APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: $229

Reviewed & Accepted by (DSC Planner): Ruben Vasquez

Case No.: CPC-2024-2010-GPA-ZC-SPPC-CU3 **Date:** 5/27/2026

☐ Determination authority notified ☐ Receipt Number: 200620352090

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-2024-2010-GPA-ZC-CU-SPP

APN: 4225-010-901,4225-008-904,4225-008-904

Project Address: 128 Hurricane,3813 Esplanade,133 Hurricane

Final Date to Appeal: May 27 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: Kenya Lee

Company/Organization: _____

Mailing Address: 3809-3811 Esplanade

City: Marina Del Rey **State:** CA **Zip Code:** 90292

Telephone: 313-999-0264 **E-mail:** kenyalee.kl@gmail.com

Is the appeal being filed on 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: Kenya Lee **Date:** May 26, 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

☐ *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 appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

☐ Proof of payment or mailing must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant.

SPECIFIC CASE TYPES

ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITIES (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.

ADMINISTRATIVE APPEAL

LOS ANGELES CITY COUNCIL AND RELATED REVIEWING AGENCIES

In the Matter of:

VENICE AUXILIARY PUMPING PLANT ("VAPP")

Case No. CPC-2024-2010-GPA-ZC-CU-SPP, CEQA:SCH No.2015111038 VAPP,EIR Project

Concerning the Proposed:

- General Plan Amendment
- Zone Change
- Conditional Use Permit
- Venice Land Use Plan Amendment
- Related Environmental Determinations

APPELLANT:

Kenya Lee

Adjacent Resident, Aggrieved Party, and Community Stakeholder

On behalf of affected surrounding residents and stakeholders

Submitted To:

- Los Angeles City Council
- Los Angeles Department of City Planning
- All Relevant Reviewing Agencies

Date Submitted: May 26,2026

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I. INTRODUCTION

TO THE LOS ANGELES CITY COUNCIL, AND ALL RELEVANT REVIEWING AGENCIES:

Appellant Kenya Lee hereby appeals the May 7, 2026 determination of the Los Angeles City Planning Commission ("CPC") concerning the proposed Venice Auxiliary Pumping Plant ("VAPP") project located adjacent to residential properties near Hurricane Street, Esplanade West, and the Ballona Lagoon in Venice, California.

As an immediately adjacent resident directly impacted by the proposed project, Appellant respectfully submits that the CPC failed to impose adequate, enforceable, and site-specific

conditions necessary to protect neighboring residential properties, public health, environmental safety, residential habitability, quiet enjoyment, and environmentally sensitive coastal resources.

The project approval improperly prioritizes regional infrastructure objectives while minimizing or disregarding the extraordinary burdens imposed upon residents located immediately adjacent to the proposed industrial-scale wastewater infrastructure facility.

The proposed amendment to the certified Venice Land Use Plan and associated zoning modifications further constitute an impermissible form of spot zoning inconsistent with established California land use law principles and the broader public purposes underlying the Venice Coastal planning framework.

This appeal further asserts that the requested land use amendments and zoning modifications constitute a legally deficient and incompatible transformation of certified residential coastal land use into public utility infrastructure without sufficient environmental review, enforceable mitigation, or lawful compatibility findings.

II. STATEMENT OF FINDINGS PRESENTED

Whether the CPC improperly approved land use amendments constituting unlawful spot zoning and whether the requested redesignation constitutes an unlawful departure from the certified Venice Land Use Plan and established Coastal Act protections;

V. FAILURE TO PROVIDE ADEQUATE RESIDENTIAL BUFFERING AND LAND USE COMPATIBILITY

VI. FAILURE TO IMPOSE ENFORCEABLE CONSTRUCTION DAMAGE PROTECTIONS

VII. FAILURE TO PROTECT RESIDENTIAL HABITABILITY AND QUIET ENJOYMENT

VIII. INADEQUATE METHANE AND ENVIRONMENTAL SAFETY PROTECTIONS

IX. INADEQUATE EMERGENCY RESPONSE AND RELOCATION PROTECTIONS

X. IMPROPER SPOT ZONING AND UNLAWFUL LAND USE RECLASSIFICATION

XI. INCONSISTENCY WITH THE CERTIFIED VENICE LAND USE PLAN AND COASTAL POLICIES

XII. DISPROPORTIONATE INFRASTRUCTURE SCALE AND RESIDENTIAL IMPACTS

III. FACTUAL BACKGROUND

The VAPP project proposes the redevelopment and expansion of wastewater infrastructure facilities adjacent to residential properties located near Hurricane Street and Esplanade West within the Venice dual permit jurisdiction coastal zone area.

The proposed project includes requests for:

- General Plan Amendments;
- Zone Changes;
- Venice Certified Land Use Plan Amendments;
- Conditional Use approvals;
- Construction staging areas;
- Utility infrastructure expansion;
- Parking-related modifications; and
- Related environmental determinations.

The proposed approvals would convert long-standing residentially designated land into Public Facility use immediately adjacent to occupied residential homes.

Throughout the entitlement and environmental review process, adjacent residents and community stakeholders repeatedly raised substantial concerns regarding:

- Residential compatibility;
- Construction vibration;
- Noise impacts;
- Methane risks;
- Emergency access;
- Environmental justice concerns;
- Residential buffering deficiencies;
- Structural integrity impacts;
- Coastal consistency concerns;
- ESHA impacts;
- Parking displacement;
- Construction scheduling;
- Property protections; and
- Long-term operational impacts.

The administrative record reflects repeated requests by community members for meaningful mitigation measures, enforceable protections, redesign alternatives, and good-faith engagement.

Despite these concerns, the CPC approved the requested entitlements while deferring multiple critical protections to future studies, consultant recommendations, discretionary implementation, non-specific mitigation measures, and unenforceable future determinations.

IV. INCORPORATION OF PRIOR SUBMISSIONS

Appellant hereby incorporates by reference all prior correspondence, objections, expert submissions, attorney communications, hearing testimony, public comments, environmental objections, mitigation requests, and supporting materials previously submitted regarding the VAPP project by the undersigned, legal counsel, adjacent residents, community stakeholders, and participating organizations.

All attached exhibits and referenced submissions are incorporated herein as though fully set forth in this appeal.

V. FAILURE TO PROVIDE ADEQUATE RESIDENTIAL BUFFERING AND LAND USE COMPATIBILITY

The approved project converts residentially designated land into Public Facility zoning immediately adjacent to occupied residential homes without requiring meaningful physical separation, transition protections, or buffering mechanisms.

Although the City repeatedly characterizes the facility as critical emergency wastewater infrastructure, the approval imposes no mandatory:

- sound attenuation wall;
- vibration isolation system;
- landscaped screening barrier;
- residential transition zone;
- expanded setbacks;
- visual shielding;
- indoor air filtration protections;
- construction exclusion buffer; or
- enforceable operational separation measures; and
- off-site work accommodations for residents directly impacted by construction activities.

The absence of meaningful buffering between industrial wastewater infrastructure and immediately adjacent residential occupancy is fundamentally inconsistent with the intent, protections, and neighborhood preservation principles embedded within the certified Venice Land Use Plan, Venice Coastal policies, and accepted compatible land use planning standards.

The administrative record itself contradicts the City's compatibility findings.

The Venice Neighborhood Council specifically identified the failure to require meaningful residential buffering protections and acknowledged that the mitigation standards imposed were more appropriate for highway-adjacent infrastructure than residential neighborhoods, including:

"Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines."

The record further acknowledges that the standards applied to the project are more appropriate for highway-adjacent infrastructure than residential streets.

The City's unsupported finding that the project is "compatible with adjacent land uses" is contradicted by the project's direct adjacency to occupied residences without meaningful separation protections.

VI. FAILURE TO IMPOSE ENFORCEABLE CONSTRUCTION DAMAGE PROTECTIONS

Condition No. 19 merely states:

19. The applicant shall provide an allowance for mitigation of inadvertent damage caused during construction.

This condition is impermissibly vague, legally deficient, and unenforceable.

Per the attached CPC transcript: Sean Silva from CD11 stated:

"Ms. Lee… property's proximity to the project brings about unique potential ramifications."

The CPC failed to establish:

- what constitutes compensable damage;
- mandatory reimbursement timelines;
- independent evaluation procedures;

- habitability protections;
- loss-of-use protections;
- relocation rights;
- structural crack thresholds;
- foundation displacement standards; or
- legally binding compensation mechanisms.

Per the attached CPC hearing transcript: Statements from: LA Sanitation representative Christine Heinrich-Josties stated during the CPC hearing:

"if some more substantial damage were to occur… that's something that we could consider.

AND:

"there isn't a specific amount now"

AND:

"I'm not sure if it's mandatory that we establish this allowance."

The project includes substantial grading, excavation, soil export, pile-driving activity, vibration-producing construction, and prolonged heavy equipment operations immediately adjacent to occupied residences.

Sited in the **EIR** the administrative record expressly acknowledges "ground-borne vibration which could result in residential building damage."

Despite these acknowledged impacts, the CPC failed to require:

- pre-construction structural surveys;
- real-time vibration monitoring;
- independent engineering inspections;
- automatic work stoppage thresholds;
- foundation monitoring systems;
- third-party structural review; or
- mandatory repair obligations enforceable by affected residents.

Per the CPC hearing transcript: Commission President Lawshe stated:

"I would probably like to add a requirement that there be a mandatory fund for mitigation for the neighborhood."

The transcript further reflects admissions by project representatives that:

- no mandatory compensation fund had been finalized;
- no specific compensation amount had been established; and

- structural protections remained discretionary.

These omissions expose adjacent residents to substantial risk of structural damage, interference with residential occupancy, economic harm, and loss of use without meaningful or enforceable recourse.

VII. FAILURE TO PROTECT RESIDENTIAL HABITABILITY AND QUIET ENJOYMENT

The findings repeatedly emphasize regional wastewater operations and citywide infrastructure benefits while failing to adequately analyze direct impacts upon surrounding and immediately adjacent and surrounding residential occupants.

The approval fails to adequately address:

- sleep disturbance;
- chronic construction noise;
- vibration impacts;
- emotional distress;
- child safety concerns;
- residential habitability;
- diminished quiet enjoyment;
- loss of outdoor residential use;
- property devaluation;
- long-term industrial adjacency impacts; and
- off-site work accommodations for directly impacted neighboring residents.

The administrative record (EIR report) acknowledges "construction noise that exceeds LA CEQA Thresholds guidelines."

The project's extraordinary proximity to occupied residences creates foreseeable nuisance conditions under California Civil Code §3479 and raises substantial concerns regarding inverse condemnation, interference with residential quiet enjoyment, and impairment of residential habitability rights.

VIII. INADEQUATE METHANE AND ENVIRONMENTAL SAFETY PROTECTIONS

Condition No. 17 in the CPC report conditions merely references informational reporting concerning methane monitoring levels associated with the project site.

17. The project shall provide an informational webpage for the benefit of the neighbors and community members. The information webpage shall include, but not limited to, reporting on weekly methane levels, emergency response plan and street closures.

This condition is wholly inadequate for a project involving excavation activities, underground utility infrastructure, contaminated soils, methane exposure concerns, and work adjacent to a formerly active oil field environment.

The CPC failed to require:

- continuous methane monitoring;
- independent air quality oversight;
- residential indoor air testing;
- emergency exposure thresholds;
- evacuation procedures;
- direct resident notification systems;
- enforceable public health response protocols; or
- mandatory independent environmental review.

The administrative record expressly references "potentially significant methane gas release" concerns.

During the hearing process, community members specifically requested:

- 24-hour active methane monitoring;
- public transparency;
- website-accessible monitoring data; and
- automatic shutdown protocols.

As reflected in the CPC hearing transcript, Commissioner Saitman specifically asked:

"What is the emergency response plan for mitigating measures for neighbors who might be impacted by methane?"

The response from LA Sanitation Project Lead Christine Heinrich Josties:

"There will have to be one."

Nevertheless, project representatives acknowledged that only passive methane systems were being considered because stronger systems were "not required."

The hearing transcript further reflects that: per Christine Josites, LA Sanitation Project Lead

- no finalized methane monitoring cost existed;
- no guaranteed active monitoring system existed; and
- future consultants "might not recommend anything."

Per the CPC hearing transcript Speaker 10 - Commissioner Phyllis Klein

- ***Yes, Commissioner Klein, for the record. I wanted to commend Steve Bradbury and the Hurricane Street community for their for their letter, and I wanted staff to address some of their suggestions, which to me seem infinitely reasonable to occur, some of which you have mentioned. But I wanted to know what would be the cost of an ongoing methane detection system at the property? I know that it doesn't exist, but we're due for some seismic event, and I would prefer that there not be a circumstance where this becomes an emergency. So what would be the cost and why can't that be provided?***

- ***01:03:19 Speaker 3 – Christine Heinrich-Josties LA Sanitation Project Lead***
- ***So regarding the cost, I don't have a hard number for that. Unfortunately, I don't even have a ballpark number. So that's something I need to, you know, get information on and follow up about. And as I mentioned before, you know, it's going to be the whatever mitigations we do and act will be dependent on what the environmental consultant finds upon the soil exploration. So if they find, no detectable methane in those areas, they might not recommend anything. But if they find detectable methane that exceeds a certain level, that could be a cause of concern, then they might recommend, you know, monitoring or more widespread monitoring, and we would enact that. But unfortunately, I have no cost impact. So, you know, the only thing I can reiterate as the applicant is that we're going to enact what we need to based on the results of that environmental.***

Weekly informational reporting does not constitute meaningful environmental protection for residents living immediately adjacent to excavation and infrastructure activities within a sensitive coastal residential area.

IX. INADEQUATE EMERGENCY RESPONSE AND RELOCATION PROTECTIONS

Condition No. 18 merely requires preparation of an emergency response plan without establishing mandatory implementation standards, resident notification obligations, or enforceable relocation protections.

18. The applicant shall provide an emergency response plan and provide such plan to property owners and occupants within 100 feet of the subject site (excluding public rights-of-way).

The condition fails to establish:

- mandatory temporary relocation rights;
- emergency housing accommodations;
- sewage spill response obligations;
- relocation compensation standards;
- indoor contamination response protocols;
- medically vulnerable resident protections;
- child safety procedures;
- emergency evacuation assistance; or
- enforceable residential protection measures.

The administrative record identifies concerns regarding inadequate emergency access during construction activities.

Further, the hearing transcript reflects that when commissioners requested clarification regarding emergency response protocols, project representatives responded only that "there will have to be one," confirming that no finalized emergency response system had yet been established.

Per the CPC hearing transcript: Commission President Lawshe stated:

"I would probably like to add a requirement that there be a mandatory fund for mitigation for the neighborhood."

Given the project's acknowledged wastewater, excavation, and infrastructure risks, these omissions are unreasonable, inadequate, and inconsistent with public safety obligations owed to immediately adjacent residential occupants.

X. IMPROPER SPOT ZONING AND UNLAWFUL LAND USE RECLASSIFICATION

The proposed amendment to the certified Venice Land Use Plan and associated zoning modifications constitute an impermissible form of spot zoning inconsistent with established California land use law principles, the broader public purposes underlying the Venice Coastal zone planning framework, and core Coastal Act consistency requirements.

The subject parcels have long existed within a residential land use designation intended to preserve neighborhood-serving residential character within the Coastal Zone.

The City now seeks to isolate and redesignate these parcels solely to accommodate a high-intensity public utility use fundamentally inconsistent with the surrounding residential context.

This selective redesignation benefits a singular infrastructure objective at the direct expense of adjacent residential occupants and established community planning protections.

California courts have consistently recognized that spot zoning occurs where:

- a small parcel is singled out for treatment inconsistent with surrounding uses;
- the rezoning conflicts with the broader planning framework; and
- the action primarily benefits a specific project or use rather than coherent community-wide planning objectives.

The Venice Neighborhood Council formally opposed the requested General Plan Amendment and Zone Change unless substantial compatibility and mitigation concerns were materially addressed.

Here, the requested redesignation undermines the integrity of the certified Venice Land Use Plan by converting residentially planned coastal land into industrial-scale wastewater infrastructure absent meaningful compatibility protections or comprehensive neighborhood planning analysis.

The City's attempt to redefine residentially designated coastal land for utility infrastructure purposes immediately adjacent to occupied homes constitutes arbitrary parcel-specific rezoning inconsistent with accepted land use planning principles.

XI. INCONSISTENCY WITH THE CERTIFIED VENICE LAND USE PLAN AND COASTAL ACT POLICIES

The project approval fundamentally alters longstanding residential land use protections by redesignating residential land to Public Facility use while weakening previously established coastal and residential compatibility standards.

The CPC specifically amended policies to newly permit public facilities adjacent to the canals, Ballona Lagoon, environmentally sensitive coastal areas, and surrounding residential properties.

However, the City failed to adequately demonstrate:

- the project is compatible with immediate residential occupancy;
- the project protects neighborhood character;
- residential impacts are minimized;
- environmentally sensitive coastal conditions are protected; or
- sufficient mitigation exists for directly affected surrounding adjacent residents.

The administrative record repeatedly references concerns regarding:

- ESHA protections;
- dredging impacts;
- heavy equipment use;
- habitat degradation;
- coastal access constraints; and
- cumulative environmental impacts.

These unresolved concerns directly undermine the City's findings regarding consistency with the certified Venice Land Use Plan and Coastal protections.

XII. DISPROPORTIONATE INFRASTRUCTURE SCALE AND RESIDENTIAL IMPACTS

The proposed VAPP represents an unusually large-scale and intensive infrastructure deployment within immediate residential adjacency compared to similarly situated utility infrastructure throughout Los Angeles.

Unlike many municipal utility facilities that are buffered from residential occupancy through industrial zoning transitions, substantial setbacks, landscaped screening, or separation corridors, the proposed project places expanded wastewater infrastructure directly adjacent to occupied homes within a sensitive coastal residential environment.

Examples of municipal utility and wastewater infrastructure facilities throughout Los Angeles that are commonly separated from residential occupancy through industrial zoning transitions, substantial setbacks, landscaped screening, or infrastructure corridors include:

- The Hyperion Water Reclamation Plant facility in Playa del Rey, which operates within a large-scale industrial utility campus separated from surrounding residential areas through extensive buffering, operational setbacks, and infrastructure corridors.
- The Donald C. Tillman Water Reclamation Plant facility, which is substantially buffered from adjacent residential occupancy through industrial zoning separation, landscaped perimeter treatments, and roadway infrastructure.
- Wastewater and sanitation infrastructure facilities operated near the Terminal Island Water Reclamation Plant area, where heavy utility uses are generally concentrated within industrialized port and infrastructure zones rather than immediately adjacent to occupied residential homes.
- Pumping and treatment infrastructure associated with the Los Angeles-Glendale Water Reclamation Plant corridor, where utility infrastructure is generally separated from sensitive residential receptors through transitional land uses, setbacks, fencing, and operational buffers.

The disproportionate scale, operational intensity, and construction footprint of the proposed facility materially exceed what residents reasonably expect within a residentially designated coastal neighborhood.

The administrative record reflects repeated community requests for redesign modifications necessary to achieve compatibility with the surrounding residential neighborhood.

1. Triggers for Mitigation Allowance Access

To prevent displacement and economic harm, mitigation funds should be accessible at clearly defined stages, including:
• Upon commencement of **site preparation or subsurface activities**, including grading, excavation, trenching, pile driving, or underground utility installation.
• During construction phases that **materially interfere with safe or practical residential occupancy**, including excessive vibration, sustained noise, restricted access, or safety-related advisories.

2. Defined Economic Impacts

To ensure predictability and fairness:
• Compensable impacts should include **documented loss of rental or household income** resulting from construction-related displacement or loss of use, whether or not physical damage has occurred.
• Income replacement may be calculated based on the **average monthly income from the twelve (12) months preceding construction**.

3. Temporary Rehousing Assistance
Where construction conditions make continued occupancy unsafe or impractical:
• Temporary rehousing should be provided for the duration of such conditions.
• Assistance should include **comparable housing, moving and storage costs, utility reconnection, and a guaranteed right of return**.

Per the CPC transcript: Robin Rudisill stated:

We therefore urge the commission to condition approval on:

"Requiring public works to finally agree to good faith, results-oriented conditions to address the remaining community concerns on residential building protection and health and safety."

But throughout the hearing, the City repeatedly answered concerns with:

- ***future studies,***
- ***future consultants,***
- ***future plans,***
- ***future protocols,***
- ***future coordination***.

The City failed to adequately analyze whether:

- less impactful siting alternatives;
- expanded setbacks;
- alternative facility configurations;
- enhanced buffering; or
- modified operational approaches

could substantially reduce adverse neighborhood impacts.

This failure is particularly significant given the acknowledged environmental sensitivity and residential character of the Venice coastal area.

XIII. INADEQUATE CEQA REVIEW AND FAILURE TO PREPARE SUFFICIENT ENVIRONMENTAL ANALYSIS

The City improperly relies upon prior environmental review documents and addenda while failing to adequately evaluate the current site-specific impacts associated with placing industrial-scale wastewater infrastructure immediately adjacent to occupied residential homes.

The environmental review inadequately analyzes:

- cumulative construction impacts;
- vibration impacts upon adjacent structures;
- long-term operational impacts;
- residential habitability impacts;
- environmental justice concerns;
- displacement pressure;
- cumulative industrialization effects;
- mental health impacts associated with prolonged construction exposure; and
- site-specific impacts to immediately adjacent residential occupants.

The administrative record reflects repeated community concerns that despite numerous meetings and mitigation proposals, "nothing changed" regarding core project impacts and protections.

The City repeatedly deferred critical mitigation obligations to:

- future consultants;
- future studies;
- future plans;
- discretionary implementation;
- future monitoring determinations; and
- undefined protocols.

Such deferred mitigation is inconsistent with CEQA's requirement that mitigation measures be enforceable, specific, measurable, and capable of implementation.

Substantial evidence supports a fair argument that the project may cause significant impacts requiring additional environmental review under CEQA.

XIV. MATERIAL CONTRADICTIONS WITHIN THE ADMINISTRATIVE RECORD

As detailed below the administrative record demonstrates repeated contradictions between:

- community-requested protections;
- acknowledged impacts;
- commissioner concerns;
- project admissions;
- unresolved mitigation deficiencies; and
- the ultimate findings adopted by the CPC.

These contradictions further demonstrate that substantial concerns raised during the public hearing process were acknowledged yet materially minimized within the final project findings and conditions of approval.

A. Methane Monitoring

Community members requested:

- 24-hour active methane monitoring;
- public reporting access;
- emergency thresholds; and
- automatic shutdown protections.

However, project representatives acknowledged that:

- only passive systems were under consideration;
- no finalized active monitoring system existed; and
- stronger protections were not being required.

B. Structural Damage Protections

The Environmental Impact Report acknowledges that vibration impacts could damage residential structures.

Nevertheless:

- no mandatory compensation mechanism was finalized;
- no automatic repair protocol was imposed;
- no enforceable relocation protections existed; and

- compensation discussions remained discretionary.

C. Emergency Planning

Commissioners specifically requested clarification regarding emergency response procedures for neighboring residents.

Project representatives acknowledged only that emergency plans "would have to be" developed, demonstrating that such protections had not yet been finalized despite project advancement.

D. Residential Compatibility

The Venice Neighborhood Council repeatedly requested:

- redesign modifications;
- buffering protections;
- compatibility standards; and
- operational changes.

Despite these requests, the City proceeded with approvals while failing to materially address the majority of community concerns.

E. Environmental Review Deficiencies

The record reflects repeated community concerns that:

- mitigation proposals were ignored;
- environmental risks were minimized;
- residential impacts were inadequately analyzed; and
- community engagement failed to materially alter the project.

These contradictions undermine the adequacy of the CPC's findings and further demonstrate unresolved deficiencies within the approval process.

XV. REQUESTED RELIEF

Accordingly, Appellant respectfully requests that the City Council:

1. Reverse the approval of the Conditional Use Permit, General Plan Amendment, Zone Change, Venice Land Use Plan Amendment, and related entitlements;
2. Require preparation of a subsequent or supplemental Environmental Impact Report fully analyzing current residential and environmental impacts;

3. Remand the matter back to the CPC with instructions to impose legally enforceable residential protections;
4. Require independent structural inspections before, during, and after construction at applicant expense;
5. Require real-time vibration monitoring with enforceable stoppage thresholds;
6. Require mandatory temporary relocation accommodations during demolition, excavation, pile driving, and high-vibration construction activities;
7. Require mandatory compensation procedures for structural damage, habitability interference, and loss of use;
8. Require continuous methane and air quality monitoring with direct resident notification systems;
9. Require mandatory sound barriers, visual buffering, and enhanced landscape screening adjacent to residences;
10. Require construction-hour restrictions and noise limitations specific to surrounding residential occupancy;
11. Require a binding emergency response and residential protection protocol; and
12. Deny the requested land use amendments unless and until lawful compatibility findings and adequate environmental protections can be demonstrated.

XVI. CONCLUSION

The CPC approval fails to adequately balance public infrastructure objectives with the rights, safety, habitability, environmental protections, and property interests of immediately adjacent residents and surrounding coastal community members.

The proposed approvals create substantial legal, environmental, and land use concerns that warrant reversal, remand, and comprehensive additional review.

Respectfully submitted,

Kenya Lee
Adjacent Resident, Aggrieved Party, and Community Stakeholder
On behalf of affected surrounding residents and community stakeholders

Date: May 26, 2026

XVII. EXHIBIT INDEX

Exhibit A

Venice Neighborhood Council Objection Letter

Exhibit B

Resident Impact Statement – Kenya Lee

Exhibit C

Attorney Correspondence and Objection Letters

Exhibit D

Construction Vibration and Structural Impact Concerns

Exhibit E

Not used

Exhibit F

Not used

Exhibit G

Photographs Demonstrating Lack of Residential Buffering

Exhibit H

Comparative Utility Facility Buffer Examples

Exhibit I

Community Opposition Letters and Stakeholder Correspondence

Exhibit J

Relevant Venice Land Use Plan Policies

https://planning.lacity.gov/odocument/d0a7f30b-87c1-430e-8415-5b5e30d230e7/venluptxt.pdf

and

Coastal Act Policies

https://www.coastal.ca.gov/coastact.pdf

Exhibit K

CEQA Mitigation Deficiency Summary

Exhibit L

Planning Commission Hearing Transcript Excerpts

Exhibit M

Parking Displacement and Access Concerns

Exhibit N

Site Maps, Construction Proximity Illustrations, and Residential Adjacency Diagrams

Not used

Exhibit O

Sierra Club Letter

Exhibit P

Kenya Lee Attorney Letters to Coastal Commission

Exhibit Q

Additional Supporting Administrative Record Materials

Exhibit A - Venice Neighborhood Council Objection Letter

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill

Exhibit A - Venice Neighborhood Council Objection Letter

President
Venice Neighborhood Council

~~EXHIBIT B—Resident Impact Statement Kenya Lee~~

Strumwasser &Woocher

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† in WashingtonAlso admitted to practice

September 3, 2025

California Coastal Commission
455 Market St

reet,

12
50 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Suite 300
San Francisco, CA 94105

Via email only to ExecutiveStaff@coastal.ca.gov

RE: September 11, Items 12a, 12b & 13a.

Dear Coastal Commissioners:

This firm writes on behalf of Kenya Lee, the owner of the property immediately adjacent to the proposed Venice Auxiliary Pumping Plant on Esplanade. Ms. Lee is the closest resident to the proposed construction. Ms. Lee resides in this premises along with her family and young child, and rents the second unit on the property to a tenant. Ms. Lee greatly appreciates the inclusion of proposed Special Condition 1D that requires that the concrete pads and termination boxes that were proposed to be located within the required setback area to be moved outside of the setback. This condition will mitigate some of the impacts of this proposal once it is constructed.

Ms. Lee submits the attached two letters analyzing the proposal and its environmental review. Ms. Lee's request is modest: if the City wishes to construct this facility in the Coastal zone, it should mitigate *all* of its impacts. The City has acknowledged that the noise during the construction phase will require it to provide daytime work locations to residents who work at home. If it is willing to provide those, it should likewise recognize those like Ms. Lee who both work and care for their children at home. The estimated 98dB noise of pile driving at her residence will undoubtedly make it uninhabitable.

While this facility may serve the public broadly, it is clear that Ms. Lee is bearing very heavily the externalities of its construction. The Commission should require the City to fully mitigate the construction impacts on the very closest neighbor.

Yours truly,

Beverly Grossman Palmer

Attachment

Strumwasser &Woocher

1250 6th Street, Suite 205 Santa Monica, California 90401 Telephone: (310)

576-1233
Facsimile:
(310) 319-
0156
www.str
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Michael
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asser
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† Also
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ed to
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July 25, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jennifer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant – August 14 agenda items 16a, 16b, and 17a

Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade, *immediately adjacent* to the proposed Venice Auxiliary Pumping Plant (VAPP). As designed and approved by the City, the proposed industrial facility would have *zero setbacks* from Ms. Lee's property, with large structures housing electrical cabinets constructed within the sideyard setback area along the property line. This project is not ready for review by the Commission: **A zone change application is necessary to rezone the site from residential to public facilities, and the pending application has not been brought for public hearing.** Moreover, the project's approval would violate policies of the Coastal Act, of the Venice LUP and Coastal Zone Specific Plan, and would rest on an inadequate review under the California Environmental Quality Act.

This project will impact ESHA, as the City proposes to construct in one of the few unlined waterways directly connected with the Pacific via the Ballona Lagoon. The proposal would place an additional industrial facility that would handle the sewage of millions of residents without even providing the minimal standard sideyard between that facility and our client's home. The

proposal's environmental impacts on ESHA and on our client are significant, and adequate mitigation has yet to be provided or proposed.

Coastal Act Policies

The project does not conform to the following Coastal Act policies:

> *Section 30253 (a): Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *Section 30253 (b): 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.*

The project is located in area that is known to be vulnerable to sea level rise, flooding and liquefaction. The City relies on the Marina del Rey tide gate's operation to prevent sea level rise in the Ballona Lagoon, but such reliance presumes continued maintenance and operation of those manmade devices. The City's approval acknowledges that extreme flooding or malfunction of the flood gate could lead to flooding of this facility, but does not disclose the impacts of such potential flooding on the environment.

> *Section 30260: (a) Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division.*
>
> *(b) Notwithstanding subdivision (a), where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if all of the following conditions are met:*
>
> *(1) Alternative locations are infeasible or more environmentally damaging.*
>
> *(2) Permitting the development would not adversely affect the public welfare.*
>
> *(3) Adverse environmental effects are mitigated to the maximum extent feasible.*
>
> *(4) The new or expanded coastal-dependent industrial facility is not an oil and gas development, refinery, or petrochemical facility.*

New industrial uses like the VAPP that depend on being near the coast can *only* be approved if

"adverse environmental effects are mitigated to the maximum extent feasible." The City has not completed habitat mitigation long-promised for the Ballona Lagoon, and the (out-of-date) Environmental Impact Report (EIR) discloses impacts to neighboring residents from the construction and operation of the VAPP. The Commission must require the City to go beyond what it has committed to and mitigate "to the maximum extent feasible."

> *Section 30230: Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*
>
> *Section 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*
>
> *Section 30240:*
>
> *(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
>
> *(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

The VAPP does not comply with the above policies, given its location adjacent to the Grand Canal and Ballona Lagoon, as well as the direct impacts on the Grand Canal to construct the subsurface piping components and sluice gates. The project's EIR acknowledges that Southern Coastal Salt March occurs within the area that will be disturbed by the project.

Venice Coastal Zone Land Use Plan Policies

Policy I.A.1.b: "preserve the nature and character of existing residential neighborhoods" "No more than two lots may be consolidated in the Ballona Lagoon West, Ballona Lagoon (Grand Canal) East ..."

VAPP alters, and do not preserve, the residential character. By expanding the existing facility onto three vacant lots, the City's plan violates the LUP policy regarding lot consolidation.

Policy I.A.7.b. Multi-Family Residential – Low Medium II Density – Ballona Lagoon and Grand Canal West Bank Properties North of Ironside

The LUP requires "minimum side yard of 3 ½ feet." The City approved a project that does not provide a minimum side yard in violation of the LUP.

Policy I.D.1: Canals and Ballona Lagoon Walkways. Adjacent Use/Development: "The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs..... New construction along the Canals and Ballona Lagoon shall comply with standards for setbacks, noise barriers, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including offsite drainage improvements.

The VAPP does not comply with this policy because it is not of the type of permissible permitted development, and does not utilize the correct setback from neighboring residential properties.

