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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

May 1, 2021

SENT VIA EMAIL to apcwestla@lacity.org

West Los Angeles Area Planning Commission
c/o Planning Commission Office, Department of City Planning
200 North Spring Street, Room 272
Los Angeles, CA 90012
Attention: James K. Williams, Commission Executive Assistant

Re: Agenda Items 6 & 7, WLA APC Meeting of May 5, 2021
Case Nos. DIR-2019-2610-CDP-MEL-1A; AA-2019-2609-PMLA-SL-1A ("Project")
315 6th Avenue, Venice ("Property")

Members of the Commission:

The undersigned represents Project proponent 315 6th Avenue LLC, the applicant and owner of the above captioned Property site. This letter is submitted in support of the Project and in opposition to the appeals filed.

Prior to responding to the relevant issues raised by the Appellants in their appeals of the above captioned cases, and for the focused review by the Commission members, please find below the recommendations of the City Planning Department staff found in their Appeal Recommendation Report (Recommendation Report):

Recommended Actions for Case No. AA-2019-PMLA-SL-1A:

- 1. DENY the appeal**
- 2. SUSTAIN the determination of the Advisory Agency to conditionally approve Preliminary Parcel Map No. AA-2019-2609-PMLA-SL**

Recommended Actions for Case No. DIR-2610-CDP-MEL-1A:

- 1. DENY in part the appeal and GRANT in part the appeal to SUSTAIN the determination of the Director of Planning to conditionally approve a Coastal Development Permit and Mello Compliance Review for the proposed project in the single jurisdiction area of the Coastal Zone.**
- 2. ADOPT the amended Findings attached as Exhibit A to the Recommendation Report.**

Please be advised the Project proponent fully supports and joins in all of the recommendations and analyses detailed in the Recommendation Report and joins with staff in advocating the denial of the subject appeals.

In support of the denial of the subject appeals, please find discussed below my client's response and opposition to the below noted selected appeal issues propounded by the Appellants:

1. Appellant Appeal Issue: ...” *The Director errs in that there is no evidence that the design or improvement of the proposed subdivision is consistent with applicable General (including LUP) and Specific Plans...* ”

Applicant Response: As stated by staff in the Recommendation Report, “The Advisory Agency made the required findings in the California Subdivisions Map Act (Government Code Sections 66473.1, 66474.60 and .63) to approve a preliminary parcel map for the subdivision of a residential lot into two (2) small lots, consistent with the requirements of the Small Lot Ordinance...Furthermore, the project is consistent with the applicable provisions of the General Plan, Venice LUP, Specific Plan and LAMC, as discussed in the Advisory Agency decision...”

2. Appellant Appeal Issue: “*The proposed project would result in a loss of density and would not preserve overall density in an area able to accommodate it, and thus is inconsistent with the Coastal Act Section 30250.*”

Applicant Response: Supported by the definition of an Accessory Dwelling Unit (“ADU”) found in LAMC Section 12.03, and quoting from the Recommendation Report,... “The project will replace four single-family dwellings with four dwellings units comprised of a new single-family residence and ADU on two small lots. The proposed development complies with the density limitations of the Specific Plan and would preserve the existing density of the subject site.”

3. Appellant Appeal Issue: “*Subdividing lots and conversion of multi-family housing in the Venice Coastal Zone subverts Neighborhood Character.*”

Applicant Response: In support of the fact that the Project conforms to the character, mass and scale of the surrounding neighborhood, the Applicant has previously submitted to City Planning staff a Planning and Neighboring Buildings Height and Context Study demonstrating that the proposed Project is consistent with the neighborhood scale and character with respect to architectural style, height, massing, and setbacks. The residences which are 30 feet in height, are located within the Southeast Venice Subarea, and complies with the allowable varying building height of 30 feet with a flat roof. The proposed three-story residences are comparable in height with many of the residential dwellings in the immediate vicinity. In addition, the proposed square footage size of the dwellings does not maximize the allowable buildable area for the Project site as specified in the Venice Specific Plan guidelines and the provisions of the City of Los Angeles Municipal Code. The varied styles of

architecture is encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing. As detailed on the submitted revised Project plans, and as compared to the surrounding properties, the proposed Project is consistent with the mixed architectural styles and lot patterns of the subject neighborhood and the Southeast Venice Subarea.

