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Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

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If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

March 1, 2024

TO: West Los Angeles Area Planning Commission

FROM: Ira Brown, City Planner

ADDITIONAL INFORMATION FOR CASE NO. ZA-2021-7223-CUB-CU-CDP-1A; 1217 South Ocean Front Walk

Transmitted herewith are documents submitted in support of appeal of Keep Neighborhoods First by Law Offices of John P. Given to be considered at the Area Planning Commission meeting of March 6, 2024 related to Item No. 5 on the meeting agenda.

LAW OFFICE OF JOHN P. GIVEN

2309 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

February 26, 2024

Submitted by email only to apcwestla@lacity.org

West LA Area Planning Commission
Falicia Mahood Multipurpose Center
11338 Santa Monica Boulevard
Los Angeles, CA 90025

RE: ZA-2021-7223-CUB-CU-CDP-1A (1217 S. Ocean Front Walk)
Document Submission in Support of Appeal of Keep Neighborhoods First

Honorable Commission Members:

Attached to this letter are the following exhibits, relevant to the above-captioned appeal:

Exhibit 1: Original Submittal Documents for Planning Case 2020-1541-CUB-CU-CDP as provided online by the Department of City Planning,¹ including:

Application
Findings
Project Plans, and
Radius Map)

Exhibit 2: April 29, 2021 Letter from Law Office of John P. Given to Director of Planning Vince Bertoni, including attachments:

March 20, 2020 Letter from Law Office of John P. Given to Director of Planning Vince Bertoni, with exhibits (A) Nov. 3, 2017 letter from California Coastal Commission to Venice Suites LLC; (B) Certificates of Occupancy for 1217 Ocean Front Walk; and (C) Venice V Hotel website page noting V Hotel "Opening June, 2021."

Sincerely,



John Given

Encl.

¹ The documents remain available at the following web page under the "Initial Submittal Documents" tab, at: <https://planning.lacity.gov/pdiscaseinfo/search/encoded/MjM2MzMz0>.

EXHIBIT 1



APPLICATIONS:

DEPARTMENT OF CITY PLANNING APPLICATION

THIS BOX FOR CITY PLANNING STAFF USE ONLY

Case Number _____

Env. Case Number _____

Application Type _____

Case Filed With (Print Name) _____ Date Filed _____

Application includes letter requesting:

☐ Waived hearing ☐ Concurrent hearing ☐ Hearing not be scheduled on a specific date (e.g. vacation hold)

Related Case Number _____

Provide all information requested. Missing, incomplete or inconsistent information will cause delays.

All terms in this document are applicable to the singular as well as the plural forms of such terms.

Detailed filing instructions are found on form CP-7810

1. PROJECT LOCATION

Street Address¹ 1217 S. Ocean Front Walk Unit/Space Number _____Legal Description² (Lot, Block, Tract) Lots 3-5, Block 4, Country Club TractAssessor Parcel Number 4226005004 Total Lot Area 4,414.6

2. PROJECT DESCRIPTION

Present Use Apartment Hotel, Restaurant & TheaterProposed Use Apartment Hotel, Restaurant & TheaterProject Name (if applicable) The V HotelDescribe in detail the characteristics, scope and/or operation of the proposed project A conditional use permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption, in conjunction with anexisting 26,241 sq. ft. hotel, including 36 rooms with 36 in-room minibars, a 645 sq. ft. bar with 17 seats located onAdditional information attached ☐ YES ☒ NO

Complete and check all that apply:

Existing Site Conditions

- ☐ Site is undeveloped or unimproved (i.e. vacant)
- ☒ Site has existing buildings (provide copies of building permits)
- ☐ Site is/was developed with use that could release hazardous materials on soil and/or groundwater (e.g. dry cleaning, gas station, auto repair, industrial)

the ground floor, a 1,276 sq. ft. restaurant having 43 interior seats located on the ground floor, and an existing 748 sq. ft. basement theater with 49 seats and a 200 sq. ft. penthouse patio with 13 outdoor seats, with 24-hour operation daily with alcohol sales within the hours of 8:00 am to 2:00 am

- ☐ Site is located within 500 feet of a freeway or railroad
- ☐ Site is located within 500 feet of a sensitive use (e.g. school, park)
- ☐ Site has special designation (e.g. National Historic Register, Survey LA)

¹ Street Addresses must include all addresses on the subject/application site (as identified in ZIMAS—<http://zimas.lacity.org>)² Legal Description must include all contiguously owned properties (even if they are not a part of the proposed project site)

Proposed Project Information

(Check all that apply or could apply)

- ☐ Demolition of existing buildings/structures
- ☐ Relocation of existing buildings/structures
- ☐ Interior tenant improvement
- ☐ Additions to existing buildings
- ☐ Grading
- ☐ Removal of any on-site tree
- ☐ Removal of any street tree

- ☐ Removal of protected trees on site or in the public right of way
- ☐ New construction: _____ square feet
- ☐ Accessory use (fence, sign, wireless, carport, etc.)
- ☐ Exterior renovation or alteration
- ☐ Change of use and/or hours of operation
- ☐ Haul Route
- ☐ Uses or structures in public right-of-way
- ☐ Phased project

Housing Component Information

Number of Residential Units: Existing _____ - Demolish(ed)³ _____ + Adding _____ = Total _____

Number of Affordable Units⁴ Existing 0 - Demolish(ed) 0 + Adding 0 = Total 0

Number of Market Rate Units Existing 36 - Demolish(ed) 0 + Adding 0 = Total 36

Mixed Use Projects, Amount of Non-Residential Floor Area: 6099 square feet

Public Right-of-Way InformationHave you submitted the Planning Case Referral Form to BOE? (required) ☐ YES ☒ NOIs your project required to dedicate land to the public right-of-way? ☐ YES ☒ NOIf so, what is/are your dedication requirement(s)? N/A ft.If you have dedication requirements on multiple streets, please indicate: N/A**3. ACTION(S) REQUESTED**

Provide the Los Angeles Municipal Code (LAMC) Section that authorizes the request and (if applicable) the LAMC Section or the Specific Plan/Overlay Section from which relief is sought; follow with a description of the requested action.

Does the project include Multiple Approval Requests per LAMC 12.36? ☐ YES ☒ NOAuthorizing Code Section 12-24-W, 1

Code Section from which relief is requested (If any): _____

Action Requested, Narrative: A conditional use permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption, in conjunction with an existing 26,241 sq. ft. hotel, including 36 rooms with 36In-room minibars, a 645 sq. ft. bar with 17 seats located on the ground floor, a 1,276 sq. ft. restaurant having 43 interior seats located on the ground floor, and an existing 748 sq. ft. basement theater with 49 seats and a 200 sq. ft. penthouse patio with 13 outdoor seats, with 24-hour operation daily with alcohol sales within the hours of 8:00 am to 2:00 am

Authorizing Code Section _____

Code Section from which relief is requested (If any): _____

Action Requested, Narrative: _____

Additional Requests Attached ☐ YES ☒ NO³ Number of units to be demolished and/or which have been demolished within the last five (5) years.⁴ As determined by the Housing and Community Investment Department

4. RELATED DEPARTMENT OF CITY PLANNING CASES

Are there previous or pending cases/decisions/environmental clearances on the project site? ☐ YES ☒ NO

If YES, list all case number(s) _____

If the application/project is directly related to one of the above cases, list the pertinent case numbers below and complete/check all that apply (provide copy).

Case No. _____

Ordinance No.: _____

☐ Condition compliance review

☐ Clarification of Q (Qualified) classification

☐ Modification of conditions

☐ Clarification of D (Development Limitations) classification

☐ Revision of approved plans

☐ Amendment to T (Tentative) classification

☐ Renewal of entitlement

☐ Plan Approval subsequent to Master Conditional Use

For purposes of environmental (CEQA) analysis, is there intent to develop a larger project? ☐ YES ☐ NO

Have you filed, or is there intent to file, a Subdivision with this project? ☐ YES ☐ NO

If YES, to either of the above, describe the other parts of the projects or the larger project below, whether or not currently filed with the City:

5. RELATED DOCUMENTS / REFERRALS

To help assigned staff coordinate with other Departments that may have a role in the proposed project, please provide a copy of any applicable form and reference number if known.

a. Specialized Requirement Form _____

b. Geographic Project Planning Referral _____

c. Citywide Design Guidelines Compliance Review Form _____

d. Affordable Housing Referral Form _____

e. Mello Form _____

f. Unpermitted Dwelling Unit (UDU) Inter-Agency Referral Form _____

g. HPOZ Authorization Form _____

h. Management Team Authorization _____

i. Expedite Fee Agreement _____

j. Department of Transportation (DOT) Referral Form _____

k. Preliminary Zoning Assessment Referral Form _____

l. SB330 Preliminary Application _____

m. Bureau of Engineering (BOE) Planning Case Referral Form (PCRF) _____

n. Order to Comply _____

o. Building Permits and Certificates of Occupancy _____

p. Hillside Referral Form (BOE) _____

q. Low Impact Development (LID) Referral Form (Storm water Mitigation) _____

r. SB330 Determination Letter from Housing and Community Investment Department _____

s. Are there any recorded Covenants, affidavits or easements on this property? ☐ YES (provide copy) ☐ NO

PROJECT TEAM INFORMATION (Complete all applicable fields)

Applicant⁵ name Venice Waldorf, LLC

Company/Firm Venice Waldorf, LLC

Address: 2 Breeze Avenue Unit/Space Number 101

City Los Angeles State CA Zip Code: 90291

Telephone (310) 453-9656 E-mail: carl@lambertinc.com

Are you in escrow to purchase the subject property? ☐ YES ☒ NO

Property Owner of Record ☒ Same as applicant ☐ Different from applicant

Name (if different from applicant) _____

Address _____ Unit/Space Number _____

City _____ State _____ Zip Code: _____

Telephone _____ E-mail: _____

Agent/Representative name Elizabeth Peterson

Company/Firm Elizabeth Peterson Group Inc.

Address: 400 S. Main Street Unit/Space Number 808

City Los Angeles State CA Zip: 90013

Telephone (213) 620-1904 E-mail: mark@epgla.com

Other (Specify Architect, Engineer, CEQA Consultant etc.) _____

Name _____

Company/Firm _____

Address: _____ Unit/Space Number _____

City _____ State _____ Zip Code: _____

Telephone _____ E-mail: _____

Primary Contact for Project Information
(select only one)

☐ Owner

☐ Applicant

☒ Agent/Representative

☐ Other

To ensure notification of any public hearing as well as decisions on the project, make sure to include an individual mailing label for each member of the project team in both the Property Owners List, and the Abutting Property Owners List.

⁵ An applicant is a person with a lasting interest in the completed project such as the property owner or a lessee/user of a project. An applicant is not someone filing the case on behalf of a client (i.e. usually not the agent/representative).

PROPERTY OWNER

7. **PROPERTY OWNER AFFIDAVIT.** Before the application can be accepted, the owner of each property involved must provide a notarized signature to verify the application is being filed with their knowledge. Staff will confirm ownership based on the records of the City Engineer or County Assessor. In the case of partnerships, corporations, LLCs or trusts the agent for service of process or an officer of the ownership entity so authorized may sign as stipulated below.

- **Ownership Disclosure.** If the property is owned by a partnership, corporation, LLC or trust, a disclosure identifying the agent for service of process or an officer of the ownership entity must be submitted. The disclosure must list the names and addresses of the principal owners (25% interest or greater). The signatory must appear in this list of names. A letter of authorization, as described below, may be submitted provided the signatory of the letter is included in the Ownership Disclosure. Include a copy of the current partnership agreement, corporate articles, or trust document as applicable.
- **Letter of Authorization (LOA).** A LOA from a property owner granting someone else permission to sign the application form may be provided if the property is owned by a partnership, corporation, LLC or trust or in rare circumstances when an individual property owner is unable to sign the application form. To be considered for acceptance, the LOA must indicate the name of the person being authorized the file, their relationship to the owner or project, the site address, a general description of the type of application being filed and must also include the language in items A-D below. In the case of partnerships, corporations, LLCs or trusts the LOA must be signed and notarized by the authorized signatory as shown on the Ownership Disclosure or in the case of private ownership by the property owner. Proof of Ownership for the signatory of the LOA must be submitted with said letter.
- **Grant Deed.** Provide a Copy of the Grant Deed If the ownership of the property does not match City Records and/or if the application is for a Coastal Development Permit. The Deed must correspond exactly with the ownership listed on the application.
- **Multiple Owners.** If the property is owned by more than one individual (e.g. John and Jane Doe or Mary Smith and Mark Jones) notarized signatures are required of all owners.

- a. I hereby certify that I am the owner of record of the herein previously described property located in the City of Los Angeles which is involved in this application or have been empowered to sign as the owner on behalf of a partnership, corporation, LLC or trust as evidenced by the documents attached hereto.
- b. I hereby consent to the filing of this application on my property for processing by the Department of City Planning.
- c. I understand if the application is approved, as a part of the process the City will apply conditions of approval which may be my responsibility to satisfy including, but not limited to, recording the decision and all conditions in the County Deed Records for the property.
- d. By my signature below, I declare under penalty of perjury under the laws of the State of California that the foregoing statements are true and correct.

*Property Owner's signatures must be signed/notarized in the presence of a Notary Public.
The City requires an original signature from the property owner with the "wet" notary stamp.
A Notary Acknowledgement is available for your convenience on following page.*

Signature Carl Lambert

Date 3/4/2020

Print Name CARL LAMBERT

Signature _____

Date _____

Print Name _____

Space Below For Notary's Use

California All-Purpose Acknowledgement

Civil Code ' 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

On March 4, 2020 before me, Natalie Bernstein, Notary Public
(Insert Name of Notary Public and Title)

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

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and
correct.

WITNESS my hand and official seal.

Natalie Bernstein
Signature

(Seal)



APPLICANT

8. **APPLICANT DECLARATION.** A separate signature from the applicant, whether they are the property owner or not, attesting to the following, is required before the application can be accepted.
- a. I hereby certify that the information provided in this application, including plans and other attachments, is accurate and correct to the best of my knowledge. Furthermore, should the stated information be found false or insufficient to fulfill the requirements of the Department of City Planning, I agree to revise the information as appropriate.
 - b. I hereby certify that I have fully informed the City of the nature of the project for purposes of the California Environmental Quality Act (CEQA) and have not submitted this application with the intention of segmenting a larger project in violation of CEQA. I understand that should the City determine that the project is part of a larger project for purposes of CEQA, the City may revoke any approvals and/or stay any subsequent entitlements or permits (including certificates of occupancy) until a full and complete CEQA analysis is reviewed and appropriate CEQA clearance is adopted or certified.
 - c. I understand that the environmental review associated with this application is preliminary, and that after further evaluation, additional reports, studies, applications and/or fees may be required.
 - d. I understand and agree that any report, study, map or other information submitted to the City in furtherance of this application will be treated by the City as public records which may be reviewed by any person and if requested, that a copy will be provided by the City to any person upon the payment of its direct costs of duplication.
 - e. I understand that the burden of proof to substantiate the request is the responsibility of the applicant. Additionally, I understand that planning staff are not permitted to assist the applicant or opponents of the project in preparing arguments for or against a request.
 - f. I understand that there is no guarantee, expressed or implied, that any permit or application will be granted. I understand that each matter must be carefully evaluated and that the resulting recommendation or decision may be contrary to a position taken or implied in any preliminary discussions.
 - g. I understand that if this application is denied, there is no refund of fees paid.
 - i. I understand and agree to defend, indemnify, and hold harmless, the City, its officers, agents, employees, and volunteers (collectively "City"), from any and all legal actions, claims, or proceedings (including administrative or alternative dispute resolution (collectively "actions"), arising out of any City process or approval prompted by this Action, either in whole or in part. Such actions include but are not limited to: actions to attack, set aside, void, or otherwise modify, an entitlement approval, environmental review, or subsequent permit decision; actions for personal or property damage; actions based on an allegation of an unlawful pattern and practice; inverse condemnation actions; and civil rights or an action based on the protected status of the petitioner or claimant under state or federal law (e.g. ADA or Unruh Act). I understand and agree to reimburse the City for any and all costs incurred in defense of such actions. This includes, but is not limited to, the payment of all court costs and attorneys' fees, all judgments or awards, damages, and settlement costs. The indemnity language in this paragraph is intended to be interpreted to the broadest extent permitted by law and shall be in addition to any other indemnification language agreed to by the applicant.
 - i. By my signature below, I declare under penalty of perjury, under the laws of the State of California, that all statements contained in this application and any accompanying documents are true and correct, with full knowledge that all statements made in this application are subject to investigation and that any false or dishonest answer to any question may be grounds for denial or subsequent revocation of license or permit.

The City requires an original signature from the applicant. The applicant's signature below does not need to be notarized.

Signature: 
Print Name: CARL LAMBERT

Date: 3/4/2020

OPTIONAL
NEIGHBORHOOD CONTACT SHEET

9. **SIGNATURES** of adjoining or neighboring property owners in support of the request are not required but are helpful, especially for projects in single-family residential areas. Signatures may be provided below (attach additional sheets if necessary).

NAME (PRINT)	SIGNATURE	ADDRESS	KEY # ON MAP

REVIEW of the project by the applicable Neighborhood Council is not required, but is helpful. If applicable, describe, below or separately, any contact you have had with the Neighborhood Council or other community groups, business associations and/or officials in the area surrounding the project site (attach additional sheets if necessary).

**Findings- Attachment 1
1217 S. Ocean Front Walk
Los Angeles, CA 90291**

Representative:

Elizabeth Peterson Group, Inc.

400 S. Main St., Suite 808

Los Angeles, CA 90013

T: 213-620-1904

F: 213-620-1587

mark@epgla.com

Applicant/Owner:

Venice Waldorf, LLC

2 Breeze Ave. #101

Los Angeles, CA 90291

T: 310-453-9656

carl@lambertinc.com

Request:

Pursuant to the Los Angeles Municipal Code, section 12.24-W,1; the applicant requests a new Conditional Use permit the on-site sale, dispensing, and consumption of a full-line of alcoholic beverages in conjunction with an existing 26,241 sq. ft. hotel, including 36 rooms with 36 in-room minibars, a 645 sq. ft. bar with 17 seats located on, a 1,276 sq. ft. restaurant having 43 interior seats located on the ground floor, an existing 748 sq. ft. basement theater with 49 seats and a 200 sq. ft. penthouse patio with 13 outdoor seats, with 24-hour operation daily with alcohol sales within the hours of 6:00 am to 2:00 am.

Project and Site Description:

The subject site is located on South Ocean Front Walk between Clubhouse Ave. and Westminster Ave. The site has an area of approximately 4,414.6 square feet, and is improved with a 5-story building with a basement. The building was built in 1913. The applicant requests to permit a full line of alcohol for on-site consumption in conjunction with 36 hotel rooms, a new ground floor restaurant, basement theater and 36 in-room alcohol access cabinets.

GENERAL CONDITIONAL USE FINDINGS:

- 1. That the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.**

The project site is located off of the Venice Beach Boardwalk, which features hundreds of street vendors and performers. The project would provide much needed hospitality amenities to this stretch of the boardwalk. In the way of a ground floor restaurant for dining needs and a basement theater. The surrounding community offers small cafes and food stands, but not many true dining establishments intended for people to sit down and enjoy a meal. The redevelopment of the existing hotel would allow the building to offer all-day and late-night dining, drawing in visitors and providing community members a safe and enjoyable space to dine. The requested entitlements to allow the sale and service of alcohol would benefit such establishments by allowing them to offer amenities that are not only desired by patrons but expected of quality restaurants and hotel spaces.

The restaurant's and bar's quality service and offerings, both in food and alcohol will be a benefit to residents who are currently residing near the Venice Boardwalk, and will also serve as an attraction and

amenity to future residents and tourists of the area. Having a walkable, 24-hour environment is a major attraction to living near the Venice Boardwalk, and the redevelopment and offerings intended at the subject site will contribute to this desired lifestyle. The amenities and fresh aesthetic of the proposed hotel will enliven the space and improve the vibrancy of the area. Additionally, the renewed activity at the subject site will serve to create a positive pedestrian experience by having eyes on the street throughout the day and nighttime.

2. That the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The project's size, height, and operation will be compatible with the surrounding neighborhood. The building was built in 1913 as a multi-family residential home and is currently being used as a hotel. In order to remain viable in Venice's rapidly changing economy, the continuation of using this building as a hotel will impart the building with renewed vitality.

Rather than degrade adjacent properties and the surrounding neighborhood, the continued use of the subject site will actually improve the safety, welfare and aesthetic of the neighborhood. The hotel and its offered amenities of restaurants and alcohol service will renew life into the building, restoring activity of this area during day and nighttime periods. Additionally, the requested entitlements will provide services for the hotel, making it more economically prosper, but also more appealing and pleasing to visitors and community members who are welcome to enjoy its amenities. The subject site is compatible with both current uses and proposed uses as this area continues to change and evolve into a more 24-hour, livable part of the City.

3. That the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The proposed project conforms to the purpose and intent of the General Plan. The subject site is located in a C1-1 zone, and is designated as Community Commercial. As a hotel, the site will create many more jobs for residents including management staff, hotel service staff, restaurant staff, and security. It will also be a space for entertainment as the basement will include a theater, it will be a space that is intended to support guests to the area, encouraging increased trips around Venice and patronage to other local establishments and tourist sites.

The subject site is located within both the Los Angeles Coastal Transportation Corridor and the Venice Coastal Zone, designated as North Venice. The Los Angeles Coastal Transportation Corridor acts to regulate the transportation impacts that occur during new commercial and industrial development. As the site is currently a hotel, there will be no new commercial or industrial development being done. Therefore the project conforms to the Los Angeles Coastal Transportation Corridor Specific Plan. As well, the project is in compliance with the Venice Coastal Zone Specific Plan, as the commercially zoned lot shall not exceed the density permitted in the R3 Zone.

In addition to addressing the specific plans, this development project purposefully fills goals set forth by the community plan:

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.

Objective 2-2: To enhance the identity of distinctive commercial districts and to identify pedestrian-oriented districts.

Objective 2-3: To enhance the appearance of commercial districts.

ADDITIONAL FINDINGS:

a. Explain how the proposed use will not adversely affect the welfare of the pertinent community.

Approval of the conditional use will not adversely affect the welfare of the community. The project will provide the local economy with jobs and provide the City of Venice with much-needed taxable revenue. Additionally, the project will bring tourists and more residents to the area, increasing safety through numbers and eyes on the street, but also infusing life and vibrancy to the area. The amenities offered by the hotel, including the requested sales and dispensing of alcohol, will be open to both hotel guests and community members, providing much needed dining options for this part of Venice. The continued use of the building will also bring more economic benefits, for both the residents through increases property values and for the City.

b. Explain how the approval of the application will not result in or contribute to an undue concentration of such establishments.

The approval of the requested entitlements will only further improve this area of Venice by offering a variety of entertainment spaces to enjoy, attracting a diverse mix of visitors, tourists and residents. The proposed project will integrate well with the existing unique features of Venice and will serve the area with sought after amenities. The requested entitlement are necessary for the financial and conceptual success of the hotel, as guests and visiting patrons expect such amenities in fine establishments. Granting the requested entitlement will allow the other positive benefits of the hotel to be successful, including the improved security and physical presence.

c. Explain how the approval of the application will not detrimentally affect nearby residential zones or uses.

The requested entitlement will not detrimentally affect nearby residential zones or uses. Currently, the subject property is an existing hotel which is surrounded by both commercially zoned properties with commercial uses and low-residential properties. The subject property is designed to concentrate the restaurant and bar/dining establishments on the ground floor/ basement to match the mode and character of the surrounding buildings and uses. The intermediate floors will be reserved for the hotel guest rooms, which aligns with the residential components of the surrounding areas intended for sleeping and quieter enjoyment.

Additionally, the proposed use will provide positive amenities to the residents, making their neighborhood more walkable and safe, and providing enjoyable dining options within easy access of

their homes. To ensure pleasant enjoyment of their properties, the applicant is prepared to provide security to monitor use of the site, ensuring patron safety and community quiet enjoyment. The requested entitlements, if granted, will also be accompanied by conditions set forth from the Office of the Zoning Administrator on behalf of the residents.

