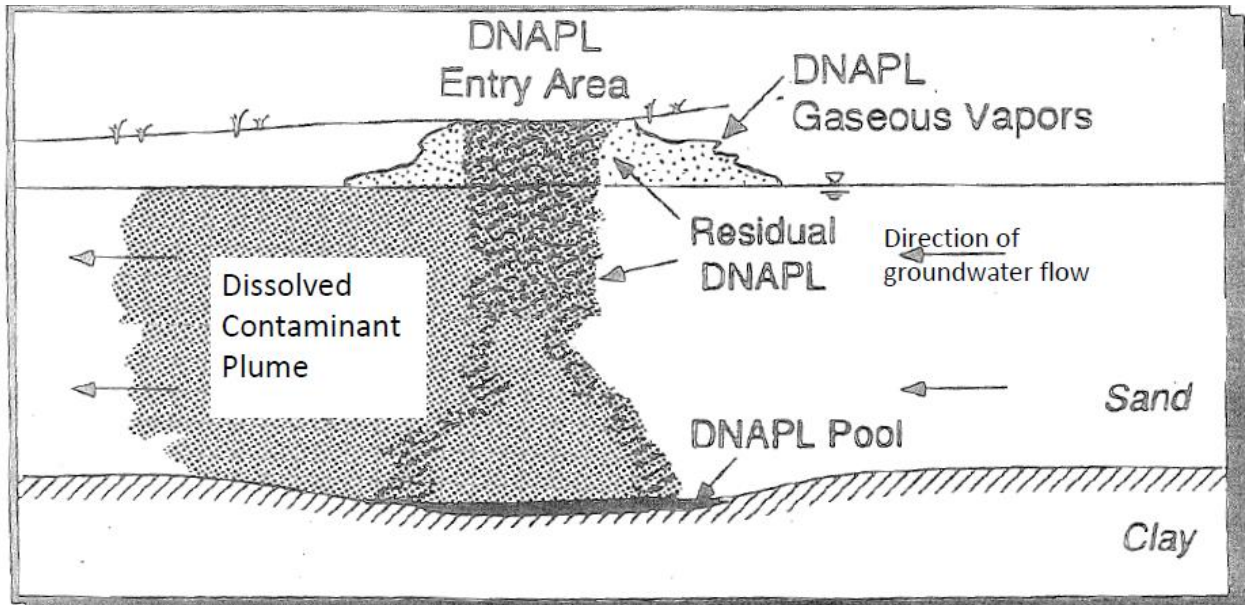
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<sup>3</sup>E.g. BEC, 2014, Limited Investigation Summary Former Del Rey Cleaners

<sup>4</sup>From Regional Board document – Proposed project summary for SCP number 0997 Del Rey Cleaners Site, written communication from Christina Humphreys, Water Resource Control Engineer, Los Angeles Regional Water Quality Control Board, May 2018.

<sup>5</sup> Cohen, Robert M., Mercer, James W., Mathews, John, 1993, DNAPL Site Investigation, CRC Press, Boca Raton Florida

<sup>6</sup> ibid



**Figure 3. Conceptual model of Dense Non-aqueous Phase Liquid (DNAPL) in groundwater. Residual DNAPL sinks in the groundwater and can be an ongoing source of dissolved contaminants in the groundwater. Figure 3 was modified from Cohen and others<sup>7</sup>.**

**Comment**

Secondly, with Ballona Creek upgradient recharge would have a significantly greater impact on this plume than the temporary dewatering some 500 plus feet away towards the Pacific Ocean, a major factor HydroFocus simply failed to consider.

**Response**

*If Ballona Creek were a source of recharge, it could be an influencing factor. However, Phillip Williams and Associates<sup>8</sup> stated that Ballona Creek is a discharge area. It is highly unlikely that groundwater discharge to Ballona Creek would have a greater effect of dewatering at 138 Culver as indicated in Figure 2.*

**Comment**

Hydrofocus also speculates that the dewatering would have an impact on the Ballona wetland.

**Response**

*To be precise, in my 2014 letter, I stated that Site dewatering may alter the groundwater hydrology at the Ballona Wetlands which in turn may result in altered water quality. In*

<sup>7</sup> ibid

<sup>8</sup> Phillip Williams and Associates, 2006, Ballona Wetland Existing Conditions, FINAL Report, prepared for the California State Coastal Conservancy

*the 2018 letter, I stated that additional data collection will provide necessary and more reliable information about subsurface water transmitting and storage properties, and the use and development of a model will lead to essential information about the effects of dewatering. These statements are consistent with Citadel's 2015 report as discussed above.*

**Comment**

As the project site sits closer to the Pacific Ocean than the wetlands and the existence of multiple fine grained to clay unite beneath the project site and the upgradient nature of the project, there is less than significant potential for any impacts to the wetland area.

***Response***

*In the 2014 HydroFocus letter to the City of Los Angeles, calculations were provided that indicated a potential effect on groundwater levels in the Ballona Wetlands. These were in general agreement with the calculations provided by Terra Costa.*

**Comment**

Despite the efforts of HydroFocus to call into question the hydraulic conductivity values used in previous work, once again they provide no evidence that any impacts will manifest or what those impacts would be. The work performed previously by Citadel (2015) more than adequately describes the geologic, hydrogeologic and hydrology system and provides a range of values and what if any impacts would be associated with the project. In all circumstances these impacts are de minimis, and HydroFocus fails to provide support for its bare assertion to the contrary.

***Response***

*I cannot find any language that describes effects or lack of effects on the project on the Ballona Wetlands in the 2015 Citadel report.*

**Comment**

Methane: The project site is located within the city of Los Angeles methane zone, which may require a methane mitigation system. However, this can be – and commonly is – mitigated by membrane and a simple venting and methane detection system. There is no need for permanent dewatering as this would only enhance the migration of methane as seen in the Playa Vista project in the early 2000s. The city of Los Angeles has in place methane mitigation methods and performance standards that the project will have to meet and/or exceed. Therefore, methane issue will have de minimis impact to the project, and assertions to the contrary are unsupported. HydroFocus tries to use the dewatering efforts as a way to bring methane mitigation into the project but each assertion remains unsupported. This has already been addressed adequately through simple engineering.

Response

*Engineering for methane mitigation is heretofore undocumented.*

**Comment**

Additional Comments: HydroFocus also brings up the potential for vapor intrusion. Although this may represent a potential problem for the properties near 310 Culver, where the plume actually lies. HydroFocus provides no data or analysis to support their assertion that this even exists or what if any impact the proposed project site construction from over 500 feet away will have on the VOC contamination. As there is no reference to natural attenuation of the VOC contamination, which most certainly has occurred, as evidenced by the tertiary breakdown products HydroFocus itself acknowledges. After 10+ plus years in the subsurface the contamination would be less than was previously reported, particularly given the current evidence of the natural breakdown of those contaminants.

Response

*If the contaminated groundwater moves toward the site at an accelerated rate due to dewatering, there is the potential for contaminated shallow groundwater to move under neighboring buildings and vapor intrusion may occur. As discussed above, the soil and groundwater concentrations at the Del Rey site are sufficiently high as indicate undiluted PCE and can serve as an ongoing source to the dissolved contaminant plume (Figure 3).*

I conclude that the need remains for additional investigation and environmental analysis is necessary to resolve the potential for hydrologic effects of dewatering.

Thank you for the opportunity to provide responses to Citadel's comments.

Sincerely,



Steven Deverel, Ph.D. P.G  
Principal Hydrologist  
HydroFocus, Inc.





EXHIBIT A

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Commercial District Summary

10 Parking Lots; 20 1 Story; 20 2 Story\*; 5 3 Story; 1 4 Story  
 Total Buildings: 46

Not counting parking lots:

- 4 Story buildings represent 1 out of 46 or 2%
- Buildings exceeding 37 feet represent 3 out of 46 or 6%, with those built after the Coastal Act representing 2% or 1 out of 56
- Buildings less than 20 feet are 26 out of 46 or 56%
- Buildings 20-30 feet are 11 out of 46 or 24%
- In excess of 70% of the Buildings are 30 feet or under
- Buildings 30-37 feet are 6 out of 46 or 13%

\*Building Permit Rules for stories result in some partial underground garages which are not counted as stories if there is no habitable space but buildings which are taller. Accordingly, for two story buildings heights are listed.

Over 37 Feet: 1 pre-coastal at 45 feet; 1 post-coastal at 44 feet but it's a Hotel (highly preferred use)

	Address	Description	Stories	Height (3 stories or over)*	Sq.Ft. Building	Sq. Ft. Lot	Year Built
1	6805 Vista del Mar	Restaurant/Bar	1		1,001	5,667	1957
2	6935 Trolley Pl	Restaurant	1		1,750	3,012	1973
3	6934 S. Trolley	Duplex	3	45 <sup>1</sup>	?	?	1973
4	104 Culver	Duplex	2	18	1,748	2,167	1957
5	108-110 Culver	Duplex	2	18	1,748	2,184	1957
6	112 Culver	Duplex	3	33 <sup>2</sup>	3,628	2,171	2003
7	119 Culver	Restaurant/Bar	1		6,157	13,909	1960
8	129 Culver	Parking Lot	N/A		N/A	5,000	N/A
9	143 Culver	Healing Center	2	20'6" <sup>3</sup>	1,826	1,113	1965
10	165 Culver	Commercial	2	22 <sup>4</sup>	2,692	2,233	1980
11	177 Culver	Yoga Studio	1		1,742	2,046	1925
12	179 to 181 Culver	Store/Residential	2	30 <sup>5</sup>	3,174	1,964	1911
13	185 Culver	Restaurant/Bar	1		1,625	2,577	1948
14	195 Culver	Restaurant/Bar	1		2,180	?	1956
15	200 Culver	Coffee Shop/Office	2	33 <sup>6</sup>	11,937	6,498	1947

<sup>1</sup> Data source: Coastal Commission Permit for 112 Culver.

<sup>2</sup> Data Source: Coastal Commission Permit-

<sup>3</sup> Building Permit

<sup>4</sup> Building Permit

<sup>5</sup> Building Permit

<sup>6</sup> Building Permit

16	201-225 Culver Culver	Retail/Restaurant/Parking	2	20 <sup>7</sup>	19,326	?	1959
17	214 Culver	Parking Lot	N/A		N/A	2,127	N/A
18	224 Culver	Parking Lot	N/A		N/A	3,188	N/A
19	230 Culver	Restaurant/Parking /Residential	1		2,736	16,575	Multiple
20	301 Culver	Grocery/Residential	1		6,441	10,001	1946
21	310 Culver	Dry Cleaners	1		2,521	4,057	1953
22	314 Culver	Store/Residential	1		2,080	1,755	1950
23	315 Culver	Office Building	3	37 <sup>8</sup>	6,165	5,000	2014
24	316 Culver	Store/Office	2	14 <sup>9</sup>	2,720	1,784	2015
25	317 Culver	Retail	1		1,400	2,500	1955
26	318-322-1/2 Culver	Store/Residential	2	18 <sup>10</sup>	7,601	5,529	1962
27	32_ Culver	Parking Lot	N/A		0	2,500	N/A
28	323 Culver	Mixed Use	1		4,046	5,001	1955
29	324 Culver	Retail	1		1,000	1,902	1948
30	33_1, 329 and 327 Culver	Apartment	2	25 <sup>11</sup>	10,285	7,277	1950
31	333, 333-1/2 Culver	Apartment	1		5,368	4,070	1970
32	335 Culver	Restaurant, Bar	1		857	2,351	1955
33	337 Culver	Restaurant, Bar	1		934	2,500	1954
34	339 Culver	Vacant Lot/Parking	N/A		N/A	2,501	N/A
35	341 Culver	Restaurant	1		2,100	2,500	1954
36	342 Culver	Apartment	2	30 <sup>12</sup>	6,388	4,305	1973
37	343 Culver	Restaurant	1		2,295	2,506	1962
38	400 Culver	Apartment	2	25 <sup>13</sup>	6,615	2,256	1972
39	402 Culver	Parking Lot	N/A		N/A	2,286	N/A
40	40_ Culver	Apartment	2	25 <sup>14</sup>	8,828	7,061	1968
41	405 Culver	Apartment	3	38 <sup>7,15</sup>	19,860	12,115	1970
42	411 Culver	Office	2 <sup>16</sup>		4,392	2,501	1956
43	412 Culver	Apartment	2	25 <sup>17</sup>	8,960	8,241	1968
44	420 Culver	Office	3	37 <sup>18</sup>	8,633	10,622	1986
45	423 Culver	Restaurant	1		429	2,500	1952
46	424 Culver	Parking Lot	N/A		N/A	N/A	N/A
47	425 Culver	Duplex	2	16	3,302	2,501	1968

7 Building Permit

8 Data Source: Coastal Commission Permit-

9 Building permit

10 Building Permit

11 Building Permit

12 Building Permit

13 Building Permit

14 Building Permit

15 Building Permit

16 Building Permit/Relocation

17 Building Permit

18 Building Permit

48	426 Culver	Single Family(Office Use)	2	28 <sup>19</sup>	2,222	2,425	1985
49	427 Culver	Mixed Use	2	22 <sup>20</sup>	1,576	2,500	1963
50	428 Culver	Single Family(Office Use)	2	28 <sup>21</sup>	2,222	2,480	1985
51	429 Culver	Parking Lot	N/A		N/A	2,501	N/A
52	430 Culver	Parking Lot	N/A		N/A	2,535	N/A
53	431 Culver	Restaurant	1		2,500	2,500	1964
54	432 Culver	Office	2	21 <sup>22</sup>	3,482	5,236	1976
55	433 Culver	Parking Lot	N/A		N/A	2,501	N/A
56	435 Culver	Hotel	4	44 <sup>23</sup>	19,325	4,793	1995

Additional Data Sources: PropertyShark and ZIMAS to obtain addresses and visual assessment of stories.

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<sup>19</sup> Building Permit

<sup>20</sup> Building Permit

<sup>21</sup> Building Permit

<sup>22</sup> Building Permit

<sup>23</sup> Building Permit





# 1 APPLICATION TO CONSTRUCT NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

1. LEGAL LOT <b>4</b>	BLK. <b>21</b>	TRACT <b>8573</b>	DIST. MAP <b>7194</b>
JOB ADDRESS <b>104-106 Culver Boulevard, Playa del Rey</b>		APPROVED	
2. BETWEEN CROSS STREETS <b>Vista del Mar AND Trolleyway</b>			
3. PURPOSE OF BUILDING <b>2-Family Residence and double garage</b>			
4. OWNER <b>Morehart Land Company</b>		PHONE <b>Granite 76717</b>	
5. OWNER'S ADDRESS <b>11661 Wilshire Blvd.</b>		P.O. ZONE <b>Los Angeles 25</b>	
6. CERT. ARCH. <b>Henry J. Friel, A.I.A.</b>		STATE LICENSE PHONE <b>RB 55152</b>	
7. LIC. ENGR. <b>Morehart Land Company</b>		STATE LICENSE PHONE <b>110965 OR 76717</b>	
9. CONTRACTOR'S ADDRESS <b>11661 Wilshire Blvd.</b>		P.O. ZONE <b>Los Angeles 25</b>	
10. SIZE OF NEW BLDG. STORIES HEIGHT <b>19 x 65 2 18</b>		NO. OF EXISTING BUILDINGS ON LOT AND USE <b>None</b>	
11. MATERIAL EXT. WALLS: <input checked="" type="checkbox"/> WOOD <input type="checkbox"/> METAL <input type="checkbox"/> CONG. BLOCK <input type="checkbox"/> ROOF <input checked="" type="checkbox"/> STUCCO <input type="checkbox"/> BRICK <input type="checkbox"/> CONCRETE		ROOFING <b>Rock</b> DISTRICT OFFICE <b>VENICE</b>	
1. VALIDATION <b>V166830</b>			
TYPE <b>V</b>		GROUP <b>2 Fam.</b>	
C.O.F.O. ISSUED <b>OCT 16 1957</b>		MAX. OCC. <b>2 Fam.</b>	
INSPECTOR		S.P.C. <b>6000</b>	
12. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING.		P.C. <b>6000</b> S.P.C. <b>6000</b> O.S. <b>1900</b> I.F. <b>1900</b> C/O <b>1900</b>	
<b>\$12,500.00</b>		<b>48000</b>	
<b>5 of 5 405000</b>		<b>48000</b>	
I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.			
<b>T.E. Montman</b>		SIGNED	
This Form When Properly Validated is a Permit to Do the Work Described.			
INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.			

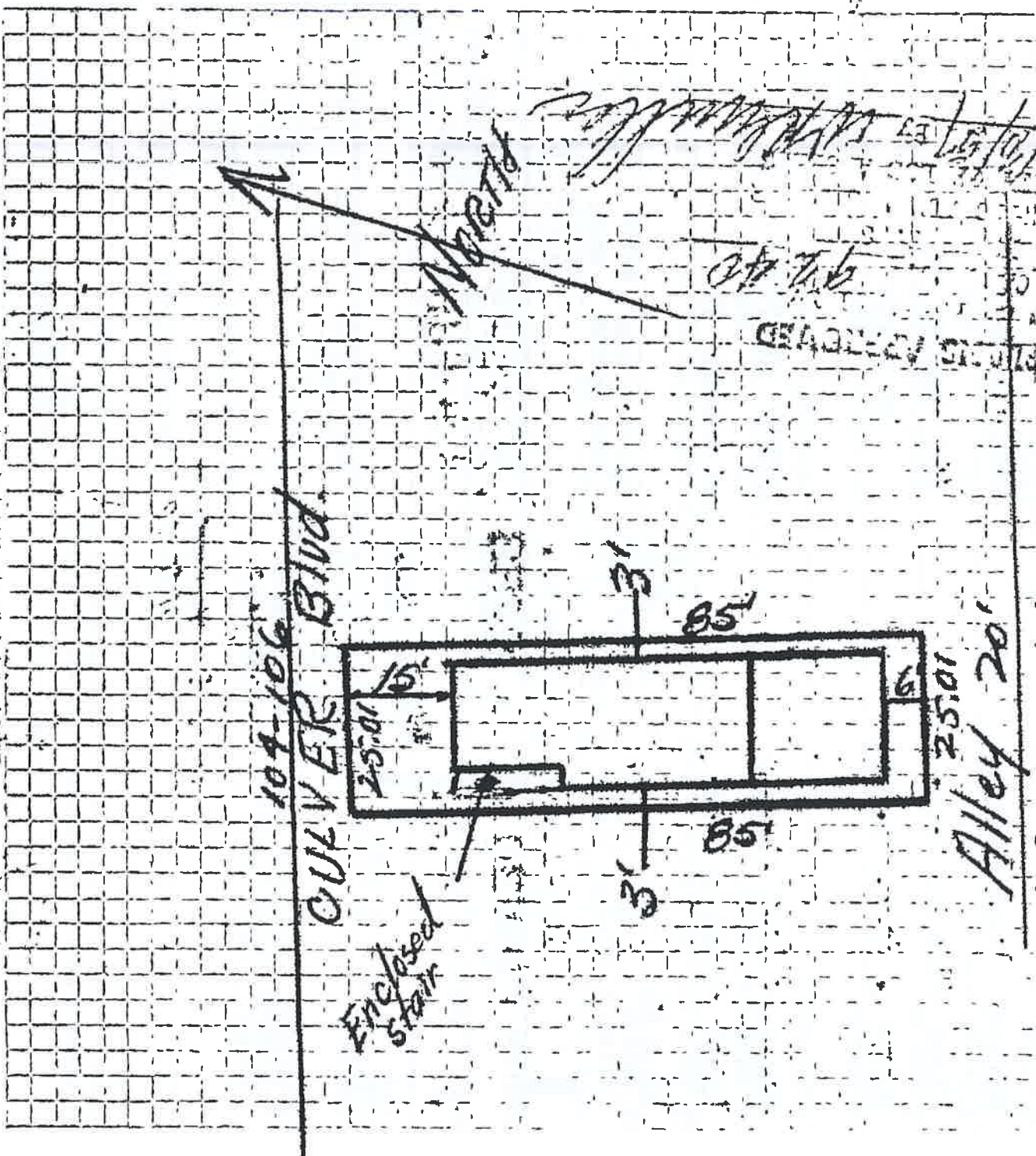
*No. 6 x 10 1/2 in. 3-13-57*

UNSEEN AVAILABLE



Lot 9 - Block 1 - Tract 8573  
OR 104-106 Culver Blvd.

