

DEPARTMENT OF CITY PLANNING  
RECOMMENDATION REPORT



**West Los Angeles  
Area Planning Commission**

**Date:** March 15, 2017  
**Time:** After 4:30 p.m.  
**Place:** Henry Medina West Los Angeles  
Parking Enforcement Facility  
11214 W. Exposition Boulevard  
2<sup>nd</sup> Floor Roll Call Room  
Los Angeles, CA 90064

**Case No.:** ZA-2014-3186-CDP-SPP-MEL-1A  
**CEQA No.:** ENV-2014-3187-CE  
**Related Case:** none  
**Council No.:** 11- Bonin  
**Plan Area:** Venice  
**Specific Plan:** Venice Coastal Zone; Los Angeles Coastal Transportation Corridor  
**Subarea:** n/a  
**GPLU:** Limited Industrial  
**Zone:** M1-1

**Public Hearing:** May 19, 2016  
**Appeal Status:** Not further appealable pursuant to LAMC Section 12.20.2

**PROJECT**

**LOCATION:** 2100-2106 South Narcisus Court; legally described as Tract 60, Lot 69

**ITEM:**

Appeal of the entire decision of the Zoning Administrator approving a Coastal Development Permit pursuant to Los Angeles Municipal Code (LAMC) Section 12.20.2 authorizing the demolition of an existing single-family dwelling and the construction of a new, 29-foot 6-inch tall, two-story, 3,491 square-foot industrial building located within the single permit jurisdiction of the California Coastal Zone, and a Specific Plan Project Permit Compliance pursuant to Code Section 11.5.7, and Pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, a Mello Act Compliance Review for the demolition of an existing single-family dwelling in the Coastal Zone.

**APPLICANT:** Tom Stennock, Planning Associates, Inc.

**APPELLANTS:** Bill Przulucki, People Organized for Westside Renewal

**REQUESTED**

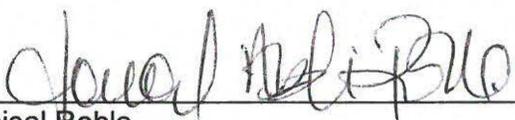
**ACTION:** Appeal of the Zoning Administrator's decision to approve a Coastal Development Permit, a Project Permit Compliance, and a Mello Act Compliance Review.

**RECOMMENDED ACTIONS:**

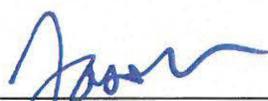
1. Deny the Appeal.

2. **Sustain** the Determination of the Zoning Administrator in approving a Coastal Development Permit pursuant to Los Angeles Municipal Code (LAMC) Section 12.20.2 authorizing the demolition of an existing single-family dwelling and the construction of a new, 29-foot 6-inch tall, 3,491 square-foot industrial building located within the single permit jurisdiction of the California Coastal Zone on two lots totaling 5,417 square feet within the M1-1 zone, and a Specific Plan Project Permit Compliance pursuant to Code Section 11.5.7, and Pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, a Mello Act Compliance Review for the demolition of an existing single-family dwelling in the Coastal Zone.
3. **Find** that the project is Categorical Exempt pursuant to Article III, Section 1, and Class 3 (New Construction of Small Structures), Category 1 of the City of Los Angeles CEQA Guidelines. A Categorical Exemption, ENV-2014-3187-CE, was filed pursuant to the California Environmental Quality Act (CEQA) and Section 21082.1(c)(3) of the California Public Resources Code.
4. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP  
Director of Planning

  
\_\_\_\_\_  
Faisal Roble  
Principal City Planner

  
\_\_\_\_\_  
Debbie Lawrence, AICP  
Senior City Planner

  
\_\_\_\_\_  
Jason Chan  
City Planner (213) 978-1310

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**Exhibits:**

- Exhibit A: Appeal, ZA-2014-3186-CDP-SPP-MEL-1A
- Exhibit B: Zoning Administrator's Determination, ZA-2014-3186-CDP-SPP-MEL
- Exhibit C: Project Plans (Exhibit A of Zoning Administrator's Determination)
- Exhibit D: Site Photographs

**ADVICE TO PUBLIC:** \* The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 532, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300)*. While all written communications are given to the Commission for consideration, the initial packets are sent to the Commission's Office a week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to the agency at or prior to the public hearing. As a covered entity under Title II of the American Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

## PROJECT ANALYSIS

### APPELLATE DECISION BODY

Pursuant to Section 12.20.2 of the Los Angeles Municipal Code (LAMC), appeals of Coastal Development Permit cases are heard by the Area Planning Commission. The appellate decision of the Area Planning Commission is final and effective as provided in Charter Section 245.

### PROJECT SUMMARY

On September 28, 2016, the Zoning Administrator approved a Coastal Development, Project Permit Compliance, and Mello Compliance case for a project involving the demolition of an existing single-family dwelling and the construction of a new, 29-foot 6-inch tall, 3,491 square-foot industrial building with eleven off-street parking spaces located, as well as 12 short-term and long-term bike parking spaces. The bicycle parking will replace 2-parking spaces in order to satisfy requirements for 13 parking spaces. The site is within the single permit jurisdiction of the California Coastal Zone in the M1-1 Zone within the single permit jurisdiction of the California Coastal Zone, on two lots totaling 5,417 square feet of lot area.

### PROJECT BACKGROUND

The Subject Property is zoned M1-1, designated for Limited Industrial land uses, and is subject to the Venice Coastal Zone Specific Plan Area, Los Angeles Transportation Corridor Specific Plan Area, Director's Interpretation of the Venice SP for Small Lot Subdivision (ZI-2406), and General Plan Footnote(s) area. It is located within Calvo Exclusion Area Coastal Zone, Coastal Zone Commission Authority, liquefaction area, and within 5.43 kilometers to the Santa Monica Fault.

The subject property is a relatively level, irregular-shaped, inner parcel of land comprised of two adjacent lots totaling approximately 5,417 square-feet. The subject property has an approximate 108.94-foot frontage along the southwestern side of Narcisus Court, an approximate depth of 110.03-feet to the east, an approximate depth of 77.40-feet to the west and an approximate width of 30.75 feet to the south. The property is currently developed with a one-story, vacant single-family dwelling built between 1900-1923 but relocated to the subject site in 1923, which is to be demolished. A historical resources report and the Department of City Planning's Office of Historic Resources found that subject property does not appear potentially eligible, either individually or as a contributing member of potential district, under any of the applicable federal, state, or local eligibility criteria.

Properties to the north, east, south, and west are zoned M1-1 and M1-1-O and are developed with primarily one- and two-story light industrial buildings. Immediately to the north and west of the project site is a City of Los Angeles maintenance yard facility that includes a compressed natural gas refueling station. Properties immediately located to the south and east of the Subject Properties is developed with a series of nine, two-story, live-work units.

### Public Hearing

A public hearing was held on May 19, 2016 at the West Los Angeles Municipal Building. The owner/applicant, project representative, and community members were in attendance. Five members of the community provided testimony for the project and stated their support for a street waiver for the project and expressed some concerns regarding construction impacts that would be caused by the proposed project. Further concerns were raised about construction impacts the proposed project would cause as the same applicant has a similar project approximately 530 feet

away to the east at 519-521 West Boccacio Avenue under Case No. ZA-2014-3182-CDP-SPP-MEL-1A. However, the speakers recommended temporary construction conditions, such as staggering construction schedules for both projects and providing a shuttle service for construction workers, to minimize impacts of the project on the surrounding community.

At the conclusion of the hearing, the Hearing Officer took no action and left the case under advisement.

### Correspondence

On August 16, 2016 the Venice Neighborhood voted to recommend approval of the proposed project, with two operating conditions regarding parking for employees, if the Area Planning Commission approves the project's Mello Feasibility Study.

On July 28, 2016 a letter was submitted by People Organized for Westside Renewal (POWER) stating that, per Mello Act guidelines, the applicant has been unable to prove that a residential use is not feasible at the project site, regardless of the existing conditions, underlying zone, or existence of non-conforming uses.

### **APPEAL POINTS & STAFF RESPONSE**

One appeal was filed in a timely manner on October 11, 2016 by the appellant, as defined by LAMC Section 12.20.2 and the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act.

The appellant argues the following appeal points:

Appeal Point No. 1 – *Mello Act compliance was not completed properly, as the Zoning Administrator does not have the authority to make a determination that a residential project is no longer feasible, nor can the Zoning Administrator review a feasibility study to determine infeasibility, as such determination shifts the burden of proof away from the applicant, in violation of the Mello Act.*

Part 4.1 through 4.3 of the City's Interim Administrative Procedures (IAP), outline the procedures for reviewing projects that propose the demolition or conversion of residential structures for non-residential uses. The appellant argues that the Zoning Administrator does not have the authority to determine that a residential project is no longer feasible. This is not the case. Part 4.3 of the IAP allows the applicant to submit substantial evidence to the decision-maker (for Discretionary Applications) to determine if a residential use is feasible, as part of the Mello Act Compliance Review. A Discretionary Application is defined in the Settlement Agreement and IAP as "the original application for...a coastal development permit...or any other action that first requires the discretionary approval of the Director of Planning, the City Planning Commission, the Zoning Administrator, the Advisory Agency, or an Area Planning Commission." As such, the initial decision-maker for the requested planning entitlements was the Zoning Administrator. As discussed in the responses below, substantial evidence was submitted to prove that it is not feasible to maintain a residential use on the property. The appellant incorrectly asserts that the Area Planning Commission is the initial decision-maker for the Mello Act Compliance Review and that the applicant must appeal a decision to argue that a residential use is not feasible. Part 4.3 of the IAP provides the following instructions to staff and the decision-maker:

- "If the Applicant has proved with substantial evidence that a residential use is infeasible, staff shall record a 'no' answer to question #3, and go to question #4."

- "if the Applicant has not proved with substantial evidence that a residential use is infeasible, staff shall record a 'yes' answer to question #3. This stops the Mello Act Compliance Review Process. The Discretionary or Non-Discretionary Application shall be denied. A determination shall be issued pursuant to Part 6.0"

A Mello Act Compliance Review and Determination was issued pursuant to Part 6.0 of the IAP. As outlined in Part 8.0, the Determination may be appealed, furthermore, "Appellants have the burden of proof and shall present substantial evidence to support their appeal."

The Zoning Administrator carefully reviewed all information regarding the feasibility of the site for residential uses. Based on the substantial evidence submitted in the feasibility study, it was determined that residential uses are not feasible based on a combination of technical, social, and environmental factors. The Zoning Administrator did not err in approving a Coastal Development Permit, Project Permit Compliance Review, and Mello Act Compliance Review.

Appeal Point No. 2 – *The project's feasibility study does not sufficiently demonstrate that a residential use is not feasible on site. The Appellant cites the following provisions of the IAP:*

*If the existing underlying zoning or any other applicable regulation prohibits all residential uses, then the Applicant may cite those facts if the Applicant is challenging the City's presumption. If an Applicant has non-conforming or other rights which permit a continued residential use, then the Applicant may not contend that the existing zoning renders a residential use infeasible.*

*An Applicant may not claim financial feasibility unless it can clearly document an inability to rent or sell the current premises based on the site's unique characteristics or circumstances. Unique characteristics or circumstances include proximity to noxious and incompatible existing uses that are likely to remain, and that render a continued residential use infeasible. If challenging the City's presumption, an Applicant may not cite mere proximity to commercial or industrial uses.*

*An Applicant may not claim infeasibility because the current premises are dilapidated or are in a state of disrepair due to the Applicant's failure to make reasonable repairs or adequately maintain the site. The City may require the Applicant to correct substandard conditions before it will further consider an Applicant's challenge of the City's presumption.*

According to Part 4.3 of the IAP, which is the City's implementation of the State's Mello Act, the City must presume that a residential use is feasible, because the site contains an existing residential structure. However, Part 4.3 further states the applicant has the burden of proof to challenge the City's presumption. This challenge can be conducted via Section(s) 4.1, 4.2, 4.3, and 4.4 of the IAP. *Feasible*, as defined by the Mello Act, is described as capable of being accomplished by taking into account economic, environmental, social, and technical factors. A feasibility study completed by the applicant found that a residential use is infeasible due to these factors, with emphasis on the technical factor; notably, the continued operation of a non-conforming land use. The project site is located on a 5,417 square foot site that is zoned M1-1 and designated for Limited Industrial land uses. Residential uses are not permitted in the M1 zone. The existing dwelling was constructed and relocated to the subject site during a time before the City had a comprehensive Zoning Code, and the zoning of the lot has changed since its original construction date.

