



Venice Neighborhood Council

LAND USE AND PLANNING COMMITTEE
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Land Use & Planning Committee (LUPC) STAFF REPORT-- DRAFT Oct 1, 2026

City Case No: DIR-2026-3122-SPPC

CEQA Case No: ENV-2026-3123-CE

Related City Case No(s): ADM-2026-1810-CEX

Address of Project: 924, 926, and 928 West Marco Place

Applicant/Property Owner: Jeffrey L. Donovan

Applicant's Representative: David Crimmins, Crimmins Architecture

Standard of Review: Venice Coastal Zone Specific Plan and LAMC §13B.4.2 for Specific Plan Project Compliance; California Coastal Act PRC §30610 for the Coastal Exemption; CEQA Guidelines §§15301 and 15331

Coastal Zone: Single x permit jurisdiction

City Action: Director's Determination issued August 12, 2026; SPPC appeal deadline August 27, 2026

Email for City Planner: luis.c.lopez@lacity.org

LUPC Staff assigned: Nicole Meyer

I. Detailed Project Description:

The project consists of the repair and rehabilitation of a bungalow court consisting of three existing duplex structures containing a total of six dwelling units at 924, 926 and 928 Marco Place. The three buildings were constructed in 1925 and are identified as contributors to the SurveyLA-identified Milwood Venice Walk Streets Historic District, an eligible historic district.

The scope described in the Coastal Exemption includes rehabilitation and remodeling of the one-story duplexes at 924 and 928 Marco and the two apartments over the garage at 926 Marco.

Work includes replacement of portions of exterior wall framing due to rot, rebuilding existing windows and exterior doors, replacement of stucco, roofing and interior finishes, replacement of the existing balcony and stairs at 926, conversion of the private garage area

to an open carport, and replacement of the garage floor slab. No additional floor area is proposed.

The SPPC determination describes the project as repair and rehabilitation of the three existing duplex structures, maintaining all six dwelling units, six parking spaces, and the existing building heights and massing.

Tenant History:

The property contains six units subject to the Los Angeles Rent Stabilization Ordinance (RSO). LUPC staff initially reviewed the circumstances under which the occupied units became vacant. Public records obtained from LAHD document an **Ellis Act withdrawal** initiated by the owner in May 2025 (Ellis Case #LD060733) and payment of required relocation compensation to the former tenants.

Correspondence included in the public-records production for this case also indicates that the owner told a former tenant that he intended for the units to be occupied by family rather than returned to the rental market during the five-year period following the withdrawal. This correspondence is noted as evidence of the owner's stated intention at the time and should not be construed as a legal determination regarding future rental restrictions.

The Ellis withdrawal does not itself remove the underlying RSO status of the existing units. Applicable Ellis Act and RSO requirements will govern any future return of the units to the rental market.

As part of the Ellis Act withdrawal, a **Notice of Constraints to Landlords and Successors in Interest** has been recorded against the property. Importantly, these restrictions apply not only to the current owner but also to **any successor in interest**, including a subsequent purchaser; sale of the property therefore does not extinguish the recorded Ellis restrictions.

- **Notice before re-rental.** Before offering a withdrawn unit for rent again, the owner must file a Notice of Intention to Re-Rent Withdrawn Accommodations with LAHD.
- **Re-rental within two years.** Offering a withdrawn unit for rent within two years can expose the landlord to actual and exemplary damages to displaced tenants and potential civil action by the City.
- **Five-year rent restriction.** If a withdrawn unit is returned to rental use during the applicable five-year period, its initial rent is generally limited to the lawful rent in effect at the time of withdrawal plus permitted annual adjustments. After the applicable five-year restriction expires, that Ellis-specific rent limitation no longer applies and the owner may generally establish a new initial rent, subject to other applicable law. **The units nevertheless remain subject to the RSO thereafter; an Ellis Act withdrawal does not remove RSO status.**

- **Displaced-tenant rights.** Former tenants may have rights to be offered their former accommodations if the property is returned to rental use, with applicable rights extending for as long as ten years after withdrawal.
- **Replacement rental units.** If the existing units are demolished and replacement rental units are constructed and offered for rent within five years, the initial rent may be established by the owner, but the newly constructed rental units become subject to the RSO.
- **Annual reporting.** The owner is required to submit annual property status reports to LAHD for at least seven years, reporting the status of demolition or development and any newly constructed rental units.

