



Venice Neighborhood Council

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October 31, 2021

Re: 2102-2120 S Pacific Avenue,
116-302 E North Venice Boulevard,
2016-2116 S Canal Street
319 E South Venice Boulevard

AKA: Reese Davidson Project

Council File: 21-0829 and 21-0829 s1

Case: VTT-82288
CPC-2018-7344-GPAJ-VZCJ-HD-SPP-SPP-CDP-MEL-WDI-SPRPHP
ENV-2018-6667-SE

Applicant: Sarah Lett Hollywood Community Housing Corporation
Becky Dennison Venice Community Housing Corporation

Representative: Chris Murray Rosenheim and Associates

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To whom it may concern:

Below is a development project description followed by a Venice Neighborhood Council, Board of Officers motion that was passed in the May 18, 2021 General Board Meeting. The entire project was reviewed by the community in our Land Use and Planning Committee (LUPC) before it was represented to the Board of Officers. Please consider the time and energy the community and the VNC has dedicated to this project before taking action and making our recommendation to you all, our City officials.

Case Description: The demolition of an existing surface parking lot containing 196 spaces bisected by Grand Canal, and a two story 4 unit residential structure and the construction, use and maintenance of a 104,140 Sq. Ft. mixed use 100 percent affordable housing development.

A 36,340 Sq Ft structure west of Grand Canal, and a 67,800 Sq Ft structure east of Grand Canal consisting of 140 residential units, 136 affordable, 4 manager units, 685 Sq. Ft. of social service office uses, 2255 Sq. Ft. of retail uses, 810 Sq. Ft. of restaurant use with 500 Sq. Ft. of outdoor Service Floor Area and 3,155 Sq. Ft. of community arts center/art studio. The structure west of Grand Canal is 3 stories and 35 in height with a 59 foot tall campanile located at the Northwest corner of the subject site with a roof access structure resulting in a structure with a maximum 67 feet in height and five stories. The structure east of Grand Canal is 3 stories and 35 ft in height. The project will provide a total of 360 on site automobile parking spaces comprising of 61 residential spaces 42 commercial spaces 196 (replacement) public spaces, 23 beach impact zone spaces and 38 non required spaces and 136 bicycle spaces.

Requested Actions: VTT-82288 The Advisory Agency shall consider:

1. Pursuant to Assembly Bill 1197 in furtherance of providing Supportive Housing under Public Resources Code Section 21080.27(b)(1), that based on the whole of the administrative record as supported by the justification prepared and found in the environmental case file, the project is statutorily exempt from the California Environmental Quality Act;

2. Pursuant to Los Angeles Municipal Code (LAMC) Sections 17.03, 17.06, and 17.15, a Vesting Tentative Tract Map, VTT No. 82288, for the merger and re-subdivision of 40 existing lots into two master ground lots and seven airspace lots; and

3. Pursuant to Los Angeles Municipal Code Section 17.53-D, a Waiver of Dedication and/or Improvements to waive the requirement to:

- a. Dedicate 20.5 feet to complete a 43-foot half right-of-way along Pacific Avenue;
- b. Dedicate a 15-foot by 15-foot corner cut at the intersection of South Venice Boulevard and Pacific Avenue;
- c. Dedicate a 15-foot by 15-foot corner cut at the intersection of North Venice Boulevard and Pacific Avenue;
- d. Dedicate a 15-foot by 15-foot corner cut at the intersection of South Venice Boulevard and Dell Avenue; and
- e. Dedicate 10 feet to complete a 30-foot half right-of-way along Dell Avenue.

CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR-PHP On behalf of the City Planning Commission, the Hearing Officer will take public testimony regarding the following:

4. An exemption from CEQA, pursuant to California Public Resources Code (PRC) Section 21080.27(b)(1);

5. Pursuant to Los Angeles City Charter Section 555 and LAMC Section 11.5.6,

- a. a General Plan Amendment to the: a. Venice Community Plan General Plan Land Use Map to amend the land use designation of the subject site from Open Space and Low Medium II Multiple Family Residential to Neighborhood Commercial;
- b. Certified Venice Local Coastal Program Land Use Plan (LUP) maps to amend the land use designation of the subject site from Open Space and Low Medium II Multiple Family Residential to Neighborhood Commercial; and
- c. Certified Venice Local Coastal Program Land Use Plan (LUP) text pertaining to the proposed development;