Policy IV.B.7. Grand Canal Rehabilitation. The Grand Canal between Hurricane Street and Washington Boulevard shall be restored and maintained in order to improve water quality, aquatic habitat, and public pedestrian access along the waterway in a manner that is sensitive to the privacy of adjoining residents.

Policy V. A. 3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible.

Both of the above policies require significant limitations on projects like the proposed VAPP that would impact the habitat in the Grand Canal.

Venice Coastal Zone Specific Plan

Section 10.A.2 (b)(4): The sideyard shall be consistent with LAMC requirements but shall not be less than 3 ½ feet

Section 11.B.4 Building Separation. A minimum of five feet shall be provided between commercial and residential buildings.

As set forth above, the zero yard setback in the north sideyard is in violation of these policies which require setbacks.

California Environmental Quality Act

The EIR for this project was completed in 2017, but failed to disclose that habitat for the El Segundo blue butterfly (the sea cliff buckwheat) was planted in the area south of Washington Boulevard as part of the Grand Canal restoration. The area is included in the El Segundo blue butterfly US Fish and Wildlife Service Recovery Plan for the species. In addition, several Special Status species -- wooly seablite, southwestern spiny rush, and red sand verbena—were present in the project area, and the EIR provides inadequate mitigation for the potential loss of these species.

Conclusion

This project is not ready for the Commission's consideration, because the City has not yet completed the legislative process of changing the project's zoning to permit this public, industrial, use. There is no reason to place this item for consideration now. Moreover, the proposal authorizes development activity that could detrimentally affect the Grand Canal and Ballona Lagoon habitat areas, and which does not comply with basic and important zoning protections for neighboring residents. Please require the City to completely mitigate environmental impacts and to respect the zoning rules it committed to in the LUP and Venice Coastal Zone Specific Plan.

If the Commission permits the project to proceed, it must mitigate the impacts of the project both on the natural resources in the Grand Canal and Ballona Lagoona, and on neighboring residents, including most plainly Ms. Lee, who will be subjected to unwanted noise and air quality impacts. The EIR concluded that construction noise and vibration impacts would be significant and unmitigated. In fact, the EIR found that the proposed pile driving would exceed the thresholds for potential vibration damage at nearby structures. The Commission should require the City to take all measures to mitigate these impacts. The Mitigation Monitoring Program includes a requirement that the City "work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours. The space would ideally have internet service and meeting room space." (BMP NOI-1.) More than needing space during the day, a family like Ms.

Lee's with a young child needs more permanent off site relocation during the construction process. This project serves many, but Ms. Lee is bearing nearly all of the impact of the construction. This need not be the case.

I am available to discuss this matter at your convenience.

Yours truly,

Beverly Grossman Palmer
Strumwasser & Woocher LLP

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401

elephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer Samantha
McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice
in Washington

August 20, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jenn.fer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant

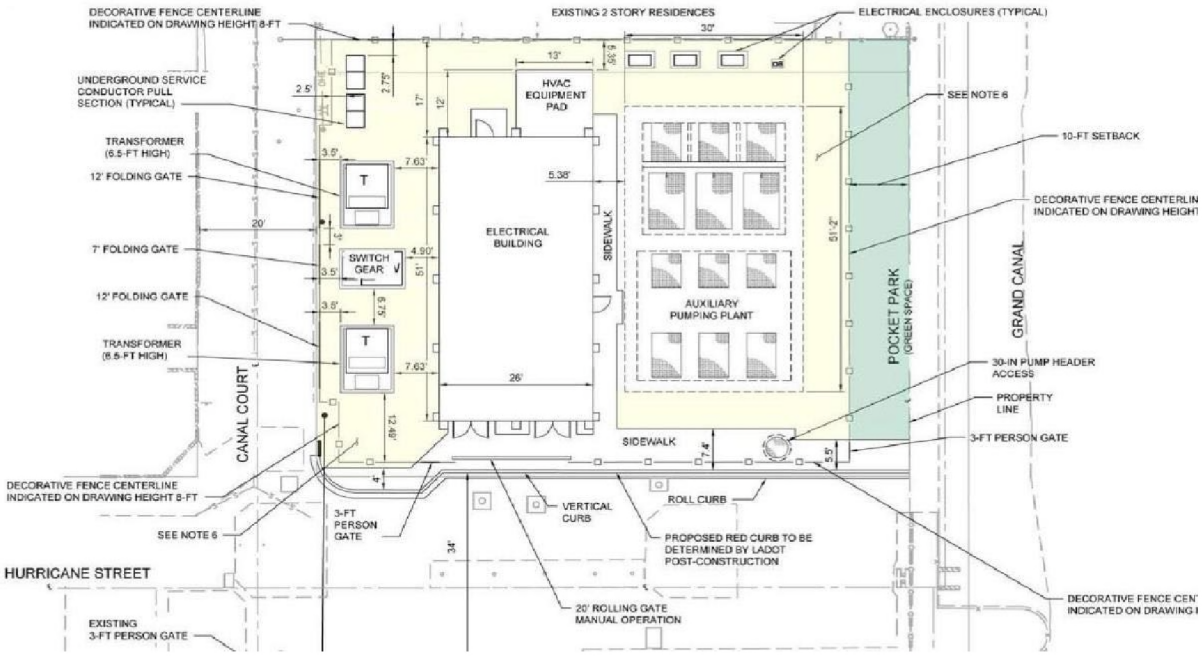
Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade. Thank you for speaking with me about the proposed Venice Auxiliary Pumping Plant project last week. This letter follows up on that conversation, in which you asked about the project's environmental impacts on Ms. Lee, one of the closest (if not the closest) neighboring residents. The purpose of this letter is to provide more specific examples of the impact on Ms. Lee, including where the impact may be greater than identified in the EIR due to design changes since the EIR's introduction.

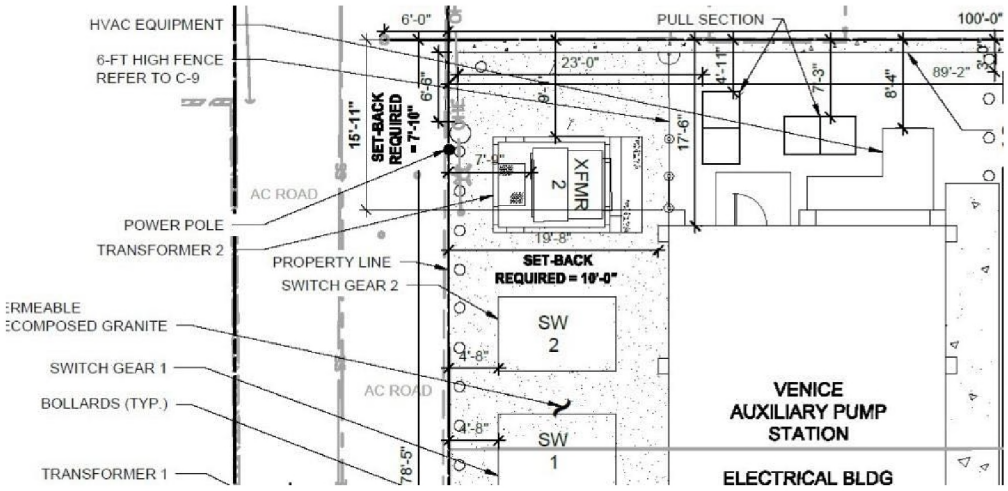
Operational Noise Impacts: Likely Impact For Ms. Lee Due to Design Change

You provided me with July 2025 site plans subsequent to our call. I have compared the July 2025 site plan with the plan included in the 2017 EIR. There is at least one notable change directly relevant to Ms. Lee, which I would like to bring to your attention. The project includes two electrical transformers which are located on the western edge of the property. At the time the project was analyzed in the 2017 EIR, the northern most transformer was located at some distance from the northern property line. The distance is not depicted on the site plans, but based

on the scale on the plans in the EIR (Figure ES-3), it appears to be roughly 30 feet from the property line. The EIR reports that the distance between the northern transformer and sensitive Receptor 2 (Ms. Lee's residence) is 27 feet. (See Table 3.9-16, page 3.9-28.) An excerpt of the EIR site plan is included below for reference.



In comparison, the location of the northern transformer has shifted meaningfully to the north – and **closer to Receptor 2 (Ms. Lee)** on the July 2025 site plans. On the July 2025 plans, a distance of approximately 9 feet between the northern transformer and the northern property line is depicted. This is **three times closer** than analyzed in the EIR.



The new location of the northern transformer is especially concerning given the noise analysis in the EIR at the northern transformer's original location. Has the City been asked to provide an updated noise analysis for this impact? If not, it should be requested to do so.

The original 2017 EIR concluded that operational noise from the transformers (combined) at Receptor 2 (Ms. Lee) would increase noise levels by 2.1 to 3.9 dB over the ambient background noise levels. The threshold of significance in the EIR is an increase of 5 dB over ambient.

Given that the northern transformer has been located three times closer to Receptor 2 (Ms. Lee) than was analyzed, it is likely that operational noise impacts have increased, and most likely have become significant. In general, change in noise volumes due to distance from a point source like the transformer is calculated using the inverse square law. The formula would be:

$56.3\ dB = 41.4\ dB - 20 * \log_{10}(9/50)$

This is far greater than the noise level used in the EIR's calculations of 46.8 dB, and would be cumulated with other operational noise. Given the total noise increase predicted at Receptor 2 (Ms. Lee) was not far from the 5 dB cutoff, the analysis must be re-done with proper noise distances. As I calculate it, the total increase over CNEL will be 11.2 dB, but the Commission should require the City to perform this analysis prior to considering the project.

MM-NOI-3 requires the City to reduce the overall operational noise to within 5dB of the existing community ambient noise levels using design features. (EIR, p. 3.9-31.) The Commission should require the City to explain how relocating the transformers *closer* to Ms. Lee's property is consistent with MM-NOI-3, and what design features have been incorporated to ensure that the overall operational noise, as mitigated, does not increase the operational noise impacts above the threshold of significance at Ms. Lee's residence. As the proponent of the project, the onus should be on the City to prove that it is actually going to mitigate the operational noise, even after altering the project that was analyzed in the EIR.

Other Construction Impacts for Ms. Lee: Significant and Unmitigable

The EIR concluded that that several impacts from the project were significant and unavoidable. These include construction noise, with impacts that would extend for the entirety of the two-year construction period. Pile driving, grading, and jackhammer activities would be particularly disruptive. The pile driving is predicted to result in a 44 dB increase over ambient noise levels at Receptor 2 (Ms. Lee), with volumes reaching 98 dB. (See EIR p. 3.9-21.) While pile driving is the loudest, demolition, paving, and site preparation all involve noise volumes with enormous increases over ambient noise levels.

Sounds levels exceeding 85dB are considered harmful. Every 3 dB rise over 85 dB reduces the safety by half. 85dB is a safe exposure for 8 hours, but at 91 dB, the safe exposure period is only two hours. (See https://www.asha.org/public/hearing/loud-noise-dangers/?srsltid=AfmBOoq5hGug3IPEc3un8s5p76Umz05jZkxmh5M-I-7zeTeiTz7EK2j.) A noise level of 98 dB at Ms. Lee's during pile driving would be unsafe at any duration. Ms. Lee and her young child cannot safely remain in their home during this type of construction.

In addition, Receptor 2 (Ms. Lee) would experience significant vibration impacts during most construction phases, with vibration levels ranging from 0.022-1.781 in/s PPV (page 3.9-23).

Building construction with pile driving would exceed both the annoyance threshold (0.04 in/s) and potential damage threshold (0.3 in/s) at this location (page 3.9-23).

Also of grave concern to Ms. Lee are the dust and particulate matter emissions during construction. With a young child resident in the neighboring home, the dust and particulate matter accompanying construction are a major issue. During construction phases including site preparation, excavation, and shoring, 48 haul trips a day will take place next to her home, on a narrow street not designed for frequent truck traffic.

All of these impacts will greatly interfere with Ms. Lee's ability to enjoy and reside safely in her property with her family. Ms. Lee and her family should not be the only ones burdened by the construction of this public facility.

Environmental Justice

As a community, Venice has been through periods of economic decline. In the 1950s, Venice was considered the "slum by the sea," which may in part explain the original Venice Pumping Plant being located on the shores of the Grand Canal and adjacent to Ballona Lagoon. In the 1930s, this area was considered of poor quality and the area around the VAPP was redlined as a "Grade D." It is likely the legacy of these attitudes that lead this neighborhood to host the pumping plant for sewage from the much of the westside of Los Angeles. The burden of addressing the additional sewage needs of the city will now fall on this community again, most notably during the construction of the VAPP. The Coastal Commission should ensure environmental equity by requiring the City to fully mitigate the impact of construction on the most directly impacted residents, including Ms. Lee.

I am available to discuss these concerns at your convenience.

Yours truly,



Beverly Grossman Palmer

EXHIBIT C--Attorney Correspondence and Objection Letters

GlaserWeil

10250 Constellation Blvd.
19th Floor
Los Angeles, CA 90067
310.553.3000 TEL
310.556.2920 FAX

Clare Bronowski

Direct Dial
310.282.6254
Direct Fax
310.785.3554
Email
cbronowski@glaserweil.com

February 28, 2022

BY E-MAIL

President Millman and Honorable Commissioners
City Planning Commission
200 North Spring Street
Los Angeles, California 90012

Email: cpc@lacity.org

This is the original document filed by the appellants (as renters) who are now former residents of Hurricane St. Their building was sold in 2024 after the owner realized it would be significantly harder to get market rent for multiple years during construction, especially given the lack of ANY buffer (10' required) between the project and property.

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

Dear President Millman and Commissioners:

This letter is submitted on behalf of the appellants, Michael and Genevieve Morrill-Borassi, as well as other neighbors who will be impacted by the proposed Public Works project at 128 and 133 Hurricane on the Marina Peninsula.

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

The background and issues with this facility are summarized as follows:

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.

- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.

- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.

- The project aesthetic design, proposed landscaping and "public art" has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.

- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive. (See attached photographs of trash, graffiti, lack of landscaping, and lack of maintenance of existing facility.)

- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.

- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.

- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

    - <u>Introduction and Background</u>

The project site is in a unique residential neighborhood in the Venice/Marina Peninsula area where apartments, condominiums, duplexes and single family homes

support a thriving and unique residential community enjoying their surroundings between the Pacific Ocean and the Ballona Lagoon/Grand Canal waterway.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

The only saving grace in the current layout is that there are two large empty properties on either side of the existing plant, and this open space has mitigated the impact of the plant on the neighborhood. Now Public Works wants to build on both of these lots, and their new improvements will directly abut existing residences. In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.

- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.

- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.

- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.

- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

- Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

  - The Errors in the Current Approvals

In the cases before you, Public Works has been granted a series of special adjustments and "alternative" compliance measures that don't make sense in this case. While most of the project site adjoins open space, a City facility and streets, the equipment for this facility has been jammed up against the nearest residential uses, with transformers less than four feet from bedroom windows. A more thoughtful design that really fits into this location needs to be proposed.

This project does not meet the performance standards for a Public Benefit Project. A zone change and general plan amendment are required for this project. Per Code, an eligible Public Benefit Project must be improved with a 10 foot landscaped, irrigated buffer along all property lines.

In addition, this project does not meet the standards required for a Conditional Use to allow a parking lot in a residential zone. The finding cannot be made that this use is compatible with adjacent properties and the surrounding neighborhood. The project is not consistent with the general plan as this property is designated for Low Medium Residential use only. A zone change and general plan amendment are required.

The parking lot will be an attractive nuisance in this small residential area unless security, fencing and nightly locked gates are required. The entire parking lot needs to be enclosed with attractive fencing with a residential look and materials to help blend in with the area.

  - The Project Does Not Comply with CEQA

The CEQA compliance for the project is inadequate. Public Works certified its own EIR in 2017 and then an Addendum in 2021. There was no public outreach whatsoever for the Addendum, but the community was notified by the State Dept. of Toxic Substance Control that remediation was needed at the project site.

City Planning has not properly reviewed the CEQA compliance nor included the mitigation measures as conditions as required by law. Each requirement of the MMRP should be included in these public and recorded conditions, so the community knows what is required and can monitor the implementation. Instead, the MMRP can only be found on an obscure Public Works weblink.

Further, the EIR included false and misleading project plans which showed the project footprint further from the closest neighboring residence than it actually is. Even at the on-site meeting, Public Works falsely represented the distance between the nearest residence and the project equipment. The EIR is vague and does not specify the project design, distance between equipment, the type of equipment to be used, and what the neighborhood would be exposed to during and after construction.

- Errors in the Decision

The following errors are made in the findings for Public Benefit Project:

Finding 7 h. An eligible Public Benefit Project must be improved with a 10 foot landscaped, irrigated buffer along the periphery. This is very important to the community and cannot be met.

Finding 7 i. The finding refers to "Condition 4" stating that the project shall include landscaped parking per LAMC 12.21-A 6. There is no such condition and it does not appear that the parking area is sufficiently landscaped.

Finding 7 o. The cited performance standards apply to projects on a major or secondary highway, which this site is not. Therefore, the Public Benefits exception is not available and the project must seek a zone change.

The following errors are found in the Pump Plant and Parking Lot conditions:

Pump Plant Condition # 5 Setback. The notice for this case in 2017 stated that a ZA Adjustment was sought for the northerly side yard. However, the decision grants an adjustment for the westerly rear yard, allowing equipment along Canal Court. There has been no explanation to the community whether in fact the design has changed or what the distance is between the facility, equipment and the nearest residential property directly to the north. The project needs an ample buffer between the residential property to the north and the facility, including a minimum 6 foot block wall and 10 feet of landscaping. The project needs to be designed with a residential look and materials to help blend in with the area.

Parking Lot Condition # 5 requiring "signage" with the parking lot hours will not be sufficient to prevent overnight parking, camping, etc. The parking lot should be gated and supervised with gates locked at sunset. A parking lot in a residential area is an attractive nuisance that must be secured and patrolled.

Parking Lot Condition #4 regarding setbacks is insufficient. There should be a 6 foot block wall and 10 feet of landscaping on the west side of the property to buffer the next door residential uses. The findings mention a 6 foot "decorative fence" and landscaping. These requirements should be spelled out in the conditions so that they cannot be altered, and the fencing should be a block wall where it abuts the residence.

Both Conditions #13. Each requirement of the MMRP should be included in these public and recorded conditions, so the community knows what is required and can monitor the implementation. The Public Works link to the project plans, EIR and Addendum currently does not work, and there is nothing including the MMRP in the case file referenced in Condition 13. We have received notice from the Depart. of Toxic Substances Control that there is active remediation plan at the site. Compliance with these plans should be spelled out in the conditions and recorded covenant.

Both Conditions #15 Final Plans. The community should be given an opportunity to review final plans showing how the facility will be compatible with the adjoining neighborhood in terms of scale, privacy, landscaping and aesthetics.

- Conclusion

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Sincerely,

Clare Bronowski

CLARE BRONOWSKI
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

CB:cb
Attachments

cc: Elizabeth Gallardo
Juliet Oh
Councilmember Mike Bonin

Venice Auxiliary Pump Plan

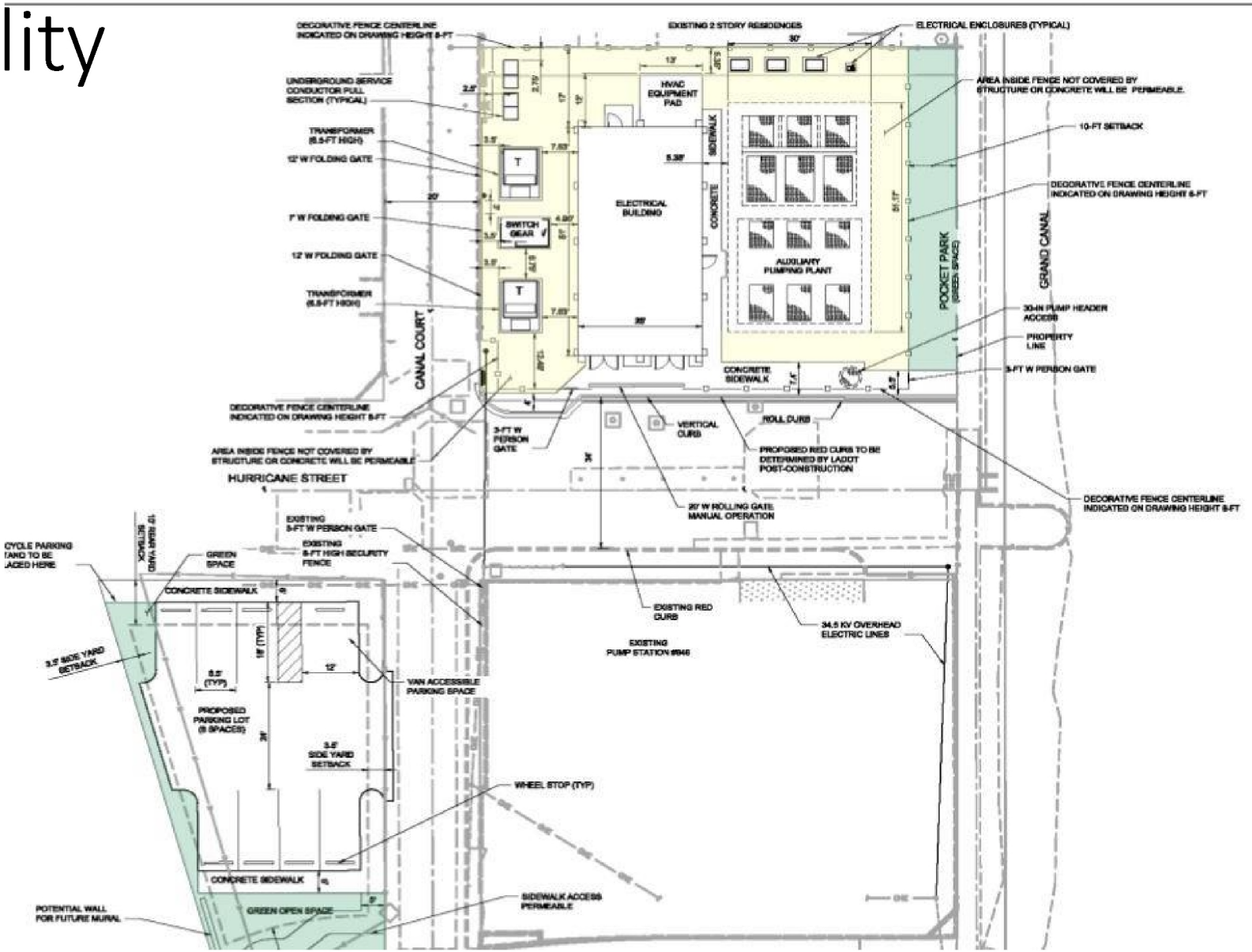
Project Site



Project Site



Proposed Facility layout



Existing Facility: No landscaping





Existing facility: lagoon side, disrepair





Existing graffiti





More graffiti





More graffiti, disrepair





Trash, disrepair





Exhibit D - Construction Vibration and Structural Impact Concerns

To Whom It May Concern, January 20,2026

This letter is submitted to formally preserve objections and concerns under the California Environmental Quality Act (CEQA) regarding the zoning approval for the Venice Auxiliary Pumping Plant (VAPP), including the rezoning of a residential parcel to industrial use.

I am an immediately adjacent residential property owner directly affected by the approval. I previously submitted written comments and appeared in opposition during the public process. This correspondence is intended to ensure that all objections are clearly preserved in the administrative record.

Specifically, I object to the approval on the grounds that the environmental review and findings fail to adequately analyze and mitigate foreseeable impacts, including but not limited to:

- Construction vibration, noise, and structural impacts to an occupied residence
- Temporary and prolonged loss of habitability
- Displacement risks to occupants and tenants
- Economic impacts, including loss of rental income
- Cumulative impacts resulting from industrial use adjacent to residential property
- Deferred or undefined mitigation measures that rely on post-approval determinations rather than enforceable pre-construction safeguards

Approval of an industrial zoning change adjacent to an occupied residential structure without enforceable mitigation measures constitutes a failure to proceed in the manner required by law and raises serious concerns regarding CEQA compliance.

This letter is not intended to be exhaustive. I expressly reserve the right to raise additional CEQA, land-use, and procedural objections as further information becomes available, including through public records requests.

Please include this letter in the full administrative record for the project.

Sincerely,

Kenya Lee
Venice, California
313-999-0264

Exhibit E - Noise and CEQA Threshold References

Exhibit F - Methane Monitoring and Environmental Safety Concerns

EXHIBIT G—Photographs demonstrating Lack of Residential Buffering



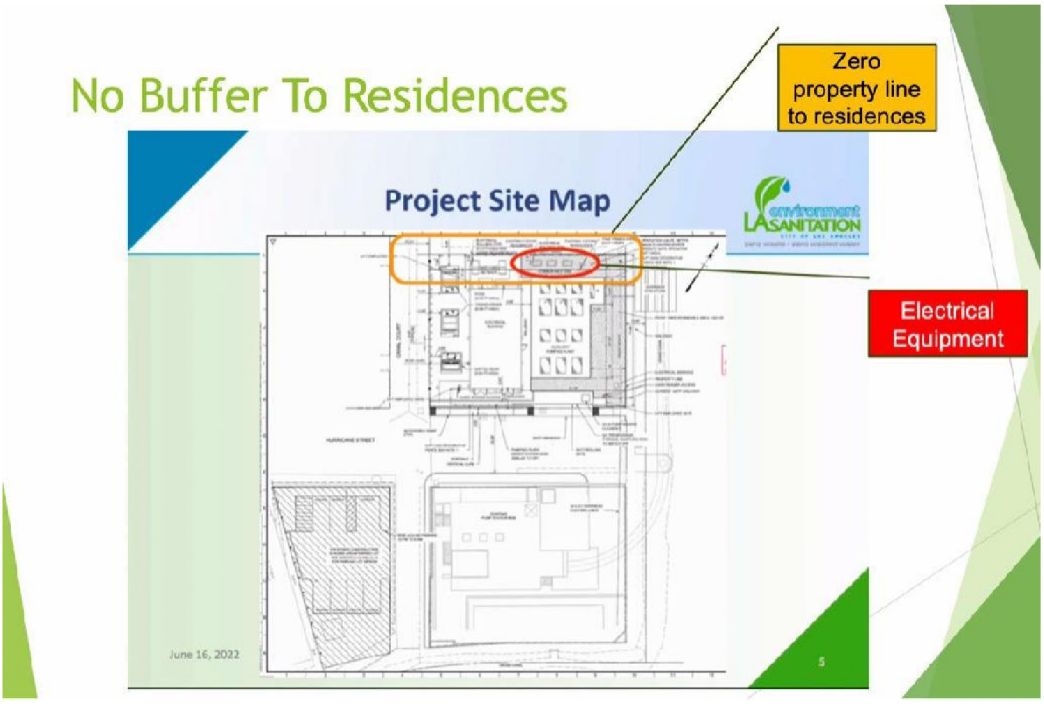


Exhibit H - Comparative Utility Facility Buffer Examples

Exhibit I - Community Opposition Letters and Stakeholder Correspondence

Hurricane Pumps Neighbor Letters

(Last updated: 3/2/26)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3811 ESPLANADE. (ORIGINAL APPELLANTS) 5

KENYA LEE & JOEY JACKSON – 3811 ESPLANADE 6

HARVEY PLOTNICK – 125 & 127 HURRICANE ST (PROPERTY OWNER) 7

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 9

MICHAEL HOFFS – 110 HURRICANE ST 10

MICHAEL HOLT – 127 HURRICANE 11

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 12

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 13

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 14

TING CHANG – 28 MAST 15

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 16

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 17

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 18

TRACI GAY – 310 WASHINGTON BLVD 19

GARY STROMBERG – 125 HURRICANE ST 20

TING CHANG – 28 MAST 21

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 22

PERRY ROD – 3818 PACIFIC AVE 23

MARY-DOROTHY LINE – 125 PRIVATEER MALL 24

MICHAEL HOFFS – 110 HURRICANE ST 25

MARY LAING – 115 HURRICANE ST 27

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS) 28

ADAM GOLDBERG – 110 HURRICANE ST 29

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 30

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST 31

GARY STROMBERG – 125 HURRICANE 33

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE 34

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER) 37

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE 38

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 39

TANYA SPERO – 113 ½ HURRICANE ST 41

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER) 42

JEFF LEE – 3701 ESPLANADE (OWNER) 43

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER) 44

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 45

JENNIFER KELTON – 3615 ESPLANADE 46

MELLY LIBURD – 120 ½ GALLEON (OWNER) 47

ANDREW FREEDMAN – 20 IRONSIDES 48

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 51

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 52

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 53

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 55

JONATHAN TILLMAN – 3719 VIA DOLCE 56

ROBIN RUDISILL 58

ADAM ROSE – MDR PENINSULA 59

ROBERT NAU – 4250 VIA DOLCE 60

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST 61

ELIANE GANS – 3933 ESPLANADE (OWNER) 62

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 63

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3811 Esplanade. (original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Kenya Lee & Joey Jackson – 3811 Esplanade

I am writing to express my deep concerns regarding the ongoing plans for the Venice Auxiliary Pumping Plant (VAPP) project near my home at 3809-3811 Esplanade St in Marina del Rey. For over seven years, our community has diligently attempted to engage with Public Works to address critical concerns related to this project. Unfortunately, our efforts have largely been met with inadequate responses, leaving us feeling overlooked and unsupported.

While I recognize the importance of the VAPP as a critical infrastructure initiative, I am deeply troubled by the substantial and long-term negative impacts the current construction plans will have on my family and our community. Specifically, my primary concerns include:

Exposure to Toxins: The project involves significant excavation directly next to my home, raising serious concerns about potential exposure to hazardous substances that could endanger the health of residents, particularly children.

Structural Vibrations: Intense vibrations from construction activities could compromise the structural integrity of nearby homes, including my own, potentially leading to costly and irreversible damage.

Extreme Noise Levels: Construction noise will significantly affect my household's quality of life, particularly for my young child, whose well-being and development depend on a quiet and stable living environment. I also work from home and need a conducive environment to conduct my business.

Improvement of inadequate emergency access during construction activities.
Having a family residing next to this project concerns us to have an adequate emergency plan,a well thought out plan for emergency services during the time of construction.

Our community has never sought to halt this essential project. Instead, we have consistently requested an open and meaningful dialogue with project stakeholders to ensure fairness and adequate mitigation of these impacts. However, to date, we have seen little action or acknowledgment of our concerns.

The health, safety, and quality of life of our residents must be prioritized as this project moves forward. We are not opposed to progress; we simply seek fairness and the opportunity to live without unnecessary ha.rm or disruption

Thank you for your attention to this matter. I look forward to your prompt response and to working collaboratively toward a solution that benefits both the community and the project's success.

Sincerely,
Kenya Lee
3811 Esplanade, 90292
313-999-0264

Harvey Plotnick – 125 & 127 Hurricane St (property owner)

I own a property on Hurricane Street in Marina del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP Project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on lives for multiple years. My primary concern are:

* Conformance with the certified Venice LUP Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. Policy 1.C.1 states that the sale and design of industrial facilities must be compatible with adjacent and neighboring uses. Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods. Policy 1.D.1 states the only permit development adjacent to the grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

*Meeting established public Benefit standards including a 10' landscaped irrigated buffer along all property lines. The performance stands applied to this project are applicable to those on a major or secondary highway, not a residential street.

* Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are parr of the project plan *The community that introduced elements of the Grand Canal Restoration Plan (Phase 2) to address some of these issues. It is not an all or nothing

*Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas releases. The community has put forth concepts to address some of these issues including the grand Canal Restoration Plan

* Mitigation of "significant and unavoidable" construction-related issues including ground borne vibration which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines. Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is for more reactive than proactive using terms such as "may include." "If considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done. Section MM-NO-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5db of existing ambient noise levels in the surrounding community (53-57db)."

* Change to five day/week construction and more restricted hours in lieu of six days/week.

* Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round. Hurricane St parking will cease to exist during construction hours. Where do these cars park?

* Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted Street parking around the current Venice Pumping Plant (VPP), at

a savings of at least $3.5 million to the city. The community has proposed a viable alternative that does not require this lot.

* Modification of the project design so that it is compatible with the residentially zoned neighborhood. There was very little, if any, community input during the design process,

*Actionable protection of residential properties from dirt, dust and other construction impacts. The community has offered viable suggestions.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness,

Thank you,
Harvey Plotnick

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Michael Holt – 127 Hurricane

Greetings,

I live on Hurricane St in Marina Del Rey.

