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

Item No. 7

Department of City Planning

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

March 9, 2026

TO: City Planning Commission

FROM: Sienna Kuo, Planning Assistant

INFORMATIONAL MEMO FOR STAFF RECOMMENDATION REPORT, EXHIBIT H: PUBLIC CORRESPONDENCE FOR CASE NO. CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; 1410 – 1422 SOUTH MAIN STREET

The following informational memo is to be incorporated into Exhibit H: Public Correspondence of the Staff Recommendation Report to be considered by the City Planning Commission meeting of March 12, 2026, related to Item No. 7 on the meeting agenda. The informational memo includes the addition of a Venice Neighborhood Council Staff Recommendation Report, which was inadvertently omitted during exhibit preparation.

The Venice Neighborhood Council Staff Recommendation Report outlines the project history, reason for recommending denial, neighborhood feedback and suggestions, current conditions, and findings against the proposed project.

Venice Neighborhood Council

P. O. Box 550, Venice, CA 90294
www.VeniceNC.org

December 9, 2025

Sienna Kuo, Planning Assistant
Sienna.Kuo@lacity.org
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012

Re. 1410-1414-1422 Main Street, Venice
CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

Dear Sienna,

The following motions were approved by the Venice Neighborhood Council (VNC) Board at its December 9, 2025 meeting:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

and

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

.

7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.

The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.

The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10′ minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade

directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.
The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.
The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.
The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.
The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing

small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Please contact Mark Mack, Chair of the VNC Land Use & Planning Committee, at Mark.Mack@VeniceNC.org should you have any questions related to this letter and these motions.

Sincerely,

Brian Averill, President
On behalf of the Venice Neighborhood Council

cc:
Mark Mack, Chair, VNC Land Use & Planning Committee
Shannon Vaughn, Coastal Program Manager, California Coastal Commission
Dani Ziff, District Supervisor, California Coastal Commission
Craig Bullock, Planning Director, Council District 11
Jeff Khau, Planning Deputy, Council District 11
Sean Silva, Venice Field Deputy, Council District 11
Ira Brown, City Planner
Tony Russo, Crest Real Estate
Nick Leathers, Crest Real Estate

Attachment: LUPC Staff Report

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

Land Use & Planning Committee (LUPC)
STAFF REPORT
December 9, 2025

City Case No:	**CPC-2021-2020-DB-CDP-SPPC-MEL-HCA**
CEQA Case No:	**ENV-2021-2021-EAF: Categorical Exemption under CEQA sections 15301 (Class 1) and 15332 (Class 32)**
Related City Case No(s):	**CPC-2013-2377-DB-CDP-SPP-MEL**
Address of Project:	**1410-1414-1422 Main Street**
Applicant/Property Owner:	**Brittany Teague, Three on the Tree LLC, a Nevada LLC, and Three on the Tree Venice LLC, a Nevada LLC**
Applicant's Representative:	**Tony Russo, Crest Real Estate** **Matthew Royce, Architect**
Standard of Review:	**Coastal Act, with certified Land Use Plan (LUP) as guidance (for CDPs)** **Venice Community Plan** **Other applicable State laws: Assembly Bill 2097** **Other applicable City laws: ADU ordinance** **Mello Act & Housing Crisis Act**
Coastal Zone:	**Single Permit Jurisdiction**
City Hearing:	**December 10, 2025, 1 pm**
Email for City Planner:	**Sienna.Kuo@lacity.org**
LUPC Staff assigned:	**Robin Rudisill & Mark Mack**

I. Detailed Project Description:

Demolition of 2 single-family dwellings, and the construction of a 26,845 SF, 5-story mixed-use structure on 3 lots, consisting of 19 residential units, of which 4 residential units will be set aside for Very Low Income (VLI) households; 6,152 SF of restaurant uses including 3,177 SF of indoor dining Service Floor Area and 467 SF of outdoor dining Service Floor Area; 656

SF of office uses and a roof deck with a solar trellis covered rooftop and an elevator/roof access structure, providing 28 parking spaces (24 tandem residential use spaces and 4 commercial use spaces) within a one level subterranean garage.

Reason for VNC/LUPC hearing this project:

The project representative failed to inform the neighborhood, LUPC and the VNC of the project's changed scope and impact on the neighborhood since the VNC heard the project in early 2021, almost 5 years ago. They have not conducted the proper neighborhood outreach necessary for the increased size and scope of this project, causing a strong neighborhood resistance to the project.

Therefore, the Venice Neighborhood Council scheduled a LUPC hearing (December 4th) and a Special VNC Board hearing (December 9th) in order to assess this significantly changed project and the impacts it presents to the neighborhood.

Changes between original project that VNC heard in 2021 to current version of the project:

1. Unit count increased from 9 units to 19 units (4 of which are affordable).

2. Parking garage reduced from two subterranean levels with 56 parking spaces to one subterranean level with 28 parking spaces.

3. Access is not through Main Street but rather through the alley, a very narrow 15' wide alley.

4. 3 stories to 5 stories (4 stories + 1 story solar trellis covered rooftop, roof access structure and elevator).

5. Height increase from 30' to 46'- 4" (maximum height of 57'10" with 15', 176 SF elevator overrun (vs. 10', 100 SF RAS) and solar trellis covered rooftop)

6. FAR increased from 1.49 to 2.95.

7. Restaurant spaces added on 2nd and 3rd floors, resulting in commercial grade occupancy on the second and third level of the structure, overlooking and adjacent to neighboring low-rise residential buildings.

II. Motion 1:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

Moved: Mark Mack
Seconded: Robin Rudisill
Vote: 6-1-1 (0 absent, 0 recused, 1 open seat)

III. Motion 2:

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
.
7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.
The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.
The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10′ minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-

foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.
The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.
The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.
The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone

Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.
The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Moved: Mark Mack
Seconded: David Turnbull
Vote: 8-0-0 (0 absent, 0 recused, 1 open seat)

IV. Motion 3 (continued indefinitely):

The Venice Neighborhood Council strongly recommends that the project be confined to 100% residential, within the development standards and policies of the Venice Specific Plan and LUP, which would: provide homes, be compatible with the surrounding residential neighborhood character, not create the

significant adverse impacts and nuisances on the surrounding residential neighborhood that commercial businesses would, and not violate the state Mello Act.

Motion 3 continued indefinitely:

Moved: David Feige
Seconded: Mark Mack
Vote: 6-1-1 (0 absent, 0 recused, 1 open seat)

V. Pros & Cons of Project:

Positive aspects of project:
4 affordable units.

Negative aspects of project:
Concerns about hearing notices: Several parties indicated that they did not receive the hearing notice, including Rick Garvey (within 300 feet) and Dr. Khoe (adjacent).

See also detailed findings in LUPC motion, above.

I. Neighborhood Outreach/Summary of Community Input:

Describe neighborhood outreach by Applicant's Representative and LUPC Staff Member, in detail:

The applicant made it clear that they were not paid to do neighborhood outreach on the significantly changed project and that they did outreach on the original project. However, they did contact Karen & Art from the condo building across Main Street. Once LUPC became aware of the project hearing being scheduled, we immediately scheduled a meeting to hear it so that it could be heard by the VNC prior to the City hearing. We contacted the applicant's representative and met with them prior to the LUPC meeting. We informed a few of the neighbors, whom we were aware of were concerned about the project.

Summary of Community Input

Concerns expressed by Neighbors:
The proposed loading dock is not large enough to serve most of the 5 and 10 ton and larger trucks that make these deliveries, and so many will simply park in the alley, which will prevent residents, as well as emergency vehicles, from coming and going. Trucks will also park down the middle of Market St. It is not uncommon for several trucks to be making deliveries simultaneously.

The project is outrageous, this is overbuilding, this is egregious, this is greed.

When neighbors in the residential blocks behind the project to the east look out their windows, they will see a big 5 story wall and won't be able to see the sky any longer.

Concern about habitability of the residential units adjacent to upper floor restaurants. Concern about the mixing up of uses in a strange way on the upper floors. Concern about combining access/entrances for residents and commercial uses.

See additional concerns in these letters from the neighbors:
https://www.venicenc.org/assets/documents/5/meeting69332e44d78a1.pdf

Suggestions from Neighbors:
At the LUPC hearing a request was made to the applicant for a sun/shade study. As of the publishing of this LUPC Staff report, the applicant has not provided the study.

As per neighbor Irv Katz, he would ask the developers to consider confining this proposal to a 100% residential use, within the requirements of the Venice Plan, which would provide homes and not create the problems that commercial businesses such as a restaurant would, including no constant flow of traffic into or out of the garage and no daily deliveries to block the alley or streets or create noise.

The traffic analysis excludes the restaurant uses entirely from the trip count by claiming the restaurants are "local serving." But restaurants with alcohol and outdoor dining are not local serving uses. "Local serving" refers to small convenience businesses (e.g., laundromat, dry cleaner, etc.), not destination restaurants. Restaurants in Venice draw visitors from outside the immediate neighborhoods. Restaurants have a very high trip counts (sit-down restaurant approx. 100 trips per 1,000 SF), especially when they serve alcohol. Excluding the restaurants keeps the project below the 250-trip threshold, dodging a full transportation analysis. This must be corrected and a full analysis done. DOT must require the inclusion of the restaurants in the trip count, which will require them to perform a traffic analysis.

The project seems to be trying to fit too much into an inappropriate lot. That is a sure sign of a developer more interested in profit than community.

II. Findings re. Entitlements:

For your use in determining the entitlements, here is the link to the City Planning Prefix (approving entity) and Suffix (entitlements) Report where you can look up the City Case No. coding abbreviations:
https://planning.lacity.gov/resources/prefix-suffix-report

A. Coastal Development Permit (CDP) – Coastal Act & certified Land Use Plan (LUP) are standard of review

NOTE: The lot at 1410 Main St is vacant land as per ZIMAS. There is no Coastal Development Permit (CDP) approving a demolition of any structures that were previously on the 1410 Main St lot, which would imply that such a demolition must be covered with an after-the-fact approval in this CDP. However, the applicant provided a building permit application for demolition of an existing structure in 1968, which means this demolition was done pre-Coastal Act (57 years ago) and therefore doesn't require a CDP. It is unknown whether or why the lot has remained undeveloped for 57 years. The lot is currently used as residential/office space using converted shipping containers. The structures and uses currently on the vacant lot are not permitted and therefore constitute a violation of the Coastal Act as they are unpermitted development:



1. **Parking/Coastal Access – Assembly Bill 2097 must also be considered in the standard of review**

Coastal Act Section 30252 states: ***The location and amount of new development should maintain and enhance public access to the coast by facilitating the provision or extension of transit service…and providing adequate parking facilities or providing substitute means of serving the development with public transportation***

The project lies in an AB 2097 area and as such minimum parking cannot be required. However, the applicant proposes only 28 parking spaces, which is significantly lower than the parking minimums required by the Venice Specific Plan and certified Land Use Plan (LUP). No proposed mitigations were noted. The 15' alley is too narrow for any real use, especially one that requires truck traffic, 2-way traffic, or a clear path for others to access parking spaces. Most Venice alleys are 25' and it is still difficult to enter one's garage nor can two cars pass.

2. **Scenic and Visual Qualities**

Coastal Act Section 30251 Scenic and visual qualities states: ***The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.***

At 5 stories and 57'10", and spanning three lots with no visual breaks, the project is in no way compatible with the character of the surrounding area, which is primarily 1-lot, 2-3 story structures. The project violates Coastal Act Section 30251.

3. **3-Lot Consolidation**

Certified Land Use Plan Policy I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10' minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

Policy I. B. 7. Commercial Development Standards. The following standards shall apply in all commercial land use designations, unless specified elsewhere within this Land Use Plan.

Density/Intensity: Maximum Floor Area Ratio (FAR)

0.5 to 1 for retail only (including restaurants)
1.0 to 1 for retail / office
1.5 to 1 for retail and/or office and residential

Parking: See Land Use Plan Policies II.A.3 and II.A.4.

Lot Consolidation. Two commercial lots may be consolidated, or three with subterranean parking with the following restrictions:

1. Methods for insuring that the structure does not look consolidated (breaks in front wall of ten feet minimum) shall be utilized.

2. Subterranean parking shall be fully depressed with roof at natural grade.

Exception: Lot consolidation of more than two lots shall be permitted for mixed-use projects which conform to the existing scale and character of the surrounding community and provide adequate on-site parking.

Building Separation: A minimum of five feet between commercial and residential buildings (except for mixed-use projects).

Yards: Per the following Ground Level Development Policy which requires that commercial development be designed in scale with, and oriented to, the adjacent pedestrian accessways (i.e. sidewalks).

Ground Level Development: Every commercial structure shall include a Street Wall, which shall extend for at least 65% of the length of the street frontage, and shall be located at the property line or within five feet of the property line, except on Ocean Front Walk, where all commercial buildings shall have the Street Wall set zero (0) feet from the building line. The required Street Wall at sidewalk level shall be a minimum of 13 feet high. (A Street Wall is the exterior wall of a building that faces a street.)

Street Walls adjacent to a sidewalk café, public plaza, retail courtyard, arcade, or landscaped area may be setback a maximum of 15 feet along the project which consists of the sidewalk café, public plaza, retail courtyard, arcade, or landscaped area. Such areas shall not be considered in calculating the buildable area of a project but, with the exception of areas used only for landscaping, shall be considered in calculations for required parking.

At least 50% of the area of the ground floor Street Wall shall be devoted to pedestrian entrances, display windows, and/or windows affording views into retail, office, gallery, or lobby space.

Blank walls shall be limited to segments of 15 feet in length, except

4. Protection of Special Coastal Communities

Coastal Act section 30253(e) states: ***New development shall do all of the following…(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.***

LUP Policy Preservation of Venice as a Special Coastal Community states:

Preservation of Venice as a Special Coastal Community	**Policy I. E. 1. General.** Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.
	Policy I. E. 2. Scale. New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect
	Policy I. E. 3. Architecture. Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

According to ZI 2453, the project is located in the Lost Venice Canals Historic District, which is significant as a unique example of early-20th century residential development oriented around the original Venice canals developed by Venice of America founder Abbot Kinney. The district was evaluated as a whole and individual properties were surveyed and identified as Potential Contributors or Non-Contributors to the district, or as Not Sure (properties generally not visible from the public right-of-way). Properties identified as Potential Contributors or Not Sure in SurveyLA, unless otherwise found exempt, will be reviewed by the Department of City Planning, in consultation with its Office of Historic Resources, to determine if the property is a "historical resource" as defined in CEQA. If the City determines the property to be a historical resource, the City will evaluate if the project would have significant impacts to the historical resource. Even if the property is not determined to be a historical resource, the City will evaluate if the project would have an impact on other nearby historical resources, which may include the potential historic district.

The structure on 1422 Main St was identified as "Not Sure" in SurveyLA, which means that it should be reviewed by the Department of City Planning, along with the Office of Historic Resources, to determine if the property is a historical resource. Excerpt from SurveyLA:

Venice Report

Historic Districts, Planning Districts and Multi-Property Resources – 04/02/15

SurveyLA
Los Angeles Historic Resources Survey



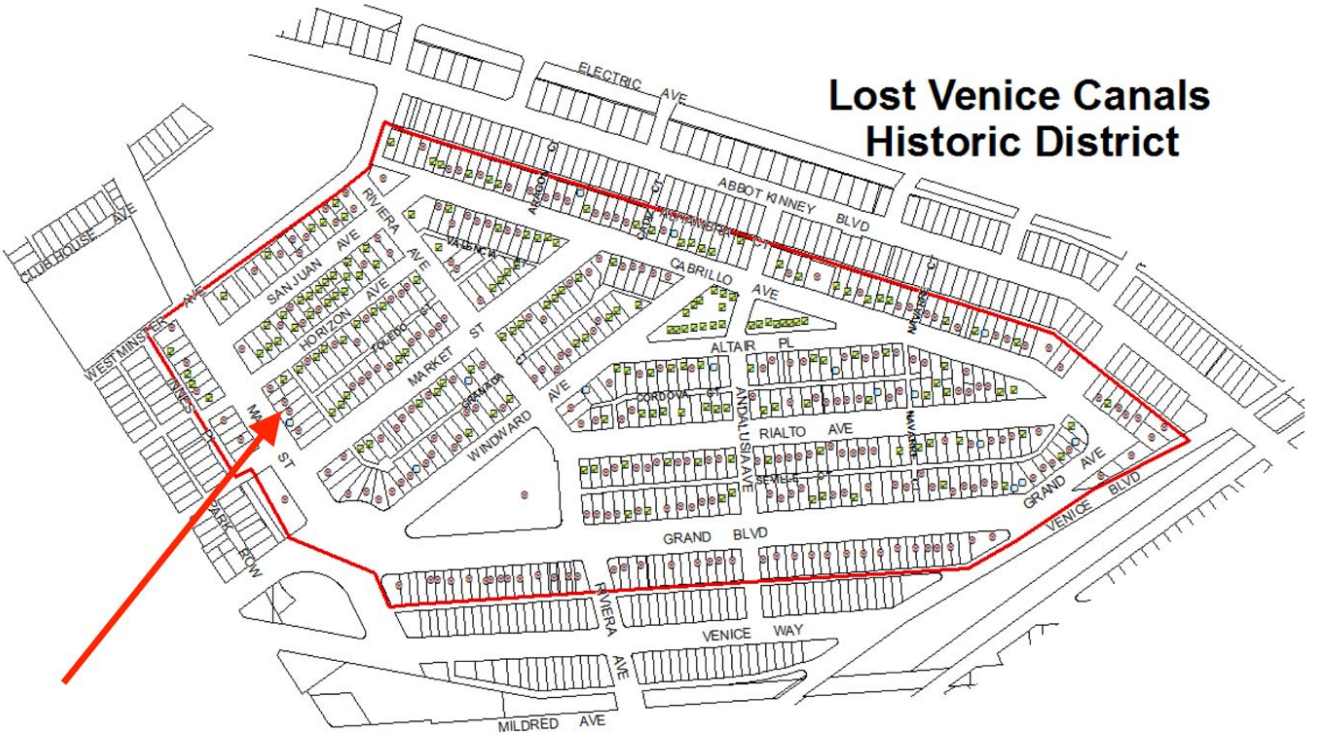
Primary Address:	1422 S MAIN ST
Type:	Not sure
Year built:	1921
Property type/sub type:	Residential-Single Family; House
Architectural style:	Craftsman

It is not clear whether the City's Office of Historic Resources has analyzed the project's impact on the historic district.

Venice was designated as a "Special Coastal Community" by the City of Los Angeles and the California Coastal Commission, as documented in the LUP. The definition of Special Coastal Community is: "An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast." If the Lost Venice Canals Historic District is degraded by a project such as this that is so significantly out of compliance with the LUP in so many ways, the risk of Venice losing its Special Coastal Community status is increased because the very definition of Venice as a Special Coastal Community relies on Venice's historical heritage. Thus, the project does not protect the Special Coastal Community of Venice and in fact degrades it and thus is in violation of Coastal Act section 30253(d) and LUP Policy I.E.1.

As stated in ZI 2453, the Lost Venice Canals Historic District is a residential neighborhood with boundaries coinciding with those of Venice's original canal district. Streets throughout the district exhibit an irregular pattern which reflects the area's original network of canals. Development in the district is primarily residential. Original single and multi-family residences were constructed primarily from the 1910s through the early 1920s and are one or two stories in height. Other features of the district include the unique configuration of the streets, which create irregularly shaped blocks originally bounded by canals.

According to ZI-2453, the Lost Venice Canals Historic District is significant as a unique example of early-20th century residential development, oriented around the original Venice canals developed by Venice of America founder Abbot Kinney. The district's period of significance is 1904 to 1929, encompassing the period during which the canals were extant. The district represents the area set aside by Kinney for residential development in Venice. After a years-long legal battle between residents and city officials, in 1929 the Venice of America canals were filled in and paved over. Today, the Lost Venice Canals Historic District stands out from surrounding development due to its unique planning and development around Venice's original system of canals. Despite a relatively low percentage of contributing properties, ***the neighborhood retains a distinctive feel that conveys a strong sense of time and place.***



As with the first attempt at a development project at this site in 2014, which was withdrawn within one year of application, the historic preservation issues remain unaddressed.

5. **Cumulative Effect**

Coastal Act section 30250 (a) states: ***New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources…***

This project violates Coastal Act Section 30250(a) because it places a large, high-intensity mixed-use development in a built-out, historic, low density coastal neighborhood that is not "able to accommodate it" in terms of circulation, parking, and public services, as shown by the documented loss of required parking and substandard alley access. By over-concentrating development on this constrained site and worsening traffic and parking conditions that already limit public access to the beach, the project will have significant adverse cumulative effects on coastal resources, contrary to section 30250(a).

B. Density Bonus Act (DB)

1. The "Major Transit Stop" qualifying the project is at Windward Circle.

2. With 4 Very Low Income (VLI) units, the project qualifies for 4 incentives (unlimited waivers of development standards is allowed).

The following Density Bonus incentives are requested:

1. Off Menu request for a Floor Area Ratio (FAR) increase of 96.6 percent resulting in a FAR of 2.95, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3.
2. Off Menu request for a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.
3. Off Menu request for a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.
4. A zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a).

The following Waivers of Development Standards are requested:

1. Maximum building height of 57' 10", in lieu of 30', as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.
2. 100% decrease in usable open space from 2,525 square feet required.
3. Removal of the step back provisions, in lieu of a 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F(3)(a).
4. A Roof Access Structure with a maximum height of 15 feet in lieu of 10 feet, as otherwise required pursuant to the Venice Coastal Zone Specific Plan Section 9.C.
5. A Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

3. Harmonizing of State Density Bonus Act and State Coastal Act

Government Code Section 65915(m) of the state Density Bonus law states that all density bonus incentives, waivers, etc. to which the applicant is entitled under Government Code Section 65915 shall be permitted in a manner that is consistent with both the Density Bonus law and the Coastal Act. The State Legislature's intent is that the two statutes be "harmonized" so as to achieve the goal of increasing the supply of affordable housing in the Coastal Zone while also protecting Coastal Resources and Coastal Access.

According to the Coastal Commission's February 6, 2019 Report (W7f), the two state laws are to "be harmonized to provide for affordable housing in the Coastal Zone in a manner that is consistent with Coastal Act resource protection policies and ensures that the Act's scenic and visual resources policy is not used erroneously as a basis for blocking density bonus projects in the Coastal Zone." This means that the question is whether a project is

seeking the minimum incentives and waivers necessary to provide for the affordable units. The problem in determining the answer is that State Density Bonus law mandates that evidence of the need is not required. Therefore, applicants are able to ask for more incentives and waivers than they need to cover the cost of providing the affordable housing, which appears to be the case for this project.

This project does ***not*** harmonize the State Density Bonus Act and State Coastal Act due to the **extreme de facto variances** from the development standards and policies of the Venice Specific Plan and LUP—3-lot consolidation rather than the maximum of 2, almost doubling of the height to 57'10" vs. the LUP requirement of 30', essentially doubling of the FAR (2.95 vs. allowable 1.5), removal of the step back provisions, 3' reduction of both side yards.

For example, in the 657 Sunset case, the LUPC concluded that, on balance, the requested incentives and waivers were modest compared to typical density bonus projects in non-Coastal Zone areas of Los Angeles, and that the project omitted a roof deck, kept the fourth floor stepped back, and provided 24% VLI units, such that the density bonus incentives could be harmonized with Coastal Act resource protection for that project.

However, for 1410-1414-1422 Main, the applicant is requesting relief from several of the most sensitive standards in the Venice Coastal Zone:

- Almost doubling the height
- Essentially doubling of the maximum FAR
- Major yard reductions on all sides
- No step backs
- Significant reduction in on-site parking relative to VCZSP/LUP requirements in an area that is extremely close to the beach
- Consolidation of three lots (beyond the 2-lot maximum per VCZSP/LUP)

The project's design seeks to maximize buildout in every dimension. The applicant has not demonstrated that all of these requested incentives and waivers are the minimum physically necessary to accommodate the 4 affordable units. As a mixed-use project, the incentives--which are larger than others requested in the Venice Coastal Zone used to fund the provision of affordable units--not only provide for enough market rate residential units to fund the affordable units, but the incentives also provide a significant benefit in terms of the commercial uses, which are 25% of the project (6,808 SF/26,845 SF), which is an exploitation of the Density Bonus law.

Given the size and intensity of the proposed structure, it appears highly likely that a shorter, less massive building could still provide a meaningful number of affordable units while protecting coastal resources.

Under §65915(m), the City cannot treat the Density Bonus Law as overriding the Coastal Act or the LUP. Instead, the City must limit or deny incentives and waivers that would

otherwise cause the project to conflict with Coastal Act resource protection policies, including:

- Significant adverse impacts on coastal access and parking
- Degradation of scenic and visual resources in a highly scenic area--the Lost Venice Canals Historic District
- Harm to a recognized Special Coastal Community

The City is obligated to withhold those specific waivers and require redesign so that affordable housing goals and coastal protection goals are ***both*** honored.

The project does *not* comply with the Density Bonus Act because the project, as proposed, does not harmonize the Density Bonus Law with the Coastal Act. Instead, it uses density bonus tools to attempt to override key coastal protections (height, parking, FAR, massing, lot consolidation) in a manner that is directly contrary to §65915(m)'s command that density bonus entitlements be granted only in a Coastal-Act-consistent manner. This project is an abuse of the Density Bonus law.

4. LUP Policy I.A.13. Density Bonus Applications

Policy I. A. 13. Density Bonus Applications: ***Required replacement dwelling units shall be counted as reserved units in any related State-mandated density bonus application for the same project. In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915 provided that the affordable housing complies with sections a – f of Policy I.A.13.***

The project does ***not*** conform with LUP policy I.A.13. for all of the same reasons noted above that it does not comply with the Density Bonus Act.

C. Mello Act (MEL)

This project violates the Mello Act (Gov. Code §§65590–65590.1). The Mello Act state law protects housing in the Coastal Zone. The purpose of the Mello Act is three-fold: *to maintain existing residential structures*, to protect existing affordable *units*, and to provide new affordable housing in new developments. The law states:

> "The conversion or demolition of any residential structure for purposes of a nonresidential use which is not coastal dependent...shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."

The statute flatly prohibits demolishing or converting an existing residential structure to a non-residential use that is not coastal-dependent unless the local government first determines, based on evidence, that residential use is no longer feasible at that location. No such feasibility finding has been made here, and the facts show the opposite:

- The legal, permitted use of the existing buildings is residential.
- The structures are functioning residential housing in a residential context.
- Nothing in the record shows that continued residential use is infeasible—only that the applicant ***prefers*** a more lucrative commercial/mixed-use project.

The legal, permitted use for the existing structures is residential; thus, they are protected by the Mello Act regardless of the underlying zoning designation, and any project for these properties must be residential use only. The Mello Act state law does not distinguish between zones, it protects all residential structures and affordable units, regardless of what zone they are in. The project cannot be approved as a mixed-use project whose purpose is to convert coastal housing into any portion of commercial space.

The Mello Act was enacted to prevent exactly this pattern—the erosion of coastal housing stock, especially lower-cost units, in favor of high-profit commercial uses, just like this project. Approving this project would defeat the very purpose of the statute and would be inconsistent with both state law and the City's own Mello Act implementation procedures.

The applicant believes that because the City, in 2019, proposed a Mello Act ordinance that would have allowed demolition of a residential structure for purposes of a mixed use project if the project provided all required replacement affordable and inclusionary units, that they could do so with the proposed project. However, this provision would have constituted a change to the existing Mello Act law and City Mello Act policy, and the draft ordinance was never approved. The Council file (15-0129-S1) expired in November 2023 and in fact no effort has been made since then to resurrect this significant proposed change:

> Proposed new LAMC 12.21H.c.7.: "Mixed Use Development. A proposed mixed use development may not result in a net reduction in the total number of existing Residential Units unless a residential use is no longer feasible. A mix of uses is permitted, so long as the structure provides all required Replacement Affordable and Inclusionary Units."

The fact that City Planning was requesting this change in their draft of the Mello Act ordinance shows that it is not currently allowed; otherwise, they would not have wanted or needed to add this provision.

See Attachment I for a May 4, 2021 letter from housing rights and environmental/land use attorney Venskus & Associates and the California Women's Law Center that explains why this proposed change would be unlawful and could not have been lawfully approved. As stated in this letter: "One of the main avenues the Mello Act proscribes for protecting residential housing is to limit the ability to convert existing residential structures to non-

residential uses. To allow such conversions would not only violate both the letter and the spirit of the Mello Act, but it would plainly threaten housing, by allowing its destruction for purposes of a more lucrative commercial use, including mixed use projects, thus displacing families and damaging coastal communities that are already holding on by a thread—exactly what the Mello Act was intended to prevent." The Applicant's demolition of the existing residential structures for purposes of a non-residential mixed-use project is a violation of the Mello Act and the City's Interim Administrative Procedures for complying with the Mello Act, and thus this mixed-use project is a non-starter.

In addition, in its letter dated October 19, 2021 regarding the draft Mello Act ordinance, the Coastal Commission Staff stated: "The mixed-use development policy outlined [in the draft Mello Act ordinance, proposed new LAMC 12.21.H.5.c.7] is therefore not consistent with the Mello Act, since it expands the definition of "residential structure" beyond the intent of the Mello Act. Commission staff is aware of several recent developments, especially in Venice, that have already incorporated draft language of this ordinance to justify approval of the demolition or conversion of residential properties for purposes of mixed-use properties along commercial corridors."

Lastly, the City's May 18, 2022 letter from the Los Angeles Housing Department with the subject "Mello Act Determination" is a determination with respect to only one requirement of the state Mello Act--the affordability of the existing units. As per the City's Mello procedures, the overall Mello Act Determination would be included in the related discretionary permit, the Coastal Development Permit, where all three Mello Act requirements would be considered: *whether existing residential structures are being replaced only with residential structures*, whether existing affordable *units are being replaced*, and whether inclusionary affordable housing is being provided.

D. Housing Crisis Act (HCA)

According to the City in its October 29, 2025 letter from the Los Angeles Housing Department, of the two units that existed on the properties within the last five years, one unit will remain protected by the RSO, one unit must be replaced as an affordable unit, and one unit must be replaced at market rate. The residential unit(s) demolished in 2018 are not covered in this analysis because they occurred more than five years prior to the date of Housing's affordable units determination, October 29, 2025.

E. Add any other applicable entitlements here, such as SPPE (Specific Plan Project Exception), ZAA (Zoning Administrator Adjustment), etc.

It is not clear why the original project's entitlement request for a waiver of dedication is no longer being considered.