The study was based on documentation from the Department of Building and Safety (LADBS) and the Housing and Community Investment Department (HCID). On February 11, 2016 the LADBS reviewed the project and determined that the existing dwelling no longer had non-

conforming rights per LAMC Section 12.23-B,9 to continue a residential use on industrial land. According to this Code Section, *"A building or structure or portion of a building or structure, which contains a nonconforming use which is discontinued for a continuous period of one year, shall only be occupied by a use that conforms to the current use regulations of the zone and other applicable current land use regulations."*

LADBS found that the dwelling has not been used since April 2011 based on documentation provided by the applicant from the previous owner; therefore since the use has been discontinued for over one year, the non-conforming rights to continue a residential use on-site was lost. On July 19, 2016 the HCID issued a Mello Act Determination for subject site, and found that no affordable units exists on-site as the dwelling has been vacant for over 365 consecutive days.

Beyond technical factors, the feasibility study also emphasizes that environmental factors make the project infeasible because of the underlying zone. Because non-conforming land use rights have been lost and the M1 zone does not allow by-right residential uses, re-establishing residential uses could result in a significant environmental impact since that would conflict with an established land use policy. According to the City of Los Angeles CEQA Thresholds Guide, Section H.1: Land Use Consistency, a screening criteria question for projects to determine appropriate CEQA review, asks, *"Is the project inconsistent with the General Plan or its elements, or an applicable specific plan, local coastal plan, redevelopment plan, interim control ordinance or adopted environmental goals or policies?"* Since the re-establishment of residential is not consistent with the General Plan or Zoning Code, further environmental review is required.

The non-conforming use prohibits the applicant from obtaining building permits to renovate or remodel the existing dwelling, as plan checkers would have to verify existing conditions and occupancy before any permit issuance. The applicant and LADBS provided sufficient proof of infeasibility through technical, environmental, and other factors, therefore satisfying the provisions of the IAP.

## **CONCLUSION**

Staff recommends denial of the appeal, and approval of the Zoning Administrator's Determination for the Coastal Development Permit, Project Permit Compliance, and Mello Compliance authorizing the demolition of an existing single-family dwelling and the construction of a new, 29-foot 6-inch tall, 3,491 square-foot industrial building on a 5,417 square foot site located within the single permit jurisdiction of the California Coastal Zone.

Upon in-depth review and analysis of the issues raised by the Appellant for the proposed project, no errors or abuse of discretion by the Zoning Administrator were found in regards to the appeal points raised. Part 8.0 of the IAP states that in appeals of the City's Mello Act Compliance Review Determination, the Appellant has the burden of proof and shall present substantial evidence to support their appeal. Substantial evidence has not been provided to support the appeal of the Zoning Administrator's approval of the Coastal Development, Project Permit Compliance, and Mello Act Compliance Review.



**4. JUSTIFICATION/REASON FOR APPEAL**

Is the entire decision, or only parts of it being appealed?  Entire  Part

Are specific conditions of approval being appealed?  Yes  No

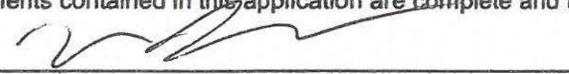
If Yes, list the condition number(s) here: 7

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

**5. APPLICANT'S AFFIDAVIT**

I certify that the statements contained in this application are complete and true:

Appellant Signature: 

Date: 10/03/2016

**6. FILING REQUIREMENTS/ADDITIONAL INFORMATION**

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee: <u>\$ 89.00</u>	Reviewed & Accepted by (DSC Planner): <u>Gracida Acosta</u>	Date: <u>10/11/16</u>
Receipt No: <u>0103643458</u>	Deemed Complete by (Project Planner):	Date:
<input type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)



Appeal to the West Los Angeles Area Planning Commission of:

**CASE NO. ZA 2014-3186(CDP)(SPP)(MEL)**

**2100-2106 Narcisus Court**

**Justification**

The Interim Administrative Procedures (IAP) that the City of LA has adopted to enforce the state Mello Act (Gov't Code §65590-65590.1) lays out the standards to determine whether a residential unit is no longer feasible on a site within the Coastal Zone, as the Mello Act generally prohibits the conversion of a residential use to a non-residential use within the coastal zone. Those standards have not been met here. The Zoning Administrator erred in two ways when approving the CDP and Mello Act Compliance Determination for the project at 2100-2106 Narcisus Court.

**Improper process for implementing the Mello Act:**

First, the Zoning Administrator does not have the authority to make a ruling that a residential project is no longer feasible at the site; nor can the ZA accept and review a feasibility study by the applicant attempting to demonstrate that a residential project is infeasible. Doing so shifts the burden of proof from the applicant to the appellant (i.e. the Community), which violates the Mello Act.

**From the IAP:**

**4.3 QUESTION #3. IS A RESIDENTIAL USE FEASIBLE AT THIS LOCATION?**

Because the site contains a residential structure, the City presumes that a residential use is feasible. The Applicant may challenge the City's presumption by presenting substantial evidence to the contrary directly to DCP/ZAD staff (for Non-Discretionary Applications); and to the decision-maker (for Discretionary Applications).

The following shall be considered in reviewing an Applicant's challenge of the City's presumption:

**The Applicant has the burden of proof. Proximity to other existing, viable residential uses is strong evidence that a residential use is feasible.**

The site previously contained a residential structure. The City must presume that a residential use is feasible.

The application is clearly discretionary, and therefore in order to refute this presumption, the applicant must present "substantial evidence" not to the DCP/ZAD staff, but to the "decision-maker." In this case, the decision-maker (the final arbiter on the case) is the West Los Angeles Area Planning Commission (WLA-APC).





The appropriate action for the Zoning Administrator would have been to make a Mello Finding that a residential use was feasible and the CDP would violate the IAP for converting a residential to a non-residential use within the coastal zone. The applicant could then have appealed that finding to the WLA-APC.

Following the proper procedure would have also maintained the burden of proof being on the applicant, which is required in the IAP. This was not done, so we are in the bizarre situation of proving the very thing that is supposed to be the city's presumption in the first place. We are forced to appeal that the Zoning Administrator erred when approving the project design described in this CDP, when really the applicant has the burden of proving that a residential use is infeasible in any conceivable configuration of the project.

Appeals to the WLA-APC are costly and time consuming for members of the community and nonprofit organizations that work with them. These costs are increased because the Department of City Planning has continually resisted requests to email Mello Act determinations to those parties who are bound by the settlement agreement to receive them. In some cases even those parties do not receive them. Mello Act determinations are also generally not publicly available. There is no email list-serve for Mello Act determinations (another request the community has made many times), and they are not available through the Department of City Planning's website during the appeal window. This means community members and organizations typically have less time to complete an appeal than even the 10-day window that begins upon the department's mailing of the determination.

For all of these reasons, the Zoning Administrator erred by approving the CDP and Mello Determination instead of making the appropriate finding that a residential use is presumed feasible and allowing the applicant to appeal.

**The Zoning Administrator accepted and approved a feasibility study that did not sufficiently demonstrate that a residential use is not feasible on the site.**

The Zoning Administrator erred in their review of the applicant's feasibility study. The applicant has not sufficiently demonstrated that a residential project is no longer feasible at the site. Some of the findings used to justify the approval of the CDP and MEL Compliance are prohibited by the IAP.

From the same section of the IAP, 4.3:

- If the existing, underlying zoning or any other applicable regulation prohibits all residential uses, then the Applicant may cite those facts if the Applicant is challenging the City's presumption. If an Applicant has non-conforming or other rights which permit a continued residential use, then the Applicant may not contend that the existing zoning renders a residential use infeasible.

*The site did have non-conforming rights for a residential use on the site, and therefore may not cite the underlying zoning.*





An Applicant may not claim financial infeasibility unless it can clearly document an inability to rent or sell the current premises based on the site's unique characteristics or circumstances. Unique characteristics or circumstances include proximity to noxious and incompatible existing uses that are likely to remain, and that render a continued residential use infeasible. If challenging the City's presumption, an Applicant may not cite mere proximity to commercial or industrial uses.

*While the applicant has not cited these issues specifically, we want to clarify that the "unique characteristics" of the site do not include its zoning, its current state of repair, or changes in occupancy permits that the applicant themselves instigated.*

An Applicant may not claim infeasibility because the current premises are dilapidated or are in a state of disrepair due to the Applicant's failure to make reasonable repairs or to adequately maintain the site. The City may require the Applicant to correct substandard conditions before it will further consider an Applicant's challenge of the City's presumption.

*The applicant allowed the site to become dilapidated, and then used the fact of the dilapidation and uninhabitability of the site as a justification to lose their nonconforming rights for a residential use. The Department of Building and Safety should never have revoked those rights, but instead mandated repairs to the site to preserve a residential use within the Coastal Zone.*

If the Applicant has proved with substantial evidence that a residential use is infeasible, staff shall record a "no" answer to question #3, and go to question #4.

If the Applicant has not proved with substantial evidence that a residential use is infeasible, staff shall record a "yes" answer to question #3. This stops the Mello Act Compliance Review process. The Discretionary or Non-Discretionary Application shall be denied. A determination shall be issued pursuant to Part 6.0.

Based on the information we have, we do not believe that the applicant has, or will be able to, demonstrate that a residential use is not feasible. Per the IAP, they may not cite things such as: Dilapidated conditions, underlying zoning, or the existence of non-conforming uses.

The purpose of the Mello Act is to create and preserve affordable housing within the Coastal Zone, and to preserve all residential housing within the Coastal Zone.

The spirit as well as the letter of the Coastal Zone requires that the Zoning Administrator's approval of the CDP and Mello Determination be reversed. An appeal by the applicant of a Zoning Administrator's determination to preserve a residential use within the Coastal Zone would allow us to better examine if there is, in fact, no conceivable way to maintain a residential use and take the extreme step of reducing the Coastal Zone's overall housing stock due to the very unique circumstances in which the Mello Act allows this.



**EXHIBIT B**

**CITY OF LOS ANGELES**  
CALIFORNIA

ZONING ADMINISTRATOR'S  
DETERMINATION  
ZA-2014-3186-CDP-SPP-MEL

**LYNN K. WYATT**  
CHIEF ZONING ADMINISTRATOR  
  
**ASSOCIATE ZONING ADMINISTRATORS**  
JACK CHIANG  
HENRY CHU  
LOURDES GREEN  
ALETA D. JAMES  
CHARLES J. RAUSCH, JR.  
FERNANDO TOVAR  
DAVID S. WEINTRAUB  
MAYA E. ZAITZEVSKY



**ERIC GARCETTI**  
MAYOR

**OFFICE OF  
ZONING ADMINISTRATION**  
200 N. SPRING STREET, 7<sup>TH</sup> FLOOR  
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(213) 978-1318  
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September 28, 2016

Michael Chait (A)  
Chait Co.  
7306 Coldwater Canyon #12  
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MBL Narcisus, LLC (O)  
C/O MBL Properties Inc.  
2550 South Overland Avenue  
Los Angeles, CA 90064

Tom Stemnock (R)  
Planning Associates Inc.  
4040 Vineland Avenue, Suite 108  
Studio City, CA 91604

CASE NO. ZA 2014-3186(CDP)(SPP)(MEL)  
COASTAL DEVELOPMENT PERMIT/  
SPECIFIC PLAN PROJECT PERMIT  
COMPLIANCE  
2100-2106 Narcisus Court  
Venice Planning Area  
Zone : M1-1  
D. M. : 108B145  
C. D. : 11  
CEQA : ENV 2014-3187-CE  
Legal Description: Lot 69, Tract 60

Pursuant to Los Angeles Municipal Code Section 12.20.2, I hereby APPROVE:

a Coastal Development Permit authorizing the demolition of an existing single-family dwelling and the construction, use and maintenance of a new industrial building located within the single permit jurisdiction of the California Coastal Zone, and

Pursuant to Los Angeles Municipal Code Section 11.5.7, I hereby APPROVE:

a Specific Plan Project Permit Compliance for the proposed project which is located within the Venice Coastal Zone Specific Plan area, and

Pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, I hereby APPROVE:

a Mello Act Compliance Determination for the demolition and construction of a single-family dwelling in the Coastal Zone.

upon the following additional terms and conditions:

1. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
2. The use and development of the property shall be in substantial conformance with the plot plan submitted with the application and marked Exhibit "A", except as may be revised as a result of this action.
3. The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective Conditions, if, in the Administrator's opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
4. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
5. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
6. Prior to the issuance of any permits relative to this matter, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Zoning Administrator for attachment to the subject case file. Prior to any sign-off of plans by the Department of City Planning, the applicant shall submit the plot plan for review and approval to the Fire Department. Said Department's approval shall be included in the form of a stamp on the plans submitted to the Department of City Planning Public Counter at the Development Services Center.
7. Approved herein is a Coastal Development Permit authorizing the construction of a new, two-story, 3,491 square-foot industrial building, an 88-square-foot deck, and eleven (11) tandem, mechanically-stacked, on-site automobile parking spaces.
8. The height of the industrial building shall be limited to two stories with a varied roofline and a maximum height of 29 feet 6 inches.
9. Parking shall be provided in compliance with the Municipal Code and to the satisfaction of the Department of Building and Safety. No variance from the parking requirements has been requested or granted herein.
10. No deviations from the Venice Coastal Specific Plan have been requested or

approved herein. All applicable provisions of the Specific Plan shall be complied with.

