



Venice Neighborhood Council

LAND USE AND PLANNING COMMITTEE

PO Box 550, Venice, CA 90294 | www.VeniceNC.org

Email: Chair-LUPC@VeniceNC.org



Land Use & Planning Committee (LUPC)

STAFF REPORT--**DRAFT**

December 18, 2025

City Case No:	CPC-2025-1561-DB-CU2-CDP-MEL-SPPC-HCA
CEQA Case No:	ENV-2025-1562-EAF (status?)
Related City Case No(s):	ZA-2021-406-CDP-SPP-MEL-ZV-ZAA and DIR-2017-3789-CDP-SPP-MEL (expired?)
Address of Project:	17-21 Jib Street
Applicant/Property Owner:	Lederman Family Trust & Joshua K. Lederman/17 Jib Company LLC
Applicant's Representative:	Jesi Harris, Brian Silveira & Associates
Standard of Review:	Coastal Act, with certified Land Use Plan (LUP) as guidance State Density Bonus Law Mello Act, Housing Crisis Act (SB 8) and related state housing laws Conditional Use Specific Plan Project Permit Compliance
Coastal Zone:	Dual Permit Jurisdiction
City Hearing:	not yet scheduled
Email for City Planner:	Michelle.Gallarza@lacity.org
LUPC Staff assigned:	David Turnbull & Robin Rudisill

Project Description:

Demolition of residential improvements on two walk street lots: 4225-011-009 (after the fact approval of demo of SFD) & 4225-011-011 (5-unit residential structure), and construction of a 5-story, 59', 25-unit residential structure, including 5 units reserved for Very Low Income (VLI) households, & 1 unit reserved for Lower Income (LI) households, with Density Bonus incentives and waivers.

Key project characteristics from the current plans include

- New construction: 25-unit, 5-story apartment building with parking on the ground floor
- Lot area: 7,385.67 sq ft, consolidation of 3 (4?) lots into two existing parcels (Lots 9 & 11, Block G, Ocean Strand Tract)
- Zoning: R3-1; Specific Plan: Venice Coastal Zone (VCZSP), certified Land Use Plan (LUP), Marina Peninsula subarea
- Stories: 5 above grade, **with a substantial roof deck over the fifth floor**
- Height:
 - “Zoning height” requested: 59 feet (measured per LAMC from the centerline of Jib Street)
 - Actual structure to roof deck: ~69'-10"
 - **Top of guardrail / parapet: ~73'-4" to 73'-10"**
 - Venice Coastal Specific Plan height limit for walk street structures in Marina Peninsula Subarea: 28 feet – applicant seeks a 31-foot increase, more than double the height allowed by the VCZSP and LUP, via Density Bonus incentive.
- Floor Area Ratio (FAR):
 - Allowed by zoning: 3:1 (4,992 sf buildable area × 3 = 14,976 sf)
 - Provided: 18,629 sf (FAR 3.73:1 – a 26% increase)
- Units / Affordability:
 - Total units: 25
 - 19 Market Rate units
 - 5 Very Low Income (VLI) units
 - 1 Low Income unit
 - Base density: 11 units, based on lot area (including ½ alley) and R3 density formula
- Open Space:
 - Common open space: 0 sq ft
 - Private open space (balconies/roof decks): 2,953 sq ft provided vs. 2,675 sq ft required
 - All usable open space is elevated; no ground-level common open space on the walk street.
- Parking:
 - Required by VCZSP and LUP for 25 units: 57 spaces (before any DB reductions)
 - Provided: 9 spaces (3 standard, 5 compact, 1 ADA; 6 spaces in tandem positions)
 - **This is 48 fewer spaces than the required 57).**
- Bicycle Parking: 28 long-term and 20 short-term spaces (exceeding minimum requirements)

The project is located on the Jib Street walk street, within a highly scenic, historic walk street neighborhood that the LUP identifies as part of a Special Coastal Community and a “highly scenic coastal area,” where the height limit is 28 feet and where the scale of development is required to comply with height limits, setbacks, and building massing standards under LUP Policy I.D.3.

Motion:

The Venice Neighborhood Council opposes the City’s approval of the project at 17-21 Jib Street and recommends that the project be denied in its current form for failure to comply with the State Density Bonus Law, the Coastal Act, the certified Venice Land Use Plan, and the Venice Coastal Zone Specific Plan.

The VNC further recommends that any revised project at this site:

- **Comply with the 28 foot height limit for structures on walk streets in the Marina Peninsula Subarea of the Venice Coastal Zone;**
- **Provide substantially more on-site parking to protect coastal access and neighborhood livability;**
- **Respect the scale, massing, and character of the historic Venice walk streets that have been recognized in the LUP as a highly scenic coastal area and key element of Venice’s designation as a Special Coastal Community; and**
- **Demonstrate that any Density Bonus incentives and waivers are the minimum necessary to physically accommodate the affordable units, in a manner that is fully consistent with Government Code §65915(m) and the Coastal Act.**

Moved by:

Seconded by:

Vote:

LUPC Discussion/ Neighborhood Concerns (Summary)

The neighbors on and around the Jib Street walk street and Speedway have expressed strong opposition to the project. Key themes include:

- **Coastal Access & Parking:** severe concern that providing only 9 on-site spaces where 57 are required by the VCZSP and LUP will push residents and their visitors onto already overburdened walk street, Speedway Alley, and alley parking, reducing parking available for coastal visitors and beach access and worsening circulation and safety on very narrow rights-of-way.
- **Height, Massing, and Walk Street Character:** alarm that a 5-story, 59-foot building (with actual structure and guardrails over 70 feet high) will loom over the narrow walk street, dwarfing surrounding buildings and fundamentally altering the scale and character of this historic, pedestrian-oriented environment that the LUP identifies as a highly scenic coastal area and Special Coastal Community.

- Cumulative Effect and Precedent: concern that granting a 31-foot height increase (more than double the height allowed by the VCZSP and LUP), major yard reductions, and a drastic parking waiver, plus consolidation of 3 (4?) lots, will trigger a wave of similar proposals on other Venice walk streets, cumulatively undermining coastal access, neighborhood character, and the Special Coastal Community status of Venice.

Entitlements / Requests

Per the project information in the plans, the applicant is seeking:

1. Conditional Use for Density Bonus (LAMC 12.24 U.26 & F)
 - Density Bonus for a project where the density increase exceeds the 35% “by-right” maximum in LAMC 12.22 A.25.
 - 25 for-rent dwelling units in lieu of 11 permitted base units is a 127% or 15 unit increase vs the “by right” 35%, with 5 VLI units and 1 Low Income unit.

On- & Off-Menu Incentives:

- Up to 26% increase in FAR to allow 18,882 sq ft in lieu of 14,976 sq ft (3.73:1 vs. 3:1).
 - 20% reduction in front yard (12’ instead of 15’). (must conform to walk street yards requirements)
 - 17% reduction in rear yard (12.5’ instead of 15’).
 - 31-foot increase in height (59’ instead of 28’ allowed for walk street structures in the Marina Peninsula Subarea under VCZSP §10.D.2.b).
2. Waivers of Development Standards:
 - 38% reduction in east side yard (5’ instead of 8’).
 - 38% reduction in west side yard (5’ instead of 8’).
 - Parking waiver: 9 spaces (6 tandem) in lieu of 57 spaces required by VCZSP §13.D.
 - Parking stall type waiver: five compact and three standard stalls instead of one standard space per unit (LAMC 12.21 A.5.c).
 - Lot consolidation waiver: allow consolidation of 3 (4?) lots instead of the maximum two residential lots permitted by VCZSP §9.A.1.
 3. Venice Coastal Zone Specific Plan – Project Permit Compliance
 - For the construction of a maximum 25-unit apartment building on a walk street (LAMC 11.5.7 C.2 and VCZSP §7.H).
 4. Coastal Development Permit (LAMC 12.20.2 G)
 - CDP in the Dual Permit jurisdiction to allow construction, use, and maintenance of the proposed project.