Historic-Cultural Monument Nomination: In January 2025, Friends of Marco Court nominated the property for designation as a Los Angeles Historic-Cultural Monument (CHC-2025-1139-HCM), arguing that it qualified under Criterion 3 as an intact example of a 1925 Spanish Colonial Revival bungalow court. The nomination noted that SurveyLA had previously identified Marco Place Court as a contributing property within the Milwood Venice Walk Streets Historic District and also documented the removal of substantial mature landscaping in December 2024, including several mature trees and courtyard planting. At its May 15, 2025 meeting, however, the Cultural Heritage Commission voted 4–0 that the property did not meet the definition of an individual Historic-Cultural Monument under Los Angeles Administrative Code §22.171.7, and the nomination was declined. **The denial of individual HCM designation does not alter the property's separate identification as a contributor to the SurveyLA-identified Milwood Venice Walk Streets Historic District.**

II. Motion:

Motion: Motion: To be determined following LUPC consideration of the additional Coastal Exemption information described below.

Moved:

Seconded:

Vote: X-X-X (X absent, X recused).

III. Pros & Cons of Project:

Positive aspects of project:

- **Historic rehabilitation.** The approved project is designed as rehabilitation of the three existing 1925 duplex structures and retains the bungalow-court configuration, building footprints, height and massing. The buildings are identified as contributors to the SurveyLA-identified Milwood Venice Walk Streets Historic District.
- Retention of all six dwelling units. No units are demolished or added, and the existing residential use and legally nonconforming six-unit density are maintained.

- No increase in development intensity. The project adds no floor area and does not increase the existing height or massing of the buildings.
- Historic rehabilitation review. The Office of Historic Resources reviewed the rehabilitation and determined that it is consistent with the Secretary of the Interior's Standards and maintains the buildings' contribution to the historic district.
- Retention of the bungalow-court configuration. The existing U-shaped arrangement, central courtyard relationship, low-scale massing, and orientation toward the Marco Place Walk Street are maintained. The HCM nomination identified these as important characteristics of the property.

Negative aspects / concerns regarding project:

- Loss of six RSO units from the active rental market. Although the Ellis Act withdrawal and required tenant compensation appear to have been properly completed, the withdrawal resulted in six existing RSO units being removed from rental use. The owner has stated an intention to use the units for family occupancy during the initial post-withdrawal period.
- Removal of substantial mature landscaping. The Historic-Cultural Monument nomination documents removal in December 2024 of mature landscaping throughout the courtyard and front yard, including mature ash and crepe myrtle trees and other established planting.
- Vegetation removal is not clearly reflected in the entitlement record reviewed by LUPC. Neither the written CEX project description nor the subsequent SPPC application clearly identifies this vegetation removal as part of the development. Because the CEX was issued after some work had already occurred, it remains unclear whether the previously completed removal was evaluated as part of the Coastal Exemption.
- Extensive rehabilitation of historic structures. The rehabilitation is substantial, including exterior-wall framing replacement, roof and stucco replacement, window and door reconstruction, interior gut rehabilitation, and structural repair. As discussed below, additional clarification is needed regarding the calculation of retained exterior walls and the extent of alteration of other major structural components for purposes of the Coastal Exemption. Continued construction should therefore remain in substantial conformance with the approved plans and historic-resource conditions.
- Reduced historic landscape character. The HCM nomination specifically described the mature trees, landscaping, courtyard and open skyline as contributing to the property's setting and relationship to the Walk Street. Although the property was not designated as an individual HCM, removal of much of that landscaping alters an aspect of the site's historic setting.
- No landscape plan was included in the application

4. Findings re. Entitlements

A. Specific Plan Project Compliance – DIR-2026-3122-SPPC

The project is subject to **Specific Plan Project Compliance pursuant to LAMC §13B.4.2 and the Venice Coastal Zone Specific Plan**. The SPPC review applies to the Specific Plan provisions concerning density, height, access, parking, and Walk Street standards. Where

the Specific Plan is silent, all other applicable provisions of the LAMC and requirements of other agencies remain applicable.