ON PLOT PLAN SHOW ALL BUILDINGS ON LOT AND USE OF EACH



DATE 4/10/15  
SCALE 1" = 10'-0"  
DRAWN BY [Signature]  
CHECKED BY [Signature]



**APPLICATION TO CONSTRUCT NEW BUILDING  
AND FOR CERTIFICATE OF OCCUPANCY**

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

1. <b>LEGAL LOT</b>	BLK. <b>1</b>	TRACT <b>8573</b>	APPROVED	DIST. MAP <b>7194</b>	ZONE <b>C-1</b>
2. <b>JOB ADDRESS</b> <b>108-110 Culver Boulevard, Playa del Rey</b>					
3. <b>PURPOSE OF BUILDING</b> <b>Vista del Mar AND Trolleyway</b>					FIRE DIST. <b>II 40</b>
4. <b>OWNER</b> <b>2 Family Residence and double garage</b>					INSIDE KEY
5. <b>OWNER'S ADDRESS</b> <b>Morehart Land Company</b>			PHONE <b>GRandite 76717</b>		COR. LOT
6. <b>CERT. ARCH.</b> <b>11661 Wilshire Blvd.</b>			P.O. <b>Los Angeles 25</b>		REV. COR. <b>25 x 85</b>
7. <b>LIC. ENGR.</b> <b>Henry J. Friel, A.I.A.</b>			STATE LICENSE <b>FR 55152</b>		LOT SIZE <b>REAR ALLEY 20</b>
8. <b>CONTRACTOR</b> <b>Morehart Land Company</b>			STATE LICENSE <b>110965</b>	PHONE <b>OR 76717</b>	SIDE ALLEY
9. <b>CONTRACTOR'S ADDRESS</b> <b>11661 Wilshire Blvd.</b>			P.O. <b>Los Angeles 25</b>		BLDG. LINE
10. <b>SIZE OF NEW BLDG.</b> <b>19 x 65</b>			NO. OF EXISTING BUILDINGS ON LOT AND USE <b>None</b>		AFFIDAVITS
11. <b>MATERIAL EXT. WALLS:</b> <input checked="" type="checkbox"/> WOOD STUCCO <input type="checkbox"/> METAL BRICK <input type="checkbox"/> CONC. BLOCK CONCRETE			ROOF CONST. <input checked="" type="checkbox"/> WOOD <input type="checkbox"/> CONC. <input type="checkbox"/> STEEL OTHER	ROOFING <b>Rock</b>	SPRINKLERS RED'D. SPECIFIED
1. <b>VALIDATION</b> <b>V16631</b>			108-110 Culver Blvd.		
TYPE <b>V</b>			CASHIER'S USE ONLY <b>V16631-3-12-57</b> <b>8 1857</b>		
C. OF O. ISSUED <b>SEP 25 1957</b>			P.C. <b>60 00</b>	S.P.C. <b>S.P.C.</b>	D.P. <b>Self.</b>
INSPECTOR <b>Tookaras</b>			O.S. <b>C/O</b>		
12. <b>VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING.</b> <b>2 of 3 485000</b> <b>48000</b>			VALUATION APPROVED		
I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.  <b>T.E. Winters</b> SIGNED			DWELL. UNITS		
			PARKING SPACES		
			GUEST ROOMS		
			FILE WITH		
This Form When Properly Validated is a Permit to Do the Work Described.			CORRECTIONS VERIFIED <b>Self</b>		
No. <b>CARDING PERMITS</b>			PLANS APPROVED		
			APPLICATION APPROVED		

**SEWERS AVAILABLE**

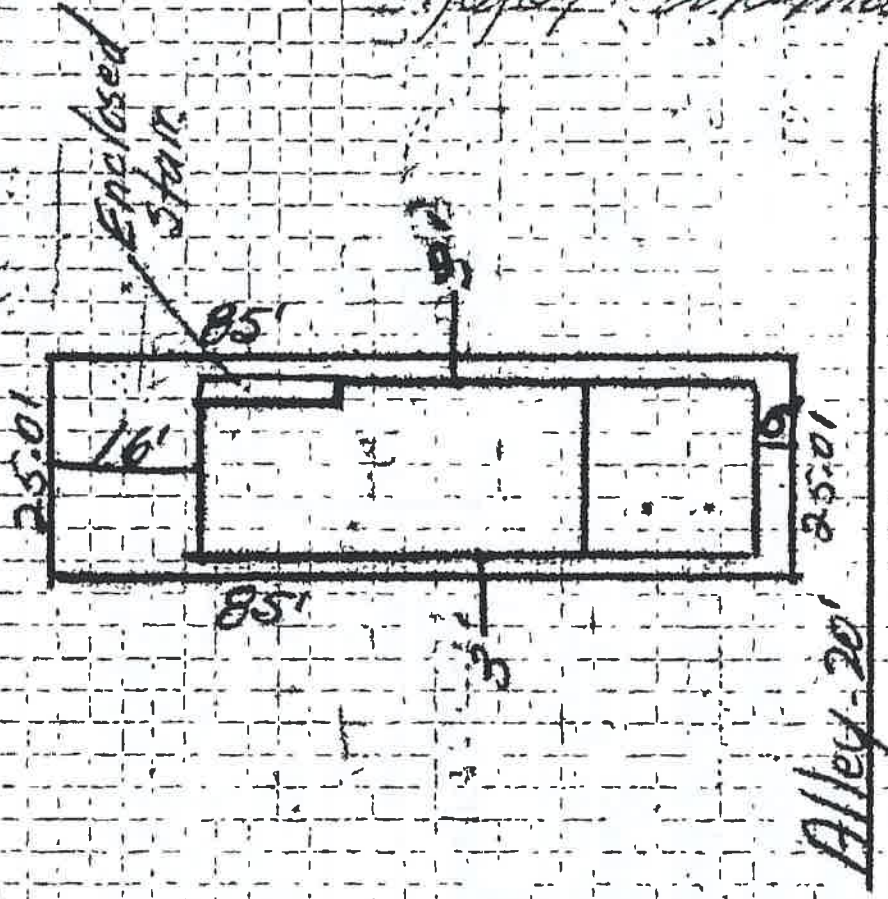
Form B-1a **3-13-57**  
INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.



LEGAL DESCRIPTION  
Lot 3- Block 1- Tract 8573  
OR 108-110 Culver Blvd.

ON PLOT PLAN SHOW ALL BUILDINGS ON LOT AND USE OF EACH

Culver Blvd



PLANS APPROVED

4/1

4740

4/3/57 W. W. Sullivan

Alley 20'





# 1 No A/D

## APPLICATION TO CONSTRUCT NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY

CAS Form B-3

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LEGAL DESCR.	LOT	BLK.	TRACT	ADDRESS APPROVED
	13 (See Back)		8820	DHB
2. JOB ADDRESS	143 Culver Blvd.			
3. BETWEEN CROSS STREETS	E Esplanade AND Pacific Ave.			
4. PURPOSE OF BUILDING	Store & office (13)			
5. OWNER'S NAME	PHONE			
6. OWNER'S ADDRESS	P.O. BOX			
7. CERT. ARCH.	STATE LICENSE NO. PHONE			
8. LIC. ENGR.	STATE LICENSE NO. PHONE			
9. CONTRACTOR	STATE LICENSE NO. PHONE			
10. CONTRACTOR'S ADDRESS	P.O. BOX			
11. SIZE OF NEW BLDG.	STORIES	HEIGHT	#NO. OF EXISTING BUILDINGS ON LOT AND USE	
45 x 30	2	20'6"	None	

12. MATERIAL	<input type="checkbox"/> WOOD	<input type="checkbox"/> METAL	<input checked="" type="checkbox"/> CONG. BLOCK	ROOF	<input type="checkbox"/> WOOD	<input type="checkbox"/> STEEL ROOFING
EXT. WALLS:	<input checked="" type="checkbox"/> STUCCO	<input type="checkbox"/> BRICK	<input type="checkbox"/> CONCRETE	CONST.	<input type="checkbox"/> CONG.	<input type="checkbox"/> OTHER COMPT
13. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING.	\$ 20,000.00					
Approval of driveway location must be obtained from the Department of Public Works before securing Building Permit.						
I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance, and I have read reverse side of application.						
Signed <u>Quincy K. Rouben</u>						
This Form When Properly Validated is a Permit to Do the Work Described.						

TYPE	GROUP	MAX. OCC.	P.C.	S.P.C.	G.P.I.	B.P. OCC	I.F.	O.S.	C/O
V	4-1	61	53.30			82.00			
DEC-11-64 31328 C - 3 CK 53.30									
JAN-6-65 55210W									
JAN-6-65 00349 B - 1 CK 82.00									
P.C. No. 604 GRADING CRIT. SOIL CONS.									

CASHIER'S USE ONLY

CRITICAL SOIL

DISTRICT OFFICE

WLA

SPRINKLES REQD. SPECIFIED AFFIDAVITS

None

DWELL. UNITS

SPACES PARKING

GUEST ROOMS

FILE WITH

CONT. INSP.

C/O







**APPLICATION FOR INSPECTION OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY**  
 CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY  
 INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LOT LEGAL DESC. 16 BLK 5 TRACT Playa Del Rey DIST. MAP 7194 CENSUS TRACT 2781.00 ZONE C2-1 FIRE DIST. TWO LOT TYPED COT. LOT SIZE

2. PURPOSE OF BUILDING (16) Shop building AND Argonaut

3. JOB ADDRESS 165 Culver Blvd. AND Charles Entrekin

4. BETWEEN CROSS STREETS Culver Blvd. AND Charles Entrekin

5. OWNER'S NAME Charles Entrekin CITY ZIP 6834 Esplanade, PDR

6. OWNER'S ADDRESS 6834 Esplanade, PDR BUS. LIC. NO. S 1215 ACTIVE STATE LIC. NO. 389 2778 PHONE

7. ENGINEER JACKSON LEWIS BUS. LIC. NO. S 1215 ACTIVE STATE LIC. NO. 389 2778 PHONE

8. ARCHITECT OR DESIGNER NONE

9. CONTRACTOR NONE BUS. LIC. NO. ACTIVE STATE LIC. NO. PHONE

10. BRANCH LEADER UNKUNOWN ADDRESS CITY

11. SIZE OF NEW BLDG. STORIES HEIGHT NO. OF EXISTING BUILDINGS ON LOT AND USE WIDTH 42' LENGTH 45' EX. WALLS 2 22' ROOF none FLOOR WOOD

12. MATERIAL OF CONSTRUCTION BRICK

13. JOB ADDRESS 165 Culver Blvd. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING \$ 55,000

PURPOSE OF BUILDING Retail Stores

TYPE	GROUP OCC.	BLDG. AREA	TOTAL	STORIES	HEIGHT
1	1	600	600	2	22

PLAN CHECK EXPIRES ONE YEAR AFTER FEE IS PAID. PERMIT EXPIRES TWO YEARS AFTER FEE IS PAID OR 180 DAYS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.

P.C. No. H16002

SEP-20-77 06103 W • M - 6 CK 238.42  
 JAN-25-78 14812 W 16833 • K - 1 CK 280.50

**STATEMENT OF RESPONSIBILITY**

I certify that in doing the work specified herein I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed. (See Sec. 91.0202 L.A.M.C.)

Signed: *Charles W. Entrekin*  
 (Contractor/Agent having Property Owner's Consent)

Bureau of Engineering

ADDRESS APPROVED  
 DRIVEWAY 26.26' per 5/14/78 S 4423 Reels 1-24-78  
 HIGHWAY DEDICATION REQUIRED  
 No Right-of-Way, No Right-of-Way, No Right-of-Way  
 FLOOD CLEARANCE COMPLETED OK Jan Behan, 1/6/78

SEWERS	X	SEWERS AVAILABLE	CP 9/20/77
		NOT AVAILABLE	
NO SEWER/PLUMBING REQ'D.	X	SFC PAID 267.65	1-24-78
SFC NOT APPLICABLE	X	SEC. DUE \$267.65	9/20/77
APPROVED FOR ISSUE		NO FILE	
APPROVED (TITLE 19) (L.A.M.C.-5700)			
HOUSING AUTHORITY APPROVAL			
APPROVED UNDER CASE #			
APPROVED FOR RECEIPT NO.			

Signature/Date: CP 9/20/77

**WORKMEN'S COMPENSATION CERTIFICATION**

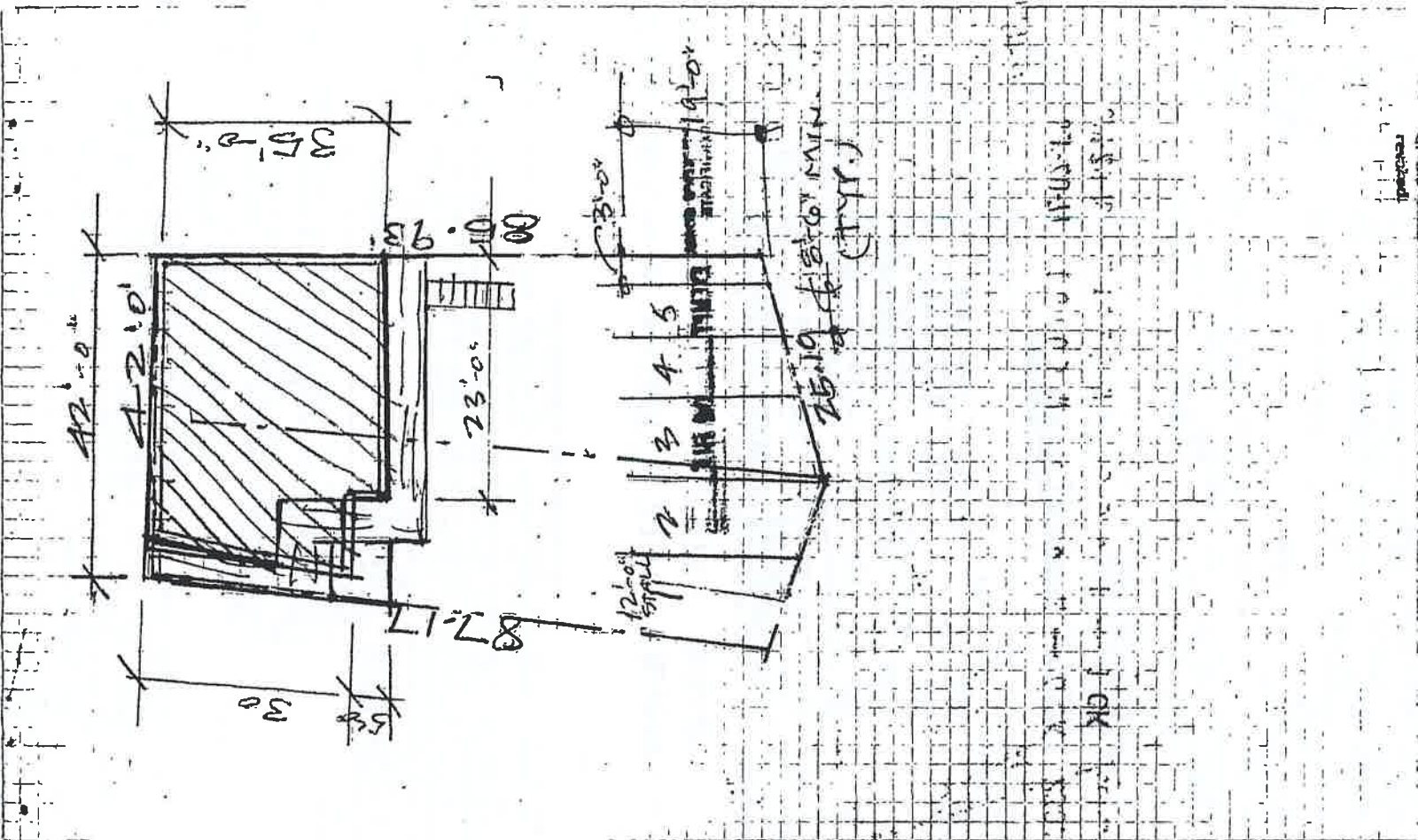
I certify that in the performance of the work for which this permit is issued I shall not employ any person in any manner so as to become subject to the workmen's compensation laws of California.

*William F. Kelly*  
SIGNATURE OF PERMITTEE

*Owner*  
POSITION

*1-10-79*  
DATE

If, after signing this certificate, the applicant desires to employ any person for work covered by this permit, the applicant shall first comply with the provisions of Section 3700 of the State Labor Code by the permit shall be deemed *renewed*.





INSTRUCTIONS: Applicant to Complete Numbered Items Only.

1. LEGAL LOT 13 TRACT 5 PLAYA DEL REY TOWN  
DESCR OF BUILDING NEW USE OF BUILDING  
2. ( ) Beer Bar & Food ( ) Same  
3. JOB ADDRESS 179 Culver Blvd.  
4. BETWEEN CROSS STREETS Culver Pl. AND Esplanade  
5. OWNER'S NAME Peter Phillips & Albert Sipper EX 11812  
6. OWNER'S ADDRESS 2021 Glencoe Ave. Venice CITY 90291 ZIP  
7. OWNER OR DESIGNER Irreg. STATE LICENSE No. PHONE

8. ENGINEER Kirk B. Florance ACE 6424 STATE LICENSE No. PHONE 395-7641  
9. CONTRACTOR Jensen Htg. & A/C Co. 211568 STATE LICENSE No. PHONE 393-9243  
10. OWNER NAME ADDRESS BRANCH AFFIDAVITS

11. SIZE OF EXISTING BLDG. LENGTH 70' WIDTH 25' STORIES 31! HEIGHT 31! NO. OF EXISTING BUILDINGS ON LOT AND USE  
12. MATERIAL OF CONSTRUCTION Brick ROOF Wood FLOOR 1st-wood 2nd-wood

3 VALUATION INCLUDING FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING \$ 1,200  
15. NEW WORK: (Describe) Install cooking vent & roof access

TYPE	GROUP	SPRINKLERS REQUIRED SPECIFIED	COMB GEN MAJ. S.	INSPECTION ACTIVITY	HEIGHT
BLDG. AREA	MAX. OCC.	TOTAL	PLANS CHECKED	CONS.	
DWELL. UNITS	GUEST ROOMS	BATHS REQ'D PROVIDED	PLANS PROVIDED	ZONED BY	
P.C. No.	CONT. INSP.		APPLICATION APPROVED	FILE WITH	
P.C. 1062	S.P.C.	G.P.I.	B.P. I.F. O.S.	C/O	TYPIST C.I.

PLAN CHECK EXPIRES SIX MONTHS AFTER FEE IS PAID. PERMIT EXPIRES ONE YEAR AFTER FEE IS PAID OR SIX MONTHS AFTER FEE IS PAID IF COMPLETED.  
SEP-28-73 06153 W 96868 • K = 6 CC 10.62  
SEP-28-73 06153 W 96868 • K = 1 CC 12.50

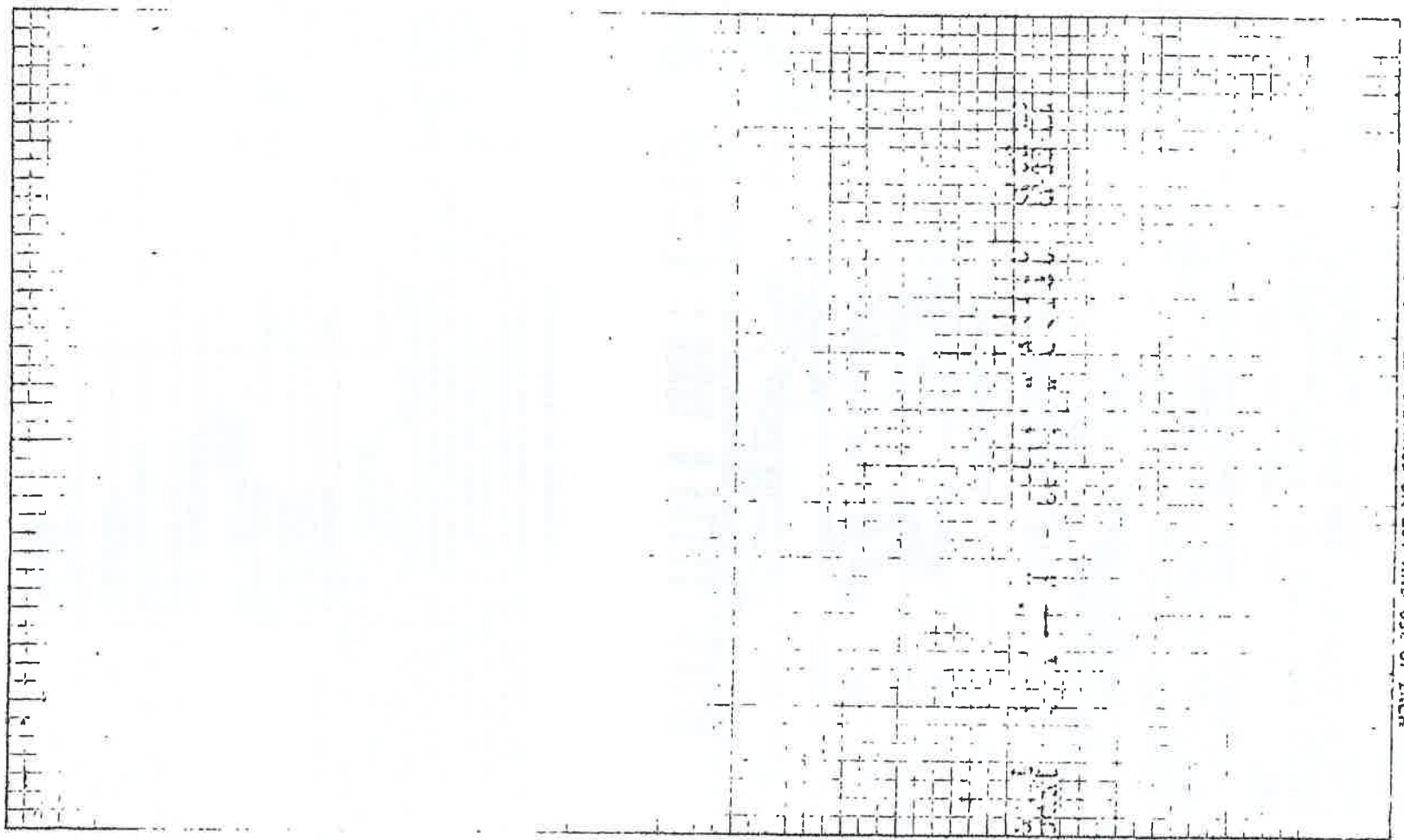
STATEMENT OF RESPONSIBILITY

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"This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed." (See Sec. 91.0202 L.A.M.C.)

Signed *Kirk B. Florance* (Owner or Agent)

Address Approved	Name	Date
Bureau of Engineering	EW	9/28/73
SEWERS AVAILABLE		
NOT AVAILABLE		
DRIVEWAY APPROVED	EW	9/28/73
HIGHWAY DEDICATION REQUIRED COMPLETED		
FLOOD CLEARANCE APPROVED		
APPROVED FOR ISSUE FILE #		
PRIVATE SEWAGE DISPOSAL SYSTEM APPROVED		
APPROVED UNDER CASE #		
APPROVED (TITLE 19) (L.A.M.C.-5700)		
APPROVED FOR		
Conservation		
Plumbing		
Planning		
Fire		
Traffic		



ON LOT PLAN SHOW ALL DIMENSIONS ON LOT AND USE OF EACH



INSTRUCTIONS: Applicant to Complete Numbered Items Only.

1. LOT: 13, 5, 8557  
 TRACT: 79194  
 DIST. MAP: CEBSUR PL  
 2. PRESENT USE OF BUILDING & RESTAURANT NEW USE OF BUILDING: same  
 ( ) Light hseking. (17)  
 3. JOB ADDRESS: 179 & 181 Culver Blvd.  
 4. BETWEEN CROSS STREETS AND Esplanade  
 Vista del Mar  
 5. OWNER'S NAME: Sipper - Phillips PHONE: 821-3063  
 6. OWNER'S ADDRESS: 423 Culver Blvd. CITY: PDR  
 STATE LICENSE No. PHONE  
 7. ENGINEER: Duaine K. Bricker STATE LICENSE No. PHONE: 821-1327  
 CONTRACTOR: Construction Bldrs. STATE LICENSE No. PHONE: 821-3063  
 BRANCH ADDRESS: 123529 821-3063  
 10. LENDER: 179 & 181 Culver Blvd.

11. SIZE OF EXISTING BLDG. 18 STORIES HEIGHT NO. OF EXISTING BUILDINGS ON LOT AND USE  
 WIDTH 25 LENGTH 2 30  
 12. CONST. MATERIAL OF EXISTING BLDG. brick ROOF compo  
 13. JOB ADDRESS: 179 & 181 Culver Blvd.  
 14. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING \$ 10,000.

