CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E Ocean Blvd., Suite 300 Long Beach, CA 90802-4302 (562) 590-5071



Th15a

LCP-5-VEN-22-0038-1 (VENICE DELL HOUSING PROJECT)
SEPTEMBER 6, 2022
CORRESPONDENCE

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 3:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Dawn Hollier <dlhollier@gmail.com> Sent: Tuesday, August 30, 2022 3:36 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

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Hello Coastal Commissioners! Thank you for taking a closer look at this project, which will be under water before its useful life is up.

You have the opportunity to STOP an outrageously harmful and expensive project, and all you have to do is FOLLOW THE MONEY.

Blessings on you all!

Dawn

Dawn Hollier http://sparkleyard.com/ (310) 463-1706

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Selga Sanders <sanderstorm@ca.rr.com> Sent: Tuesday, August 30, 2022 10:11 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Selga Zanders

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 3:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Patricia Rickles <patricia_rickles@yahoo.com>

Sent: Tuesday, August 30, 2022 3:30 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely, Patricia Rickles 2510 Grand Canal Venice 90291

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 3:17 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Jody Brockway < jodybrockway@gmail.com>

Sent: Tuesday, August 30, 2022 3:16 PM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Hello,

I am writing to express my 100% support of the Venice Dell project. As a resident of Venice for 24 years, I think we need this development and should NOT delay the process any further.

Thanks for listening!

Jody Brockway

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:41 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Tuesday, August 30, 2022 2:40 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: Chris C <chriscfilter-marinadelrey@yahoo.com>

Sent: Tuesday, August 30, 2022 2:15 PM

To: SanDiegoCoast@Coastal < SanDiegoCoast@coastal.ca.gov >

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners -

Regarding the Venice / Dell project - I support the motion to extend the deadline for Commission action on this project with proper investigation into the plans. It has been continuously rammed through, leapfrogging various important steps. Numerous environmental issues have been exposed. The City has bypassed environmental review. The Coastal Commission should fulfill its obligation to protect the coast, its residents and its visitors from reckless development, ensuring this project is properly sized, provides proper parking and serves the community the way that it should. It should NOT be pushed through simply because Becky Dennison and Mike Bonin want it done. Becky stands to make millions. Mike is a lame duck. Both have presided over this totally bungled project. Both should have been removed from the process and their hands removed from our city lots.

Please investigate the more than 20 critical items in question, including its oversized scale and scope, environmental review, public access, the ridiculous parking situation, and the nature of the financial arrangements involving the developers.

The project initially called for units for artists and extremely low-income housing, that has since changed. Why are we only getting only 68 units of permanent supportive housing, with only 7 units reserved for Extremely Low Income? Why are we helping VCHC create owned assets without making them fully support the population we need them to support?

Please determine why this is located in a FEMA-designated flood zone, why it needs to construct a massive bell tower, and why the parking structure has utilized the ridiculous mechanical lift plan to satisfy responsible parking for beach goers. This isn't a car storage facility.

And who are the actual project applicants - why isn't the City a co applicants with VCHC and HCHC? Why not LADOT? Why is LADOT involved in funding and OWNING portions of a project that leapfrogged rules via AB1197, meant to speed up the approval process of housing for the homeless. LADOT does homeless housing?

Why are they not required to include proper setbacks to properly improve our sidewalk areas they want to use? Does the project have flood insurance?

The City Council should NEVER have approved this site, as it is not underutilized city property but rather Open Space, Dual Coastal Zone, on the Venice Canals, a block from the beach and Boardwalk, currently used for critical visitor parking, and you, the Coastal Commission, specifically designated the site for future expansion of visitor parking and recreational use, in the certified LUP. If there is a suggestion that should change, it should be done responsibly, and after all this time there should be no questions left. VCHC has failed to do the proper homework on this. Now that a responsible party is involved, I ask that you do your due diligence

Thank you.

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:40 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Tuesday, August 30, 2022 2:39 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: Aneez Lakha <aneezlakha@gmail.com>
Sent: Tuesday, August 30, 2022 2:06 PM

To: SanDiegoCoast@Coastal < SanDiegoCoast@coastal.ca.gov >

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Aneez Lakha

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 16a - Application No. A-5-

VEN-22-0012 (Place Holder DP, LLC, Venice)

From: Jill Howe-Vercos, M.A., MFT <venicemamacita@gmail.com>

Sent: Tuesday, August 30, 2022 10:09 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 16a - Application No. A-5-VEN-22-0012 (Place

Holder DP, LLC, Venice)

Dear Commissioners,

We are 30+ year stakeholders in Venice and we strongly support the motion to extend the deadline for Commission action for up to a year on the City of L.A. request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents, and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely, Michael & Jill Vercos Venice, CA

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From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: alia congdon historify@yahoo.com Sent: Tuesday, August 30, 2022 2:26 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

While permanent supportive housing and affordable housing is desperately needed in Venice specifically and Los Angeles as a whole, I am concerned about the environmental damage being done to property located so closely to the ocean.

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Alia Congdon

50 year Venice Resident

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: rick cox <rickcox9@yahoo.com> Sent: Tuesday, August 30, 2022 2:17 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Richard A. Cox

Venice resident and home owner of almost 30 years.

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Daryl Barnett <daryl.barnett@yahoo.com>

Sent: Tuesday, August 30, 2022 2:15 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Daryl Barnett

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Tuesday, August 30, 2022 1:47 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: Brian Finney < bhfinney.com Sent: Tuesday, August 30, 2022 1:40 PM

To: SanDiegoCoast@Coastal < SanDiegoCoast@coastal.ca.gov >

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Brian Finney 448 Rialto Avenue Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:32 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on Sept 22 Agenda item Thursday 15a-City of Los Angeles LCP-5-

VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project) Time Extension

----Original Message-----

From: brigitte hanson <brigitteahanson@gmail.com>

Sent: Tuesday, August 30, 2022 1:40 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on Sept 22 Agenda item Thursday 15a-City of Los Angeles LCP-5-VEN-22-0038-1 for the Venice

segment (Venice Dell Community Housing Project) Time Extension

Dear Commissioners,

We have a home at 2405 Grand canal. I strongly support the motion to extend the deadline for Commission action to a year on the request to amend the Venice City land Use plan. I have numerous issues with modifying the development standards for the 40 lot mixed use project so close to the beach on the Venice canals.

I have written before about my concerns of copious environmental impacts that have been exposed. These need to be fully studied. We depend on the Coastal Commission to protect the fragile coastline from brash development. The city has bypassed environmental review by using erroneous legislation.

Thank you for your diligence in protecting the coast and the residents and visitors who share it. The politicians pushing this project do not have the public's interest in mind.

Sincerely,

Brigitte and Hart Hanson

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:32 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Susannah Breitbart <susie.breitbart@me.com>

Sent: Tuesday, August 30, 2022 1:39 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I am writing to express my strong support of the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Susie Bean Breitbart susie.breitbart@me.com

2606 Grand Canal Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:32 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Lucas < lucase.king3@gmail.com> Sent: Tuesday, August 30, 2022 1:29 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Hello Commissioners,

We need to extend the deadline for the commission action. There are multiple environmental issues with the land use plan that need additional time to be investigated. As a Venice resident, I strongly support the motion to extend the deadline for the Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Thank you for your due diligence,

Lucas King

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:32 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Tuesday, August 30, 2022 12:58 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: JILL TRAUB < jillousa@gmail.com > Sent: Tuesday, August 30, 2022 11:46 AM

To: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Jill Traub

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:32 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Tuesday, August 30, 2022 12:57 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Hello,

San Diego received some public comments that are meant for you. One more will be sent after this one...

Thank you!

From: Pamela MIchaels < pamelamichaels@ca.rr.com >

Sent: Tuesday, August 30, 2022 10:26 AM

To: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Cc: Pamela MIchaels < <u>pamelamichaels@ca.rr.com</u>>

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners-

My husband and I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

A land use change of this nature needs to be thoroughly studied to determine adverse ramification and unintended environmental issues that may expose the community to major problems going forward and should be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the communities best interest in mind.

Sincerely,

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:32 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Peter Koenig <petrex8@hotmail.com> Sent: Tuesday, August 30, 2022 12:56 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it.

Sincerely,

Peter Koenig 231 Sherman Canal Venice, CA 90291

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:33 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Geri-Ann Galanti <ggalanti@mac.com> Sent: Tuesday, August 30, 2022 12:34 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development. Really, the whole idea of this development is insane.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Geri-Ann Galanti

Venice resident and homeowner since 1981

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:33 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Darryl DuFay <darryldu@pobox.com> Sent: Tuesday, August 30, 2022 12:30 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Darryl DuFay Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:33 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Dionne <daarsen@yahoo.com>
Sent: Tuesday, August 30, 2022 12:27 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic or environment's best interest in mind.

Sincerely,

Dionne Aarsen

10+ year Venice Beach resident and home owner

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:33 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Darryl DuFay <darryldu@pobox.com> Sent: Tuesday, August 30, 2022 12:26 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Darryl DuFay Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:33 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Bill Shinderman < bill@shindermanlaw.com>

Sent: Tuesday, August 30, 2022 12:18 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners:

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals. As a long time resident of the canals, this proposed development directly impacts me and my family and I believe it merits a thorough investigation before any approvals are granted.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development that has not been thoroughly studied.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Bill Shinderman, Esq.

Law Offices of Bill Shinderman, a Professional Corporation 333 Washington Blvd., #605 Marina Del Rey, California 90292 Telephone: (424) 228-2202

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:34 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Helen Fallon <helenandbertfallon@gmail.com>

Sent: Tuesday, August 30, 2022 12:05 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners: Please vote to extend the deadline. This massive project, consolidating 40 lots within 2 blocks of the beach for an immense mixed use project, will eliminate much needed parking and access for Coastal visitors. A project of this scale requires a thorough review. To date, the City of Los Angeles has gone out of its way to give this project preferential treatment including lobbying to get this exempted from environmental reviews.

Thank you,

Helen and Bert Fallon Venice Residents for over 45 years

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:34 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: bhenrick@g.ucla.edu <bhenrick@g.ucla.edu>

Sent: Tuesday, August 30, 2022 11:48 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

I strongly object to this monstrosity project in this coastal community of tsunami warned area.

Additionally, this project It is not echo friendly here.

Kindly reject this project here.

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:34 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Attachments: MIKE-BONIN-Failure.docx

From: synergyprods@yahoo.com <synergyprods@yahoo.com>

Sent: Tuesday, August 30, 2022 11:41 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners:

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals. This project needs serious review.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

In addition, as a 20 year Venice Beach resident, homeowner and business owner, I KNOW THIS PROJECT will cause more harm to our already suffering neighborhood with increase in unsafe homeless, mentally ill, increase in crime, drug use, burglaries and crime.

This will also hurt small business owners and the public who need these parking lots to enjoy our Venice Beach recreation and support small businesses in the neighborhood.

We already have many failed housing projects of Mike Bonin's in our Venice Neighborhood. As the BONIN RECALL showed, 36 thousand residents no longer trust councilman Mike Bonin and his failed policies and this Median project must be thoroughly investigated.

Attached is a document outlining all of the problems the Venice neighborhood has faced with his failed BRIDGE HOUSING project. We do not wish for more of our tax dollars to be wasted in failed projects that cost millions and have no oversight with mandatory drug addiction and mental health therapy. You can see the problems we already face with his failed Bridge Housing and the increase in crime and national news articles showing that Venice is unsafe and overriden with crime, assaults and violence from his last project.

Thank you for your do	ue diligence ii	n protecting the	Coast and th	ne people	who share	it from	politicians
who do not have the	pubic's best i	nterest in mind.					

Sincerely,

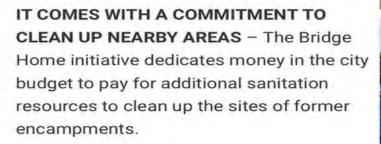
Mr. Ramos 20 Year - Venice Resident - Homeowner - Business Owner

MIKE BONIN'S BRIDGE HOUSING IS A FAILURE:



RESIDENTS WILL BE GOOD NEIGHBORS -

Each temporary housing facility built as part of the Bridge Home initiative will be required to abide by rules that protect neighbors from any nuisance. There will be on-site management and on-site security, and opportunities for neighbors to discuss other operational rules before the facility is opened.



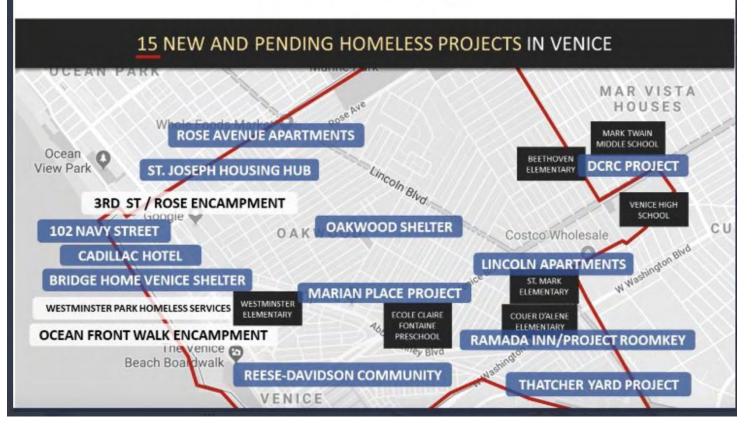


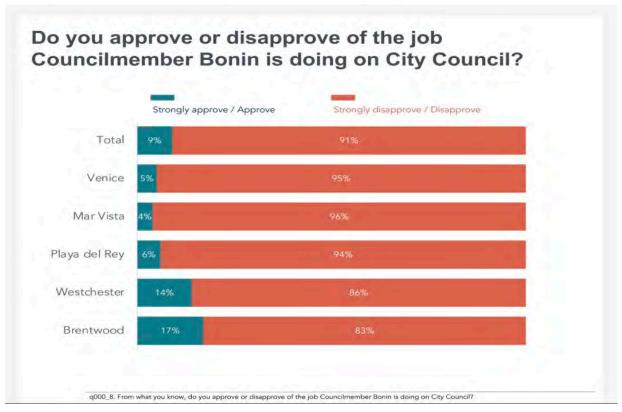




Crime	2019	2021	Change
ARSON	389	598	54%
ASSAULT WITH DEADLY WEAPON, AGGRAVATED ASSAULT	10083	11904	18%
ATTEMPTED ROBBERY	1136	1048	-8%
BATTERY - SIMPLE ASSAULT	17807	15028	-16%
BATTERY WITH SEXUAL CONTACT	1142	785	-31%
BIKE - STOLEN	2294	1959	-15%
BRANDISH WEAPON	2698	3141	16%
BURGLARY	11723	11010	-6%
BURGLARY, ATTEMPTED	976	752	-23%
CRIMINAL HOMICIDE	241	363	51%
CRIMINAL THREATS - NO WEAPON DISPLAYED	4710	4021	-15%
DISCHARGE FIREARMS/SHOTS FIRED	415	656	58%
INDECENT EXPOSURE	376	238	-37%
KIDNAPPING	148	181	22%
OTHER ASSAULT	979	946	-3%
PICKPOCKET	185	108	-42%
RAPE, FORCIBLE	915	752	-18%
ROBBERY	7825	6756	-14%
SHOPLIFTING - PETTY THEFT (\$950 & UNDER)	5335	2686	-50%
SHOPLIFTING-GRAND THEFT (\$950.01 & OVER)	930	557	-40%
SHOTS FIRED AT INHABITED DWELLING	220	360	64%
SHOTS FIRED AT MOVING VEHICLE, TRAIN OR AIRCRAFT	57	155	172%
THEFT FROM MOTOR VEHICLE - ATTEMPT	116	229	97%
THEFT FROM MOTOR VEHICLE - GRAND (\$400 AND OVER)	3605	6781	88%
THEFT FROM MOTOR VEHICLE - PETTY (\$950 & UNDER)	9473	7431	-22%
THEFT PLAIN - PETTY (\$950 & UNDER)	14242	9863	-31%
THEFT-GRAND (\$950.01 & OVER) EXCPT, GUNS, FOWL, LIVESTK, PROD	7309	5765	-21%
VANDALISM - FELONY (\$400 & OVER, ALL CHURCH VANDALISMS)	11940	12654	6%
VANDALISM - MISDEAMEANOR (\$399 OR UNDER)	7075	5873	-17%
VEHICLE - STOLEN	14145	21489	52%

BONIN'S PLAN TO MAKE VENICE A HOMELESS HUB





WORLDWIDE NEWS COVERAGE OF VENICE HOMELESS PROBLEMS AND CRIME:

POLICE REPORT 90% OF VENICE HOME BURGLARY IS HOMELESS RELEATED

https://www.westsidecurrent.com/news/90-percent-of-venice-home-burglary-arrests-this-summer-homeless-related/article d1998146-2275-11ed-8449-

3ff06b3c0b5e.html?utm_medium=social&utm_source=twitter&utm_campaign=user-share

Crime Ranking					
			Last Month Dast Yea		
Rank	Crime Type	Crime Count	Change in Rank		
1	Miscellaneous Theft	38	+1		
2	Vandalism	26	+2		
3	Car Theft	23	+3		
3	Assorted Assault	23	+0		
5	Theft From Vehicle	20	-4		
6	Burglary	18	-1		
7	Assault with A Deadly Weapon	16	+0		
8	Bike Theft	15	+0		
9	Domestic Violence	12	+2		
10	Trespassing	7	+5		

Venice median project –

https://www.westsidecurrent.com/news/appeals-reveal-extent-bonin-vchc-went-to-push-venice-median-project-approval/article_8fbd6fc8-233b-11ed-9bb7-e75824e2047f.html

VENICE NEIGHBORHOOD GROUP - https://www.fightbackvenice.org/monster/

https://www.westsidecurrent.com/news/homeless-brawl-on-venice-boardwalk-makes-national-headlines/article c3472776-18fa-11ed-8cab-9bb7d4893ca8.html

BONIN Profit from homeless:

 $\frac{https://californiaglobe.com/articles/who-has-profited-from-the-homeless-crisis-financially-and-politically/$

POLICE REPROT 90% OF VENICE HOME BURGLARY IS HOMELESS RELEATED

 $\underline{https://www.westsidecurrent.com/news/90\text{-percent-of-venice-home-burglary-arrests-this-summer-homeless-related/article}\ d1998146\text{-}2275\text{-}11\text{ed-}8449\text{-}$

<u>3ff06b3c0b5e.html?utm_medium=social&utm_source=twitter&utm_campaign=user-share</u>
L.A. officials let homelessness overwhelm Venice =

 $\frac{https://www.latimes.com/opinion/story/2021-07-15/los-angeles-officials-let-homelessness-overwhelm-venice}{overwhelm-venice}$

CBS NEWS - Tents return to Venice Beach after massive homeless encampment cleared last year

https://www.cbsnews.com/losangeles/news/tents-return-venice-beach-massive-homeless-encampment-cleared-last-year/

Violent crime and verbal abuse at Union Station have become unbearable for workers https://www.latimes.com/homeless-housing/story/2022-04-29/assaults-at-union-station-strike-fear-in-janitors-and-retail-workers

Villanueva calls for stepped up homeless enforcement on L.A. County transit https://www.latimes.com/california/story/2022-05-25/villanueva-calls-for-stepped-up-homeless-enforcement-on-la-county-transit

Given a chance to avoid jail and criminal charges, mentally ill, addicted and homeless people in L.A. pass

https://www.latimes.com/california/story/2022-05-20/given-chance-to-avoid-jail-and-criminal-charges-mentally-ill-addicted-and-homeless-people-in-l-a-pass

Local News Caught On Camera: Venice Family Threatened With Violence By Man Allegedly Living In Encampment Across From Their Home ATLANTA - Caught On Video: Brawl On Venice Beach Boardwalk https://www.cbsnews.com/losangeles/news/caught-on-camera-venice-family-threatened-with-violence-by-man-allegedly-living-in-encampment-across-from-their-home/

https://atlanta.cbslocal.com/2021/07/30/venice-beach-brawl-boardwalk-video/

DAILY MAIL – **UK** - Desperate Venice Beach residents threaten to sue LA officials for MILLIONS for putting their lives at risk by refusing to crack down on growing homeless encampments and unchecked fires

https://www.dailymail.co.uk/news/article-10496543/Venice-Beach-residents-blast-LA-officials-ignoring-safety-homeless-encampments-grow.html

Los Angeles Goes to War With Itself Over Homelessness https://www.nytimes.com/2021/07/13/magazine/los-angeles-homelessness.html

https://www.recallbonin2021.com/ - Councilmember Mike Bonin has consistently made promises to his constituency and failed to follow through on these promises since he took office. He has implemented projects, bundled with conditions, which he has failed to deliver. When confronted with these broken promises, project failures, and policy issues, Councilmember Bonin has ignored constituent concerns. He promised to remain available, yet refuses to return calls or correspondence. In doing so, Councilmember Bonin has abandoned his constituents and ignored their pleas for help. Instead, he continues to push for and implement his flawed strategies throughout our communities. Council District 11 has suffered loss of life, destroyed livelihoods, and now faces a massive humanitarian, public health, and public safety crisis. Councilmember Mike Bonin is not solving these problems. These broken promises have caused his constituents to lose faith in Councilmember Bonin's leadership.

TRANSPARENT CALIFORNIA

California's largest public pay and pension database

Michael J Bonin Council Member (2018)

Note: From 2011-2017, the "total benefits" value reflects only the employer-cost of health benefits.

Regular pay: \$206,011.93

 Overtime pay:
 \$0.00

 Other pay:
 \$735.55

 Total pay:
 \$206,747.48

Benefits: \$78,926.00 **Total pay & benefits:** \$285,673.48

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:34 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Whitney Sander <w@sander-architects.com>

Sent: Tuesday, August 30, 2022 2:33 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

We support this motion wholeheartedly. The project is underplanned, badly designed, extraordinarily expensive, and will not help the people on our streets.

Please pass this motion.

Whitney Sander Principal

sander architects, LLC

3007 Washington Boulevard #208 Marina del Rey, CA 90292 p: 310.822-0300

<u>www.sander-architects.com</u> <u>online brochure</u>

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:35 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Roberto Schaefer < robertoschaefer@mac.com>

Sent: Tuesday, August 30, 2022 11:30 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I am a Venice resident and home owner since 1992 and I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Roberto Schaefer 818½ Superba Avenue Venice 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:35 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Elissa Della Rocca <edellarocca@ca.rr.com>

Sent: Tuesday, August 30, 2022 11:25 AM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners

I write to register my support for the motion to extend the deadline for commission action for up to one year and in reference to the request by the City of Los Angeles to amend the Venice Land Use Plan to modify development standards on a FORTY LOT MIXED USE PROJECT on the Venice canals and one block from the beach.

The city must take seriously the necessity of environmental review to protect the coast, the residents and the visitors to the coast.

Thank you for protecting our coast.

Elissa Della Rocca 42 Paloma Av Venice ca. 90291

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:35 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Leora Barish < leorabarish@gmail.com> Sent: Tuesday, August 30, 2022 11:24 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

As a longtime resident of Venice, CA (since 1978), we remember a time when the Coastal Commission operated in what seemed to us residents an extremely conservative but honest and effectual (sometimes annoyingly effectual!) way to protect the coastal environment from damage and degradation through building and land development. Venice is already overbuilt and overcrowded; the traffic on Lincoln Blvd is already unbearable. And we - that is, you - must consider that climate change will make our home more vulnerable than ever in the years ahead. Therefore, it should be obvious to anyone with a clear mind, that ALL new, large development proposals, public or private, should be categorically denied. Development can and should proceed elsewhere, inland, where it will not impact our treasured coastline. Our coastline, one of the most beautiful and natural in the world, should not be sacrificed to greed or political passions or to short-sighted ignorance.

We strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:35 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Mark Mack <helmutmarkmack@mac.com>

Sent: Tuesday, August 30, 2022 11:15 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

I would like to raise my misgivings on the quality of housing presented and the loss of neighborhood urbanity of this project on this site. As an architect who was academically invested in housing and who also built award winning low rise-high density housing projects on several continents, I am disappointed in the lack of architectural innovation and take issue on the carelessness with which housing as an inspiring human condition is represented here.

While I supporting low income housing in any part of Los Angeles, of which we are lacking in great numbers, I cannot put my support around this particular project.

I have supported previous projects by both the architect and developers, but I find this particular development far below both of their standards.

I am + 30 year resident of the Venice Canals appreciating the density, the publicness and the openness the canals offer to the residents and tourists alike.

Long before I came to live and work in the canals, teaching Architecture and Urban Design at UC Berkeley and UCLA, I was aware of these special urban conditions that are existing in Venice Beach. The variety of urban conditions that define Venice and its creation. Walking streets, Canals, Bridges, small parks, smaller buildings contribute to a pedestrian oriented environment planned and created more than 100 years ago. Also the urban pattern of Venice pre-dates, an alternative, transit-linked, mixed-use urban area that mixes low-rise high- density housing, commercial and retail uses. This small grid of lot sizes, differentiated street sizes and access to recreational uses enables an achievable urbanity near a vast metropolitan infrastructure that is unique and desirable. Especially in current times were sustainability, ecology, downsizing, quality density and urban greening are the goalposts of every new project should aim at, this project misses by far.

The small lot sizes of Venice created an urban density that equals roughly 25 to 35 units per acre, that is a density only achieved in an average 3 - 4 story apartment complex. With this urban condition that is already imprinted in the DNA of Venice it should easy to create interesting housing which emphasizes variety and an illustrious urbanity.

The apparent incompatibility of creating parking for the public and beach access as demanded by Coastal guidelines and the wish and need for affordable housing and special need housing have conspired here to create a toxic project that satisfies neither constituencies.

The current design lacks the basic understanding of quality living in small spaces. Its deficiencies of air and light principles, orientation of units, privacy and innovative layout burdens the project to the point of failure.

The parking garages with tandem and mechanically stacked parking and the use of the entire roof scape for parking cars, defeats the promises of environmentally responsible living conditions.

This dilemma of two opposing ideas, parking garage and small scale living needs to be solved with courage and innovation not with muddling compromises.

It is neither a good parking garage nor a good housing project.

Any Venice projects should reflect and add to the unique character of Venice. The project needs to break the scale and mass of the current design while still complying to some of the program elements inherent in this much needed project.

This could be a project, that ties into the unique urban character of Venice with walk and drive streets, with abundant outdoor space, generous setbacks for bikes and other slow moving transport vehicles, with passageways throughout the project reinforcing a pedestrian and transportation alternative not seen anywhere else.

The variety of scale in current and historic Venice building assemblies is an urban asset in a time where developer greed and hyper gentrification continues to produce extreme cookie- cutter boxes exploding the allowable zoning envelopes. A process that surely destroys the delicate typological balances of Venice's urban uniqueness. This project needs to break up into a collection of buildings, maybe designed by different designers and planners, made of a known scale and allow access across the grain of this unique carpet of early twenty Century metropolitan experimentation.

This maybe impossible in the current configurations of liaisons, this toxic cocktail of client, bureaucracy and wishful programming stifles any creative and architectural ambitions. In a case like this, where laymen opposition and neighborhood resistance is fierce the architecture needs to be the element of least resistance, something many can get behind and support it.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Mark Mack helmutmarkmack@mac.com

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Gustavo Merizalde < tmerizalde@me.com>

Sent: Tuesday, August 30, 2022 10:58 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

This project and it's current approval has been egregious with numerous violations of the standard process and codes.

Thank you for your due diligence in protecting the Coast by insisting on meeting the required standards regardless of a political agenda.

Sincerely,

Gustavo Merizalde

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 16a - Application No. A-5-

VEN-22-0012 (Place Holder DP, LLC, Venice)

From: Jill Howe-Vercos, M.A., MFT <venicemamacita@gmail.com>

Sent: Tuesday, August 30, 2022 10:09 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 16a - Application No. A-5-VEN-22-0012 (Place

Holder DP, LLC, Venice)

Dear Commissioners,

We are 30+ year stakeholders in Venice and we strongly support the motion to extend the deadline for Commission action for up to a year on the City of L.A. request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents, and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely, Michael & Jill Vercos Venice, CA

Wkhtvologolviropicijiczuje ruopilihviliopilikhtvologoviicijikhtp ologozoving 1 lie figuilip olvilopiozvikhutviloj ji Aviji

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: shafferphoto@me.com <shafferphoto@me.com>

Sent: Tuesday, August 30, 2022 10:11 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Alan Shaffer

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Jason Stock <jstock@m3funds.com> Sent: Tuesday, August 30, 2022 10:14 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

As a resident who lives at 300 S Venice Blvd in Venice we are extremely concerned about the environmental issues that this project creates. The project is flawed in nearly every way, but the negative environmental impact is paramount. In particular, the ill-advised parking structure will create an absolute mess of idling vehicles as they struggle with the concept of a parking garage for beach parking. Each gallon of gas burned produces more than 20 pounds of greenhouse gases and the impact on air quality, regional haze, and global climate change should be significant enough for the Commission to not approve this project. As such, I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Thank you for all your efforts in researching the environmental harm of this project.

