APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: _____

Reviewed & Accepted by (DSC Planner): _____

Receipt No.: _____ **Date:** _____

☐ Determination authority notified ☐ Receipt Number: _____

PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals use form CP13-7840. For Building and Safety Appeals and Housing Department Appeals, use form CP13-7854.

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

☐ Area Planning Commission (APC) ☐ City Planning Commission (CPC) ☑ City Council

☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

APN: 4238-012-003, 4238-012-004, 4238-012-005

Project Address: 1410-1422 South Main Street, Venice, CA 90291

Final Date to Appeal: 5/5/2026

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☑ **Entire** ☐ **Part**

Are specific Conditions of Approval being appealed? ☐ YES ☑ NO

If Yes, list the Condition Number(s) here: _____

On a separate sheet provide the following:

- ☑ Reason(s) for the appeal
- ☑ Specific points at issue
- ☑ How you are aggrieved by the decision

APPELLANT

Check all that apply.

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☐ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Richard Garvey

Company/Organization: _____

Mailing Address: 234 Horizon Avenue #5

City: Venice **State:** CA **Zip Code:** 90291

Telephone: 310-721-1647 **E-mail:** rickgarvey@hotmail.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☑ Self ☐ Other: _____

Is the appeal being filed to support the original applicant's position? ☐ YES ☑ NO

REPRESENTATIVE / AGENT INFORMATION

Name: _____

Company/Organization: _____

Mailing Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Telephone: _____ **E-mail:** _____

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: Richard Garvey **Date:** 5/4/2026

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

GENERAL APPEAL FILING REQUIREMENTS

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.	QR Code to Online Appeal Filing

IN PERSON APPEAL FILINGS

Drop off at DSC: Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check.

a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications.

b. Alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa Street 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org
South LA DSC *Tuesday and Thursday Only*	8475 S. Vermont Avenue, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- ☐ Appeal Application
- ☐ Justification/Reason for Appeal
- ☐ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

- ☐ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable, or a fee

equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.

☑ *Aggrieved Party. The fee charged shall be in accordance with LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.*

4. Noticing Requirements (Applicant Appeals Only)

☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

SPECIFIC CASE TYPES
ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 13B.2.5. (Director Determination) of Chapter 1A or LAMC Section 13B.2.3. (Class 3 Conditional Use) of Chapter 1A as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.
    - ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I of Chapter 1 or LAMC Section 10.1.10. (Waiver and Appeals) of Chapter 1A as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 13B.7.3.G. of Chapter 1A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 13B.6.2.G. of Chapter 1A. Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

- ☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable.

  For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) of Chapter 1 shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.

Applicant Copy
Office: Van Nuys
Application Invoice No: 108729

68001108729

City of Los Angeles
Department of City Planning

City Planning Request

NOTICE: The staff of the Planning Department will analyze your request and accord the same full and impartial consideration to your application, regardless of whether or not you obtain the services of anyone to represent you.

This filing fee is required by Chapter 1, Article 9, L.A.M.C.

If you have questions about this invoice, please contact the planner assigned to this case. To identify the assigned planner, please the assigned planner, please visit https://planning.lacity.gov/pdiscaseinfo/ and enter the Case Number.

Payment Info: $281.67 was paid on 05/05/2026 with receipt number 200604526825

Applicant: Richard Garvey
Representative:
Project Address: 1410 S MAIN ST, 90291

NOTES: Appeal by an aggrieved party of the entire decision.

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA-1A			
Item	Fee	%	Charged Fee
Appeal by Person Other Than The Applicant	$229.00	100 %	$229.00
		Case Total	**$229.00**
		* Fees Subject to Surcharges	$229.00
		Fees Not Subject to Surcharges	$0.00
		Plan & Land Use Fees Total	$0.00
		Expediting Fee	$0.00
		Development Services Center Surcharge (3%)	$6.87
		City Planning Systems Development Surcharge (6%)	$13.74
		Operating Surcharge (7%)	$16.03
		General Plan Maintenance Surcharge (7%)	$16.03

* Fees Subject to Surcharges	$229.00
Fees Not Subject to Surcharges	$0.00
Plan & Land Use Fees Total	$0.00
Expediting Fee	$0.00
Development Services Center Surcharge (3%)	$6.87
City Planning Systems Dev. Surcharge (6%)	$13.74
Operating Surcharge (7%)	$16.03
General Plan Maintenance Surcharge (7%)	$16.03
Grand Total	$281.67
Total Overpayment Amount	$0.00
Total Paid (amount must equal sum of all checks)	$281.67

Council District:
Plan Area:
Processed by STEVEN WECHSLER on 5/5/2026

Signature: _____

LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: APRIL 20, 2026

Case No.: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA Council District: 11 – Park
CEQA: ENV-2021-2021-CE
Plan Area: Venice

Project Site: 1410 – 1422 South Main Street

Applicant: Three on the Tree LLC, Brittany Teagues
Representative: Tony Russo, Crest Real Estate

At its meeting **March 12, 2026**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

Demolition of two single-family dwellings, and the construction of a 26,889 square-foot, five story, mixed-use building consisting of 20 residential units, of which four residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level-subterranean garage; and a roof deck with a solar trellis and a roof access structure, providing 28 parking spaces.

1. **Determined**, based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Sections 15301 and 15332 and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approved**, pursuant to Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC), a Density Bonus/Affordable Housing Incentive Compliance Review for a Housing Development Project comprised of 20 dwelling units, of which four dwelling units will be set aside for Very Low Income Households, with the following Off-Menu Incentives and Waivers of Development Standards:
   a. An Off-Menu Incentive to allow a Floor Area Ratio (FAR) increase of 97.3 percent resulting in a FAR of 2.96, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3;
   b. An Off-Menu Incentive to allow a northwesterly side yard of five feet in lieu of eight feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;
   c. An Off-Menu Incentive to allow a southeasterly side yard of 5 feet in lieu of eight feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;
   d. An Off-Menu Incentive to allow a zero-foot front yard setback for residential floor area, in lieu of five feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a);
   e. A Waiver of Development Standards to allow a maximum building height of 52 feet 10 inches, in lieu of 30 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3;
   f. A Waiver of Development Standards to remove the step back provisions, in lieu a 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F(3)(a); and

g. A Waiver of Development Standards to allow a Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C;

3. **Approved**, pursuant to LAMC Chapter 1A Section 13B.9.1, a Coastal Development Permit for the Proposed Project on a lot located within the Single Permit Jurisdiction of the Coastal Zone;
4. **Approved**, pursuant to LAMC Chapter 1A Section 13B.4.2, a Project Compliance for the Proposed Project on a lot located within the North Venice Subarea of the Venice Coastal Zone Specific Plan;
5. **Approved**, 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 the demolition of two residential units and the construction of 20 Residential Units in the Coastal Zone;
6. **Adopted** the attached Conditions of Approval; and
7. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Zamora
Second: Saitman
Ayes: Chavez, Choe, Diaz, Johnson, Klein, Lawshe, Rosenstein

Vote: 9 – 0

_____
Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

APPEAL PERIOD - EFFECTIVE DATE

The decision of the Los Angeles City Planning Commission as it relates to the Density Bonus Off-Menu Incentives and Waivers of Development Standards are not further appealable. The remaining entitlements are appealable to City Council within **15 days** after the mailing date of this determination letter. Any appeal not filed within the 15-day period shall not be considered by the Council.

Appeal of Coastal Development Permit. The proposed development is in the Single Permit Jurisdiction Area of the Coastal Zone. Pursuant to LAMC Section 13B.9.1.G.1.f., no fee shall be charged for appeals of a Coastal Development Permit.

Provided no appeal has been filed by the noted date, a copy of the permit will be sent to the California Coastal Commission, pursuant to Section 13B.9.1.D.4 of Chapter 1A of the Los Angeles Municipal Code. Unless an appeal is filed with the California Coastal Commission before 20 working days have expired from the date the City's determination is deemed received by such Commission, the City's action shall be deemed final. As further stipulated in California Code of Regulations Section 13313, the permit shall not become effective until the requirements of Public Resources Code (PRC) Section 30601 have been fulfilled.

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 13B.9.1.I.2 of Chapter 1A of the Los Angeles Municipal Code, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

FINAL APPEAL DATE: MAY 5, 2026

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

HOW TO FILE AN APPEAL

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below:

Forms are available online at http://planning.lacity.gov/development-services/forms.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

QR Code to Online Appeal Filing

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely online. Appeal fees may be paid for by credit card or e-check.

IN PERSON APPEAL FILINGS

QR Code to Forms for In-Person Appeal Filing

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays only, and payment can be made by credit card or check.

a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications;
b. Alternatively, appeal applications can be filed with staff at DSC public counters.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa St 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Blvd Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org

South LA DSC *Tuesday and* *Thursday Only*	8475 S. Vermont Ave, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

DETERMINATION EFFECTIVE DATE

This determination will become effective after the end of the appeal period date on the first page of this document unless an appeal is filed with the Department of City Planning.

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).

SCHEDULING CASE CONDITION CLEARANCE AND BUILDING PERMIT SIGN-OFFS

QR Code to BuildLA Appointment Portal for Condition Clearance

In order to clear conditions and/or obtain building permit sign-offs, you must make an appointment with the Department of City Planning's Development Services Center (DSC). You may schedule a Case Condition Clearance Appointment with the DSC at appointments.lacity.org after the effective date of the determination..

See instructions on how to prepare for your appointment at planning.lacity.gov/project-review/case-filings

Attachments: Conditions of Approval, Amended Findings

cc: Juliet Oh, Senior City Planner
Ira Brown, City Planner
Sienna Kuo, Assistant Planner

CONDITIONS OF APPROVAL

Density Bonus Conditions

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped Exhibit "A" attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.

2. **Residential Density.** The project shall be limited to a maximum density of 20 dwelling units, including On-Site Restricted Affordable Units.

3. **On-site Restricted Affordable Units.** Four (4) units shall be reserved for Very Low Income Household Occupancy as defined by the State Density Bonus Law per Government Code Section 65915 and by the Los Angeles Housing Department (LAHD). In the event the RPO Replacement Unit condition requires additional affordable units or more restrictive affordability levels; the most restrictive requirements shall prevail.

4. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Sections 12.22 A.25 and State Density Bonus Law (Government Code Section 65915).

5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to make four (4) units available to Very Low-Income Households or equal to 16 percent of the project's total base residential density allowed, for sale or rental, as determined to be affordable to such households by LAHD for a period of 99 years. In the event the applicant reduces the proposed density of the project, the number of required reserved on-site Restricted Units may be adjusted, consistent with LAMC Section 12.22 A.37, to the satisfaction of LAHD, and in consideration of the project's Replacement Unit Determination. Enforcement of the terms of said covenant shall be the responsibility of LAHD. The applicant shall present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the LAHD.

   Unless otherwise required by state or federal law, the project shall provide an onsite building manager's unit, which the owner shall designate in the covenant. The Owner may not use an affordable restricted unit for the manager's unit.

6. **Rent Stabilization Ordinance (RSO).** Prior to the issuance of a Certificate of Occupancy, the owner shall obtain approval from LAHD regarding replacement of affordable units, provision of RSO Units, and qualification for the Exemption from the Rent Stabilization Ordinance with Replacement Affordable Units in compliance with Ordinance No. 184,873. In order for all the new units to be exempt from the Rent Stabilization Ordinance, the applicant will need to either replace all withdrawn RSO units with affordable units on a one-for-one basis or provide at least 20 percent of the total number of newly constructed rental units as affordable, whichever

results in the greater number. The executed and recorded covenant and agreement submitted and approved by LAHD shall be provided.

7. **Floor Area Ratio (Off-Menu Incentive).** The project is allowed a maximum FAR of 2.96.

8. **Side Yard Setback – Northwesterly (Off-Menu Incentive).** The project is allowed a minimum northwesterly side yard setback of 5 feet.

9. **Side Yard Setback – Southeasterly (Off-Menu Incentive).** The project is allowed a minimum southeasterly side yard setback of 5 feet.

10. **Front Yard Setback – Residential (Off-Menu Incentive**). The project is allowed a zero-foot front yard setback for residential floor area.

11. **Height (Waiver)** – The building shall not exceed a maximum Flat Roof height of 52 feet,10 inches as measured from the midpoint of the centerline of Main Street to the highest point of the roof.

12. **Step-Back (Waiver) –** The front 45-degree step back plane is removed.

13. **Roof Access Structure (Waiver)** – The building is allowed a Roof Access Structure with a maximum exterior dimension of 176 square feet.

14. **Parking and Access**. As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide 28 parking spaces onsite; all vehicle access shall be provided from the rear alley.

    a. Residential Parking – 24 parking spaces shall be provided for the residential units.

    b. Commercial Parking - 4 parking spaces shall be provided for the commercial uses.

15. **Parking Per AB 2097.** The project shall be permitted to provide a minimum of zero automobile parking spaces pursuant to AB 2097. Twenty-eight automobile parking spaces are provided.

16. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC Section 12.21 A.16. As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide 45 bicycle spaces onsite.

17. **Adjustment of Parking**. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including the Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.

18. **Electric Vehicle Parking.** All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC. Any parking spaces provided

above LAMC requirements shall be provided with EV chargers to immediately accommodate electric vehicles within the parking areas.

Coastal Development Permit Conditions

19. **Single Permit Jurisdiction Area.** The project is located within the Single Permit Jurisdiction area of the California Coastal Zone. Pursuant to LAMC Section 13B.9.1.D.4, the decision of the permit granting authority, or any appeal body to approve issuance of a permit shall not be deemed to be final and no Coastal Development Permit may be issued until 20 working days have expired from the date said notice of permit issuance is deemed received by said Executive Director and without an appeal having been taken to the Coastal Commission. Prior to the issuance of any permits, the applicant shall provide a copy of the Coastal Commission's Notification that the City's coastal development permit is effective.

20. **Front Façade (Articulation).** The front façade of the structure shall be articulated as shown in "Exhibit A."

21. **Commercial Floor Area.** The project shall be limited to 656 square feet of office use and 3,676 square feet of restaurant uses providing 2,098 square feet of Service Floor area and 467 square feet of outdoor Service Floor area.

22. **Street Wall.** The project shall provide the required Street Wall for the portions of the structure fronting Main Street. The Street wall shall extend for at least 65 percent of the length of the Building Frontage, be set back zero feet from the building line, and maintain a minimum height of 13 feet, as shown on Exhibit A.

23. **Ground Floor.** At least 50 percent of the area of the Ground Floor Street Wall of the Project shall be devoted to pedestrian entrances, display windows or windows offering views into restaurant or lobby space, as shown on Exhibit A.

24. **Roof Structures.** Chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the height limit by a maximum of five feet.

Additional Entitlement Conditions.

25. **Street Trees.** Street trees shall be provided to the satisfaction of the Urban Forestry Division. Street trees may be used to satisfy on-site tree requirements pursuant to LAMC Article Section 12.21.G.3 (Chapter 1, Open Space Requirement for Six or More Residential Units).

    Required Trees per 12.21 G.2. As conditioned herein, a final submitted landscape plan shall be reviewed to be in substantial conformance with Exhibit "A." There shall be a minimum of four (4) 24-inch box, or larger, trees on site pursuant to LAMC Section 12.21 G.2. Any required trees pursuant to LAMC Section 12.21 G.2 shown in the public right-of-way in Exhibit "A" shall be preliminarily reviewed and approved by the Urban Forestry Division prior to building permit issuance. In-lieu fees pursuant to LAMC Section 62.177 shall be paid if placement of required trees in the public right-of-way is proven to be infeasible due to City determined physical constraints.

26. **Landscape Plan.** Revised landscape plans shall be submitted to show the size and location of all plants. The landscape plan shall indicate landscape points for the Project as required by

Los Angeles Municipal Code (LAMC) 12.40 and Landscape Ordinance Guidelines "O". All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be landscaped, including an automatic irrigation system, and maintained in accordance with a final landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning. The final landscape plan shall be in substantial conformance with the submitted Landscape Plan, Exhibit "A," and shall incorporate any modifications required as a result of this grant.

27. **Stormwater/irrigation** – The project shall implement on-site stormwater infiltration as feasible based on the site soils conditions, the geotechnical recommendations, and the City of Los Angeles Department of Building and Safety Guidelines for Storm Water Infiltration. If on-site infiltration is deemed infeasible, the project shall analyze the potential for stormwater capture and reuse for irrigation purposes based on the City Low Impact Development (LID) guidelines.

28. **Solar**. The Project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

29. **Solar and Electric Generator.** Generators used during the construction process shall be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.

30. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, Environmental Sensitive Areas, the public right-of-way, nor from the above.

31. **Trash.** Separate trash collection areas for residential and commercial trash collection shall be maintained and shall also accommodate the separate collection of recyclable trash. The separate trash collection areas shall be clearly identified on final plans submitted for review and sign-off.

32. **Graffiti**. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

Administrative Conditions

33. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building & Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building & Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building & Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

34. **Notations on Plans.** Plans submitted to the Department of Building & Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

35. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

36. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

37. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety for purposes of having a building permit issued at any time during the term of this grant.

38. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

39. **Department of Building & Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building & Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building & Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

40. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

41. **Expiration**. In the event that this grant is not utilized within three years of its effective date (the day following the last day that an appeal may be filed), the grant shall be considered null and void. Issuance of a building permit, and the initiation of, and diligent continuation of, construction activity shall constitute utilization for the purposes of this grant.

42. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

(As Amended by the City Planning Commission at its meeting on March 12, 2026)

Entitlement Findings

Density Bonus/Affordable Housing Incentives Compliance Findings

1. **Pursuant to Government Code Section 65915 and LAMC Section 12.22 A.37, the Commission shall approve a density bonus and requested incentive(s)/waiver(s) unless the Commission finds that:**

   a. **The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c).**

   The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested incentives do not result in identifiable and actual cost reduction to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low-, low-, and moderate-income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

   Based on the set-aside of 16 percent of 20 base units for Very Low Income and Low Income Households, the applicant is entitled to four (4) Incentives under both Government Code Section 65915 and the Los Angeles Municipal Code (LAMC). The request for an increase in Floor Area Ratio (FAR), decrease in northwesterly and southeasterly side yard setbacks, and decrease in residential front yard setback qualify as requested incentives. The remaining requests allow an increase in the allowable height, removal of front façade step back provisions, and the increase in allowable square footage of the Roof Access Structure are Waivers of Development Standards.

   Floor Area Ratio (Off-Menu Incentive) – An Off- Menu Incentive to allow a FAR of 2.96:1 in lieu of a FAR of 1.5:1, as otherwise required by the Venice Coastal Zone Specific Plan 11.B.3. Commercially zoned lots within the Venice Coastal Zone Specific Plan are allowed a FAR equal to 1.5 square feet of building floor area to each (1) square foot of buildable lot area for mixed use buildings.

   Should the project adhere to the allowable FAR in the C2-1 zone, its total square footage would be limited to 13,635 square feet. The Off-Menu Incentive to increase the FAR by 97.3 percent would allow an increase of 13,254 square feet for a total of 26,889 square feet, which would accommodate a larger construction envelope to provide additional affordable units and additional market rate units. The ability to develop larger building or more units will increase the revenues from the market-rate floor area, which will lower the marginal cost of developing and operating the affordable units. The requested incentive allows the developer to expand the building envelope so that additional units can be

constructed, and the overall space dedicated to residential uses is increased. These Incentives support the Applicant's decision to provide four (4) affordable units for Very Low-Income Households.

Side Yard Setback – Northwesterly (Off-Menu Incentive). An Off-Menu Incentive to allow a reduced northwesterly side yard setback of 5 feet in lieu of the required 8-foot side yard setback, as otherwise required in the C2 Zone pursuant to LAMC Section 12.11.C.2. Off-Menu incentives are permitted a 37.5 percent reduction in the north-westerly side yard setback.

The applicant requests a reduction of three feet in northwesterly side yard to allow for efficient floor plates that maintain adequate light, air, and privacy through upper-level plane breaks and façade articulation, while avoiding structural inefficiencies that would increase cost and reduce the number of feasible residential units, including a potential impact to the very low-income units.

Side Yard Setback – Southeasterly (Off-Menu Incentive). An Off-Menu Incentive to allow a reduced southeasterly side yard setback of 5 feet in lieu of the required 8-foot side yard setback, as otherwise required in the C2 Zone pursuant to LAMC Section 12.11.C.2. Off-Menu incentives are permitted a 37.5 percent reduction in the north-westerly side yard setback.

The applicant requests a reduction of three feet in northwesterly side yard to allow for efficient floor plates that maintain adequate light, air, and privacy through upper-level plane breaks and façade articulation, while avoiding structural inefficiencies that would increase cost and reduce the number of feasible residential units, including a potential impact to the very low-income units.

Front Yard Setback (Off-Menu Incentive). An Off-Menu Incentives to allow a 100% decrease in front yard setback for residential floor area to allow 0 foot, 0 inch, in lieu of the required 5 feet as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.4.

Residential portions of a mixed-use structure are required to adhere to LAMC requirements, however, no less than 5 feet according to the Venice Coastal Zone-Specific Plan. Removal of the front yard setback will allow for the structure to align with the established street wall and reinforce pedestrian orientation and façade articulation along Main Street without compromising the size of residential units. The project proposes providing 20 residential units, including four (4) Very Low Income affordable units. The additional square footage permitted by the reduction of the front yard setback decreases the marginal costs of providing the units reserved for Very Low Income households. If the building were to adhere strictly to the 5-foot front yard setback requirement in the C2-1-O Zone, the project would be limited in the size and/or number of units the project could provide, undermining the project's financial feasibility by increasing the marginal costs of providing the units reserved for Very Low Income households. The requested incentive will allow the developer to expand the building envelope so the additional units can be constructed and the overall space dedicated for residential uses increased.

b. The Incentive will have a Specific Adverse Impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the

Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec. 65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

As such, the project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed incentive(s) will have a specific adverse impact on public health and safety.

c. The incentives are contrary to state or federal law.

There is no substantial evidence in the record that the requested incentives are contrary to state or federal law.

2. Pursuant to Government Code Section 65915 and LAMC Section 12.22 A.37, the Commission shall approve a density bonus and requested waiver(s) unless the Commission finds that:

a. The Development Standard associated with a request for a Waiver will not have the effect of physically precluding the construction of a development meeting the eligibility criteria described in Paragraph (c) at the densities or with the Base Incentives and Additional Incentives permitted under this subdivision.

A project that meets the requirements of Government Code 65915 may request other "waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]" (Government Code Section 65915(e)(1)).

Therefore, the request for the following is recommended as Waivers of Development Standards. Without the below Waivers, the existing development standards would physically preclude development of the base units, build out of the incentives, and project amenities:

Height (Waiver) – A waiver to allow a 76.1 percent increase in total building height from the permitted 30 feet to 52 feet, 10 inches as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.a.

The project site is zoned C2-1-O with a Height District of 1, which provides for unlimited building height. However, the Venice Coastal Zone Specific Plan for the North Venice Subarea further limits building height to 30 feet for flat rooflines and 35 feet for varied rooflines. The proposed structure is functionally a four-story mixed-use structure, however due to the nature of the proposed solar trellis, the solar trellis functions as an additional floor. Compliance with the height limitations of the Specific Plan would reduce the solar trellis height and rooftop amenity dedicated to residential use. As such, the Off-Menu Incentive for increased height is necessary to accommodate a larger construction envelope to provide for the affordable units and market rate units. As with FAR, the ability to develop a larger building with more units will increase revenues from the market-rate units, which will lower marginal cost of developing and operating the affordable units, thereby making the project financially feasible. The requested incentive allows the developer to expand the building envelope so that the additional units can be constructed, solar trellis to abide by the Green Code, and increase the overall space dedicated to residential use.

Step Back Provisions (Waiver) – A Waiver to allow the removal of the step-back-provisions, in lieu of the 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

The required step back provisions would reduce the square footage and private open space provided for each unit. Compliance with the step-back requirement would substantially reduce the floor area and livable space for the residential portion of the mixed use structure, as proposed. Without the waiver, the applicant would be physically precluded from constructing some portion of the residential units. The requested waiver will allow the developer to expand the building envelope so the units can be constructed, and the overall space dedicated to residential use is increased.

Roof Access Structure (Waiver) – A Waiver to increase the maximum exterior dimension to 176 square feet in lieu of 100 square feet as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

The maximum permitted RAS of 100 square feet as measured from the exterior walls is typically permissible for a standalone residential structure, however, mixed use or multi-family structures require additional space for stair and elevator access. The Los Angeles Fire Department egress requirements and ADA accessibility to the rooftop amenities for all residents, including those with disabilities requires additional mechanical equipment and therefore, a larger roof access structure to accommodate.

b. The Waiver would have a Specific Adverse Impact as defined in California Government Code Section 65589.5(d)(2), upon public health and safety and for which there is no feasible method to satisfactorily mitigate or avoid the Specific, Adverse Impact. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec. 65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.

The project is not located on a substandard street in a Hillside area, Very High Fire Hazard Severity Zone, or any other special hazard area. Therefore, there is no substantial evidence that the proposed project and requested waivers would have a specific adverse impact on public health and safety.

c. The Waiver would have an adverse impact on any real property that is listed in the California Register of Historical Resources.

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

As such, the project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed waivers will have an adverse impact on public health and safety.

d. The Waiver would be contrary to state or federal law.

There is no substantial evidence in the record indicating that the requested waivers are contrary to any state or federal law.

3. Coastal Development Permit Findings

a. The development is in conformity with Chapter 3 of the California Coastal Act of 1976.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Venice Specific Plan, as follows:

- The increase allowable FAR to 2.96:1 in lieu of 1.5:1,
- The removal of the 5-foot residential front yard setback in lieu of 5 feet,
- The increase building height to 52 feet, 10 inches in lieu of 30 feet,

- The remove the step back provisions in lieu of a 45 degree step back plane break, and
- The increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet.

In addition, the proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the LAMC, as follows:

- Reduce the northwesterly side yard to allow 5 feet in lieu of 8 feet,
- Reduce the southeasterly side yard to allow 5 feet in lieu of 8 feet.

As discussed in Finding No. 1, the proposed Density Bonus project meets the requirements of Density Bonus State Law to be eligible for the density bonus, incentives, and waivers of development standards. In addition, the proposed development must also comply with the requirements of the Coastal Act. As provided in the findings below, the proposed development complies with the applicable policies of the Coastal Act and the Venice LUP.

Chapter 3 of the Coastal Act includes provisions that address the impact of development on public services, infrastructure, traffic, the environment and significant resources, and coastal access. Applicable provision are as follows:

Article 2 Public Access

Section 30211 Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) It is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) Adequate access exists nearby, or, (3) Agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The property is located within 250 feet from a Major Transit Stop at Main Street

and Market Street. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The project site is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone. Therefore, the proposed project will not interfere with or obstruct the public's right to access to coastal resources.

As such, the project conforms to the applicable Public Access policies of Chapter 3.

Article 5 Land Resources

Section 30240 requires the protection of environmentally sensitive habitat areas and to prevent significant impacts on such areas.

Section 30244 Archaeological and Paleontological Resources.
Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project includes a subterranean garage and will include the removal of 9,850 cubic yards of dirt.

Further, the project site is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of various types of land uses and the area is not located in an area identified to contain paleontological or archaeological resources. Any archaeological resources that may have existed near the project site surface are likely to have been disturbed or previously removed. However, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during project grading activities. If previously unknown archaeological resources are found during excavation and grading, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. If archaeological or paleontological resources are discovered during grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

Further, the project site is not identified in the Venice Land Use Plan as a site located within or adjacent to an Environmentally Sensitive Habitat Area (ESHA). The proposed development would be fully developed within the boundaries of the private lots and would not impact sensitive habitat areas. As such, the project conforms to the applicable Land Resources policies of Chapter 3.

Article 6 Development
Section 30250 Location; existing developed area.

(a) 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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

The project is located in an existing developed area surrounded by similar residential and commercial uses and will not have a significant adverse impact on coastal resources. Existing infrastructure servicing the existing residences will be used by the proposed development. Utility lines and water pipes will be connected to the proposed development. In addition, the project area is within the service area of the Los Angeles Fire Department Station 63 and the Pacific Division of the Los Angeles Police Department. Primary regional access is provided by the Marina Freeway, Venice Boulevard, and Lincoln Boulevard, which are all accessible within 1.5 miles of the Project Site.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish

an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources.

Section 30251 Scenic and Visual Qualities.
The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The architectural character of nearby development includes an eclectic mix of architectural styles including modern and contemporary style buildings. The project's proposed contemporary design fits into the architectural diversity of the neighborhood. The project height, massing and scale of the project is consistent with existing buildings along Main Street. As discussed above, the project would increase the maximum density for the subject site from six dwelling units to 20 dwelling units. The project would increase the maximum building envelope with a height increase of 22 feet and 10 inches, reduction in the residential front yard setback from 5 feet to 0 feet, reduction in the side yards from 8 feet to 5 feet, and increasing the FAR from 1.5:1 to 2.96:1. The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures

nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. Furthermore, the proposed increase in density is consistent with higher density permitted in the underlying adjacent multi-family residential zone and fits within a building envelope that is compatible with the surrounding area. The increase in density and provision of affordable housing in the Coastal Zone is consistent with the California Coastal Commission's policies for increasing housing and affordable housing in the Coastal Zone.

The project's consistency with development standards in the certified Venice LUP is important in assessing the project's compatibility with the character of the surrounding area. The certified Venice LUP states that the development standards also define for each land use designation a density of housing units and lot coverage to maintain the scale and character of existing residential neighborhoods and minimize the impacts of building bulk and mass." (LUP, p.II-2.)

The proposed development complies with Policy I.A.13 (Density Bonus Application) which allows for reduced restrictions for density, height and setback standards as outlined in Policies I.A.1, I.A.8, I.E.1, I.E.2, I.E.3 and II.A.3 of the Venice Land Use Plan (LUP), further discussed in Finding No. 3.b. As such, the proposed development is visually compatible with the character of the surrounding area and will further enhance the visual quality of the area.

Section 30252 Maintenance and Enhancement of Public Access.
The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that

the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions.

The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street and within 300 feet from the Windward Circle, a Major Transit stop within Venice. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants. The surrounding area is served by Big Blue Bus Route 1 located at the intersection of Main Street and Market Street, Culver City Bus Route No. 1 located at the intersection of Windward Avenue and Main Street, Los Angeles County Metropolitan Transit Authority (Metro) bus line 33 at the intersection of Main Street and Grand Boulevard.

Although the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. As demonstrated in the Parking Demand Management Assessment provided, empirical surveys demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

The proposed project is not located between the first public road and the sea and is located more than a half of a mile from the beach. The proposed project will not interfere with or obstruct the public's right to access to coastal resources. The proposed development will not have any adverse impacts on public access to the coast. No permanent structures will be placed within the public right-of-way and public access to the coast will not be obstructed. The proposed project will neither interfere nor reduce access to the shoreline as the site does not have direct access to any water or beach. As demonstrated in the

Parking Demand Management Assessment, the project will not have a significant adverse impact on coastal resources.

Section 30253 Minimization of Adverse Impacts.
New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The subject site is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, within 5 kilometers of the Santa Monica Fault, and within the Single Permit Jurisdiction of the Coastal Zone.

The project site is also located within an area that may be affected by Sea Level Rise. On August 12, 2015, the Coastal Commission adopted a Sea Level Rise Policy Guidance document, updated and adopted On November 14, 2024. This policy document provides a framework and directions for local jurisdictions to address sea level rise (SLR) in Local Coastal Programs (LCPs) and Coastal Development Permits (CDPs). In May 2018, the City completed an initial sea level rise vulnerability assessment for the Venice Coastal Zone. The report provides that: Existing wide beaches generally protect Venice from coastal hazards. Coastal assets along or near the beachfront are potentially vulnerable during a large storm event in combination with SLR greater than 3.3 feet. After 4.9 feet SLR, beachfront assets are more vulnerable to damage from flooding or potential erosion of the beach. A SLR of 6.6 feet is a tipping point for Venice's exposure to extreme coastal wave events. Beachfront and coastal assets could flood annually, beaches could be greatly reduced in width, and high water levels could greatly increase potential for flooding of inland low-lying areas. As discussed in the analysis, there is considerable uncertainty around the timing of SLR, how coastal processes may be affected, and what adaptation approaches will be applied in the future (VSLRVA, pg. 45). Policies and development standards to address the potential impacts of SLR would be addressed in the City's LCP for the Venice Coastal Zone.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed use would have no adverse impacts on public access, recreation, public views or the marine environment, as the property is located within a developed residential area and located a half mile from Venice Beach. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filling, or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed dwelling

will not block any designated public access views. As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

b. The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

Coastal Act Section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act. The Venice Local Coastal Land Use Plan ("LUP") was certified by the California Coastal Commission on June 14, 2001; however, the necessary implementation ordinances were not adopted. The City is in the initial stages of preparing the LCP; prior to its adoption the guidelines contained in the certified LUP are advisory. The subject site is located within the North Venice Subarea with a land use designation of Neighborhood Office Commercial and zoned C2-1-O.

The following are applicable policies from the certified Venice Land Use Plan:

Policy I. A. 9. *Replacement of Affordable Housing. Per the provisions of Section 65590 of the State Government Code, referred to as the "Mello Act", the conversion or demolition of existing residential units occupied by persons and families of low or moderate income shall not be permitted unless provisions have been made for replacement of those dwelling units which result in no net loss of affordable housing in the Venice Community in accordance with Section 65590 of the State Government Code (Mello Act).*

Policy I.A.10. *Location of Replacement Housing. The replacement units shall be located in one or more of the following areas, listed in order of priority: 1) on the site of the converted or demolished structure; 2) within the site's Venice coastal subarea; 3) within the Venice Coastal Zone; 4) within the Venice Community Plan area east of Lincoln Boulevard; and, 5) within a three mile radius of the affected site.*

Policy I.A.11. *Replacement Ratios for Replacement Units. Replacement ratios shall be at a minimum of 1:1 (one unit replaced for each unit removed). Replacement ratios shall increase according to how far from the affected site replacement units are located as defined in the Mello Act.*

Policy I.A.13. *Density Bonus Applications. Required replacement dwelling units shall be counted as reserved units in any related State mandated density bonus application for the same project.*

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project is subject to the requirement under the Housing Crisis Act (SB 330/SB8) and the City's Interim Administrative Procedures for Complying with the Mello Act (IAP). The Los Angeles Housing Department

(LAHD) issued an SB330/SB8 Replacement Unit Determination (RUD) dated October 29, 2025 requiring the replacement of one (1) affordable replacement unit and one (1) market rate unit. As such, the four (4) residential units will be set aside for Very Low Income Households satisfies this requirement. Finding No. 5 provides a full discussion of the requirements under the IAP.

Policy I.A.14. Parking Requirements for Affordable Housing. Reduced parking is permitted for low income units only if: a) the project is consistent with LUP policy I.A.13; and b) it is demonstrated that the prospective occupants of the project will have a reduced demand for parking. However, if a unit changes its status from low or low-moderate income to market rate unit, parking should be provided for market rate units according to the parking standards listed in LUP Policies II.A.3 and II.A.4.

On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

Further, the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. Empirical surveys, provided the Parking Demand Management Assessment, demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

Policy I.B.2. Mixed-Use Development. Mixed-use residential commercial development shall be encouraged in all areas designated on the Land Use Policy Map for commercial use. Residential density in commercial land use designations shall not exceed one unit per 800-1200 square feet of lot area and shall comply with the Floor Area Ratio (FAR) limits set forth in Policy I.B.7. The design of mixed-use development is intended to help mitigate the impact of the traffic generated by the development on coastal access roads and reduce parking demand by reducing the need for automobile use by residents and encouraging pedestrian activity. Such development shall comply with the density and development standards set forth in this LUP.

As discussed in Finding No 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24 U.26. The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Specific Plan, as follows: Increase allowable FAR to 2.96:1 in lieu of 1.5:1,

decrease the front yard setback for residential floor area to allow 0 feet, 0 inches in lieu of 5 feet, increase the overall height for a total building height of 52 feet, 10 inches in lieu of 30 feet maximum, remove the step back provisions in lieu of a 45 degree step back plane, and Increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet. As discussed in Finding No. 1, the project qualifies for the requested incentive and waiver. As such, the proposed development is visually compatible with the character of the surrounding area, proposed density bonus, incentives, and waivers are consistent with the applicable policies of the Coastal Act and Venice LUP

Preservation of Venice as a Special Coastal Community

Policy I.E.1. General. Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

Policy I.E.2. Scale. *New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer, and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.*

Policy I.E.3. Architecture. *Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.*

The proposed project is visually compatible with the character of surrounding areas and sited and designed to protect coastal visual resources. The neighborhood and surrounding properties are developed with multi-family dwellings and commercial structure with zoning classifications of C2-1-O, RD1.-1-O, and C4-1. Surrounding properties include single and multi-story commercial structures and single and multi-story residential structures.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The property is developed with a three-story apartment and a two story fourplex, constructed in 1911 & 1912. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the requested 22 feet, 10 inches above the permitted flat roof height will **not be** materially detrimental to the adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates

articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

Policy II.C.1. General Non-Vehicular Coastal Access Policy. Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.

The proposed project will provide 28 vehicular parking spaces and 45 bicycle parking spaces. The subject site is located within a half mile of a Major Transit Stop, Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The proposed five story, mixed use structure is consistent with the policies of the Certified Venice Land Use Plan and the standards of the Venice Coastal Zone Specific Plan. The project will not prejudice the ability of the City to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act.

c. The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination.

The Los Angeles County Interpretive Guidelines were adopted by the California Coastal Commission (October 14, 1980) to supplement the Statewide Guidelines. Both regional and statewide guidelines, pursuant to Section 30620 (b) of the Coastal Act, are designed to assist local governments, the regional commissions, the commission, and persons subject to the provisions of this chapter in determining how the policies of this division shall be applied to the coastal zone prior to the certification of a local coastal program.

As stated in the Regional Interpretive Guidelines, the guidelines are intended to be used "in a flexible manner with consideration for local and regional conditions, individual project parameters and constraints, and individual and cumulative impacts on coastal resources". In addition to the Regional Interpretive Guidelines, the policies of the Venice Local Coastal Program Land Use Plan (the Land Use Plan was certified by the Coastal Commission on June 14, 2001) have been reviewed and considered. As discussed in Finding No. 2.b, the proposed development is consistent with the applicable policies of the certified Venice LUP.

d. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean; located within the Single Permit Jurisdiction of the Coastal Zone, where the local jurisdiction (City of Los Angeles) issues Coastal Development Permits. The Coastal Commission will render decisions on appeals of the City's Coastal Development Permits or Coastal Exemptions. The Coastal Commission took action on the following residential projects in the Venice Coastal Zone:

- In August 2025, the Commission, on consent, approved a Coastal Development Permit authorizing the after-the-fact demolition of a two-story, 6,952 square foot commercial building damaged by a fire in 2021 and the construction of a new three-story, 38 foot 4 inch high, 12,983 square foot mixed use building with 16 dwelling units, three of which will be set aside for Very Low Income Households; a 1,488 square foot roof deck with three roof access structures and 42 inch guardrails; a 1,363 square foot

ground floor retail/take-out restaurant space; nine parking spaces including two reserved for a residential car share program; 26 bicycle spaces including 18 reserved for residents and 8 reserved for commercial employees and patrons; and 21 cubic yards of cut with 16 cubic yards retained for fill, located at 723 Ocean Front Walk (5-24-0402).

- In December 2024, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the Venice Dell Community Project consisting of 1) the demolition of two existing, City-owned 196-space and seven-space public surface parking lots and an existing two-story, 1,970 square foot four-unit quadraplex; 2) the consolidation of 40 lots and subdivision into two ground lots and seven airspace lots; and 3) the construction of two new, three- and four-story, 35-ft. tall mixed-use structures totaling 103,957 square feet of habitable interior area and 137,805 square feet of interior garage area. The west structure includes a 67-ft. tall campanile, 63 affordable dwelling units, 3,065 square feet of commercial uses, 104 residential and commercial parking spaces, and one parking space reserved for public boat launch ramp access, as well as a subterranean level. The east structure includes 77 affordable dwelling units, a 2,875 square foot art studio, 250 public parking spaces, and three parking spaces reserved for public boat launch ramp access. An on-street loading/unloading space for vehicle access to the boat launch ramp would be provided on North Venice Boulevard. 9,100 cubic yards of cut and no fill is locally approved. At the de novo hearing, the Commission approved a modified project (5-22-0588).

- In February 2024, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of three residential structures, the merger of two lots into one 7,800 square foot lot, and the construction of a 15,016 square foot four-story, residential structure with eight condominium units (one unit Very Low Income and two Low Income) with 12 parking spaces and removal of five ornamental trees located at 2308 and 2310 Pisani Place (A-5-VEN-23-0044).

- In November 2021, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of three detached structures with nine dwelling units, consolidation of two lots, and construction of a new, three-story over basement, 13,412 square foot, mixed-use development including nine dwelling units, including one affordable dwelling unit, a 1,568 square foot restaurant, and 27 parking spaces on the two ocean-fronting lots at 815 Ocean Front Walk (A-5-VEN-21-0063).

- In December 2020, the Commission, on appeal, found No Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of a 2,056 square foot auto repair shop and addition to and conversion of a 2,482 square foot philanthropic use structure resulting in a four-story, 30,463 square foot mixed-use structure including 39 permanent supportive housing units and one manager unit, with 4,441 square feet of supportive services and 3,085 square feet of ground-floor commercial (office) space with a total of 6 on-site parking spaces, and 42 bicycle parking spaces located at 2467-2471 South Lincoln Boulevard (A-5-VEN-20-0060).

- In June 2019, the Commission, on appeal, found No Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of two institutional use structures and the construction of a 4-story, 35-unit affordable

supportive housing complex with approximately 1,875 square feet of administrative and program office space and 17 automobile and 48 bicycle parking spaces on two contiguous parcels located at 720 Rose Avenue (A-5-VEN-19-0020).

- On August 9, 2005, the Commission approved a Coastal Development Permit (de novo hearing) for the development of a three-story, 37-foot tall (up to 50 feet for one clock tower), mixed use project comprised of 70 residential condominium units of which seven are restricted for Very Low Income Households, five live/work units, and one groundfloor commercial use (bakery/restaurant), providing 247 parking spaces within a subterranean garage; the project is located on eight consolidated lots at 512 Rose Avenue, in the single permit jurisdiction (A-5-VEN-05-206).

In several decisions, the Coastal Commission approved increase density and Density Bonus incentives for increased height and reduced yards, determining that the resulting development would be consistent and visually compatible with existing development in the project vicinity. As such, this decision of the permit granting authority has been guided by applicable decisions of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

e. The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

Section 30210 of the Coastal Act states the following in regards to public access:

> *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, right of private property owners, and natural resources from overuse.*

Section 30211 of the Coastal Act states the following in regards to public recreation policies:

> *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

The subject property is located about one half mile away from the Pacific Ocean shoreline. The project could have an impact on public access to the coast if it resulted in a loss of on-street parking spaces or did not provide adequate parking for the dwelling. As described in the Parking Demand Management Assessment, the proposed project provides an array of alternative modes of travel including parking and bicycle parking to adequately serve the residents and patrons. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

f. An appropriate environmental clearance under the California Environmental Quality

Act has been granted.

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32). A full discussion is provided in Finding No. 6.

4. Project Permit Compliance Review Findings

a. The project substantially complies with the applicable regulations, findings, standards, and provisions of the Venice Coastal Zone Specific Plan.

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. As conditioned, the proposed project complies with the applicable General Land Use and Development Regulations set forth in Section 9, Land Use and Development regulations for the North Venice subarea set forth in Section 10.F, and the Parking provisions set forth in Section 13 of the Specific Plan as evidenced below:

A. Section 8.C. Findings

The project meets the required findings set forth in Section 8.C of the Venice Coastal Zone Specific Plan, as shown below:

1. The Venice Coastal Development Project is compatible in scale and character with the existing neighborhood, and that the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The subject site adjoins an unnamed alley at the rear. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. The proposed development is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault.

The subject property is located within the Venice Community Plan area with a Neighborhood Office Commercial Land Use Designation. The subject property is also

located within the area of the Venice Coastal Land Us Plan certified by the California Coastal Commission and adopted as a plan amendment to the Venice Community Plan. The subject property is also located within the North Venice Subarea of the Venice Coastal Zone Specific Plan, the Los Angeles Coastal Transportation Corridor Specific Plan, and within the Single Permit Jurisdiction area of the California Coastal Zone.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

2. The Venice Coastal Development Project is in Conformity with the Certified Venice Local Coastal Program.

A Local Coastal Program is comprised of a Land Use Plan and Implementation Plan, certified by the California Coastal Commission. The Venice Local Coastal Land Use Plan ("LUP") was certified by the Coastal Commission on June 14, 2001, however, the necessary Implementation Plan was not certified. The proposed project conforms to the applicable policies of the certified Venice LUP, as outlined in Finding No. 2.b.

3. ***The applicant has guaranteed to keep the rent levels of any Replacement Affordable Units at an affordable level for the life of the proposed project and to register the Replacement Affordable Unit with the Los Angeles Housing Department.***

   Per the Mello Act Determination letter, dated May 18, 2022, the Los Angeles Housing Department has determined that no affordable units exist at the subject site. The subject site consists of a vacant lot and two single-family dwellings. The owner filed an application with City Planning on March 21, 2021. LAHD collected monthly housing cost data for at least the previous three (3) years from March 2018 to March 2021. The Rent Stabilization Ordinance ("RSO") Unit confirmed that 1410 South Main Street has been a vacant lot since March 2018. 1414 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $ 3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018 - 2021 for a Moderate Level two (2) bedroom unit is $ 1,854, therefore the unit was rented at above affordable levels from March 201 8 - March 2021. 1418 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $ 3,551. The average Land Use Schedule 7 Maximum Allowable Rent for the years 201 8 -2021 for a Moderate Level two (2) bedroom unit is $ 1,854, therefore the unit was rented above affordable levels from March 201 8 - March 2021. The data collected from March 2018 - March 2021 shows that no affordable units exist at 1410 - 1418 South Main Street. Also see Finding No. 5.

4. ***The Venice Coastal Development Project is consistent with the special requirements for low- and moderate-income housing units in the Venice Coastal Zone as mandated by California Government Code Section 65590 (Mello Act).***

   Inclusionary Residential Units are required for this project. The project proposes the construction of 20 new Residential Units. Pursuant to Part 5 of the Interim Administrative Procedures, development which consists of 10 or greater Residential Units are New Housing Developments and are required to provide Inclusionary Residential Units. The proposed development of 20 new Residential Units provides four (4) affordable units, of which two (2) are Inclusionary Residential units. Therefore, the project provides the required affordable units under the Mello Act. See Finding No. 5.

In addition to the requisite findings set forth in Section 8.C of the Specific Plan, the project also complies with all applicable provisions of the Specific Plan, as set forth below:

B. Section 9. General Land Use and Development Regulations

1. *Lot Consolidation. Lot consolidation of more than two lots shall be permitted for mixed-use and multi-family residential Venice Coastal Development Projects, provided the project conforms to the existing scale and characteristic of the surrounding community, the required parking is onsite, and the project conforms to developments standards in Section 9.A.2 of the Specific Plan.*

   The proposed project consists of the consolidation of three (3) residential lots for the construction of a five-story, 26,889 square foot, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very

Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean garage. As discussed in Finding No. 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24-U.26. The project will utilize Land Use Policy I.B.7 where there are three lots with subterranean. Mixed use projects are permitted the consolidation of more than two lots if they conform to the existing scale and character of the surrounding community and provide adequate onsite parking. As discussed previously, the project is in line with midrise structures within a half mile of the project site that range in height from four to five stories. In addition, the project is eligible for AB 2097 and the City is not able to require additional parking for commercial and residential structures.

2. *Height. Height shall be measured from the centerline of the street or alley or walk adjacent to the front lot line measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building.*

   As shown in "Exhibit A", the height of the structure is measured from the centerline of Main Street and conforms to standard of measurement.

3. Roof Structures. Roof Access Structures shall not exceed the Flat Roof height limit by more than ten feet regardless of roof type. The project site proposes a 10-foot roof access structure with solar trellis, where building height is measured to the top of the solar trellis. As such, the project complies with Section 9.B. of the Specific Plan.

C. *Sections 10.F. Land Use and Development Regulations for North Venice Subarea*

1. *Density.* Projects in the North Venice Subarea on a commercially zoned lot shall exceed the density permitted in the R3 Zone.

   As discussed in Finding No. 2, the project qualifies for an On-Menu Incentive for height pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 (Density Bonus Affordable Housing Program). The project requests approval of a Density Bonus and the project propose 20 dwelling units, with four (4) affordable units, of which two (2) are considered Inclusionary Replacement Units. The project's proposed density is greater than 25 percent and as discussed in Finding No. 2, will not have any adverse effects on coastal resources.

2. *Height. Projects with a flat roof shall not exceed a maximum height of 30 feet. Projects with a varied roofline shall not exceed a maximum height of 35 feet.* The project proposes a Flat Roof with a maximum height of 52 feet 10 inches. As discussed in Finding No. 2, the project qualifies for a Waiver of Development Standards for height pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 (Density Bonus Affordable Housing Program).

Pursuant to the Venice Specific Plan North Venice Subarea, Venice Coastal Development Projects with flat roofs may be up to 30 feet in height. The project's proposed height is measured from the centerline of Main Street. With approval of the Density Bonus incentive, the project complies with the height provisions of the Specific Plan. The height increase is also consistent with the mass and scale of existing buildings within half a mile of the project site with residential and commercial structures ranging from four to five stories.

3. *Access.* Driveways and vehicular access to Venice Coastal Development Projects shall be provided from alleys, unless the Department of Transportation determines that it is not Feasible. As shown in "Exhibit A", the proposed project maintains vehicle access from the abutting rear alley.

D. Section 11 – Commercial Design Standard

1. *Ground Floor Commercial Development. Pursuant to the Venice Coastal Specific Plan, all commercial Venice Coastal Development Projects which fronts on Ocean Front Walk shall include a street wall which extends a minimum of 65 percent of the length of the Building Frontage, is set back zero feet from the building line, with a minimum height of 13 feet. In addition, a minimum of 50 percent of the area of the Ground Floor Street Wall of a commercial Venice Coastal Development Project shall be devoted to pedestrian entrances or windows; and there shall be at least one pedestrian entrance into each business or use for each Store Frontage.* As proposed, two restaurants and one take out restaurant will be located on the Ground Floor of the new mixed-use building observing no setback from the building line. The commercial portion of the Street Wall has a height of 13 feet as required. The Street Wall that the restaurant and take out restaurant spaces will occupy is approximately 91 percent of the ground floor. A pedestrian walkway and entrance are provided for the restaurant from the front of the structure along Main Street. Therefore, the project complies with the ground floor commercial development provisions of the Plan.

2. *Floor Area Ratio.* As discussed in Finding No. 2, the project qualifies for an off-menu incentive, pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program), for an FAR increase of 97.3 percent. The project proposes a FAR of 2.96:1 and a total lot area of 26,889 square feet.

3. *Access.* The project will provide access to the project site from the abutting alley. No new curb cuts are proposed along Main Street and all on-street parking opportunities will be maintained.

4. *Landscaping.* The project provides approximately 1,106 square feet of usable common open space on the roof deck of the structure. The project provides four new street trees.

5. *Light.* Any lighting is downward facing and is directed away from existing residential structures. The project is not located near Environmentally Sensitive Habitat Areas.

6. *Trash.* A residential and commercial trash enclosure/room is located at the ground level and includes regular trash and recycling chutes on all levels.

E. Section 13 – Parking

Pursuant to Section 13.D of the Specific Plan, restaurants shall provide one space per 50 square feet, window service restaurants shall provide one space per 50 square feet, office uses shall provide one space per 250 square feet, multi-family dwellings on a lot with a width of 40 feet or more shall provide two spaces for each dwelling unit, plus a minimum of one guest parking space for each four or fewer units, and Beach Impact Parking shall provide one space for each 640 square feet of floor area of the Ground Floor for commercial and industrial Venice Coastal Development Projects. As such, a total of 118 (73 Commercial and 45 Residential) parking spaces is required. However, the proposed project is located within a major transit stop (ZIMAS) and therefore, under Assembly Bill 2097 (AB 2097), the proposed project is not required to provide commercial or residential parking spaces, however, the proposed project will provide 28 vehicle parking spaces and 45 bicycle parking spaces to assist with mitigating any impacts around the project site.

b. The project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible.

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32). A full discussion is provided in Finding No. 5. The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit D.

Therefore, no mitigation measures or alternatives were identified in the environmental review.

Mello Act Compliance Review

5. Mello Act Compliance Review. Pursuant to the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act (IAP), all Conversions, Demolitions, and New Housing Developments must be identified in order to determine if any Affordable Residential Units are onsite and must be maintained, and if the project is subject to the Inclusionary Residential Units requirement. Accordingly, pursuant to the settlement agreement between the City of Los Angeles and the Venice Town Council, Inc., the Barton Hill Neighborhood Organization, and Carol Berman concerning implementation of the Mello Act in the Coastal Zone Portions of the City of Los Angeles, the findings are as follows:

a. Demolitions and Conversions (Part 4.0)

The project consists of the demolition of two Residential Units and the construction of 20 Residential Units in the Coastal Zone. The owner filed an application with the Department of City Planning on March 11,2021. Therefore, the Los Angeles Housing Department collected data from March 2018 to March 2021. Since March 2018, the property at 1410 South Main Street has been a vacant lot. 1414 South Main Street was rented during a look back period at an average amount of $3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018-2021 for a Moderate Level two (2) bedroom unit is $1,854, therefore the unit was rented at above affordable levels from March 2018 – March 2021. As such, the data collected from March 2018 – March 2021 shows that no affordable units exist on site. Therefore, no Affordable Replacement Units are required.

b. New Housing Developments (Part 5.0)

Part 5.0 of the IAP requires New Housing Developments of 10 or more Residential Units to provide Inclusionary Residential Units and provides two options:

- Option 1 requires 20 percent of all Residential Units, be reserved for occupancy by Very Low or Low Income Households.
- Option 2 requires 10 percent of all Residential units, be reserved for occupancy by Very Low Income Households.

The applicant proposes the construction of 20 Residential Units, of which four (4) units will be set aside for Very Low Income Households for a period of 55 years. The project satisfies Option 2 of Part 5.0 of the IAP and the requirements of LAMC Section 12.22 A.37. The four affordable units are required to satisfy the requirements of the requested Density Bonus Incentives and Waivers. Therefore, they are subject to the requirements of LAMC Section 16.60 (RPO).

CEQA Findings

6. Environmental Findings

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32).

The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit D.

The Class 1 Categorical Exemption allows for demolition and removal of individual small structures such as a duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling

units will be demolished. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The project proposed the demolition of two dwelling units and therefore qualifies for an exemption of this Class.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria: a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; c) The project site has no value as habitat for endangered, rare or threatened species; d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and e) The site can be adequately served by all required utilities and public services. The project qualifies for a Class 32 Categorical Exemption as an infill project, as evidenced below:

CEQA Determination – Class 32 Categorical Exemption Applies

a. **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.**

   The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations: The site is zoned C2-1-O and has a General Plan Land Use Designation of Neighborhood Office Commercial. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces and is in conformance with the General Plan and Zoning Designation.

b. **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

   The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The site is wholly within the City of Los Angeles, and is completely surrounded by urban uses. Surrounding properties include and multi-story residential uses.

c. **The project site has no value as a habitat for endangered, rare, or threatened species.**

The project site has no value as habitat for endangered, rare or threatened species. The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species: The area around the site is highly urbanized and surrounded by residential uses. NavigateLA shows that the subject site is not located in a Significant Ecological Area. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952 and has no value as a habitat for endangered, rare or threatened species.

d. **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance for pollutant discharge, dewatering, and stormwater mitigations; and Best Management Practices for stormwater runoff. More specifically, RCMs include but are not limited to:

- **Regulatory Compliance Measure RC-AQ-1 (Demolition, Grading and Construction Activities): Compliance with provisions of the Southern California Air Quality Management District (SCAQMD) District Rule 403.** The project shall comply with all applicable standards of the SCAQMD, including the following provisions of District Rule 403:

  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

  - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), to prevent excessive amounts of dust.

  - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

  - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

  - General contractors shall maintain and operate construction equipment to minimize exhaust emissions.

  - Trucks having no current hauling activity shall not idle but be turned off.

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

These RCMs will reduce any potential impacts on noise and water quality. Furthermore, the project does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) for preparing a traffic study. The project will not conflict with any adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities. Therefore, the project will not have any significant impacts to traffic. Likewise, air quality will not worsen as a result of the proposed project. Interim thresholds were developed by DCP staff based on CalEEMod model runs relying on reasonable assumptions, consulting with SCAQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. **The site can be adequately served by all required utilities and public services.**

The project site will be adequately served by all public utilities and services given that the property was previously developed with commercial uses surrounded by urban uses, served by existing infrastructure, and is consistent with the General Plan.

The project is a transit-oriented, infill development on a site within an urbanized area and meets the criteria outlined above. Therefore, the project qualifies for a Class 32 Categorical Exemption.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

The City has considered whether the proposed Project is subject to any of the six (6) exceptions that would prohibit the use of a categorical exemption as set forth in State CEQA Guidelines Section 15300.2. The six (6) exceptions to this Exemption are: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

a. **Cumulative Impacts.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The project is consistent with the type of development permitted for the area zoned C2-1-O and designated Neighborhood Office Commercial. The proposed project has submitted a Parking Demand Study and Noise Report to indicate no significant impacts will be made as a result of this project. As such, the proposed project will not exceed thresholds identified for impacts to the area (i.e., traffic, noise, etc.) and will not result in significant cumulative impacts.

b. **Significant Effect Due to Unusual Circumstances.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The surrounding area is developed with similar residential and commercial uses. There are 9 existing midrise buildings within 0.5 miles of the project site that range between four to five stories. The proposed height and massing are not unusual for the project vicinity or the nearby Windward Circle. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

c. **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. State Route 27 is located more than 7 miles northwest of the project site. Therefore, the project will not impact a designated state scenic highway.

d. **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
The project site is not identified as a hazardous waste site or is on any list compiled pursuant to Section 65962.5 of the Government Code.

e. **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

ADDITIONAL MANDATORY FINDING

8. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone AE, areas of One Hundred-Year Flood where the Base Flood elevations and Flood Hazard factors have been determined.

TO: Los Angeles City Planning Commission

CASE NUMBER: CPC-2021-2020 **Appellant:** Rick Garvey

DATE OF APPEAL: May 5, 2026

CONTACT: Rick Garvey, rickgarvey@hotmail.com, 310-721-1647

SUMMARY: This appeal challenges the CPC's approval of the proposed 5-story mixed-use development at 1410–1422 Main Street, Venice, CA. Appellant contends violations of CEQA, the Coastal Act, Density Bonus law, and Mello Act requirements, and misrepresentations of lot usage and neighborhood compatibility.

Requested Relief:

1. Deny the CPC determination.
2. Require proper environmental review under CEQA.
3. Require compliance with Coastal Act, Mello Act, and Venice-specific plans.
4. Revise development proposal to reduce height, massing, density, and parking impacts consistent with neighborhood character.

PROJECT:

1410-1422 Main Street, Venice, CA 90291

CASE NUMBER: CPC-2021-2020

Appellant: Rick Garvey
5-5-2026

Contents

Summary of Violations Table 1

Appeal Findings Summary 2

- Finding 1 – Misrepresentation of Lot Use 2
- Finding 2 – Height and Mass Inconsistencies 2
- Finding 3 – CEQA Incomplete Analysis 2
- Finding 4 – Coastal Act Violations: Public Access & Parking 2
- Finding 5 – Density Bonus Misapplication 2
- Finding 6 – Mello Act Non-Compliance 2
- Finding 7 – Neighborhood Character & Safety 2
- Finding 8 – Alley Access and Safety Concerns 2
- Finding 9 – Parking Deficiency and Beach Impact 3
- Finding 10 – Inconsistent Open Space Calculation 3
- Finding 11 – Inadequate Flood Management / Basement Parking 3
- Finding 12 – Incomplete Density Bonus Justification 3
- Finding 13 – Visual & Community Character Impacts 3
- Finding 14 – Lack of CEQA Cumulative Impact Analysis 3
- Finding 15 – Misapplication of AB 2097 / Reduced Parking 3

Appeal Justification and Narrative 4

I. Introduction and Legal Standard 4

II. Detailed Appeal Findings 5

- Appeal Finding 1 – The City's Determination Relies on an Incomplete and Misleading Project Description in Violation of CEQA 5
- Appeal Finding 2 – The Transportation Analysis Is Legally Inadequate and Not Supported by Substantial Evidence 5
- Appeal Finding 3 – The City Failed to Analyze Safety Impacts Associated with Alley Access, in Violation of CEQA 6
- Appeal Finding 4 – The City Failed to Analyze Cumulative Transportation and Parking Impacts in a Constrained Coastal Environment 7

III. Coastal Act and Density Bonus Violations 7

- Appeal Finding 5 – The City Failed to Properly Apply and Harmonize the State Density Bonus Law with the Coastal Act 7
- Appeal Finding 6 – The Project Violates Coastal Act Section 30251 (Visual Resources and Community Character) 8
- Appeal Finding 7 – The Project Violates Coastal Act Section 30252 (Public Access and Parking) 9

Appeal Finding 8a – The City Failed to Properly Analyze and Mitigate Safety and Access Impacts Under Coastal Act Section 30253 9

Appeal Finding 8b – The Project Violates Coastal Act Section 30253(e) and Venice LUP Policy I.E.1 by Degrading Venice's Designation as a Special Coastal Community 10

Appeal Finding 9 – The City's Coastal Act Consistency Finding Is Internally Contradictory and Unsupported 11

IV. Mello Act Violations 12

Appeal Finding 10 – The City Misapplied the Mello Act by Failing to Properly Evaluate the Loss of Residential Use and Coastal Housing Protections 12

V. CEQA Violations 13

Appeal Finding 11 – The City Improperly Relied on a Categorical Exemption Despite Substantial Evidence of Significant Impacts 13

Appeal Finding 12 – The City's CEQA Findings Lack Substantial Evidence 15

VI. Procedural Errors and Defective Findings in Staff Report and Determination Letter 15

Appeal Finding 13 – The City Failed to Respond to Contrary Evidence in the Record 15

Appeal Finding 14 – The Findings Are Internally Inconsistent and Factually Wrong 16

Appeal Finding 15 – The City Failed to Proceed in the Manner Required by Law 16

VII. Appellant's Aggrievement 17

VIII. Conclusion and Request for Relief 17

Exhibit Index 18

APPENDIX 19

Summary of Violations Table

Item #	Violation	Legal Basis	Evidence / Exhibit
1.	**CEQA – incomplete environmental review**	CEQA Guidelines §15151, §15162	Exhibits B, F, G, X
2.	**Coastal Act – neighborhood compatibility (Height & Mass)**	Cal. Pub. Resources Code §30251	Exhibits H, C, D
3.	**Coastal Act – public access & parking**	§30252	Exhibits H, B
4.	**Coastal Act – protection of special communities**	§30253	Exhibits H, B, X
5.	**Density Bonus law misapplication**	LAMC 12.22 A.37, AB 2097	Exhibits H, B
6.	**Mello Act – residential preservation & lot consolidation**	LAMC 12.22 A.25	Exhibits H, B, X
7.	**Alley & traffic impacts**	Venice Specific Plan 11.B.3, LAMC 12.22	Exhibits H, X, F
8.	**Inaccurate project description & lot usage**	CEQA §15151, LAMC 12.11	Exhibits H, X, F

Appeal Findings Summary

Finding 1 – Misrepresentation of Lot Use

The CPC determination mischaracterizes Lot 3 (1410 Main Street) as vacant. Drone evidence demonstrates the lot is actively used as a live/work space with shipping containers. This misrepresentation affects CEQA review, parking calculations, and neighborhood compatibility. ***Evidence:*** Exhibit X, Exhibits F, H

Finding 2 – Height and Mass Inconsistencies

The proposed 4-story + roof trellis structure exceeds the Venice Specific Plan step back and height guidelines, creating a bulk inconsistent with surrounding R4/R3 density. ***Evidence:*** Exhibits H, B, C, D

Finding 3 – CEQA Incomplete Analysis

Staff failed to evaluate cumulative impacts, traffic, pedestrian safety, and alley access adequately. The environmental review is insufficient under CEQA. ***Evidence:*** Exhibits B, F, G, X

Finding 4 – Coastal Act Violations: Public Access & Parking

The project's reduced parking and alley access create conflicts with §30252, limiting public access and increasing vehicular congestion. ***Evidence:*** Exhibits H, B, X

Finding 5 – Density Bonus Misapplication

The project seeks excessive FAR and off-menu incentives inconsistent with AB 2097 and LAMC 12.22 A.37, with insufficient justification for departures. ***Evidence:*** Exhibits H, B

Finding 6 – Mello Act Non-Compliance

The consolidation of lots and lack of proper residential preservation violate Mello Act requirements. ***Evidence:*** Exhibits H, B, X

Finding 7 – Neighborhood Character & Safety

The project's scale, lack of setback, and active alley use negatively impact Venice neighborhood character and safety. ***Evidence:*** Exhibits H, C, D, X

Finding 8 – Alley Access and Safety Concerns

The alley is insufficient for the proposed volume of vehicles, pedestrians, and service activity. Existing 7–8 ft width plus active use of Lot 3 (Exhibit X) exacerbates congestion and risk. ***Evidence:*** Exhibits H, X, F

Finding 9 – Parking Deficiency and Beach Impact

The project under-provides residential and commercial parking under Venice Specific Plan §13, creating spillover onto neighborhood streets and impacting beach access. ***Evidence:*** Exhibits H, B, F

Finding 10 – Inconsistent Open Space Calculation

The developer miscalculates required vs. provided common open space, improperly excluding rooftop landscape and private decks from total calculations. ***Evidence:*** Exhibits H, B

Finding 11 – Inadequate Flood Management / Basement Parking

The project's basement parking fails to demonstrate compliance with FEMA AE Zone requirements and floodproofing. ***Evidence:*** Exhibits H, B

Finding 12 – Incomplete Density Bonus Justification

The project requests excessive off-menu incentives and FAR beyond Venice Coastal Zone Specific Plan, without adequate findings supporting departure from step-back and yard requirements. ***Evidence:*** Exhibits H, B

Finding 13 – Visual & Community Character Impacts

The massing, height, and step back waivers substantially alter neighborhood visual character, conflicting with Coastal Act §30251. Evidence: Exhibits H, C, D

Finding 14 – Lack of CEQA Cumulative Impact Analysis

CPC staff report fails to assess cumulative effects of density, traffic, parking, and neighborhood congestion. ***Evidence:*** Exhibits B, F, G

Finding 15 – Misapplication of AB 2097 / Reduced Parking

Reduced parking provisions improperly rely on AB 2097, failing to account for commercial impacts, local conditions, and existing alley constraints. ***Evidence:*** Exhibits H, B, X

Appeal Justification and Narrative

Prepared by Rick Garvey et al. on 5/4/2026

Project: 1410–1414–1422 Main Street, Venice

Case No.: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

I. Introduction and Legal Standard

This appeal challenges the City Planning Commission's approval of the proposed mixed-use development at 1410 Main Street in Venice on the grounds that the determination is legally defective, factually unsupported, and fails to comply with the California Environmental Quality Act ("CEQA"), the California Coastal Act, the Mello Act, and applicable provisions of state Density Bonus law. The approval must be reversed because the City failed to proceed in the manner required by law and because its findings are not supported by substantial evidence in the administrative record. (Pub. Resources Code § 21168.5.)

Under CEQA, an agency abuses its discretion where it has "not proceeded in a manner required by law or if the determination or decision is not supported by substantial evidence." (Pub. Resources Code § 21168.5.) "Substantial evidence" is defined as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion," and explicitly excludes "argument, speculation, unsubstantiated opinion or narrative." (CEQA Guidelines § 15384(a).) Moreover, the California Supreme Court has made clear that agencies must "set forth findings to bridge the analytic gap between the raw evidence and ultimate decision." (Topanga Assn. for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506, 515.) Where that analytical bridge is missing—as it is here—the determination cannot stand.

The City's determination approving this project fails on multiple independent grounds. Most significantly, the approval is based on a fundamentally defective project description and a transportation analysis that excludes a major component of the project—its restaurant uses—in order to avoid environmental review. This error infects the entirety of the CEQA analysis. In addition, the City failed to evaluate safety impacts associated with the project's reliance on a substandard alley for all access, failed to analyze cumulative impacts in a highly constrained coastal environment, and relied on factual assertions that are demonstrably incorrect. These are not minor or technical deficiencies; they are core failures that undermine the legality of the approval.

II. Detailed Appeal Findings

Appeal Finding 1 – The City's Determination Relies on an Incomplete and Misleading Project Description in Violation of CEQA

The City's determination is predicated on a project description that is materially incomplete and misleading because it excludes the transportation impacts of the project's restaurant uses.

In the sections of the determination addressing transportation impacts and CEQA clearance, the City concludes that the project generates a minimal number of daily trips and therefore does not require further analysis. However, those conclusions are based on the express exclusion of approximately 5,750 square feet of restaurant uses from the trip generation calculation. This omission is not disclosed as a limitation in the findings but instead functions as the foundational assumption upon which the City's conclusion of no impact is based.

CEQA requires that a project be evaluated in its entirety. CEQA Guidelines section 15378(a) provides that a "project" means "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." Similarly, CEQA Guidelines section 15124 requires that a project description include "a general description of the project's technical, economic, and environmental characteristics" sufficient to allow meaningful evaluation of impacts. A project description that omits a major use or mischaracterizes the intensity of that use is legally inadequate because it prevents decision-makers and the public from understanding the project's true impacts.

Here, the restaurant component is not ancillary or de minimis. It is a central feature of the project and one that generates a distinct and substantial category of impacts, including customer traffic, deliveries, employee trips, and late-night activity. By excluding that use from the transportation analysis, the City effectively evaluated only a portion of the project. This constitutes classic "piecemealing," which CEQA prohibits. As the California Supreme Court held in Bozung v. Local Agency Formation Commission (1975) 13 Cal.3d 263, 283, "environmental consideration of a project cannot be avoided by chopping it up into bite-size pieces." The City's approach here does precisely that.

Because the project description is incomplete, every conclusion derived from it is unreliable. The City's finding that the project will not result in significant transportation impacts is not a conclusion about the actual project, but rather about a hypothetical version of the project in which restaurant uses generate no trips. That is not substantial evidence; it is an analytical artifact created by omission. As such, the determination fails to proceed in the manner required by law.

Appeal Finding 2 – The Transportation Analysis Is Legally Inadequate and Not Supported by Substantial Evidence

The City's determination relies on a transportation "screening memorandum" to conclude that the project will not result in significant transportation impacts. This conclusion is not supported by substantial evidence because the memorandum itself is methodologically flawed and factually unsupported.

CEQA defines substantial evidence as "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (CEQA Guidelines § 15384(a).) It expressly excludes "argument, speculation, unsubstantiated opinion or narrative." (Id.) The memorandum relied upon by the City contains no empirical data, no field observations, no intersection analysis, and no evaluation of site-

specific conditions. It does not include turning movement counts, pedestrian counts, bicycle counts, or any assessment of delivery or loading activity. Most critically, it excludes restaurant uses entirely from trip generation, thereby eliminating the primary source of transportation demand.

The determination, in its discussion of transportation impacts, adopts the conclusions of this memorandum without independent analysis. It states, in substance, that the project generates approximately 86 daily trips and therefore falls below applicable thresholds. However, the record demonstrates that this figure is artificially low because it excludes restaurant trips. When those uses are properly included, the project would generate several hundred daily trips, well above the screening threshold that triggers further analysis.

This discrepancy is not merely technical; it is outcome determinative. The City's conclusion that no further analysis is required depends entirely on the exclusion of restaurant trips. If those trips are included—as CEQA requires—the project would not qualify for screening and would require a full transportation analysis. The City's failure to address this discrepancy or explain its methodology renders its findings unsupported by substantial evidence.

Moreover, CEQA requires that an Environmental Impact Report be prepared whenever there is substantial evidence supporting a "fair argument" that a project may have a significant environmental effect. (CEQA Guidelines § 15064(f)(1).) The standard is intentionally low: if a reasonable argument can be made based on the evidence, further analysis is required. Here, substantial evidence exists in the form of the project's size, its restaurant component, its location in a high-traffic coastal area, and common-sense trip generation rates for restaurant uses. The City's conclusion that no significant impacts may occur ignores this evidence and therefore violates CEQA.

Appeal Finding 3 – The City Failed to Analyze Safety Impacts Associated with Alley Access, in Violation of CEQA

The City's determination includes generalized findings that site access and circulation are adequate, yet it contains no analysis of the project's reliance on a narrow alley for all vehicular access. The record establishes that the alley serving the site is substandard in width and already constrained. Despite this, the determination does not analyze how the project's increased intensity of use—including residential traffic, restaurant patrons, delivery vehicles, waste hauling, and emergency response—will function within this constrained space.

CEQA Guidelines section 15064.3(a) provides that while vehicle miles traveled is the primary metric for transportation impacts, "a project's effect on automobile delay shall not constitute a significant environmental impact," but does not eliminate the requirement to analyze safety impacts. To the contrary, safety-related transportation impacts remain relevant under CEQA, including "hazards due to a design feature (e.g., sharp curves or dangerous intersections)" and "conflicts between vehicles, bicycles, and pedestrians." (CEQA Guidelines Appendix G.)

Here, the project presents precisely those types of hazards. The alley must accommodate two-way vehicle travel, deliveries, trash collection, and pedestrian movement within a constrained width. The City's determination does not evaluate turning radii, vehicle stacking, conflicts between pedestrians and vehicles, or the ability of emergency vehicles to access the site. There is no analysis of whether fire apparatus can maneuver within the alley or whether simultaneous ingress and egress can occur safely.

The failure to analyze these issues is particularly problematic given that they are not speculative; they are inherent in the project design. Unlike broader traffic conditions, which may vary, the physical constraints of the alley are fixed. The City's failure to evaluate these conditions, despite clear evidence in the record, constitutes a failure to proceed in the manner required by law and renders the safety findings unsupported.

Appeal Finding 4 – The City Failed to Analyze Cumulative Transportation and Parking Impacts in a Constrained Coastal Environment

The CPC determination concludes that the project will not result in significant impacts without evaluating cumulative conditions. This omission violates CEQA's explicit requirement that agencies consider cumulative impacts. CEQA Guidelines section 15130(a) provides that "the cumulative impact from several projects shall be considered… when the project's incremental effect is cumulatively considerable." An effect is cumulatively considerable if it is significant when viewed in connection with the effects of past, current, and probable future projects. (Id.)

The project site is located in Venice, a coastal area characterized by high visitor demand, limited parking supply, and existing congestion. The record reflects that parking and traffic conditions are already constrained due to beach access, commercial activity, and residential use. The project introduces additional demand through both residential units and restaurant uses, yet the determination does not evaluate how this demand will interact with existing conditions.

Instead, the City treats the project in isolation and relies on the same flawed trip generation assumptions discussed above. This approach ignores the reality that even modest increases in demand can have significant effects in an already constrained environment. The project's substantial parking deficit—combined with increased intensity of use—will necessarily shift demand onto public streets used by residents and coastal visitors. The City's failure to analyze this cumulative condition is inconsistent with CEQA and renders its conclusions unsupported.

III. Coastal Act and Density Bonus Violations

Appeal Finding 5 – The City Failed to Properly Apply and Harmonize the State Density Bonus Law with the Coastal Act

The City's determination repeatedly asserts that the project is entitled to Density Bonus incentives and waivers and, on that basis, concludes that the resulting deviations from the Venice Coastal Zone Specific Plan and LUP are permissible. However, the determination fails to apply the controlling requirement under State Density Bonus law that such provisions must be interpreted and applied in a manner consistent with the Coastal Act.

Government Code § 65915(m) expressly provides:

"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 (Division 20 (commencing with Section 30000) of the Public Resources Code)."

This language is not discretionary. **It imposes an affirmative obligation on the City to ensure that Density Bonus incentives and waivers do not override or conflict with Coastal Act protections. Instead, the City must harmonize the two statutory schemes.**

The CPC determination does not perform this analysis. Instead, it treats eligibility for Density Bonus incentives as effectively dispositive. For example, the determination states:

"the proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Venice Specific Plan…"

and further concludes that:

"the proposed Density Bonus project meets the requirements of Density Bonus State Law… and therefore complies with the applicable policies of the Coastal Act."

This reasoning is legally flawed. Compliance with Density Bonus law does not establish compliance with the Coastal Act. The statute requires the opposite: that Density Bonus be applied **within the constraints of the Coastal Act**, not in lieu of it.

The City's failure to reconcile the project's extraordinary deviations—nearly doubling FAR, increasing height by over 70%, eliminating setbacks, and removing step backs—with Coastal Act protections renders its findings legally deficient. There is no analysis of whether these deviations adversely affect coastal resources, public access, or neighborhood character, as required by Coastal Act Chapter 3.

Because the City failed to apply Government Code § 65915(m), it did not proceed in the manner required by law, and its approval must be reversed.

Appeal Finding 6 – The Project Violates Coastal Act Section 30251 (Visual Resources and Community Character)

The CPC determination concludes that the project is "visually compatible" with the surrounding area despite acknowledging that it dramatically exceeds the prevailing scale. The determination admits:

"the average height of the immediate area is approximately 21.9 feet… [and] 1.8 stories… [while] the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches."

Despite this, the City concludes the project is compatible based on selective comparisons to scattered taller structures and generalized statements about "eclectic character." **This conclusion is unsupported and inconsistent with Coastal Act requirements.**

Coastal Act Section 30251 provides:

"The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to… be visually compatible with the character of surrounding areas… and… minimize the alteration of natural land forms."

The Venice LUP reinforces this mandate, requiring that new development:

"respect the scale and character of community development," and protect against excessive "bulk and mass."

The project does the opposite. The CPC approved:

- FAR increase from 1.5 to 2.96 (nearly double)
- Height increases from 30 feet to 52'10"
- Elimination of front setback entirely
- Reduction of side yards
- Removal of step backs

These are not minor deviations — they fundamentally transform the scale and massing of the structure. The determination attempts to minimize this by characterizing the project as "functionally a four-story structure," but this is contradicted by the approved height and mass.

Moreover, the City's reliance on isolated examples of taller buildings does not satisfy Coastal Act requirements. The proper standard is **compatibility with the surrounding area**, not whether some larger buildings exist elsewhere.

The record establishes that the immediate context consists primarily of one- to three-story buildings. The project is therefore **out of scale with its surroundings**, and the City's conclusion to the contrary is not supported by substantial evidence.

Appeal Finding 7 – The Project Violates Coastal Act Section 30252 (Public Access and Parking)

The CPC determination concludes that the project will not adversely affect coastal access, relying heavily on proximity to transit and a Parking Demand Management Assessment. However, this conclusion is unsupported and internally inconsistent.

Coastal Act Section 30252 provides that:

"The location and amount of new development should maintain and enhance public access to the coast by… (4) providing adequate parking facilities or providing substitute means of serving the development…"

The determination acknowledges that:

"the Venice Coastal Zone Specific Plan would otherwise require 118 spaces"

yet approves only 28 spaces — a deficit of 90 spaces. This is a massive shortfall in a coastal area already experiencing constrained parking conditions.

The City attempts to justify this through AB 2097, stating that parking cannot be required due to proximity to a "Major Transit Stop." However, this reasoning is flawed for two reasons:

(1) Coastal Act Supremacy

The Coastal Act is a voter-enacted statute that takes precedence over conflicting local or state laws where coastal resources are at issue. The City cannot rely on AB 2097 to avoid Coastal Act obligations.

(2) Failure to Demonstrate Adequate Substitute Measures

Even if parking reductions are permissible, Section 30252 requires **either adequate parking OR effective substitutes**. The City provides neither. The determination relies on generalized claims of available parking and transit access, but provides no enforceable mitigation measures, no binding transportation demand management program, and no evidence that the identified "available capacity" will remain available after project buildout.

The determination also ignores the project's restaurant use, which generates peak demand during evenings and weekends—precisely when coastal access demand is highest.

By failing to ensure adequate parking or enforceable substitutes, the project shifts parking demand onto public streets used by beach visitors and residents, thereby impairing coastal access in violation of Section 30252.

Appeal Finding 8a – The City Failed to Properly Analyze and Mitigate Safety and Access Impacts Under Coastal Act Section 30253

The CPC determination asserts that the project complies with Coastal Act Section 30253, yet provides no meaningful analysis of safety impacts associated with site access.

Section 30253 requires that new development:

"minimize risks to life and property" and
"assure stability and structural integrity" and
"protect special communities and neighborhoods…"

The determination acknowledges that:

"all vehicle access shall be provided from the rear alley."

However, it fails to analyze whether that 14' wide alley can safely accommodate:

- Residential traffic
- Restaurant patrons
- Delivery vehicles
- Trash collection
- Emergency access

There is no analysis of turning movements, no evaluation of emergency vehicle access, and no discussion of conflicts between multiple vehicles or vehicles and pedestrians.

Instead, the City simply concludes that no adverse impacts will occur, without providing supporting evidence. This is precisely the type of conclusory finding rejected in *Topanga Assn. v. County of Los Angeles*, which requires agencies to articulate a clear analytical connection between facts and conclusions.

Given the known constraints of Venice alleys and the intensity of the proposed uses, there is substantial evidence that the project creates safety risks. The City's failure to analyze these risks violates both CEQA and Coastal Act § 30253.

Appeal Finding 8b – The Project Violates Coastal Act Section 30253(e) and Venice LUP Policy I.E.1 by Degrading Venice's Designation as a Special Coastal Community

The City's determination fails to analyze or address the project's impact on Venice's designation as a Special Coastal Community, despite this being a core policy of the certified Venice Land Use Plan ("LUP") and a requirement under the Coastal Act Chapter 3. The LUP expressly provides under Policy I.E.1 (Preservation of Venice as a Special Coastal Community) that: "Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976." The LUP further defines a "Special Coastal Community" (at p. I-16) as "an area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast." ***These provisions impose an affirmative obligation on the City to ensure that new development protects—not degrades—the distinctive historical, cultural, and architectural qualities that justify Venice's designation.***

The project site is located within the Lost Venice Canals Historic District, a formally recognized historic resource that embodies the very "cultural, historical, [and] architectural heritage" identified in the LUP's definition of a Special Coastal Community. Evidence establishing this fact was submitted to the City Planner by the Venice Neighborhood Council and others, yet the CPC Staff Report and the CPC determination fail to acknowledge, analyze, or respond to this information. This omission is not merely procedural; it reflects a substantive failure to evaluate whether the project is consistent with the Coastal Act and the LUP's central policy mandate to preserve Venice's defining character.

The approved project, which significantly exceeds applicable height, massing, and scale limitations and departs from multiple LUP and Specific Plan standards, introduces a level of intensity and visual intrusion that is incompatible with the historic and architectural context of the Lost Venice Canals Historic District. By allowing a project that is so substantially out of scale and character with its surroundings, the City has failed to protect the very qualities that define Venice as a Special Coastal Community. This degradation is not an abstract concern. The continued recognition of Venice as a Special Coastal Community depends on the preservation of its historic and cultural resources; incremental erosion of those resources through incompatible development undermines the basis for that designation.

Coastal Act Section 30253(e) requires that new development "protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses." ***The City's determination contains no analysis*** demonstrating how the project protects the Lost Venice Canals Historic District or Venice's broader identity as a Special Coastal Community. Instead, the approval facilitates development that diminishes those characteristics. By failing to evaluate and ensure consistency with LUP Policy I.E.1 and Coastal Act Section 30253(e), the City has not proceeded in the manner required by law, and its finding of Coastal Act consistency is unsupported by substantial evidence.

Appeal Finding 9 – The City's Coastal Act Consistency Finding Is Internally Contradictory and Unsupported

The CPC determination repeatedly asserts that the project "will not have a significant adverse impact on coastal resources" while simultaneously acknowledging:

- Significant deviations from development standards
- A major parking deficit
- Increased density and intensity of use
- Location in a constrained coastal area

For example, the determination states:

"the project will not have a significant adverse impact on coastal resources"

yet provides no substantial evidence supporting that conclusion beyond generalized assertions.

The Coastal Act requires a **substantive evaluation of impacts**, not conclusory statements. The City's findings fail to:

- Quantify impacts
- Address conflicting evidence
- Reconcile inconsistencies in the record

As a result, the determination does not "bridge the analytic gap" required under *Topanga*, and cannot support approval.

IV. Mello Act Violations

Appeal Finding 10 – The City Misapplied the Mello Act by Failing to Properly Evaluate the Loss of Residential Use and Coastal Housing Protections

The City's approval includes a Mello Act Compliance Review pursuant to Government Code §§ 65590 and 65590.1. However, the City's findings fundamentally misinterpret and misapply the requirements of the Mello Act.

The Mello Act provides, in relevant part:

"The conversion or demolition of any residential structure for purposes of a nonresidential use which is not coastal-dependent… shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location." (Gov. Code § 65590(b))

The statute is clear: residential use is to be protected and preserved in the Coastal Zone, and demolition for purposes of non-residential or mixed-use is strictly prohibited.

Here, the project proposes demolition of two residential structures and replacement with a mixed-use development that includes a substantial restaurant component. While the City characterizes the project as residential with commercial uses, the inclusion of nearly 3,700 square feet of restaurant use represents a significant shift toward commercial intensity.

The CPC determination does not make the required finding that continued residential use is infeasible. Instead, it focuses narrowly on whether the existing units were rented at "affordable" levels:

"the unit was rented at above affordable levels… therefore no affordable units exist on site."

This analysis is legally insufficient. The Mello Act does not limit its protections to "affordable" units only; it protects existing residential use broadly, with additional protections for affordable housing. The City improperly conflates the replacement housing requirements with the threshold

The determination also makes the claim on page F-22 that the parcel at 1410 South Main has "been a vacant lot since March 2018" however this claim is false. That lot was filled with a series of unpermitted shipping containers to form a live/workspace on the parcel for many years. This is an overhead picture of the lot taken in June 2021:



You can clearly see that instead of a "vacant lot" 1410 South Main Street was used as an unpermitted live/workspace.

In addition, the project involves consolidation of three lots, which the LUP cautions against where it would alter neighborhood scale and character. The City's approval fails to address the fact that the project is grossly incompatible with the character, mass, scale, and intensity of the surrounding area. The LUP also requires that adequate parking be provided, which is not. Thus, three lot consolidation cannot be allowed.

By failing to determine whether residential use remains feasible—and by allowing replacement of a residential structure with commercial use in the Coastal Zone—the City violated the Mello Act.

V. CEQA Violations

Appeal Finding 11 – The City Improperly Relied on a Categorical Exemption Despite Substantial Evidence of Significant Impacts

The City determined that the project is categorically exempt under CEQA Guidelines §§ 15301 (Class 1) and 15332 (Class 32). This determination is unsupported and contrary to law.

Under CEQA Guidelines § 15300.2, categorical exemptions do not apply where there are:

- A reasonable possibility of a significant environmental effect
- Cumulative impacts
- Unusual circumstances

- Impacts on scenic resources or historical resources

A. Traffic and Circulation Impacts Were Improperly Ignored

The determination states:

"the project does not exceed the threshold criteria… for preparing a traffic study"

This conclusion is fundamentally flawed because the City's traffic analysis excluded key trip-generating uses — most notably the restaurant component.

The project includes:

- 3,676 square feet of restaurant use
- Indoor and outdoor dining
- A location on a high-demand coastal corridor

Restaurant uses generate significantly higher peak-hour trips than residential uses, particularly during evenings and weekends. Excluding these uses from the trip generation analysis artificially suppresses projected impacts.

Under CEQA, agencies must consider the whole of the project, not selectively exclude components. (CEQA Guidelines § 15378.)

The failure to include restaurant trips invalidates the City's conclusion that no traffic study was required.

B. Cumulative Impacts Were Not Properly Evaluated

CEQA Guidelines § 15300.2(b) provides:

"A categorical exemption shall not be used when the cumulative impact of successive projects of the same type in the same place… is significant."

The determination dismisses cumulative impacts without meaningful analysis, stating:

"the project will not result in significant cumulative impacts."

This conclusion ignores:

- Multiple recent and pending developments in the Venice Coastal Zone
- Increased intensity of mixed-use and restaurant development
- Existing parking and circulation constraints

Cumulative impacts must be evaluated in the context of existing and foreseeable development, not in isolation. The City's failure to conduct this analysis violates CEQA.

C. The Project Presents "Unusual Circumstances"

CEQA Guidelines § 15300.2(c) bars exemptions where:

"there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances."

This project presents multiple unusual circumstances:

- Nearly doubling allowable FAR
- Height increase exceeding 70%

- Significant parking reduction in a coastal zone
- Intensification of commercial uses in a mixed-use project
- Alley-only access serving both residential and restaurant uses

These factors distinguish the project from typical infill development and create a reasonable possibility of significant impacts.

D. Coastal Zone Location Requires Heightened Scrutiny

The project is located within the Coastal Zone, an environmentally sensitive and highly regulated area. Courts have recognized that projects in sensitive locations are less likely to qualify for categorical exemptions.

The City's reliance on a categorical exemption—without preparing even an Initial Study—fails to account for the heightened protections required in the Coastal Zone.

Appeal Finding 12 – The City's CEQA Findings Lack Substantial Evidence

Under Public Resources Code § 21080(c), an exemption is only valid where there is **no substantial evidence** supporting a fair argument of significant impacts.

Here, substantial evidence exists in the record demonstrating:

- Traffic and circulation impacts
- Parking deficiencies affecting coastal access
- Incompatibility with neighborhood scale
- Safety concerns related to alley access

Because substantial evidence exists, the City was required to prepare at least an Initial Study, and likely an Environmental Impact Report.

The failure to do so constitutes reversible error.

VI. Procedural Errors and Defective Findings in Staff Report and Determination Letter

Appeal Finding 13 – The City Failed to Respond to Contrary Evidence in the Record

An agency must respond to and address conflicting evidence. (*Topanga Assn. v. County of Los Angeles* (1974) 11 Cal.3d 506.)

Here, the record contains substantial evidence raising concerns regarding:

- Traffic impacts
- Parking and coastal access
- Neighborhood compatibility
- Mello Act compliance

The CPC determination does not meaningfully address these concerns. Instead, it relies on conclusory statements and generalized assertions.

This failure renders the findings legally inadequate.

Appeal Finding 14 – The Findings Are Internally Inconsistent and Factually Wrong

The determination simultaneously:

- Acknowledges the project significantly exceeds neighborhood scale
- Claims it is "compatible"
- Recognizes a 90-space parking deficit
- Concludes no parking impacts will occur
- Says that the Marina Freeway is "accessible within 1.5 miles of the project site." It is not; it is 2.4 miles according to Google Maps.
- Twice (on page F8 and F9) states that "the adjoining property to the north… is improved with two one-story single-family dwellings constructed in 1921 and 1952." It is not; it is a 3-story apartment building and 2-story fourplex built in 1911 and 1912 (202 and 208 Horizon Avenue).
- Claims that there is an "unnamed alley" behind the property when there is a street sign clearly labeling it as Toledo Court.
- Claims that the project is consistent with the Venice LUP and Specific Plan when it is not.
- Claims that 1410 Main Street has been a vacant lot since 2018 when there are pictures proving otherwise.

These contradictions demonstrate a lack of reasoned analysis and undermine the validity of the findings.

Appeal Finding 15 – The City Failed to Proceed in the Manner Required by Law

Under Code of Civil Procedure § 1094.5, a decision must be set aside where the agency:

- Has not proceeded in the manner required by law
- Has made findings not supported by substantial evidence

The City failed to:

- Properly apply the Coastal Act
- Harmonize Density Bonus law with Coastal Act requirements
- Conduct adequate CEQA review
- Properly apply the Mello Act

Each of these constitutes an independent basis for reversal.

VII. Appellant's Aggrievement

Appellant is aggrieved by the City's approval because the project will:

- Degrade neighborhood character and scale
- Exacerbate parking and circulation impacts
- Impair coastal access
- Set a precedent for overdevelopment in the Coastal Zone
- Undermine Coastal Act protections

As a resident, stakeholder, and participant in the public process, Appellant has a direct and substantial interest in ensuring lawful and compliant land use decisions.

VIII. Conclusion and Request for Relief

For the foregoing reasons, the City Planning Commission's approval of the Project is legally defective and unsupported by substantial evidence.

The City Council must:

1. **Grant the appeal in its entirety;**
2. **Reverse the approval of the Coastal Development Permit, Project Compliance, and Mello Act Determination;**
3. **Set aside the CEQA categorical exemption; and**
4. **Remand the project for full environmental review and reconsideration consistent with the Coastal Act, CEQA, and applicable law.**

In the alternative, the City Council should require substantial project redesign to ensure compliance with:

- Coastal Act Chapter 3
- Venice Land Use Plan policies
- Mello Act requirements
- CEQA

Exhibit Index

Exhibit	Description	Reference in Appeal
A	CPC Determination Letter (Signed)	Appeal Finding 1, 2
B	CPC Staff Report	Findings 1–5, 7
C	LUPC Draft Report	Findings 2–6
D	LUPC Final Recommendations	Findings 2–6
E	Venice Neighborhood Council Letters	Findings 2–6
F	Rick Garvey CPC Public Comment	Findings 3, 4
G	Rebuttal Letter to City Determination	Findings 3–6
H	Revised Plans (Jan 29, 2026)	Findings 1, 2, 5–7
X	Drone Photo – Vacant Lot Live/Work Shipping Containers	Findings 1, 3, 4, 6

APPENDIX

LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: APRIL 20, 2026

Case No.: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA Council District: 11 – Park
CEQA: ENV-2021-2021-CE
Plan Area: Venice

Project Site: 1410 – 1422 South Main Street

Applicant: Three on the Tree LLC, Brittany Teagues
Representative: Tony Russo, Crest Real Estate

At its meeting **March 12, 2026**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

Demolition of two single-family dwellings, and the construction of a 26,889 square-foot, five story, mixed-use building consisting of 20 residential units, of which four residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level-subterranean garage; and a roof deck with a solar trellis and a roof access structure, providing 28 parking spaces.

1. **Determined**, based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Sections 15301 and 15332 and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approved**, pursuant to Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC), a Density Bonus/Affordable Housing Incentive Compliance Review for a Housing Development Project comprised of 20 dwelling units, of which four dwelling units will be set aside for Very Low Income Households, with the following Off-Menu Incentives and Waivers of Development Standards:
   a. An Off-Menu Incentive to allow a Floor Area Ratio (FAR) increase of 97.3 percent resulting in a FAR of 2.96, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3;
   b. An Off-Menu Incentive to allow a northwesterly side yard of five feet in lieu of eight feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;
   c. An Off-Menu Incentive to allow a southeasterly side yard of 5 feet in lieu of eight feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;
   d. An Off-Menu Incentive to allow a zero-foot front yard setback for residential floor area, in lieu of five feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a);
   e. A Waiver of Development Standards to allow a maximum building height of 52 feet 10 inches, in lieu of 30 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3;
   f. A Waiver of Development Standards to remove the step back provisions, in lieu a 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F(3)(a); and

g. A Waiver of Development Standards to allow a Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C;

3. **Approved**, pursuant to LAMC Chapter 1A Section 13B.9.1, a Coastal Development Permit for the Proposed Project on a lot located within the Single Permit Jurisdiction of the Coastal Zone;
4. **Approved**, pursuant to LAMC Chapter 1A Section 13B.4.2, a Project Compliance for the Proposed Project on a lot located within the North Venice Subarea of the Venice Coastal Zone Specific Plan;
5. **Approved**, 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 the demolition of two residential units and the construction of 20 Residential Units in the Coastal Zone;
6. **Adopted** the attached Conditions of Approval; and
7. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Zamora
Second: Saitman
Ayes: Chavez, Choe, Diaz, Johnson, Klein, Lawshe, Rosenstein

Vote: 9 – 0



Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

APPEAL PERIOD - EFFECTIVE DATE

The decision of the Los Angeles City Planning Commission as it relates to the Density Bonus Off-Menu Incentives and Waivers of Development Standards are not further appealable. The remaining entitlements are appealable to City Council within **15 days** after the mailing date of this determination letter. Any appeal not filed within the 15-day period shall not be considered by the Council.

Appeal of Coastal Development Permit. The proposed development is in the Single Permit Jurisdiction Area of the Coastal Zone. Pursuant to LAMC Section 13B.9.1.G.1.f., no fee shall be charged for appeals of a Coastal Development Permit.

Provided no appeal has been filed by the noted date, a copy of the permit will be sent to the California Coastal Commission, pursuant to Section 13B.9.1.D.4 of Chapter 1A of the Los Angeles Municipal Code. Unless an appeal is filed with the California Coastal Commission before 20 working days have expired from the date the City's determination is deemed received by such Commission, the City's action shall be deemed final. As further stipulated in California Code of Regulations Section 13313, the permit shall not become effective until the requirements of Public Resources Code (PRC) Section 30601 have been fulfilled.

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 13B.9.1.I.2 of Chapter 1A of the Los Angeles Municipal Code, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

FINAL APPEAL DATE: MAY 5, 2026

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

HOW TO FILE AN APPEAL

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below:

Forms are available online at http://planning.lacity.gov/development-services/forms.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

QR Code to Online Appeal Filing

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely online. Appeal fees may be paid for by credit card or e-check.

IN PERSON APPEAL FILINGS

QR Code to Forms for In-Person Appeal Filing

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays only, and payment can be made by credit card or check.

a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications;
b. Alternatively, appeal applications can be filed with staff at DSC public counters.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa St 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Blvd Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org

South LA DSC *Tuesday and* *Thursday Only*	8475 S. Vermont Ave, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

DETERMINATION EFFECTIVE DATE

This determination will become effective after the end of the appeal period date on the first page of this document unless an appeal is filed with the Department of City Planning.

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).

SCHEDULING CASE CONDITION CLEARANCE AND BUILDING PERMIT SIGN-OFFS

QR Code to BuildLA Appointment Portal for Condition Clearance

In order to clear conditions and/or obtain building permit sign-offs, you must make an appointment with the Department of City Planning's Development Services Center (DSC). You may schedule a Case Condition Clearance Appointment with the DSC at appointments.lacity.org after the effective date of the determination..

See instructions on how to prepare for your appointment at planning.lacity.gov/project-review/case-filings

Attachments: Conditions of Approval, Amended Findings

cc: Juliet Oh, Senior City Planner
Ira Brown, City Planner
Sienna Kuo, Assistant Planner

CONDITIONS OF APPROVAL

Density Bonus Conditions

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped Exhibit "A" attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.

2. **Residential Density.** The project shall be limited to a maximum density of 20 dwelling units, including On-Site Restricted Affordable Units.

3. **On-site Restricted Affordable Units.** Four (4) units shall be reserved for Very Low Income Household Occupancy as defined by the State Density Bonus Law per Government Code Section 65915 and by the Los Angeles Housing Department (LAHD). In the event the RPO Replacement Unit condition requires additional affordable units or more restrictive affordability levels; the most restrictive requirements shall prevail.

4. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Sections 12.22 A.25 and State Density Bonus Law (Government Code Section 65915).

5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to make four (4) units available to Very Low-Income Households or equal to 16 percent of the project's total base residential density allowed, for sale or rental, as determined to be affordable to such households by LAHD for a period of 99 years. In the event the applicant reduces the proposed density of the project, the number of required reserved on-site Restricted Units may be adjusted, consistent with LAMC Section 12.22 A.37, to the satisfaction of LAHD, and in consideration of the project's Replacement Unit Determination. Enforcement of the terms of said covenant shall be the responsibility of LAHD. The applicant shall present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the LAHD.

   Unless otherwise required by state or federal law, the project shall provide an onsite building manager's unit, which the owner shall designate in the covenant. The Owner may not use an affordable restricted unit for the manager's unit.

6. **Rent Stabilization Ordinance (RSO).** Prior to the issuance of a Certificate of Occupancy, the owner shall obtain approval from LAHD regarding replacement of affordable units, provision of RSO Units, and qualification for the Exemption from the Rent Stabilization Ordinance with Replacement Affordable Units in compliance with Ordinance No. 184,873. In order for all the new units to be exempt from the Rent Stabilization Ordinance, the applicant will need to either replace all withdrawn RSO units with affordable units on a one-for-one basis or provide at least 20 percent of the total number of newly constructed rental units as affordable, whichever

results in the greater number. The executed and recorded covenant and agreement submitted and approved by LAHD shall be provided.

7. **Floor Area Ratio (Off-Menu Incentive).** The project is allowed a maximum FAR of 2.96.

8. **Side Yard Setback – Northwesterly (Off-Menu Incentive).** The project is allowed a minimum northwesterly side yard setback of 5 feet.

9. **Side Yard Setback – Southeasterly (Off-Menu Incentive).** The project is allowed a minimum southeasterly side yard setback of 5 feet.

10. **Front Yard Setback – Residential (Off-Menu Incentive**). The project is allowed a zero-foot front yard setback for residential floor area.

11. **Height (Waiver)** – The building shall not exceed a maximum Flat Roof height of 52 feet,10 inches as measured from the midpoint of the centerline of Main Street to the highest point of the roof.

12. **Step-Back (Waiver) –** The front 45-degree step back plane is removed.

13. **Roof Access Structure (Waiver)** – The building is allowed a Roof Access Structure with a maximum exterior dimension of 176 square feet.

14. **Parking and Access**. As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide 28 parking spaces onsite; all vehicle access shall be provided from the rear alley.

    a. Residential Parking – 24 parking spaces shall be provided for the residential units.

    b. Commercial Parking - 4 parking spaces shall be provided for the commercial uses.

15. **Parking Per AB 2097.** The project shall be permitted to provide a minimum of zero automobile parking spaces pursuant to AB 2097. Twenty-eight automobile parking spaces are provided.

16. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC Section 12.21 A.16. As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide 45 bicycle spaces onsite.

17. **Adjustment of Parking**. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including the Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.

18. **Electric Vehicle Parking.** All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC. Any parking spaces provided

above LAMC requirements shall be provided with EV chargers to immediately accommodate electric vehicles within the parking areas.

Coastal Development Permit Conditions

19. **Single Permit Jurisdiction Area.** The project is located within the Single Permit Jurisdiction area of the California Coastal Zone. Pursuant to LAMC Section 13B.9.1.D.4, the decision of the permit granting authority, or any appeal body to approve issuance of a permit shall not be deemed to be final and no Coastal Development Permit may be issued until 20 working days have expired from the date said notice of permit issuance is deemed received by said Executive Director and without an appeal having been taken to the Coastal Commission. Prior to the issuance of any permits, the applicant shall provide a copy of the Coastal Commission's Notification that the City's coastal development permit is effective.

20. **Front Façade (Articulation).** The front façade of the structure shall be articulated as shown in "Exhibit A."

21. **Commercial Floor Area.** The project shall be limited to 656 square feet of office use and 3,676 square feet of restaurant uses providing 2,098 square feet of Service Floor area and 467 square feet of outdoor Service Floor area.

22. **Street Wall.** The project shall provide the required Street Wall for the portions of the structure fronting Main Street. The Street wall shall extend for at least 65 percent of the length of the Building Frontage, be set back zero feet from the building line, and maintain a minimum height of 13 feet, as shown on Exhibit A.

23. **Ground Floor.** At least 50 percent of the area of the Ground Floor Street Wall of the Project shall be devoted to pedestrian entrances, display windows or windows offering views into restaurant or lobby space, as shown on Exhibit A.

24. **Roof Structures.** Chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the height limit by a maximum of five feet.

Additional Entitlement Conditions.

25. **Street Trees.** Street trees shall be provided to the satisfaction of the Urban Forestry Division. Street trees may be used to satisfy on-site tree requirements pursuant to LAMC Article Section 12.21.G.3 (Chapter 1, Open Space Requirement for Six or More Residential Units).

    Required Trees per 12.21 G.2. As conditioned herein, a final submitted landscape plan shall be reviewed to be in substantial conformance with Exhibit "A." There shall be a minimum of four (4) 24-inch box, or larger, trees on site pursuant to LAMC Section 12.21 G.2. Any required trees pursuant to LAMC Section 12.21 G.2 shown in the public right-of-way in Exhibit "A" shall be preliminarily reviewed and approved by the Urban Forestry Division prior to building permit issuance. In-lieu fees pursuant to LAMC Section 62.177 shall be paid if placement of required trees in the public right-of-way is proven to be infeasible due to City determined physical constraints.

26. **Landscape Plan.** Revised landscape plans shall be submitted to show the size and location of all plants. The landscape plan shall indicate landscape points for the Project as required by

Los Angeles Municipal Code (LAMC) 12.40 and Landscape Ordinance Guidelines "O". All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be landscaped, including an automatic irrigation system, and maintained in accordance with a final landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning. The final landscape plan shall be in substantial conformance with the submitted Landscape Plan, Exhibit "A," and shall incorporate any modifications required as a result of this grant.

27. **Stormwater/irrigation** – The project shall implement on-site stormwater infiltration as feasible based on the site soils conditions, the geotechnical recommendations, and the City of Los Angeles Department of Building and Safety Guidelines for Storm Water Infiltration. If on-site infiltration is deemed infeasible, the project shall analyze the potential for stormwater capture and reuse for irrigation purposes based on the City Low Impact Development (LID) guidelines.

28. **Solar**. The Project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

29. **Solar and Electric Generator.** Generators used during the construction process shall be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.

30. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, Environmental Sensitive Areas, the public right-of-way, nor from the above.

31. **Trash.** Separate trash collection areas for residential and commercial trash collection shall be maintained and shall also accommodate the separate collection of recyclable trash. The separate trash collection areas shall be clearly identified on final plans submitted for review and sign-off.

32. **Graffiti**. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

Administrative Conditions

33. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building & Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building & Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building & Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

34. **Notations on Plans.** Plans submitted to the Department of Building & Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

35. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

36. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

37. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety for purposes of having a building permit issued at any time during the term of this grant.

38. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

39. **Department of Building & Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building & Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building & Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

40. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

41. **Expiration**. In the event that this grant is not utilized within three years of its effective date (the day following the last day that an appeal may be filed), the grant shall be considered null and void. Issuance of a building permit, and the initiation of, and diligent continuation of, construction activity shall constitute utilization for the purposes of this grant.

42. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including <u>but not limited to</u>, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

(As Amended by the City Planning Commission at its meeting on March 12, 2026)

Entitlement Findings

Density Bonus/Affordable Housing Incentives Compliance Findings

1. **Pursuant to Government Code Section 65915 and LAMC Section 12.22 A.37, the Commission shall approve a density bonus and requested incentive(s)/waiver(s) unless the Commission finds that:**

   a. **The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c).**

   The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested incentives do not result in identifiable and actual cost reduction to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low-, low-, and moderate-income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

   Based on the set-aside of 16 percent of 20 base units for Very Low Income and Low Income Households, the applicant is entitled to four (4) Incentives under both Government Code Section 65915 and the Los Angeles Municipal Code (LAMC). The request for an increase in Floor Area Ratio (FAR), decrease in northwesterly and southeasterly side yard setbacks, and decrease in residential front yard setback qualify as requested incentives. The remaining requests allow an increase in the allowable height, removal of front façade step back provisions, and the increase in allowable square footage of the Roof Access Structure are Waivers of Development Standards.

   Floor Area Ratio (Off-Menu Incentive) – An Off- Menu Incentive to allow a FAR of 2.96:1 in lieu of a FAR of 1.5:1, as otherwise required by the Venice Coastal Zone Specific Plan 11.B.3. Commercially zoned lots within the Venice Coastal Zone Specific Plan are allowed a FAR equal to 1.5 square feet of building floor area to each (1) square foot of buildable lot area for mixed use buildings.

   Should the project adhere to the allowable FAR in the C2-1 zone, its total square footage would be limited to 13,635 square feet. The Off-Menu Incentive to increase the FAR by 97.3 percent would allow an increase of 13,254 square feet for a total of 26,889 square feet, which would accommodate a larger construction envelope to provide additional affordable units and additional market rate units. The ability to develop larger building or more units will increase the revenues from the market-rate floor area, which will lower the marginal cost of developing and operating the affordable units. The requested incentive allows the developer to expand the building envelope so that additional units can be

constructed, and the overall space dedicated to residential uses is increased. These Incentives support the Applicant's decision to provide four (4) affordable units for Very Low-Income Households.

Side Yard Setback – Northwesterly (Off-Menu Incentive). An Off-Menu Incentive to allow a reduced northwesterly side yard setback of 5 feet in lieu of the required 8-foot side yard setback, as otherwise required in the C2 Zone pursuant to LAMC Section 12.11.C.2. Off-Menu incentives are permitted a 37.5 percent reduction in the north-westerly side yard setback.

The applicant requests a reduction of three feet in northwesterly side yard to allow for efficient floor plates that maintain adequate light, air, and privacy through upper-level plane breaks and façade articulation, while avoiding structural inefficiencies that would increase cost and reduce the number of feasible residential units, including a potential impact to the very low-income units.

Side Yard Setback – Southeasterly (Off-Menu Incentive). An Off-Menu Incentive to allow a reduced southeasterly side yard setback of 5 feet in lieu of the required 8-foot side yard setback, as otherwise required in the C2 Zone pursuant to LAMC Section 12.11.C.2. Off-Menu incentives are permitted a 37.5 percent reduction in the north-westerly side yard setback.

The applicant requests a reduction of three feet in northwesterly side yard to allow for efficient floor plates that maintain adequate light, air, and privacy through upper-level plane breaks and façade articulation, while avoiding structural inefficiencies that would increase cost and reduce the number of feasible residential units, including a potential impact to the very low-income units.

Front Yard Setback (Off-Menu Incentive). An Off-Menu Incentives to allow a 100% decrease in front yard setback for residential floor area to allow 0 foot, 0 inch, in lieu of the required 5 feet as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.4.

Residential portions of a mixed-use structure are required to adhere to LAMC requirements, however, no less than 5 feet according to the Venice Coastal Zone-Specific Plan. Removal of the front yard setback will allow for the structure to align with the established street wall and reinforce pedestrian orientation and façade articulation along Main Street without compromising the size of residential units. The project proposes providing 20 residential units, including four (4) Very Low Income affordable units. The additional square footage permitted by the reduction of the front yard setback decreases the marginal costs of providing the units reserved for Very Low Income households. If the building were to adhere strictly to the 5-foot front yard setback requirement in the C2-1-O Zone, the project would be limited in the size and/or number of units the project could provide, undermining the project's financial feasibility by increasing the marginal costs of providing the units reserved for Very Low Income households. The requested incentive will allow the developer to expand the building envelope so the additional units can be constructed and the overall space dedicated for residential uses increased.

b. The Incentive will have a Specific Adverse Impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the

Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec. 65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

As such, the project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed incentive(s) will have a specific adverse impact on public health and safety.

c. The incentives are contrary to state or federal law.

There is no substantial evidence in the record that the requested incentives are contrary to state or federal law.

2. Pursuant to Government Code Section 65915 and LAMC Section 12.22 A.37, the Commission shall approve a density bonus and requested waiver(s) unless the Commission finds that:

a. The Development Standard associated with a request for a Waiver will not have the effect of physically precluding the construction of a development meeting the eligibility criteria described in Paragraph (c) at the densities or with the Base Incentives and Additional Incentives permitted under this subdivision.

A project that meets the requirements of Government Code 65915 may request other "waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]" (Government Code Section 65915(e)(1)).

Therefore, the request for the following is recommended as Waivers of Development Standards. Without the below Waivers, the existing development standards would physically preclude development of the base units, build out of the incentives, and project amenities:

Height (Waiver) – A waiver to allow a 76.1 percent increase in total building height from the permitted 30 feet to 52 feet, 10 inches as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.a.

The project site is zoned C2-1-O with a Height District of 1, which provides for unlimited building height. However, the Venice Coastal Zone Specific Plan for the North Venice Subarea further limits building height to 30 feet for flat rooflines and 35 feet for varied rooflines. The proposed structure is functionally a four-story mixed-use structure, however due to the nature of the proposed solar trellis, the solar trellis functions as an additional floor. Compliance with the height limitations of the Specific Plan would reduce the solar trellis height and rooftop amenity dedicated to residential use. As such, the Off-Menu Incentive for increased height is necessary to accommodate a larger construction envelope to provide for the affordable units and market rate units. As with FAR, the ability to develop a larger building with more units will increase revenues from the market-rate units, which will lower marginal cost of developing and operating the affordable units, thereby making the project financially feasible. The requested incentive allows the developer to expand the building envelope so that the additional units can be constructed, solar trellis to abide by the Green Code, and increase the overall space dedicated to residential use.

Step Back Provisions (Waiver) – A Waiver to allow the removal of the step-back-provisions, in lieu of the 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

The required step back provisions would reduce the square footage and private open space provided for each unit. Compliance with the step-back requirement would substantially reduce the floor area and livable space for the residential portion of the mixed use structure, as proposed. Without the waiver, the applicant would be physically precluded from constructing some portion of the residential units. The requested waiver will allow the developer to expand the building envelope so the units can be constructed, and the overall space dedicated to residential use is increased.

Roof Access Structure (Waiver) – A Waiver to increase the maximum exterior dimension to 176 square feet in lieu of 100 square feet as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

The maximum permitted RAS of 100 square feet as measured from the exterior walls is typically permissible for a standalone residential structure, however, mixed use or multi-family structures require additional space for stair and elevator access. The Los Angeles Fire Department egress requirements and ADA accessibility to the rooftop amenities for all residents, including those with disabilities requires additional mechanical equipment and therefore, a larger roof access structure to accommodate.

b. The Waiver would have a Specific Adverse Impact as defined in California Government Code Section 65589.5(d)(2), upon public health and safety and for which there is no feasible method to satisfactorily mitigate or avoid the Specific, Adverse Impact. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec. 65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.

The project is not located on a substandard street in a Hillside area, Very High Fire Hazard Severity Zone, or any other special hazard area. Therefore, there is no substantial evidence that the proposed project and requested waivers would have a specific adverse impact on public health and safety.

c. The Waiver would have an adverse impact on any real property that is listed in the California Register of Historical Resources.

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

As such, the project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed waivers will have an adverse impact on public health and safety.

d. The Waiver would be contrary to state or federal law.

There is no substantial evidence in the record indicating that the requested waivers are contrary to any state or federal law.

3. Coastal Development Permit Findings

a. The development is in conformity with Chapter 3 of the California Coastal Act of 1976.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Venice Specific Plan, as follows:

- The increase allowable FAR to 2.96:1 in lieu of 1.5:1,
- The removal of the 5-foot residential front yard setback in lieu of 5 feet,
- The increase building height to 52 feet, 10 inches in lieu of 30 feet,

- The remove the step back provisions in lieu of a 45 degree step back plane break, and
- The increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet.

In addition, the proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the LAMC, as follows:

- Reduce the northwesterly side yard to allow 5 feet in lieu of 8 feet,
- Reduce the southeasterly side yard to allow 5 feet in lieu of 8 feet.

As discussed in Finding No. 1, the proposed Density Bonus project meets the requirements of Density Bonus State Law to be eligible for the density bonus, incentives, and waivers of development standards. In addition, the proposed development must also comply with the requirements of the Coastal Act. As provided in the findings below, the proposed development complies with the applicable policies of the Coastal Act and the Venice LUP.

Chapter 3 of the Coastal Act includes provisions that address the impact of development on public services, infrastructure, traffic, the environment and significant resources, and coastal access. Applicable provision are as follows:

Article 2 Public Access

Section 30211 Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) It is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) Adequate access exists nearby, or, (3) Agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The property is located within 250 feet from a Major Transit Stop at Main Street

and Market Street. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The project site is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone. Therefore, the proposed project will not interfere with or obstruct the public's right to access to coastal resources.

As such, the project conforms to the applicable Public Access policies of Chapter 3.

Article 5 Land Resources

Section 30240 requires the protection of environmentally sensitive habitat areas and to prevent significant impacts on such areas.

Section 30244 Archaeological and Paleontological Resources.
Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project includes a subterranean garage and will include the removal of 9,850 cubic yards of dirt.

Further, the project site is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of various types of land uses and the area is not located in an area identified to contain paleontological or archaeological resources. Any archaeological resources that may have existed near the project site surface are likely to have been disturbed or previously removed. However, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during project grading activities. If previously unknown archaeological resources are found during excavation and grading, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. If archaeological or paleontological resources are discovered during grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

Further, the project site is not identified in the Venice Land Use Plan as a site located within or adjacent to an Environmentally Sensitive Habitat Area (ESHA). The proposed development would be fully developed within the boundaries of the private lots and would not impact sensitive habitat areas. As such, the project conforms to the applicable Land Resources policies of Chapter 3.

Article 6 Development
Section 30250 Location; existing developed area.

(a) 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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

The project is located in an existing developed area surrounded by similar residential and commercial uses and will not have a significant adverse impact on coastal resources. Existing infrastructure servicing the existing residences will be used by the proposed development. Utility lines and water pipes will be connected to the proposed development. In addition, the project area is within the service area of the Los Angeles Fire Department Station 63 and the Pacific Division of the Los Angeles Police Department. Primary regional access is provided by the Marina Freeway, Venice Boulevard, and Lincoln Boulevard, which are all accessible within 1.5 miles of the Project Site.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish

an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources.

Section 30251 Scenic and Visual Qualities.
The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The architectural character of nearby development includes an eclectic mix of architectural styles including modern and contemporary style buildings. The project's proposed contemporary design fits into the architectural diversity of the neighborhood. The project height, massing and scale of the project is consistent with existing buildings along Main Street. As discussed above, the project would increase the maximum density for the subject site from six dwelling units to 20 dwelling units. The project would increase the maximum building envelope with a height increase of 22 feet and 10 inches, reduction in the residential front yard setback from 5 feet to 0 feet, reduction in the side yards from 8 feet to 5 feet, and increasing the FAR from 1.5:1 to 2.96:1. The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures

nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. Furthermore, the proposed increase in density is consistent with higher density permitted in the underlying adjacent multi-family residential zone and fits within a building envelope that is compatible with the surrounding area. The increase in density and provision of affordable housing in the Coastal Zone is consistent with the California Coastal Commission's policies for increasing housing and affordable housing in the Coastal Zone.

The project's consistency with development standards in the certified Venice LUP is important in assessing the project's compatibility with the character of the surrounding area. The certified Venice LUP states that the development standards also define for each land use designation a density of housing units and lot coverage to maintain the scale and character of existing residential neighborhoods and minimize the impacts of building bulk and mass." (LUP, p.II-2.)

The proposed development complies with Policy I.A.13 (Density Bonus Application) which allows for reduced restrictions for density, height and setback standards as outlined in Policies I.A.1, I.A.8, I.E.1, I.E.2, I.E.3 and II.A.3 of the Venice Land Use Plan (LUP), further discussed in Finding No. 3.b. As such, the proposed development is visually compatible with the character of the surrounding area and will further enhance the visual quality of the area.

Section 30252 Maintenance and Enhancement of Public Access.
The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that

the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions.

The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street and within 300 feet from the Windward Circle, a Major Transit stop within Venice. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants. The surrounding area is served by Big Blue Bus Route 1 located at the intersection of Main Street and Market Street, Culver City Bus Route No. 1 located at the intersection of Windward Avenue and Main Street, Los Angeles County Metropolitan Transit Authority (Metro) bus line 33 at the intersection of Main Street and Grand Boulevard.

Although the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. As demonstrated in the Parking Demand Management Assessment provided, empirical surveys demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

The proposed project is not located between the first public road and the sea and is located more than a half of a mile from the beach. The proposed project will not interfere with or obstruct the public's right to access to coastal resources. The proposed development will not have any adverse impacts on public access to the coast. No permanent structures will be placed within the public right-of-way and public access to the coast will not be obstructed. The proposed project will neither interfere nor reduce access to the shoreline as the site does not have direct access to any water or beach. As demonstrated in the

Parking Demand Management Assessment, the project will not have a significant adverse impact on coastal resources.

Section 30253 Minimization of Adverse Impacts.
New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The subject site is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, within 5 kilometers of the Santa Monica Fault, and within the Single Permit Jurisdiction of the Coastal Zone.

The project site is also located within an area that may be affected by Sea Level Rise. On August 12, 2015, the Coastal Commission adopted a Sea Level Rise Policy Guidance document, updated and adopted On November 14, 2024. This policy document provides a framework and directions for local jurisdictions to address sea level rise (SLR) in Local Coastal Programs (LCPs) and Coastal Development Permits (CDPs). In May 2018, the City completed an initial sea level rise vulnerability assessment for the Venice Coastal Zone. The report provides that: Existing wide beaches generally protect Venice from coastal hazards. Coastal assets along or near the beachfront are potentially vulnerable during a large storm event in combination with SLR greater than 3.3 feet. After 4.9 feet SLR, beachfront assets are more vulnerable to damage from flooding or potential erosion of the beach. A SLR of 6.6 feet is a tipping point for Venice's exposure to extreme coastal wave events. Beachfront and coastal assets could flood annually, beaches could be greatly reduced in width, and high water levels could greatly increase potential for flooding of inland low-lying areas. As discussed in the analysis, there is considerable uncertainty around the timing of SLR, how coastal processes may be affected, and what adaptation approaches will be applied in the future (VSLRVA, pg. 45). Policies and development standards to address the potential impacts of SLR would be addressed in the City's LCP for the Venice Coastal Zone.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed use would have no adverse impacts on public access, recreation, public views or the marine environment, as the property is located within a developed residential area and located a half mile from Venice Beach. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filling, or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed dwelling

will not block any designated public access views. As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

b. The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

Coastal Act Section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act. The Venice Local Coastal Land Use Plan ("LUP") was certified by the California Coastal Commission on June 14, 2001; however, the necessary implementation ordinances were not adopted. The City is in the initial stages of preparing the LCP; prior to its adoption the guidelines contained in the certified LUP are advisory. The subject site is located within the North Venice Subarea with a land use designation of Neighborhood Office Commercial and zoned C2-1-O.

The following are applicable policies from the certified Venice Land Use Plan:

Policy I. A. 9. *Replacement of Affordable Housing. Per the provisions of Section 65590 of the State Government Code, referred to as the "Mello Act", the conversion or demolition of existing residential units occupied by persons and families of low or moderate income shall not be permitted unless provisions have been made for replacement of those dwelling units which result in no net loss of affordable housing in the Venice Community in accordance with Section 65590 of the State Government Code (Mello Act).*

Policy I.A.10. *Location of Replacement Housing. The replacement units shall be located in one or more of the following areas, listed in order of priority: 1) on the site of the converted or demolished structure; 2) within the site's Venice coastal subarea; 3) within the Venice Coastal Zone; 4) within the Venice Community Plan area east of Lincoln Boulevard; and, 5) within a three mile radius of the affected site.*

Policy I.A.11. *Replacement Ratios for Replacement Units. Replacement ratios shall be at a minimum of 1:1 (one unit replaced for each unit removed). Replacement ratios shall increase according to how far from the affected site replacement units are located as defined in the Mello Act.*

Policy I.A.13. *Density Bonus Applications. Required replacement dwelling units shall be counted as reserved units in any related State mandated density bonus application for the same project.*

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project is subject to the requirement under the Housing Crisis Act (SB 330/SB8) and the City's Interim Administrative Procedures for Complying with the Mello Act (IAP). The Los Angeles Housing Department

(LAHD) issued an SB330/SB8 Replacement Unit Determination (RUD) dated October 29, 2025 requiring the replacement of one (1) affordable replacement unit and one (1) market rate unit. As such, the four (4) residential units will be set aside for Very Low Income Households satisfies this requirement. Finding No. 5 provides a full discussion of the requirements under the IAP.

Policy I.A.14. Parking Requirements for Affordable Housing. Reduced parking is permitted for low income units only if: a) the project is consistent with LUP policy I.A.13; and b) it is demonstrated that the prospective occupants of the project will have a reduced demand for parking. However, if a unit changes its status from low or low-moderate income to market rate unit, parking should be provided for market rate units according to the parking standards listed in LUP Policies II.A.3 and II.A.4.

On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

Further, the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. Empirical surveys, provided the Parking Demand Management Assessment, demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

Policy I.B.2. Mixed-Use Development. Mixed-use residential commercial development shall be encouraged in all areas designated on the Land Use Policy Map for commercial use. Residential density in commercial land use designations shall not exceed one unit per 800-1200 square feet of lot area and shall comply with the Floor Area Ratio (FAR) limits set forth in Policy I.B.7. The design of mixed-use development is intended to help mitigate the impact of the traffic generated by the development on coastal access roads and reduce parking demand by reducing the need for automobile use by residents and encouraging pedestrian activity. Such development shall comply with the density and development standards set forth in this LUP.

As discussed in Finding No 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24 U.26. The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Specific Plan, as follows: Increase allowable FAR to 2.96:1 in lieu of 1.5:1,

decrease the front yard setback for residential floor area to allow 0 feet, 0 inches in lieu of 5 feet, increase the overall height for a total building height of 52 feet, 10 inches in lieu of 30 feet maximum, remove the step back provisions in lieu of a 45 degree step back plane, and Increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet. As discussed in Finding No. 1, the project qualifies for the requested incentive and waiver. As such, the proposed development is visually compatible with the character of the surrounding area, proposed density bonus, incentives, and waivers are consistent with the applicable policies of the Coastal Act and Venice LUP

Preservation of Venice as a Special Coastal Community

Policy I.E.1. General. Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

Policy I.E.2. Scale. *New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer, and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.*

Policy I.E.3. Architecture. *Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.*

The proposed project is visually compatible with the character of surrounding areas and sited and designed to protect coastal visual resources. The neighborhood and surrounding properties are developed with multi-family dwellings and commercial structure with zoning classifications of C2-1-O, RD1.-1-O, and C4-1. Surrounding properties include single and multi-story commercial structures and single and multi-story residential structures.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The property is developed with a three-story apartment and a two story fourplex, constructed in 1911 & 1912. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the requested 22 feet, 10 inches above the permitted flat roof height will **not be** materially detrimental to the adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates

articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

Policy II.C.1. General Non-Vehicular Coastal Access Policy. Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.

The proposed project will provide 28 vehicular parking spaces and 45 bicycle parking spaces. The subject site is located within a half mile of a Major Transit Stop, Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The proposed five story, mixed use structure is consistent with the policies of the Certified Venice Land Use Plan and the standards of the Venice Coastal Zone Specific Plan. The project will not prejudice the ability of the City to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act.

c. The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination.

The Los Angeles County Interpretive Guidelines were adopted by the California Coastal Commission (October 14, 1980) to supplement the Statewide Guidelines. Both regional and statewide guidelines, pursuant to Section 30620 (b) of the Coastal Act, are designed to assist local governments, the regional commissions, the commission, and persons subject to the provisions of this chapter in determining how the policies of this division shall be applied to the coastal zone prior to the certification of a local coastal program.

As stated in the Regional Interpretive Guidelines, the guidelines are intended to be used "in a flexible manner with consideration for local and regional conditions, individual project parameters and constraints, and individual and cumulative impacts on coastal resources". In addition to the Regional Interpretive Guidelines, the policies of the Venice Local Coastal Program Land Use Plan (the Land Use Plan was certified by the Coastal Commission on June 14, 2001) have been reviewed and considered. As discussed in Finding No. 2.b, the proposed development is consistent with the applicable policies of the certified Venice LUP.

d. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean; located within the Single Permit Jurisdiction of the Coastal Zone, where the local jurisdiction (City of Los Angeles) issues Coastal Development Permits. The Coastal Commission will render decisions on appeals of the City's Coastal Development Permits or Coastal Exemptions. The Coastal Commission took action on the following residential projects in the Venice Coastal Zone:

- In August 2025, the Commission, on consent, approved a Coastal Development Permit authorizing the after-the-fact demolition of a two-story, 6,952 square foot commercial building damaged by a fire in 2021 and the construction of a new three-story, 38 foot 4 inch high, 12,983 square foot mixed use building with 16 dwelling units, three of which will be set aside for Very Low Income Households; a 1,488 square foot roof deck with three roof access structures and 42 inch guardrails; a 1,363 square foot

ground floor retail/take-out restaurant space; nine parking spaces including two reserved for a residential car share program; 26 bicycle spaces including 18 reserved for residents and 8 reserved for commercial employees and patrons; and 21 cubic yards of cut with 16 cubic yards retained for fill, located at 723 Ocean Front Walk (5-24-0402).

- In December 2024, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the Venice Dell Community Project consisting of 1) the demolition of two existing, City-owned 196-space and seven-space public surface parking lots and an existing two-story, 1,970 square foot four-unit quadraplex; 2) the consolidation of 40 lots and subdivision into two ground lots and seven airspace lots; and 3) the construction of two new, three- and four-story, 35-ft. tall mixed-use structures totaling 103,957 square feet of habitable interior area and 137,805 square feet of interior garage area. The west structure includes a 67-ft. tall campanile, 63 affordable dwelling units, 3,065 square feet of commercial uses, 104 residential and commercial parking spaces, and one parking space reserved for public boat launch ramp access, as well as a subterranean level. The east structure includes 77 affordable dwelling units, a 2,875 square foot art studio, 250 public parking spaces, and three parking spaces reserved for public boat launch ramp access. An on-street loading/unloading space for vehicle access to the boat launch ramp would be provided on North Venice Boulevard. 9,100 cubic yards of cut and no fill is locally approved. At the de novo hearing, the Commission approved a modified project (5-22-0588).

- In February 2024, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of three residential structures, the merger of two lots into one 7,800 square foot lot, and the construction of a 15,016 square foot four-story, residential structure with eight condominium units (one unit Very Low Income and two Low Income) with 12 parking spaces and removal of five ornamental trees located at 2308 and 2310 Pisani Place (A-5-VEN-23-0044).

