

Section 1

Summary of Applicant Responses to the Appeal of the Harbor Area Planning

Commission Decision

Case No. ZA-2023-7218-ZV-CDP-MEL-HCA-2A

Applicant Appeal Responses: ZA-2023-7218-ZV-CDP-MEL-HCA-2A

Background:

On February 19, 2026, the City of Los Angeles issued a Letter of Determination approving Planning Case No. ZA-2023-7218-ZV-CDP-MEL-HCA. The approvals included:

- A Coastal Development Permit pursuant to Los Angeles Municipal Code (LAMC) Section 12.20.2 and Section 138.9.1 of Chapter 1 A to allow the continuation and rehabilitation of an existing 736 square-foot historic cafe, proposing 73 total seats with 27 indoor seats and 46 uncovered outdoor seats with on-site sale and consumption of beer and wine with the proposed hours of operation of 8 A.M. to 8 P.M. daily and the demolition of an existing 1,118 square-foot garage, and the construction of a new, two-story 2,453 square-foot single-family dwelling with an attached 1,070 square-foot Accessory Dwelling Unit (ADU) both measuring 21 feet in height, along with an attached two-car garage and one (1) carport in the Dual Permit Jurisdiction Area of the Coastal Zone;
- A Zone Variance pursuant to Los Angeles Municipal Code (LAMC) Section 12.27 and Section 13.8.5.3 of Chapter 1 A to allow the continued use of an existing non-conforming historic cafe in the R1-1XL Zone;
- A Zone Variance Pursuant to Los Angeles Municipal Code (LAMC) Section 12.27 and Section 13.8.5.3 of Chapter 1 A to allow the on-site sale and consumption of beer and wine in the R1-1 XL Zone;
- A Mello Act Compliance Review pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures for the construction of two (2) new Residential Units in the Coastal Zone
- An exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301 (Class 1), 15303 (Class 3), and Section 15331 (Class 31)

Due to an administrative issue involving mail processing, the determination was not mailed in accordance with established City procedures. Accordingly, the Letter of Determination was reissued and mailed with a corrected mailing date on April 1, 2026. The Zoning Administrator's decision was appealed on April 16, 2026 by Noel Gould, Emma Rault, Robin Rudisill, and June Smith.

At its meeting on June 2, 2026, the Harbor Area Planning Commission rejected the appeal and upheld the Zoning Administrator's decision to approve the project in its entirety. The Letter of Determination was mailed in accordance with established City procedures on June 30, 2026. On July 15, 2026, the Harbor Area Planning Commission's decision was appealed by Noel Gould, Emma Rault, Robin Rudisill, and June Smith. This document contains the applicant's responses to the newer appeal of the Harbor Area Planning Commission's decision (Case No. ZA-2023-7218-ZV-CDP-MEL-HCA-2A) in Section 1 as well as responses to the previous appeal of the Zoning Administrator's decision (ZA-2023-7218-ZV-CDP-MEL-HCA-1A) in Section 2.

Appeal Point 1: Visual compatibility with the character, mass, and scale of the surrounding neighborhood under Coastal Act Section 30251

Applicant Response: The California Coastal Act (Section 30251 of the Public Resources Code) reads, in relevant part: *“The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.”*

The proposed development includes the rehabilitation of an historic cafe, the demolition of a dilapidated garage on the rear of the project site, and the construction of a new single-family home and accessory dwelling unit on a lot zoned for single-family residential development. The visual quality of the Project site will be enhanced by the rehabilitation of the historic Walker’s Cafe and the construction of the residential structure, which is designed to be aesthetically harmonious with the historic cafe building, as well as Point Fermin Lighthouse located in Point Fermin Park directly to the south of the Project site. The proposed development achieves visual compatibility by incorporating Spanish Colonial Revival architectural style, using stucco color and texture as well as tile cornice and rectangular massing to match the exterior design elements of Walker’s Cafe.

Furthermore, the proposed residential structure is compatible with other structures in the neighborhood which range in height and architectural style. Other residential buildings along the block face range in height from 13 feet (680 Paseo del Mar) to 33.7 feet (740 Paseo del Mar). The most recently constructed structures are the single-family home and accessory dwelling unit at 670 Paseo del Mar which is 26 feet in height (built in 2005) and the multifamily building at 746 Paseo del Mar which is 27.8 feet in height (built in 1989). The average height of residential structures along the Project’s block face is 21.8 feet. The height of the proposed structure is well within the range of heights seen throughout the neighborhood.

Of the properties that share a blockface with the project site and are developed with residential structures (710 Paseo del Mar only contains a 400-square foot garage structure and is, therefore, excluded from this evaluation), the lot coverage ranges from 18.7% to 68.7%. Again, the proposed development’s 33.2% lot coverage is well within this range. When the existing 736-square foot cafe on the subject site is added to the total structural lot coverage, it increases to 45.2%, which is still within the range of compatibility with what exists along the block.

The proposed residential structure also does not block views to and along the ocean and scenic coastal areas nor does it propose the alteration of natural land forms. Therefore, the proposed development and existing historic cafe comply with California Coastal Act Section 30251

Appeal Points 2 and 3: Continued operation of the historic Walker's Cafe

Applicant Response: The applicant has committed to rehabilitating the historic cafe's exterior by retaining and restoring the entry doors, the three existing windows immediately west of the primary entrance, the distinctive neon blade sign, the painted corrugated metal sign, the wood frame multi-light window on the west facade, and all exterior walls. Additionally, the cafe restoration portion of the project includes replacing the jalousie windows in the tripartite windows west of the main entrance with single-pane windows, adding exterior light sconces to the primary facade, replacing the security gate on the east facade with a new solid wood door, installing motion-sensor security light fixtures to the east facade and two spinning vents to the roof.

For the interior rehabilitation, the applicant will be retaining and restoring defining elements of the cafe's historic character including the arch over the bar area, the geometric wood screen, the existing linoleum tiles in the entrance and dining room, interior doors (except those requiring in-kind replacement), and the interior walls and ceiling which will be re-painted to match the existing color. Moreover, the interior rehabilitation work includes replacing back of bar equipment, storage, and shelving, restoring refrigeration room, dry pantry, sink room, and bathroom equipment including the tiles and plumbing. All of this must be completed while also upgrading the electrical system and bringing the floor plan into compliance with modern ADA and health and safety standards to the fullest extent possible while maintaining character-defining historic features.

In conjunction with the request to continue the operation of Walker's Café, the Applicant is applying for a Conditional Use Permit for Beverages to permit the continued sale of beer and wine for on-site consumption. They are also proposing the addition of rear patio and sidewalk seating areas available to patrons during daily operating hours from 8:00 am to 8:00 pm. The Applicant intends for Walker's Café to continue to serve the community as it has for many years and has already invested an immense amount of time and resources toward ensuring that outcome.

However, continued operation of the cafe is not a finding necessary for the approval of the variances or Coastal Development Permits which are the subject of this application nor is it a condition of approval for the Historic Cultural Monument designation that was approved by the City Council on August 24, 2022. Therefore, the appellants' recurring contention that the applicant does not plan to continue operating the cafe is unfounded and immaterial.

Appeal Point 4: Site circulation and emergency access issues

Applicant Response: Based on the regulations within the California Building Code Section 1020, the minimum corridor width for most occupancies is 44 inches. For occupancy loads of less than fifty occupants, the minimum corridor width is 36 inches. The occupant load of the rear area, which is an area of 681 square feet, is 45.4 occupants (the occupant load factor for an assembly with tables and chairs is 15 net square feet per person). Therefore, the required

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minimum egress pathway is 36 inches. The existing paved driveway along the east side of the property maintains a width of ten feet - more than three times the size of the egress pathway required for the outdoor seating area proposed behind the cafe.

The appellants provide no detailed or expert analysis to support their claim that the residential structure cannot safely and functionally coexist with the cafe, including the tables and chairs proposed for the rear cafe area. The City has professionals and processes tasked with evaluating emergency egress and routine circulation functionality. The project will have to comply with all Building and Safety regulations that address these issues including the plan check process and any requirements that arise from the City's routine inspections of the site.

Finally, the Council office is adding two conditions of approval to the Letter of Determination. The second of these two conditions addresses the exact issue that the appellants purport to dispute. This second condition reads: *"All new construction shall be designed and operated to preserve and support the function and visual integrity of the café, ensuring access for deliveries, service, and patron circulation. To facilitate the needs of future tenants, the property owner may propose minor changes to the site plan for deliveries, service, and patron circulation that shall be submitted and reviewed by the Department of City Planning and added to the case file, if approved."* If adopted, this will allow the applicant to modify the plans as required by the Department of Building and Safety, the Office of Historic Resources, and/or any future restaurant tenants identified by the property owner with the flexibility afforded by an administrative clearance. Therefore, this appeal point is adequately addressed by the existing mechanisms imposed by the City and presents no reason for denial of the project, as designed.

Appeal Point 5: Application of the CEQA "small structures" exemption

The California Environmental Quality Act (CEQA) includes categorical exemptions for certain types of projects according to their potential to cause a significant effect on the environment. The state has established 33 specific classes of projects—such as existing facilities, small new construction, and minor land alterations—determined not to have significant environmental impacts. The Class 3 categorical exemption (CEQA Guidelines, § 15303.) defines small structures as *"(a) One single-family residence, or a second dwelling unit in a residential zone. (In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.) (b) A duplex or similar multi-family residential structure totaling no more than four dwelling units. (In urbanized areas, this exemption applies to apartments, duplexes, and similar structures designed for not more than six dwelling units)... (e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences."*

California court case precedent has maintained this application. On January 30, 2019, the First District Court of Appeal (Div. 1) affirmed a judgment denying a writ petition challenging the City of Berkeley's approval of use permits for three single-family homes on three contiguous hillside parcels. The Court upheld the City's use of the CEQA Guidelines § 15303(a) (Class 3) categorical exemption for new construction of small structures, including "up to three single-

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family residences” in “urbanized areas.” (Berkeley Hills Watershed Coalition v. City of Berkeley (Matthew Wadlund, et al., Real Parties in Interest) (2019) 31 Cal.App.5th 880.)

Therefore, the appellant’s claim that the Class 3 categorical exemption from CEQA review does not apply is erroneous and unsupported by a literal interpretation of the CEQA Guidelines and

Section 2

Summary of Applicant Responses to the Appeal of the Zoning

Administrator Decision

Case No. ZA-2023-7218-ZV-CDP-MEL-HCA-1A

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Please find below the project team's responses to the points asserted in the appellant's Appeal Justification document dated April 16, 2026 below.

Response to Appeal Point 1: Under CEQA, piecemealing refers to the improper practice of artificially dividing a single project into smaller, separate parts in order to avoid or minimize environmental review. Piecemealing occurs when a lead agency analyzes only a portion of a project rather than the whole of an action, thereby understating the project's true environmental impacts and circumventing the comprehensive review CEQA requires.

The City's findings do not analyze the project on a piecemeal basis for the purposes of CEQA or the CDP. The City's CDP findings begin on page 31 of the Letter of Determination (dated April 1, 2026) and address the project in its entirety several times. For instance, when making the finding that "The permitted development will not prejudice 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 (page 34)," the City presents the consistency of the proposed project with both the Housing policies and standards of the Land Use Plan as well as the Commerce policies and standards of the Land Use Plan.

Additionally, Finding No. 11 of the City's Letter of Determination (page 38) states that "An appropriate environmental clearance under the California Environmental Quality Act has been granted." The City's criteria for finding the project categorically exempt detail exemption criteria pursuant to CEQA Guidelines Section 15301, CEQA Guidelines Section 15303, and CEQA Guidelines Section 15331. The exemption categories pertain to the requested Zone Variance for the on-site sale of beer and wine, the construction of a limited number of new, small facilities or structures (the single-family home and accessory dwelling unit), and the rehabilitation of the existing historic structure, respectively.

Response to Appeal Point 2: The City's reliance on the Howard Robinson and Associates (HRA) community character study is appropriate and consistent with established practices for evaluating visual compatibility under the Coastal Act. According to the study's methodology section, it utilized manual measurements confirmed with aerial imaging data from the Los Angeles Region Imagery Acquisition Consortium (LARIAC), which measures structures from the nearest flat surface (such as a driveway or walkway) to the highest point on their rooftops, excluding structures fewer than four feet in height. For properties developed on slopes or hillsides, the average surrounding natural grade of the property is used as the ground elevation height. While the appellants rely on building permit records from the Los Angeles Department of Building and Safety (LADBS), such records cannot be reliably located to verify the heights of surrounding structures in order to consistently ascertain comparative data upon which to base the visual impact analysis. Building records report the height that was authorized by LADBS, not the actual height of the building. Project team correspondence with the LARIAC Program Director and its contractor regarding height methodology has been submitted to the public record. Additionally, the proposed project is designed to be subordinate to its setting; at a height of 21 feet and an FAR of 1.26 to 1, the development is well below the maximum allowable height of 26 feet and the maximum allowable FAR of 3.00 to 1 for the site.

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Furthermore, when using the height data submitted by the appellants for structures with shared frontage along the project block, the project team still finds that the proposed residential structure is consistent with the pattern of development observed in the immediate vicinity. Of the eight (8)¹ distinct properties along the project's block with frontage on Paseo del Mar, six (6) were developed prior to the passage of the California Coastal Act. The six (6) structures developed pre-Coastal Act range in height from twelve (12) to 33 feet. They are all one story except for the three-story multifamily building constructed at 740 W Paseo del Mar which has a height of 33 feet (based on NavigateLA which uses LARIAC data).

Only two properties along the project's block have been developed since the passage of the California Coastal Act. They include a two-story multifamily building of approximately 28 feet in height (DBS records not available) constructed in 1989 at 746 W Paseo del Mar² and a two-story single-family home and ADU of 26 feet in height (based on LA DBS records) at 670 W Paseo del Mar. In total, at least three of the eight properties along the project's block are taller than the proposed project. Therefore, at a height of 21 feet, the proposed residential structure would not be out of scale with the development pattern observed within the neighborhood in terms of height. The available building permits referencing the stated heights above are included in the public record associated with the case file.

The residential structure maintains a front yard of 40'-8". About half of the depth is occupied by the existing historic Walker's Cafe. The historic cafe does not maintain a front yard setback. The residential structure also maintains a rear yard setback of 15 feet, consistent with the applicable requirements. The project's yards are clearly shown in the architectural plan on Sheet A1.04.

When analyzed in terms of lot coverage (the relationship between the footprint of a particular development, including all of its above-ground structures, and the total square footage of the lot that it occupies), the proposed development is consistent with the pattern observed on other properties along its blockface. The proposed project's residential structures would have a lot coverage of 33.2% (including the proposed garage), greatly below the lot coverage of the adjacent property to the east (690 W Paseo del Mar) which has a residential lot coverage of 42.06%. Even when the historic cafe structure is included in the lot coverage calculation, the total lot coverage of the subject site, along with its proposed residential development, is 45.19%. This is still generally consistent with the neighborhood with lot coverages that range from 12.12% (for the adjacent property to the west which includes only a 741.88-square foot garage) to 67.68% for the multifamily building located at 740 W Paseo del Mar. When excluding the adjacent property to the west which is only developed with a 741.88-square foot garage, the average lot coverage for developments along the project's block is 39.35%. This is greater than the residential lot coverage of 33.2% for the subject site's proposed structures and only slightly less than the total lot coverage proposed for the site when the historic cafe structure is included..

¹ Excluding the subject site.

² Alternate address: 741 W Shepard Street; Height data gathered from NavigateLA.

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Front setbacks along the block vary from six feet at 740 W Paseo del Mar to 60 feet at 680 W Paseo del Mar. (The property next door at 710 W Paseo del Mar currently has a front setback of 97 feet but only includes a garage at the back of the property with no residential structures.) The proposed 40-foot front yard setback for the subject property falls well within this range and is consistent with other front yards within the immediate vicinity.

Response to Appeal Point 3: It should be noted that the San Pedro Coastal Land Use Plan was never codified into the City of Los Angeles' municipal code and, therefore, can only be used as a guiding document, not as a set of development requirements for projects that fall within its geographic scope. However, the proposed project is compatible with the policies of the San Pedro Coastal Land Use Plan below:

Objective 1: To preserve and protect single-family residential areas from encroachment by other types of uses, including higher density residential development.

Objective 3: To designate changes in residential densities based on the relationship between neighborhood units, topography, nearness to highways, availability of commercial services, and adequacy of public facilities and at levels where it will not have significant adverse effects, either individually or cumulatively, on coastal access or coastal resources.

Objective 4. To recognize the existing sound housing stock as a valuable Community resource, the preservation of which can serve to reduce the high cost of housing associated with new construction.

Objective 5. To provide for the construction of new residential dwelling units necessary to meet the Community's forecasted housing needs.

Policy 6: The continuation of existing compatible land uses that are a recognized part of a neighborhood, although non-conforming with respect to zoning or the designation of the Plan map (such as "mom and pop" neighborhood markets), be permitted.

Height Standard (a): No building or structure shall be erected or enlarged within that portion of the Coastal Zone designated for residential use which exceeds two stories or a height of 26 feet as measured from the average existing natural grade to the highest point of the roof or parapet wall of the building, whichever is higher.

Parking Standard (a): Adequate on-site parking shall be provided by new development and where feasible in remodels in order to maintain and enhance public access to the coast.

Based upon the standards contained within the Los Angeles Municipal Code (Section 12.21. A.4.(a)), single-family dwellings are required to provide two onsite parking spaces. Additionally, ADUs are not required to provide any parking spaces when located within one-half mile of a public transit stop, including a bus stop. The project site is located

one-tenth of a mile from the Shepard / Gaffey Metro route 246 bus stop. Therefore, the provided parking is consistent with the applicable code requirements.

Even if the San Pedro LUP Parking standard found in LUP Appendix D were applied to the project, three parking spaces would be required for the single-family home since it is proposed on a lot greater than 40 feet in width. The LUP is silent on the parking required for ADUs. Therefore, the provided parking is consistent with the LUP's parking requirements as well.

No additional floor area is proposed for Walker's Cafe, which is a registered Historic Cultural Monument. Per LAMC 12.21. A.4.(x), no new automobile or bicycle parking is required in connection with that use. Floor area, as defined within the LAMC Section 12.03, includes "The area in square feet confined within the exterior walls of a Building," but does not include "exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, *Outdoor Dining Areas*, and Basement storage areas."

Walker's Cafe is positioned to serve patrons to Point Fermin who will use the parking designated resources provided by the recreational facility as well as onstreet parking along Paseo del Mar and Gaffey Street to access the park and its associated coastal resources. The historic cafe is not intended to have a regional draw that would require it to provide onsite parking for its patrons but to serve as a refreshment area for park visitors and neighborhood locals.

The proposed residential structure will be solely accessible by its rear alley, with its automobile and pedestrian entrances oriented toward the rear of the site, consistent with the San Pedro Community Plan goal LU1.6 which encourages the use of "alleys as an alternative, safe, well maintained vehicular access to homes that reduces curb cuts, driveways, and associated pedestrian-automobile conflicts along sidewalks."

As stated above, very little development has occurred in the area since the passage of the California Coastal Act. Of the properties located along the block face of the subject property, only one new single family home has been built within the last sixty years. Like the subject project, that development, located at 670 W Paseo del Mar, includes a single-family dwelling and ADU. The residential structures at 670 W Paseo del Mar reach 26 feet in height and occupy 32.34% of their lot area. At 21 feet in height and 33.2% of residential lot coverage, the proposed project has less development impact than the most recently approved residential project in its immediate vicinity. Amongst two-story developments within the study area, the proposed project features the least floor area, is the shortest in height, and features the greatest front yard setback. As such, the project is consistent with Section 30251 of the Coastal Act.

The project site is not located seaward of any viewsite or turnout areas, nor does it obstruct any public views. Therefore, the project is compliant with this provision of the Community Plan.

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The project's consistency with the guiding provisions of the Land Use Plan are detailed above. The project would not prejudice the City in its preparation of a local coastal program as it is consistent with other Coastal-jurisdiction projects recently approved by the Coastal Commission in the area including the 26-foot tall, 3,695-square foot single-family dwelling at 1305 W Paseo del Mar; the 26-foot tall, 3,548-square foot single-family dwelling at 1307 W Paseo del Mar; and the 21-foot tall, 2,328-square foot single-family dwelling at 1355 W Paseo del Mar. In its staff report for the project located at 1307 W Paseo del Mar, the Coastal Commission found no substantial issue in regards to the 26-foot height of the residential dwelling. (Commission staff did recommend that substantial issue be found with respect to that project's consistency with the Coastal Act and the LUP policies related to geologic hazards and environmentally sensitive habitat areas as that development included the presence of the unpermitted stairways on the bluff face and soldier piles as a bluff protective device.) Accordingly, the proposed project's design has been guided by prior decisions of the California Coastal Commission.

The proposed development's consistency with the Secretary of the Interior's Standards for Rehabilitation are adequately detailed in the memorandum prepared by Historic Resources Group on April 26, 2024. Two of the ten Secretary of the Interior Standards for Rehabilitation speak to the guidelines for new construction and its relationship to historic materials, Standards no.s nine and ten. Standard no. nine says "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." Standard no. ten says "New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."

In regards to the new construction's compatibility with the historic resource on the site, the Historic Memorandum reads: "In accordance with National Park Service guidance for related new construction, the proposed residential building will be located at the rear of Walker's Café, 13'-6" from the north (rear) façade of the Walker's Café building. The height and mass of the proposed residential building will be located behind the Walker's Café building away from its primary south-facing façade. The residential building will be located at the rear of Walker's Café, maintaining a 13'-6" distance between the rear façade of the Walker's Café Building and the residential building's southern facade.

In this way, the Walker's Café building will retain its visual prominence from the public right-of-way along Paseo del Mar or Pt. Fermin Park. The proposed new residential building will also be compatible in design and materials with the Walker's Café building by utilizing simple rectangular massing and smooth stucco cladding.

Construction of the residential building would not destroy any historic materials, features, or spatial relationships that characterize Walkers Cafe. The new building will be differentiated from Walker's Cafe and would be compatible with the historic materials, features, size, scale and

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proportion, and massing of the Walker's Cafe building. Thus, the Project would comply with Standard 9."

It goes on to say "The proposed residential building will be constructed as a separate and distinct structure, physically separated from the Walker's Café building by over 13 feet. The new residential building could be removed in the future without impairment to Walker's Café and the essential form and integrity of Walker's Café would be retained. Thus, the project would comply with Standard 10."

Therefore, as evaluated in the Historic Memorandum prepared by Historic Resources Group, the new single-family home and ADU would not diminish the integrity and setting of the landmark on the project site.

Other homes in the area include roof decks including the single-family home and ADU located approximately 100 linear feet to the east at 670 Paseo del Mar and the single-family home approximately 750 feet to the northeast at 548 Shepard Street. Therefore, the inclusion of a roof deck is not out of character with the neighborhood. The applicant has agreed to include landscaping elements on the interior edges of the roof deck in order to honor the privacy of the adjacent properties.

Furthermore, none of the other properties in the neighborhood have the same condition as the subject property which includes a historic cafe structure in its front setback. The only way to grant open space areas for the enjoyment of the proposed homes' occupants is to allow roof decks on the proposed residential dwellings. Contrary to the appellant's claims, no roof access structures are intended for the proposed project. Stairs to access the roof decks are exterior and do not include roof access structures.

As stated above, the proposed project's amount of lot coverage is consistent with the surrounding neighborhood. The chart below shows the amount of lot coverage as a percentage of the total lot area for the surrounding sites.

With the exception of 710 W Paseo del Mar, which is only developed with a 741.88-square foot garage at the rear of the property, lot coverages for the surrounding neighborhood range from 18.69% to 48.09%, consistent with the proposed project's 33.20% residential lot coverage (45.19% when the cafe is included in the lot coverage calculation).

Address	SFD or MF	Year Built	DBS Height	No. of Stories	Building Footprint ³	Lot Size ⁴	Lot Coverage		
720 W PDM	SFD	1916	17	1	2009.33	6499.011	30.92%		
730 W PDM	SFD	1921	17	1	2324.32	6510.664	35.70%		
690 W PDM	SFD	1929	18	1	2581.85	6138.44	42.06%		

³ Building footprint data gathered from NavigateLA.

⁴ Lot size data gathered from ZIMAS.

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680 W PDM	SFD	1946	13	1	1147.54	6138.402	18.69%		
710 W PDM ⁵	-	1951	12	1	741.88	6120.199	12.12%		
740 W PDM	MF	1962	33.7	3	4406.43	6510.681	67.68%		
741 W SHEPARD, 746 W PDM ⁶	MF	1989	27.8	2	7890.04	16407.62 5	48.09%		
670 W PDM	SFD + ADU	2005	26	2	4189.36	12,952.50	32.34%		
700 W PDM	SFD + ADU	2027	21	2	2038	6138.461	33.20%	45.19%	with Cafe

Response to Appeal Point 4: The appellants claim that the residential structure is incompatible with the onsite historic resource and incompliant with the Secretary of the Interior’s Standards for Rehabilitation but fail to substantiate these claims with any studies or conclusions from a qualified historian meeting the Secretary of the Interior Professional Qualifications Standards. Their claims about the relationship between the new construction and the historic resource only rise to the level of opinionated conjecture. The City’s finding that “The proposed rehabilitation has been reviewed by the Office of Historic Resources and found consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, as documented in the April 26, 2024 memorandum prepared by Historic Resources Group,” is based on the Historic Memorandum prepared by a qualified architectural historian.

Further, the appellants’ claim that the memorandum prepared by Historic Resources Group only refers to the rehabilitation of the cafe and does not refer to the new build or total project is incorrect. The memorandum refers to the total project, including the relationship between the new construction and existing historic building, many times throughout the document.

Response to Appeal Point 5: Although the operational viability of the cafe is not a required finding for the approval of the proposed project, it should be noted that the property owner is going to great lengths in order to further the rehabilitation and continued function of Walker’s Cafe. The owner/applicant is pursuing the following measures to assure the successful operation of the historic cafe:

- (1) Hiring an ADA consultant and an ABC consultant in order to inform the physical rehabilitation efforts associated with refurbishing the cafe structure in compliance with current ADA health code standards as much as possible while still maintaining internal and external elements germane to its historic designation.

⁵ 710 W Paseo del Mar only includes a 741.88-square foot garage and no associated residential floor area.

⁶ Height records for 730 Paseo del Mar, 740 Paseo del Mar, and 741 W Shepard not available through LADBS; height information gathered through NavigateLA

- (2) Proposing the construction of a single-family residential dwelling along with an accessory dwelling unit to help support the financial feasibility of rehabilitating and operating the historic cafe.
- (3) Proposing the addition of an outdoor rear seating area as well as seating in the public right-of-way in front of the building to increase the cafe's financial operational viability.

The efforts to rehabilitate and operate Walker's Cafe are consistent with California Coastal Act provisions, specifically Section 30213, which requires that "lower-cost visitor and recreational facilities be protected, encouraged, and, where feasible, provided to ensure equitable access to the coast for all income levels."

It is also worth noting that, as a condition of the project's approval, the Zoning Administrator has specified that no expansion of the cafe's existing floor area is authorized. Therefore, the appellant's assertion that the rear seating area prevents the cafe's expansion is immaterial. A floor plan showing the proposed locations of the residential and commercial trash locations is included in the public record. Deliveries to the cafe will happen in the existing driveway along the eastern edge of the property.

Response to Appeal Point 6: As a historic use that is not expanding its floor area (based upon the definition of floor area found in LAMC Section 12.03), the cafe is not required to propose additional parking. Walker's Cafe is intended to be a small, intimate, convenient location for refreshments for local community members and visitors to the local coastal resources including Point Fermin Park. As stated above, the Land Use Plan was never codified into the Los Angeles Municipal Code and, therefore, can only be used as a guiding document, not as a set of development requirements for projects that fall within its geographic scope. The LAMC provides the basis for evaluating the project's consistency with applicable requirements and regulations and, under the provisions of the LAMC, uncovered outdoor dining areas are not considered floor area and, therefore, do not require the provision of parking associated with floor area.

The applicant team is in agreement that alcohol service be excluded from the seating proposed in the public right-of-way and that this become a condition of the project's approval.

Response to Appeal Point 7: The appellants' claim that the development lacks a front and rear yard is untrue. The front yard setback for the single-family dwelling is 40'-8" although, given the positioning of the historic structure, it is mostly occupied by the cafe and its proposed rear seating area. The single-family dwelling also observes a rear yard setback of 15 feet, as required by the applicable regulations.

The appellants also claim that emergency egress would be constrained although they provide no detailed or expert analysis to support this assertion. Based on the regulations within the California Building Code Section 1020, the minimum corridor width for most occupancies is 44 inches. For occupancy loads of less than fifty occupants, the minimum corridor width is 36 inches. The occupant load of the rear area, which is an area of 681 square feet, is 45.4

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occupants (the occupant load factor for an assembly with tables and chairs is 15 net square feet per person). Therefore, the required minimum egress pathway is 36 inches. The existing paved driveway along the east side of the property maintains a width of ten feet - more than three times the size of the egress pathway required for the outdoor seating area proposed behind the cafe.

As stated above, the historic cafe has never maintained parking associated with its use. The current owner's intent to operate it as a locally-serving location for refreshments directed toward the local community and visitors to the nearby coastal resources is consistent with Coastal Act Section 30213, which requires that "lower-cost visitor and recreational facilities be protected, encouraged, and, where feasible, provided to ensure equitable access to the coast for all income levels." Based on the cafe's small footprint and positioning in an area where visitors are already parking to visit nearby coastal resources, it is reasonable to expect that its patrons will combine their trip with a visit to Point Fermin Park, the Point Fermin Lighthouse, and/or Sunken City (which is currently closed).