Sincerely,

Jason Stock

202.246.9200

300 S. Venice Blvd

Venice CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:37 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: John Okulick < okulick@gmail.com > Sent: Tuesday, August 30, 2022 10:15 AM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Sent from John's iPhone.

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

Sent: Tuesday, August 30, 2022 10:16 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind...like outgoing and soon to be indicted councilman Mike Bonin who is deep in the pockets of the would-be developers of this space.

Sincerely,

Benjamin Shahrabani 310-920-0482

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Todd Mesher <tmesher@mac.com> Sent: Tuesday, August 30, 2022 10:19 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has purposily bypassed environmental review using misguided legislation to serve the fast track development of this project, and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Todd Mesher

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Liam Ahern <la@imcollective.com> Sent: Tuesday, August 30, 2022 10:18 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who may not have the public's best interest in mind.

Sincerely,

Liam Patrick Ahern Venice Resident

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Silvia Fabiana Faerman <silff.ba@gmail.com>

Sent: Tuesday, August 30, 2022 10:20 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Silvia F. Faerman

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Karen Jones <khjones1949@yahoo.com> Sent: Tuesday, August 30, 2022 10:26 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

I strongly support the 90-day extension to review the plans for the Venice Dell Project. This monster doesn't belong at this location, and the way CD Councilman Bonin and the compliant City Council has forced it through is disgusting. This project is ill-advised in every way, and needs extensive review. I have been a Venice resident for nearly thirty years and am opposed to this vanity project.

Karen Jones Venice

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: John Okulick < okulick@gmail.com> Sent: Tuesday, August 30, 2022 10:30 AM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

My family are venice residents and support this motion to extend the time for a closer look at the irregularities of the \$1,000,000 a unit homeless apartments at this location which now serves as an important parking area for recreation so the entire city can enjoy the beach particularly in the summer. Access to our beaches has dinenished to the point that older communities like ours with narrow and walk streets with limited parking are preventing families the opportunity to enjoy this precious resource. This project is a disaster and public land should not be given to private developers to exploit for political reasons. Thank you for considering.

The Okulick, Shaeps, and McDonnel families.

Sent from John's iPhone.

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Philip Lunn <pklunn@gmail.com> Sent: Tuesday, August 30, 2022 10:34 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Philip Lunn--

Philip Lunn +1 310 985 9202

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: mark martin <marlin1mark@gmail.com> Sent: Tuesday, August 30, 2022 10:36 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I have never sent a comment before but I so strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development. This would indeed be a reckless development with terrible consequences.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Sheryl Martin

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 2:36 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Steve Sanders <stevesanders497@icloud.com>

Sent: Tuesday, August 30, 2022 10:50 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Steve Sanders

Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 4:17 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Allen Edwards <allen@pretendllc.com> Sent: Tuesday, August 30, 2022 4:13 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners,

I strongly support the motion to extend the deadline for the Commission action for up to one year on the City of LA request to amend the the Venice Land Use Plan to modify development standards for a 40-lot mixed use project one block from the beach on the Venice Canals.

The City has tried to bypass the environmental review and fastback this project, also bypassing traffic concerns, excessive costs, and a large local opposition to the development.

I'm very happy to see the Coastal Commission is aware of the issues and taking the time to do due diligence is examining the case.

Regards,

Allen Edwards

231 Howland Canal Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 4:18 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Andrew Clark <andrew.clark.1727@gmail.com>

Sent: Tuesday, August 30, 2022 4:17 PM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Thank you so much for delving into this massively oversized and under scrutinized project. Our community has raised a ton of concerns regarding this project, from insufficient and inefficient public parking for citywide beach goers, to excessive height, to the use of a children's park on the canals as the main open space for the development (just to name a few). A project of this size requiring a large amount of variances atypical for the area should be open to environmental review.

Thank you so much for digging into a project that the surrounding community has been excluded from.

Andrew Clark 415-225-5996

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 5:27 PM

To: Seifert, Chloe@Coastal

Subject: FW: Comment on Agenda Item 15.a on September 9th Meeting Agenda

Here you go!

From: Ron Orr <ronaldorresq@gmail.com> Sent: Tuesday, August 30, 2022 5:04 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Comment on Agenda Item 15.a on September 9th Meeting Agenda

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

__

Ron Orr 425 Howland Canal Venice, CA 90291

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 5:29 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Here you go!

From: Yolanda Gonzalez <firstmateyo@yahoo.com>

Sent: Tuesday, August 30, 2022 4:46 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Estimados Coastal Commisioners,

Suplico de la manera mas atenta, la extension de un ano, a la investigacion del projecto Dell aqui en Venice.

Ya que no hay en concreto, tal fundacion de estatus y condiciones concretas en la cual este projecto en primeras fue establecido.

Yo vivo a dos cuadras mas arriba de esta localidad de Dell y a mi se me ha impuesto obligatorio un Seguro de Inundacion de \$3,000 dollares por primera vez despues de ser residente de 25 anos. Cuando ha este projecto, ni siquiera se le ha tomado en consideracion, el peligro que esta expuesto a inundarse. Pero mi si se me esta cobrando.

Para yo pelar este seguro,, yo tendria que contratar, a mis investigadores,, y gastar arriba de \$50.000 de estudios, de la cual dentro de mis posibilidades no tengo a mi alcance monetario.

Este projecto de Dell, y ser parte como protesta de este projecto me costo que me incendiaran mi barandal en fuego,,que casi pudo haber esplotado toda la cuadra. Fue a proposito, y los investigadores del Dept. de Bomberos Forencico vieron, la grabación en Camara.

- 1. Suplico,,,, que examinen que necesitamos conservar,, areas abiertas,,,, por una cuasa ambiental... de emergencia, ya que las hemos tenido.
- 2. Necesitamos, , estacionamiento, para nuestros visitantes, que funciona en el presente.
- 3. Nuestros trabajodores necesitan, tambien a donde poner sus automobiles para venir a trabajar...
- 4. Lo que han mantenido muy callado, son los hundimientos

de hoyos,,que derepente aparecen,,llenos de agua del mar,,,ya que tenemos corrientes que corren, debajo de estas calles hacia la

playa. Y este projecto,,quedaria a una cuadra del mar y en peligro de caerse, en su totalidad. Hay un projecto cerca,,que llevan mas de un ano sacando agua,,para hacer una fundacion adecuada. Y se ha suspendido.

Hay muchos factores mas, que ya se les han presentado.

Apoyo la decision de posponer, este projecto con mas investigacion de un ano.

Y si solicitan mas informacion

de mi observacion, ya que vivo

a menos de dos cuadras, quedo disponoble.

Sra. Yolanda Gonzalez

Residente de mas de 25 anos.

Sent from Yahoo Mail on Android

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 5:30 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Another one!

----Original Message-----

From: Noel Johnston <noel.only@verizon.net> Sent: Tuesday, August 30, 2022 4:36 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners:

My husband and I strongly support the motion to extend the deadline for Commission action for a year or more on the City of LA request to amend the Venice Land Use Plan in order to modify development standards for the 40 lot mixed-use development currently called the Venice Dell Community Housing Project (AKA: The Venice Median Project).

This project would be located one block from the Venice Canals on what is now a parking lot. Numerous environmental issues have been brought to light and are of extreme concern to the entire surrounding community; these issues are serious and deserve to be studied rigorously before any action is taken. Although the City has bypassed environmental review, using misguided legislation as its reasoning, we trust that the Coastal commission will fulfill its purpose and obligation to protect the Coast, its residents, visitors, and green space from reckless and irresponsible development.

Thank you for your continued protection of our valuable and irreplaceable coastline and shore, assets which belong to us all.

Respectfully,

Noël and Jim Johnston 25 year Venice residents

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 5:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Another one

From: Anna Roca <annaroca90405@gmail.com>

Sent: Tuesday, August 30, 2022 2:46 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners,

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Analivia Roca

Anna Roca 13108492918

annaroca90405@gmail.com

https://www.linkedin.com/in/anna-roca/

From: SouthCoast@Coastal

Sent: Tuesday, August 30, 2022 5:31 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Another one

From: Anna Roca <annaroca90405@gmail.com>

Sent: Tuesday, August 30, 2022 2:46 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners,

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Analivia Roca

Anna Roca 13108492918

annaroca90405@gmail.com

https://www.linkedin.com/in/anna-roca/

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:15 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Judy Esposito < judy.esposito@msn.com> Sent: Tuesday, August 30, 2022 5:09 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

The MONSTER in the Median is just that. It IS a monster !!!! It's completely wrong for all of the reasons stated by all of us that so vehemently oppose it. Wrong location, costs are abusive to taxpayers, current open space is critical to Venice and beach goers, sea level rise is a real danger and displacing 4 low income families! PLEASE completely deny this horrific abuse to Venice.

Judy Esposito 40 year Venice resident

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:15 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Susan Painter < spainter 226@gmail.com> Sent: Tuesday, August 30, 2022 5:59 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

As a homeowner at 226 Sherman Canal in Venice CA 90291, I am writing to urge the Coastal Commission to extend the 90-day time limit for Coastal action on this project for up to 1 year.

I ask this of the Commission because this project has many potential and very negative impacts on the Venice coastal area and the surrounding community and it deserves to be studied more carefully than it has been thus far by the Los Angeles City Council.

Please note that I am a supporter of development that will increase housing for homeless and vulnerable populations, both in Venice and in the rest of Los Angeles city and county, but I am not a supporter of this proposed project for the following reasons:

- 1. It is much too large and dense for the proposed site, and both the size and the design of this massive structure are out of proportion to the surrounding community development, which is largely residential.
- 2. Even in the current environment of high construction costs, the anticipated costs per housing-unit for this project are extraordinarily high and are not commensurate with the projected benefits.
- 3. Its impacts on the Venice Beach area, on the historic Venice Canals, which is also a wildlife corridor and waterway, and on the surrounding residential communities has not been adequately acknowledged, considered, accounted for or mitigated.
- 4. The arrangements for replacement beach parking are poorly thought-through, unwieldy and inconvenient for visitors and residents alike. These arrangements are unrealistic in terms of both their logistics and their costs, and will create even greater congestion from the large numbers of beach visitors than is already the case for this area of the community.

In addition, the costs associated with the proposed parking arrangements are extremely high, particularly considering the relatively small number of parking spaces that will actually be achieved. Passing these costs along to beach visitors creates financial disadvantage for community members for whom the beach is meant to be a low-cost recreational opportunity open to all. City parking here already costs too much for young people and families.

I appreciate the work of the Coastal Commission and I thank you for reading my comments.

Yours sincerely, Susan Painter 226 Sherman Canal Venice CA 90291

--

Susan Painter 310-699-4811 voice/text

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:19 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Emilweb20 <emilweb20@gmail.com> Sent: Wednesday, August 31, 2022 4:21 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

emil

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:19 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Barclay DeVeau <barclaydeveau@gmail.com>

Sent: Wednesday, August 31, 2022 5:48 AM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov> **Cc:** Barclay DeVeau <bar>

Coastal <SouthCoast@coastal.ca.gov> Coastal

Coastal <SouthCoast@coastal.ca.gov> Coastal

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Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

I've been extremely concerned about the myriad environmental issues that have been exposed, and I believe they must be fully studied, which absolutely cannot be a rushed process. Thus far, it seems the city has bypassed environmental review using misguided legislation and that is very troubling. Those of us who live in LA., who enjoy Venice regularly, who take our visitors to the beautiful Venice coast - we rely on you, the Coastal Commission, to protect us from reckless development.

Thank you for your diligence in protecting our beautiful coast and those of us who share it.

Sincerely,

Barclay DeVeau

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:19 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Sylvia Lavin <sylvial@princeton.edu> Sent: Wednesday, August 31, 2022 6:33 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners -

As an architectural and environmental historian - I spent 30 years on the faculty at UCLA and am now at Princeton University - and long time resident of Venice, I can attest to the negative environmental and social impact of over development and of the ability of some to skirt the regulations designed to protect our city. As a result, I strongly support the motion to extend the deadline for Commission action for up to a year on the city of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

The project is ill conceived, poorly and indeed aggressively designed, lacks proper safeguards for both environmental and social hazards and must be carefully reconsidered. Other cities across the globe, from Miami to Beirut, have introduced carefully designed and appropriately scaled infrastructure that includes housing, parking and social amenities, in ways that have been applauded by local and internal communities and offered as models for environmental protections. Los Angeles, and Venice in particular, has produced among the best architects and planners in the world: there is every reason we should hold ourselves to and expect no less than the highest quality design work possible. The application of creative intelligence is not expensive - it just requires time. You, Commissioners, are the clock, and I plead you to give the process adequate time for review.

Thank you for your work in protecting the Coast and the people who share it.

Sincerely

Sylvia Lavin Professor

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:19 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Arnold Orgolini <arnoldorgolini@gmail.com>

Sent: Wednesday, August 31, 2022 7:16 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

To Whom It May Concern;

As a 24 year Venice Beach resident and one who is very active and concerned about our community I strongly recommend that we no longer delay

a vote on your approval. As you know there has been numerous approvals already from all the LA city departments concerned so it's time to move

forward with no more delays. Thank you for your consideration, Arnold Orgolini

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:19 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Fred Ryan <fred1r@msn.com>
Sent: Wednesday, August 31, 2022 7:56 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Coastal Commission:

I've lived in Venice for 38 years and love the community. This Dell project is not in sync with the feeling of Venice and has been ram-rodded forward by politicians who don't seem to care.....and certainly haven't listened to what the community feels about this. And equally important, in pushing this forward they've bypassed crucial environmental issues as well but won't even think about slowing this project down to properly address these. As a matter of fact they've actively misled and dodged these critical issues and I'm sure you'll be appalled to the extent of this as you delve into this.

You are our only hope to protect us from this reckless type of development from politicians who put their goals and interests above the communities. I ask you please to take a year and vet this issue very carefully. Venice is depending on you.

Sincerely,

Fred Ryan 2718 Strongs Dr. Venice, CA 90291

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:18 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Gary Harris <garyharris.email@gmail.com> Sent: Wednesday, August 31, 2022 8:45 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I am a 32 year Venice Resident. I own and live in my building at 1909 Ocean Front Walk Venice 90291. My house/building is two blocks directly West of this insanely stupid idea of a project. Please do not let insane Mike Bonin and his organized social service industry group build this retarded \$1 million unit facility for the dregs of society here on the beach.

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Gary Harris

310.578.5655

1909 Ocean Front Walk

Venice, CA 90291

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:18 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Wednesday, August 31, 2022 9:31 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Good morning,

Please see below for public comments for the City of LA.

Have a nice day!

Thank you,

Adríana Palato
Management Services Technician
California Coastal Commission
7575 Metropolitan Drive #103
San Diego, CA 92108#

From: Amy McManus, LMFT < ybnrmol@gmail.com>

Sent: Tuesday, August 30, 2022 9:20 PM

To: SanDiegoCoast@Coastal < SanDiegoCoast@coastal.ca.gov >

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Amy McManus

2808 Clune Ave., Venice, CA 90291

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:18 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Amy Bookman <amybook@msn.com> Sent: Wednesday, August 31, 2022 9:33 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

I am a resident of the Venice Canals and own my home at 2213 Grand Canal. I am writing in support of the motion by the Coastal Commission for more time to look into the Venice Dell Project.

Thank you in advance for guaranteeing transparency and oversight to an ill-conceived plan that endangers our coastline, the historical significance of our canals, and the safety of those of us who live and work in this special community. Of particular concern to me personally, is that I have no confidence that this particular project will in any way ameliorate the lives of those living in tent camps along the median. This is a problem that requires a broader solution, for both those living on the streets and beaches of Venice, and for those of us who are fortunate enough to own or rent homes here.

Please allow the Coastal Commission the time they require to thoroughly investigate the history, legality, and effectiveness of this project.

Thank you.

Amy Bookman

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:17 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Terry Ballentine <terryballentine1@gmail.com>

Sent: Tuesday, August 30, 2022 10:07 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Terry Ballentine
Venice
WWW.TerryBallentine.com
BRE#00588883

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:17 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Ron Robinson <outlook_5867725C0D03AF5F@outlook.com>

Sent: Tuesday, August 30, 2022 9:56 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I STRONGLY SUPPORT THE MOTION TO EXTEND THE DEADLINE for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

RON ROBINSON

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:17 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Lisa Coach <gracemail77@yahoo.com> Sent: Tuesday, August 30, 2022 9:02 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Lisa Foux

Long time Venice Canals Resident, Stakeholder and EXTREMELY CONCERNED citizen

Be safe In graciousness

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:16 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: kip pardue <kipkevinian@gmail.com> Sent: Tuesday, August 30, 2022 8:55 PM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Hello All -

My name is Kevin Pardue and I am an immediate neighbor of the proposed development. I STRONGLY SUPPORT this motion to extend the deadline for further studies on this project. The City of Los Angeles and the developers have neglected their duties entirely - there is no oversight, no community input on the project, and no impact statements of any kind have been released. The final plans have not even been submitted to review.

Thankfully the California Coastal Commission is doing it's due diligence. This will highlight the numerous concerns many Venice residents have been speaking of for years.

Thank you for your time

ΚP

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:16 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Jerome Helman <gijerry101@gmail.com> Sent: Tuesday, August 30, 2022 8:53 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

As a 23+ year resident of the Venice Canals (Sherman Canal) and now a retired physician in practice in the area, I have observed increased traffic, crime, homelessness (I have encountered two of my former patients) and diminished safety on the sidewalks and streets (tents, uncontrolled EV and standard bikes and scooters).

There is a serious health issue with the nearby wetlands that do not appropriate mosquito abatement. LA City and County have led the nation in cases and deaths from West Nile virus. I am still in recovery from a near fatal case. The Venice Dell Project will have a population density in a small area that is not safe in this age of COVID and the increased danger of other viruses and infectious diseases, will add more traffic that is not sustainable in this era of drought in a declared tsunami zone.

We need a cogent and more rational local, state and national plan to deal with homelessness and sustainability during the global warming crisis.

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:16 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Alyson Wilson <alyson.wilson@gmail.com>

Sent: Tuesday, August 30, 2022 8:39 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Alyson Wilson

Sent from my iPhone

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 10:15 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Yara Khoury <yara.ky@gmail.com> Sent: Tuesday, August 30, 2022 7:50 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Yara Khoury - Venice homeowner and resident

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 11:22 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Denise Domergue <denisedomergue@mac.com>

Sent: Wednesday, August 31, 2022 10:47 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Denise Domergue 1725 Abbot Kinney Blvd, Venice

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 11:23 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Julien Barthe <jprbarthe@gmail.com>
Sent: Wednesday, August 31, 2022 10:33 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

A Venice local resident.

Julien Barthe

- jprbarthe@gmail.com
- US +1 310 997 6513
- FR +33 7 86 13 19 67

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 11:23 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Mary Shelton <outlook_9E05073C57BA9075@outlook.com>

Sent: Wednesday, August 31, 2022 10:31 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners,

Thank you for your work on the Venice Dell Project. We taxpayers have felt without a voice in this extremely concerning project as LA Councilman Bonin cut corners and rushed it through the city council without listening to any of our concerns. The environmental concerns of this project in a flood zone are unbelievable. And the impracticality of this monster parking mechanical lift that will prevent many people who live too far away to walk from having a place to part and enjoy the beach. WE need help in stopping this! Please help us.

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 11:23 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Sarah Wauters <sarahwauters123@gmail.com>

Sent: Wednesday, August 31, 2022 10:27 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners:

My partner and I strongly urge you to extend the deadline for Commission action for a year or more on the City of LA request to amend the Venice Land Use Plan in order to modify development standards for the 40 lot mixed-use development currently called the Venice Dell Community Housing Project (AKA: The Venice Median Project).

This project would be located over one of the Venice Canals and one and a half blocks from the beach on what is now a parking lot. Around the parking lot are around 20 mature trees in the street parkways and on the site. These trees were planted by Venice residents, some of whom still live in Venice today, some 25 years ago. The cumulative environmental benefit in mature trees is exponential to a young tree, and as such just replacing them is a pale and insufficient solution. At present, there is a plan to remove all those trees. They should be left, and protected, since they are not in the building footprint. I urge the Coastal Commission to require retention and industry standard protection of these trees during construction if the development is permitted to go forward. THIS NEED SHOULD BE CONSIDERED DURING THE EXTENDED PERIOD OF STUDY. This could be achieved by requiring that the demolition permit reflect the trees and include language that prohibits their removal. Heavy fines should also be indicated.

As you also know, the urban canopy of Los Angeles is under extreme pressure as development throughout the basin continues at breakneck speed - A 2017 USC Study found that every neighborhood has experienced 14 - 55% canopy reduction over 10 years*. EVERY tree counts. We have housing pressure, to be sure, but where trees can be retained, they should be. Trees provide the important function, among others, of filtering and slowing down surface water runoff. Much pollution can be diverted from our ocean by maintaining the trees and their tree wells so close to the beach and the canals. Many other environmental issues have also been brought to light and concern the entire surrounding community. I urge the Coastal Commission to fulfill its purpose and obligation to protect the coast, its residents, visitors, and green space from damaging construction. I also urge a cost-benefit analysis on this particular site - we could build many more units just a mile from the beach because of the cost of the land.

Thank you for your continued protection of our irreplaceable coastline, shore, and ocean.

Respectfully,
Sarah R Wauters
Matthew Heyman
Residents of Venice Neighborhood Council District

Sarah Wauters Volunteer, Verdant Venice Group

*Lee, S.J., T. Longcore, C. Rich and J.P. Wilson. 2017. Increased home size and hardscape descreases urban forest cover in Los Angeles County's single-family residential neighborhoods. Urban Forestry and Greening 24.

sarahwauters123@gmail.com

Telephone 917 822 2247

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 1:54 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Michael Maloy <maloytv@mac.com> Sent: Wednesday, August 31, 2022 12:29 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I live two blocks from the proposed development and pass by it every day, noting especially how many happy people from all over Los Angeles use this location as their entry point to Venice Beach.

It is very encouraging that you are accepting comments for your meeting regarding the project, and I hope mine and others will have an impact. Up until now, our voices have not been heard. Over the past two years, I have regularly sent comments to our city council when they met to consider the project. Nothing I or my neighbors have said have been listened to or taken into account.

This is an ill-conceived project that is being rushed through for unclear reasons. Standard regulations and requirements have been ignored. The cost is enormous, will not have any near or long term effect on the issue it proposes to address and will destroy a vital neighborhood.

In addition, numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Mike Maloy Empirical Media 310-962-3122 maloytv@mac.com

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 1:54 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Noel Johnston <noel.only@verizon.net>Sent: Wednesday, August 31, 2022 12:48 PMTo: Sarah Wauters <sarahwauters123@gmail.com>Cc: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Re: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No.

LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Excellent.

On Aug 31, 2022, at 10:26 AM, Sarah Wauters < sarahwauters123@gmail.com > wrote:

Dear Commissioners:

My partner and I strongly urge you to extend the deadline for Commission action for a year or more on the City of LA request to amend the Venice Land Use Plan in order to modify development standards for the 40 lot mixed-use development currently called the Venice Dell Community Housing Project (AKA: The Venice Median Project).

This project would be located over one of the Venice Canals and one and a half blocks from the beach on what is now a parking lot. Around the parking lot are around 20 mature trees in the street parkways and on the site. These trees were planted by Venice residents, some of whom still live in Venice today, some 25 years ago. The cumulative environmental benefit in mature trees is exponential to a young tree, and as such just replacing them is a pale and insufficient solution. At present, there is a plan to remove all those trees. They should be left, and protected, since they are not in the building footprint. I urge the Coastal Commission to require retention and industry standard protection of these trees during construction if the development is permitted to go forward. THIS NEED SHOULD BE CONSIDERED DURING THE EXTENDED PERIOD OF STUDY. This could be achieved by requiring that the demolition permit reflect the trees and include language that prohibits their removal. Heavy fines should also be indicated.

As you also know, the urban canopy of Los Angeles is under extreme pressure as development throughout the basin continues at breakneck speed - A 2017 USC Study found that every neighborhood has experienced 14 - 55% canopy reduction over 10 years*. EVERY tree counts. We have housing pressure, to be sure, but where trees can be retained, they should be. Trees provide the important function, among others, of filtering and slowing down surface water runoff. **Much pollution can be diverted from our ocean by maintaining the trees and their tree wells so close to the beach and the canals.** Many other environmental issues have also been brought to light and concern the entire surrounding community. I urge the Coastal Commission to fulfill its purpose and obligation to protect

the coast, its residents, visitors, and green space from damaging construction. I also urge a cost-benefit analysis on this particular site - we could build many more units just a mile from the beach because of the cost of the land.

Thank you for your continued protection of our irreplaceable coastline, shore, and ocean.

Respectfully,
Sarah R Wauters
Matthew Heyman
Residents of Venice Neighborhood Council District

Sarah Wauters Volunteer, Verdant Venice Group

*Lee, S.J., T. Longcore, C. Rich and J.P. Wilson. 2017. Increased home size and hardscape descreases urban forest cover in Los Angeles County's single-family residential neighborhoods. Urban Forestry and Greening 24.

sarahwauters123@gmail.com

Telephone 917 822 2247

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 1:52 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Wednesday, August 31, 2022 1:15 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: Gerald Selvo < gselvo@outlook.com > Sent: Wednesday, August 31, 2022 1:13 PM

To: SanDiegoCoast@Coastal < SanDiegoCoast@coastal.ca.gov >

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to me and to the community. They must be fully studied. The City has bypassed environmental review using misguided legislation and I and those of like mind rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development. This is most definitely a reckless and misguided development.

Thank you for your due diligence in extending the deadline and thereby protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely

GERALD V. SELVO

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This e-mail is intended only for the specific person or entity to whom it is addressed. It may contain information that is privileged, confidential or otherwise protected by law. If you have received this e-mail in error or improperly please immediately so inform us by phone at 310-968-8559. Except for the foregoing, we request and insist to the full extent allowed by law that you not review, copy, or disclose any of the contents of this e-mail and that you entirely delete it from your system. We will reimburse your costs of doing so. Thank you for your cooperation.

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 1:52 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Wednesday, August 31, 2022 1:40 PM

To: SouthCoast@Coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Hi,

Please see below for public comment in your area.

Thank you,

Adríana Palato
Management Services Technician
California Coastal Commission
7575 Metropolitan Drive #103
San Diego, CA 92108#

From: Christopher Wilkinson <cgwilkinson@gmail.com>

Sent: Wednesday, August 31, 2022 11:20 AM

To: SanDiegoCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

I am writing in support of the motion to extend the 90-day time limit for Commission action on land use plan amendments. This controversial project definitely requires more study as the proposed project would significantly change our neighborhood.

Thank you,

Christopher Wilkinson

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 1:54 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Noel Johnston <noel.only@verizon.net>Sent: Wednesday, August 31, 2022 12:48 PMTo: Sarah Wauters <sarahwauters123@gmail.com>Cc: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Re: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No.

LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Excellent.

On Aug 31, 2022, at 10:26 AM, Sarah Wauters < sarahwauters123@gmail.com > wrote:

Dear Commissioners:

My partner and I strongly urge you to extend the deadline for Commission action for a year or more on the City of LA request to amend the Venice Land Use Plan in order to modify development standards for the 40 lot mixed-use development currently called the Venice Dell Community Housing Project (AKA: The Venice Median Project).

This project would be located over one of the Venice Canals and one and a half blocks from the beach on what is now a parking lot. Around the parking lot are around 20 mature trees in the street parkways and on the site. These trees were planted by Venice residents, some of whom still live in Venice today, some 25 years ago. The cumulative environmental benefit in mature trees is exponential to a young tree, and as such just replacing them is a pale and insufficient solution. At present, there is a plan to remove all those trees. They should be left, and protected, since they are not in the building footprint. I urge the Coastal Commission to require retention and industry standard protection of these trees during construction if the development is permitted to go forward. THIS NEED SHOULD BE CONSIDERED DURING THE EXTENDED PERIOD OF STUDY. This could be achieved by requiring that the demolition permit reflect the trees and include language that prohibits their removal. Heavy fines should also be indicated.

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Thank you for your continued protection of our irreplaceable coastline, shore, and ocean.

Respectfully,
Sarah R Wauters
Matthew Heyman
Residents of Venice Neighborhood Council District

Sarah Wauters Volunteer, Verdant Venice Group

*Lee, S.J., T. Longcore, C. Rich and J.P. Wilson. 2017. Increased home size and hardscape descreases urban forest cover in Los Angeles County's single-family residential neighborhoods. Urban Forestry and Greening 24.

sarahwauters123@gmail.com

Telephone 917 822 2247

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 6:55 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: dvpro@netscape.net <dvpro@netscape.net>

Sent: Wednesday, August 31, 2022 6:51 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Thank you for your time,

I support Item 15A

I wish to submit my <u>strong opposition to the Venice Dell Community Housing Project</u> for all the reasons previously submitted during the appeal process as well as a few of my own.

1. We already have a parking shortage....

As you know, this project is just one block from the beach and is asking for a total occupancy of 420 people with just 61 parking spaces for their tenants, which in my conservative estimate will generate about 200 cars being parked 24/7 on the surrounding streets.