- In November 2021, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of three detached structures with nine dwelling units, consolidation of two lots, and construction of a new, three-story over basement, 13,412 square foot, mixed-use development including nine dwelling units, including one affordable dwelling unit, a 1,568 square foot restaurant, and 27 parking spaces on the two ocean-fronting lots at 815 Ocean Front Walk (A-5-VEN-21-0063).

- In December 2020, the Commission, on appeal, found No Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of a 2,056 square foot auto repair shop and addition to and conversion of a 2,482 square foot philanthropic use structure resulting in a four-story, 30,463 square foot mixed-use structure including 39 permanent supportive housing units and one manager unit, with 4,441 square feet of supportive services and 3,085 square feet of ground-floor commercial (office) space with a total of 6 on-site parking spaces, and 42 bicycle parking spaces located at 2467-2471 South Lincoln Boulevard (A-5-VEN-20-0060).

- In June 2019, the Commission, on appeal, found No Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of two institutional use structures and the construction of a 4-story, 35-unit affordable

supportive housing complex with approximately 1,875 square feet of administrative and program office space and 17 automobile and 48 bicycle parking spaces on two contiguous parcels located at 720 Rose Avenue (A-5-VEN-19-0020).

- On August 9, 2005, the Commission approved a Coastal Development Permit (de novo hearing) for the development of a three-story, 37-foot tall (up to 50 feet for one clock tower), mixed use project comprised of 70 residential condominium units of which seven are restricted for Very Low Income Households, five live/work units, and one groundfloor commercial use (bakery/restaurant), providing 247 parking spaces within a subterranean garage; the project is located on eight consolidated lots at 512 Rose Avenue, in the single permit jurisdiction (A-5-VEN-05-206).

In several decisions, the Coastal Commission approved increase density and Density Bonus incentives for increased height and reduced yards, determining that the resulting development would be consistent and visually compatible with existing development in the project vicinity. As such, this decision of the permit granting authority has been guided by applicable decisions of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

e. The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

Section 30210 of the Coastal Act states the following in regards to public access:

> *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, right of private property owners, and natural resources from overuse.*

Section 30211 of the Coastal Act states the following in regards to public recreation policies:

> *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

The subject property is located about one half mile away from the Pacific Ocean shoreline. The project could have an impact on public access to the coast if it resulted in a loss of on-street parking spaces or did not provide adequate parking for the dwelling. As described in the Parking Demand Management Assessment, the proposed project provides an array of alternative modes of travel including parking and bicycle parking to adequately serve the residents and patrons. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

f. An appropriate environmental clearance under the California Environmental Quality

Act has been granted.

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32). A full discussion is provided in Finding No. 6.

4. Project Permit Compliance Review Findings

a. The project substantially complies with the applicable regulations, findings, standards, and provisions of the Venice Coastal Zone Specific Plan.

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. As conditioned, the proposed project complies with the applicable General Land Use and Development Regulations set forth in Section 9, Land Use and Development regulations for the North Venice subarea set forth in Section 10.F, and the Parking provisions set forth in Section 13 of the Specific Plan as evidenced below:

A. Section 8.C. Findings

The project meets the required findings set forth in Section 8.C of the Venice Coastal Zone Specific Plan, as shown below:

1. The Venice Coastal Development Project is compatible in scale and character with the existing neighborhood, and that the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The subject site adjoins an unnamed alley at the rear. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. The proposed development is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault.

The subject property is located within the Venice Community Plan area with a Neighborhood Office Commercial Land Use Designation. The subject property is also

located within the area of the Venice Coastal Land Us Plan certified by the California Coastal Commission and adopted as a plan amendment to the Venice Community Plan. The subject property is also located within the North Venice Subarea of the Venice Coastal Zone Specific Plan, the Los Angeles Coastal Transportation Corridor Specific Plan, and within the Single Permit Jurisdiction area of the California Coastal Zone.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the west across Main Street is a three-story condominium constructed in 2008. The property to the east, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

2. The Venice Coastal Development Project is in Conformity with the Certified Venice Local Coastal Program.

A Local Coastal Program is comprised of a Land Use Plan and Implementation Plan, certified by the California Coastal Commission. The Venice Local Coastal Land Use Plan ("LUP") was certified by the Coastal Commission on June 14, 2001, however, the necessary Implementation Plan was not certified. The proposed project conforms to the applicable policies of the certified Venice LUP, as outlined in Finding No. 2.b.

3. ***The applicant has guaranteed to keep the rent levels of any Replacement Affordable Units at an affordable level for the life of the proposed project and to register the Replacement Affordable Unit with the Los Angeles Housing Department.***

   Per the Mello Act Determination letter, dated May 18, 2022, the Los Angeles Housing Department has determined that no affordable units exist at the subject site. The subject site consists of a vacant lot and two single-family dwellings. The owner filed an application with City Planning on March 21, 2021. LAHD collected monthly housing cost data for at least the previous three (3) years from March 2018 to March 2021. The Rent Stabilization Ordinance ("RSO") Unit confirmed that 1410 South Main Street has been a vacant lot since March 2018. 1414 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $ 3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018 - 2021 for a Moderate Level two (2) bedroom unit is $ 1,854, therefore the unit was rented at above affordable levels from March 201 8 - March 2021. 1418 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $ 3,551. The average Land Use Schedule 7 Maximum Allowable Rent for the years 201 8 -2021 for a Moderate Level two (2) bedroom unit is $ 1,854, therefore the unit was rented above affordable levels from March 201 8 - March 2021. The data collected from March 2018 - March 2021 shows that no affordable units exist at 1410 - 1418 South Main Street. Also see Finding No. 5.

4. ***The Venice Coastal Development Project is consistent with the special requirements for low- and moderate-income housing units in the Venice Coastal Zone as mandated by California Government Code Section 65590 (Mello Act).***

   Inclusionary Residential Units are required for this project. The project proposes the construction of 20 new Residential Units. Pursuant to Part 5 of the Interim Administrative Procedures, development which consists of 10 or greater Residential Units are New Housing Developments and are required to provide Inclusionary Residential Units. The proposed development of 20 new Residential Units provides four (4) affordable units, of which two (2) are Inclusionary Residential units. Therefore, the project provides the required affordable units under the Mello Act. See Finding No. 5.

In addition to the requisite findings set forth in Section 8.C of the Specific Plan, the project also complies with all applicable provisions of the Specific Plan, as set forth below:

B. Section 9. General Land Use and Development Regulations

1. *Lot Consolidation. Lot consolidation of more than two lots shall be permitted for mixed-use and multi-family residential Venice Coastal Development Projects, provided the project conforms to the existing scale and characteristic of the surrounding community, the required parking is onsite, and the project conforms to developments standards in Section 9.A.2 of the Specific Plan.*

   The proposed project consists of the consolidation of three (3) residential lots for the construction of a five-story, 26,889 square foot, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very

Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean garage. As discussed in Finding No. 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24-U.26. The project will utilize Land Use Policy I.B.7 where there are three lots with subterranean. Mixed use projects are permitted the consolidation of more than two lots if they conform to the existing scale and character of the surrounding community and provide adequate onsite parking. As discussed previously, the project is in line with midrise structures within a half mile of the project site that range in height from four to five stories. In addition, the project is eligible for AB 2097 and the City is not able to require additional parking for commercial and residential structures.

2. *Height. Height shall be measured from the centerline of the street or alley or walk adjacent to the front lot line measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building.*

   As shown in "Exhibit A", the height of the structure is measured from the centerline of Main Street and conforms to standard of measurement.

3. Roof Structures. Roof Access Structures shall not exceed the Flat Roof height limit by more than ten feet regardless of roof type. The project site proposes a 10-foot roof access structure with solar trellis, where building height is measured to the top of the solar trellis. As such, the project complies with Section 9.B. of the Specific Plan.

C. *Sections 10.F. Land Use and Development Regulations for North Venice Subarea*

1. *Density.* Projects in the North Venice Subarea on a commercially zoned lot shall exceed the density permitted in the R3 Zone.

   As discussed in Finding No. 2, the project qualifies for an On-Menu Incentive for height pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 (Density Bonus Affordable Housing Program). The project requests approval of a Density Bonus and the project propose 20 dwelling units, with four (4) affordable units, of which two (2) are considered Inclusionary Replacement Units. The project's proposed density is greater than 25 percent and as discussed in Finding No. 2, will not have any adverse effects on coastal resources.

2. *Height. Projects with a flat roof shall not exceed a maximum height of 30 feet. Projects with a varied roofline shall not exceed a maximum height of 35 feet.* The project proposes a Flat Roof with a maximum height of 52 feet 10 inches. As discussed in Finding No. 2, the project qualifies for a Waiver of Development Standards for height pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 (Density Bonus Affordable Housing Program).

Pursuant to the Venice Specific Plan North Venice Subarea, Venice Coastal Development Projects with flat roofs may be up to 30 feet in height. The project's proposed height is measured from the centerline of Main Street. With approval of the Density Bonus incentive, the project complies with the height provisions of the Specific Plan. The height increase is also consistent with the mass and scale of existing buildings within half a mile of the project site with residential and commercial structures ranging from four to five stories.

3. *Access.* Driveways and vehicular access to Venice Coastal Development Projects shall be provided from alleys, unless the Department of Transportation determines that it is not Feasible. As shown in "Exhibit A", the proposed project maintains vehicle access from the abutting rear alley.

D. *Section 11 – Commercial Design Standard*

1. *Ground Floor Commercial Development. Pursuant to the Venice Coastal Specific Plan, all commercial Venice Coastal Development Projects which fronts on Ocean Front Walk shall include a street wall which extends a minimum of 65 percent of the length of the Building Frontage, is set back zero feet from the building line, with a minimum height of 13 feet. In addition, a minimum of 50 percent of the area of the Ground Floor Street Wall of a commercial Venice Coastal Development Project shall be devoted to pedestrian entrances or windows; and there shall be at least one pedestrian entrance into each business or use for each Store Frontage.* As proposed, two restaurants and one take out restaurant will be located on the Ground Floor of the new mixed-use building observing no setback from the building line. The commercial portion of the Street Wall has a height of 13 feet as required. The Street Wall that the restaurant and take out restaurant spaces will occupy is approximately 91 percent of the ground floor. A pedestrian walkway and entrance are provided for the restaurant from the front of the structure along Main Street. Therefore, the project complies with the ground floor commercial development provisions of the Plan.

2. *Floor Area Ratio.* As discussed in Finding No. 2, the project qualifies for an off-menu incentive, pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program), for an FAR increase of 97.3 percent. The project proposes a FAR of 2.96:1 and a total lot area of 26,889 square feet.

3. *Access.* The project will provide access to the project site from the abutting alley. No new curb cuts are proposed along Main Street and all on-street parking opportunities will be maintained.

4. *Landscaping.* The project provides approximately 1,106 square feet of usable common open space on the roof deck of the structure. The project provides four new street trees.

5. *Light.* Any lighting is downward facing and is directed away from existing residential structures. The project is not located near Environmentally Sensitive Habitat Areas.

6. *Trash.* A residential and commercial trash enclosure/room is located at the ground level and includes regular trash and recycling chutes on all levels.

E. Section 13 – Parking

Pursuant to Section 13.D of the Specific Plan, restaurants shall provide one space per 50 square feet, window service restaurants shall provide one space per 50 square feet, office uses shall provide one space per 250 square feet, multi-family dwellings on a lot with a width of 40 feet or more shall provide two spaces for each dwelling unit, plus a minimum of one guest parking space for each four or fewer units, and Beach Impact Parking shall provide one space for each 640 square feet of floor area of the Ground Floor for commercial and industrial Venice Coastal Development Projects. As such, a total of 118 (73 Commercial and 45 Residential) parking spaces is required. However, the proposed project is located within a major transit stop (ZIMAS) and therefore, under Assembly Bill 2097 (AB 2097), the proposed project is not required to provide commercial or residential parking spaces, however, the proposed project will provide 28 vehicle parking spaces and 45 bicycle parking spaces to assist with mitigating any impacts around the project site.

b. The project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible.

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32). A full discussion is provided in Finding No. 5. The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit D.

Therefore, no mitigation measures or alternatives were identified in the environmental review.

Mello Act Compliance Review

5. Mello Act Compliance Review. Pursuant to the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act (IAP), all Conversions, Demolitions, and New Housing Developments must be identified in order to determine if any Affordable Residential Units are onsite and must be maintained, and if the project is subject to the Inclusionary Residential Units requirement. Accordingly, pursuant to the settlement agreement between the City of Los Angeles and the Venice Town Council, Inc., the Barton Hill Neighborhood Organization, and Carol Berman concerning implementation of the Mello Act in the Coastal Zone Portions of the City of Los Angeles, the findings are as follows:

a. Demolitions and Conversions (Part 4.0)

The project consists of the demolition of two Residential Units and the construction of 20 Residential Units in the Coastal Zone. The owner filed an application with the Department of City Planning on March 11,2021. Therefore, the Los Angeles Housing Department collected data from March 2018 to March 2021. Since March 2018, the property at 1410 South Main Street has been a vacant lot. 1414 South Main Street was rented during a look back period at an average amount of $3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018-2021 for a Moderate Level two (2) bedroom unit is $1,854, therefore the unit was rented at above affordable levels from March 2018 – March 2021. As such, the data collected from March 2018 – March 2021 shows that no affordable units exist on site. Therefore, no Affordable Replacement Units are required.

b. New Housing Developments (Part 5.0)

Part 5.0 of the IAP requires New Housing Developments of 10 or more Residential Units to provide Inclusionary Residential Units and provides two options:

- Option 1 requires 20 percent of all Residential Units, be reserved for occupancy by Very Low or Low Income Households.
- Option 2 requires 10 percent of all Residential units, be reserved for occupancy by Very Low Income Households.

The applicant proposes the construction of 20 Residential Units, of which four (4) units will be set aside for Very Low Income Households for a period of 55 years. The project satisfies Option 2 of Part 5.0 of the IAP and the requirements of LAMC Section 12.22 A.37. The four affordable units are required to satisfy the requirements of the requested Density Bonus Incentives and Waivers. Therefore, they are subject to the requirements of LAMC Section 16.60 (RPO).

CEQA Findings

6. Environmental Findings

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32).

The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit D.

The Class 1 Categorical Exemption allows for demolition and removal of individual small structures such as a duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling

units will be demolished. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The project proposed the demolition of two dwelling units and therefore qualifies for an exemption of this Class.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria: a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; c) The project site has no value as habitat for endangered, rare or threatened species; d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and e) The site can be adequately served by all required utilities and public services. The project qualifies for a Class 32 Categorical Exemption as an infill project, as evidenced below:

CEQA Determination – Class 32 Categorical Exemption Applies

a. **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.**

   The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations: The site is zoned C2-1-O and has a General Plan Land Use Designation of Neighborhood Office Commercial. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces and is in conformance with the General Plan and Zoning Designation.

b. **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

   The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The site is wholly within the City of Los Angeles, and is completely surrounded by urban uses. Surrounding properties include and multi-story residential uses.

c. **The project site has no value as a habitat for endangered, rare, or threatened species.**

The project site has no value as habitat for endangered, rare or threatened species. The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species: The area around the site is highly urbanized and surrounded by residential uses. NavigateLA shows that the subject site is not located in a Significant Ecological Area. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952 and has no value as a habitat for endangered, rare or threatened species.

d. **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance for pollutant discharge, dewatering, and stormwater mitigations; and Best Management Practices for stormwater runoff. More specifically, RCMs include but are not limited to:

- **Regulatory Compliance Measure RC-AQ-1 (Demolition, Grading and Construction Activities): Compliance with provisions of the Southern California Air Quality Management District (SCAQMD) District Rule 403.** The project shall comply with all applicable standards of the SCAQMD, including the following provisions of District Rule 403:

    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

    - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), to prevent excessive amounts of dust.

    - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

    - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

    - General contractors shall maintain and operate construction equipment to minimize exhaust emissions.

    - Trucks having no current hauling activity shall not idle but be turned off.

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

These RCMs will reduce any potential impacts on noise and water quality. Furthermore, the project does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) for preparing a traffic study. The project will not conflict with any adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities. Therefore, the project will not have any significant impacts to traffic. Likewise, air quality will not worsen as a result of the proposed project. Interim thresholds were developed by DCP staff based on CalEEMod model runs relying on reasonable assumptions, consulting with SCAQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. **The site can be adequately served by all required utilities and public services.**

The project site will be adequately served by all public utilities and services given that the property was previously developed with commercial uses surrounded by urban uses, served by existing infrastructure, and is consistent with the General Plan.

The project is a transit-oriented, infill development on a site within an urbanized area and meets the criteria outlined above. Therefore, the project qualifies for a Class 32 Categorical Exemption.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

The City has considered whether the proposed Project is subject to any of the six (6) exceptions that would prohibit the use of a categorical exemption as set forth in State CEQA Guidelines Section 15300.2. The six (6) exceptions to this Exemption are: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

a. **Cumulative Impacts.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The project is consistent with the type of development permitted for the area zoned C2-1-O and designated Neighborhood Office Commercial. The proposed project has submitted a Parking Demand Study and Noise Report to indicate no significant impacts will be made as a result of this project. As such, the proposed project will not exceed thresholds identified for impacts to the area (i.e., traffic, noise, etc.) and will not result in significant cumulative impacts.

b. **Significant Effect Due to Unusual Circumstances.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The surrounding area is developed with similar residential and commercial uses. There are 9 existing midrise buildings within 0.5 miles of the project site that range between four to five stories. The proposed height and massing are not unusual for the project vicinity or the nearby Windward Circle. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

c. **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. State Route 27 is located more than 7 miles northwest of the project site. Therefore, the project will not impact a designated state scenic highway.

d. **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
The project site is not identified as a hazardous waste site or is on any list compiled pursuant to Section 65962.5 of the Government Code.

e. **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

ADDITIONAL MANDATORY FINDING

8. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone AE, areas of One Hundred-Year Flood where the Base Flood elevations and Flood Hazard factors have been determined.

DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: March 12, 2026
Time: After 8:30 A.M.*
Place: Los Angeles City Hall
Council Chambers, 3rd Floor
200 North Spring Street, Room 340
Los Angeles, CA 90012

This meeting may be available virtually, in a hybrid format. The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at https://planning.lacity.org/about/commissionsboards-hearings and/or by contacting cpc@lacity.org

Public Hearing: Required
Appeal Status: Off-Menu Density Bonus Incentives and Waivers are not appealable per LAMC; All other entitlements are appealable to the City Council.
Expiration Date: March 12, 2026
Multiple Approval: Yes

Case No.: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA
CEQA No.: ENV-2021-2021-CE
Council No.: 11 – Park
Plan Area: Venice
Specific Plan: Venice Coastal Zone Specific Plan - North Venice Subarea
Certified NC: Venice
GPLU: Neighborhood Office Commercial
Zone: C2-1-O

Applicant: Brittany Teague
Three On The Tree, LLC
Representative: Tony Russo, Crest Real Estate

PROJECT LOCATION: 1410 – 1422 South Main Street

PROPOSED PROJECT: The demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one-level subterranean garage; and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

REQUESTED ACTION:

1. Pursuant to California Environmental Quality Act (CEQA) Guidelines, an Exemption from CEQA pursuant to CEQA Guidelines, Article 19, Sections 15301 (Class 1) and 15332 (Class 32), and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. Pursuant to LAMC Section 12.22 A.37[1], a Density Bonus/Affordable Housing Incentive Compliance Review for a Housing Development Project comprised of 20 dwelling units, of which four (4) dwelling units will be set aside for Very Low-Income Household Occupancy, with the following requested Incentives and Waivers of Development Standards:

[1] The Applicant filed a Density Bonus Application on June 16, 2025. An Affordable Housing Referral Form was issued on August 12, 2025 pursuant to LAMC Section 12.22 A.37 and the State Density Bonus Program adopted as part of the Citywide Housing Incentive Program (CHIP). The hearing notice provides a reference to the old Density Bonus Ordinance LAMC 12.22 A.25.

a. An Off-Menu Incentive to allow a Floor Area Ratio (FAR) increase of 97.3 percent resulting in a FAR of 2.96, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3;

b. An Off-Menu Incentive to allow a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;

c. An Off-Menu Incentive to allow a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;

d. An Off-Menu Incentive to allow a zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a);

e. A Waiver of Development Standards to allow a maximum building height of 52 feet, 10 inches, in lieu of 30 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3;

f. A Waiver of Development Standards to remove the step back provisions, in lieu of the 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3(a);

g. A Waiver of Development Standards to allow a Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C;

3. Pursuant to Los Angeles Municipal Code Chapter 1A Section 13B.9.1, a Coastal Development Permit for the proposed project located within the Single Permit Jurisdiction of the Coastal Zone;

4. Pursuant to Los Angeles Municipal Chapter 1A Section 13B.4.2, a Project Compliance for the proposed project on a lot located within the North Venice Specific Plan; and

5. 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 the demolition of two (2) Residential Units and the construction of 20 Residential Units in the Coastal Zone.

RECOMMENDED ACTIONS:

1. **Determine** based on the whole of the administrative record that the project is exempt from CEQA pursuant to CEQA Guidelines, Sections 15301 and 15332 and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

2. **Approve** a Density Bonus Affordable Housing Incentive Program Review pursuant to LAMC Section 12.22 A.37, a Density Bonus/ Affordable Housing Incentive Compliance Review for a Housing Development Project comprised of 20 dwelling units, of which four (4) dwelling units will be set aside for Very Low Income households, with the following requested Incentives and Waivers of Development Standards:

    a. An Off-Menu Incentive to allow a Floor Area Ratio (FAR) increase of 97.3 percent resulting in a FAR of 2.96, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3

b. An Off-Menu Incentive to allow a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;

c. An Off-Menu Incentive to allow a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2;

d. An Off-Menu Incentive to allow a zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a);

e. A Waiver of Development Standards to allow a maximum building height of 52 feet, 10 inches, in lieu of 30 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3;

f. A Waiver of Development Standards to remove the step back provisions, in lieu of the 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3(a);

g. A Waiver of Development Standards to allow a Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

3. **Approve** a Coastal Development Permit pursuant to Los Angeles Municipal Code (LAMC) Chapter 1A Section 13B.9.1, for the proposed project on a lot located within the Single Permit Jurisdiction of the Coastal Zone.

4. **Approve** a Project Compliance pursuant to Los Angeles Municipal Code (LAMC) Chapter 1A Section 13B.4.2, for a Project within the Venice Coastal Zone Specific Plan.

5. **Approve** a Mello Act Compliance Review pursuant to Sections 65590 and 65590.1 of the California Government Code and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, for the demolition of two (2) Residential Units and the construction of 20 Residential Units in the Coastal Zone.

6. **Adopt** the attached Conditions of Approval.

7. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning

Theodore L. Irving

Theodore L. Irving, AICP, Principal Planner

Juliet Oh

Juliet Oh, Senior City Planner

Ira Brown

Ira Brown, City Planner

Sienna Kuo

Sienna Kuo, Planning Assistant
sienna.kuo@lacity.org
(213) 978-1376

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the Commission Secretariat, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300) or emailed to cpc@lacity.org. While all written communications are given to the Commission for consideration, the initial packets are sent to the Commission's Office a week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to the agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Project Analysis **A-1**

Project Summary
Background
Requested Entitlements
Environmental Review
Issues
Professional Volunteer Program
Public Hearing and Communications
Conclusion

Conditions of Approval **C-1**

Findings **F-1**

Entitlement Findings
CEQA Findings

Public Hearing and Communications **P-1**

Exhibits:

A – Maps

A1 – Vicinity Map
A2 – Radius Map
A3 – Zoning Map
A4 – Land Use Designation Map

B – Plans

Project Plans
Landscape Plans

C – Community Character Analysis

D – Parking Demand Management Assessment

E – Historical Resource Assessment

F – Environmental Clearance: ENV-2021-2021-CE

G – LAHD Mello Act and Replacement Unit Determinations

H – Public Correspondence

PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one-level subterranean garage; and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The project will provide 24 vehicle parking spaces and 40 long-term bicycle parking spaces in the subterranean parking garage. Four commercial vehicle parking spaces are provided at ground level and five short-term bicycle parking spaces are provided in the public right-of-way. Vehicular access will be provided by a two-way driveway from the abutting alley.

The roof deck provides 2,883 square feet of Common Open Space of which 1,106 square feet is landscaped. The roof deck also includes a solar trellis. The area under the solar trellis is considered Floor Area and is considered the fifth floor. This area will be used as amenity space for residents.

The project provides five studio units, five one-bedroom residential units, and 10 two-bedroom residential units. The five studio units and five one-bedroom residentials units are located on second level and each of the two-bedroom residential units are levels within internal stairs occupying the third and fourth level. The average floor area of the studio units is 476 square feet. The average floor area of the one-bedroom residential units is 561 square feet. The average floor area of the two-bedroom residential units is 1,075 square feet.

The project site will maintain one existing street tree to the north of the project site and provide four new 24-inch box street trees. The project does not include the removal of any on-site trees; the existing street tree will be retained and protected in place. In addition, the project includes 9,850 cubic yards of cut.



Figure 1: Project rendering from Main Street

BACKGROUND

Project Site

The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The subject site adjoins an unnamed alley at the rear. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. According to SurveyLA, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared, dated June 2021, and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

The subject site is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault.



Figure 2: Aerial Image of subject site and vicinity

General Plan Land Use Designation, Zoning, and Specific Plan

The subject property is located within the Venice Community Plan with a Neighborhood Office Commercial Land Use designation and zoned C2-1-O. The property is also located within the Los Angeles Coastal Transportation Corridor Specific Plan, Venice Coastal Zone Specific Plan (North Venice Subarea), and the Single Permit Jurisdiction of the Coastal Zone. In addition, the property is subject to the Venice Local Coastal Land Use Plan (LUP) certified by the California Coastal Commission and adopted as an amendment to the Venice Community Plan.

Surrounding Properties

The neighborhood and surrounding properties are developed single and multi-story commercial structures and single and multi-story residential structures within zoning classifications of C2-1-O, RD1-1-O, and C4-1.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The property is developed with a three-story apartment and a two story fourplex, constructed in 1911 & 1912. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.



Figure 3: Zoning classification of subject site

Streets and Circulation

Main Street, is an Avenue II (Secondary Highway), designated to a right of way width of 86 feet and a roadway width of 70 feet. The actual right-of-way width is approximately 100 feet and a roadway width of 75 feet. Main Street is improved with a curb, gutter, and sidewalks. The roadway is currently a two-lane street with a center median running north and south, terminating at the intersection of Main Street and Venice Way to the south, approximately 680 feet from the project site.

Unnamed Alley, is an asphalt paved alleyway designated to a right-of-way width of 20 feet. The actual right-of-way width is approximately 16 feet and is improved with an asphalt roadway.

Public Transit:

The subject site is located within 300 feet of a Major Transit Stop at Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any

residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street and within 300 feet from the Windward Circle, a Major Transit stop within Venice. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The surrounding area is served by Big Blue Bus Route 1 located at the intersection of Main Street and Market Street, Culver City Bus Route No. 1 located at the intersection of Windward Avenue and Main Street, Los Angeles County Metropolitan Transit Authority (Metro) bus line 33 at the intersection of Main Street and Grand Boulevard.

Relevant Cases

On-site:

CPC-2013-2377-DB-CDP-SPP-MEL – On August 18, 2015, the applicant withdrew their density bonus application for a four-story, 91,968 square foot, mixed use development.

Surrounding Properties (500 Foot Radius):

DIR-2020-6059-CDP-MEL – On June 28, 2021, the Director of Planning approved a Coastal Development Permit and Mello Act Compliance Review for the conversion of a storage room within an existing duplex into a 479 square-foot Accessory Dwelling Unit (ADU). A total of five (5) parking spaces are provided: two spaces for each existing dwelling unit and one new space for the ADU, located in the Single Permit Jurisdiction area of the Coastal Zone, located at 247 & 249 East Market Street.

DIR-2020-6219-CDP-MEL – On May 18, 2021, the Director of Planning approved a Coastal Development Permit and Mello Act Compliance Review for the conversion of an existing storage room in a duplex into a 479 square-foot Accessory Dwelling Unit (ADU). The project will maintain four (4) parking spaces for the duplex and provide one (1) additional space for the new ADU; located in the Single Permit Jurisdiction area of the Coastal Zone, located at 245 1-3 East Market Street.

DIR-2018-4410-CDP-SPP – On April 3, 2020, the Director of Planning approved a Coastal Development Permit and Project Permit Compliance Review authorizing the change of use of 2,179 square feet of medical office to restaurant and office use, in conjunction with a 1,531 square-foot second-story addition. The 2,632 square-foot restaurant is limited to 1,585 square feet of Service Floor area with 73 seats and a full line of alcoholic beverages for onsite consumption, with hours of operation from 8:00 a.m. to 1:00 a.m. daily. A total of 22 vehicle parking spaces is required; the project is located within the Single Permit Jurisdiction of the California Coastal Zone, located at 78 East Market Street.

ZA-2018-3595-CU-CUB-ZV – On April 3, 2020, the Zoning Administrator approved a Zone Variance and Conditional Use granting 11 off-site parking spaces by lease in lieu of a recorded agreement (covenant), allow the sale of alcohol (full line) for onsite consumption for a 2,632 square foot restaurant with 73 seats (52 interior, 21 exterior/patio) with operation hours from 8:00 am to 1:00 am daily, and tandem parking, and relief from a 5 foot landscape buffer for a Commercial Corner Development/ Mini-Shopping Center, located at 78 East Market Street.

DIR-2016-2172-CDP-MEL – On December 18, 2017, the Director of Planning approved a Coastal Development Permit and Mello Act Compliance Review for the demolition of an existing one-story duplex with an attached one-car garage and the construction of a new three-story single-family dwelling with an attached two-car garage and roof deck on a property located in a Single Permit Jurisdiction area of the California Coastal Zone, located at 210 East San Juan Avenue. & 213 East Horizon Avenue.

DIR-2016-2550-CDP-MEL – On August 14, 2017, the Director of Planning approved a Coastal Development Permit and Mello Act Compliance Review for the demolition of an existing one-story single-family dwelling and construction of a new three-story single-family dwelling with an attached two-car garage and roof deck in the Single Permit Jurisdiction area of the California Coastal Zone, located at 230 East Horizon Avenue.

ZA-2005-4475-CDP-MEL – On January 19, 2006, the Zoning Administrator approved a Coastal Development Permit authorizing the demolition of an existing office building and new construction of a new single-family dwelling located within the Single Permit Jurisdiction of the California Coastal Zone, located at 1401 South Main Street.

ZA-2014-4913-CDP-SPP – On January 27, 2016, the Zoning Administrator approved a Coastal Development Permit and Project Permit Compliance Review for the remodel and change of use of a 2,310 square-foot medical office to 1,823 square-foot retail use (floor area) and a 1,531 square-foot, second-story addition consisting of 1,092 square feet (floor area) of retail use and 329 square feet (floor area) of office use in the CM-1 zone within the Single Permit Jurisdiction of the California Coastal Zone, located at 78 East Market Street.

ZA-2014-4913-CDP-SPP – On January 27, 2016, the Zoning Administrator approved a Coastal Development Permit and Project Permit Compliance Review for the remodel and change of use of a 2,310 square-foot medical office to 1,823 square feet of retail use (floor area) and a 1,531 square-foot, second-story addition consisting of 1,092 square feet (floor area) of retail use and 329 square feet (floor area) of office use in the CM-1 zone within the single-permit jurisdiction of the California Coastal Zone, located at 78 East Market Street.

ZA-2005-3231-CDP-SPP-MEL – On November 21, 2005, the Zoning Administrator approved a Coastal Development Permit, Project Permit Compliance Review, and Mello Act Compliance Review for the construction, use, and maintenance of six residential condominium units, in conjunction with Tentative Tract 63052, in the Single-Permit Jurisdiction area of the California Coastal Zone, located at 1415 South Main Street, 1410 & 1414 South Innes Place and 1411, 1415, & 1419, South Main Street.

HOUSING REPLACEMENT

The Housing Crisis Act of 2019 (HCA) originally introduced replacement requirements and occupant protections through Senate Bill (SB) 330 and has since been updated by SB 8 (2021), Assembly Bill (AB) 1218 (2023), and AB 130 (2025). In February 2025, the Los Angeles City Council adopted the Resident Protections Ordinance (RPO), which codified and expanded upon replacement requirements and occupant protections of the HCA, and enhanced requirements for Restricted Affordable Units. Pursuant to LAMC Ch. 1 Section 16.60, housing development projects and non-housing development projects that result in the demolition of protected units that are occupied, or are located on a site where protected units have been vacated and demolished within the past five years, shall be subject to replacement requirements. Existing occupants of

demolished protected units are also entitled to occupant protections. Housing development projects that require the demolition of residential dwelling units must construct at least as many residential dwelling units as will be demolished.

The RPO Replacement Unit Determination dated October 29, 2025, states one unit is subject to the Rent Stabilization Ordinance (RSO) and one is subject to replacement at market rate. The LAHD housing replacements are satisfied by the four (4) Very Low-Income Units provided through this Density Bonus Affordable Incentive Program. The project will comply with all applicable requirements to the satisfaction of LAHD, including any updates to the October 9, 2025 determination that is needed to comply with SB8. This is reflected in the conditions of approval.

Pursuant to the Mello Act Determination made by Los Angeles Housing Department (LAHD), dated May 18, 2022, no affordable units existed at 1410-1418 Main Street.

REQUESTED ENTITLEMENTS

State Density Bonus Program

Pursuant to LAMC Section 12.22 A.37 State Density Bonus Program, the City must grant up to three (3) incentives for a project that includes 15 percent of the total units (base density) for Very Low Income Households. State Density Bonus Law further stipulates that in no case may a city apply any development standard that will have the effect of physically precluding the construction of a development meeting the criteria of Government Code 65915 (b) at the densities or with the concessions or incentives permitted by State Density Bonus Law, and allows applicants to submit to a city a proposal for the waiver or reduction of development standards that will have the effect of physically precluding the construction of such a development. The City implements the State Density Bonus Law through LAMC Section 12.22 A.37 State Density Bonus Program.

The applicant proposes to utilize LAMC Section 12.22 A.37 State Density Bonus Program to construct a total of 20 dwelling units, of which four (4) dwelling units will be set aside for Very Low Income Household Occupancy. Density Bonus projects are eligible for four (4) incentives if they reserve 16 percent or more of base dwelling units for Very Low Income Households or at least 30 percent of base dwelling units for Low Income Households. The project provides four (4) units reserved for Very Low Income, which would be approximately 16 percent of 25 base dwelling units, the project is eligible for four (4) Density Bonus Incentives. The applicant is requesting four (4) Density Bonus Incentives as follows:

a. An Off-Menu Incentive to allow a Floor Area Ratio (FAR) increase of 97.3 percent resulting in a FAR of 2.96, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3.

b. An Off-Menu Incentive to allow a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.

c. An Off-Menu Incentive to allow a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.

d. An Off-Menu Incentive to allow a zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a).

Per California Government Code Section 65915(e)(1) and LAMC Ch. 1 Section 12.22 A.37(d)(3)(i), a Housing Development Project may also request other "waiver(s) or reduction(s) of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria…at the densities or with the concessions or incentives permitted under [State Density Bonus Law]". In addition to the Density Bonus Incentives, the applicant is requesting three (3) Waivers of Development Standards, as follows:

a. A Waiver of Development Standards to allow a maximum building height of 52 feet, 10 inches, in lieu of 30 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.

b. A Waiver of Development Standards to remove the step back provisions, in lieu of the 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3(a).

c. A Waiver of Development Standards to allow a Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

Density Bonus Projects in the Coastal Zone

Density Bonus Projects located within the Coastal Zone are required to comply with the provisions of both Density Bonus State Law and the Coastal Act. Government Code section 65915(m) states that the density bonus and incentives *provisions do not supersede or in any way alter or lessen the effect or application of the California Coastal Act of 1976 (Division 20 (commencing with Section 30000) of the Public Resources Code). Any density bonus, concessions, incentives, waivers or reductions of development standards, and parking ratios to which the applicant is entitled under this section shall be permitted in a manner that is consistent with this section and Division 20 (commencing with Section 30000) of the Public Resources Code.* In that regard, the Legislature's intent is that the two statutes be harmonized so as to achieve the goal of increasing the supply of affordable housing in the coastal zone while also protecting coastal resources, coastal access, and compliance with all other applicable policies of the Coastal Act.

Coastal Development Permit

Pursuant to Los Angeles Municipal Code (LAMC) Chapter 1A Section 13B.9.1, the applicant is requesting a Coastal Development Permit for Development proposed in the Single Permit Jurisdiction of the California Coastal Zone.

> *"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of the use of land, including, but not limited to, subdivisions pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including parcel maps and private street divisions, except where any land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant*

to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511 of the California Public Resources Code). As used in this definition, "structure" includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line.

Project Permit Compliance Review

Pursuant to Los Angeles Municipal Code (LAMC) Chapter 1A Section 13B.4.2, the applicant requests a Project Permit Compliance Review for a project within the North Venice Subarea of the Venice Coastal Zone Specific Plan.

Mello Act Compliance Review

Pursuant to Sections 65590 and 65590.1 of the California Government Code and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures (IAP), the applicant requests a Mello Act Compliance Review for the demolition of two (2) Residential Units and the construction of 20 Residential Units in the Coastal Zone. The project proposes the demolition of existing dwelling units and the construction of new 20 dwelling units, therefore, the project is required to provide Inclusionary Residential Units Pursuant to Part 5.0.

- *Demolitions and Conversions (Part 4.0).* The owner filed an application with the Department of City Planning on March 11, 2021. Therefore, the Los Angeles Housing Department collected data from March 2018 – March 2021. The Los Angeles Housing Department (LAHD) issued a Mello Act Determination Letter dated May 18, 2022, stating that no affordable units exist at the subject site. Therefore, no Affordable Replacement Units are required.

- *New Housing Developments (Part 5.0). New Housing Developments of 10 or more Residential Units are required to provide Inclusionary Residential Units and provides two options:*

    - *Option 1 requires 20 percent of all Residential Units, be reserved for occupancy by Very Low or Low Income Households.*

    - *Option 2 requires 10 percent of all Residential units, be reserved for occupancy by Very Low Income Households.*

The applicant proposes the construction of 20 Residential Units, of which four (4) units will be set aside for Very Low Income Households for a period of 55 years. The project satisfies Option 2 of Part 5.0 of the IAP's Inclusionary Residential Unit requirement.

ENVIRONMENTAL REVIEW

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one-level subterranean garage; and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class 1 – Existing Facilities) and 15332 (Class 32 – Infill Development) (see Exhibit D: Environmental Clearance).

ISSUES

The following includes a discussion of issues and considerations related to the project. These discussion points were either identified during the design review process with the Urban Design Studio's Professional Volunteer Program (PVP) or in discussion with the applicant.

Professional Volunteer Program

The proposed project was reviewed by the Department of City Planning, Urban Design Studio's Professional Volunteer Program (PVP) on July 8, 2025. The PVP panel provided the following comments regarding overall project design. The applicant considered the comments from the Urban Design Studio and PVP, and where appropriate, modified the project plans and provided the following written response.

Pedestrian First

- Ground floor is underarticulated. Ensure that the lobby is highly visible, adding windows or glass doors to enhance transparency. Ultimately, the design should create a prominent restaurant frontage along Main Street.

  Applicant response: Please see updated plans, elevations and renders, restaurant frontage has more fenestration and glass sliding doors to enhance transparency and activate the street frontage

- Provide additional information on the amenities being offered in the various proposed courtyards and the Rooftop. Clearly indicate path of travel to the open space area, amenities, and landscaping.

  Applicant response: The courtyard on Level 3 will be a landscaped area, visible to the private bedrooms overlooking the space. Access to this space from Level 4 will be only for the purposes of landscape maintenance. Part of the roof deck area will be landscaped (please refer to attached Landscape Plan) and the area under the solar trellis will be used as a common seating area for residents. The roof deck area will be accessed through the roof access staircase and elevator.

- Relocate bike parking to the ground floor to enhance accessibility.

  Applicant response: Short-term bike parking stalls are provided on the sidewalk- please refer to Site Plan on Sheet A100. For long-term bike parking, the bike parking room is currently located at the basement level owing to limited ground floor space, given that there are many functional spaces including commercial and back-of-house facilities, necessary to be accommodated on the ground floor. As a result, the owner has decided to sacrifice accessibility to the bike parking room in order to get a larger and more comfortable bike parking room on the basement level.

- Indicate pedestrian circulation and mark where the restaurant + take-out restaurant doors.

  Applicant response: Please see updated plan on Sheet A101 for locations of doors for the restaurants and the take-out restaurant. Please see pedestrian circulation diagram on Sheet T102:3

- Provide Open Space Diagram and calculations Seating area under solar trellis counts as FAR, not towards open space.

  Applicant response: Please see Open Space Diagram/ calculations on Sheet T102 and FAR calculations on Sheet T101. Seating area under solar trellis is not included in the open space diagram and is counted towards FAR.

- Improve main entrance legibility by considering an overhang, signage, special lighting and/or recess. The current design lacks clear delineation between residential and commercial entries..

  Applicant response: Please see attached renders highlighting restaurant frontage and signage as distinct from the entry for residents

- Frontages facing public streets or pedestrian paths should be more engaging; the current perforated metal screens may not provide sufficient transparency or activity.

  Applicant response: Please see updated plans, elevations and renders- restaurant frontage has more fenestration/ glass sliding doors to enhance transparency. The perforated metal screens cover very less fenestration on the ground level, activating street frontage, and provide varying degrees of transparency throughout the facade of the building.

- Avoid conflicts at access points for delivery, trash, and bike movement.

  Applicant response: Please see access to the bike locker room from elevator shaft on Sheet A106, showing a clear path to the exit that does not cross vehicle paths. Access to the Bike room is through the residential lobby in the front whereas access to the trash and recycling areas are through the alley in the back, so as to not intermix their circulation paths.

- Clarify trash circulation and service access: lack of direct service corridors from kitchens to trash areas raises functional concerns; currently, trash removal appears to require moving through lobbies or long internal paths.

  Applicant response: Please see circulation diagram on Sheet T102:3 for service route/ trash removal route. In order to keep the restaurants and kitchens located towards the front of the site to activate the street frontage, the trash rooms and back-of-house facilities are located towards the back of the site with direct access to the alley. A service corridor connects the restaurant kitchens to the trash room without interfering with residential or commercial circulation, thereby keeping the trash removal circulation separate. needs (e.g. stretcher size, delivery access), raising issues about operations, maintenance, and emergency access.

- PVP participants raised concerns about elevators meeting commercial service needs (e.g. stretcher size, delivery access).

  Applicant response: The elevator size meets ADA requirements and the submitted drawings with the given elevator shaft dimensions have already received Preliminary Zoning Approval (PZA) from LADBS.

<u>360° Design</u>

- Screen the mechanical equipment area or provide a wall as separation for safety issues. Consult LADBS regarding screening.

  Applicant response: A screen for the mechanical equipment area will be provided at the roof deck.

- Balance scale and rooftop visibility: Design rooftop elements to reduce visual impact from surrounding buildings and public viewpoints.

  Applicant response: The 15' tall solar trellis is designed in accordance with the Los Angeles Zoning code Table 12.21.1.B 3. (c) and will provide a shaded rooftop area for resident amenities. The restaurant bar area on Level 4 is located at that level to leverage ocean views towards the West. Please see attached renders- the solar trellis is integrated into the massing of the building, thereby reducing the visual impact as a distinct structure, from the surrounding buildings and public viewpoints.

- Bathroom placements for units on Fourth Floor are facing a deck and located far from plumbing stacks. Redesign unit layout for logical and efficient planning.

  Applicant response: Please see updated Level 3 floor plan on Sheet A103- no bathrooms face the front decks. On Level 4, powder bathrooms are located next to residential unit entrances so as to maximize ocean views for the living/ dining spaces in the units.

- Please provide updated renderings to better convey how the massing and design relate to the surrounding Venice streetscape and architecture.

  Applicant response: Please see attached renderings.

Climate Adapted

- Provide a Landscape Plan to constitute a complete submittal and indicate number of proposed and remaining trees.

  Applicant response: Provided on Sheet L100

- Provide street trees along Main Street frontage public right of way.

  Applicant response: See Sheet L200

- Consider landscaped front setbacks to soften the public edge and permeable paving for walkways and driveways.

  Applicant response: Addressed on Sheet L200

- Consider ways to scale the trellis down or integrate it more seamlessly into the overall design.

  Applicant response: The 15' tall solar trellis is designed in accordance with the Los Angeles Zoning code Table 12.21.1.B 3. (c) and will provide a shaded rooftop area for resident amenities. Please see attached renders- the solar trellis is integrated into the massing of the building, thereby reducing its visual impact as a distinct structure.

- Rooftop and small side-yard spaces are cited as open space, but some may not qualify due to dimensions (e.g., less than 15 feet wide).

  Applicant response: Please see Open Space Diagram/ calculations on Sheet T102 that specify the areas that are counted towards the Open Space Calculation after considering the minimum dimension requirement for qualification of a space towards the required Open Space.

- No clear detailing of operable walls or folding/sliding systems to allow for passive cooling or seamless indoor-outdoor flow, especially for restaurant spaces.

  Applicant response: Please see updated Level 1 Floor plan on Sheet A101

showing the locations of operable doors and windows for all spaces including restaurant spaces.

- Tree wells are too small and may not support tree survival.

  *Applicant response: Adjusted on Sheet L200*Please consult Urban Forestry and look into integrating more climate-adapted plantings and infrastructure such as structural soil or Silva Cells.

Applicant response: See Sheets L200 and L201

PUBLIC HEARING AND COMMUNICATIONS

A public hearing was held virtually via Zoom by a hearing officer (Sienna Kuo) on December 10, 2025 at 1:00 pm. Comments from the public hearing are documented in Public Hearing and Communications, Page P-1. However, due to a change in the proposed project, a new public hearing is required and will be held by the City Planning Commission.

CONCLUSION

Based on evaluation of the project and information submitted, input from the public, and the proposed project's compliance with applicable regulations, Los Angeles City Planning recommends the City Planning Commission approve the requested actions and adopt the attached Conditions of Approval and Findings.

Approval of the requests herein will enable the creation of 20 new residential units, including four (4) deed restricted affordable units. The proposed project will provide greater housing density and affordable units along a major corridor within the Venice Coastal Zone. The project will provide more affordable housing than required and reduces the number of vehicles within the area by providing parking, access to a Major Transit Stop, and including additional bicycle parking. The proposed 20-unit mixed-use project will also provide recreational and amenity areas for the residential units and incorporates ground level commercial uses to activate the corridor. The project will enhance the physical appearance of the property and surrounding area through its thoughtful and interesting design features, including a well-articulated façade and roofline design.

CONDITIONS OF APPROVAL

Density Bonus Conditions

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped Exhibit "A" attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.

2. **Residential Density.** The project shall be limited to a maximum density of 20 dwelling units, including On-Site Restricted Affordable Units.

3. **On-site Restricted Affordable Units.** Four (4) units shall be reserved for Very Low Income Household Occupancy as defined by the State Density Bonus Law per Government Code Section 65915 and by the Los Angeles Housing Department (LAHD). In the event the RPO Replacement Unit condition requires additional affordable units or more restrictive affordability levels; the most restrictive requirements shall prevail.

4. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Sections 12.22 A.25 and State Density Bonus Law (Government Code Section 65915).

5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to make four (4) units available to Very Low-Income Households or equal to 16 percent of the project's total base residential density allowed, for sale or rental, as determined to be affordable to such households by LAHD for a period of 99 years. In the event the applicant reduces the proposed density of the project, the number of required reserved on-site Restricted Units may be adjusted, consistent with LAMC Section 12.22 A.37, to the satisfaction of LAHD, and in consideration of the project's Replacement Unit Determination. Enforcement of the terms of said covenant shall be the responsibility of LAHD. The applicant shall present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the LAHD.

   Unless otherwise required by state or federal law, the project shall provide an onsite building manager's unit, which the owner shall designate in the covenant. The Owner may not use an affordable restricted unit for the manager's unit.

6. **Rent Stabilization Ordinance (RSO).** Prior to the issuance of a Certificate of Occupancy, the owner shall obtain approval from LAHD regarding replacement of affordable units, provision of RSO Units, and qualification for the Exemption from the Rent Stabilization Ordinance with Replacement Affordable Units in compliance with Ordinance No. 184,873. In order for all the new units to be exempt from the Rent Stabilization Ordinance, the applicant will need to either replace all withdrawn RSO units with affordable units on a one-for-one basis or provide at least 20 percent of the total number of newly constructed rental units as affordable, whichever results in the greater number. The executed and recorded covenant and agreement submitted and approved by LAHD shall be provided.

7. **Floor Area Ratio (Off-Menu Incentive).** The project is allowed a maximum FAR of 2.96.

8. **Side Yard Setback – Northwesterly (Off-Menu Incentive).** The project is allowed a minimum northwesterly side yard setback of 5 feet.

9. **Side Yard Setback – Southeasterly (Off-Menu Incentive).** The project is allowed a minimum southeasterly side yard setback of 5 feet.

10. **Front Yard Setback – Residential (Off-Menu Incentive**). The project is allowed a zero-foot front yard setback for residential floor area.

11. **Height (Waiver)** – The building shall not exceed a maximum Flat Roof height of 52 feet,10 inches as measured from the midpoint of the centerline of Main Street to the highest point of the roof.

12. **Step-Back (Waiver) –** The front 45-degree step back plane is removed.

13. **Roof Access Structure (Waiver)** – The building is allowed a Roof Access Structure with a maximum exterior dimension of 176 square feet.

14. **Parking and Access**. As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide 28 parking spaces onsite; all vehicle access shall be provided from the rear alley.

    a. Residential Parking – 24 parking spaces shall be provided for the residential units.

    b. Commercial Parking - 4 parking spaces shall be provided for the commercial uses.

15. **Parking Per AB 2097.** The project shall be permitted to provide a minimum of zero automobile parking spaces pursuant to AB 2097. Twenty-eight automobile parking spaces are provided.

16. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC Section 12.21 A.16. As shown in "Exhibit A" and as approved by the Department of Building and Safety, the subject project shall provide 45 bicycle spaces onsite.

17. **Adjustment of Parking**. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including the Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.

18. **Electric Vehicle Parking**. All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC. Any parking spaces provided above LAMC requirements shall be provided with EV chargers to immediately accommodate electric vehicles within the parking areas.

Coastal Development Permit Conditions

19. **Single Permit Jurisdiction Area.** The project is located within the Single Permit Jurisdiction area of the California Coastal Zone. Pursuant to LAMC Section 13B.9.1.D.4, the decision of the permit granting authority, or any appeal body to approve issuance of a permit shall not be deemed to be final and no Coastal Development Permit may be issued until 20 working days have expired from the date said notice of permit issuance is deemed received by said Executive Director and without an appeal having been taken to the Coastal Commission. Prior to the issuance of any permits, the applicant shall provide a copy of the Coastal Commission's Notification that the City's coastal development permit is effective.

20. **Front Façade (Articulation).** The front façade of the structure shall be articulated as shown in "Exhibit A."

21. **Commercial Floor Area.** The project shall be limited to 656 square feet of office use and 3,676 square feet of restaurant uses providing 2,098 square feet of Service Floor area and 467 square feet of outdoor Service Floor area.

22. **Street Wall.** The project shall provide the required Street Wall for the portions of the structure fronting Main Street. The Street wall shall extend for at least 65 percent of the length of the Building Frontage, be set back zero feet from the building line, and maintain a minimum height of 13 feet, as shown on Exhibit A.

23. **Ground Floor.** At least 50 percent of the area of the Ground Floor Street Wall of the Project shall be devoted to pedestrian entrances, display windows or windows offering views into restaurant or lobby space, as shown on Exhibit A.

24. **Roof Structures.** Chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the height limit by a maximum of five feet.

Additional Entitlement Conditions.

25. **Street Trees.** Street trees shall be provided to the satisfaction of the Urban Forestry Division. Street trees may be used to satisfy on-site tree requirements pursuant to LAMC Article Section 12.21.G.3 (Chapter 1, Open Space Requirement for Six or More Residential Units).

    Required Trees per 12.21 G.2. As conditioned herein, a final submitted landscape plan shall be reviewed to be in substantial conformance with Exhibit "A." There shall be a minimum of four (4) 24-inch box, or larger, trees on site pursuant to LAMC Section 12.21 G.2. Any required trees pursuant to LAMC Section 12.21 G.2 shown in the public right-of-way in Exhibit "A" shall be preliminarily reviewed and approved by the Urban Forestry Division prior to building permit issuance. In-lieu fees pursuant to LAMC Section 62.177 shall be paid if placement of required trees in the public right-of-way is proven to be infeasible due to City determined physical constraints.

26. **Landscape Plan.** Revised landscape plans shall be submitted to show the size and location of all plants. The landscape plan shall indicate landscape points for the Project as required by Los Angeles Municipal Code (LAMC) 12.40 and Landscape Ordinance Guidelines "O". All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be landscaped, including an automatic irrigation system, and maintained in accordance with a final landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning. The final landscape plan shall

be in substantial conformance with the submitted Landscape Plan, Exhibit "A," and shall incorporate any modifications required as a result of this grant.

27. **Stormwater/irrigation** – The project shall implement on-site stormwater infiltration as feasible based on the site soils conditions, the geotechnical recommendations, and the City of Los Angeles Department of Building and Safety Guidelines for Storm Water Infiltration. If on-site infiltration is deemed infeasible, the project shall analyze the potential for stormwater capture and reuse for irrigation purposes based on the City Low Impact Development (LID) guidelines.

28. **Solar.** The Project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

29. **Solar and Electric Generator.** Generators used during the construction process shall be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.

30. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, Environmental Sensitive Areas, the public right-of-way, nor from the above.

31. **Trash.** Separate trash collection areas for residential and commercial trash collection shall be maintained and shall also accommodate the separate collection of recyclable trash. The separate trash collection areas shall be clearly identified on final plans submitted for review and sign-off.

32. **Graffiti**. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

Administrative Conditions

33. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building & Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building & Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building & Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

34. **Notations on Plans.** Plans submitted to the Department of Building & Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

35. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

36. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

37. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building

plans submitted to the Department of City Planning and the Department of Building and Safety for purposes of having a building permit issued at any time during the term of this grant.

38. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

39. **Department of Building & Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building & Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building & Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

40. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

41. **Expiration**. In the event that this grant is not utilized within three years of its effective date (the day following the last day that an appeal may be filed), the grant shall be considered null and void. Issuance of a building permit, and the initiation of, and diligent continuation of, construction activity shall constitute utilization for the purposes of this grant.

42. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

Entitlement Findings

Density Bonus/Affordable Housing Incentives Compliance Findings

1. Pursuant to Government Code Section 65915 and LAMC Section 12.22 A.37, the Commission shall approve a density bonus and requested incentive(s)/waiver(s) unless the Commission finds that:

a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c).

The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested incentives do not result in identifiable and actual cost reduction to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low-, low-, and moderate-income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

Based on the set-aside of 16 percent of 20 base units for Very Low Income and Low Income Households, the applicant is entitled to four (4) Incentives under both Government Code Section 65915 and the Los Angeles Municipal Code (LAMC). The request for an increase in Floor Area Ratio (FAR), decrease in northwesterly and southeasterly side yard setbacks, and decrease in residential front yard setback qualify as requested incentives. The remaining requests allow an increase in the allowable height, removal of front façade step back provisions, and the increase in allowable square footage of the Roof Access Structure are Waivers of Development Standards.

Floor Area Ratio (Off-Menu Incentive) – An Off- Menu Incentive to allow a FAR of 2.96:1 in lieu of a FAR of 1.5:1, as otherwise required by the Venice Coastal Zone Specific Plan 11.B.3. Commercially zoned lots within the Venice Coastal Zone Specific Plan are allowed a FAR equal to 1.5 square feet of building floor area to each (1) square foot of buildable lot area for mixed use buildings.

Should the project adhere to the allowable FAR in the C2-1 zone, its total square footage would be limited to 13,635 square feet. The Off-Menu Incentive to increase the FAR by 97.3 percent would allow an increase of 13,254 square feet for a total of 26,889 square feet, which would accommodate a larger construction envelope to provide additional affordable units and additional market rate units. The ability to develop larger building or more units will increase the revenues from the market-rate floor area, which will lower the marginal cost of developing and operating the affordable units. The requested incentive allows the developer to expand the building envelope so that additional units can be constructed, and the overall space dedicated to residential uses is increased. These Incentives support the Applicant's decision to provide four (4) affordable units for Very Low-Income Households.

Side Yard Setback – Northwesterly (Off-Menu Incentive). An Off-Menu Incentive to allow a reduced northwesterly side yard setback of 5 feet in lieu of the required 8-foot side yard setback, as otherwise required in the C2 Zone pursuant to LAMC Section 12.11.C.2. Off-Menu incentives are permitted a 37.5 percent reduction in the north-westerly side yard setback.

The applicant requests a reduction of three feet in northwesterly side yard to allow for efficient floor plates that maintain adequate light, air, and privacy through upper-level plane breaks and façade articulation, while avoiding structural inefficiencies that would increase cost and reduce the number of feasible residential units, including a potential impact to the very low-income units.

Side Yard Setback – Southeasterly (Off-Menu Incentive). An Off-Menu Incentive to allow a reduced southeasterly side yard setback of 5 feet in lieu of the required 8-foot side yard setback, as otherwise required in the C2 Zone pursuant to LAMC Section 12.11.C.2. Off-Menu incentives are permitted a 37.5 percent reduction in the north-westerly side yard setback.

The applicant requests a reduction of three feet in northwesterly side yard to allow for efficient floor plates that maintain adequate light, air, and privacy through upper-level plane breaks and façade articulation, while avoiding structural inefficiencies that would increase cost and reduce the number of feasible residential units, including a potential impact to the very low-income units.

Front Yard Setback (Off-Menu Incentive). An Off-Menu Incentives to allow a 100% decrease in front yard setback for residential floor area to allow 0 foot, 0 inch, in lieu of the required 5 feet as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.4.

Residential portions of a mixed-use structure are required to adhere to LAMC requirements, however, no less than 5 feet according to the Venice Coastal Zone-Specific Plan. Removal of the front yard setback will allow for the structure to align with the established street wall and reinforce pedestrian orientation and façade articulation along Main Street without compromising the size of residential units. The project proposes providing 20 residential units, including four (4) Very Low Income affordable units. The additional square footage permitted by the reduction of the front yard setback decreases the marginal costs of providing the units reserved for Very Low Income households. If the building were to adhere strictly to the 5-foot front yard setback requirement in the C2-1-O Zone, the project would be limited in the size and/or number of units the project could provide, undermining the project's financial feasibility by increasing the marginal costs of providing the units reserved for Very Low Income households. The requested incentive will allow the developer to expand the building envelope so the additional units can be constructed and the overall space dedicated for residential uses increased.

b. The Incentive will have a Specific Adverse Impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec.

65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

As such, the project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed incentive(s) will have a specific adverse impact on public health and safety.

c. The incentives are contrary to state or federal law.

There is no substantial evidence in the record that the requested incentives are contrary to state or federal law.

2. Pursuant to Government Code Section 65915 and LAMC Section 12.22 A.37, the Commission shall approve a density bonus and requested waiver(s) unless the Commission finds that:

a. The Development Standard associated with a request for a Waiver will not have the effect of physically precluding the construction of a development meeting the eligibility criteria described in Paragraph (c) at the densities or with the Base Incentives and Additional Incentives permitted under this subdivision.

A project that meets the requirements of Government Code 65915 may request other "waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]" (Government Code Section 65915(e)(1)).

Therefore, the request for the following is recommended as Waivers of Development Standards. Without the below Waivers, the existing development standards would physically preclude development of the base units, build out of the incentives, and project amenities:

Height (Waiver) – A waiver to allow a 76.1 percent increase in total building height from the permitted 30 feet to 52 feet, 10 inches as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.a.

The project site is zoned C2-1-O with a Height District of 1, which provides for unlimited building height. However, the Venice Coastal Zone Specific Plan for the North Venice Subarea further limits building height to 30 feet for flat rooflines and 35 feet for varied rooflines. The proposed structure is functionally a four-story mixed-use structure, however due to the nature of the proposed solar trellis, the solar trellis functions as an additional floor. Compliance with the height limitations of the Specific Plan would reduce the solar trellis height and rooftop amenity dedicated to residential use. As such, the Off-Menu

Incentive for increased height is necessary to accommodate a larger construction envelope to provide for the affordable units and market rate units. As with FAR, the ability to develop a larger building with more units will increase revenues from the market-rate units, which will lower marginal cost of developing and operating the affordable units, thereby making the project financially feasible. The requested incentive allows the developer to expand the building envelope so that the additional units can be constructed, solar trellis to abide by the Green Code, and increase the overall space dedicated to residential use.

Step Back Provisions (Waiver) – A Waiver to allow the removal of the step-back-provisions, in lieu of the 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

The required step back provisions would reduce the square footage and private open space provided for each unit. Compliance with the step-back requirement would substantially reduce the floor area and livable space for the residential portion of the mixed use structure, as proposed. Without the waiver, the applicant would be physically precluded from constructing some portion of the residential units. The requested waiver will allow the developer to expand the building envelope so the units can be constructed, and the overall space dedicated to residential use is increased.

Roof Access Structure (Waiver) – A Waiver to increase the maximum exterior dimension to 176 square feet in lieu of 100 square feet as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

The maximum permitted RAS of 100 square feet as measured from the exterior walls is typically permissible for a standalone residential structure, however, mixed use or multi-family structures require additional space for stair and elevator access. The Los Angeles Fire Department egress requirements and ADA accessibility to the rooftop amenities for all residents, including those with disabilities requires additional mechanical equipment and therefore, a larger roof access structure to accommodate.

b. The Waiver would have a Specific Adverse Impact as defined in California Government Code Section 65589.5(d)(2), upon public health and safety and for which there is no feasible method to satisfactorily mitigate or avoid the Specific, Adverse Impact. Inconsistency with the zoning ordinance or General Plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentive(s) or waiver(s) will have a specific adverse impact. Pursuant to California Government Code Sec. 65589.5(d)(2), specific adverse impact is defined as a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. As required by Section 12.22 A.37(c), the project meets the eligibility criterion that is required for the provisions of the State Density Bonus Program.

The project is not located on a substandard street in a Hillside area and is not located in a Flood Zone, Very High Fire Hazard Severity Zone, or any other special hazard area. Therefore, there is no substantial evidence that the proposed project and requested waivers would have a specific adverse impact on public health and safety.

c. The Waiver would have an adverse impact on any real property that is listed in the California Register of Historical Resources.

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

As such, the project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed waivers will have an adverse impact on public health and safety.

d. The Waiver would be contrary to state or federal law.

There is no substantial evidence in the record indicating that the requested waivers are contrary to any state or federal law.

3. Coastal Development Permit Findings

a. The development is in conformity with Chapter 3 of the California Coastal Act of 1976.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Venice Specific Plan, as follows:

- The increase allowable FAR to 2.96:1 in lieu of 1.5:1,
- The removal of the 5-foot residential front yard setback in lieu of 5 feet,
- The increase building height to 52 feet, 10 inches in lieu of 30 feet,
- The remove the step back provisions in lieu of a 45 degree step back plane break, and
- The increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet.

In addition, the proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the LAMC, as follows:

- Reduce the northwesterly side yard to allow 5 feet in lieu of 8 feet,
- Reduce the southeasterly side yard to allow 5 feet in lieu of 8 feet.

As discussed in Finding No. 1, the proposed Density Bonus project meets the requirements of Density Bonus State Law to be eligible for the density bonus, incentives, and waivers of development standards. In addition, the proposed development must also comply with the requirements of the Coastal Act. As provided in the findings below, the proposed development complies with the applicable policies of the Coastal Act and the Venice LUP.

Chapter 3 of the Coastal Act includes provisions that address the impact of development on public services, infrastructure, traffic, the environment and significant resources, and coastal access. Applicable provision are as follows:

Article 2 Public Access

Section 30211 Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) It is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) Adequate access exists nearby, or, (3) Agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The project site is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone. Therefore, the proposed project will not interfere with or obstruct the public's right to access to coastal resources.

As such, the project conforms to the applicable Public Access policies of Chapter 3.

Article 5 Land Resources

Section 30240 requires the protection of environmentally sensitive habitat areas and to prevent significant impacts on such areas.

Section 30244 Archaeological and Paleontological Resources.
Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The proposed project consists of the demolition of two single-family dwellings, and the

construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project will be built atop existing grade resulting in minimal disturbance to the existing geology and soils of the project site.

Further, the project site is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of various types of land uses and the area is not located in an area identified to contain paleontological or archaeological resources. Any archaeological resources that may have existed near the project site surface are likely to have been disturbed or previously removed. However, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during project grading activities. If previously unknown archaeological resources are found during excavation and grading, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. If archaeological or paleontological resources are discovered during grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

Further, the project site is not identified in the Venice Land Use Plan as a site located within or adjacent to an Environmentally Sensitive Habitat Area (ESHA). The proposed development would be fully developed within the boundaries of the private lots and would not impact sensitive habitat areas. As such, the project conforms to the applicable Land Resources policies of Chapter 3.

Article 6 Development

Section 30250 Location; existing developed area.
(a) 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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

The project is located in an existing developed area surrounded by similar residential and commercial uses and will not have a significant adverse impact on coastal resources. Existing infrastructure servicing the existing residences will be used by the proposed development. Utility lines and water pipes will be connected to the proposed development. In addition, the project area is within the service area of the Los Angeles Fire Department Station 63 and the Pacific Division of the Los Angeles Police Department. Primary regional access is provided by the Marina Freeway, Venice Boulevard, and Lincoln Boulevard, which are all accessible within 1.5 miles of the Project Site.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a

two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the project will be located in an existing developed area contiguous with similar residential uses and will not have a significant adverse impact on coastal resources.

Section 30251 Scenic and Visual Qualities.
The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The architectural character of nearby development includes an eclectic mix of architectural styles including modern and contemporary style buildings. The project's proposed contemporary design fits into the architectural diversity of the neighborhood. The project height, massing and scale of the project is consistent with existing buildings along Main

Street. As discussed above, the project would increase the maximum density for the subject site from six dwelling units to 20 dwelling units. The project would increase the maximum building envelope with a height increase of 22 feet and 10 inches, reduction in the residential front yard setback from 5 feet to 0 feet, reduction in the side yards from 8 feet to 5 feet, and increasing the FAR from 1.5:1 to 2.96:1. The proposed development will not adversely impact the scale or character of the street as it is situated on a busy corridor developed with multi-family residential and commercial structures that are comparable in height and massing.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

As such, the proposed project is compatible in scale and character with the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood. Furthermore, the proposed increase in density is consistent with higher density permitted in the underlying adjacent multi-family residential zone and fits within a building envelope that is compatible with the surrounding area. The increase in density and provision of affordable housing in the Coastal Zone is consistent with the California Coastal Commission's policies for increasing housing and affordable housing in the Coastal Zone.

The project's consistency with development standards in the certified Venice LUP is important in assessing the project's compatibility with the character of the surrounding area. The certified Venice LUP states that the development standards also define for each land use designation a density of housing units and lot coverage to maintain the scale and character of existing residential neighborhoods and minimize the impacts of building bulk and mass." (LUP, p.II-2.)

The proposed development complies with Policy I.A.13 (Density Bonus Application) which allows for reduced restrictions for density, height and setback standards as outlined in Policies I.A.1, I.A.8, I.E.1, I.E.2, I.E.3 and II.A.3 of the Venice Land Use Plan (LUP), further discussed in Finding No. 3.b. As such, the proposed development is visually compatible with the character of the surrounding area and will further enhance the visual quality of the area.

Section 30252 Maintenance and Enhancement of Public Access.
The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces.

The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which added Government Code Section (§) 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions.

The property is located within 250 feet from a Major Transit Stop at Main Street and Market Street and within 300 feet from the Windward Circle, a Major Transit stop within Venice. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants. The surrounding area is served by Big Blue Bus Route 1 located at the intersection of Main Street and Market Street, Culver City Bus Route No. 1 located at the intersection of Windward Avenue and Main Street, Los Angeles County Metropolitan Transit Authority (Metro) bus line 33 at the intersection of Main Street and Grand Boulevard.

Although the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation

within a High Quality Transit Area. As demonstrated in the Parking Demand Management Assessment provided, empirical surveys demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

The proposed project is not located between the first public road and the sea and is located more than a half of a mile from the beach. The proposed project will not interfere with or obstruct the public's right to access to coastal resources. The proposed development will not have any adverse impacts on public access to the coast. No permanent structures will be placed within the public right-of-way and public access to the coast will not be obstructed. The proposed project will neither interfere nor reduce access to the shoreline as the site does not have direct access to any water or beach. As demonstrated in the Parking Demand Management Assessment, the project will not have a significant adverse impact on coastal resources.

Section 30253 Minimization of Adverse Impacts.
New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The subject site is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, within 5 kilometers of the Santa Monica Fault, and within the Single Permit Jurisdiction of the Coastal Zone.

The project site is also located within an area that may be affected by Sea Level Rise. On August 12, 2015, the Coastal Commission adopted a Sea Level Rise Policy Guidance document, updated and adopted On November 14, 2024. This policy document provides a framework and directions for local jurisdictions to address sea level rise (SLR) in Local Coastal Programs (LCPs) and Coastal Development Permits (CDPs). In May 2018, the City completed an initial sea level rise vulnerability assessment for the Venice Coastal Zone. The report provides that: Existing wide beaches generally protect Venice from coastal hazards. Coastal assets along or near the beachfront are potentially vulnerable during a large storm event in combination with SLR greater than 3.3 feet. After 4.9 feet SLR, beachfront assets are more vulnerable to damage from flooding or potential erosion of the beach. A SLR of 6.6 feet is a tipping point for Venice's exposure to extreme coastal wave events. Beachfront and coastal assets could flood annually, beaches could be greatly reduced in width, and high water levels could greatly increase potential for flooding of inland low-lying areas. As discussed in the analysis, there is considerable uncertainty around the timing of SLR, how coastal processes may be affected, and what adaptation

approaches will be applied in the future (VSLRVA, pg. 45). Policies and development standards to address the potential impacts of SLR would be addressed in the City's LCP for the Venice Coastal Zone.

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed use would have no adverse impacts on public access, recreation, public views or the marine environment, as the property is located within a developed residential area and located a half mile from Venice Beach. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filling, or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed dwelling will not block any designated public access views. As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

b. The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.

Coastal Act Section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act. The Venice Local Coastal Land Use Plan ("LUP") was certified by the California Coastal Commission on June 14, 2001; however, the necessary implementation ordinances were not adopted. The City is in the initial stages of preparing the LCP; prior to its adoption the guidelines contained in the certified LUP are advisory. The subject site is located within the North Venice Subarea with a land use designation of Neighborhood Office Commercial and zoned C2-1-O.

The following are applicable policies from the certified Venice Land Use Plan:

Policy I. A. 9. *Replacement of Affordable Housing. Per the provisions of Section 65590 of the State Government Code, referred to as the "Mello Act", the conversion or demolition of existing residential units occupied by persons and families of low or moderate income shall not be permitted unless provisions have been made for replacement of those dwelling units which result in no net loss of affordable housing in the Venice Community in accordance with Section 65590 of the State Government Code (Mello Act).*

Policy I.A.10. *Location of Replacement Housing. The replacement units shall be located in one or more of the following areas, listed in order of priority: 1) on the site of the converted or demolished structure; 2) within the site's Venice coastal subarea; 3) within the Venice Coastal Zone; 4) within the Venice Community Plan area east of Lincoln Boulevard; and, 5) within a three mile radius of the affected site.*

Policy I.A.11. *Replacement Ratios for Replacement Units. Replacement ratios shall be at a minimum of 1:1 (one unit replaced for each unit removed). Replacement ratios shall increase according to how far from the affected site replacement units are located as defined in the Mello Act.*

Policy I.A.13. *Density Bonus Applications. Required replacement dwelling units shall be counted as reserved units in any related State mandated density bonus application for the same project.*

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses, a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The proposed project is subject to the requirement under the Housing Crisis Act (SB 330/SB8) and the City's Interim Administrative Procedures for Complying with the Mello Act (IAP). The Los Angeles Housing Department (LAHD) issued an SB330/SB8 Replacement Unit Determination (RUD) dated October 29, 2025 requiring the replacement of one (1) affordable replacement unit and one (1) market rate unit. As such, the four (4) residential units will be set aside for Very Low Income Households satisfies this requirement. Finding No. 5 provides a full discussion of the requirements under the IAP.

Policy I.A.14. Parking Requirements for Affordable Housing. Reduced parking is permitted for low income units only if: a) the project is consistent with LUP policy I.A.13; and b) it is demonstrated that the prospective occupants of the project will have a reduced demand for parking. However, if a unit changes its status from low or low-moderate income to market rate unit, parking should be provided for market rate units according to the parking standards listed in LUP Policies II.A.3 and II.A.4.

On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. The subject site is located within a half mile of a Major Transit Stop at the Windward Circle. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

Further, the Venice Coastal Zone Specific Plan would otherwise require 118 spaces, the project site qualifies under AB 2097 due to its proximity to major transit and its designation within a High Quality Transit Area. Empirical surveys, provided the Parking Demand Management Assessment, demonstrate substantial available capacity in nearby public and private parking facilities, with average utilization rates of approximately 62 percent on weekend evenings and 80 percent on weekend afternoons, leaving hundreds of available spaces during peak periods. A field survey of comparable Main Street restaurants confirms that existing establishments do not provide dedicated off-street customer parking, reflecting the area's shared-parking and multimodal access pattern. The project exceeds required bicycle parking, provides secure long- and short-term bicycle facilities, and is located within walking distance of bus routes, Metro Bike Share, and protected bike lanes. Given the demonstrated off-site capacity and the site's strong multimodal infrastructure, the proposed parking reduction will not create adverse coastal access or neighborhood parking impacts.

Policy I.B.2. Mixed-Use Development. Mixed-use residential commercial development shall be encouraged in all areas designated on the Land Use Policy Map for commercial use. Residential density in commercial land use designations shall not exceed one unit per 800-1200 square feet of lot area and shall comply with the Floor Area Ratio (FAR)

limits set forth in Policy I.B.7. The design of mixed-use development is intended to help mitigate the impact of the traffic generated by the development on coastal access roads and reduce parking demand by reducing the need for automobile use by residents and encouraging pedestrian activity. Such development shall comply with the density and development standards set forth in this LUP.

As discussed in Finding No 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24 U.26. The proposed development utilizes the provisions of Density Bonus State Law to deviate from the requirements of the Venice LUP and Specific Plan, as follows: Increase allowable FAR to 2.96:1 in lieu of 1.5:1, decrease the front yard setback for residential floor area to allow 0 feet, 0 inches in lieu of 5 feet, increase the overall height for a total building height of 52 feet, 10 inches in lieu of 30 feet maximum, remove the step back provisions in lieu of a 45 degree step back plane, and Increase allowable exterior dimension of Roof Access Structure to 176 square feet in lieu of 100 square feet. As discussed in Finding No. 1, the project qualifies for the requested incentive and waiver. As such, the proposed development is visually compatible with the character of the surrounding area, proposed density bonus, incentives, and waivers are consistent with the applicable policies of the Coastal Act and Venice LUP

Preservation of Venice as a Special Coastal Community

Policy I.E.1. General. Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.

Policy I.E.2. Scale. *New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer, and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.*

Policy I.E.3. Architecture. *Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.*

The proposed project is visually compatible with the character of surrounding areas and sited and designed to protect coastal visual resources. The neighborhood and surrounding properties are developed with multi-family dwellings and commercial structure with zoning classifications of C2-1-O, RD1.-1-O, and C4-1. Surrounding properties include single and multi-story commercial structures and single and multi-story residential structures.

The adjoining property to the north has a similar land use designation of Neighborhood Office Commercial and is zoned C2-1-O. The property is developed with a three-story apartment and a two story fourplex, constructed in 1911 & 1912. To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the requested 22 feet, 10 inches above the permitted flat roof height will be materially detrimental to the adjoining lots or the immediate neighborhood.

Further, the proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates

articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

Policy II.C.1. General Non-Vehicular Coastal Access Policy. Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.

The proposed project will provide 28 vehicular parking spaces and 45 bicycle parking spaces. The subject site is located within a half mile of a Major Transit Stop, Windward

Circle. On September 22, 2022, the Governor signed Assembly Bill (AB) 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop, with minor exceptions. In addition to its close proximity to public transit, the applicant will still provide 28 subterranean vehicular parking spaces and 45 bicycle parking spaces for the commercial and residential tenants.

The proposed five story, mixed use structure is consistent with the policies of the Certified Venice Land Use Plan and the standards of the Venice Coastal Zone Specific Plan. The project will not prejudice the ability of the City to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act.

c. The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination.

The Los Angeles County Interpretive Guidelines were adopted by the California Coastal Commission (October 14, 1980) to supplement the Statewide Guidelines. Both regional and statewide guidelines, pursuant to Section 30620 (b) of the Coastal Act, are designed to assist local governments, the regional commissions, the commission, and persons subject to the provisions of this chapter in determining how the policies of this division shall be applied to the coastal zone prior to the certification of a local coastal program.

As stated in the Regional Interpretive Guidelines, the guidelines are intended to be used "in a flexible manner with consideration for local and regional conditions, individual project parameters and constraints, and individual and cumulative impacts on coastal resources". In addition to the Regional Interpretive Guidelines, the policies of the Venice Local Coastal Program Land Use Plan (the Land Use Plan was certified by the Coastal Commission on June 14, 2001) have been reviewed and considered. As discussed in Finding No. 2.b, the proposed development is consistent with the applicable policies of the certified Venice LUP.

d. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean; located within the Single Permit Jurisdiction of the Coastal Zone, where the local jurisdiction (City of Los Angeles) issues Coastal Development Permits. The Coastal Commission will render decisions on appeals of the City's Coastal Development Permits or Coastal Exemptions. The Coastal Commission took action on the following residential projects in the Venice Coastal Zone:

- In August 2025, the Commission, on consent, approved a Coastal Development Permit authorizing the after-the-fact demolition of a two-story, 6,952 square foot commercial building damaged by a fire in 2021 and the construction of a new three-

story, 38 foot 4 inch high, 12,983 square foot mixed use building with 16 dwelling units, three of which will be set aside for Very Low Income Households; a 1,488 square foot roof deck with three roof access structures and 42 inch guardrails; a 1,363 square foot ground floor retail/take-out restaurant space; nine parking spaces including two reserved for a residential car share program; 26 bicycle spaces including 18 reserved for residents and 8 reserved for commercial employees and patrons; and 21 cubic yards of cut with 16 cubic yards retained for fill, located at 723 Ocean Front Walk (5-24-0402).

- In December 2024, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the Venice Dell Community Project consisting of 1) the demolition of two existing, City-owned 196-space and seven-space public surface parking lots and an existing two-story, 1,970 square foot four-unit quadraplex; 2) the consolidation of 40 lots and subdivision into two ground lots and seven airspace lots; and 3) the construction of two new, three- and four-story, 35-ft. tall mixed-use structures totaling 103,957 square feet of habitable interior area and 137,805 square feet of interior garage area. The west structure includes a 67-ft. tall campanile, 63 affordable dwelling units, 3,065 square feet of commercial uses, 104 residential and commercial parking spaces, and one parking space reserved for public boat launch ramp access, as well as a subterranean level. The east structure includes 77 affordable dwelling units, a 2,875 square foot art studio, 250 public parking spaces, and three parking spaces reserved for public boat launch ramp access. An on-street loading/unloading space for vehicle access to the boat launch ramp would be provided on North Venice Boulevard. 9,100 cubic yards of cut and no fill is locally approved. At the de novo hearing, the Commission approved a modified project (5-22-0588).

- In February 2024, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of three residential structures, the merger of two lots into one 7,800 square foot lot, and the construction of a 15,016 square foot four-story, residential structure with eight condominium units (one unit Very Low Income and two Low Income) with 12 parking spaces and removal of five ornamental trees located at 2308 and 2310 Pisani Place (A-5-VEN-23-0044).

- In November 2021, the Commission, on appeal, found Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of three detached structures with nine dwelling units, consolidation of two lots, and construction of a new, three-story over basement, 13,412 square foot, mixed-use development including nine dwelling units, including one affordable dwelling unit, a 1,568 square foot restaurant, and 27 parking spaces on the two ocean-fronting lots at 815 Ocean Front Walk (A-5-VEN-21-0063).

- In December 2020, the Commission, on appeal, found No Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of a 2,056 square foot auto repair shop and addition to and conversion of a 2,482 square foot philanthropic use structure resulting in a four-story, 30,463 square foot mixed-use structure including 39 permanent supportive housing units and one manager unit, with 4,441 square feet of supportive services and 3,085 square feet of ground-floor commercial (office) space with a total of 6 on-site parking spaces, and 42 bicycle parking spaces located at 2467-2471 South Lincoln Boulevard (A-5-VEN-20-0060).

- In June 2019, the Commission, on appeal, found No Substantial Issue with the City approval of a Coastal Development Permit authorizing the demolition of two institutional use structures and the construction of a 4-story, 35-unit affordable

supportive housing complex with approximately 1,875 square feet of administrative and program office space and 17 automobile and 48 bicycle parking spaces on two contiguous parcels located at 720 Rose Avenue (A-5-VEN-19-0020).

- On August 9, 2005, the Commission approved a Coastal Development Permit (de novo hearing) for the development of a three-story, 37-foot tall (up to 50 feet for one clock tower), mixed use project comprised of 70 residential condominium units of which seven are restricted for Very Low Income Households, five live/work units, and one groundfloor commercial use (bakery/restaurant), providing 247 parking spaces within a subterranean garage; the project is located on eight consolidated lots at 512 Rose Avenue, in the single permit jurisdiction (A-5-VEN-05-206).

In several decisions, the Coastal Commission approved increase density and Density Bonus incentives for increased height and reduced yards, determining that the resulting development would be consistent and visually compatible with existing development in the project vicinity. As such, this decision of the permit granting authority has been guided by applicable decisions of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

e. The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

Section 30210 of the Coastal Act states the following in regards to public access:

> *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, right of private property owners, and natural resources from overuse.*

Section 30211 of the Coastal Act states the following in regards to public recreation policies:

> *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

The subject property is located about one half mile away from the Pacific Ocean shoreline. The project could have an impact on public access to the coast if it resulted in a loss of on-street parking spaces or did not provide adequate parking for the dwelling. As described in the Parking Demand Management Assessment, the proposed project provides an array of alternative modes of travel including parking and bicycle parking to adequately serve the residents and patrons. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

f. An appropriate environmental clearance under the California Environmental Quality Act has been granted.

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32). A full discussion is provided in Finding No. 6.

4. Project Permit Compliance Review Findings

a. The project substantially complies with the applicable regulations, findings, standards, and provisions of the Venice Coastal Zone Specific Plan.

The project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. As conditioned, the proposed project complies with the applicable General Land Use and Development Regulations set forth in Section 9, Land Use and Development regulations for the North Venice subarea set forth in Section 10.F, and the Parking provisions set forth in Section 13 of the Specific Plan as evidenced below:

A. Section 8.C. Findings

The project meets the required findings set forth in Section 8.C of the Venice Coastal Zone Specific Plan, as shown below:

1. The Venice Coastal Development Project is compatible in scale and character with the existing neighborhood, and that the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The subject site adjoins an unnamed alley at the rear. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952. The proposed development is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault.

The subject property is located within the Venice Community Plan area with a Neighborhood Office Commercial Land Use Designation. The subject property is also located within the area of the Venice Coastal Land Us Plan certified by the California Coastal Commission and adopted as a plan amendment to the Venice Community Plan. The subject property is also located within the North Venice Subarea of the Venice Coastal Zone Specific Plan, the Los Angeles Coastal Transportation Corridor

Specific Plan, and within the Single Permit Jurisdiction area of the California Coastal Zone.

To the south of the project site is a two-story commercial structure also zoned C2-1-O constructed in 1962. The property to the east across Main Street is a three-story condominium constructed in 2008. The property to the west, across the abutting alley, is zoned RD1.5-1-O with a land use designation of Low Medium II Residential and developed with a two-story, fourplex, constructed in 1922.

The neighborhood and surrounding properties are developed with single and multi-family dwellings. Within a half mile radius of the subject site, there are five (5) C2-1-O zoned lots and ten (10) C4-1 zoned lots. The lots zoned C2-1-O are developed with one – two story structures. The C4-1 zoned lots are developed with one to three story structures. Based on the survey provided by the applicant team, the average height of the immediate area is approximately 21.9 feet and the average building height if 1.8 stories. While the proposed project will exceed these averages with a 5-story structure, approximately 52 feet, 10 inches, the average does not reflect the full range of existing structures. Structures nearby such as 1310-1320 Innes Place and 1501 Main Street are three stories with an approximate height of 30 feet. Without the proposed solar trellis, the structure would be considered 46 feet, 4 inches tall. As such, the proposed project is within the scale and character of the existing neighborhood, and the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood.

The proposed building is functionally a four-story mixed-use structure; the rooftop solar trellis results in a technical fifth-level measurement, but it is an open, lightweight shade element rather than an occupiable floor and materially reduces energy demand while enabling additional deed-restricted affordable housing. Within the broader Venice neighborhood, numerous four- and five-story buildings, including pre-Coastal Act structures such as Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, establish an existing mid-rise pattern along the commercial corridors. While the immediate block averages approximately 1.8 stories, that average does not reflect the full development context of Main Street and nearby corridors, where three- and four-story buildings already exist. The project incorporates articulated façades, step backs, balcony recesses, and a setback rooftop deck to reduce perceived massing and minimize visual impacts from the public right-of-way. In this context, the project reflects Venice's established eclectic mid-rise character and remains visually compatible consistent with Coastal Act Section 30251.

2. ***The Venice Coastal Development Project is in Conformity with the Certified Venice Local Coastal Program.***

A Local Coastal Program is comprised of a Land Use Plan and Implementation Plan, certified by the California Coastal Commission. The Venice Local Coastal Land Use Plan ("LUP") was certified by the Coastal Commission on June 14, 2001, however, the necessary Implementation Plan was not certified. The proposed project conforms to the applicable policies of the certified Venice LUP, as outlined in Finding No. 2.b.

3. ***The applicant has guaranteed to keep the rent levels of any Replacement Affordable Units at an affordable level for the life of the proposed project and to register the Replacement Affordable Unit with the Los Angeles Housing Department.***

Per the Mello Act Determination letter, dated May 18, 2022, the Los Angeles Housing Department has determined that no affordable units exist at the subject site. The subject site consists of a vacant lot and two single-family dwellings. The owner filed an application with City Planning on March 21, 2021. LAHD collected monthly housing cost data for at least the previous three (3) years from March 2018 to March 2021. The Rent Stabilization Ordinance ("RSO") Unit confirmed that 1410 South Main Street has been a vacant lot since March 2018. 1414 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $ 3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018 - 2021 for a Moderate Level two (2) bedroom unit is $ 1,854, therefore the unit was rented at above affordable levels from March 201 8 - March 2021. 1418 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $ 3,551. The average Land Use Schedule 7 Maximum Allowable Rent for the years 201 8 -2021 for a Moderate Level two (2) bedroom unit is $ 1,854, therefore the unit was rented above affordable levels from March 201 8 - March 2021. The data collected from March 2018 - March 2021 shows that no affordable units exist at 1410 - 1418 South Main Street. Also see Finding No. 5.

4. ***The Venice Coastal Development Project is consistent with the special requirements for low- and moderate-income housing units in the Venice Coastal Zone as mandated by California Government Code Section 65590 (Mello Act).***

Inclusionary Residential Units are required for this project. The project proposes the construction of 20 new Residential Units. Pursuant to Part 5 of the Interim Administrative Procedures, development which consists of 10 or greater Residential Units are New Housing Developments and are required to provide Inclusionary Residential Units. The proposed development of 20 new Residential Units provides four (4) affordable units, of which two (2) are Inclusionary Residential units. Therefore, the project provides the required affordable units under the Mello Act. See Finding No. 5.

In addition to the requisite findings set forth in Section 8.C of the Specific Plan, the project also complies with all applicable provisions of the Specific Plan, as set forth below:

B. Section 9. General Land Use and Development Regulations

1. *Lot Consolidation. Lot consolidation of more than two lots shall be permitted for mixed-use and multi-family residential Venice Coastal Development Projects, provided the project conforms to the existing scale and characteristic of the surrounding community, the required parking is onsite, and the project conforms to developments standards in Section 9.A.2 of the Specific Plan.*

The proposed project consists of the consolidation of three (3) residential lots for the construction of a five-story, 26,889 square foot, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households, 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean garage. As discussed in Finding No. 1 and 2, the project qualifies for as a Density Bonus Housing Development Project pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program) and LAMC Section 12.24-U.26. The project will utilize Land Use Policy I.B.7 where there are three lots with subterranean. Mixed use projects are permitted the consolidation of more than

two lots if they conform to the existing scale and character of the surrounding community and provide adequate onsite parking. As discussed previously, the project is in line with midrise structures within a half mile of the project site that range in height from four to five stories. In addition, the project is eligible for AB 2097 and the City is not able to require additional parking for commercial and residential structures.

2. *Height. Height shall be measured from the centerline of the street or alley or walk adjacent to the front lot line measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building.*

   As shown in "Exhibit A", the height of the structure is measured from the centerline of Main Street and conforms to standard of measurement.

3. Roof Structures. Roof Access Structures shall not exceed the Flat Roof height limit by more than ten feet regardless of roof type. The project site proposes a 10-foot roof access structure with solar trellis, where building height is measured to the top of the solar trellis. As such, the project complies with Section 9.B. of the Specific Plan.

C. *Sections 10.F. Land Use and Development Regulations for North Venice Subarea*

1. *Density.* Projects in the North Venice Subarea on a commercially zoned lot shall exceed the density permitted in the R3 Zone.

   As discussed in Finding No. 2, the project qualifies for an On-Menu Incentive for height pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 (Density Bonus Affordable Housing Program). The project requests approval of a Density Bonus and the project propose 20 dwelling units, with four (4) affordable units, of which two (2) are considered Inclusionary Replacement Units. The project's proposed density is greater than 25 percent and as discussed in Finding No. 2, will not have any adverse effects on coastal resources.

2. *Height. Projects with a flat roof shall not exceed a maximum height of 30 feet. Projects with a varied roofline shall not exceed a maximum height of 35 feet.* The project proposes a Flat Roof with a maximum height of 52 feet 10 inches. As discussed in Finding No. 2, the project qualifies for a Waiver of Development Standards for height pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 (Density Bonus Affordable Housing Program).

   Pursuant to the Venice Specific Plan North Venice Subarea, Venice Coastal Development Projects with flat roofs may be up to 30 feet in height. The project's proposed height is measured from the centerline of Main Street. With approval of the Density Bonus incentive, the project complies with the height provisions of the Specific Plan. The height increase is also consistent with the mass and scale of existing buildings within half a mile of the project site with residential and commercial structures ranging from four to five stories.

3. *Access.* Driveways and vehicular access to Venice Coastal Development Projects shall be provided from alleys, unless the Department of Transportation determines that it is not Feasible. As shown in "Exhibit A", the proposed project maintains vehicle access from the abutting rear alley.

D. Section 11 – Commercial Design Standard

1. *Ground Floor Commercial Development. Pursuant to the Venice Coastal Specific Plan, all commercial Venice Coastal Development Projects which fronts on Ocean Front Walk shall include a street wall which extends a minimum of 65 percent of the length of the Building Frontage, is set back zero feet from the building line, with a minimum height of 13 feet. In addition, a minimum of 50 percent of the area of the Ground Floor Street Wall of a commercial Venice Coastal Development Project shall be devoted to pedestrian entrances or windows; and there shall be at least one pedestrian entrance into each business or use for each Store Frontage.* As proposed, two restaurants and one take out restaurant will be located on the Ground Floor of the new mixed-use building observing no setback from the building line. The commercial portion of the Street Wall has a height of 13 feet as required. The Street Wall that the restaurant and take out restaurant spaces will occupy is approximately 91 percent of the ground floor. A pedestrian walkway and entrance are provided for the restaurant from the front of the structure along Main Street. Therefore, the project complies with the ground floor commercial development provisions of the Plan.

2. *Floor Area Ratio.* As discussed in Finding No. 2, the project qualifies for an off-menu incentive, pursuant to LAMC Section 12.22 A.25 (Density Bonus Affordable Housing Program), for an FAR increase of 97.3 percent. The project proposes a FAR of 2.96:1 and a total lot area of 26,889 square feet.

3. *Access.* The project will provide access to the project site from the abutting alley. No new curb cuts are proposed along Main Street and all on-street parking opportunities will be maintained.

4. *Landscaping.* The project provides approximately 1,106 square feet of usable common open space on the roof deck of the structure. The project provides four new street trees.

5. *Light.* Any lighting is downward facing and is directed away from existing residential structures. The project is not located near Environmentally Sensitive Habitat Areas.

6. *Trash.* A residential and commercial trash enclosure/room is located at the ground level and includes regular trash and recycling chutes on all levels.

E. Section 13 – Parking

Pursuant to Section 13.D of the Specific Plan, restaurants shall provide one space per 50 square feet, window service restaurants shall provide one space per 50 square feet, office uses shall provide one space per 250 square feet, multi-family dwellings on a lot with a width of 40 feet or more shall provide two spaces for each dwelling unit, plus a minimum of one guest parking space for each four or fewer units, and Beach Impact Parking shall provide one space for each 640 square feet of floor area of the Ground Floor for commercial and industrial Venice Coastal Development Projects. As such, a total of 118 (73 Commercial and 45 Residential) parking spaces is required. However, the proposed project is located within a major transit stop (ZIMAS) and therefore, under Assembly Bill 2097 (AB 2097), the proposed project is not required to provide commercial or residential parking spaces, however, the proposed project will provide 28 vehicle parking spaces and 45 bicycle parking spaces to assist with mitigating any impacts around the project site.

b. The project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible.

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32). A full discussion is provided in Finding No. 5. The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit D.

Therefore, no mitigation measures or alternatives were identified in the environmental review.

Mello Act Compliance Review

5. **Mello Act Compliance Review.** Pursuant to the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act (IAP), all Conversions, Demolitions, and New Housing Developments must be identified in order to determine if any Affordable Residential Units are onsite and must be maintained, and if the project is subject to the Inclusionary Residential Units requirement. Accordingly, pursuant to the settlement agreement between the City of Los Angeles and the Venice Town Council, Inc., the Barton Hill Neighborhood Organization, and Carol Berman concerning implementation of the Mello Act in the Coastal Zone Portions of the City of Los Angeles, the findings are as follows:

a. Demolitions and Conversions (Part 4.0)

The project consists of the demolition of two Residential Units and the construction of 20 Residential Units in the Coastal Zone. The owner filed an application with the Department of City Planning on March 11,2021. Therefore, the Los Angeles Housing Department collected data from March 2018 to March 2021. Since March 2018, the property at 1410 South Main Street has been a vacant lot. 1414 South Main Street was rented during a look back period at an average amount of $3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018-2021 for a Moderate Level two (2) bedroom unit is $1,854, therefore the unit was rented at above affordable levels from March 2018 – March 2021. As such, the data collected from March 2018 – March 2021 shows that no affordable units exist on site. Therefore, no Affordable Replacement Units are required.

b. New Housing Developments (Part 5.0)

Part 5.0 of the IAP requires New Housing Developments of 10 or more Residential Units to provide Inclusionary Residential Units and provides two options:

- Option 1 requires 20 percent of all Residential Units, be reserved for occupancy by Very Low or Low Income Households.

- Option 2 requires 10 percent of all Residential units, be reserved for occupancy by Very Low Income Households.

The applicant proposes the construction of 20 Residential Units, of which four (4) units will be set aside for Very Low Income Households for a period of 55 years. The project satisfies Option 2 of Part 5.0 of the IAP and the requirements of LAMC Section 12.22 A.37. The four affordable units are required to satisfy the requirements of the requested Density Bonus Incentives and Waivers. Therefore, they are subject to the requirements of LAMC Section 16.60 (RPO).

CEQA Findings

6. Environmental Findings

A Categorical Exemption, ENV-2021-2021-CE, has been prepared for the proposed project consistent, with the provisions of the California Environmental Quality Act. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class1) and 15332 (Class 32).

The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit D.

The Class 1 Categorical Exemption allows for demolition and removal of individual small structures such as a duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The project proposed the demolition of two dwelling units and therefore qualifies for an exemption of this Class.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria: a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; c) The project site has no value as habitat for endangered, rare or threatened species; d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and e) The site can be adequately served by all required utilities and public services. The project qualifies for a Class 32 Categorical Exemption as an infill project, as evidenced below:

CEQA Determination – Class 32 Categorical Exemption Applies

a. **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.**

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations: The site is zoned C2-1-O and has a General Plan Land Use Designation of Neighborhood Office Commercial. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces and is in conformance with the General Plan and Zoning Designation.

b. **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The site is wholly within the City of Los Angeles, and is completely surrounded by urban uses. Surrounding properties include and multi-story residential uses.

c. **The project site has no value as a habitat for endangered, rare, or threatened species.**

The project site has no value as habitat for endangered, rare or threatened species. The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species: The area around the site is highly urbanized and surrounded by residential uses. NavigateLA shows that the subject site is not located in a Significant Ecological Area. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952 and has no value as a habitat for endangered, rare or threatened species.

d. **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance for pollutant discharge, dewatering, and stormwater mitigations; and Best Management Practices for stormwater runoff. More specifically, RCMs include but are not limited to:

- **Regulatory Compliance Measure RC-AQ-1 (Demolition, Grading and Construction Activities): Compliance with provisions of the Southern California Air Quality Management District (SCAQMD) District Rule 403.** The project shall comply with all applicable standards of the SCAQMD, including the following provisions of District Rule 403:

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), to prevent excessive amounts of dust.

- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

- General contractors shall maintain and operate construction equipment to minimize exhaust emissions.

- Trucks having no current hauling activity shall not idle but be turned off.

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

These RCMs will reduce any potential impacts on noise and water quality. Furthermore, the project does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) for preparing a traffic study. The project will not conflict with any adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities. Therefore, the project will not have any significant impacts to traffic. Likewise, air quality will not worsen as a result of the proposed project. Interim thresholds were developed by DCP staff based on CalEEMod model runs relying on reasonable assumptions, consulting with SCAQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. **The site can be adequately served by all required utilities and public services.**

The project site will be adequately served by all public utilities and services given that the property was previously developed with commercial uses surrounded by urban uses, served by existing infrastructure, and is consistent with the General Plan.

The project is a transit-oriented, infill development on a site within an urbanized area and meets the criteria outlined above. Therefore, the project qualifies for a Class 32 Categorical Exemption.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

The City has considered whether the proposed Project is subject to any of the six (6) exceptions that would prohibit the use of a categorical exemption as set forth in State CEQA Guidelines Section 15300.2. The six (6) exceptions to this Exemption are: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

a. **Cumulative Impacts.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

   The project is consistent with the type of development permitted for the area zoned C2-1-O and designated Neighborhood Office Commercial. The proposed project has submitted a Parking Demand Study and Noise Report to indicate no significant impacts will be made as a result of this project. As such, the proposed project will not exceed thresholds identified for impacts to the area (i.e., traffic, noise, etc.) and will not result in significant cumulative impacts.

b. **Significant Effect Due to Unusual Circumstances.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

   The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The surrounding area is developed with similar residential and commercial uses. There are 9 existing midrise buildings within 0.5 miles of the project site that range between four to five stories. The proposed height and massing are not unusual for the project vicinity or the nearby Windward Circle. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

c. **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

   The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. State Route 27 is located more than 7 miles northwest of the project site. Therefore, the project will not impact a designated state scenic highway.

d. **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The project site is not identified as a hazardous waste site or is on any list compiled pursuant to Section 65962.5 of the Government Code.

e. **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

ADDITIONAL MANDATORY FINDING

8. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone AE, areas of One Hundred-Year Flood where the Base Flood elevations and Flood Hazard factors have been determined.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing was held virtually via Zoom on December 10, 2025 at 1:00 pm. The hearing was conducted by the Hearing Officer, Ira Brown, on behalf of the City Planning Commission in taking testimony for Case No. CPC-2021-2020-DB-CDP-SPPC-MEL-HCA and ENV-2021-2021-CE. All interested parties were invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project. The purpose of the hearing was to obtain testimony from affected and/or interested parties regarding this application. Interested parties are also invited to submit written comments regarding the request prior to the hearing. Due to a revision in the project's scope of work, a new public hearing is required. The public hearing was attended by the applicant's representatives and 12 members of the public.

Applicant Presentation:

- Nick Leathers, Crest Real Estate – Applicant's representative, provides overview of the project, clarifies new housing with walkability along Main Street, clarifies affordability of the four (4) dwelling units will be Very Low Income, clarifies pedestrian and vehicle access to the project site.

Public Comment:

- David Ewing – Venice Resident, indicates Coastal Act is implemented through the LUP and takes precedence over City Law. Clarifies that the purpose of open space is not just for residence but is also for the surrounding public area. Stated what strikes him the most about the project is the number of waivers requested. Lastly, confirmed the VNC voted unanimously against the project.

- Mark Mack – Chair of VNC LUPC, VNC formally requests to postpone the hearing for this project as they deny the project based on vehicle accessibility, height of project, lot consolidation, no public setback along Main Street, unlawful loss and conversion of coastal housing, accessibility and life-safety concerns, complete failure to provide usable open space, poor design and incompatibility with the historic, special coastal community context, and significant adverse impact on coastal access and parking.

- Margaret Molloy – Agrees with the previous two speakers and is against the proposed project. Stated during the LUPC meeting, the property was found to be 12 feet from the street edge and the applicant constructed a fence on the property line and obtained a R permit for the fence. Stated the comparative massing shown in the presentation shows two projects in a commercially zoned area and 720 Rose is a 100% affordable project. The proposed project violates height, mass, and character of Venice and abuts an entirely neighborhood area. Further clarifies the project must protect single family residences and the alley is substandard and the only path of travel and commercial parking on the project site.

- Roberto Tonkin – Adjacent property owner, indicated the abutting alleyway will be difficult to park and pass while using Toledo Court and there would be no way to easily operate safely in case of fire or emergency access as the alley is the only way to access neighboring properties.

- Irv Katz – Adjacent property owner, proposed project will impede in the air space above 1410 Main Street, four restaurants bringing hourly trucks for loading and unloading will be troublesome to the alleyway, trash pickup will be loud and just below bedrooms nearby, there are already enough bars and restaurants within the neighborhood.

- Steve Bavilacqua – Adjacent neighbor, confirms with VNC decision to deny the project, emphasizes the impact four restaurants and a bar would have on the neighborhood with extra trash pickup.

- Kathleen Rawson – Property owner nearby, claims the applicant has not been a good neighbor, no community outreach for the proposed project, still the same proposal as previous years with the same problems: 1. Upper floor restaurants make no sense, 2. Roof top space cannot be commercial and would be invasive on nearby neighbors, 3. Toledo Court is a blind turn. Completely opposed.

- Cindy Chambers – Venice Resident with multiple disabilities and spends a great amount of time in the neighborhood. Discusses parking issues, deep excavation as this area is located within a high-water table and can cause water intrusion, vibrations, intrusion, pump failure, water management issues once constructed. Supportive of affordable housing in the area, but anything involving deep excavation should be reviewed for safety.

- Robin Rudisill – Speaking as an individual. Incentives must be harmonized with the Coastal Act. Incentives requested are double the FAR and would harm coastal resources, less massing structure would be a conforming structure, the project violates the Mello Act, and the Mello Act states that you cannot demolish a structure for a mixed-use structure unless the structure is not feasible or livable. Also claims compliant parking is needed. Asks the City deny the project and ask the applicant to comply and work with the neighbors that would benefit all.

- Mike Bravo – 5th generation Venice resident. LUPC and VNC denied the project with concerns clear. States lack of transparency and incomplete information and incompatibility with the surrounding uses.

- Michael Grady – Nearby resident, states the property across the street was constructed as a live-work structure with subterranean parking, the proposed project is not in line with anything in the area. Eliminating restaurant or retail that would cause interruption to the neighborhood as it abuts residential uses at the rear and side. Claims the proposed five stories with restaurants is ridiculous and any residents in the area will have their property values impacted.

- Rick Garvey – Nearby resident, states the front door will open to the alley, the proposed development is out of scale and mass, provided history of the project site, confirmed in 2021 they conducted public outreach to give the public the opportunity to speak, the proposed project today Is larger. The transportation study provided was done many years ago during covid and did not include the restaurant. Confirms the concern for parking, impact of no visitor parking, located two blocks from the beach in a high traffic tourist area with no available street parking, the alley is 14 feet with trash cans on either side of the alley during trash day, and no space for two cars to drive on the same street.

- Sean Silva of CD 11 was present but did not speak on the project.

In response to public testimony, the applicant team provided the following response:

- Tony Russo – Applicant's representative, indicated the comments from LUPC were discussed during the meeting. The representative responded to comments regarding the alley, indicating the abutting alleyways of Toledo and Riviera could be accessed from Market and exit off of Horizon, and that the City could impose additional conditions regarding usage. He further clarified that there would be no reduction in open space and clarified the parking study was completed recently within the last few months. He further indicated the study City Staff has on file is the most recent study where it detailed concerns such as access. At the time of the study, they observed there were not as many vehicles accessing the alley. The representative confirmed the existing fence off of Main Street did obtain an R permit but would be removed as part of this project and the new structure would enhance the parkway and provide more depth along the walkway. The representative confirmed the existing site conditions and that there would be ample time to discuss with the applicant and design team about the remaining concerns.

The Hearing Officer indicated that the revised plans will need to be submitted prior to the tentatively scheduled City Planning Commission hearing.

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit A: Maps

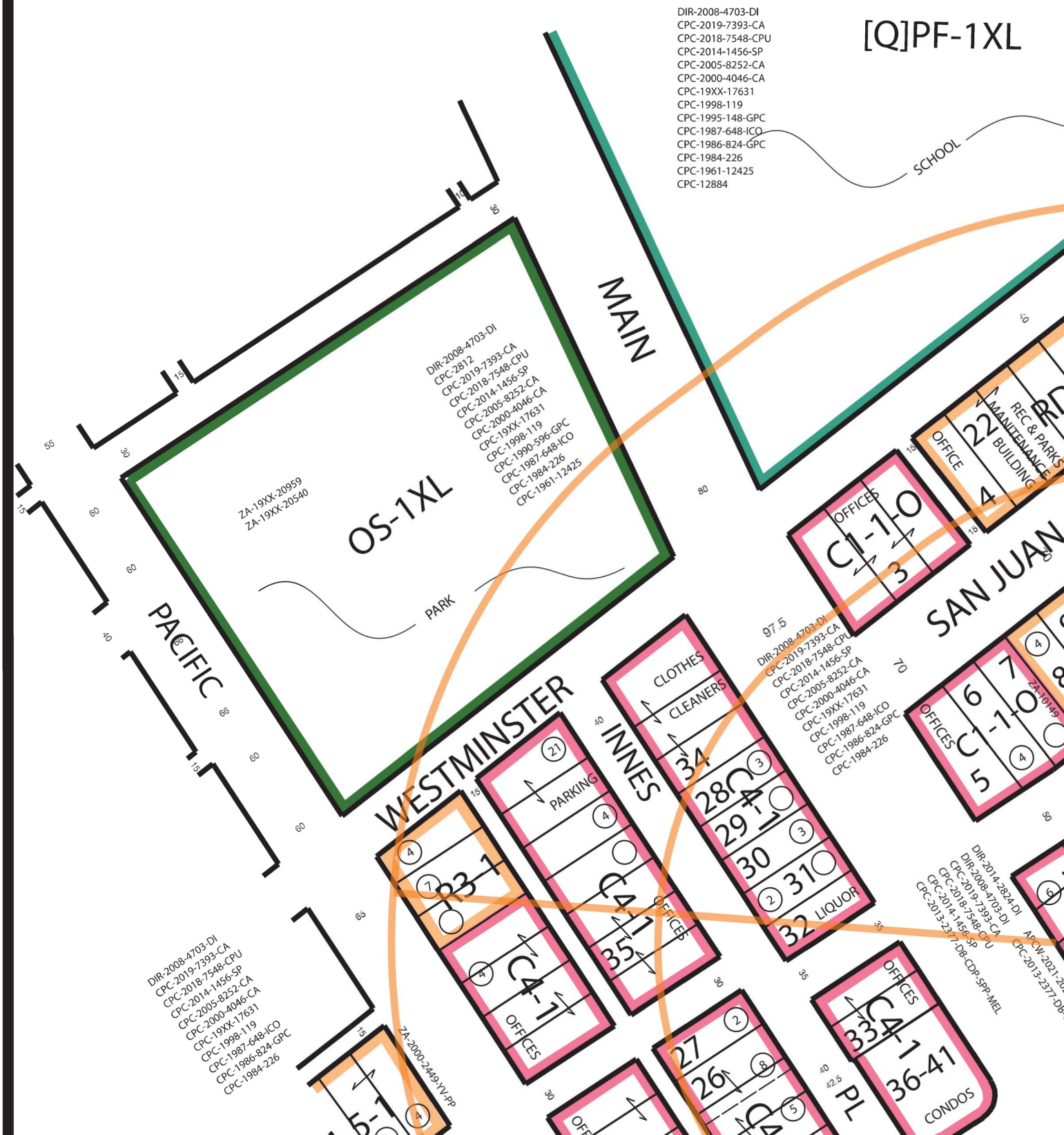
A.1 – Vicinity Map
A.2 – Radius Map
A.3 – Zoning Map
A.4 – Land Use Designation Map

Vicinity Map



Address: 1410, 1414, 1422 MAIN ST

QMS #25-103

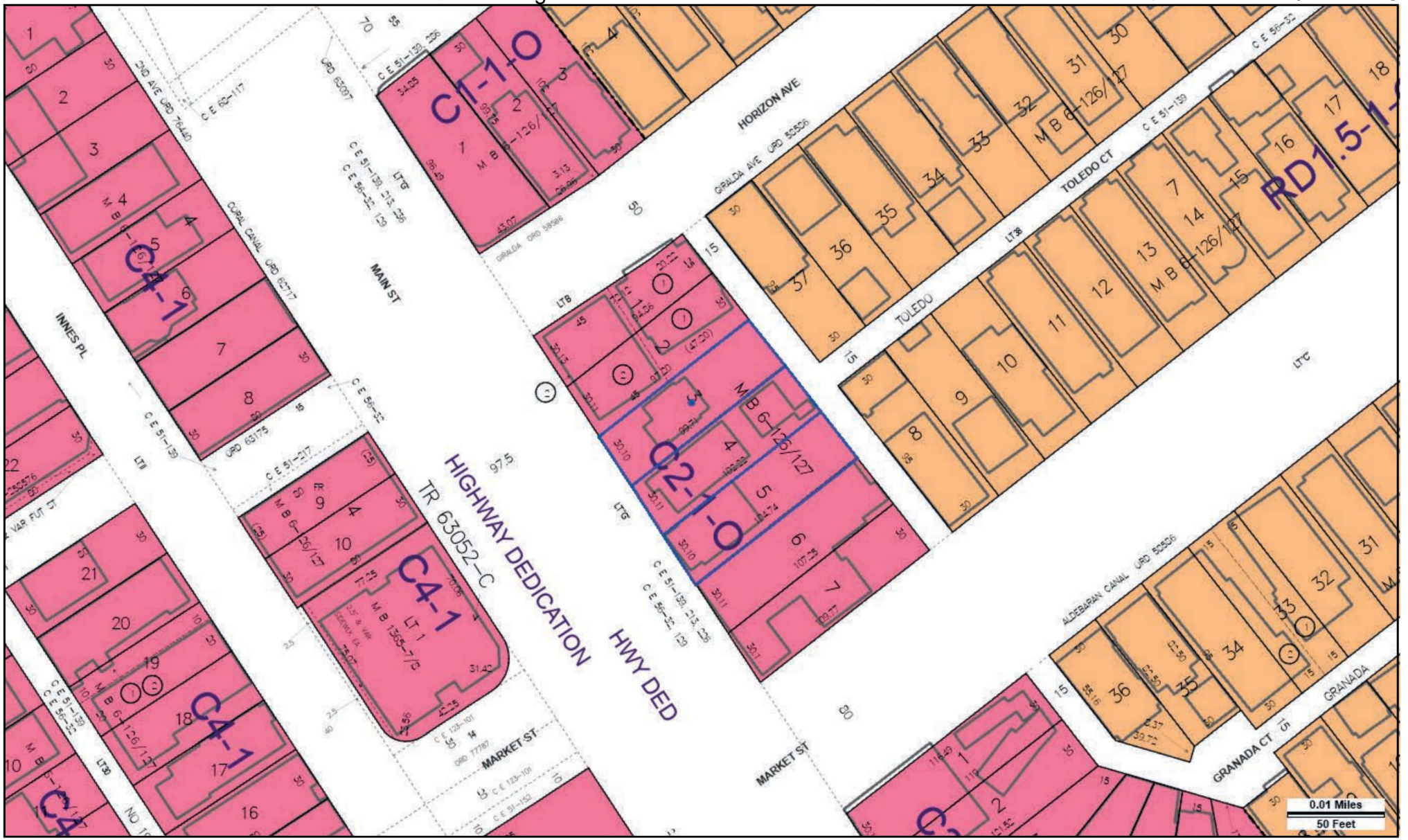

[Q]PF-1XL
DIR-2008-4703-DI
CPC-2019-7393-CA
CPC-2018-7548-CPU
CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-19XX-17631
CPC-1998-119
CPC-1995-148-GPC
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226
CPC-1961-12425
CPC-12884
SCHOOL
MAIN
OS-1XL
ZA-19XX-20959
ZA-19XX-20540
PARK
PACIFIC
WESTMINSTER
INNES
SAN JUAN
OFFICE
REC & PARKS MAINTENANCE BUILDING
OFFICES
C1-1-O
CLOTHES CLEANERS
PARKING
LIQUOR
C4-1
R3-1
PL
CONDOS
ZA-2000-2449-YV-PP
DIR-2014-2824-DI
APCW-2021-202
CPC-2013-2277-DB

ZIMAS PUBLIC

Generalized Zoning

03/02/2026

City of Los Angeles
Department of City Planning



Address: 1410 S MAIN ST
APN: 4238012003
PIN #: 108B145 1701

Tract: VENICE OF AMERICA
Block: 7
Lot: 3
Arb: None

Zoning: C2-1-O
General Plan: Neighborhood Office Commercial

N
W
E
S



Exhibit 10a

Land Use Plan (Map): North Venice • Venice Canals

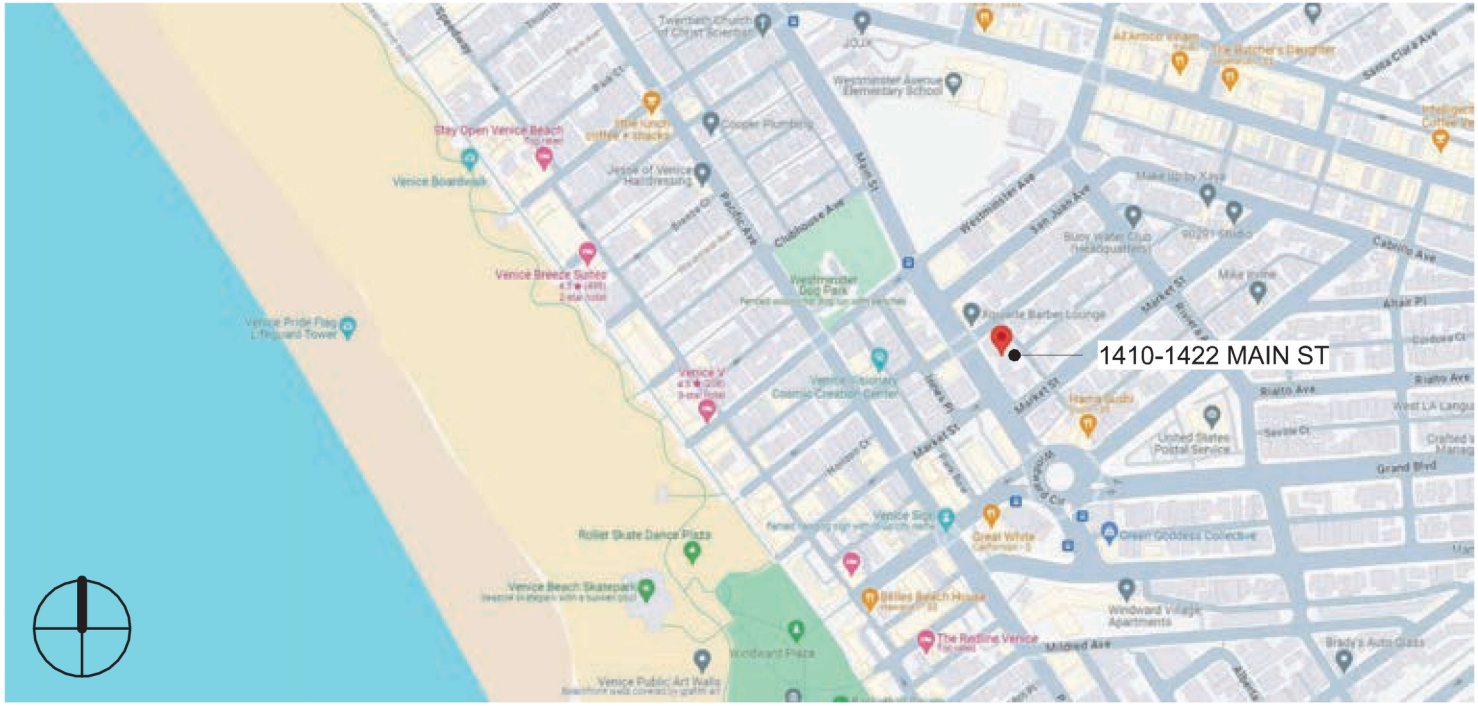
Not to Scale

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit B: Plans

B.1 – Project Plans
B.2 – Landscape Plans

VICINITY MAP



ARCHITECTURAL SYMBOLS LEGEND

(E)	**Existing**	VIF	**Verify In Field**
TYP	**Typical**		**North Arrow**
℄	**Center Line**	Room name 101	**Room Tag**
T	**Tempered**		**Level Head**
	Align	Sm/Cm	**Smoke/Carbon Monoxide Detector**
1t	**Door Mark**		**Exhaust Fan, TYP.**

ADDRESS:

ZONING:

APN #:

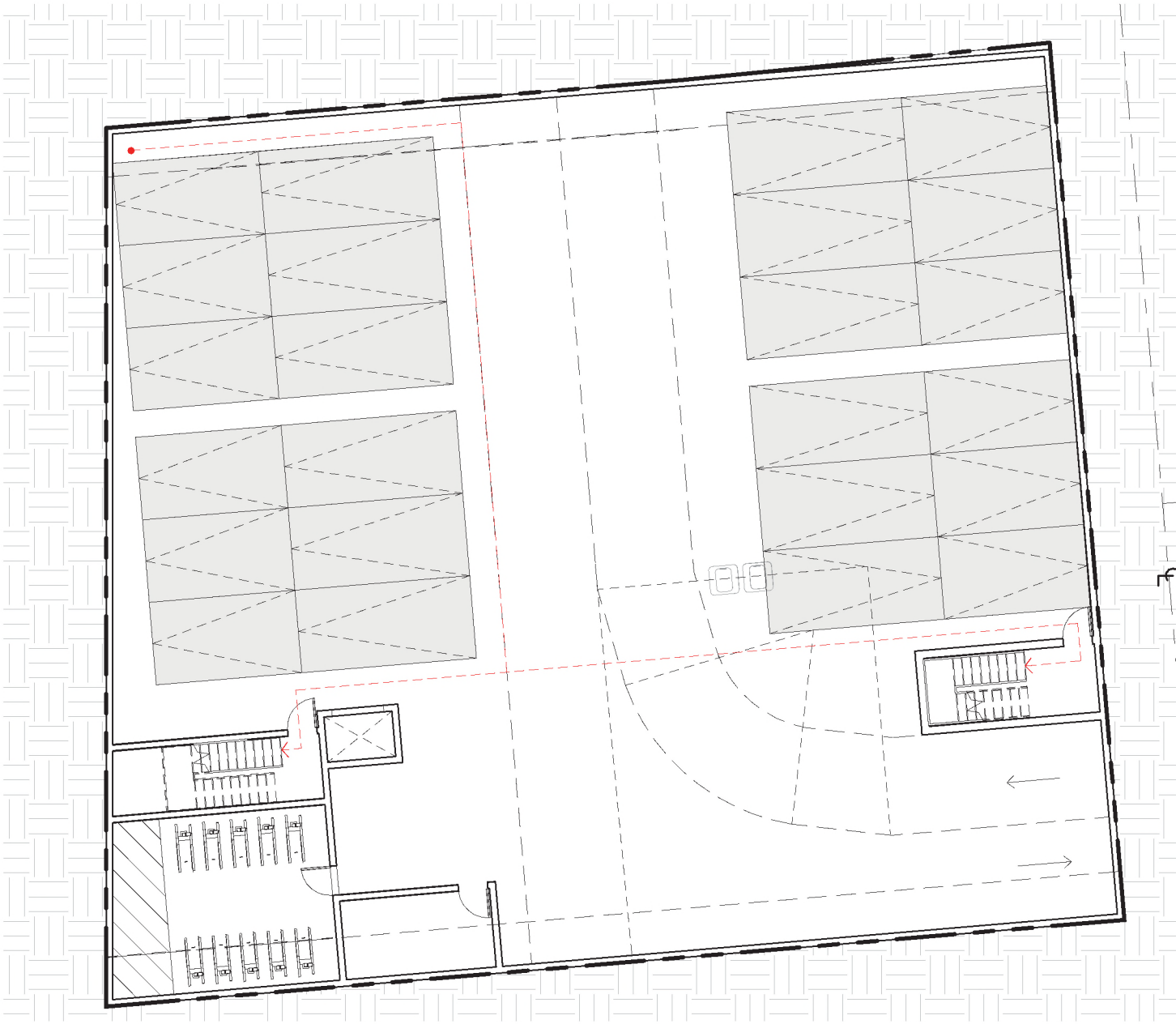
LEGAL DESCRIPT

MAP REFERENCE

LOT AREA:

EXISTING BUILDIN
USE:

BUILDING SETBAC



1 LV B1 PARKING - AREA PLAN
1/16" = 1'-0"

LAMC 12.21 G.2.(a)(3)
A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway. For a surface area not located directly on finished grade that is used for common open space, and located at ground level or the first habitable room level, shrubs and/or trees shall be contained within permanent planters at least 30-inches in depth, and lawn or ground cover shall be at least 12-inches in depth. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained.

