

DRAFT – June 2, 2015

VENICE COASTAL ZONE

INTERIM CONTROL ORDINANCE

Background:

Over the past 10 years, since the inception of the Venice Coastal Zone Specific Plan, the city ordinance approved in 2004 (VCZSP), the pace of development in Venice has greatly accelerated. The cumulative impact of development in Venice has had and continues to have a significant adverse effect on the character of Venice. The adverse developments include: a CEQA categorical exemption is being used (including for VSO's), rather than an environmental analysis of cumulative impact being performed, for projects where the adverse cumulative impact of successive projects of the same type, in the same place, would be significant; approval of projects with relatively massive and large-scale structures on relatively small lots, that are incompatible with the mass, scale and character (MSC) of their existing surrounding neighborhood/streetscape (1-2 block area), is causing a tainting of the character of certain neighborhoods/streetscapes, which is thus prejudicing the LCP; the rapid and most times careless gentrification of the Venice neighborhoods in terms of their character and density, and especially in terms of the loss of affordable units, is causing a rapid, permanent and significant adverse change in the social, racial and economic diversity of the Venice neighborhoods.

Taken together, these developments have had a significant adverse impact on the quality of life of the Venice neighborhoods, a quality of life that can only be described as priceless and of unlimited value to the Citizens of Venice, the City of L.A., and all visitors to Venice, present and future.

Following are the three issues/concerns that are causing the most significant adverse impacts:

1) VSO (Venice Sign Off procedure) is a Significant Adverse Impact on Character of the Venice Coastal Zone Neighborhoods and a Significant Adverse Impact on Existing Coastal Housing For Low- & Moderate-Income Persons in the Venice Coastal Zone (a Coastal Resource of vital interest and sensitivity, as per the Coastal Act)

- The impact of the Venice Sign Off procedure, aka Director of Planning Sign-Off procedure (VSO), approved as part of the Review Procedures for Venice Coastal Development Projects (Section 8. of the VCZSP), allows for administrative approval/clearance of certain specified projects, with no "public process" -- no public notice, no public hearing, and no appeal right, and with very little to no transparency.
- The VCZSP, including the VSO procedure, was not reviewed under CEQA for possible significant adverse cumulative impacts, as would normally be required for a City Ordinance such as this. In other words, an environmental analysis, aka CEQA review (California Environmental Quality Act, state law), was not done in 2004 for purposes of approval of the VCZSP. This appears to be because the VCZSP had been intended to represent the Local Implementation Plan (LIP) portion of the Venice Local Coastal Program, as required by the Coastal Commission and defined in the Coastal Act (LCP). Thus, the VCZSP was prepared assuming that it would be certified by the Coastal Commission as part of the LCP, in which case a CEQA analysis is not required. Also because the VCZSP was originally intended to represent the LIP, the VCZSP was not meant for pre-LCP processing, but rather for post-LCP

processing, as evidenced by its use of the terms “Appealable Area” and “Non-Appealable Area” (defined ONLY in the post-LCP procedures of the Los Angeles Municipal Code (LAMC)). The VSO is an exception procedure for post-LCP processing only. As such, the VSO does not require an environmental analysis, which includes a cumulative environmental impact analysis.

- In addition, the VSO has been used consistently and since its inception for processing of Mello Determinations. This should not have been allowed as the VSO procedure specifically does not have an Appeal Right. Thus, the Public, particularly the affected tenants, have been denied their Appeal Right for every Mello Determination that has been processed using the VSO procedure, which is essentially all of them.
- Many of the developments approved over the past 10 years under the VCZSP, mostly using the VSO procedure, have been incompatible with the MSC of the Venice neighborhoods, and thus have caused a significant adverse cumulative impact on the existing neighborhoods. Use of this procedure has had, and continues to have, unacceptable, significant, permanent adverse impacts on the Venice Coastal Zone neighborhoods. Its use, meant only for post-LCP processing, must be stopped.

