

Communication from Public

Name: Dan Gaia
Date Submitted: 10/31/2021 02:16 AM
Council File No: 21-0829-S1

Comments for Public Posting: Re: Council File No. 21-0829-S1 Dear Members of the City Council: I hope you saw the news this week that Sonya Reese Greenland and Evan Hines have come out against the Reese Davidson Community on the Venice Canals, including the Gregory Hines Community Art Center. See:
https://www.westsidecurrent.com/news/reese-family-demands-name-be-removed-from-controversial-vche-project-on-venice-canals/article_248dd98e-36d0-11ec-a05e-6ffa4f17a762.html
https://www.westsidecurrent.com/venice/gregory-hines-son-speaks-out-against-fathers-name-associated-with-controversial-vche-project/article_7b4cb400-3786-11ec-ab71-af6ed9feb5b5.html Ms. Reese Greenland sent a cease and desist letter to the developers stating that her grandfather—Venice legend Arthur L. Reese—would want the project “stopped immediately” and demanding that the Reese name be removed from the project. She also states that the project is “the opposite of social justice” because it reduces beach access for communities of color by replacing existing surface lot parking with expensive, mechanical lift parking 500 feet further from the beach and freezing substandard streets and sidewalks in place forever. A copy of the letter is available here: (<https://bit.ly/2ZzRwrG>) Mr. Hines, for his part, says it is wrong to put such a massive project so close to the beach and that his father—legendary entertainer Gregory Hines—“would not be for this given what the effect on the community is going to be.” “I don’t think it’s right,” he said, “and Greg would not have thought this was right either.” I stand with Ms. Reese Greenland and Mr. Hines in opposing this project. Further I understand that the project will needless destroy 4 existing units of affordable housing - displacing 4 Venice families - and that the developers are not conducting any environmental review even though the project is in a FEMA flood zone. Affordable housing is important, but so is access to California’s most storied and diverse beach. The Reese Davidson Community does not strike the right balance. Please vote no. Thank you

Communication from Public

Name: emil

Date Submitted: 10/31/2021 01:28 PM

Council File No: 21-0829-S1

Comments for Public Posting: This meeting has had no public outreach posted on the perimeter of said development, violating the Brown Act, and should be rescheduled. DO NOT APPROVE THIS PROJECT, VENICE IS ALREADY A CONTAINMENT ZONE. No one in Venice supports this project unless they're financially or personally involved. It is being pushed through without most residents even knowing, and this after 5+ years. The VNC, VNC LUPC, voted unanimously to reject this project. This project is taking away open space forever in a city that is deficient in open space. The current site is a parking lot that is not underutilized as has been mistakenly presented as such to the city Furthermore, the requests by the developers do not meet current local and coastal requirements, violating the Venice Specific Plan, dual coastal zone, historical zone, etc. And asking to create a whole new sub area to make these exemptions mute, as well as all the unheard of variances being adopted by the city, the parking, the sidewalks, the height, the density, robotic parking, reinforces this dubiously. What will happen to Venice Blvd north and south with all these huge trucks removing tens of thousands of cubic feet of dirt and bringing in millions of pounds of construction materials, it will be torn up and the developers won't be required to pay to for what they destroyed. I have yet to hear about staging during construction. Where will the 100s of workers park, where will building materials be stored, my guess is the farmers market lot to the east will be used, without any notice to the community, taking away even more parking and impacting the farmers market. And what about LA's mobility plan? No bike lane to the gateway to Venice Beach now? As per application, 420 people will live at this location, where their residents and guest park with only 61 parking spaces allotted. On the street, greatly impacting surrounding neighborhoods. What about the noise generated by robotic parking and the endless maintenance and breakdowns causing even fewer parking spaces and less access to the beach. WE NEED a CEQA review. High water table report with massive de watering complications, in the event of a flood, developers state water will go into canals, where is the engineering, or report to mitigated pending disaster? And that in Tsunami zone and in a historic district. The Parking Structures are not CEQA exempt. When tourists visit Venice Beach and park using robotic

structures, there is no drop off area. They will stop outside the structure, get out of vehicle, remove coolers, umbrellas, toys, bikes, surf boards, the children, etc., then pull into the bay to actually park. This will take a massive amount of time, causing endless traffic jams. Upon departure, the same logjam will continue, resulting in further delays. Having to wait an hour to be able to retrieve your vehicle seems very impractical, too.