15. NEW WORK: (Describe) Fire repair walls - plaster painting & remodeling of all units.

TYPE	GROUP OCC.	MAX OCC.	GUEST ROOMS	CONT. INSP.	S.P.C.	B.P.	TR.	G.P.I.	U.S.	C/O	P.M.	TYPIST
BLDG. AREA	179 & 181 Culver Blvd.	6-2-143										
DWELL. UNITS												
SPRINKLERS REQ'D												
SPECIFIED												

P.C. No. JUL-17-70 01048 W 00361 • L - 6 CK 48.02  
 JUL-17-70 01049 W 00361 • L - 1 CK 56.58

CASHERS' USE ONLY

STATEMENT OF RESPONSIBILITY

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

"This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed." (See Sec. 91.0202 L.A.M.C.)

Signed Duaine K. Bricker (Owner or Agent)

Bureau of Engineering	Signature/Date	EW JUL 1 1970
SEWERS	SEWERS AVAILABLE	
	NOT AVAILABLE	
	SFC PAID	NO SEWER/PLUMBING REQ'D.
	SFC DUE	SFC NOT APPLICABLE
DRIVEWAY		
HIGHWAY DEDICATION	REQUIRED	
	COMPLETED	
FLOOD CLEARANCE		
APPROVED FOR ISSUE	<input type="checkbox"/>	NO FILE <input type="checkbox"/>
APPROVED (TITLE 19) (L.A.M.C.-5700)		
PRIVATE SEWAGE SYSTEM APPROVED		
APPROVED UNDER CASE #		
APPROVED FOR		





**3 No 209 APPLICATION TO ALTER - REPAIR - DEMOLISH AND FOR CERTIFICATE OF OCCUPANCY**

BAS Form B-3

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only  
2. Plot Plan Required on Back of Original.

PERMITS TRACT 12224-2

1. LEGAL DESCR. **Lot 8 43,44,45 (16) Stores** TRACT **17** DIST. MAP **7194**  
 2. PRESENT USE OF BUILDING **(16) Stores** NEW USE OF BUILDING **(16) Stores-Offices** ZONE **C-2-1**  
 3. JOB ADDRESS **200 Culver Boulevard** FIRE DIST. **11**

4. BETWEEN CROSS STREETS **1st & 2nd** AND **Pershing St.** INSIDE KEY **IRREG**  
 5. OWNER'S NAME **Mrs. Dolson** P.O. BOX **391-9625** COR. LOT REV. COR.  
 6. OWNER'S ADDRESS **200 Culver Blvd.** STATE LICENSE NO. **MA 3-6121** PHONE **IRREG**  
 7. ARCHITECT/DESIGNER **Jack Donner** STATE LICENSE NO. PHONE  
 8. ENGINEER **None** STATE LICENSE NO. PHONE

9. CONTRACTOR **Owner** STATE LICENSE NO. PHONE  
 10. SIZE OF EXISTING BLDG. STORIES **2** HEIGHT **33'** NO. OF EXISTING BUILDINGS ON LOT AND USE **4' 33E @ REAR**  
 11. MATERIAL OF CONSTRUCTION **Stud & Sngl Wood & Sngl Wood** FLOOR **Wood**

12. JOB ADDRESS **200 Culver Boulevard** VALUATION APPROVED **33**  
 13. VALUATION. TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING \$ **50,000.00** PLANS CHECKED **OK**  
 14. NEW WORK **Seal up lly. Qtrs. on Mezz. Upgrade Elec., Plumb, Htg. & Safety as per Conservation** PLANS APPROVED **OK**  
 TYPE **V** GROUP **G1/G2** SPRINKLERS **None** HEIGHT **33** HEIGHT **25056** STORIES **2** STORIES **2** STORIES **2**  
 BLDG. AREA **N.C.** MAX. OCC **None** TOTAL **None** VALUATION APPROVED **OK**  
 CELL UNITS **NONE** GUEST ROOMS **2** SPACES **2** BEQID PROVIDED **2** PLANS APPROVED **OK** FILE WITH **Paym.**  
 P.C. No. **NONE** CONT. INSP. **2** APPLICATION APPROVED **OK** INSPECTOR **None**

P.C. **27.30** S.F.C. **42.00** G.P.I. **42.00** I.F. **0.5** O.S. **0/0** TYPYST  
**SEP 22 1955** 59978 **SEP 22 65** 24934 **B - 3 CK** 27.30  
**SEP 22 65** 26698 **B - 1 CK** 42.00

**STATEMENT OF RESPONSIBILITY**

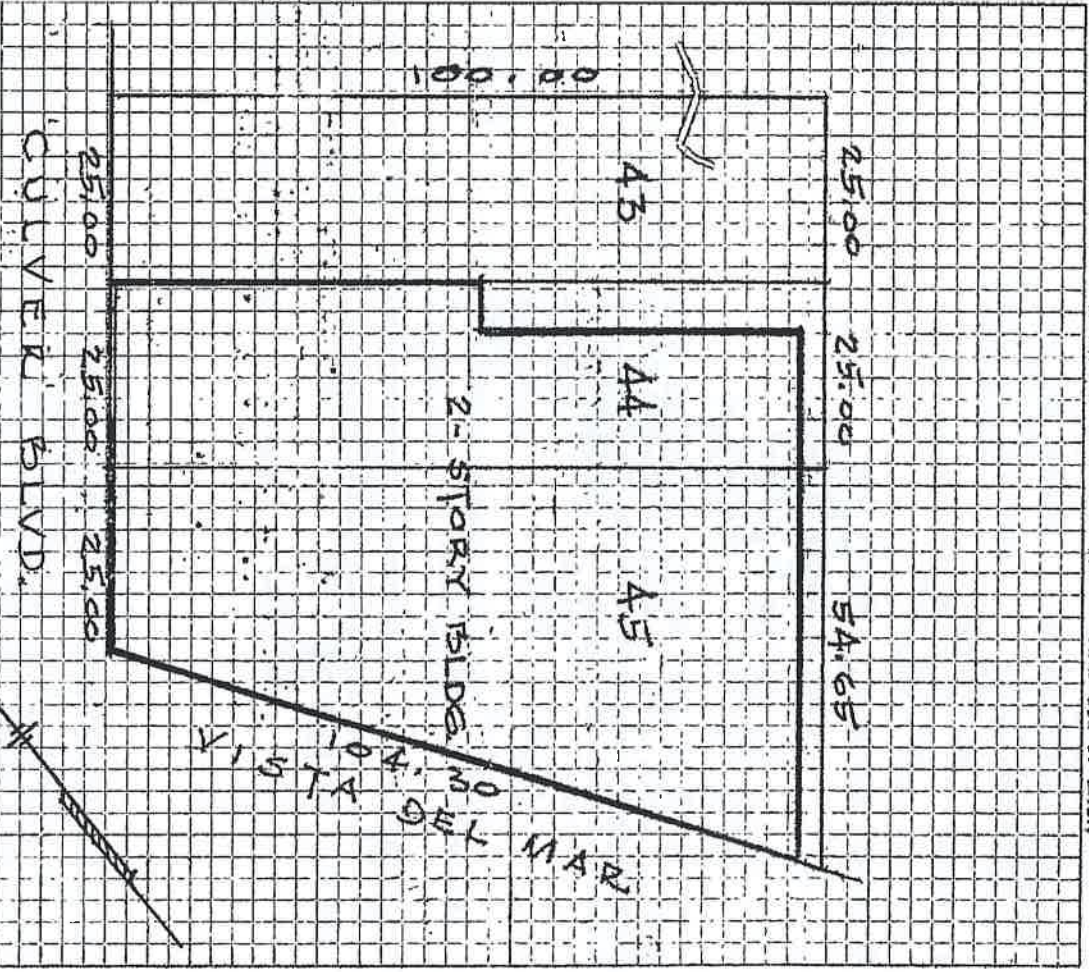
I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.  
 This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed. (See Sec. 91,0202 L.A.M.C.)

Signed <b>Jack Donner</b> (Owner or Agent)	Name <b>Jack Donner</b>	Date <b>9/22/55</b>
Bureau of Engineering	ADDRESS APPROVED <b>OK</b>	
	SEWERS AVAILABLE <b>None</b>	
	NOT AVAILABLE <b>None</b>	
	DRIVEWAY APPROVED <b>None</b>	
	HIGHWAY DEDICATION REQUIRED <b>None</b>	
	COMPLETED <b>None</b>	
	FLOOD CLEARANCE APPROVED <b>None</b>	
	APPROVED FOR ISSUE FILE # <b>None</b>	
Conservation	PRIVATE SEWAGE DISPOSAL SYSTEM APPROVED <b>None</b>	
Plumbing	APPROVED UNDER CASE # <b>None</b>	
Planning	APPROVED (TITLE 19) (L.A.M.C.-5700) <b>None</b>	
Fire	APPROVED FOR <b>None</b>	
Traffic		



No Hwy Red. reqd. - interior ht.  
only per  
Cons File X 2525

ON PLOT PLAN SHOW ALL BUILDINGS ON LOT AND USE OF EACH



PLOT PLAN  
SC 1/2" = 12.50'





1. LEGAL DESCR. E PLAYA DEL REY TOWNSITE

2. PRESENT USE OF BUILDING ( ) Snopping center

3. JOB ADDRESS 225 Culver Blvd.

4. BETWEEN CROSS STREETS AND Esplanade Pershing

5. OWNER'S NAME Mr. Luc Matilla

6. OWNER'S ADDRESS SAME

7. ENGINEER

8. ARCHITECT OR DESIGNER Yico Cetta, Architect

9. CONTRACTOR to be selected

10. BRANCH LENDER

11. SIZE OF EXISTING BLDG. WIDTH 11' x LENGTH 20'

12. CONST. MATERIAL OF EXISTING BLDG. wd frame

13. JOB ADDRESS 225 Culver Blvd. \$15,000.

14. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING BEYOND EXISTING

15. NEW WORK: (Describe) Add sloped roof over existing flat roof & add some storefront.

NEW USE OF BUILDING: Add sloped roof over existing flat roof & add some storefront.

TYPE: I/A/C

BLDG. AREA: 11500

DWELL UNITS: NC

SPRINKLERS REQ'D: 34 + 3

P.C. 69.27

PLAN CHECK EXPIRES SIX MONTHS AFTER FEE IS PAID. PERMIT EXPIRES ONE YEAR AFTER FEE IS PAID OR SIX MONTHS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.

FRAC: Playa del Rey Townsite

CENSUS TR. 2781.00

ZONE C-2-1

FIRE DIST. II

LOT (TYPED) City blk

GITY LOT SIZE irreg.

AFFIDAVIT: CZCA ZA 7714 20453

AHA

DIST. OFFICE

WIA VERT. SOIL

GRADING HIGHWAY DED. YES

FLOOD

CONS.

ZONED BY ENDOBY FILE WITH

INSPECTOR

COMB MAJ. S. CONS

U.S. G.P.I.

S.P.C. = 21.50

I.F.

06324 W 01456 • K - 1 CK 86.50

05349 W • K - 6 CK 69.27

CASHIER'S USE ONLY

**STATEMENT OF RESPONSIBILITY**

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

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Signed: *Luc Matilla* (Owner or Agent)

Bureau of Engineering

ADDRESS APPROVED

SEWERS:  SEWERS AVAILABLE,  NOT AVAILABLE,  SFC PAID,  SFC DUE

DRIVEWAY:  NO SEWER/PLUMBING REQ'D.,  SFC NOT APPLICABLE

HIGHWAY DEDICATION:  REQUIRED,  COMPLETED

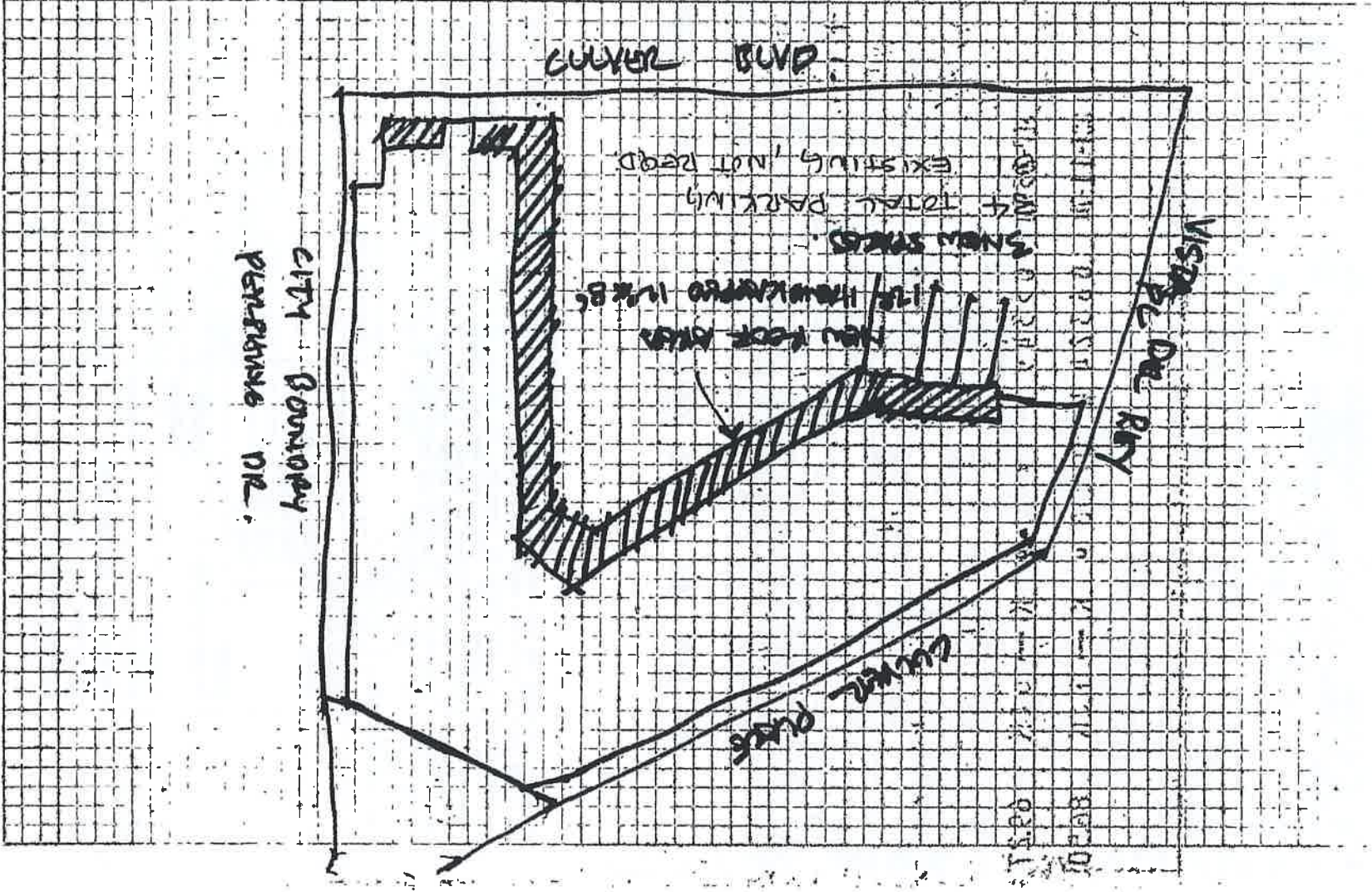
FLOOD CLEARANCE:  APPROVED FOR ISSUE,  NO FILE

Conservation:  APPROVED (TITLE 19) (L.A.M.C.-5700)

Fire:  PRIVATE SEWAGE SYSTEM APPROVED,  APPROVED UNDER CASE #,  APPROVED FOR

Signature/Date: *CP SEP 9 1974*, *Case 10-11-74*, *Existing Case 10-11-74*, *Case 10-11-74*, *H.F. Teardall 10/2/74*





ON LOT PLAN SHOW ALL BUILDINGS ON LOT AND USE OF EACH



# 1

## APPLICATION TO ERECT A NEW BUILDING AND FOR A Certificate of Occupancy

Form B-1  
CITY OF LOS ANGELES  
DEPARTMENT  
OF  
BUILDING AND SAFETY  
BUILDING DIVISION

Lot No. # 37 Block # 16

Tract # 8557

Location of Building. Photo Ret. Rex 316 Colton Blvd  
(House Number and Street)

Approved by  
City Engineer  
Deputy

Between what cross streets? Culver Blvd. & Pershing

USE INK OR INDELIBLE PENCIL

- Purpose of building Store - Retail No Food Families..... Rooms.....
- Owner Richard O. Heister Phone Frontier 22360
- Owner's Address 235-24 14<sup>th</sup> ST P. O. Manhattan Beach 34

- Certificated Architect..... State License No..... Phone.....
- Licensed Engineer..... State License No..... Phone.....
- Contractor..... OWNER State License No..... Phone.....
- Contractor's Address..... State License No..... Phone.....

8. VALUATION OF PROPOSED WORK {including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment therein or thereon} \$ 6500

9. State how many buildings NOW on lot and give use of each. None

10. Size of new building. 25 x 50 No. Stories 1 Height to highest point. 14 Size lot. 25.5 x 71

11. Material Exterior Walls. Plaster & Lath Type of Roofing Fire Retardant

- (a) Footing: Width 24 Depth in Ground 18" Width of Wall 8"
- (b) Size of Studs 2x4 Material of Floor Cement
- (c) Size of Floor Joists 5x8 Size of Rafters 2" x 10"

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

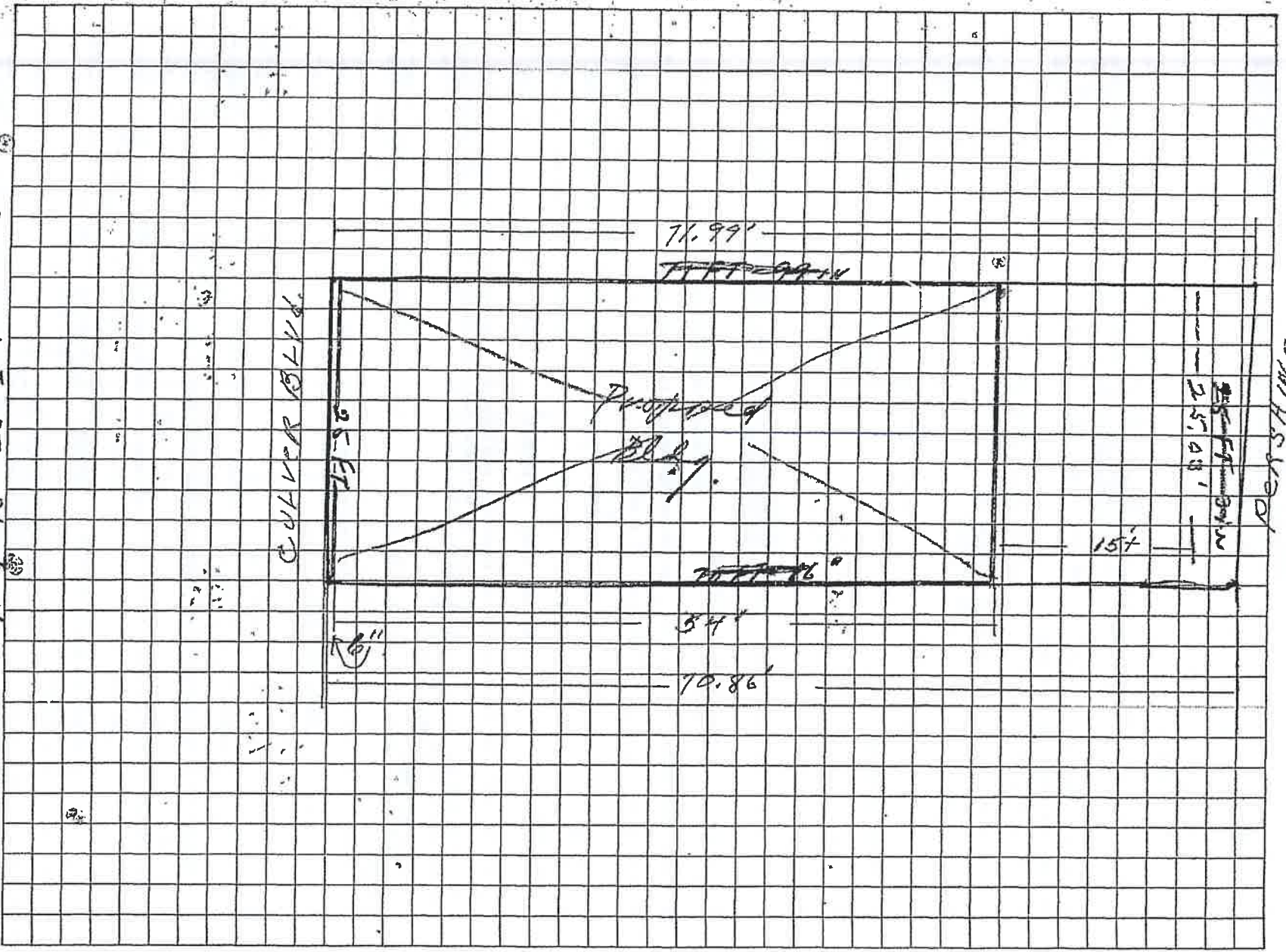
**VENICE DISTRICT**  
DISTRICT OFFICE SEWER AVAILABLE Sign here Richard O. Heister (Owner or Authorized Agent)  
By \_\_\_\_\_

PLAN CHECKING		FOR DEPARTMENT USE ONLY			
Valuation \$ <u>6500</u>	Inside Lot Occupant <u>THRU</u>	Key Lot Corner Lot Keyed Zone <u>C-2</u>	Lot Size <u>71.88</u>	Investigation Fee \$	Clerk
Fee \$ <u>15.00</u>	Plans and Specifications checked <u>Yes</u>	Bldg. Line <u>---</u>	Fire District No. <u>2</u>	Bldg. Permit Fee \$ <u>22.50</u>	
GROUP <u>G-1</u>	Plans, Specifications and Application reviewed and approved. <u>Yes</u>	Continuous Inspection <u>---</u>	Street Widening <u>---</u>	District Map No. <u>---</u>	Inspector
For Plans See <u>Spec</u>	Correction Verified <u>Spec</u>	SPRINKLER Specified—Required <u>---</u>	Application checked and approved <u>---</u>	Application checked and approved <u>---</u>	
Filed With <u>(S)</u>		Valuation Included <u>---</u>			Clerk

DO NOT WRITE BELOW THIS LINE

TYPE OF RECEIPT	DATE ISSUED	TRACER NO.	(M) RECEIPT NO.	CODE	FEE PAID
Plan Checking	<u>NOV 9 1954</u>				
Supplemental Plan Checking					
Building Permit	<u>NOV 20</u>				

dot-57  
Playa Del Rey  
Block 16





3

PUBLIC RECORD APPLICATION FOR INSPECTION - TO ADD-ALTER-REPAIR-DEMOLISH AND FOR CERTIFICATE OF OCCUPANCY DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 1. LOT 35-36 BLOCK 16 TRACT Playa Del Rey DIST. MAP 7104 COUNCIL DISTRICT NO. 2781.00

2. PRESENT USE OF BUILDING Retail stores & Apt's. same 3. JOB ADDRESS 318-22 1/2 Culver

4. BETWEEN CROSS STREETS 318-22 1/2 Culver 5. OWNER'S NAME Elmore 6. OWNER'S ADDRESS 225-30th St. Manhattan Beach 90266

7. ENGINEER 8. ARCHITECT OR DESIGNER 9. ARCHITECT OR ENGINEER'S ADDRESS 10. CONTRACTOR: Orliey 11. SIZE OF EXISTING BLDG. 218 STORIES HEIGHT 1-APT & REPAIR STORE NO. OF EXISTING BLDG. 30

12. CONST. MATERIAL: Stocco 13. JOB ADDRESS: 318-22 1/2 Culver 14. VALUATION TO INCLUDE ALL EXPD EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING \$ 1000

15. NEW WORK (Describe) Construction of roofs over balconies 16. I hereby affirm that I am licensed under the provisions of Chapter 9 (commencing with Section 70600) of Division 3 of the Business and Professions Code, and my license is in full force and effect.