For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years. My primary concerns are

- Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines.
- Change to five day/week construction and more restricted hours in lieu of six days/week.
- Off-site workspaces for home-based workers
    - The city says it will be managed by the construction company but there have not been any guarantees of location or suitability.
- Actionable protection of residential properties from dirt, dust and other construction impacts.
    - The community has offered viable suggestions.
- Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round
    - Hurricane St parking will cease to exist during construction hours. Where do these cars park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations.

PLEASE support this request for fairness.

Thank you,

Michael Holt
127 Hurricane Street

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT:** The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage.
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines.
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44).
- Inadequate emergency access during construction activities.
- Change to five day/week construction instead of proposed six days/week.
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city.
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1).
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal.
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact.
- Modification of project design so that it is compatible with its residentially zoned neighborhood.
- Protection of residential properties from dirt, dust and other construction impacts.
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical. It has already occurred.
- Resident physical/mental issues due to construction.
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles (City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works (LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main (VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of taxpayers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six workdays.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness. Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live

next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and "public art" has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. and STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee jlee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

CB **Clare Bronowski <clareb1050@gmail.com>** VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however vie wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – MDR Peninsula

I live on the Peninsula a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland, 4300 Via Dolce (condo owner): Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

Exhibit J - Relevant Venice Land Use Plan Policies and Coastal Act Policies

Relevant Venice Land Use Plan Policies

https://planning.lacity.gov/odocument/d0a7f30b-87c1-430e-8415-5b5e30d230e7/venluptxt.pdf

and

Coastal Act Policies

https://www.coastal.ca.gov/coastact.pdf

Mitigation Monitoring and Reporting Program

VENICE AUXILIARY PUMPING PLANT PROJECT

(Environmental Impact Report)

(SCH #2015111038)

Prepared by the

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

BUREAU OF ENGINEERING

May 2017

CITY OF L.A. WEBSITE LINK:
https://apps.engineering.lacity.gov/sites/g/files/wph726/f/7_VAPP_Mitigation Monitoring and Reporting Program.pdf

EXHIBIT K—CEQA Mitigation Deficiency Summary

To Whom It May Concern, January 20,2026

This letter is submitted to formally preserve objections and concerns under the California Environmental Quality Act (CEQA) regarding the zoning approval for the Venice Auxiliary Pumping Plant (VAPP), including the rezoning of a residential parcel to industrial use.

I am an immediately adjacent residential property owner directly affected by the approval. I previously submitted written comments and appeared in opposition during the public process. This correspondence is intended to ensure that all objections are clearly preserved in the administrative record.

Specifically, I object to the approval on the grounds that the environmental review and findings fail to adequately analyze and mitigate foreseeable impacts, including but not limited to:

- Construction vibration, noise, and structural impacts to an occupied residence
- Temporary and prolonged loss of habitability
- Displacement risks to occupants and tenants
- Economic impacts, including loss of rental income
- Cumulative impacts resulting from industrial use adjacent to residential property
- Deferred or undefined mitigation measures that rely on post-approval determinations rather than enforceable pre-construction safeguards

Approval of an industrial zoning change adjacent to an occupied residential structure without enforceable mitigation measures constitutes a failure to proceed in the manner required by law and raises serious concerns regarding CEQA compliance.

This letter is not intended to be exhaustive. I expressly reserve the right to raise additional CEQA, land-use, and procedural objections as further information becomes available, including through public records requests.

Please include this letter in the full administrative record for the project.

Sincerely,

Kenya Lee
Venice, California
313-999-0264

EXHIBIT L

CPC Hearing Transcript

Excerpts

Jan 22, 2026

00:00:00 **Speaker 1 – President Monique Lawshe**
And opening item number six.
00:00:03 Speaker 1 – President Monique Lawshe
Item number six is case number CPC 2024-2010 GPA ZC SPPC CU3 and the related environmental case SCH number 201511103Speaker 8 – Robin Rudisill Venice Auxiliary Pumping Plant Project EIR.
00:00:26 Speaker 1 – President Monique Lawshe
The project area is located at 12Speaker 8 – Robin Rudisill, 133 and 139 East Hurricane Street and various addresses within Council District 11.
00:00:35 Speaker 1 – President Monique Lawshe
At this time, we'll hear from planning staff.
00:00:3 Speaker 1 – President Monique Lawshe
Mr. Brown.
00:00:40 **Speaker 2 – Ira Brown – Ira Brown**
Good morning, President and members of the City Planning Commission.
00:00:43 Speaker 1 – President Monique Lawshe
A little closer to the mic, like Casey told me.
00:00:46 Speaker 2 – Ira Brown
Good morning, President and members of the City Planning Commission. My name is Ira Brown, City Planner with the Department of City Planning, and I'll be providing the staff presentation for this item. Item number six is the Venice Auxiliary Pumping Flat, otherwise known as VAP, located in the Venice Coastal Zone. This project is identified by case number CPC-2024-2010-GPA-ZC-CU3-SPPC.
00:01:27 Speaker 2 – Ira Brown
Slide two shows a rendering of the proposed project looking west from across the Grand Canal. As shown on slide three, the project proposes the construction of a new two-story, 2,2 square foot wastewater pumping plant to provide critical backup capacity to the adjacent Venice Pumping Plant located at 140 Hurricane Street. The project includes subsurface improvements to connect the VAP to the existing pumping plant and work within the Grant Canal to install a temporary cofferdam to construct a diversion structure.
00:02:01 Speaker 2 – Ira Brown
The project includes the construction of a new surface parking lot at 12Speaker 8 – Robin Rudisill Hurricane Street for the VAP and members of the public. As shown on slide 4, the applicant is requesting that the City Planning Commission consider that this project was assessed in the previously certified EIR for the VAP and further supported by the addendum dated October the 29th, 2021 and June 2024, and no revisions are required to the EIR for the approval of this project.
00:02:36 Speaker 2 – Ira Brown
In addition, the applicant is requesting a general plan amendment to the Venice Community Plan and the Venice Land Use Plan to amend the land use designation of the subject site from low, medium to residential to public facility and related changes to the Venice Land Use Plan to facilitate the proposed development.
00:02:57 Speaker 2 – Ira Brown
Continue on slide 5, the project is requesting a zone change from RW2-1 to PF-1, a class 3 conditional

use permit to allow a pumping plant and a surface parking lot within the PF zone, and a project permit compliance review for project located within the Venice land use plant.
00:03:22 Speaker 2 – Ira Brown
As shown on slide 7, the project is located within the Venice community plan area and approximately 1,250 feet from the Venice Beach shoreline and 1,000 feet from the Marina del Way waterways.

00:03:36 Speaker 2 – Ira Brown
As shown on slide nine, the aerial image of the project site located adjacent to the Grand Canal and the existing Venice Pumping Plant. The project site consists of three city-owned vacant lots with a total combined lot area of 12,000 square feet. The three lots are not contiguous. The two lots are the site for the new pumping plant. The lot at 128 Hurricane is the site for the new surface parking lot.
00:04:10 Speaker 2 – Ira Brown
As shown on slide 9, the project is zoned RW-1 with a low medium to residential land use designation. The property is also located within the Marina Peninsula sub-area, the Venice coastal zone-specific plan and the dual permit jurisdiction of the California coastal zone. The neighborhood and the properties surrounding the subject site contain a mix of residential open space and public facility land uses.
00:04:40 Speaker 2 – Ira Brown
Slide 11 shows a recent image of the VAP site looking east from Canal Court. Slide 12 shows a recent image of the site for the surface parking lot looking south from Canal Street. Port, that is.
00:05:00 Speaker 2 – Ira Brown
Slide 14. As shown on the site plan, the proposed project consists of three main components. Above ground improvements, below ground improvements, and a new surface parking lot. The above ground improvements include an operational control center for the plant, including generation room, server room, operations and maintenance room, mechanical equipment room, and a switch gear equipment room.
00:05:23 Speaker 2 – Ira Brown
The site also includes DWP equipment, including transformers and power pools. The below ground improvements include three pumps with a 1 million gallon per day capacity, a diversion structure below the Grand Canal, and a new sewer line to connect the VAP to the existing pumping plant below Hurricane Street.
00:05:42 Speaker 2 – Ira Brown
The surface parking lot includes 7 vehicle parking spaces, bicycle parking, landscaping, including a bios well. The construction activity also includes the oil well re-abandonment. Slide 15 shows the south elevation. Slide 16 shows the west elevation. Slide 17 shows the east elevation. Slide 18 shows the north elevation. Slide 19 shows a rendering of the proposed project from Hurricane Street looking west.
00:06:26 Speaker 2 – Ira Brown
On August the 11th, 2022, the City Planning Commission approved this project, but the project is returning to this commission to address a procedural issue identified by the California Coastal Commission. On September the 11th, 2025, the Coastal Commission found substantial issue with the city's approval of this project, citing the project's conformity with the Coastal Act and the Certified Venice Land Use Plan.
00:06:53 Speaker 2 – Ira Brown
The California Coastal Commission rescinded the city's coastal development permit and approved the project under a de novo coastal development permit with a condition that the city amend the Certified Venice Land Use Plan. The conditional approval required the city to amend the land use plan to change the land use designation of the project site from low medium to residential to public facility. The proposed project, as previously approved by the city, has not changed. However, the proposed public facility land use designation in PF zone requires additional entitlements to allow a wastewater pumping plant and parking lot in the PF zone within the Venice specific plan area.
00:07:43 Speaker 2 – Ira Brown
At the public hearing on May 5th, 2025, and in written comments provided to the public record, members of the public and the Venice Neighborhood Council expressed concerns regarding construction impacts, including noise, vibration, air quality, and project-specific impacts, including setbacks, neighborhood compatibility, and the new surface parking lot. Some of the concerns and issues raised by members of the public have been addressed by the mitigation measures provided in the EIR and the coastal development permit conditions of approval issued by the California Coastal Commission. Other concerns and issues raised by members of the public, including noise attentuation study and construction management plan, will be addressed during the pre-construction phase of the proposed project.

00:0 Speaker 2 – Ira Brown
The service parking lot has generated significant opposition from neighbors. The service parking lot is a requirement of the coastal development permit issued by the California Coastal Commission and the parking standards in the Venice specific plan to facilitate public access to coastal resources. The project site is located in a parking impacted area where new development requires additional parking beyond what is required by LAMC. The subject site is located approximately 1,250 feet from the Venice Beach shoreline and adjoins the trailhead of the Luna Lagoon Marine Preserve Trail. The surface parking lot will be a key amenity to provide coastal access and will relieve demand for on-street parking. In conclusion, staff recommends the commission find the project was assessed in the previously certified EIR for the VAP. and further supported by the addendums date of October the 29th, 2021, and June 2024. And no revisions are required to the EIR for an approval of this project.
00:09: Speaker 2 – Ira Brown
In addition, staff recommends the commission approve and recommend that the city council approve a general plan amendment and zone change to facilitate the proposed project and approve a class re-conditional use permit and project permit compliance review for the proposed project. That concludes staff's presentation, and staff is available for questions.
00:10:05 Speaker 1 – President Monique Lawshe
Thank you.
00:10:06 Speaker 1 – President Monique Lawshe
Next, we'll hear from the applicant.
00:10: Speaker 1 – President Monique Lawshe
Would the applicant please approach the podium, state your name for the record, and speak directly into the microphone.
00:10:20 Speaker 1 – President Monique Lawshe
And how much time do you think you'll need?
00:10:22 **Speaker 3 – Christine Heinrich-Josties**
Approximately 7 minutes. I'm going to try to keep it closer to 5, though.
00:10:26 Speaker 1 – President Monique Lawshe
Thank you.
00:10:32 Speaker 3 – Christine Heinrich-Josties
Hi, good morning, everyone. My name is Christine Heinrich-Josties, and I'm the project representative on behalf of the future owner and operator, LA Sanitation and Environment of the Venice Auxiliary Pumping Plant Project.
00:10:43 Speaker 3 – Christine Heinrich-Josties
I'm joined today by members of the project team as well, who will be able to answer questions as they come up from the commission. A few things that we'll be going over today is project objectives.
00:10:54 Speaker 3 – Christine Heinrich-Josties
So the existing Venice Pumping Plant was built in the 1950s to connect to the coastal interceptor sewer that you can see that runs along the coast there. Services a good portion of the coastal West Los Angeles area. And as mentioned, the existing Venice Pumping Plant was built in the 50s, has been running continuously since then, and is at capacity and has no ability to be rehabilitated without building a redundant facility. So The Venice Auxiliary Pumping Plant will provide that redundancy and reduce the risk of sewer spills near the existing Venice Pumping Plant during extreme wet weather events.
00:11:30 Speaker 3 – Christine Heinrich-Josties
It will provide a redundancy and pumping capacity to improve system reliability and allow for regular service and maintenance activities. I should note also that this project is the last in a series of projects in this area following the Venice Dual Forcemain and the Venice Pumping Plant manifold replacement. that was planned and constructed, and in this case is here for approval to build that redundancy in that area. And so until VAP is built, there's no redundancy. So as IRA's report mentioned, this is the project location located next to the existing pumping plant.
00:12:10 Speaker 3 – Christine Heinrich-Josties

Project elements as certified in the, sorry, as in the certified EAR, again, consist of above and below ground elements. The below ground elements are the pumps, the utility connections, a submerged diversion structure below the Grand Canal that will connect to the existing sewer that runs in the Grand Canal. And then the above ground facilities are oriented in a way to provide support to the below ground facilities, and they consist of an electrical building that's approximately 30 feet in height, electrical equipment, fencing, and or a wall around the facility, landscaping, open space, bike parking, public view, viewing areas, restoration of the habitat area for the area that we are going to disturb during the installation of the cofferdam, and then parking spaces for facility and public use.
00:12:59 Speaker 3 – Christine Heinrich-Josties
As you can see, this is a project rendering from the aerial view. We've also provided or maintained coastal access as required. Here's A rendering similar to the view from planning staff, view from the Grand Canal. And here's a review from the canal court looking approximately S. So project schedule and past milestones, as mentioned, this project initially applied for a coastal development and had the public hearing in December of 2017. A letter of determination was issued in 2021 and a city planning commission approval on appeal occurred in August of 2022. The public hearing for this specific case was held in May of 2025, and the Coastal Commission hearing for this project was held on September 11th, 2025, where we were approved with conditions.
00:13:52 Speaker 3 – Christine Heinrich-Josties
The project is currently in design and approvals phase, and I did want to make a note that the Coastal Commission approval and subsequent notice of intent to issue permit are upon satisfactory of completion of several special conditions, one of which is to submit and receive this change of land use designation from low, medium to multifamily to public facilities.
00:14:13 Speaker 3 – Christine Heinrich-Josties
In addition, the Coastal Commission also requires, amongst many other things, incorporation of appropriate best management practices to minimize construction impacts to coastal resources.
00:14:24 Speaker 3 – Christine Heinrich-Josties
We're going to need to develop an oil spill prevention response plan because there is an oil well abandonment that is part of this project, provide an archaeological and tribal cultural resource monitoring treatment plan and a revised habitat restoration plan to ensure that plants are native.
00:14:44 Speaker 3 – Christine Heinrich-Josties
The next item, I wanted to provide an update regarding public outreach that LA Sanitation and the Bureau of Engineering have done. So we've held approximately 14 meetings with the community members since April 2022. Major topics, as mentioned in the staff presentation as well, relate to the parking lot, parking enforcement concerns, aesthetic concerns, specifically mitigation of impacts during construction, and requests for a single decision maker regarding the VAT. I want to note that the final EIR has a robust mitigation and monitoring and reporting program that will be enacted during the construction phase of this project.
00:15:24 Speaker 3 – Christine Heinrich-Josties
Some key items that I want to note related to that are some of the mitigation measures regarding providing off-site workspace for impacted residents. So the city is going to work with a contractor to identify suitable alternative office spaces for those that work at home during construction hours as needed. We're going to provide dust mitigation as required by local regulations, and then also provide vouchers for car washes or window cleaning with any fugitive dust that might escape the site.
00:15:57 Speaker 3 – Christine Heinrich-Josties
All construction equipment is required to meet tier 3 construction, excuse me, emission standards. One of the biggest items is related to noise, and we have a substantial mitigation program related to noise. The project team and the contractor will implement a noise control program and a noise control plan. And so we have limited construction hours for the heavier construction activities. Hauling is limited to certain hours. Construction personnel, most importantly, because we acknowledge that parking is limited in this area, are not going to be permitted to park on the project site or adjacent streets or a long hurricane, and they will be shuttled in. All piles that will be installed during this project are going to be installed using

vibration and percussive free methods. Noise barriers will be installed with a minimum height of 20 feet to the extent practicable. And lastly, the Bureau of Engineering and the contractor will retain the services of an acoustic cooler noise consultant to prepare a noise monitoring plan that will be site specific and have monitoring and reporting construction of construction noise levels in the community to evaluate the contractor's performance.
00:17:04 Speaker 3 – Christine Heinrich-Josties
We'll have an on-site construction mitigation coordinator with a posted number at the job site that can be reached at any time that will retain a call log. We're also going to perform pre-construction surveys for the residences in the immediate vicinity. That involves us hiring a licensed civil, geotechnical, or structural engineer to do pre-construction surveys, including photograph and or video as needed to document existing building condition and to have a comparison if any damages were to occur during construction.
00:17:3 Speaker 3 – Christine Heinrich-Josties
I'm assuming that's for me.
00:17:39 Speaker 1 – President Monique Lawshe
Go ahead and finish up.
00:17:40 Speaker 3 – Christine Heinrich-Josties
Yeah, and last but not least, we also are going to perform a soil and soil vapor subsurface investigation for the purposes of methane detection with a qualified environmental consultant. And then the project will incorporate any additional mitigation that is necessary and recommended by the consultant based on the results of the subsurface investigation, including active monitoring if necessary. And that was my final presentation. I'm available for any questions as needed.
00: Speaker 1 – President Monique Lawshe
Thank you.
00: Speaker 4 - Cecilia Lamas, Commission Exec Asst
Cecilia Lamas, for the record, I'd just like to note that Commissioner Johnson has joined the meeting but unfortunately won't be able to participate for this item.
00: Speaker 1 – President Monique Lawshe
Thank you.
00: Speaker 4 - Cecilia Lamas, Commission Exec Asst
Welcome.
00: Speaker 1 – President Monique Lawshe
Commissioner Johnson. Okay, we will now, thank you very much. We will now open public testimony for this item. Each speaker who has filled out and turned in a speaker card will have one minute to speak Please approach the podium. As soon as you hear your name called, state your name clearly and then proceed with your comments. And I'm going to call Several names here. Roger Seeden or Scadron, I apologize for any mispronunciation. Kenya Lee and Steve Bradbury.
00:19:17 **Speaker 5 – Roger Scadron**
Thank you.
00:19:17 Speaker 5 – Roger Scadron
My name is Roger Scadron. I live about 500 yards from the proposed site on 20 Ironside Street.
I am also co-lead of a 300-person strong unincorporated association of neighbors called the Venice Neighbors for Responsible Development. We absolutely agree and appreciate the efforts being made by all of you and by the Department of Sanitation to promote safety of this facility.
00:19:55 Speaker 5 – Roger Scadron
Our one ask from my group of people is for public safety, we would like to have 24-7 monitoring of methane, not just soil testing, but of methane, with plans in place for a website access, full transparency, and a plan to shut down the facility if the threshold is surpassed.
00:20:2 Speaker 1 – President Monique Lawshe
Thank you, sir. That is your time.
00:20:30 Speaker 5 – Roger Scadron
Thank you so much.

00:20:41 **Speaker 6 – Kenya Lee**
Good morning, commissioners. Thank you for allowing me to speak. My name is Kenya Lee, and I live directly, immediately next to the proposed VAP plant. My home shares conjoined soil with the project, and it sits within reduced setbacks, placing my family at a higher risk position than any scenario that's analyzed in the EIR, such as vibration, methane gas, exposure, injury, and it also states even death. I want to be clear about what is being offered to me. I was recently informed that any harm would be addressed after it occurs through discretionary community impact allowance or filing a damage claim with the city clerk. This is not mitigation. This is liability management after the fact. The mitigation measures proposed by LA Sanitation are generic and reactive. They do not prevent the loss of my home, the loss of income, or the possibility that my home becomes uninhabitable during construction.
00:21:52 Speaker 1 – President Monique Lawshe
Thank you very much.
00:21:53 Speaker 1 – President Monique Lawshe
I'm sorry that minute goes very fast.
00:21:56 Speaker 6 – Kenya Lee
Thank you.
00:21:57 Speaker 1 – President Monique Lawshe
Next speaker.

00:22:10 **Speaker 7 – Steve Bradbury**
I'm Steve Bradbury, 109 Hurricane, and I'm the primary community representative. To be clear, nobody in this neighborhood has ever opposed this project on the merits. For years, we've been trying to work with LA Sand to mitigate the impact on our quality of life and protect our property. Sadly, they are not a willing partner. The Coastal Commission imposed 19 special conditions on this project, mostly environmental. Even so, their representative testified, we're willing to do anything we can to address neighbor concerns. This is simply not the case.
00:22:42 Speaker 7 – Steve Bradbury
Notwithstanding CD11's continued dialogue with LA San, which we very much appreciate, we're asking you to please impose conditions today to mitigate 3 significant and unavoidable areas of impact. Methane gas exposure, loss of street parking, and residential property protections. LA San should be required to look out for our interests. They are not doing that. Please protect us from their short-sighted decisions. I can provide the community's viewpoint for any questions you may have, and I have copies of what we'd like to see happen. I'm happy to share that with everybody.
00:23:16 Speaker 1 – President Monique Lawshe
Thank you very much.
00:23:20 Speaker 4 - Speaker 4 - Cecilia Lamas, Commission Exec Asst
Cecilia Lamas, for the record, Mr. Bradbury's submissions are in the Google Share Drive, and they were considered day of submissions.
00:23:26 Speaker 4 - Cecilia Lamas, Commission Exec Asst
You can access them there.
00:23:2Speaker 1 - President Monique Lawshe
Okay, thank you, Cecilia. Do we have any hybrid participants?
00:23:34 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Cecelia Lamas, for the record, at this time we do not have any hands raised.
00:23:3 Speaker 1 – President Monique Lawshe
Okay, and I don't know if there are any certified neighborhood council reps, but I do have a council representative.
00:23:47 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Yes, Cecilia Lamas for the record.
00:23: Speaker 4 - Cecilia Lamas, Commission Exec Asst
We do have Robin Rudisill here today, and the community impact statement is in the Google Share Drive

as a day of submission as well.
00:23:56 Speaker 1 – President Monique Lawshe
Okay. And there's a Sean Silva.
00:24:06 Speaker 1 – President Monique Lawshe
Yes, please proceed.
00:24:0Speaker 8 – **Speaker 8 - Robin Rudisill**
Good morning. I'm Robin Rudisill, and I'm speaking on behalf of the Venice Neighborhood Council. The council's position relates to whether the project's impacts are meaningfully mitigated. The community has repeatedly raised serious concerns related to Coastal Act and land use plan conformance, environmental protections, and construction impacts.
00:24:27 Speaker 8 – Robin Rudisill
The City Planning Commission itself instructed Public Works to meet with the community. Despite those meetings, none of the core issues have been materially addressed. That record goes directly to the fact that mitigation has not been seriously considered. The VAP is the largest sewage plant station in Los Angeles, placed directly adjacent to a home and the Grand Canal and Bayona Lagoon, both court-mandated protected coastal environmentally sensitive habitat areas and within a very dense residential neighborhood. The citywide context for this project is striking. Los Angeles does not cite large or expanding sewage infrastructure in sensitive coastal ecosystems and residential neighborhoods, except here.
00:25:12 Speaker 8 – Robin Rudisill
Comparable facilities such as Hyperion, Terminal Island, and Tillman Sewage Plant are either isolated or buffered. Typical LA neighborhood pump stations are small, largely underground, and unobtrusive. This project is an outlier in scale, location, and impact. No other neighborhood in Los Angeles has been asked to absorb a project of this magnitude under these conditions. Given that reality, meaningful mitigation must be done.
00:25:39 Speaker 8 – Robin Rudisill
One mitigation within your authority that would meaningfully reduce harmful impacts is eliminating the proposed parking lot after construction. The parking lot is not required for operation of the facility as parking for the VAP is met on site. The parking lot is at best a nice to have for coastal visitors. At worst, it imposes a permanent land use change, a zone change, and ongoing and significantly increased impacts, including neighborhood safety on a residential area already bearing the extraordinary burdens from the VAP. Selling the lot after construction would protect neighborhood character from a non-conforming parking lot use, And as the city paid 2.7 million to acquire the land, a sale would be a windfall during these challenging economic times. It's the clearest opportunity to lessen the cumulative impact on this community.
00:26:35 Speaker 8 – Robin Rudisill
We therefore urge the Commission to condition approval on the sale of the parking lot following construction and on requiring public works to finally agree to good faith, results-oriented conditions to address the remaining community concerns on residential building protection and health and safety. This is about fairness and doing the right thing for a neighborhood that is already given far more than any other in the city.
00:27:06 Speaker 1 – President Monique Lawshe
Thank you. And is Mr. Silva here?
00:27:10 Speaker 1 – President Monique Lawshe
He's here. He's in the back. Oh, here he is.
00:27:30 **Speaker 9 – Sean Silva**
Good morning, Commission President, Commission.
00:27:36 Speaker 9 – Sean Silva
That's better.
00:27:37 Speaker 9 – Sean Silva
Sean Silva speaking on behalf of the Office of Councilwoman Tracy Park.

00:27:42 Speaker 9 – Sean Silva
Speaking today to offer our office's perspective on the Venice Auxiliary Pumping Plant project before you. The project is, first and foremost, a critical piece of infrastructure and an indisputably important supplement to the city's current conveyance of wastewater through the existing Venice Pumping Plant, which is already operating near or at capacity far more often than is optimal.
00:2S Speaker 9 – Sean Silva
We believe that this is acknowledged by all, the project team, the community, our office. What we believe deserves equal consideration are the questions, comments, and concerns that have been raised by the community. Throughout the outreach process and over the course of several years, the project team has been engaged with the community, yes.
00:2 Speaker 9 – Sean Silva
But because of the unique nature of the project, its proximity to residential properties, to the Grand Canal, by its very nature as a public infrastructure project, there has been cause for our office to engage meaningfully and often to advocate for our constituents.We have fielded their questions and concerns. We've continuously relayed the questions and concerns we've received to the department staff.
00:2 Speaker 9 – Sean Silva
We've sought enhanced and precise mitigation measures for noise, parking, impacts, methane emissions, construction-related damage to property, and the environmental impacts to the environmentally sensitive habitat area. We have joined and pushed for meetings with the neighbors set to be most impacted by the project and ensured that they had extraordinary access to executive staff from LA Sanitation, which agreed, of course.
00:29:13 Speaker 9 – Sean Silva
We have followed upon this with a commitment to keeping this level of attention as the process continues. The request from our office to our department is to work with any and all constituents impacted, but particularly the closest neighbor, Ms. Lee, whom you heard speak today, whose property's proximity to the project brings about unique potential ramifications.
00:29:32 Speaker 9 – Sean Silva
Throughout the course of this process, our team has been engaged and responsive to the community's concerns and remains pledged to our commitments made during the course of the ongoing discussion.
00:29:41 Speaker 9 – Sean Silva
More work remains, of course, and we appreciate the chance to stand with our community through this process. Ultimately, we do support the project, but we urge the commission to consider our support qualified, pending the full fulfillment of the guarantees made to and owed to the community by the city. Thank you for your time and your consideration of the comments I've made.
00:30:02 Speaker 1 – President Monique Lawshe
Thank you very much.
00:30:05 Speaker 1 – President Monique Lawshe
That was the last speaker and public testimony is now closed. Would planning staff care to address some of the issues and concerns raised?

00:30:16 **Speaker 2 – Ira Brown**
Ira Brown for the record. I would just like to draw your attention to the mitigation monitoring plan in your staff report. It can be found in exhibit C1, there's a list of all the mitigation measures that were provided by the applicant when she spoke for your reference. I would like to also emphasize that this project was approved by the California Coast Commission, and one of the requirements was for the parking lot. That parking lot is a necessary aspect of this project for coastal access, and it is required per the parking requirements in LAMC and the Venice specific plan, in the Venice Land Use Plan. Those are my additional comments.
00:31:00 **Speaker 10 - Commissioner Phyllis Klein**
This is Commissioner Klein. Can you repeat where the mitigation plan is in your presentation? In the...
00:31:0 Speaker 2 – Ira Brown

Yes, it is exhibit C and specifically C1. There is a series of links and it's I believe the...
00:31:1 Speaker 1 – President Monique Lawshe
That's exhibit C of the staff report.
00:31:20 Speaker 2 – Ira Brown
Yes.
00:31:21 Speaker 1 – President Monique Lawshe
It's the environmental clearance.
00:31:22 Speaker 2 – Ira Brown
Yes.
00:31:23 Speaker 1 – President Monique Lawshe
Okay.
00:31:25 Speaker 2 – Ira Brown
And it's a link. You'd have to link to that document.
00:31:30 Speaker 1 – President Monique Lawshe
Thank you.
00:31:33 Speaker 1 – President Monique Lawshe
We'll now begin our deliberation and discussions.
00:31:37 Speaker 1 – President Monique Lawshe
And as we do, can you please put up the best image you have of the new, the existing improvements, the new improvements, and the neighboring properties?
00:32:01 Speaker 2 – Ira Brown
Let me just draw you to this picture first. So it is the house in the background. Well, no. So it would be the house in the background, would be the, I believe, the owner's Kendra Lee.
00:32:37 Speaker 1 – President Monique Lawshe
Wait, go back.
00:32:39 Speaker 1 – President Monique Lawshe
The house, which house in the background?
00:32:41 Speaker 1 – President Monique Lawshe
The beige on the right or the?
00:32:44 Speaker 1 – President Monique Lawshe
Can you point to it?
00:33:0 President Monique Lawshe
That structure, okay.
00:33:13 Speaker 2 – Ira Brown
And then, as well, it would be.
00:33:27 Speaker 1 – President Monique Lawshe
And okay, go back to go back to that slide.
00:33:30 Speaker 1 – President Monique Lawshe
So, Miss Lee's home is that one, and then
00:33:36 Speaker 1 – President Monique Lawshe
The white space in between, is that an alley, a street, a walkway?
00:33:40 Speaker 1 – President Monique Lawshe
What is that?
00:33:41 Speaker 2 – Ira Brown
This here is a street. No, to the, yeah. It's that. This would be Hurricane.
00:33:4 Speaker 1 – President Monique Lawshe
That's Hurricane.
00:33:49 Speaker 2 – Ira Brown
And this would be the existing pumping plant, and this would be the parking lot.
00:33: 1 – President Monique Lawshe
Okay, thank you.

00:34:00 Speaker 1 – President Monique Lawshe
I am going to start on my right with Mr. Rosenstein.
00:34:06 **Speaker 11 - Commissioner Brian Rosenstein**
Commissioner Rosenstein for the record.
00:34: Speaker 11 - Commissioner Brian Rosenstein
So a couple questions. When I use Google Maps to look at the existing condition down there, the end of Hurricane is fenced in one picture, but then there's cars parked at the end of hurricane in another picture. Though some of the residents had expressed concern as I look at these photos of Google Street Map, that street is heavily impacted by resident parking, it looks like. And So what is the plan for that part of hurricane between what will be the new expansion and the existing building?
00:34:51 Speaker 2 – Ira Brown
Maybe I can refer you to the applicant. I assume you're talking about during construction.
00:34:55 Speaker 11 - Commissioner Brian Rosenstein
No, permanently.
00:34:56 Speaker 2 – Ira Brown
Permanently.
00:34:57 Speaker 2 – Ira Brown
Well, the street will be open to public access after construction, there will be some additional.
00:35:05 Speaker 11 - Commissioner Brian Rosenstein
So Hurricane that leads to that green section there, that's that dark green section. So that'll remain open and operable. It's a dead end.
00:35:15 Speaker 2 – Ira Brown
It's a dead end.
00:35:16 Speaker 11 - Commissioner Brian Rosenstein
Right, but it'll remain open. It's not going to be vacated or nothing like that.
00:35:22 Speaker 2 – Ira Brown
Is correct. It's going to be maintained open.
00:35:23 Speaker 11 - Commissioner Brian Rosenstein
So the concerns about loss of parking that the residents express, that's temporary during construction.
00:35:31 Speaker 2 – Ira Brown
That's correct. There will be one or two spaces that will be removed for a new curb cut on Hurricane. And those two spaces will be replaced in the surface parking lot per the coastal commission requirements.
00:35:46 Speaker 11 - Commissioner Brian Rosenstein
Okay. And so for the surface parking lot, so that's a coastal commission requirement. So in order for us to proceed, and comply with Coastal Commission. That's what we are required to build that parking lot.
00:35:5 Speaker 2 – Ira Brown
That is correct.
00:35:59 Speaker 11 - Commissioner Brian Rosenstein
And are there going to be, I guess it's, are there going to be hours of operation? Are there going to be conditions of use for the parking lot? Are there going to be restrictions? Can anyone speak to like, are the residents going to be able to use that 24 hours a day? Is it just for people who are going for a walk? What is the purpose of that parking lot?
00:36:24 Speaker 2 – Ira Brown
The purpose of parking lot is for public access, so it will be available to the public from sunrise to sunset. It is also required for the staff of the pumping plant.
00:36:37 Speaker 11 - Commissioner Brian Rosenstein
And so for the residents who are concerned about parking impacts, I guess this, I guess it's a net, it's a net zero for them, right? They're not losing anything as a result of this project.
00:36:53 Speaker 2 – Ira Brown
That is correct. And one can say that they are gaining additional 5 spaces. Right, which is how many are in that parking lot. It's 7, it's seven, but they're losing two on the street.