4. Appellant Appeal Issue: *"The adverse cumulative impact and change to the character of the neighborhood due to the loss of four replacement affordable low-income units was not considered...all four were determined by HCID to be Mello replacement affordable units. DCP has erred in accepting a feasibility study in order to determine the replacement of existing affordable housing is infeasible ..."*

Applicant Response: Pursuant to a Feasibility Study for Mello Act Determination prepared for the Property site and submitted by the independent consulting firm of Howard Robinson & Associates, the finding of said study indicates that it is financially infeasible to develop affordable single-family residences and that off-site replacement projects are similarly infeasible. Quoting from the Recommendation Report.... "Part 8.0 of the Interim Administrative Procedures for Complying with the Mello Act (IAP) states Appellants have the burden of proof and shall present substantial evidence to support their appeal. The Appellant has not provided substantial evidence to support their claim the decision-maker has erred...As such, no Affordable Units are required for this project" (emphasis added).

5. Appellant Appeal Issue: *"... the City should prepare a cumulative effects analysis, required by Section 30105.5 of the Coastal Act."*

Applicant Response: As stated in the Recommendation Report, "Section 30250 [Coastal Act] requires the Director to determine whether this existing developed area can "accommodate" the new development. While the term "accommodate" is not defined in the Coastal Act, a common understanding for the term is: 1. (of physical space, especially a building) provide lodging or sufficient space for." The project proposes to keep the same number of dwelling units on site by replacing the 4 existing dwelling units with an equal number of dwelling units...The findings of the Advisory Agency in the parcel map decision have determined that the proposed project site must meet the required off-street parking requirements; observe the required setbacks; provide five-foot-wide common access easement; comply with the Small Lot Design Standards; comply with landscape requirements; and meet all of the Bureau of Engineering Standard Conditions and parcel Map requirements under LAMC 17.00...As such, substantial evidence supports the Director's determination that the development is located in an existing developed area that is able to accommodate it..." (emphasis added).

In conclusion of the Applicant's rebuttal of certain appeal points raised by the Appellants, and once again quoting from the Recommendation Report, "Staff recommends the Commission deny the appeal and sustain the decision of the Advisory Agency to approve Parcel Map No. AA-2019-2609-PMLA-SL and map stamp-dated March 31, 2020 and deny in part and grant in part the appeal to sustain the determination of the Director of Planning to approve a Coastal Development Permit and Mellow Act Compliance Review..."

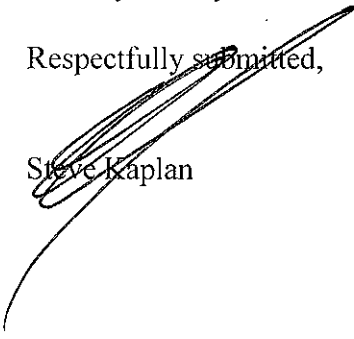
The undersigned, in close of this subject submission in opposition to the appeals filed in this matter, would like to bring to the attention of the West Los Angeles Area Planning Commission a previous decision made by the Commission in the Case No. DIR-2016-3291-CDP-MEL-1A ("San Juan case") for a project located at 635 East San Juan Avenue in Venice. By way of background, and as certain members of the Commission may remember, the San Juan project was approved by the Planning Director on June 28, 2019. On November 20, 2019, the Commission denied the appeal filed in said matter. Thereafter, on February 5, 2020, at the urging of the Office of Council District 11, the City Council pursuant to Charter Section 245 asserted jurisdiction over the November 20, 2019 action of the Commission and remanded the decision back to the Commission. Although the Commission on 11/20/2019 voted unanimously 4-0 to deny the subject appeals filed in said San Juan case, and with no facts concerning the project changing in any way (other than possible political considerations) upon being remanded back to the Commission, the Commission subsequently reversed its previous decision and on March 4, 2020 voted 4-0 to support the appeal and to deny the project.

The design and implementation of the subject cases before you now, just like the previous San Juan case, meet all the present LAMC and Venice area requirements as well as current California Coastal Commission policies. Although changes may be forthcoming with respect to the adoption of a new City of Los Angeles ordinance concerning the Mello Act and the use of feasibility studies, the current project is City of Los Angeles code compliant.

It is the hope of my client and the undersigned that the Commission follow existing law and Coastal policy and approve the cases before you and deny the subject appeals.

Thank you for your consideration of this submission.

Respectfully submitted,


Steve Kaplan

315 6th Ave, Venice
DIR-2019-2610-CDP-MEL; AA-2019-2609-PMLA-SL
West LA Area Planning Commission
May 5, 2021

You must approve the appeal and save affordable housing in the Venice Coastal Zone. While this appeal is primarily regarding an erroneous and egregious Mello Act Compliance Review, it also shows serious flaws in the City's CDP findings, particularly with respect to protection of visual resources and the character and scale of special communities, as covered in the certified LUP policies, guidance for determining conformance with Chapter 3. You must approve the to protect our special coastal community and to save affordable housing in the Venice Coastal Zone.