2) In Lieu Parking Fee is a Significant Adverse Impact on Public Access

- Also due to the lack of a CEQA review, the material, adverse cumulative impact on Public Access of the VCZSP’s In Lieu Parking Fee had not been identified.
- Section 13 of the VCZSP should have followed its policy equivalent, the General Plan’s Venice Land Use Plan, certified by the Coastal Commission in 2001 (LUP), which states in Policy II.A.4., Implementation Strategies, that “The In lieu [Parking] Fee for a Beach Impact Zone (BIZ) parking space shall be established in the LIP at a rate proportional to the cost of providing a physical parking space.” (As noted above, the VCZSP was originally proposed to be the LIP but was not certified as such by the Coastal Commission.) Instead, the fee was set at a static \$18,000 per parking space.
- The difference between the \$18,000 per parking space in the VCZSP and the market rate of providing a parking space in the Venice Coastal Zone has resulted in a huge windfall for anyone wishing to “buy parking” using the In Lieu Parking Fee.
- Until the In Lieu Parking Fee is adjusted to reflect the current cost of a parking space (“rate proportional to the cost of providing a physical parking space” as per the LUP), an effort currently underway under the direction of Councilmember Mike Bonin, it is necessary to protect Venice by restricting the current In Lieu Parking Fee from further use, until such time as the LCP or a new City Ordinance is in place which changes the \$18,000 to an amount reflecting the current cost of a Venice Coastal Zone parking space. (NOTE: no parking solutions have yet been funded using the In Lieu Parking Fees paid to date).

3) Demolitions and Evictions are occurring in Venice without proper analysis and/or documentation from City Housing (HCID) and City Planning related to the Mello Act, the Coastal Act and Historical Preservation

Taken together the City of Los Angeles is now putting itself at risk of lawsuit because of violations of its own housing and land use ordinances, codes, procedures and regulations, and of state laws, including the Mello Act and the Coastal Act. Furthermore, to the extent that the City is prejudicing its ability to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976, City Planning and the Department of Building & Safety should be directed to stop all development until the problems causing this prejudicing are rectified such that the Venice LCP can in fact be prepared in conformity with Chapter 3 of the California Coastal Act of 1976, as required by the Coastal Act, state law.

VENICE COASTAL ZONE INTERIM CONTROL ORDINANCE

WHEREAS, Proposition 20, passed by the People of the State of California in 1972, declared the California Coast a resource of statewide significance, and thus, the California Coastal Act of 1976 (Coastal Act) was promulgated, which established the following Legislative Findings and Declarations:

- (a) That the California Coastal Zone is a distinct and valuable natural resource of vital and enduring interest to all the People and exists as a delicately balanced ecosystem.
- (b) That the permanent protection of the state's natural and scenic resources is a paramount concern to present and future residents of the state and nation.
- (c) That in order to promote the public safety, health, and welfare, and to protect public and private property, wildlife, marine fisheries, and other ocean resources, and the natural environment, it is necessary to protect the ecological balance of the Coastal Zone and prevent its deterioration and destruction.
- (d) That existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well being of the people of this state and *especially to working persons employed within the Coastal Zone; {¶ 3, 4, 7, 8, 14, 15, 16, 17, 35, 39}*

WHEREAS, the Legislature also established the following Findings and Declarations, which constitute the basic goals of the State for the Coastal Zone:

- (a) Protect, maintain, and where feasible, enhance and restore the overall quality of the Coastal Zone environment and its natural and artificial resources.
- (b) Assure orderly, balanced utilization and conservation of Coastal Zone resources taking into account the social and economic needs of the People of the state.
- (c) Maximize public access to and along the coast and maximize public recreational opportunities in the Coastal Zone consistent with sound resource conservation principles and constitutionally protected rights of private property owners.
- (d) Assure priority for coastal-dependent and coastal-related development over other development on the coast; {¶ 5, 6, 7, 8, 12, 15, 16, 17}

WHEREAS, in order to support the Coastal Act's objective to protect the scenic and visual qualities of coastal areas as a resource of public importance, the Legislature mandated that developments permitted in the Coastal Zone shall be visually compatible with the character of the surrounding

area; {¶ 3, 4, 5, 8, 9, 10, 21, 24, 29}

WHEREAS, the Venice LCP is intended to accomplish the Coastal Act objectives of preserving coastal amenities and increasing public access to the shoreline and to address the City's need to plan for the improvement of the physical, social and economic environment of its communities in an orderly and timely manner; {¶ 1, 3, 4, 5, 6, 8, 9, 10, 13, 14, 15, 32}