00:37:06 Speaker 11 - Commissioner Brian Rosenstein
They're losing two on the street for good.
00:37:07 Speaker 2 – Ira Brown
Yes.
00:37: Speaker 11 - Commissioner Brian Rosenstein
Okay, got it. All right, and then as far as, so the new building that's being built or expansion or whatever you want to refer to it, is about 3,000-ish feet?
00:37:23 Speaker 1 – President Monique Lawshe1
32, 3300 feet.
00:37:25 Speaker 2 – Ira Brown
Two stories, 2,300 square feet.
00:37: Speaker 11 - Commissioner Brian Rosenstein
Okay. And the existing building that's their plant, which was built I think in 1950, is that right?
00:37:39 Speaker 2 – Ira Brown
The 50s, I don't know.
00:37:40 Speaker 11 - Commissioner Brian Rosenstein
50s, okay. So that's been there longer than we have. So how big is that building? I mean, is it, what I'm trying to get to is how in scale, how big is that compared to this little, the building that's being added on to?
00: Speaker 2 – Ira Brown
Maybe I could bring up the applicant?
00: Speaker 1 – President Monique Lawshe1
Sure. Yes, please. She's coming.
00: Speaker 3 – Christine Heinrich-Josties
Hi, good morning again.
00: Speaker 3 – Christine Heinrich-Josties
My name is Christine Heninrich-Josties again for the applicant LA Sanitation Environment. So in scale, the building, the existing building is about the same size. the big difference is that there's like a giant vent stack for odor control that was, a part of the construction and design in the 50s. So it's roughly equivalent in nature.
00: Speaker 11 - Commissioner Brian Rosenstein
Okay. Maybe you can speak to this because this came up a bunch from residents who spoke were concerned specifically about methane.
00: Speaker 3 – Christine Heinrich-Josties
Yes.
00: Speaker 11 - Commissioner Brian Rosenstein
So can you talk about that just a little bit more about how that works? What is it producing? What are the mitigations and monitoring just to try and address some of the concerns.
00:39:00 Speaker 3 – Christine Heinrich-Josties
Yes, so I can speak to, as far as I understand, then I can ask my project design team to come up and answer any questions if you have additional ones.
00:39: 3 – Christine Heinrich-Josties
So the project location along with, you know, a lot of other potential projects or houses or whatnot in that area is in an established methane zone because it used to be oil wells and oil producing area. There is an oil well on the 128 Hurricane that has been abandoned. But as part of this project, we are going to ensure that it has been abandoned to proper current standards and re-abandoned if necessary.
00:39:32 Speaker 11 - Commissioner Brian Rosenstein
So a potential outcome of that abandonment effort, if not done correctly, is release of oil and or methane.
00:39:41 Speaker 3 – Christine Heinrich-Josties
In 2018 was an initial environmental review of that lot done for testing of, for soil testing, soil vapor testing, I believe, of methane. None was detected at that time. Of course, we are going to, before we start

construction or disturb any of the earth, perform another test to ensure that there are no new issues to consider. The LA Department of Building and Safety has methane zone building requirements.
00:40:11 Speaker 3 – Christine Heinrich-Josties
We are, as I understand, in the lowest requirement to mitigate because we are in a methane zone. So even though there was none detected, we still have to provide a methane mitigation for the building once it's constructed.
00:40:22 Speaker 11 - Commissioner Brian Rosenstein
So we will, because we're in the zone.
00:40:24 Speaker 3 – Christine Heinrich-Josties
Exactly, because we're in the zone. so as I mentioned in my presentation, we're committed to, again, doing what we said on our mitigation plan, which is performing the testing as needed prior to disturbing of any soil and then enacting anything that is recommended by the consultant.
00:40: Speaker 11 - Commissioner Brian Rosenstein
So does the plant produce any methane on its own?
00:40:42 Speaker 3 – Christine Heinrich-Josties
No.
00:40:43 Speaker 11 - Commissioner Brian Rosenstein
Okay. So the concern, the methane concern has to do with the existing condition.
00:40:4 Speaker 3 – Christine Heinrich-Josties
Correct. Yeah. With that oil well there. Yeah.
00:40:50 Speaker 11 - Commissioner Brian Rosenstein
Which you tested and you're going to test again.
00:40:51 Speaker 3 – Christine Heinrich-Josties
Yes.
00:40:52 Speaker 11 - Commissioner Brian Rosenstein
I see.
00:40:53 **Speaker 12 – Commissioner Caroline Cho**
This is Caroline Cho. I just wanted to add something if that's okay. So I was looking at Exhibit C and we did have some concerns in regards to the methane monitoring and it sounds like from LADBS it's under their jurisdiction and they're not requiring it.
00:41:09 Speaker 3 – Christine Heinrich-Josties
Yeah, they're not requiring, as far as I understand, they're just requiring a passive system, not an active system. And so yeah, it is an LADBS requirement that we provide. I mean, any other house in the area that would have like a new development in the methane zone would also be required to go through this clearance with LADBS.
00:41:25 Speaker 12 – Commissioner Caroline Cho
Okay, I just wanted to clarify that because there were some comments from the public.
00:41: Speaker 3 – Christine Heinrich-Josties
Yes, I understand.
00:41:29 Speaker 12 – Commissioner Caroline Cho
Thank you.
00:41:30 Speaker 1 – President Monique Lawshe
And sorry, and along, you know, along that same line, since it's a passive versus active, so What does that mean for course of construction? Is there a one-time check? Is it once a week? Is it every day? Or is it once and then that's it?
00:41:51 Speaker 3 – Christine Heinrich-Josties
That's a fantastic question about the logistics of that. Let me double check with my project team. Hector, do you have anything to add? So we have our design engineer here, Hector Arias from Arcadis, who's going to be able to answer that a little bit more.
00:42:05 Speaker 1 – President Monique Lawshe
Thank you.

00:42:10 **Speaker 13– Hector Arias Project Team**

Good morning. So you can imagine the building. Under the building, there's a slab. That slab has a couple of layers of sand and plastic that capture possibly the gases from the methane that may raise to that accumulate under the slab of the building. That system has a series of perforated pipes, collects that gas, It goes to a pipe, it gets filtered, and there's a system that measures the amount of methane. If anything, will come out of the grass and collect it on the building. So that's the way. It's a passive system. It doesn't have a fan that sucks or pushes the air or looks for the gases. It just collects it at the bottom of the slabs and then lets it go to the surface after it gets filtered.

00:43:00 Speaker 1 – President Monique Lawshe
Right, but that's after the new construction is built.

00:43:04 Speaker 13– Hector Arias Project Team
Correct. Yeah.

00:43:06 Speaker 1 – President Monique Lawshe
And I understand that process you just got right perfectly. I'm asking during the course of construction, how would one know?

00:43:14 Speaker 13– Hector Arias Project Team
During construction, just as part of the OSHA safety measures, when they're digging, when they're excavating, when they have a shorting system 20 feet deep, they constantly have some monitoring system. All the workers have a attachment to their best and they have a permanent station at the bottom of the excavation. So they constantly will monitoring the amount of methane because they need to vacate. They're going to have fans, but they will need to vacate if they reach the level that is a niche.

00:43:42 Speaker 1 – President Monique Lawshe
Okay, thank you. Don't go away. Commissioner Rosenstein, did you have other questions?

00:43:47 Speaker 11 - Commissioner Brian Rosenstein
A couple. So, I'm trying to remember what my other question was. It sounds like, so based on all the testing you've done so far, there's no active methane. And that well has been abandoned.

00:44:09 Speaker 13– Hector Arias Project Team
It has been abandoned, but it was done on the 30s. So we're going to re-abandon.

00:44:14 Speaker 11 - Commissioner Brian Rosenstein
You said in the 30s?

00:44:15 Speaker 13– Hector Arias Project Team
Yes.

00:44:15 Speaker 11 - Commissioner Brian Rosenstein
Okay. Yes. So. But you tested in 2018

00:44: Speaker 13– Hector Arias Project Team

00:44:19 Speaker 11 - Commissioner Brian Rosenstein
And there was no sign of any methane at all.

00:44:22 Speaker 13– Hector Arias Project Team
Correct.

00:44:23 Speaker 11 - Commissioner Brian Rosenstein
And the soil came back fine.

00:44:25 Speaker 13– Hector Arias Project Team
Correct. But just to make sure that there's nothing coming on the future from that board that is a couple 1000 feet deep. They're going to re-drill it, not re-drill it, remove the existing plug or a new plug and cap it permanently.

00:44:40 Speaker 11 - Commissioner Brian Rosenstein
Got it. Per the latest standards. So belt and suspenders. Make sure it's done right. Okay. And then next question, can you talk about for the neighbors who are immediately adjacent? So obviously there's going to be noise. Obviously, there's going to be a vibration. Can you talk about the mitigations that are going to be in place for during construction? And also, what's your construction timeline? I know when you're starting, but I mean, what's your estimate on how long it will take?

Exhibit L - Planning Commission Hearing Transcript Excerpts

00:45:16 Speaker 13– Hector Arias Project Team
The heaviest, more disruptive portion of construction, the excavation and the structuring. Which is sort of at the beginning. It's at the very beginning, and it can take between 6 to 9 months. drill a second pile, sheet piles, 20 feet deep, make the diversion structure on the canal, build the underground wet well. So that's about the time. And during that time, though, that heavy equipment, right? We're going to have what we call the sound curtains around the site. Yep. 20 feet wall. You can see on the freeways. They have a cushion. And we're also going to require that the rigs, the big cranes that has the equipment, they have an encapsulator system that is the same thing. It's like double on the perimeter and then one around the equipment. And then we're going to have the sensors that detects the vibrations. And there's a threshold 0.02 particle per second. If they reach that one, they will have to stop and reassess what type of equipment need to change or lower the speed of the excavation or lower the speed that they used to drill the tuning system.
00:46: Speaker 11 - Commissioner Brian Rosenstein
So you have a decibel threshold for sound and you have a vibration threshold for vibration.
00:46:32 Speaker 13– Hector Arias Project Team
Correct.
00:46:33 Speaker 11 - Commissioner Brian Rosenstein
And you'll have the sound dampening.
00:46:35 Speaker 13– Hector Arias Project Team
Yes.
00:46:35 Speaker 11 - Commissioner Brian Rosenstein
And then what's the total timeline from start of construction to completion?
00:46:40 Speaker 13– Hector Arias Project Team
It will be between, I want to say two years, but three years and a half.
00:46:45 Speaker 11 - Commissioner Brian Rosenstein
But the crux of the Noise and impact will be the six to nine months at the beginning. After that, everything's inside the building, so there's pretty much no dust, no noise coming into the neighborhood, but the beginning is the most disruptive part of the project. Understood. All right, I think that's it for me at the moment.
00:47:0 Speaker 1 – President Monique Lawshe
Okay, thank you. Commissioner Saitman.
00:47:11 **Speaker 14 Commissioner Jacob Saitman**
This is Commissioner Saitman for the record. I wanted to talk about more methane essentially. You had alluded to the fact that construction workers would be wearing sensors at all times to ensure that methane levels stay within, I would call it a healthy zone, although methane isn't necessarily healthy at all. You know, and you also alluded to the fact that if they're were, risk of methane inhalation that construction workers would be requested or required to abandon, at least temporarily, the construction site. What is the risk? Are we going on the microphone? Okay, thank you. What is the risk to the homeowners where, if there is a methane leak detected, that, you know, requires an abandonment of the construction facility, at least temporarily, What is the, emergency response plan for mitigating measures for neighbors who might be impacted by methane?
00: Speaker 13– Hector Arias Project Team
Yes, just on a historical record, a couple of years, well, five, six years ago, they did some improvements on that location. They installed the pipe that feeds that pump station. So during those years and a half that took to construct the system, those wells that were even deeper, they monitor the methane right? And we didn't all these methane mitigations because we are on a methane zone, but all those excavations, they never detected matings about the threshold. So there's a preset record that during the excavations, that they were deeper than the one that we're going right now, they never encountered a pocket of methane or the neighbor experienced that it was coming from the barn of excavations into the surface. But There's a protocol if they were to reach the certain levels, they're supposed to turn off more of the fans. They always have fans over there. And if there were to be a pocket of methane, they will have to bucket the

site. And then there will be a protocol for emergency to bucket the neighbor if for whatever reason they found a pocket of methane on the area.
00:49:24 Speaker 14 Commissioner Jacob Saitman
So there is an established emergency protocol to vacate the neighborhood. is what I'm hearing.
00:49:29 Speaker 13– Hector Arias Project Team
Correct. There will have to be one. There's no record or never been encountered one. And the reason why there's a methane protocol is just because we are in a methane zone. But yes, there will be a protocol for that.
00:49:47 Speaker 14 Commissioner Jacob Saitman
So can I add something here? Because I think maybe this will help bridge the gap. So I understand.
00:49:52 Speaker 1 – President Monique Lawshe
Can you?
00:49:53 **Speaker 15 - Commissioner Pricilla Chavez**
Yeah, Priscilla Chavez, sorry. Commissioner Chavez, for the record.
00:49:56 Speaker 15 - Commissioner Pricilla Chavez
So I understand there's a geotech report that the department has already issued. So for my fellow commissioners, the way that methane in my experience working for a contractor, the way that methane is identified, it's not, it should not be spontaneous, right? There's lots of efforts to identify it before we're actually digging in any type of ground. So I understand per exhibit that was previously mentioned, that although the department has issued a geotech report, you will also require the contractor to also hire their own geotech engineering firm who would also survey the grounds of where they're going to build. So when there is excavation and demolition, we're actually able to identify if those grounds are soiled and or if there's any harmful toxic waste, methane, et cetera, in that ground. Is that correct?
00:50:54 Speaker 13– Hector Arias Project Team
Yes, they have to do their own geotechnical borings because they need to design some of the charging systems. So they're going to do that ahead of the starting the mass excavation.
00:51:02 Speaker 15 - Commissioner Pricilla Chavez
So this would be in advance of any digging or excavation. So I think what that means for us and what that means for residents is that if we were to, and correct me if I'm wrong, but if we were to identify any methane within that geotech report, assuming that the contractor's engineer finds it, then there would be a pivot of some sort.
00:51: Speaker 13– Hector Arias Project Team
Correct.
00:51:29 Speaker 15 - Commissioner Pricilla Chavez
And this would be in advance of digging. Is that correct?
00:51:34 Speaker 13– Hector Arias Project Team
That's correct.
Speaker 15 - Commissioner Pricilla Chavez
Yeah, I guess. my concern of additional risk would be seismic vibrations or seismic activities disturbing the capped oil well during the construction period, which is why I'm curious about, you know, if that is a non-zero risk, that there would be some sort of, even if it doesn't need to be used, an emergency operating plan to protect the health and safety of the neighbors.
00:52:02 Speaker 3 – Christine Heinrich-Josties
Yes, so that is one of, in the rare event that something would happen that would impact the oil well and there's like, say, a spill of oil or associated materials, that is one of the conditions that the Coastal Commission has of us prior to permit issuance that we develop a plan and a response plan as part of that. So we will have that, you know, buttoned down before we even, you know, finalize design technically.
00:52:25 Speaker 15 - Commissioner Pricilla Chavez
Okay.
00:52:27 Speaker 13– Hector Arias Project Team
Just one more clarification. The wet well, is at the parking outside. So we're not going to disturb the well

other than when we're recapping and reclosing the well. The excavation and the deep excavation is on the other side. So the well issue is just to recap it and close it for the future.
00:52: Speaker 15 - Commissioner Pricilla Chavez
Okay. Thank you. I do have one other question related to public comment and also some of the submissions from public testimony with respect to property protections, I hear and acknowledge and understand that there have been studies conducted to ensure that the appropriate mitigation measures will be put into place to reduce the risk of, you know, property damage. I believe it was Kendra Lee who made a comment about how there is a, I don't remember if she said it was a zoning variance or a reduced setback for her property, but I just want to ensure that if there are any, neighbor complaints of drywall cracking or, shifting of foundations, that there is a vehicle in place for, local neighbors or landowners to submit statements with evidence and, seek, restitution for damages that might be required to fix some of the seismic related damage.
00:53:55 Speaker 3 – Christine Heinrich-Josties
Yes, so as I mentioned in my presentation, we will be conducting pre-construction surveys just to provide a baseline of the adjacent properties. And then in addition to during construction, we have a 24-7 line that you can call. We'll have a dedicated community outreach staff whose sole responsibility is this specific project and to liaise with the community for any issues that come up. So if they have issues related to noise, related to dust, or related to other construction issues or they notice damage in their house, they can reach out to this individual and we respond very quickly. This is an LA sanitation community outreach team that we have that works very closely with the Bureau of Engineering as well and work closely with the contractor and Conad as well. So we will, we have a mechanism in place to handle that. In addition, you know, we try to anticipate as part of the mitigation measures and as part of the development of the contract documents, we try to anticipate potential issues and put aside, a dollar amount to mitigate. So for example, I had mentioned car wash vouchers or window washing vouchers as a potential mitigation for fugitive dust. That would be something that we could pay out of that mitigation allowance. If some more substantial damage were to occur, of course, that's something that we could consider as well. But it will be handled there on the spot with dedicated community outreach representatives.
00:55:16 Speaker 15 - Commissioner Pricilla Chavez
Okay. I just want to make One point of clarification, I said Kenderly, I meant Kenya. I don't want to get your name wrong, so I apologize for that, but I don't have any further questions. So thank you.
00:55:30 Speaker 1 – President Monique Lawshe
Thank you. Commission President Lawshe, for the record, I just want to belabor this point and don't go away because you guys are great, but I'm asking planning staff. So there are two lots. One will have the parking lot and one will have the building, the new building, right?
00:55:51 Speaker 2 – Ira Brown
for the record, that is correct.
00:55:53 Speaker 1 – President Monique Lawshe
And so as I'm looking at the Google Maps view of the world, I'm assuming the smaller lot will be the parking.
00:56:03 Speaker 2 – Ira Brown
That is correct. The lot one on Hurricane Street 128 is the service parking lot.
00:56:13 Speaker 1 – President Monique Lawshe
And is Ms. Lee's residence next to that?
00:56:17 Speaker 2 – Ira Brown
No.
00:56:20 Speaker 1 – President Monique Lawshe
So, okay, so again, in my Google Map view of the world, it looks like there's a concrete block or some kind of masonry fence adjacent to the lot that LA San intends to build on. Is that correct?
00:56:40 Speaker 2 – Ira Brown
That is correct, although I don't have that same image on my screen right now. So I could go to Google Street View and see what you're seeing.

Exhibit L - Planning Commission Hearing Transcript Excerpts

00:56:50 Speaker 1 – President Monique Lawshe
So what is, so my question is, what is the setback distance between the building and what looks like a concrete masonry wall?
00:57:05 Speaker 2 – Ira Brown
Let me pull up the site plan. Give me one second. So this is Ms. Lee's structure. This is the pumping plant here. There is a, bear with me one second. There is a 16-foot setback from the structure to the property line. There is a series of termination boxes, which are boxes that just have basic wiring in them.
00: Speaker 1 – President Monique Lawshe
Okay, so those quote unquote termination boxes, I see three.
00: Speaker 2 – Ira Brown
Yes.
00: Speaker 1 – President Monique Lawshe
Do those make any noise?
00:5 Speaker 2 – Ira Brown
They do not make any noise, is my understanding from talking to the applicant. They are just boxes full of wires. And they are 3 1/2 feet from the property line, these boxes. And then there is a series of transformers here, and those transformers are further than 16 feet from the rear side property line.
00:5 Speaker 1 – President Monique Lawshe
I'm sorry, point to the transformers again. Okay, so they're not adjacent to any residential structure.
00:5 Speaker 2 – Ira Brown
That is correct. They are adjoining Canal Court.
00:59:02 Speaker 1 – President Monique Lawshe
I see Commissioner Saitman has a pressing question.
00:59:05 Speaker 14 Commissioner Jacob Saitman
I just want to make a point of clarification for the public. Transformers do make a low humming noise. However, from 16 feet away, it should not be a concern for noise pollution at a private residence. So that's all I wanted to state on the record. Thank you.
00:59:21 Speaker 1 – President Monique Lawshe
Thank you. I appreciate that.
00:59:25 Speaker 1 – President Monique Lawshe
The parking lot, and it's my understanding that this is a requirement that the Coastal Commission has imposed. Is that correct?
00:59:34 Speaker 2 – Ira Brown
It is a requirement of the coastal development permit. It's also a requirement of the Venice-specific plan as well.
00:59:41 Speaker 1 – President Monique Lawshe
Okay, and will that, and you mentioned it would operate from dusk to dawn, and then will it be locked after dusk?
00:59:49 Speaker 2 – Ira Brown
I would have to defer to the applicant on that question.
00:59:53 Speaker 3 – Christine Heinrich-Josties
No, so there is no plan to lock the facility. It is required to be accessible. One of the requirements that the Coastal Commission does have is like final submission of parking lot signage to make it very knowledgeable to the public that there is public parking available. So it'll be something that we submit as part of our package to Coastal to get permit issuance.
01:00:15 Speaker 1 – President Monique Lawshe
Well, I understand the coastal access. But I don't understand why the parking lot cannot be gated when it's closed at dusk and reopened.
01:00:2 Speaker 3 – Christine Heinrich-Josties
Yeah, so what we were told is that we have to provide access to parking at all times. So as part of the proposed plans, we had not incorporated any locking.

Exhibit L - Planning Commission Hearing Transcript Excerpts

01:00:39 Speaker 1 – President Monique Lawshe
Can planning set, I've never heard of that. May I? I thought the Coastal Commission requirement was dusk till dawn.
01:00: Speaker 3 – Christine Heinrich-Josties
They did.
01:00:49 Speaker 3 – Christine Heinrich-Josties
They did say no overnight parking is fine. Yeah.
01:00:51 Speaker 1 – President Monique Lawshe
So, but we didn't.
01:00:52 Speaker 1 – President Monique Lawshe
Was there a specific condition saying you can't chain it or anything?
01:00:55 Speaker 3 – Christine Heinrich-Josties
I don't recall seeing anything in the staff report, no.
01:00:59 Speaker 1 – President Monique Lawshe
So, I mean, there's two parts to that.
01:01:02 Speaker 1 – President Monique Lawshe
One, you chain it, then prevent overnight parking, which is, can be good. At the same time, it also means that the residents can't use it for overnight parking. So, you know, it's like, But it sounds like from the condition that Coastal put on there, there's no reason why at, dusk that you could.
01:01:26 Speaker 3 – Christine Heinrich-Josties
Yeah, that's correct.
01:01:26 Speaker 1 – President Monique Lawshe
Close it. I mean, most of our local parks in Los Angeles are open dawn to dusk and then they put a gate up and, you know, go in there at night. I think if there's a dawn to dusk condition, then at dusk you could in theory. close it.
01:01:45 Speaker 3 – Christine Heinrich-Josties
Okay, yeah.
01:01:46 Speaker 1 – President Monique Lawshe
I think that would be the correct thing to do, given the neighbors' concerns. I mean, we all know about camping out. It's been a huge issue in Venice over the years, so I don't know why it would be kept open.
01:02:01 Speaker 3 – Christine Heinrich-Josties
Yeah, that's, I mean, that's something the project team can consider. You know, making an adjustment to that. We need to just I don't see anything in the coastal staff report that would preclude us from doing so, but I would like to confirm with coastal staff that that's not considered a major adjustment.
01:02:20 Speaker 1 – President Monique Lawshe
Okay, well, I would like to make that a condition of any approval that occurs.
01:02:26 Speaker 1 – President Monique Lawshe
So that's all I have for now.
01:02:27 Speaker 1 – President Monique Lawshe
Commissioner Klein.
01:02:29 Speaker 10 - Commissioner Phyllis Klein
Yes, Commissioner Klein, for the record. I wanted to commend Steve Bradbury and the Hurricane Street community for their for their letter, and I wanted staff to address some of their suggestions, which to me seem infinitely reasonable to occur, some of which you have mentioned. But I wanted to know what would be the cost of an ongoing methane detection system at the property? I know that it doesn't exist, but we're due for some seismic event, and I would prefer that there not be a circumstance where this becomes an emergency. So what would be the cost and why can't that be provided?
01:03:19 Speaker 3 – Christine Heinrich-Josties
So regarding the cost, I don't have a hard number for that. Unfortunately, I don't even have a ballpark number. So that's something I need to, you know, get information on and follow up about. And as I mentioned before, you know, it's going to be the whatever mitigations we do and act will be dependent on

what the environmental consultant finds upon the soil exploration. So if they find, no detectable methane in those areas, they might not recommend anything. But if they find detectable methane that exceeds a certain level, that could be a cause of concern, then they might recommend, you know, monitoring or more widespread monitoring, and we would enact that. But unfortunately, I have no cost impact. So, you know, the only thing I can reiterate as the applicant is that we're going to enact what we need to based on the results of that environmental.
01:04:09 Speaker 10 - Commissioner Phyllis Klein
Okay.
01:04:11 Speaker 1 – President Monique Lawshe
Question regarding, there's something mentioned in that letter about a cure and defect fund that will be established. Can you elaborate on that fund? and what the process would be and how that will be funded and what access will be.
01:04:33 Speaker 3 – Christine Heinrich-Josties
So this entire project, as with other wastewater projects within the city of Los Angeles, is funded entirely by the sewer fund. So all dollars associated with this project will come from that general, that sewer fund that we have. The project fund is not necessarily a fund, it's more of a, what we call a construction allowance. So it's a certain dollar amount that we put in the bid documents. that will be included that the contractor can draw on to pay for issues that arise during construction. So one very simple example would be a resident says their car got dusty because of fugitive dust. We have to issue a car wash voucher. That allowance would pay for that. Another example would be, say there is damage to a house. like a window broke, that resident that observed that issue would contact our community outreach team. The community outreach team would work with the resident, would work with the Bureau of Engineering Construction Manager, and then, you know, that allowance would be able to pay for fixing that.
01:05:32 Speaker 1 – President Monique Lawshe
So there isn't a. you don't have a specific amount now that is in the construction budget.
01:05:37 Speaker 3 – Christine Heinrich-Josties
Correct. We're still, so we're, as I mentioned, we're in the design and approvals phase, so we're still working on wrapping up the final details of design. So, you know, the overall cost of the project hasn't been completely finalized. And as a result, we haven't finalized any bid documents either. So that dollar amount has not been finalized. I can't unfortunately share that with you at this time.
01:05:5 Speaker 1 – President Monique Lawshe
Is it mandatory that such a fund be established? What if your construction costs exceed what you thought and that is eliminated? Or is that a requirement of the project?
01:06:09 Speaker 3 – Christine Heinrich-Josties
I'm not sure if it's mandatory that we establish this allowance. I know it is established for many of the other sewer projects that we have. If the funds run out, generally we go through a process to request more funds, typically requiring Board of Public Works approval. And then, you know, we'll be able to increase the funds in that and increase the contract ceiling and be able to pay through that contract vehicle.
01:06:34 Speaker 1 – President Monique Lawshe
Okay. I would probably like to add a requirement that there be a mandatory fund for mitigation for the neighborhood.
01:06:42 Speaker 3 – Christine Heinrich-Josties
Yes. it was already going to be part of what we do, but we'll take that as a note. Thank you.
01:06:47 Speaker 1 – President Monique Lawshe
Okay. I'm curious about, it was mentioned in several of the comment letters about requiring a mandatory sale of this parking lot, which I'm not really understanding what that provides to be the city would be a better source of this, but I guess it's all about employee parking. So I, yeah, can you just clarify that.
01:07:16 Speaker 3 – Christine Heinrich-Josties
So the 128 Hurricane lot was acquired through eminent domain in, I believe, the beginning of 2023 for $2.7 million. The city has never proposed selling it back. The parking lot, as mentioned, is required to meet the parking requirements for a new development in that area. Even though there are, I believe, three

parking spots on the pumping plant site itself, Technically, we need 4 spaces for employees, and of course we have to provide the public parking as well. So the lot is still, from what we understand, a requirement to provide as part of this project, and the city has never proposed selling it back.
01:07:59 Speaker 1 – President Monique Lawshe
Okay, great. I think that's it for now. Thank you.
01:0 Speaker 3 – Christine Heinrich-Josties
Thank you.
01: Speaker 1 – President Monique Lawshe
So just a I appreciate just the response and just providing clarification to our questions.
01: Speaker 15 - Commissioner Pricilla Chavez
I wanted to close the loop on the recommendation that my fellow commissioner, Commissioner Chavez for the record. Thank you. I saw the eyes on me. That my fellow commissioner recommended, which is an emergency exposure plan. So can you just talk a little bit about that? Is that something you will do, will consider doing? Just because I do think that is that would be good stewardship on our behalf.
01: Speaker 3 – Christine Heinrich-Josties
Yes, for sure. So that is something that we will definitely enact. It's one of the requirements to work with local emergency personnel as well to ensure, you know, there's access and safe access to the site and that everything is done in a safe and health-oriented manner, right? So once the contractor is on board and we have, you know, the appropriate names of individuals and the appropriate names of who to contact in each department, that is something that we will establish and have available for the project team.
01:09:11 Speaker 1 – President Monique Lawshe
Thank you. No further questions.
01:09:12 Speaker 3 – Christine Heinrich-Josties
Thank you.
01:09:13 Speaker 1 – President Monique Lawshe
Commissioner Diaz.
01:09:17 **Speaker 16 – Commissioner Martina Diaz**
Commissioner Diaz, for the record, I believe that all of my fellow commissioners have already raised several sort of concerns that were on my mind . So I appreciate the staff. I also appreciate the members of the public that came to testify for the project. But at this point, I don't have any other comments.
01:09:36 Speaker 1 – President Monique Lawshe
Thank you.
01:09:37 Speaker 1 – President Monique Lawshe
Okay, as one follow-up.
01:09:39 Speaker 11 - Commissioner Brian Rosenstein
Commissioner Rosen, for the record. Construction schedule just hours, 7 to 3, just for the residents who are here who are...There is, okay, so operation of construction equipment shall occur only between 8a-
01:09:59 Speaker 3 – Christine Heinrich-Josties
to 6 P.m. Mondays through Saturdays. The use of the heavier equipment such as pile drivers, graders, and jackhammers are limited from 9 A.m.to 3.30 P.m.
01:10: Speaker 1 – President Monique Lawshe
Is that Monday through Saturday also?
01:10:10 Speaker 3 – Christine Heinrich-Josties
Yes, Monday through Saturday also. Haul trucks can only access the site through local neighborhood streets from 9 A.m. to 4 P.m. And then materials deliveries should not occur earlier than 8a.m.And then the earliest any construction personnel are permitted on the project site is 730.So half an hour prior to start, yeah.
01:10:31 Speaker 1 – President Monique Lawshe
So Speaker 8 A.m.is your start time.
01:10:33 Speaker 3 – Christine Heinrich-Josties
Correct. 8 A.m. is our start time. And you know, it's something that has been brought up by the

community about the days of construction. It is Generally, our intent and most city projects follow the Monday through Friday, unless there is something emergent that happens. Exactly. And there's something emergent that happens or say there's a task that has to be completed in sequence that can't take a break. That would be the only time that we really consider Saturday work.
01:10:56 Speaker 1 – President Monique Lawshe
Okay, so basically for the residents that are here, it's going to be a Monday through Friday job.
Yes, starting at 8 Yes.
01:11:03 Speaker 1 – President Monique Lawshe
Okay. And The only other thing I wanted to add is just for the residents that came here today, I just want to say from my experience, I want to thank you all for just being so reasonable in regards to this project. It's very rare that we have people expressing concerns and also be supportive at the same time. So I just wanted to acknowledge that. That's nice to have and that's nice to hear from the community. Thank you.
01:11:32 Speaker 11 - Commissioner Brian Rosenstein
Commission President Lachey, I echo the thanks to the dedicated community members and your thoughtful correspondence.
01:11:46 Speaker 1 – President Monique Lawshe
So I'm just looking through that one more time. In this letter, there's a statement that no parking, no parking is allowed on Hurricane Street during construction hours. Is that true?
01:12:00 Speaker 3 – Christine Heinrich-Josties
So there will be periods of time where we need to access with larger trucks. So at that point, there will be no parking available on Hurricane, yeah.
01:12:09 Speaker 1 – President Monique Lawshe
But that's situational.
01:12:10 Speaker 3 – Christine Heinrich-Josties
Correct, that's situational, yeah. And you know, as part of our community outreach efforts, we do the best that we can to give ample notice. I mean, in our mitigation and monitoring program, it just says provide hours worth of notice to affected residents. We try to do more than that when we can.
01:12:26 Speaker 1 – President Monique Lawshe
And where can the public get an update? Once construction has started, this monthly or this mitigation plan, can I go to a website and see what the monitoring activity revealed the prior week?
01:12:46 Speaker 3 – Christine Heinrich-Josties
I mean, that's definitely something we can enact. this project does have a website on the Bureau of Engineering and the LA Sanitation side. The Bureau of Engineering one is a little bit more detailed right now because it does host the EIR and the relevant documents. But that is something we can definitely enact. And as mentioned before, we will have that dedicated individual that's keeping a call log that will be there to address issues. And of course, we're going to work in continued partnership with CD11 as well and enact suggestions that they might have for better community relationships.
01:13:16 Speaker 1 – President Monique Lawshe
So, okay, so one of the additional conditions I would like to see is that, because you're saying it could be done, it can be done. Okay, so that's not, we will do it.
01:13:32 Speaker 3 – Christine Heinrich-Josties
Okay, I mean, we definitely can provide a website with updates, yeah.
01:13:36 Speaker 1 – President Monique Lawshe
Okay, website with updates. Okay, great. I have no further questions. Any other questions or comments from commissioners?
01:13:49 Speaker 1 – President Monique Lawshe
Commissioner Klein.
01:13:50 Speaker 10 - Commissioner Phyllis Klein
If you could just outline some of the conditions first before we go through a vote so that we're sure of what we're going to.
01:13:57 Speaker 1 – President Monique Lawshe