Corruption abounds as another Venice project was being challenged in court. A San Francisco area state politician drafted legislation removing CEQA requirements on homeless shelters and affordable housing in LA County only, which the governor signed into law, to thwart a lawsuit that VCHC and PATH were losing. How can a northern California politician pass a state law that only affects LA? The understanding is that this is being challenged in court and this project should be put on hold until the courts deem this valid. The process of the city approving this project has been shockingly one sided. The staff reports ignore the concerns of the neighborhood or simply dismiss them, the reports seem to be written by Becky Dennison praising this project no matter the impact to the community, the 10 million visitors a year, or the cost, which my estimate will exceed 100 million dollars, not including the value of the land. Removing the locally loved Linnie Canal park in the Canals and designating it exclusively to that project because its lack of plans for any open public space adds to the one-sidedness of this process. It's just plain wrong. I have attended all meetings for this project and witnessed commissioners turn off cameras during public comments, not keeping a quorum, violating the brown act. I have seen unanimous votes in favor of the project and all variances from people who live far away and won't be impacted by this project. The developers have no experience with projects of this magnitude either building such a massive project or managing one of this size. The only ones who truly want this project approved are the developers and its enablers. The developers stand to gain \$7M in fees. With prices reaching north of a million dollars per 450 square feet per unit, it is almost criminal to allow taxpayers money to fund this disastrous and unwanted project. There are more economical ways to solve homelessness. If you have ANY conscience and moral, you know that this project is severely flawed and must not be approved.

Communication from Public

Name:

Date Submitted: 10/31/2021 09:04 AM

Council File No: 21-0829-S1

Comments for Public Posting: Re: STRONG RECOMMENDATION FOR DENIAL OF THE PROJECT This project violates the conditions and pre-requisites of the site approval, violates the law, and violates the Public Trust. THIS PROJECT MUST BE DENIED. We strongly encourage you to oppose this project on the Venice median, which would entail a zone change from what is currently Open Space to commercial zoning via a General Plan Venice Community Plan amendment as well as unprecedented, extraordinary and unacceptable amendments to the Venice Coastal Zone Specific Plan (VCZSP) and the certified Venice Local Coastal Program Land Use Plan (LUP). The Venice median project is to be located on what is currently Open Space in the Dual Permit Jurisdiction Coastal Zone, just one block from the beach and the center of the Venice Boardwalk, and literally on the historic Venice Canals. The location is defined as APN 4238-024-900 to 4238-024-911, LADOT Lot # 731, between North and South Venice Blvd and Dell and Pacific, which is 43 contiguous lots and approximately 3 acres. The Venice community—including the beach, the Boardwalk, the Venice Canals—is one of the most popular visitor destinations in California, with 16 million people visiting annually (Venice Chamber of Commerce website, 2017), and thus the land use and character of the Venice community are matters of statewide significance. The Venice median project would have an unacceptable and very significant adverse impact on this residential area and one of the most heavily visited tourist locations in the California Coastal Zone. The Venice median is a significant area of Venice's Open Space, and once our precious and limited Open Space is converted to another zoning classification for purposes of new construction, it's gone forever. There are many other locations that must be considered before completely wiping out a finite resource such as Open Space near the beach, at one of the most heavily visited tourist locations in California. I. Misrepresentation of the Site—Open Space and Visitor Serving parking is NOT Underutilized City Property: When the “affordable housing opportunity sites” for HHH funded permanent supportive housing projects were selected by the City, “underutilized City properties” were required to be used. Open Space is not underutilized property. Visitor-serving parking is a very important use and a priority use in the Coastal Zone.