11. Unless authorized for shared parking pursuant to Section 12.24-X,20 of the Municipal Code, the parking lot shall not be used, rented or leased for any other purpose than the parking of vehicles for the premises on the subject property.
12. Prior to the commencement of site excavation and construction activities, construction schedule and contact information for any inquiries regarding construction activities shall be provided to residents and property owners within a 100-foot radius of the project site. The contact information shall include a construction manager and a telephone number, and shall be posted on the site in a manner, which is readily visible to any interested party.
13. No Coastal Development Permit Condition clearance or Building Permit sign-offs shall be commenced prior to the completion of the California Coastal Commission permit issuance and the subsequent permit appeal period in Dual Jurisdiction or the completion of the 20-day review period of the City's Coastal Development Permit in Single Jurisdiction.
14. Outdoor lighting shall be designed and installed with shielding, so that the light does not overflow into adjacent properties.
15. The applicant shall file a parking area and driveway plan with the applicable District Offices of the Bureau of Engineering and the Department of Transportation for review and approval prior to the issuance of a building permit. The plan shall be prepared consistent with the Department of Transportation's Driveway Design Manual and applicable provisions of Section 12.21 of the Municipal Code.
16. Loading and unloading activities shall not interfere with traffic on any public street. Public sidewalks, alleys and/or other public ways shall not be used for the parking or loading or unloading of vehicles. The location of loading areas shall be clearly identified on the final development plans to the satisfaction of the Department of Building and Safety and Department of Transportation.
17. All signs shall be of an identifying or directional nature only and shall be arranged and located so as not to be a distraction to vehicular traffic. New pole signs, projecting signs, roof signs, electronic message boards, pennants, ribbons, streamers, spinners, balloons (or any similar attention-attracting devices) and flashing or animated signs are prohibited.
18. All outside trash/recycling storage bins shall be located within a gated solid wall enclosure constructed of materials to match the finished exterior of the building, and located so as not to result in noise or odor impacts on any adjacent use.
19. The property owner and on-site manager(s) shall be responsible for maintaining the entire area over their control free of litter, including any parking area used by patrons.

## 20. INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.

Applicant shall do all of the following:

- a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages and/or settlement costs.
- c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement (b).
- e. If the City determines it necessary to protect the City's interests, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action.

The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

“City” shall be defined to include the City, its agents, officers, boards, commission, committees, employees and volunteers.

“Action” shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

### **OBSERVANCE OF CONDITIONS - TIME LIMIT - LAPSE OF PRIVILEGES**

All terms and conditions of the approval shall be fulfilled before the use may be established. The instant authorization is further conditional upon the privileges being utilized within three years after the effective date of approval and, if such privileges are not utilized or substantial physical construction work is not begun within said time and carried on diligently to completion, the authorization shall terminate and become void.

### **TRANSFERABILITY**

This authorization runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent upon you to advise them regarding the conditions of this grant.

### **VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR**

Section 12.29 of the Los Angeles Municipal Code provides:

“A variance, conditional use, adjustment, public benefit or other quasi-judicial approval, or any conditional approval granted by the Director, pursuant to the authority of this chapter shall become effective upon utilization of any portion of the privilege, and the owner and applicant shall immediately comply with its Conditions. The violation of any valid Condition imposed by the Director, Zoning Administrator, Area Planning Commission, City Planning Commission or City Council in connection with the granting of any action taken pursuant to the authority of this chapter, shall constitute a violation of this chapter and shall be subject to the same penalties as any other violation of this Code.”

Every violation of this determination is punishable as a misdemeanor and shall be punishable by a fine of not more than \$2,500 or by imprisonment in the county jail for a period of not more than six months, or by both such fine and imprisonment.

### **APPEAL PERIOD - EFFECTIVE DATE**

The applicant's attention is called to the fact that this authorization is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any Condition of this grant is violated or not complied with, then this authorization shall be subject to revocation as provided in Section 12.27 of the Municipal Code. The Zoning Administrator's determination in this matter will become effective after **October 13, 2016** unless an appeal therefrom is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of the Zoning Administrator's action, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. **Forms are available on-line at <http://cityplanning.lacity.org>**. Public offices are located at:

Figueroa Plaza  
201 North Figueroa Street,  
4th Floor  
Los Angeles, CA 90012  
(213) 482-7077

Marvin Braude San Fernando  
Valley Constituent Service Center  
6262 Van Nuys Boulevard, Room 251  
Van Nuys, CA 91401  
(818) 374-5050

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 12.20.2-J of the Los Angeles Municipal Code, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

Provided no appeal has been filed by the above-noted date, a copy of the permit will be sent to the California Coastal Commission. Unless an appeal is filed with the California Coastal Commission before 20 working days have expired from the date the City's determination is deemed received by such Commission, the City's action shall be deemed final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

#### NOTICE

The applicant is further advised that subsequent contact regarding this determination must be with the Development Services Center. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting. You should advise any consultant representing you of this requirement as well.

#### FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the plans submitted therewith, and the statements made at the public hearing on May 19, 2016, all of which are by reference made a part hereof, as well as knowledge of the property and surrounding district, I find that the requirements and prerequisites for granting a coastal development permit as enumerated in Section 12.20.2 of the Municipal Code have been established by the following facts:

### **BACKGROUND**

The subject property is a relatively level, irregular-shaped, inner parcel of land comprised of two adjacent lots totaling approximately 5,405 square-feet. The subject property has an approximate 108.94-foot frontage along the southwestern side of Narcisus Court, an approximate depth of 110.03-feet to the east, an approximate depth of 77.40-feet to the west and an approximate width of 30.75 feet to the south. The property is currently developed with a one-story, vacant single-family dwelling built between 1900-1923 but relocated to the subject site in 1923, which is to be demolished.

The Subject Property is zoned M1-1 designated for Limited Industrial land uses and is subject to the Venice Coastal Zone Specific Plan Area, Los Angeles Transportation Corridor Specific Plan Area, Director's Interpretation of the Venice SP for Small Lot Subdivision (ZI-2406), General Plan Footnote(s) area, Calvo Exclusion Area Coastal Zone, Coastal Zone Commission Authority, liquefaction area, and within 5.43 kilometers to the Santa Monica Fault.

A historical resources report and the Department of City Planning's Office of Historic Resources found that subject property does not appear potentially eligible, either individually or as a contributing member of potential district, under any of the applicable federal, state, or local eligibility criteria. Detailed historical review is found under Finding No. 6.

Properties to the north, east, south, and west are zoned M1-1 and M1-1-O and are developed with primarily one- and two-story light industrial buildings. Immediately to the north and west of the project site is a City of Los Angeles maintenance yard facility that includes a compressed natural gas refueling station. Properties immediately located to the south and east of the Subject Properties is developed with a series of nine, two-story, live-work units.

Narcisus Court- adjoining the subject property to the northeast is a Local Street-Standard dedicated to a Right-of-Way Width of 60 feet and a Roadway Width of 36 feet and improved with curb, gutter, sidewalk, and asphalt.

Venezia Avenue- intersecting the subject property to the east (along Narcisus Court) is a Local Street-Standard dedicated to a Right-of-Way Width of 60 feet and a Roadway Width of 36 feet and improved with curb, gutter, sidewalk, and asphalt.

The new light industrial structure will be a workspace for software production and other related products. The building will have an approximate 88-square-foot deck and approximately 623 square-feet of landscaping around the building with a maximum height of 29 feet, 6-inches tall and a varied roofline. According to the Specific Plan, the applicant

is required to provide 13 automobile parking spaces on-site. The applicant purposes that a total of 11 off-street tandem, mechanically stacked automobile parking spaces, as well as 12 short-term and long-term bike parking spaces (will replace 2-parking spaces) will be provided to accommodate the required spaces.

The applicant is requesting a Coastal Development Permit authorizing the demolition of an existing single-family dwelling and the construction of a two-story, 3,491 square-foot industrial building sited on a 5,405 square-foot lot zoned M1-1 within the single-jurisdiction area of the California Coastal Zone. The project also requires a project permit compliance review for a new industrial structure in the Venice Coastal Zone Specific Plan and a Mello Determination.

Previous zoning related actions on the site/in the area include:

**Subject Site:**

Case No. DIR-2014-2824(DI) - On August 14, 2014, the Director of Planning approved a Director of Planning Specific Plan Interpretation that clarifies the relationship between Section 12.22.C.27 of the LAMC, established by the Small Lot Subdivision Ordinance (No. 176,354), and the Venice Coastal Zone Specific Plan. The revised Director's Interpretation is intended to: (1) prevent small lot projects from exceeding densities otherwise allowed in the Specific Plan on individual lots; (2) highlight where conflicts between the LAMC and the Venice Coastal Zone Specific Plan exist and uphold the Specific Plan regulations where applicable; and (3) outline a review process for new small lot projects in the Venice Coastal Zone Specific Plan Area which takes into account the density, parking, and setback regulations of the Specific Plan

Case No. CPC 2005-8252(CA) - On January 11, 2007, the City Planning Commission approved a code amendment affecting areas within the Venice Community Plan and an ordinance establishing permanent regulations implementing the Mello Act in the Coastal Zone.

Case No. CPC 2000-4046(CA) - On May 23, 2001, the City Planning Commission approved a code amendment affecting areas within the Venice Community Plan.

Case No. CPC 98-0119(LCP) - On August 1, 2003, the City Planning Commission approved amendments to the Venice Local Coastal Program Specific Plan.

Case No. CPC 87-0648(ICO) - On April 18, 1998, the City Planning Commission approved an Interim Control Ordinance for the entire Venice Coastal Zone which will temporarily permit only building development which is in conformance with regulations substantially based on the California Coastal Commission's interpretive guidelines for the area.

**Surrounding Properties:**

Case No. ZA 2014-3182(CDP)(MEL)(SPP)- On August 27, 2014, a Case was filed requesting a Coastal Development Permit, a Mello Determination, and Project

Permit Compliance from the Venice Coastal Zone Specific Plan to allow the demolition of an existing duplex dwelling and the construction, use and maintenance of a new two-story, industrial building having 4,330 square-feet with a height of 29.5 feet. The project will have 300 square-feet of open roofed patio on the second floor, and a loading zone. With the provision of 15 bicycle space, the number of automobile parking spaces provided will be 6 located at 519 West Boccaccio Avenue. A Public Hearing is scheduled for May 19, 2016.

Case No. ZA 2010-206(CDP)(CUB)(CU)(SPP)- On January 28, 2011, the Zoning Administrator approved a Coastal Development Permit to allow the conversion, use and maintenance of retail/office space to restaurant space in the single jurisdiction of the California Coastal Zone, a Conditional Use permit to allow the sale and dispensing of beer and wine for on-site consumption within the proposed restaurant, a deviation from operating hours and tandem parking restrictions, and a Specific Plan Project Permit Compliance Review to ensure compliance with the provisions of the Venice Coastal Zone Specific Plan located at 6000 and 604 Venice Boulevard.

Case No. ZA 2009-3190(CDP)- On August 3, 2010, the Zoning Administrator approved a Coastal Development Permit to allow a change of use of an existing warehouse distributor to a manufacturing office located within the single jurisdiction of the California Coastal Zone located at 534 Victoria Avenue.

Case No. ZA 2008-1150(CDP)(SPP)(MEL)- On January 23, 2009, the Zoning Administrator approved a Coastal Development Permit authorizing the demolition of an existing single-family dwelling, conversion of an existing 1,287 square-foot light manufacturing/print shop brick building for use as retail art gallery, and construction of a new one-story building containing 1,000 square-feet of floor area also for use as a retail art gallery and 841 square-feet of floor area for administrative office use, within the single permit jurisdiction of the California Coastal Zone and a Specific Plan Project Permit Compliance for the proposed project which is located within the Venice Coastal Zone Specific Plan area located at 660 South Venice Boulevard.

Case No. ZA 2007-3804(CDP)(CU) – On January 11, 2008, the applicant withdrew an application to the Office of Zoning Administration for a Coastal Development Permit, and a Conditional Use Permit to allow the installation and maintenance of an unmanned wireless telecommunications facility consisting of 12 panel antennas (three sectors of four antennas) screened and mounted on the rooftop of an existing single-story storage warehouse, and four equipment cabinets mounted inside the building that is located within the single jurisdiction of the California Coastal Zone located at 658-664 East Venice Boulevard (Trillium Consulting for T-Mobile).