Yes, let's go through the buckets as a former commission president would say.
01:14:03 Speaker 1 – President Monique Lawshe
Okay, so condition number one that we talked about was locking the parking lot, making the parking lot inaccessible between dusk and dawn. We also talked about a mandatory fund for neighborhood damage and LA San committing to that mandatory fund. We understand that you don't have the exact dollar amount now, but we'd like that commitment as part of the approvals.
01:14:39 Speaker 3 – Christine Heinrich-Josties
Yes, and so we would call it a bid allowance, if you don't mind, instead of a fund, because what would you a bid allowance.
01:14:45 Speaker 1 – President Monique Lawshe
A bid allowance. Okay, so a bid allowance for damages. The third thing was an emergency protocol plan for the neighbors, that actually be a plan that gets baked into the materials. And then 4th was a website for the public to access regarding, I know we discussed methane mitigation in particular, but updates on the project as it goes along would be helpful. Did I miss anything?
01:15:29 Speaker 14 Commissioner Jacob Saitman
This is Commissioner Satan. If we have the agency, if we could request that the emergency response plan be delivered to all neighbors in advance of an actual emergency, as opposed to a reactive notification to neighbors, I think that would be appreciated.
01:15:46 Speaker 1 – President Monique Lawshe
Yes. So the emergency response plan be delivered in advance of construction.
01:15:54 Speaker 3 – Christine Heinrich-Josties
Yes, that can definitely be done.
01:15:56 Speaker 1 – President Monique Lawshe
Okay.
01:15: Speaker 1 – President Monique Lawshe
With that, do I have a motion on this item? Commissioner Klein moves to approve with the amendments listed by Commissioner Lawshe
01:16:09 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Cecilia Lamas for the record. Commissioner Klein, you mean move to approve staff's recommended actions, correct?
01:16:14 Speaker 10 - Commissioner Phyllis Klein
Yes. Move to approve staff's recommended actions, including the items noted by Commissioner Lachey.
01:16:21 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Understood. Thank you.
01:16:23 Speaker 1 – President Monique Lawshe
Thank you.
01:16:23 Speaker 1 – President Monique Lawshe
We have a first. Is there a second?
01:16:25 Speaker 14 Commissioner Jacob Saitman
This is Commissioner Saitman. I'll second the motion.
01:16:27 Speaker 1 – President Monique Lawshe
Cecilia, we have a first and a second. Please call for the vote.
01:16:30 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Cecilia Lamas for the record. Commissioner Klein.
01:16:32 Speaker 10 - Commissioner Phyllis Klein
Yes.
01:16:33 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Commissioner Sateman.
01:16:33 Speaker 14 Commissioner Jacob Saitman
Yes.
01:16:34 Speaker 4 - Cecilia Lamas, Commission Exec Asst

Exhibit L - Planning Commission Hearing Transcript Excerpts

Commissioner Chavez.
01:16:35 Speaker 15 - Commissioner Pricilla Chavez
Yes.
01:16:35 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Commissioner Diaz.
01:16:36 Speaker 16 – Commissioner Martina Diaz
Yes.
01:16:37 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Commissioner Rosenstein.
01:16: Speaker 11 - Commissioner Brian Rosenstein
Yes.
01:16: Speaker 4 - Cecilia Lamas, Commission Exec Asst
Commissioner Vice President Cho.
01:16:40 Speaker 12 – Commissioner Caroline Cho
Yes.
01:16:41 Speaker 4 - Cecilia Lamas, Commission Exec Asst
Commissioner President Lawshe
01:16:42 Speaker 1 – President Monique Lawshe
Yes.
01:16:42 Speaker 4 - Cecilia Lamas, Commission Exec Asst
And the motion carries.
01:16:43 Speaker 1 – President Monique Lawshe
Thank you all.
01:16:44 Speaker 1 – President Monique Lawshe
Thank you very much.
01:16:45 Speaker 3 – Christine Heinrich-Josties
Thank you.
01:16:47 Speaker 1 – President Monique Lawshe
That is, we're concluding item 6 on closing item 6 and opening item number seven.

EXHIBIT M—Parking Displacement and Access Concerns

HURRICANE PUMPS

Our MDR Community in Action

VNC Board: Aug 20, 2024

What is VPP/VAPP?

- **VPP – Venice Pumping Plant**
  - Gravity brings sewage to Hurricane St
  - VPP pumps sewage to Dockweiler
  - Built in 1957
  - Five aging pumps
  - LA nerve center
- **Phase One: Dual Force Main Project**
  - New 54” pipe under Hurricane St.
  - 2017-2023
  - Misery for residents
- **Phase Two: VAPP – Venice Auxiliary Pumping Plant**
  - New & improved replacement for VPP
  - Tangentially presented to the community during Phase One meetings (2015)
  - Public meeting in 2017 – ”no changes since 2017” **Not true**
  - VPP becomes redundant backup

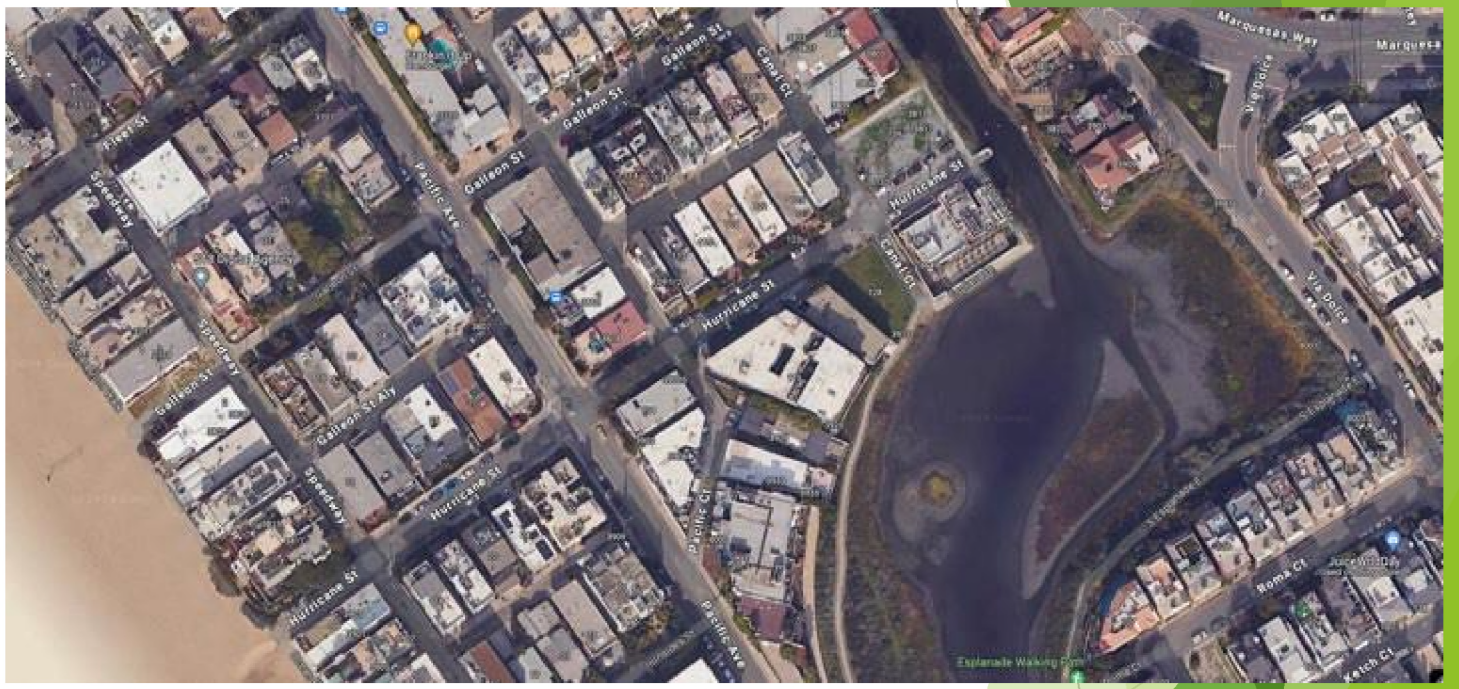


MDR - 1960



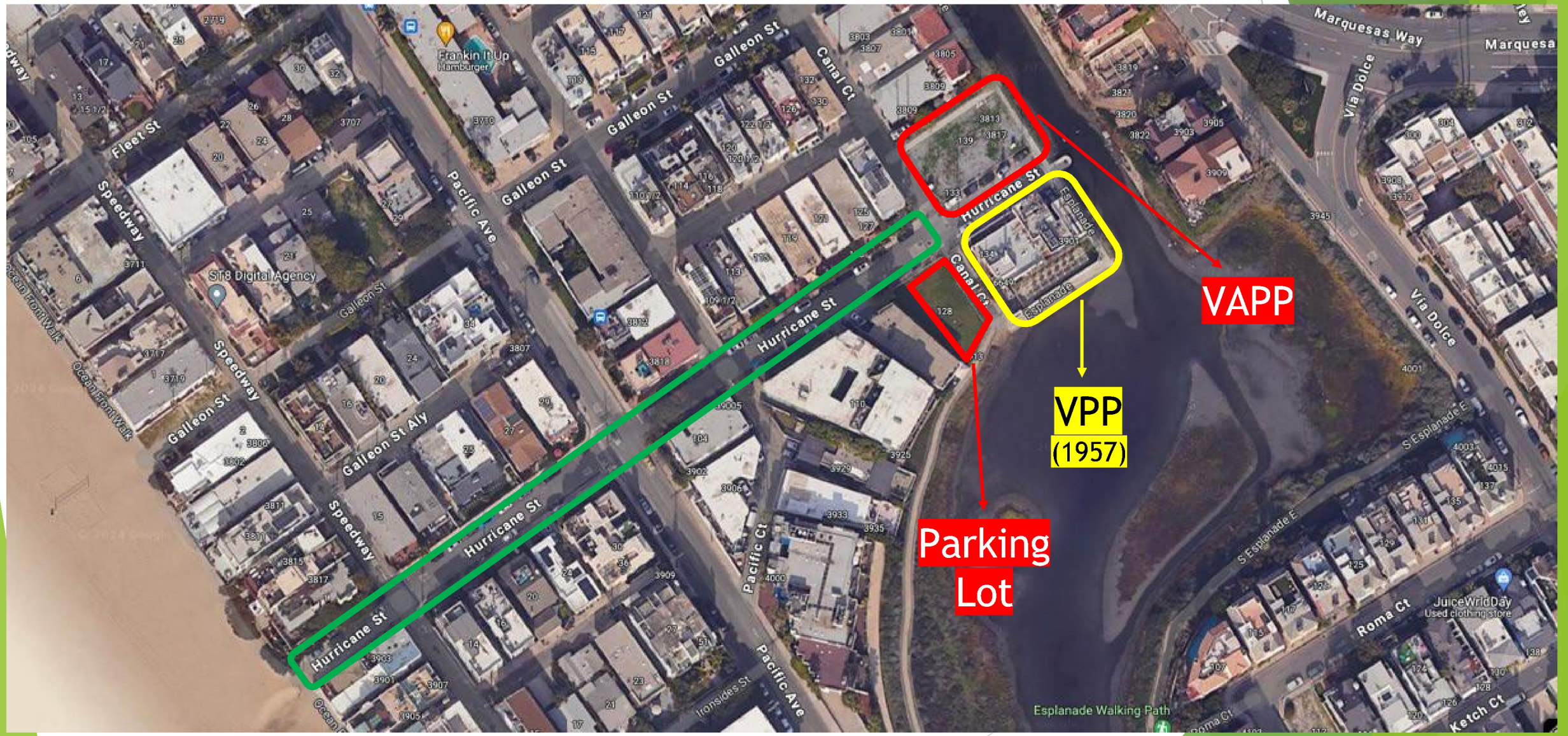
MDR – 1960 vs 2024





1957	1964	1967	1969	1977	1981	1993	1999	2017-2023	2025-2028??
• VPP Built	• 125 Hurricane	• 3933 Esplanade	• 113 Hurricane	• 3809 Grand Canal	• 110 Hurricane	• 109 Hurricane	• 120 Galleon	• Dual Force Main Project	• VAPP Project

MDR -2024


VAPP
VPP
(1957)
Parking
Lot
Hurricane St
Galleon St
Speedway
Pacific Ave
Canal Ct
Esplanade
Esplanade Walking Path
Marquesas Way
Via Dolce
Roma Ct
Ketch Ct
Fleet St
Galleon St Aly
Pacific Ct
Ironsides St
S Esplanade E
Frankin It Up
Hamburger
STR Digital Agency
JuiceWrldDay
Used clothing store

VNC Motion Timing – Why Now?

- Community fighting for fairness since 2017
- City approved
- Now at Coastal Commission
- Public Works arrogance
  - Required zoning changes from residential to public facilities
  - + General Plan amendment
  - City tried self-waiver
  - Coastal Commission said ”NO”



LA Public Works Arrogance

- LA - developer, owner, approver and project manager
  - "Our project, our rules"
- EIR
  - City initiated & approved the EIR
    - Certifying your own EIR is like auditing your company books – both do not pass the smell test.
  - Inaccurate & Insufficient ESHA plan
  - No independent analysis
  - No public notice for EIR addendum
- Planning Commission approval + required public outreach
  - Three meetings – Nothing, nada, zilch results

"This project has already been designed and it cannot be changed"

VAPP Motion Simplified

Critical infrastructure project - acknowledged.

Adverse impact on a high-density community.

Legitimate, concerted efforts to work with the community.

*"It's shocking that the City isn't **bending over backwards** to make certain that the impacts on the surrounding neighborhood and the ESHA…are significantly minimized."*
– Robin Rudisill

This motion supports a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions to these issues.

What Are The Primary Issues? (VNC motion)

- Non-conformance to Venice LUP (4 issues)
- Does not meet public benefit standards
- EIR does not adhere to court-mandated ESHA protections
- Violates LA CEQA noise threshold guidelines
- Inadequate emergency access
- Six-day vs five-day construction
- Lack of daytime parking for residents (25 cars)
- No real property protection from construction impact
- Unnecessary public parking lot @ 128 Hurricane
  - Acquired by eminent domain - $2.5M
- Inconsistent design with neighborhood properties
- Deficient maintenance plan (VPP & VAPP)

ESHA - Grand Canal



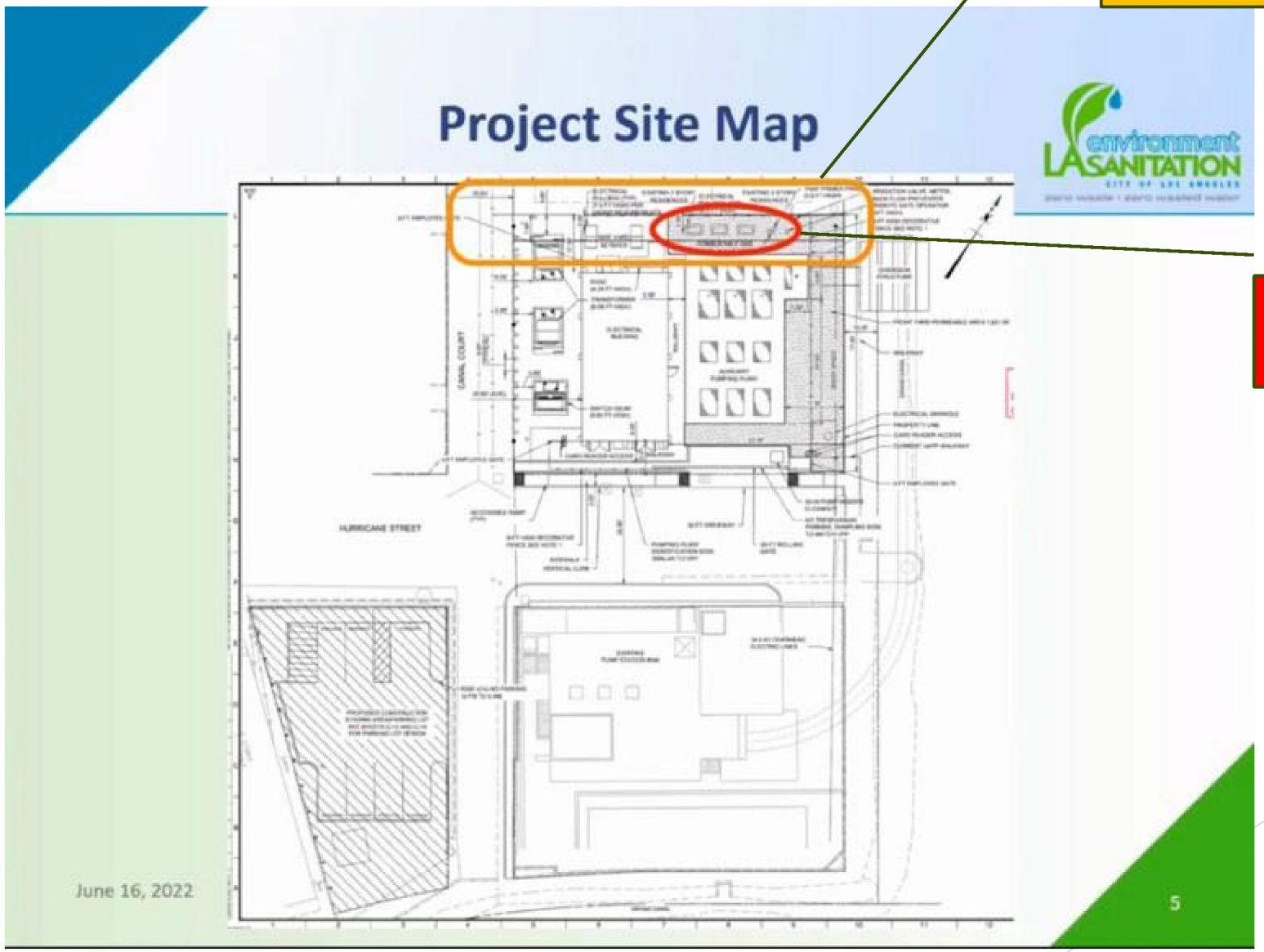
ESHA - Ballona Lagoon

Additional Impact – 3809 Esplanade/Gran Corso

- Initial design – 10’ buffer
  - Required per public benefit standards
- Later, city owned the buffer
  - Modified design – no buffer
- Former residents tried to dialogue with LAPW (2019-21)
- Appeal filed (2022)
- Property sold (2024)



No Buffer To Adjacent Residence



Zero property line to residence

Electrical Equipment

EIR: "Significant & Unavoidable Impacts

- *"Ground-borne vibration levels that are distinctly perceptible at a receiving residential use, or could potentially result in building damage"*
  - Offer pre-& post construction building inspections
  - City liability for damage (visible or not)?
    - Dual Force Main project - impact on Via Dolce condos
- Methane gas release (128 Hurricane)
  - *"Encroachment/seepage of methane into the VAPP structure so impacts are considered potentially significant"*
- Noise Levels: *Exceeds any of the construction noise criteria provided by the L.A. CEQA Thresholds Guide."*
- *"Will result in inadequate emergency access"*

EIR: Environmental Impact

- Grand Canal & Ballona Lagoon - U.S. Essential Fisheries Habitat Area
- *Loss of special status species or habitat"*
- *Loss or reduction of a locally designated natural habitat or plant community"*
- *"Alteration of an existing wetland habitat"*
- *"Significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment"*
- A court judgement has ruled the ESHA in the Grand Canal Lagoon must be protected –no heavy machines allowed in a previously considered "restoration."

Construction Noise

- EIR: *"Cumulative noise and vibration impacts during construction would also be significant and unavoidable."*
- EIR: *"Exceeds any of the construction noise criteria provided by the L.A. CEQA Thresholds Guide."*
  - *"Ambient noise levels at Receptor 2 by more than 5 dB CNEL, a potentially significant impact"*
- Impact to Residents
  - Work from home
  - Quality-of-life
  - Mental/physical issues
- This project will impact residents of the Silver Strand as well.

Additional Impact: Health & Wellness

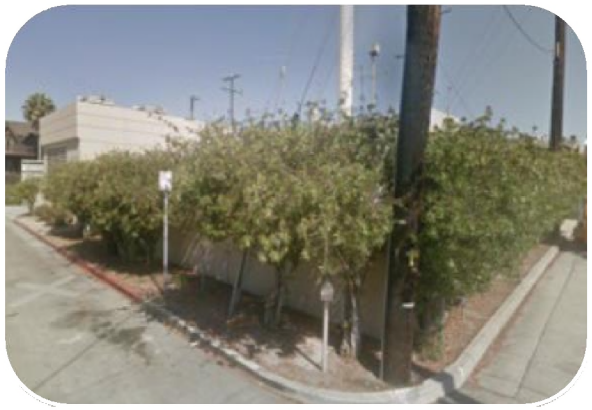
- Noise
- Dirt
- Resident mental/physical issues?
- Alternative work environments
- Weekday parking on Hurricane St – 25 spots
  - Beach visitor parking if six-day construction
- Community recourse to address construction issues?

Additional Impact – Property Value

- Compensation for lost property value?
  - Tenants – no street parking
  - Ask for reduced rents or move out
  - Units re-rented at lower rates, if at all
  - Property owners sell based on reduced valuations
  - “To bad, so sad”

VPP Maintenance Report Card

How can Public Works be trusted to maintain the VAPP based on their track record?



2012



2024



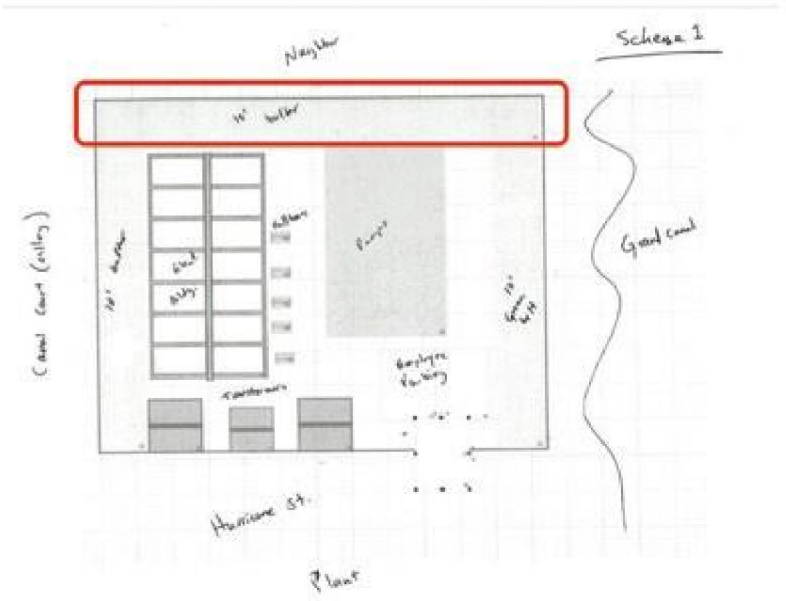
2024

Proposed Solutions

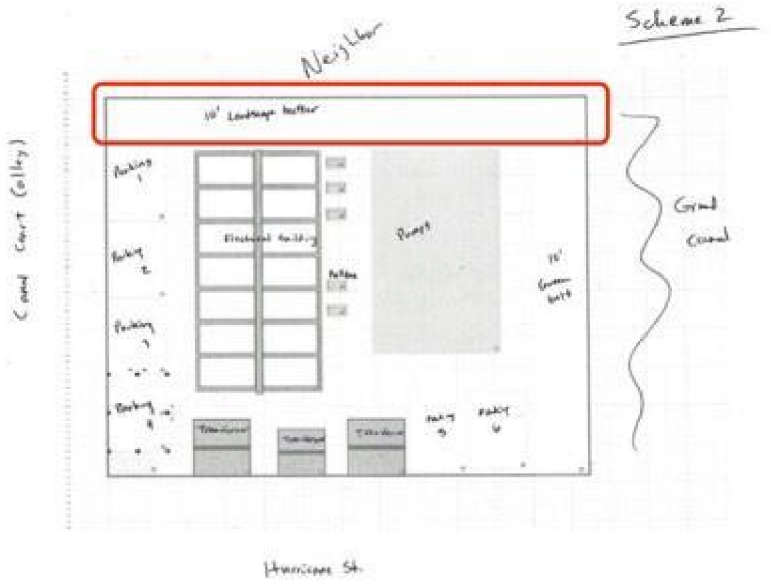
Required: 10’ Buffer

- 10’ buffer REQUIRED per public benefit standards
  - Compliance does not meet the purpose of the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5.
  - The cited performance standards apply to projects on a major or secondary highway, not a residential street

Scenario - Rejected



Scenario 2 - Rejected



Proposed: Environmental Solutions

"We're looking for a regional solution to VAPP issues"

- Christine Heinrich-Josties, Environmental Engineering Associate IV, LASAN

Grand Canal Restoration Project – Phase Two

- Community proposed. Public Works rejected. CD-11 exploring.
  - Comprehensive environmental solution
  - Driftwood St walk bridge – access & preparedness
  - Pedestrian walking path on Strongs Drive
  - Angled center of road parking on Via Dolce
  - Business benefits to Washington Square merchants

Proposed: Parking

One existing VPP parking spot

Currently used. Can hold 3-4 vehicles



Use 10’ setback for employee parking?

Can be a combination of public & restricted employee parking

Drawn orange lines represent potential city employee parking. There is NO need for a parking lot at 128 Hurricane.

Proposed: Binding Conditions of Approval

Currently: Limited Construction Company Accountability.
Currently: No City Accountability.

- Immediate response to construction issues
- City solution: Complain to on-site person then process
- How will this be monitored & enforced, with teeth?
- Penalties for non-compliance?

Proposed: Neighborhood Impact

- Five-day/week construction
  - No Saturday work except for emergency with prior approval + notice
  - Note: a city report produced 7 months after the EIR proposed five-day construction. This is not the current plan.
- More limited hours for loud noise work
  - Note: the same city report proposed 9a-3p for heavy equipment. This is also not in the current plan.
- Effective property protection from dirt, dust, damage
- Parking alternative for residents without garages
- Off-site workspace
- 3rd party approved emergency access plan
- Meaningful project design input.

The VAPP Project - Summary

The community acknowledges the VAPP is a necessary infrastructure project.

We continue to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions to these issues.

This motion supports these efforts.

Thank you

The Marina Peninsula community, especially the residents of Hurricane St and adjacent blocks, thanks you for your thoughtful consideration of these important issues.

"Many ideas grow better when transplanted into another mind than the one where they sprang up."

– Oliver Wendell Holmes

EXHIBIT O

SIERRA CLUB

Airport Marina Group

December 2, 2024

Los Angeles City Councilmember Traci Park
200 N. spring St. #410 Los
Angeles, CA 90012
councilmember.Park@lacity.org

Director and General Manager Barbara Romero
Los Angeles City Bureau of Sanitation and Environment
1149 South Broadway, Suite 900
Los Angeles, CA 90015
barbara.romero@lacity.org

Re: Proposed Venice Auxiliary Pumping Plant (VAPP)

Dear Councilmember Park and Director Romero:

While we are very supportive of making certain that there is sufficient capacity and adequate working order of the wastewater treatment mechanisms in Los Angeles, we have serious concerns about the potential impact of the proposed Venice Auxiliary Pumping Plant (VAPP) and wish to make sure that this biologically important area of the Los Angeles coast is wellprotected. We note too that the Venice Neighborhood Council shares our concerns, motion attached.

To be clear, we do not oppose an environmentally sensitive overhaul and expansion of the Venice Pumping Plant, but we urge you to use the power and authority of your offices to ensure that adequate mitigation efforts are fully considered and addressed before this proposed project is presented to the Coastal Commission.

After hearing from our own members in the community, as well as other environmental advocates, we do not think this proposed project has adequate mitigations for the environmental harm it may cause. We urge you to meet with representatives of Sierra Club, Venice Neighborhood Council, and other environmental leaders.

This area is of continuing importance to the Sierra Club. Sierra Club was involved in litigation against the Coastal Commission (and the City as real party in interest) approximately 20 years ago for a project that included this same area - the Ballona Wetlands Grand Canal Lagoon area. We prevailed (with the assistance of a Judge) in helping the City choose an environmentally superior project than they had originally proposed. The City (with leadership from Councilmember Rosendahl and Mayor Villaraigosa) then worked with the community to bring back important biodiversity to the area, while beautifying a walk path for residents and visitors. Phase Two of this effort was left uncompleted due to lack of funding from the City, even though there was state grant funding offered for it. The Phase Two plans were wellconsidered by the community and are still on the City of Los Angeles' Bureau of Engineering's website. Please review them, and Recommended Alternative #1, at https://engineering.lacity.gov/grand-canal-restoration-proiect

Specifically, the work now proposed would cause harm to the ESHA (Environmentally Sensitive Habitat Area) of both Grand Canal Lagoon and Ballona Lagoon Marine Preserve, which is unacceptable unless there is sufficient mitigation to make up for the damage. Leaders in the community have suggested that the Phase Two plans for the Ballona Wetlands Grand Canal Lagoon restoration be undertaken by the community and funded by the City's Sanitation and Environment Department — as mitigation for the environmental damage that is anticipated by the pumping plant overhaul and expansion. This might also include installing one or two walk bridges over the lagoon — which would help to make up for public access issues this project would impact.

Please contact me to set up a meeting so these important environmental issues can be resolved. Thank you.