DECLARATIONS AND CERTIFICATION LICENSED CONTRACTORS DECLARATION I hereby affirm that I am exempt from the Contractor's License Law for the following reason (Sec. 70615, Business and Professions Code)...

OWNER-BUILDER DECLARATION I hereby affirm that I am exempt from the Contractor's License Law for the following reason (Sec. 70615, Business and Professions Code)...

WORKERS' COMPENSATION DECLARATION I hereby affirm that I have a contract with the Los Angeles City Dept. of Bldg. & Safety...

CERTIFICATE OF EXEMPTION FROM WORKERS' COMPENSATION INSURANCE I certify that the performance of the work for which this permit is issued, shall not employ any person in any manner...

CONSTRUCTION LENDING AGENCY I hereby affirm that there is a construction lending agency for the performance of the work for which this permit is issued (Sec. 3097, Ch. C).

Lender's Name: Tower & Spatt having property owner's consent. Signed: [Signature] Date: 9/19/80



Office of  
Management

Approved by: Christian 1-29-79  
Date: \_\_\_\_\_

NOT AVAILABLE

PAID

DATE

AMOUNT

REMARKS

APPROVED BY: \_\_\_\_\_  
HOUSING AUTHORITY APPROVAL

APPROVED OTHER OFFICER

Contract or application letter  
dated 9-22-82

2 STORY BLDG. 1ST FLOOR.

TYPE D BLDG. IN 197002

A UNIT

PROPERTY

TAKEN OVER

2-9-81

0-2-82

CURBS REPAIRS

ALSO

12/81

1-25-82





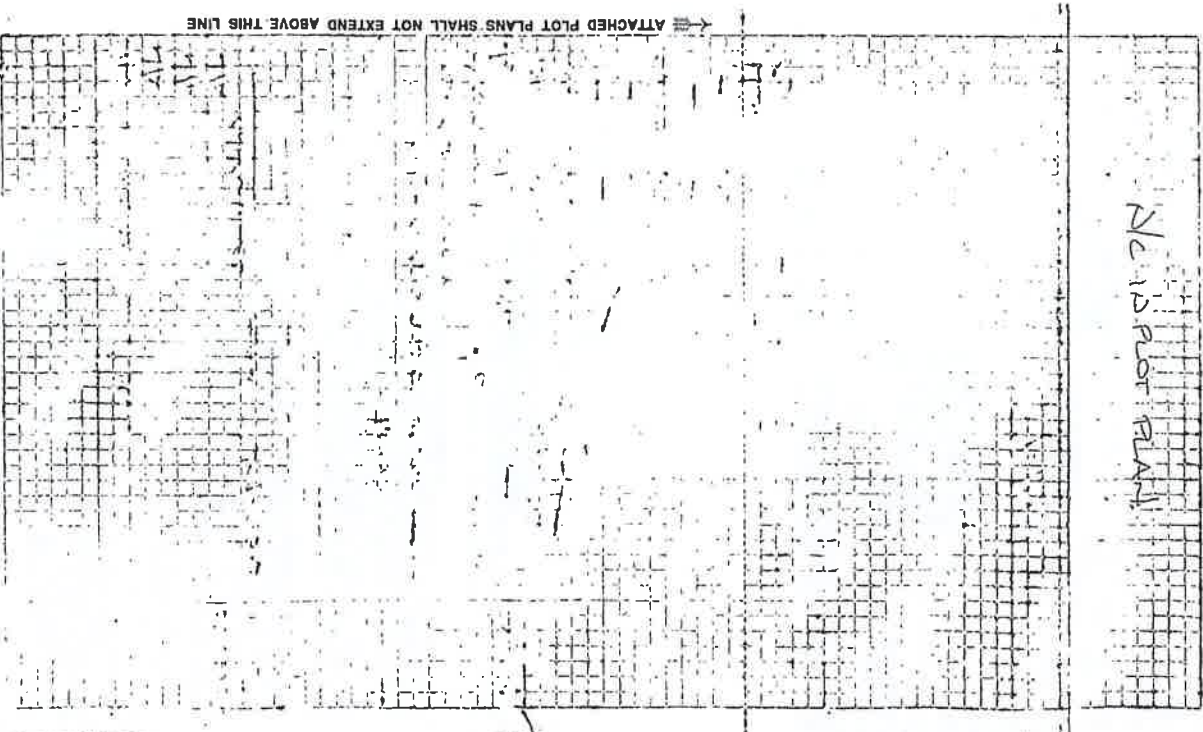
264001G0016

Bureau of Engineering	Address APPROVED 11/16/89	
	DRIVEWAY	
	HIGHWAY	REQUIRED
	DEDICATION	COMPLETED
	FLOOD CLEARANCE	
SEWERS		SEWERS AVAILABLE
REL. NO.		NOT AVAILABLE
CERT. NO.	SFC PAID	
	SFC DUE	
	SFC NOT APPLICABLE	
Grading	PRIVATE SEWAGE SYSTEM APPROVED	
Comm. Safety	APPROVED FOR ISSUE <input type="checkbox"/> NO FILE <input type="checkbox"/> FILE CLOSED <input type="checkbox"/>	
Fire	APPROVED (TITLE 10 (L.A.M.C. 2709))	
Housing	HOUSING AUTHORITY APPROVAL	
Planning	APPROVED UNDER CASE #	
Transportation	APPROVED FOR	
Construction Tax	RECEIPT NO.	DWELLING UNITS

LEGAL DESCRIPTION

ON PLOT PLAN SHOW ALL BUILDINGS ON LOT AND USE OF EACH

*Ac 10 Plot Plan*



ATTACHED PLOT PLANS SHALL NOT EXTEND ABOVE THIS LINE

CITY OF LOS ANGELES DEPT. OF BUILDINGS  
 AND FOR CERTIFICATE OF OCCUPANCY DEPT. OF BUILDINGS AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LEGAL DESOR. 24 & 25 BLK. 16 TRACT 8557 DIST. MAP 2781  
 2. PURPOSE OF BUILDING 5-Unit apartment building #4TT PARKING 7194  
 3. JOB ADDRESS 342 Culver ZONE C-2-1  
 4. BETWEEN CROSS STREETS Pershing AND Earldom Ave. FIRE DIST. II  
 5. OWNER'S NAME Sam S. Miyashiro CITY 478-8271 ZIP 90025  
 6. OWNER'S ADDRESS 11941 Wilshire L.A. STATE LICENSE NO. 90025  
 7. ARCHTGT OR DESIGNER Del Dideriksen RBD 869 478-4793  
 8. ENGINEER J.J. Takahashi CE 6074-661-1553 STATE LICENSE NO. 661-1553  
 9. CONTRACTOR Owner STATE LICENSE NO. PHONE

10. LENDER OWNER BRANCH ADDRESS AFFIDAVITS  
 11. SIZE OF NEW BLDG. 40' x 82'6" NO. OF EXISTING BUILDINGS ON LOT AND USE AHA  
 LENGTH 40' WIDTH 82'6" None  
 12. MATERIAL OF CONSTRUCTION Styrofoam Roof Compo Floor Lt. Wt. Cong. DISTRICT OFFICE VIA GRADING YES CRIT. SOIL / HIGHWAY DED. YES FLOOD / CONS. / ZONED BY RABODY FILE WITH

13. JOB ADDRESS 342 Culver VALUATION TO INCLUDE ALL FIXED EQUIPMENT TO BE RATED AND USE PROPOSED BUILDING \$ 90,000 / 70,000

PURPOSE OF BUILDING 5-Unit Apt/Spec Attached Parking

GROUP	STORIES PLANS CHECKED	STORIES TOTAL
BLDG AREA 3040 sq ft	2/2/5-1	2/2/5-1
DWELL. UNITS 1	1	1
SPRINKLERS 0	0	0
REQ'D GUEST ROOMS 0	0	0
PARKING SPACES 7	7	7
REQ'D PROVIDED	7	7
CONT. INSPY	7	7

P.C. No. 6991 P.P. No. 89492 S.P. No. 89492 I.F. 015. C/O TYPIST

PLAN CHECK EXPIRES SIX MONTHS AFTER FEE IS PAID. PERMIT EXPIRES ONE YEAR AFTER FEE IS PAID OR SIX MONTHS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.

DATE	W	CK	AMOUNT
SEP-1-72	17432	W	6 CK 184.92
NOV-2-72	21599	W	6 CK 35.10
NOV-2-72	21600	W	9 CK 25.00
NOV-2-72	21601	W	1 CK 394.50

STATEMENT OF RESPONSIBILITY

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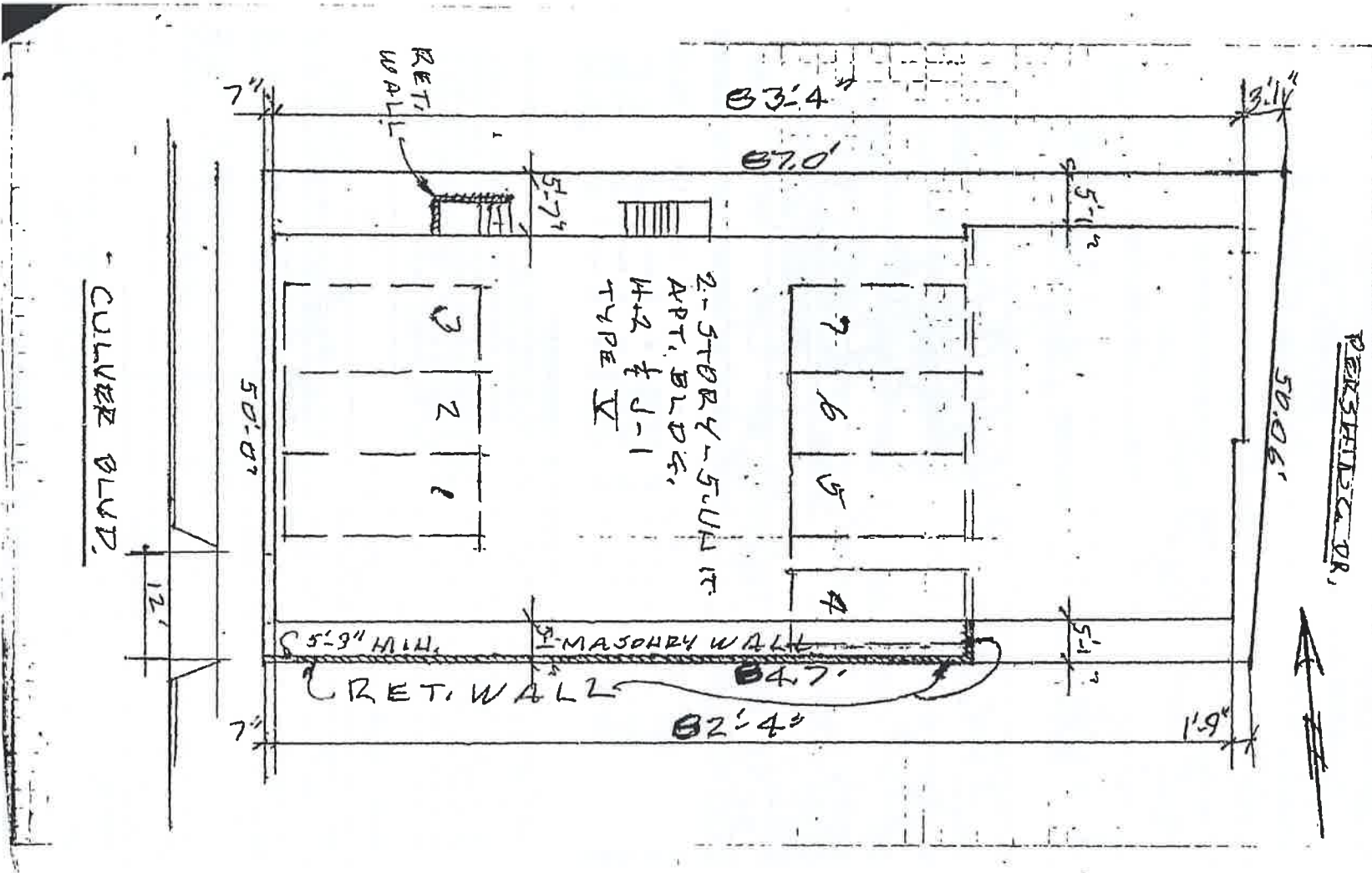
Signed Sam S. Miyashiro (Owner or Agent) Name Date

ADDRESS APPROVED	RT	8/31/72
SEVERS AVAILABLE	RT	8/31/72
1/2T AVAILABLE	RT	8/31/72
DRIVEWAY APPROVED	RT	8/31/72
HIGHWAY DEDICATION REQUIRED	RT	8/31/72
COMPLETED	RT	8/31/72
FLOOD CLEARANCE APPROVED	RT	8/31/72
APPROVED FOR ISSUE	RT	8/31/72
FILE #	RT	8/31/72
PRIVATE SEWAGE DISPOSAL SYSTEM APPROVED	RT	8/31/72
APPROVED LATER CASE #	RT	8/31/72
APPROVED (TITLE 19) (L.A.M.C. 5700)	RT	8/31/72
APPROVED FOR	RT	8/31/72

Bureau of Engineering  
 11/2/72  
 J. Miyashiro  
 11/2/72

- Conservation
- Plumbing
- Planning
- Fire
- Traffic





PERSPECTIVE DR.



33'-4"

37'-0"

3'-1 1/2"

50'-0"

7"

50'-0"

7"

5'-7"

5'-1 1/2"

5'-1 1/2"

1'-9"

5'-9" HIGH

MASONRY WALL

34'-7"

RET. WALL

32'-4"

2-STORY - 5 UNIT  
APT. BLDG.  
W/2 & J-1  
TYPE V

3  
2  
1

6  
5  
4

CULVERT BLDG.

12'

**1** APPLICATION FOR INSPECTION OF NEW BUILDING **A-4**  
 CITY OF LOS ANGELES AND FOR CERTIFICATE OF OCCUPANCY  
 DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LEGAL DESCR.	LOT	B'LK.	TRACT	CENSUS TRACT
20 & 21	16	8557		2781
2. PURPOSE OF BUILDING				
OS 5 Unit Apt				
3. JOB ADDRESS				
400 Culver Blvd				
4. BETWEEN CROSS STREETS				
BARTOIN				
5. OWNER'S NAME				
D.J.Sullivan				
6. OWNER'S ADDRESS				
7345 W. 92nd St.				
7. ARCHITECT OR DESIGNER				
William Ehinger				
8. ENGINEER				
II				
9. CONTRACTOR				
Reliable Builders				
10. LENDER				
Reliable Builders				

11. SIZE OF NEW BLDG.	STORIES	HEIGHT	NO. OF EXISTING BUILDINGS ON LOT AND USE
86 x 40	2	27	none
12. MATERIAL OF CONSTRUCTION	EXT. WALLS	ROOF	FLOOR
	wd	wd	wd
13. JOB ADDRESS			
400 Culver Blvd.			
14. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING			
\$ 50,000 100,000			

PURPOSE OF BUILDING			
APT BLDGS			
TYPE	GROUP	STORIES	PLANS CHECKED
4	H-2/J-1	2	Kaemon
BLDG. AREA	MAX. OCC.	TOTAL	PLANS APPROVED.
3400			Kaemon
DWELL. UNITS	GUEST ROOMS	REQ'D PARKING SPACES	APPLICATION APPROVED
5	-	10 10	Kaemon
SPRINKLERS			
REQ'D SPECIFIED			
CONT. INSP.			

P.C. No.	G.P.	S.P.C.	B.P.	INSPECTION ACTIVITY	COMB	GEN	MAJ. S.	CONS	G/O	INSPECTOR																								
V 7008	12772	7150	800	30650						I																								
PLAN CHECK EXPIRES SIX MONTHS AFTER FEE IS PAID. PERMIT EXPIRES ONE YEAR AFTER FEE IS PAID. OR SIX MONTHS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.																																		
<table border="0"> <tr> <td>REC-16-71</td> <td>69700</td> <td>5</td> <td>41900</td> <td>6 CK</td> <td>127.72</td> </tr> <tr> <td>REC-16-71</td> <td>69700</td> <td>5</td> <td>41900</td> <td>7 CK</td> <td>71.50</td> </tr> <tr> <td>REC-16-71</td> <td>69700</td> <td>5</td> <td>41900</td> <td>1 CK</td> <td>8.00</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>306.50</td> </tr> </table>											REC-16-71	69700	5	41900	6 CK	127.72	REC-16-71	69700	5	41900	7 CK	71.50	REC-16-71	69700	5	41900	1 CK	8.00						306.50
REC-16-71	69700	5	41900	6 CK	127.72																													
REC-16-71	69700	5	41900	7 CK	71.50																													
REC-16-71	69700	5	41900	1 CK	8.00																													
					306.50																													
CASHIER'S USE ONLY																																		

**STATEMENT OF RESPONSIBILITY**

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

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Signed: <i>Donald J. Sullivan</i> (Owner or Agent)		Name	Date
Bureau of Engineering		H. Chute	9-15-71
<i>Initial Support furnished by 1:1 slope on site per plan sheet 9-7</i>		SFC of 102.50 due 8/4	9-15-71
Conservation		BCH	9-15-71
Plumbing		Not applicable	9-14-71
Planning			
Fire			
Traffic			

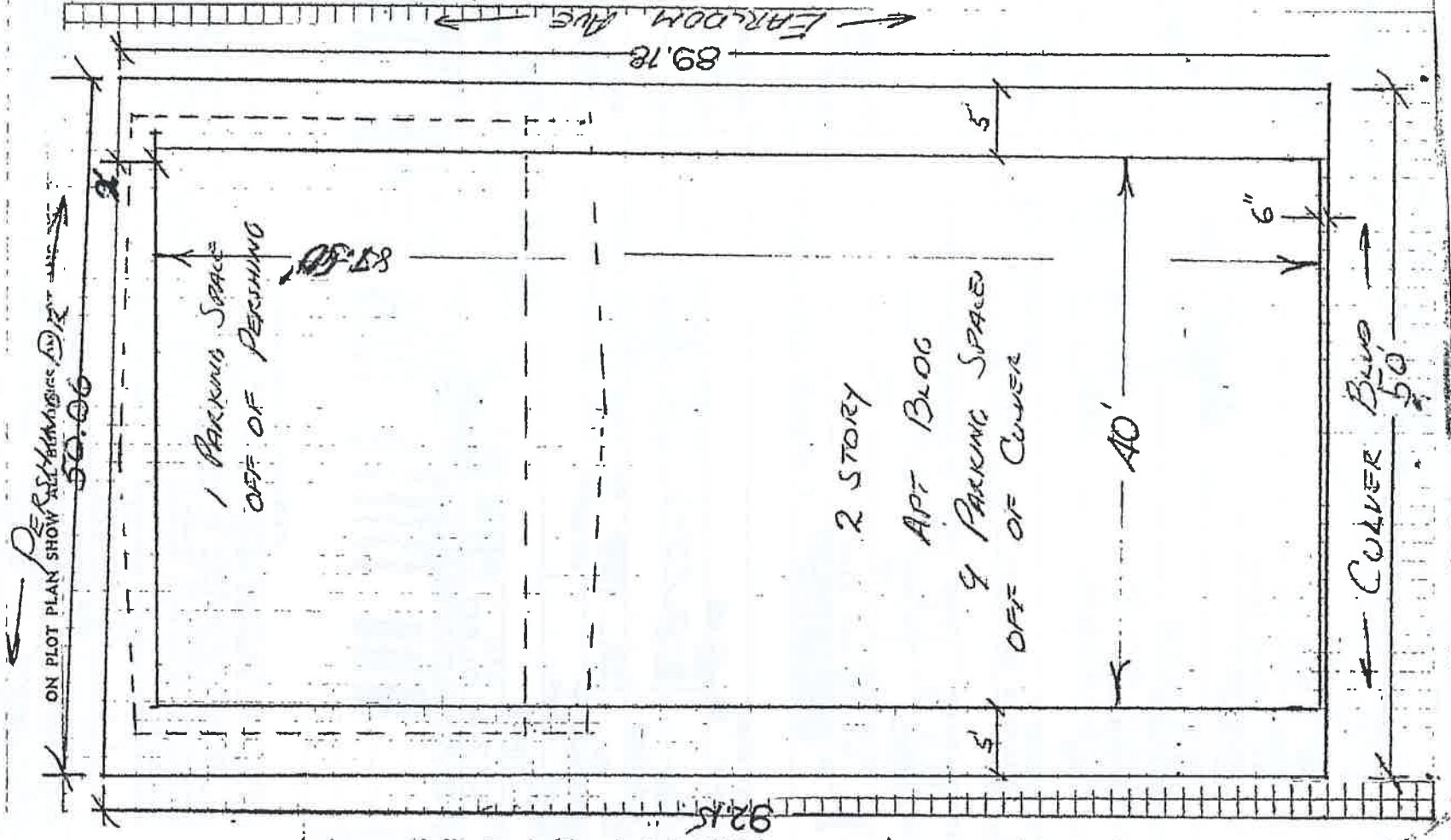
LEGAL DESCRIPTION

LOT 20 & 21

BLK 16

TR 8557

400 CULVER BLVD





**1** APPLICATION FOR INSPECTION OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY  
CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY

B45, B-1 - Rev. 3-64  
A-5

**INSTRUCTIONS:** 1. Applicant to Complete Numbered Items Only.  
2. Plot Plan Required on Back of Original.

1. LEGAL LOT 17-18-19 16 TRACT 1794  
DESCR. 8557

2. PURPOSE OF BUILDING (14 Unit & AH Garage)  
JOB ADDRESS 404 Culver Blvd.

3. JOB ADDRESS 404 Culver Blvd.

4. BETWEEN CROSS STREETS

5. OWNER'S NAME Nicholson AND Earldom  
PHONE

6. OWNER'S ADDRESS Carl E. Knutson GR 28515  
P. O. BOX ZONE Irreg.

7. 1768 Old Ranch Rd. IA 90049  
ARCHITECT OR DESIGNER RBD 231-GL 13008  
PHONE

8. C. Bloomfield STATE LICENSE NO. 6424 EX 57641  
K. Florence STATE LICENSE NO. PHASE

9. CONTRACTOR Hills/Persh-Affidavits Inc

10. SIZE OF NEW BLDG. STORIES 2 HEIGHT 25 NO. OF EXISTING BUILDINGS ON LOT AND USE none  
11. MATERIAL OF CONSTRUCTION EXT. WALLS stucco ROOF compo FLOOR wood  
12. JOB ADDRESS 404 Culver Blvd.

13. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING. \$100,000.00 162000

**1** PURPOSE OF BUILDING 14 Unit Apt. bldg & AH garage  
TYPE GROUP A-2/J-1

BLDG. AREA 5238 MAX. OCC. TOTAL 2  
DWELL. UNITS 14 GUEST ROOMS 0 SPACES PARKING 14 14 PROVIDED 14 14  
SPRINKLERS (REQ'D) Yes CONT. INSP. Ceilings & Groic beams  
P.C. FEB 13 60 71? AGW G.P.I. 5238 B.P. 32760 I.F. O.S. C/O AA3784  
P.C. 160 55 5238 32760 I.F. O.S. C/O

DISTRICT OFFICE WLA  
GRADING Yes  
CRIT. SOIL Yes  
HIGHWAY DED. Yes  
FLOOD  
CONS.  
ZONED BY Martz  
FILE WITH  
INSPECTOR

JAN - 8 - 68 00497 A -- 3 CK 160.55  
FEB-13-68 03245 C -- 3 CK 52.394  
FEB-13-68 03246 C -- 6 CK 5.00  
FEB-13-68 03247 C -- 1 CK 327.60

STATEMENT OF RESPONSIBILITY

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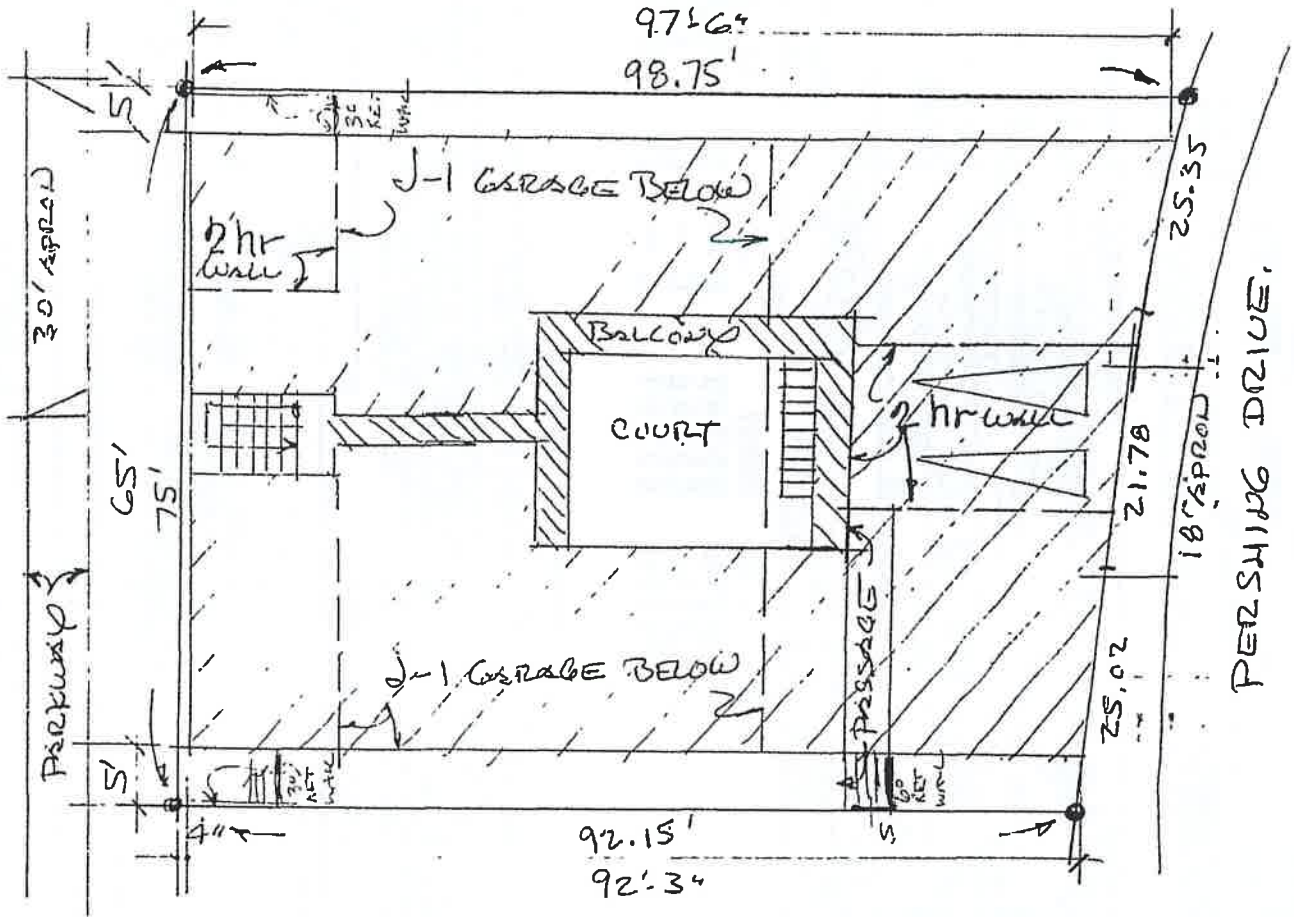
Signed *Carl E. Knutson* (Owner or Agent) Name MRP Date 1/68  
Bureau of Engineering ADDRESS APPROVED MRP 1/68  
SEWERS AVAILABLE MRP 1/68  
NOT AVAILABLE

DRIVEWAY APPROVED 30' mt. 20' crb. ht. MRP 1/68  
HIGHWAY DEDICATION REQUIRED  
COMPLETED None Required. L.L.H. 1/31/8  
FLOOD CLEARANCE APPROVED APPROVED FOR ISSUE 1/31-8  
FILE #

Conservation PRIVATE SEWAGE DISPOSAL SYSTEM APPROVED  
Plumbing APPROVED UNDER  
Planning CASE #  
Fire APPROVED (TITLE 19) (L.A.M.C.-5700)  
Traffic APPROVED FOR 2-7-68



CULVER BLVD.



PERSHING DRIVE.

**1** CITY OF LOS ANGELES. **APPLICATION FOR INSPECTION OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY** DEPT. OF BUILDING AND SAFETY

LA 10-68

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LEGAL DESCR. **LOT 17, 18, 19, 20, 21** BLK. **14** TRACT **Playa Del Rey Townsite 2781**  
 2. PURPOSE OF BUILDING **31 Unit Apartment**  
 3. JOB ADDRESS **405 Culver Blvd.**  
 4. BETWEEN CROSS STREETS **Earldom** AND **Nicholson St.**  
 5. OWNER'S NAME **Glipper Apt.** PHONE **478-1001**  
 6. OWNER'S ADDRESS **12041 Wilshire Blvd., L.A. 90055** CITY **L.A.** ZIP **90055**  
 7. ARCHITECT OR DESIGNER **Jack L. White** 537 STATE LICENSE NO. **347-3635** PHONE **347-3635**  
 8. ENGINEER **Kirk Florence** 6424 STATE LICENSE NO. **395-7641** PHONE **478-1001**  
 9. CONTRACTOR **Richards/Swartzwelder** 478-1001 STATE LICENSE NO. **478-1001** PHONE **478-1001**  
 10. LENDER BRANCH ADDRESS

11. SIZE OF NEW BLDG. **113' x 80'** STORIES **2** HEIGHT **38'** NO OF EXISTING BUILDINGS ON LOT AND USE **None**  
 12. MATERIAL OF CONSTRUCTION **Wd. frame** EXT WALLS **Blk** ROOF **wd. frame** FLOOR **conc.**  
**13.** JOB ADDRESS **405 Culver Blvd.** VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING **\$ 280,000**

PURPOSE OF BUILDING TYPE	GROUP	STORIES	PLANS CHECKED	INSPECTION APPROV'D		HIGHWAY DED.
				COMB	GEN	
Apartment House	A-2	2	Kerry Westlund			Yes
Blk. Area	8600 ft <sup>2</sup>		PLANS APPROV'D			FLOOD
Dwell. Units	31		APPLICANT APPROVED			CONS.
Sprinklers Req'd Specified	0		P. Richards			ZONED-4Y
P.C. No.	F-1 Garage		CONT. INSP. <b>Restressed Conc. &amp; Topping</b>			Pappas FILE WITH
			AA 4913			INSPECTOR <b>M</b>

P.C. **343-92** S.P.C. **70.64** G.P.A. **80398** B.P. **637.78** I.F. **10.5** C/O **CI** TYPYST **CI**

PLAN CHECK EXPIRES SIX MONTHS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED. PERMIT EXPIRES ONE YEAR AFTER FEE IS PAID OR SIX MONTHS AFTER FEE IS PAID.

JAN 22 70 80398 AUG 28 69 03507 A - 6 CK 343.  
 JAN 22 70 01207 A - 6 CK 70.64  
 JAN 22 70 01208 A - 1 CK 637.78

**STATEMENT OF RESPONSIBILITY**

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

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Signed **Jack L. White** Name **Jack L. White** Date **11-10-67**

Bureau of Engineering, Sewers Available **13** Not Available **11-28-69**

Highway Dedication Required **Completed**

Flood Clearance Approved **Completed**

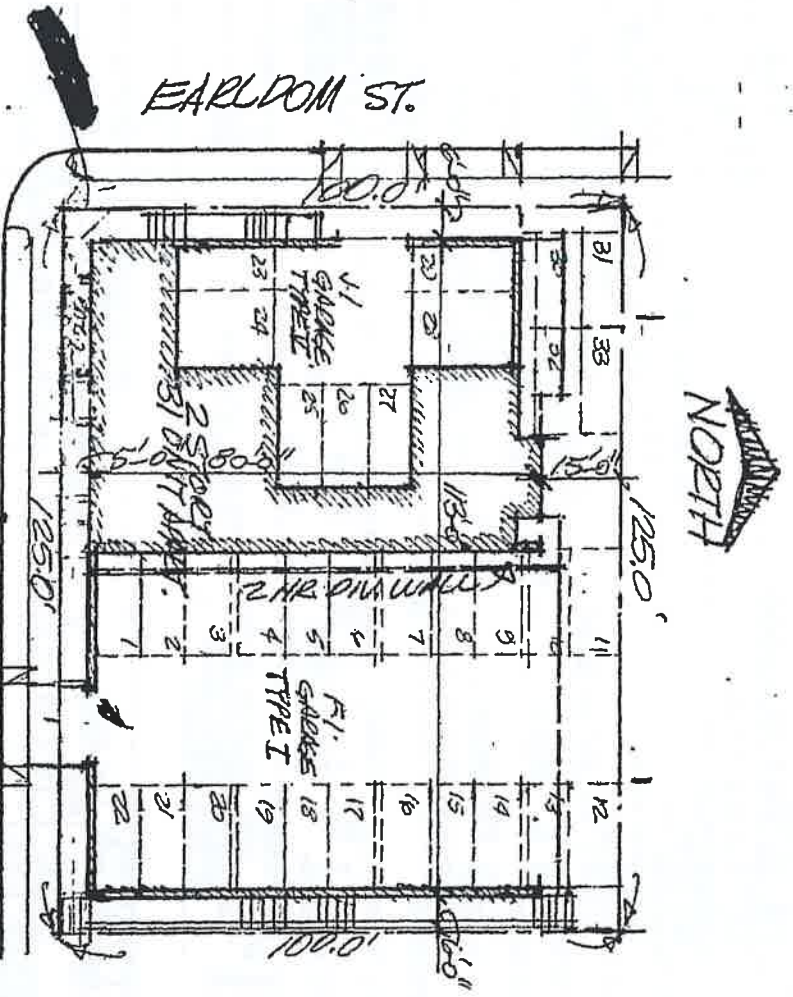
Approved for Issue **Completed**

Private Sewage Disposal System Approved **Completed**

Approved Utter **Completed**

Approved (Title 19) (L.A.M.C. 5700) **Completed**

Approved For **Completed**



405 CULLVER BLVD

INUNDATION CLEARANCE	
APPROVED BY	✓ DENIED
APPROVED BY	.....
BY	.....
BUREAU OF ENGINEERING	

FINISH FLOOR TO BE EVEN TO  
 (1 1/2 ABOVE CURB)



**APPLICANT TO RELOCATE BUILDING  
AND FOR CERTIFICATE OF OCCUPANCY**

Form B-2

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

**INSTRUCTIONS:** 1. Applicant to Complete Numbered Items Only.  
2. Plot Plan Required on Back of Original.

1. LEGAL FROM LOT 2	TRACT 23855	TO LOT BLK 14	TRACT Playa Del Rey	DIST. MAP 7194
2. PRESENT ADDRESS 8301-8303-8305 S. Rindge Avenue		ZONE C-2-1		APPROVED E. ADAMS
NEW ADDRESS 411- 1/4 - 1/2 Culver Boulevard		FIRE DIST. II		INSIDE KEY
3. BETWEEN CROSS STREETS Nicholson Street AND Earldom		USE AFTER RELOCATION Same		COR. LOT
4. PRESENT USE OF BLDG. 1st Floor = Comm		PHONE 936-6856		REV. COR.
2nd Floor = Dwell.		P.O. LA90019		LOT SIZE 25x100
5. OWNER Clyde A. Dubbs		STATE LICENSE NUMBER		REAR ALLEY
6. OWNER'S ADDRESS 1814 West Boulevard		STATE LICENSE NUMBER		SIDE ALLEY /
7. CERT. ARCH. OR LIC. ENG.		NO. OF EXISTING BUILDINGS ON LOT AND USE		BLDG. LINE /
8. CONTRACTOR		Per Plans 2		AFFIDAVITS
9. SIZE OF BLDG.		HEIGHT		DISTRICT OFFICE WLA
10. NEW WORK (DESCRIBE) Relocate as per plans		2 411 - 1/4 - 1/2 Culver Boulevard		DATE APPROVED 10-26-67
11. MATERIAL EXT. WALLS <input checked="" type="checkbox"/> STUCCO <input type="checkbox"/> WOOD <input type="checkbox"/> METAL <input type="checkbox"/> CONG. BLOCK <input type="checkbox"/> CONCRETE <input type="checkbox"/> BRICK <input type="checkbox"/> ROOF CONST. <input checked="" type="checkbox"/> WOOD <input type="checkbox"/> CONG. <input type="checkbox"/> STEEL <input type="checkbox"/> OTHER		VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING. \$ 12,000.00		CASH BOND SURETY BOND \$15,000.00
12. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING. \$ 12,000.00		I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance. The issuance of this permit will not violate any deed restrictions of record.		DWELL. UNITS
The purchase of either site or building for relocation purposes until this application is approved is at my own risk. This is an application only and does not guarantee approval. The building when relocated must be repaired so as not to be detrimental to property within 1000 feet of the new site.		Application Approved H. HIRATA		SPACES PARKING
This form when properly validated is a permit to do all the work described.		PLANS CHECKED CORRECTIONS VERIFIED PLANS APPROVED APPLICATION APPROVED		GUEST ROOMS FILE WITH
TYPE V		GROUP R&G		SEWER CAP. PER. Required
MAX. OCC. P.C. 32.50		S.P.C.		FILE NUMBER 13002
R&G		G.P.K. 42.00		O.S. R.F.

SEWER (Available) ( ) BILL ROOM 460 CRITICAL SOIL VENCE 10-9-67

OCT --9--67 48431 LA Z15--CK \$75.00

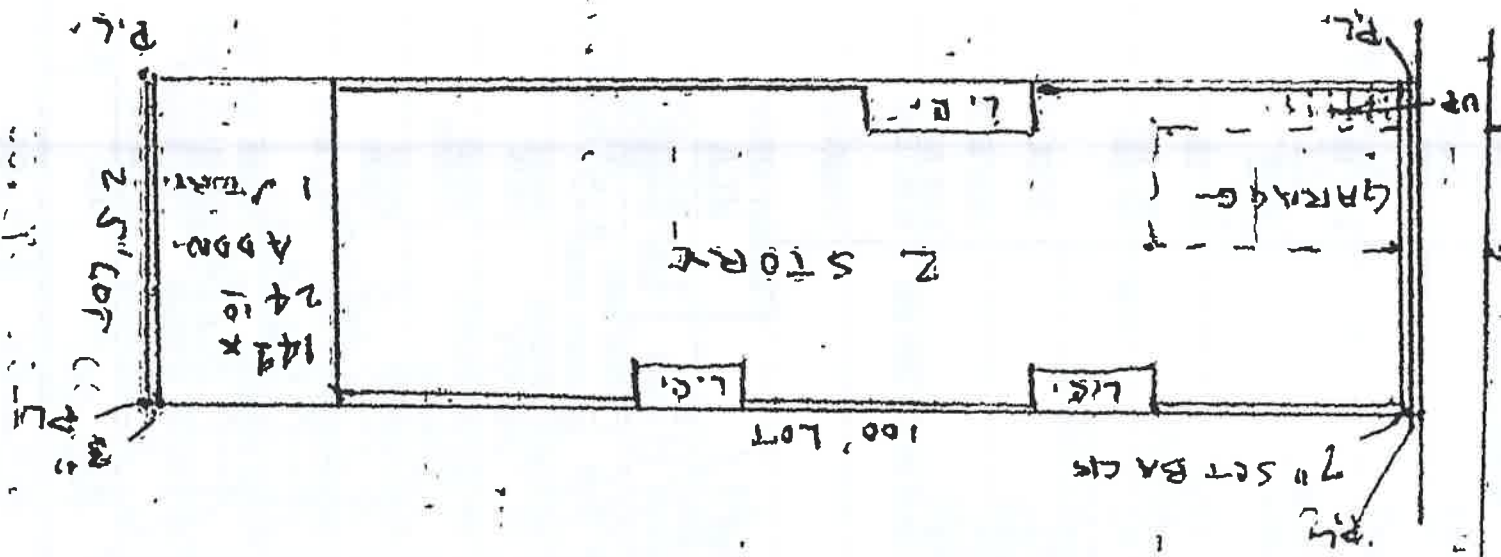
FEB-9-68 10875 D - 2 CK 32.50

MAR--6-68 11340 GRADING • 62338 CRIT. SOIL 157-CK CONS. 42.00

CASHIERS USE ONLY



CULVER BLVD.



25' COR

100' LOT

**1** APPLICATION FOR INSPECTION OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY **A-1** 245 E-1-1-Rev. 3-61  
CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY CENSUS TRACT

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only.  
2. Plot Plan Required on Back of Original.

1. LEGAL DESC. LOT 14, Tr 8, Blk 5 & 16, Tr. 16, Pt. Lot 14, Playa del Rey, 8557  
DIST. MAP 7194  
ZONE G-2-1  
FIRE DIST. II--60/100  
INSIDE COR. LOT NEARBY  
KEY LOT SIZE Irreg.

2. PURPOSE OF BUILDING (05) 14-unit Apartment House  
JOB ADDRESS 412 Culver Blvd.

3. JOB ADDRESS 412 Culver Blvd.

4. BETWEEN CROSS STREETS Earlom Ave. and Nicholson St.  
PHONE

5. OWNER'S NAME Carl E. Knutson GR 28515  
P.O. BOX 49

6. OWNER'S ADDRESS 1768 Old Ranch Road L.A. 49

7. ARCHITECT OR DESIGNER Clark Bloomfield STATE LICENSE NO. #7 GL 13008  
PHONE

8. ENGINEER Kirk Florence CR 6424 EX 57641  
STATE LICENSE NO. # PHONE

9. CONTRACTOR Owner  
STATE LICENSE NO. # PHONE

10. SIZE OF NEW BLDG. 65 x 110 STORIES 2 HEIGHT 25' NO. OF EXISTING BUILDINGS ON LOT AND USE none  
FLOOR

11. MATERIAL OF CONSTRUCTION wood&stu;cco compo. ROOF FLOOR

12. JOB ADDRESS 412 Culver Blvd.

13. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING. \$ 95,000 118,000

PURPOSE OF BUILDING Apt. Bldg.

