

Communication from Public

Name: Kevin Sapin

Date Submitted: 06/20/2026 11:23 AM

Council File No: 26-0721

Comments for Public Posting: 6/20/2026 Dear PLUM Committee Members, I am writing to urge you to grant the appeal of the proposed development at 1410–1422 Main Street in Venice. This project was approved despite significant legal errors and unresolved public safety concerns, including reliance on a narrow residential alley for all access to residences, restaurants, deliveries, and services. The approval should be reversed because:

- The CEQA categorical exemption was granted despite substantial evidence of traffic, circulation, parking, and cumulative impacts.
- The Mello Act findings fail to demonstrate that residential use of the existing homes is no longer feasible.
- The project record contains material inaccuracies and inconsistencies, including conflicting descriptions of site conditions and prior uses.
- The findings do not adequately demonstrate consistency with the Coastal Act, Venice Land Use Plan, and Venice Coastal Zone Specific Plan.

In addition, the project relies entirely on Toledo Court, a narrow residential alley, for access to 20 residential units, multiple restaurant uses, deliveries, trash collection, ride-share activity, and service vehicles. Key concerns include:

- The alley is heavily used by residents, children, pedestrians, cyclists, pets, seniors, and individuals with disabilities.
- The project record does not adequately analyze restaurant traffic, delivery activity, loading operations, or emergency vehicle access.
- Garbage collection, loading conflicts, ride-share activity, and circulation impacts remain insufficiently studied.
- The resulting congestion and safety risks have not been fully evaluated.

As a nearby resident of 30 years, I have experienced the Toledo Court function as a quiet residential alley. It was never designed to serve as the primary access point for a project of this scale and intensity. The scale and dimension of traffic, noise and commercial density is not adequately understood by the developer and will only lead to reductions in quality of neighborhood life. This is not a well thought out project, as it only serves to increase congestion and fundamentally change the nature of the block and introduce impacts that have not been adequately studied. For these reasons, I respectfully request that the PLUM Committee grant the appeal and reverse the approval. At a minimum, the matter should be remanded for full environmental review, corrected findings, and further analysis of the project's safety, circulation, and Coastal

Zone impacts. Thank you for your consideration. Sincerely, Kevin
Sapin

Communication from Public

Name: Cindy Graham

Date Submitted: 06/21/2026 05:01 PM

Council File No: 26-0721

Comments for Public Posting: Dear PLUM Committee Members, I am writing to urge you to grant the appeal of the proposed development at 1410–1422 Main Street in Venice. This project was approved despite significant legal errors and unresolved public safety concerns, including reliance on a narrow residential alley for all access to residences, restaurants, deliveries, and services. The approval should be reversed because: - The CEQA categorical exemption was granted despite substantial evidence of traffic, circulation, parking, and cumulative impacts. - The Mello Act findings fail to demonstrate that residential use of the existing homes is no longer feasible. - The project record contains material inaccuracies and inconsistencies, including conflicting descriptions of site conditions and prior uses. - The findings do not adequately demonstrate consistency with the Coastal Act, Venice Land Use Plan, and Venice Coastal Zone Specific Plan. In addition, the project relies entirely on Toledo Court, a narrow residential alley, for access to 20 residential units, multiple restaurant uses, deliveries, trash collection, ride-share activity, and service vehicles. Key concerns include: - The alley is heavily used by residents, children, pedestrians, cyclists, pets, seniors, and individuals with disabilities. - The project record does not adequately analyze restaurant traffic, delivery activity, loading operations, or emergency vehicle access. - Garbage collection, loading conflicts, ride-share activity, and circulation impacts remain insufficiently studied. - The resulting congestion and safety risks have not been fully evaluated. As a resident who uses Toledo Court to access my garage, I am personally concerned about how this project would affect my family and neighborhood in the following ways: - Emergency Access: I am concerned that increased traffic, loading activity, and delivery vehicles could obstruct the alley and delay emergency response when seconds matter. - Long-Time Resident: I have lived in this neighborhood for 25 years and have watched Toledo Court function as a quiet residential alley. It was never designed to serve as the primary access point for a project of this scale and intensity. I have a Ford F-250 and find that I avoid that end of the alley in my passenger truck due to close quarters / turns already. I cannot imagine delivery trucks fitting back there without hitting structures or blocking ingress and egress on that end of Toledo Court. It is

