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W11a

November 25, 2024

TO: Commissioners and Interested Persons

FROM: Steve Hudson, Deputy Director
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SUBJECT: Amendment Request No. LCP-5-VEN-23-0037-1 to the Venice Certified Land Use Plan, for Public Hearing and Commission Action at the December 11, 2024 hearing.

SUMMARY OF LCP AMENDMENT REQUEST NO. LCP-5-VEN-23-0037-1

The City requests to amend the certified Venice Land Use Plan (LUP) to create a new subarea with modified development standards for 40 lots (2.65 total acres) located between Dell Avenue, Pacific Avenue, North Venice Boulevard, and South Venice Boulevard in Venice, City of Los Angeles, Los Angeles County ([Exhibit 1](#)). The project site is currently developed with two public City-owned surface parking lots, a quadraplex, and a public boat launch ramp and parking lot for non-motorized boating access to the Venice Canal System via Grand Canal.

The project-specific amendment request is intended to enable Commission approval of the Venice Dell Community Housing Project ("Venice Dell Project") on the Venice Median. The Venice Dell Project includes three primary project components: A) consolidation of 40 lots and subdivision into two ground lots and seven airspace lots; B) demolition of the existing surface parking lots and quadraplex; and C) construction of two new, 35-ft. tall, four-story, mixed-use structures with 120 affordable housing units, 1,735 sq. ft. of retail, 1,669 sq. ft. of supportive services, and 349 total parking spaces distributed between two main structures. Of the 349 total parking spaces, 223 spaces would serve the general public, eight spaces would serve boat launch ramp access, and 55 spaces would serve residents. More detail on the project can be found in the combined staff report for Appeal No. A-5-VEN-22-0042 and Coastal Development Permit (CDP) Application No. 5-22-0588.

The City's amendment request would add a new subarea, Subarea A, with boundaries aligning with those of the project site to the Venice coastal zone. The 40 lots comprising Subarea A would be re-designated from 'Open Space' and 'Low Medium II Residential' to

'Neighborhood Commercial' use; and new development standards specific to Subarea A would be added to those of the existing Neighborhood Commercial land use ([Exhibit 2](#)). The proposed development standards would increase the allowable residential density, height, and scope of land uses in Subarea A. The City's amendment request also adds new definitions and development incentives for varying forms of supportive housing.

The Commission received LUP Amendment Request No. LCP-5-VEN-22-0038-1 on July 8, 2022; filed the application status as complete on July 28, 2022; and approved a one-year time extension on September 8, 2022. Because the associated CDP application for the Venice Dell project was not filed as complete or ready to schedule for Commission action, Commission staff requested the City withdraw and resubmit the LUP amendment request to allow resolution of outstanding information requirements associated with the CDP application. The resubmittal was assigned LUP Amendment Request No. LCP-5-VEN-23-0037-1. The subject LUP amendment and the CDP application were filed as complete on November 25, 2024. As such, the Commission must act on the subject LUP amendment by February 25, 2025.

The Coastal Commission certified the Venice LUP on June 14, 2001, but the City does not yet have a certified Implementation Plan. As such, the City does not have a certified Local Coastal Program (LCP). Thus, the standard of review for this LUP amendment request is Chapter 3 of the Coastal Act.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends that the Commission certify LUP Amendment Request No. LCP-5-VEN-23-0037-1 with suggested modifications. The suggested modifications are necessary to correct some typographical errors and outdated language; more accurately reflect the associated Venice Dell Project; and preserve public access and community character. The two motions and resolutions to carry out the staff recommendation are on **page 6**. The suggested modifications to the LCP amendment request are included under [Section III](#) of this staff report.

Therefore, staff recommends that the Commission, after public hearing:

- 1. Deny the LUP amendment request as submitted; and,**
- 2. Certify, only if modified, the LUP amendment request.**

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EXHIBITS

[Exhibit 1 – Subarea A Vicinity Map](#)

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[Exhibit 3 – Resolution](#)

[Exhibit 4 – Ordinance No. 187551](#)

I. PROCEDURES

A. STANDARD OF REVIEW

Section 30512 of the Coastal Act outlines the standard of review for an LUP amendment request. The subject section requires the Commission to certify an LUP amendment if it finds that the amendment meets the requirements of Chapter 3 of the Coastal Act. Specifically, Section 30512(c) states:

The Commission shall certify a land use plan, or any amendments thereto, if it finds that a land use plan meets the requirements of, and is in conformity with, the policies of Chapter 3 (commencing with Section 30200). Except as provided in paragraph (1) of subdivision (a), a decision to certify shall require a majority vote of the appointed membership of the Commission.

Pursuant to Section 30512 of the Coastal Act, the Commission shall take action by a majority vote of the Commissioners present.

B. LOCAL REVIEW AND DEADLINE FOR COMMISSION ACTION

Section 30503 of the Coastal Act requires public input in Local Coastal Program development. It states:

During the preparation, approval, certification, and amendment of any local coastal program, the public, as well as all affected governmental agencies, including special districts, shall be provided maximum opportunities to participate. Prior to submission of a local coastal program for approval, local governments shall hold a public hearing or hearings on that portion of the program which has not been subjected to public hearings within four years of such submission.

The City of Los Angeles Planning Commission, City Council, and Planning & Land Use Management Committee held public hearings on the proposed LUP amendment as summarized below. (The below summary includes references to the City's approved CDP and Vesting Tentative Tract Map for the Venice Dell Project because these items were heard in conjunction with the subject LUP amendment request.)

On February 2, 2021, the Deputy Advisory Agency approved Vesting Tentative Tract Map No. VTT-82288 for the Venice Dell Community Project and determined the project exempt from CEQA review. On February 16, 2021, Venice Vision submitted a timely appeal of the Deputy Advisory Agency's determination to the City Planning Commission.

On May 26, 2021, the City Planning Commission denied the appeal and upheld approval of the vesting tentative tract map. At the hearing, the City Planning Commission also approved a project-specific amendment to the certified Venice LUP, uncertified Venice Community Plan, and uncertified Venice Coastal Zone Specific Plan. Concurrently, the City Planning Commission approved local CDP No. CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP for the Venice Dell Community Project. On July 13, 2021, the City Planning Commission's actions were published, and the local appeal period began.

On July 22, 2021, Venice Vision submitted a timely appeal of the City Planning Commission's action on the vesting tentative tract map to the City Council and Planning Land Use Management Committee. On August 2, 2021, Venice Vision submitted a second timely appeal of the City Planning Commission's action on the project-specific amendment and local CDP. On October 28, 2021, the City Planning Department published a recommendation that the City Council and Planning Land Use Management Committee deny the subject appeals. At the hearing, the City Planning Department also recommended revision to correct errors in the conditions of approval for the local CDP.

On November 9, 2021, the Planning Land Use Management Committee waived consideration of: 1) the vesting tentative tract map; 2) amendments to the Venice Community Plan, Venice Coastal Zone Specific Plan, certified Venice LUP; and 3) the local CDP. On November 23, 2021, the City Planning Department published a second recommendation identical to the findings published on October 28, 2021, but eliminated all references to the Planning Land Use Management Committee.

On December 1, 2021, the City Council denied the appeals filed by Venice Vision in July 2021 and August 2021. The City Council also upheld approval of: 1) the vesting tentative tract map; 2) amendments to the Venice Community Plan, Venice Coastal Zone Specific Plan, certified Venice LUP; and 3) the local CDP No. CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP [\(Exhibit 3\)](#).

On February 3, 2022, the City Council rescinded its resolution adopted on December 1, 2021 and approved a revised amendment to the uncertified Venice Community Plan and certified Venice LUP, reflecting the factual corrections previously recommended by the City Planning Department. On February 24, 2022, the City Planning Commission also rescinded its resolution (previously adopted on May 26, 2021) and approved a revised amendment to the uncertified Venice General Plan and certified Venice Land Use Plan.

On June 14, 2022, the Planning and Land Use Management Committee also published findings recommending approval of a revised amendment to the uncertified Venice General Plan and certified Venice LUP. (This was published despite the Planning and Land use Management Committee's previous waiver of application consideration.) On June 17, 2022, the City Council adopted the Planning and Land Use Management Committee's report.

On June 14, 2022, the City Council passed Ordinance No. 187551 for the corrected resolution [\(Exhibit 4\)](#). On July 6, 2022, the ordinance was published and posted in accordance with City Council policy. On August 6, 2022, the ordinance was rendered effective.

On July 8, 2022, the City of Los Angeles submitted Venice LUP Amendment No. LCP-5-VEN-22-0038-1. The proposed LUP amendment was found to be in proper order and legally adequate to comply with the submittal requirements of Section 30510 of the Coastal Act and Section 13553 of the California Code of Regulations (Title 14). Pursuant to Section 30512 of the Coastal Act, an LUP amendment must be scheduled for a public hearing and the Commission must take action within 90 days of a complete submittal. The 90th day after the City's filing of the complete submittal was initially November 15, 2022. To allow additional time for resolution of information requirements for the associated Venice Dell

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Project, Commission extended the deadline for action on the LUP amendment request by one year on September 8, 2022.