Coastal Act & LUP Consistency Analysis

1. Coastal Access & Parking

Key Coastal Act and LUP policies:

- Coastal Act §§30210, 30211, 30212, 30252: protect and maximize public access to the coast and public recreational opportunities, including through adequate parking.
- Coastal Act §30250 & §30252: require new development to be located and designed so as not to have significant adverse impacts on coastal resources, including parking and access.
- LUP Policies for Parking & Coastal Access: direct that residential parking be provided on site in order to protect on-street parking availability for coastal access.

Here, the VCZSP requires 57 off-street parking spaces for 25 units on this site.

The applicant proposes only 9 spaces in an area:

- With very high parking demand due to proximity to the beach and the walk streets serving as pedestrian routes to the shoreline; and
- Where walk streets and the Speedway Alley already experience intense competition between residents, visitors, service vehicles, and delivery vehicles for limited curb space.

A reduction from 57 to 9 spaces is a 48 space or approximately 84% reduction in the on-site parking required by the VCZSP. Even with robust bike parking, this magnitude of reduction is fundamentally different from other Venice Density Bonus projects, such as the 657 Sunset Ave Density Bonus project, where:

- That project qualifies for AB 2097 parking relief due to proximity to a Major Transit Stop;
- The project site was a corner lot situated on very wide, 60' driving streets;
- That site was farther from the beach; and
- That applicant still chose to provide 11 spaces, supported by a detailed parking study.

In contrast, at 17–21 Jib Street:

- The project is steps from the sand on a very narrow walk street that functions as a key pedestrian and bicycle access route to the shoreline.
- On-street parking in the immediate area directly supports coastal recreation for the general public, for both the beach and the Canals/Ballona Lagoon.
- The applicant is seeking to practically eliminate on-site parking relative to VCZSP standards in order to pack 25 units and a five-story building onto a very small, sensitive walk street site.

Because the walk streets and adjacent streets provide coastal visitor parking as well as general neighborhood parking, such a drastic reduction in on-site parking would foreseeably:

- Displace resident and guest cars into spaces now used by beach visitors;
- Force more drivers to circulate in search of parking, increasing congestion and conflicts on narrow, pedestrian-oriented rights-of-way.
- Make it significantly harder for the broader public to spontaneously access this portion of the coastline; and

- Undermine the City's and Coastal Commission's longstanding policy of protecting coastal access through adequate parking in Venice.

Conclusion - Coastal Access & Parking

On this coastal-proximate walk street, the requested parking waiver – combined with the substantial increase in units – is not consistent with Coastal Act coastal access policies and the LUP/VCZSP framework. The project, as proposed, would likely have significant adverse impacts on coastal parking and access and therefore fails to conform with Coastal Act Chapter 3.

2. Scenic and Visual Resources / Special Coastal Community Character

Key policies:

- Coastal Act §30251: requires that the scenic and visual qualities of coastal areas be considered and protected as a resource of public importance and that permitted development be sited and designed to protect views to and along the ocean and scenic coastal areas and to be visually compatible with the character of surrounding areas.
- Coastal Act §30253(e): requires protection of special communities and neighborhoods that, due to their unique characteristics, are popular coastal visitor destinations.
- LUP Policy I.D.3 (Walk Streets/Highly Scenic Coastal Areas): identifies the Venice walk streets as a highly scenic coastal area and requires that the scale of development comply with height limits, setbacks, and building massing standards.
- The LUP's definition of "Special Coastal Community" describes areas recognized as important visitor destinations, with distinctive cultural/historic/architectural heritage, strong pedestrian and bicycle orientation, and high visual attractiveness – the Venice walk streets clearly satisfy this definition and their character and scale must be protected as a Coastal Resource. See ADDENDUM for the applicable LUP Walk Street Policies with which the project must comply but does not.

The proposed project is fundamentally out of scale with these policies:

- It seeks a 31-foot height increase, from a 28-foot limit to 59 feet – more than double the walk street height standard in the Marina Peninsula Subarea, before considering the additional physical height of the roof deck, guardrails, and parapets (over 70 feet).
- It introduces five full floors of residential units, plus a large roof deck, into a narrow walk street context historically characterized by much lower-scale buildings, generous open space, and a highly intimate, pedestrian-oriented character.
- Side yards, front yard, and rear yard are all significantly reduced via incentives and waivers, further increasing bulk and mass right up against the walk street and alley – **compromising fire department access to the upper levels from the side-yards.**

As compared to the 657 Sunset Ave Density Bonus case, the LUPC concluded that the project – though tall – kept the fourth floor significantly stepped back, omitted a roof deck, and was located at the corner of two 60-foot rights-of-way, which softened its visual impact and allowed it to be viewed as compatible with surrounding character.

At 17-21 Jib Street, the opposite is true:

- The walk street is extremely narrow, intentionally designed as a pedestrian greenway leading to the sand.
- The project involves the demolition of one of the earliest and more remarkable residential buildings on the Marina Peninsula, constructed in 1906, in the 'craftsman' style. This building, one of only a few structures from the earliest period of development in and around Venice, is not yet eligible for listing as an historic building but makes a significant contribution to the character of Jib Street, and the Marina Peninsula as a whole. The applicant's 'expert' on historic buildings focuses on anecdotal evidence and the personalities who occupied the building at various times since construction. More tangible considerations – those that impact the Marina Peninsula built fabric, its historical significance and the need for the preservation of historical traces that define the neighborhood and respect the already long history – over 100 years--of the building are overlooked as is the community-wide affection for these characterful, historic structures.
- A five-story wall of building directly fronting the walk street, with no step back, very limited setbacks and a full roof deck, would dramatically dominate and visually overwhelm this historic environment.
- The building's height, mass, and consolidation of 3 (4?) lots into one large project site create a canyon effect that is fundamentally at odds with the existing pattern of smaller structures, open front yards, and human-scale architecture along the walk streets.

Conclusion – Scenic, Visual, and Special Community Character:

The project's height, bulk, and massing do not comply with the 28-foot walk street height limit or with the LUP's requirement that development respect height limits, setbacks, and massing standards in this highly scenic coastal area. The proposed 5-story, 59-foot building plus roof deck is not visually compatible with existing walk street character and **would significantly degrade scenic and visual qualities and the Special Coastal Community status of the Venice walk streets**, in violation of Coastal Act sections 30251 and 30253(e) as well as LUP Policies I.D.3 and I.E.1.

3. Harmonizing Density Bonus Law and Coastal Act – Government Code §65915(m)

Government Code §65915(m) explicitly states that all density bonus incentives, waivers, and reductions must be granted in a manner that is consistent with both the Density Bonus Law and the Coastal Act. The Legislature's direction is that these statutes be "harmonized" so that affordable housing is increased in the Coastal Zone *while also protecting coastal resources and coastal access*.

In the 657 Sunset Ave case, the LUPC concluded that, on balance, the requested incentives and waivers were modest compared to typical density bonus projects in non-Coastal Zone areas of Los Angeles, that that project omitted a roof deck, kept the fourth floor stepped back, and provided 24% VLI units *where none previously existed*, such that the density bonus benefits could be harmonized with Coastal Act resource protection on that site.