utterly absurd. For these reasons, I respectfully request that the PLUM Committee grant the appeal and reverse the approval. At a minimum, the matter should be remanded for full environmental review, corrected findings, and further analysis of the project's safety, circulation, and Coastal Zone impacts. Thank you for your consideration. Sincerely, Cindy Graham 247 Market Street Venice, CA 90291

Communication from Public

Name: Elizabeth Burnette

Date Submitted: 06/21/2026 08:00 PM

Council File No: 26-0721

Comments for Public Posting: Dear Planning and Land Use Management Committee, On December 9, 2025 The VNC voted to recommend denial of the Project at 1410-1414-1422 Main Street in Venice. The City Planner ignored the VNC recommendation for denial and the LUPC Staff report explaining the reasons, NOT even mentioning the VNC's position or ANY of the issues raised in its City Planning Report Recommendation to the City Planning Commission. What is going on here? As a 27 year resident of the neighborhood close to the proposed development, I am requesting that you GRANT the APPEAL. I understand the project was approved even though there were major legal errors related to this approval. I have two major concerns: 1. The inaccurate findings do not show any consistency with the Coastal Act, the Venice Land Use Plan, and Venice Coastal Zone Specific Plan. 2. The narrow RESIDENTIAL ALLEY is NOT big enough for all the traffic that will clog this narrow alley if this is approved. Aside from current residential normal vehicle access, add in delivery activity, loading, garbage trucks, restaurant traffic, ride share activity...what about emergency services?? One car and one pedestrian cannot comfortably be in this alley at the same time as it is! I cannot understand why a full environmental review with corrected findings with thorough analysis for safety, circulation and Coastal Zone Impacts cannot take place. Please grant the appeal. It seems insane and corrupt not to. While no one opposes the right for a land owner to build, the approval does not seem based on accurate findings and it is quite distressing thinking of what this wonderful neighborhood with become with no regard to facts. Thank you. Sincerely, Elizabeth Burnette

Communication from Public

Name: Tami Hausman

Date Submitted: 06/21/2026 08:57 PM

Council File No: 26-0721

Comments for Public Posting: I live near 1410-1422 Main Street, and I'm asking you to uphold the appeal of the development proposed there. At the very least, please send it back for further review and corrected findings. Venice needs housing, and I'm all for building it well. But this proposal fails the neighborhood, compromises public safety, and runs counter to the planning rules the city wrote to manage how LA grows. The building is too big. Its height and bulk overwhelm everything residential around it. All of its access runs through Toledo Court, a narrow residential alley that would have to carry the building's apartments, several restaurants, deliveries, trash pickup, and service trucks all at once. The application ignores critical traffic, safety, and emergency-access issues. Additionally, it doesn't match Venice policy on neighborhood character, scale, or livability. And the community has said no in big numbers, including unanimous votes against it from the Venice Neighborhood Council and its Land Use and Planning Committee. I deal with Toledo Court every day. Getting my own car out already takes time. The alley is so tight you can't drive more than 5 or 10 miles an hour down it. It is full of cars, trash cans, loose garbage, contractors, people on foot, and neighbors walking dogs. It's already beyond capacity. Add one more obstacle and it stops being safe. There's no way it can handle the traffic this project assumes. Part of why I rented my house at 221 Market Street, which overlooks this site, is that I can work from home. Months of construction, and then a permanent increase in traffic through an alley that was never built for it, takes that away from me. So this project costs the people who already live here. It gives us nothing back. Finally, a project that needs that many exceptions to fit on its lot is a project that doesn't belong on that lot. The only thing that explains forcing something this big into a quiet residential block is the developer's bottom line, not any benefit to the people of Venice or the city of LA. You can support development and still insist the review rest on accurate findings and a full record. There are way too many unanswered questions about compatibility, safety, and policy to let this move forward as written. Thank you for your time. Tami Hausman, PhD