Case No. ZA 2007-3515(CDP)(CUB)(SPP)- On September 19, 2008, the Zoning Administrator approved a Coastal Development Permit to allow the change of use of a 2,167 square-foot market/deli to market/deli and café on a 14,483 square-foot lot located within the single jurisdiction of the California Coastal Zone, a Conditional Use to permit the sale and dispensing of beer and wine only for on-site consumption in conjunction with the market/deli and café, and a Specific Plan Project Permit Compliance for the proposed change of use from a market/deli to market/deli and café located at 2321 Abbot Kinney Boulevard.

Case No. ZA 2006-6646(CDP)(CUB)(CU)(SPP) – On April 19, 2007, the Zoning Administrator approved a conditional use to allow the upgrading of an alcohol license from beer and wine to a full line of alcoholic beverages with hours of operation from 11 a.m. to midnight on Sunday through Wednesday and 11 a.m. to 2 a.m. on Thursday through Saturday, an existing restaurant accommodating approximately 49 patrons, in the Venice Coastal Zone; a Coastal Development Permit for the expansion of the existing restaurant with the addition of the outside patio area accommodating 10 patrons for a total of 49 patrons; and a Project Permit Compliance Review under the Venice Specific Plan, for the subject upgrade of alcohol license and the addition of the patio dining area to the existing restaurant located at 636-654 East Venice Boulevard.

Case No. ZA 2005-4195(ZAA) – On November 9, 2005, the Zoning Administrator approved a Zoning Administrator's Adjustment to allow a 1,305.5 square-foot addition to the rear of an existing single-family dwelling, observing a reduced 6-foot rear yard setback in lieu of the required 15 feet; and an adjustment to allow the proposed rear addition to observe a reduced west side yard setback of 4.49 feet in lieu of the required 6 feet located at 1670 South Electric Avenue.

Case No. ZA 2002-0421(CDP)(PP)(ZAD)(MEL) – On November 25, 2002, the Zoning Administrator approved a request to construct two new buildings and renovate an existing manufacturing building into artist-in-residences located at 2100 South Abbott Kinney Boulevard.

Case No. ZA 2000-5253(ZAD) – On May 3, 2001, the Zoning Administrator approved a request to build a block wall, 6 feet tall, in the front yard located at 692-698 West Venice Boulevard.

Case No. ZA 2000-3664(ZAD)(CDP)(SPP) – On February 5, 2001, the Zoning Administrator approved a request for nine artist-in-residence units located at 2110 South Narcissus Court and 513 East Victoria Avenue.

Case No. ZA 2000-3629(CDP)(SPP) – On February 15, 2001, the Zoning Administrator approved a request for a commercial laundry located at 2100 South Abbott Kinney Boulevard.

## **PUBLIC HEARING**

A public hearing was conducted on May 19, 2016, with Jason Chan acting as Hearing Officer.

Alan Conception, Project Representative

- Project request is a Coastal Development Permit, Project Permit, and Mello determination
- Demolition of a single-family dwelling, which has been vacant for 5 years and found to not be historic

- Site is zoned M1
- Venice Land Use Plan states industrial land is a valuable resource
- All parking is provided on-site. Stacked parking is provided.
- Building size is smaller than adjacent buildings; Proposed height is less than adjacent buildings; approximately 9-feet lower than adjacent building, and 5-feet lower than building located at the rear
- 2<sup>nd</sup>-floor features a step-back, which is a response to neighbor's concerns about height.
- Project has been reviewed by Venice Neighborhood Council, Land Use and Planning committee, and the President's Row Neighborhood Association
- Community is asking for a Condition of Approval to ensure parking is satisfied with any future tenant, or change of tenants
- Feasibility study was performed, and found that residential non-conforming rights no longer apply due to vacancy of dwelling unit
- A Mello determination from Housing is pending
- Engineering is requesting a 7-foot dedication, and a widening of roadway of 4-feet
- Notices of project were sent to a 250-foot radius
- Tenant undecided yet, so parking needs are not fully determined. However, a commercial use is not proposed, and parking satisfies light industrial use.
- Building is designed for a light industrial use.

Harris Levy, President's Row Neighborhood Association

- Project was reviewed
- Project is not asking for any deviations
- Ideally would like the site to stay residential, but understands the site is zoned for Industrial land uses
- Tenant is unknown at this time
- Parking concerns
- Request a 24-hour hotline for reporting concerns during construction

Mehrnoosh Mojallali, Venice Neighborhood Council, Land Use & Planning Committee

- Supports waiver of street dedication and street improvements

Jonathan Winfrey, Community Member

- Support waiver of dedication requirement

Robin Rudisill, Venice Neighborhood Council

- Project reviewed by Land Use & Planning Committee on May 2, 2016; however a second review is needed to clarify project

- Request for file to be kept open, as vote by full Neighborhood Council expected in June 2016
- Parking concerns, as unsure about specific use of site (office vs. industrial)
- Complementary towards applicant and project outreach

Simon Wolf, Community Member

- Concerns about lack of street parking, and demolition/construction impacts and project timeline

At the end of the hearing, the case was taken under advisement, and no official action was taken.

#### Written Correspondence

On August 16, 2016 the Venice Neighborhood Council voted to support the proposed project, on the condition that Mello feasibility study be approved, free parking for employees is provided on-site, and the availability of a parking attendant for the proposed parking stackers.

On July 28, 2016 a letter was submitted by People Organized for Westside Renewal (POWER) stating that, per Mello Act guidelines, the applicant has been unable to prove that a residential use is not feasible at the project site, regardless of the existing conditions, underlying zone, or existence of non-conforming uses.

#### MANDATED FINDINGS

In order for a coastal development permit to be granted all of the requisite findings maintained in Section 12.20.2 of the Los Angeles Municipal Code must be made in the affirmative. Following is a delineation of the findings and the application of the facts of this case to same.

1. **The development is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Chapter 3 of the California Coastal Act provides standards by which "the permissibility of the proposed developments subject to the provision of this division are determined." The Coastal Act also provides that: "New development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to existing developed areas able to accommodate it or, where such areas are not able to accommodate it, will not have significant adverse effects, either individually or cumulatively on coastal resources."

The subject property is zoned M1-1 designated for Limited Industrial land uses and is subject to the Venice Coastal Zone Specific Plan Area, Los Angeles Transportation Corridor Specific Plan Area, Director's Interpretation of the Venice SP for Small Lot Subdivision (ZI-2406), General Plan Footnote(s) area, Calvo

Exclusion Area Coastal Zone, Coastal Zone Commission Authority, liquefaction area, and within 5.43 kilometers to the Santa Monica Fault.

The Venice Coastal Zone Specific Plan (Ordinance No. 175,693) was adopted by the City Council on December 2, 2003. The Coastal Commission certified the Land Use Plan (LUP) for the Venice Coastal Zone area on June 14, 2001.

Properties to the north, east, south, and west are zoned M1-1 and M1-1-O and are developed with primarily one- and two-story light industrial buildings. Immediately to the north and west of the project site is a City of Los Angeles maintenance yard facility that includes a compressed natural gas refueling station. Properties immediately located to the south and east of the Subject Properties are developed with a series of nine, two-story, live-work units.

The applicant is requesting a Coastal Development Permit authorizing the demolition of an existing single-family dwelling and the construction of a two-story, 3,491 square-foot industrial building sited on a 5,405 square-foot lot zoned M1-1 within the single-jurisdiction area of the California Coastal Zone. The project also requires a project permit compliance review of a new industrial structure in the Venice Coastal Zone Specific Plan and a Mello Determination.

The new light industrial structure building will have an approximate 88-square-foot deck and approximately 623 square-feet of landscaping around the building with a maximum height of 29 feet, 6-inches tall and a varied roofline. According to the Specific Plan, the applicant is required to provide 13 automobile parking spaces on-site. The applicant purposes that a total of 11 off-street tandem, mechanically stacked automobile parking spaces, as well as 12 short-term and long-term bike parking spaces (will replace 2-parking spaces) will be provided to accommodate the required spaces.

Chapter 3 of the Coastal Act contains provisions that address the impact of development on public services, recreational opportunities, public access, scenic views, infrastructure, the environment, and significant resources. Applicable provisions are as follows:

- a. *Section 30220 Water-Oriented Activities:* The subject site is within the single-jurisdiction area of the Coastal Zone, but is located on a light manufacturing zone within a developed area approximately 3,780 feet from the shoreline. The project involves the demolition of an existing single-family dwelling and construction of a light-manufacturing building. The site is not zoned or suited for water-oriented recreational activities.
- b. *Section 30222 Private Lands for Commercial Recreational Facilities.* The site is zoned for light manufacturing uses, is not designated a recreation area, and is not adjacent to the coastline. This privately owned-site developed with a single-family dwelling and is therefore not suitable for commercial recreational facilities for coastal recreation.
- c. *Section 30230 Marine Resources.* The site is within the single-jurisdiction

area and is over 3,780 feet from the coastline. The site is zoned for light manufacturing uses and currently developed with a vacant single-family dwelling, and surrounded by development on all sides. The proposed project will not involve diking, filling, or dredging of open coastal waters, wetlands, estuaries, or lakes. The proposed project will result in no impact on marine resources.

- d. *Section 30240 Environmentally Sensitive Habitat Areas.* The project will not impact any marine resources. The site is over 3,780 feet away from the coastline and within a fully developed area, and well above the high tide line and will not have any identifiable effect on the Pacific Ocean, the Venice breakwater or on the sandy intertidal zone.
- e. *Section 30244 Archeological or Paleontological Resources.* The subject site is currently improved with a single-family home and surrounded by development. No new archeological or paleontological resources are anticipated to be identified with the implementation of the project, as the site is currently developed.
- f. *Section 30250 Existing Developed Area.* The subject site is located within a developed area. The proposed project is the demolition of an existing single-family home and subsequent construction of a new light manufacturing building. The existing building is sited on land zoned M1-1 and has lost its non-conforming land use rights due to the discontinued use of the residential dwelling.
- g. *Section 30251 Scenic and Visual Qualities.* The project's location results in no impact on scenic or visual qualities of coastal areas or prominent natural landforms. The site is not located along or near a designated scenic corridor and is located over 3,780 feet away from the coastline.
- h. *Section 30252 Public Access to the Coast.* The subject property is located inland and away from any coastline, and the proposed project does not block any existing access to the beach and has therefore no impact on shoreline access.
- i. *Section 30253 Minimization of Hazardous Impacts.* The subject property is flat and not located along a bluff or cliff. No grading, excavation, draining, or dredging is proposed. The site is not within a Methane Buffer Zone, Tsunami Inundation Zone, or landslide area, and located within 5.4 kilometers from the Santa Monica Fault. It is located within a Liquefaction area. However, the project is required to comply with state and local building codes that would minimize structural and seismic impacts.
- j. *Section 30260 Coastal-Dependent Industrial Facilities.* The project will complement similar light manufacturing buildings in the nearby Venice neighborhoods. The project site is currently developed with a single-family home building and no industrial facilities are on-site.

The proposed project is not expected to impede any water-oriented recreational facilities or activities. The project proposes to provide all parking requirements and satisfies all requirements regarding to the building envelope. The property is presently developed with a single-family residence on property located with a zone classification designated for light manufacturing land uses. The existing buildings have been vacant for an extended period of time and have lost their non-conforming rights per the underlying zone. The proposed demolition of the single-family residence and construction of a new light manufacturing building has no impact on the location or operation of coastal dependent recreational uses or industrial facilities.

As articulated above, and as conditioned, the development is in conformity with Chapter 3 of the California Coastal Act of 1976.

2. **The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Currently, there is no adopted Local Coastal Plan (LCP) for this portion of the Coastal Zone. In the interim, the adopted Venice Community Plan serves as the functional equivalent. The Venice Community Plan Map designates for Limited Manufacturing with a corresponding zone of M1 and Height District No. 1. The property is within the area of the Los Angeles Coastal Transportation Corridor and Venice Coastal Zone Specific Plans. The subject property is zoned M1-1 and is consistent with the community plan in terms of the use and the density.

The proposed use is permitted in the M1 Zone and plan designation of the Venice Community Plan.

3. **The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination. Such Guidelines are designed to provide direction to decision-makers in rendering discretionary determinations on requests for coastal development permits pending adoption of an LCP. In this instance, the Guidelines standards concerning the following are relevant:**

California Coastal Commission's Interpretive Guidelines have been reviewed and considered in preparation of these findings. However, following prevailing case law (e.g., *Pacific Legal Foundation v. Coastal Commission* (1982) 33 Cal.3d 158), the City's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations. The development regulations of the Venice Specific Plan have been considered and the project was found to comply with the requirements of the Oakwood-Milwood-Southeast Venice Subarea regarding parking, height, and access, and further complies with the standards for new industrial development.

4. **The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.**

The proposed project is consistent with the previous decisions of the City and the California Coastal Commission that included new construction, improvements and remodels to existing residential structures.