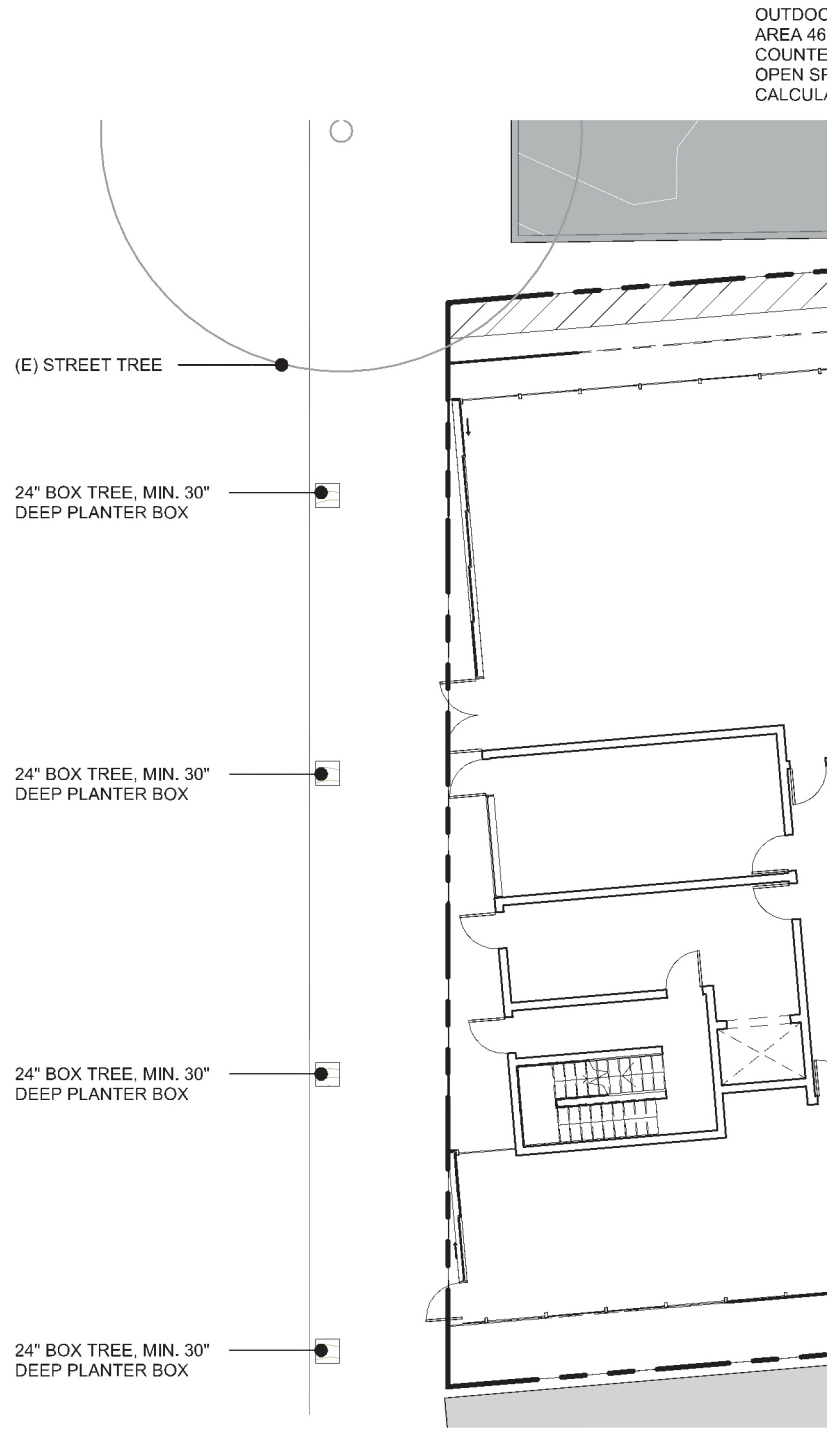
REQUIRED OPEN SPACE:
5XSTUDIO = 1 HABIT. ROOM = 5X100 = 500 SF
5X1 BR = 2 HABIT. ROOMS = 5X100 = 500 SF
10X2 BR = 3 HABIT. ROOMS = 10X125 SF = 1,250 SF

TOTAL REQUIRED OPEN SPACE = **2,250 SF**

PROVIDED OPEN SPACE:
2,883 SF COMMON OPEN SPACE ON ROOF DECK
(1,106 SF LANDSCAPED)

TOTAL PROVIDED OPEN SPACE = **2,883 SF**
% LANDSCAPED OPEN SPACE =
1,106 / 2,883 = **38.3%**

PROPOSED TREES:
1 STREET TREE + 4 24-INCH BOX TREES ON SITE =
5 TREES PROPOSED (REQUIRED = 5)



City of Los Angeles
Department of City Planning

11/10/2024
PARCEL PROFILE REPORT

PROPERTY ADDRESSES

1410 S MAIN ST

ZIP CODES

90291

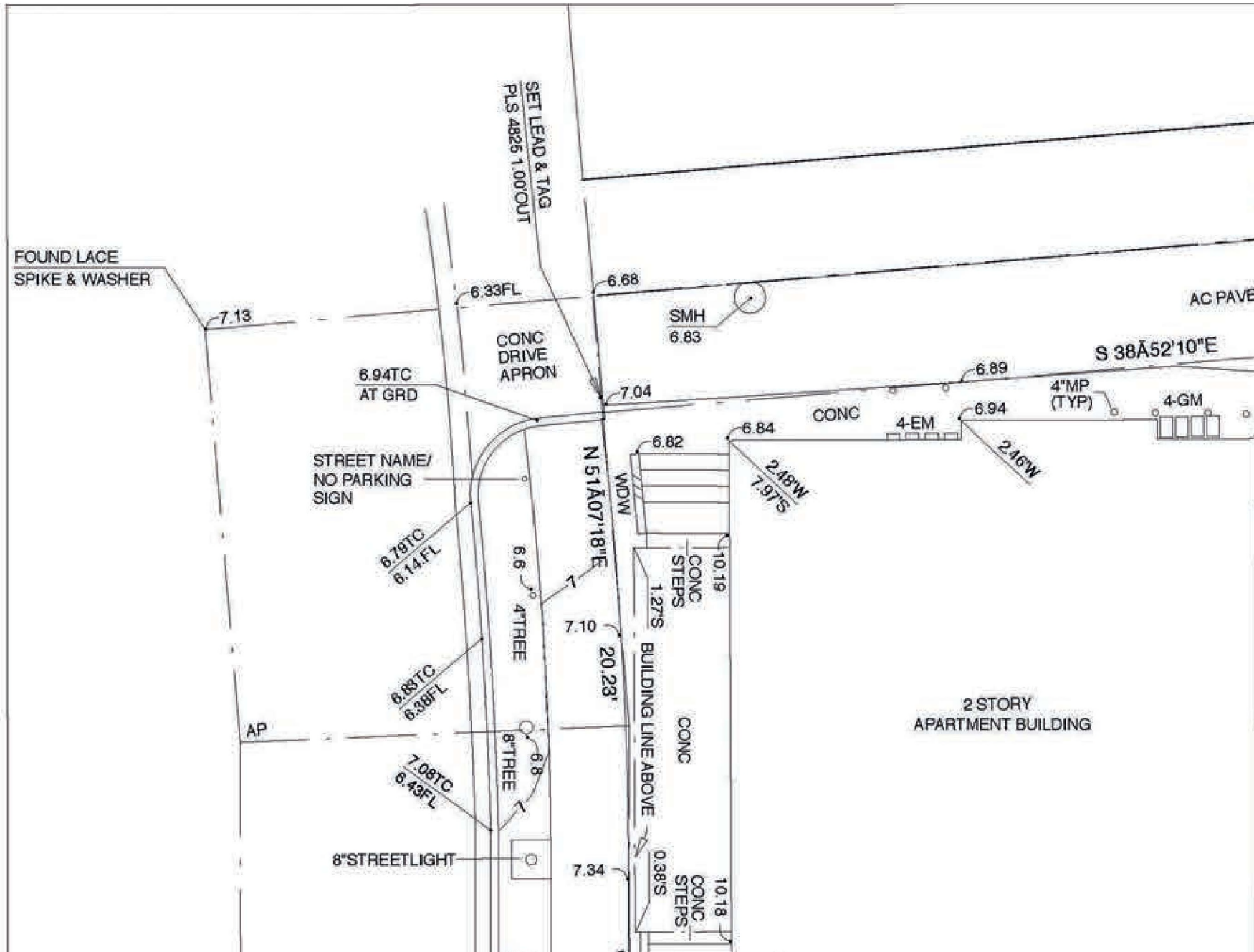
RECENT ACTIVITY

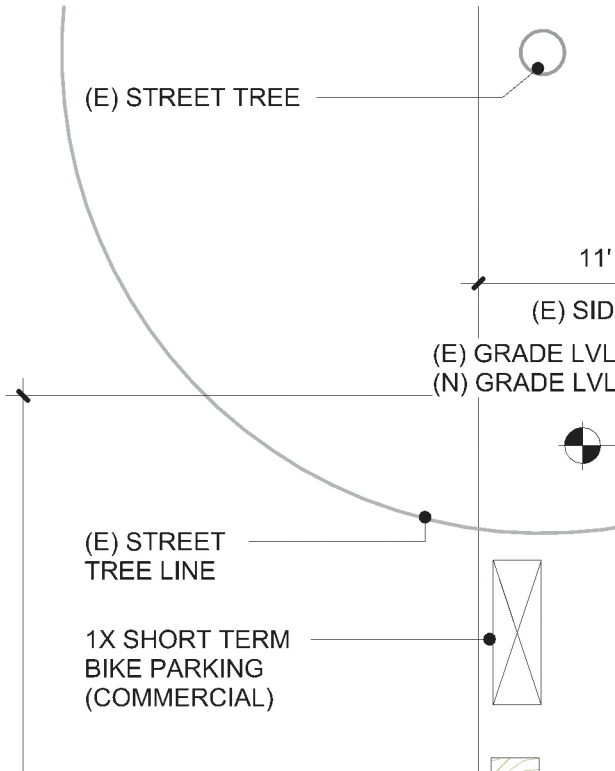
None

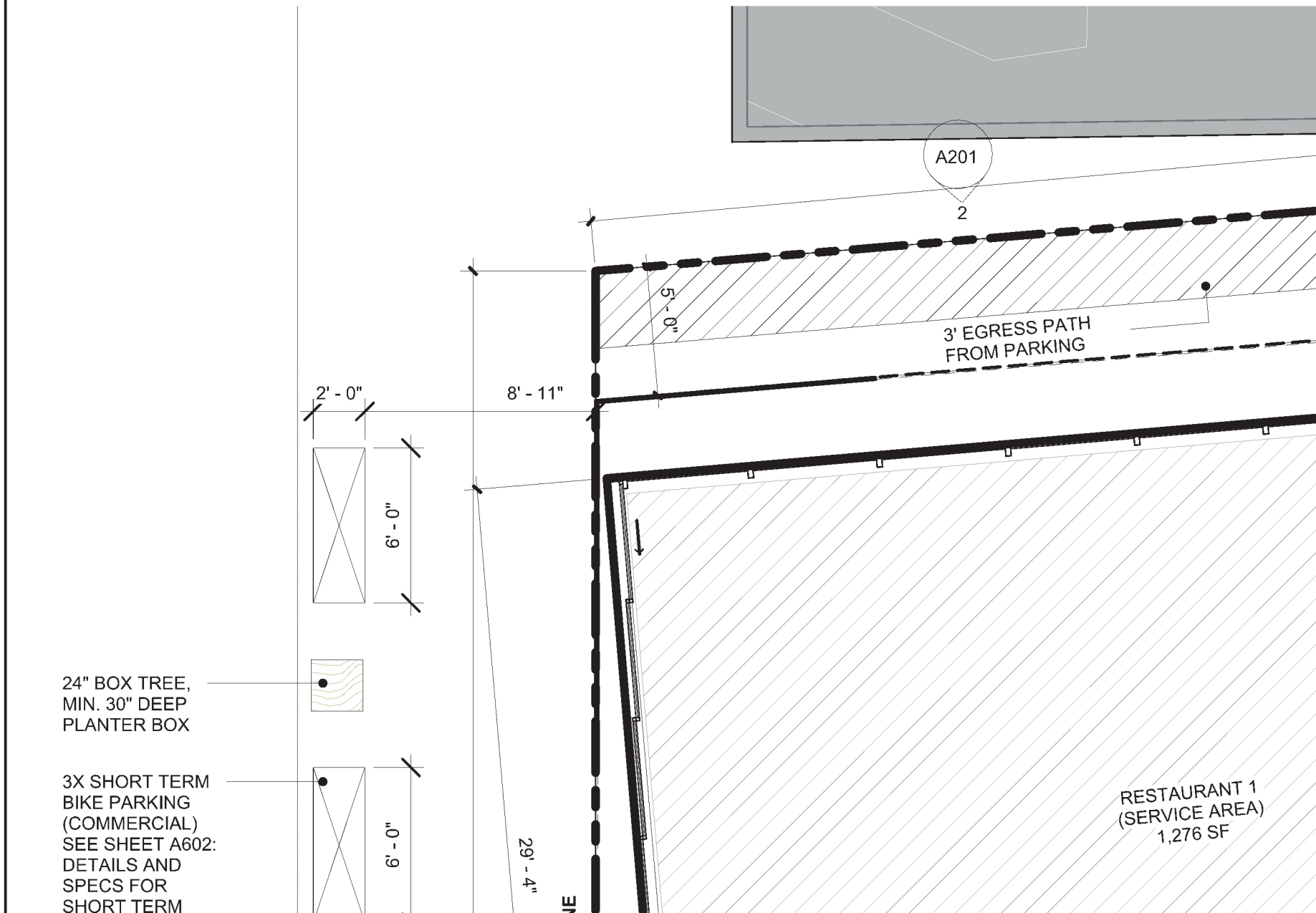
CASE NUMBERS

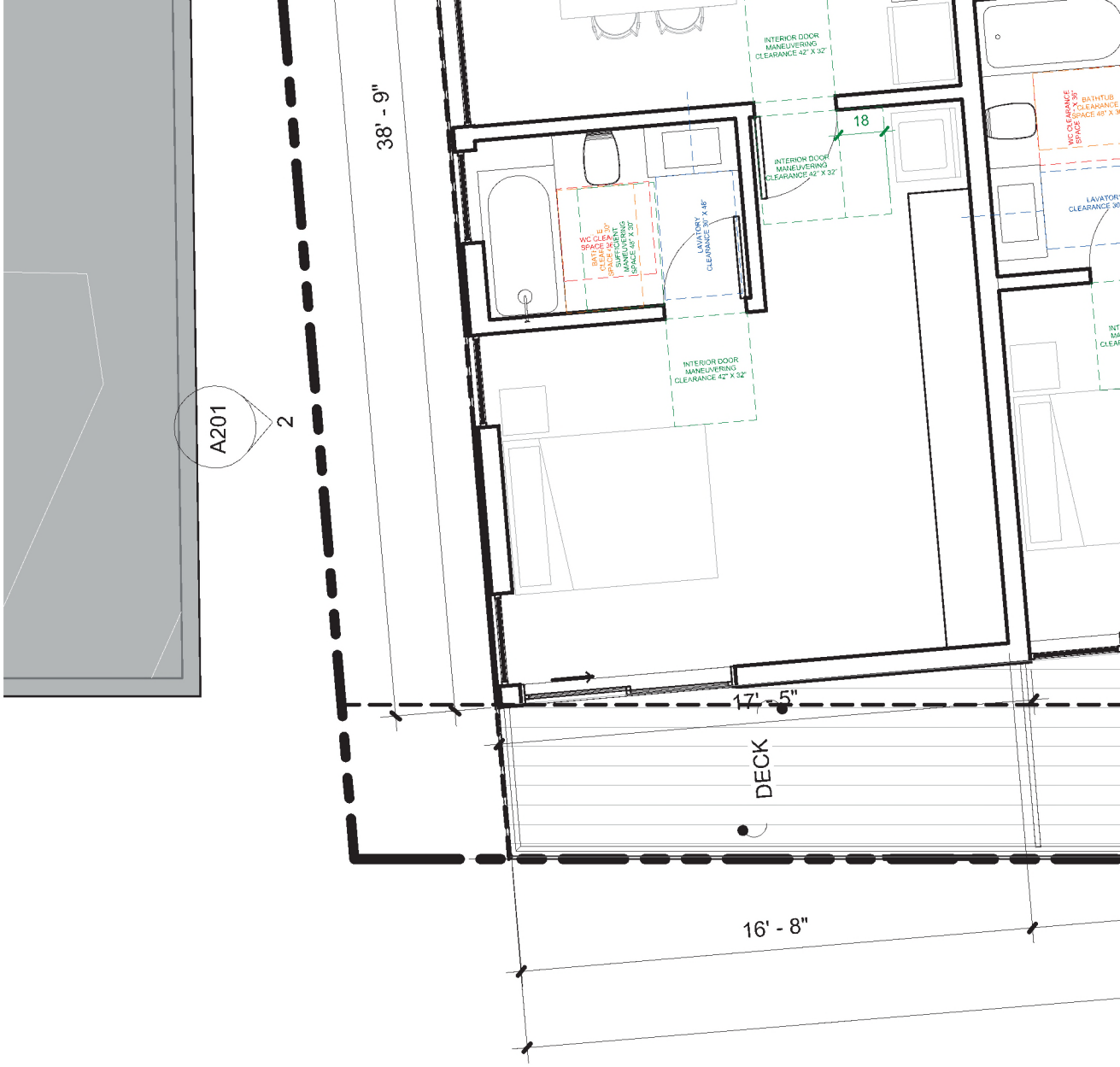
APCW-2021-2020-CDP-MEL-SPE-SPP-WDI
CPC-2019-7393-CA
CPC-2018-7548-CPU
CPC-2014-1456-SP
CPC-2013-2377-DB-CDP-SPP-MEL
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1987-648-ICO
CPC-1984-226
CPC-17630
ORD-186104
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-168999
ORD-130336
DIR-2014-2824-DI
DIR-2008-4703-DI
DIR-2008-3681-DI
ENV-2021-2021-EAF

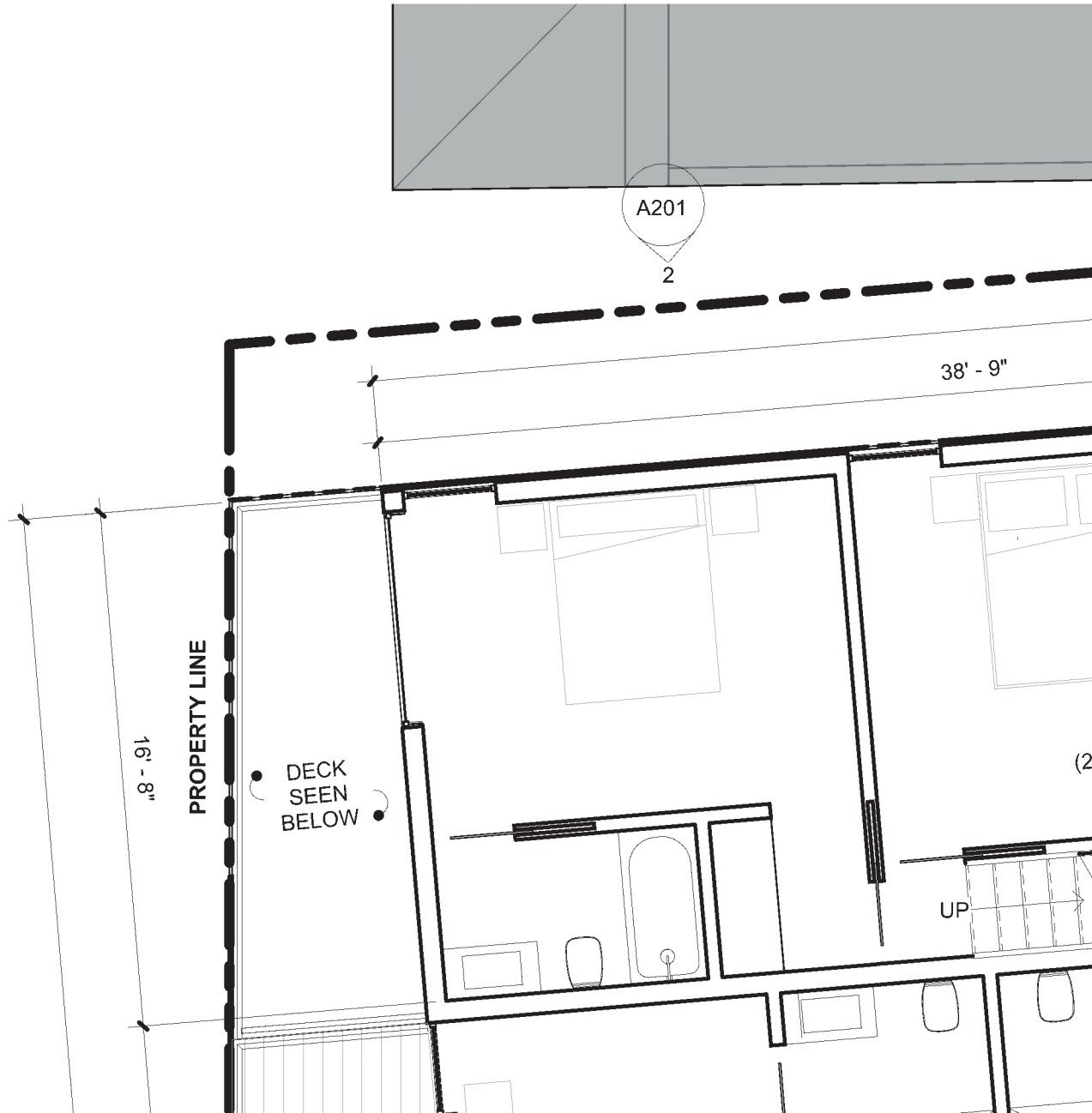
Address/Legal Information	
PIN Number	108B145 1701
Lot/Parcel Area (Calculated)	2,954.6 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238012003
Tract	VENICE OF AMERICA
Map Reference	M B 6-126/127
Block	7
Lot	3
Arb (Lot Cut Reference)	None
Map Sheet	108A143
	108B145
Jurisdictional Information	
Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Traci Park
Census Tract #	2735.02
LADBS District Office	West Los Angeles
Permitting and Zoning Compliance Information	
Administrative Review	None
Planning and Zoning Information	
Special Notes	None
Zoning	C2-1-O
Zoning Information (ZI)	ZI-1874 Specific Plan: Los Angeles Coastal Transportation Corridor
	ZI-2273 Specific Plan: Venice Coastal Zone
	ZI-2453 SurveyLA - Lost Venice Canals Historic District
	ZI-2517 Al Fresco Ordinance within Planning Overlay and/or the Coastal Zone (Ordinance 188073)
	ZI-2406 Director's Interpretation of Venice Specific Plan and Small Lot Subdivision Ordinance
	ZI-2498 Local Emergency Temporary Regulations - Time Limits and Parking Relief - LAMC 16.02.1
	ZI-2452 Transit Priority Area in the City of Los Angeles

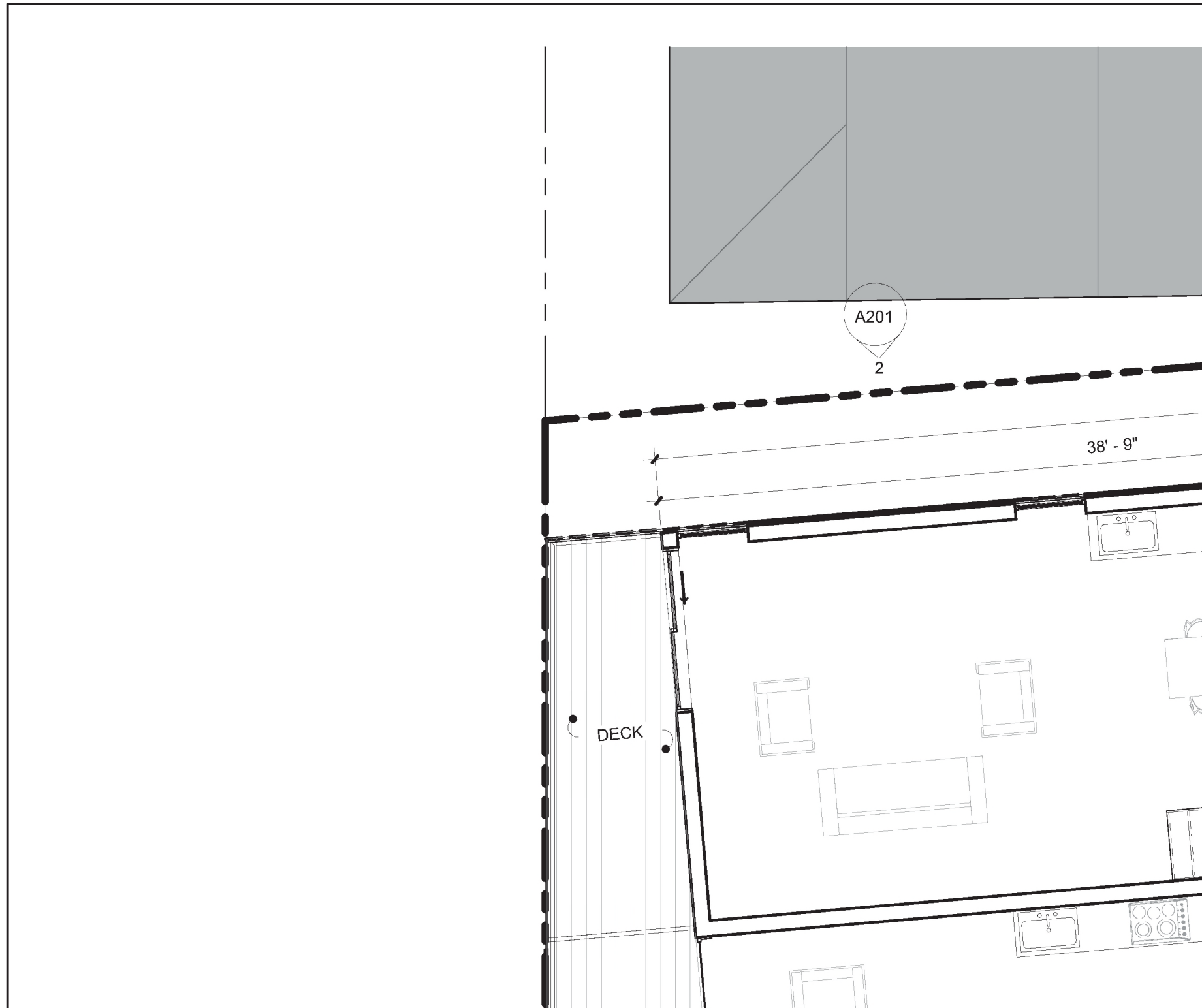

SET LEAD & TAG
PLS 4825 1.00'OUT
FOUND LACE
SPIKE & WASHER
7.13
6.33FL
6.68
SMH
6.83
AC PAVE
CONC
DRIVE
APRON
S 38Ã52'10"E
6.89
6.94TC
AT GRD
7.04
4"MP
(TYP)
4-GM
CONC
4-EM
6.94
6.84
6.82
2.46'W
2.48'W
7.91'S
STREET NAME/
NO PARKING
SIGN
N 51Ã07'18"E
WDW
6.79TC
6.14FL
6.6
4"TREE
10.19
CONC
STEPS
1.27'S
7.10
20.23'
BUILDING LINE ABOVE
CONC
2 STORY
APARTMENT BUILDING
6.88TC
6.38FL
AP
8"TREE
6.8
7.08TC
6.43FL
8"STREETLIGHT
7.34
0.38'S
10.18
CONC
STEPS


(E) STREET TREE
11'
(E) SID
(E) GRADE LVL
(N) GRADE LVL
(E) STREET
TREE LINE
1X SHORT TERM
BIKE PARKING
(COMMERCIAL)


A201
2
5' - 0"
3' EGRESS PATH
FROM PARKING
2' - 0"
8' - 11"
6' - 0"
24" BOX TREE,
MIN. 30" DEEP
PLANTER BOX
3X SHORT TERM
BIKE PARKING
(COMMERCIAL)
SEE SHEET A602:
DETAILS AND
SPECS FOR
SHORT TERM
6' - 0"
29' - 4"
RESTAURANT 1
(SERVICE AREA)
1,276 SF

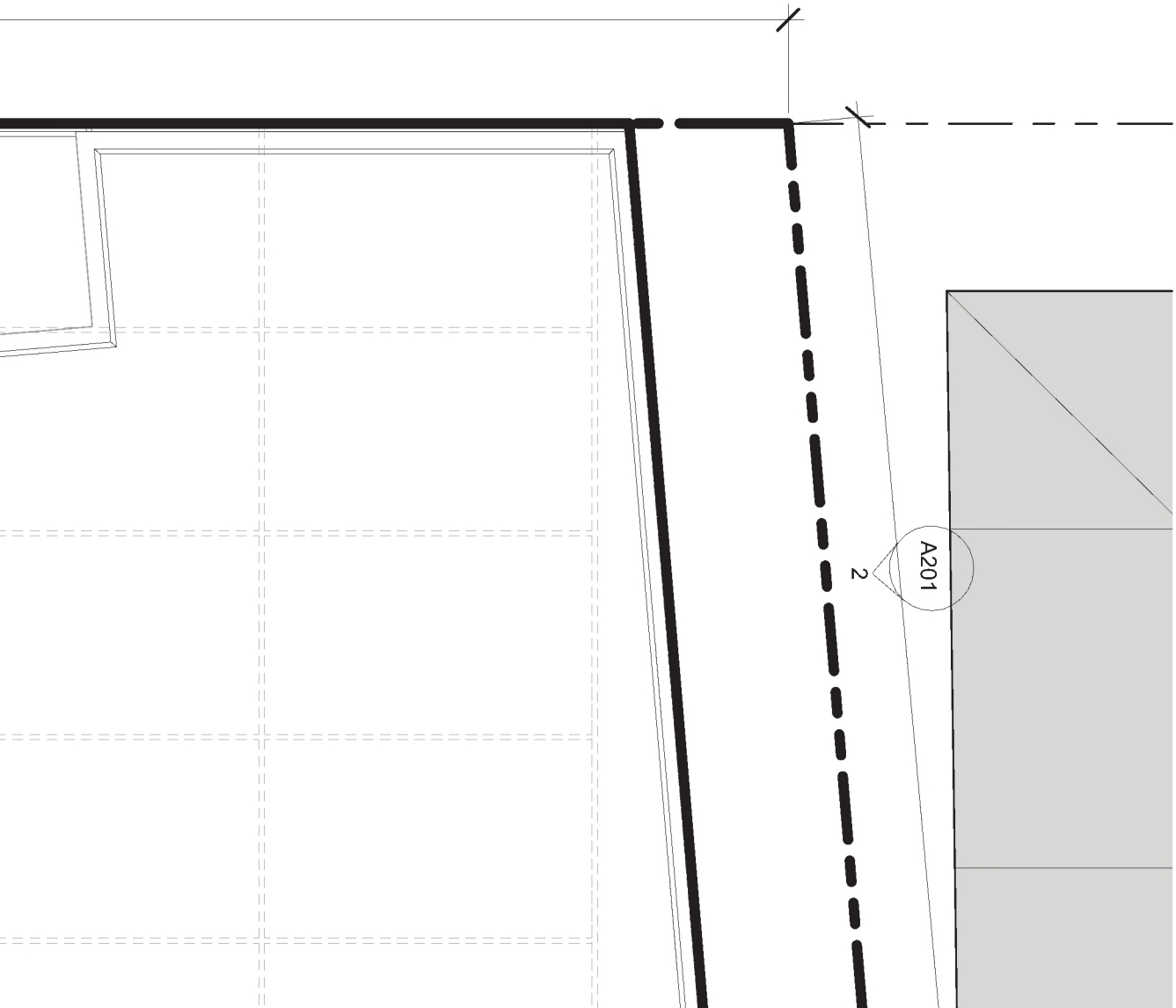

38' - 9"
A201
2
INTERIOR DOOR MANEUVERING CLEARANCE 42" X 32"
18
INTERIOR DOOR MANEUVERING CLEARANCE 42" X 32"
LAVATORY CLEARANCE 30" X 48"
INTERIOR DOOR MANEUVERING CLEARANCE 42" X 32"
17' - 5"
DECK
16' - 8"

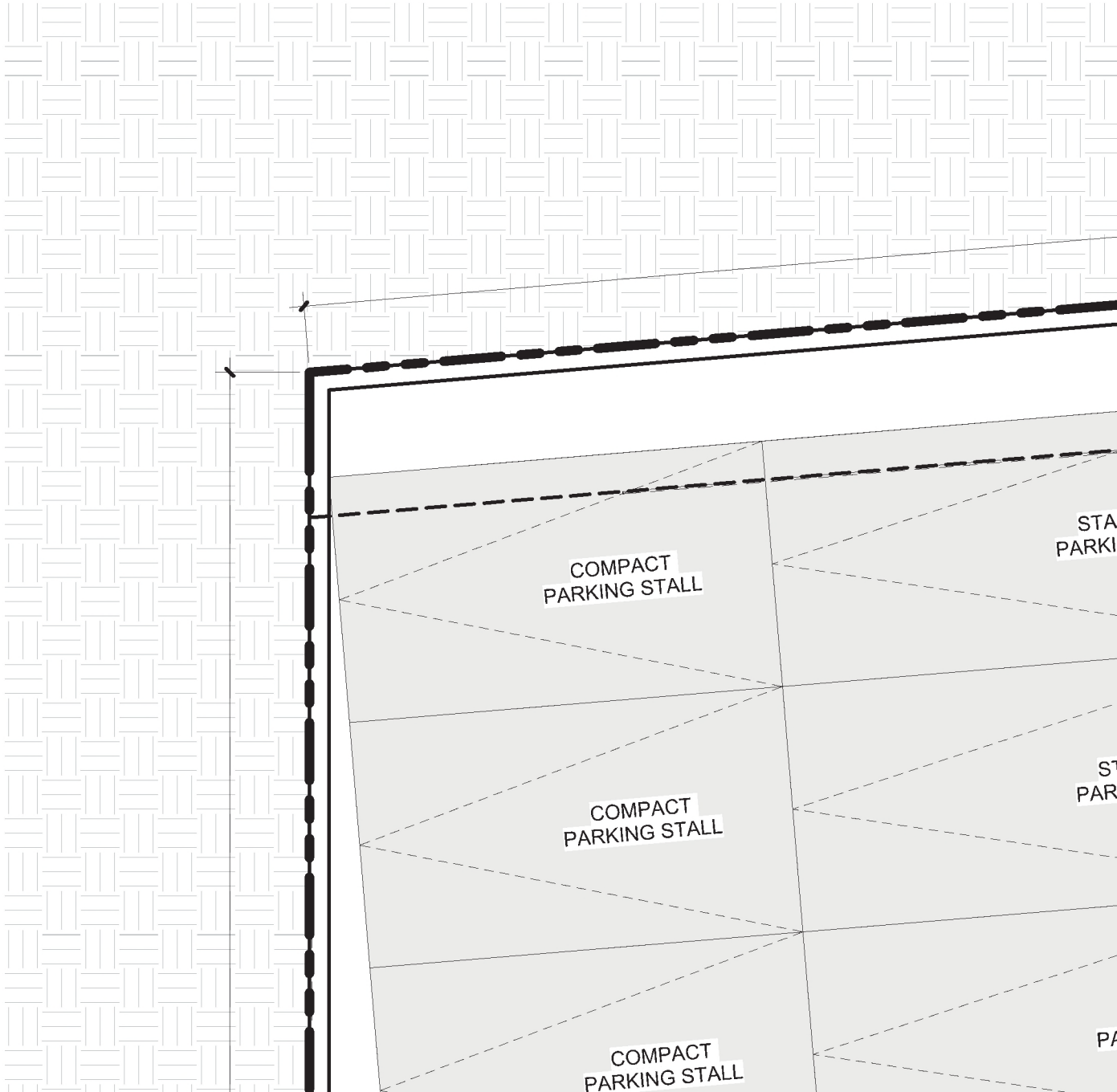

A201
2
38' - 9"
16' - 8"
PROPERTY LINE
DECK
SEEN
BELOW
UP

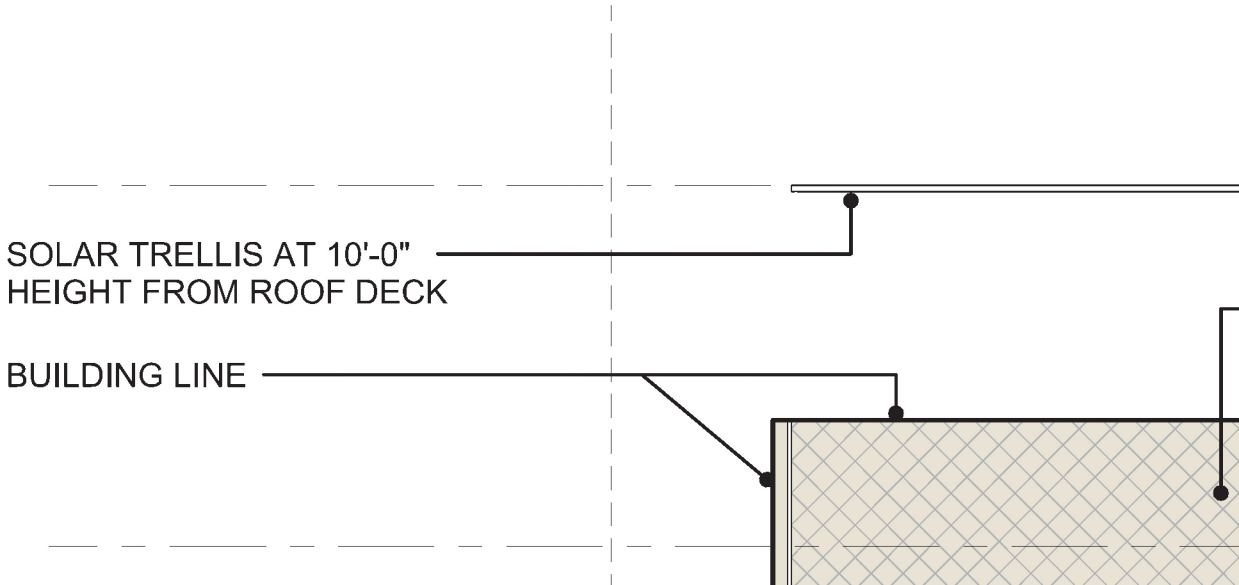

A201
2
38' - 9"
DECK

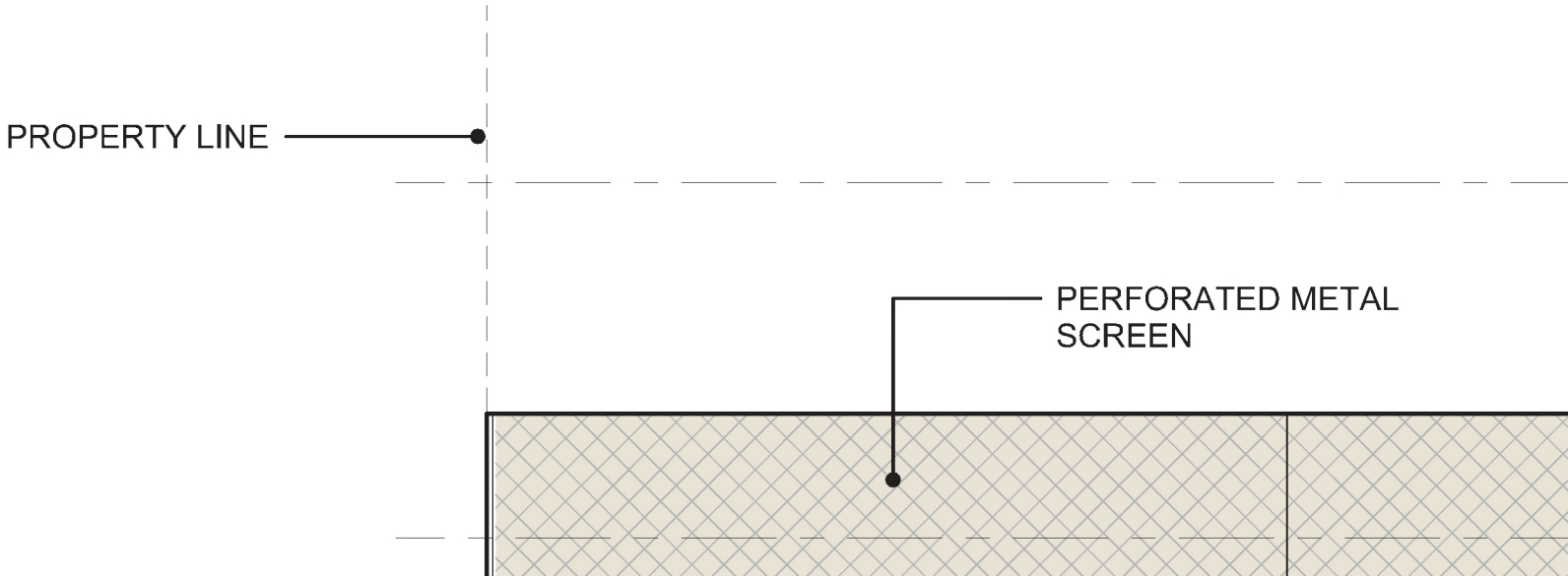
MAIN ST

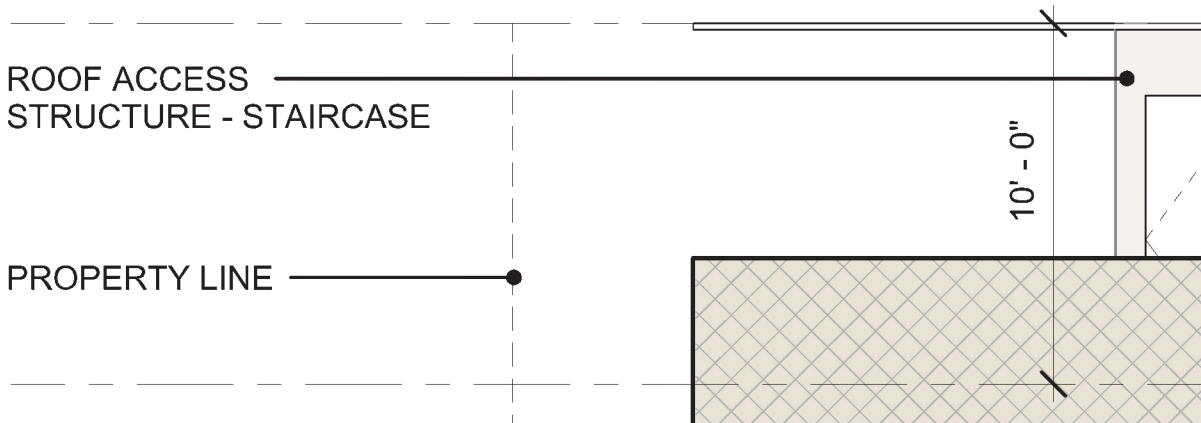
SIDEWALK

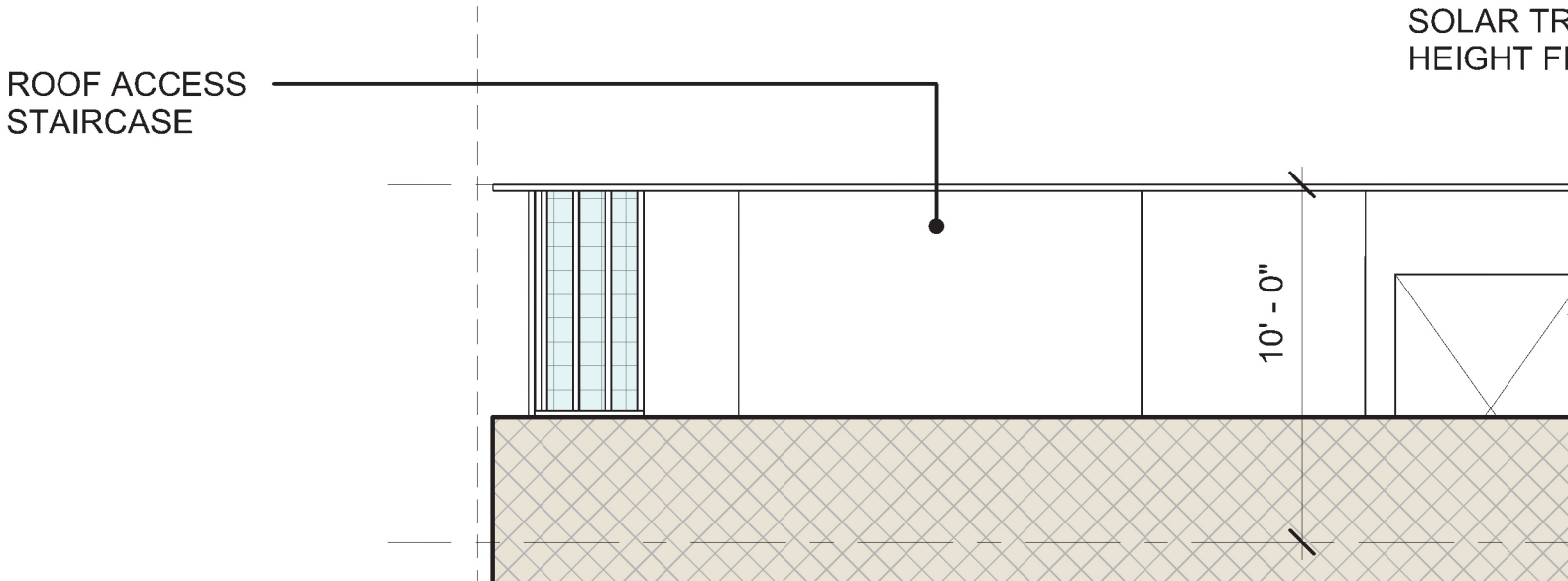


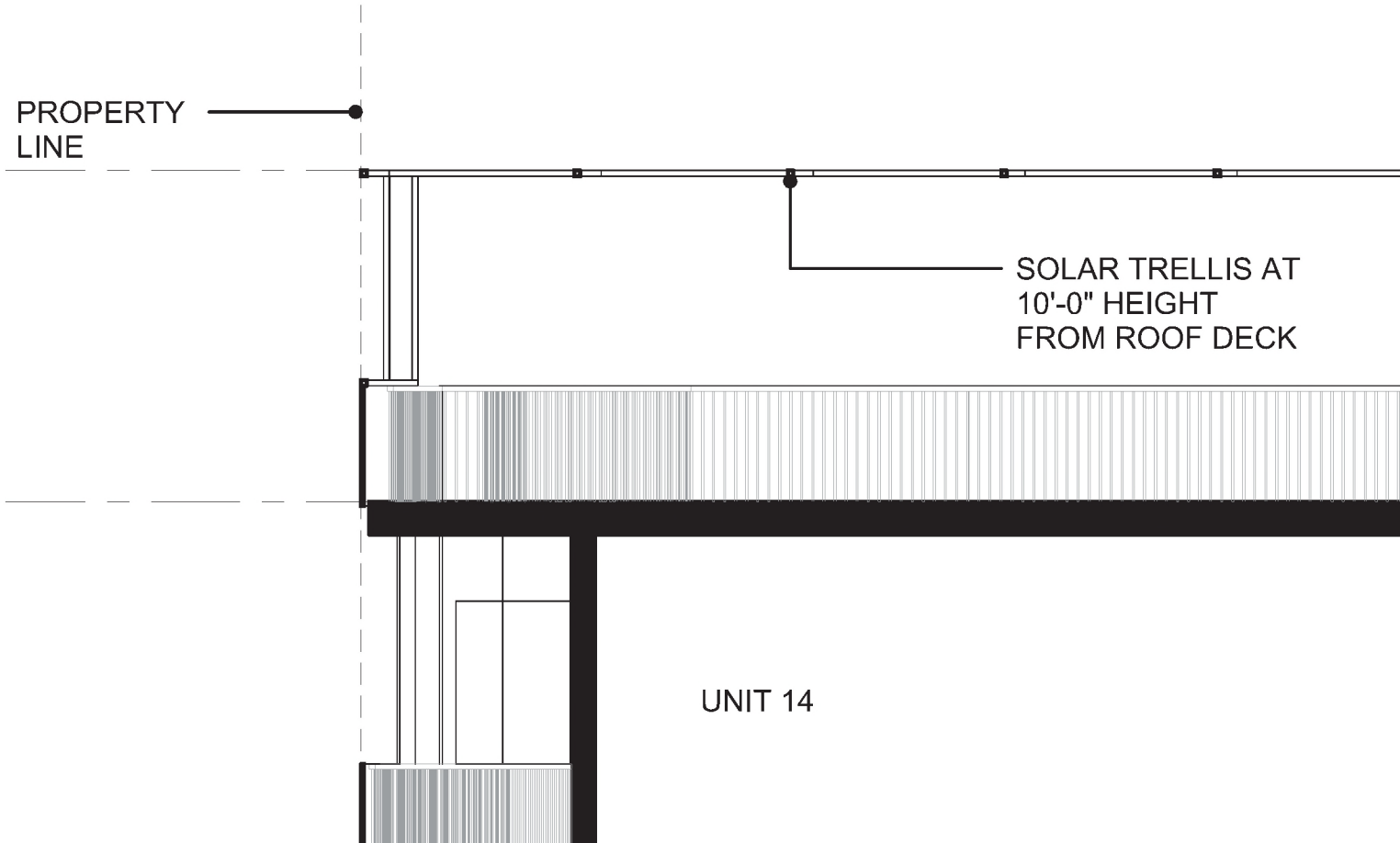

COMPACT
PARKING STALL
COMPACT
PARKING STALL
COMPACT
PARKING STALL

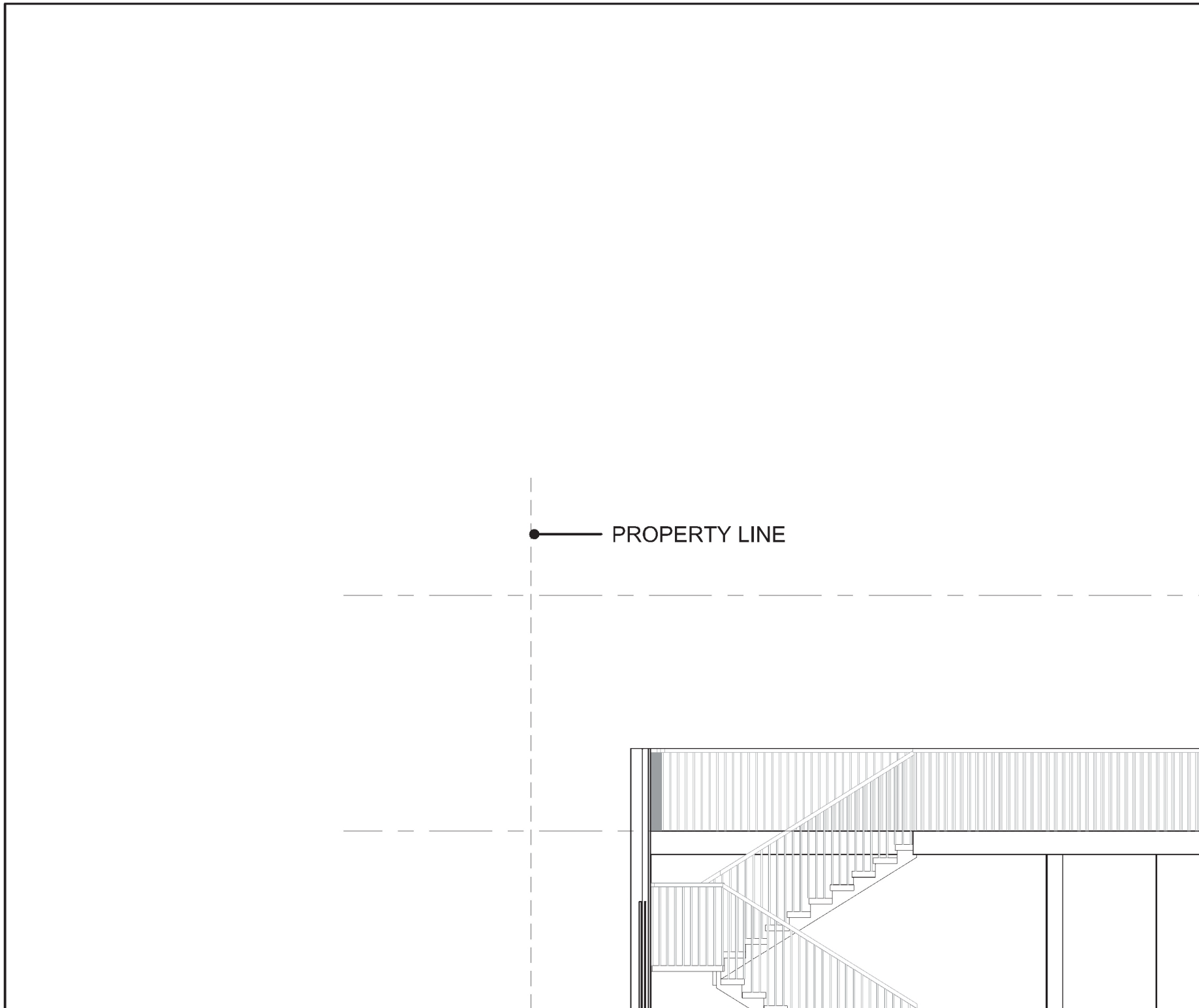

SOLAR TRELLIS AT 10'-0"
HEIGHT FROM ROOF DECK
BUILDING LINE

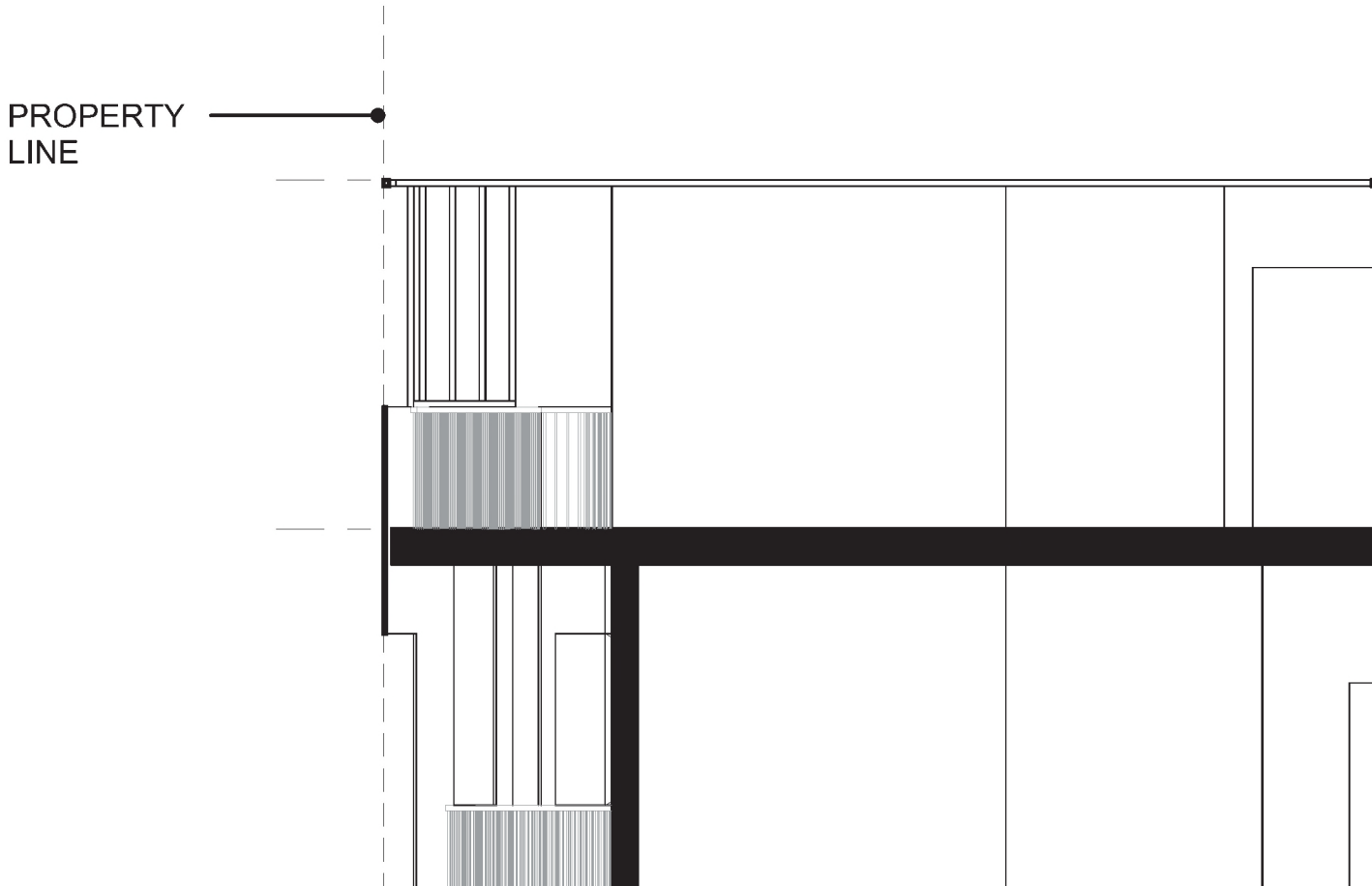

PROPERTY LINE
PERFORATED METAL
SCREEN

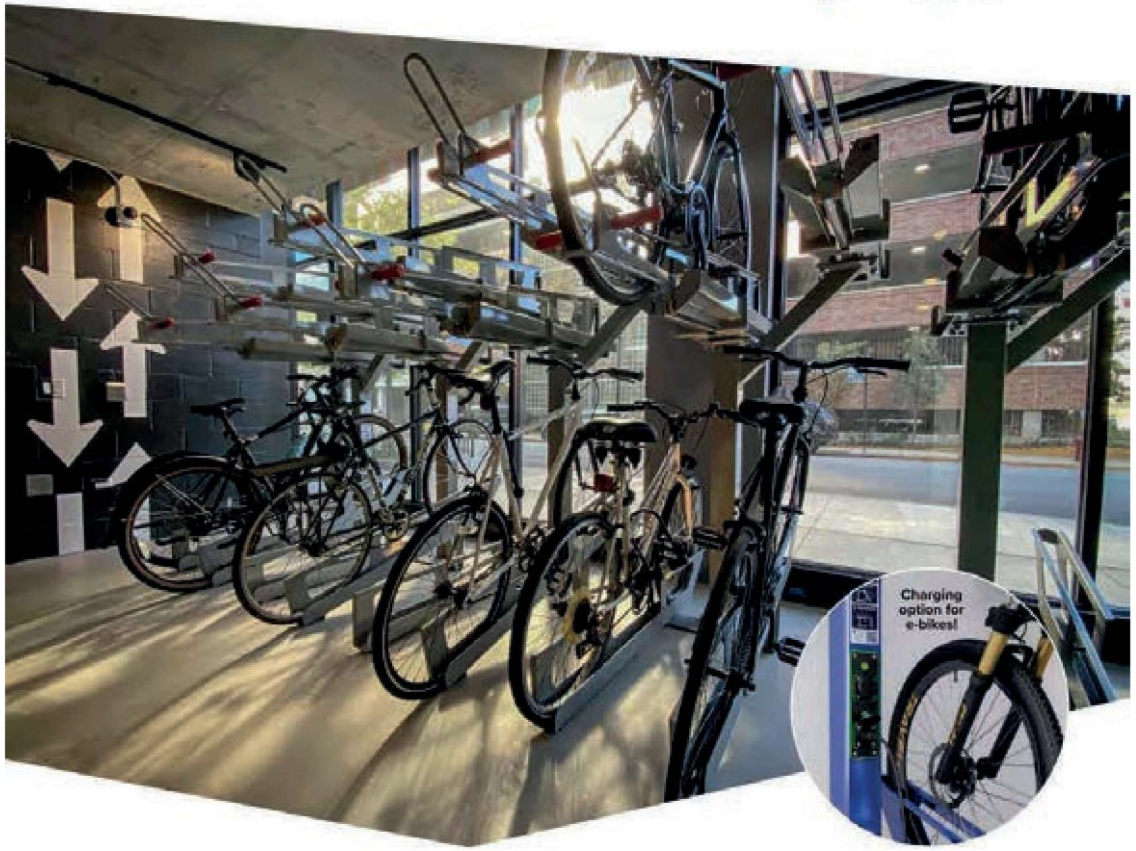

ROOF ACCESS
STRUCTURE - STAIRCASE
PROPERTY LINE
10' - 0"


ROOF ACCESS
STAIRCASE
SOLAR TR
HEIGHT FI
10' - 0"


PROPERTY
LINE
SOLAR TRELLIS AT
10'-0" HEIGHT
FROM ROOF DECK
UNIT 14


PROPERTY LINE


PROPERTY
LINE





Patent #8,936,992

Dero **Decker**

The Dero Decker takes bike parking to the next level. Unlike other two-tier systems our mechanical lift-assist top trays slide down inches from the ground, thus requiring only minimal lifting of the bike into the tray while saving valuable floor space. The Dero Decker has a front wheel safety locking lever and dampers to provide safe lowering of upper trays. Add the e-bike charging option to let users power up their ride while parked.

12/2024

Dero **Decke**





- Sturdy red handle grips
- Lift-assist trays *(weight limit 30lb*
- Dampers for safe lowering o
- Spring loaded levers hold bi firmly in place
- U-lock compatible
- E-bike charging option availa *(lower level only)*

Galvanized



MIXED-USE NEW CONSTRUC
Preliminary Landscape Pla

ADDRESS:	1410-1422 S MAIN ST, VENICE CA 90291
ZONING:	C2-1-O
APN #:	1410 MAIN: 4238012003 1414 MAIN: 4238012004 1422 MAIN: 4238012005
LEGAL DESCRIPTION:	LOTS 3-5, BLOCK 7, VENICE OF AMERICA TRACT
MAP REFERENCE:	M B 6-126/127



OPEN SPACE NOTE & CALCULATION

LAMC 12.21 G.2.(a)(3)
A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway. For a surface area not located directly on finished grade that is used for common open space, and located at ground level or the first habitable room level, shrubs and/or trees shall be contained within permanent planters at least 30-inches in depth, and lawn or ground cover shall be at least 12-inches in depth. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained.

REQUIRED OPEN SPACE:
5XSTUDIO = 1 HABIT. ROOM = 5X100 = 500 SF
5X1 BR = 2 HABIT. ROOMS = 5X100 = 500 SF
9X2 BR = 3 HABIT. ROOMS = 9X125 SF = 1,125 SF

TOTAL REQUIRED OPEN SPACE = **2,125 SF**

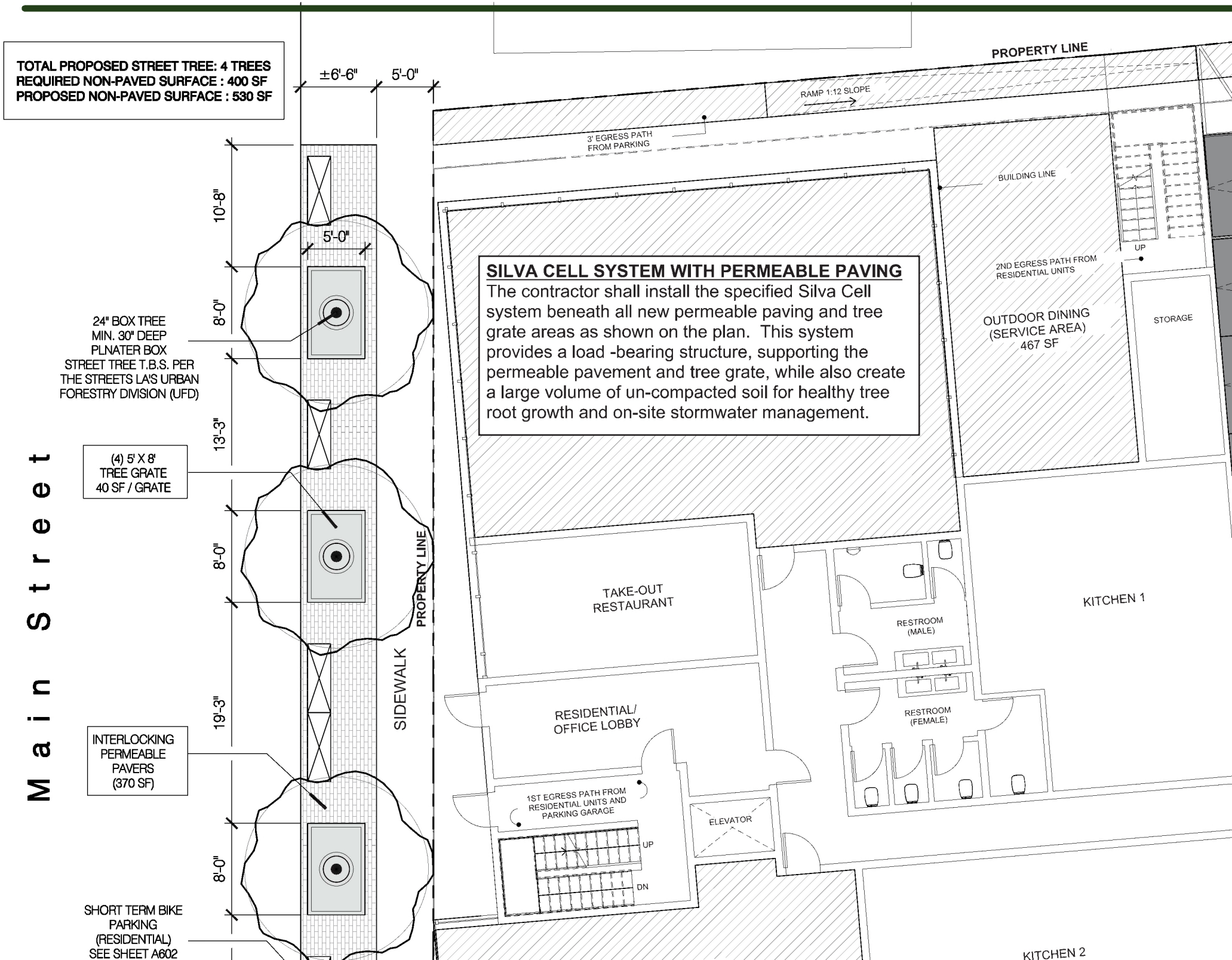
PROVIDED OPEN SPACE:
2,883 SF COMMON OPEN SPACE ON ROOF DECK
(1,106 SF LANDSCAPED)

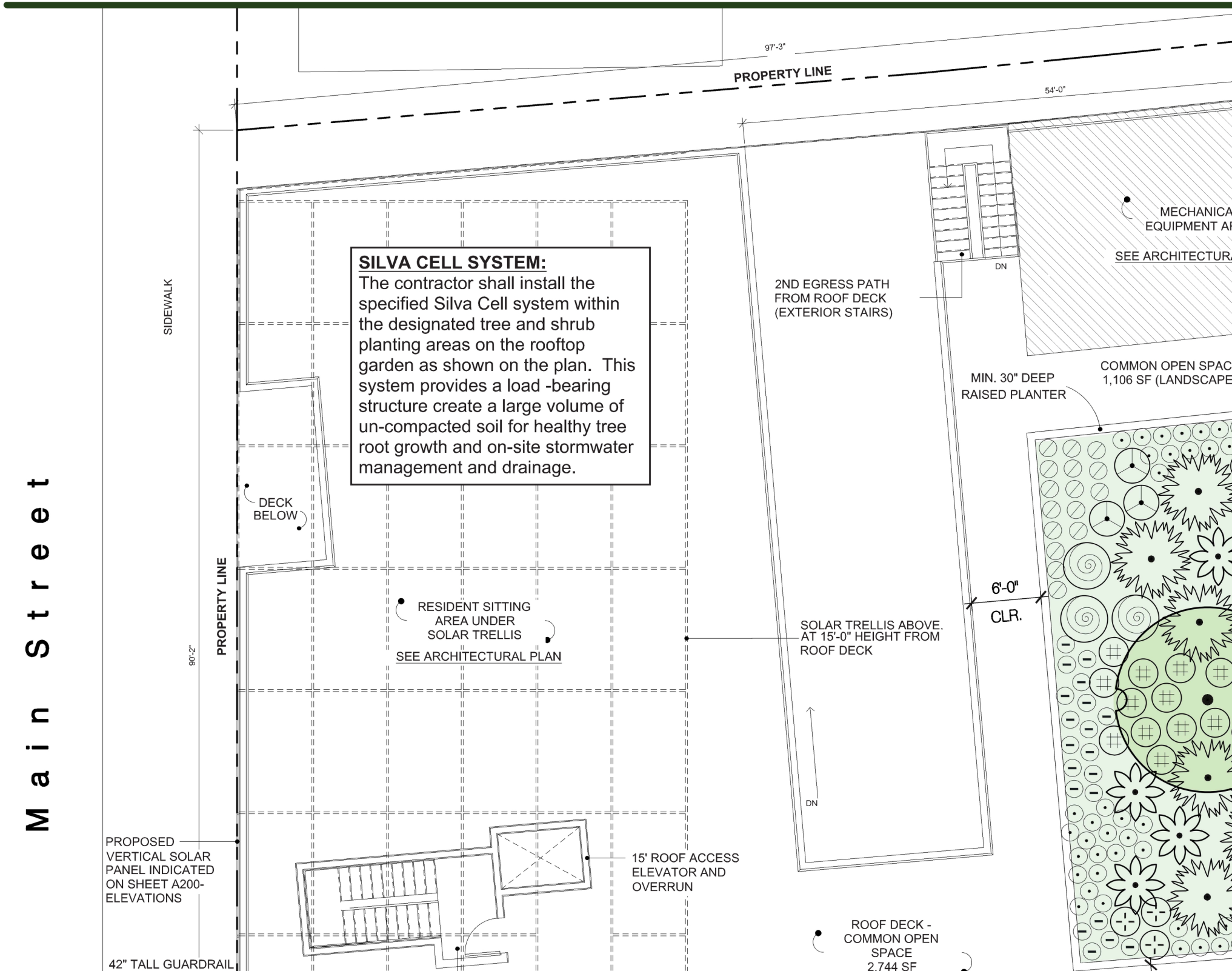
PRO

OWNER:

ARCHITE

LANDSC

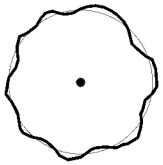
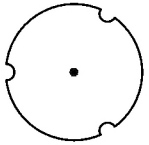

TOTAL PROPOSED STREET TREE: 4 TREES
REQUIRED NON-PAVED SURFACE : 400 SF
PROPOSED NON-PAVED SURFACE : 530 SF
±6'-6"
5'-0"
PROPERTY LINE
RAMP 1:12 SLOPE
3' EGRESS PATH FROM PARKING
BUILDING LINE
10'-8"
5'-0"
8'-0"
24" BOX TREE
MIN. 30" DEEP
PLNATER BOX
STREET TREE T.B.S. PER
THE STREETS LA'S URBAN
FORESTRY DIVISION (UFD)
SILVA CELL SYSTEM WITH PERMEABLE PAVING
The contractor shall install the specified Silva Cell system beneath all new permeable paving and tree grate areas as shown on the plan. This system provides a load -bearing structure, supporting the permeable pavement and tree grate, while also create a large volume of un-compacted soil for healthy tree root growth and on-site stormwater management.
2ND EGRESS PATH FROM RESIDENTIAL UNITS
UP
OUTDOOR DINING
(SERVICE AREA)
467 SF
STORAGE
13'-3"
(4) 5' X 8'
TREE GRATE
40 SF / GRATE
8'-0"
PROPERTY LINE
SIDEWALK
TAKE-OUT
RESTAURANT
RESTROOM
(MALE)
KITCHEN 1
RESTROOM
(FEMALE)
19'-3"
INTERLOCKING
PERMEABLE
PAVERS
(370 SF)
RESIDENTIAL/
OFFICE LOBBY
1ST EGRESS PATH FROM
RESIDENTIAL UNITS AND
PARKING GARAGE
ELEVATOR
UP
DN
8'-0"
SHORT TERM BIKE
PARKING
(RESIDENTIAL)
SEE SHEET A602
KITCHEN 2
Main Street


Main Street
SIDEWALK
PROPERTY LINE
97'-3"
PROPERTY LINE
54'-0"
90'-2"
SILVA CELL SYSTEM:
The contractor shall install the specified Silva Cell system within the designated tree and shrub planting areas on the rooftop garden as shown on the plan. This system provides a load -bearing structure create a large volume of un-compacted soil for healthy tree root growth and on-site stormwater management and drainage.
DECK BELOW
RESIDENT SITTING AREA UNDER SOLAR TRELLIS
SEE ARCHITECTURAL PLAN
2ND EGRESS PATH FROM ROOF DECK (EXTERIOR STAIRS)
DN
MECHANICA
EQUIPMENT AR
SEE ARCHITECTURA
COMMON OPEN SPAC
1,106 SF (LANDSCAPE
MIN. 30" DEEP RAISED PLANTER
6'-0"
CLR.
SOLAR TRELLIS ABOVE. AT 15'-0" HEIGHT FROM ROOF DECK
DN
PROPOSED VERTICAL SOLAR PANEL INDICATED ON SHEET A200-ELEVATIONS
15' ROOF ACCESS ELEVATOR AND OVERRUN
ROOF DECK - COMMON OPEN SPACE 2,744 SF
42" TALL GUARDRAIL

LANDSCAPE DESIGN CONCEPT STATEMENT

THIS PRELIMINARY LANDSCAPE PLAN ENVISIONS A ROOFTOP GARDEN THAT CELEBRATES THE BEAUTY, RE
ECOLOGICAL VALUE OF CALIFORNIA NATIVE PLANTS, SPECIFICALLY THOSE ADAPTED TO THE LOS ANGELE
SHOWCASES A DIVERSE PALETTE OF LOW WATER-USE SPECIES CHOSEN FOR THEIR VARYING TEXTURES, C
INTEREST. BY INTEGRATING PLANTS THAT THRIVE IN THE LOCAL CLIMATE WITH MINIMAL IRRIGATION, THE G
DEMONSTRATES THE AESTHETIC POTENTIAL OF NATIVE FLORA BUT ALSO PROMOTES SUSTAINABLE LANDS
RESULT IS A DYNAMIC, LIVING TAPESTRY THAT INVITES PEOPLE TO EXPERIENCE THE RICHNESS OF CALIFOR
HERITAGE IN AN URBAN SETTING.

PLANTING LEGEND

SYMBOL	SCIENTIFIC NAME & COMMON NAME	SIZE	QUANTITY	City of Los Angeles Native, Y / N	GROWTH	W P
	STREET TREE PER THE STREETS LA'S URBAN FORESTRY DIVISION (UFD)	24 INCH BOX	4	N / A	N / A	
	Cercis occidentalis Western Redbud	24 INCH BOX	1	Y	Height: 12-20 feet Width: 10-15 feet	
	Ephilobium canum California Fuchsia	5 Gallon	6	Y	Height: 3-4 feet Width: 2-3 feet	
	Erigeron glaucus Seaside Daisy	5 Gallon	48	Y	Height: 1-2 feet Width: 1-2 feet	
	Muhlenbergia rigens Deer Grass	5 Gallon	6	Y	Height: 4-5 feet Width: 4-6 feet	
	Achillea millefolium Common Yarrow	1 Gallon	74	Y	Height: <1 foot Width: 1-2 feet	
	Salvia 'Bee's Bliss' Bee's Bliss Sage	5 Gallon	14	Y	Height: 1-2 feet Width: 6-8 feet	
	Penstemon palmeri	5 Gallon	36	Y	Height: 2-3 feet	



Ephilobium canum
California Fuchsia



Muhlenbergia rigens
Deer Grass



Cercis occidentalis
Western Redbud



Penstemon palm
Scented Pensten



Erigeron glaucus
Seaside Daisy



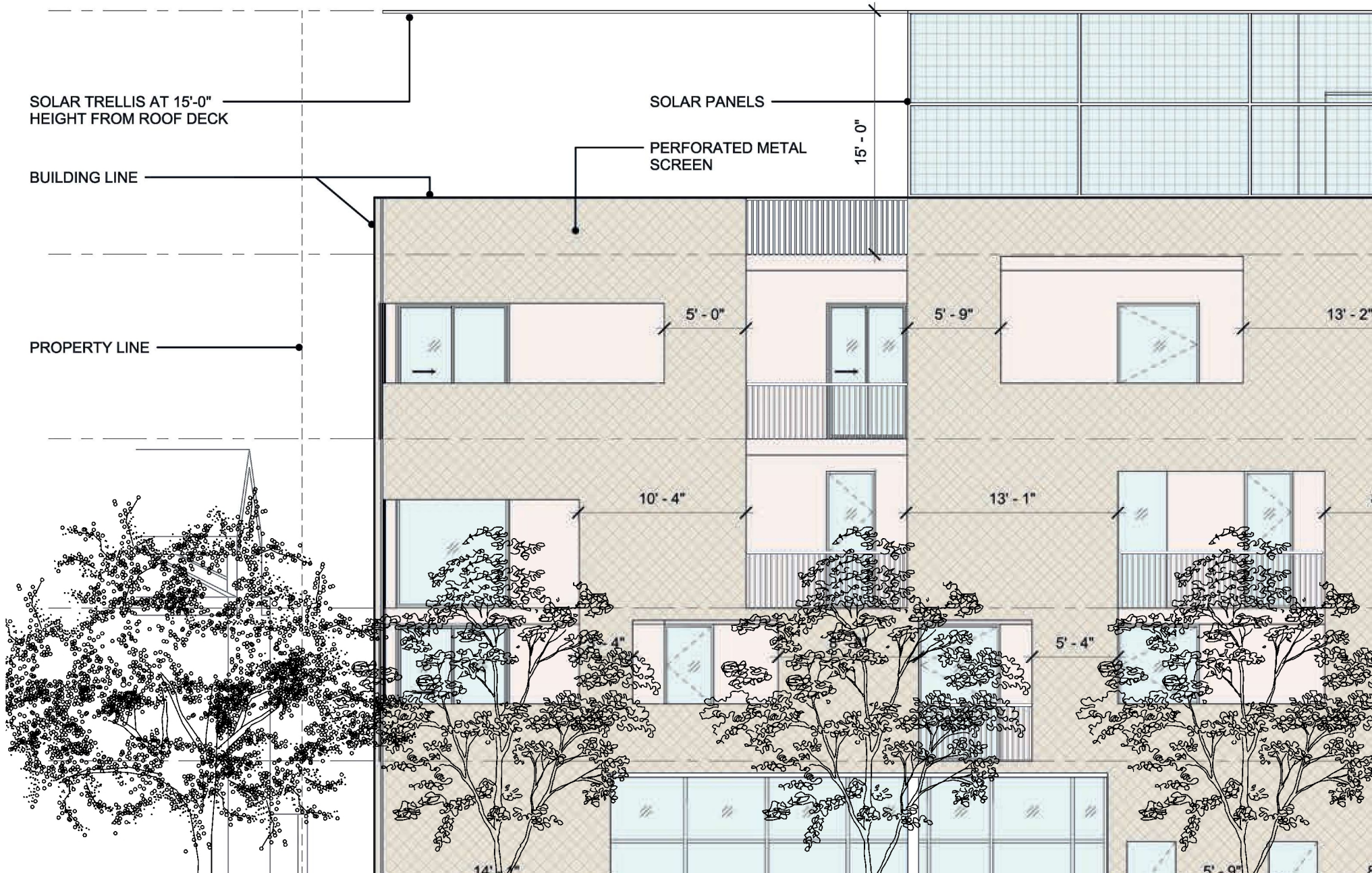
Achillea millefolium
Common Yarrow



Salvia 'Bee's Bliss'
Bee's Bliss Sage



Hesperoyucca w
Our Lord's Canc


SOLAR TRELLIS AT 15'-0"
HEIGHT FROM ROOF DECK
SOLAR PANELS
PERFORATED METAL
SCREEN
15' - 0"
BUILDING LINE
PROPERTY LINE
5' - 0"
5' - 9"
13' - 2"
10' - 4"
13' - 1"
5' - 4"

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit C: Community Character Analysis

1410-1422 S Main Street
Scale, Mass, Character and Visual Impact Analysis
CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

1. Project Summary:

The proposed project at 1410-1422 S Main St involves the development of a 4-story, mixed-use housing development with 19 dwelling units, rooftop deck, commercial space, and a subterranean parking garage with vehicular access from the rear alley. The site is located within the Single Permit Jurisdiction area of the California Coastal Zone and is seeking a Density Bonus entitlement, Coastal Development Permit, and Specific Plan Project Permit Compliance, among other entitlements.

In order to facilitate review of the requested Coastal Development Permit, the following Scale, Mass, Character and Visual Impact Analysis has been prepared to demonstrate the Project's compliance with Chapter 3 of the Coastal Act. Specifically, this report shows, with evidence, that the Project's scale, mass, and character fit within the pattern of development for the area, known as the North Venice subarea within the Venice Coastal Zone Specific Plan, and that the Project will not have a negative visual impact on the community, not on protected public views. Furthermore, this report provides a detailed character analysis supported by historic precedent, zoning regulations, and recent policy direction.

2. Existing Neighborhood Character and Density Bonus Context:

The Venice neighborhood is known for its eclectic mix of historic buildings, artist studios, beachside housing, and mixed-use corridors. Venice has always included buildings of a wide variety of scales and intensities. In fact, many of the community's most iconic structures, including those 4 or more stories in height, were built prior to the 1976 Coastal Act and decades before current zoning limitations were imposed.

Key corridors such as Main Street, Ocean Front Walk, Abbot Kinney Blvd, Venice Blvd, and Rose Ave are home to a variety of multi-story developments, which include residential, commercial, and office uses. Notable examples include Hotel Erwin, Venice Breeze Suites, and the Waldorf Building, each of which is 4 to 5 stories and built prior to modern zoning restrictions.

Historically, Venice was a denser, more urbanized neighborhood, developed to accommodate housing needs and tourist activity in the early 20th century. Many older buildings reflect that density. However, in the late 1980s and early 1990s, large portions of Venice were downzoned under a broader slow-growth policy movement. While the Venice Land Use Plan, certified in 2001, memorializes these restrictions, it fails to reflect the community's historic built character.

Importantly, the proposed Project utilizes California's State Density Bonus law, which provides incentives and waivers for increased development rights, including height and FAR, in exchange for deed-restricted affordable housing. Although the Coastal Act and Density Bonus law operate concurrently, Density Bonus projects in the Coastal Zone have often encountered resistance via misapplication of Coastal Act provisions. These projects are frequently mischaracterized as incompatible with the surrounding neighborhood, when in fact their scale and form reflect the area's established development pattern.

3. Methodology:

Two surveys were conducted:

1. Venice Midrise Precedent Survey – identifying existing 4+ story buildings in Venice, focusing on those built before the 1976 Coastal Act ("Pre-Coastal Act") to establish a historic precedent.

2. Immediate Block Context Survey – documenting height, story count, setbacks, and façade details of properties within and directly adjacent to the project block.

Data sources included LADBS Permit Records, ZIMAS, NavigateLA, and Google Street View and aerial imagery. The identification of buildings as "Pre-Coastal Act" is based on best available construction records and historical data. Some construction dates may be approximate and subject to verification by official building permit archives or historic property records.

A sample of 10 existing buildings was documented, each representing established mid-rise development within the Venice neighborhood.

Midrise Buildings in Venice - Neighborhood Examples Summary Table

Building Name	Address	Stories	Pre-Coastal Act	Current Use
Hotel Erwin	1697 Pacific Ave	5	Yes	Hotel
Venice Breeze Suites	2 Breeze Ave	4	Yes	Hotel
Waldorf Building	5 Westminster Ave	4	Yes	Residential
34 Wavecrest / Pacific	34 Wavecrest Ave	4	Yes	Residential
5 Rose Ave	5 Rose Ave	4	Yes	Residential
51-69 Windward Ave	51-69 Windward Ave	5	Yes	Residential
4 20th Ave	4 20th Ave	4	Yes	Residential
67 E Windward	67 Windward Ave	4	Yes	Residential
45 Venice Blvd	45 N Venice Blvd	4	Yes	Residential
120 Westminster	120 Westminster Ave	4	Yes	Residential

These buildings are concentrated near commercial corridors and beachside residential blocks and form a clear precedent for mid-rise structures in Venice. The existing 4 and 5-story buildings in Venice include a range of styles, from classic revival apartments to contemporary hotels, but share several unifying traits such as articulated facades with recesses and stepbacks, balconies and decorative trim, vertical window arrangements, and roofline variety and massing relief.

The proposed Project similarly incorporates high-quality, modern architectural design with articulated massing, pedestrian-friendly commercial frontage, and stepbacks where appropriate. Its scale is fully consistent with the historic 4- and 5-story buildings listed above and will not obstruct public views or dominate adjacent structures.

Furthermore, the use of underground parking ensures the project will not increase street-level bulk or visual clutter. The rooftop deck is appropriately stepped back at the rear of the building to minimize visibility from adjacent residential vantage points.

Context Buildings Near the Project Site (1410-1422 Main St)

Address	Built	Unit	Height	Stories	Setbacks (F/S/R)	Facade	Roof
EAST SIDE							
1310 Main St	1914	1	~16'	1	10' / 0' / 10'	Flat façade	None
1340 Main St	1948	1	~16'	1	10' / 0' / 10'	Flat façade	None
1402 Main St	1911	1	~16'	1	10' / 0' / 10'	Pitched, recessed entry	None
1410 Main St	1929	1		2	10' / 0' / 10'	Flat façade, recessed entry	None
1414 Main St	1952	2	~30 ft	2	15' / 5' / 15'	Upper stepback, balconies	None
1422 Main St	1921	1	~20 ft	1	20' / 5' / 10'	Front porch, pitched roof	None
1426-1432 Main St	1962	2	*33 ft*	2	*15' / 5' / 15'*	Stepped upper floor, balconies	None
1500 Main St	1965	1	~32 ft	2	15' / 5' / 15'	Balconies, upper stepback	None
WEST SIDE							
1303 Main St	1920	3	~16'	1	15' / 5' / 15'	Minimal articulation	None
1305 Main St	1941	2	~16'	1	15' / 5' / 15'	Flat façade, recessed entry	None
1310 Innes Pl	2009	2	~30'	3	15' / 5' / 15'	Flat façade, entry	Roof Access
1314 Innes Pl	1911	1	~30'	3	15' / 5' / 15'	Flat façade, entry	None
1320 Innes Pl	1910	2	~30'	3	15' / 5' / 15'	Flat façade, entry	Roof Access
1322 Innes Pl	1910	2	1	1	15' / 5' / 15'	Flat façade, entry	None
1324 Innes Pl	1922	n/a	1	1	15' / 5' / 15'	Flat façade, entry	None
1401 Main St	2008	1	~25'	2	15' / 5' / 15'	Flat façade, entry	None
1415-1419 Main St	2008	1	~30'	3	15' / 5' / 15'	Flat façade, entry	None
1501 Main St	1990	n/a	~30'	3	0' / 5' / 15'	Flat façade, parking in rear	None

Average Height: ~21.9 feet
Average Stories: ~1.8

4. Surrounding Context & Visual Impact Analysis

Study Area:

The study area for this analysis consists of Main St between Rose Ave and Horizon Ave, including intersecting alleys and side streets such as Innes Place. This corridor is characterized by a variety of building types and scales, ranging from 1-story neighborhood serving commercial structures to 4- and 5-story residential and hotel developments.

Architectural Character:

The project site is located midblock on the east side of Main Street between Market Street and Horizon Avenue with rear access from an alley. The site currently contains two old single family dwellings and a vacant lot. The surrounding neighborhood exhibits a mix of architectural styles and materials, consistent with Venice's eclectic character. Façade treatments range from flat stucco walls with recessed entries, to upper-story balconies and stepbacks, to pitched roofs and articulated parapets. Many of the older commercial buildings date to the early 1900s through the 1960s, while more recent infill developments feature modern design with larger window openings, mixed materials, and roof decks.

Scale and Massing

Based on the block specific survey above, the average height in the immediate area is approximately 21.9 feet and the average building height is 1.8 stories. While the proposed project will exceed these averages with a 4-story, ~45-foot structure, it is important to recognize that averages do not reflect the full range of existing conditions. In fact, several nearby buildings, including 1310-1320 Innes Place (3 stories), 1501 Main Street (3 stories), and others, already exceed 2 stories.

Additionally, when viewed in the broader Venice neighborhood, the project's height and form align with historic and existing midrise structures along Main Street and nearby commercial corridors in the community.

Compatibility & Transitions

The proposed project has the solar trellis positioned on the roof level along the Main Street frontage to reduce perceived massing from residences and the neighborhood behind the building. The rooftop deck is set back from the parapet to minimize visibility from the public right of way and adjacent properties. The inclusion of active commercial space at the ground floor along Main Street supports pedestrian activity and maintains the pedestrian experience found in the area.

5. Coastal Act Consistency

Section 30251 of the California Coastal Act requires that new development "be visually compatible with the character of surrounding areas" and "restore and enhance visual quality in visually degraded areas."

The Project satisfies these requirements as discussed above:

- Visual Compatibility: The Project's articulated massing, material variety, and ground floor activation mirror design approaches in other nearby Venice developments.

- Historic Precedent: Numerous 4- and 5-story Pre-Coastal Act buildings exist in Venice, including Hotel Erwin, Venice Breeze Suites, and the Waldorf Building. These buildings establish a precedent for midrise construction in the coastal context.

- Restoration of Visual Quality: The Project will replace underutilized, aging structures with a high-quality, mixed-use building that engages the street and improves the pedestrian experience.

- No Protected View Impact: The Project is not located along a designated public view corridor and no scenic coastal vistas will be blocked.

6. Conclusion

The proposed project at 1410-1422 S Main St has been evaluated in terms of scale, mass, character and visual impact within the North Venice subarea of the Venice Coastal Zone Specific Plan.

The block context survey shows that the project will be taller than the average height of 21.9 feet and the average story count of 1.8 stories of nearby buildings. However, this comparison alone does not define compatibility. As documented in the Venice Midride Buildings summary table survey, Venice has a long established pattern of 4- and 5-story buildings, many constructed prior to the 1976 Coastal Act, that contribute to the neighborhood's distinctive, eclectic character. The project is fully aligned with this historic precedent.

Architecturally, the project incorporates articulated massing, stepbacks, and high quality materials that reflect both the commercial and residential forms found along Main Street and adjacent corridors. The ground floor commercial frontage activates the street, while upper floor stepbacks reduce the perceived bulk at the pedestrian level. The rooftop deck is appropriately set back to minimize visibility from sensitive public and private vantage points.

From a policy standpoint, the project appropriately utilizes California's State Density Bonus Law, providing deed-restricted affordable housing in exchange for modest height

and FAR increases, among other incentives/concessions and waivers of development standards to make the project feasible. This is consistent with the State's housing production goals and the Coastal Act's allowance for projects that are "visually compatible with the character of surrounding areas" (California Government Code Section 30251), as well as the policy objective to "restore and enhance visual quality in visually degraded areas."

Given its design sensitivity, alignment with historic midrise precedent, and provision of affordable housing, the proposed project will not cause adverse visual impacts, will respect and reflect the neighborhood's existing architectural diversity, and will enhance the build environment. Therefore, it is concluded that the project complies with Chapter 3 of the Coastal Act and supports the continued vitality and diversity of the Venice community.

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit D: Parking Demand Management Assessment

1410-1422 Main Street

Parking Demand Management Assessment

Brian Silveira & Associates | Venice, CA

Table of Contents

Executive Summary 2

Existing Conditions

- Part 1 - Survey of Local Retail Uses 6
- Part 2 - Parking Rate Survey 7
- Part 3 - Multimodal Transportation Options 10

Project Parking Demand Management

- Parking Required 15
- Parking Demand - Parking Generation 20
- Parking Demand Management 28
  - Residential PDM Strategies 30
  - Commercial PDM Strategies 43

Conclusion 46

Appendices

- Appendix A - On-street Parking Supply Data
- Appendix B - Ridy Shared Micromobility Product and Service Information

Executive Summary

The purpose of this analysis is to help the public - including government agencies, local Project neighbors, and interested community-based organizations - understand the potential parking impacts of the proposed Project along with any parking demand management (PDM) strategies the Project employs.

The Project site is in an urbanized area, and currently encompasses three abutting lots with frontage along Main Street and an alley in the rear. The property is currently improved with two single-family homes, each containing two bedrooms. The lot addressed 1410 Main Street is currently vacant.
The proposed Project includes the demolition of both existing structures and the construction of a new, four-story mixed-use development consisting of nineteen (19) residential dwelling units (including four units covenanted for Very Low Income households) and three commercial restaurant uses. The Project also proposes the provision of twenty-eight (28) total off-street automobile parking spaces - twenty-four (24) for the use of the residential dwelling units and four (4) for the use of the commercial restaurant spaces in lieu of the 118 off-street automobile parking spaces required pursuant to the Venice Coastal Zone Specific Plan (VCZSP).

- The Project's entitlements include a Coastal Development Permit (CDP) for new construction in the single-jurisdiction Coastal Zone, Specific Plan Project Compliance to show compliance with the VCZSP, and a Density Bonus with incentives and waivers to support the financial and physical feasibility of providing nineteen total dwelling units, including four for Very Low Income households.

- The Project site is located in an area where municipalities are prohibited from enforcing a minimum number of required off-street automobile parking spaces under AB 2097 approximately 940 linear feet from Ocean Front Walk, a 'walk street," defined as "A public street in the Venice Coastal Zone that has been improved for public pedestrian use over part of its width and is landscaped (publicly or privately) over the remainder, but which has not been improved for public vehicular access…"

- The Project's proposed uses are: three commercial restaurant spaces as well as 19 multi-family residential dwelling units, including 4 units reserved for Very Low Income households.

- The Project's proposed commercial restaurant uses are designed for community- and visitor-facing patronage.

This study was completed by Brian Silveira & Associates to examine the anticipated impacts of the Project on the area's on-street parking resources. The study examined parking utilization rates of nearby parking lots and on-street parking facilities during peak hours, the automobile parking practices of nearby commercial operators, and the availability of existing and planned alternatives to car ownership. The study found that:

- There is adequate parking supply in publicly- and privately-owned parking lots and on the street surrounding the project during typical weekday and weekend evenings.

- Restaurants near the proposed development in the Main Street Area don't generally provide parking for their customers.

- Existing and planned infrastructure support resident and visitor alternatives to automobile transportation.

Below, the report discusses some of the relevant limitations in identifying the effectiveness of parking demand management strategies.

Limitations

Although they often overlap, most technical studies focus on Vehicle Miles Traveled (VMT) reductions which don't translate neatly into parking demand reductions.

A review of Transportation Demand Management (TDM) literature reveals that most of the studies of the effectiveness of various separate and combined TDM strategies deliver the results in the form of VMT reductions, not parking demand reduction. A TDM measure seeks to manage the demand for travel by drive alone private car (SOV), rather than catering to that demand, or managing the road system on which vehicles travel. TDM measures are aimed at influencing mode choice, trip length, the frequency of trips and the route taken. They originated from commuter-based programs aimed at shifting commuters from drive alone travel choices to other modes, including carpooling and vanpooling and can be applied to meeting specific goals, namely, to reduce congestion, to improve air quality or to reduce the reliance on energy (FHWA, 2012). In general, TDM has been associated with addressing congestion as a result of commuting.
By contrast, PDM measures - particularly those associated with residential development, seek to decrease SOV ownership by implementing effective transportation alternatives. The discussion section included in the analysis of each PDM strategy adds context to the anticipated parking impacts by reviewing relevant research and extrapolating from them for the proposed Project.

Most studies analyze PDM policies at the city-wide or regional levels.

Very little analysis of the effectiveness of PDM strategies at the project level has been published. This is likely due to the fact that many PDM strategies are considered and/or implemented by local governments as opposed to individual residential, commercial, or industrial project developers. Project developers are often beholden to the parking policies in effect at the time that entitlements or building permits are sought for their individual projects and, therefore, the formulation and study of PDM strategies is driven by municipal, regional, and state-based governance bodies. This, of course, does not imply that PDM strategies are ineffective at the project-level but that, for the purposes of this report, their effectiveness has to be translated from what is known about their functionality at a larger scale to what the report infers about their functionality at the project scale.

Managing parking demand (as opposed to simply reducing trip generation) by limiting or eliminating the automobile parking spaces available to residential developments is a re-emergent technique in the 21st century.

Uniquely, residential areas are the points where SOVs are parked for the longest duration and where owners of said SOVs will leave their vehicles should other TDM strategies (e.g., enhanced public transportation) prove effective (Khaliq, 2015). Since the invention and wide adoption of SOVs as Americans' primary form of transportation, policies seeking to limit vehicle ownership have not been tested in the public or private sphere. Therefore, best practices for strategies to limit vehicles associated with private, leased residential units are largely still unknown and, at the very least, have not been published in any widely distributed periodical.

Where limiting or eliminating off-street parking tied to a specific residential location is studied, it is usually in the context of homeownership and perceptions of perceived home value and not as a variable in the selection of a rental unit (e.g., Stubbs, 2002). In general, residential parking policy suffers from the biggest dearth of research evidence (Marsden, 2006). What's more, even less evidence exists to support or negate the effectiveness of integrating supporting amenities such as ample bicycle parking, innovative delivery systems, and targeted marketing on the elasticity of SOV ownership.

Existing Conditions

The Project site comprises three adjacent trapezoidal lots, zoned C2-1-O, with 90 feet of frontage along South Main Street, currently improved with two one-story single-family dwellings and one garage. To the north are two apartment buildings – one three-story building with six units, and one two-story building with four units, also zoned C2-1-O. To the south is a two-story mixed-use building with two dwelling units and office space, also zoned C2-1-O. Across the alley to the east are two two-story apartment buildings, each containing four units and zoned RD1.5-1-O.

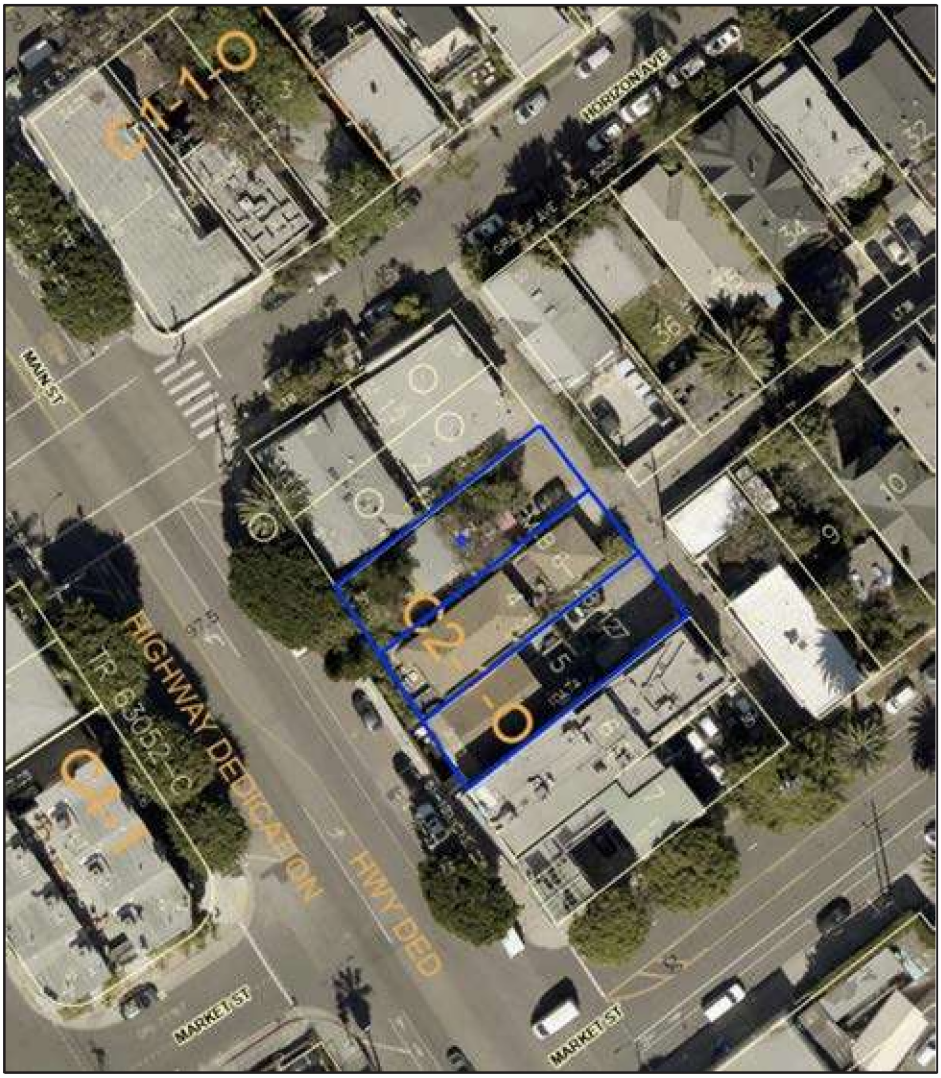


Figure 1 - Project site for the proposed mixed-use development

The Project sites are located within the planning boundaries of the Venice Community Plan of the City of Los Angeles adopted in September 2000. The sites are zoned C2-1-O and have a General Plan land use designation of Neighborhood Commercial in Height District 1. The Project site is also located within the Los Angeles Coastal Transportation Corridor Specific Plan, the North Venice subarea of the Venice Coastal Zone Specific Plan (and is included in the Beach Impact Zone).

This area is identified in the certified Venice Land Use Plan (LUP) as Neighborhood Commercial. According to Policy I.B.5 of the LUP, Neighborhood Commercial areas in the Venice Land Use Plan are intended to serve nearby residents with small-scale, pedestrian-oriented businesses and community services that support daily convenience and minimize vehicle trips. This project, which includes three restaurants and 19 residential units in a mid-rise, mixed-use format, is consistent with the Plan's vision by providing community-facing amenities and housing that encourage walking and reinforce the neighborhood's active, human-scaled character.



Figure 2 – Current photograph of the structures at 1410-1422 S Main Street

Part 1: Survey of Local Retail Uses

In addition to its residential uses, the proposed development includes three different sit-down restaurant spaces as well as a take-out window to serve one or more of the proposed onsite operators. In order to determine parking provided by similar establishments in the area, the consultant team visited several restaurants in the immediate vicinity of the proposed development. Upon entering the establishments, the consultants asked staff if there were off-street parking spaces dedicated to their customers. In all cases, the staff members responded that there were no off-street parking spaces dedicated to the establishments' retail customers. Several staff members at various retailers mentioned that although the business did not provide parking for the exclusive use of their customers, there were private and public parking lots that provide off-street parking at an hourly rate. A characterization of the types of retail establishments surveyed can be found below in Table 1. It is important to note that, like the subject property, all of the existing establishments included in the survey have commercial zoning designations.

Name	Address	Proximity to Site	Establishment	Hours of Operation	Customer Parking?
N/A (Proposed)	1410-1422 Main St	Subject Site	Restaurant	**TBD**	Yes, 4 spaces
Hama Sushi	213 Windward Ave	420 Feet	Restaurant	5:00pm - 9:30pm	No
Mao's Kitchen	1512 Pacific Ave	450 Feet	Cafe/Restaurant	12:30am - 10pm	No
Great White	1604 Pacific Ave	530 Feet	Restaurant	8:00am - 11:00pm	No
Market	72 Market St	510 Feet	Restaurant	5:30pm - 1:30am	No
The Butcher's Daughter	1205 Abbot Kinney Blvd	1,060 Feet	Restaurant	8:00am - 10:00pm	No
Gran Blanco	80 Windward Ave	570 Feet	Bar/Restaurant	5:00pm - 1:00am	No
Blue Bottle Coffee	1103 Abbot Kinney Blvd	1,020 Feet	Coffee Shop	6:00am - 6:00pm	No
Eggslut	1611 Pacific Avenue	610 Feet	Restaurant/Cafe	8:00am - 2:00pm	No

Table 1 – Off-street Parking Survey of Existing Restaurants

Beach visitors who drive to the Venice Beach area and its associated recreational and retail establishments typically park in publicly or privately-owned lots that charge an hourly fee. Due to the concentration of tourist-facing retail establishments and popular restaurants and cafes, patrons of businesses near the Windward and Abbot Kinney sections of Venice rarely come for a single business, and instead opt to visit several during the course of their stay. Therefore, it is not typical or practical for individual businesses to provide dedicated parking at the rate prescribed by the Venice Coastal Zone Specific Plan for their customers.

Part 2: Parking Rate Survey

Off-street parking is available in a number of municipally- and privately-owned parking lots within a 10-minute walk of the subject property. The consultant team has compiled a Parking Rate Survey to document the parking rates for eight parking facilities offering parking to the public for a fee. The eight public and private parking lots included in the study represent all of the public-facing lots that were in operation during the peak and off-peak times that members of the consultant team visited the area (early fall of 2024 and early summer 2025). Table 2, below, lists the parking lots surveyed, and Figure 3, shows a map of the lots and their location relative to the Project site.

Entry No.	Address	Distance to Site	Total lot capacity	Special Notes	Fri Eve Ut. Rt.	Wkd Afternoon Ut. Rt
1	1501 Ocean Front Walk	810 Ft	75	valet during peak hours	79%	65%
2	29 Windward Ave	750 Ft	65	valet, stacked	77%	69%
3	1608 S Pacific Ave	500 Ft	10	metered, 1-hr	100%	100%
4	2100 Ocean Front Walk	1,530 Ft	357		28%	83%
5	200 N Venice Blvd	1,510 Ft	196		38%	87%
6	100 Venice Way	630 Ft	30		47%	60%
7	32 17th avenue	740 Ft	50	valet during peak hours	66%	94%
8	121 Windward Ave (Bank of America)	190 Ft	32	valet during peak hours	75%	53%
Average Rate					64%	80%

Table 2 – Average Parking Lot Utilization Rates

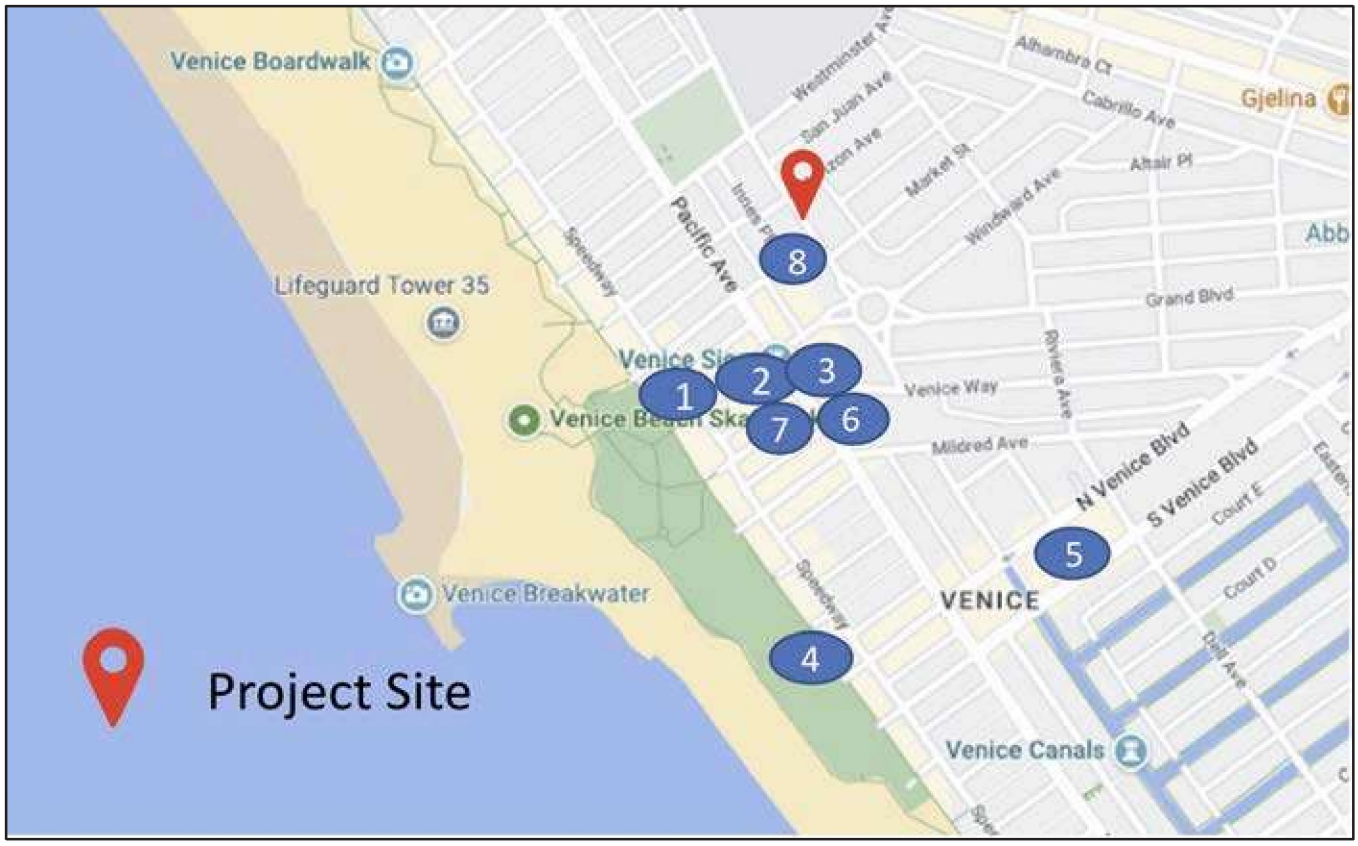


Figure 3 – Map of parking locations surveyed.

Observations of parking rates were completed at two different peak demand periods–Friday evenings, between 7:30pm and 9:00pm, and Saturday afternoons, between noon and 5:00pm. These two time periods reflect both when parking demand for patrons of restaurants and bars and parking demand for beachgoers is highest.

On average, the utilization rate of the surveyed parking lots during weekend evening peak hours was 62%; the utilization rate during weekend afternoon peak hours was 80%. In total, there were 451 unoccupied off-street parking spaces available to visitors on weekend evenings and 164 spaces available on weekend afternoons across the entire study area.

Table 2, above, shows the parking utilization data for all eight lots included in the study. Note that lots that provide valet parking service often have a higher vehicle capacity than can be assumed from the number of demarcated parking stalls as valet parkers may double or triple park vehicles in order to accommodate more cars than could be managed by allowing self-parking.

Based on the observed utilization rates of the surrounding parking facilities available to the public, the consultant team has concluded that there are adequate parking facilities available to absorb the parking needs for the 118 vehicle parking spaces that would otherwise be required by the Venice Coastal Zone Specific Plan for the Project's commercial and residential uses.

The consultant team also took an inventory of the estimated total capacity and observed utilization of on-street parking supply for the area surrounding the project site. Figure 4 below shows a map of the streets surveyed to determine the amount of on-street parking capacity and the amount of on-street parking occupied in relation to the Project site.
Additionally, according to the on-street parking supply survey completed by the consultant team, on weekday and weekend evenings, there is adequate on-street parking supply to support the Project's restaurant uses. The *ITE Parking Generation Manual* considers 85% parking utilization to be fully utilized; at this utilization rate, motorists typically have to drive around the vicinity of their destination several times to find an available parking space. During weekday evenings, the consultant team observed a utilization rate of 70% for unmarked, on-street parking spaces, with approximately 211 spaces available. During weekend evenings, the consultant team observed a utilization rate of 82% for unmarked, on-street parking spaces, with approximately 133 spaces available. In total, the area has the capacity for approximately 745 vehicles in on-street, unmarked parking spaces.[1] The raw data used to calculate the area's total onstreet parking supplies is included in Appendix A.

[1] The consultant team calculated the onstreet parking capacity by measuring the length of the curb frontage (excluding areas where parking is prohibited such as driveway aprons and red curb markings) and divided it by the average length of an onstreet parallel parking space which was found to be 17.7 feet.



Figure 4: Map of On-street Parking Survey Areas

In 2022, the State of California passed Assembly Bill 2097, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on a residential, commercial or other development project located within one-half mile of a major transit stop. The proposed development's proximity to the intersection of Grand Boulevard, Windward Avenue, and Main Street at Windward Circle make this project eligible for the provisions of this legislation.

In addition to automobile parking, the Los Angeles Municipal Code (LAMC) 12.21.A.16(a)(2) requires that general retail buildings provide one long-term and one short-term bicycle parking space for every 2,000 square feet of retail space, with a minimum of 2, and one long-term space for each dwelling unit.

Thus for this project's residential component, 19 long-term spaces are required, and two short-term spaces, and for its commercial component, 3 long-term and 3 short-term spaces are required. The project provides a total of 45 bicycle parking spaces, including 36 long-term and 2 short-term spaces for residential use (excluding additional spaces provided for the Project's dedicated micromobility), and 4 long-term and 3 short-term spaces for commercial use, thereby exceeding the total requirement.

Part 3: Multimodal Transportation Options

The site of the proposed mixed-use development is served by various modes of transportation other than single occupancy vehicles. Infrastructure for pedestrians, bicycles, public transit, public and private rideshare, and electric scooters make car-free and car-lite lifestyles an attractive choice in the Venice area.

Bicycle Infrastructure

The proposed development includes both 40 long term and 5 short term bicycle parking spaces. Studies have shown that having functional and conveniently located long and short-term bicycle parking in a development encourages the use of bicycles as an alternative form of transportation to the automobile. In particular, this is true in a community like Venice, which is relatively flat and which features a broad array of bicycle infrastructure.

The subject property is located approximately 310 linear feet from a Metro Bike Share station at Windward Avenue and Main Street, and 1,280 linear feet from a Metro Bike Share station at Abbot Kinney Boulevard and Santa Clara Avenue. Main Street, directly fronting the subject property, as well as nearby Windward Avenue, Market Street, Grand Boulevard, and Venice Way all feature Tier 2 dedicated bike lanes. Abbot Kinney Boulevard, 1,280 feet from the site, is a "sharrowed" route, meaning that cars must share the road equally with bicycles. At 1,450 linear feet from the project site, Venice Boulevard, which is identified by the Mobility 2035 Plan as a "Comprehensive Transit Enhanced Street," features a Tier 1 protected bicycle lane as part of the City's ongoing effort to enhance its transportation networks. The Marvin Braude Coastal Bike Trail, approximately 1,200 linear feet from the subject property, is a Class 1 bikeway which extends from Will Rogers State Beach in the Pacific Palisades all the way to Torrance Beach in the South Bay.

Public Transit

The area is served by various public transit options as well. On Main Street, 160 feet from the project site, the Santa Monica BBB 18 line, which serves Marina Del Rey, as well as Santa Monica and UCLA, has a stop. Nearby Windward Circle also hosts stops for the Santa Monica BBB 1 Bus Line, which serves Venice, Downtown Santa Monica, Mid City Los Angeles and UCLA, and the LA Metro 33 Line, which serves Downtown Santa Monica, Culver City, and Downtown Los Angeles. Additionally, the Downtown Santa Monica Metro E line station, a 12-minute bike ride from the site, represents High Quality Transit and serves Santa Monica, Culver City, Downtown Los Angeles, and East LA.

SCAG's High Quality Transit Areas

This section of Venice is also identified on a regional planning level by the Southern California Association of Governments (SCAG) as a High Quality Transit Area (HTQA). These are areas that are within one half-mile of major transit stops (sites containing an existing rail or bus rapid transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods) or high-quality transit corridors (corridors with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours).

The purpose of the HQTA designation is to promote Transit-Oriented Development (TOD), reduce congestion and greenhouse gas emissions, and align with broader regional planning goals aimed at creating more livable, equitable, and sustainable communities in Southern California. It allows for coordinated land use and transportation planning efforts to support efficient and accessible transit

options for residents and commuters. Figure 1 below shows the Project's location within the bounds of the HQTA in beige.



Figure 5: High Quality Transit Areas
Source: High Quality Transit Areas (HQTA) 2016 – SCAG Region

App-Based Rideshare

App-based ridesharing services can reduce the demand for automobile ownership by providing convenient transportation options without the hassle of ownership, such as parking, maintenance, and insurance. Users can request a ride whenever they need one, eliminating the need to own a car for occasional or specific trips. For many people, using ridesharing services can be more cost-effective than owning a car. Additionally ridesharing offers flexibility in terms of vehicle type and size, catering to a wide range of transportation needs without the commitment of owning a specific type of vehicle.

Services such as Lyft and Uber have become ubiquitous in most cities in the United States, and the Venice area of Los Angeles is a prime example of where such services can facilitate a life free of automobile ownership. Additionally, within the Venice area, LADOT operates LAnow, its own on-demand rideshare app.

Active Commuting

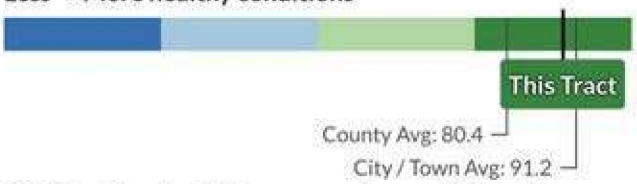
Additional evidence of the availability and feasibility of non-single-occupancy vehicle transportation is captured in a profile of the relevant census tract on the Healthy Places Index (HPI) which uses data from the American Community Survey to tabulate the health of California's census tracts relative to the state, county, and city as a whole. As shown in the figure below, the HPI rates the Census Tract 2735.02 highly (the 89th percentile for California tracts) for a characteristic it calls "Active Commuting" citing that 19.1% of the Census Tract's workers (16 years and older) commute to work by transit, walking, or cycling. This is compared to 8.99% who do so on a statewide level, 9.65% who do so on a countywide level, and 14% who do so on a citywide level.

Figure 6: Healthy Places Index: Active Commuting, Census Tract 2733

Active Commuting: 89.0 percentile

Value: **19.1%**

Less → More healthy conditions



This Tract has healthier community conditions than 89.0% of other California Tracts.

Tract 2735.02

County > City / Town > Tract
Los Angeles > Los Angeles > 2735.02

Population: 2,861

	Active Commuting	Percentile
State	8.99%	N/A
County	9.65%	80.4
City / Town	14.0%	91.2
Tract	19.1%	89.0

Project Parking Demand Management

Base Parking Demand

The proposed development at 1410-1422 Main Street consists of three new commercial restaurant units as well as nineteen residential dwelling units, including four reserved for Very Low Income households. The three new commercial restaurant units will contain the following service floor areas (SFA) and gross floor areas (GFA):

- Restaurant 1 will contain 1,276 square feet of SFA and 1,873 square feet of GFA
- Restaurant 2 will contain 527 square feet of SFA and 1,237 square feet of GFA
- Restaurant 3 will contain 1,082 square feet of SFA (including a 434 square foot bar on the roof deck) and 1,204 square feet of GFA
- Restaurants 1 and 2 will share a 467 square foot outdoor dining area
- A 292 square foot take-out food and beverage space is provided on the ground floor for the use of the onsite restaurant operators (take-out space is not considered to constitute service floor area under the Venice Coastal Zone Specific Plan [VCZSP])
- The Project proposes a total of 3,352 square feet of service floor area and 5,073 square feet of GFA

Because the Project site is located within the Beach Impact Zone (BIZ) of the Venice Coastal Zone Specific Plan area, additional parking is required beyond that mandated by the regular LA parking code (contained in LAMC 12.21. A.4.) and the Venice Coastal Zone Specific Plan at a rate of one automobile parking space for every 640 square feet of service floor area, including outdoor dining areas. The table below shows the number of parking spaces required by the Venice Coastal Zone Specific Plan, the Los Angeles Municipal Code (LAMC) standard parking code (12.21. A.4.), and Assembly Bill 2097 (AB 2097 [Friedman, 2022]) for each of the Projects' proposed uses.

Table 3: Parking Quantities Required by Different Policies

Policy Document	Relevant Use	Number of Spaces Req'd (per code)	Project's Amount of Use	Total Number Req'd per Use
VCZSP[1]	**Relevant Project Uses**			
	Restaurants	**1/50 sq ft SFA + 1/640 sq ft SFA (BIZ[2])**		
	Residential Dwelling Units	**2.25 per dwelling unit**		
	Restaurant 1 (Ground Floor)	**1/50 sq ft SFA + 1/640 sq ft SFA**	1,276 sq ft SFA/ 50 + 1,276 sq ft SFA /	28 spaces

		(BIZ[1])	640	
	Restaurant 2 (Ground Floor)	**1/50 sq ft SFA + 1/640 sq ft SFA (BIZ[1])**	527 sq ft SFA / 50 + 527 sq ft SFA / 640	12 spaces
	Shared Outdoor Dining Area (Ground Floor)	**1/50 sq ft SFA + 1/640 sq ft SFA (BIZ[1])**	467 sq ft SFA / 50 + 467 sq ft SFA / 640	11 spaces
	Restaurant 3 (Upper Floor)	**1/50 sq ft SFA + 1/640 sq ft SFA (BIZ[1])**	1,082 sq ft SFA / 50 + 1,082 sq ft SFA / 640	24 spaces
	Residential Dwelling Units	**2.25/unit**	19 units x 2.25	43 spaces
Total Spaces Required by VCZSP[1]	**118 vehicle parking spaces**			
LAMC 12.21. A.4.	**Relevant Project Uses**			
	Restaurants and Bar, General (over 1,000 sq ft GFA)	**1/100 sq ft GFA**		
	Retail Store, General (Take-out Space)	**1/292 sq ft GFA**		
	Residential Dwelling Units	**1 space per studio or 1-bedroom unit 1.5 spaces per two-bedroom unit**		
	Restaurant 1 (Ground Floor)	**1/100 sq ft GFA**	1,873 sq ft SFA/ 100	19 spaces
	Restaurant 2 (Ground Floor)	**1/100 sq ft GFA**	1,237 sq ft SFA / 100	13 spaces

	Shared Outdoor Dining Area (Ground Floor)	**1/100 sq ft GFA**	467 sq ft SFA / 100	5 spaces
	Restaurant 3 (Upper Floor)	**1/100 sq ft**	1,204 sq ft GFA / 50	13 spaces
	Studio and 1-bedroom Residential Dwelling Units	**1/unit**	11 units x 1	11 spaces
	2-bedroom Residential Dwelling Units	**1.5/unit**	8 units x 1.5	12 spaces
	Bicycle Parking Ordinance[3]	**-30% residential parking reduction**	23 x 0.3	-6 spaces
Total Spaces Required by LAMC 12.21. A.4.	**67 vehicle parking spaces**			
LAMC 9.2.1.C.2.b. (Density Bonus)	**Relevant Project Uses**			
	Restaurants and Bar, General (over 1,000 sq ft GFA)	**1/100 sq ft GFA**		
	Retail Store, General (Take-out Space)	**1/292 sq ft GFA**		
	Residential Dwelling Units	**1 space per studio or 1-bedroom unit 1.5 spaces per two-bedroom unit**		
	Restaurant 1 (Ground Floor)	**1/100 sq ft GFA**	1,873 sq ft SFA/ 100	19 spaces

	Restaurant 2 (Ground Floor)	**1/100 sq ft GFA**	1,237 sq ft SFA / 100	13 spaces
	Shared Outdoor Dining Area (Ground Floor)	**1/100 sq ft GFA**	467 sq ft SFA / 100	5 spaces
	Restaurant 3 (Upper Floor)	**1/100 sq ft**	1,204 sq ft GFA / 50	13 spaces
	Studio and 1-bedroom Residential Dwelling Units	**1/unit**	11 units x 1	11 spaces
	2-bedroom Residential Dwelling Units	**1.5/unit**	8 units x 1.5	12 spaces
	Bicycle Parking Ordinance[3]	**-15% residential parking reduction**	23 x 0.15	-3 spaces
Total Spaces Required by 9.2.1.C.2.b.	**70 vehicle parking spaces**			
AB 2097	**Relevant Project Uses**			
	Restaurants and Bar, General (over 1,000 sq ft GFA)	**0 spaces**		
	Retail Store, General (Take-out Space)	**0 spaces**		
	Residential Dwelling Units	**0 spaces**		

	Restaurant 1 (Ground Floor)	**0 spaces**
	Restaurant 2 (Ground Floor)	**0 spaces**
	Shared Outdoor Dining Area (Ground Floor)	**0 spaces**
	Restaurant 3 (Upper Floor)	**0 spaces**
	Studio and 1-bedroom Residential Dwelling Units	**0 spaces**
	2-bedroom Residential Dwelling Units	**0 spaces**
Total Spaces Required by AB 2097	**0 vehicle parking spaces**	

1. Venice Coastal Zone Specific Plan
2. Additional parking required in the Beach Impact Zone under the VCZSP
3. Under LAMC 12.21. A.4., up to 30% of the required automobile parking spaces for residential and nonresidential uses may be replaced by bicycle parking at a rate of one automobile space per four bicycle spaces when the project site is within 1,500 feet of a major transit stop, as defined in Subdivision (b) of Section 21155 of the California Public Resources Code; up to 10% of residential parking may be replaced in conjunction with parking residential parking rates established by the City's Density Bonus code (9.2.1.C.2.b.); Projects in the Coastal Zone are not eligible to replace automobile parking required under the VCZSP

It should be noted that minimum parking requirements are not informed by standardized analyses of the parking demand generated by particular land uses and contexts, rather they are traditionally intended to create an *oversupply* of parking spaces devoted to SOVs in lieu of managing a more efficient parking supply (Shoup, 2005; Marsden, 2006; Litman, 2005).

Parking Generation

In order to establish the expected base parking demand for the subject Project, the consultant team used data from the *Institute of Transportation Engineers Parking Generation Manual 5th Edition*. The *Parking Generation Manual* includes a complete set of searchable electronic files including land use descriptions and data plots for all available combinations of land uses, time periods, independent variables, and settings. The information is based on parking generation studies submitted voluntarily to ITE by public agencies, developers, consulting firms, student chapters, and associations. The *Parking Generation Manual* provides access for users to the ITEParkGen web app. This desktop application allows electronic access to the entire parking generation dataset with numerous filtering capabilities including site setting (i.e., rural, general urban/suburban, dense multi-use urban, center city core), geographic location, age of data, and development size. Instructions for using ITEParkGen are included within the app. While data from the *Parking Generation Manual* must be interpreted and applied using sound professional judgment, the report contains the best available data on the subject of parking demand related to land use.

The setting in which the proposed Project is sited is characterized as "Dense Multi-Use Urban" by the *Parking Generation Manual* which defines this setting as "a fully developed area (or nearly so), with diverse and interacting complementary land uses, good pedestrian connectivity, and convenient and frequent transit. This area type can be a well-developed urban area outside a major metropolitan downtown or a moderate size urban area downtown. The land use mix typically includes office, retail, residential, and often entertainment, hotel, and other commercial uses. The residential uses are typically multifamily or single-family on lots no larger than one-fourth of an acre. The commercial uses often have little or no setback from the sidewalk. Because the motor vehicle still represents the primary mode of travel to and from the area, there typically is on-street parking and often off-street public parking. The complementary land uses provide the opportunity for short trips within the Dense Multi-Use Urban area, made convenient by walking, biking, or transit. The area is served by significant transit (either rail or bus) that enables a high level of transit usage to and from area development (*ITE Parking Generation Manual*, 2019)."

Base Parking Demand: High-Turnover (Sit-Down) Restaurants

The ITE Parking Generation Manual, 5th Edition describes High-Turnover (Sit-Down) Restaurants in the following manner: "This land use consists of sit-down, full-service eating establishments with a typical duration of stay of 60 minutes or less. They are commonly referred to as casual dining. This type of restaurant is usually moderately priced and frequently belongs to a restaurant chain. Generally, these restaurants serve lunch and dinner; they may also be open for breakfast and are sometimes open 24 hours a day. These restaurants typically do not accept reservations. A patron commonly waits to be seated, is served by wait staff, orders from a menu, and pays after the meal. Some facilities offer carry-out for a small proportion of its customers. Some facilities within this land use may also contain lounge or bar areas for serving food and alcoholic drinks. The analysis of parking demand for this land use has identified different parking demand rates between high-turnover restaurants with and without lounges. The term "family restaurant" is used interchangeably as an abbreviated version of "high-turnover (sit-down) restaurant without lounge or bar facilities (*ITE Parking Generation Manual,* 2019)."

Based on this definition and the programming of the Project's commercial spaces, the groundfloor restaurants qualify as "High-Turnover (Sit-Down) Restaurants" intended to serve Venice locals and visitors. Restaurant 1 and Restaurant 2 at 1410-1422 Main Street contain 1,873 square feet and 1,237 square feet of gross restaurant floor area, respectively designed to be occupied by high-turnover (sit-down) restaurant operators.

The *ITE Parking Generation Manual, 5th Edition* data found that at high turnover (sit-down) restaurant developments in the Dense, Multi-use Urban Setting, the hours of peak parking demand occur on weekdays between 12pm and 1pm, and between 6pm and 8pm, with between 75 and 100% of the parking capacity occupied. On Saturdays, peak demand is between 10am and 12pm and also between 6pm and 9pm. It's worth noting that the actual peak hours for the groundfloor restaurants proposed for the subject property may be different than those reflected in the *ITE Parking Generation Manual* as they are intended to serve a brunch crowd which typically sees peak patronage on Saturdays and Sundays between noon and 4pm.

Among ten high turnover (sit-down) restaurant sites containing an average of 3,400 square feet of gross floor area per site, the average *weekday* parking demand for the peak period ranged from 3.13-12.41 vehicles per 1,000 square feet of gross floor area, with an average rate of 6.47 vehicles per 1,000 square feet of gross floor area. Across the sites surveyed, the *ITE Manual* finds that 33% of the parking is occupied at a rate of 4.57 occupied parking spaces per 1,000 square feet of gross floor area while 85% is occupied at a rate of 12.37 occupied parking spaces per 1,000 square feet of gross floor area. At this rate, the anticipated peak period parking demand per 1,000 square feet of gross floor area devoted to the high turnover (sit-down) restaurant use within the proposed Project would be 3.13-12.41 vehicles or 5.86-23.24 at Restaurant 1 and 3.87-15.35 at Restaurant 2 during their respective peak hours.

Data for high turnover (sit-down) restaurant parking demand is available for Saturdays when the peak hours are between 10am and 12pm, and between 6pm and 9pm. Again, it's worth noting that the actual peak hours for the groundfloor restaurants proposed for the subject property may be different than those reflected in the *ITE Parking Generation Manual* as they are intended to serve a brunch crowd which typically sees peak patronage on Saturdays and Sundays between noon and 4pm. During this time, parking occupancy ranges from 3.60-12.05 vehicles per 1,000 square feet of gross floor area, with an average rate of 7.19 vehicles per 1,000 square feet of gross floor area. For the subject Project, this equates to a parking demand of 6.74-22.57 vehicles for Restaurant 1, 4.58-15.34 vehicles for Restaurant 2, and an additional 1.68-5.93 vehicles for the groundfloor shared outdoor eating space.

Weekday Base Parking Demand: High Turnover (Sit-Down)	
Average Peak Parking Demand Rate	12.37 per 1,000 sf GFA[1]
Project's Number of Units	1,873 + 1,237 + 467 sf GFA[1]
Base Peak Parking Demand Generated	44 automobiles

Table 4: Base Parking Demand: High Turnover (Sit-Down) Restaurant

Source: *ITE Parking Generation Manual, 5th Edition*
(1) square feet of Gross Floor Area

Weekend Base Parking Demand: High Turnover (Sit-Down)	
Average Peak Parking Demand Rate	7.19 per 1,000 sf GFA[1]
Project's Number of Units	1,873 + 1,237 + 467 sf GFA[1]
Base Peak Parking Demand Generated	26 automobiles

Table 5: Base Parking Demand: High Turnover (Sit-Down) Restaurant
Source: *ITE Parking Generation Manual, 5th Edition*
(1) square feet of Gross Floor Area

Base Parking Demand: Groundfloor Take-out Space (Fast-Food Restaurant without Drive-Through Window)

The *ITE Parking Generation Manual, 5th Edition* describes the category "Fast-Food Restaurants without Drive-Through Window" in the following manner: "This land use includes fast-food restaurants without drive-through windows. This type of restaurant is characterized by a large carry-out clientele, long hours of service (some are open for breakfast, all are open for lunch and dinner, some are open late at night or 24 hours a day) and high turnover rates for eat-in customers. These limited-service eating establishments do not provide table service. A patron generally orders from a menu board and pays before receiving the meal. A typical duration of stay for an eat-in customer is less than 30 minutes."

Based on this definition and the programming of the Project's commercial spaces, the 292-square foot groundfloor take-out space qualifies as "Fast-Food Restaurants without Drive-Through Window" intended to serve Venice locals and visitors.

The *ITE Parking Generation Manual, 5th Edition* only provides data for weekday peak hour parking demand for the "Fast-Food Restaurants without Drive-Through Window" category in Dense, Multii-use Urban Settings. Therefore, to best determine the weekend peak hour parking demand for the take-out restaurant space, this analysis uses the "Fast-Food Restaurant with Drive-Through Window" category. *ITE Parking Generation Manual, 5th Edition* describes the "Fast-Food Restaurants without Drive-Through Window" category in the following manner: "This category includes fast-food restaurants with drive-through windows. This type of restaurant is characterized by a large drive-through and large carry-out clientele, long hours of service (some are open for breakfast, all are open for lunch and dinner, some are open late at night or 24 hours a day) and high turnover rates for eat-in customers. These limited-service eating establishments do not provide table service. A patron generally orders from a menu board and pays before receiving the meal. A typical duration of stay for an eat-in patron is less than 30 minutes. (*ITE Parking Generation Manual,* 2019)." In reality, the take-out space is *not* designed as a drive-through restaurant but is the most closely related category to the functional intent of the shared take-out space provided to be shared by the onsite restaurant operators.

The *ITE Parking Generation Manual, 5th Edition* found that for fast-food restaurants without drive-through windows in the Dense, Multi-use Urban Setting, the hours of peak parking demand occur on weekdays between 11am and 1pm. It's worth noting that the actual peak hours for the groundfloor restaurants proposed for the subject property may be different than those reflected in the *ITE Parking Generation Manual* as they are intended to serve a brunch crowd which typically sees peak patronage on Saturdays and Sundays between noon and 4pm. During weekday peak hour for parking demand, the average *weekday* parking demand ranged from 6.58-15.05 vehicles per 1,000 square feet of gross floor area, with an average rate of 9.61 vehicles per 1,000 square feet of gross floor area. Across the sites surveyed, the *ITE Manual* finds that 33% of the parking is occupied at a rate of 8.42 occupied parking spaces per 1,000 square feet of gross floor area while 85% is occupied at a rate of 15.05 occupied parking spaces per 1,000 square feet of gross floor area. At this rate, the anticipated peak period parking demand per 1,000 square feet of gross floor area devoted to the shared take-out space within the proposed Project would be 6.58-15.05 vehicles or 1.92-4.39 parked vehicles during its respective weekday peak hours.

As stated above, to best determine the *weekend* peak hour parking demand for the take-out restaurant space, this analysis uses the "Fast-Food Restaurant with Drive-Through Window" category. The *ITE Parking Generation Manual, 5th Edition* data found that fast-food restaurants with drive-through windows in the Dense, Multi-use Urban Setting, the hours of peak parking demand occur on Saturdays between 12pm and 2pm, and Sundays between 12pm and 3pm with between 85 and 100% of the parking capacity occupied between 12 and 2pm, regardless of the day. It's worth noting that the actual peak hours for the groundfloor restaurants proposed for the subject property may be different than those reflected in the *ITE Parking Generation Manual* as they are intended to serve a brunch crowd which typically sees peak patronage on Saturdays and Sundays between noon and 4pm.

Among three fast-food restaurants with drive-through windows (in dense, multi-use urban settings) containing an average of 3,400 square feet of gross floor area per site, the average *weekday* parking demand for the peak period ranged from 4.35-8.26 vehicles per 1,000 square feet of gross floor area, with an average rate of 6.21 vehicles per 1,000 square feet of gross floor area. The *ITE Manual* finds that 33% of the parking is occupied at a rate of 5.07 occupied parking spaces per 1,000 square feet of gross floor area while 85% is occupied at a rate of 8.26 occupied parking spaces per 1,000 square feet of gross floor area. At this rate, the anticipated peak period parking demand per 1,000 square feet of gross floor area devoted to the shared take-out space within the proposed Project would be 4.35-8.26 vehicles or 1.21-2.41 during its respective peak hours.

Data for fast-food restaurants with drive-through windows (in dense, multi-use urban settings) is available for both Saturdays and Sundays when the peak hours are between 12pm and 3pm. Since the projected parking demand for Sundays is higher than for Saturdays for this use type in the *ITE Manual*, this analysis uses the Sunday peak-hour parking rate of 7.14-11.71 vehicles per 1,000 square feet of GFA (an average rate of 9.31 vehicles) to project the weekend peak hour parking demand for the shared take-out space on the Project's ground floor. This equates to a parking demand of 2.08-3.42 vehicles for the groundfloor take-out space.