Not only will this impact the residents who currently live here, making locals park blocks away from their homes, but it will have a huge impact on tourists and visitors seeking free parking, my prediction is people who live from Speedway Ave to Ocean Ave/Venice Way will have to park east of Abbott Kinney.

The tenants of this project will have their own cars as well as their many guests who will come to visit and enjoy the beach.

Add another potential 100 cars parked for commercial use on our streets, and we may have to park east of Oakwood Ave, almost a mile away from our homes!

And the tourists will continue to drive around seeking free parking, making traffic even worse, denying coastal access.

Mechanical lift parking, which is prone to break down will be even more prone to breakdowns in the salty environment, how loud and how much vibration will it cause to tenants occupying adjoining units, and how loud will it be to the surrounding community, will it sound like we are living next to a municipal airport?

Then with 140 units, I see no parking area dedicated for deliveries, from food, groceries, mail from USPO, UPS, Amazon and other online retailers, where are they going to park to drop off packages, mail, food, etc, as well as emergency response vehicles

And how about trash removal, there is nothing in the plans I've seen about where trash will be stored and how it will be removed without causing road blockages and increasing congestion.

2. Open Space.

We are already deficient in open space in Venice

This is not just a parking lot, it's open space used by groups of people playing sports like street hockey, badminton, Frisbee, catch football/baseball just to name a few, people utilize this lot for dog walking and play fetch, and my

favorite...Children riding electric cars or learning to skate and ride bikes, as the bike path is too dangerous and streets are unsafe for this activity with the speeding, the congestion and distracted tourists, I will sorely miss seeing excited, young faces after Christmas or a birthday, learning how to use their new toys

Blocking ocean breezes, increasing electricity usage/costs, adding to global warming, then in high wind storms adding to the shear force of wind tunnels on either side, which may cause damage. The project does not utilize these ocean breezes to help cool buildings down adding to global warming with higher electricity usage, due to poor design and limited windows, **Solar access** will also be impacted.

The City claims the Commercial use aspect of this project was a requirement of the CCC.

This area has been zoned for OPEN SPACE for flooding, we are now in a FEMA Flood zone, applicant has not shown proof of flood insurance, rates, etc

Water displacement, site drainage has not been addressed

Where are we going to get water for 140 units, we are in a 1200 year drought with no end in sight, and how will existing infrastructure handle all the sewage generated

Venice is a CONTAINMENT ZONE, with an over concentration homeless housing, service providers, services and low income housing, BLOCKBUSTING is also illegal, we in Venice have done our fair share to help with this City created crisis

3. LA CITY Claims no fiscal impact to the general fund

No one has addressed the fact that the City of LA rents out the lot for staging for film and TV production, the City receive millions of dollars a year in permit fees for filming in Venice and this lot produces most of that income, after 99 years...your talking about billions of dollars of lost income.

Big Rigs/Trucks,

During construction, Big Rigs/Trucks will destroy all roads used, which are already in bad shape due to neglect We've estimated 6,000 to 9,000 heavy truck trips, hauling construction materials in and out, including dirt, concrete, lumber, pipes, etc

Currently as proposed, the Venice Dell Community Housing Project will not be liable for these repairs or repaving of our city streets, this will costs taxpayers millions of dollars

In conclusion, it would be appreciated if we could see a full EIR, which is by law, required under CEQA, so that we may better understand how this project will effect our community, as we have never seen final design, or impacts to community.

I would love to speak with any members, Commissioners or staff about this

Thanks again,

Sean Obrien

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 4:23 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Christopher Wilkinson <cgwilkinson@gmail.com>

Sent: Wednesday, August 31, 2022 3:31 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

I am writing in support of the motion to extend the 90-day time limit for Commission action on the land use plan amendments. This controversial project in Venice definitely requires more study as the proposed development would significantly change our neighborhood. And not for the better!

Thank you,

Christopher Wilkinson 229 San Juan Avenue Venice, CA 90291

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 4:22 PM

To: Seifert, Chloe@Coastal

Subject: FW: Item 15a. September 8 meeting....Please extend the time period for evaluating the effects of this

project on the Historic Venice Canals

From: Marie Hammond <mhamm007@aol.com> Sent: Wednesday, August 31, 2022 4:08 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Item 15a. September 8 meetng....Please extend the time period for evaluating the effects of this project on the

Historic Venice Canals

Dear Commissioners,

Venice is 3 square miles that leaves about 497 square miles of LA City land that can accommodate this project. Why take away LA residents/world travelers 3 square miles of recreation/beach land and destroy the Historic Venice Canals when there

are another 497 square miles of Los Angeles that this project can occupy?

I am so upset that this project has gone so far with the City of Los Angeles. The City should never have any authority over our coast line.

It has no concept of how to maintain/retain our natural resources, especially our coastline.

- 1. This project is too large.
- 2. It is in a flood zone. And it is one of 2 designated Tsunami evacuation paths for Venice.
- 3. It will endanger the Venice Canal system. Venice began with the Venice Canals. The canals are historic.
- 4. There is no Environment Impact Study.
- 5. It is taking away the last open space in Venice. This defies the guidelines that your commission dictated.
- 6. The automated parking structure is a disaster. It will limit how many can visit Venice Beach.
- 7. Is it worth it to house so many people in this huge complex while making it more difficult for all of Los Angeles to enjoy Venice Beach?

Please extend the time you evaluate this disastrous project.

Respectfully Yours,

Marie Hammond 37 year Venice Resident

From: SouthCoast@Coastal

Sent: Wednesday, August 31, 2022 4:21 PM

To: Seifert, Chloe@Coastal

Subject: FW: City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice

Dell Community Housing Project). Time Extension

From: Dee Pack <dee.w.pack@gmail.com>
Sent: Wednesday, August 31, 2022 4:17 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community

Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals. I further commend the coastal commission for the attention they are paying to this large proposed development in a historic zone 1 block by the beach with unique hydrological features (proximity to canals and historic bridge over the canals and boat access ramp).

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation, mainly driven by a single council member's political and developer-driven agenda and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its Venice residents and its visitors to this hugely popular region from reckless development that will block beach access amongst other problems.

Thank you for your diligence in guarding the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Dee W. Pack

310 Tahiti Way, Unit 313, Venice, CA 90292

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 9:29 AM

To: Seifert, Chloe@Coastal

Subject: FW: LCP-5-VEN-22-0038-1 (Item 15A 9/8/22) - PUBLIC COMMENT

Attachments: LCP-5-VEN-22-0038-1 Agenda Item 15 (a).pdf

From: Sharyl Beebe <sbeebe@prismpermits.com> Sent: Wednesday, August 31, 2022 10:57 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: LCP-5-VEN-22-0038-1 (Item 15A 9/8/22) - PUBLIC COMMENT

Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Please see attached letter addressing my comments on the above referenced agenda item.

Best Regards, Sharyl

Sharyl Beebe, AICP, CERT

Prism Permits

PO Box 283 Malibu, CA 90265 310-403-4365

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Prism Permit Expediting

PO Box 283, Malibu CA 90265 Phone: 310-403-4365

Email: <u>sbeebe@prismpermits.com</u>

August 31, 2022

California Coastal Commission 301 East Ocean Blvd. # 300 Long Beach, CA 90802

RE: Sept. 8th agenda item 15(s) entitled LCP-5-VEN-22-0048-1

Dear Commissioners,

I write this to you today in support of your very <u>WISE</u> decision to request extension of the timeframe of the review of the City of Los Angeles proposed Dell project LCP -5-VEN-22-0038-1. This project is in my neighborhood, and I have personally experienced the devastation and horrors of the conditions that other projects like this in our neighborhood have created and exacerbated such as the ABH (A Bridge Home) which is an utter, abject, failure and <u>big ignoble piece of shit</u> causing years of trauma to sensitive receptors in the vicinity and immense strains on our public infrastructure and the police and fire departments. The City of Los Angeles, and specifically one council member (Mike Bonin District 11), are out of control and do not care about the public, correct land uses in correct locations to create an urban cohesive fabric, or ANY of the rules and regulations by which the rest of we citizens must abide in doing development.

I am a highly experienced and respected City planner by trade. Many of you know me from throughout the past two decades here in CA. Though I'm in the private sector for the past two decades (with many years more experience on the inside of local, county, state, and federal government) doing development that works for all involved, government agency staffs call me for advice all the time. Even the Federal Government seeks my counsel from time to time. My comments are not just spoken as a random neighborhood individual, but as a highly trained urban and regional planner (with specialties in environmental and transportation planning), educator, and administrator. It is lengthy but filled with very salient points that need to be reviewed by staff and the Commission. Below I outline my most major concerns in regard to this project, though I have more:

- 1. This project destroys existing single family affordable housing on a scale of largess and I believe violates the Mello act though it says it's replacing housing with housing (yet the Mello act says it has to be of like and same kind and character if you fully read it in regard to displacement). That is a complete lie on the City's part. This project is displacing several long time Venetian families and using the excuse of providing homeless and "affordable" housing which the homeless don't want anyway if they have to follow any rules and the other portion of affordable is not exactly what one would call affordable.
- 2. CEQA was glossed over and never fleshed out fully. This project should have required a full blown EIR (Environmental Impact Report). Numerous sections of the CEQA requisite potential impacts that need review are affected and cannot be slammed through under the guise of emergency for affordable housing or homelessness that is half created by the City allowing people to run around and do drugs that turn people into schizophrenics and vegetables.

The sections affected are: Cultural Resources, Biology, Geology, Noise, Traffic, Public Services, Fiscal Impacts (e.g.: police/fire/social services/public infrastructure), Cultural Resources, Hazardous Materials, Water Quality, and many more requisite sections to be considered carefully. CEQA requires that this information be produced transparently to the public for education on potential impacts and review. To my knowledge, to date, the City of LA has never

submitted the environmental document which under CEQA should be a full blown EIR considering the number of categories with significant un-mitigable impacts to OPR as required under CEQA. It is my understanding that they furthermore did conduct an internal Initial Study and would not release the results thereof to the public.

They claim the affordable housing Categorical Exemption (Cat Ex). This is false bullshit, and you need to know and understand that. CEQA does not provide for a Cat Ex if very significant impacts are found even on something that would otherwise be exempt. They (the City of LA) are using this and abusing it. While it may be a State of CA level mistake having made "affordable" housing exempt while violating every other rule like parking and CEQA and every other setback and height limitation, etc., this fact must be understood. FYI, you cannot force a public transportation system and stupid "road diets" to work simply by doing huge retrofitted density in a city not laid out or designed for that. A public transport system is merely a nice addition, not something that will fully function the way it's supposed to.

3. First and fore most in your consideration of this matter must be the fact that it is within and part of your mandate that brought your agency into existence to not allow development that reduces or takes away public access/parking to the beach. This entire project site is, in fact, the very site selected and put in the CIP (Capital Improvements Program) many years ago to build a public beach access parking structure. The City of Los Angeles has been taking money from homeowners and developers as fee-in-lieu of parking spaces for decades to pay for said parking structure. Ongoing for the past more than two decades, Jim Murez (Venice Neighborhood Council President) has submitted numerous plans to the City of LA time after time to increase parking and create a new destination park for all to enjoy. The City of LA simply ignores this potential daily and does not even consider or respond.

This development takes away pretty much every last opportunity to provide that requisite parking area which was agreed upon by the City of Los Angeles and the California Coastal Commission decades ago. This is an outrage. The City of Los Angeles completely ignores this and its only response to comments about it is that they are employing a little bit of parking. That is arrogant and ignorant.

Furthermore, it commandeers a neighborhood park used by families with small children daily (Linnie Park) and illegally incorporates it into the development as a part of open space requirement. That site was always the intended and designed and mapped location for tourist and resident parking. The City of LA is once again violating all its own rules and misappropriating funds that were specifically dedicated to that site and a parking structure. That is an egregious violation of the tax payer dollars and the public trust. Most of the public does not know this was supposed to be parking because of course the City of LA lies and deceives the public all the time under the guise of the now homeless crisis and "affordable" housing and never provides full information. Now where will the much-needed parking go to address your mandate of providing better access to the public and tourists to the beach?

- 4. The environmental impacts/noise/aesthetics/transportation/fiscal impacts and more are of enormous concern to the surrounding neighborhood and visitors to the area as well (and yes, we talk to tourists daily and learn how much they love the quaint historical nature of Venice). The Venice Boardwalk and surrounding businesses are in the top tourist attractions in the World and bring in millions of dollars per year in revenue to the City of LA due to the very fact and fabric of its well-known quaint and historical nature. This project erodes that very character of the neighborhood and particularly the famous Venice Canals.
- 5. The law within the Historic Landmark Canals specific area is that development must be Single Family Residences and one cannot combine more than three lots. This proposed development violates all the rules and regulations of the Canals code. The project as proposed, folks, is what we call "Spot Zoning" in land use and zoning law. Spot Zoning is absolutely illegal. Nothing adjacent or adjoining the property at hand is very high density multi family. It absolutely cannot be argued that this is not giving special privilege to a developer, and with the current City of LA bid process, a specific social service provider. It is disgusting the lengths to which the City of LA will go to push over the public and run amuck.

Though this is technically 40 long-existing lots and a four-family dwelling, it is proposed to be merged into one lot and then spot zoned from Open Space into Commercial/Residential named Sub Area A and this offensive monstrosity placed upon it wherein it will serve to only further mess up and complicate the existing parking, traffic and tourism issues as well as displacing four long-time Venetian families who also need to maintain affordable housing. As evidence, I submit to you, that VCHC (Venice Community Housing Corporation) went to these four long-time families and invited ONLY them to an event nearby offering snacks and refreshments in an unscrupulous ploy and attempt to move them to new housing that is in an unknown location and manipulate the elderly, disabled, living below the poverty line families with minimal education into signing an agreement to move them and get them off their properties relinquishing their right to their own properties. Thankfully a caring neighbor learned of this and advised them not to attend these shenanigans. I submit this to you to demonstrate the absolute horrendous level and lengths of criminal fraudulent behavior this service provider and the City of LA will go to in efforts to further their atrocious agenda without transparency and public scrutiny.

6. One of the biggest things in the Supreme Court regarding zoning and land use law these days is **TRANSPARENCY** in government. The City of LA has violated so many ethical and moral outrightly outrageous breaking of laws on this project, it is twisted and sickening. In addition, they violate the public trust every day obfuscating facts and hiding the truth behind bureaucratic red tape and nonsense that it has been deemed the most corrupt city in the World. Yes, that's right, you heard me correctly. The madness must stop, and it must stop now. I have long lived by the old ethical rules of life and business...... if there's nothing wrong with what you're doing, then why not tell the truth and put the facts out there transparently?

Hmmmm begs the question does it not? I will also add that they are trying to fleece you as well. You are unfortunately as much a victim in this mess as are we the public. Do not be a victim. Stand up to the City of LA. Did you know? The developers told the City of LA that the commercial aspect of the project was mandated by YOU!! Can you believe that?! I think that is called a big fat LIE. I highly doubt you appreciate having words you never uttered put in your mouth to fleece another agency either. To date, I have found no evidence that proves to me satisfactorily that you indeed did state that to the developer. If it exists, I'd like a copy of it please.

I appreciate your attention to my concerns and listening and taking them seriously as you should too. If you have any questions that I might be able to answer, please advise and I will do so to the best of my ability. It is my hope that you will support the motion to extend the timeframe to review and do a lot of due diligence tearing this thing apart brick by brick to investigate everything the community has stated for years that the City of LA ignored and swept under the rug. Answers must be sought from the City with hardball questions and proof positive in documents of all types of all answers to questions provided for your and staff's review.

Please do not hesitate to contact me. I can be reached at sbeebe@prismpermits.com or 310-403-4365. I have a two-decade track record of working closely with your staff to help them understand things, and I am happy to help you if I can.

Most Sincerely and Warmest Regards,

Sharyl R. Beebe, MA, AiCP, CERT

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 9:33 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Devon Daley <devonne_daley@hotmail.com>

Sent: Thursday, September 1, 2022 5:26 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I am writing in support of the motion to extend the deadline for Commission action (for up to a year) on the City of LA's request to amend the Venice Land Use Plan to modify development standards to permit a 40-lot mixed-use project located on the historic (and environmentally sensitive) Venice Canals; one block from Venice beach.

Myriad issues are at stake. Each are of deep concern, not only to the community who live around the proposed project, but also to those who value continued access to Venice Beach. In spite of this, the City of LA relied on misguided legislation to bypass thorough review of this massive and unprecedented development. We rely on the Coastal Commission to fulfill its obligation to protect the Coastal Zone as well as its residents and the visitors who rely on access to it from unstudied and reckless development.

Thank you in advance for exercising the due diligence that the City of LA failed to perform and for putting the public's interest over narrow political interests

Sincerely,

Devonne Daley

Sent from Mail for Windows

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 9:34 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Brent Massman <massman.brent@gmail.com>

Sent: Thursday, September 1, 2022 8:57 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Thank you, Brent

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 9:34 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Dominique Hirschkron <dominvenice@gmail.com>

Sent: Thursday, September 1, 2022 9:04 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners,

I strongly support the motion to extend the deadline for Commission action for up to a year in regards to the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Dominique & Gary Hirschkron 411 Linnie Canal Venice, CA 90291

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 9:46 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

----Original Message-----

From: Lori Christensen <gunvor3@gmail.com> Sent: Thursday, September 1, 2022 12:22 AM

To: SouthCoast@Coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed CEQA environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Yours sincerely Lori Christensen

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 1:38 PM

To: Seifert, Chloe@Coastal

Subject: Fwd: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Donald Jemison <jemisod@icloud.com> **Sent:** Thursday, September 1, 2022 9:47:56 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Hello Commissioners,

I strongly support this motion to extend the deadline. It finally feels like the local community is being heard - Thank you!!!

Don Jemison, ASA, FLMI, Broker CA BRE #01330503

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 3:05 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Juli Schulz <julischulz@gmail.com> Sent: Thursday, September 1, 2022 12:37 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development. There are so many problems with this development to list here, you can read on our volunteer community website to stop the destruction of our neighborhood and coastal zone - https://www.fightbackvenice.org.

And please note, we are NOT against low income housing, we are against projects that do not take the safety of the current community and future residents top of mind. The developers will be the only ones who benefit from this monster!

Thank you for your due diligence in protecting the Coastline for ours and future generations!

Sincerely,

Juli Schulz Venice Resident Surfrider Foundation Los Angeles Member Climate Reality Los Angeles Member

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 3:05 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Mary Hruska <busdisora@aol.com>
Sent: Thursday, September 1, 2022 11:15 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Mary Hruska

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 3:05 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of LA LCP Amendment

No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time

Extension

From: J Kurland <jjsk7@hotmail.com>

Sent: Thursday, September 1, 2022 10:28 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of LA LCP Amendment No. LCP-5-VEN-22-

0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Hello Commissioners ~

I strongly **support** the motion to **extend** the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we **rely** on the Coastal Commission to **fulfill its obligation** protecting our Coast, its residents and its visitors from destruction by developers and politicians who have pocketbooks, not the pubic's best interest, in mind.

Sincerely,

J. Kurland

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 3:04 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Susan Spivak <susanspivak@outlook.com> On Behalf Of Susan Spivak

Sent: Thursday, September 1, 2022 10:25 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast.

Sincerely,

Susan Spivak

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 3:04 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

From: Susan Spivak <earsispublic@outlook.com> Sent: Thursday, September 1, 2022 10:24 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Sent from Mail for Windows

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast.

Sincerely,

Ed Rucker

From: SouthCoast@Coastal

Sent: Thursday, September 1, 2022 4:44 PM

To: Seifert, Chloe@Coastal Subject: FW: PLEASE SUPPORT

From: Boise Thomas <boisethomas@gmail.com> **Sent:** Thursday, September 1, 2022 4:29 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: PLEASE SUPPORT

To: South Coast@coastal.ca.gov

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Cut and Paste this message.

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA's request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents, and its visitors from reckless development.

Thank you for your due diligence in protecting our coasts and the current and future residents!

With friendly thoughts and thankful wishes,

Boise Thomas, Venice Resident 2002-present

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 9:58 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension



Support Staff

CALIFORNIA COASTAL COMMISSION

South Coast District Office

301 E. Ocean Blvd, Suite 300

Long Beach, CA 90802



If you need to submit an appeal or an emergency application, please email a supervisor and copy: SouthCoast@coastal.ca.gov.

Please note that public counter hours for all Commission offices are currently suspended indefinitely in light of the coronavirus. However, in order to provide the public with continuity of service while protecting both you and our employees, the Commission remains open for business, and you can contact staff directly by email, and regular mail. Phone messages left in the Long Beach office will be returned sporadically. If your matter is urgent, please send an email. In addition, more information on the Commission's response to the COVID-19 virus can be found on our website at www.coastal.ca.gov.

From: Elizabeth Zampolli <studioe11@gmail.com>

Sent: Thursday, September 1, 2022 6:59 PM

(562) 590-5071

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development. There are so many problems with this development to list here, you can read on our volunteer

community website to stop the destruction of our neighborhood and coastal zone

- https://www.fightbackvenice.org.

And please note, we are NOT against low income housing, we are against projects that do not take the safety of the current community and future residents top of mind. The developers will be the only ones who benefit from this monster!

Thank you for your due diligence in protecting the Coastline for ours and future generations!

Sincerely,

Elizabeth Zampolli

Venice Resident

--

Elizabeth Zampolli 323.253.8640

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 10:00 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 agenda item Thursday 15a: City of Lo Angeles LCP

amendment LCP-5-VEN-22-



Krysten Tomaier | Coastal Program Analyst

CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E. Ocean Blvd, Suite 300 Long Beach, CA 90802 (562) 590-5071







If you need to submit an appeal or an emergency application, please email a supervisor and copy: SouthCoast@coastal.ca.gov.

Please note that public counter hours for all Commission offices are currently suspended indefinitely in light of the coronavirus. However, in order to provide the public with continuity of service while protecting both you and our employees, the Commission remains open for business, and you can contact staff directly by email, and regular mail. Phone messages left in the Long Beach office will be returned sporadically. If your matter is urgent, please send an email. In addition, more information on the Commission's response to the COVID-19 virus can be found on our website at www.coastal.ca.gov.

From: LOTHAR W SCHMITZ < lschmitz@ucla.edu> Sent: Friday, September 2, 2022 12:24 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 agenda item Thursday 15a: City of Lo Angeles LCP amendment LCP-5-VEN-

22-

Dear Commissioners-

As a 23 year resident of Venice, I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development. A development of the proposed size that is situated in an area prone to flooding, providing supportive housing at a cost of over \$ 1 million per unit is ill conceived and not a prudent investment or use of public resources and taxpayer assets.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Sincerely,

Lothar Schmitz

Research Physicist

University of California Los Angeles



From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 10:01 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Attachments: Garage Analysis Parking Advisory Group.pdf; Venice Beach Parking Study 8-15-22.pdf



Krysten Tomaier | Coastal Program Analyst CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E. Ocean Blvd, Suite 300 Long Beach, CA 90802 (562) 590-5071



If you need to submit an appeal or an emergency application, please email a supervisor and copy: SouthCoast@coastal.ca.gov.

Please note that public counter hours for all Commission offices are currently suspended indefinitely in light of the coronavirus. However, in order to provide the public with continuity of service while protecting both you and our employees, the Commission remains open for business, and you can contact staff directly by email, and regular mail. Phone messages left in the Long Beach office will be returned sporadically. If your matter is urgent, please send an email. In addition, more information on the Commission's response to the COVID-19 virus can be found on our website at www.coastal.ca.gov.

From: Jeffrey Kavin <jeffrey.kavin@verizon.net>

Sent: Friday, September 2, 2022 2:36 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

The LUP amendment and Venice Dell development would eliminate coastal access for drivers, bicyclists, recreational boaters and pedestrians at Southern California's 2nd most popular tourist attraction and the main beach for California's Largest City.

The Venice Dell development (Previously known as the "Reese Davidson" development) would:

- (1) Raise prices for beach parking to a level that would exclude more than 50% of the City's residents.
- (2) Reduce and permanently cap the amount of parking available for beach access at Venice Beach at a level that is insufficient for existing demand,
- (3) Permanently terminate long standing plans to use a trust fund to build parking structures on the Lot #731 property to expand the beach parking supply at Venice beach,
- (4) Make it impossible for the public to use vehicles and trailers on and near the public boat launch ramp to launch boats for recreational boating in the Historical Canals,
- (5) Eliminate the parking spaces right next to the boat launch ramp where visitors can unload smaller boats and carry them to the ramp,
- (6) Make it impossible to transport recreational boats to the canals using boat trailers by eliminating the existing parking for boat trailers at Lot #731,

- (7) Eliminate the existing bikeway to the beach that Caltrans built on the property and the path through the parking lot which are the only possible safe ways for bike riders to get to the beach on this section of Venice Blvd,
- (8) Force beach visitors to subsidize the developers and their investors with excessively high parking fees to pay for the exceptionally high operating costs and debt service for the parking garage that the developers were supposed to provide,
- (9) Build a mixed use development on the tree lined Canal property that is supposed to be preserved as Open Space for recreation and coastal access under the LUP,
- (10) Block the path that pedestrians use to get to the beach through Lot #731, forcing crowds of visitors onto a substandard minimum five foot wide sidewalk.
- (11) Demolish the existing very low-cost parking lot that can be profitable charging about \$2.50 for all day parking and replace it with parking garage that could have negative cash flow charging about \$32.00.
- (12) Move the entrance to the beach parking garage about 500 feet further away from the beach, eliminating access for many visitors who are elderly or have mobility issues, including the handicapped.
- (13) Move the handicapped parking spaces from a location closest to the beach to the farthest possible location along the far east wall on the parking garage where the people using them would have to cross the driveway traffic for the garage to get to and from the beach in violation of the ADA.

As documented in the Venice Beach Parking Study and Report that I prepared, which is submitted with this comment and incorporated herein by reference, the publicly owned beach parking lots at Venice Beach are filling up and turning visitors away on weekends all summer long and on winter weekends with warm weather in spite of the high exclusionary prices being charged.

The City's decision to go forward with the Venice Dell Development relies upon the June 2020 Tierra West Parking Study prepared for LADOT that concluded that there was no unmet demand for parking at Venice Beach except on Holiday afternoons. As also documented in the report submitted with this comment, the City approved the Tierra West Parking Study when it knew that vehicles were being turned away from Lot #731 on weekends all summer long and that information in the Tierra West study was false and misleading.

As also documented in the parking study submitted with this comment, the City of Los Angeles has repeatedly committed acts to block and discourage coastal access in violation of the Coastal Act in its efforts to enable this development in the Venice Median Open Space. These illegal acts include keeping the gate to the public boat launch locked to the public in violation of the coastal permit for at least 10 years, manipulating prices for parking to prevent and discourage visitors from using the publicly owned beach parking lots, sabotaging the entrance to LADOT parking lot #731 to prevent vehicles from entering and keeping LADOT Lot #701 locked on most days of the year in violation of the Coastal Permit. The justifications for this development submitted by the developers in the Coastal Development Application are based upon the continuation of these illegal practices.

Coastal Commission staff need the extension of time to prepare the staff reports on the LUP Amendment and the proposed development because of the numerous complex and important issues that need to be addressed. I support the one-year extension for the public hearing on this coastal development permit.

Respectfully,

Jeffrey Kavin

Copies of the Venice Beach Parking Study and Garage Analysis are attached to this email and incorporated into this comment by reference.

Links to the exhibits to the parking study can be found here:

https://www.dropbox.com/sh/r2c5olzfeskedmh/AACnNexj3UAxIq60IA7AOXmna?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba?dl=0https://www.dropbox.com/sh/dhy5b4l7f19I9v8/AADhMWAiQKHVs27OF1I4ix5ba.dl=0ht

Venice Dell Housing Project

East Garage for Beach Parking Garage Analysis

Tom Sivak The Parking Advisory Group

Preliminary Report – August 14, 2022

Introduction

The City of Los Angeles has proposed building a mixed-use affordable housing project on the site of LADOT beach parking lot #731. The site, which is part of the Historical Canal system, currently includes the only public boat launch for the canals, a separate parking lot for the public boat launch, the oldest bridge in the City of Los Angeles and four units of low-cost housing.

Lot #731 is used almost exclusively for access to the Beach, Boardwalk and Historical Canals. The developers are required to include replacement parking for these coastal access uses as part of the project.

The Parking Advisory Group has been engaged to analyze the plans for the new public parking garage (East Garage) and related documents for operational issues, suitability for coastal access and for compliance with the provisions of the California Coastal Act.

According to the developers, the proposed garage will be able to receive about 65 incoming vehicles during the peak hours. The Parking Management Plan fails to provide the details about how they arrived at this number. Assuming that this number is correct, it would not be enough to fill the 252-space garage during peak hours or to accommodate the surges in beach traffic that occur when the three public lots on the beach fill up and start turning people away.

Because most of vehicles arriving at this location during peak hours were turned away from the parking lots at the beach, they tend to have a higher-than-average number of occupants per vehicle and a lot of bulky items with them, such as strollers, beach umbrellas, chairs, coolers. bicycles, sports gear, etc. As the new parking structure does not have any dedicated space for loading and unloading, families would have to do this in the busy traffic lanes which would be unsafe and block the flow of vehicles in the garage. The management plan has failed to address the unique aspects of the beach parking demand for this proposed site.