- In February 2016, the Commission approved an Administrative Permit to construct automobile lifts at 29-47 Windward Avenue.
- In May 2016, the Commission approved an Administrative Permit to demolish a single-family dwelling and construct a new single-family dwelling at 2919 Sanborn Avenue.
- In August 2013, the Commission approved an Administrative Permit to improve and expand a City-owned parking lot at 1600 Irving Tabor Court.

No outstanding issues have emerged which would indicate any conflict between this decision and any other decision of the Coastal Commission regarding the proposed demolition of a single-family dwelling and the new construction of an industrial building in the M-1 Zone. Therefore, the decision of the permit granting authority has been guided by applicable decisions of the California Coastal Commission.

5. **The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

Section 30210 of the Coastal Act states the following in regards to public access:

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, right of private property owners, and natural resources from overuse.

Section 30211 of the Coastal Act states the following in regards to public recreation policies:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

The subject property is in the single jurisdiction zone and is not located between the

nearest public road and the sea or shoreline of a body of water located within the coastal zone and the nearest public road to such geographic features. The parcel itself is not situated on a waterfront, and there are public roads and access ways between the subject property and the sea or shoreline of a body of water. There will be no dredging, filling, or diking of coastal waters or wetlands, and there are no sensitive habitat areas, or archaeological or paleontological resources identified on the site. The project is consistent with the underlying zone and building envelope requirements. Therefore, as proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

**6. An appropriate environmental clearance under the California Environmental Quality Act has been granted.**

On January 30, 2015, A Notice of Exemption (ENV 2014-3187-CE) was issued pursuant to from the California Environmental Quality Act (CEQA) pursuant to Article III, Section 1, Class 3, and Category 17 of the City CEQA Guidelines because the project is the demolition of an existing single-family dwelling and the construction of a new industrial building in an urbanized area have been determined not to have a significant effect on the environment.

A historical report prepared by PCR Services Corporation was submitted by the applicant on January 21, 2015 and reviewed by the Department of City Planning's Office of Historic Resources (OHR). The report found that subject property does not appear potentially eligible, either individually or as a contributing member of potential district, under any of the applicable federal, state, or local eligibility criteria. Although the residence is associated with historic themes identified in the Los Angeles' Citywide Historic Context Statement, such as the Pre-Consolidation of Venice (1850-1925), the report found that the subject residence is an altered and typical example of a common beach bungalow residence and is not part of a distinctive grouping of bungalows and does not reflect or exemplify the broad cultural, political, economic, or social history of the nation, state, or city. A precise date of construction could not be confirmed, but the structure was built between the years 1900-1923. The structure does not exhibit the characteristic workmanship of a particular style or period, and as a result of deterioration and alterations the residence does not maintain integrity of workmanship. The residence has lost its feeling as a turn-of-the-century beach cottage due to extensive damage and alterations and therefore its integrity of feeling is compromised, according to the historical report. Further, the residence has been moved from its original location and relocated to the subject site in 1923, and therefore does not retain integrity of location from its earlier association. Because the subject property is not a historical resource, the proposed project ("Project") has no direct impact on historic resources and no further evaluation is needed to comply with CEQA. In addition, the Project does not materially impair the setting of other historical resources in the project vicinity, and therefore, under CEQA, the Project would have no indirect impact to historical resources in the project vicinity.

**MELLO FINDING**

**7. The project is consistent with the special requirements for low and moderate**

**income housing units in the Coastal Zone as mandated by California Government Code Section 65590 [Mello Act].**

The proposed project will be for an industrial use in a designated industrial zone and will not include any residential components. On July 19, 2016 the Housing and Community Investment Department (HCID) issued a Mello Act Determination for subject site, and found that no affordable units exists on-site. Specifically, HCID studied Department of Water and Power Bills and found that minimal water and electricity was used between the years 2014-2016. Thus, it can be concluded that the dwelling unit has been vacant for a period of over 365 days. Further, the proposed project neither meets nor exceeds the threshold of 10 or more dwelling units to require an affordable housing component as mandated by California Government Code Section 65590 (Mello Act).

On February 22, 2016 the applicant submitted a feasibility study for the proposed demolition of the existing single-family dwelling. The study found that a residential use is no long feasible at this site due to a combination of economic, social, environmental, and technical factors. Notably, the study found that a residential use is not feasible due to the underlying M1 zone. Residential uses are not a by-right allowed use in the M1 zone; a zone variance would be required to permit a residential use. Further, the existing dwelling has been vacant for an extended period of time and has been discontinued for over one year, and thus has lost its non-conforming rights allowed by Code. Only the machine shop in the rear may continue, as this use is a permitted use in the M1 zone. The non-conforming land use affects all other factors that require analysis by the feasibility study. Economic factors were weighed by the financial cost of a zone variance and uncertain outcome of a variance request. Environmental factors make the project infeasible as a land use conflict with any applicable land use plan or policy would create a potentially significant impact, per CEQA guidelines. Technical factors are supported by a letter from the Department of Building & Safety from February 11, 2016 that states the existing building can no longer have any non-conforming rights as a residential building which use is not permitted in the an M1 zone, per Section 12.23,B-9 of the Code. Further, the Interim Procedures for compliance with the Mello Acts states the proposed removal of any residential may be argued for "if the existing underlying zone or any other applicable regulation prohibits all residential uses."

In summary, the proposed project satisfies all review and analysis per the Mello Act, as a residential use is not feasible on-site, and no affordable units are being removed.

**SPECIFIC PLAN PROJECT PERMIT COMPLIANCE FINDINGS**

In order for a specific plan project permit compliance to be granted all of the requisite findings maintained in Section 11.5.7-C of the Los Angeles Municipal Code must be made in the affirmative. Following is a delineation of the findings and the application of the facts of this case to same:

8. **That the Venice Coastal Development Project is compatible in scale and character with the existing neighborhood, and that the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood;**

Properties to the north, east, south, and west are zoned M1-1 and M1-1-O and are developed with primarily one- and two-story light industrial buildings. Immediately to the north and west of the project site is a City of Los Angeles maintenance yard facility that includes a compressed natural gas refueling station. Properties immediately located to the south and east of the subject properties are developed with a series of nine, two-story, live-work units.

The subject property is a relatively level, irregular-shaped, inner parcel of land comprised of two adjacent lots totaling approximately 5,405 square-feet. The subject property has an approximate 108.94-foot frontage along the southwestern side of Narcisus Court, an approximate depth of 110.03-feet to the east, an approximate depth of 77.40 feet to the west and an approximate width of 30.75 feet to the south. The property is currently developed with a one-story, vacant single-family dwelling built between 1900-1923 which was relocated to the subject site in 1923, and proposed to be demolished.

The site and surrounding lots are zoned M1; the nearest residentially zoned lots are approximately 280 feet to the north. The existing residential building that is to be demolished is the last dedicated residential building in the immediate area. A two story building directly southeast of the project site contains nine live-work units; otherwise, there is no other residential in the vicinity. All adjacent buildings are developed with light industrial buildings with various land uses that include, but are not limited to, gymnasiums/fitness centers, multi-media offices, video game developers, and a furniture store.

According to the project representative, a specific light industrial use and/or specific tenant has not been identified for the proposed project yet. However, it is reasonable to conclude that the proposed uses are consistent with the surrounding light industrial land uses mentioned above, based on the open and unobstructed floor plan of the buildings, which is conducive to light manufacturing, multi-media, film production, and graphic arts which fit into the local pattern of Venice artists and crafts persons. Further, the exterior elevations and modern architectural style of the proposed building are consistent with the architectural style of surrounding light industrial buildings.

In light of the above, it can be found that the project, as conditioned, substantially complies with the applicable regulations, standards and provisions of the Specific Plan.

9. **The Venice Coastal Development Project is in conformity with the certified Venice Local Coastal Program.**

The property is located within the Oakwood-Milwood-Southeast Venice subarea of the Venice Coastal Zone Specific Plan. It is designated for Limited Industrial land

uses in the Venice Land Use Plan, a component of the Venice Local Coastal Program that was certified by the California Coastal Commission on June 14, 2001. The property is zoned M1-1.

The applicable provisions of the Specific Plan to this project are contained in Sections 9 (General Land Use and Development Regulations), 10.G (Land Use Regulations for the Oakwood-Milwood-Southeast Venice Subarea), 11 (Commercial and Industrial Design Standards), and 13 (Parking). The proposed project has been designed and conditioned to meet the applicable land use, design and parking standards of the Specific Plan:

Parking – A total of 13 automobile parking spaces are required for the proposed industrial use. Pursuant to Section 12.21 A (4) of the Los Angeles Municipal Code, up to 20% of new or existing automobile parking spaces for all uses may be replaced with bicycle parking spaces at a ratio of 4 bicycle parking spaces to every automobile space. The applicant is also required to provide 2 short-term and 2 long-term bicycle spaces on-site. A total of 11 off-street tandem, mechanically-stacked automobile parking spaces, as well as 12 short-term and long-term bicycle parking spaces will be provided. All required 11 vehicle parking spaces will be provided on-site with a tandem and mechanically-stacked layout. Finally, the addition of 8 bicycle parking spaces will be installed in lieu of the 2 required automobile spaces, reducing the amount of required automobile parking spaces to 11.

Height - The proposed new construction will include a two-story, light industrial building totaling 3,491 square-feet with a maximum height of 29 – feet, 6-inches with a varied roofline. The maximum height limit for Subarea G restricts building heights to a) 25-feet for flat roofs b) 30 feet for varied or stepped back roofline and c) 28-feet for Walk streets. The project has a varied roof line and is not located on a Walk Street, therefore the proposed structure complies with the height requirements of the Specific Plan.

Roof Structures – The project is conditioned to comply with the applicable roof structure limitation of Section 9.C.1.a.

Ground Floor Industrial Development - Industrial projects are required to incorporate entrances, eye-level displays, a contrast in wall treatment, an offset wall, or other decorative features in the ground floor of the project (at least 65 percent) facing the street. As shown in Exhibit A, the frontage on Narcisus Court is composed of natural material including anodized aluminum, steel, glass, wood, and concrete. The materials are integrated throughout the facade, create a recessed, transparent entry, and provide interesting architectural details at the ground floor. The main pedestrian entrance is enhanced by a high level of transparency and highlighted through the use of landscaping. Therefore, the project complies with Section 11.C of the Specific Plan.

In light of the above, it can be found that the project, as conditioned, substantially complies with the applicable regulations, standards and provisions of the Specific

Plan.

10. **That the applicant has guaranteed to keep the rent levels of any Replacement Affordable Unit at an affordable level for the life of the proposed Venice Coastal Development Project and to register the Replacement Affordable Units with the Los Angeles Department of Housing;**

The proposed project will be for an industrial use and will not include any new residential components. Currently, no affordable dwelling housing units on the project site. As such, the project will not be removing affordable housing in the area. The proposed project will be a change from a non-conforming residential use to one that is consistent with the current M1-1 (light industrial) zoning and General Plan land use designation for this site.

11. **The project is consistent with the special requirements for low and moderate income housing units in the Venice Coastal Zone as mandated by California Government Code Section 65590 (Mello Act).**

The proposed project will be for an industrial use and will not include any residential components. Currently, no affordable dwelling housing units are on the project site. As such, the project will not be removing affordable housing in the area. The proposed project neither meets nor exceeds the threshold of 10 or more dwelling units to require an affordable housing component as mandated by California Government Code Section 65590 (Mello Act).

12. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone C, areas of minimal flooding.
13. On January 30, 2015, the project was issued a Notice of Exemption, log reference ENV 2014-3187-CE, for a Categorical Exemption, Class 3, Category 17, Article III, Section 1, City CEQA Guidelines (Sections 15300-15333, State CEQA Guidelines). I hereby adopt that action.

Inquiries regarding this matter shall be directed to Jason Chan, Hearing Officer for the Department of City Planning at (213) 978-1310.



