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- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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CITY OF LOS ANGELES



CALIFORNIA

**DEL REY
NEIGHBORHOOD
COUNCIL**



Mailing Address:
4325 Glencoe Ave #9365
Marina Del Rey, CA 90292

Email: board@delreync.org
Website: www.delreync.org

January 28, 2026

Kenton Trinh
Los Angeles Department of Planning
E-mail: Kenton.trinh@lacity.org

Re: 5000 Beethoven Street, Los Angeles, CA 90066, Case No. PS-1464

Dear Mr. Trinh:

As requested by the Department of Planning, on January 15, 2026, the Del Rey Neighborhood Council ("DRNC") Land Use and Planning Committee held a public meeting with the owner's representative, Athena Novak, for the proposed development at 5000 Beethoven Street.

This meeting had unusually high attendance, with 18 local residents and representatives for conservation groups expressing deep concern about the owner's possible intentions to ultimately develop a 236-unit residential development on the property. In particular, the following comments and concerns were made:

1. This land is immediately adjacent to the Ballona Wetlands Ecological Reserve and because of its unique location at the confluence of two waterways, creates a dynamic and essential component of the local ecosystem, including for protected large birds of prey. There are few areas like this remaining in Los Angeles.
2. Conservation groups, including the Sierra Club and Ballona Creek Renaissance, stated their interest in having the property purchased for conservation at fair market value. Ms. Novak responded that the owner is willing to engage in formal discussions regarding a land sale and that process will soon be initiated.
3. The CEQA environmental study being relied upon is from 1998, and because of the significant building construction being proposed as well as the highly sensitive nature of the property, a current environmental study is needed.
4. The owner's perceived lack of honesty with the DRNC, the community, as well as the Department of Planning, by (a) at times suggesting that they want to build a 90,000 sq foot industrial building, and (b) building a bridge and then asking Planning to make it a public street, a seemingly innocent request, that is in reality a piecemeal effort at slowly working towards their ultimate goal of building a large residential development.

In response to the foregoing, on January 21, 2026, the DRNC Board of Directors unanimously passed the following motion at a Special Board meeting:

“The DRNC opposes the application for private street access at 5000 Beethoven and instead calls for the following:

- i. the owner to work with the community, the State, and/or conservation groups on a possible sale of the property for conservation purposes at fair market value, and specifically requests that the owner issue a willing seller letter to enable an appraisal process.
- ii. The City to require an updated Mitigated Negative Declaration (MND) since the previous MND was completed on September 9, 1998.”

Per the above motion, we respectfully request that the Department of Planning postpone any determination on the current application until a new environmental study is conducted and a potential sale of the property is fully explored. It should be noted that if the property is sold to conservation groups, vehicle access to the newly constructed bridge will not be needed and will in fact be detrimental to their efforts. Therefore, a decision on the current application should not be presently considered.

Best regards,

Doug Barish
Chair, Land Use and Planning Committee
Del Rey Neighborhood Council

cc:

Ariel Jones, DAA
Traci Park, Los Angeles City Council, District 11
Craig Bullock, Planning Director, CD 11
Matthew Halden, Del Rey Field Deputy, CD 11
Sean Silva, Venice Field Deputy, CD 11
Athena Novak



Case No.: PS-1464 - Demand by Developer Representative for me to rescind my comments re: State of California 30 x 30 eligibility.

1 message

Marcia Hanscom <defendballonawetlands@gmail.com>

To: Planning APC West LA <apcwestla@lacity.org>

Cc: Kenton Trinh <kenton.trinh@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Ravi Sankaran <Ravi.Sankaran@delreync.org>, Sean Silva <sean.silva@lacity.org>, Craig Bullock <craig.bullock@lacity.org>

Case No.: PS-1464 - August 5 2026 hearing of West LA Area Planning Commission meeting

Dear Planning Commissioners, Planning Commission Staff, CD-11 staff and Department of City Planning Staff:

On July 23, 2026 the developer's representative, Athena Novak, wrote me an email message which you can see copied below, wherein, she declines to do so because the comments I made were and are accurate. Here is what I said, and it is delivered that day and what I will say on August 5. A .pdf of that powerpoint presentation is attached to this email message.

"The State of California has this place listed on its 30 x 30 list for possible acquisition for park land."

As you can see, that is very different than what the developer's representative has indicated in her message. She found a website that reprogram (meant to conserve 30% of California's Lands and Waters by 2030.)

"Possible acquisition" which are the words I used - means that the land is eligible for acquisition funding from the State of California, due to the fact that we refer to as "Bird Island" at 5000 Beethoven in the Del Rey neighborhood. Of course, such a public acquisition property is already in CDFW (CA Dept of Fish & Wildlife) ownership (Ballona Wetlands Ecological Reserve), as one of CDFW's letters explains that 5000 Beethoven land is immediately adjacent to the Ballona Wetlands Ecological Reserve.

One of the reasons I mention(ed) this eligibility in my comments is that this same developer's representative, as well as another one who is attending the meeting, have stated several times that the land was "for sale" and if the public wanted to acquire it for a nature park, then the owners would be willing to sell.

We hope this message helps clear things up in case this misunderstanding of the 30 x 30 eligibility situation for Bird Island is brought up at the meeting.

With kind regards ~
Marcia Hanscom
Defend Ballona Wetlands
(310) 877-2634

P.S. The developer's representative opens her email message with: "I hope this email finds you well." - a statement that took me aback, so at the hearing, she pointed her finger at me in an accusatory manner and stated, "We're coming after you."

I've never taken any of the advocacy efforts I've been engaged with personally, and I've always been congenial toward the developer and never like a threat to me, and it is being reported as such. Hopefully, the Commission will set the tone for respectful dialogue and commentary at the hearing.

From: Athena Novak <athenanvk@aol.com>
Date: July 23, 2026 at 2:56:34 PM PDT
To: wetlandact@earthlink.net
Subject: 5000 Beethoven 30 x 30 Conservation

Hello Marcia - I hope this email finds you well. At the WLA PC Hearing you provided that the 5000 Beethoven site is identified as being part of the 30 x 30 site for the conservation area. Please see attached.