Lot #731 is very inexpensive to operate. It can be profitable charging about \$2.50 for all day parking. With a few changes, the operating cost per visitor could be even less. (Exhibit 1: Exhibit 1 Revenue and Expenses Lot #731) The new parking garage would be extremely expensive to operate. It would cost more than 13 times as much to pay the operating costs and debt service. Exhibit 4 Investment Summary East Garage)

According to the plans submitted with the coastal development permit, the new parking garage would charge a range of \$4.00 to \$15.00 per hour for beach parking. Visitors who agree to accept the parking option that is less convenient, more dangerous and has much longer wait times for arrivals and departures would pay the lower rate. The lowest rate would be too high for many people to afford, which would discourage and prevent beach access for many low-income visitors in violation of the Coastal Act.

For these reasons, and other reasons discussed below, maintaining, and improving the existing parking lot is the only option for this property that would maximize coastal access as required by the California Coastal Act.

Most Relevant Provisions of the California Coastal Act

The following provisions of the California Coastal Act are particularly important in evaluating this project:

Section 30210 of the California Coastal Act provides: "In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs."

Section 30213: "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. ..."

Section 30252: "The location and amount of new development should maintain and enhance public access to the coast by (4) providing adequate parking facilities"

Summary

Pursuant to Section 30210 of the California Coastal Act, this project is required Maximize Coastal Access, which is interpreted to mean that it should expand and improve coastal access. As discussed in this report, the proposed parking garage would significantly reduce coastal access in violation of the Coastal Act.

For purposes of coastal access, the proposed garage would be remarkably inferior to the existing parking lot in almost every conceivable way.

The proposed development would also replace a low-cost beach parking facility with an extremely high-cost facility in violation of Section 30213 of the Coastal Act.

Issues related to the operational viability of the garage design and Parking Management Plan.

- The "Staffing Plan" submitted with the Coastal Development Application shows that the proposed beach parking garage was designed to process about 65 inbound vehicles during the peak hour. (Exhibit 2: Staffing Plan, page 3) This is not adequate for this 252-space beach parking garage. Starting from empty, it would take over 3 hours to fill the garage with a continuous line of vehicles in the street waiting to enter, assuming no vehicles exited. It could take much longer if vehicles exited during the four-hour period or if the line in the street was intermittent.
- •With proper management and revenue control systems, the existing parking Lot could have an hourly capacity for inbound vehicles of up to 250 vehicles per hour using standard PARCS equipment and would be able to fill up from empty in less than one hour as the spaces are all "self-park". Converting the currently closed exit on North Venice Blvd into a second entrance lane would increase the capacity up to 500 vehicles per hour, so that the lot would be able to fill up in 30 minutes if a higher capacity was needed. Lot #731 would be able to fill up to capacity and stay filled during peak hours in a significantly more efficient manner than the proposed parking structure.

- •The July 20, 2019, survey by the City (Exhibit 3: Exhibit 3 Traffic Counts 7-20-2019 Lot #731) showed that an average of 43.5 cars per hour were leaving Lot #731 throughout the afternoon. If that same number left the new parking garage hourly, the number of vehicles parked in the new garage would only increase by about 22 vehicles per hour at the peak hour capacity of 65 vehicles.
- •The plans for the operation of the garage are based upon the assumption that "(3) Attendant's process (20) vehicles each—(60) total per hour." While 3 experienced attendants might be able to handle the movements for 60 inbound vehicles per hour when the garage is not busy, this may not be possible during peak hours if the traffic lanes are obstructed by visitors getting in and out of their vehicles, people waiting for their vehicles and attendants moving vehicles. The Parking Management Plan needs to be revised to include detailed information and calculations to show that 3 attendants can handle the movements for 60 incoming vehicles per hour, including an explanation about how peak hour congestion will be handled and effect the number of incoming vehicles handled by the attendants.
- •The staffing plan details inbound vehicle movement and claims to include outbound movements in these same numbers. ("Outbound vehicles requiring an attendant are taken into account.") This is not correct. Industry standards dictates that all vehicle movements must be identified and quantified. The current plan fails to provide this level of detail. All stacker vehicles and most tandem spaces will require valet/attendant activity on both inbound and outbound trips. This will significantly reduce the currently stated capacity of the valets below that stated in the Staffing Plan. The Staffing Management Plan needs to be revised to include detailed information documenting the capacity for outgoing vehicles. The current staffing plan is clearly inadequate to manage the beach traffic currently experienced in Lot #731.
- •The design of the parking garage does not include a passenger loading area for incoming vehicles and outgoing vehicles. Visitors would have to unload their vehicles, wait for the return of their vehicles, and load their vehicles in the traffic lanes with attendants driving vehicles at them from all directions, all of which would be dangerous. Vehicles and families waiting, unloading, and loading in the traffic lanes would block the flow of traffic in the garage, significantly reducing the number of vehicles that the attendants could process per hour.
- There is a high probability that the parking garage will experience gridlock during peak afternoon hours for beach traffic. This would likely force the operators to close the parking structure to inbound traffic limiting the use of the garage during peak times and result in very long waits for people looking to exit the garage.
- According to the Permanent Public Parking Plan Narrative submitted with the Development Application and the entitlement documents, the parking for the commercial uses at the development are supposed to be provided at the West Garage shared with the resident's parking, not at the garage for beach parking. Instead of including plans to implement this, the Parking Management Plan provides for free validated parking for restaurant and retail customers in the beach parking garage. This will reduce the number of parking spaces available for coastal access by 42 spaces, possibly more.
- •The peak lunch hours for restaurant traffic would overlap with the peak hours for beach visitors, which would further reduce the maximum number incoming of beach visitors during this key period. If the commercial spaces turned over 1.5 times from noon to 2 pm, the number of incoming vehicles belonging to coastal visitors would be reduced by about 50% or more.

- Visitors using the Valet attendants would experience long waits for the return of the vehicles. This compares to Lot #731, where the 3 unobstructed exits provide a quick exit.
- •The attendants at the proposed parking garage would need a lot of time to return the vehicles in an emergency like a weather event beach closure, concert or special event where a full garage would have to be emptied in a short period. It would take more than 2 hours to empty the garage if 252 cars needed to leave at the same time This is not acceptable for this location. Lot #731 would be able to handle these situations easily.
- Like many other industries, parking lots are experiencing increasing costs and competition for labor and a severe labor shortage. Many parking lots have reduced hours, and valet lots have had to raise prices and/or throttled back volume because of staffing shortages. Staffing shortages, where the facility will be forced to operate with a reduced staff can affect the operation of the proposed parking structure with severe impacts on the number of vehicles that can be parked for coastal access. As Lot #731 could easily be automated so that it would operate with little or no staff, inflation would have a much smaller impact on prices over the 99-year term of the ground lease than at the new parking garage.
- Employee turnover at the proposed garage would make it difficult to operate the garage effectively, with a significant impact on its use for coastal access. Valet attendants for parking lots using car stackers need to have special skills. New employees would have to learn these skills on the job. These skills take a long time for most people to learn and increase the risk of vehicle damage due to inexperienced stacker valets. Inexperienced attendants would also impede the operation of the garage and the hourly capacity. To the extent that staff was required at Lot #731, because it is a self-park facility a new attendant could be replaced quickly and could perform the job with very little training.
- There is no provision for an onsite security person in the Investment Summary or in the Parking Management Plan. At least one onsite security person should be required during all business hours in this high crime location to monitor security cameras and walk the property and stairwells.
- •The problems caused by the failure to provide any space in the garage for people waiting for the return of their vehicles could escalate as the number of people waiting in the traffic lanes increased. Assuming an average of three people per vehicle, you would have 60 people waiting in the traffic lanes for their vehicles if the attendants had 20 vehicles to retrieve from the 252-space garage. Visitors waiting for the return of their vehicles would impede or block the flow of vehicles in the traffic lane, which could cause the backlog of vehicles to get much worse. The parking management plan has failed to address this important safety and operational concern.
- •Self-parking is the much-preferred option to maximize coastal access compared to the use of Valet Attendants, especially at high demand beach locations. Many beach visitors avoid the use of valet parking because they are afraid of theft and damage to their cars, cannot afford the elevated fees, do not want to pay a tip to the attendant and/or do not want to wait to surrender and retrieve their vehicles.
- Families going to the beach spend a lot of time in the parking lot socializing and getting ready for the beach, unloading, and organizing children, strollers, toys, sports gear, umbrellas, coolers, etc. They also gather and socialize with friends and family that meet them in the parking lots. People also get ready for the beach in the parking lot, changing clothes, applying skin protection, setting up bikes etc. All these activities would be very problematic in the proposed garage.

- •Lot #731 and the boat launch parking lot can accommodate more than the 252 spaces claimed at the proposed Parking garage if they had valet attendants and would be able get vehicles in and out much faster. That said, I would advise against the use of Valet Attendants at any facility at this location because of operational issues, costs, and the fact that many people going to the beach would not want to use a parking lot with valet attendants.
- •This is a known high crime location. The parking attendant at Lot #731 was reportedly robbed and stabbed with a knife just recently. At Lot #731, visitors are within the line of sight of the security guard and other people. It is also possible for the security guard to see and be seen throughout most of the parking lot from a single location. Many people would avoid the new parking garage out of fear that they could become crime victims while they were isolated in the stairwells and/or elevators in the proposed garage.
- •The two boat access spaces shown on the garage plan are not functionally adequate as the pedestrian pathway shown on the plan requires passage through two double doorways to exit the facility and boaters. The fact that the same passageway appears to be the main exit and entrance for pedestrians would also be a significant obstacle. Most importantly, many people who could use the existing boat launch would not be able to use this facility because they would have to carry their boats about 50 feet from the parking garage instead of driving their vehicles onto the boat ramp. This is too great a distance for a significant percentage of the population, including the elderly, people with back and mobility problems and the handicapped.
- •Several fully automated parking garages have failed because they were not able to handle the volume of incoming and outgoing vehicles. (See article Road to Robotic Parking Is Littered with Faulty Projects, New York Times, November 27, 2015.) Car Stackers are much slower for parking and retrieving vehicles and more labor intensive than other types of parking garages, including automated and self-parking garages. The proposed garage has the potential to be a failed project in terms of operational issues and financial performance. This would be a disaster for coastal access in Venice.
- •According to page 4 of the Parking Management Plan, visitors would have to select premium, value, economy, or ADA Parking at the entrance. This system would eliminate equal access to this public facility in violation of the Coastal Commission's Environmental Justice Policy, providing wealthy visitors with a much safer and more convenient location to unload their vehicles and allowing them to avoid the long waits on arrival and departure. This system would also further impair the operation of the garage because it is very confusing and people would spend too much time talking about and deciding which option to select, which would further reduce the flow of incoming vehicles into the garage.
- •Assuming that it was properly managed, Lot #731 would be able to offer visitors an excellent experience in all respects for beach access. For the reasons discussed, the customer experience at the new parking structure would be unsatisfactory to the extent that people would not want to return, presenting a significant deterrent to coastal access.
- •The Parking Management Plan fails to contain most of the essential information about how the applicant expects the garage to function and operate. To give the Coastal Commission the information needed to better assess the operational capabilities and limitations of the design, the applicant needs to explain where visitors would drop off and pick up their vehicles, where the four attendants would be stationed, step by step instructions for the attendants about what they would do when processing

vehicles arriving and leaving, how the garage would handle the traffic for special events and emergencies where up to 252 vehicles could be arriving and/or leaving a the same time, how employee breaks would be covered without effecting customer service, where people will wait for their vehicles when it is very busy and/or the attendants get backed up, what the attendants would do if there were too many people waiting for their vehicles, the procedures for shutting down the entrance when the attendants are too busy and how the operators would determine how many attendants to schedule for a given day.

- •The applicant needs to provide detailed information showing how they calculated the number of vehicle movements per hour, including the time allocated to each step in the process and how they allowed for delays caused by vehicles driven by visitors and attendants blocking the traffic lanes along with visitors. Their plan must include details about all inbound and outbound vehicle movements to provide an accurate operating scheme.
- The design also fails to provide for any method for visitors to elect to use the charging stations or for any method to rotate vehicles in and out of the stations when they are finished charging.

Issues related to the financial viability of the proposed garage.

The proposed parking garage is likely to have significant unanticipated negative cash flow that would be passed on to beach visitors in an amount that would severely limit beach access in violation of the Coastal Act.

- •The average revenue per space for all of the beach parking lots managed by the County of Los Angeles is about \$1800 per year and the highest revenue for any of the County's beach parking lots is around \$5000 per year. (Exhibit 9: County Beach Lots Revenue vs Median Lots) The developers claim that the proposed garage will generate \$11,158 in annual revenue per space, twice as much as any conventional county parking lot on the beach. Assuming that the prices being charged for beach parking were comparable, I would expect a parking garage (1) a block and half from the beach (2) using car stackers and (3) hidden behind a housing development in a "Texas Donut" style building to generate less revenue than the conventional beach parking lot on the beach with the highest revenue, not twice as much. Parking lots farther from the beach usually charge a lower rate to attract visitors, which would further reduce revenue.
- •With \$5000.00 in annual revenue per space, the parking garage would lose over a million dollars per year, which would have to be passed on to beach visitors just to break even. (Exhibit 4 Investment Summary East Garage) The proposed parking garage would not be able to provide affordable parking for beach access if this happened.
- •The Investment Summary for the new parking garage projects that the annual number of tickets per parking space will more than double compared to Lot #731. (Exhibit 4: Investment Summary and Exhibit 5: Tierra West Parking Study at page 31.) Because the entrance at the proposed parking garage would be about 500 feet further from the beach, the garage will be hidden from the street behind the mixed-use development in a Texas Wrap type design, the customer experience as described in this report will be much worse than at Lot #731 and the entrance will not be able to handle peak surge demand, the annual number of tickets per space may drop and is very unlikely to double as projected by the developers.

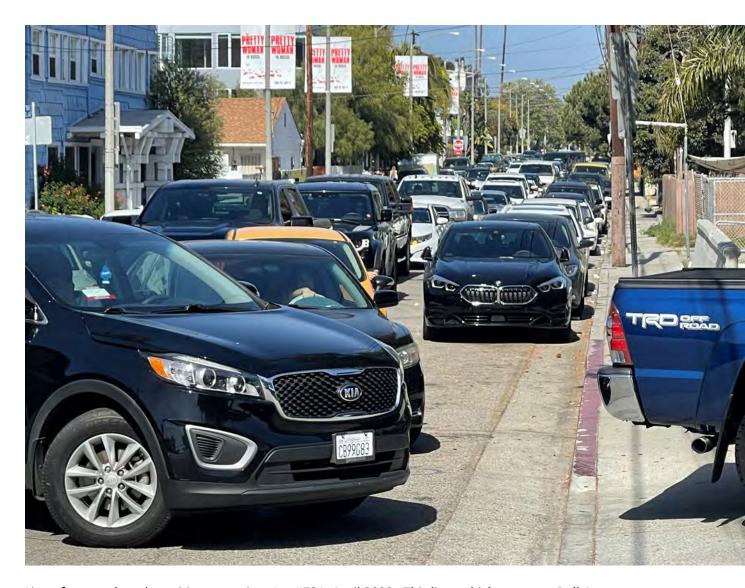
- •The existing beach parking lot fills to capacity on weekends during July, August, and September averaging about two full turns. (Exhibit 6: Email Lot #731 Fills Up 2-2-18 and Exhibit 7: Summer 2017 Daily Revenue) The developers have not provided any plausible explanation as to how the proposed beach parking garage could possibly average two full turns per space 365 days per year when the existing lot averages the same number of turns when it fills up on peak season summer weekend days.
- If the annual number of visitor tickets per space at the proposed parking garage is the same as at Lot #731, the garage would have half of the projected cash flow and a very large amount of negative cash flow. The negative cash flow would be even greater if the proposed garage failed to match the existing customer counts per space.
- •The parking lot on the beach charges \$7.00 for all day parking on weekdays and \$9.00 on weekends during the winter season and charges \$18.00 for parking in the weekends during the summer. The Parking Management Plan fails to explain how they can maintain even one turn a day, 365 days a year with an \$18.40 average ticket competing with these prices.
- •The PDG Parking Partner Proposal includes plans for real time dynamic pricing where the price would constantly change based upon supply and demand to increase profits. (Exhibit 8 PDG Parking Proposal) Dynamic real time pricing would reduce coastal access for low income and disadvantaged groups in violation of the Coastal Act. The Parking Management Plan talks about fixed hourly rates, not dynamic pricing. The Parking Management Plan needs to be revised to include detailed information about how and when prices would change and how they would achieve the projected \$18.40 average ticket with those prices.
- •The annual gross revenue at the existing parking lot is about \$1,020,821.60 (Exhibit 5: Tierra West Parking Study, at page 31). The projected annual operating expense and debt service for the new parking garage are \$2,297,889.
- •The developers have failed to reconcile their claims that there is no unmet demand for parking in this location with their claim that the demand will more than double. (See Exhibit 5: Tierra West Study regarding demand at this location.)
- Negative cash flow at the proposed garage would be passed on to the public in the form of higher prices for beach parking, on top of the high hourly rates currently planned. These additional charges would be passed on to the public in the form of higher fees over and above the high hourly rates included in the Parking Management plans which would significantly increase the number of people financially excluded from the garage in violation of the Coastal Act.
- •The Coastal Commission will have to determine whether or not the proposed garage would be financially viable and sustainable to provide affordable beach parking in the near term and for the 99-year term of the ground lease on this publicly owned property. The developers would need to provide detailed information to prove that the proposed parking garage will in fact generate more than twice as much revenue compared to any of the conventional parking lots on the beach to show that their financial projections are viable and sustainable. The information provided by the developers should include detailed calculations and supporting documents showing how their projections for the amount of the average ticket and customers counts were derived.

Conclusion

For the reasons discussed above, I would strongly advise the Coastal Commission to reject the proposed design and Parking Management Plan for the replacement parking garage. The design is not capable of servicing the volume of incoming and outgoing vehicles in this location, unsafe, and the visitor experience would be very unsatisfactory.

The existing parking lot is superior to the proposed parking garage in almost every respect.

I plan to supplement this report when information is provided with additional details about how the garage is intended to operate.



Line of cars and trucks waiting to get into Lot #731. April 2022. This line, which runs past Dell Ave, would be eliminated with changes to the entrance at Lot #731. The lines of vehicles waiting to get into the new parking structure could be much longer than the line shown in this picture. Instead of waiting in these long lines, cars drive off in search of other places to park.

Venice Beach Parking Study

Report on the irreparable harm that the "Reese Davidson" Development would do to Coastal Access and Resources

Including

Photographic Essay documenting the shortage of beach parking and acts to prevent coastal access in Violation of the California Coastal Act



Visitors were turned away from the parking lot at Venice beach on at Least 14 out 15 Weekends during the Summer of 2021 and on other weekends throughout the year.

Introduction

Instead of maximizing and expanding coastal access as required by the Coastal Act, the "Reese Davidson" development would restrict, block, minimize and eliminate beach and coastal access for drivers, bicyclists, pedestrians and recreational boaters trying to get to and use Venice beach and canals for the 99-year term of the ground lease.

The development would demolish multiple low-cost visitor serving recreational facilities on the property in violation of the coastal act:

- 1) The bikeway and path through the parking lot that bike riders use to get to the beach would both be demolished and not be replaced, eliminating the only safe paths for bike riders to get to the beach on Venice Blvd.
- 2) The drive path to the only public boat launch ramp in the canals would be demolished and not replaced, eliminating the only way for the public to get to the public boat launch ramp with vehicles and trailers to launch recreational boats in the canal.
- 3) Parking for 7 vehicles directly adjacent to the boat launch ramp would be demolished, to be replaced with impractical parking located too far away for visitors to carry a boat.
- 4) The existing self-parking lot that has a very low cost of operation would be demolished and replaced with a valet/car stacker garage with operating costs and debt service so high that it may not be financially sustainable, prices so high that it would exclude 50% of the City's residents, less parking for coastal access, a design that does not have the ability to handle the volume of incoming and outgoing vehicles and a dangerous and unpleasant customer experience that would be so bad that visitors would not want to return..
- 5) About 2.4 acres of tree lined protected Open Space that is used for parking and low-cost recreational activities would be demolished and converted into a mixed-use commercial and housing development.

There are long standing plans to expand the beach parking supply at Venice beach by building parking structures at Lot #731, which would provide a lot more than 252 parking spaces. (See Exhibit 1.3 Venice Local Coastal Program Land use Plan at page 81) There is also a trust fund for the expansion of parking. Because most of the lots near the beach in Venice are so small, Lot #731 is the only location that can be used to expand beach parking now and forever in the future.

In order to show that the additional parking structures on the Lot #731 property would not be needed, the developer gave the Coastal Commission Staff the Tierra West Parking Study prepared for LADOT to justify this development. The study concluded that there was no unmet demand for parking at Venice Beach during the peak summer months and that there will be no significant growth in demand for parking over the next 20 years.

This study shows that large numbers of visitors are being turned away from the City's parking lots in Venice on weekends all summer long in spite of the high prices that the City is charging to suppress demand and that the results of the Tierra West Study were falsified. The preservation of Lot #731 is essential to insure continued beach access at the main beach for California's largest City, and even more important to preserve equitable affordable access for low-income residents and disadvantaged groups.

The development would minimize coastal access in Violation of the Coastal Act. It would:

- A. Permanently cap the number of parking spaces available at Venice beach at a level that is insufficient to meet existing demand, making it impossible to implement long standing plans to build new parking structures with a much greater capacity on the entire Lot #731 property to meet increasing demand as needed using an existing trust fund and other funds as needed.
- B. Demolish the existing bikeway that Caltrans built on the property and block the path over the Short Line Bridge that bike riders also use to get to the beach, eliminating the only possible options to provide safe access for bicyclists to and from the beach on Venice Blvd.
- C. Raise and permanently lock in pricing for beach parking that would exclude more than 50% of the City's residents.
- D. Demolish the drive path to the only public boat launch ramp in the canals, eliminating the only way for the public to get to the ramp to launch boats with vehicles and trailers into the canal.
- E. Eliminate parking for 7 vehicles directly adjacent to the boat launch ramp, with the new parking located too far away for visitors to carry a boat.
- F. Violate the ADA by eliminating the Vehicular Access.
- G. Eliminate all of the parking available at Lot #731 for boat trailers using the public boat launch, with the possible exception of one space, effectively eliminating the use of boat trailers that were intended to be one of the primary methods of public access for recreational boaters in the canals.
- H. Pass on the cost of construction and debt service for the replacement parking garage, along with increased operating costs, from the private developers to beach and coastal visitors.
- I. Significantly reduce the amount of parking available for coastal access because the capacity for incoming vehicles at the parking garage would be too low to service them during peak hours and a significant portion of the input capacity and parking would be diverted for onsite use at the mixed-use development.
- J. Turn a very low-cost visitor coastal visitor beach parking facility into a shockingly high-cost facility with operational cost and debt service as high as \$32.50 per visitor or more compared to about \$2.50 at the existing facility.

- K. Move the beach parking approximately 500 feet further away from the beach compared to the existing lot with the handicapped parking moved from a location on the property closest to the beach to a new location at the farthest possible location from the beach eliminating access for many visitors who are elderly or have mobility issues, including the handicapped,
- L. Pack about 4000+ pedestrian trips a day in peak season onto a narrow 5-foot-wide minimum width sidewalk where visitors would have to walk single file for about 1300 feet carrying all of their beach gear instead of walking side by side with their spouses, children and friends.
- M. Change from self-parking to valet parking which would cause many people to avoid the parking garage, especially low-income and disadvantaged groups who cannot afford to tip the attendants.
- N. Make a 99-year commitment to limit the use of this property to automobile parking using car stacking technology that is already obsolete, knowing that it will be needed for coastal access involving new transportation systems in a relatively short period of time.
- O. Demolish a very-low-cost parking lot and replace it one that will have so much negative cash flow that it is not financially viable or sustainable.
- P. Replace the existing parking lot with a garage explicitly designed for the "segregation of user groups" so that wealthy users can opt out of the dangerous, painfully slow and substandard, unload your family in the traffic lane valet/car stacker option offered to other visitors who cannot afford to pay 3.75 times the standard price for self-parking space.
- Q. Move the handicap spaces from the location closest to the beach to location farthest from the beach on the far east wall of the parking garage.
- R. Block one of the handicap spaces with two other vehicles.
- S. Use dynamic real-time pricing to increase revenue at the proposed beach parking garage to maximize the amount that visitors pay, excluding low-income visitors who cannot pay the higher prices.
- T. Eliminate tree lined Open Space used for recreation and parking to build a mixed-use development with commercial businesses and housing.
- U. Generate unnecessary traffic and energy use with vehicles spending extended periods in the street waiting to get into the garage and other vehicles leaving to search for other parking because the line is too long and/or the amount being charged is too high.

This report also documents actions taken by the City of Los Angeles to block and discourage coastal access in Venice in violation of the Coastal Act. The developers' arguments in support of the Reese Davidson development relating to coastal access and community benefits are rely upon the City's illegal acts to block and discourage coastal access. These acts include:

- 1. Manipulating pricing for beach parking to discourage access, charging prices that exclude more than half of the City's population. (Up to \$45.00 vs \$12.00 in Santa Monica)
- 2. Keeping LADOT beach parking Lot #701 closed to the public for most of the year in violation of the City's Coastal Permit, including days when the neighborhood is flooded with cars looking for beach parking.
- 3. Sabotaging the entrance to LADOT beach parking lot #731 to limit the numbers of inbound vehicles to prevent people from parking in them.
- 4. Keeping the public boat launching facility locked to the public in violation of the City's Coastal Permit, creating a situation where only wealthy residents living in the Canals can use them for recreational boating.
- 5. Keeping signs posted on Venice Blvd that direct cars driving to the beach to drive away from the beach.

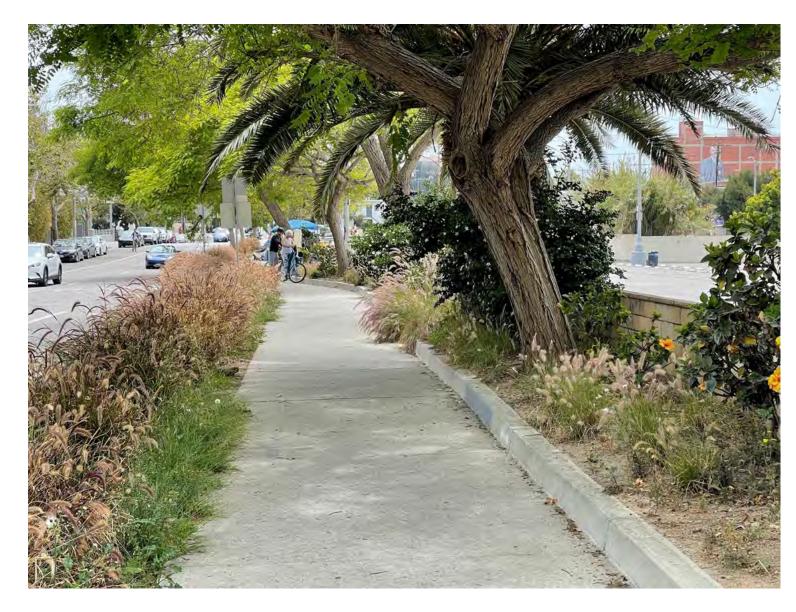
In preparing the study, I visited the Venice beach parking lots every weekend from May 30 to September 11, 2021, taking pictures and videos to make a record of what I saw. I also visited the parking lots on most weekends from shortly before the summer of 2021 continuing to the present.

The City has repeatedly failed to provide information about the Reese Davidson development in response to requests by me and other pursuant to the California Public Records Act. I have reviewed all of the documents I could obtain relating to the Reese Davidson development and the history of the Median and beach parking in Venice to prepare this report.

I expect to revise this study based upon the feedback I receive and as more information becomes available. Additional information, comments and corrections from all are encouraged. Decision makers are encouraged to contact me regarding questions and for access to additional photos and videos documenting information provided in this report along with supporting documents.

Jeffrey Kavin

1. Under the Coastal Act, the developers cannot remove the existing bikeway at Lot #731 and block the path through the parking lot also used by bike riders without including an improved bike path on the property to maximize coastal access and protect low-cost visitor facilities.



This is the existing purpose-built Bikeway that runs the length of Lot #731 to the south of the parking lot, separated for safety from the street by the curb and parkway. It is much safer than any possible option for a bike lane on Venice Blvd.