Communication from Public

Name: David Ewing

Date Submitted: 06/22/2026 02:19 PM

Council File No: 26-0721

Comments for Public Posting: Dear PLUM Committee Members, I am writing to urge you to grant the appeal of the proposed development at 1410–1422 Main Street in Venice. This project was approved despite significant legal errors and unresolved public safety concerns, including reliance on a narrow residential alley for all access to residences, restaurants, deliveries, and services. The approval should be reversed because:

- The CEQA categorical exemption was granted despite substantial evidence of traffic, circulation, parking, and cumulative impacts.
- The Mello Act findings fail to demonstrate that residential use of the existing homes is no longer feasible.
- The project record contains material inaccuracies and inconsistencies, including conflicting descriptions of site conditions and prior uses.
- The findings do not adequately demonstrate consistency with the Coastal Act, Venice Land Use Plan, and Venice Coastal Zone Specific Plan.

In addition, the project relies entirely on Toledo Court, a narrow residential alley, for access to 20 residential units, multiple restaurant uses, deliveries, trash collection, ride-share activity, and service vehicles. Key concerns include:

- The alley is heavily used by residents, children, pedestrians, cyclists, pets, seniors, and individuals with disabilities.
- The project record does not adequately analyze restaurant traffic, delivery activity, loading operations, or emergency vehicle access.
- Garbage collection, loading conflicts, ride-share activity, and circulation impacts remain insufficiently studied.
- The resulting congestion and safety risks have not been fully evaluated.

As a Venice resident, I am personally concerned about how this project would affect my family and neighborhood. We have watched the City torture logic to grant undeserved permits that degrade the quality of life for residents, to create problems for City services, and to ignore, to the best of its ability, the requirements of the California Coastal act, as expressed for the past 40+ years in the the Venice Coastal Land Use Program (LCP). The LCP was intended as a short-term measure, in much the spirit of an Interim Control Ordinance, until the City produced an acceptable plan for municipal legislation to comply with the Coastal Act, which it never has and doesn't appear to have any intention of doing. In the instant case, the Mello Act is also abused. the City Planner in charge of this project pretends that the proposed mixed use project is not a commercial

use, even though the law clearly defines it as such. That sleight of hand would allow this project to violate the Mello Act, as the City has done habitually. The Mello Act is meant to protect affordable housing in coastal zones, and since there are only two LA City Council Districts with coastal zones, the City Council has never been overly concerned with its purpose or enforcement, as long as the relevant Council Member is amenable. It's not surprising that a scofflaw city would blithely approve a scofflaw project, ignoring the principles and protections of City Planning that are built into its own codes, but it is dis-spiriting to witness it with such regularity and have to live with the consequences. For these reasons, I respectfully request that the PLUM Committee grant the appeal and reverse the approval. At a minimum, the matter should be remanded for full environmental, Coastal, and Mello review, corrected findings, and further analysis of the project's safety, circulation. Thank you for your consideration. Sincerely,
David S. Ewing

Communication from Public

Name: Stephen Lock

Date Submitted: 06/22/2026 06:04 PM

Council File No: 26-0721

Comments for Public Posting: To LA PLUM Committee, The Teague project will basically and permanently put me out of business. My studio is at the intersection of the Toledo Court "T," and would be construction- and traffic-jammed 24/7...the whole alleyway will be full of vehicles-- delivery and trash trucks, new tenants, restaurant-goers, and all the locals who live there. An impossible kglut... The Teagues seem to have no feelings at all for we existing tenants. To block up this tiny alleyway with all the traffic is unconscionable and mean-spirited, not even to mention the major loss of precious sunlight, a highlight of Venice Beach history. You must not approve this travesty of a project. Come by now and see it for yourselves. It's way too big for this locale!! Sincerely, Stephen Lock, 215 Market Street