City Planning issued its Director's Determination approving the SPPC on August 12, 2026 (Appendix A). The SPPC approval is expressly conditioned on the scope approved under the Coastal Exemption ADM-2026-1810-CEX.

1. Compatibility with Neighborhood Scale and Character: The Venice Coastal Zone Specific Plan requires a finding that the project is compatible in scale and character with the existing neighborhood and will not be materially detrimental to adjoining lots or the immediate neighborhood.

Planning found that the rehabilitation maintains the existing one- and two-story buildings, with **no** change to existing height or massing, and therefore remains compatible with the predominantly one- and two-story residential development surrounding Marco Place.[2]

LUPC Staff Assessment: The project retains the existing bungalow-court configuration, building footprints, height, and general massing. Staff has not identified evidence contradicting this finding.

2. Consistency with the Certified Venice Land Use Plan: The determination evaluates the project for consistency with applicable policies of the certified Venice Land Use Plan, including Low Medium I residential density, parking, and Walk Street development standards. The existing six-unit density is legally nonconforming. No dwelling units are proposed to be added or physically demolished, and the existing yards and building heights are maintained. Planning therefore found the project consistent with LUP Policy I.A.6.

LUPC Staff Assessment: Staff has not identified a conflict with the density, yard, or height provisions relied upon in this finding.

3. Density: The property consists of two lots containing three existing duplex structures and six dwelling units. Although the six-unit density is legally nonconforming under current Milwood Subarea standards, the project neither increases nor decreases the existing density. Planning determined that the existing legally nonconforming density may therefore be maintained.

4. Height: The Specific Plan permits a maximum height of 28 feet for development fronting Walk Streets. Existing building heights are approximately:

- **924 Marco:** 12 feet, 1 inch
- **926 Marco:** 19 feet, 5 inches
- **928 Marco:** 12 feet, 2 inches

No increase in height is proposed. Planning therefore found the project compliant with the applicable height standard.

5. Access: The Specific Plan requires vehicular access for projects adjacent to Walk Streets to be provided from a street or alley other than the Walk Street. Existing vehicular access is retained from Marco Court at the rear of the property, and Planning found the project compliant with this requirement

6. Walk Street Standards: The project retains the existing Walk Street-facing building configuration and proposes rehabilitation of the facades, including windows, stucco, entrances, roof treatment, stairs, and balcony. Planning found the project consistent with the Walk Street residential development standards.

The project also proposes replacement of the existing 42-inch fence along Marco Place. The determination requires any work within the public right-of-way to receive separate review and approval from the Department of Recreation and Parks.

LUPC Staff Assessment: Staff has reviewed the submitted plans and elevations and finds that the rehabilitation maintains the existing low-scale Walk Street-facing configuration, including entrances and windows oriented toward Marco Place, while retaining the existing building massing and scale. The proposed façade rehabilitation, including replacement of the existing stucco finish, is consistent with the historic character and materials of the bungalow court as shown in the approved plans.

7. Parking/ Assembly Bill 2097: The Venice LUP would ordinarily require 14 parking spaces for six multifamily units; the property currently contains six spaces and is legally nonconforming as to parking. Planning further determined that the site is within one-half mile of a Major Transit Stop and is therefore subject to **AB 2097**, which prohibits imposition of a minimum automobile parking requirement. The project nevertheless retains six parking spaces.