Weekday Base Parking Demand: Take-out Food and Beverage Space	
Average Peak Parking Demand Rate	9.61 per 1,000 sf GFA[1]
Project's Number of Units	292 sf GFA[1]
Base Peak Parking Demand Generated	3 automobiles

Table 6: Base Parking Demand: Fast-Food Restaurant without Drive-Through Window

Source: *ITE Parking Generation Manual, 5th Edition*
(1) square feet of Gross Floor Area

Weekend Base Parking Demand: Take-out Food and Beverage Space	
Average Peak Parking Demand Rate	9.31 per 1,000 sf GFA[1]
Project's Number of Units	292 sf GFA[1]
Base Peak Parking Demand Generated	3 automobiles

Table 7: Base Parking Demand: Fast-Food Restaurant with Drive-Through Window
Source: *ITE Parking Generation Manual, 5th Edition*
(1) square feet of Gross Floor Area

Base Parking Demand: Quality Restaurant

The ITE Parking Generation Manual, 5th Edition describes the Quality Restaurant category in the following manner: "This land use consists of high quality, full-service eating establishments with a typical duration of stay of at least one hour. They are also commonly referred to as fine dining. Quality restaurants generally do not serve breakfast; some do not serve lunch; all serve dinner. This type of restaurant often requests and sometimes requires a reservation and is generally not part of a chain. A patron commonly waits to be seated, is served by wait staff, orders from a menu and pays after the meal. Some of the study sites have lounge or bar facilities (serving alcoholic beverages), but they are ancillary to the restaurant (ITE Parking Generation Manual, 2019)."

Based on this definition and the programming of the Project's commercial spaces, Restaurant 3 on the upper floors qualifies as a "Quality Restaurant." Restaurant 3 contains 1,204 square feet of gross restaurant floor area designed to be occupied by a quality restaurant operator.

The *ITE Parking Generation Manual, 5th Edition* data found that at quality restaurant developments in the Dense, Multi-use Urban Setting, the hours of peak parking demand occur on Fridays between 7pm and 9pm and on Saturdays between 7pm and 8pm. Among the quality restaurant sites surveyed, the average parking demand for the peak period on Fridays ranged from 7.87-14.27 vehicles per 1,000 square feet of gross floor area, with an average rate of 9.81 vehicles per 1,000 square feet of gross floor area. At this rate, the anticipated peak period parking demand per 1,000 square feet of gross floor area devoted to the quality restaurant use within the proposed Project would be 7.87-14.27 vehicles or 9.48-17.18 during its peak hours.

Data for quality restaurants in Dense Multi-use Urban settings is available for Saturdays when the peak hours are between 7pm and 8pm. During this time, parking occupancy ranges from 8.77-23.84 vehicles per 1,000 square feet of gross floor area, with an average rate of 14.08 vehicles per 1,000 square feet of gross floor area. For the subject Project, this equates to a parking demand of 8.77-23.84 or 10.56-28.7 vehicles for Restaurant 3 during its peak hour on Saturdays.

Friday Base Parking Demand: Quality Restaurant	
Average Peak Parking Demand Rate	9.81 per 1,000 sf GFA[1.]
Project's Number of Units	1,204 sf GFA[1]
Base Peak Parking Demand Generated	12 automobiles

Table 8: Base Parking Demand: Quality Restaurant
Source: *ITE Parking Generation Manual, 5th Edition*
(1) square feet of Gross Floor Area

Saturday Base Parking Demand: Quality Restaurant	
Average Peak Parking Demand Rate	14.08 per 1,000 sf GFA[1.]
Project's Number of Units	1,204 sf GFA[1]
Base Peak Parking Demand Generated	17 automobiles

Table 9: Base Parking Demand: Quality Restaurant
Source: *ITE Parking Generation Manual, 5th Edition*
(1) square feet of Gross Floor Area

Base Parking Demand: Market Rate Residential Units

The proposed development Project is mixed-use, combining nineteen mid-rise multifamily residential units (four of them reserved as affordable units) with three restaurant uses. The *Parking Generation Manual* describes the mid-rise multifamily residential as "housing that includes apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and with between three and 10 levels (floors) of residence."

The ITE Parking Generation Manual, 5th Edition data found that in dense, multi-use urban mid-rise multifamily housing developments, the hours of peak parking demand occur on weekdays between 10pm and 5am with between 90 and 100% of the parking capacity occupied. Among 62 dense, multi-use urban sites (without rail transit within half of a mile) containing an average of 104 dwelling units per site, the average parking demand for the peak period ranged from 0.17-2.72 vehicles per dwelling unit with a 33rd percentile rate of 0.63 occupied parking spaces per unit and an 85th percentile rate of 1.27 occupied parking spaces per unit. At this rate, the anticipated peak period parking demand per dwelling unit of the proposed Project would be 0.17-2.72 vehicles per dwelling unit or 2.55-40.8 total occupied parking spaces during the peak hours.

According to *ITE Parking Generation Manual* data, dense, multi-use urban mid-rise multifamily housing developments that are not located within a half-mile of rail transit had an average occupancy rate of 0.85 vehicles per market rate dwelling unit on Saturdays between 11pm and 7am and 1.00 vehicles per market rate dwelling unit on Sundays between 11pm and 7am.

The *ITE Parking Generation Manual* also correlates the ratio of occupied parking spaces with the number of *occupied* dwelling units for dense, multi-use urban mid-rise multifamily housing developments that are not within a half-mile of rail transit. For the peak hour (Monday through Friday, 10pm-5am), across 51 studies averaging 88 occupied dwelling units per site, the average rate of occupied parking spaces per occupied dwelling unit was 0.77 vehicles per occupied unit with a 33rd percentile rate of 0.17 vehicles per occupied unit and an 85th percentile rate of 1.54 vehicles per occupied unit. For the proposed development, that translates to an anticipated parking ratio of 0.17-1.54 parking spaces per occupied dwelling unit or 2.55-23.1 total vehicles per occupied market rate dwelling unit during peak hours.

Base Parking Demand: Market Rate Residential Units[1]	
Average Peak Parking Demand Rate	0.9 spaces per dwelling unit
Project's Number of Units	15 market rate dwelling units
Base Peak Parking Demand Generated	14 automobiles

Table 10: Base Parking Demand: Market Rate Residential Units
Source: *ITE Parking Generation Manual, 5th Edition*
(1) Four of the Project's 19 dwelling units will be restricted to Very Low Income households

Base Parking Demand: Affordable Residential Units

As stated above, the proposed development combines fifteen market rate residential units with four units of affordable residential units, and three restaurant uses. The *ITE Parking Generation Manual, 5th Edition* defines affordable housing as "all multifamily housing that is rented at below market rate to households that include at least one employed member (*ITE Parking Generation Manual*, 2019)." The *Parking Generation Manual* offers separate data plots and statistics for subsets of the affordable housing database: sites with income limitations for its tenants, sites with minimum age thresholds for its tenants (i.e., senior housing), and sites comprised entirely of single-room-only units. The proposed affordable housing units fall within the first category: "sites with income limitations for its tenants." As a standard condition of its approval, the Project will be required to execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to make four restricted affordable units available to Very Low Income Households.

According to *ITE Parking Generation Manual* data from 19 studies with an average of 109 units per study site, dense, multi-use urban mid-rise affordable multifamily housing developments that are not located within a half-mile of rail transit had an average occupancy rate of 0.53 vehicles per unit with

33rd and 85th percentiles ranging from 0.46-1.00 occupied parking spaces per affordable dwelling unit. For the proposed development, that translates to an occupancy rate of 1.84-4 automobile parking spaces for the affordable units during peak parking demand periods.

The ratio of occupied parking spaces to occupied affordable housing units in dense, multi-use urban mid-rise affordable multifamily housing developments averages 0.55 vehicles per occupied affordable housing unit. This data was collected from 17 studies averaging 113 occupied dwelling units per study.

Base Parking Demand: Affordable Residential Units	
Average Peak Parking Demand Rate	0.53 spaces per affordable dwelling unit
Project's Number of Units	4 affordable dwelling units
Base Peak Parking Demand Generated	2 automobiles

Table 11: Base Parking Demand: Affordable Residential Units
Source: *ITE Parking Generation Manual, 5th Edition*

Parking Demand Management Strategies

Municipalities and developers have three options to address parking demand (see Table 12 below). They can increase the parking supply. They can manage the existing supply. And they can discourage the use of single-occupant vehicles. Table 12 lists these three approaches along with examples of each. The Project employs all three strategies by including providing 24 parking spaces for its residential dwelling units (using an "unbundled" parking model) and four parking spaces for its commercial restaurants while also providing dedicated onsite micromobility for use of its residents, increased bicycle parking facilities, fully subsidizing the use of public transportation for its residents, and by volunteering a local hire condition for its restaurant employees.



Table 12: Methods of Addressing Parking Demand

Minimum parking standards are designed to accommodate the highest anticipated peak demand in lieu of implementing parking demand management (PDM) strategies, even though management strategies are more cost effective and provide the greatest total benefits (Litman, 2005). Increasing parking supply exacerbates urban sprawl by requiring the over provision of parking spaces, lowering the resultant density of commercial and residential development and encouraging further car dependence (Shoup, 2005). As described in Part I of this report, the Venice Coastal Zone is already a dense urban context with an integrated mix of residential, commercial, and employment resources well-served by public and active transportation infrastructure. Despite its favorable design, much of the Venice Coastal Zone, especially the area containing the Project site, is also well-supplied with parking for SOVs (Fehr & Peers, 2021). It is now well-accepted among urban planners and elected and appointed officials that "Excessive parking requirements waste resources: directly, by increasing the money and land devoted to parking facilities; and indirectly, by leveraging an increase in automobile use and sprawl (Litman, 2005)."

The proposed Project includes PDM strategies for its residential and restaurant uses. The PDM strategies are listed in the figure below. PDM strategies provide Project-based and area-wide benefits when implemented in contexts supported by infrastructure and supplementary policy. As a bonus to developers, these benefits can be economically neutral if they are funded through parking cost savings (Litman, 2005).

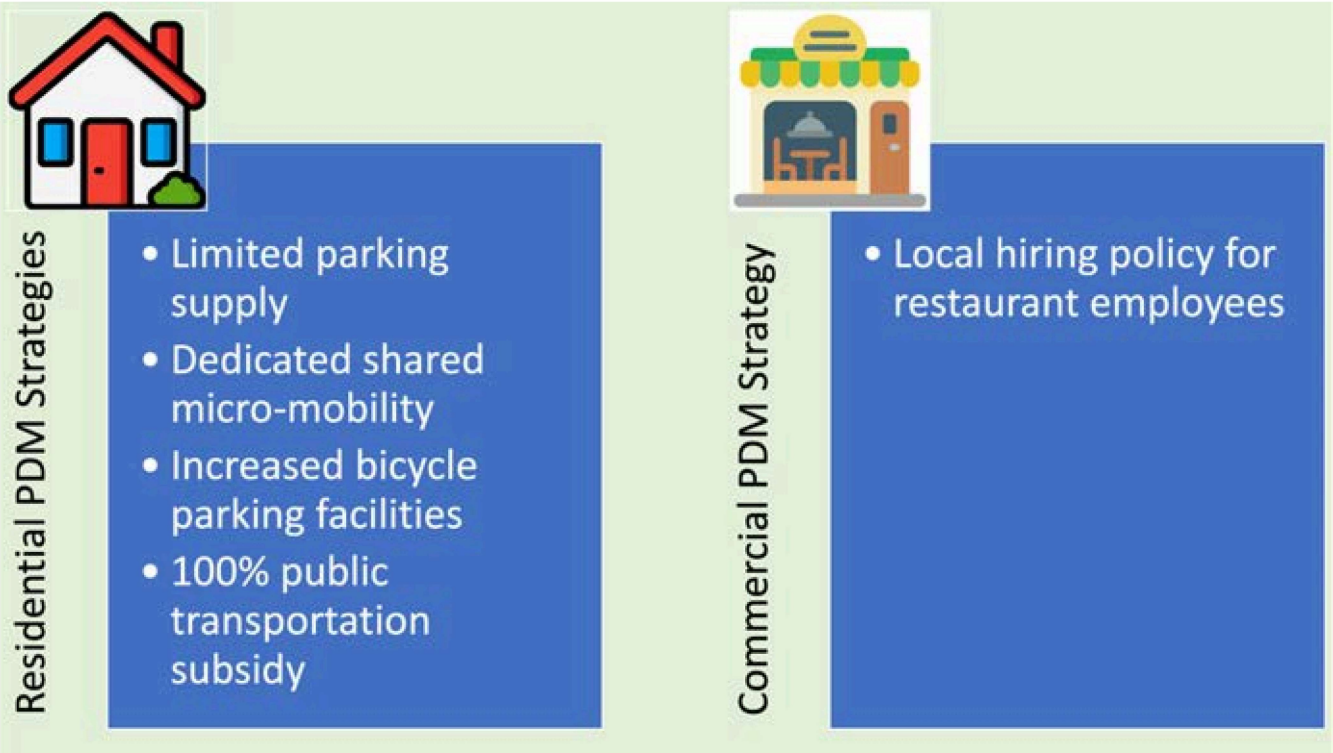


Figure 7: PDM Strategies for 1410-1422 Main Street mixed-use Project

In the pages that follow, this report analyzes the potential parking demand reductions associated with each proposed strategy (where data is available), discusses the mechanics of each strategy including implementation details, presents co-benefits associated with each strategy, and considers precedent for each strategy in the Coastal Zone, if any.

Residential Parking Demand Management Strategies

Residential Parking Demand Management Strategy: Limited Parking Supply

Strategy Description

Both pricing and limiting available parking supplies have a negative impact on parking demand as both add "costs" to the end user in the forms of financial and time-related expenses. The application of parking pricing and supply restrictions is the most widely accepted method of limiting car use (IHT, 2005). Additionally, a greater stimulus to change behavior appears to be provided by the supply restrictions rather than through pricing (Marsden, 2006). Studies have shown that, when supply was restricted, SOV parking demand greatly decreases as non-monetary costs were capitalized into the choice to drive a vehicle to respective destinations. One study by Gantvoort, J.T., et al. found that SOV mode choice reduced by approximately 20% among commuters three months after their 200-capacity parking facility was permanently closed (Gantvoort, 1984). Importantly, 45% of the sample of commuters included in the study felt that they were "captive" to their cars because of a lack of alternative mode choices which would be thoroughly addressed by the transportation options provided by the proposed development and already existing near the Project site within the Venice Coastal Zone (see "Existing Conditions" above). Therefore, the expected parking demand reduction as a result of parking supply restriction would be considerably higher for the subject Project.
The proposed development includes four parking spaces devoted to its commercial uses and twenty-four parking spaces devoted to its residential units. As part of its 'unbundled' parking model, the Project will charge $250 per month per residential parking space for residents who choose to purchase a parking lease in conjunction with their residential lease.

Range of Effectiveness

- 10-30% observed mode shift
    - Effectiveness of parking demand reduction strategy largely based on correlating supportive strategies like Smart Growth development, public transportation access, and the accessibility of urban job centers, all of which are applied near the Project site

Discussion

Controlled parking supply can impact the number of vehicles being driven to (and from) a site. The vast majority of studies that address the relationship between parking supply and mode choice are based on commercial PDM measures aimed at employee vehicles or areawide PDM measures targeting patrons of a commercial district or Central Business District (CBD). It is difficult to seamlessly translate reductions in employee and consumer transportation modes to reductions in resident transportation modes because, while employees and consumers may reduce their parking demand while still maintaining vehicle ownership, residents usually have to completely relinquish the ability to own a vehicle in order for parking supply restrictions to result in lower parking demand.

In terms of elasticity, consumer parking demand is the most elastic in response to supply restrictions since, typically, consumers have a variety of commercial options to fulfill their needs. If a consumer finds it difficult to locate parking near their commercial destination, the consumer will typically choose either not to make the trip or to make the trip to a different commercial destination. Employee parking demand is, by contrast, less elastic since employees cannot usually choose their work location based on the availability of parking facilities. They must choose to either change their mode of transportation to work or shift the time that they report to the worksite, if that option is available. For residential parking demand, none of the same options are available. If parking supplies are severely limited, then residential tenants only have the options of relinquishing their ability to own a vehicle, choosing an alternative residential location, or parking illegally which comes with high costs imposed by local municipal enforcement mechanisms (i.e., ticketing and towing). The consultant team expects that these circumstances will lead to a dramatic reduction in residential parking demand at the site, especially since the supply restriction strategy is combined with multiple others including proximity to mixed uses, the provision of subsidized alternative modes, and an added cost for renting said residential parking spaces.

Precedence in the Venice Coastal Zone

There isn't a specific statistic readily available for the percentage of housing units in Venice, CA, with fewer dedicated parking spaces than are required by the VCZSP. However, before the wide commercial popularization of SOVs in the 1950s, it was common for housing units to lack dedicated parking spaces. Furthermore, even for older housing units constructed with assigned parking facilities, these facilities are often too small to accommodate modern vehicle sizes so these units, effectively, also lack designated usable parking spaces. This is likely a key factor in the relatively low per capita rate of car ownership seen across the census tract and discussed in the 'Existing Conditions' section (American Community Survey 2015-2019).

After the implementation of AB 2097 (Friedman, 2022) prohibited local agencies from imposing minimum automobile parking requirements upon new and existing developments near major transit across the state, the California Coastal Commission released a memorandum discussing "how the Commission and local governments can impose other types of conditions in these areas to ensure projects and LCPs [Local Coastal Programs] are consistent with the public access and recreation policies of the Coastal Act and certified LCPs." The memorandum goes on to acknowledge the ways in which minimum parking requirements have led to harmful development patterns and conflicts with other modes of transportation. It then lays out alternative methods for local government agencies to ensure that they are protecting coastal access and reducing recreation impacts in the Coastal Zone (California Coastal Commission, 2023).

Co-Benefits

- Lowers development costs
- Increases density and mix of uses
- Encourages the use of alternative modes

- 5-12.5% VMT reduction (CAPCOA, 2010)
- 5-12.5% reduction in GHG emissions (CAPCOA, 2010)
- Reduces run-off and water quality impacts

Residential Parking Demand Management Strategy: Dedicated Shared Micromobility

Strategy Description

Micromobility refers to the transportation of people using small, lightweight vehicles for short distances (typically up to five miles). These vehicles are designed for one or two passengers and are often powered by electric motors. Common examples of micromobility vehicles include electric scooters, electric bicycles (e-cargo bikes), and electric skateboards. Micromobility solutions have gained popularity in urban areas as a means of addressing challenges related to congestion, pollution, and the "last mile" problem in public transportation. Companies offering micromobility services operate through smartphone apps, allowing users to locate, unlock, and rent vehicles for short trips. Overall, micromobility aims to provide convenient, environmentally friendly, and cost-effective transportation options for short-distance travel within cities and urban areas.

The proposed Project includes a shared micromobility service for the exclusive use of the residential tenants. In addition to the forty-five long- and short-term bicycle parking spaces provided in the Project's garage and front yard (respectively) the Project includes six parking spaces for shared micromobility devices - e-cargo bikes equipped with baskets to be parked in a long-term bicycle parking area in the Project's garage. The specific company contracted to provide shared micromobility services - including the physical, technological, and logistic assets required to yield the amenity - is called Ridy. The Ridy electric micromobility devices will be located in the Project's garage in dedicated parking spaces with charging equipment for the six electric devices. They can be reserved through the Ridy mobile application. Building residents will share the devices amongst each other with insurance, maintenance, and customer service provided by Ridy at the expense of the property owner. Device users are responsible for the devices they rent while the devices are in their possession, however, residents will have access to the devices free of charge.

Although shared micromobility is a relatively new approach to parking demand management, according to some estimates, 5-10% of automobile trips can reasonably be shifted to non-motorized transport in a typical urban area (Mackett, 2001). When driving disincentives reduce automobile travel, typically 10-35% of the reduced trips shift to walking and cycling (Online TDM Encyclopedia).

Range of Effectiveness

- Unknown but, based on research on similar strategies that correlated increased walking and cycling with design improvements: 10-35% reduction in SOV trips

Discussion

Micromobility operators have long known that the car is an expensive and burdensome option for short trips *within* urban neighborhoods. This fact is a key input in their business models as well as those of government agencies who have invested in efforts to bolster their uptake. Research indicates that 49% of all of the trips made in the City of Los Angeles are three miles or less (Reed, 2019). The portion of short trips is likely much higher in areas, like the Venice Coastal Zone, where residential and commercial uses are dense and mixed.

In a study conducted by Roger L. Mackett for the Centre for Transport Studies at University College London, 1,121 households were selected at random to answer a survey about their travel habits as they pertained to "short trips" which, for the Mackett study, were defined as trips of five or fewer miles. Data were collected about all their trips over two days. These data were examined and a selection of people who had made short trips by car were interviewed in depth about those trips to examine their attitudes toward alternatives to using the car. The interviewee's responses were coded from unstructured answers into categories.

The table below shows the grouped reasons interviewees gave for using a car for short trips (interviewees were allowed to give more than one response).

Reason for Using Car	Number of Responses	% of Responses
1. No alternative	164	5%
2. Nature of trip	1607	46%
3. Convenience	996	28%
4. Temporary	763	22%
Total	**3530**	**100%**

Table 13: Grouped reasons for using the car from the surveys
Source: (Mackett, 2001)

The "No alternative" grouping was characterized by trip types for which the car is the only practical option, for example, the respondent needs their car for work so, even though the trip to their primary work site is a short one, they'll need their car to make home visits or run work-related errands throughout the day. The "Nature of trip" grouping included trips in which multiple destinations were linked into a single trip which can be mitigated by a dense mix of uses - for instance, grocery stores, pharmacies, gyms, and doctors' offices all within proximity to each other. That category also included trips on which respondents had to carry items, like groceries, and trips with unpleasant conditions for alternative modes (i.e., lack of safe infrastructure or street lighting, etc.). Interestingly, the

"Convenience" response group included reasons like "there are free parking facilities at my destination." This response speaks to the persuasive nature of free, convenient parking in the mode choice decision-making process. Finally, the response group "Temporary" characterizes trips for which a car was used for a unique reason but for which a different mode would have been used had temporary conditions been different. For this category, 260 respondents specifically cited poor weather as their reason for using a car for the short trip.

The PDM strategies integrated into the proposed Project address all of the response categories except for the "No alternative," for which the only mitigation would be a change in the respondent's job. Specifically, the shared mobility devices will not only facilitate residents' use of e-biking but can also be used to travel the "first/last mile" distance to public transportation facilities such as the Metro E Line rail station approximately 2 miles from the proposed development site. It should also be noted that the study was conducted in London where the weather conditions are more likely to include precipitation and low temperatures than Venice, CA where the average yearly low temperature is 56°F and the rainiest months see four days of rain per month (National Oceanic and Atmospheric Administration).

The inclusion of e-cargo bicycles in the fleet of shared mobility devices available to building residents through Ridy will help address trips, like grocery shopping, that would otherwise favor SOV use. Furthermore, the existing conditions of the surrounding area - namely the robust presence of public transportation options and the dense mix of uses - will encourage and bolster the use of the building's shared mobility devices.

More details on the products, services, and anticipated uptake of Ridy's devices are provided in Appendix B.

Precedence in the Venice Coastal Zone

After the implementation of AB 2097 (Friedman, 2022) prohibited local agencies from imposing minimum automobile parking requirements upon new and existing developments near major transit across the state, the California Coastal Commission released a memorandum discussing "how the Commission and local governments can impose other types of conditions in these areas to ensure projects and LCPs [Local Coastal Programs] are consistent with the public access and recreation policies of the Coastal Act and certified LCPs." The memorandum goes on to acknowledge the ways in which minimum parking requirements have led to harmful development patterns and conflicts with other modes of transportation. It then lays out alternative methods for local government agencies to ensure that they are protecting coastal access and reducing recreation impacts in the Coastal Zone. "Micromobility programs, such as bicycle and electric scooter rentals" are named among the strategies for maximizing public access and recreational opportunities (*Implementation of Assembly Bill 2097*, 2023).

Co-Benefits

- Lower GHG
- Reduction in individual transportation costs

- Reduction in collective transportation costs
- Health benefits of active mobility modes
- Increase in use of public transportation
- Reduced traffic congestion

Residential Parking Demand Management Strategy: Increased Bicycle Parking Facilities

Strategy Description

The proposed Project is required by Los Angeles Municipal Code to provide bicycle parking facilities. For projects with 1-25 dwelling units, the Municipal Code requires one short-term bicycle parking space for every ten units (0.1 space per unit) and one long-term bicycle parking space for each unit (LAMC 12.21. A.16.). The Project proposes nineteen residential units (atop groundfloor commercial units) resulting in a residential bicycle parking requirement of 21 bicycles (two short-term and nineteen long-term). However, the Project is proposing to provide thirty-eight residential bicycle parking spaces (along with seven commercial bicycle parking spaces). This does not include the Ridy shared micromobility parking spaces (which include spaces for six e-cargo bicycles. With twenty-seven total bicycle parking spaces devoted to its nineteen residential units (totaling twenty-seven bedrooms), there are enough bicycle parking spaces for each bedroom occupant to store a bicycle (either shared or owned). The long-term bicycle parking facilities are designed to prioritize safety and ease of access. Located in the subterranean parking garage, the long-term bicycle parking room is covered from theft and weather while being easily accessible from the building's stairs and elevator.

According to studies of factors affecting travel behavior, providing bicycle storage facilities decreases parking demand by 5-15% (Litman, 2005).

Range of Effectiveness

- 5-15% parking demand reduction

Discussion

Bicycle parking, storage, and shower/changing rooms (collectively called "end-of-trip" facilities) increase the convenience and security of cycling. According to *Parking Management Best Practices*, optimal bicycle parking supply depends on the level of cycling activity in an area and the type of destination. End-of-trip facility improvements can increase cycling and reduce automobile trips. Many destinations can benefit from improved bicycle parking and changing facilities, particularly in areas with high potential levels of bicycling (Litman, 2005). The provision of ample bicycle parking at multifamily residential developments can result in modal shifts, reductions in car ownership, encouragement of active transportation, and can be even more impactful when it complements public transportation.

The Venice Coastal Zone is already an area with a high concentration of bicycle facilities such as Class I, II, and IV bicycle paths. As discussed in the 'Existing Conditions' section, above, 19.1% of commuters in the census tract surrounding the Project site participate in "Active Commuting" which includes all workers over the age of 16 who use transit, walking, or cycling to get to and from their work sites. This is compared to 8.99% who do so on a statewide level, 9.65% who do so on a countywide level, and 14% who do so on a citywide level. This is likely due to both the mild weather conditions that

characterize the region and the concentration of quality on- and off-street cycling facilities, among other factors. Cycling tends to be most common during mild weather (Litman, 2005). Incorporating end-of-trip facilities into the proposed development should have an outsized impact on parking demand - that is, the impact should be greater in the Venice Coastal Zone given its geographic and demographic context.

One of the most documented strategies for reducing parking demand is providing well-protected long-term bicycle parking for commuters, residents or anywhere else cyclists will leave a bicycle for several hours. Quality bicycle parking and other end-of-trip facilities make cycling more convenient and secure. This can reduce automobile travel and parking demand and provide various benefits associated with shifts from motorized to non-motorized travel, including reduced traffic congestion and pollution emissions, and improve public health (Litman,2005).

It's worth noting that the Los Angeles Municipal Code allows new or existing automobile parking spaces required by the Code for all uses to be replaced by bicycle parking at a ratio of one standard or compact automobile parking space for every four required or non-required bicycle parking spaces provided. This bicycle parking replacement can compensate for the provision of 20% of the otherwise required non-residential automobile parking spaces and up to 30% of the otherwise required residential automobile parking spaces (LAMC 12.21. A.4.). The proposed development is not proposing the replacement of any automobile parking spaces with bicycle parking as part of its entitlement requests but is, nonetheless, providing the requisite number of bicycle parking spaces.

Precedence in the Venice Coastal Zone

After the implementation of AB 2097 (Friedman, 2022) prohibited local agencies from imposing minimum automobile parking requirements upon new and existing developments near major transit across the state, the California Coastal Commission released a memorandum discussing "how the Commission and local governments can impose other types of conditions in these areas to ensure projects and LCPs [Local Coastal Programs] are consistent with the public access and recreation policies of the Coastal Act and certified LCPs." The memorandum goes on to acknowledge the ways in which minimum parking requirements have led to harmful development patterns and conflicts with other modes of transportation. It then lays out alternative methods for local government agencies to ensure that they are protecting coastal access and reducing recreation impacts in the Coastal Zone. The provision of "adequate bicycle parking and lockers" is named among the strategies for maximizing public access and recreational opportunities (*Implementation of Assembly Bill 2097*, 2023).

Co-Benefits

- Lower VMT
- Lower GHG
- Reduction in individual transportation costs
- Reduction in collective transportation costs
- Health benefits of active mobility modes
- increase in use of public transportation
- Reduced traffic congestion

Residential Parking Demand Management Strategy: 100% Public Transportation Subsidy

Strategy Description

The Proposed development will offer unlimited year-long Metro TAP cards to all residential tenants. Metro TAP cards are the only method of payment (other than exact cash amounts) for Metro buses and trains. A TAP card is a durable plastic card with a "smart" chip designed to make the transit experience simple and secure. TAP cards can be loaded electronically with regional and local transit passes, Stored Value (cash amount) or transfers. Transit users tap their cards on the TAP target each time they board a bus or train and the farebox, validator, or turnstile will deduct the correct fare. TAP cards are offered for sale through the Los Angeles County Metropolitan Transportation Authority (branded as Metro) the county agency that plans, operates, and coordinates funding for most of the public transportation system.

Typically, TAP cards cost transit users $2 for the durable plastic card plus the cost of ride fare, which can range from $1.75 for a single bus or train ride (including transfers within three hours of the initial boarding) to $5 for a daylong ride pass useable on buses and trains for 24 hours from the initial boarding. Metro issues month-long and year-long unlimited ride TAP cards to organizational customers (typically large employers) at a cost of $78 for a month-long unlimited ride pass and $936 for a year-long unlimited ride pass. Upon requests from individual tenants, the development will offer TAP cards that include system reciprocity with transit providers other than the Los Angeles County Metropolitan Transportation Authority. Other nearby transit operators include the Big Blue Bus (operated by the City of Santa Monica) and the CityBus (operated by Culver City). In total, the Metro TAP card provides access to 27 city and regional transit operators across LA County.

Range of Effectiveness

- 10-30% reduction in automobile travel (VTPI, 2023; Litman, 2005)

Discussion

Most evaluation studies point to the overwhelming effectiveness of financial incentives and disincentives to manage demand (FHWA, 2012). Financial incentives provide travelers with financial benefits for reducing their automobile trips ("Commuter Financial Incentives," VTPI, 2005). These benefits reflect the cost savings that result from reduced parking demand and the attendant reduction in parking facility construction and maintenance. There are various types of financial incentives, including "parking cash-outs" which occur when residents who are offered subsidized parking can choose cash instead. Transit benefits are a strategy in which residents receive subsidized transit passes. Universal transit passes are a strategy in which residents receive transit passes for all members. The "universal

transit pass" PDM strategy employed by the proposed Project essentially amounts to a financial incentive in the amount of approximately $1,000 per year for a standard year-long unlimited ride pass and $1,300 per year for a year-long unlimited ride pass with system reciprocity.

The table below shows the percentage reduction in vehicle trips that typically result from a transit or rideshare subsidy. For example, a $1 (1993 U.S. dollars) per day transit subsidy at a transit-oriented activity center is likely to reduce automobile commute trips by about 11%. The Project's provision of 100% subsidized TAP cards (with system reciprocity) to its residents amounts to a subsidy of approximately $2.60 per day. The Project intends to charge $250 per month for each residential parking space as part of its residential "unbundled" parking model.

These vehicle trip reductions tend to increase over time as travelers become more familiar with alternative modes and take these incentives into account when making long-term vehicle purchase and home location decisions. Transit subsidization can be more effective if implemented in conjunction with other rideshare encouragement and transport management strategies, such as the reduced automobile parking, increased bicycle parking, provision of shared micromobility devices, and "unbundled" parking model planned for the Project.

Financial incentives are an effective way to reduce parking and vehicle traffic travel demand, congestion, traffic accidents, and pollution emissions. They tend to increase equity by offering non-driver benefits comparable to parking subsidies provided to motorists. They are typically appropriate if a development site has inadequate parking supply, leases parking spaces, or in other ways can save money by reducing the demand for parking facilities.

Table 14: Percentage Vehicle Trips Reduced by Daily Subsidy (1993 U.S. Dollars)

Worksite Setting	Daily Parking Charge (2000 U.S)				
	$0	$1.30	$2.60	$4.00	$5.20
Low density suburb, rideshare oriented	13.0	20.8	28.4	34.9	40.0
Low density suburb, mode neutral	12.7	22.4	32.8	42.9	51.5
Low density suburb, transit oriented	12.6	22.9	34.5	46.1	56.5
Activity center, rideshare oriented	20.1	29.3	36.6	41.8	45.5
Activity center, mode neutral	21.2	33.0	42.9	50.4	55.8
Activity center, transit oriented	24.0	40.5	55.8	68.6	78.3
Regional CBD/Corridor, rideshare oriented	19.6	26.2	30.6	33.5	35.3
Regional CBD/Corridor, mode neutral	26.3	37.5	45.4	50.7	54.1
Regional CBD/Corridor, transit oriented	34.8	52.3	65.6	74.9	81.1

Table 14: Values in the table indicate the percentage reduction in commute trips compared with no fees or subsidies.
Source: Comsis Corporation, 1993

Rideshare oriented refers to locations where ridesharing (carpools and vanpools) provides more than half of all commute travel by alternative modes. *Mode neutral* refers to locations where ridesharing and

transit represent about the same portion of alternative commute travel. *Transit oriented* refers to locations where transit provides more than half of all commute travel by alternative modes. Mode neutral most accurately describes the Venice Coastal Zone alternative mode behavior.

Precedence in the Coastal Zone

After the implementation of AB 2097 (Friedman, 2022) prohibited local agencies from imposing minimum automobile parking requirements upon new and existing developments near major transit across the state, the California Coastal Commission released a memorandum discussing "how the Commission and local governments can impose other types of conditions in these areas to ensure projects and LCPs [Local Coastal Programs] are consistent with the public access and recreation policies of the Coastal Act and certified LCPs." The memorandum goes on to acknowledge the ways in which minimum parking requirements have led to harmful development patterns and conflicts with other modes of transportation. It then lays out alternative methods for local government agencies to ensure that they are protecting coastal access and reducing recreation impacts in the Coastal Zone. The report recommends "transportation demand management programs, such as providing transit passes to workers, students, or residents" among the strategies for maximizing public access and recreational opportunities (*Implementation of Assembly Bill 2097*, 2023).

Co-Benefits

- Lower VMT
- Lower GHG
- Reduction in individual transportation costs
- Reduction in collective transportation costs
- Health benefits of active mobility modes (use of public transportation modes typically requires some amount of walking, cycling, or other active modes for first-/last-mile coverage)
- increase in use of public transportation
- Reduced traffic congestion

Commercial Parking Demand Management Strategy

Commercial Parking Demand Management Strategy: Local Hire Policy

Strategy Description

Local hire programs are generally defined as programs that require contractors, developers, and other types of employers to hire residents from a specific geographic area. These policies typically establish criteria or preferences for hiring, such as requiring a certain percentage of employees to be local residents, offering incentives for hiring local workers, or giving priority to local job seekers in the recruitment process. The proposed Project includes a "local hire" provision that compels the High Turnover (Sit-Down) and Quality Restaurant tenants to make a good faith effort to employ restaurant staff from the local workforce. Although "local workforce" is a somewhat subjective term, Venice Coastal Zone precedence (see 'Precedence in the Coastal Zone' below), workers will generally be sourced from the area historically designated as Venice, CA. The restaurant's local hire policy will be volunteered as a condition of the Project's approval and the restaurant tenant will need to work closely with the Council office (Council District 11) to design and implement a hiring program that gives priority to job candidates from disadvantaged Venice communities.

Range of Effectiveness

Up to a 15% reduction in employee vehicle miles traveled

Discussion

It is well-known that the dispersion of employment activities across regions lengthens commutes. However, the elasticity of parking demand due to local hire programs at a single job site can vary significantly depending on various factors such as the size of the workforce, availability of alternative transportation options, local commuting patterns, and the specifics of the local hire program itself. Studies of the impacts of residential-employment proximity tend to focus on regional or municipal-wide programs and effects. Most indicate that increases in employment density yield the most benefits if adopted as a part of a coordinated set of strategies rather than in isolation (Circella, et al., 2014).

Local hire programs typically aim to increase the number of employees residing within close proximity to the job site, thereby reducing the need for long commutes and potentially lowering parking demand. The elasticity of parking demand in response to such programs would depend on how effectively they incentivize local residents to work at the job site and how much flexibility there is in the workforce's commuting behavior. In areas, like Venice, where alternative transportation options are readily available and commuting distances are relatively short, the anticipated elasticity of parking demand should be greater, as employees may be more inclined to use public transit, walk, or bike to work if they live nearby.

The farthest address from the Project site within the area identified as Venice, CA is 1.45 miles away. Most studies use a 5–7-mile radius. Therefore, it is realistic to presume that a plurality of the restaurant's employees can be sourced from the region's local workforce supply. Based upon the demography and demonstrated commuting behavior in the area, the Project expects the local higher policy to result in a significantly reduced demand in employee parking.

Precedence in the Coastal Zone

As a condition of its approval on October 21, 2020, the mixed-use development located at 1011 Electric Avenue; 1021-1051 South Abbot Kinney Boulevard (ZA-2012-3354-CUB-CU-CDP-MEL-WDI-SPP-SPR) was required to institute a Local Hire Program. The language, contained in Entitlement Condition #22 of the Letter of Determination issued by the West Los Angeles Area Planning Commission specifically says: "The Applicant shall utilize best efforts, where feasible, to locally hire from disadvantaged communities in Venice, in consultation with Council District 11."

The subject Project plans to volunteer a similar condition of approval for its high turnover (sit-down) and quality restaurant uses.

Co-Benefits

- Reduced VMT
- Reduced GHG
- Lower individual transport costs
- Local economic development

Conclusion

The study finds that, at most periods of operation, there is adequate parking inventory to support the demand generated by the planned Project in the form of dedicated onsite parking spaces and publicly available on- and off-street parking. Based upon parking demand estimates gathered from the *ITE Parking Generation Manual, 5th Edition*, the residential uses in the planned Project are well-supported by the onsite residential automobile and bicycle parking provided. However, during midday summer weekend periods, the area's existing parking supplies are strained. Some amount of the midday summer weekend parking demand generated by the restaurant uses may be reduced by the Project's volunteered local hire policy. Additionally, the City and surrounding region include existing and planned infrastructure to support the use of alternative transportation modes for visitors to the coast.

Findings

- There is adequate parking supply in publicly- and privately-owned parking lots surrounding the weekday and weekend evening hours for excess parking demand generated by the restaurant and residential uses.

- Commercial operators on and around Main Street don't generally provide parking for their commercial patrons.

- Parking Demand Management Strategies such as local hire policies for the restaurants' employees can reduce commercial parking demand.

- Existing and planned infrastructure support resident and visitor alternatives to automobile transportation.

Appendix A: On-street Parking Data and Photographs

Weekday Evening Parking Utilization Rates

Street Name	From	To	No. of Parked Cars	Total Curb Capacity (Feet)	Total Curb Capacity (No. of Vehicles @ 17.7 ft)	Utilization Rate	Appxmt No. of Available Spaces
Westminster	Pacific	Main	8	428	25	32.00%	17
Westminster	Main	Riviera	40	885	50	80.00%	10
Westminster	Riviera	Abbot Kinney	8	161	9	87.95%	1
Riviera	Westminster	Windward	41	772	44	94.00%	3
Windward	Windward Circle	Cabrillo	70	1557	88	79.58%	18
Main	Brooks/AK	Horizon	66	2066	117	56.54%	51
Market	Main	Cabrillo	73	1466	83	88.14%	10
Cabrillo	San Juan	Andalusia	52	1518	86	60.63%	34
Horizon	Speedway	Riviera	87	1800	102	85.55%	15
San Juan	Main	Cabrillo	35	905	51	68.45%	16
Altair	Cabrillo	Windward Ave	41	1077	61	67.36%	20
Andalusia	Rialto	Abbot Kinney	11	510	29	38.18%	18
					Avg. Utilization Rate	**69.87%**	**211**

Weekday Evening Parking Utilization Rates

Street Name	From	To	No. of Parked Cars	Total Curb Capacity (No. of Spaces)	Metered?	Utilization Rate
Main Street	Windward Circle	San Juan	18	18	yes - 2 hr, 8am-8pm	100%
Park Row	Market	Windward	8	8	yes - 1 hr, 8am-6pm	100%
Market	Pacific	Main	5	5	yes - 1 hr, 8am-6pm	100%
Andalusia	Abbot Kinney	Alhambra Ct	3	3	no	100%

Midday Weekend Parking Utilization Rates

Street Name	From	To	No. of Parked Cars	Total Curb Capacity (Feet)	Total Curb Capacity (No. of Vehicles @ 17.7 ft)	Appxt No. of Available Spaces	Utilization Rate
Westminster	Pacific	Main	25	428	25	0	100.00%
Westminster	Main	Riviera	47	885	50	3	94.00%
Westminster	Riviera	Abbot Kinney	8	161	9	1	87.95%
Riviera	Westminster	Windward	35	772	44	9	80.25%
Windward	Windward Circle	Cabrillo	69	1557	88	19	78.44%
Main	Sunset	Horizon/San Juan	89	2066	117	28	76.25%
Market	Main	Cabrillo	77	1466	83	6	92.97%
Cabrillo	San Juan	Andalusia	69	1518	86	17	80.45%
Horizon	Speedway	Riviera	95	1800	102	7	93.42%
San Juan	Main	Cabrillo	43	905	51	8	84.10%
Altair	Cabrillo	Windward Ave	43	1077.3	61	18	70.65%
Andalusia	Rialto	Abbot Kinney	28	510	29	1	97.18%
						115	**86.30%**

Midday Weekend Parking Utilization Rates

Street Name	From	To	No. of Parked Cars	Total Curb Capacity (No. of Spaces)	Metered?
Main Street	Windward Circle	San Juan	17	18	yes - 2 hr, 8am-8pm
Park Row	Market	Windward	7	8	yes - 1 hr, 8am-6pm
Market	Pacific	Main	5	5	yes - 1 hr, 8am-6pm

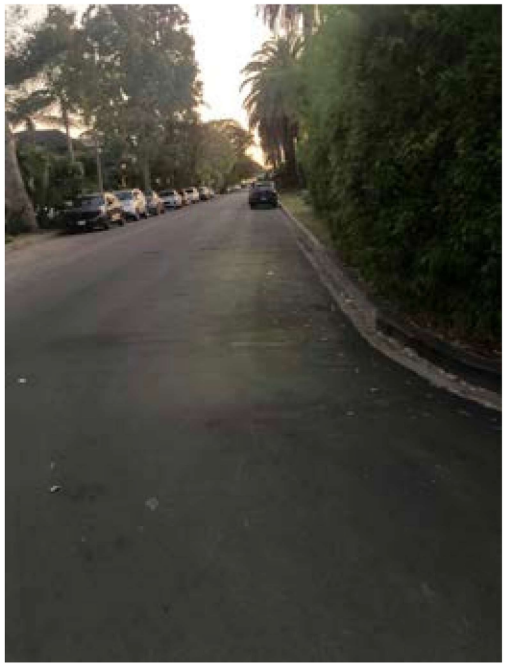
Evening Weekend Parking Utilization Rates

Street Name	From	To	No. of Parked Cars	Total Curb Capacity (Feet)	Total Curb Capacity (No. of Vehicles @ 17.7 ft)	Appxt No. of Available Spaces	Utilization Rate
Westminster	Pacific	Main	25	428	25	0	100.00%
Westminster	Main	Riviera	50	885	50	0	100.00%
Westminster	Riviera	Abbot Kinney	8	161	9	1	87.95%
Riviera	Westminster	Windward	37	772	44	7	84.83%
Windward	Windward Circle	Cabrillo	70	1557	88	18	79.58%
Main	Sunset	Horizon/San Juan	107	2066	117	10	91.67%
Market	Main	Cabrillo	73	1466	83	10	88.14%
Cabrillo	San Juan	Andalusia	59	1518	86	27	68.79%
Horizon	Speedway	Riviera	87	1800	102	15	85.55%
San Juan	Main	Cabrillo	40	905	51	11	78.23%
Altair	Cabrillo	Windward Ave	35	1077.3	61	26	57.50%
Andalusia	Rialto	Abbot Kinney	19	510	29	10	65.94%
						133	**82.35%**

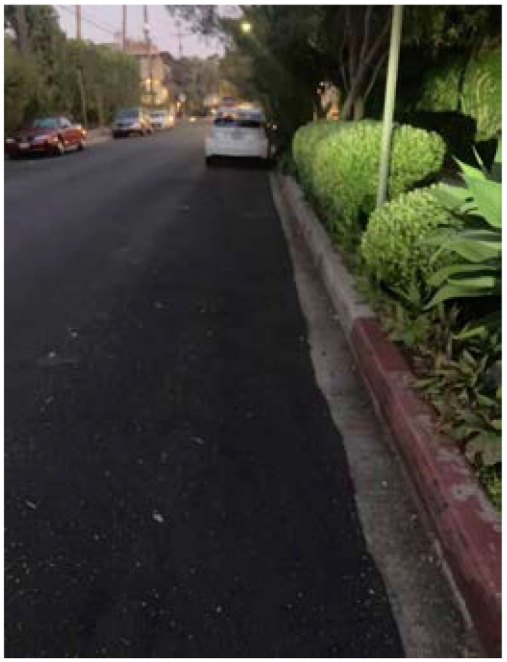
Evening Weekend Parking Utilization Rates

Street Name	From	To	No. of Parked Cars	Total Curb Capacity (No. of Spaces)	Metered?
Main Street	Windward Circle	San Juan	17	18	yes - 2 hr, 8am-8pm
Park Row	Market	Windward	8	8	yes - 1 hr, 8am-6pm
Market	Pacific	Main	5	5	yes - 1 hr, 8am-6pm

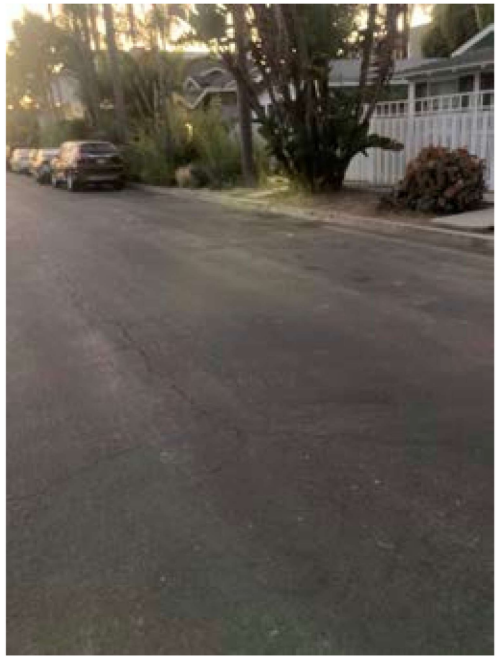
Weekend Evening



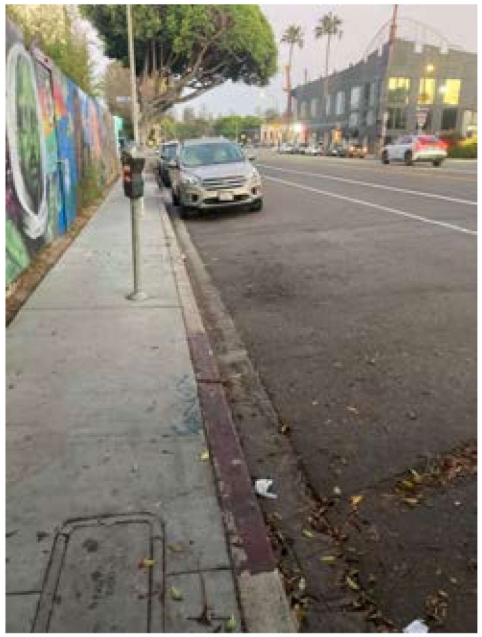
Altair Place



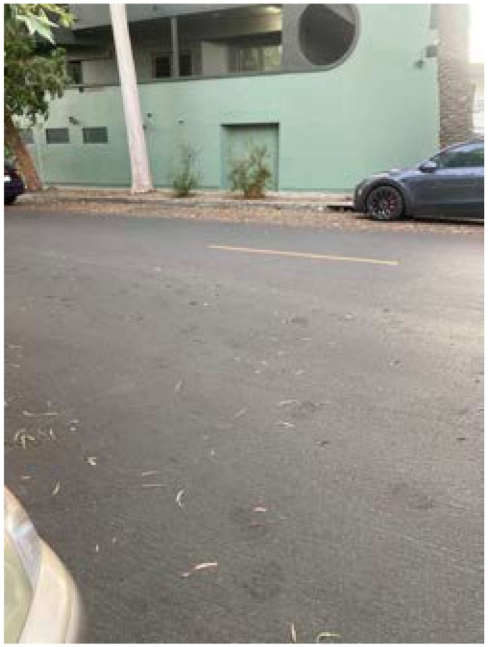
Andalucia Ave



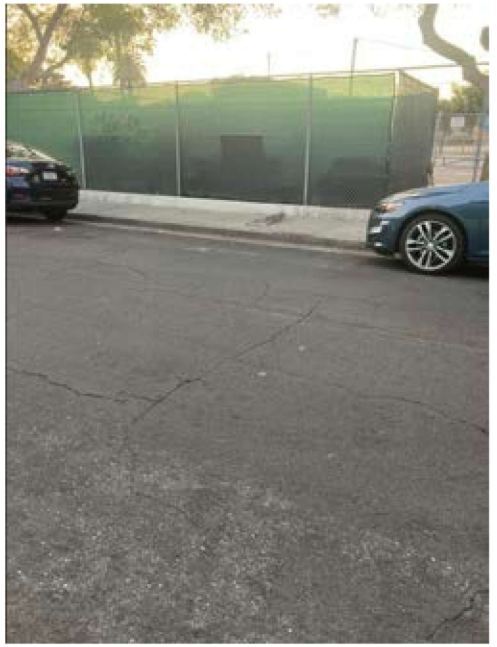
Cabrillo Ave



Main St



San Juan Ave

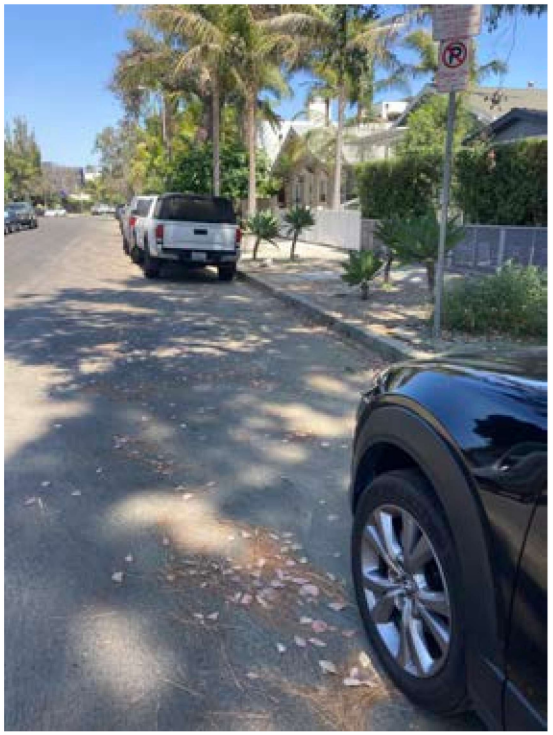


Westminster Ave

Weekend Afternoon



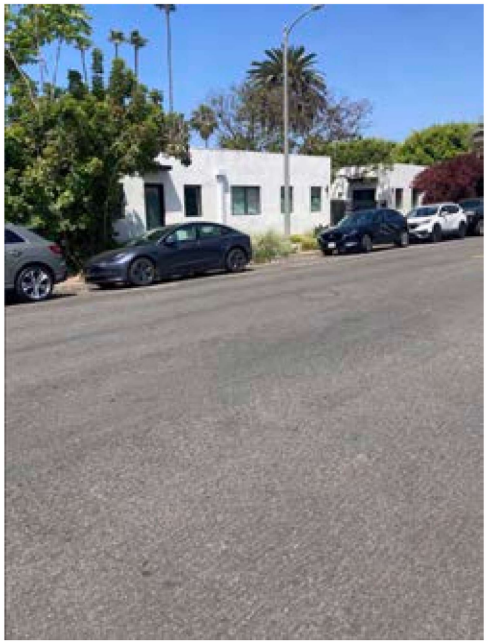
Altair Place



Andalusia Ave

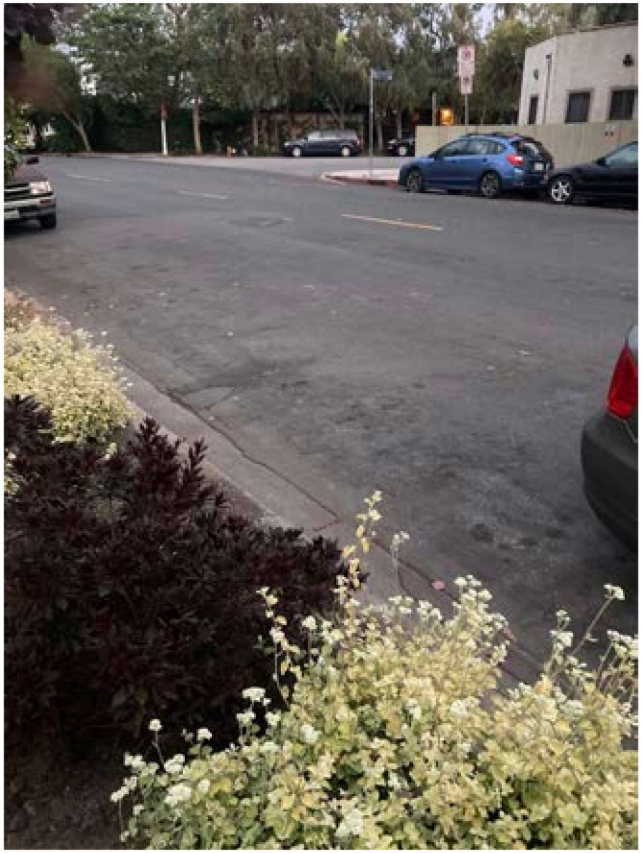


Market St



Windward Ave

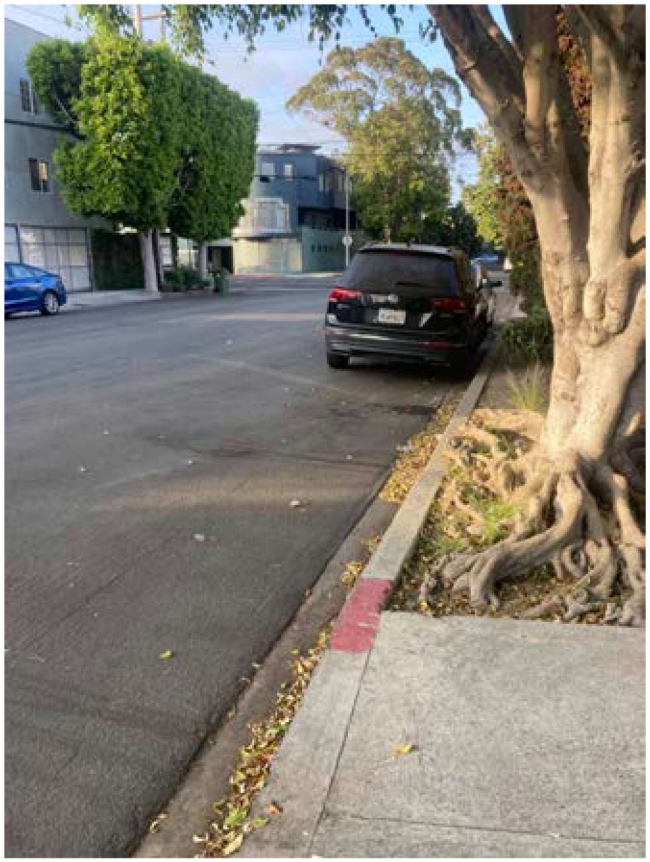
Weekday Evening



Cabrillo Ave



Altair Place



San Juan Ave

Appendix B: Ridy Shared Micromobility Product and Service Information

RIDY

Micromobility as an Amenity

Residential Usage Report - Bay Area - 172 Unit Apartment Building

Creating Happier,



What Residents

"I really like riding your scooters! The app is straightf
and rides really well. I mostly just use it to go to a
there's time I'd like to take it further and explore. The
not to have to drive everywhere, especially
- Jerry G

"This is a great amenity. I absolutely love cruising
Having a dedicated mode of transportation has
Tiffany C

"Having Ridy is great. Any place I want to go

RIDY

Bay Area Apartment Ridership Data

19.5 Miles

Longest Ride

2.6 Miles

Average Ride

Bay Area Apartme
Heatma



RIDY

Trusted by Leading

GREYSTAR™

RELATED

JLL

SUMMERHILL HOMES℠

BOZZUTO

LINCOLN PROPERTY COMPANY

RIDY

Please contact us for additional product details, pricing & lead times.



Danielle Lehner
National Sales:
Hospitality & Residential
danielle.lehner@rideridy.com



Wade Dodson
National Account Manager



CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit E: Historical Resource Assessment

HISTORICAL RESOURCE ASSESSMENT FOR 1422 MAIN STREET, CITY AND COUNTY OF LOS ANGELES, CALIFORNIA

June 2021

PREPARED FOR

Jason Teague
Three on the Tree, LLC
23823 Malibu Road, Suite 50-341
Malibu, CA 90265

PREPARED BY

SWCA Environmental Consultants
51 W. Dayton Street
Pasadena, CA 91105

This page intentionally left blank.

Historical Resource Assessment for 1422 Main Street, City and County of Los Angeles, California

Prepared for

Jason Teague
Three on the Tree, LLC
23823 Malibu Road, Suite 50-341
Malibu, CA 90265

Prepared by

Nelson White, M.S.H.P.

SWCA Environmental Consultants
51 W. Dayton Street
Pasadena, CA 91105
(626) 240-0587
www.swca.com

Contact

Nelson White, M.S.H.P.
Project Manager
nwhite@swca.com

SWCA Project No. 00067562-000-PAS
SWCA CRRD No. 21-327

June 2021

This page intentionally left blank.

EXECUTIVE SUMMARY

Purpose and Scope: Three on the Tree, LLC retained SWCA Environmental Consultants (SWCA) to prepare a Historical Resource Assessment (HRA) for the property (Assessor Parcel No. [APN] 4238-012-005) located at 1422 Main Street, also known as 1418 Main Street (subject property) in the City and County of Los Angeles, California (City). Located on the property is a one-story single-family residence constructed in 1921. Three on the Tree, LLC proposes to demolish and redevelop the subject property. This HRA includes the following: 1) the results of a cultural resource records search and literature review, 2) an intensive-level built environment survey, 3) a site history, and 4) an evaluation to determine if the property is eligible for listing in the National Register of Historic Places (NRHP), listing in the California Register of Historical Resources (CRHR), and/or designation as a Los Angeles Historic-Cultural Monument (HCM), and therefore constitutes a historical resource for the purposes of the California Environmental Quality Act (CEQA). The methodology for this HRA complies with best professional practices as well as the current requirements defined by the City of Los Angeles, Department of City Planning, Office of Historic Resources.[1]

Dates of Investigation: SWCA received results of a California Historical Resources Information System (CHRIS) records search (within a 500-foot radius of the subject property) at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on July 15, 2021. SWCA conducted an intensive-level survey of the subject property on June 10, 2021, and completed archival research in June 2021.

Survey Findings: According to the CHRIS records search, there were two previous cultural resource studies and two previously recorded or evaluated cultural resources within a 500-foot radius of the subject property.

In April 2015 SurveyLA recorded the property as part of the simultaneously identified potential Lost Venice Canals Historic District. Because the property was not visible from the public right-of-way, its contributor status to the district was undetermined. In August 2015 Jenna Snow prepared a HRA including the property and assigned it California Historical Resources Status Code 6Z, meaning it was found ineligible for the NRHP, CRHR, and local designation through survey evaluation.

As part of the current assessment, SWCA utilized two of the SurveyLA historical contexts: 1) Pre-Consolidation Communities of Los Angeles, 1862-1932 Context; Venice, 1901–1925 Theme, Life in Independent Venice Sub-Theme; Residential Single-Family, Bungalow/House Property Type; and 2) Architecture and Engineering, 1850–1980 Context; Arts and Crafts Movement, 1895–1930 Theme, and Craftsman, 1905–1930 Sub-Theme; Residential Single-Family Property Type.

Based on the following investigation and analysis, the rear building at 1422 Main Street is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM. Constructed in 1921 as a single-family dwelling, the subject property is not individually eligible for the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria A/1/1 (Event) as it lacks sufficient integrity to convey a strong visual sense of the overall historic environment of pre-consolidation independent Venice and the Lost Venice Canals Historic District. Research to date did not reveal the property to have an association with significant persons (Criteria B/2/2 - Persons). The property is not individually eligible for the NRHP, the CRHR, or for designation as a Los Angeles HCM under Criteria C/3/3 (Design/Construction) because it lacks sufficient integrity to convey the Craftsman style. Lastly, Criteria D/4 (information potential) is applied most commonly to buildings, structures, or objects that have been

[1] City of Los Angeles Department of City Planning, Office of Historic Resources. July 2017. "Requirements for Phase 1 Historical Resource Assessment Reports."

used as a source of archaeological data and are believed to contain more, as yet unretrieved data; the subject property was not evaluated under these criteria because evaluation under Criteria D/4 is generally conducted by archaeologists, and this report does not include an evaluation under Criteria D/4 for this reason. Furthermore, the property is not a contributor to the Lost Venice Canals Historic District because the numerous alterations have resulted in loss of sufficient integrity to convey the significance of the Lost Venice Canals Historic District.

Disposition of Data: The final HRA and any subsequent related reports will be submitted to Three on the Tree, LLC; copies will be submitted to the SCCIC at California State University, Fullerton, and retained by SWCA's Pasadena, California, office. All field notes, photographs, and records related to the current study are also on file at the SWCA Pasadena office.

This page intentionally left blank.

CONTENTS

EXECUTIVE SUMMARY ..... **I**

I. INTRODUCTION **1**

II. CURRENT HISTORIC STATUS **5**

III. REGULATORY SETTING **5**
FEDERAL REGULATIONS 5
STATE REGULATIONS 6
LOCAL REGULATIONS 7

IV. RESEARCH AND FIELD METHODOLOGY **8**
CULTURAL RESOURCE RECORD SEARCH 9
ADDITIONAL RESEARCH 10

V. ARCHITECTURAL DESCRIPTION **11**

VI. HISTORIC AND NEIGHBORHOOD CONTEXT **15**
VENICE 15
ABBOT KINNEY BOULEVARD 17
VENICE OF AMERICA 19

VII. ARCHITECTURAL TYPE **21**
CRAFTSMAN, 1905–1930 21

VIII. SITE HISTORY **25**

IX. EVALUATION **29**
SURVEYLA 29
NRHP, CRHR, AND HCM ELIGIBILITY 31

X. CONCLUSION **32**

REFERENCES CITED **33**

Figures

Figure 1. Project vicinity map, 1:800,000 scale. 1
Figure 2. Project location on the USGS 7.5-minute quadrangle, ... 3
Figure 3. Project location on 2020 aerial photography, 1:5,000 scale. 4
Figure 4. West (primary) façade, view northeast (SWCA, June 2021) 12
Figure 5. Detail of primary entry, view east (SWCA, June 2021). 12
Figure 6. South façade, view west (SWCA, June 2021). 13
Figure 7. East (rear) façade, view west (SWCA, June 2021) 13

Figure 8. North façade, ... 14
Figure 9. Rear of property, view west (SWCA, June 2021). 14
Figure 10. Venice of America tract, subdivided 1905 (County of Los Angeles, Department of Public Works). Subject property (Lot 5, Block 7) at lower left shaded in gray. 20
Figure 11. 1422 Main Street, as depicted in the 1950 edition of the Sanborn *Fire Insurance Maps of Los Angeles, Venice District* (Sanborn Fire Insurance Map Company 1950; sheet 77). Subject property shaded in gray. 27
Figure 12. Permit for addition, 1951 (LADBS, Permit No. 2282, September 26, 1951). 34
Figure 13. Permit for garage demolition, 1986 (LADBS, Permit No. 64004). 34

Tables

Table 1. Previous cultural resource studies within 500 feet of the subject property. 9
Table 2. Previously recorded resources within 500 feet of the subject property 9
Table 3. Building Permits on File with City of Los Angeles, Department of Building and Safety for 1422 Main Street. 28

Appendices

Appendix A. Resumes of Key Staff
Appendix B. State of California Department of Parks and Recreation Series 523 Forms
Appendix C. Key Building Permits

I. INTRODUCTION

Purpose and Scope: Three on the Tree, LLC retained SWCA Environmental Consultants (SWCA) to prepare a Historical Resource Assessment (HRA) for the property (Assessor Parcel No. [APN] 4238-012-005) located at 1422 Main Street (subject property) in the City and County of Los Angeles, California (City). Located on the property is a one-story single-family residence constructed in 1921. Three on the Tree, LLC proposes to demolish and redevelop the subject property. This HRA includes the following: 1) the results of a cultural resource records search and literature review, 2) an intensive-level built environment survey, 3) a site history, and 4) an evaluation to determine if the property is eligible for listing in the National Register of Historic Places (NRHP), listing in the California Register of Historical Resources (CRHR), and/or designation as a Los Angeles Historic-Cultural Monument (HCM), and therefore constitutes a historical resource for the purposes of the California Environmental Quality Act (CEQA). The methodology for this HRA complies with best professional practices as well as the current requirements defined by the City of Los Angeles, Department of City Planning, Office of Historic Resources.[2]

SWCA Architectural Historian Nelson White conducted the evaluation and authored this assessment. SWCA Assistant Architectural Historian Millie Mujica conducted a built environment survey of the subject property. Mr. White has a master's degree in Historic Preservation and Ms. Mujica has a master's degree in Architectural History. SWCA Senior Architectural Historian Joseph Tomberlin, who has a master's degree in Historic Preservation, provided quality assurance/quality control. All three meet and exceed the Secretary of the Interior's Professional Qualifications Standards (PQS) for Architectural History. Resumes of key staff follow this report as Appendix A.

PROPERTY LOCATION

The subject property is located in the Venice section of the City and County of Los Angeles, California (Figures 1 through 3). The property occupies a rectangular 0.015-acre parcel on the east side of Main Street, between Horizon Avenue to the north and Market Street to the south. The parcel consists of Lot 5, Block 7, in the Venice of America Tract. Although the Los Angeles County Assessor has the property recorded as 1422 Main Street, the residence's address numbers read as 1418 Main Street.

[2] City of Los Angeles Department of City Planning, Office of Historic Resources. July 2017. "Requirements for Phase 1 Historical Resource Assessment Reports."



Figure 1. Project vicinity map, 1:800,000 scale.

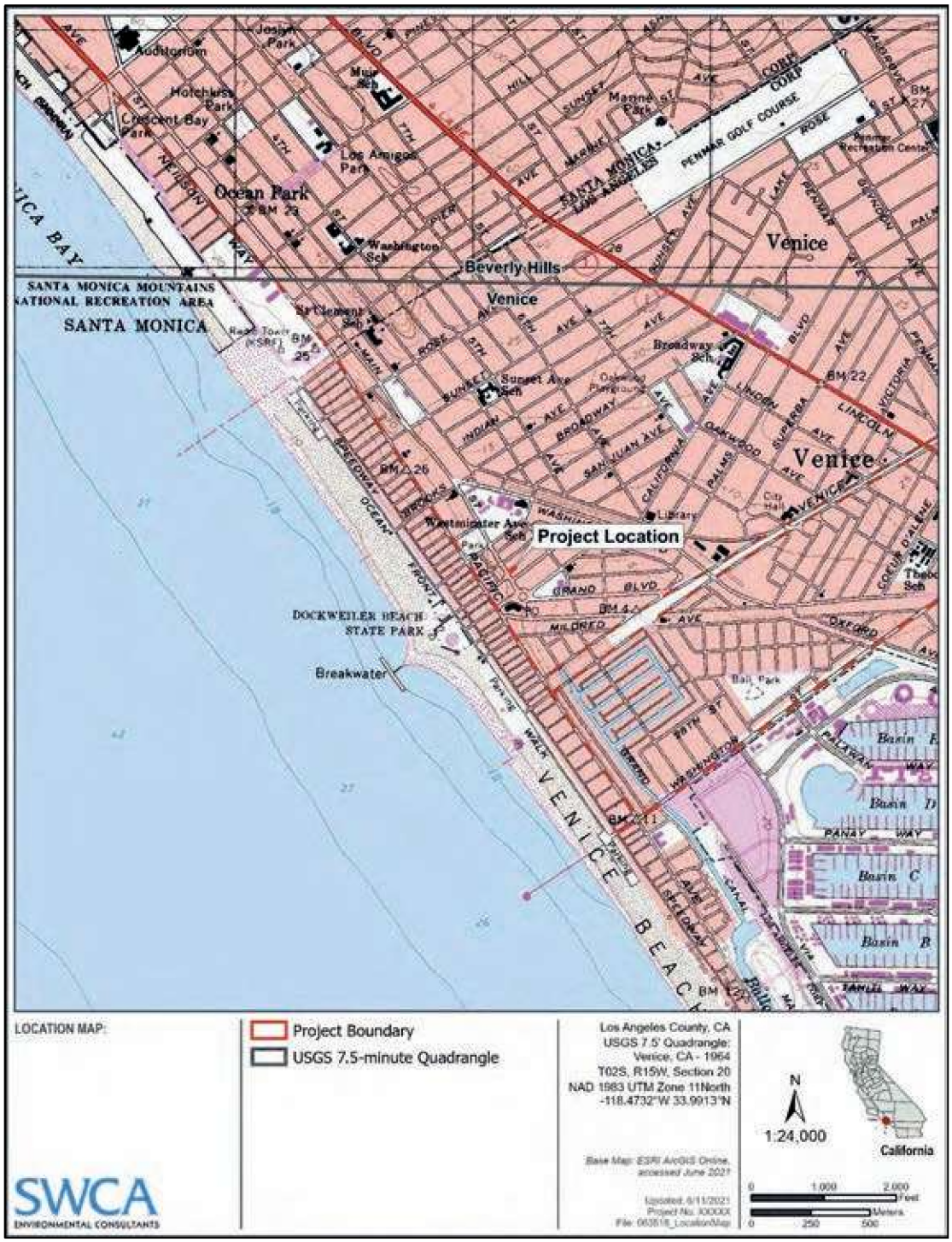


Figure 2. Project location on the USGS 7.5-minute quadrangle, Venice, California.

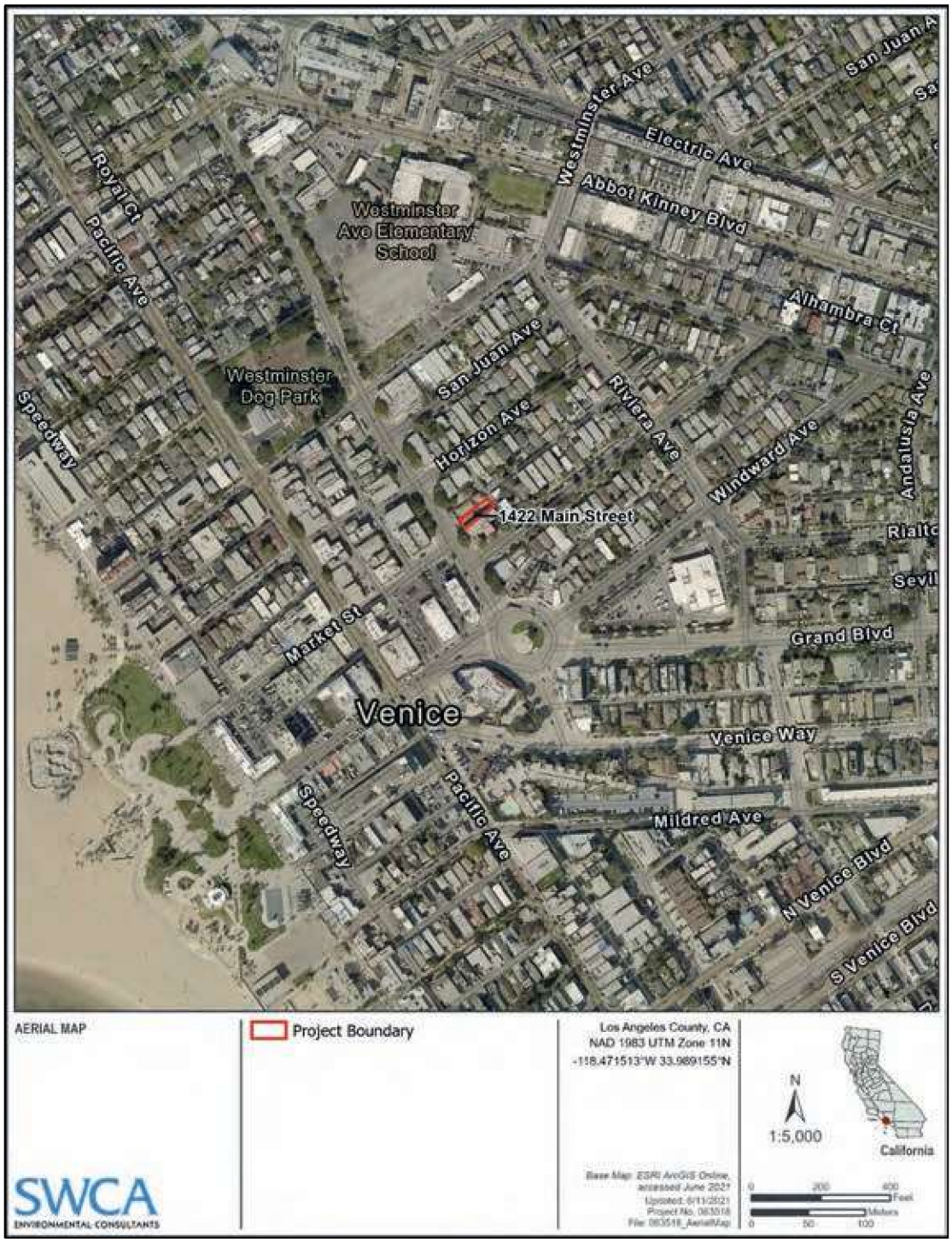


Figure 3. Project location on 2020 aerial photography, 1:5,000 scale.

II. CURRENT HISTORIC STATUS

The subject property at 1422 Main Street is not listed individually in the NRHP, CRHR, nor designated as a Los Angeles HCM. The property is not located within a designated Historic Preservation Overlay Zone (HPOZ).

The property is located within the geographic area covered by the *Historic Resources Survey Report: Venice Community Plan Area* (CPA), which was completed on behalf of the City of Los Angeles OHR for SurveyLA.[3] The Survey Report was prepared by Historic Resources Group (HRG) and was conducted between November 2013 and February 2014. The property is located within the identified Lost Venice Canals Historic District, which SurveyLA identified in 2015. The district was identified as eligible for federal, state, and local listing under Criteria A/1/1 as "a unique example of early-20th century residential development oriented around the original Venice canals developed by Venice of America founder Abbot Kinney," with a period of significance from 1904-1929.[4] At the time, the subject property was not visible from the public right-of-way and therefore its contributor status was undetermined.

In August 2015 Jenna Snow surveyed and evaluated the subject property in her report *Historic Resource Assessment: 202 E. Horizon Avenue, 208 E. Horizon Avenue, 1414 Main Street, 1422 Main Street, Los Angeles, CA* (2015 HRA). The 2015 HRA assigned the property California Historical Resources Status Code 6Z, meaning it was "found ineligible for the NRHP, the CRHR, and for local designation through survey evaluation." It determined that although the property was built during the period of significance, it did not possess sufficient integrity to convey the significance of the identified district.

The California Historical Resources Information System (CHRIS) records search indicated that prior to SurveyLA, the property had not been recorded and evaluated.

III. REGULATORY SETTING

This section discusses the applicable federal, state, and local laws, ordinances, regulations, and standards informing the identification of eligible historical resources.

Federal Regulations

NATIONAL REGISTER OF HISTORIC PLACES (NRHP)

The NRHP was established by the National Historic Preservation Act of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 Code of Federal Regulations [CFR] 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

[3] Historic Resources Group, *Historic Resources Survey Report: Venice Community Plan Area* (Prepared for SurveyLA, City of Los Angeles, Department of City Planning, Office of Historic Resources, March 2015).

[4] Historic Resources Group, *Venice Report: Historic Districts and Multi-Property Resources.* (Prepared for SurveyLA, City of Los Angeles, Department of City Planning, Office of Historic Resources, April 2015), 3.

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: It is associated with the lives of persons who are significant in our past;
- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting these criteria, a property must retain historic integrity, which is defined in National Register Bulletin 15 as the "ability of a property to convey its significance."[5] In order to assess integrity, the National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities:

1. Location – the place where the historic property was constructed or the place where the historic event occurred;
2. Design – the combination of elements that create the form, plan, space, structure, and style of a property;
3. Setting – the physical environment of a historic property;
4. Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
5. Workmanship – the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
6. Feeling – a property's expression of the aesthetic or historic sense of a particular period of time; and
7. Association – the direct link between an important historic event or person and a historic property.

State Regulations

CALIFORNIA REGISTER OF HISTORICAL RESOURCES (CRHR)

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change."[6] Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district,

[5] National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: National Park Service, 2002).

[6] Public Resources Code, Sections 21083.2 and 21084.1.

may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.[7]

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR.

Local Regulations

LOS ANGELES HISTORIC-CULTURAL MONUMENTS (HCM)

Local landmarks in the City of Los Angeles are known as HCMs and are under the aegis of the City of Los Angeles, Department of City Planning, Office of Historic Resources (OHR). An HCM, monument, or local landmark is defined in the Cultural Heritage Ordinance as follows:

> [A] Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.[8]

HISTORIC PRESERVATION OVERLAY ZONES (HPOZ)

As described by the OHR, "to identify and protect neighborhoods with distinct architectural and cultural resources, the City…developed an expansive program of Historic Preservation Overlay Zones.... HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties within designated districts." The HPOZ Ordinance was adopted in 1979 and amended in 2004. With regard to HPOZ eligibility, City of Los Angeles Ordinance No. 175891 states that features designated as contributing shall meet one or more of the following criteria:

[7] Public Resources Code, Section 15024.1(c).

[8] Los Angeles Municipal Code, Section 22.171.7 (Added by Ordinance No. 178,402. Effective 4/2/07).

- adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses Historic integrity reflecting its character at that time; or

- owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or

- retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of an Historic place or area of Historic interest in the City.[9]

Regarding effects on federal and locally significant properties, the Los Angeles Municipal Code declares the following:

> The department shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.[10]

SURVEYLA, CITY OF LOS ANGELES, DEPARTMENT OF CITY PLANNING, OFFICE OF HISTORIC RESOURCES (OHR)

SurveyLA is a citywide survey of Los Angeles overseen by the OHR. Conducted between 2010 and 2017, field surveys were completed in three phases by Community Plan Area, incorporating over 880,000 legal parcels and nearly 500 square miles. SurveyLA staff, volunteers, and consultant teams developed multiple-property documentation-driven historic context statements for themes and property types throughout Los Angeles. These themes include architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, and entertainment, among others. These contexts define associated themes, property types, eligibility standards, character-defining features, and integrity considerations to be used when evaluating properties.

IV. RESEARCH AND FIELD METHODOLOGY

This evaluation was conducted and completed in accordance with the practices described in the Secretary of the Interior's *Standards and Guidelines for Historic Preservation*, including standards for planning, identifying, evaluating, and documenting resources. In addition, this report was prepared according to the requirements of the OHR for historical resource assessments. Applicable federal, state, and local level

[9] Los Angeles Municipal Code, Section 12.20.3.

[10] Los Angeles Municipal Code, Section 91.106.4.5 (Permits for Historical and Cultural Monuments).

criteria were considered, as well as the context-driven methods and framework used by SurveyLA documentation efforts.

Cultural Resource Record Search

SWCA received results of a California Historical Resources Information System (CHRIS) records search (within a 500-foot radius of the subject property) at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on July 15, 2021. In addition to official maps and records, the following sources of information were consulted as part of the records search:

- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California State Historical Landmarks
- California Points of Historical Interest
- California Historic Resources Inventory (HRI)
- City of Los Angeles Historic-Cultural Monuments (HCMs)

PREVIOUSLY CONDUCTED CULTURAL RESOURCE STUDIES

The CHRIS records search identified two cultural resource studies that had been previously conducted within a 500-foot radius of the subject property (Table 1).

Table 1. Previous cultural resource studies within 500 feet of the subject property.

SCCIC Report Number	Title of Study	Author	Year	Proximity to Project Area
LA-05554	*Neighborhood History and Archaeological Predictions*	Wible, Leith	1999	Outside
LA-12989	*Survey LA, Los Angeles Historic Resources Survey: Historic Resources Survey Report Venice Community Plan Area*	Historic Resources Group	2015	Inside

PREVIOUSLY RECORDED RESOURCES

The CHRIS records search identified two cultural resources within a 500-foot radius of the subject property that had been previously recorded or evaluated (Table 2).

Table 2. Previously recorded resources within 500 feet of the subject property.

Primary No.	Trinomial	Resource Type	Resource Description	Year Recorded (Recorder)	Proximity to Project Area
P-19-188169		Building	AT&T Telecommunications Facility #950-031-009A – 1512-1518 Pacific Ave, Venice 90291	2005 (K.A. Crawford)	Outside
P-19-188171		Building	Peoples Drug Store, Melton Bldg, Windward Apts – 75 Windward Ave at 1515 Pacific Ave, Venice 90291	2005 (K.A. Crawford)	Outside

Additional Research

SWCA performed further property and neighborhood-specific research to confirm and/or inform building construction dates of the subject property and characterize the historical development of the surrounding area. In addition to reviewing building permits on file with the City of Los Angeles, Department of Building and Safety, SWCA conducted independent research into historical city directories and U.S. Census records from 1930 and 1940. However, unknown changes in street and canal names and addresses precluded verifiable identification of early property owners and/occupants. SWCA also consulted the following digital archives and organizations to identify relevant historic photographs, newspaper articles, city directories, and maps:

- Ancestry.com
- Los Angeles Public Library
- ProQuest
- Sanborn fire insurance maps

As part of the HRA, Ms. Mujica conducted a built environment survey of the subject property on June 10, 2021. The purpose of the survey was to identify and photograph the subject property and to inform its historical significance evaluation. The field survey consisted of a visual inspection of the existing building and any associated features. The building was recorded on California Department of Parks and Recreation (DPR) 523 series forms, which are included in Appendix B of this report. Ms. Mujica also performed a reconnaissance survey of the surrounding area to determine the potential for any historic districts and to identify other similar property types. All field notes, photographs, and records related to the current study are on file at the SWCA Pasadena office.

V. ARCHITECTURAL DESCRIPTION

The following presents a description of the property; this material is excerpted from the 2015 HRA, completed by Jenna Snow in August 2015. SWCA conducted its own survey on June 10, 2021, to observe the property's current condition (Figures 4 through 9).

> 1422 Main Street is a one story, single family house designed in a Craftsman style and located mid-block on Main Street. It is not visible from the street due to the high, wood, fence along the sidewalk line. A shallow yard, at the same elevation as the sidewalk, between the front, west elevation and fence is paved in concrete. A modified rectangle in plan, the exterior is finished in rough textured stucco siding with some areas of board and batten siding at the main, west façade. The front gable roof has wide, overhanging eaves. Fenestration generally consists of single, vinyl and aluminum, vertical sliding sash.
>
> The main, west façade faces Main Street (Figures 4-5). A low brick wall, topped by a metal security fence, defines a porch area. The porch steps slightly out from the plane of the elevation and has a separate front gable roof with a pierced fascia. The main entrance is defined by a sliding glass and aluminum door. A secondary entrance, consisting of a glass and aluminum hinged door, is placed north of the main entrance along the west façade within a small portion of wall finished in wood, board and batten siding. A contemporary, aluminum, horizontal, sliding window is placed adjacent to the secondary entrance.
>
> The south elevation is built very close to the south property line with the center of the elevation stepped out (Figure 6). The rear, east elevation contains a single, contemporary, wood door with glass lights in the south side of elevation (Figure 7). An older, non-functional, wood door with three lights and a sidelight bump out from the center of the elevation. The north elevation is not accessible (Figure 9).
>
> *Interior*
> Interior finishes have been altered over time. The living/dining room dominates the interior along south side of house and features exposed ceiling beams.

As exhibited in the following photos, the west (primary) façade has changed since the 2015 HRA. SWCA observed that the recessed porch remains but the security fence has been removed. Within the porch a new metal-framed sliding door has been installed. To the south of the porch a new stucco-clad façade panel has been installed that rises above the roof line. Above the gable roof new polished metal panels have been installed, forming a new downward slope from north to south. On the addition to the north, two new narrow stucco-clad façade panels have been installed that also rise above the roof line. The small sliding window remains and the door has been replaced with a commercial-type metal-framed glass door. In between the two stucco panels are more metal accent panels.



Figure 4. West (primary) façade, view northeast (SWCA, June 2021).



Figure 5. Detail of primary entry, view east (SWCA, June 2021).



Figure 6. South façade, view west (SWCA, June 2021).



Figure 7. East (rear) façade, view west (SWCA, June 2021).



Figure 8. North façade, view west (SWCA, June 2021).

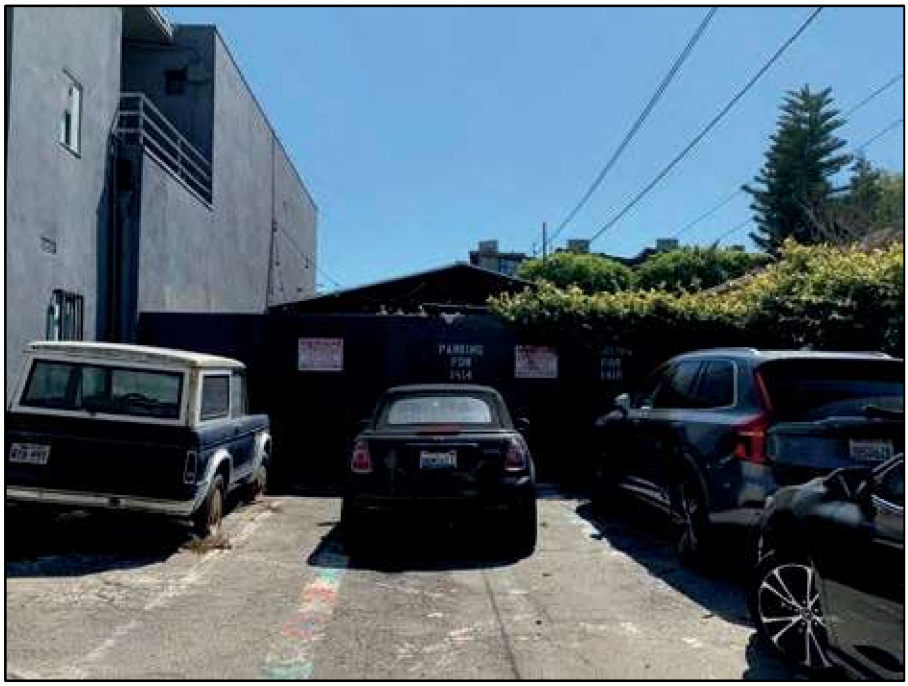


Figure 9. Rear of property, view west (SWCA, June 2021).

VI. HISTORIC AND NEIGHBORHOOD CONTEXT

Venice

The subject project is located in the neighborhood of Venice within the City of Los Angeles on the border of Culver City and Santa Monica. In the early nineteenth century, the land began to be used for cattle grazing by the Machado family. Augustin Machado and his wife immigrated to Los Angeles from Sonora in 1781 and were the first family to settle in the Ballona area in 1819.[11] The Machado family had sole rights to the area until 1839, when Augustin Machado partnered with brothers Felipe and Tomas Talamantes.[12] The Machado and Talamantes families stocked Rancho La Ballona with cattle, planted vineyards and other crops, and built houses on the land. It is reported that Native Americans who lived near the Machado adobe and near present-day Loyola University supplied much of the labor for these projects.[13]

The Mexican-American War and an influx of new people brought many changes to the ranchos of Los Angeles, including Rancho La Ballona. As the population of the greater Los Angeles area rapidly expanded, the price of beef rose dramatically, and crime increased throughout the area.[14] The change in government also led to logistical problems for rancho owners who were forced to engage in difficult and lengthy legal processes in order to re-secure the title of their land under American authorities. All of these issues, coupled with a floundering cattle business, forced many rancho owners to sell off their land by the late nineteenth and early twentieth centuries.[15] In 1874 the Machado family sold most of the 861 acres of their land south of Pico Boulevard and east of the Pacific Ocean to Nancy Lucas, a widow. The land stayed in Lucas' hands until she died in 1881, after which it was passed on to her heirs.

The first major development project in the Ballona area was an attempt by the Santa Fe Railroad to build a harbor. Work began in 1887 with the construction of a railroad, the dredging of the wetland, and the construction of two wharfs.[16] This investment in infrastructure led to the birth of several towns in the area; however, the initial venture was a failure, the town and port were never built, and dredging was halted because of its impracticality.[17] This episode represents the beginning of the end for the Ballona wetlands, which were decimated by further development in the area during the end of the nineteenth and the beginning of the twentieth centuries.

As the area became more popular among tourists, one well-to-do tobacco tycoon turned developer saw a golden opportunity to create a lucrative beach resort town. Originally from New Jersey, Abbot Kinney made his wealth working in his older brother's tobacco company. In 1880 he decided to relocate to Southern California, where he became interested in land development.[18] After a failure in Pacific Palisades, Kinney and his partner bought Ocean Park Casino and the surrounding tract of land in 1891. Most of Ocean Park,

[11] Clementia Marie, "The First Families of La Ballona Valley." *The Historical Society of Southern California Quarterly*. 37, no. 1 (1955), 52.

[12] Paula A. Scott, *Santa Monica: A History on the Edge* (Mt. Pleasant, SC: Arcadia Publishing, 2004), 27.

[13] Marie, 53.

[14] Scott, 32.

[15] Scott, 34.

[16] Brian D. Dillon, Archaeological Impact Assessment of the Price-Costco Plaza Project 18.4 +/- Acres in Culver City, Los Angeles County, California. Prepared for Christopher A. Joseph & Associates, on file at the Southern Central Coastal Information Center, 1996, 28.

[17] Fred E. Basten, *Santa Monica Bay: The First 100 Years: a pictorial history of Santa Monica, Venice, Ocean Park, Pacific Palisades, Topanga, & Malibu* (Los Angeles: General Publishing Group, 1974), 12; Dillon, 28.

[18] Tom Moran, "In Kinney's Own Words." www.veniceofamerica.org/pdf/mar_apr_2004_newsletter.pdf. Also, Rob Sullivan, "An Intimate Look at History." *Los Angeles Times*. October 7, 1990.

as it came to be known, was subdivided into part of the Golden Bay tract which was recorded in 1902.[19] The Golden Bay tract was developed with a unique layout that included separate streets dedicated for automobile and pedestrian use. This development method resulted in a parallel plan of "drive streets," "walk streets," and alleys or "courts." Many subdivisions of Venice that were developed by Kinney exhibit this plan; however, the walk streets in northern Venice are likely the earliest examples of its implementation. The plan has been described as an effort on the part of the developers to cut costs, but they also resulted in a courtyard effect for the small lots and provided children a safe place to play.[20]

Eventually Kinney and his partners dissolved their property, with Kinney maintaining ownership of the undeveloped southern half, which included present-day Venice. With this land, Kinney decided to build Venice of America, a re-creation of Venice, Italy, complete with dredged canals, a Venetian-style business district, and an auditorium.[21] In 1990, West Washington Boulevard between Main Street and Washington Street was renamed Abbot Kinney Boulevard in his honor.[22]

The introduction of the Pacific Electric streetcar allowed easier access to Venice of America, resulting in increased tourism in the area.[23] The Pacific Electric car ran along Venice Boulevard and was known as the "Venice Short Line." This section, constructed in 1897 by the Pasadena & Pacific Railway Company and later taken over by Pacific Electric in 1911, was the most used beach line within the Los Angeles metro system at the time.[24] Despite the success of the rail line, Kinney's Venice of America was on a downward spiral. In 1912 the California State Board of Health condemned Kinney's beloved canals as a health hazard and Kinney was forced to deed them to the City of Venice, who could provide better maintenance; however, by the 1920s the canals had become no more than public nuisance. In 1924, the City of Venice decided to adapt the canal system to better fit modern transportation infrastructure, filling them and converting them to roadways. Though residents fought the plan for several years, during which time Venice was annexed by the City of Los Angeles, the canals were paved in 1929.[25]

Kinney's death in 1920, coupled with the beginning of Prohibition, were the final nails in the coffin for incorporation of the small resort town. Political infighting within Venice's government for so many years had grated on the residents. This climate, coupled with the deteriorating state of public infrastructure, ultimately led the city trustees to call for a special annexation election on October 2, 1925. The final tally was 3,130 in favor of incorporation and 2,215 opposed, with some historians theorizing the vote was a result of resident's displeasure with the inept government.[26] The consolidation with the City of Los Angeles in 1925 resulted in many improvements in city services as well as the construction of many prominent buildings such as Venice High School.[27]

Even as urbanization continued into the 1920s, development was concentrated in relatively discrete areas along Lincoln Boulevard, primarily to the south, and along Venice Boulevard and the Pacific Electric route,

---

[19] Historic Resources Group. *Historic Resources Survey Report: Venice Community Plan Area*. Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources, March 2015. Also, Jeffrey Stanton, *Venice California: "Coney Island of the Pacific"* (Los Angeles: Donahue Publishing, 1993), 9.

[20] *Ibid.*

[21] Helaine Olen, Break on Through, Abbot Kinney: Venice, California. *The Baffler*, 2014, 158. Also, Tom Moran, "In Kinney's Own Words." Available at: www.veniceofamerica.org/pdf/mar_apr_2004_newsletter.pdf. Accessed February 1, 2018,

[22] Lisbet Nilson, "A Venice Street Is Named for a Visionary," *Los Angeles Times*, October 7, 1990.

[23] Friends of the Ballona Wetlands, "Early History." Available at: http://www.ballonafriends.org/history.html#7. Accessed February 1, 2018,

[24] Electric Railway Historical Association (ERHA) of Southern California, "Venice Short Line." Available at: http://www.erha.org/pewvs.htm. Accessed February 1, 2018,

[25] Historic Resources Group, 13.

[26] Stanton, 134.

[27] Historic Resources Group, 14; Olen, 159; Stanton, 143.

primarily to the west. The northern half of Venice was still characterized by agricultural plots, once part of grazing lands within the historic Rancho La Ballona. Historical aerial photographs show the agricultural fields and open lots in the northern half of Venice standing in stark contrast to encroaching developments. The land use and partitioning pattern established in the 1920s persisted in its basic form into the 1930s, as depicted in aerial photographs and survey maps created by the Works Progress Administration.

The 1920s brought a new type of development to the area through the growth of the aviation industry.[28] The area where the Santa Monica Airport is now located, just north of Venice, was used as a landing strip as early as 1917. Though at this early time the runway and landing strip was only a grassy flat area, an official airport was commissioned by the Army in 1922 and named Clover Field in honor of an American pilot killed in World War I.[29] The area came under ownership of the City of Santa Monica in 1927 and was then renamed Santa Monica Airport.[30] One of the major companies in the aeronautics field at the time was Douglas Aircraft Company, which operated out of Santa Monica Airport. Douglas Aircraft became known world-wide when its World Cruiser biplane became the first aircraft to successfully circumnavigate the globe in the 1920s.

World War II and the growth of the aeronautics industry resulted in a population boom in Venice and surrounding neighborhoods including West L.A., Culver City, and Santa Monica. The war brought a new urgency to the aerospace industry, exemplified by the growth of Douglas Aircraft and its intense schedule. During these years the company employed 44,000 people in three shifts 24 hours a day, seven days a week. Housing for all the employees became a necessity, resulting in a massive investment in single-family residential homes in the area surrounding the airport.[31]

By the end of the war, Santa Monica, Culver City, Palms, and adjacent areas were bustling blue-collar neighborhoods and Lincoln Boulevard, Venice Boulevard, and Washington Boulevard had become main thoroughfares. By 1964 all of the former agricultural lands had been converted into housing tracts or recreational facilities, the latter of which includes the Penmar Golf Course and Park.

Abbot Kinney Boulevard

Abbot Kinney Boulevard was so named in 1990. It was originally known as Lake Street and then sometime before 1918 the name was changed to Washington Boulevard.[32] The development of the street was, like much of Venice, greatly influenced by the many rail lines and spurs that physically divided the city into sections.[33] Present-day Abbott Kinney Boulevard ran immediately south of the Inglewood Line which followed present-day South Irving Tabor Court and Electric Avenue. The Inglewood Line was built in 1892 primarily as a freight-hauling steam railroad before eventually being electrified for service as an interurban passenger railroad. [34] In addition to the Inglewood Line, Abbot Kinney Boulevard was also served by the Venice Miniature Railway, a passenger-carrying narrow-gauge steam railway commissioned by Abbot

[28] Friends of the Ballona Wetlands 2017; Nathan Masters, "CityDig: When Santa Monica Airport Was Clover Field." *Los Angeles Magazine*, 2014. Available at: http://www.lamag.com/citythinkblog/citydig-when-santa-monica-airport-was-clover-field/. Accessed February 1, 2018

[29] Masters.

[30] *Ibid.*

[31] City of Santa Monica, "Rich in Aviation History and Heritage." Available at: https://www.smgov.net/Departments/Airport/Airport_History.aspx. Accessed February 1, 2018.

[32] Daniel Prosser, *Los Angeles Citywide Historic Context Statement; Context: Pre-Consolidation Communities of Los Angeles, 1862-1932* (Prepared for: City of Los Angeles, Department of City Planning, Office of Historic Resources, July 2016), 174; Sanborn Map Company, *Sanborn Fire Insurance Maps: Los Angeles, Venice District* (1918), sheets 76, 77, 81, 82, 84, 89, 90; Nancy Hill-Holtzman, "Part of Washington Blvd. to Be Renamed," *Los Angeles Times*, February 25, 1990; Nilson.

[33] Prosser, 153.

[34] Prosser, 151.

Kinney. The railway, which operated from 1905 to 1924, ran in a loop between Abbot Kinney Boulevard and the Grand Basin at Windward Avenue.[35]

The 1918 Sanborn *Insurance Maps: Los Angeles, Venice District*, the earliest to record the section of Abbot Kinney Boulevard between Brooks Avenue and Venice Boulevard, reveal relatively sparse development. Even though Venice was over a decade old, roughly two-thirds of the lots on the street remained vacant. Of those lots that had been developed, the majority were single-family dwellings, with considerably fewer multi-family dwellings and commercial buildings.[36] The most substantial edifice along the street was the Venice Grammar school on the site of the present-day Westminster Avenue Elementary School.

During this building boom after World War I Abbot Kinney Boulevard began to shift from a primarily residential district to a more mixed character "with modest Craftsman cottages from the teens and 1920s alongside one- to three-story vernacular brick buildings from the 1920s."[37] During these years, the street became "the general purpose business district that Venice had previously lacked."[38] SurveyLA calls out the 1923 Bundy Building at 1327-1335 Abbot Kinney Boulevard as "a particularly elegant example" of this era of the street's commercial development.[39]

From the beginning of the city's development, Abbot Kinney Boulevard and the Inglewood Line divided the primarily white neighborhood of Venice of America to the south from the neighborhood of Oakwood to the north, where blacks were permitted to live. Washington Boulevard served as such a hard racial barrier that when Abbott Kinney died in 1920 and willed his home on the Grand Canal to his personal chauffeur, Irving Tabor, Tabor had to move the house to Oakwood in order to live in it.[40] One African American resident, James Thomas, who lived in Oakwood from the 1930s to the 2000s recalled, "…you didn't cross Washington. Never! We just knew we were outside of where we was supposed to be."[41]

The 1940 WPA Land Use Survey of Abbot Kinney Boulevard, between Venice Avenue and Brooks Avenue, revealed the effects of these early boom years. While the number of single-family dwellings along the street stayed relatively constant between 1918 and 1940, the number of multi-family dwellings rose from 4 to 23. Even more spectacular was the growth of commercial buildings, which rose from only 6 in 1918 to 50 in 1940. Unsurprisingly, the number of vacant lots decreased substantially over the same period.[42]

Unfortunately, many of the 1950 Sanborn maps for the street are unavailable; however, the small surviving section covering three blocks along the north side of the street between Venice Boulevard and California Avenue suggests that the patterns seen in 1940 continued through the following decade. The most marked change in this small section of the neighborhood was in commercial development, which grew from only 1 building in 1918, to 12 in 1940, and to 17 in 1950. Meanwhile, the number of single-family dwellings inthe small sample area, which had nearly tripled between 1918 and 1940, remained effectively unchanged between 1940 and 1950.[43]

By the 1950s, the older residential quality of the street had fully given way to a neighborhood-serving commercial character. About the commercial character of the street, the *Historic Resources Survey Report:*

[35] Historic Resources Group, 9.

[36] Sanborn (1918), sheets 76, 77, 81, 82, 84, 89, 90.

[37] Historic Resources Group, 28, 46.

[38] Prosser, 167-168.

[39] Prosser, 168.

[40] Andrew Deener, "The 'Black Section' of the Neighborhood: Collective Visibility and Collective Invisibility as Sources of Place Identity," *Ethnography: Its Traditions and Its Future* 11, no. 1 (March 2010): 49-50.

[41] Deener, 50.

[42] Sanborn (1918), sheets 76, 77, 81, 82, 84, 89, 90; City of Los Angeles, Department of City Planning, *WPA Land Use Survey Map for the City of Los Angeles* (1940).

[43] Sanborn (1918), sheets 89, 90; Sanborn Map Company, *Sanborn Fire Insurance Maps: Los Angeles, Venice District* (1950), sheets 89, 90; City of Los Angeles, Department of City Planning (1940).

Venice Community Plan Area says: "Primarily serving the African-American residents of nearby Oakwood, offerings included a beauty salon, markets, repair shops, artist studios, wholesale businesses, and secondhand thrift stores. The diversity of operations was due in part to the economic limitations of the surrounding community; 'merchants had a difficult time surviving solely from retail sales. Many stores on the street were a mixture of wholesale and retail, and others provided a range of services to increase their profits and consumer base.' "[44] The limited economic desirability of the neighborhood also made the area attractive to artists. Among the most famous of those who set up shop along West Washington were the designers Charles and Ray Eames, who, from 1943 to 1988, kept their studio in the former Bay Cities Garage at present-day 901 Abbot Kinney Boulevard.

By 1990, the *Los Angeles Times* described the street as having "contained an eclectic mix of artists' studios, funky boutiques, antique stores, restaurants and residences."[45] A more recent news article in the *Times* describes the street in the 1980s as being marked by an uneasy mixture of "struggling artists" and gang violence.[46] The street was renamed Abbot Kinney Boulevard in 1990, in part to reduce the confusion of the multiple streets named "Washington" in the immediate area, and because of the efforts of the Abbot Kinney Boulevard Merchants Association.[47] Most recently the street has experienced large amounts of commercial development as it has become a magnet for high-end fashion, dining, and retail, all part of a larger trend of socio-economic change in Venice that many scholars and neighborhood activists have called "gentrification."[48]

Venice of America

The subject property is legally defined as Lot 5 of Block 7 in the Venice of America tract. The tract was subdivided in 1905 by the Abbot Kinney Company (Figure 10). The irregularly shaped tract was roughly bounded on the west by the Pacific Ocean, on the east by the Los Angeles Pacific Railroad right-of-way, on the north by Westminster Avenue, and on the south by Mildred Avenue and the Los Angeles Pacific Railroad right-of-way. There were 24 blocks and approximately 617 lots, with additional lots not to be dedicated. Most lots were rectangular. Lot size varied in shape and size. The typical size lot was 30 feet wide by 95 feet deep. Arguably chief among its characteristics was the network of six canals (now filled in). The 1918 Sanborn *Insurance Maps of Santa Monica, Including Venice*, the earliest available to record the tract, illustrates sparse development throughout. Historical aerial images reveal that by 1928, the majority of the tract had been developed. By 1963 the Venice of America tract was heavily developed and by 1977 roads appear to have replaced rail lines.

[44] Historic Resources Group, 16.
[45] Hill-Holtzman, 1990.
[46] Martha Groves, "Abbot Kinney Boulevard's Renaissance a Mixed Blessing," *Los Angeles Times*, October 25, 2013.
[47] Hill-Holtzman, 1990.
[48] Olen, 156-163.

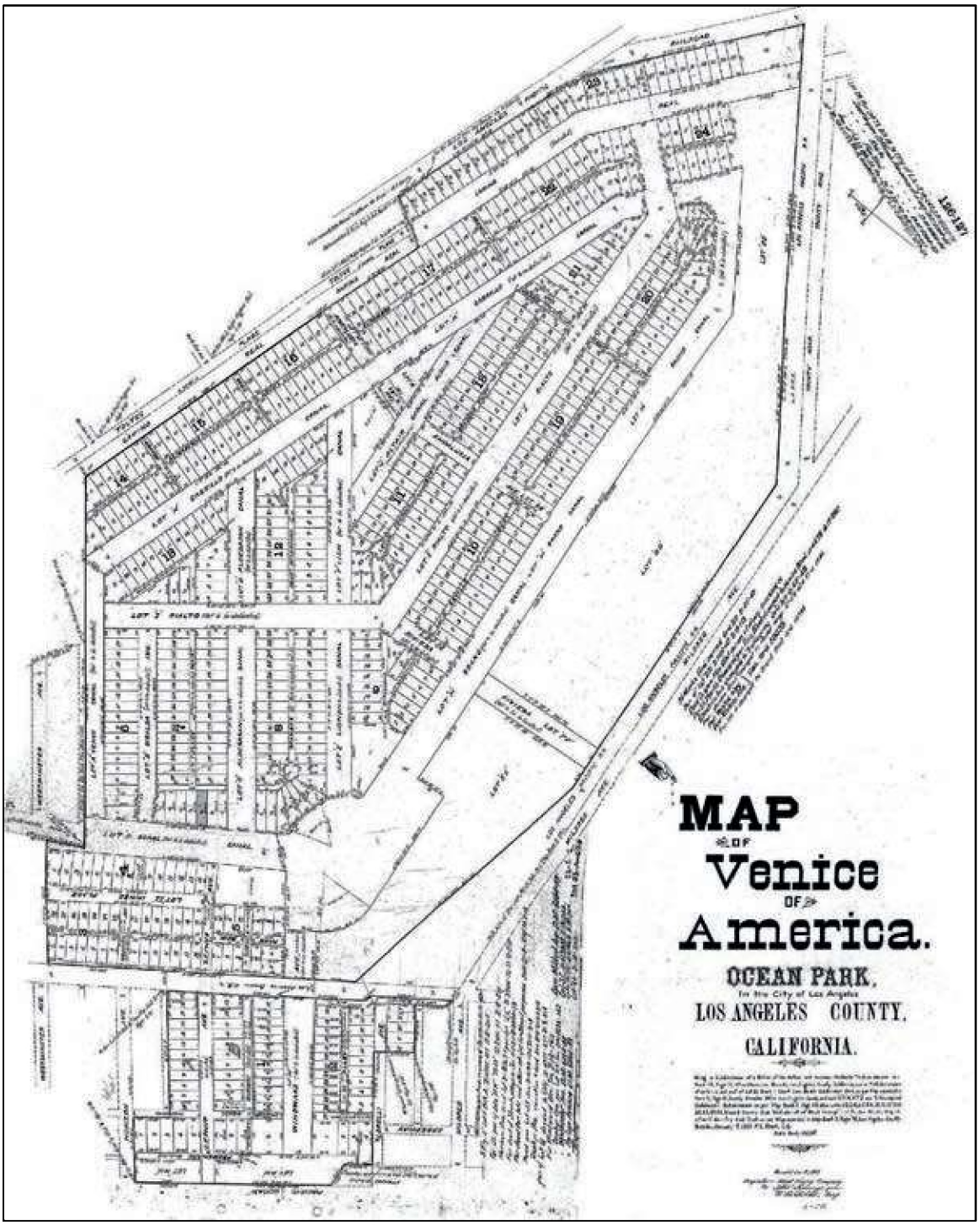


Figure 10. Venice of America tract, subdivided 1905 (County of Los Angeles, Department of Public Works). Subject property (Lot 5, Block 7) at lower left shaded in gray.

VII. ARCHITECTURAL TYPE

Craftsman, 1905–1930

The following presents a historical overview of Craftsman architecture in Los Angeles; this material is excerpted from the *Los Angeles Citywide Historic Context Statement: Architecture and Engineering: Arts and Crafts Movement, 1895–1930*, completed by GPA Consulting on behalf of OHR for SurveyLA in 2016.

> Craftsman architecture reflected the Arts and Crafts movement's conscious search for the supposed simplicity of a pre-industrial time when objects revealed the skill and craftsmanship of the laborer and, further, a rejection of the highly ornamented Victorian aesthetic. The Craftsman style applied to more than the building envelope; architects designed everything in harmony, from the furniture and fixtures to the landscape. The "ultimate bungalows" of the Craftsman style were usually two stories in height and custom designed by architects working closely with local artisans.[49] Later, the aesthetics of the Craftsman style would be adapted to single-story, mass-produced bungalows grouped in neighborhoods for the middle class.
>
> The style is most closely associated with the work of brothers Charles and Henry Greene of Pasadena. Both followed developments within the British Arts and Crafts movement as well as American publications featuring Craftsman work. The Gamble House in Pasadena (1908) is one of the most venerated examples of Craftsman architecture, incorporating influences from all cultures and historical periods celebrated by the Arts and Crafts movement. The work of Greene and Greene and contemporary architects in the region demonstrates how the Craftsman style came to fruition in Southern California. Many accomplished local architects, such as Sumner Hunt, Frank and Arthur S. Heineman, contributed to the development of the style in Los Angeles. The Craftsman style is characterized by a degree of eclecticism because of the numerous influences on the architects of the movement including Swiss, Japanese, and English architecture.
>
> The body of work by Greene and Greene represents the variations found within the style, though most remaining examples are located in the city of Pasadena. Greene and Greene designed very few houses in Los Angeles. The only remaining example of their work is the Lucy Wheeler House. Constructed in 1905, it is one of the earliest examples of Craftsman architecture in Los Angeles and is located in the Harvard Heights Historic Preservation Overlay Zone. It was a precursor of the two-story Craftsman house, sometimes referred to as an "ultimate bungalow." Initially a tongue-in-cheek term that called attention to the quality and expense of construction, the ultimate bungalow is generally considered a high-style variation of the Craftsman aesthetic. As opposed to smaller developer-built or prefabricated bungalows, two-story Craftsman houses were often commissioned for wealthy residents and designed specifically with the homeowner's needs and the physical site in mind. They generally feature a low-pitched, gabled roof, oversized eaves with massive exposed rafter tails, and windows placed in groups or bands, not singly, as is common with simpler bungalows. A high-style Craftsman house is distinguished by the quality of the materials and complexity of design and may feature custom-designed, elaborate woodwork, stained glass, and other fixtures.

[49] Although the term "ultimate bungalow" is used in the scholarly and popular literature of the Arts and Crafts movement to describe large, often custom-designed style houses, SurveyLA uses the term "bungalow" to refer to one to one- and a half-story Craftsman dwellings.

The influence of Japanese architecture in the work of Greene and Greene was profound, but understated compared with other designers. The house at 5357 Victoria Avenue in the Park Mesa Heights neighborhood is a case in point. Constructed in 1912, the primary elevation of this two-story house is distinguished by two massive stone piers that support the roof of the front entry porch. The roof is pagoda-like with its many gables that peak at the apex and flare at the ends. This not so subtle reference to Japanese architecture can be found in Craftsman houses, both large and small, throughout Los Angeles.

Craftsman style buildings may also exhibit Swiss chalet design references. Landscape architect Andrew Jackson Downing introduced the Swiss chalet to American architecture. In his 1850 book *The Architecture of Country Houses* Downing discussed the merits of the style for hillside properties. William S. B. Dana rejuvenated Downing's ideas and expressed other contemporary concepts. In Dana's 1913 *The Swiss Chalet Book,* he noted the chalet should "rest on a stone foundation" and "all or part of the main story wall may be constructed of masonry." He also mentioned the wood walls (inside and out) should be treated but not painted, and the eaves should be broad as though protecting the "almost human face of the wall below." Dana, like Downing, stressed that the building should harmonize with the landscape and have a rustic feel.[50] Fundamentally an architecture of stained wood, the Swiss chalet was well suited to the goals of the Arts and Crafts movement. However, chalet style influences rarely found their way into the Craftsman style houses of Los Angeles. Although Downing thought the style was fitting for hillside locations, in Los Angeles most examples are found in neighborhoods with flat topography like West Adams. Craftsman houses influenced by chalet architecture are a single, rectangular volume covered by a front-facing gabled roof. The street-facing elevation is often symmetrically arranged, and usually features a second story balcony defined by flat balusters with decorative cutouts. Brackets and bargeboards are typically more decorative than those found in other variations of Craftsman architecture.[51]

The Craftsman bungalow dates from the early 1900s through the 1920s. The bungalow's simplicity of form, informal character, direct response to site, and extensive use of natural materials—particularly wood—was a regional interpretation of the socio-economic and aesthetic reforms espoused by the Arts and Crafts movement's founder, William Morris. Craftsman bungalows generally have rectangular or complex plans, and are one to one-and-a-half stories tall. They have wood clapboard or shingle exteriors and are defined by their horizontality with broad front porches, often composed with stone, clinker brick, or stuccoed porch piers. Other character-defining features include low-pitched front-facing gabled roofs, and overhanging eaves with exposed rafter tails.

The Craftsman airplane bungalow sub-type dates from the early 1900s and reached a peak of popularity in the late 1910s. The Craftsman airplane bungalow is similar to the Craftsman bungalow in plan and is characterized by a "pop up" second floor or half floor, usually one or two rooms in size that "floats" over the larger first story. Rooflines on both the first and second floors have low-pitched gabled roofs, oversized eaves with exposed rafter tails, and bands of windows. The influence of Japanese architecture is quite common in airplane bungalows, achieving an Asian-inspired aesthetic by simplifying the post and

[50] William S.B. Danna, *The Swiss Chalet Book* (New York: The William T. Comstock Company, 1913).

[51] Bricker et al., *Multiple Property Documentation Form, the Residential Architecture of the Arts and Crafts Period in Pasadena, 1895-1918.* National Register of Historic Places Form, 1998, F29.

beam gable support to a Shinto torii (gate) form and converting the chalet overhang into a pagoda roofline with wide curving bargeboard.[52]

Multi-family residences were sometimes constructed in the Craftsman style, the most common of which was the fourplex. There are many examples found in the neighborhoods around Downtown Los Angeles and their features have much in common with the chalet sub-type. The apartment building at 1401 Carroll Avenue in the Angelino Heights Historic Preservation Overlay Zone is a typical Craftsman fourplex. Two stories in height, the rectangular volume is covered by a front-facing gabled roof with broad overhanging eaves. The street-facing elevation is symmetrically arranged with two battered stone piers flanking a front entry porch and balcony.

Designers and builders in Southern California created a local body of work whose elements became hallmarks nationwide of the Craftsman style. Architecture and building firms that worked extensively in Los Angeles included Hudson and Munsell, Meyer and Holler, Heineman and Heineman, Hunt and Eager, Train and Williams, Frank Tyler, and the Tifal Brothers.

Sumner Hunt (1865-1938) came to California in 1889 after being trained as an architect in New York. He opened his own practice in 1893, and at various points in his career worked in partnership with three other architects: Theodore Eisen, A.W. Eager, and Silas Burns. Hunt was extremely active in the architectural community and belonged to several professional organizations, serving as the president of the Southern California Chapter of the American Institute of Architects. He was responsible for the design of many residences and a variety of institutional buildings including museums, social clubs, and schools. Hunt's work—representing several architectural styles including Mission Revival, Shingle Style, Tudor Revival, and Craftsman—was viewed as quite modern in comparison to the late Victorian styles of the turn of the century.

Shortly after opening his office, Hunt was selected by Charles Fletcher Lummis to take charge of the restoration of several California missions. The work was conducted under the auspices of the Landmarks Club, which was founded by Lummis, Hunt, and others. During this period, Hunt and Lummis collaborated on a series of articles in praise of adobe construction and the Mission Revival style. For Lummis' collection of Native American artifacts, Hunt designed the Southwest Museum. The property is listed as a landmark under national, state, and local designation programs.

Although Hunt was instrumental in popularizing the Mission Revival style, it reflected his broader interest in creating an architecture that harmonized with the climate and landscape of Southern California. His contribution to the Craftsman idiom is less well known because many major examples of his work have been demolished. The Arthur Bent House in the Highland Park-Garvanza Historic Preservation Overlay Zone not only represents a now rare example of Hunt's residential work, but also reflects the eclecticism that can be found in many Craftsman houses. Designed in 1904 with A.W. Eager, the Bent House is two stories in height with stone on the first story and stucco with half-timbering on the second story. Many Craftsman style houses feature half-timbering on the second story or in gable ends, a reference to the Tudor Revival style.

[52] Merry Ovnick, *Los Angeles: End of the Rainbow* (Los Angeles: Balcony Press, 1994), 149.

The Craftsman-Tudor Revival hybrid was perfected by another local architect, Frank Tyler (1976-1961). Born in Kansas, he moved to Los Angeles with his family when still a boy. His father, Marcus Tyler, was a builder, and no doubt assisted his son in launching his career as an architect. His educational background is unknown. Although Tyler designed many Shingle style and Craftsman houses for the upper crust, his real impact as a designer was in the middle-class neighborhoods of the West Adams area where he lived. The house at 2892 W. 15th Street is one of many by Tyler in the Harvard Heights Historic Preservation Overlay Zone, most of which blend the Craftsman and Tudor Revival styles.

These hybrids typically have a vertical orientation, a gabled roof with a moderate pitch, and half-timbering in the gable ends—hallmarks of the Tudor Revival. However, they are almost always sheathed in shingle or clapboard and feature spacious front porches, elements of the Craftsman style. Yet another example is the house at 2857 S. Van Buren Place, which is a contributor to the Van Buren Place National Register Historic District and is Los Angeles Historic-Cultural Monument No. 678. Tyler was responsible for hundreds of such houses in neighborhoods developed between 1905 and 1910.

Brothers Arthur S. and Alfred Heineman (1878–1972 and 1882–1974) had no formal training in architecture, which at the time was fairly common. They began as speculators in the real estate and land business before becoming architects. Eventually, Arthur was formally certified as an architect, and Alfred was the firm's "associate," but both were involved in various stages of planning and design. The Gless House in the Windsor Square Historic Preservation Overlay Zone is one of their most important works outside Pasadena. The 1913 house has half-timbering on the exterior, linking it to the Tudor Revival. Art glass in the interior was designed by Alfred Heineman and created by the Judson Studios. Characteristic of many of their works are downward-curved gables, suggestive of thatched Cotswold cottages. In addition to creating commissioned work for wealthy clients, the brothers' early designs appeared in bungalow books. The designs in such books, however, were seldom credited to them. Other examples of their work in Los Angeles include houses for Mary E. Smith (1909) at 1186 W. 27th Street, Lucien and Blanche Gray (1909) at 2525 4th Avenue, and Dr. Smith (1911, West Adams Terrace Historic Preservation Overlay Zone) at 2523 4th Avenue.

The Craftsman style is primarily represented in residential architecture; however, rare examples of institutional architecture are extant in Los Angeles. Several local examples of Craftsman style institutional buildings are women's clubs, including the 1917 Van Nuys Woman's Club and the Eagle Rock Women's Twentieth Century Club. The Eagle Rock Women's Twentieth Century, located on the corner of Hermosa Avenue and Colorado Boulevard in the heart of Eagle Rock's commercial district, is cross-gabled with a hip-on-gable roofline and features an outdoor patio area shaded by trellises, drawing the outside into the interior of the building.

By World War I, the Craftsman style declined in popularity and was outpaced by Period Revival styles. Part of this may be attributed to a change in tastes; heavy, dark wood interiors, and paneling so commonly associated with the Craftsman aesthetic was deemed gloomy and dismal. The Craftsman bungalow continued to be built through the 1920s, but was often painted lighter colors and stripped of its dark wood interior in favor of plaster walls.

VIII. SITE HISTORY

The following presents the property history; this material is excerpted from the 2015 HRA, completed by Jenna Snow in August 2015. SWCA did not attempt to independently research the property's history but to verify this information. As previously stated, the archives of the Los Angeles County Assessor have been closed during this project and thus SWCA could not ascertain exact dates of changes in ownership.

> 1422 Main Street was constructed around 1921 with the address 1422 Coral Canal. Although the original permit is not available, it is possible the house was constructed by Charles G. Chamberlin, who purchased the property around the same time. [53] In 1920, Charles Chamberlin worked as a carpenter at a motion picture studio.[54] By 1930, he had moved to Palm Springs with his family where he is listed in the U.S. Census as a contractor for "home building."[55] Charles Chamberlin may have constructed the house as an investment property as he does not appear to have ever resided there. In 1925, Harry C. Hunt, an auto salesman, lived at the property with his wife Viola J. Hunt.[56] The property was vacant in 1936,[57] but by 1940, Earl Dunlap, a carpenter, rented the property with his wife Laura Dunlap.[58] Charles and Sophie Chamberlin sold the property in 1946 to Sylvia S. London.[59] The property transferred to Sylvia S. Milstead in 1955,[60] which may be an indication of marital status or name. Nicholas J. and Lila E. Carone purchased the property in 1972[61] and held it until 1976, when it was purchased by Reverend Raymond M. and Joanne Maxine Hands,[62] who operated the Last Chance Mission at the property for approximately 10 years.
>
> *History of Alterations*
> 1422 Main Street has undergone many alterations since it was constructed circa 1921.[63] However, there are very few alteration permits. A certificate of occupancy was issued in 1951 for a bedroom addition, which may have been an infill in the area south of the main entrance finished in board and batten siding,[64] although the 1970 Sanborn Fire Insurance [Map] does not show this area infilled. Permits issued in 1968 "To comply with the Venice Rehabilitation File"[65] note that the building had stucco exterior siding. Based on the date of construction and architectural style, the building[66] was originally clad in wood clapboard or shingle siding. A pole sign (not extant) was installed in 1977 and the space was converted to an "office and barber shop, and space for religious

[53] Los Angeles County Archives, Los Angeles County Assessor, Books.

[54] 1920 United States Federal Census, Los Angeles, CA; Precinct 734, Enumeration District: 118, sheet 14A.

[55] 1930 United States Federal Census, Palm Springs, CA, Enumeration District: 20, sheet 2A.

[56] *Santa Monica, Ocean Park, Venice, Sawtelle, and Westgate Directory, 1925* (Los Angeles: Los Angeles Directory Co, 1925).

[57] *Bay Cities Directory, 1936* (Los Angeles: Los Angeles Directory Co, 1936).

[58] 1940 United States Federal Census, Los Angeles, CA, Enumeration district 60-915, page 6A.

[59] Los Angeles County Archives, Los Angeles County Assessor, Books.

[60] Los Angeles County Archives, Los Angeles County Assessor, Books.

[61] Los Angeles County Deeds Books, Instrument No. 2741, August 16, 1972.

[62] Los Angeles County Deeds Books, Instrument No. 1608, February 3, 1976.

[63] Los Angeles County Archives, Los Angeles County Assessor, Books.

[64] City of Los Angeles, Department of Building and Safety, "Certificate of Occupancy," Permit No. V2282/1951, November 9, 1951.

[65] City of Los Angeles, Department of Building and Safety, "Application to Alter-Repair-Demolish and for Certificate of Occupancy," Permit No. 1968WL1180, February 10, 1968.

[66] Los Angeles County Archives, Los Angeles County Assessor, Books.

> counseling/church" later that year.[67] It is not known when the building reverted to a single family residence and there is no evidence of the pole sign. Other alterations include replacement of all fenestration (date unknown), construction of the high wood fence, and the rear patio.

As observed by SWCA, additional alterations to the property include the following: the installation of replacement windows, consisting of metal-framed jalousie, metal-framed hung windows, and vinyl-framed sliding windows, possibly in altered openings (dates unknown); garage demolished (1986), the removal of metal security fencing across the front porch (post-2015); and the installation of stucco-clad façade panels and metal accent panels (post-2015). The 1950 edition of the Sanborn *Fire Insurance Maps of Los Angeles, Venice District* provides a visual record of the property (Figure 11). Details on construction and alterations are provided in Table 3, which lists all available building permits. Key building permits are provided in Appendix C. SWCA conducted independent research into historical city directories and U.S. Census records from 1930 and 1940. However, unknown changes in street and canal names and addresses precluded verifiable identification of early property owners and/occupants.

[67] City of Los Angeles, Department of Building and Safety, "Application to Add-Alter-Repair-Demolish," Permit No. 1977LA38756, January 21, 1977.

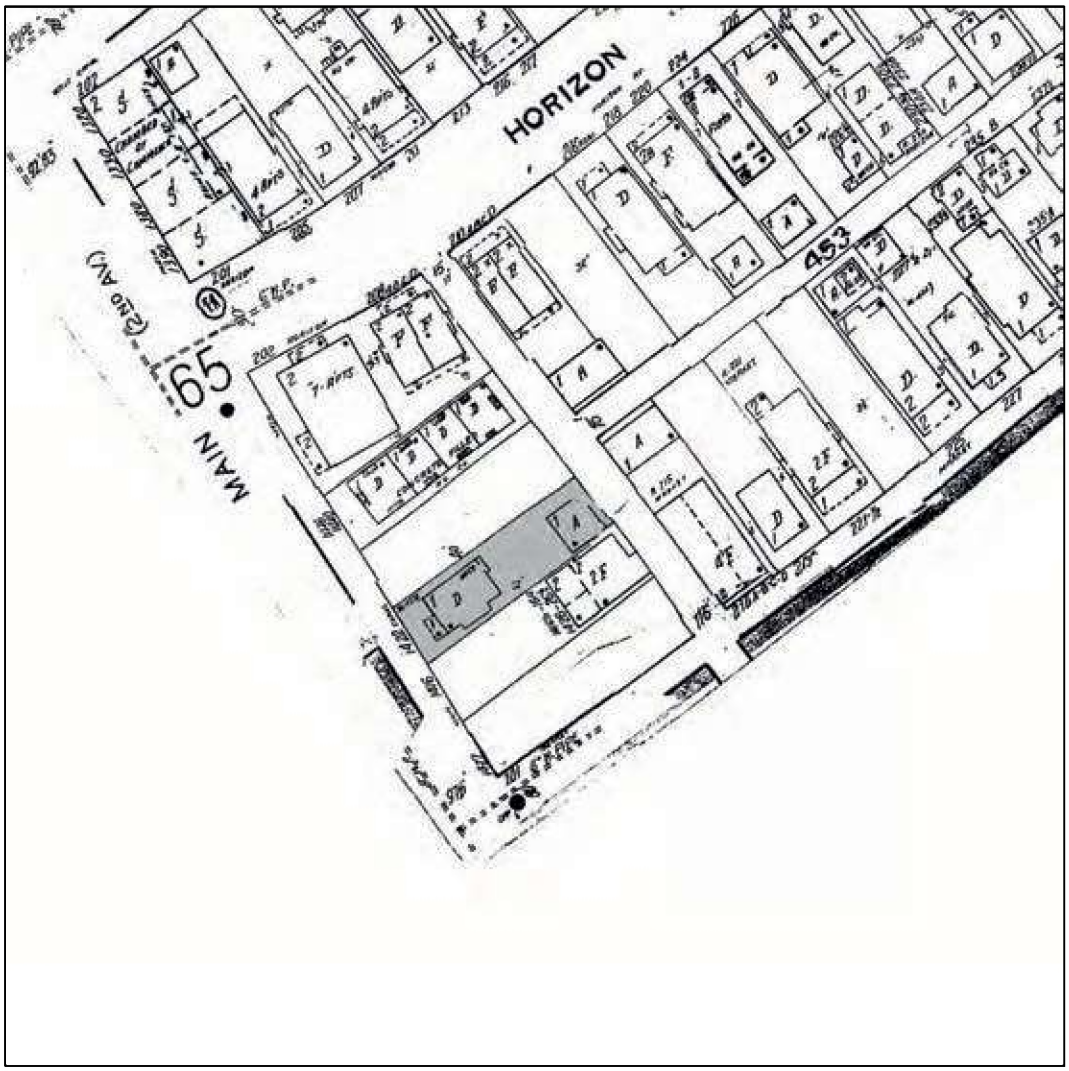


Figure 11. 1422 Main Street, as depicted in the 1950 edition of the Sanborn *Fire Insurance Maps of Los Angeles, Venice District* (Sanborn Fire Insurance Map Company 1950; sheet 77). Subject property shaded in gray.

Table 3. Building Permits on File with City of Los Angeles, Department of Building and Safety for 1422 Main Street.