TYPE  H-2-J-1

VALUATION APPROVED

PLANS CHECKED *[Signature]*

PLANS APPROVED *[Signature]*

APPLICANT APPROVED *[Signature]*

STORIES 2 TOTAL

BLDG. AREA 7150

MAX. OCC. ---

SPACES REQ'D 14 PROVIDED 14

PARKING 0

CONT. INSP. STEEL

SPRINKLERS

SEWER

STREET 66919W

P.C. 15470 S.P.C. 2106 G.P. 270.40 I.F. 40 O.S. AA 3190 C/O

TYPYST tev

CASHIERS USE ONLY

JAN-11-67	00720	B	3	CK	154.70
MAR--1-67	04395	B	3	CK	21.06
MAR--1-67	04396	B	6	CK	5.00
MAR--1-67	04397	B	1	CK	270.40

STATEMENT OF RESPONSIBILITY

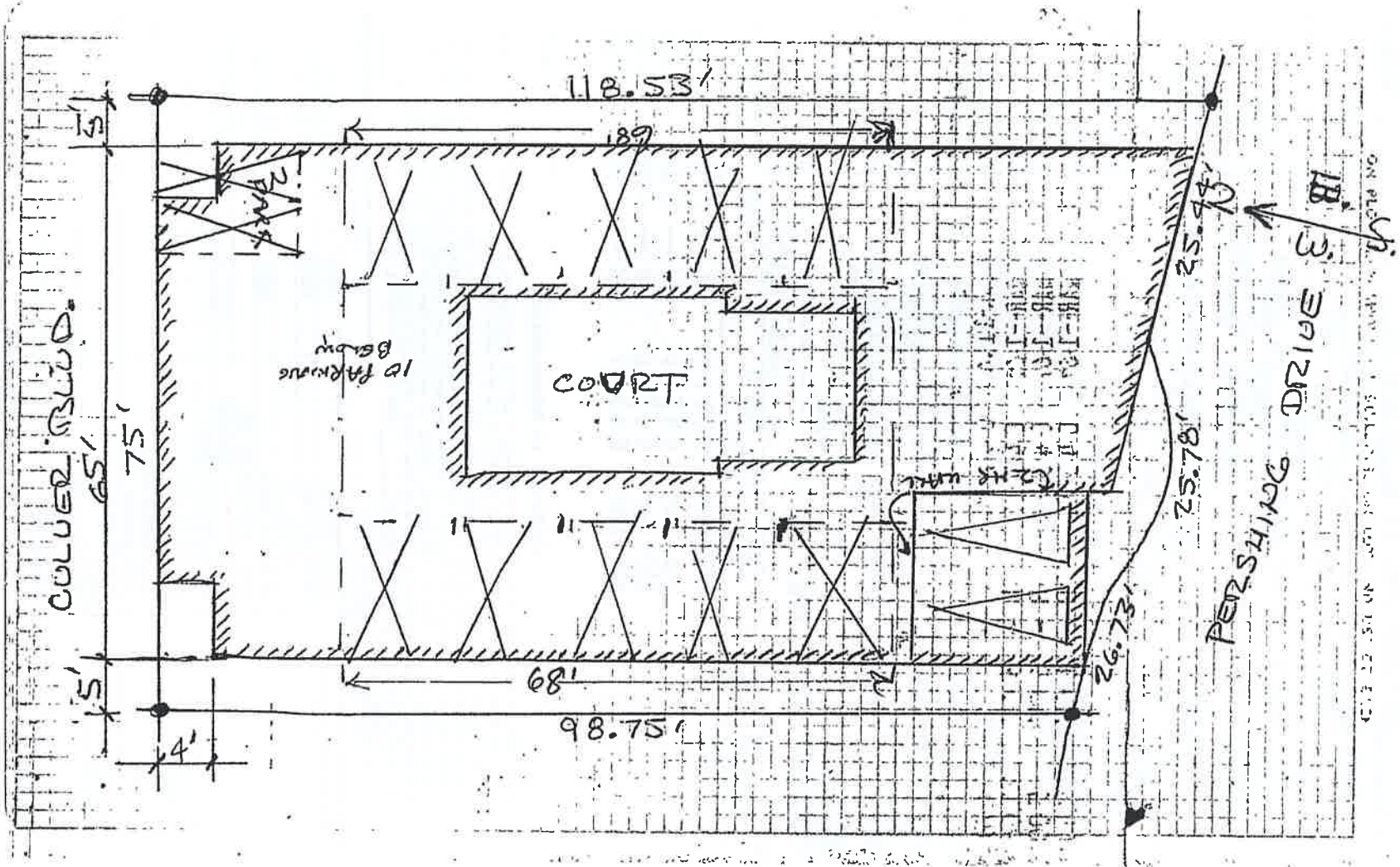
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Signed *[Signature]* (Agent or Agent)

Name	Date
MRP	1/11/67
MRP	1/11/67
MRP	1/11/67
<i>[Signature]</i>	2/27/67
Conservation	
Plumbing	
Planning	
Fire	
Traffic	





ON PLAT...  
 SOLID...  
 10' 2" 20' 30' 40' 50' 60' 70' 80' 90' 100' 110' 120' 130' 140' 150' 160' 170' 180' 190' 200'





Handwritten notes and a signature in the top section of the page.

SECRET  
UNCLASSIFIED  
DATE 05/01/01  
BY 60322/UC/STP

**1** APPLICATION FOR INSPECTION OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY  
CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY **D-2** HAS B-1-Rev. 3-64

**INSTRUCTIONS:** 1. Applicant to Complete Numbered Items Only.  
2. Plot Plan Required on Back of Original.

1. LEGAL LOT 9 TRACT 14 TOWNSITE Playa del Rey  
DESCR. 14

2. PURPOSE OF BUILDING (02) Duplex

3. JOB ADDRESS 425 Culver Blvd.  
BETWEEN CROSS STREETS Nicholson St. AND Earldom Avenue

5. OWNER'S NAME Kathryn Winebrenner P. O. BOX FR 31456  
Kathryn Winebrenner P. O. BOX ZONE  
5225 Zakon Rd., Box 1133, Torrance

7. ARCHITECT OR DESIGNER STATE LICENSE NO. PHONE

8. ENGINEER John Lander STATE LICENSE NO. PHONE CE 7171

9. CONTRACTOR Kathryn Winebrenner STATE LICENSE NO. PHONE FR 31456

10. SIZE OF NEW BLDG. STORIES 2 HEIGHT 16' NO. OF EXISTING BUILDINGS ON LOT AND USE none

11. MATERIAL OF CONSTRUCTION stucco wd. ROOF Flat ROLLED roofing plywd. FLOOR

12. JOB ADDRESS 425 Culver Blvd. *RM*

13. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING. \$ 30,000.00- 35,500 *RM*

**1** PURPOSE OF BUILDING (02) Duplex

TYPE	GROUP	STORIES	VALUATION APPROVED
R	R	2	<i>RM</i>
BLDG. AREA 1575 sq	MAX. OCC. -	TOTAL	PLANS CHECKED <i>RM</i>
DWELL UNITS 2	GUEST ROOMS 0	SPACES PARKING 4	PLANS APPROVED <i>RM</i>
SPRINKLERS REQ'D	CONT. INSP. STEEL FAB.	APPLICATION APPROVED	ZONED BY Chu
P.C. MAR 21 67	67181 W.		FILE WITH

INSPECTOR

P.C.	69.55	S.P.	9.75	G.P.I.	B.P.	122.00	I.F.	O.S.	C/O	TYPIST	JS
MAR-3-67 04544 C-3 CK 69.55											
MAR-21-67 05968 C-3 CK 9.75											
MAR-21-67 05969 C-1 CK 122.00											

CASHIERS USE ONLY

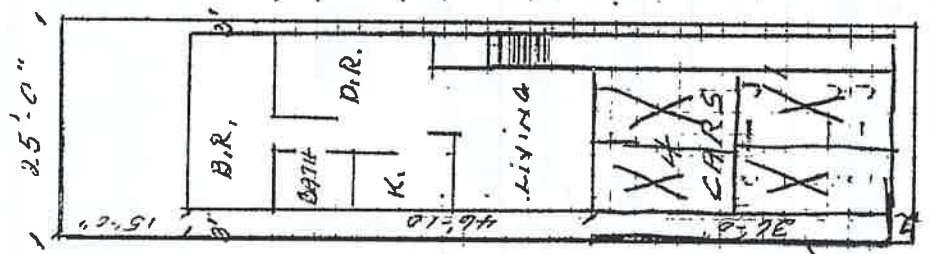
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Signed *Kathryn Winebrenner*  
(Owner or Agent)

	Name	Date
Bureau of Engineering	DAN DAN	
ADDRESS APPROVED	DAN	
SEWERS AVAILABLE	DAN	
NOT AVAILABLE		
DRIVEWAY APPROVED	DAN	
HIGHWAY DEDICATION <del>APPROVED</del> COMPLETED	<i>Kathryn Winebrenner</i>	<i>Mar 21 67</i>
FLOOD CLEARANCE APPROVED		
APPROVED FOR ISSUE FILE #		
PRIVATE SEWAGE DISPOSAL SYSTEM APPROVED		
APPROVED UNDER CASE #		
APPROVED (TITLE 19) (L.A.M.C.-S700)		
APPROVED FOR		



25'-0"

100'-0"

425 CULVER BLVD.

100' x 25'







4/11/83 09 *Multiple Districts* *8/1-83*

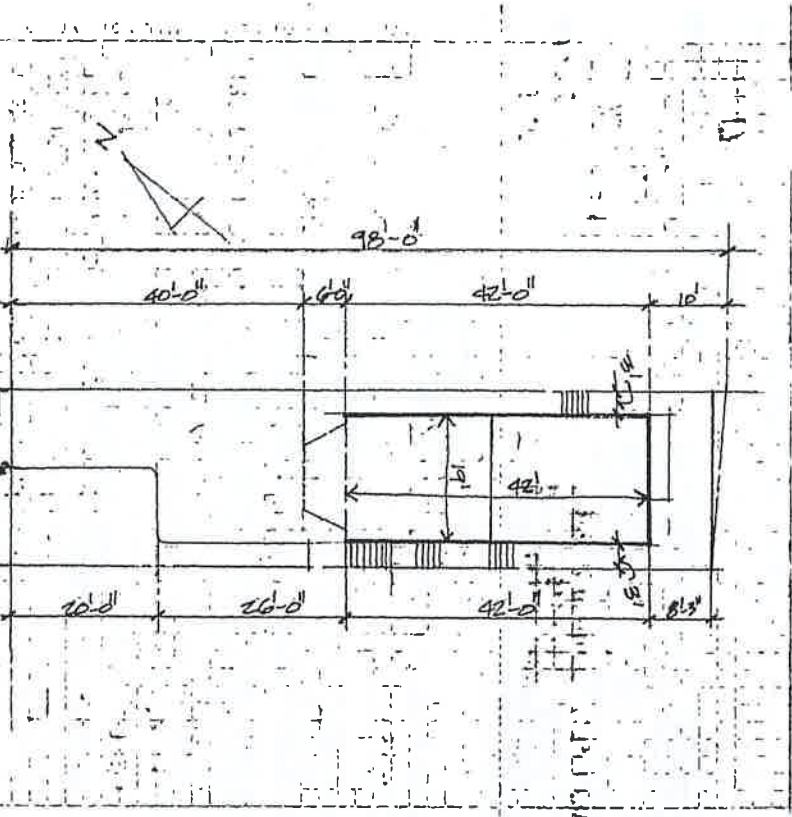
~~SECRET~~  
WCA

*47500*  
*10/13/83*  
*8/1/83*

STATE CAPITAL PERMIT 5-73-225

C-120966

41



*to move with def driveway*

CLIVER BOND

*Eugene Kim*



known to me to be the person(s) whose name(s) is subscribed to the within instrument and acknowledged that he executed the same for the purposes therein contained. IN WITNESS WHEREOF, I hereunto set my hand and official seal.

John Jelliffe

the undersigned Notary Public, personally appeared

On this the 10th day of January 1984, before me,

State of California }  
 County of Los Angeles }  
 ss.

4 1 0 9 4





61

APPLICATION TO CONSTRUCT NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY

BBS Form B-1

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LEGAL DESCOR.	LOT 8	BLK. 14	TRACT Praya Del Rey Trst	ADDRESS APPROVED DHB
2. JOB ADDRESS	427 Culver Blvd.			DIST. MAP 7194
3. BETWEEN CROSS STREETS	Nicholson AND Freedom			ZONE C 2 1
4. PURPOSE OF BUILDING	Store Office & Apt.			FIRE DIST. II
5. OWNER'S NAME	Martin Snell			INSIDE XXX
6. OWNER'S ADDRESS	362 1329			KEY 80'
7. CERT. ARCH.	Martin Snell			COR. LOT
8. LIC. ENGR.	K			REV. COR.
9. CONTRACTOR	Owner			LOT SIZE 25x100
10. CONTRACTOR'S ADDRESS	427 Culver Blvd.			REAR ALLEY
11. SIZE OF NEW BLDG.	25 x 47	2 STORIES	22' HEIGHT	SIDE ALLEY
12. MATERIAL	WOOD ROOF			BLDG. AREA 1000 sq'
13. VALUATION	\$45,000.00			DISTRICT OFFICE WLA

SEWER (Available) (Not Available) **Ok for 12' driveway** **DHB**

CRITICAL SOIL

12. MATERIAL  WOOD  METAL  CONG. BLOCK  ROOF  WOOD  ASPHALT  OTHER COMPO

EXT. WALLS:  STUCCO  BRICK  CONCRETE  CONG.  OTHER COMPO

VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING. \$45,000.00

Approval of driveway location must be obtained from the Department of Public Works before securing Building Permit.

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance and I have read reverse side of application.

Signed: *[Signature]*  
 This Form When Properly Validated is a Permit to Do the Work Described.

TYPE IV	GROUP 6-1/2	MAX. OCC. 13	P.C. 24.00	S.P.C. 6.80	G.P.I. 61.60	I.F. 24.00	O.S. 61.60	C/OI
OAPC 6027 4-19-63 24.00 SPC 63.58 5-15-63 6.80 13P. 45987 5-15-63 61.60								

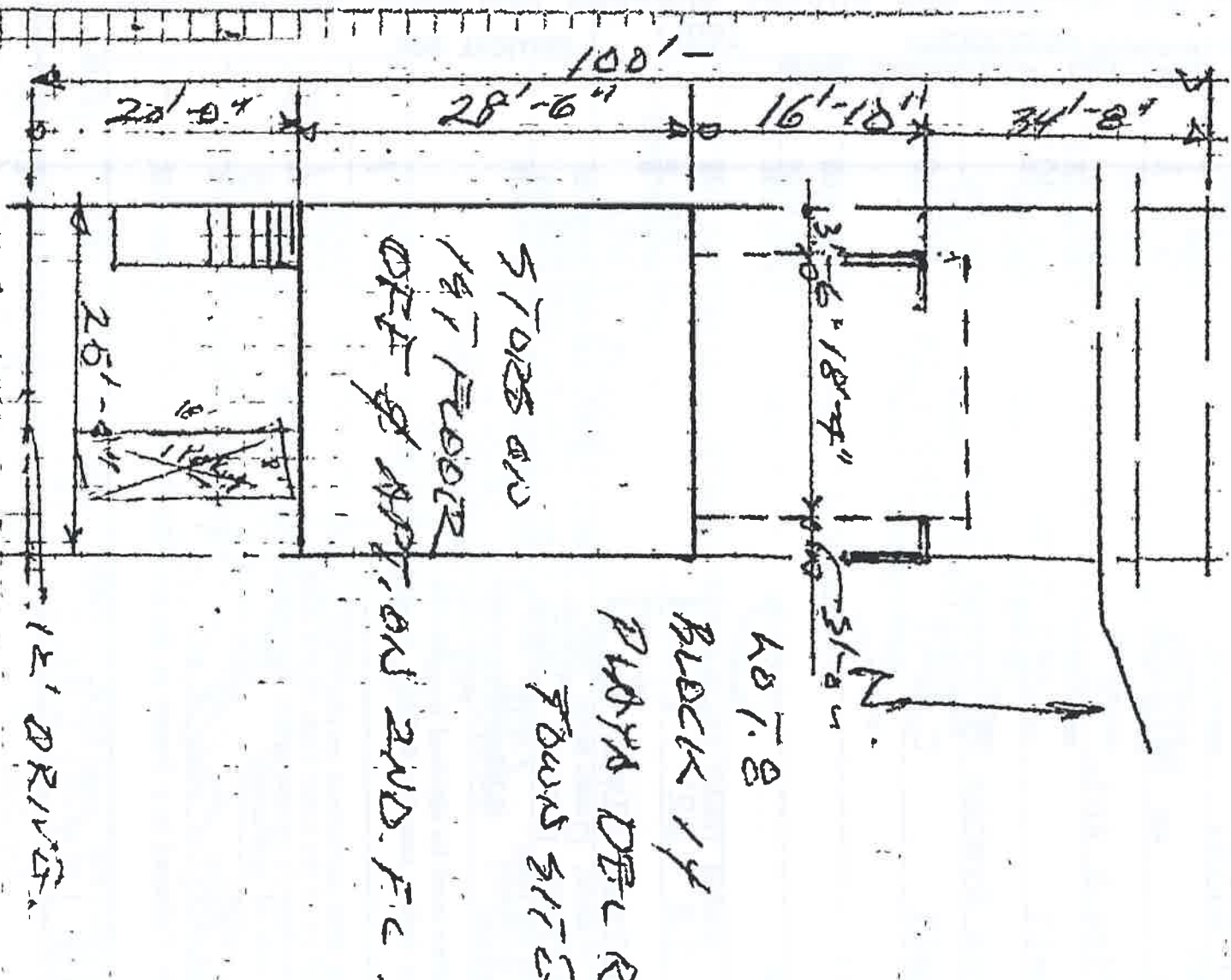
CASHIER'S USE ONLY

P.C. No. GRADING CRIT. SOIL CONS.



LEGAL DESCRIPTION: OK for 1 apron only--12" in the flat at the East end of the lot. This is not an approval of the apron until permission is granted by the Dept. of W. & Power to move the power pole... DHB

Pole #1204790E has sufficient clearance for driveway apron... J.S. Stitzer, So. Cal. Edison Co.



IMPROVEMENT CLEARANCE

APPROVED BY: *[Signature]*

BY: *[Signature]*

BUREAU OF ENGINEERING

Highway Dedication and/or Improvements COMPLETED in accordance with Ordinance No. 120796, 5-19-66  
 LYALL A. PARDEE, City Engineer by *[Signature]*

Application of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed." See Sec 91 0202 L.A.M.C.)

1 APPLICATION

CITY OF LOS ANGELES DEPT OF BUILDING AND SAFETY

OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY

INSPECTION 1 AD + B + C + D + E + F + G + H + I + J + K + L + M + N + O + P + Q + R + S + T + U + V + W + X + Y + Z

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

1. LOT BLOCK TRACT SUBMITL DISTRICT NO. DIST MAP  
 LEGAL 7 8142 7194  
 DESCR. 7 2781

2. PURPOSE OF BUILDING CENSUS TRACT  
 1 Single Family House 2781

3. JOB ADDRESS ZONE  
 428 Culver Blvd. G2-1  
 BETWEEN CROSS STREETS FINE DIST.  
 Nicholson St. AND EARLOOM Ave. TWO

5. OWNER'S NAME CITY ZIP  
 John Jelliffe 258-0034

6. OWNER'S ADDRESS CITY ZIP  
 1448 E. Chevy Chase Glendale 91206  
 BUS. LIC. NO. ACTIVE STATE LIC. NO. PHONE  
 Nick Sonnega SEA295 246-2388

8. ARCHITECT OR DESIGNER BUS. LIC. NO. ACTIVE STATE LIC. NO. PHONE  
 Stauff Ann 04137 388-4118

9. ARCHITECT OR ENGINEER'S ADDRESS CITY ZIP  
 1543 W. Olympian LA 90015

10. CONTRACTOR BUS. LIC. NO. ACTIVE STATE LIC. NO. PHONE  
 Owner

11. SIZE OF NEW BLDG. STORIES PERMIT NO. OF EXISTING BUILDINGS ON LOT AND USE  
 WIDTH 19 LENGTH 42 2 28 None

12. MATERIAL OF EXT. WALLS ROOF FLOOR STREET GUIDE  
 CONSTRUCTION → masonry tile/comp wood

13. JOB ADDRESS  
 428 Culver Blvd  
 14. VALUE OF IMPROVEMENTS AND EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING \$0,000

2 of 2 TV=\$120,000 \$0,000

PURPOSE OF BUILDING	FLOOR AREA	STORIES	HEIGHT	FILE WITH
SPD 7 Attached Garage	1600	2	31	Vercher
TYPE X				
DWELL UNITS				
GUEST ROOMS				
P.C.				
S.P.C.				
B.P.	459.14			
T.F.				
O.S.				
DIST. OFFICE				
P.C. NO.				
PLAN CHECK EXPIRES ONE YEAR AFTER FEE IS PAID. PERMIT EXPIRES TWO YEARS AFTER FEE IS PAID OR 180 DAYS AFTER FEES PAID IF CONSTRUCTION IS NOT COMMENCED.				

SPRINKLERS ENERGY YES

SEISMIC STUDY ZONE ALA

SPREADING YES FLOOD -

HWY. DEED. CONS. -

SEISMIC STUDY ZONE ALA

FILE WITH Vercher

INSPECTION ACTIVITY RG

COMB. GEN. MAJ. S. I. CONS.

6-44 E-1  
 9-31 OSS  
 459.14 B-C1  
 83833 0001

81168 2 03/09/84 474.89 CHTD

CASHIERS USE ONLY

E908 468.69 B-FC 9/1/82

BAB-1R2301

15. I hereby affirm that I am licensed under the provisions of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.

Date \_\_\_\_\_ Lic. No. \_\_\_\_\_ Contractor's Signature \_\_\_\_\_

Contractor's Mailing Address \_\_\_\_\_

16. I hereby affirm that I am exempt from the Contractor's License Law for the following reason (Sec. 7031.5, Business and Professions Code): Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he is licensed pursuant to the provisions of Chapter 9 of Division 3 of the Business and Professions Code, and that he is exempt therefrom on the basis of the alleged exemption. Any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500). I, as owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business and Professions Code). The Contractor's License Law does not apply to the property who builds or improves a structure on his own property for his own use, or through his own employees, provided that such work is not intended for sale. If, however, the contractor is to be paid for the work, the contractor, at the time of completion, the owner-builder will have the burden of proving that he did not build or improve for the purpose of sale.

I, as owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business and Professions Code). The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractor's License Law.

I am exempt under Sec. B. & P. C. for the reason \_\_\_\_\_

Date 1-10-84 Owner's Signature John Jelliffe

WORKERS' COMPENSATION DECLARATION

17. I hereby affirm that I have a certificate of consent to self-insure, or a certificate of Worker's Compensation Insurance, or a certified copy thereof (Sec. 3800, Lab. C.).

Policy No. \_\_\_\_\_ Insurance Company \_\_\_\_\_

Certified copy is hereby furnished.

Certified copy is filed with the Los Angeles City Dept. of Bldg. & Safety.

Date \_\_\_\_\_ Applicant's Signature \_\_\_\_\_

Applicant's Mailing Address \_\_\_\_\_

18. I certify that in performance of the work for which this permit is issued, I shall not employ any person in any manner so as to be subject to the Workers' Compensation Laws of this state.