The "BIKEWAY" on the property is shown on the plans included as Exhibit 2 to the Staff report for the permit application for the existing parking lot at the proposed site of the Reese Davidson Development. (Exhibit 1: Staff Report Lot #731) Multiple Staff reports for the coastal development permits for LADOT Lot #701 also show plans for a similar "BIKEWAY" built on that property that feeds into the Bikeway on Lot #731, including Exhibits 3a and 3b to the staff report included as Exhibit 2 with this report. (Exhibit 2: Permit Application Lot #701, at exhibits 3a and 3b)

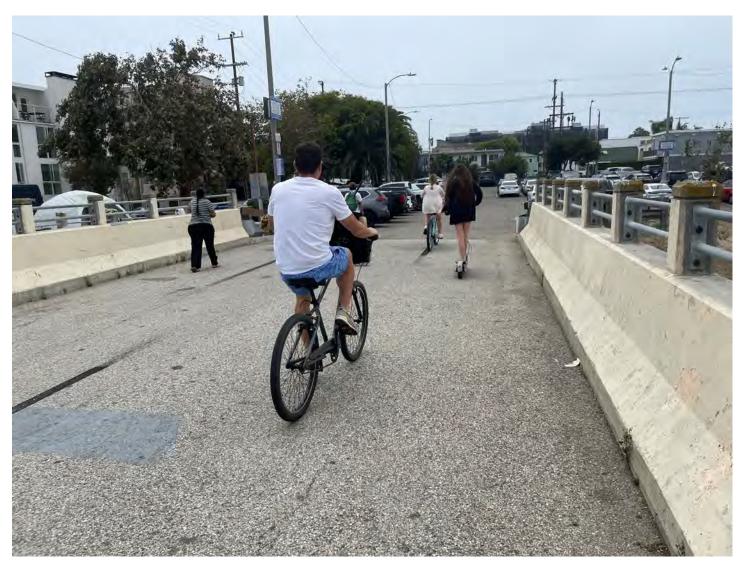
I have used this Bikeway to get to the beach many times since 2013. Many people, including me, also ride their bikes through the median parking lots using the Short Line Bridge to get over the Canal to get to Venice Beach so that they do not have to ride on Venice Blvd. Any development at this location that did not include a replacement bikeway on the property to provide safe access to the beach for bike riders would be an obvious violation of Sections 30210 and 30213 of the California Coastal Act.

Most of my bike riding is done on the bike path on the beach. I use the Median Parking lots to get to the beach when I ride my bike. I would not use a bike lane on Venice Blvd because it is too dangerous. I have read that I would have about a 90% chance of being killed if hit by a car going 45 mph on a street like Venice Blvd. The Reese Davidson Development would block my bicycle access to the beach in violation of the Coastal Act.

There is also a bike lane on North Venice Blvd that shares a lane with cars and a bike lane on South Venice Blvd that runs along a line of parked cars that can open doors pushing bikes into traffic. Any possible improvements in the bike lanes in the street along Lot #731 would be much less safe than the existing bikeway on the Median.

Venice Beach reportedly gets around 10 million visitors per year. This Beach location sees a lot of heavy vehicle and bicycle traffic, especially on weekends with good beach weather. Many drivers and bicyclists from other states and countries get very confused. Cars try to drive against traffic on the one-way lanes on Venice Blvd all day long, further adding to the risk to bicyclists. The high percentage of drivers in this beach tourist location that have been drinking and smoking marijuana makes this busy beach location even more dangerous. One parking lot attendant at the beach told me that "everybody" driving at the beach had been drinking. I see incidents of reckless driving pretty much every time that I am in the area.

In 2019 alone, there were 42 bicycle deaths and 3408 bicycle collisions in Los Angeles County. There were at least 2 bicyclists killed by cars near Lot #731. (At Venice Blvd & Grand Blvd and at Pacific Ave & Rose Ave) In 2020, actor Orson Bean was killed while crossing Venice Blvd about ½ mile from Lot #731. On January 24, 2022, there was another fatal pedestrian accident on Venice Blvd less than a mile from Lot #731. On March 13, 2022, another pedestrian was killed next to the intersection of Venice Blvd and Lincoln. There have also been 2 separate fatal accidents a few blocks away on Washington Blvd at Ocean Ave. Bicycling.com has called Los Angeles the worst bike city in America and Venice is one of the worst neighborhoods in Los Angeles for accidents.



This picture shows bike riders, pedestrians and a scooter rider heading towards the beach over the Historical Short Line Bridge at Lot #731. The Reese Davidson development would block the path through Lot #731 over this bridge used by bike riders, scooter riders and pedestrians. To comply with the Section 30210 of the Coastal Act, any new development at Lot #731 would have to be an improvement over the existing coastal access for bicyclists, pedestrians and people riding scooters.

2. The Coastal Development Permit Application for the Reese Davidson development relies upon the illegal practice of keeping the public locked out from the public boat launch and boat launch parking lot in violation of the existing coastal development permit.



This picture shows the low-cost recreational boating facility built as a condition for a Coastal Development Permit allowing private boat docks in the canals.

Pursuant to the permit, this lot is a coastal recreational facility to be used by the public for vehicular and and trailer access to the public boat launch ramp for recreational boating and parking for people using boats. The City keeps it locked to the public even though the Coastal Development Permit requires it to be open between the hours of 8 a.m. and sunset on all days. (Exhibit 3: Public Boat Launching Ramp CC 3-21-03 Staff Report at page 22)

Instead of expanding the boat launch facilities to maximize coastal access, the Reese Davidson development would be built on the site of the boat launch access and parking lot. eliminating direct vehicular access to the boat launch ramp for recreational boaters using vehicles and trailers to get their boats into the water using the ramp.

Pursuant to application #5-92-377 -A 1, the Coastal Development permit for the public boat launch requires:

"Prior to issuance of the permit amendment, and within sixty days of Commission action on the amendment, the City shall submit, for the review and approval of the Executive Director, a City plan for the operation of the public boat launching ramp and parking lot located at the northern end of the Grand Canal. The plan shall include signage and the specific terms for public access and use of the facility. At a minimum, the facility shall be open for public boating and vehicular access (for transportation of boats to and from launch ramp) between the hours of 8 a.m. and sunset on all days. The City shall implement the plan as approved by the Executive Director. "(Emphasis changed) (Exhibit 4: Exhibit 4 Public Boat Launch CC Staff Report 5-24-01 at page 4)

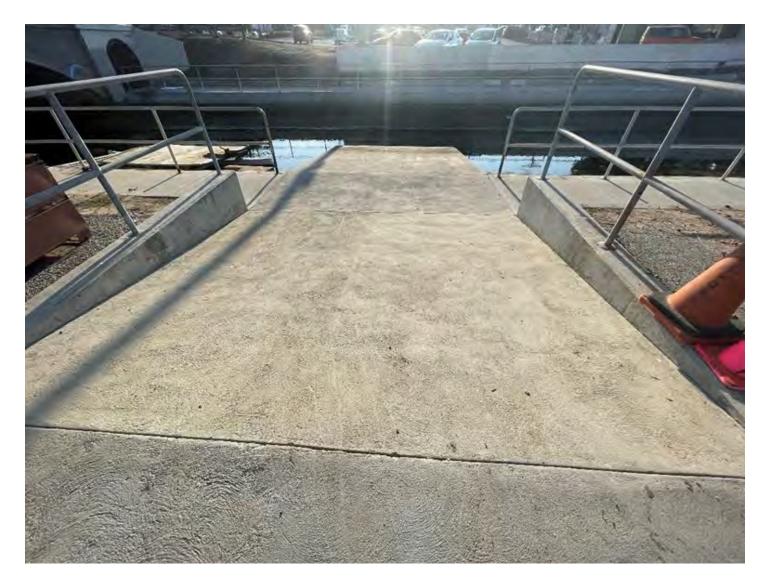
The permit also provides: As conditioned, the dock plan will not restrict the public from using the Venice Canals for recreational boating and public boating access in the Venice Canals will be protected as required by the Coastal Act. The public will continue to be able to access the canals with nonmotorized boats at the public boat launching ramp approved under Coastal Development Permit 5-91-584 (City of Los Angeles). The public boat launching ramp is located on the northern end of the Grand Canal (Exhibit #1). A seven-space parking area at the public boat ramp provides parking for people using boats while visiting the Venice Canals. Public access along the public walkways adjacent to the Venice Canals must also be protected. In order to ensure that construction and use of the proposed docks does not inhibit "(Ibid, Page 9, Also see Document: Exhibit 8 from Development Application 5-91-584 which shows the layout of the parking spaces.)

Thus, the City is required to keep the gate to the public boat launch and boat launch parking area unlocked during the day to provide vehicular access to the boat launch, to have a sign posted to let the public know that the ramp is available for recreational boating in the canals and to provide a dedicated parking area at the boat launch with 7 spaces. The City is in violation of all of these requirements because the gate is kept locked and there is no sign.

The plans for the public boat launch at the Reese Davidson development and the justification for those plans submitted with the development application are based upon the illegal practice of keeping the access and parking area for the boat launch locked to the public in violation of the Coastal Development Permits to make it impossible to use it for launching boats from vehicles and trailers as intended. The document "Boat Launch Diagrams & Descriptions" submitted with the development application discusses the fact that the gate to the boat launch is kept locked, relying on that fact to justify their claim that they are improving access.

This attempt to justify the elimination of coastal access in the form of direct vehicular access for vehicles and trailers to the public boat launch ramp relies upon the fact that the City has already eliminated that access illegally in violation of their coastal development permit. The developer is using the similar tactics with the bikeway and the tunnels under both sides of the Short Line Bridge that connects South Venice Blvd and the Canal. The elimination of access and attempt to rely upon the illegal elimination of that access to remove it permanently or to claim that the unlocking of that access is an expansion of access must be discouraged and prevented because it sets an unacceptable precedent.

3. Instead of expanding it to maximize access as required by the coastal act, the Reese Davidson Development would demolish almost all of the public boat launch facility that was built for low-cost recreational boating.



The boat launch shown above was built to allow visitors to drive their cars, trucks and trailers directly onto it to provide access for Recreational Boating into the Historical Canals.

The Reese Davidson project would eliminate direct vehicular access for the public at the only public boat launch for recreational boating in the canals. This would be in direct conflict with Section 30224 of the coastal act which specifically provides for increasing public launch facilities. It would be impossible for many people to carry a boat this distance. This would also exclude people with disabilities, mobility issues, health issues and the elderly who cannot carry a boat 50-90 feet. The exclusion of these groups from boating activities would be in violation of the Coastal Act and the ADA.

The elimination of vehicular access would also be a violation of the ADA. "Individuals with disabilities cannot be excluded from or denied participation in State and local government programs, services, or activities because a facility is inaccessible or

unusable. This means that all programs, services, and activities, when viewed in their entirety, must be accessible to individuals with disabilities unless doing so results in a fundamental alteration in the nature of the program or in an undue financial and administrative burden." See https://www.ada.gov/ada_title_III.htm

The City allows the use of non-motorized boats up to 16 feet long and 6 feet wide in the canals, as long as the total length plus width is less than 21 feet. (Exhibit 3: At page 8) Many permitted boats would weigh over 120 lbs. In many cases, it would be impossible to use these larger boats, including pedal boats, at the Reese Davidson development.

Although I am healthy and physically active for my age, I would need to be able to drive onto the boat launch ramp to be able unload a boat with another person helping me. Even with a light boat, I would not be able to carry it with another person helping me from the proposed parking garage to go boating in the canals.

The Permit Application includes plans to provide "access" to the boat launching ramp from a loading zone on North Venice Blvd 90 feet away. The path between the loading zone and the boat launching ramp is too narrow for carrying boat a 16x6 foot or one smaller. Pedestrian walking the other way would also block the path. People carry a boat from the east parking garage would have a similar problem with foot traffic going the other way.

The Reese Davidson development would also block vehicular access to the canals for maintenance and construction crews who use the existing driveway, parking, work and loading areas to get their oversized commercial vehicles, boats, barges and supplies into and out of the canals. The workers also use this access to remove tons of debris out of the canals. There is no comparable access point in the entire canal system for these maintenance and construction workers. Maintenance issues have been an almost insurmountable problem and threat to the continued existence of the canals from the very beginning.

4. The Reese Davidson development would eliminate all of the parking at Lot #731 that is supposed to be used for boat trailers.

The 5/25/94 Staff report for Coastal Development Application 5-94-081, makes very clear that Lot #731 is supposed to be available for boat trailers using the Public Boat Launch: "The parking lot is also used for the parking of vehicles and boat trailers by person using the Venice Canals public boat launch ramp which is located directly adjacent to the site." (Exhibit 1, page 4)

Lot #731 is large enough to accommodate a large number of boat trailers, especially on weekdays.

Limiting the use of the public boat launch to one trailer at a time at the Reese Davidson development is not a viable option because it significantly reduce the number of people using the bock launch ramp in Violation of the Coastal Act:

- a. Only the first trailer to arrive would be provided with parking.
- b. Older people and those with disabilities are not strong enough to lift a boat onto a roof rack.
 - c. Many vehicles cannot be used with a roof rack.
 - d. Trailers are probably the most popular way to transport boats on public roads.
 - e. Some boats can only be transported on trailers.
 - f. Trailers can carry more boats and bikes at one time than other methods.

The City has kept this public boating facility locked to the public for many years. Most people believe that only residents can use boats in the canals. That was my understanding for almost a decade of walking through the canals and Lot #731. One of the employees at Lot #731 told me that he had only seen about 3 people boating in the canals in about six months of employment.

It is impossible to determine how much parking will be needed for the public boat launch because the public has been kept locked out for many years in violation of the City's Coastal Permit. With 10 million residents in Los Angeles County and millions of tourists from other places every year, promotions informing the public about the opportunities for recreational boating in the canals should lead to a big increase in use over a period of years. It is entirely possible that there is enough demand to fill most of Lot #731 with vehicles and trailers owned by visitors using the boat launch when people find out that this access is availble. Moving forward with the Reese Davidson development without allowing time to determine the demand for parking for the public boat launch would be in conflict with the Sections 30120, 30223 and 30224 of the Coastal Act.

5. The substandard five-foot wide minimum sidewalks that the City approved for this development will minimize pedestrian access to the beach and canals in this busy location for at least the 99-year term of the ground lease.



Families that park in Lot #701 walk to the beach side by side through Lot #731. The Reese Davidson development would jam all of the people using both parking lots onto a minimum 5-foot-wide sidewalk for about 1400 feet with heavy foot traffic in the other direction on summer weekend days. Note that most of the people in this picture are carrying or wheeling something and that the carts being wheeled would block the path of people going in the opposite direction.

People going to the beach with their spouses, children, relatives and friends walks side by side in twosomes and threesomes, socializing at they go. Couples hold hands. while parents hang on to their children. This will not be possible at the Reese Davidson development, where they will be forced to walk single file trying not to bump into the heavy foot traffic going in the other direction, with bulky beach gear being carried by the people going in both directions.

Almost all of the people parking in Lot #731 and many of the people parking in Lot #701 walk through lot #731 to get to the beach instead of using the sidewalk on Venice Blvd.

All of these people will be forced to use the substandard sidewalks planned for the Reese Davidson development. In other words, this development would be directing a huge volume of new traffic onto the narrow sidewalk at the same time that it would be reducing the width. This is not maximizing coastal access.

The two parking lots in the Median often get over 600 vehicles a day during the summer on weekends. (Exhibit 5: 2017 Daily Revenue) Assuming an average of 3 persons per vehicle, which is probably too low, the sidewalks on North and South Venice Blvd would have more than 1800 people using the sidewalk to get to and from the beach. That would be 3600 trips per day just from the median parking lots, mostly concentrated in a few hours in the afternoon. Other people using the sidewalk would add to that number.

When I was growing up, we would walk from Ocean Ave to the end of the Santa Monica Pier with almost no one around us. Today, the Ocean Ave crosswalk and the pier are a huge mass of people. The parking garage and sidewalks at the Reese Davidson development are undersized for today's needs. The coastal access problems would get much worse over time if this 99-year development is built.

6. The winter rate for parking in LADOT Beach parking Lot #731 in the Venice Median is more than 2 times as much as lots on the beach and more than low-income residents would be able to pay. These prices exclude more than 50% of the people living in Los Angeles from their own City's beach parking lots.



Above: \$20.00 Winter rate in City Owned Median Beach Parking Lot #731 one block from Venice Beach. (Proposed Site of Reese Davidson Development)





Two pictures above show prices at City and Private lots at Venice Beach on the same day that City was charging \$20.00 at Lot #731. Anyone parking in the Venice Median will walk by these signs at the beach telling them that they had paid more than twice as much as they should have. Any market or equitable rate in compliance with the Coastal Act would be much less than the price of the parking lots at the beach, instead of twice as much.

7. The Weekend Summer Rate for Beach Parking in the Venice Median more than two to and up to twelve times as much as the price in Santa Monica.





The price to park a block from the beach in the Venice Median Lot #731 was \$25.00 throughout the summer of 2021, more than twice as much as the \$12.00 charge to park at the beach in Santa Monica.

It would cost \$25.00 to park for 2 hours in the Venice Median Lot #731 compared to \$2.00 in the short term beach parking lots in Santa Monica.

Prior to Covid, Lot #731 was charging up to \$45.00. (Exhibit 7: Exhibit 7 Tierra West LADOT Parking Study at Page 30) The \$45.00 rate is 3.75 times the maximum rate in Santa Monica. On most days during the summer of 2021, the price to park in the City Owned parking lot on the Venice Median was the highest posted price for beach parking in Venice.

Santa Monica sells monthly beach passes for \$27.00 a month, with a 12 month Senior pass that costs only \$25.00 for the year. (Exhibit 6) The City of Los Angeles does not sell beach passes and the County program excludes weekend parking in Venice.



Above: \$20.00 charge for parking in Venice Median Lot #701 two blocks from the beach. Lot #701 was charging up to \$45.00 for parking before Covid. (Exhibit: Tierra West Parking Study Page 30) Parking further away from the beach should be less expensive, not more.

In a 2016 Statewide survey of California Voters by UCLA, limited affordable options for beach parking were seen as a problem by 78% of Voters. Half the people surveyed said that they would not pay more than \$8.75 for beach parking and "very few, if any, are willing to pay more than \$15 per day" for parking. (Exhibit 8: Beach Survey Assess for All at page 5)

The study also concluded: While we should be cautious and avoid relying too much on any single number in these analyses, our findings clearly show that for the majority of visitors, a trip to the California coast is a close call in terms of cost. These numbers help illuminate why so many of the people we surveyed in our statewide poll and on beaches are concerned about the cost of visiting the coast. Our research strongly indicates that the principal factors affecting the cost of visiting the coast are distance from the coast, and thus the cost of getting to the coast, and the cost of overnight accommodations and parking. Individual factors, such as income, age, and whether a family is traveling with children are important, too, in shaping whether and how often Californians visit the coast." (Exhibit 8 at page 6.)

According to a study by the Cato Institute, the poverty rate in Los Angeles is 26.1%, higher than any other region in the State. A survey in poor neighborhoods in Los Angeles would be almost certain to produce much lower numbers for the maximum price that people would pay for beach parking.

Only 4% of the people in the UCLA survey of California Voters used public transportation to get to the beach. The bus ride to get to Venice beach is more than two hours each way from many low-income communities in the City of Los Angeles and more than 3 hours each way from the Inland Empire. Affordable beach parking is an essential element for equitable beach access.

As detailed below, the average cost per ticket will be much higher again at the public parking garage at the Reese Davidson Development. These pricing policies violate Sections 30001.5 and 30213 of the California Coastal Act under which the City is required to maximize coastal access and provide low costs visitor facilities.

8. After adjusting for inflation, parking at the publicly owned beach parking lots in Venice currently costs 5 times as much as it did when the Coastal Act was passed in 1976.

All day parking cost 50 cents on Weekends and Holidays at Venice Beach in 1952, which would be \$5.16 today after adjusting for inflation. (Los Angeles Times May 25, 1952, page 56) When the Coastal Act was passed in 1976, it cost \$1.00, which would be about \$4.82. In 1980, it cost \$2.00 to park at Venice Beach, which would be about \$5.67 today. (Los Angeles Times July 2, 1981, page 5) Today, it costs \$25.00 to park a block from Venice beach and \$20.00 to park 2 blocks from the beach.

In the past, the price of Parking did not increase on Holidays in Venice. Today, the City charges as much as \$45.00 to park in the Median on Holidays, which is more than nine times the price in effect when the Coastal Act was passed adjusted for inflation. Santa Monica charges \$12.00 on Holidays. The County of Los Angeles does not charge extra on Holidays. The \$45.00 price excludes well over half of the City's population on Holidays.

The California Coastal Act was passed to expand coastal access for all. Any increase in the cost of parking that exceeds the rate of inflation would reduce coastal access in Violation of the Coastal Act.

9. The parking proposal for the Reese Davidson Project documents plans to increase the price of parking to a level that excludes more than half of the City's residents.

The Public Parking Management Plan submitted with the Coastal Development Permit Application reveals "preliminary hourly rates" of \$4.00 to \$15.00 per hour for parking a block and a half from the beach, not including a tip for the Valet Attendant compared to \$1.00 per hour for short term parking and \$12.00 for all day parking at the beach in Santa Monica. (Exhibit 9 Public Parking Management Plan 5.24.22, at pages 6 and 7) "All Day" (8 hours) parking at the \$15.00 rate would cost \$120.00.

The Public Parking Management Plan submitted with the development application states: "The largest tier of parking patrons, economy, is intended to be priced so that it stays generally in line with, or slightly below prevailing parking rates in the area." Exhibit 9, Page 7) The prevailing rates in the area are set by private lots that charge whatever the market will bear during peak hours. These lots currently charge up to \$45.00 or more during peak hours and their rates will skyrocket as demand increases and supply decreases.

The publicly owned beach parking lots should be used to drive the prices down at the private lots. The opposite happened during the course of this study with the City's parking lots having the highest posted rates which caused the private lots to raise their rates. The Reese Davidson development would make this problem even worse by raising the prices even more and by adding demand because the project does not have enough parking dedicated to onsite demand.

The year-round average ticket for all day parking at the existing parking is \$14.37 and the maximum rate is \$45.00. (Exhibit 7 LADOT Tierra West Parking Study, Pages 30 and 31). These exclusionary prices, which are significantly higher than other publicly owned beach parking lots, violate the Coastal Act. The Investment Summary for the Reese Davidson Public Parking Structure shows that the AVERAGE charge for parking over the course of a year would be \$18.40. (Exhibit 10 Investment Summary East Garage) This would be for hourly parking which would replace the flat all-day rates currently being charged. This \$18.40 average charge does not include a tip for the Valet attendant. Beach visitors, who are already being overcharged, would pay a lot more to get a lot less.

The cost of the tip for the attendant at the Reese Davidson Garage would be more than the charge for 2 hours of parking in Santa Monica.

To compete with Santa Monica and to comply with the Coastal Act mandate to maximize access, the rate at the public parking garage should be about \$1.00 per hour with a maximum charge of about \$8.00 during the summer and \$6.00 during the winter. Lot #731 would be very profitable charging those prices.

10. The City's current pricing and plans to increase rates much higher at the Reese Davidson development violate the provisions of the California Coastal act that mandate that coastal access be maximized and lower cost facilities be provided and protected.

Pursuant to section 30001.5 of the Coastal Act, the Coastal Commission is required to "Maximize public access to and along the coast and maximize public recreational activities..." The definition of maximize it to "make as large or great as possible." In this case, the City's current pricing and plans for significantly higher pricing at the Reese Davidson development will minimize coastal access instead of maximizing it. This is not permissible under the Coastal Act.

"Understanding that even nominal costs can be barriers to access preserving and providing for lower-cost-recreational opportunities such as parks, trails, surf spots, beach barbeque and fire pits, safe swimming beaches, fishing piers, campgrounds and associated free or low-cost parking areas. The conversion of lower-cost visitor serving facilities to high-cost facilities is also a barrier to access for those with limited income and contributes to increased coastal inequality. The commission will strive for a no-net-loss of lower-cost facilities in the coastal zone, while implementing a longer-term strategy to increase the number and variety of

new lower-cost opportunities." The conversion of lower-cost visitor-serving facilities to high-cost facilities is also a barrier to access for those with limited income, and contributes to increased coastal inequality. The Commission will strive for a no-net-loss of lower-cost facilities in the coastal zone, while implementing a longer-term strategy to increase the number and variety of new lower-cost opportunities. (Exhibit 13 California Coastal Commission Environmental Justice Policy at Page 7) (Emphasis added)

Because Los Angeles is California's largest City located in the Largest County with 25% of the State's population, beach access at Venice Beach probably impacts more people than any other location in California. The California Coastal Commission has described Venice Beach as the most intensively used recreational beach in the state. The current beach parking practices and prices, along with plans to increase prices even more at the Reese Davidson development, are indefensible under the provisions of the Coastal Act that require the commission to maximize coastal access and to provide and protect lower cost options.

11. The revenue at the proposed parking garage will probably be less than half of the amount shown in the financial projections for the development, creating a situation where huge amounts of negative cash flow would need to be passed on to beach visitors and where the garage would not be financially viable or sustainable.

The financial projections for the new parking garage are based upon revenue projections that show that the annual revenue will be \$11,158 per space. (Exhibit 10 Investment Summary East Garage) This is more than twice as much as the revenue per space at the public lot at Venice Beach which generated about \$5000.00 in annual revenue per space before covid. (Exhibit 10.1: RFP County Parking Lots w 2016 Revenue at Exhibits) and H) The only beach parking lot managed by the County that generated more revenue was the Washington Blvd lot in Venice, which also generated about \$5000 in annual revenue per space. (Ibid)

The additional revenue at all five of the Venice lots comes at least in part from charging higher prices than at other beach lots. These higher prices exclude many visitors in violation of the coastal act. Only one of the beach parking lots managed by the County that is not in Venice generates more than \$3000.00 in annual revenue per space. (Surfrider, \$3033.00) (Ibid) With \$3000.00 in annual revenue per space, the proposed garage would only have \$756,000 in gross annual revenue and would have more than 1.5 million dollars in negative cash flow every year. That would be over 148 million dollars over the 99-year term of the lease, not including inflation.

Assuming that it is not charging higher prices, a beach parking lot hidden behind a mixed-use development (Texas Donut) a block and a half from the beach should generate much less revenue per space than a parking lot actually on the beach, not more than twice as much. The operational and customer service deficiencies of the garage design as discussed in the Parking Advisory Group Analysis and this report would

also significantly reduce revenues compared to Lot #731 and the parking lot on the beach.

Even if the new garage could match the annual revenue per space numbers from the parking lot on the beach while charging prices that comply with the Coastal Act, which is extremely unlikely, it would have over one million dollars per year in negative cash flow that would be passed on to coastal visitors which would further increase the number of people financially excluded from the garage.

I made a public records request to LADOT asking them to provide the documents used to prepare the average ticket price and annual car counts, but no such documents were produced. The request asked for: Documents showing the assumptions used and calculations of the average ticket used in the proforma submitted to MICLA, including the pricing plan upon which it is based and Documents showing the assumptions used and calculations of the annual car counts used in the proforma submitted to MICLA.

Lot #731 generates about \$5000 annually per space. (Exhibit 7 Tierra West LADOT Parking Study) It was able to generate this level of revenue by charging prices that were often twice as much as the price on the beach. The new parking garage will have a much lower annual revenue per space because it will have to drastically reduce prices to comply with the Coastal Act, will have an entrance about 500 feet further from the beach, will be hidden behind the mixed-use development (Texas Donut), the customer experience will be so bad that people will not want to return and it does not have enough capacity for inbound vehicles to maximize traffic and revenues.

At 1 to 1.5 million dollars a year, the negative cash flow on the parking garage could easily exceed 100-150 million dollars during the term of the 99-year ground lease. The garage is not financially viable or sustainable, especially for the long term of the lease.

12. If the Reese Davidson development is built, beach visitors would be forced to pay excessively high parking fees to subsidize a very high-cost visitor and recreational facility that would replace a very low-cost visitor and recreational facility for the benefit of the developers of the Reese Davidson mixed use development in violation of the Coastal Act.

The annual debt service for the new parking structure as listed in the investment summary would be \$1,368,517 which would be passed on to beach visitors in the form of higher parking fees to subsidize the developers. (Exhibit 10 Investment Summary East Garage) The annual debt service would be much higher than the \$1,020, 821 gross annual revenues at the existing Lot #731. (Exhibit 7 Tierra West LADOT Parking Study) With the existing traffic counts, everyone parking in the new structure would have to pay \$19.27 just to pay for the debt service.

The annual operating expenses for the new parking structure in the amount of \$929,372,00, as shown in the investment summary, would also be passed on the beach visitors, which would add another \$13.23 to the cost of parking to break even with the existing customer counts. (Exhibit 10 Investment Summary East Garage) Adding the

\$19.27 to the \$13.23, each visitor would have to pay about \$32.50 for the new parking structure to break even with the existing customer counts.

The annual operating costs to operate the existing Lot #731 is about \$172,000 per year. (Exhibit: Exhibit 12 Revenue and Expenses Lot #731) This means that it would break even charging about \$2.50 with the existing customer counts compared to about \$32.50 at the new parking garage. Replacing a very low-cost facility with a very high-cost facility that would need to charge exclusionary prices is not permissible under Sections 30213 and 30210 of the Coastal Act.

The existing parking lot, which would be very profitable charging less than \$5.00, is the only viable option to maximize coastal access at this iconic coastal location.