However, the decision makers were not informed of this information!! Rather, the property was described to the City Council as: Venice Dell Pacific Site (LADOT Lot #731) 125 E. Venice Blvd., 4238-024-900 to -911 Located in Council District 11 Property is zoned OS-1SL-O Parcel size is approximately 122.171 s.f. [note: use of a period rather than a comma possibly could be purposeful, to confuse or mislead as to the size of the site] Site Condition: The site includes two parking lots that are being operated by the LADOT. There is a high water table at the site that may present challenges for construction. Project Assumptions: This is a large site that can potentially accommodate more than one project. Proposed Development Strategies do not need to include the entire site. All Development strategies that do utilize the entire site must assume replacement public parking at least a 1:1 ratio. Innovative solutions for parking management and capacity are encouraged. Developments must comply with the Venice Specific Plan. A Coastal Development Permit from the City of Los Angeles will be required, and approval from the California Coastal Commission will also be required. In addition, the decision makers were provided these two photos, which do not clearly show the adjacent Venice Canals or the proximity to the ocean/beach and Visitor-serving center of Venice. Also, the photos seem to represent the area as degraded, unimportant and underutilized, all of which it is not. Significant pertinent, required information was NOT provided to the decision makers (City Council): Nothing was mentioned about the property being in the Coastal Zone nor was it mentioned that the property is located in the Dual Coastal Zone, an area even more protected than the Coastal Zone. Nothing was mentioned about the project site being Open Space, except for the zone reference (OS-1SL-O), which might not have been clear to some or even noticed. It certainly was not mentioned that the project would require General Plan Venice Community Plan, VCZSP, and LUP amendments to change Open Space to Community Commercial zoning and thus that Spot Zoning was required. Nothing was mentioned about the project also including retail uses and a restaurant. Nothing was mentioned about the project being not only adjacent to the world-famous historic Venice Canals but that it would be built on/over the Grand Canal, thus irrevocably modifying this protected Historic-Cultural Monument. Continued in attached letter.

From: Robin Rudisill wildrudi@mac.com
Subject: DENY: CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR-PHP
Date: May 16, 2021 at 12:21 AM



To: Planning CPC CPC@lacity.org, cecilia.lamas@lacity.org, Ira Brown ira.brown@lacity.org
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**CPC Hearing Thursday May 27, 2021
Regular Submission (due May 17, 2021)**

**CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR-PHP
VTT-82288**

ENV-2018-6667-SE

**2102 - 2120 S. Pacific Ave, 116 - 302 E. North Venice Blvd, 2106 - 2116 S. Canal St, and 319
E. South Venice Blvd
(Venice median project)**

To: City Planning Commissioners

**From: 1Venice
Brian Averill
Alex Neiman
Alix Gucovsky
Robin Rudisill
Erica Moore
Alley Bean
Jim Robb
Jason Sugars**

Re: STRONG RECOMMENDATION FOR DENIAL OF THE PROJECT

This project violates the conditions and pre-requisites of the site approval, violates the law, and violates the Public Trust. THIS PROJECT MUST BE DENIED.

We strongly encourage you to oppose this project on the Venice median, which would entail a zone change from what is currently Open Space to commercial zoning via a General Plan Venice Community Plan amendment as well as unprecedented, extraordinary, and unacceptable amendments to the Venice Coastal Zone Specific Plan (VCZSP) and the certified Venice Local Coastal Program Land Use Plan (LUP).

The Venice median project is to be located on what is currently Open Space in the Dual

The Venice median project is to be located on what is currently Open Space in the Beach Permit Jurisdiction Coastal Zone, just one block from the beach and the center of the Venice Boardwalk, and literally on the historic Venice Canals. The location is defined as APN 4238-024-900 to 4238-024-911, LADOT Lot # 731, between North and South Venice Blvd and Dell and Pacific, which is 43 contiguous lots and approximately 3 acres.