The consultant team visited the area surrounding the subject site on Sunday, May 10, 2026 between 1:30pm and 3pm in order to observe the parking behavior and supply in the vicinity. Based on the consultant team's observations, the immediately surrounding streets have the capacity for a total of 157 parked vehicles in both marked and unmarked spaces. Of those 157 spaces, 122 were occupied, leaving capacity for an additional 35 vehicles during the mid-day weekend inventory (which also happened to be Mothers' Day, bringing a particularly high amount of visitors). Additional seasonal parking supply is provided in a City-owned parking lot on the northwest corner of Shepard and Gaffey Streets. A complete inventory of the parking supply surveyed on Sunday, May 10, 2026 has been submitted to the public record.

Response to Appeal Point 8: The Zoning Administrator's decision was guided by several previous decisions of the California Coastal Commission including the above-named project at 1355 W. Paseo del Mar (Application No. 5-18-0999) which is a 21-foot tall 2,328 square foot single-family home (similar in height and square footage to the proposed primary residence at the subject site); a project at 1307 W. Paseo del Mar (Application No. A-5-SNP-19-0154/5-20-0152) which is a 26-foot tall 3,548-square foot single family home with a 1,124-square foot roof deck and rear yard deck; and a project at 1305 Paseo del Mar (Application No. A-5-SNP-19-0136/5-20-0153). Furthermore, the Coastal Commission also approved a project at 670 W. Paseo del Mar (Application No. 5-03-351) which is a 26-foot tall (22.5 feet tall in the Coastal application) single-family residence with a roof deck and an accessory dwelling unit on top of a detached four-car garage. All of these projects are similar (or greater) in height and square footage to the proposed project which includes the construction of a 21-foot tall 3,523-square foot single-family home with an attached 1,070-square foot accessory dwelling unit and two roof decks (one for each proposed residence).

Response to Appeal Point 9 (Other Miscellaneous Findings) : The site contains an existing 1,118-square foot garage that will be demolished in order to build the proposed new single-family dwelling and accessory dwelling unit. Based on the 1928 building permit

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application, the building was permitted as a garage. The garage has not been used as a dwelling unit and, therefore, does not require an affordable replacement dwelling unit according to the *Interim Administrative Procedures for Complying with the Mello Act in Coastal Zone Portions of the City of Los Angeles* (the Mello Act IAP).

As is stated in the project's Letter of Determination issued by the Zoning Administrator on April 1, 2026, "Pursuant to Part 2.4.2 of the Interim Administrative Procedures, developments which consist of nine or fewer Residential Units are Small New Housing Developments and are categorically exempt from the Inclusionary Residential Unit requirement. Therefore, the proposed development of two new Residential Units is found to be categorically exempt from the Inclusionary Residential Unit requirement for New Housing Developments."

Even if the garage was once used as a dwelling unit (for which there is no evidence), it certainly has not been used as a dwelling unit within the past year. According to the Mello Act IAP, "A Residential Unit shall not be classified as an Affordable Existing Residential Unit if it has been unoccupied for more than 365 consecutive days prior to the Application's filing." Therefore, the Letter of Determination's conclusion that an affordable replacement unit is not required for the proposed residential development is correct.

The project is eligible for three CEQA exemptions including: a Class 1 exemption (for modifications to existing facilities), a Class 3 exemption (for the construction of small structures), and a Class 31 exemption (for the rehabilitation and restoration of historical resources). Under CEQA Guidelines Section 15300.2., "these exemptions are considered to apply [in] all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies." Specifically, "A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code."

The site is not included on any map or list compiled pursuant to Section 65962.5 of the Government Code. Furthermore, a Geotechnical Investigation was completed by Applied Soil Technology, Inc. and their findings and recommendations documented in a report dated January 5, 2024. No indications of soil contamination are documented in their report. It should be noted that there is no evidence of an inspection pit currently existing within the garage. A conclusion that the garage was used for vehicle maintenance is conjectural. Therefore, there is no evidence to support the appellants' contention that there are soil contaminants dispersed within the ground of the subject site.

Conclusion:

Given the responses above, the 700 Paseo del Mar project team requests that the Los Angeles City Council affirm the findings made by the Zoning Administrator and Harbor Area Planning Commission regarding Planning Case No. ZA-2023-7218-ZV-CDP-MEL-HCA and deny the appeal in its entirety.

Brian Silveira & Associates

Section 3

Detailed Appeal Responses

Case No.s ZA-2023-7218-ZV-CDP-MEL-HCA-1A and ZA-2023-7218-ZV-CDP-MEL-HCA-2A

Detailed Appeal Responses: ZA-2023-7218-ZV-CDP-MEL-HCA-1A and ZA-2023-7218-ZV-CDP-MEL-HCA-2A

Background:

On February 19, 2026, the City of Los Angeles issued a Letter of Determination approving Planning Case No. ZA-2023-7218-ZV-CDP-MEL-HCA. The approvals included:

- A Coastal Development Permit pursuant to Los Angeles Municipal Code (LAMC) Section 12.20.2 and Section 138.9.1 of Chapter 1 A to allow the continuation and rehabilitation of an existing 736 square-foot historic cafe, proposing 73 total seats with 27 indoor seats and 46 uncovered outdoor seats with on-site sale and consumption of beer and wine with the proposed hours of operation of 8 A.M. to 8 P.M. daily and the demolition of an existing 1,118 square-foot garage, and the construction of a new, two-story 2,453 square-foot single-family dwelling with an attached 1,070 square-foot Accessory Dwelling Unit (ADU) both measuring 21 feet in height, along with an attached two-car garage and one (1) carport in the Dual Permit Jurisdiction Area of the Coastal Zone
- A Zone Variance pursuant to Los Angeles Municipal Code (LAMC) Section 12.27 and Section 13.8.5.3 of Chapter 1 A to allow the continued use of an existing non-conforming historic cafe in the R1-1XL Zone
- A Zone Variance Pursuant to Los Angeles Municipal Code (LAMC) Section 12.27 and Section 13.8.5.3 of Chapter 1 A to allow the on-site sale and consumption of beer and wine in the R1-1 XL Zone
- A Mello Act Compliance Review pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures for the construction of two (2) new Residential Units in the Coastal Zone
- An exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301 (Class 1), 15303 (Class 3), and Section 15331 (Class 31)

Due to an administrative issue involving mail processing, the determination was not mailed in accordance with established City procedures. Accordingly, the Letter of Determination was reissued and mailed with a corrected mailing date on April 1, 2026. The Zoning Administrator's decision was appealed on April 16, 2026 by Noel Gould, Emma Rault, Robin Rudisill, and June Smith.

Please find below the project team's responses to the points asserted in the appellant's Appeal Justification document dated April 16, 2026 with the appeal points italicized and the project team responses in [blue](#).

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Appeal Point 1 – The Project Was Evaluated on a Piecemeal Basis

The project is analyzed on a piecemeal basis. For both the CDP and CEQA, the City bases many of its conclusions only on either the single-family dwelling and ADU or on the café, but not both. The findings must be made based on the total project. The determination is essentially a piecemeal review of the project, noting only potential compliance based on either the residential structure or the café, but not based on the project as a whole. A piecemeal review of a project's compliance with the Coastal Act or CEQA is not allowed and thus those findings fail.

Response: Under CEQA, piecemealing refers to the improper practice of artificially dividing a single project into smaller, separate parts in order to avoid or minimize environmental review. Piecemealing occurs when a lead agency analyzes only a portion of a project rather than the whole of an action, thereby understating the project's true environmental impacts and circumventing the comprehensive review CEQA requires.

The City's findings do not analyze the project on a piecemeal basis for the purposes of CEQA or the CDP. The City's CDP findings begin on page 31 of the Letter of Determination (dated April 1, 2026) and address the project in its entirety several times. For instance, when making the finding that "The permitted development will not prejudice 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 (page 34)," the City presents the consistency of the proposed project with both the Housing policies and standards of the Land Use Plan as well as the Commerce policies and standards of the Land Use Plan.

Additionally, Finding No. 11 of the City's Letter of Determination (page 38) states that "An appropriate environmental clearance under the California Environmental Quality Act has been granted." The City's criteria for finding the project categorically exempt detail exemption criteria pursuant to CEQA Guidelines Section 15301, CEQA Guidelines Section 15303, and CEQA Guidelines Section 15331. The exemption categories pertain to the requested Zone Variance for the on-site sale of beer and wine, the construction of a limited number of new, small facilities or structures (the single-family home and accessory dwelling unit), and the rehabilitation of the existing historic structure, respectively.

Appeal Point 2 – The Community Character Analysis Is Based on Incorrect Height Data

The City determination (page 32) relied on the character study prepared by Howard Robinson and Associates in concluding that the proposed project is not expected to have a significant adverse impact on coastal resources. See applicant's height study at EXHIBIT A. The City found that the study indicates that the number of stories, height, Floor Area Ratio (FAR) and density of the proposed project are in line with that of the surrounding area. However, the study is materially flawed and cannot be relied on for any findings. The Community Character Analysis relies on inaccurate height data for surrounding structures, materially overstating the scale of neighborhood buildings. These are not rounding errors; correcting these errors materially changes the scale analysis.

Neither are these random errors, but rather there is a pattern of errors. These errors materially overstate and distort the baseline conditions used to evaluate compatibility and undermine the reliability of the City determination's findings regarding neighborhood character and visual scale.

Response: The City's reliance on the Howard Robinson and Associates (HRA) community character study is appropriate and consistent with established practices for evaluating visual compatibility under the Coastal Act. According to the study's methodology section, it utilized manual measurements confirmed with aerial imaging data from the Los Angeles Region Imagery Acquisition Consortium (LARIAC), which measures structures from the nearest flat surface (such as a driveway or walkway) to the highest point on their rooftops, excluding structures fewer than four feet in height. For properties developed on slopes or hillsides, the average surrounding natural grade of the property is used as the ground elevation height. While the appellants rely on building permit records from the Los Angeles Department of Building and Safety (LADBS), such records cannot be reliably located to verify the heights of surrounding structures in order to consistently ascertain comparative data upon which to base the visual impact analysis. Building records report the height that was authorized by LADBS, not the actual height of the building. Project team correspondence with the LARIAC Program Director and its contractor regarding height methodology are included as an attachment to this document. Additionally, the proposed project is designed to be subordinate to its setting; at a height of 21 feet and an FAR of 1.26 to 1, the development is well below the maximum allowable height of 26 feet and the maximum allowable FAR of 3.00 to 1 for the site.

Furthermore, when using the height data submitted by the appellants for structures with shared frontage along the project block, the project team still finds that the proposed residential structure is consistent with the pattern of development observed in the immediate vicinity. Of the eight (8)¹ distinct properties along the project's block with frontage on Paseo del Mar, six (6) were developed prior to the passage of the California Coastal Act. The six (6) structures developed pre-Coastal Act range in height from twelve (12) to 33 feet. They are all one story except for the three-story multifamily building constructed at 740 W Paseo del Mar which has a height of 33 feet (based on NavigateLA which uses LARIAC data).

Only two properties along the project's block have been developed since the passage of the California Coastal Act. They include a two-story multifamily building of approximately 28 feet in height (DBS records not available) constructed in 1989 at 746 W Paseo del Mar² and a two-story single-family home and ADU of 26 feet in height (based on LA DBS records) at 670 W Paseo del Mar. In total, at least three of the eight properties along the project's block are taller than the proposed project. Therefore, at a height of 21 feet, the proposed residential structure would not be out of scale with the development pattern observed within the neighborhood in terms of height. The available building permits referencing the stated heights above are included as attachments to this document.

¹ Excluding the subject site.

² Alternate address: 741 W Shepard Street; Height data gathered from NavigateLA.

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In addition, due to the lack of front and back yards and the unusually extensive lot coverage, a comparison of the sheer size or mass of the total project on the lot with lots in the surrounding area would result in an even more dramatic visual incompatibility with the surrounding area. Based on this clear evidence, the total project is materially incompatible with the surrounding area with respect to mass, scale and character.

Response: The residential structure maintains a front yard of 40'-8". About half of the depth is occupied by the existing historic Walker's Cafe. The historic cafe does not maintain a front yard setback. The residential structure also maintains a rear yard setback of 15 feet, consistent with the applicable requirements. The project's yards are clearly shown in the architectural plan on Sheet A1.04.

When analyzed in terms of lot coverage (the relationship between the footprint of a particular development, including all of its above-ground structures, and the total square footage of the lot that it occupies), the proposed development is consistent with the pattern observed on other properties along its blockface. The proposed project's residential structures would have a lot coverage of 33.2% (including the proposed garage), greatly below the lot coverage of the adjacent property to the east (690 W Paseo del Mar) which has a residential lot coverage of 42.06%. Even when the historic cafe structure is included in the lot coverage calculation, the total lot coverage of the subject site, along with its proposed residential development, is 45.19%. This is still generally consistent with the neighborhood with lot coverages that range from 12.12% (for the adjacent property to the west which includes only a 741.88-square foot garage) to 67.68% for the multifamily building located at 740 W Paseo del Mar. When excluding the adjacent property to the west which is only developed with a 741.88-square foot garage, the average lot coverage for developments along the project's block is 39.35%. This is greater than the residential lot coverage of 33.2% for the subject site's proposed structures and only slightly less than the total lot coverage proposed for the site when the historic cafe structure is included..

Front setbacks along the block vary from six feet at 740 W Paseo del Mar to 60 feet at 680 W Paseo del Mar. (The property next door at 710 W Paseo del Mar currently has a front setback of 97 feet but only includes a garage at the back of the property with no residential structures.) The proposed 40-foot front yard setback for the subject property falls well within this range and is consistent with other front yards within the immediate vicinity.

Appeal Point 3 – The City Improperly Relies on Uncertified LAMC Standards Rather Than the Certified Coastal Framework, and The Project Fails to Conform With Coastal Act Section 30251

Within the Coastal Zone, for a CDP, the size of a development is not simply allowed by right because it is in compliance with the City's uncertified zoning regulations, which is the way it works outside the Coastal Zone. Rather, development must be visually compatible with surrounding character and protective of scenic and community resources, in conformance with the standard of review for a CDP, the Coastal Act Chapter 3 and the related guidance of the certified San Pedro Coastal Land Use Plan

(LUP). If the single-family residence and ADU result in far more mass and scale than the surrounding structures and overwhelm the historic café, then the required Coastal Act findings cannot be made in the affirmative.

Response: It should be noted that the San Pedro Coastal Land Use Plan was never codified into the City of Los Angeles' municipal code and, therefore, can only be used as a guiding document, not as a set of development requirements for projects that fall within its geographic scope. However, the proposed project is compatible with the Housing policies of the San Pedro Coastal Land Use Plan, as detailed below:

Objective 1: To preserve and protect single-family residential areas from encroachment by other types of uses, including higher density residential development.

The proposed single-family home and ADU are consistent with the density found within the area immediately surrounding the subject site, which includes multifamily properties as well as single-family properties with associated ADUs.

Objective 3: To designate changes in residential densities based on the relationship between neighborhood units, topography, nearness to highways, availability of commercial services, and adequacy of public facilities and at levels where it will not have significant adverse effects, either individually or cumulatively, on coastal access or coastal resources.

As stated above, the single-family dwelling and ADU are consistent with the area's existing densities and are not expected to have significant adverse impacts on public facilities, coastal access, or access to coastal resources.

Objective 4. To recognize the existing sound housing stock as a valuable Community resource, the preservation of which can serve to reduce the high cost of housing associated with new construction.

The project aids in the preservation of existing housing by proposing two new housing units where none currently exist, eliminating the need to demolish any of the neighborhood's existing residential resources in order to add to the area's supply.

Objective 5. To provide for the construction of new residential dwelling units necessary to meet the Community's forecasted housing needs.

The project adds a net of two new units to the neighborhood's housing supply without displacing any existing housing units. These two new units will aid in meeting the community's housing needs.

Policy 6: The continuation of existing compatible land uses that are a recognized part of a neighborhood, although non-conforming with respect to zoning or the designation of the Plan map (such as "mom and pop" neighborhood markets), be permitted.

The historic Walker's Cafe, an existing "mom and pop" restaurant, will be rehabilitated and its use continued in conjunction with the proposed development. The construction and maintenance of the new single-family home and ADU will aid in the financial feasibility of rehabilitating the cafe and reinstating its use.

Height Standard (a): No building or structure shall be erected or enlarged within that portion of the Coastal Zone designated for residential use which exceeds two stories or a height of 26 feet as measured from the average existing natural grade to the highest point of the roof or parapet wall of the building, whichever is higher.

The proposed single-family dwelling and attached ADU measure 21 feet (two stories) in height from the average existing natural grade.

Parking Standard (a): Adequate on-site parking shall be provided by new development and where feasible in remodels in order to maintain and enhance public access to the coast.

Based upon the standards contained within the Los Angeles Municipal Code (Section 12.21. A.4.(a)), single-family dwellings are required to provide two onsite parking spaces. Additionally, ADUs are not required to provide any parking spaces when located within one-half mile of a public transit stop, including a bus stop. The project site is located one-tenth of a mile from the Shepard / Gaffey Metro route 246 bus stop. Therefore, the provided parking is consistent with the applicable code requirements.

Even if the San Pedro LUP Parking standard found in LUP Appendix D were applied to the project, three parking spaces would be required for the single-family home since it is proposed on a lot greater than 40 feet in width. The LUP is silent on the parking required for ADUs. Therefore, the provided parking is consistent with the LUP's parking requirements as well.

No additional floor area is proposed for Walker's Cafe, which is a registered Historic Cultural Monument. Per LAMC 12.21. A.4.(x), no new automobile or bicycle parking is required in connection with that use. Floor area, as defined within the LAMC Section 12.03, includes "The area in square feet confined within the exterior walls of a Building," but does not include "exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, *Outdoor Dining Areas*, and Basement storage areas."

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Walker's Cafe is positioned to serve patrons to Point Fermin who will use the parking designated resources provided by the recreational facility as well as onstreet parking along Paseo del Mar and Gaffey Street to access the park and its associated coastal resources. The historic cafe is not intended to have a regional draw that would require it to provide onsite parking for its patrons but to serve as a refreshment area for park visitors and neighborhood locals.

However, the proposed project is not in conformance with the Coastal Act or the LUP as it would be dramatically larger than most single-family dwellings and ADUs in the area and would have a significant adverse impact on community character, a Coastal Resource that is protected by the Coastal Act. Moreover, the applicant used several pre-Coastal Act apartment buildings as comps that are much larger than currently allowed.

Response: As stated above, very little development has occurred in the area since the passage of the California Coastal Act. Of the properties located along the block face of the subject property, only one new single family home has been built within the last sixty years. Like the subject project, that development, located at 670 W Paseo del Mar, includes a single-family dwelling and ADU. The residential structures at 670 W Paseo del Mar reach 26 feet in height and occupy 32.34% of their lot area. At 21 feet in height and 33.2% of residential lot coverage, the proposed project has less development impact than the most recently approved residential project in its immediate vicinity. Amongst two-story developments within the study area, the proposed project features the least floor area, is the shortest in height, and features the greatest front yard setback. As such, the project is consistent with Section 30251 of the Coastal Act.

Coastal Act Section 30251 Scenic and Visual Qualities: ...Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas...to be visually compatible with the character of surrounding areas...to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The City's determination on page 36, Finding 7, states "the new single-family dwelling and ADU are in line with the rest of the neighborhood use and in compliance with LAMC requirements." However, the LAMC is an uncertified zoning document, and Coastal Zone projects must be evaluated based on the certified zoning document, the LUP, and the Coastal Act. In addition, as is explained in Appeal Finding 2 above, the total project size is not at all "in line" with the rest of the neighborhood and in fact is significantly greater in terms of both height and scale/mass. Thus, this finding fails as the project is not visually compatible with the character of the surrounding area, and the project will prejudice the ability of the City to prepare a local coastal program in conformity with Chapter 3 of the Coastal Act.

Response: The San Pedro Coastal Land Use Plan was never codified into the City of Los Angeles' municipal code and, therefore, can only be used as a guiding document, not as a set of development requirements for projects that fall within its geographic scope. The project's consistency with the guiding provisions of the Land Use Plan are detailed above. The project would not prejudice the City in its preparation of a local coastal program as it is consistent with other Coastal-jurisdiction projects recently approved by the Coastal Commission in the area including the 26-foot tall, 3,695-square foot single-family dwelling at 1305 W Paseo del Mar; the 26-foot tall, 3,548-square foot single-family dwelling at 1307 W Paseo del Mar; and the 21-foot tall, 2,328-square foot single-family dwelling at 1355 W Paseo del Mar. In its staff report for the project located at 1307 W Paseo del Mar, the Coastal Commission found no substantial issue in regards to the 26-foot height of the residential dwelling. (Commission staff did recommend that substantial issue be found with respect to that project's consistency with the Coastal Act and the LUP policies related to geologic hazards and environmentally sensitive habitat areas as that development included the presence of the unpermitted stairways on the bluff face and soldier piles as a bluff protective device.) Accordingly, the proposed project's design has been guided by prior decisions of the California Coastal Commission.

In addition, as noted herein in historic preservation terms, a new structure constructed in proximity to a designated historic resource must be compatible but differentiated. This means the new building should respect the historic property's scale, massing, materials, and setting without imitating it or creating a false sense of historical development. In this case, a large modern house built directly behind the historic café would diminish the integrity and setting of the landmark by visually and spatially competing with its original context. Such an addition would be considered incompatible with the historic resource because it fails to preserve the café's historic character, feeling, and association—key aspects of its significance under the Secretary of the Interior's Standards for Rehabilitation.

Response: The proposed development's consistency with the Secretary of the Interior's Standards for Rehabilitation are adequately detailed in the memorandum prepared by Historic Resources Group on April 26, 2024. Two of the ten Secretary of the Interior Standards for Rehabilitation speak to the guidelines for new construction and its relationship to historic materials, Standards no.s nine and ten. Standard no. nine says "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." Standard no. ten says "New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."

In regards to the new construction's compatibility with the historic resource on the site, the Historic Memorandum reads: "In accordance with National Park Service guidance for related new construction, the proposed residential building will be located at the rear of Walker's Café,

13'-6" from the north (rear) façade of the Walker's Café building. The height and mass of the proposed residential building will be located behind the Walker's Café building away from its primary south-facing façade. The residential building will be located at the rear of Walker's Café, maintaining a 13'-6" distance between the rear façade of the Walker's Café Building and the residential building's southern facade.

In this way, the Walker's Café building will retain its visual prominence from the public right-of-way along Paseo del Mar or Pt. Fermin Park. The proposed new residential building will also be compatible in design and materials with the Walker's Café building by utilizing simple rectangular massing and smooth stucco cladding.

Construction of the residential building would not destroy any historic materials, features, or spatial relationships that characterize Walkers Cafe. The new building will be differentiated from Walker's Cafe and would be compatible with the historic materials, features, size, scale and proportion, and massing of the Walker's Cafe building. Thus, the Project would comply with Standard 9."

It goes on to say "The proposed residential building will be constructed as a separate and distinct structure, physically separated from the Walker's Café building by over 13 feet. The new residential building could be removed in the future without impairment to Walker's Café and the essential form and integrity of Walker's Café would be retained. Thus, the project would comply with Standard 10."

Therefore, as evaluated in the Historic Memorandum prepared by Historic Resources Group, the new single-family home and ADU would not diminish the integrity and setting of the landmark on the project site.

The roof decks are also out of character with the neighborhood and should be completely eliminated. The roof access structures, which are not shown in the renderings, would result in the appearance of a third story.

Response: Other homes in the area include roof decks including the single-family home and ADU located approximately 100 linear feet to the east at 670 Paseo del Mar and the single-family home approximately 750 feet to the northeast at 548 Shepard Street. Therefore, the inclusion of a roof deck is not out of character with the neighborhood. The applicant has agreed to include landscaping elements on the interior edges of the roof deck in order to honor the privacy of the adjacent properties. An updated plan set showing the location and type of vegetation is included in the attachments to this document.

Furthermore, none of the other properties in the neighborhood have the same condition as the subject property which includes a historic cafe structure in its front setback. The only way to grant open space areas for the enjoyment of the proposed homes' occupants is to allow roof decks on the proposed residential dwellings. Contrary to the appellant's claims, no roof access

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structures are intended for the proposed project. Stairs to access the roof decks are exterior and do not include roof access structures.

Also, the sheer amount of lot coverage is grossly incompatible with the surrounding neighborhood and a violation of the Coastal Act and LUP policies. Nothing is referenced and no evidence is provided in terms of the visual compatibility with the character of the surrounding area (page 33). Thus, the conclusion that the proposed project as conditioned will not impact scenic resources in the area is conclusory and not based on substantial evidence; this finding is erroneous.

Response: As stated above, the proposed project's amount of lot coverage is consistent with the surrounding neighborhood. The chart below shows the amount of lot coverage as a percentage of the total lot area for the surrounding sites.

With the exception of 710 W Paseo del Mar, which is only developed with a 741.88-square foot garage at the rear of the property, lot coverages for the surrounding neighborhood range from 18.69% to 48.09%, consistent with the proposed project's 33.20% residential lot coverage (45.19% when the cafe is included in the lot coverage calculation).

Address	SFD or MF	Year Built	DBS Height	No. of Stories	Building Footprint ³	Lot Size ⁴	Lot Coverage		
720 W PDM	SFD	1916	17	1	2009.33	6499.011	30.92%		
730 W PDM	SFD	1921	17	1	2324.32	6510.664	35.70%		
690 W PDM	SFD	1929	18	1	2581.85	6138.44	42.06%		
680 W PDM	SFD	1946	13	1	1147.54	6138.402	18.69%		
710 W PDM ⁵	-	1951	12	1	741.88	6120.199	12.12%		
740 W PDM	MF	1962	33.7	3	4406.43	6510.681	67.68%		
741 W SHEPARD, 746 W PDM ⁶	MF	1989	27.8	2	7890.04	16407.625	48.09%		
670 W PDM	SFD + ADU	2005	26	2	4189.36	12,952.50	32.34%		
700 W PDM	SFD + ADU	2027	21	2	2038	6138.461	33.20%	45.19%	with Cafe

³ Building footprint data gathered from NavigateLA.

⁴ Lot size data gathered from ZIMAS.

⁵ 710 W Paseo del Mar only includes a 741.88-square foot garage and no associated residential floor area.

⁶ Height records for 730 Paseo del Mar, 740 Paseo del Mar, and 741 W Shepard not available through LADBS; height information gathered through NavigateLA

Appeal Point 4 – The Approved Residential Structure is Incompatible With the Historic Resource and the Project Fails to Demonstrate Compliance With the Secretary of the Interior’s Standards

However, the “proposed rehabilitation,” as documented in the April 26, 2024 memorandum prepared by Historic Resources Group—an independent consultancy firm contracted by the applicant—refers only to the rehabilitation of the café, not to the new build or the total Project.

Response: The appellants claim that the residential structure is incompatible with the onsite historic resource and incompliant with the Secretary of the Interior’s Standards for Rehabilitation but fail to substantiate these claims with any studies or conclusions from a qualified historian meeting the Secretary of the Interior Professional Qualifications Standards. Their claims about the relationship between the new construction and the historic resource only rise to the level of opinionated conjecture. The City’s finding that “The proposed rehabilitation has been reviewed by the Office of Historic Resources and found consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, as documented in the April 26, 2024 memorandum prepared by Historic Resources Group,” is based on the Historic Memorandum prepared by a qualified architectural historian.

Further, the appellants’ claim that the memorandum prepared by Historic Resources Group only refers to the rehabilitation of the cafe and does not refer to the new build or total project is incorrect. The memorandum refers to the total project, including the relationship between the new construction and existing historic building, many times throughout the document.

Appeal Point 5 -- The Project Reduces Operational Viability of the Historic Café

Response: Although the operational viability of the cafe is not a required finding for the approval of the proposed project, it should be noted that the property owner is going to great lengths in order to further the rehabilitation and continued function of Walker’s Cafe. The owner/applicant is pursuing the following measures to assure the successful operation of the historic cafe:

- (1) Hiring an ADA consultant and an ABC consultant in order to inform the physical rehabilitation efforts associated with refurbishing the cafe structure in compliance with current ADA health code standards as much as possible while still maintaining internal and external elements germane to its historic designation.
- (2) Proposing the construction of a single-family residential dwelling along with an accessory dwelling unit to help support the financial feasibility of rehabilitating and operating the historic cafe.
- (3) Proposing the addition of an outdoor rear seating area as well as seating in the public right-of-way in front of the building to increase the cafe’s financial operational viability.

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The efforts to rehabilitate and operate Walker's Cafe are consistent with California Coastal Act provisions, specifically Section 30213, which requires that "lower-cost visitor and recreational facilities be protected, encouraged, and, where feasible, provided to ensure equitable access to the coast for all income levels."

It is also worth noting that, as a condition of the project's approval, the Zoning Administrator has specified that no expansion of the cafe's existing floor area is authorized. Therefore, the appellant's assertion that the rear seating area prevents the cafe's expansion is immaterial. A floor plan showing the proposed locations of the residential and commercial trash locations is included in this document's attachments. Deliveries to the cafe will happen in the existing driveway along the eastern edge of the property.

Appeal Point 6 – The Project Fails to Conform With Coastal Act Section 30252

Coastal Act Section 30252 Maintenance and Enhancement of Public Access: The location and amount of new development should maintain and enhance public access to the coast by...providing adequate parking facilities or providing substitute means of serving the development with public transportation...

The applicant states that they would continue to use the existing visitor-serving parking for Point Fermin Park to service their significantly expanded restaurant, reducing existing public parking that serves the park and its amenities.

Response: As a historic use that is not expanding its floor area (based upon the definition of floor area found in LAMC Section 12.03), the cafe is not required to propose additional parking. Walker's Cafe is intended to be a small, intimate, convenient location for refreshments for local community members and visitors to the local coastal resources including Point Fermin Park. As stated above, the Land Use Plan was never codified into the Los Angeles Municipal Code and, therefore, can only be used as a guiding document, not as a set of development requirements for projects that fall within its geographic scope. The LAMC provides the basis for evaluating the project's consistency with applicable requirements and regulations and, under the provisions of the LAMC, uncovered outdoor dining areas are not considered floor area and, therefore, do not require the provision of parking associated with floor area.