As you can see the 5000 Beethoven site is not included in the Conservation Area. It is the Ballona Los Angeles Flood Control Channel and Channel walls.

The site is private property, and the owner has not nor will he nominate his land into the 30 x 30 Conservation program. The program is clear only an open space and or conservation.

May we ask if you and or anyone you know have entered the site into the 30 x 30 program?

At the hearing you provided to the Commissioners that the site was already in the program and earmarked by the State for Conservation.

May we ask if you can rescind your comments that the site is part of and or earmarked for open space and or conservation.

Best,
Athena Novak
AHN & Associates

16350 Ventura Blvd Ste D PMB 116
Encino, CA 91436
W: (818) 906-7449
C: (818) 430-0552
E: Athenanvk@aol.com
Ms. Athena Novak

Time is like a river. You cannot touch the same water twice, because the flow that has passed will never pass again. Enjoy every moment of y

Nominating Private Land into California's 30x30 Program:

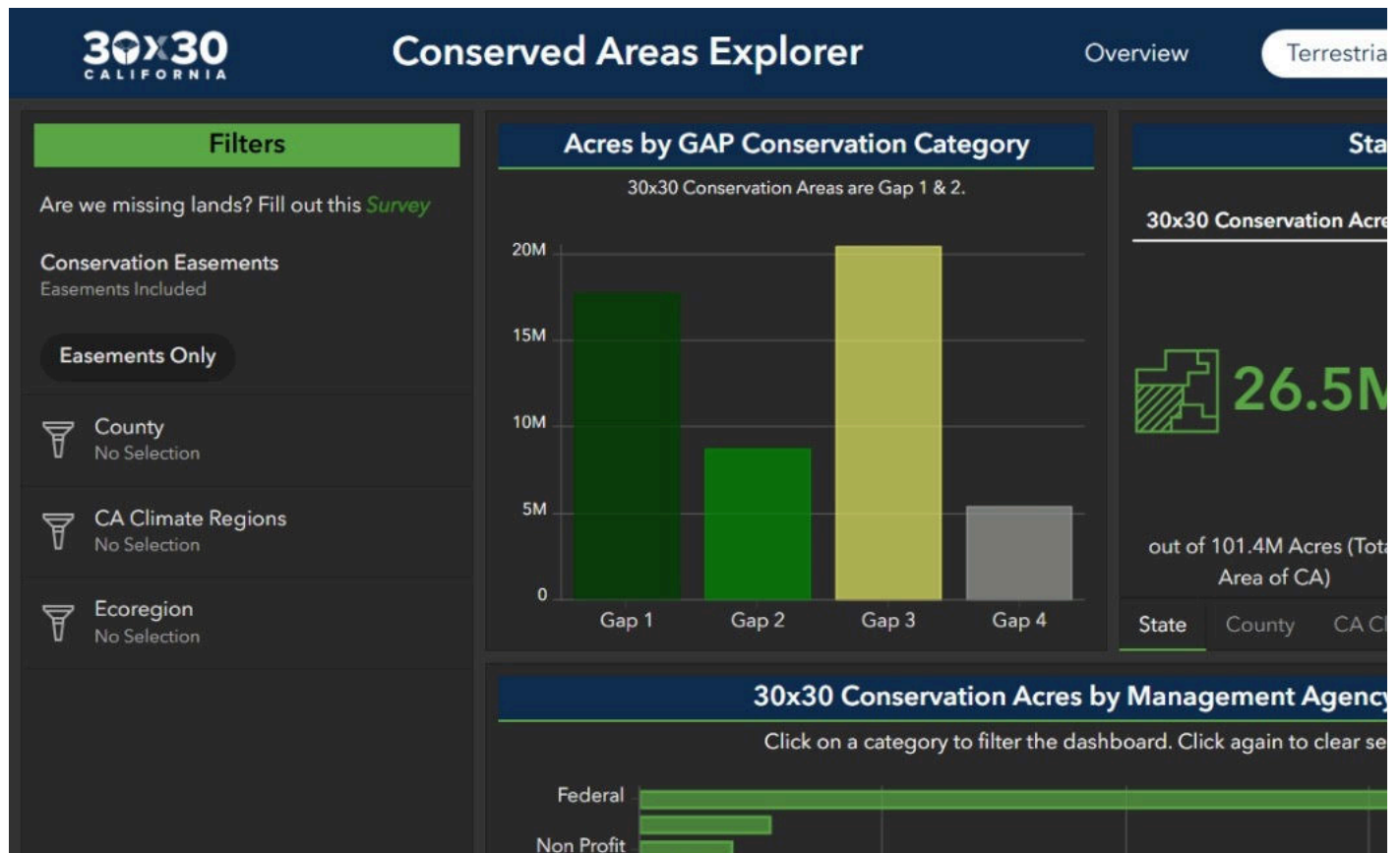
"In California's 30x30 initiative, the process of nominating land — whether private or public — depends on **who owns or manag**

Who can nominate or update land records

- **Landowners or managing agencies** (including private landowners, nonprofits, and government agencies) can update their

Non-owners can still help

- **While the official nomination process is handled by the landowner or managing agency**, non-owners can support the process
 - Confirming that conserved lands are accurately represented in the Conservation Areas Explorer www.californianature.org
 - Participating in public outreach or data surveys to help identify gaps."





