

Public Comments Not Uploaded Submission for PLUM hearing, 5/17/22 re: Council File Nos. 21-0829 and 21-0829-S1**Safe Coastal Development** <safecoastaldevelopment@gmail.com>

Sun, May 15, 2022 at 10:24 PM

Reply-To: clerk.plumcommittee@lacity.org

To: councilmember.cedillo@lacity.org, gilbert.cedillo@lacity.org, councilmember.krekorian@lacity.org, paul.krekorian@lacity.org, councilmember.blumenfield@lacity.org, councilmember.raman@lacity.org, nitty.raman@lacity.org, councilmember.koretz@lacity.org, Paul.koretz@lacity.org, councilmember.martinez@lacity.org, Nury.martinez@lacity.org, councilmember.rodriguez@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.price@lacity.org, councilmember.wesson@lacity.org, Councilmember Mike Bonin <councilmember.bonin@lacity.org>, mike.bonin@lacity.org, councilmember.lee@lacity.org, councilmember.ofarrell@lacity.org, mitch.ofarrell@lacity.org, councilmember.kevindeleon@lacity.org, councilmember.buscaino@lacity.org, joe.buscaino@lacity.org, debby.kim@lacity.org, karo.torossian@lacity.org, lisa.hansen@lacity.org, andrea.conant@lacity.org, joan.pelico@lacity.org, ackley.padilla@lacity.org, christine.jerian@lacity.org, solomon.rivera@lacity.org, curtis.earnest@lacity.org, heather.hutt@lacity.org, chad.molnar@lacity.org, hannah.lee@lacity.org, jeanne.min@lacity.org, jennifer.barraza@lacity.org, jenny.chavez@lacity.org, Armando Bencomo <clerk.plumcommittee@lacity.org>

Please see attached letter and Venice Neighborhood Council CIS, in relation to Agenda Item #11 for May 17, 2022 PLUM hearing re: Council File # Council File Nos. 21-0829 and 21-0829-S1

Coalition for Safe Coastal Development
<https://www.safecoastaldevelopment.org>

2 attachments**05-15-22 Ltr to City Council VNC letter re. Venice Median Project.pdf**
49K**VNC CIS Venice Median November 2, 2021.pdf**
861K



*P.O. Box 1185
Venice, CA 90294*
SafeCoastalDevelopment@gmail.com

May 15, 2022

VIA ELECTRONIC MAIL

Hon. Nury Martinez, Council President and
Los Angeles City Council
c/o City Clerk
200 North Spring Street
Los Angeles, CA 90012

Re: Venice Neighborhood Council letter recommending denial of the
Reese Davidson project
VTT-82288; ENV-2018-6667-SE; CPC-2018-7344-GPAJ-VZCJ-HD-SP-
SPP-CDP-MEL-SPR-PHP-1A
Council File Nos. 21-0829 and 21-0829-S1

Dear Council President Martinez and City Council,

In 2000, the voters approved changes to the City Charter to create
Neighborhood Councils, with the intention that their opinion should count for
something.

Maybe someone on this Council will read the attached letter from the
Venice Neighborhood Council regarding their reasons for recommendation of
denial of the Reese Davidson project.

Sincerely,

Coalition for Safe Coastal Development

Your Community Impact Statement has been successfully submitted to City Council and Committees.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at NCsupport@lacity.org.

This is an automated response, please do not reply to this email.

Contact Information

Neighborhood Council: Venice Neighborhood Council

Name: James Murez

Phone Number: (310) 399-1490

Email: james.murez@venicenc.org

The Board approved this CIS by a vote of: Yea(16) Nay(0) Abstain(1) Ineligible(0) Recusal(0)

Date of NC Board Action: 05/18/2021

Type of NC Board Action: Against unless Amended

Impact Information

Date: 11/02/2021

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 21-0829

Agenda Date: 11/02/2021

Item Number: 2

Summary: Please consider the following new developments in this case before taking any action. On 10/19/2021 at the regular scheduled Venice Neighborhood Council, General Board of Officers meeting, it was announced by the public that a significant change of funding for this project has occurred, namely Prop. 2 financing is now being used for this project. Because this funding restricts occupants to be mentally disabled and/or have disorders, the associated potential impacts must be considered and recommendations submitted by the community and the VNC before the public hearing process concludes. Therefore, I request no action is taken at this time to allow the VNC time to consider these issues. A 60 day delay will be ample for this consideration. Please review the attached two documents. Sincerely, James Murez Venice NC, President