THEODORE L. IRVING, AICP  
Associate Zoning Administrator

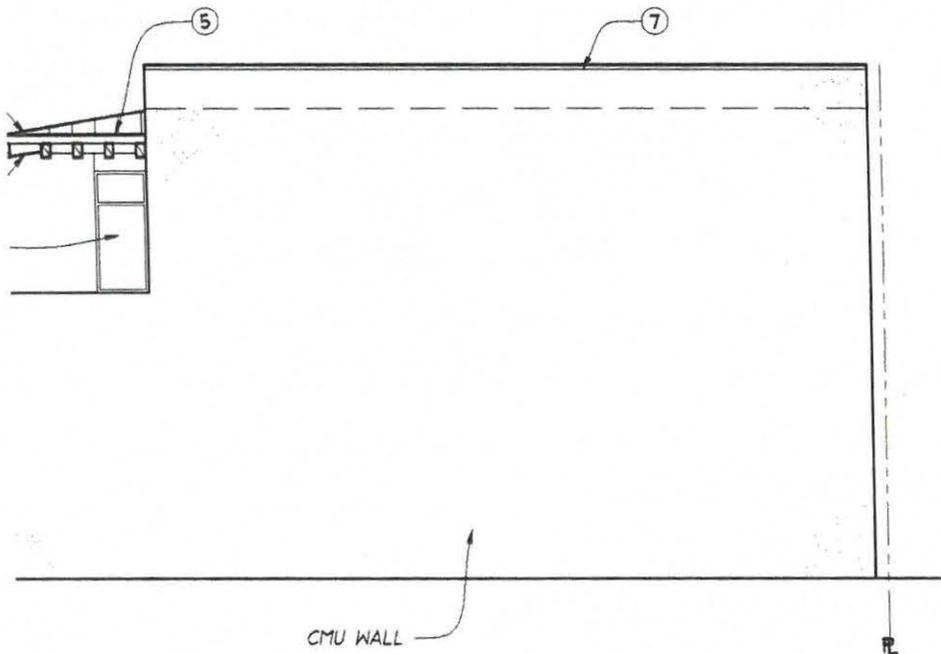
TL:jc

cc: Councilmember Mike Bonin  
Eleventh District  
Adjoining Property Owners  
County Assessor

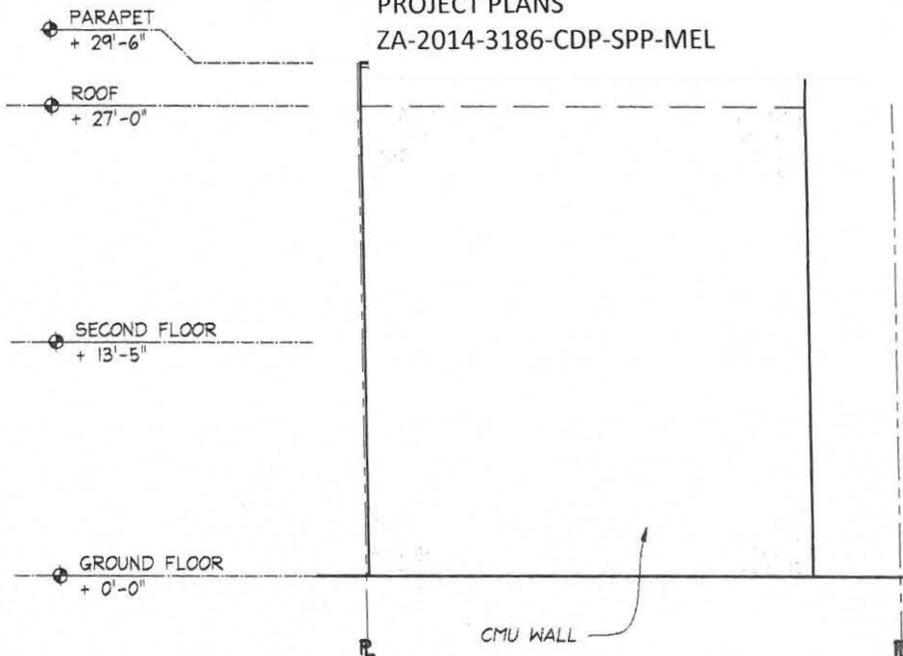
# EXHIBIT C

PROJECT PLANS

ZA-2014-3186-CDP-SPP-MEL



## NORTH ELEVATION

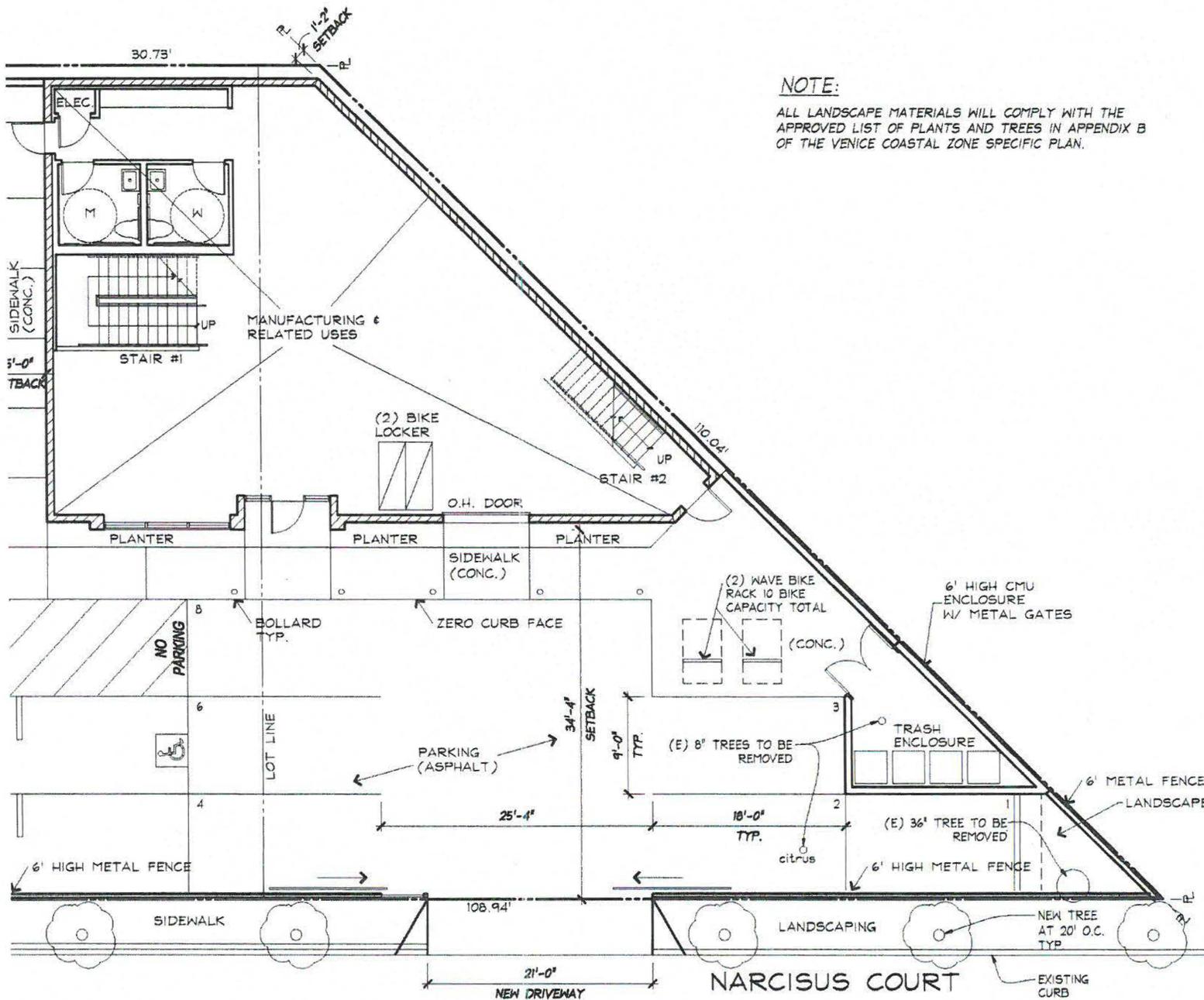


## WEST ELEVATION

ELEVATION KEYNOTES:

- |   |   |
|---|---|
| ① CAST-IN-PLACE CONCRETE                          | ⑨ STANDING SEAM METAL ROOF, PRE-FINISHED        |
| ② STUCCO FINISH (SMOOTH-PAINT)                    | ⑩ WOOD ROOF FRAMING                             |
| ③ ANODIZED ALUMINUM WINDOW FRAMES W/ TINTED GLASS | ⑪ +42" HIGH GUARDRAIL- METAL CABLE              |
| ④ WOOD SIDING                                     | ⑫ STEEL COLUMN- PAINTED                         |
| ⑤ ANODIZED ALUMINUM                               | ⑬ CMU SITE WALL W/ STUCCO FINISH (SMOOTH-PAINT) |
| ⑥ WOOD DOOR                                       | ⑭ ANODIZED ALUMINUM FRENCH DOOR                 |
| ⑦ METAL COPING, PRE-FINISHED                      | ⑮ SECTIONAL DOOR W/ GLASS PANELS                |
| ⑧ STEEL BEAM- PAINTED                             | ⑯ ORNAMENTAL METAL FENCE - 6 FT HIGH            |
|   | ⑰ HOLLOW METAL DOOR - 3'-0"x7'-0" AND FRAME     |

# SUS INDUSTRIAL BUILDING Owner: MBL Narcisus, LLC NORTH & WEST ELEVATIONS



**NOTE:**

ALL LANDSCAPE MATERIALS WILL COMPLY WITH THE APPROVED LIST OF PLANTS AND TREES IN APPENDIX B OF THE VENICE COASTAL ZONE SPECIFIC PLAN.

**LEGAL DESCRIPTION**

LOTS 69 AND 70 OF TRACT 6002, IN THE ANGELES, COUNTY OF LOS ANGELES, S. CALIFORNIA, AS PER MAP RECORDED IN 79 AND 80 OF MAPS, IN THE OFFICE OF RECORDER OF SAID LOS ANGELES COUN APN: 4237-003-030

**PROJECT SUMMARY**

ADDRESS: ..... 2106  
 SPECIFIC PLAN: ..... VENICE COA  
 DISTRICT ..... SOUTH E.  
 ZONE .....  
 USE ..... MANUFACTURING & RELA

SITE AREA: 5,405  
 SITE COVERAGE (FOOTPRINT) 1,86  
 LANDSCAPE AREA 6  
 CONSTRUCTION TYPE:  
 GROUND FLOOR  
 SECOND FLOOR  
 TOTAL FLOOR AREA  
 F.A.R.

**VEHICLES**

CARS REQUIRED (3 CARS + 350% CAR PARKING REDUCTION FOR B PER L.A.M.C. SECTION 12.21.A.4 CREDIT (20% OF 15 REQ'D CARS)

CARS REQUIRED  
 CARS PROVIDED ONSITE  
 CARS PROVIDED WITH IN LIEU FE

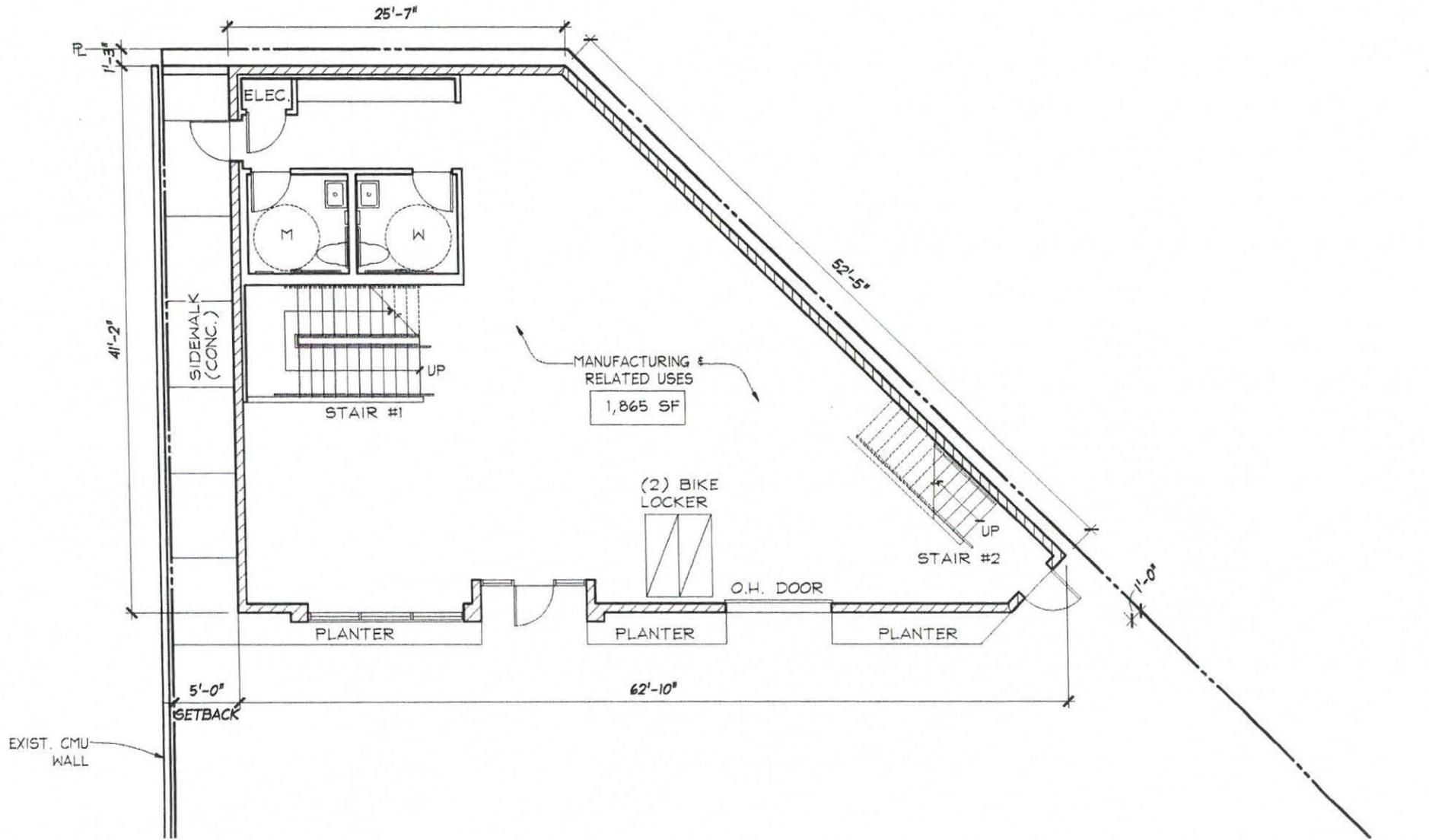
BIKE PARKING REQ'D FOR PARKING REDUCTION (4 BIKES/CAR X2)