The Honorable Traci Park
Councilmember, District 11
City of Los Angeles

September 29, 2023

Sent electronically

Also sent to: Star Parsamyan, Jamie Page, Jeff Khau, Gabriela Medina, Ashley Lozada, *Council District 11 Office*
Noah McCoy, Maritza Przekop, Lisa Webber, *LA City Planning Department*
Eugene Barbeau, *LA City Department of Engineering (DOE)*
John Weight, Osama Younan, Binh Pham, *LA City Dept of Building & Safety*
Krista Kline, Kevin Keller, *LA City Mayor's Office*
Tracy McGee, Laura Muraida *LA County Supervisor Holly Mitchell*
Mark Pestrella, *LA County Public Works Director/LA County Flood CD*
David Castanon, Aaron Allen, *US Army Corps of Engineers*

URGENT COMMUNICATIONS – PUBLIC SAFETY EMERGENCY: re: Bridge over Centinela Creek/5297 S. Beethoven/Del Rey community; bridge to facilitate development of 5000 Beethoven/**Bird Island** REQUEST FOR STOP WORK ORDER & STRUCTURAL ENGINEERING ANALYSIS

Dear Councilmember Park (and all copied here to have an interest in public safety):

Following up on our letter of September 20, 2023, the two of us

322 Culver Blvd., #317 • Playa del Rey, CA 90293

BIRD ISLAND BRIDGE

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undersigned, visited the site on September 26, where no work was being done at the time. However, there was a definitive work site for the bridge construction that is in progress. We inspected the site at approximately 4:00 pm. Our purpose of the visit was to document the extent of the work completed and to check for weaknesses in the concrete wall that we had documented previously before the permit was issued and of which the previous L.A. City Council office was notified.

We are writing once again to request that you direct city staff to place the bridge-building permit on hold due to what we observed. We are requesting your intervention with more urgency than in our previous letter due to what was witnessed – as documented in a two-page summary report by one of us, Robert van de Hoek, an environmental scientist, trained in geology and physical geography sufficient to be alarmed and to know the situation must be reported.

We urge you to stop the construction of a bridge we understand is currently being built at 5297 S. Beethoven Street – designed to span the Centinela Creek flood control channel in the neighborhood of Del Rey in the City of Los Angeles. The purpose of the bridge is to facilitate development of a development project that the community has been opposed to for many years. We – and most people and environmental groups in the region – refer to this site as Bird Island, although the developer refers to it as 5000 Beethoven.

As is stated in the two-page report, as well as shown in photos attached, the vertical wall on the Centinela Creek flood control channel has a one inch offset

BIRD ISLAND BRIDGE

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with 1/4 to 1/2 inch separation from the top of the wall to the bottom of the wall, which is approximately 50-70 ft in distance, revealing a weakness in the vertical wall that must be examined by professional engineers in order to ensure public safety before any further work is allowed to proceed.

Please read the entire two-page summary report, and please take action to make sure this 50-year old infrastructure is protected from further stress from the pile driving. We ask that you request an assessment be completed (perhaps an Environmental Impact Statement; EIS – the federal version of an EIR) as well as an EIR is needed, as many people in the community have requested for building a bridge where none was contemplated when the stream flows of the Centinela Watershed were diverted and where the situation has been described in the attached report.

Thank you for your concern and swift attention to this matter.

With kind regards,

Marcia Hanscom /s/

Marcia Hanscom
(310) 877-2634

Robert Jan van de Hoek /s/

Robert Jan van de Hoek
Environmental Scientist, Hydrologist

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Cc: Del Rey Neighborhood Council/Ravi Sankaran, President; Pooja Bhagat/Land Use

David McNeill, Baldwin Hills Conservancy

Brad Zacuto, Principal, Westside Neighborhood School

Lauri Chryss, Parent, Westside Neighborhood School

Melanie Schlotterbeck, Southern California Region Nature for All – 30 x 30

Walter Lamb, Ballona Wetlands Land Trust

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Summary Report from Robert Jan van de Hoek, Environmental Scientist

Academically trained with two university degrees and professional applied experience as a scientist for US Forest Service and US Dept of Interior - Geology, Geography, Biology, Cultural Resources

Observations from September 26, 2023 – approx. 4-5 pm

The location for this report is in Los Angeles County, California, east of Lincoln Boulevard (Hwy 1) and north of Jefferson Boulevard, at the northern terminus of Beethoven Street at the Centinela Creek flood control channel.

Underlying Beethoven Street is a large buried storm drain channel, with dimensions of approximately 25 feet across and six feet high, with an open area of approximately 150 sq. ft. - used for water drainage during rain events.

This storm drain intersects with the Centinela Creek flood control channel at approximately two to three feet above sea level so that if a rain storm coincides with a high tide there is a potential for some backup of the freshwater in the Beethoven storm drain. The intersection of the Beethoven storm drain and Centinela Creek flood control channel, is in the same location as the pilings being driven into the vertical wall for the bridge.

The vertical wall on the Centinela Creek flood control channel at the above location has a one inch offset with 1/4 to 1/2 inch separation from the top of the wall to the base of the wall, which is approximately 50-70 ft in distance.

Note that the base of the wall is at sea level so that high tides twice daily cover three to five feet of the lower portion of the vertical wall, which has resulted in exfoliation of the cement in several places on the north side of

the Centinela Creek flood control channel, directly opposite Beethoven Street. The bottom (floor) of the Centinela Creek flood control channel is cement-lined, however approximately 100 feet seaward (towards the west) the channel changes to soft-bottom.

Up and down the Centinela Creek channel for at least 50 meters in each direction of Beethoven Street, there is no other offset. The offset and the separation is in the center of the main construction area for the bridge pilings and where the bridge pilings have been driven closest to the wall.

This separation and offset is the result of the pile driving OR the result of geological erosion processes in the unconsolidated sediment. Of course, the separation and offset is possibly a combined result of the two factors mentioned above.

Regardless of which cause, the separation/offset calls for an investigation by engineers and a geologist, as well as a soil scientist. We need to call in experts in waterway safety, including the LA County Public Works/Flood Control & US Army Corps of Engineers.

If the bridge developers state they will seal or buttress the wall, that would be insufficient and merely a "band-aid," because the offset (displacement) informs us that the structure is weakened (not only because of the separation and offset, but the number of decades that have passed since the construction of the channel (circa 1960s/70s = approximately 50 years.)

Also, constant movement of tidal waters and higher localized atmospheric humidity in this area has caused exfoliation in several locations, as mentioned above.

This situation is a serious public safety and hazard situation, and requires an investigation and stop work order for a proper solution that fully addresses public safety and stability of the structure of the Centinela Creek flood control channel.