The Venice community – including the beach, the Boardwalk, the Venice Canals – is one of the most popular visitor destinations in California, with 16 million people visiting annually (Venice Chamber of Commerce website, 2017), and thus the land use and character of the Venice community are matters of statewide significance. **The Venice median project would have an unacceptable and very significant adverse impact on this residential area and one of the most heavily visited tourist locations in the California Coastal Zone.**

The Venice median is a significant area of Venice's Open Space, and once our precious and limited Open Space is converted to another zoning classification for purposes of new construction, it's gone forever. There are many other locations that must be considered before completely wiping out a finite resource such as Open Space near the beach, at one of the most heavily visited tourist locations in California.

I. Misrepresentation of the Site – Open Space and Visitor Serving parking is NOT Underutilized City Property:

When the “affordable housing opportunity sites” for HHH funded permanent supportive housing projects were selected by the City, “underutilized City properties” were required to be used. Open Space is not underutilized property. Visitor-serving parking is a very important use and a priority use in the Coastal Zone.

However, the decision makers were not informed of this information!!

Rather, the property was described to the City Council as:

- Venice Dell Pacific Site (LADOT Lot #731)
- 125 E. Venice Blvd., 4238-024-900 to -911
- Located in Council District 11
- Property is zoned OS-1SL-O
- Parcel size is approximately 122,171 s.f.
- [note: use of a period rather than a comma possibly could be purposeful, to confuse or mislead as to the size of the site]
- **Site Condition:** The site includes two parking lots that are being operated by the LADOT. There is a high water table at the site that may present challenges for construction.
- **Project Assumptions:** This is a large site that can potentially accommodate more than one project.
- Proposed Development Strategies do not need to include the entire site.
- All Development strategies that do utilize the entire site must assume replacement public parking at least a 1:1 ratio.
- Innovative solutions for parking management and capacity are encouraged.
- Developments must comply with the Venice Specific Plan.
- A Coastal Development Permit from the City of Los Angeles will be required, and approval from the California Coastal Commission will also be required.

In addition, the decision makers were provided these two photos, which do not clearly show the adjacent Venice Canals or the proximity to the ocean/beach and Visitor-serving center of Venice. Also, the photos seem to represent the area as degraded, unimportant and underutilized, all of which it is not:



Significant pertinent, required information was NOT provided to the decision makers (City Council):

Nothing was mentioned about the property being in the Coastal Zone nor was it mentioned that the property is located in the Dual Coastal Zone, an area even more protected than the Coastal Zone.

Nothing was mentioned about the project site being Open Space, except for the zone reference (OS-1SL-O), which might not have been clear to some or even noticed. It certainly was not mentioned that the project would require General Plan Venice Community Plan, VCZSP, and LUP amendments to change Open Space to Community Commercial zoning and thus that Spot Zoning was required.

Nothing was mentioned about the project also including retail uses and a restaurant.

Nothing was mentioned about the project being not only adjacent to the world-famous historic Venice Canals but that it would be built on/over the Grand Canal, thus irrevocably modifying this protected Historic-Cultural Monument.

Nothing was mentioned about the existing parking lot being for Visitors to the coast and that the site is specifically designated in the Coastal regulations for an expansion of much needed Visitor parking.

Nothing was mentioned about this project requiring a 43-lot consolidation and that only 2-lot consolidations are allowed by the Coastal regulations.

And no one has acknowledged that the requirements for the use of this land included compliance of the related project with the VCZSP. It was one of the main conditions of approval! Compliance of the related project with the VCZSP is a pre-requisite for the project site's approval. However, the project is not in compliance with the VCZSP in numerous ways, including lot consolidation, height and setbacks and parking, and thus the conditions and pre-requisites for the project have been violated. This proposal must conform with the zoning laws imposed on all other property owners!

Rather, the City Council was informed that this was an underutilized property, which is not true and a deceptive and very misleading way of describing that property, a misrepresentation. Both the non-CD-11 City Councilmembers and the Public will have been deceived unless this project is stopped.