But it is also a blatant disregard for Environmental Justice Policy and contrary to the City's own position toward fair planning decisions (Email Newsletter)

The Environmental Policy must be enforced and here the Commissioners can apply their discretion towards granting the appeal.

The Mission of the Policy is to restore, manage and protect the states...historical and cultural resources ... using creative approaches and solutions..." This is where your discretion comes to play a positive role in the finding that the City has not applied MELLO correctly.

The California Resources Agency defines it as "the fair treatment of people of races, cultures and income with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." (Government Code Section 65040.12 and Public Resources Code Section 72000). And that all are to "enjoy equally high levels of environmental protection. Environmental justice communities are commonly identified as those where residents are predominantly minorities or low-income.

The four units at the site being discussed were occupied by elderly persons with low incomes. That they were white doesn't not preclude them from enjoying protections granted by the State Environmental Justice Policy. That they are no longer living in their respective units for a very long residency should not allow the Appellant to not ensure that these four affordable residential units should not be made available for subsequent eligible renters.

In these times when housing is taking front and center in our daily discussions, it is unthinkable that we are even considering granting this developer his applications to remove 4 affordable houses from Venice's existing housing stock to make way for a small lot subdivision erecting two units that will not guarantee providing affordable housing in Venice. And claiming that adding an ADU on each subdivided lot will also offer housing. ADUs add to housing density, they do not maintain is disingenuous at best.

Here is where you can use your discretion to make honest folk of Planning in standing by their words: "We pledge to intentionally and authentically deepen our efforts to serve all communities of Los Angeles in a manner that promotes equity and inclusivity." If not, shame on us. I urge you to grant this Appeal.

Respectfully,

Sue Kaplan
Venice resident



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

Doug Epperhart
President

Dean Pentcheff
Vice President

Kathleen Martin
Secretary

Louis Dominguez
Treasurer

1840 S Gaffey St., Box 34 • San Pedro, CA 90731 • (310) 918-8650
cspnclive@gmail.com

April 27, 2021

To:

cpc@lacity.org
planning.mello@lacity.org
christine.saponara@lacity.org
haydee.urita-lopez@lacity.org
councilmember.buscaino@lacity.org

Re: **City Mello Act ordinance must not allow demolitions/conversion
of 100% residential structures for purposes of mixed-use projects.**

The following resolution was passed at the April 2021 Coastal San Pedro Neighborhood Council Board meeting:

***Whereas*, the Mello Act law was enacted by the State Legislature in 1982 in order to set forth requirements concerning the demolition, conversion and construction of housing within California's Coastal Zone.**

***Whereas*, the Mello Act requires each Coastal Zone area to enforce three basic rules, including that existing residential structures shall be maintained as residential uses unless the local jurisdiction finds that residential uses are no longer feasible; the Act specifically states: "The conversion or demolition of any residential structure for purposes of a nonresidential use which is not 'coastal dependent...' shall not be authorized..."**

***Whereas*, a mixed-use building is a non-residential use and that is clear throughout the Los Angeles Municipal Code (LAMC) and all coastal regulations.**

***Whereas*, the City intends to exceed its jurisdiction by changing both the letter and the intent of the Mello Act law in order to allow conversion or demolition of 100% residential structures for the purpose of commercial mixed uses if the same number of units are maintained.**

***Whereas*, there are 29 100% residential structures in Neighborhood Commercial zones in the San Pedro Coastal Zone, which contain 231 units, 164 of them protected by the City's Rent Stabilization Ordinance. See attached listing.**

***Whereas*, changing 100% residential structures to mixed use projects would change the character of those buildings and the surrounding neighborhood to commercial in nature.**

Whereas, there is a housing shortage and not a mixed use or commercial use shortage.

Resolved, the Coastal San Pedro Neighborhood Council insists the City Planning Department and the City Planning Commission assure the proposed Mello Act Ordinance does not allow conversions or demolitions of 100% residential structures in the Los Angeles Coastal Zones, whether commercial or residential zoning, for purposes of mixed-use projects.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,

A handwritten signature in black ink, reading "Douglas Epperhart". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Doug Epperhart, President
On behalf of the Coastal San Pedro Neighborhood Council Board

ATTACHMENT INCLUDED

cc:

apcwestla@lacity.org
apcharbor@lacity.org
councilmember.bonin@lacity.org
jason.p.douglas@lacity.org
aksel.palacios@lacity.org
Alison.Becker@lacity.org
javier@studiogarchitecture.net
diananave@gmail.com
bill@power-la.org
venskus@lawsv.com
amy.poyer@cwlc.org
Sarah.Christie@coastal.ca.gov
Steve.Hudson@coastal.ca.gov