Planning APC West LA <apcwestla@lacity.org>

Public Safety Concerns - Pilings/Bridge Offsets

1 message

Marcia Hanscom <defendballonawetlands@gmail.com>
To: Planning APC West LA <apcwestla@lacity.org>

Mon, Aug 3, 2026 at 1:52 AM

We submitted this to City authorities three years ago - requesting a structural engineer be retained to observe and review the issues discussed by Robert van de Hoek in the 2 pg summary attached to this letter. Please include this in the package of information for the Commissioners for item #5 on the August 5, 2026 agenda of the West LA Area Planning commission. THANK YOU.

~ Marcia Hanscom
Defend Ballona Wetlands
Appellant

4 attachments



IMG_0833_offset south wall_3.jpg
1604K



IMG_0827 vertical offset at separation_north wall.jpg
985K



Pilings Beethoven bridge 2022.jpg
319K



Bird Island Bridge Emergency #2 Defend Ballona Wetlands.docx.pdf
184K





Transfer to APU

apu.edu/transfer

OUTFRONT

1020



APPLICANT'S RESPONSE TO STAFF RECOMMENDATION REPORT

Case No. APCW-2025-2220-SPPE-CU2-SPPC-CDP | CEQA No. ENV-2025-2222-CE

305 East Rose Avenue and 254 South Hampton Drive, Venice, CA 90291

Submitted for the West Los Angeles Area Planning Commission hearing of August 5, 2026

This document is written in direct response to the Department of City Planning's recommendation report for the August 5, 2026 meeting of the West Los Angeles Area Planning Commission, which recommends denial of a specific plan exception.

The Applicant believes that he has made all of the findings necessary to qualify for a Specific Plan Exception. The Applicant responds below to each of the 5 findings as presented in the recommendation report.

Response to Finding 1.a — Practical Difficulties and Unnecessary Hardship

The Department of City Planning states in their recommendation report:

"The strict application of the regulations of the specific plan to the subject property would NOT result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan."

The Applicant respectfully disagrees. The hardship is a direct and measurable result of the property's regulatory and physical constraints. The hardship, itself, is not at all related to the proposed use:

- The building is a designated historic resource. SurveyLA has identified it as a rare surviving 1900s Venice church. It cannot be demolished and cannot be materially altered.
- The building has no legal use right. The church use lapsed under LAMC 12.23 following a vacancy exceeding one year, which occurred prior to the Applicant purchasing the property. There is no use currently allowed on this site.
- A return to the longstanding church use is not available by right and would generate a larger parking exception, requiring: (1) a conditional use permit for religious assembly in the RD zone; (2) a coastal development permit to establish a "new" church use; and (3) a specific plan exception for zero parking spaces in lieu of 84 spaces (VCZSP: 1,755 SF sanctuary ÷ 21 = 84).
- The building has no parking credit. The nonconforming parking rights that would ordinarily accompany a pre-existing structure lapsed along with the use.
- The building cannot be legally occupied, in any capacity, without both a coastal development permit and a specific plan exception for parking. This finding is completely unrelated to and independent of the Applicant's request for a private club use.
- On-site parking cannot be physically provided without demolishing or materially altering an historic structure.

A property that is a protected historic resource, has no use rights, has no parking credit, and cannot be occupied without a specific plan exception, is the very definition of a hardship, and it is precisely the reason why relief mechanisms like a specific plan exception exist.

The National Trust for Historic Preservation's published guidance on adaptive reuse states:

"Parking requirements and restrictions on mixed-use buildings can stand in the way of adaptive reuse projects."

The Trust's research arm, the Preservation Green Lab, has identified high parking minimums and inflexible parking requirements as specific barriers to the redevelopment of older buildings.

Staff's suggested alternatives to on-site parking do not change this analysis:

- The in-lieu fee, at \$18,000 per space, totals \$1,386,000 for the full 77-space requirement — an astronomical expense that would further burden the Applicant and make utilization of the property financially infeasible.
- Off-site parking within 750 feet is not shown to exist. The Applicant's representative conducted a study of parking within a 750-foot radius and found that all of that parking was either (1) dedicated by permit or covenant to existing uses, or (2) only available for single-user parking permits. Staff's own finding describes the surrounding parking supply as already constrained.

The 77-space figure grossly overstates the project's actual parking demand:

- The specific plan and the Los Angeles municipal code, working together, misclassify parking for a "private club."
- Staff's analysis does not account for micromobility, shared mobility, or the actual behavior of Venice residents.
- The 1-space-per-75-square-foot ratio applied to this project is an artifact of a specific plan that, in the years leading up to its original adoption in 1999, could not have contemplated or properly studied the parking impacts of a combined coworking and social club use concept. The proposed use is more analogous to a modern-day creative office.
- The 1:75 parking ratio is also a consequence of a municipal code that does not refine the term "private club" into sub-categories of definable uses. As a result, the catchall term "private club" inherits its parking requirement from the same term in the VCZSP Section 13.D, where that document uses the term "private club" alongside uses like "dance hall" and "roller rink"—uses which bear no resemblance to the co-working and social club.

Staff treats the LAMC 12.23 use-right lapse as also voiding any nonconforming-structure parking credit. The Applicant requests the Department distinguish between discontinuance of a nonconforming use and the nonconforming status of the structure's physical development standards, including parking, which attach to the building and lot.

Response to Finding 1.b — No Exceptional Circumstances

The Department of City Planning states in their recommendation report:

"There are NO exceptional circumstances or conditions that are applicable to the subject property or to the intended use or development of the subject property that do not generally apply to other properties within the specific plan area."

The Applicant respectfully disagrees. The exceptional circumstance is the same fact pattern established in response to Finding 1.a, and it is not shared by other properties in the specific plan area:

- Staff's own Report states that most commercial buildings in the area retain nonconforming parking rights. This property does not.
- This property lost that ordinary property right for one reason: a vacancy exceeding one year, following denial of a prior variance application to allow an office use in 2014 (ZA-2013-1426-CDP-ZV).
- This property is simultaneously: (1) a designated historic resource that cannot be demolished; (2) without any current use right; and (3) without any parking credit. That combination is not the general condition of property in this specific plan area.

Staff's Report attributes the loss of nonconforming rights to "actions or inaction by the property owner." The Applicant rejects this characterization.

