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**Re: DIR-2019-6352-CDP-MEL (SHP 1);  
DIR-2019-5524-CDP-MEL (SHP 2); ZA-2019-5525-ZAD;  
DIR-2019-5571-CDP-MEL (JDR 1); ZA-2019-5574-ZAD;  
DIR-2019-5584-CDP-MEL (JDR 2); ZA-2019-5585-ZAD;  
CEQA No.: ENV-2019-5520-MND**

**Date 4/29/24**

To Whom It May Concern:

Enclosed are our findings regarding the Environmental Impact Analysis of ENV-2019-5520-MND for the proposed development, specifically **I AESTHETICS, XI LAND USE AND PLANNING** and **XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

***Points of analysis:***

1. The magnitude of the proposed development does **not** warrant a simple MND and will create a dangerous precedent not only for the area, but for the city as a whole. The lack of proper environmental research violates CCA Section 30253 (a) (b) (c) (d). Errors, inconsistencies and omissions in the initial environmental checklist of the application are shown below. (EXHIBIT F) As a matter of fact, the entire MND fails to mention the California Coastal Act or the Dual Jurisdiction Coastal Zone location in any of its sections, and the CCC is *not* listed as a public agency, who's approval is required (EXHIBIT F center).
2. The local portion of PCH is eligible for a scenic designation per CalTrans documents. Further, according to a CCC staff report with Application No.5-18-0393, the subject site is located "*within an area that is designated in the California Coastline Preservation and Recreation Plan as highly scenic for preserving landscaping and recreation resources due to its visibility from Will Rogers State Beach. Visual resources to be protected include hillside development that is visible from PCH, which provides public views of the ocean and the surrounding area*". Contrary to the initial study environmental impact findings, the development will introduce incompatible visual elements to the project site and would *not* be consistent with the neighborhood's single-family residential character as viewed from the surrounding areas, PCH and the beach. (EXHIBITS A and B)
3. The proposed development is **incompatible** with the intent of LAMC 12.21.C.10 (BHO) and violates CCA, Chapter 3 Article 6, Sections 30251, 30253 (a) (b) (c) (d). The typical lot size in R1-1 Zone is 5,000 SF. Many of the properties in the area are substandard, as are the hillside streets. The projects exceed the average bluff home size on Tramonto and Vicino x5 and x2 to x5 on adjacent Revello, Posetano, Stretto and Castellammare. (EXHIBIT A) This is a clear lack of compliance with the *Zoning intent of the LAMC* and CCA 30251, as the massive volumes alter natural forms and

overtake public views with the appearance of a small to medium residential hotel. There are also very large flat pads and even open rooftop, ocean facing ADU parking, non-characteristic for the neighborhood. Further, the proposed development's mass and sizing clearly violate Section 30251, and 30253 (b) as they export nearly 34,000 CY of natural coastal bluff, which still does not include caisson excavation and additional applicable earthwork. (EXHIBIT B)