The Specific Plan also provides an exception from current parking standards for additions and alterations to existing residential buildings unless more than 50 percent of the existing exterior walls are removed or replaced. Planning found that the approved project retains more than 50 percent of the exterior walls and therefore qualifies as an alteration rather than demolition/new construction for purposes of this provision.

LUPC Staff Assessment: Staff has not identified conflict with the parking determination. Planning's parking determination relies in part on its finding that more than 50 percent of the existing exterior walls are retained. As discussed in the Coastal Exemption analysis below, additional clarification is needed regarding how retained exterior walls were calculated. Staff therefore does not make an independent determination regarding the exterior-wall retention calculation.

B. Coastal Exemption – ADM-2026-1810-CEX

The property is within the **Single Permit Jurisdiction Coastal Zone**. City Planning issued Coastal Exemption ADM-2026-1810-CEX on April 10, 2026, determining that the rehabilitation qualified for exemption from Coastal Development Permit requirements pursuant to Coastal Act PRC §30610.

The City's CEX form states that a CEX may not be issued for, among other things:

- alteration of 50 percent or more of any major structural component of each structure, including exterior walls, roof structure, floor structure, or foundation;
- addition, demolition, removal, or conversion of an entire primary residence or other whole structure;
- specified significant grading or boring; or
- a change to a more or less intensive use.

The CEX application describes rehabilitation of the existing duplexes with no additional floor area, less than 50 percent exterior-wall replacement, rebuilding of existing windows and doors, replacement of stucco, roofing and interior finishes, replacement of the balcony and stairs at 926, conversion of garage areas to open carports, and replacement of the garage slab.

Approved plans identify exterior-wall alteration of approximately **48 percent at 924 Marco, 42 percent at 926 Marco, and 48 percent at 928 Marco.**

he drawings calculate the 50% exterior-wall threshold based on exterior-wall framing and separately provide calculations for stucco retention and replacement/infill. The stucco calculations indicate that more than 50% of the existing stucco is retained at each structure. Coastal Commission staff has stated in a prior Venice appeal involving a duplex that, where a "remaining wall" is used to determine whether development constitutes a remodel or new structure, the wall should remain intact as part of the structure and retain its siding, drywall/plaster, windows, and doorways.¹ The plans also call for rebuilding of existing windows and new interior drywall and do not clearly identify whether the wall segments counted as remaining in the framing calculation retain all of these components. Additional clarification is therefore needed regarding which wall segments counted as remaining satisfy this standard.

The plans reviewed by LUPC provide percentage calculations for exterior-wall framing but do not appear to provide sufficient information to evaluate the extent of alteration or replacement of the structures as a whole. Coastal Commission staff has stated in the same Venice appeal that, in determining whether 50 percent or more of an existing structure is being replaced, it considers measurable components including the foundation, plumbing, electrical, walls, floor, and roof, and evaluates the amount of each component being

¹ California Coastal Commission, *Staff Report: Appeal – Substantial Issue and De Novo*, Appeal No. A-5-VEN-16-0021 (Jerome Hunter), April 1, 2016, p. 14. The report discusses the 50-percent replacement analysis for a duplex, including foundation, plumbing, electrical, walls, floor, and roof, and states that walls counted as "remaining" should retain siding, drywall/plaster, windows, and doorways.

replaced.[1] Additional information is therefore needed to determine the extent of replacement of these components for each existing structure.

Tree and Vegetation Removal: Coastal Act §30106 defines “development” to include the removal or harvesting of “major vegetation.” The HCM nomination documents removal of substantial mature landscaping from the property in December 2024; however, that work is not identified in the written scope of ADM-2026-1810-CEX.