- 305 Rose Avenue, LLC acquired the property in August 2021, more than four years after the last known tenant vacated the property. The vacancy that triggered the loss of use and parking rights under LAMC 12.23 predates the current ownership entirely, and that vacancy was not caused by any action or omission of the Applicant.

Staff's Report also states that "the physical constraint only acts as a barrier because of the specific commercial use the applicant has selected." The Applicant respectfully disagrees with the implication in this statement.

This statement implies the hardship is self-created, in that the Applicant chose a parking-intensive use when a less-burdensome alternative was available. As shown in response to Finding 1.a, the closest alternative use, church, requires more parking (84 spaces) than the private club requested here (77 spaces). A conforming residential use would require demolishing or gutting the historic sanctuary for R-occupancy habitability upgrades, infeasible for financial and preservation reasons. There is no less-burdensome option the Applicant has opted out of.

California's controlling authority on self-created hardship, *Broadway, Laguna etc. Assn. v. Board of Permit Appeals* (1967) 66 Cal.2d 767, confirms that this hardship is not self-imposed: a hardship is self-imposed only if the condition was created by the party now seeking relief. This Applicant did not create any of the hardships from which he is seeking relief.

A property that cannot be demolished, cannot be used as-is, and cannot satisfy current parking standards on its own lot is, by definition, an exceptional circumstance.

Response to Finding 1.c — Preservation of a Substantial Property Right

The Department of City Planning states in their recommendation report:

"The Specific Plan Exception is not necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other properties within the specific plan area in the same zone and vicinity."

The Applicant respectfully disagrees. The substantial property right at issue is not limited to adaptive reuse. It is the right to redevelop the property, period:

- As established in response to Finding 1.a, the property has no legal use right and no parking credit. Absent this exception, the property cannot lawfully be put to any use — adaptive reuse, new construction, or otherwise.
- Other properties in the specific plan area retain the ability to redevelop or change use without triggering a 77-space parking requirement they cannot physically satisfy, because they generally retain nonconforming parking rights this property has lost, and generally are not improved with a historic resource that cannot be demolished.
- Denying the exception does not preserve some other viable path for this property. It leaves the property in its current state: a vacant, unusable structure that can be neither occupied nor demolished.
- LAMC 12.24 W makes only a small number of conditional uses available to an assembly-type building in the RD1.5-1 zone: church (W.9), private club (W.35), and fraternity house (W.21). Private club is one of the very few uses the Code allows here, and the closest alternative — a return to church use — requires an even larger parking exception, as shown in response to Finding 1.a.
- Glendale and Long Beach both exempt historic-resource changes of use from additional parking, with no sunset clause for parking rights.

The right to redevelop property is a substantial property right by definition. Denying this exception denies the only path to any lawful use of the property.

Response to Finding 1.d — Detriment to Public Welfare

The Department of City Planning states in their recommendation report:

"The granting of the exception WILL be detrimental to the public welfare or injurious to property or improvements adjacent to or in the vicinity of the subject property."

The Applicant respectfully disagrees. Staff's own record does not support this finding:

- Staff's Report states the Applicant's Parking Demand Management Analysis calculates a base parking demand of 7 to 10 vehicles at peak hours — a far more accurate reflection of actual demand than the 77-space figure.
- A Fehr & Peers study prepared for the Department found 18% of on-street and up to 39% of off-street parking in the Venice Coastal Zone unused on most days, and found Venice already has among the highest parking requirements of any coastal Southern California city.

Los Angeles's parking standards have not been updated to reflect real-world travel patterns, in the same way the Municipal Code's use categories have not been updated to reflect the co-working/social-club use proposed here (Finding 1.a). In both cases, the codes were written for conditions that no longer describe the neighborhood or the use to which they are now applied.

- Council District 11, which includes Venice, had the greatest concentration of shared micromobility devices of any council district in the City when LADOT tracked the rollout of its dockless scooter and bike permit program — approximately 7,700 of roughly 20,000 devices then deployed citywide.

- California's Healthy Places Index documents that the project's census tract ranks in the 92.9th percentile statewide for active commuting. The Section 13.D parking ratio, set in 1999, does not incorporate this data and assumes a level of automobile dependency this neighborhood does not exhibit.
- The Lighthouse Venice creative campus, located at 1601 S Main Street in the historic Venice post office building, is 23,690 SF and provides 34 parking spaces. This comparable use would show a theoretical 282-space "deficiency" (as compared to the Applicant's purported 77-space deficiency) if parking requirements for the Lighthouse were determined using the same "private club" ratio applied here. Yet there have been no documented issues related to parking at 1601 S Main Street. This is evidence that viewing a specific plan parking deficiency literally is not a reliable way to capture parking impacts because it does not account for the factors above, nor does it account for the behavior of individuals when traveling locally.

Conditions of Approval already recommended by Staff, including no amplified sound, no dancing, no events, restricted hours, interior sound walls, and acoustic windows, address neighborhood impact independent of the parking determination.

Response to Finding 1.e — Consistency with the Specific Plan and General Plan

The Department of City Planning states in their recommendation report:

"The granting of the exception is NOT consistent with the principles, intent and goals of the Specific Plan and any applicable element of the General Plan."

The Applicant respectfully disagrees. This finding is inconsistent with Staff's own recommended Finding 2.a, which states that Venice Land Use Plan Policy I.F.2 encourages adaptive reuse of historic structures and that this project "will extend the useful life of this historic structure and activate the area." Finding 1.e cannot simultaneously hold that the parking relief necessary to make that same adaptive reuse possible is inconsistent with the General Plan.

Local and statewide policy both prioritize historic preservation over parking requirements:

- The City's General Plan Framework Element (effective February 6, 2025) states that adaptive reuse of historic buildings is responsive to the historic and cultural legacy of the areas in which they are located.
- The Adaptive Reuse Ordinance's legislative purpose is to implement the General Plan by facilitating conversion of older, economically distressed, or historically significant buildings, and to reduce vacant space.
- The Venice Land Use Plan, Policy I.F.2, encourages adaptive reuse and renovation of historic structures identified in the LUP.
- The California State Historical Building Code (Health & Safety Code § 18951) exists to facilitate the rehabilitation, restoration, or change of use of qualified historical buildings; Section 18956 provides that the SHBC governs other statutes and regulations as they apply to such buildings.
- None of the state or local authorities above condition their preservation priority on the availability of on-site parking.