Date	Permit Number	Owner	Architect	Contractor	Cost	Description
September 26, 1951	2282	S. London	N/A	Surety Const. Co.	$500	**Alteration:** Add to existing and enlarge bedroom. The site plan included with the permit depicts that the addition (measuring approximately 7 × 8 ft) was added just north of the covered porch on the west façade.
February 5, 1968	71179	Sylvia Milstep	N/A	Summit Builders	$400	**Alteration:** Comply with Venice Rehabilitation File no. x19481
February 5, 1968	71180	Sylvia Milstep	N/A	Summit Builders	$1,000	**Alteration:** Comply with Venice Rehabilitation File no. x19481
January 14, 1977	38372	Last Chance Mission	N/A	G. M. Signs	$1,500	**Construction:** At front of lot install steel sign pole and plexiglass sign. Sign to measure approx. 5 × 4 ft.
January 21, 1977	11370	Raymond M. Hands	N/A	Owner	$600	**Alteration:** Reroof with fire retardant material & color coat exterior stucco walls.
January 21, 1977	38756	Raymond M. Hands	N/A	Owner	$1,000	**Alteration:** Convert portion to dwelling, office, barber shop, and religious counseling.
February 1, 1977	39210	Last Chance Mission	N/A	G. M. Signs	$300	**Alteration:** Flash cross on church sign. Cross to measure approx. 1 × 1 ft.
September 8, 1986	64004	George Smith	N/A	George Smith	$1,500	**Demolition:** Demolish garage at a rear (southeast) corner of the garage.

IX. EVALUATION

SurveyLA

SWCA utilized the methodology and framework employed by OHR for the citywide historical resources survey, SurveyLA. In addition to a consideration of all applicable criteria, two relevant Context/Theme/Property Type frameworks and their associated eligibility standards and integrity thresholds were identified and applied to this evaluation.

1. **Context: Pre-Consolidation Communities of Los Angeles, 1862–1932, Theme: Venice, 1901–1925; Sub-Theme: Life in Independent Venice; Property Type: Residential Single-Family.**

   Under this context, a property meeting the eligibility standards and retaining integrity is eligible under Criteria A/1 and B/2 in the areas of significance of Settlement, Social History, Community Planning and Development.

   Period of Significance: 1901–1925

   Period of Significance Justification: The community that became Venice received its first interurban stop in 1901. Venice consolidated with Los Angeles in 1925.

   Eligibility Standards: Represents a resource dating from the pre-consolidation period of Venice. Is associated with the formation, settlement, and/or development of Venice. May be related to Abbot Kinney (Criterion B/2/2) and Venice of America.

   Character-Defining/Associate Features: Retains most of the essential physical features from the period of significance. Related to the life of pre-consolidation Venice by showing how residents lived, worked, shopped, and socialized. May be associated with amusement architecture in general and Abbot Kinney and Venice of America in particular. May be associated with individuals/groups important in Venice's early ethnic/cultural history. For historic districts:

   - Conveys a strong visual sense of overall historic environment from the period of significance.
   - Typically associated with streetcar residential or commercial development and may also be significant within these themes.
   - Must retain the majority of the original planning features and design concepts, particularly in the "walk streets" of residential neighborhoods.

   Integrity Considerations: Should retain integrity of Design, Location, Feeling, and Association from the period of significance. Should maintain original location; for local HCM eligibility, may have been relocated within Sawtelle for preservation purposes. Setting may have changed (surrounding buildings and land uses). Some original materials may have been altered, removed, or replaced. Original use may have changed. Because resources from this time are now rare, a greater degree of alterations or fewer extant features may be acceptable, particularly under local HCM criteria. For Historic Districts:

   - District as a whole should retain integrity of Location, Setting, Design, Feeling, and Association from the period of significance.
   - May include some infill of resources constructed outside the period of significance.

Evaluation: The subject property is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria A/1/1. Although the rear building on the subject property was constructed in 1921, within the 1901–1925 period of significance for pre-consolidation Venice, it is not among the earliest constructed within the tract, which was subdivided in 1905, or within Venice as a whole. Furthermore, due to alterations to the primary façade such as the northwest addition, the sliding doors in place of the original door, and the stucco and metal panels, it no longer conveys a strong visual sense of the overall historic environment of this street from this period, and therefore it does not embody an association with the formation, settlement, and/or development of Venice. Therefore, the subject property is not individually eligible under Criteria A/1/1 for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM.

2. **Context: Architecture and Engineering, 1850–1980; Theme: Arts and Crafts Movement, 1895–1930; Sub-Theme: Craftsman, 1905–1930; Property Type: Residential; Property Sub-Type: Single-Family Residence.**

   Under this context a property meeting the eligibility standards and retaining integrity is eligible under Criteria C/3/3 in the area of significance of Architecture.

   Period of Significance: 1905–1930

   Period of Significance Justification: While Craftsman style features began to creep into the architectural vocabulary as early as 1895, the true expressions of the style were not constructed until 1905. Thus, the period of significance begins in 1905 with the earliest extant examples of the style in its true form. While larger Craftsman style houses were generally not constructed after 1915, the style continued to be used in the design of bungalows through the 1920s.

   Eligibility Standards: Exemplifies the tenets of Arts and Crafts movement and the Craftsman style. Was constructed during the period of significance. Exhibits quality craftsmanship.

   Character-Defining/Associate Features: Retains most of the essential character-defining features of the style. One or two stories in height. Building forms that respond to the site. Shingled exteriors, occasionally clapboard or stucco. Low-pitched gabled roofs. Broad, overhanging eaves with exposed structural members such as rafter tails, knee braces, and king posts. Broad front entry porches of half or full-width, with square or battered columns, sometimes second-story sleeping porches. Extensive use of natural materials for columns, chimneys, retaining walls, and landscape features. Casement windows situated in groups. Represents an early or rare example of the style in the community in which it is located.

   If Airplane, then has a "pop up" second story with one or two rooms.

   If Japanese-influenced, then may have multi-gabled roofs or gables that peak at the apex and flare at the ends.

   If Chalet-influenced, then may have single, rectangular building forms, front-facing gabled roofs, second-story balconies, flat balusters with decorative cutouts or decorative brackets and bargeboards.

   Integrity Considerations: Should retain integrity of Design, Workmanship, Feeling, Setting, and Materials from the period of significance. Craftsman style buildings that have been stuccoed are excluded from individual listing under C/3/3, if they were originally shingled or clapboarded. The most common alteration is the replacement of windows and the enclosure of porches. Some window replacement may be acceptable if the openings have not been resized, particularly windows associated

with kitchens and bathrooms on rear and side elevations. The enclosure of porches is an acceptable alteration so long as the features such as piers and posts have not been removed. Brick or stonework may have been painted; acceptable as it is reversible. Building may have been moved for preservation purposes. Original use may have changed.

Evaluation: The subject property is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria C/3/3 as an example of a Craftsman single-family residence. The residence lacks and/or has lost many of its character-defining features of Craftsman dwellings such as the original front door, shingle or clapboard siding, rafter tails or knee braces. Furthermore, the alterations to the primary façade—the northwest addition, the sliding doors in place of the original door, and the recent stucco and metal panels—have nearly eliminated any sense of the Craftsman style. Therefore, it is not individually eligible under Criterion C/3/3 for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM.

NRHP, CRHR, and HCM Eligibility

Criteria A/1/1: As previously discussed, the subject property is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria A/1/1. Although the rear building on the subject property was constructed in 1921, within the 1901–1925 period of significance for pre-consolidation Venice, it is not among the earliest constructed within the tract, which was subdivided in 1905, or within Venice as a whole. Furthermore, due to alterations to the primary façade such as the northwest addition, the sliding doors in place of the original door, and the stucco and metal panels, it no longer conveys a strong visual sense of the overall historic environment of this street from this period, and therefore it does not embody an association with the formation, settlement, and/or development of Venice. Therefore, the subject property is not individually eligible under Criteria A/1/1 for listing in the NRHP, the CRHR, or for designation as a Los Angeles HCM.

Criteria B/2/2: As previously discussed, research to date did not reveal the subject property to have an association with the lives of significant persons in our past. None of the known owners/occupants associated with the property prior to 1971 (London, Milstep) appear to have been significant in national, state, or local history. Therefore, the subject property is not individually eligible under Criteria B/2/2 for listing in the NRHP, the CRHR, or for designation as a Los Angeles HCM.

Criteria C/3/3: As previously discussed, the subject property is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria C/3/3 as an example of a Craftsman single-family residence. The residence lacks and/or has lost many of its character-defining features of Craftsman dwellings such as the original front door, shingle or clapboard siding, rafter tails or knee braces. Furthermore, the alterations to the primary façade—the northwest addition, the sliding doors in place of the original door, and the recent stucco and metal panels—have nearly eliminated any sense of the Craftsman style. Therefore, it is individually eligible under Criterion C/3/3 for listing in the NRHP, the CRHR, or for designation as a Los Angeles HCM.

Criteria D/4: These criteria are applied most commonly to buildings, structures, or objects that have been used as a source of archaeological data and are believed to contain more, as yet unretrieved data; the subject property was not evaluated under these criteria because evaluation under Criteria D/4 is generally conducted by archaeologists, and this report does not include an evaluation under Criteria D/4 for this reason.

Lost Venice Canals Historic District

As previously discussed, the property is located within the identified Lost Venice Canals Historic District, which SurveyLA identified in 2015. The district was identified as eligible for federal, state, and local listing under Criteria A/1/1 as "a unique example of early-20th century residential development oriented around

the original Venice canals developed by Venice of America founder Abbot Kinney," with a period of significance from 1904-1929.[68] At the time, the subject property was not visible from the public right-of-way and therefore its contributor status was undetermined.

In August 2015 Jenna Snow surveyed and evaluated the subject property in her report *Historic Resource Assessment: 202 E. Horizon Avenue, 208 E. Horizon Avenue, 1414 Main Street, 1422 Main Street, Los Angeles, CA* (2015 HRA). The 2015 HRA assigned the property California Historical Resources Status Code 6Z, meaning it was "found ineligible for the NRHP, the CRHR, and for local designation through survey evaluation." It determined that although the property was built during the period of significance, it did not possess sufficient integrity to convey the significance of the identified district.

The alterations to the primary façade, those identified in the 2015 HRA and those made since, have nearly eliminated any sense of the Craftsman style of 1920s pre-consolidation independent Venice and the Lost Venice Canals Historic District. Specifically, alterations to the primary façade include the northwest addition, the sliding doors in place of the original door, and the recent stucco and metal panels. Therefore, the subject property still lacks sufficient integrity to convey the significance of the Lost Venice Canals Historic District and is not a contributor to the district.

X. CONCLUSION

Based on the preceding investigation and analysis, the subject property at 1422 Main Street is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM. Constructed in 1921 as a single-family dwelling, the subject property is not individually eligible for the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria A/1/1 (Event) as it lacks sufficient integrity to convey a strong visual sense of the overall historic environment of pre-consolidation independent Venice and the Lost Venice Canals Historic District. Research to date did not reveal the property to have an association with significant persons (Criteria B/2/2 - Persons). The property is not individually eligible for the NRHP, the CRHR, or for designation as a Los Angeles HCM under Criteria C/3/3 (Design/Construction) because it lacks sufficient integrity to convey the Craftsman style. Lastly, Criteria D/4 (information potential) is applied most commonly to buildings, structures, or objects that have been used as a source of archaeological data and are believed to contain more, as yet unretrieved data; the subject property was not evaluated under these criteria because evaluation under Criteria D/4 is generally conducted by archaeologists, and this report does not include an evaluation under Criteria D/4 for this reason. Furthermore, the property is not a contributor to the Lost Venice Canals Historic District because the numerous alterations have resulted in loss of sufficient integrity to convey the significance of the Lost Venice Canals Historic District.

[68] Historic Resources Group, *Venice Report: Historic Districts and Multi-Property Resources.* (Prepared for SurveyLA, City of Los Angeles, Department of City Planning, Office of Historic Resources, April 2015), 3.

REFERENCES CITED

Basten, Fred. E. *Santa Monica Bay: The First 100 Years: a pictorial history of Santa Monica, Venice, Ocean Park, Pacific Palisades, Topanga, & Malibu*. Los Angeles: General Publishing Group, 1974.

City of Los Angeles, Department of Building and Safety. Various dates. Building Permits.

City of Los Angeles, Department of City Planning. *WPA Land Use Survey Map for the City of Los Angeles* (1940).

City of Los Angeles, Department of City Planning, Office of Historic Resources. "Guide for Professionals Using the Historic Context Statement for Property Evaluations." January 2016.

City of Los Angeles, Department of City Planning, Office of Historic Resources. July 2017. "Requirements for Phase 1 Historical Resource Assessment Reports."

City of Santa Monica. "Rich in Aviation History and Heritage." Available at: https://www.smgov.net/Departments/Airport/Airport_History.aspx. Accessed February 1, 2018.

County of Los Angeles, Office of the Assessor. Various dates. Records.

County of Los Angeles, Department of Public Works. Venice Short Line Subdivision #1.

Deener, Andrew. "The 'Black Section' of the Neighborhood: Collective Visibility and Collective Invisibility as Sources of Place Identity." *Ethnography: Its Traditions and Its Future* 11, no. 1 (March 2010): 45-67.

Dillon, Brian D. *Archaeological Impact Assessment of the Price-Costco Plaza Project 18.4 +/- Acres in Culver City, Los Angeles County, California*. Prepared for Christopher A. Joseph & Associates, On file at Southern Central Coastal Information Center, 1996.

Electric Railway Historical Association (ERHA) of Southern California, "Venice Short Line." Available at: http://www.erha.org/pewvs.htm. Accessed February 1, 2018,

Friends of the Ballona Wetlands. "Early History." Available at: http://www.ballonafriends.org/history.html#7. Accessed February 1, 2018.

Friends of the Ballona Wetlands 2017; Nathan Masters, "CityDig: When Santa Monica Airport Was Clover Field." *Los Angeles Magazine*, 2014. Available at: http://www.lamag.com/citythinkblog/citydig-when-santa-monica-airport-was-clover-field/. Accessed February 1, 2018

Groves, Martha. "Abbot Kinney Boulevard's Renaissance a Mixed Blessing." *Los Angeles Times*, October 25, 2013.

Hill-Holtzman, Nancy. "Part of Washington Blvd. to Be Renamed." *Los Angeles Times*, February 25, 1990.

Historic Resources Group, *Historic Resources Survey Report: Venice Community Plan Area*. Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources, March 2015.

Historic Resources Group, *Venice Report: Historic Districts, Planning Districts and Multi-Property Resources.* Prepared for SurveyLA, City of Los Angeles, Department of City Planning, Office of Historic Resources, April 2015.

Marie, Clementia. "The First Families of La Ballona Valley." *The Historical Society of Southern California Quarterly*. 37, no. 1 (1955).

McAlester, Virginia, and Lee McAlester. *A Field Guide to American Houses*. 2nd ed. New York: Alfred A. Knopf, 2013.

Moran, Tom. "In Kinney's Own Words." Available at: www.veniceofamerica.org/pdf/mar_apr_2004_newsletter.pdf. Accessed February 1, 2018.

National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, 2002.

Nilson, Lisbet. "A Venice Street is Named for a Visionary." *Los Angeles Times*, October 7, 1990.

Olen, Helaine. Break on Through, Abbot Kinney: Venice, California. *The Baffler*, no. 25 (2014): 156-163.

Prosser, Daniel. *Los Angeles Citywide Historic Context Statement; Context: Pre-Consolidation Communities of Los Angeles, 1862-1932*. Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources, July 2016.

Sanborn Fire Insurance Map Company. City of Los Angeles, 1950.

Scott, Paula A. *Santa Monica: A History on the Edge*. Mt. Pleasant, SC: Arcadia Publishing, 2004.

Stanton, Jeffrey. *Venice California: 'Coney Island of the Pacific."* Los Angeles: Donahue Publishing, 1993.

Sullivan, Rob. "An Intimate Look at History: The Oakwood home that belongs to Thelma Tabor Brawley is a reminder of the special relationship her father had with his employer, Abbot Kinney, the founder of Venice." *Los Angeles Times*. October 7, 1990.

www.ancestry.com
California Death Index, 1940–1997
Los Angeles County Register of Voters, various years
Social Security Death Index
US City Directories, 1822–1995
US Federal Census 1870–1940
U.S. Naturalization Record Indexes, 1791–1992

Appendix A
Resumes of Key Staff

This page intentionally left blank.

NELSON WHITE, M.S.H.P., ARCHITECTURAL HISTORIAN / PROJECT MANAGER

Nelson White is an architectural historian and project manager with 12 years of professional experience. A resident of California for 13 years, his projects include work throughout Northern and Southern California. He is knowledgeable in the history and development of American cities and suburbs, with a focus on residential development and design, and is a federally qualified professional (36 Code of Federal Regulations [CFR] 61) in the fields of architectural history and historic preservation. His statewide experience includes managing and conducting dozens of historical resource surveys and evaluations in compliance with the California Environmental Quality Act (CEQA) and local ordinances. He has prepared numerous cultural resource studies that have utilized federal, state, and local designation criteria to evaluate properties for eligibility as a historic resource for local consideration, for the purposes of CEQA, and as a historic property under Section 106 of the National Historic Preservation Act (NHPA).

Mr. White utilizes his understanding of the *Secretary of the Interior's Standards* to facilitate effective project compliance and design review for adaptive reuse and new construction projects within urban and suburban settings. He works closely with clients and architects to preserve character-defining features of buildings, and he is a member of the California Preservation Foundation (CPF) and the Society of Architectural Historians. He is a frequent volunteer for CPF and has twice served on its annual conference steering committee; he currently serves on its education committee.

YEARS OF EXPERIENCE

12

EXPERTISE

Architectural History

Historic Preservation

Historical Resource Assessments

Project Impacts Analysis

EDUCATION

M.S., Historic Preservation; School of the Art Institute of Chicago, Illinois; 2006

B.A., Architectural History and Urban Design; DePaul University, Chicago, Illinois; 1999

Postgraduate Certificate Program: Public Interest Design; Archeworks; Chicago, Illinois; 2000

Certificate Program: Landscape Architecture; Harvard School of Design, Cambridge, Massachusetts; 1998

REGISTRATIONS / CERTIFICATIONS

Meets and exceeds requirements in the Secretary of the Interior's Professional Qualification Standards in Architectural History and Historic Preservation

MEMBERSHIPS

Steering Committee 2011 and 2017, California Preservation Foundation

SELECTED PROJECT EXPERIENCE

1639-1641 Abbot Kinney Historical Resource Assessment and Impacts Analysis; Balios Capital, LLC; Venice, Los Angeles County, California. Balios Capital, LLC retained SWCA to prepare an Historical Resource Assessment (HRA) for a mixed-use property with a two- and three-story 1935 vernacular-style commercial building at the front of the parcel and a 1918 Craftsman-style bungalow at the rear. Balios Capital proposed to enlarge the commercial building towards the rear of the property and to create surface parking. In order to preserve the historic bungalow Balios proposed to either elevate it one story or to relocate to a nearby park and donate it to a local history non-profit. SWCA evaluated the property under federal, state, and local criteria and prepared a project impacts analysis using the *Secretary of the Interior's Standards for Preservation*. *Role: Project Manager. Conducted intensive-level field survey, archival research, evaluation, project review, and impacts analysis. Co-authored HRA. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

6500 Olympic Place Project Impacts Analysis; Jennifer and Eric Gowey; Los Angeles, Los Angeles County, California. Mr. and Mrs. Gowey retained SWCA to prepare an impacts analysis for a proposed addition to a 1937 Spanish Colonial Revival-style single- family residence that is an identified contributor to a Los Angeles Historic Preservation Overlay Zone (HPOZ). The Goweys proposed to enclose two recessed porches and to add a half-story addition. SWCA prepared a project impacts analysis using the *Secretary of the Interior's Standards for Rehabilitation* and the HPOZ Preservation Plan guidelines for Additions to Primary Structures." *Role: Project Manager. Conducted intensive-level field survey, archival research, design consultation, and impacts analysis. Co-authored report.*

Historical Resource Assessment and Impacts Analysis; Confidential; Los Angeles, Los Angeles County, California. The client retained SWCA to prepare an Historical Resource Assessment (HRA) for a 2.15-acre historic residential estate in Los Angeles. The estate featured several Georgian Revival-style buildings designed by a master architect. The client proposed the demolition and replacement of one building and the demolition and replacement of a wing with a larger wing. SWCA evaluated the property under federal, state, and local criteria and prepared a project impacts analysis using the *Secretary of the Interior's Standards for Rehabilitation. Role: Project Manager. Conducted intensive-level field survey, archival research, evaluation, design consultation, and impacts analysis. Co-authored HRA. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

Roberts Apartments Historic-Cultural Monument Nomination; Morris Landa Apartments, LLC; City of Los Angeles, Los Angeles County, California. Morris Landa Apartments, LLC, retained SWCA to prepare a City of Los Angeles Cultural-Heritage Monument (CHM) nomination for a 1966 Mid-Century Modern-style hillside apartment building located at 1780 North Griffith Park Boulevard. *Role: Project Manager. Prepared nomination and provided support services through the designation process.*

Marquette Residential Development; Pizzulli Associates, Inc.; Los Angeles, Los Angeles County, California. SWCA prepared a Mitigated Negative Declaration (MND) and supporting technical studies, including a tribal cultural resources study, historical resources assessment, biological assessment, and air quality analysis in support of the proposed Marquette Residential Development Project in the Pacific Palisades neighborhood of the City Los Angeles. The proposed Project included the demolition of two dwellings, a 1949 Traditional Ranch-style and a 1952 Contemporary Ranch-style, and the construction of eight new single-family homes. In order to achieve California Environmental Quality Act (CEQA) compliance, SWCA prepared the MND and requisite technical studies for submittal to the Los Angeles Department of City Planning. SWCA prepared deliverables on accelerated schedule and worked closely with the project owner to deliver defensible documents. *Role: Architectural Historian. Conducted intensive-level field survey, archival research, and evaluation. Authored HRA. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

Clínica Romero Cultural Resource Analysis; Los Angeles, Los Angeles County, California; Clínica Romero – Clínica Romero retained SWCA to provide cultural resources services in support of a proposed renovation project. As part of the environmental review of HRSA HIIP grant funding, the clinic was required to provide a letter from the State Historic Preservation Office (SHPO) confirming the renovation would have no effect to historic properties. The property consisted of two Mid-Century Modern-style buildings, a 1957 clinic and a 1974 administrative annex. SWCA prepared an Historical Resources and Archaeological Analysis that evaluated the property under federal, state, and local criteria and analyzed effects of the project implementation including proposed renovation and construction. *Role: Architectural Historian. Conducted intensive-level field survey, archival research, and evaluation. Authored HRA. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

1395 N. Doheny Drive Historical Resource Assessment; 1395 N. Doheny LLC; Los Angeles, Los Angeles County, California. 1395 N. Doheny LLC retained SWCA to prepare an Historical Resource Assessment (HRA) for a 1955 Colonial Revival-style dwelling designed by a master architect. The client proposed to demolish and replace the existing residence. SWCA evaluated the property under federal, state, and local criteria. *Role: Project Manager. Conducted intensive-level field survey, archival research, and evaluation. Co-authored HRE. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

8940 Ashcroft Avenue Historical Resource Assessment; Margo Siegel; West Hollywood, Los Angeles County, California. Ms. Siegel retained SWCA to prepare an Historical Resource Assessment (HRA) for a 1926 Spanish Colonial Revival-style single-family residence. Ms. Siegel proposed to demolish the residence and to construct new two-story single-family residence. SWCA evaluated the property under federal, state, and local criteria. *Role: Project Manager. Conducted intensive-level field survey, archival research, and evaluation. Co-authored HRA. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

1405-1411 Hudson Historical Resources Assessment; ROM Investments, Inc.; Los Angeles, Los Angeles County, California. ROM Investments retained SWCA to prepare an Historical Resources Assessment (HRA) for a multi-family residential property with four one- and two-story vernacular-style dwellings dating from between 1905 and 1911. ROM Investments proposed to demolish and replace three of the dwellings. SWCA evaluated the property under federal, state, and local criteria. *Role: Project Manager. Conducted archival research, evaluation. Co-authored HRA. Co-authored HRA. Prepared California Department of Parks and Recreation (DPR) 523 series resource forms.*

Appendix B

State of California Department of Parks and Recreation Series 523 Forms

This page intentionally left blank.

State of California — The Resources Agency DEPARTMENT OF PARKS AND RECREATION **PRIMARY RECORD**	Primary # HRI # Trinomial NRHP Status Code	
Other Listings Review Code	Reviewer	Date

Page 1 **of** 5 ***Resource Name or #:** 1422 Main Street

P1. Other Identifier: N/A

***P2. Location:** ☐ **Not for Publication** ■ **Unrestricted** ***a. County:** Los Angeles

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad:** Venice, CA **Date:** 1964 **T** 02S ; **R** 15W **Sec** 20

c. Address: 1422 Main Street City: Los Angeles Zip: 90291

d. UTM: Zone: 11S; 364081 mE/ 3761928 mN (G.P.S.)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)

APN: 4238-012-005

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

See continuation sheet

***P3b. Resource Attributes:** (List attributes and codes) HP2. Single-family property.

***P4. Resources Present:** ■ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo: (View, date, accession #) Primary (west) façade of 1422 Main Street, view northeast, June 10, 2021, #1204.

***P6. Date Constructed/Age and Sources:**
■ Historic ☐ Prehistoric ☐ Both
1921, Source: Los Angeles County of the Assessor.

***P7. Owner and Address:**

***P8. Recorded by:** (Name, affiliation, and address)
Nelson White
SWCA Environmental Consultants
51 W. Dayton Street
Pasadena, CA 91105

***P9. Date Recorded:** June 10 , 2021

***P10. Survey Type:** (Describe) Intensive

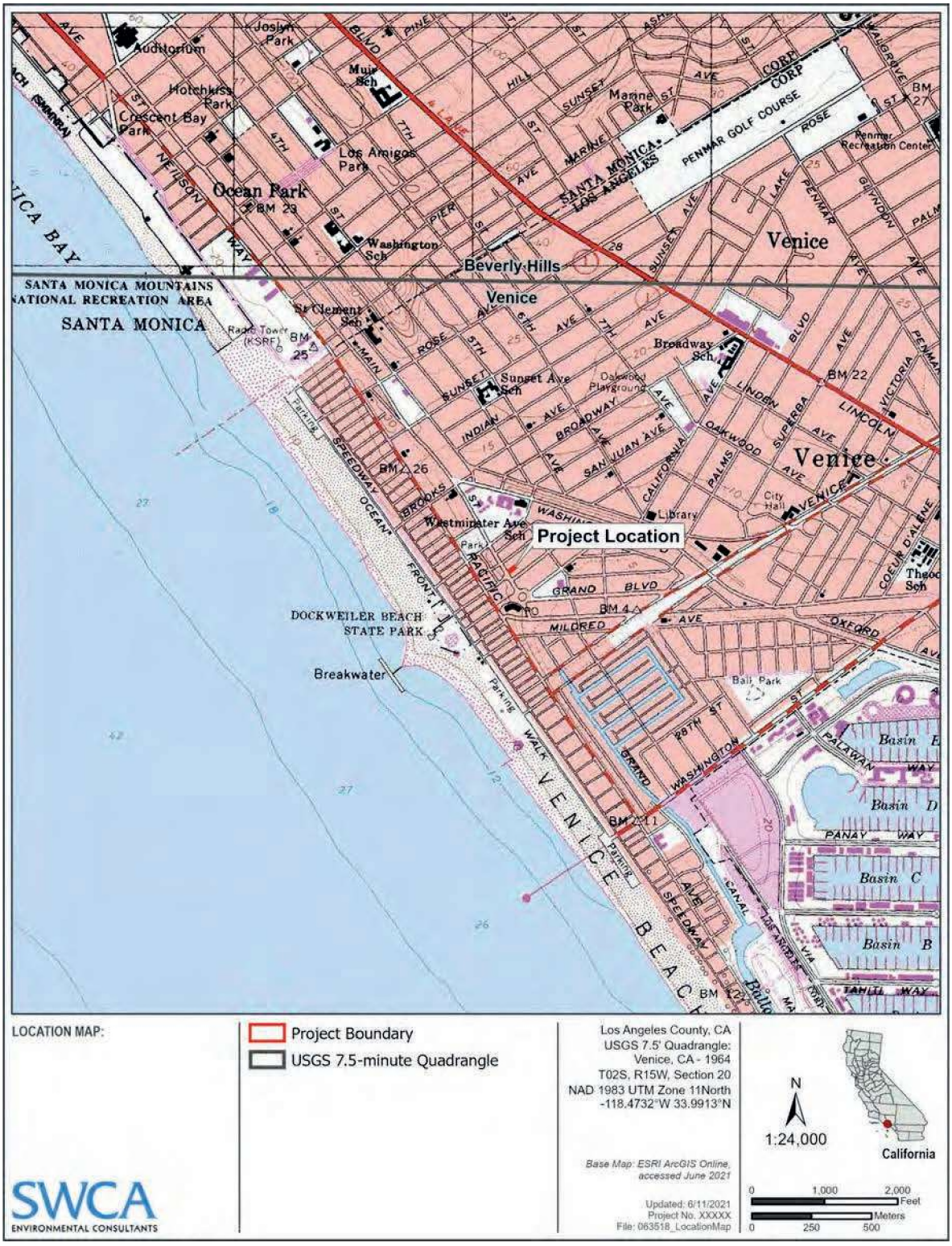
***P11. Report Citation:** (Cite survey report and other sources, or enter "none.") *Historical Resource Assessment for 1422 Main Street, City and County of Los Angeles, California,* (SWCA Environmental Consultants 2021).

***Attachments:** ☐ NONE ■ Location Map ☐ Sketch Map ■ Continuation Sheet ■ Building, Structure, and Object Record ☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record ☐ Photograph Record ☐ Other (List):

State of California — The Resources Agency DEPARTMENT OF PARKS AND RECREATION **LOCATION MAP**	Primary # HRI# Trinomial

 ***Resource Name or #:** 1422 Main Street

***Map Name:** Venice, CA ***Scale:** 1:24,000 ***Date of Map:** 1964



BUILDING, STRUCTURE, AND OBJECT RECORD

***NRHP Status Code** 6Z

***Resource Name or #** (Assigned by recorder) 1422 Main Street

B1. Historic Name: None
B2. Common Name: 1422 Main Street
B3. Original Use: Single-family dwelling
B4. Present Use: Single-family Dwelling
***B5. Architectural Style:** Craftsman
***B6. Construction History:** (Construction date, alterations, and date of alterations)

See continuation sheet

***B7. Moved?** ■ No ☐ Yes ☐ Unknown **Date:** **Original Location:**
***B8. Related Features:** None
B9a. Architect: Unknown
b. Builder: Unknown
***B10. Significance: Theme:** N/A
Area: N/A
Period of Significance: N/A **Property Type:** N/A **Applicable Criteria:** N/A
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

The subject property has received a few known alterations since its original construction in 1921. As observed by SWCA, alterations to the property include the following: the installation of replacement windows, consisting of metal-framed jalousie, metal-framed hung windows, and vinyl-framed sliding windows, possibly in altered openings (dates unknown); the removal of metal security fencing across the front porch (post-2015); and the installation of stucco-clad façade panels and metal accent panels (post-2015).

B11. Additional Resource Attributes: (List attributes and codes) None

***B12. References:**

Teresa Grimes. *Los Angeles Citywide Historic Context Statement: Arts and Crafts Movement, 1895-1930.* Prepared for SurveyLA, City of Los Angeles Department of City Planning, Office of Historic Resources, June 2016.

City of Los Angeles, Department of Building and Safety. Various dates. Building Permits.

County of Los Angeles Assessor's Office records, various dates.

Historic Resources Group. *Venice Report: Historic Districts, Planning Districts and Multi-Property Resources.* Prepared for SurveyLA, City of Los Angeles Department of City Planning, Office of Historic Resources, April 2015.

SWCA Environmental Consultants. *Historical Resource Assessment for 1422 Main Street, City and County of Los Angeles, California.* June 2021.

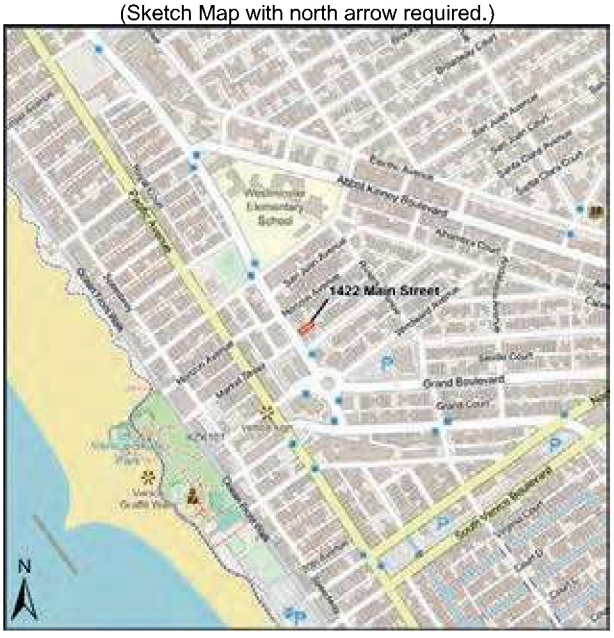
B13. Remarks: None

***B14. Evaluators:** Nelson White, SWCA Environmental Consultants

***Date of Evaluation:** June 10, 2021

(This space reserved for official comments.)

(Sketch Map with north arrow required.)



***P3a.Description**

Description – Continued

The following presents a description of the property; this material is excerpted from the 2015 HRA, completed by Jenna Snow in August 2015. SWCA conducted its own survey on June 10, 2021, to observe the property's current condition.

Exterior

1422 Main Street is a one story, single family house designed in a Craftsman style and located mid-block on Main Street. It is not visible from the street due to the high, wood, fence along the sidewalk line. A shallow yard, at the same elevation as the sidewalk, between the front, west elevation and fence is paved in concrete. A modified rectangle in plan, the exterior is finished in rough textured stucco siding with some areas of board and batten siding at the main, west façade. The front gable roof has wide, overhanging eaves. Fenestration generally consists of single, vinyl and aluminum, vertical sliding sash.

The main, west façade faces Main Street. A low brick wall, topped by a metal security fence, defines a porch area. The porch steps slightly out from the plane of the elevation and has a separate front gable roof with a pierced fascia. The main entrance is defined by a sliding glass and aluminum door. A secondary entrance, consisting of a glass and aluminum hinged door, is placed north of the main entrance along the west façade within a small portion of wall finished in wood, board and batten siding. A contemporary, aluminum, horizontal, sliding window is placed adjacent to the secondary entrance.

The south elevation is built very close to the south property line with the center of the elevation stepped out. The rear, east elevation contains a single, contemporary, wood door with glass lights in the south side of elevation. An older, non-functional, wood door with three lights and a sidelight bump out from the center of the elevation. The north elevation is not accessible.

Interior

Interior finishes have been altered over time. The living/dining room dominates the interior along south side of house and features exposed ceiling beams.

As exhibited in the following photos, the west (primary) façade has changed since the 2015 HRA. SWCA observed that the recessed porch remains but the security fence has been removed. Within the porch a new metal-framed sliding door has been installed. To the south of the porch a new stucco-clad façade panel has been installed that rises above the roof line. Above the gable roof new polished metal panels have been installed, forming a new downward slope from north to south. On the addition to the north, two new narrow stucco-clad façade panels have been installed that also rise above the roof line. The small sliding window remains and the door has been replaced with a commercial-type metal-framed glass door. In between the two stucco panels are more metal accent panels.

***B10. Significance:**

NRHP, CRHR, and Los Angeles HCM Eligibility

Criteria A/1/1: As previously discussed, the subject property is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria A/1/1. Although the rear building on the subject property was constructed in 1921, within the 1901–1925 period of significance for pre-consolidation Venice, it is not among the earliest constructed within the tract, which was subdivided in 1905, or within Venice as a whole. Furthermore, due to alterations to the primary façade such as the northwest addition, the sliding doors in place of the original door, and the stucco and metal panels, it no longer conveys a strong visual sense of the overall historic environment of this street from this period, and therefore it does not embody an association with the formation, settlement, and/or development of Venice. Therefore, the subject property is not individually eligible under Criteria A/1/1 for listing in the NRHP, the CRHR, or for designation as a Los Angeles HCM.

Criteria B/2/2: As previously discussed, research to date did not reveal the subject property to have an association with the lives of significant persons in our past. None of the known owners/occupants associated with the property prior to 1971 (London, Milstep) appear to have been significant in national, state, or local history. Therefore, the subject property is not individually eligible under Criteria B/2/2 for listing in the NRHP, the CRHR, or for designation as a Los Angeles HCM.

Criteria C/3/3: As previously discussed, the subject property is not individually eligible for listing in the NRHP, the CRHR, and for designation as a Los Angeles HCM under Criteria C/3/3 as an example of a Craftsman single-family residence. The residence lacks and/or has lost many of its character-defining features of Craftsman dwellings such as the original front door, shingle or clapboard siding, rafter tails or knee braces. Furthermore, the alterations to the primary façade—the northwest addition, the sliding doors in place of the original door, and the recent stucco and metal panels—have nearly eliminated any sense of the Craftsman style. Therefore, it is individually eligible under Criterion C/3/3 for listing in the NRHP, the CRHR, or for designation as a Los Angeles HCM.

Criteria D/4: These criteria are applied most commonly to buildings, structures, or objects that have been used as a source of archaeological data and are believed to contain more, as yet unretrieved data; the subject property was not evaluated under these criteria because evaluation under Criteria D/4 is generally conducted by archaeologists, and this report does not include an evaluation under Criteria D/4 for this reason.

Lost Venice Canals Historic District

As previously discussed, the property is located within the identified Lost Venice Canals Historic District, which SurveyLA identified in 2015. The district was identified as eligible for federal, state, and local listing under Criteria A/1/1 as "a unique example of early-20th century residential development oriented around the original Venice canals developed by Venice of America founder Abbot Kinney," with a period of significance from 1904-1929.[1] At the time, the subject property was not visible from the public right-of-way and therefore its contributor status was undetermined.

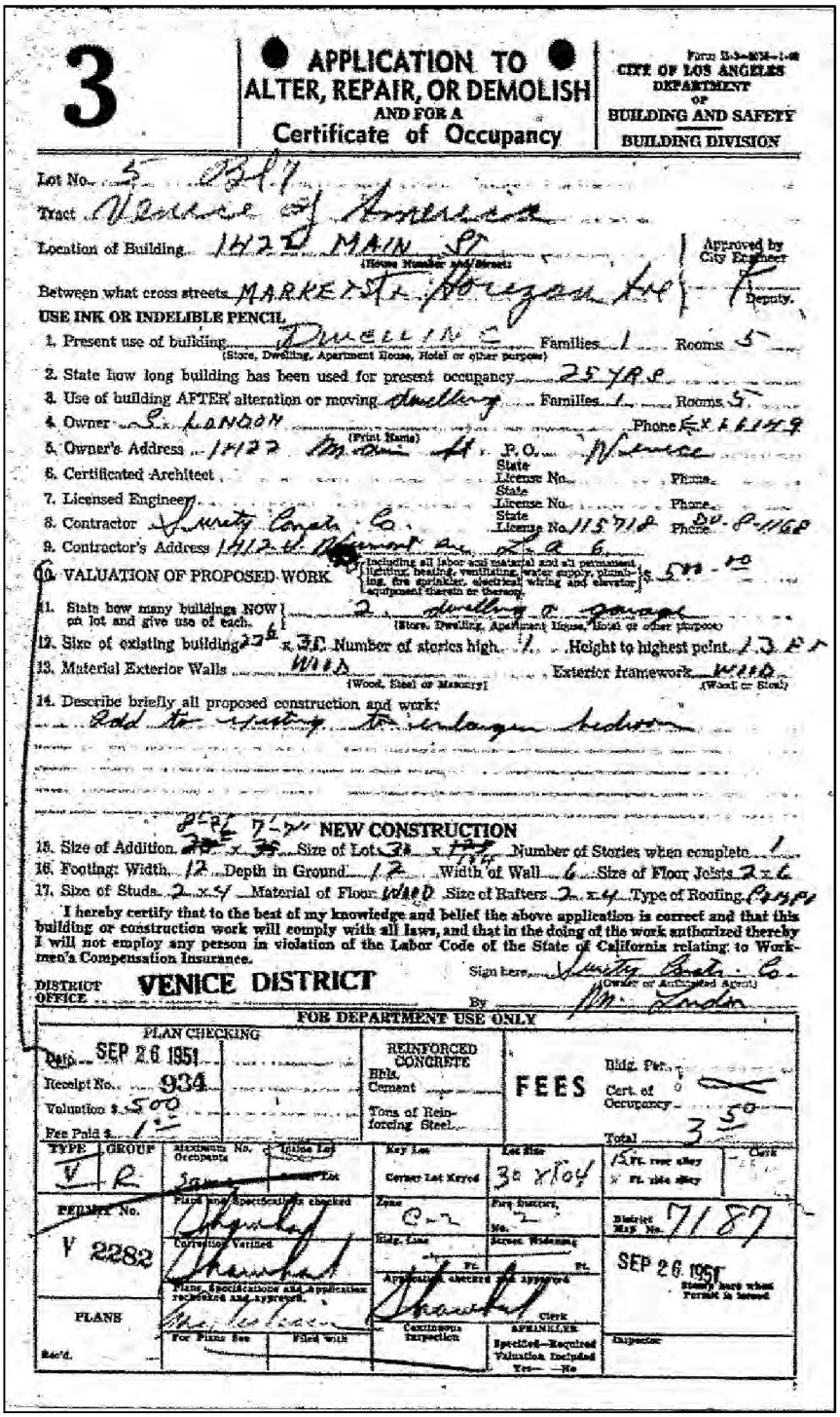
In August 2015 Jenna Snow surveyed and evaluated the subject property in her report *Historic Resource Assessment: 202 E. Horizon Avenue, 208 E. Horizon Avenue, 1414 Main Street, 1422 Main Street, Los Angeles, CA* (2015 HRA). The 2015 HRA assigned the property California Historical Resources Status Code 6Z, meaning it was "found ineligible for the NRHP, the CRHR, and for local designation through survey evaluation." It determined that although the property was built during the period of significance, it did not possess sufficient integrity to convey the significance of the identified district.

The alterations to the primary façade, those identified in the 2015 HRA and those made since, have nearly eliminated any sense of the Craftsman style of 1920s pre-consolidation independent Venice and the Lost Venice Canals Historic District. Specifically, alterations to the primary façade include the northwest addition, the sliding doors in place of the original door, and the recent stucco and metal panels. Therefore, the subject property still lacks sufficient integrity to convey the significance of the Lost Venice Canals Historic District and is not a contributor to the district.

1. Historic Resources Group, *Venice Report: Historic Districts and Multi-Property Resources.* (Prepared for SurveyLA, City of Los Angeles, Department of City Planning, Office of Historic Resources, April 2015), 3.

Appendix C
Key Building Permits

This page intentionally left blank.



3

APPLICATION TO ALTER, REPAIR, OR DEMOLISH AND FOR A Certificate of Occupancy

CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY BUILDING DIVISION

Lot No. 5 Bl 7

Tract Venice of America

Location of Building 1422 MAIN ST (House Number and Street)

Between what cross streets MARKET ST + Horizon Ave

Approved by City Engineer

Deputy.

USE INK OR INDELIBLE PENCIL

1. Present use of building DWELLING (Store, Dwelling, Apartment House, Hotel or other purpose) Families 1 Rooms 5
2. State how long building has been used for present occupancy 25 YRS
3. Use of building AFTER alteration or moving dwelling Families 1 Rooms 5
4. Owner S. LONDON (Print Name) Phone EX 66149
5. Owner's Address 1422 Main St. P.O. Venice
6. Certificated Architect State License No. Phone
7. Licensed Engineer State License No. Phone
8. Contractor Surety Const. Co. State License No. 115718 Phone DU 8-1168
9. Contractor's Address 1412 W. Vermont Ave. L.A. 6
10. VALUATION OF PROPOSED WORK (Including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment therein or thereon) $ 500.00
11. State how many buildings NOW on lot and give use of each. 2 dwelling & garage (Store, Dwelling, Apartment House, Hotel or other purpose)
12. Size of existing building 22 x 30 Number of stories high 1 Height to highest point 13 FT
13. Material Exterior Walls WOOD (Wood, Steel or Masonry) Exterior framework WOOD (Wood or Steel)
14. Describe briefly all proposed construction and work: Add to existing to enlarge bedroom

NEW CONSTRUCTION

15. Size of Addition 8'-8" x 7'-7" Size of Lot 30 x 104 Number of Stories when complete 1
16. Footing: Width 12 Depth in Ground 12 Width of Wall 6 Size of Floor Joists 2 x 6
17. Size of Studs 2 x 4 Material of Floor WOOD Size of Rafters 2 x 4 Type of Roofing Pomp

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

DISTRICT OFFICE VENICE DISTRICT

Sign here Surety Const. Co. (Owner or Authorized Agent)

By M. London

FOR DEPARTMENT USE ONLY

PLAN CHECKING: Date SEP 26 1951; Receipt No. 934; Valuation $ 500; Fee Paid $ 1.00

REINFORCED CONCRETE: Bbls. Cement; Tons of Reinforcing Steel

FEES: Bldg. Per.; Cert. of Occupancy; Total 3.50

TYPE V GROUP R; Maximum No. Occupants; Inside Lot; Corner Lot; Key Lot; Corner Lot Keyed; Lot Size 30 x 104; 15 Ft. rear alley; Ft. side alley; Clerk

PERMIT No. V 2282; Plans and Specifications checked; Zone C-2; Fire District No. 2; District Map No. 7187

Correction Verified; Bldg. Line; Street Widening; Ft.; Ft.

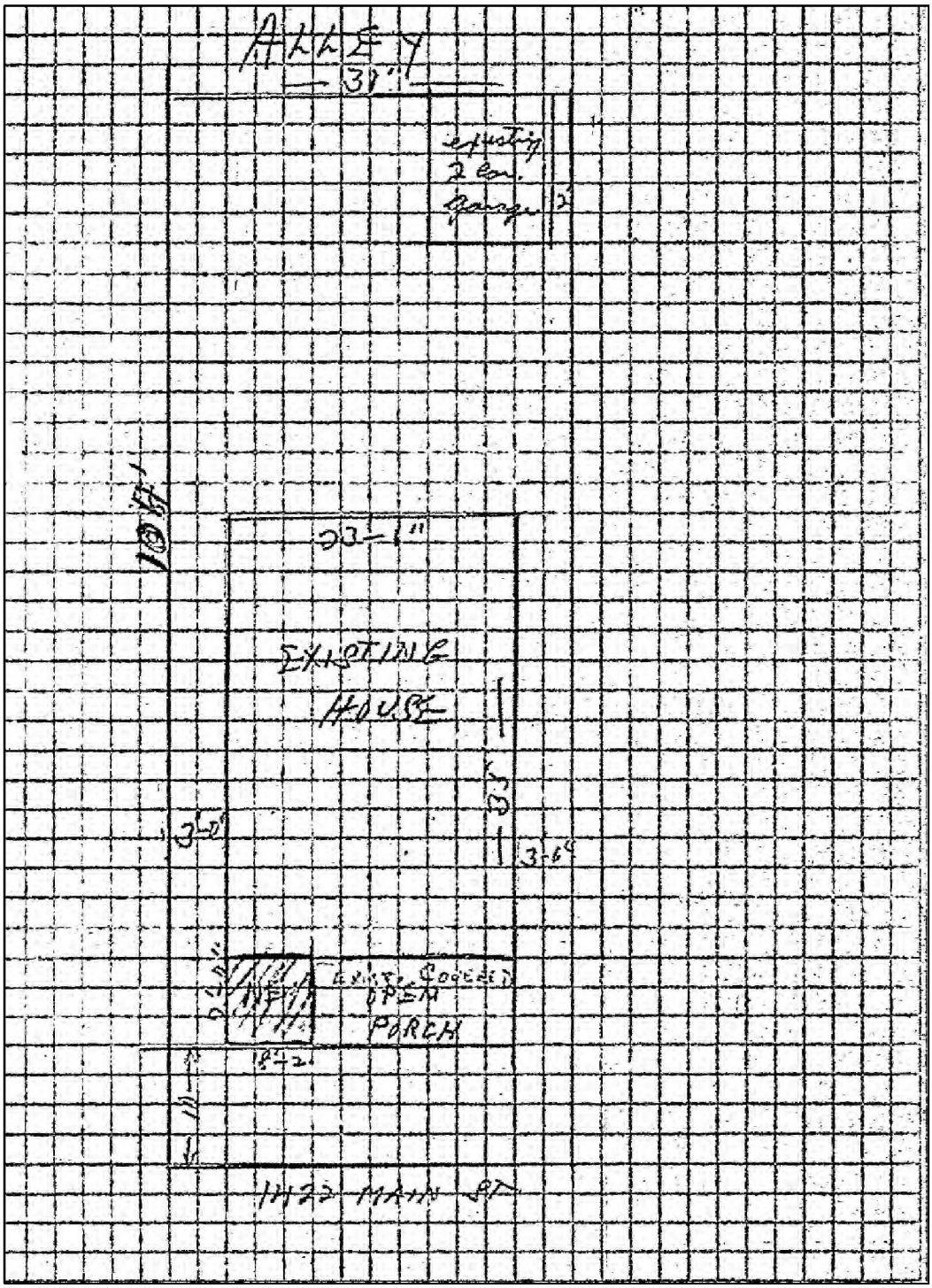
Plans, Specifications and Application rechecked and approved; Application checked and approved; Clerk

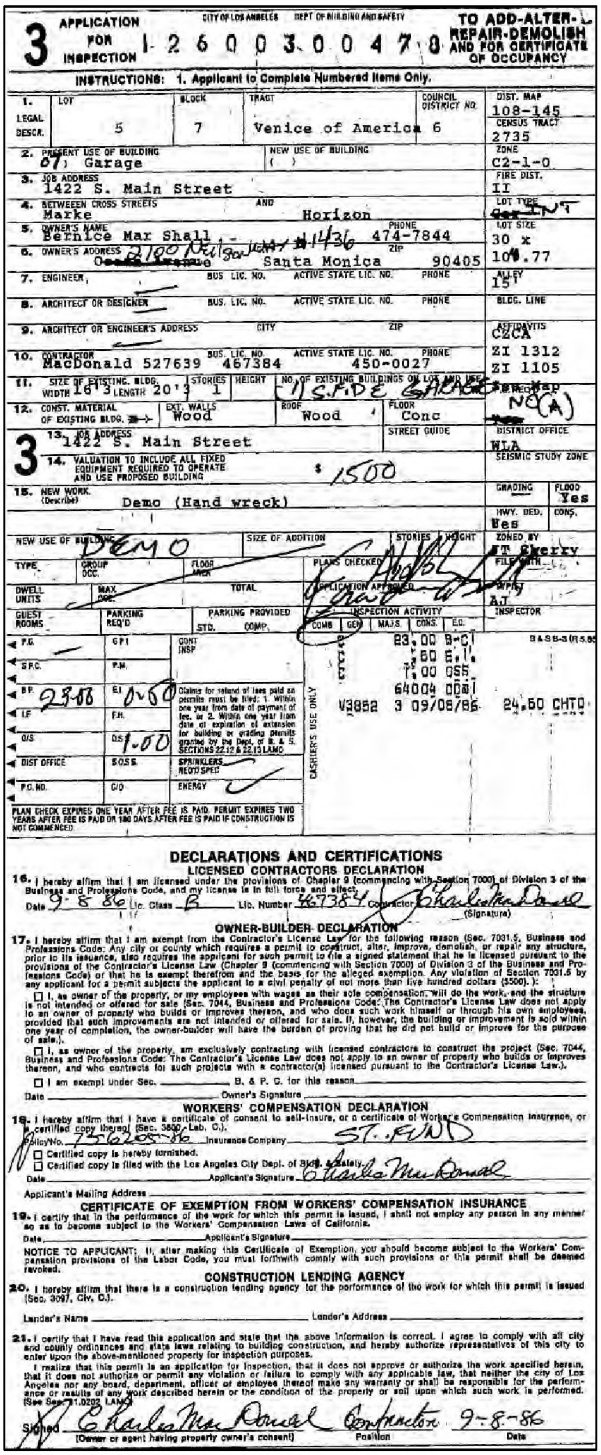
SEP 26 1951 Stamp here when Permit is issued

PLANS; For Plans See; Filed with; Continuous Inspection; SPRINKLER Specified—Required Valuation Included Yes— —No; Inspector

Rec'd.

Figure 12. Permit for addition, 1951 (LADBS, Permit No. 2282, September 26, 1951).


ALLEY
30'-1"
existing
2 car.
garage
20'-1"
EXISTING
HOUSE
3'-0"
3'-6"
OPEN
PORCH
1422 MAIN ST



CITY OF LOS ANGELES DEPT OF BUILDING AND SAFETY

3 APPLICATION FOR INSPECTION 1 2 6 0 0 3 0 0 4 7 0

TO ADD-ALTER-REPAIR-DEMOLISH AND FOR CERTIFICATE OF OCCUPANCY

INSTRUCTIONS: 1. Applicant to Complete Numbered Items Only.

1. LEGAL DESCR. — LOT: 5 | BLOCK: 7 | TRACT: Venice of America | COUNCIL DISTRICT NO.: 6 | DIST. MAP: 108-145 | CENSUS TRACT: 2735
2. PRESENT USE OF BUILDING: 07) Garage | NEW USE OF BUILDING: ( ) | ZONE: C2-1-O
3. JOB ADDRESS: 1422 S. Main Street | FIRE DIST.: II
4. BETWEEN CROSS STREETS: Marke AND Horizon | LOT TYPE: Cor IN T
5. OWNER'S NAME: Bernice Mar Shall - | PHONE: 474-7844 | LOT SIZE: 30 x
6. OWNER'S ADDRESS: 2100 Kelton #1436 | ZIP: Santa Monica 90405 | 10[illegible].77
7. ENGINEER | BUS. LIC. NO. | ACTIVE STATE LIC. NO. | PHONE | ALLEY: 15'
8. ARCHITECT OR DESIGNER | BUS. LIC. NO. | ACTIVE STATE LIC. NO. | PHONE | BLDG. LINE
9. ARCHITECT OR ENGINEER'S ADDRESS | CITY | ZIP | AFFIDAVITS: CECA ZI 1312 ZI 1105
10. CONTRACTOR: MacDonald 527639 | BUS. LIC. NO.: 467384 | ACTIVE STATE LIC. NO. | PHONE: 450-0027
11. SIZE OF EXISTING BLDG. WIDTH 16'3 LENGTH 20'3 | STORIES: 1 | HEIGHT | NO. OF EXISTING BUILDINGS ON LOT AND USE: 1 GARAGE | RE-INSP: NO(A)
12. CONST. MATERIAL OF EXISTING BLDG. → | EXT. WALLS: Wood | ROOF: Wood | FLOOR: Conc
13. JOB ADDRESS: 1422 S. Main Street | STREET GUIDE | DISTRICT OFFICE: WLA
14. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING: $ 1500 | SEISMIC STUDY ZONE
15. NEW WORK (Describe): Demo (Hand wreck) | GRADING | FLOOD: Yes
HWY. DED. | CONS. | ZONED BY: M1 Sherry
NEW USE OF BUILDING: DEMO | SIZE OF ADDITION | STORIES | HEIGHT | FILE NO.
TYPE | GROUP OCC. | FLOOR AREA | PLANS CHECKED | APPROVED | APPD.
DWELL UNITS | MAX. OCC. | TOTAL | APPLICATION APPROVED | INSPECTOR: AJ
GUEST ROOMS | PARKING REQ'D | PARKING PROVIDED STD. COMP. | INSPECTION ACTIVITY: COMB | GEO | MAJS | CONS | ED.
P.C. | G.P.I. | CONT. INSP.
S.P.C. | P.M.
B.P. 23.00 | E.I. 1.00 | Claims for refund of fees paid as permits must be filed: 1. Within one year from date of payment of fee, or 2. Within one year from date of expiration of extension for building or grading permits granting by the Dept. of B. & S. SECTIONS 22.12 & 22.13 LAMC
L.F. | F.H.
O/S | DIS. 1.00
DIST. OFFICE | SOILS
P.C. NO. | C/O | SPRINKLERS REQ'D SPEC | ENERGY

CASHIER'S USE ONLY: CY24 23.00 B-C | 1.00 E.I. | 1.00 DSS | 64004 0001 | V3852 3 09/08/86 24.50 CHTO

PLAN CHECK EXPIRES ONE YEAR AFTER FEE IS PAID. PERMIT EXPIRES TWO YEARS AFTER FEE IS PAID OR 180 DAYS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.

B&SB-3 (11.5.85)

DECLARATIONS AND CERTIFICATIONS

LICENSED CONTRACTORS DECLARATION

16. I hereby affirm that I am licensed under the provisions of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.
Date 9-8-86 Lic. Class B Lic. Number 467384 Contractor Charlotte MacDonald (Signature)

OWNER-BUILDER DECLARATION

17. I hereby affirm that I am exempt from the Contractor's License Law for the following reason (Sec. 7031.5, Business and Professions Code: Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he is licensed pursuant to the provisions of the Contractor's License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):
☐ I, as owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business and Professions Code: The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or through his own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year of completion, the owner-builder will have the burden of proving that he did not build or improve for the purpose of sale.).
☐ I, as owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business and Professions Code: The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractor's License Law.).
☐ I am exempt under Sec. _____ B. & P. C. for this reason _____
Date _____ Owner's Signature _____

WORKERS' COMPENSATION DECLARATION

18. I hereby affirm that I have a certificate of consent to self-insure, or a certificate of Workers' Compensation Insurance, or a certified copy thereof (Sec. 3800, Lab. C.).
Policy No. 7-762255-86 Insurance Company ST. PAUL
☐ Certified copy is hereby furnished.
☐ Certified copy is filed with the Los Angeles City Dept. of Building and Safety.
Date _____ Applicant's Signature Charlotte MacDonald
Applicant's Mailing Address _____

CERTIFICATE OF EXEMPTION FROM WORKERS' COMPENSATION INSURANCE

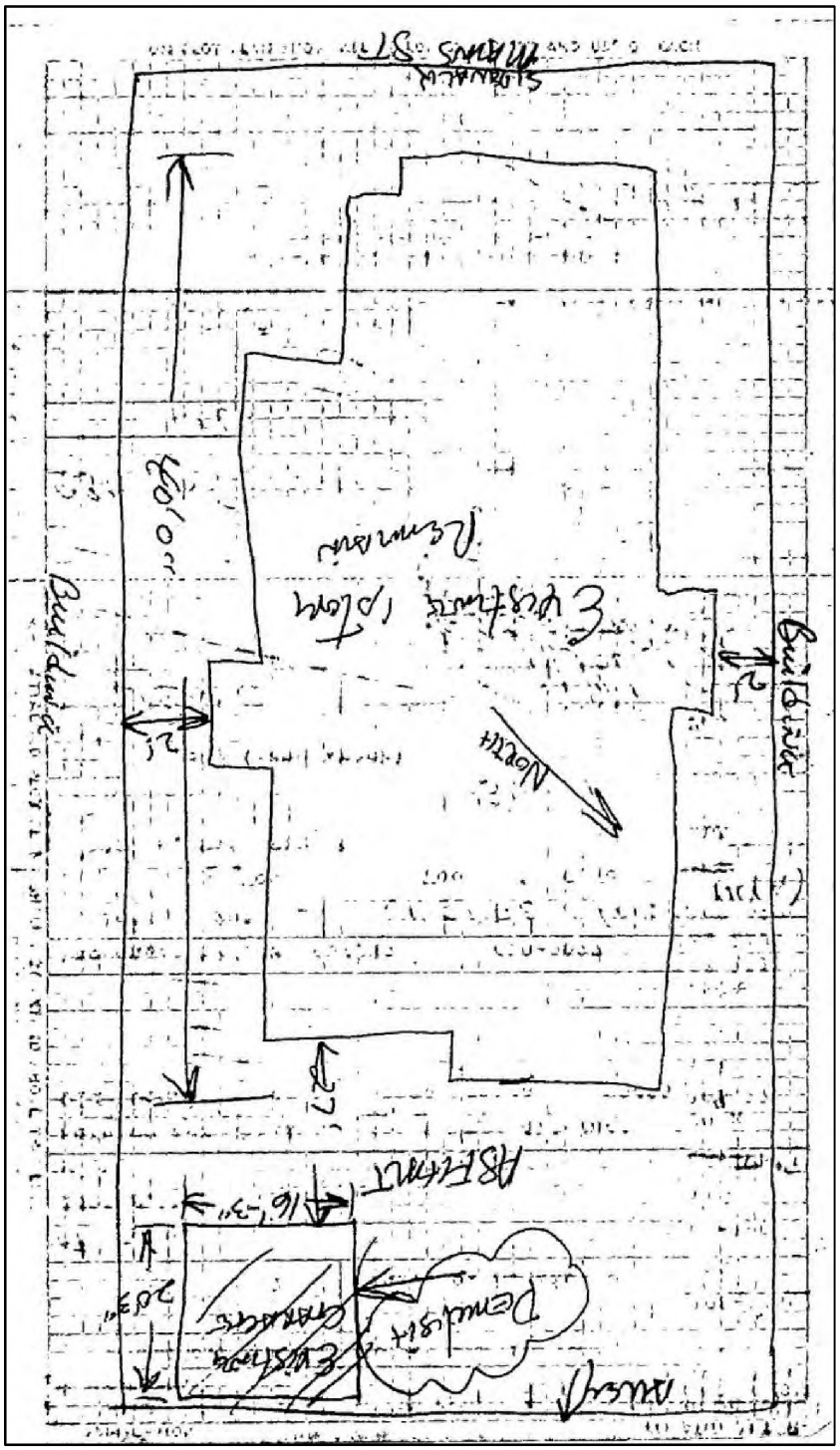
19. I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the Workers' Compensation Laws of California.
Date _____ Applicant's Signature _____
NOTICE TO APPLICANT: If, after making this Certificate of Exemption, you should become subject to the Workers' Compensation provisions of the Labor Code, you must forthwith comply with such provisions or this permit shall be deemed revoked.

CONSTRUCTION LENDING AGENCY

20. I hereby affirm that there is a construction lending agency for the performance of the work for which this permit is issued (Sec. 3097, Civ. C.).
Lender's Name _____ Lender's Address _____

21. I certify that I have read this application and state that the above information is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes.
I realize that this permit is an application for inspection, that it does not approve or authorize the work specified herein, that it does not authorize or permit any violation or failure to comply with any applicable law, that neither the city of Los Angeles nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein or the condition of the property or soil upon which such work is performed. (See Sec. 91.0025, LAMC)
Signed Charlotte MacDonald Contractor 9-8-86
(Owner or agent having property owner's consent) Position Date

Figure 13. Permit for garage demolition, 1986 (LADBS, Permit No. 64004).



CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit F: Environmental Clearance
ENV-2021-2021-CE

DEPARTMENT OF
CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

MONIQUE LAWSHE
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

PRISCILLA CHAVEZ
MARTINA DIAZ
SARAH JOHNSON
PHYLLIS KLEIN
BRIAN ROSENSTEIN
JACOB SAITMAN
ELIZABETH ZAMORA

CITY OF LOS ANGELES
CALIFORNIA

KAREN BASS
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

CRAIG R. WEBER
DEPUTY DIRECTOR

JUSTIFICATION FOR PROJECT EXEMPTION
CASE NO. ENV-2021-2021-CE

On June 26, 2025, the Planning Department determined that the City of Los Angeles Guidelines for implantation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject project as Categorically Exempt under State CEQA Guidelines designate the subject project as Categorically Exempt under State CEQA Guidelines, Article 19 Sections 15301 (Class 1) and 15332 (Class 32), Case No. ENV-2021-2021-CE. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five- story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one-level subterranean garage; and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines Sections 15301 (Class 1) and 15332 (Class 32).

The Notice of Exemption and Justification for Project Exemption for Environmental Case No. ENV-2021-2021-CE is provided in the case file and attached as Exhibit F.

The Class 1 Categorical Exemption allows for demolition and removal of individual small structures such as a duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The project proposed the demolition of two dwelling units and therefore qualifies for an exemption of this Class.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five (5) criteria: a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; c) The project site has no value as habitat for endangered, rare or threatened species; d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and e) The site can be adequately served by all required utilities and public services. The project qualifies for a Class 32 Categorical Exemption as an infill project, as evidenced below:

<u>CEQA Determination – Class 32 Categorical Exemption Applies</u>

a. **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.**

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations: The site is zoned C2-1-O and has a General Plan Land Use Designation of Neighborhood Office Commercial. The project proposes the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces and is in conformance with the General Plan and Zoning Designation.

b. **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. The subject site is comprised of three (3) flat interior, rectangular shaped lots with frontages of approximately 90 feet on Main Street with a varying depth between 97 feet and 104 feet for a total lot width of approximately 9,090 square feet. The site is wholly within the City of Los Angeles, and is completely surrounded by urban uses. Surrounding properties include and multi-story residential uses.

c. **The project site has no value as a habitat for endangered, rare, or threatened species.**

The project site has no value as habitat for endangered, rare or threatened species. The site is not a wildland area, and is not inhabited by endangered, rare, or threatened species: The area around the site is highly urbanized and surrounded by residential uses. NavigateLA shows that the subject site is not located in a Significant Ecological Area. The subject site is improved with two one-story, single-family dwellings constructed in 1921 and 1952 and has no value as a habitat for endangered, rare or threatened species.

d. **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance for pollutant discharge, dewatering, and stormwater mitigations; and Best Management Practices for stormwater runoff. More specifically, RCMs include but are not limited to:

- **Regulatory Compliance Measure RC-AQ-1 (Demolition, Grading and Construction Activities): Compliance with provisions of the Southern California Air Quality Management District (SCAQMD) District Rule 403.** The project shall comply with all applicable standards of the SCAQMD, including the following provisions of District Rule 403:

    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), to prevent excessive amounts of dust.

- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

- General contractors shall maintain and operate construction equipment to minimize exhaust emissions.

- Trucks having no current hauling activity shall not idle but be turned off.

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

These RCMs will reduce any potential impacts on noise and water quality. Furthermore, the project does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) for preparing a traffic study. The project will not conflict with any adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities. Therefore, the project will not have any significant impacts to traffic. Likewise, air quality will not worsen as a result of the proposed project. Interim thresholds were developed by DCP staff based on CalEEMod model runs relying on reasonable assumptions, consulting with SCAQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. **The site can be adequately served by all required utilities and public services.**

The project site will be adequately served by all public utilities and services given that the property was previously developed with commercial uses surrounded by urban uses, served by existing infrastructure, and is consistent with the General Plan.

The project is a transit-oriented, infill development on a site within an urbanized area and meets the criteria outlined above. Therefore, the project qualifies for a Class 32 Categorical Exemption.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

The City has considered whether the proposed Project is subject to any of the six (6) exceptions that would prohibit the use of a categorical exemption as set forth in State CEQA Guidelines Section 15300.2. The six (6) exceptions to this Exemption are: (a) Location; (b) Cumulative

Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

a. **Cumulative Impacts.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The project is consistent with the type of development permitted for the area zoned C2-1-O and designated Neighborhood Office Commercial. The proposed project has submitted a Parking Demand Study and Noise Report to indicate no significant impacts will be made as a result of this project. As such, the proposed project will not exceed thresholds identified for impacts to the area (i.e., traffic, noise, etc.) and will not result in significant cumulative impacts.

b. **Significant Effect Due to Unusual Circumstances.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

The proposed project consists of the demolition of two single-family dwellings, and the construction of a 26,889 square foot, five-story, mixed-use building consisting of 20 residential units, of which four (4) residential units will be set aside for Very Low Income Households; 3,676 square-feet of restaurant uses, including 2,098 square feet of indoor dining Service Floor area and 467 square feet of outdoor dining Service Floor area; 656 square feet of office uses; a one level subterranean garage and a roof deck with solar trellis and a roof access structure, providing 28 parking spaces. The surrounding area is developed with similar residential and commercial uses. There are
9 existing midrise buildings within 0.5 miles of the project site that range between four to five stories. The proposed height and massing are not unusual for the project vicinity or the nearby Windward Circle. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

c. **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. State Route 27 is located more than 7 miles northwest of the project site. Therefore, the project will not impact a designated state scenic highway.

d. **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The project site is not identified as a hazardous waste site or is on any list compiled pursuant to Section 65962.5 of the Government Code.

e. **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

According to SurveyLA and the Office of Historic Resources, the existing structure located at 1422 Main Street was identified as a historic resource. A Historical Resource Assessment report was prepared on June 2021 and concluded the structure was not eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a Los Angeles Historical Cultural Monument.

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit G: LAHD Mello Act and Replacement Unit Determinations

Ann Sewill, General Manager
Tricia Keane, Executive Officer

Daniel Huynh, Assistant General Manager
Anna E. Ortega, Assistant General Manager
Luz C. Santiago, Assistant General Manager

City of Los Angeles

Eric Garcetti, Mayor

LOS ANGELES HOUSING DEPARTMENT
1200 West 7th Street, 9th Floor
Los Angeles, CA 90017
Tel: 213.808.8808

housing.lacity.org

DATE: May 18, 2022

TO: Faisal Roble, Principal City Planner
City Planning Department

FROM: Marites Cunanan, Sr Mgmt Analyst II
Los Angeles Housing Department

SUBJECT: **Mello Act Determination for 1410-1418 South Main Street, Los Angeles, CA 90291**

Planning Case #: APCW-2021-2020-CDP-MEL-SPE-SPP-WDI

Based on information provided by the owners, Three on The Tree L.L.C., a Nevada limited liability company and Three on The Tree Venice, LLC, a Nevada limited liability company, the Los Angeles Housing Department (LAHD) has determined that no affordable units exist at 1410-1418 South Main Street.

The property currently consists of a vacant lot and two single family dwellings. 1410 South Main Street consists of a vacant lot and both 1414 and 1418 South Main Street consist of a two (2) bedroom unit. Per the statement on the application, the owner is proposing to demolish the existing two (2) single family dwellings to construct a new three (3) story mixed used building consisting of nine (9) new dwelling units. Three on The Tree L.L.C., a Nevada limited liability company acquired 1410 South Main Street on March 14, 2017. Three on The Tree Venice, LLC, a Nevada limited liability company acquired 1414 and 1418 South Main Street on April 23, 2021.

Section 4.4.3 of the Interim Administrative Procedures for Complying with the Mello Act requires that LAHD collect monthly housing cost data for at least the previous three (3) years. The owner filed an application with the Department of City Planning (DCP) on March 11, 2021. Therefore, LAHD must collect data from March 2018 – March 2021.

On March 31, 2021, tenant letters were sent to the property.

The Rent Stabilization Ordinance ("RSO") Unit confirmed that 1410 South Main Street has been a vacant lot since March 2018. 1414 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $3,885. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018-2021 for a Moderate Level two (2) bedroom unit is $1,854, therefore the unit was rented at above affordable levels from March 2018 – March 2021. 1418 South Main Street, a two-bedroom unit, was rented during the lookback period at an average amount of $3,551. The average Land Use Schedule 7 Maximum Allowable Rent for the years 2018-2021 for a Moderate Level two (2) bedroom unit is $1,854, therefore the unit was rented above affordable levels from March 2018 – March 2021. The data collected from March 2018 – March 2021 shows that no affordable units exist at 1410-1418 South Main Street.

cc: Los Angeles Housing Department File
Three on The Tree L.L.C., a Nevada limited liability company and Three on The Tree Venice, LLC, a Nevada limited liability company, Owners
Richard A. Rothschild, Western Center on Law and Poverty, Inc.
Susanne Browne, Legal Aid Foundation of L.A.

HIMS: 21-127959

Jonathan Jager, Legal Aid Foundation of L.A.
Juliet Oh, City Planning Department

MAC:lm

Tiena Johnson Hall, General Manager
Luz C. Santiago, Acting Executive Officer

Anna E. Ortega, Assistant General Manager
Luz C. Santiago, Assistant General Manager
Craig Arceneaux, Assistant General Manager

City of Los Angeles

Karen Bass, Mayor

LOS ANGELES HOUSING DEPARTMENT
1910 Sunset Blvd, Ste 300
Los Angeles, CA 90026
Tel: 213.808.8808

housing.lacity.gov

DATE: October 29, 2025

TO: THREE ON THE TREE LLC, a Nevada limited liability company, Owner
Tony Russo, Representative

FROM: Doris Kwok, Sr. Management Analyst I
Los Angeles Housing Department

SUBJECT: **Resident Protections Ordinance (LAMC 16.60)**
(HE, CHIP) Replacement Unit Determination
RE: 1410-1422 South Main Street, Los Angeles, CA 90291

Based on the application for a Replacement Unit Determination (RUD) submitted by THREE ON THE TREE LLC, a Nevada limited liability company ("Owner"), for the property located at 1410-1422 South Main Street (APNs 4238-012-003 Lot 3, 4238-012-004 Lot 4, 4238-012-005 Lot 5) (Property), the Los Angeles Housing Department (LAHD) has determined the following:

- Two (2) units existed on the property within the last five (5) years.
- One (1) unit subject to the Rent Stabilization Ordinance (RSO) must be replaced according to California Government Code Sections 66300.5 and 66300.6 and Los Angeles Municipal Code Section 16.60, as a Protected Unit.
- One (1) of the two (2) units must be replaced as an affordable Protected Unit.
- One (1) unit must be replaced at market rate.

Project Site Requirements

The Resident Protections Ordinance (RPO) prohibits the approval of any Project on a site ("Property") that will require demolition of existing residential dwelling units, or occupied or vacant Protected Units, unless the Project replaces those units as specified below. The RPO applies to all Projects approved by the City on or after February 11, 2025 that involve the demolition or removal of a dwelling unit, with exceptions for certain industrial Projects. The obligation to replace Protected Units does not apply to any units demolished prior to January 1, 2020.

Replacement of Existing Dwelling Units

The Project shall provide at least as many residential dwelling units as the greatest number of residential dwelling units that existed on the Property within the past five (5) years. The affordable replacement units will be restricted in the Project at rents according to the California Department of Housing and Community Investment (HCD) (Land Use Schedule 6).

Replacement of Existing or Demolished Protected Units

The Project must also replace all existing Protected Units and Protected Units demolished on or after January 1, 2020. Protected Units are residential dwelling units on the Property that are, or were (1) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income within the past five (5) years of the date of the RUD application; (2) subject to the Rent Stabilization Ordinance pursuant to Chapter XV of the LAMC, or any other form of rent or price control through a public entity's

valid exercise of its police power within the past five (5) years of the date of the RUD application; (3) rented by lower or very low income households within the past five (5) years of the date of the RUD application; or (4) withdrawn from rent or lease in accordance with the Ellis Act (Chapter 12.75 (commencing with Section 7060) of Division 7 of Title 1 of the California Government Code) within the past ten (10) years of the RUD application.

Whether a Protected Unit must be replaced as an affordable unit at the Project is determined by the income level of the current or last known renter household in occupancy. If a low or below low income tenant currently occupies the Property, replacement will be required at the Acutely Low Income, Extremely Low Income, Very Low Income or Low Income levels based on tenant income information, regardless of the entitlement (such as Density Bonus) sought. Under the RPO, Protected Units must be replaced as affordable units and restricted by a recorded covenant, guaranteeing that the units will be affordable for a term of ninety-nine (99) years from the issuance of the Certificate of Occupancy.

If a unit is vacant, the income of the last known tenant will be used. Interwest, LAHD's contractor, will send Tenant Income Certification (TIC) forms along with additional information to each occupant ("tenant packet"). Tenants have thirty (30) days to complete and return the TIC forms to Interwest. The owner is responsible for working with the occupants to ensure that the requested information is produced in a timely manner.

In the absence of tenant income documentation, affordability will default to extremely low, very low, low income or above-low income based on renter affordability percentages shown in the latest U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) database.

- For Projects that do not involve the removal of residential units subject to the RSO or a covenant, the default affordability percentages will be as follows: 29% extremely low income, 17% very low income and 19% low income, with the remaining 35% of the units presumed to be above-low income;
- For Projects that involve the removal of residential units subject to the RSO or a covenant, all units must be replaced as affordable regardless of the income level of the renter household.
    - In higher opportunity areas and moderate opportunity areas, the default affordability percentages will be as follows: 29% extremely low income, 17% very low income and 54% low income.
    - In lower opportunity areas, the default affordability percentages will be as follows: 44% extremely low income, 26% very low income and 30% low income.

All replacement calculations resulting in fractional units shall be rounded up to the next whole number.

If a unit is required to be replaced as affordable according to current tenant-income information, the unit shall be replaced with the same bedroom-type unit ("Comparable Unit"). If the default per HUD CHAS is applied, the most restrictive requirements between the Fair Housing Requirements for Affordable Housing and replacement requirements will apply.

The number of affordable units in the Project shall be proportionate to the number of the Project's unrestricted units in terms of bedroom type. For example, if a ten unit Project will be composed of two single-bedroom units and eight two-bedroom units and the RUD requires two single-bedroom units to be replaced per HUD CHAS, the Project would need to replace both units as two-bedroom units. This unit mix maintains the proportion of affordable and market rate two-bedroom units in the Project.

Affordable units must be dispersed throughout the Project and there should be no detectable pattern. For example, the affordable units should be proportionally distributed on each floor, and should not be located within the same vertical stack or grouped together.

<u>Tenant Right to Remain and Noticing</u>

- All existing occupants must be allowed to occupy their units until six (6) months before the start of construction activities.
- The Project proponent shall provide existing occupants with written notice of the planned demolition, the date they must vacate, and their rights under this section.
- Notice shall be provided at least six (6) months in advance of the date that existing occupants must vacate plus any additional time required under any other state or local law.
- Any existing occupants who are required to leave their units shall be allowed to return at their prior rental rate if the demolition does not proceed and the Property is returned to the rental market.

Tenant Relocation and Right to Return

All existing Lower Income Household (as defined in California Health and Safety Code Section 50079.5) occupants of Protected Units are also entitled to:

- Relocation benefits under LAMC Section 16.60, and
- If at the time of lease up or sale (if applicable) of a Comparable Unit, a returning occupant remains income eligible, they shall have the right of first refusal ("Right to Return") to a deed-restricted Comparable Unit (same or greater number of bedrooms and bathrooms than their demolished unit).
    - The rent charged must be at either their prior rental rate or "affordable rent" (as defined in California Health and Safety Code Section 50053), whichever is lower, or if for sale, an"affordable housing cost" (as defined in California Health and Safety Code Section 50052.5).
    - The Right to Return does not apply to: (1) a Project that consists of a Single Family Dwelling Unit on a site where a Single Family Dwelling unit is demolished, or (2) a Project that consists of 100% lower income units (excluding any Manager's Unit(s)), unless the occupant of a Protected Unit qualifies for residence in the new development and for whom providing a Comparable Unit would not be precluded due to unit size limitations or other requirements of one or more funding source of the Project.

When a Protected Unit exists that must be replaced as an affordable unit and the tenant does not have a Right to Return in the Project, the affordable replacement unit(s) must contain at least the same total number of bedrooms as the unit(s) being replaced. For example, an existing five (5) bedroom affordable Protected Unit where no Right to Return applies will need to be replaced with a unit or units that total five (5) bedrooms (ex. one (1), five (5) bedroom unit or five (5), one (1) bedroom units). Studio or single-room units do not count as a one (1) bedroom.

Project applicants shall notify existing tenants in writing of all their legal rights under LAMC Section 16.60 A.3(b). Information regarding tenant eligibility, rent guidelines for the new units, and any procedures the tenant will need to follow to exercise their rights under the RPO shall be provided in writing to the tenant.

The applicant shall provide and maintain accurate contact information for tenants to communicate throughout the construction and lease up of the Project. Project applicants or their predecessor-in-interest shall provide written notice to any tenant who is exercising their right to return of major milestones in the development process, including but not limited to: (1) the start of construction, (2) on at least a bi-annual basis provide updates on the anticipated date of when occupancy would be opened, (3) at least 180, 90, 30 and 15 days in advance of the anticipated availability of the unit pursuant to the issuance of the Temporary or Final Certificate of Occupancy, (4) when the Temporary Certificate of Occupancy is issued, and (5) when the Final Certificate of Occupancy is issued.

Single Family Dwelling Units Replacement

Where an affordable Protected Unit consists of a Single Family Dwelling (SFD) and the tenant has a Right to Return in the Project, a Comparable Unit is defined as follows:

- If the existing SFD contains three (3) or fewer bedrooms, the affordable replacement unit(s) must contain the same number of bedrooms.
- If the existing SFD contains four (4) or more bedrooms, the affordable replacement unit(s) must include at least one (1) three (3) bedroom unit. The remaining bedrooms must also be replaced as affordable units.

  For example, if a tenant with the Right to Return occupied an existing protected five (5) bedroom SFD, the applicant may provide that tenant with one (1), three (3) bedroom affordable replacement unit. In addition, the applicant must provide one (1), two (2) bedroom unit or two (2), one (1) bedroom units, therefore replacing all five (5) bedrooms that existed as affordable units.
- The affordable replacement unit(s) is not required to have the same or similar square footage or same number of total rooms as the existing SFD.

If no tenants have the Right to Return, the affordable replacement units may be split up into smaller units as long as the total number of bedrooms are replaced as affordable units.

Unpermitted Use of Residential Dwelling Units

Unpermitted uses may result in the City requiring affordable replacement units according to the HUD CHAS default.

- If a single residential dwelling unit is being used for the owner's personal non-residential space and evidence that no rental income was collected is provided, no affordable replacement of the unit will be required.

The Project

Per the statement received by LAHD on September 8, 2025, the Owner plans to demolish the existing structures and construct a new, nineteen (19) unit apartment building on the Property using CHIP incentives.

Review of Documents

Owner submitted an Application for a RUD for the Property on September 8, 2025. To comply with the required **five (5) year** look back period, LAHD collected and reviewed data from September 2020 to September 2025.

Per the Grant Deeds, Owner acquired the Properties on March 14, 2017 (APN 4238-012-003), April 23, 2021 (APN 4238-012-004), and April 23, 2021 (APN 4238-012-005).

Department of City Planning (ZIMAS), County Assessor Parcel Information (LUPAMS), DataTree database, Billing Information Management System (BIMS) database, and the Code, Compliance, and Rent Information System (CRIS) database, indicates a use code of "010V – Residential – Single Family Residence – Vacant Land" for APN 4238-012-003, "0100 – Residential – Single Family Residence" for APN 4238-012-004, and "0100 – Residential – Single Family Residence" for APN 4238-012-005. Google images dated October 2025, an internet search conducted October 2025, and the RSO Unit supports that the Property contains one (1) vacant lot, one (1) single family residence, and one (1) residential unit with attached commercial space subject to the RSO.

The Los Angeles Department of Building and Safety (LADBS) database indicates that the Owner has applied for a new Building Permit (#25010-10000-00356). As of the date of this memo, the Owner has not applied for Demolition Permits.

Replacement Unit Determination

The Existing Residential Dwelling Units at the Property within the last five (5) years:

ADDRESS	BEDROOM/ BATHROOM TYPE	VACANT OR OCCUPIED AT APPLICATION	PROTECTED?	BASIS OF PROTECTED STATUS	COMPARABLE UNIT REQUIRED
1414 S. MAIN ST.	2 BEDROOMS/ 1 BATHROOM	OCCUPIED	NO	N/A	NO
1422 S. MAIN ST.*	2 BEDROOMS/ 1 BATHROOM	OCCUPIED	YES	RSO	NO
Totals: 2 Units	**4 Bedrooms**				

*Unit also appears in records under the address 1418 S. MAIN St., and is the address that the tenant responded with on their TIC form.

Per the Owner's statement, two (2) units were occupied and completed TIC forms were provided for the households of 1414 S. Main St. and 1422 S. Main St. by the Owner.

Number of Units Existing within five (5) years of Owner's application:	2
Number of Protected Units within five (5) years of Owner's application:	1
Number of Protected Units Ellised within the last (10) years:	0
Number of Comparable Units required per income verification:	0
Number of Above Lower Income unit(s) based on tenant income, but required to be replaced at Low Income per RPO guidelines:	1
Number of Unit(s) NOT subject to affordable replacement, per income verification:	1

Summary of Affordability Requirements
A completed TIC form was provided for the following unit(s), with their corresponding income levels listed:

- 1414 S. MAIN ST. was identified as an Above Lower Income household [2 BEDROOMS/1 BATHROOM]
- 1422 S. MAIN ST. was identified as an Above Lower Income household [2 BEDROOMS/1 BATHROOM]

The Project is located in the Highest Opportunity Area per ZIMAS. Based on the income certification forms provided to LAHD, both households currently occupying the Property were verified to be Above Lower Income. However, in accordance the guidelines of the RPO, one (1) Protected Unit subject to the RSO must be replaced with an equivalent type unit restricted to Low Income Households in the new project.

The remaining one (1) non-Protected Unit(s) verified to have been occupied by an Above Lower Income household needs to be replaced with an equivalent type unit at market rate.

Additional Information

The findings of this RUD are final and effective upon distribution of this determination. LAHD will amend this RUD only in the event of a staff error or if misinformation was provided by the applicant. However, this RUD does **not** vest your Project. Therefore, if your Project is not already vested and you submit a new application with DBS or DCP in the future, a new RUD based on applicable state or local law at the time may be required.

The RPO and Government Code Section 66300.6(b)(3), (4) do not tie benefits afforded to "existing occupants" with any set look back period. Therefore, "existing occupants" in place after the issuance of this RUD may also be entitled to benefits under the RPO and Government Code Section 66300.6.

Please note that all the new units may be subject to the RSO, unless the RSO is inapplicable or an RSO Exemption is filed and approved by LAHD's RSO Section. This replacement determination is provisional and subject to verification by the RSO Section.

****WARNING****

LOT TIES AND PRE-1978 SINGLE FAMILY DWELLINGS

Please be aware that Owner's replacement obligations may change if the development involves single family dwellings built prior to 1978 and lot ties. If a **lot tie** is required for the new Project, Owner's existing RSO replacement obligation, if any, will INCREASE by one and the Project will also be subject to the RSO, unless the existing single family dwelling is demolished before the lots are tied.

Submitting forged or false documents is a crime that may be punishable as a felony under state law (Cal. Penal Code 115). Documents submitted in connection with your application are subject to investigation. The use of any false or forged document may be grounds for revision to the replacement unit determination. If, following an investigation, the City determines that false or forged documents were used to exempt housing units from the replacement obligations required by law, the housing units may be deemed as affordable replacement units. Other applicable penalties may also be applied.

If you have any questions about this RUD, please contact Kevin Schultz at kevin.schultz@lacity.org.

cc: Los Angeles Housing Department File
Planning.HCA@lacity.org, Department of City Planning for discretionary projects, or
LADBS.ahs@lacity.org, Department of Building and Safety for by-right projects

DK:ks

CPC-2021-2020-DB-CDP-SPPC-MEL-HCA

Exhibit H: Public Correspondence

Sienna Kuo <sienna.kuo@lacity.org>

Re: Urgent Request to Oppose 1410–1422 Main Street Development

1 message

Sean Silva <sean.silva@lacity.org> Tue, Feb 24, 2026 at 11:48 AM
To: Janet Smith <janetsmithkotos@gmail.com>
Bcc: sienna.kuo@lacity.org

Good morning Janet,

Thank you for your email. I am writing to acknowledge receipt of your email and to encourage you to submit correspondence to the Department of City Planning staff assigned to the project for inclusion in the case file. The Planning staff member assigned is Sienna Kuo and her email is sienna.kuo@lacity.org.

Please do not hesitate to contact me if you have any questions.

All the best,
Sean

TRACI PARK COUNCILWOMAN LOS ANGELES CITY COUNCIL 11TH DISTRICT

Sean Silva | Deputy, Venice | Planning Liaison
Office of Councilwoman Traci Park ⋆ 11th District
WESTCHESTER: 7166 W. Manchester Ave, LA, CA 90045
(310) 568-8772 TEL |
SIGN UP for the **Better11 Newsletter!**

***PLEASE NOTE**: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. *(including attachments)* *

On Tue, Feb 24, 2026 at 10:47 AM Janet Smith <janetsmithkotos@gmail.com> wrote:

> **Please consider the points below when you tell Councilmember Park that we want to know why she doesn't stand with the neighbors and the unanimous verdict of the VNC and LUPC to oppose this project, as her complaisance implies she is comfortable with it proceeding:**
>
> Dear Mr. Silva,
>
> I am writing to urge **Councilmember Park** to **oppose** the proposed development at **1410–1422 Main Street** in Venice. This project is in direct conflict with the historic character of our neighborhood and should not be approved.
>
> This is the third attempt by this developer to build on this site. The first attempt was for 28 units and was defeated. The second attempt was for 9 units and was narrowly approved at the VNC but apparently was not profitable enough for them and now they want to not only erect 19 units but also 4 commercial restaurants. They are acting as though their previous local approval of 9 units clears the way for this new project. It does not. It is completely untenable for this space, and we need you to stand with us in opposition.
>
> Both the **LUPC** and **VNC** voted **unanimously** to oppose this development due to its disproportionate size, excessive height, and lack of compatibility with the surrounding historic neighborhood. I strongly agree with their findings and respectfully request that you take the following points into consideration:
>
> - **Historic Integrity of the Neighborhood**: The 200 block of Horizon Avenue, where this development is proposed, is part of the "Lost Canals" neighborhood, which has a rich history and a distinctly residential, one- to two-story scale. This project's massive five-story structure would be a stark and disruptive departure from the character of the neighborhood.

- **Excessive Height and Mass**: The project exceeds the allowable height limits set forth in the Venice Specific Plan and fails to provide proper height transitions to mitigate shadow and sunlight impacts on neighboring homes. The surrounding properties are primarily one- and two-story residential homes, and this project will overwhelm the area.
- **Neighborhood Character**: This development would consolidate three lots into a single, much larger property that simply doesn't fit with the scale and historic nature of the surrounding homes. It would block views, change the light and air patterns, and negatively impact the quality of life for longtime residents who have lived in this quiet, historic area for generations.
- **Community Opposition**: At the most recent City Planning hearing, dozens of residents expressed strong opposition to the project, and no one spoke in favor. The overwhelming community opposition, paired with the unanimous rejections from the LUPC and VNC, should clearly signal that this development does not align with the values and needs of the community.

For these reasons, **I respectfully request that you stand with the community and advocate for the denial of this development.** Venice's unique character and historic neighborhoods deserve protection from overdevelopment and inappropriate land use. This is an opportunity for the Councilmember to earn goodwill with her constituents and I trust she will act decisively to oppose it.

Thank you for your time and consideration.

Janet Smith

Venice, CA 90291 since 1988

Sienna Kuo <sienna.kuo@lacity.org>

Urgent! VNC Speaker Authorization for December 10, 2025, 1 pm hearing on 1410-1414-1422 Main St project

1 message

Brian Averill <brian.averill@venicenc.org> Tue, Dec 9, 2025 at 8:57 PM
To: Sienna.Kuo@lacity.org
Cc: ira.brown@lacity.org, juliet.oh@lacity.org, theodore.irving@lacity.org, "Mark.Mack@venicenc.org" <Mark.Mack@venicenc.org>

Sienna Kuo, Planning Assistant
Office of City Planning
200 North Spring Street, Rm 721
Los Angeles, CA 90012

Hi Sienna:

I am writing to advise that our VNC Land Use Chair Mark Mack has been authorized to speak on behalf of the Venice Neighborhood Council at the December 10, 2025 City Planning hearing for the 1410-1414-1422 Main St project/**CPC-2021-2020-DB-CDP-SPPC-MEL-HCA**.

The relevant VNC motions are being sent to you in a separate email. Please extend all courtesies to him including speaking length that neighborhood councils are entitled to receive.

With appreciation,

Brian Averill
President

vnc venice neighborhood council

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Caroline Faraone <faraone.cc@gmail.com> Wed, Dec 10, 2025 at 8:36 AM
To: Sienna.Kuo@lacity.org, Ira.Brown@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear **Ms. Kuo**,

I am writing as a nearby resident to ask City Planning to **deny or postpone** the proposed project at **1410–1422 Main Street**.

Both the **LUPC** and the **Venice Neighborhood Council** voted **unanimously** to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

In reviewing the case file, it also appears that the **application submitted by the developer is incomplete or inaccurate**, including:

- No **ZIMAS Parcel Profile Report**, despite being listed as included.
- No required **Change of Use**, even though residential homes would be replaced by multi-level restaurant/commercial uses.
- The application describes "ground floor commercial," but the plans show **restaurants on upper floors**.
- A "**2'–6' alley dedication (TBD)**" is listed with **no engineering plan or justification**.
- A "**special designation**" box was checked with **no supporting documentation**.
- Analyses required for **Coastal Act**, **CEQA**, and the **Venice Specific Plan** are missing because the filing is not complete.
- The developer appears to be improperly invoking **AB 2097** to avoid providing adequate parking, despite proposing multiple restaurant spaces that will rely entirely on a narrow, substandard alley.

Because of these defects, the City does not have the basic information required to evaluate the project. Approving only the "shell" and leaving critical details for later would unfairly burden the surrounding neighborhood and create repeated future conflicts.

For these reasons, I respectfully request that you **deny** the project or **postpone** the hearing until a complete and accurate application is submitted.

Thank you for your time and consideration.

Sincerely,

Caroline Faraone

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 9:31 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 8:41 AM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov
E-NEWS

[Quoted text hidden]

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

Sienna Kuo <sienna.kuo@lacity.org>

Please Uphold LUPC's Unanimous Denial – 1410–1422 Main Street

1 message

Cindy <brandyremington@gmail.com> Mon, Dec 8, 2025 at 10:13 PM
To: board@venicenc.org
Cc: "sienna.kuo@lacity.org" <sienna.kuo@lacity.org>, smallstreetsbighearts@gmail.com

Dear Venice Neighborhood Council Board Members,

I am writing as a Venice resident to respectfully urge you to uphold the Land Use and Planning Committee's unanimous denial of the proposed development at 1410–1422 Main Street.

The LUPC reached its decision after extensive review and found that the project is deeply out of compliance with the Venice Specific Plan, the certified Land Use Plan, the Coastal Act, and the Mello Act. Key findings include:

1. Unsafe and inadequate alley access

The project forces all vehicle access, loading, trash, and deliveries onto a 14-foot non-conforming alley that cannot safely handle the increased traffic from 19 units, four restaurants, rideshare activity, trash trucks, and delivery vehicles. The LUPC found that this creates unsafe conflicts with pedestrians, cyclists, children, and people with mobility devices.

2. Excessive height, mass, and FAR

The project proposes a height of 57 feet 10 inches, nearly double the 30-foot height limit for this subarea of the Venice Coastal Zone. It also seeks an FAR of 2.95, almost double the allowed 1.5 FAR, and eliminates the required 45-degree step-back plane, creating a five-story wall against 1–2 story homes.

3. Unlawful three-lot consolidation

The Venice LUP allows a maximum of two-lot consolidation (three only with special conditions the applicant does NOT meet). The project illegally consolidates three lots, while failing the exception tests regarding neighborhood compatibility and adequate on-site parking.

4. Total lack of required usable open space or green space

The applicant is requesting a 100% reduction in usable open space—zero square feet where 2,525 square feet is required. This is a complete failure to meet Specific Plan and Coastal Act standards intended to ensure livability, light, air, and access to outdoor space.

5. Violation of the Mello Act

The project demolishes two existing residential structures and replaces them with a predominantly commercial project. The Mello Act prohibits demolition or conversion of residential units into non-residential uses unless the City first proves residential use is infeasible, which has not been demonstrated. This project would create unlawful loss of coastal housing.

6. No public setback or pedestrian realm on Main Street

The project removes the required 5-foot front yard setback, providing no space for trees, landscaping, or pedestrian refuge. This creates a tall, bulky façade directly at the sidewalk and undermines the pedestrian environment of Main Street.

7. Significant adverse impact on coastal access and parking

The applicant seeks substantial parking reductions while adding high-intensity restaurant uses. With only 28 spaces, the project will push parking demand into already overburdened public streets relied upon for beach access—an impact the Coastal Act explicitly prohibits. LUPC also noted that the traffic analysis omitted the restaurant uses, artificially understating project trips.

8. Incompatibility with surrounding historic and residential character

The project creates a five-story mass towering over adjacent 1–2 story homes and the Lost Venice Canals Historic District, with no meaningful transition. This conflicts with Coastal Act requirements to protect the unique visual and community character of Venice.

Given the project's extensive violations of height limits, massing standards, open space requirements, coastal access policies, housing protection laws, and basic life-safety provisions, the LUPC was correct in recommending denial.

I respectfully urge the Board to affirm the LUPC's unanimous denial and protect the safety, character, and livability of our community.

Thank you for your time and dedication to Venice.

Sincerely,
Chris and Cindy Graham
247 Market Street
Venice, CA 90291

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF - 1410-1422 Main St

2 messages

chambers.cindy@gmail.com <chambers.cindy@gmail.com> Wed, Dec 10, 2025 at 8:16 AM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear Ms. Kuo, Ms. Oh, Mr. Bertoni, and Mr. Brown --

I am writing as a Venice resident to ask City Planning to **deny or postpone** the proposed project at **1410–1422 Main Street**.

Both the **LUPC** and the **Venice Neighborhood Council** voted **unanimously** to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

In reviewing the case file, it also appears that the **application submitted by the developer is incomplete or inaccurate**, including:

- No **ZIMAS Parcel Profile Report**, despite being listed as included.
- No required **Change of Use**, even though residential homes would be replaced by multi-level restaurant/commercial uses.
- The application describes “ground floor commercial,” but the plans show **restaurants on upper floors**.
- A “**2'–6' alley dedication (TBD)**” is listed with **no engineering plan or justification**.
- A “**special designation**” box was checked with **no supporting documentation**.
- Analyses required for **Coastal Act**, **CEQA**, and the **Venice Specific Plan** are missing because the filing is incomplete.
- The developer appears to be improperly invoking **AB 2097** to avoid providing adequate parking, despite proposing multiple restaurant spaces that will rely entirely on a narrow, substandard alley.

Because of these serious issues, the City does not have the basic information required to evaluate the project. Approving only the “shell” and leaving critical details for later would unfairly burden the surrounding neighborhood and create repeated future conflicts.

For these reasons, I respectfully request that you **deny** the project or **postpone** the hearing until a complete and accurate application is submitted.

Thank you for your time and consideration.

Sincerely,

Cindy Chambers

Pacific Ave, Venice, CA 90291

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 9:31 AM
To: Theodore Irving <theodore.irving@lacity.org>

Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 8:20 AM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF - 1410-1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov

[Quoted text hidden]

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Cindy <brandyremington@gmail.com> Wed, Dec 10, 2025 at 8:42 AM
To: "sienna.kuo@lacity.org" <sienna.kuo@lacity.org>, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear **Ms. Kuo**,

I am writing as a nearby resident to ask City Planning to **deny** the proposed project at **1410–1422 Main Street**.

Both the **LUPC** and the **Venice Neighborhood Council** voted **unanimously** to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

In reviewing the case file, it also appears that the **application submitted by the developer is incomplete or inaccurate**, including:

• No **ZIMAS Parcel Profile Report**, despite being listed as included.
• No required **Change of Use**, even though residential homes would be replaced by multi-level restaurant/commercial uses.
• The application describes “ground floor commercial,” but the plans show **restaurants on upper floors, including the roof where noise will be an issue for neighbors.**
• A “**2'–6' alley dedication (TBD)**” is listed with **no engineering plan or justification**.
• A “**special designation**” box was checked with **no supporting documentation**.
• Analyses required for **Coastal Act**, **CEQA**, and the **Venice Specific Plan** are missing because the filing is not complete.
• The developer appears to be improperly invoking **AB 2097** to avoid providing adequate parking, despite proposing multiple restaurant spaces that will rely entirely on a narrow alley already difficult to navigate for city waste trucks on a weekly basis.

Because of these shortfalls, the City does not have the basic information required to evaluate the project. Approving only the “shell” and leaving critical details for later would unfairly burden the surrounding neighborhood and create repeated future conflicts.

For these reasons, I respectfully request that you **deny** the project outright. At the very least the city MUST **postpone** the hearing until a complete and accurate application has been submitted.

Thank you for your time and consideration.

Sincerely,

Chris and Cindy Graham
247 Market Street Venice CA

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 9:32 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 8:44 AM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov

[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

Please Uphold LUPC's Unanimous Denial - 1410-1422 Main Street

1 message

chambers.cindy@gmail.com <chambers.cindy@gmail.com> Mon, Dec 8, 2025 at 7:08 PM
To: board@venicenc.org
Cc: Sienna.Kuo@lacity.org, smallstreetsbighearts@gmail.com

Dear Venice Neighborhood Council Board Members,

I am writing as a Venice resident and a twice former VNC councilmember to ***respectfully urge you to uphold the Land Use and Planning Committee's unanimous denial of the proposed development at 1410–1422 Main Street.***

The LUPC reached its decision after extensive review and found that the project is deeply out of compliance with the Venice Specific Plan, the certified Land Use Plan, the Coastal Act, and the Mello Act. Key findings include:

1. **Unsafe and inadequate alley access**

- The project forces all vehicle access, loading, trash, and deliveries onto a 14-foot non-conforming alley that cannot safely handle the increased traffic from 19 units, four restaurants, rideshare activity, trash trucks, and delivery vehicles.
- The LUPC found that this creates unsafe conflicts with ***pedestrians, cyclists, children, people—like me— with mobility challenges and devices, and pets*** (of which there are many that live in this neighborhood; for example, a neighbor regularly uses the alley to play with and train his dog as he doesn't have a yard).

2. **Excessive height, mass, and FAR**

- The project ***proposes a height of 57 feet 10 inches, nearly double the 30-foot height limit for this subarea of the Venice Coastal Zone***.
- It also seeks ***an FAR of 2.95, almost double the allowed 1.5 FAR***, and eliminates the required 45-degree step-back plane, ***creating a five-story wall against 1–2 story homes***.

3. **Unlawful three-lot consolidation**

- The Venice LUP allows a maximum of two-lot consolidation (three only with special conditions the applicant does NOT meet).
- The ***project illegally consolidates three lots***, while failing the exception tests regarding neighborhood compatibility and adequate on-site parking.

4. **Complete lack of required usable open space or green space**

- The applicant is requesting a 100% reduction in usable open space—zero square feet where 2,525 square feet is required.
- This is a complete failure to meet Specific Plan and Coastal Act standards intended to ensure livability, light, air, and access to outdoor space.

5. **Violation of the Mello Act**

- The project demolishes two existing residential structures and replaces them with a predominantly commercial project.
- The Mello Act prohibits demolition or conversion of residential units into non-residential uses unless the City first proves residential use is infeasible, which has not been demonstrated.
- This project would create unlawful loss of coastal housing.

- Yes, we desperately need more housing, specifically more AFFORDABLE HOUSING STOCK. This project doesn't achieve that outcome.. We must put people and affordable housing first; not greed, not developers with deep pockets, not disingenuous, false narratives claiming to better the community.

6. **No public setback or pedestrian realm on Main Street**

- The project removes the required 5-foot front yard setback, providing no space for trees, landscaping, or pedestrian refuge.
- This creates a tall, bulky façade directly at the sidewalk and undermines the pedestrian environment of Main Street.
- The renderings display a monstrosity that is not only ugly compared to the historic residences that line this neighborhood's streets, but also overwhelms the block, neighborhood, and streets.

7. **Significant adverse impact on coastal access and parking**

- The applicant seeks substantial parking reductions while adding high-intensity restaurant uses.
- With only 28 spaces, the project will push parking demand into already overburdened public streets relied upon for beach access—an impact the Coastal Act explicitly prohibits.
- The developers' representative false claims that there are 200 available parking spaces at any given time. THIS IS AN OUTRIGHT LIE.
- LUPC also noted that the traffic analysis omitted the restaurant uses, artificially understating project trips.

8. **Incompatibility with surrounding historic and residential character**

- The project creates a five-story mass towering over adjacent 1–2 story homes and the Lost Venice Canals Historic District, with no meaningful transition.
- This conflicts with Coastal Act requirements to protect the unique visual and community character of Venice.
- Further, the construction alone might place nearby residences in jeopardy, especially when excavating to create an underground parking structure so close to the coast. We've witnessed the outcome in other Venice neighborhoods: flooding, street closures, sink holes, trees collapsing, and costly, unnecessary emotional and financial pain—with no recourse—for those living near the construction.

Given the project's extensive violations of height limits, massing standards, open space requirements, coastal access policies, housing protection laws, and basic life-safety provisions, the LUPC was correct in recommending denial.

I respectfully urge the Board to affirm the LUPC's unanimous denial and protect the safety, character, and livability of our community.

Thank you for your time and dedication to Venice.

Sincerely,

Cindy Chambers
Pacific Avenue between Venice and Washington Blvds

Sienna Kuo <sienna.kuo@lacity.org>

Subject: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

ERIKS KRUMINS <erikskrumins@me.com> Wed, Dec 10, 2025 at 10:32 AM
To: Sienna.Kuo@lacity.org, juliet.oh@lacity.org, vince.bertoni@lacity.org, ira.brown@lacity.org
Cc: Rick Garvey <smallstreetsbighearts@gmail.com>

Dear Sienna Kuo, Juliet Oh, Vince Bertoni, Ira Brown,

I am writing as a nearby resident to ask City Planning to deny or postpone the proposed project at 1410–1422 Main Street in Venice.

Both the LUPC and the Venice Neighborhood Council voted unanimously to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

LUPC found the project to be fundamentally out of compliance with the Venice Specific Plan, the Land Use Plan, the Coastal Act, and the Mello Act.

Key issues include the following:

• **Vehicular Accessibility:** Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.
• **Height of project:** Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential
historic neighborhood.
• **Lot consolidation:** A 3-lot consolidation is not permitted.
• **Provides no Public Setback on Main Street:** Needs better pedestrian circulation and the possibility to add more public green space on Main Street.
• **The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.**
• **Accessibility** fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
• **Open Space:** The project requests a 100% reduction in usable open space and eliminates the step-back provisions.
• **Design:** The project fails to “harmonize” Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.
• **Impact on Coastal Access:** The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons, I respectfully request that you deny the project or postpone the hearing for the good of our neighborhood.

Thank you for your time and consideration.

And thank you for your service to our community.

Sincerely,

Eriks + Naomi Krumins

248 Horizon Avenue

Venice, CA 90291

erikskrumins@me.com

Mbl (310) 261-0807

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 10:36 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 10:34 AM
Subject: Fwd: Subject: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov
E-NEWS

[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

Please Uphold LUPC's Unanimous Denial – 1410–1422 Main Street

1 message

ERIKS KRUMINS <erikskrumins@me.com> Tue, Dec 9, 2025 at 6:47 PM
To: Sienna.Kuo@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear Sienna Kuo,

I have sent this email to the Venice Neighborhood Council and wanted to make you aware and share with you too.

I am writing as a Venice resident to urge you to **uphold the LUPC's unanimous denial** of the proposed development at **1410–1422 Main Street**.

LUPC found the project to be fundamentally out of compliance with the Venice Specific Plan, the Land Use Plan, the Coastal Act, and the Mello Act.

Key issues include:

- **Excessive height and massing.** The project proposes **57'10"**, nearly double the **25–30 ft** height limit for this subarea, with an FAR of **2.95** and no required step-back plane.
- **Unsafe reliance on a 14-foot alley for all access.** The alley cannot handle traffic from **19 units, four restaurants, deliveries, trash trucks, rideshare, and pedestrians**, creating significant safety hazards.
- **Three-lot consolidation in violation of the LUP.** The project merges **three lots** without meeting the required findings for such consolidation.
- **Zero usable open space where 2,525 sq ft is required.** This is a complete failure to meet open space and livability standards.
- **Loss of existing coastal housing in violation of the Mello Act.** Two residential structures would be demolished without justification or required findings.
- **Parking and coastal access impacts.** With just **28 spaces**, the project provides inadequate parking for residents, staff, and patrons of four restaurants, pushing demand into surrounding neighborhoods and impacting beach access—an issue of Coastal Act concern.
- **Incompatibility with surrounding homes and historic context.** The massing creates a five-story wall next to 1–2 story residences and the Lost Canals Historic District.

Given these substantial inconsistencies with adopted Coastal Zone and community protections, the LUPC's unanimous denial is well-founded.

I respectfully ask you and the Venice Neighborhood Council to **affirm LUPC's recommendation** and deny this project.

Thank you for your service to our community.

Eriks + Naomi Krumins

248 Horizon Avenue

Venice, CA 90291

erikskrumins@me.com

Mbl (310) 261-0807

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Greta Cobar <gretathegreat99@aim.com> Wed, Dec 10, 2025 at 10:13 AM
To: "Sienna.Kuo@lacity.org" <Sienna.Kuo@lacity.org>, "Juliet.Oh@lacity.org" <Juliet.Oh@lacity.org>, "Vince.Bertoni@lacity.org" <Vince.Bertoni@lacity.org>, "Ira.Brown@lacity.org" <Ira.Brown@lacity.org>
Cc: "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>

Dear Ms. Kuo,

I am writing as a nearby resident to ask City Planning to deny or postpone the proposed project at 1410–1422 Main Street.

Both the LUPC and the Venice Neighborhood Council voted unanimously to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

• Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.
• Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential
historic neighborhood.
• Lot consolidation: A 3-lot consolidation is not permitted.
• Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.
• The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.
• Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
• Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.
• Design: The project fails to “harmonize” Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.
• Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons, I respectfully request that you deny the project or postpone the hearing for the good of our neighborhood.

Thank you for your time and consideration.

Sincerely,
Greta Cobar
Mildred Ave.

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 10:29 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 10:16 AM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov
E-NEWS

[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

1410 Main St. Venice, CA. CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

1 message

moeshepard@aol.com <moeshepard@aol.com> Mon, Dec 8, 2025 at 1:25 PM
To: "Sienna.Kuo@lacity.org" <Sienna.Kuo@lacity.org>

4 December 2025

Board Members of Venice Neighborhood Council:

I am Irv Katz, and I live on the 200 block of Market St., just around the corner from 1410 Main St.

I have a view from my living room and bedroom windows of the airspace above 1410 Main St., and that airspace will be taken up by the proposed structure if it is built as currently proposed.

I moved to Market St. in 1974. At that time my neighbors were retired teachers and printers, construction workers, nurses, students, and artists.

I became friends with the people who lived in the two homes at 1414 and 1422 Main St. We would meet at Pietro's, a taproom located where Hama is currently, to shoot pool after work.

I wish to state my strong objection to including a restaurant in this proposal. I have counted 19 licensed bars and restaurants serving alcohol in our neighborhood on Main St., Abbot Kinney, Windward and Pacific, and Ocean Front Walk.

Many, if not most, of the customers of these bars and restaurants arrive by car, and many if not most, park their cars on the streets of the surrounding neighborhood, roughly a 9 square block area. Aside from Main, Abbot Kinney, Pacific, and the beach and 100 block of Windward, these streets are residential. Although some restaurants provide off street valet parking, many of the customers choose to park themselves on these residential streets. Even if a development permit requires off street parking, many of the customers and staff park their cars on the residential streets anyway. Not only are they making it difficult for many residents to find parking when they return from work in the evening, but many are creating a nuisance with loud conversations and music, sometimes even sitting in their cars for extended periods upon arrival and most annoying when leaving late at night.

A restaurant also brings daily and hourly delivery trucks that will block Toledo Court, the alley which is directly behind the proposed site, and is also the alley which serves the residences along the north side of Market St and south side of Horizon Av. The proposed loading dock is not large enough to serve most of the 5 and 10 ton and larger trucks that make these deliveries, and so many will simply park in the alley which will prevent residents, as well as emergency vehicles, from coming and going. Trucks will also park down the middle of Market St. as they do now when making deliveries to Hama which is on the Windward Circle and deliveries are made through Granada Court, the alley off of Market St. These trucks park so that it is difficult to make a turn into or out of Toledo and Granada, assuming they are not already block by other delivery trucks. It is not uncommon for several trucks to be making deliveries simultaneously.

The other problem presented by a restaurant is the daily pick up of trash and recyclables. The trash trucks generally make these pick ups in the early morning hours and they are loud. The recyclable collectors tend to arrive around closing time, midnight to 2 am. They provide a cacophony of bottles and cans being poured

into the backs of their vehicles for as long as it takes. This is all taking place directly behind our homes, just below our bedroom windows. Again, no matter what stipulations, regulations, or rules you or the city impose, this is what actually takes place on a daily basis.

19 bars and restaurants in our neighborhood are more than enough, and there is no justification to add one more.

If you look just across the street from 1410 Main St., you will see 6 homes, 3 fronting on Main St., and 3 fronting on Inness Pl. This site is very close to the same size as the proposed development. There is no commercial component to it. In fact these homes replaced 3 retail establishments, one being a hardware store that some of us sorely miss. The homes are 3 stories with subterranean parking. Lacking a commercial component, they do not create any of the nuisance that a restaurant or some other retail or commercial business will. Parking is confined to the residents and their visitors, and so there is no constant flow of traffic into or out of the garage, and there are no daily deliveries to block the alley or streets or create noise.

I would briefly add that this application nearly doubles what the developer requested 11 years ago when he first made this proposal and was turned down. Now he returns wanting to increase the height to 57' 10" in lieu of the 30' maximum stipulated in the Venice Coastal Zone Specific Plan. He wishes to increase the Floor Area Ratio from 1.5 to 2.95, almost double. He wishes to decrease the set backs on the sides from 8' to 5', almost half, and decrease the front to zero from 5, and in this case the existing sidewalk is already narrower than current city requirements.

I would ask the developers to consider confining this proposal to residential within the requirements of the Venice Plan, which would provide homes, and not create problems that commercial businesses would.

I thank you for your attention and consideration.

Irv Katz

Sienna Kuo <sienna.kuo@lacity.org>

Fwd: NO on 1410-1422 Main Street

1 message

JDub <jdub9901@gmail.com> Tue, Dec 9, 2025 at 10:57 AM
To: "sienna.kuo@lacity.org" <sienna.kuo@lacity.org>

Hi Sienna - Please find the email below, previously sent to the Venice Neighborhood Community Land Use and Planning Commission in opposition to development at 1410-1422 Main.Steet Venice, CA 90291.

Justin Henry

---------- Forwarded message ---------
From: **JDub** <jdub9901@gmail.com>
Date: Thu, Dec 4, 2025, 12:30 PM
Subject: NO on 1410-1422 Main Street
To: <board@venicenc.org>, <LUPC@venicenc.org>

Hi Venice LUPC,

The proposed development for 1410-1422 Main Street as it stands today is out of line with the values and needs of Venice.

- This project abuts a historic neighborhood with alleys and infrastructure that are not sufficient to manage the needs of such a structure and its inhabitants.
- The structure itself is not in line with any of the aesthetics of the area.
- There is no need for such a building given the high vacancy of similar buildings within a few blocks of this one such as 1104 Cabrillo, The Post Office, 73 Market Street and most of 1501 Windward Circle.

Moving this project forward would indicate that the LUPAC is out of touch with the community it serves.

Justin Henry

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Kathleen Rawson <kathleenrawson@gmail.com> Wed, Dec 10, 2025 at 12:44 PM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org
Cc: "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>

Dear City Officials,

I am writing to share my deep concern of the proposed development at 1410-1422 Main Street. Our home is on Horizon Avenue, and the scale of this project is way out of sync with the neighborhood.

The project does not have any submitted plans, so it is impossible for the City or the community to make any educated comments on the development.

Toledo Court is an alley that was established when the Historic Canal District was created by Abbot Kinney. Under no circumstances will the alley accommodate substantial traffic for a rear subterranean garage. In addition, both intersections of Toledo Court and Horizon, and Toledo Court and Market Street are blind. We all need to take great care as we use that space today both for pedestrian and vehicular traffic.

This project is significant, and the neighborhood deserves to understand the project with a real plan and proposal.

We respectfully request you turn this back to the applicant to complete the plans, do real neighborhood outreach and work with the Venice Neighborhood Council before any further City hearings - or deny the project as verbally proposed and require a real application.

Thank you for your consideration.

Kathleen Rawson

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 2:56 PM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>, Ira Brown <ira.brown@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 12:48 PM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov



[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

Please uphold LUPC's Unanimous Denial - 1410-1422 Main Street

1 message

Kevin Sapin <ksapin@gmail.com> Mon, Dec 8, 2025 at 8:34 PM
To: "board@venicenc.org" <board@venicenc.org>, "Sienna.Kuo@lacity.org" <Sienna.Kuo@lacity.org>
Cc: "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>

Dear Venice Neighborhood Council Board Members,

I am writing as a Venice resident to urge you to **uphold the LUPC's unanimous denial** of the proposed development at **1410–1422 Main Street**.

LUPC found the project to be fundamentally out of compliance with the Venice Specific Plan, the Land Use Plan, the Coastal Act, and the Mello Act. Key issues include:

- **Excessive height and massing.** The project proposes **57'10"**, nearly double the **25–30 ft** height limit for this subarea, with an FAR of **2.95** and no required step-back plane.
- **Unsafe reliance on a 14-foot alley for all access.** The alley cannot handle traffic from **19 units, four restaurants, deliveries, trash trucks, rideshare, and pedestrians**, creating significant safety hazards.
- **Three-lot consolidation in violation of the LUP.** The project merges **three lots** without meeting the required findings for such consolidation.
- **Zero usable open space where 2,525 sq ft is required.** This is a complete failure to meet open space and livability standards.
- **Loss of existing coastal housing in violation of the Mello Act.** Two residential structures would be demolished without justification or required findings.
- **Parking and coastal access impacts.** With just **28 spaces**, the project provides inadequate parking for residents, staff, and patrons of four restaurants, pushing demand into surrounding neighborhoods and impacting beach access—an issue of Coastal Act concern.
- **Incompatibility with surrounding homes and historic context.** The massing creates a five-story wall next to 1–2 story residences and the Lost Canals Historic District.

Given these substantial inconsistencies with adopted Coastal Zone and community protections, the LUPC's unanimous denial is well-founded.

I respectfully ask you to **affirm LUPC's recommendation** and deny this project.

Thank you for your service to our community.

Sincerely,
Kevin Sapin
Market street
Venice, CA 90291

Sienna Kuo <sienna.kuo@lacity.org>

Please Uphold LUPC's Unanimous Denial – 1410–1422 Main Street

1 message

LaShawn Moore <lademo89@gmail.com> Mon, Dec 8, 2025 at 3:43 PM
To: Sienna.Kuo@lacity.org, board@venicenc.org

Dear Venice Neighborhood Council Board Members,

As a lifelong resident of Venice, I am writing to respectfully urge you to uphold the Land Use and Planning Committee's unanimous denial of the proposed development at 1410–1422 Main Street. Venice has been BEYOND impacted over the last 15 years, and you can help to make a change. The LUPC reached its decision after extensive review and found that the project is deeply out of compliance with the Venice Specific Plan, the certified Land Use Plan, the Coastal Act, and the Mello Act. Key findings include:

1. Unsafe and inadequate alley access
The project forces all vehicle access, loading, trash, and deliveries onto a 14-foot non-conforming alley that cannot safely handle the increased traffic from 19 units, four restaurants, rideshare activity, trash trucks, and delivery vehicles. The LUPC found that this creates unsafe conflicts with pedestrians, cyclists, children, and people with mobility devices.
2. Excessive height, mass, and FAR
The project proposes a height of 57 feet 10 inches, nearly double the 30-foot height limit for this subarea of the Venice Coastal Zone. It also seeks an FAR of 2.95, almost double the allowed 1.5 FAR, and eliminates the required 45-degree step-back plane, creating a five-story wall against 1–2 story homes.
3. Unlawful three-lot consolidation
The Venice LUP allows a maximum of two-lot consolidation (three only with special conditions the applicant does NOT meet). The project illegally consolidates three lots, while failing the exception tests regarding neighborhood compatibility and adequate on-site parking.

4. Total lack of required usable open space or green space

The applicant is requesting a 100% reduction in usable open space—zero square feet where 2,525 square feet is required. This is a complete failure to meet Specific Plan and Coastal Act standards intended to ensure livability, light, air, and access to outdoor space.

5. Violation of the Mello Act
The project demolishes two existing residential structures and replaces them with a predominantly commercial project. The Mello Act prohibits demolition or conversion of residential units into non-residential uses unless the City first proves residential use is infeasible, which has not been demonstrated. This project would create unlawful loss of coastal housing.

6. No public setback or pedestrian realm on Main Street
The project removes the required 5-foot front yard setback, providing no space for trees, landscaping, or pedestrian refuge. This creates a tall, bulky façade directly at the sidewalk and undermines the pedestrian environment of Main Street.

7. Significant adverse impact on coastal access and parking
The applicant seeks substantial parking reductions while adding high-intensity restaurant uses. With only 28 spaces, the project will push parking demand into already overburdened public streets relied upon for beach access—an impact the Coastal Act explicitly prohibits. LUPC also noted that the traffic analysis omitted the restaurant uses, artificially understating project trips.

8. Incompatibility with surrounding historic and residential character

The project creates a five-story mass towering over adjacent 1–2 story homes and the Lost Venice Canals Historic District, with no meaningful transition. This conflicts with Coastal Act requirements to protect the unique visual and community character of Venice.

Given the project's extensive violations of height limits, massing standards, open space requirements, coastal access policies, housing protection laws, and basic life-safety provisions, the LUPC was correct in recommending denial.
I respectfully urge the Board to affirm the LUPC's unanimous denial and protect the safety, character, and livability of our community.

Venice needs you NOW more than EVER! Thank you for your time and dedication to Venice.

Sincerely,
LaShawn Moore
Brooks Ave
Venice, CA 90291

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

1 message

Liz Burnette <lizburnette@icloud.com> Wed, Dec 10, 2025 at 11:49 AM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear Ms. Kuo,

My name is Liz Burnette, I live on Market Street in Venice and am a nearby resident writing to ask City Planning to deny or postpone the proposed project at 1410–1422 Main Street.

Both the LUPC and the Venice Neighborhood Council voted unanimously to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility.

I strongly agree with their findings and urge the City to take them seriously.

- Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

• Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

- Lot consolidation: A 3-lot consolidation is not permitted.

- Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

- The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

- Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

- Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

- Design: *****The project fails to “harmonize” Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

• Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons, I respectfully request that you deny the project or postpone the hearing for the benefit of our neighborhood, for residents who live here now and for those who will in the future.

Thank you very much for your consideration.

Sincerely,

Liz Burnette
308A Market Street
Venice, CA 90291
lizburnette@icloud.com

City Planning Hearing Agenda for 1410-1422 Main.pdf
197K

Sienna Kuo <sienna.kuo@lacity.org>

Please Uphold LUPC's Unanimous Denial – 1410–1422 Main Street

1 message

Liz Burnette <lizburnette@icloud.com> Tue, Dec 9, 2025 at 12:29 PM
To: "board@venicenc.org" <board@venicenc.org>, sienna.Kuo@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear Venice Neighborhood Council Board Members,

My name is Liz Burnette and I have lived on Market Street (at Riviera) since 1998. As a long time Venice resident I am against the proposed development at **1410–1422 Main Street**, which is scheduled to be heard at LUPC tonight. This is a unique neighborhood and an actual community, where most everyone knows each other by name. Although change is a given in life and people can and will build, I am writing to respectfully urge you to uphold the Land Use and Planning Committee's unanimous denial of the proposed development at 1410–1422 Main Street.

The LUPC reached its decision after extensive review and found that the project is deeply out of compliance with the Venice Specific Plan, the certified Land Use Plan, the Coastal Act, and the Mello Act. Key findings include:

1. Unsafe and inadequate alley access

The project forces all vehicle access, loading, trash, and deliveries onto a 14-foot non-conforming alley that cannot safely handle the increased traffic from 19 units, four restaurants, rideshare activity, trash trucks, and delivery vehicles. The LUPC found that this creates unsafe conflicts with pedestrians, cyclists, children, and people with mobility devices.

2. Excessive height, mass, and FAR

The project proposes a height of 57 feet 10 inches, nearly double the 30-foot height limit for this subarea of the Venice Coastal Zone. It also seeks an FAR of 2.95, almost double the allowed 1.5 FAR, and eliminates the required 45-degree step-back plane, creating a five-story wall against 1–2 story homes.

3. Unlawful three-lot consolidation

The Venice LUP allows a maximum of two-lot consolidation (three only with special conditions the applicant does NOT meet). The project illegally consolidates three lots, while failing the exception tests regarding neighborhood compatibility and adequate on-site parking.

4. Total lack of required usable open space or green space

The applicant is requesting a 100% reduction in usable open space—zero square feet where 2,525 square feet is required. This is a complete failure to meet Specific Plan and Coastal Act standards intended to ensure livability, light, air, and access to outdoor space.

5. Violation of the Mello Act

The project demolishes two existing residential structures and replaces them with a predominantly commercial project. The Mello Act prohibits demolition or conversion of residential units into non-residential uses unless the City first proves residential use is infeasible, which has not been demonstrated. This project would create unlawful loss of coastal housing.

6. No public setback or pedestrian realm on Main Street

The project removes the required 5-foot front yard setback, providing no space for trees, landscaping, or pedestrian refuge. This creates a tall, bulky façade directly at the sidewalk and undermines the pedestrian environment of Main Street.

7. Significant adverse impact on coastal access and parking

The applicant seeks substantial parking reductions while adding high-intensity restaurant uses. With only 28 spaces, the project will push parking demand into already overburdened public streets relied upon for beach access—an impact the Coastal Act explicitly prohibits. LUPC also noted that the traffic analysis omitted the restaurant uses, artificially understating project trips.

8. Incompatibility with surrounding historic and residential character

The project creates a five-story mass towering over adjacent 1–2 story homes and the Lost Venice Canals Historic District, with no meaningful transition. This conflicts with Coastal Act requirements to protect the unique visual and community character of Venice.

Given the project's extensive violations of height limits, massing standards, open space requirements, coastal access policies, housing protection laws, and basic life-safety provisions, the LUPC was correct in recommending denial.

I respectfully urge the Board to affirm the LUPC's unanimous denial.

Thank you for your time and respect for the Venice community. None of us will live forever but destroying the landscape, character and needs of this historic beach community, without acknowledgment of what the community is and needs for safety and livability will have lasting negative effects for those of us here now and for future generations.

Sincerely,

Liz Burnette
308 Market Street #A
Venice, CA 90291

lizburnette@icloud.com

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1425 Main Street, Venice

2 messages

Margaret Molloy <mmmolloy@earthlink.net>
To: Sienna Kuo <sienna.kuo@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Vince Bertoni <vince.bertoni@lacity.org>
Cc: board@venicenc.org, lupc@venicenc.org

Hello Department of City Planning

I agree and include all of the comments of ALL neighbors who unanimously opposed this development at the Venice Neighborhood Council's LUPC and board meeting. The VNC's mandate is to unanimously opposed the project. The VNC board also unanimously opposed it with the exception of the board president who abstains on votes. **I hope that you take that to heart and also den**

Jason Teague has owned that property for many years. He brought two projects forward previously that the community soundly rejected. He's violated the sidewalk setback for years with an unlawful encroachment. At LUPC, Tony Russo stated that the property line is 12 feet back from the street edge. For years, Mr. Teague violated community wellbeing and coastal that encroached seven feet into the public sidewalk. When the City Attorney took action, he got a revocable permit (SOMEHOW) to allow him to maintain a substandard sidewalk maintaining a v setback cut into the fence around a tree well. This just confirms Mr. Teague's entire disregard for the Venice community. There is no humility here.

With CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF, Mr. Teague is back with an even bigger project. Neighbors were not noticed. The proponent submitted a traffic study th that are proposed onsite. It is also disingenuous for Mr. Russo to say that there is no CUB "so that's another bite at the apple" for residents. NO - that just delays prospective restaurant operators s financial hardship without them, and unjustifiably extends the community's required involvement.

The Mello issue is a non-starter. The Mello Act states that **existing residential structures** cannot be converted to a non-residential use unless a very narrow exception applies that is not applicab developer OR the city is saying, the city cannot ignore the explicit language in that state law.

The applicant seeks a density bonus, four restaurants, **and four waivers for additional benefits.** Why would or should the community be subjected to the applicant's greed that increases the build and intensification of use of the property above and beyond a density bonus, in ways that are **only detrimental** to everyone else? **There is no benefit for local residents whatsoever and the enti**

The project site is in the single permit area of the coastal zone. The project's Mass, Scale, and Character; over height/ incompatibility; intensity of use; neighborhood health and safety impacts; etc. must comply with the Coastal Act, regardless of any suggested LAMC Section 12.22 A.25 "density bonus."

The project abuts an entirely residential neighborhood. It's impacts violate Venice Land Use Plan Policies I. A. 5; I. A. 7; and I. B. 11 below:

Venice Land Use Plan (LUP)

Venice Land Use Plan Policy I. A. 5. Preserve and Protect Stable Multi-Family Neighborhoods.
This states that development Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained and improved.

Policy I. A. 7. Multi-family Residential - Low Medium II Density.
d. Oakwood, Milwood, Southeast and North Venice
Use: Duplexes and multi-family structures.

Policy I. B. 11. Intensification of Commercial Uses. Intensification of existing commercial uses, including, but not limited to additions to commercial structures, expansion of indoor or o and conversions of retail uses to sit-down restaurants, shall be required to provide adequate parking to meet the demands of the intensification consistent with LUP Policies II.A.3 and II.A.4.

Let's talk about the alley. It is substandard. Proposed parking for the project is substandard. This alley is the only path of travel for this entire residential and commercial parking; all loading and the entire project; as well as specific trash collection needs for the commercial project. That is untenable. This would create a heath and safety hazard for all residents and visitors; and create a haz Also, importantly, residents on Horizon have private parking garage access in that alley. Any action that denies neighbors easy access to their existing private parking garages would be an illegal cannot be allowed.

As Venice LUP I. A. 5, states, development must "Preserve and Protect Stable Multi-Family Neighborhoods." As discussed here and in ALL of the comments by the community at LUP submissions, there is <u>not</u> sufficient public infrastructure to support this project and the residents' quality of life would not be maintained and improved. Residents' quality of life would

Reject this project 100%. The community has spoken loud and clear.

Appreciatively,

Margaret Molloy

ZIMAS

Search | Reports | Resources | News!