WHEREAS, as per the General Plan's LUP, Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the Coastal Act; {¶ 1, 9, 10, 24, 31, 35}

WHEREAS, as per the General Plan's LUP, new development within the Venice Coastal Zone shall respect the scale and character of community development, and as such all new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods; {¶ 1, 5, 7, 9, 10, 15, 29, 31, 39}

WHEREAS, development in Venice has been increasing at a significant and unforeseen pace since the time the VCZSP was approved by the City, in 2004; {¶ 1, 5, 29, 32, 33}

WHEREAS, the ongoing rapid acceleration of development in the Venice Coastal Zone has given cause for serious concern within Venice neighborhoods that the cumulative impact of successive projects of the same type in the same place are having a very significant, serious, permanent adverse cumulative effect on the MSC, the social, racial and economic diversity, and the quality of life in the Venice Coastal Zone neighborhoods; {¶ 1, 5, 7, 8, 14, 15, 16, 17, 33, 35, 39}

WHEREAS, there is serious concern within the Venice neighborhoods that because the Coastal Act and the LUP policies and development standards (prepared to comply with the Coastal Act and part of the City's General Plan) have generally not been followed, and that because CDP Findings have generally been inadequate and not met the minimum legal standards for Findings, the result has been that many developments are incompatible with, and are having a significant adverse impact on, the MSC of the existing Venice Coastal Zone neighborhoods, which has resulted in the prejudicing of the City's ability to prepare the LCP in conformance with Chapter 3 of the Coastal Act; {¶ 1, 3, 4, 6, 8, 22, 23, 24, 25, 30, 32, 37, 38, 39}

WHEREAS, having a Cumulative Environmental Impact Study is critically important to the analysis currently being done by the Venice Neighborhood Council (VNC) MSC Committee, with respect to approaches being used in analyzing the compatibility of the development with the existing surrounding neighborhood's MSC; {¶ 7, 18, 32, 39}

WHEREAS, as per the LUP, the existing Venice Coastal Zone housing for low- and medium-income persons is a Sensitive Coastal Resource Area of the Coastal Zone, of vital interest and sensitivity; {¶ 5, 11, 34}

WHEREAS, Los Angeles is known as the city with the least amount of Affordable Housing stock in the nation, and Venice is known as the area within the city of Los Angeles that is losing Affordable Housing at the fastest rate; {¶ 5, 11, 34}

WHEREAS, it is of critical importance that development occurring during the time of preparation of the Venice LCP does not prejudice, impede or negate the ability of the City to prepare a LCP that

is in conformity with Chapter 3 of the Coastal Act; {¶ 1, 2, 3, 15, 18, 32, 37, 39}

WHEREAS, there is a need to protect the Venice community from further use of the current significantly “below market” In Lieu Parking Fee (no parking solutions have yet been funded using the fees) until a modified policy is in place via either the LCP, a change to the VCZSP, or a new City Council Ordinance; {¶ 1, 21}

WHEREAS, certain errors and inconsistencies in the VCZSP have been identified that are causing harm to the Venice Community, including the In Lieu Parking Fee provisions, which is inconsistent with the LUP (Section 13), certain erroneous references to post-LCP procedures in the processing/review procedures (Section 8), definitions for Change of Use and Change in Intensity of Use are in conflict with the LUP (Section 2), and other miscellaneous errors and inconsistencies, which are causing harm to the Venice neighborhoods; {¶ 1, 2, 9, 10, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 32, 33, 34, 35, 36, 37, 38}

WHEREAS, the Coastal Commission’s Regional Interpretive Guidelines for the Coastal Act and the LUP, certified by the Coastal Commission in 2001, provide guidance in determining how the policies of the Coastal Commission shall be applied in the Coastal Zone prior to the certification of a LCP; {¶ 1, 2, 24, 32, 35, 36, 37, 38, 39}

THEREFORE BE IT RESOLVED THAT THE FOLLOWING ACTIONS AND CHANGES ARE EFFECTIVE WITH THE APPROVAL OF THIS INTERIM CONTROL ORDINANCE

Note: all references to procedural changes required to be made by the California Coastal Commission shall be reviewed and approved by its Executive Director, with documentation of such review and approval to be provided via letter or email to Councilmember Bonin’s office, which will process any changes affecting the City’s codes for Coastal Development Permits (LAMC 12.20.2) for appropriate City approval.