4. Combining three or more lots to design bigger homes results in ~200' uninterrupted frontage on the planned Revello extension. The over 6' high solid facade will have a potentially significant negative impact on public views from the public right-of-way, which could have been prevented if smaller R-1 Zone homes with appropriate side yards were to be build. (EXHIBIT B)
5. Furthermore, the granted Building Code exemption allowing 0' toe of slope clearance brings in a min 10' (~one story) extension of the rear retaining walls of the Revello homes, required by geology as impact device. They contribute to the overall building height. (EXHIBIT C) The specific example of 17523 Revello exhibits around 48' and 50' total coastal building height, as well as 36' plumb hillside grade height, where a 28' envelope should be observed. This violates both CCA Section 30251, 3053 (b), as well as the BHO.
6. Even after revisions made during the CDP process, the proposed development is still utilizing the sunken portion of the Tramonto public right-of-way as main access to the top residence, with the clear intent to use such portion to a private access road for the newly purchased lots on the same block. Contrary to the MND statement, this is inconsistent with the general plan use of public land and will, in fact, obstruct the implementation of the applicable land use plan and regulations. The proposed partial retaining wall will prevent necessary bulkhead maintenance and the Tramonto regulated paved width of 36' will never be restored at any point in the future. (EXHIBIT D)
7. The Project does not minimize risks to life and property in areas of high geologic, flood, and fire hazard as required per CCA, Chapter 3 Section 30253 (a). On the contrary, they increase that with a potentially significant impact. Besides the concerns discussed in the geology section, 3 of the 4 homes are located on Revello Dr. It includes a 12'-4" wide segment that is narrowed and partially collapsed due to the Revello Slide about 500 feet preceding the 20' wide street portion, where the projects and the proposed 200-foot street extension would be located. (EXHIBIT D)
8. The decision to relieve compliance with LAMC 12.21.C-10(i) is also an error - it is based on incorrect street access findings and unwarranted local fire access clearance. CPRC §4290 prohibits local fire officials from overriding CA State fire access requirements in a Very High Fire Hazard Severity Zone; the projects are located in such and the ZA has no authority to do so either.
9. The proposed extension of Revello drive reverses the natural incline of the street and constitutes a major natural landform modification, violating CCC §30253 (a) and (b), creating a 17' retaining wall in the middle of the PROW, which cuts off the street and access for adjacent property owners. Moreover, it will make future reconnection of the street impossible, since any incline from the resulting and existing connection points will violate the maximum 15% street slope allowed by LAMC. It will clearly cause a physical divide of the community. (EXHIBIT E)
10. The development plans of the Tramonto home still show unlawful appropriation of public land, as pad, along with retaining walls, caissons and fill extend over 510 SF of the public right-of-way. (EXHIBIT H top)
11. Circular reasoning is prevalent throughout the MND's factual statements and conclusions. As a result, the MND is flawed and the project may in fact have a significant environmental impact, thus warranting a full EIR. The proposed development relies heavily on future compliance verification of elements pertaining to the CDP incorporating said MND. The CDP and MND, as shown herewith, exhibit errors, omissions, inconsistencies and non-mitigable conditions (EXHIBITS A-F). This meets the criteria of both LAMC 11.02 "Inconsistent Permits and Licenses" and LAMC 12.20.2.J.1 "CDP Revocation", making such permit invalid and void.
12. Contrary to the MND Mandatory Findings of Significance, the projects **will** have a serious cumulative impact, which is not accounted for in the MND (EXHIBIT H bottom). The MND conclusion statement that *"the incorporation of standard conditions of approvals, project design features, and mitigation measures, the Project's individual-level impacts would be reduced to less than significant levels, which would, in turn, reduce the potential for these impacts to be considered part of any possible cumulative impact"* uses once again circular logic and flawed math - the sum cannot be smaller than the aggregate of its parts, the arithmetic is rather simple. The Initial Study persistently downplays the environmental impacts of the projects (EXHIBIT I); throughout the document there are many incomplete and misleading findings, in turn resulting in erroneous determinations.

***Conclusion:***

As demonstrated herein, the proposed development would have a potentially very significant environmental impact. It fully warrants an Environmental Impact Report, starting with the fact, that it is indeed located on a massive and active landslide in a scenic Coastal bluff area, Dual Jurisdiction Coastal, Special Grading, Very High Fire Hazard Severity Zone. The adopted ENV-2019-5520-MND should be reversed and an **EIR**, prepared by an independent agency not affiliated with the proposed development, should be produced for public review and comments.

Sincerely yours,

**IVO VENKOV**

Ivo Venkov  
Architect

IV/RV  
ec/file

NEIGHBORHOOD HOME SF COMPARISON CHARTS

TRAMONTO/VICINO TOP OF BLUFF HOMES

ADDRESS	BUILDING AREA per ZIMAS	SF	LOT AREA
17526 TRAMONTO	2,795	sf	0.239 ac
17612 TRAMONTO	2,792	sf	0.352 ac
17624 TRAMONTO	2,067	sf	0.181 ac
17630 TRAMONTO	3,169	sf	0.323 ac
17642 TRAMONTO	5,607	sf	0.388 ac
BASEMENT (HAB)	3,467	sf	
17646 TRAMONTO	4,383	sf	0.202 ac
17708 TRAMONTO	2,915	sf	0.444 ac
17726 TRAMONTO	2,765	sf	0.177 ac
17732 TRAMONTO	3,291	sf	0.143 ac
17750 TRAMONTO	2,581	sf	0.146 ac
17756 TRAMONTO	3,087	sf	0.235 ac
17762 TRAMONTO	1,731	sf	0.349 ac
17774 TRAMONTO	1,829	sf	0.375 ac
17782 TRAMONTO	6,046	sf	0.481 ac
17810 TRAMONTO	1,525	sf	0.23 ac
17822 TRAMONTO	1,595	sf	0.143 ac
17832 TRAMONTO	4,273	sf	0.143 ac
AVERAGE	3,289		0.268 ac
17538-17550 TRAMONTO	14,928	sf	0.518 ac
RFA	9,051	sf	
BASEMENT (HAB)	5,877	sf	
17850 VICINO	4,126	sf	0.119 ac
17856 VICINO	1,759	sf	0.11 ac
17862 VICINO	1,898	sf	0.112 ac
17868 VICINO	3,644	sf	0.149 ac
17876 VICINO	2,860	sf	0.159 ac
17880 VICINO	3,040	sf	0.218 ac
AVERAGE	2,888		0.145 ac