As noted in Appeal Finding 11 below, as per page 18 of the City determination "Applicant's last statement" the applicant's representative, Elisa Paster, agreed to exclude alcohol service from the front sidewalk patio. That change must be reflected in the determination's conditions.

Response: The applicant team is in agreement that alcohol service be excluded from the seating proposed in the public right-of-way and that this become a condition of the project's approval.

Appeal Point 7 – The Project Fails to Conform With Coastal Act Section 30253 Coastal Act Section 30253 Minimization of Adverse Impacts:

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New development shall do all of the following... Minimize risks to life and property...Minimize energy consumption and vehicle miles traveled, and Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Given the constrained access around the structures, including the lack of a front or rear yard for the residential structure, there are serious safety concerns with respect to emergency access and circulation and safety and Fire Department operations, including crowded or enclosed spaces adjacent to occupied uses, and site layout.

Response: The appellants claim that the development lacks a front and rear yard, however, this is untrue. The front yard setback for the single-family dwelling is 40'-8" although, given the positioning of the historic structure, it is mostly occupied by the cafe and its proposed rear seating area. The single-family dwelling also observes a rear yard setback of 15 feet, as required by the applicable regulations.

The appellants also claim that emergency egress would be constrained although they provide no detailed or expert analysis to support this assertion. Based on the regulations within the California Building Code Section 1020, the minimum corridor width for most occupancies is 44 inches. For occupancy loads of less than fifty occupants, the minimum corridor width is 36 inches. The occupant load of the rear area, which is an area of 681 square feet, is 45.4 occupants (the occupant load factor for an assembly with tables and chairs is 15 net square feet per person). Therefore, the required minimum egress pathway is 36 inches. The existing paved driveway along the east side of the property maintains a width of ten feet - more than three times the size of the egress pathway required for the outdoor seating area proposed behind the cafe.

In addition, considering the significantly expanded service floor area to 73 seats (27 indoor seats and 46 outdoor seats, with 16 in the public right-of-way and 30 on the back patio), it is nonsensical to say the project minimizes vehicle miles traveled, given a large portion of the significantly increased number of patrons would drive there.

Response: As stated above, the historic cafe has never maintained parking associated with its use. The current owner's intent to operate it as a locally-serving location for refreshments directed toward the local community and visitors to the nearby coastal resources is consistent with Coastal Act Section 30213, which requires that "lower-cost visitor and recreational facilities be protected, encouraged, and, where feasible, provided to ensure equitable access to the coast for all income levels." Based on the cafe's small footprint and positioning in an area where visitors are already parking to visit nearby coastal resources, it is reasonable to expect that its patrons will combine their trip with a visit to Point Fermin Park, the Point Fermin Lighthouse, and/or Sunken City (which is currently closed).

The consultant team visited the area surrounding the subject site on Sunday, May 10, 2026 between 1:30pm and 3pm in order to observe the parking behavior and supply in the vicinity.

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Based on the consultant team's observations, the immediately surrounding streets have the capacity for a total of 157 parked vehicles in both marked and unmarked spaces. Of those 157 spaces, 122 were occupied, leaving capacity for an additional 35 vehicles during the mid-day weekend inventory (which also happened to be Mothers' Day, bringing a particularly high amount of visitors). Additional seasonal parking supply is provided in a City-owned parking lot on the northwest corner of Shepard and Gaffey Streets. A complete inventory of the parking supply surveyed is included in the attachments to this document.

Appeal Point 8 – The Project Fails to Conform With Coastal Act Section 30625(c)

Coastal Act Section 30625 (c) requires that “decisions of the [Coastal] commission, where applicable, shall guide local governments or port governing bodies in their future actions under this division.” The third example provided in the City determination (page 37, Finding 9), the 1355 W. Paseo del Mar development, occupies the same footprint as the existing structure prior to the remodel and retains the same square footage in the new structure. Thus, that project would lend support to the idea of having the proposed residential structure for this project occupy the same (or up to 10% more) footprint occupied by the existing garage structure in the rear of the property, freeing up much needed space to support Walker's, which should be the primary focus of this development. This idea is proposed herein.

Response: The Zoning Administrator's decision was guided by several previous decisions of the California Coastal Commission including the above-named project at 1355 W. Paseo del Mar (Application No. 5-18-0999) which is a 21-foot tall 2,328 square foot single-family home (similar in height and square footage to the proposed primary residence at the subject site); a project at 1307 W. Paseo del Mar (Application No. A-5-SNP-19-0154/5-20-0152) which is a 26-foot tall 3,548-square foot single family home with a 1,124-square foot roof deck and rear yard deck; and a project at 1305 Paseo del Mar (Application No. A-5-SNP-19-0136/5-20-0153). Furthermore, the Coastal Commission also approved a project at 670 W. Paseo del Mar (Application No. 5-03-351) which is a 26-foot tall (22.5 feet tall in the Coastal application) single-family residence with a roof deck and an accessory dwelling unit on top of a detached four-car garage. All of these projects are similar (or greater) in height and square footage to the proposed project which includes the construction of a 21-foot tall 3,523-square foot single-family home with an attached 1,070-square foot accessory dwelling unit and two roof decks (one for each proposed residence).

Appeal Point 9 -- Other Miscellaneous Findings:

State Mello Act (MEL) and State Housing Accountability Act (HCA): The existing garage formerly had a bathroom and kitchen area, where people lived for decades, and thus a residential structure is proposed for demolition. The Mello Act and Housing Accountability Act Compliance Reviews must consider the prior residential units and use, regardless of whether they were legally permitted as such.

Response: The site contains an existing 1,118-square foot garage that will be demolished in order to build the proposed new single-family dwelling and accessory dwelling unit. Based on

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the 1928 building permit application (included in the attachments), the building was permitted as a garage. The garage has not been used as a dwelling unit and, therefore, does not require an affordable replacement dwelling unit according to the *Interim Administrative Procedures for Complying with the Mello Act in Coastal Zone Portions of the City of Los Angeles* (the Mello Act IAP).

As is stated in the project's Letter of Determination issued by the Zoning Administrator on April 1, 2026, "Pursuant to Part 2.4.2 of the Interim Administrative Procedures, developments which consist of nine or fewer Residential Units are Small New Housing Developments and are categorically exempt from the Inclusionary Residential Unit requirement. Therefore, the proposed development of two new Residential Units is found to be categorically exempt from the Inclusionary Residential Unit requirement for New Housing Developments."

Even if the garage was once used as a dwelling unit (for which there is no evidence), it certainly has not been used as a dwelling unit within the past year. According to the Mello Act IAP, "A Residential Unit shall not be classified as an Affordable Existing Residential Unit if it has been unoccupied for more than 365 consecutive days prior to the Application's filing." Therefore, the Letter of Determination's conclusion that an affordable replacement unit is not required for the proposed residential development is correct.

Given that the vehicle inspection pit where the Jitneys were serviced still exists in the garage, although records from that time are sparse, it's reasonable to conclude that they also refueled their vehicles there. Also, before you to consider is a CEQA exemption. Considering that there were likely a great deal of contaminants dispersed into the ground where vehicles were serviced and likely refueled, exempting the project from CEQA where a very large residential structure is proposed to be built upon a likely contaminated area would likely be in violation of CEQA, and, at a minimum, a detailed and thorough soil analysis must be required and performed before any such exemption from CEQA for the construction of the residential structure would be granted.

Response: The project is eligible for three CEQA exemptions including: a Class 1 exemption (for modifications to existing facilities), a Class 3 exemption (for the construction of small structures), and a Class 31 exemption (for the rehabilitation and restoration of historical resources). Under CEQA Guidelines Section 15300.2., "these exemptions are considered to apply [in] all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies." Specifically, "A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code."

The site is not included on any map or list compiled pursuant to Section 65962.5 of the Government Code. Maps from the State's GeoTracker and EnviroStor websites showing that the site is not considered a hazardous waste site are included as attachments to this document. Furthermore, a Geotechnical Investigation was completed by Applied Soil Technology, Inc. and

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their findings and recommendations documented in a report dated January 5, 2024. No indications of soil contamination are documented in their report. Therefore, there is no evidence to support the appellants' contention that there are soil contaminants dispersed within the ground of the subject site.

It should be noted that there is no evidence of an inspection pit currently existing within the garage. A conclusion that the garage was used for vehicle maintenance is conjectural.

Appeal Point 10– Procedural Errors With Respect to Neighborhood Council Role and Involvement

Response: This section does not pertain to the project applicant and is a matter of the City's compliance with procedural regulations.

Appeal Point 11 -- Other Miscellaneous Errors that Must Be Corrected:

A. Zone Variance/Café Operations Errors

1. *Condition 12. (page 7) Official California State lottery games and machines must not be allowed as it is incongruous with the stated nature of the use. This appears to be boilerplate language that was not correctly tailored to Walker's.*

Response: This is, indeed, boilerplate language for all new permits related to alcohol service in the City of Los Angeles and should remain as written.

2. *Condition 14. (page 7) Camera surveillance system must not include any footage of the adjacent properties.*

Response: The project team is in agreement with this.

3. *Condition 17. (page 7) References to "store" are incorrect.*

Response: The project team is in agreement with this.

4. *Conditions 20. and 22. (page 8) are erroneous. There are no parking areas under the control of the applicant.*

Response: According to Condition 11, "Parking shall be provided in compliance with the Municipal Code and to the satisfaction of the Department of Building and Safety." This condition should remain as written.

5. *Condition 30. (page 9) Must be revised to be clear there is no sound system or amplified or acoustic music allowed. (see Conditions 35. & 36.)*

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Response: Condition 30. only strengthens the prohibitions of amplified music and live entertainment contained in Conditions 35. and 36. and describes the implementation mechanism.

6. *Condition 31. (page 9) Private events must not be allowed in this residential area.*

Response: The appellant provides no justification for a prohibition of private events. This condition should remain, as written.

7. *Page 15—The statement that “the café has previously sold beer and wine for on-site consumption since 1997, as indicated on their ABC License No. 329702.” is erroneous. The café never sold wine, only beer. As indicated on page 21—“Records from the California Department of Alcoholic Beverage Control indicate that a Type 40 (On-Sale Beer) license has been active at the subject property since July 21, 1997.” Thus, only beer use can be perpetuated in the Zone Variance.*

Response: It is correct that the type of alcohol license issued to the existing cafe use is a Type 40, which only permits the sale of beer for on-site consumption. This should be corrected.

However, the applicant seeks to expand this to both beer and wine under the current Zone Variance application.

8. *Page 18 “Applicant’s last statement”—The applicant’s representative, Elisa Paster, agreed to exclude alcohol service from the front sidewalk patio, but that change is not reflected in the conditions and must be added.*

Response: The project team is in agreement with this.

9. *Page 19 “conditions for further consideration by the ABC”—The hours of operation indicated must be changed to 8 am to 8 pm.*

Response: The project team is in agreement with this.

10. *Page 23 Zone Variance Finding 2 “Continued Use of Existing Non-Conforming Historic Café”—The finding refers to a “corner-adjacent location;” however, the project is not on or adjacent to a corner.*

Response: The project team is in agreement with this. This is not a corner-adjacent property. This finding should be corrected.

11. *Page 27 Zone Variance Finding 4—2023 crime statistics must be updated to latest year available—2025.*

Response: According to crime statistics for the year 2025 106 crimes were reported in San Pedro and none of them were for violations to liquor laws, drunkenness, disturbing the peace, disorderly conduct, or gambling.

12. Page 28 Zone Variance Finding 5—The finding does not recognize the fact that the LUP is a part of the General Plan. The project (both residential and café portions) does not meet the San Pedro Community Plan Goal LU1.1: Neighborhood character. Maintain the distinguishing characteristics of San Pedro’s residential neighborhoods with respect to lot size, topography, housing scale and landscaping, to protect the character of existing stable neighborhoods from new, out-of-scale development.” As is proven herein, this total project is out-of-scale development. Neither does the project comply with LU1.3 Neighborhood transitions, LU1.6 Alleys, or LU6.2 Mix of Uses.

Response: The San Pedro LUP was never codified into the City’s municipal code and, therefore, can be used as a guiding document but not a set of requirements by which projects are beheld.

As discussed above, the neighborhood contains a mix of structure heights ranging from 12 to approximately 33 feet. The proposed residential structure is 21 feet in height, consistent with the surrounding neighborhood. The site’s location across the street from Point Fermin Park (Open Space zoning) and multi-family residential developments creates a transitional context further enhanced by the structure’s proposed height.

The proposed residential structure will be solely accessible by its rear alley, with its automobile and pedestrian entrances oriented toward the rear of the site, consistent with the San Pedro Community Plan goal LU1.6 which encourages the use of “alleys as an alternative, safe, well maintained vehicular access to homes that reduces curb cuts, driveways, and associated pedestrian-automobile conflicts along sidewalks.”

The Project includes the rehabilitation of an existing non-conforming historic cafe as well as the construction of two new residential units - one single-family dwelling and one accessory dwelling unit - on a lot adjacent to other residential uses co-located with public-facing Coastal resources. The mix of uses proposed for the lot are consistent with San Pedro Community Plan LU6.2 which encourages “integration of a complementary mix of commercial, service and other non-residential uses that address the needs of households living in urban neighborhoods.” Additionally, the proposed mix of uses is consistent with San Pedro Community Plan LU6.4 which states “Compatible “non-conforming uses” that are a recognized part of a neighborhood (e.g., “Mom and Pop” neighborhood stores), should be allowed to continue in accordance with applicable provisions of the Municipal Code.” As such, the project uses a Zone Variance to continue the non-conforming use of an existing, historic cafe, consistent with the provisions of the Municipal Code.

13. Page 31 Zone Variance Finding 5—“The ability to serve alcohol with entertainment” is incorrect as no entertainment is allowed.

Response: The project team is in agreement with this. The Finding should not include the words “with entertainment” as entertainment is prohibited by other parts of the Letter of Determination. This Finding should be updated accordingly.

B. Coastal Development Permit and Other Errors

1. CDP Condition 7.e. (page 5) is erroneous. Roof deck railings are required by the Department of Building and Safety to be a minimum of 42”.

Response: The project team is in agreement with this. The roof deck railing has been increased to 42” in height as shown in the attached elevations.

2. CDP Condition 7.h. (page 6) is erroneous. It is written incorrectly as the limit of 36” for the roof deck railings is only applicable to the extent the top of the railings exceed the specified height limit. The structure height including roof deck railings cannot exceed 26 feet plus 3 feet (36”) = 29 feet.

Response: The project team is in agreement with this. The roof deck railing has been increased to 42” in height as shown in the attached elevations.

3. Page 16 “Streets”—Paseo del Mar is a designated scenic highway as per the San Pedro Community Plan.

Response: This section of the Letter of Determination is seemingly only meant to state the designated and dedicated widths of the road’s right-of-way and roadway, which meet the requirements stated within Mobility Plan 2035.

San Pedro Community Plan LU18.4 reads “Turn-out and view site areas from Paseo del Mar shall provide unobstructed views of the ocean. All development seaward of the turn-out and view site areas of Paseo del Mar and Shepard Street shall be sited, designed and constructed so that public views to and along the ocean are protected to the maximum extent feasible. All development in this area, including public recreation and public works, shall be subordinate to their setting and minimize in height and bulk to the maximum extent feasible to accomplish view protection.”

The project site is not located seaward of any view site or turnout areas, nor does it obstruct any public views. Therefore, the project is compliant with this provision of the Community Plan.

4. Page 16 “Previous zoning related actions on the site”—It was not the applicant who submitted the Historic-Cultural Monument nomination for Walker’s Café, but a member of the public.

Response: The project team is in agreement with this statement. The property had not transferred to the current owner at the time that the Historic-Cultural Monument nomination

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application was submitted, however, they are complying with all regulations related to the designation.

5. Page 20 “conditions for further consideration by the ABC” —although we agree some parking should be designated, no parking is being provided.

Response: The Letter of Determination states that “Final approval of the number and location of parking is subject to review and approval by the Department of Building and Safety. (Coastal Development Permit Condition 7.f.). The project has not completed the Department of Building and Safety review. This condition should remain as written.

6. Page 35 CDP Finding 7 —It should be noted that although the LUP is advisory but its policies and standards must be followed unless there is a legally sufficient, factbased and significant reason or special condition why it cannot be followed (based on case law—Pacific Palisades Bowl Mobile Estates, LLC v. City of Los Angeles and Douda v. California Coastal Commission).

Response: The project is compliant with the goals and objectives of the San Pedro LUP (as detailed above). According to the Los Angeles Department of City Planning, the LUP was never codified into the Los Angeles Municipal Code and, therefore, can only be used as a guiding document, not as a set of development requirements for projects that fall within its geographic scope.

Appeal Point 12 – The Project is Not Exempt from CEQA and Requires Additional Environmental Analysis

Response: This appeal point is addressed supra.

Conclusion:

Given the responses above, the 700 Paseo del Mar project team requests that the Harbor Area Planning Commission affirm the findings made by the Zoning Administrator regarding Planning Case No. ZA-2023-7218-ZV-CDP-MEL-HCA and deny the appeal in its entirety.

Attachments

- Attachment A - LARIAC Methodology Correspondence
- Attachment B - Available Building Permits for Nearby Structures
- Attachment C - Updated Project Plans
- Attachment D - Project Team Parking Inventory (May 10, 2026)
- Attachment E - 700 Paseo del Mar Garage Permit (1928) and Signed Mello Screening Advisory Checklist
- Attachment F - 700 Paseo del Mar GeoTracker and EnviroStor Search Results and Current Photos of Garage (May 26, 2026)



Jesi Harris <jesi@bsilveira.associates>

LARIAC Height Methodology

12 messages

Jesi Harris <jesi@bsilveira.associates>

Fri, May 15, 2026 at 12:05 PM

To: SSteinberg@isd.lacounty.gov, adang@isd.lacounty.gov

Hi, Steven and An,

I work with a land use consulting firm based in Los Angeles. We often use LARIAC data in the findings for projects, specifically the height data.

I have a couple of questions about how height is measured in your system.

(1) What is the ground elevation used in your height data? Does it use the lowest grade on the property or an average site grade calculation?

(2) My understanding is that the height is measured to the highest point on the building so if, there are any rooftop elements like HVAC or guardrails, those get captured in the overall height calculation. Is that correct?

Thank you, in advance, for your assistance. Feel free to call me at the number in my signature if it's easier to discuss any of this over the phone.

Best,
Jesi

--

Jesi Harris

Sr Project Manager + Partner

M: 704.277.7332

Brian Silveira & Associates | Venice, California | bsilveira.associates

Jesi Harris <jesi@bsilveira.associates>

Wed, May 20, 2026 at 11:30 AM

To: SSteinberg@isd.lacounty.gov, adang@isd.lacounty.gov

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

Hi, Steven and An,

Following up on these questions from last week. For the LARIAC height measurement methodology:

(1) What is the ground elevation used in your height data? Does it use the lowest grade on the property or an average site grade calculation?

(2) My understanding is that the height is measured to the highest point on the building so if, there are any rooftop elements like HVAC or guardrails, those get captured in the overall height calculation. Is that correct?

Thanks for your help.

Best,
Jesi

[Quoted text hidden]

Steve Steinberg <SSteinberg@isd.lacounty.gov>

Wed, May 20, 2026 at 12:53 PM

To: Jesi Harris <jesi@bsilveira.associates>, David Alexander <david.alexander@eagleview.com>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>, An Dang <ADang@isd.lacounty.gov>

Jesi,

It was nice talking with you. As I'm not exactly sure of the details of the methods used by our vendor (EagleView) to assign the base and peak heights of the buildings in the LARIAC data I'm looping in David Alexander, our technical representative from the company. David should be able to provide you with information on the specific methodology used.

Separately it strikes me that if you have the capability to work with lidar, there is a lidar point cloud that we collected in the fall of 2023 that's available via the USGS lidar explorer website. That would be another potential means to developing your own heights should our LARIAC data not suffice for your needs.

Take care,

Steve

Steven J. Steinberg, Ph.D., MPA, GISP
Geospatial Information Officer (GIO)
LARIAC Program Director
County of Los Angeles



Physical Address:

ITS Shared Services Branch
Internal Services Department
9150 E. Imperial Hwy, MS#3
Downey, CA 90242
33.916650, -118.132255

Telecomm:

(O) 562-955-3756
(C) 562-419-4138
(E) SSteinberg@isd.lacounty.gov
www.linkedin.com/in/sjsteinberg
[Book time with Steve Steinberg](#)

From: Jesi Harris <jesi@bsilveira.associates>
Sent: Wednesday, May 20, 2026 11:30 AM
To: Steve Steinberg <SSteinberg@isd.lacounty.gov>; An Dang <ADang@isd.lacounty.gov>
Cc: Kevin Scott <kevin@bsilveira.associates>; Brian Silveira <brian@bsilveira.associates>
Subject: Re: LARIAC Height Methodology

CAUTION: External Email. Proceed Responsibly.

[Quoted text hidden]

Jesi Harris <jesi@bsilveira.associates>
To: Steve Steinberg <SSteinberg@isd.lacounty.gov>
Cc: David Alexander <david.alexander@eagleview.com>, Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>, An Dang <ADang@isd.lacounty.gov>

Wed, May 20, 2026 at 1:08 PM

Thank you for the introduction, Steve!

Hi David,

Steve mentioned you can speak to the methodology EagleView methodology for the LARIAC height data, specifically regarding ground elevation (lowest grade vs. average site grade) and how rooftop elements are captured in the overall height.

Could you let me know how your methodology handles the following two questions:

(1) What is the ground elevation used in your height data? Does it use the lowest grade on the property or an average site grade calculation?

(2) My understanding is that the height is measured to the highest point on the building so if, there are any rooftop elements like HVAC or guardrails, those get captured in the overall height calculation. Is that correct?

Best,
Jesi

[Quoted text hidden]

David Alexander <david.alexander@eagleview.com>

Wed, May 20, 2026 at 1:12 PM

To: Jesi Harris <jesi@bsilveira.associates>, Steve Steinberg <SSteinberg@isd.lacounty.gov>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>, An Dang <ADang@isd.lacounty.gov>

Hello Jesi,

Sure thing:

(1) What is the ground elevation used in your height data? Does it use the lowest grade on the property or an average site grade calculation?

- The ground elevation would be the same elevation data that we used to process the imagery. In this case it was a mix of 2015 LiDAR, DSM work; the AT team also sources other recent publicly available elevation data to help out with problem areas. Mostly they stick to 3DEP if needed

(2) My understanding is that the height is measured to the highest point on the building so if, there are any rooftop elements like HVAC or guardrails, those get captured in the overall height calculation. Is that correct?

-(From Lariac SOW): Each enclosed building representation polygon shall contain two "z" (elevation) attributes representing the highest point on the building (building height above ground and mean sea level), excluding flagpoles, chimneys, and other features smaller than 4 square feet.

I'm aware that the SOW does not indicate which point on the ground it's measuring off though; I am currently asking around to see if I can get an answer for you.

Thanks,



David Alexander

Technical Account Manager

(408) 838-2831

david.alexander@eagleview.com

www.eagleview.com

From: Jesi Harris <jesi@bsilveira.associates>

Sent: Wednesday, May 20, 2026 1:08 PM

To: Steve Steinberg <SSteinberg@isd.lacounty.gov>

Cc: David Alexander <david.alexander@eagleview.com>; Kevin Scott <kevin@bsilveira.associates>; Brian Silveira <brian@bsilveira.associates>; An Dang <ADang@isd.lacounty.gov>

Subject: Re: LARIAC Height Methodology

You don't often get email from jesi@bsilveira.associates. [Learn why this is important](#)

[Quoted text hidden]

Jesi Harris <jesi@bsilveira.associates>

Wed, May 20, 2026 at 1:33 PM

To: David Alexander <david.alexander@eagleview.com>

Cc: Steve Steinberg <SSteinberg@isd.lacounty.gov>, Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>, An Dang <ADang@isd.lacounty.gov>

Thank you, David!

I really appreciate your help. From your response, I understand that you measure to the highest point of the enclosed building excluding features shorter than 4 feet in height.

And for the ground elevation, you use data from the 3D Elevation Program generated by the United States Geological Survey. You'll get back to me on whether this is the average existing grade on the property, the lowest grade on the property, or the highest grade on the property.

Let me know if I got any of that wrong and thanks again for your assistance. It really means a lot.

Best,
Jesi

[Quoted text hidden]

Jesi Harris <jesi@bsilveira.associates>

Thu, May 21, 2026 at 12:28 PM

To: David Alexander <david.alexander@eagleview.com>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

Hi, David,

Just following up to see if you have any updates on that remaining question about how ground height elevation is measured.

Thanks,
Jesi

[Quoted text hidden]

David Alexander <david.alexander@eagleview.com>

Thu, May 21, 2026 at 1:24 PM

To: Jesi Harris <jesi@bsilveira.associates>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

Hi Jesi,

Nothing yet. I'll let you know when I find out.

Thanks,



David Alexander

Technical Account Manager

(408) 838-2831

david.alexander@eagleview.com

www.eagleview.com

From: Jesi Harris <jesi@bsilveira.associates>

Sent: Thursday, May 21, 2026 12:28 PM

To: David Alexander <david.alexander@eagleview.com>

Cc: Kevin Scott <kevin@bsilveira.associates>; Brian Silveira <brian@bsilveira.associates>
Subject: Re: LARIAC Height Methodology

[Quoted text hidden]

David Alexander <david.alexander@eagleview.com>

Fri, May 22, 2026 at 7:27 AM

To: Jesi Harris <jesi@bsilveira.associates>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

Good morning, Jesi,

I've got another update for you regarding building height methodology.

"Since the terrain inside the building is obscured, ground elevation is measured from the clearly visible area outside the Building polygon (Nearest to the Building).

Ground elevation is ideally measured at the driveway connected to the building. If a connected driveway is unavailable, measurements are taken from the visible ground area adjacent to the structure. For buildings constructed on hills or slopes, the elevation is determined by averaging the surrounding ground elevations."

Hope this helps!



David Alexander

Technical Account Manager

(408) 838-2831

david.alexander@eagleview.com

www.eagleview.com

From: David Alexander <david.alexander@eagleview.com>

Sent: Thursday, May 21, 2026 1:24 PM

To: Jesi Harris <jesi@bsilveira.associates>

[Quoted text hidden]

[Quoted text hidden]

Jesi Harris <jesi@bsilveira.associates>

Fri, May 22, 2026 at 8:51 AM

To: David Alexander <david.alexander@eagleview.com>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

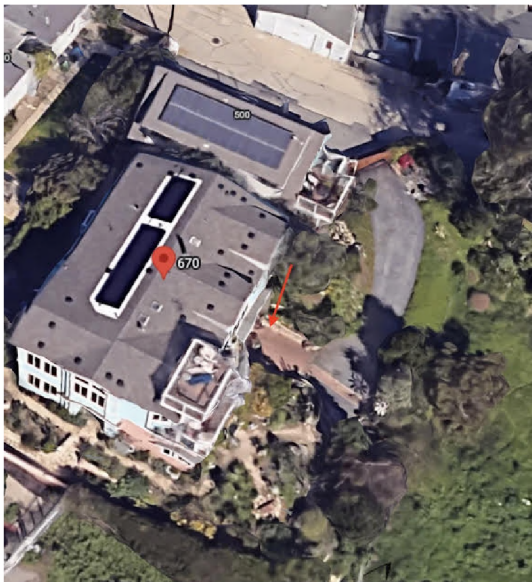
Thank you so much for the update, David.

If I understand correctly, the ground elevation is generally taken from the portion of the driveway nearest the building, correct?

If there's no driveway, then a point adjacent to the structure is selected. Is there any guideline that determines which visible ground area adjacent to the structure is used?

And for buildings on slopes or hillsides, the average natural grade is used. That seems pretty clear.

So, for example, for the house in the photo below (670 W Paseo del Mar), the portion of the driveway indicated by the red arrow was used as the ground elevation?



But for this house (2427 Michigan Ave), since there's no driveway, which ground elevation point would be used?



Thanks,
Jesi

[Quoted text hidden]

David Alexander <david.alexander@eagleview.com>

Fri, May 22, 2026 at 10:30 AM

To: Jesi Harris <jesi@bsilveira.associates>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

Hi Jesi,

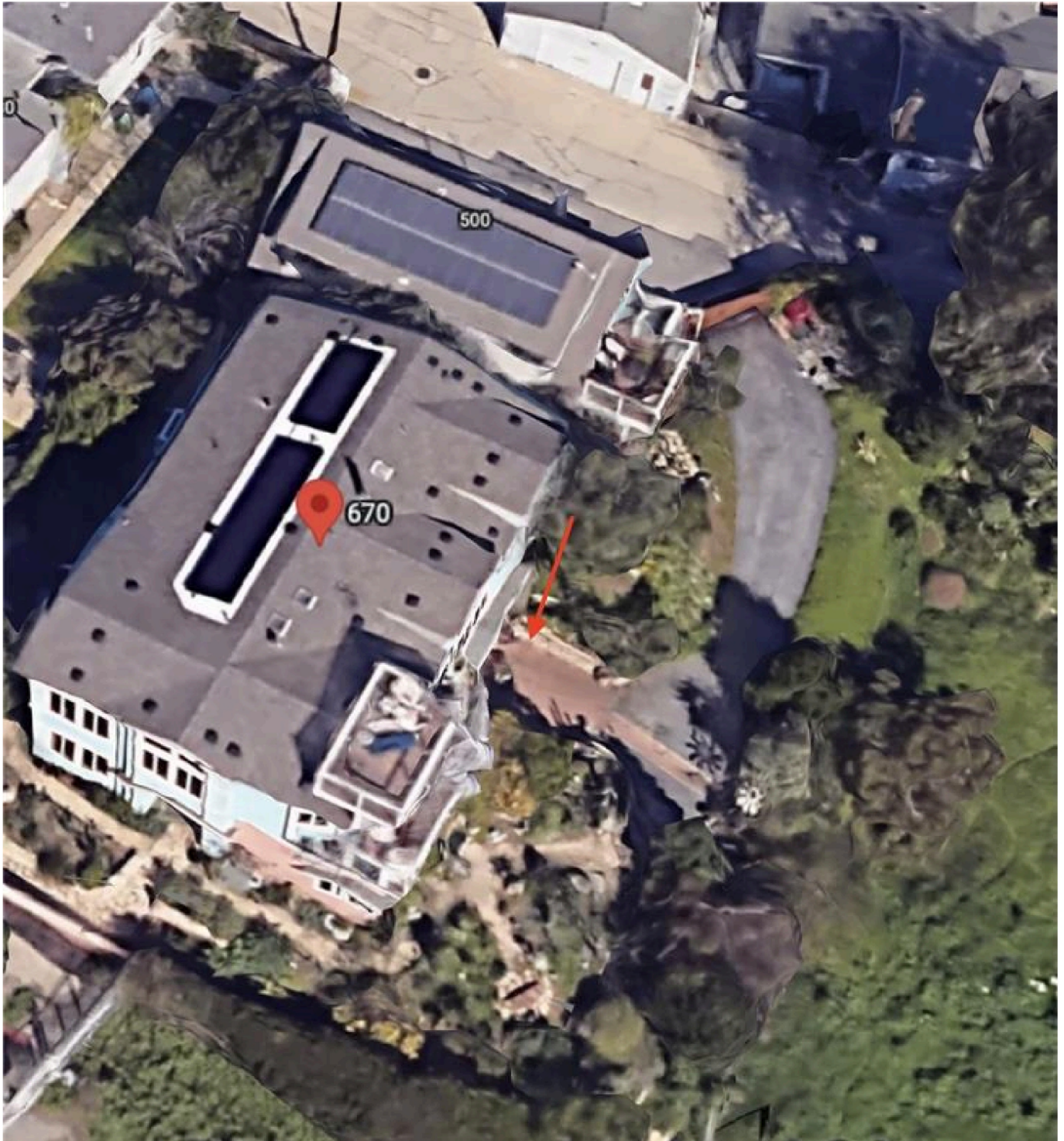
"If I understand correctly, the ground elevation is generally taken from the portion of the driveway nearest the building, correct?