CPC February 25, 2021, Agenda Item 9. draft Mello Act Ordinance
 Noel Gould, Coastal San Pedro Neighborhood Council
 100% Residential Structures in Commercial Zones in the San Pedro Coastal Zone

ADDRESS	USE CODE	GPLU	CPIO -SUB AREA	RSO: #UNIT
3413 S PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3407 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3337 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3333 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3329 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
2733 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
2729 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
2316 PACIFIC AVE	0400 RESIDENTIAL 4 UNITS ANY COMBO 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 4
2300 PACIFIC AVE AND NORTH AND SOUTH ADJECENT PROPERTY	7500 INSTUTIONAL HOMES FOR AGED AND OTHERS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 32
2226 1-3 PACIFIC AVE	0300 RESIDENTIAL 3 UNITS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 3
2220 PACIFIC AVE	0400 RESIDENTIAL 4 UNITS ANY COMBO 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 4
2110 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 15
497 W 21ST STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 15
2040 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 21
1704 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	15
485 W 17TH STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	15
302 W 16TH STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE	1
312 W 16TH STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE	1

CPC February 25, 2021, Agenda Item 9. draft Mello Act Ordinance
 Noel Gould, Coastal San Pedro Neighborhood Council
 100% Residential Structures in Commercial Zones in the San Pedro Coastal Zone

316 W 16TH STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE		1
1529 CENTRE STREET	0300 RESIDENTIAL 3 UNITS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	2
1523 CENTRE STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE		1
287 W 15TH STREET	0200 RESIDENTIAL DOUBLE DUPLEX OR 2 UNIT 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	1
1312 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	COMMUNITY COMMERCIAL	COASTAL COMMERCIAL A	RSO	24
1226 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	CENTRAL COMMERCIAL B		30
124 W 11TH STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	MILTI FAMILY RESIDENTIAL	RSO	15
1012 S PALOS VERDES STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	12
125 W 10TH STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	16
134 W 10TH STREET	0200 RESIDENTIAL DOUBLE DUPLEX OR 2 UNIT 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	1
939-915 S BEACON ST	7500 INSTUTIONAL HOMES FOR AGED AND OTHERS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	0

231 UNITS TOTAL

164 RSO UNITS

The draft Mello Act Ordinance proposes to allow for conversions of residential structures to mixed use. Please do not allow the conversion of these 29 residential properties in San Pedro's Coastal Zone to mixed use. Not only is this not allowed by the Mello Act, but a change to mixed use would not conform with the Coastal Act, which requires the existing mix of uses to be maintained. It would lead to intensified commercial development in the area and chip away at the existing housing, which would change the character of the neighborhood.

DAY OF HEARING SUBMISSIONS



May 4, 2021

CPC-2019-7393-CA
ENV-2019-7394-ND

Re: Mello Act Ordinance must not allow demolitions/conversion of residential structures for purposes of mixed-use projects

Dear Los Angeles City Planning Commissioners:

The California Women's Law Center ("CWLC") is a non-profit law and policy center whose mission is to create a more just and equitable society by breaking down barriers and advancing the potential of women and girls through transformative litigation, policy advocacy and education. We focus on addressing economic justice, gender discrimination, violence against women, and women's health.

Venskus & Associates, APC is a boutique law firm litigating in the areas of housing rights and environmental/land use. The law firm represents and advocates for traditionally under-represented plaintiffs, such as low-income tenants, community organizations and environmental groups.

We write to urge the Los Angeles City Planning Commission ("Planning Commission") to ensure that its proposed Mello Act Ordinance (CPC-2019-7393-CA) does not:

- exceed the City's jurisdiction by conflicting with, or changing the meaning of, state law;
- run afoul of the Settlement Agreement Concerning Implementation of the Mello Act in the Coastal Zones within the City of Los Angeles ("Settlement Agreement");
- establish a law that is weaker than the City of Los Angeles' ("City") Mello Act Interim Administrative Procedures ("IAP").