THE V HOTEL & RESTAURANT

SCOPE

- (E) 36 ROOM HOTEL + SERVICE AREAS
- (E) 1,276 SF RESTAURANT
- (E) 748 SF BASEMENT THEATER

CALCULATIONS OF HOTEL FLOOR SERVICE AREA FOR ALCOHOL

LOCATION	SF	SEATING
BASEMENT	360 SF HOTEL FSA (PRE-FUNCTION)	49 SEATS (NON-FIXED)
1ST FLOOR	1,175 SF HOTEL FSA (BAR)	17 SEATS (FIXED)
2ND FLOOR	0 SF HOTEL FSA	
3RD FLOOR	0SF HOTEL FSA	
4TH FLOOR	0SF HOTEL FSA	
PENTHOUSE	200 SF HOTEL FSA (PATIO)	13 SEATS (NON-FIXED)
TOTAL	1,620 SF HOTEL FSA	

CALCULATIONS OF RESTAURANT SEATING

LOCATION	SF	SEATING
RESTAURANT	1276 SF	43 SEATS (FIXED)

PARKING

PARKING REQUIRED	=	0
PARKING PROVIDED	=	0

PROJECT CONTACTS

OWNER:
VENICE WALDORF
2 E. BREEZE AVE., SUITE 101
VENICE CA 90291
310.453.9656

ARCHITECT:
SCOTT SULLIVAN (C-33139)
RELATIVITY ARCHITECTS
6824 LEXINGTON AVE
LOS ANGELES, CA 90028
310.907.6845
scott@relativityarchitects.com

EXPEDITING
EPG
ELIZABETH PETERSON
400 S. Main Street #808,
LOS ANGELES, CA 90013
213.620.1904
mark@epgla.com | epgla.com

PROJECT INFO / LEGAL DESCRIPTION

ADDRESS:
1217 S OCEAN FRONT WALK
VENICE, CA 90291

ZONING:
C1-1

CONSTRUCTION TYPE:
III-B

STORIES:
5 STORIES

FLOOR AREA:
26,241 SF

OCCUPANCY GROUP:
A-1: BASEMENT WITH THEATER
A-2: 1ST FL. RESTAURANT
M" 1ST FL. RETAIL
R-1: 36 UNITS, (11 APTS, 22 HOUSEKEEPING
ROOMS, 3 GUEST ROOMS)

LOT AREA:
4,414 SF

FIRE SPRINKLERS:
YES (PER DOROTHY MAE ORDINANCE)

ASSESSOR PARCEL NO. (APN):
4226 - 005 - 004

LEGAL DESCRIPTION:
TR: COUNTRY CLUB TRACT. BLOCK 4, LOT #5

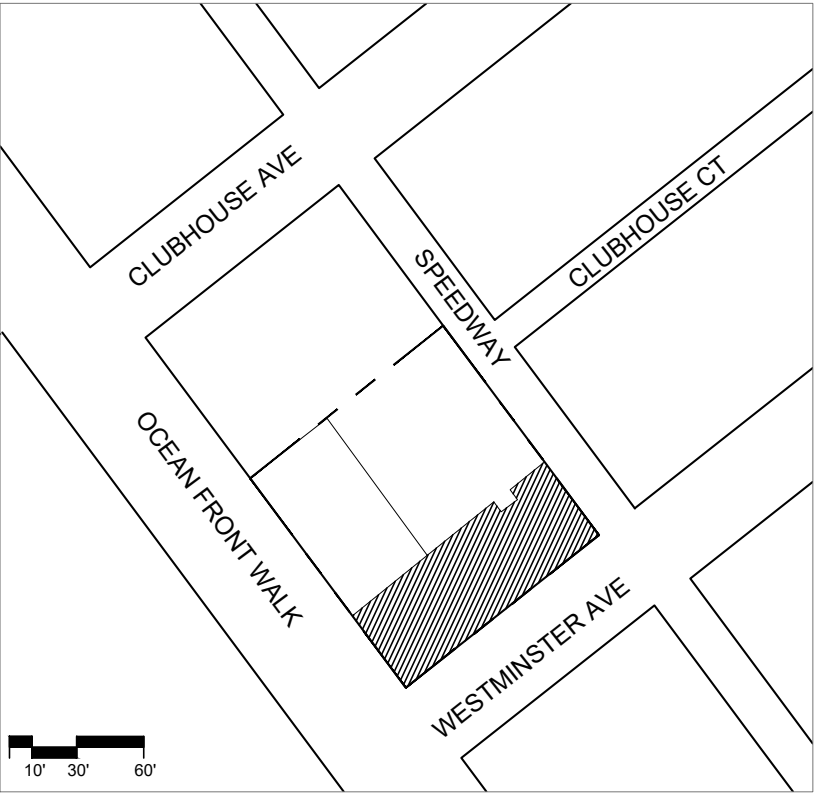
APPLICABLE CODES:
2013 CBC, CRC, CMC, CPC, CEC, CGBC, T24 CA
ENERGY, 2012 IBC,

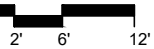
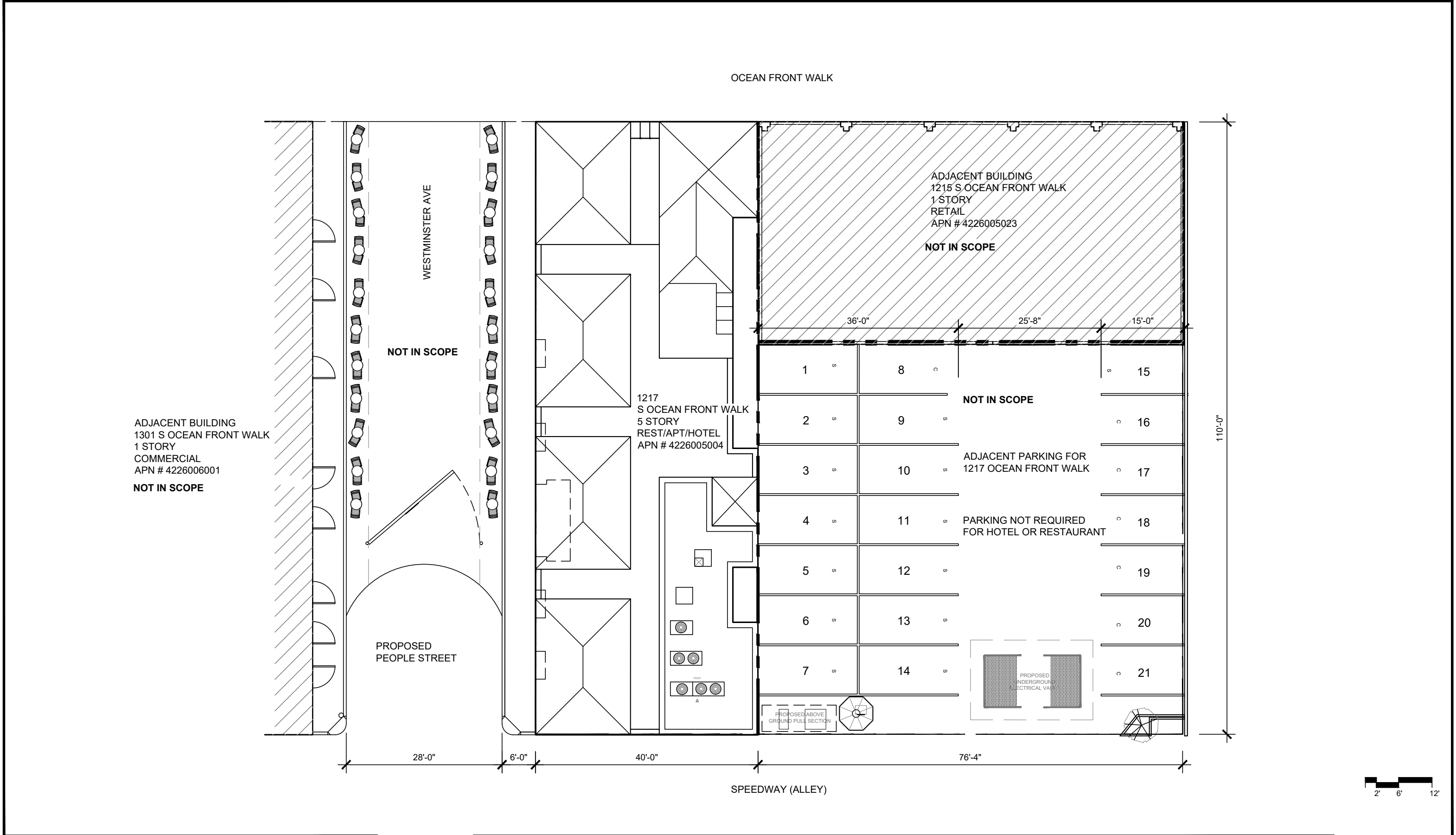
PARKING:
NO NEW SQUARE FEET ADDED.

*PROJECT IS 100% PRIVATELY FUNDED
*MECHANICAL/ ELECTRICAL SHALL BE UNDER
SEPARATE PERMIT

SHEET INDEX	DATE OF ISSUE			
	07/24/2019	08/14/2019	03/04/2020	
SK-00 COVER		●	●	
SK-01 PLOT PLAN	●	●	●	
SK-02 BASEMENT FLOOR PLAN	●	●	●	
SK-03 GROUND FLOOR PLAN	●	●	●	
SK-04 2ND FLOOR PLAN		●	●	
SK-05 3RD FLOOR PLAN		●	●	
SK-06 4TH FLOOR PLAN		●	●	
SK-07 PENTHOUSE PLAN		●	●	
SK-08 SQUARE FOOTAGES BASEMENT -1ST FLR		●	●	
SK-09 SQUARE FOOTAGES UNITS	●	●	●	

PLOT PLAN





PROJECT NAME

RELATIVITY
ARCHITECTS

THE V HOTEL
1217 S OCEAN FRONT WALK
VENICE, CA 90291

421 COLYTON STREET
2ND FLR, LA, CA. 90013
310.573.4300 | 213.232.3664 FX

REFERENCE | TITLE: PLOT PLAN

DATE: 03-04-2020

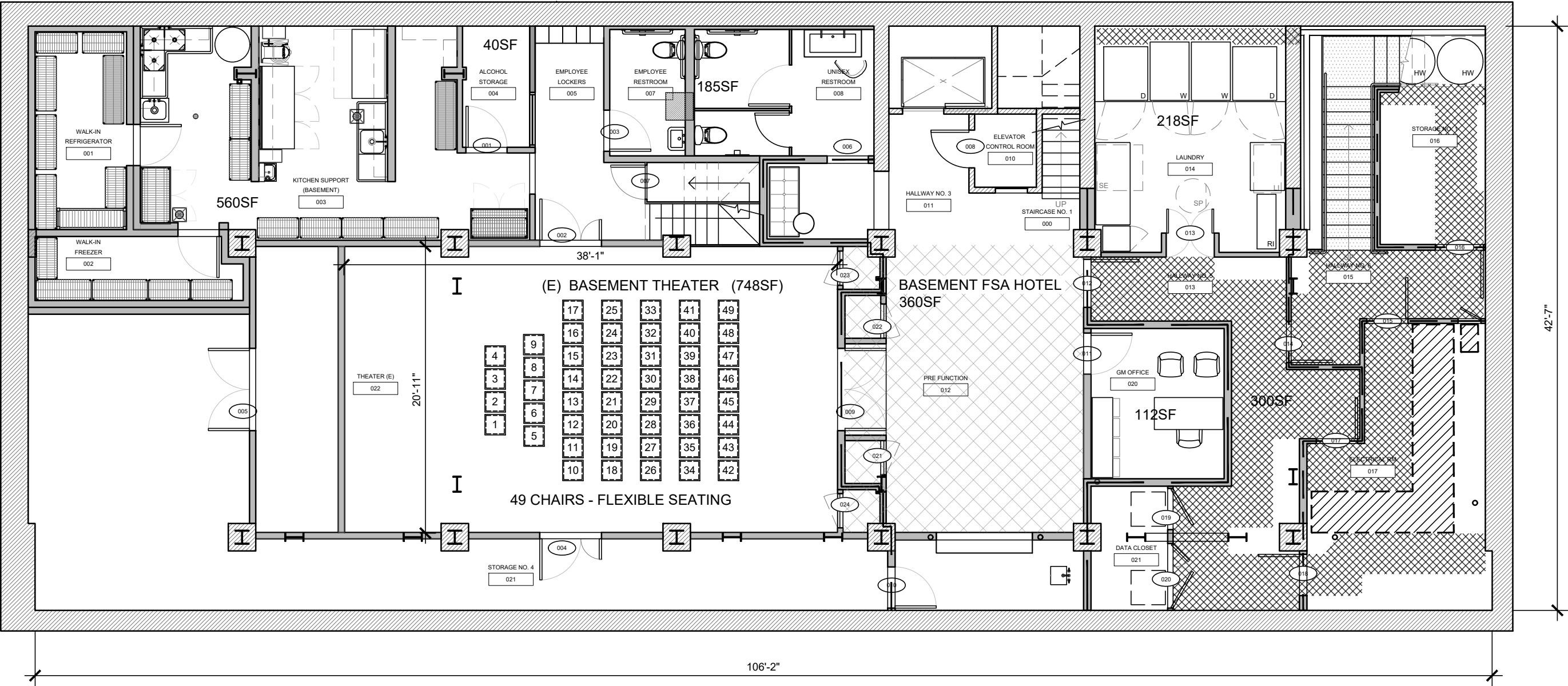


SK -
01

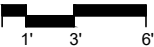
SCALE: 1/16" = 1'-0"

AREA CALCULATIONS

Location	SF	Seats
Alcohol Storage	45	-
Theater (E)	748	49



HOTEL FSA

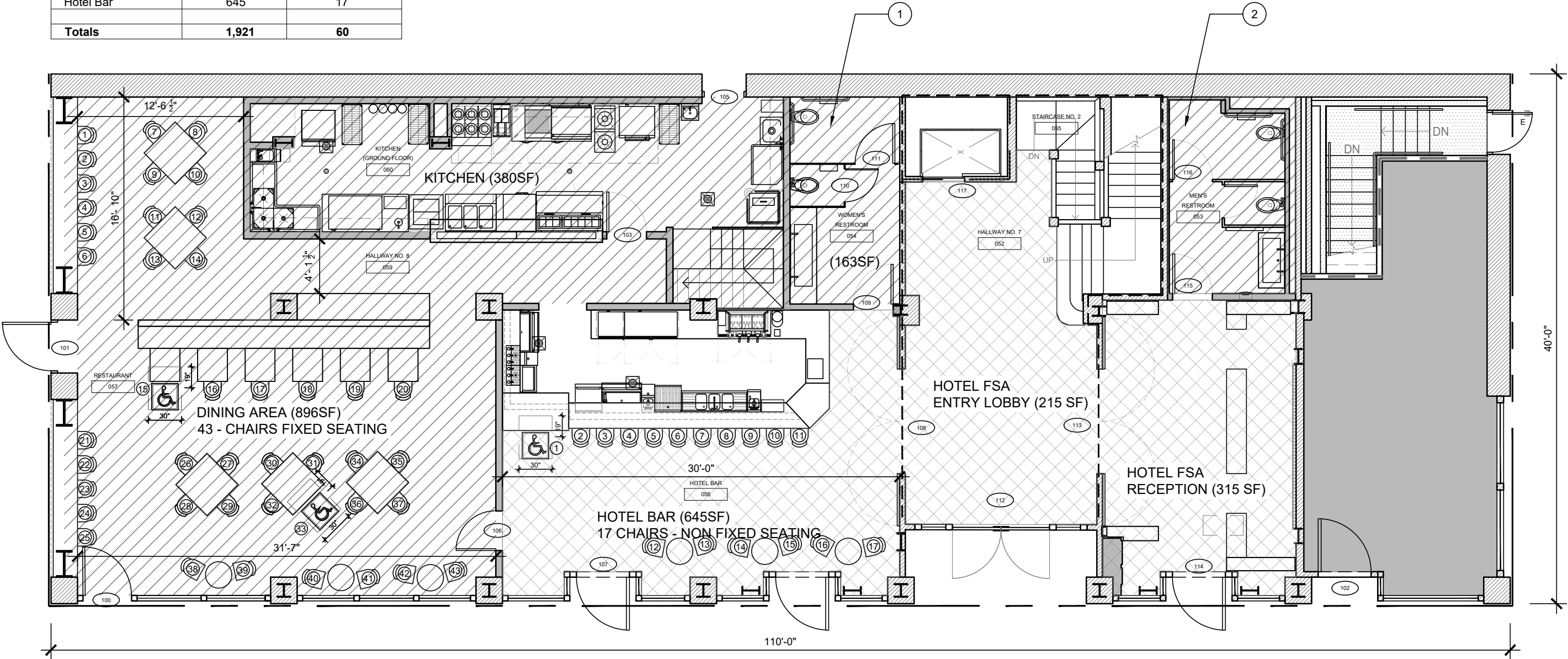


AREA CALCULATIONS

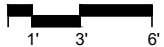
Location	SF	Seats
Restaurant	1,276	43
Hotel Bar	645	17
Totals	1,921	60

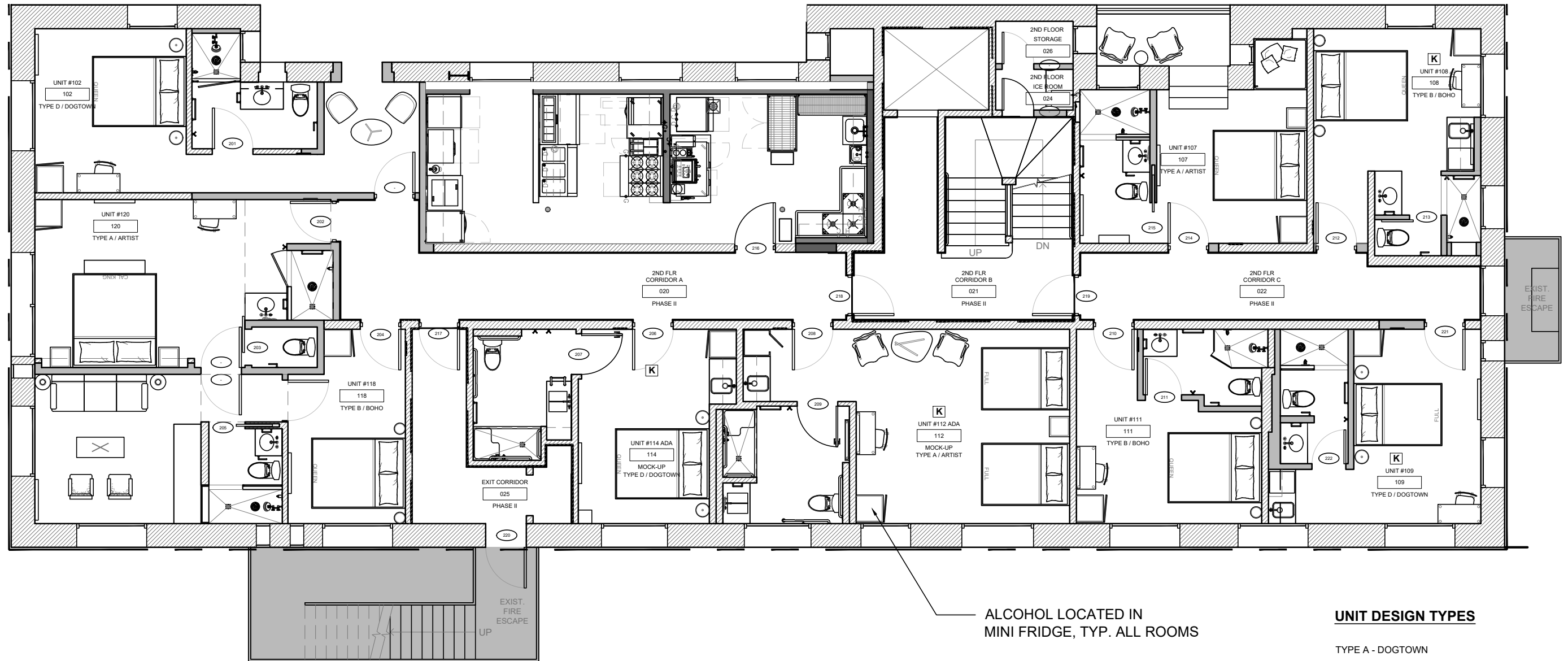
KEYNOTES:

- 1 WOMENS RESTROOM
- 2 MENS RESTROOM



RESTAURANT
HOTEL FSA





ALCOHOL LOCATED IN
MINI FRIDGE, TYP. ALL ROOMS

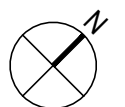
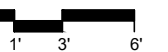
UNIT DESIGN TYPES

TYPE A - DOGTOWN

TYPE B - ARTIST

TYPE C - BOHO/HIPPIE

[K] - APT UNIT W/ KITCHEN POWER



SK -
04

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

PROJECT NAME

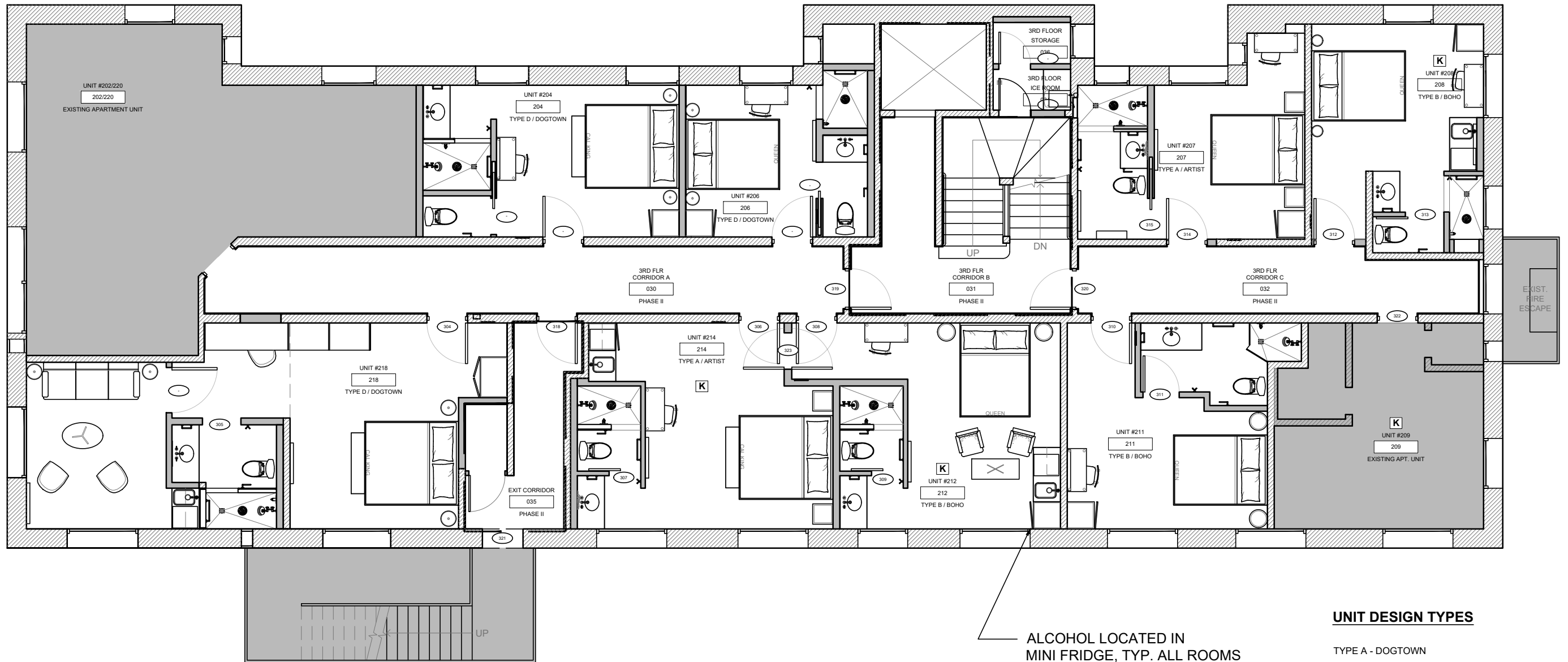
RELATIVITY
ARCHITECTS

THE V HOTEL
1217 S OCEAN FRONT WALK
VENICE, CA 90291

421 COLYTON STREET
2ND FLR, LA, CA. 90013
310.573.4300 | 213.232.3664 FX

REFERENCE | TITLE: 2ND FLOOR PLAN

DATE: 03-04-2020



PROJECT NAME

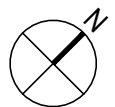
RELATIVITY
ARCHITECTS

THE V HOTEL
1217 S OCEAN FRONT WALK
VENICE, CA 90291

421 COLYTON STREET
2ND FLR, LA, CA. 90013
310.573.4300 | 213.232.3664 FX

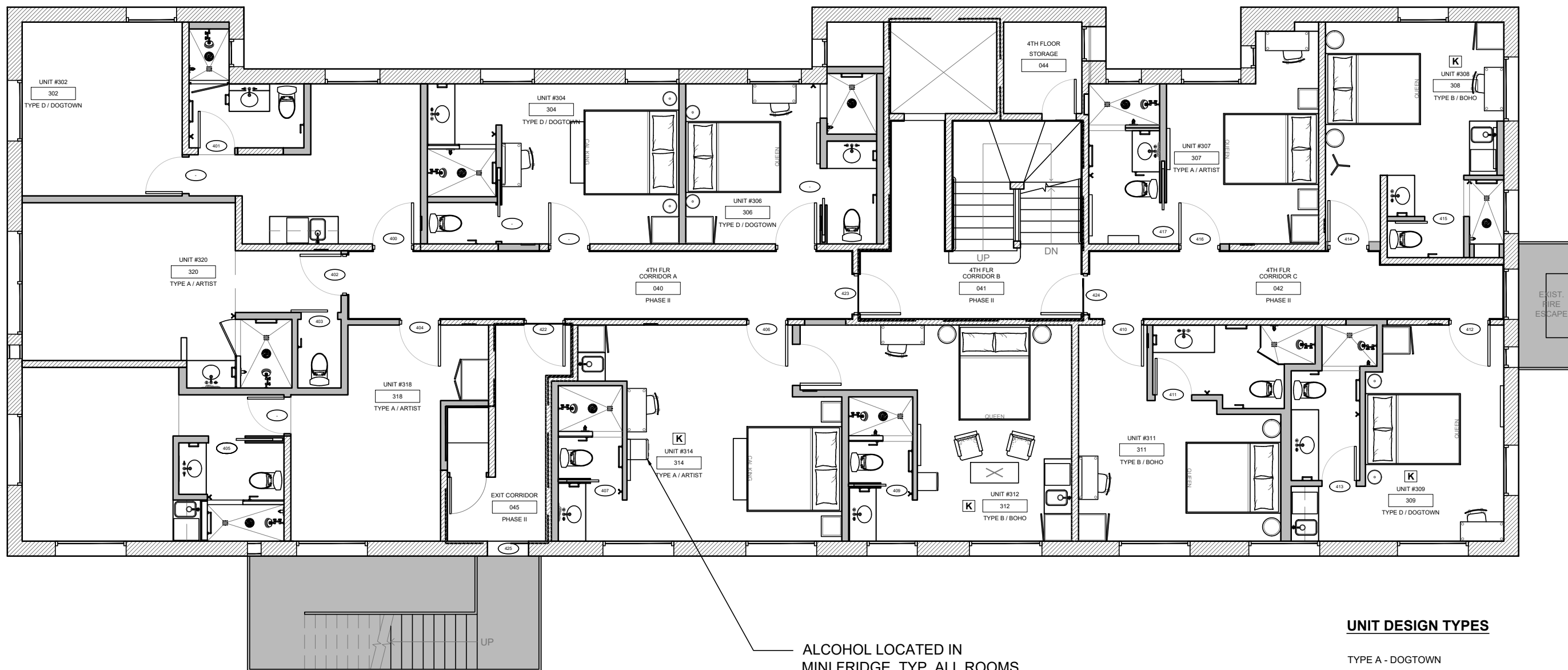
REFERENCE | TITLE: 3RD FLOOR PLAN

DATE: 03-04-2020

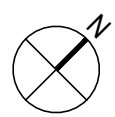
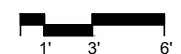