Yes that is correct

If there's no driveway, then a point adjacent to the structure is selected. Is there any guideline that determines which visible ground area adjacent to the structure is used?

We look for the any flat surface (ex : walkway or patio)

So, for example, for the house in the photo below (670 W Paseo del Mar), the portion of the driveway indicated by the red arrow was used as the ground elevation?



Yes , In the above case we will take the ground elevation from driveway part (Red Arrow).

But for this house (2427 Michigan Ave), since there's no driveway, which ground elevation point would be used?"



In this case we will use walkway for the correct ground elevation.



David Alexander
Technical Account Manager
(408) 838-2831
david.alexander@eagleview.com
www.eagleview.com

From: Jesi Harris <jesi@bsilveira.associates>

Sent: Friday, May 22, 2026 8:51 AM

[Quoted text hidden]

[Quoted text hidden]

Jesi Harris <jesi@bsilveira.associates>

Fri, May 22, 2026 at 12:20 PM

To: David Alexander <david.alexander@eagleview.com>

Cc: Kevin Scott <kevin@bsilveira.associates>, Brian Silveira <brian@bsilveira.associates>

I really appreciate your responsiveness to all of my questions. Thank you, David!

Have a wonderful weekend!

Best,

Jesi

[Quoted text hidden]

Attachment B

Surrounding Property Data and Building Permits

[illegible]

3

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY
BUILDING DIVISION

Application to Alter, Repair, Move or Demolish

To the Board of Building and Safety Commissioners of the City of Los Angeles:

Application is hereby made to the Board of Building and Safety Commissioners of the City of Los Angeles, through the office of the Superintendent of Building, for a building permit in accordance with the description and for the purpose hereinafter set forth. This application is made subject to the following conditions, which are hereby agreed to by the undersigned applicant and which shall be deemed conditions entering into the exercise of the permit:

First: That the permit does not grant any right or privilege to erect any building or other structure therein described, or any portion thereof, upon any street, alley or other public place or portion thereof.

Second: That the permit does not grant any right or privilege to use any building or other structure therein described, or any portion thereof, for any purpose that is, or may hereafter be prohibited by ordinance of the City of Los Angeles.

Third: That the granting of the permit does not affect or prejudice any claim of title to, or right of possession in, the property described in such permit.

REMOVED FROM

REMOVED TO

Lot..... Lot.....

Tract..... Tract.....

Present location of building } 555 Paseo del Mar. (House Number and Street)

New location of building } 728 Paseo del Mar. (House Number and Street)

Between what } streets

Approved by
City Engineer.

Deputy.

1. Purpose of PRESENT building dwelling Families 1 Rooms 5
(Store, Residence, Apartment House, Hotel, or any other purpose)

2. Use of building AFTER alteration or moving same Families 1 Rooms 5

3. Owner (Print Name) Mrs. Chas Adair. Phone 2154

4. Owner's Address 128 1/2 W. 6th. St

5. Certificated Architect William F. Durr, State License No. 1169 Phone 2154

6. Licensed Engineer State License No. Phone

7. Contractor John Berglund, State License No. 014743 Phone 4422

8. Contractor's Address 1216 N. 6th.

9. VALUATION OF PROPOSED WORK {Including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and/or elevator equipment therein or thereon} \$ 500.00

10. State how many buildings NOW } 1 on lot and give use of each. (Residence, Hotel, Apartment House, or any other purpose)

11. Size of existing building 28x40 Number of stories high 1 Height to highest point 17

12. Class of building D Material of existing walls Wood Exterior framework Wood (Wood or Steel)

Describe briefly and fully all proposed construction and work:

Move a one story frame residence from Point Firmin crack.

THIS IS EMERGENCY AS THIS BUILDING IS SLOWLY MOVING TOWARD THE OCEAN

Fill in Application on other Side and Sign Statement

(OVER)

PERMIT NO. 17999	FOR DEPARTMENT USE ONLY				Fee 3.50 Stamp here when Permit is issued MAY 8 1940 Inspector 11119
	Plans and Specifications checked	Zone C1	Fire District No. 220		
	Corrections verified	Bldg. Line 220 Ft.	Street Widening 220 Ft.		
	Plans, Specifications and Applications rechecked and approved	Application checked and approved		Clerk	
PLANS	For Plans See	Filed with	Required Valuation Included	SPRINKLER Specified Fee-No	

PLANS, SPECIFICATIONS, and other data must be filed if required.

NEW CONSTRUCTION

Size of Addition.....x.....Size of Lot.....x.....Number of Stories when complete.....
Material of Foundation.....Concrete.....Width of Footing.....12".....Depth of footing below ground.....6"
Width Foundation Wall.....6".....Size of Redwood Sill.....6".....Material Exterior Walls.....
Size of Exterior Studs.....x.....Size of Interior Bearing Studs.....x.....
Joists: First Floor.....x.....Second Floor.....x.....Rafters.....x.....Roofing Material.....
I have carefully examined and read both sides of this completed Application and know the same is true and correct and hereby certify and agree, if a Permit is issued, that all the provisions of the Building Ordinances and State Laws will be complied with whether herein specified or not; also certify that plans and specifications, if required to be filed, will conform to all of the provisions of the Building Ordinances and State Laws.

Sign Here.....
(Owner or Authorized Agent)

By.....

FOR DEPARTMENT USE ONLY			
Application.....	Fire District.....	Bldg. Line.....	Termite Inspection.....
Construction.....	Zoning.....	Street Widening.....	Forced Draft Ventil.....

(1) **REINFORCED CONCRETE**

Barrels of Cement.....
Tons of Reinforcing Steel.....

(2) The building (and, or, addition) referred to in this Application is, or will be when moved, more than 100 feet from Street.....

Sign Here.....
(Owner or Authorized Agent)

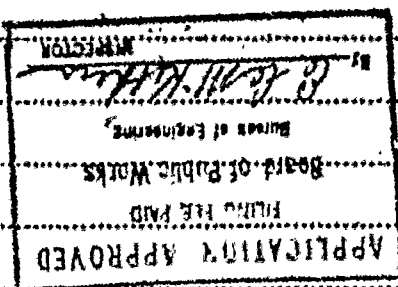
(3) No required windows will be obstructed.

Sign Here.....
(Owner or Authorized Agent)

(4) There will be an unobstructed passageway at least ten (10) feet wide, extending from any dwelling on lot to a Public Street or Public Alley at least 10 feet in width.

Sign Here.....
(Owner or Authorized Agent)

REMARKS:



1

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

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

Lot No. 16 & 17
Block 7
Tract Peck's Ocean View Tract
Location of Building 728 Paseo Del Mar, San Pedro
(House Number and Street)
Between what cross streets? GAFFEY AND CAROLINA

Approved by
City Engineer
Deputy.

USE INK OR INDELIBLE PENCIL

1. Purpose of building Private Garage Families 1 Rooms 1
(Store, Dwelling, Apartment House, Hotel or other purpose)
2. Owner Manuel P. Rodriguez Phone TE-31126
(Print Name)
3. Owner's Address 728 Paseo Del Mar P. O. San Pedro
4. Certificated Architect State License No. Phone
5. Licensed Engineer State License No. Phone
6. Contractor Findley Construction Company State 118668B-1 ME-38092
License No. Phone
7. Contractor's Address 8850 E. Compton Blvd., Paramount
8. VALUATION OF PROPOSED WORK [including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment therein or thereon.] \$ 800.00
9. State how many buildings NOW } 1 - Dwelling
on lot and give use of each. } (Store, Dwelling, Apartment House, Hotel or other purpose)
10. Size of new building 20 x 20 No. Stories 1 Height to highest point 12 Size lot 50 x 120
11. Material Exterior Walls Stucco Type of Roofing Comp
12. Buildings and similar structures } (a) Footing: Width 18" Depth in Ground 12 Width of Wall slab
(b) Size of Studs 2x4 Material of Floor concrete
(c) Size of Floor Joists concrete Size of Rafters 2x4

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

DISTRICT
OFFICE

SAN PEDRO

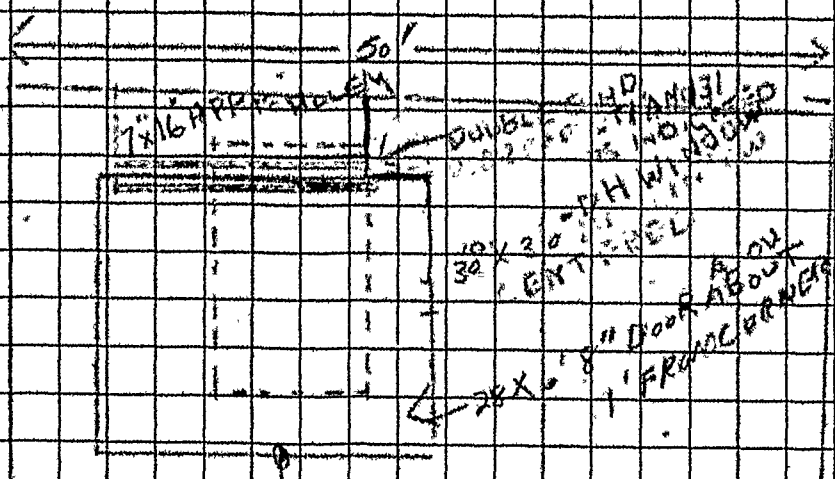
Sign here Jack R. Findley
(Owner or Authorized Agent)
By

FOR DEPARTMENT USE ONLY

PLAN CHECKING					
Valuation \$	\$		Investigation Fee \$		
Fee \$	\$		Bldg. Permit Fee \$		
TYPE I		Maximum No. Occupants	Key Lot	Lot Size	20 Ft. rear alley
GROUP R		Plans and Specifications checked	Corner Lot Keyed	Fire District	20 Ft. side alley
For Plans See		Correction Verified	Zone	No.	District Map No. 5014
Filed with		Plans, Specifications and Application rechecked and approved.	Bldg. Line	Street Widening	Application checked and approved
			Continuous Inspection	SPRINKLER Specified-Required Valuation Included Yes-No	Inspector

DO NOT WRITE BELOW THIS LINE

TYPE OF RECEIPT	DATE ISSUED	TRACER NO. (M)	RECEIPT NO.	CODE	FEE PAID
Plan Checking					
Supplemental Plan Checking					
Building Permit	JUL 19 1954		SP 8952		



← 10' →

← 5' →

2

APPLICATION TO RELOCATE BUILDING AND FOR CERTIFICATE OF OCCUPANCY

CITY OF LOS ANGELES

DEPT. OF BUILDING AND SAFETY

DIST. MAP 3-197	1. LEGAL FROM LOT Blk E. #15	TRACT 4362	TO LOT 14 Blk 7	TRACT Pecks-- Ocean View	APPROVED BS
ZONE C-1	2. PRESENT ADDRESS 1306 S. Ogden Drive				
FIRE DIST.	NEW ADDRESS 690 Paseo Del Mar				
INSIDE X	3. PRESENT USE OF BLDG. dwell.		USE AFTER RELOCATION same		
KEY COR. LOT	4. OWNER Valentine Partida		TE 25685		
REV. COR. 50 LOT SIZE 13.86x130	5. OWNER'S ADDRESS 681 Upland Avenue, San Pedro				
REAR ALLEY 20	6. CERT. ARCH OR LIC. ENG. c/o 1660 W. 139th St., Gardena		STATE LICENSE NUMBER		
SIDE ALLEY BLDG. LINE	7. CONTRACTOR owner		STATE LICENSE NUMBER		
AFFIDAVITS	8. SIZE OF BLDG. 36' x 65'-2"		STORIES 1		HEIGHT 18
BLDG. AREA	9. MATERIAL OF EXTERIOR WALLS:		☐ WOOD ☒ STUCCO ☐ METAL ☐ BRICK ☐ CONC. BLOCK ☐ CONCRETE		
SPRINKLERS REQ'D. SPECIFIED	10. NEW WORK (DESCRIBE).				

2

690 Paseo Del Mar

SP

VALIDATION: LA 38371				MAR-5-56	37674	B 15 - CK	30.00
TYPE V	GROUP R	MAX. OCC. 1-fam	MAR-19-56	40264	A - 1 CK	10.20	
DIST. OFFICE SAN PEDRO		DATE APPROVED 3-13-56		BOND \$3000.00		CASH BOND SURETY BOND	

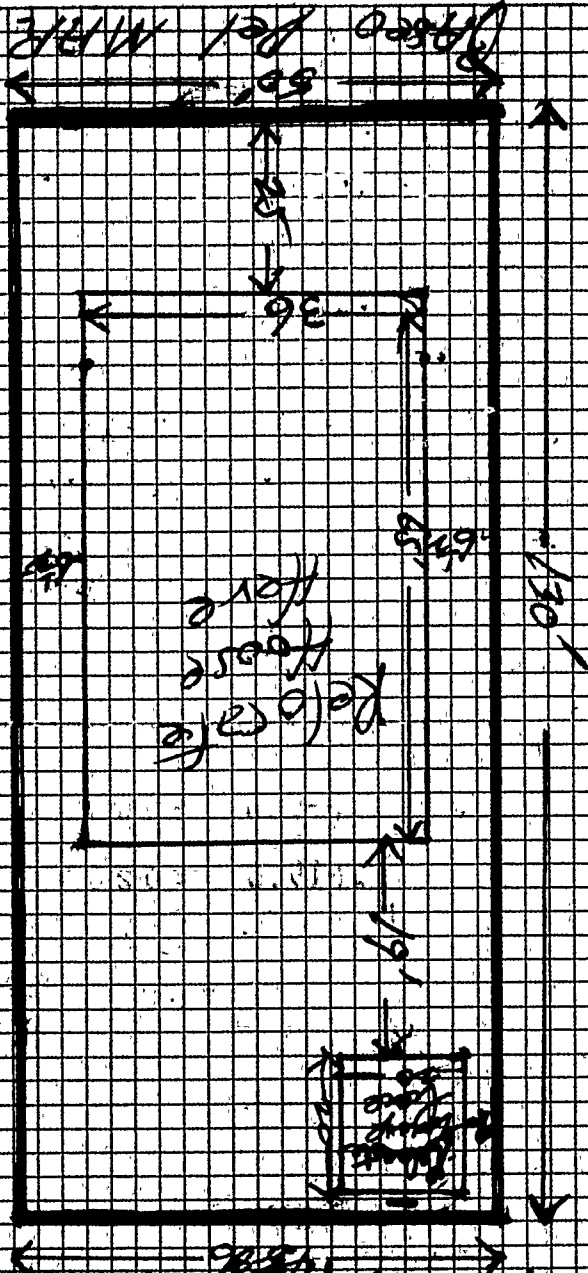
DWELL. UNITS	11. VALUATION: TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BLDG. \$ 2400.00	VALUATION APPROVED A. Gollig
PARKING SPACES	I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance. The issuance of this permit will not violate any deed restrictions of record. The purchase of either site or building for relocation purposes until this application is approved is at my own risk. This is an application only and does not guarantee approval. The building when relocated must be repaired so as not to be detrimental to property within 1000 feet of the new site. <i>Valentine Partida</i> MUST BE SIGNED BY OWNER	APPLICATION CHECKED Mutch
GUEST ROOMS		PLANS CHECKED
FILE WITH		CORRECTIONS VERIFIED
CONT. INSP.		PLANS APPROVED
SEWER CAP PER. 75081	This form when properly validated is a permit to do the work described.	APPLICATION APPROVED CK [Signature]
GRADING		FILE NUMBER 1009

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

LOT 14 TRACT BECKS

(Ocean view)

10' Alley



1

APPLICATION TO ERECT A NEW BUILDING

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

Lot No. 13 - Block M

Tract Pedro Ocean View SAN PEDRO

Location of Building 680 - Puro Del Mar
(House Number and Street)

Between what cross streets Corbin + Gaffney

Approved by
City Engineer
Deputy.

USE INK OR INDELIBLE PENCIL

- Purpose of building Dwelling Families 1 Rooms 3 + bath
(Store, Dwelling, Apartment House, Hotel or other purpose)
- Owner William M. Schacht Phone
(Print Name)
- Owner's address 429 - S. Chapman St. San Pedro
- Certificated Architect State License No. Phone
- Licensed Engineer State License No. Phone
- Contractor State License No. Phone
- Contractor's address

8. VALUATION OF PROPOSED WORK

Including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment therein or thereon.

\$ 1500.

- State how many buildings NOW on lot and give use of each. none
(Store, Dwelling, Apartment House, Hotel, or other purpose)
- Size of new building 20 x 20 No. Stories 13 Height to highest point 13 Size lot 50 x 130
- Material Exterior Walls Siding Type of Roofing Comp. Shingles
- For Accessory Buildings and similar structures
 - Footing: Width 12 Depth in Ground 12 Width of Wall 12 in
 - Size of Studs 2 x 4 Material of Floor Wood
 - Size of Floor Joists 2 x 6 Size of Rafters 2 x 4

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

Sign here William M. Schacht
(Owner or Authorized Agent)

Plans, Specifications and other data must be filed.

By _____

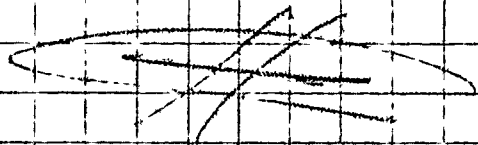
FOR DEPARTMENT USE ONLY

(1) PLAN CHECKING				(2) REINFORCED CONCRETE		(3) The building referred to in this Application will be more than 100 feet from _____ Street	
Receipt No. <u>86142</u>				Bbls. Cement _____		Sign here _____ (Owner or Authorized Agent)	
Valuation \$ <u>1500</u>				Tons of Reinforcing Steel _____			
Fee Paid \$ <u>3</u>							
TYPE	GROUP	Maximum No. Occupants	Inside Lot ☒ Corner Lot	Key Lot	Lot Size	28 Ft. rear alley	Clerk
				Corner Lot Keyed	<u>50 x 130</u>	_____ Ft. side alley	
PERMIT No. <u>86142</u>				Zone <u>C1</u>	Fire District No. <u>2</u>	District Map No. _____	
Plans and Specifications checked <u>Complete</u>				Blg. Line <u>No</u> Ft. <u>No</u> Ft.	Street Widening <u>No</u> Ft. <u>No</u> Ft.	Fee <u>750</u>	
Corrections <u>Verified</u>				Application checked and approved			
Plans, Specifications and Application rechecked and approved.				Stamp here when Permit is Issued			
PLANS <u>11. No 5</u>				Continuous Inspection	SPRINKLER	DEC 4 - 1944	
For Plans Fee _____ Filed with _____				Specified - Required	Valuation Included Yes - No	Inspector _____	

12-3

BL - 11-13 - OK

Issue far - lot partly
in like area





Permit #:

03010 - 40000 - 02411

Plan Check #: B03SP0316FO Printed: 06/23/04 02:01 PM

Event Code:

Bldg-New
1 or 2 Family Dwelling
Regular Plan Check
Plan Check Submittal

City of Los Angeles - Department of Building and Safety
**APPLICATION FOR BUILDING PERMIT
AND CERTIFICATE OF OCCUPANCY**

Last Status: Ready to Issue

Status Date: 06/23/2004

<u>1. TRACT</u>	<u>BLOCK</u>	<u>LOT(s)</u>	<u>ARB</u>	<u>COUNTY MAP REF #</u>	<u>PARCEL ID # (PIN #)</u>	<u>2. ASSESSOR PARCEL #</u>
PECK'S OCEAN VIEW TRA	7	12		M B 11-162/163	003B197 106	7467 - 029 - 013
PECK'S OCEAN VIEW TRA	7	11	1	M B 11-162/163	003B197 108	7467 - 029 - 013
PECK'S OCEAN VIEW TRA	7	11	2	M B 11-162/163	003B197 109	7467 - 029 - 012
PECK'S OCEAN VIEW TRA	7	10	2	M B 11-162/163	003B197 111	7467 - 029 - 012

3. PARCEL INFORMATION

Area Planning Commission - Harbor
LADBS Branch Office - SP
Council District - 15
Certified Neighborhood Council - Coastal San Pedro
Community Plan Area - San Pedro

Census Tract - 2976.00
Coastal Zone Cons. Act - YES
District Map - 003B197
Energy Zone - 6
Hillside Grading Area - YES

Hillside Ordinance - YES
Lot Cut Date - 12/14/1909
Near Source Zone Distance - 4.2
Thomas Brothers Map Grid - 854-B2

ZONE(S): R1-1XL /

4. DOCUMENTS

ZI - ZI-1338	SOIL - 02/06/03	DLTR - LOG # 35302-04
ZI - ZI-859	SOIL - 11/06/02	CPC - CPC-2000-4046-CA
SPA - San Pedro	ORD - ORD-161185	CDBG - LARZ-San Pedro / Wilmington
SOIL - 01/13/03	ORD - ORD-83032	AFF - 03 2420269 (LOT TIE)

5. CHECKLIST ITEMS

Combine Elec - Wrk. per 91.107.2.1.1.1	Fabricator Req'd - Glued-Laminated Timber
Combine HVAC - Wrk. per 91.107.2.1.1.1	Fabricator Req'd - Prefabricated Joist
Combine Plumbg - Wrk. per 91.107.2.1.1.1	Special Inspect - Structural Observation

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Robertson, Graham And Massengill, Karena 1162 Paseo Del Mar SAN PEDRO CA 90731

Tenant:
Applicant: (Relationship: Owner-Bldr)
Graham - Owner-Builder

(310) 832-3076

7. EXISTING USE

PROPOSED USE

(01) Dwelling - Single Family

8. DESCRIPTION OF WORK

45'-10" X 60'-0" IRREGULAR TWO STORY SINGLE FAMILY DWELLING WITH ATTACHED DECK (4,985 SQ FT).

LA Department of Building and Safety
WL 11 09 065943 06/23/04 02:34PM

9. # Bldgs on Site & Use: VACANT LOT

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Francisco Rojas DAS PC By:
OK for Cashier: Francisco Rojas , Coord. OK:

Signature: [Signature] Date: 6/23/04

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: \$498,500 PC Valuation:

FINAL TOTAL Bldg-New	25,227.46	Planning Surcharge	119.48
Permit Fee Subtotal Bldg-New	2,355.65	Planning Surcharge Misc Fee	5.00
Energy Surcharge		School District Residential Level 2	18,594.05
Electrical	612.47	Dwelling Unit Construction Tax	200.00
HVAC	306.23	Residential Development Tax	300.00
Plumbing	612.47	Permit Issuing Fee	0.00
Plan Check Subtotal Bldg-New	1,053.36		
Off-hour Plan Check	526.68	<u>FIRE HYDRANT FEE NOTICE</u>	<u>THE CITY</u>
Plan Maintenance	47.11	ANGELES MAY AMEND THE FIRE HYDRANT FEE	
Fire Hydrant Refuse-To-Pay		ORDINANCE (LAMC SECTION 91.0304 (b) 8)	
E.O. Instrumentation	49.85	OWNER OF THE PROJECT DESIGNATED IN THIS	
O.S. Surcharge	111.28	SHALL BE OBLIGATED TO PAY THE DEPARTMENT	
Sys. Surcharge	333.83	A FIRE HYDRANT FEE IN THE AMOUNT TO BE	
		LATER DETERMINED TO BE NECESSARY TO	

12. ATTACHMENTS

Plot Plan *FR 82*

SERVICES FOR NEW DEVELOPMENT EXCEPTION
THIS PARAGRAPH NUMBER 8 SHALL NOT APPLY TO
ANY PERMIT FOR DEMOLITION OF A BUILDING OR
STRUCTURE

For information and/or inspection requests originating within LA County, please contact the appropriate office.

Call toll-free (888) LA4BUILD

DESCRIPTION	AMOUNT
PLUMBING PERMIT RES	\$112.47
W/0 #:	310024
For Cashier's CREDITING PLAN CHECK	\$1,053.36
PLAN APPROVAL FEE	\$526.68
PLAN MAINTENANCE	\$47.11
EI RESIDENTIAL	\$49.85
ONE STOP SURCH	\$111.28
SYSTEMS DEVT FEE	\$333.83
CITY PLANNING SURCH	\$119.48
MISCELLANEOUS	\$5.00
SCHOOL DEV RES	\$18,594.05
DWELLING UNIT	\$200.00
RES DEVT TAX	\$300.00

Subtotal: \$25,227.46

Carry Over FROM Trans 065942	\$5,145.88
------------------------------	------------

Total Due: \$30,373.34

Credit Card:	\$30,373.34
--------------	-------------

04WL 94714



* P 0 3 0 1 0 4 0 0 0 0 0 2 4 1 1 F N *

13. STRUCTURE INVENTORY

03010 - 40000 - 02411

(P) Floor Area (ZC) 4,985 Sqft
 (P) Height (BC) 25 Feet
 (P) Height (ZC) 26 Feet
 (P) Length 60 Feet
 (P) Stories 2 Levels
 (P) Width 45 Feet
 (P) Dwelling Unit 1 #Changed 1 Unit Total
 (P) R3 Occupancy 4,985 Sqft Max Occ.
 (P) Parking Req'd 2 #Changed 2 Total
 (P) Provided Standard Parking 4 Stalls

(P) Total Parking for Site 4 Site Total
 (P) Type V-N Construction
 (P) NFPA-13R Fire Sprinklers Thru-out

14. APPLICATION COMMENTS

** Approved Seismic Gas Shut-Off Valve may be required. ** Research Report Numbers for Rastra are: RR# 25006, 25505, 25477. Grading Pre-Inspection required; applicant to submit fees. Hillside Referral Form needs to be completed.

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless, the information printed exceeds that required by Section 19825 of the Health and Safety Code of the State of California.

15. Building Relocated From:

16. CONTRACTOR, ARCHITECT, & ENGINEER NAME	ADDRESS	CLASS	LICENSE#	PHONE #
(E) Schuricht, John Otto	609 Tyburn Rd,	Palos Verdes Estates, CA 90274	S2391	
(G) Keene, Arthur G	2601 East Victoria St., #308,	Rancho Dominguez, CA 90220	EG16	
(O) , Owner-Builder			0	3108323076

PERMIT EXPIRATION

This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by the Dept. of Building & Safety (Sec. 22.12 & 22.13 LAMC).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code: Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500).):

☐ I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

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

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

☐ I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

☐ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier: _____ Policy Number: _____

☒ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS (\$100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION

I certify that notification of asbestos removal is either not applicable or was sent to the AQMD or EPA as per section 19827.5 of the Health and Safety Code.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

- (1) I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration and Final Declaration; and
 (2) This permit is being obtained with the consent of the legal owner of the property.