However, the one-year extension did not provide adequate time for resolution of the information necessary to complete the associated CDP application. At Commission staff's request, the City withdrew and resubmitted the LUP amendment request to allow resolution of outstanding information requirements associated with the Venice Dell Project. The resubmittal was assigned LUP Amendment Request No. LCP-5-VEN-23-0037-1. The subject LUP amendment and the CDP application were filed as complete on November 25, 2024. As such, the Commission must act on the subject LUP amendment by February 25, 2025.

For Additional Information

The file is available for review at the South Coast District office located at 301 East Ocean Boulevard, Suite 300, Long Beach, CA 90802. The staff report can be viewed on the Commission's website: <http://www.coastal.ca.gov/mtgcurr.html>. For additional information, please contact Chloe Seifert at venicedell@coastal.ca.gov.

II. MOTIONS AND RESOLUTIONS

A. DENIAL OF LUP AMENDMENT AS SUBMITTED

Motion I: I move that the Commission **certify** Land Use Plan Amendment No. LCP-5-VEN-23-0037-1 as submitted by City of Los Angeles.

Staff recommends a **NO** vote. Passage of this motion will result in rejection of Land Use Plan Amendment and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Resolution to Deny as Submitted: The Commission hereby denies certification of Land Use Plan Amendment LCP-5-VEN-23-0037-1 as submitted by the City of Los Angeles and adopts the findings set forth below on the grounds that the amendment does not conform with the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or mitigation measures which could substantially lessen any significant adverse impact which the Land Use Plan Amendment may have on the environment.

B. APPROVAL OF LUP AMENDMENT WITH SUGGESTED MODIFICATIONS

Motion II: I move that the Commission **certify** Land Use Plan Amendment No. LCP-5-VEN-23-0037-1 to the Venice certified LUP if modified in conformance with the suggested changes recommended by staff.

Staff recommends a **YES** vote. Passage of this motion will result in certification of the Amendment to the Land Use Plan with suggested modifications and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Resolution to Certify if Modified: The Commission hereby certifies Venice Land Use Plan Amendment No. LCP-5-VEN-23-0037-1 if modified as suggested and adopts the findings set forth below on the grounds that the Land Use Plan amendment with suggested modifications will meet the requirements of and be in conformity with the policies of Chapter 3 of the Coastal Act. Certification of the land use plan amendment if modified as suggested complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the Land Use Plan Amendment may have on the environment.

III. SUGGESTED MODIFICATIONS

For the following suggested modifications:

Language of the currently certified LUP is shown in plain text.

The City's proposed additions are shown in underline text.

The City's proposed deletions are shown in ~~strike out text~~.

The Commission's suggested additions are shown in **bold, underline text**.

The Commission's suggested deletions are shown in **~~bold, underline, strike out text~~**.

The following suggested modifications are necessary to carry out the Chapter 3 policies of the Coastal Act:

Suggested Modification 1: Update the former title of the Housing and Community Development Department.

Definitions, Qualified Permanent Supportive Housing Project.

The construction of, addition to, or remodeling of a building or buildings offering Supportive Housing; and where all of the total combined Dwelling Units or Guest Rooms, exclusive of any manager's units, are affordable. For the purposes of this subdivision, affordable means that rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income of Extremely Low, Very Low or Low-Income households, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD) or any successor agency, as verified by the ~~Housing & Community Investment Department (HCIDLA)~~ Los Angeles Housing Department (LAHD). A minimum of 50 percent of the total combined Dwelling Units or Guest Rooms is occupied by the Target Population.

Suggested Modification 2: Expand the scope of the definition to include populations with and without disabilities.

Definitions, Supportive Housing.

Supportive Housing. Housing with no limit on length of stay for persons with low incomes who ~~have one or more disabilities and~~ may include, among other

populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, **and** homeless people, **and those who have one or more disabilities**. The housing is linked to onsite or offsite Supportive Services, and any Floor Area used for Supportive Services shall be considered accessory to the residential use.

Suggested Modification 3: Resolve a potential conflict between the development standards of policies I.A.1 and I.B.6.

Residential Land Use and Development Standards, Policy I.A.1

The maximum densities, building heights and bulks for residential development in the Venice Coastal Zone shall be defined by the Land Use Plan Maps and Height Exhibits (Exhibits 9 through 16), and the corresponding land use categories and the development standards as described in this LUP. Refer to Policies II.C.10 for development standards for walk streets and to Policies II.A.3 and 4 for parking requirements. **Development within Subarea A is not subject to the provisions of Policy I.A.1 and shall comply with the standards outlined in Policy I.B.6.**

Suggested Modification 4: Update the former title of the Housing and Community Development Department and ensure affordability for the duration of the subject development's enjoyment of reduced LUP parking requirements.

~~Replacement of Affordable Housing, Policy I.A.18~~

Permanent Supportive Housing Projects that meet the definition of Qualified Permanent Supportive Housing Project and comply with the following requirements:

...

b. Affordable Housing Covenant. Projects shall record a covenant acceptable to **HCIDLA-LAHD** that reserves and maintains the total combined number of Dwelling Units and Guest Rooms designated as restricted affordable for **the life of the development unless otherwise limited as set forth in Government Code Section 65915.2, in which case, the restriction shall apply for** at least 55 years from the issuance of the Certificate of Occupancy.

c. Housing Replacement. Projects shall meet any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), or as thereafter amended, as verified by **HCIDLA LAHD**, and all applicable covenant and monitoring fees in Section 19.14 of this Code shall be paid by the applicant prior to the issuance of any building permit.

Suggested Modification 5: Remove references to the uncertified Health and Safety Code and add language clarifying the eligibility of reduced parking requirements.

~~Replacement of Affordable Housing, Policy I.A.19~~

Parking Requirements for Qualified Permanent Supportive Housing Projects and Supportive Housing. Reduced parking is permitted, as follows:

a. Supportive Housing ~~as defined in Health and Safety Code 50675.14(b)(2). Projects providing Supportive Housing and Qualified Permanent Supportive Housing Projects~~ may provide reduced parking consistent with Government Code Section 65915 **if the City determines that the reduced parking will not have any adverse effects on coastal resources. If the City determines that the requested incentive will have an adverse effect on coastal resources, the City shall consider all feasible alternative incentives and the effects of such incentives on coastal resources.**

Suggested Modification 6: Revise the land use designation for Subarea A from Neighborhood Commercial to Community Commercial to more appropriately describe the proposed project.

Neighborhood Commercial Areas, Policy I.B.5

Move the proposed language from Policy I.B.5 to Policy I.B.6.

Suggested Modification 7: Revise references to the Neighborhood Commercial land use designation; eliminate references to uncertified regulations and outdated project components; and protect the existing stock of on-street and off-street public parking.

Community Commercial Areas, Policy I.B.6

Neighborhood Community Commercial Area of Special Interest

ae. Subarea A (Exhibit 10b). The lots within Subarea A shall be developed with a Qualified Permanent Supportive Housing Project that meets the requirements of Policy I.A.18 and the following development standards. Qualified Permanent Supportive Housing Projects are not subject to the standards outlined in Policy I.B.7.

1. Density. No project shall exceed ~~the density permitted in the R3 zone~~ one unit per 800 square feet of lot area.

2. Use. Uses ~~allowed in the C2 zone or as~~ outlined in Policy ~~I.B.5~~ I.B.6.

3. Height.

i. All projects shall be limited to a maximum height of 35 feet.

ii. ~~One (1) campanile structure may exceed the maximum height of 35 feet. A maximum height of 67 feet is permitted, measured to the top of the Roof Access Structure.~~

4. Canal Setback.

i. An average setback of 15 feet, but not less than ten feet shall be maintained in the front yard adjacent to the property line which faces the canal.

ii. ~~An open, permeable yard with an area of at least 15 times the lot width and a minimum area of 450 square feet shall be maintained between the property line that faces the canal and the front of any structure, No fill nor building extensions, including stairs and balconies, shall be placed in or over the required permeable front yard area except fences up to 42 inches in height or permeable decks at grade level not more than 18 inches high A minimum total 11,266 square feet of permeable area shall be maintained throughout Subarea A in conjunction with a multi-path drainage system.~~

5. Access.

i. Driveways and vehicular access ~~to Venice Coastal Development Projects~~ shall be provided from North Venice and South Venice Boulevards, unless the Department of Transportation determines that it is not ~~F~~feasible. ~~New and e~~Existing curb cuts shall be ~~minimized,~~ removed when no longer necessary, and new curb cuts shall be prohibited to protect and maximize public onstreet parking opportunities.

ii. A minimum of 203 public parking spaces (including at least seven boat launch public parking spaces) shall be maintained in Subarea A.

6. Roof Access Structures. Building heights and bulks shall be controlled to preserve the nature and character of existing residential neighborhoods. Residential structures may have an enclosed stairway (roof access structure) to provide access to a roof provided that:

i. Up to nine (9) total roof access structures may be permitted for all development throughout Subarea A and shall be limited to a height of no more than ten (10) feet above the maximum height of the building;

ii. All roof access structures shall be set back at least 60 horizontal feet from the mean high tide line of Grand Canal and the inland side of the Esplanade (City right-of-way), except no more than four (4) roof access structures allowed within the 60-foot horizontal setback; and

iii. The roof access structures shall not exceed 100 square feet in individual area as measured from the outside walls.