Because the property contains multifamily structures, 14 CCR §13253 is also relevant.² Section 13253(a)(2) provides that “landscaping on the lot” is considered part of an existing structure for purposes of the improvement exemption under PRC §30610(b). Section 13253(b)(1) provides that an improvement to a structure requires a Coastal Development Permit where the structure or improvement is located “in an area designated as highly scenic in a certified land use plan.” Section 13253(b)(2) also identifies significant alteration of landforms, including removal or placement of vegetation, in a highly scenic area as requiring a Coastal Development Permit. th17c-4-2016

The Venice Land Use Plan identifies walk streets among the highly scenic coastal areas and vista points protected under Policy I.D.3. Prior City Planning findings concerning Marco Place have also identified the Milwood Walk Streets as a highly scenic coastal area under the Venice LUP. The subject property fronts the Marco Place Walk Street within this area.

The CEX expressly provides that if the project description does not conform to the actual project constructed or to PRC §30610, the exemption is null and void.

LUPC Staff Assessment: The record reviewed by LUPC does not indicate whether the applicability of 14 CCR §13253 was considered in issuing the Coastal Exemption or whether the December 2024 vegetation removal was evaluated as part of the development. Additional clarification from City Planning is needed regarding the basis for the Coastal Exemption in light of §13253 and the property's location within the Milwood Walk Streets.

C. CEQA – ENV-2026-3123-CE

City Planning determined that the project is categorically exempt from CEQA pursuant to:

- **CEQA Guidelines §15301, Class 1**, relating to alterations of existing facilities; and
- **CEQA Guidelines §15331, Class 31**, relating to rehabilitation of historic resources in a manner consistent with the Secretary of the Interior’s Standards.[2]

The buildings are identified as contributors to the SurveyLA-identified Milwood Venice Walk Streets Historic District. The Office of Historic Resources reviewed the proposed plans

² California Coastal Commission, *Staff Report: Appeal – Substantial Issue and De Novo*, Appeal No. A-5-VEN-16-0021 (Jerome Hunter), April 1, 2016, pp. 8–9 (quoting 14 CCR §13253).

on July 28, 2026 and determined that the rehabilitation complies with the Secretary of the Interior's Standards and will maintain consistency with the historic district.

Planning also determined that none of the exceptions to use of a categorical exemption under CEQA Guidelines §15300.2 applies, including cumulative impacts, unusual circumstances, impacts to scenic-highway resources, hazardous-waste sites, or substantial adverse change to a historical resource.

LUPC Staff Assessment: The record supports the City's reliance on Class 1 and Class 31 for the rehabilitation as approved. The December 2024 removal of mature landscaping is not clearly identified in the project description reviewed by LUPC. The relationship of that prior work to the current project is addressed separately in the Coastal Exemption analysis above.

D. Mello Act

The SPPC determination finds that the project proposes **no physical removal or addition of residential units** and therefore is not subject to the City's Interim Administrative Procedures for compliance with the Mello Act.

This finding concerns the scope of the **current development project**. It is separate from the earlier Ellis Act withdrawal of the six units from the rental market, which is addressed independently in the Tenant History section of this report.

E. Historic-Cultural Monument / Historic Resource Status

The property was nominated for individual Historic-Cultural Monument designation under CHC-2025-1139-HCM, but the Cultural Heritage Commission declined the nomination on May 15, 2025. The denial of individual HCM designation does not alter the buildings' separate status as contributors to the SurveyLA-identified Milwood Venice Walk Streets Historic District, which is the historic-resource status relied upon by Planning and OHR in the SPPC and CEQA analysis.

Photos:



Commission/ Staff Site Inspection--April 8, 2025
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Photos included in Determination Letter for Historic-Cultural Monument application for Marco Place Court, dated April 8 2025.