There are many City sites which actually are underutilized that must be considered for this project. Open Space should never be taken away from a community, especially in a visitor-serving area of the California Coastal Zone, Dual Zone.

This property is not an underutilized City-owned property. It is nonsensical and irresponsible to build on valuable, near-beachfront land when far less expensive locations are available, which actually are underutilized properties, including unused/abandoned facilities already owned by the City. If this project is approved, it is tantamount to a theft of the public's property and Open Space.

II. Sea Level Rising, Dewatering, Tsunami, Flooding and other Hazards:

Flooding will create significant problems in the future, and for the applicant--Venice Community Housing (VCH)--and the City to propose a huge, multi-million dollar build out on the Venice median in a flood hazard zone would not only be irresponsible but potentially disastrous. The 140+ unit building would use taxpayer money and citizen owned property, in the face of probable devastation in years to come as sea level rises and when flooding occurs. Building a foundation in a liquefaction zone would be a huge price tag for the build-out and a huge expense for a relatively small number of units, for which citizen money and government subsidies are provided.

There is a high water table at the Venice median site that will present challenges for construction. The dewatering of the Venice median site will have significant adverse impacts to the adjacent Venice Canals ecosystem, habitats and wildlife, in addition to producing significant noise during the initial dewatering construction phase as well as ongoing noise associated with any dewatering operations that may be required on a periodic basis after construction.

The Venice Canals are experiencing leakage. Also, there is a high risk of negative impacts from construction debris on the Venice Canals and the ocean.

The Coastal Act mandates that new development not be sited in hazardous areas. Coastal Act Section 30253 states: "New development shall (a) Minimize risk to life and property in areas of high geologic, flood, and fire hazard..."

The Coastal Commission has been clear that the Venice Canals are in a flood hazard area that is becoming increasingly hazardous due to sea level rising, and that future development must not be sited in coastal areas that cannot adequately or safely accommodate it, such as flood hazard areas.

The Venice Blvd corridor is Venice's primary rescue and emergency escape artery, especially in case of a tsunami. The Venice median sits squarely in a designated tsunami zone and designated flood hazard area, which is becoming increasingly hazardous due to climate change and sea level rise.

The City of Los Angeles, the California Coastal Commission and other authorities, including government engineers, predict that sea level rise and tsunami hazards pose significant threats to the Venice median and surrounding area, and the Venice median, along with other lower-lying areas of Venice, is projected to be underwater in less than 50 years. In fact, due to the impacts of tides on these channels and because the area is already a hazardous area due to its current potential for flooding, the Venice median area adjacent to the canals could be underwater in 20 years or less.

The Venice Local Coastal Program (LCP) currently under review is focusing its response to sea level rise primarily on "managed retreat" (surrendering as opposed to protecting imperiled properties).

III. Permanent Loss of Open Space in the Dual Coastal Zone:

Recent government studies have documented that Venice has a significant deficit with respect to parks and other types of Open Space.

The Venice Community Plan (VCP) has an objective to preserve existing Open Space resources and where possible to develop new Open Space, as the purpose of Open Space is for the preservation of natural resources, managed production of resources and wildlife corridors, outdoor recreation, connecting neighborhoods and people, and the protection of life and property due to natural hazards. Removing such a large area of Open Space flies in the face of policies and programs to protect and conserve Open Space.

The VCP states that **communities must have sufficient Open Space in order to balance new urban development in the community, in order to serve the recreational, environmental, health and safety needs of the community, and to protect environmental and aesthetic resources.**

The VCP states that land designated as Open Space represents only 16% of the VCP area, and includes the beach, the canals, Ballona Lagoon and the esplanades, the Venice Blvd median, and the parks; and that the City should preserve facilities and park space by designating City recreation and park facilities as Open Space.

The VCP directs that Open Space function in one or more of the following ways: recreational and education opportunities, scenic, cultural and historic value, public health and safety, preservation and creation of community identity, rights of way for utilities and transportation facilities, preservation of physical resources or ecologically important areas, and preservation of physical resources.