The Settlement Agreement provided that the City must adopt Interim and Permanent Ordinances to implement both the Mello Act and the provisions of the Agreement. In response, the City adopted the IAP in 2000. In 2015, the City Council requested that City Planning prepare a permanent ordinance, but one was not adopted at that time. In April 2019, the City Council directed the Planning and Housing Departments to prepare and present a permanent ordinance to implement the Mello Act. In December 2019, the City's proposed Mello Act Ordinance was released. On February 25, 2021, the Planning Commission reviewed the proposed ordinance, but the vote was continued to May 13, 2021.

displacement. With the “mixed use” loophole, developers are encouraged to demolish the building and erect a new building in its place, thus displacing families currently living in older housing stock which is always, by definition, more affordable than new units deemed “affordable” pursuant to federal and state law. It makes no sense for the City to encourage destruction of existing housing, including affordable housing, so that more lucrative commercial mixed use projects can be built in the Coastal Zone, especially when such a concept runs completely contrary to the Mello Act’s intent. This would be a boon to developers and would cause a steady stream of property owners getting richer on the backs of our existing renters in the L.A. Coastal Zones as they will be displaced when mixed use projects replace residential structures.

VI. Conclusion

We understand that the City’s priority is to increase housing, but it must be done within the confines of the law and not by allowing conversions of residential structures to mixed use, in violation of the Mello Act.

We too support mixed use developments, but only where they replace existing commercial uses and thus add housing.

The Mello Act’s purpose is to protect all housing in the Coastal Zone, as well as to protect existing and provide for new affordable housing.

For the foregoing reasons, we respectfully urge you to eliminate any and all proposed Mello Act Ordinance language that would allow for demolition or conversion of residential structures for purposes of non-residential/commercial mixed use projects, in order to comply with state law and the Settlement Agreement and to ensure the City is acting within its jurisdiction.

Sincerely,

Amy Poyer
Senior Staff Attorney

California Women’s Law Center
360 N. Pacific Coast Hwy, Suite 2070
El Segundo, CA 90245
amy.poyer@cwlc.org

Sabrina Venskus
Partner

Venskus & Associates, A.P.C.
1055 Wilshire Blvd., Suite 1996
Los Angeles, CA 90017
venskus@lawsv.com



Planning APC West LA <apcwestla@lacity.org>

1639 & 1641 Abbott Kinney Project

1 message

Carol Levy <carol@veniceheritagemuseum.org>

Wed, May 5, 2021 at 3:48 PM

To: Ira.Brown@lacity.org, apcwestla@lacity.org

Cc: Ed Millan <ed@studioea.com>

To Whom It May Concern:

I am writing to you to voice my support for the project at 1639 and 1641 Abbott Kinney.

I have been a resident and homeowner in Venice for 9 years. In fact, my home was designed by David Hertz, as well. Because of my relationship with David and his whole team, I know from experience that they always look for the best ways to preserve the unique quality and character of Venice, while creating something both beautiful and thoughtful to the wants and needs of the neighborhood/neighbors. In this particular case, I love that they have creatively found a way to preserve the Venice bungalow while still providing the necessary parking.

I moved to Venice after living in Malibu for 30 years where I felt that developers ruined the "essence" of Malibu. I have complete trust in this group not to do that and instead to build a space that will honor and reflect the "essence" of Venice and will be a great asset to the community.

Thank you for your time,

Carol

Carol Levy/Board Member

Venice Heritage Foundation

310-614-1873

<https://www.veniceheritagemuseum.org/>



5 May 2021

Dear Commissioners,

This letter provides substantial evidence regarding this project. I want to first acknowledge the depth and completeness of the applicant's letter of application. But I still urge you to not grant this application because of the historic component and its conclusions. Adverse significant impact means just that, the application's mitigation does not protect the properties from losing a significant resource as part of the Abbot Kinney Historical District. (certified Venice Coastal Land Use Plan, Policy 1.F.2). SurveyLA includes it as "for conveying a strong visual sense of the overall historic environment of Abbot Kinney Boulevard during the period of pre-consolidation Venice." (SurveyLA, INDIVIDUAL RESOURCES, P. 23)

The HRA report has identified the back house (facing Electric Avenue – part of the residential neighborhood Oakwood) as eligible for listing in the NRHP (National), the CRHR (California) and for a designation as a HCM by the City of Los Angeles. As far as I can tell no action has been taken to apply for any of these designations.

The HRA prepared by SWCA Environmental Consultants has determined that "Research to date revealed no evidence that the rear building ever functioned as a ticket booth and therefore is not eligible as such." (HRA I and elsewhere). However, on further research, I found that it was a ticket booth. It was moved sometime before 1918 (the date for the first identified building permit) from Venice Boulevard across from City Hall (Tokio Palace opened in 1907 (now Beyond Baroque). An entry in a railroad interest blog:

*"Date: 01/30/18 21:39 Venice CA Train Station.
Went to check on the Venice City Hall (Tokio) train station today (ex Pacific Electric, nee Los Angeles Pacific). It was moved sometime ago from its original location on the Venice Short Line across from Venice City Hall (now Beyond Baroque) to a location along the original Santa Fe line into Santa Monica, at the corner of today's Venice and Electric. The station has been modified and is now a hair salon. I honestly wonder if the occupants have any idea they are in an old train station. Image one is the alley view. I'm standing on the Santa Fe ROW here. The Venice Short Line ROW this station belongs to is a building length south of here, but its original location was a bit east, across from the Venice City Hall." (Trainorders.com. Western Railroad Discussion > Venice CA Train Station)*

The applicant hopes to mitigate the adverse impact by raising it to a second story to provide parking underneath. This move will impact its ability to be eligible for inclusions in the different registries and for an HCM as this change will compromise meeting the requirements of Integrity: Evaluation of integrity is founded on "an understanding of a property's physical features and how they relate to its significance." (https://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm) The Integrity conditions most imperiled are Location, Setting, Feeling. This Historic Resource Assessment admits that the raising of the building "will have a negative effect on the special relationships." (HRA, p. 50)

The station as picture below follows the same shape and has many of the same features, notable the Japanese-style gables and uses similar clapboard siding (probably redone when it was moved, the opened

sides were closed to adapt to a residence.) Without the earlier permits, we can only propose until more information and documentation come to light. Criterion 4 of the requirements for listing in the National Registry allows “• Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.” More research into its history, its building history (early building permits may still be extant) and the significance of the early owners in the history of Venice. It may well be an example of early adaptive reuse.

It also meets the other criteria: • Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.

- Criterion 2: It is associated with the lives of persons important in our past. (it can be considered that the Short Line railway can be an important “personage”)

- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.”

Raising it up to a second story loses its relationship to the Electric Avenue residential neighborhood – Oakwood – and the integrity as significant to its setting and place. Raising it adversely affects its setting as integrated into the neighborhood and makes it lose its historic importance as a character defining resource – its appearance would belie its original use of a residential structure, its reminder of its original use and its importance as “a significant contribution to the broad patterns of California’s history and cultural heritage.”

Please do not violate the Coastal Act’s requirement to protect special communities. As you know, Venice was designated as a “special coastal community” based on its cultural, historical and architectural heritage... As such, its historical and cultural character must be protected.

Please do not allow the adverse impact on this significant structure until more information can be researched. Let’s not make the same mistake of 925-927 Marco Place. We cannot afford to lose anymore historic resources to bad decisions.

Sincerely,

Sue Kaplan

Venice resident and independent historian of Venice



May 4, 2021

I was a tenant at 3156th Ave. in Venice and I lived there at that property for 13 years. The complex changed hands once before the current owners bought the place.

Shortly after purchasing the property the new owners served all the tenants who lived there a no fault eviction notice under the Ellis Act. We were ultimately given a year to leave our units. Sometime before that date though, the owners put up a sign from a local Realty Co. indicating that the building was up for sale. One of my neighbors and I decided to get an attorney and fight this eviction because we knew that action was not allowed under the Ellis Act.

This is not the first time that I've lost a rent controlled unit that I could afford. I lived at 332 Rennie Ave. in Venice for 19 years before I got Ellis'd out of that residence. That's when I moved to the 3156th Ave. property just one street over.

I had lived in Venice for 32 years and was hoping to spend the rest of my life there. Now I find myself in a position of having to move out of the area completely, as I can no longer afford the available housing.

Please support the appeal in this case and put a stop to allowing Developers to buy rent controlled properties only to tear them down and replace them with Multiple level townhomes for the rich to buy.

Sincerely,
Lianne Chase



James Williams <james.k.williams@lacity.org>

no notice for this Wed WLAAPC hearing on 315 6th Ave1 message

Robin Rudisill <wildrudi@mac.com>

Tue, May 4, 2021 at 10:11 AM

To: Planning APCWestLA <apcwestla@lacity.org>, James Williams <james.k.williams@lacity.org>

Cc: Bill Przylucki <bill@power-la.org>, Jason Douglas <jason.p.douglas@lacity.org>, Sue Kaplan <sueakaplan@gmail.com>, Amanda Seward <amandaseward@artvista.net>

James and Commissioners,

Notice of this hearing has not been provided to the residents of this property and at least some (probably all) of those within 100 feet.

I found out that none of the residents/occupants at the property received notice when I contacted one of them yesterday. I asked them to check if the neighbors within 100 feet received any notice and I just found out 10 minutes ago that at least one residence definitely did not.

We respectfully request that the appeal hearing for 315 6th Avenue be continued until proper notice can be given.

Please let me know as soon as possible. Thank you so much James.