Communication from Public

Name: Lisa Redmond

Date Submitted: 06/22/2026 07:31 PM

Council File No: 26-0721

Comments for Public Posting: Dear Chair and Members of the Planning and Land Use Management Committee, I am writing in support of the appeal of the proposed development at 1410–1422 Main Street in Venice. I am an elected Board Member of the Venice Neighborhood Council. However, the views expressed in this letter are solely my own and do not represent the official position of the Venice Neighborhood Council, its Board, or any of its committees. While I support the creation of housing and responsible development, I am concerned that the findings supporting approval of this project do not adequately address significant issues related to neighborhood compatibility, circulation, public safety, and consistency with adopted planning policies. The project raises several concerns that warrant further review:

- The project's height, massing, and intensity are substantially greater than the surrounding residential context.
- The project relies exclusively on Toledo Court, a narrow residential alley, to accommodate residential access, restaurant operations, loading activities, deliveries, trash collection, and service vehicles.
- The cumulative impacts of these activities on circulation, safety, and emergency access have not been adequately analyzed.
- The record does not clearly demonstrate consistency with adopted Venice planning policies regarding neighborhood character, scale, compatibility, and livability.
- The project has generated significant community concern and was opposed unanimously by both the Venice Neighborhood Council and its Land Use and Planning Committee. The unanimous opposition of both the Venice Neighborhood Council Board and its Land Use and Planning Committee is particularly noteworthy. These bodies include stakeholders who have devoted substantial time to reviewing project materials, hearing public testimony, evaluating the applicable planning policies, and assessing the potential impacts on the surrounding community. While unanimous opposition alone should not determine the outcome of a project, it should signal to decision-makers that serious and unresolved concerns remain regarding the adequacy of the project's findings and its compatibility with the surrounding neighborhood. I have lived in this neighborhood for more than 40 years and have observed Toledo Court function as a low-intensity residential alley serving nearby homes. It was not designed to function as the

primary access point for a mixed-use development of this scale. The proposed concentration of residential traffic, restaurant activity, loading operations, delivery vehicles, refuse collection, and service traffic raises legitimate questions regarding operational feasibility and public safety. Particularly concerning is the potential for congestion and obstruction within Toledo Court. Increased loading activity and commercial traffic could impede access for residents, including elderly individuals who rely upon the alley for daily ingress and egress. It could also create conditions that delay emergency response vehicles when rapid access is critical. Beyond the circulation issues, the project represents a substantial change in the scale and character of the immediate neighborhood. I chose to live in this area because of its small-scale residential character, and I believe the project would fundamentally alter that character without sufficient analysis of the resulting impacts. This appeal is not a rejection of housing. Rather, it is a request that the City ensure its decisions are supported by complete findings and an adequate evidentiary record. Where substantial questions remain regarding compatibility, access, safety, and consistency with adopted planning policies, further review is appropriate. For these reasons, I respectfully request that the Committee grant the appeal or, at a minimum, remand the matter for additional analysis and revised findings that fully address these unresolved concerns. Thank you for your consideration. Sincerely, Lisa Redmond Venice Resident At-Large Community Officer, Venice Neighborhood Council (Title provided for identification purposes only; opinions expressed herein are solely my own.)

Communication from Public

Name:

Date Submitted: 06/22/2026 07:40 PM

Council File No: 26-0721

Comments for Public Posting: The record does not now contain substantial evidence that the project is compatible with the surrounding historic coastal neighborhood, protects coastal visual resources, and can safely function within the constrained alley and coastal access environment, the appeal must be granted or the matter remanded for proper analysis and findings. These concerns are not theoretical. The project has generated substantial community opposition and was opposed by both the Venice Neighborhood Council Land Use and Planning Committee and the Venice Neighborhood Council Board. Residents have repeatedly expressed concerns regarding alley safety, emergency access, neighborhood compatibility, circulation impacts, and the adequacy of the environmental review. For these reasons, I respectfully request that you grant the appeal. At a minimum, I urge you to support remanding the project for additional review, revised findings, and a more thorough analysis of its conformance with the standard of review for the Coastal Act and Mello Act state laws, circulation, public safety, and neighborhood compatibility impacts. Please see further details in the attached letter.