This Interim Control Ordinance establishes interim regulations relating to the issuance of building permits, the demolition of structures, in whole or in part, and the construction of new structures on lots within the Venice Coastal Zone, during the time of the preparation of the LCP, in order to assure that development prior to and during this ongoing LCP coastal planning effort does not prejudice, impede or negate the goals and policies of the ultimate certified LCP.

1. No demolition or eviction shall be permitted without all city and state regulations being adequately analyzed by the proper city official. The proper process according to applicable City and State law shall be performed and thoroughly documented; and no ad-hoc signatures or “management directive” by the Department of Building & Safety Plan Check or City Planning personnel or with respect to any approval by any department with respect to the Building Permit Clearances, shall be allowed in place of the required analysis and documentation for Affordable Housing, Mello Act analysis, Historical Preservation analysis and Coastal Act compliance.

2. The following changes shall be made to the VCZSP:

- a. More detailed criteria for Findings on MSC shall be provided, in order to assure that the MSC provisions of the VCZSP and the LUP are clearly and consistently applied to all projects within the Venice Coastal Zone, no matter how processed;
 - b. The In Lieu Parking Fee provisions shall be revised in order that such fee reflects current market value and has an annual adjustment based on CPI or similar index, as appropriate;
 - c. All references to post-LCP procedures that were meant to apply only to post-LCP periods shall be identified and revised to the correct pre-LCP procedure, if any, and all inconsistencies between the VCZSP and the LUP, including for Sections 2, 8 and 13, shall be corrected;
 - d. The VSO processing procedure, originally meant to be a post-LCP processing procedure/clearance, as evidenced by the fact that it includes Appealable and Non-Appealable post-LCP terminology, shall be eliminated effective immediately. For all projects for which a VSO was previously utilized and for which a Building Permit has not yet been issued as of the date of this ICO or for which a Building Permit has been issued within the last 45 days prior to this ICO, the VSO shall be revoked and a Specific Plan Project Compliance Permit (SPP) shall be prepared and issued in its place.
 - e. The definition of "Architectural Diversity," as per LUP Policy I. E. 3. Shall be added to Section 5. Definitions.
2. All Coastal Zone clearances for purposes of Building Permit issuance shall be made directly to the LADBS Building Permit clearance system by the State's Coastal Staff and not via City Planning Staff. Access for separate and secure posting to the LADBS and City Planning systems of record for state-issued permits and clearances shall be provided to the applicable, assigned state Coastal Commission District Office Staff (only).
 3. NO demolitions shall be approved by the City OR the State separately from the related project or occur in advance of approval of the related project, so as not to risk prejudicing the approval of the Building Permit for the proposed new structure being constructed, so as not to allow for loopholes.
 4. ALL Venice Coastal Zone demolitions shall require conspicuous Notice, posted such that it is easily readable from off of the premises, 30 days in advance of the planned demolition.
 5. A hold shall be placed on all Small-Lot Subdivision projects until the Department of City Planning prepares a report reviewing the merits of such projects and any problems with respect to: 1) Venice Coastal Zone policy requirements for MSC, 2) the accuracy and ethics of the processing procedures being used for such projects, and 3) the cumulative impact of such projects, and 4) whether Small-Lot Subdivisions are meeting their intent and stated goal with respect to affordable housing options in the Venice Coastal Zone. Such report shall make recommendations with respect to proper requirements for review of MSC, processing procedures used, cumulative environmental impact analysis, and the intent and goal of such projects. Upon approval of the report by the Coastal Commission Senior Deputy Director and the Councilmember and the VNC, Small-Lot Subdivision projects shall recommence, using the recommended processes and procedures.
 6. No adjustments, variances or modifications, including zone variances, shall be approved for projects in the Venice Coastal Zone, by City Planning, LADBS or any other entity or individual in the City, during the time that this ICO is in effect.