At 17-21 Jib:

- The applicant is requesting maximum or near-maximum relief from several of the most sensitive standards in the Venice Coastal Zone:
 - Massive height increase on a walk street from 28' to 59';

- Major yard reductions on all sides;
- 84% reduction in on-site parking relative to VCZSP/LUP requirements in an area that is extremely close to the beach and Venice Canal/Ballona Lagoon recreation areas;
- Consolidation of 3 (4?) lots (beyond the 2-lot maximum in VCZSP/LUP).
- The project's design does not attempt to "do more with less" (for example, by maintaining 28' height and greater setbacks while still providing affordable units). Instead, it seeks to maximize buildout in every dimension – height, FAR, step backs and setbacks/building footprint, and unit count.
- The applicant has not demonstrated that all of these requested incentives and waivers are the minimum physically necessary to accommodate the 6 affordable units. Also, there are currently 5 existing affordable units, so only 1 affordable unit is being added by providing the proposed extremely significant incentives. Given the size and intensity of the proposed structure, it appears highly likely that a shorter, less massive building with more parking and fewer waivers could still provide a meaningful number of affordable units while better protecting coastal resources.

Under §65915(m), the City cannot treat the Density Bonus Law as overriding the Coastal Act or the LUP. Instead, the City must limit or deny incentives and waivers that would otherwise cause the project to conflict with Coastal Act resource protection policies. Where the requested waivers would result in:

- **Significant adverse impacts on coastal access and parking;**
- **Degradation of scenic and visual resources in a highly scenic and sensitive walk street environment; and**
- **Harm to a recognized Special Coastal Community;**

the City is obligated to withhold those specific waivers and require redesign so that affordable housing goals and coastal protection goals are both honored.

Conclusion – Harmonization

The project, as proposed, does not harmonize the Density Bonus Law with the Coastal Act. Instead, *it uses density bonus tools to override key coastal protections (walk street height, parking, massing, lot consolidation) in a manner that is directly contrary to §65915(m)'s command that density bonus entitlements be granted only in a Coastal-Act-consistent manner.*

4. Cumulative Effect and Precedent

Coastal Act §30250(a) requires that new development not result in significant adverse cumulative impacts on coastal resources.

Allowing a 5-story, 59-foot-tall structure (over 70 feet to guardrail/parapet) with 9 parking spaces for 25 units and 3 (4?)-lot consolidation on a historic walk street would establish a powerful template for similar proposals throughout the Venice walk- system. Once such a precedent is set, it will be very difficult for the City or the Coastal Commission to deny similar height, massing, parking, and lot consolidation requests, for any project for a similarly scaled composite lot or simply a normal size, single lot project, along other walk streets, without appearing arbitrary.

This would, over time:

- Incrementally erase the walk street character that underlies Venice's Special Coastal Community designation;
- Significantly burden coastal visitor parking and circulation; and
- Convert cherished, pedestrian-oriented coastal neighborhoods into corridors of tall, continuous, bulkier structures serving primarily new, higher-income residents, even if a small fraction of units remain income restricted.

Given the small size and extreme sensitivity of the walk street system, even a small number of such projects could have a disproportionately large cumulative impact on coastal access and scenic resources. That cumulative impact is precisely what the Coastal Act is designed to avoid.

5. Mello Act & Housing Crisis Act (HCA)

According to the November 13, 2025 Mello Act determination of affordable units from the L.A. Housing Department, two affordable units exist at 21 Jib St.

According to the August 30, 2021 Mello Act determination of affordable units from the L.A. Housing department, **1 presumed affordable unit exists at 17 Jib St.**

According to the July 11, 2004 Housing Crisis Act/Replacement Unit determination letter from the L.A. Housing Department, all the 6 existing dwelling units at the property (1 unit at 17 Jib and 5 units at 21 Jib) all "protected," as follows:

1 presumed affordable protected unit (non-RSO)
 1 RSO presumed affordable protected unit
 3 RSO affordable protected unit
1 RSO unit
 6 Total protected units

5 of the 6 units were occupied at the time of application, which means the residents will be displaced, with one unit, Jib 17, having been demolished (without a CDP) in 2020.

The net increase in affordable housing is one unit, only. An increase of 1 affordable unit does not justify the significant Density Bonus requests.

6. Environmental Justice & Housing Considerations

The Coastal Commission's Environmental Justice Policy and Coastal Act §30604(f) & (g) place strong emphasis on protecting and providing affordable housing in the Coastal Zone.

The proposed project does include 5 VLI and 1 Low Income unit out of 25 total units (~24% affordable), comparable in proportion to the 657 Sunset Ave project. This is a significant benefit and should be acknowledged. However, there is only a 1-unit net increase in affordable housing for the Jib project, compared with a net increase of 6 affordable units for the Sunset project.

However:

- Environmental Justice does not eliminate the Coastal Act's requirement to protect coastal resources and coastal access, especially in highly scenic, historic, and visitor-serving walk street districts.

- There is no evidence that these specific 25 units, on this specific walk street site, at this intensity (5 stories, 59 feet, 3.73:1 FAR, very little parking) are the only way – or the least harmful way – to produce affordable housing on this property.
- A smaller-scale project that complied with the 28-foot height limit, provided more on-site parking, and respected setbacks and massing standards could still provide meaningful affordable housing while significantly reducing harm to walk street character and coastal access.

In other words, supporting affordable housing in the Coastal Zone does not require accepting any and all project designs that happen to include affordable units, especially when they conflict with core Coastal Act protections in a Special Coastal Community.

Overall Conclusion

On balance, the proposed project at 17–21 Jib Street:

- Conflicts with Coastal Act coastal access and parking policies by slashing required on-site parking from 57 to 9 spaces in a highly parking-starved, visitor-serving area just steps from the beach;
- Violates the LUP and VCZSP height and massing framework for the walk streets by proposing a 5-story, 59-foot building plus roof deck in an area with a 28-foot height limit and an explicit directive to respect walk street scale;
- Harms scenic and visual resources and undermines the Special Coastal Community character of the Venice walk streets;
- Overuses Density Bonus incentives and waivers in a way that does not appear to be the minimum necessary to provide affordable housing and is not harmonized with the Coastal Act as required by Government Code §65915(m); and
- Creates serious cumulative impact and precedent concerns for the Venice walk street system and coastal access.

For these reasons, LUPC staff recommends that the VNC support denial of the current proposal and urge the City and the applicant to pursue a substantially redesigned project that:

- Complies with the 28-foot walk street height limit;
- Provides significantly more on-site parking in line with coastal access policies;
- Respects walk street setbacks, open space, and massing standards; and
- Still maximizes feasible affordable housing in a manner that truly harmonizes the Density Bonus Law with the Coastal Act, rather than sacrificing coastal resources to achieve density.