1410 S MAIN ST

Font: A A A +/-

Address/Legal

Site Address	1410 S MAIN ST
ZIP Code	90291
PIN Number	108B145 1701
Lot/Parcel Area (Calculated)	2,954.6 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238012003
Tract	VENICE OF AMERICA
Map Reference	M B 6-126/127
Block	7
Lot	3
Arb (Lot Cut Reference)	None
Map Sheet	108B145
Map Sheet	108A143

Jurisdictional

Permitting and Zoning Compliance

Planning and Zoning

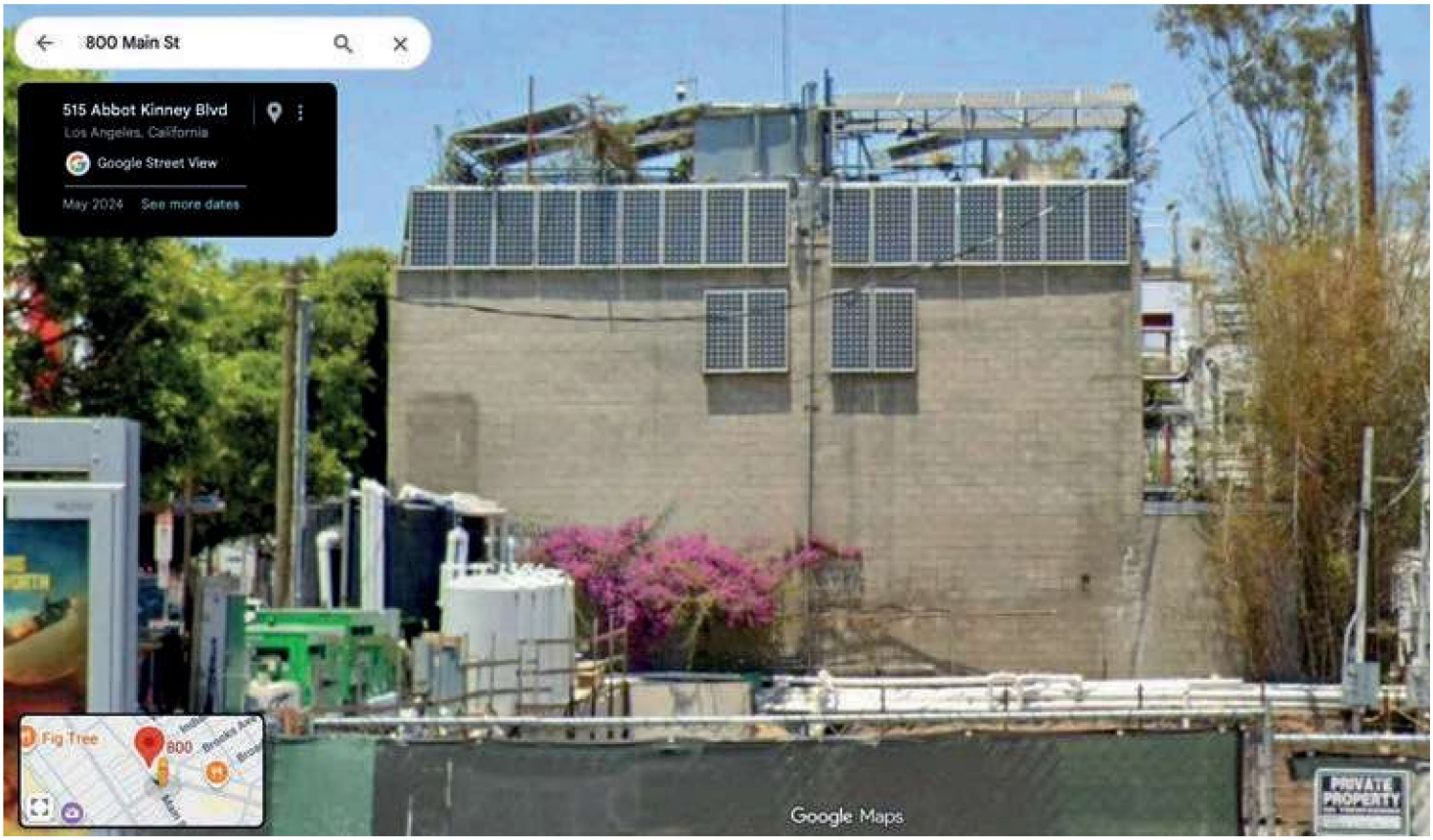
Special Notes	None
Zoning	C2-1-O
Zoning Information (ZI)	ZI-1874 Specific Plan: Los Angeles Coastal Transportation Corridor
Zoning Information (ZI)	ZI-2273 Specific Plan: Venice Coastal Zone
Zoning Information (ZI)	ZI-2452 Transit Priority Area in the City of Los Angeles
Zoning Information (ZI)	ZI-2453 Survey LA - Lost Venice Canals Historic District
Zoning Information (ZI)	ZI-2517 Al Fresco Ordinance within Planning Overlay and/or the Coastal Zone (Ordinance 186073)
Zoning Information (ZI)	ZI-2406 Director's Interpretation of Venice Specific Plan and Small Lot Subdivision Ordinance
Zoning Information (ZI)	ZI-2498 Local Emergency Temporary Regulations - Time Limits and Parking Relief - LAMC 16.02.1
Zoning Information (ZI)	ZI-2512 Housing Element Sites
General Plan Land Use	Neighborhood Office Commercial
General Plan Note(s)	Yes
Minimum Density Requirement	Yes (Citywide)
Hillside Area (Zoning Code)	No
Specific Plan Area	LOS ANGELES COASTAL TRANSPORTATION CORRIDOR
Subareas	None
Specific Plan Area	VENICE COASTAL ZONE
Subareas	North Venice



This is an ugly solar canopy at 800 Main in Venice and this is not 15 ft high.







Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 9:28 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince and staff. I will be forwarding a few more after this one.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Dec 9, 2025 at 9:32 PM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1425 Main Street, Venice
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov

[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Meg Elliott <megelliottx@gmail.com> Wed, Dec 10, 2025 at 12:35 PM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org
Cc: smallstreetsbighearts@gmail.com

Dear Ms. Kuo,

I am writing as a nearby resident to ask City Planning to deny or postpone the proposed project at 1410–1422 Main Street.

Both the LUPC and the Venice Neighborhood Council voted unanimously to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

• Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.
• Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential
historic neighborhood.
• Lot consolidation: A 3-lot consolidation is not permitted.
• Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.
• The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.
• Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
• Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.
• Design: The project fails to “harmonize” Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.
• Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons, I respectfully request that you deny the project or postpone the hearing for the good of our neighborhood.

Thank you for your time and consideration.

Sincerely,

Meg Elliott
220 Horizon Ave

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 2:56 PM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>, Ira Brown <ira.brown@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 12:38 PM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov
E-NEWS

[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

Please Uphold LUPC's Unanimous Denial – 1410–1422 Main Street

1 message

Meg Elliott <melliott@givenco.com> Tue, Dec 9, 2025 at 2:08 PM
To: "board@VeniceNC.org" <board@venicenc.org>, "Sienna.Kuo@lacity.org" <Sienna.Kuo@lacity.org>
Cc: "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>

Dear Venice Neighborhood Council Board Members,

I am writing as a Venice resident to urge you to **uphold the LUPC's unanimous denial** of the proposed development at **1410–1422 Main Street**.

LUPC found the project to be fundamentally out of compliance with the Venice Specific Plan, the Land Use Plan, the Coastal Act, and the Mello Act. Key issues include:

- **Excessive height and massing.** The project proposes **57'10"**, nearly double the **25–30 ft** height limit for this subarea, with an FAR of **2.95** and no required step-back plane.
- **Unsafe reliance on a 14-foot alley for all access.** The alley cannot handle traffic from **19 units, four restaurants, deliveries, trash trucks, rideshare, and pedestrians**, creating significant safety hazards.
- **Three-lot consolidation in violation of the LUP.** The project merges **three lots** without meeting the required findings for such consolidation.
- **Zero usable open space where 2,525 sq ft is required.** This is a complete failure to meet open space and livability standards.
- **Loss of existing coastal housing in violation of the Mello Act.** Two residential structures would be demolished without justification or required findings.
- **Parking and coastal access impacts.** With just **28 spaces**, the project provides inadequate parking for residents, staff, and patrons of four restaurants, pushing demand into surrounding neighborhoods and impacting beach access—an issue of Coastal Act concern.
- **Incompatibility with surrounding homes and historic context.** The massing creates a five-story wall next to 1–2 story residences and the Lost Canals Historic District.
-

Given these substantial inconsistencies with adopted Coastal Zone and community protections, the LUPC's unanimous denial is well-founded.

I respectfully ask you to **affirm LUPC's recommendation** and deny this project.

Thank you for your service to our community.

Sincerely,

Meg Elliott
220 Horizon Ave
Venice, CA 90291

Meg Elliott
Given & Company, Inc.
Tax - Business Management - Trust Administration
3029 Wilshire Boulevard, Suite 200
Santa Monica, CA 90403
Tel: (310) 828-7547
Fax: (310) 828-3604
Email: melliott@givenco.com
Website: www.givenco.com
Click here to securely send files.

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

1 message

Peggy Lee Kennedy <peggylee.kennedy@gmail.com> Wed, Dec 10, 2025 at 4:36 AM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org

I am writing as a life-long Venice resident to ask City Planning to **deny or postpone** the proposed project at **1410–1422 Main Street**.

Both the **LUPC** and the **Venice Neighborhood Council** voted **unanimously** to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

In reviewing the case file, it also appears that the **application submitted by the developer is incomplete or inaccurate**, including:

- No **ZIMAS Parcel Profile Report**, despite being listed as included.
- No required **Change of Use**, even though residential homes would be replaced by multi-level restaurant/commercial uses.
- The application describes "ground floor commercial," but the plans show **restaurants on upper floors**.
- A "**2'–6' alley dedication (TBD)**" is listed with **no engineering plan or justification**.
- A "**special designation**" box was checked with **no supporting documentation**.
- Analyses required for **Coastal Act**, **CEQA**, and the **Venice Specific Plan** are missing because the filing is not complete.
- The developer appears to be improperly invoking **AB 2097** to avoid providing adequate parking, despite proposing multiple restaurant spaces that will rely entirely on a narrow, substandard alley.

Because of these problems the City does not have the basic information required to evaluate the project. Approving only the "shell" and leaving critical details for later would unfairly burden the surrounding neighborhood and create repeated future conflicts.

For these reasons, I respectfully request that you **deny** the project or **postpone** the hearing until a complete and accurate application is submitted.

Sienna Kuo <sienna.kuo@lacity.org>

Thank you for your consideration and time

1 message

Rick Garvey <rickgarvey@hotmail.com> Wed, Dec 10, 2025 at 2:22 PM
To: Sienna Kuo <sienna.kuo@lacity.org>
Cc: "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>

Hi Ms. Kuo,

I just wanted to send you a quick note to thank you for the time and consideration you are giving to our concerns about 1410-1422 Main.

Tony Russo referenced some recent studies that are not currently posted as part of the file (that I can see on the website). If I am just not seeing them, would you kindly direct me to where they can be found so we can review them? We as neighbors would really appreciate it.

If you have any questions for us, please let me know and I will spread the word.

Best regards,
Rick

Rick Garvey, 234 Horizon #5, Venice, Ca. 90291

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

2 messages

Rick Garvey <rickgarvey@hotmail.com> Tue, Dec 9, 2025 at 11:54 PM
To: Sienna Kuo <sienna.kuo@lacity.org>
Cc: Juliet Oh <Juliet.Oh@lacity.org>, Vince Bertoni <vince.bertoni@lacity.org>, "ira.brown@lacity.org" <ira.brown@lacity.org>, "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>, Rick Garvey <rickgarvey@hotmail.com>

Dear Ms. Kuo,

My name is Rick Garvey. I have lived 250 feet east of the proposed project for 30 years, and my front door opens onto Toledo Court, the alley the applicant proposes to use for all ingress/egress. I did not receive notice of this hearing and learned of it only through a neighbor. Given that this is the third time since 2014 that I have opposed an iteration of this project, I find the lack of noticing troubling.

I respectfully request that City Planning **deny or postpone** the proposed project at **1410–1422 Main Street**.

Both the **LUPC** and the **full Venice Neighborhood Council** voted **unanimously** to oppose the project due to major unresolved issues related to height, mass, parking, alley safety, neighborhood compatibility, and overall feasibility. Their attached letter outlines nine detailed findings, all of which I agree with and are reason enough to deny this project.

After losing at LUPC, the applicant met with neighbors **only today**, the day before the hearing. When asked why she abandoned the previous, smaller project (9 units + 1 commercial space) in favor of a far larger proposal, she claimed she was encouraged by members of your office to pursue a dense mixed-use project as part of a "revitalization of Venice." If accurate, this would be highly inappropriate. However, given the applicant's inconsistent statements throughout this process, I am willing to give your office the benefit of the doubt.

More importantly, the **application filed with the City is incomplete and contains material inaccuracies.**

- **No ZIMAS Parcel Profile Report**, despite being checked off as included.
- **No required Change of Use**, even though the site contains two homes and the proposal converts the property to multi-story restaurant/commercial uses.
- The application claims **"ground floor commercial"**, but the plans show restaurants on the **upper floors**.
- A **"2'–6' alley dedication (TBD)"** is listed with **no engineering plan, no justification, and no right-of-way analysis**.
- The "**special designation**" box was checked with **no supporting documentation**.
- Multiple analyses required for Coastal Act, CEQA, and Venice Specific Plan compliance are **absent** because the basic filing is incomplete.

· The applicant is improperly invoking **AB 2097**, despite proposing multiple restaurant spaces that will clearly overwhelm neighborhood parking and rely entirely on a substandard alley.

Because the application is incomplete, inaccurate, and fundamentally misrepresents the project, **the City does not have sufficient information to evaluate the proposal** under required laws and policies. The developer's representative has repeatedly said that he just wants to get the shell approved and that the details of the interior will be determined at a later time. This is not fair to us in the neighborhood and requires that we have to continue to battle with them again and again. Perhaps he hopes that people's attention can wane or people can be worn down. Do not let him get away with this strategy.

Given these defects — combined with unanimous community and VNC opposition — the only appropriate action is to **deny or postpone** the project until a complete and accurate application is submitted.

Thank you for your time and attention.

Sincerely,
Rick Garvey
234 Horizon Avenue #5
Venice, CA 90291

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 9:30 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 5:12 AM
Subject: Fwd: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov



[Quoted text hidden]

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

Sienna Kuo <sienna.kuo@lacity.org>

DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Rick Garvey <smallstreetsbighearts@gmail.com> Wed, Dec 10, 2025 at 11:42 AM
To: Sienna.Kuo@lacity.org, Juliet.Oh@lacity.org, Vince.Bertoni@lacity.org, Ira.Brown@lacity.org
Cc: Rick Garvey <smallstreetsbighearts@gmail.com>

Dear **Ms. Kuo**,

I am writing as a nearby resident to ask City Planning to **deny or postpone** the proposed project at **1410–1422 Main Street**.

I think it is important that you have some visuals of the alley that will be greatly impacted so I am attaching a slide deck we presented at the Venice Neighborhood Council last night.

I hope it will be helpful in your determination, and I hope you will deny this project.

Best regards,
Rick Garvey
234 Horizon #5
Venice, CA 90291

12.9.25_VNC_1410-1422_draft_2.pptx

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 12:06 PM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Sienna Kuo <sienna.kuo@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

[Quoted text hidden]

Please DENY the proposed development at 1410-1422 Main Street: CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

1 message

Rick Garvey <rickgarvey@hotmail.com> Mon, Dec 8, 2025 at 11:52 AM
To: "board@venicenc.org" <board@venicenc.org>
Cc: "Sienna.Kuo@lacity.org" <Sienna.Kuo@lacity.org>, Rick Garvey <rickgarvey@hotmail.com>

Dear Venice Neighborhood Council Board Members,

I am writing as a Venice resident to respectfully urge you to uphold the Land Use and Planning Committee's unanimous denial of the proposed development at 1410–1422 Main Street. The LUPC reached its decision after extensive review and found that the project is deeply out of compliance with the Venice Specific Plan, the certified Land Use Plan, the Coastal Act, and the Mello Act. Key findings include:

1. Unsafe and inadequate alley access

The project forces all vehicle access, loading, trash, and deliveries onto a 14-foot non-conforming alley that cannot safely handle the increased traffic from 19 units, four restaurants, rideshare activity, trash trucks, and delivery vehicles. The LUPC found that this creates unsafe conflicts with pedestrians, cyclists, children, and people with mobility devices.

2. Excessive height, mass, and FAR

The project proposes a height of 57 feet 10 inches, nearly double the 30-foot height limit for this subarea of the Venice Coastal Zone. It also seeks an FAR of 2.95, almost double the allowed 1.5 FAR, and eliminates the required 45-degree step-back plane, creating a five-story wall against 1–2 story homes.

3. Unlawful three-lot consolidation

The Venice LUP allows a maximum of two-lot consolidation (three only with special conditions the applicant does NOT meet). The project illegally consolidates three lots, while failing the exception tests regarding neighborhood compatibility and adequate on-site parking.

4. Total lack of required usable open space or green space

The applicant is requesting a 100% reduction in usable open space—zero square feet where 2,525 square feet is required. This is a complete failure to meet Specific Plan and Coastal Act standards intended to ensure livability, light, air, and access to outdoor space.

5. Violation of the Mello Act

The project demolishes two existing residential structures and replaces them with a predominantly commercial project. The Mello Act prohibits demolition or conversion of residential units into non-residential uses unless the City first proves residential use is infeasible, which has not been demonstrated. This project would create unlawful loss of coastal housing.

6. No public setback or pedestrian realm on Main Street

The project removes the required 5-foot front yard setback, providing no space for trees, landscaping, or pedestrian refuge. This creates a tall, bulky façade directly at the sidewalk and undermines the pedestrian environment of Main Street.

7. Significant adverse impact on coastal access and parking

The applicant seeks substantial parking reductions while adding high-intensity restaurant uses. With only 28 spaces, the project will push parking demand into already overburdened public streets relied upon for beach access—an impact the Coastal Act explicitly prohibits. LUPC also noted that the traffic analysis omitted the restaurant uses, artificially understating project trips.

8. Incompatibility with surrounding historic and residential character

The project creates a five-story mass towering over adjacent 1–2 story homes and the Lost Venice Canals Historic District, with no meaningful transition. This conflicts with Coastal Act requirements to protect the unique visual and community character of Venice.

Given the project's extensive violations of height limits, massing standards, open space requirements, coastal access policies, housing protection laws, and basic life-safety provisions, the LUPC was correct in recommending denial.

I respectfully urge the Board to affirm the LUPC's unanimous denial and protect the safety, character, and livability of our community.

Thank you for your time and dedication to Venice.

Sincerely,
Rick Garvey

234 Horizon Avenue #5, Venice, CA 90291

Sienna Kuo <sienna.kuo@lacity.org>

1410-1422 Main Street PLEASE DENY

1 message

Robin Murez <robinmurez@gmail.com> Tue, Dec 9, 2025 at 7:10 PM
To: Sienna.Kuo@lacity.org
Cc: "board@venicenc org" <board@venicenc.org>

Dear Sienna,

The first home I owned in Venice was 221 Market Street. It is just around the corner from 1410-1422 Main. It shares the undersized alley at the T.

I remember when a project was proposed for this site, years ago. It was overwhelmingly opposed by neighbors and the whole community.

This new iteration is ever more egregious. It looks like they've found every possible loop hole to create an ever more unsafe and imposing development.

Our 120 year old infrastructure cannot support it!

All of the concerns raised by neighbors are completely accurate. This includes without limitation:

The alley is far too narrow and heavily utilized to handle the buildings parking access. Trash trucks barely make it through. Only one car can pass at a time.

Five restaurants would have far too many deliveries, noise, smells, and long hours (prep and clean up with clanking dishes) for this location.

Combining 3 lots opposes the Venice Specific Plan and creates too much mass.

Reducing setbacks also makes it far too imposing and dangerous.

Private rooftops cannot be considered at "open space." Any reasonable notion of open space is garden, ground level.

Even those who always advocate for increased density, oppose this project.

It's a sham, a grift, a slap in the face to anyone who lives or wants to live or visit Venice.

For the love of Venice, please oppose this project.

Sincerely,

Robin Murez

Robin Murez
robinmurez@gmail.com
310 709-7826

Sienna Kuo <sienna.kuo@lacity.org>

VNC recommendation letter 1410-1414-1422 Main Street

1 message

Robin Rudisill <robin.rudisill.vnclupc@gmail.com> Tue, Dec 9, 2025 at 9:20 PM
To: Sienna Kuo <sienna.kuo@lacity.org>
Cc: Brian Averill <brian.averill@venicenc.org>, Mark Mack <mark.mack@venicenc.org>, "Shannon@Coastal Vaughn" <shannon.vaughn@coastal.ca.gov>, "Ziff, Dani@Coastal" <Dani.Ziff@coastal.ca.gov>, Craig Bullock <craig.bullock@lacity.org>, Jeff Aldrich <jeff.aldrich@wbr.com>, Sean Silva <sean.silva@lacity.org>, Ira Brown <ira.brown@lacity.org>, Tony Russo <tony@crestrealestate.com>, Nick Leathers <nick@crestrealestate.com>

Sienna,

Enclosed are the VNC recommendation letter and LUPC Staff Report for 1410-1414-1422 Main St, case No. **CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF.**

Best,
Robin Rudisill
Vice Chair/Secretary
Land Use & Planning Committee
Venice Neighborhood Council

2 attachments

VNC recommendation letter 1410-1414-1422 Main St 12.9.pdf
139K

1410 Main LUPC Staff Report 12.9.25.pdf
8145K

Sienna Kuo <sienna.kuo@lacity.org>

Comment in Support of 1410 South Main Street Project

1 message

Stephanie Dunn <spapayanis@gmail.com> Sat, Dec 6, 2025 at 4:39 PM
To: sienna.kuo@lacity.org

Dear Sienna Kuo:

I am writing to express my strong support for the proposed mixed-use development in the Venice neighborhood at. 1410 South Main Street. Los Angeles is in a severe housing shortage, and we urgently need projects like this to increase the city's housing supply and provide more opportunities for people to live in vibrant, walkable communities.

This project represents exactly the type of thoughtful development that can help address our regional housing crisis. By adding new homes—along with retail and community-serving spaces—it will contribute to a more sustainable, dynamic, and economically healthy Venice. The neighborhood has tremendous potential, and well-planned mixed-use projects like this help activate the area, support local businesses, and make Venice a more inclusive place to live.

I understand that some residents may express concerns regarding traffic, views, or change to the existing streetscape. However, Los Angeles cannot meaningfully address its housing crisis if we continue to block needed housing based on subjective or speculative concerns. Responsible development, especially near jobs, transit, and established infrastructure, is essential for the future of our city and for meeting our state housing goals.

I urge the City to move this project forward and continue supporting high-quality housing and mixed-use development throughout Los Angeles. We need to build more homes—not fewer—if we want a sustainable, equitable, and thriving city.

Thank you for your time and consideration.

Stephanie Dunn

Sienna Kuo <sienna.kuo@lacity.org>

Subject: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St

2 messages

Steve Bevilacqua <emb233@yahoo.com> Wed, Dec 10, 2025 at 10:26 AM
To: "Sienna.Kuo@lacity.org" <sienna.kuo@lacity.org>, "Juliet.Oh@lacity.org" <juliet.oh@lacity.org>, "Vince.Bertoni@lacity.org" <vince.bertoni@lacity.org>, "Ira.Brown@lacity.org" <ira.brown@lacity.org>

Dear Ms. Kuo,

I am writing as a nearby resident to ask City Planning to deny or postpone the proposed project at 1410–1422 Main Street.

Both the LUPC and the Venice Neighborhood Council voted unanimously to oppose the project because of unresolved concerns about height, mass, parking, alley safety, and neighborhood compatibility. I strongly agree with their findings and urge the City to take them seriously.

There are many families on this block with children, and this development will have a severely negative impact on their lives. We don't need the restaurants and the bar on that corner. It will add to traffic, congestion, noise, and obviously drinking and intoxicated people coming and going. We also don't need restaurant patrons and employees looking for parking spaces on an already crowded street, and then leaving the place, possibly after drinking. The rideshares, delivery trucks, additional trash pickups, as well as trucks and patrons parking in the center lane on Market Street – all of these things pose a safety risk to the kids and families in this neighborhood.

In addition, there are these following issues:

• Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.
• Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential
historic neighborhood.
• Lot consolidation: A 3-lot consolidation is not permitted.
• Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.
• The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.
• Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
• Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.
• Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.
• Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

For these reasons, I respectfully request that you deny the project or postpone the hearing for the good of our neighborhood.

Thank you for your time and consideration of this matter.

Best regards,
Steve Bevilacqua
248 Market Street

Flora Melendez <flora.melendez@lacity.org> Wed, Dec 10, 2025 at 10:30 AM
To: Theodore Irving <theodore.irving@lacity.org>
Cc: Sienna Kuo <sienna.kuo@lacity.org>, Ira Brown <ira.brown@lacity.org>, Juliet Oh <Juliet.Oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
planning.lacity.gov

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Dec 10, 2025 at 10:30 AM
Subject: Fwd: Subject: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF – 1410–1422 Main St
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP

Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 525-C
Los Angeles, CA 90012
T: (213) 978-1271
planning.lacity.gov



[Quoted text hidden]

Sienna Kuo <sienna.kuo@lacity.org>

1410–1422 Main Street

1 message

Steve Bevilacqua <emb233@yahoo.com> Mon, Dec 8, 2025 at 2:23 PM
To: "board@venicenc.org" <board@venicenc.org>, "Sienna.Kuo@lacity.org" <sienna.kuo@lacity.org>

Dear VNC:

My name is Steve Bevilacqua, I live on the 200 block of Market Street, very close to the proposed development at 1410-1422 Main Street. I urge you to please follow the unanimous recommendation of LUPC and deny this project.

There are many major problems with this proposed development. It is too big and will be extremely disruptive to the neighborhood. At the recent LUPC meeting, the developers cited their study claiming that their 19 condos, 4 restaurants, offices, and a bar will result in 86 additional car trips per day. I find this claim to be unrealistic, at best. With Horizon being a one-way street, and the only entrance to the parking in the alley, there will be a lot of circling the block as people try to navigate the alley, which is barely wide enough for two cars to pass, and is lined with dumpsters and trash receptacles.

(As I write this, our electricity just went out due to the already overburdened power grid here. This happens frequently and this oversized development will only add to this problem.)

The developers also cited their self-made study which claims that, at any given time, there are 200-400 empty parking spots on the streets in the immediate vicinity of 1410 Main Street. This claim is absurd and I invite everyone to come by and see the parking situation in person. Not only do residents park on these streets, but the employees of Hama Sushi and Great White park here every day. The developer has made no mention of where the employees of these 4 new restaurants, the offices, and the bar will park There are only 20 parking spaces included in the plans for this development, and they are tandem spots which require constant attendants.

My main point is this: There are many families on this block with children, and this development will have a severely negative impact on their lives. I have a daughter. There's a family with three kids right across the street from this site. A family with two kids lives in between us. The family across the alley has a toddler and another baby on the way, and there are other families with children around here. A lot of these kids are friends. They hang out and play together. They ride bikes and skateboard and go from house to house. It's a street of families. We don't need the restaurants and the bar on that corner. It will add to traffic, congestion, noise, and obviously drinking and intoxicated people coming and going. There are bars a couple blocks away in every direction. We don't need this one. We also don't need people looking for parking spaces on an already crowded street, and then leaving the place after drinking. The rideshares, delivery trucks, additional trash pickups, as well as trucks and patrons parking in the center lane on Market Street – all of these things pose a safety risk to the kids and families in this neighborhood.

This development has too many units, too many liquor establishments, too few parking spaces. This developer has been proven to be extremely antagonistic and hostile to the neighbors at every step along the way. I was once yelled at "fucking move" by the developer's friends at a neighborhood meeting. It doesn't speak well of their intent regarding neighborhood relations. Also, the fact that they failed to notify so many of the neighbors about their city hearing on Wednesday speaks to their continued untrustworthiness.

I ask the VNC to think of the families who live on these streets, and I urge you to please follow LUPC's unanimous decision to deny this proposed development.

Thank you very much for your time, and for all you do for the Venice community.

Best regards,
Steve Bevilacqua
248 Market Street

Sienna Kuo <sienna.kuo@lacity.org>

Request to Uphold Unanimous LUPC Denial of 1410–1422 Main Street

1 message

Steve Day <steve@hillsartists.com> Tue, Dec 9, 2025 at 11:19 AM
To: "board@venicenc.org" <board@venicenc.org>
Cc: "Sienna.Kuo@lacity.org" <Sienna.Kuo@lacity.org>, "smallstreetsbighearts@gmail.com" <smallstreetsbighearts@gmail.com>

To Council Board Members,

I am writing as a Venice resident of 5 years (232 Horizon Ave. #4), who has enormous concerns regarding the proposed development at 1410–1422 Main Street and to urge you to uphold the LUPC's unanimous denial of the proposal!

LUPC found the project fundamentally out of compliance with the Venice Specific Plan, the Land Use Plan, the Coastal Act, and the Mello Act, with Key issues including:

- **Consolidation of lots in violation of the LUP:** The project merges three lots without meeting the required findings for such consolidation.

- **Reliance on a 14-foot alley for all access:** The alley cannot handle traffic from 19 units, four restaurants, deliveries, trash trucks, ride-share, and pedestrians, creating significant safety hazards.

- **Excessive height and massing:** The project proposes 57'10", nearly double the 25–30 ft height limit for this subarea, with an FAR of 2.95 and no required step-back plane.

- **No usable open space:** 2,525 sq ft is required demonstrating a complete failure to meet open space and livability standards.

- **Violation of the Mello Act**. Loss of existing coastal housing in the form of two residential structures that would be demolished without justification or required findings.

- **Impact on parking and coastal access**. With just 28 spaces, the project provides inadequate parking for residents, staff, and patrons of four restaurants, pushing demand into (already overused / impacted) surrounding neighborhoods and beach access—an issue of Coastal Act concern.

These significant inconsistencies with the adopted Coastal Zone and community protections concisely demonstrate that the LUPC's unanimous denial is well-founded. I (and many others) respectfully ask you to affirm LUPC's recommendation and deny this project.

Many thanks for your service to our wonderful community,

Steve Day
Hills Artists
Los Angeles | London
steve@hillsartists.com
+1 254 433 0191

Venice Neighborhood Council
LAND USE AND PLANNING COMMITTEE
PO Box 550, Venice, CA 90294 | www.VeniceNC.org
Email: Chair-LUPC@VeniceNC.org

Land Use & Planning Committee (LUPC)
STAFF REPORT--DRAFT
December 4, 2025

City Case No:	**CPC-2021-2020-DB-CDP-SPPC-MEL-HCA**
CEQA Case No:	**ENV-2021-2021-EAF: Categorical Exemption under CEQA sections 15301 (Class 1) and 15332 (Class 32)**
Related City Case No(s):	**CPC-2013-2377-DB-CDP-SPP-MEL**
Address of Project:	**1410-1414-1422 Main Street**
Applicant/Property Owner:	**Three on the Tree LLC**
Applicant's Representative:	**Tony Russo, Crest Real Estate**
Standard of Review:	**Coastal Act, with certified Land Use Plan (LUP) as guidance (for CDPs) Venice Community Plan Other applicable State laws: Assembly Bill 2097 Other applicable City laws: ADU ordinance Mello Act & Housing Crisis Act**
Coastal Zone:	**Single Permit Jurisdiction**
City Hearing:	**December 10, 2025, 1 pm**
Email for City Planner:	**Sienna.Kuo@lacity.org**
LUPC Staff assigned:	**Robin Rudisill & Mark Mack**

I. Detailed Project Description:

Demolition of 2 single-family dwellings, and the construction of a 26,845 SF, 5-story mixed-use building on 3 lots, consisting of 19 residential units, of which 4 residential units will be set aside for Very Low Income (VLI) Households; 6,152 SF of restaurant uses including 3,177 SF of indoor dining Service Floor Area and 467 SF of outdoor dining Service Floor Area; 656 SF of office uses and a roof deck with a solar trellis and a roof access structure, providing 28 parking spaces within a one level subterranean garage.

II. **Motion 1:**

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

Moved: Mark Mack
Seconded:
Vote: X-X-X (X absent, X recused)

III. **Motion 2:**

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be over exposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.
.
7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.
The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.
The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10' minimum. The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-

foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.
The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.
The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.
The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone

Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.
The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Moved: Mark Mack
Seconded:
Vote: X-X-X (X absent, X recused)

IV. Motion 3:

The Venice Neighborhood Council strongly recommends that the project be confined to 100% residential, within the development standards and policies of the Venice Specific Plan and LUP, which would: provide homes, be compatible with the surrounding residential neighborhood character, not create the

significant adverse impacts and nuisances on the surrounding residential neighborhood that commercial businesses would, and not violate the state Mello Act.

Moved: Mark Mack
Seconded:
Vote: X-X-X (X absent, X recused)

Reason for VNC/LUPC hearing this project:

1. The project that was applied for in 2021 differs greatly from the significantly changed current version of the project in scope, height, use and parking:

1.1 Scope: The initial project consisted of street level restaurant of .....SF, a two level underground parking garage with ..... parking spaces and … dwelling units.

The current proposal consists of a street level restaurant of .....SF and a second and 3rd level restaurant space, a one level underground parking garage with ..... parking spaces and 24 dwelling units, as well as a solar roof structure on 4 above ground levels of a height of ...feet.

1.2. Height: The newly proposed project far exceeds the height and setbacks for a project immediately adjacent to low-rise dwellings, impacting the living quality of the surrounding neighborhood dwellings and streetscape.

1.3. Use: The project now proposes mixed-use commercial grade occupancy on the second and third level of the structure, overlooking and adjacent to neighboring low-rise residential buildings.

1.4. Parking and access: The current proposal provides .. tandem parking spaces for ...SF of residential and …. sf of commercial use.

The prior proposal provided 2 level of underground parking with …parking spaces for ...SF of residential and .... SF of commercial use.

The current proposal accesses the parking level from a residential side very narrow alley rather than from Main Street as was requested in a motion of the prior VNC Board.

2. Open Space and Setbacks: The current project lacks proper open space requirements and proper setbacks.

3. Green space: The current project lacks green space, trees and sidewalk accommodations.

4. Outreach: The project representative has failed to inform the neighborhood, LUPC and the VNC of its changed scope and impact on the neighborhood. They have not conducted proper neighborhood outreach necessary for this size and scope of project, causing a strong neighborhood resistance to the project.

Therefore, the Venice Neighborhood Council has scheduled a LUPC hearing (December 4th) and a Special VNC Board hearing (December 9th) in order to assess the significantly changed project and the impact it presents to the neighborhood.

I. Findings re. Entitlements:

For your use in determining the entitlements, here is the link to the City Planning Prefix (approving entity) and Suffix (entitlements) Report where you can look up the City Case No. coding abbreviations:
https://planning.lacity.gov/resources/prefix-suffix-report

A. Coastal Development Permit (CDP)—Coastal Act & certified Land Use Plan (LUP) are standard of review

TO DO

1. Protection of Special Coastal Communities

Coastal Act section 30253(e) states: *New development shall do all of the following…(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

LUP Policy Preservation of Venice as a Special Coastal Community states:

Preservation of Venice as a Special Coastal Community	**Policy I. E. 1. General.** Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.
	Policy I. E. 2. Scale. New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect

Policy I. E. 3. Architecture. Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

The project is located in the Lost Venice Canals Historic District:



B. **Density Bonus Act (DB)(if applicable: yes_X__/no___)**

1. **The "Major Transit Stop" qualifying the project is at XXX**

2. **With 4 Very Low Income (VLI) units, the project qualifies for 4 incentives (unlimited waivers of development standards is allowed).**

The following Density Bonus incentives are requested:

1. **Off Menu request for a Floor Area Ratio (FAR) increase of 96.6 percent resulting in a FAR of 2.95, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3.**
2. **Off Menu request for a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.**
3. **Off Menu request for a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.**
4. **a zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a).**

The following Waivers of Development Standards are requested:

1. **Maximum building height of 57 feet 10 inches, in lieu of 30 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3;100% decrease in usable open space from 2,525 square feet required.**
2. **Remove the step back provisions, in lieu a 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F(3)(a).**
3. **Permit a Roof Access Structure with a maximum height of 15 feet in lieu of 10 feet, as otherwise required pursuant to the Venice Coastal Zone Specific Plan Section 9.C.**
4. **Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.**

TO DO

C. **Mello Act (MEL)(if applicable: yes_X__/no___)**

This project violates the Mello Act. The Mello Act state law protects housing in the Coastal Zone. The purpose of the Mello Act is three-fold: *to maintain existing residential structures*, to protect existing affordable *units*, and to provide new affordable housing in new developments. The law states:

> **"The conversion or demolition of any residential structure for purposes of a nonresidential use which is not coastal dependent...shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."**

The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects, projects just like this one.

The legal, permitted use for the existing structures is residential. Thus, these residential structures are protected by the Mello Act and any project for these properties must be residential use only. The Mello Act state law does not distinguish between zones, it protects all residential structures and affordable units, regardless of what zone they are in.

The Mello Act was promulgated to avoid this very thing—housing in the coastal zone being turned into more lucrative commercial uses, just like this project.

Prior VNC letters for same/similar location:

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

June 23, 2021

By email
Bindu Kannan bindu.kannan@lacity.org

Dear Bindu Kannan:

Please be advised that at a regular public meeting of the Venice Neighborhood Council (VNC) Board of Officers held on June 15, 2021, the following Land Use Planning Committee (LUPC) motion was approved.

Project Description: 1410 -1422 Main Street APCW-2021-2020-CDP-MEL-SPE-SPP-WDI. Demolition of the (2) existing single family dwellings and the construction of a new 3-story mixed use building (commercial + 9 new dwelling units) and a 2-story basement garage on (3) lots.

MOTION: The Venice Neighborhood Council recommends approval of the project with the following conditions:

1. Remove the underground mechanical room
2. Make the entrance/exit the project on Main Street, and the loading zone on Main Street. City to stripe the pavement accordingly.
3. Deliveries not prior to 8am and not after 8pm
4. Applicant to clarify whether the solar structures as proposed are compliant with city code and/or mandated by State law

ACTION

it was approved by a vote of 12-5-1.

Respectfully submitted,

Ira Koslow
President
Venice Neighborhood Council
www.venicenc.org

It's YOUR Venice - get involved!

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

April 21, 2014

Linn Wyatt
Chief Zoning Administrator
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012-2601

Case Number: CPC-2013-2377-DB-CDP-SPP-MEL
Project: 1414 Main Street, Venice 90291
Description: Density Bonus (Off-Menu) with 5 incentive requests, SPP, CDP, Mello Act compliance review to develop a 46-feet/4-stories, 91,968 square foot, mixed-use development.

To Linn Wyatt,

Please forward the **DENIAL** of the proposed project to the appropriate Zoning Administrator for this project once that person is assigned. This will advise that at a regularly held public meeting of the Venice Neighborhood Council's (VNC) Board of Officers on March 18, 2014, it was moved and passed by the Venice Neighborhood Council as follows:

MOTION:
The Venice Neighborhood Council recommends DENIAL of the project as presented based on:
- Excess of off-menu affordable housing density bonus incentives (five vs. three that are specified by SB 1818).
- Inconsistency with the character, mass, and scale of the surrounding neighborhood
- The applicant's failure to show that the off-menu incentives are necessary to make the housing units economically feasible (especially in lieu of cost to develop 89 excess parking spaces).
- Excessive FAR.
- Danger of extremely poor circulation with the parking entrance onto alleyway Toledo Court (except for residences and employees).
- Excessive lot consolidation.
- Missing transportation demand management strategy.
- Unaddressed historic preservation issues.

ACTION: Motion made by Ira Koslow, seconded by Marc Saltzberg. Motion to DENY the project approved 14-1-1

Photos of existing:

Alley – from south

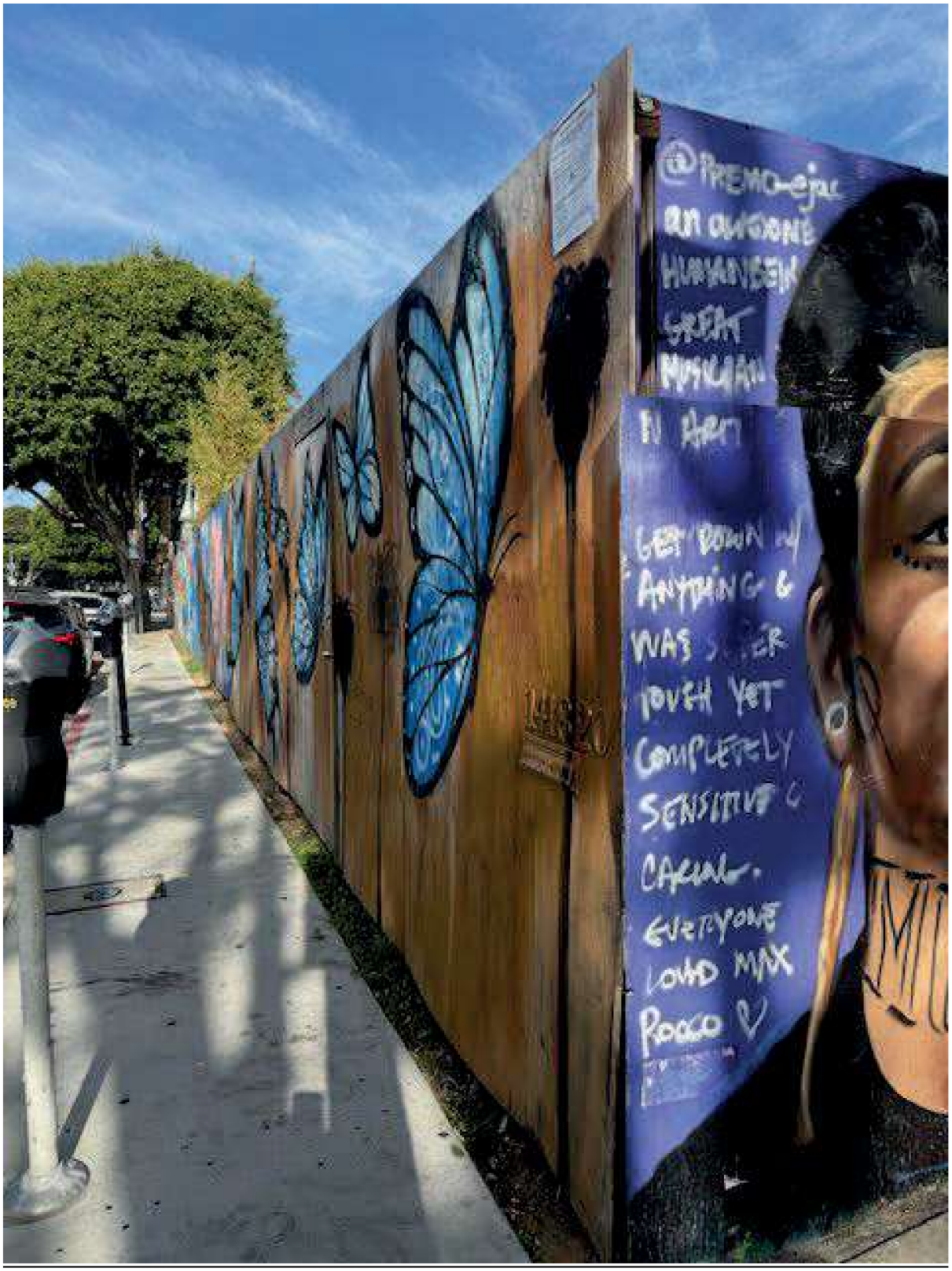


Alley – from North



Main Street




GREAT
MUSICIAN
GET DOWN W/
ANYTHING &
TOUGH YET
COMPLETELY
SENSITIVE &
CARING.
EVERYONE
LOUD MAX
POOCO

3 lots from Alley




MUCK
ROCK



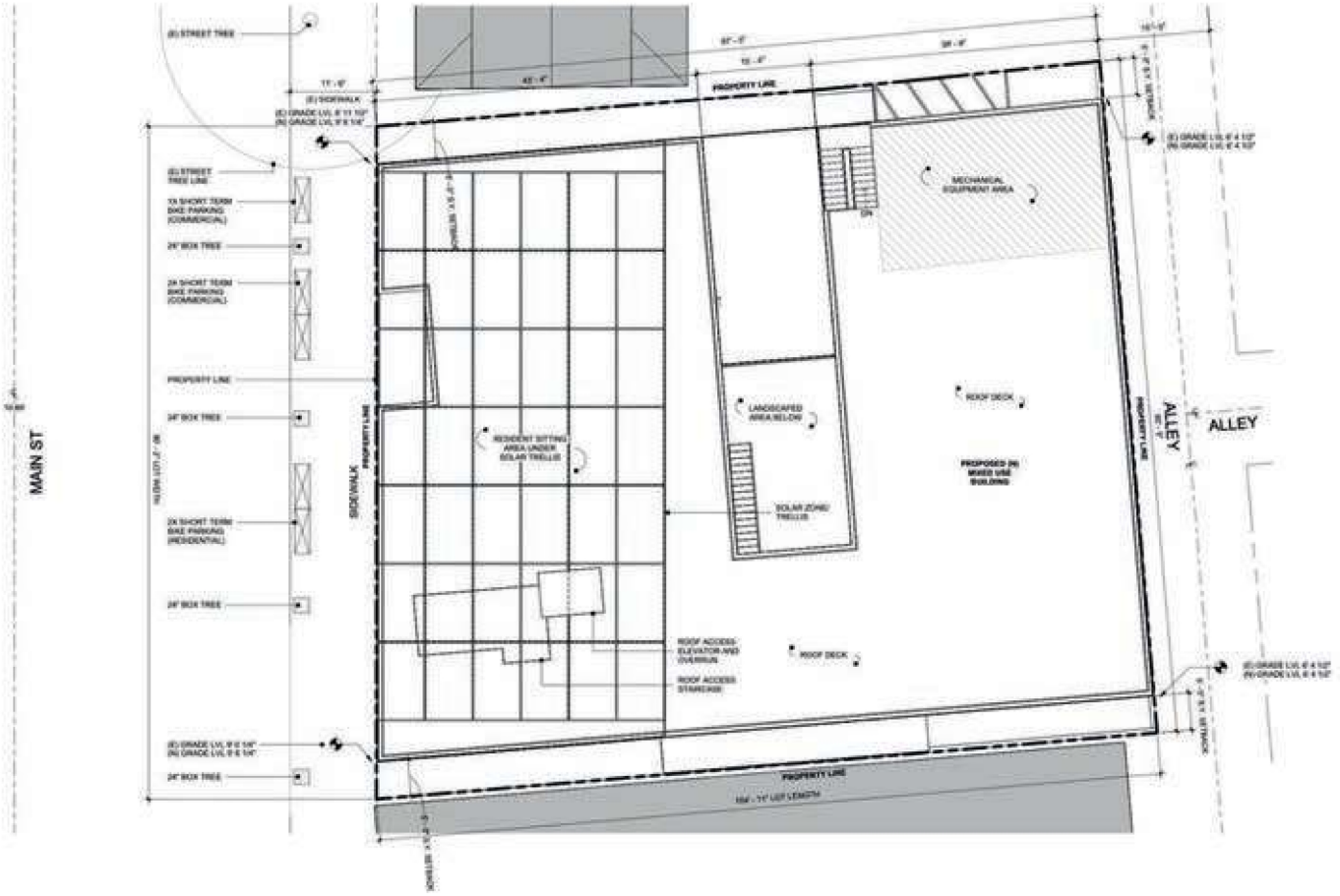


I. Existing Site Plan:

II. **Renderings of proposed**

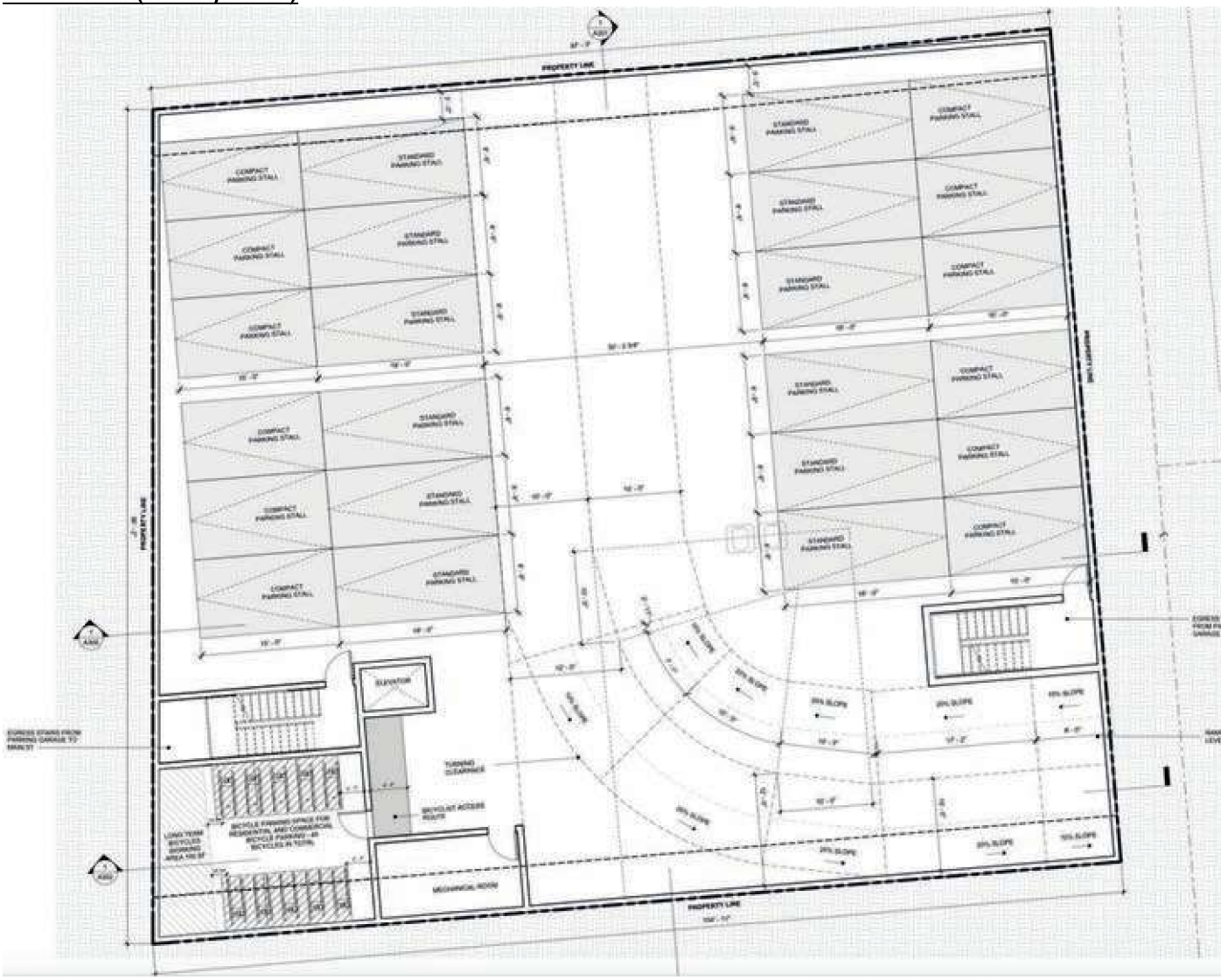
None available.

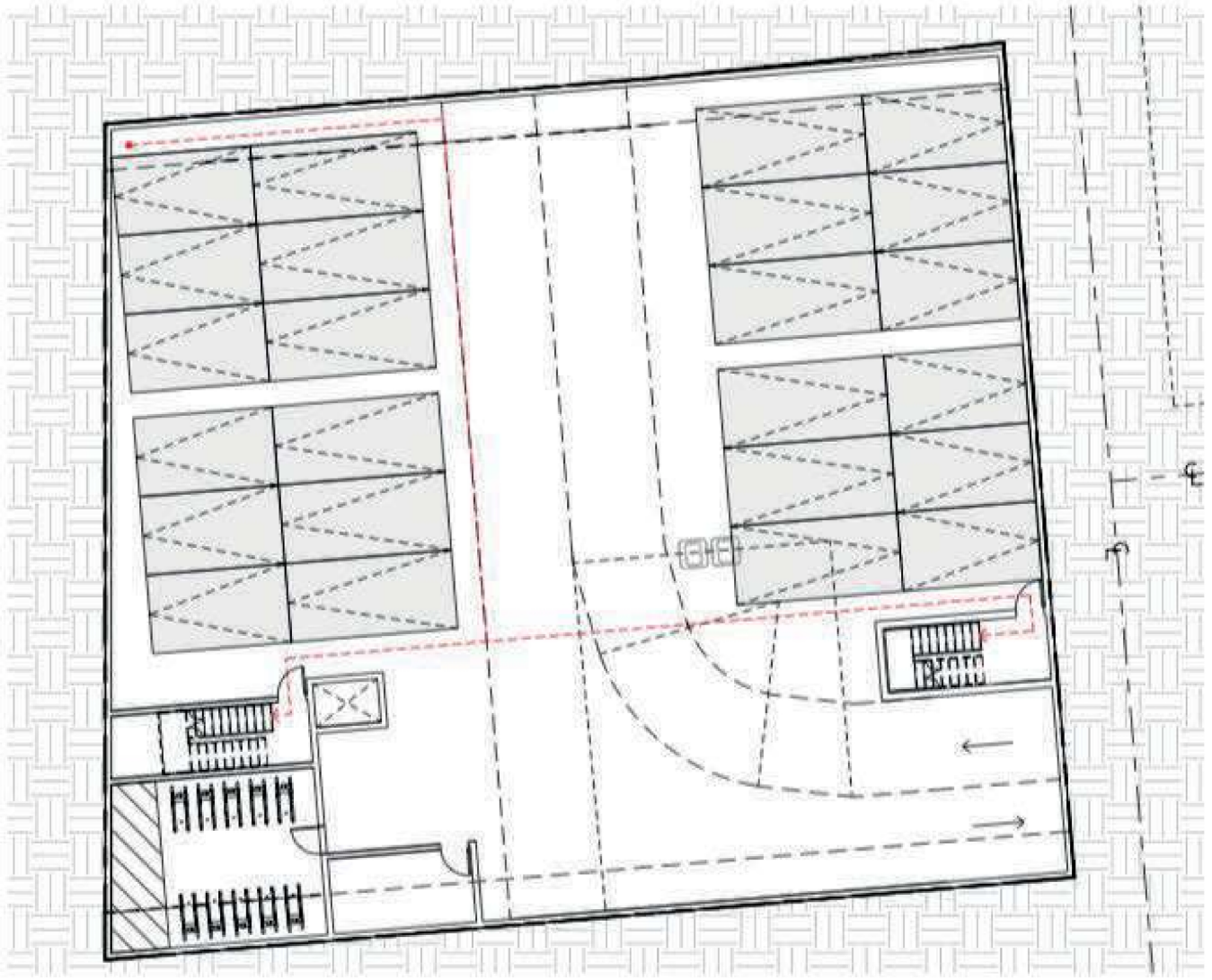
III. Site Plan:



IV. Floor Plans (detail/color)

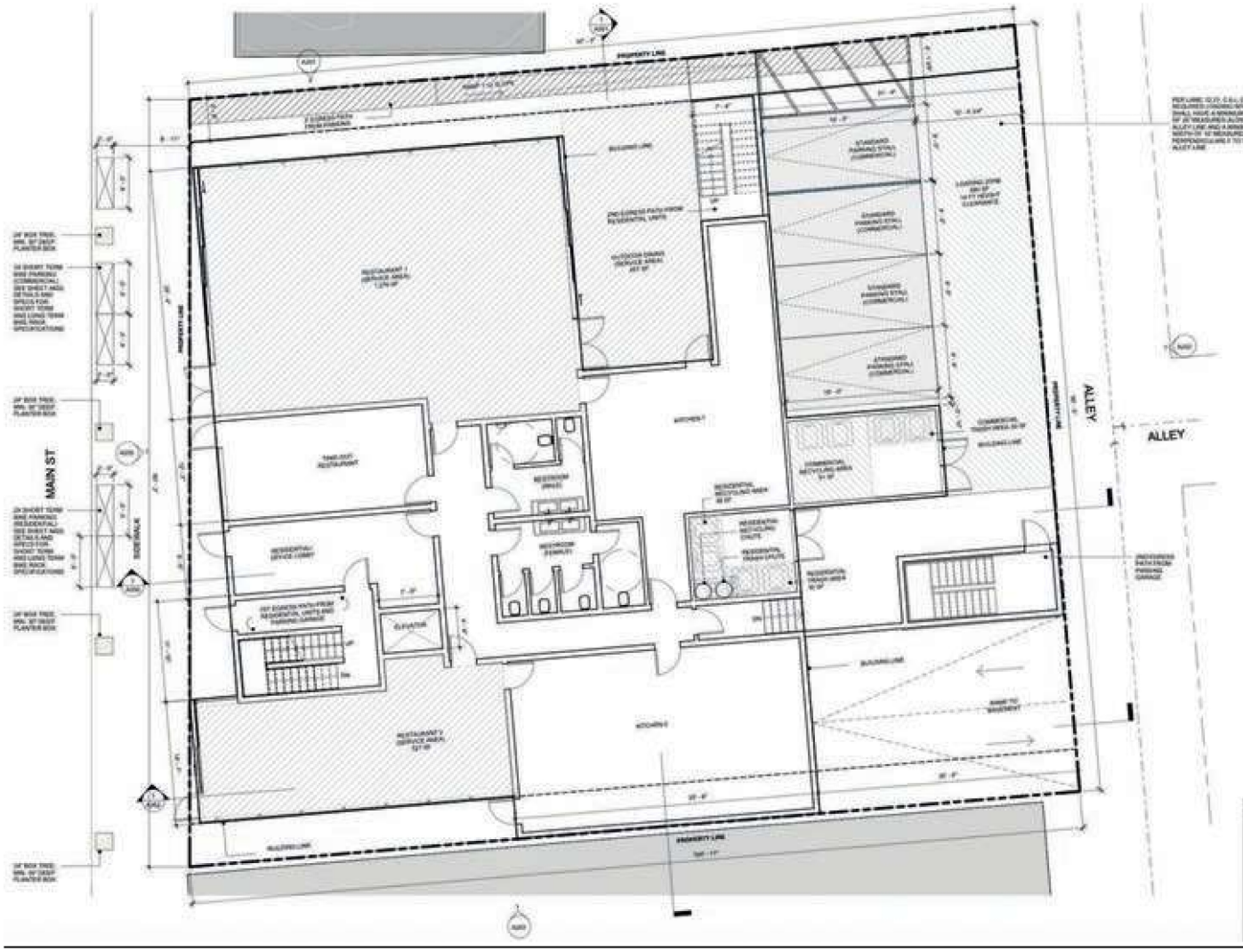
Basement (detail/color)





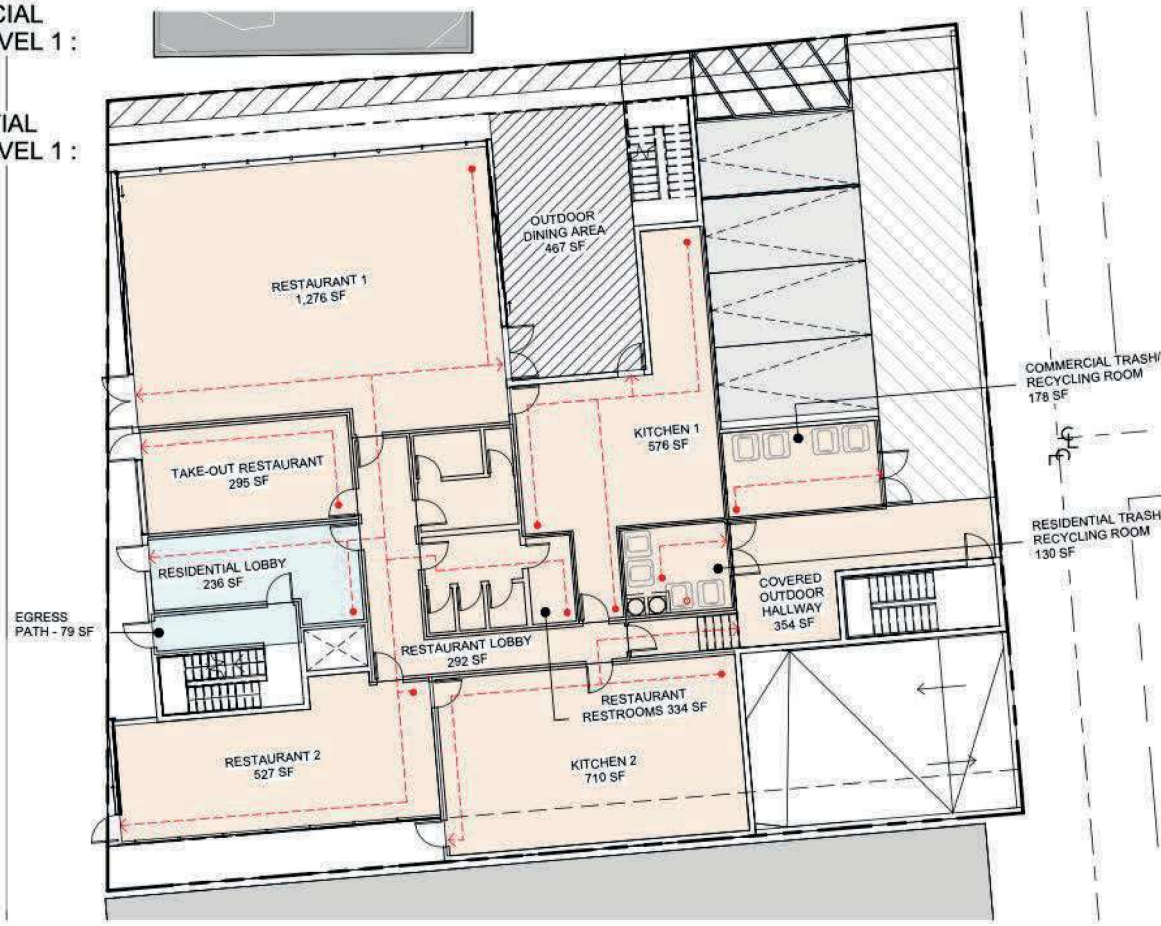
1 LV B1 PARKING - AREA PLAN
1/16" = 1'-0"

Ground Floor Plan (detail/color)



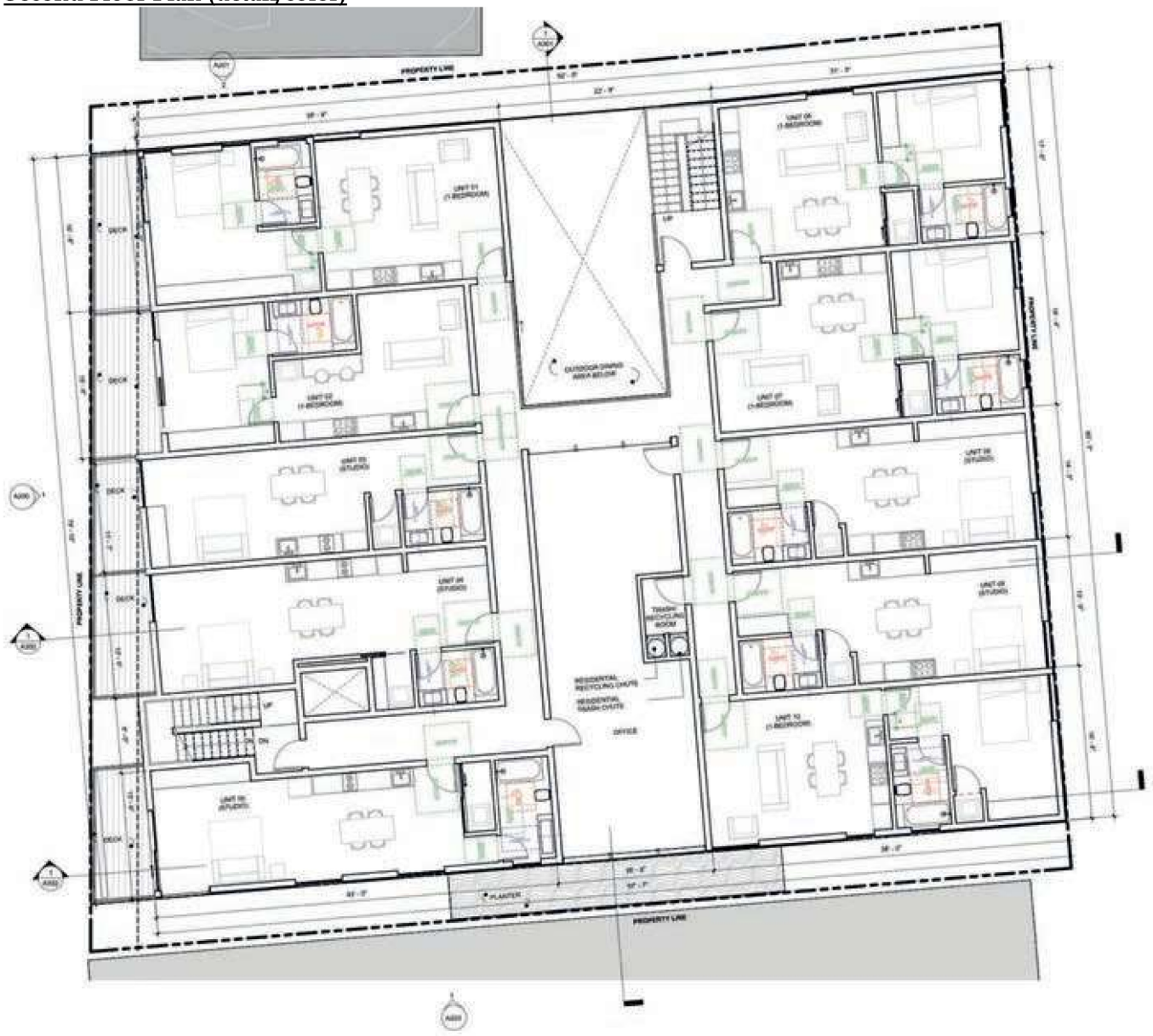
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 4,542 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 445 SF



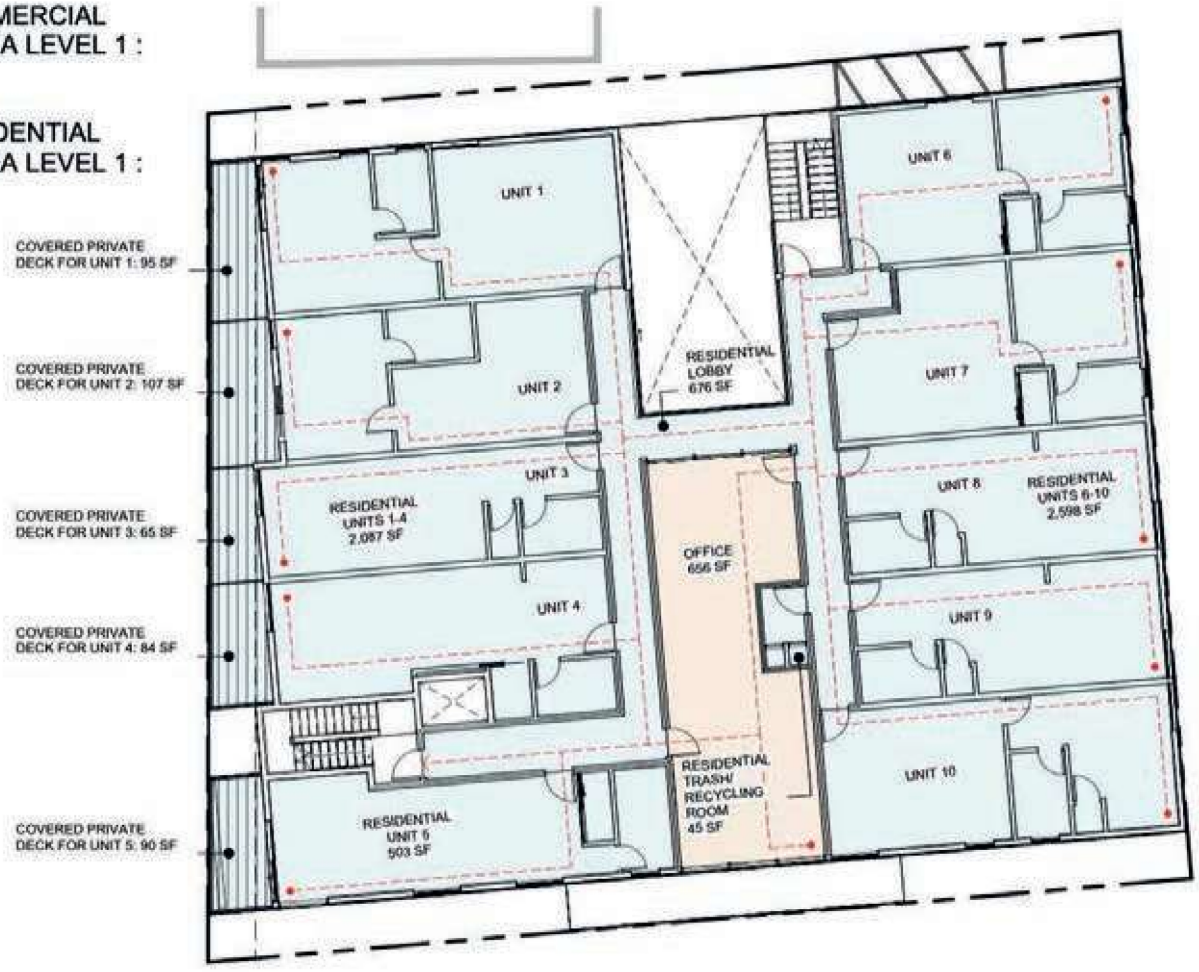
2 LEVEL 1 - AREA PLAN
1/16" = 1'-0"

Second Floor Plan (detail/color)



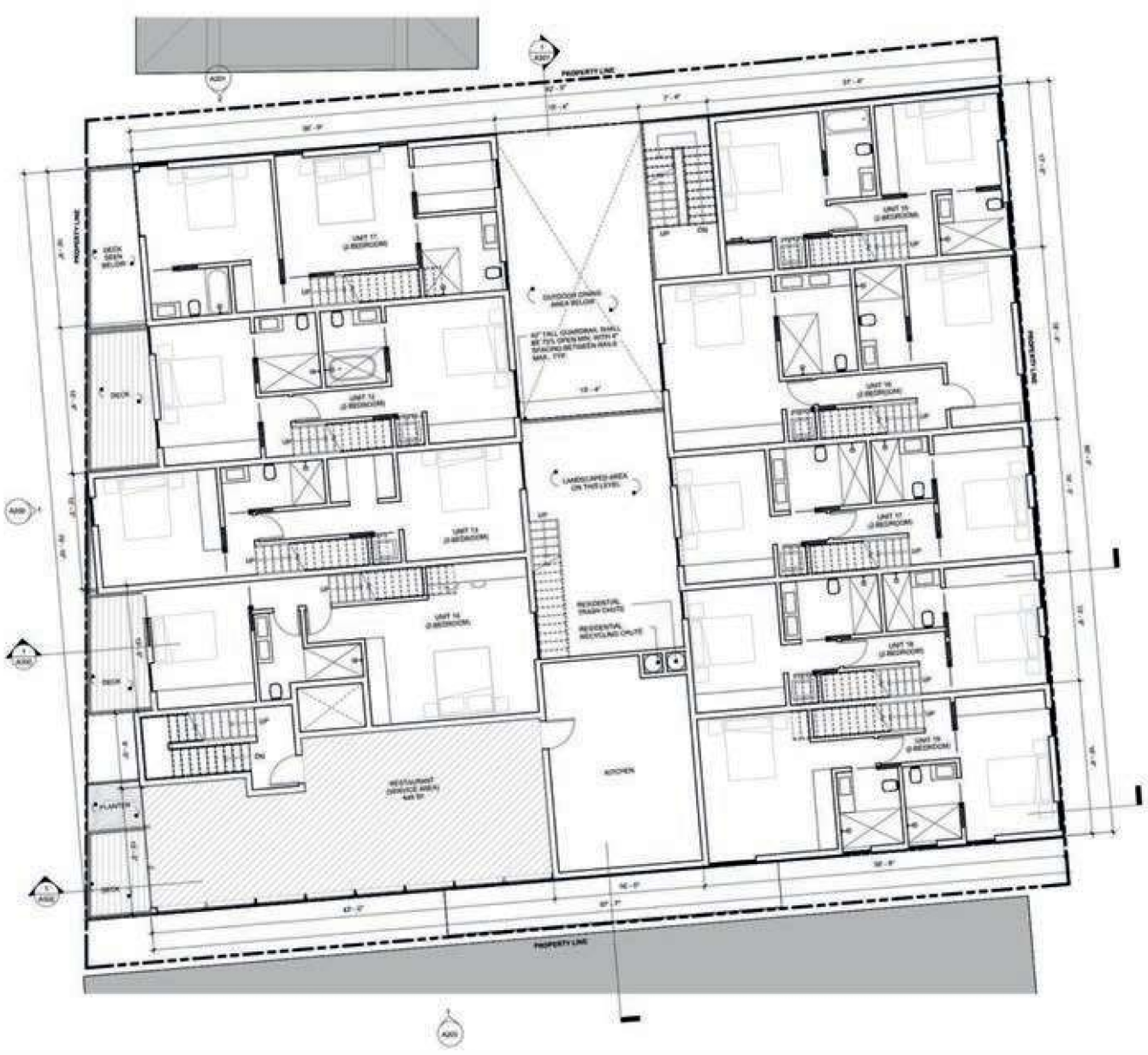
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 656 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 6,351 SF



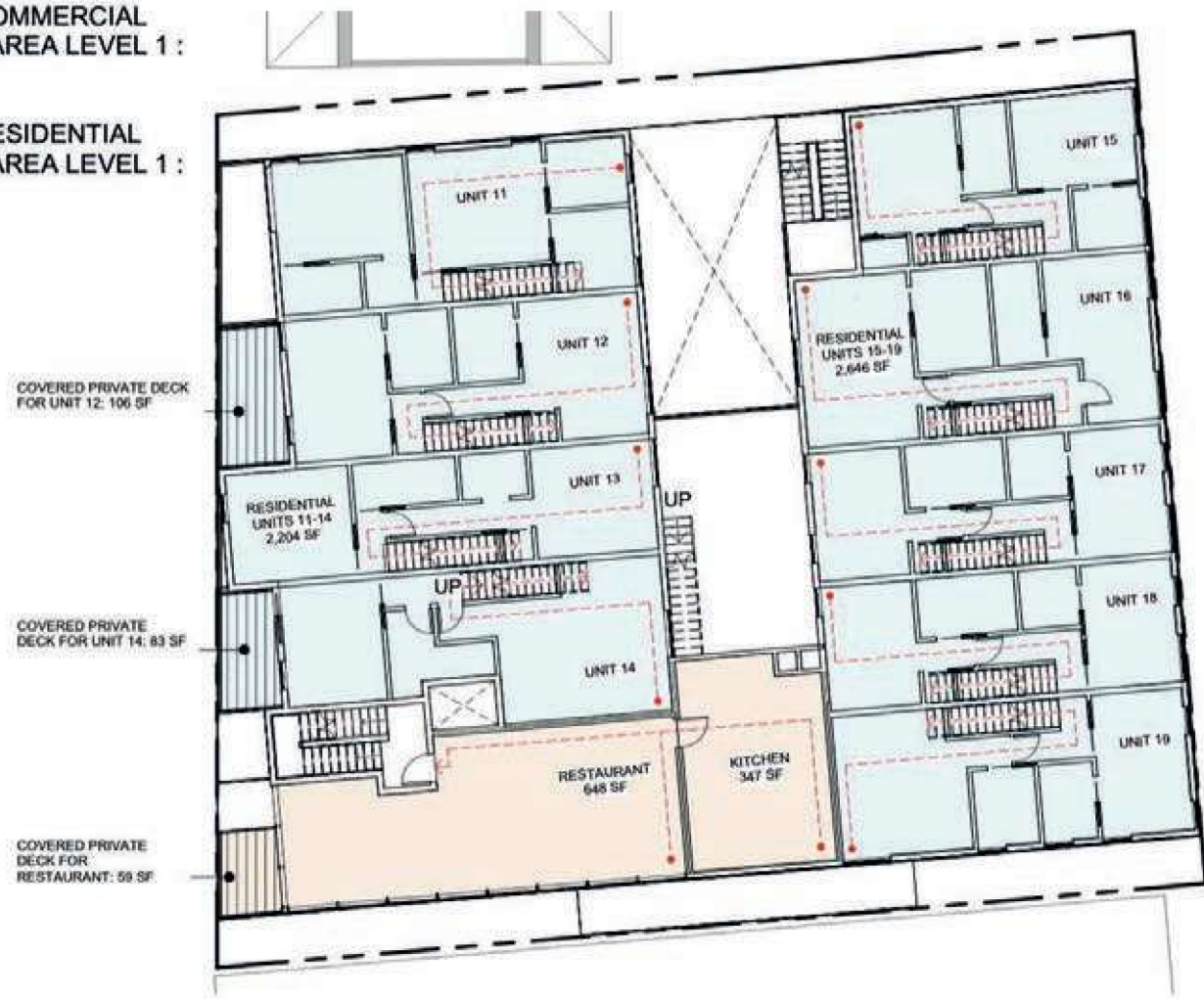
3 LEVEL 2 - AREA PLAN
1/16" = 1'-0"

Third Floor Plan (detailed/color)



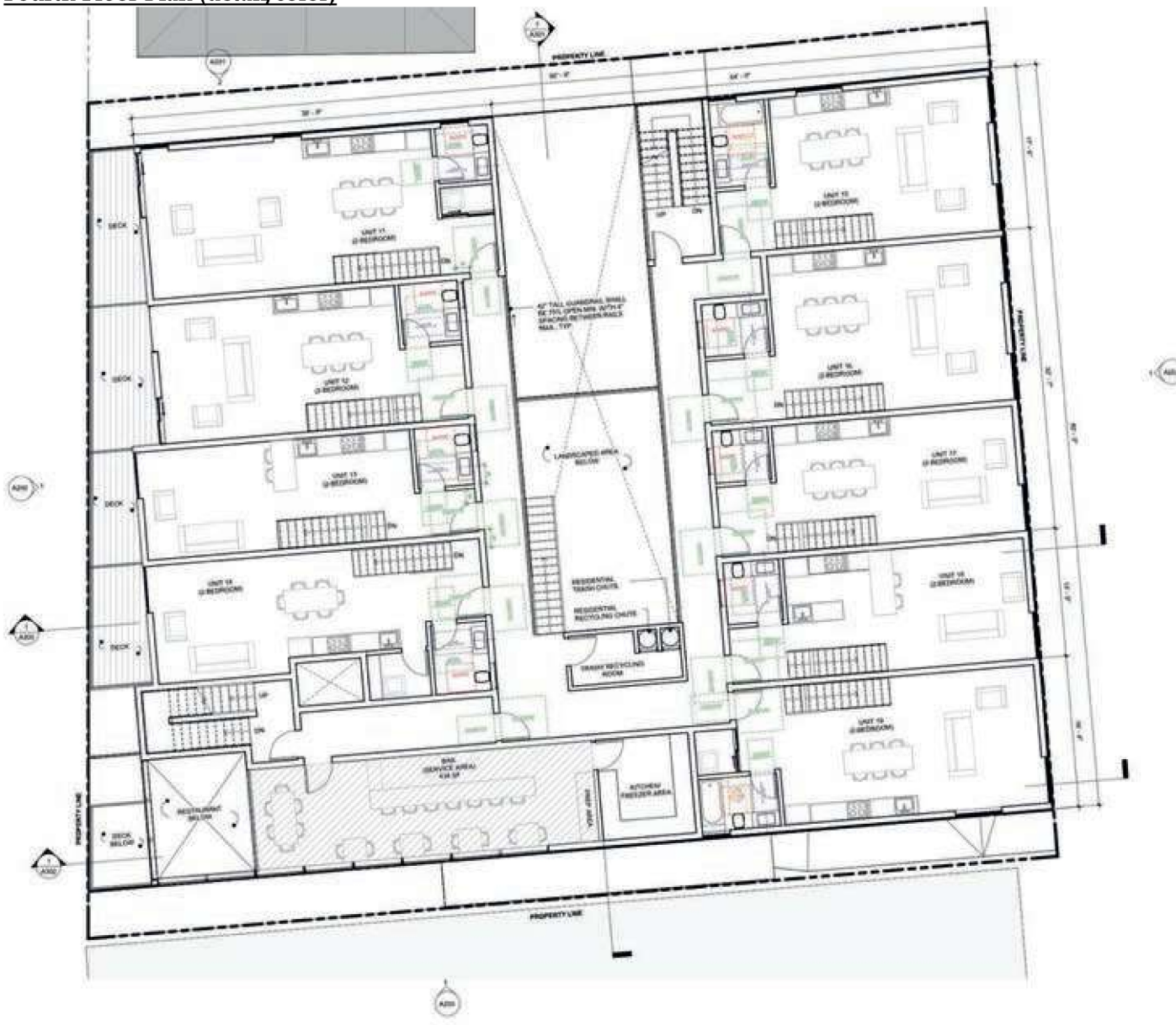
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 1,054 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,035 SF



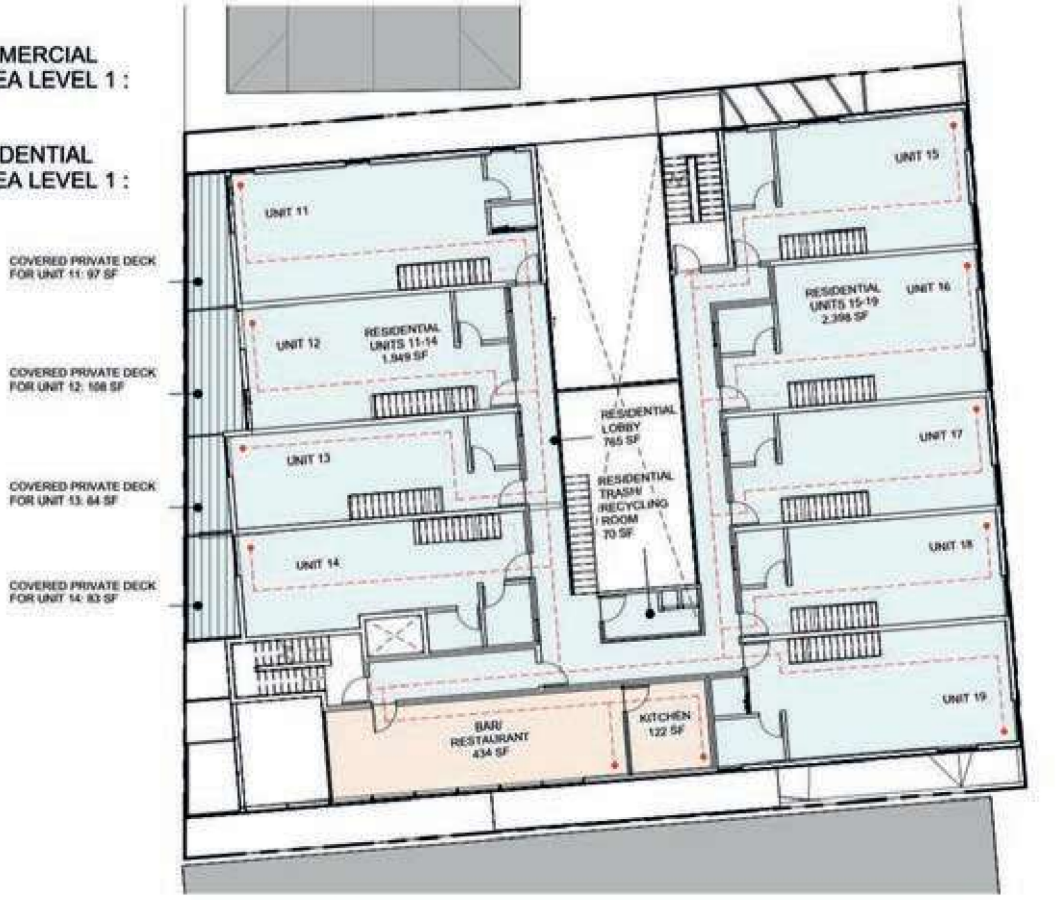
4 LEVEL 3 - AREA PLAN
1/16" = 1'-0"

Fourth Floor Plan (detail/color)



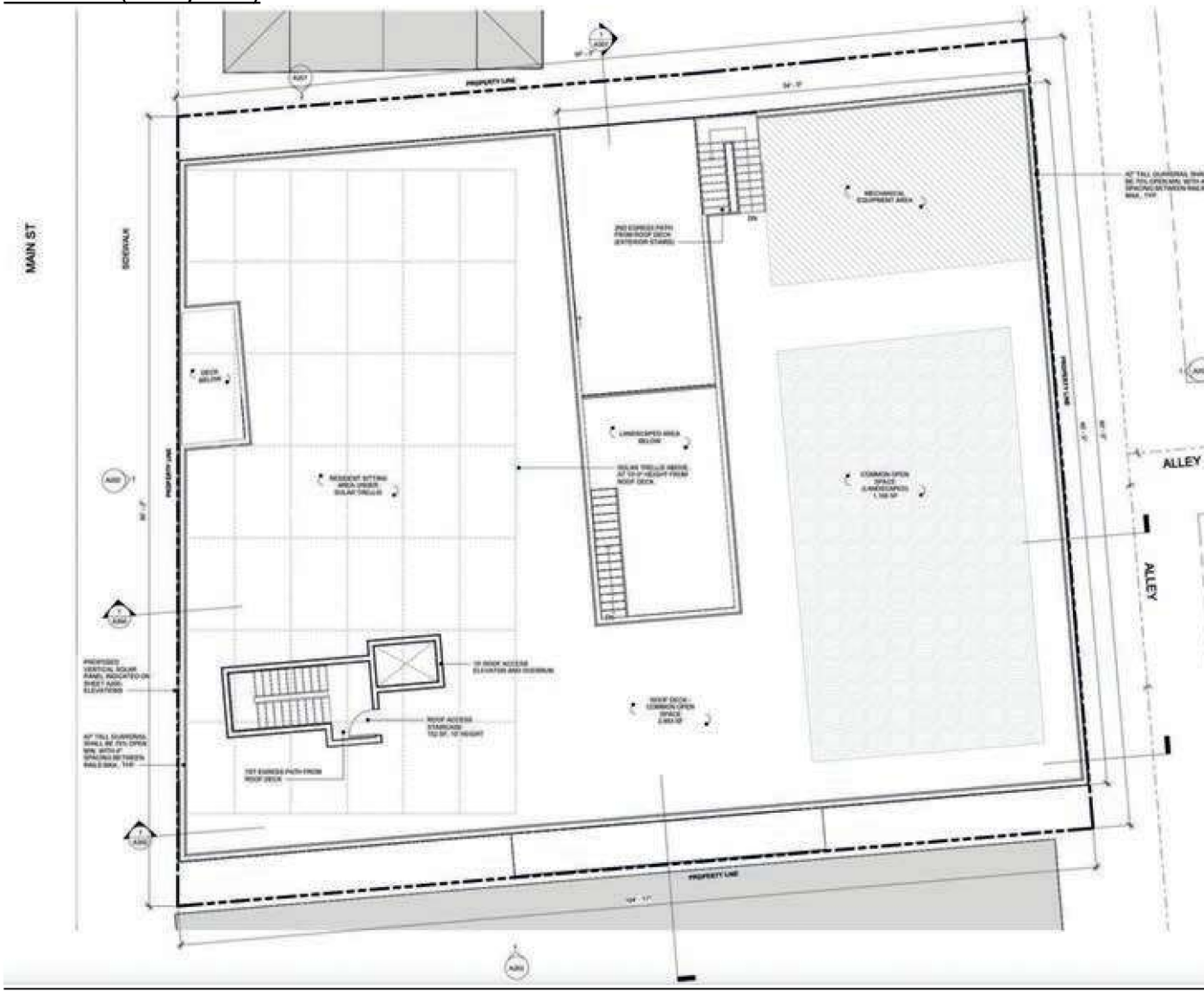
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 556 SF

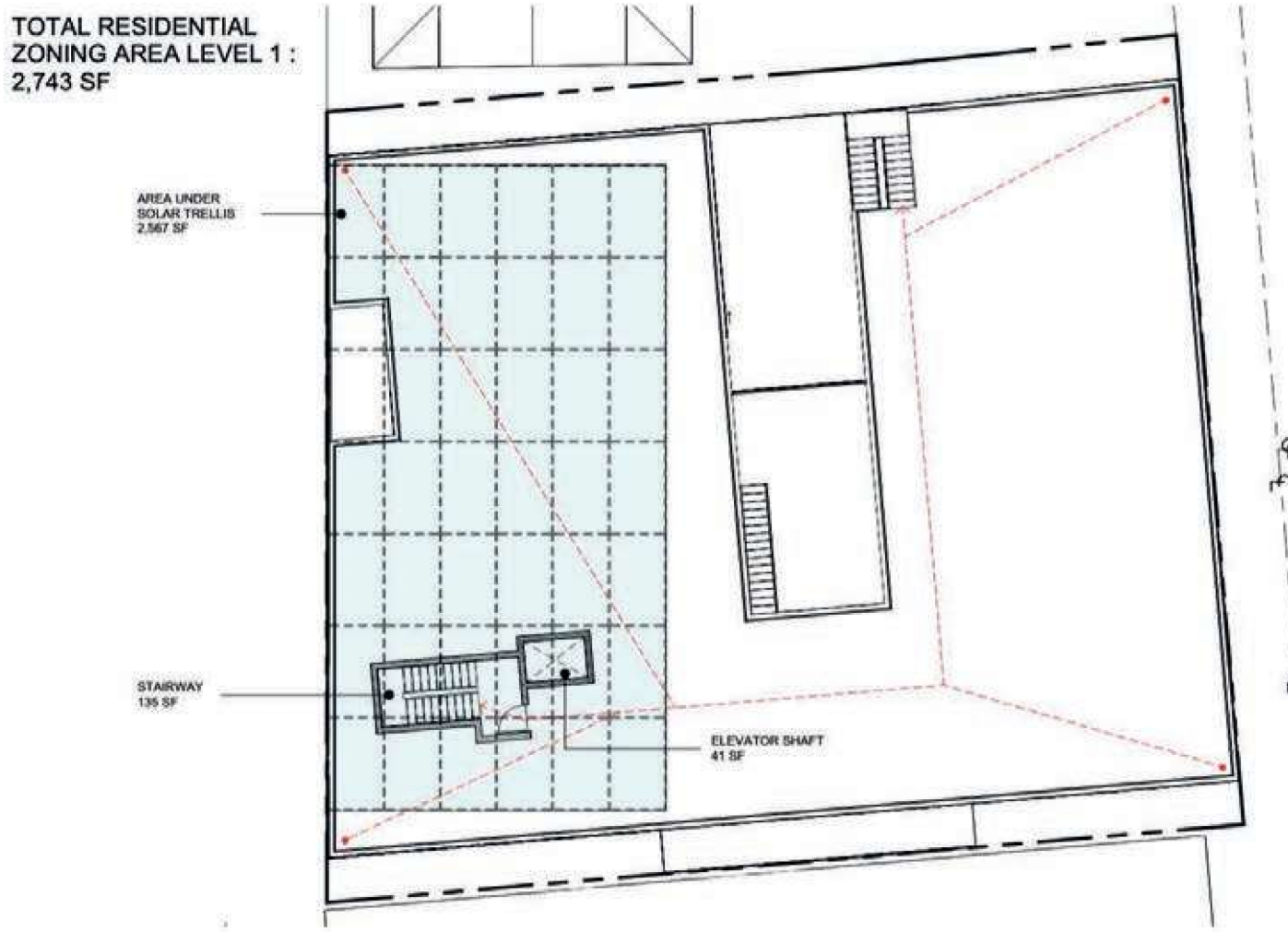
TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,463 SF



5 LEVEL 4 - AREA PLAN
1/16" = 1'-0"

Roof Plan (detail/color)

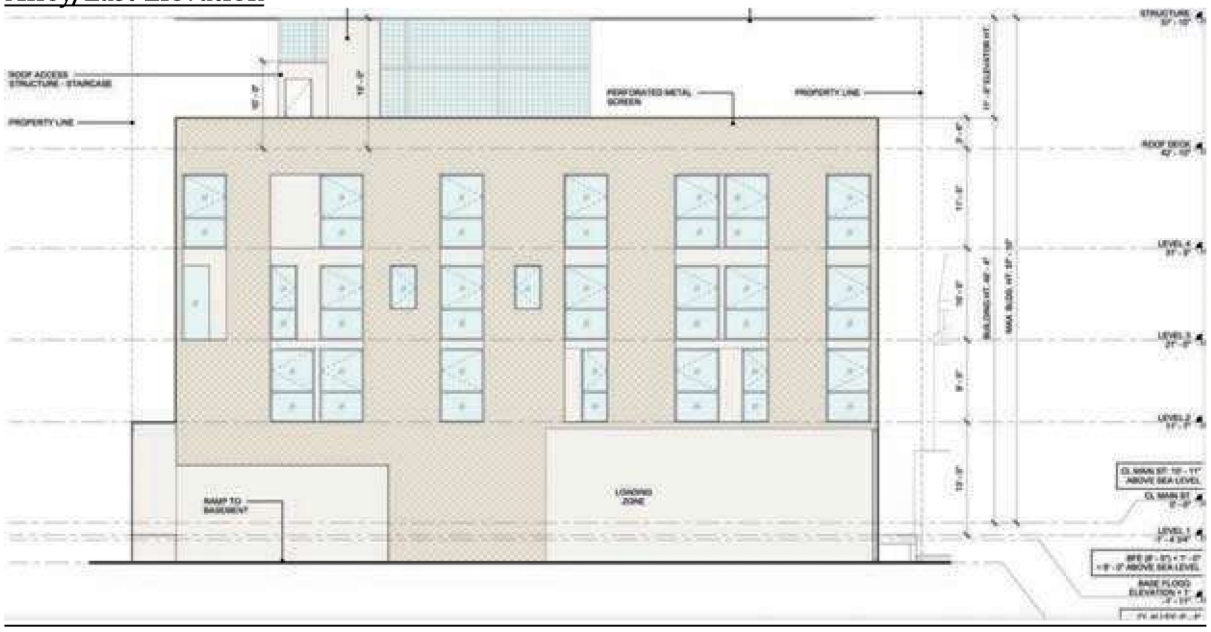




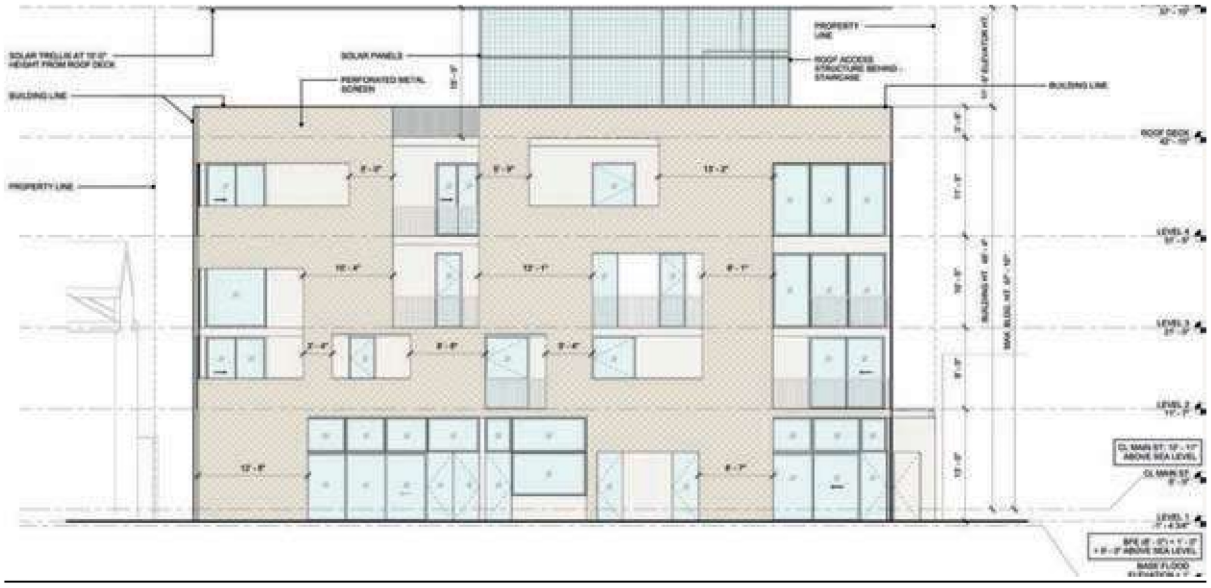
6 ROOF DECK - AREA PLAN
1/16" = 1'-0"

V. Elevations:

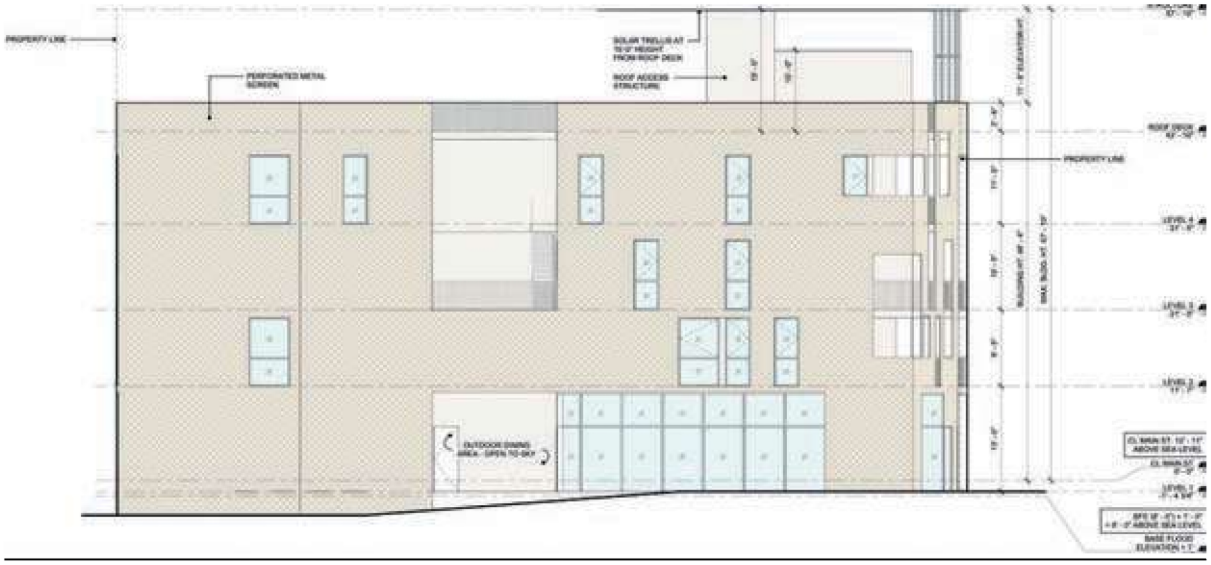
Alley/East Elevation



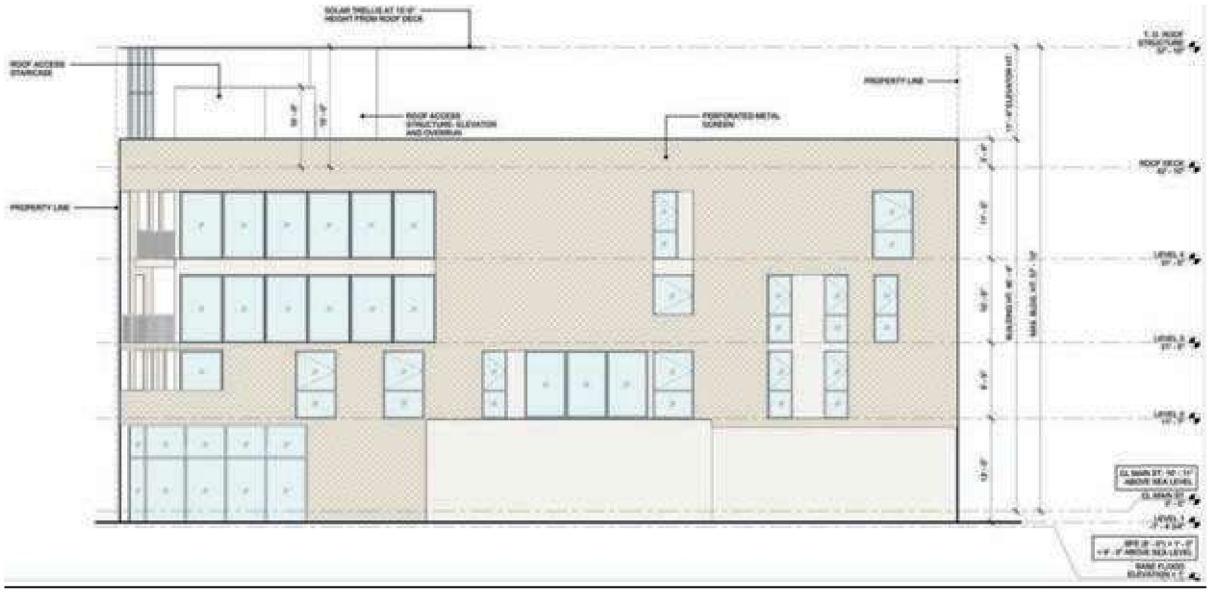
Frontage on Main Street/West Elevation



North Elevation



South Elevation



Venice Neighborhood Council
LAND USE AND PLANNING COMMITTEE
PO Box 550, Venice, CA 90294 | www.VeniceNC.org
Email: Chair-LUPC@VeniceNC.org

Land Use & Planning Committee (LUPC)
STAFF REPORT
December 9, 2025

City Case No:	**CPC-2021-2020-DB-CDP-SPPC-MEL-HCA**
CEQA Case No:	**ENV-2021-2021-EAF: Categorical Exemption under CEQA sections 15301 (Class 1) and 15332 (Class 32)**
Related City Case No(s):	**CPC-2013-2377-DB-CDP-SPP-MEL**
Address of Project:	**1410-1414-1422 Main Street**
Applicant/Property Owner:	**Brittany Teague, Three on the Tree LLC, a Nevada LLC, and Three on the Tree Venice LLC, a Nevada LLC**
Applicant's Representative:	**Tony Russo, Crest Real Estate** **Matthew Royce, Architect**
Standard of Review:	**Coastal Act, with certified Land Use Plan (LUP) as guidance (for CDPs)** **Venice Community Plan** **Other applicable State laws: Assembly Bill 2097** **Other applicable City laws: ADU ordinance** **Mello Act & Housing Crisis Act**
Coastal Zone:	**Single Permit Jurisdiction**
City Hearing:	**December 10, 2025, 1 pm**
Email for City Planner:	**Sienna.Kuo@lacity.org**
LUPC Staff assigned:	**Robin Rudisill & Mark Mack**

I. Detailed Project Description:

Demolition of 2 single-family dwellings, and the construction of a 26,845 SF, 5-story mixed-use structure on 3 lots, consisting of 19 residential units, of which 4 residential units will be set aside for Very Low Income (VLI) households; 6,152 SF of restaurant uses including 3,177 SF of indoor dining Service Floor Area and 467 SF of outdoor dining Service Floor Area; 656

SF of office uses and a roof deck with a solar trellis covered rooftop and an elevator/roof access structure, providing 28 parking spaces (24 tandem residential use spaces and 4 commercial use spaces) within a one level subterranean garage.

Reason for VNC/LUPC hearing this project:

The project representative failed to inform the neighborhood, LUPC and the VNC of the project's changed scope and impact on the neighborhood since the VNC heard the project in early 2021, almost 5 years ago. They have not conducted the proper neighborhood outreach necessary for the increased size and scope of this project, causing a strong neighborhood resistance to the project.

Therefore, the Venice Neighborhood Council scheduled a LUPC hearing (December 4th) and a Special VNC Board hearing (December 9th) in order to assess this significantly changed project and the impacts it presents to the neighborhood.

Changes between original project that VNC heard in 2021 to current version of the project:

1. Unit count increased from 9 units to 19 units (4 of which are affordable).

2. Parking garage reduced from two subterranean levels with 56 parking spaces to one subterranean level with 28 parking spaces.

3. Access is not through Main Street but rather through the alley, a very narrow 15' wide alley.

4. 3 stories to 5 stories (4 stories + 1 story solar trellis covered rooftop, roof access structure and elevator).

5. Height increase from 30' to 46'- 4" (maximum height of 57'10" with 15', 176 SF elevator overrun (vs. 10', 100 SF RAS) and solar trellis covered rooftop)

6. FAR increased from 1.49 to 2.95.

7. Restaurant spaces added on 2nd and 3rd floors, resulting in commercial grade occupancy on the second and third level of the structure, overlooking and adjacent to neighboring low-rise residential buildings.

II. Motion 1:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

Moved: Mark Mack
Seconded: Robin Rudisill
Vote: 6-1-1 (0 absent, 0 recused, 1 open seat)

III. Motion 2:

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

.

7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.
The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.
The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10′ minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-

foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.
The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.
The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.
The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone

Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.
The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Moved: Mark Mack
Seconded: David Turnbull
Vote: 8-0-0 (0 absent, 0 recused, 1 open seat)

IV. Motion 3 (continued indefinitely):

The Venice Neighborhood Council strongly recommends that the project be confined to 100% residential, within the development standards and policies of the Venice Specific Plan and LUP, which would: provide homes, be compatible with the surrounding residential neighborhood character, not create the

significant adverse impacts and nuisances on the surrounding residential neighborhood that commercial businesses would, and not violate the state Mello Act.

Motion 3 continued indefinitely:

Moved: David Feige
Seconded: Mark Mack
Vote: 6-1-1 (0 absent, 0 recused, 1 open seat)

V. Pros & Cons of Project:

Positive aspects of project:
4 affordable units.

Negative aspects of project:
Concerns about hearing notices: Several parties indicated that they did not receive the hearing notice, including Rick Garvey (within 300 feet) and Dr. Khoe (adjacent).

See also detailed findings in LUPC motion, above.

I. Neighborhood Outreach/Summary of Community Input:

Describe neighborhood outreach by Applicant's Representative and LUPC Staff Member, in detail:

The applicant made it clear that they were not paid to do neighborhood outreach on the significantly changed project and that they did outreach on the original project. However, they did contact Karen & Art from the condo building across Main Street. Once LUPC became aware of the project hearing being scheduled, we immediately scheduled a meeting to hear it so that it could be heard by the VNC prior to the City hearing. We contacted the applicant's representative and met with them prior to the LUPC meeting. We informed a few of the neighbors, whom we were aware of were concerned about the project.

Summary of Community Input

Concerns expressed by Neighbors:
The proposed loading dock is not large enough to serve most of the 5 and 10 ton and larger trucks that make these deliveries, and so many will simply park in the alley, which will prevent residents, as well as emergency vehicles, from coming and going. Trucks will also park down the middle of Market St. It is not uncommon for several trucks to be making deliveries simultaneously.

The project is outrageous, this is overbuilding, this is egregious, this is greed.

When neighbors in the residential blocks behind the project to the east look out their windows, they will see a big 5 story wall and won't be able to see the sky any longer.

Concern about habitability of the residential units adjacent to upper floor restaurants. Concern about the mixing up of uses in a strange way on the upper floors. Concern about combining access/entrances for residents and commercial uses.

See additional concerns in these letters from the neighbors:
https://www.venicenc.org/assets/documents/5/meeting69332e44d78a1.pdf

Suggestions from Neighbors:
At the LUPC hearing a request was made to the applicant for a sun/shade study. As of the publishing of this LUPC Staff report, the applicant has not provided the study.

As per neighbor Irv Katz, he would ask the developers to consider confining this proposal to a 100% residential use, within the requirements of the Venice Plan, which would provide homes and not create the problems that commercial businesses such as a restaurant would, including no constant flow of traffic into or out of the garage and no daily deliveries to block the alley or streets or create noise.

The traffic analysis excludes the restaurant uses entirely from the trip count by claiming the restaurants are "local serving." But restaurants with alcohol and outdoor dining are not local serving uses. "Local serving" refers to small convenience businesses (e.g., laundromat, dry cleaner, etc.), not destination restaurants. Restaurants in Venice draw visitors from outside the immediate neighborhoods. Restaurants have a very high trip counts (sit-down restaurant approx. 100 trips per 1,000 SF), especially when they serve alcohol. Excluding the restaurants keeps the project below the 250-trip threshold, dodging a full transportation analysis. This must be corrected and a full analysis done. DOT must require the inclusion of the restaurants in the trip count, which will require them to perform a traffic analysis.

The project seems to be trying to fit too much into an inappropriate lot. That is a sure sign of a developer more interested in profit than community.

II. Findings re. Entitlements:

For your use in determining the entitlements, here is the link to the City Planning Prefix (approving entity) and Suffix (entitlements) Report where you can look up the City Case No. coding abbreviations:
https://planning.lacity.gov/resources/prefix-suffix-report

A. Coastal Development Permit (CDP) – Coastal Act & certified Land Use Plan (LUP) are standard of review

NOTE: The lot at 1410 Main St is vacant land as per ZIMAS. There is no Coastal Development Permit (CDP) approving a demolition of any structures that were previously on the 1410 Main St lot, which would imply that such a demolition must be covered with an after-the-fact approval in this CDP. However, the applicant provided a building permit application for demolition of an existing structure in 1968, which means this demolition was done pre-Coastal Act (57 years ago) and therefore doesn't require a CDP. It is unknown whether or why the lot has remained undeveloped for 57 years. The lot is currently used as residential/office space using converted shipping containers. The structures and uses currently on the vacant lot are not permitted and therefore constitute a violation of the Coastal Act as they are unpermitted development:



1. **Parking/Coastal Access—Assembly Bill 2097 must also be considered in the standard of review**

Coastal Act Section 30252 states: ***The location and amount of new development should maintain and enhance public access to the coast by facilitating the provision or extension of transit service…and providing adequate parking facilities or providing substitute means of serving the development with public transportation***

The project lies in an AB 2097 area and as such minimum parking cannot be required. However, the applicant proposes only 28 parking spaces, which is significantly lower than the parking minimums required by the Venice Specific Plan and certified Land Use Plan (LUP). No proposed mitigations were noted. The 15' alley is too narrow for any real use, especially one that requires truck traffic, 2-way traffic, or a clear path for others to access parking spaces. Most Venice alleys are 25' and it is still difficult to enter one's garage nor can two cars pass.

2. **Scenic and Visual Qualities**

Coastal Act Section 30251 Scenic and visual qualities states: ***The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.***

At 5 stories and 57'10", and spanning three lots with no visual breaks, the project is in no way compatible with the character of the surrounding area, which is primarily 1-lot, 2-3 story structures. The project violates Coastal Act Section 30251.

3. **3-Lot Consolidation**

Certified Land Use Plan Policy I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10' minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

Policy I. B. 7. Commercial Development Standards. The following standards shall apply in all commercial land use designations, unless specified elsewhere within this Land Use Plan.

Venice Local Coastal Program
II-21

Density/Intensity: Maximum Floor Area Ratio (FAR)

0.5 to 1 for retail only (including restaurants)
1.0 to 1 for retail / office
1.5 to 1 for retail and/or office and residential

Parking: See Land Use Plan Policies II.A.3 and II.A.4.

Lot Consolidation. Two commercial lots may be consolidated, or three with subterranean parking with the following restrictions:

1. Methods for insuring that the structure does not look consolidated (breaks in front wall of ten feet minimum) shall be utilized.

2. Subterranean parking shall be fully depressed with roof at natural grade.

Exception: Lot consolidation of more than two lots shall be permitted for mixed-use projects which conform to the existing scale and character of the surrounding community and provide adequate on-site parking.

Building Separation: A minimum of five feet between commercial and residential buildings (except for mixed-use projects).

Yards: Per the following Ground Level Development Policy which requires that commercial development be designed in scale with, and oriented to, the adjacent pedestrian accessways (i.e. sidewalks).

Ground Level Development: Every commercial structure shall include a Street Wall, which shall extend for at least 65% of the length of the street frontage, and shall be located at the property line or within five feet of the property line, except on Ocean Front Walk, where all commercial buildings shall have the Street Wall set zero (0) feet from the building line. The required Street Wall at sidewalk level shall be a minimum of 13 feet high. (A Street Wall is the exterior wall of a building that faces a street.)

Street Walls adjacent to a sidewalk café, public plaza, retail courtyard, arcade, or landscaped area may be setback a maximum of 15 feet along the project which consists of the sidewalk café, public plaza, retail courtyard, arcade, or landscaped area. Such areas shall not be considered in calculating the buildable area of a project but, with the exception of areas used only for landscaping, shall be considered in calculations for required parking.

At least 50% of the area of the ground floor Street Wall shall be devoted to pedestrian entrances, display windows, and/or windows affording views into retail, office, gallery, or lobby space.

Blank walls shall be limited to segments of 15 feet in length, except

---

4. Protection of Special Coastal Communities

Coastal Act section 30253(e) states: ***New development shall do all of the following…(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.***

LUP Policy Preservation of Venice as a Special Coastal Community states:

Preservation of Venice as a Special Coastal Community	**Policy I. E. 1. General.** Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.
	Policy I. E. 2. Scale. New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect
	Policy I. E. 3. Architecture. Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

According to ZI 2453, the project is located in the Lost Venice Canals Historic District, which is significant as a unique example of early-20th century residential development oriented around the original Venice canals developed by Venice of America founder Abbot Kinney. The district was evaluated as a whole and individual properties were surveyed and identified as Potential Contributors or Non-Contributors to the district, or as Not Sure (properties generally not visible from the public right-of-way). Properties identified as Potential Contributors or Not Sure in SurveyLA, unless otherwise found exempt, will be reviewed by the Department of City Planning, in consultation with its Office of Historic Resources, to determine if the property is a "historical resource" as defined in CEQA. If the City determines the property to be a historical resource, the City will evaluate if the project would have significant impacts to the historical resource. Even if the property is not determined to be a historical resource, the City will evaluate if the project would have an impact on other nearby historical resources, which may include the potential historic district.

The structure on 1422 Main St was identified as "Not Sure" in SurveyLA, which means that it should be reviewed by the Department of City Planning, along with the Office of Historic Resources, to determine if the property is a historical resource. Excerpt from SurveyLA:

Venice Report

Historic Districts, Planning Districts and Multi-Property Resources – 04/02/15

SurveyLA



Primary Address:	1422 S MAIN ST
Type:	Not sure
Year built:	1921
Property type/sub type:	Residential-Single Family; House
Architectural style:	Craftsman

It is not clear whether the City's Office of Historic Resources has analyzed the project's impact on the historic district.

Venice was designated as a "Special Coastal Community" by the City of Los Angeles and the California Coastal Commission, as documented in the LUP. The definition of Special Coastal Community is: "An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast." If the Lost Venice Canals Historic District is degraded by a project such as this that is so significantly out of compliance with the LUP in so many ways, the risk of Venice losing its Special Coastal Community status is increased because the very definition of Venice as a Special Coastal Community relies on Venice's historical heritage. Thus, the project does not protect the Special Coastal Community of Venice and in fact degrades it and thus is in violation of Coastal Act section 30253(d) and LUP Policy I.E.1.

As stated in ZI 2453, the Lost Venice Canals Historic District is a residential neighborhood with boundaries coinciding with those of Venice's original canal district. Streets throughout the district exhibit an irregular pattern which reflects the area's original network of canals. Development in the district is primarily residential. Original single and multi-family residences were constructed primarily from the 1910s through the early 1920s and are one or two stories in height. Other features of the district include the unique configuration of the streets, which create irregularly shaped blocks originally bounded by canals.

According to ZI-2453, the Lost Venice Canals Historic District is significant as a unique example of early-20th century residential development, oriented around the original Venice canals developed by Venice of America founder Abbot Kinney. The district's period of significance is 1904 to 1929, encompassing the period during which the canals were extant. The district represents the area set aside by Kinney for residential development in Venice. After a years-long legal battle between residents and city officials, in 1929 the Venice of America canals were filled in and paved over. Today, the Lost Venice Canals Historic District stands out from surrounding development due to its unique planning and development around Venice's original system of canals. Despite a relatively low percentage of contributing properties, ***the neighborhood retains a distinctive feel that conveys a strong sense of time and place.***



As with the first attempt at a development project at this site in 2014, which was withdrawn within one year of application, the historic preservation issues remain unaddressed.

5. **Cumulative Effect**

Coastal Act section 30250 (a) 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…***

This project violates Coastal Act Section 30250(a) because it places a large, high-intensity mixed-use development in a built-out, historic, low density coastal neighborhood that is not "able to accommodate it" in terms of circulation, parking, and public services, as shown by the documented loss of required parking and substandard alley access. By over-concentrating development on this constrained site and worsening traffic and parking conditions that already limit public access to the beach, the project will have significant adverse cumulative effects on coastal resources, contrary to section 30250(a).

B. Density Bonus Act (DB)

1. The "Major Transit Stop" qualifying the project is at Windward Circle.

2. With 4 Very Low Income (VLI) units, the project qualifies for 4 incentives (unlimited waivers of development standards is allowed).

The following Density Bonus incentives are requested:

1. Off Menu request for a Floor Area Ratio (FAR) increase of 96.6 percent resulting in a FAR of 2.95, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3.
2. Off Menu request for a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.
3. Off Menu request for a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.
4. A zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a).

The following Waivers of Development Standards are requested:

1. Maximum building height of 57' 10", in lieu of 30', as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.
2. 100% decrease in usable open space from 2,525 square feet required.
3. Removal of the step back provisions, in lieu of a 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F(3)(a).
4. A Roof Access Structure with a maximum height of 15 feet in lieu of 10 feet, as otherwise required pursuant to the Venice Coastal Zone Specific Plan Section 9.C.
5. A Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

3. Harmonizing of State Density Bonus Act and State Coastal Act

Government Code Section 65915(m) of the state Density Bonus law states that all density bonus incentives, waivers, etc. to which the applicant is entitled under Government Code Section 65915 shall be permitted in a manner that is consistent with both the Density Bonus law and the Coastal Act. The State Legislature's intent is that the two statutes be "harmonized" so as to achieve the goal of increasing the supply of affordable housing in the Coastal Zone while also protecting Coastal Resources and Coastal Access.

According to the Coastal Commission's February 6, 2019 Report (W7f), the two state laws are to "be harmonized to provide for affordable housing in the Coastal Zone in a manner that is consistent with Coastal Act resource protection policies and ensures that the Act's scenic and visual resources policy is not used erroneously as a basis for blocking density bonus projects in the Coastal Zone." This means that the question is whether a project is

seeking the minimum incentives and waivers necessary to provide for the affordable units. The problem in determining the answer is that State Density Bonus law mandates that evidence of the need is not required. Therefore, applicants are able to ask for more incentives and waivers than they need to cover the cost of providing the affordable housing, which appears to be the case for this project.

This project does ***not*** harmonize the State Density Bonus Act and State Coastal Act due to the **extreme de facto variances** from the development standards and policies of the Venice Specific Plan and LUP—3-lot consolidation rather than the maximum of 2, almost doubling of the height to 57'10" vs. the LUP requirement of 30', essentially doubling of the FAR (2.95 vs. allowable 1.5), removal of the step back provisions, 3' reduction of both side yards.

For example, in the 657 Sunset case, the LUPC concluded that, on balance, the requested incentives and waivers were modest compared to typical density bonus projects in non-Coastal Zone areas of Los Angeles, and that the project omitted a roof deck, kept the fourth floor stepped back, and provided 24% VLI units, such that the density bonus incentives could be harmonized with Coastal Act resource protection for that project.

However, for 1410-1414-1422 Main, the applicant is requesting relief from several of the most sensitive standards in the Venice Coastal Zone:

- Almost doubling the height
- Essentially doubling of the maximum FAR
- Major yard reductions on all sides
- No step backs
- Significant reduction in on-site parking relative to VCZSP/LUP requirements in an area that is extremely close to the beach
- Consolidation of three lots (beyond the 2-lot maximum per VCZSP/LUP)

The project's design seeks to maximize buildout in every dimension. The applicant has not demonstrated that all of these requested incentives and waivers are the minimum physically necessary to accommodate the 4 affordable units. As a mixed-use project, the incentives--which are larger than others requested in the Venice Coastal Zone used to fund the provision of affordable units--not only provide for enough market rate residential units to fund the affordable units, but the incentives also provide a significant benefit in terms of the commercial uses, which are 25% of the project (6,808 SF/26,845 SF), which is an exploitation of the Density Bonus law.

Given the size and intensity of the proposed structure, it appears highly likely that a shorter, less massive building could still provide a meaningful number of affordable units while protecting coastal resources.

Under §65915(m), the City cannot treat the Density Bonus Law as overriding the Coastal Act or the LUP. Instead, the City must limit or deny incentives and waivers that would

otherwise cause the project to conflict with Coastal Act resource protection policies, including:

- Significant adverse impacts on coastal access and parking
- Degradation of scenic and visual resources in a highly scenic area--the Lost Venice Canals Historic District
- Harm to a recognized Special Coastal Community

The City is obligated to withhold those specific waivers and require redesign so that affordable housing goals and coastal protection goals are ***both*** honored.

The project does *not* comply with the Density Bonus Act because the project, as proposed, does not harmonize the Density Bonus Law with the Coastal Act. Instead, it uses density bonus tools to attempt to override key coastal protections (height, parking, FAR, massing, lot consolidation) in a manner that is directly contrary to §65915(m)'s command that density bonus entitlements be granted only in a Coastal-Act-consistent manner. This project is an abuse of the Density Bonus law.

4. LUP Policy I.A.13. Density Bonus Applications

Policy I. A. 13. Density Bonus Applications: ***Required replacement dwelling units shall be counted as reserved units in any related State-mandated density bonus application for the same project. In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915 provided that the affordable housing complies with sections a – f of Policy I.A.13.***

The project does ***not*** conform with LUP policy I.A.13. for all of the same reasons noted above that it does not comply with the Density Bonus Act.

C. Mello Act (MEL)

This project violates the Mello Act (Gov. Code §§65590–65590.1). The Mello Act state law protects housing in the Coastal Zone. The purpose of the Mello Act is three-fold: *to maintain existing residential structures*, to protect existing affordable *units*, and to provide new affordable housing in new developments. The law states:

> "The conversion or demolition of any residential structure for purposes of a nonresidential use which is not coastal dependent...shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."

The statute flatly prohibits demolishing or converting an existing residential structure to a non-residential use that is not coastal-dependent unless the local government first determines, based on evidence, that residential use is no longer feasible at that location. No such feasibility finding has been made here, and the facts show the opposite:

- The legal, permitted use of the existing buildings is residential.
- The structures are functioning residential housing in a residential context.
- Nothing in the record shows that continued residential use is infeasible—only that the applicant ***prefers*** a more lucrative commercial/mixed-use project.

The legal, permitted use for the existing structures is residential; thus, they are protected by the Mello Act regardless of the underlying zoning designation, and any project for these properties must be residential use only. The Mello Act state law does not distinguish between zones, it protects all residential structures and affordable units, regardless of what zone they are in. The project cannot be approved as a mixed-use project whose purpose is to convert coastal housing into any portion of commercial space.

The Mello Act was enacted to prevent exactly this pattern—the erosion of coastal housing stock, especially lower-cost units, in favor of high-profit commercial uses, just like this project. Approving this project would defeat the very purpose of the statute and would be inconsistent with both state law and the City's own Mello Act implementation procedures.

The applicant believes that because the City, in 2019, proposed a Mello Act ordinance that would have allowed demolition of a residential structure for purposes of a mixed use project if the project provided all required replacement affordable and inclusionary units, that they could do so with the proposed project. However, this provision would have constituted a change to the existing Mello Act law and City Mello Act policy, and the draft ordinance was never approved. The Council file (15-0129-S1) expired in November 2023 and in fact no effort has been made since then to resurrect this significant proposed change:

> Proposed new LAMC 12.21H.c.7.: "Mixed Use Development. A proposed mixed use development may not result in a net reduction in the total number of existing Residential Units unless a residential use is no longer feasible. A mix of uses is permitted, so long as the structure provides all required Replacement Affordable and Inclusionary Units."

The fact that City Planning was requesting this change in their draft of the Mello Act ordinance shows that it is not currently allowed; otherwise, they would not have wanted or needed to add this provision.

See Attachment I for a May 4, 2021 letter from housing rights and environmental/land use attorney Venskus & Associates and the California Women's Law Center that explains why this proposed change would be unlawful and could not have been lawfully approved. As stated in this letter: "One of the main avenues the Mello Act proscribes for protecting residential housing is to limit the ability to convert existing residential structures to non-

residential uses. To allow such conversions would not only violate both the letter and the spirit of the Mello Act, but it would plainly threaten housing, by allowing its destruction for purposes of a more lucrative commercial use, including mixed use projects, thus displacing families and damaging coastal communities that are already holding on by a thread—exactly what the Mello Act was intended to prevent." The Applicant's demolition of the existing residential structures for purposes of a non-residential mixed-use project is a violation of the Mello Act and the City's Interim Administrative Procedures for complying with the Mello Act, and thus this mixed-use project is a non-starter.

In addition, in its letter dated October 19, 2021 regarding the draft Mello Act ordinance, the Coastal Commission Staff stated: "The mixed-use development policy outlined [in the draft Mello Act ordinance, proposed new LAMC 12.21.H.5.c.7] is therefore not consistent with the Mello Act, since it expands the definition of "residential structure" beyond the intent of the Mello Act. Commission staff is aware of several recent developments, especially in Venice, that have already incorporated draft language of this ordinance to justify approval of the demolition or conversion of residential properties for purposes of mixed-use properties along commercial corridors."

Lastly, the City's May 18, 2022 letter from the Los Angeles Housing Department with the subject "Mello Act Determination" is a determination with respect to only one requirement of the state Mello Act--the affordability of the existing units. As per the City's Mello procedures, the overall Mello Act Determination would be included in the related discretionary permit, the Coastal Development Permit, where all three Mello Act requirements would be considered: *whether existing residential structures are being replaced only with residential structures*, whether existing affordable *units are being replaced*, and whether inclusionary affordable housing is being provided.

D. Housing Crisis Act (HCA)

According to the City in its October 29, 2025 letter from the Los Angeles Housing Department, of the two units that existed on the properties within the last five years, one unit will remain protected by the RSO, one unit must be replaced as an affordable unit, and one unit must be replaced at market rate. The residential unit(s) demolished in 2018 are not covered in this analysis because they occurred more than five years prior to the date of Housing's affordable units determination, October 29, 2025.

E. Add any other applicable entitlements here, such as SPPE (Specific Plan Project Exception), ZAA (Zoning Administrator Adjustment), etc.

It is not clear why the original project's entitlement request for a waiver of dedication is no longer being considered.

Prior VNC letters for same/similar location:

In 2021, the VNC heard the original project proposed under this application, which was significantly different, i.e. 3 stories v. current proposed 4 + 1 story for solar with trellis ceiling, and 9 dwelling units v. current proposed 19 dwelling units, etc. The VNC Board supported the project but only if the underground mechanical room was removed, the entrance to the parking garage and the loading zone were moved from the alley to Main Street, and deliveries were restricted to 8 am to 8 pm. Also, the applicant was to clarify whether the proposed solar structures are compliant with city code and/or mandated by State law:

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

June 23, 2021

By email
Bindu Kannan bindu.kannan@lacity.org

Dear Bindu Kannan:

Please be advised that at a regular public meeting of the Venice Neighborhood Council (VNC) Board of Officers held on June 15, 2021, the following Land Use Planning Committee (LUPC) motion was approved.

Project Description: 1410 -1422 Main Street APCW-2021-2020-CDP-MEL-SPE-SPP-WDI. Demolition of the (2) existing single family dwellings and the construction of a new 3-story mixed use building (commercial + 9 new dwelling units) and a 2-story basement garage on (3) lots.

MOTION: The Venice Neighborhood Council recommends approval of the project with the following conditions:

1. Remove the underground mechanical room
2. Make the entrance/exit the project on Main Street, and the loading zone on Main Street. City to stripe the pavement accordingly.
3. Deliveries not prior to 8am and not after 8pm
4. Applicant to clarify whether the solar structures as proposed are compliant with city code and/or mandated by State law

ACTION

it was approved by a vote of 12-5-1.

Respectfully submitted,

Ira Koslow
President
Venice Neighborhood Council
www.venicenc.org

It's YOUR Venice - get involved!

In 2014 the VNC heard a different Density Bonus project on the site, which was slightly larger. The Board recommended denial of that project due to: excessive incentives requested, inconsistency with the surrounding neighborhood character, mass and scale, applicant's failure to show that the incentives requested were necessary to make the housing units economically feasible, excessive FAR, danger of extremely poor circulation with the parking entrance on the back alley, excessive lot consolidation, no demand management strategy, and unaddressed historic preservation issues. That application was withdrawn in 2015.

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

April 21, 2014

Linn Wyatt
Chief Zoning Administrator
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012-2601

Case Number: CPC-2013-2377-DB-CDP-SPP-MEL
Project: 1414 Main Street, Venice 90291
Description: Density Bonus (Off-Menu) with 5 incentive requests, SPP, CDP, Mello Act compliance review to develop a 46-feet/4-stories, 91,968 square foot, mixed-use development.