Print Name: KAREN MASSENGILL Sign: Karen Masengill Date: 6/23/04 ☒ Owner ☐ Authorized Agent

Bldg-New

City of Los Angeles - Department of Building and Safety

Plan Check #: B03SP0316FO

1 or 2 Family Dwelling

Initiating Office: SANPEDRO

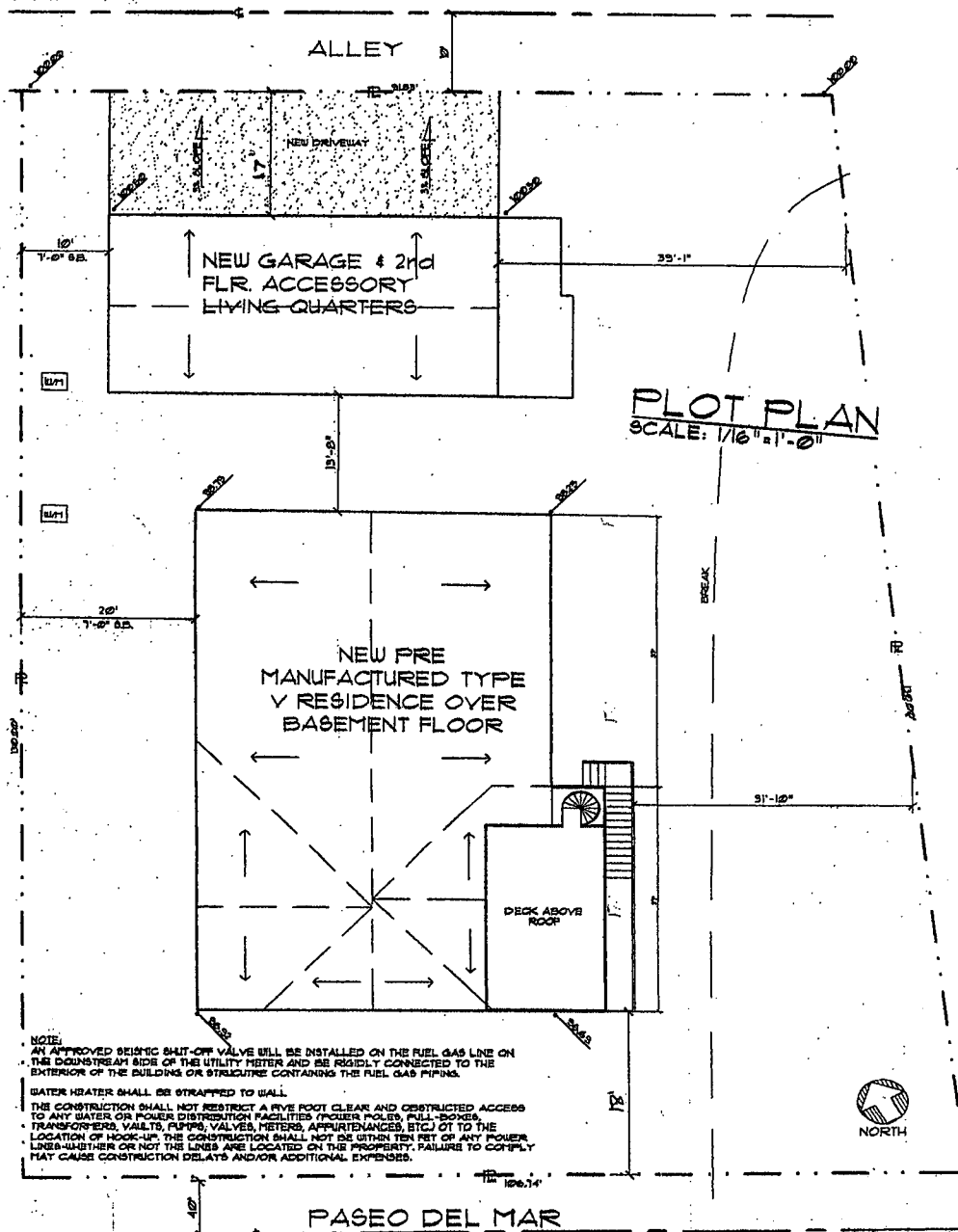
Plan Check Submittal

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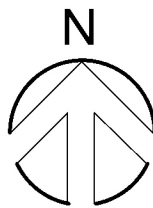
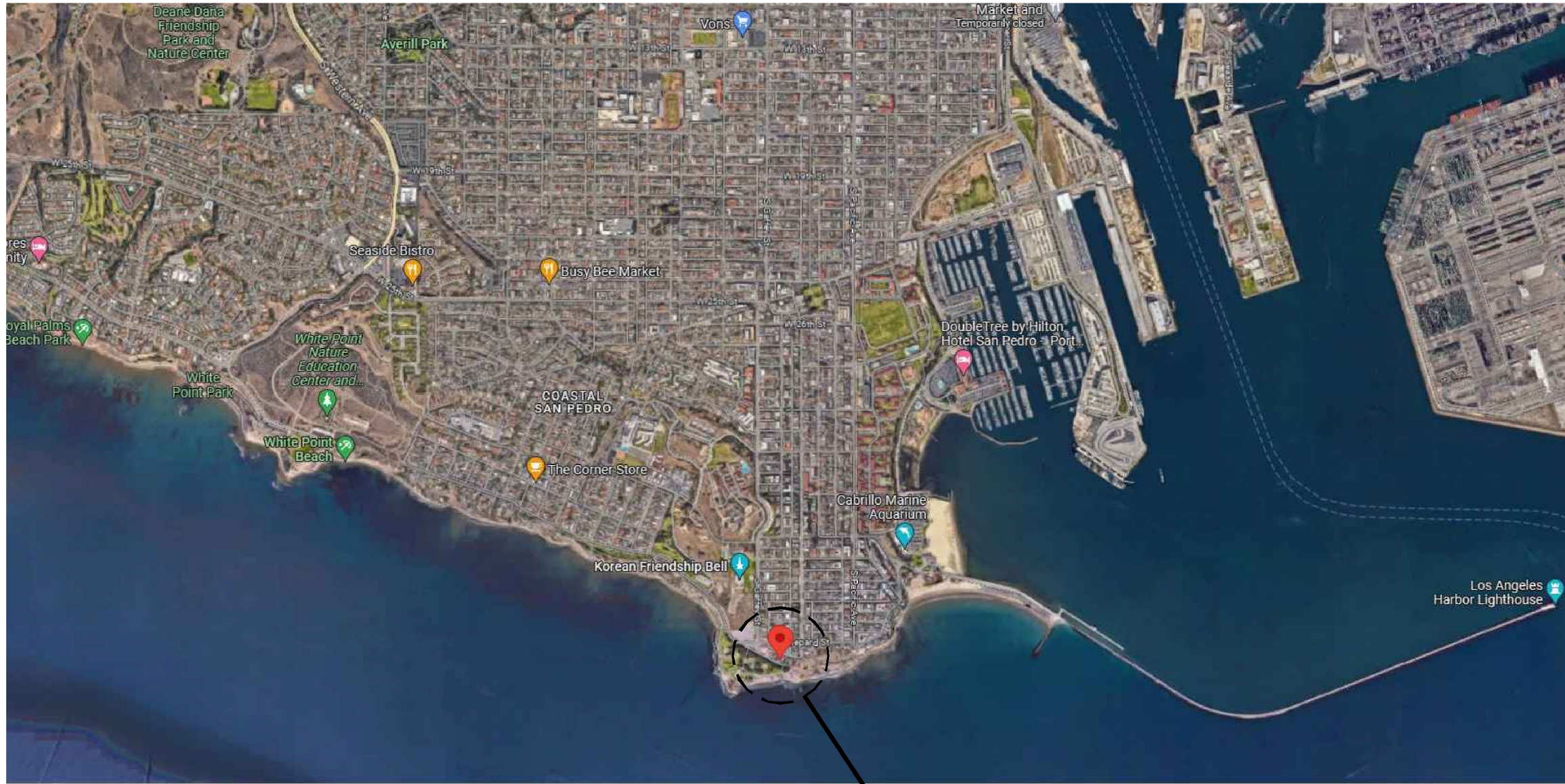
PLOT PLAN ATTACHMENT

101072020047893

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)

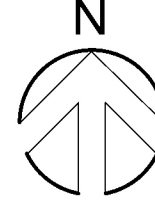


Attachment C - Updated Project Plans



Context Map 15

ENTITLEMENTS:
- PER LAMC SECTION 12.24.X.27, APPROVAL TO PERMIT THE CONTINUATION OF USE OF A NON-CONFORMING COMMERCIAL RESTAURANT USE IN THE R1-1XL ZONE.
- PER LAMC SECTION 12.20.2, A COASTAL DEVELOPMENT PERMIT TO PERMIT THE RENOVATION OF AN EXISTING HISTORIC CAFE AND TO PERMIT THE NEW CONSTRUCTION OF A SINGLE FAMILY DWELLING WITH AN ATTACHED ADU.
- PER LAMC SECTION 12.24-W.1, A CONDITIONAL USE PERMIT FOR BEVERAGES (CUB) TO PERMIT ON-SITE SALE AND CONSUMPTION OF BEER AND WINE AT AN EXISTING RESTAURANT IN THE R1-1XL ZONE, INCLUDING 27 INTERIOR SEATS 60 EXTERIOR SEATS (16 WITHIN FRONT PATIO AND 44 ON REAR PATIO), HAVING HOURS OF OPERATION MONDAY-SUNDAY FROM 8AM TO 8PM.



Site Map 7



Render 9

<u>Building Height</u>			
Stories	Allowable	Proposed	
Height	2 Stories	2 Stories	
	26'-0"	1'-0"	
<u>Setbacks</u>			
	Required	Proposed	
Front	20'-0"	40'-8"	
Rear	15'-0"	15'-0"	
Side	5'-7"	6'-0"	
(10% of lot Width; add 1'-0" if bldg is 18'-0" and another 1'-0" if bldg is 28'-0")		A	
<u>Demolition</u>			
Existing Garage		1,118 SF	B, C
<u>Parking</u>			
	Required	Proposed	
SFR	Two Parking spaces	Two Parking spaces	
ADU	One Parking space	One Parking space	
Total	Three Parking Spaces	Three Parking Spaces	
<u>Max Buildable Area Calculation</u>			
	Allowed	Proposed	
3 x Buildable Area = Allowable FAR		736 SF(WALKERS) + 3,523 SF(RESIDENTIAL) = 4,259 SF	
3 x 3,390 SF = 10,170 SF		4,259 SF < 10,170 SF	
10,170 / 3,390 = 3		4,529 / 3,390 = 1.26	
ALLOWABLE FAR = 3		PROPOSED FAR = 1.26 : 1	
<u>Area Summary & Breakdown</u>			
<u>Walker's Cafe (EXISTING)</u>			
Ground Floor	736 SF		
<u>Main House (NEW)</u>			
Ground Floor	1,209 SF	ADU(NEW)	431 SF
Second Floor	1,244 SF	Ground Floor	639 SF
	2,453 SF	Second Floor	1,070 SF
TOTAL	3,523 SF		
<u>Main House (NEW)</u>			
Roof Deck	890 SF	ADU(NEW)	290 SF
Garage	398 SF	NO OPERATING PROVIDED FOR COMMERCIAL BUILDING.	
(EXISTING) + (NEW)			
Walker's Cafe + Residential			
736 SF + 3,523 SF			
GRAND TOTAL 4,259 SF			

Project Summary 5

ARCHITECTURAL		A3.02	Elevations
A0.00	Cover Sheet	N-W	
A1.00	Survey	A4.01	Site Section
D1.00	Demolition Plan		
A1.01	Site Plan - Walker's Cafe		
A1.02	Seating Plan - Walker's Cafe		
A1.03	Site Development Plan - Ground Floor Plan		
A1.04	Site Development Plan - Second Floor Plan		
A1.05	Site Development Plan - Roof Deck Plan		
A2.01	Building Diagram		
A3.01	Elevations S-E		

Drawing List 4B

2019 California Building Code
2019 California Residential Code
2019 California Mechanical Code
2019 California Plumbing Code
2019 California Electrical Code
2019 California Energy Code
2019 California Green Building Standards Code

Applicable Building Code Information 4A

Project Scope:	
Work shall include but not limited to the following:	
-	new two story residential residence with roof deck with an attached adu (LAMC 12.22.a.33.b.2 LAMC 12.22.a.33.c.6)
-	addition of a 2-car garage and single space carport
-	demolition of existing garage
-	restoration of cafe
-	alcohol sales

Scope Of Work 3b

OWNER:	PROSPECT GROUP REAL ESTATE INVESTMENTS 203 N SAN FERNANDO BLVD, BURBANK, CA 91502 TEL: (818) 588 3881 CONTACT: VARTAN ACHABAHIAN
ARCHITECT:	GIBBS ARCHITECTS 3575 LONG BEACH BLVD, LONG BEACH, CA 90807 TEL: (562) 981-2000 CONTACT: KURT GIBBS

Project Team 3a

Site Address	700 W Paseo del Mar, San Pedro, CA
Zip	90731
PIN Number	003B197 94
Assessor Parcel No. (APN)	7467029016
Zoning	R1-1XL
Land Use	Low II Residential
Lot Size	6,138.4 SF
Thomas Brothers Grid	PAGE 854 - GRID B2
Map Reference	M B 11-162/163
Block	7
Lot	15
Arb (Lot Cut Reference)	None
Map Sheet	003B197
Community Plan Area	San Pedro
Area Planning Commission	Harbor
Neighborhood Council	Coastal San Pedro
Council District	CD 15
Census Tract #	2976.01
Occupancy Classification	R
Occupancy Use	Single Family Residential
Zoning	R1-1XL
Existing Land Use	Low II Residential
Construction Type	Type V-B
Number of Stories	Two-Story
Sprinklered	YES- NFPA 13R

Project Information 2

**SINGLE FAMILY
RESIDENCE &
WALKER'S CAFE**
700 Paseo Del Mar
San Pedro, CA 90731

Vartan Achabahian
Prospect Group Real Estate Investments
203 N San Fernando Blvd, Burbank, CA 91502
T:(818) 588 3881



Kurt Gibbs AIA
3575 Long Beach Blvd.
Long Beach CA, 90807
T: 562.981.2000
E: kurt@gibbs1934.com



Revisions:		
No.	Issue	Date
1	OHR Review	17 Feb 2023
2	Zoning Comment Response	7 Feb 2024
3	Zoning Comment Response	7 Mar 2024
4	Zoning Comment Response	27 Mar 2024
5	Planning Comment Response	13 June 2024
6	Planning Comment Response	22 Nov 2024

Project Number:

Date:
20 May 2026

File:

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Sheet Title:

Cover Sheet

Drawing Number:

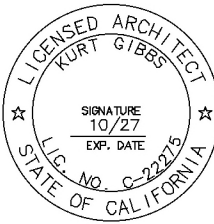
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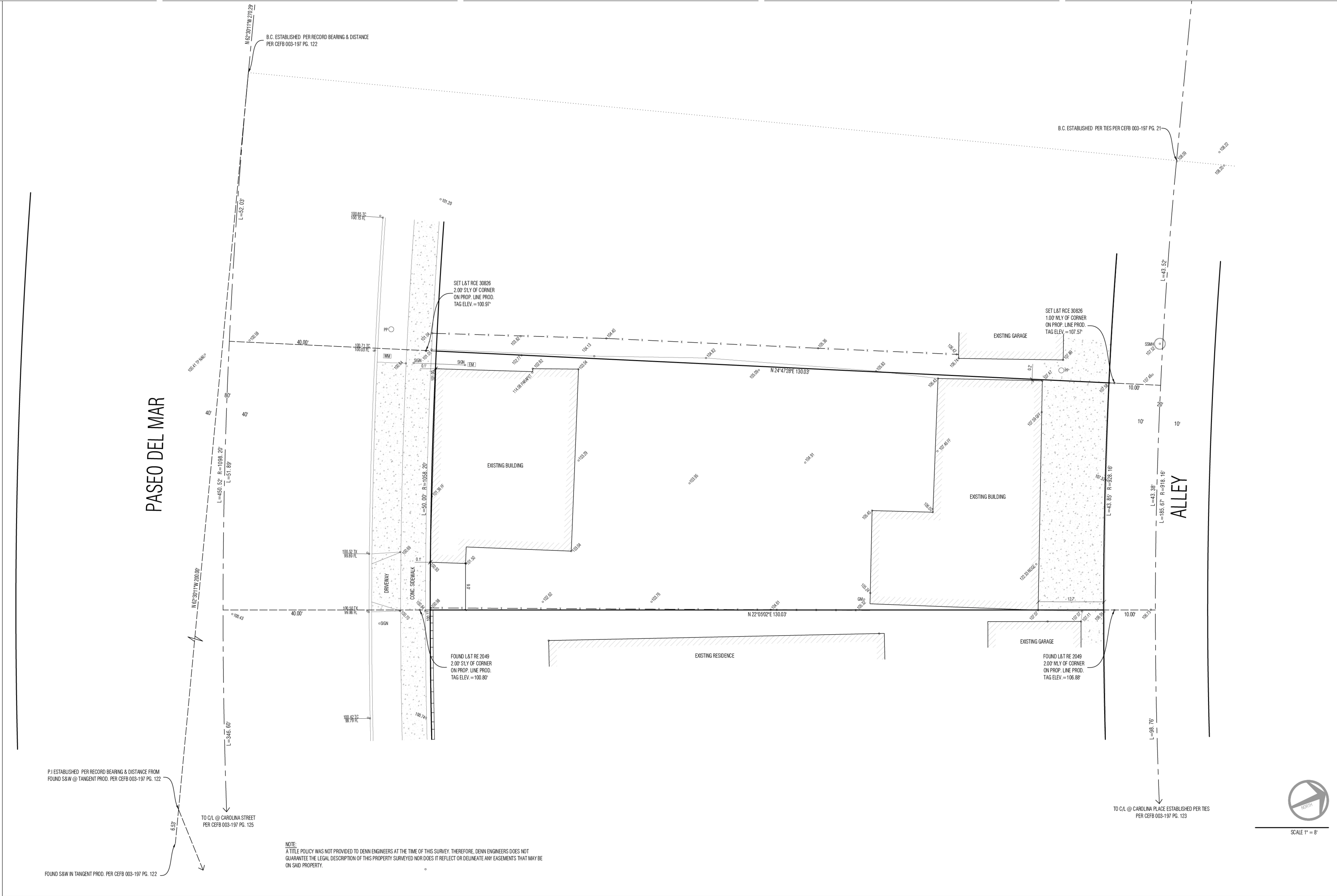
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Sheet Title:
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Drawing Number:

A1.00



Survey

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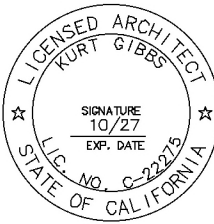
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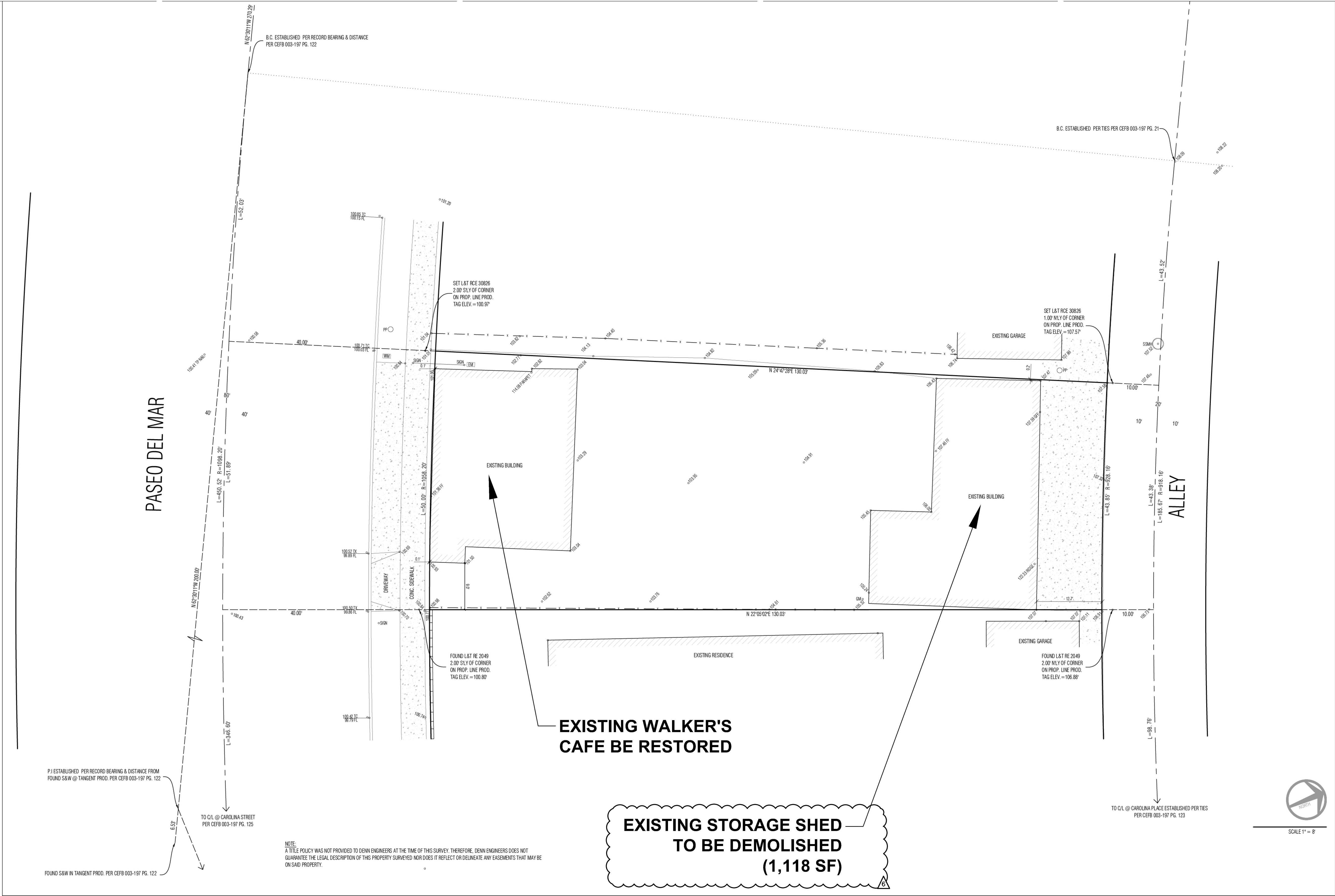
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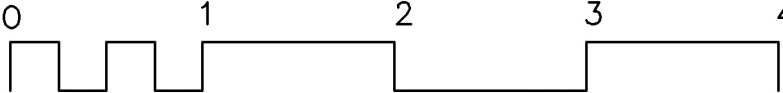
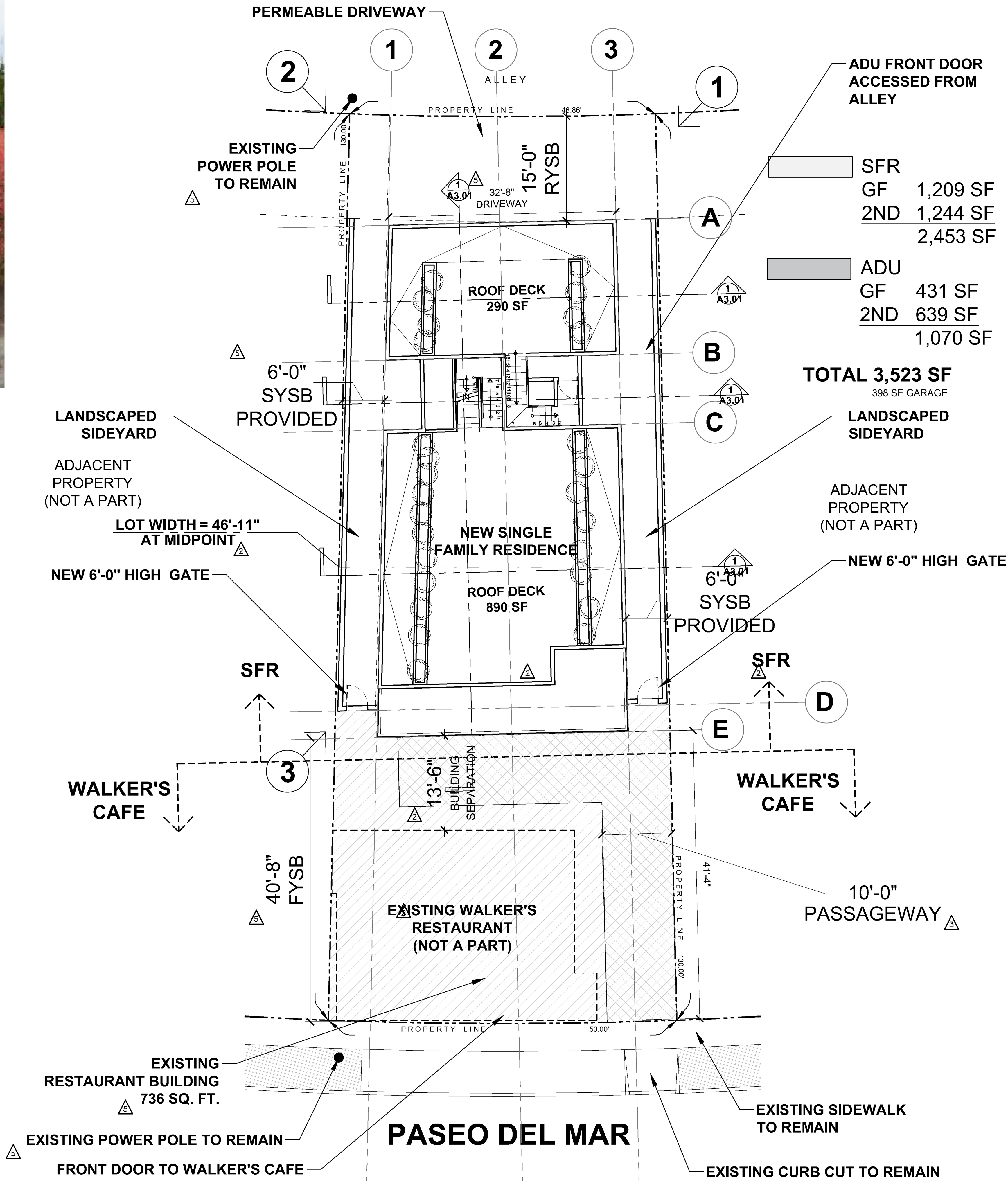
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Fraser's Photinia

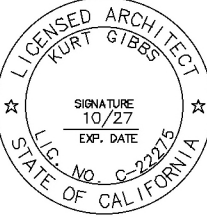


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700 Paseo Del Mar,
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E: kurt@gibbs1934.com



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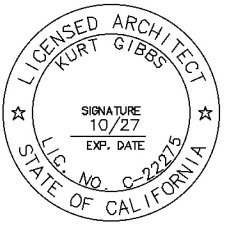
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Drawing Number:

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700 Paseo Del Mar,
San Pedro, CA 90731

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3575 Long Beach Blvd.
Long Beach CA, 90807
T: 562.981.2000
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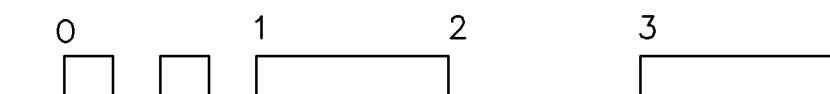
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Ground Floor**

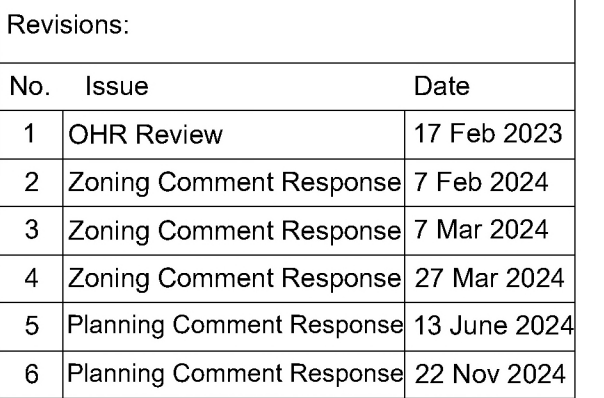
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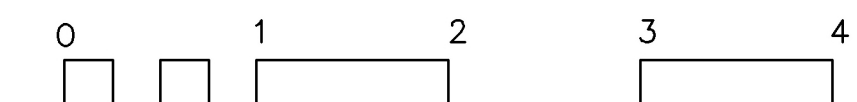