Sincerely,



Susanne L. Cumming, Esq.
CA State Bar #137426
Conservation Chair, Airport Marina Group
Sierra Club cumming@earthlink.net
310-962-3341

Copies:
Los Angeles County Supervisor Holly Mitchell (HollyJMitchell@bos.lacounty.gov) Venice Neighborhood Council President Brian Averill (brian.averill@venicenc.org)
Venice Field Deputy Sean Silva (sean.silva@lacity.org)
Venice Council Member Steve Bradbury (steve@mycyberstuffcom)

Attachments:
Venice Neighborhood Council Motion and Motion Background

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Copies:
Los Angeles County Supervisor Holly Mitchell (HollyJMitchell@bos.lacounty.gov)
Venice Neighborhood Council President Brian Averill (brian.averill@venicenc.org)
Venice Field Deputy Sean Silva (sean.silva@lacity.org)
Venice Council Member Steve Bradbury {steve@mycyberstuff.com)

Attachments:
Venice Neighborhood Council Motion and Motion Background

Exhibit P - Kenya Lee Attorney Letters to Coastal Commission (2)

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Balzer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice in Washington

July 25, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jennifer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant – August 14 agenda items 16a, 16b, and 17a

Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade, *immediately adjacent* to the proposed Venice Auxiliary Pumping Plant (VAPP). As designed and approved by the City, the proposed industrial facility would have *zero setbacks* from Ms. Lee's property, with large structures housing electrical cabinets constructed within the sideyard setback area along the property line. This project is not ready for review by the Commission: **A zone change application is necessary to rezone the site from residential to public facilities, and the pending application has not been brought for public hearing.** Moreover, the project's approval would violate policies of the Coastal Act, of the Venice LUP and Coastal Zone Specific Plan, and would rest on an inadequate review under the California Environmental Quality Act.

This project will impact ESHA, as the City proposes to construct in one of the few unlined waterways directly connected with the Pacific via the Ballona Lagoon. The proposal would place an additional industrial facility that would handle the sewage of millions of residents without even providing the minimal standard sideyard between that facility and our client's home. The

proposal's environmental impacts on ESHA and on our client are significant, and adequate mitigation has yet to be provided or proposed.

Coastal Act Policies

The project does not conform to the following Coastal Act policies:

> *Section 30253 (a): Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *Section 30253 (b): 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.*

The project is located in area that is known to be vulnerable to sea level rise, flooding and liquefaction. The City relies on the Marina del Rey tide gate's operation to prevent sea level rise in the Ballona Lagoon, but such reliance presumes continued maintenance and operation of those manmade devices. The City's approval acknowledges that extreme flooding or malfunction of the flood gate could lead to flooding of this facility, but does not disclose the impacts of such potential flooding on the environment.

> *Section 30260: (a) Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division.*
>
> *(b) Notwithstanding subdivision (a), where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if all of the following conditions are met:*
>
> *(1) Alternative locations are infeasible or more environmentally damaging.*
>
> *(2) Permitting the development would not adversely affect the public welfare.*
>
> *(3) Adverse environmental effects are mitigated to the maximum extent feasible.*
>
> *(4) The new or expanded coastal-dependent industrial facility is not an oil and gas development, refinery, or petrochemical facility.*

New industrial uses like the VAPP that depend on being near the coast can *only* be approved if "adverse environmental effects are mitigated to the maximum extent feasible." The City has not

completed habitat mitigation long-promised for the Ballona Lagoon, and the (out-of-date) Environmental Impact Report (EIR) discloses impacts to neighboring residents from the construction and operation of the VAPP. The Commission must require the City to go beyond what it has committed to and mitigate "to the maximum extent feasible."

> *Section 30230: Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*
>
> *Section 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*
>
> *Section 30240:*
>
> *(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
>
> *(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

The VAPP does not comply with the above policies, given its location adjacent to the Grand Canal and Ballona Lagoon, as well as the direct impacts on the Grand Canal to construct the subsurface piping components and sluice gates. The project's EIR acknowledges that Southern Coastal Salt March occurs within the area that will be disturbed by the project.

Venice Coastal Zone Land Use Plan Policies

> *Policy I.A.i .b: "preserve the nature and character cf existing residential neighborhoods" "No more than two lots may be consolidated in the Ba/Iona Lagoon West, Ballona Lagoon (Grand Canaı) East ... "*

VAPP alters, and do not preserve, the residential character. By expanding the existing facility onto three vacant lots, the City's plan violates the LUP policy regarding lot consolidation.

> *Policy I.A.7.b. Multi-Family Residential -Low Medium 11 Density - Ballona Lagoon and Grand Canal West Bank Prcperties North cf ironside*

The LUP requires "minimum side yard of3 ½ feet." The City approved a project that does not provide a minimum side yard in violation of the LUP.

> *Policy I.D.i: Canals and Ballona Lagoon Walkways. Acjacent Use/Develcpment: "The only permitted develcpment acjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or suıface public parking lots, maintenance activities and emergency repairs ..... New construction along the Canals and Ballona Lagoon shall comply with standards for setbacks, noise barriers, pervious suıfacing with drainage control measures to filter storm run-cıf and direct it away from environmentally sensitive habitat areas, bu,,fer areas in permanent open space, land dedication for erosion control, and wetland restoration including cıf site drainage improvements.*

The VAPP does not comply with this policy because it is not of the type of permissible permitted development, and does not utilize the correct setback from neighboring residential properties.

> *Policy IV.B.7. Grand Canal Rehabilitation. The Grand Canal between Hurricane Street and Washington Boulevard shall be restored and maintained in order to improve water qualiıy, aquatic habitat, and public pedestrian access along the waterway in a manner that is sensitive to the privacy cf acjoining residents.*

> *Policy V. A. 3. ir,frastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible.*

Both of the above policies require significant limitations on projects like the proposed VAPP that would impact the habitat in the Grand Canal.

Venice Coastal Zone Specific Plan

Section 10.A.2 (b)(4): The sideyard shall be consistent with LAMC requirements but shall not be less than 3 ½ feet

Section 11.B.4 Building Separation. A minimum of five feet shall be provided between commercial and residential buildings.

As set forth above, the zero yard setback in the north sideyard is in violation of these policies which require setbacks.

California Environmental Quality Act
The EIR for this project was completed in 2017, but failed to disclose that habitat for the El Segundo blue butterfly (the sea cliffbuckwheat) was planted in the area south of Washington Boulevard as part of the Grand Canal restoration. The area is included in the El Segundo blue butterfly US Fish and Wildlife Service Recovery Plan for the species. In addition, several Special Status species -- wooly seablite, southwestern spiny rush, and red sand verbena-were present in the project area, and the EIR provides inadequate mitigation for the potential loss of these species.

Conclusion

This project is not ready for the Commission's consideration, because the City has not yet completed the legislative process of changing the project's zoning to permit this public, industrial, use. There is no reason to place this item for consideration now. Moreover, the proposal authorizes development activity that could detrimentally affect the Grand Canal and Ballona Lagoon habitat areas, and which does not comply with basic and important zoning protections for neighboring residents. Please require the City to completely mitigate environmental impacts and to respect the zoning rules it committed to in the LUP and Venice Coastal Zone Specific Plan.

If the Commission permits the project to proceed, it must mitigate the impacts of the project both on the natural resources in the Grand Canal and Ballona Lagoona, and on neighboring residents, including most plainly Ms. Lee, who will be subjected to unwanted noise and air quality impacts. The EIR concluded that construction noise and vibration impacts would be significant and unmitigated. In fact, the EIR found that the proposed pile driving would exceed the thresholds for potential vibration damage at nearby structures. The Commission should require the City to take all measures to mitigate these impacts. The Mitigation Monitoring Program includes a requirement that the City "work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours. The space would ideally have internet service and meeting room space." (BMP NOI-1.) More than needing space during the day, a family like Ms.

Lee's with a young child needs more permanent off site relocation during the construction process. This project serves many, but Ms. Lee is bearing nearly all of the impact of the construction. This need not be the case.

I am available to discuss this matter at your convenience.

Yours truly,

Beverly Grossman Palmer
Strumwasser & Woocher LLP

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Perez
Julia Michel t
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

t Also admitted to practice
in Washington

November 25, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jennifer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant

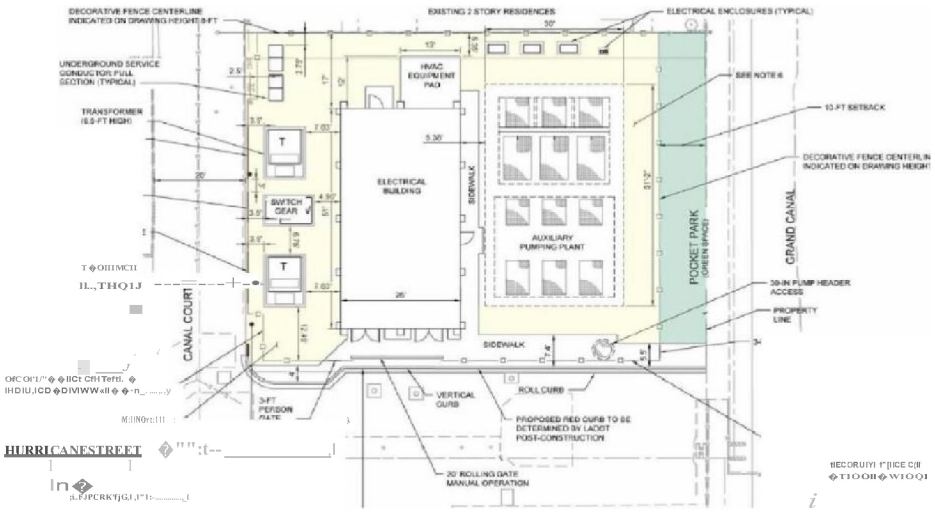
Dear Ms. Doyle:

This firm writes on behalfof Kenya Lee, the owner of the residential property located at 3811 Esplanade. Thank you for speaking with me about the proposed Venice Auxiliary Pumping Plant project last week. This letter follows up on that conversation, in which you asked about the project's environmental impacts on Ms. Lee, one of the closest (if not the closest) neighboring residents. The purpose of this letter is to provide more specific examples of the impact on Ms. Lee, including where the impact may be greater than identified in the EIR due to design changes since the EIR's introduction.

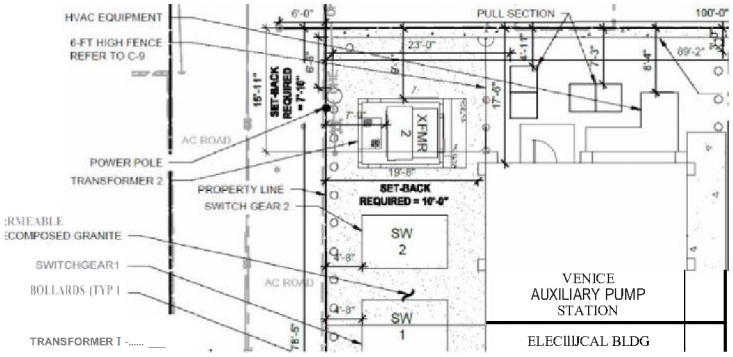
Operational Noise Impacts: Likely Impact For Ms. Lee Due to Design Change

You provided me with July 2025 site plans subsequent to our call. I have compared the July 2025 site plan with the plan included in the 2017 EIR. There is at least one notable change directly relevant to Ms. Lee, which I would like to bring to your attention. The project includes two electrical transformers which are located on the western edge of the property. At the time the project was analyzed in the 2017 EIR, the northern most transformer was located at some distance from the northern property line. The distance is not depicted on the site plans, but based

on the scale on the plans in the EIR (Figure ES-3), it appears to be roughly 30 feet from the property line. The EIR reports that the distance between the northern transformer and sensitive Receptor 2 (Ms. Lee's residence) is 27 feet. (See Table 3.9-16, page 3.9-28.) An excerpt of the EIR site plan is included below for reference.



In comparison, the location of the northern transformer has shifted meaningfully to the north - **and closer to Receptor 2 (Ms. Lee)** on the July 2025 site plans. On the July 2025 plans, a distance of approximately 9 feet between the northern transformer and the northern property line is depicted. This is **three times closer** than analyzed in the EIR.



The new location of the northern transformer is especially concerning given the noise analysis in the EIR **at** the northern transformer's original location. Has the City been asked to provide an updated noise analysis for this impact? If not, it should be requested to do so.

The original 2017 EIR concluded that operational noise from the transformers (combined) at Receptor 2 (Ms. Lee) would increase noise levels by 2.1 to 3.9 dB over the ambient background noise levels. The threshold of significance in the EIR is an increase of 5 dB over ambient.

Given that the northern transformer has been located three times closer to Receptor 2 (Ms. Lee) than was analyzed, it is likely that operational noise impacts have increased, and most likely have become significant. In general, change in noise volumes due to distance from a point source like the transformer is calculated using the inverse square law. The formula would be:

56.3 dB= 41.4 dB - 20 * log10 (9/50)

This is far greater than the noise level used in the EIR's calculations of 46.8 dB, and would be cumulated with other operational noise. Given the total noise increase predicted at Receptor 2 (Ms. Lee) was not far from the 5 dB cutoff, the analysis must be re-done with proper noise distances. As I calculate it, the total increase over CNEL will be 11.2 dB, but the Commission should require the City to perform this analysis prior to considering the project.

MM-NOI-3 requires the City to reduce the overall operational noise to within SdB of the existing community ambient noise levels using design features. (EIR, p. 3.9-31.) The Commission should require the City to explain how relocating the transformers *closer* to Ms. Lee's property is consistent with MM-NOI-3, and what design features have been incorporated to ensure that the overall operational noise, as mitigated, does not increase the operational noise impacts above the threshold of significance at Ms. Lee's residence. As the proponent of the project, the onus should be on the City to prove that it is actually going to mitigate the operational noise, even after altering the project that was analyzed in the EIR.

Other Construction Impacts for Ms. Lee: Significant and Unmitigable

The EIR concluded that that several impacts from the project were significant and unavoidable. These include construction noise, with impacts that would extend for the entirety of the two-year construction period. Pile driving, grading, and jackhammer activities would be particularly disruptive. The pile driving is predicted to result in a 44 dB increase over ambient noise levels at Receptor 2 (Ms. Lee), with volumes reaching 98 dB. (See EIRp. 3.9-21.) While pile driving is the loudest, demolition, paving, and site preparation all involve noise volumes with enormous increases over ambient noise levels.

Sounds levels exceeding 85dB are considered harmful. Every 3 dB rise over 85 dB reduces the safety by half. 85dB is a safe exposure for 8 hours, but at 91 dB, the safe exposure period is only two hours. (See htq.s://www.asha.orgLpublic/hearing/loud-noise-dangers/?srsltid=AfmBO045h-Gug3IPEc3un8s5p76Umz05jZkxrnh5M-I-7zeTeiTz7EK2j.) A noise level of98 dB at Ms. Lee's during pile driving would be unsafe at any duration. Ms. Lee and her young child cannot safely remain in their home during this type of construction.

In addition, Receptor 2 (Ms. Lee) would experience significant vibration impacts during most construction phases, with vibration levels ranging from 0.022-1.781 in/s PPV (page 3.9-23). Building construction with pile driving would exceed both the annoyance threshold (0.04 in/s) and potential damage threshold (0.3 in/s) at this location (page 3.9-23).

Also of grave concern to Ms. Lee are the dust and particulate matter emissions during construction. With a young child resident in the neighboring home, the dust and particulate matter accompanying construction are a major issue. During construction phases including site preparation, excavation, and shoring, 48 haul trips a day will take place next to her home, on a narrow street not designed for frequent truck traffic.

All of these impacts will greatly interfere with Ms. Lee's ability to enjoy and reside safely in her property with her family. Ms. Lee and her family should not be the only ones burdened by the construction of this public facility.

Environmental Justice

As a community, Venice has been through periods of economic decline. In the 1950s, Venice was considered the "slum by the sea," which may in part explain the original Venice Pumping Plant being located on the shores of the Grand Canal and adjacent to Ballona Lagoon. In the 1930s, this area was considered of poor quality and the area around the VAPP was redlined as a "Grade D." It is likely the legacy of these attitudes that lead this neighborhood to host the pumping plant for sewage from the much of the westside of Los Angeles. The burden of addressing the additional sewage needs of the city will now fall on this community again, most notably during the construction of the VAPP. The Coastal Commission should ensure

environmental equity by requiring the City to fully mitigate the impact of construction on the most directly impacted residents, including Ms. Lee.

I am available to discuss these concerns at your convenience.

Yours truly,

Beverly Grossman Palmer

Exhibit Q - Additional Supporting Administrative Record Materials

The following Plants are examples of

Hyperion Water Reclamation Plant

Notice the extensive industrial campus layout, perimeter separation, utility corridors, and disce from immediately adjacent residential structures.







WATER
RECLAMATION PLANT



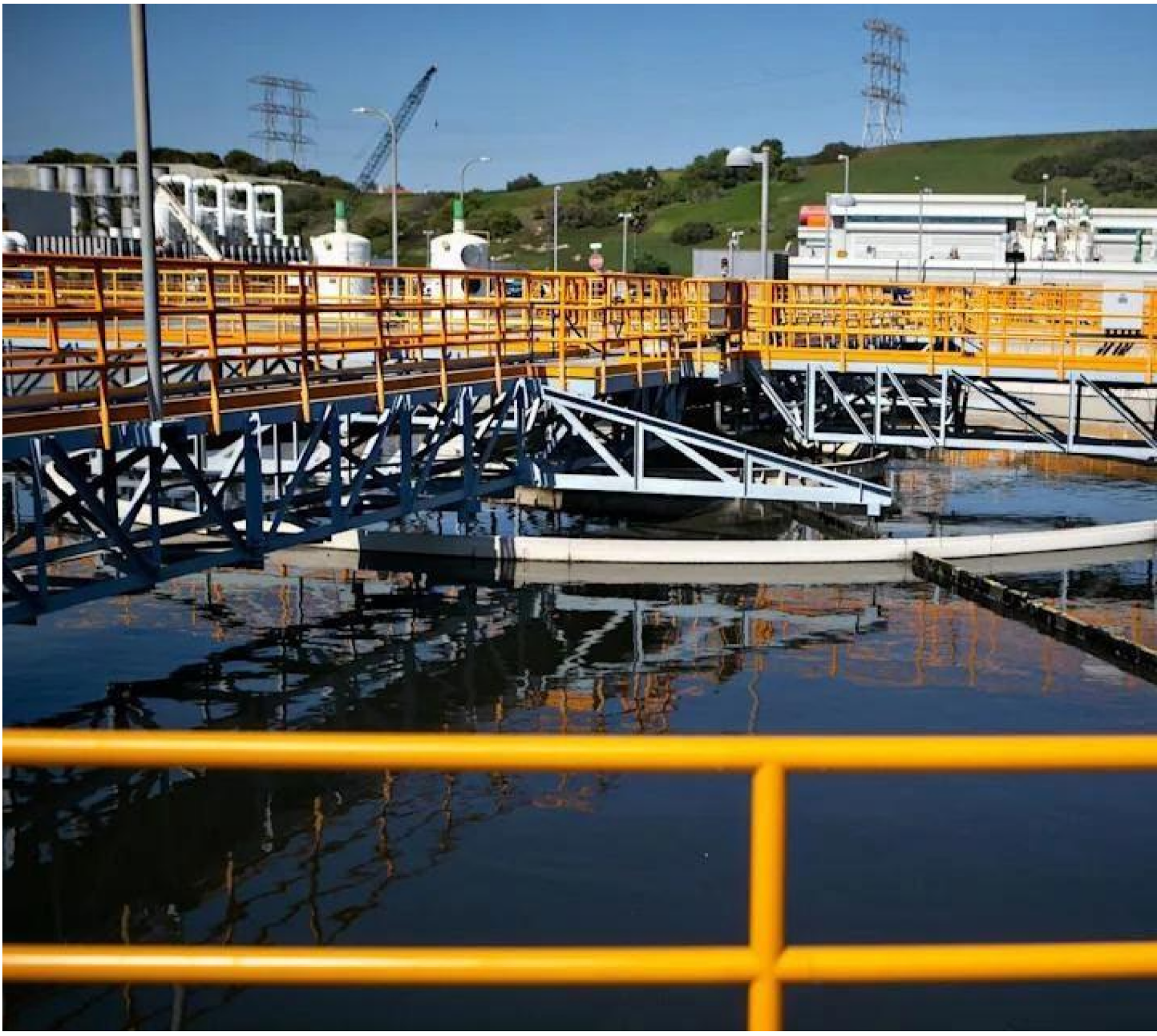


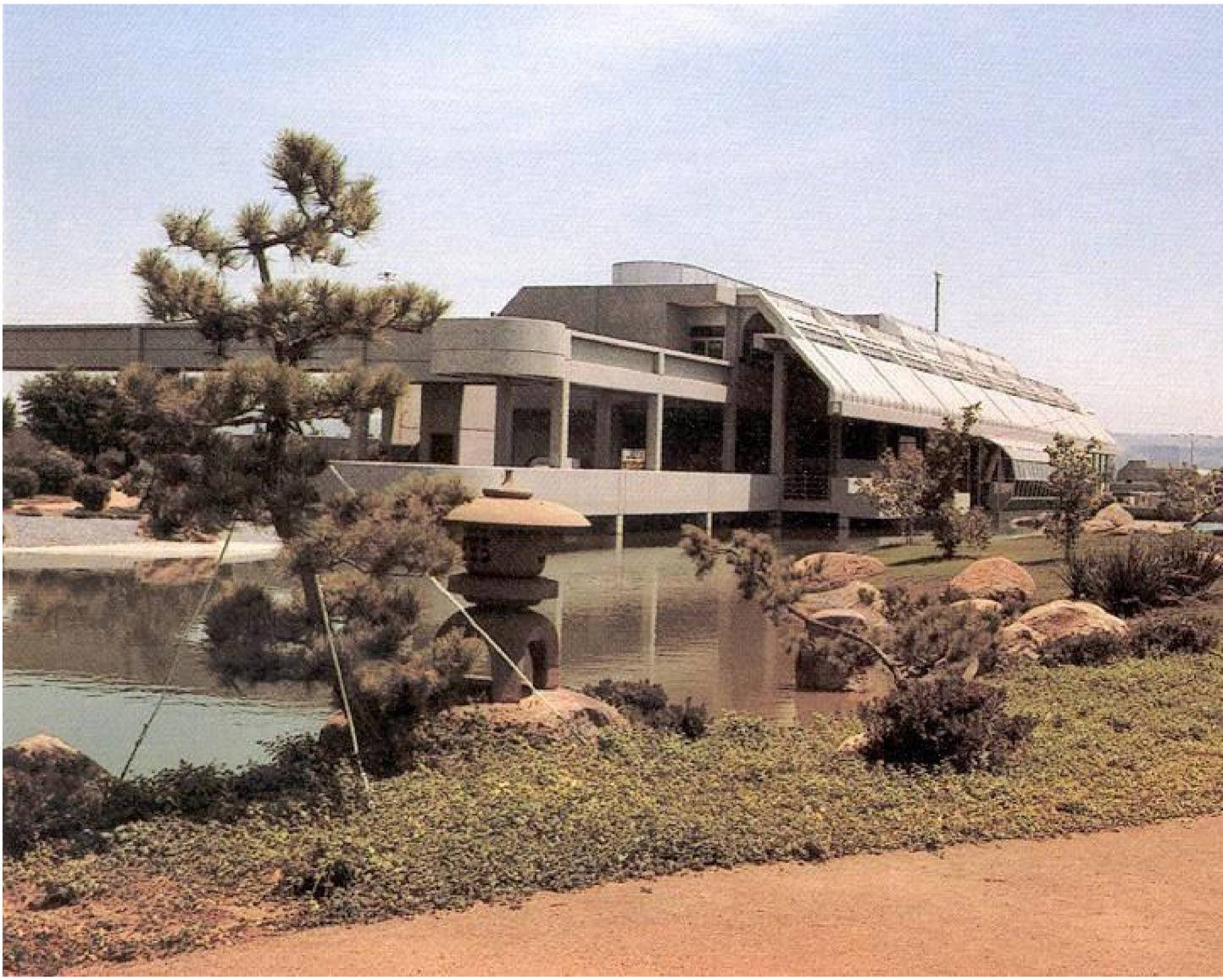
Donald C. Tillman Water Reclamation Plant

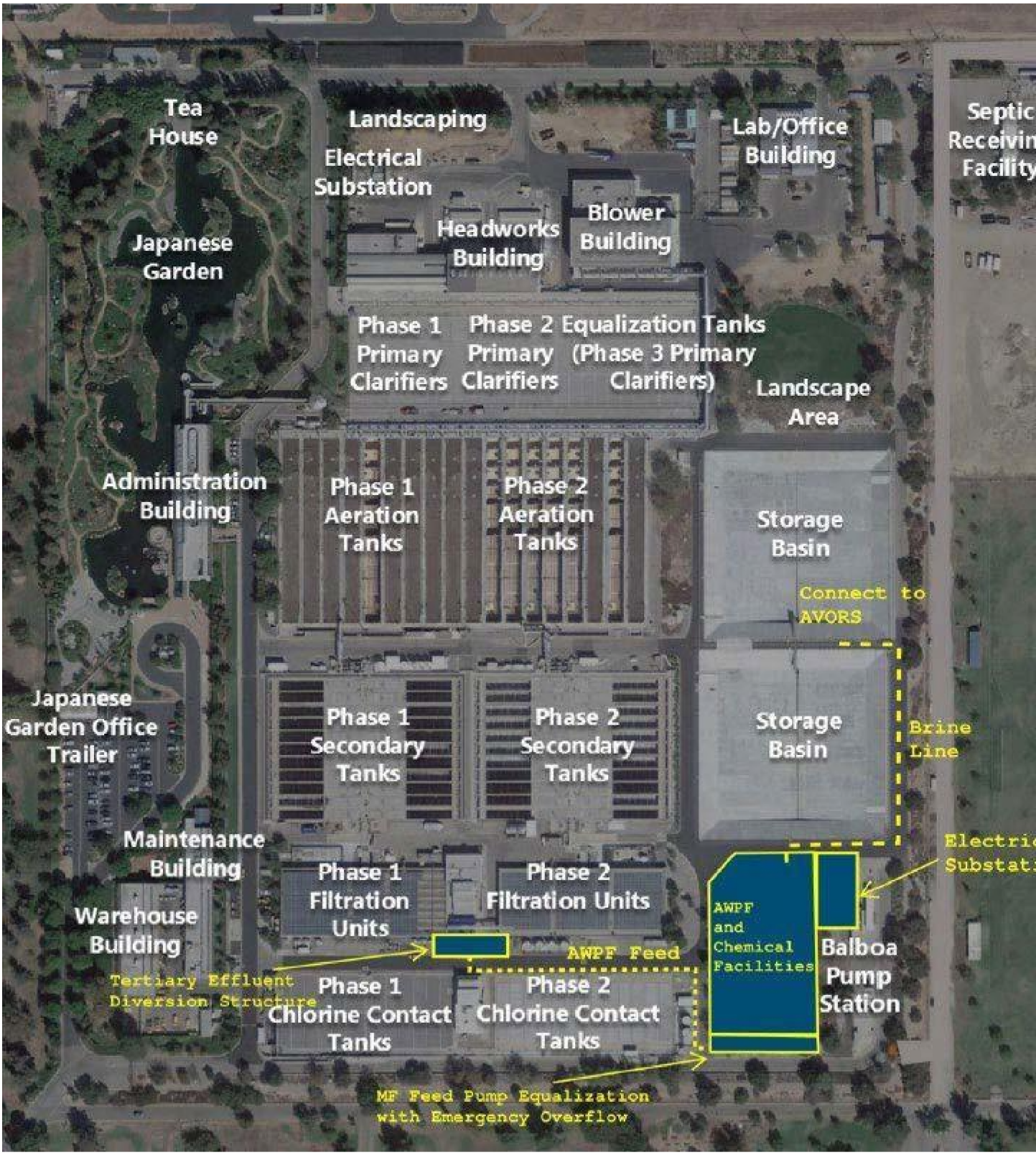
These images demonstrate landscaped perimeter treatments, roadway separation, fencing, and broader utility-campus transitions separating operations from nearby residential occupancy.











The Donald C. Tillman Water Reclamation Plant is substantially buffered from adjacent residential occupancy through landscaped perimeter treatments, roadway infrastructure, fencing, operational setbacks, and transitional land use separation measures.

Terminal Island Water Reclamation Plant

These examples help demonstrate that large-scale sanitation and wastewater infrastructure is commonly concentrated within industrialized port and utility zones rather than directly adjacent to occupied coastal residential homes.







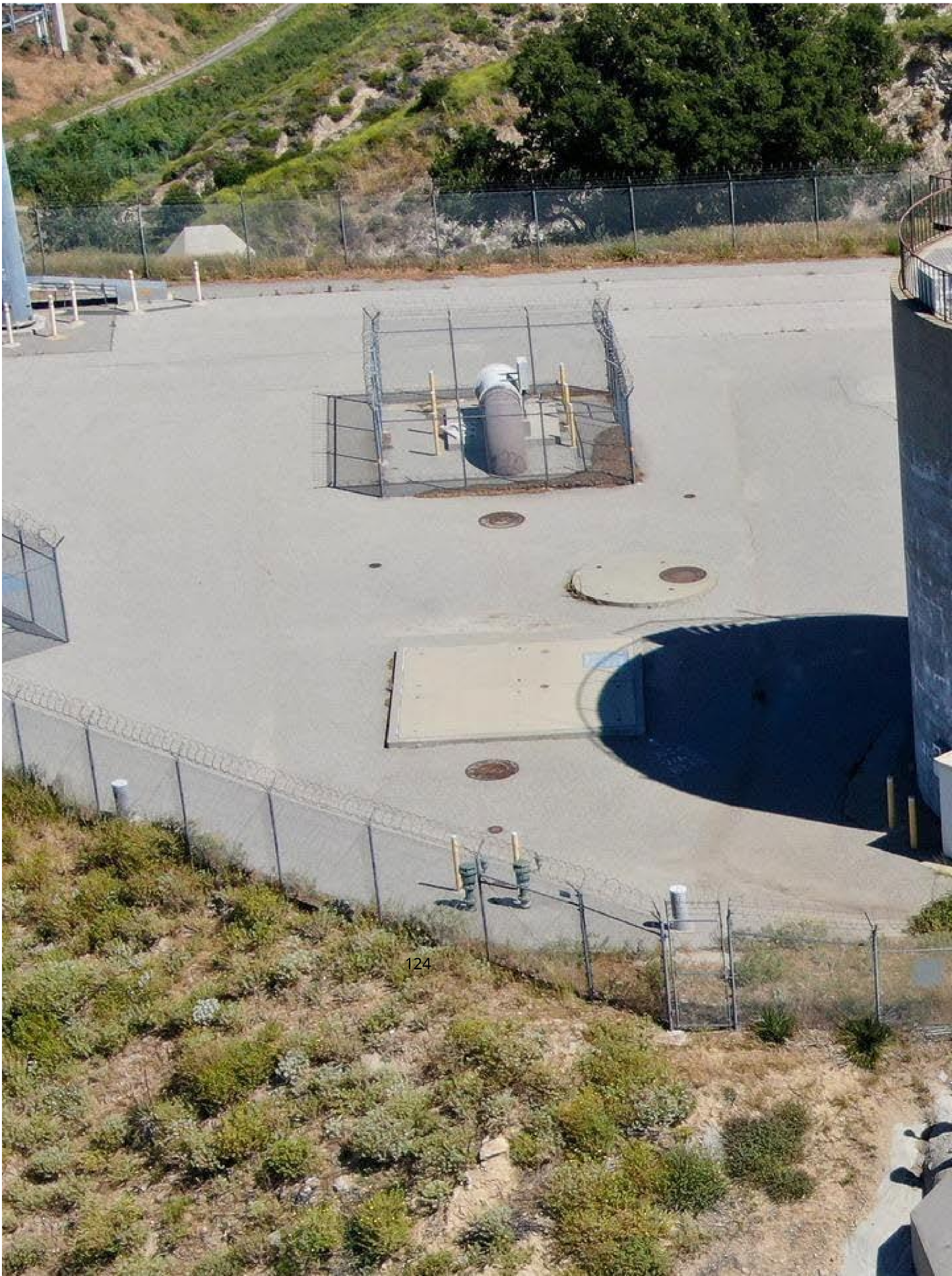




Wastewater and sanitation infrastructure associated with the Terminal Island area is generally concentrated within industrialized port and utility corridors rather than immediately bordering occupied residential properties without meaningful transitional separation.