SK -
05

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

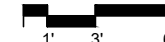
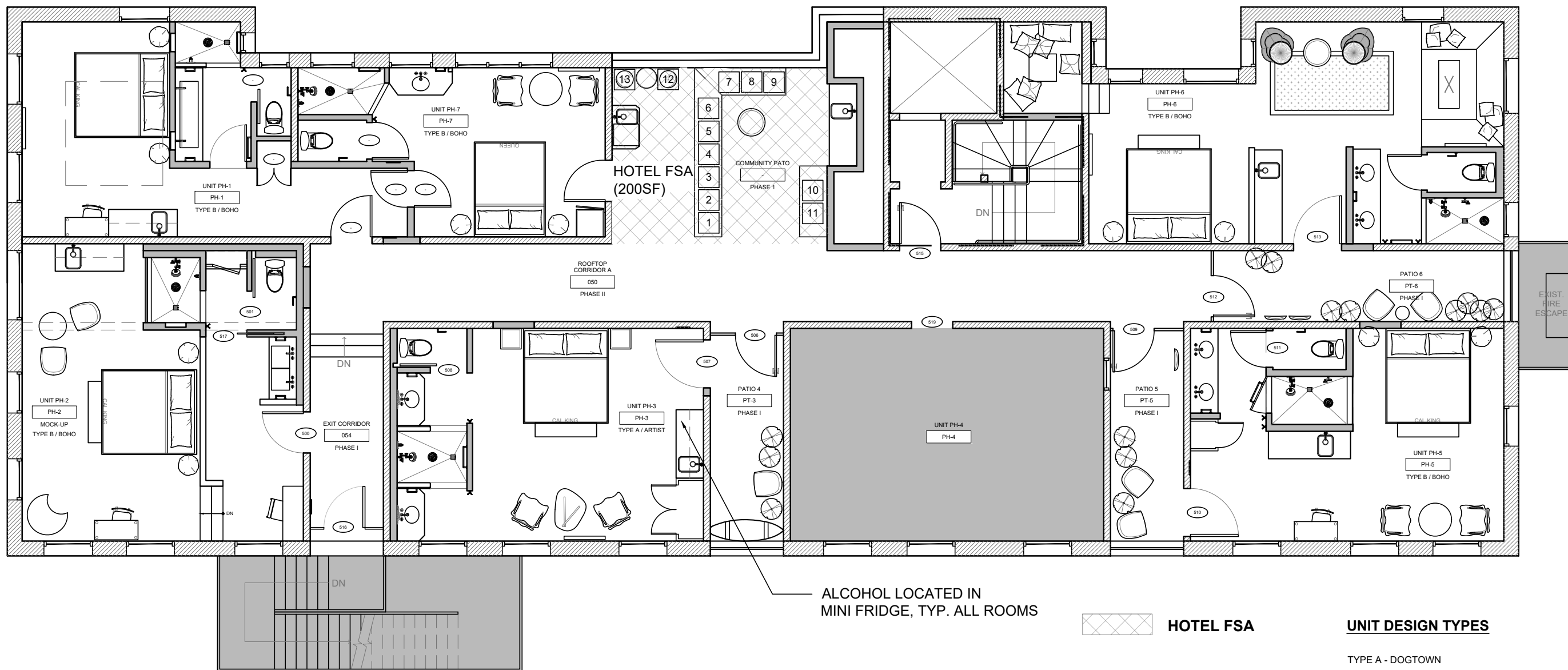


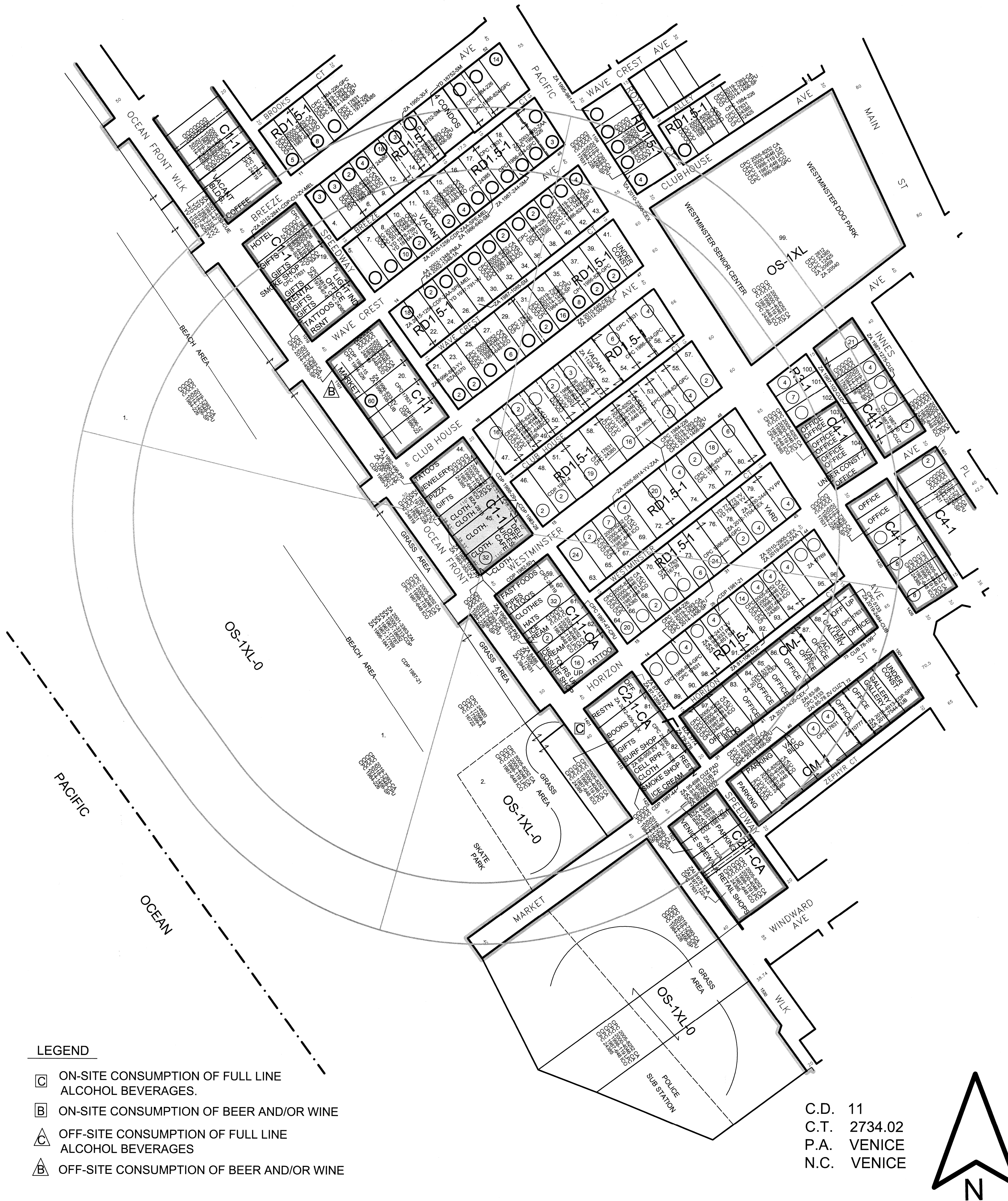
- UNIT DESIGN TYPES**
- TYPE A - DOGTOWN
 - TYPE B - ARTIST
 - TYPE C- BOHO/HIPPIE
 - [K] - APT UNIT W/ KITCHEN POWER



SK -
06

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

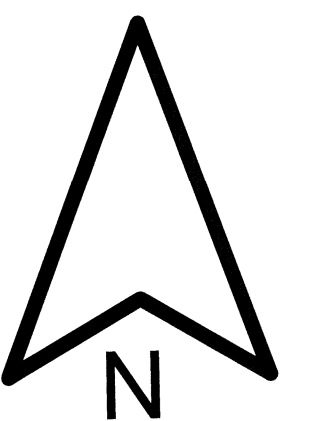




LEGEND

-  ON-SITE CONSUMPTION OF FULL LINE ALCOHOL BEVERAGES.
-  ON-SITE CONSUMPTION OF BEER AND/OR WINE
-  OFF-SITE CONSUMPTION OF FULL LINE ALCOHOL BEVERAGES
-  OFF-SITE CONSUMPTION OF BEER AND/OR WINE

C.D. 11
C.T. 2734.02
P.A. VENICE
N.C. VENICE



0.29 NET AC.

CONDITIONAL USE - ALCOHOL BEVERAGES

RADIUS MAPS ETC

3544 PORTOLA AVENUE
LOS ANGELES CA 90032
OFF/FAX (323) 221-4555
RADIUSMAPSETC@YAHOO.COM

SITE LOCATION:

1217 OCEAN FRONT WALK
VENICE CA 90291

LEGAL DESCRIPTION:

LOTS 3 TO 5, BLOCK 4, COUNTRY CLUB TRACT, M.B. 3-76.

CASE NO.:

DATE: 02 - 14 - 2020
SCALE: 1" = 100'
USES: FIELD
D.M.: 108 A 143
T.B. PAGE: 671 GRID: G-6
APN: 4226-005-004,023

EXHIBIT 2

LAW OFFICE OF JOHN P. GIVEN
2309 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

April 29, 2021

VIA US MAIL and EMAIL to vince.bertoni@lacity.org

Vince Bertoni
Director of Planning
Los Angeles City Hall
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

RE: Hotel conversion of 1217 Ocean Front Walk, Venice, CA 90291
Relevant Pending Planning Case No.: ZA-2020-1541-CUB-CU

Dear Director Bertoni:

I wrote to your attention more than thirteen months ago with respect to the above property, which had on March 5, 2020 initiated a CUB application premised on the notion that the application was for an existing hotel in conjunction with a bar and/or restaurant.¹

The record then available reflected no land use authorization existed to operate a hotel (or bar or restaurant) on the property. The building is not a hotel, and no land use authorization permits the short-term rental of residential units at the building.² City records show the 36-unit building is subject to and protected by the City's Rent Stabilization Ordinance, which makes the units ineligible to be rented on a short-term basis under Los Angeles Municipal Code section 12.22.A, subdivision (32) (part of the City's Home Sharing Ordinance, Los Angeles Ord. 185, 931, Sec. 6). As the HSO makes clear, "[a] Primary Residence that is subject to . . . Chapter 15 of the Los Angeles Municipal Code ("Rent Stabilization Ordinance") . . . is not eligible for home sharing." (LAMC, § 12.22.A(32)(c)(2)(ii)(b).)

My letter also provided evidence of a Coastal Commission notice of violation issued to the property in 2017 complaining of an unpermitted change of use from 36-unit apartment building

¹ My March 20, 2020 letter and exhibits regarding that project are attached to this letter. The primary application document describes the CUB project as follows: "A conditional use permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption, in conjunction with *an existing 26,241 sq. ft. hotel, including 36 rooms with 36 in-room minibars, a 645 sq. ft. bar with 17 seats located on the ground floor, a 1,276 sq. ft. restaurant having 43 interior seats located on the ground floor . . .*" Project application, p. 1, available at: <https://planning.lacity.org/pdiscaseinfo/document/NzUyOTk0/4596a256-522b-4c94-acc5-77ce1b3c8ef1/esubmit> (emphasis added).

² If the building ever was a hotel or ever allowed short-term rentals in the distant past, there is no evidence to suggest any vested rights that might once have existed long ago continue at present for what is now a nonconforming hotel or apartment hotel use within 500 feet of a residential zone. (LAMC § 12.13(A)(1.5); see also LAMC §§ 12.23(B)(9) (discontinuance of nonconforming building use) and 12.23(C)(1) (discontinuance of nonconforming use of land).) In Los Angeles, as in many cities, nonconforming uses of buildings and land have long been disfavored. (See, e.g., *Los Angeles v. Gage* (1954) 127 Cal. App. 2d 442, 460-461; *Spindler Realty Corp. v. Monning* (1966) 243 Cal. App. 2d 255, 269-270.)

to hotel. It is unclear whether this violation was ever resolved, but there exists no evidence of a Coastal Development Permit ever issued in support of a change of use to allow a hotel. Based on all of the available information, which appears to remain unchanged, I urged the Planning Department to either reject the CUB filing as incomplete under LAMC § 12.36(B) or require the applicant to amend the application to ensure all relevant approvals are concurrently reviewed as required by the municipal code.

The Planning Department's Case Summary web page for the CUB application has for months indicated that the case is "on hold."³ No public hearings have been scheduled, and no additional documents appear to be available in the public file for the case.

I write today to alert the Planning Department that, notwithstanding the lack of any land use authorization to operate a hotel and the City's clear prohibition on short-term rentals at RSO buildings such as 1217 Ocean Front Walk, the CUB applicant or applicant's agent has caused advertising for the "Venice V Hotel" to be published on the internet claiming the hotel will open to the public in June 2021 and apparently allowing online bookings to be made.⁴

The City is now going through its worst homelessness and housing crisis in modern history. Only steps away from this property many homeless individuals struggle to survive on a day-to-day basis without adequate safety, sanitation, or services. To allow the conversion of this or any multi-unit RSO building to a hotel or *de facto* hotel without any entitlement or public review process would be unconscionable, insulting the housed and unhoused residents of Venice and the City who are working so hard to find viable long-term solutions to the ongoing crisis.

I urge the Planning Department to undertake adequate investigation of this matter to ensure that the RSO building at 1217 Ocean Front Walk is not improperly converted to a hotel without an appropriate public review process, with all necessary discretionary entitlements including a Coastal Development Permit, and adequate environmental review.

Sincerely,



John Given

Cc (by email only):

Kevin Keller, Executive Officer, Dept. of City Planning
Honorable Mike Bonin (CD11)
Jason Douglas, Sr. Planning Deputy (CD11)
Len Nguyen, Sr. Planning Deputy (CD11)

³ See <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjMzMzMz0>, last checked April 29, 2021.

⁴ The topmost portion of the V Hotel webpage is attached as the last page of exhibits, and is available at: <https://www.venicevhotel.com> (last checked April 29, 2021). The March 2020 CUB application refers to the project as "The V Hotel." No property address is listed at the website, but it is evident the website refers to 1217 OFW.

LAW OFFICE OF JOHN P. GIVEN
2461 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

March 20, 2020

VIA US MAIL & EMAIL to vince.bertoni@lacity.org

Vince Bertoni
Director of Planning
Los Angeles Department of City Planning
Los Angeles City Hall
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

RE: ZA-2020-1541-CUB-CU
Property address: 1217 Ocean Front Walk, Venice, CA 90291

Dear Director Bertoni:

The above-captioned application, filed on March 5, 2020, requests a CUB for a purported 36-room hotel to provide for a full line of alcoholic beverages for on-site consumption including in 36 in-room minibars, a 645 square foot bar, and a 1,276 square foot restaurant. The Department of City Planning should be aware that the project description wrongfully assumes the prior approval by the City of Los Angeles and California Coastal Commission of a hotel and other changes of use that have never been issued.

The Coastal Commission issued a notice of violation of the California Coastal Act November 3, 2017 complaining of an unpermitted change of use from 36-unit apartment building to hotel.¹ The most recent publicly available certificate of occupancy for the site is not for a "hotel," but rather for an "apartment hotel."² The two designations sound similar but are not interchangeable. Based upon review of the publicly available information for the project address at the City's zimas.lacity.org website, there is no evidence to support that a change of use has been permitted by the City, that the requisite coastal development permit has been issued, or that the 2017 Coastal Commission violation has been resolved. It is also unclear when, if ever, the City approved a bar or restaurant at the site. Moreover, the site and units are subject to the City's Rent Stabilization Ordinance. Dwelling units are therefore not available for short-term rental, whether as never-approved hotel rooms or via short term rental (see LAMC 12.22.A(32)).

The proposed environmental review for the project—categorical exemption ENV-2020-1542-CE—is necessarily insufficient due to significant environmental impacts in the form of land use and planning conflicts that are not (and cannot be) mitigated. As the Coastal Commission notice of violation correctly explains, a conditional use permit from the City of Los Angeles is required

¹ See attached Exhibit A.

² See attached Exhibit B.

Vince Bertoni
Director, Dept. of City Planning
March 20, 2020
Page 2

to allow a hotel use within 500' of a residential zone. There is no evidence to suggest a CUP for the claimed ongoing hotel use has ever been approved.

The Department of City Planning should never have accepted the CUB application as complete. In addition to violating the Rent Stabilization Ordinance, the proposed project violates the City's multiple approvals ordinance (LA Municipal Code section 12.36), which states applicants "shall file applications at the same time for all approvals reasonably related and necessary to complete the project." (LAMC § 12.36(B).) For the CUB to be approved, the project would minimally require a conditional use permit to allow the change of use to hotel, a coastal development permit, among other entitlements, as well as proper environmental review through a mitigated negative declaration or environmental impact report that thoroughly analyzes the abundant land use and planning conflicts, and any other potentially significant environmental impacts.

I urge your office to either reject the filing entirely or to use its authority under Los Angeles municipal code section 12.36(B) to require the applicant to amend the application "to ensure that all relevant approvals are reviewed concurrently."

Sincerely,



John Given

Encls.

cc (by email only):

Department of City Planning
Kevin Keller, AICP, Executive Officer
Arthi Varma, Deputy Director, Citywide Policy Planning
Matthew Glesne, Citywide Policy Planning, Head of Housing Unit
Phillip Bazan, Management Analyst, Expedited Processing
Council District 11
Honorable Mike Bonin, Councilmember
Chad Molnar, Chief of Staff
Jason Douglas, Senior Planning Deputy
California Coastal Commission
John Ainsworth, Executive Director
Steve Hudson, District Director, South Coast District
Jordan Sanchez, Enforcement Analyst, South Coast District
Ira Koslow, President, Venice Neighborhood Council

EXHIBIT A

California Coastal Commission Notice of Violation, Nov. 3, 2017

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



**NOTICE OF VIOLATION OF THE CALIFORNIA COASTAL ACT
CERTIFIED AND REGULAR MAIL**

November 3, 2017

Venice Suites LLC
c/o Carl Lambert
2 Breeze Ave #101
Venice, CA 90291

Violation File Number: V-5-17-0128

Property Location: 1217 Ocean Front Walk, Los Angeles County APN 4226-005-004

Unpermitted Development¹: Unpermitted change in use from apartment to hotel

Dear Mr. Lambert:

As you know, the California Coastal Act² was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline through implementation of a comprehensive planning and regulatory program designed to manage conservation and development of coastal resources. The California Coastal Commission ("Commission") is the state agency created by, and charged with administering, the Coastal Act. In making its permit and land use planning decisions, the Commission carries out Coastal Act policies, which, amongst other goals, seek to protect and restore sensitive habitats; protect natural landforms; protect scenic landscapes and views of the sea; protect against loss of life and property from coastal hazards; and provide maximum public access to the sea.

Our staff has confirmed that unpermitted development activities have occurred on your property including, but not necessarily limited to, the unpermitted change in use from a 36-unit apartment building to hotel within the community commercial zone of Venice and within 500 feet of a

¹ Please note that the description herein of the violation at issue is not necessarily a complete list of all development on the subject property that is in violation of the Coastal Act and/or that may be of concern to the Commission. Accordingly, you should not treat the Commission's silence regarding (or failure to address) other development on the subject property as indicative of Commission acceptance of, or acquiescence in, any such development.

² The Coastal Act is codified in sections 30000 to 30900 of the California Public Resources Code. All further section references are to that code, and thus, to the Coastal Act, unless otherwise indicated.

residential zone³. As described on your website, the hotel is available for nightly rentals complete with an on-site office and set check in and check out times for guests. This change in use occurred on property owned by you and described as Assessor's Parcel Number (APN) 4226-005-004 ("subject property") and was not authorized by Coastal Exemption ("CEX") Nos. 5-05-108-X, 5-13-050-X, and 5-15-0290-X. The subject property is located within the dual-permit jurisdiction of the City of Los Angeles ("City") Coastal Zone.

Unpermitted Development

Commission staff has researched our permit files and found no evidence that coastal development permits have been issued for the development described above. Pursuant to Section 30600(a), any person wishing to perform or undertake development in the Coastal Zone must obtain a coastal development permit ("CDP") in addition to any other permit required by law. Any development activity conducted in the Coastal Zone, unless otherwise exempt, which is not the case here, without a valid coastal development permit constitutes a violation of the Coastal Act.

"Development" is defined, in relevant part, by Coastal Act Section 30106 as:

"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvest of major vegetation other than for agricultural purposes, kelp harvesting, and timber operations....(emphasis added)

The above described activity involves the change in use from apartment to hotel. Thus, the above described activity constitutes development under the Coastal Act that requires a coastal development permit. You have previously sought authorization for after-the-fact approval of change in use from apartment to hotel on another property, and, thus, you are aware of the CDP requirements for such development.

Background

In 2013, CEX No. 5-13-050-X was issued to you to exempt repairs on brick work on the front façade at the subject property and upgrade an existing restroom to ADA standards that you described in the exemption request as an "existing five-story apartment building."[underlining added for emphasis] In the project description, the CEX explicitly states that "The proposed

³ A conditional use permit from the City of Los Angeles is required to allow a transient occupancy residential structure within 500 feet of a residential zone. (Section 12.13.A1.5 of LAMC) Commission staff has received no record of such a permit

development is judged to be repair or maintenance activity not resulting in an addition to or enlargement or expansion of the object of such activities ..." and, thus, did not authorize a change in use from apartment to hotel, nor was such a change applied for. In 2015 a CEX No. 5-15-0290-X was issued to you for, among other things that you describe in your application, "partial demolition of interior wall (10'-4" x 9'-3")", removal of interior staircase, remodel of bathroom with ADA accessible features, and construction of new 34" high counter area and overhead (rolling) door within new wall opening". Thus, no change in use from apartment to hotel was applied for or authorized by these exemptions issued to you by the Commission. Furthermore, both CEX's state:

Please be advised that only the project described above is exempt from the permit requirements of the Coastal Act. Any change in the project may cause it to lose its exempt status. This certification is based on information provided by the recipient of this letter. If, at a later date, this information is found to be incorrect or incomplete, this letter will become invalid, and any development occurring at that time must cease until a Coastal Development Permit is obtained.

The information that you submitted at the time of the applications did not identify the building at issue as a hotel, despite the fact that by 2013, the date of the first CEX, you were operating the building as a hotel, and Commission staff was not made aware of the change in use from apartment to hotel on the subject property that had occurred without the required coastal development permit. In no way did the CEXs described above authorize the change of use from apartment to hotel. Additionally, in 2015 you applied for CEX No. 5-15-0295-X, which was rejected by Commission staff due to concerns over the use of the building, as described here:

The proposed project is a change of use from general retail space to a commercial kitchen within an existing retail store. An associated business/establishment has not been identified in relation to the proposed commercial kitchen. A kitchen is not a normal accessory to retail use. The proposed change in use will eliminate retail use and constitutes a change in intensity of use. Therefore, the proposed project does not qualify for an exemption. Please apply to the City of a Coastal Development Permit (CDP), and then apply to the Coastal Commission for a dual CDP (if the City grants the local CDP).

Although this work was not authorized via CEX No. 5-15-0295, you applied to LADBS and had the work authorized via Building Permit No. 16016-10000-21138 to convert a portion of second floor to kitchen area to serve for "hotel guests only", in what appears to be an avoidance of the coastal development permit process. Ultimately, the building permit was never issued and did not receive Coastal Zone clearance from LADBS, meaning the project did not obtain the required authorization from both the City and the Commission. The example provided above is characteristic of what appears to be your attempts to piece meal the change in use through the building permit process, instead of obtaining required coastal development permits. Additionally, in 2016 you applied for CEX No. 5-16-0406, but it was rejected by Commission due to concerns regarding the threshold of development allowed for exemptions, as described here:

The plans submitted with the proposed project show an extensive remodel and possible combining of designated uses and spaces. The proposed project is similar to an exemption request (5-15-0295-X) that was denied on September 30, 2015. The proposed

project exceeds the threshold that is typical of exempt projects and deserved a thorough review. Please apply to the City of a Coastal Development Permit (CDP), and then apply to the Coastal Commission for a dual CDP (if the City grants the local CDP).

As stated above, any change in use to the subject property requires a coastal development permit. In this location a CDP from both the City of Los Angeles and the Commission is required since the property is located in the dual-permit jurisdiction.

Resolution

In many cases, violations involving unpermitted development may be resolved administratively by removal of the unpermitted development and restoration of any damaged resources. As the development you have undertaken is unpermitted and in violation of the Coastal Act, you must apply to the Commission to seek after-the-fact approval of the change in use on the subject property immediately upon obtaining a CDP from the City of Los Angeles, if a CDP is approved, and the Commission will review the application for consistency with Coastal Act and any applicable local land use policies. In order to resolve this case, please apply to the City of Los Angeles for a CDP by December 3, 2017 and provide Commission staff with written confirmation of your filed application with the City.