7. Lot Consolidations. Consolidation and subdivision of up to 40 lots into two (2) lots for the construction of a mixed-use development with 100% affordable supportive housing, retail, parking associated with allowed development and public parking lots/garages may be permitted in Subarea A.

8. Qualified Permanent Supportive Housing Projects may provide reduced parking consistent with Government Code Section 65915 for all new affordable housing units. A minimum of 203 public parking spaces (including at least seven boat launch parking spaces) shall be maintained onsite for the life of the development.

Suggested Modification 8: Add language to allow Community Commercial uses adjacent to the canals in Subarea A.

Development Within Natural and Recreational Resource Areas/Protection of Views, Policy I.D.1

Canals and Ballona Lagoon Waterways.

Adjacent Use/Development: **Except for mixed-use development with 100% affordable supportive housing, retail, parking associated with allowed development and public parking lots/garages in Subarea A,** 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, **public access and recreation (including, but not limited to, public boat launch ramps with associated public parking)**, and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

Suggested Modification 9: Add language to reduce parking requirements for new development in Subarea A.

Parking, Policy II.A.3

Parking Requirements.

The parking requirements outlined in the following table shall apply to all new development, any addition and/or change of use. The public beach parking lots and the Venice Boulevard median parking lots shall not be used to satisfy the parking requirements of this policy. Extensive remodeling of an existing use or change of

use which does not conform to the parking requirements listed in the table shall be required to provide missing numbers of parking spaces or provide an in-lieu fee payment into the Venice Coastal Parking Impact Trust Fund for the existing deficiency. The Venice Coastal Parking Impact Trust Fund will be utilized for improvement and development of public parking facilities that improve public access to the Venice Coastal Zone. ...

Multiple dwelling and duplex on lots 40 feet or more in width, or 35 feet or more in width if adjacent to an alley

2 spaces for each dwelling unit; plus a minimum of 1 (one) guest parking space for each 4 (four) or fewer units (i.e. 2.25 spaces per unit; always round-up to highest whole number of spaces).

Exceptions: For projects where all required parking spaces are fully enclosed, any required guest spaces may be paid for at the same in lieu fee rate defined for BIZ parking. **100% affordable development in Subarea A is subject to the parking requirements of Policy I.A.13, I.A.14, and I.A.19.**

Suggested Modification 10: Add language to reduce Beach Impact Zone parking requirements for new development in Subarea A.

Parking, Policy II.A.4

Parking Requirements in the Beach Impact Zone.

Any new and/or any addition to commercial, industrial, and multiple-family residential development projects within the Beach Impact Zone shall provide additional (in addition to parking required by Policy II.A.3) parking spaces for public use or pay in-lieu fees into the Venice Coastal Parking Impact Trust Fund, **100% affordable development in Subarea A is subject to the parking requirements of Policy I.A.13, I.A.14, and I.A.19.**

Suggested Modification 11: Add language to allow the location of residential and commercial parking in Subarea A.

Parking, Policy II.A.9

Protection of Public Parking.

The following policies shall be implemented and enforced in order to protect and enhance public parking opportunities provided on public rights-of-way and in off-street parking areas:

- a. Beach Parking Lots. The beach parking lots located at Washington Boulevard, Venice Boulevard and Rose Avenue shall be protected for long-term (4-8 hours) public beach parking. No parking spaces in the beach parking lots shall be used to satisfy the parking requirements of Policies II.A.3 and II.A.4 **except in Subarea A, where residential/commercial**

parking may be allowed only as part of a 100% affordable residential/mixed use development provided that a minimum of 203 public parking spaces (including at least seven boat launch parking spaces) shall be maintained for public use on site. The temporary short-term lease or reservation of parking spaces in the beach parking lots may be permitted if the proposed temporary use of the parking supply does not conflict with the need for public parking by beach goers. Any proposal to allow overnight residential parking in the beach parking lots shall include provisions to enforce a prohibition against the storage of vehicles in the lots during the daylight hours by non-beach goers.

Suggested Modification 12: Add language to maintain public parking spaces for boat launch ramp access adjacent to the canal.

Coastal Waterways, Policy III.D.2

Boating Use of Canals and Lagoon.

Recreational boating use of the Venice Canals shall be limited to non-commercial shallow-bottom, non-motorized boats such as canoes and rafts, in order to permit recreation while protecting the environmentally sensitive habitat area and maintain a quiet ambience within the neighborhoods of the plan area. No boating shall be permitted in Ballona Lagoon and the portion of Grand Canal south of Washington Boulevard.

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 **and by providing at least seven public vehicle parking spaces located adjacent or in as close proximity to the boat launch ramp as feasible. The boat launch parking spaces shall include signage informing the public of available boat launch access, shall remain open to the public, and shall not be gated.** 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.

Suggested Modification 13: Revise exhibit to ensure preservation of the canal located in Subarea A as open space.

Land Use Plan (Map): North Venice, Venice Canals, **Subarea A**, Exhibit 10b

Re-designate the area located between Dell Avenue, North Venice Boulevard, South Venice Boulevard, and the Grand Canal as 'Community Commercial'.

Shift the "Canal St." caption north from the Grand Canal terminus to the street bounded by Mildred Avenue and North Venice Boulevard.

Designate the Grand Canal terminus located between North Venice Boulevard and South Venice Boulevard as 'Open Space'.

Add “Subarea A” to exhibit title and add a caption stating: “*All building heights shall be measured from the elevation of the fronting right-of-way Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.”

Suggested Modification 14: Correct typographical and mapping errors and remove references to the uncertified Los Angeles Municipal Code.

Subarea: North Venice, Venice Canals, **Subarea A**, Exhibit 14b

Shift “Canal St.” caption north from canal segment located between North and South Venice Boulevard, Pacific Avenue, and Dell Avenue to street bounded by Mildred Avenue and North Venice Boulevard.

Delete the “I: Subject to maximum regulation contained in LAMC” caption and replace with the caption: ‘I: 35’”

Extend the boundaries of “I: Subarea A” west to encompass the seven lots located between Strongs Drive and Pacific Avenue.

Suggested Modification 15: Revise exhibit to ensure preservation of existing public parking and provision of new public parking in Subarea A.

Coastal Access Map, Exhibit 17a

Designate the area located between Dell Avenue, North and South Venice Boulevard, and the Grand Canal as “Existing Public Parking” in red.

IV. FINDINGS

A. AMENDMENT DESCRIPTION AND BACKGROUND

The Commission certified the Venice LUP on June 14, 2001 and approved the City’s first LUP amendment request on April 10, 2002. The previous LUP Amendment No. 1-02 added policies for the “Open Space” and “Public Facility” land use designations and updated land use designations at ten specific locations to reflect existing uses. There have been no other amendments to the certified Venice LUP, although the City is currently working with Commission staff on a comprehensive update to the certified Venice LUP. The City intends to follow the update with an Implementation Plan for Venice, but, in the absence of a certified Implementation Plan, the City does not have a certified Venice LCP.

The City of Los Angeles’ request to amend the certified Venice LUP includes two primary categories of revision: 1) new designations and development standards for a 2.65-acre Subarea A and 2) new definitions and development incentives for all supporting housing projects in the Venice coastal zone.

Proposed Subarea A

The certified Venice LUP contains eight subareas, with the 2.65-acre subject area currently located within the North Venice subarea. Subarea A would carve the western-most portion of the Venice Median out of the North Venice subarea.

Subarea A would be bordered by two one-way streets, North and South Venice Boulevards, with the former roadway directing vehicles westward toward the ocean and the latter roadway directing vehicles eastward ([Exhibit 1](#)). Between the two streets spans the Venice Median, a roughly 0.5-mi. long strip of developed area spanning up to 195 ft. in width in some locations. Moving east to west, the Venice Median hosts a public park and library; two public parking lots managed by LADOT; and interspersed multi-unit complexes. It also hosts the terminus of Grand Canal and a public boat launch ramp.

The Venice Canal System extends through the western-most portion of the Venice Median and bisects the proposed Subarea A, with Grand Canal terminating at North Venice Boulevard. The Grand Canal Historic Bridge provides vehicle access across the canal. A public launch ramp for non-motorized recreational vessels, like kayaks and paddleboats, is accessible via a paved sidewalk and a paved public parking lot accommodating up to seven vehicles. The subject parking lot was intended to allow vehicles to load and unload boats directly from the launch ramp. Its varying availability to the public will be discussed further below.

Considering the proposed Subarea A more specifically, the subject area encompasses 40 lots (2.65 acres) located in the existing North Venice subarea. Two of the 40 subject lots are developed with an existing 18-ft. tall, two-story, 1,970 sq. ft. four-unit residential complex (i.e. a quadraplex). These two subject lots are designated as “Low Medium II Residential” in the certified LUP and zoned “C2, Commercial” in the uncertified Los Angeles Municipal Code (LAMC). The other 38 lots in the proposed Subarea A are developed with Lot 731, a 196-space surface parking lot owned and operated by LADOT. The parking lot is split by the Grand Canal with a bridge providing vehicular access between the two parking lots on either side of the canal. Lot 731 is located roughly 800 ft., or a five-minute walk, from the sandy Venice Beach. It is the largest of nine parking lots operated by LADOT in the Venice coastal zone. The 38 subject lots are designated as “Open Space” in the certified Venice LUP and zoned “C2, Commercial” in the uncertified LAMC.