June 21, 2026

Los Angeles City Council
Planning and Land Use Management Committee (PLUM)

RE: Council File No. 26-0721
Appeal of CPC Approval – 1410–1422 Main Street, Venice

Dear Chair and Members of the PLUM Committee:

I am writing in support of the appeal of the City Planning Commission's approval of the proposed mixed-use development at 1410–1422 Main Street in Venice and respectfully request that the approval be reversed or, alternatively, remanded for further review and corrective action.

I have spent more than a decade reviewing land use and Coastal Zone projects in Venice and throughout Los Angeles, including service on both the Venice and Coastal San Pedro Neighborhood Councils Land Use and Planning Committees and other community planning bodies. I support responsible housing production and thoughtful redevelopment. This project raises substantial unresolved issues that warrant reversal of the approval.

The City, not the Neighbors, is Responsible for Legally Adequate Findings

The findings related to the Mello Act and Coastal Zone policies are in error or are not adequately supported. The project involves the loss of existing residential housing resources within the Coastal Zone, and the required findings have not been met. The Coastal Act, Venice Land Use Plan, and Mello Act all place significant emphasis on protecting housing opportunities while ensuring that new development remains compatible with community character and public access objectives.

The Staff Response improperly attempts to shift the burden to the appellant, repeatedly faulting the appellant for not providing expert studies or technical evidence, while overlooking the City's own obligation to make legally adequate findings supported by substantial evidence. The Staff Response repeatedly faults the appellant for not providing expert studies, but that turns the law upside down. The City has the burden to make complete and accurate findings supported by substantial evidence. The issue is not whether neighbors spent thousands of dollars to hire experts to disprove the City's conclusions; the issue is whether the City's findings themselves are complete, accurate, and supported by the record. In several instances, they are not. Here, the City's findings are either missing, conclusory, or erroneous.

The most obvious example is visual compatibility: the City admits the immediate block averages only about 1.8 stories yet justifies this much larger project by pointing to large,

pre-Coastal Act buildings blocks away that are not visible from the site. That is not the “surrounding area” under Coastal Act Section 30251. This project is within the Lost Venice Canals Historic District, a highly scenic coastal resource with a much smaller prevailing scale and character. The City concludes that the project’s substantially greater height, FAR, number of stories, and overall mass are visually compatible with the surrounding area by relying on larger buildings located blocks away, including pre-Coastal Act structures that cannot even be seen from the project site. That is not a proper Coastal Act analysis. Coastal Act Section 30251 requires scenic and visual qualities of coastal areas to be protected as a resource of public importance and requires permitted development to be sited and designed to be visually compatible with the character of surrounding areas. The relevant “surrounding area” is not the entire Venice coastal zone, nor isolated larger buildings on distant commercial corridors. The relevant surrounding area is the project’s actual neighborhood context, including the Lost Venice Canals Historic District, where the project site is located and where the prevailing structures are far smaller in mass, scale, and character. The City cannot justify a dramatically out-of-scale project *within the Lost Venice Canals Historic District* by pointing to unrelated, pre-Coastal Act buildings elsewhere in Venice. The City must be consistent with its [October 1, 2020 determination by the West L.A. Area Planning Commission for a project proposed at 426-428 Grand Blvd](#) where it determined that the project being significantly larger than contributing structures in the Lost Canal Historic District, where the Contributors are one and two-stories and less than 2,000 square feet, was one of the reasons for the project’s denial. Venice’s historic architecture and character are a key part of its designation as a Special Coastal Community, which must be protected as a Coastal Resource as is documented in virtually all Coastal Commission project findings for the Venice Coastal Zone.