Please contact me by no later than **November 20, 2017** regarding how you intend to resolve this violation.

Enforcement Remedies

While we are hopeful that we can resolve this matter informally, please be advised that, in addition to the administrative penalty authority described above, the Coastal Act has a number of additional potential remedies to address violations of the Coastal Act, including the following:

Coastal Act Section 30809 states that if the Executive Director of the Commission determines that any person has undertaken, or is threatening to undertake, any activity that requires a permit from the Coastal Commission without first securing a permit, the Executive Director may issue an order directing that person to cease and desist. A cease and desist order may be subject to terms and conditions that are necessary to avoid irreparable injury to the area or to ensure compliance with the Coastal Act.

Additionally, Sections 30803 and 30805 authorize the Commission to initiate litigation to seek injunctive relief and an award of civil fines in response to any violation of the Coastal Act. Section 30820(a)(1) provides that any person who undertakes development in violation of the Coastal Act may be subject to a penalty amount that shall not exceed \$30,000 and shall not be less than \$500 per violation. Section 30820(b) states that, in addition to any other penalties, any person who "knowingly and intentionally" performs or undertakes any development in violation of the Coastal Act can be subject to a civil penalty of not less than \$1,000 nor more than \$15,000 per violation for each day in which the violation persists.

Thank you for your attention to this matter. We look forward to working with you to resolve this matter. If you have any questions regarding this letter or the pending enforcement case, please

November 3, 2017

Page 5 of 5

feel free to contact me at 562-590-5071 or in my absence please contact Andrew Willis at this same number.

Sincerely,



Jordan Sanchez
Enforcement Officer

cc:

Lisa Haage, Chief of Enforcement, CCC
Andrew Willis, Enforcement Supervisor, CCC
Steve Hudson, Deputy Director, CCC
Teresa Henry, District Manager, CCC
Chuck Posner, Planning Supervisor, CCC
Susan McCabe

EXHIBIT B

Certificates of Occupancy, 1217 Ocean Front Walk

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy
Must be approved by the Department of
Building and Safety.

Address of Building 1217 Ocean Front ^{WALK}
Permit No. and Year LA83620 1954
Certificate Issued 1954 19

This certifies that, so far as ascertained by or made known to the undersigned, the building at above address complies with the applicable requirements of the Municipal Code, as follows: Ch 1, as to permitted uses; Ch 9, Arts. II, 3, 4, and 5; and with applicable requirements of State Housing Act, for following occupancies:

Five-story, Type 111B, 40'x110' Apartment Hotel, 15 apartments and 21 guest rooms converted from 19 apartments and 17 guest rooms; C-1/B-2/H-4 Occupancies

Owner: Mr. Abe Barenfeld
Owner's Address: 401 S. McCadden Pl.
Los Angeles 5, Calif.

Form B-95-a-20M-11-53 G. E. MORRIS, Superintendent of Building

JOHN D. MILLER

By I. H. Frazer d/h

Address of Building 1217-19 Ocean Front
5 - 9 Westminster Avenue
Permit No. 67569/64, WLA54382/64
and Year 93583/65, LA10021/65
Certificate 15969/65, 92792/65
Issued January 27, 1967

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

REHABILITATION
CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the deficiencies in this building have been corrected and the building complies with the applicable requirements of Division 49, Article 1, Chapter 9 of the Municipal Code for the following occupancies:

Five-Story Type III-A, 40' x 110' Apartment Hotel.
11 Apartments, 22 Light-Housekeeping rooms & 3-Guest Rms.
H-4, G-1 & G-2 Occupancies. X21399

EXCEPT FOR DEVIATIONS APPROVED BY
BOARD OF BLDG. & SAFETY COMMISSIONERS

Owner: Mr. George Linney
Owner's 5 - Westminster Avenue
Address Venice, California 90291

Form B1106-20M-12-52  Superintendent of Building By C. M. WILSON/tb

Address of Building 1217 Ocean Front Walk

CITY OF LOS ANGELES
CERTIFICATE OF OCCUPANCY



NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety. This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Act—for following occupancies:

Issued 3-28-69 Permit No. and Year WLA76575/69

(Convert approximately 18' x 40' portion of existing 5 story, type III-A, 40' x 110', restaurant, apartment-hotel and commercial building to theatre, G-1/G-2/H-4 occupancy.

Owner G.R. Lenney & J.T. Corrodi (owners)
Owner's J. Ciampa (tenant)
Address 1217 Ocean Front Walk
Venice, California

Form B-95b—1500 Sheet Sets—8-68 (C-10)

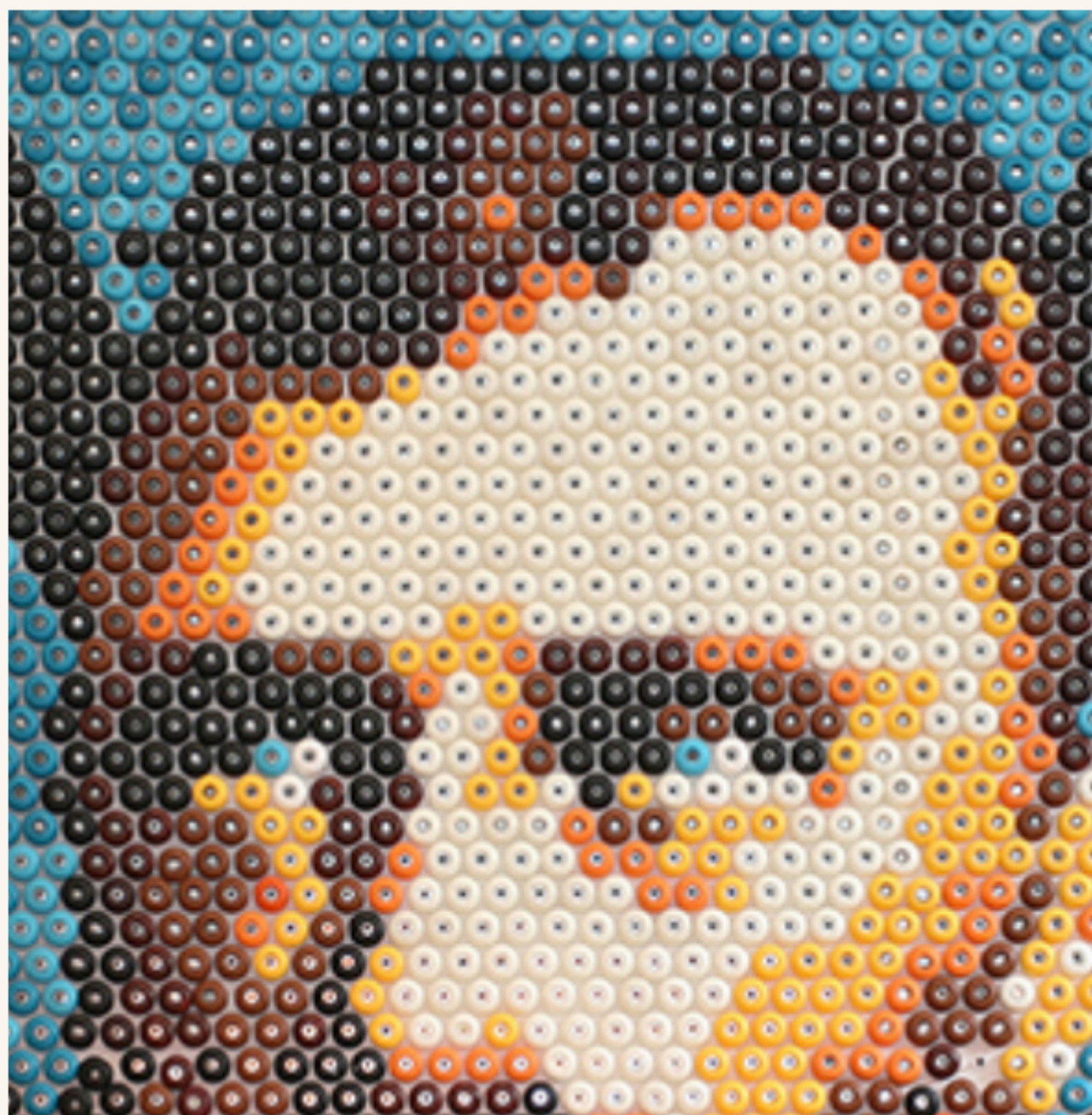
By A.E. HEWITT:cc



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Opening June, 2021



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From its original residents Charlie Chaplin and the Z-Boys of Dogtown, our historic hotel has been home to some of California's most

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OK



Planning APC West LA <apcwestla@lacity.org>

From Alley Bean re: Waldorf AKA Venice V Hotel Hearing Wednesday

a@orsonbean.com <a@orsonbean.com>

Sun, Mar 3, 2024 at 9:28 PM

To: Ira Brown <Ira.Brown@lacity.org>, West LA Planning Commission <apcwestla@lacity.org>

Dear Ira Brown and West LA Planning Commissioners,

I am writing in regards to the appeal hearing this Wednesday at the West LA Area Planning Commission about the proposed liquor license and restaurant and theater additions to the Waldorf building located on the Venice boardwalk.

As I know you are all acutely aware, we in Venice, (and in the entire city of Los Angeles) are in an affordable housing crisis.

It is because of this very crisis that I call upon the Planning Commission today not to support the conversion of already existing affordable housing so desperately needed in Venice, to an expensive boutique hotel, the Venice V Hotel, with commercial uses on the ground floor and in the basement, by granting them these premature add-ons.

I do not understand why you are having a hearing about just the liquor license in conjunction with a restaurant and theater in the lobby/basement of this Boutique Hotel before the Hotel has even been approved by the Coastal Commission and given a CDP? You cannot ignore what is going on in terms of the unpermitted change of use to hotel in the rest of the building.

There is an understandable cry for more development of affordable units in Venice during this Housing crisis, but there is absolutely no justification that I can see of taking existing RSO affordable Apartment units and changing their use to expensive luxury hotel rooms.

We are in an affordable HOUSING crisis in Los Angeles and in Venice, not a luxury hotel room crisis.

Please, Commissioners, for the sake of the Venetians losing their affordable residences at a fast pace (this developer alone has taken away over 150 RSO residences to date, tellingly having all of his former long term tenants who have "voluntarily moved out" sign non-disclosure agreements), we call on you to deny this request for more profit making add-ons to make the building into a full service Hotel from what is basically still an unauthorized Hotel.

We call on you to do what is ethically, morally and legally right, and to at least wait until the City and the Coastal Commission have made a determination on the conversion of these much needed rent stabilized residences into a mixed use Hotel. The powers that be must consider what would best benefit the community of Venice at such a dire time as this for affordable housing.

Thank you for your kind attention.

Gratefully,
Alley Bean

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

March 4, 2024

West Los Angeles Area Planning Commission
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012

Re: 1217 Ocean Front Walk
ZA-2021-7223-CUB-CU-CDP-1A
ENV-2021-7224-CE
SUPPORT APPEALS

Members of the West Los Angeles Area Planning Commission,

I'm writing to support the appeals and to oppose the granting of the requested entitlements for the project located at 1217 Ocean Front Walk. The project is not exempt from CEQA, and the required findings can't be made to grant the permit to serve alcohol.

City Planning has improperly determined that the project is exempt from CEQA. In fact, the commercial uses requested will have significant impacts on the surrounding community, which contains many residential uses, in addition to sensitive receptors.

Also, the required findings for granting a liquor permit can't be made. The area already suffers from an over-concentration of establishments selling alcohol. The granting of the permit will have negative impacts on the surrounding community. Crime is already high in Venice. Decades of research show that there is a relation between an increased number of locations selling alcoholic beverages on-site and violent crime. Also, per LAPD Chief Michael Moore, the number of DUIs is rising, one of the factors that has led to a staggering increase in pedestrian deaths in the City of LA.

I urge you to uphold the appeals.

Thank you for your time.

Casey Maddren
2141 Cahuenga, Apt. 17
Los Angeles, CA 90068



Planning APC West LA <apcwestla@lacity.org>

Keep our neighborhoods safe for the people who live here - not hotel guests who are only here a few days. We need protection

Donna Grillo <vinidon@aol.com>

Mon, Mar 4, 2024 at 8:38 AM

To: "Ira.Brown@lacity.org" <ira.brown@lacity.org>, "apcwestla@lacity.org" <apcwestla@lacity.org>

The people of Los Angeles are in a severe crises and need our city leaders to protect us.

PLEASE....

Uphold the appeals and deny approval of the requested Conditional Use Permit & Coastal Development Permit Car # : (ZA-2020-1541-CUB-CU) for sale and dispensing of a full line of alcoholic beverages.

Best regards,
Donna Grillo

[Donna's Casting Website](#)
[Donna's IMDB Credits](#)
[Facebook Casting Page](#)
[Demos on Soundcloud](#)
[Donna's Blog](#)

"Surround yourself with people whose eyes light up when they see you and who have no agenda for your reform."



Planning APC West LA <apcwestla@lacity.org>

ZA-2021-7223-CUB-CU-CDP-1A

Djsamuels <djsamuels@ca.rr.com>

Mon, Mar 4, 2024 at 3:15 PM

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

Mr. Brown,

When is enough enough? Homelessness is on the rise, the City of LA lacks sufficient affordable housing stock, and long term tenants are being evicted from RSO homes. Carl Lambert is well known in Venice for greasing palms and getting his way with those making development decisions for the City so that he can increase his net worth. In the meantime, the ex-tenants in the apartment buildings he has bought and converted to hotels, illegally, are either living on the streets or have moved out of LA.

The conversion of this long term RSO building to an apartment hotel is an example of a bad ruling by the Planning Department.

I disapprove of the CUB application for this location.

Deidre Samuels



February 26, 2024

West Los Angeles Area Planning Commission

Re: 1217 Ocean Front Walk

Dear Commissioners,

This letter expresses the official position of the Venice Chamber of Commerce regarding the vital need to approve the restaurant development at 1217 Ocean Front Walk along with all necessary permits for the Hotel in which it resides in order to ensure it can serve as a first-class, competitive, visitor-serving amenity.

The Venice Chamber is the oldest existing organization in Venice, predating its original incorporation as an independent city. We are the voice of the Venice business community and Abbot Kinney, creator of Venice of America, was one of the founders. We carry his guiding principles forward to this day.

One of those principles, as recounted by the LA Daily Examiner upon the opening of the city on July 4, 1905, was that Venice was specifically created to "infuse new interest in coast life and attract thousands of people from distant lands, for at Venice will be found all of the comforts and amusements of Italy and the south of France with the added attraction of the incomparable climate of Southern California."

The creator's intent was for Venice to serve as a gathering place for visitors to ENJOY Southern California. The wisdom of the General Assembly in creating the Coastal Act was singularly to ensure access to California's coast and provide visitor serving amenities thereupon. Sadly, the primary intent of Section 3 of the Coastal Act has been ignored.

The restaurant at 1217 Ocean Front Walk and the Hotel in which it resides unmistakably fulfill every single requirement of the Coastal Act as expressed by Venice's founder Abbot Kinney. More importantly, as per your mandate, this application meets all regulations of City Planning and the Venice Specific Plan.

The Venice Chamber of Commerce urges you to unanimously support this project. We also urge you to reach out to the Venice community and dive much deeper into the project's history and support. Hopefully, you will conclude as we did, that this project ultimately will be a tremendous benefit to the health and welfare of the community and entire city.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "George Francisco", written over a horizontal line.

George Francisco
Director of Policy & Planning
Venice Chamber of Commerce

Cc: Karen Bass, Traci Park, Rachel Freeman, Kevin Keller, Jeff Kau, William Lamborn, Los Angeles City Planning Commission.

LAW OFFICE OF JOHN P. GIVEN
2309 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

March 4, 2024

Submitted by email only to apcwestla@lacity.org

West LA Area Planning Commission
Felicia Mahood Multipurpose Center
11338 Santa Monica Boulevard
Los Angeles, CA 90025

RE: ZA-2021-7223-CUB-CU-CDP-1A (1217 S. Ocean Front Walk)

Honorable Members of the West LA Area Planning Commission:

This letter is submitted on behalf of Keep Neighborhoods First (“KNF”) in support of the above-captioned appeal. The intention of this brief submission is not to be a substitute for KNF’s original 23-page submission, but to assist the Commission by summarizing KNF’s appeal arguments and highlighting certain record evidence. In addition, KNF has coordinated with appellant Citizens Preserving Venice to draft alternative findings in support of a grant of their appeals, which these appellants will respectfully submit for the Commission’s consideration. (They will be submitted under separate cover by appellant Citizens Preserving Venice.

Based on the overwhelming record evidence, it is abundantly clear that the ZA erred or abused his discretion in approving the requested entitlements and determining the action to be exempt from environmental review. KNF urges the Commission to grant all four appeals.

I. The Building’s History and Prior Case Filings are Highly Relevant.

The history of 1217 Ocean Front Walk is highly relevant to the matter before the Commission. It is repeatedly cited in the ZA’s determination in the case. Historic certificates of occupancy more than five decades old are improperly relied upon by both the applicant and the ZA to justify the ZA’s decision. Appellants also rely on substantial evidence in the record (including evidence submitted by or on behalf of the applicant) regarding the subject property’s use over past decades to show why the present entitlements cannot be lawfully granted.

Moreover, because the approvals at issue require an environmental clearance, and because a CEQA administrative record “will include pretty much everything that ever came near a proposed development,”¹ previous iterations of this project are not only relevant, but highly probative of the applicant’s intention that the requested entitlements are intended to serve an existing *hotel*. The previous application (ZA-2020-1541-CUB-CU-CDP) is littered with references to the application being in support of a hotel. It was listed by the applicant as

¹ *County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.

“pending” when the modified case was filed.² Indeed, when the Venice Neighborhood Council’s Land Use and Planning Committee heard the item, both cases were listed together on its agenda.³

The applicant’s withdrawal of the earlier case, changing the project title (from “The V Hotel & Restaurant” to “Venice Waldorf & Restaurant”), and largely excising the term “hotel” from the plot plans and application materials doesn’t change the basic fact that the requested entitlements are made in support of a *hotel*, not an apartment hotel. Nor do those changes to the project paperwork erase the mountain of evidence showing the applicant has been using and continues to use the property as a *de facto* hotel, as acknowledged by the applicant’s representative in *this* case, and as evidenced by the advertising for the property as a hotel.⁴

There is a huge problem with the *de facto* hotel use: it is not lawful.

The evidence, including evidence submitted by or on behalf of the applicant, overwhelmingly shows the building is not a hotel, but an apartment hotel. The evidence overwhelmingly shows the building is subject to the City’s Rent Stabilization Ordinance, and City agencies charged with interpreting City ordinances to do with zoning and housing clearly state that RSO properties are not eligible for short-term rentals.

The multiple 1960s era certificates of occupancy submitted by the applicant show an apartment hotel, not a hotel. The Los Angeles Housing Department (“LAHD”) investigated illegal short-term rentals at this RSO building and concluded: “The 1967-CofO describes the building as an Apartment Hotel and therefore it is neither a Hotel/Motel, Transient Occupancy Residential Structure nor a Bed and Breakfast facility, as these terms are defined in the Zoning Code.” LAHD thus determined that “the Property is not exempt from [the City’s Home Sharing Ordinance] and therefore, any short-term rental activity at the building is subject to the requirements set forth in the HSO.” Per LAHD, short-term rental is not permitted at the property under either the HSO’s “Primary Residence Test” or Multiple Home-Sharing Operations Test.”⁵

The Department of City Planning’s interpretation of the Zoning Code agrees: “As clarified by Matt Glesne, who wrote the Home-Sharing Ordinance, apartment hotels are not exempt from the Home-Sharing Ordinance, therefore we are inclined to uphold this citation.”⁶ The City has not granted a contemporary entitlement to operate a hotel at 1217 Ocean Front Walk, and no evidence supports the ongoing *de facto* hotel use is authorized. The applicant impliedly argues that because the property was once a hotel that use may be re-established whenever desired.

That is not how the land use entitlement process works.

² ZA-2021-7223-CUB-CU-CDP Application, p. 3 (“ZA_Commission_Packet_3.6.24.pdf,” hereafter “Packet,” pdf p. 159); see John P. Given letter to Ira Brown, March 14, 2022 (Packet, pdf pp. 20-28).

³ Venice Neighborhood Council, LUPC Staff Report (Packet, pdf p. 228).

⁴ Elizabeth Peterson Group submission to Ira Brown, Oct. 1, 2021 (Packet, pdf p. 277: “Now known as the Venice V Hotel (<https://venicevhotel.com/>), the property is being managed as short-term rentals...”).

⁵ Hatim Fatehi, LAHD Principal Inspector, June 22, 2022 memorandum (Packet, pdf p. 431.)

⁶ Joann Lim, City Planner, email to Darren Martinez, Feb. 18, 2022 (Packet, pdf p. 493.)

The evidence also shows that a restaurant and theater that may have existed in the past, but have not been continuous and were not in place when the applicant acquired the property. As Mr. Lambert’s representative explained, in a submission for *this* application: “The ground floor of the building was and continues to be occupied by commercial businesses; a retail store, sandwich shop, juice shop and coffee shop. The theater was being used as a recording and art studio prior to Mr. Lambert’s purchase of the property. It is currently used as storage.”⁷

In addition, the applicant continues to show complete disdain for the limitations placed on the use of the property even by the ZA who approved the instant application. The ZA determination unequivocally states the “**property owner cannot conduct a transient use until the RSO exemption for the non-apartment-dwelling-units is approved by the LAHD,**”⁸ but the V Hotel continues to book properties for overnight stays without any record existing of such an authorization and in the face of unresolved complaints of numerous violations of the Home Sharing Ordinance. The attached website screen capture pages shows rooms at the V Hotel continue to be available for short-term rental despite the continuing restrictions, including those noted in the ZA Determination.⁹

II. The ZA Approval Violates Zoning Code sections 12.23 and 12.36.

In Los Angeles, when a land use applicant requests approval of entitlements, it must “file applications at the same time for all approvals reasonably related and necessary to complete the project.” (Los Angeles Municipal Code (“LAMC”), § 12.36.) This zoning regulation keeps an applicant from splitting a bigger project into smaller components and thereby evading review of the entirety of the project. It is essentially the land use equivalent of CEQA’s strict prohibition against project piecemealing.¹⁰

In addition, when cities change their zoning codes existing lawful uses sometimes become nonconforming. Because “public policy disfavors nonconforming uses” most cities disallow nonconforming uses when they have been discontinued for some period.¹¹ Los Angeles’s nonconforming use provision provides: “A building or structure or portion or [sic] a building or structure, which contains a nonconforming use which is discontinued for a continuous period of one year, shall only be occupied by a use that conforms to the current use regulations of the zone and other applicable current land use regulations.” (LAMC, § 12.23.B(9).)

According to the *applicant’s own submissions* and other substantial evidence in the record, neither the restaurant nor theater uses existed in the building when it was purchased by the applicant and were not existing for a significant period of time. KNF concedes that the

⁷ Elizabeth Peterson Group submission, *supra* note 4 (Packet, pdf p. 276).

⁸ ZA Determination, Aug. 8, 2023, p. 30 (Packet, pdf. p. 126).

⁹ Screen captures of booking pages from <https://venicevhotel.com/> by author on March 4, 2024 are attached. Rooms at the V Hotel can also be booked at *booking.com*, *Expedia*, and many other online sites.

¹⁰ See *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 283-284.

¹¹ *San Francisco Planning Etc. Assn. v. Central Permit Bureau* (1973) 30 Cal.App.3d 920, 926; see also *County of San Diego v. McClurken* (1951) 37 Cal.2d 683, 687.

zoning code permits a restaurant at the building. But to re-establish this use, LAMC section 12.23.B(9) requires the currently applicable zoning regulations to be followed, including parking regulations.¹² Under the same provision, the discontinued theater use may not be re-established without an additional entitlement (a variance or zone change), because a theater use is no longer permitted in the zone.¹³

There is no evidence that a de facto hotel use was *ever* permitted once the building was converted to an Apartment Hotel. Before the HSO was established, short-term rentals were generally not permitted under the City's zoning code.¹⁴ The allegation that when the applicant acquired the property "[s]everal of the tenants were renting units for short-term stays on Airbnb" does not vest any right to short-term rental use since it was then, and continues to be, unlawful. "No vested right to violate an ordinance may be acquired by continued violations."¹⁵

The project requires additional entitlements before clearly non-conforming uses may be re-established at the subject property. Moreover, it is self-evident that a CUB for alcohol at a theater cannot be granted if the theater itself is not allowed. The ZA erred and abused his discretion by ignoring the requirements of the City's Multiple Approvals and Non-Conforming Use Ordinances (respectively, LAMC sections 12.23.B and 12.36).

III. The ZA Analysis of the Coastal Development Permit is Grossly Inadequate.

The ZA determination provides a grossly inadequate analysis in that it does not correctly apply the law, including the City's zoning code and Venice Coastal Land Use Plan, based on the substantial factual evidence presented. As discussed, the applicant acknowledged that at the time he acquired and later applied for the instant entitlements (*years* later in 2021), the subject property included neither a restaurant nor a basement theater:

The ground floor of the building was and continues to be occupied by commercial businesses; a retail store, sandwich shop, juice shop and coffee shop. The theater was being used as a recording and art studio prior to Mr. Lambert's purchase of the property. It is currently used as storage.¹⁶

Substantial evidence shows the restaurant and theater uses had both been discontinued for years, as documented in the record. For example, KNF's appeal recounts the testimony and submissions of Pamela London, Michael Jensen, and the applicant.¹⁷

¹² See KNF Appeal, pp. 8-9 (Packet, pdf pp. 64-65).