BIKE PARKING PROVIDED  
 SHORT TERM INCLUDES BIKE PARKING CREDIT  
 LONG TERM

**SUS INDUSTRIAL BUILDING**

Owner: **MBL Narcisus, LLC**

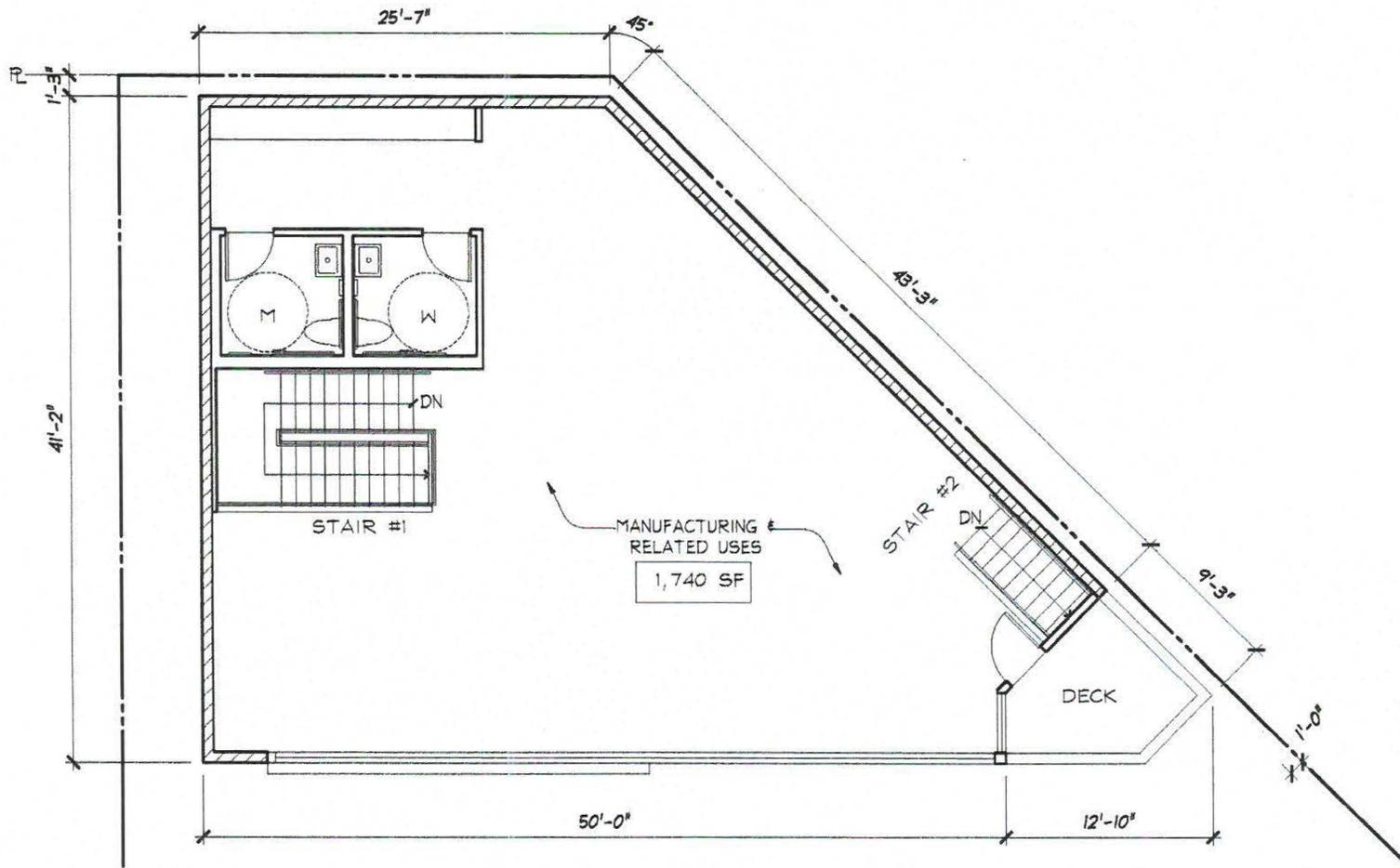
**SITE PLAN**



**SUS INDUSTRIAL BUILDING**

Owner: **MBL Narcisus, LLC**

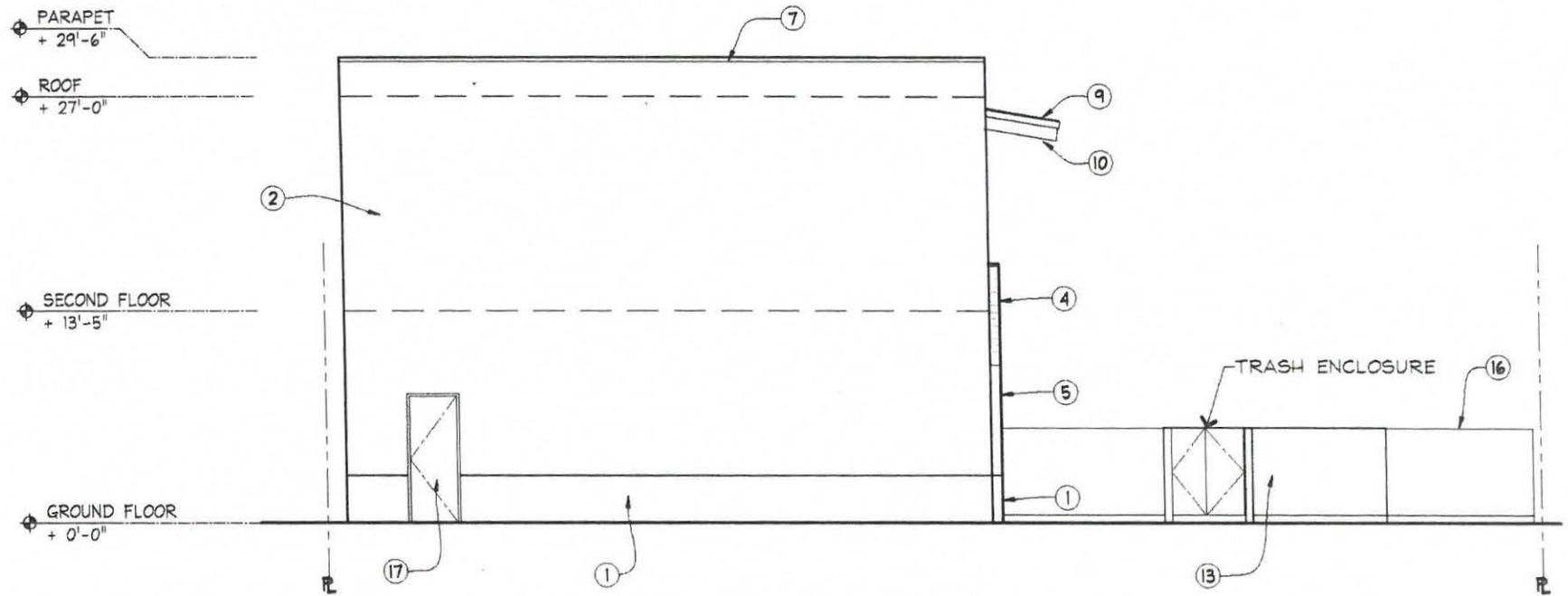
**GROUND FLOOR PLAN**



**SUS INDUSTRIAL BUILDING**

Owner: **MBL Narcisus, LLC**

**SECOND FLOOR PLAN**



ELEVATION KEYNOTES:

- |   |   |
|---|---|
| ① CAST-IN-PLACE CONCRETE                          | ⑨ STANDING SEAM METAL ROOF, PRE-FINISHED        |
| ② STUCCO FINISH (SMOOTH-PAINT)                    | ⑩ WOOD ROOF FRAMING                             |
| ③ ANODIZED ALUMINUM WINDOW FRAMES W/ TINTED GLASS | ⑪ +42" HIGH GUARDRAIL- METAL CABLE              |
| ④ WOOD SIDING                                     | ⑫ STEEL COLUMN- PAINTED                         |
| ⑤ ANODIZED ALUMINUM                               | ⑬ CMU SITE WALL W/ STUCCO FINISH (SMOOTH-PAINT) |
| ⑥ WOOD DOOR                                       | ⑭ ANODIZED ALUMINUM FRENCH DOOR                 |
| ⑦ METAL COPING, PRE-FINISHED                      | ⑮ SECTIONAL DOOR W/ GLASS PANELS                |
| ⑧ STEEL BEAM- PAINTED                             | ⑯ ORNAMENTAL METAL FENCE - 6 FT HIGH            |
|   | ⑰ HOLLOW METAL DOOR - 3'-0"x7'-0" AND FRAME     |

**SUS INDUSTRIAL BUILDING**

Owner: **MBL Narcisus, LLC**

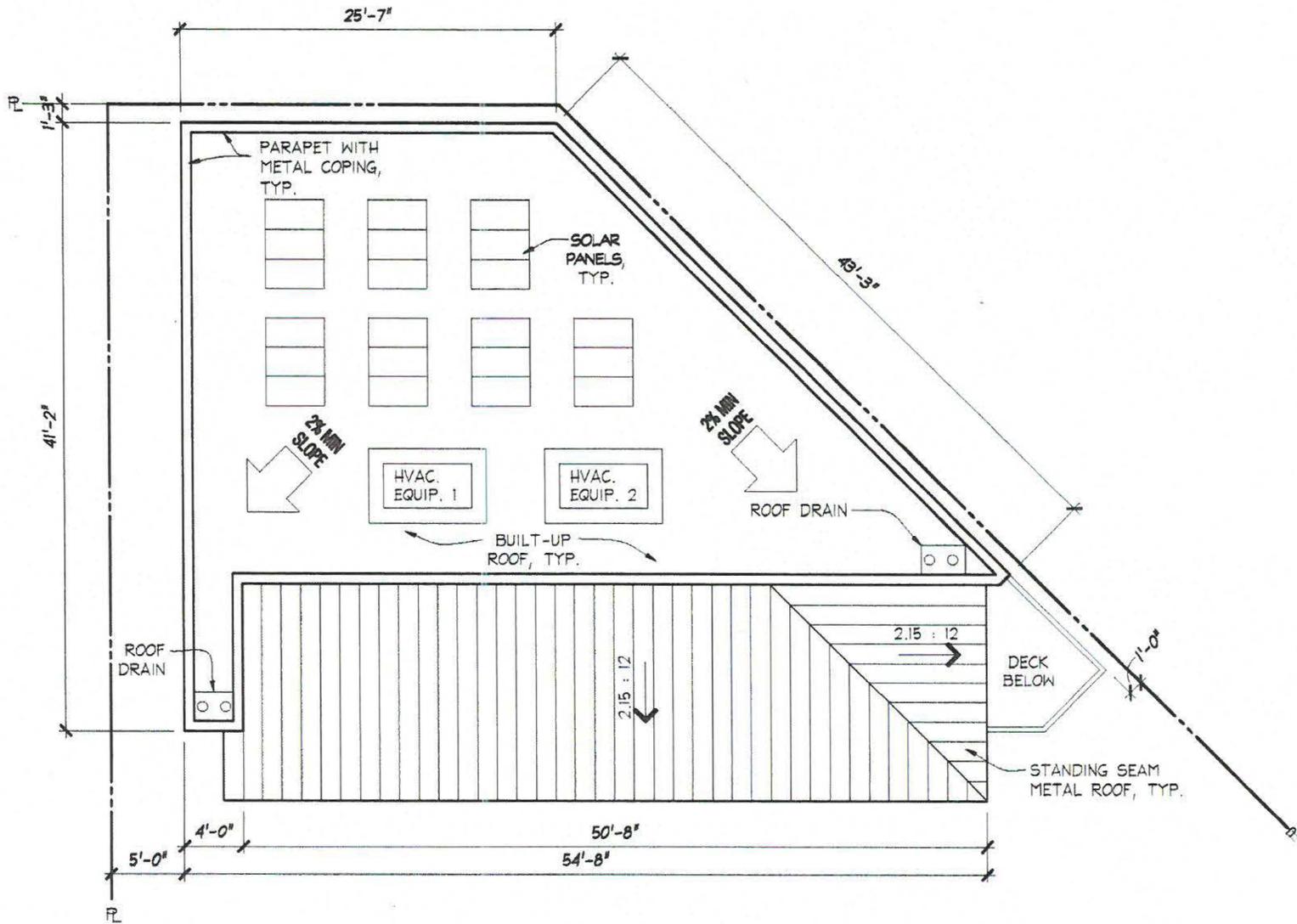
**SOUTH ELEVATION**

US CT.