The project's scale, massing, and intensity **substantially** exceed the character of the surrounding neighborhood. The proposed development would introduce a level of intensity--density and activity--that is significantly different from the existing pattern of development along this portion of Main Street and the adjoining residential area. While growth is expected in Venice, it should occur in a manner that remains consistent with adopted planning policies and respects the surrounding community.

Critically, the City has violated the Density Bonus’ requirement in Government Code Section 65915(m), which states: “This section shall not be construed to supersede or in any way alter or lessen the effect or application of the California Coastal Act of 1976...” This language is not discretionary. It is the City’s obligation to assure that Coastal Resources are not harmed. Rather, the determination only includes conclusory statements saying no coastal resources are harmed but does not affirmatively show evidence of this. In fact, both the City’s and the Appellant’s evidence contradicts the City’s findings in this regard.

Plan Check is Not a Substitute for Required Discretionary Review

The Staff Response is also wrong to defer critical issues to the Building and Safety plan check process. Issues such as whether a narrow alley can safely accommodate the project's major increase in intensity of use – including residents, restaurant patrons, employees, deliveries, trash collection, loading, emergency access, pedestrians, bicycles, and rideshare activity – must be evaluated before the City approves the Coastal Development Permit, not after approval when the project is already effectively locked in. Deferring these issues to ministerial plan check deprives the public and decision-makers of the very analysis required at the discretionary stage, and it prevents meaningful conditions or project redesign before approval. The City cannot cure missing findings by promising future compliance with Building, Zoning, Fire, or LADBS requirements.

Analysis of Alley is Deficient

The City cannot defer major access and safety issues to Building and Safety plan check, because whether this narrow alley can handle the project's increased intensity of use must be analyzed before the CDP and entitlements are approved. Plan check is too late. The project relies almost entirely on Toledo Court, a narrow residential alley, for access to residential units, restaurant uses, deliveries, refuse collection, service vehicles, ride-share activity, and day-to-day operations. Toledo Court functions today as a neighborhood alley used by residents, pedestrians, bicyclists, seniors, children, pet owners, and visitors. It was never designed to accommodate the level of activity that would be generated by a project of this size and complexity.

The record does not adequately analyze how loading operations, delivery vehicles, trash collection, emergency access, ride-share activity, and resident circulation will safely function within this constrained environment. The resulting conflicts are foreseeable, yet many of these issues remain insufficiently addressed.

The State Mello Act is Violated

If the City is serious about protecting housing, it needs to start implementing the Mello Act correctly. The current ongoing violations, resulting in replacement of residential structures with mixed use commercial uses, are shameful. **This is a threshold issue. As the Mello Act has been violated, the project cannot move forward as is.**

The Staff Response to the appeal treats “net gain in dwelling units” as if that ends the Mello Act inquiry. But paragraph 4.1 of the City's Mello Act Interim Administrative Procedures asks a different threshold question: **will residential structures be demolished or converted for purposes of a non-residential use?** If yes, the City must

address whether continued residential use is feasible before approving the demolition/conversion. The Procedures summarize the core rule this way: **existing residential structures must be maintained unless the local jurisdiction finds residential use is no longer feasible**, and demolition for a non-coastal-dependent, non-residential use cannot be approved without that finding.

The Staff Response misstates the Mello Act issue by treating the project as exempt from residential-feasibility review merely because the applicant proposes to replace the two existing dwelling units with a larger mixed-use project containing residential units. That is not what the Mello Act or the City's Interim Administrative Procedures require. The threshold question is not simply whether the project produces a net increase in units; it is whether existing residential structures are being demolished or converted **for purposes of a non-residential use. A mixed-use project containing multiple restaurants and ground-floor commercial space is, at least in substantial part, a non-residential use.** Once commercial uses are introduced and the site is converted from existing residential structures into a commercial/mixed-use development, the residential use has not been "maintained" in the Mello Act sense. **The lots are being commercialized, their residential character is being displaced**, and the City cannot avoid the feasibility finding by labeling the project "mixed-use." *If that interpretation were accepted, any applicant could demolish residential structures in the Coastal Zone for a predominantly commercial project simply by retaining a token residential component. A project could be 90 percent restaurant/retail/commercial and 10 percent residential yet still claim to be "residential" so long as it includes the same number of units or a unit increase.* That would swallow the Mello Act's protection for existing coastal housing and would allow zoning and market incentives – not the statute – to determine whether residential structures are preserved.