¹³ *Id.*, p. 9 (Packet, pdf p. 65).

¹⁴ See Department of City Planning Recommendation Report, Planning Case DIR-2016-1243-CA, p. A-2, available at https://clkrep.lacity.org/online/docs/2014/14-1635-S2_misc_2_10-26-2016.pdf; see also *Chen v. Kraft* (2016) 243 Cal.App.4th Supp. 13.

¹⁵ *City of Monterey v. Carrnshimba* (2013) 215 Cal.App.4th 1068, 1098, quoting *Acker v. Baldwin* (1941) 18 Cal.2d 341, 346 (cleaned up).

¹⁶ Elizabeth Peterson Group submission, *supra* note 4 (Packet, pdf p. 276).

¹⁷ See KNF Appeal, pp. 12-13 (Packet, pdf pp. 68-69).

Despite the overwhelming substantial evidence showing the discontinuity of uses, which is acknowledged by the applicant in supporting materials, the grant of the Coastal Development Permit is premised upon the application being in support of “the renovation of an *existing* 1,276 square-foot restaurant...and a basement level theater with 49 seats and to *continue* the *existing* permitted uses.”¹⁸ The grant of a Coastal Development Permit is thus based on the false premise that the proposed uses are existing and continuing, when they are actually new uses. Even setting aside the illegal de facto hotel use, a new restaurant and theater, both proposed to include alcohol service, together represent a significant intensification of the actual use of the property.

The ZA erred and abused his discretion by granting a Coastal Development Permit premised on *continuing* uses when the facts show these are *new* uses that do not conform with the City’s zoning regulations as they must for a CDP to issue.¹⁹

IV. A Categorical Exemption is Not Sufficient Environmental Clearance for the Project.

The ZA approved a Class 1 categorical exemption for the project, pursuant to CEQA Guidelines section 15301. As described in the determination, this exemption “consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of *existing* public or private structures, facilities, mechanical equipment, or topographical features, *involving negligible or no expansion of existing or former use.*”²⁰ The project is not eligible for the exemption, because the proposed uses are not existing. The project description inaccurately describes the new uses as continuing, existing uses.

The determination also fails to note numerous land use conflicts between the project and the City’s zoning code and applicable land use goals and policies of the City’s Housing Element and Venice Community Plan, ignoring that these are cognizable as significant environmental impacts. The ZA ignores that nearby properties contribute to an unanalyzed cumulative impact.²¹

Use of an inapplicable Class 1 categorical exemption here clearly violates CEQA, even without considering the ongoing violation of the City’s Home Sharing Ordinance and Rent Stabilization Ordinance. These conflicts represent significant environmental impacts through land use conflicts that require a higher-level review than an inapplicable categorical exemption.

V. The Findings Are Grossly Inadequate and Not Based on Substantial Evidence.

Findings must “draw legally relevant sub-conclusions supportive of [the] ultimate decision” to “facilitate orderly analysis and minimize the likelihood that the agency will randomly leap from evidence to conclusions.”²² Conclusory recitations are inadequate.²³ KNF’s

¹⁸ ZA Determination, Aug. 8, 2023, p. 43 (Packet, pdf. p. 139) (emphasis added).

¹⁹ See KNF Appeal, discussion of findings, especially conditional use and coastal development permit findings, pp. 11-16, 18-19 (Packet, pdf pp. 67-72, 74-75).

²⁰ ZA Determination, p. 51 (Packet, pdf p. 147).

²¹ See KNF Appeal, pp. 21 (Packet, pdf pp. 77).

²² *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 510, 516.

²³ *City of Carmel-By-The-Sea v. Board of Supervisors* (1977) 71 Cal.App.3d 84, 92.

appeal includes a lengthy analysis of the grossly inadequate findings in the determination of this case and urges the commissioners to carefully review this portion of the appeal record, which demonstrates that findings presented do not meet the minimum legal requirements.²⁴ KNF also agrees with the arguments of appellant Better Neighbors LA:

[T]he Project does not provide an essential or beneficial use to the community because it violates the City's HSO and also removes RSO housing units at a time where the area desperately needs housing. Additionally, the Project is not compatible with adjacent properties because it fails to secure the necessary hotel CUP and other land use approvals to authorize the new use. Furthermore, the Project does not substantially conform with the purpose and intent of applicable land use plans because it fails to preserve existing affordable housing stock intended for long-term housing.²⁵

As noted above, the ZA determination repeatedly ignores substantial evidence of the discontinuity of restaurant and basement theater uses, including evidence submitted by and on behalf of the applicant and repeatedly describes the requested approvals as being in support of existing, continuing uses. The repeated failure to get this fundamental fact correct results in the creation of new non-conforming uses that are not supported by any land use authorization and results in project findings that legally inadequate.

VI. Conclusion.

Based on the above, the entire record of the case, and the arguments and substantial evidence supporting the four appeals in this case, KNF urges the West LA Area Planning Commission to correct the ZA's error and abuse of discretion and grant the appeals.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Given', with a long horizontal flourish extending to the right.

John Given

Encl.

²⁴ KNF Appeal, pp. 11-19 (Packet, pdf. pp. 67-75).

²⁵ Better Neighbors LA Appeal, p. 5 (Packet, pdf p. 17) (citations to LAMC omitted).



US DOLLAR ▾



SELECT YOUR DATES

- 1
- 2
- 3
- 4
- CALENDAR
- ROOM & RATE
SELECTION
- ENHANCEMENTS &
DETAILS
- CONFIRMATION

SELECT YOUR DATES													
MARCH 2024							APRIL 2024						
Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2		1 \$335	2 \$335	3 \$335	4 \$335	5 \$345	6 \$355
							7 \$295	8 \$315	9 \$335	10 \$335	11 \$315	12 \$325	13 \$325
3 \$310	4 \$360	5 \$589	6 \$293	7 \$335	8 \$325	9 \$370	14 \$305	15 \$325	16 \$325	17 \$325	18 \$325	19 \$336	20 \$325
10 \$310	11 \$275	12 \$275	13 \$275	14 \$330	15 \$379	16 \$334	21 \$305	22 \$305	23 \$325	24 \$325	25 \$325	26 \$335	27 \$335
17 \$295	18 \$275	19 \$275	20 \$265	21 \$275	22 \$325	23 \$325	28 \$325	29 \$325	30 \$325				
24 \$305	25 \$305	26 \$305	27 \$325	28 \$335	29 \$385	30 \$325							
31 \$265													

= YOUR STAY

= SOLD OUT

= MIN STAY

MODIFY/CANCEL RESERVATION

ARRIVAL	DEPARTURE

1 ROOM



US DOLLAR ▾



SELECT YOUR ROOM



← EDIT

VENICE V HOTEL

ARRIVE: MONDAY, MARCH 4, 2024 | DEPART: FRIDAY, MARCH 8, 2024

SELECT ROOM FOR

2 ADULTS ▾

0 CHILDREN ▾

PROMO / GROUP CODE

SPECIAL RATES

ADD ANOTHER ROOM +

FILTER

OF BEDS ▾

ROOM TYPE ▾

FEATURES ▾



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Everything you need — our perfectly-sized rooms offer partial ocean views, a custom platform bed, crisp linens, fluffy down pillows, and spacious walk-in showers with Aesop bath amenities.

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hello@venicevhotel.com



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Ocean View rooms offer stunning Pacific Ocean and Venice Beach views, with a custom Queen platform bed, crisp linens, fluffy down pillows, walk-in showers, and Aesop bath amenities.

FROM
\$311.40 / NIGHT
EXCLUDING TAXES & FEES

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Queen Bed



Ocean View



Wet Bar*



Bluetooth Speaker



Imported Linens



Aesop Bath Amenities



Robes



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March 4, 2024

Lisa Waltz Morocco, President
West Los Angeles Area Planning Commission
Attn: Neverly Ann Hill, Commission Executive Assistant, apcwestla@lacity.org

Re: Venice V Hotel, 1217 Ocean Front Walk, Venice, CA, ZA-2021-7223-CUB-CU-CDP-1A

Dear Ms. Morocco and Members,

The Venice Stakeholders Association is a fifteen-year-old non-profit organization, which supports civic improvement and increased quality-of-life and public safety for the residents of Venice, CA.

We support the Zoning Administrator's approval to permit the sale and dispensing of a full-line of alcoholic beverages at the Venice V restaurant and basement theater.

The Venice V Hotel, originally The Waldorf Hotel, first opened in the spring of 1915. It is one of the few remaining historic structures from that era along the Boardwalk. The Waldorf has a storied history; the hotel's ocean views and luxury character attracted the likes of Charlie Chaplin, Fatty Arbuckle, and Clara Bow, all of whom lived at the hotel at some time.

We support the approval of the requested Conditional Use Permit & Coastal Development Permit so that the ground floor may again come alive with a new restaurant, along with the basement theater, bringing renewed energy to the Venice Boardwalk, while serving locals and visitors alike. The ZA's approval will invigorate the historic ground floor and basement spaces, which after the repeal of Prohibition in 1933, previously included the serving of alcoholic beverages, and will help preserve and enhance the fabric of the historic building so it can serve generations of Venetians to come, while creating positive activity and new employment opportunities along the Boardwalk.

Please contact me if I may offer any further reference for this project.

Sincerely yours,

Mark Ryavec

Mark Ryavec, President

The Venice Stakeholders Association is dedicated to civic improvement. The VSA supports slow growth, protection of the limits of the Venice Specific Plan, neighborhood safety, better traffic circulation, increased parking for residents, neighborhood beautification projects, historic preservation, habitat restoration and protection of coastal waters.
www.venicestakeholdersassociation.org/310-392-4843

ZA-2021-CUB-CU-CDP-1A

Proposed Modifications to Findings in Support of the Appeals of Appellants

Citizens Preserving Venice and Keep Neighborhoods First

The below proposed modifications are respectfully submitted to the West LA Area Planning Commission in support of the Appeals of ZA-2021-CUB-CU-CDP made by Citizens Preserving Venice and Keep Neighborhoods First. Page number references throughout this document are those of the ZA Determination in the matter, issued on August 8, 2023, which begins on PDF page 97 of the ZA Commission Packet issued on February 28, 2024 entitled “ZA_Commission_Packet_3.6.24.pdf.”¹

Findings of Fact

Page 12

Add the word “not” to the end of the first paragraph under the heading FINDINGS OF FACT, the revised sentence to read: “I find that the requirements and prerequisites for authorizing a Conditional Use and a Coastal Development Permit as enumerated in Sections 12.27-W.1, 12.27-W.27 and 12.20.2 of the Municipal Code have **not** been established by the following facts:”

Background

Page 12, Paragraph 2

Change “and a theater at the basement level” **to** “and a basement.”

Page 12, Paragraph 3

Change “The applicant proposes to restore the existing restaurant and the theater spaces and provide...” **to** “The applicant proposes to **re-establish** a restaurant and basement theater spaces and provide...”

Page 13 (top), Paragraph 3

Change “to authorize the renovation of an existing 1,276 square-foot restaurant...” **to** “to authorize the renovation of a 1,276 square-foot restaurant...”

Conditional Use Findings

Page 25, Finding 1, Heading

Change “The project will enhance the built environment...” **to** “The project will **not** enhance the built environment...”

¹ Bolded words in the modified findings are meant only to call attention to modified language.

Page 26, Paragraph 2

Delete “A collective of Department of Building and Safety Certificates of Occupancy dated from 1955 through 1969 show the building is an Apartment Hotel with apartment units and guestrooms, a ground floor restaurant, and a theater at the basement level.”

Change “...and a 1969 Certificate of Occupancy shows a portion of the Apartment Hotel building has been converted to a theater” **to** “...and a 1969 Certificate of Occupancy shows a portion of the Apartment Hotel building **was** converted to a theater.”

Page 26, Paragraph 3

Change “The applicant proposes to restore the existing restaurant and the theater spaces...” **to** “The applicant proposes to **re-establish a** restaurant and **basement** theater spaces...”

Page 27, 2nd complete Paragraph

Insert before “However, when City's Home Sharing Ordinance was passed...”:
“Prior to adoption of the City’s Home Sharing Ordinance, a special conditional use permit was required before any residential use could be rented on a short-term basis in a commercial zone with 500 feet of a residential zone.”

Change “However, when City's Home Sharing Ordinance was passed, become effective in 2019, and prohibited short term rentals in non-Hotel/Motel/Transient Occupancy Residential Structure/Bed and Breakfast uses...” **to** “**When the** City's Home Sharing Ordinance was passed **and became** effective in 2019, **it** prohibited short term rentals in non-Hotel/Motel/Transient Occupancy Residential Structure/Bed and Breakfast uses...”

Page 28, Paragraph 3

Add at end of paragraph: “The Commission staff opinion was based on decades-old Certificates of Occupancy and expressed no view whether hotel uses had, in fact, been continuous since the Certificates of Occupancy were first issued.”

Page 29, 1st complete Paragraph

Add at end of paragraph: “LAHD expressed no opinion whether this allowance constituted a correct interpretation of the zoning code or whether short-term rentals had been continuously permitted at the subject property since issuance of the 1967 Certificate of Occupancy.”

Page 29, 2nd complete Paragraph

Add at end of paragraph: “The applicant provided no evidence that any City agency ever opined that the subject property was a TORS as opposed to an Apartment Hotel.”

Pages 30-31

Delete the paragraph beginning at the bottom of p. 30 (beginning “Based on all records presented...” and finishing on p. 31, which the ZA acknowledges are a statement of opinion and thus not fact or law.

Page 31, 1st complete Paragraph

Delete the first two sentences and begin the paragraph at the sentence beginning, “Also, since the property is commercially zoned...”

Change the final sentence from “The residential and hotel units shall be continued to be regulated by the building's Certificate of Occupancy and by LAHD” **to** “The subject property shall continue to be regulated by the zoning code and other applicable law.”

Page 32, Paragraph 1

Retain the first sentence, but **replace the remainder** of the paragraph with: However, the available evidence shows the restaurant and theater have become nonconforming with respecting to certain zoning regulations, and because the evidence also shows they were each discontinued for a significant period the subject property must comply with LAMC section 12.23-B.9, which requires “[a] building or structure or portion of a building or structure, which contains a nonconforming use which is discontinued for a continuous period of one year, shall only be occupied by a use that conforms to the current use regulations of the zone and other applicable current land use regulations.” Pursuant to ZA-2022-7106-ZAI (“Lists of Uses Permitted in Various Zones”), a theater use is not a permitted use in the C1 zone and the requested entitlements do not include the required variance to permit a theater at the subject property, nor has any evidence been submitted in support of the required findings for a variance. Due to the discontinuity of a theater use, re-establishment of a theater would represent a new use. A restaurant is permitted in the C1 zone, but to re-establish a restaurant use the subject property must comply with LAMC section 12.23-B.8, which requires a recalculation of required parking. Therefore, the project will not enhance the built environment in the surrounding neighborhood or provide a service that is essential or beneficial to the community, city or region.

Page 32, Finding 2, Heading

Add the word “not” and **strike** the word “not” so the new heading reads: “The project's location, size, height, operations and other significant features will **not** be compatible with and **will** adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.”

Page 33, Paragraph 1

Change the third sentence from “The applicant/property owner is requesting a Conditional Use and a Coastal Development Permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption in the existing 1,276 square-foot ground floor restaurant and the 706 square-foot basement level theater spaces, with 43 seats in the restaurant and 49 seats in the theater” **to** “The applicant/property owner is requesting a Conditional Use and a Coastal Development Permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption in **a** 1,276 square-foot ground floor restaurant and **a** 706 square-foot basement level theater **space**, with 43 seats in the restaurant and 49 seats in the theater.”

Strike the next to last sentence (“There is no construction, alterations or changes in the use proposed as part of this application.”)

Page 34, 1st complete Paragraph

Change the first sentence from “The renovation of the existing restaurant and theater for continued business at this location will re-enforce the vibrant character of the Venice Boardwalk and serve to strengthen the economic vitality of the community” **to** “The re-establishment of a restaurant for continued business at this location **might** re-enforce the vibrant character of the Venice Boardwalk and serve to strengthen the economic vitality of the community.”

Replace the remainder of the paragraph with: “However, because the restaurant and theater uses were discontinued and the restaurant is nonconforming with respect to parking, and re-establishment of a nonconforming theater use is not permitted without a variance, the project's location, size, height, operations, and other significant features will not be compatible with and will adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, or safety.”

Page 34, Finding 3, Heading

Add the words “does not” and delete the “s” from “conforms” so the heading reads: “The project **does not** substantially conform with the purpose, intent and provisions of the General Plan, the applicable community plan, and any specific plan.”

Page 34, 1st Paragraph under Heading for Finding 3

Delete the final sentence of the first paragraph and the reference and text of Objective 7.3 and Policy 7.3.2 (since the proposed entitlements are not for existing businesses).

Page 35, Paragraph 1

Delete the 2nd sentence and **replace** the remainder of the paragraph with: “The requested Conditional Use and Coastal Development Permit for the sales and dispensing of on-site alcoholic service and consumption is NOT consistent with the following Policies of the Venice Community Plan in Commercially Zoned properties:”

Delete reference and text of Goal 2, Objective 2-1, and Policy 2-1.2.

Retain Policy 2-1.5.

Delete reference and text of Objective 2-2 and Policy 2-2.1.

Retain Policy 2-2.3.

Add reference and text of Goal 13 (“A sufficient system of well designed and convenient on-street parking and off-street parking facilities throughout the plan area”) and Objective 13-1 (“To provide an adequate supply of parking at appropriate locations in accordance with Citywide standards and community needs”).

Page 35, Paragraph 2

Strike the words “continued” and “and a theater” from the sixth sentence.

Change the final sentence from “The project substantially conforms and compiles with the LUP Policies and Coastal Guidelines as demonstrated by the following policies:” **to** “The project does not substantially conform with the LUP Policies and Coastal Guidelines and does not comply with the following policies:”

Page 36

Strike the entirety of the page, and **replace with:**

Policy I. A. 5. Preserve and Protect Stable Multi-Family Neighborhoods.

Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents’ quality of life can be maintained and improved.

Policy I. A. 9. Replacement of Affordable Housing. Per the provisions of Section 65590 of the State Government Code, referred to as the “Mello Act”, the conversion or demolition of existing residential units occupied by persons and families of low or moderate income shall not be permitted unless provisions have been made for replacement of those dwelling units which result in no net loss of affordable housing in the Venice Community in accordance with Section 65590 of the State Government Code (Mello Act).

Policy I. A. 16. Exceptions. No exceptions to the replacement housing policies of this LUP shall be permitted within the Venice Coastal Zone except as permitted by Section 65590 of the State Government Code (Mello Act).

Policy I. E. 5. Nonconforming Structures. Where extensive renovation of and/or major addition to a structure is proposed and the affected structure is nonconforming or there is another nonconforming structure on the site, or a project is proposed that would greatly extend the life of a nonconforming structure or that eliminates the need for the nonconformity, the following shall apply:

Unless the City finds that it is not feasible to do so, the project must result in bringing the nonconforming structure into compliance with the current standards of the certified LCP, unless in its nonconformity it achieves a goal associated with community character (i.e. the reuse and renovation of a historic structure) or affordable housing that could not be achieved if the structure conforms to the current standards of the certified LCP.

Page 37, Paragraph 1

Change the first sentence from “The project is the renovation of an existing ground floor restaurant and a basement level theater in conjunction with the sales and dispensing of a full line of alcoholic beverages within the historic Waldorf Building” **to** “The project is the **re-establishment of a ground floor restaurant and a basement level theater** in conjunction with the sales and dispensing of a full line of alcoholic beverages within the historic Waldorf Building.”

Change the fourth sentence from “The property is zoned C1-1 and a restaurant use and a theater is a permitted use within this zone” **to** “The property is zoned C1-1. A restaurant use is permitted within this zone, but a theater is not. The re-establishment of the restaurant use requires conformance with currently applicable zoning regulations under LAMC section 12.23-B.9, including parking (see LAMC 12.23-B.8).”

Change the final sentence from “The Findings made herein are in support of that approval” to “The Findings made herein **do not** support that approval.”

Page 37, Paragraph 2

Strike the entirety of the paragraph and **replace with**:

“The project is not consistent with the General Plan, the Venice Community Plan, or the Venice Local Coastal LUP. This case is considered a project under the Venice Specific Plan since there is a proposed expansion of use in the re-establishment of a discontinued and nonconforming basement theater. A basement theater, if permitted in the zone, would arguably be consistent with numerous General Plan, Venice Community Plan, and Venice Local Coastal LUP Goals, Objectives, and Policies, but a nonconforming basement theater that has been discontinued is not, and must be construed as an expansion in floor area and an increased intensity of the use. Therefore, the project does not substantially conform with the purpose, intent and provisions of the General Plan, the Venice Community Plan, and Venice Local Coastal Specific Plan.”

Alcoholic Beverage Findings

Page 39, Finding 5, Heading

Change the first clause of the first sentence from “The granting of the application will not result in an undue concentration...” **to** “The granting of the application **will** result in an undue concentration...”

Strike the first sentence of the final paragraph (starting with “Although the crime report...”)

Page 40, 1st complete Paragraph

Strike the paragraph

Page 40, 2nd and 3rd complete Paragraphs

Strike both paragraphs, and replace with:

“The above statistics indicate that the crime rate in the census tract where the subject site is located is higher than the city average. In addition, the California Department of Alcoholic Beverage Control licensing criteria provides that one (1) on-site and zero (0) off-site consumption licenses should be allocated to the subject census tract, and there are already 4 (four) onsite licenses and 2 (two) off-site licenses in this census tract, showing an existing undue concentration of licenses. Adding an additional onsite license would increase the existing undue concentration.”

Mini-Shopping Center/Commercial Corner Findings

Page 42, Finding 7, Heading

Change first clause from “Based on data provided by the Department of Transportation or a licensed traffic engineer, ingress to...” **to** “**No data was** provided by the Department of Transportation or a licensed traffic engineer **that** ingress to ...”

Page 42, 1st paragraph following Heading for Finding 7

Add sentence to end of paragraph (or new paragraph): “However, the project proposes to re-establish a restaurant that is nonconforming as to parking, and to re-establish a non-conforming basement theater that is no longer permitted in the zone. The re-establishment of these nonconforming uses requires additional parking to be provided in order to conform to the current zoning code. Since no data has been provided by the Department of Transportation or a licensed traffic engineer to not only provide for this parking but to show that ingress to or egress from new parking sites will not constitute a traffic hazard or cause significant traffic congestion or disruption of vehicular circulation on adjacent streets, this finding cannot be met.”

Page 42, 1st paragraph following heading 8

Strike the words “new construction of” from the next to last sentence, the revised sentence to read: “There will be no creation of a new mini-shopping center or commercial corner development.”

Coastal Development Permit

Page 42, Finding 9, Heading

Change the heading to: “The development is **not** in conformity with Chapter 3 of the California Coastal Act of 1976.”

Page 43, paragraph 2 and 3

Strike both paragraphs regarding Section 30244 Archaeological and Paleontological Resources, as inapplicable.

Page 43, paragraph 5

Change the first sentence from “The proposed project includes the renovation of an existing 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a basement level theater with 49 seats” **to** “The proposed project **proposes to re-establish a** 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a **nonconforming** basement level theater with 49 seats.”

Strike final sentence and replace with: “The restaurant is nonconforming with respect to parking and the proposed basement theater is nonconforming and no longer permitted in the zone. Both would require additional parking under the local zoning code, which has not been provided for.”

Page 44, 1st complete Paragraph

Change the third sentence from “The proposed project includes the renovation of an existing 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a basement level theater with 49 seats” **to** “The proposed project **proposes to re-establish** a 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a **nonconforming** basement level theater with 49 seats.”

Page 44, 1st paragraph under paragraph regarding Section 30252 requirements

Strike the existing paragraph and replace with:

“The proposed project proposes to re-establish a 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a nonconforming basement level theater with 49 seats. While the proposed restaurant and theater uses are limited to the subject site, where no permanent structures would be placed within the public right-of-way and public access to the coast would not be impacted, both uses are nonconforming with respect to required parking. Public access to the coast will be affected by the proposed project in that the proposed project does not provide adequate parking facilities or provide a substitute means of serving the development with public transportation, as required by Section 30252 of the Coastal Act.”

Page 45, 3rd complete Paragraph

Change the third sentence from “The proposed project does not include any basement areas or any new construction” **to** “The proposed project includes a nonconforming basement theater.”

Pages 45-46, Paragraph straddling pp. 45-46

Strike the paragraph and replace with:

“The re-establishment of a permitted but nonconforming restaurant and non-permitted nonconforming theater would have adverse impacts on public access, as the required additional parking for the intensification of use has not been provided. In other respects, the project would not interfere nor reduce access to the shoreline or beach. There will be no dredging, filling or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed dwelling will not block any designated public access views. Due to the nonconforming uses and failure to provide adequate parking, the proposed project is not in conformity with Chapter 3 of the California Coastal Act.”

Page 46, 2nd Paragraph under finding 10

Strike the sub-paragraph beginning “Policy I.B.6 Community Commercial Land Use...” and all subsequent text up to and including the first paragraph on p. 48.

Page 48

Retain the second paragraph on p. 48 beginning “Policy II.A.3 Parking Requirements...”

Strike the third paragraph beginning “The proposed project includes...” and replace with:

“As described in finding 9, due to the nonconforming uses and failure to provide adequate parking, the proposed project is not in conformity with Chapter 3 of the California Coastal Act, and therefore this finding cannot be met.”