***For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343***



James Williams <james.k.williams@lacity.org>

NO NOTICE for TODAY's WLAAPC hearing on 315 6th Ave

Robin Rudisill <wildrudi@mac.com>

Wed, May 5, 2021 at 9:55 AM

To: James Williams <james.k.williams@lacity.org>

Cc: Planning APC West LA <apcwestla@lacity.org>, Bill Przylucki <bill@power-la.org>, Jason Douglas <jason.p.douglas@lacity.org>, Sue Kaplan <sueakaplan@gmail.com>, Amanda Seward <amandaseward@artvista.net>, Juliet Oh <Juliet.Oh@lacity.org>, Sienna Kuo <sienna.kuo@lacity.org>, Oscar Medellin <oscar.medellin@lacity.org>, Steve Kaplan <sk.landuselaw@gmail.com>, Irene Gonzalez <irene.gonzalez@lacity.org>, faisal.roble@lacity.org, Emily Alpert-Reyes <Emily.Alpert@latimes.com>, Rosanna Xia <rosanna.xia@latimes.com>, steve.lopez@latimes.com, Kevin Keller <kevin.keller@lacity.org>, Sabrina Venskus <venskus@lawsv.com>, Amy Poyer <amy.poyer@cwlc.org>, Judy Goldman <jrgposte@aol.com>, Brian Averill <briancaverill@gmail.com>, Steve Hudson <Steve.Hudson@coastal.ca.gov>, Kevin Denman <kdenman@icloud.com>, Laddie Williams <cwilli7269@gmail.com>, Arya Rahimian <rahimian@outlook.com>, Connie Brooks <connie_brooks@verizon.net>, Cari Bjelajac <bjelacari@gmail.com>, RESPCT <respctoday@gmail.com>, Naomi Nightingale <nightingalenaomi@yahoo.com>, "Ainsworth, John@Coastal" <john.ainsworth@coastal.ca.gov>, Erica Moore <bbccatering@earthlink.net>, Alix Gucovsky <beachbubbles94@gmail.com>, Alex Neiman <alexspence9@gmail.com>, Jim Robb <jimrobb1964@gmail.com>, DOC Chambers@cacd.uscourts.gov, Controller Galperin <controller.galperin@lacity.org>, Kelly_Davis@cacd.uscourts.gov, carolsobellaw@gmail.com, "Selvaraj, Sumi@Coastal" <sumi.selvaraj@coastal.ca.gov>, David Ewing <moreseriousbus@gmail.com>, David Ewing <seriousbus@aol.com>, Alley Bean <a@orsonbean.com>, Alley Bean <o@orsonbean.com>, Mary JACK <maryjackis@yahoo.com>, Richard Stanger <stangerr@ca.rr.com>, "Deidre Samuels >" <djsamuels@ca.rr.com>, Gabriel Ruspini <gruspini@gabrielruspinidesign.com>, mike.n.feuer@lacity.org, councilmember.buscaino@lacity.org, councilmember.bonin@lacity.org, Aksel Palacios <aksel.palacios@lacity.org>, Christine Saponara <christine.saponara@lacity.org>

URGENT—SEEKING JUSTICE IN THE VENICE COASTAL ZONE IN THE CITY OF L.A.

Please confirm that this email will be sent immediately to the West L.A. Area Planning Commission Commissioners.

Commissioners,

Please direct City Planning to **stop OPPRESSING the City's lower income residents and those of us who are trying to help them** and **start protecting and preserving affordable housing that is protected by law.**

I was just told that our concern about errors in noticing and my request for planning's evidence of noticing is "commission business" and will be addressed at the public hearing later today. That is nonsense! This is a procedural issue and needs to be resolved now.

Please direct Planning to immediately email me a copy of the noticing documents showing the evidence of site posting and the evidence of the mailing of the notices.

The residents of the property did not receive notice. At least one resident within 100 feet of the property did not receive notice.

Appellants and tenants should not have to find someone who can go door to door to see whether the other neighbors received notice or not.

The Planners, who were copied on my request, should respond to us Appellants with this information. I see no reason why Planning can't see fit to coordinate with each other to provide us this information instead of just brushing us off.

Appellants should not have to organize the concerned public and spend hours preparing for a hearing that is not properly noticed, just in case the Commissioners don't see fit to continue the hearing in spite of the noticing errors.

This entire planning case is yet ANOTHER EXAMPLE of structural racism in the City Planning Department. It just never stops. It never changes. The UNDERDOG, the tenants, who are consistently oppressed at every point in the process, are yet again the losers here. EVERY decision is made against them, from small to large. **Planning is doing nothing to try to help with the affordable housing crisis but only making it worse by the day.**

We in the community are trying our level best to help stem the extreme outflow of affordable housing that Planning has facilitated. But in spite of everything we do, we keep getting decisions that support Planning's egregious actions resulting in the constant loss of affordable housing.