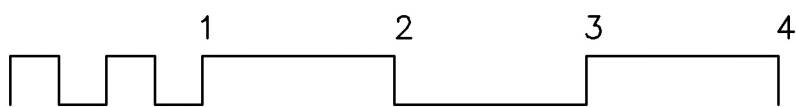
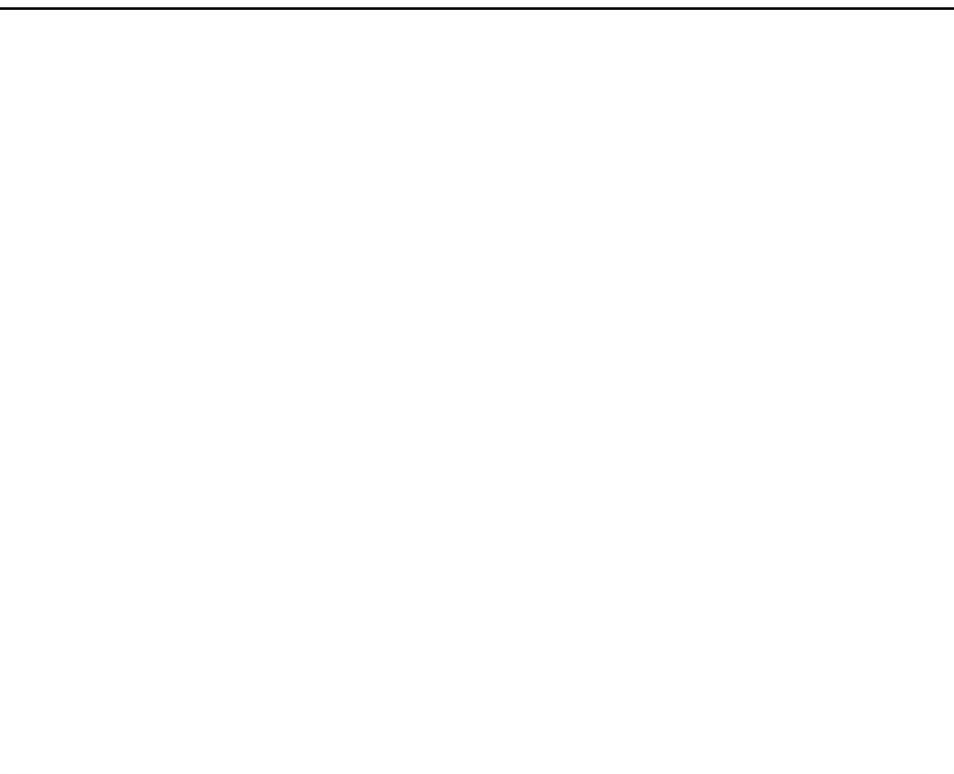
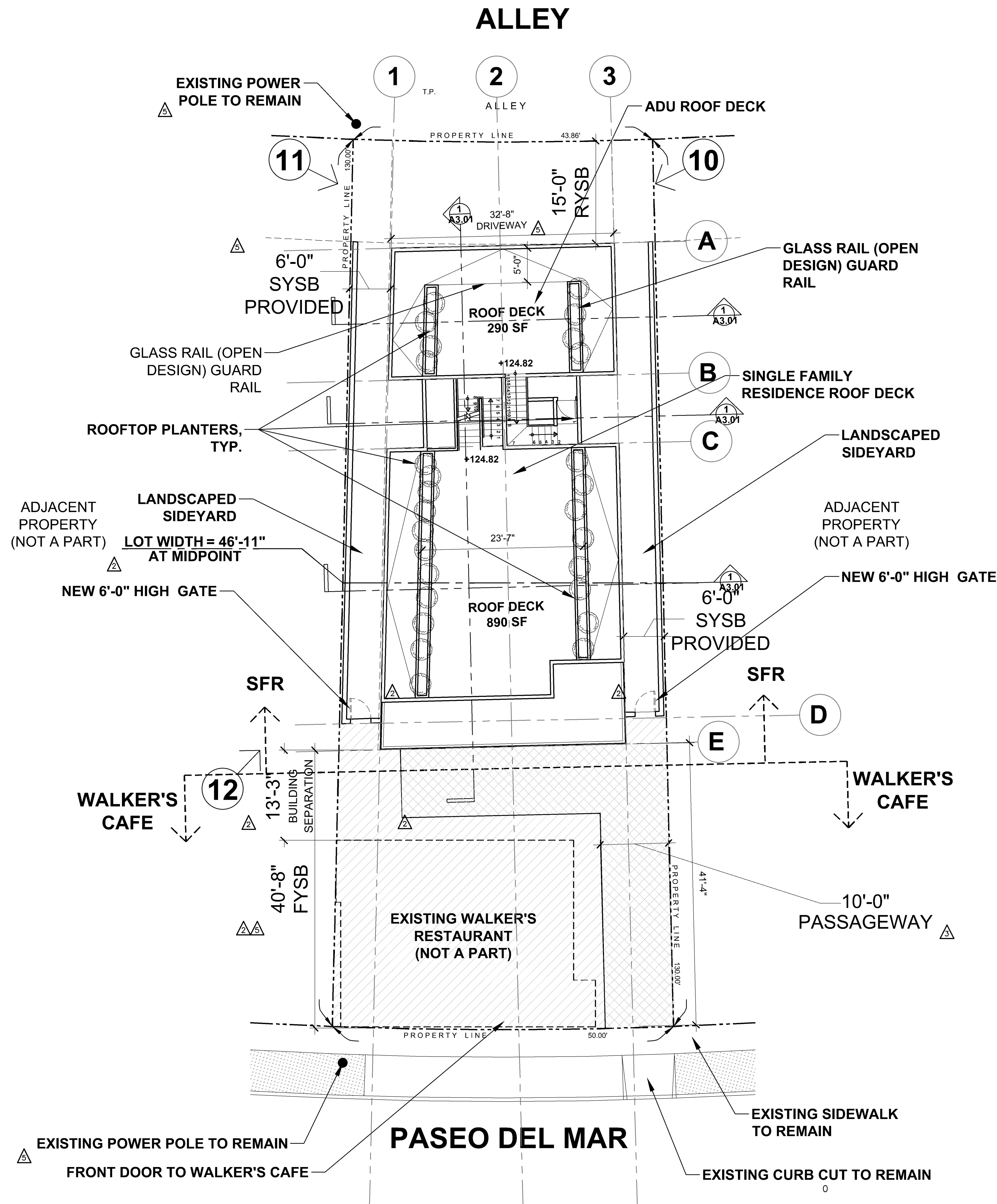
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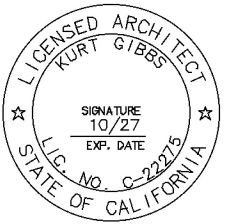


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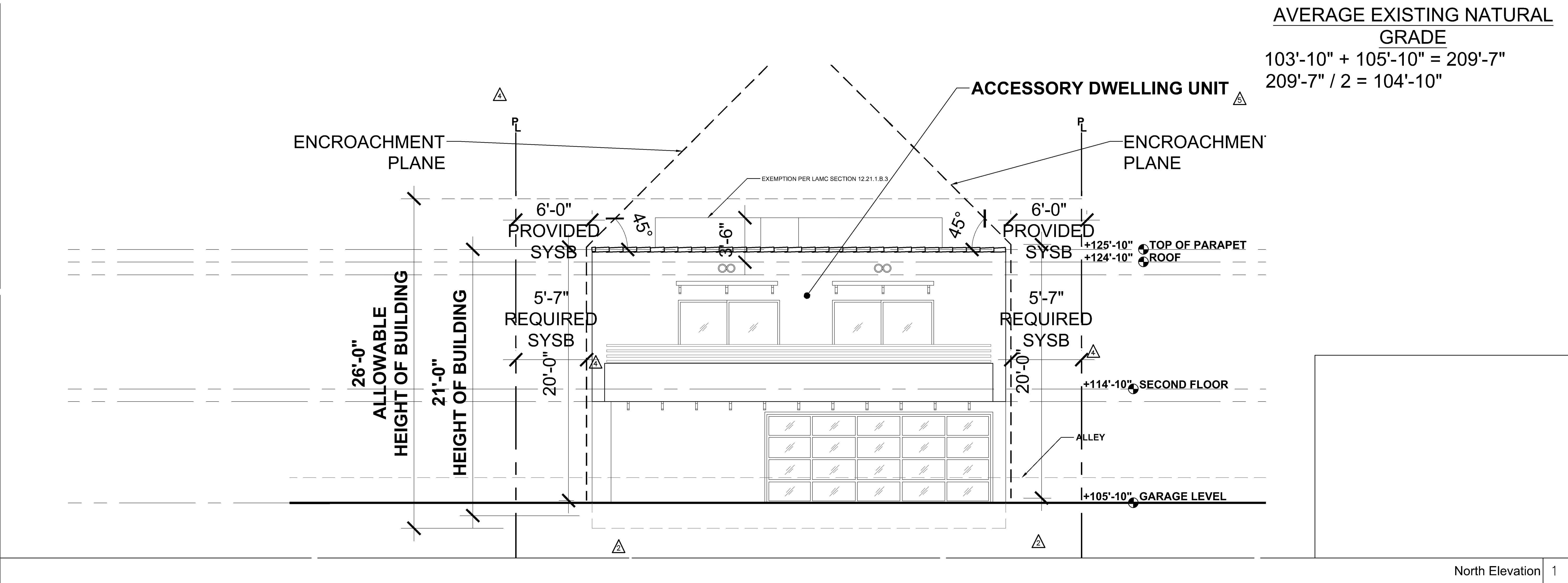
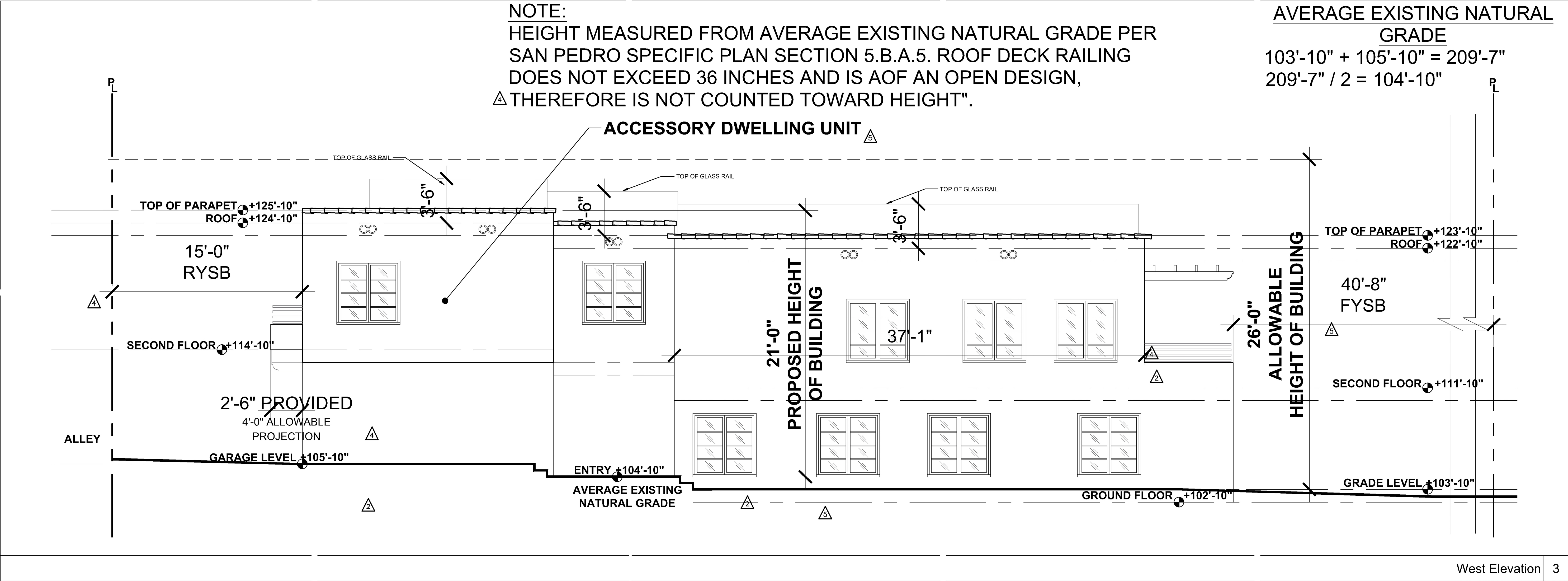
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**Site Development Plan
Roof Deck Plan**

Drawing Number:

A1.06

South Elevation	1
-----------------	---



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203 N San Fernando Blvd, Burbank, CA 91502
T: (818) 588 3881

GIBBS
ARCHITECTS INC.

Kurt Gibbs AIA
3575 Long Beach Blvd.
Long Beach CA, 90807
T: 562.981.2000
E: kurt@gibbs1934.com

10/27/2024
10/27/2024
10/27/2024
10/27/2024
10/27/2024
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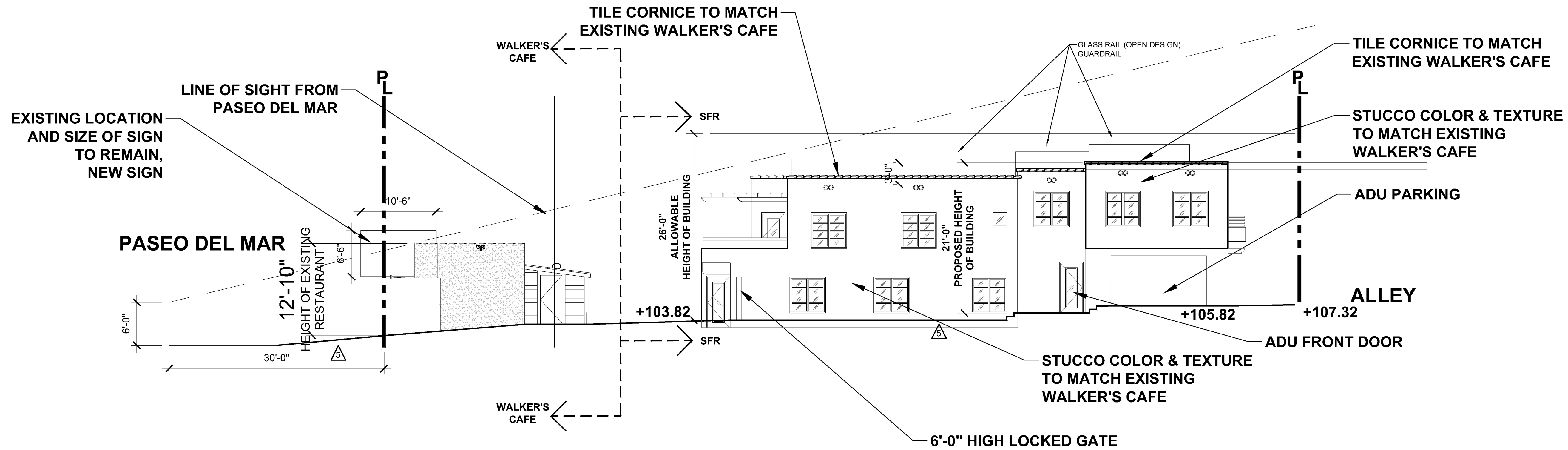
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**Elevations
N-W**

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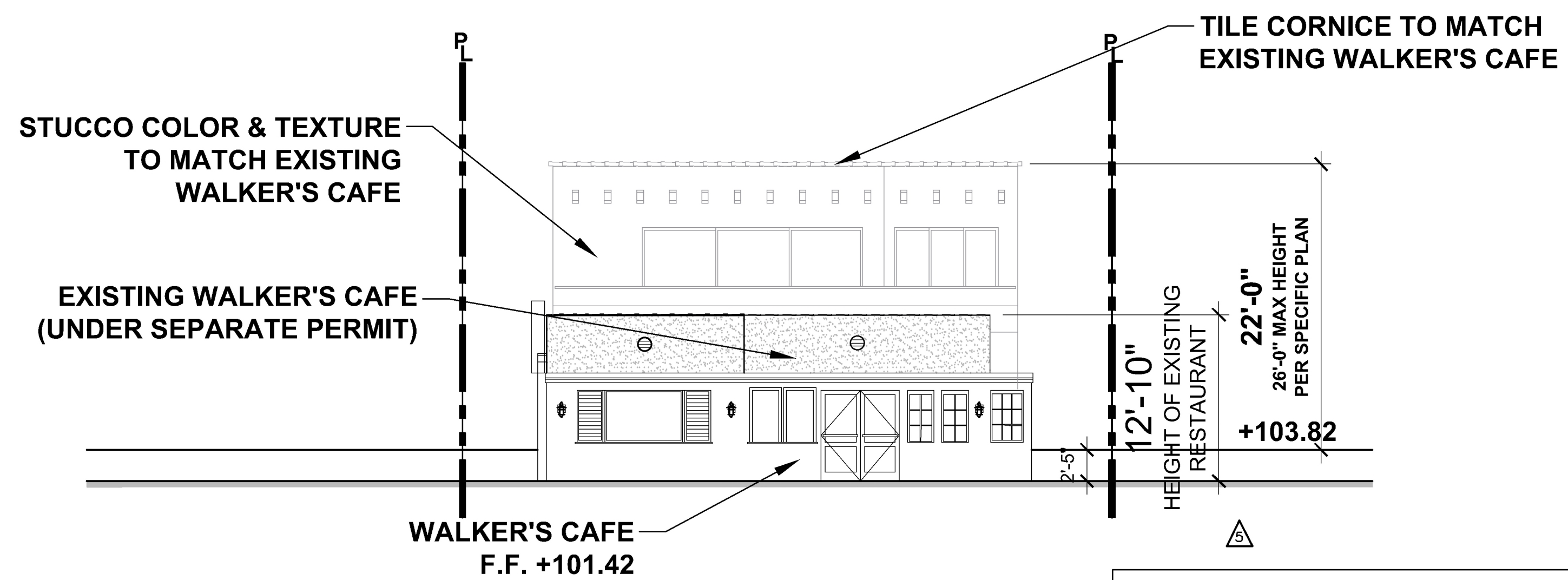
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Site Section

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3



Site Section

SCALE: 1/8" = 1'-0"
FILE:

1

WALKER'S CAFE

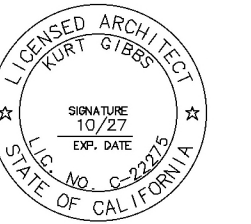
700 Paseo Del Mar
San Pedro, CA 90731

REHABILITATION

Vartan Achabadian
Prospect Group Real Estate
Investments
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CA 91502
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Revisions:

No.	Issue	Date
1	OHR Review	17 Feb 2023

Project Number:

Date:
20 May 2026

File:

Scale:
SCALE AS NOTED

Sheet Title:
Site Section

Drawing Number:

A4.01

NOTE:
NO ALCOHOL TO BE SERVED IN SEATS LOCATED IN THE PUBLIC
RIGHT OF WAY IN FRONT OF THE CAFE BUILDING.

SUMMARY:

INDOOR SEATING	
BAR SEATS	7
SEATS	
ROUND TABLES	4 SEATS
BOOTHS	16 SEATS
TOTAL	27
SEATS	

OUTDOOR SEATING
FRONT PATIO (UNCOVERED)
ROUND TABLES 16 SEATS

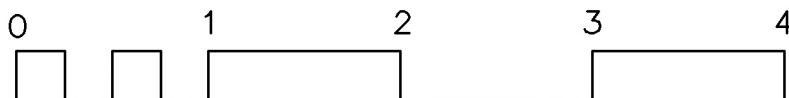
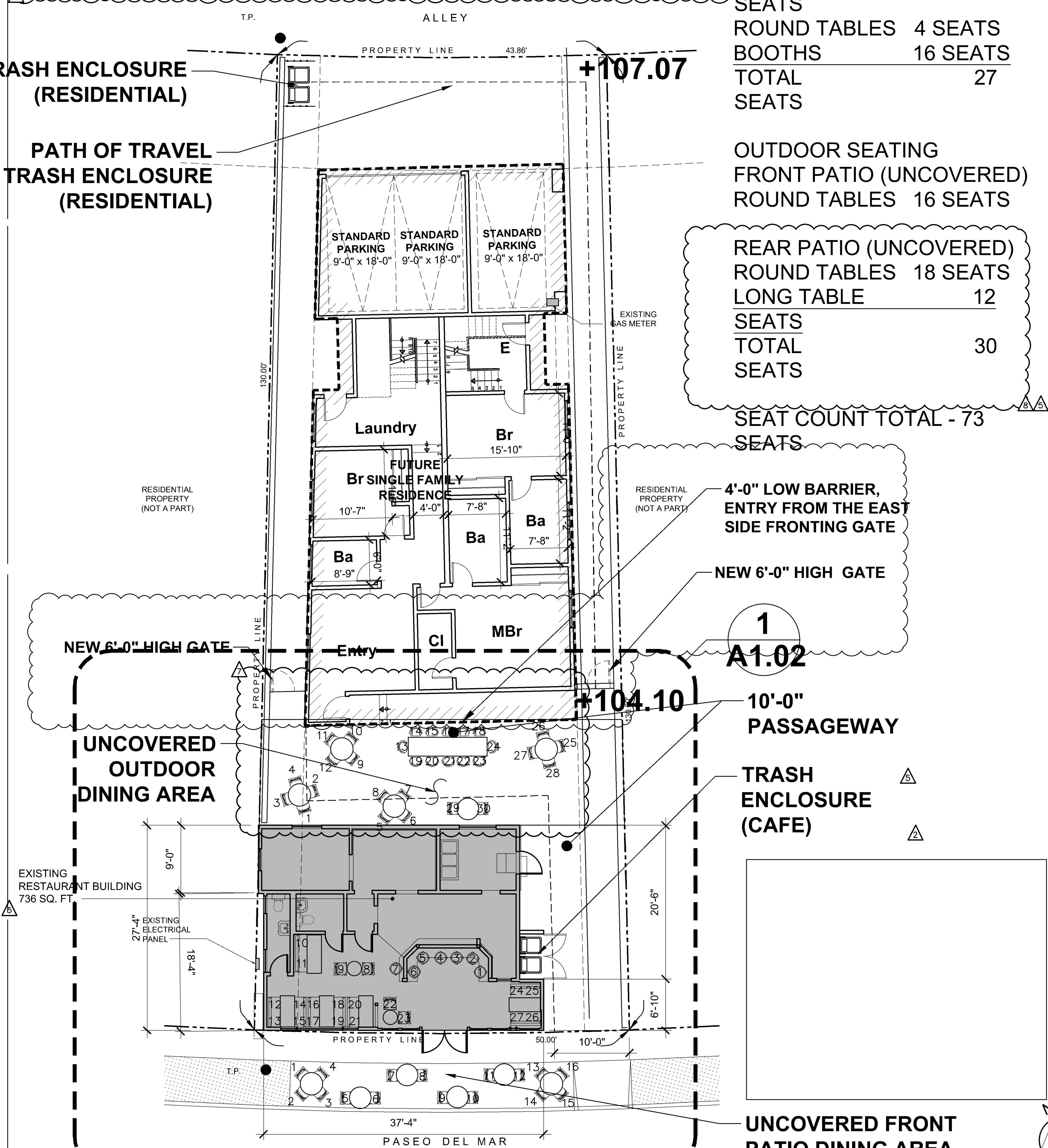
REAR PATIO (UNCOVERED)

ROUND TABLES	18 SEATS
LONG TABLE	12
SEATS	
TOTAL	30
SEATS	

SEAT COUNT TOTAL - 73
SEATS

TRASH ENCLOSURE
(RESIDENTIAL)

PATH OF TRAVEL
TRASH ENCLOSURE
(RESIDENTIAL)



Site Plan

SCALE: 1/8" = 1'-0"
FILE:

1

WALKER'S CAFE

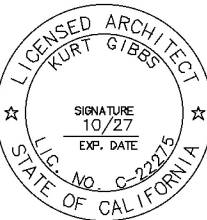
700 Paseo Del Mar
San Pedro, CA 90731

REHABILITATION

Vartan Achabadian
Prospect Group Real Estate
Investments
203 N San Fernando Blvd, Burbank,
CA 91502
T: (818) 588 3881



Kurt Gibbs AIA
3575 Long Beach Blvd.
Long Beach CA, 90807
T: 562.981.2000
E: kurt@gibbs1934.com



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Date:
20 May 2026

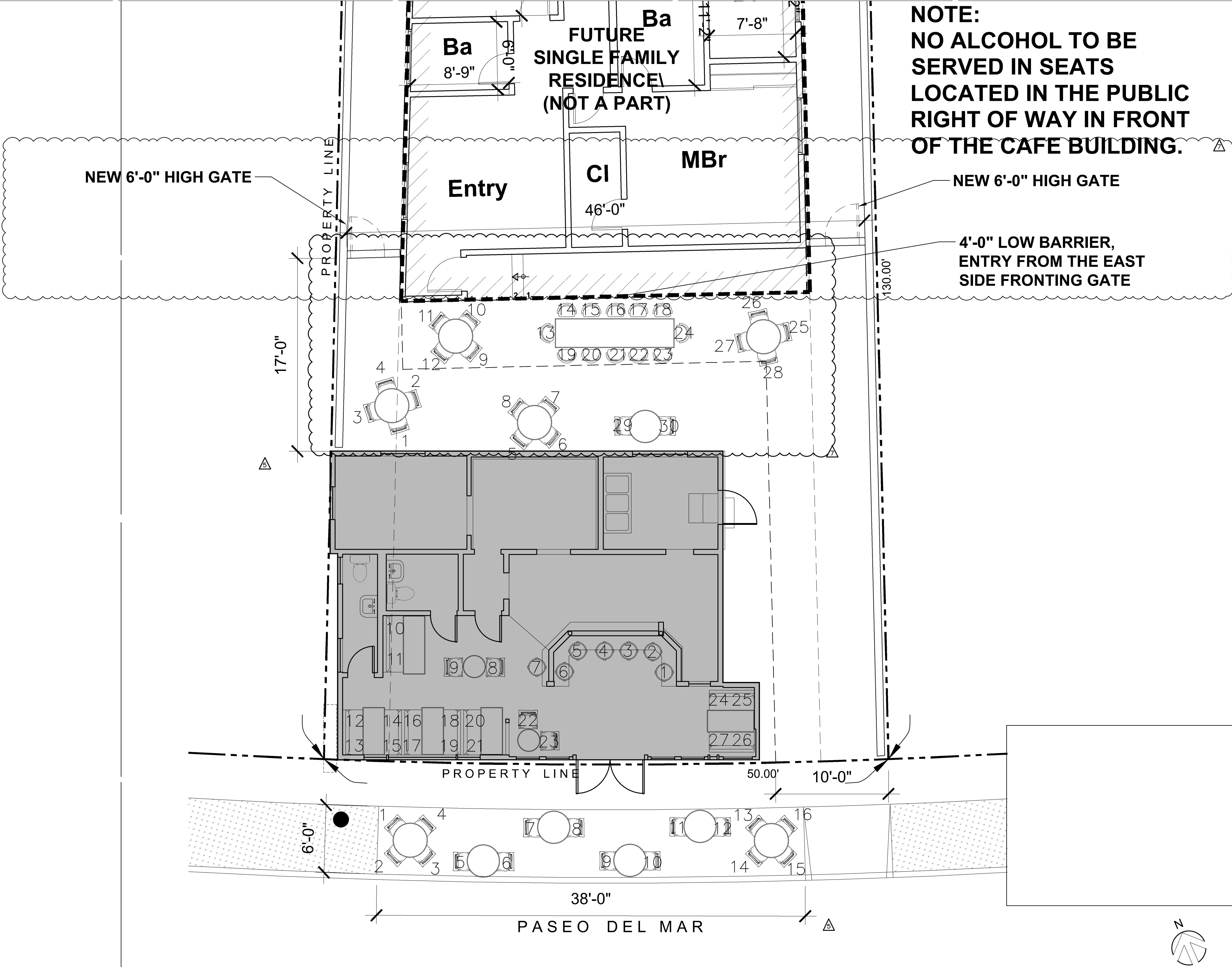
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Scale:
SCALE AS NOTED

Sheet Title:
Site Plan
(Walker's Cafe)

Drawing Number:

A1.01



NOTE:
NO ALCOHOL TO BE
SERVED IN SEATS
LOCATED IN THE PUBLIC
RIGHT OF WAY IN FRONT
OF THE CAFE BUILDING.

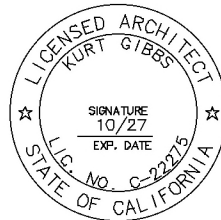
WALKER'S CAFE
700 Paseo Del Mar
San Pedro, CA 90731

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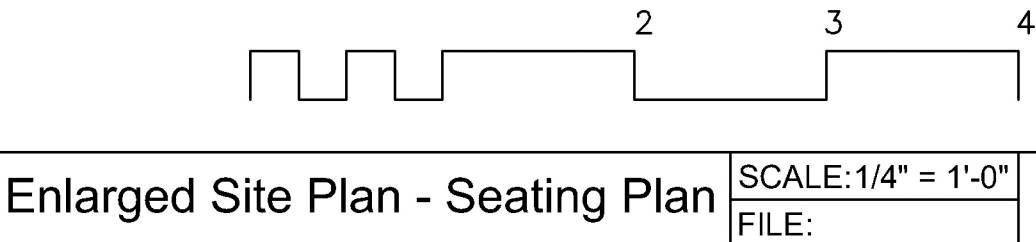
Date: 20 May 2026

File:

Scale: SCALE AS NOTED

Sheet Title:
**Seating Plan
(Walker's Cafe)**

Drawing Number:
A1.02

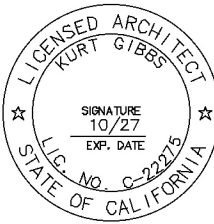


REHABILITATION

Vartan Achabahian
Prospect Group Real Estate
Investments
203 N San Fernando Blvd, Burbank,
CA 91502
T:(818) 588 3881



Kurt Gibbs AIA
3575 Long Beach Blvd.
Long Beach CA, 90807
T: 562.981.2000
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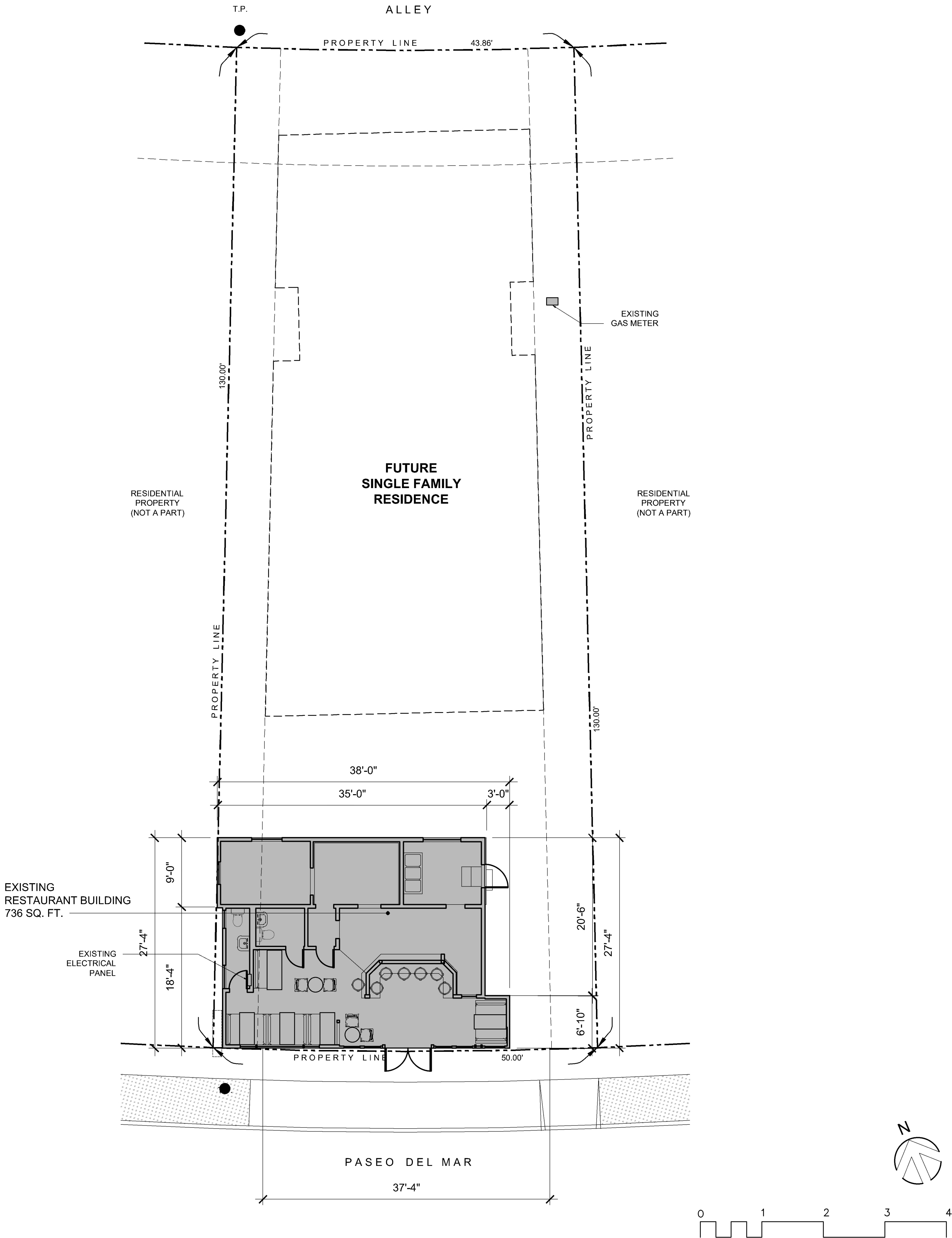
Date: 20 May 2026