Page 49, Paragraph 1

Strike the paragraph and replace with:

“The Regional Interpretive Guidelines have been reviewed and the proposed project is consistent with the requirements for the North Venice Subarea; however, the project does not comply with the policies of the LUP and other applicable provisions of the Specific Plan as described in finding 3. As such, the proposed project, as conditioned, is not consistent with the Regional Interpretive Guidelines.”

Page 49, 2nd Paragraph following finding 12

Change the first sentence from “The proposed project includes the renovation of an existing 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a basement level theater with 49 seats and to re-establish the existing permitted uses” **to** “The proposed project **proposes to re-establish** a 1,276 square-foot restaurant with 896 square feet of Service Floor Area and 43 seats and a **nonconforming** basement level theater with 49 seats.”

Page 50, Finding 13, Heading

Change the second clause from “and the development is in conformity with the public access...” **to** “and the development is **not** in conformity with the public access...”

Page 50, final Paragraph

Add the following paragraph to the end of this finding:

“However, Section 30252 requires that projects provide adequate parking facilities or provide substitute means of serving the development with public transportation. The re-establishment of a restaurant nonconforming as to parking and the re-establishment of a nonconforming basement theater require the provision of additional parking pursuant to the zoning code and applicable LUP (see Policy II.A.3. Parking Requirements). Thus the proposed project is not in conformity with the public access policies of Chapter 3 of the California Coastal Act.”

Page 51, Finding 14, Heading

Change from “An appropriate environmental clearance under the California Environmental Quality Act has been granted” **to** “An appropriate environmental clearance under the California Environmental Quality Act has **not** been granted.”

Pages 51-52, text following the heading

Strike the entire text of Finding 14, and replace with:

A Categorical Exemption, ENV-2021-7224-CE, has been prepared for the proposed project as required by the provisions of the California Environmental Quality Act and the City CEQA Guidelines. The proposed project is the re-establishment of a 1,276 square-foot restaurant space with 896 square-feet of Service Floor Area and 43 seats nonconforming as to parking, and the re-establishment of a nonconforming basement level theater space with 49 seats, as the permitted uses for the sale and dispensing of a full line of alcoholic beverages for on-site consumption with hours of operations limited to 8:00 a.m. to 2:00 a.m. daily. Proposed project conditions would limit the hours of

operation to 8 a.m. to 12 a.m., midnight from Sunday to Wednesday, and from 8:00 a.m. to 1:00 a.m. on Thursday, Friday, and Saturday.

The Class 1 Categorical Exemption consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The key consideration is whether the project involves negligible or no expansion of use. Because the proposed re-establishment of the restaurant use is nonconforming with respect to parking, and especially because the proposed re-establishment of a theater use is entirely nonconforming and requires an additional entitlement to be permitted in the zone as well as requiring conforming parking, the project can be seen to involve a significant expansion of use and does not qualify for a Class 1 exemption.

The California Environmental Quality Act requires that a decisionmaker consider the project to be the whole of the action. Here, even if there is no significant construction contemplated as part of the proposed project at the subject site, there is an additional project component requiring the provision of additional parking to remove a non-conformity as required by both the zoning code and Venice Coastal LUP. Moreover, where a project conflicts with local land use provisions such as the zoning code and Venice Coastal LUP, which this does not only because of the parking non-conformity but because a theater use is not permitted in the zone of the subject property, there exists a fair argument of a potentially significant environmental impact, which requires something more than a categorical exemption as an environmental clearance.

The Categorical Exemption prepared for the proposed project is not appropriate pursuant to CEQA Guidelines, Section 15301 (Class 1).

In addition, because the project must be considered the whole of an action, even though the present application does not contemplate consideration of how the residential spaces above the ground floor at the project site are used, it is evident that the proposed project represents the unified development of a hotel project (the Venice V Hotel), as described in application and supporting materials for the present application and a previous application (ZA-2020-1541-CUB-CU-CDP). To avoid conflict with the California Environmental Quality Act's prohibition on project "piecemealing," future consideration of an environmental review clearance for the proposed project should address the entirety of the project, and not break the project into individual components which may have a tendency to reduce the appearance of potentially significant effects on the environment.

DAY OF HEARING SUBMISSIONS

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AREA PLANNING COMMISSION

Cafe Yields to Evolution--Venice Style

BY ALLAN PARACHINI
JUNE 24, 1985 12 AM PT

TIMES STAFF WRITER

FILE COPY

It was business as usual over the weekend at the Lafayette Cafe, one of the few remaining bits on the Venice boardwalk of a more substantive, colorful past.

But not for long. The cafe is a victim of Venice's honky-tonk carnival present.

The Lafayette--first opened 25 years ago on the ground floor of a landmark building that has been the residence of celebrities ranging from comedian Charlie Chaplin to rock star Jim Morrison--has only a week left to survive.

It will close Sunday--the day after the 51st birthday of its owner, Arturo Garcia--the victim and symbol of a now-familiar melding of economic and social pressures.

The Lafayette, one of the few low-priced eateries in Venice catering to a predominantly local clientele, could not afford the near tripling of its rent proposed by George Lenney, owner of the Waldorf at Ocean Front Walk and Westminster Court that has housed the Lafayette since it first opened in about 1960.

Sitting at a table at the back of the Lafayette dining room, Garcia, a soft-spoken man with more than 30 years' experience in the restaurant business, said he isn't the kind of person inclined to protest. He said he has rejected more activist suggestions by longtime Lafayette customers, including one attorney who proposed ways to keep the place open for at least "You cannot blame him," Garcia said of his landlord. "There is probably no way a coffee shop like ours, with our prices (hamburgers are \$1.60, roast beef sandwiches \$2.40 and, at breakfast time, three eggs are served for the price of two) is going to make it in Venice today.

The Garcias, their landlord (Lenney bought the building in the 1960s, still lives in it part time and is widely perceived as a conscientious, concerned property owner) and longtime Venice locals don't like things that way. But, as Nancy McCulloch, a local resident who has been stopping for coffee and food at the Lafayette for 22 years, put it: "All of the old places get wiped out. Local artists used to sell here, but not anymore. Venice has its own evolution. What's happening to us (local people) right now is that we're getting wiped out.

McCulloch remembers the Lafayette when it first opened, as a bar with a small restaurant operation attached, in the early 1960s. The Garcias bought the establishment in 1969, taking it over from a man everyone remembers only as Ted. It was officially known as the Lafayette Coffee Shop in those days, but, two years ago, the sign blew down in a storm and the Garcias capitulated to the name by which the place had always been informally known, Lafayette Cafe.

And so the Lafayette will close. Signs in the windows offer its kitchen equipment for sale and the brothers have posted neatly typed notices thanking their customers for years of loyal patronage.

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is a grassroots coalition of neighbors, tenants, and affordable housing advocates, working men and women, and business and hotel owners who have come together to solve the problems created by the proliferation of commercial short-term rentals in our neighborhoods

We are concerned about:

- **The rapid loss of affordable housing**
- **Safety and stability of our neighborhoods**
- **The diminishing quality of life for Angelenos**
- **Homes and apartments turning into hotels**
- **Entire neighborhoods becoming tourist zones**

KNF has successfully brought together thousands of stakeholders all over Los Angeles and throughout California to create a united voice to protect our communities from the impacts of short-term rentals. Together we have already helped shape the legislative process at City Hall, forcing a real conversation. We have mobilized speakers, held rallies, marches against bad operators, and demanded action. KNF is proud of the role we are playing in developing the regulations at City Hall to ensure real protection in our neighborhoods.

While we support legitimate home-sharing, we aim to bring relief to community members who are concerned, ignored, evicted, and deceived by commercialized short-term rental abuse, and who are ready to stop being exploited. We offer useful information, develop short-term rental awareness campaigns, and highlight opportunities to take action.

Item 5

The Los Angeles City Attorney's office has canceled valid ACE citations issued to address violations of the Home Sharing Ordinance against a serial violator. The decision is shameful and outrageous.

- The City Attorney's decision is *contrary to advice* from the Los Angeles City Planning Department and the Los Angeles Housing Department that the citations were valid and should be upheld.
- The City Attorney provides *NO reasoning to support her decision*.
- The public had *NO notice of the decision* until months after the fact, even though members of the public have *repeatedly* requested information about the status of the citations.
- There was *NO opportunity for members of the public to be heard*.
- There was *NO opportunity to provide evidence* in support of the complaints before the citations were canceled.
- If the City Attorney refuses to prosecute strong HSO cases, the City Council must address this failure by incorporating a private right of action into the Home Sharing Ordinance.



Office of the Los Angeles City Attorney
Public Relations Staff

**NOTICE OF CANCELLED CITATIONS
ADMINISTRATIVE CITATION ENFORCEMENT PROGRAM**

Mailing Date: November 15, 2023

Jeffrey T. Harlan
Variable LLP
2040 Century Park East
Suite 2300
Los Angeles, CA 90067

Citation Numbers: HSHCD0114379 and HSHCD0200363
Los Angeles Municipal Code Violation Section: 12.22A(2)(d)(2)

Dear Jeffrey T. Harlan:

Citation HSHCD0114379 and Citation HSHCD0200363 have been cancelled. Regarding Citation HSHCD0114379 a refund in the amount of \$500.00 will be issued. Regarding Citation HSHCD0200363 a refund in the amount of \$4,000.00 will be issued.

No further action is required on your part.

Thank you.

**RECEIVED
CITY OF LOS ANGELES**

Mar 06 2024

**CITY PLANNING DEPT.
AREA PLANNING COMMISSION**

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MAR 06 2024

WLAARC
CITY PLANNING DEPT
AREA PLANNING COMMISSION
CDP-1A

WLAARC hearing March 6, Item 5, ZA-2021-7223-CUB-CU-

It's critical that you ask the City Attorney these specific questions:

This application is requesting a CUB in conjunction with the reinstatement of restaurant and theater uses, which relates to the entire building and the property, which is one unified development, and which includes a de facto hotel. Did the ZA err in his logic when he said on page 31 that whether units located at above floors are apartments or hotel units is irrelevant to the validity of the subject conditional use for alcohol service? [The answer is yes.]

The City has a practice of saying if a use is on a C of O that it is considered "existing," even if the use has been discontinued for decades. But that only works when there is no discretionary permit and therefore no CEQA at play. Do CEQA and the Coastal Act, both of which are applicable here, allow a determination to be based on former, long gone uses or do they require analysis of existing uses? Do you agree that the project can only be exempt under CEQA if the restaurant and theater are actual existing uses? [The answer is yes.]

Do the coastal regulations require that other changes of use on the property that have not been permitted, in this case conversion of apartment units to hotel rooms by removing long-term tenants and removing kitchens and operating the building as a hotel, be considered in the Coastal Development Permit, and this cannot be piecemealed? [The answer is yes.]

If substantial evidence shows that the restaurant and theater uses were discontinued for decades, to reinstate them is it required to conform to the current laws? [The answer is yes.]

Do they need to get a Zone Variance for the theater as the use was discontinued for decades and it's not an allowed use in the zone? [The answer is yes.] If so, do the facts of this case meet the findings for that? [The answer is no.]

On page 30, the ZA opines that the property owner cannot conduct a transient use until the RSO exemption for the non-apartment dwelling units is approved by the Los Angeles Housing Department (LAHD). Did the ZA err by failing to reflect this in the conditions of the determination? [The answer is yes.] Is there an RSO exemption available for what this applicant wants to do here, to change from long term apartment use to hotel rooms?

Is the Waldorf building in violation of the Home Sharing Ordinance? [Yes.] Was the ZA in error in not factoring that into his decision? [Yes.]

Please ask the City Attorney to report out on the status of the Home Sharing Ordinance violations for this property.

Given the ZA did not specify in Condition 10 that the theater must also be maintained as a bona fide eating place (restaurant), does that mean the theater must be properly classified as a bar? [The answer is yes.]

Does the Mello Act allow a conversion from long-term residential apartment housing dwelling units to commercial hotel rooms in conjunction with other commercial uses? [No.] Is a Mello Act Compliance Determination required for this conversion of dwelling units? [The answer is yes.]

Given the ZA failed to prohibit live entertainment, including patron dancing, live music, Disc Jockey, jukebox and karaoke nights in Condition 19, does it mean that these activities are allowed and thus could detrimentally affect nearby residentially zoned communities in the area due to the close proximity of residential buildings (Finding 6, page 40)? [The answer is yes.]

Did the ZA err in not requiring a Venice Coastal Zone Specific Plan (VCZSP) review? (Note that a VCZSP review is required wherever a CDP is required. The ZA states that a VCZSP determination is not required because the project does not meet the definition of “development” in the VCZSP (page 37). However, a CDP is required based on the definition of development in the Coastal Act, which is essentially the same as the definition of development in the VCZSP.) [The answer is yes.]

Please ask the owner these two questions:

1. You mention the recent restoration, repairs and upgrades. Did you take the full kitchens out of the prior apartment dwelling units and if so for how many units? What was the reason for that? What are the proper permits for that change of use?
2. Why didn't you buy a property that has an existing commercial use and build a hotel rather than converting long term affordable housing into a hotel?

Thank you, Robin Rudisill, Citizens Preserving Venice

1152 WILSHIRE BOULEVARD
SANTA MONICA, CALIFORNIA 90403
TEL: (310) 828-5700
FAX: (310) 828-8494

GENERAL
REAL ESTATE
MANAGEMENT

September 14, 2021

Support for the Alcohol permit for the Venice V Hotel

We support the Venice V Hotel's entitlement requests to permit the sale and dispensing of a full-line of alcoholic beverages in conjunction with the re-establishment of the ground floor restaurant and basement theater at the historic hotel property (ZA-2020-1541-CUB-CU).

Our organization supports the approval of the requested Conditional Use Permit & Coastal Development Permit for the proposed project so that the ground floor may come alive with a new restaurant along with the basement theater, bringing energy to the Venice beach front and serving locals and visitors alike.

The proposed project to reactivate the historic ground floor and basement uses will help preserve and enhance the fabric of the historic building so it can serve generations of Venetians to come while creating positive activity along Ocean Front Walk in the heart of Venice.

Sincerely,



Print Name: Ann Evere



Planning APC West LA <apcwestla@lacity.org>

Conditional Use Permit & Coastal Development Permit CASE # : (ZA-2020-1541-CUB-CU)

Brennan Lindner <brennan@genericevents.com>

Wed, Mar 6, 2024 at 2:54 PM

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

Greetings commissioners,

I am a longtime resident of Venice (25 years), raised my kids here, served on the Venice Neighborhood Council and currently Vice President of the Chamber of Commerce.

Please approve the requested Conditional Use Permit & Coastal Development Permit CASE # : (ZA-2020-1541-CUB-CU) for sale and dispensing of a full line of alcoholic beverages.

Venice and the Boardwalk need such improvements. Equally as important, the owner of the building is an even longer resident of Venice, and still active in the community, supporting many philanthropic activities.

Do not fall to the pressure of a small minority that continues to attempt to stop anything good happening here in Venice.

Brennan Lindner

brennan@genericevents.com

www.genericevents.com

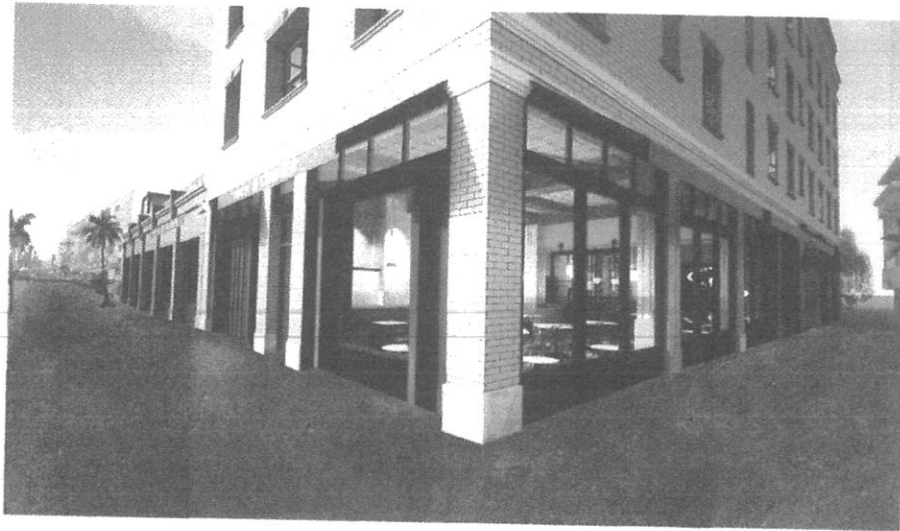
Generic Events

310.821.7898 office

310.570.9501 cell

Generic LLC dba Generic Events

VENICE WALDORF HOTEL FACT SHEET



The project will breathe new life into the historic Waldorf Hotel on Ocean Front Walk in the heart of Venice. The five-story Waldorf Hotel, which first opened in the spring of 1915, is a focal point of old town Venice. The Waldorf has a storied history; the hotel breathtaking views and luxury character attracted the likes of Charlie Chaplin, Fatty Arbuckle, and Clara Bow all of whom lived at the hotel. With approval of the project, the ground floor will come alive with a new restaurant, bring energy to the Venice beach front, while the renovated hotel will serve visitors and locals seeking a getaway alike. The property's history will shine through the project, creating an authentic and vibrant establishment and experience.

What we are requesting:

- Conditional Use Permit approval for the sale and service of a full-line of alcoholic beverages for a ground-floor restaurant and hotel service areas, a basement theater with 49 seats, and a small rooftop patio.
- Coastal Development Permit Approval to reestablish the building's original permitted uses.

I LIVE AT 20
WESTMINSTER
FOR 20+ YEARS
AND SUPPORT
THE CUP FOR
WESTMINSTER



Brian D. Myhr



Planning APC West LA <apcwestla@lacity.org>

Conditional Use Permit and Coastal Development Permit Case ZA-2021-CUB-CU-CDP-1A

C.C. de Vere <losfrangeles@gmail.com>

Tue, Mar 5, 2024 at 7:41 PM

To: ira.brown@lacity.org, apcwestla@lacity.org

To Those It May Concern,

My family's history on the Westside goes back four generations (in fact, my great-grandmother had a boarding house just a few blocks from the senior center where the hearing is taking place). In my lifetime, I have seen Venice's fortunes rise and fall.

I am shocked, dismayed, and disgusted that the rent-stabilized Waldorf Hotel was converted from an apartment-hotel to the "Venice V" tourist hotel, with the long-term RSO tenants displaced and apparently zero consequences for the owner. How is that anything but a brazen violation of the Home Sharing Ordinance?

So far, at least 279 RSO buildings with nearly 1400 affordable units have been taken off the rental market in Venice. Countless short-term rentals (many with "long term" options) have made Venice less and less affordable to the people who actually live there - and we wonder why so many people have taken up residence in vehicles or on the streets?

This is NOT the time to reward those who take away desperately needed RSO housing for financial gain. The city has a moral duty to deny the Conditional Use Permit and ensure that the Waldorf's 36 RSO units go right back on the residential rental market where they belong.

Tourists have countless hotel options (Los Angeles has over 1,000 hotels and over 100,000 hotel rooms). Low-income renters have a shrinking number of affordable buildings in which to live. We all love a cool boutique hotel, but they should NEVER exist at the expense of Angelenos.

Do the right thing and put Venice residents first.

C.C. de V.



Citizens for a Better Los Angeles

March 5, 2024

West Los Angeles Area Planning Commission
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012

Re: 1217 Ocean Front Walk
Case Numbers: ZA-2021-7223-CUB-CU-CDP-1A; ENV-2021-7224-CE
Letter in Support of Appeals

Dear Members of the West Los Angeles Area Planning Commission,

Citizens for a Better Los Angeles is writing to voice our strong opposition the request for a conditional use permit to serve alcohol at 1217 S. Ocean Front Walk. The request is completely inappropriate, as ZIMAS indicates that the location in question is a residential use covered by the Rent Stabilization Ordinance. The owner has illegally converted the existing units to hotel rooms. While the owner claims that previously issued COOs were for other uses, ZIMAS shows that the property is subject to the RSO.

There is evidence in the record showing that this property has been the subject of numerous complaints, and that the applicant has received a citation from the City for violating the Home Sharing Ordinance. Since the Mayor and every member of the City Council have repeatedly told us that LA is experiencing a housing crisis, it is hard to understand how the City continues to allow this illegal conversion of RSO units to hotel rooms.

Not only should City Planning deny all requested entitlements, it should also immediately begin an investigation into the circumstances that have allowed the applicant to continue to profit from this illegal conversion.

We ask that the Commission support the appeals and reject the requested entitlements.

Thank you for your time.

Sincerely,
Casey Maddren
Citizens for a Better Los Angeles

March 4th, 2024

Re. 1217 Ocean Front Walk & 5 Westminster -- The Waldorf
ZA-2021-CUB-CU-CDP-1A

STRONGLY OPPOSE

Dear Area Planning Commissioners:

This applicant has a long and ugly pattern and practice of removing affordable housing from our housing supply, converting building after building from RSO apartments to short term rentals or self-proclaimed "hotels," and securing non-disclosure agreements from departing tenants to cover his tracks. This has cost us over 150 rent-stabilized residential units.

Although these buildings lack the necessary safety standards for hotel certification, he openly lists them on multiple booking services and seems to live a charmed life outside the realm of code enforcement. Perhaps this has been aided by his acumen as a realtor and attorney (and tax expert), or by his status as emeritus president of the Venice Chamber of Commerce. Relationships he's carried with local politicians certainly haven't hurt, either.

Lambert seems to live by the old saying that "It's easier to ask forgiveness than to get permission." A crucial part of his pattern & practice is to slowly bring his buildings into compliance with the rules for a use he's already been engaging in for years. That way, he can present himself as simply trying to bring the building into compliance, and who would argue with that? Certainly not our City, which pretends not to realize the applicant's aim all along was to game the system.

No one is more practiced and skillful at this than this applicant, who has been advertising 1217 OFW and other properties as hotels when they were just apartment buildings in illegal use as short term rentals and lacked the safety features and other requirements to operate as hotels. Lambert never let that slow him down. He waged a relentless campaign to move the rent-stabilized tenants out. If the noise and disruption of rehab work helped persuade tenants to take his keys-for-cash buyouts or similar deals under non-disclosure agreements, so much the better.

Now he's trying to claim grandfathered rights using arcane and erroneous legal arguments that at best belong in a courtroom, not an APC hearing, so that he can have liquor pretty much throughout the building and even on top of it, as well as a movie theater in the basement, but without the required parking, and in a zone that doesn't allow it.

Please apply the rules as they exist. It is your job not to be bamboozled.

Yours truly,
David Ewing
Venice

March 4, 2024

West L.A. Area Planning Commission
Re: ZA-2021-CUB-CU-CDP-IA

Dear Commissioners:

I am writing to oppose the granting of a Coastal Development permit to allow a theater and restaurant and a Conditional Use Permit to allow alcohol service at 1217 Ocean Front Walk in Venice. The use of this property as a rent-controlled apartment building has long been established, and the owners should not be allowed to continue their ongoing attempts to convert it into a boutique hotel. As a Venice resident for more than 40 years who has worked as an advocate for affordable housing, I've had a closeup look at the dire need to preserve such housing for working people and families in the community. In setting its housing priorities, the city should give precedence to the needs of the people who work in our restaurants and stores, teach our children, and generally go about the task of keeping our community functioning, rather than catering to tourists seeking to spend a night or two at an oceanfront hotel.

I'm the author of the book, "The Battle of Lincoln Place: An Epic Fight by Tenants to Save Their Homes," which is an account of the long struggle to preserve Lincoln Place Apartments, the largest apartment complex in Venice and one of the largest affordable housing complexes in the city. In my research, I learned of the desperation people feel when facing the loss of housing and the extreme difficulty in finding rentals they can afford. I learned of the financial and psychological toll such displacement takes on families and individuals, and I strongly urge the city to take a stand on behalf of such people and reject the idea that a property owner such as the one at 1217 Ocean Front Walk can wipe out 36 rent-controlled units in a quest for greater profit.

Sincerely,

Dennis Hathaway
1072 Palms Blvd.
Venice, CA 90291



Planning APC West LA <apcwestla@lacity.org>

Opposition to Conditional Use Permit & Coastal Development Permit (CASE #: ZA-2021-CUB-CU-CDP-1A)

Eugenia Rukhin <erukhin@gmail.com>

Tue, Mar 5, 2024 at 8:12 AM

To: apcwestla@lacity.org

Cc: keepneighborhoodsfirst@gmail.com

Dear APC,

I am writing to express my strong opposition to the requested Conditional Use Permit (CUB) and Coastal Development Permit (CASE #: ZA-2021-CUB-CU-CDP-1A) for the sale and dispensing of alcoholic beverages at the Waldorf property in West Los Angeles.

The proposed conversion of Rent Stabilized (RSO) housing into a commercial property represents a threat to our community's fabric and exacerbates the already dire housing crisis in our city. The Waldorf, once home to a diverse and vibrant community of long-term RSO tenants, has been unlawfully transformed into the "Venice V Hotel," displacing residents in the process.

I urge the West LA Planning Commission to deny all requested entitlements and to thoroughly investigate the circumstances surrounding this illegal conversion. The Rent Stabilization Ordinance and the Home-Sharing Ordinance must be upheld to protect the rights of tenants and ensure the preservation of affordable housing in our neighborhoods.

Please consider this email as my formal opposition to the requested permits. I implore you to prioritize the interests of our community over the profit-seeking motives of the property owner.

Thank you for your attention to this matter.

Sincerely,

Eugenia Rukhin
Resident of Palms

Carl Lambert

From: Frank Lutz <frankalutz@gmail.com>
Sent: Tuesday, September 28, 2021 4:52 PM
To: Carl Lambert
Subject: Letter.