The proposed Subarea A is intended to enable City and Commission approval of the Venice Dell Project on the subject 40 lots. The Venice Dell Project includes three primary project components: A) consolidation of 40 lots and subdivision into two ground lots and seven airspace lots; B) demolition of the existing surface parking lots and quadraplex; and C) construction of two new, 35-ft. tall, four-story, mixed-use structures with 120 affordable housing units, 1,735 sq. ft. of retail, 1,669 sq. ft. of supportive services, and 349 total parking spaces distributed between two main structures. Of the 349 total parking spaces, 223 spaces would serve the general public, eight spaces would serve boat launch ramp access and 55 spaces would serve residents. More detail on the project can be found in the combined staff report for Appeal No. A-5-VEN-22-0042 and CDP Application No. 5-22-0588.

The proposed LUP amendment request would re-designate the subject 40 lots as 'Neighborhood Commercial', which certified LUP Policy I.B.5 states is intended to accommodate "[s]mall scale neighborhood stores and community services... characterized by one and two story low-rise structures." The proposed amendment would add a new subsection to LUP Policy I.B.5 adding Subarea A as a "Neighborhood Commercial Area of Special Interest" ([Exhibit 2](#)). Development within the proposed Subarea A would be limited to "Qualified Permanent Supportive Housing Projects" (QPSH Projects) as discussed further below. QPSH Projects in Subarea A would be able to develop per the following unique development standards:

- The maximum density allowed in the uncertified LAMC's "R3, Multiple Residential" zone, which is currently one dwelling unit per 800 sq. ft. on lots at least 50-ft. wide and 5,000 sq. ft. in total size (with some specified exceptions¹);
- The allowable uses in the uncertified LAMC's "C2, Commercial" zone or certified LUP Policy I.B.5., both of which list small-scale commercial uses intended to serve residential neighborhoods and, solely in the case of the "C2" zone, residential uses;²
- A maximum 35-ft. height for both flat and varied rooflines, with the exception of a single maximum 67-ft. tall campanile structure allowed within Subarea A;
- A minimum average 15-ft. (but no less than 10-ft.) setback from the canal-facing property line, with an open permeable yard area equivalent in size to at least 15 times the lot width (but no less than 450 sq. ft.) sited in the subject setback; and
- With required vehicle access from North Venice Boulevard and South Venice Boulevard unless determined infeasible by LADOT, with new and existing curb cuts minimized to preserve public on-street parking.

The proposed amendment also includes revisions to certified LUP exhibits. Exhibits 2a and 2b would be revised to show the new Subarea A on the Venice Median. Exhibit 10b would be revised to designate all 40 lots within Subarea A as 'Neighborhood Commercial'. Exhibit 14b would be revised to allow heights "[s]ubject to maximum regulation contained in LAMC" in Subarea A (despite a 35-ft. maximum height with a 67-ft. tall campanile being listed in the proposed new LUP policy). Lastly, Exhibit 17a would revise the current 'Parking and Beach Impact Zone' designated in Subarea A from "Existing Public Parking" to simply "Beach Impact Zone".³

¹ Uncertified LAMC [Section 12.10](#), "R3" MULTIPLE DWELLING ZONE

² Uncertified LAMC [Section 12.14](#), "C2" COMMERCIAL ZONE

["Generalized Summary of Zoning Designations"](#), City Planning Department, 2024

³ "Beach Impact Zone (BIZ)" is only regionally defined in the certified LUP. But it generally encompasses the LUP subareas located near the beach-front, where private development's parking demand could impact an already-limited stock of public beach parking unless additional off-street spaces are required.

Proposed Incentives for Supportive Housing

The proposed amendment would also add new definitions to the certified LUP regarding supportive housing. State law generally defines supportive housing as housing with: A) no limits on length of stay, B) occupants constituting the target population, and C) onsite or offsite supportive services. The target population is defined by state law as inclusive of persons with disabilities and/or experiencing homelessness, while supportive services are generally defined as housing with “intensive case management” available to support the health, employment, and future housing prospects of residents.⁴ The City’s amendment request would add each of these definitions (i.e. supportive housing, target population, and supportive services) to the certified LUP’s definition list using language mirroring that of state law.

The proposed amendment would also define QPSH Projects. The subject term is not defined in state law, originating instead from a development incentive program of the uncertified LAMC.⁵ The LAMC generally defines a QPSH Project as any housing project that: A) is located in a multi-family residential zone, B) provides solely affordable units with the exception of manager units, and C) ensures at least 50% of the total units are occupied by the target population as defined by state law. The LAMC offers less restrictive development standards for QPSH Projects, consistent with state density bonus law,⁶ including, but not limited to, density, floor-to-area ratios (FARs), and height bonuses. These unique development standards are intended to incentivize the provision of more supportive housing throughout the City of Los Angeles (and in the case of state density bonus law, across California).

The City’s amendment request would add QPSH Projects to the certified LUP’s definition list with language mirroring that of the LAMC. The amendment would also add two new LUP policies related to QPSH Project eligibility criteria and development incentives:

- Proposed Policy I.A.18 would require applicants to provide documentation of supportive services and a minimum 55-year affordability covenant, as well as replace any existing dwelling units per the requirements Government Code Section 65915(c)(3).⁷
- Proposed Policy I.A.19 would allow reduced parking requirements consistent with state housing laws, including density bonus law as referenced in the certified LUP, which outlines an extensive set of parking ratios based on the percentage of total units restricted as affordable, the type of affordable housing, the level of affordability, and the proximity to a major transit stop.

The proposed Policy I.A.19 would not create a series of new parking reductions, as such reductions are already included in the certified LUP; the City is seeking to amend the LUP to reflect that supportive housing is an included type of affordable housing. The proposed

⁴ CA Gov. Code [Section 65650](#) defines ‘supportive housing’ and ‘target population’ by reference to Health and Safety Code [Section 50675.14](#) (although the definition of ‘supportive housing’ is now in CA Gov. Code [Section 65582\(g\)](#)).

⁵ Uncertified LAMC [Section 14.00.A.13](#) defines both QPSH Projects and affordability in the context of QPSH Projects.

⁶ Government Code [Section 65583](#).

⁷ CA Government Code [Section 65915\(c\)\(3\)](#).

policy would harmonize the certified LUP with existing state housing law. The proposed Policy I.A.19 references Government Code section 65915, which includes the potential parking ratio reductions that may be permitted consistent with the coastal resource protection policies of the Coastal Act. The proposed Venice Dell Project associated with the subject LUP amendment request is a QPSH Project under both the existing LAMC and proposed LUP definitions. For the reason stated above, the proposed LUP amendment would not offer the Venice Dell Project any new parking ratio reductions beyond those already available under the LUP and state law. However, the proposed LUP amendment would increase the maximum density and height available to the project under the LUP, as well as expand the scope of allowable uses.

B. CONSISTENCY ANALYSIS

Under Sections 30512(c), 30513, and 30514(b), the Commission shall certify a proposed amendment to an LUP if it meets the requirements of, and is in conformity with, the Chapter 3 policies of the Coastal Act. As detailed below, the City's proposed LUP amendment does not meet the requirements of, nor conform with, Chapter 3 of the Coastal Act.

Relevant policies of Chapter 3 of the Coastal Act and the certified Venice LUP are listed in **Appendix A** of this report.

1. Development and Community Character

Section 30250(a) of the Coastal Act requires new development to “be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it” and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. A broad spectrum of coastal resources can be impacted by the location, use, and design of new development. Other coastal resources are considered in the report subsections below. In the context of this subsection, analysis will focus on protection of Venice' unique patterns of development.

Sections 30251 and 30253(e) of the Coastal Act state that scenic areas and special communities shall be protected. These sections require permitted development to be visually compatible with the surrounding area's character. Section 30253(e) further requires protection of communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Venice is one of the most popular visitor destinations in California. In prior actions, including certification of the Venice LUP, the Commission designated Venice as a ‘Special Coastal Community’ whose character must be protected under Coastal Act Section 30253(e). The City prepared and submitted the Venice LUP for Commission certification in 1999, with provisions to “protect the unique character of the individual Venice neighborhoods by controlling development.” The unique community characteristics cited in the LUP include varied architecture, balanced mass and scale, and relatively small lot sizes compared to other coastal communities. The pattern of development uses was also considered.

Land Uses

The proposed LUP amendment establishes developments standards which contrast with the proposed Neighborhood Commercial land use designation. As proposed, development in Subarea A could accommodate the maximum density allowed by the Multiple Dwelling (R3) zone of the uncertified LAMC: a minimum 800 sq. ft. of lot area per dwelling unit ([Exhibit 2](#)). This would allow construction of up to 144 dwelling units in Subarea A, which encompasses 115,434 total sq. ft.

While this is consistent with the LUP's Community Commercial land use designation, the proposed Subarea A would be designated for Neighborhood Commercial land use. The Neighborhood Commercial land use designation is "generally characterized by one- and two-story low-rise structures" and encourages small-scale retail and community service uses per LUP Policy I.B.5. Residential uses are not acknowledged in any Neighborhood Commercial LUP policies. Certified LUP Policy I.B.2 does encourage mixed-use residential density of at least 800 sq. ft. of lot area per dwelling unit in all commercial designations, including 'Neighborhood Commercial', but this does not resolve the clear inconsistency in intended scale and use between the 'Neighborhood Commercial' designation and the proposed Venice Dell Project.