Date 1-10-84 Applicant's Signature John Jelliffe

NOTICE TO APPLICANT: If, after making this Certificate of Exemption, you should become subject to the Workers' Compensation provisions of the Labor Code, you must forthwith comply with such provisions or this permit shall be deemed revoked.

19. I hereby affirm that there is a construction lending agency for the performance of the work for which this permit is issued (Sec. 3097, Civ. C.).

Lender's Name \_\_\_\_\_

Lender's Address \_\_\_\_\_

20. I certify that I have read this application and state that the above information is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes.

I realize that this permit is an application for inspection, that it does not approve or authorize the work specified herein, and that the applicant is responsible for obtaining all necessary permits from the City of Los Angeles, the County of Los Angeles, and the State of California, and for obtaining all necessary insurance or results of any work described herein or the condition of the property or soil upon which such work is performed. (See Sec. 91.007 LAMC)

Signed John Jelliffe Owner or agent having property owner's consent

Position owner Date 1-10-84

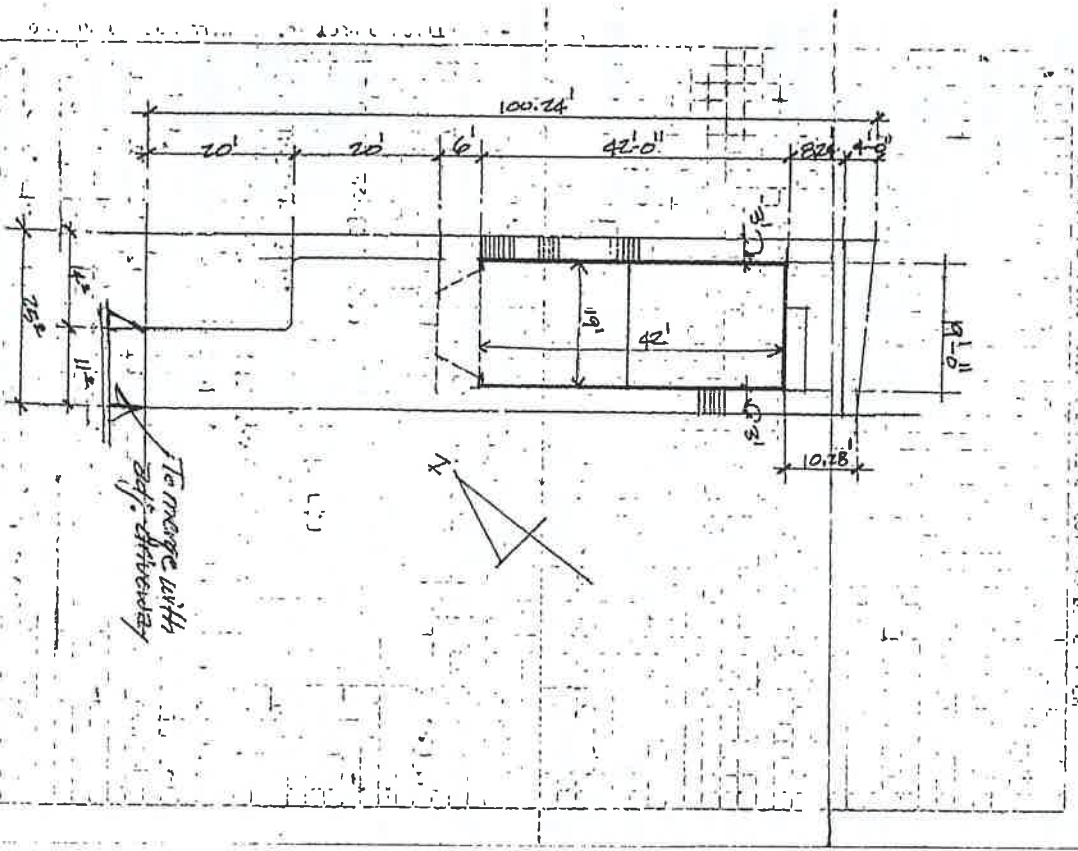
CONSTRUCTION LENDING AGENCY



1. A 2224 9 D. M. O. 8171-83  
23571. M. O. with ad. (C. M. O. 2/1/83)

~~Site Report~~ ~~W.C.A.~~ ~~47500~~  
have 10/31/83  
same 8/19/83

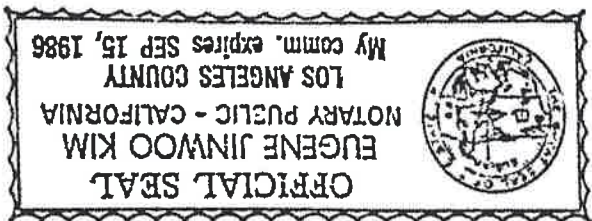
Site Control Number 8-83-229  
E-120167  
PR 2-11-84



CULVER BLVD.



*[Handwritten signature]*



known to me to be the person(s) whose name(s) is subscribed  
to the within instrument and acknowledged that he  
executed the same for the purposes therein contained.  
IN WITNESS WHEREOF, I hereunto set my hand and official seal.

John Jelliffe

the undersigned Notary Public, personally appeared

On this the 10th day of January 19 84, before me,

State of California }  
County of Los Angeles }  
ss.

100900



APPLICATION FOR INSPECTION OF NEW BUILDING AND FOR CERTIFICATE OF OCCUPANCY

LOS ANGELES DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only. 2. Plot Plan Required on Back of Original.

LEGAL DESCR. LOT 1, 2, X(5) TRACT ~~17~~ **Del Rey Towers** DIST. MAP **6/7194**  
 CENSUS TR. **2781.00**  
 ZONE **C2-1**

2. PURPOSE OF BUILDING **Restaurant & Amusement**

3. JOB ADDRESS **459 Culver Blvd**

4. BETWEEN CROSS STREETS **N Nicholson** AND **Brinddon**

5. OWNER'S NAME **Robert Eilertsen** CITY **P.d.Rey** ZIP **821-3000**

6. OWNER'S ADDRESS **6309 Ocean Front Walk**

7. ENGINEER **Chang W. Ahn** STATE LICENSE NO. **21491** PHONE **4777685**

8. ARCHITECT OR DESIGNER **M.A. Flores** STATE LICENSE NO. **821-8507** PHONE **4777685**

9. CONTRACTOR **Owner** STATE LICENSE NO. **821-8507** PHONE **4777685**

10. BRANCH LENDER

11. SIZE OF NEW BLDG. **2** STORIES HEIGHT **21** NO. OF EXISTING BUILDINGS ON LOT AND USE **none**

12. MATERIAL OF CONSTRUCTION **stucco** ROOF **comp** FLOOR **wd/conc**

13. JOB ADDRESS **459 Culver Blvd.**

14. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING **6000**

15. DIST. OFFICE **WLA**

16. CRIT. SOIL **CZCA**

17. GRADING **YES**

18. HIGHWAY DED. **YES**

19. FLOOD? **YES**

20. CONS. **1**

PURPOSE OF BUILDING **RESTAURANT**

TYPE **V** GROUP **B2/G2** PLANS CHECKED **S. Magnusson**

BLDG. AREA **2550** SF MAX. OCC. **194** TOTAL **194** (see above) APPROVED

UNITS **0** GUEST ROOMS **0** PARKING **0** PROVIDED EXPLANATION APPROVED

SPRINKLERS **no** COM. INSP. **no** INSPECTION ACTIVITY **1**

P.C. No. **18234** S.P. **238** B.P. **2425** I.F. **15-02** O.S. **6-04**

PLAN CHECK EXPIRES SIX MONTHS AFTER FEE IS PAID. PERMIT EXPIRES ONE YEAR AFTER FEE IS PAID OR SIX MONTHS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.

CASHIER'S USE ONLY

APR-2-74 **17066 W 98978** **6** **9** **6** **CC** **18232**

APR-2-74 **17066 W 98978** **0** **L** **=** **9** **CC** **2380**

APR-2-74 **17066 W 98978** **0** **L** **=** **1** **CC** **24250**

STATEMENT OF RESPONSIBILITY

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed. (See Sec. 91.0202 L.A.M.C.)

Signature: *Robert Eilertsen* (Owner or Agent)

Bureau of Engineering Plans to be available at Westch/Venice BS 2/27/74

ADDRESS APPROVED **NO SEWER/PLUMBING REQD.**

SEWERS **NO SEWER/PLUMBING REQD.**

SFC NOT APPLICABLE

SFC PAID

SFC DUE

DRIVEWAY **30' driveway into County of P.d.Rey**

HIGHWAY DEDICATION **REQUIRED**

COMPLETED **3-28-74**

FLOOD CLEARANCE **Excluded From Flood Clearance**

APPROVED FOR ISSUE  NO FILE

APPROVED (TITLE 19) (L.A.M.C. 5700)

PRIVATE SEWAGE SYSTEM APPROVED

APPROVED UNDER CASE #

APPROVED FOR

Signature/Date **BS 2/27/74**

**State of California**

**Robert Eilertsen** 3-28-74

**Robert Eilertsen** 3-28-74

**Robert Eilertsen** 3-28-74

**Robert Eilertsen** 3-28-74









OK TO ISSUE PERMIT 2/25/94

BY [Signature]

DEDICATION DATE: See 2nd page (2/25/94) 2/25/94  
 ED-PERMIT: BD460969 FOR ZA 91-0855

Bureau of Engineering	31 Dept along Culver Blvd	ADDRESS APPROVED FULLER	11-25-92
Engineering	175 ft Corner of	HIGHWAY REQUIRED	11-25-92
General	along Nicholson St.	DEDICATION COMPLETED	10-3-78
Res. No.	WIA 03-455 0092	SEWERS AVAILABLE	2/23/94
CERT. NO.	R9230 0447 EXTEND LUMBER SHED	NOT AVAILABLE/DAS	11-25-92
	Y: 7194-3	SEC PAID	2/23/94
		SEC DUE	11-25-92

Grading	PRIVATE SEWAGE SYSTEM APPROVED	SEC NOT APPLICABLE	<input checked="" type="checkbox"/>	FILE CLOSED	<input type="checkbox"/>
Comm. Safety	APPROVED FOR ISSUE				
Fire	APPROVED TITLE TO (L.A.M.C. 5700)				
Housing	HOUSING AUTHORITY APPROVED				
Planning	APPROVED UNDER CASE # 015 85-5117				
Transportation	APPROVED FOR 24 DWG 13 DWG IN NICHOLSON				
Construction Tax	RECEIPT NO.	DWELLING UNITS			

LEGAL DESCRIPTION: SEE 14001 C-91-0576, 20-91-0855, 20-92-0872  
COMM. DISTRICTIVE SCHOOL DIST. RD-14155 X.0.09-3983.8.

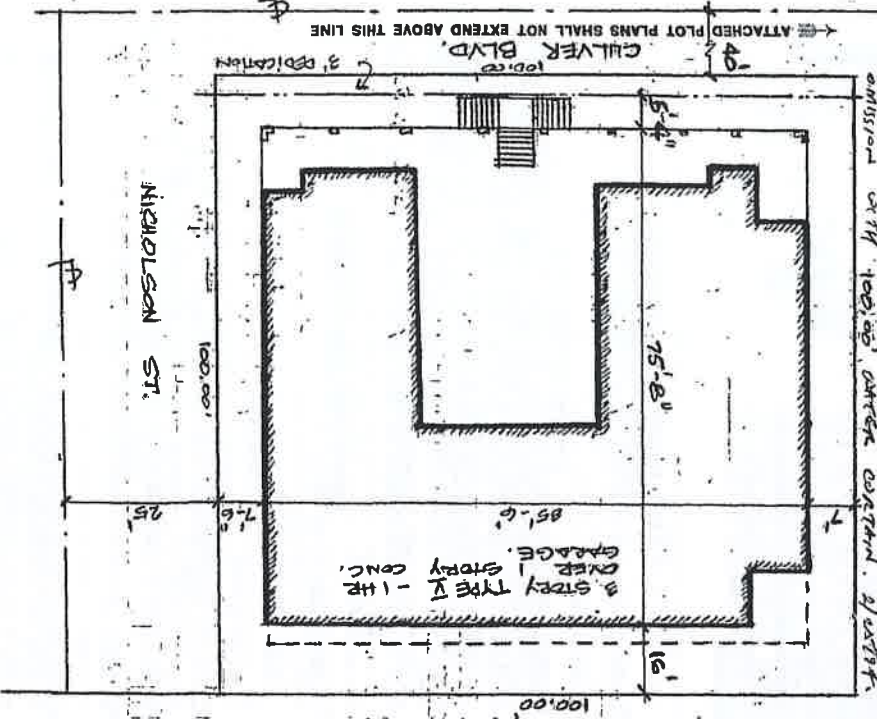
APR 28 1994  
 BUREAU OF ENGINEERING (QUIB RAMP)  
 0 0 7 approved by [Signature] for [Signature] 11-4-93

UNDER PENALTY OF PERFECTION OF THE PROPOSED WORK WILL NOT DESTROY OR UNREASONABLY INTERFERE WITH ANY ACCESS OR EASEMENT BELONGING TO OTHERS AND TO BE DETROYED OR INTERFERED WITH SUCH EVENT SUCH WORK SHALL BE DETROYED OR INTERFERED WITH AT THE FACTORY TO THE CREDITORS OF THE EASEMENT WILL BE PROVIDED.

SIGNED: [Signature] DATE: 2/25/94

ZA 92-07122V) ALLOWS TRAVEL PARKING FOR  
 7X1-14 CARS AND PERMITTED AND ALLOWS PARKING  
 UP OF 2 CARS ON STREET. ALSO ALLOWS 60' WIDE  
 AND 155' WIDE PARK. Urban Retail (1/1/93)

LOT 77E # 93-2072237 CHG-0514 C-92-07122V  
 AND 115' WIDE PARK. DISTRICT 100 VIOLETS 5-22-94  
 \* Complied with Provisions of Ordinance 168,999 (211874)  
 Provisions of Ord. # 160,574 (211512) Betty Buckley 11/22/93  
 modification obtained for 1/4 CR. First meeting  
 on 1/14/94. 100' wide street corner of street.



← ATTACHED PLOT PLANS SHALL NOT EXTEND ABOVE THIS LINE



CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

LA15189

No. 5193

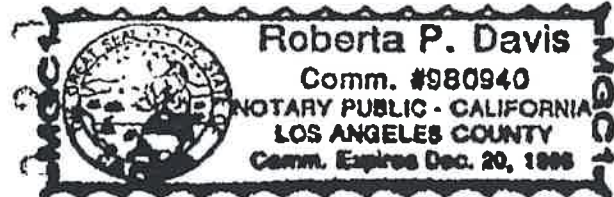
State of CALIFORNIA

County of LOS ANGELES

On Nov. 18, 1993 before me, ROBERTA P. DAVIS, Notary Public  
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"

personally appeared SUSAN ZOLLA  
NAME(S) OF SIGNER(S)

personally known to me - OR -  proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.  
Roberta P. Davis  
SIGNATURE OF NOTARY

OPTIONAL SECTION

CAPACITY CLAIMED BY SIGNER

Though statute does not require the Notary to fill in the data below, doing so may prove invaluable to persons relying on the document.

- INDIVIDUAL
- CORPORATE OFFICER(S)  
TITLE(S) \_\_\_\_\_
- PARTNER(S)  LIMITED  GENERAL
- ATTORNEY-IN-FACT
- TRUSTEE(S)
- GUARDIAN/CONSERVATOR
- OTHER: \_\_\_\_\_

SIGNER IS REPRESENTING:

NAME OF PERSON(S) OR ENTITY(IES)  
\_\_\_\_\_  
\_\_\_\_\_

OPTIONAL SECTION

THIS CERTIFICATE MUST BE ATTACHED TO THE DOCUMENT DESCRIBED AT RIGHT:

TITLE OR TYPE OF DOCUMENT APPLICATION FOR INSPECTION OF NEW BUILDING

NUMBER OF PAGES 1 ~~THESE~~ DATE OF DOCUMENT 11/18/93

Though the data requested here is not required by law, it could prevent fraudulent reattachment of this form.

SIGNER(S) OTHER THAN NAMED ABOVE \_\_\_\_\_



EXHIBIT B





# APPEL DESIGN & DEVELOPMENT

June 13, 2018

Zoning and Planning Administrator  
Re 132 Culver Blvd  
Case # DIR-2012-3537-CDP-DB-SPR-MEL

I am writing as a licensed architect who lives and has worked in Playa Del Rey for 45 years, to express my opposition to this project as currently designed. I feel this massive structure is totally inconsistent with the nature and character of the Playa Del Rey community. I have learned over 40 years of practice that communities are defined by their architecture, and that architecture is defined in a major way by the size of the permitted lots with the subsequent set back and height and open space requirements. Those requirements limit size and more importantly the appearance of bulk of the resulting structures.

Playa Del Rey is a small beach side community with one 3 block commercial street (Culver Blvd.) The lots on Culver Blvd are typically 25' x 100'. The developments on Culver reflect the size of those lots. They are typically 2 and 3 story apartment and office structures with some single story restaurants mixed in. There is 1 commercial building that has a partial 4<sup>th</sup> floor but due to a major set back from Culver Blvd it is not really visible when traveling down Culver. Some of those developments are on combined lots with the largest one being on 5 contiguous lots (405 Culver Blvd). That structure has an unbroken mass of approximately 110 linear feet and 3 stories in height. This compares with 13 contiguous lots and an unbroken mass of 308 linear feet and four stories for the proposed development fronting Vista Del Mar and Culver Blvd.

By allowing the combining of so many lots, this project eliminates the requirement of side yard set backs between lots and changes totally the nature of bulk density and visual separation of the resulting project. As a result this development is over 3 times the mass of the largest existing structure in our small commercial area. I would recommend opening up some view corridors in the areas above the first level. Those openings would reduce the visual bulk and density of this development and make this project more compatible with the existing nature of our community.

Mark Appel  
Architect  
Playa Del Rey





EXHIBIT C





# Line of Sight Exhibit

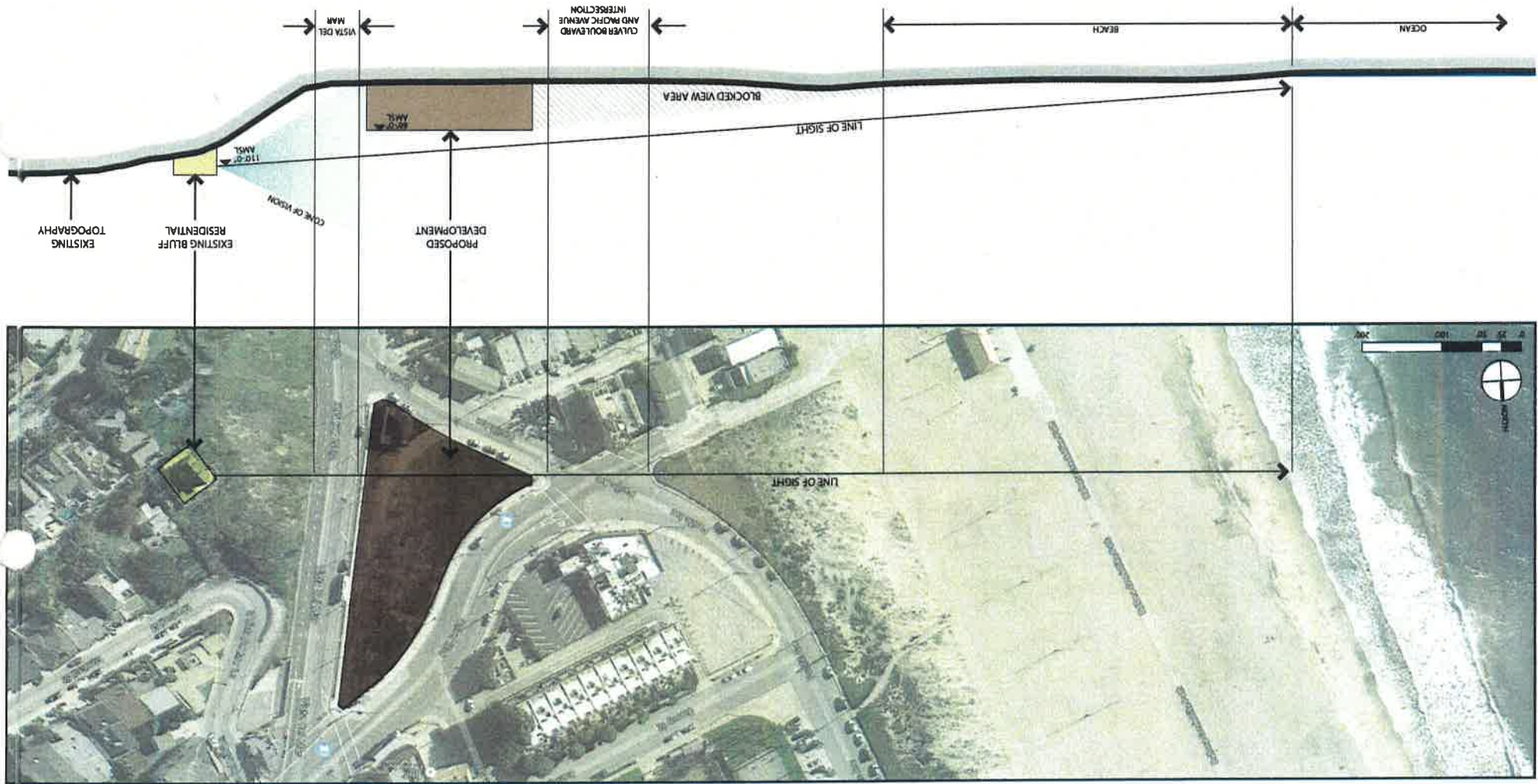




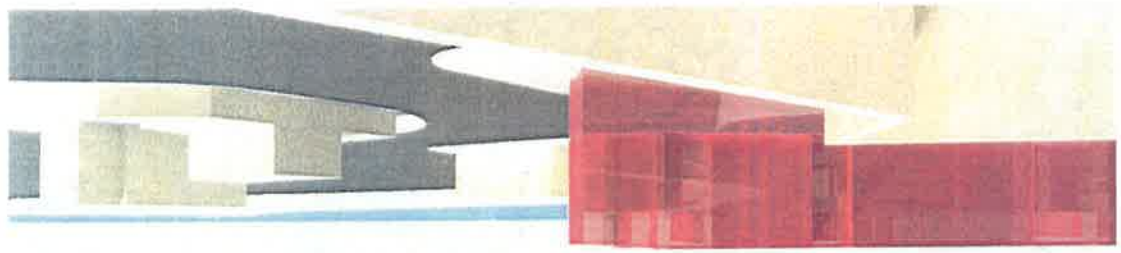




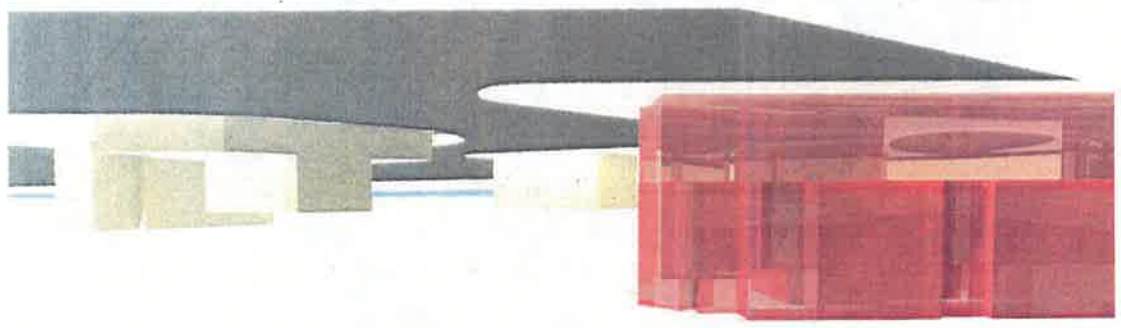
Fig. A | Top of Montreal



Fig. B | Midway down Montreal



View from house at base of Montreal



View from base of Montreal

## 138 Culver Visual Impact Study

This study investigates the visual impact of new development from Montreal Street towards the Pacific Ocean over the intended 138 Culver Blvd. site.