To Linn Wyatt,

Please forward the **DENIAL** of the proposed project to the appropriate Zoning Administrator for this project once that person is assigned. This will advise that at a regularly held public meeting of the Venice Neighborhood Council's (VNC) Board of Officers on March 18, 2014, it was moved and passed by the Venice Neighborhood Council as follows:

MOTION:
The Venice Neighborhood Council recommends DENIAL of the project as presented based on:
- Excess of off-menu affordable housing density bonus incentives (five vs. three that are specified by SB 1818).
- Inconsistency with the character, mass, and scale of the surrounding neighborhood
- The applicant's failure to show that the off-menu incentives are necessary to make the housing units economically feasible (especially in lieu of cost to develop 89 excess parking spaces).
- Excessive FAR.
- Danger of extremely poor circulation with the parking entrance onto alleyway Toledo Court (except for residences and employees).
- Excessive lot consolidation.
- Missing transportation demand management strategy.
- Unaddressed historic preservation issues.

ACTION: Motion made by Ira Koslow, seconded by Marc Saltzberg. Motion to DENY the project approved 14-1-1

It's YOUR Venice - get involved!

Photos of existing:

Alley (15′ wide)—from south/Market St. Note: 2 normal sized cars cannot pass.



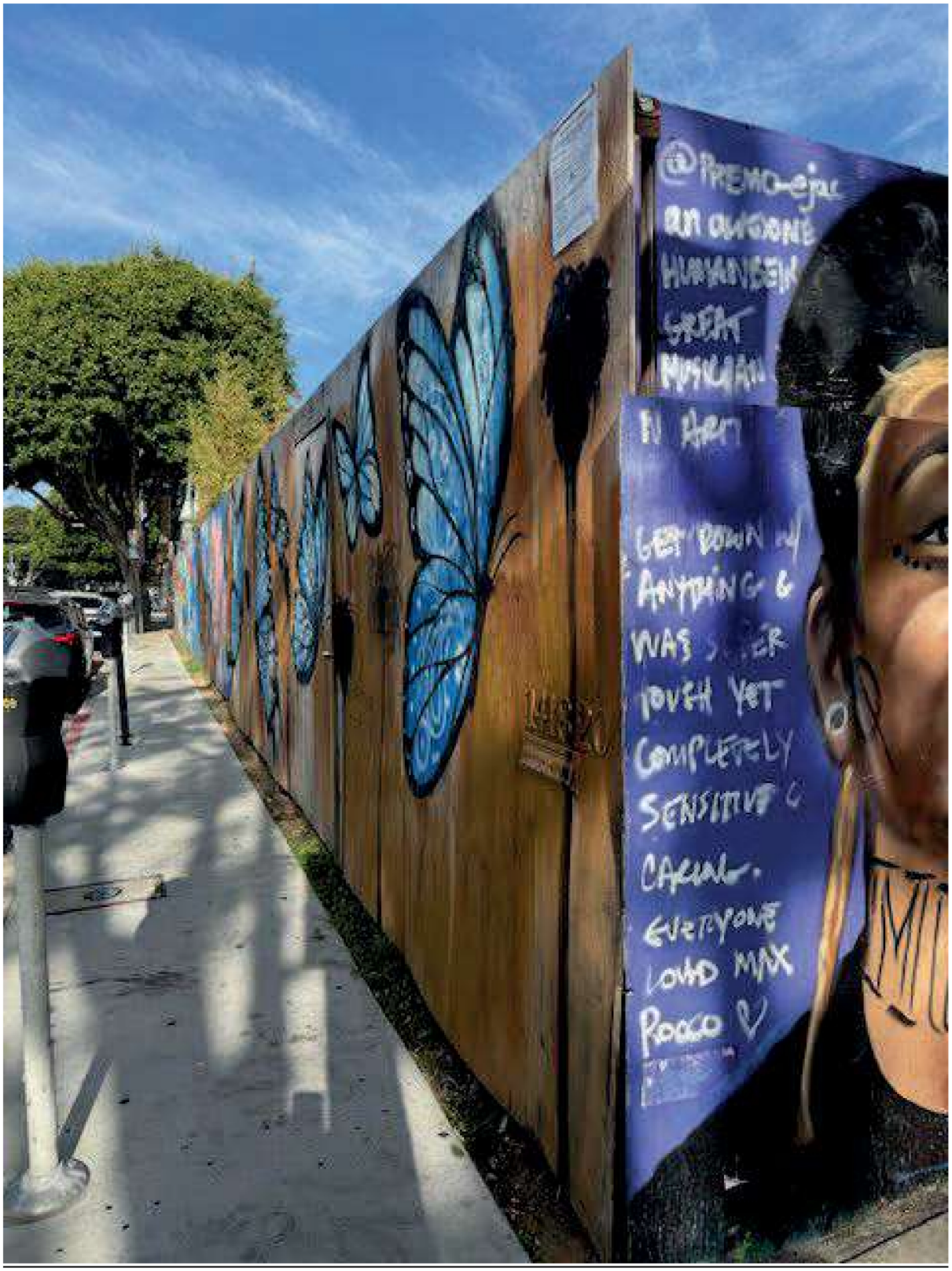
Alley (15′ wide)—from North/Horizon Ave. Note: 2 normal sized cars cannot pass.



<u>Main Street frontage</u>—3 lots between 5-unit apartment building to the left and commercial building to the right.






GREAT
MUSICIAN
ANYTHING &
TOUGH YET
COMPLETELY
SENSITIVE &
CARING.
EVERYONE
LOUD MAX
POOCO

1422 Main St lot from Alley



1414 Main St lot, from Alley



1410 Main St lot from alley



Unpermitted structure in 1410 Main St vacant lot:



I. Existing Site Plan:



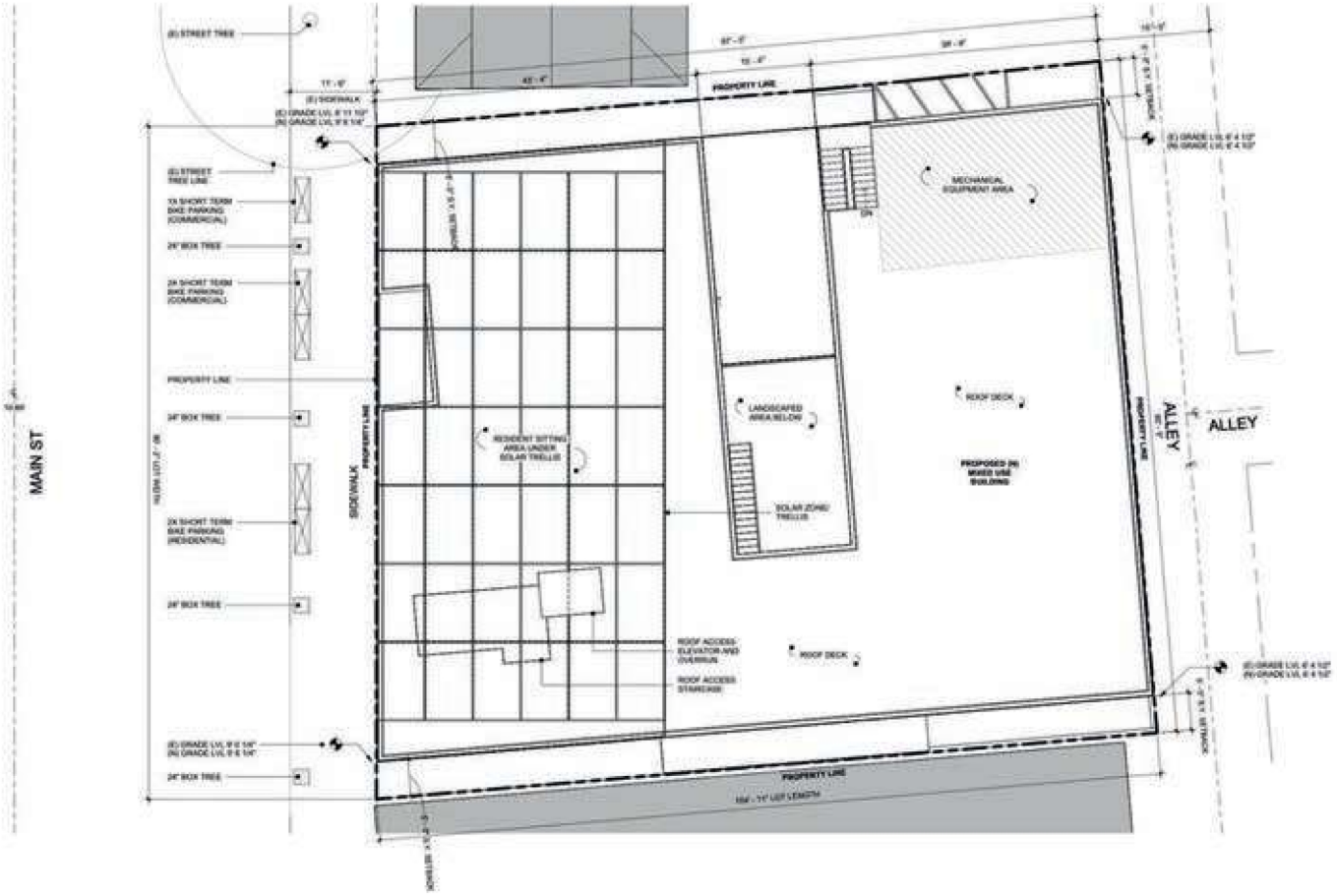
II. **Renderings of proposed project**




MAIN
APTS

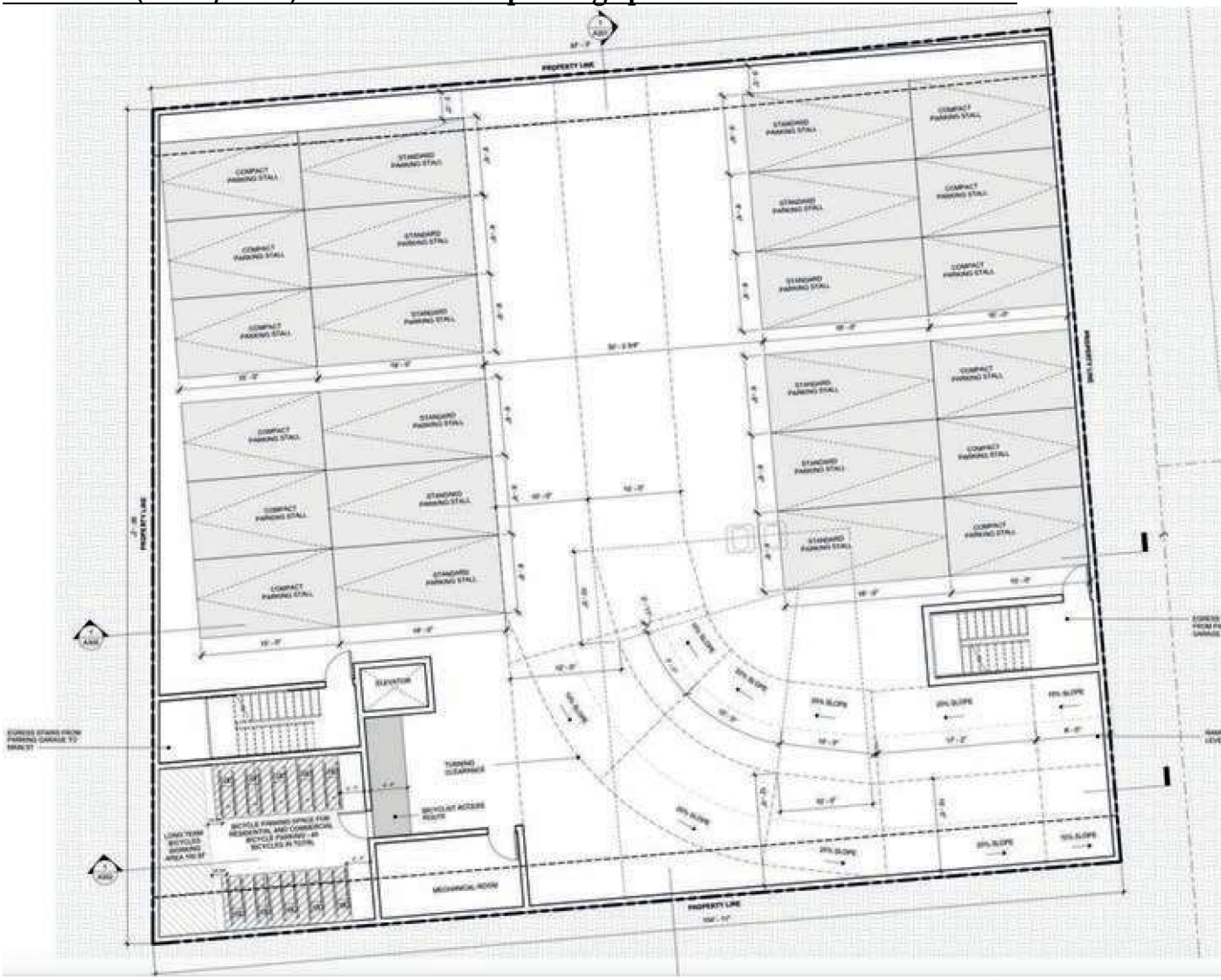

MAIN
APTS
RESTAURANT
RESTAURANT

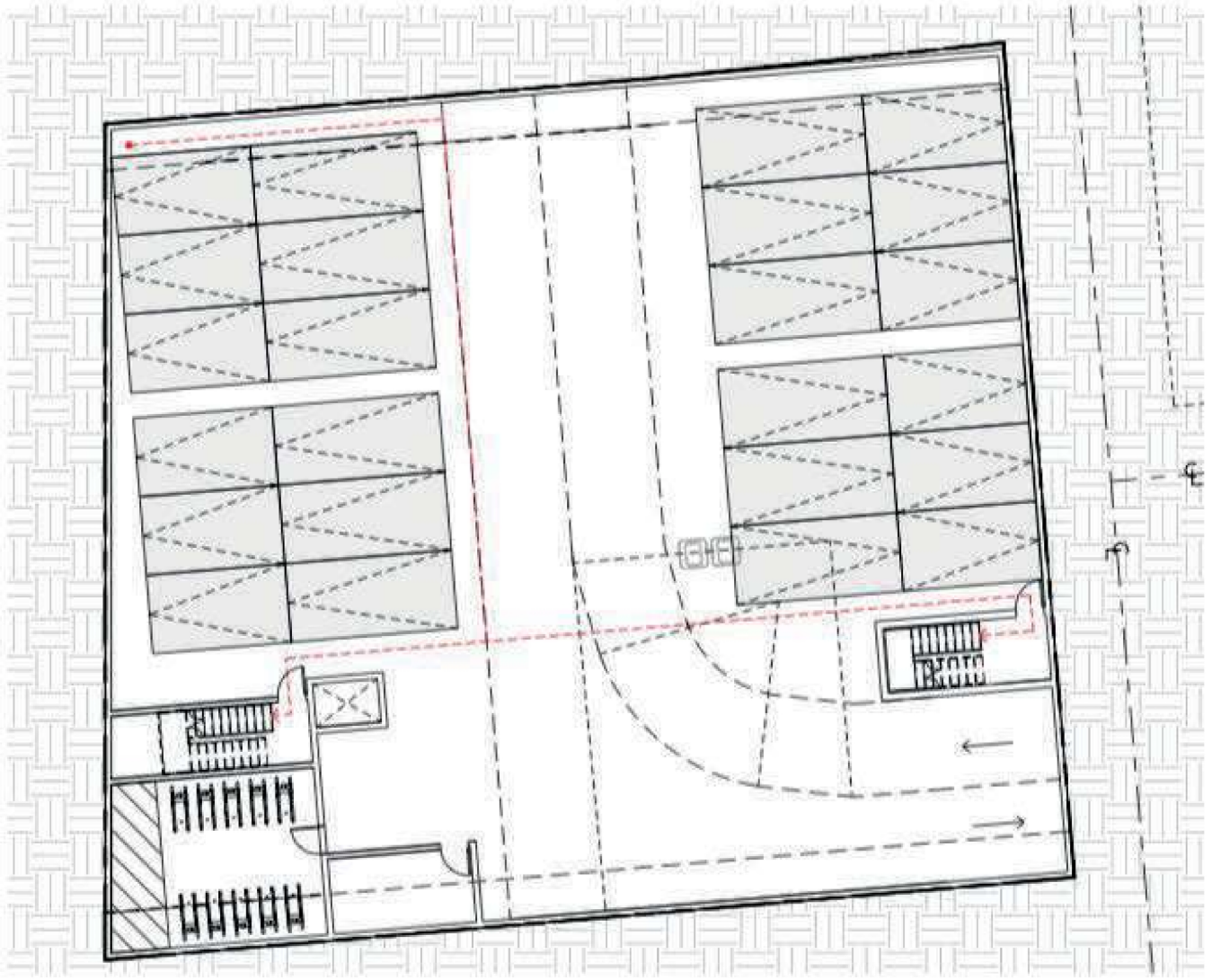
III. Site Plan:



IV. Floor Plans (detail/color)

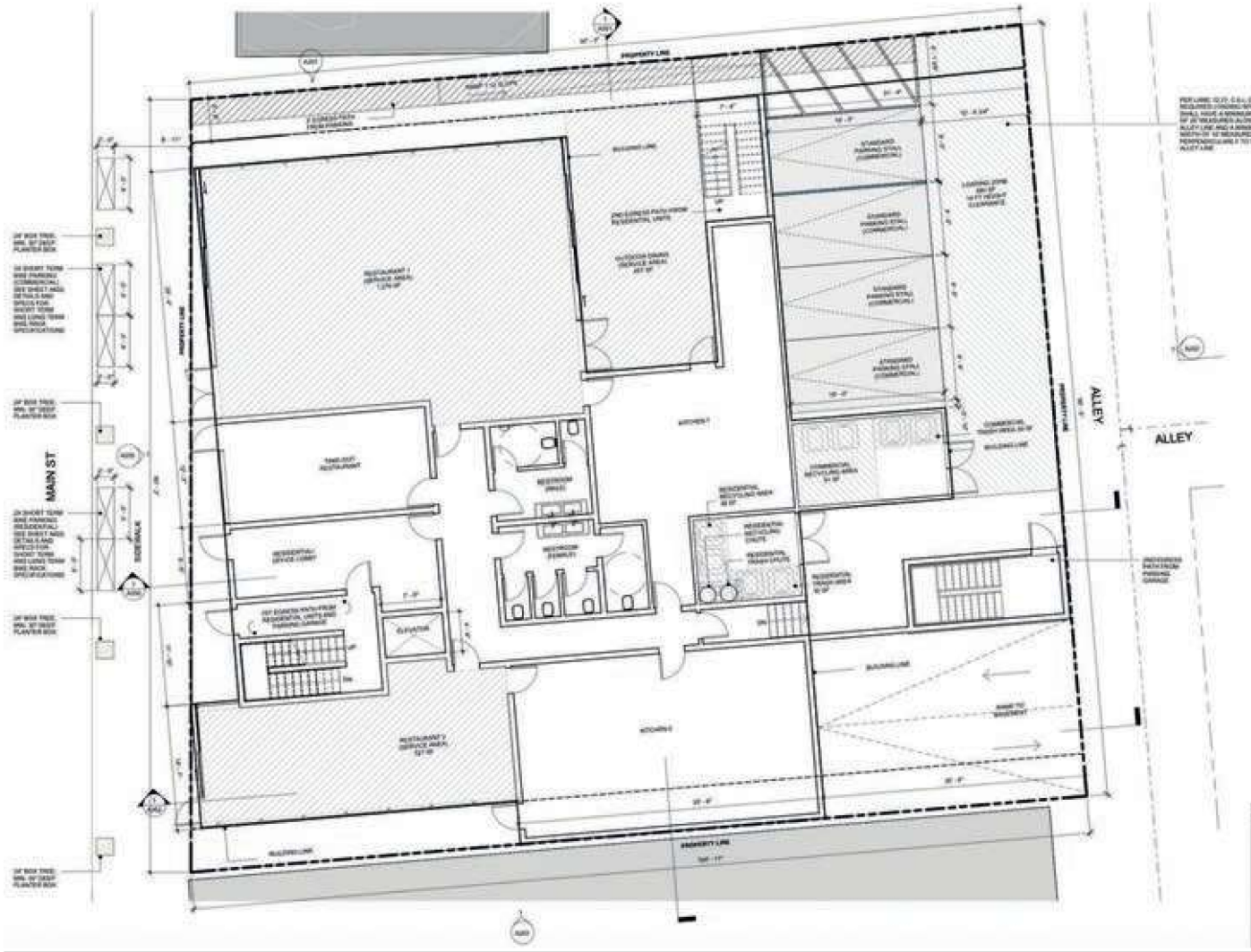
Basement (detail/color). Note 2 tandem parking spaces for each residential unit.





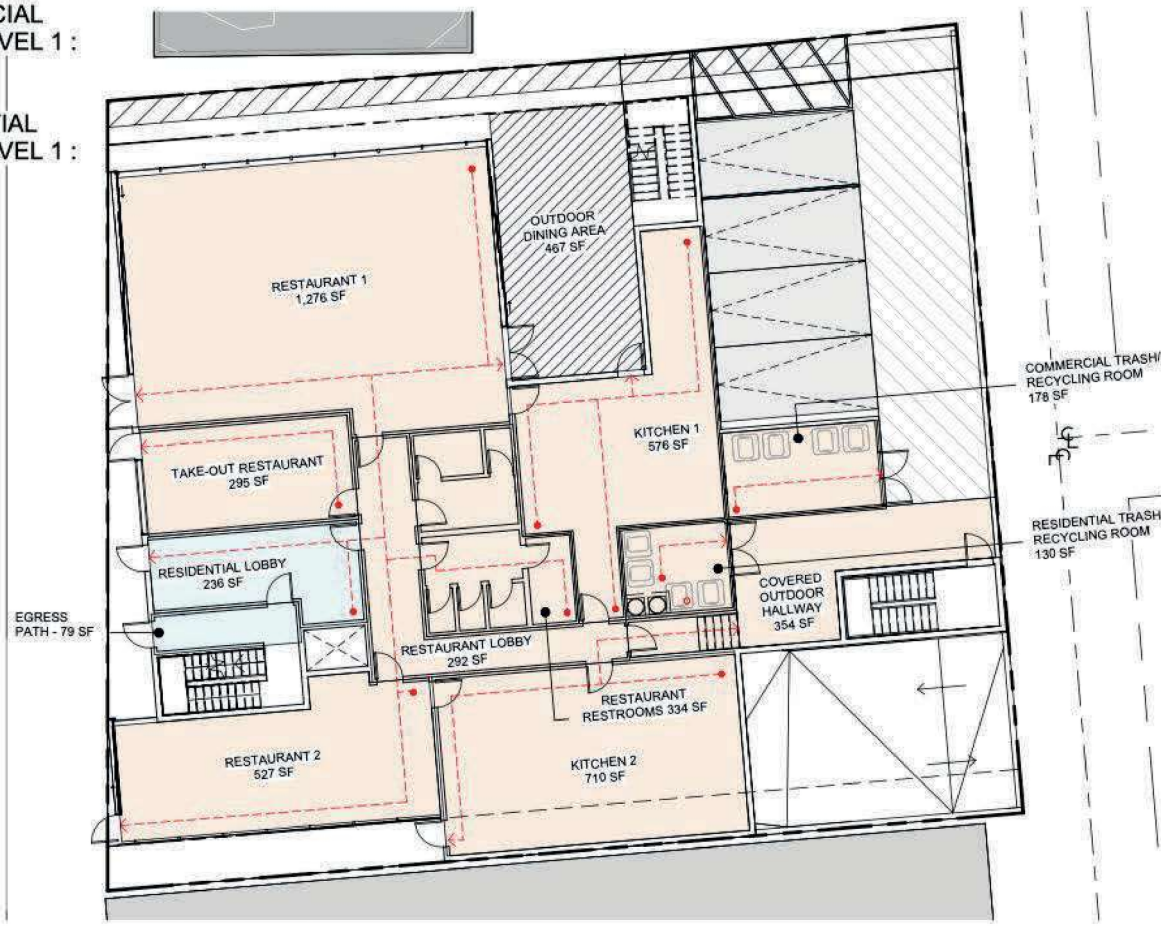
1 LV B1 PARKING - AREA PLAN
1/16" = 1'-0"

Ground Floor Plan (detail/color). Note 4 parking spaces for the restaurant, with loading zone behind.



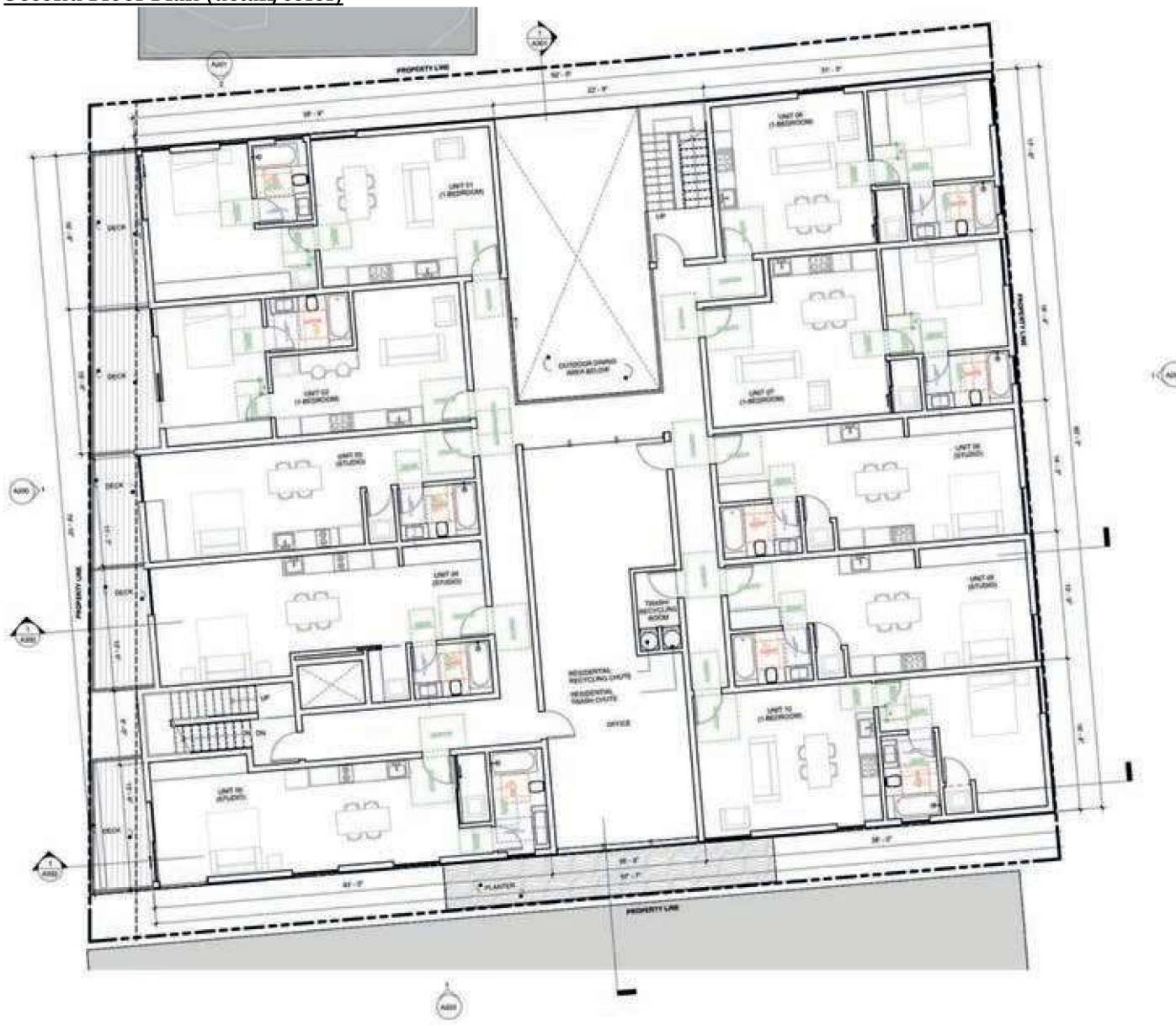
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 4,542 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 445 SF



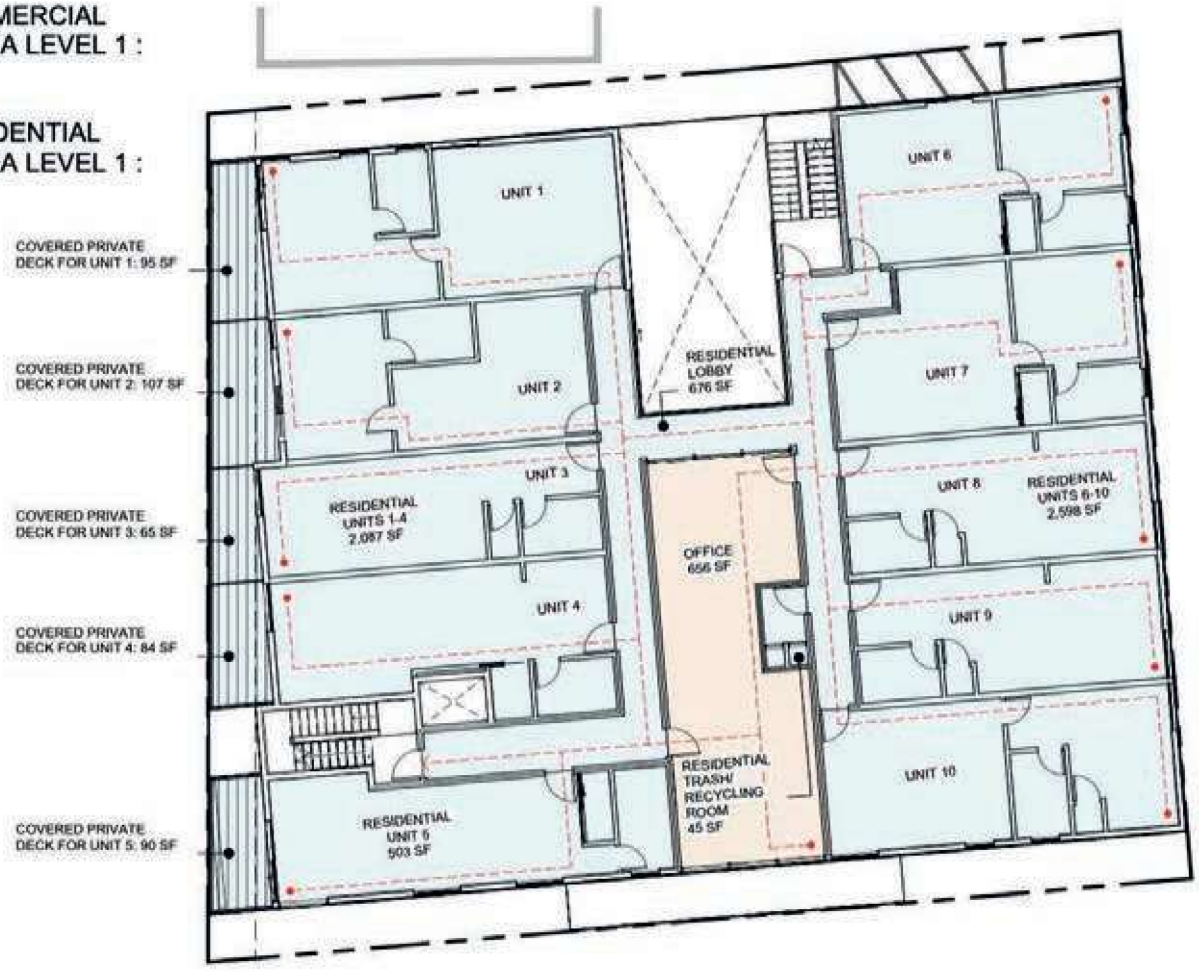
2 LEVEL 1 - AREA PLAN
1/16" = 1'-0"

Second Floor Plan (detail/color)



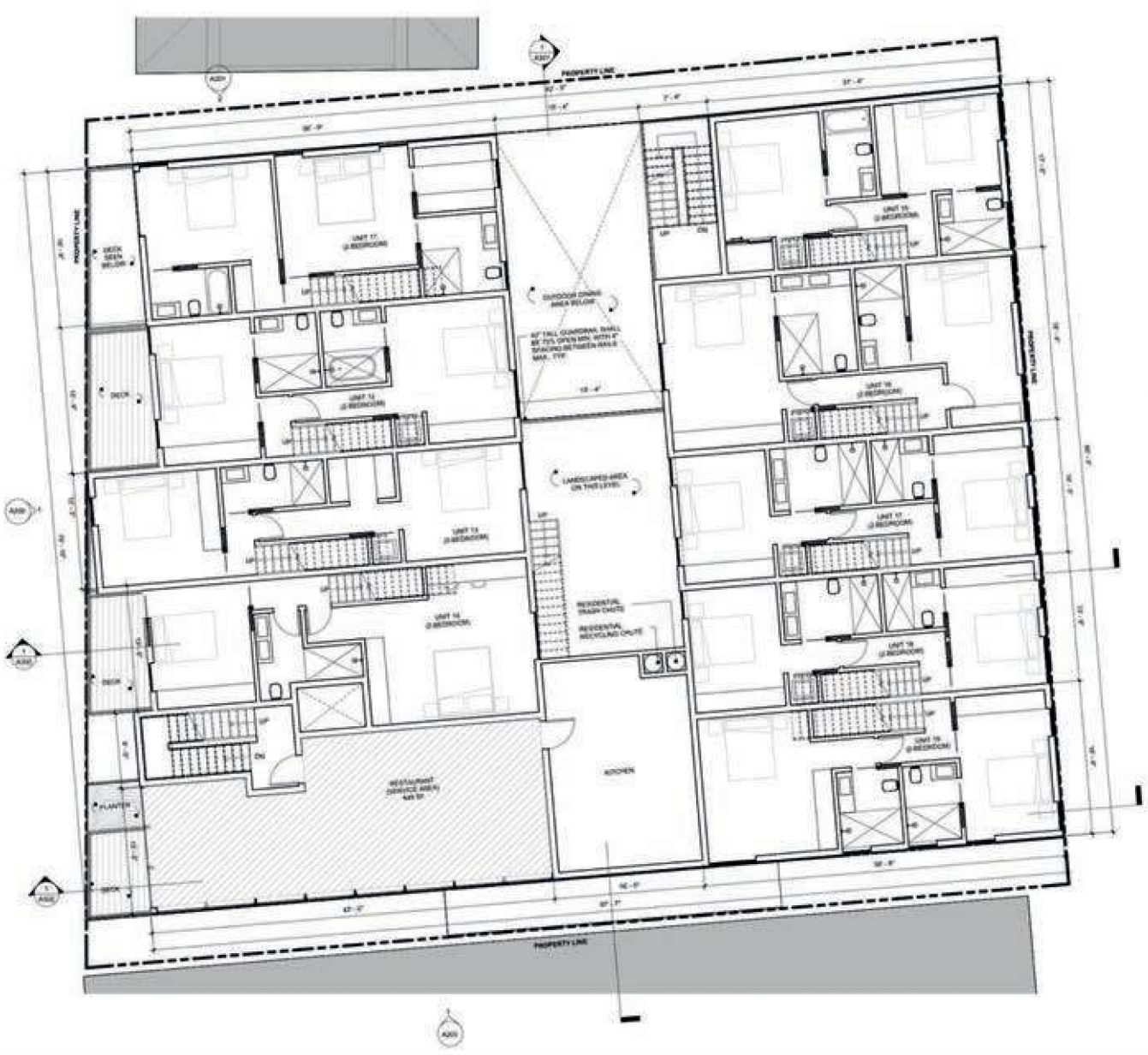
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 656 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 6,351 SF



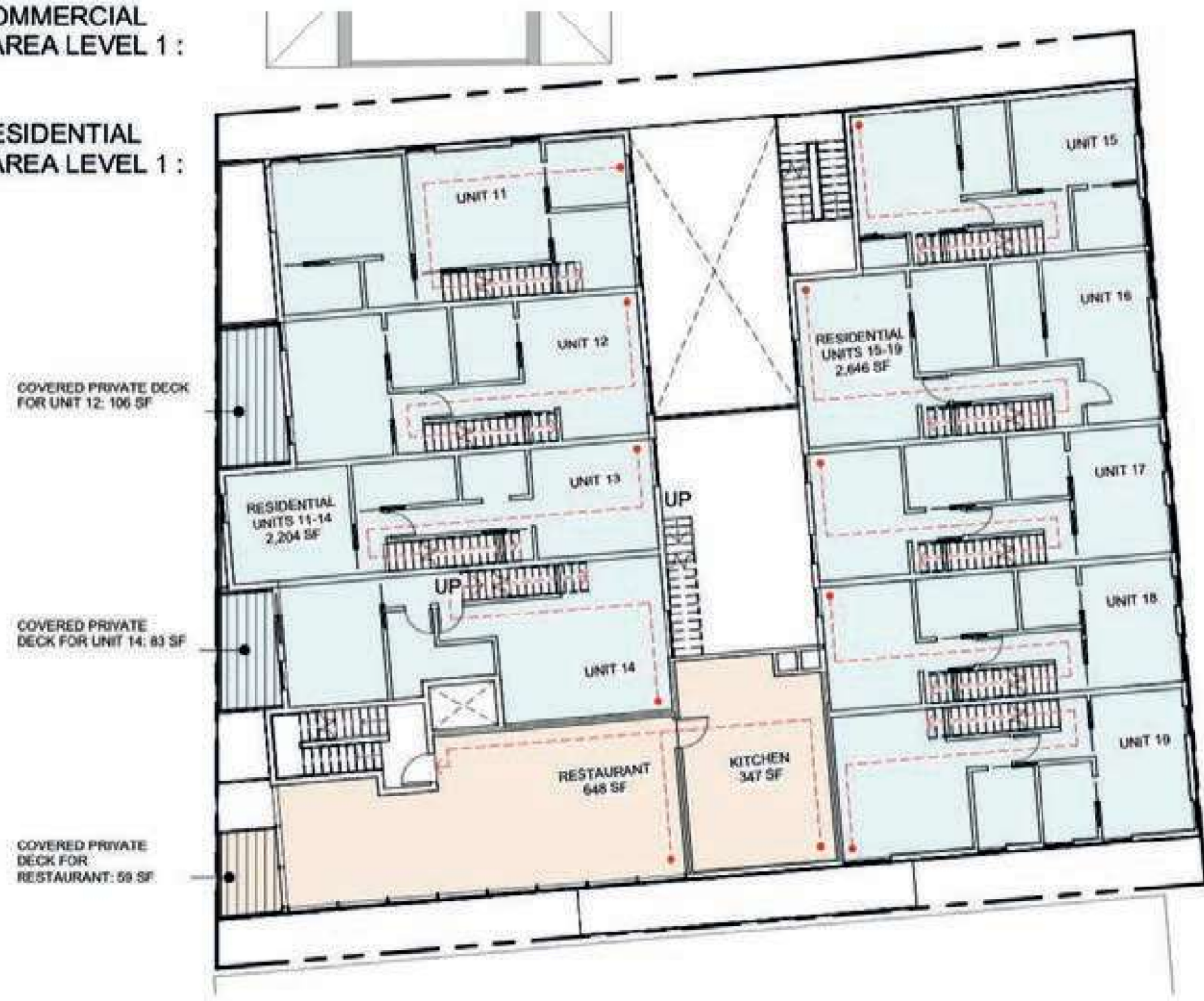
3 LEVEL 2 - AREA PLAN
1/16" = 1'-0"

Third Floor Plan (detailed/color)



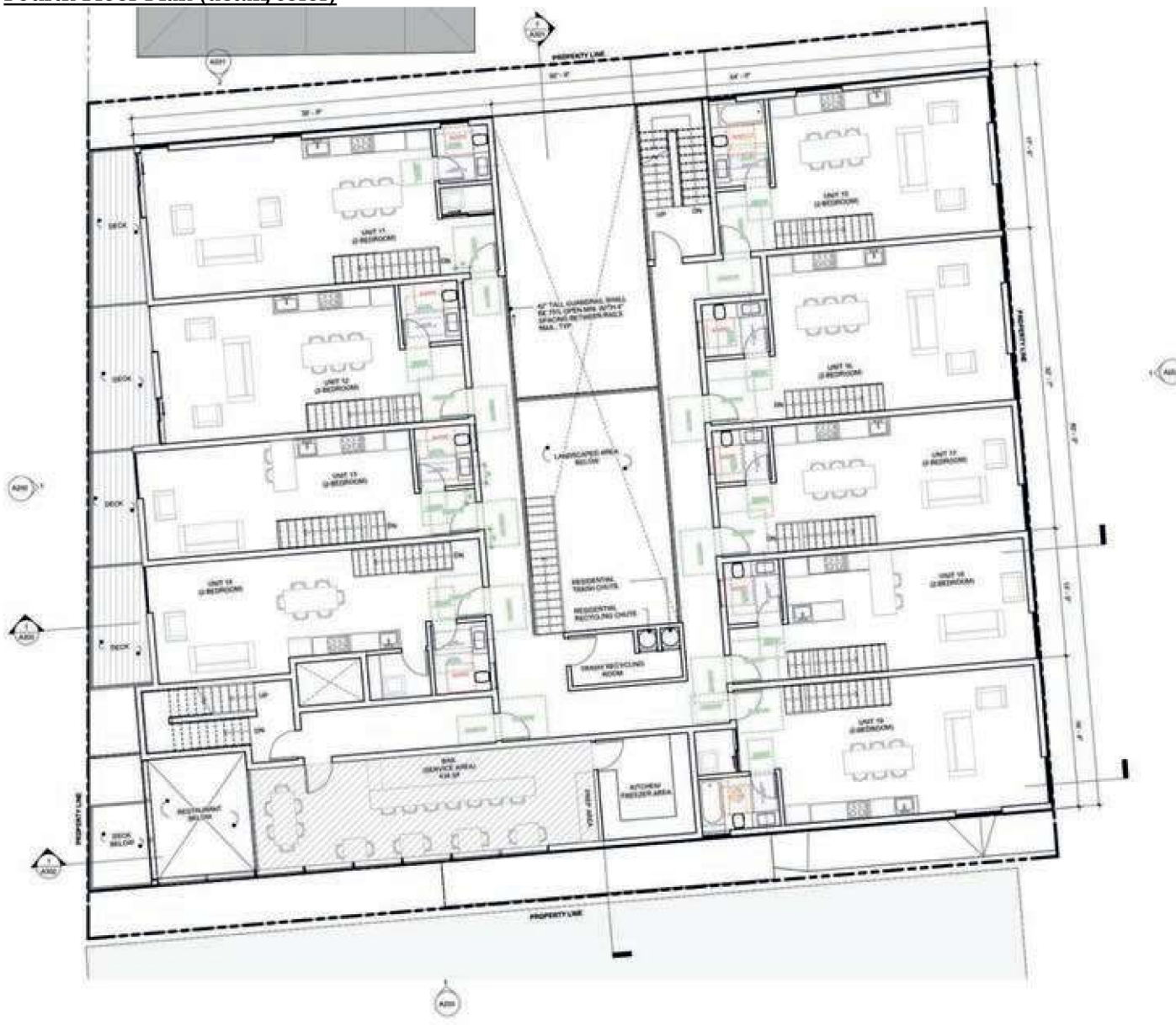
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 1,054 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,035 SF



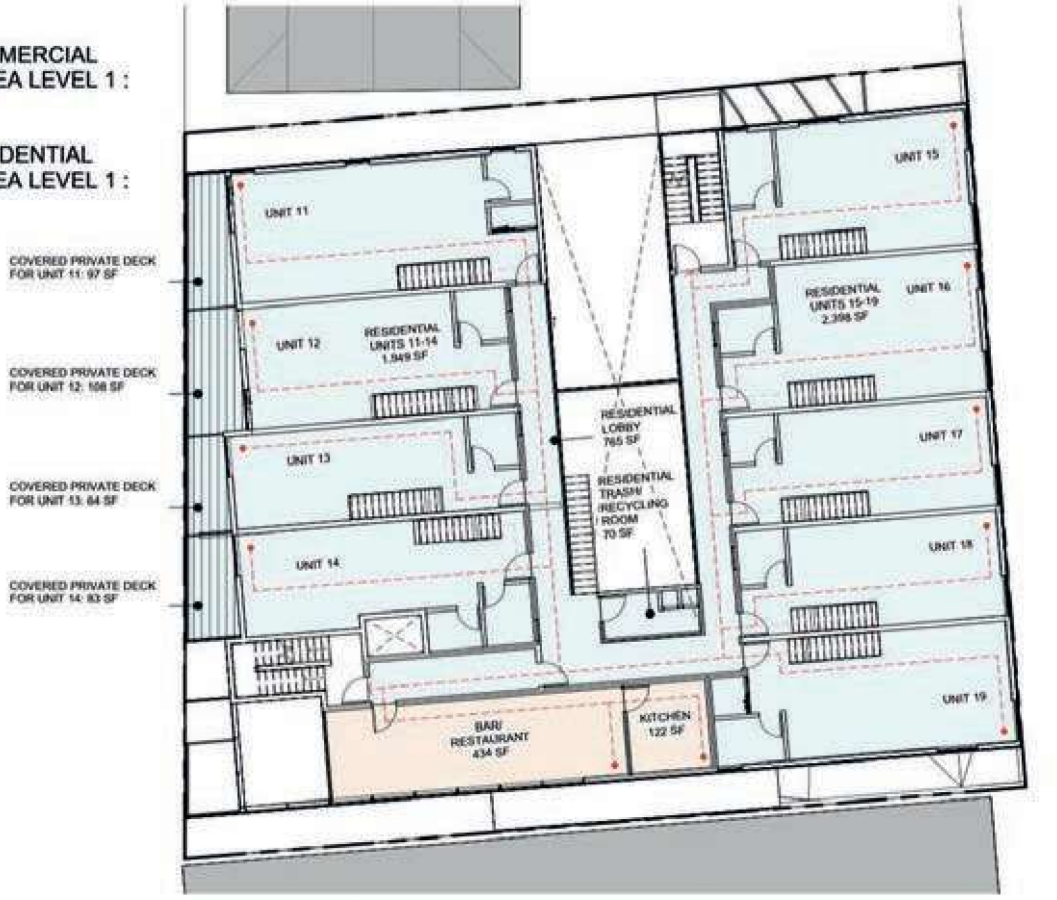
4 LEVEL 3 - AREA PLAN
1/16" = 1'-0"

Fourth Floor Plan (detail/color)



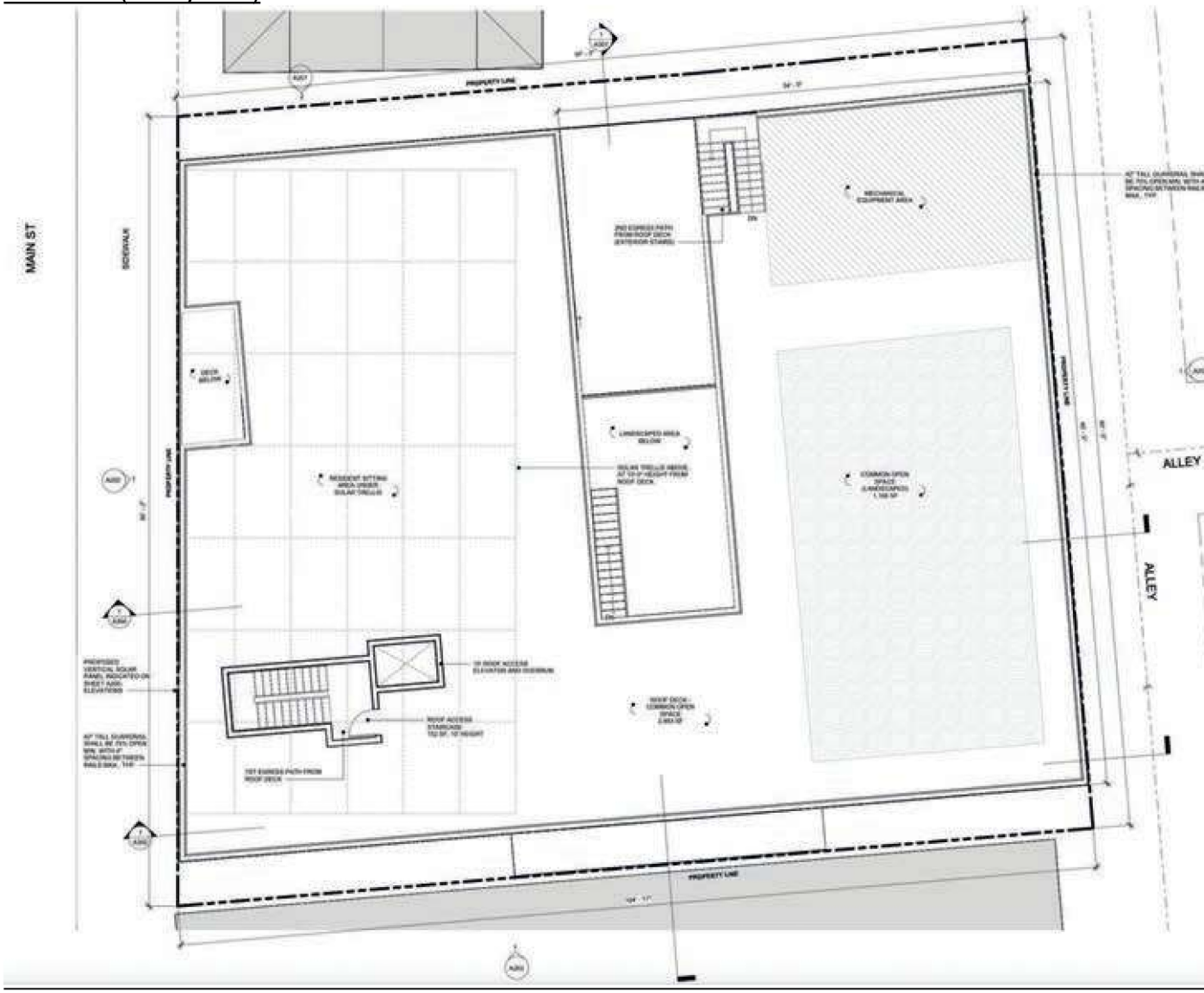
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 556 SF

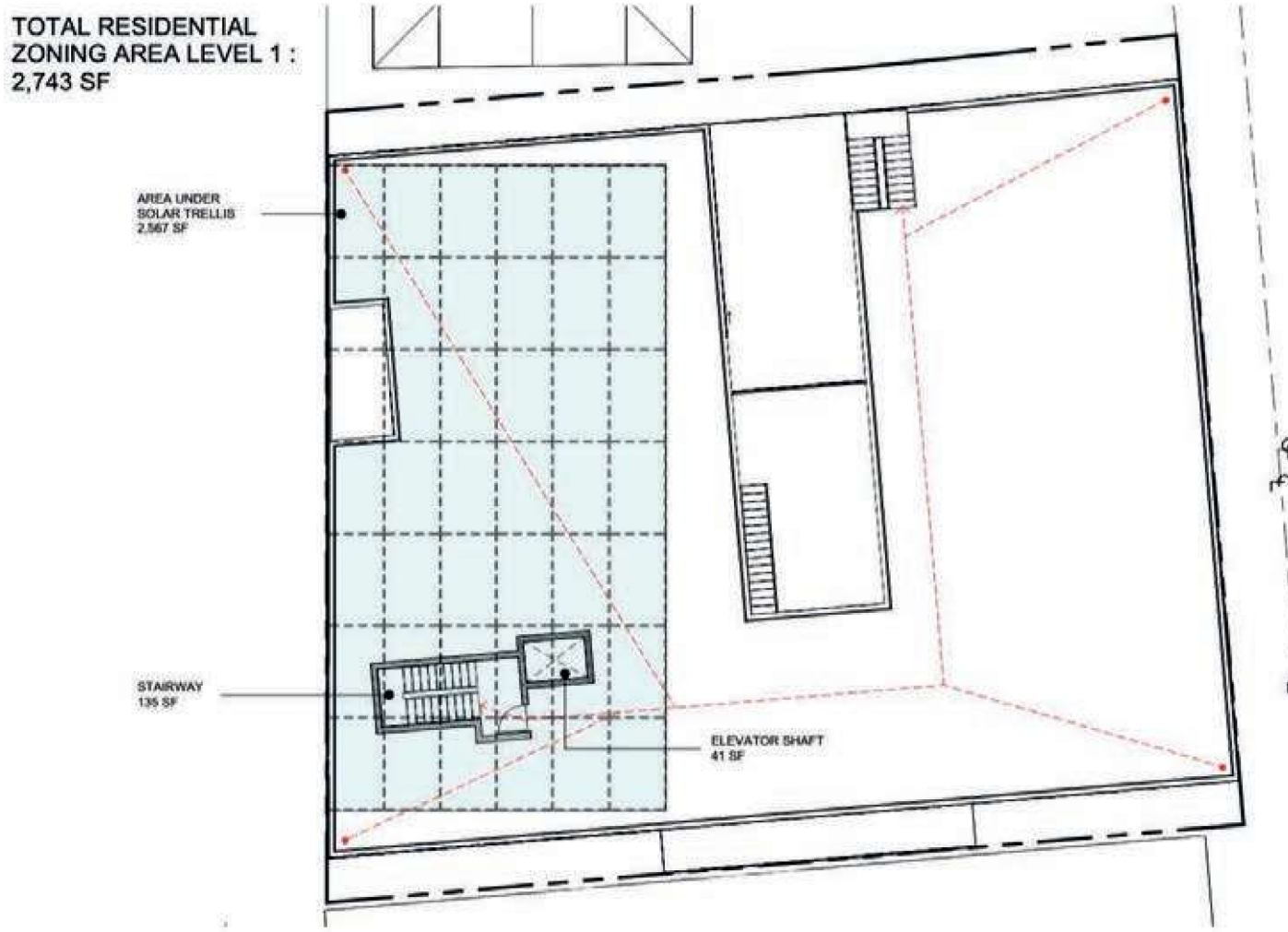
TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,463 SF



5 LEVEL 4 - AREA PLAN
1/16" = 1'-0"

Roof Plan (detail/color)

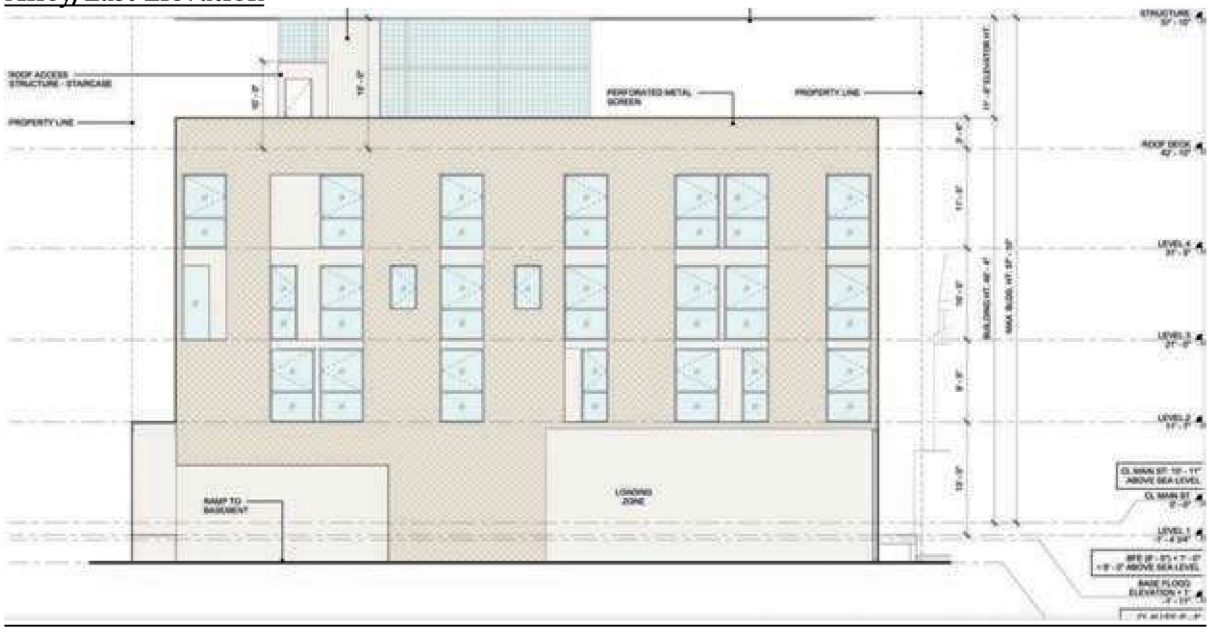




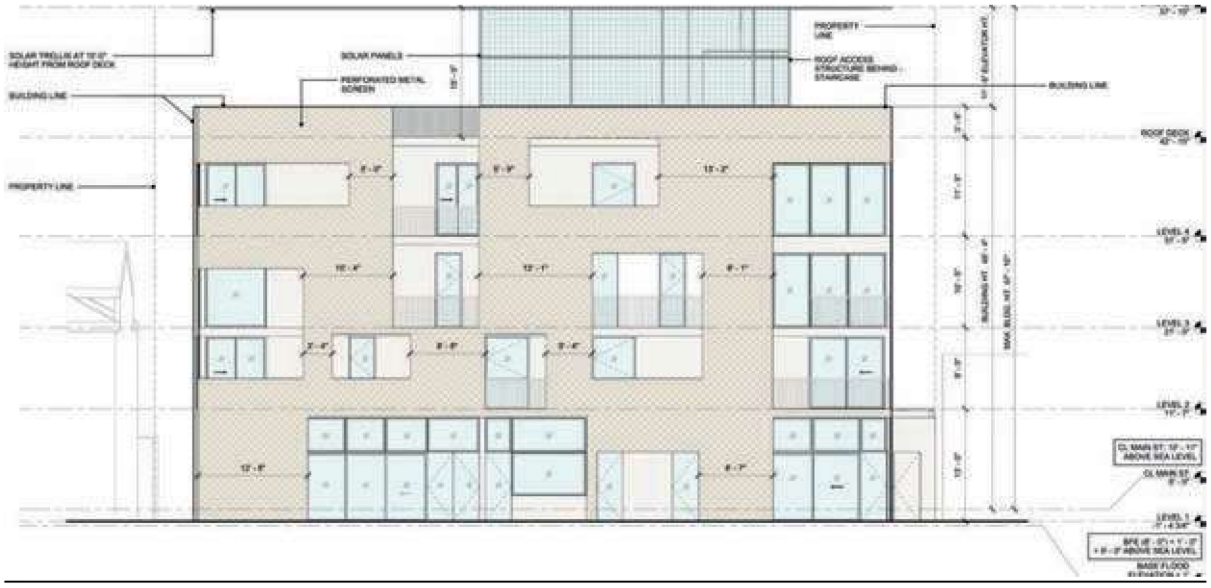
6 ROOF DECK - AREA PLAN
1/16" = 1'-0"

V. Elevations:

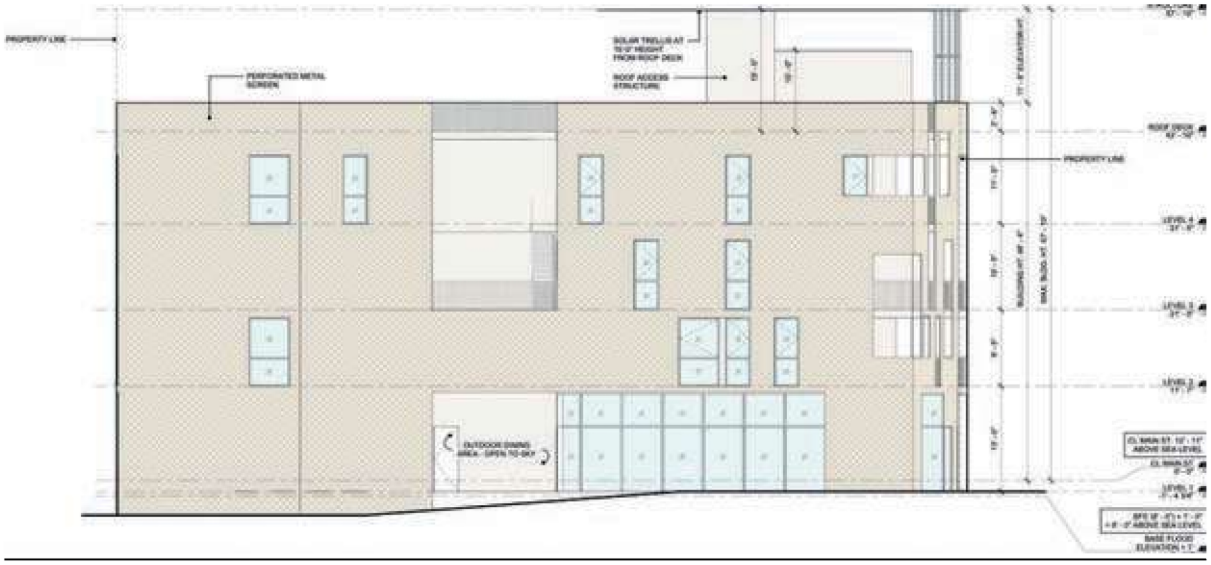
Alley/East Elevation



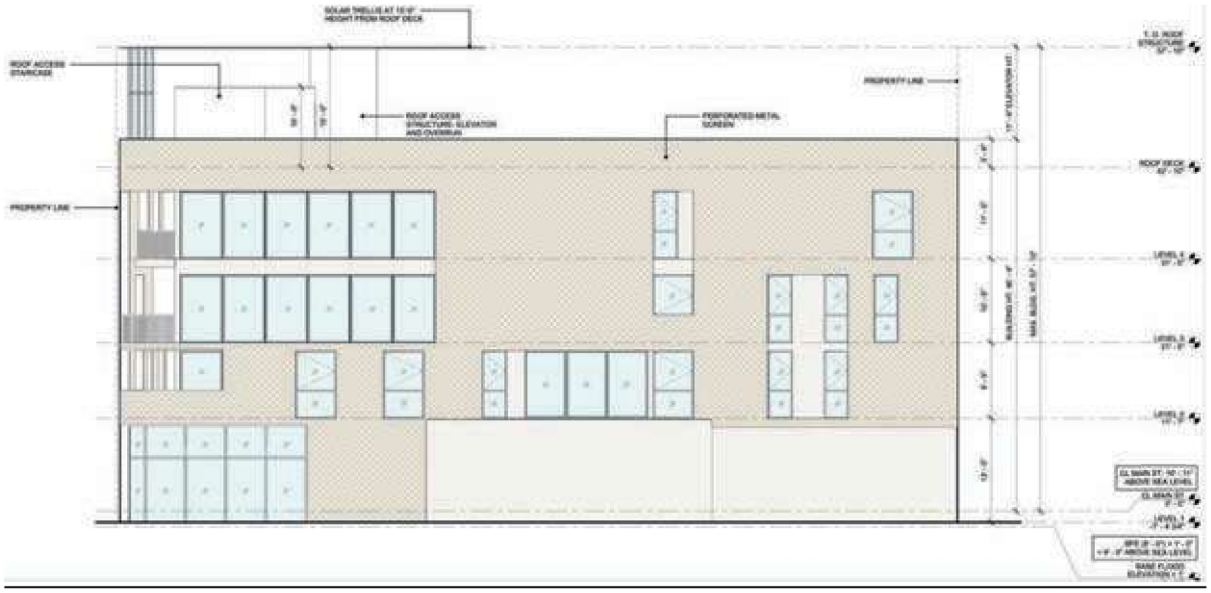
Frontage on Main Street/West Elevation



North Elevation



South Elevation



ATTACHMENT I

CALIFORNIA WOMEN'S LAW CENTER

Venskus & Associates
A PROFESSIONAL LAW CORPORATION

May 4, 2021

CPC-2019-7393-CA
ENV-2019-7394-ND

Re: Mello Act Ordinance must not allow demolitions/conversion of residential structures for purposes of mixed-use projects

Dear Los Angeles City Planning Commissioners:

The California Women's Law Center ("CWLC") is a non-profit law and policy center whose mission is to create a more just and equitable society by breaking down barriers and advancing the potential of women and girls through transformative litigation, policy advocacy and education. We focus on addressing economic justice, gender discrimination, violence against women, and women's health.

Venskus & Associates, APC is a boutique law firm litigating in the areas of housing rights and environmental/land use. The law firm represents and advocates for traditionally under-represented plaintiffs, such as low-income tenants, community organizations and environmental groups.

We write to urge the Los Angeles City Planning Commission ("Planning Commission") to ensure that its proposed Mello Act Ordinance (CPC-2019-7393-CA) does not:

- exceed the City's jurisdiction by conflicting with, or changing the meaning of, state law;
- run afoul of the Settlement Agreement Concerning Implementation of the Mello Act in the Coastal Zones within the City of Los Angeles ("Settlement Agreement");
- establish a law that is weaker than the City of Los Angeles' ("City") Mello Act Interim Administrative Procedures ("IAP").

The Settlement Agreement provided that the City must adopt Interim and Permanent Ordinances to implement both the Mello Act and the provisions of the Agreement. In response, the City adopted the IAP in 2000. In 2015, the City Council requested that City Planning prepare a permanent ordinance, but one was not adopted at that time. In April 2019, the City Council directed the Planning and Housing Departments to prepare and present a permanent ordinance to implement the Mello Act. In December 2019, the City's proposed Mello Act Ordinance was released. On February 25, 2021, the Planning Commission reviewed the proposed ordinance, but the vote was continued to May 13, 2021.

1

Adopting a permanent ordinance is an important step to protect housing stock including, specifically, affordable and Rent Stabilized (RSO) housing in the City's coastal zones, and to prevent displacement of people and communities. The ordinance must be in accordance with controlling state law and the Settlement Agreement. As currently proposed, the Mello Act Ordinance is not in accordance with controlling authority and thus exceeds the City's jurisdiction.

I. The purpose of the Mello Act is to preserve residential structures in the coastal zone, to protect existing affordable housing, and to provide new affordable housing

As stated in the IAP, under the Mello Act each local jurisdiction shall enforce three basic rules—

1. maintain existing residential structures,
2. replace converted or demolished affordable units
3. provide inclusionary residential units in new housing developments.

However, by adding clause 12.21.H.c.7. Mixed Use in the draft Mello Act Ordinance, the City is not honoring the first requirement, which states:

> "Existing residential structures shall be maintained, unless the local jurisdiction finds that residential uses are no longer feasible." (IAP pg. 7.)

California courts also have made clear that the Mello Act's purpose is to preserve housing in the Coastal Zone. The Court of Appeal stated that the purpose of the Mello Act is:

> "to preserve residential units occupied by low or moderate-income persons or families in the coastal zone."[1]

The California Supreme Court similarly explained that:

> "[t]he Mello Act supplements the housing elements law, establishing minimum requirements for housing within the coastal zone for persons and families of low or moderate income."[2]

In fact, the Mello Act specifically mentions the housing elements state law, making it clear that the Mello Act is a law that protects housing for all income levels and certainly not one that would allow for non-residential uses. One of the main avenues the Mello Act proscribes for protecting residential housing is to limit the ability to convert existing residential structures to non-residential uses. To allow such conversions would not only violate both the letter and the spirit of the Mello Act, but it would plainly threaten housing, by allowing its destruction for purposes of a more lucrative commercial use, including mixed use projects, thus displacing families and damaging coastal communities that are already holding on by a thread—exactly what the Mello Act was intended to prevent.

[1] *Venice Town Council v. City of L.A.*, 47 Cal. App. 4th 1547, 1552-53 (1996).
[2] *Pacific Palisades Bowl Mobile Estates, LLC v. City of Los Angeles*, 55 Cal. 4th 783, 798 (2012) (emphasis added).

The Mello Act states:

> "The conversion or demolition of any **residential structure** for purposes of a nonresidential use which is not 'coastal dependent,' as defined in Section 30101 of the Public Resources Code, shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."

This language is repeated in IAP section 4.1 (also covered in the Settlement Agreement, section VI.C.1.):

> "The Mello Act states that the Demolition or Conversion of **residential structures** for the purposes of a non-Coastal-Dependent, non-residential use is prohibited, unless the local jurisdiction first finds that a residential use is no longer feasible at that location."

II. As proposed, the draft Mello Act Ordinance exceeds the City's jurisdiction and violates the Settlement Agreement

The draft Mello Act Ordinance exceeds the City's jurisdiction. Under article XI, section 7 of the California Constitution, "[a] county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws."[3] The Mello Act is a state statute; therefore, any attempt to enact an ordinance in conflict with it is in excess of the City's authority.

The City must also comply with the Settlement Agreement in enacting the Mello Act Ordinance. The permanent ordinance must be consistent with both the Mello Act and the provisions of the Settlement Agreement. Adopting an ordinance that is contrary to the provisions of the Settlement Agreement would be in violation of the Settlement Agreement itself.

III. Words have meaning: terminology in land use law is specific

The draft Mello Act Ordinance new proposed provision (LAMC 12.21H.c.7.) for conversion to mixed uses changes the meaning and application of the Mello Act by stating:

> "Mixed Use Development. A proposed mixed use development may not result in a net reduction in the total number of existing Residential Units unless a residential use is no longer feasible. A mix of uses is permitted, so long as the structure provides all required Replacement Affordable and Inclusionary Units."

This new provision would allow for the conversion of one hundred percent residential structures to non-residential mixed uses and by doing so, change the meaning, spirit, and purpose of the Mello Act. This change is in direct violation of the Mello Act and the Settlement Agreement, which explicitly forbid the conversion of a residential structure to a non-residential use.

[3] *Sherwin-Williams Co. v. City of L.A.*, 4 Cal. 4th 893, 897 (1993).

This new conversion provision included in the draft Mello Act Ordinance essentially changes the Mello Act, as follows:

> "Conversion or demolition of any ~~Residential Structure~~ **residential unit or residential use**, for purposes of a non-residential use that is not Coastal-Dependent, is prohibited, unless a residential use is no longer feasible at that location."

This new provision has the effect of replacing the word "structure," as used in the Mello Act, the Settlement Agreement and IAP, with "unit or use." The words "structure" and "unit" are not interchangeable. Nor are the words "unit" and "use." The word "structure" refers to an entire building as an entity, while the word "unit" refers to an individual dwelling, which may be one of many within a single structure. This is an important distinction, because the use of the word "structure" in both the Mello Act and the IAP intentionally protects the entire residential building.

The terminology used in land use law is specific and purposeful. The use of "unit" in the Mello Act pertains to sections of the law related to protecting existing affordable housing or providing inclusionary affordable housing, whereas "structure" relates to the protection of housing from the desires of developers for more lucrative commercial uses, including mixed use.

A residential structure in a commercial zone may also not be changed to a mixed use, as the Mello Act specifically protects housing regardless of zoning. Furthermore, the definition of a "residential structure" does not include "mixed use," which is considered a commercial use and is restricted to commercial zones. A "residential structure," on the other hand, is permitted in both residential and commercial zones. They are far from equivalent. Therefore, the substitution of "unit or use" in the proposed ordinance amounts to a sleight of hand, *apparently to promote the substitution of mixed use structures in place of residential structures*. This was clearly not the intent of the clear and carefully chosen language of the Mello Act, the Settlement Agreement and the IAP.

Municipalities are permitted to strengthen the local implementation of a statute, but not to weaken it. As per the Mello Act, Government Code Section 65590(k):

> …[t]his section establishes minimum requirements for housing within the coastal zone for persons and families of low or moderate income. It is not intended and shall not be construed as a limitation or constraint on the authority or ability of a local government, as may otherwise be provided by law, to require or provide low- or moderate-income housing within the coastal zone which is in addition to the requirements of this section.

The present use of the term, "residential structure" protects an entire building, whereas "residential unit or use" does not, necessarily. It would therefore weaken the implementation of the statute and is thus beyond the jurisdiction of the City.

IV. Conversion to mixed use is used as loophole to allow unpermitted conversions to commercial uses

The result of the change in terminology will destroy housing by allowing for conversion to commercial uses. Replacing the word "structure" with the words "unit" or "use" is beyond the jurisdiction of the City because it contradicts the Mello Act, a state law.

The City's Mello Act Ordinance must also comply with the Mello Act's intent. Since this new mixed use provision would effectively change the meaning, in direct contradiction to the Act's intent, the City would be acting in excess of its jurisdiction.

The harm from the City's attempt to exceed its jurisdiction by allowing conversion or demolition of residential structures for purposes of non-residential use is not just theoretical. Several recent projects have already seized on the current, draft language of the proposed Mello Act Ordinance, regarding "residential units" or "residential uses," to justify approval of the conversion of residential properties to mixed-use properties. Many of these properties have then illegally converted the entire structure to commercial, non-residential use, with no consequence.

Thus, already the use of "units or uses" rather than "structures" has created a loophole to allow developers to convert one hundred percent residential use structures to "mixed use" and then fail to actually maintain any residential uses, in violation of state law and the Settlement Agreement.

A. Example #1: 1214 Abbot Kinney Blvd.

First, for the property at 1214 Abbot Kinney Blvd., in 2014, the City approved a change of use from residential to mixed use, in violation of the Mello Act. Since then the property has been used illegally as commercial office use, even though it was only approved for conversion to "mixed use." Yet another example of ongoing use of residential structures for commercial use is 619-701 Ocean Front Walk, aka Thornton Lofts. When the tech industry moved in they took over residential structures for offices. There are numerous other similar examples of unpermitted mixed uses or full commercial uses where the structures are only permitted for residential use.

B. Examples #2 & #3: 811-815 Ocean Front Walk, and 1310 Abbot Kinney Blvd.

Other Coastal Zone projects are pending that would violate the Mello Act by allowing demolition of 100% residential structures for purposes of a mixed-use development. One example is the project at 811-815 Ocean Front Walk, which proposes the demolition of three residential structures for purposes of a mixed-use commercial development. Another example is the project proposed at 1301-1303 Abbot Kinney, which is requesting a change of use from a 100% residential triplex structure to two live/work mixed use units. The approvals of both of these projects have been appealed. If these projects are ultimately approved by the City it will be in clear violation of the state Mello Act and the Settlement Agreement. There are other examples where the City approved a residential structure to be replaced by "artist in residence" use, a mixed use, but they do not meet the code's definition of artist and thus the structures have become essentially all commercial use.

C. Example #4: 1047 Abbot Kinney Blvd.

One final example is the three bungalows at 1047 Abbot Kinney Blvd., which have certificates of occupancy as residential units but have for years been illegally used for a non-residential use. The City recently approved the demolition of those bungalows for purposes of the Venice Place mixed use project, for which they will be covered by the hotel's CUB, and they will be included in the hotel buildings, very likely losing their identity as housing.

These examples illustrate that because the as-now-proposed Mello Act Ordinance provisions regarding conversion to mixed use contradict the Mello Act's language and intent to protect housing, developers have exploited, are currently exploiting, and will likely continue to exploit this "mixed-use" loophole to effectively destroy residential housing, including and especially affordable housing for low-income residents and communities of color, thus causing a gross, unacceptable, adverse cumulative impact on housing, including affordable housing, in the Los Angeles Coastal Zones.

All of this is an unfortunate, perhaps unconscious, continuance of the City's practices of institutional racism.[4]

V. If not amended, the draft Mello Act Ordinance will disproportionately harm low income communities of color in the Coastal Zone as new mixed use development will be encouraged

The impact of the destruction of housing that has and will continue to result from the Mello Act Ordinance if the ability to convert residential structures to mixed uses is not eliminated, disproportionately harms communities of color. In 2017, California had nearly two million rent burdened households of color that spent more than thirty-percent of the household income on rent and utilities.[5] There were also 1.6 million extremely low-income renter households, two-thirds of which were households of color.[6] During the COVID-19 pandemic, there has been a disproportionate financial impact on populations of color, which has created even greater disparities.[7] All housing will be put in jeopardy in the Coastal Zone if the draft Mello Act Ordinance is not amended to prohibit demolition or conversion of residential structures for purposes of mixed use developments, and those who will be impacted most are low-income people and communities of color.

This is especially true because by allowing such mixed use developments to replace residential structures the current draft of the Ordinance actually encourages, rather than discourages,

---

[4] On top of these egregious practices, the City has a pattern and practice of using the rent paid by existing unpermitted commercial uses (this was done for 1301-1303 Abbot Kinney and 1047 Abbot Kinney, among many others) to determine whether affordable housing must be replaced, a a gross double violation of the Mello Act and a practice that the City must never allow, and yet it openly does allow it.

[5] AMEE CHEW & CHIONE LUCINA MUÑOZ FLEGAL, POLICY LINK, FACING HISTORY, UPROOTING INEQUALITY: A PATH TO HOUSING JUSTICE IN CALIFORNIA 14 (2020), https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf.

[6] *Id.*

[7] *See* Kelly Anne Smith, *Covid and Race: Households of Color Suffer Most From Pandemic's Financial Consequences Despite Trillions in Aid*, FORBES (Sept. 17, 2020), https://www.forbes.com/advisor/personal-finance/covid-and-race-households-of-color-suffer-biggest-pandemic-consequences/.

displacement. With the "mixed use" loophole, developers are encouraged to demolish the building and erect a new building in its place, thus displacing families currently living in older housing stock which is always, by definition, more affordable than new units deemed "affordable" pursuant to federal and state law. It makes no sense for the City to encourage destruction of existing housing, including affordable housing, so that more lucrative commercial mixed use projects can be built in the Coastal Zone, especially when such a concept runs completely contrary to the Mello Act's intent. This would be a boon to developers and would cause a steady stream of property owners getting richer on the backs of our existing renters in the L.A. Coastal Zones as they will be displaced when mixed use projects replace residential structures.

VI. Conclusion

We understand that the City's priority is to increase housing, but it must be done within the confines of the law and not by allowing conversions of residential structures to mixed use, in violation of the Mello Act.

We too support mixed use developments, but only where they replace existing commercial uses and thus add housing.

The Mello Act's purpose is to protect all housing in the Coastal Zone, as well as to protect existing and provide for new affordable housing.

For the foregoing reasons, we respectfully urge you to eliminate any and all proposed Mello Act Ordinance language that would allow for demolition or conversion of residential structures for purposes of non-residential/commercial mixed use projects, in order to comply with state law and the Settlement Agreement and to ensure the City is acting within its jurisdiction.

Sincerely,

Amy Poyer
Senior Staff Attorney

California Women's Law Center
360 N. Pacific Coast Hwy, Suite 2070
El Segundo, CA 90245
amy.poyer@cwlc.org

Sabrina Venskus
Partner

Venskus & Associates, A.P.C.
1055 Wilshire Blvd., Suit 1996
Los Angeles, CA 90017
venskus@lawsv.com

Venice Neighborhood Council

P. O. Box 550, Venice, CA 90294
www.VeniceNC.org

December 9, 2025

Sienna Kuo, Planning Assistant
Sienna.Kuo@lacity.org
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012

Re. 1410-1414-1422 Main Street, Venice
CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

Dear Sienna,

The following motions were approved by the Venice Neighborhood Council (VNC) Board at its December 9, 2025 meeting:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

and

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

.

7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.

The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.

The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10' minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade

directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.

The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.

The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.

The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.

The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing

small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Please contact Mark Mack, Chair of the VNC Land Use & Planning Committee, at Mark.Mack@VeniceNC.org should you have any questions related to this letter and these motions.

Sincerely,

Brian Averill, President
On behalf of the Venice Neighborhood Council

cc:
Mark Mack, Chair, VNC Land Use & Planning Committee
Shannon Vaughn, Coastal Program Manager, California Coastal Commission
Dani Ziff, District Supervisor, California Coastal Commission
Craig Bullock, Planning Director, Council District 11
Jeff Khau, Planning Deputy, Council District 11
Sean Silva, Venice Field Deputy, Council District 11
Ira Brown, City Planner
Tony Russo, Crest Real Estate
Nick Leathers, Crest Real Estate

Attachment: LUPC Staff Report

Good morning. My name is Rick Garvey, and I own the property at 234 Horizon. I have lived in the back house, directly facing the Toledo Court alley for 30 years and can testify to what a quiet residential block this is. I'm here to say loudly and clearly: this project does NOT belong in my alley. The alley in question is only 14' wide, and two cars cannot pass each other. I urge each of you to come visit the site and see for yourself, the alley is completely substandard for the uses they propose. It will create a dangerous situation for all the properties on Horizon and Market along the alley.

Since the applicant purchased these properties over 12 years ago, he has been a terrible neighbor who has tried to maximize his profits at the expense of our community over and over again. His first attempt in 2014 was to build a 46' building with 26 units and multiple commercial aspects, which faced unanimous opposition. They eventually withdrew the proposal and seemingly to spite the neighbors, evicted most of the current tenants, cut down a huge tree on the corner of Horizon and Main and constructed an illegal fence along Main Street taking up a good portion of the sidewalk that has been there ever since.

In subsequent years they repeatedly threw parties where alcohol was served without a permit, ran several units as illegal short-term rentals; and brought in huge shipping containers to use as live/work spaces in what they now claim has always been a vacant lot.

Then in 2021 they came back with a much smaller footprint: a 30' tall building with 9 units and a single restaurant. While not ideal, this project was approved by the VNC. Instead of pursuing this plan they waited 4 years and then quietly amended it with a vastly larger proposal. They attempted to completely bypass the VNC and in what I'm sure was just a coincidence, many of us never received the required notice when they scheduled their initial CPC hearing last December.

Thankfully I was notified by a neighbor a week before Thanksgiving, that there was a hearing scheduled for December 10. We requested CPC to delay the hearing, but that request was denied. Without much time to prepare, we were heard at LUPC on Thursday 12/4 and then convinced the full VNC to hold a special meeting on Tuesday 12/9 to hear the project. Dozens of neighbors submitted public comments and not one was in support of the project. Not one. The project was unanimously rejected by both LUPC and the full VNC. Then at the initial CPC hearing the pattern was the same; all public comment was opposed and not a single person called in support. Not one.

The bottom line: This developer wants to drop a 52-foot commercial tower in a historic neighborhood with a 30-foot height limit, cram 20 units and two restaurants onto a quiet residential block, and dump all its residential and commercial access, trash trucks, deliveries, and rideshare traffic into a tiny 14-foot alley that our kids use every single day.

They claim that there will not be any impact on the traffic or parking in the adjacent streets. That is absurd. We are two blocks from the Venice boardwalk and exactly halfway between the commercial districts along Windward/Pacific and Abbot Kinney. Parking is already incredibly scarce, and this will only make it worse.

They're violating the Venice Specific Plan, the Coastal Act, the Mello Act, AND common sense. LUPC got it right. The VNC got it right. Unanimously. This project is unsafe, out of scale, and flat-out disrespectful to this community. Please uphold the denial.

To: Sienna Kuo sienna.kuo@lacity.org; Juliet Oh Juliet.Oh@lacity.org; Vince Bertoni vince.bertoni@lacity.org; Ira Brown Ira.Brown@lacity.org; CPC@lacity.org

CC: smallstreetsbighearts@gmail.com

Subject: DENY CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF at 1410-1410-1422 Main Street, Venice

Ms. Kuo,

I was distressed to read your staff report recommending approval of this project as it is riddled with errors and you did not include important content such as the unanimous findings of denial by the Venice Neighborhood Council and their Land Use and Planning Committee.

A few details that I noticed that you have incorrect on your document:

1. Throughout your document, you claim that Main Street is east of the property and the alley is west of the property when the opposite is true. This makes me think you have not actually visited the site.
2. Similarly, you claim that the property sits along an "unnamed.alley.which.is.7❷'. wide." The alley in question has a street sign labeled Toledo Court and is only 14' wide. This seems to confirm that you have not actually visited the site.
3. You claim that Main Street has a center median and it does not.
4. You mention that you took into consideration "input.from.the.public" in your approval but there is no record of any public approval. Every single comment from the public at the local hearings and the previous City hearing on December 10 opposed the project. Every single email you received and posted opposes the project. The VNC and LUPC unanimously voted to oppose the project.
5. You claim that "the.incentives.will.not.have.a.Specific.Adverse.Impact.upon.public. health.and.safety.or.on.any.real.property.that.is.listed.in.the.California.Register.of. Historical.Resources", however the property is abutted by multiple buildings built in the 1920's that will be adversely affected by the excavation of the land for the underground parking level. The sinkhole that destroyed the property at 1015 Marco Place during the construction of the project at 1812 Lincoln is illustrious of what is likely to occur even closer to the ocean at this property. In fact, there is precedent of a sinkhole occurring at 210 Market Street several years ago concurrent with the removal of a tree.
6. The project is located within a Methane Zone, Liquefaction area, Flood Zone AE, Tsunami Hazard Area, and within 5 kilometers of the Santa Monica Fault yet on page F-4 you state that: "The.project.is.not.located.on.a.substandard.street.in.a.Hillside.

area.and.is.not.located.in.a.Flood.Zone?Very.High.Fire.Hazard.Severity.Zone?or.any.other.special.hazard.area¡.Therefore?there.is.no.substantial.evidence.that.the.proposed.project.and.requested.waivers.would.have.a.specific.adverse.impact.on.public.health.and.safety."

7. Similarly, you claim that "The.proposed.project.will.be.built.atop.existing.grade.resulting.in.minimal.disturbance.to.the.existing.geology.and.soils.of.the.project.site" yet they plan to dig an underground parking structure in a Flood Zone and Liquefaction Zone.
8. You accept their claims that "primary.regional.access.is.provided.by.the.Marina.Freeway?Venice.Boulevard?and.Lincoln.Boulevard?which.are.all.accessible.within.7¡❶miles.of.the.Project.Site¡ ..You should know that the Marina Freeway is NOT within 1.5 miles of the Project Site.
9. You accept that "based.on.the.survey.provided.by.the.applicant.team?the.average.height.of.the.immediate.area.is.approximately.87¡❺feet.and.the.average.building.height.if.7¡❹stories¡.While.the.proposed.project.will.exceed.these.averages.with.a.❶_story.structure?approximately.❶8.feet?76.inches?the.average.does.not.reflect.the.full.range.of.existing.structures¡.Structures.nearby.such.as.7976_7986.Innes.Place.and.7❶67.Main.Street.are.three.stories.with.an.approximate.height.of.96.feet¡.Without.the.proposed.solar.trellis?the.structure.would.be.considered.0❷feet?0.inches.tall¡.As.such?the.proposed.project.is.compatible.in.scale.and.character.with.the.existing.neighborhood?and.the.Venice.Coastal.Development.Project.would.not.be.materially.detrimental.to.adjoining.lots.or.the.immediate.neighborhood¡ .This is not correct, and I find it disingenuous that the applicant includes the rooftop deck when it fits their needs and excludes it when it does not.
10. You claim that "the.project.will.be.located.in.an.existing.developed.area.contiguous.with.similar.residential.uses.and.will.not.have.a.significant.adverse.impact.on.coastal.resources.and.that.the.project.height?massing.and.scale.of.the.project.is.consistent.with.existing.buildings.along.Main.Street¡ Neither of those are true statements.
11. You claim that »The.proposed.development.will.not.adversely.impact.the.scale.or.character.of.the.street.as.it.is.situated.on.a.busy.corridor.developed.with.multi_family.residential.and.commercial.structures.that.are.comparable.in.height.and.massing¡.As.such?the.proposed.development.is.visually.compatible.with.the.character.of.the.surrounding.area¡ Neither of those are true statements.
12. You claim that »Given.the.demonstrated.off_site.capacity.and.the.site's.strong.multimodal.infrastructure?the.proposed.parking.reduction.will.not.create.adverse.coastal.access.or.neighborhood.parking.impacts¡ ..This is not true. Although there are some off-street paid parking options in the area, these are competing with

thousands of daily beach visitors and dozens of other restaurants in the immediate area who do not provide parking for their patrons. I challenge their assessment that this project will not cause an undue limitation of existing street parking.

13. You give the applicant historical precedence by accepting their claim that "numerous.Ø_.and.❶_story.Pre_Coastal.Act.buildings.exist.in.Venice?including.Hotel. Erwin?Venice.Breeze.Suites?and.the.Waldorf.Building¡.These.buildings.establish.a. precedent.for.midrise.construction.in.the.coastal.context¡ You do not take into consideration that each of these buildings were built before the Coastal Act went into effect in 1976 and thus cannot be used as similar precedent.
14. You accept the applicant's claim that they will include a "local hire" provision. The farthest address from the Project site within the area identified as Venice, CA is 1.45 miles away. Most studies use a 5–7-mile radius. You accept their claim that »it.is. realistic.to.presume.that.a.plurality.of.the.restaurant's.employees.can.be.sourced. from.the.region's.local.workforce.supply¡.Based.upon.the.demography.and. demonstrated.commuting.behavior.in.the.area?the.Project.expects.the.local.higher. policy.to.result.in.a.significantly.reduced.demand.in.employee.parking¡ As the median rent in the Venice 90291 zip-code is currently $4000 per month; I challenge the assumption that the restaurants will be paying their staff enough to allow them to live locally. It is simply not true.

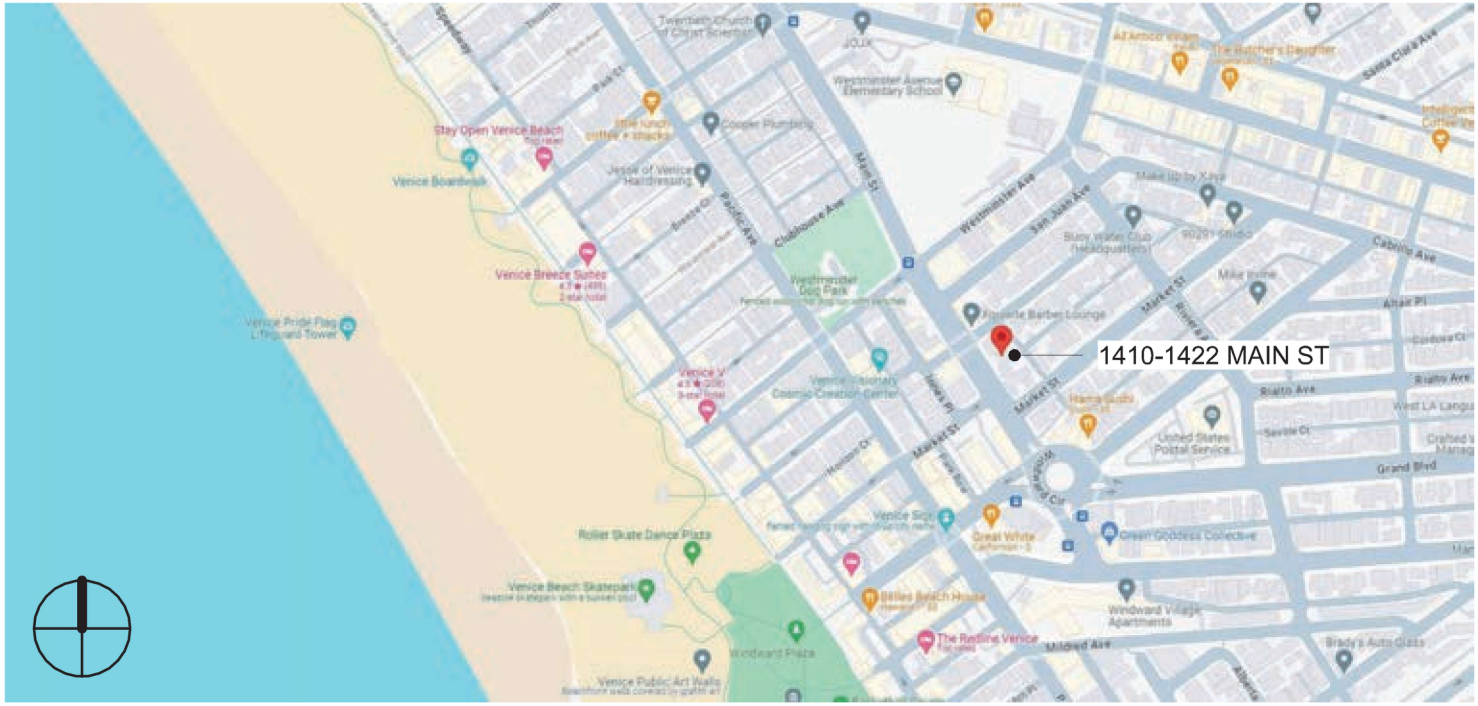
One claim that you make that is true is that (on page F-15) »The.requested.88.feet?76. inches.above.the.permitted.flat.roof.height.will.be.materially.detrimental.to.the.adjoining. lots.or.the.immediate.neighborhood¡ ..Yet you seem to ignore this finding in your approval.

Given these inconsistencies and outright falsehoods in your document, I urge you to reconsider your determination.

Best regards,

Rick Garvey 234 Horizon Avenue #5, Venice, CA 90291

VICINITY MAP



ARCHITECTURAL SYMBOLS LEGEND

(E)	**Existing**	VIF	**Verify In Field**
TYP	**Typical**		**North Arrow**
℄	**Center Line**	Room name / 101	**Room Tag**
Ⓣ	**Tempered**		**Level Head**
	Align	Sm/Cm	**Smoke/Carbon Monoxide Detector**
1t	**Door Mark**		**Exhaust Fan, TYP.**

ADDRESS:

ZONING:

APN #:

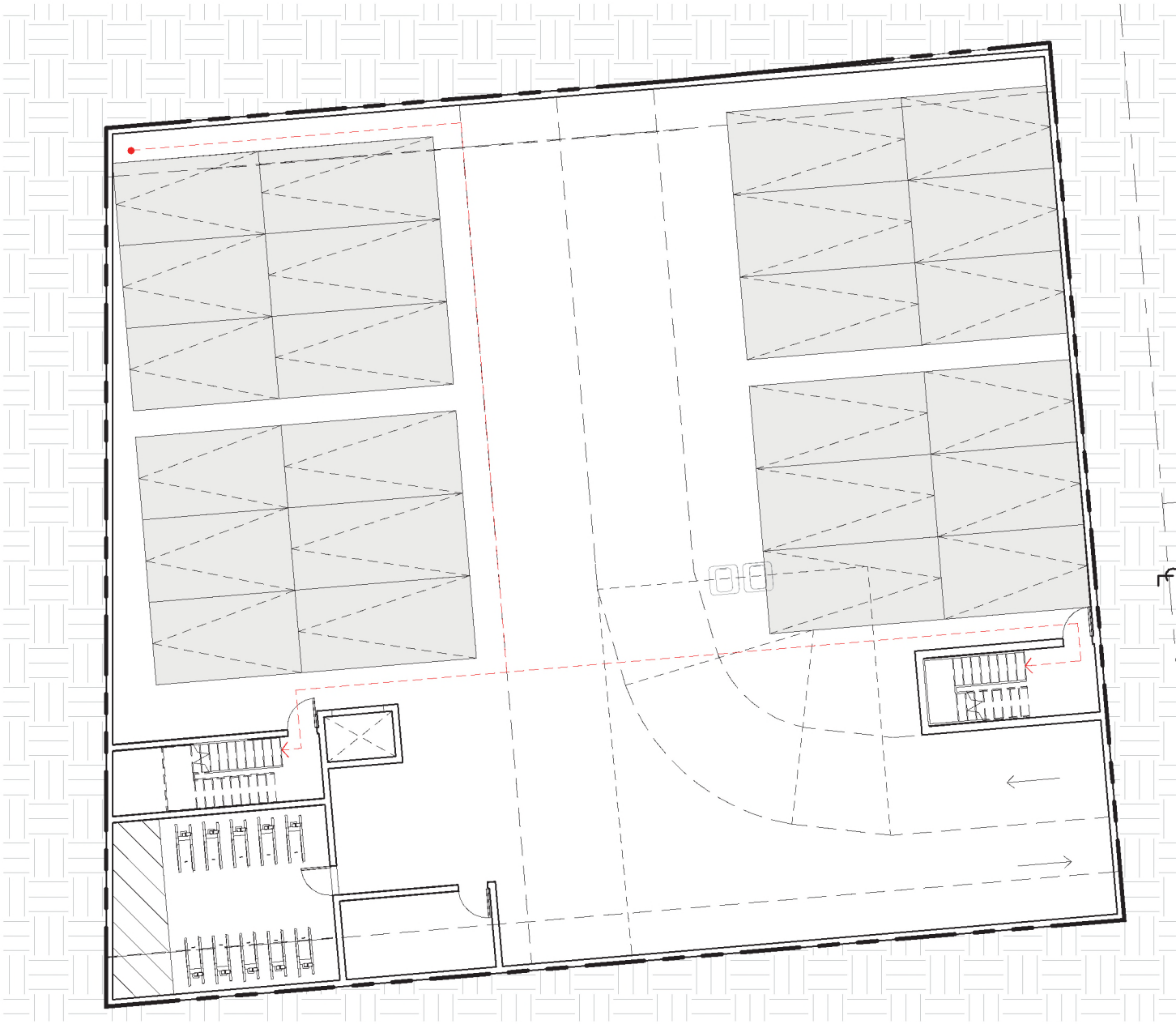
LEGAL DESCRIPT

MAP REFERENCE

LOT AREA:

EXISTING BUILDIN
USE:

BUILDING SETBAC



1 LV B1 PARKING - AREA PLAN
1/16" = 1'-0"

LAMC 12.21 G.2.(a)(3)
A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway. For a surface area not located directly on finished grade that is used for common open space, and located at ground level or the first habitable room level, shrubs and/or trees shall be contained within permanent planters at least 30-inches in depth, and lawn or ground cover shall be at least 12-inches in depth. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained.

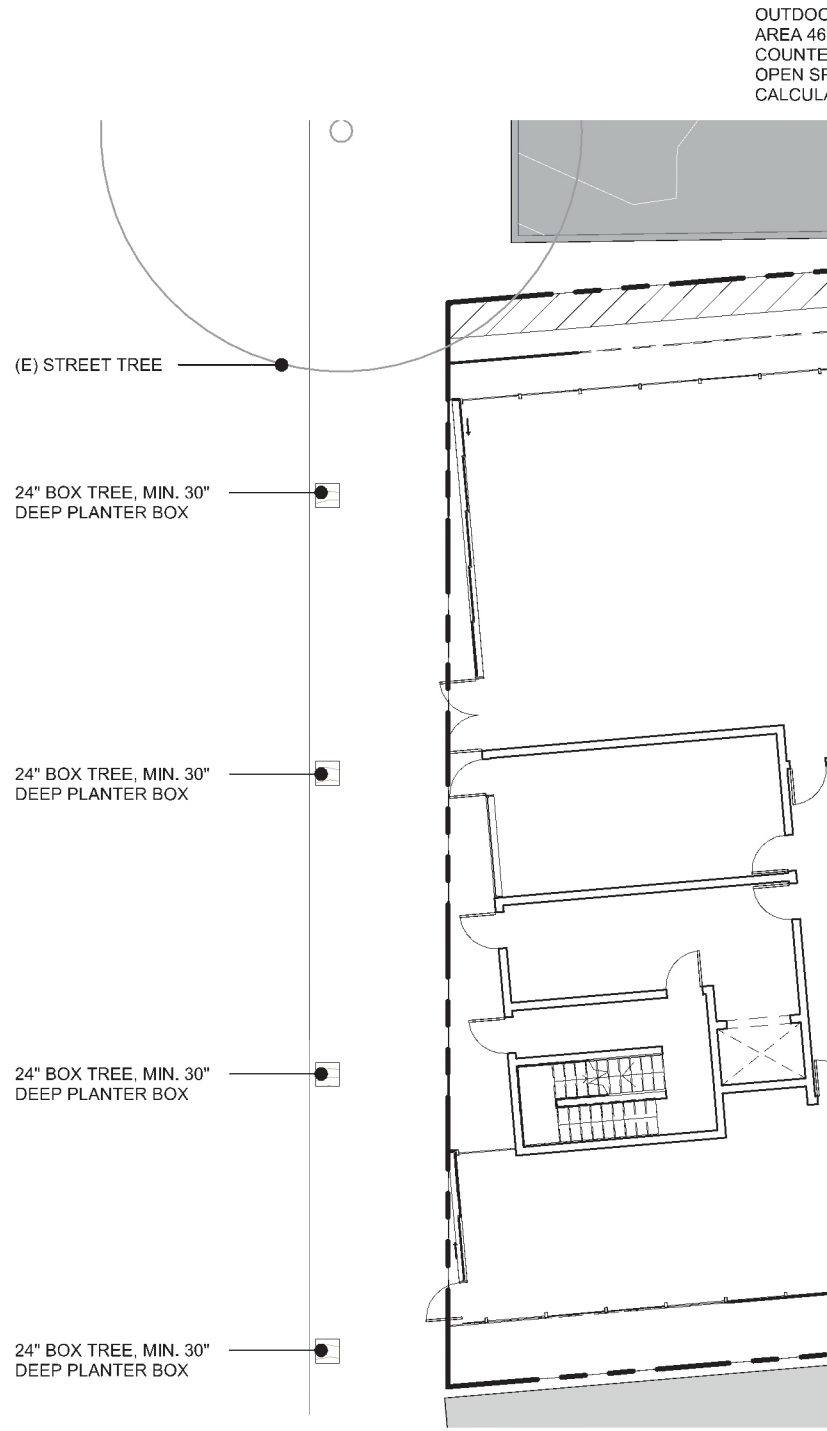
REQUIRED OPEN SPACE:
5XSTUDIO = 1 HABIT. ROOM = 5X100 = 500 SF
5X1 BR = 2 HABIT. ROOMS = 5X100 = 500 SF
10X2 BR = 3 HABIT. ROOMS = 10X125 SF = 1,250 SF

TOTAL REQUIRED OPEN SPACE = **2,250 SF**

PROVIDED OPEN SPACE:
2,883 SF COMMON OPEN SPACE ON ROOF DECK
(1,106 SF LANDSCAPED)

TOTAL PROVIDED OPEN SPACE = **2,883 SF**
% LANDSCAPED OPEN SPACE =
1,106 / 2,883 = **38.3%**

PROPOSED TREES:
1 STREET TREE + 4 24-INCH BOX TREES ON SITE =
5 TREES PROPOSED (REQUIRED = 5)



City of Los Angeles
Department of City Planning

11/10/2024
PARCEL PROFILE REPORT

PROPERTY ADDRESSES

1410 S MAIN ST

ZIP CODES

90291

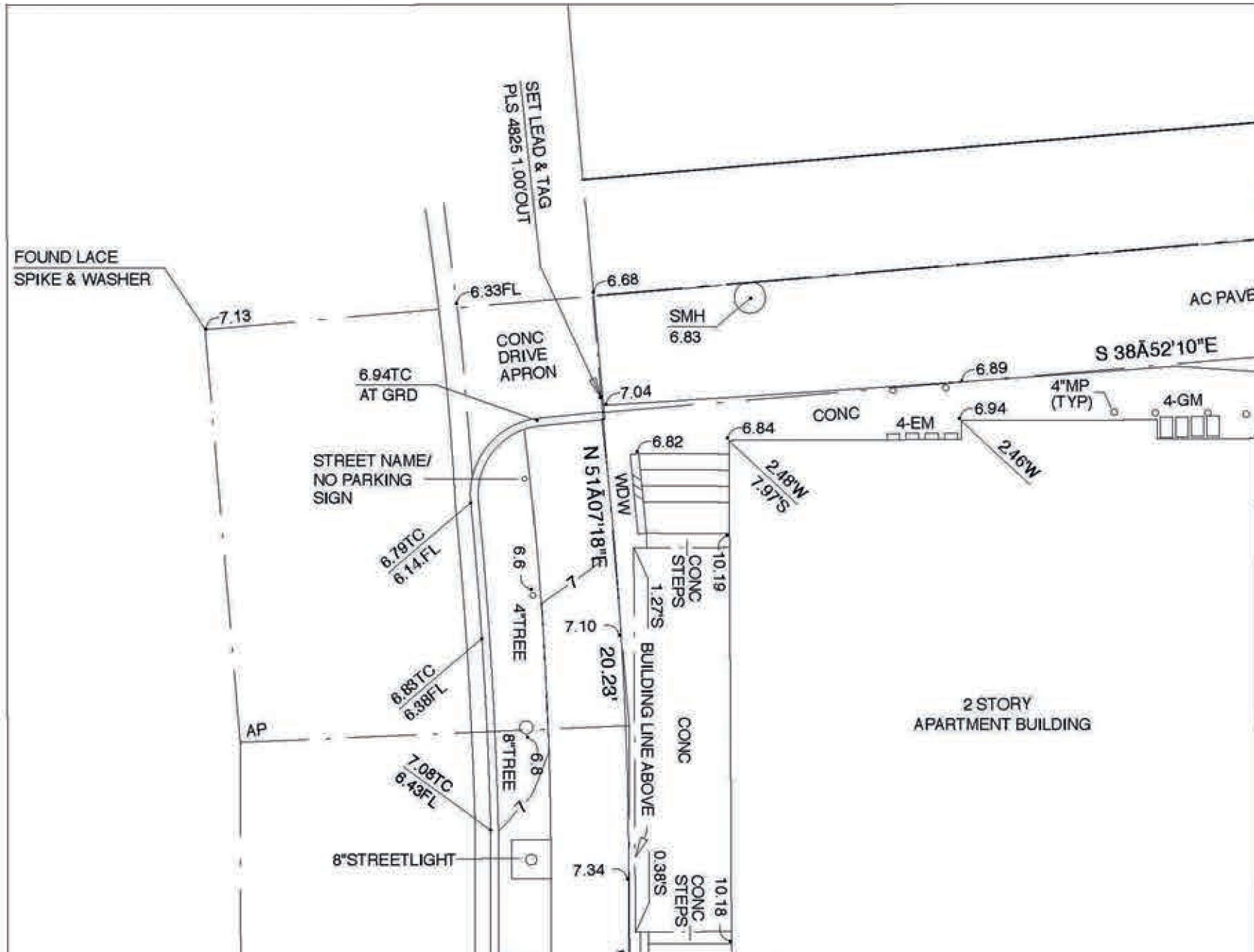
RECENT ACTIVITY

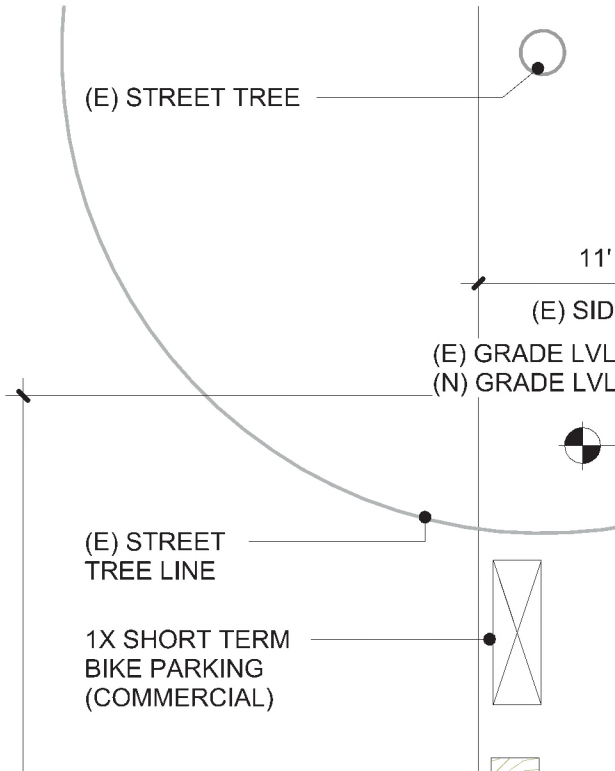
None

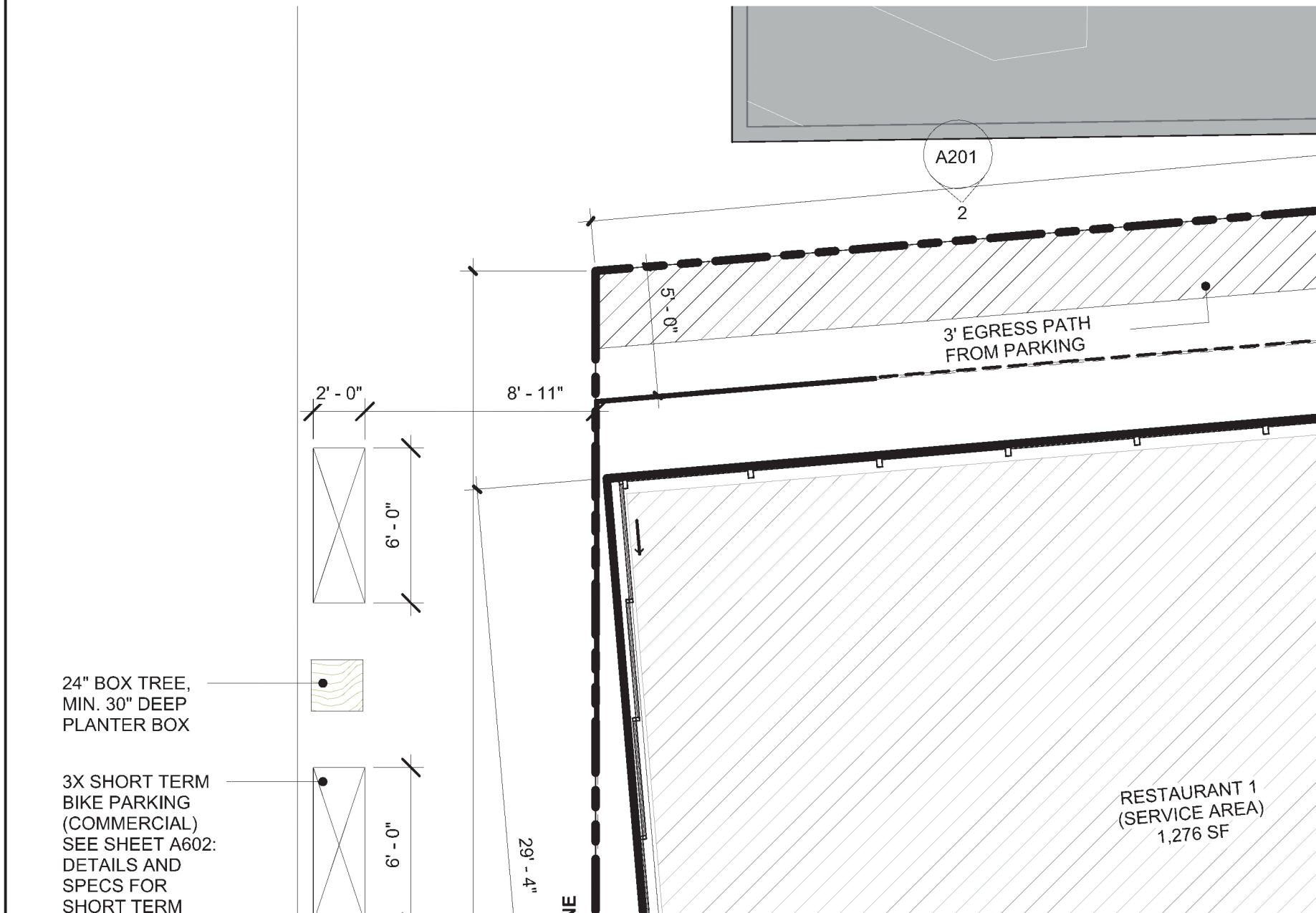
CASE NUMBERS

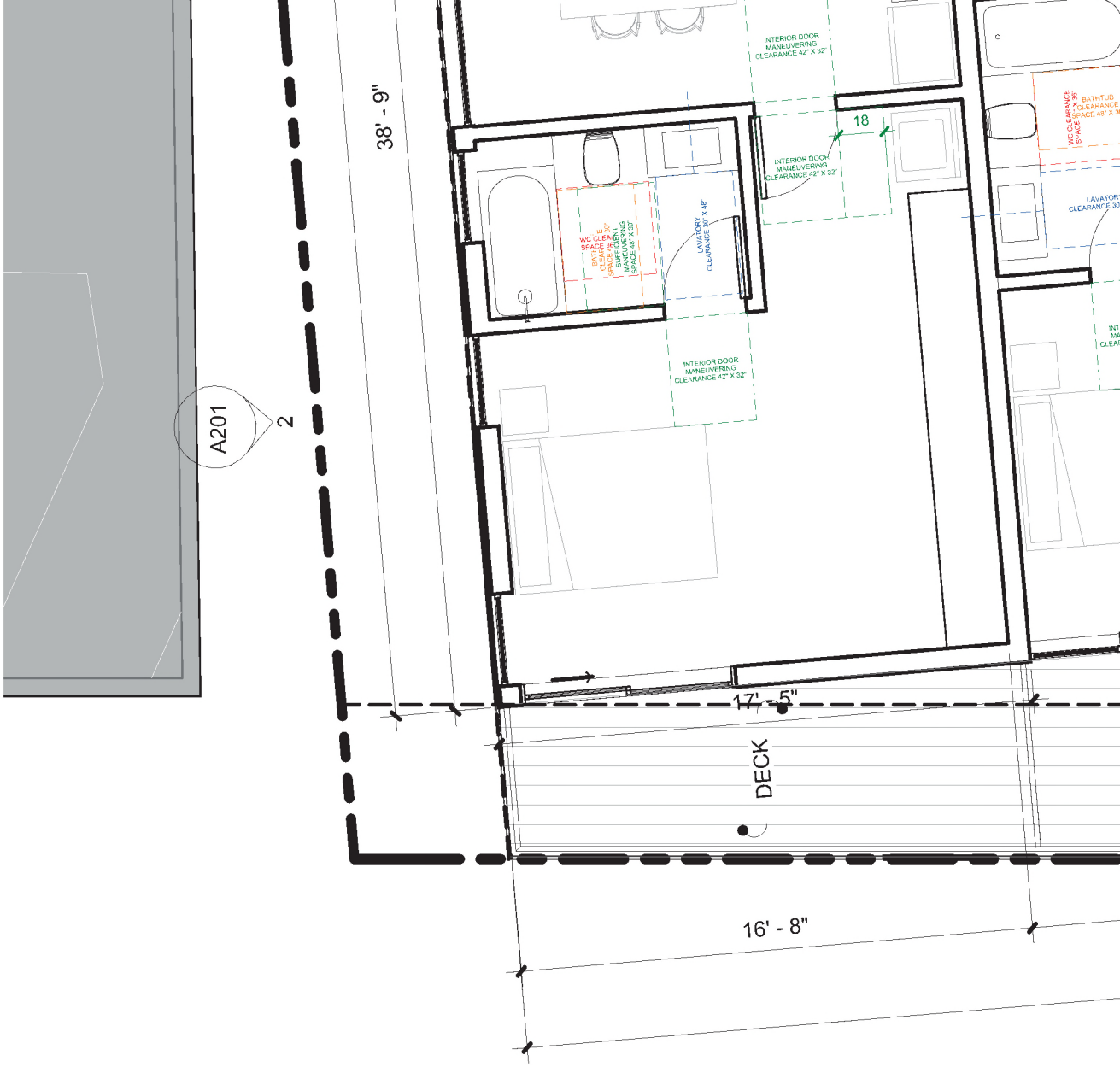
APCW-2021-2020-CDP-MEL-SPE-SPP-WDI
CPC-2019-7393-CA
CPC-2018-7548-CPU
CPC-2014-1456-SP
CPC-2013-2377-DB-CDP-SPP-MEL
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1987-648-ICO
CPC-1984-226
CPC-17630
ORD-186104
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-168999
ORD-130336
DIR-2014-2824-DI
DIR-2008-4703-DI
DIR-2008-3681-DI
ENV-2021-2021-EAF

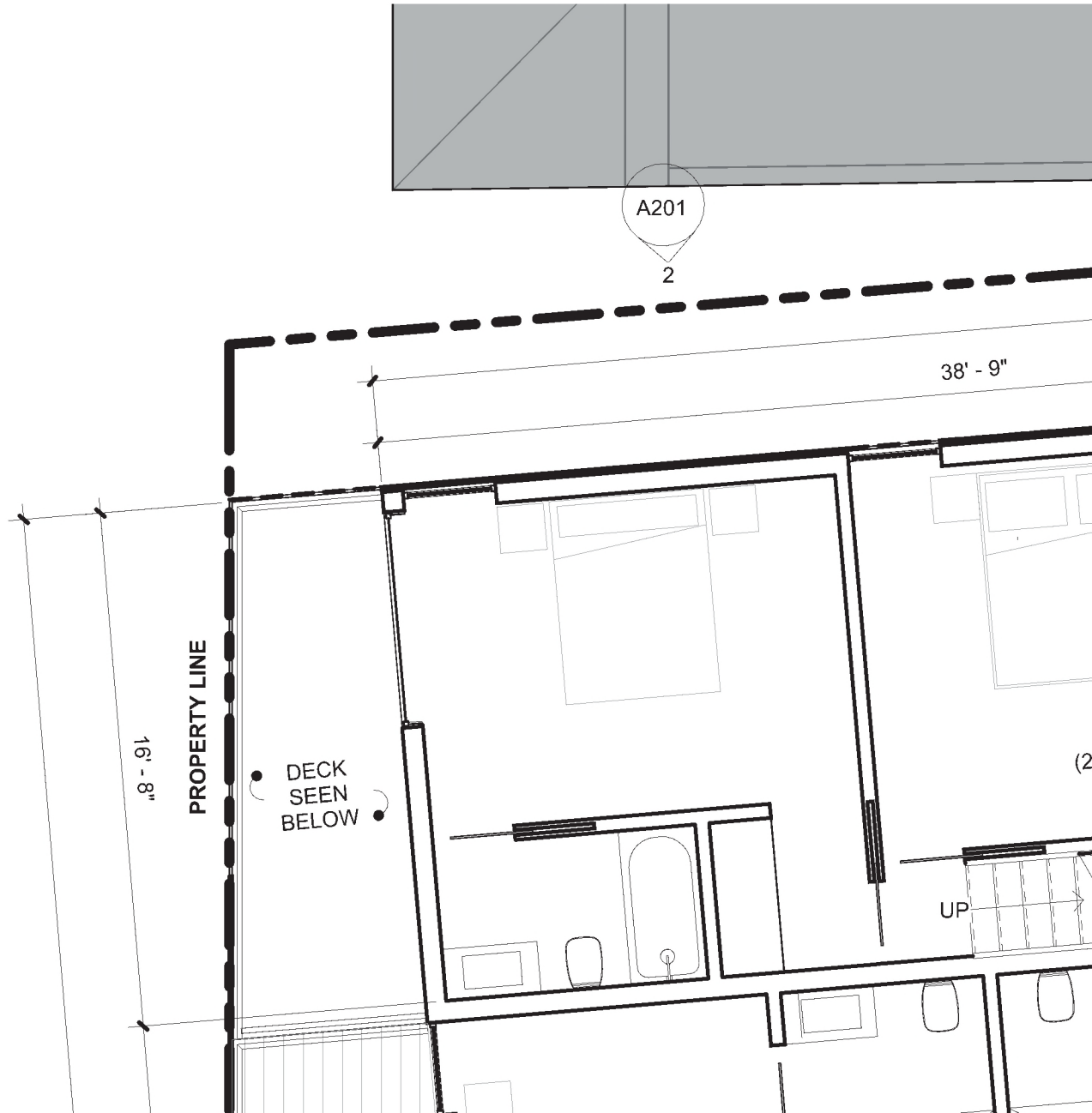
Address/Legal Information	
PIN Number	108B145 1701
Lot/Parcel Area (Calculated)	2,954.6 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238012003
Tract	VENICE OF AMERICA
Map Reference	M B 6-126/127
Block	7
Lot	3
Arb (Lot Cut Reference)	None
Map Sheet	108A143
	108B145
Jurisdictional Information	
Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Traci Park
Census Tract #	2735.02
LADBS District Office	West Los Angeles
Permitting and Zoning Compliance Information	
Administrative Review	None
Planning and Zoning Information	
Special Notes	None
Zoning	C2-1-O
Zoning Information (ZI)	ZI-1874 Specific Plan: Los Angeles Coastal Transportation Corridor
	ZI-2273 Specific Plan: Venice Coastal Zone
	ZI-2453 SurveyLA - Lost Venice Canals Historic District
	ZI-2517 Al Fresco Ordinance within Planning Overlay and/or the Coastal Zone (Ordinance 188073)
	ZI-2406 Director's Interpretation of Venice Specific Plan and Small Lot Subdivision Ordinance
	ZI-2498 Local Emergency Temporary Regulations - Time Limits and Parking Relief - LAMC 16.02.1
	ZI-2452 Transit Priority Area in the City of Los Angeles

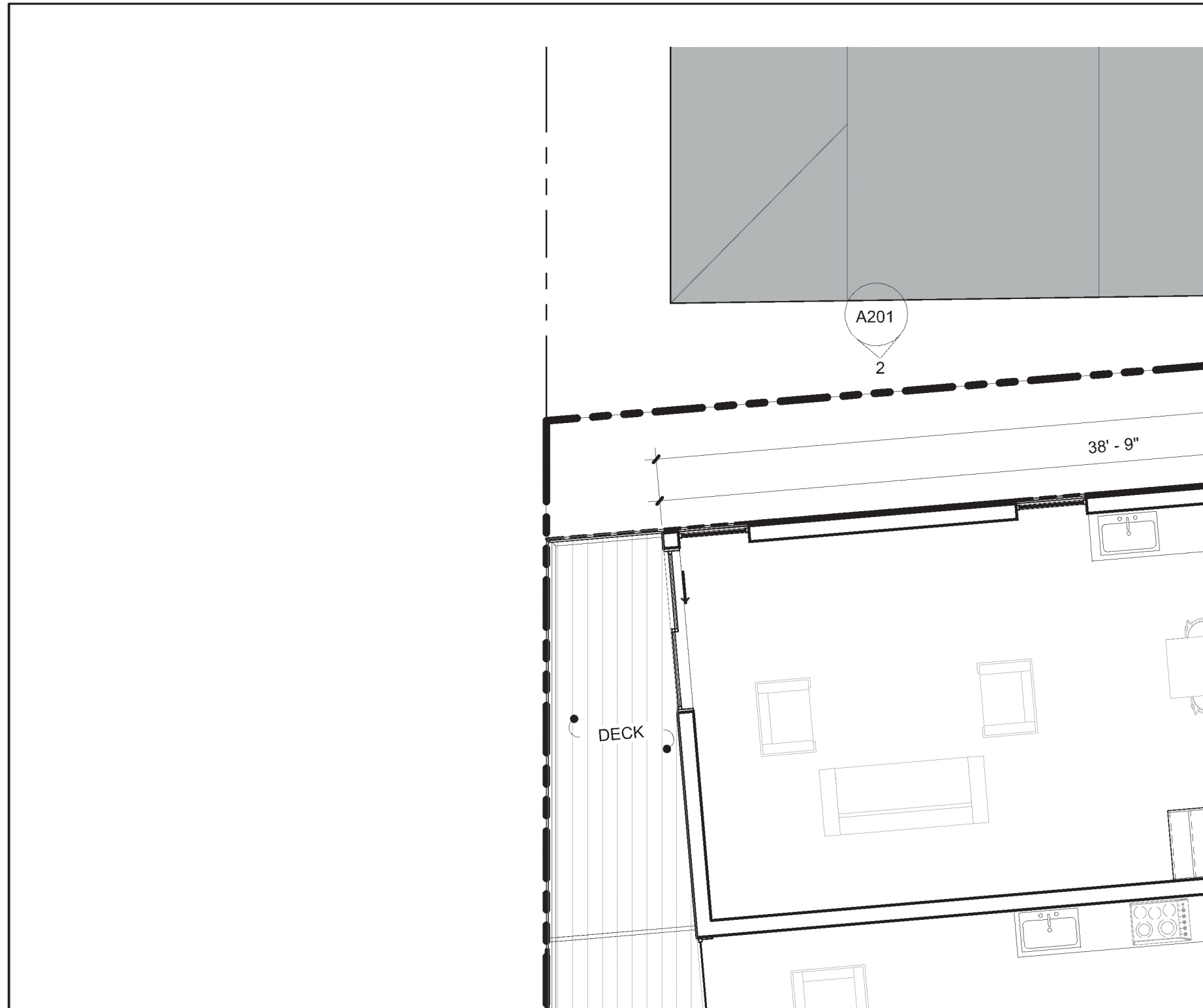

SET LEAD & TAG
PLS 4825 1.00'OUT
FOUND LACE
SPIKE & WASHER
7.13
6.33FL
6.68
SMH
6.83
AC PAVE
CONC
DRIVE
APRON
S 38Ã52'10"E
6.89
6.94TC
AT GRD
7.04
4"MP
(TYP)
4-GM
CONC
4-EM
6.94
6.84
6.82
2.46'W
2.48'W
7.91'S
STREET NAME/
NO PARKING
SIGN
N 51Ã07'18"E
WDW
6.79TC
6.14FL
6.6
4"TREE
10.19
CONC
STEPS
1.27'S
7.10
20.23'
BUILDING LINE ABOVE
CONC
2 STORY
APARTMENT BUILDING
6.88TC
6.38FL
AP
8"TREE
6.8
7.08TC
6.43FL
8"STREETLIGHT
7.34
0.38'S
10.18
CONC
STEPS


(E) STREET TREE
11'
(E) SID
(E) GRADE LVL
(N) GRADE LVL
(E) STREET
TREE LINE
1X SHORT TERM
BIKE PARKING
(COMMERCIAL)


A201
2
5' - 0"
3' EGRESS PATH
FROM PARKING
2' - 0"
8' - 11"
6' - 0"
24" BOX TREE,
MIN. 30" DEEP
PLANTER BOX
3X SHORT TERM
BIKE PARKING
(COMMERCIAL)
SEE SHEET A602:
DETAILS AND
SPECS FOR
SHORT TERM
6' - 0"
29' - 4"
RESTAURANT 1
(SERVICE AREA)
1,276 SF

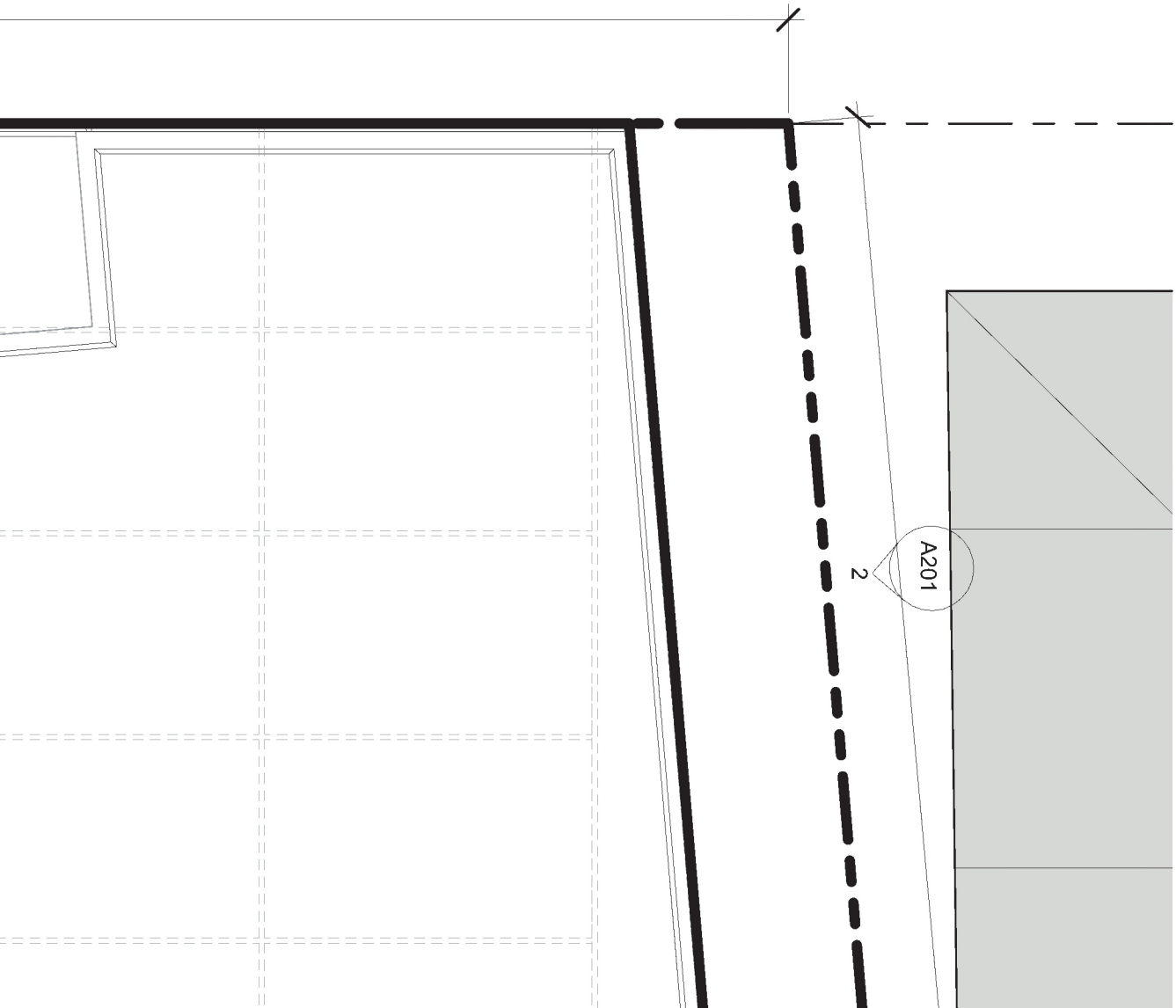

38' - 9"
A201
2
INTERIOR DOOR MANEUVERING CLEARANCE 42" X 32"
18
INTERIOR DOOR MANEUVERING CLEARANCE 42" X 32"
LAVATORY CLEARANCE 30" X 48"
INTERIOR DOOR MANEUVERING CLEARANCE 42" X 32"
17' - 5"
DECK
16' - 8"