Prior VNC letters for same/similar location:

In 2021, the VNC heard the original project proposed under this application, which was significantly different, i.e. 3 stories v. current proposed 4 + 1 story for solar with trellis ceiling, and 9 dwelling units v. current proposed 19 dwelling units, etc. The VNC Board supported the project but only if the underground mechanical room was removed, the entrance to the parking garage and the loading zone were moved from the alley to Main Street, and deliveries were restricted to 8 am to 8 pm. Also, the applicant was to clarify whether the proposed solar structures are compliant with city code and/or mandated by State law:

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

June 23, 2021

By email
Bindu Kannan bindu.kannan@lacity.org

Dear Bindu Kannan:

Please be advised that at a regular public meeting of the Venice Neighborhood Council (VNC) Board of Officers held on June 15, 2021, the following Land Use Planning Committee (LUPC) motion was approved.

Project Description: 1410 -1422 Main Street APCW-2021-2020-CDP-MEL-SPE-SPP-WDI. Demolition of the (2) existing single family dwellings and the construction of a new 3-story mixed use building (commercial + 9 new dwelling units) and a 2-story basement garage on (3) lots.

MOTION: The Venice Neighborhood Council recommends approval of the project with the following conditions:

1. Remove the underground mechanical room
2. Make the entrance/exit the project on Main Street, and the loading zone on Main Street. City to stripe the pavement accordingly.
3. Deliveries not prior to 8am and not after 8pm
4. Applicant to clarify whether the solar structures as proposed are compliant with city code and/or mandated by State law

ACTION

it was approved by a vote of 12-5-1.

Respectfully submitted,

Ira Koslow
President
Venice Neighborhood Council
www.venicenc.org

It's YOUR Venice - get involved!

In 2014 the VNC heard a different Density Bonus project on the site, which was slightly larger. The Board recommended denial of that project due to: excessive incentives requested, inconsistency with the surrounding neighborhood character, mass and scale, applicant's failure to show that the incentives requested were necessary to make the housing units economically feasible, excessive FAR, danger of extremely poor circulation with the parking entrance on the back alley, excessive lot consolidation, no demand management strategy, and unaddressed historic preservation issues. That application was withdrawn in 2015.

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

April 21, 2014

Linn Wyatt
Chief Zoning Administrator
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012-2601

Case Number: CPC-2013-2377-DB-CDP-SPP-MEL
Project: 1414 Main Street, Venice 90291
Description: Density Bonus (Off-Menu) with 5 incentive requests, SPP, CDP, Mello Act compliance review to develop a 46-feet/4-stories, 91,968 square foot, mixed-use development.

To Linn Wyatt,

Please forward the **DENIAL** of the proposed project to the appropriate Zoning Administrator for this project once that person is assigned. This will advise that at a regularly held public meeting of the Venice Neighborhood Council's (VNC) Board of Officers on March 18, 2014, it was moved and passed by the Venice Neighborhood Council as follows:

MOTION:
The Venice Neighborhood Council recommends DENIAL of the project as presented based on:
- Excess of off-menu affordable housing density bonus incentives (five vs. three that are specified by SB 1818).
- Inconsistency with the character, mass, and scale of the surrounding neighborhood
- The applicant's failure to show that the off-menu incentives are necessary to make the housing units economically feasible (especially in lieu of cost to develop 89 excess parking spaces).
- Excessive FAR.
- Danger of extremely poor circulation with the parking entrance onto alleyway Toledo Court (except for residences and employees).
- Excessive lot consolidation.
- Missing transportation demand management strategy.
- Unaddressed historic preservation issues.

ACTION: Motion made by Ira Koslow, seconded by Marc Saltzberg. Motion to DENY the project approved 14-1-1

It's YOUR Venice - get involved!

Photos of existing:

Alley (15′ wide)—from south/Market St. Note: 2 normal sized cars cannot pass.

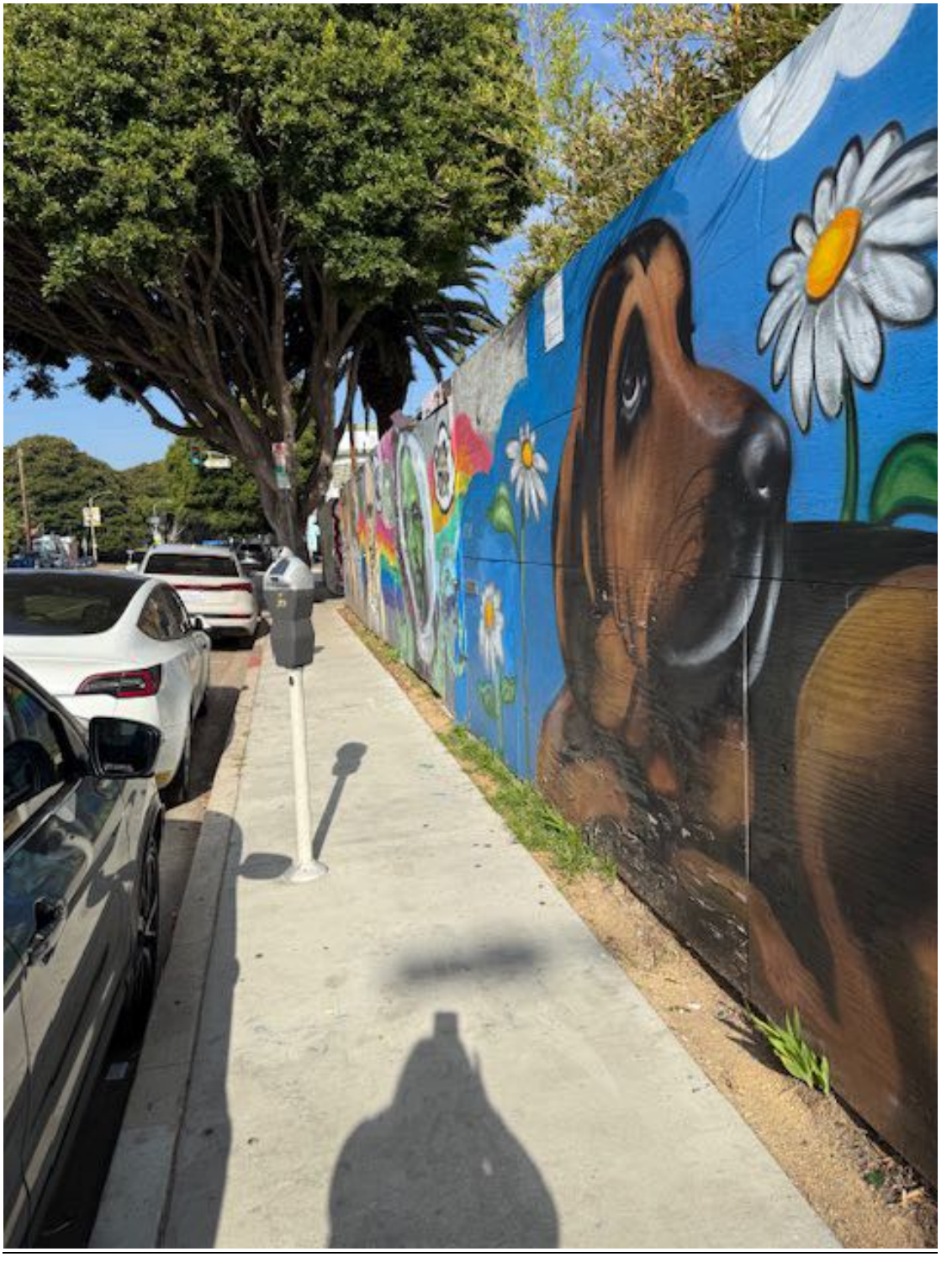


Alley (15′ wide)—from North/Horizon Ave. Note: 2 normal sized cars cannot pass.



<u>Main Street frontage</u>—3 lots between 5-unit apartment building to the left and commercial building to the right.






@PREMO_ejac
an awesome
HUMANBEIN
GREAT
MUSICIAN
IN ART
GET DOWN w/
ANYTHING G
WAS
YOUTH YET
COMPLETELY
SENSITIVE
CARING.
EVERYONE
LOVED MAX
ROCCO

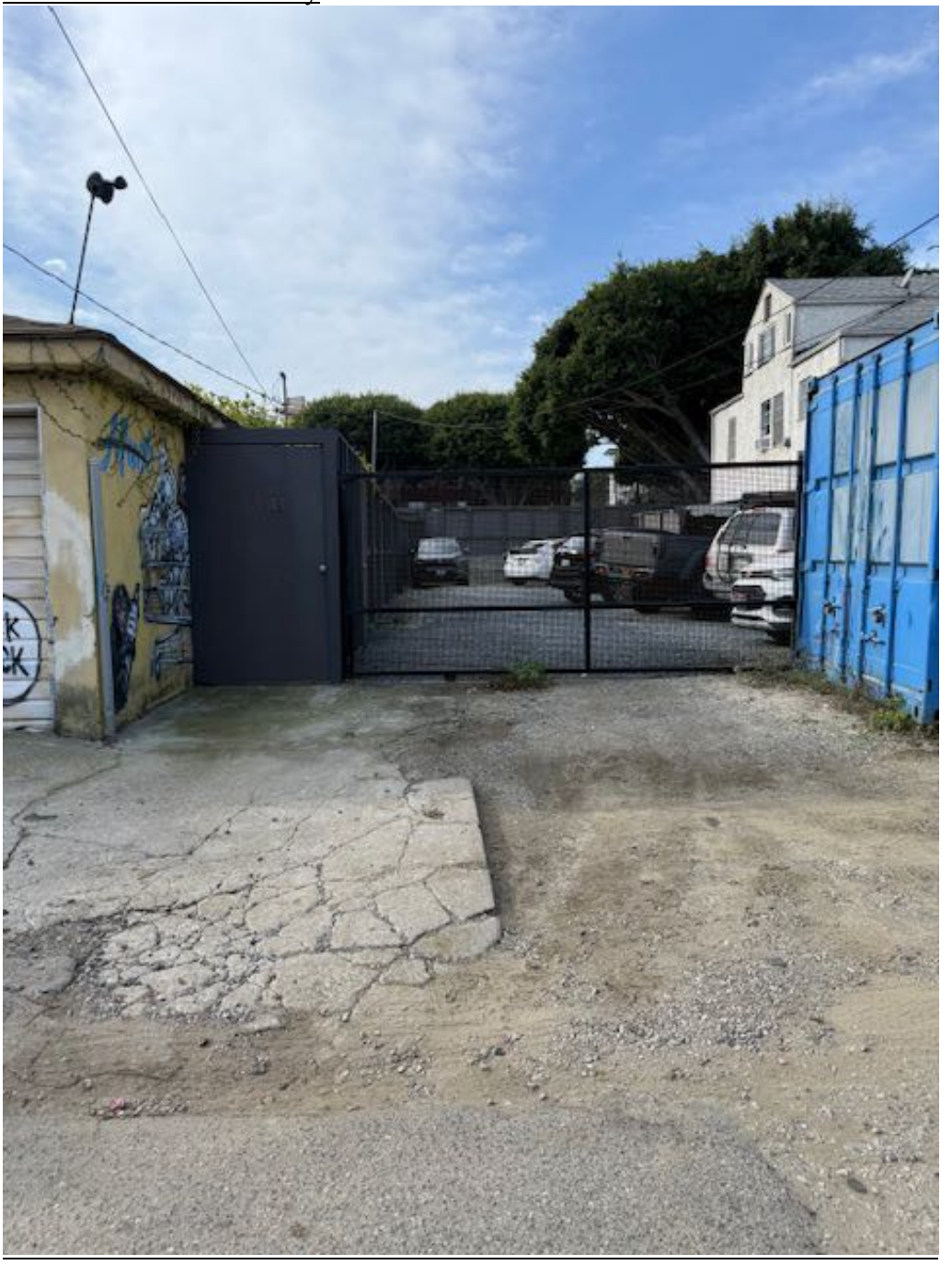
1422 Main St lot from Alley



1414 Main St lot, from Alley



1410 Main St lot from alley



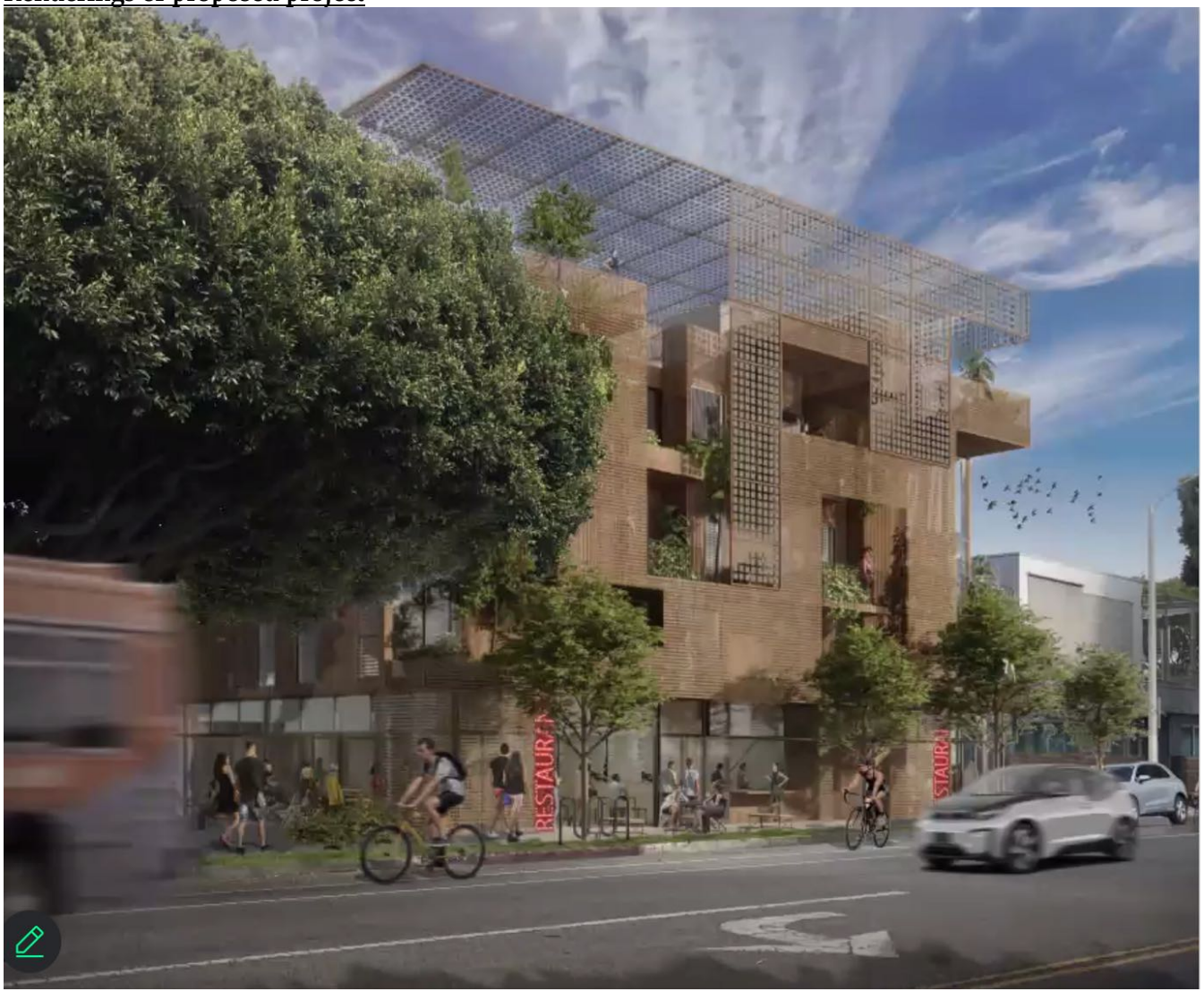
Unpermitted structure in 1410 Main St vacant lot:



I. Existing Site Plan:



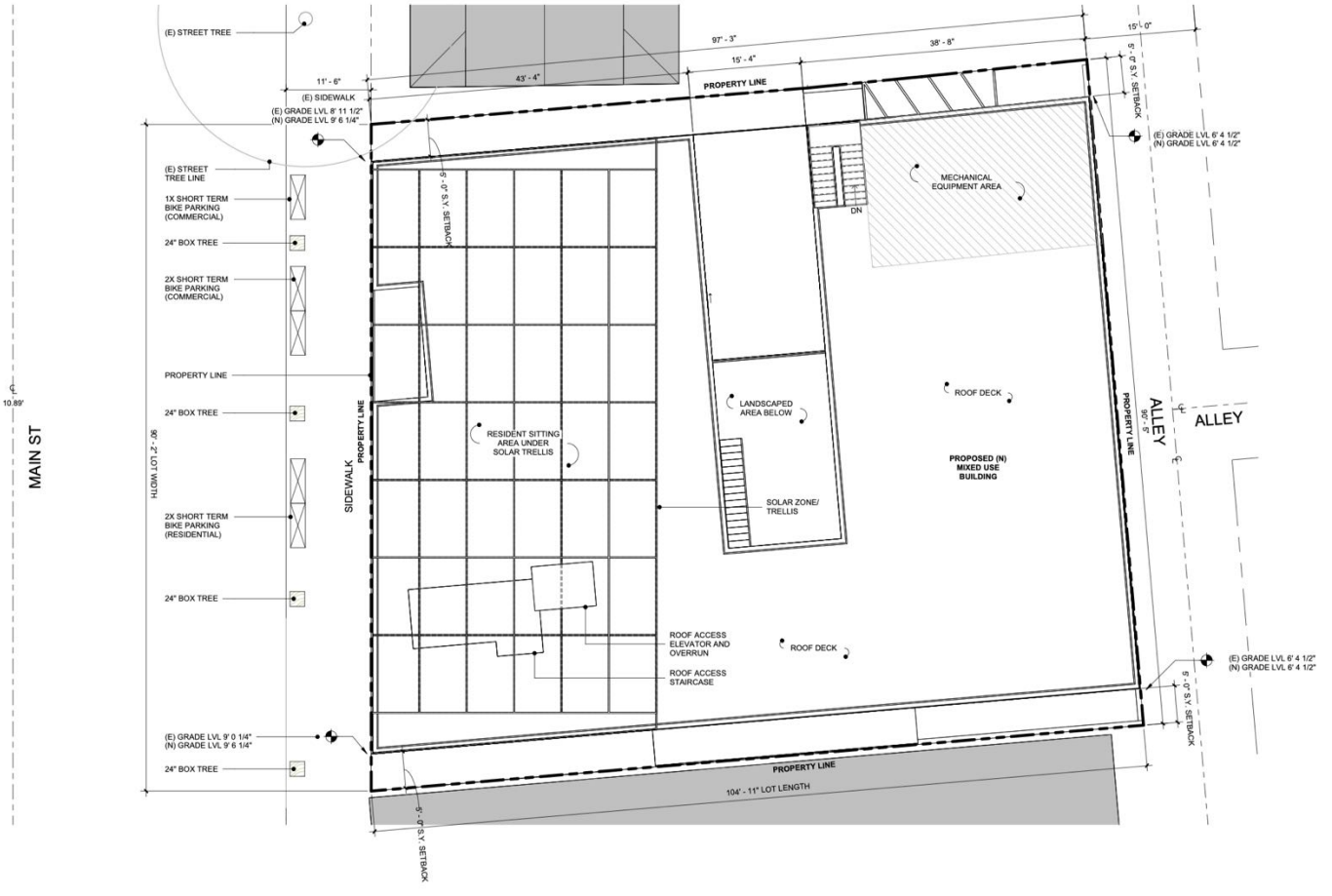
II. **Renderings of proposed project**




MAIN
APTS
RESTAURANT
RESTAURANT


MAIN
APTS
STAURANT
STAURANT

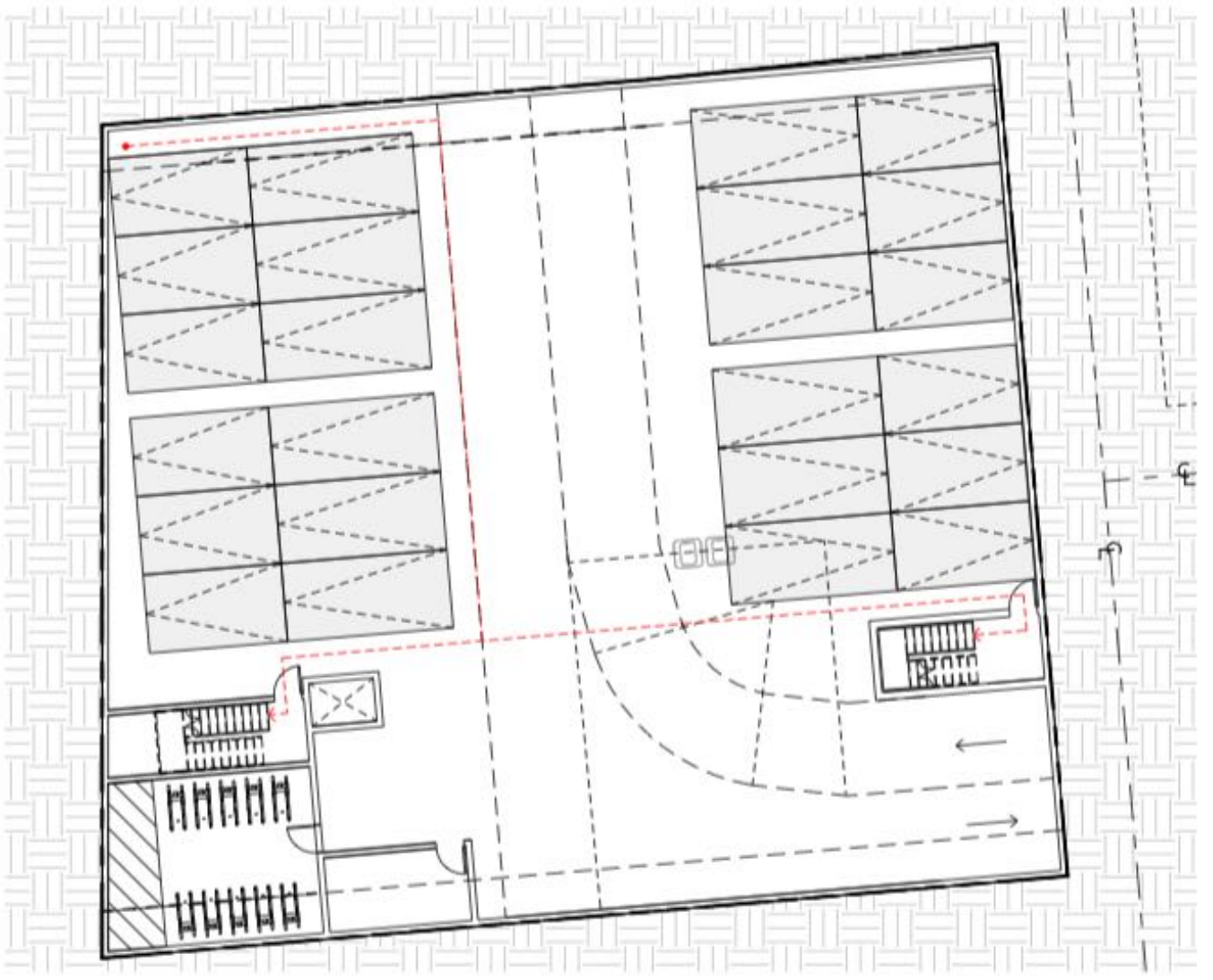
III. Site Plan:



IV. Floor Plans (detail/color)

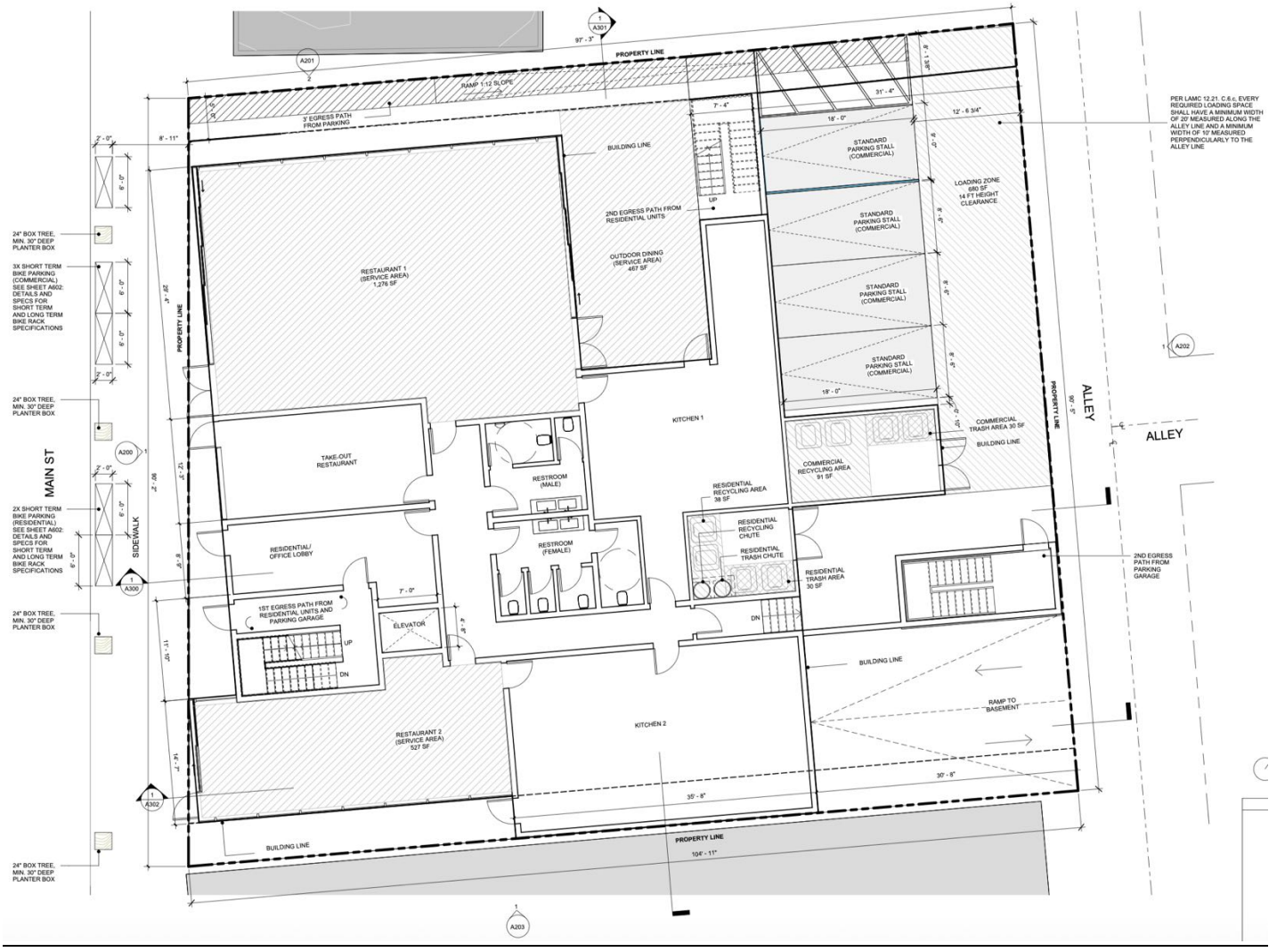
Basement (detail/color). Note 2 tandem parking spaces for each residential unit.





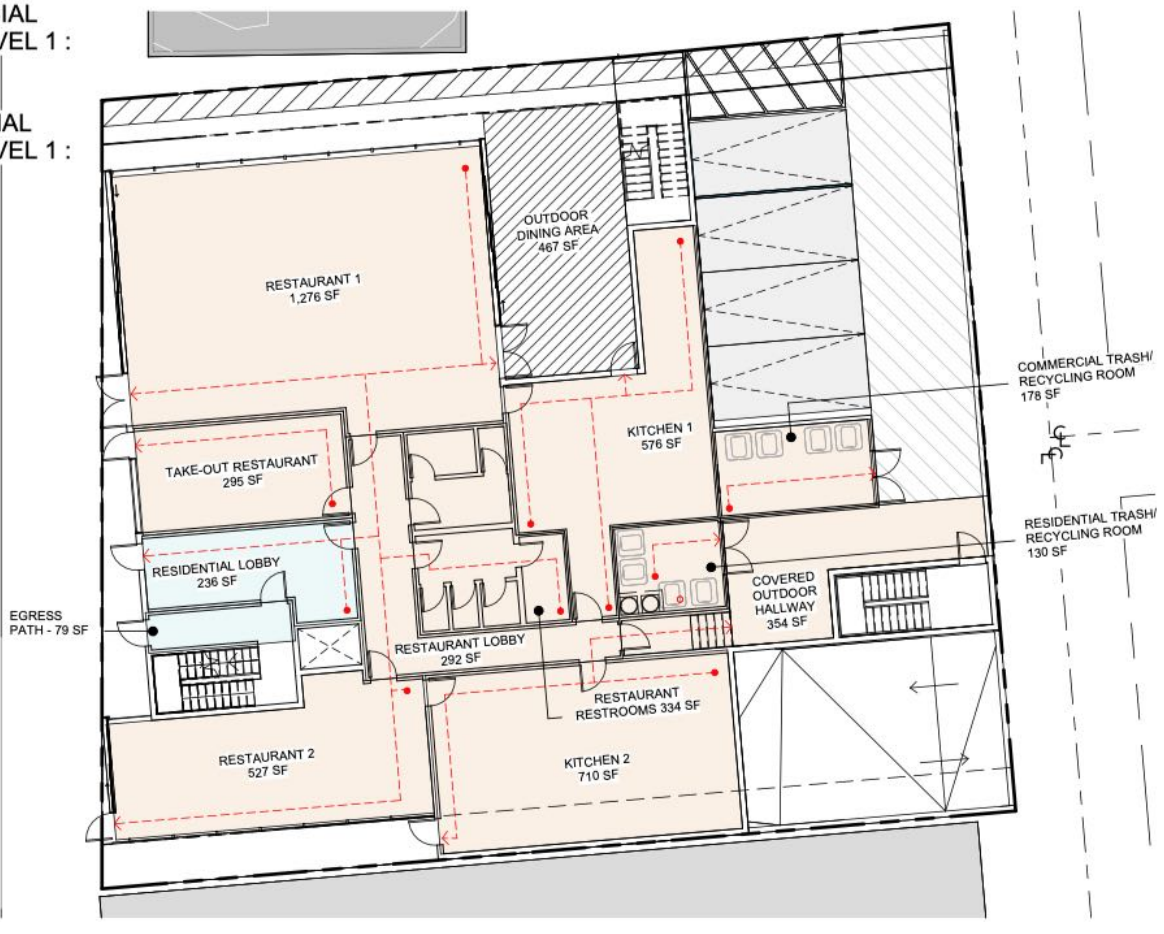
1 LV B1 PARKING - AREA PLAN
1/16" = 1'-0"

Ground Floor Plan (detail/color). Note 4 parking spaces for the restaurant, with loading zone behind.



TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 4,542 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 445 SF



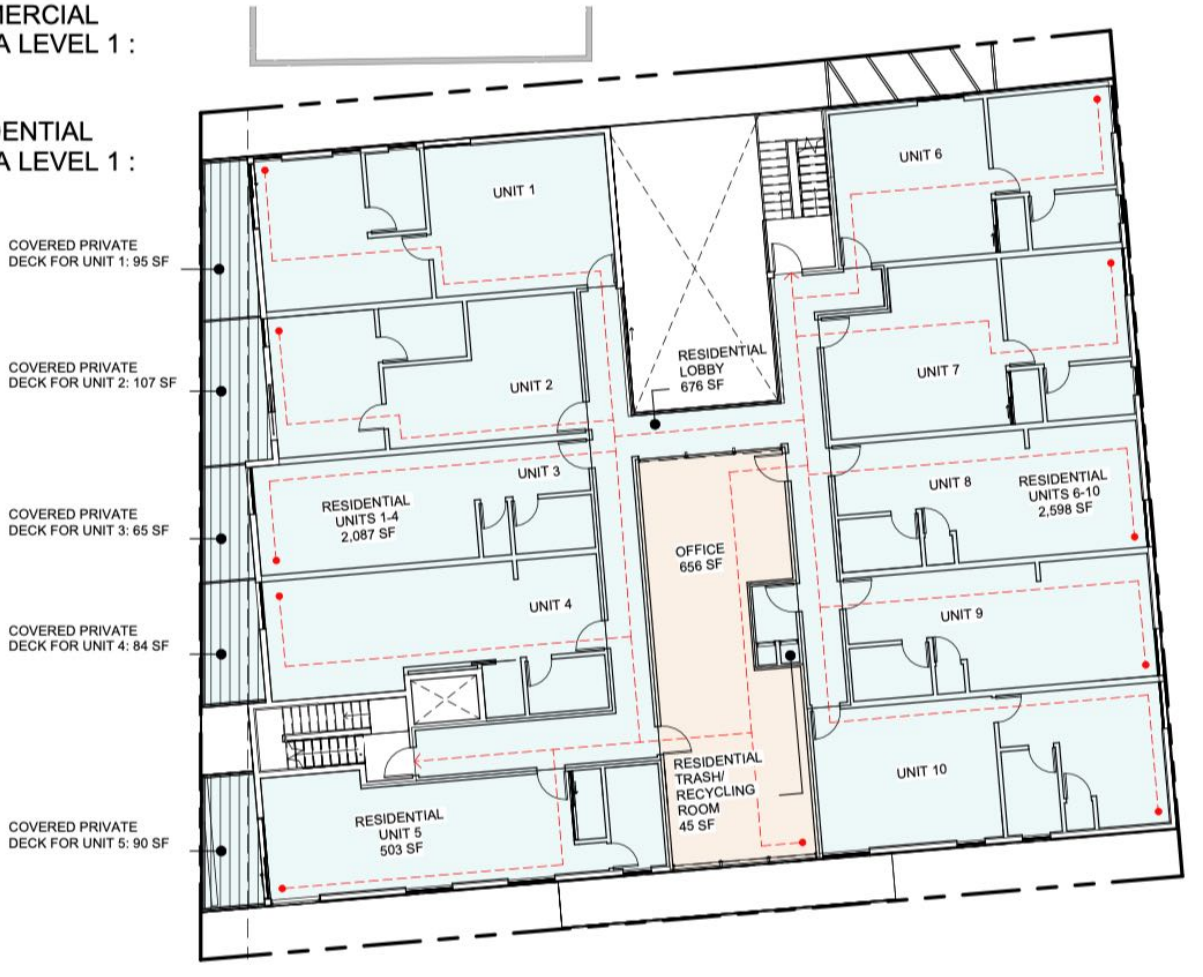
2 LEVEL 1 - AREA PLAN
1/16" = 1'-0"

Second Floor Plan (detail/color)



TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 656 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 6,351 SF



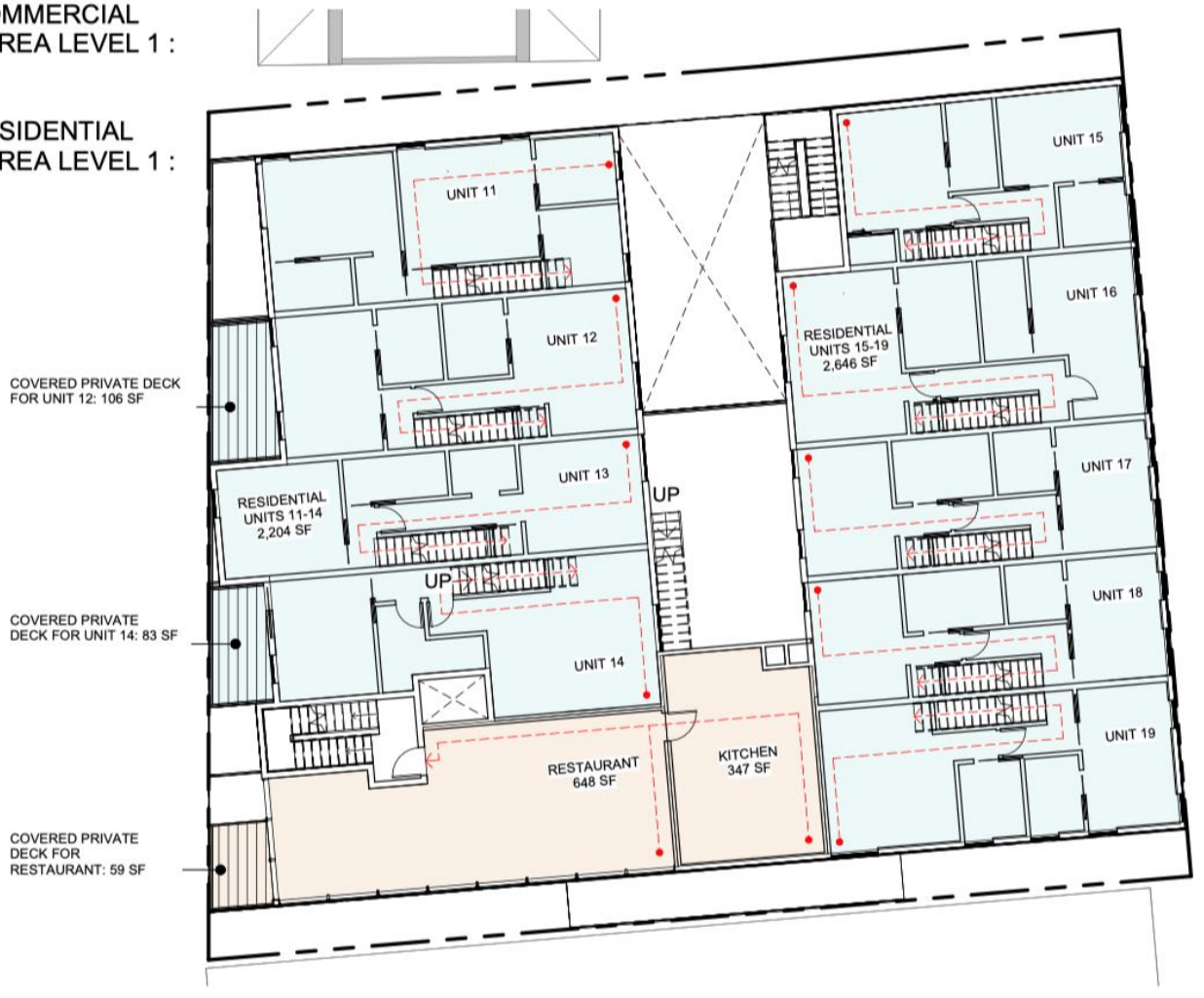
3 LEVEL 2 - AREA PLAN
1/16" = 1'-0"

Third Floor Plan (detailed/color)



TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 1,054 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,035 SF



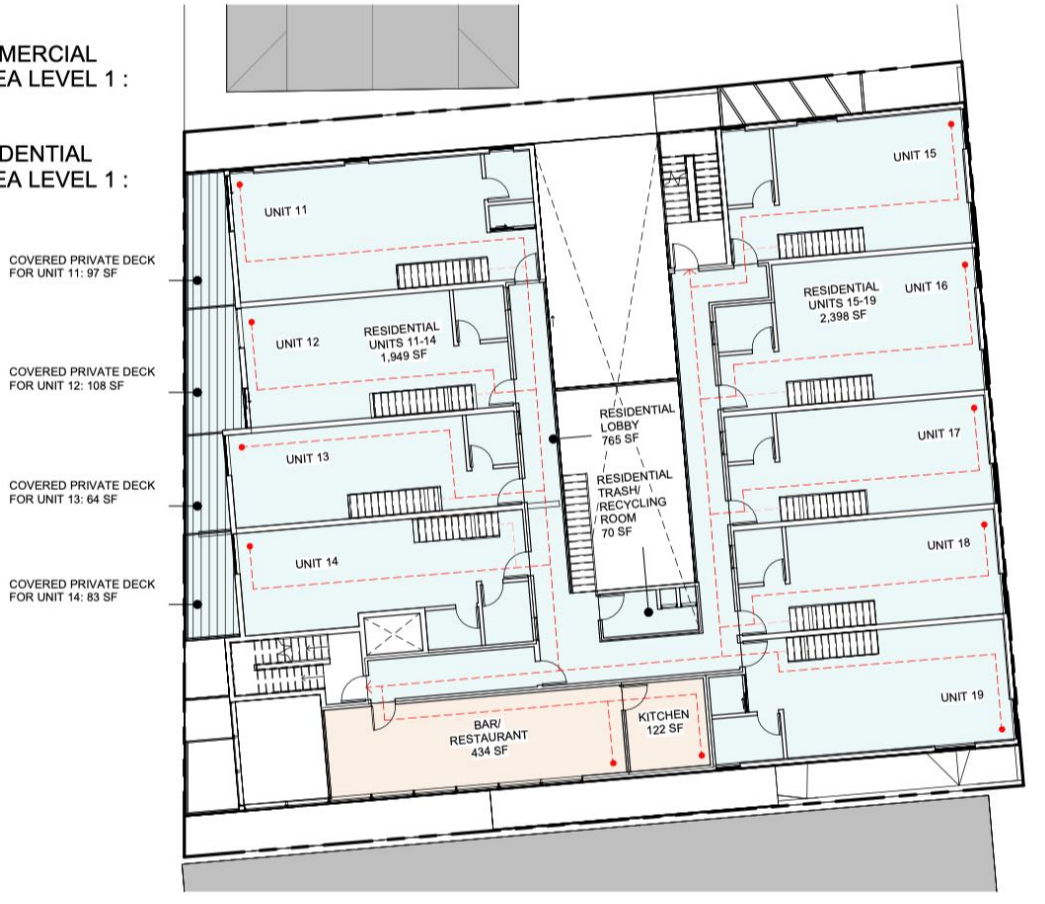
4 LEVEL 3 - AREA PLAN
1/16" = 1'-0"

Fourth Floor Plan (detail/color)



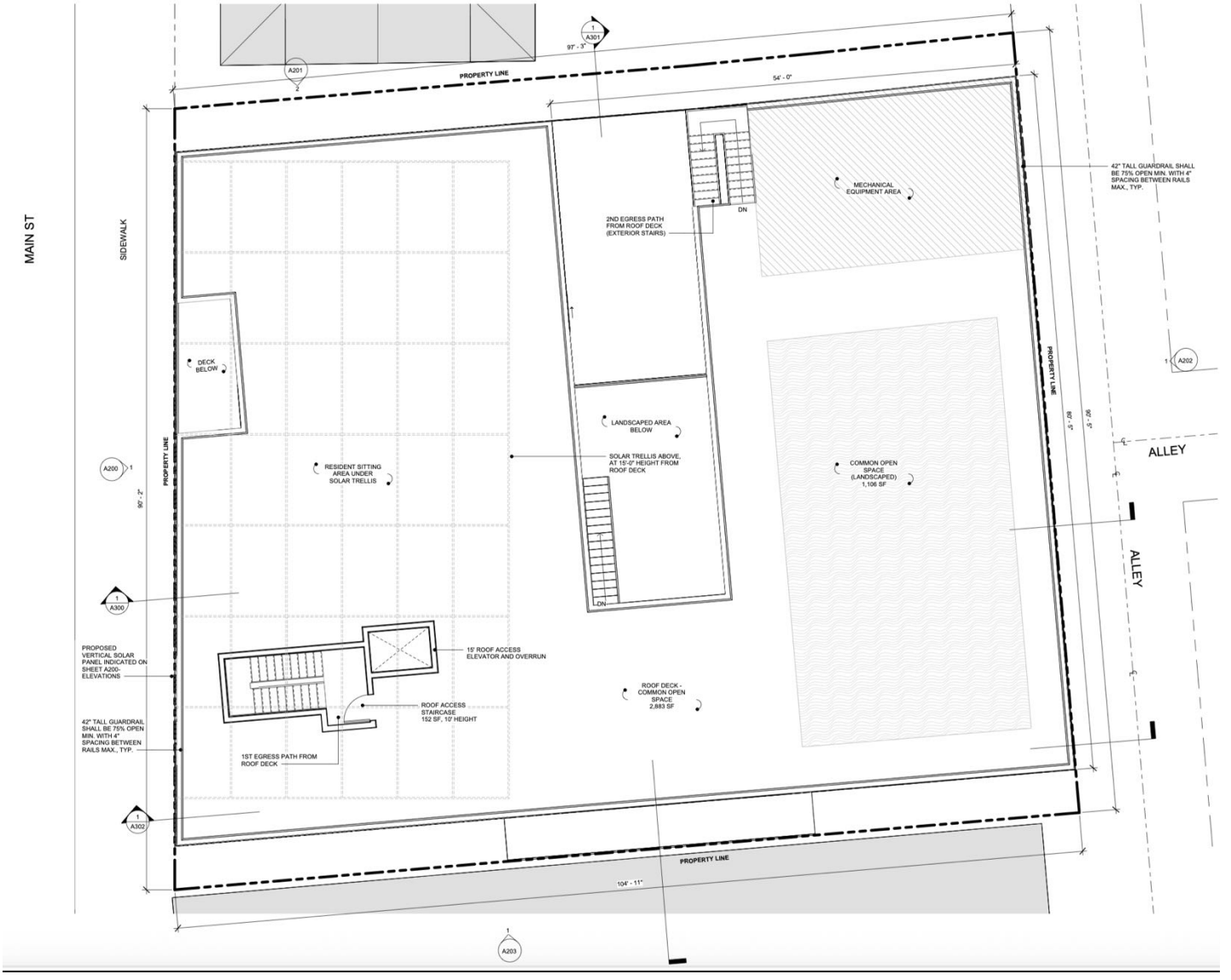
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 556 SF

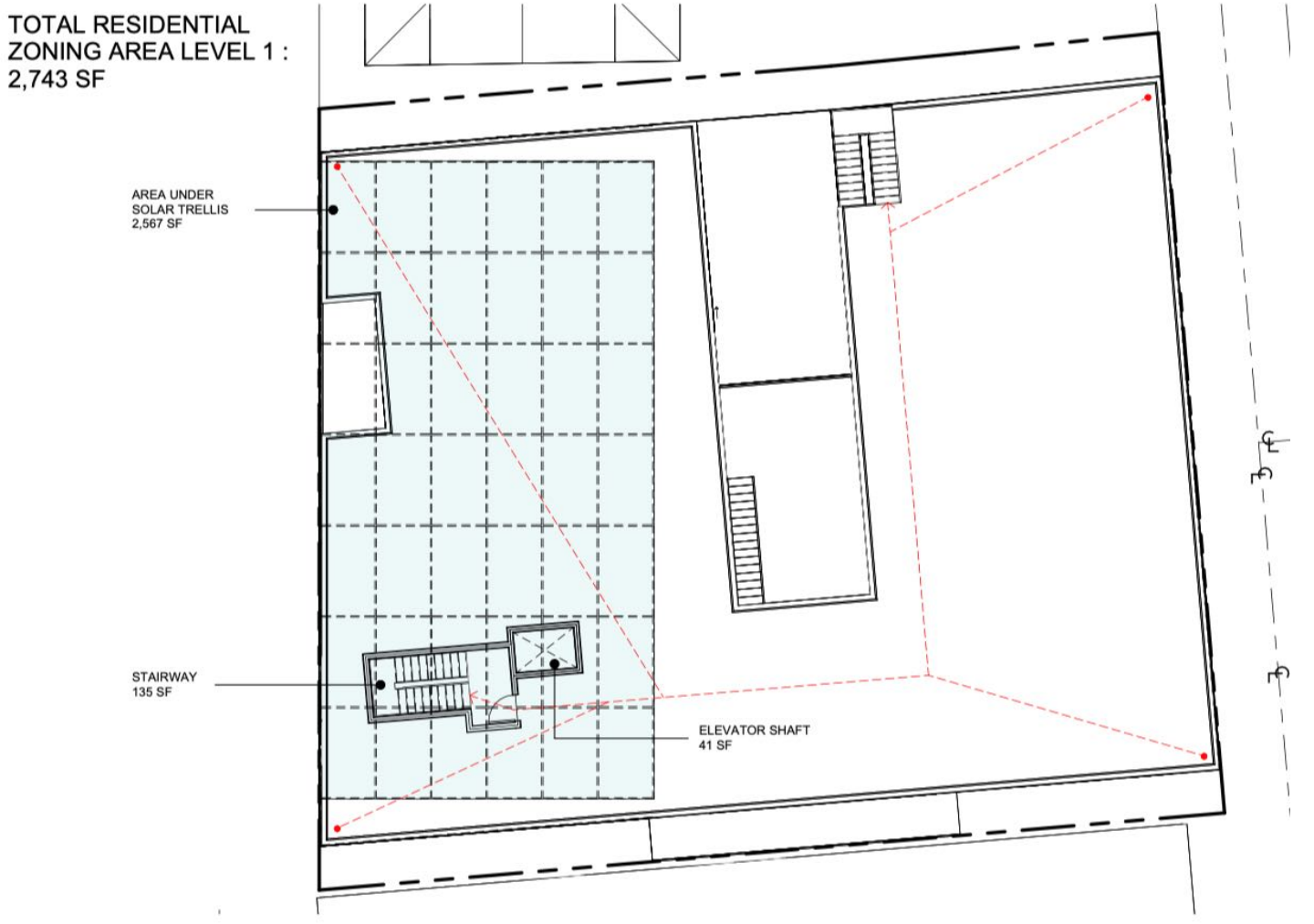
TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,463 SF



5 LEVEL 4 - AREA PLAN
1/16" = 1'-0"

Roof Plan (detail/color)

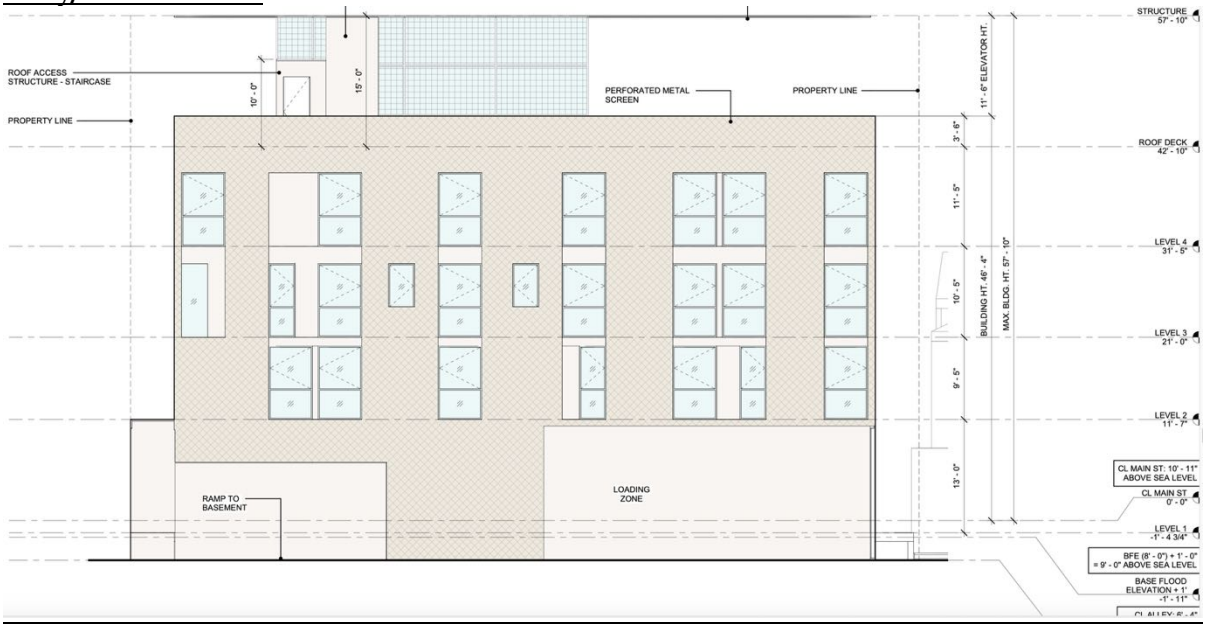




6 ROOF DECK - AREA PLAN
1/16" = 1'-0"

V. Elevations:

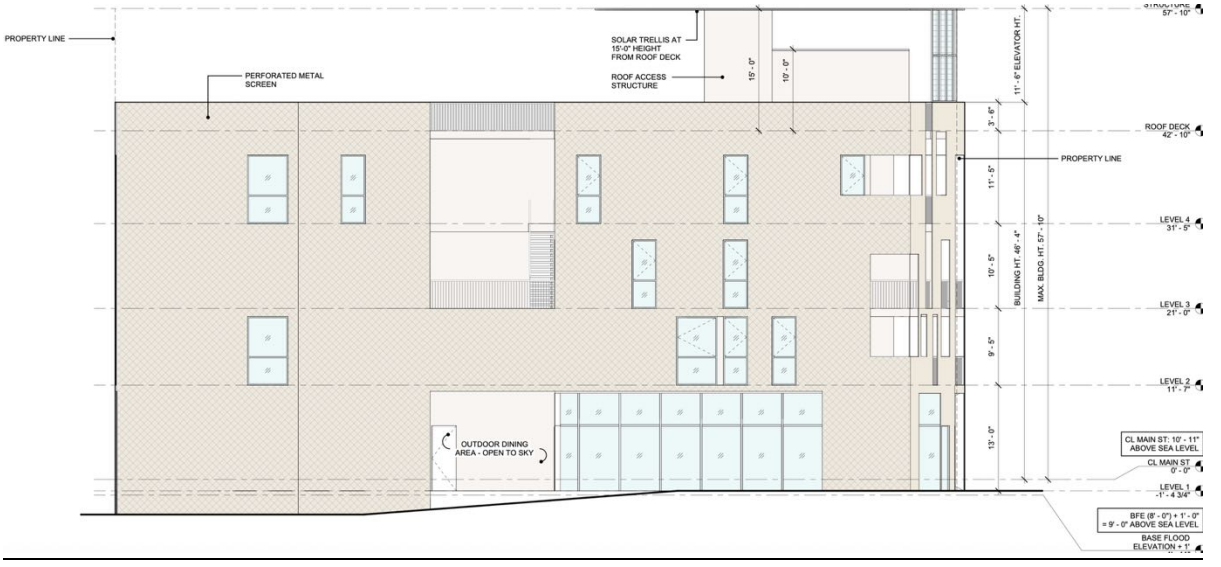
Alley/East Elevation



Frontage on Main Street/West Elevation



North Elevation



South Elevation



ATTACHMENT I

CALIFORNIA WOMEN'S LAW CENTER

Venskus & Associates
A PROFESSIONAL LAW CORPORATION

May 4, 2021

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

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

Dear Los Angeles City Planning Commissioners:

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

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

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

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

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

Adopting a permanent ordinance is an important step to protect housing stock including, specifically, affordable and Rent Stabilized (RSO) housing in the City's coastal zones, and to prevent displacement of people and communities. The ordinance must be in accordance with controlling state law and the Settlement Agreement. As currently proposed, the Mello Act Ordinance is not in accordance with controlling authority and thus exceeds the City's jurisdiction.

I. The purpose of the Mello Act is to preserve residential structures in the coastal zone, to protect existing affordable housing, and to provide new affordable housing

As stated in the IAP, under the Mello Act each local jurisdiction shall enforce three basic rules—

1. maintain existing residential structures,
2. replace converted or demolished affordable units
3. provide inclusionary residential units in new housing developments.

However, by adding clause 12.21.H.c.7. Mixed Use in the draft Mello Act Ordinance, the City is not honoring the first requirement, which states:

> "Existing residential structures shall be maintained, unless the local jurisdiction finds that residential uses are no longer feasible." (IAP pg. 7.)

California courts also have made clear that the Mello Act's purpose is to preserve housing in the Coastal Zone. The Court of Appeal stated that the purpose of the Mello Act is:

> "to preserve residential units occupied by low or moderate-income persons or families in the coastal zone."[1]

The California Supreme Court similarly explained that:

> "[t]he Mello Act supplements the housing elements law, establishing minimum requirements for housing within the coastal zone for persons and families of low or moderate income."[2]

In fact, the Mello Act specifically mentions the housing elements state law, making it clear that the Mello Act is a law that protects housing for all income levels and certainly not one that would allow for non-residential uses. One of the main avenues the Mello Act proscribes for protecting residential housing is to limit the ability to convert existing residential structures to non-residential uses. To allow such conversions would not only violate both the letter and the spirit of the Mello Act, but it would plainly threaten housing, by allowing its destruction for purposes of a more lucrative commercial use, including mixed use projects, thus displacing families and damaging coastal communities that are already holding on by a thread—exactly what the Mello Act was intended to prevent.

[1] *Venice Town Council v. City of L.A.*, 47 Cal. App. 4th 1547, 1552-53 (1996).
[2] *Pacific Palisades Bowl Mobile Estates, LLC v. City of Los Angeles*, 55 Cal. 4th 783, 798 (2012) (emphasis added).

The Mello Act states:

> "The conversion or demolition of any **residential structure** for purposes of a nonresidential use which is not 'coastal dependent,' as defined in Section 30101 of the Public Resources Code, shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."

This language is repeated in IAP section 4.1 (also covered in the Settlement Agreement, section VI.C.1.):

> "The Mello Act states that the Demolition or Conversion of **residential structures** for the purposes of a non-Coastal-Dependent, non-residential use is prohibited, unless the local jurisdiction first finds that a residential use is no longer feasible at that location."

II. As proposed, the draft Mello Act Ordinance exceeds the City's jurisdiction and violates the Settlement Agreement

The draft Mello Act Ordinance exceeds the City's jurisdiction. Under article XI, section 7 of the California Constitution, "[a] county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws."[3] The Mello Act is a state statute; therefore, any attempt to enact an ordinance in conflict with it is in excess of the City's authority.

The City must also comply with the Settlement Agreement in enacting the Mello Act Ordinance. The permanent ordinance must be consistent with both the Mello Act and the provisions of the Settlement Agreement. Adopting an ordinance that is contrary to the provisions of the Settlement Agreement would be in violation of the Settlement Agreement itself.

III. Words have meaning: terminology in land use law is specific

The draft Mello Act Ordinance new proposed provision (LAMC 12.21H.c.7.) for conversion to mixed uses changes the meaning and application of the Mello Act by stating:

> "Mixed Use Development. A proposed mixed use development may not result in a net reduction in the total number of existing Residential Units unless a residential use is no longer feasible. A mix of uses is permitted, so long as the structure provides all required Replacement Affordable and Inclusionary Units."

This new provision would allow for the conversion of one hundred percent residential structures to non-residential mixed uses and by doing so, change the meaning, spirit, and purpose of the Mello Act. This change is in direct violation of the Mello Act and the Settlement Agreement, which explicitly forbid the conversion of a residential structure to a non-residential use.

[3] *Sherwin-Williams Co. v. City of L.A.*, 4 Cal. 4th 893, 897 (1993).

This new conversion provision included in the draft Mello Act Ordinance essentially changes the Mello Act, as follows:

> "Conversion or demolition of any ~~Residential Structure~~ **residential unit or residential use**, for purposes of a non-residential use that is not Coastal-Dependent, is prohibited, unless a residential use is no longer feasible at that location."

This new provision has the effect of replacing the word "structure," as used in the Mello Act, the Settlement Agreement and IAP, with "unit or use." The words "structure" and "unit" are not interchangeable. Nor are the words "unit" and "use." The word "structure" refers to an entire building as an entity, while the word "unit" refers to an individual dwelling, which may be one of many within a single structure. This is an important distinction, because the use of the word "structure" in both the Mello Act and the IAP intentionally protects the entire residential building.

The terminology used in land use law is specific and purposeful. The use of "unit" in the Mello Act pertains to sections of the law related to protecting existing affordable housing or providing inclusionary affordable housing, whereas "structure" relates to the protection of housing from the desires of developers for more lucrative commercial uses, including mixed use.

A residential structure in a commercial zone may also not be changed to a mixed use, as the Mello Act specifically protects housing regardless of zoning. Furthermore, the definition of a "residential structure" does not include "mixed use," which is considered a commercial use and is restricted to commercial zones. A "residential structure," on the other hand, is permitted in both residential and commercial zones. They are far from equivalent. Therefore, the substitution of "unit or use" in the proposed ordinance amounts to a sleight of hand, *apparently to promote the substitution of mixed use structures in place of residential structures*. This was clearly not the intent of the clear and carefully chosen language of the Mello Act, the Settlement Agreement and the IAP.

Municipalities are permitted to strengthen the local implementation of a statute, but not to weaken it. As per the Mello Act, Government Code Section 65590(k):

> …[t]his section establishes minimum requirements for housing within the coastal zone for persons and families of low or moderate income. It is not intended and shall not be construed as a limitation or constraint on the authority or ability of a local government, as may otherwise be provided by law, to require or provide low- or moderate-income housing within the coastal zone which is in addition to the requirements of this section.

The present use of the term, "residential structure" protects an entire building, whereas "residential unit or use" does not, necessarily. It would therefore weaken the implementation of the statute and is thus beyond the jurisdiction of the City.

IV. Conversion to mixed use is used as loophole to allow unpermitted conversions to commercial uses

The result of the change in terminology will destroy housing by allowing for conversion to commercial uses. Replacing the word "structure" with the words "unit" or "use" is beyond the jurisdiction of the City because it contradicts the Mello Act, a state law.

The City's Mello Act Ordinance must also comply with the Mello Act's intent. Since this new mixed use provision would effectively change the meaning, in direct contradiction to the Act's intent, the City would be acting in excess of its jurisdiction.

