

**D. PROJECT IMPACTS:** The relationship of the development to the following items must be explained fully. Attach additional sheets if necessary.

1. Will the development extend onto or adjoin any beach, tidelands, submerged lands or public trust lands?

No, the proposed development will not extend onto or adjoin any beach, tidelands, submerged lands, or public trust lands. The project site is separated from Venice Beach by Ocean Front Walk, a fifty-foot wide non-vehicular public ROW within a built urban environment.

2. Will the development maintain, enhance, or conflict with public access to the shoreline and along the coast?

The proposed project will enhance public access to the shoreline along the coast by providing high-demand retail opportunities and Very Low Income affordable dwelling units in a high-needs area. The proposed project will not alter any public access or public roadway.

3. Will alternatives to private vehicle use be provided or facilitated? How will the development affect traffic on coastal access roads?

Yes, the project will provide alternatives to private vehicle use. The proposed project includes 2 ground floor retail units and 16 for-rent residential units including 2 units being deed-restricted for very low income households. Overall, the proposed project is 12.5% affordable.

The project will provide a total of 16 parking spaces, which is equivalent to 1 parking space per dwelling unit. Two of the 16 parking spaces will be reserved for car share vehicles, which reduce the need for building residents to use privately owned vehicles.

24 long-term bicycle parking spaces will be provided in a secure bicycle room located in the at-grade parking garage with direct access to the rear alley. 6 short-term bicycle spaces will be provided in the side yard directly on Park Avenue, which is classified as an automobile-free walk street.

Section 30253 of the Coastal Act states, in part:

*New development shall...Minimize energy consumption and vehicle miles traveled..*

Studies have shown that having functional and conveniently located long and short-term bicycle parking in a multifamily building encourages the use of bicycles as an alternative form of transportation to automobile. In particular, this is true in a community like Venice which is easily traversable by bicycle and is

located in close proximity to the Venice Beach bicycle path as well as bike lanes along Main Street, Windward Avenue, and Venice Boulevard that give access to a wide array of community-facing commercial and employment resources.

The subject property is located approximately half a mile from the intersection of Ocean Front Walk and Venice Boulevard. Mobility 2035 identifies this section of Venice Boulevard as a “Comprehensive Transit Enhanced Street”, which will receive a Tier 1 protected bicycle lane as part of the City’s ongoing effort to enhance its transportation networks.

4. Is the development proposed within or in close proximity to an existing developed area? Will it be visually compatible with the character of surrounding areas? If in a special community or neighborhood, how will it protect the unique local character?

Yes, the project is located in the North Venice subarea of the Venice Coastal Zone Specific Plan in an area identified by the Venice LUP for commercial uses. Its proposed height is 39 feet with a Floor Area Ratio of 1.62:1.

The proposed project will be visually compatible with other mixed-use structures in the surrounding area, which are mostly two and three stories. The proximate neighborhood is characterized by commercial and mixed-use (commercial and residential) structures similar to the proposed development in density and scale.

#### Height, Density, and Use

The surrounding area is made up of a range of low-mid density residential and commercial uses, including two-, three-, and four-story apartment houses, condominiums, and office buildings. Most of the buildings along Ocean Front Walk contain ground floor commercial uses with one to two levels multifamily residential on top. Ocean Front Walk buildings range in height from 30 feet to 50 feet. The buildings just east of Speedway Alley include residential buildings ranging from two to four stories and 25 to 50 feet in height.

The buildings along Ocean Front Walk range in Floor Area Ratio from 0.83:1 to 1.76:1. Proximate buildings along Speedway Alley range in Floor Area Ratio from 0.85:1 to 2.65:1. The mixed-use buildings along Ocean Front Walk range in residential unit count from two units up to eighteen units. Residential buildings along Speedway Alley adjacent to the proposed development range in unit count from one-unit single-family homes to eighteen units.

Like much of Venice, buildings in the vicinity of the subject property are generally reflective of the period in which they were built. A survey performed by Breakform Architects of the area surrounding the subject property demonstrates the range in development type and scale. Mixed-use properties constructed in or after 2000 generally have a Floor Area Ratio of 1.5 or greater, reflecting increased

demand for residential units and a sustained market for visitor-facing commercial uses.