Additional Information about the financial issues relating to the parking garage is included in the Garage Analysis prepared by Tom Sivak of The Parking Advisory Group. (Exhibit 1.1 Garage Analysis Parking Advisory Group and Exhibit 1.2 Tom Sivak Professional Background)

13. Any equitable system of pricing for a publicly owned beach parking lot based upon the principles of social and economic justice would set the price at the lowest level possible that does not cause the lot to exceed capacity.

In this case, the City of Los Angeles has been doing the opposite of this by systematically setting parking rates in the Median lots to levels designed to prevent people from using them for beach access. This is an obvious violation of the Section 30210 of the Coastal Act under which they are required to maximize coastal access and Section 30213 which provides that "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided."

14. The use of real time dynamic parking to get beach visitors at the proposed garage to pay higher prices violates the Coastal Act.

The Pacific Design Group Proposal for the Reese Davidson Public Garage calls for parking to be sold "like seats on a commercial airline" so that the City can "do more with less spaces" by "leveraging the best performing spaces in real-time." PDG also describes each parking space as a "individual profit center" to be managed with a "demand-driven rate structure." (Exhibit 11: PDG Parking Proposal, pages 3, 11, and 12)

The PDG proposal would use dynamic pricing to squeeze the last dollar out of beach visitors by raising prices on a minute-to-minute basis at times of increased demand: "the price of a particular tier of spaces, along with the number of spaces in the tier will fluctuate according to real-time demand in a beach parking marketplace." (Exhibit 11: PDG Parking Proposal, Page 14) This use of real time dynamic pricing at a publicly owned beach parking lot would violate the provisions of the coastal act that require equitable access for all people, not just people who can afford to pay the whatever it costs prices planned for this Public Parking Garage.

15. At a time when the number of visitors on the beach and the boardwalk were at record lows, all three of the City owned parking lots on Venice beach consistently turned people away on weekends during the 2021 Summer Beach Season.





I visited the Beach Parking lot at the end of Venice Blvd every weekend from May 30 to September 11, 2021 taking pictures showing that cars were turned away from the City's Venice Blvd beach parking lot on at least 14 out of 15 of those Weekends. (I got sick on the missing weekend.)

Cars were also turned away in September and November 2021 and in February, March, April and May of 2022. From May 30 2021 to May 8, 2022, cars were turned away from the Venice Beach lot on at least 23 weekends.

The parking lot attendants confirmed that the lot on Venice Beach was much busier before covid, filling up earlier, turning people away multiple times a day throughout the summer weekends and on winter weekends when the weather was warm.











The City's Washington Blvd and Rose Ave beach parking lots turn cars away with similar frequency, probably more than the lot on Venice Blvd. One of the attendants told me that the Rose Ave lot normally fills up before the Venice lot because it has less spaces.

16. A 2018 LADOT email and spreadsheet shows that Lot #731 filled to capacity on every weekend during the summer of 2017, from May 27 to September 30.

A February 2018 email from David Cataldo at LADOT States:

"Attached is the excellent spreadsheet Rauhman did showing revenue and ticket numbers for Lots 701/731 in the 2017 high season.

A fair assumption could be made that any day that the number of tickets at Lot 731 exceeded 250 and Lot 701 was open, that Lot 731 did fill to capacity at least for part of the day." (Exhibits: Exhibit 14 Email Lot #731 Fills Up 2-2-18 and Exhibit 5 Summer 2017 Daily Revenue)

As shown on the Daily Revenue spreadsheet, Lot #731 had more than 250 tickets on every weekend from May 27 to September 30, 2017 with Lot #701 open on all of those days. (Exhibit 5 Summer 2017 Daily Revenue) On most weekend days during this period, there were between 400 to 550 tickets for Lot #731, which more than enough to fill the 196 spaces twice. Lot #731 also had between 310 to 366 tickets on May 13, 14, 20 and 21 when Lot #701 was not open. The spreadsheet also shows that Lot #731 also had enough traffic to fill the lot on a number of weekdays.

The spreadsheet also shows strong traffic at Lot #701 with weekend customer counts averaging approximately 230 cars per day from July 8 to August 27 for the 150 space all-day beach parking lot.

The median parking lots filled up to capacity all summer long in spite of the fact that they were charging prices that excluded most beach visitors and were much higher than other lots closer to the beach. For example, the average ticket on July 23 was \$24.86. The average at #701 was \$21.29 for parking 2 blocks from the beach on the same date. (Exhibit 5 Summer 2017 Daily Revenue)

The email and the spreadsheet show that there was unmet demand all summer long even when they were charging prices that exclude half of the City's residents.

17. A May 2020 LADOT email also confirms that LADOT knew that Lot #731 fills up on weekend and hot weekdays during the summer.

A May 29, 2020 LADOT email from David Cataldo to Ken Husting states: "We cannot accommodate the request on Lot 731 as the lot fills on weekend and hot weekdays." (Exhibit 15 Email Lot #731 fills on Weekend and Hot Weekdays in the Summer)



Above: The usual line of cars waiting to get into the Venice Beach parking lot on weekend days with nice weather. All of these cars can be turned away at one time when the lot fills up, with a continuous flow of more cars following.





Top: Line for Rose Ave Beach Parking Lot. Below: Line for Venice Blvd Lot.





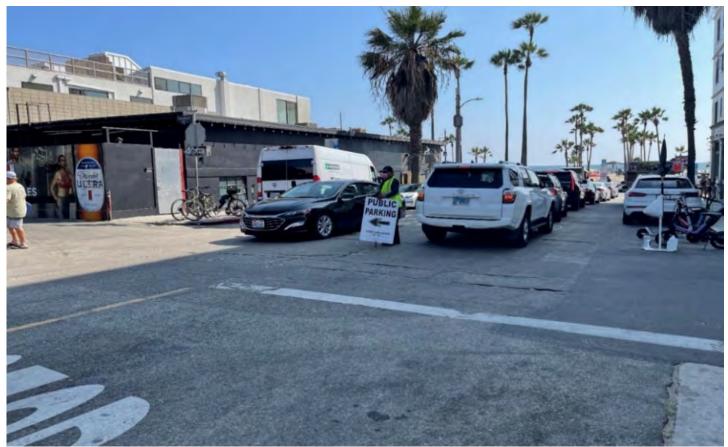
Top: Rose Ave Beach Lot Bottom. Washington Blvd Lot. The line repeatedly looked like this during the summer of 2021. According to the attendant, it was 2 blocks long before Covid.



Above: Line for Washington Blvd Lot. The line looks like this all year long on weekend days with nice weather.

According to the Venice Chamber of Commerce, 43.8% of Venice Beach Visitors come from outside of Los Angeles County and Southern California. Most of these people were not around when the cars were being turned away from the City owned parking lots on Venice Beach during the summer of 2021.

18. Visitors waiting in lines at City owned parking lots are being diverted to private lots charging even higher rates, creating another deterrent to beach access at Venice Beach for low-income residents.



Cars trying to park for \$18.00 in the City Owned Parking lot at Rose Ave are openly diverted all day long during the summer season by workers for private lots standing in the street directing traffic. This person is directing traffic to a lot that has no prices posted, but charges as much as \$40.00 a day. This practice, enabled by the City, is a significant deterrent to beach access for low-income visitors and other disadvantaged groups.



Above: The City owned Rose Ave Lot fills up even with cars being diverted continuously all day long. Below: Cars are also diverted away from the \$18.00 Venice Blvd Lot to private lots charging as much as \$45.00.

19. During the summer of 2021, the parking lots were full and turning people away while the beach and the boardwalk were empty because of covid, travel bans and a flood of news stories and social media postings telling people to stay away from Venice beach because of crime, drug use, unsanitary conditions and homeless camps.



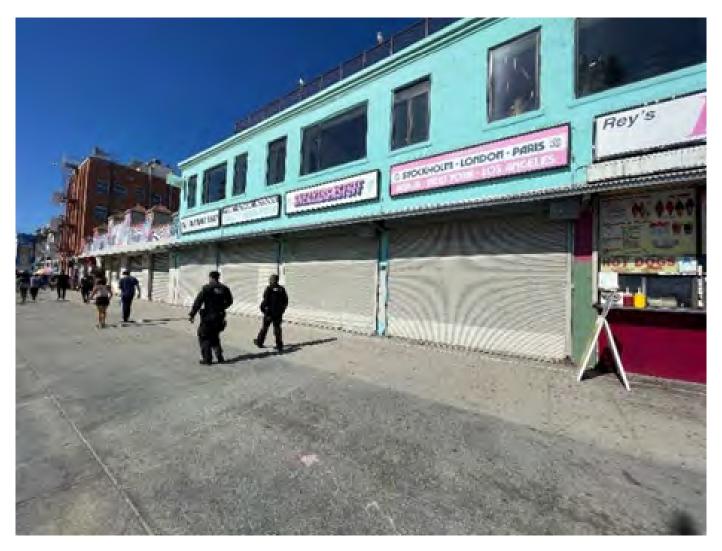
July 4th, 2021 4:15 PM-The Parking lots were turning people away, while Venice Beach was almost empty. Venice Pier in the Background.

This parking study, which found vehicles being turned away from the Venice parking lot on at least 14 out of 15 weekends during the summer of 2021, was done during a time of record low visits to the beach and boardwalk because of Covid, travel bans and international publicity telling people to stay away from Venice beach because of homeless camps and crime.

A parking attendant who works at Lot #731 and the City owned lot on the beach at Rose Ave told me that before Covid (1) both lots filled up consistently during the summer (2) Rose Ave filled up before the lot on Venice Beach (3) Venice Beach would fill up sometime midday, opening and closing thereafter (4) there was a constant line at Lot #731 sometimes running to Ocean Ave.

Online reviews, newspaper stories and other sources confirm that the parking shortage at Venice Beach was much worse before Covid.

The online reviews included as Exhibit 16 to this report includes over 10 pages of online comments complaining about the parking problems including: "Why did I spend two damn hours trying to park?", "Parking is the worst thing ever". "get there plenty early or, you'll never find parking", "Parking is horrific". "There is a huge shortage of parking at the beach and what there is costs a lot" and "parking is crappy, expensive and there's usually a wait. We've given up and gone home several times." (Exhibit 16 Online Reviews Venice Beach Parking)



The Venice Boardwalk is normally crowded with people packed in close together. This was not possible during the covid pandemic in the Summer of 2021. The picture above is from Labor Day weekend in 2021.

20. The entrance to Lot #731 has been artificially restricted so that the maximum number of cars that can get through the entrance is similar to the number leaving through the three exits throughout the afternoons on weekends during the summer season.

The entrance to Lot #731 has been artificially restricted to limit the number of cars that can get through the entrance to prevent people from parking in the Lot. With the artificial restrictions in place, the maximum number of cars that can get through the entrance to the 196+ space lot is about 55-85+ cars per hour depending upon the mix of payment methods used by visitors and other factors. The entrance should have a maximum capacity of up to about 250 cars per hour depending upon the systems used.

The line of cars trying to get into the lot often ran past Dell Ave on summer weekend afternoons and sometimes on winter weekend afternoons. The parking lot attendant told me that the line often ran to Ocean Ave over a quarter mile away before covid. The capacity of the entrance has been artificially restricted to the point that during peak summer hours it frequently operates with cars lined up trying to get in continuously for hours without filling the spaces in the parking lot.

A survey prepared by the City on Saturday July 20, 2019 showed an average of 43.5 cars per hour leaving the lot via the 3 exits throughout the afternoon, which is relatively close to the maximum capacity of the entrance. (Exhibit 17 Traffic Counts 7-20-2019 Lot #731.) The most vehicles entering during a 15 minute period is 18 which would be a 72 per hour rate. The most in an hour on that day is 63, which is similar to what I observed with continous lines in the summer of 2021. Because of this, the line of cars to get in can run continuously all afternoon without coming close to filling all the spaces. With a few changes that would quickly pay for themslves, Lot #731 would fill up in less than half an hour on summer weekend afternoons.

The City has added the following unnecessary steps for the attendant to keep cars from getting into Lot #731.

- 1. Walk back to the attendant stand after every car leaves.
- 2. Punch parking ticket three times on clock at attendent stand.
- 3. Walk back to rear of the car to look at the license plate.
- 4. Write down Vehicle License #.
- 5. Walk to front of car, tear a portion of the ticket and put in on the Windshield
- 6. Tear another portion of the ticket, reach into the vehicle and place it on the dashboard.
- 7. Check driver's license if using credit card.
- 8. Process credit card on a terminal that takes about 40 seconds. (Compared to less than 10 seconds at other parking lots managed by the same operator.)
- 9. Have driver sign and return credit card slip.
- 10. Give explicit directions to park on west side of lot to make east side look empty. (On some days)

(See Exhibit 18 with Video of Attendant working at Entrance.)

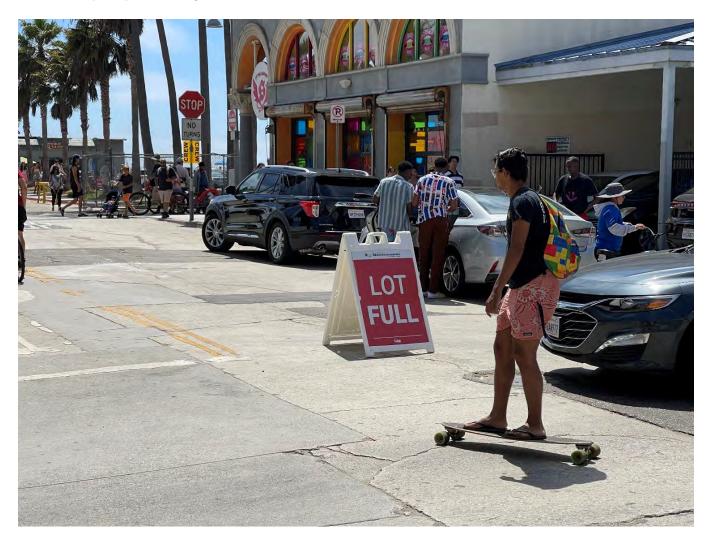
Not one of these steps is used at the three lots on the beach which were managed and operated by the same company until recently.

The City is charging twice as much at Lot #731 compared to the lots at the beach, causing most cars to show up after the lots at the beach have filled up. The entrance to Lot #731 gets overhelmed when this happens

Cash customers who were ready to pay generally got through the entrance at Lot #731 in about 25 to 60 seconds, most commonly around 45 seconds. The Average Credit Card Transaction took about 2 minutes, if there are no delays or problems. The long line to get into the lot doesn't move for about two minutes or more every time someone pays with a credit card. Most people leave before they get to the entrance when they have to wait for more than a few minutes. People don't wait in a line that doesn't move.

The problem with the entrance to Lot #731 would be very easy to fix and the cost of any upgrade in parking systems would be recouped almost immediately. Simply removing the unneccesary steps would be a huge improvement that would produce a dramatic increase in car counts and revenue at no cost.

21. Summer 2022 Weekends Update as of August 7 2022: The lot on Venice Beach fills up and starts turning vehicles away early in the day every weekend and continues to turn them away off and on for the rest of the day as Lot #731 also turns people away.



The parking lot at Venice Beach started turning people away sometime around mid-day every weekend, opening and closing the entrance for the rest of the day. On some days, the entrance was closed most of the time during the afternoon.

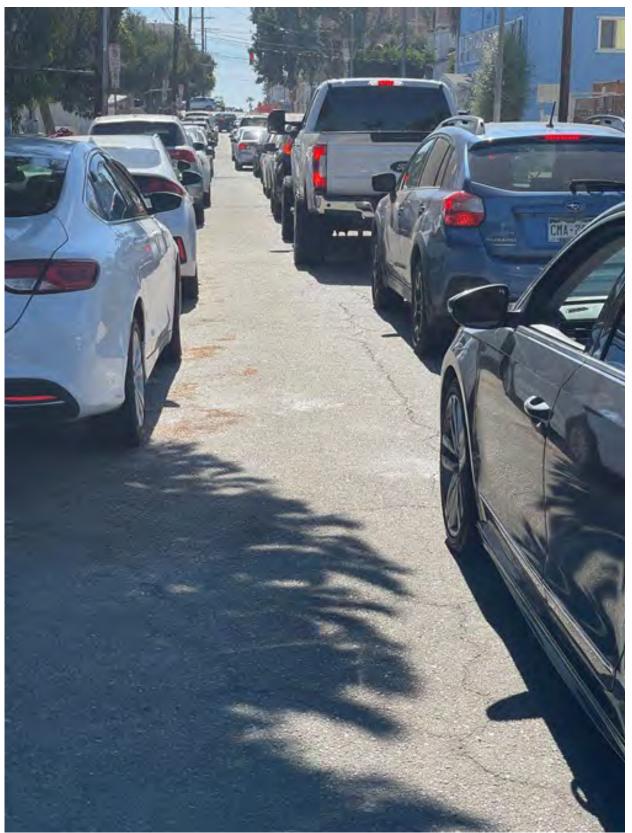
The lines of vehicles trying to get into the City owned parking lots at Venice and Washington Blvds are also longer.

Starting on July 9, 2022, a second parking attendant was added on weekends at Lot #731. With the second attendant helping to expedite cars at the entrance, Lot #731 filled up, turning a lot of cars away every weekend. I still saw some long lines of cars trying to get into Lot #731 before it filled up. Lot #731 would have had a higher occupancy level and filled up faster if the other impediments at the entrance were removed. On July 9, the attendants raised the price at Lot #731 to \$30.00 as the Lot started to fill up.

22. These pictures from the summer of 2021 show that Long Continous lines of cars could not fill up the spaces at Median Lot #731 because the City has artificially limited the number of cars that can enter per hour. The attendant told me that before covid, they would have to close lot on the weekends during the summer as the lines started earlier and were even longer.

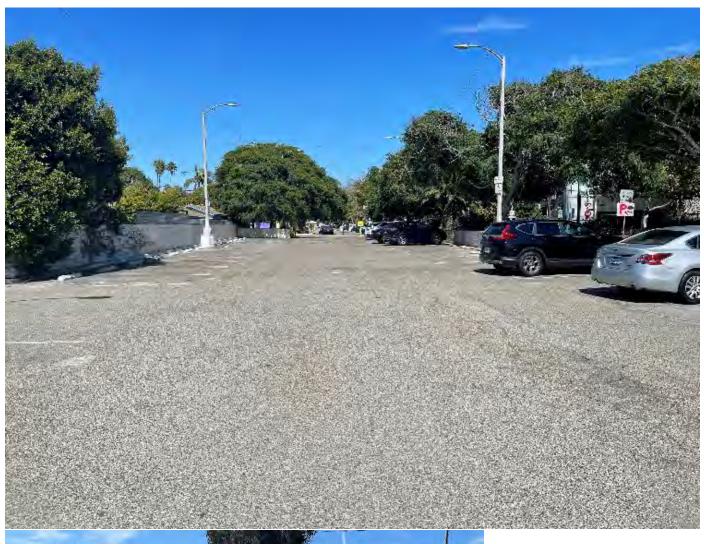


Line of Cars trying to get into Median lot #731 at 2:05 pm.



Same line still running without interruption at 2:56 pm. Most people give up before they get to the entrance because it looks like the lot is full with the long line barely moving and there is no way to know the cost until you get to the front of the line. The people who leave flood the nearby streets looking for parking.

These two pictures were taken around 3:05. The lot was still "empty" after accepting cars continously without interrption for an an hour.

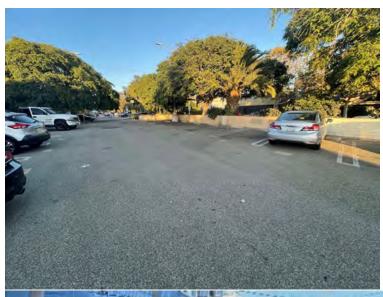




The two pictures below were taken around 4:15 on the same day. With a continous line of cars trying to get into Lot #731 for over two hours, it was still "empty."









The line of cars past Dell Ave trying to get into Lot #731 when I returned to the lot after 6 pm on the same day. The top picture shows that Lot #731 was still "empty" at 6:30. These lines are a deteremt to coastal access and use a lot of energy unnecessarily.



This picture shows cars Lined up past Dell Ave trying to get into Lot #731. Most of these cars will leave before they get to the entrance in part because the line stops moving for about 2 to 4 minutes when people pay with a credit card. Even with so many people leaving, it takes about 20 to 30+ minutes to get to the front of the line. It would take about an hour or more to get to the front of the line if no one left. This problem with vehicles backing up in the street and the lot not filling up would be easy to fix at Lot #731 and impossible to fix in the proposed parking garage.



Above, cars lined up past Dell Ave trying to get into Lot #731. Some of the longest lines were in March and April before the massive wave of bad publicity about Venice. According to the attendant, the lines were much longer before Covid running all the way to Ocean Ave over one quarter from the entrance to Lot #731.

23. The problem with cars backing up in long lines in the street and not being able to fill the spaces documented at Lot #731 would be even worse at the Reese Davidson development.

The "Staffing Plan" submitted with the Coastal Development Application show that the new parking garage was designed to handle about 65 inbound vehicles during the peak hour, which is about the same as or less than the inbound capacity at Lot #731 during the summer of 2021. (Exhibit 19 Staffing Plan) This is totally inadequate to meet the peak hour demand when the lot at Venice Beach can turn away about 50 cars in about 5 minutes when it fills up with more constantly being turned away as long as it stays closed. Cars turned away from the 2 other public lots on the beach also add to the demand.

A survey prepared by the City on July 20, 2019 showed an average of 43.5 cars per hour leaving the lot via the 3 exits throughout the afternoon, which is relatively close to the maximum capacity of the entrance. (Exhibit 17 Traffic Counts 7-20-2019 Lot #731) With 65 cars entering per hour and 43.5 leaving, the net increase in occupancy in the parking garage would only be about 22 spaces per hour. A continous line of cars starting at noon could not fill up the garage before the day was over.

The inability to keep up with inbound demand and to fill the spaces after the other lots fill up in the peak weekend afternoon hours are fatal flaws in the design for the public parking garage.

24. In August 2020, the parking experts working for the developers told them that the maximum number of parking spaces that could fit in the building envelope for the public parking garage was less than the number required to build the development.

The public parking garage prepared by Parking Design Associates for the developers of the Reese Davidson Project states:

"We have engaged in a thorough conceptual design process where we carefully study any and all reasonable potential options for the site."

220 spaces is "approximately the maximum parking capacity the garage envelope can feasibly accommodate." (Exhibit 11 PDG Parking Proposal, at page 4) According to Tierra West, they needed to have 260 spaces. (Exhibit 7 Tierra West LADOT Parking Study at page 21)

Instead of making the building bigger, the developers packed the undersized garage with double car stackers, tandem double car stackers and tandem spaces. (Exhibit 20 East Garage Public Parking Plans) Ten of the claimed "parking spaces" shown in these plans are vehicles put in the traffic lane behind other vehicles, including 2 vehicles blocking the handicap space. (Exhibit 20 East Garage Public Parking Plans at page 3) Almost all of the traffic lanes would be surrounded by cars that the valet attendants would have to pull out blocking traffic to get other cars out. At the entrance and in other places, two cars would have to be parked in the traffic lane to get one out.

A memo produced by LADOT in response to a document request shows that the garage designers ignored the design notes to get the capacity over the 220 "maximum parking capacity": "3. Congestion/bottleneck can happen when attendant temporary park 2 cars in drive aisle while unloading the 3rd car from the lift. (drive aisle = 28', typical car width = 6.5', 21.5' can be a tight space to maneuver for 2-way traffic). This is also true of the tandem parking spaces. In order to reduce this, tandem and lift spaces should all be relocated as far away as possible from the ground level and the garage entrance." (Emphasis added) (Exhibit 7.1 PFD Feedback on Design-1)

As shown in the garage plans, most of the traffic lanes throughout the entire three story garage are surrounded by vehicles blocked in by other vehicles or blocking other vehicles, starting at the entrance. The developers totally ignored the design note telling them to relocate the tandem and lift spaces away from the entrance, putting car stackers in tandem spaces right at the entrance with more car stackers on the other side of the traffic lane and more car stackers right next to the ramp going up. On the 2nd floor, the design puts more tandem spaces and cars parked behind other cars blocking the traffic lane. The garage would be blocked right at the entrance every time an attendant needed to place vehicles in the drive lane to get a vehicle out. This problem would be happening on all three levels of the garage, getting much worse as the garage got busier.

Because the undersized garage does not have room for a valet zone, families would have to unload their children, strollers, bikes, umbrellas, coolers, beach chairs and other beach gear in the middle of the traffic lanes with lines of cars waiting behind them. The unloading and organizing in the parking lot takes 5 to 10 minutes for many groups and families at Lot #731. This would add additional blockages to the flow of cars in the garage.

Families leaving would also block the flow of traffic as they put all of their stuff back into their cars.

25. The failure to include a valet zone in the new public parking garage is another fatal flaw in the design.

Because the building is too small, the developers did not include any space for a valet zone for families to load and unload their vehicles in the public parking structure. This would force families with small children to unload and load their vehicles in the middle of the traffic lanes, surrounded by car stacking machinery with other vehicles lined up behind them. This would be unworkable, unsafe, stressful and unpleasant. It would also block the flow of vehicles in the garage.

Almost all of the visitors using Lot #731 during my visits on weekend afternoons were going to the beach, canals and/or boardwalk. A lot of the vehicles are packed with family members. Most of them take a lot time getting things out of their vehicles and a large percentage have a lot of bulky items including strollers, bicycles, umbrellas, coolers, beach chairs, toys, carts and sporting goods. A huge percentage of the people parking in Lot #731 spend 5 to 10 minutes getting things out of their vehicles and organized before they head to the beach.

26. A lot of the parking that is supposed to be dedicated for beach parking would be displaced by onsite use at the Reese Davidson mixed use development.

The west garage did not have enough parking even before the developers reduced the capacity from 143 vehicles to 108.

Pursuant to the Venice Local Coastal Land Use Plan, the Reese Davidson Development is required to have 430 spaces for onsite use:

Spaces Required
78
232
29
11
17
10 (Est)
43+
3
7

Total Required 430*

The west garage would only have 105 spaces for onsite use instead of the 143 included in the Architect's plans for the project, leaving the project more than 75% short from the number required by the Land Use Plan.

LADOT's own expert concluded that more parking should be also added for affordable housing and the art studio. (Exhibt 7, Tierra West LADOT Parking Study, Page 23) The additional spaces for the affordable housing and art studios were never added.

Almost all of the people parking at Lot #731 use it for beach and coastal access. Except for some visitors going to the Historical Canals, almost 100% of the people observed parking on weekends at Lot #731 during this study went towards the beach. The proposed project would turn the "Venice Beach Parking" lot into a "public parking facility to accommodate predominently public, or transient traffic." In other words, much of the parking currently dedicated to beach and coastal access would be used for onsite use at the Reese Davidson development.

27. The Meeting room adjacent to the beach parking lot would displace beach parking and overload the parking attendants.

The plans for the Reese Davidson development include a 3155 square foot "community arts/community meeting space" attached to the east garage. The developers are now calling this same space an "Art Studio", to reduce the amount of parking provided down to only six spaces. Online calculators for event planners show that a space of this size could accommodate more than 300 people at a time for a reception or theatre type event. Section 1004.5 of the California Building code calculates occupant load for Assembly without seats based upon one person for every 7 to 15 square feet. At one Person per 15 square feet, the 3155 could have a capacity of 210 people.

The Venice Community Housing Corporation holds events to promote their organization. The website for the Venice Community Housing Corporation has a picture of their Champagne Brunch. During peak hours, the meeting rooms, restaurant and retail space would use a good amount of the parking spaces and limited capacity for inbound and outbound vehicles in the east garage, displacing visitors going to the beach and historical canals.

28. The developers of the Reese Davidson project have failed to comply with the Venice Local Coastal Land Use Plan requirement for a "detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities." (Page III-10)

The Tierra West Parking Study prepared for the City concluded that the planned parking would not be adequate: "more parking spaces need to be assigned for affordable housing unit uses and art studio uses to meet ITE standards" (Exhibit 7 Tierra West LADOT Parking Study at Page 23) The developers ignored this recommendation.

29. The Reese Davidson development could not provide enough parking for onsite and coastal demand because the developers eliminated 2 levels of parking in the east garage and 1 level of parking in the West Garage.

The Reese Davidson development was designed to have 4 levels of parking in the west garage and 5 levels of parking in the east garage with 395 coventional parking spaces as shown in the Architect's plans. (Exhibit 21 Architect Plans at pages 2 and 7) The plans provided for 143 conventional parking spaces in the west garage and 252 conventional parking spaces in the east garage to get to the 395 total. Exhibit 21, at page 2) The December 2018 Initial Study of the project prepared for the planning department states that the project would have up to 436 "vehicular parking spaces."

The developers eliminated 2 levels of parking in the east garage and one level of parking in the west garage.

The developers released the architects plans for the project in 2017, promising that the final plans would be out within a few months. They have spent the last five years working without success to come up with a workable plan to provide the required number of "parking spaces" in the undersized parking structure. The developers and their vendors will lose a lot of money if this project is not built. The final design gives them the right to claim that the parking garage will have 252 spaces at the expense of coastal access for the public.