7. A Cumulative Environmental Impact Study and Report of Findings and Recommendations with respect to development in the Venice Coastal Zone shall be prepared by City Planning no later than 60 days after the effective date of this ICO and provided to Councilmember Bonin, the VNC, and the Coastal Commission Senior Deputy Director, who will review, modify and approve such Findings and Recommendations, and such recommendations will then become a permanent part of this ICO.
8. Both the City Coastal Exemption (CEX) procedure and the State Coastal Exemption procedure or practice shall be eliminated immediately, for the Venice Coastal Zone.
9. Councilmember Bonin shall issue a letter making clear that the definition of "Architectural Diversity" under the Coastal Act (LUP Policy 1.E.3), includes "utilization of varied planes and textures" and, most importantly, "maintenance of the neighborhood scale and massing," until such time that this definition can be added to the VCZSP and the LUP.
10. The "butterfly" roofline design shall be discontinued effective with all projects that do not yet have approved building permits as of the date of this ICO, and such design shall be limited to the flat roof height for the Subarea as per the VCZSP.
11. The City shall act immediately to curtail the loss of affordable housing in the Venice Coastal Zone by immediately:
 - a. Fully enforcing existing federal, state and city regulations—including orders to comply for prohibited short-term rentals and other properties in violation of laws governing land use and housing in Venice with respect to conversion/change of use of housing, especially affordable housing, into short-term rentals and de facto hotels--and laws prohibiting short-term rentals in residential zones and in commercial zones if the Certificate of Occupancy is for Apartment use.
 - b. Directing that adequate resources and detailed instructions be immediately provided to City departments, including especially (but not limited to) City Planning, Building & Safety, Housing and the City Attorney, in order that they immediately put the following actions into effect until such time as the City has determined its policies, rules and regulations regarding short-term rentals and has enacted an ordinance or ordinances to implement them:
 - i. Carefully follow the Interim Administrative Procedures for complying with the Mello Act, including but not limited to those related to handling of Mello checklists and applications, Mello Determinations and Appeals (including filing with the related case), conversions/changes of use or occupancy, including careful review of any currently pending conversions/changes of use and deferral of approval of any conversion/change of use requests until relevant enforcement procedures are clarified and confirmed feasible;
 - ii. Clarify city procedures regarding the definition of "feasible" as pertains to the intent and the letter of the Mello Act law, which is primarily to protect affordable housing in the Coastal Zone and which is not primarily to provide bonus density, which is covered in separate laws, and which is not meant to be primarily a profit making opportunity for developers;
 - iii. Improve the HCID standard of review procedures and documentation related to the determination of replacement affordable units to a "generally accepted" standard and implement procedural controls in order to stop the current abuse of the Mello

- Act via loopholes and workarounds, including a final Building Permit clearance by HCID for Owners using the "owner-occupied single-family dwelling" exemption;
- iv. Require filing of the Mello Act application at the same time as the original filing of the project application.
 - v. Prepare and widely disseminate (including and especially to citizens being evicted) a "Tenant's Bill of Rights" that covers the rights of tenants under both the Rent Stabilization Ordinance and the Mello Act, as well as other applicable laws, in order to control and to stop the further erosion of Venice Coastal Zone housing, especially affordable housing, and the resulting permanent damage to the Venice neighborhoods;
12. Appeals for Venice Coastal Zone projects shall be accepted by City Planning via fax, and with no charge, during the period of the ICO. In addition, the City Council Office shall pursue a doubling of the time now provided for appeals of SPP's, city CDP's to the West L.A. Area Planning Commission, the city CDP's to the state Coastal Commission district office and state CDP's to the Coastal Commission.
 13. No later than 60 days after the effective date of this ICO, the VNC MSC Committee and the VNC LUPC shall work together to provide a recommendation to the VNC on an overall Floor Area Ratio, and any other standards or policies deemed advisable, and the VNC shall make a final recommendation that will become a part of this ICO.
 14. The Council Office shall institute a process for receiving concerns re: breach of City or State process or policy regulations, for the purpose of early resolution, in order to avoid unnecessary work by either government officials or citizens, which process would include consideration of removal from participation in future Venice Coastal Zone projects by any Zoning Administrator who has abused their discretion with respect to the Venice Coastal Zone and/or who a fair representation of Community members believe/perceive has abused their discretion with respect to the Venice Coastal Zone.
 15. The Councilmember's office shall request/assign representatives from the City Attorney's office, LADBS, and City Planning to be available to the VNC LUPC members as needed for legal/technical assistance on their VNC case work, which representatives are very familiar with the Coastal Zone requirements, are in support of State and City laws for protection of Venice as a Special Coastal Community, and are in support of assuring that the LCP is not prejudiced, impeded or negated and that the ultimate, certified LCP adheres to Chapter 3 of the Coastal Act.
 16. The VNC, the City Council Office and the state Coastal Commission district office shall work together, as is their duty, to evaluate the cost to the State and City--and thus to the Citizens who pay for the functioning of the State and the City, as well as the cost to the Citizens, of the current situation where the Citizens are clearly and significantly concerned as to the quality of decisions being made by City Planning and about various practices of City Planning and LADBS, all of which are causing both the Citizens and the state Coastal Commission Executive Director to file an extraordinary level of appeals of City determinations, which in turn results in even more work for all; and to make recommendations regarding how to make the changes necessary in order to reduce that significant cost, which is borne in its entirety by the City and the State's Citizens.
 17. The VNC, the City Council Office and the state Coastal Commission district office shall work