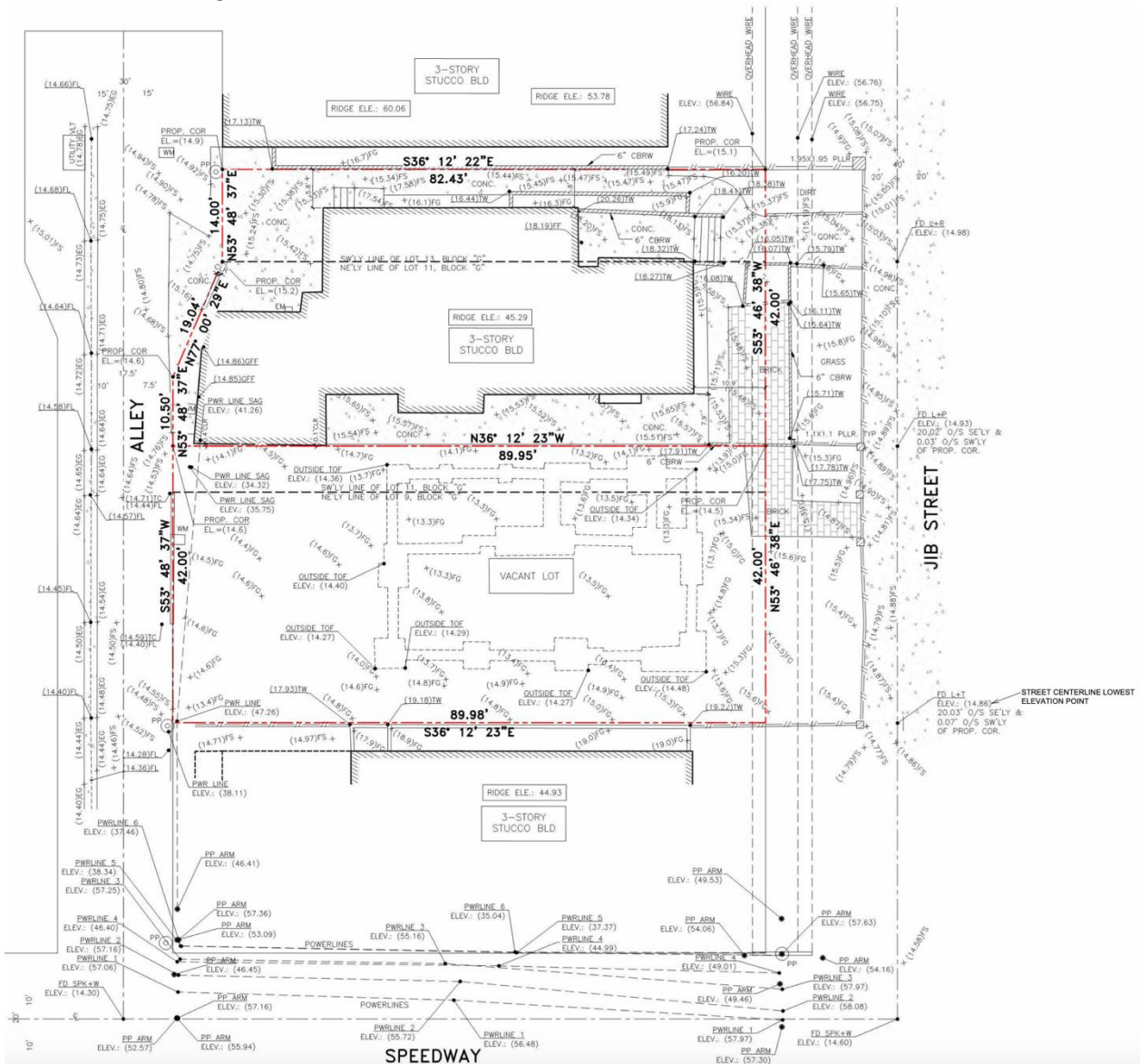
I. Existing:



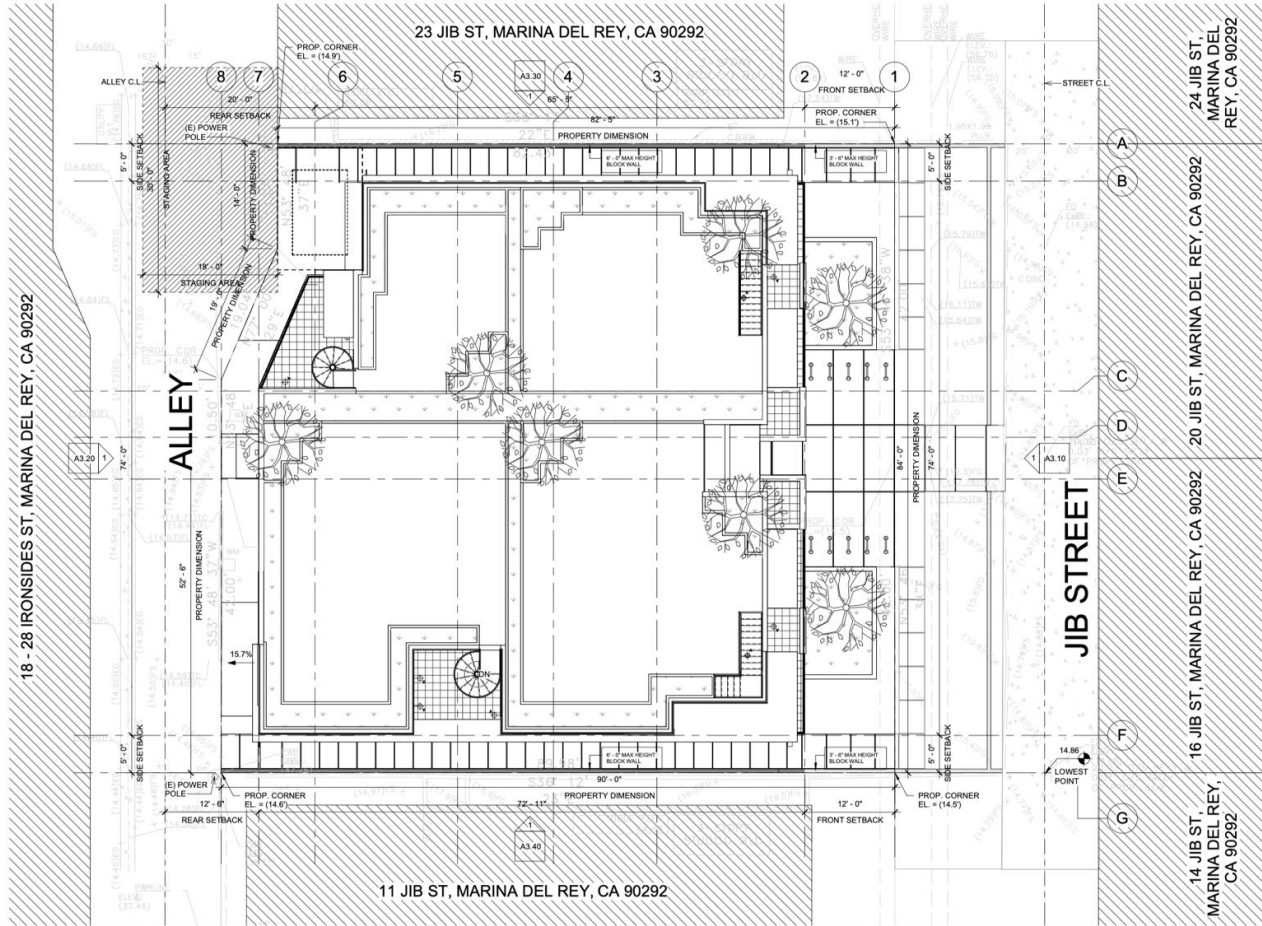
II. Rendering of Project



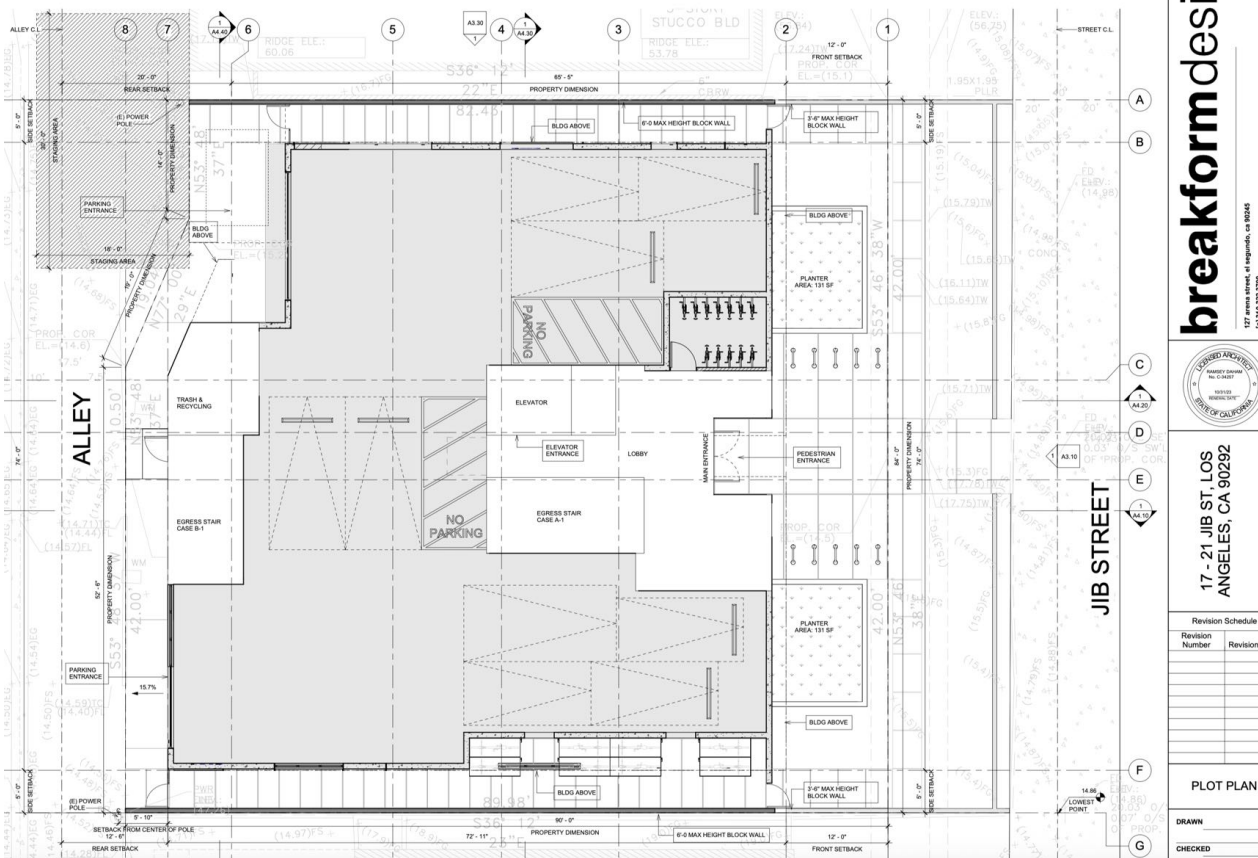
III. Existing Site Plan:



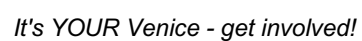
IV. Proposed Site Plan:



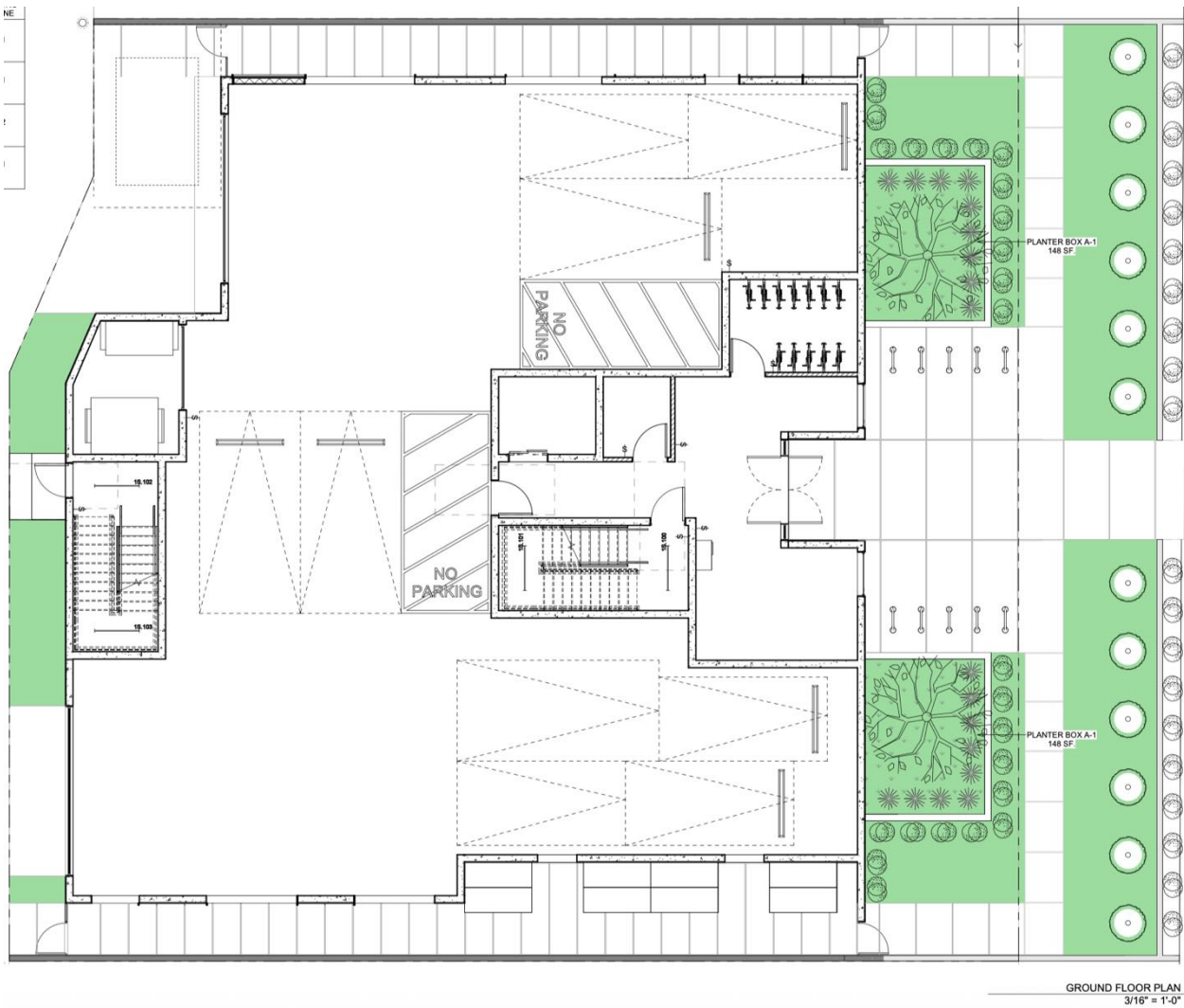
V. Plot Plan:



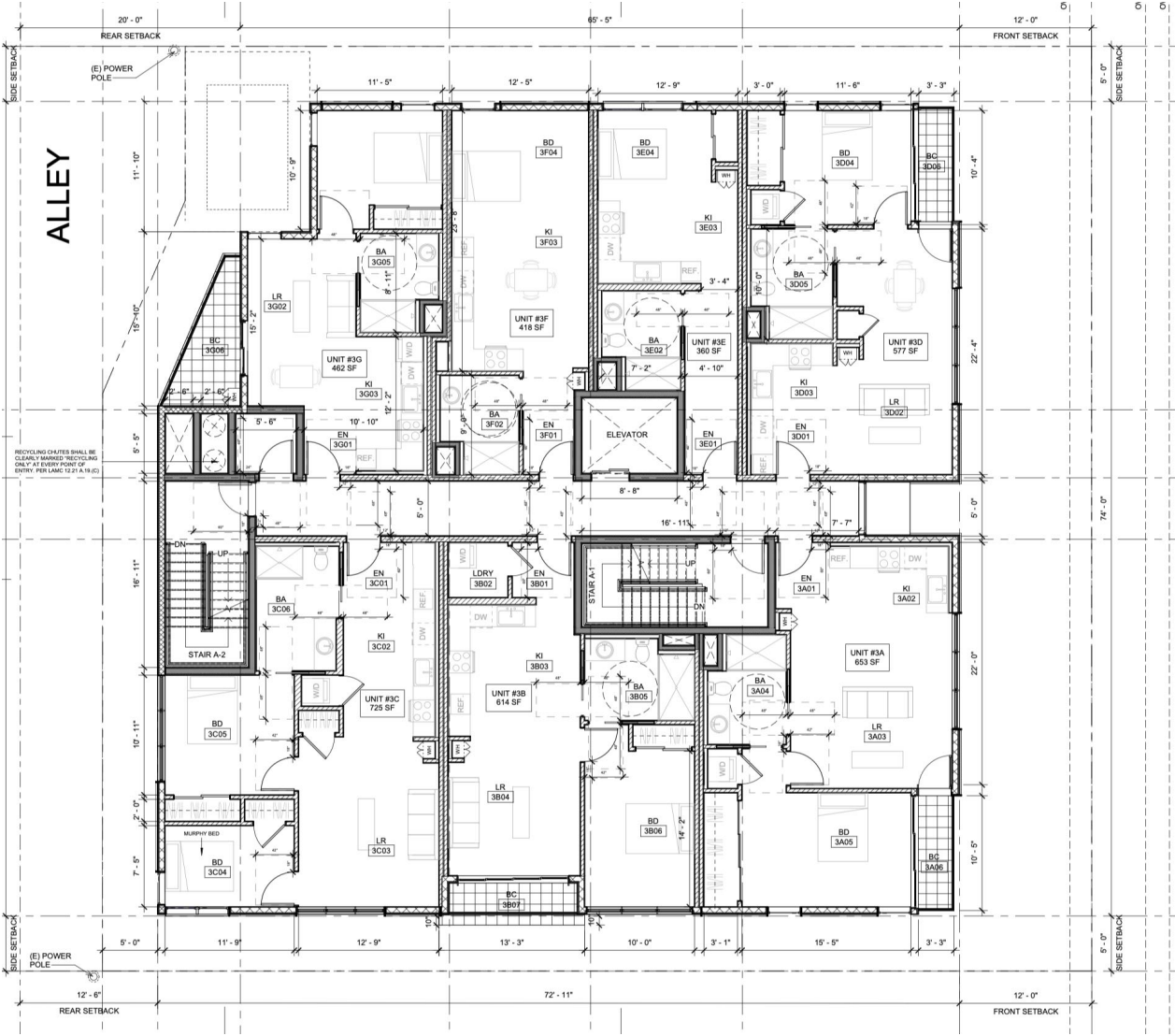
First Floor:



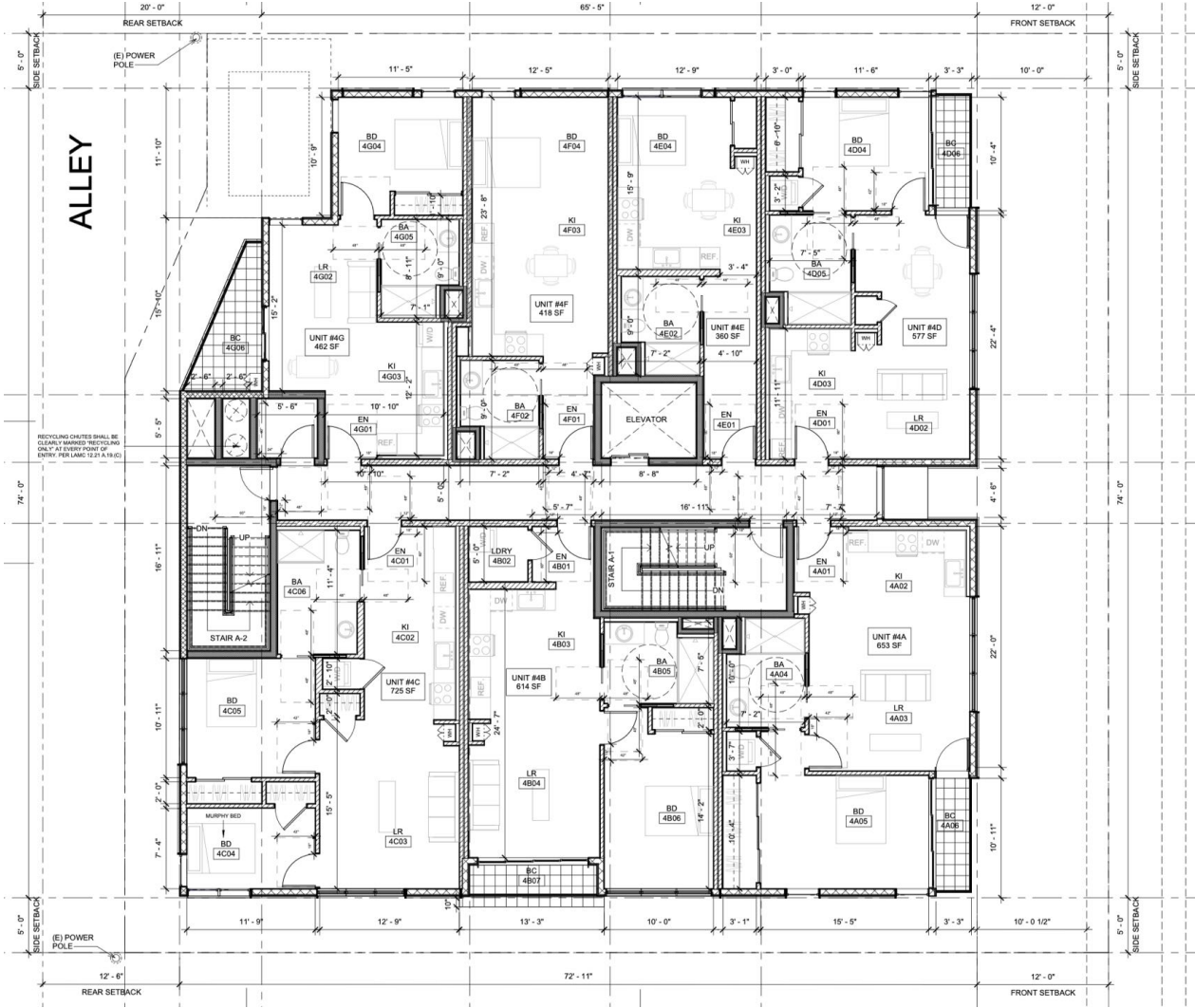
Ground Floor Plan with Landscape:



Third Floor:

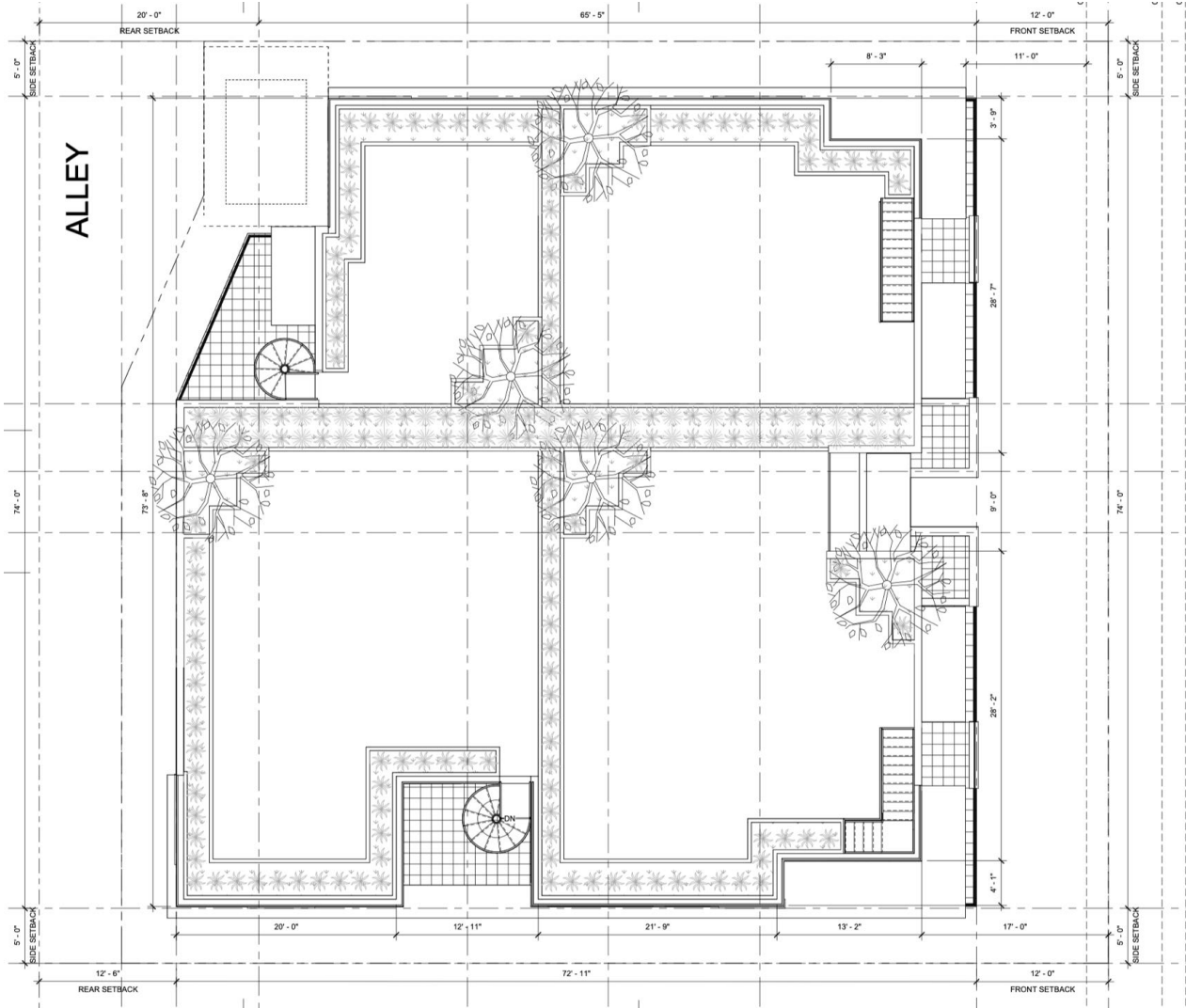


Fourth Floor:

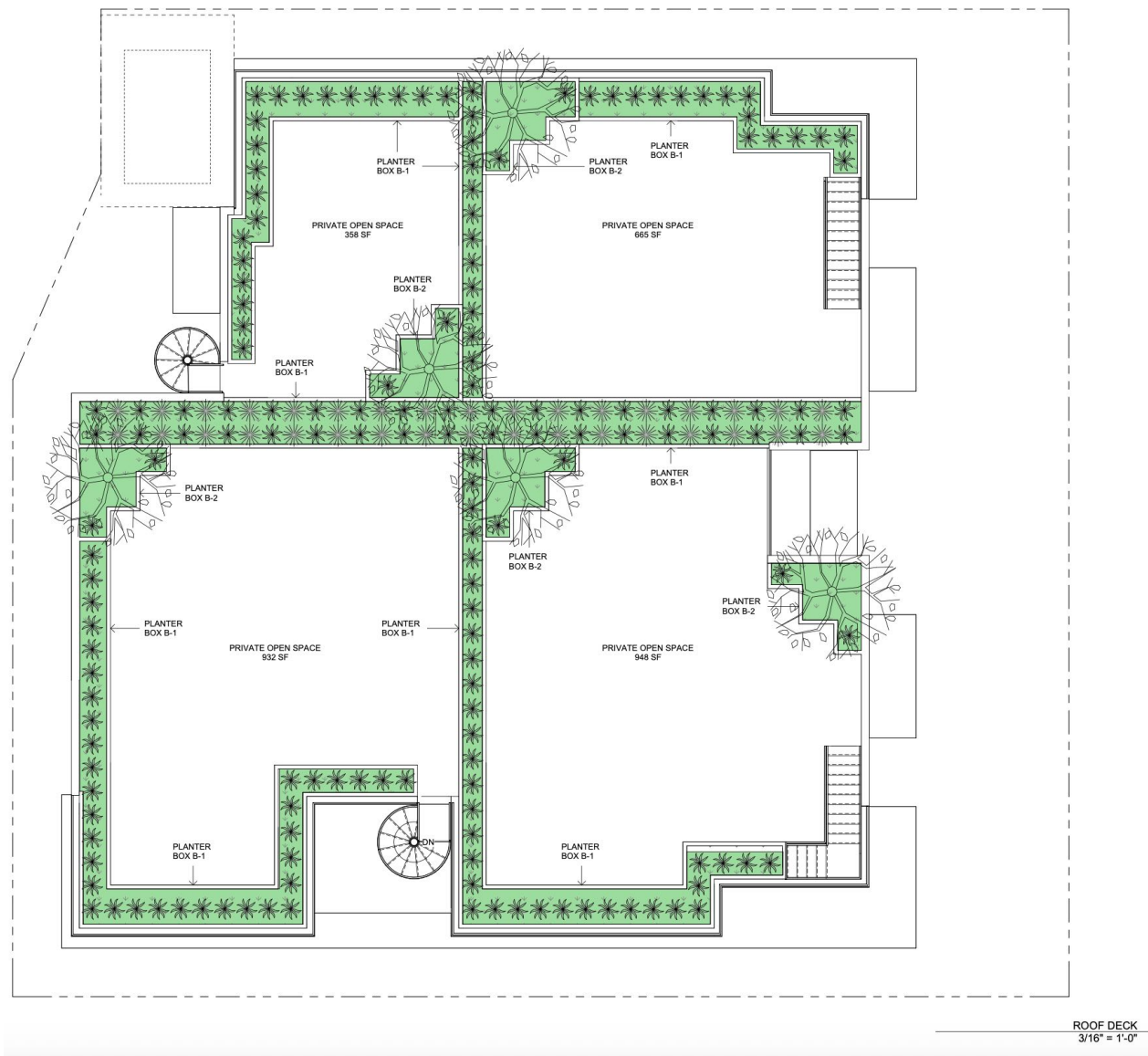


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Roof Deck:



Roof Deck with Landscape:



East elevation:



West elevation:



[illegible]

ADDENDUM

LUP Walk Street Policies With Which the Project Must Comply

The 17-21 Jib St project prejudices the ability of the City of Los Angeles to prepare a Local Coastal Program (LCP) that is in conformity with Chapter 3 of the California Coastal Act of 1976 as it violates the following LUP policies:

- LUP Policy I.A.7. Multi-family Residential - Low Medium II Density
- LUP Policy I.D.3. Views of Natural and Coastal Recreation Resources
- LUP Policy I.E.1. General Preservation of Venice as a Special Coastal Community
- LUP Policy I.E.2. Preservation of Venice as a Special Coastal Community Scale
- LUP Policy I.E.3. Preservation of Venice as a Special Coastal Community Architecture
- LUP Policy I.F.1. Historic and Cultural Resources
- LUP Policy II. A. 3. Parking Requirements
- LUP Policy II.C.1. General Non-Vehicular Coastal Access Policy Private Developments
- LUP Policy II.C.7. Walk Streets
- LUP Policy II.C.10 Walk Streets
- LUP Policy II.C.11. Encroachments into Walk Street Right-of-Way
- LUP Policy Group III Shoreline Access

LUP Policy I. D. 3. Views of Natural and Coastal Recreation Resources states:

*"The scale of development shall comply with height limits, setbacks and standards for building massing specified in Policy Groups I.A and I.B, Residential and Commercial Land Use and Development Standards of this LUP, in order to protect public views of **highly scenic coastal areas and vista points**, including, but not limited to, the canals, lagoon, jetty, pier, Ocean Front Walk, Walk Streets and pedestrian oriented special communities." (Emphasis added)*

LUP Policy I. A. 7. c. Marina Peninsula Multi-family Residential - Low Medium II Density states:

"Accommodate the development of multi-family dwelling units in the areas designated as "Multiple Family Residential" and "Low Medium II Density" on the Venice Coastal Land Use Plan (Exhibits 9 through 12). Such development shall comply with the density and development standards set forth in this LUP. Use: Two units per lot, duplexes and multi-family structures. Density: One unit per 1,200 square feet of lot area. Lots smaller than 4,000 square feet are limited to a maximum density of two units per lot. Yards: Yards shall be required in order to accommodate the need for fire safety, open space, permeable land area for on-site percolation of stormwater, and on-site recreation consistent with the existing scale and character of the neighborhood. Height: Not to exceed 35 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)." (Emphasis added)

The LUP echoes the priority expressed in Coastal Act for preservation of the nature and character of unique residential communities and neighborhoods. When the Commission certified the LUP in 2001, it considered the potential impacts that development could have on public views to the coast and community character. In doing so, the Commission adopted policies and specific residential building standards to ensure development was designed with

Walk Streets are a highly scenic area as per LUP Policy I.D.3., which indicates that, as per Coastal Act Section 30251, the project shall be subordinate to the character of its setting, which herein we have shown it is not.

Walk Street is defined in the LUP as:

LUP Policy Group III. Shoreline Access states:

LUP Policy II.C.1. General Non-Vehicular Coastal Access Policy Private Developments states:

LUP Policy II.C.7. Walk Streets states:

The full length of the Jib Walk Street, east of Speedway to Pacific Ave, is listed as a Walk Street in LUP Policy II.C.7. Walk Streets.

The map shows the Ballona Marsh area with various streets and the proposed Ballona Wetlands Bank. The streets shown are Fleet St, Gallion St, Hurricane St, Ironsides St, Jlo St, Kerch St, Lighthouse St, Mast St, and Northstar St. The Ballona Canal and Ballona Bay are also labeled. The proposed Ballona Wetlands Bank is shown as a green area along the Ballona Bay and Ballona Canal. The map also shows the Ballona Marsh area and the proposed Ballona Wetlands Bank area.

- It's YOUR Venice - get involved!*

LUP Policy II.C.10 Walk Streets – Residential Development Standards, states:

“New residential development along walk streets shall enhance both public access and neighborhood character. Building materials, colors, massing, and scale of new structures shall complement those of existing structures in the neighborhood. Building facades shall be varied and articulated to provide visual interest to pedestrians. Primary ground floor residential entrances and frequent windows shall face the walk streets. Front porches, bays, and balconies shall be encouraged. In cases of duplexes and low density multiple-family buildings, entries shall be located in the exterior building façade for each residential unit, shall face walk street, and be well-defined and separate.” (Emphasis added)

LUP Policy II.C.11. Encroachments into Walk Street Right-of-Way states:

“Encroachments into City right-of-way shall be limited to grade level uses including gardens, patios, landscaping, ground level decks and fences. The gardens/patios in the right-of-way, between the fences and the buildings, shall be permitted to provide a transitional zone between the public pathways and private dwellings. To create a defensible space, the planting along the walk streets shall not impede the view of walkways by the residents and the view of the gardens by the pedestrian. Creative use and arrangement of permeable paving materials shall be encouraged. Any fence, wall or hedge erected in the public right-of-way shall not exceed 42 inches in height as measured from the existing grade of the public right-of-way. The use of decorative fence patterns such as split rail, picket and rustic is encouraged. New fences shall be located in line with existing fences on the same side of the street.” (Emphasis added)

In addition, the Walk Streets are protected as historic resources.

LUP Policy I.F.1. Historic and Cultural Resources states:

“The historical, architectural and cultural character of structures and landmarks in Venice should be identified, protected and restored where appropriate, in accordance with historical preservation guidelines. The following buildings, streets, and trees have been identified through the coordinated efforts of surveys performed by the Venice Historical Society, Venice Community, State Coastal Conservancy and City of Los Angeles as significant architectural, historical and cultural landmarks in the Venice Coastal Zone. ...Walk Streets (as shown in the LUP on Exhibit 19, Pedestrian Access and Bicycle Trails).” (Emphasis added)

The project does not preserve views along and from the public right-of-way (Jib Walk Street) as required by LUP Policy II.C.7. Also, the mass and scale of the proposed development is not consistent with the development policies for Walk Streets in the LUP.

With regards to community character, the LUP requires that projects on Walk Streets provide facades that “shall be varied and articulated to provide visual interest to pedestrians.” The building façade provides minimal articulation and does not include a stepped back design on the upper floors.

Additionally, Policy II.C.10 of the LUP requires residences on Walk Streets to enhance public access, including public views, and to have varied and articulated façades. The proposed project will occupy existing open space and eliminate the potential for enhanced public views along the Walk Street. The proposed project is not consistent with the Walk Street policies in the LUP, which requires definitive accentuation or, at best, varied planes of the Walk Street facing façade.

Furthermore, Section 30251 of Chapter 3 of the Coastal Act requires new development to protect and enhance views to and along the coast. The project site is located on a Walk Street that provides views to the beach, coast, and ocean beyond. The proposed project is not designed to protect or enhance existing views to the ocean. In addition, the project does not restore and enhance visual quality in visually degraded areas, as required by Section 30251. The project does not conform with Coastal Act Section 30251 with respect to protection of visual resources and would cause an adverse cumulative impact to the surrounding neighborhood.

Policies I.A.2 and I.E.2 of the LUP require new development to be consistent with the mass and scale of residential neighborhoods with regard to height, bulk, buffers, and setbacks. The yards are not consistent with the neighborhood or the minimum required setbacks of current development standards.