30. Because it would be a major deterrent to use, especially by low-income and disadvantaged groups, converting the parking lot from self parking to valet parking would violate the coastal act.

Many people will not use valet parking because of the cost, concern about damage to the vehicle and the risk of theft. Many others, including me, will go to great lengths to avoid valet parking.

Valet parking is also exclusionary because low-income and disadvantaged groups will be most deterred by valet parking because they cannot afford the tip and are less likely to use Valet parking in other settings.

31. The proposed parking garage would not be able to provide a satisfactory customer experience, particularly for visitors using the "economy" level that uses valet attendants and car stackers.

- •The wait for the attendants to accept or return vehicles would be way too long, especially during the during peak hours or when they were short staff, often to the extent that people would never go back.
- •Unloading and reloading vehicles in the busy traffic lanes surrounded by mechanical lifts would be noisy, dangerous and stressful, especially for large families with lot of small children.
- •There is no safe space to gather to wait for the attendants to return a vehicle.
- •Families would be rushed to unload and reload their cars, with long impatient lines of behind them during peak hours compared to having all the time that they need to unlo
- •Dealing with tips and tipping customs would be very stressful for many people, expecially low-income visitors and disadvantaged groups.
- •There would be a wait for an elevator when people were using bikes or other bulky items big enough to fill the elevator cars.
- •The elevators would have very long backups every time there was an event using bicycles.

- •Many tourists and others with limited english language skills, people with little or limited reading skills and older visitors with would not be able to navigate the complex and unique systems planned for the public garage, which would frustrate them, exclude them and slow down the operation of the facility.
- •Even visitors who managed to navigate them would get very frustrated by the very confusing, complicated and totally unique procedures and systems planned for the garage.
- •Visitors could get stuck with indefinite waits in the garage when the valet attendants got overwhelmed
- •It would take more than 2 hours to empty a full garage in the case of lightning closure, distant tsunami, July 4th, special event, concert or any other circumstance where people would want to leave at the same time. (This alone is another fatal design flaw of the beach parking garage.)
- •There is no place to gather, socialize or meet your friends
- •The attendants would get overwhelmed any time that the schedule did not anticipate that it would get busy leading to more lenghty waits.
- •Some vehicles would be damaged by attendants and personal possesions would go missing.
- •Low-income families and disadvantaged groups rushing to get their families in and out of their vehicles in the middle of the dangerous traffic lanes and enduring long waits for the valet attendants to return of their vehicles would watch wealthier visitors drive off almost immediately after leasurely loading their vehicles in a relatively safe location.
- •The walk to the beach would single file with no room to carry bulky items and a lot of other people going the other way.

Visitors to the existing parking lot would not experience any of these problems. Once the issues with the entrance are fixed, everything about the existing parking lot would be a great experience where families would have all the time they wanted to unload their vehicles, dress and organize for the beach, put on sunblock, check out their bikes, socialize and gather with friends before they walked to the beach. They would also have immediate access to the three exits when they were ready to leave.

32. Under the developers' plan to "segregate" visitors at the public parking structure, most visitors would be forced to use the dangerous and inconvient attendant/car stacker system with long waits for the return of their vehicles while rich people would would be provided with a safe, convenient place to park and drive away immediately.

The plans for the Reese Davidson public parking garage were literally designed for the "segregation of user groups." (Exhibit 11 PDG Parking Proposal, page 7)

Equal access to all public facilities is an essential element of civil rights in America. The plans to segregate visitors at the Reese Davidson by allowing the wealthy to buy their way out of the dangerous and inferior parking services at the publicly owned beach parking garage violate the Coastal Commision's Environmental Justice Policy.

Families paying the "economy" rate at the public garage will be forced to quickly unload and load their vehicles in the middle of the dangerous traffic lanes surrounded by car stacking machinery with cars coming at them from at all sides. When they return from the beach, these families would have to endure long waits standing in the traffic lanes waiting for the return of their vehicles while watching wealthier visitors get immediate access to their vehicles to drive off. Most low-income residents and disadvantaged groups would be in the economy section.

In addition to segregating the parking garage, the Reese Davidson development will decrease diversity at the beach itself by driving prices to a level that excludes low-income residents and other disadvantaged groups.

The pricing plans for the Public Parking Garage are based upon the premise that self-parking is worth 3.75 times as much as the valet parking at this facility. In other words, the proposed valet parking facility would offer parking that is less valuable for a much higher price compared to the existing parking lot.

33. The City plans to continue the existing practice of limiting the use of the median parking lots to overflow from the Venice Blvd Lot instead of using it as a primary lot offering affordable parking and as overflow for all three of the City's beach lots would minimize beach access in Violation of the Coastal Act.

I watched thousands of cars being turned away from the 3 City owned beach parking lots during the Summer of 2021. Not one of these drivers was told when there was parking available in the Venice Median when they were turned away.

The City's plans for the Reese Davidson development are to continue to limit the use of the two Median lots primarily to "overflow" for the Venice Blvd Lot. This plan ignores the the huge unmet demand for affordable beach parking, the need to provide parking for the large number of cars being turned away from the Washington Blvd and Rose Ave Beach Parking lots and the fact that most of the cars turned away from Lot #731 never make it to the median parking lots.

In my visits to the beach, I would ride my bike to the beach through both parking lots in the Median, watch 50 cars being turned away from the City's beach lot in a short period of time. When I rode my bike back to the Median, the number of cars in the lots from all sources had not changed significantly in the time that I was gone.

Recently, I followed the cars being turned away from the Venice Beach lot to see where they were going. Only a tiny portion drove to the Venice Median Lots. After changes are implemented to direct cars turned away from the 3 lots on the beach to the median parking lots when spaces are available, the City should do a study to determine how many of those vehicles are parking in the median and to find out why the others do not.

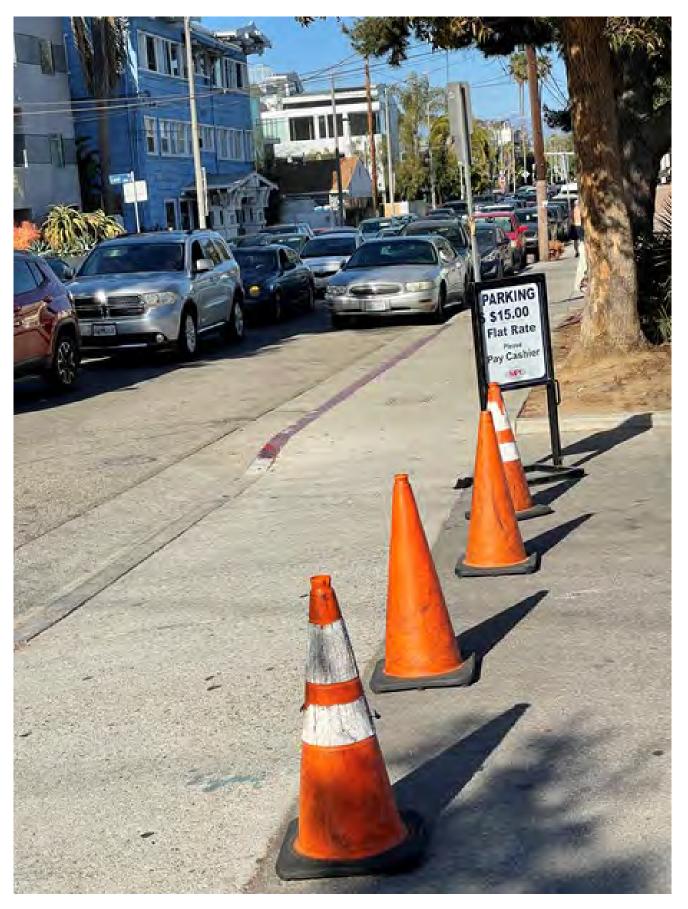
The only way to maximize beach access in Venice would be to lower the price at the Median lots enough to make them the primary lots for visitors looking for affordable parking, while directing cars turned away from all three lots at the beach to the Median when there are spaces available.

35. The attendants close Lot #731 during peak hours at least once a day when there are still spaces available as an additional deterrent to beach access.





The Parking Attendants shut down both of the Median parking lots daily for about 10 to 20 minutes between 4 and 5 pm, even when there are plenty of spaces available and long lines of cars waiting to get in, further reducing beach access and the number of cars in the Lot. In this case, cars lined up past Dell Ave were turned away. There were plenty of parking spaces in the lot when the attendants put out this "Lot Full" sign.



Lot #731 had plenty of spaces available when these cars were turned away.

36. LADOT keeps Median Lot #701 locked to the public on most days of the year instead of using it as a 365 affordable beach parking option for low-income residents who cannot afford to pay the \$20.00 winter weekend rate at Lot #731.





LADOT keeps Lot #701 locked to the public even when it is charging \$20.00 to park in lot #731, instead of making this publicly owned facility available for coastal access. It is also kept locked on days when the neighborhood is flooded with cars looking for parking. (See Exhbit 11.5-Folder with Videos showing Lot #731 locked while streets are flooded with cars looking for parking.)

The Coastal Commission Permit for this parking lot specifically states "Both Lot 701 and 731 shall remain open and in use for public beach parking during all hours of operation (every day of the week)" (Exhibit 23 Staff Report Lot 701 9-24-01)

To comply with the City's Coastal Permit, LADOT needs to remove the padlocks and chains blocking access to this public beach parking lot. Free parking and/or Pay Stations with low rates would provide affordable beach access low-income visitors and other disadvantated groups 365 days a year and a lot of new revenue for the City.

The demand for beach parking is so strong in this location that Lot #701 generates more annual revenue per space than the beach lots at Will Rogers 3, Zuma, Bluff, Nicholas Canyon and Torrance even though it is kept locked most of the year,

Locking the public out from a publicly owned beach parking lot at one of the busiest year round beaches in California in violation of a Coastal Permit is about as bad as you can get in terms of violating the public access provisions of the California Coastal Act. The fact that LADOT is charging \$20.00 for parking at Lot #731 at the same time makes this that much worse. These acts are clearly intended to prevent coastal access to facilitate the City's plans to use the Venice Median for housing and commercial development.





Above: The neighborhood was flooded with cars looking for parking while Lot #701 was locked to the public when these pictures were taken in March 2021.

37. The entrance procedures at Lot #701 also reduce the number of cars parking in the Median.

The entrance to Lot #701 uses the same procedures used at Lot #731, except for the fact that they do not take credit cards. The line to get into the lot often backs up on Dell Ave and Venice Blvd disouraging people from using the lot.

The fact that Lot #701 does not have the ability to take credit cars also discourages people from using it.

38. There are two signs like this on North Venice Blvd diverting cars away from Lot #731 before they get there. These signs direct beach visitors away from lot #731, to Lot #701 which the City keeps closed and locked most days of the year.



This permanent sign and a second sign just like it divert westbound vehicles on their way to the beach on Venice Blvd away from Median Lot #731 and the parking lots at the beach. Visitors who follow these signs are directed to Lot #701, which the City keeps locked to the public most days of the year. After being directed to the closed parking lot, visitors are forced to turn onto South Venice Blvd, which is a one-way street heading away from the beach and all the beach parking lots.

In her 2015 article, Architectural Exclusion: Discrimination and Segregation through Physical Design of the Built Environment, Sarah Schindler discusses the use of confusing signs as an exclusionary tactic.

39. LADOT Parking Lot #731 generates more revenue per space than any other parking lot owned by the City and more revenue than any beach parking lot managed by the County with the possible exception of 2 of the lots on Venice Beach.

The City's designation of Lot #731 as an underutilized property and conclusion that there are there are an adequate number of beach parking spaces in Venice are nonsensical given its revenue, customer counts and documented history of operating at over 100% Capacity.

The average annual revenue for Lot #731 is \$1,020,821, whichs ranks it #1 for revenue per space among all 119 parking lots owned by the City. (Exhibit 24 Parking Revenue LADOT LOTS) It also generates significantly more revenue per space any beach parking lot managed by the County that is not in Venice. (Exhibit: Beach Parking County Revenue Per Space)

Five percent of all of the revenues from the 119 City owned parking lots with 11,400 spaces come from Lot #731. (Exhibit 24 Parking Revenue LADOT LOTS) The revenues from Lot #731 would be much higher again if the City stopped trying to keep people from parking in it and fixed the problems exposed in this report.

The annual customer count for Lot #731 is 71,000, which works out to a year round average of 194 cars a day 365 days a year for a beach parking lot with 196 spaces. (Exhibit 7 Tierra West LADOT Parking Study at page 31.)

Lot #731 and the three lots on the Beach all generate a lot more revenue per space than any other beach parking lot managed by the County. (Exhibit 25 County Beach Lots Revenue vs Median Lots) The Venice Beach, Washington Blvd lot and Lot #731 generate well over twice as much revenue per space than any other lot managed by the County, except for the Venice Rose Ave and Surfrider lots. (Exhibit 25 County Beach Lots Revenue vs Median Lots)

40. The results of the "Parking Study" used to justify the Reese Davidson development were falsified.

Tierra West claims that that they did the parking surveys for their study "during the peak summer months (July 2019-September 2019)". (Exhibit 7 Tierra West LADOT Parking Study.) (Exhibit 7 Tierra West LADOT Parking Study, page 10.) This is not true.

The contract for the Study was not signed until the end of August 22, 2019. (Exhibit 27 Tierra West Contract Signed August 22, 2019) and the "data" shows that their non-holiday weekend parking surveys were limited to two weekends after the schools had reopened in September when beach visits drop by more than 50% from their July peak. (See Exhibit 28 Beach attendance and bathing rates, at page 5) showing that Southern California beach visits drop from 28.1 million in July to 12.2 Million in September.) The revenues for Lot #731 show a similar drop, in spite of the fact that Lot #701 closes for the season at the beginning of September, with customer counts at Lot #731 going from 11,401 in July to 6251 in September. (Exhibit 30 2018-2019 Revenue by Month Lots 731 and 701)

The data for the Tierra West weekend non-holiday parking "survey" shows that it began on September 7, 2019 and ended on September 17, 2019. The City's plans to build the Reese Davidson Development are based upon a peak summer season parking survey that was done after the peak summer season had already ended. There is no study to rebut the overwhelming evidence documenting a shortage of beach parking during the peak summer months.

The Tierra West Study was presented to the Coastal Commision staff to show that there was no unmet demand for parking at Lot #731 and the surrounding area. LADOT approved the study knowing that the Tierra West contract was not signed until late August and that Tierra West started gathering the data at the beach after that date.

In approving the Tierra West Study that was presented to the Coastal Commision, LADOT management also failed to disclose information known to them that contradicted it. LADOT knew that Lot #731 was filling up to capacity during the summer, which was in direct conflict with finding in the Tierra West Study. (Exhibits: See Summer 2017 Daily Revenue, Lot #731 fills to capacity and Lot #731 fills on weekends and hot weekdays) LADOT also knew that beach traffic declined in September and that the City closes Lot #701 for the season in early September around the time that the Tierra West Study was done.

The Tierra West Study also fails to disclose almost all of the significant facts and issues relevant to the parking lots and beach access in Venice, including the City's efforts to discourage beach parking and use of Lot #731, the well documented long standing history of the beach parking shortage in Venice, the fact that Lot #731 generates more revenue per space than any beach parking lot managed by the County that is not in Venice, that Lot #731 was charging \$30.00 when the lot on the beach was charging \$18.00 while they were there, the documented history showing Lot #731 operating beyond 100% capacity, the large number of cars being turned away from the City's parking lots while they were there, the long lines of cars waiting to get into the City's beach parking lots, the fact that the number of cars waiting to get into the City owned

lots is often about the same as the number of empty spaces they claimed to be counting and the temporary impact of the homeless crisis on current demand.

Counting empty parking spaces after the peak season is over to determine unmet peak season demand for affordable beach parking in a lot charging four times the market price when there are signs directing people away from it and the entrance has been reenginered to prevent people from getting into the lot is an exercise in deception, not a study.

From a social, racial and economic justice point of view, the only equitable measure of unmet demand for beach parking in Venice is the huge number of people in Los Angeles who do not have beach access, including many children who have never even seen the ocean. Given the fact that the City only has about 1350 public beach parking spaces in all of Venice to provide parking for 4 million City residents and 10 millon people in the County at a beach shared with millions of tourists, it is obvious that the the City does not have enough parking spaces to meet unmet demand, particularly among the 5 million county residents who cannot afford to pay the rates the City is currently charging.

41. These pictures show that the Lot #731 was charging almost twice as much as the lots on the beach while Tierra West was there conducting its survey to determine the demand for parking at Lot #731.

While riding my bike to the beach in 2019, I saw that the City was using high prices and a blocked entrance to prevent people from parking in the the Median lots. I interrupted my ride to take these pictures. This was only the second time I had taken pictures documenting what was going on at the Median Lots. I found out much later that this was the same time that Tierra West was there for their parking counts.



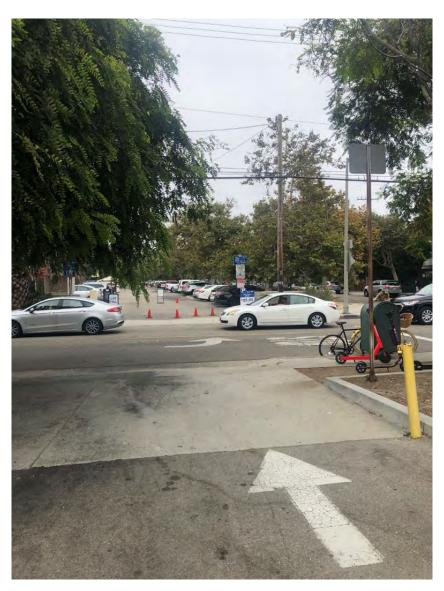
Lot #731 was charging \$30.00 at the same time that the Lot on Venice Beach was charging \$18.00 while the parking demand study was being conducted.

42. This Picture shows the entrance to Median Lot #701 closed and blocked off while Tierra West was supposed to be counting unused spaces in the lot.

This picture was taken at 2:40 pm during the same 60 minute period that Tierra West claims that they were counting unused spaces in Median Lots #701 and #731. The attendants for Lot #701 coned off the entrance and posted the Lot Full sign while there were still about 20 unoccupied spaces in the lot. Tierra West reported the 20 unused spaces without disclosing that the lot was coned off and that the streets were backed up and flooded with cars looking for parking.

This picture also shows that cars backed up on Dell Ave searching for parking. Tierra West claims that there were 34 unused spaces in Lot #731, without counting the long line of cars backed up trying to get into the lot.

I Have more pictures showing that Lot #701 had about the same number of empty spaces as reported by Tierra West around the time that this picture was taken.

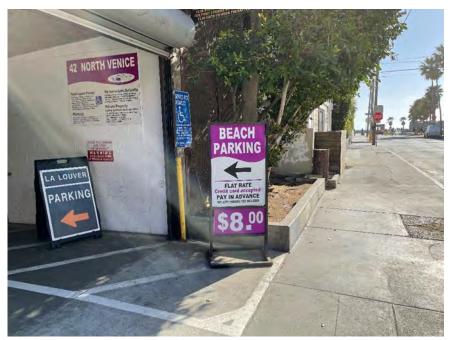


This picture also shows that Median Lot #701 was charging \$25.00 for parking 2 blocks from the beach at the same time that the lot on the beach was charging \$18.00.

43. The City's plans to allow mixed use development in the Venice Median would set the stage for a future where only the rich could afford to pay for parking at Venice Beach, which would reduce economic and racial diversity at the beach.

When the Covid and homeless issues are behind us and the City gets around to fixing the other problems that have been driving people away from Venice beach, the City's parking lots that are turning people away all summer long will be increasingly overwhelmed with vehicles in the near and long term.

The private parking lots can and will charge whatever the market will bear as demand increases and supply decreases. Low-income and disadvantaged groups will be excluded from Venice beach unless the existing beach parking lots owned by the City are preserved and expanded to the maximum extent possible.





The Picture on the left was taken in April 2021 at the 125 space privately owned parking structure at Venice Beach. The picture on the right was taken at the same parking garage on March 6, 2022 when it was a cold 57 degrees in Venice. This garage replaced the \$8.00 winter rate sign on the street with a \$25.00 sign inside the garage because LADOT was charging \$20.00 a block further from the beach at Lot #731. LADOT's efforts to justify the Reese Davidson development caused the cost of parking to triple in only 12 months.

44. The private beach parking lots in Venice will be developed for more valuable uses as the area changes in the not too distant future, drastically reducing the supply of parking at the same time that demand skyrockets.

Surface parking lots have long been considered a transitional use of property in anticipation of profits from future development. This is the case for almost all of the private beach parking lots in Venice which are on properties that will be redeveloped for other uses, drastically reducing the parking supply while demand increases. To the extent such properties continue to operate, they will need to charge the maximum prices possible in order to survive, excluding a majority of the City's residents.



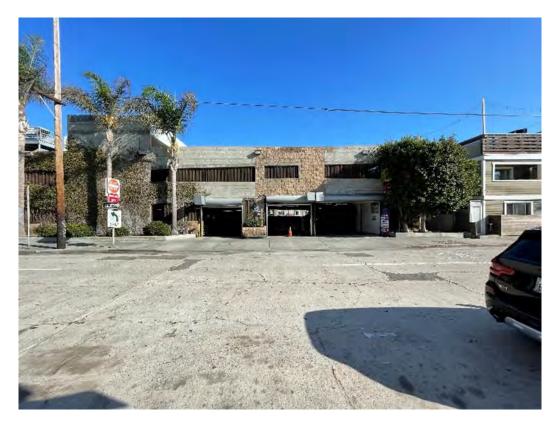


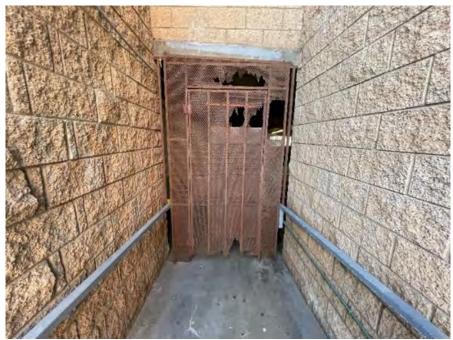






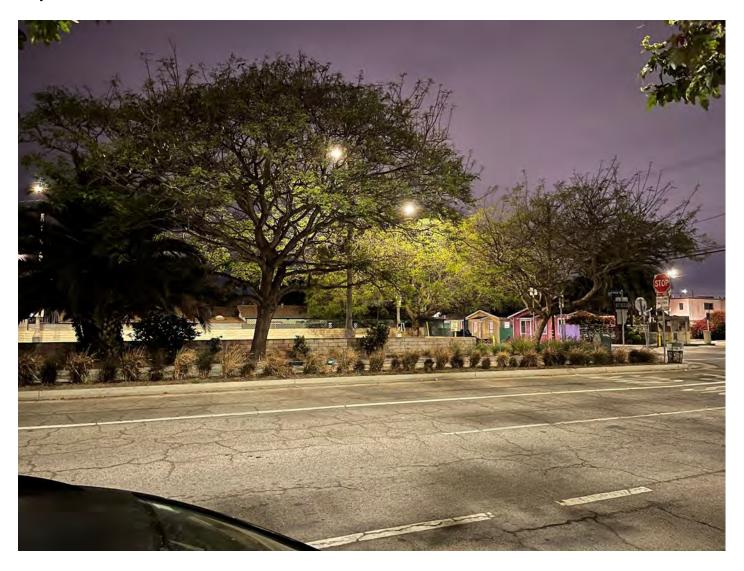
45. This 30 year old parking structure located between the Median and the beach should reach the end of its service life in the next 5 to 20 years, eliminating parking for 125+ cars at Venice beach.





The anticipated service life of a parking garage is about 30 years. Service life in coastal locations can be shorter. Given the age of the garage and the development potential of this beach property, this site is almost certain to be converted to another use during the first 5 to 20+ years of the development's 99 year lease, taking 125+ beach parking spaces with it.

46. Development in the Venice Median would eliminate the Open Space in the Historical Canal District which is supposed to be protected, preserved and expanded.



The Eastern portion of Lot #731 with Lot #701 on right. The tree lined open space is an essential signature element of the Historical Canal District. This is my favorite place for walks when I want to get away from the noise and crowds at the beach.

The Venice Median is zoned for use as Open Space to be preserved and protected. The City wants to change the zoning to Commercial for the Reese Davidson Development.

The Venice Community Land Use Plan calls for the preservation of the existing Open Space including the Venice Median. The plan also calls for expanding open space where possible. The Reese Davidson Development would eliminate almost all the land designated as Open Space in the neighborhoods around the Median, reversing long standing plans to increase the amount of Open Space and Neighborhood Parks.

In the early 1990's. members of the Venice Community received a \$420,000 grant to plant to plant 1000 California Sycamore Trees in Venice, including 400 on Venice Blvd to

create a "European-Style thoroughfare" that would be a "Los Angeles version of the Champs Elysees." The tree line Median along Venice Blvd is a key feature of the historical canal district.

As described in Coastal Permit Application #5-94-081, Lot #731 has about 6000 square feet of landscaping which has been very poorly maintained by the City. (Exhibit 1 Staff Report Lot #731) Although the permit application for the Reese Davidson development claims that it will have 11,4017 square feet of landscaped area, the Architect's plans submitted with the application show that it will only have the 4930 square feet. (page 2 of plans)

The City has tried to take advantage of the their failure to maintain the landscaping using pictures focusing on sections that have been allowed to die at Lot #731 to promote the development. If properly maintained, the areas with the existing landscaping, including the area around the canal, boat dock, interior and exterior views of the property will all be much nicer than the proposed development. The Coastal Commission should require the City to restore and maintain the existing trees and landscaping.

The Reese Davidson project, which for all practical purposes has no outdoor recreational space on the 2.8 acre property, would add to the demand for park and open space at the same time that it eliminates the existing protected open space.

There is a severe shortage of neighborhood parks in all of the local communities surrounding the Venice Median. Except for the Dog Park, all the parks are postage stamp size. The median parking lots are the only properties large enough for adult recreational activities away from the huge noisy crowds at the beach. For me and some others, the open space in the Median is my neighborhood park.

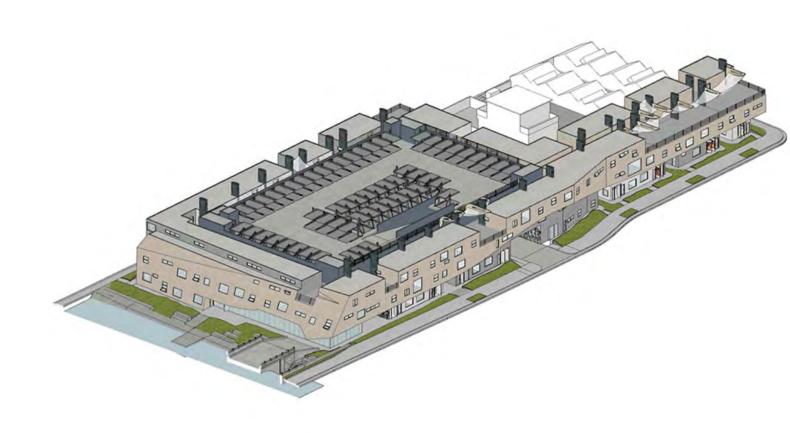
The minimum standard for neighborhood parks for a healthy community is supposed to be 3 acres per 1000 population. The neighborhoods surrounding Lot #731, in which almost all of the housing is on small lots with minimal space for outside recreation, do not come close to these standards. Other high-density cities average 6.8 acres per 1,000 people and more affluent less racially diverse areas of Los Angeles average 31.8 acres per 1000. Almost 65% of the residents of Venice are renters.

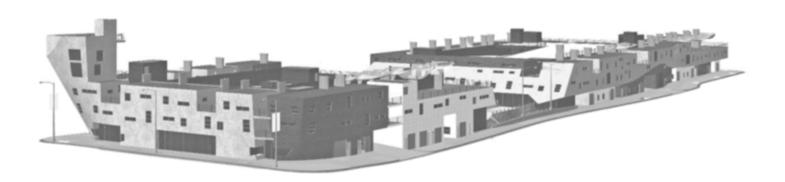
The neighborhood around the .04 acre Venice of American Centennial Park has .4 park acres per 1000

The neighborhood around the .06 acre Canal Park has .13 acres of park land per 1000

The neighborhood around the .03 Triangle Park has .03 acres per 1000 (Per L.A. County)

47. The Reese Davidson mixed use development would be a massive oversized, impenetrable mass destroying the protected Open Space and blocking access to the beach in this iconic location between the Historical Canals and the World Famous Venice Beach.