6. Pursuant to LAMC Section 12.32 F, a Vesting Zone Change and Height District Change from OS-1XL-O to (T)(Q)C2- 1L-O and pursuant to LAMC Section 11.5.11(e) and California Government Code 65915(k), three Developer Incentives to permit:

- a. Reduced residential parking pursuant to AB744;
- b. The required residential parking for the building on the East Site to be located in the building on the West Site; and NOTIFICATION REQUIREMENT TO OWNERS: Within a 500-foot Radius AND OCCUPANTS: Within a 500-foot Radius AND INTERESTED PARTIES ☒ Puede obtener información en Español acerca de esta junta llamando al (213) 978-1300 planning4la.org Initial hearing – 8/03/2020 Page 3
- c. RAS3 side and rear yard requirements per LAMC 12.10.5 in lieu of the yard requirements in the proposed C2 zone;

7. Pursuant to LAMC Section 11.5.7 G, a Specific Plan Amendment to the Venice Coastal Zone Specific Plan to:

- a. Create a new subarea “Subarea A” to permit a Permanent Supportive Housing project that includes Restricted Affordable housing units with supportive services and establishes Land Use Regulations and Development Standards; and

- b. Amend the Map Exhibits to add the new subarea and change the zoning from OS-1XL and RD1.5 to C2-1LO for the new subarea;
- 8. Pursuant to LAMC Section 11.5.7 C, a Project Permit Compliance Review for a project within the Venice Coastal Zone Specific Plan;
- 9. Pursuant to LAMC Section 12.20.2, a Coastal Development Permit for a Project located within the Dual Permit Jurisdiction of the California Coastal Zone;
- 10. Pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, a Mello Act Compliance Review for demolition of four Residential Units and the construction of 140 Residential Units in the Coastal Zone;
- 11. Pursuant to LAMC Section 16.05, Site Plan Review for a Project which creates or results in an increase of 50 or more dwelling units.

MOTION Passed 16 Yea, 0 Nay, 1 Abstain

The VNC Board recommends denial of the project as presented due to the following:

- 1. Failure to Comply with General Plan, Coastal Plan, LAMC and Venice Specific Plan The project does not comply with the General Plan, Specific Plan, or Coastal Plan. The VNC has already submitted a CIS recommending denial of the General Plan Amendment and rezoning request for the Specific Plan amendment, all which would be required for this project. Applicant has not demonstrated hardships warranting the ZAA and waiver requests. Waivers include but are not limited to in lieu fees for use of Linnie Park.
- 2. Sea Level Rise Housing a vulnerable population of residents in a known high risk flood zone due to sea level rise is extremely irresponsible and dangerous, analogous to building public housing in the lowest parts of New Orleans when a future hurricane storm surge is obviously inevitable. Moreover, this project relies heavily if not exclusively on public funding, meaning the taxpayer is underwriting the developer's unsuitable site selection and resulting flood risk.

3. Mass Scale and Character The mass scale and character does not conform to the metrics in the Specific Plan.

4. Abuse of Taxpayer Funding The estimated cost of this project is staggeringly over \$100 million to create 136 low income units-a price tag of nearly \$750,000 per unit. At this rate, it would cost our city over \$22 trillion to house 30,000 people When taxpayers authorized various tax increases and bond measures to solve the homeless crisis, this was surely not what they had in mind. Taxpayers deserve responsible spending of finite resources to alleviate this crisis. Next the underlying land for this project (currently owned by the city,) is proposed to be donated to the developers, depriving Venice from large swaths of open space and an extremely high value asset, sale of which could directly benefit the community. In sum, the project exemplifies a gross waste of taxpayer dollars that will not alleviate the immediate needs of relief for our unhoused. Per Judge David O Carter's recent ruling in federal court, these funds could and should be used for immediate shelter of unhoused residents. The humanitarian crisis on the streets of Venice is neither alleviated nor changed for those who can't afford to wait for enough expensive housing to be built years late and millions of dollars over budget.

5. The Project Perpetuates an Unhoused Containment Policy The City of Los Angeles has systematically created a containment zone of homeless housing service providers and service infrastructure all within the Venice area, akin to a "Skid Row West." This crush of homeless services and housing has served as a magnet for more homelessness and crime to proliferate in this community disparately from others in the district. Clearly this policy is unlawfully discriminatory, unfair to Venetian residents, and exacerbates a humanitarian disaster rather than solve it.

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Thank you for your time and considerations in reviewing project and understanding how strongly our community feels about this proposal.

Sincerely,


James Murez

VNC President