Site Plan



EXHIBIT D



**To:** Brower, Neill  
**Cc:** Reznik, Benjamin M.; Debbie Lawrence; Iris Wan

[Quoted text hidden]

[Quoted text hidden]

**Juliet Oh** <juliet.oh@lacity.org>

To: "Reznik, Benjamin M." <BMR@jimbm.com>

Cc: "Brower, Neill" <nb4@jimbm.com>, Debbie Lawrence <debbie.lawrence@lacity.org>, Iris Wan <iris.wan@lacity.org>, "faisal.roble@lacity.org" <faisal.roble@lacity.org>

Mon, Nov 20, 2017 at 8:04 AM

You can review the SLR study submitted for a pending appeal with the Coastal Commission for a project at 305 Ocean Front Walk (Venice). This is a 3-story mixed-use project with two subterranean parking levels. No appeals were filed at the local level, however the Coastal Commission appealed the City's permit during the 20-day review.

You can review the item (staff report/exhibits) on the CCC's November Agenda: <https://coastal.ca.gov/meetings/agenda/#2017/11>

[Quoted text hidden]

**Juliet Oh** <juliet.oh@lacity.org>

To: Debbie Lawrence <debbie.lawrence@lacity.org>

Tue, Nov 28, 2017 at 5:28 PM

We are requiring the applicant to provide a sea level rise study to discuss the potential hazard. See below:

----- Forwarded message -----

**From:** Juliet Oh <juliet.oh@lacity.org>

**Date:** Wed, Nov 8, 2017 at 11:51 AM

**Subject:** Re: 138 Culver: Detail for Open Space Areas [JMBM-LA.72852.0002.FID1241406]

[Quoted text hidden]

[Quoted text hidden]



- Shoreline, dune, or bluff edge position, accounting for long-term erosion and assuming an increase in erosion from sea level rise
  - ***For development along low-lying shorelines*** Tidal range/intertidal zone accounting for an increase in elevation and inland migration due to sea level rise
  - Inland extent of flooding and wave run-up or overtopping associated with both storm (100-year or greater) and non-storm conditions, accounting for the long-term inland migration of the shoreline due to sea level rise
- c. Safety of the proposed structure from current and projected future hazards, including:
- Identification of a safe building envelope on the site that avoids identified hazards
  - Identification of design or siting options to minimize hazards if no safe building envelope exists
  - Analysis of the adequacy of the proposed building/foundation design to ensure stability of the proposed project relative to expected inundation, flooding, wave run-up or overtopping, and sea level rise for the anticipated life of the development in both storm and non-storm conditions
  - Description of any proposed future sea level rise adaptation measures, such as incremental removal or relocation when threatened by coastal hazards
- d. Discussion of the assumptions used in the analysis including:
- The data, calculations, and/or other resources used to determine long-term erosion and the elevation and inland extent of current and future flooding and wave runup

***Flood Risk, Wave Run-Up, and Overtopping Analysis:*** The analysis should address current flood hazards as well as flood hazards associated with sea level rise over the anticipated life of the project and should include a description of both day-to-day conditions (current and future daily tidal inundation) as well as extreme conditions (e.g., King Tides, storm events).

- To examine current risks and impacts from flooding, including daily tidal inundation, wave impacts, runup, and overtopping, the site should be examined under conditions of a seasonally eroded shoreline combined with a large storm event. Flood risks should take into account daily and annual high tide conditions, water level rise due to El Niño and other atmospheric forcing, storm surge, and waves associated with a large storm event (such as the 100 year storm or greater). The analysis should consider impacts both with and without any existing shoreline protection.
  - Future flood risk analyses should account for the seasonally eroded shoreline, storm events, and the long-term erosion and inland migration of the shoreline associated with sea level rise. For new development, redevelopment, or additions, the analysis should assume that any current armoring does not exist, such that the site would erode in a manner similar to unarmored sites in the same vicinity. Future long-term erosion should be based upon the best available information, using resources such as the highest historic retreat rates, COSMOS projections, or shoreline change models that take changing sea level into account. Once the appropriate shoreline change has been determined, the same type of flood analyses identified above should be addressed (inundation, flooding, wave runup, and overtopping associated with daily and annual high tides, El Niño, storm surge, and waves from large storm event (i.e. the 100-year event)).
  - A range of sea level rise scenarios should be examined to understand the range of potential impacts that may occur throughout the future. Flood risk from the highest projected sea level rise over the anticipated life of the development, based on the current best available science, should be examined for the conditions noted in the above bullet. If the proposed site/project will avoid impacts from the highest sea level rise projection plus an extreme storm event over its anticipated lifetime, no other sea level rise scenarios need to be assessed. If avoidance is not possible, additional analyses using lower sea level rise scenarios should be undertaken to determine the sea level rise threshold that could be addressed through hazard avoidance or minimization.
  - Additionally, the analysis should consider the frequency of future flooding impacts (e.g., daily impacts versus flooding from extreme storms) and describe the extent to which the proposed development would be able to avoid, minimize, and/or withstand impacts from such occurrences of flooding.
4. ***Analyze impacts to coastal resources considering sea level rise:*** Analyze and address how the project may impact coastal resources such as public access and recreation, water quality, coastal habitats, and visual resources over time, given the influence of sea level rise. Consider in particular how coastal resources like wetlands or sandy beaches could be narrowed or lost if the proposed development will limit their natural migration, as well as how existing or planned future adaptation strategies such as elevation could impact visual and/or other coastal resources.
5. ***Identify project alternatives, as necessary:*** Identify and describe project alternatives that avoid resource impacts and minimize risks to the project. Alternatives may include, for example, larger setbacks, building a smaller structure in an unconstrained portion of the site, elevating the structure, or providing options that would allow for incremental or total removal of the structure if and when it is impacted in the future. Include an assessment of any sea level rise adaptation measures that may be implemented in the future, such as relocation or removal if and when the development is threatened by coastal hazards.

[Quoted text hidden]

Reznik, Benjamin M. <BMR@jimb.com>

To: Juliet Oh <juliet.oh@lacity.org>, "Brower, Neil" <nbd@jimb.com>

Cc: Debbie Lawrence <debbie.lawrence@lacity.org>, Iris Wan <iris.wan@lacity.org>, "faisal.roble@lacity.org" <faisal.roble@lacity.org>

Sun, Nov 19, 2017 at 11:25 AM

Juliet, can you point us to another project that completed a Sea Level Rise study so we can see what it entails? This policy you mention was adopted by CCC back on Aug. 12, 2015. So I assume there must be other such studies you have we can review. Thank you. Ben

From: Juliet Oh [mailto:juliet.oh@lacity.org]

Sent: Wednesday, November 08, 2017 11:52 AM

EXHIBIT E



The screenshot shows a web-based flood mapping application. The main map displays a coastal area with a pink overlay indicating flood zones. Labels on the map include "Playa Del Rey", "Del Rey", "Park Playa del Rey", "St. Barn", "Catal", and "Hob St". The application interface includes a control panel on the right with the following sections:

- 4) Choose Shoreline Change**: Includes a dropdown menu for "What are Storm Scenarios?", a "King Tide" button, and a "SF Boy King Tide Scenario" label.
- 3) Choose an Event**: Includes a "Choose Storm Scenario Frequency" section with buttons for "None", "Annual", "20 year", and "100 year".
- 2) Choose an Amount of Sea Level Rise (ft.)**: Includes a "What Sea Level Rise scenario should I use?" section with a table of values.
- Flood Potential**: Includes a "Flood Potential" button and a "Duration" dropdown menu.

The toolbar at the bottom of the map area includes icons for "Pan", "Zoom", "Draw", "Report", "GIS File", "Known", "Issues", "King Tides", "Data", "Get", "Print", and "Map". A search bar is also present with the text "Enter an address or placename".

Minimum Inundation 075cm SLR + Wave 020  
 Maximum Inundation 075cm SLR + Wave 020





Detail View

4) Choose Shoreline Change

What is a King Tide scenario?  
What are Storm Scenarios?

King Tide

SF Bay King Tide Scenario

Or Choose

None Annual 20 year 100 year

Storm Scenario Frequency

Choose

3) Choose an Event

What Sea Level Rise scenario should I use?

4.9	5.7	6.6	16.4	(Use cm)	
0	0.8	1.6	2.5	3.3	4.1

Level Rise (ft.)

2) Choose an Amount of Sea Level Rise

What do the Topics represent?

Flood Potential

Current Duration

EXHIBIT F



**From:** [chankael@aim.com](mailto:chankael@aim.com) [mailto:[chankael@aim.com](mailto:chankael@aim.com)]

**Sent:** Thursday, April 09, 2015 12:38 PM

**To:** [kevin.roth@lacity.org](mailto:kevin.roth@lacity.org)

**Cc:** [tricia.keane@lacity.org](mailto:tricia.keane@lacity.org); [dpc@cbcearthlaw.com](mailto:dpc@cbcearthlaw.com); [mnb@cbcearthlaw.com](mailto:mnb@cbcearthlaw.com); [noelweiss@ca.rr.com](mailto:noelweiss@ca.rr.com); [cigardenia@aol.com](mailto:cigardenia@aol.com)

**Subject:** California Public Records Act Request-- Methane Mitigation Systems

Kevin:

Thank you for taking my call and pointing me in the right direction.

This is a formal California Public Records Act Request. The following background should assist in understanding the request.

The City of Los Angeles has adopted a Methane Mitigation Ordinance, Ordinance Number 175790. The Ordinance amended Section 91.106.4.1 and Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code (the "Municipal Code") to establish citywide methane mitigation requirements and include more current construction standards to control methane intrusion into buildings. Pursuant to Section 91.7104.2 Methane Mitigation Systems all buildings located in the Methane Zone and Methane Buffer Zone shall provide a methane mitigation system as required by Table 71 based on the appropriate Site Design Level. Table 71 was amended by Ordinance 180619 (as amended "Table 71"). Table 71 specifies, among other things, circumstances in which "dewatering" is required as part of methane mitigation.

With this preface the following documents are requested pursuant to the Public Records Act:

1. All documents pursuant to which the City of Los Angeles or its Department of Building and Safety has waived requirements for "dewatering" which would otherwise be required pursuant to Table 71.
2. All documents which evidence the standards, policies or criteria which the City of Los Angeles or its Department of Building and Safety apply in determining the adequacy of methane mitigation systems which do not provide for dewatering when dewatering would otherwise be required pursuant to Table 71.
3. All documents which evidence methane mitigation plans which the City of Los Angeles or its Department of Building and Safety, acting through the "Superintendent of Building," has approved as "an equivalent methane mitigation system" pursuant to Section 91.7104.2.
4. All documents which evidence standards, policies or criteria which the City of Los Angeles or its Department of Building and Safety, acting through the "Superintendent of Building," applies in determining a methane mitigation system which does not meet the requirements of Table 71 is an "equivalent methane mitigation system" to that required by Table 71.
5. A list of all buildings for which the City of Los Angeles or its Department of Building and Safety have allowed a building permit to be issued where the methane mitigation system does not meet the requirements specified in Table 71.
6. A list of all buildings for which the City of Los Angeles or its Department of Building and Safety have allowed a building permit to be issued where Table 71 would require "dewatering" as part of the methane mitigation system and the system in the approved methane mitigation plans does not include "dewatering."



I can be reached at 310-985-1581 if these requests require clarification. I am also willing to discuss ways to reduce the scope of these requests and still obtain the information I need, which I would confirm via a revised request. Absent such a revised request, I look forward to your response to these requests.

Kathryn M. Schwerfeger

229 Montreal Street

Playa del Rey, CA 90293

**From:** Hazel Harris <hazel.harris@lacity.org>  
**To:** chankael <chankael@aim.com>  
**Subject:** Public Records Act Request for Methane Mitigation  
**Date:** Tue, Apr 21, 2015 9:22 am  
**Attachments:** PR15-11217.pdf (69K)

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Ms. Schwertfeger,  
Attached is LADBS' response to your Public Records Act Request dated April 9, 2015, regarding Methane Mitigation System.

Hazel

--  
**Hazel Harris**  
**Management Analyst II**  
**Los Angeles Department of Building and Safety**  
**Office of the Custodian of Records**  
**201 N. Figueroa St., Room 784**  
**Los Angeles, CA 90012**  
**Mail Stop: 115**  
**(213) 482-6765 Office**  
**(213) 482-6889 Fax**



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April 21, 2015

PR15-11217

Kathryn M. Schwertfeger  
229 Montreal Street  
Playa del Rey, CA 90293

**{Sent via e-mail to [chankael@aim.com](mailto:chankael@aim.com) on April 21, 2015}**

Re: Public Records Act Request dated April 9, 2015, regarding Methane Mitigation System

Ms. Schwertfeger:

This letter is in response to your Public Records Act Request, dated April 9, 2015, addressed to, Kevin Roth, Sr. Clerk Typist, Los Angeles Department of Building and Safety (LADBS). In your letter you requested documents pertaining to Methane Mitigation System.

Please refer to LADBS website <http://ladbs.org/LADBSWeb/methane.jsf> for information regarding Methane Mitigation System. LADBS records are maintained by property address, not specific planned areas. Therefore, LADBS is unable to conduct a search for records in response to your request.

Please feel free to contact me at (213) 482-6765 if I can be of further assistance.

Hazel Harris  
Office of the Custodian of Records

K:\PRA Public Records Request\2015\PR15-11217





EXHIBIT G



June 9, 2018

FROM:

Adam Haussman  
404 Culver Blvd Unit 5  
Playa Del Rey CA 90293

TO:

City Planning Commission  
200 North Spring Street  
Los Angeles, California 90012

CC:

Tricia Kean (Tricia.keane@lacity.org)  
Fred Sutton (Fred.Sutton@lacity.org)  
Councilman Mike Bonin (mike.bonin@lacity.org)  
Kathryn Schwertfeger (chankael@aol.com)

RE: 138 Culver Boulevard Cases: TT-70786, ENV-2012-3536-EAF and DIR-2012-3537-CDP-DB-SPR-MEL

Thank you in advance for collecting feedback from your community regarding 138 Culver Boulevard cases TT-70786, ENV-2012-3536-EAF and DIR-2012-3537-CDP-DB-SPR-MEL. As someone who has worked on the plumbing side of the construction industry for over 18 years, I am an advocate daily for smart development throughout Los Angeles and Southern California. I originally wrote to the City on September 14, 2014 to voice my concerns over environmental conditions and site conditions that were being taken for granted. I am writing today to renew my concerns, as the project has failed to adequately address those concerns.

My understanding is that the underlying case documents and reports are being submitted into the record in one coordinated folio with bates numbers in the lower left hand corner. References to LEG in my letter are to that bates stamped record so you can easily find the materials to which I am referencing. I have reviewed the IS/MND issued by the City, the Technical Data Memorandum of Kimley Horn dated December 9, 2014 LEG 920-929, the Project Plans which are Exhibit A to the Director's Determination dated February 5, 2018, and the Geotechnical Investigation of Geocon West, Inc. dated December 9, 2009 (the "Geocon Report") and responses to Los Angeles Department of Building and Safety comments LEG 946-1078, as supplement by materials filed subsequent to March 2015.

The continued presence of a subterranean parking garage demonstrates that the project does not take seriously the risk of flooding damage to the streets, parking lots and businesses of Playa Del Rey. The parking garage removes 14-16 feet of soil from downtown Playa Del Rey, which already experiences flooding during 1-2 inches of rainfall. The pictures at LEG 735-754 and my personal experience as a resident leave no doubt as to the pre-project flooding state. Displacement remains an issue, regardless of the number of subterranean parking levels. The water must go somewhere – and the soil that collected the water is now missing. The nearly one acre of pervious surface which used to exist at the project site has been rendered impervious. All this will enhance flooding in what is already a very flood challenged community.



The logical destination for the water remains the street. There are only two storm water catch basins at this location – one on Culver Blvd and one on Vista Del Mar. Rainfall of 1-2 inches has overwhelmed both catch basins in the past. Addressing flooding issues is a priority for Playa Del Rey. On January 16, 2018 representatives from the County Public Works Department met with residents of Playa Del Rey to discuss plans to mitigate flooding on the corner of Culver Blvd and Trolleyway. For now, the plan appears to be trying to maintain the drain lines open by periodic sand removal. But one can only expect that at some point the drain lines will again be inadequate as they were during the floods documented at LEG 734-754. Water displacement due to soil removal for this project will further undermine our storm water collection abilities, and directly undermine the plans of Playa Del Rey and the county to mitigate flooding.

Another issue is water run-off from the building itself, which will be directed into the storm water catch basins. This concern was brought to the developer's attention in a Preliminary Storm Water Analysis memo drafted by the agency Kimley Horn on December 9, 2014. In the memo, Kimley Horn recommended a rain water harvesting system capable of holding 2, 124 CF of water to help mitigate the impact of storm water building run-off. A rain water harvesting system is not a comprehensive solution to the issue of building run-off. That said the architectural drawings from February 5, 2018 show no indication of the installation of a rain water harvesting system on the roof top of the project or an adequate tank anywhere else at the project. It is very disappointing that the project did not follow the recommendation of the Preliminary Storm Water Analysis memo and is not complying with the mitigation the project's own consultant found to be necessary to reach the conclusion that the building would not increase flooding in lower Playa del Rey by increasing impermeable surface area. This demonstrates once again that the project does not regard flooding in downtown Playa Del Rey as a concern.

Even assuming the rain water harvesting system is a real mitigation, presumably because the City imposes a condition requiring the same, the Kimley Horn Memorandum needs to make some counterfactual assumptions to reach the conclusion that the project would not exacerbate flooding in lower Playa del Rey.

First, the memo assumed 14% of the project will be pervious for calculation purposes. LEG 925. Geoccon West's Geotechnical Investigation, however, specifically states that infiltration is not feasible at the site and required collection of water and drainage to the street. "8.25.1 Proper surface drainage is critical to the future performance of the surface improvements. Uncontrolled infiltration of irrigation excess and storm runoff into the supporting soils can adversely affect the performance of the planned improvements. Saturation of supporting soils can cause it to lose internal shear strength and increase compressibility, resulting in a change in the original design properties. . . 8.25.2 All site drainage should be collected and transferred to the street. . . ." LEG 981.

Second, the Kimley Horn report admits that flooding could be occurring "due to events outside the projects[sic] control." In other words, the mathematical assumptions used by the memorandum might be disrupted by the reality of lower Playa del Rey, resulting in flooding exacerbated by the project. The conditions listed by the Kimley Horn memorandum included downstream storm system clogging, sea level rise and the County Storm Drain System not able to accommodate unusually high (100-Yr or over) storm event." The first two, events are the status quo in lower Playa del Rey. The County has a plan to prevent clogging in the storm drain pipe but we have no indication that the chronic clogging the residents have told the City about at prior hearings, the clogging which produced two floods in one

To City Planning Commission  
June 9, 2018  
Page 3

month in lower Playa del Rey immediately prior to the first round of hearings will not recur. The County's dredging efforts will not be, as they historically have not been, perfectly timed to ensure the drain pipe is clear for every storm event. Kimley Horn also lists Sea Level rise as a factor excluded from their report as not under the project's control. And, last I checked we are not living in climate change denial in California. Sea level rise is a fact and should be assumed for the life of the project in any analysis which attempts to demonstrate there will not be extreme flooding in lower Playa del Rey, to which the project will contribute.

There is also the issue of storm water collecting in the subterranean parking garage, and how the project intends to remove the water from the garage. The plans indicate that two small mechanical rooms will be in the parking garage. Neither room appears to be sized adequately to house the pump station needed to remove storm water from that section of the parking garage. Regardless, the plans do not indicate that storm water storage tanks will be installed on site to collect storm water from the parking garage. If the plan is to remove storm water from the garage by pumping it into the storm water catch basins, then the project is undermining our storm water collection abilities in yet another way.

**Combined – the water displacement, the building run-off, the garage storm water - the inevitable outcome is water collecting in the streets, parking lots and businesses of downtown Playa Del Rey. Los Angeles taxpayers will be accountable for the costs of repairing the damage to Playa Del Rey.**

It is critical to remind everyone that this project was not required to file an Environmental Impact Report; as a result, the risk of excavating this site has not been properly vetted. This site previously featured a gasoline station; a study of the soil would seem to be a logical investment, yet no such study was conducted. Studying the soil would have also given us an understanding of the impact of the excavation on the surrounding infrastructure. **We do not know how drilling at this location will affect the water main, sewer piping, and natural gas piping – much of which has been installed for decades. In addition, the construction phase of the Venice Dual Force Main Project has begun in Playa Del Rey. The microtunneling runs directly adjacent to the project site.** Jeopardizing the brand-new Venice Dual Force Main Project by excavating a site that has not been properly vetted seems a completely reckless course of action.

Thank you again for collecting feedback from your community regarding 138 Culver Boulevard cases TT-70786, ZA-2014-2220-CDP, ENV-2012-3536-EAF and DIR-2012-3537-DB-SPR-MEL. We appreciate your thoughtful and impartial deliberations regarding this project.

Adam Haussman  
404 Culver Blvd Unit 5  
Playa Del Rey CA 90293