The desire of the LUP to spur affordable and market rate residential uses while reducing vehicle miles traveled (VMT) is also consistent with the following goals of the Venice Community Plan (adopted 2000):

- Objective 1-1 “To provide for the preservation of the housing stock and its expansion to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area...”
- Objective 2-1 “To reduce vehicular trips and congestion by developing new housing in proximity to services and facilities.
  - Policy 1-2.2. “Encourage multiple-family residential development in commercial zones.”
- Objective 1-4 “To promote the adequacy and affordability of multiple-family housing and increase its accessibility to more segments of the population.”
  - Policy 1-4.2 “Ensure that new housing opportunities minimize displacement of residents”

In order to provide two affordable dwelling units (12.5% of the proposed units), the project is requesting the following development incentives:

1. A 9’ increase in allowed height to allow one additional story, consistent with LAMC 12.22 A 25 “on menu” incentives.
2. A 20% reduction in required northerly side yard setback.
3. A 20% reduction in required southerly side yard setback.
4. An 8% increase in allowable Floor Area Ratio.
5. A reduction in parking to allow 1 space per and zero parking spaces for the commercial portion.
6. An increase in allowable number of roof access structures.

Given the extremely high cost of land in Venice and the (currently) ballooning cost of construction, the additional 4<sup>th</sup> story and reduced setbacks is necessary for the provision of affordable units.

Section 30604 of the Coastal Act states, in part:

*(g) The Legislature finds and declares that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone.*

*(h) When acting on a coastal development permit, the issuing agency, or*

*the commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state.*

Policy I.A.13 (Density Bonus Applications) of the Venice LUP states, in part:

*... In order to encourage the provision of affordable housing units... the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915 ...*

The proposed project is a mixed-use building that replaces a vacant lot with two commercial units and sixteen residential units, including two units reserved for Very Low Income households. The project will provide sixteen parking spaces, two of which will be reserved for car share dedicated to the residential tenants, as well as 30 long- and short-term bicycle parking spaces and is situated in an area highly concentrated with services and facilities.

#### Parking

The proposed project will provide 16 onsite parking spaces, or 1 per residential unit and no parking spaces for the two commercial units. The proposed project also provides 24 long-term and six short-term bicycle parking spaces. In order to achieve the highest public accessibility, the short-term bicycle parking will be located beside the building in the public right-of-way on Park Avenue which is identified as a walk street in the Venice Coastal Zone Specific Plan. This is consistent with Section 30252 of the LUP because it is: providing commercial facilities within or adjoining residential development, minimizing the use of coastal access roads; providing non automobile circulation within the development; providing adequate bicycle parking facilities which can be used as substitute means of serving the development and connect with public transportation; not a high intensity use that needs its own public transportation enhancements; and assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the development plans with the provision of onsite recreational facilities to serve the new development, including 1,800 square feet of usable open space.

Furthermore, the planned commercial establishment types are not of the nature that would prompt beachside visitation with the sole purpose of patronizing the retail business contained therein. It is, therefore, not expected that visitors to the commercial units will require on-site parking at the proposed development.

5. Describe how grading will be conducted so as to minimize alterations to land forms. If on a bluff or in an area of high geologic risk, how will the project design assure stability and minimize erosion?

No re-grading of coastal lands will occur. The proposed project is the construction of 16 apartment units and two commercial units with an at-grade garage. The garage will not alter current grade.

6. Does the development involve diking, filling or dredging of open coastal waters, wetlands, estuaries or lakes? What alternatives are available? How will the adverse environmental effects of this be minimized?

No, the project does not involve these activities.

7. Is the proposed development coastal-dependent? Will it displace any coastal-dependent facilities?.

No, the project is not coastal-dependent and will not affect coastal-dependent facilities.

8. How will the development affect biological productivity of coastal waters?

The project will not affect biological productivity of coastal waters.

9. Is the development proposed near sensitive habitat areas, parks or recreation areas? How will the project design prevent adverse environmental impacts on these areas?

Yes, the project is near Venice Beach which is a park and recreation area. The project proposes reduced parking, dedicated car share parking, and short- and long-term bicycle parking encouraging the use of alternative modes for park visitors. Furthermore, the development proposes community-facing retail opportunities including a walk-up take out-only restaurant (no drive-through window is proposed), further discouraging private vehicle use, which causes adverse environmental impacts and detracts from the unique assets offered by natural world nearby.

10. Is the development proposed within or adjoining land suitable for agriculture? Will it convert agricultural land to another use? How is the project consistent with continued local agricultural viability?

The project is being built in an urban environment that is not suitable for agriculture.

11. What water conservation features are included in the project?

Project will employ LID (low impact development) systems as a way to mitigate storm water runoff and maximize water efficiency and retention for landscaping purposes.

12. What energy conservation features are included in the project?

Project proposes 250 square feet of solar photovoltaic system on the rooftop

13. Describe current location of service lines for necessary utility connections and any extensions or relocations of service lines.

Power poles serve the site. Adequate existing sewer connections along Ocean Front Walk serve the site.

14. Will the development protect existing lower cost visitor and recreational facilities? Will it provide public recreational opportunities?