The harm from the City's attempt to exceed its jurisdiction by allowing conversion or demolition of residential structures for purposes of non-residential use is not just theoretical. Several recent projects have already seized on the current, draft language of the proposed Mello Act Ordinance, regarding "residential units" or "residential uses," to justify approval of the conversion of residential properties to mixed-use properties. Many of these properties have then illegally converted the entire structure to commercial, non-residential use, with no consequence.

Thus, already the use of "units or uses" rather than "structures" has created a loophole to allow developers to convert one hundred percent residential use structures to "mixed use" and then fail to actually maintain any residential uses, in violation of state law and the Settlement Agreement.

A. Example #1: 1214 Abbot Kinney Blvd.

First, for the property at 1214 Abbot Kinney Blvd., in 2014, the City approved a change of use from residential to mixed use, in violation of the Mello Act. Since then the property has been used illegally as commercial office use, even though it was only approved for conversion to "mixed use." Yet another example of ongoing use of residential structures for commercial use is 619-701 Ocean Front Walk, aka Thornton Lofts. When the tech industry moved in they took over residential structures for offices. There are numerous other similar examples of unpermitted mixed uses or full commercial uses where the structures are only permitted for residential use.

B. Examples #2 & #3: 811-815 Ocean Front Walk, and 1310 Abbot Kinney Blvd.

Other Coastal Zone projects are pending that would violate the Mello Act by allowing demolition of 100% residential structures for purposes of a mixed-use development. One example is the project at 811-815 Ocean Front Walk, which proposes the demolition of three residential structures for purposes of a mixed-use commercial development. Another example is the project proposed at 1301-1303 Abbot Kinney, which is requesting a change of use from a 100% residential triplex structure to two live/work mixed use units. The approvals of both of these projects have been appealed. If these projects are ultimately approved by the City it will be in clear violation of the state Mello Act and the Settlement Agreement. There are other examples where the City approved a residential structure to be replaced by "artist in residence" use, a mixed use, but they do not meet the code's definition of artist and thus the structures have become essentially all commercial use.

C. Example #4: 1047 Abbot Kinney Blvd.

One final example is the three bungalows at 1047 Abbot Kinney Blvd., which have certificates of occupancy as residential units but have for years been illegally used for a non-residential use. The City recently approved the demolition of those bungalows for purposes of the Venice Place mixed use project, for which they will be covered by the hotel's CUB, and they will be included in the hotel buildings, very likely losing their identity as housing.

These examples illustrate that because the as-now-proposed Mello Act Ordinance provisions regarding conversion to mixed use contradict the Mello Act's language and intent to protect housing, developers have exploited, are currently exploiting, and will likely continue to exploit this "mixed-use" loophole to effectively destroy residential housing, including and especially affordable housing for low-income residents and communities of color, thus causing a gross, unacceptable, adverse cumulative impact on housing, including affordable housing, in the Los Angeles Coastal Zones.

All of this is an unfortunate, perhaps unconscious, continuance of the City's practices of institutional racism.[4]

V. If not amended, the draft Mello Act Ordinance will disproportionately harm low income communities of color in the Coastal Zone as new mixed use development will be encouraged

The impact of the destruction of housing that has and will continue to result from the Mello Act Ordinance if the ability to convert residential structures to mixed uses is not eliminated, disproportionately harms communities of color. In 2017, California had nearly two million rent burdened households of color that spent more than thirty-percent of the household income on rent and utilities.[5] There were also 1.6 million extremely low-income renter households, two-thirds of which were households of color.[6] During the COVID-19 pandemic, there has been a disproportionate financial impact on populations of color, which has created even greater disparities.[7] All housing will be put in jeopardy in the Coastal Zone if the draft Mello Act Ordinance is not amended to prohibit demolition or conversion of residential structures for purposes of mixed use developments, and those who will be impacted most are low-income people and communities of color.

This is especially true because by allowing such mixed use developments to replace residential structures the current draft of the Ordinance actually encourages, rather than discourages,

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[4] On top of these egregious practices, the City has a pattern and practice of using the rent paid by existing unpermitted commercial uses (this was done for 1301-1303 Abbot Kinney and 1047 Abbot Kinney, among many others) to determine whether affordable housing must be replaced, a a gross double violation of the Mello Act and a practice that the City must never allow, and yet it openly does allow it.

[5] AMEE CHEW & CHIONE LUCINA MUÑOZ FLEGAL, POLICY LINK, FACING HISTORY, UPROOTING INEQUALITY: A PATH TO HOUSING JUSTICE IN CALIFORNIA 14 (2020), https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf.

[6] *Id.*

[7] *See* Kelly Anne Smith, *Covid and Race: Households of Color Suffer Most From Pandemic's Financial Consequences Despite Trillions in Aid*, FORBES (Sept. 17, 2020), https://www.forbes.com/advisor/personal-finance/covid-and-race-households-of-color-suffer-biggest-pandemic-consequences/.

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

VI. Conclusion

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

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

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

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

Sincerely,

Amy Poyer
Senior Staff Attorney

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

Sabrina Venskus
Partner

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

SECONDARY SUBMISSIONS

UNIVERSITY PARK
HISTORIC PRESERVATION OVERLAY ZONE
EST. MARCH 22 2000 BY ORDINANCE #173160

UNIVERSITY PARK H.P.O.Z. BOARD

CHAIRPERSON, JEAN FROST
VICE-CHAIRPERSON, JANICE ROBINSON
SECRETARY, JIM CHILDS
TREASURER, DAVID RAPOSA
JOHN KALISKI A.I.A.

COPY

UP-H.P.O.Z. BOARD
ARCHIVES

Date: March 05, 2026
Subject: UP-HPOZ Historic Resources Survey's errors and omissions.
Requested: Adams Dockweiler Historic Organizing Committee A.D.H.O.C.
Send to: L.A. City Planning Commission

Los Angeles City Planning Commission
Public Hearing: March12, 2026
Los Angeles City Hall / John Ferraro City Council Chamber
200 North Main Street , L.A. Calif. 90012

RE: Item No.1: DIRECTOR'S REPORT AND COMMISSION BUSINESS
Items of interest: Follow-up regarding University Park HPOZ historic resource survey.

Honorable Planning Commissioners,

First, on behalf of the University Park community let me thank you all for having this item scheduled for your review and comments. Our community was understandably disappointed by your collective decision to deny our Appeal by the West Adams Heritage Association (Case No. DIR-2005-0688-BSA-1A / 12-16-25).

However, your individual trepidations about our community's abuse from unacceptable impacts to our existing historic fabric caused by the initial errors in the original survey were a critical action. Your interest in the Planning Department's policy and practice failures of our HPOZ Survey's compromised integrity, has been warmly welcomed and has given us hope for the future.

As the historic preservation steward who serves as the UP-Board's archivist
I am forwarding to the Commissioners some substantive materials of fact from our records which will supply the chronology and context of the complex issues that have transpired over many years.

Given the voluminous nature of the materials, they are divided into two chronological groupings. The data found in the attached Exhibit A concerns the early issues around the inception of the draft Survey circa 2000. The Exhibit B materials center on the period circa 2011 when the

UP-HPOZ Board took unilateral action and began their own updating of the problems of the Non-Contributing historic structures .

Please note that the materials being forwarded in this missive do not constitute the complete file on the UP-Boards actions regarding corrections to the University Park Historic Resources Survey. There have been numerous additional interactions with Planning staff over the years that further illustrate the intrenched position of the Department. Those meetings were typically the Board asking for help and the Department's response that the problems require costs and staff time that could not be made available because of their current overloads.

The years of noncooperation by Planning staff and their refusal to even discuss the Hancock Park resolution as being applicable to University Park keep open a flawed process that eventually allowed the unwarranted demolition of a historic 1905 Bungalow at 1015 West 21st Street. This tragedy was the first demolition of a historic structure from the period of significance which the UP-Board's actions could not prevent.

There are over 100 historic structures that were inaccurately identified as Non-Contributors by the Myra Frank & Associates Historic Resources Survey because of its false use of an "economic miracle" evaluation. Planning Staffs failure to make the necessary corrections have left over 100 historic structures vulnerable to speculative developers. This situation is becoming a crisis with the passage of new state laws that allow for the dismissal of the protections of identified historic resources because of their Non-Contributing status.

I hope the extensive material I have advanced will allow you the see the context of the UP-Board's plight and the urgency of beginning a correction process.

Respectfully yours,

Jim Childs, University Park H.P.O.Z. Board Archivist
213-747-2526 / jeanjim2341@att.net
2341 Scarff Street University Park LA CA 90007

ATTACHMENTS:

EXHIBIT-A

Exhibit A1: ADHOC-MFA-SRY
Adams Dockweiler Heritage Organizing Committee
Letter: May 05 1999 to Barbara Delvac & Richard Starzak
Myra-Frank & Associates/ LA City Planning
12 pages subject: MF&A Historic Resources Survey errors

Exhibit: A2: ADHOC-LADP-MFA
Adams Dockweiler Heritage Organizing Committee
Letter: August 12, 2000 to Herb Glasgow
L.A. Department of City Planning
1-pages / subject MF&A Historic Resources Survey errors

Adams Dockweiler Heritage Organizing Committee

Letter: August 30, 2000 to Herb Glasgow
L.A. Department of City Planning
2-pages / subject MF&A Historic Resources Survey errors

Exhibit: A3: MFA-HRS
Myra-Frank & Associates-Historic Resources Survey
Acknowledgements page iv, Executive Summary page 2 / 9,10
pages 52, 53 / property profile page/ HR Survey resources table

Exhibit: A 4: CRA-UDP
Community Redevelopment Agency -Los Angeles
Adams Normandie 4321 Urban Design Program
4-pages

Exhibit: A5: UPHPOZ-LADP-MFA
Letter: August 30, 2000 to Herb Glasgow
L.A. Department of City Planning
2-pages / subject MF&A Historic Resources Survey errors

Exhibit: A6: HCK-PK
Proposed Revisions to the Hancock Park Historic Resources Survey
2-pages L.A. Superior Court Case "economic miracle"

EXHIBIT-B

- Exhibit B1: UNIVERSITY PARK HPOZ
  - Letter: April 21, 2005 to the Zoning Administrator
  - on behalf of the University Park HPOZ and Board Archivist
  - Minutes of June 21, 2011 Public Hearing
  - review the first 21 Non-Contributors
- Exhibit B2: 2011 Report On Non-Contributing Structures
  - Inventory I All listings of NC structures
  - Inventory II NC structures from period-of-significance
  - Inventory II-G Group I:1888-1900 / Group II: 1901-1909 / Group III 1910-1920 / Group IV: 1921-1929 / Group V: 1930-1946
  - Inventory III NC not from period-of-significance
  - Special Listings: Structures omitted from the Survey Results Table
- Exhibit B3: UPHPOZ Board Minutes
  - March 01, 2011
  - March 15, 2011
  - April 05, 2011

A D H O C
ADAMS DOCKWEILER HERITAGE ORGANIZING COMMI
P.O. BOX 15881 LOS ANGELES. CALIFORNIA. 90015 (213) RI

DIR-2025-0688-BSA
Exhibit: ADHOC-LADP-MFA

(213) 847-3675

COPY

Herb Glasgow, L.A. Planning Department
Courtyard 3
221 South Figueroa Street
Lo Angeles California 90012

August 12, 2000

RE: University Park H.P.O.Z. / Historic Resources Survey Report

Dear Herb,

I am writing to confirm a course of action regarding the University Park HPOZ Survey based on my most recent conversations with you and Rick Starzak of Myra L. Frank & Associates. I am also attaching a copy of my original comment letter (05/21/99), which was received by you on 05/21/99. My 12 pages of comments dealt in specific detail with errors within the draft document that was known at that time as the "West Adams HPOZ " survey. During the lengthy process of review and approvals by the various decision makers it was agreed by all parties that the corrections I requested would not be begun until after the final approval by LA City Council was achieved.

The City Council has in fact approved the University Park H.P.O.Z. on March 22nd of this year and the time is overdue to begin correcting the draft document. There is some urgency in this matter since there is currently an empowered University Park HPOZ Board that must rely on an accurate document to facilitate their actions under the Ordinance. Additionally there is also a necessity for the issuance of this subject material as a CD-ROM as well as in the hard-copy format.

I request therefore that you, Planning Department Staff, Myra Frank & Associates and the University Park HPOZ Board take immediate actions in correcting and updating this vital document.

Respectfully yours,

Jim Childs, Chair ADHOC
2341 Scarff Street, St. James Park Historic District
University Park Calif. 90007

Cc/ University Park HPOZ Board
Rick Starzak, Myra Frank & Assoc.
Councilman Mike Hernandez, CD#1
Tom Florio, WAHA
Susan Peck, NUPCA

UNIVERSITY PARK
HISTORIC PRESERVATION OVERLAY ZONE
EST. MARCH 22 2000 BY ORDINANCE #171686

DIR-2025-0688-BSA
Exhibit: ADHOC-LADP-MFA

COPY

UNIVERSITY PARK H.P.O.Z. BOARD

JEAN FROST, CHAIRPERSON
JANICE ROBINSON, VICE CHAIRPERSON
JIM CHILDS, SECRETARY
DAVID RAPOSA, TREASURER
JOHN KALISKI A.I.A.

Herb Glasgow, L.A. Planning Department
Courtyard 3
221 South Figueroa Street
Los Angeles California 90012

(213) 847-3675

August 30, 2000

RE: University Park H.P.O.Z. / Historic Resources Survey Report

Dear Herb,

I am writing on behalf of the University Park HPOZ Board to urge you, Planning Staff and Myra L. Frank & Associates to complete any and all revisions to our Historic Resources Survey post-haste. We have received a copy of the Adams Dockweiler Heritage Organizing Committee's 12 page comment letter 05/21/99 and their recent request (08/12/00) to you that this work proceed immediately. Besides those comments that dealt in specific detail with errors within the draft document (known at that time as the "West Adams HPOZ " survey) there is also the question of ongoing updates to the Survey.

It is anticipated that in the course of working with this document over a period of time additional errors or omissions will be discovered. Additionally the physical environment itself will change as development and rehabilitation takes place. The Board also has a two-year time limitation to identify natural Landscape features to add to the database. The Board must be able to utilize the latest technology in their interaction with this material and therefore requests issuance of this subject material as a CD-ROM as well as in the hard-copy format.

The fact that this Survey database is an evolving document should in no way imply that those known necessary corrections should not be made immediately. There is also no logical reason in delaying the transfer of this material to the CD-ROM format. There was understandably a justification for waiting until City Council completed their approval process but that was over 5 months ago. It is

imperative that the Board has an accurate and current document. The University Park HPOZ Board is now at a disadvantage when working with the community. We must explain that every reference in the document is "incorrect" when it states that a property is in the West Adams HPOZ. The ensuing confusion by neighbors effects our outreach efforts at a crucial time. For example, educating our neighbors as to the opportunities afforded them through the Mills Act must be coached with the proviso that; "...when filling out the application please use University Park rather than West Adams".

The authority of the Ordinance itself is undermined when community members must question its' name. The Board's duties include informing the community of their responsibilities to seek proper permits and review under the new HPOZ Ordinance. Their cooperation is impacted when they are given base data that is wrong and they begin to doubt every aspect of the process.

A situation arose at tonight's Board meeting that is illustrative of some of the problems that can result from an improper database; when reviewing a proposed signage project for 2220 S. Hoover the Planning Staff represented the building as a "non-contributor". The Board pointed out that the building had in fact been omitted entirely from the Survey and therefore could not be by Ordinance definition classified as either "contributing" or "non-contributing". This type of conundrum will continue until the Survey is amended. The University Park H.P.O.Z. Board approved the following motions in response to these evening's discussions:

Motion: *That the Board request the Planning Department and Myra L. Frank & Assoc. expeditiously complete revisions to the "University Park Historic Survey".* (UPM083000-13)

Motion: *That the Board request the Planning Department establish an authoritative and expeditious procedure for the evaluation and designation of a structure when it is recognized to have been omitted from the Historic Survey in error.* (UPM083000-15)

The Board would welcome both you and Rick Starzak to meet with us at the earliest opportunity to discuss this further. However we hope that you respond to this request and immediately begin whatever actions are needed to facilitate the process forthwith.

Respectfully yours,

Jim Childs, Secretary / University Park HPOZ Board
2341 Scarff Street, St. James Park Historic District
University Park Calif. 90007

Cc/ Rick Starzak, Myra Frank & Assoc.
David Gay, LADP
Councilman Mike Hernandez, CD#1
Tina Saddington, ADHOC
Tom Florio, WAHA
Susan Peck, NUPCA

DIR-2025-0688-BSA
Exhibit: MFA-HRS

Acknowledgments

Myra L. Frank & Associates, Inc. would like to thank the following individuals and organizations for their assistance with the preparation of the Historic Resources Survey Reports: City Councilmember Mike Hernandez and his staff: Guadalupe Duran Medina; City Councilmember Mark Ridley-Thomas and his staff: John Mohamed; City Councilmember Nate Holden and his staff: Stacey Anthony, Sylvia Lacy, Armen D. Ross, and Louis White; The Department of City Planning: Herb Glasgow and Dan Scott; the Community Redevelopment Agency of the City of Los Angeles: Steven Jones; the Western Heights Neighborhood Association, the Harvard Heights Neighborhood Association, the Adams Normandie Association; the Van Buren Place HPOZ; the West Adams-Chester Place Association; Stevie Stern, Pat Karasick, Natalie Neith, Martin Eli Weil, John Rentch, Michael S. Smith, Gregory A. Stegall, Norma Latimer, Jim Childs, Tom Florio, and Linda Scribner. We would also like to extend our special thanks to Leslie Heumann for the use of her extensive survey files, findings, and research notes.

EXECUTIVE SUMMARY

The information and photographs presented in this volume for West Adams (and two other associated volumes) represent the results of the *Historic Resources Survey* (the "Survey") for the proposed *West Adams Historic Preservation Overlay Zone* (the "HPOZ"). The Survey was undertaken as a result of a City Council Motion[1] sponsored by Councilmembers Mike Hernandez and Mark Ridley-Thomas "to initiate proceedings to establish an Historic Preservation Overlay Zone in the Community Redevelopment Agency's Adams-Normandie 4321 Redevelopment Area within the boundaries of Council District 1..."[2]The Survey is under the jurisdiction of the Department of City Planning and Cultural Heritage Commission, and was completed in accordance with the procedures set forth in Los Angeles Municipal Code (LAMC) §12.20.3 E. The Survey was conducted between September 1, 1998, and December 31, 1998, by Richard Starzak, Barbara Hoff Delvac, and Gail Miller of Myra L. Frank & Associates, Inc. (the "Consultant"), all of whom meet the Secretary of the Interior's qualifications in architectural history (Federal Register, Vol. 48, No. 190, pp. 44738-44739, September 29, 1983).

The area surveyed comprises forty-one blocks with 620 developed parcels; it is bounded by the Santa Monica I-10 Freeway and West Washington Boulevard on the north, West Adams Boulevard and West 24th Street on the south, Hoover Street on the west, and Figueroa Street on the east, with the exception of the Doheny campus of the Mount Saint Mary's College.[3] (Figure 1). These boundaries were established by the Department of City Planning in conjunction with the neighborhood association south of the freeway, and they are not based on the full extent of the historical development of the area. Information gathered by the Survey indicates that the historical development of West Adams originally extended south to Jefferson between Vermont and Figueroa. Furthermore, previous surveys indicate that buildings of similar architectural character are located in areas adjacent to the survey boundaries.[4] The areas outside the survey boundaries were not included in the Survey for possible HPOZ designation.

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[1]City Council File No. 98-0199.

[2]The City Council Motion was adopted February 3, 1998.

[3]The Doheny campus of Mount Saint Mary's College was originally the exclusive subdivision of Chester Place. Although it is linked architecturally and historically to adjacent neighborhoods within the West Adams HPOZ, it was excluded from the boundary because of its institutional use.

[4]These areas were surveyed for cultural resources as part of the South Central District Plan (1995) for the Department of City Planning and as part of theAdams-Normandie 4321 Redevelopment Area (1980-81, 1990, and 1992-1993) and as part of the Hoover Redevelopment Area (1986) for the Community Redevelopment Agency.

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The Survey methodology relied on the historic and architectural context previously established for the larger South Central District Plan area and supplemented by information supplied by neighborhood groups and previous surveys. The Consultant provided site specific construction information, an assessment of current building integrity, and a determination as to whether resources are *Contributing* or *Non-Contributing*. *Contributing* resources include those that meet at least one of the HPOZ criteria [LAMC §12.20.3 E.3. (a)-(c)]. An important sub-category is *Contributing--Altered Structure*, which includes resources built within the HPOZ's period of significance with alterations that appear to be reversible. *Non-Contributing* resources include those that do not appear to meet any of the HPOZ criteria and have age, integrity, or stylistic considerations. The criteria are described in detail later in this volume.

Given the project schedule, the survey emphasized the historic architecture and its relationship to the original development of this section of Los Angeles. There are historical events that later affected the neighborhood that are not discussed in detail in this report. These include the dissolution of racial covenants in Los Angeles and the subsequent role played by African-Americans in preserving the historic buildings, and later government redevelopment programs. The significance of individual buildings may change when additional research is conducted that addresses these issues.

The Survey concluded that the West Adams Survey area meets the criteria for HPOZ designation because the majority of buildings are the original structures from the development of this part of Los Angeles, beginning in the late 19th and early 20th centuries and extending through the early 1930s.[5] The *Contributing* buildings retain their historic design and features depicting the array of architectural styles of the late 19th and early twentieth centuries, including Queen Anne, Folk Victorian, Craftsman and the period revival styles. Several buildings were designed by important local architects and were built for prominent families. These buildings create a cohesive neighborhood of primarily single family residences[6] of architectural distinction that, as a whole entity, meets the HPOZ criteria: the district "possesses historic integrity," it "represents an established feature of the neighborhood," and retaining the district "would help preserve and protect an historic place in the City."[7]

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[5]The portion of West Adams west of Hoover Street was part of the Southern & Western Addition, annexed to the City of Los Angeles in 1896. The area east of Hoover was part of the original Pueblo. After the annex, Arlington Avenue became the city's western boundary.

[6]There are several commercial buildings on Washington and Adams Boulevards and Hoover Street that are included in the West Adams Survey and identified as contributors to the HPOZ.

[7]Los Angeles Municipal Code § 12.20.3 E.3.

Planning CPC <cpc@lacity.org>

Item 1, Directors Report on the University Park Survey

Jean Frost <indiejean@att.net> Mon, Mar 9, 2026 at 2:49 PM
To: Planning CPC <cpc@lacity.org>, Cecilia Lamas <cecilia.lamas@lacity.org>

Please review the transcript form the hearing before the Commission relevant to the need to make technical corrections to the University Park HPOZ survey which has long been promised to the University Park Community.

Jean Frost for
West Adams Heritage Association

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President Lawshe: Item number seven. Moving on to item number eight. Item number eight is case number DIR 2025 688 BSA 1A. The project area is located at 1015 West 21st Street within Council District 1. At this time, we'll hear from Associate Zoning Administrator.

President Lawshe: Mr. Turner.

AZA Jordann Turner: Good morning everybody. Jordan Turner, office of zoning administration. Uh, one second just to check the PowerPoint.

AZA Jordann Turner: Okay.

AZA Jordann Turner: Wonderful.

AZA Jordann Turner: Uh, Jordan Turner, Department of City Planning offices and administration, with your staff from LADBS and hopefully the staff in the audience as well. Uh, staff from OER who will be available for any questions. Uh, as mentioned, this is an appeal of zoning, zoning administrator's determination. Uh, the labs do not air or use their discretion in its determination to issue permit number 24 19100002156 for a demolition of an existing one story, single family dwelling. So just a little bit of background on the project site is located at 1015 West 21st Street within the University Park Historic Preservation Overlay Zone. Uh previously was developed with the single family dwelling. Uh, and it was listed as a non-contributor. Currently, the site is developed with a three story, six unit affordable project. Uh, and just to provide a little more for the project timeline, uh, development of this site has been contemplated since July 2023. Uh, an administrative letter of compliance was issued in May 24th for the project development. Uh, the development. The demolition permit was issued in June 2024, which was subsequently appealed. Building and safety issued their determination on appeal in January 2025. That was subsequently appealed to myself, and I held the hearing in April 2025 and and here we are today in December 2025, which is an appeal of my decision. So in essence, this is basically the third bite of the apple.

AZA Jordann Turner: Uh, as mentioned, this project was developed under ED 1. Um, I guess in all irony, the Ed one has been issued by the mayor, rescinded by the mayor, and now has become permanent ordinance. Uh, during the lifetime of this project, uh, the purpose of the ED1 one previously was to expedite, uh, permit clearances for 100% affordable, uh, and temporary shelters. Uh, as mentioned, was originally issued in December 2022, with three subsequent revisions.

AZA Jordann Turner: The final revision added guidance regarding eligibility and precluded projects within historic preservation overlay zones, amongst other areas. However, this demolition permit was issued before that last revision.

AZA Jordann Turner: So in summary, the determination itself, um, my determination found that LADBS did not err or abuse their discretion in issuing the permits. Um, regarding the appellants claims, um, it is a summary and the full appeal. It is located within the commission packet. Uh, the demolition permit, according to the appellant, violates the University Park Historic Preservation overlay Zone. Uh, the the city is demolition ordinance as well as processing requirements of the Eb1 directive. As long as does not meet the National Park Service guidelines. Uh, they feel the permit. The permit is void because it was not issued without a

certificate of compatibility as required by the University Park HPOZ, uh, and did not also follow the uh demolition application ordinance. Uh, and also, as mentioned, information from the appellants that the subsequent um to the original one uh, revised the directive which would have made all these issues. Uh. Additionally that the demolition is a part of a larger project.

AZA Jordann Turner: So in response. Um, after the hearing, um, labs did follow the proper protocol and issued a demolition permit. Excuse me. Uh, maintaining, including obtaining all the necessary approvals from the Department of City Planning. Uh, and the permit was reviewed in accordance with all applicable regulations confirming compliance with the relevant regulations. So, as mentioned, this was issued during a time in which ED1did not exempt projects within, uh, historic areas.

AZA Jordann Turner: So in conclusion, um, as mentioned, the subject development permit was issued within between July 12th, 2023 and July 1st, 2024, and the project was eligible for the ED1 ministerial approval process and thereby, except exempt, from secret review. So my recommendation is that the Commission deny the appeal and basically sustain my decision. Um, I'm here available for any questions. Thank you guys very much.

President Lawshe: Okay. Thank you. At this time we'll hear from the appellant.

President Lawshe: Please approach the podium.

President Lawshe: Okay, so I have two speaker cards. You will each have one minute.

Appellant Jean Frost: Uh, the appellant is asking for seven minutes as the appellant. And to go with the power. Yes.

President Lawshe: I'm sorry.

Appellant Jean Frost: Yes.

Cecilia Lamas (CPC Assistant): That is correct. Um, this is the building, and you.

President Lawshe: Have your seven minutes.

Appellant Jean Frost: It may be less, but let me know when you're ready.

President Lawshe: Okay. And that's that's seven total minutes for me.

Appellant Jean Frost: And then, uh, neighborhood council comment for.

President Lawshe: Well, neighborhood council is separate.

Appellant Jean Frost: Yeah.

President Lawshe: Yes. Please proceed.

Appellant Jean Frost: Okay. My name is Gene Frost. I'm vice president of the West Adams Heritage Association. I'm representing also co-appellants Sarah Ellis, who is a property owner, and Jim and Janice Robinson, who are property owners on the block. Um, University Park is a

very special place. Uh, CRA surveyed it with SHPO compliance in the 1980s. Um, the city has declared it a historic preservation overlay zone with an adopted preservation plan. Uh, it is a very significant area. There are three National Register districts and over three dozen historic cultural monuments in the vicinity. I mention this background to emphasize how important processes are, and protection and compatibility is for the historic neighborhood, which did not occur in this process in spite of the efforts of a very talented staff. Um, the map of the survey, um, is this is for the University Park HPOZ. It was done in 1999. It was done by Myra Frank at the time, and when it went before city Council, Robert Duenas, planner, said that they would revise the defects that were in the survey. The defects were never revised, and as a result, noncontributing structures within the survey continued to be mislabeled and considered noncontributing. They were supposed to be revised 25 years ago. This is the survey page for the 1905 Craftsman Building, and, uh, it was considered a non-contributor. But the preservation plan in University Park gives special consideration for non-contributors that are from the period of significance. This 1905 craftsman ought to have had additional consideration, and that is a picture of the current site.

Appellant Jean Frost: And that is a picture of the survey page. And as you see when the survey was done, there were contributors non-contributors and contributor altered. There is a fatal flaw in the Myra Frank survey, which also existed in the Hancock Park survey done by the same consultants, and that is they used as their bar to determine contributing noncontributing a financial miracle standard, that is, that it would cost so much to return it to character defining features that it is a non-contributor. The Superior Court in Hancock Park found that this was not an acceptable bar for a survey, and the city revised the Hancock Park Survey. They did not revise the University Park survey that suffered the same problems. And as you see, myra rank in the city were notified very early on of these defects. Um, the University Park Preservation Plan required special consideration for a 1905 building. Also, the ordinance required that a demolition permit be reviewed and have a CMP and board review. We also would like to note that when the applicant applied for the demolition permit, he signed an affidavit that this was not part of a larger project. This is clearly misleading. It misled staff. It was contrary to the facts. The applicant had already been before the board for a second story and for development. That was three stories. This simply is not factual. The facts were compounded when a very talented staff person aired and said this 1905 craftsman demolition had no impacts. The record of the HPOZ board minutes and all of the material would lead one to believe that there were issues, and that there ought to have been additional review of the demolition permit. And that is a copy of the demolition permit that was issued. Um, it is really critically important that you sustain the appeal, at least in part today, so we can get a correction to some of the things that have occurred.

Appellant Jean Frost: Uh, in summary, these are all of the issues. There are I'm sure you've read some of the record. There's substantial issues with regard to, uh, the issuance of this permit. We know you can't automatically say, okay, we're going to make this a compatible two story building, and we're going to redesign it to make it attractive, to make it compatible. It's a one and two story, um, block of craftsman houses for the most part one and two story. And, uh, this is our ask, which we believe will not impact the housing, provide the density. Uh, it's not, um, logical or probably easy to think that this would be redesigned, but we would like you to find the permit void. Send it back to the University Park HPOZ board for a retroactive CCMP and review. Um, ask that city planning update the survey after 25 years, so I'm not before you. Additionally, and in future cases for non-contributors, that ought to have been contributor altered. And lastly, uh, create a preservation fund. They've done this in Adams-Normandie and in Pico Union. And the preservation fund could make the persons that are there that are aggrieved parties and the stakeholders of this really significant neighborhood. It would assist to

make them whole and give them a, um, some kind of a plus for something that has been, I think, in spite of staff's very, very diligent efforts, um, and misleading and inappropriate action. So those are the things we're asking you today to sustain the appeal. We support affordable housing. We've done that. This is not an issue of affordability. Thank you. If you have any questions, I'll be around.