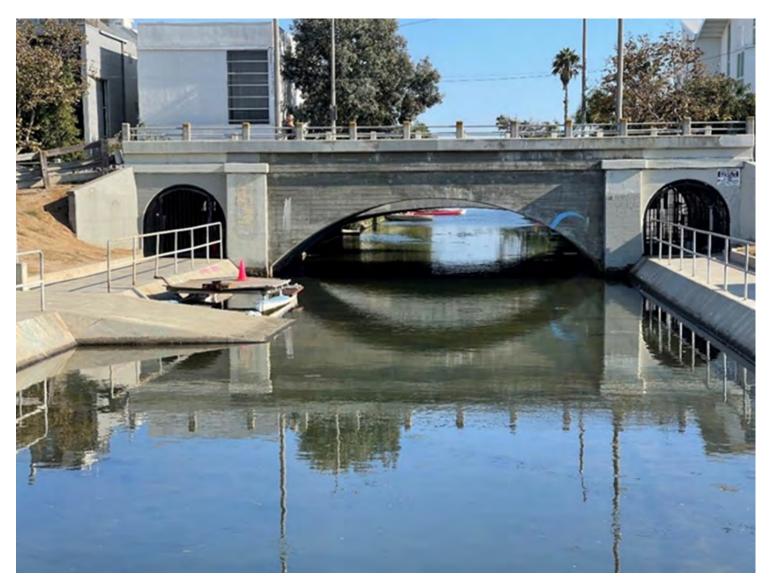
Top: Grand Canal, boat dock and west side of project. The massive structure would surround the Grand Canal on the property and overwhelm the view from the Canal south of Venice Blvd. Lower Picture: The tower in the picture would be facing Venice Beach.

The development would overwhelm and dominate the Grand Canal and the Canal District with its size and mass, covering almost all of the land except for the narrow substandard sidewalk and the tiny space adjacent to the Canal

The pictures used to promote the Reese Davidson development create the false impression of open space showing the existing canal and bridge without the massive development being added to the site. The Reese Davidson Development would cover almost every inch of the property creating an impenetrable mass that blocks views and beach access in this iconic historical location from all four sides.

A lot of people use the Median Open Space for meeting friends and socializing, sports activities, skateboarding, walking their dogs and hanging out doing things at their cars. Many people use it as a playground to play with their children. Others like to just hang out near one of the trees. I use the Median Open space for exercise.

48. The Reese Davidson development would be built on a Special Coastal Community and Historical site included in the National Register of Historical Places, blocking views and access in violation of the California Coastal Act and the Venice Coastal Program Land Use Plan.



Above: Side view of the Short Line Bridge with the Grand Canal in the foreground on Lot #731. The bridge was built in 1905. It is the oldest bridge in the City of Los Angeles. The Historical Canal divides the Lot #731 property into east and west sections. It connects to the rest of the surviving canal system on the other side of Venice Blvd to the south.



Above: Section of the Grand Canal across the street from Lot #731. The proposed site of the Reese Davidson development is divided by this same Historical Canal.

The Venice Historical Canal District, which includes the site of the proposed Reese Davidson Development, is listed on the National Register of Historical Places. This coastal property, along with the rest of the Historical Canal District, has historical, aesthetic, architectual and cultural signficance.

Most of the other lots that surround the Canals are about 2850 square feet. This project would surround the Grand Canal with a development almost 48 times that size. Its massive size would change the character of the entire Canal district.

The Canal System, Beach and Boardwalk are of tremendous significance for cultural, architectural and historical reasons. They are often described as the 2nd most popular tourist attraction in Southern California after Disneyland. The median is an integral part of Venice Beach, the historical Canals and Boardwalk that surround it, serving as a scenic tree lined gateway to the beach and providing almost half of the publicly owned parking spaces. This massive prison like mixed-use development would change the character historical canal district and the iconic attractions adjacent to it.



This picture shows the Grand Canal at Lot #731, with the Historical Short Line Bridge and Lot #731 in the background. Both sides of the Grand Canal are almost entirely surrounded by landscape areas with two more large additional landscape areas on both sides of the Bridge. All of the landscaping has died from lack of maintenance by the City. The Reese Davision development would remove the larger landscape areas around both sides of the bridge.

The main point of access to the canal is through the gate on Venice Blvd for the boat launch that the City keeps locked, which would be permanently eliminated by the Reese Davidson development. They tunnels on both sides of the bridge that provide access to the Canals from South Venice Blvd are also kept locked. The walkways shown in this picture also provide access from North Venice Blvd.

The developers of the Reese Davidson project claim that they will "expand access." The will do this by removing the padlocks on the arched gates under both sides of the bridge that go to South Venice Blvd. The City could remove the locks on the gates without building a new development, but it may be a very bad idea for crime/safety reasons in

this location. If the Reese Davidson development ever gets built, the locks on the gates probably will not be gone for long.

For the last 60 years, the City has spent huge sums of money improving and maintaining a similar Median on San Vicente Blvd in the wealthy and less diverse Brentwood neighborhood while it spent almost nothing on the Median in Venice. At the same time that the City was making plans to demolish the Venice Median Open Space, boat launch parking and access area and bikeway in 2019, it was planning new improvements to the Brentwood Median including, additional trees and a walkability plan recognizing "the importance of San Vicente Blvd to the identity of Brentwood." (Exhibit 31.1 Brentwood Median Improvements) This historical and iconic location in Venice deserves the same treatment.

The best option for the preservation of and access to the Historical Canal, Bridge and Open Space would be to remove the padlock blocking access to the boat launch and to restore the landscaping at the existing parking lot. The Reese Davidson Development would cover almost all of the 2.6 acre open space property making the existing open space inaccesible to the public.

49. The plans for the Reese Davidson violate all of these key and essential provisions of the Venice Coastal Program Land Use Plan.

The Venice Local Coastal Program Land Use Plan provides that all development, land use and coastal related activities in the Venice Coastal Zone are required to be consistent with the certified Local Coastal Plan. (Exhibit 1.3 Venice Local Coastal Program Land use Plan) The developers of the Reese Davidson project chose to ignore most of the provisions of the Venice Local Coastal Program Land Use Plan, including all of the provisions listed below.

- •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.
- •In order to preserve the character of the existing residential neighborhoods, lot consolidations shall not be permitted in the Venice Canals and Silver Strand neighborhoods.
- •Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.
- •New development within the Venice Coastal Zone shall respect the scale and character of community development.
- •Venice Canals Parks. New parks, with parking to the rear, shall be considered on some of the City-owned lots on the canals, provided that such facilities are compatible with the existing residential use of the area.

- •New recreational opportunities should be provided, and existing recreational areas, shown on Exhibits 19a through 21b, shall be protected, maintained and enhanced for a variety of recreational opportunities for both residents and visitors, including passive recreational and educational activities, as well as active recreational uses.
- a. Recreation and visitor-serving facilities shall be encouraged, provided they retain the existing character and housing opportunities of the area, and provided there is sufficient infrastructure capacity to service such facilities.
- b. Acquisition, expansion and improvement of parks and facilities throughout the Venice Coastal Zone shall be encouraged and accelerated, subject to the availability of funds.
- •The following buildings, streets, and trees have been identified through the coordinated efforts of surveys performed by the Venice Historical Society, Venice Community, State Coastal Conservancy and City of Los Angeles as significant architectural, historical and cultural landmarks in the Venice Coastal Zone. Canals Bridges
- •Venice Canals. The historic integrity of the Venice Canals shall be preserved. The canals are deemed to be significant as an early example of community recreational planning in a coastal marshlands area. Included in the historic district are the six canals, their associated sidewalks and a number of pedestrian and vehicular bridges. The Venice Canals are listed on the National Register of Historic Places as an historic district (August 30, 1982). Additionally, the City of Los Angeles Cultural Heritage Commission declared the Venice Canal System a Los Angeles City Historic-Cultural Monument (HCM No. 270, August 2, 1983).
- •Maximum Building Height 22-30 feet. Height: Not to exceed 22 feet for any portion within 10 feet from the canal property line. Thereafter, an ascending height equal to one half the horizontal depth from this 10-foot line with a maximum height of 30 feet. Roof access structures shall be set back at least 60 horizontal feet from the mean high tide line of the fronting canal.
- •An open, permeable yard of at least 450 square feet for a 30 foot wide lot, and at least 600 square feet for a 40-foot wide lot, shall be maintained between the canal property line and the front of any structure. A minimum 10-foot front yard setback, with a required 15 foot setback average, shall provide the required permeable front yard area. No fill nor building extensions, including stairs and balconies, shall be placed in or over the required permeable front yard area with the exception of 42-inch high fences or permeable decks at grade (no more than 18" high).
- •Ensure that the character and scale of existing single-family neighborhoods is maintained and allow for infill development provided that it is compatible with and maintains the density, character and scale of the existing development.
- •Views of Natural and Coastal Recreation Resources. The scale of development shall comply with height limits, setbacks and standards for building massing specified in Policy Groups I.A and I.B, Residential and Commercial Land Use and Development Standards of this LUP, in order to protect public views of highly scenic coastal areas and vista points, including, but not limited to, the canals...

- •It is the policy of the City to provide increased parking opportunities for both visitors and residents of Venice, and improve summer weekend conditions with respect to Venice Beach parking and traffic control.
- •Parking facilities shall be increased, subject to the availability of funding, to meet existing unmet needs for residents and beach visitors in order to improve public access opportunities and reduce conflicts between residential and beach visitor parking.
- •Expansion of Public Beach Parking Supply. The construction of new public parking facilities should be implemented, as well as maximizing the use of existing ones by restriping existing parking lots or converting them to multi-level structures where consistent with other Coastal Act policies.
- •The established Venice Coastal Parking Impact Trust Fund, into which in lieu parking fees shall be paid, will continue to be utilized for expenditure on improvement and development of public parking facilities that improve public access to the Venice Coastal Zone as specified in the LUP.
- c. Where feasible and compatible with the surrounding neighborhood, recreational uses shall be located in conjunction with other new public facilities, such as public parking lots.
- d. Recreation facilities shall be refurbished and constructed to maximize recreational opportunities.
- •The City shall designate and zone public recreation areas shown on Exhibits 20a and 20b, including Ocean Front Walk, as Open Space use. The City shall maintain an inventory of vacant land suitable for potential acquisition as public open space, and shall encourage continuing efforts by County, State and Federal agencies to acquire such land and work with the Coastal Conservancy towards this end. Potential funding sources include: Quimby funds, the Tide-Lands Oil Trust Funds, and the Venice Surplus Real Property Fund. Unutilized or underutilized public land (including rights-of way), particularly publicly-owned lands having potential for multiple uses, such as school playgrounds, should be made available for park and recreational uses. (Emphasis added. 20b includes the public boat launch.)
- •A public boat launch facility was built as part of the Venice Canals Rehabilitation Project at the Grand Canal and North Venice Boulevard. The City shall protect the public's ability to access the canals by boat by maintaining public access to the Grand Canal public boat launch. The facility shall provide adequate on-site public parking consistent with the sizes and types of boats to be launched and frequency of launching pursuant to the County Department of Small Craft Harbors standards.
- •Venice Canals Setback and Yard Area. In order to provide a setback for access, to protect visual quality and the biological productivity of the canals, and to limit water runoff, a setback with an average depth of 15 feet (and a minimum depth at any point of 10 feet) shall be provided and maintained in the front yard areas of private residences (adjacent to the canal property line). This setback shall provide a permeable

yard with an area at least 15 feet times the width of the lot line at the canal side.

•Canal Zoning. The canal waterways are rezoned Open Space (OS). This zoning designation serves to protect the recreational, residential and scenic uses of this coastal area while providing for other uses which would benefit the public without significant impairment of the recreational and residential uses.

50. The Reese Davidson project would demolish 4 Units of Low-Cost Housing to build a restaurant, retail space and a large meeting room to be used to promote the activities of the Developer.

The Reese Davidson project would demolish 4 units of low-cost housing in which the tenants have lived in for an average of more than 25 years. One tenant has lived there for 39 years, another for 30 years. The other two tenants have both lived there for 17 years. One of these families has three children, one with special needs, who have lived there their entire lives. At least 3 out of the 4 households include seniors or disabled people. (Exhibit 32)

It would have been easy to build around these existing low-cost units. The developer found the space to build their office, a restaurant and retail space for rental income along with a 3155 square foot meeting room that they call an "Art Studio" that will be used to promote their business, but did not have room for these families to stay in their homes.

The affordability restrictions at the Reese Davidson development will be in place for 55 years of the 99 year lease term, with rent going to market value when the affordibility restrictions end. (Exhibit 23.1 CAO Report 6-03-22) Assuming the retrictions end in 55 years, some of the original tenants could be forced out to turn these units into luxury apartments for the benefit of wealthy investors. Unless the lease term is changed to match the term of the affordibility restrictions, this Open Space publicly owned land will wind up as luxury apartments generating profits for private investors.

51. This development next to the beach would be the most expensive low-cost housing units ever built in the United States costing well over a million dollars each.

The Reese Davidson development was originally supposed to cost \$304,000 per unit. The most recent estimate from the developers was \$535,000 per unit, which average 460 square feet.

The developers are intentionally understating the cost per unit by failing to include land cost, cost to build the replacement parking garage, debt service on the new parking garage, lost profits from parking during construction and increased cost to operate the parking garage during the 99 year lease period.

According to the City's MICLA Bond request, the public parking garage is currently budgeted at \$19,492.862. Almost all of this amount will be paid by beach visitors in the form of higher parking fees. The cost was previously estimated to be 5.2 million dollars. (Exhibit: PDG Parking Proposal Page 18)

According to the developer's financial projections, the new parking garage would cost about five times as much to operate compared to the existing parking lot. (\$929,00 per year vs about \$172,000 now)

The land alone might be worth over 100 million dollars as a recent property listing for 1410-1422 Main Street, a much less desirable location, was priced at 38 million dollars per acre.

Including land cost, these 460 square foot units across the street from the beach are going wind up costing well over a million dollars each. Supply chain problems, inflation and the skyrocketing cost of labor in construction will drive the price much higher again.

Los Angeles Hotel rooms sold for a median price of \$107,863 in the first 6 months of 2019 and \$153,576 in 2021. The County of Los Angeles and others have been buying and renovating hotels for \$100,000 to \$200,000+ per unit. The City Controller has recommended that money be diverted away from expensive projects like this to be spent on lower cost projects that can be built much faster and with more impact. The primary beneficiaries of this development would be the developers and their vendors who stand to make millions of dollars, not homeless people and low-income residents who would benefit a lot more from more cost effective spending.

52. The only way to maximize coastal access in to comply with the Coastal Act the Venice Median would include simple changes and much lower prices in the existing parking lots.

There are 3 separate low-cost coastal visitor facilities authorized by Coastal Development permits on the site of the proposed Reese Davidson Development: (1) Beach Parking Lot #731 (2) Public Boat Launch and parking lot and (3) Bikeway. As documented in this study, the City of Los Angeles has tried to block, discourage and prevent use of all three of these facilities. The plans for the Reese Davidson development would further diminish coastal access. The development would demolish the bikeway and most of the boat launch facility with no replacement. It would replace a very low cost and functional parking lot with a very high cost totally dysfuntional garage that would not able to provide adequate access for beach visitors and boaters.

Under Section 30210 of the California Coastal Act, the Commission is required to "Maximize" coastal access for "all the people." Maximize means to "make as large or great as possible."

"Among the most important goals and requirements of the Coastal Act is the mandate to protect, provide, enhance, and maximize public recreational access opportunities to and along the coast, consistent with strong resource conservation principles. Within this guiding framework, the protection of and priority for lower cost visitor and recreational facilities is explicitly identified. Further, the Coastal Act Section 30210 direction to

maximize access represents a different threshold than to simply provide or protect such access and is fundamentally different from other like provisions in this respect. In other words, it is not enough to simply provide access to and along the coast, and not enough to simply protect access, rather such access must also be maximized. This terminology distinguishes the Coastal Act in certain respects and provides fundamental direction with respect to projects along the California coast that raise public access issues..." California Coastal Commission (emphasis added)

Instead of expanding access as required by Section 30210, the Reese Davidson development would restrict, diminish, minimize and block coastal access using cars, bikes and boats in a manner that would most effect low-income, elderly, disabled disadvantaged visitors.

The only option to maximize coastal access to comply with the Coastal Act in the Venice Median would be to preserve and improve the existing parking lots and coastal facilities, and to:

- •Lower the prices at all five of the City owned beach parking lots in Venice to make them competitive and affordable to as many people as possible.
- •Eliminate the artificial restrictions at the entrances to Lot #731 and #701 and implement new improved systems to maximize their utilization.
- •Restripe the existing Median parking lots to increase the number of spaces as called for in the Venice Local Coastal Program Land Use Plan.
- •Open the gate to the public boat launch during daytime hours to comply with the Coastal Development Permit.
- •Post signs for the Public Boat launch to let the public know that it is available for their use.
- •Keep Lot #701 Open every day to comply with the existing Coastal Development Permit and to expand access to low-income and disadvantaged groups.
- •Improve the existing Bikeway by widening it, adding a walkway for pedestrians and providing signage.
- •Place signs in strategic locations adjoing the three mile beach showing prices lower than the private parking lots to direct visitors to the public lots and encourage the private lots to lower their prices. (For westbound traffic on Washington Blvd and Venice Blvd and on Pacific Ave.)
- •Place signs on South Venice Blvd well before Pacific Ave to let people turned away from the parking lots on the beach know that parking is available in the Median and how to get there.
- •Install pay stations at Lot #701 to expand hours and provide for payment by credit cards.

- •Replace the after hours paybox at Lot #731 with a system that is not confusing and works for all of the parking spaces.
- •Enforce laws that require private parking lots to post prices.
- •Take steps to prevent prevent people from diverting cars away from the entrances at the publicly owned parking lots to more expensive private lots.
- •Set up systems to direct vehicles from all three of the lots on the beach to the Venice Median when they are full and there are still spaces available in the Median.
- •Establish and promote low-cost permit parking programs to promote equitable beach access for low-income and disadvantage groups.
- •Venice Beach and the Historic Canals are two of the Crown Jewels of the City of Los Angeles that every child in our City should experience. Programs should be established so that visits to the beach and canals are part of the common experience of growing up for every child in our city to help bring us together.
- •Implement new systems for getting vehicles into all five of the City owned beach parking lots in Venice to shorten the waits and lines, improve utilization and increase revenue.
- •Restore the landscaping in both median parking.
- •Improve the restrooms and other facilities at Venice Beach to address online complaints and to provide a better experience for visitors.
- •Develop systems and plans for maximizing access to the canals for recreational boating using the boat launch, including plans for parking boat trailers at Lot #731. (These plans will have to be revised periodically based upon experience and as demand continues to grow.)
- •Design and implement a modern wayfinding system for the entire 3 miles beach in Venice after studying the impact of the changes listed above on traffic patterns. To improve coastal access, the system should direct visitors to the least expensive available parking option and include prices to prevent them from being diverted to parking lots with exploitive prices. (Note: The Wayfinding system proposed as part of the Reese Davidson Development would be very ineffective in solving the problems discussed in this study as it does not include pricing or direct visitors to the locations that have parking.)
- •The Reese Davidson development would remove the padlocks on the existing gates under the Short Line Bridge to provide access from the sidewalk on South Venice Blvd to the Grand Canal. This is probably a bad idea for reasons of safety and security. The City and the Coastal Commission should review the safety and feasibility of this plan, which could be implemented by removing the padlocks on the gates at the existing parking lot.

•Study the best use for the Pacific Electric Railway right of way that runs from the Center of Los Angeles to Venice beach for possible use for light rail or as a bikeway across the City.

It would be impossible to conduct a valid parking study of the short and long term parking demand until all of these problems have been fixed an the people turned away by the City's long standing practices have had time to return. At some later date, the City will have to revisit the short and long term options for using the median parking lot properties to add additional parking structures and/or add new options for coastal access including light rail.

To undo some of the damage done by the its illegal efforts to block and discourage coastal access in Venice, the City of Los Angeles Los Angeles should be required to fix the problems discussed in this report and to pay for a publicity program to get some of the people turned away from the beach parking lots and public boat launch to return. The publicity should include a focus on low-income residents and disadvantaged groups who were most impacted by the City's Violations of the California Coastal Act and its own policies for equitable access to public facilities.

"Not everyone can afford to take their family to Disneyland but they should always be able to easily and safely bring their family to our multi-cultural beach" Letter from Sonya Reese Greenland to the developers demanding that they remove her Grandfather's name from the development.

(Exhibit 31 Sonya Reese Greenland Letter)

Evan Hines, son of Gregory Hines, has also asked the developers to remove his father's name from the development.

Seifert, Chloe@Coastal

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 11:59 AM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report



 $\textbf{Krysten Tomaier} \mid \mathsf{Coastal\ Program\ Analyst}$

CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E. Ocean Blvd, Suite 300 Long Beach, CA 90802 (562) 590-5071



If you need to submit an appeal or an emergency application, please email a supervisor and copy: SouthCoast@coastal.ca.gov.

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From: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>

Sent: Friday, September 2, 2022 11:48 AM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: FW: Public Comment on September 2022 Agenda Item Wednesday 15 - Deputy Director's Report

Hi Simone!

Please see below for public comment for the LA area.

Have a nice day!

Thank you,

Adríana Palato
Management Services Technician
California Coastal Commission
7575 Metropolitan Drive #103
San Diego, CA 92108#

From: Lanore < lanore < lanorelarson@gmail.com>
Sent: Friday, September 2, 2022 10:49 AM

Dear Commissioners-

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the pubic's best interest in mind.

Thank you for your consideration,

Lanore Larson

Seifert, Chloe@Coastal

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 3:59 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Chloe Seifert | Coastal Program Analyst CALIFORNIA COASTAL COMMISSION South Coast District Office 301 E. Ocean Blvd, Suite 300 Long Beach, CA 90802 (562) 590-5071

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----Original Message-----

From: Renee Kaplan <reneekaplan@yahoo.com>

Sent: Friday, September 2, 2022 3:58 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners:

I strongly support the motion before the Coastal Commission to extend the deadline for Commission action for up to one year to consider the City of Los Angeles's request to amend the Venice Land Use Plan to modify development standards for a 40 lot mixed-use project one block from the beach on the Venice Canals.

I am a resident who lives within 500 feet of this proposed project and am extremely concerned about the environmental issues that have been exposed and now should be studied. The City and developers have bypassed environmental review using state legislation that should probably not have been passed and certainly not applied to this project in such an environmentally sensitive area as the Venice Canals. We ask now that the Coastal Commission protect both the coast and its residents from this misguided project.

Thank you for considering this and for doing your best to protect the coast, first and foremost.

Sincerely, Renee Kaplan 229 Carroll Canal Venice, CA 90291

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 4:00 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

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Chloe Seifert | Coastal Program Analyst

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From: Safe Coastal Development <safecoastaldevelopment@gmail.com>

Sent: Friday, September 2, 2022 3:42 PM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners,

The Coalition for Safe Coastal Development and its members support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

We are extremely concerned with the land use entitlements and lack of environmental review that will cause irreparable harm to our coastal community. In the six years we've been calling attention to the inherent flaws of the project and site choice, the developers and the City have turned a blind eye to the many environmental issues involved in building such a massive project, on this infeasible site in the dual coastal zone.

The City's own Notice of Preparation called attention to the many potential significant impacts of the project back in 2018 in it's initial environmental study. Since this time we have been requesting accountability in properly addressing these issues.

From the City's own initial environmental study in August, 2018, performed by Eyestone Environmental for The City of Los Angeles Department of City Planning:

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: aesthetics; air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation/circulation; tribal cultural resources; and utilities (water, wastewater, and energy). As a result, these potential effects will be analyzed further in the EIR.

These are the issues that must be fully evaluated in whatever time it takes. We are grateful to the commission for picking up the ball where the developers and the city have brazenly dropped it.

Thank you for continuing to protect this sensitive coastal environment and the safety of residents and visitors who enjoy the California Coast.

Sincerely,

Coalition for Safe Coastal Development

https://www.safecoastaldevelopment.org

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 4:01 PM

To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

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From: Tracy Carpenter <tracycarpenter@me.com>

Sent: Friday, September 2, 2022 2:13 PM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

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Sincerely,

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To: Seifert, Chloe@Coastal

Subject: FW: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

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To: SouthCoast@Coastal.ca.gov>

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https://www.safecoastaldevelopment.org

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To: Seifert, Chloe@Coastal

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To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

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Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Tracy Carpenter Venice Resident

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 6:18 PM

To: Seifert, Chloe@Coastal

Subject: Fwd: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Follow Up Flag: Flag for follow up

Flag Status: Flagged

Sent from my T-Mobile 5G Device Get Outlook for Android

From: David Blocker <dblocker01@gmail.com> Sent: Friday, September 2, 2022 4:48:12 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners -

Please extend the deadline for the commission action on the project adjacent to the Venice Canals. This project needs further reviewed. From the outset this project pressing forward without alternate options or concerns about building in a flood plane and restricting use of the beach have alarmed me. It seems reckless and without thorough review. I have lived in the canals for 30 years and am not against construction and progress (even when new construction dwarfs my home) but I feel that this project is deeply flawed and want the Coastal Commission to review. Please allow them to do their work and feel free to call on me with any questions. Thank you.

Sincerely, David Blocker 240 Carroll Canal Venice, CA. 90291 tel: 310-902-2663

Citizens Preserving Venice

September 2, 2022

Th15a

Venice Median Project, Venice LCP-5-VEN-22-0038-1 SUPPORT STAFF recommendation

Honorable Commissioners and Staff,

We are writing to strongly support an extension of time for Staff's review of the certified Venice Land Use Plan (LUP) amendments related to the Venice median project.

As noted in our appeal of the project, we have found numerous errors in the City's proposed amendments. But mainly, the requested amendments are a bridge too far. It is impossible to conclude that the proposed changes comply with the Coastal Act; for example, the LUP does not allow lot consolidations adjacent to the Venice Canals and yet this would be a 40 lot consolidation. In addition, the proposed LUP changes result in a decrease in environmental protections and recreational opportunities for the Venice Canals area and a significant decrease in access to both the Venice Canals and the beach area, all of which violates the Coastal Act.

This project as proposed is infeasible and has innumerable significant violations of the standard of review. We ask that Staff not expend resources advising the City and applicants on the manner in which the proposed development might be made consistent with the Coastal Act Chapter 3 policies. Not only would that be a violation of Coastal Act section 30335.1, it would be a significant waste of government resources given the number of areas where this project has potential serious environmental issues and feasibility appears unlikely.

We are immensely grateful for the outstanding work by Staff on this project to date, including work on the appeal by the Executive Director and the work done in analyzing the state permit application as summarized in the Notice of Incomplete Application.

Sincerely,

Sue Kaplan Sue Kaplan, President Citizens Preserving Venice

From: SouthCoast@Coastal

Sent: Friday, September 2, 2022 6:18 PM

To: Seifert, Chloe@Coastal

Subject: Fwd: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP

Amendment No. LCP-5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing

Project). Time Extension

Sent from my T-Mobile 5G Device Get Outlook for Android

From: Debra DB <debrablocker@gmail.com> **Sent:** Friday, September 2, 2022 4:49:04 PM

To: SouthCoast@Coastal < SouthCoast@coastal.ca.gov>

Subject: Public Comment on September 2022 Agenda Item Thursday 15a - City of Los Angeles LCP Amendment No. LCP-

5-VEN-22-0038-1 for the Venice segment (Venice Dell Community Housing Project). Time Extension

Dear Commissioners-

I moved to the Venice area 15 years ago. It was a sketchy area then to say the least, but we stuck it out and have tried to be good neighbors and active Venice supporters for all these wonderful Venice years.

About 7-10 years ago, I went to a meeting held at the Westminster School auditorium for Venice community members, sponsored by the City of LA. They had hired a consulting firm to do some outreach to the residents of Venice, letting us know, above all, that we were in a flood Zone, and that rising water levels are coming. The gist of the meeting was, "it's going to come so you'd better understand that the city can't afford to do anything much financially about it. Get ready, be prepared, and do you have any suggestions for us." This is an issue for us all to deal with, but the idea of putting the Venice Dell project in the middle of the only open space in our area, would be obviously a bad idea for many reasons. #1, Why would the city develop this project which is set to cost more that \$70 million dollars when it's all said and done (more or less) in an area that is a known flood zone. On top of that, they are planning to do some subterranean digging, I watched a new house construction right next to me on the Canals, desiring to be situated below ground level, spend a year and a half, just trying to mitigate the existing low water table issue we have here in Venice. This cost them an unbelievable amount of unforeseen expense of time and money, and just seems like a bad idea all around. I feel for them at the next big rain when the streets near me are prone to slow water run off already.

With the water table level in Venice becoming higher and higher, and with the knowledge that it is a matter of **when not if** a flood hits, it just doesn't' make sense to place a multi-million dollar new

investment in this fragile area. Not to mention, when a flood hits, the Venice Dell project will only serve to intensify the lack of area for water run-off. Plus, it has always been my understanding that this open space would be used as an emergency triage area for all of Venice.

I strongly support the motion to extend the deadline for Commission action for up to a year on the City of LA request to amend the Venice Land Use Plan to modify development standards for a 40-lot mixed-use project one block from the beach on the Venice Canals.

Numerous environmental issues have been exposed and are of extreme concern to the community and now must be fully studied. The City has bypassed environmental review using misguided legislation and we rely on the Coastal Commission to fulfill its obligation to protect the Coast, its residents and its visitors from reckless development.

Thank you for your due diligence in protecting the Coast and the people who share it from politicians who do not have the public's best interest in mind.

Sincerely,

Debra Blocker 240 Carroll Canal Venice, CA 90291 debrablocker@aol.com