together, as is their duty, to provide a recommendation on how the City, and specifically City Planning and LADBS, can perform their duties such that the burden of protecting, maintaining and improving the quality of life of the citizens, as per existing City and State law, does not fall on the citizens, thus significantly reducing their quality of life, but rather on the citizens' government, which derives its power from its citizens, and which exists in order to protect, maintain and improve its citizens' safety, security and quality of life.

INTERIM CONTROL INTERNAL CONTROLS

It should be noted that many of the provisions in this section of the ICO have already been recommended by the VNC to the City and/or Coastal Commission in the form of recommendations approved by VNC Board.

18. All State Coastal Commission actions/determinations shall be disclosed on ZIMAS, along with the related City actions/determinations, so that there is one place for a given Venice Coastal Zone project that lists all applicable permits/authorizations.
19. The West L.A. office of LADBS (not to be confused with City Planning) shall be the ONLY office permitted to process Venice Coastal Zone Building Permits. All Venice Coastal Zone Building Permits shall be processed according to a Building Permit clearance applicability matrix that shall be proposed by City Planning, with signoff from the Council Office, the Coastal Commission Senior Deputy Director, and a written recommendation of support from the VNC. This matrix shall be updated on an ongoing basis for any necessary changes, including closure of "loopholes" by City Planning, with signoff from the Council Office, the Coastal Commission Senior Deputy Director, and a written recommendation of support from the VNC.
20. LADBS Inspectors for the Venice Coastal Zone shall rotate every 2-3 months, and all Building Permits for the past one year, as well as all Building Permits for the duration of this ICO, as well as related clearances and City Planning determinations shall be reviewed by a committee consisting of 2 members of the VNC Land Use & Planning Committee (LUPC), 1 member from the Council Office, 1 member from City Planning and 1 member from the state Coastal Commission, for compliance with the VCZSP, the Coastal Act, the Mello Act, the LUP, this ICO (where applicable), and the LAMC, with a recommendation to be made for Coastal Commission action for any actual or potential problems or violations noted by one or more of the committee members.
21. The Department of Transportation (DOT) shall prepare a traffic study for all Venice Coastal Zone commercial developments; in addition, the DOT shall be instructed by the Council Office that they must put adequate controls in place to assure that they do not accept In Lieu Parking Fee payments until all final clearances are in place for a given project, and that they must return any fees that they have inadvertently received for which the related permit has not been finalized and issued.
22. Procedures shall be put into place for an independent review and physical sign off for Venice projects by a LADBS Plan Check Supervisor in order to assure that the construction plans

presented to Plan Check are the same as those plans approved in conjunction with the CDP and other determinations.