President Lawshe: Thank you very much.

President Lawshe: I'm sorry sir, are you with neighborhood council.

Jim Childs (NANDC): Yes, I am neighborhood council.

President Lawshe: Okay. So we'll there'll be a time for you to make your your presentation.

President Lawshe: And, uh, is the property owner present? Okay. Would you please approach the podium?

Patrick Jen: Morning, everybody. My name is Patrick Jen. I'm with the applicant group. Um, don't have much to add. A couple, just 1 or 2 points. Um, firstly, we take issue with the appellants claim that either we or the planning department or somebody in the Department of Building Safety somehow tried to subvert or mislead or was somehow disingenuous in how we went about this process. I think you'll find that staff's report was very clear and comprehensive, and that all the proper procedures were followed and the, the, the project was completely above boards. Secondly, I think it's important to note that the project is, as per staff's report, almost complete. We are pending utility install, which we expect to receive late this year and hope to see a low in early January. That's six new affordable, fully affordable housing units that are going to be available to this city, which, if not for the ED1 process, would have been held up by this particular appeal and under any other entitlement. So if there are any questions, I'm here to answer them. But I'm fully confident in staff's report that all the bases were covered. Thanks for your time.

President Lawshe: Thank you.

President Lawshe: Okay. We'll now open for public testimony for this item. And I actually don't have any in-person cards. Is there anyone on zoom?

CPC Assistant: For the record, we do not have any individuals with their hands raised at this time.

President Lawshe: All right. Thank you. And the gentleman, the certified neighborhood council rep.

President Lawshe: Are you Mr. Childs?

Jim Childs (NANDC): Yes, I am. Excuse me, yes, I am.

President Lawshe: Alright. Thank you.

Jim Childs (NANDC): Uh, I'm a member of the neighborhood council, and, uh, we're in support. Uh, we have already submitted a letter for the record for your review, but I just want to share my

own, uh, comments on this about the situation. Uh, I was here last month testifying for the neighborhood council again on the same issue of demolitions without appropriate review involving historic properties. Uh, our neighborhood is surrounding USC, and it's one of the oldest neighborhoods left in the city. And we've worked for decades in that neighborhood getting the proper protections afforded to us by the city, and there have been some issues with the ED1. One is that how that was rolled out that caused us to be susceptible to the very demolition procedures that the rest of the city are often confronted with? The property has been misconstrued as being a non-contributor, and that label enables a process that's different from what should have been required. And it's within that difference between contributor and non-contributor that these issues of demolition, without proper review and transparency, and the right of the community to speak to the demolition before it happens, not like I'm doing today after it's occurred. You cannot bring the building back, but you can help us stop more of these things from happening. As Miss Frost mentioned this is a 25 year old survey that was wrong when it was done, and it's been wrong ever since. And the Office of Historic Resources have refused every effort by the community and including paying for the survey ourselves, to move to change their mistake. You can ask them why that's going on, but there are over 100 misidentified properties in the HPOZ. And if this is going to happen one after the other after the other, I'm too old to keep coming back here and asking for your help. I've been involved in this for 40 years, and these kinds of demolitions demoralize the very structures in the neighborhoods that you want to create and are responsible for. It's important to understand that when you buy into an HPOZ, you're buying into history and to have these developments occur without process. And the right to challenge it undermines the very economic benefits of living in an HPOZ. And we will lose more buildings and more history and more affordable housing, because that's what happens when you have historic buildings. They're affordable. Thank you.

President Lawshe: Thank you very much.

President Lawshe: Um, Cecilia, do you know whether the council member, um, weighed in? I assume they're not here.

Cecilia Lamas (CPC Assistant): Cecilia Llamas. For the record, they did not reach out stating they would be participating for this item.

President Lawshe: All right. Thank you. Then that was the last speaker. Public testimony is now closed. Uh, does the staff have any further comments?

AZA Jordann Turner: Uh, Jordan Turner? Uh, no, I do not.

President Lawshe: All right, then we will begin our our deliberations, starting with Commissioner Klein.

Commissioner Klein: So the appellant brought up four areas of action. Um, I'm not sure I understand what voiding the permit would do since the project is built or if it goes to the house for approval. What does that do for the project given it's built?

AZA Jordann Turner: By Jordan? For the record, um, honestly, nothing. Um, as mentioned, the project was applied for and built pursuant to ED1, um, what was previously there has been demolished and new buildings been constructed. So, um, honestly, I don't know what would be accomplished by remanding it back to, um, the HPOZ board.

Commissioner Klein: Then question, um, what would it take in terms of the planning department to take steps to amend the HPOZ survey?

AZA Jordann Turner: Uh, Jordan Turner, Department of City Planning, um, maybe go to your left across the way. I think our executive team is here, probably best equipped to shed as much light as they can on the issue.

Kevin Keller (Planning): Uh, good morning, commissioners. Kevin Keller Executive Officer Um, in regards HPOZs to there's a required, uh, survey that's done for that work, I think we've, uh, noted this issue. We can certainly, uh, check in on it again. Uh, there is a requirement to resurvey with a consultant. That is an expense. Um, also, at the moment, there are state laws that preclude us from expanding, uh, historic districts, uh, unless we use objective guidelines, which we are working on. So I think in this case, that larger comment, I had already made a note to, uh, refer that to our Office of Historic Resources so we can make make sure we're aware of that.

Commissioner Klein: Um, I will say I'm sensitive to the issues in HPOZs, and I happen to live in one myself and noncontributing properties are always an issue about what can be built there. Um, and obviously this property that was built is not beautiful or craftsman like, etc., but needed housing. So, um, uh, I would like the planning department to take the next steps to even look into this for this area. It is a significant area with a lot of character. So I get it.

President Lawshe: Thank you. Commissioner Saitan?

Commissioner Saitan: This is Commissioner Saitan and I have no comments at this time. Thank you.

President Lawshe: Thank you, Commissioner Diaz?

Commissioner Diaz: I also have no comments at this time. Thank you.

President Lawshe: Thank you. Um, Commissioner Cho?

Commissioner Cho: I don't have any comments.

President Lawshe: Hello. Hi. Mr. Chavez.

Commissioner Chavez: Yeah. Commissioner Chavez, so I'm curious what staff thinks about what could be lessons learned. Carrying forward. Um, just kind of hearing the appellant's comments. How do we balance, obviously, the need for housing while also, you know, got a delicate balance of where those where that housing is getting built.

AZA Jordann Turner: Jordan Turner, Department of City Planning. Um, I think that's kind of our everyday challenge. Um, as I mentioned, our ED1 ordinance is now permanent. So I think there's going to be a balance between providing affordable housing. Uh, but also having, um, these historic areas that are beautiful within our city. I think a lot of it comes down to design and obviously will, um, and intent of developers to make an effort to make something look close to what's around there or to make it as nice as possible. But I think as we've kind of articulated earlier, our department's doing a lot to accommodate as much housing as possible, but also

yet make it, uh, as beautiful as possible or appealing as much as we can given the regulations that we have.

Commissioner Chavez: I imagine that for this, for this body, that's also part of our responsibility, right? Ensuring that as these projects are coming forward early on, right, that we are making at least highlighting, I think some of those those balances that we observe. Thank you for those comments.

Kevin Keller (Planning): Commissioner Chavez. Kevin Keller here. Executive Officer Just to build on Mr. Turner's comments yesterday, the the council did adopt and the final permanent version of ED1, and that permanent ordinance does include additional protections for properties in historic districts as the permanent program is implemented.

President Lawshe: Thank you. Commissioner Johnson?

Commissioner Johmson: Commissioner Johnson, for the record, I just want to acknowledge the concerns that the BOC Group bought. University Park is a very special neighborhood. It's, um, unique within the city of Los Angeles. But we're also in the midst of a housing crisis, a crisis of affordability, and also a housing shortage. And so, um, you know, I also wanted to address the comments about making a building as beautiful as possible or as consistent with the, um, sort of historic design characteristics. It's just very challenging to do. And I speak as a developer, it's frankly almost impossible because of the cost associated with that. Um, but I did just want to acknowledge that I understand, um, the HPOZ group's concerns. It is a very special neighborhood. And and this is just going to be a challenge that we'll have to confront together to the best of our abilities.

President Lawshe: Thank you, Commissioner Rosenstein?

Commissioner Rosenstein: Commissioner Rosenstein, for the record, um, I want to echo that that sentiment, um, 15 years ago when I was in the Beverly Hills Planning Commission. I was one of the commissioners who wrote the historic preservation ordinance for Beverly Hills, um, which was put into effect. And it now has a cultural heritage commission and, uh, ability to preserve, um, culturally and architecturally significant, uh, properties in Beverly Hills. Um, that being said, you know, when we had something similar to this in front of us last time, I believe, and correct me if I'm wrong, there was a little bit of a different situation in that that one was not applied for as an ED1, but was converted to turned into an editor one to comply with the with the demolition that had occurred. That is not the case here. Right?

AZA Jordann Turner: Jordan Turner that is correct. Yeah. This one is a little more of a shorter history than the other.

Commissioner Rosenstein: The previous one was applied for as an ED1.

AZA Jordann Turner: Correct.

Commissioner Rosenstein: And if if the same application was submitted today, the demolition, the situation would be different based on the current iteration of ED 1.

AZA Jordann Turner: Correct? It'd be subject to our current standards and the new ED1 basically, which would be more or less a process that the applicant would go through through the HPOZ board. And then ultimately, I think a decision by the department.

Commissioner Rosenstein: So they would be subject to all the things that are being requested. Had it been, well, for the most part, had it been applied for today.

AZA Jordann Turner: It's your turn again. Procedurally, yes.

Commissioner Rosenstein: Yes. But they were. They applied before the City Council put that into effect, or ED1 was amended to put that into effect. Right.

AZA Jordann Turner: Correct. The last amendment of PD one I believe, was July 2024, which then precluded projects within historic areas.

Commissioner Rosenstein: So in this case, the applicant played by the rules.

AZA Jordann Turner: Correct.

Commissioner Rosenstein: And did everything in a timely manner and the permits and approvals were issued in a timely manner.

AZA Jordann Turner: That's correct.

Commissioner Rosenstein: So, you know, this is a situation where, yes, we may not love or the the appellants may not love where we're at, but unfortunately it does seem like the applicant played by the rules. The city processed it as it's supposed to, and subsequently Ed1 was amended to address your concerns. But unfortunately we are in a position where there was no error. Um, as as I can see it and, uh, everything was done correctly. Um, so I am sympathetic to, to the historic architectural, uh, contributors or non contributors, but to the zone, um, and doing as much as we can to preserve it. I'm also agree that we are in a housing crisis, and we do need things like this. Um, but it sounds like the process has been adjusted to address concerns like the appellant has as well. Um, so with that, you know, since nothing does seem to be done in error in my, my I see it, I will be, uh, denying this appeal.

President Lawshe: Thank you. Um, uh, I don't want to belabor this case. Um, all of you have all of my fellow commissioners have made excellent points. I do want to, um, acknowledge the folks that showed up, um, from the all the work that you've done all the time, um, and love and care you've invested in your community. And we we do understand, and I hope you understand from this last exchange with Commissioner Rosenstein that it appears that the applicant did follow the correct process at the time. Uh, I also am not crazy about the design. You know, I understand the constraints of building a six unit, uh, property, but I would I would hope that if this applicant goes on to do other, uh, projects in historic neighborhoods, that you'd pay more attention, uh, and try to build in some character to your design. Um, and I also wanted to, um, uh, to ask staff to follow up on Commissioner Klien's, um, request to clarify. So we're not in this murkiness, um, in the future. And with that, I would entertain an I would entertain a motion on this item.

Commissioner Klein: Commissioner Klein moves to approve with the amendment that staff follow up on the, HPOZ um. uh, changes stop enough.

Cecilia Lamas (CPC Assistant): For the record. So you are adopting staff's recommended actions? Yes, with the caveat of the amendment. Okay. Got it.

Commissioner Klein: Thank you.

President Lawshe: We have a first. Is there a second?

Commissioner Rosenstein: Mr. Rosenstein I'll second.

President Lawshe: Cecilia, we have a first and a second. Please call for the vote.

Cecilia Lamas (CPC Assistant): Cecilia, for the record, Commissioner Klein. Yes, Commissioner Rosenstein. Yes. Commissioner Chavez.

President Lawshe3: Yes.

Cecilia Lamas (CPC Assistant): Thank you. Commissioner Diaz. Yes, Commissioner. Johnson. Yes. Commissioner Saitman. Yes, Commissioner. Vice president. Cho. Yes. Commissioner. President.

President Lawshe: Yes.

Cecilia Lamas (CPC Assistant): And the motion carries.

President Lawshe: Thank you. And now, closing item eight. And before we open item nine, let's let's take a ten-minute break and reconvene about 1030.

Cecilia Lamas (CPC Assistant): Thank you. The time is 10:19.

Brownstein

Brownstein Hyatt Farber Schreck, LLP
310.500.4600 main
2029 Century Park East, Suite 950
Los Angeles, California 90067-2918

March 9, 2026

VIA E-MAIL (CPC@LACITY.ORG)

President Lawshe and Hon. Members of the
Los Angeles City Planning Commission
City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 340
Los Angeles, CA 90012

Valentina Knox-Jones, City Planner
Department of City Planning City of Los
Angeles 200 N. Spring Street, Room 621
Los Angeles, CA 90012
Email: valentina.knox.jones@lacity.org

RE: Response to February 19, 2026 Letter
640 S. San Vicente Boulevard Medical Clinics and Surgery Center Project; Case No. CPC-2023-5444-GPA-ZC-HD; Environmental Case No. ENV-2023-5445-ND

Dear President Lawshe and Hon. Members of the City Planning Commission:

This Firm represents the project applicant, Land of the Free LP ("Applicant"), in connection with the above-referenced project at 640 S. San Vicente Boulevard, Los Angeles, California 90048 ("Project"). We write in response to the February 19, 2026 letter submitted by Jamie T. Hall of Channel Law Group, LLP, on behalf of the Beverly Wilshire Homes Association (the "BWHA Letter"), which opposes the Project and, without supporting analysis or evidence, demands preparation of an Environmental Impact Report (EIR). The Project is straightforward and limited. It changes the use of an existing five-story, approximately 68,500-square-foot medical office building to medical clinics, with a 9,996-square-foot surgery center on the ground floor. [1] No exterior construction is proposed. No new floor area is proposed. The existing parking structure remains unchanged. Construction consists only of interior tenant improvements to be completed incrementally, tenant by tenant, over approximately 24 months. The building was originally constructed as a medical office in 1953–1954 and has long operated with medical uses.

To facilitate this limited change of use, the Applicant has requested a General Plan Amendment from Limited Commercial to Regional Commercial, a Zone Change from CR to C2, and a Height District Change — all subject to "Q" conditions and "D" limitations that restrict permitted uses to medical clinics and a surgery center in substantial conformance with Exhibit A, cap FAR at the existing 2.33:1 (approximately 68,500 square feet), and cap building heights at 75 feet (medical building) and 50 feet (parking structure). Vehicular access remains exactly as it is today via two existing driveways into the parking structure, one off the San Vicente frontage road and one off the alley. Hours of operation are conditioned to the City's Commercial Corner limits: 7:00 a.m. to 11:00 p.m., with specified windows for sweeping, trash collection, and deliveries.

To avoid any confusion, these constraints were not added in response to the BWHA Letter. They have been part of the noticed Project and the staff's recommended approval from the outset. The approval already: (i) imposes "Q" conditions limiting the site to medical clinics and a defined surgery

[1] The existing building was constructed between 1953 and 1954 as a medical office building, and has been operating primarily as a medical office building since.

center in substantial conformance with Exhibit A; (ii) applies a "D" limitation capping FAR at the existing 2.33:1 and capping building heights; (iii) limits the scope to interior tenant improvements only, with no exterior construction and no increase in floor area; (iv) maintains existing vehicular access via the frontage-road and alley driveways; and (v) conditions operations, including hours, consistent with the City's Commercial Corner standards. The record also includes the historic resources memo and confirms compliance with medical-waste regulations. In short, the BWHA Letter's "requests" merely restate conditions and clarifications already embedded in the recommended approval and analyzed in the IS/ND.

The City prepared and circulated an Initial Study/Negative Declaration (ENV-2023-5445-ND), and staff recommends adoption by the City Planning Commission. We have reviewed the BWHA Letter and the Staff Report's response. As set forth below, the BWHA Letter does not present substantial evidence supporting a fair argument of any significant environmental impact. The ND is supported by the record, and the requested entitlements should be approved consistent with staff's recommendation.

I. THE FAIR ARGUMENT STANDARD AND SUBSTANTIAL EVIDENCE IN CEQA

Under CEQA, a lead agency must prepare an EIR when substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. (Pub. Resources Code, § 21080, subd. (d); Cal. Code Regs., tit. 14, § 15064, subd. (f)(1).) "Substantial evidence" means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (Guidelines, § 15384, subd. (a); see also Pub. Resources Code, § 21082.2.) "Argument, speculation, unsubstantiated opinion or narrative, [or] evidence which is clearly erroneous or inaccurate" does not constitute substantial evidence. (Pub. Resources Code, § 21082.2, subd. (c); Guidelines, § 15384, subd. (a).) Expert opinion can qualify, but only if supported by facts; "in the absence of a specific factual foundation in the record, dire predictions by nonexperts regarding the consequences of a project do not constitute substantial evidence." (*Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 690–691.) Lay testimony on technical or scientific matters likewise is not substantial evidence without a concrete factual foundation. (*Newtown Preservation Society v. County of El Dorado* (2021) 65 Cal.App.5th 771, 789–792, 279 Cal.Rptr.3d 915 [rejecting lay testimony on technical matters not grounded in specific facts) Where the record contains affirmative expert analyses showing less-than-significant impacts, conclusory assertions to the contrary do not create a fair argument requiring an EIR. (*Joshua Tree*, supra, 1 Cal.App.5th at pp. 690–691.)

II. BWHA DOES NOT PRESENT EVIDENCE OF A SIGNIFICANT IMPACT

The BWHA Letter raises a series of objections across several CEQA topic areas. None is accompanied by expert analysis, technical data, quantitative studies, or fact-based evidence sufficient to constitute substantial evidence. The letter consists almost entirely of speculation, rhetorical assertions, and legal conclusions unsupported by any identified factual foundation. Each topic is addressed briefly below.

A. Transportation and Traffic

The BWHA Letter asserts the Project will generate significant traffic impacts, cause alley cut-through traffic, create parking overflow in the adjacent historic district, and cumulatively worsen conditions

with the approved project at 650–656 S. San Vicente Boulevard. These assertions are offered without any traffic study, trip generation analysis, VMT modeling, or expert opinion.

By contrast, the record contains affirmative evidence that the Project will not cause a significant transportation impact. The IS/ND includes a Transportation Study Assessment reflecting that the change of use from medical office to medical clinic generates a net increase of no more than 90 daily vehicle trips — well below the City's 250-trip screening threshold. LADOT reviewed and signed the referral form, confirming no further traffic study was required. Under current CEQA practice, transportation impacts are measured by vehicle miles traveled ("VMT"), not level of service or intersection delay, and a project screened out under LADOT's VMT methodology does not trigger a significant impact finding. The BWHA Letter does not submit any competing VMT analysis, trip generation study, or expert traffic opinion. Speculation about alley use and parking spillover, unaccompanied by any data or technical assessment, does not constitute substantial evidence.

B. Cumulative Impacts with 650–656 S. San Vicente

The BWHA Letter argues that the Project, combined with the approved 650–656 S. San Vicente project, will create cumulatively significant traffic impacts. It demands that the Applicant participate in and contribute financially to the Neighborhood Traffic Management Plan ("NTMP") required as mitigation for that project. This argument fails for several reasons. First, the 650–656 project is an entirely different proposal — a new 12-story, 145,305-square-foot mixed-use development on a site that was previously occupied by a Big 5 Sporting Goods store and a vacant educational building. That project's EIR identified significant traffic impacts arising from the construction and operation of a large new building on a previously low-intensity site. This Project, by contrast, involves no exterior construction and no increase in building area at a site that has been in continuous medical office use for decades. The IS/ND addresses cumulative impacts and concludes they are less than significant — a conclusion consistent with the minimal operational change this Project entails. Second, the BWHA Letter identifies no evidence — no study, no data, no expert opinion — demonstrating that the marginal net increase of 90 daily trips from this Project would be cumulatively considerable in light of the 650–656 project's mitigation measures and NTMP. Bare demands for financial contributions are not substantial evidence of a significant cumulative impact.

C. Air Quality

The BWHA Letter contends the Project may conflict with applicable air quality plans, exceed SCAQMD thresholds, and expose sensitive receptors to pollutant concentrations. It offers no emissions modeling, health risk assessment, or expert opinion to support these claims. The IS/ND analyzes air quality and concludes that the Project — which involves no construction of a new building, no new stationary emission sources, and no significant increase in vehicle trips — will not generate substantial pollutant concentrations or conflict with adopted air quality plans. Interior tenant improvements are minor and subject to standard SCAQMD dust control measures. The BWHA Letter's assertions are entirely conclusory and do not constitute substantial evidence.

D. Hazardous Materials and Medical Waste

The BWHA Letter asserts that the Project will generate hazardous medical waste but fails to identify any specific waste stream, quantity, or handling deficiency that would create a significant impact. It offers no expert analysis of medical waste management practices, nor does it explain why such waste stream will be any more significantly different than the waste already created by the existing

medical office uses. The IS/ND addresses hazards and hazardous materials. Medical clinics and ambulatory surgery centers are subject to comprehensive regulation under the California Medical Waste Management Act (Health & Saf. Code, § 117600 et seq.) and the Medical Waste Management Program, which requires permitting, tracking, training, and licensed transport and disposal. The Project will comply with all applicable federal, state, and local regulations governing medical waste. Compliance with existing regulatory programs constitutes substantial evidence that impacts are less than significant. Speculation about potential hazards, without any factual basis, does not create a fair argument to the contrary.

E. Historic Resources

The BWHA Letter notes the Project's proximity to the 6th Street–Orange Street Multi-Family Residential Historic District and individual historic resources. The Applicant commissioned an independent historic resources analysis by Helix Environmental Planning, which concluded the Project would have no indirect impact on any adjacent historic resource. This conclusion rests on the fact that the Project involves no exterior changes, no alteration of the building's massing or scale, and no change to the existing streetscape or viewshed. The Helix memo evaluates the Project against the Secretary of the Interior's Standards for Rehabilitation and finds no adverse effect. The BWHA Letter does not submit any competing historic resources analysis, expert opinion, or factual basis to challenge the Helix memo's conclusions.

F. Project Description and Scope of Entitlements

The BWHA Letter characterizes the requested entitlements as a "blank check" that would open the site to all C2 uses and unlimited height. This is inaccurate. The recommended approval includes "Q" conditions restricting permitted uses to medical clinics and a surgery center, and a "D" limitation capping FAR at approximately 2.33:1 — the existing FAR of the building. The approval requires substantial conformance with Exhibit A. Any future change in use, expansion of the building, or deviation from the approved parameters would require a modification to the grant and new CEQA review. These controls are part of the project description and directly constrain the scope of the entitlement.

G. Energy

The BWHA Letter's assertions regarding energy consumption are conclusory and unsupported. The IS/ND analyzes energy use and concludes that the interior tenant improvement of an existing building for a use operationally similar to its current medical office function will not result in wasteful, inefficient, or unnecessary consumption of energy. No competing data or analysis was submitted.

H. General Plan Consistency

The BWHA Letter alleges General Plan inconsistencies but identifies no specific policy that prohibits the Project. The Staff Report’s findings demonstrate consistency with the Wilshire Community Plan, Framework Element, and applicable policies. CEQA addresses physical environmental effects, not abstract policy disagreements, and a claim of policy inconsistency is not reviewed under the fair-argument standard. A policy dispute, without evidence of a resulting physical environmental effect or a conflict with land-use standards adopted to mitigate environmental impacts, does not trigger preparation of an EIR. See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 695–696 (fair-argument standard does not apply to

community plan consistency; Pocket Protectors limited to inconsistencies with land-use standards adopted to mitigate environmental impacts). See also F*riends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 816–817 (strong deference to agency's plan-consistency determinations).

III. THE COMMON SENSE EXEMPTION INDEPENDENTLY SUPPORTS THE PROJECT

Although the City has appropriately prepared an IS/ND, the Project also independently qualifies for the common sense exemption under CEQA Guidelines section 15061(b)(3), which applies "where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment." (Cal. Code Regs., tit. 14, § 15061, subd. (b)(3); *Muzzy Ranch Co. v. Solano County Airport Land Use Com*. (2007) 41 Cal.4th 372, 380.) When an agency invokes section 15061(b)(3), its determination must be supported by evidence in the record showing the agency considered possible environmental effects; however, "determining whether a project qualifies for the common sense exemption need not necessarily be preceded by detailed or extensive factfinding. Substantial evidence appropriate to the CEQA stage in issue is all that is required." (*Muzzy Ranch*, supra, 41 Cal.4th at pp. 387–389.) If a project is properly found exempt, no further CEQA review is necessary. (*Muzzy Ranch*, supra, 41 Cal.4th at pp. 380–381, citing *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 74.)

Application to the record here remains the same: this is an interior change of use within an existing building envelope, with no exterior construction, no increase in floor area, FAR capped at the existing 2.33:1, unchanged access and parking, and Q and D conditions constraining operations to medical clinics and a defined surgery center. On this record, there is substantial evidence to support a determination that the activity has no possibility of causing a significant environmental effect.

IV. CONCLUSION

The BWHA Letter does not present substantial evidence supporting a fair argument of a significant environmental impact under any CEQA topic area. Its claims consist of argument, speculation, and conclusory assertions — precisely the categories of evidence CEQA excludes from the fair argument calculus. The record, by contrast, contains affirmative, fact-based technical analyses from LADOT, Helix Environmental Planning, Caltrans, and the City's IS/ND — all of which support the Negative Declaration's conclusion that the Project will not have a significant effect on the environment. We respectfully request that the City Planning Commission adopt the Negative Declaration, ENV-2023-5445-ND, and approve the Project.

Sincerely,

Brownstein Hyatt Farber Schreck, LLP



Daniel F. Freedman

Planning CPC <cpc@lacity.org>

Re: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

Sienna Kuo <sienna.kuo@lacity.org> Thu, Mar 5, 2026 at 12:42 PM
To: Emily Owens <emowens25@gmail.com>
Cc: Juliet.Oh@lacity.org, vince.bertoni@lacity.org, Ira.Brown@lacity.org, Planning CPC <cpc@lacity.org>

Hello Emily,

Thank you for sending this detailed letter regarding the project. We have received your comments and concerns and you have been added to the interested parties list.

Please submit this letter to the Commission's Office for the benefit of the City Planning Commission at cpc@lacity.org

Thank you.

On Thu, Mar 5, 2026 at 12:20 PM Emily Owens <emowens25@gmail.com> wrote:

> Dear Ms. Kuo,
>
> My name is Emily Owens. I have lived just east of the proposed project for 5 years, and my garage entrance is in the Toledo Court alley the applicant proposes to use for all ingress/egress.
>
> I am respectfully requesting that City Planning deny the proposed project at 1410–1422 Main Street.
>
> Both the LUPC and the full Venice Neighborhood Council voted unanimously to oppose the project due to major unresolved issues related to height, mass, parking, alley safety, neighborhood compatibility, and overall feasibility. Their attached letter outlines nine detailed findings, all of which I agree with and are reason enough to deny this project.
>
> After losing at LUPC and facing overwhelming public opposition at the initial City Planning hearing, this developer came back to the neighborhood with revised plans that do almost nothing to reduce the footprint of their project. They proposed reducing the height of their rooftop solar trellis by merely 5' and replacing two of their proposed restaurants with a 20th unit. It is still not feasible in this space and still not acceptable to the community.
>
> The applicant is improperly invoking AB 2097, despite proposing multiple restaurant spaces that will clearly overwhelm neighborhood parking and rely entirely on a substandard alley. Instead of providing 118 parking spots, which is what would be required for a project of this size they are offering only 18. This gap of 100 parking spots is untenable in this neighborhood two blocks from the beach. The 200 block of Market Street contains space for 38 total vehicles, and the 200 block of Horizon contains space for 48. These are dense blocks full of multi-unit buildings and many of us do not have garages. We already struggle to share parking with patrons of the commercial district along Abbot Kinney and Windward Circle, not to mention the thousands of visitors who come to the Venice Beach Recreation area daily.
>
> They are relying on an outdated determination from the Department of Transportation from their previous submission, a project that was significantly smaller, to allow them to use the alley for all ingress/egress. This determination said it would be "feasible" to use the alley but given the increased size and scope of the current project, this is certainly no longer applicable.
>
> In addition, the application filed with the city is still incomplete and contains material inaccuracies.
>
> · No ZIMAS Parcel Profile Report, despite being checked off as included.
>
> · No required Change of Use, even though the site contains two homes and the proposal converts the property to multi-story restaurant/commercial uses.
>
> · A "2'–6' alley dedication (TBD)" is listed with no engineering plan, no justification, and no right-of-way analysis. I cannot emphasize enough how much of a negative impact this would have on all of the residents of Market Street and Horizon Ave, who already have trouble navigating this alley. Adding so much traffic would almost certainly increase noise pollution, accidents, and property damage to this area.
>
> · The "special designation" box was checked with no supporting documentation.
>
> · Multiple analyses required for Coastal Act, CEQA, and Venice Specific Plan compliance are absent because the basic filing is incomplete.

Because the application is incomplete, inaccurate, and fundamentally misrepresents the project, the City does not have sufficient information to evaluate the proposal under required laws and policies. The developer's representative has repeatedly said that he just wants to get the shell approved and that the details of the interior will be determined later. This is not fair to us in the neighborhood and requires that we must continue to battle with them again and again. Perhaps he hopes that people's attention can wane or people can be worn down. Do not let him get away with this strategy.

Given these defects — combined with unanimous community and VNC opposition — the only appropriate action is to deny or postpone the project until a complete and accurate application is submitted.

Thank you for your time and attention.

Sincerely,
Emily Owens, Ph.D.

233 Market St, Unit A
Venice, CA 90291

--



Sienna Kuo
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012
T: (213) 978-1376 | Planning4LA.org


Planning CPC <cpc@lacity.org>

Support the proposed 20-unit mixed use project in the Venice Community

Gigi de Pourtales <Gigi.dePourtales.1006678935@advocatefor.me> Mon, Mar 9, 2026 at 9:55 PM

Reply-To: Gigi de Pourtales <gdepourtales@namiglac.org>
To: Cecillia Lamas <cpc@lacity.org>

Dear Chair and Planning Commissioners,

On behalf of people that care about our more vulnerable neighbors, i urge you to approve and move forward case number: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA that proposes a 20-unit mixed use housing development project in the Venice Community.