Frank Lutz
P. O. Box 1078
Venice, CA. 90294 – USA
frankalutz@gmail.com
(310)396-9342

September 15, 2021

To Whom it may Concern:

I support Carl Lambert's master plan for renovation and improvement of the Waldorf Hotel and its commercial spaces, including the bar with liquor license, restaurant, and theatre. I am a 53-year resident of Venice, having lived on both Wavecrest at Speedway, and presently in 14 Westminster at Speedway, so "I've seen it all". I have been a property owner and manager, as well as a resident here in Venice.

I am very familiar with the finer details of Lambert's plans for the Waldorf, and for the adjacent outdoor areas. He typically does a superb job of restoring old buildings. and has done so with the Waldorf. I can remember when the electric, plumbing, and elevator in the old Waldorf all presented safety problems and insufficient service to tenants. That all has been cured now. Lambert is familiar with the local problems we have here at Speedway at Westminster, and is determined to create a safe and tranquil environment with his renovation concept. In addition, many people don't know that Lambert has accommodated the desire of some long-term tenants to return to the Waldorf since its completion, and at their former rental amount. So I support his effort, as already he has helped to improve the atmosphere here locally.

Sincerely yours,

Frank Lutz.



Planning APC West LA <apcwestla@lacity.org>

ZA-2021-CUB-CU-CDP-1A - Support the appeals

Judy Branfman <branfman@ucla.edu>
To: Ira.Brown@lacity.org, apcwestla@lacity.org

Tue, Mar 5, 2024 at 4:50 PM

Dear West LA Area Planning Commission,

I am writing to ask that you support the four appeals and deny approval of the requested Conditional Use Permit & Coastal Development Permit in case # ZA-2021-CUB-CU-CDP-1A.

This case is only minimally about movies and liquor – it is really about formalizing the illegal taking of 36 affordable rent-stabilized apartments on Ocean Front Walk in Venice so that one developer can make a fortune converting them to short term rentals and hotel rooms.

These are 36 of at least 200 affordable rent-stabilized units illegally removed from the market in the same way along Ocean Front Walk or adjacent – in buildings with eight to fifty-plus units, several of them owned by the same developer/owner Carl Lambert. This case will set a precedent for his other properties nearby – and all the other people who think owning a building gives them the right to do whatever they please, knowing that Juliet Oh and the city will go right along. This has got to stop.

The Waldorf was a community of lower-income tenants for many decades – my great-aunt lived there in the 1950s as a retired garment worker.

Over 1800 units of affordable RSO units have been lost in Venice through the use of the Ellis Act because the city has not enforced it's guidelines. Many hundreds more tenants have been harassed out of affordable RSO units in Venice, including in many of the same buildings referred to above, along OFW and adjacent. We have a crises of homelessness precisely because the city of LA has allowed this to happen. We need you to do the right thing, no matter how difficult it may seem, and make sure this building, along with others along OFW and throughout Venice, are not allowed to be taken off the affordable RSO market illegally for any reason or no matter who it may benefit.

Thank you,

Judy Branfman

Judy Branfman

[Where Has All The \(affordable\) Housing Gone](#)

branfman@ucla.edu

310-392-2076

September 2021

Support for the Alcohol permit for the Venice V Hotel

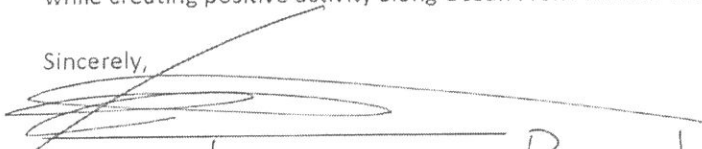
We support the Venice V Hotel's entitlement requests to permit the sale and dispensing of a full-line of alcoholic beverages in conjunction with the re-establishment of the ground floor restaurant and basement theater at the historic hotel property (ZA-2020-1541-CUB-CU).

Our organization supports the approval of the requested Conditional Use Permit & Coastal Development Permit for the proposed project so that the ground floor may come alive with a new restaurant along with the basement theater, bringing energy to the Venice beach front and serving locals and visitors alike.

The proposed project to reactivate the historic ground floor and basement uses will help preserve and enhance the fabric of the historic building so it can serve generations of Venetians to come while creating positive activity along Ocean Front Walk in the heart of Venice.

Sincerely,

Print Name:


Joanna Burke Art Consultants.

THIS IS AN EXCITING PROJECT,
THE BOARDWALK NEEDS THIS
LEVEL OF CULTURE AND
AMENITIES. POST COVID IT
WILL BE WONDERFUL FOR
VENICE AND COASTLINE
COMMUNITIES.

P.O. Box 202, Venice, CA 90294
www.venicechamber.net
Phone: 310.822.5425 Email: info@venicechamber.net



1301 Ocean Front Walk #9
Venice, CA 90291

November 1, 2021

To whom it may concern;

My name is Joe Gorrie. I am the owner of The Wee Chippy, a small business on Ocean Front Walk in Venice. I am writing in support of Carl Lambert and his proposed restaurant in Venice. I have known Carl for at least eight years. And during that time, I have seen Carl do a lot for the Venice neighborhood. He has been instrumental in improving the quality of life for both the residents and the business owners. When an outdoor plaza for seating on Westminster Avenue was proposed, Carl was a strong influence in making it happen. Now the food court on Westminster is a destination for visitors, tourists and locals to enjoy good food and be at the beach. I am also a former tenant of one of Carl's buildings. He was a respectful, considerate, and professional landlord. He was very vigilant in keeping up the property.

I firmly believe that Carl's proposed restaurant will create even more good will and opportunity in the neighborhood. Not only will it create jobs, it can be a place people can gather and enjoy good food by the ocean. Like with all of his other projects, this restaurant can only help improve the lives of the residents, tourists and other business owners. It's clear Carl has a passion for Venice and Ocean Front Walk, and I would love to see this new addition to the neighborhood.

Let me know if I can be of further assistance.

Sincerely,

Joe Gorrie

Joe Gorrie
Owner

September 15, 2021

To whomever it may concern:

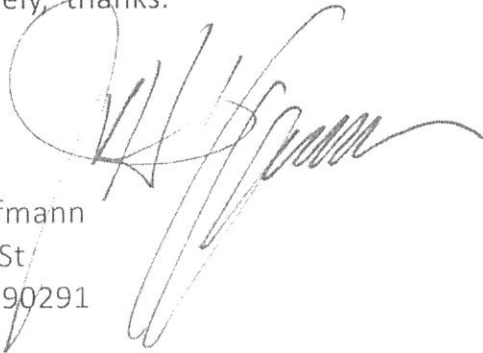
RE: (ZA-2020-1541-CUB-CU)

As neighbors of the Venice V Hotel and long term Venice residents please accept our **SUPPORT** for their requested Conditional Use Permit for the sale and dispensing of a full-line of alcoholic beverages in conjunction with the re-establishment of the ground floor restaurant and basement theater at the historic hotel.

This project has already reactivated the boardwalk and further utilization of the historic ground floor and basement uses will help to provide greater service to the community and help return the visitors that have been lost in the past year to slice of the coast.

Very Sincerely, thanks.

Jack V. Hoffmann
45 Market St
Venice, CA 90291

A handwritten signature in dark ink, appearing to read 'J. Hoffmann', is written over the typed name and address. The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Venice V Hotel Alcohol Permit

1217 Ocean Front Walk

Support Letter Sign-on

I JAKE MATTHEWS, (name) support the Zoning Administrator's approval to permit the sale and dispensing of a full-line of alcoholic beverages at the Venice V restaurant and basement theater (ZA-2020-1541-CUB-CU). I support the approval of the requested Conditional Use Permit & Coastal Development Permit so that the ground floor may come alive with a new restaurant along with the basement theater, bringing energy to the Venice beach front and serving locals and visitors alike. The ZA's approval will reactivate the historic ground floor and basement uses will help preserve and enhance the fabric of the historic building so it can serve generations of Venetians to come while creating positive activity along Ocean Front Walk in the heart of Venice.

Jake Matthews / JAKE MATTHEWS
Signature/Name

205 Ocean Front Walk Venice CA 90291
Address/City (optional)

3-5-24
Date

**110+ CONSTITUENTS SUBMITTED THE FOLLOWING
STATEMENT TO THE APCWESTLA@LACITY.ORG INBOX FOR THE
WEST LOS ANGELES COMMISSION'S CONSIDERATION:**

SUBJECT LINE: Fw: Letters of support 1217 Ocean Front ZA
2021-7223-CUB CU CDP

MESSAGE:

Venice V Hotel Alcohol Permit
1217 Ocean Front Walk
Support Letter Sign-on

I , _____(name) support the Zoning Administrator's approval to permit the sale and dispensing of a full-line of alcoholic beverages at the Venice V restaurant and basement theater (ZA-2020-1541-CUB-CU). I support the approval of the requested Conditional Use Permit & Coastal Development Permit so that the ground floor may come alive with a new restaurant along with the basement theater, bringing energy to the Venice beach front and serving locals and visitors alike. The ZA's approval will reactivate the historic ground floor and basement uses will help preserve and enhance the fabric of the historic building so it can serve generations of Venetians to come while creating positive activity along Ocean Front Walk in the heart of Venice.

Signature/Name

Address/City (optional)

Date

913 Marco Place
Venice, CA 90291
March 5, 2024

Case #ZA-2021-7223-CUB-CU-CDP-1A / The Waldorf

OPPOSE REQUEST FOR CUB

Dear Mr. Brown and West LA Area Planning Commissioners:

I strongly oppose the granting of a CUB as requested in Case #ZA-2021-7223-CUB-CU-CDP-1A / The Waldorf. The case will be heard by the WLAAPC on March 6, 2024.

The building at 1217 South Ocean Front Walk, formerly known as The Waldorf, was a long-time rent stabilized apartment building – a vital part of the Ocean Front Walk residential community. The property owner displaced the majority of the rent-stabilized occupants, removed the kitchens from the apartments so that they are no longer livable for long-term residents, and illegally turned the building into the “Venice V Hotel”: <https://venicevhotel.com/>

The City turned a blind eye to this illegal conversion while we are facing an affordable housing and homelessness crisis. And now, the property owner, a serial flout-er of laws, is hoping to be rewarded by requesting a permit to serve alcohol in this “hotel”. You know who could use a drink? His displaced RSO occupants, but they aren’t invited to the party.

Not only should the West LA Planning Commission deny all requested entitlements, it should also request an investigation into the circumstances that have enabled the property owner to continue to profit from this illegal conversion.

Thank you.

Sincerely,
Mary Jack

Date: 3/06/2024. Appellant: Margaret Molloy & Original Save Venice members - ZA-2021-7223-CUB-CU-CDP-1A.

Commissioners, you must support this appeal for the following reasons:

Relevant Case Law

There is no equitable estoppel to protect continued unlawful activity...

Schafer v. City of Los Angeles (2015) 237 Cal.App.4th 1250, 1262-63; Feduniak v. Cal. Coastal Comm. (2007) 148 Cal.App.4th 1346, 1360.

Carl Lambert's Pattern & Practice

Applicant Carl Lambert is a licensed lawyer (#123029), broker (#BRE: 00860625), and tax specialist. Mr. Lambert is a **serial violator** who converted 5 RSO apartment buildings in the dual permit area of the coastal zone in Venice into de facto hotels at 52 Paloma (8 units), 29 Navy (24 units), 2 Breeze Avenue (32 units), 417 Ocean Front Walk (32 units), and 1217 Ocean Front Walk (36 units) without required coastal development permits and often without building permits. Lambert removed hundreds of people's homes and their sense of community while accruing years of unjustified financial benefits (a) by illegally operating RSO properties as de facto hotels (2) while continuing to pay multi-unit residential property tax, not commercial hotel property tax. No permits, no commercial property tax reassessment. **Lambert's documented pattern and practice of illegal conversions of RSOs cannot be condoned or validated.**

Discontinued Use - ZA erred and abused his discretion

A 1967 Certificate of Occupancy (COO) issued for "Owner: George Lenney" is evidence that Mr. Lenney owned the property from at least 1967 until a sale to Lambert on 7/29/2015. The ZA erred and abused his discretion by approving "existing" legal entitlements for an Apartment Hotel, Restaurant, and Basement Theater based on a 1969 COO issued to Mr. Lenney when there is extensive evidence that all of those uses were discontinued decades ago. The ZA also ignored a COO issued to Mr. Lenney in 1985 for an "...existing four story, Type III, apartment building" which Lenney operated as "Waldorf Apartments and Shops" with long-term tenants above ground floor retail. From the 60's until 1985 Lafayette Café operated from 7am-3pm (only) on the ground floor, with no alcohol service. That space has been a retail clothing store ever since. There was no basement theater. Lambert Management Inc. took over property management in 2013 and Lambert bought the property on 7/29/2015. The documents below (linked) show that Lambert steadily emptied a building that was full of long-term tenants when he took over management. I personally knew many residents of the Waldorf, 2 Breeze, and 417 Ocean Front Walk before Lambert illegally converted those buildings. Each of Lambert's 5 buildings had years of Housing Department RSO, SCEP, and Code Enforcement records, and multiple complaints for "illegal change of use" against Lambert but tenants are gone. All of those public records were available to the ZA.

<https://www.dropbox.com/sc/fi/bkmt5fvz5opq73yqgkgen/CARL-LAMBERT-Los-Angeles-Housing-Department-Compliant-Records.pdf?rlkey=s3t3rl5fvzg00hta8od2s982j&dl=0>

As such, the ZA erred and abused his discretion in determining that there was no substantial evidence that the "Apartment Hotel, Restaurant, and Basement Theater" uses were discontinued, and approving continuing grandfathered non-conforming rights for a hotel within 20 ft. of an R1.5 zone, and a theater in a C-1 zone, with no parking required for either. These approvals are invalid.

Removal of Kitchens is a Change of Use - ZA erred and abused his discretion

Lambert submitted different proposals for the property in 2018, 2020, and 2021, and each has a different description of the "existing" property use. On **1/29/2018** PAR-2018-2094-CUB described an "existing 36-room hotel." On **3/05/2020** ZA-2020-1541-CUB-CU-CDP sought a "CDP to re-establish existing restaurant and existing basement theater" but on 8/13/2020 Representatives at the required "community outreach meeting" also described a proposed "hotel lobby alcohol service area" and a "penthouse patio alcohol service area" with a 24/7 hotel operation with 6am-2am alcohol service (link below). A member of the audience asked if there were rent stabilized units in this apartment hotel and the Representative stated there are "two rent stabilized units" that were being renovated. Another asked if the units have kitchens. Lambert answered: "yes, some of the units have kitchens." That case was withdrawn on 3/23/2022. On **1/26/2021** DBS issued 16016-10003-30772 to "verify unit count per 1967 C of O: 11 Apartments, 22 Light Housekeeping & 3 Guest Rooms." But today, the V Hotel "About" and "Facts" do not mention kitchens in any units.

<https://www.dropbox.com/sc/fi/35bakq7a03a9ot6imy3ys/Venice-V-Hotel-About.pdf?rlkey=l32qae1nq0f8wnx8p92bfq5mb&dl=0>

LAMC 12.03 defines a "Dwelling Unit: A group of two or more rooms, **one of which is a kitchen**, designed for occupancy by one family for living and sleeping purposes; Efficiency Dwelling Unit: A room located within an apartment house or apartment hotel used or intended to be used for residential purposes **which has a kitchen** and living and sleeping quarters combined therein, and which complies with the requirements of Section 91.4930.2 of this Code; Light Housekeeping Room: Any guest room which is designed and used as a bedroom **and for the cooking and preparing of food**, in a conformance with the provisions of Section 91.4930.1 of Article 1, Chapter 9 of this Code. For the purpose of applying the lot area and automobile parking space requirements of the various zones, each light housekeeping room shall be considered as a separate guest room; Guest Room: Any habitable room **except a kitchen**, designed or used for occupancy by one or more persons and not in a dwelling unit." On 09/20/2020 Housing Department Inspector Heber Jurado walked through the building and wrote: "Superintendent stated units ___ and ___ will be the only residential units in the building and the rest will be hotel guest rooms." **Today, on the record, the ZA and the Applicant must clarify exactly how many of the 36 units have kitchens.** Per LAMC 12.03 removal of kitchens would be a change of use because Dwelling Units, Efficiency Dwelling Unit, and Light Housekeeping Rooms all have kitchens, distinguishing them from "Guest Rooms." Conversion of dwelling units to a non-residential use (hotel rooms are not a residential use per IAP) is a violation of the Mello Act unless dwelling units are infeasible at the site, which is not the case here. The Coastal Act requires a CDP for a change of use or change of intensity of use, but the Mello Act would prohibit a conversion from a dwelling unit to a non-residential use. The Applicant did not seek any such entitlements. The ZA did not clarify how many units have kitchens but stated categorically in his LOD that there was no change of use. **As such, the ZA erred and abused his discretion. The ZA and Applicant must clarify the exact number of units with kitchens on the record at the hearing. If kitchens have been removed, the commission must support the appeal. Additional grants cannot be approved.**

Home Sharing Ordinance Prohibits STRs in RSOs

The Home Sharing Ordinance (HSO) specifically prohibits short-term rentals in RSOs. Other Appellants have dealt extensively with this issue and all of those arguments are incorporated here. The Commission cannot grant an approval that violates the HSO.

Misrepresentation of “Existing Conditions on the Ground”

On 9/13/2023 Ira Brown wrote (link): **“The existing permitted use is determined by the Certificate of Occupancy, regardless of existing conditions. However, for the Coastal Act, the standard of review is the existing conditions (facts-on-the-ground).”** Therefore, in the project description it is important to note the project is converting the restaurant to its originally permitted use.” And Mr. Brown stated the approval “exceeding the required 11pm closing time in a Commercial Corner Development” is a “new benefit.” <https://www.dropbox.com/scl/fi/qcfr1ugoi2k9xctikpn0m/1217-Ocean-Front-Walk-Ira-Brown-Response-9-10-2023.pdf?rlkey=xzq72h52iq0g18t0pwkc2i26w&dl=0>
Mr. Brown’s statement illustrates an ongoing conflict with DBS exceeding its authority in the coastal zone because other areas of the City that are not subject to State laws including the Coastal Act and Mello Act. DCP is allowing this abuse of authority. On 10/26/2016 Lambert filed a THP for four months of primary renovation work with a valuation of \$60K. On 8/13/2020 Lambert stated he had gotten about 40 permits for the work done and put a \$10 million dollar valuation on his renovation. All of this was done without a required CDP for a major remodel that will significantly extend the life of a non-conforming building. And, on 12/03/2021 DBS issued a Certificate of Occupancy (15016-10000-09202) for an Apartment Hotel; Theater; Restaurant; Retail, apparently without DCP clearances (link below). Carl Lambert and Elizabeth Peterson cannot claim any lack of knowledge about work that required a CDP in the coastal zone, such as here.

Misrepresentation of Parking

Representative Peterson’s visual presentation today disingenuously includes a DBS Certificate of Occupancy (20020-20000-02005) issued on 8/12/2021 for “parking” at 1217 Ocean Front Walk. That permit (20020-20000-02005) was voided and Permit 20020-20000-02005 was issued on 2/9/2022 for parking for 1211-1215 Ocean Front Walk, the correct address. Ms. Peterson knows this is a misrepresentation. https://www.dropbox.com/scl/fi/wt3ntrbbrfqr1fdi7meho/1217-Ocean-Front-Walk-20020-20000-02005-Certificate-of-Occupancy-for-parking-issued-on-8-12-2021_Voided.pdf?rlkey=yibx3wnbp5k9oy3yga89lj5ee&dl=0

Below is documentation of Lambert’s transformation of the property without a coastal development permit, after non-conforming “Apartment Hotel; Theater; Restaurant” uses had lapsed for decades. For these reasons, you must support the appeal.

1217 Ocean Front Walk - Historic Certificate(s) of Occupancy

<https://www.dropbox.com/scl/fi/015dyffk124qacu23zb1/1217-Ocean-Front-Walk-Historic-Certificates-of-Occupancy.pdf?rlkey=88yo0pctzqblz0h6n9i2ymfci&dl=0>

On **1/08/2014** Lambert signed a residential tenant lease for “Waldorf Apartments and Shops” (as the property was known) using his broker’s license #0086025.

https://www.dropbox.com/scl/fi/igt2u2lsar0sm49wmnpjkt/01.08.2014-1217-Ocean-Front-Walk_Rental-Agreement-for-Waldorf-Apartments-Shops.pdf?rlkey=n5q0t9k5nks77t34rx1zspwqk&dl=0

On **7/29/2015** Los Angeles County Recorder #20150920552 is a Grant Deed for Grantor: Lenney, LLC, and Grantee: Venice Waldorf, LLC; B.L.D. Associates-III, LTD; and Venice Paloma Suites, LLC (all Lambert entities).

<https://www.dropbox.com/scl/fi/itnaapiavxbhvyhsa749/07.29.2015-1217-Ocean-Front-Walk-Lenney-Lambert-Grant-Deed.pdf?rlkey=8owivrvhu6zmlpj7j45hvk6x&dl=0>

On **10/26/2016** Lambert filed a Tenant Habitability Plan (THP) with the Housing Department for “Primary Renovation” between 1/02/2017 and 4/30/2017 (4mths) with an estimated total value of \$60K. Nine of 36 units

are listed for renovation (and vacant). “Relocation” and “Per Diem” are marked N/A by Lambert.

https://www.dropbox.com/scl/fi/0q4wncpxb9d7sesksozux/01.07.2016-1217-Ocean-Front-Walk_HCIDLA-Tenant-Habitability-Plan.pdf?rlkey=stoy7jea85gpe1elyi225gm6z&dl=0

2017 photos of the basement show that there was not an “existing basement theater” at that time.

<https://www.dropbox.com/scl/fi/it00s3w1z6bghkkrvs61c/2017-Basement-at-1217-Ocean-Front-Walk-There-is-No-Existing-Theater.docx?rlkey=76o7p576og5kbw1fy50riajv4&dl=0>

On **1/29/2018** Lambert filed PAR-2018-2094-CUB seeking: “A CUP for full line of alcohol service within a new restaurant on the ground floor of an existing “36-room hotel” as well as hotel rooftop, basement theater, and 36 in-room alcohol access cabinets.”

<https://www.dropbox.com/scl/fi/nmlmhquydom31r3n0y5y/1-29-2018-Lambert-filed-PAR-2018-2094-CUB.pdf?rlkey=6icdljmwvbjh3q1ddzrjndz8a&dl=0>

On **3/26/2018** LAHD “Cash for Keys” (tenant buyouts) records show that tenants were still in the building after more than a year of primary construction inside the building.

https://www.dropbox.com/scl/fi/sproseyh3sivz3jews0u/1217-Ocean-Front-Walk_LAHD-DRC-Rent-Stabilization-File_-3-Pages_-1-100_-Lambert-Buyouts.pdf?rlkey=qkq6ub06q1u6wgfj99wboenm&dl=0

On **3/05/2020** Lambert filed ZA-2020-1541-CUBCU-CDP for a “CDP to **re-establish** existing restaurant and existing basement theater.” This case was withdrawn on 3/23/2022.

https://www.dropbox.com/scl/fi/3c7s82h0wkzfq9d4b1ho/1217-Ocean-Front-Walk_ZA-2020-1541-CUB-CU-CDP.jpg?rlkey=b4aot1uyufkquvn25wm5u9i9&dl=0

On **8/13/2020** a “community outreach meeting” required by the Department of City Planning for ZA-2020-1541-CUB-CU-CDP was held via Zoom due to Covid-19. (screengrabs made during meeting using a personal computer)

https://www.dropbox.com/scl/fi/8jwk1pe83s625sm3fxh1k/1217-Ocean-Front-Walk-community-outreach-meeting-for-ZA-2020-1541-CUB-CU-CDP-via-Zoom_8-13-2020_2.pdf?rlkey=s5krwpo4nq4aib6h1g4znrsnq&dl=0

On **09/20/2020** Housing Department Inspector Heber Jurado inspected 1217 Ocean Front Walk and wrote: “Superintendent stated units ___ and ___ will be the only residential units in the building and the rest will be hotel guest rooms”.

https://www.dropbox.com/scl/fi/b7zohgag3bo5lzbqupurk/LAHD-Inspection-Reports_Heber-Jurado-9-02-2020.pdf?rlkey=s8jgo0bxtkirsj82wslgfrwm&dl=0

On **1/26/2021** DBS issued 16016-10003-30772: Supplemental to Permit 16016-10002-30772 verify unit count per 1967 C of O: 11 Apartments, 22 Light Housekeeping & 3 Guest Rooms. Units: 304, 306, 314, PH-6.

https://www.dropbox.com/scl/fi/5a2ufk2n1p9y8tktt24b/01.26.2021-1217-Ocean-Front-Walk-16016-10003-30772-Unit-Count-per-1967-COO_Owner-Builder-Carl-Lambert.pdf?rlkey=lp8s9n3qpm5bg9p1ak5brdk01&dl=0

On **8/25/2021** Lambert filed ZA-2021-7223-CUBCU-CDP: “CDP to reestablish existing restaurant and existing basement theater.”

<https://www.dropbox.com/scl/fi/g5p89juaf5v97jmr5g8x0/1217-Ocean-Front-Walk-ZA-2021-7223-CUBCU-CDP-filed-8-25-2021.jpg?rlkey=vqld03mrtc7uwiwchmympr51m&dl=0>

DBS Clearances for 2021 Certificate of Occupancy - PCIS 15016-10000-09202 (2 pgs.)

<https://www.dropbox.com/scl/fi/hqtm4wwf3s8geladsgddv/DBS-Clearances-for-2021-Certificate-of-Occupancy-PCIS-15016-10000-09202-2-pgs..pdf?rlkey=c9nria3useoq4opzng4y3jugz&dl=0>

12/03/2021 Certificate of Occupancy (15016-10000-09202) for an Apartment Hotel; Theater; Restaurant; Retail.