The proposed development project includes two ground floor retail units that are planned to contain visitor-facing retail and restaurant opportunities at costs appropriate for the existing market, enhancing the current visitor and recreational facilities.

15. Will the development protect or provide low- and moderate-income housing opportunities? Will it displace low- or moderate-income housing?

The project will provide two units reserved for Very Low Income households and is being developed on a currently vacant parcel.

16. Is the development proposed within or near a known archeological, paleontological or historic site? How will impacts on such sites be minimized?

No, the proposed development is not within or near those areas.

17. List all permits, permissions or approvals required from public agencies for this development and indicate those already applied for or granted.

(1) Coastal Development Permit, (2) Conditional Use Permit for a Density Bonus Greater Than 35 Percent, (3) Project Permit Compliance for the Venice Coastal Zone Specific Plan.

18. Is the project located:

1) Between the sea and the first public road paralleling the sea? YES

- 2) Within 300 feet of the inland extent of any beach? YES
- 3) Within 300 feet of the top of the seaward face of any coastal bluff? NO

15. **JUSTIFICATION**<sup>[1]</sup><sub>[SEP]</sub> Justify the proposed project by addressing the following criteria:

**a. The development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code.)**

Shoreline Access

The subject property is located on a privately-owned parcel between the shoreline and the nearest public road in the California Coastal Zone. The property is adjacent to Park Avenue, a qualified “walk street” in the Venice Coastal Zone Specific Plan document, which is a conduit for public access to the shoreline via non-motorized modes. As such, the proposed development will not interfere with or obstruct any access to coastal resources or ocean use.

Recreation and Visitor Facilities

The project site is adjacent to Venice Beach, which is separated from the proposed development’s frontage by the 50-foot wide Ocean Front Walk. The proposed development will provide visitor-facing retail opportunities that will enhance the surrounding existing commercial establishments and provide opportunities for retail and restaurant commerce for visitors to recreational facilities.

Water and Marine Resources

The proposed project will not impact any marine resources. The project is above the high tide line and will not have any effect on the Pacific Ocean, or on the sandy inter-tidal zone.

Environmentally Sensitive Habitat Area

The project is within a fully developed commercial and residential neighborhood with no such areas nearby.

**b. The permitted development will not prejudice the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

The proposed project will conform to the Venice Community plan and the Venice

Coastal Zone Specific Plan.

The mixed-use project, including sixteen proposed apartment units with two units reserved for Very Low Income households, is the highest and best use for this lot. The commercial units will provide visitor-facing retail to enhance the educational and economic strength of the recreational facilities and the for-rent housing units will provide a wider range of residential opportunities, which is particularly important in the “high resource” coastal zone.

**c. The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in light of the individual project in making its determination.**

The proposed project does not conflict with any of the guideline provisions for the subject area.

**d. The decision of the permit-granting agency has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625 (c) of the Public Resources Code.**

The California Coastal Commission Public Resources Code is concerned with improving recreational opportunities for the public and the impacts to marine resources or sensitive habitat.

Approval of the proposed project through the granting of a Coastal Development Permit would not establish a precedent that deteriorates Local governments or port governing bodies in their future decisions to protect the beach or coastal waters and therefore should not conflict with any action or decision made by the California Coastal Commission pursuant to Section 30626(c) of the Public Resources Code.

**e. If the development is located between the nearest public road and the sea of shoreline of any body of water located within the coastal zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

The proposed project is located between the nearest public road (Speedway Alley) and the sea or shoreline of any body of water (the Pacific Ocean). Section 30211 of the California Coastal Act requires developments not to interfere with the public’s right of access to the sea. Section 30212 requires new development projects to provide access from the nearest public roadway to the shoreline and along the coast except where adequate access exists nearby. Section 30213



encourages the provision of lower cost visitor and recreational facilities. The proposed development is situated on a private parcel that previously contained a two-story commercial office building. The parcel sits adjacent to Park Avenue, a qualified “walk street” in the Venice Coastal Zone Specific Plan document, which is a conduit for public access to the shoreline via non-motorized modes. The development proposal includes public-facing retail opportunities including take-out only pick-up window dining and tourist-intended retail, both of which will be priced to appeal to the wide range of visitor incomes and tastes. As such, the proposed development does not interfere with, but enhances, the public’s right of access to the sea.

Article 3 of Chapter 3 of the California Coastal Act protects coastal areas and oceanfront land for water-oriented activities by prioritizing commercial recreational facilities, aquaculture, and boating facilities these lands. The proposed project sits on a privately-owned parcel within a fully developed area separated from the shoreline by the beach and a 50-foot wide public right-of-way. It is surrounded on three sides with commercial and residential development as well as public uses such as roadways and sidewalks. As such, the proposed project is not planned for land prioritized for recreational facilities, aquaculture, or boating facilities.