This project, as proposed by Crest Real Estate, will provide much-needed housing in the Venice community while providing economic opportunities for small businesses via ground floor commercial. It will provide attraction to new residents and in turn create more recreational, entertainment, and shopping opportunities in the established community.

I believe the floor plan and project as proposed by the applicant has been carefully crafted to stay consistent with the pattern and character of the neighborhood. It is also worth saying that the applicant has made several reiterations to satisfy the concerns from the community.

For these reasons, we ask that you approve and move forward this critical project that will provide much needed housing opportunities for those who work in Venice and the job-heavy westside.

Thank you for your consideration.

Gigi de Pourtales
gdepourtales@namiglac.org
NAMI Greater LA County

Planning CPC <cpc@lacity.org>

Re: CPC-2021-2020-DB-CDP-SPCC-MEL-HCA; ENV-202102021-EAF at 1410-1422 Main Street Venice

Kathleen Rawson <kathleenrawson@gmail.com> Mon, Mar 9, 2026 at 10:16 AM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org, cpc@lacity.org
Cc: "craig.bullock@lacity.org" <craig.bullock@lacity.org>, "sean.silva@lacity.org" <sean.silva@lacity.org>, Traci.Park@lacity.org

On Mon, Mar 9, 2026 at 9:36 AM Kathleen Rawson <kathleenrawson@gmail.com> wrote:

> Dear Planning Staff and CD13 Team:
>
> I am writing as a very concerned citizen of Los Angeles, and specifically Venice regarding the above project. My partner and I live within 500 feet of this proposed development, and have been there since the late 1980's.
>
> As a rule, I am very supportive of commercial development in Los Angeles - we need investment and vitality in our community.
>
> However, there are some key points that need to be considered (also, see attached short video I took this morning to demonstrate the concern).
>
> 1. Toledo Court is a very narrow (13') T-Configured alley. Trash trucks have to make a 3-4 point turn to make the corner. It currently services almost 100% residential use. The subterranean parking access off of Toledo Court makes no sense at all. It will not work. Assuming the planning staff has not been able to make it out to the site to see the configuration the video shows the existing conditions. Parking access has to be off Main Street.
>
> 2. Roof Use - there are residents completely surrounding this site. Roof use for residential use is fine, but commercial use needs to be prohibited. We are already inundated with noise from the rooftop uses along the Boardwalk and Abbot Kinney. We realize that we live in a vibrant district in Los Angeles and that some noise is expected, but this building is literally in a neighborhood.
>
> I am unable to attend the hearing on Thursday due to a speaking engagement, but please consider my points as you contemplate this project.
>
> **And finally, please, visit the location yourself before making any final decisions.**
>
> Thank you for your service and dedication to our beloved community.
>
> Kathleen Rawson
> 310-877-8631
>
> IMG_1059.mov

--
Kathleen

310-877-8631 - cell

Planning CPC <cpc@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

Rick Garvey <rickgarvey@hotmail.com> Sat, Mar 7, 2026 at 5:15 PM
To: Sienna Kuo <sienna.kuo@lacity.org>, Juliet Oh <juliet.oh@lacity.org>, Vince Bertoni <vince.bertoni@lacity.org>, "ira.brown@lacity.org" <ira.brown@lacity.org>, "CPC@lacity.org" <CPC@lacity.org>
Cc: Rick Garvey <rickgarvey@hotmail.com>, Rick Garvey <smallstreetsbighearts@gmail.com>, "president@venicenc.org" <president@venicenc.org>, Robin Rudisill <robin.rudisill.vnclupc@gmail.com>

Ms. Kuo,

I was distressed to read your staff report recommending approval of this project as it is riddled with errors and you did not include important content such as the unanimous findings of denial by the Venice Neighborhood Council and their Land Use and Planning Committee (attached).

A few additional details that I noticed that you have incorrect on your document:

1. Throughout your document, you claim that Main Street is east of the property and the alley is west of the property when the opposite is true. This makes me think you have not actually visited the site.
2. Similarly, you claim that the property sits along an "*unnamed alley which is 16' wide*." The alley in question has a street sign labeled Toledo Court and is only 14' wide. This seems to confirm that you have not actually visited the site.
3. You claim that Main Street has a center median and it does not. This also confirms that you have not actually visited the site.
4. You mention that you took into consideration "*input from the public*" in your approval but there is no record of any public approval. Every single comment from the public at both local hearings and the previous City hearing on December 10 opposed the project. Every single email you received and posted opposes the project. The VNC and LUPC unanimously voted to oppose the project, which you did not reference.
5. You claim that "*the incentives will not have a Specific Adverse Impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources*", however the property is abutted by multiple buildings built in the 1920's that will be adversely affected by the excavation of the land for the underground parking level. The sinkhole that destroyed the property at 1015 Marco Place during the construction of the project at 1812 Lincoln is illustrious of what is likely to occur even closer to the ocean at this property. In fact, there is precedent of a sinkhole occurring at 210 Market Street several years ago concurrent with the removal of a tree.
6. The project is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault yet on page F-4 you state that: "*The project is not located on a substandard street in a Hillside area and is not located in a Flood Zone, Very High Fire Hazard Severity Zone, or any other special hazard area. Therefore, there is no substantial evidence that the proposed project and requested waivers would have a specific adverse impact on public health and safety*."
7. Similarly, you claim that "*The proposed project will be built atop existing grade resulting in minimal disturbance to the existing geology and soils of the project site*" yet they plan to dig an underground parking structure in a Flood Zone and Liquefaction area.

8. You accept their claims that "*primary regional access is provided by the Marina Freeway, Venice Boulevard, and Lincoln Boulevard, which are all accessible within 1.5 miles of the Project Site.*" You should know that the Marina Freeway is NOT within 1.5 miles of the Project Site.
9. You accept that "*based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.*" This is not correct; it would be 54% greater without the solar trellis and 73% greater with it. This is not compatible by any stretch of the imagination and I find it disingenuous that the applicant includes the rooftop deck when it fits their needs and excludes it when it does not.
10. You claim that "*the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources and that the project height, massing and scale of the project is consistent with existing buildings along Main Street.*" Neither of those are true statements. This is another example some something easily disproven by a visit to the site location.
11. You claim that *"The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing. As such, the proposed development is visually compatible with the character of the surrounding area."* Neither of those are true statements, as a quick visit to the site would prove.
12. You claim that *"Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts."* This is not true. Although there are some off-street paid parking options in the area, these are competing with thousands of daily beach visitors and dozens of other restaurants in the immediate area who do not provide parking for their patrons. I challenge their assessment that this project will not cause an undue limitation of existing street parking.
13. You give the applicant historical precedence by accepting their claim that "*numerous 4- and 5-story Pre-Coastal Act buildings exist in Venice, including Hotel Erwin, Venice Breeze Suites, and the Waldorf Building. These buildings establish a precedent for midrise construction in the coastal context.*" You do not take into consideration that each of these buildings were built before the Coastal Act went into effect in 1976 and thus cannot be used as similar precedent.
14. You accept the applicant's claim that they will include a "local hire" provision. You note that the farthest address from the Project site within the area identified as Venice, CA is 1.45 miles away, yet you accept their claim that *"it is realistic to presume that a plurality of the restaurant's employees can be sourced from the region's local workforce supply. Based upon the demography and demonstrated commuting behavior in the area, the Project expects the local higher policy to result in a significantly reduced demand in employee parking."* As the median rent in the Venice 90291 zip-code is currently $4000 per month; I challenge the assumption that the restaurants will be paying their staff enough to allow them to live locally. It is simply not true.

One claim that you make that is true is that (on page F-15) *"The requested 22 feet, 10 inches above the permitted flat roof height will be materially detrimental to the adjoining lots or the immediate neighborhood."* Yet you seem to ignore this finding in your approval.

Given these inconsistencies and outright falsehoods in your document, I urge you to correct the record and reconsider your determination.

Best regards,

Rick Garvey, 234 Horizon #5, Venice, Ca. 90291

Planning CPC <cpc@lacity.org>

1410-1422 Main Street PLEASE DENY

robinmurez <robinmurez@gmail.com> Fri, Mar 6, 2026 at 12:19 PM
To: cpc@lacity.org, robinmurez <robinmurez@gmail.com>
Cc: Rick Garvey <rickgarvey@hotmail.com>, land use planning comm venice neighborhood council <lupc@venicenc.org>, Mark Mack <markmackmack@gmail.com>

Dear City Planning and all interested,

The first home I owned in Venice was 221 Market Street. It is just around the corner from 1410-1422 Main. It shares the undersized alley at the T.

I remember when a project was proposed for this site, years ago. It was overwhelmingly opposed by neighbors and the whole community.

This new iteration is ever more egregious. It looks like they've found every possible loop hole to create an ever more unsafe and imposing development.

Our 120 year old infrastructure cannot support it!

All of the concerns raised by neighbors are completely accurate. This includes without limitation:

> The alley is far too narrow and heavily utilized to handle the buildings parking access. Trash trucks barely make it through. Only one car can pass at a time.
>
> Restaurants would have far too many deliveries, noise, smells, and long hours (prep and clean up with clanking dishes) for this location boarding residences.
>
> Combining 3 lots opposes the Venice Specific Plan and creates too much mass.
>
> Reducing setbacks also makes it far too imposing and dangerous.
>
> Private rooftops cannot be considered as "open space." Any reasonable notion of open space is garden, ground level.

Even those who always advocate for increased density, oppose this project.

It's a sham, a grift, a slap in the face to anyone who lives or wants to live or visit Venice.

For the love of Venice, please oppose this project.

Sincerely,

Robin Murez

Robin Murez
robinmurez@gmail.com
310 709-7826

Planning CPC <cpc@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

Robin Rudisill <robin.rudisill.vnclupc@gmail.com> Sat, Mar 7, 2026 at 7:18 PM
To: Kevin Keller <kevin.keller@lacity.org>, vince.bertoni@lacity.org
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Juliet Oh <juliet.oh@lacity.org>, "ira.brown@lacity.org" <ira.brown@lacity.org>, "CPC@lacity.org" <CPC@lacity.org>, Rick Garvey <smallstreetsbighearts@gmail.com>, theodore.irving@lacity.org, lisa.webber@lacity.org, David Feige <president@venicenc.org>, Mark Mack <mark.mack@venicenc.org>, Craig Bullock <craig.bullock@lacity.org>, Sean Silva <sean.silva@lacity.org>, Jeff Khau <jeff.khau@lacity.org>, traci.park@lacity.org

Kevin and Vince,

I am stunned by the errors, summarized in the email below, that are contained in the CPC Recommendation Report for the 1410 Main St density bonus project, which is to be heard this Thursday by the CPC.

I have been doing this volunteer work as a coastal advocate for well over 10 years and, although at times I haven't been happy with a report for various reasons and have appealed several projects, I have never seen a City Planning report with so many significant errors and a such a clear bias to support a project no matter the facts, a real ethics issue.

This, combined with the fact that this is an extremely significant and potentially precedent setting project for Venice, makes it even more important that you get the facts right as well as disclose the information provided by the impacted community.

You should also know that when this project was noticed for hearing it caught both the neighborhood and the Venice Neighborhood Council (VNC) by surprise. The VNC had heard it several years ago when it was a completely different project. We made a serious effort to have the City Planning hearing delayed as we needed time, at least a month, to review those changes. Planning refused. So, we had to drop everything and have special meetings to review the project on a very rushed basis. And to add insult to injury, Planning didn't even seem to consider our position to deny the project as proposed and did not even include our recommendation and findings in the Report to the CPC.

It is, without question, essential that the report be redone with accurate evidence provided ***and conclusions reconsidered***.

The fact that the report is riddled with errors is in addition to the issue I raised to you on Friday that the VNC's recommendation and detailed findings were not included in the report, even though they were sent to Planning weeks ago. Sending them to the Commissioners at the last minute, when you should have and could have sent them earlier, doesn't fix that problem. The issues are many and the findings are detailed and not something easy for the Commissioners to quickly review.

Please postpone this hearing and require Staff to update and correct the report for the omission of the VNC information as well as correction and reconsideration of every one of the errors below. We ask you to also have a supervisor do a thorough check as to whether there are any other errors.

Best,
Robin Rudisill
Vice Chair/Secretary
Land Use & Planning Committee
Venice Neighborhood Council

Begin forwarded message:
[Quoted text hidden]

Planning CPC <cpc@lacity.org>

PLEASE DENY - CPC-2021-2020-CDP-MEL-SPE-SPP-DB-WDI (1410 - 1422 South Main Street, Venice)

Steve Bevilacqua <emb233@yahoo.com> Tue, Mar 10, 2026 at 8:54 AM
To: "cpc@lacity.org" <cpc@lacity.org>

Dear City Planning Commission:

My name is Steve Bevilacqua and I live on the 200 block of Market Street in Venice, close to the proposed development at 1410-1422 Main Street. I urge you to deny this project due to its substantial problems.

This development has been unanimously rejected by both LUPC and the entire Venice Neighborhood Council, and for good reason. The developers have made minor changes to their plan and are now trying again, but these changes do not fix any of the huge problems.

This building is too big for its location. The only access for cars is via the narrow alley (14 feet). There is not adequate parking for 20 residential units, offices, and a restaurant-bar. The proposed 18 parking spots will not be nearly enough for the number of residents, employees, and patrons of the restaurant. The surrounding streets are already over-burdened for parking. The extra traffic, rideshares, Waymos, parking searches, delivery trucks, trash trucks, people circling the block since the street on one side (Horizon) is a one-way street, intoxicated people leaving the restaurant - all of these create a significant safety hazard for the families around here, especially the kids, and there are a lot of kids around here. This is a neighborhood of families, and this development is out of mass, scale, and character for its location.

This space currently contains two small houses, making the size and scale of this proposed new development egregious. If this development adhered to existing building codes, it wouldn't require so many variances and exceptions. These building codes exist for a reason, so perhaps they should be enforced.

The developer clearly knows the problems with this plan since he has repeatedly tried to slip it through without following the proper channels, including last December when he scheduled a hearing with the city but didn't notify any residents. This resulted in last-minute emergency attention from LUPC and the VNC. The neighborhood councils have repeatedly voted down this development because it is not right for its location. Again, I urge you to follow their example, think about the families who live here, and deny the proposed development at 1410-1422 Main Street in Venice.

Thank you very much for your time.

Best regards,
Steve Bevilacqua
248 Market Street
Venice

10+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:

Item 07:

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Support the proposed 20-unit mixed use project in the Venice Community

Email Message:

Dear Chair and Planning Commissioners,

On behalf of the business community, I urge you to approve and move forward case number: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA that proposes a 20-unit mixed use housing development project in the Venice Community.

This project, as proposed by Crest Real Estate, will provide much-needed housing in the Venice community while providing economic opportunities for small businesses via ground floor commercial. It will provide attraction to new residents and in turn create more recreational, entertainment, and shopping opportunities in the established community.

I believe the floor plan and project as proposed by the applicant has been carefully crafted to stay consistent with the pattern and character of the neighborhood. It is also worth saying that the applicant has made several reiterations to satisfy the concerns from the community.

For these reasons, we ask that you approve and move forward this critical project that will provide much needed housing opportunities for those who work in Venice and the job-heavy westside.

Thank you for your consideration.

Planning CPC <cpc@lacity.org>

Re: Case number CPC-2021-2020-DB-CDP,SPPC-MEL-HCA

Sienna Kuo <sienna.kuo@lacity.org> Thu, Mar 5, 2026 at 11:37 AM
To: Thomas <twoolsey@sbcglobal.net>
Cc: Planning CPC <cpc@lacity.org>

Hello Thomas,

Thank you for your public comment. Would you like to be added to the interested parties list?

If you have any further comments, please provide them to CPC@lacity.org.

Thank you.

On Tue, Mar 3, 2026 at 4:37 PM Thomas <twoolsey@sbcglobal.net> wrote:

> Greetings,
>
> My name is Thomas D. Woolsey and I am a registered Architec who owes the property located at 215 market St, Venice, Ca. 90291. i have received a notice for a proposed project located at 1420 - 1422 S. Main St in Venice.
>
> This property is located adjacent to my property arcoss the alley, E.G. Toledo Ct. The address of my poperty is 215 Market St. Venica, Ca. 90291
>
> I **am in opposition of project for the following reaons:**
>
> - It infringes on the area by reducing avalable natural light as its over 50 feet in height and will tower over neighboring buildings in area
> - There will be an increase of traffic and a reduction of parking in the area
> - There will be an increase of pedestrian traffic and increases congestion in an area already pleagued by extreen beach traffic. both foot and automobile.
> - This proposed project is an eyesore and punches a hole in the fabric of the historical and majestic traffic circle and surrounding area.
> - Alley congestion and waste from the building from the alley side will be increased, and will cause increased verman infestation. The area is already infested with verman and there is a ocntinual migration of rats and mice.
> - Impacts my prop[erty and my tenants by years of construction, noise, distubances, along with risk of injury
>
> This project, which was proposed a few years ago, was rejected, and **it should contuinue to be rejected as it is not a fit for the area!**
>
> Again, I along with many other neighbors, are not in favor with this project, It is a development that belongs on Venice Blvd, **NOT** in the quaint and historic neighborhoods of Venice.
>
> Opposition to an exemption to CEQA
> No density bonus granted for any reason
> No project!!!!!
>
> Than you

Thomas Woolsey
H. E. Woolsey Corporation
Architect / Contractor
310 863 6146
https://hewoolseycorp.com/

--

LOS ANGELES CITY PLANNING

Sienna Kuo
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012
T: (213) 978-1376 | Planning4LA.org
E-NEWS

Planning CPC <cpc@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

Tedd R. <theodor.rossi@gmail.com> Sat, Mar 7, 2026 at 4:19 PM
To: sienna.kuo@lacity.org, Juliet.Oh@lacity.org, vince.bertoni@lacity.org, Ira.Brown@lacity.org, cpc@lacity.org
Cc: smallstreetsbighearts@gmail.com

Ms. Kuo,

I was distressed to read your staff report recommending approval of this project as it is riddled with errors and you did not include important content such as the unanimous findings of denial by the Venice Neighborhood Council and their Land Use and Planning Committee.

A few details that I noticed that you have incorrect on your document:

1. Throughout your document, you claim that Main Street is east of the property and the alley is west of the property when the opposite is true. This makes me think you have not actually visited the site.

2. Similarly, you claim that the property sits along an "*unnamed alley which is 16' wide*." The alley in question has a street sign labeled Toledo Court and is only 14' wide.This seems to confirm that you have not actually visited the site.

3. You claim that Main Street has a center median and it does not.

4. You mention that you took into consideration "*input from the public*" in your approval but there is no record of any public approval. Every single comment from the public at the local hearings and the previous City hearing on December 10 opposed the project. Every single email you received and posted opposes the project. The VNC and LUPC unanimously voted to oppose the project.

5. You claim that "*the incentives will not have a Specific Adverse Impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources*", however the property is abutted by multiple buildings built in the 1920's that will be adversely affected by the excavation of the land for the underground parking level. The sinkhole that destroyed the property at 1015 Marco Place during the construction of the project at 1812 Lincoln is illustrious of what is likely to occur even closer to the ocean at this property. In fact, there is precedent of a sinkhole occurring at 210 Market Street several years ago concurrent with the removal of a tree.

6. The project is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault yet on page F-4 you state that: "*The project is not located on a substandard street in a Hillside area and is not located in a Flood Zone, Very High Fire Hazard Severity Zone, or any other special hazard area. Therefore, there is no substantial evidence that the proposed project and requested waivers would have a specific adverse impact on public health and safety*."

7. Similarly, you claim that "*The proposed project will be built atop existing grade resulting in minimal disturbance to the existing geology and soils of the project site*" yet they plan to dig an underground parking structure in a Flood Zone and Liquefaction Zone.

8. You accept their claims that "*primary regional access is provided by the Marina Freeway, Venice Boulevard, and Lincoln Boulevard, which are all accessible within 1.5 miles of the Project Site."* You should know that the Marina Freeway is NOT within 1.5 miles of the Project Site.

9. You accept that "*based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood."* This is not correct, and I find it disingenuous that the applicant includes the rooftop deck when it fits their needs and excludes it when it does not.

10. You claim that "*the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources and that the project height, massing and scale of the project is consistent with existing buildings along Main Street."* Neither of those are true statements.

11. You claim that *"The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing. As such, the proposed development is visually compatible with the character of the surrounding area."* Neither of those are true statements.

12. You claim that *"Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts."* This is not true. Although there are some off-street paid parking options in the area, these are competing with thousands of daily beach visitors and dozens of other restaurants in the immediate area who do not provide parking for their patrons. I challenge their assessment that this project will not cause an undue limitation of existing street parking.

13. You give the applicant historical precedence by accepting their claim that "*numerous 4- and 5-story Pre-Coastal Act buildings exist in Venice, including Hotel Erwin, Venice Breeze Suites, and the Waldorf Building. These buildings establish a precedent for midrise construction in the coastal context."* You do not take into consideration that each of these buildings were built before the Coastal Act went into effect in 1976 and thus cannot be used as similar precedent.

14. You accept the applicant's claim that they will include a "local hire" provision. The farthest address from the Project site within the area identified as Venice, CA is 1.45 miles away. Most studies use a 5–7-mile radius. You accept their claim that *"it is realistic to presume that a plurality of the restaurant's employees can be sourced from the region's local workforce supply. Based upon the demography and demonstrated commuting behavior in the area, the Project expects the local higher policy to result in a significantly reduced demand in employee parking."* As the median rent in the Venice 90291 zip-code is currently $4000 per month; I challenge the assumption that the restaurants will be paying their staff enough to allow them to live locally. It is simply not true.

One claim that you make that is true is that (on page F-15) *"The requested 22 feet, 10 inches above the permitted flat roof height will be materially detrimental to the adjoining lots or the immediate neighborhood."* Yet you seem to ignore this finding in your approval.

Given these inconsistencies and outright falsehoods in your document, I urge you to reconsider your determination.

Best regards,

Tedd Rossi 242 horizon ave, Venice, CA 90291

Venice Neighborhood Council

P. O. Box 550, Venice, CA 90294
www.VeniceNC.org

December 9, 2025

Sienna Kuo, Planning Assistant
Sienna.Kuo@lacity.org
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012

Re. 1410-1414-1422 Main Street, Venice
CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

Dear Sienna,

The following motions were approved by the Venice Neighborhood Council (VNC) Board at its December 9, 2025 meeting:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

and

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

.

7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.

The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.

The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10′ minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade

directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.
The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.
The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.
The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.
The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing

small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Please contact Mark Mack, Chair of the VNC Land Use & Planning Committee, at Mark.Mack@VeniceNC.org should you have any questions related to this letter and these motions.

Sincerely,

Brian Averill, President
On behalf of the Venice Neighborhood Council

cc:
Mark Mack, Chair, VNC Land Use & Planning Committee
Shannon Vaughn, Coastal Program Manager, California Coastal Commission
Dani Ziff, District Supervisor, California Coastal Commission
Craig Bullock, Planning Director, Council District 11
Jeff Khau, Planning Deputy, Council District 11
Sean Silva, Venice Field Deputy, Council District 11
Ira Brown, City Planner
Tony Russo, Crest Real Estate
Nick Leathers, Crest Real Estate

Attachment: LUPC Staff Report

March 6, 2026

Dear City Planning Commission,

We are Abundant Housing LA, a membership driven pro-housing movement representing thousands of Angelenos across our County. We are writing to you in support of the proposed 19-unit development, including 2 affordable units, at 1925 West Montrose Street. We urge the city to reject the appeal and allow the project to move forward.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing and creating new housing in Culver City will help to reduce issues of gentrification and displacement. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part. This project will help provide that much needed housing by replacing a vacant lot without the loss of any residential units.

This project is in a great location for housing, near bus stops and close to Sunset Blvd and Echo Park. This project is good for Los Angeles and for the region and we again urge the city to reject the appeal and allow the project to proceed.

Best Regards,

Azeen Khanmalek

Azeen Khanmalek
AHLA Executive Director

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director

EDGAR AND CARMEN GRAZZIANI
22667 Mason Court – Santa Clarita CA 91350

Subject: CEQA Evaluation of Class 32 Exemption, Height Modification, and Evidence of Potential Environmental Impacts, TOC.

Case No.: DIR-2023-2337-TOC-HCA-M1

Appeal to Director's Determination TOC Affordable Housing Incentive Program Modification Entitlement.

Project: Proposed 5-Story, 19-Unit Residential Development (67-Foot Height)

Location: 1925 W Montrose, Los Angeles, California 90026

Prepared by: Adjacent Property Owner – 1929 Montrose St., Los Angeles, 90026

Date: March 9, 2026

1.0 PURPOSE

This memorandum evaluates and appeals the City's determination to:

1. Approve a 22-foot height increase (from 45 feet to 67 feet), and

2. Apply a CEQA Class 32 (Infill Development) Categorical Exemption based on a finding that no exception under CEQA Guidelines Section 15300.2 applies.

Substantial evidence demonstrates that the Class 32 exemption is improperly applied and that the height modification results in significant environmental and land-use impacts requiring formal CEQA review.

2.0 PROJECT BACKGROUND AND PROCEDURAL HISTORY

The project was originally permitted on 5/2/2025 for a 4-story, 19-unit TYPVE VA Affordable Housing (2 ELI) Apartment over 1 story type IA parking over 1 level Type IA basement parking per LAMC 12.22.A.31, 45-foot-tall structure. The City subsequently approved a 22-foot height increase, authorizing a 67-foot, five-story building under the Transit Oriented Communities (TOC) Affordable Housing Incentive Program.

The approval states:

- “Approved with Conditions… for the construction, use, and maintenance of a new, five-story, 20,592.3 square foot, 19-unit residential apartment building measuring 67 feet in height and providing 23 vehicular spaces.”

This represents a 22-foot increase over the previously permitted height.

It is also relevant that the previous property owner of the same property was denied approval for a two-story apartment building, while the current developer is granted a five-story, 67-foot structure with limited parking and increased density. This inconsistency raises concerns regarding procedural fairness and the adequacy of environmental review.

3.0 CONSTRUCTION-PHASE CONDITIONS AND UNUSUAL CIRCUMSTANCES

During excavation, the project experienced a significant structural issue along the far right-side property line. The shoring system installed to support the excavation was evidently inadequate and showed signs of potential failure toward the adjacent apartment building. Additional support pipes were installed to stabilize the excavation. Other potentially minor issues are felt to be irrelevant.

This incident:

- Should be documented in City inspection records
- Potentially represents a construction-phase failure
- Constitutes an unusual circumstance under CEQA Guidelines §15300.2(c)
- Creates a reasonable possibility of significant environmental effects

Under CEQA, any unusual circumstance that may cause a significant effect invalidates a Class 32 exemption.

4.0 APPLICABILITY OF CEQA GUIDELINES SECTION 15332 (CLASS 32)

4.1 Class 32 Requirements

To qualify for a Class 32 exemption, a project must demonstrate:

- Consistency with zoning and General Plan
- Location within city limits on a site <5 acres

- No habitat value
- No significant effects relating to traffic, noise, air quality, or water quality
- Adequate utilities and public services

4.2 CEQA Exceptions (Section 15300.2)

A Class 32 exemption cannot be used if:

- The project contributes to cumulative impacts
- Unusual circumstances exist
- The project may cause significant environmental effects
- The site is environmentally sensitive
- The project affects scenic highways
- The site is on a hazardous waste list

The evidence below demonstrates that multiple exceptions apply, invalidating the exemption.

5.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL IMPACTS

5.1 Traffic and Parking

The project proposes 19 units with only 23 parking spaces, despite unit types being 10-1-bedroom, 8-2 bedroom and 1-3 bedroom. The apartment building across the street at 1922 Montrose has approximately 25-30 units with no parking, the adjacent 16-unit building provides approximately one parking space per unit, and tenants already rely heavily on street parking. Other existing apartment building within 600 feet have either limited or no parking whatsoever.

Observed conditions in the surrounding 10-acre area include:

- Vehicles parking in red zones and near fire hydrants
- Street sweeping vehicles unable to service streets due to congestion
- Residents parking in driveways due to lack of street parking
- Evening peak-hour parking saturation is at full capacity

Additionally, a 39-unit apartment building about 440 feet around the corner on Bonnie Brae is nearing completion and this will further intensify parking demand. Not to mention the already existing multiple unit apartments and homes with no parking available.

These conditions demonstrate a significant cumulative parking and traffic impact, inconsistent with Class 32 requirements.

5.2 Noise

Increased vehicle circulation, parking maneuvers, and resident activity associated with multiple new multi-family developments will elevate ambient noise levels. The five-story height and proximity to adjacent homes will also amplify noise reflection and transmission.

5.3 Water Demand and Infrastructure

The addition of 19 units, combined with the nearby 36-unit development, will increase water consumption, wastewater generation, and demand on local infrastructure. No evidence has been provided demonstrating that existing utilities can accommodate cumulative demand without significant impacts.

5.4 Public Safety and Geotechnical Concerns

The prior shoring instability constitutes an unusual circumstance under CEQA. The need for added reinforcement indicates that the site presents geotechnical challenges not typical of standard infill projects.

This raises concerns regarding:

- Long-term structural stability
- Safety of adjacent properties
- Adequacy of construction oversight

These conditions create a reasonable possibility of significant environmental effects.

6.0 HEIGHT INCREASE AND LAND USE COMPATIBILITY

The City approved a 22-foot height increase, resulting in a 67-foot structure directly adjacent to a single-story residence. This creates:

- Substantial and permanent loss of privacy
- Overshadowing and massing impacts
- Incompatibility with surrounding development patterns
- Increased noise, light, and human activity impacts

6.1 Misapplication of the TOC Affordable Housing Incentive Program

The project has been characterized as an "affordable housing incentive" under the TOC program. However:

- The project does not provide meaningful affordability
- It is unlikely to serve low-income or housing-insecure residents
- It functions primarily as a market-rate development receiving height and TOC bonuses
- It does not advance the TOC program's goals of equitable, transit-supportive housing

Therefore, the project's classification as an "affordable housing incentive" is not supported by its actual characteristics, and this misclassification directly affects the City's justification for granting the 22-foot height increase and the Class 32 exemption.