VENICE, CALIFORNIA

Architect: **Chaff Co.**

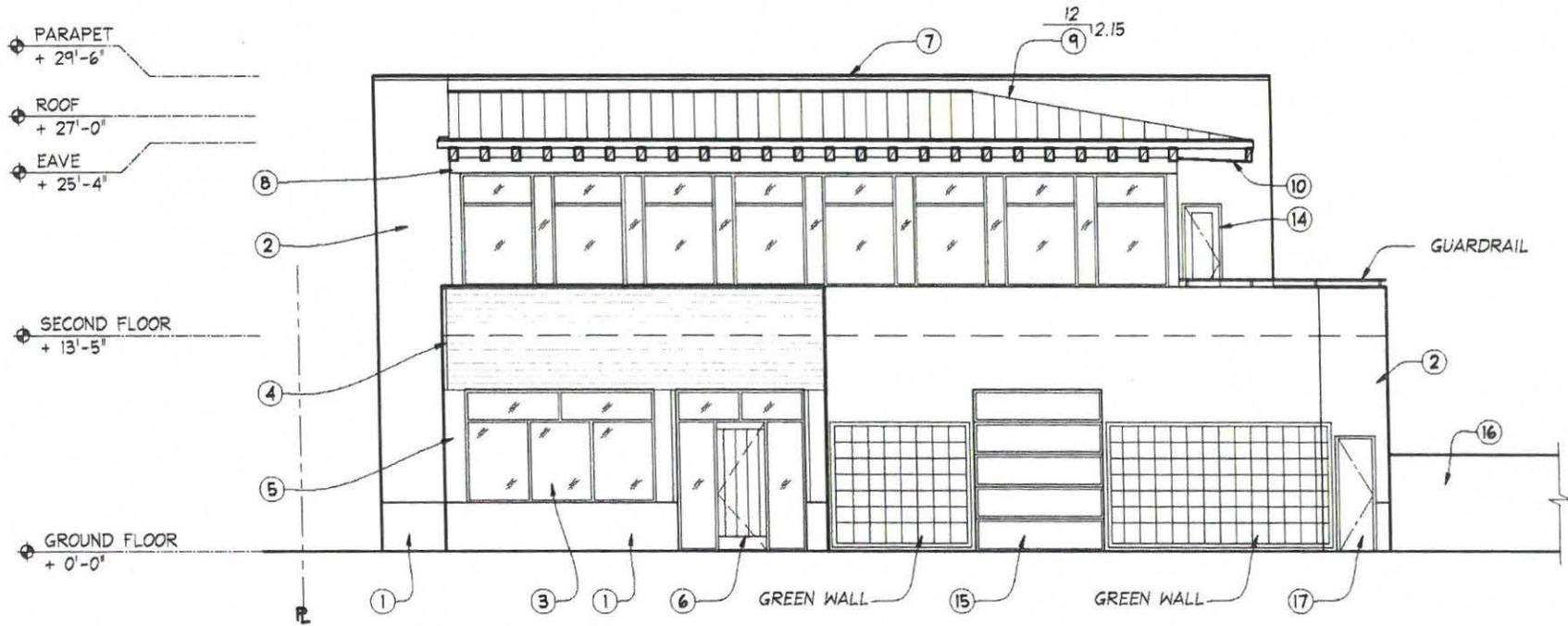
No. 1405.01 08/12/14



**US INDUSTRIAL BUILDING**

Owner: **MBL Narcisus, LLC**

**ROOF PLAN**



ELEVATION KEYNOTES:

- |   |   |
|---|---|
| ① CAST-IN-PLACE CONCRETE                          | ⑨ STANDING SEAM METAL ROOF, PRE-FINISHED        |
| ② STUCCO FINISH (SMOOTH-PAINT)                    | ⑩ WOOD ROOF FRAMING                             |
| ③ ANODIZED ALUMINUM WINDOW FRAMES W/ TINTED GLASS | ⑪ +42" HIGH GUARDRAIL- METAL CABLE              |
| ④ WOOD SIDING                                     | ⑫ STEEL COLUMN- PAINTED                         |
| ⑤ ANODIZED ALUMINUM                               | ⑬ CMU SITE WALL W/ STUCCO FINISH (SMOOTH-PAINT) |
| ⑥ WOOD DOOR                                       | ⑭ ANODIZED ALUMINUM FRENCH DOOR                 |
| ⑦ METAL COPING, PRE-FINISHED                      | ⑮ SECTIONAL DOOR W/ GLASS PANELS                |
| ⑧ STEEL BEAM- PAINTED                             | ⑯ ORNAMENTAL METAL FENCE - 6 FT HIGH            |
|   | ⑰ HOLLOW METAL DOOR - 3'-0"x7'-0" AND FRAME     |

**SUS INDUSTRIAL BUILDING**

Owner: **MBL Narcisus, LLC**

**EAST ELEVATION**





**EXHIBIT D**

SITE PHOTOS

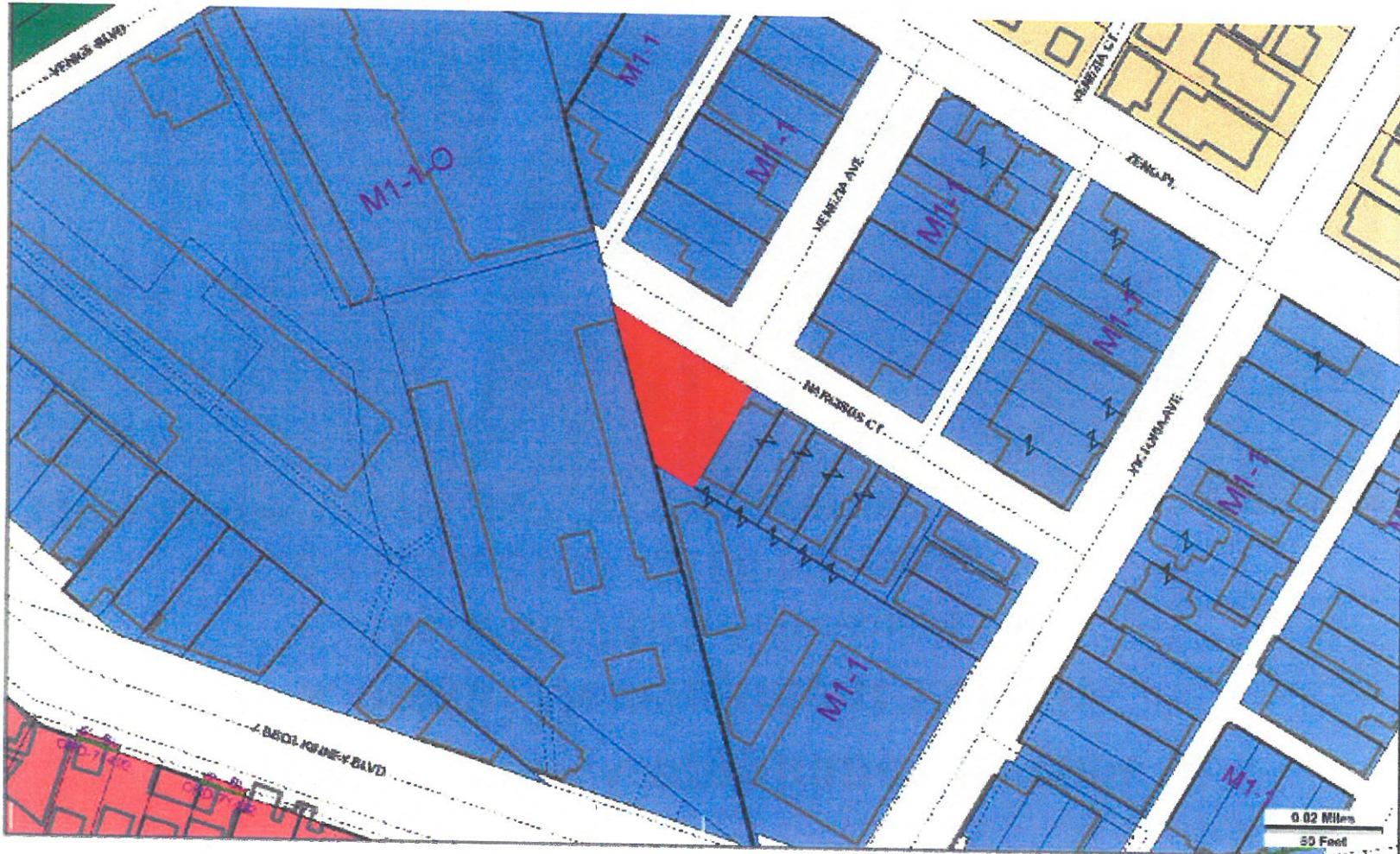
**P** LANNING  
**A** SSOCIATES,  
**I** NC.

**Project Permit Compliance Re**

**Coastal Development Permit**

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



1) Looking southeasterly at Project Site on Narcisus Ct.



2) Looking southerly at Project Site from Narcisus Ct.

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



3) Looking southwesterly at  
Project Site from Narcisus Ct.



4) Looking southwesterly at  
Project Site from Narcisus Ct.

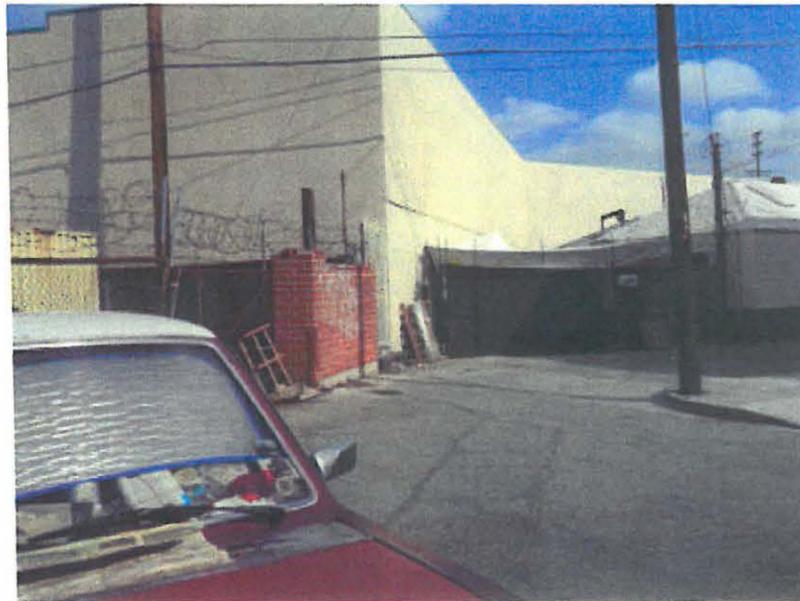
# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



5) Looking southwesterly at Project Site and adjacent live-work development across Narcisus Ct.



6) Looking northeasterly from Project Site across Narcisus Ct.

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



7) Looking northeasterly at development directly across Narcisus Ct. from Project Site



8) Looking southeasterly along Narcisus Ct.

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



9) Looking northeasterly along Venezia Ct. at corner of Venezia Ct. and Narcisus Ct.



10) Looking southeasterly along Narcisus Ct.

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



11) Looking southwesterly at adjacent live-work development across Narcisus Ct.



12) Looking southwesterly at adjacent live-work development along Narcisus Ct.

# **Project Permit Compliance Review & Coastal Development Permit**

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



13) Looking northeasterly across  
Narcisus Ct.



14) Looking northwesterly along  
Narcisus Ct. at Project Site

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



15) Looking northeasterly at live-work development on corner of Victoria Ave. at Narcisus Ct.



16) Looking northerly at live-work development across Victoria Ave.

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



17) Looking northwesterly at  
development across Victoria Ave.



18) Looking northeasterly at  
entrance of LA City facility yard

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



19) Looking at office at entrance of LA City facility yard



20) Looking northwesterly towards Project Site at LA City facility yard

# Project Permit Compliance Review & Coastal Development Permit

Applicant: MBL Narcisus, LLC

Address: 2100 - 2106 Narcisus Court



21) Looking northeasterly at LA  
City facility yard



22) Close-up of CNG fueling  
station