AVERAGE SF  
ONLY ~3,000 SF

LOT SIZE IS X2 TO X4  
LARGER THAN AVERAGE  
NEIGHBORHOOD LOT

WEST REVELLO DR

ADDRESS	BUILDING AREA per ZIMAS	SF	LOT AREA
17407 W REVELLO	10,618	sf	0.623 ac
17415 W REVELLO	2,377	sf	0.171 ac
17419 W REVELLO	1,632	sf	0.12 ac
17433 W REVELLO	1,870	sf	0.13 ac
17455 W REVELLO	3,218	sf	0.177 ac
17461 W REVELLO	1,976	sf	0.232 ac
17475 W REVELLO	7,321	sf	0.304 ac
17400 W REVELLO	2,319	sf	0.161 ac
17404 W REVELLO	1,831	sf	0.165 ac
17408 W REVELLO	2,948	sf	0.162 ac
17410 W REVELLO	2,905	sf	0.156 ac
17416 W REVELLO	2,248	sf	0.141 ac
17420 W REVELLO	1,632	sf	0.127 ac
17426 W REVELLO	2,937	sf	0.14 ac
17432 W REVELLO	1,936.0	sf	0.163 ac
17438 W REVELLO	2,511	sf	0.163 ac
17440 W REVELLO	2,871	sf	0.157 ac
17446 W REVELLO	2,407	sf	0.099 ac
17452 W REVELLO	1,395	sf	0.106 ac
17480 W REVELLO	3,053	sf	0.098 ac
17520 W REVELLO	3,459	sf	0.086 ac
AVERAGE	3,022		0.175 ac
17523-17529 REVELLO	5,047	sf	0.191 ac
RFA	2,619	sf	
BASEMENT (HAB)	2,428	sf	
17532-17548 REVELLO	9,296	sf	0.263 ac
RFA	4,160	sf	
BASEMENT (HAB)	5,096	sf	
17533-17547 REVELLO	14,027	sf	0.374 ac
RFA	6,078	sf	
BASEMENT (HAB)	7,949	sf	
NEW W REVELLO AVERAGE USING RFA ONLY	3,318		
NEW W REVELLO AVERAGE USING TOTAL FA	3,991		

ADDITION OF PROPOSED  
REVELLO DEVELOPMENT WILL  
ENLARGE AVERAGE SF BY 30%!

W POSITANO/STRETTO/W CASTELLAMMARE

ADDRESS	BUILDING AREA per ZIMAS	SF	LOT AREA
17445 W POSETANO	2,399	sf	0.096 ac
17437 W POSETANO	2,201	sf	0.1 ac
17411 W POSETANO	3,956	sf	0.249 ac
17406 W POSETANO	2,992	sf	0.091 ac
17432 W POSETANO	1,207	sf	0.086 ac
17440 W POSETANO	1,856	sf	0.089 ac
17500 W POSETANO	3,664	sf	0.097 ac
17510 W POSETANO	2,047	sf	0.038 ac
17538 W POSETANO	1,282	sf	0.1 ac
17530 W STRETTO WAY	3,986	sf	0.096 ac
17520 W STRETTO WAY	3,369	sf	0.09 ac
17517 W STRETTO WAY	1,468	sf	0.112 ac
17501 W CASTELLAMMARE	3,998	sf	0.097 ac
17447 W CASTELLAMMARE	1,005	sf	0.093 ac
17415 W CASTELLAMMARE	4,350.0	sf	0.092 ac
17405 W CASTELLAMMARE	4,036	sf	0.09 ac
17434 W CASTELLAMMARE	1,856	sf	0.083 ac
17518 W CASTELLAMMARE	5,053	sf	0.225 ac
AVERAGE	2,818		0.107 ac

AVERAGE SF  
ONLY ~2,800 SF

THE ENCLOSED CHARTS  
SHOW NEIGHBORHOOD  
BLUFF PROPERTIES VISIBLE  
FROM THE BEACH,  
COMPARABLE BY  
PROXIMITY AND LOCATION -  
CCA SECTION 30251



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ZA-2019-5585-ZAD; CEQA No.: ENV-2019-5520-MND



A SINGLE HOME OF THE PROPOSED DEVELOPMENT HAS  
3 TO 4 TIMES THE AVERAGE HOME WIDTH  
OF PRESENT HOMES ON THE BLUFFS  
~ 200'!