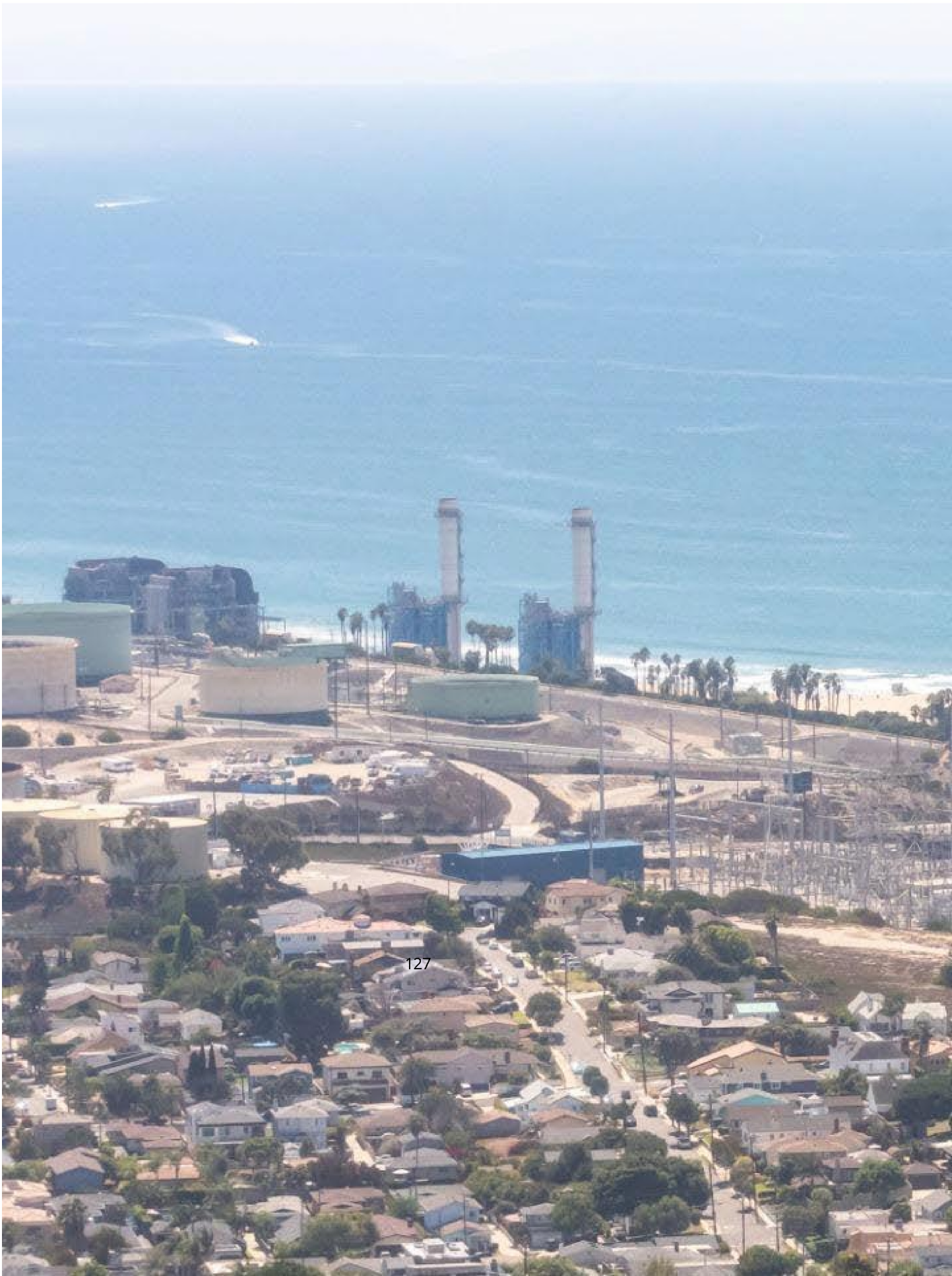
Los Angeles-Glendale Water Reclamation Plant

These examples show utility infrastructure separated through fencing, setbacks, utility corridors, roadway transitions, and industrial-adjacent siting conditions.













setbacks, fencing, roadway infrastructure, and operational buffering conditions absent from the proposed VAPP project.

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: MAY 7, 2026

Case No.: CPC-2024-2010-GPA-ZC-CU3-SPPC Council District: 11 – Park
CEQA: SCH No. 2015111038;
Venice Auxiliary Pumping Plant (VAAP) Project EIR
Plan Area: Venice

Project Site: 128, 133 & 139 East Hurricane Street;
3817 & 3813 South Esplanade; 3913 South Esplanade West

Applicant: Christine Heinrich-Josties, Department of Public Works: LA Sanitation and Environment
Representative: Benét Gardner, P.E., Department of Public Works: Bureau of Engineering

At its meeting **January 22, 2026**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

Construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The Project includes an amendment to the certified Venice Local Coastal Program Land Use Plan map, to re-designate the subject site from Low Medium II Residential to Public Facility and related text change.

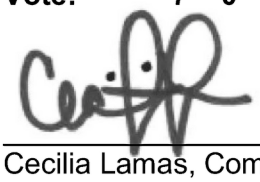
1. **Found**, the Project was assessed in the Venice Auxiliary Pumping Plant Environmental Impact Report SCH No. 2015111038 certified on August 8, 2017; and pursuant to CEQA Guidelines 15162 and 15164, and the Addendums dated October 29, 2021 and June 2024, no major revisions are required to the EIR and no subsequent EIR or negative declaration is required for an approval of the Project;
2. **Approved** and **recommended** that the Mayor and City Council **adopt** the attached Resolution, pursuant to City Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), for a General Plan Amendment to amend:
   a. Venice Community Plan General Plan Land Use Map to amend the land use designation of the subject site from Low Medium II Residential to Public Facility;
   b. Certified Venice Local Coastal Program Land Use Plan (LUP) map to amend the land use designation of the subject site from Low Medium II Multiple Family Residential to Public Facility; and
   c. Certified Venice Local Coastal Program Land Use Plan (LUP) to amend related text to facilitate the Proposed Project;
3. **Approved** and **recommended** that City Council **adopt** the attached Zone Change Ordinance, pursuant to LAMC Chapter 1A Section 13B.1.4, a Zone Change from RW2-1 to PF-1;
4. **Approved**, pursuant to LAMC Chapter 1 Section 12.24 U.21, a Class 3 Conditional Use Permit to allow a pumping plant and a surface parking lot within the PF Zone;

5. **Approved**, pursuant to LAMC Chapter 1A Section 13B.4.2, a Project Compliance for a project located within the Ballona Lagoon West Subarea of the Venice Coastal Zone Specific Plan;
6. **Adopted** the attached Modified Conditions of Approval; and
7. **Adopted** the attached Findings.

The vote proceeded as follows:

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

Vote: 7 – 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 General Plan Amendment is not appealable and will proceed to the City Council for final decision. The Zone Change is appealable by the Applicant only if disapproved in whole or in part by the Commission. The remaining entitlements are appealable to City Council within **20 days** after the mailing date of this determination letter. Any appeal not filed within the 20-day period shall not be considered by the Council.

FINAL APPEAL DATE: MAY 27, 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 on the CEQA clearance is an appealable clearance under Section 13F.11.1.F.2. (EIR, ND, MND, SCEA, Exemption/No Project) made by a decisionmaker other than the City Council; all available appeals on the entitlement approval(s) have been taken; and the Determination on the entitlement(s) is final and not further appealable.

WHO CAN FILE AN APPEAL

An applicant or any other person aggrieved by the Decision Maker's decision may file an appeal.

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.

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: Zone Change Ordinance, Maps, Modified Conditions of Approval, Findings, Resolution

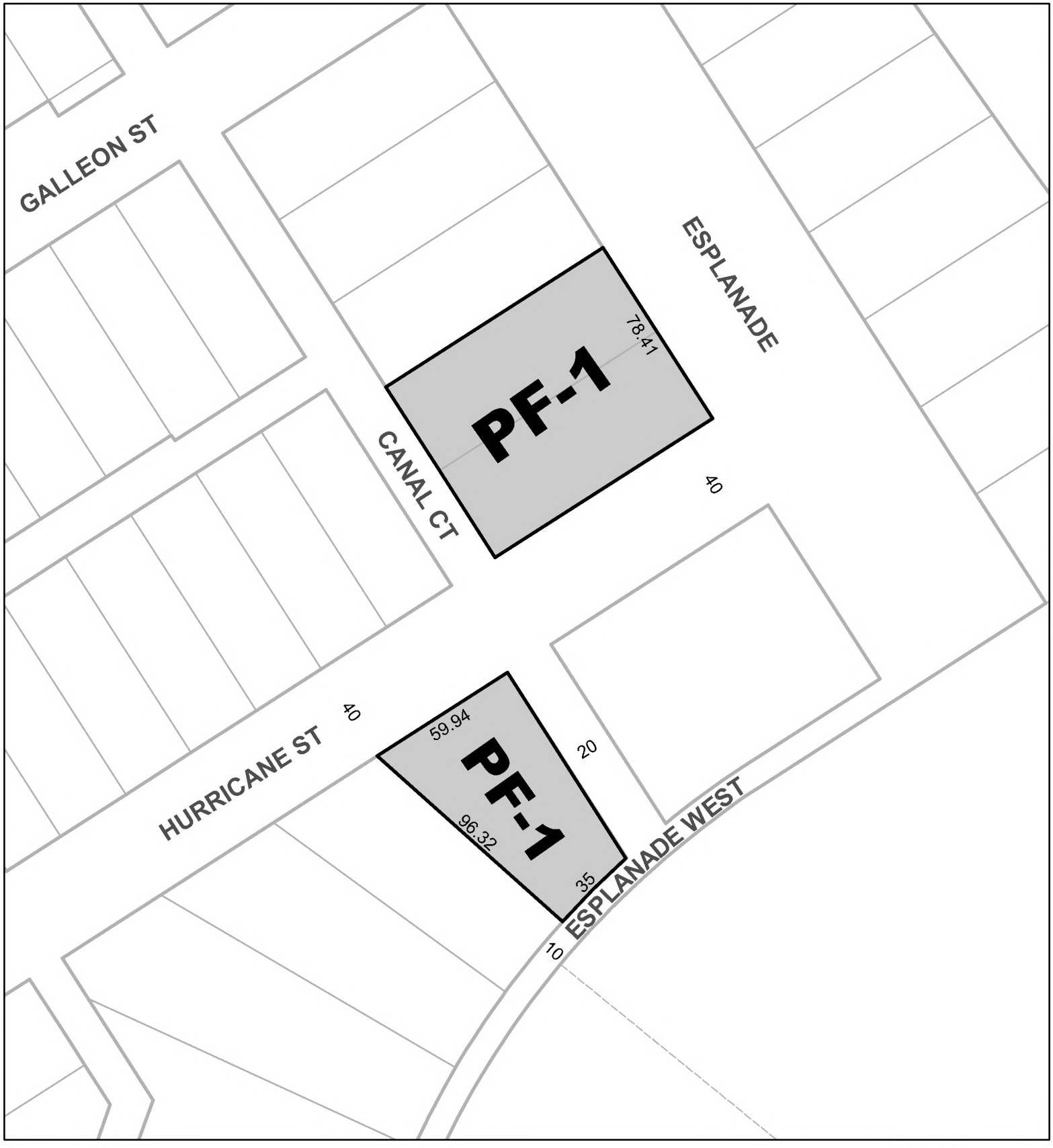
cc: Sarah Molina-Pearson, Principal City Planner
Juliet Oh, Senior City Planner
Ira Brown, City Planner

ORDINANCE NO. _____

An ordinance amending Section 12.04 of the Los Angeles Municipal Code by amending the zoning map.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 12.04 of the Los Angeles Municipal Code is hereby amended by changing the zone and zone boundaries shown upon a portion of the zone map attached thereto and made a part of Article 2, Chapter 1 of the Los Angeles Municipal Code, so that such portion of the zoning map shall be as follows:



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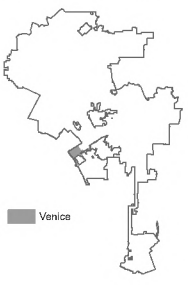
Feet

CPC-2024-2010-GPA-ZC-CU3-SPPC

AA/Cf 013125

City of Los Angeles



Data Sources: Department of City Planning & Bureau of Engineering

CONDITIONS OF APPROVAL

(As Modified by the City Planning Commission at its meeting on January 22, 2026)

1. Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and 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. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.

3. **Coastal Zone.** The project is subject to Coastal Development Permit 5-24-0123 issued by the California Coastal Commission and any subsequent amendments.

4. **Height.** Within 60 feet of the mean high tide of the Ballona Lagoon or inland side of the Esplanade (City right-of-way), whichever is furthest from the water as determined by a licensed surveyor, Venice Coastal Development Projects shall not exceed a maximum height of 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet. As shown in "Exhibit A", the project provides a height of 30 feet commencing at 60 horizontal feet from the Esplanade property line with an encroachment plane to a building height of 32 feet; height shall be measured from the average existing natural grade

5. **Canal Setback and Permeable Yard.** The project shall provide an average setback of 15 feet, but not less than ten feet from the lot line nearest to the water. An open, permeable yard with an area of at least 15 times the lot width and a minimum area of 450 square feet shall be maintained between the property line that faces the water and the front of any structure. No building extensions, including stairs and balconies, shall be allowed in the required Permeable yard area, except for ground level Permeable decks that do not exceed 18 inches in height. The combined height of any decks, railings, garden walls, and fences situated within the required Permeable yard shall not exceed six feet above the elevation of the adjacent public walkway. As shown in "Exhibit A", the project provides 2,921 square feet of Permeable yard adjoining Grand Canal and 1,074 square feet of Permeable yard adjoining the Ballona Lagoon.

6. **Yards.** The side yard shall be consistent with LAMC requirements but shall not be less than 3 feet 6 inches.

7. **Parking.** As shown in "Exhibit A" and as approved by the Department of Building and Safety, the project shall provide a total of eleven (11) vehicle parking spaces, where one parking space maybe substituted for four bicycle parking spaces. All vehicle access shall be from Hurricane Street.

   Signage for the surface parking lot shall be installed to clearly identify the public parking spaces and to inform the public of the hours of use from sunrise to sunset. The surface parking lot shall be locked from sunset to sunrise.

8. **Drainage.** The applicant shall submit drainage plans to the Department of Building and Safety for its approval. All drainage for new construction shall be directed away from the Ballona Lagoon.

9. **Grading.** The project includes necessary grading and excavation, comprised of 7,324 cubic yards of cut and 5,864 cubic yards of fill and the export of 1,460 cubic yards of soil, subject to review and final approval by the Department of Building and Safety. The project shall comply with the Conditions of Approval required in the Geology and Soils Report Approval Letter issued by the Department of Building and Safety, Grading Division, dated November 15, 20218 (Log No. 104503-01) and any subsequent amendment thereto. All Conditions of Approval shall be incorporated and printed on the plans submitted for plan check.

10. All landscaping shall be drought tolerant and native or non-invasive plan species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, or identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as "noxious weed" by the State of California or the U.S. Federal Government shall be utilized within the property.

11. Outdoor lighting shall be designed and installed with shielding so that light does not overflow into adjacent residential properties.

12. 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.

13. 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 Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.

14. Prior to the issuance of any permits, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the subject case file.

Environmental Conditions – Mitigation Measures

15. The project shall be in substantial conformance with the mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) in the subject case file. The implementing and enforcing agencies may determine substantial conformance with mitigation measures in the MMP. If substantial conformance results in effectively deleting or modifying the mitigation measure, the Director of Planning shall provide a written justification supported by substantial evidence as to why the mitigation measure, in whole or in part, is no longer needed and its effective deletion or modification will not result in a new significant impact or a more severe impact to a previously identified significant impact.

16. If the Project is not in substantial conformance to the adopted mitigation measures or MMP, a modification or deletion shall be treated as a new discretionary action under CEQA Guidelines, Section 15162(c) and will require preparation of an addendum or subsequent CEQA clearance. Under this process, the modification or deletion of a mitigation measure shall not require a Plan Approval filing unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or are non-environmental.

17. The project shall provide an informational webpage for the benefit of the neighbors and community members. The information webpage shall include, but not limited to, reporting on weekly methane levels, emergency response plan and street closures.

18. The applicant shall provide an emergency response plan and provide such plan to property owners and occupants within 100 feet of the subject site (excluding public rights-of-way).

19. The applicant shall provide an allowance for mitigation of inadvertent damage caused during construction.

Administrative Conditions

20. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and 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 and 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.

21. **Notations on Plans.** Plans submitted to the Department of Building and 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.

22. **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.

23. **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.

24. **Department of Building and 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 and 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 and 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.

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

26. **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

General Plan/Charter Findings

1. General Plan Land Use Designation

The subject site is located within the Venice Community Plan area, adopted by the City Council on September 29, 2000. The Community Plan designates the subject site as Medium Residential. The subject site is also located within an area covered by the Venice Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001. The Venice LUP supersedes the Venice Community Plan area for portions in the Coastal Zone. The Venice LUP designates the project site as Low Medium II Multiple Family Residential. The corresponding zone for Low Medium II Multiple Family Residential is RW2 zone in the Venice Community Plan.

The requested General Plan Amendment would change the Venice Coastal Zone LUP and Venice Community Plan to re-designate the subject site from Low Medium II Multiple Family Residential to Public Facility with a corresponding zone of Public Facility (PF). The corresponding zone for the Public Facility land use designation in the Venice Community Plan is the Public Facility (PF) zone.

As such, the recommended Zone Change to PF for the subject site would be consistent with the adoption of the recommended general plan amendment and would be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Venice Community Plan and the certified Venice Coastal Zone Land Use Plan.

2. General Plan Text

The General Plan serves as a blueprint for the future, prescribing goals, policies and objectives to shape and guide the physical development of the City. Further, the General Plan is a vision for how the City will evolve, reflecting the values and priorities of its communities. As such, the General Plan is intended to inform land use decisions. The General Plan consists of the Framework Element, the Land Use Element comprising 35 Community Plans and ten specific subject elements. The ten specific subject elements include: Housing, Safety, Health, Mobility, Conservation, Air Quality, Noise, Infrastructure Systems, Public Facilities & Services, and Open Space.

The subject site is located within the Venice Community Plan, adopted by the City Council on September 29, 2000. The subject site is also located within an area covered by the Venice Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001.

The requested General Plan Amendment text change would modify Policy I.D.1 (Canals and Ballona Lagoon Waterway) to list public facilities as an allowable land use adjacent to the Venice canals and the Ballona Lagoon.

Framework Element

The Framework Element of the General Plan was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element is the organizing Element of the General Plan. Its policies address and connect all the Elements of the General Plan. The Framework Element is the strategy for long-term growth that sets a

citywide context to guide amendments to the Community Plans, zoning ordinances, and other land use decisions. The Framework Element defines Citywide policies regarding seven topic areas including Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services.

The Framework Element includes the following goals, objectives and policies relevant to the subject site and the requested General Plan Amendment and Zone Change. Below is an analysis of the Project's consistency with the objectives and policies of the Framework Element as described below.

Land Use

The Land Use Chapter of the Framework Element identifies objectives and supporting policies relevant to the proposed project. Those objectives and policies seek, in part, to support transportation and utility infrastructure needed to support anticipated population and job growth. The legislative actions and the proposed project would support and be consistent with the General Plan Framework Land Use Chapter as it accommodates infrastructure improvements to accommodate existing population and planned growth.

To support population growth, the Framework Element acknowledges that Los Angeles needs a strong, expanding economy, healthy neighborhoods, and a tax base that can support the basic public services necessary to maintain and improve its quality of life. In order for the City to provide services that the public expects, the Framework Element embraces a vision of Los Angeles as a sustainable city: one which manages its infrastructure and public services in a manner that avoids depletion or permanent damage of its natural resources.

Specifically, the Project would be consistent with the following goals, objectives, and policies, as set forth in the General Plan Framework Land Use Chapter:

Goal 3A (Distribution of Land Uses): A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.

Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.

Policy 3.3.1: Accommodate projected population and employment growth in accordance with the Long-Range Land Use Diagram and forecasts in Table 2-2 (see Chapter 2: Growth and Capacity), using these in the formulation of the community plans and as the basis for the planning for and implementation of infrastructure improvements and public services.

Infrastructure and Public Services

The Infrastructure and Public Services Chapter of the Framework Element identifies objectives and supporting policies relevant to the Project Site. Those objectives and policies seek, in part, to support Infrastructure improvements that will be required to support the needs of the City's growth and, at the same time, to replace existing facilities that have deteriorated due to age or have become obsolete. The legislative actions and the proposed project would support and be consistent with the General Plan Framework Infrastructure and Public Services Chapter as it accommodates infrastructure improvements to accommodate existing population and planned growth.

The proposed project will comply with and supports the following goals, objectives, policies, implementation programs of the Infrastructure and Public Services Chapter.

Goal 9A (Wastewater): Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.2: Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.1: Collect and treat wastewater as required by law and Federal, State, and regional regulatory agencies.

Policy 9.2.2: Maintain wastewater treatment capacity commensurate with population and industrial needs.

Policy 9.2.3: Provide for additional wastewater treatment capacity in the Hyperion Service Area (HSA), as it becomes necessary.

Policy 9.2.4: Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

Policy 9.2.5: Review other means of expanding the wastewater system's capacity.

Objective 9.4: Ensure continued provision of wastewater collection and treatment after an earthquake or other emergency.

Goal 9B (Stormwater): A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.

Objective 9.5: Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.

Policy 9.5.1: Develop a stormwater management system that has adequate capacity to protect its citizens and property from flooding which results from a 10-year storm (or a 50-year storm in sump areas).

Policy 9.5.3: Implement programs to correct any existing deficiencies in the stormwater collection system.

Policy 9.5.4: Ensure that the City's drainage system is adequately maintained.

Implementation Program P7: Formulate/update a wastewater plan to provide sufficient capacity to correct existing deficiencies and meet the needs of future growth. Consider the following actions when developing/updating this Element:

a. Identify necessary additional wastewater treatment capacity, collection and conveyance facilities, including, but not limited to, a new wastewater treatment facility for the Hyperion Service Area, a replacement sewer for the North Outfall Sewer and the implementation of an ongoing program to identify and promptly rehabilitate and/or replace deteriorated sewers.

b. Use as the standard for facility planning the hydraulic relief for any part of the collection system that averages over 50 percent capacity and the level of wastewater treatment necessary for compliance with all applicable State and Federal water quality requirements.

The Framework Element acknowledges the strategic pressures and challenges in maintaining and upgrading the vast, complex and aging network of public facilities and infrastructure. Much of the city's infrastructure is between 20 and 100 years old and is increasingly at risk of failure. The city faces the constant need to implement preventative maintenance, replace worn-out equipment, and make timely repairs to keep its foundational systems functioning effectively. In addition, Los Angeles must make significant infrastructure improvements to comply with federal and state laws governing clean air, clean water, and solid waste diversion. These regulations establish a minimum quality of service that the city is legally required to provide its citizens.

As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination. As such, the legislative actions and the proposed project would support and be consistent with the General Plan Framework as it accommodates infrastructure improvements to accommodate existing population and planned growth.

Land Use Element

Venice Community Plan

The Venice Community Plan was adopted by the City Council on September 29, 2000. The Venice Community Plan Area contains approximately 2,061 acres, representing 0.7 percent of the land in the City of Los Angeles. The Community Plan's purpose is to promote an arrangement of land use, circulation, and services, which all encourage and contribute to

the economic, social, health, and welfare of the Community. In that regard, the Venice Community Plan establishes land use designations and corresponding zones that can be applied to properties. The Project site is located within the Venice Community Plan, which designates the site for Medium Residential land uses. The Venice Community Plan sets forth goals, objectives, policies, and programs that can assist decision makers to review new development proposals or to consider a proposed ordinance or policy.

The proposed project will comply with and supports the following goals, objectives and policy of the Venice Community Plan:

Goal 18: Preservation of the scenic and visual qualities of coastal areas.

Objective 18-1 To govern the manner in which the City of Los Angeles implements the California Coastal Act of 1976, as well as the establishment of land uses and their subsequent development.

Policy 18-1.1 The location and amount of new development should maintain and enhance public access to the coast.

Policy 18-1.2 The protection of estuaries and wetlands and the restoration and protection of the Venice Canals.

The project proposes the construction of a new two-story, 2,283 square foot wastewater pumping plant to provide critical backup capacity to the existing Venice Pumping Plant. The project also includes a number of co-benefits a new public parking lot and habitat restoration to enhance coastal access and coastal resources.

Venice Coastal Zone Land Use Plan

The Venice Coastal Zone Land Use Plan (LUP) was adopted by the City Council on October 29, 1999 and certified by the California Coastal Commission on June 14, 2001. The LUP is part of the Local Coastal Program intended for the Venice Coastal Zone. However, the necessary Implementation Plan was not adopted. The LUP was adopted by means of a plan amendment to the Community Plan and provides policies applicable to development in the Venice Coastal Zone. The Venice Coastal Zone Land Use Plan is an amendment to the Venice Community Plan and supersedes the Venice Community Plan for areas within the Coastal Zone. The subject site is located within the Ballona Lagoon West Subarea with a land use designation Low Medium II Residential.

The unique geography of the Venice Coastal Zone, characterized by its canals, lagoon, and extensive beachfront, combined with intense visitor traffic, places significant demands on its public infrastructure. To manage the pressures of development while protecting sensitive coastal resources, the Venice Coastal Zone Land Use Plan establishes a comprehensive set of policies for public works. Chapter II of the LUP outlines the land use policies for new development in the Venice Coastal Zone.

The proposed project will comply with and supports the following goals, objectives, and policy of the certified Venice Coastal Zone Land Use Plan:

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.

A network of pedestrian and bicycle routes shall be developed, enhanced and maintained to provide linkages within residential neighborhoods and between visitor-serving commercial areas and coastal recreational access points, transit routes, existing and projected parking facilities, and areas of historical significance to facilitate circulation of visitors within the heavily congested areas in Venice.

Policy IV.B.3. Ballona Lagoon Development Standards. The setbacks and height of buildings adjacent to the lagoon shall continue to be limited as provided in Policies I.A.4b, I.A.4c, and I.A.4d so that development is compatible with the continuance of the environmentally sensitive habitat area and avoids adverse impacts on avian flight patterns.
Policy V.A.1. General. Public services shall consider the competing needs of residents and visitors for use of roadways, existing parking, service systems, domestic water, public restrooms, etc., and shall allocate resources to expand the use of these existing facilities and create new facilities where necessary in a manner that they do not adversely affect residents. Public works projects shall be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the coastal development permit process as required by the Coastal Act.

Policy V.A.3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible. The City of Los Angeles Department of Public Works shall develop a comprehensive citywide Storm Water Management Program, as discussed further in Implementation Strategy of Policy IV.C.1 of this LUP, to control stormwater run-off from new public and private developments and, where feasible, to remove pollutants from that run-off. Development of infrastructure shall precede or be constructed concurrently with the construction of developments or in lieu-fee should be paid.

Historically, the Venice Coastal Zone has faced significant challenges related to sewer capacity and accidental raw sewage discharges from the Venice Pumping Plant. As noted in the LUP's summary of historical issues, these points of failure created the policy imperative for a robust, modern, and well-maintained wastewater system capable of protecting public health and sensitive marine environments like the Venice Canals and Ballona Lagoon. As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes the VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination.

The proposed General Plan Amendment will amend the following policies to facilitate the proposed project:

Policy I.A.7. Multi-family Residential-Low Medium II Density: Accommodate the development of multi-family dwelling units in the areas designated as “Multiple Family Residential” and “Low Medium II Density” on the Venice Coastal Land Use Plan.

Policy I.D.1. Canals and Ballona Lagoon Waterways. The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of

Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the "Open Space" designation.

Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

The proposed amendment will change the land use designation from Low Medium II Residential to Public Facility and add public facilities as an allowable use adjacent to the Grand Canal and the Ballona Lagoon. As such, the legislative actions and the proposed project would support and be consistent with the Venice Community Plan and Venice Coastal Zone Land Use Plan as it enhances environmental protection and Coastal access.

Public Facilities & Services Element

This Element provides a strategic framework for maintaining the City's vast and complex network of public services. This Element identifies a number of challenges including maintaining and upgrading vast, aging systems, accurately identifying and planning for future improvements and meeting federally and state-mandated service levels and environmental laws. The plan for sewerage provides the following objectives:

To provide a basis for the development of a safe, efficient and economical sewerage system for the City of Los Angeles.

To establish criteria for the location, design and installation of sewerage facilities which will minimize odor and unsightliness.

To provide a basis for the improvement of existing sewerage facilities, the development of proposed facilities, and the accommodation of future technical improvements and alternative concepts of City development.

To recognize that the system should not be limited by political boundaries.

The central challenge addressed by the city's policies is balancing the need for capacity expansion to support growth with the imperative of sustainable resource management. This involves not only upgrading and maintaining physical systems but also implementing demand-side management, conservation, and resource reclamation strategies.

As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes the VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of

environmental contamination. As such, the legislative actions and the proposed project would support and be consistent with the Public Facilities & Services Element as it provides a crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination of the City's wastewater system.

No Net Loss of Housing Element Sites – Compliance Findings

California Government Code Section (GCS) 65863 generally prohibits local jurisdictions from approving development projects that result in fewer units by income category than were projected for any parcel(s) identified in the 2021-2029 Housing Element, unless a finding can be made that the Housing Element's remaining sites have sufficient capacity to meet the jurisdiction's unmet Regional Housing Need Allocation (RHNA) for each income category.

The project site is located on parcel(s) identified to accommodate 0.107 Lower Income units in the City's 2021-2029 Housing Element. The proposed development includes a total of zero dwelling units. Consequently, the City must make the following written finding, supported by substantial evidence, to approve the development project:

The remaining sites identified in the housing element are adequate to meet the requirements of Government Code Section (GCS) 65583.2 and to accommodate the jurisdiction's share of the regional housing need pursuant to GCS 65584. The finding shall include a quantification of the remaining unmet need for the jurisdiction's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.

Pursuant to GCS 65863(b)(2), the City finds that while the proposed project would result in fewer units by income category than anticipated for that site in the 2021-2029 Housing Element, the remaining sites identified in the Housing Element of the General Plan are adequate to meet the requirements of GCS 65583.2 and accommodate the jurisdiction's share of the regional housing need pursuant to GCS 65584. As noted in Chapter 4 of the 2021-2029 Housing Element, the City assumed the identified Housing Element Sites would individually have a very low likelihood of redevelopment into housing. Therefore, the Housing Element assigned very low projected density/capacity figures that are well below the maximum zoned capacity of each individual Housing Element Site. Chapter 4 of the 2021-2029 Housing Element also notes that the City followed guidance from the California Department of Housing and Community Development (HCD) by setting a target capacity that is 10% higher than the RHNA for lower-income units, and 15% higher than the RHNA for moderate-income units.

Based on the sites inventory and inventory of candidate sites included in the 2021-2029 Housing Element, as well as the most recent Annual Progress Report on the Housing Element submitted to HCD, the City has an unmet need of 110,694 Very Low Income Units, 62,625 Low Income Units, 74,249 Moderate Income Units, and 139,842 Above-Moderate Income Units. In addition, as of April 1, 2025, the City has a remaining capacity of 306,137 Very Low Income Units, 306,137 Low Income Units, 53,188 Moderate Income Units, and 885,801 Above-Moderate Income Units. The excess Above-Moderate Income Unit capacity may accommodate both Moderate and Above-Moderate Unit RHNA Allocations. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the planning period, and in compliance with the requirements of GCS 65583.2.

Remaining General Plan Elements

The Housing Element, Mobility Element, Health and Wellness Element, Safety Element, Conservation Element, Air Quality Element and Noise Element do not provide subject site or wastewater objectives or policies. However, all of these elements to varying degrees emphasize the operational integrity of the city's economy and the health of its population depends directly on the capacity and resilience of its core infrastructure.

3. **Charter Finding 555.** The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity.

   The General Plan Amendment is to facilitate the development of the Venice Auxiliary Pumping Plant by re-designating the land use designation from Low Medium II residential to Public Facility for the project site within the Venice Community Plan and Venice Coastal Zone Land Use Plan maps. The General Plan Amendment also includes a text change to allow public facilities to be located adjacent to the Grand Canal and the Ballona Lagoon.

   The General Plan amendment is for an area with a significant economic and physical identity. The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within a Public Facility Land Use Designation in the Venice Community Plan area. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of Los Angeles International Airport. The facility was designed and built in 1957. Five pumps currently serve the 68 year old facility. The VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. However, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps on three adjacent city-owned vacant lots at 3813 and 3817 Esplanade and 128 Hurricane for a surface parking lot.