Coastal Act Section 20250 Location: existing developed area states: "New residential

Coastal Act Section 30250 Location, existing developed area 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.*" **The beach, the Boardwalk and the historic Venice Canals are all Coastal Resources on which this project would have significant adverse effects.**

Elimination of Open Space on the Venice median could amplify the impact of a tsunami and other flooding events on surrounding structures, including the historic Venice Canals, by impeding, deflecting or otherwise redirecting flood waters, while significantly impeding escape and evacuation. This would have a huge, devastating impact on the residential neighborhoods to the north and south of the Venice median.

Councilmember Bonin campaigned on express promises that he would preserve Open Space, put an end to Spot Zoning and require that new developments be consistent with the surrounding community. This project would eliminate Open Space. It requires Spot Zoning (General Plan Venice Community Plan, VCZSP and LUP amendments applied to a specific parcel) and it violates the VCZSP and LUP standards and policies in terms of lot consolidation, height and setbacks and parking. The project is grossly incompatible with the surrounding community. Councilmember Bonin has reneged on his promises.

IV. Coastal Act requires priority for visitor serving uses:

The LUP Recreational Opportunities Policy III.A.1. General states: "New recreational opportunities should be provided, and existing recreational areas shall be protected, maintained and enhanced for a variety of recreational opportunities for both residents and visitors, including passive recreational and educational activities, as well as active recreational uses....acquisition, expansion and improvement of parks and facilities throughout the Venice Coastal Zone shall be encouraged and accelerated....where feasible and compatible with the surrounding neighborhood, recreational uses shall be located in conjunction with other new public facilities, such as public parking lots, and recreation facilities shall be refurbished and constructed to maximize recreational opportunities."

Venice Beach is arguably the most popular visitor destination in Southern California and the parking lot on the median supports beach access for visitors. The proposed project would be a significant deterrent to beach visitors.

Coastal Act Section 30213 states: "Lower cost visitor and recreational facilities shall be protected, encouraged and where feasible, provided. Development providing public recreational opportunities is preferred."

Coastal Act Section 30220 states: "Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses."

Coastal Act Section 30222 states: "The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development. but not over agriculture or coastal-dependent industry."

Coastal Act Section 30224 states: "Increased recreational boating use of coastal waters **shall** be encouraged, in accordance with this division, by developing dry storage areas, **increasing public launching facilities**, providing additional berthing space in existing harbors, limiting non-water dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land."

The LUP Policy Coastal Waterways Policy III.D.2. Boating Use of Canals states: "...A public boat launch facility was built as part of the Venice Canals Rehabilitation Project at the Grand Canal and North Venice Blvd. The City **shall protect** the public's ability to access the canals by boat by **maintaining public access to the Grand Canal public boat launch**. The facility shall **provide adequate on-site public parking consistent with the sizes and types of boats to be launched** and frequency of launching pursuant to the County Department of Small Craft Harbors standards." **The Coastal Commission has mandated these conditions for this public boat launch access connected to 7 parking spaces at that location, and the project would violate this policy and mandated conditions.**

The Coastal Act requires, and it is to L.A.'s significant economic advantage, that Venice Beach be made more attractive to beachgoers, tourists and other visitors, **by improving beach access** while enhancing Venice Beach as a destination, with **some combination of expanded parking**, perhaps a transportation terminal, **expansion of Open Space**, expansion of restrooms, showers and other tourist facilities, and a visitor's center.

It is the policy of City, County, State and U.S. agencies to increase Open Space and never to decrease it. There are many organizations that have funds for purposes of acquiring Open Space. In fact, the LUP Policy Recreational Opportunities Implementation Strategies states: "...The City shall maintain an inventory of vacant land suitable for potential acquisition as public **Open Space**, and **shall encourage continuing efforts** by County, State and Federal agencies **to acquire such land** and work with the Quimby (Park) funds, the Tide-Lands Oil Trust Funds, and the Venice Surplus Real Property Fund. Unutilized or underutilized public land (including rights-of-way), particularly publicly-owned lands having potential for multiple uses, such as school playgrounds, should be made available for park and recreational uses." **We need more Open Space and not huge, incompatible structures taking over our existing Open Space.**