7.0 CONCLUSION AND FORMAL APPEAL

Based on the evidence presented, the project does not meet the criteria for Class 32 Categorical Exemption. Specifically:

- Cumulative impacts related to traffic, parking, noise, water demand, and public safety are significant. The loss of privacy, significantly increased noise due to project directly facing down our property, and the loss of value of our to be enclosed structure will be detrimental.
- Unusual circumstances, including documented shoring instability and the disproportionate height increase, create a reasonable possibility of significant environmental effects.

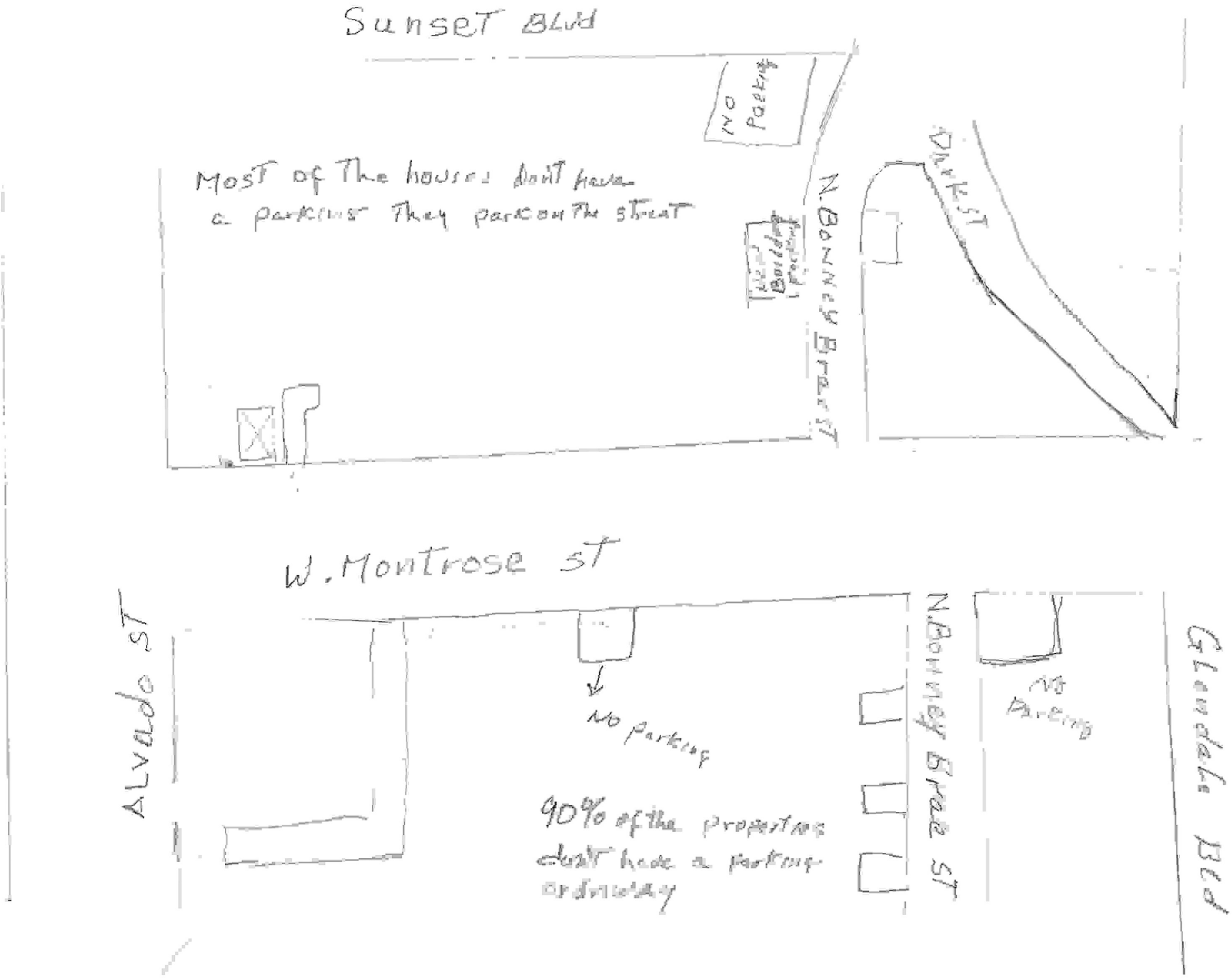
- The 22-foot height modification materially alters the project's scale, massing, and environmental footprint.
- The project does not function as a genuine TOC affordable housing development.
- The City's determination that no CEQA exception applies is not supported by substantial evidence.

Formal Appeal Statement

We strongly appeal the City's decision to approve the 22-foot height increase.

The approval of a 67-foot structure under a Class 32 exemption—despite clear evidence of cumulative impacts, unusual circumstances, and misapplication of the TOC program, represents a significant departure from CEQA requirements and should be rescinded pending appropriate environmental review.

(


Sunset Blvd
NO Parking
Most of the houses don't have a parking they park on the street
N. Bonnie Brae St
Parking
W. Montrose St
Alvarado St
No parking
90% of the properties don't have a parking or driveway
N. Bonnie Brae St
No Parking
Glendale Blvd




FOR RENT
BEDROOM
1922


TAKTA
CONCRETE
ABS
SHORING


Bonnie Brae
St











80+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:

Item 08:
DIR-2023-2337-TOC-HCA-M1-1A

Email Message:

City Planning Commission,

I urge you to oppose the appeal and allow the housing project at 1925 Montrose St. in Echo Park to move forward.

Los Angeles urgently needs more housing, and this project would add 19 new homes, including two for Extremely Low Income households, in a transit-served neighborhood. Delaying or blocking projects like this only worsens our housing crisis.

Please oppose the appeal and support the new housing Echo Park and Los Angeles needs.

DAY OF HEARING SUBMISSIONS

Item No. 7

Department of City Planning

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

March 11, 2026

TO: City Planning Commission

FROM: Sienna Kuo, Planning Assistant

ADDITIONAL TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; 1410 – 1422 SOUTH MAIN STREET

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of March 12, 2026 related to Item No. 7 on the meeting agenda.

The following Findings are modified as follows: (Deleted text is shown below in strikethrough and added text is **Bold** and Underlined.)

Finding 2.b (Page F-4)

> **The Waiver would have a Specific Adverse Impact as defined in California Government Code Section 65589.5(d)(2), upon public health and safety and for which there is no feasible method to satisfactorily mitigate or avoid the Specific, Adverse Impact. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.**
>
> There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec. 65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.
>
> The project is not located on a substandard street in a Hillside area ~~and is not located in a Flood Zone~~, Very High Fire Hazard Severity Zone, or any other special hazard area. Therefore, there is no substantial evidence that the proposed project and requested waivers would have a specific adverse impact on public health and safety.

Finding 3.a (Page F-5)

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

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Venice Specific Plan, as follows:

- The increase allowable FAR to 2.96:1 in lieu of 1.5:1,
- The removal of the 5-foot residential front yard setback in lieu of 5 feet,
- The increase building height to 52 feet, 10 inches in lieu of 30 feet,
- The remove the step back provisions in lieu of a 45 degree step back plane break, and
- The increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet.

In addition, the proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the LAMC, as follows:

- Reduce the northwesterly side yard to allow 5 feet in lieu of 8 feet,
- Reduce the southeasterly side yard to allow 5 feet in lieu of 8 feet.

As discussed in Finding No. 1, the proposed Density Bonus project meets the requirements of Density Bonus State Law to be eligible for the density bonus, incentives, and waivers of development standards. In addition, the proposed development must also comply with the requirements of the Coastal Act. As provided in the findings below, the proposed development complies with the applicable policies of the Coastal Act and the Venice LUP.

Chapter 3 of the Coastal Act includes provisions that address the impact of development on public services, infrastructure, traffic, the environment and significant resources, and coastal access. Applicable provision are as follows:

Article 2 Public Access

Section 30211 Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) It is

inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) Adequate access exists nearby, or, (3) Agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The project site is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone. Therefore, the proposed project will not interfere with or obstruct the public's right to access to coastal resources.

As such, the project conforms to the applicable Public Access policies of Chapter 3.

Article 5 Land Resources

Section 30240 requires the protection of environmentally sensitive habitat areas and to prevent significant impacts on such areas.

Section 30244 Archaeological and Paleontological Resources.
Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. ~~The proposed project will be built atop existing grade resulting in minimal disturbance to the existing geology and~~

~~soils of the project site.~~ **The proposed project includes a subterranean garage and will include the removal of 9,850 cubic yards of dirt.**

Further, the project site is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of various types of land uses and the area is not located in an area identified to contain paleontological or archaeological resources. Any archaeological resources that may have existed near the project site surface are likely to have been disturbed or previously removed. However, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during project grading activities. If previously unknown archaeological resources are found during excavation and grading, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. If archaeological or paleontological resources are discovered during grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

Further, the project site is not identified in the Venice Land Use Plan as a site located within or adjacent to an Environmentally Sensitive Habitat Area (ESHA). The proposed development would be fully developed within the boundaries of the private lots and would not impact sensitive habitat areas. As such, the project conforms to the applicable Land Resources policies of Chapter 3.

Article 6 Development

Section 30250 Location; existing developed area.
(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

The project is located in an existing developed area surrounded by similar residential and commercial uses and will not have a significant adverse impact on coastal resources. Existing infrastructure servicing the existing residences will be used by the proposed development. Utility lines and water pipes will be connected to the proposed development. In addition, the project area is within the service area of the Los Angeles Fire Department Station 63 and the Pacific Division of the Los Angeles Police Department. Primary regional access is provided by the Marina Freeway, Venice Boulevard, and Lincoln Boulevard, which are all accessible within 1.5 miles of the Project Site.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story,

single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the ~~east~~ **west** across Main Street is a three-story condominium constructed in 2008. The property to the ~~west~~ **east**, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources.

Section 30251 Scenic and Visual Qualities.
The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California

Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The architectural character of nearby development includes an eclectic mix of architectural styles including modern and contemporary style buildings. The project's proposed contemporary design fits into the architectural diversity of the neighborhood. The project height, massing and scale of the project is consistent with existing buildings along Main Street. As discussed above, the project would increase the maximum density for the subject site from six dwelling units to 20 dwelling units. The project would increase the maximum building envelope with a height increase of 22 feet and 10 inches, reduction in the residential front yard setback from 5 feet to 0 feet, reduction in the side yards from 8 feet to 5 feet, and increasing the FAR from 1.5:1 to 2.96:1. The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the ~~east~~ **west** across Main Street is a three-story condominium constructed in 2008. The property to the ~~west~~ **east**, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development

context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. Furthermore, the proposed increase in density is consistent with higher density permitted in the underlying adjacent multi-family residential zone and fits within a building envelope that is compatible with the surrounding area. The increase in density and provision of affordable housing in the Coastal Zone is consistent with the California Coastal Commission's policies for increasing housing and affordable housing in the Coastal Zone.

The project's consistency with development standards in the certified Venice LUP is important in assessing the project's compatibility with the character of the surrounding area. The certified Venice LUP states that the development standards also define for each land use designation a density of housing units and lot coverage to maintain the scale and character of existing residential neighborhoods and minimize the impacts of building bulk and mass." (LUP, p.II-2.)

The proposed development complies with Policy I.A.13 (Density Bonus Application) which allows for reduced restrictions for density, height and setback standards as outlined in Policies I.A.1, I.A.8, I.E.1, I.E.2, I.E.3 and II.A.3 of the Venice Land Use Plan (LUP), further discussed in Finding No. 3.b. As such, the proposed development is visually compatible with the character of the surrounding area and will further enhance the visual quality of the area.

Section 30252 Maintenance and Enhancement of Public Access.
The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof

access structure, providing 28 parking spaces.
The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions.

The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street and within 300 feet from the Windward Circle, a Major Transit stop within Venice. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants. The surrounding area is served by Big Blue Bus Route 1 located at the intersection of Main Street and Market Street, Culver City Bus Route No. 1 located at the intersection of Windward Avenue and Main Street, Los Angeles County Metropolitan Transit Authority (Metro) bus line 33 at the intersection of Main Street and Grand Boulevard.

Although the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. As demonstrated in the Parking Demand Management Assessment provided, empirical surveys demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

The proposed project is not located between the first public road and the sea and is located more than a half of a mile from the beach. The proposed project will not interfere with or obstruct the public's right to access to coastal resources. The proposed development will not have any adverse impacts on public access to the coast. No permanent structures will be placed within the public right-of-way and public access to the coast will not be obstructed. The proposed project will neither interfere nor reduce access to the shoreline as the site does not have direct access to any water or beach. As demonstrated in the Parking Demand Management Assessment, the project will not have a significant adverse impact on coastal resources.

Section 30253 Minimization of Adverse Impacts.
New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms

along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The subject site is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, within 5 kilometers of the Santa Monica Fault, and within the Single Permit Jurisdiction of the Coastal Zone.

The project site is also located within an area that may be affected by Sea Level Rise. On August 12, 2015, the Coastal Commission adopted a Sea Level Rise Policy Guidance document, updated and adopted On November 14, 2024. This policy document provides a framework and directions for local jurisdictions to address sea level rise (SLR) in Local Coastal Programs (LCPs) and Coastal Development Permits (CDPs). In May 2018, the City completed an initial sea level rise vulnerability assessment for the Venice Coastal Zone. The report provides that: Existing wide beaches generally protect Venice from coastal hazards. Coastal assets along or near the beachfront are potentially vulnerable during a large storm event in combination with SLR greater than 3.3 feet. After 4.9 feet SLR, beachfront assets are more vulnerable to damage from flooding or potential erosion of the beach. A SLR of 6.6 feet is a tipping point for Venice's exposure to extreme coastal wave events. Beachfront and coastal assets could flood annually, beaches could be greatly reduced in width, and high water levels could greatly increase potential for flooding of inland low-lying areas. As discussed in the analysis, there is considerable uncertainty around the timing of SLR, how coastal processes may be affected, and what adaptation approaches will be applied in the future (VSLRVA, pg. 45). Policies and development standards to address the potential impacts of SLR would be addressed in the City's LCP for the Venice Coastal Zone.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed use would have no adverse impacts on public access, recreation, public views or the marine environment, as the property is located within a developed residential area and located a half mile from Venice Beach. The project will neither 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. As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

Finding 3.b (Page F-12)

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

Coastal Act Section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act. The Venice Local Coastal Land Use Plan ("LUP") was certified by the California Coastal Commission on June 14, 2001; however, the necessary implementation ordinances were not adopted. The City is in the initial stages of preparing the LCP; prior to its adoption the guidelines contained in the certified

LUP are advisory. The subject site is located within the North Venice Subarea with a land use designation of Neighborhood Office Commercial and zoned C2-1-O.

The following are applicable policies from the certified Venice Land Use Plan:

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.10. *Location of Replacement Housing. The replacement units shall be located in one or more of the following areas, listed in order of priority: 1) on the site of the converted or demolished structure; 2) within the site's Venice coastal subarea; 3) within the Venice Coastal Zone; 4) within the Venice Community Plan area east of Lincoln Boulevard; and, 5) within a three mile radius of the affected site.*

Policy I.A.11. *Replacement Ratios for Replacement Units. Replacement ratios shall be at a minimum of 1:1 (one unit replaced for each unit removed). Replacement ratios shall increase according to how far from the affected site replacement units are located as defined in the Mello Act.*

Policy I.A.13. *Density Bonus Applications. Required replacement dwelling units shall be counted as reserved units in any related State mandated density bonus application for the same project.*

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project is subject to the requirement under the Housing Crisis Act (SB 330/SB8) and the City's Interim Administrative Procedures for Complying with the Mello Act (IAP). The Los Angeles Housing Department (LAHD) issued an SB330/SB8 Replacement Unit Determination (RUD) dated October 29, 2025 requiring the replacement of one (1) affordable replacement unit and one (1) market rate unit. As such, the four (4) residential units will be set aside for Very Low Income Households satisfies this requirement. Finding No. 5 provides a full discussion of the requirements under the IAP.

Policy I.A.14. Parking Requirements for Affordable Housing. Reduced parking is permitted for low income units only if: a) the project is consistent with LUP policy I.A.13; and b) it is demonstrated that the prospective occupants of the project will have a reduced demand for parking. However, if a unit changes its status from low or low-moderate income to market rate unit, parking should be provided for market rate units according to the parking standards listed in LUP Policies II.A.3 and II.A.4.

On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. In addition to its close proximity to public transit, the applicant will still

provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

Further, the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. Empirical surveys, provided the Parking Demand Management Assessment, demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

Policy I.B.2. Mixed-Use Development. Mixed-use residential commercial development shall be encouraged in all areas designated on the Land Use Policy Map for commercial use. Residential density in commercial land use designations shall not exceed one unit per 800-1200 square feet of lot area and shall comply with the Floor Area Ratio (FAR) limits set forth in Policy I.B.7. The design of mixed-use development is intended to help mitigate the impact of the traffic generated by the development on coastal access roads and reduce parking demand by reducing the need for automobile use by residents and encouraging pedestrian activity. Such development shall comply with the density and development standards set forth in this LUP.

As discussed in Finding No 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24 U.26. The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Specific Plan, as follows: Increase allowable FAR to 2.96:1 in lieu of 1.5:1, decrease the front yard setback for residential floor area to allow 0 feet, 0 inches in lieu of 5 feet, increase the overall height for a total building height of 52 feet, 10 inches in lieu of 30 feet maximum, remove the step back provisions in lieu of a 45 degree step back plane, and Increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet. As discussed in Finding No. 1, the project qualifies for the requested incentive and waiver. As such, the proposed development is visually compatible with the character of the surrounding area, proposed density bonus, incentives, and waivers are consistent with the applicable policies of the Coastal Act and Venice LUP

<u>Preservation of Venice as a Special Coastal Community</u>

Policy I.E.1. General. Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

Policy I.E.2. Scale. *New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer, and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so*

that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.

Policy I.E.3. Architecture. *Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.*

The proposed project is visually compatible with the character of surrounding areas and sited and designed to protect coastal visual resources. The neighborhood and surrounding properties are developed with multi-family dwellings and commercial structure with zoning classifications of C2-1-O, RD1.-1-O, and C4-1. Surrounding properties include single and multi-story commercial structures and single and multi-story residential structures.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The property is developed with a three-story apartment and a two story fourplex, constructed in 1911 & 1912. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the ~~east~~ **west** across Main Street is a three-story condominium constructed in 2008. The property to the ~~west~~ **east**, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the ~~east~~ **west** across Main Street is a three-story condominium constructed in 2008. The property to the ~~west~~ **east**, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the requested 22 feet, 10 inches above the permitted flat roof height will **not be** materially detrimental to the adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not

reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates

articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

Policy II.C.1. General Non-Vehicular Coastal Access Policy. Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.

The proposed project will provide 28 vehicular parking spaces and 45 bicycle parking spaces. The subject site is located within a half mile of a Major Transit Stop, Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The proposed five story, mixed use structure is consistent with the policies of the Certified Venice Land Use Plan and the standards of the Venice Coastal Zone Specific Plan. The project will not prejudice the ability of the City to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act.

Findings 4.a.1

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

The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The subject site adjoins an unnamed alley at the rear. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. The proposed development is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault.

The subject property is located within the Venice Community Plan area with a Neighborhood Office Commercial Land Use Designation. The subject property is also located within the area of the Venice Coastal Land Us Plan certified by the California Coastal Commission and adopted as a plan amendment to the Venice Community Plan. The subject property is also located within the North Venice Subarea of the Venice Coastal Zone Specific Plan, the Los Angeles Coastal Transportation Corridor Specific Plan, and within the Single Permit Jurisdiction area of the California Coastal Zone.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the ~~east~~ **west** across Main Street is a three-story condominium constructed in 2008. The property to the ~~west~~ **east**, across the abutting alley, is zoned RD1.5-1-

O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice’s established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

Planning CPC <cpc@lacity.org>

CPC Agenda Item 1, Director's Report on the University Park Survey (March 12, 2026)

daveraposa@aol.com <daveraposa@aol.com> Wed, Mar 11, 2026 at 4:14 PM
To: Planning CPC <cpc@lacity.org>
Cc: "Councilmember.Hernandez@lacity.org" <Councilmember.Hernandez@lacity.org>, "Kyle.Hickey@lacity.org" <Kyle.Hickey@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>

March 11, 2026

City Planning Commission
CPC@lacity.org
Cc: Councilmember.Hernandez@lacity.org;
Kyle.Hickey@lacity.org
Kevin.keller@lacity.org

RE: Agenda item 1, Directors Report, CPC meeting, March 12, 2026

Dear Commissioners:

I am the Chair of the University Park HPOZ. Today, technically, I am writing you as an individual but since the HPOZ Board has voted on this numerous times, I do ask the CPC to direct the Planning Department to take steps to do a Technical Correction in order to amend the University Park HPOZ survey (as the Court ordered in Hancock Park – but here limited to Non-Contributors dating from the Period of Significance), and not just "receive and file" today's Director's Report.

I would also like to point out that, between CPC's action in December and now, staff has NOT made this an agenda item for discussion at the University Park Board, even though it appears staff was actively preparing a presentation (if not a report).

Again, we have long asked for a revision to the original survey, since regarding the "*oldest of the old*" Non-Contributors it was both inaccurate and also incomplete (for example, the property at 2114 Bonsallo, an 1892 residence, was simply not included in the original Survey; staff eventually added it when there was a code enforcement conflict). Many early (Victorian era) residences were improperly identified as non-contributors based on being stuccoed (for instance) and therefore were deemed to require an "economic miracle" to restore them. However, in a lawsuit involving the Hancock Park HPOZ, the Court found that the "economic miracle" standard used in the Historic Resources Survey to determine the reversibility of prior alterations was not a proper standard and that every property or structure evaluated using that standard should be re-evaluated.

The historic consultant used the same "economic miracle standard" in the University Park survey, as the record shows.

Since Hancock Park was indeed resurveyed to reflect the Court's decision regarding misuse of the economic miracle criteria, so should University Park's Non-Contributors be resurveyed, if only for parity.

The Director's Presentation makes clear that there isn't OHR staff available to prepare a complete new survey. But it does not address the cost of surveying only the Non-Contributors dating from the period of significance, or even by prioritizing in phases by the date of construction beginning with the oldest – 1800s – first, as recommended by the University Park Board 15 years ago. There is no reason to resurvey the balance of the properties.

One economical option is to continue with the process which began with the HPOZ Board review and a subcommittee of experts which began the update process. The University Park HPOZ Board instituted its own re-evaluation process in 2011, including updated NPR sheets prepared by professional historic consultants (working as volunteers). The data was received, reviewed and approved by the HPOZ Board at that time for its proposed Phase I, which looked at the oldest 21 buildings (all from the 1800s) which were labeled Non-Contributors. City Planning did not move forward then.

This Presentation from OHR today is a start and I hope not a final closure. When the UP HPOZ was before the Council in 1999, Robert Duenas of City Planning stated some of the errors in the survey would be corrected. Very few were.

I ask that the Commission and OHR to think outside the box and not let budget issues interfere with the purpose of the HPOZ Ordinance and the mission statement, goals and objective of the University Park Preservation Plan. Importantly, a targeted, updated Technical Correction focused on the identified oldest structures would cost far less than the $100,000 full – and unnecessary – resurvey. It should also be noted that the University Park HPOZ has been effective in supporting and approving affordable infill housing while fulfilling its mission.

Thank you for your consideration.

David Raposa

Cell: 323-573-4202

ADAMS DOCKWEILER HERITAGE ORGANIZING COMMITTEE

City Planning Commission
Public Hearing / Director's Report / Item 1
Los Angeles City Hall / John Ferraro City Council Chamber
200N. Main Street Los Angeles Calif. 90012
Date: March 12, 2026

Honorable Commissioners.

Thank Goodness! It's finally out in the open! I have been working to make this happen for over 25 years. The issue of the Office of Historic Resources' continuing abuse of the University Park HPOZ is being heard outside the OHR's own management manipulations.

Thank you, Commissioners, for doing your job as appointed stewards: listening, asking questions, and taking action. Like the rest of the University Park community, I was disappointed by your reluctant decision to deny the Appeal of WAHA and approve the permit issuance for demolition and infill replacement at 1015 W.21st Street – UP-HPOZ (12/11/25).

We understand however the immense pressure all decision makers are under today by the City's Attorney's Office. That their insistence that the avoidance of potential developer-litigation is the First Priority of any decision is overpowering. Attending public hearings to only watch decision makers agonizing over their conflict between voting for the truth or possible financial ruin should not be what the administrative process seeks to achieve.

The questions this Commission raised, in response to our community's revelation about OHR's flawed Historic Resource Survey and its impacts echoed those of the UP-HPOZ Board and the affected property owners. Your request for the OHR to investigate and report back was a long-sought victory for University Park. This is the first time that our issues will be given a public format outside OHR's insulated environs and rest assured, we will use this action to stimulate additional reviews and hearings. Thanks again.

Today's Director's Report as viewable on the public agenda is, not surprisingly, a bureaucratic evasion. Reporting that OHR is understaffed is nothing new. Claiming that the City's financial crisis prohibits action is nothing new. The non-explanation of why the UP-HPOZ is not being treated in the same manner as Hancock Park and Windsor Square is nothing new.

I ask that once again you, as Commissioners, ask WHY? Why have the changes needed to protect mis-identified historic properties as Non-Contributors been awarded to Hancock Park and Windsor Square and not University Park? Court rulings seem to the only rationale for action as can be discerned by the following:

Proposed Revisions to the Hancock Historic Resources Survey

- *Following a legal challenge to the Windsor Square HPOZ and Preservation Plan, the Los Angeles Superior Court ruled that the City of Los Angeles set aside and vacate its decision to approve the Windsor Square Historic Resources Survey and adopt the Historic Preservation Overlay Zone and Preservation Plan, because the City failed to comply sufficiently with the California Environmental Quality Act (CEQA) in the adoption of the HPOZ.*

- *The Court also found that the "economic miracle" standard used in the Historic Resources Survey to determine the reversibility of prior alterations was not a proper standard and that every property or structure evaluated using that standard should be re-evaluated.*

- *As a result, the City Council approved a motion on May 9, 2007 directing the Planning Department to re-evaluate the environmental clearance and Historic Resources Survey for the adopted Hancock Park HPOZ, and if necessary, to prepare a new environmental clearance and revised Historic Resources Survey.*

- *Buildings that are altered but still convey their historic architectural style according to the guidance set forth in National Register Bulletin 15 were assigned the evaluation code and criterion of "AS-Contributing Altered Structure" in the Hancock Park HPOZ Historic Resources Survey.*

- *Although the Court instructed the Department of City Planning to re-evaluate only those properties using the "economic miracle" standard, the Department opted to re-evaluate the entire survey to ensure consistency among all three designations: 1) Contributing, 2) Contributing-Altered, and 3) Non-Contributing. The Department has also conducted additional site visits to capture work undertaken on properties after the original Survey was completed. As a* result, the Department of City Planning is recommending the attached designation changes.

These are the facts:

- Between 1998 and 2007 the City hired Consultants Myra Frank & Associates to research, evaluate and define several historic neighborhoods as potential Historic Preservation Overlay Zones including Windsor Square, Hancock Park, and University Park. **Their evaluation criteria were flawed using an "economic-miracle" condition in determining whether a property was either a Contributing-Altered or a Non-Contributor.**

- **Successful Lawsuits challenging the use of the "economic miracle" condition were made against the Windsor Square and Hancock Parks historic districts' surveys**. The Courts found against the City and required that the Historic Surveys be corrected.

- The Courts' instructions only required OHR to review and correct, where necessary, those Non-Contributors that were affected by the application of the "economic miracle" condition. **The City, however, OPTED to re-evaluate the entire survey.**

When the University Park HPOZ Board instituted its own re-evaluation process in 2011 the following data was received, reviewed and approved as part of Phase I :184 Non-Contributing Structures, 109 NC Structures of those were from the Period-of-Significance, 100 of those were a "economic miracle", approximately 20% of those will still be found to remain as Non-Contributors when evaluated by the Secretary of the Interior's National Register Bulletin-15.

The remaining 80 NCs are further reduced by the 21NC Structures that were formally re-evaluated by the UP-HPOZ Board Consultants. 16 of the 21 were formally approved by the UPHPOZ Board as now being Contributing-Altered. This only leaves a potential remainer of 59 structures to be additionally processed as a Contributed Altered.

The West Adams preservation community can and will deal with 59 historic properties if the OHR cannot. Pease ask the Director why he has continually denied a collaborative resolution to a ministerial action.

Respectfully yours,

Jim Childs Chair, Adams Dockweiler Heritage Organizing Committee
213-747-2526 / jeanjim2341@att.net
2341 Scarff Street, Los Angeles CA 90007

WAHA
West Adams Heritage Association

March 11, 2026

City Planning Commission
Public Hearing / Director's Report / Item 1
Los Angeles City Hall / John Ferraro City Council Chamber
200N. Main Street Los Angeles CA 0012

Honorable Commissioners

First thank you for your interest in the University Park HPOZ and the impacts of the non-contributor status of certain buildings in the existing survey. When listed as a non-contributor, the vintage housing is vulnerable to demolition in this era of efforts at streamlining and state laws which only recognize locally designated historic structures.

When the University Park Presrevation Plan stated:

Non-Contributing - from period of significance
Non-contributing structures that date from the period of significance are struc-tures that were built in the same time period as contributing structures, but they have not retained their historic character through subsequent alterations or additions. As such, elements from both the Rehabilitation Guidelines and the Infill Guidelines in Chapter 8, will apply to these structures where appropriate.

the Community believed that this language provided significant enough protection at that moment for those buildings designated as NCs. However, the demolition of 1015 w. 21 Street demonstrates that this was not the case. The recent emphasis by state law on only recognizing locally designated structures enhances the risk of losing the character defining features of the zone.

It underscores the need to have a technical correction or survey update of those NC structures from the period of significance of the HPOZ to afford them some protection.

In the Hancock Park HPOZ, the Court found that the "economic miracle" standard used in the Historic Resources Survey to determine the reversibility of prior alterations was not a proper standard and that every property or structure evaluated using that standard should be re-evaluated.

The consultant used the same "economic miracle standard" in the University Park survey as the record shows.

This Presentation from OHR today is a start and we hope not a final closure. When the UP HPOZ was before the Council in 1999, Robert Duenas of City Planning stated some of the errors in the survey would be corrected. Very few were.

We ask the CPC to direct the Planning Department to take steps to amend the HPOZ survey (as it did in Hancock Park.) One economical option is to continue with the process which began with the HPOZ Board review and a Subcommittee of experts which began the update process. The University Park HPOZ Board instituted its own re-evaluation process in 2011 the data was received, reviewed and approved for Phase I which looked at the oldest 21 buildings.

In total there were 184 Non-Contributing Structures, 109 NC Structures of those were from the Period-of-Significance.