   The General Plan Amendment is to facilitate the expansion of an existing facility with strong economic and physical identity at this location with an auxiliary facility to support the primary function of the VPP. The VPP and VAPP will be located on adjacent lots separated by Hurricane Street and Canal Court creating a unified project site providing the same function. Therefore, the General Plan amendment and the proposed project would contribute to and strengthen an area which has significant social, economic or physical identity.

4. **Charter Finding 556.** When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

   The subject site is located within the Venice Community Plan area, adopted by the City Council on September 29, 2000. The Community Plan designates the subject site as Medium Residential. The subject site is also located within an area covered by the Venice Local Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001. The Venice Coastal Zone LUP designates the project site as Low Medium II Multiple Family Residential. The

corresponding zone for Low Medium II Multiple Family Residential is RW2 in the Venice Community Plan.

The requested General Plan Amendment would re-designate the subject site from Low Medium II Multiple Family Residential to Public Facility with a corresponding zone of Public Facility (PF). The corresponding zone for the Public Facility land use designation in the Venice Community Plan is Public Facility (PF).

As discussed in Finding No. 2, the General Plan Amendment is consistent with and is in substantial conformance with the purposes, intent and provisions of the General Plan.

5. **Charter Finding 558**.

The proposed Amendment to the Venice Community Plan and certified Venice Coastal Zone Land Use Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.

The subject site is located within the Venice Community Plan area, adopted by the City Council on September 29, 2000. The Community Plan designates the subject site as Medium Residential. The subject site is also located within an area covered by the Venice Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001. The Venice LUP designates the project site as Low Medium II Multiple Family Residential. The corresponding zone for Low Medium II Multiple Family Residential is RW2 in the Venice Community Plan.

The requested General Plan Amendment would re-designate the subject site from Low Medium II Multiple Family Residential to Public Facility with a corresponding zone of Public Facility (PF). The corresponding zone for the Public Facility land use designation in the Venice Community Plan is Public Facility (PF).

Public Necessity, Convenience and General Welfare.

The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within the Venice Community Plan area, adjacent to the Ballona Lagoon and the Grand Canal. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of Los Angeles International Airport. The facility was designed and built in 1957. Five pumps currently serve the facility. The VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. Transporting wastewater over such long distances, and often uphill, requires considerable energy to overcome gravity. To address this obstacle, the Coastal Sewer relies on a system of force mains (pressurized pipes) and pumping plants (mechanical systems that generate hydraulic pressure). Together these components generate the necessary transport power needed to move wastewater through the system and deliver it to its ultimate destination: the Hyperion Treatment Plant.

Unlike other portions of the City's sewage collection and conveyance system, there are no diversions for bypassing the VPP for required maintenance or in the event of an emergency. Pumping such a large volume of wastewater requires significant pressure, particularly because the Hyperion Treatment Plant sits approximately 60 feet higher in elevation than the Venice Pumping Plant. The failure of a single pump during high-flow periods could result in sewage backups. In the past, the City has rented portable pumps when one or more of

the pumps were offline for repairs. However, portable pumps must operate above ground, which introduces additional impacts such as noise and odor that are otherwise avoided with permanent, below-grade pumps. In addition, the sourcing temporary solid-waste pumps of the correct capacity can also be challenging, particularly in an emergency, when time is critical.

During dry-weather flows (no rain), two pumps generally pump an average of 20 million gallons per day (mgd) of sewage. However, all five pumps have been used simultaneously to convey sewage influent from the collection area to the Hyperion Treatment Plant during wet-weather flows (rain), depending on conditions. During certain years, flows during wet-weather conditions have reached 50 mgd and on several occasions, during extreme weather events (e.g., El Niño in 1997), the flows exceeded the combined and simultaneous pumping capacity of the facility, resulting in near miss events, which would have required emergency discharges directly into the Grand Canal and Ballona Lagoon or overflows into the surrounding street network.

Therefore, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination. As such, the VAPP is a public necessity contributing to the general welfare.

Good Zoning Practice

Los Angeles is guided by a comprehensive policy framework, articulated in the General Plan, that governs critical infrastructure systems, making a deliberate shift from responding to hazards to proactively enlisting planners and engineers to engage in pre-disaster planning and risk reduction for essential systems. The VAPP is part of a strategic roadmap to modernize the City's foundational systems, correct existing service deficiencies and accommodate future growth. Specifically, the VAPP is the continuation of the City's investment in upgrading the wastewater system that started with the Venice Dual Force Main project in 2015.

As such, the requested General Plan Amendment from Low Medium II Residential to Public Facility for the subject site to allow the development of the Venice Auxiliary Pumping Plant supports the long term capital investment plan (CIP) by the Department of Public Works representing good planning practice.

Entitlement Findings

6. Zone Change Findings.

   a. **The action substantially conforms to the purposes, intent and provisions of the General Plan.**

      The General Plan is the City's roadmap for future growth and development. The General Plan elements establish goals, policies, purposes, and programs that provide for the regulatory environment in managing the City, and for addressing environmental concerns and problems. The majority of the policies derived from these elements are in the form of LAMC requirements. Except for the entitlements described herein, the project does not propose to deviate from any other LAMC requirements. The General Plan is comprised of the Framework Element, seven state-mandated elements, and four

additional elements adopted by the City Council. The Framework Element establishes the broad overall policy and direction for the General Plan. The request is consistent with the following Framework objectives and policies for the City's Infrastructure and Public Services:

Goal 9A Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.2 Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.4 Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

The proposed VAPP is a City infrastructure improvement project that will supplement the operation of the existing VPP. It is a necessary public infrastructure project that will provide safety and protect human life from a potential release of sewage into the Venice Grand Canal. The applicant is requesting a Conditional Use to allow the construction, use, and maintenance of new auxiliary pumping plant and a new surface parking lot in the proposed Public Facility – PF zone. As discussed in Finding No. 10, and further conditioned, the proposed height, setbacks, permeable yards, and parking conform with the policies and requirements of the certified LUP, Specific Plan, and LAMC. The proposed VAPP and new parking lot would upgrade and enhance an existing system, consistent with the goals and objective of the Framework Element and LUP of the General Plan. As such and as discussed in further detail in Finding No. 2, the Project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and applicable specific plan.

b. **The proposed ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.**

Public Necessity, Convenience and General Welfare

The existing Venice Pumping Plant is the City's largest wastewater pumping facility and serves as critical infrastructure for conveying sewage from the surrounding Venice area, as well as portions of the City of Los Angeles, the City of Santa Monica, and Los Angeles County. The facility currently lacks capacity for additional pumps to ensure system reliability during wet weather conditions. The proposed VAPP is intended to provide needed redundancy to prevent system failure during such events. By supplementing the existing pumping capacity, the VAPP is engineered to ensure system reliability, protect public health, and prevent catastrophic environmental damage to sensitive coastal waters.

The proposed project includes many features that support convenience and public welfare including:

1. A new surface parking lot will provide seven parking spaces, including one ADA-compliant parking space, and four bicycle parking spaces.

2. The re-abandonment of an inactive oil well, originally abandoned in 1932, to meet modern safety standards. The contaminated soil on the site will be excavated and safely removed.

3. A landscaped bioswale will be installed to naturally capture and filter stormwater runoff from the parking lot, protecting the water quality of the adjacent and ecologically sensitive Ballona Lagoon.

4. The new lot will feature landscaping with drought-tolerant plants and a public art installation, enhancing the site's aesthetic and function.

In short, the granting of the requested legislative action is a public necessity and is beneficial to the general welfare by providing an essential public service within the Venice Community Plan area. The Venice Auxiliary Pumping Plant is a critical infrastructure project designed to protect public health and the local environment by preventing sewage overflows into the Grand Canal and surrounding streets. It addresses a pressing need for system redundancy and resilience, particularly during heavy storms. In addition to its primary mission, the project will deliver lasting community benefits, including an environmentally cleaned-up site, new public parking, improved stormwater management, and public amenities that will enhance the Venice community. Therefore, the Project would be consistent with the public necessity, convenience, and general welfare of the surrounding area.

Good Zoning Practice

Los Angeles is guided by a comprehensive policy framework, articulated in the General Plan, that governs critical infrastructure systems, making a deliberate shift from responding to hazards to proactively enlisting planners and engineers to engage in pre-disaster planning and risk reduction for essential systems. The VAPP is part of a strategic roadmap to modernize the City's foundational systems, correct existing service deficiencies and accommodate future growth. Specifically, the VAPP is the continuation of the City's investment in upgrading the wastewater system that started with the Venice Dual Force Main project in 2015.

As such, the requested General Plan Amendment from Low Medium II Residential to Public Facility for the subject site to allow the development of the Venice Auxiliary Pumping Plant supports the long term capital investment plan (CIP) by the Department of Public Works representing good planning practice.

Conditional Use Findings
Pursuant to the LAMC Section 12.24 U.21, the applicant requests a Class 3 Conditional Use Permit to allow a pumping plant and a surface parking lot within the Public Facility Zone "PF".

7. **The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region**.

The proposed project consists of the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map to redesignate the subject site from Low Medium II Residential to Public Facility, and a Zone

Change from Residential Waterways Zone "RW2" to Public Facilities Zone "PF". The Applicant requests a Class 3 Conditional Use Permit pursuant to LAMC Section 12.24 U.21, to allow a pumping plant and a surface parking lot within the Public Facilities Zone "PF".

The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within the Venice Community Plan area, adjacent to the Ballona Lagoon and the Grand Canal. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of Los Angeles International Airport. The facility was designed and built in 1957. Five pumps currently serve the facility. The 68 year old VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. Transporting wastewater over such long distances, and often uphill, requires considerable energy to overcome gravity. To address this obstacle, the Coastal Interceptor Sewer relies on a system of force mains (pressurized pipes) and pumping plants (mechanical systems that generate hydraulic pressure). Together these components generate the necessary transport power needed to move wastewater through the system and deliver it to its ultimate destination: the Hyperion Treatment Plant.

Unlike other portions of the City's sewage collection and conveyance system, there are no diversions for bypassing the VPP for required maintenance or in the event of an emergency. Pumping such a large volume of wastewater requires significant pressure, particularly because the Hyperion Treatment Plant sits approximately 60 feet higher in elevation than the Venice Pumping Plant. The failure of a single pump during high-flow periods could result in sewage backups. In the past, the City has rented portable pumps when one or more of the pumps were offline for repairs. However, portable pumps must operate above ground, which introduces additional impacts such as noise and odor that are otherwise avoided with permanent, below-grade pumps. Additionally, the sourcing temporary solid-waste pumps of the correct capacity can also be challenging, particularly in an emergency, when time is critical.

Therefore, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination. As such, the project provides a service that is essential and beneficial to the community, city, and region.

8. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety**.

The Project is located in an urbanized area developed with residential uses and a pumping plant, adjacent to the Grand Canal and Ballona Lagoon. As discussed in Finding No. 10.A.5, the development of the VAPP and surface parking lot will be compatible with the character of the surrounding neighborhood and will supplement the operation of the VPP. In terms of the mass and scale, the proposed VAPP building conforms with all applicable development standards in the Venice LUP and is similar in height and design to the residential structures located within this neighborhood.

The new parking lot will provide seven required parking spaces including one ADA-compliant space and four bicycle parking spaces. The public parking spaces are public amenity for the neighborhood area adjacent to the Grand Canal, Ballona Lagoon, Esplanade trails and Venice Beach. The provision of adequate onsite parking with new development is one means by

which to protect public access because sufficient on-site parking can help minimize access conflicts between residents, workers, and visitors to the area who compete for public street parking in popular coastal areas, such as Venice. Furthermore, the project will improve the site and water quality by providing new landscaping, a bioswale and public art.

The VAPP EIR and Addendums provide a full discussion of the environmental impacts and further identified mitigation measures (MMRP) to ensure any potential impacts are reduced to a less than significant level. For example, the project includes the re-abandonment of an inactive oil well, originally abandoned in 1932, to meet modern safety standards. The California Coastal Commission issued Coastal Development Permit places additional conditions of approval that further reduces environmental impacts from the project. For example, the project provides a landscaped bioswale to naturally capture and filter stormwater runoff from the parking lot, protecting the water quality of the adjacent and ecologically sensitive Ballona Lagoon. As conditioned, the VAPP conforms with the policies and requirements of the certified Venice LUP, Venice Coastal Zone Specific Plan, and LAMC. As such, the Project will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

9. **The project substantially conforms to the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan**.

The General Plan is the City's roadmap for future growth and development. The General Plan elements establish goals, policies, purposes, and programs that provide for the regulatory environment in managing the City, and for addressing environmental concerns and problems. The majority of the policies derived from these elements are in the form of LAMC requirements. Except for the entitlements described herein, the project does not propose to deviate from any other LAMC requirements. The General Plan is comprised of the Framework Element, seven state-mandated elements, and four additional elements adopted by the City Council. The Framework Element establishes the broad overall policy and direction for the General Plan. The request is consistent with the following Framework objectives and policies for the City's Infrastructure and Public Services:

Goal 9A Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.2 Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.4 Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

The proposed VAPP is a City infrastructure improvement project that will supplement the operation of the existing VPP. It is a necessary public infrastructure project that will provide safety and protect human life from a potential release of sewage into the Venice Grand Canal. The applicant is requesting a Conditional Use to allow the construction, use, and maintenance of new auxiliary pumping plant and a new surface parking lot in the proposed Public Facility – PF zone. As discussed in Finding No. 10, and further conditioned, the proposed height, setbacks, permeable yards, and parking conform with the policies and requirements of the certified LUP, Specific Plan, and LAMC. The proposed VAPP and new parking lot would upgrade and enhance an existing system, consistent with the goals and objective of the Framework Element and LUP of the General Plan. As such and as discussed in further detail

in Finding No. 2, the Project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and applicable specific plan.

Project Compliance Findings

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

The project proposes the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map, to re-designate the subject site from Low Medium II Residential to Public Facility and a related text change.

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 Ballona Lagoon West Bank Subarea set forth in Section 10.A, 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. **That 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 project proposes the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map, to re-designate the subject site from Low Medium II Residential to Public Facility, and a related text change.

The VAPP site is comprised of two vacant lots fronting the Grand Canal and the VAPP parking lot is comprised of a vacant lot fronting the Ballona Lagoon. Both parcels are zoned RW2-1 and designated as Low Medium II Residential land use. The Project Site is a highly urbanized area within the Ballona Lagoon West subarea of the Venice Coastal Zone Specific Plan. This area contains a mix of residential, open space, and public facility uses. North and west of 3813 and 3817 South Esplanade are single and multi-family residential uses in the RW2-1 and R3-1 zone. To the east is the Venice Canal System, which is designated as open space. To the south is the existing VPP in the RW1-1 zone with a public facilities land use designation. The VAPP site fronts South Esplanade (Grand Canal) and abuts Canal Court and Hurricane Street, the VAPP parking lot fronts the Ballona Lagoon) and abuts Canal Court and Hurricane Street.

The existing VPP, proposed VAPP, and parking lot are located within a residential neighborhood, developed with single and multi-family residential structures that

are two and three stories in height. There are three two-story, multi-family residential structures on the block of South Esplanade bounded by Hurricane Street, Galleon Street, and Canal Court. Directly across Canal Court from the project is a three-story multi-family structure. Across South Esplanade and the canal are single-family residential structures ranging from two to three stories in height. The proposed two-story structure is designed with a flat roofline and a raised parapet to screen rooftop equipment; the building height varies from 30 to 32 feet. The proposed height and massing are consistent with the existing two and three-story structures adjacent to the Grand Canal. The proposed structure provides an average setback of 15 feet from the Esplanade. A six-foot tall decorative fence encloses the subject site. However, the project provides a 10-foot wide open space area for public use, immediately adjacent to the Esplanade walkway. The proposed surface parking lot is fully landscaped including a new bioswale.

In short, the proposed VAPP building conforms with all applicable development standards in the Venice Coastal Zone LUP and is similar in height and design to the residential structures located within this neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood and will not be detrimental to the adjoining properties or the immediate area.

2. **That 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. As such, the Venice Community Plan area does not have a certified Venice Local Coastal Program. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map, to redesignate the subject site from Low Medium II Residential to Public Facility, and related text changes.

The proposed project will comply with and supports the following goals, objectives, and policy of the certified Venice Coastal Zone Land Use Plan:

> **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.
>
> A network of pedestrian and bicycle routes shall be developed, enhanced and maintained to provide linkages within residential neighborhoods and between visitor-serving commercial areas and coastal recreational access points, transit routes, existing and projected parking facilities, and areas of historical significance to facilitate circulation of visitors within the heavily congested areas in Venice.
>
> **Policy IV.B.3.** Ballona Lagoon Development Standards. The setbacks and height of buildings adjacent to the lagoon shall continue to be limited as provided in Policies I.A.4b, I.A.4c, and I.A.4d so that development is

compatible with the continuance of the environmentally sensitive habitat area and avoids adverse impacts on avian flight patterns.

Policy V.A.1. General. Public services shall consider the competing needs of residents and visitors for use of roadways, existing parking, service systems, domestic water, public restrooms, etc., and shall allocate resources to expand the use of these existing facilities and create new facilities where necessary in a manner that they do not adversely affect residents. Public works projects shall be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the coastal development permit process as required by the Coastal Act.

Policy V.A.3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible. The City of Los Angeles Department of Public Works shall develop a comprehensive citywide Storm Water Management Program, as discussed further in Implementation Strategy of Policy IV.C.1 of this LUP, to control stormwater run-off from new public and private developments and, where feasible, to remove pollutants from that run-off. Development of infrastructure shall precede or be constructed concurrently with the construction of developments or in lieu-fee should be paid.

Historically, the Venice Coastal Zone has faced significant challenges related to sewer capacity and accidental raw sewage discharges from the Venice Pumping Plant. As noted in the LUP's summary of historical issues, these points of failure created the policy imperative for a robust, modern, and well-maintained wastewater system capable of protecting public health and sensitive marine environments like the Venice Canals and Ballona Lagoon. As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes the VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination.

The proposed General Plan Amendment will amend the following policies to facilitate the proposed project:

Policy I.A.7. Multi-family Residential-Low Medium II Density: Accommodate the development of multi-family dwelling units in the areas designated as “Multiple Family Residential” and “Low Medium II Density” on the Venice Coastal Land Use Plan.

Policy I.D.1. Canals and Ballona Lagoon Waterways. The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources and are rezoned to the “Open Space” designation.

Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface

public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

The proposed amendment will change the land use designation from Low Medium II Residential to Public Facility and add public facilities as an allowable use adjacent to the Grand Canal and the Ballona Lagoon. As such, the proposed development is consistent with the policies of the Land Use Plan and the standards of the Specific Plan and 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.

4. **That the applicant has guaranteed to keep the rent levels of any Replacement Affordable Unit at an affordable level for the life of the proposed Venice Coastal Development Project and to register the Replacement Affordable Units with the Los Angeles Department of Housing**.

   The project proposes the construction of a pumping plant and surface parking lot on vacant lots. Therefore, Replacement Affordable Units are not proposed or required for this project.

5. That 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).

   The project proposes the construction of a pumping plant and surface parking lot on vacant lots. No affordable units are proposed or required for this project.

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*. The project includes a Zone Change from Residential Waterways Zone "RW2" to Public Facility Zone "PF." There are no limitations to the number of Public Facility-zoned lots that maybe consolidated. As such, the proposed project is in conformance with Section 9.A of the Venice Coastal Specific Plan.

2. *Height*. As shown in "Exhibit A", the height of the structure is measured from the average existing natural grade and conforms to the standards of measurement as outlined in Section 9.B of the Venice Coastal Specific Plan.

3. *Roof Structures*. The proposed project does not include a Roof Access Structure.

C. Sections 10.A Land Use and Development Regulations for Ballona Lagoon West Subarea

1. ***Height.*** *Within 60 feet of the mean high tide of the Ballona Lagoon or inland side of the Esplanade (City right-of-way), whichever is furthest from the water as determined by a licensed surveyor, Venice Coastal Development Prcjects shall not exceed a maximum height of 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet.*

   As shown in "Exhibit A", the proposed project maintains the ascending height limit respective to the horizontal depth. Within 60 feet of the Esplanade, the proposed project maintains a maximum height of 29 feet 6 inches with an increasing height to a maximum of 32 feet 6 inches. No buildings are proposed for the new surface parking lot. As such, the project complies with Section 10.A.1 of the Specific Plan.

2. ***Setbacks and Yards.*** *An average setback of 15 feet, but not less than ten feet shall be maintained from the lot line nearest to the water. An open, permeable yard with an area of at least 15 times the lot width and a minimum area of 450 square feet shall be maintained between the property line that faces the water and the front of any structure. No building extensions, including stairs and balconies, shall be allowed in the required Permeable yard area, except for ground level Permeable decks that do not exceed 18 inches in height. The combined height of any decks, railings, garden walls, and fences situated within the required Permeable yard shall not exceed six feet above the elevation of the acjacent public walkway. The side yard shall be consistent with LAMC requirements but shall not be less than 3 feet 6 inches.*

   As shown in "Exhibit A", the project site for the VAPP has a lot width of 78 feet 5 inches, which requires approximately 1,176 square feet of Permeable Yard area. The project provides a 10-foot 2-inch landscaped front yard setback along the Grand Canal property line for 2,932 square feet of Permeable Yard. The project site for the surface parking lot has a lot width of 35 feet, which would require 525 square feet of Permeable Yard area, a total of 1,074 square foot permeable yard area is proposed. In addition, as shown in "Exhibit A, the new fence and public art installation are less than six feet in height.

   Lastly, as conditioned, the side yard setbacks shall be consistent with LAMC requirements but not less than 3 feet 6 inches in width. As such, the project complies with Section 10.A.2 of the Specific Plan.

3. ***Fill.*** *No fill shall be permitted in the lagoon and buffer area, except for the minimum amount necessary for habitat restoration and public access.*

   The only fill proposed for the lagoon is backfill for habitat restoration and will comply with the mitigation measures outlined in the EIR and MMRP.

4. ***Drainage****. Prior to issuance of a building permit for a new Venice Coastal Development Prcject or an expansion of the existing building footprint by more than ten percent, the applicant shall submit drainage plans to the Department of Building and Safety for its approval. All drainage for new construction shall be directed away from Ballona Lagoon. The applicant and all successors in interest*

shall maintain the approved Venice Coastal Development Prcject consistent with the drainage plans approved by the Department of Building and Safety.

As conditioned, the applicant shall submit drainage plans to the Department of Building and Safety for its approval and all drainage shall be directed away from the Ballona Lagoon.

D. Section 13: Parking

1. Parking Requirement and Beach Impact Zone Parking Requirement.

As shown in "Exhibit A", and consistent with the Parking Requirement Table, the Beach Impact Zone Parking Requirements and the California Coastal Commission issued Coastal Development Permit, the project provides a total of 10 parking spaces – three (3) parking spaces on-site and seven (7) parking spaces within the surface parking lot.

11. **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.**

The City of Los Angeles found, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the Venice Auxiliary Pumping Plant Environmental Impact Report SCH No. 2015111038 certified on August 8, 2017; and pursuant to CEQA Guidelines 15162 and 15164, and the Addendums dated October 29, 2021 and June 2024, no major revisions are required to the EIR and no subsequent EIR or negative declaration is required for approval of the project.

ADDITIONAL MANDATORY FINDING

12. 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, base flood elevations determined.

RESOLUTION

WHEREAS, the California Coastal Act of 1976 has declared that the California Coastal Zone is a distinct and valuable resource of vital and enduring interest to all the people and exists as a delicately balanced ecosystem; and

WHEREAS, one of the basic goals of the State is to protect; maintain, and where feasible, enhance and restore the overall quality of the Coastal Zone environment and its natural and manmade resources; and

WHEREAS, the California Coastal Act of 1976 requires each local government lying, in· whole or in part, within the Coastal Zone to prepare a Local Coastal Program for that portion of the Coastal Zone within its jurisdiction to assure that maximum public access to the coast and public recreation areas is provided, consistent with Chapter 3 of the Act; and

WHEREAS, portions of the Venice Community Plan lie within the Coastal Zone, as designated by the State Legislature; and

WHEREAS, the portion of Venice west of Lincoln Boulevard lies within the Coastal Zone; and

WHEREAS, Venice is identified as an area of special significance which required zoning regulations beyond that the traditional zoning code as determined after conducting several public meetings in coastal communities to identify coastal issues of major concern and after conducting several public workshops in coastal communities to develop a Specific Plan to address major issues; and

WHEREAS, on October 29, 1999, and pursuant to California Public Resources Code Section 30510(a), the City Council of the City of Los Angeles adopted the Land Use Plan of the Venice Local Coastal Program; and

WHEREAS, on November 29, 1999, the adopted Land Use Plan of the Venice Local Coastal Program was transmitted to the California Coastal Commission for consideration and certification, consistent with Section 30511(b) of the Coastal Act; and

WHEREAS, on November 14, 2000, the California Coastal Commission approved the Land Use Plan of the Venice Local Coastal Program with suggested modifications; and

WHEREAS, on March 28, 2001, the City Council of the City of Los Angeles adopted the suggested modifications to the Land Use Plan of the Venice Local Coastal Program; and

WHEREAS, on June 14, 2001 the California Coastal Commission certified the Land Use Plan of the Venice Local Coastal Program; and

WHEREAS, the subject project is located within the Venice Coastal Zone in the area covered by the Venice Community Plan; and

WHEREAS, the City Planning Commission recommended approval of a General Plan Amendment from Low Medium II Residential to Public Facility for the subject property and recommended approval of a Zone Change from RW2-1 to PF; and

WHEREAS, the City Planning Commission approved a project for the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces; and

WHEREAS, the City Planning Commission at its meeting on January 22, 2026 approved the General Plan Amendment and recommended approval by the City Council of a General Plan Amendment for the subject property; and

WHEREAS, pursuant to the provisions of the Los Angeles City Charter, the Mayor and City Planning Commission have transmitted their recommendations; and

WHEREAS, the requested General Plan Amendment is consistent with the intent and purpose of the adopted Venice Community Plan to designate land use in an orderly and unified manner; and

WHEREAS, the requested General Plan Amendment is consistent with the intent and purpose of the California Coastal Act and is intended to be carried out in a manner fully in conformity with the policies and requirements of the California Coastal Act; and

WHEREAS, the Zoning Change from RW2-1 to PF will provide consistency between the General Plan Land Use Designation and the Zoning; and

WHEREAS, the project was assessed in the certified Environmental Impact Report for the Venice Auxiliary Pumping Plant Project SCH 2015111038; and pursuant to CEQA Guidelines 15162 and 15164, and as supported by the Addendums dated October 29, 2021 and June 2024.

NOW, THEREFORE, BE IT RESOLVED that the Venice Community Plan be amended as shown on the attached General Plan Amendment map and certified Venice Land Use Plan map and text amendment.

NOW, THEREFORE, BE IT RESOLVED that the Venice Land Use Plan Amendment approved in this resolution shall become effective only after review and approval by the California Coastal Commission but shall become effective immediately after such approval by the Coastal Commission, without further review or approval required by the City Council.

NOW, THEREFORE, BE IT RESOLVED, that pursuant to California Public Resources Code Section 30510(b) and to Section 00071 of the Local Coastal Program Regulations of the California Coastal Commission, the City Council hereby directs the Director of City Planning to submit to the California Coastal Commission for its consideration and certification an amendment to the certified Land Use Plan of the Venice Local Coastal Program.



0 50 100

Feet

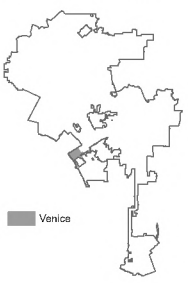
CPC-2024-2010-GPA-ZC-CU3-SPPC

AA/Cf

013125

VENICE

City of Los Angeles



Data Sources: Department of City Planning & Bureau of Engineering

EXHIBIT A:
Venice Land Use Plan Text Amendments

The City Council adopts the following amendments to the Venice Coastal Zone Land Use Plan. Additions shown in **bold underline** and deletions shown in ~~strikeout~~.

Modify Policy I. D. 1 on pages II-25 and II-26 of the LUP as follows:

> **Policy I. D. 1.** Canals and Ballona Lagoon Waterways. The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the "Open Space" designation.
>
> Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, **public facilities**, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

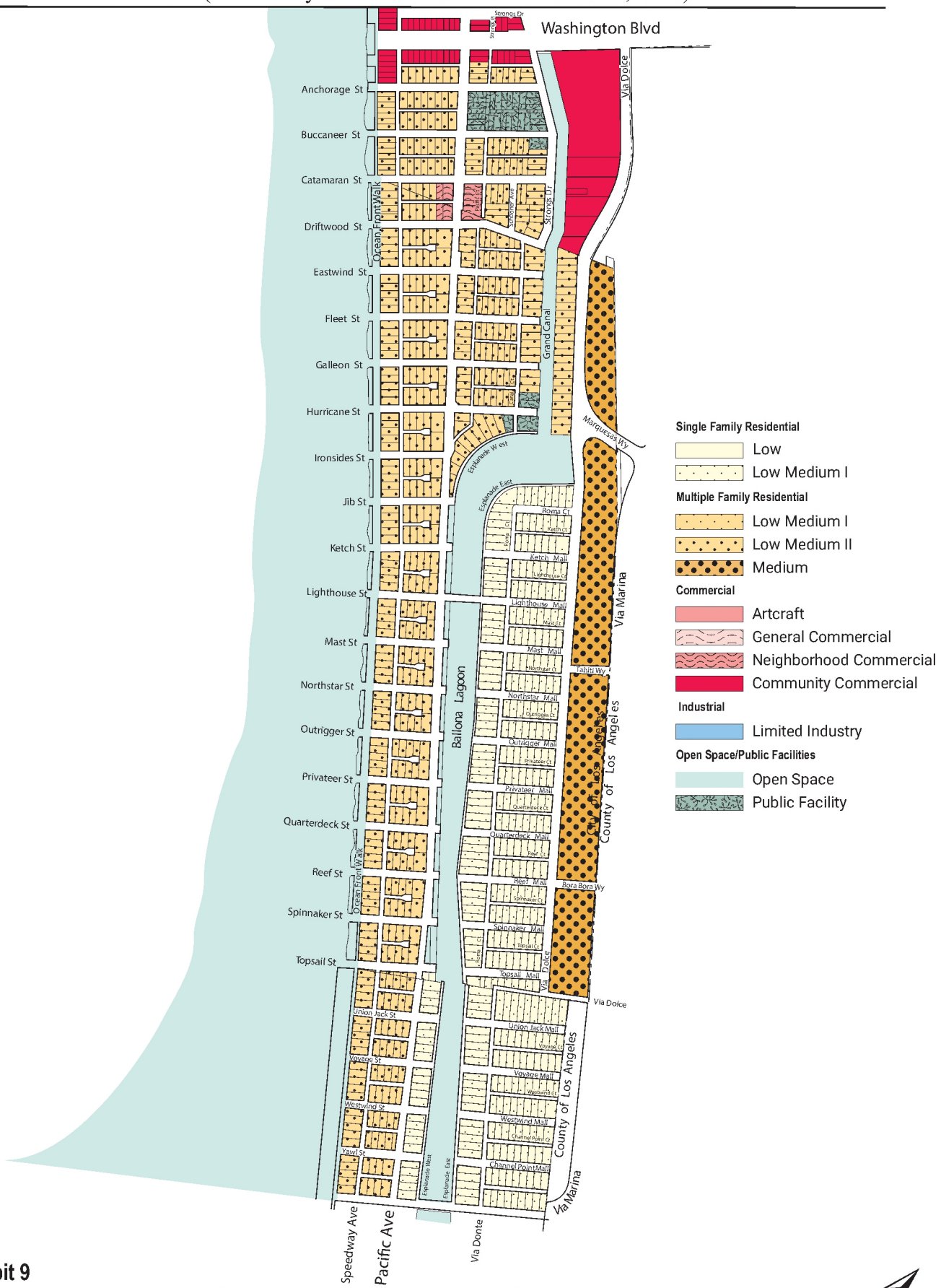


Exhibit 9

Land Use Plan (Map): Marina Peninsula • Silver Strand • Ballona Lagoon West • Ballona Lagoon (Grand Canal) East

N
Not to Scale

Applicant Copy
Office: Downtown
Application Invoice No: 109067

68001109067

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 05/27/2026 with receipt number 200620352090

Applicant: Kenya Lee
Representative:
Project Address: 128 E HURRICANE ST 1-3, 90292

NOTES:

CPC-2024-2010-GPA-ZC-SPPC-CU3-1A			
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 RUBEN VASQUEZ on 5/27/2026

Signature: _____