The discrepancy in Neighborhood Commercial development standards between the certified LUP and the proposed LUP amendment is not reconciled by any proposed revisions to LUP Policy I.B.5. Allowing large-scale residential development in a land use designation intended primarily for small-scale, non-residential development could have an adverse cumulative impact on community character when considering potential future projects. Properties designated for Neighborhood Commercial use could rely on the interpretation proposed by the City to eschew the uses outlined in Policy I.B.5 in favor of larger-scale residential development.

By contrast, the 'Community Commercial' designation specifically encourages a larger and more varied form of mixed-use development. Certified LUP Policy I.B.6 states, in relevant part: "The Community Commercial designation is intended to provide focal points for local shopping, civic and social activities and for visitor-serving commercial uses. They differ from Neighborhood Commercial areas in their size and intensity of business and social activities. ...The integration and mixing of uses will increase opportunities for employees to live near jobs and residents to live near shopping." This designation would make much more sense for Subarea A when considering the scope, density, and size of development intended for the project-specific subarea.

Regarding the potential impact of a new strip of 'Community Commercial' designated land on the Venice Median, the certified LUP shows a general intent to use the Venice Median for a mix of public and high-density residential land uses. Roughly 28% of the Venice Median is designated for 'Low Medium II Density' land use: the second highest allowable housing density in the LUP. Policy I.A.7 states that this designation is intended to accommodate duplexes and quadraplexes. A long swath of lots on either side of the Median are designated for Medium Density land use: the highest allowable housing density in the LUP. The remaining 72% of the Median is designated for 'Open Space' land use in LUP Exhibits 10b and 11b. In other coastal cities, an open space land use designation would typically preclude any form of development beyond accessways. In Venice, the certified LUP does not explicitly define the Open Space land use designation.

However, various LUP policies describe allowable uses in Open Space as including “non-intrusive public access amenities” (Policy I.A.4.d); public transit and parking (Policy I.C.8); and undeveloped recreational areas (Policy I.D.2). The portion of Median designated as Open Space is currently developed with public parking lots and a public library.²⁵

Overall, re-designating the subject 40 lots from ‘Open Space’ and ‘Low Medium II Density’ land use to ‘Community Commercial’ would not change the Venice Median’s overall intended use: a mix of public and residential development. To better harmonize the project-specific Subarea A and its land use designation, **Suggested Modification 6** moves the City’s proposed Subarea A subsection from certified LUP Policy I.B.5 (“Neighborhood Commercial Areas”) to certified LUP Policy I.B.5 (“Community Commercial Areas”).

The proposed amendment creates an option for new development to provide the land uses allowed by the relevant LUP land use designation or uses outlined in the uncertified LAMC’s “C2, Commercial” zone. This is redundant and could introduce more uses onsite without Commission review in the event of future changes to the LAMC. **Suggested Modification 7** revises the proposed language to eliminate references to the uncertified LAMC and update the referenced LUP policy to reflect ‘Community Commercial’ instead of ‘Neighborhood Commercial land use. (Other modifications also revise the designation of the Grand Canal terminus onsite, as discussed in [Subsection IV.B.3](#) below.)

Density and Intensity of Development

As stated above, the proposed amendment would allow construction of up to 144 dwelling units in Subarea A, which encompasses 115,434 total sq. ft. (2.65 acres) ([Exhibit 2](#)). Chapter II of the LUP states its intention to plan for “the year 2010 Venice population as projected by Southern California Association of Governments [in 1999] ...of approximately 38,325 persons.” It is difficult to obtain Venice-specific census data, but in 2021 the City estimated a total Venice population of 34,170.⁸ (The City’s census likely did not include Venice’s unhoused population.)

A deficit of more than 4,000 Venice residents compared to 1999 projections could illustrate any number of trends. One interpretation is a lesser availability of housing stock in Venice than originally projected in 1999. Another interpretation is a prohibitively expensive housing market limiting the number of residents. Alternatively, the Southern California Association of Governments may have simply overestimated population increases. Regardless, comparing the 1999 projection and 2021 census count shows that the LUP’s intended residential land use densities have not been realized.

Members of the public have raised concerns with the potential increase in residential density near the Venice Canals without an associated upgrade in utility services. These members of the public site frequent electricity ‘black-outs’ in the Venice Canals single-family residential neighborhood and contend that the proposed project would further burden the water, gas, and electric power grid in the Venice coastal zone. Concerns of inadequate infrastructure are more typically raised in rural areas of the coastal zone,

⁸ [“Venice Demographic Profile”](#), City Planning Department, 2021.

where housing is spread across vast undeveloped areas and transmission lines must cross agricultural lands.⁹

However (and despite the more than 4,000-resident deficit referenced above), Venice is a densely-developed portion of the City of Los Angeles, hosting the highest urban population density in the nation per the last four decades of U.S. Census Bureau data.²³ The Venice coastal zone is almost entirely built-out. The proposed 120-unit development is unlikely to pose a unique strain on public infrastructure in such a densely populated area. The City has confirmed that expanded public utilities are not an anticipated requirement to accommodate the proposed development.

Furthermore, studies show that multi-family housing developments use far less electricity and gas per unit than single-family housing. An Environmental Protection Agency study published in 2011 credits the “striking difference” in energy consumption per household between single-unit and multi-unit developments due to greater efficiency in compact unit sizes, shared walls, and shared ventilation systems (among other factors).¹⁰ A Chicago-based study published in 2022 found that “single-family users approximately double the demand of multi-family users on a per household basis.”¹¹ Local governments will have to consider how best to increase their housing stock to meet their Regional Housing Needs Allocations. High density housing is one of the most energy-efficient ways to do so.

The new development standards proposed for Subarea A would allow a maximum density of one dwelling unit per 800 sq. ft. of lot area, consistent with the maximum density allowed in all commercial designations per certified LUP Policy I.B.2. It is also consistent with the Medium Density designation per certified LUP Policy I.A.8. As discussed above, Medium Density lots are present along either side of the Venice Median. Thus, the proposed maximum density would not be out of step with density limits in the immediate vicinity of Subarea A. Further, such density would be consistent with the mandate of Coastal Act section 30250 that new residential and commercial development be located within existing developed areas able to accommodate it. Overall, the City’s existing infrastructure is adequate to support a potential maximum 144-unit increase in housing density on the Venice Median.

Mass and Scale

As stated above, City’s proposed Subarea A is project-specific and intended to allow the approval of the proposed Venice Dell Project. However, the City neglected to propose new development standards to allow the project’s proposed nine roof access structures and consolidation of 40 contiguous lots. Upon request, the City has confirmed its intent to approve these proposed features. **Suggested Modification 7** adds provisions to the proposed development standards for Subarea A allowing up to nine total roof access structures for all development throughout Subarea A; and the consolidation and subdivision of up to 40 lots into two lots for the construction of a mixed-use development with 100% affordable housing and public parking garages.

⁹ [LCP-3-SCO-23-0004-1-Part-B](#) (Santa Cruz County) is an example.

¹⁰ “Location Efficiency and Housing Type”, Environmental Protection Agency, 2011.

¹¹ [“Analysis of single- and multi-family residential electricity consumption...”](#), Pesantez et. al., 2023.

Allowing nine roof access structures across two subdivided lots would exceed the limits of certified LUP Policy I.A.1's limit of one roof access structure per development. However, this policy typically applies to small lots. Nine roof access structures would pose a noticeable bulk within the confines of a single small lot, but distributing the roof access structures across a 2.65-acre area breaks up the massing and reduces the noticeable bulk. The suggested modification also includes the limits on roof access structure height and size otherwise required by the certified LUP.

Additionally, allowing a 40-lot consolidation in Subarea A would exceed the limits of certified LUP Policy I.A.1.b, which prohibits consolidation of more than two lots in the North Venice subarea. However, certified LUP Policy I.B.7. allows the consolidation of more than two lots for mixed-use projects in the commercial land use designation if the project "conform[s] to the existing scale and character of the surrounding community." New development in Subarea A can incorporate design features to ensure conformance with the surrounding community, such as breaks, stepped-back segments, and architectural finishes to address concerns regarding the presence of a single, uninterrupted façade across several lots. Overall, allowing a maximum 40-lot consolidation and nine roof access structures in Subarea A will not have an adverse effect on community character.

The City's proposed language would allow a maximum 35-ft. height in Subarea A with the addition of a maximum 67-ft. tall campanile ([Exhibit 2](#)). However, the Venice Dell Project no longer proposes a campanile. **Suggested Modification 7** eliminates this reference and ensures that no development, other than maximum 10-ft. tall roof access structures, may exceed 35 ft. in height. It also adds a caption to specify the appropriate method of measuring building heights and the list of devices essential for building function that may exceed the specified height limit in a residential zone by five feet. The added language was obtained from other height exhibits of the certified LUP. As modified, the 35-ft. height limit is consistent with that of certified LUP Policy I.A.7.D for the 'Low Medium II Density' designation present along either side of Subarea A.