23. Procedures shall be put into effect by the City that will assure that determinations or approvals made and plans provided to the Coastal Commission are the SAME as what was approved by the City, including the West L.A. Area Planning Commission; and procedures shall be put into effect by the state Coastal Commission's district office that will assure that determinations or approvals made and plans provided to the Coastal Commission are the SAME as what was approved by the City, including the West L.A. Area Planning Commission.
24. All City officials and employees in City Planning, LADBS, the City Attorney's office and the Council Office who are involved in the Venice Coastal Zone land use and planning process, as well as all VNC Board members and LUPC members, shall be provided with annual training on the Coastal Act, the Mello Act, Density Bonus regulations, Small-Lot Subdivision regulations, the General Plan, the Venice Community Plan, the LUP, the VCZSP, the Oxford Triangle Specific Plan, the Los Angeles Coastal Transportation Corridor Specific Plan, the LAMC, and all provisions of the City of L.A. Code of Ethics, with appropriate testing on completion of training.
25. A system of fines shall be designed and put into place by the Council Office that will strongly discourage applicants from not following the city or state law and procedures with respect to Venice Coastal Zone development.
26. All approval signatures for Venice Coastal Zone developments shall be required to be accompanied by a typed or printed name so that it is possible to identify the approval signature, including and especially for CEQA cases; and a copy of all "Director of Planning" delegated authorities for City Planning's approval of Venice Coastal Zone projects shall be provided to the VNC, the City Council Office and the Coastal Commission Senior Deputy Director.
27. The VNC, the City Council Office, the state Coastal Commission district office shall be provided "read only" access to all City Planning and LADBS systems.
28. LADBS shall correct the ZIMAS systems database for all miscoding with respect to Dual Permit Jurisdiction Coastal Zone classification, which shall be determined according to the maps prepared by the Coastal Commission's Executive Director, as required by the California Administrative Code, which maps for Venice are included as Exhibits 1a and 1b of the VCZSP; and LADBS shall also assure adequate systems access controls over any future changes.
29. For all Venice Coastal Zone CEQA cases, a second review by an independent group that reports to the Mayor shall be performed at the time of CEQA case-type categorization in order to assure proper initial classification, including and especially the accuracy of any exemptions or exclusions, and at the time of final review of the CEQA report, to assure the appropriate categories have been selected for review, to assure that mitigating factors are adequate, and to assure that the cumulative environmental impact, including for the MSC aesthetics and the land use categories, on the existing surrounding neighborhood, the Subarea, and the Community of Venice, is specifically, thoroughly, accurately, and adequately addressed. Procedures for filing of CEQA appeals shall be clearly and completely stated on all City decisions that give rise to the CEQA appeal right.

30. At the time of the initial filing of any application, a Venice Community Planning (VCP) form shall be completed by City Planning for every Venice Coastal Zone project, which form shall have a section for clear designation of all required case types and the case number assigned for each (prefix, year, # of case and suffixes for each entitlement), including the state-required CDP. The VCP form shall make it clear that all cases for the project shall be filed and processed together. The VCP form shall be provided to the VNC, the City Council Office, and the state Coastal Commission district office, and shall also be available online via hyperlink on the City Planning website, within 48 hours of preparation. If any of those three bodies have questions regarding, or disagree with, the initial case coding or classification used, there shall be a process for requesting a change, with the Council Office making the final decision.
31. The City Planning Department shall include the accurate size of the project, including lot size, square footage of the building with and without the garage, and height of the proposed structure, including the height of the non-contiguous heights if there is more than one peak, and an indication of whether the roof is a varied roofline or a flat roof, in the Project Description field, including for purposes of the CNC report; and such Project Description shall be consistent for any one project between all City Planning and LADBS reports/systems.
32. All Venice Coastal Zone and State Coastal and City Determinations and notices shall be provided to the VNC, the City Council Office, the state Coastal Commission district office, including ALL exhibits, immediately upon issuance, both in hard copy and electronic form, as follows:
 - a. City Planning (including specifically the Advisory Agency as well as all other Departments of City Planning) shall treat each of the VNC, the City Council Office, and the state Coastal Commission district office, as an "interested party" for all Venice-related matters, and shall provide them all City Planning Notices (including "environmental publication notices"), case documents (both hard copy & digital copy, if provided by applicant) and related correspondence, Determinations (including all Exhibits), Environmental Reports, and other Policy Planning (including LCP) related reports or correspondence. For the VNC, such documents shall be provided directly to the VNC President, the VNC Vice-President, and the Land Use & Planning Committee Chair, upon receipt, issuance or approval, by both email and U.S. mail, at the email and postal addresses as per the then-current VNC website (currently president@venicenc.org, vicepresident@venicenc.org and chair-lupc@venicenc.org, respectively; and PO Box 550, Venice, CA 90294).
 - b. The Coastal Commission shall treat each of the VNC, the City Council Office, and City Planning as an "interested party" for all Venice-related matters, and shall provide them copies of all related documents, including but not limited to State CDPs issued, revocations and any other decision/opinion/approval/denial forms or letters, City CDP Notices of Determination received, notices of the start and end of Coastal Commission Appeal periods, State CDP, Administrative & other permits, and any other Venice Coastal Zone-related applications, reports or correspondence. For the VNC, such documents shall be provided directly to the VNC President, the VNC Vice-President and the Land Use and Planning Committee Chair, upon receipt, issuance or approval, by both email and U.S. mail, at the email and postal addresses as per the then-current VNC website (currently president@venicenc.org, vicepresident@venicenc.org and chair-lupc@venicenc.org, respectively; and PO Box 550, Venice, CA 90294).
 - c. In addition, within 10 days of the decision date, all case determinations shall be made available by hyperlink on the City Planning and the ZIMAS systems, and cases shall be searchable on the City Planning website using both address and case number.