Venice Neighborhood Council

PO Box 550, Venice, CA 90294
www.VeniceNC.org Email: info@VeniceNC.org



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

VNC Land Use and Planning Committee Members

Matthew Royce
Carlos Zubieta
Michael Jensen

By Email: Mike.Bonin@lacity.org
Vince.Bertoni@lacity.org
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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



Venice Neighborhood Council

PO Box 550, Venice, CA 90294
www.VeniceNC.org Email: info@VeniceNC.org



October 31, 2021

By email: Mayor Eric Garcetti mayor@lacity.org
Mike Bonin mike.bonin@lacity.org
Jack Ainsworth John.Ainsworth@coastal.ca.gov
Steve Hudson Steve.Hudson@coastal.ca.gov
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Kinikia Gardner Kinikia.Gardner@lacity.org
Laura MacPherson Laura.Macpherson@lacity.org

Re: Denial of Zone Change for the Venice Median from Open Space to Neighborhood Commercial

Case: CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR

To whom it may concern:

Please be advised that at a regular public meeting of the Venice Neighborhood Council (VNC) Board of Officers held on December 17, 2019 the following motion was approved.

MOTION: The Venice Neighborhood Council strongly recommends that the City Council and the Coastal Commission DENY CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR requesting amendments to the L.A. General Plan Venice Community Plan, the certified Venice Local Coastal Program Land Use Plan and Venice Coastal Zone Specific Plan for a Zone Change for the Venice median from Open Space to Neighborhood Commercial.

ACTION: 13 Yea, 6 Nay, 1 Abstained

Sincerely,
James Murez
James Murez
VNC President

Attached: Supporting Documents, 4 pages

Supporting Documents

Venice Neighborhood Council, December 17, 2019, Recommendations Denial of Zone Change

Case: CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-WDI-SPR

WHEREAS:

1. The Venice median is located on Open Space in the Dual Permit Jurisdiction Coastal Zone, just one block from the beach and the center of the Venice Boardwalk;
2. The Venice community—including the beach, the Boardwalk, the Venice Canals, and the eclectic architectural styles of the neighborhoods 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;
3. Recent government studies have documented that Venice has a significant deficit with respect to parks and other types of Open Space;
4. The L.A. General Plan 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;
5. 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;
6. The VCP states that land designated as Open Space represents only 16% of the Venice Community Plan 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;
7. 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...;
8. 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;"
9. 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;"
10. 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;"

11. 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;

12. The Coastal Commission, Certified Venice Local Coastal Program, Land Use Plan (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;"

13. 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 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;"

14. 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;"

15. 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, provided that such facilities are compatible with the existing residential use of the area;"

16. 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;"

17. 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;"

18. Venice Coastal Zone Specific Plan (VSP) Ordinance: 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....;"

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

19. There is a high water table at the Venice median site that will present challenges for construction;

20. 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;

21. The Venice median sits squarely in a designated tsunami zone, and designated flood hazard areas have been significantly increased in recent years in light of climate change and sea level rise;

22. The Venice Canals are experiencing leakage;

23. 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;

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

25. The Venice Blvd corridor is Venice's primary rescue and emergency escape artery, especially in case of tsunami;

26. Elimination of Open Space and construction of a large development 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;

Other:

27. The Venice Canals area is listed on the National Register of Historic Places as The Venice Canals Historic District, and the Federal designation for the area is for Community/Recreational Planning;

28. 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;

29. 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;

30. There are no substitutes for the Venice median for purposes of addressing the significant and growing parking deficit in Venice;

31. 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;

32. 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;

33. There does not appear to be a shortage of commercial uses in the area and there is no demonstrated demand that would support a conversion from Open Space to commercial use, while there clearly IS a shortage of Open Space and parking in the area;

34. Once our precious and limited Open Space is converted to another zoning classification, it's gone forever;

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