Thus, if modified as suggested, the proposed amendment is adequate to carry out the provisions of Coastal Act sections 30250, 30251 and 30253(e) of the Coastal Act with regard to development and community character.

2. Public Access

Section 30210 of the Coastal Act requires the provision of maximum access and recreational opportunities in the coastal zone. Section 30252 of the Coastal Act highlights the importance of providing adequate public transit and parking facilities along the coast. Section 30212.5 also requires distribution of parking facilities throughout the community to mitigate "the impacts, social and otherwise, or overcrowding or overuse by the public of any single area." Taken together, these sections emphasize the connection between vehicle transportation and public access to the coastal zone.

The Low Income Housing Tax Credit (LIHTC) program is a federal funding source that facilitates the construction of new residential development for low-income households.⁵⁸ Under the LIHTC program, the federal government provides state and local housing agencies with tax credits to incentivize private, affordable housing developers. Affordable

supportive housing must meet certain criteria for LIHTC eligibility, including recording a 55-year affordability covenant. This timeframe corresponds to a specific schedule of federal monitoring, including 15 years of active monitoring and 40 years of lesser monitoring by the United States Internal Revenue Service and state housing agencies.¹² After the 55-year period, property-owners must essentially restart the monitoring process with a new affordability covenant. This is the rationale for the proposed LUP amendment's 55-year minimum for supportive housing to obtain development incentives.

However, this is a lesser timeframe than the typical 75-year development lifespan assumed for residential development. Requiring only 55 years of affordability could allow the construction of development with fewer off-street parking spaces before the development is converted back to market-rate units after 55 years, without analyzing the impacts to access from market-rate unit parking demand. Alternatively, requiring more than 55 years of affordability could potentially exclude projects financed by LIHTC. California Government Code 65915.2 allows local governments to require periods of longer than 55 years for low-income, lower income, very low income, or extremely low income housing except when financed with LIHTC.

Suggested Modification 4 revises the proposed LUP Policy I.A.18 to require an affordability covenant for either the life of the development, or for at least 55 years if the project is funded by LIHTC. This is necessary to prevent the opportunistic use of temporary supportive housing for parking reductions without full analysis of access impacts without raising inconsistency with Government Code 65915.2.¹³

The proposed amendment requires vehicular access to development projects in Subarea A via driveways on North and South Venice Boulevards and requires the minimization of curb cuts when providing the subject driveways. However, expanding curb cuts in the subject area would reduce valuable public on-street parking. To preserve the stock of on-street parking, **Suggested Modification 7** revises the policy to remove existing curb cuts when they are no longer needed for vehicular access to the site; and prohibit new curb cuts unless the on-street parking spaces displaced by the curb cut are replaced in the immediate vicinity of the curb cut.

The proposed amendment includes reductions in the minimum amount of off-street parking required for QPSH Projects. As stated above, such reductions are included in the certified LUP for affordable housing; the City is seeking to amend the LUP to reflect that supportive housing is an included type of affordable housing. In addition to California Government Code Section 65915, Assembly Bill 2097 of 2022 added Government Code Section 65863.2, which prohibits public agencies from imposing parking requirements on most development within one-half mile of public transit.¹⁴ This encompasses most of the Venice coastal zone. However, reduced parking requirements cannot allow the loss of existing off-street public parking in Subarea A. **Suggested Modification 7** adds a subsection to the proposed development standards for Subarea A noting that QPSH Projects may provide

¹² "[LIHTC For Regular People](#)", Shelterforce, 2023.

¹³ California Government Code [Section 65915.2](#).

¹⁴ California Government Code [Section 65915](#)
Assembly Bill [2097](#) (2022)
California Government Code [Section 65863.2](#)

reduced parking consistent with Government Code Section 65915 for all new affordable housing units, but a minimum of 203 public parking spaces (including at least seven boat launch parking spaces) shall be maintained onsite for the life of the QPSH Project.

Certified LUP Policy II.A.3 requires a minimum number of off-street parking spaces based on the size and type of proposed development, including multi-family development. While the subject policy outlines exceptions, it does not reference the reduced parking requirements for affordable housing per certified Policies I.A.13 and I.A.14 (nor proposed Policy I.A.19). Similarly, Policy II.A.4 requires additional parking spaces for commercial and residential development in the LUP's designated Beach Impact Zone without exceptions referenced for 100% affordable housing. **Suggested Modifications 9 and 10** add 100% affordable housing as one of the listed exceptions in Policy II.A.3, stating that it is instead subject to the parking requirements of Policies I.A.13, I.A.14, and I.A.19. This will limit confusion when determining minimum parking requirements for new 100% affordable housing.

Affordable housing near the coast can help contribute to maximizing coastal access by providing housing opportunities for low- and moderate-income households, including workers necessary to staff visitor-serving uses. The shortage of affordable housing in the coastal zone today is a barrier to meaningful coastal access for moderate- and lower-income households. High costs of housing and historical exclusionary policies and practices have limited the ability of households of color to live, work, or recreate near the coast in many areas. As climate change causes inland temperatures to rise more frequently to dangerous levels, access to coastal areas with cooler weather is increasingly important.

Maximizing public access to the coast can take many forms. Providing affordable housing options for low- and moderate-income households plays a significant role in how likely individuals are to engage with the coast by reducing the financial and time costs of travel, by establishing social and cultural connections that facilitate public access, and by providing a welcoming environment for broader segments of the population. In addition, affordable housing provides opportunities for workers who sustain businesses that provide services to visitors and serve critical functions for public access, such as restaurants and hotels. In these ways, providing housing that is affordable to diverse segments of the population helps the State achieve its goals related to public access for all, even though it does not directly provide public access or recreational opportunities or substitute for other forms of required access. Thus, increasing housing equity in the coastal zone is essential to fulfilling the Coastal Act's goal of maximizing public access to and along the coast and advancing environmental justice.

Certified LUP Policy II.A.9 prohibits the use of parking spaces in public beach parking lots to satisfy off-street parking requirements for private development. This may create some confusion in the proposed Subarea A, where the existing public beach parking lot could be redeveloped with mixed-use development per the proposed LUP amendment. To clarify the provision and mandate the protection of the existing 196 public parking spaces in Subarea A, **Suggested Modification 11** revises LUP Policy II.A.9 to clarify that, in Subarea A, residential/commercial parking may be allowed only as part of a 100% affordable residential/mixed use development provided that a minimum of 203 public

parking spaces (including at least seven boat launch parking spaces) shall be maintained for public use onsite.

The proposed amendment would remove the “Existing Public Parking” label from the footprint of Subarea A in Exhibit 17b. This was intended to reflect the other allowable land uses onsite but undermines the need to preserve 203 total public parking spaces onsite.

Suggested Modification 15 eliminates the City’s proposed change in designation for Subarea A in Exhibit 17b, ensuring that the subject 40 lots remain noted as ‘Existing Public Parking’.

Section 30213 of the Coastal Act requires protection and, where feasible, provision of lower cost visitor-serving facilities. Section 30224 encourages increased recreational boating use of coastal waters with several methods, including “limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities[.]” Certified LUP Policy III.D.2 requires public access to the public boat launch ramp in Subarea A, but fails to outline the minimum requirements to ensure said access.

The boat launch ramp accessway is subject to several ongoing violations of past CDP terms and conditions. CDP No. 5-91-584 required the installation of three public access signs along North and South Venice Boulevard, while CDP No. 5-02-377-A1 required the boat launch parking lot to remain open to the public between 8 A.M. and sunset every day. Neither requirement has been followed by the City. The City did install a single “Venice Canals Boat Ramp” sign in August 2023, albeit without the review and approval of Commission staff but the sign is small, not easily seen by members of the public (due to its setback at least 50 ft. from the North Venice Boulevard roadway, and does not include the hours of operation of the boat launch. Consequently, the presence of a public boating accessway is not immediately clear when driving on North Venice Boulevard.

The City has confirmed that the cleaning contractor opens and closes the gated boat launch parking lot entrance when it accesses the site to maintain the canals. As a result, the boat launch parking lot is often opened late and closed early, or not opened at all. Additionally, the contracted cleaning company often leaves their maintenance vehicles, equipment, and dumpsters in the parking lot taking up public parking spaces. As a result, some number of boat launch parking spaces are often unavailable to the public even when the lot is open. The unpermitted, intermittent closures have persisted as far back as 1994. The City has been unable to identify which department is responsible for operation of the lot, which has likely contributed to its improper management and a lack of public awareness. In correspondence with Commission staff, several members of the public have expressed surprise that there is a public boat launch with public parking that provides the public with an opportunity to boat in the canals.

Thus, additional protections of public access to the boat launch ramp are clearly necessary. **Suggested Modification 12** revises LUP Policy III.D.2 to require the provision of at least seven public vehicle parking spaces located adjacent, or in as close proximity, to the boat launch ramp as feasible, with signage informing the public of available boat launch access. The modification additionally requires the boat launch parking lot to remain open to the public without gate obstructions.

Thus, for all these reasons, if modified as suggested, the proposed amendment is adequate to carry out the provisions of sections 30210, 30212.5, 30213, 30224, 30252, and 30253 of the Coastal Act with regard to public access.