Industry estimates place the number of churches closing nationally at 6,000 to 10,000 per year. The following are examples of businesses which operate, or have operated, inside former church buildings:

- The Ruby Street (Garvanza, Los Angeles). A former church built during the 1930s Arts and Crafts movement was renovated into a coworking facility. The facility hosts daily coworking use together with workshops, screenings, exhibitions, and an artist-in-residency program.
- Grace (Portland, Maine). An 1856 Gothic Revival Methodist church, vacant from 2005 to 2009 and listed on the National Register of Historic Places, was converted to restaurant and event use in 2009. In 2019, the operator discontinued regular restaurant service and converted the space to an events-only venue, hosting approximately 50 weddings per year in addition to corporate events.
- Church Brew Works (Pittsburgh, Pennsylvania). A former church deconsecrated in 1993 was converted into a brewery and restaurant, with the brewing equipment installed in the former apse.
- Second Nazareth Missionary Church (Point Breeze, Philadelphia, Pennsylvania). An 1887 former Baptist church is being converted into a brewery and restaurant, retaining the building's function as a communal gathering space.
- Multiple closed churches (Cincinnati, Ohio). Closed churches in Cincinnati have been converted into a brewery, a restaurant, a retail store, and an event center.

Conclusion

The Applicant requests that the Commission decline to adopt staff's recommended Finding 1 and approve the Specific Plan Exception for zero on-site parking spaces. The Applicant does not seek any change to the recommended Conditional Use, Project Permit Compliance Review, or Coastal Development Permit approvals, and accepts the recommended Conditions of Approval independent of the Commission's determination on this issue.

REFERENCED MATERIALS

Department of City Planning — Recommendation Report, Case No. APCW-2025-2220-SPPE-CU2-SPPC-CDP (Aug. 5, 2026 WLA APC hearing) — <https://planning.lacity.gov/about/commissions-boards-hearings>

Broadway, Laguna etc. Assn. v. Board of Permit Appeals (1967) 66 Cal.2d 767 — <https://law.justia.com/cases/california/supreme-court/2d/66/767.html>

LAMC 12.24 W — Conditional Uses (church, private club, fraternity house in residential zones) — https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-5183

Venice Coastal Zone Specific Plan, Ordinance No. 175,693, Section 13.D — Parking Requirement Table — https://planning.lacity.gov/odocument/b76ef566-6a24-4603-a5cc-e040af8646c4/Venice_Coastal_Zone_Specific_Plan.pdf

City of Los Angeles — Summary of Parking Regulations (general citywide office ratio) — <https://www.hhwnc.org/wp-content/uploads/2016/03/Parking-Summary-of-Parking-Regulations.pdf>

Los Angeles General Plan Framework Element (adopted 2023, effective Feb. 6, 2025) — https://planning.lacity.gov/odocument/766f08ec-ae67-4086-b102-6c4ed55fe387/Appendix_A_Framework_Element.pdf

California Health & Safety Code §§ 18950–18961 — State Historical Building Code — https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=18950

California Healthy Places Index (HPI) — Census Tract 2733.00, LA County (FIPS 06037273300), Active Commuting (92.9th pctl.) — <https://map.healthyplacesindex.org>

Fehr & Peers / LA City Planning — Parking Utilization and Transportation Management Strategies Report (Venice Coastal Zone) — https://planning.lacity.gov/odocument/23ddb5-632b-4b58-a3d0-29846fcc3c84/Fehr_Peers_Parking_Utilization_and_Transpor.pdf

LA Downtown News — "State of the Scooters" (CD11 highest device concentration citywide) — https://www.ladowntownnews.com/news/state-of-the-scooters/article_1522609e-b57e-11e9-998c-afcb23430f2c.html

PropertyShark — 1601 Main St, Venice, CA (parking count) — <https://www.propertyshark.com/cre/commercial-property/us/ca/venice/1601-main-st/>

CommercialSearch.com — 1601 Main St, Venice, CA (parking spaces) — <https://www.commercialsearch.com/commercial-property/us/ca/venice/1601-main-st/>

Los Angeles Business Journal — "Post Office Morphed Into Creative Office Site" (The Lighthouse) — <https://labusinessjournal.com/real-estate/post-office-morphed-into-creative-office-site/>

Los Angeles Conservancy — "Venice Post Office" (historic eligibility) — <https://www.laconservancy.org/learn/historic-places/venice-post-office/>

National Trust for Historic Preservation — "Making the Case for Adaptive Reuse" — <https://savingplaces.org/stories/making-the-case-for-adaptive-reuse>

Preservation Green Lab / Model Adaptive Reuse Ordinance — <https://germanvillage.com/model-adaptive-reuse-ordinance/>

The Spaces — "This Former LA Church Is Now a Worshipful New Coworking Space" (The Ruby Street) — <https://thespaces.com/this-former-la-church-is-now-a-worshipful-new-coworking-space/>

Portland Press Herald — "Grace, the Portland Restaurant in a Remodeled 1856 Church" — <https://www.pressherald.com/2018/11/20/grace-the-striking-portland-restaurant-in-a-remodeled-1856-church-will-close-at-the-end-of-the-year/>

Aplos Group — "Adaptive Reuse: Churches" (national closure estimate; Grace, Portland) — <https://aplogroup.com/adaptive-reuse-churches-2-2/>

Stillunfold — "Church Brew Works: Old Church Revamped Into Restaurant" (Pittsburgh) — <https://stillunfold.com/travel/church-brew-works-old-church-revamped-into-restaurant>

The Philadelphia Inquirer — "A historic Point Breeze church is being transformed into a brewery" — <https://www.inquirer.com/real-estate/commercial/point-breeze-church-brewery-18th-and-tasker-20260514.html>

Hamilton County, Ohio — "What To Do With Empty Churches?" (Cincinnati examples) — https://www.hamiltoncountyohio.gov/news_detail_T24_R149.php



PUBLIC COMMENT: Adjacent Property Owner Opposition - Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE (305 Rose Ave)

2 messages

Craig Riberio <carsmca@aol.com>
To: Planning APC West LA <apcwestla@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>

Sat, Aug 1, 2026 at 5:46 PM

**Dear Honorable
West Los Angeles Area Planning Commissioners,**

I am writing as a local property owner located on 3rd Avenue. My property directly connects to and shares the continuous alleyway system that services [305 Rose Ave](#). I want to state my unequivocal opposition to the requested Coastal Development Permit and Conditional Use Permit for the proposed private club. I strongly urge the Commission to uphold the Planning Department's staff recommendation to deny the parking exception, and to reject the project entirely.