File:

Scale: SCALE AS NOTED

Sheet Title: **Site Plan**

Drawing Number: **A1.00**

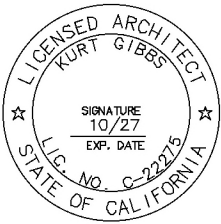


REHABILITATION

Vartan Aachabian
Prospect Group Real Estate
Investments
203 N San Fernando Blvd, Burbank,
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T:(818) 588 3881



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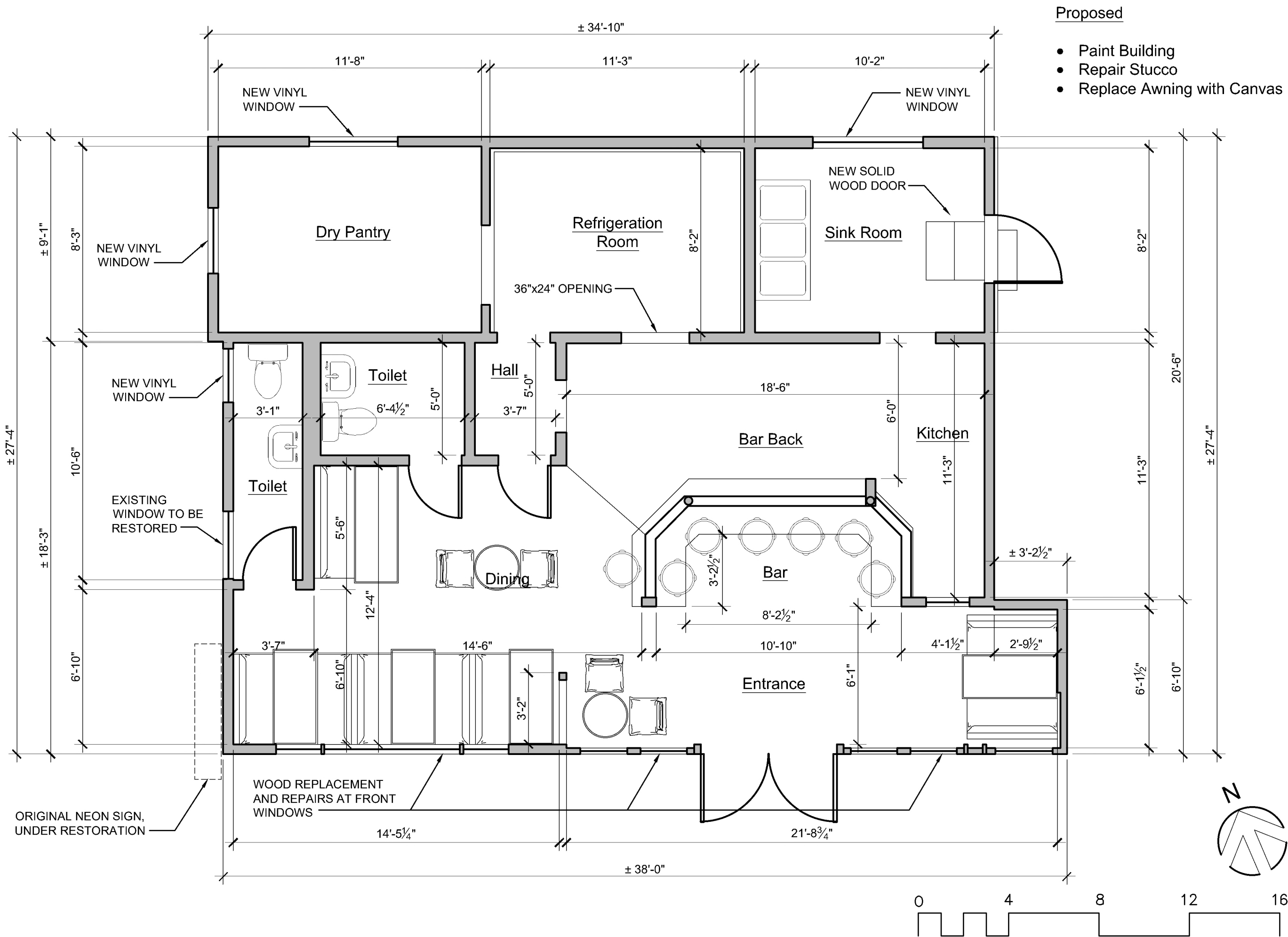
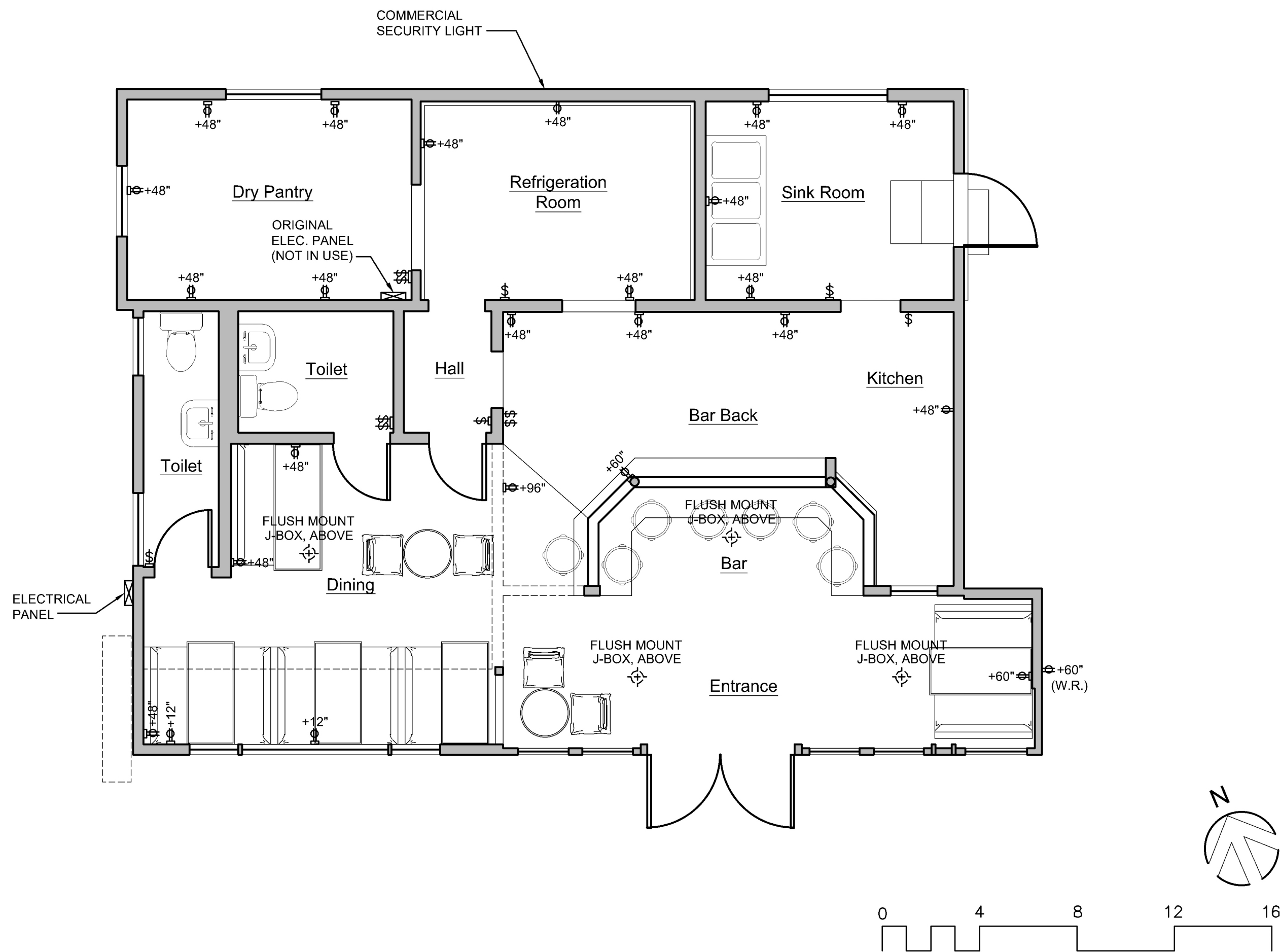
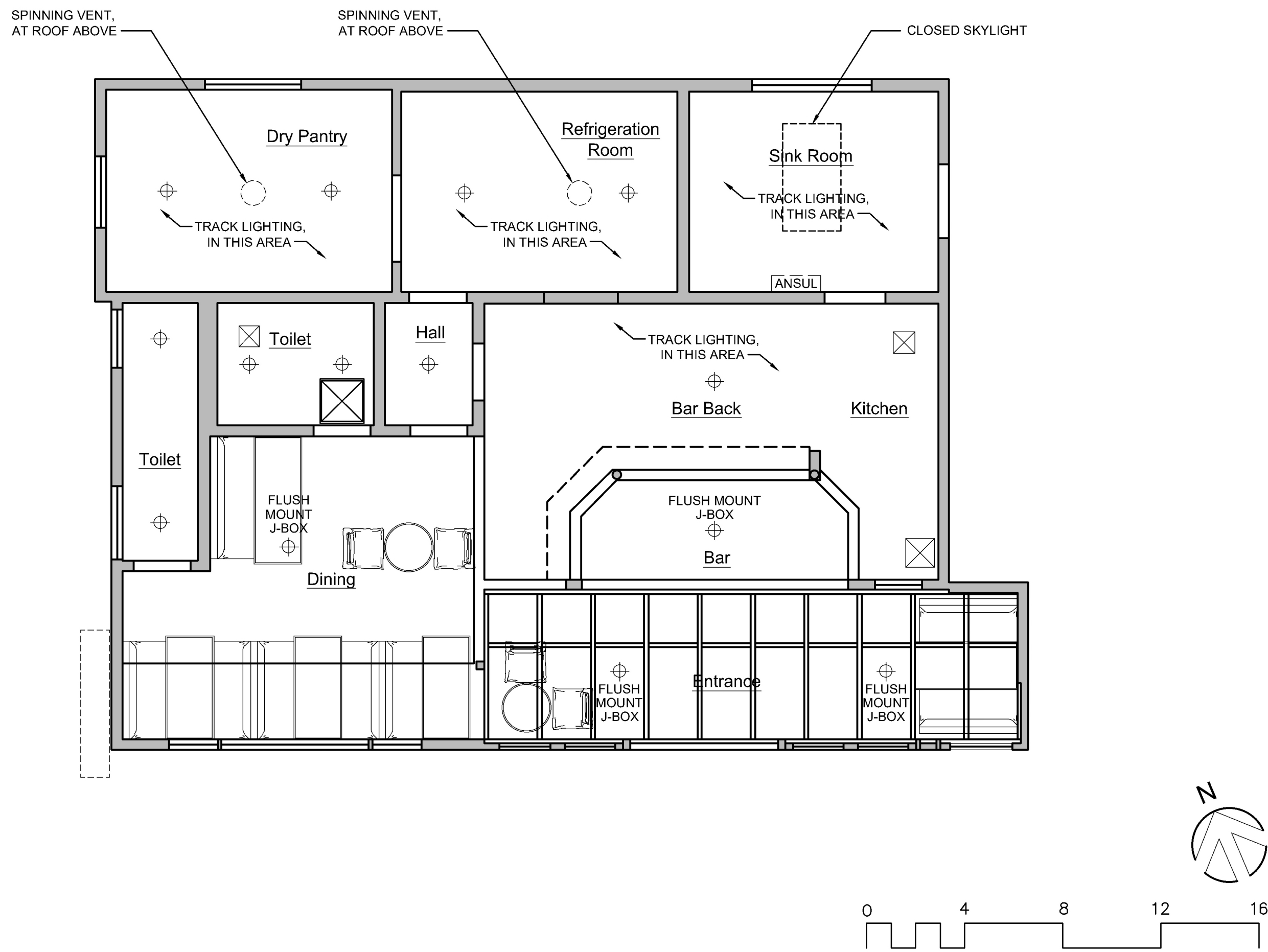
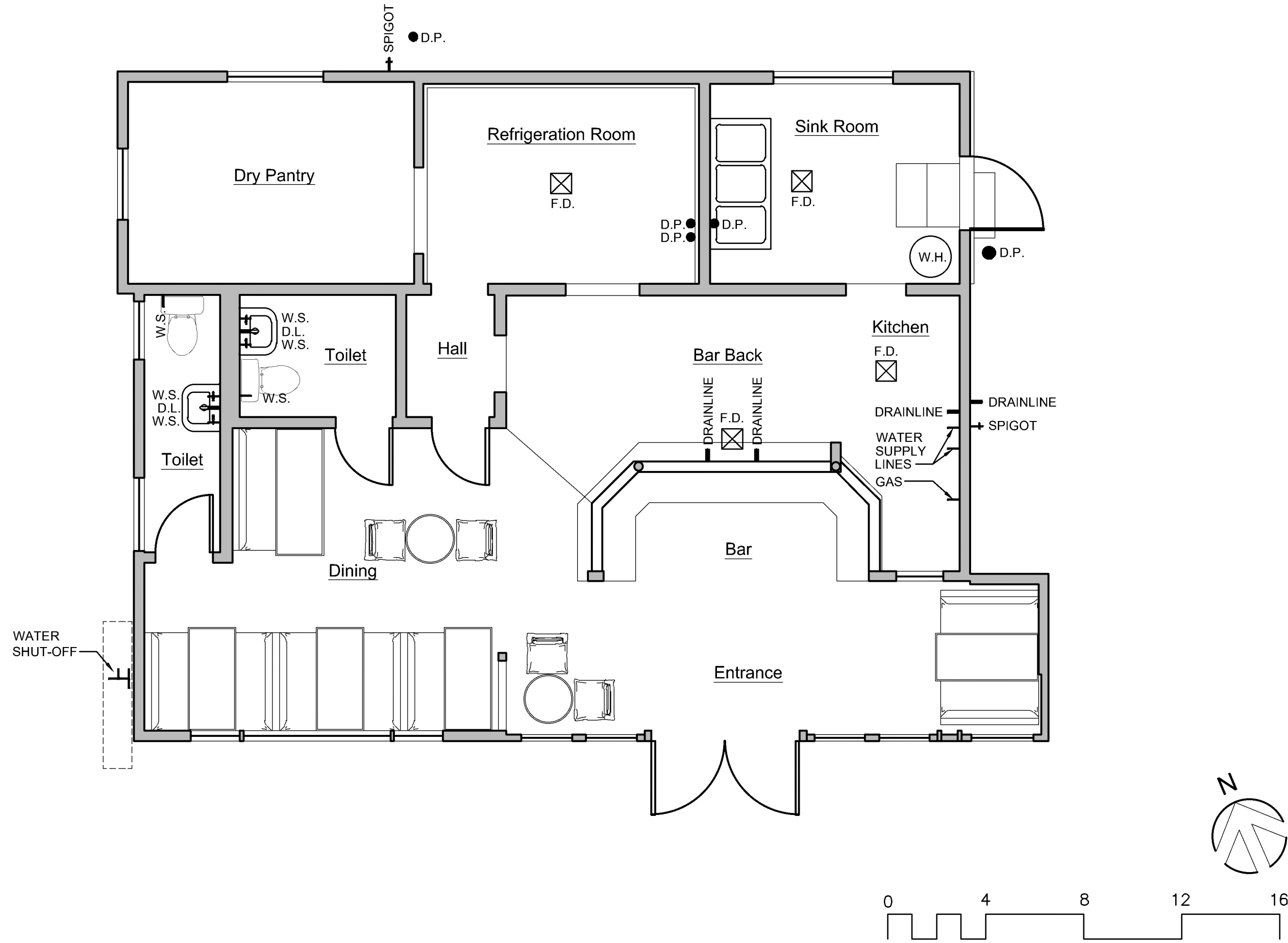
File:

Scale:
SCALE AS NOTED

Sheet Title:
**As-built Floor, Reflected
Ceiling, Electrical &
Plumbing Plans**

Drawing Number:

A2.00



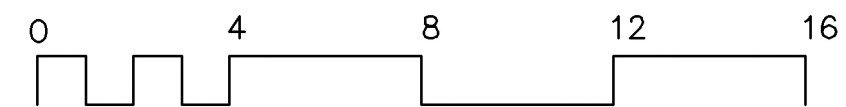
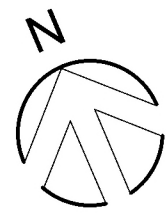
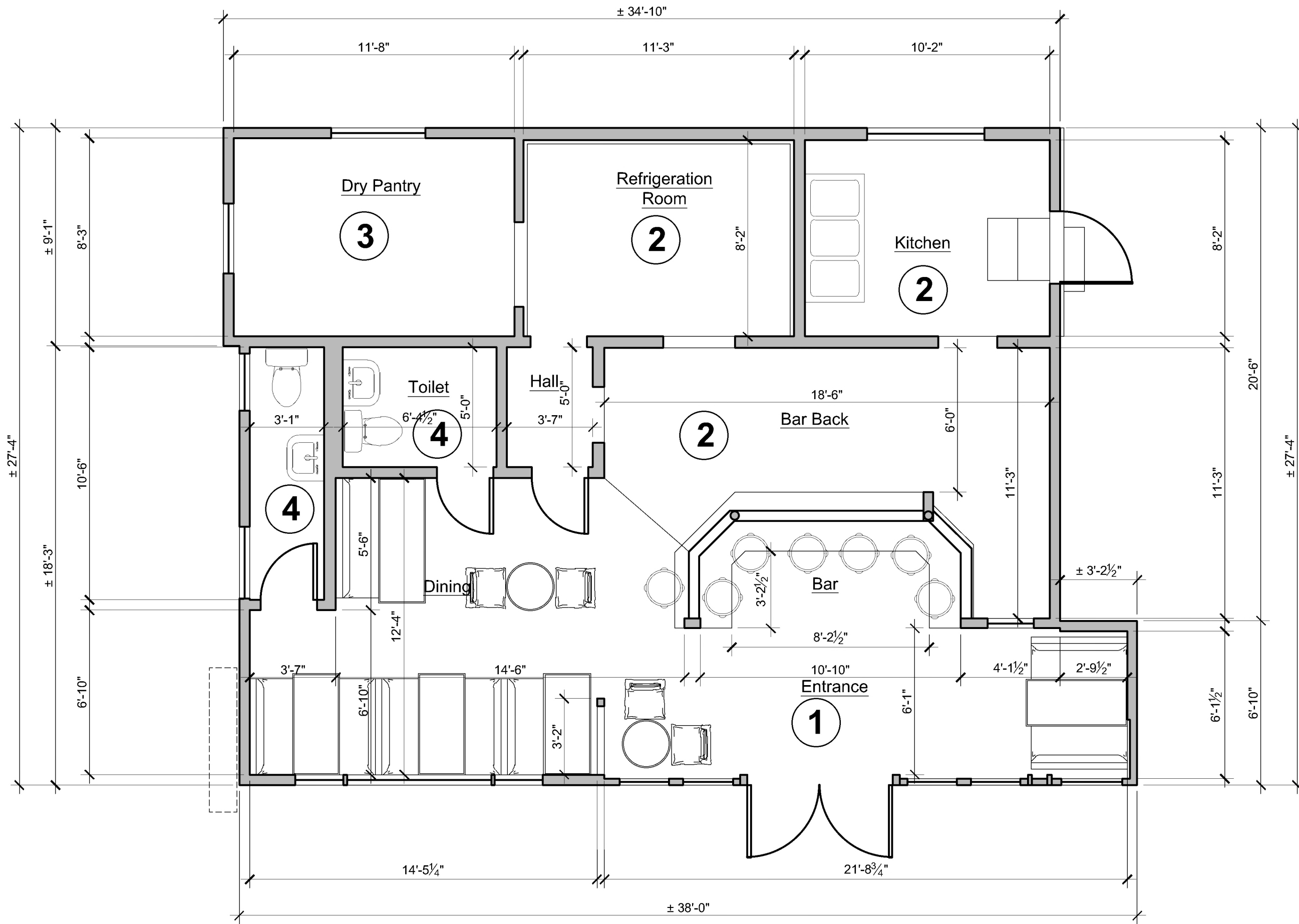


2 EXISTING TILES TO BE REMOVED AND REPLACED

3 EXISTING CONCRETE FLOOR TO REMAIN

4 NEW PLUMBING FIXTURES TO BE INSTALLED
NEW FLOOR TILES

1 EXISTING LINOLEUM TILES TO BE RESTORED.



WALKER'S CAFE

700 Paseo Del Mar
San Pedro, CA 90731

REHABILITATION

Vartan Achabadian
Prospect Group Real Estate
Investments
203 N San Fernando Blvd, Burbank,
CA 91502
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Project Number:

Date:
20 May 2026

File:

Scale:
SCALE AS NOTED

Sheet Title:
Floor Plan
Floor Finishes

Drawing Number:

A2.01

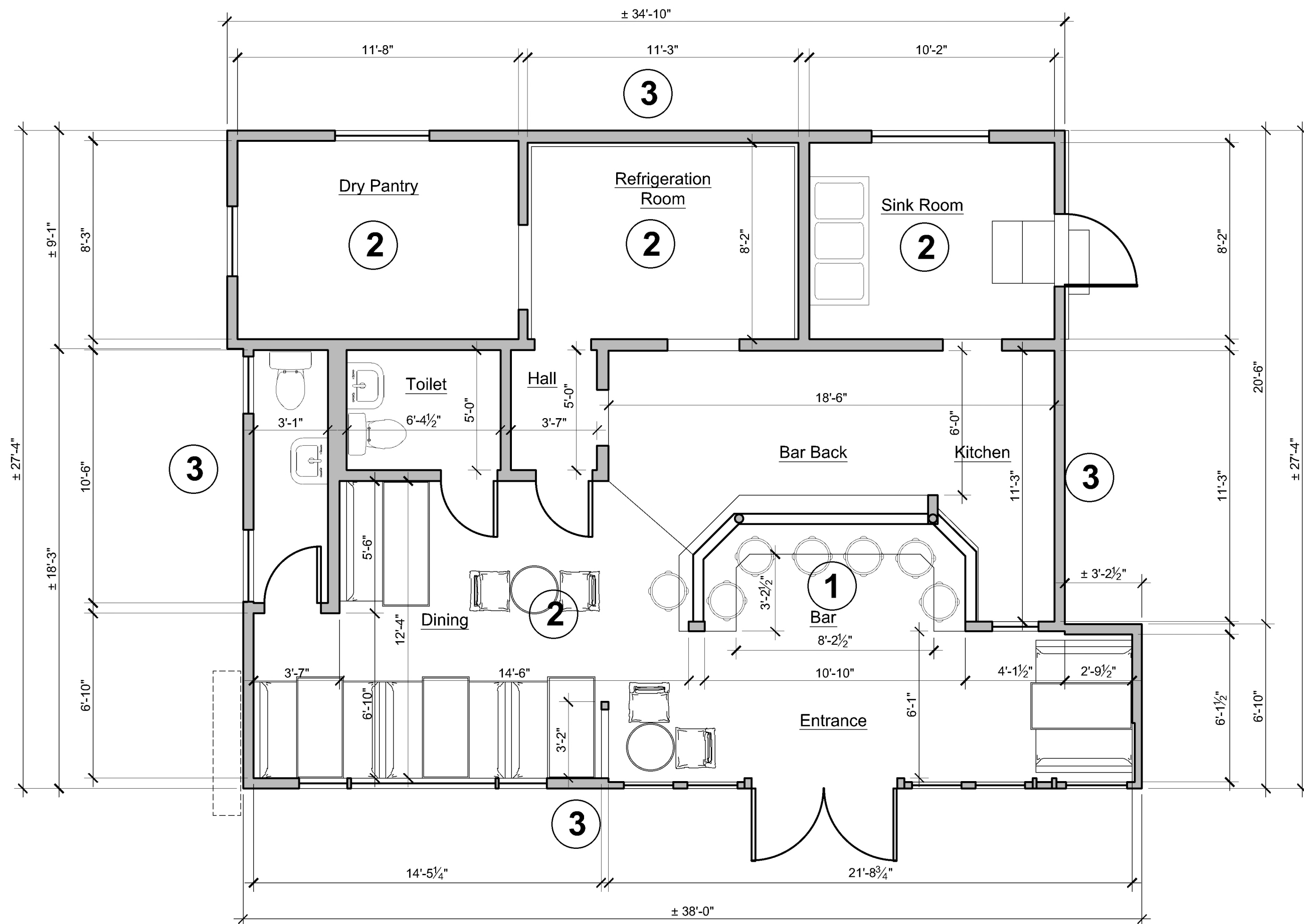


2 EXISTING INTERIOR WALL PAINT TO MATCH EXISTING PAINT

1 EXISTING MENU SIGN TO BE RESTORED



3 NEW EXTERIOR WALL PAINT (POINT FERMIN WHITE)



NOTE:
EXISTING DOORS TO REMAIN
DAMAGED DOORS TO BE REMOVED AND
REPLACED TO MATCH EXISTING
INSTALL NEW HARDWARE

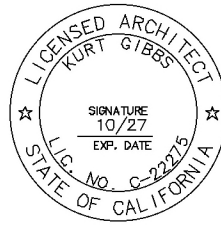


REHABILITATION

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SCALE AS NOTED

Sheet Title:
Floor Plan
Wall Finishes

Drawing Number:



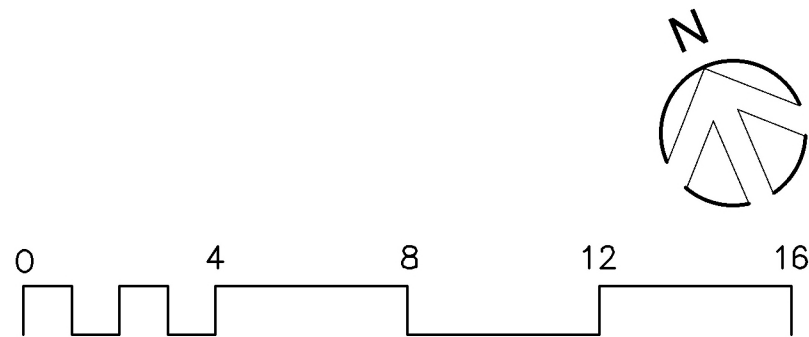
1 EXISTING CEILING TO REMAIN
WALL PAINT TO MATCH EXISTING



2 EXISTING CEILING TO REMAIN
WALL PAINT TO MATCH EXISTING



NOTE:
EXISTING LIGHTING FIXTURE TO REMAIN



WALKER'S CAFE

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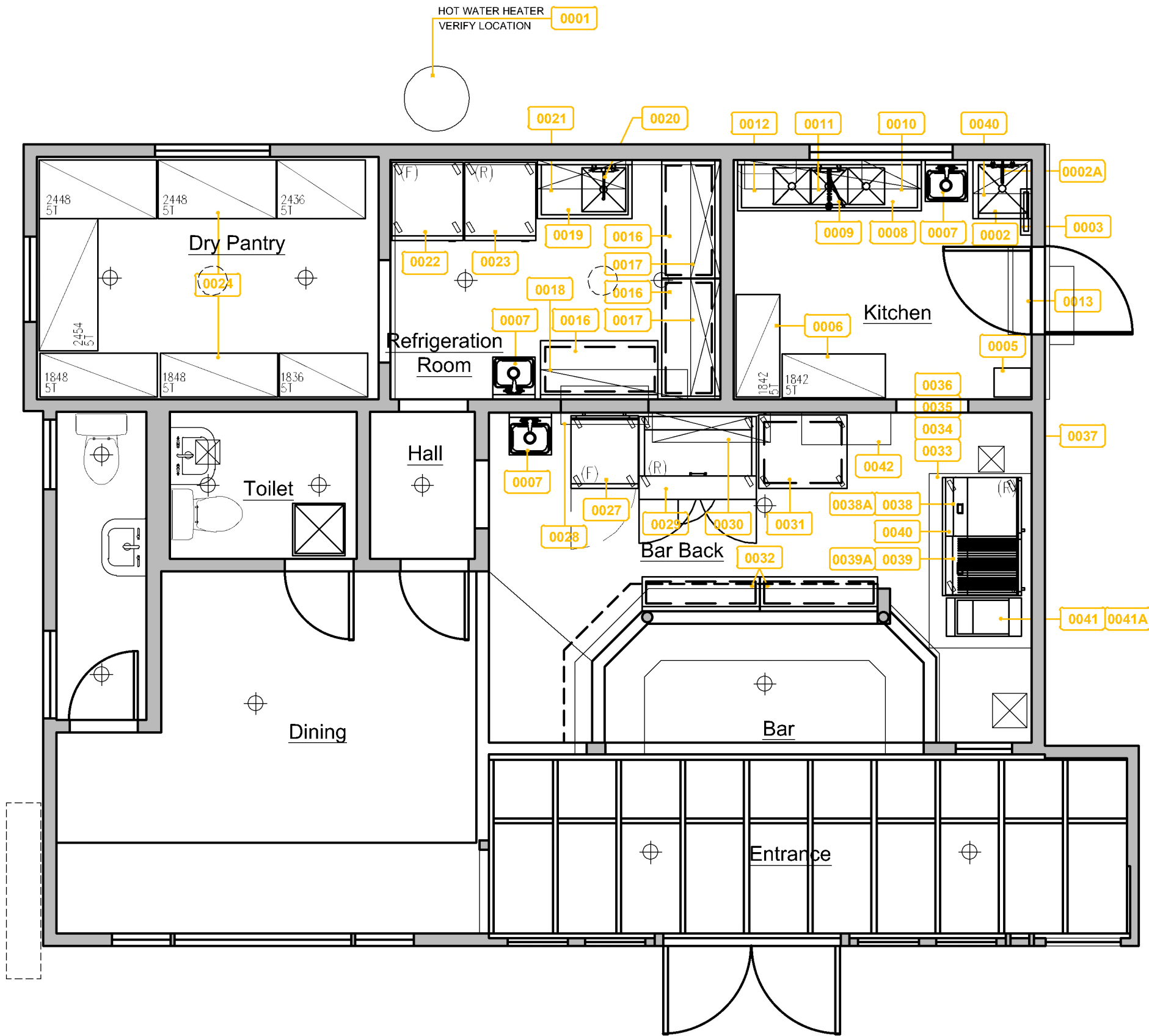
Scale:
SCALE AS NOTED