3. Biological Resources

Sections 30230 and 30231 of the Coastal Act require that marine resources and the biological productivity of coastal waters be maintained and enhanced. Section 30107.5 of the Coastal Act defines ESHA as any area that: A) either hosts sensitive species or plays an especially valuable role in an ecosystem and B) may be easily disturbed by anthropogenic influence. Section 30240 of the Coastal Act requires development to ensure compatibility with any adjacent ESHA and prohibits “any significant disruption of habitat values” from such development.

Land use designations play a role in preserving biological productivity and habitat values in the Venice Canal System; certified LUP Policy IV.A.2 encourages open space and passive public recreation uses adjacent to the canals to minimize disturbance to wildlife. Certified LUP Exhibit 22b designates the entire Venice Canal System as ESHA, including the segment of Grand Canal bisecting the proposed Subarea A. Despite this, certified LUP Exhibit 10b shows the Grand Canal terminus as an undesignated roadway. The proposed LUP amendment would re-designate the 40 lots surrounding the Grand Canal terminus but leave the canal segment undesignated and listed as a street ([Exhibit 2](#)). **Suggested Modifications 13 and 14** revise Exhibits 10b and 14b to shift the “Canal St.” label from the canal to the actual Canal Street vehicle roadway located immediately north of North Venice Boulevard and re-designate the canal terminus as ‘Open Space’ consistent with the rest of the Venice Canal System.

The proposed amendment would allow the LUP’s highest residential density adjacent to the Grand Canal terminus, as well as mixed-use development likely to produce a high level of foot traffic along the sidewalks adjacent to the Grand Canal terminus. However, the subject canal segment is unique from the greater Venice Canal System in terms of its habitat values and surrounding uses. Most of the Venice Canal System offers sandy banks, transitional vegetation, and mudflats. In the greater Venice Canal System, wading birds loaf and hunt on the shores, intertidal invertebrates burrow in the mudflats, and fish navigate the open waters (to name only a few habitat uses shown in photos submitted by members of the public).

By comparison, the Grand Canal terminus offers solely open waters framed by vertical concrete embankments connecting directly to the abutting sidewalk. Commission staff observed waterfowl (such as ducks and geese), fish, encrusting invertebrates, and algae within the Grand Canal terminus in multiple site visits: all of which are unlikely to be disturbed by high levels of human activity already posed by the adjacent quadraplex and public parking lots. As such, designating the lots adjacent to the Grand Canal terminus as ‘Community Commercial’ and the uses that designation includes, subject to the LUP requirements for such uses, would not disturb biological productivity or disrupt habitat values of the canal.

Development buffers also play a role in preserving biological productivity and habitat values in the Venice Canal System; certified LUP Policy IV.A.4 requires a minimum 1.5 to two-foot landscape buffer between canal banks and sidewalks. There are no existing landscape buffers between the Grand Canal terminus and its walkways; the canal banks are concrete with extremely limited habitat value for sensitive species. To provide a new buffer between the concrete canal banks and the canal walkways onsite would narrow the width of the public walkways adjacent to the canal and reduce the area available for the boat launch public parking lot. It would also require the elimination of proposed dwelling units. These losses would result in limited benefit to wildlife in the Grand Canal terminus, considering wildlife in these open waters have already acclimated to a highly urbanized environment on the Venice Median.

Instead, the proposed amendment would require a minimum average 15-ft. (but no less than 10-ft.) setback from the canal-facing property line, with an open permeable yard area equivalent in size to at least 15 times the lot width (but no less than 450 sq. ft.) sited in the subject setback in Subarea A. This is consistent with the certified LUP's requirements for other canal-fronting residential subareas but would have unique consequences for Subarea A upon the lot consolidation and subdivision proposed by the Venice Dell Project: the proposed language would require a minimum 2,952 sq. ft. permeable yard area on either side of the canal.¹⁵

This poses serious constraints for the east side of the canal where a public boat launch parking lot must be preserved. Constructing the parking lot with permeable pavers could allow direct infiltration of vehicle pollutants to the groundwater. Providing some permeable landscaping between the canal-facing property-line (i.e. the eastern edge of the canal sidewalk) would be feasible, but 2,952 sq. ft. of landscaping would likely push the boat launch parking lot further inland from the boat launch ramp than its current location.

The proposed amendment also fails to account for, or require, the need for a sophisticated drainage system in the area beyond the required average 15-ft. setback. The existing footprint of proposed Subarea A offers 9,320 total sq. ft. of permeable area across 2.65 acres and no drainage system to treat vehicle pollutants. In residential areas where runoff typically travels directly from roofs or sidewalks, permeable area is adequate to preserve water quality of the canals and groundwater. However, the Venice Median is developed with several asphalt public parking lots where vehicles may drip oil, antifreeze and other pollutants. Mixed-use development that preserves the existing public parking lots in proposed Subarea A could introduce vehicle pollutants to the permeable area onsite without a more sophisticated drainage system that treats, captures, and (ideally) re-uses runoff.

The associated Venice Dell Project would combine a multi-pathway drainage system with strategically placed permeable areas onsite to minimize runoff. The drainage system would include trench drains along the canal-facing property lines that will more effectively prevent the introduction of pollutants from the surface boat launch parking lot than landscaping likely would. **Suggested Modification 7** revises the proposed canal setback requirements to require a minimum total 11,266 sq. ft. of permeable area throughout Subarea A in conjunction with a multi-path drainage system that includes trench drains along the

¹⁵ 195-ft. consolidated lot width x 15 ft. = 2,952 sq. ft. on either side of canal.

property lines facing the canal. This will improve the ability of new development in Subarea A to protect water quality in both the Venice Canal Systems and the groundwater.

Thus, if modified as suggested, the proposed LUP amendment would adequately preserve biological productivity of the Grand Canal terminus and avoid disruption of habitat values in a manner consistent with Coastal Act sections 30230, 30231, and 30240.

4. General Corrections

Factual Corrections and Updates

The Los Angeles Housing & Community Investment Department (“HCIDLA”) has changed its title to the Los Angeles Housing Department (LAHD) since the City submitted the subject LUP amendment request ([Exhibit 2](#)). As a result, the proposed amendment uses the outdated title. **Suggested Modifications 1 and 4** correct outdated references to the subject agency.

The proposed amendment defines supportive housing as intended to support “persons with low incomes who have one or more disabilities and may include” other populations (emphasis added). This limits the target population to people with disabilities and directly conflicts with the proposed amendment’s definition of the target population as (emphasis added): “persons with qualifying lower incomes who (i) have one or more disabilities... or are chronically homeless”.¹⁶ The latter definition encompasses a wider range of persons, including people who may be unhoused without a disability. Upon discussion with Commission staff, the City confirmed it did not intend to limit supportive housing to occupants with disabilities. **Suggested Modification 2** corrects the definition by restructuring the sentence to include people with disabilities as one of multiple low-income populations, rather than one of the non-negotiable qualifiers.

The proposed development standards for Subarea A would conflict with those of various other certified LUP policies, raising potential uncertainty as to which policy may apply in the future. Certified LUP Policy I.A.1 limits residential development in the Venice coastal zone to the maximum densities, building heights, and bulks of LUP exhibits 9 through 6, but the development standards listed in these exhibits are not proposed for revision and would conflict with those of Subarea A. **Suggested Modification 3** revises LUP Policy I.A.1 to clarify that Subarea A is subject to the provisions of LUP Policy I.B.6 and not those of Policy I.A.1.

The proposed amendment includes two independent definitions of supportive housing: the proposed formal definition and the uncertified Health and Safety Code’s definition referenced in proposed LUP Policy I.A.19. **Suggested Modification 5** eliminates the uncertified reference to a redundant definition and adds language to clarify that the policy is intended to allow reduced parking for both QPSH Projects and supportive housing projects that do not meet the QPSH criteria.

¹⁶ The proposed LUP amendment’s discrepancy between the definitions of ‘supportive housing’ and the ‘target population’ originate from uncertified LAMC sections [12.03](#) and [14.00.13.2](#), respectively. The discrepancy is not present in state law.

Certified LUP Policy I.D.1 lists allowable uses adjacent to the canals, limiting residential development to single-family dwellings and public parking to subterranean or surface lots. However, the proposed Subarea A would allow parking garages, commercial and high-density residential development adjacent to the Grand Canal terminus with no reference to Policy I.D.1. **Suggested Modification 8** revises LUP Policy I.D.1 to add 100% affordable housing with a parking garage and a public parking garage as allowable canal-fronting uses in Subarea A. The subject modification also revises Policy I.D.1 to reference public access and recreation, including the public boat launch ramp, as allowable uses adjacent to the canals and lagoon.

Certified LUP Exhibits 10b and 14b show land use designations and height restrictions, respectively. The proposed amendment would add a new subarea to the exhibits without updating their respective titles. **Suggested Modifications 13 and 14** revise Exhibits 10b and 14b to include proposed Subarea A with the other listed subareas in the exhibit titles.

The proposed amendment shows a discrepancy between the proposed bounds of Subarea A in amended Exhibit 14b versus the other amended exhibits: Exhibit 14b excludes seven lots located between Strongs Drive and Pacific Avenue from the proposed Subarea A. The City has confirmed that this omission was an error. **Suggested Modification 14** resolves the error by extending the boundaries of Subarea A westward to encompass the subject seven lots.