The LUP Coastal Waterways Policy III.D.6. Venice Canals Parks states: "**New parks, with parking to the rear**, shall be considered on some of the City-owned lots on the canals **[in other words, the Venice median]**, **provided that such facilities are compatible with the existing residential use of the area.**"

LUP Policy I . F. 3 . Venice Canals: "The historic integrity of the Venice Canals shall be preserved. The canals are deemed to be significant as an early example of community recreational planning in a coastal marshlands area. Included in the historic district are the six canals, their associated sidewalks and a number of pedestrian and vehicular bridges. The Venice Canals are listed on the National Register of Historic Places as an historic district (August 30, 1982). Additionally, the City of Los Angeles Cultural Heritage Commission declared the Venice Canal System a Los Angeles City Historic-Cultural Monument (HCM No. 270, August 2, 1983)." **This project would be built on/over the Historic Venice Grand Canal footprint!! Such sites are afforded special regulations governing alteration, and**

Canal footprint: Such sites are afforded special regulations governing alteration, and Federal and State laws do not allow an Historic-Cultural Monument such as the Venice Canals to be modified and degraded.

The City of L.A. has already destroyed the vast majority of the Venice Canals system (and attendant features) for which Venice is named and first gained its worldwide reputation, and what little remains today must be assiduously protected.

Additional restrooms are sorely needed near the Boardwalk, and the Venice median location is the best and only available location for this visitor-serving, recreation-related use.

V. Violations of the VCZSP and LUP re. Shoreline Access/Parking:

A principal objection to the project is the impact on parking in the area. **The subject parking lot is not an underutilized use.** On any summer day and for much of the off season, cars line up for blocks on North Venice Blvd, waiting to enter that lot. Many properties in the immediate area are grandfathered with no off-street parking. Taxpaying residents already must rely on street parking for themselves and their visitors. Also, taxpaying residents already compete with beach visitors for street parking during peak hours. **The best and highest use of the Venice median property is for visitor-serving parking.**

The VCZSP Section 14. Venice Coastal Parking Impact Trust Fund ("Fund") states: "The Fund shall be used for the purpose of accepting and retaining funds collected by the Department of Transportation pursuant to this Specific Plan for any expenditure only for parking mitigation measures in, adjacent to or serving the Beach Impact Zone. Those improvements shall include but not be limited to: Venice Blvd median public parking facility improvement, including land acquisition and construction."

As per at least the last two Councilmembers for the area, the In Lieu Parking fees that have historically been paid into the Venice Coastal Parking Impact Trust Fund were to go towards expansion of parking, specifically on the Venice median, in order to mitigate the impact on public parking of the additional residential and commercial parking requirements for which the fees were paid.

The LUP designates the parcel where the Venice median project is to be built for parking. Developers who have not provided adequate parking for their projects in Venice have paid "in-lieu" fees to the City of L.A. for years, with those fees being earmarked for parking solutions and expansion. By law (the VCZSP and the LUP), these funds are required to be funneled back into parking solutions for development/expansion of public parking facilities that improve public access to the Beach Impact Zone area, using this very site at the Venice median. LUP III.D.6. specifically requires that new parks, with parking to the rear, shall be considered on City-owned parking lots on the canals (aka Venice median). **Placing the project at this location would eliminate the ability to meet that LUP requirement.**

The LUP Parking Policy II.A.1. General states: "It is the policy of the City to provide increased parking opportunities for both visitors and residents of Venice, and improve summer weekend conditions with respect to Venice Beach parking and traffic control."

The LUP Policy II.A.2. Expansion of Public Beach Parking Supply states: "The construction of new public parking facilities should be implemented, as well as maximizing the use of

existing ones by restriping existing parking lots or converting them to multi-level structures where consistent with other Coastal Act policies...the established Venice Coastal Parking Impact Trust Fund, into which in-lieu parking fees shall be paid, will continue to be utilized for expenditure on improvement and development of public parking facilities that improve public access to the Venice Coastal Zone as specified in the LUP."