The City's Staff Response is wrong because it collapses two separate Mello Act protections into one. The fact that the project may result in a net increase in dwelling units does not answer whether the existing residential structures are being demolished **for purposes of a non-residential use.** The Mello Act is not satisfied merely by counting units at the end of the project. Its first protection is preservation: existing residential structures in the Coastal Zone are to be maintained unless the City first finds, based on substantial evidence, that residential use is no longer feasible at that location. Here, the applicant is not replacing residential structures with a purely residential project. The applicant is replacing them with a mixed-use commercial development that includes restaurants and other non-residential components. That is a conversion of residential land and structures to a non-residential or partially non-residential use, and it triggers the feasibility analysis. The City cannot rely on the commercial zoning of the site to avoid this requirement, because the Mello Act protects existing residential structures and affordable housing in the Coastal Zone regardless of whether the underlying zoning also allows commercial uses. Otherwise, the Mello Act's preservation rule

would be meaningless in commercial zones, where residential structures are often most vulnerable to demolition and conversion.

Lastly, the project cannot be treated as residential because the certified Land Use Plan and the Venice Coastal Zone Specific Plan have different development standards and policies for Mixed Use (commercial) than for Residential. **The City's convenient but erroneous interpretation that demolition of a residential structure for purposes of a mixed use project is allowed under the Mello Act incentivizes displacement of existing residents,** an unacceptable result that is contrary to the intent of the Mello Act.

Before approving demolition of the existing residential structures, the City must make the required Mello Act finding that continued residential use is no longer feasible; because it failed to do so, **the approval is legally incomplete, and the appeal should be granted or the matter remanded for a proper Mello Act Review determination.**

Conclusion

As the record does not now contain substantial evidence that the project is compatible with the surrounding historic coastal neighborhood, protects coastal visual resources, and can safely function within the constrained alley and coastal access environment, the appeal must be granted or the matter remanded for proper analysis and findings.

These concerns are not theoretical. The project has generated substantial community opposition and was opposed by both the Venice Neighborhood Council Land Use and Planning Committee and the Venice Neighborhood Council Board. Residents have repeatedly expressed concerns regarding alley safety, emergency access, neighborhood compatibility, circulation impacts, and the adequacy of the environmental review.

For these reasons, I respectfully request that you grant the appeal. At a minimum, I urge you to support remanding the project for additional review, revised findings, and a more thorough analysis of its conformance with the standard of review for the Coastal Act and Mello Act state laws, circulation, public safety, and neighborhood compatibility impacts.

Thank you for your consideration of this matter.

Sincerely,

Robin Rudisill

Communication from Public

Name: Appellant
Date Submitted: 06/22/2026 09:21 PM
Council File No: 26-0721
Comments for Public Posting: Good afternoon, Commissioners. Please see my attached comments. Best regards, Rick Garvey 234 Horizon #5 Venice, CA 90291

Good afternoon, Commissioners.

My name is Rick Garvey, and as the appellant, I respectfully urge this Committee to grant the appeal and reverse the City Planning Commission's approval.

I've lived directly behind this property for over 30 years. I know this alley, this block, and this coastal neighborhood intimately. What I'm presenting today is not neighborhood opposition to change — it is a legal record that demonstrates this approval cannot stand.

This approval is defective on three independent grounds. Any one of them alone would warrant reversal. Together, they demand it.

First: The CEQA Analysis Is Fatally Incomplete.

The City concluded no traffic study was required because the project generates approximately 86 daily vehicle trips. That number is wrong — not due to a counting error, but because the City deliberately excluded the project's 3,700 square feet of restaurant space from the calculation entirely.