Your Planning department is not protecting the coast and it is not protecting affordable housing. In fact, they work very hard, as evidenced once again by their staff report recommendation to you, to do the opposite.

https://planning.lacity.org/odocument/d8b66fa3-c6e0-4b2c-a3f7-73aa614b302d/AA-2019-2609_&_DIR-2019-2610.pdf

This case is yet another example of how your Planners interpret our wonderful laws--that DO protect affordable housing and our lower income population--in a way that only benefits developers.

This is a very clear pattern and practice by the City of L.A. to allow the loss of MILLIONS and MILLIONS of dollars of affordable housing, in this case in the Venice Coastal Zone, which is doubly protected by law.

When does it stop? Who is going to stop it?

Commissioners, **it's your job to stop this**. PLEASE do not be complicit with this theft of affordable housing. Please don't force us to take this to the Courts.

PLEASE SEE THE CLEAR CONNECTION BETWEEN DECISIONS LIKE THIS AND THE AFFORDABLE HOUSING CRISIS AND THE HOMELESSNESS CRISIS!!!

And on top of the violations of the Mello Act, Planning is violating the Coastal Act by refusing to acknowledge the protections in the Coastal Act and the certified LUP re. protecting Venice as a special coastal community and refusing to acknowledge the requirement for a cumulative impacts analysis, something that both the Coastal Commission and the Courts have made clear. **It's UNACCEPTABLE. Planning is out to homogenize the Venice Coastal Zone and give the coast away to the wealthy while banishing the poor.**

City Planning's work is incongruent with the purpose of those laws and is opposite of the City's stated policies to protect affordable housing!

And on top of all this, City Planning refuses to acknowledge the Environmental Justice provisions of the Coastal Act, state law. They only say they will work with the Coastal Commission to incorporate the EJ policy in the eventual LCP, which is still far down the line. That is unacceptable and must not be tolerated by the Planning Director, Vince Bertoni or the City's Racial Equity Officer, Faisal Roble, OR the Coastal Commission. IT'S ABSOLUTELY SHOCKING THAT THE CITY IS BEHAVING LIKE THIS.

WHEN WILL THERE EVER BE JUSTICE?!

Lastly, attached is a statement from one of the tenants being impacted by this rotten planning decision that we are trying to challenge. She wants to help on this appeal but is too traumatized to speak at the hearing. I don't blame her. She has been through TWO identical situations causing her to lose her affordable home twice, and she has now been forced to leave town. **The City is allowing developers to make millions of dollars on the backs of these lower income tenants.**

Here is her written statement. I emailed this to your office yesterday and asked for confirmation of receipt but never received a reply. **Please confirm receipt.**

*For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343*



James Williams <james.k.williams@lacity.org>

SAME DAY SUBMISSION--1639 Abbot Kinney

2 messages

Robin Rudisill <wildrudi@mac.com>

Wed, May 5, 2021 at 6:09 PM

To: Planning APC West LA <apcwestla@lacity.org>, James Williams <james.k.williams@lacity.org>

Commissioners,

HCID is violating Mello again by basing affordable unit determination on commercial rent.

We've got to call them on that and stop this illegal practice.

Juliet is the Mello Act Coordinator and she CAN decide not to accept that and not approve the Mello Act Compliance Determination. The HCID letter is corrupted, it's illegal. She cannot rely on it.

City Planning CAN not and MUST not not base their Mello decision on it!!

Per Bill Przylucki just now:

The law says "monthly housing cost" which pretty clearly excludes commercial rent, not to mention the fact that basing it on commercial rent when Mello prohibits converting residential to commercial is rewarding previous illegal activity.

It's time to assure the law is followed!

PLEASE TAKE ACTION TO PROTECT AFFORDABLE HOUSING!

*For the Love of Los Angeles
and our precious Coast,*
Robin Rudisill
(310) 721-2343

James Williams <james.k.williams@lacity.org>

Wed, May 5, 2021 at 6:13 PM

To: Robin Rudisill <wildrudi@mac.com>

Cc: Oscar Medellin <oscar.medellin@lacity.org>, Irene Gonzalez <irene.gonzalez@lacity.org>

Bcc: Jason Douglas <jason.p.douglas@lacity.org>

Thank you for your submission. It has been shared with the Commission.



LOS ANGELES
CITY PLANNING

James K. Williams
Commission Executive Assistant II
Cultural Heritage Commission
West LA Area Planning Commission

james.k.williams@lacity.org
T: (213) 978-1295

Los Angeles City Planning
200 N. Spring St., Room 272
Los Angeles, CA 90012