<https://www.dropbox.com/scl/fi/nfh8piw3xvwzf8ysen40b/12.03.2021-1217-Ocean-Front-Walk-Certificate-of-Occupancy-15016-10000-09202.pdf?rlkey=j4d3o64s41j1n3dim8ssuutcv&dl=0>



Planning APC West LA <apcwestla@lacity.org>

WLAAPC hearing March 6, Item 5, ZA-2021-7223-CUB-CU-CDP-1A

Noel Gould <aquarianstudios@hotmail.com>

Tue, Mar 5, 2024 at 11:31 PM

To: "ira.brown@lacity.org" <ira.brown@lacity.org>, "apcwestla@lacity.org" <apcwestla@lacity.org>
 Cc: "Karen.Bass@lacity.org" <Karen.Bass@lacity.org>, "Marian.Ensley@lacity.org" <Marian.Ensley@lacity.org>, "Kevin.keller@lacity.org" <Kevin.keller@lacity.org>, "Eunisses.Hernandez@lacity.org" <Eunisses.Hernandez@lacity.org>, "Councilmember.Hernandez@lacity.org" <Councilmember.Hernandez@lacity.org>, "councilmember.krekorian@lacity.org" <councilmember.krekorian@lacity.org>, "paul.krekorian@lacity.org" <paul.krekorian@lacity.org>, "councilmember.blumenfield@lacity.org" <councilmember.blumenfield@lacity.org>, "councilmember.raman@lacity.org" <councilmember.raman@lacity.org>, "nithya.raman@lacity.org" <nithya.raman@lacity.org>, Councilmember Nithya Raman <contactCD4@lacity.org>, "councilmember.yaroslavsky@lacity.org" <councilmember.yaroslavsky@lacity.org>, "councilmember.padilla@lacity.org" <councilmember.padilla@lacity.org>, "councilmember.rodriguez@lacity.org" <councilmember.rodriguez@lacity.org>, "councilmember.price@lacity.org" <councilmember.price@lacity.org>, "cd10@lacity.org" <cd10@lacity.org>, "CD10ConstituentServices@lacity.org" <CD10ConstituentServices@lacity.org>, "councilmember.soto-martinez@lacity.org" <councilmember.soto-martinez@lacity.org>, "councilmember.kevindeleon@lacity.org" <councilmember.kevindeleon@lacity.org>, Tim McOsker-Councilmember CD15 <councilmember.mcosker@lacity.org>, "hydee.feldsteinsoto@lacity.org" <hydee.feldsteinsoto@lacity.org>, "amy.brothers@lacity.org" <amy.brothers@lacity.org>, "Morgan.mann@lacity.org" <Morgan.mann@lacity.org>, "anna.ortega@lacity.org" <anna.ortega@lacity.org>, "Ann.Sewill@lacity.org" <Ann.Sewill@lacity.org>, "Kevin.James@lacity.org" <Kevin.James@lacity.org>, "Matthew.Glesne@lacity.org" <Matthew.Glesne@lacity.org>

Re: The Waldorf, [1217 Ocean Front Walk](#)

ZA-2021-7223-CUB-CU-CDP-1A

Owner/Applicant: Carl Lambert

Honorable West L.A. Area Planning Commissioners,

Short term rentals, for stays of 30 days or less, are prohibited in RSO buildings.

Allowing the Waldorf RSO building to continue operating transient accommodations, a hotel, in violation of the Home Sharing Ordinance (HSO) is selective non-enforcement (aka selective enforcement) as it gives one property owner a privilege that others in a similar situation, with similar facts, are not given.

Many others with RSO buildings, including those previously legally operating in a commercial zone, have tried and have been stopped.

Others with similar properties have been recipients of enforcement actions.

Why is this building and why is its owner above the law?

Does that owner have "connections" within the City that others do not have?

The City Council, which approved the HSO, should be made aware of this.

Thank you,
 Noel Gould
aquarianstudios@hotmail.com



Planning APC West LA <apcwestla@lacity.org>

Case # ZA-2021-CUB-CU-CDP-1A -- Uphold the appeals and deny approval of the requested Conditional Use Permit & Coastal Development

Nancee L. <nancylcalifg@gmail.com>

Mon, Mar 4, 2024 at 8:47 PM

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

Hello,

We are in a housing crisis! This project will only cause more displacement, gentrification, and homelessness!

I urge you to **uphold the appeals and deny approval of the requested Conditional Use Permit & Coastal Development**

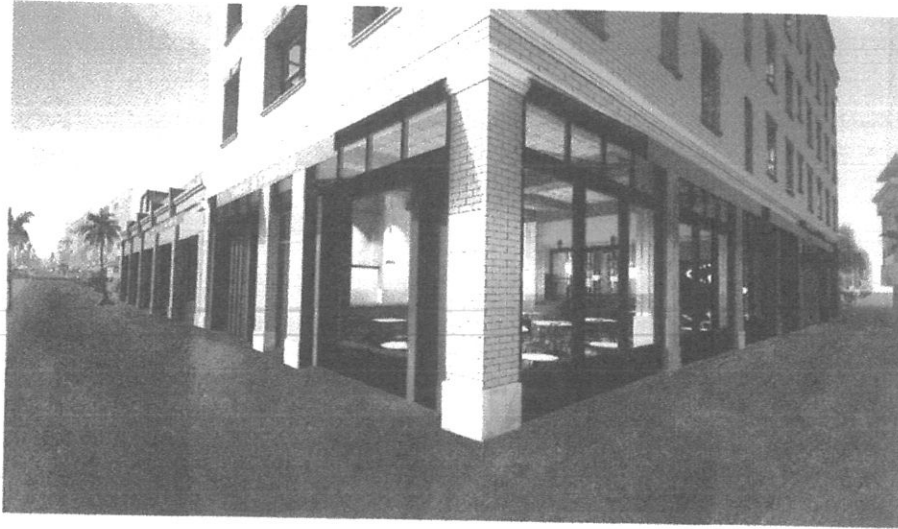
We don't believe that the requested new entitlements (for CUB, restaurant, theater) should be approved in order to enrich the owner of a building that has undergone an unpermitted change of use and that is in violation of the Home Sharing Ordinance (HSO).

Consideration of the conversion/change of use to an unpermitted hotel and related violations must be examined and considered as a part of this case.

Not only should the West LA Planning Commission deny all requested entitlements, it should also **request an investigation into the circumstances that have enabled the property owner to continue to profit from this illegal conversion.**

Thank you.

VENICE WALDORF HOTEL FACT SHEET



The project will breathe new life into the historic Waldorf Hotel on Ocean Front Walk in the heart of Venice. The five-story Waldorf Hotel, which first opened in the spring of 1915, is a focal point of old town Venice. The Waldorf has a storied history; the hotel breathtaking views and luxury character attracted the likes of Charlie Chaplin, Fatty Arbuckle, and Clara Bow all of whom lived at the hotel. With approval of the project, the ground floor will come alive with a new restaurant, bring energy to the Venice beach front, while the renovated hotel will serve visitors and locals seeking a getaway alike. The property's history will shine through the project, creating an authentic and vibrant establishment and experience.

What we are requesting:

- Conditional Use Permit approval for the sale and service of a full-line of alcoholic beverages for a ground-floor restaurant and hotel service areas, a basement theater with 49 seats, and a small rooftop patio.
- Coastal Development Permit Approval to reestablish the building's original permitted uses.

I am a former tenant
of 5 Westminster Ave
for 20 years and now
live at 20 Westminster
for the past 4 years. I
fully support the CUP. Our
neighborhood needs a
place for adults, instead
of the current "clubs".
- Roy Edwards





Planning APC West LA <apcwestla@lacity.org>

Oppose Application ZA-2021-7223-CUB-CU-CDP-1A for illegal hotel conversion

Rick Garvey <rickgarvey@hotmail.com>

Tue, Mar 5, 2024 at 9:30 PM

To: "ira.brown@lacity.org" <ira.brown@lacity.org>, "apcwestla@lacity.org" <apcwestla@lacity.org>

Cc: Rick Garvey <rickgarvey@hotmail.com>

Good evening Mr. Brown,

My name is Rick Garvey and I live a couple blocks from the property at 234 Horizon Avenue. I have owned this property for 25 years and have watched as Venice has gentrified around me. Many of my neighbors who lived in RSO units have been bullied out, bought out, or had their units taken off the market. The result has been skyrocketing rents and a noticeable change in the demographics of Venice. Not as many artists or young people can afford to live here as they once could, and we all suffer because of it. I believe that one of the major drivers of this has been the applicant Carl Lambert. Mr. Lambert has been running short term rentals illegally in Venice for many years and should not be rewarded by allowing him to finish his illegal conversion of the Waldorf to a luxury hotel. His application for an official change of use, his restaurant and ridiculous theater plus the addition of alcohol should all be denied.

Mr. Lambert is in violation of the law and has been for many years. He has systematically done everything he could to remove every long-term tenant in that rent stabilized building and has replaced them with illegal hotel rooms and short term rentals. He has done this while the City is in the midst of a housing and homelessness crisis. Having residential units directly on the boardwalk is important. It increases safety and allows for a greater sense of community, and it has been taken away by the applicant.

As Keep Neighborhood's First outlined in their correspondence, his claim that the hotel use is grandfathered in is without merit because the hotel use was discontinued, so whatever vested rights it may have once had have been lost. A hotel is not permitted at this C1-zoned site without a CUP because the project is within 500 feet of a residential zone. Furthermore, the HSO does not allow use of Apartment Hotels for home sharing, nor does it allow RSO units to be used for home sharing. The applicant is in violation. It is very clear.

As you know, the Los Angeles Housing Department agreed with former Councilmember Bonin, Keep Neighborhoods First, and numerous others years ago who repeatedly objected to the illegal conversion of [1217 Ocean Front Walk](#) from a long-term residential apartment building to a boutique hotel as a clear violation of the City's Home Sharing Ordinance. And here we are again.

In a June 22, 2022 Memorandum, Principal Inspector Hatim Fatehi of the Los Angeles Housing Department's Code Enforcement Division explains that "[u]nits subject to the City's Rent Stabilization Ordinance Ordinance ("RSO") are ineligible for homesharing/short-term rental under the HSO" and "[[1217 Ocean Front Walk](#)] is an Apartment Hotel which is not exempt under the short-term rental definition in HSO."10 LAHD's determination notes the building's owners have paid RSO registration fees for many years through 2022 and never filed for any exemption from the RSO. The LAHD determination also addresses the applicant's oft-cited 1967 certificate of occupancy, finding that "the Property is an Apartment Hotel and Apartment Hotel is not one of the types of structure/use listed in the definition of short-term rental, and the rental units are not within a City-approved Hotel/Motel, the Property is not exempt from HSO and therefore, any short-term rental activity at the building is subject to the requirements set forth in the HSO." The determination's analysis also finds that "units at the Property which are planned for short-term rental activity fail HSO's Primary Residence Test" and "fail HSO's Multiple Home-Sharing Operations Test." Put simply, no unit at the property is eligible for short-term rental use.

And yet the Venice V Hotel continues to offer its rooms, suites, and penthouse bungalows for rent as hotel rooms on a short-term basis at its own website (www.venicevhotel.com) and via most popular hotel booking websites. For example, as this letter is completed, rates for the evening of March 5, 2024 range from \$265 to \$385, exclusive of

taxes and other fees. In fact there is a 2-night minimum tonight. It should be very obvious that short-term renters and hotel guests are not neighbors. They are by definition transients and every unit that Mr. Lambert replaces long term tenants with these transients is a loss to Venice.

Given the project application's obvious fatal deficiencies and the unresolved enforcement of the applicant's numerous continuing HSO violations at the project site, it is frankly unconscionable that the City would even consider holding a hearing on the Venice V Hotel application while the greatest housing crisis in the City's history continues. The City can and should reject the application outright.

Please do so.

Best regards,
Rick Garvey
234 Horizon #5, Venice, CA 90291

Sunny Bak
2214 Pacific Ave.
Venice, CA 90291

September 20, 2021

Re: Support for the Alcohol permit for the Venice V Hotel

To Whom It May Concern:

As a Venice local neighbor since 1995 I **support** the Venice V Hotel's entitlement requests to permit the sale and dispensing of a full-line of alcoholic beverages in conjunction with the re-establishment of the ground floor restaurant and basement theater at the historic hotel property (ZA-2020-1541-CUB-CU).

I support the approval of the requested Conditional Use Permit & Coastal Development Permit for the proposed project so that the ground floor may come alive with a new restaurant along with the basement theater, bringing energy to the Venice beach front and serving locals and visitors alike.

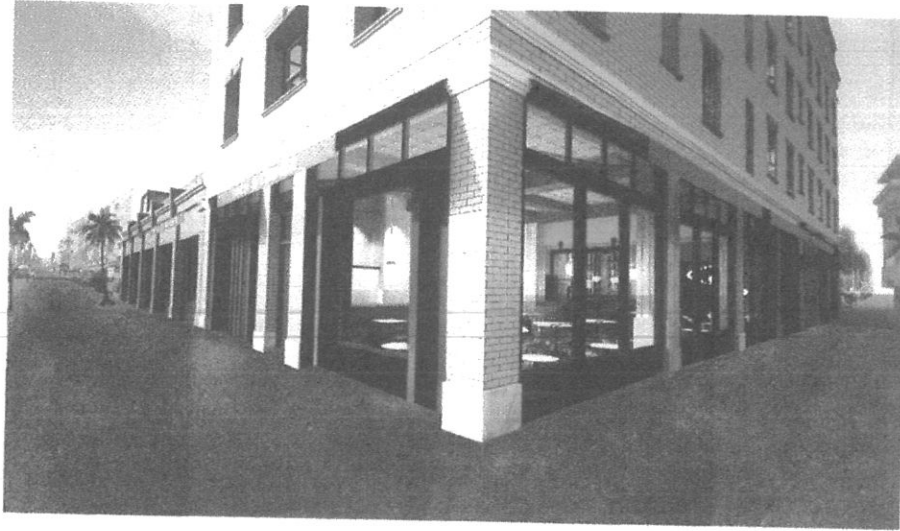
The proposed project to reactivate the historic ground floor and basement uses will help preserve and enhance the fabric of the historic building so it can serve generations of Venetians to come while creating positive activity along Ocean Front Walk in the heart of Venice.

Sincerely,



Sunny Bak

VENICE WALDORF HOTEL FACT SHEET



The project will breathe new life into the historic Waldorf Hotel on Ocean Front Walk in the heart of Venice. The five-story Waldorf Hotel, which first opened in the spring of 1915, is a focal point of old town Venice. The Waldorf has a storied history; the hotel breathtaking views and luxury character attracted the likes of Charlie Chaplin, Fatty Arbuckle, and Clara Bow all of whom lived at the hotel. With approval of the project, the ground floor will come alive with a new restaurant, bring energy to the Venice beach front, while the renovated hotel will serve visitors and locals seeking a getaway alike. The property's history will shine through the project, creating an authentic and vibrant establishment and experience.

What we are requesting:

- Conditional Use Permit approval for the sale and service of a full-line of alcoholic beverages for a ground-floor restaurant and hotel service areas, a basement theater with 49 seats, and a small rooftop patio.
- Coastal Development Permit Approval to reestablish the building's original permitted uses.

I own
20 West Minst
and I support
the CUP
Tony wells



Joan Wells tel# 310-779-1449.



Venice Neighborhood Council



LAND USE AND PLANNING COMMITTEE

PO Box 550, Venice, CA 90294 | www.VeniceNC.org

Email: Board@VeniceNC.org

March 24, 2022

Sent via Email to: ira.brown@lacity.org

Ira Brown

Los Angeles City Planning Department

200 North Spring Street

Los Angeles, CA 90012-2601

Subject: Case No. **ZA-2021-7223-CUB-CU-CDP**
Project Address: **1217 Ocean Front Walk**
Applicant: **Carl Lambert, Venice Waldorf, LLC**

Dear Mr. Brown:

Please be advised that at a regular public meeting of the Venice Neighborhood Council (VNC) Board of Officers, held on March 15, 2022, the following motion was approved on the Land Use and Planning calendar.

MOTION: The Venice Neighborhood Council recommends approval of the project as presented.

ACTION: The motion was approved by a vote of Yea: 12 / Nay: 3 / Recusal: 3.

Thank you for your attention to this matter.

Very truly yours,

James Murez

Venice Neighborhood Council, President

JM/mj

Encl. (1) Staff Report (available at <https://www.venicenc.org/ncfiles/viewCommitteeFile/28853>)

cc: Melissa Diner (via email to secratary@venicenc.org)
Elizabeth Peterson (via email to: elizabeth@epgla.com)
Council District 11 (via email to: Councilmember.Bonin@lacity.org)
Len Nguyen (via email to: len.nguyen@lacity.org)
Jason Douglas (via email to: jason.douglas@lacity.org)



Venice Neighborhood Council

LAND USE AND PLANNING COMMITTEE
PO Box 550, Venice, CA 90294 www.VeniceNC.org
Email: Chair-LUPC@VeniceNC.org



LUPC STAFF REPORT

Report Date: 3/7/2022

Staff: Andrew Mika

LUPC Date: 3/3/2022

VNC Date: 3/15/2022

<u>OVERVIEW</u>	
Address:	1217 Ocean Front Walk
Applicant:	Venice Waldorf LLC
Representative:	Elizabeth Peterson, Elizabeth Peterson Group, LLC
Case No.:	ZA-2020-1541-CUB-CU-CDP & ZA-2021-7223-CUB-CU-CDP
Project Description:	A CDP TO RE-ESTABLISH EXISTING RESTAURANT AND EXISTING BASEMENT THEATER.
Staff Summary:	Applicant requests approval of a Coastal Development Permit to re-establish an existing restaurant and basement theater. The Coastal Development Permit request is associated with a conditional use permit request to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption, in conjunction with an existing, a 1,276 SF restaurant having 43 interior seats located on the ground floor, an existing 748 SF basement theater with 49 seats, an existing 200 sq. ft. penthouse patio with 13 outdoor seats, and a new 645 sq. ft. bar with 17 seats located on the ground floor along with in-room mini-bars in 36 existing rooms in an existing 26,241 sq. ft. apartment hotel. Importantly, <u>no change of use is requested as part of the application</u>. The hotel included a restaurant and theater use in its 1969 Certificate of Occupancy.
Requested Entitlement(s):	Conditional Use Permit for sale and consumption of alcohol (full line)
Venice Sub-Area:	North Venice
Zoning:	C1-1
Existing SF:	Existing building no change to the envelope

Case No.: ZA-2020-1541-CUB-CU-CDP & ZA-2021-7223-CUB-CU-CDP
 Address: 1217 Ocean Front Walk
 Report Date: 2/28/2022
 LUPC Staff: Andrew Mika

Proposed SF:	n/a
Proposed Parking:	0 (see below for explanation)
Number of Units:	0 (see below for explanation)
Mello Act Compliance:	No changes of use relating to hotel/residential uses and therefor no Mello Act analysis required. Building is complaint existing C of O (see drawings sheet SK-10).

COMPLIANCE WITH SPECIFIC PLAN

Setbacks: Existing building no change to the building envelope

Height: Existing building no change to the building envelope

Parking: No parking required due to non-conforming (“grandfathered”) use from 1969 certificate of occupancy (copy below). Notwithstanding, parking is available on the adjacent lot on a first come first serve basis. No covenant is required as part of entitlements requested due to non-conforming rights from 1969.

Address of Building 1217 Ocean Front Walk

CITY OF LOS ANGELES
CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety. This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Act—for following occupancies:

Issued 3-28-69 Permit No. and Year WLA76575/69

(Convert approximately 18' x 40' portion of existing 5 story, type III-A; 40' x 110', restaurant, apartment-hotel and commercial building to theatre, G-1/G-2/H-4 occupancy.)

Owner G.R. Lenney & J.T. Corrodi (owners)
 Owner's Address J. Ciampa (tenant)
 1217 Ocean Front Walk
 Venice, California

By A.E. HEWITT:cc

Form B-95b-1500 Sheet Sets-B-68 (C-10)

ZAA/Waiver: None.

Mass, Character, and Scale Project does not involve alteration of building's footprint from original 1913 construction.

Case No.: ZA-2020-1541-CUB-CU-CDP & ZA-2021-7223-CUB-CU-CDP
Address: 1217 Ocean Front Walk
Report Date: 2/28/2022
LUPC Staff: Andrew Mika

COMMUNITY OUTREACH

Date: 8/13/2020, conducted via Zoom

Notification Radius: 500 feet

Summary of Feedback: The applicant did one noticed community meeting and several follow-up walk throughs and meetings on the property based on requests from the community. According to applicant, 15-20 neighbors attended, mostly supporting the projects. Some attendees oppose project, alleging that hotel was illegally converted from residential to hotel. There is significant support for the project because it will activate this area of Ocean Front Walk. Based on community feedback, the applicant withdrew its request to place mini-bars in the hotel rooms (which had been part of the original request).

LUPC HEARING SUMMARY

Public Comment: There was no public comment.

Board Comment:

Recommended Motion: Approve as presented.

Maker / Second Andrew Mika / Corinne Baginsky

Vote: Yea: 6 / Nay: 0 / Abstain: 0 / Recuse: 1 (Barry) / Ineligible: 0

Case No.: ZA-2020-1541-CUB-CU-CDP & ZA-2021-7223-CUB-CU-CDP
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Addendum by Committee Chair

This Project proposes to restore a longtime restaurant/bar/theater (since at least the 1950s/60s) in one of Venice's original iconic apartment hotels. From the 1960s until 1985, the ground floor of the Project was Lafayette Coffee Shop, a breakfast and lunch eatery.

A 1985 LA Times article was written when Lafayette was closed. (Available at <https://www.latimes.com/archives/la-xpm-1985-06-24-vw-938-story.html>.)

There are several cafes in the immediate surrounding area, and newly created parklet on Westminster. Despite this, very few restaurants on Ocean Front Walk currently have liquor licenses. Given its location, restoring a restaurant use at this will be a visitor serving accommodation.

Due to the era of the building's construction (1913), it was built on the entirety of the parcel (property line to property line) without parking. No parking has ever been required for the building and the existing café/theater, and the restoration of prior uses does not increase the parking requirement.



According to LADBS records, 10 complaints were filed (seven of which were filed within the last 10 years). Complaints allege construction without permits and building conversion to another use. All code enforcement actions have been closed. Complaints referred to HCID do not appear to have resulted in violations either. In any event, claims about the change of use are irrelevant to the Project's current application,¹ which is solely relating to the restaurant, theater, and conditional use permit for alcohol.

¹ Conversion of rental units to hotel rooms is not within the scope of this Project. Notwithstanding, the Court of Appeal for the Second Appellate District issued a published appellate decision concluding that an "Apartment House" was permitted to rent to transient occupants within the R3 zone. See *People v. Venice Suites, LLC* (Super. Ct. No. BC624350) Nov. 15, 2021, decision is available at: <https://www.courts.ca.gov/opinions/documents/B300960.PDF>. While the Project at bar is an existing "Apartment Hotel" situated in a C1 zone, to the extent these two hybrid apartment/hotel buildings are similar, there is no reason to believe the legal conclusion reached in *Venice Suites* would be any different should the City contest transient use of the Venice Waldorf.

Case No.: ZA-2020-1541-CUB-CU-CDP & ZA-2021-7223-CUB-CU-CDP
Address: 1217 Ocean Front Walk
Report Date: 2/28/2022
LUPC Staff: Andrew Mika

Code Enforcement Information:			10
Date Received	Problem Description	Status	
1/19/2005	OUTDOOR ADVERTISEMENTS (SIGNS) OF GOODS OR SERVICES AVAILABLE ON SITE	CLOSED	
8/22/2005	POOL EQUIPMENT OR AIR CONDITIONER NOISE INSPECTION	CLOSED	
10/19/2006	OUTDOOR ADVERTISEMENTS (SIGNS) OF GOODS OR SERVICES AVAILABLE ON SITE	CLOSED	
1/22/2013	CONSTRUCTION IN PROGRESS WITHOUT PERMITS OR INSPECTIONS	CLOSED	
7/21/2016	CONSTRUCTION IN PROGRESS WITHOUT PERMITS OR INSPECTIONS	CLOSED	
3/13/2017	CONSTRUCTION IN PROGRESS WITHOUT PERMITS OR INSPECTIONS	CLOSED	
3/28/2019	MISCELLANEOUS COMPLAINTS	CLOSED	
8/23/2020	ANY CHANGES DONE TO A PROPERTY IN AN HISTORICAL AREA	CLOSED	
12/17/2020	BUILDING OR PROPERTY CONVERTED TO ANOTHER USE	CLOSED	
12/7/2021	BUILDING OR PROPERTY CONVERTED TO ANOTHER USE	CLOSED	



Planning APC West LA <apcwestla@lacity.org>

ZA-2021-CUB-CU-CDP-1A

Westside LA Tenants Union <westsidelatu@gmail.com>

Wed, Mar 6, 2024 at 8:16 AM

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

On behalf of the Westside local of the LA Tenants Union, we demand that you uphold the appeals and deny the approval of the requested Conditional Use Permit and Coastal Development Permit for case number ZA-2021-CUB-CU-CDP-1A. The owner of the Waldorf in Venice has illegally removed affordable units from the Coastal zone, against the Mello Act, and has displaced RSO tenants in the midst of an eviction crisis. They should not be rewarded for this illegal and wrong behavior.

Thank you,

Westside Los Angeles Tenants Union
Sección de Lado Oeste del Sindicato De Inquilinxs
-- Join the Union --