The proposed amendment also includes two conflicting height limitations. LUP Exhibit 14a would be revised to limit development in Subarea A to the maximum height regulations of the uncertified LAMC, while also adding a 35-ft. height limitation with a 67-ft. tall campanile in Subarea A. The City may have intended to impose the 35 ft. height limitation of the uncertified Commercial (C2) zone, but no specific section is cited in the proposed language; and the LAMC allows a maximum 75 ft. development height in the Limited Commercial (CR) zone and up to 13 stories in the Parking Building (PB) zone.¹⁷

Suggested Modification 14 eliminates the reference to an unspecified and uncertified height limit, replacing it with reference to the City's proposed height limit in Subarea A

Therefore, if modified as suggested, LUP Amendment Request No. LCP-5-VEN-23-0037-1 would meet the requirements of and be in conformity with the Chapter 3 policies of the Coastal Act.

C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

California Public Resources Code Section 21080.9 exempts local governments from the requirement of preparing environmental review documentation in connection with its activities and approvals necessary for the preparation and adoption of an LCP. The Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process under California Code of Resources Section 15251(f). Thus, under Section 21080.5 of CEQA, the Commission's review and analysis of the LCP amendment in this staff report satisfies CEQA environmental review requirements. Nevertheless, Public Resources Code Section 21080.5(d)(2)(A) prohibits the Commission from approving a proposed LCP (or amended

¹⁷ Uncertified LAMC [Section 12.21.1.](#)

LUP) if there are feasible alternatives or mitigation measures available that would substantially lessen significant adverse impacts to the environment.¹⁸

As outlined in this report, the proposed LUP Amendment—if modified as suggested— will be consistent with the Chapter 3 policies of the Coastal Act. The Commission further finds that approval of the LUP Amendment with suggested modifications will not result in significant adverse environmental impacts within the meaning of CEQA. Certification of the LUP if modified as suggested complies with CEQA because: 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment, and 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts which the LUP Amendment may have on the environment. Thus, the Commission finds that the proposed LUP amendment if modified as suggested will be consistent with Section 21080.5(d)(2)(A) of the Public Resources Code.

¹⁸ This is also required pursuant to Title 14 of California Code of Regulations Section [13540\(f\)](#).

Appendix A – Relevant Coastal Act and Certified Venice LUP Policies.

Section 30210 of the Coastal Act states:

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

Section 30212.5 of the Coastal Act states:

Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, or overcrowding or overuse by the public of any single area.

Section 30213 of the Coastal Act states:

Lower cost visitor and recreational facilities shall be protected, encouraged and where feasible, provided. Development providing public recreational opportunities are preferred.

Section 30224 of the Coastal Act states:

Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.

Section 30252 of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

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Certified LUP Policy I.A.14. Parking Requirements for Affordable Housing states, in relevant part:

Reduced parking is permitted for low income units only if: a) the project is consistent with LUP policy I.A.13; and b) it is demonstrated that the prospective occupants of the project will have a reduced demand for parking. ...

Certified LUP Policy II. A. 3. Parking Requirements states, in relevant part:

The parking requirements outlined in the following table shall apply to all new development, any addition and/or change of use. The public beach parking lots and the Venice Boulevard median parking lots shall not be used to satisfy the parking requirements of this policy. ...

Multiple dwelling and duplex on lots 40 feet or more in width, or 35 feet or more in width if adjacent to an alley: 2 spaces for each dwelling unit; plus a minimum of 1 (one) guest parking space for each 4 (four) or fewer units (i.e. 2.25 spaces per unit; always round-up to highest whole number of spaces). Exception: For projects where all required parking spaces are fully enclosed, any required guest spaces may be paid for at the same in lieu fee rate defined for BIZ parking. ...

General Retail Store, except as otherwise provided: 1 space for each 225 square feet of floor area. ...

Restaurant, Night Club, Bar, and similar establishments and for the sale or consumption of food and beverages on the premises 1 space for each 50 square feet of service floor area (including outdoor service areas).

Certified LUP Policy II. A. 4. Parking Requirements in the Beach Impact Zone states, in relevant part:

Any new and/or any addition to commercial, industrial, and multiple-family residential development projects within the Beach Impact Zone shall provide additional (in addition to parking required by Policy II.A.3) parking spaces for public use or pay in-lieu fees into the Venice Coastal Parking Impact Trust Fund.

Beach Impact Zone (BIZ) Parking Impact Trust Fund criteria:

Commercial and industrial projects in the BIZ shall provide one additional parking space for each 640 square feet of floor area of the ground floor. ...

Multiple family residential projects in the BIZ shall provide an additional parking space for each 1,000 square feet of floor area of the ground floor for multiple dwelling projects of three units or more. ...

Section 30250(a) of the Coastal Act states, in relevant part:

New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

Section 30251 of the Coastal Act states, in relevant part:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

Section 30253 of the Coastal Act states, in relevant part:

New development shall:

...(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Certified LUP Exhibit 14b, Height states, in relevant part:

Maximum Building Height

F. [North Venice Subarea:] 30' with a flat roof, 35' with varied or stepped back roofline

Certified LUP Policy I.A.1. Residential Development states, in relevant part:

- A. Roof Access Structures. Building heights and bulks shall be controlled to preserve the nature and character of existing residential neighborhoods. Residential structures may have an enclosed stairway (roof access structure) to provide access to a roof provided that:
 - i. The roof access structure shall not exceed the specified flat roof height limit by more than 10 feet;
 - ii. The roof access structure shall be designed and oriented so as to reduce its visibility from adjacent public walkways and recreation areas;
 - iii. The area within the outside walls of the roof access structure shall be minimized and shall not exceed 100 square feet in area as measured from the outside walls; ...
- B. Residential Lot Consolidations. In order to preserve the nature and character of existing residential neighborhoods, lot consolidations shall not be permitted in

the Venice Canals and Silver Strand residential neighborhoods. No more than two lots may be consolidated in the Ballona Lagoon West, Ballona Lagoon (Grand Canal) East, Southeast Venice, Milwood, North Venice and Oxford Triangle neighborhoods and on walk streets.

Certified LUP Policy I.A.7.D. Multi-family Residential - Low Medium II Density states, in relevant part:

Oakwood, Milwood, Southeast and North Venice.

Use: Duplexes and multi-family structures.

Density: One unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units. ...

Height:...North Venice: Not to exceed 30 feet for buildings with flat roofs; or 35 feet for buildings utilizing a stepped back or varied roofline. The portion that exceeds 30 feet in height shall be set back from the required front yard one foot for every foot in height above 30 feet. Structures located along walk streets are limited to a maximum height of 28 feet. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).

Certified LUP Policy II.A.7. Multi-family Residential - Low Medium II Density states, in relevant part:

D. Oakwood, Milwood, Southeast and North Venice.

Use: Duplexes and multi-family structures.

Density: One unit per 1,500-2,000 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units.

Height:...North Venice: Not to exceed 30 feet for buildings with flat roofs; or 35 feet for buildings utilizing a stepped back or varied roofline. The portion that exceeds 30 feet in height shall be set back from the required front yard one foot for every foot in height above 30 feet. Structures located along walk streets are limited to a maximum height of 28 feet. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).

Certified LUP Policy I.B.7 Commercial Development Standards states, in relevant part:

...Lot Consolidation. Two commercial lots may be consolidated, or three with subterranean parking with the following restrictions:

1. Methods for insuring that the structure does not look consolidated (breaks in front wall of ten feet minimum) shall be utilized.
2. Subterranean parking shall be fully depressed with roof at natural grade.

Exception: Lot consolidation of more than two lots shall be permitted for mixed-use projects which conform to the existing scale and character of the surrounding community and provide adequate on-site parking. ...

Certified LUP Policy I. D. 1. Canals and Ballona Lagoon Waterways states, in relevant part:

The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the “Open Space” designation.

Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs.

Certified LUP Policy I.E.1. General states, in relevant part:

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.

Section 30107.5 of the Coastal Act defines “ESHA” as:

“Environmentally sensitive area” means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240 of the Coastal Act states:

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(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Certified LUP Policy IV.A.2. Permitted Uses states:

Uses permitted in or adjacent to the canals shall be implemented in a manner to protect the biological productivity of marine resources and maintain healthy populations of marine organisms. Such uses as open space, habitat management, controlled nature study and interpretation, and passive public recreation use of walkways for birdwatching, photography, and strolling shall be encouraged and promoted.

Certified LUP Policy IV. A. 3. Venice Canals Landscape Buffer states:

To protect the marine habitat, a one and one-half to two-foot-wide safety landscape buffer strip shall continue to be provided and maintained between the canal banks and sidewalks. Landscaping in the buffer strip shall consist of native coastal strand marshland or wetland vegetation as specified in the Venice Canals Rehabilitation Plan approved by Coastal Commission Coastal Development Permit 5-91-584.

Appendix B – Substantive Files.

1. Policies of the certified Venice Certified Land Use Plan cited in report.
2. City of Los Angeles Local Coastal Development Permit Case No. CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP, dated December 1, 2021.
3. Materials associated with CDP Application No. 5-22-0588 and De Novo Application No. A-5-VEN-22-0042.