My objections are grounded in direct, historical experience with commercial operations at this exact site and the specific zoning constraints of our alley:

1 Proven History of Alleyway Gridlock: When the "Full Circle" private club operated here, patrons, rideshares, and delivery trucks routinely backed up through the alley network all the way to 3rd Avenue, blocking my garage and trapping my vehicle. Introducing a high-volume venue with a 79-space parking deficit ensures permanent gridlock for everyone hooked into this service lane.

2 The 92-Bicycle Rack Deficit: The developer's claim that they can replace car spaces with bicycle parking is a spatial impossibility. Fitting the legally mandated 92 bicycle racks onto this tight church lot is physically unfeasible, proving their backup parking plan is an illusion.

3 Preempting the Historic Monument Loophole: The applicant must not be allowed to use a Cultural-Historic Monument designation as a zoning loophole to automatically waive their parking requirements.

4 Mandatory Alleyway Protections: If the Commission considers an approval, it must write strict, binding operational conditions directly into the project's laws: a total ban on rideshare operations in the alley, strict daylight hours for trash/kitchen deliveries, and a ban on club patrons smoking or gathering in the service lane.

Sincerely,
Craig Riberio
253 3rd ave
Venice ca 90291
310-722-0773
Sent from my iPhone

Craig Riberio <carsmca@aol.com>
To: Planning APC West LA <apcwestla@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Sean Silva <sean.silva@lacity.org>, Traci Park <councilmember.park@lacity.org>, Traci Park <traciparkforla@gmail.com>

Sat, Aug 1, 2026 at 5:59 PM

Sent from my iPhone

On Aug 1, 2026, at 5:46 PM, Craig Riberio <carsmca@aol.com> wrote:

[Quoted text hidden]



305 Rose Ave Opposition many many reasons

1 message

Lori Cozen-Geller <lori@loricozengeller.com>

Fri, Jul 31, 2026 at 9:33 PM

To: Planning APC West LA <apcwestla@lacity.org>, konstantin.hatcher@lacity.org

Cc: Phil Brock <commissionerbrock@gmail.com>, Traci Park <councilmember.park@lacity.org>, Traci Park <traciparkforla@gmail.com>, Sean Silva <sean.silva@lacity.org>, Jeff Khau <jeff.khau@lacity.org>

Dear Commissioners and All Interested Parties,

For those who may not know me, my name is Lori Geller and together with my husband Steven Geller we own the 5 unit apartment building at 252 Hampton Drive. Our property sits 15 feet away from 305 Rose Ave/ 259 Hampton Dr. There is a slim 15 ally that separates the Church building which is built on the property line and our tenants bedrooms.

We have owned this property since 2007 and from 2007 - 2011 we lived in our building and along with our tenants, we experienced countless sleepless nights due to the extreme noise and ruckus caused by the occupants of 305 Rose Ave. People were constantly loitering in the ally and on the street in front of our building until all hours of the night. Cars were flipping u turns in the ally, speeding, blocking our parking lot and honking throughout the night.

In 2014, the city rejected the owners request to turn the Church into a work space and now the current owner wants to not only turn it into a workspace but also a social club?? The request was rejected then and it needs to be rejected now. This is a residential neighborhood and our tenants deserve to live in a peaceful and quiet environment (they all work from home).

I am expecting the developers to provide plans for a last minute off parking lease however leases are not secured, situations change, parking lot owners sell, etc. This situation would not be staple. In addition there is no guarantee that social club goers would actually use the lots, instead they will use residential parking spaces.

Another huge problem stems from the fact that the owners have not secured a tenant. Common sense tells me that although the owners pulled the CUB for alcohol, no tenant is going to rent it as a social club without liquor which means that the future tenant will attempt to pull a CUB for liquor. When our attorney, Alan Block, asked the owner's representative if they would have their future tenant sign a document forbidding them to try to get a liquor license, the representation flatly said, " NO". Adding in the possibility to have liquor served would be horrible. Does no liquor license mean that guests are not allowed to bring in their own liquor? And what is the number of guests that a member can bring in? This is a PRIVATE club and the general community of Venice has nothing to gain from this project. There are so many questions that do not have answers.

I personally walked the neighborhood and I secured 100 signatures for stakeholders/business owners on Rose Ave who vehemently opposed the project for fear of losing street parking for their customers. I walked as far up Rose to 7th Street and even that far east, business owners couldn't sign my petition fast enough.

Sound permitting form the church building is another huge concern as soundproofing the building will not protect the neighbors for loud noise caused by an over intensified use of the property duet the church's close proximity to apartment buildings.

My husband and I along with other stakeholders want the property to be occupied however a social club/co-working space just doesn't seem right.

Please respect us, the neighbors, and completely reject this project.
We thank you with enormous gratitude.

Many thanks,
Lori Cozen-Geller
252 Hampton Drive
(310) 922-2140
Venice, California
lori@loricozengeller.com
www.loricozengeller.com



PUBLIC COMMENT - Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE (305 Rose Ave) - UPHOLD STAFF DENIAL Formal Opposition to the Proposed Private Club, Co-Working Space, and Extended Hours (CUP/CDP)

1 message

rick swinger <rickswinger@yahoo.com>

Thu, Jul 30, 2026 at 8:00 AM

To: Planning APC West LA <apcwestla@lacity.org>

Cc: Sienna Kuo <sienna.kuo@lacity.org>, Traci Park <councilmember.park@lacity.org>, Sean Silva <sean.silva@lacity.org>, Jeff Khau <jeff.khau@lacity.org>, Lori Cozen-Geller Geller <lori@loricozengeller.com>, Steve Geller <steve@stevegellerhomes.com>, Craig Ribeiro <carsmca@aol.com>, Phil Brock <commissionerbrock@gmail.com>

Date: July 30, 2026

To: The Honorable Members of the Planning Commission

From: Rick Swinger

Property/Project Reference: 305 Rose Ave

Case Number: 305 Rose Ave (Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE).