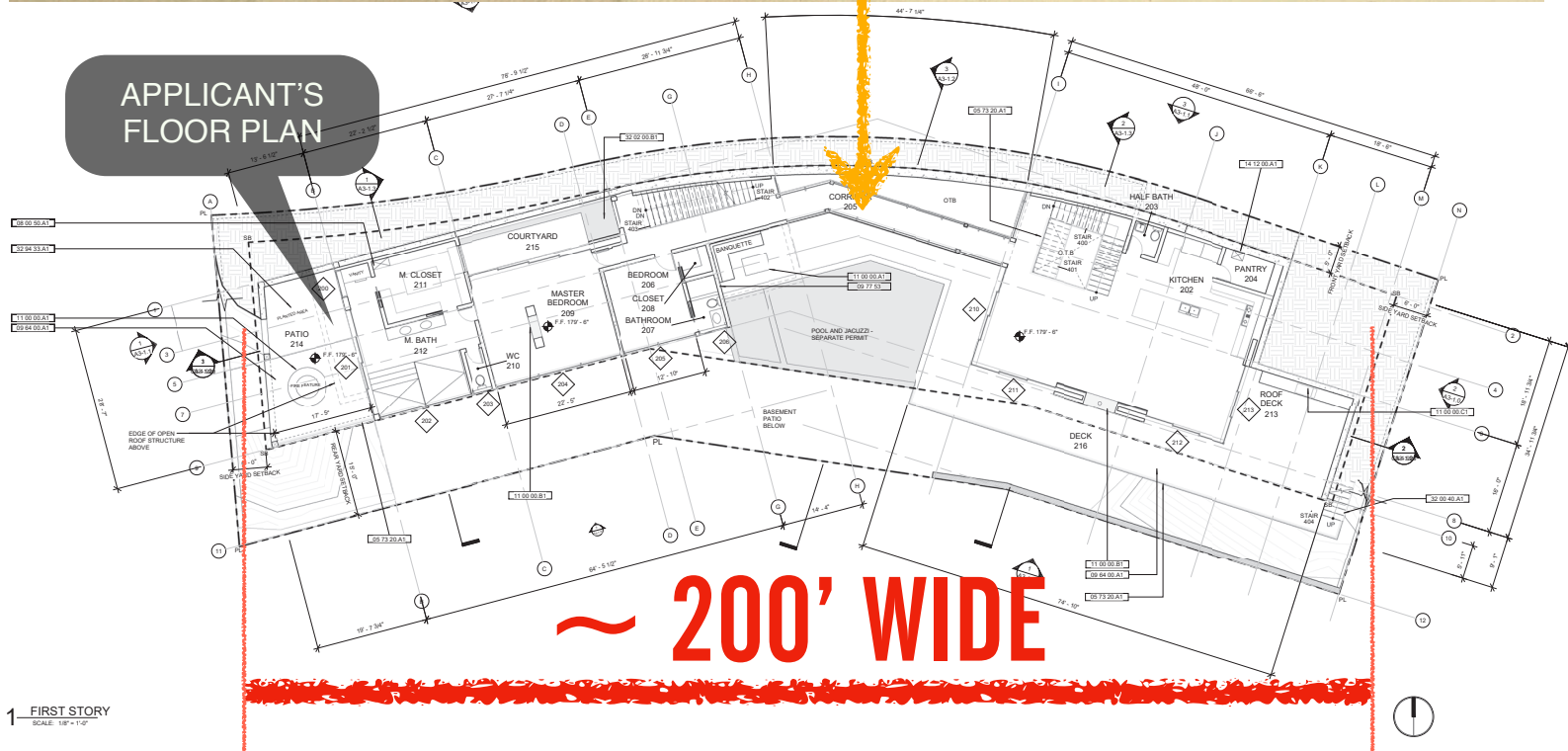
AVERAGE HOME WIDTH  
1 BLOCK DOWN

AVERAGE HOME WIDTH  
1 BLOCK DOWN



APPLICANT'S VISUAL STUDY

APPLICANT'S  
FLOOR PLAN



1 FIRST STORY  
SCALE: 1/8" = 1'-0"





SINGLE FAMILY  
HOME VISUAL  
COMPATIBILITY  
IN R-1 ZONE





PROPOSED 17532 REVELLO HOME  
WIDTH OF OVER 200'!

17520 REVELLO  
BUILD 1927



EXTENDED SINGLE MASS OF NEW DEVELOPMENT  
OVER THE SCENIC VISTA OF THE CASTELLAMMARE  
BLUFFS DWARFS EXISTING HOMES

SINGLE FAMILY  
HOME VISUAL  
COMPATIBILITY  
IN R-1 ZONE