33. Any and all agreements with tenants within 2 years prior to an application for a demolition or conversion of a property and for 2 years after issuance of the related Certificate of Occupancy shall be provided by Applicant to HCID and such agreements shall be reviewed by HCID to assure that, in addition to all of the other requirements, the tenants are clearly and conspicuously notified of the Mello Act and their rights thereunder and that such agreements do not result in waiver/release of certain key tenant rights, and further that any agreed notice for termination of the tenant's occupancy is not for a period of less than 6 months.
34. It shall be written into every job description of every City official and employee involved with Affordable Housing in the Venice Coastal Zone, and into every procedure and policy related to Affordable Housing in the Venice Coastal Zone, that the number one priority of the City and the Community of Venice is to protect, maintain and increase affordable housing in the Venice Coastal Zone. The laws are in place to support this and all involved in or responsible for these processes shall work to enforce them with the highest integrity, including timely, vigorous and ongoing review for the purposes of closing of any loopholes or stopping any workarounds noted, including those reported to them by the VNC.
35. All Public Hearings for Venice projects shall be held IN Venice or within a 3- mile radius of Venice, including City Planning Commission (when applicable) and West L.A. Area Planning Commission hearings, in order to facilitate increased public participation by Venice residents.
36. A procedure shall be installed such that VNC questions and concerns, including document requests, are addressed timely and that City Planning personnel will work with the VNC representatives with open lines of communication, in order to avoid community appeals and the resulting waste of Citizen-funded resources.
37. The VNC MSC Ad Hoc Committee and the VNC LUPC shall be assigned to work together to identify all completed projects in the Venice Coastal Zone that were not approved in consideration of the General Plan's MSC policies contained in the Venice Community Plan and LUP and thus that should not be used as precedents or considered as "part of the existing surrounding neighborhood" streetscape for purposes of determining compatibility of MSC for future projects. Such list will be provided to City Planning, and the state Coastal Commission district office, with a copy to the City Council Office, for use in analysis of projects.
38. VNC Land Use and Planning-related recommendations shall be disclosed in a "standing" section of all related City Staff Reports and Determinations, called "Neighborhood Council Recommendation." Along with such recommendations, if the Neighborhood Council recommendation has not been followed, the City "decision maker" shall provide an explanation.
39. Guidelines for CDP Findings and SPP Findings shall be prepared by the VNC MSC Committee, in coordination with the state Coastal Commission district office, and shall be reviewed/recommended for approval by the VNC, City Planning and the Council Office, for the purpose of standardizing the requirements for providing evidence for each Finding, including the definition of "immediate surrounding neighborhood," and including the clarification of "materially detrimental to adjoining lots or the immediate neighborhood," along with guidelines for preparation of Streetscapes and other analyses used in making conclusions on the compatibility of the project with the existing neighborhood for MSC.