

## 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 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 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 adjacent 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 Project 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 Project 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.**