Restaurants generate significant vehicle trips, particularly during evenings and weekends on a high-traffic coastal corridor. When those trips are properly included, the project exceeds the 250-trip threshold that triggers a mandatory traffic study.

The City says I failed to commission expert studies. I did not have the resources to do so. But under CEQA's fair argument standard, I don't have to. And much of the evidence I am relying on comes from the City's own documents.

The California Supreme Court held in *Bozung v. LAFCO* that you cannot fragment a project to avoid environmental review. The City did exactly that.

Beyond traffic: this project nearly doubles the allowable floor-area ratio, increases height by over 70%, dramatically reduces parking, and sits inside the environmentally sensitive Coastal Zone. These are textbook unusual circumstances that bar the use of a categorical exemption. An Initial Study was required. The City skipped it entirely.

The City also failed to analyze cumulative impacts. This is a constrained coastal environment with documented capacity limitations. CEQA requires that analysis. The record is silent on it.

Second: The Project Violates the Coastal Act — and the City's Own Findings Are Internally Inconsistent.

The surrounding neighborhood averages 1.8 stories and 21.9 feet. This project is five stories and nearly 53 feet — more than double the neighborhood average. Coastal Act Section 30251 requires visual compatibility with the surrounding area, and the Venice Land Use Plan reinforces that standard. The City's compatibility finding points to a handful of outlier buildings built before the Coastal Act, including several built over 100 years ago. That is not substantial evidence.

On parking: the project carries a 90-space deficit. The City's response is that transit and bike share exist nearby. Coastal Act Section 30252 requires adequate parking or a substitute means — not an assumption about transit behavior. Parking spillover onto public streets directly impairs coastal access for beach visitors.

On alley safety: all vehicular access — residential, restaurant deliveries, waste hauling, and emergency vehicles — funnels through a single narrow alley. The City's response defers this to plan check. That is not a CEQA analysis. That is a deferral. A five-story mixed-use project generating residential and restaurant traffic through an unanalyzed, misidentified alley is not a minor oversight — it is a public safety question CEQA was designed to require the City to answer.

Here is the core legal defect: Government Code Section 65915(m) is explicit that Density Bonus law does not supersede the Coastal Act. The City was required to harmonize both. Instead, it used Density Bonus eligibility as a blanket override of Coastal Act protections — and then issued Coastal Act findings it couldn't actually support. Those findings are not just weak. They are internally inconsistent with the City's own Density Bonus rationale.

Third: The Record Is Demonstrably Wrong — and It Infects Every Finding.

The determination states that 1410 Main Street has been a vacant lot since 2018. It was not. Drone photographs in the record prove it was actively used as live/work space with shipping containers as late as 2021. This misrepresentation directly corrupts the Mello Act analysis — which the City is required to perform before approving any residential demolition or conversion in the Coastal Zone. If the baseline facts are wrong, the Mello Act findings are legally insufficient.

The determination also misidentifies the alley behind the property as "unnamed." It has a street sign. It is called Toledo Court. The City failed to analyze the real safety impacts of routing construction and residential traffic through that alley. The record treats it as a non-issue because it could not accurately identify it.

The determination misidentifies the buildings immediately to the north — calling them one-story single-family homes. They are a three-story apartment building and a two-story fourplex. It also places the Marina Freeway 1.5 miles away when it is 2.4 miles by any map.

These are not typos. They reveal a record that was not carefully reviewed and findings that cannot be trusted.

Conclusion

This approval rests on a CEQA analysis that excluded the project's restaurant uses to avoid a traffic study; Coastal Act findings unsupported by substantial evidence and internally inconsistent with the City's own Density Bonus rationale; and a Mello Act analysis built on a false factual baseline.

This Committee has an obligation to the residents of Venice and to the integrity of the coastal review process.

Grant this appeal. Reverse the approval. Remand for full CEQA review and reconsideration consistent with the Coastal Act, the Venice Land Use Plan, and the Mello Act.

Thank you for your time.