Absent the economic miracle criteria, many NCs will meet the following standard: (from National Register Bulletin 15)

"A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible [read: contributing) if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible [read: contributing, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style ... If the historic exterior building material is covered by non-historic material (such as modem siding), the property can still be [contributing] if the significant form, features, and detailing are not obscured."

In the first phase of the 2011 Board review, 80% of the structures reviewed were found to be eligible for Contributor altered status. [1] At the time, planner Matt Glesne observed "there ought to be a simpler way to make a correction." The process stalled when OHR staff insisted on taking all 109 in review and did nothing to move Phase 1 forward.

There are ways to proceed that will not incur substantial cost and yet protect the integrity of the process. WAHA and others are prepared to provide some funds for this effort. In the NUP Specific Plan the survey was undertaken by volunteers and supervised by consultant Ralph Iredale. This survey, funded by a state SHPO grant, was the basis for the creation of the North University Park Specific Plan which operates as an HPOZ.

We ask OHR to think outside the box and not let budget issues interfere with the purpose of the HPOZ Ordinance and the mission statement, goals and objective of the University Park Presrevation Plan It should also be noted that the University Park HPOZ has been effective in supporting and approving affordable infill housing while fulfilling its mission statement:

> *To maintain and enhance the quality of life and sense of place and character in the University Park HPOZ (UPHPOZ) area, using preservation principles as a planning and management tool and stabilizing the community for future generations. The UPHPOZ shall: promote education by encouraging interest in the cultural, social, economic, political, and architectural phases of its' history; preserve and enhance the buildings, structures, Natural Features, sites and areas which are reminders of University Park's history and unique and irreplaceable assets to the City; insure that new development will fit into the existing neighborhood by respecting it's surrounding architectural context, appropriate setting and environment; develop and maintain the appropriate settings and environment to preserve these buildings, structures, Landscaping, Natural Features, and areas; provide Guidelines for both existing and new development; secure the economic benefits of preservation; enhance property values; gain the cooperation of other government bodies whose decisions affect the area's physical character; and ensure that all procedures comply with the California Environmental Quality Act (CEQA).*

WAHA thanks the CPC and Commissioners and OHR for their presentation and ask that a survey correction process proceed,

Jean Frost, Vice President, West Adams Heritage Association, c/o 2341 Scarff Street, LA, CA 90007

[1] A subcommittee of 3 (consisting of 2 preservation consultants and a Board member) went on site for each NC, provided an evaluation sheet, and then made a recommendation to the UPHPOZ Board which reviewed and adopted by motion the findings.

Planning CPC <cpc@lacity.org>

March 12 CPC Meeting, Agenda Item 1

Jim Robinson <jim@robres.com> Wed, Mar 11, 2026 at 8:16 PM
To: Planning CPC <cpc@lacity.org>
Cc: Councilmember Hernandez <councilmember.hernandez@lacity.org>, "Kyle.Hickey@lacity.org" <Kyle.Hickey@lacity.org>

Dear Commissioners

We're very grateful for the commmissioners' and planners' attention to correcting the contributor status of properties within the University Park HPOZ.

Our HPOZ was an early one, and its survey, while much appreciated, included some false assumptions about the ability or inability to restore altered properties. In particular, the survey could not have anticipated the future increase in property values that would make restoration of altered properties financially viable.

We are currently the owners of eight contributors within the HPOZ, including two designated monuments and including a property (663 W. 23rd Street) whose previous owner was able to get its designation changed from non-contributor to contributor-altered. There are many more properties whose status should likewise be corrected.

One of our buildings, built in 1906, required removing inappropriate stucco from the entire 3-story exterior and replacing every window (aluminum) with custom-made, double-hung wood windows and trim. Also a new roof, foundation, wiring, plumbing, HVAC, insulation, interior walls, doors, etc. etc. After all the expense, our investment shows an excellent return.

It makes no sense that the current survey designates some buildings as non-contributors simply because they have inappropriate stucco or the windows have been replaced. It's tragic when such buildings are demolished simply because an outdated - or mistaken - survey designated them incorrectly.

Our neighborhood contains many of Los Angeles' oldest and most significant historic structures. Please re-survey our "non-contributors" by today's standards, and help us keep them, where appropriate, for future generations.

Sincerely

Jim and Janice Robinson
27 St. James Park
Los Angeles, CA 90007-2521
(213) 663-3022

March 11, 2026

Subject: Coffee with the CPC, Directors Report, Agenda Item No. 1 of Interest-Office of Historic Resources, University Park HPOZ historic resource survey

Dear Committee -

Thank you for sharing the information on the University Park HPOZ update

I wholeheartedly support the correction of the UP HPOZ Historic survey.

I am a native Angeleno, a homeowner in Council District 1 and the founding director of a community arts cultural nonprofit–The Velaslavasay Panorama– which has been headquartered in Council District 8 for the past twenty years, and prior to that was located in Council District 13 from 2000-2004.

I make my home in the University Park HPOZ in Council District 1 on 21st street and have been an engaged homeowner and citizen for over the past decade.

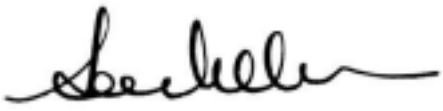
CPC, please direct the Planning Department to proceed with amending the HPOZ survey here in University Park as was done in Hancock Park. One economical way to proceed with this work is to continue the process that was began by the HPOZ Board review in partnership with a subcommittee of experts who already began the update process. The University Park HPOZ Board instituted its ownre-evaluation process in 2011 the data was received, reviewed and approved for Phase I which looked at the oldest 21 buildings.

In the Hancock Park HPOZ, the Court found that the "economic miracle" standard used in the Historic Resources Survey to determine the reversibility of prior alterations was not a proper standard and that every property or structure evaluated using that standard should be re-evaluated.

The consultant used the same “economic miracle standard” in the University Park survey as the record shows. The information shared thus far is a great start and I hope not a final closure in this matter.

Thank you for the opportunity to share my thoughts.

With Best Regards,



Sara Velas
Homeowner CD1 University Park HPOZ
Director, Velaslavasay Panorama

Planning CPC <cpc@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF - 1410-1422 Main St

chambers.cindy@gmail.com <chambers.cindy@gmail.com> Thu, Mar 12, 2026 at 12:41 AM
To: cpc@lacity.org
Cc: Sienna Kuo <sienna.kuo@lacity.org>

Planning Commissioners and Council staff --

I am writing today to urge you to stand with your constituents and oppose the proposed development at 1410-1422 Main Street in Venice. I am a disabled senior woman who frequently uses Toledo Court—the tiny alley these developers intend to take over. I'm genuinely concerned how I will be able to navigate the increased traffic and significant safety issues this will pose for me and my dogs.

Both the **LUPC** and the **Venice Neighborhood Council** voted **unanimously** to oppose the project because of ***unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility***. **I strongly agree with their findings and urge you to take them seriously.**

- **Vehicular Accessibility:** Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.
- **Height of project:** Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.
- **Lot consolidation:** A 3-lot consolidation is not permitted.
- **Provides no Public Setback on Main Street:** Needs better pedestrian circulation and the possibility to add more public green space on Main Street.
- **The law prohibits the demolition or conversion of residential structures** for purposes of non-residential/mixed-use projects.
- **Accessibility fails** to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
- **Open Space:** The project requests a 100% reduction in usable open space and eliminates the step-back provisions.
- **Design:** The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.
- **Impact on Coastal Access:** The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons, I respectfully request that you go on the record and oppose the project.

Thank you for your time and consideration.

Sincerely,

Cindy Chambers
310-430-0581

Mar 11, 2026

City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012

Re: Proposed Housing Development Project at 1410-1420 South Main Street / CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

To: cpc@lacity.org;

Cc: Sienna Kuo, Planning Assistant, sienna.kuo@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org;

Dear Los Angeles City Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 20-unit housing development project at 1410-1420 South Main Street, which includes 4 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), AB 130, and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id*. at subd. (d)) or reduce the project's density (*id*. at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id.* at subd. (b).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to a floor area ratio increase, northwesterly side yard decrease, southwesterly side yard decrease, zero foot front yard setback for the residential floor area, increase of the maximum allowed building height, remove the step back provisions, and an increase in the allowed exterior roof access structure dimensions. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id*. at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City "may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes 'amenities' beyond the bare minimum of building components." (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66). Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring

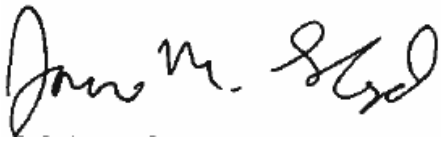
new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

Planning CPC <cpc@lacity.org>

CPC-2021-2020-DB-CDP- SPPC-MEL-HCA 1410 – 1422 South Main Street

David Ewing <moreseriousbus@gmail.com>
To: cpc@lacity.org

Wed, Mar 11, 2026 at 2:30 PM

CPC-2021-2020-DB-CDP- SPPC-MEL-HCA

1410 – 1422 South Main Street

March 11, 2026

Honorable Commissioners:

There are two things I don't understand about the combined cases before you:

1) I don't understand how a project that strays so far from the planning rules can find its way before this commission in an attempt to waive or undermine regulations that protect our built environment. These instances are ably detailed in the Venice Neighborhood Council Land Use and Planning Committees findings.

2) I also don't understand how a planner's report with obvious, careless, and consequential factual errors can provide a legitimate basis for a hearing. I won't go over them here, as they are addressed in the rebuttal letter submitted by the project's neighbor at 234 Horizon Ave, Rick Garvey. Suffice it to say they evidence a lack of the basic familiarity with the project site and its surroundings that is necessary to make informed judgements about the effects that this non-conforming project would have on its surroundings and on precedent for future projects.

Yours truly,

David S. Ewing

1234 Preston Way,

Venice

Planning CPC <cpc@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

Emily Owens <emowens25@gmail.com>
To: CPC@lacity.org

Thu, Mar 12, 2026 at 9:15 AM

Hi, my name is Emily Owens, and I live near the 1410 Main St project site.
I'm not opposed to development of this site, but I am deeply concerned that this project brings far more traffic and parking demand than our small streets and alley can handle.

When I heard that this project includes only 28 parking spaces for 20 apartments plus retail, and that the project proposes to use Toledo Court alleyway as the main ingress/egress point, I was shocked. It is clear to me that the developers put no real critical thinking into this plan and are not prioritizing the local Venice community.

Toledo Court is extremely narrow, and it's already difficult for cars to pass, let alone garbage trucks, delivery vans, or emergency vehicles. I drive a Mini Cooper and often have difficulty navigating this alley. Adding four restaurants and dozens of residents will increase congestion, double-parking, blocked garages, and circulation hazards.

Parking is already scarce for everyone on this block. With only 28 spaces for a project of this size, it's completely unrealistic to assume patrons, employees, and residents won't spill over into nearby streets.

I am requesting that this Council recognize that our infrastructure can't support this level of intensity and request a safer, more appropriate design that will not harm the residents of Venice.

Thank you,

Emily Owens, Ph.D.

233 Market St. Unit A, Venice CA 90291

11 March 2026

To: Los Angeles Planning Commissioners and staff
From: Irv Katz
Re: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

I have previously written to voice my opposition to the above referenced proposed development located at 1410-1422 Main St. in Venice.

It has been brought to my attention that a Planning Commission report is recommending approval for the project, despite the fact that the Venice Neighborhood Council and Land Use and Planning Committee unanimously voted to recommend denial of the project.

During the VNC and LUPC meetings that I attended as well as the Planning Commission hearing I attended, I don't recall one person providing positive commentary for this development.

So I can only assume that Planning staff report totally ignored neighborhood input and has been influenced by other factors. Does the Planning Commission propose that it knows better what is good for our neighborhood? Are you telling us to just shut up and learn to live with it? If so, you don't know Venice.

Irv Katz
moeshepard@aol.com

Planning CPC <cpc@lacity.org>

Um, no

Jeremy McCreary <jmccreary8@gmail.com> Tue, Mar 10, 2026 at 10:09 AM
Reply-To: jmccreary8@gmail.com
To: cpc@lacity.org

Hi, I'm emailing you about the proposed property in Venice at 1410 - 1422 Main Street

It's obviously too high. OBVIOUSLY. With or without the solar trellis.

Yeah there are other taller-ish buildings in the AREA, but not the NEIGHBORHOOD where this is in. Doesn't matter if down the road or across the street there's also a tall building.

Here are some excerpts I challenge:

> Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

That average DOES reflect where this building will go. Have you been here? Have you seen it? Like, REALLY seen it.

> The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

46 feet is CLOSE ENOUGH to 21.9 of the neighborhood? AHAHAHA That's ridiculous! It's obvious! It's more than DOUBLE even if we were buying the "yeah but the fifth floor is like an open patio so doesn't really count" argument. Ahahaha, no.

This faulty reasoning is in the determination letter twice in a row!

constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources.

Section 30251 Scenic and Visual Qualities.
The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The architectural character of nearby development includes an eclectic mix of architectural styles including modern and contemporary style buildings. The project's proposed contemporary design fits into the architectural diversity of the neighborhood. The project height, massing and scale of the project is consistent with existing buildings along Main

Street. As discussed above, the project would increase the maximum density for the subject site from six dwelling units to 20 dwelling units. The project would increase the maximum building envelope with a height increase of 22 feet and 10 inches, reduction in the residential front yard setback from 5 feet to 0 feet, reduction in the side yards from 8 feet to 5 feet, and increasing the FAR from 1.5:1 to 2.96:1. The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a

setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-

Hahaha are y'all for real?

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

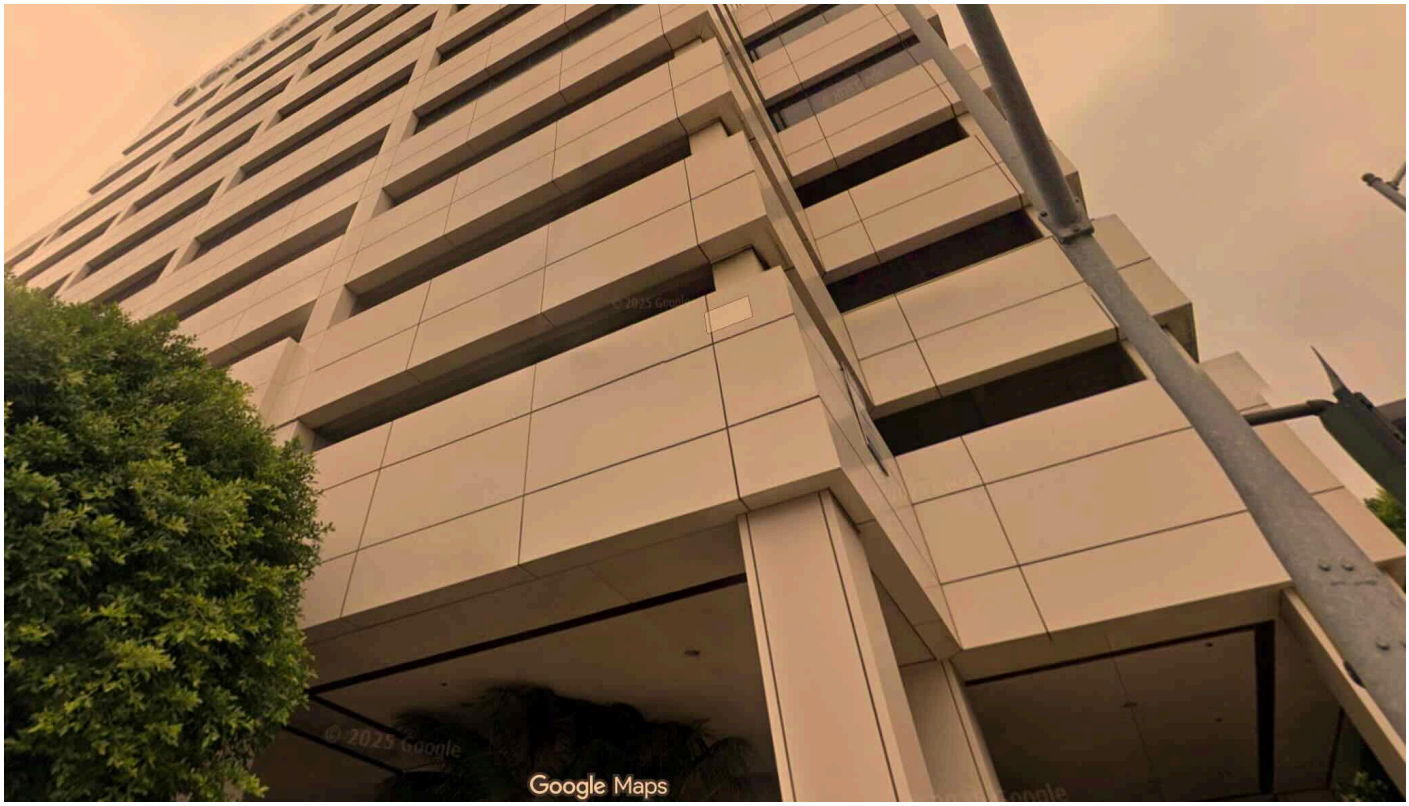
I KNOW you know the neighborhood doesn't want it. People far, FAR from this community want it. Please do not facilitate them.

Obviously - OBVIOUSLY - this will be used as precedent for MORE of this. I'm sure you've seen it in your career!

We ain't goin down without a fight! It's not even personal. It's about defending our home against basic money grubbers from OC and a realty firm whose building looks like THIS (at bottom, see the similarity?).

Surely you can empathize? I keep using the word OBVIOUS because it is and you must "get" what's happening here. We do too.

Respectfully,
Jeremy



Crest Real Estate's office building. Barf.

Planning CPC <cpc@lacity.org>

DENY 1410-1422 Main Street, Venice — The Historic Lost Canals District's Very Own Beverly Center?

KEVIN KERSLAKE <kevinkerslake@mac.com> Thu, Mar 12, 2026 at 1:11 AM
To: sienna.kuo@lacity.org, Juliet.Oh@lacity.org, vince.bertoni@lacity.org, Ira.Brown@lacity.org, CPC@lacity.org, sean.silva@lacity.org, craig.bullock@lacity.org

Greetings,

Should Traci Park and others involved in city planning opt to go against the wishes of the VNC, LUPC, and nearly every resident in the iconic neighborhood of the Historic Lost Canals District and approve the monstrosity at 1410-1422 Main, they will take their place in infamy alongside the LA officials who betrayed Abbot Kinney back in the day.

I am by no means anti-development, but this project has rightly been rejected over and over again through the years because it is completely out of character with the neighborhood. Even in the smaller scale iterations that have been proposed in the past, it was rejected for being grossly out of step with the Venice Specific Plan — as was the case most recently when LUPC and VNC both unanimously rejected it yet again. So it defies reason that a much bigger proposal which is nearly double the size of earlier proposals would suddenly curry favor with Traci Park and city planners. Even in an era rife with political corruption, a sudden about-face on this obscene project that *doubles* the height limit and triples mass, among its many other flaws, comes with a particularly foul stench.

Akin to putting up a Beverly Center-scale monstrosity on the sunny, open-air side of the historic neighborhood which arrogantly, greedily humiliates the letter and spirit of the Venice Specific Plan, history will not look kindly upon this travesty…and anyone who votes it forward.

Please do the right thing and reject this project in its current form.

Sincerely,

Kevin Kerslake
221 Market Street
Venice, CA 90291

Crest Real Estate, LLC
11150 W. Olympic Blvd., Suite 700
Los Angeles, CA 90064
310.994.6657 office

March 10, 2026

VIA EMAIL (CPC@LACITY.ORG)

President Lawshe and Hon. Members of the
Los Angeles City Planning Commission
City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 340
Los Angeles, CA 90012

RE: Response to Public Comments
1410-1422 S. Main Street Mixed-Use Housing Development Project; Case No. CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; Environmental Case No. ENV-2021-2021-CE

Dear President Lawshe and Hon. Members of the City Planning Commission:

Crest Real Estate, LLC represents the Applicant, Three On The Tree, LLC ("Applicant"), in connection with the above-referenced project at 1410-1422 S. Main Street, Venice, California 90291 ("Project"). We write to provide clarification in response to several issues raised in public comments by nearby residents and neighborhood stakeholders regarding the Project. The comments primarily relate to project access, neighborhood scale, and transportation screening. As discussed below, the administrative record and technical analyses demonstrate that these issues have been addressed through project design and compliance with applicable City and State regulations.

I. Alley Access

Several public comments raise concerns regarding the use of the rear alley for vehicular access, deliveries, and service functions. However, access from the alley is consistent with both the Venice Land Use Plan (LUP) and the Venice Specific Plan, which prioritize minimizing curb cuts and preserving public on-street parking along commercial corridors.

Venice LUP Policy I.B.7 directs that vehicular access be provided from alleys where feasible to minimize curb cuts and protect public on-street parking. This approach is also consistent with the Venice Specific Plan's objective to maintain pedestrian-oriented commercial streets and minimize vehicular conflicts along Main Street.

Consistent with this policy, the proposed project locates vehicular access along the existing alley rather than introducing a new curb cut along Main Street. Providing access from Main Street would require removal of four (4) existing curbside parking spaces along a commercial corridor. Maintaining alley access therefore preserves existing public parking and supports pedestrian activity along Main Street.

II. Neighborhood Character and Scale

Several public comments express concern that the proposed project would be out of scale with the surrounding neighborhood or inconsistent with the character of Venice. However, the surrounding area contains a mix of multi-story residential and mixed-use buildings that reflect the evolving character of Venice's commercial corridors.

For example, a recently approved residential project located at 657-659 Sunset Avenue in the Venice neighborhood consists of a 4-story, 25-unit apartment building approved by the Los Angeles City Planning Commission in the RD1.5 residential zone rather than along a commercial corridor. The project was subsequently appealed to the California Coastal Commission, where appellants raised concerns regarding the building's scale, bulk, density, parking supply, and compatibility with the surrounding neighborhood.

After reviewing the appeal, Coastal Commission staff determined that the appeal did not raise a substantial issue with respect to the project's consistency with the Chapter 3 policies of the Coastal Act, concluding that the approved project was appropriately located in an area capable of accommodating residential density and that it would not significantly adversely affect the community character of Venice. Coastal Commission staff therefore recommended that the Commission find that the appeal raised "no substantial issue."

III. Transportation Screening and Restaurant Uses

Public comments also question whether restaurant uses were properly considered in the project's transportation screening. Fehr & Peers prepared the transportation screening using LADOT Transportation Assessment Guidelines and the City's VMT Calculator. The project generates approximately 86 daily trips when local-serving retail uses are excluded.

Under LADOT guidelines, local-serving retail trips may be excluded from the 250-trip screening threshold. Accordingly, no Transportation Assessment or VMT study is required. Even if restaurant uses are conservatively included, the approximately 2,565 square feet of restaurant space would generate roughly 209 daily trips, which remains below the 250-trip screening threshold.

IV. Conclusion

Public comments raise questions regarding alley access, neighborhood scale, and transportation impacts; however, the project's design is consistent with the Venice Land Use Plan and Venice Specific Plan, preserves on-street parking by utilizing alley access, and remains below the LADOT threshold requiring additional transportation analysis. In addition, the recently approved 657–659 Sunset Avenue project demonstrates that similar mid-rise residential development is compatible with the surrounding neighborhood context. For these reasons, the Applicant respectfully requests that the Commission adopt the staff recommendation and approve the Project.

Sincerely,

Nick Leathers
Executive Project Manager
Crest Real Estate, LLC
on behalf of the Applicant

Planning CPC <cpc@lacity.org>

Fwd: Request to Oppose and Deny "CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St"

Steve Day <steve@hillsartists.com> Wed, Mar 11, 2026 at 9:11 AM
To: "cpc@lacity.org" <cpc@lacity.org>

Oops had CTC written*

thanks,
Steve

Begin forwarded message:

From: Steve Day <steve@hillsartists.com>
Subject: Request to Oppose and Deny "CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St"
Date: March 11, 2026 at 12:47:15 PM GMT-3
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, vince.bertoni@lacity.org, Ira.Brown@lacity.org, CTC@lacity.org, sean.silva@lacity.org, craig.bullock@lacity.org, Jeff.khau@lacity.org, councilmember.park@lacity.org
Cc: smallstreetsbighearts@gmail.com

To the Planning Commissioners and Council Staff,

As a 5yr resident of the neighborhood who will be directly affected, I am writing to urge you to stand with the constituents you represent and oppose the proposed development in Venice at 1410-1422 Main Street.

Both of the LUPC and the Venice Neighborhood Council voted unanimously to oppose the project because of a series of unresolved concerns that included but were not limited to neighborhood compatibility, safety, height, mass, parking, and alleyway access. I, and the community, strongly agree with their findings and urge you to take their findings and this opposition seriously.

A list of the shortcomings that has been put together is here:

• Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.
• Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.
• Lot consolidation: A 3-lot consolidation is not permitted.
• Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.
• The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.
• Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
• Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.
• Design: The project fails to “harmonize” Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.
• Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons outlined, I and my fellow community members, respectfully request that you go on the record and oppose the project.

Many thanks in advance for your thoughtful consideration and time with this matter.

Sincerely,

Steve Day
232 Horizon Ave. #4
Venice, CA 902921

Mar 11, 2026

City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012

Re: Proposed Housing Development Project at 1925 West Montrose Street
DIR-2023-2337-TOC-HCA-M1-1A

To: cpc@lacity.org;

Cc: Erick Morales, Planning Assistant, erick.morales@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org;

Dear Los Angeles Planning Commision,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 19-unit housing development project at 1925 West Montrose Street, which includes 2 Extremely Low Income units. These laws include the Housing Accountability Act ("HAA"), AB 130, and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id*. at subd. (d)) or reduce the project's density (*id*. at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id*. at subd. (b).)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the

CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66). Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

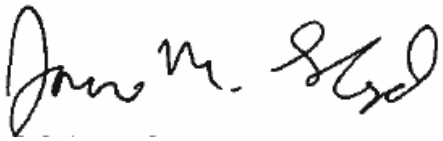
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

EDGAR AND CARMEN GRAZZIANI
22667 Mason Court – Santa Clarita CA 91350

Subject: CEQA Evaluation of Class 32 Exemption, Height Modification, and Evidence of Potential Environmental Impacts, TOC.

Case No.: DIR-2023-2337-TOC-HCA-M1

Appeal to Director's Determination TOC Affordable Housing Incentive Program Modification Entitlement.

Project: Proposed 5-Story, 19-Unit Residential Development (67-Foot Height)

Location: 1925 W Montrose, Los Angeles, California 90026

Prepared by: Adjacent Property Owner – 1929 Montrose St., Los Angeles, 90026

Date: March 11, 2026

1.0 PURPOSE

This memorandum evaluates and appeals the City's determination to:

1. Approve a 22-foot height increase (from 45 feet to 67 feet), and

2. Apply a CEQA Class 32 (Infill Development) Categorical Exemption based on a finding that no exception under CEQA Guidelines Section 15300.2 applies.

2.0 PROJECT BACKGROUND AND PROCEDURAL HISTORY

The project was originally permitted on 5/2/2025 for a 4-story, 19-unit TYPVE VA Affordable Housing (2 ELI) Apartment over 1 story type IA parking over 1 level Type IA basement parking per LAMC 12.22.A.31, 45-foot-tall structure. The City subsequently approved a 22-foot height increase, authorizing a 67-foot, five-story building under the Transit Oriented Communities (TOC) Affordable Housing Incentive Program.

It is also relevant that the previous property owner of the same property was denied approval for a two-story apartment building, while the current developer is granted a five-story, 67-foot structure with limited parking and increased density. This inconsistency raises concerns regarding procedural fairness and the adequacy of environmental review.

3.0 CONSTRUCTION-PHASE CONDITIONS AND UNUSUAL CIRCUMSTANCES

During the excavation phase, the project experienced a significant structural issue along the right-side property line. The shoring system installed to support the excavation was evidently inadequate and may have shown signs of potential failure toward the neighboring apartment building. Subsequently additional support pipes were installed to prevent collapse. This condition should be documented in the City's inspection records, as it reflects a geological and or material construction problem affecting the stability of the shared boundary.

Despite these issues, the project was later approved as a five-story structure under a Class 32 Categorical Exemption pursuant to CEQA Guidelines Section 15332. However, Class 32 requires that

infill projects not result in significant impacts related to traffic, noise, water demand, or public safety. Based on existing conditions in the surrounding area, it is difficult to understand how this exemption was applied.

The proposed 19-unit building provides only 23 parking spaces for 2- and 3-bedroom units. The adjacent 16-unit apartment building to the right provides approximately one parking space per unit, and tenants from that building already park on surrounding streets due to insufficient on-site parking. Street parking in the area is severely constrained; vehicles routinely park in red zones, near fire hydrants, and in locations that prevent street sweepers from cleaning. This condition exists across more than a 10-acre area.

In addition, another 39+-unit apartment building is nearing completion within close proximity. The cumulative effect of these developments will further intensify parking shortages, traffic circulation issues, noise, and public safety concerns.

Given these circumstances, it is unclear how the City determined that the project qualifies for a Class 32 exemption when the evidence indicates potentially significant impacts on traffic, noise, water demand, and neighborhood safety. These impacts directly affect adjacent properties, including my own, which has already experienced physical damage and will experience substantial loss of privacy due to the height and window placement of the proposed structure.

We believe that the subsequent approval of a five-story structure with now an additional 22 foot does not adequately account for the impacts on adjacent properties, including ours. The increased building height and placement of windows directly facing our single-story house result in further substantial permanent loss of privacy.

As we understand CEQA Class 32 is a rule that lets the city approve small, urban "infill" projects without doing a full environmental report as long as the project is in an already-developed area and doesn't cause major environmental impacts. **However** this project is not by any means small **and IT DOES** impact on traffic circulation issues, noise, and public safety. The assumption that most residents rely on public transportation is not supported by actual conditions, as the majority of residents do not use public transit due to safety issues, specially during late hour transit. These are felt to be red flags.

Therefore, the Class 32 special exemption should not apply.

The project does not function as a genuine TOC affordable housing development.

I respectfully request that the City reconsider the applicability of the CEQA exemption, ensure that the construction issues, cumulative impacts indicated hereof, the special circumstances, and environmental impacts are part of the official record, and evaluate whether additional review, mitigation measures, or conditions of approval are necessary to protect the surrounding community.

Thank you.

Edgar and Carmen Grazziani

18+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:

Item 08:
DIR-2023-2337-TOC-HCA-M1-1A

Email Message:

City Planning Commission,

I urge you to oppose the appeal and allow the housing project at 1925 Montrose St. in Echo Park to move forward.

Los Angeles urgently needs more housing, and this project would add 19 new homes, including two for Extremely Low Income households, in a transit-served neighborhood. Delaying or blocking projects like this only worsens our housing crisis.

Please oppose the appeal and support the new housing Echo Park and Los Angeles needs.