Sheet Title:
**Ceiling Plan
Finishes**

Drawing Number:

A2.03

DESCRIPTION	ITEM
HOT WATER HEATER	0001
MOP SINK	0002
FAUCET, BACKSPASH MOUNT	0002A
MOP RACK	0003
CHEMICAL STORAGE SHELF	0004
EMPLOYEE LOCKERS	0005
STORAGE SHELVING	0006
HAND SINK, WALL MOUNT	0007
3-COMPARTMENT SINK	0008
COMBINATION PRE-RINSE FAUCET	0009
S/S OVERSHELF	0010
S/S OVERSHELF	0011
DOUBLE POT RACK	0012
AIR CURTAIN, UNHEATED	0013
SPARE NUMBER	0014
SPARE NUMBER	0015
WORKTABLE WITH UNDERSHELF	0016
S/S OVERSHELF	0017
S/S OVERSHELF	0018
PREP TABLE WITH PREP SINK	0019
FAUCET, WALL MOUNT	0020
S/S OVERSHELF	0021
REACH-IN REFRIGERATOR	0022
REACH-IN REFRIGERATOR	0023
STORAGE SHELVING	0024
SPARE NUMBER	0025
SPARE NUMBER	0026
FREEZER, WORKTOP	0027
PASS SHELF WITH FRAME	0028
MEGA TOP PREP REFRIGERATOR	0029
S/S OVERSHELF	0030
MOBILE WORKTABLE W/ UNDERSHELF	0031
WORKTABLE WITH UNDERSHELF	0032
EXHAUST HOOD WITH PSP	0033
EXHAUST AND MAKE-UP AIR FAN SYSTEM	0034
1/2" DIA. ALL-THREAD HOOD HANGER RODS	0035
S/S EXHAUST HOOD CLOSURE PANELS	0036
S/S WALL FLASHING	0037
COUNTERTOP GAS GRIDDLE	0038
GAS CONNECTOR SYSTEM	0038A
COUNTERTOP GAS CHARBROILER	0039
GAS CONNECTOR SYSTEM	0039A
REFRIGERATED, REACH-IN UNDERCOUNTER	0040
GAS FRYER	0041
GAS CONNECTOR SYSTEM	0041A
FIRE SUPPRESSION SYSTEM	0042



Floor Plan Kitchen Equipment

SCALE:1/4" = 1'-0"
FILE:

WALKER'S CAFE

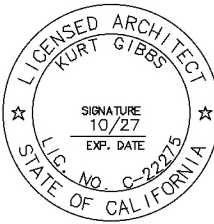
700 Paseo Del Mar
San Pedro, CA 90731

REHABILITATION

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203 N San Fernando Blvd, Burbank,
CA 91502
T:(818) 588 3881



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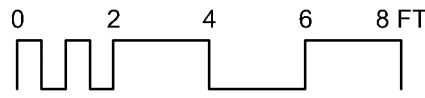
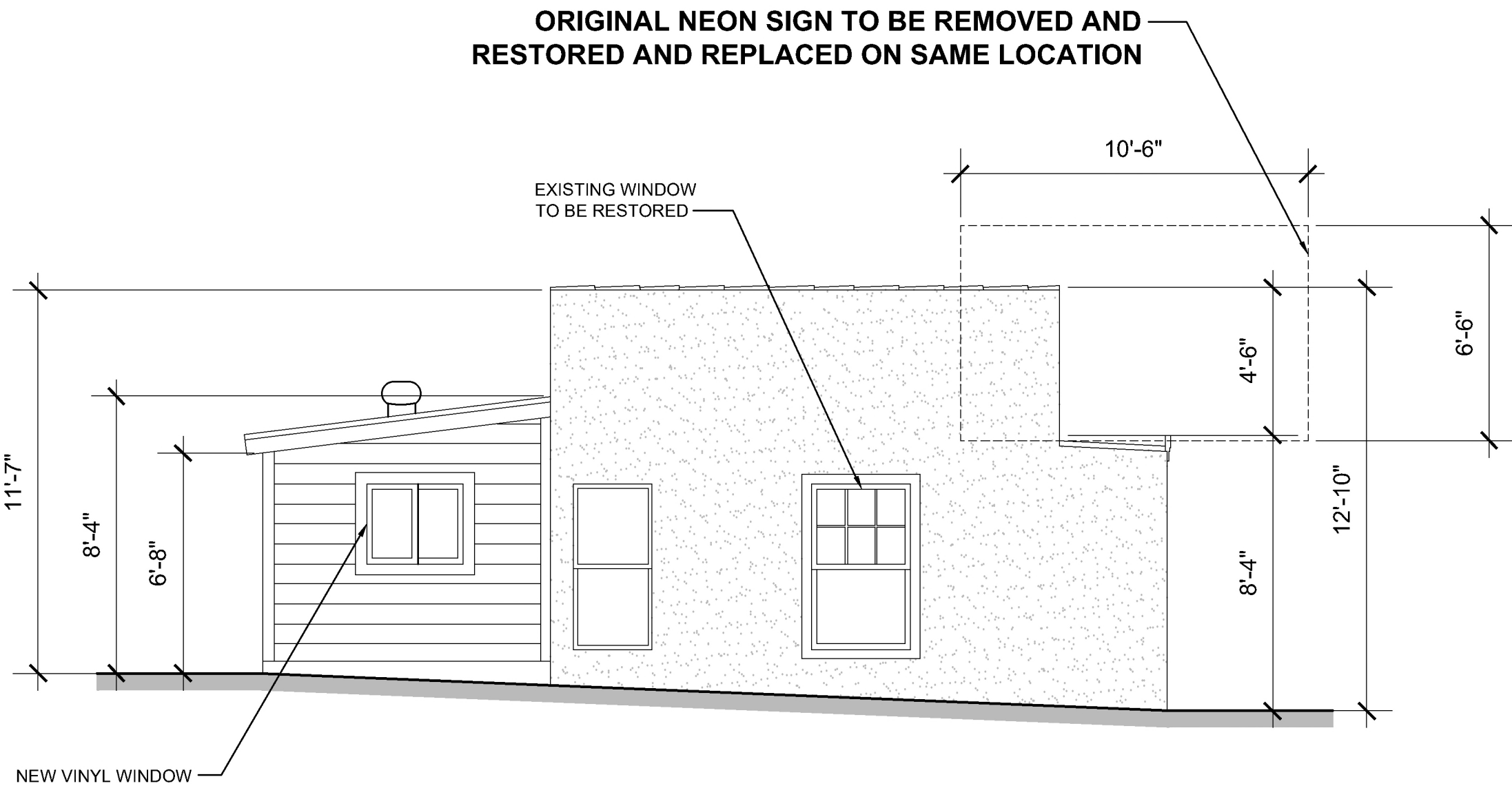
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SCALE AS NOTED

Sheet Title:
**Floor Plan
Kitchen Equipment**

Drawing Number:

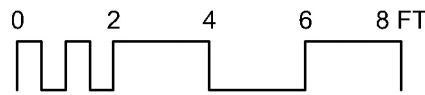
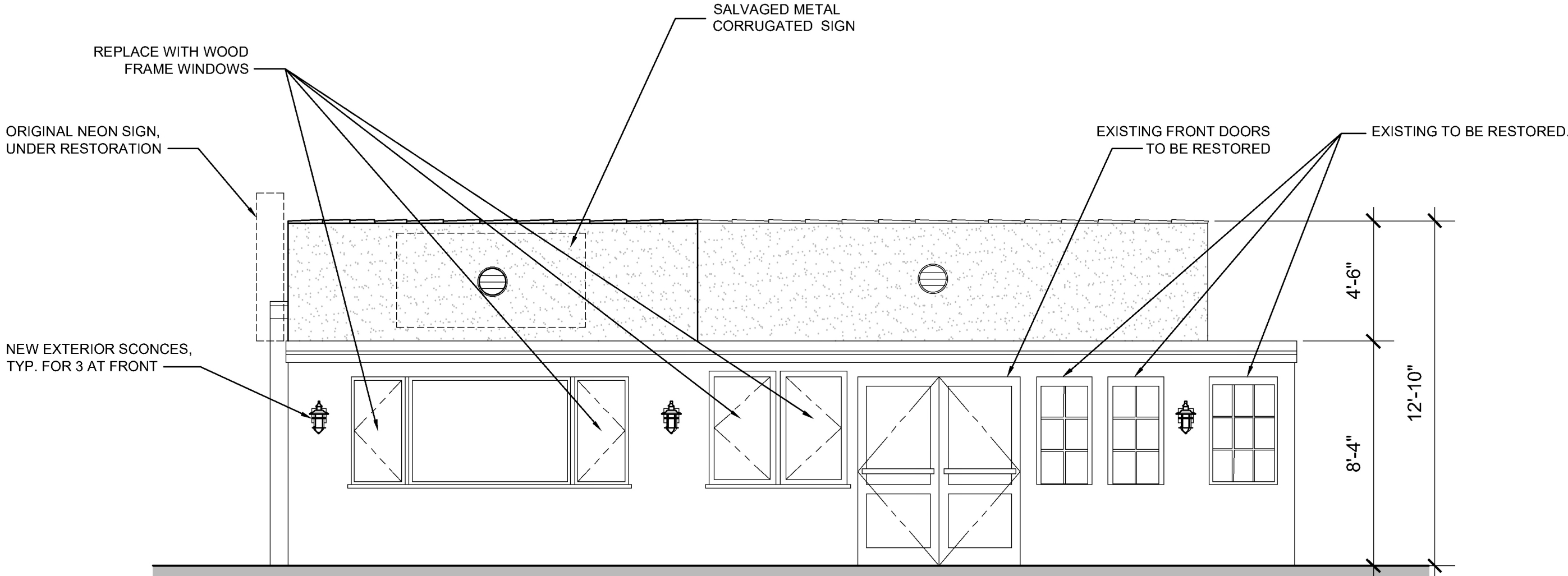
A2.04



Exterior Elevation - West

SCALE: 1/4" = 1'-0"
FILE:

3



Exterior Elevation - South

SCALE: 1/4" = 1'-0"
FILE:

1

WALKER'S CAFE

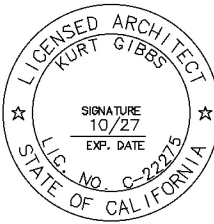
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Date:
20 May 2026

File:

Scale:
SCALE AS NOTED

Sheet Title:

Exterior Elevations

Drawing Number:

A3.01

WALKER'S CAFE

700 Paseo Del Mar

San Pedro, CA 90731

REHABILITATION

Vartan Achabahian

Prospect Group Real Estate Investments

203 N San Fernando Blvd, Burbank, CA 91502

T: (818) 588 3881

GIBBS

ARCHITECTS INC.

Kurt Gibbs AIA

3575 Long Beach Blvd.

Long Beach CA, 90807

T: 562.981.2000

E: kurt@gibbs1934.com

LICENSED ARCHITECT

KURT GIBBS

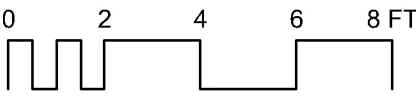
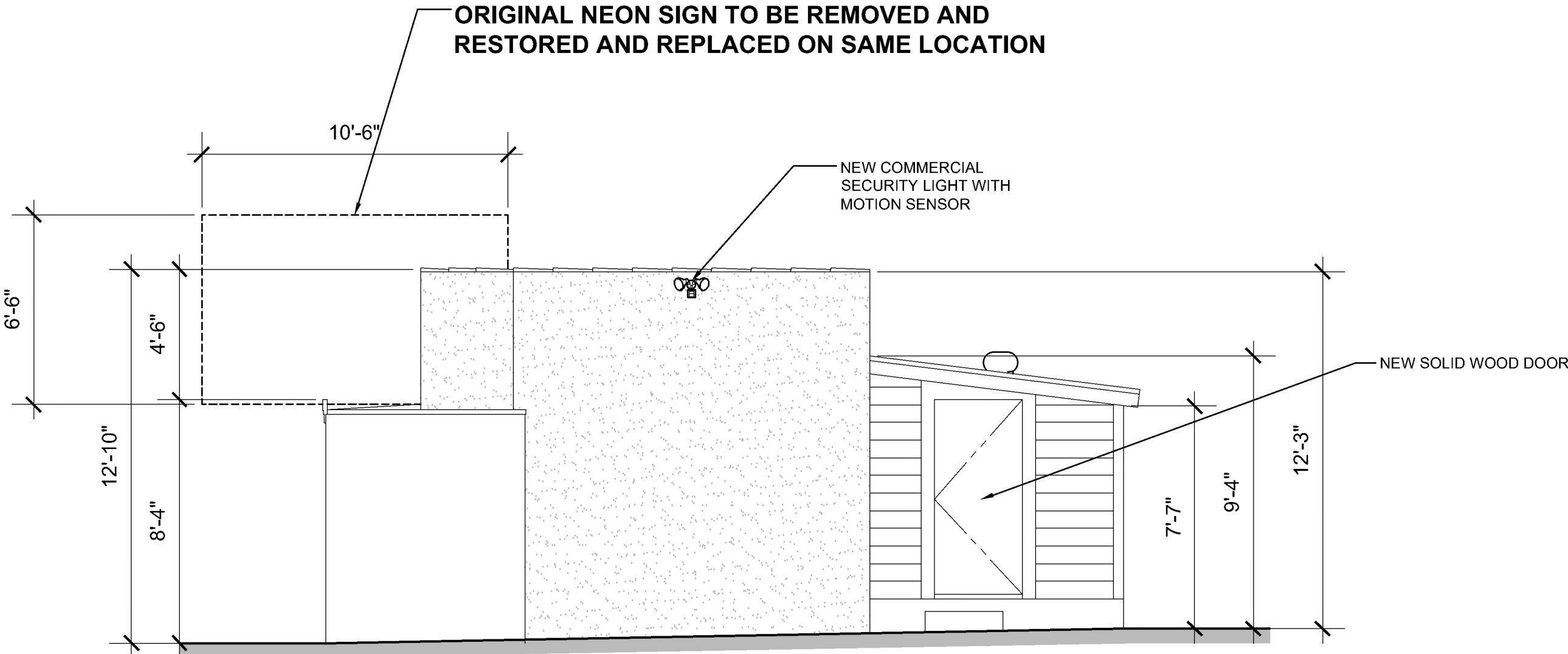
EXPIRATION 10/27

191,495

STATE OF CALIFORNIA

Revisions:

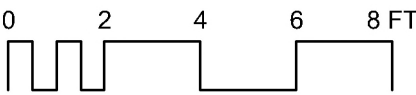
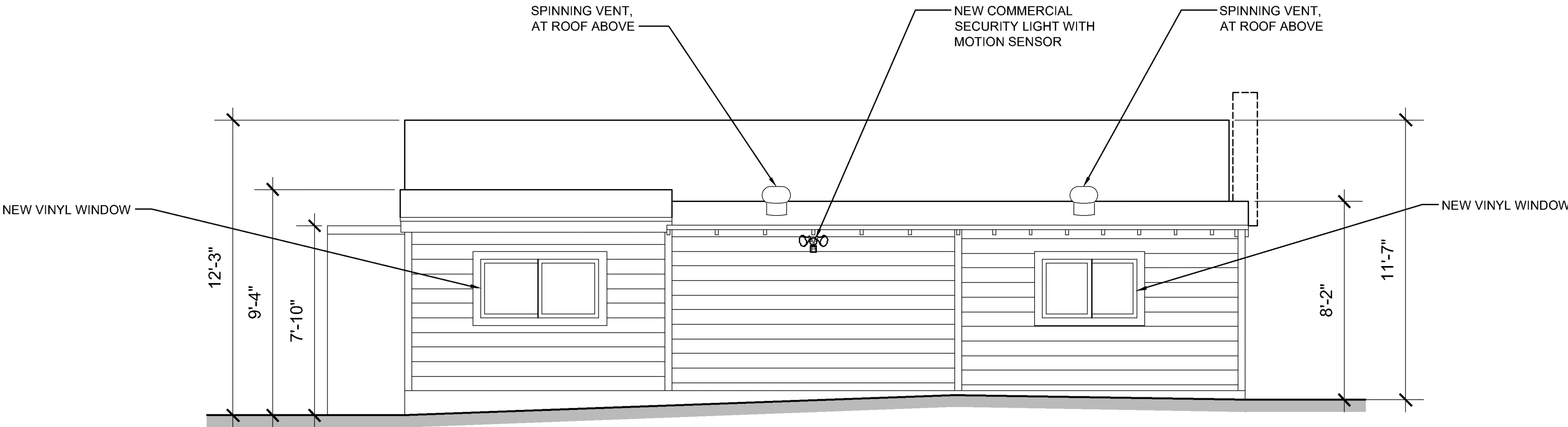
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Project Number:		
Date: 20 May 2026		
File:		
Scale: SCALE AS NOTED		
Sheet Title: Exterior Elevations		
Drawing Number: A3.02		



Exterior Elevation - East

SCALE: 1/4" = 1'-0"
FILE:

3



Exterior Elevation - North

SCALE: 1/4" = 1'-0"
FILE:

1

Attachment D - Parking Inventory on May 10, 2026

Segment Number	Segment	Total Length (ft)	Total Vehicle Capacity	No. of Cars Parked	Number of Parking Spaces Available
1	North side of Paseo del Mar between the Sunken City gate and the edge of the lot	383	21	17	4
2	South side of Paseo del Mar between the Sunken City gate and the edge of the lot	-	71	69	2
3	East side of Gaffey Street between Paseo del Mar and 40th Street	219.67	12	6	6
4	West side of Gaffey Street between Shepard Street and 40th Street	215.33	12	7	5
5	South side of Paseo del Mar between Gaffey Street and "No Parking Sign"	731.9	41	23	18
Total			157	122	35







All Applications Must be Filled Out by Applicant

PLANS AND SPECIFICATIONS
and other data must also be filed

Bldg. Form 2

BUILDING DIVISION

2

DEPARTMENT OF BUILDING AND SAFETY
Application for the Erection of Frame Buildings
CLASS 'D'

To the Board of Building and Safety Commissioners of the City of Los Angeles:
Application is hereby made to the Board of Building and Safety Commissioners of the City of Los Angeles, through the office of the Superintendent of Building, for a building permit in accordance with the description and for the purpose hereinafter set forth. This application is made subject to the following conditions, which are hereby agreed to by the undersigned applicant and which shall be deemed conditions entering into the exercise of the permit:
First: That the permit does not grant any right or privilege to erect any building or other structure therein described, or any portion thereof, upon any street, alley, or other public place or portion thereof.
Second: That the permit does not grant any right or privilege to use any building or other structure therein described, or any portion thereof, for any purpose that is, or may hereafter be prohibited by ordinance of the City of Los Angeles.
Third: That the granting of the permit does not affect or prejudice any claim of title to, or right of possession in, the property described in such permit.

TAKE TO
ROOM No. 6
REAR OF
NORTH
ANNEX
1st FloorCITY CLERK
PLEASE
VERIFYTAKE TO
FIRST FLOOR
242 SO.
BROADWAY
ENGINEER
PLEASE
VERIFY

Lot No. 15 Block 7
(Description of Property)
Pack's Ocean View Tract, San Pedro.
District No. M. B. Page F. B. Page Street
No. 700 Paseo del Mar
4349 Pacific Ave.
(Location of Job)

O. K. City Clerk
By Deputy
O. K. City Engineer
By Deputy

(USE INK OR INDELIBLE PENCIL)

- Purpose of Building garage No. of Rooms 1 No. of Families ----
- Owner's name Felecion Landier Phone -----
- Owner's address same
- Architect's name William E. Durr Phone Sp 1576
- Contractor's name owner Phone -----
- Contractor's address -----
- VALUATION OF PROPOSED WORK {Including Plumbing, Gas Fitting, Sewers, Cesspools, Elevators, Painting, Finishing, all Labor, etc.} \$350.00
- Is there any existing building or permit for a building on lot? yes How used? store
- Size of proposed building 44 x 32 Height to highest point 16' feet
- Number of Stories in height 1 Character of ground adobe
- Material of foundation conc. Size of footings 12 Size of wall 6 Depth below ground 12
- Material of chimneys ----- Number of inlets to flue ----- Interior size of flues -----
- Material of exterior walls wood and corrugated iron
- Give sizes of following materials: REDWOOD MUDSILLS 3 4 Girders -----
EXTERIOR studs 2 4 INTERIOR BEARING studs 2 4 Interior Non-Bearing studs 2 3
Ceiling joists 2 4 Roof rafters 2 4 FIRST FLOOR JOISTS dir
Second floor joists ----- Specify material of roof composition
- Will all provisions of State Housing Act be Complied with? yes

I have ^{What Zoning} carefully examined and read the above application and know the same is true and correct, and that all provisions of the Ordinances and Laws governing Building Construction will be complied with whether herein specified or not.

OVER

(Sign Here)

(Owner or Authorized Agent.)

FOR DEPARTMENT USE ONLY

PERMIT NO. 30005	Plans and Specifications checked and found to conform to Ordinances, State Laws, etc. <u>10/23/24 CUBA</u> Plan Examiner	Application checked and found O. K. <u>10/24/24</u> <u>200 A.B.</u> Clerk	Stamp here when permit is issued RECEIVED OCT 26 1925 100000
----------------------------	--	--	--

Corr 27587 250

APPLICATION	O. K.
CONSTRUCTION	O. K.
ZONING	O. K.
SET-BACK LINE	O. K.
ORD. 33761 (N. S.)	O. K.
FIRE DISTRICT	O. K.

REMARKS

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. There are approximately 20 lines visible. Along the right edge, there are five circular punch holes, evenly spaced vertically. The paper appears slightly aged or off-white. There is no handwriting or printed text on the page.

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
Development Services Center

MELLO ACT
Advisory Notice and Screening Checklist
For Coastal Zone Projects

On January 3, 2001, the Los Angeles City Council entered into a settlement agreement concerning the City's compliance with the Mello Act (California Code Sections 65590 and 65590.1), a statewide law that requires local governments to comply with certain provisions designed to preserve and increase the supply of affordable housing in California's coastal zone. The Mello Act applies to any proposal to convert or demolish existing housing, or to develop new housing in the coastal zone. The purpose of this advisory notice and screening checklist is to determine if your project is subject to the Mello Act, and to inform you of the possible requirements.

Planning Counter Staff must complete this form for all Coastal Zone projects.

STEP ONE. Does the project involve the conversion, demolition or construction of one or more "whole" residential units? Check all that apply.

- ☐ Efficiency dwelling units
☒ One-family dwellings
☐ Two-family dwellings
☐ Structures with three or more dwelling units or efficiency dwelling units
☐ Joint living and work quarters / Artist-in-Residence (AIR) units
☐ Mobile homes
☐ Mobile home lots in a mobile home park
Residential hotel defined in paragraph (1) of subdivision (b) of Section 50519 of the California Health and Safety Code: "Residential hotel means any building containing six or more guestrooms or efficiency units, as defined by Section 17958.1, intended or designed to be used, or which are used, rented, or hired out, to be occupied, or which are occupied, for sleeping purposes by guests, which is also the primary residence of those guests, but does not mean any building containing six or more guestrooms or efficiency units, as defined by Section 17958.1, which is primarily used by transient guests who do not occupy that building as their primary residence."

Section 17958.1 of the Health and Safety Code: "Notwithstanding Sections 17922m 1795b, and 17958.5, a city or county may by ordinance, permit efficiency units for occupancy by no more than two persons which have a minimum floor area of 150 square feet and which may also have a partial kitchen or bathroom facilities, as specified by the ordinance. In all other respects, these efficiency units shall conform to minimum standards for those occupancies otherwise made applicable pursuant to the part "efficiency unit," as used in this section, has the same meaning specified in the Uniform Building Code of the International Conference of Building Officials, as incorporated by reference Chapter 2-12 of Part 2 of Title 24 of the California Code of Regulations."

If no boxes are checked, the project is not subject to the Mello Act and does not require a Mello Act Compliance Review.
Counter Staff: Please indicate below if the proposed project is subject to the Mello Act and complete the information requested.

Subject to Mello Act: (circle) ☒ YES ☐ NO	
Case # (if subject to Mello Act) _____ -MEL	
Project Description: New construction of a Single Family Dwelling with one attached ADU	
Project Address: 700 W Paseo Del Mar, Los Angeles CA 90731	
Owner/Applicant (PRINT): Masis Holdings, LLC (signatory Vartan Achabashian)	
Owner/Applicant Signature: _____ Acknowledgement of Receipt of Copy	DATE: 10/12/23
Planning Counter Staff Person (Print): Spencer Wejrowski	Counter Staff (INITIAL) SW DATE: 12/8/23

If any of the boxes in STEP ONE are checked, proceed to STEP TWO.

STEP TWO. If any of the following questions are answered "YES," the project will require a Mello Act Compliance Review. A public hearing (if required) will not be scheduled, or written determination issued, until a Mello Act Compliance Review has been completed.

Conversion

- Will the project result in a reduction in the existing number of residential units?
 Will the project convert existing rental residential units to for-sale units?
 Will the project convert existing residential units to non-residential uses?

YES	NO
☐	☒
☐	☒
☐	☒

Demolition

- Will the project involve the demolition of existing residential units?

☐	☒
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New Housing Development

- Will the project result in the construction of one or more "whole" residential Units through new construction or adaptive reuse of existing non-residential structures?

☒	☐
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STEP THREE. Does the project, or part of the project, qualify for one or more automatic exemptions? The Mello Act and the Mello Act Settlement Agreement that became effective on January 3, 2001 provides for three exemptions from portions of the Mello Act provisions. These exemptions are:

- ☐ 1. OWNER-OCCUPIED SINGLE-FAMILY RESIDENCE that will be demolished and replaced with a new single-family dwelling for occupancy by the same owner. The Owner/Applicant must complete and submit a Single—Family Dwelling Exemption Affidavit.
- ☐ 2. EXISTING RESIDENTIAL STRUCTURE(S) TO BE DEMOLISHED HAS (HAVE) BEEN DECLARED A PUBLIC NUISANCE by the Department of Building and Safety. *The Owner/Applicant must provide a copy of Notice to Comply or Notice to Demolish.*
- ☒ 3. SMALL NEW HOUSING DEVELOPMENT consisting of fewer than 10 residential units. A new housing development of 9 or fewer residential units is considered a small new housing development.

Please note that these exemptions DO NOT exempt projects from Mello Act Compliance Review: they only limit the scope of review necessary.

Rules for Conversions and Demolitions

- Existing residential units may not be converted or demolished for non-residential uses, unless the City first finds that residential uses are no longer feasible at that site. This rule applies to all existing units, not just affordable units.
- In most instances, converted or demolished existing affordable units must be replaced one-for-one. The Housing and Community Investment Department (HCIDLA) is responsible for determining whether existing residential units qualify as "affordable units." This process may take up to 60 days. While applications will be accepted for filing they will not be "deemed complete" until the HCIDLA HAS COMPLETED ITS REVIEW, AS REQUIRED BY THE Mello Act Settlement Agreement. *It is incumbent on the Owner/Applicant to complete and submit to HCIDLA an Affordable Housing Review Request.*

Rules for New Housing Developments

- **Ten or more units.** New housing developments of ten or more units must provide affordable inclusionary residential units. Owner/Applicants have two options:
 1. 20% of all units must be reserved for low-income households, or
 2. 10% of all units must be reserved for very-low-income households, or
- **Nine or few units.** New housing developments of nine or fewer units are automatically exempt from the requirement to provide inclusionary affordable residential units.

FOR ASSISTANCE AND MORE INFORMATION, PLEASE CONTACT: Juliet Oh | juliet.oh@lacity.org (213) 978-1186.

Attachment F - EnviroStor and GeoTracker Search Results and Current Photos of Garage (Taken 05/26/26)

[illegible]

GeoTracker

Search for a Project

Search for an Address

Home

Download Data

Tools

Contact Us

Map

Satellite

Night Mode

+

-

700 W Paseo Del Mar, San Pedro, CA 90731, USA

LIMIT TO SITES WITHIN

500

FEET OF THIS LOCATION

Go

[REMOVE SEARCH RADIUS](#)

W Paseo Del Mar

Point Fermin Park

Point Fermin Lighthouse

Sunken City

W Paseo Del Mar

W 39th St

W 40th St

South Carolina St

S Gaffey St

Bluff Pl

W 39th St

W 40th St

S Pacific Ave

Pacific Overlook

LEGEND - CHOOSE MORE SITES

LUST Cleanup Sites - REMOVE

Cleanup Program Sites - REMOVE

Military Cleanup Sites - REMOVE

Military Privatized Sites - REMOVE

Military UST Sites - REMOVE

Military UST Privatized Sites - REMOVE

☒ Signifies a Closed Site

ACTIVE MAP COVERAGES:

Military Bases - - REMOVE

SITES VISIBLE ON MAP - CHOOSE FIELDS

SITE NAME

STATUS

Sites Shown on Map:

0 Total Sites

0 Open Sites

0 Closed Sites

0 Sites w/Water Quality Data

Keyboard shortcuts

Map data ©2026 Google

50 m

Terms