Inadequate parking near the beach for visitors and residents is one of the LUP's Venice Coastal Issues. According to the Coastal Commission, *Venice has one of the most serious parking/coastal access problems in the state's Coastal Zone.* The coastal regulations prohibit expansion of the beach surface parking lots. **There are no substitutes for the Venice median for purposes of addressing the significant and growing parking deficit in Venice.**

In addition, in conjunction with the VCP, the City is recommending that the Windward Ave block between Ocean Front Walk and Pacific Ave become a pedestrian promenade, which would result in the loss of 40 parking spaces on that block. The only possible location for an expansion of parking to replace the loss of those spaces is at the Venice median.

VI. Character, Mass and Scale/Aesthetics:

This is an out of proportion, misguided project. This project would not only obliterate any remaining, valuable and much-needed Open Space in the community, but the sheer size of the project would overwhelm the adjacent neighborhood. The proposed architecture is incompatible with the surrounding neighborhood. The foreboding façade does not convey a pedestrian feel or a welcoming appearance to those who would call it "home."

There is a requirement in the Agreement with the City that the use must be consistent with the City's adopted land use plans. In fact, **the project does not comply with numerous sections of the current VCZSP and LUP, including lot consolidation, heights, setbacks, parking, etc.** Thus, in order to comply the applicant is requesting significant changes to these laws (aka Spot Zoning). These are laws that have applied to every other project in Venice and have not been changed for almost 20 years.

As a condition of approval of the Venice median site, the project was required to comply with the existing VCZSP and LUP and did not allow for the VCZSP and LUP to be amended with Spot Zoning!

VII. Public Participation:

The development and approval process around this project has not been transparent. The public was invited to review and comment on the project at a series of barely-publicized workshops, seemingly only after architectural plans were complete, and as a result VCH has resisted addressing any concerns or suggested changes. The process has pitted neighbors against neighbors. There is also ambiguity re. who will be housed at the project, what the services provided will be, and how the project will be funded. A project of this size and scope deserves unfettered public feedback, which should have been facilitated by the City earlier in the planning process, **prior to the site being identified.**

The assertion that the construction of a homeless shelter or housing is widely supported by the community is a canard. Councilmember Bonin and the developers count on a lack of central organization among the divergent enclaves impacted by this scheme: Venice Canals, North Venice Historic walk streets, Oakwood neighborhood, Historic Lost Venice Canals neighborhood, Oxford Triangle, etc. There has never been a comprehensive Venice community survey on this project.

It is unlikely that property owners who have upwards of \$2 million invested in adjacent properties would support a project that will sink property values, and will invite crime, public inebriation, defecation, sexual assault, and drug use, literally on their doorsteps.

VIII. Waste of Public Resources

To build a project like this in a flood hazard zone, with sea level rising becoming a more and more significant issue, would be a tremendous waste and mismanagement of tax payer funds, whether City, State or Federal funding/tax credits.

The L.A. City Controller has issued two audits, both of which indicate that the City needs to change course on such projects as the cost per unit is unacceptable and not cost effective. The per unit estimate of cost approximates the cost of market rate condominiums in the City of L.A. and a single-family home in L.A. County. Too few would be helped to justify an expenditure of this level.

First, we strongly support the findings and recommendations of the City Controller in the required audit report dated October 10, 2019. As our City Controller states, **previously approved projects may warrant a fresh look.**

In addition, the second Controller's audit report, dated September 9, 2020, states that for such projects that are in the early planning stages he continues to recommend that the City reallocate funding commitments to projects with lower costs or to interim housing and other facilities.

IX. Conclusion:

This proposed project is simply not feasible at this location due to all of the aforementioned reasons.

The Venice median proposed project violates the conditions and pre-requisites of the site approval, violates the law, and violates the Public Trust. THIS PROJECT MUST BE DENIED.