Dear Honorable Commissioners,

I am writing to submit my formal opposition to the requested Conditional Use Permit (CUP) and Coastal Development Permit (CDP) under **Case Number:** 305 Rose Ave (Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE). for the proposed private club and co-working space at the subject property. While I strongly agree with and urge you to uphold the Staff Report's recommendation to **deny the parking exception**, I respectfully urge the Commission to go a step further and **deny the project in its entirety**.

Allowing this commercial use on a severely constrained lot will inflict substantial, irreversible adverse impacts on our immediate residential neighborhood.

My opposition is grounded in three critical pillars:

1. The Staff Recommendation to Deny the Parking Exception Points to a Fatal Project Flaw

The Planning Department's recommendation to deny the parking variance or exception for 305 Rose Ave (Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE) is the correct decision. Parking in this coastal/residential zone is already at a breaking point. A private club and co-working space operating with extended hours will generate a high-density, high-turnover parking demand that this lot simply cannot accommodate. Without an approved parking exception, this project is fundamentally unviable and must not move forward.

2. Preempting "Paper Fixes" (Unstable Off-Site Parking Leases)

I anticipate the applicant may attempt to bypass the parking denial at the eleventh hour by presenting a private, off-site parking lease agreement. I strongly caution the Commission against accepting such an arrangement.

- **Lack of Permanence:** Private commercial leases are easily broken, modified, or terminated, leaving the neighborhood to absorb the overflow when the agreement falls through.
- **Enforcement Failure:** The City lacks the daily resources to monitor whether club patrons are actually using an off-site lot or simply parking on our residential streets.

- **Compounded Congestion:** Forcing patrons to park off-site and walk increases pedestrian-vehicle conflicts and nighttime noise disruptions late into the evening.

3. Irreparable Neighborhood Impacts and the 2014 Precedent

The operational aspects of this project—specifically the combination of a private club, co-working space, and extended hours—are entirely incompatible with the surrounding residential character.

- **Historical Precedent:** This is not a new issue. In 2014, the Zoning Administrator recognized the inherent limitations of this specific property and properly denied an application for a far less intensive office use. The constraints that justified a denial in 2014 have only intensified today.
- **Nuisance and Noise:** A private club operating into the late-night hours will inevitably bring commercial ride-share traffic (Uber/Lyft), slamming doors, loud conversations, and ambient light pollution directly into a quiet residential zone where families sleep.

Conclusion

The Planning Department has correctly identified that the parking exception cannot be justified. Because the parking issue cannot be safely or permanently resolved, and because the intense commercial use will destroy the peace and safety of this neighborhood, I respectfully request that the Planning Commission:

1. **Uphold** the Staff recommendation to **deny** the parking exception for **Case Number:** (Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE)
2. **Deny** the requested CUP and CDP for the private club, co-working space, and extended hours.

Thank you for your time, consideration, and continued dedication to protecting the integrity of our residential communities.

Sincerely,

Rick Swinger

307 Rose Ave

Venice

424-384-7995



THIRD EVIDENCE SUBMITTAL: Technical Amendment & Demand for Total Denial - Case No. APCW-2025-2220 Case No. APCW-2025-2220-CDP-SPPE-SPPC-CUB-CU2 / ENV-2025-2222-CE (305 Rose Ave)

1 message

rick swinger <rickswinger@yahoo.com>

Mon, Aug 3, 2026 at 8:00 AM

To: apcwestla@lacity.org

Cc: Traci Park <councilmember.park@lacity.org>, Sean Silva <sean.silva@lacity.org>, Lori Cozen-Geller Geller <lori@loricozengeller.com>, Craig Ribeiro <carsmca@aol.com>, Phil Brock <commissionerbrock@gmail.com>, sharon <sharon_cruz20@yahoo.com>, Sienna Kuo <sienna.kuo@lacity.org>

Dear Honorable West Los Angeles Area Planning Commissioners,

I am writing to submit my formal opposition to the [305 Rose Ave private](#) club project. I strongly urge the Commission to uphold the Planning Department Staff Report's recommendation to **deny the parking exception**, and to **deny the project and all requested entitlements in their entirety**.

To protect the official record, the city must also preemptively block the applicant's eleventh-hour attempts to bypass this denial through procedural loopholes:

- 1. Reject the Cultural-Historic Loophole:** We request that the Commission explicitly deny any backdoor attempts by the applicant to seek a Cultural-Historic Monument designation for the 1905 church structure solely to trigger a change-of-use parking waiver. Historical preservation must not be weaponized to inflict an unmitigated 79-space parking deficit on our residential streets.
- 2. Expose the 92-Bicycle Rack Illusion:** The applicant's proposal to replace 23 required vehicular spaces with bicycle parking must be rejected. Under city law, a 30% reduction requires the physical installation of **92 short-term and long-term bicycle racks**. The constrained 5,759-square-foot church parcel physically lacks the spatial footprint to accommodate this infrastructure.
- 3. Impose Strict Operational Alley Conditions:** Should the Commission override the staff recommendation and approve the club, we demand the following binding, enforceable Conditions of Approval be written into the Covenant to protect the shared alleyway:
 - A total ban on all commercial rideshare (Uber/Lyft) pickups and drop-offs inside the alleyway.
 - Strict, daylight-only hour restrictions for kitchen commercial deliveries and trash collection.
 - A complete ban on club patrons or staff congregating, talking, or smoking in the alleyway at any hour.

Sincerely,
Rick Swinger
307 Rose Ave
Venice
424-384-7995

DAY OF HEARING SUBMISSIONS