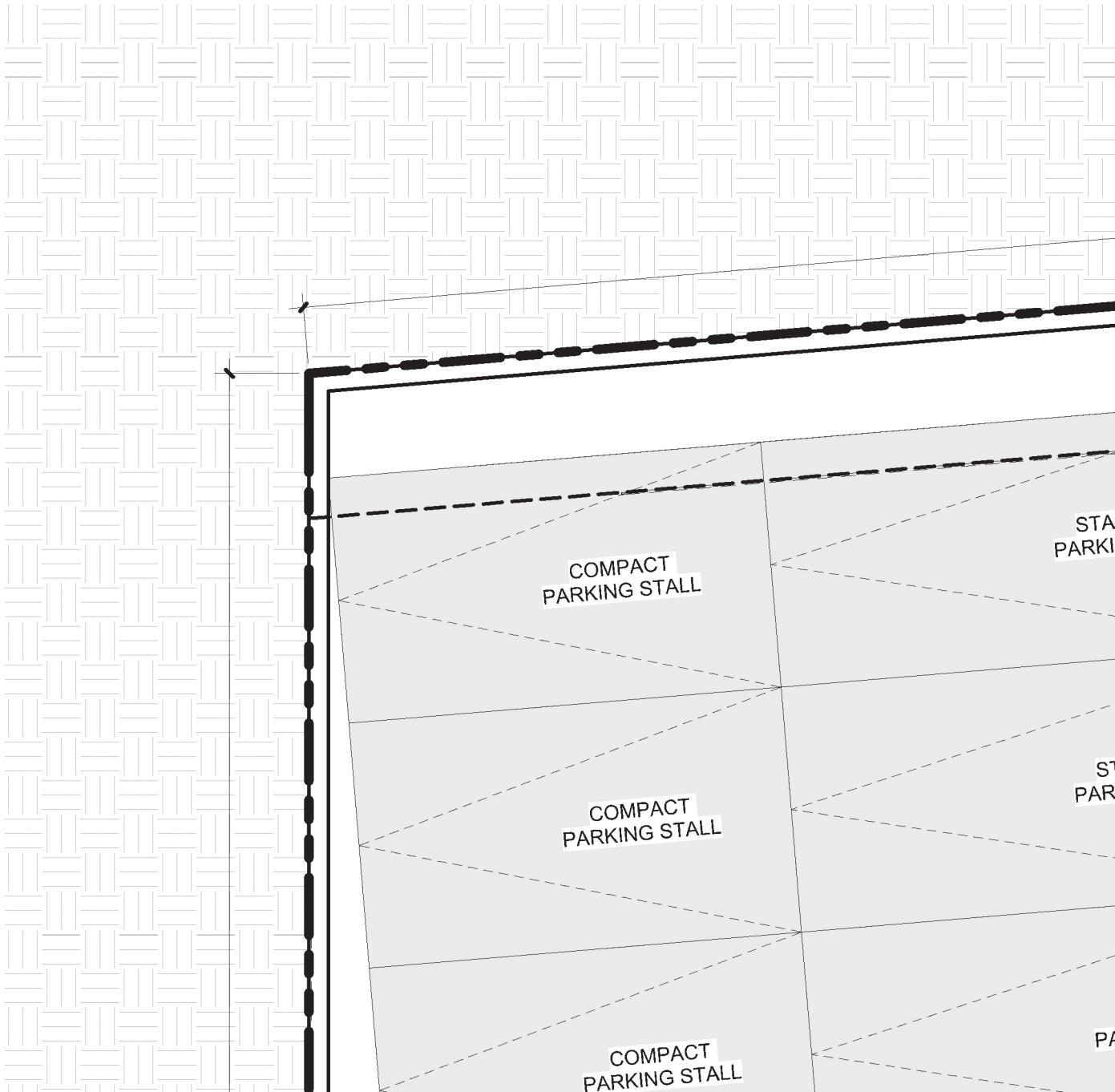

A201
2
38' - 9"
16' - 8"
PROPERTY LINE
DECK
SEEN
BELOW
UP

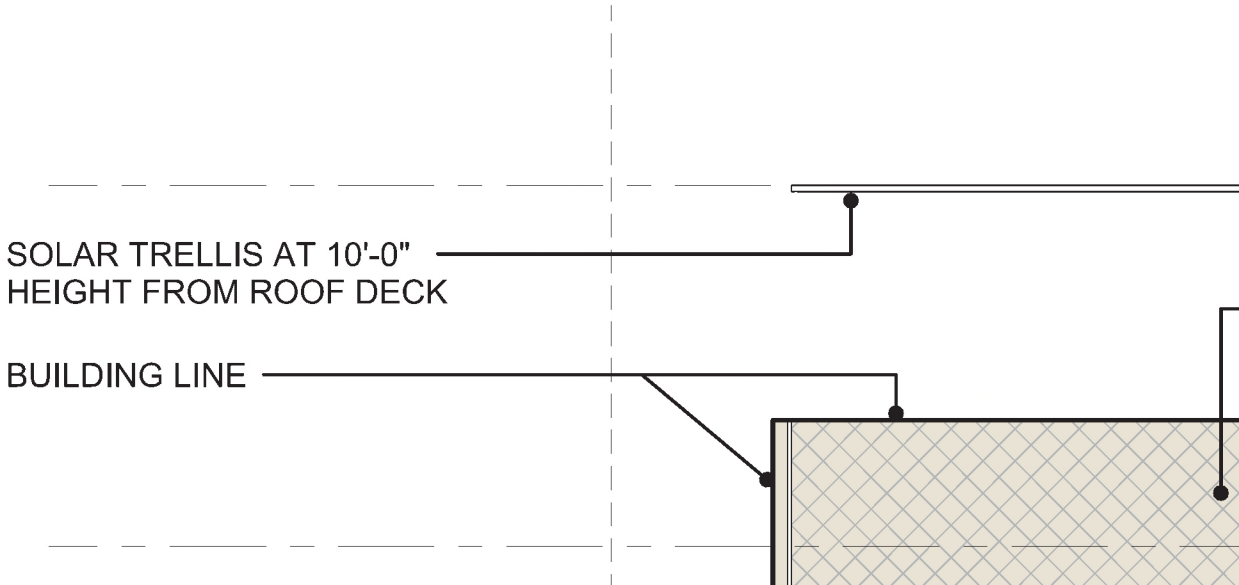

A201
2
38' - 9"
DECK

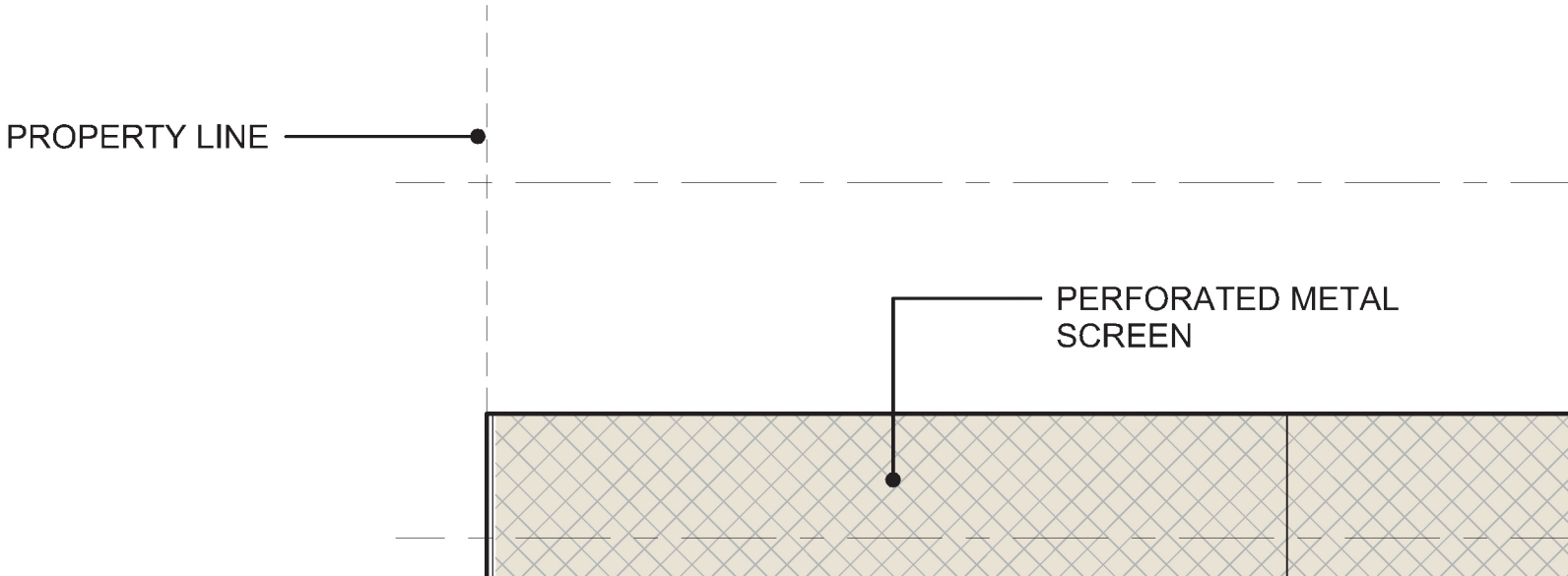
MAIN ST

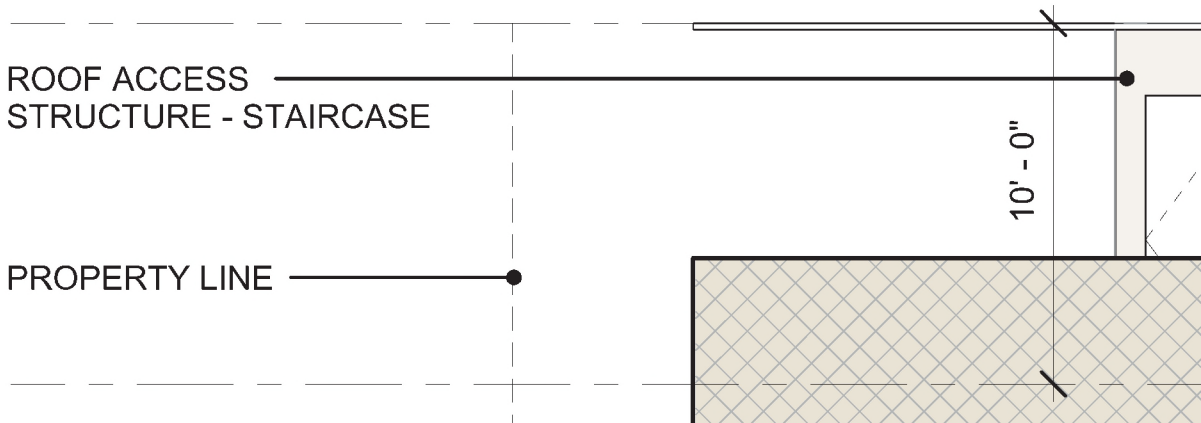
SIDEWALK

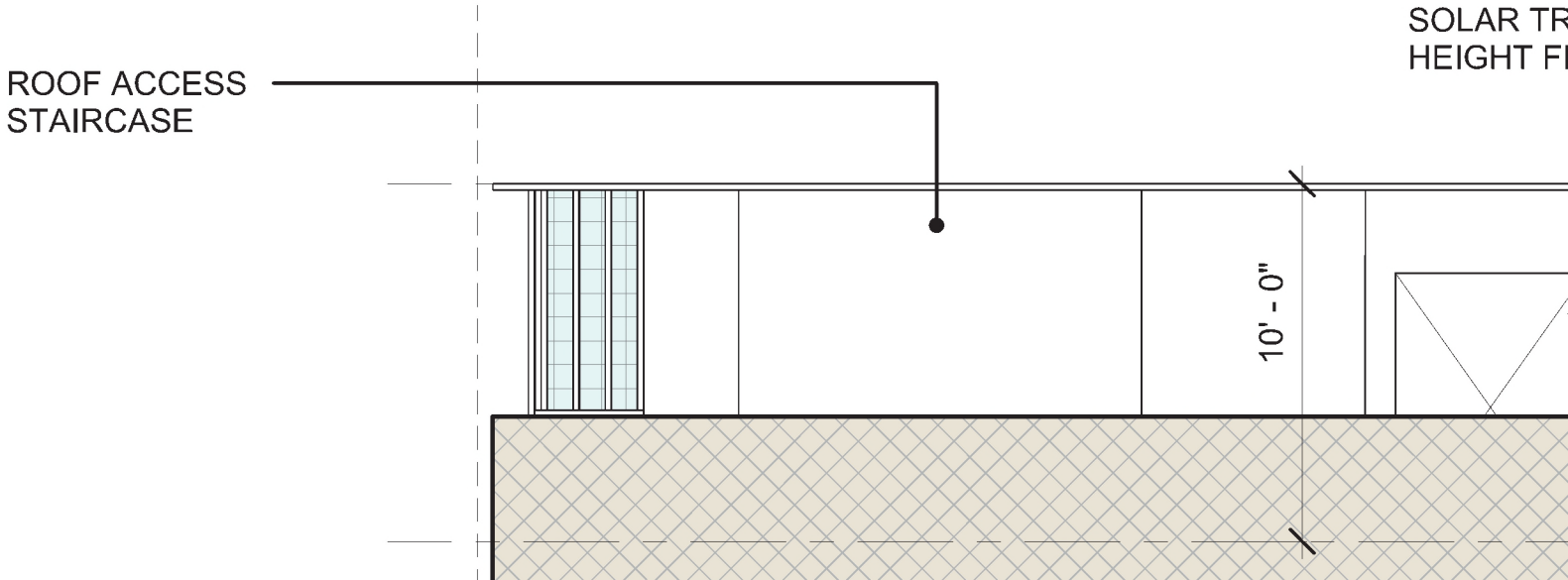


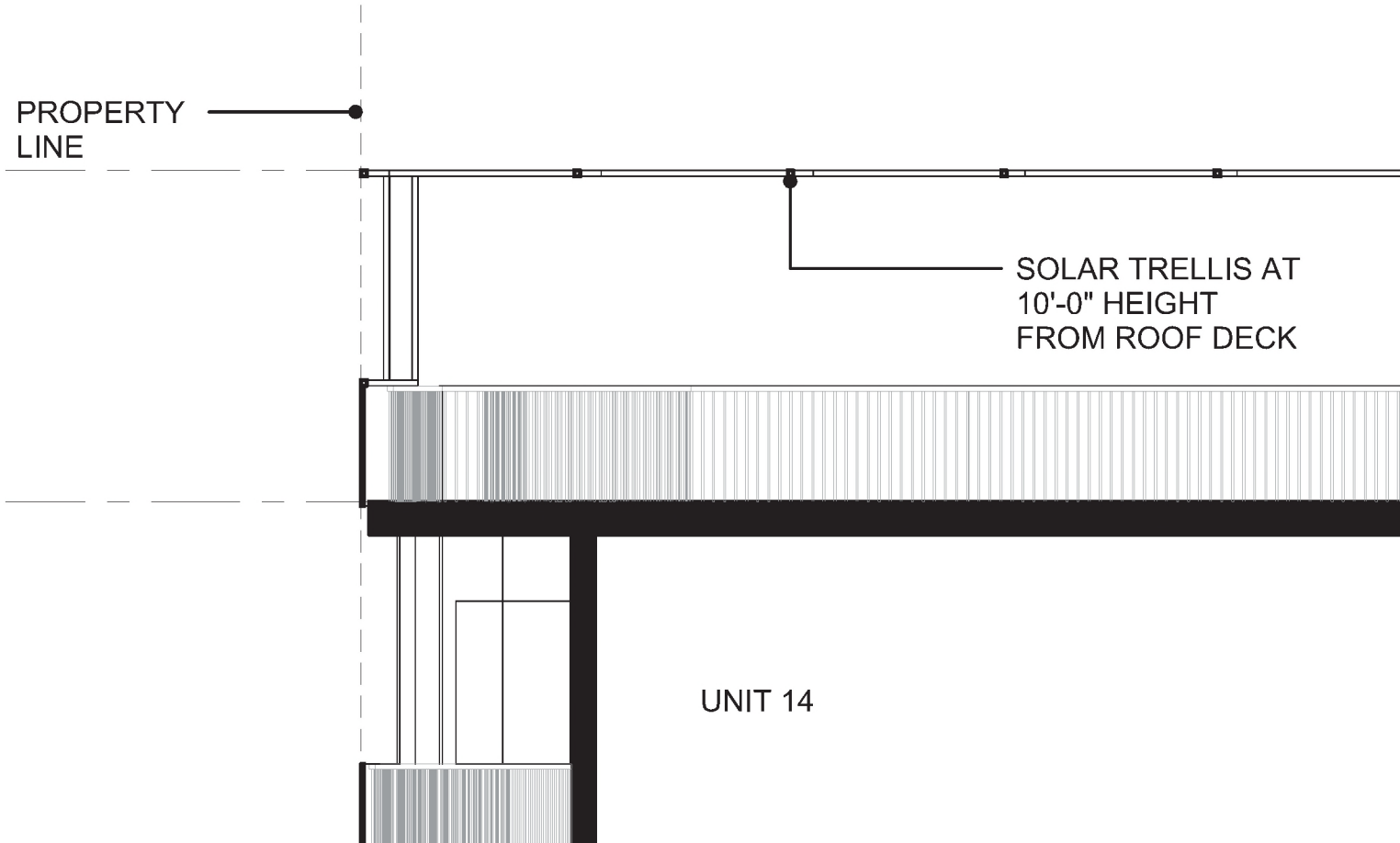

COMPACT
PARKING STALL
COMPACT
PARKING STALL
COMPACT
PARKING STALL

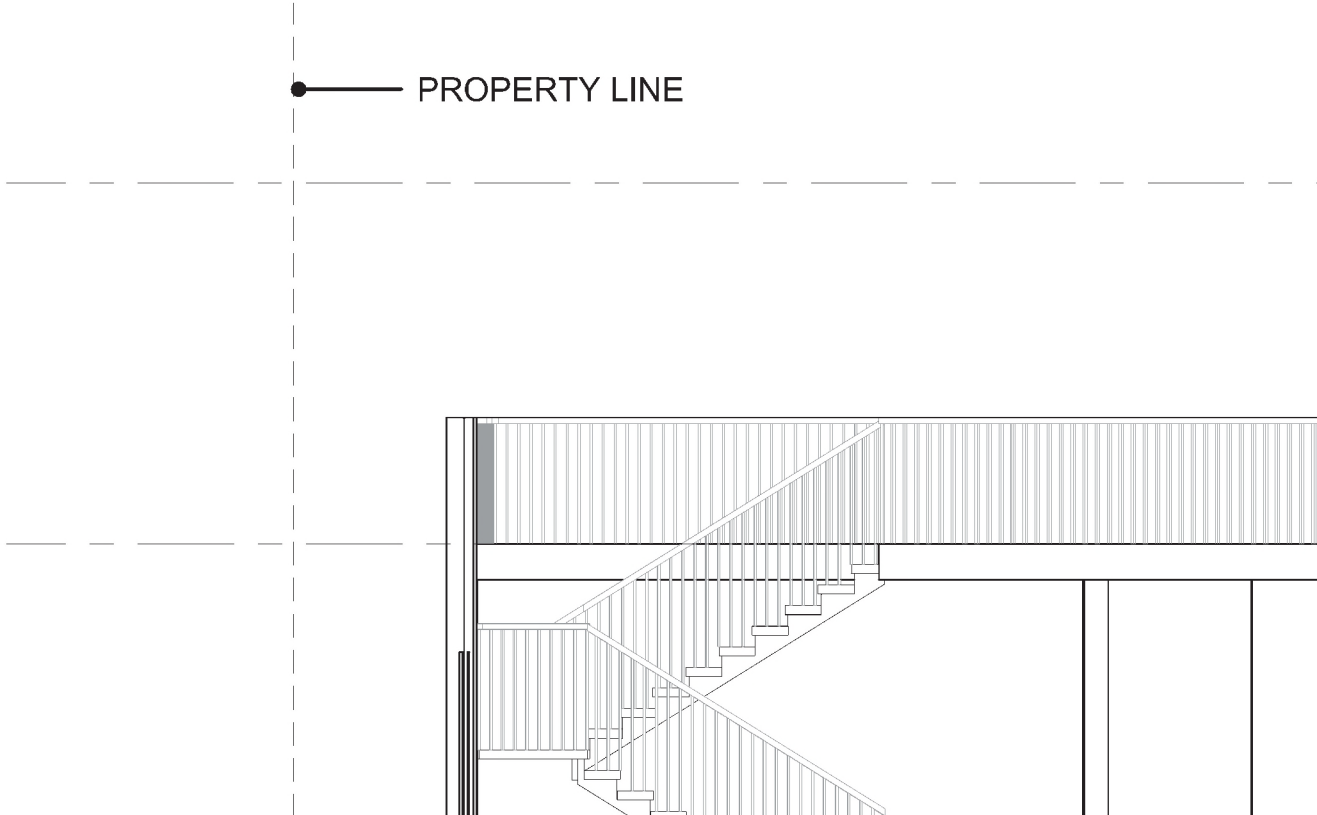

SOLAR TRELLIS AT 10'-0"
HEIGHT FROM ROOF DECK
BUILDING LINE

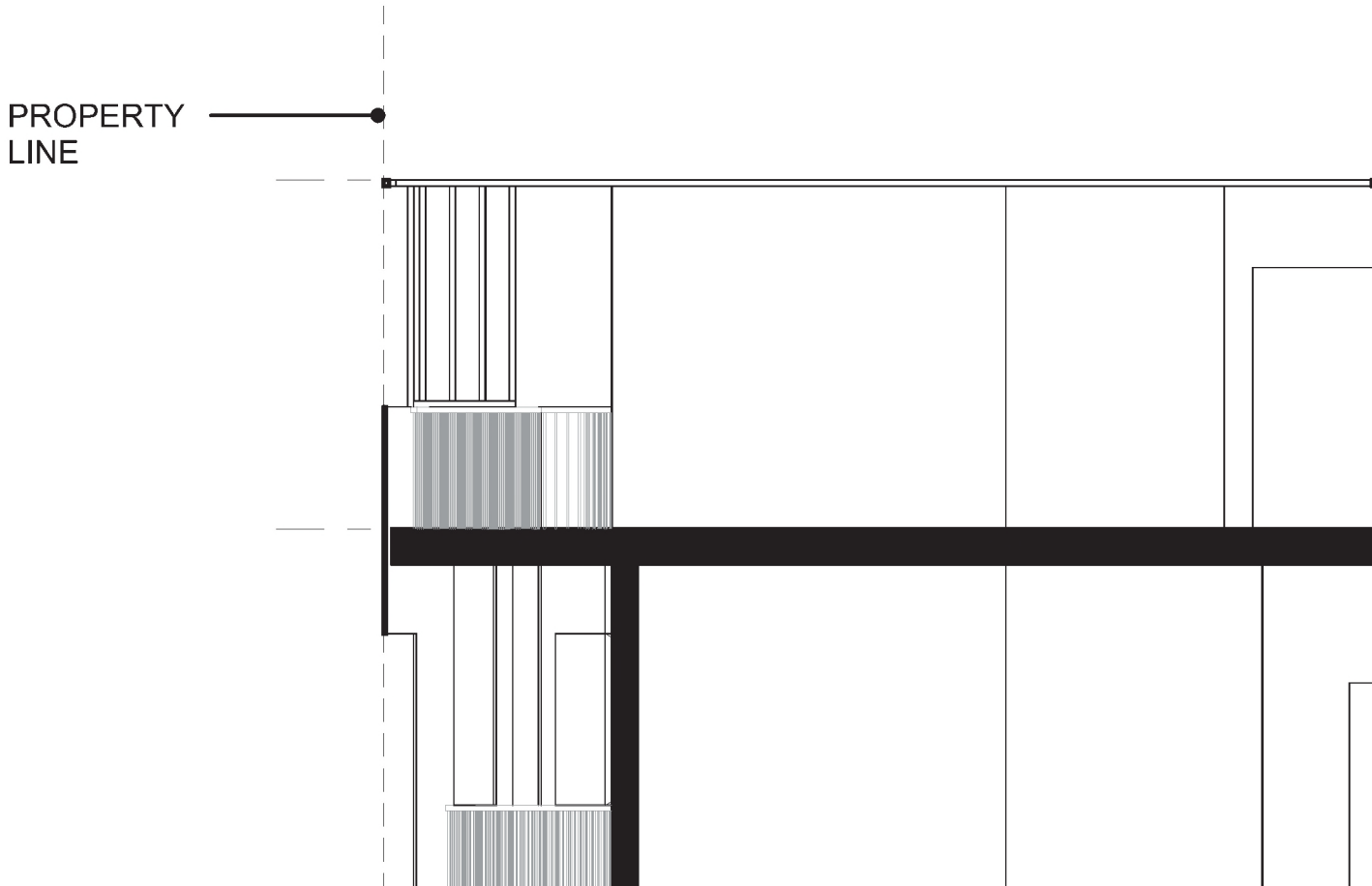

PROPERTY LINE
PERFORATED METAL
SCREEN

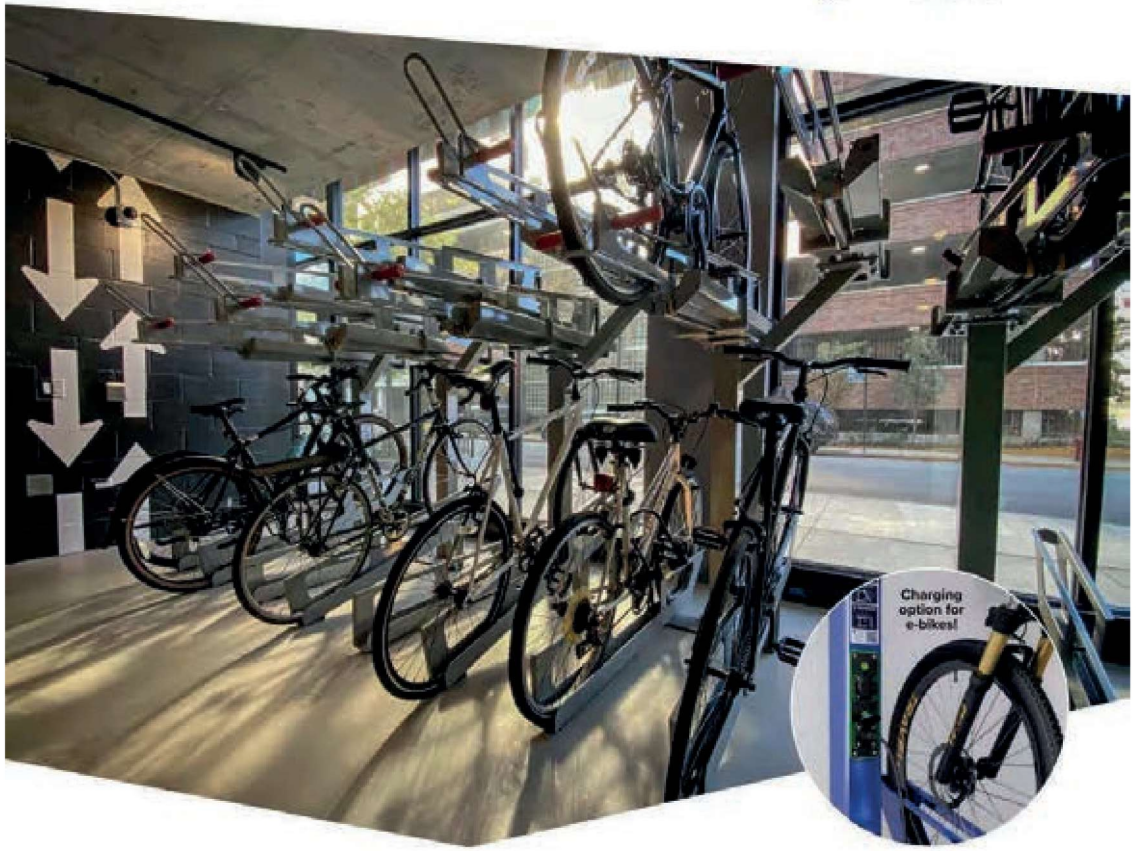

ROOF ACCESS
STRUCTURE - STAIRCASE
PROPERTY LINE
10' - 0"


ROOF ACCESS
STAIRCASE
SOLAR TR
HEIGHT FI
10' - 0"


PROPERTY
LINE
SOLAR TRELLIS AT
10'-0" HEIGHT
FROM ROOF DECK
UNIT 14


PROPERTY LINE


PROPERTY
LINE





Patent #8,936,992

Dero **Decker**

The Dero Decker takes bike parking to the next level. Unlike other two-tier systems our mechanical lift-assist top trays slide down inches from the ground, thus requiring only minimal lifting of the bike into the tray while saving valuable floor space. The Dero Decker has a front wheel safety locking lever and dampers to provide safe lowering of upper trays. Add the e-bike charging option to let users power up their ride while parked.

12/2024

Dero **Decke**

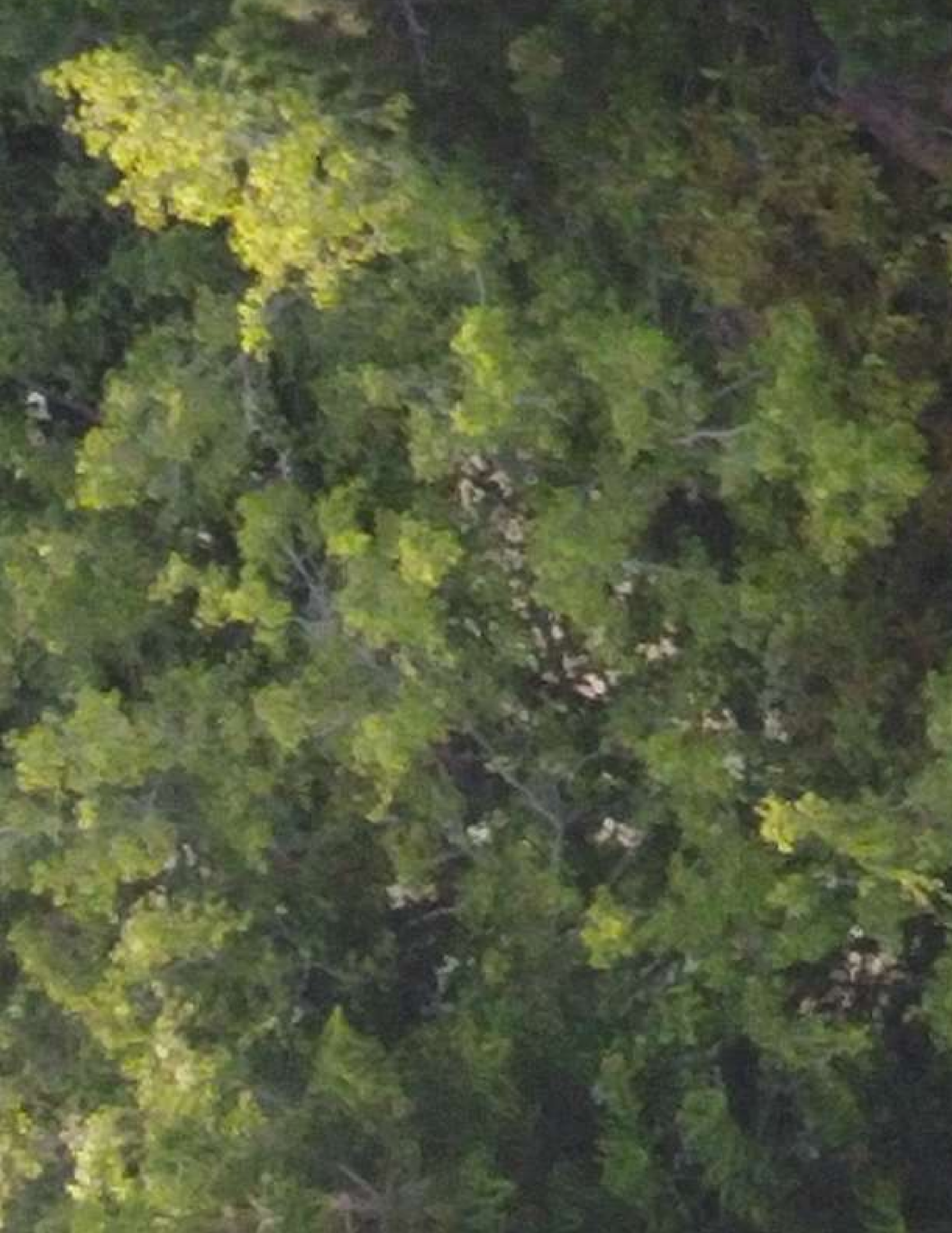




- Sturdy red handle grips
- Lift-assist trays *(weight limit 30lb*
- Dampers for safe lowering o
- Spring loaded levers hold bi firmly in place
- U-lock compatible
- E-bike charging option availa *(lower level only)*

Galvanized





Venice Neighborhood Council

P. O. Box 550, Venice, CA 90294

www.VeniceNC.org

December 9, 2025

Sienna Kuo, Planning Assistant
Sienna.Kuo@lacity.org
Los Angeles City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012

Re. 1410-1414-1422 Main Street, Venice
CPC-2021-2020-DB-CDP-SPPC-MEL-HCA; ENV-2021-2021-EAF

Dear Sienna,

The following motions were approved by the Venice Neighborhood Council (VNC) Board at its December 9, 2025 meeting:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

and

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

.

7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.

The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.

The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10' minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade

directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.

The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.

The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.

The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.

The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing

small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Please contact Mark Mack, Chair of the VNC Land Use & Planning Committee, at Mark.Mack@VeniceNC.org should you have any questions related to this letter and these motions.

Sincerely,

Brian Averill, President
On behalf of the Venice Neighborhood Council

cc:
Mark Mack, Chair, VNC Land Use & Planning Committee
Shannon Vaughn, Coastal Program Manager, California Coastal Commission
Dani Ziff, District Supervisor, California Coastal Commission
Craig Bullock, Planning Director, Council District 11
Jeff Khau, Planning Deputy, Council District 11
Sean Silva, Venice Field Deputy, Council District 11
Ira Brown, City Planner
Tony Russo, Crest Real Estate
Nick Leathers, Crest Real Estate

Attachment: LUPC Staff Report

Venice Neighborhood Council
LAND USE AND PLANNING COMMITTEE
PO Box 550, Venice, CA 90294 | www.VeniceNC.org
Email: Chair-LUPC@VeniceNC.org

Land Use & Planning Committee (LUPC)
STAFF REPORT
December 9, 2025

City Case No:	**CPC-2021-2020-DB-CDP-SPPC-MEL-HCA**
CEQA Case No:	**ENV-2021-2021-EAF: Categorical Exemption under CEQA sections 15301 (Class 1) and 15332 (Class 32)**
Related City Case No(s):	**CPC-2013-2377-DB-CDP-SPP-MEL**
Address of Project:	**1410-1414-1422 Main Street**
Applicant/Property Owner:	**Brittany Teague, Three on the Tree LLC, a Nevada LLC, and Three on the Tree Venice LLC, a Nevada LLC**
Applicant's Representative:	**Tony Russo, Crest Real Estate** **Matthew Royce, Architect**
Standard of Review:	**Coastal Act, with certified Land Use Plan (LUP) as guidance (for CDPs)** **Venice Community Plan** **Other applicable State laws: Assembly Bill 2097** **Other applicable City laws: ADU ordinance** **Mello Act & Housing Crisis Act**
Coastal Zone:	**Single Permit Jurisdiction**
City Hearing:	**December 10, 2025, 1 pm**
Email for City Planner:	**Sienna.Kuo@lacity.org**
LUPC Staff assigned:	**Robin Rudisill & Mark Mack**

I. Detailed Project Description:

Demolition of 2 single-family dwellings, and the construction of a 26,845 SF, 5-story mixed-use structure on 3 lots, consisting of 19 residential units, of which 4 residential units will be set aside for Very Low Income (VLI) households; 6,152 SF of restaurant uses including 3,177 SF of indoor dining Service Floor Area and 467 SF of outdoor dining Service Floor Area; 656

SF of office uses and a roof deck with a solar trellis covered rooftop and an elevator/roof access structure, providing 28 parking spaces (24 tandem residential use spaces and 4 commercial use spaces) within a one level subterranean garage.

Reason for VNC/LUPC hearing this project:

The project representative failed to inform the neighborhood, LUPC and the VNC of the project's changed scope and impact on the neighborhood since the VNC heard the project in early 2021, almost 5 years ago. They have not conducted the proper neighborhood outreach necessary for the increased size and scope of this project, causing a strong neighborhood resistance to the project.

Therefore, the Venice Neighborhood Council scheduled a LUPC hearing (December 4th) and a Special VNC Board hearing (December 9th) in order to assess this significantly changed project and the impacts it presents to the neighborhood.

Changes between original project that VNC heard in 2021 to current version of the project:

1. Unit count increased from 9 units to 19 units (4 of which are affordable).

2. Parking garage reduced from two subterranean levels with 56 parking spaces to one subterranean level with 28 parking spaces.

3. Access is not through Main Street but rather through the alley, a very narrow 15' wide alley.

4. 3 stories to 5 stories (4 stories + 1 story solar trellis covered rooftop, roof access structure and elevator).

5. Height increase from 30' to 46'- 4" (maximum height of 57'10" with 15', 176 SF elevator overrun (vs. 10', 100 SF RAS) and solar trellis covered rooftop)

6. FAR increased from 1.49 to 2.95.

7. Restaurant spaces added on 2nd and 3rd floors, resulting in commercial grade occupancy on the second and third level of the structure, overlooking and adjacent to neighboring low-rise residential buildings.

II. Motion 1:

The Venice Neighborhood Council strongly requests that the CD-11 Council Office request that City Planning postpone the City Planning hearing for the project at 1410-1414-1422 Main Street, currently scheduled for Wednesday December 10, 2025, until January 26, 2026 or after, in order to provide a reasonable amount of time for the Land Use and Planning Committee, neighbors and the Board to have our community public hearings in order to provide our recommendations.

Moved: Mark Mack
Seconded: Robin Rudisill
Vote: 6-1-1 (0 absent, 0 recused, 1 open seat)

III. Motion 2:

The Venice Neighborhood Council recommends denial of the project at 1410–1414–1422 Main Street, as proposed, based on the following findings:

1. Vehicular Accessibility: Very narrow alley will be overexposed to heavy daily traffic, loading zone nuisances and minimized turning radius for larger vehicles.

2. Height of project: Taller projects like this, double the LUP requirement, need height transitions to mitigate shade and sunlight access to the adjacent 1-2 story, residential historic neighborhood.

3. Lot consolidation: A 3-lot consolidation is not permitted.

4. Provides no Public Setback on Main Street: Needs better pedestrian circulation and the possibility to add more public green space on Main Street.

5. The law prohibits the demolition or conversion of residential structures for purposes of non-residential/mixed-use projects.

6. Accessibility fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility as well as mixing commercial and residential use within the building.

.

7. Open Space: The project requests a 100% reduction in usable open space and eliminates the step-back provisions.

8. Design: The project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout to maximize profitability.

9. Impact on Coastal Access: The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys.

Details of findings:

1. Substandard alley and unsafe access.
The project concentrates all vehicular access, garage entry, loading, trash, and service functions on a very narrow, non-conforming alley immediately abutting residential properties. That alley cannot safely accommodate the level of traffic, truck loading, turning movements, and rideshare/delivery activity generated by a 6,000+ square foot restaurant, 19 dwelling units, and office uses. The design provides no adequate turnaround or loading area, forcing vehicles to back or queue in the alley and creating unsafe conflicts with pedestrians, cyclists, and neighboring residents. This is an inappropriate and unsafe intensification of use on a constrained residential alley.

2. Excessive height, massing, and lack of transition.
The project seeks a maximum building height of approximately 57 feet 10 inches—nearly double the 30-foot height limit in the Venice Coastal Zone Specific Plan—and removes the required 45-degree step-back plane. It also requests major yard reductions on all sides and a FAR of 2.95, again, almost double the 1.5 FAR as limited in the Venice Specific Plan and certified Venice Land Use Plan (LUP). Together, these waivers create a five-story wall on a three-lot consolidation with no meaningful transition to the immediately adjacent 1–2 story residential neighborhood and the Lost Venice Canals Historic District, degrading the area's established low-scale character and scenic/visual qualities that the Coastal Act and certified LUP require to be protected.

3. Unpermitted lot consolidation of 3 lots

LUP I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10′ minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

4. Inadequate setbacks and pedestrian/greenspace realm on Main Street.
The project requests a zero-foot front yard setback for residential floor area where a 5-

foot setback is required, leaving essentially no room for street trees, landscaped parkway, pedestrian refuge, or outdoor gathering space. In combination with very shallow side yards, the building fills almost the entire site, pushing a tall, bulky façade directly to the back of sidewalk. This undermines the pedestrian experience on Main Street, provides no meaningful public or quasi-public open space at the ground level, and is inconsistent with Venice Coastal Zone LUP policies calling for human-scaled, walkable frontages, landscaping, and preservation of the special coastal community character.

5. Violation of the Mello Act and Housing Crisis Act – unlawful loss and conversion of coastal housing.
The project demolishes two existing single-family residential structures in the Coastal Zone and proposes a predominantly commercial/mixed-use building. The Mello Act prohibits the demolition or conversion of residential structures for non-residential use unless the City first finds, based on evidence, that residential use is no longer feasible at that location; no such finding has been made, and nothing in the record suggests residential use is infeasible. The existing buildings are legally permitted, functioning residential housing, and therefore are protected by the Mello Act regardless of the underlying C2 zoning. Any redevelopment must maintain residential use and comply with Mello Act "no-net-loss" and replacement-housing obligations; it cannot lawfully convert coastal housing into more lucrative restaurant and commercial space.

6. Accessibility and life-safety concerns.
The project, as presented, fails to demonstrate safe, convenient, and equitable access for people with disabilities and others with limited mobility. By locating all vehicular access and loading on a substandard alley without a separated pedestrian path of travel, and by heavily intensifying restaurant and service traffic in that same space, the design exposes residents, visitors, and workers using mobility devices, strollers, etc. to unacceptable conflicts with cars and trucks. The plans do not clearly show how accessible parking, loading, and routes from the garage and public sidewalks will be provided without requiring people with disabilities to share the narrow alley with moving vehicles. This is inconsistent with ADA and California Building Code objectives and with the Coastal Act's requirement that new development protect public safety and access for all users.

7. Complete failure to provide required usable open space.
The project requests a 100% reduction in usable open space—from 2,525 square feet required to zero—and eliminates the step-back provisions that would otherwise provide light, air, and semi-private outdoor areas for residents. Any roof deck is primarily designed to serve the commercial/restaurant component and does not substitute for dedicated, code-compliant common and private open space for the 19 dwelling units. The absence of meaningful on-site open space will significantly diminish residential livability, privacy, and access to light and air, particularly given the building's extreme massing, and is inconsistent with the Venice Coastal Zone

Specific Plan's and LUP's open space standards and the Coastal Act's emphasis on high-quality residential environments in the Coastal Zone.

8. Poor design and incompatibility with the historic, special coastal community context.
The project's overall design—five stories, maximal lot coverage, minimal articulation, zero front yard, and commercial restaurant floors stacked above ground level—is out of scale and character with the surrounding one- and two-story historic residential neighborhood and the Lost Venice Canals Historic District. Rather than stepping down to adjacent homes, the building presents tall, sheer walls and roof structures that loom over the alley and neighboring properties, degrading views, privacy, and the existing small-scale rhythm of Main Street. By using density bonus incentives and waivers to override key Venice Coastal Zone standards on height, setbacks, lot consolidation, and open space, the project fails to "harmonize" Density Bonus Law with the Coastal Act and instead attempts to maximize buildout at the expense of scenic and visual resources and the Venice "special coastal community" that the Coastal Act and LUP explicitly seek to protect.

9. Significant adverse impact on coastal access and parking.
The site is only a short distance from the beach in an area already severely constrained for parking and heavily relied upon by coastal visitors. The project seeks substantial relief from on-site parking requirements while adding a high-intensity restaurant and additional dwelling units, inevitably pushing more demand onto already oversubscribed public streets and alleys. Under Coastal Act §30252, new development must maintain and enhance public access by providing adequate parking or equivalent transit measures; AB 2097 does not override this Coastal Act mandate. Here, the requested parking reductions, combined with alley-only access and lot consolidation, will cumulatively reduce the availability of convenient parking for beachgoers and visitors, impairing coastal access and conflicting with both the Coastal Act and the certified Venice LUP. In addition, the traffic analysis excludes the restaurant uses entirely by claiming that all of the restaurants are "local serving," which is not true. This artificially keeps the project below the 250-trip threshold. This omission must be corrected and a DOT traffic analysis performed.

Moved: Mark Mack
Seconded: David Turnbull
Vote: 8-0-0 (0 absent, 0 recused, 1 open seat)

IV. Motion 3 (continued indefinitely):

The Venice Neighborhood Council strongly recommends that the project be confined to 100% residential, within the development standards and policies of the Venice Specific Plan and LUP, which would: provide homes, be compatible with the surrounding residential neighborhood character, not create the

significant adverse impacts and nuisances on the surrounding residential neighborhood that commercial businesses would, and not violate the state Mello Act.

Motion 3 continued indefinitely:

Moved: David Feige
Seconded: Mark Mack
Vote: 6-1-1 (0 absent, 0 recused, 1 open seat)

V. Pros & Cons of Project:

Positive aspects of project:
4 affordable units.

Negative aspects of project:
Concerns about hearing notices: Several parties indicated that they did not receive the hearing notice, including Rick Garvey (within 300 feet) and Dr. Khoe (adjacent).

See also detailed findings in LUPC motion, above.

I. Neighborhood Outreach/Summary of Community Input:

Describe neighborhood outreach by Applicant's Representative and LUPC Staff Member, in detail:

The applicant made it clear that they were not paid to do neighborhood outreach on the significantly changed project and that they did outreach on the original project. However, they did contact Karen & Art from the condo building across Main Street. Once LUPC became aware of the project hearing being scheduled, we immediately scheduled a meeting to hear it so that it could be heard by the VNC prior to the City hearing. We contacted the applicant's representative and met with them prior to the LUPC meeting. We informed a few of the neighbors, whom we were aware of were concerned about the project.

Summary of Community Input

Concerns expressed by Neighbors:
The proposed loading dock is not large enough to serve most of the 5 and 10 ton and larger trucks that make these deliveries, and so many will simply park in the alley, which will prevent residents, as well as emergency vehicles, from coming and going. Trucks will also park down the middle of Market St. It is not uncommon for several trucks to be making deliveries simultaneously.

The project is outrageous, this is overbuilding, this is egregious, this is greed.

When neighbors in the residential blocks behind the project to the east look out their windows, they will see a big 5 story wall and won't be able to see the sky any longer.

Concern about habitability of the residential units adjacent to upper floor restaurants. Concern about the mixing up of uses in a strange way on the upper floors. Concern about combining access/entrances for residents and commercial uses.

See additional concerns in these letters from the neighbors:
https://www.venicenc.org/assets/documents/5/meeting69332e44d78a1.pdf

Suggestions from Neighbors:
At the LUPC hearing a request was made to the applicant for a sun/shade study. As of the publishing of this LUPC Staff report, the applicant has not provided the study.

As per neighbor Irv Katz, he would ask the developers to consider confining this proposal to a 100% residential use, within the requirements of the Venice Plan, which would provide homes and not create the problems that commercial businesses such as a restaurant would, including no constant flow of traffic into or out of the garage and no daily deliveries to block the alley or streets or create noise.

The traffic analysis excludes the restaurant uses entirely from the trip count by claiming the restaurants are "local serving." But restaurants with alcohol and outdoor dining are not local serving uses. "Local serving" refers to small convenience businesses (e.g., laundromat, dry cleaner, etc.), not destination restaurants. Restaurants in Venice draw visitors from outside the immediate neighborhoods. Restaurants have a very high trip counts (sit-down restaurant approx. 100 trips per 1,000 SF), especially when they serve alcohol. Excluding the restaurants keeps the project below the 250-trip threshold, dodging a full transportation analysis. This must be corrected and a full analysis done. DOT must require the inclusion of the restaurants in the trip count, which will require them to perform a traffic analysis.

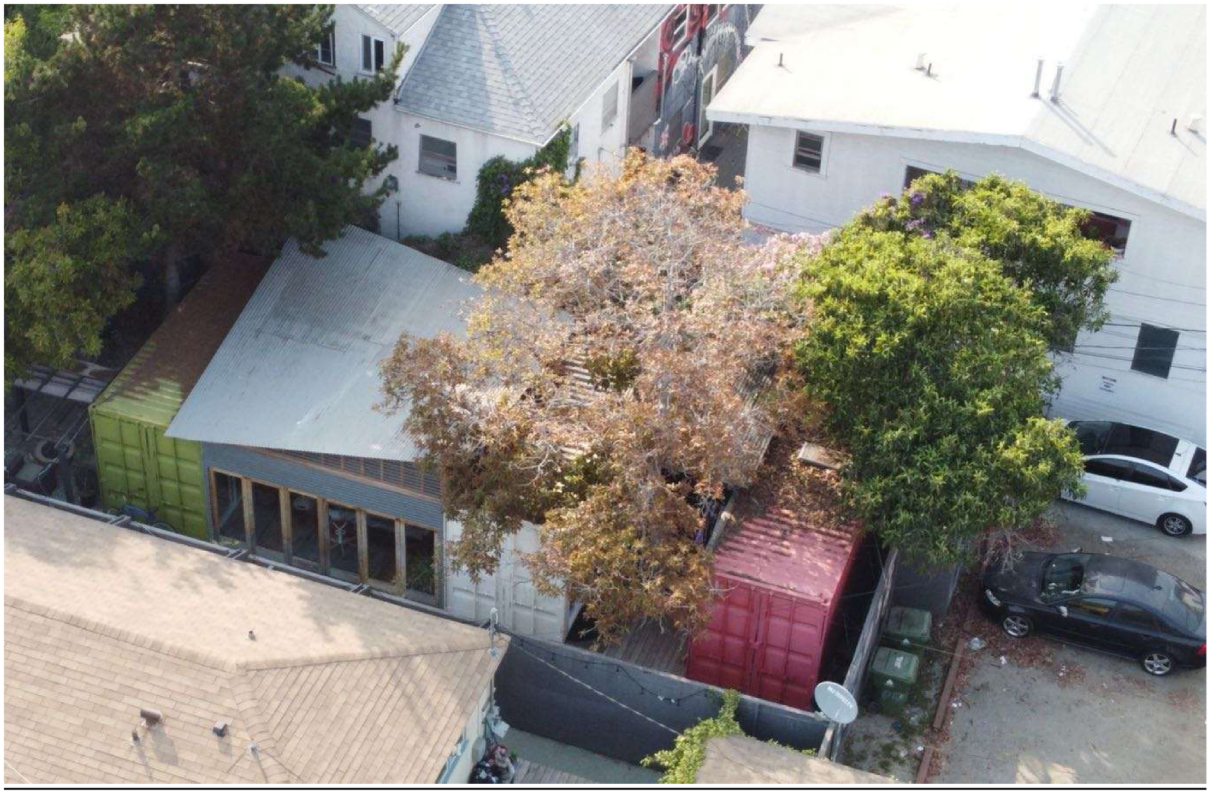
The project seems to be trying to fit too much into an inappropriate lot. That is a sure sign of a developer more interested in profit than community.

II. Findings re. Entitlements:

For your use in determining the entitlements, here is the link to the City Planning Prefix (approving entity) and Suffix (entitlements) Report where you can look up the City Case No. coding abbreviations:
https://planning.lacity.gov/resources/prefix-suffix-report

A. Coastal Development Permit (CDP) – Coastal Act & certified Land Use Plan (LUP) are standard of review

NOTE: The lot at 1410 Main St is vacant land as per ZIMAS. There is no Coastal Development Permit (CDP) approving a demolition of any structures that were previously on the 1410 Main St lot, which would imply that such a demolition must be covered with an after-the-fact approval in this CDP. However, the applicant provided a building permit application for demolition of an existing structure in 1968, which means this demolition was done pre-Coastal Act (57 years ago) and therefore doesn't require a CDP. It is unknown whether or why the lot has remained undeveloped for 57 years. The lot is currently used as residential/office space using converted shipping containers. The structures and uses currently on the vacant lot are not permitted and therefore constitute a violation of the Coastal Act as they are unpermitted development:



1. **Parking/Coastal Access – Assembly Bill 2097 must also be considered in the standard of review**

Coastal Act Section 30252 states: ***The location and amount of new development should maintain and enhance public access to the coast by facilitating the provision or extension of transit service…and providing adequate parking facilities or providing substitute means of serving the development with public transportation***

The project lies in an AB 2097 area and as such minimum parking cannot be required. However, the applicant proposes only 28 parking spaces, which is significantly lower than the parking minimums required by the Venice Specific Plan and certified Land Use Plan (LUP). No proposed mitigations were noted. The 15' alley is too narrow for any real use, especially one that requires truck traffic, 2-way traffic, or a clear path for others to access parking spaces. Most Venice alleys are 25' and it is still difficult to enter one's garage nor can two cars pass.

2. **Scenic and Visual Qualities**

Coastal Act Section 30251 Scenic and visual qualities states: ***The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.***

At 5 stories and 57'10", and spanning three lots with no visual breaks, the project is in no way compatible with the character of the surrounding area, which is primarily 1-lot, 2-3 story structures. The project violates Coastal Act Section 30251.

3. **3-Lot Consolidation**

Certified Land Use Plan Policy I.B.7. limits commercial lot consolidations to two lots, or three lots with subterranean parking that is fully depressed with roof at natural grade and the structure must not look consolidated (breaks in front wall of 10' minimum). The only exception for more than a 2-lot consolidation is for mixed-use projects that conform to the existing scale and character of the surrounding community and provide adequate on-site parking. This project is in significant non-compliance with both of the exception requirements.

Policy I. B. 7. Commercial Development Standards. The following standards shall apply in all commercial land use designations, unless specified elsewhere within this Land Use Plan.

Density/Intensity: Maximum Floor Area Ratio (FAR)

0.5 to 1 for retail only (including restaurants)
1.0 to 1 for retail / office
1.5 to 1 for retail and/or office and residential

Parking: See Land Use Plan Policies II.A.3 and II.A.4.

Lot Consolidation. Two commercial lots may be consolidated, or three with subterranean parking with the following restrictions:

1. Methods for insuring that the structure does not look consolidated (breaks in front wall of ten feet minimum) shall be utilized.

2. Subterranean parking shall be fully depressed with roof at natural grade.

Exception: Lot consolidation of more than two lots shall be permitted for mixed-use projects which conform to the existing scale and character of the surrounding community and provide adequate on-site parking.

Building Separation: A minimum of five feet between commercial and residential buildings (except for mixed-use projects).

Yards: Per the following Ground Level Development Policy which requires that commercial development be designed in scale with, and oriented to, the adjacent pedestrian accessways (i.e. sidewalks).

Ground Level Development: Every commercial structure shall include a Street Wall, which shall extend for at least 65% of the length of the street frontage, and shall be located at the property line or within five feet of the property line, except on Ocean Front Walk, where all commercial buildings shall have the Street Wall set zero (0) feet from the building line. The required Street Wall at sidewalk level shall be a minimum of 13 feet high. (A Street Wall is the exterior wall of a building that faces a street.)

Street Walls adjacent to a sidewalk café, public plaza, retail courtyard, arcade, or landscaped area may be setback a maximum of 15 feet along the project which consists of the sidewalk café, public plaza, retail courtyard, arcade, or landscaped area. Such areas shall not be considered in calculating the buildable area of a project but, with the exception of areas used only for landscaping, shall be considered in calculations for required parking.

At least 50% of the area of the ground floor Street Wall shall be devoted to pedestrian entrances, display windows, and/or windows affording views into retail, office, gallery, or lobby space.

Blank walls shall be limited to segments of 15 feet in length, except

4. Protection of Special Coastal Communities

Coastal Act section 30253(e) states: ***New development shall do all of the following…(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.***

LUP Policy Preservation of Venice as a Special Coastal Community states:

Preservation of Venice as a Special Coastal Community	**Policy I. E. 1. General.** Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.
	Policy I. E. 2. Scale. New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect
	Policy I. E. 3. Architecture. Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

According to ZI 2453, the project is located in the Lost Venice Canals Historic District, which is significant as a unique example of early-20th century residential development oriented around the original Venice canals developed by Venice of America founder Abbot Kinney. The district was evaluated as a whole and individual properties were surveyed and identified as Potential Contributors or Non-Contributors to the district, or as Not Sure (properties generally not visible from the public right-of-way). Properties identified as Potential Contributors or Not Sure in SurveyLA, unless otherwise found exempt, will be reviewed by the Department of City Planning, in consultation with its Office of Historic Resources, to determine if the property is a "historical resource" as defined in CEQA. If the City determines the property to be a historical resource, the City will evaluate if the project would have significant impacts to the historical resource. Even if the property is not determined to be a historical resource, the City will evaluate if the project would have an impact on other nearby historical resources, which may include the potential historic district.

The structure on 1422 Main St was identified as "Not Sure" in SurveyLA, which means that it should be reviewed by the Department of City Planning, along with the Office of Historic Resources, to determine if the property is a historical resource. Excerpt from SurveyLA:

Venice Report

Historic Districts, Planning Districts and Multi-Property Resources – 04/02/15

SurveyLA
Los Angeles Historic Resources Survey



Primary Address:	1422 S MAIN ST
Type:	Not sure
Year built:	1921
Property type/sub type:	Residential-Single Family; House
Architectural style:	Craftsman

It is not clear whether the City's Office of Historic Resources has analyzed the project's impact on the historic district.

Venice was designated as a "Special Coastal Community" by the City of Los Angeles and the California Coastal Commission, as documented in the LUP. The definition of Special Coastal Community is: "An area recognized as an important visitor destination center on the coastline, characterized by a particular cultural, historical, or architectural heritage that is distinctive, provides opportunities for pedestrian and bicycle access for visitors to the coast, and adds to the visual attractiveness of the coast." If the Lost Venice Canals Historic District is degraded by a project such as this that is so significantly out of compliance with the LUP in so many ways, the risk of Venice losing its Special Coastal Community status is increased because the very definition of Venice as a Special Coastal Community relies on Venice's historical heritage. Thus, the project does not protect the Special Coastal Community of Venice and in fact degrades it and thus is in violation of Coastal Act section 30253(d) and LUP Policy I.E.1.

As stated in ZI 2453, the Lost Venice Canals Historic District is a residential neighborhood with boundaries coinciding with those of Venice's original canal district. Streets throughout the district exhibit an irregular pattern which reflects the area's original network of canals. Development in the district is primarily residential. Original single and multi-family residences were constructed primarily from the 1910s through the early 1920s and are one or two stories in height. Other features of the district include the unique configuration of the streets, which create irregularly shaped blocks originally bounded by canals.

According to ZI-2453, the Lost Venice Canals Historic District is significant as a unique example of early-20th century residential development, oriented around the original Venice canals developed by Venice of America founder Abbot Kinney. The district's period of significance is 1904 to 1929, encompassing the period during which the canals were extant. The district represents the area set aside by Kinney for residential development in Venice. After a years-long legal battle between residents and city officials, in 1929 the Venice of America canals were filled in and paved over. Today, the Lost Venice Canals Historic District stands out from surrounding development due to its unique planning and development around Venice's original system of canals. Despite a relatively low percentage of contributing properties, ***the neighborhood retains a distinctive feel that conveys a strong sense of time and place.***



As with the first attempt at a development project at this site in 2014, which was withdrawn within one year of application, the historic preservation issues remain unaddressed.

5. **Cumulative Effect**

Coastal Act section 30250 (a) 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…***

This project violates Coastal Act Section 30250(a) because it places a large, high-intensity mixed-use development in a built-out, historic, low density coastal neighborhood that is not "able to accommodate it" in terms of circulation, parking, and public services, as shown by the documented loss of required parking and substandard alley access. By over-concentrating development on this constrained site and worsening traffic and parking conditions that already limit public access to the beach, the project will have significant adverse cumulative effects on coastal resources, contrary to section 30250(a).

B. Density Bonus Act (DB)

1. The "Major Transit Stop" qualifying the project is at Windward Circle.

2. With 4 Very Low Income (VLI) units, the project qualifies for 4 incentives (unlimited waivers of development standards is allowed).

The following Density Bonus incentives are requested:

1. Off Menu request for a Floor Area Ratio (FAR) increase of 96.6 percent resulting in a FAR of 2.95, in lieu of a FAR of 1.5, as otherwise required by the Venice Coastal Zone Specific Plan Section 11.B.3.
2. Off Menu request for a northwesterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.
3. Off Menu request for a southeasterly side yard of 5 feet in lieu of 8 feet, as otherwise required in the C2 Zone pursuant to LAMC Section 12.14 C.2.
4. A zero-foot front yard setback for residential floor area, in lieu of 5 feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.f.4(a).

The following Waivers of Development Standards are requested:

1. Maximum building height of 57' 10", in lieu of 30', as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F.3.
2. 100% decrease in usable open space from 2,525 square feet required.
3. Removal of the step back provisions, in lieu of a 45 degree step back plane, as otherwise required by the Venice Coastal Zone Specific Plan Section 10.F(3)(a).
4. A Roof Access Structure with a maximum height of 15 feet in lieu of 10 feet, as otherwise required pursuant to the Venice Coastal Zone Specific Plan Section 9.C.
5. A Roof Access Structure with a maximum exterior dimension of 176 square feet in lieu of 100 square feet, as otherwise required by the Venice Coastal Zone Specific Plan Section 9.C.

3. Harmonizing of State Density Bonus Act and State Coastal Act

Government Code Section 65915(m) of the state Density Bonus law states that all density bonus incentives, waivers, etc. to which the applicant is entitled under Government Code Section 65915 shall be permitted in a manner that is consistent with both the Density Bonus law and the Coastal Act. The State Legislature's intent is that the two statutes be "harmonized" so as to achieve the goal of increasing the supply of affordable housing in the Coastal Zone while also protecting Coastal Resources and Coastal Access.

According to the Coastal Commission's February 6, 2019 Report (W7f), the two state laws are to "be harmonized to provide for affordable housing in the Coastal Zone in a manner that is consistent with Coastal Act resource protection policies and ensures that the Act's scenic and visual resources policy is not used erroneously as a basis for blocking density bonus projects in the Coastal Zone." This means that the question is whether a project is

seeking the minimum incentives and waivers necessary to provide for the affordable units. The problem in determining the answer is that State Density Bonus law mandates that evidence of the need is not required. Therefore, applicants are able to ask for more incentives and waivers than they need to cover the cost of providing the affordable housing, which appears to be the case for this project.

This project does ***not*** harmonize the State Density Bonus Act and State Coastal Act due to the **extreme de facto variances** from the development standards and policies of the Venice Specific Plan and LUP—3-lot consolidation rather than the maximum of 2, almost doubling of the height to 57'10" vs. the LUP requirement of 30', essentially doubling of the FAR (2.95 vs. allowable 1.5), removal of the step back provisions, 3' reduction of both side yards.

For example, in the 657 Sunset case, the LUPC concluded that, on balance, the requested incentives and waivers were modest compared to typical density bonus projects in non-Coastal Zone areas of Los Angeles, and that the project omitted a roof deck, kept the fourth floor stepped back, and provided 24% VLI units, such that the density bonus incentives could be harmonized with Coastal Act resource protection for that project.

However, for 1410-1414-1422 Main, the applicant is requesting relief from several of the most sensitive standards in the Venice Coastal Zone:

- Almost doubling the height
- Essentially doubling of the maximum FAR
- Major yard reductions on all sides
- No step backs
- Significant reduction in on-site parking relative to VCZSP/LUP requirements in an area that is extremely close to the beach
- Consolidation of three lots (beyond the 2-lot maximum per VCZSP/LUP)

The project's design seeks to maximize buildout in every dimension. The applicant has not demonstrated that all of these requested incentives and waivers are the minimum physically necessary to accommodate the 4 affordable units. As a mixed-use project, the incentives--which are larger than others requested in the Venice Coastal Zone used to fund the provision of affordable units--not only provide for enough market rate residential units to fund the affordable units, but the incentives also provide a significant benefit in terms of the commercial uses, which are 25% of the project (6,808 SF/26,845 SF), which is an exploitation of the Density Bonus law.

Given the size and intensity of the proposed structure, it appears highly likely that a shorter, less massive building could still provide a meaningful number of affordable units while protecting coastal resources.

Under §65915(m), the City cannot treat the Density Bonus Law as overriding the Coastal Act or the LUP. Instead, the City must limit or deny incentives and waivers that would

otherwise cause the project to conflict with Coastal Act resource protection policies, including:

- Significant adverse impacts on coastal access and parking
- Degradation of scenic and visual resources in a highly scenic area--the Lost Venice Canals Historic District
- Harm to a recognized Special Coastal Community

The City is obligated to withhold those specific waivers and require redesign so that affordable housing goals and coastal protection goals are ***both*** honored.

The project does *not* comply with the Density Bonus Act because the project, as proposed, does not harmonize the Density Bonus Law with the Coastal Act. Instead, it uses density bonus tools to attempt to override key coastal protections (height, parking, FAR, massing, lot consolidation) in a manner that is directly contrary to §65915(m)'s command that density bonus entitlements be granted only in a Coastal-Act-consistent manner. This project is an abuse of the Density Bonus law.

4. LUP Policy I.A.13. Density Bonus Applications

Policy I. A. 13. Density Bonus Applications: ***Required replacement dwelling units shall be counted as reserved units in any related State-mandated density bonus application for the same project. In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915 provided that the affordable housing complies with sections a – f of Policy I.A.13.***

The project does ***not*** conform with LUP policy I.A.13. for all of the same reasons noted above that it does not comply with the Density Bonus Act.

C. Mello Act (MEL)

This project violates the Mello Act (Gov. Code §§65590–65590.1). The Mello Act state law protects housing in the Coastal Zone. The purpose of the Mello Act is three-fold: *to maintain existing residential structures*, to protect existing affordable *units*, and to provide new affordable housing in new developments. The law states:

> "The conversion or demolition of any residential structure for purposes of a nonresidential use which is not coastal dependent...shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."

The statute flatly prohibits demolishing or converting an existing residential structure to a non-residential use that is not coastal-dependent unless the local government first determines, based on evidence, that residential use is no longer feasible at that location. No such feasibility finding has been made here, and the facts show the opposite:

- The legal, permitted use of the existing buildings is residential.
- The structures are functioning residential housing in a residential context.
- Nothing in the record shows that continued residential use is infeasible—only that the applicant ***prefers*** a more lucrative commercial/mixed-use project.

The legal, permitted use for the existing structures is residential; thus, they are protected by the Mello Act regardless of the underlying zoning designation, and any project for these properties must be residential use only. The Mello Act state law does not distinguish between zones, it protects all residential structures and affordable units, regardless of what zone they are in. The project cannot be approved as a mixed-use project whose purpose is to convert coastal housing into any portion of commercial space.

The Mello Act was enacted to prevent exactly this pattern—the erosion of coastal housing stock, especially lower-cost units, in favor of high-profit commercial uses, just like this project. Approving this project would defeat the very purpose of the statute and would be inconsistent with both state law and the City's own Mello Act implementation procedures.

The applicant believes that because the City, in 2019, proposed a Mello Act ordinance that would have allowed demolition of a residential structure for purposes of a mixed use project if the project provided all required replacement affordable and inclusionary units, that they could do so with the proposed project. However, this provision would have constituted a change to the existing Mello Act law and City Mello Act policy, and the draft ordinance was never approved. The Council file (15-0129-S1) expired in November 2023 and in fact no effort has been made since then to resurrect this significant proposed change:

> Proposed new LAMC 12.21H.c.7.: "Mixed Use Development. A proposed mixed use development may not result in a net reduction in the total number of existing Residential Units unless a residential use is no longer feasible. A mix of uses is permitted, so long as the structure provides all required Replacement Affordable and Inclusionary Units."

The fact that City Planning was requesting this change in their draft of the Mello Act ordinance shows that it is not currently allowed; otherwise, they would not have wanted or needed to add this provision.

See Attachment I for a May 4, 2021 letter from housing rights and environmental/land use attorney Venskus & Associates and the California Women's Law Center that explains why this proposed change would be unlawful and could not have been lawfully approved. As stated in this letter: "One of the main avenues the Mello Act proscribes for protecting residential housing is to limit the ability to convert existing residential structures to non-

residential uses. To allow such conversions would not only violate both the letter and the spirit of the Mello Act, but it would plainly threaten housing, by allowing its destruction for purposes of a more lucrative commercial use, including mixed use projects, thus displacing families and damaging coastal communities that are already holding on by a thread—exactly what the Mello Act was intended to prevent." The Applicant's demolition of the existing residential structures for purposes of a non-residential mixed-use project is a violation of the Mello Act and the City's Interim Administrative Procedures for complying with the Mello Act, and thus this mixed-use project is a non-starter.

In addition, in its letter dated October 19, 2021 regarding the draft Mello Act ordinance, the Coastal Commission Staff stated: "The mixed-use development policy outlined [in the draft Mello Act ordinance, proposed new LAMC 12.21.H.5.c.7] is therefore not consistent with the Mello Act, since it expands the definition of "residential structure" beyond the intent of the Mello Act. Commission staff is aware of several recent developments, especially in Venice, that have already incorporated draft language of this ordinance to justify approval of the demolition or conversion of residential properties for purposes of mixed-use properties along commercial corridors."

Lastly, the City's May 18, 2022 letter from the Los Angeles Housing Department with the subject "Mello Act Determination" is a determination with respect to only one requirement of the state Mello Act--the affordability of the existing units. As per the City's Mello procedures, the overall Mello Act Determination would be included in the related discretionary permit, the Coastal Development Permit, where all three Mello Act requirements would be considered: *whether existing residential structures are being replaced only with residential structures*, whether existing affordable *units are being replaced*, and whether inclusionary affordable housing is being provided.

D. Housing Crisis Act (HCA)

According to the City in its October 29, 2025 letter from the Los Angeles Housing Department, of the two units that existed on the properties within the last five years, one unit will remain protected by the RSO, one unit must be replaced as an affordable unit, and one unit must be replaced at market rate. The residential unit(s) demolished in 2018 are not covered in this analysis because they occurred more than five years prior to the date of Housing's affordable units determination, October 29, 2025.

E. Add any other applicable entitlements here, such as SPPE (Specific Plan Project Exception), ZAA (Zoning Administrator Adjustment), etc.

It is not clear why the original project's entitlement request for a waiver of dedication is no longer being considered.

Prior VNC letters for same/similar location:

In 2021, the VNC heard the original project proposed under this application, which was significantly different, i.e. 3 stories v. current proposed 4 + 1 story for solar with trellis ceiling, and 9 dwelling units v. current proposed 19 dwelling units, etc. The VNC Board supported the project but only if the underground mechanical room was removed, the entrance to the parking garage and the loading zone were moved from the alley to Main Street, and deliveries were restricted to 8 am to 8 pm. Also, the applicant was to clarify whether the proposed solar structures are compliant with city code and/or mandated by State law:

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

June 23, 2021

By email
Bindu Kannan bindu.kannan@lacity.org

Dear Bindu Kannan:

Please be advised that at a regular public meeting of the Venice Neighborhood Council (VNC) Board of Officers held on June 15, 2021, the following Land Use Planning Committee (LUPC) motion was approved.

Project Description: 1410 -1422 Main Street APCW-2021-2020-CDP-MEL-SPE-SPP-WDI. Demolition of the (2) existing single family dwellings and the construction of a new 3-story mixed use building (commercial + 9 new dwelling units) and a 2-story basement garage on (3) lots.

MOTION: The Venice Neighborhood Council recommends approval of the project with the following conditions:

1. Remove the underground mechanical room
2. Make the entrance/exit the project on Main Street, and the loading zone on Main Street. City to stripe the pavement accordingly.
3. Deliveries not prior to 8am and not after 8pm
4. Applicant to clarify whether the solar structures as proposed are compliant with city code and/or mandated by State law

ACTION

it was approved by a vote of 12-5-1.

Respectfully submitted,

Ira Koslow
President
Venice Neighborhood Council
www.venicenc.org

It's YOUR Venice - get involved!

In 2014 the VNC heard a different Density Bonus project on the site, which was slightly larger. The Board recommended denial of that project due to: excessive incentives requested, inconsistency with the surrounding neighborhood character, mass and scale, applicant's failure to show that the incentives requested were necessary to make the housing units economically feasible, excessive FAR, danger of extremely poor circulation with the parking entrance on the back alley, excessive lot consolidation, no demand management strategy, and unaddressed historic preservation issues. That application was withdrawn in 2015.

Venice Neighborhood Council
PO Box 550, Venice, CA 90294 / www.VeniceNC.org
Email: info@VeniceNC.org / Phone or Fax: 310.606.2015

April 21, 2014

Linn Wyatt
Chief Zoning Administrator
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012-2601

Case Number: CPC-2013-2377-DB-CDP-SPP-MEL
Project: 1414 Main Street, Venice 90291
Description: Density Bonus (Off-Menu) with 5 incentive requests, SPP, CDP, Mello Act compliance review to develop a 46-feet/4-stories, 91,968 square foot, mixed-use development.

To Linn Wyatt,

Please forward the **DENIAL** of the proposed project to the appropriate Zoning Administrator for this project once that person is assigned. This will advise that at a regularly held public meeting of the Venice Neighborhood Council's (VNC) Board of Officers on March 18, 2014, it was moved and passed by the Venice Neighborhood Council as follows:

MOTION:
The Venice Neighborhood Council recommends DENIAL of the project as presented based on:
- Excess of off-menu affordable housing density bonus incentives (five vs. three that are specified by SB 1818).
- Inconsistency with the character, mass, and scale of the surrounding neighborhood
- The applicant's failure to show that the off-menu incentives are necessary to make the housing units economically feasible (especially in lieu of cost to develop 89 excess parking spaces).
- Excessive FAR.
- Danger of extremely poor circulation with the parking entrance onto alleyway Toledo Court (except for residences and employees).
- Excessive lot consolidation.
- Missing transportation demand management strategy.
- Unaddressed historic preservation issues.

ACTION: Motion made by Ira Koslow, seconded by Marc Saltzberg. Motion to DENY the project approved 14-1-1

It's YOUR Venice - get involved!

Photos of existing:

Alley (15′ wide)—from south/Market St. Note: 2 normal sized cars cannot pass.



Alley (15′ wide)—from North/Horizon Ave. Note: 2 normal sized cars cannot pass.



Main Street frontage—3 lots between 5-unit apartment building to the left and commercial building to the right.






GREAT
ANYTHING &
TOUGH YET
COMPLETELY
SENSITIVE &
CARING.
EVERYONE
LOUD MAX
ROCCO

1422 Main St lot from Alley



1414 Main St lot, from Alley



1410 Main St lot from alley



Unpermitted structure in 1410 Main St vacant lot:



I. Existing Site Plan:



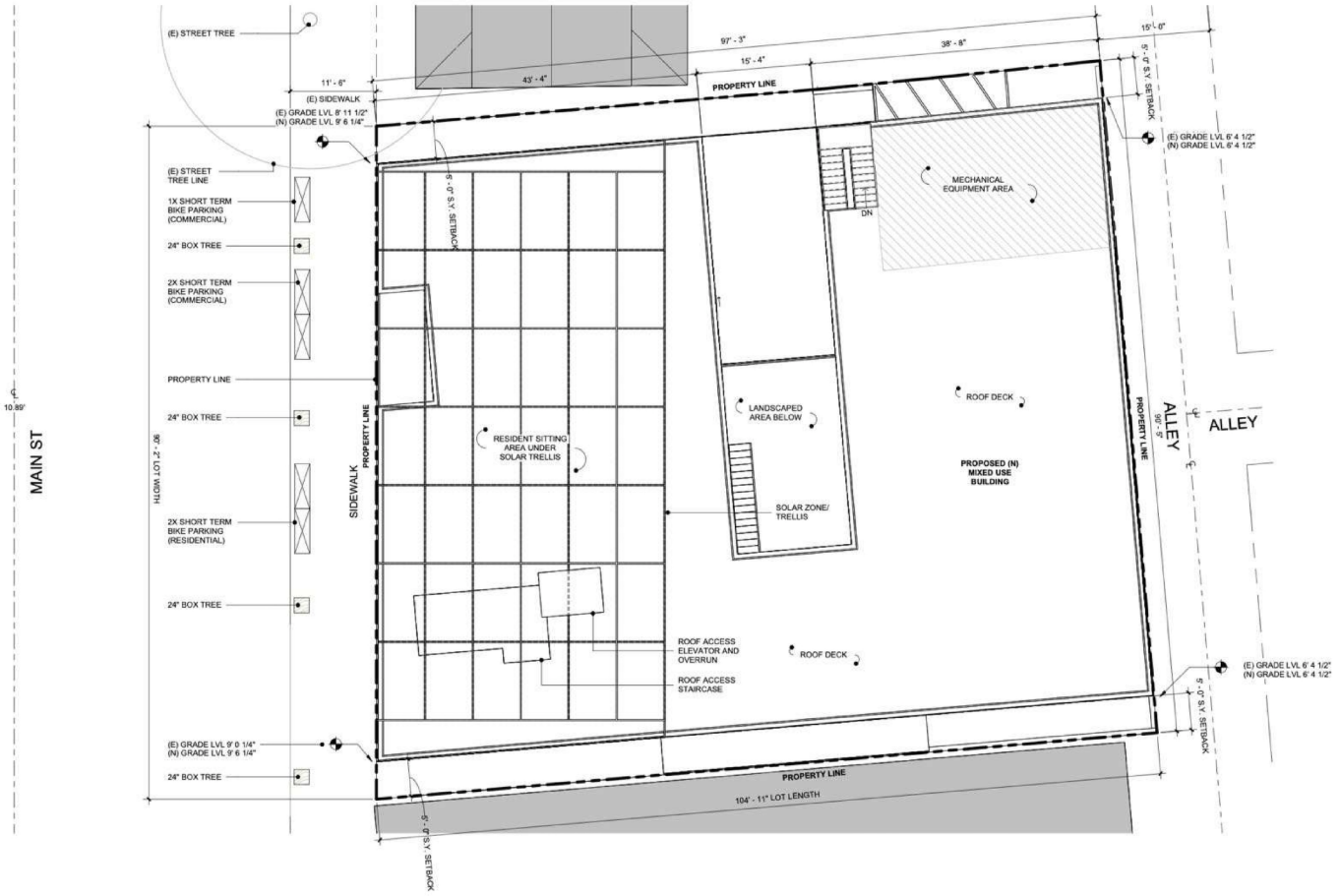
II. **Renderings of proposed project**




MAIN
APTS
RESTAURANT
RESTAURANT


MAIN
APTS
STAURANT
STAURANT

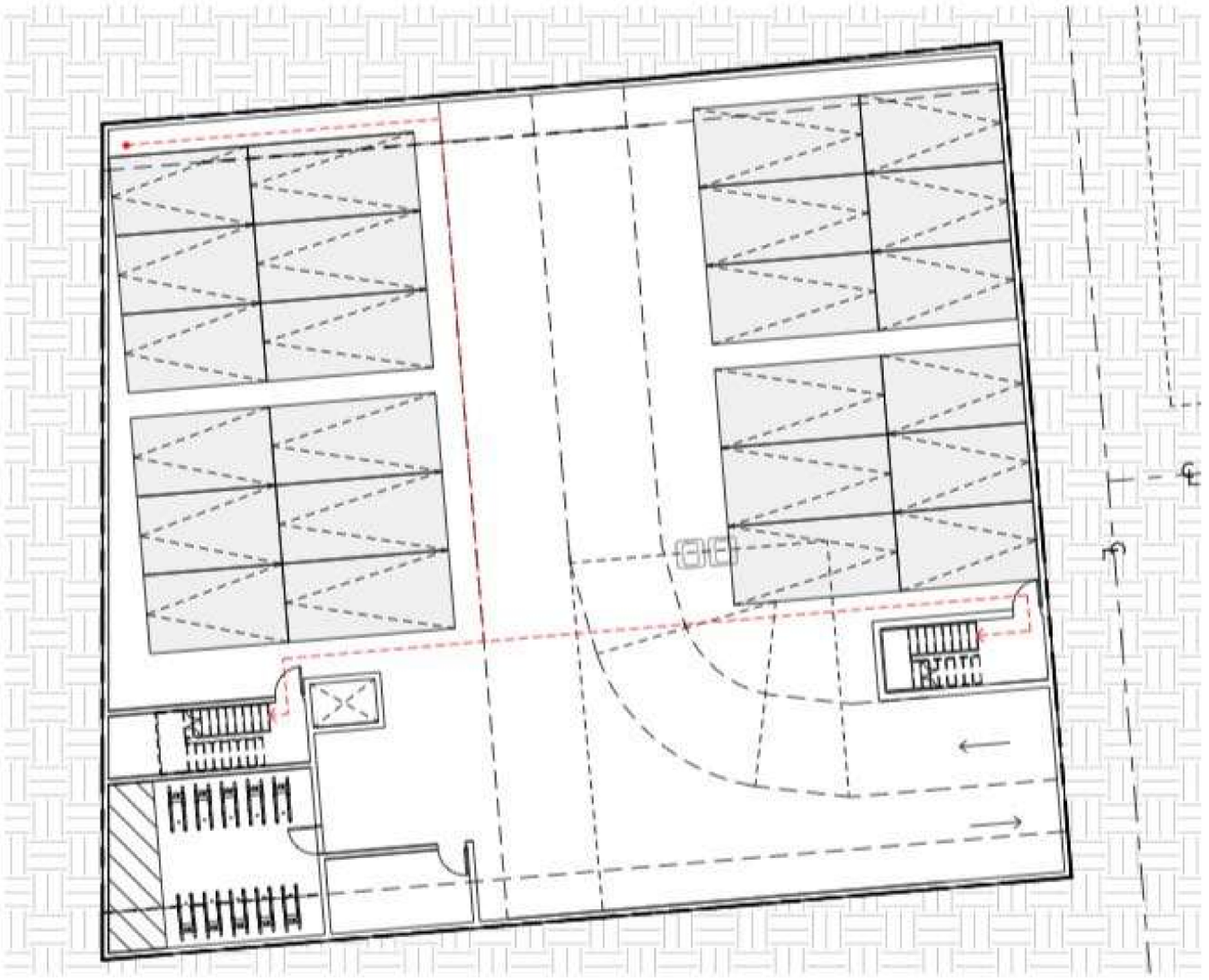
III. Site Plan:



IV. Floor Plans (detail/color)

Basement (detail/color). Note 2 tandem parking spaces for each residential unit.





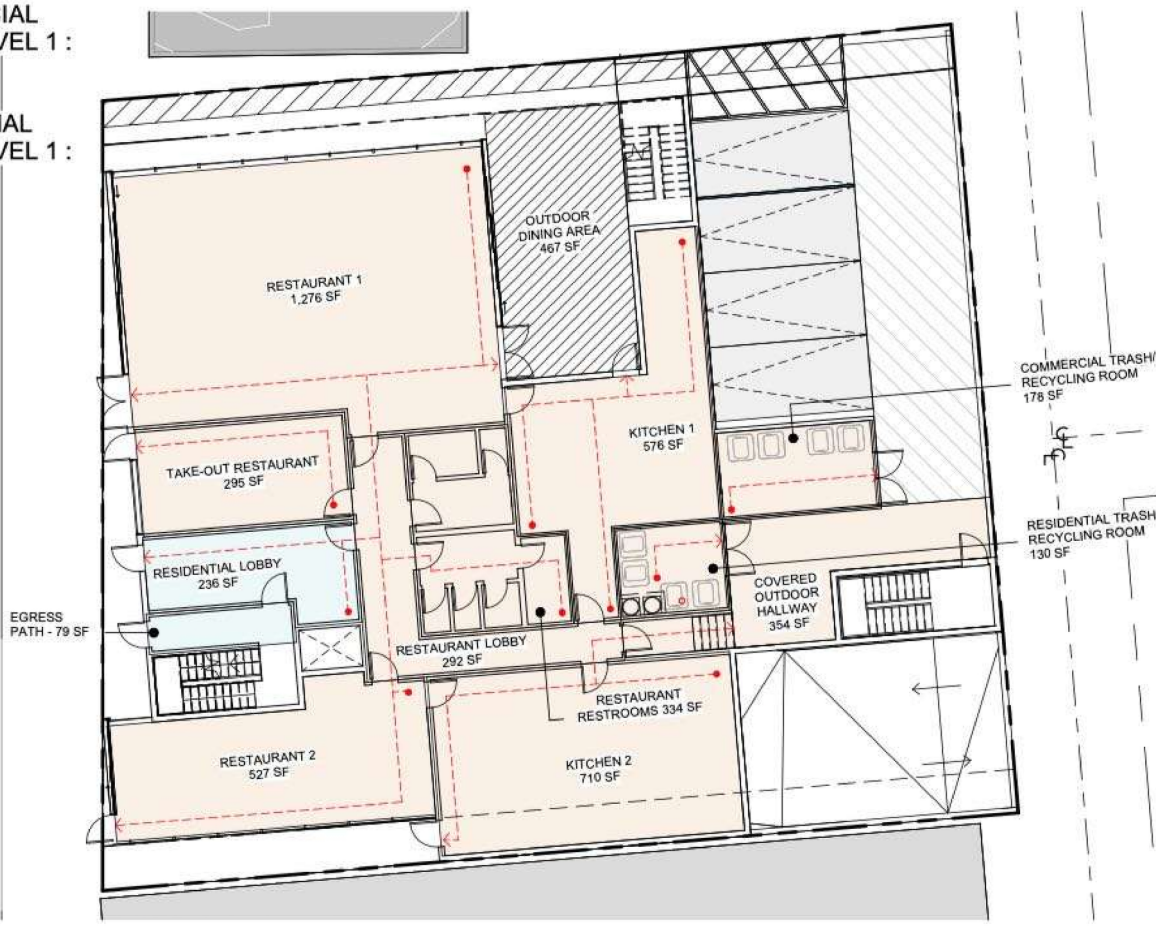
1 LV B1 PARKING - AREA PLAN
1/16" = 1'-0"

Ground Floor Plan (detail/color). Note 4 parking spaces for the restaurant, with loading zone behind.



TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 4,542 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 445 SF



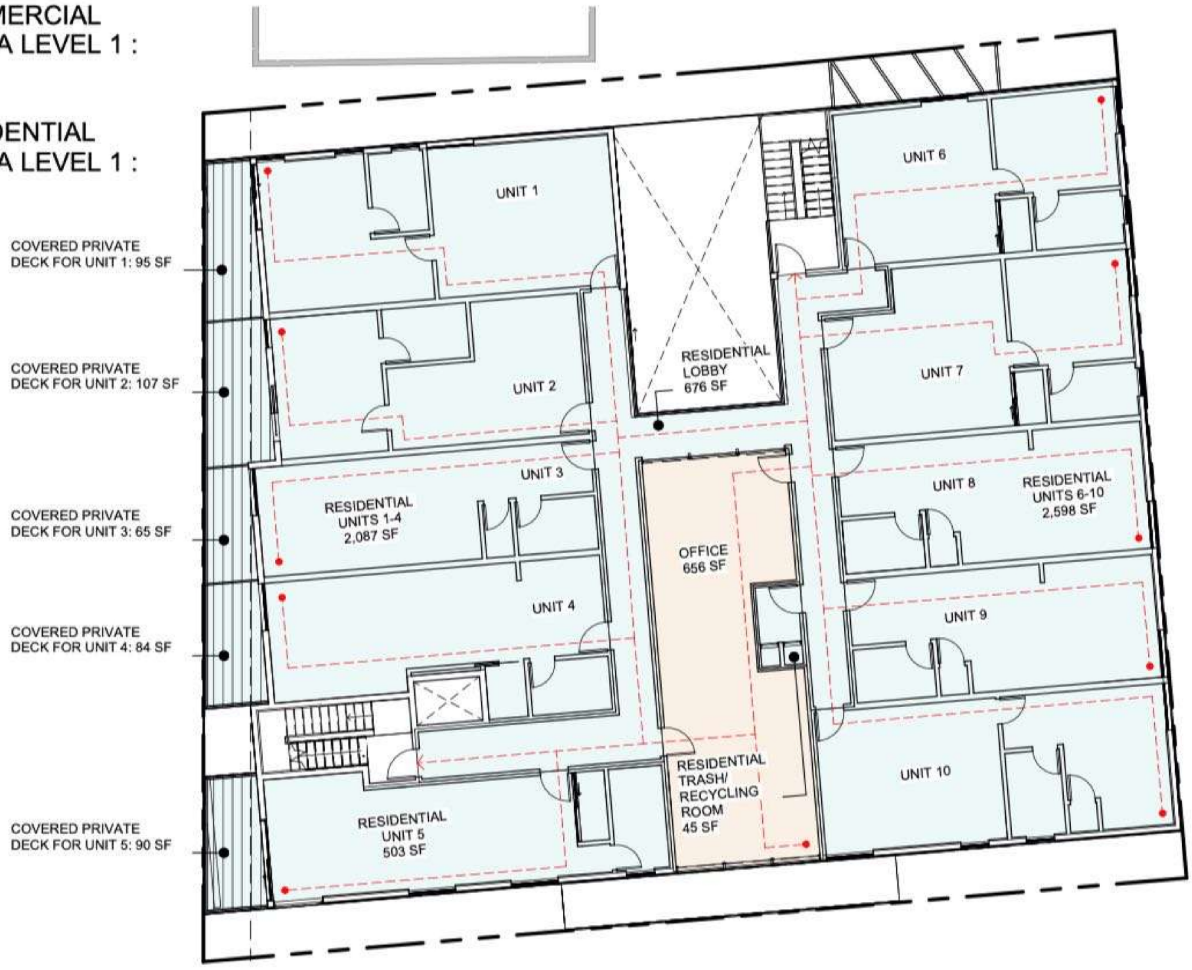
2 LEVEL 1 - AREA PLAN
1/16" = 1'-0"

Second Floor Plan (detail/color)



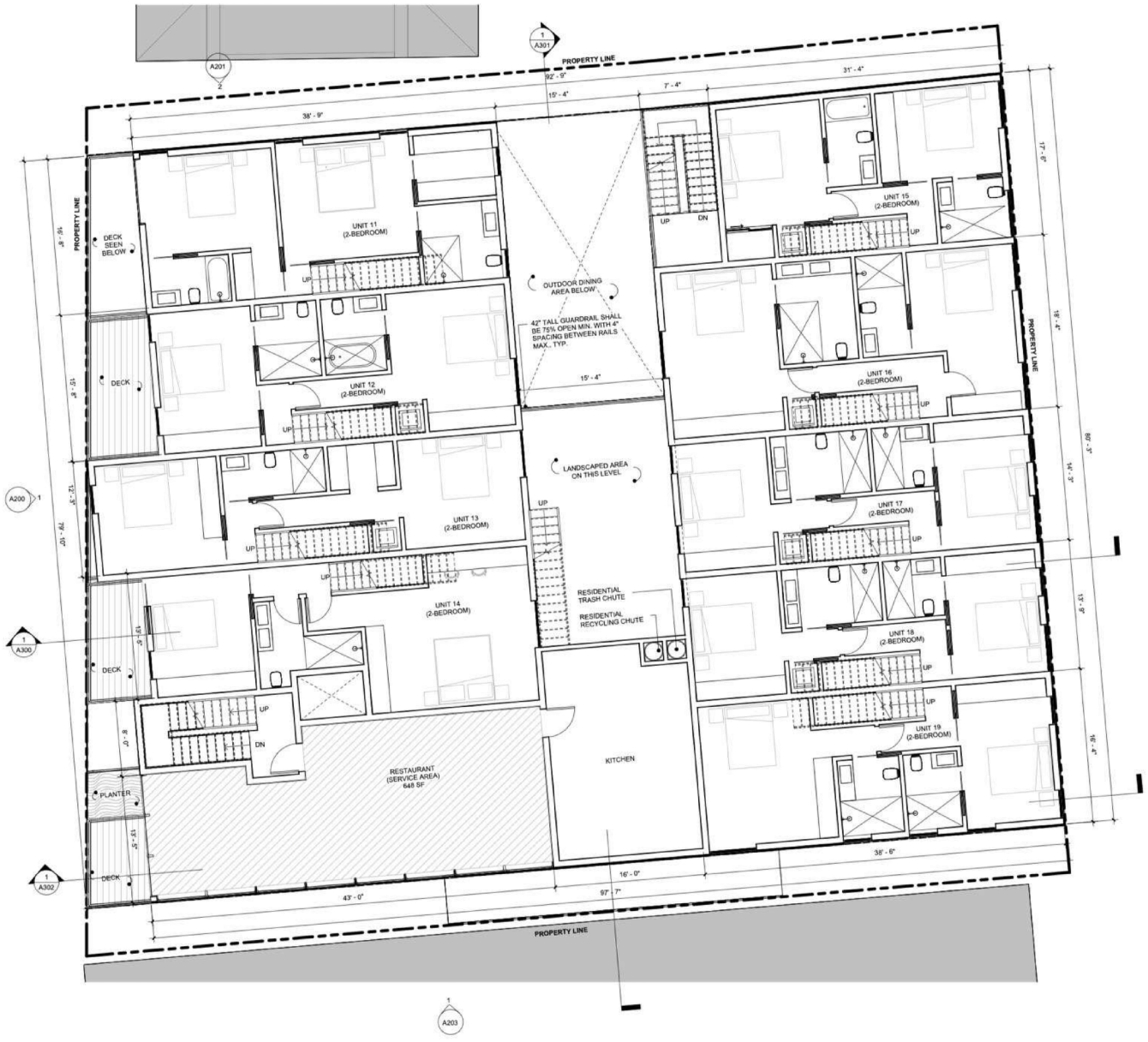
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 656 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 6,351 SF



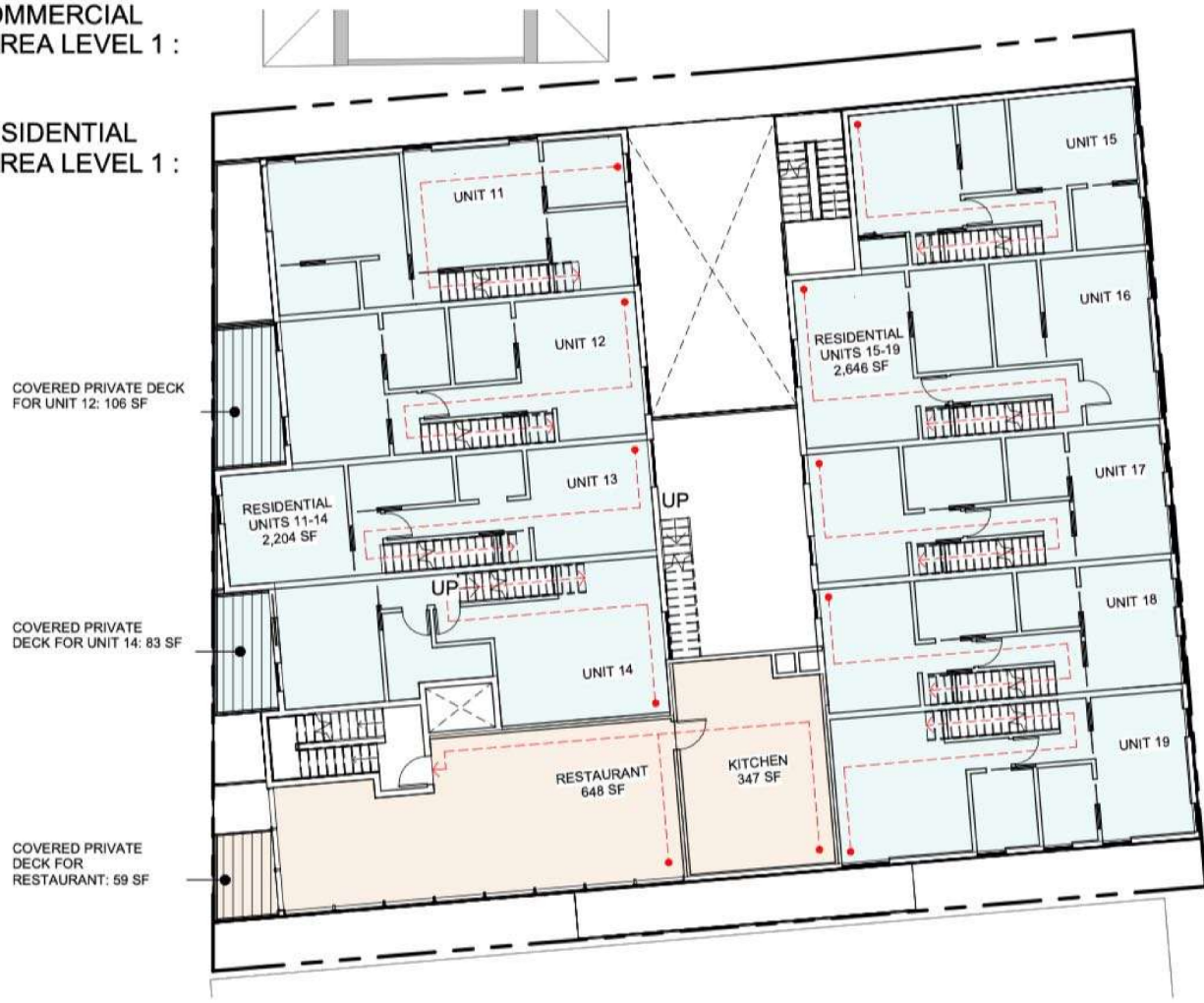
3 LEVEL 2 - AREA PLAN
1/16" = 1'-0"

Third Floor Plan (detailed/color)



TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 1,054 SF

TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,035 SF



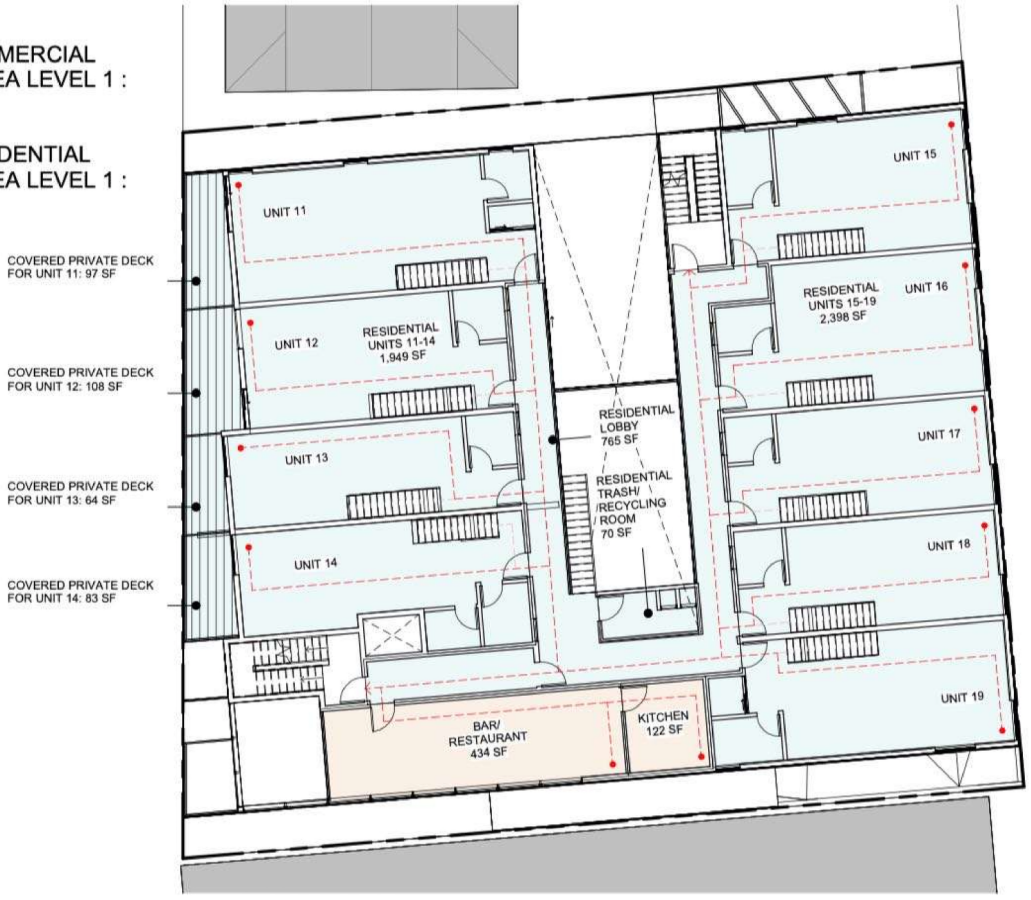
4 LEVEL 3 - AREA PLAN
1/16" = 1'-0"

Fourth Floor Plan (detail/color)



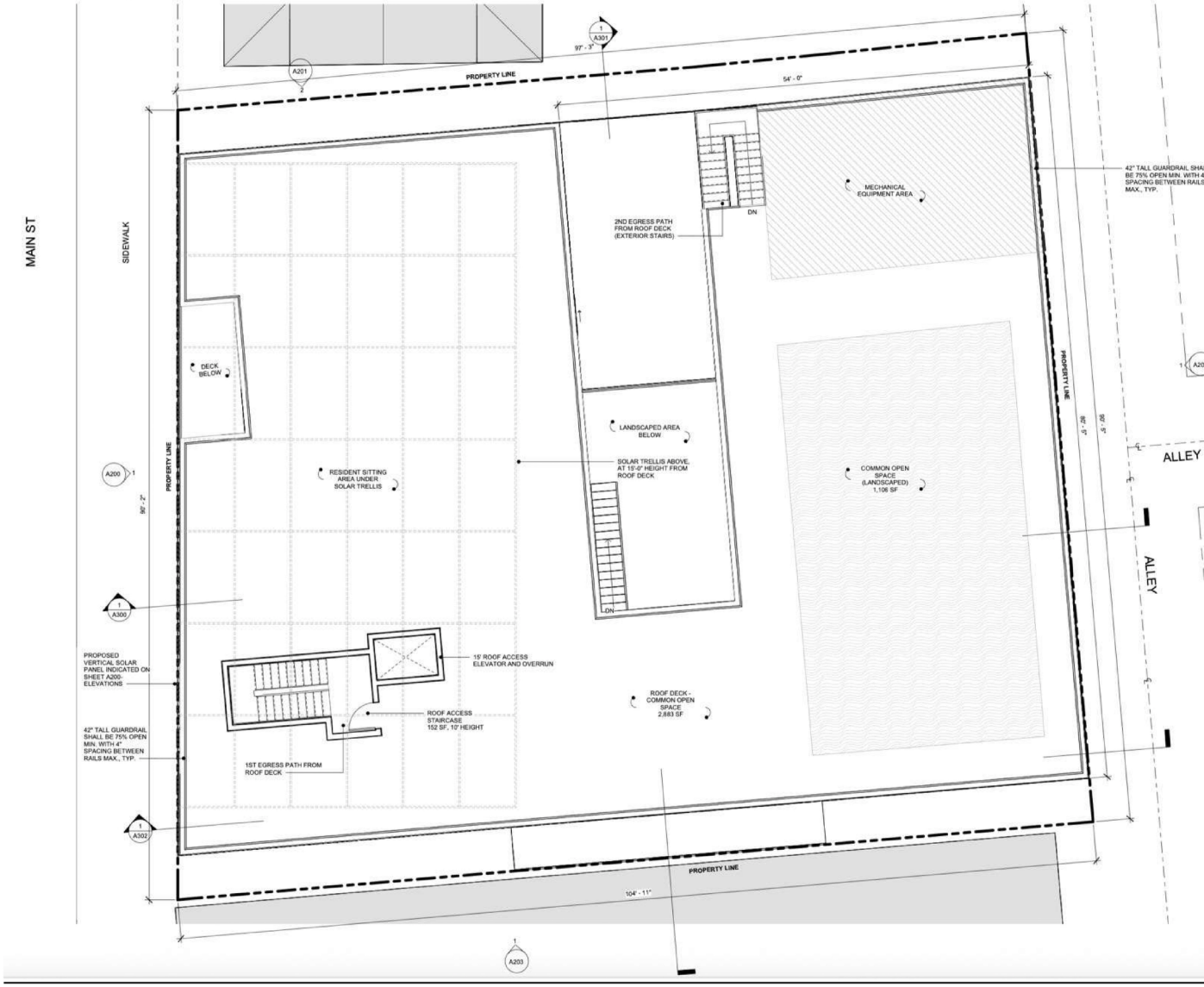
TOTAL COMMERCIAL ZONING AREA LEVEL 1 : 556 SF

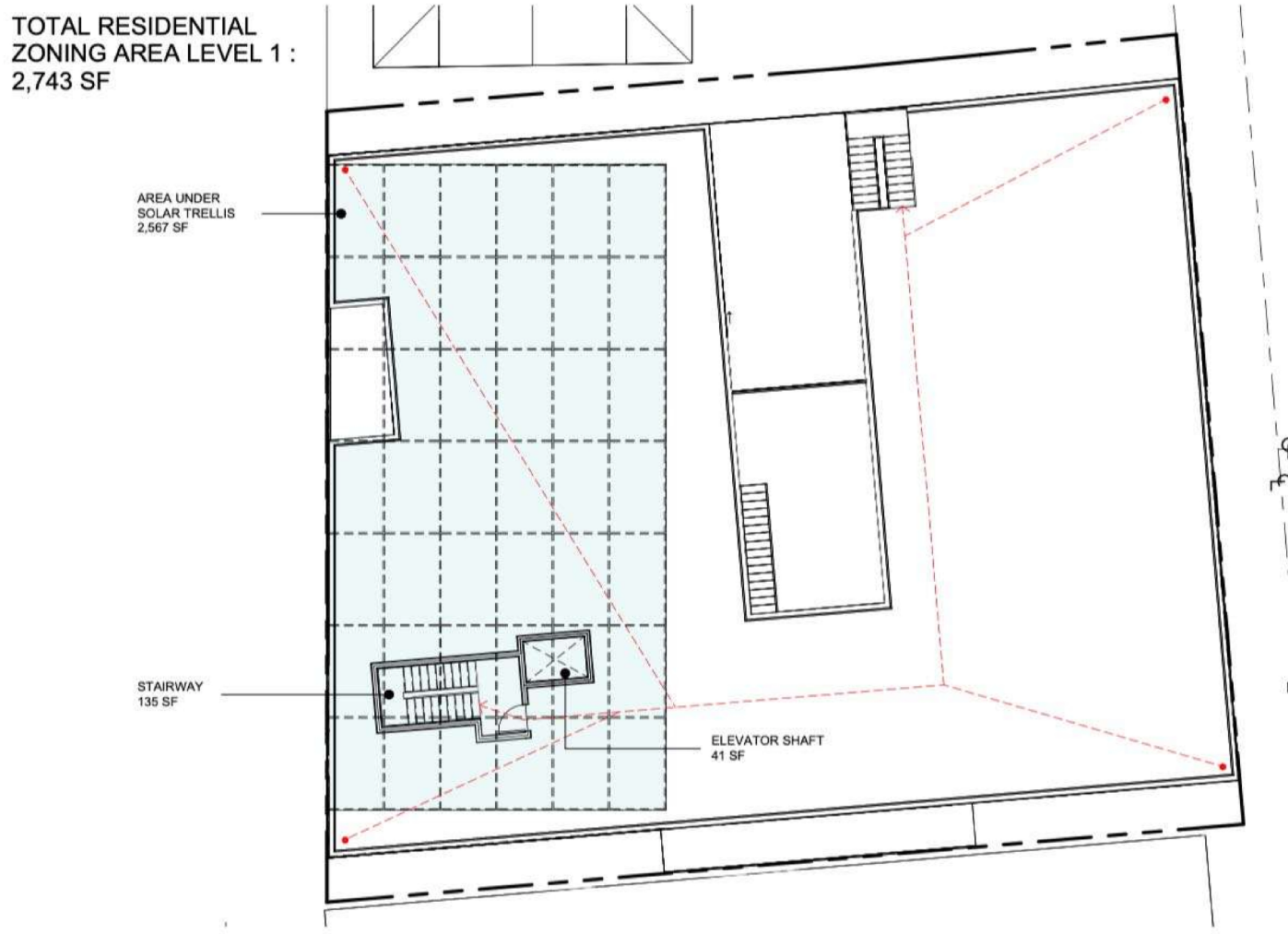
TOTAL RESIDENTIAL ZONING AREA LEVEL 1 : 5,463 SF



5 LEVEL 4 - AREA PLAN
1/16" = 1'-0"

Roof Plan (detail/color)

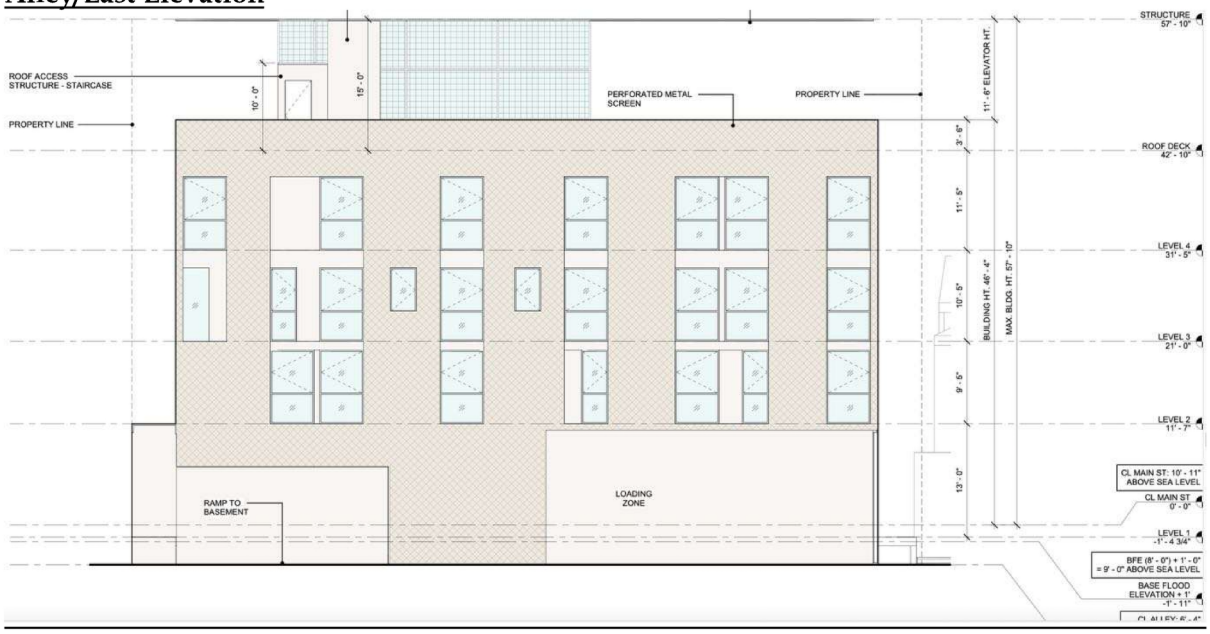




6 ROOF DECK - AREA PLAN
1/16" = 1'-0"

V. Elevations:

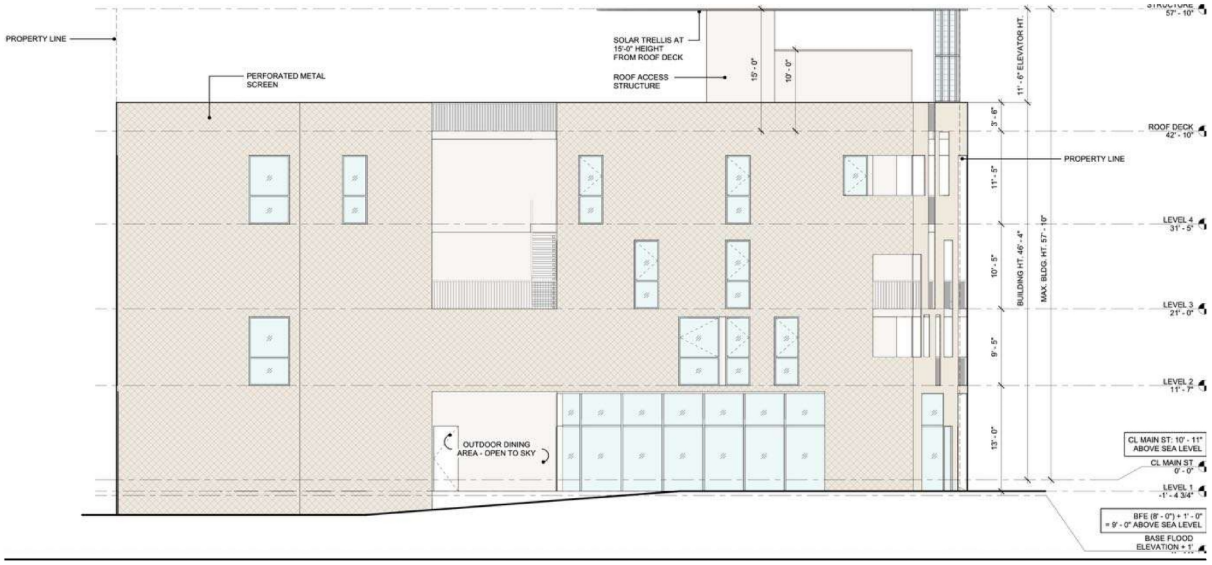
Alley/East Elevation



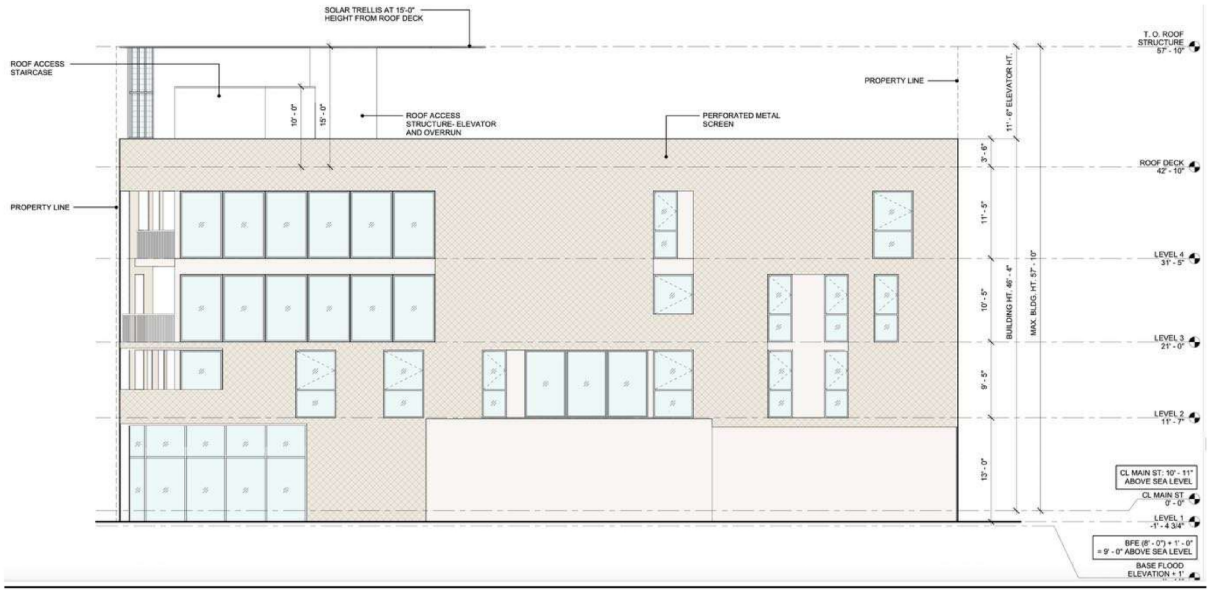
Frontage on Main Street/West Elevation



North Elevation



South Elevation



ATTACHMENT I

CALIFORNIA WOMEN'S LAW CENTER

Venskus & Associates
A PROFESSIONAL LAW CORPORATION

May 4, 2021

CPC-2019-7393-CA
ENV-2019-7394-ND

Re: Mello Act Ordinance must not allow demolitions/conversion of residential structures for purposes of mixed-use projects

Dear Los Angeles City Planning Commissioners:

The California Women's Law Center ("CWLC") is a non-profit law and policy center whose mission is to create a more just and equitable society by breaking down barriers and advancing the potential of women and girls through transformative litigation, policy advocacy and education. We focus on addressing economic justice, gender discrimination, violence against women, and women's health.

Venskus & Associates, APC is a boutique law firm litigating in the areas of housing rights and environmental/land use. The law firm represents and advocates for traditionally under-represented plaintiffs, such as low-income tenants, community organizations and environmental groups.

We write to urge the Los Angeles City Planning Commission ("Planning Commission") to ensure that its proposed Mello Act Ordinance (CPC-2019-7393-CA) does not:

- exceed the City's jurisdiction by conflicting with, or changing the meaning of, state law;
- run afoul of the Settlement Agreement Concerning Implementation of the Mello Act in the Coastal Zones within the City of Los Angeles ("Settlement Agreement");
- establish a law that is weaker than the City of Los Angeles' ("City") Mello Act Interim Administrative Procedures ("IAP").

The Settlement Agreement provided that the City must adopt Interim and Permanent Ordinances to implement both the Mello Act and the provisions of the Agreement. In response, the City adopted the IAP in 2000. In 2015, the City Council requested that City Planning prepare a permanent ordinance, but one was not adopted at that time. In April 2019, the City Council directed the Planning and Housing Departments to prepare and present a permanent ordinance to implement the Mello Act. In December 2019, the City's proposed Mello Act Ordinance was released. On February 25, 2021, the Planning Commission reviewed the proposed ordinance, but the vote was continued to May 13, 2021.

Adopting a permanent ordinance is an important step to protect housing stock including, specifically, affordable and Rent Stabilized (RSO) housing in the City's coastal zones, and to prevent displacement of people and communities. The ordinance must be in accordance with controlling state law and the Settlement Agreement. As currently proposed, the Mello Act Ordinance is not in accordance with controlling authority and thus exceeds the City's jurisdiction.

I. The purpose of the Mello Act is to preserve residential structures in the coastal zone, to protect existing affordable housing, and to provide new affordable housing

As stated in the IAP, under the Mello Act each local jurisdiction shall enforce three basic rules—

1. maintain existing residential structures,
2. replace converted or demolished affordable units
3. provide inclusionary residential units in new housing developments.

However, by adding clause 12.21.H.c.7. Mixed Use in the draft Mello Act Ordinance, the City is not honoring the first requirement, which states:

> "Existing residential structures shall be maintained, unless the local jurisdiction finds that residential uses are no longer feasible." (IAP pg. 7.)

California courts also have made clear that the Mello Act's purpose is to preserve housing in the Coastal Zone. The Court of Appeal stated that the purpose of the Mello Act is:

> "to preserve residential units occupied by low or moderate-income persons or families in the coastal zone."[1]

The California Supreme Court similarly explained that:

> "[t]he Mello Act supplements the housing elements law, establishing minimum requirements for housing within the coastal zone for persons and families of low or moderate income."[2]

In fact, the Mello Act specifically mentions the housing elements state law, making it clear that the Mello Act is a law that protects housing for all income levels and certainly not one that would allow for non-residential uses. One of the main avenues the Mello Act proscribes for protecting residential housing is to limit the ability to convert existing residential structures to non-residential uses. To allow such conversions would not only violate both the letter and the spirit of the Mello Act, but it would plainly threaten housing, by allowing its destruction for purposes of a more lucrative commercial use, including mixed use projects, thus displacing families and damaging coastal communities that are already holding on by a thread—exactly what the Mello Act was intended to prevent.

[1] *Venice Town Council v. City of L.A.*, 47 Cal. App. 4th 1547, 1552-53 (1996).
[2] *Pacific Palisades Bowl Mobile Estates, LLC v. City of Los Angeles*, 55 Cal. 4th 783, 798 (2012) (emphasis added).

The Mello Act states:

> "The conversion or demolition of any **residential structure** for purposes of a nonresidential use which is not 'coastal dependent,' as defined in Section 30101 of the Public Resources Code, shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location."

This language is repeated in IAP section 4.1 (also covered in the Settlement Agreement, section VI.C.1.):

> "The Mello Act states that the Demolition or Conversion of **residential structures** for the purposes of a non-Coastal-Dependent, non-residential use is prohibited, unless the local jurisdiction first finds that a residential use is no longer feasible at that location."

II. As proposed, the draft Mello Act Ordinance exceeds the City's jurisdiction and violates the Settlement Agreement

The draft Mello Act Ordinance exceeds the City's jurisdiction. Under article XI, section 7 of the California Constitution, "[a] county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws."[3] The Mello Act is a state statute; therefore, any attempt to enact an ordinance in conflict with it is in excess of the City's authority.

The City must also comply with the Settlement Agreement in enacting the Mello Act Ordinance. The permanent ordinance must be consistent with both the Mello Act and the provisions of the Settlement Agreement. Adopting an ordinance that is contrary to the provisions of the Settlement Agreement would be in violation of the Settlement Agreement itself.

III. Words have meaning: terminology in land use law is specific

The draft Mello Act Ordinance new proposed provision (LAMC 12.21H.c.7.) for conversion to mixed uses changes the meaning and application of the Mello Act by stating:

> "Mixed Use Development. A proposed mixed use development may not result in a net reduction in the total number of existing Residential Units unless a residential use is no longer feasible. A mix of uses is permitted, so long as the structure provides all required Replacement Affordable and Inclusionary Units."

This new provision would allow for the conversion of one hundred percent residential structures to non-residential mixed uses and by doing so, change the meaning, spirit, and purpose of the Mello Act. This change is in direct violation of the Mello Act and the Settlement Agreement, which explicitly forbid the conversion of a residential structure to a non-residential use.

[3] *Sherwin-Williams Co. v. City of L.A.*, 4 Cal. 4th 893, 897 (1993).

This new conversion provision included in the draft Mello Act Ordinance essentially changes the Mello Act, as follows:

> "Conversion or demolition of any ~~Residential Structure~~ **residential unit or residential use**, for purposes of a non-residential use that is not Coastal-Dependent, is prohibited, unless a residential use is no longer feasible at that location."

This new provision has the effect of replacing the word "structure," as used in the Mello Act, the Settlement Agreement and IAP, with "unit or use." The words "structure" and "unit" are not interchangeable. Nor are the words "unit" and "use." The word "structure" refers to an entire building as an entity, while the word "unit" refers to an individual dwelling, which may be one of many within a single structure. This is an important distinction, because the use of the word "structure" in both the Mello Act and the IAP intentionally protects the entire residential building.

The terminology used in land use law is specific and purposeful. The use of "unit" in the Mello Act pertains to sections of the law related to protecting existing affordable housing or providing inclusionary affordable housing, whereas "structure" relates to the protection of housing from the desires of developers for more lucrative commercial uses, including mixed use.

A residential structure in a commercial zone may also not be changed to a mixed use, as the Mello Act specifically protects housing regardless of zoning. Furthermore, the definition of a "residential structure" does not include "mixed use," which is considered a commercial use and is restricted to commercial zones. A "residential structure," on the other hand, is permitted in both residential and commercial zones. They are far from equivalent. Therefore, the substitution of "unit or use" in the proposed ordinance amounts to a sleight of hand, *apparently to promote the substitution of mixed use structures in place of residential structures*. This was clearly not the intent of the clear and carefully chosen language of the Mello Act, the Settlement Agreement and the IAP.

Municipalities are permitted to strengthen the local implementation of a statute, but not to weaken it. As per the Mello Act, Government Code Section 65590(k):

> …[t]his section establishes minimum requirements for housing within the coastal zone for persons and families of low or moderate income. It is not intended and shall not be construed as a limitation or constraint on the authority or ability of a local government, as may otherwise be provided by law, to require or provide low- or moderate-income housing within the coastal zone which is in addition to the requirements of this section.

The present use of the term, "residential structure" protects an entire building, whereas "residential unit or use" does not, necessarily. It would therefore weaken the implementation of the statute and is thus beyond the jurisdiction of the City.

IV. Conversion to mixed use is used as loophole to allow unpermitted conversions to commercial uses

The result of the change in terminology will destroy housing by allowing for conversion to commercial uses. Replacing the word "structure" with the words "unit" or "use" is beyond the jurisdiction of the City because it contradicts the Mello Act, a state law.

The City's Mello Act Ordinance must also comply with the Mello Act's intent. Since this new mixed use provision would effectively change the meaning, in direct contradiction to the Act's intent, the City would be acting in excess of its jurisdiction.

The harm from the City's attempt to exceed its jurisdiction by allowing conversion or demolition of residential structures for purposes of non-residential use is not just theoretical. Several recent projects have already seized on the current, draft language of the proposed Mello Act Ordinance, regarding "residential units" or "residential uses," to justify approval of the conversion of residential properties to mixed-use properties. Many of these properties have then illegally converted the entire structure to commercial, non-residential use, with no consequence.

Thus, already the use of "units or uses" rather than "structures" has created a loophole to allow developers to convert one hundred percent residential use structures to "mixed use" and then fail to actually maintain any residential uses, in violation of state law and the Settlement Agreement.

A. Example #1: 1214 Abbot Kinney Blvd.

First, for the property at 1214 Abbot Kinney Blvd., in 2014, the City approved a change of use from residential to mixed use, in violation of the Mello Act. Since then the property has been used illegally as commercial office use, even though it was only approved for conversion to "mixed use." Yet another example of ongoing use of residential structures for commercial use is 619-701 Ocean Front Walk, aka Thornton Lofts. When the tech industry moved in they took over residential structures for offices. There are numerous other similar examples of unpermitted mixed uses or full commercial uses where the structures are only permitted for residential use.

B. Examples #2 & #3: 811-815 Ocean Front Walk, and 1310 Abbot Kinney Blvd.

Other Coastal Zone projects are pending that would violate the Mello Act by allowing demolition of 100% residential structures for purposes of a mixed-use development. One example is the project at 811-815 Ocean Front Walk, which proposes the demolition of three residential structures for purposes of a mixed-use commercial development. Another example is the project proposed at 1301-1303 Abbot Kinney, which is requesting a change of use from a 100% residential triplex structure to two live/work mixed use units. The approvals of both of these projects have been appealed. If these projects are ultimately approved by the City it will be in clear violation of the state Mello Act and the Settlement Agreement. There are other examples where the City approved a residential structure to be replaced by "artist in residence" use, a mixed use, but they do not meet the code's definition of artist and thus the structures have become essentially all commercial use.

C. Example #4: 1047 Abbot Kinney Blvd.

One final example is the three bungalows at 1047 Abbot Kinney Blvd., which have certificates of occupancy as residential units but have for years been illegally used for a non-residential use. The City recently approved the demolition of those bungalows for purposes of the Venice Place mixed use project, for which they will be covered by the hotel's CUB, and they will be included in the hotel buildings, very likely losing their identity as housing.

These examples illustrate that because the as-now-proposed Mello Act Ordinance provisions regarding conversion to mixed use contradict the Mello Act's language and intent to protect housing, developers have exploited, are currently exploiting, and will likely continue to exploit this "mixed-use" loophole to effectively destroy residential housing, including and especially affordable housing for low-income residents and communities of color, thus causing a gross, unacceptable, adverse cumulative impact on housing, including affordable housing, in the Los Angeles Coastal Zones.

All of this is an unfortunate, perhaps unconscious, continuance of the City's practices of institutional racism.[4]

V. If not amended, the draft Mello Act Ordinance will disproportionately harm low income communities of color in the Coastal Zone as new mixed use development will be encouraged

The impact of the destruction of housing that has and will continue to result from the Mello Act Ordinance if the ability to convert residential structures to mixed uses is not eliminated, disproportionately harms communities of color. In 2017, California had nearly two million rent burdened households of color that spent more than thirty-percent of the household income on rent and utilities.[5] There were also 1.6 million extremely low-income renter households, two-thirds of which were households of color.[6] During the COVID-19 pandemic, there has been a disproportionate financial impact on populations of color, which has created even greater disparities.[7] All housing will be put in jeopardy in the Coastal Zone if the draft Mello Act Ordinance is not amended to prohibit demolition or conversion of residential structures for purposes of mixed use developments, and those who will be impacted most are low-income people and communities of color.

This is especially true because by allowing such mixed use developments to replace residential structures the current draft of the Ordinance actually encourages, rather than discourages,

---

[4] On top of these egregious practices, the City has a pattern and practice of using the rent paid by existing unpermitted commercial uses (this was done for 1301-1303 Abbot Kinney and 1047 Abbot Kinney, among many others) to determine whether affordable housing must be replaced, a a gross double violation of the Mello Act and a practice that the City must never allow, and yet it openly does allow it.

[5] AMEE CHEW & CHIONE LUCINA MUÑOZ FLEGAL, POLICY LINK, FACING HISTORY, UPROOTING INEQUALITY: A PATH TO HOUSING JUSTICE IN CALIFORNIA 14 (2020), https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf.

[6] *Id.*

[7] *See* Kelly Anne Smith, *Covid and Race: Households of Color Suffer Most From Pandemic's Financial Consequences Despite Trillions in Aid*, FORBES (Sept. 17, 2020), https://www.forbes.com/advisor/personal-finance/covid-and-race-households-of-color-suffer-biggest-pandemic-consequences/.

displacement. With the "mixed use" loophole, developers are encouraged to demolish the building and erect a new building in its place, thus displacing families currently living in older housing stock which is always, by definition, more affordable than new units deemed "affordable" pursuant to federal and state law. It makes no sense for the City to encourage destruction of existing housing, including affordable housing, so that more lucrative commercial mixed use projects can be built in the Coastal Zone, especially when such a concept runs completely contrary to the Mello Act's intent. This would be a boon to developers and would cause a steady stream of property owners getting richer on the backs of our existing renters in the L.A. Coastal Zones as they will be displaced when mixed use projects replace residential structures.

VI. Conclusion

We understand that the City's priority is to increase housing, but it must be done within the confines of the law and not by allowing conversions of residential structures to mixed use, in violation of the Mello Act.

We too support mixed use developments, but only where they replace existing commercial uses and thus add housing.

The Mello Act's purpose is to protect all housing in the Coastal Zone, as well as to protect existing and provide for new affordable housing.

For the foregoing reasons, we respectfully urge you to eliminate any and all proposed Mello Act Ordinance language that would allow for demolition or conversion of residential structures for purposes of non-residential/commercial mixed use projects, in order to comply with state law and the Settlement Agreement and to ensure the City is acting within its jurisdiction.

Sincerely,

Amy Poyer
Senior Staff Attorney

California Women's Law Center
360 N. Pacific Coast Hwy, Suite 2070
El Segundo, CA 90245
amy.poyer@cwlc.org

Sabrina Venskus
Partner

Venskus & Associates, A.P.C.
1055 Wilshire Blvd., Suit 1996
Los Angeles, CA 90017
venskus@lawsv.com