COURTYARD



BUNGALOW

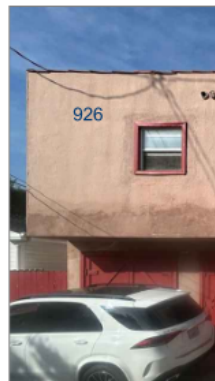
Photos from CEX Application, February 02 2026

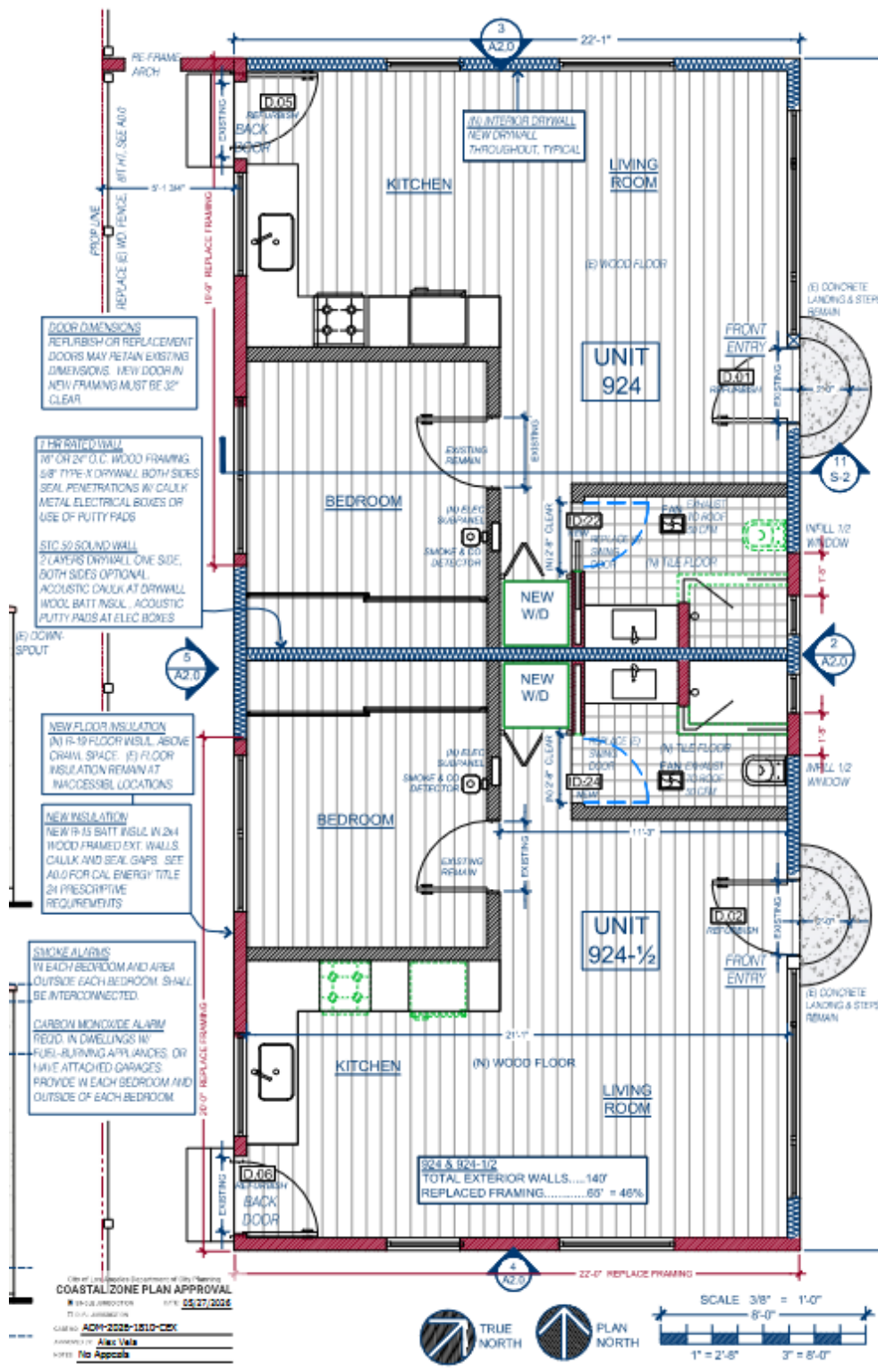
Photos from Red Fin listing, Aug 9 2024

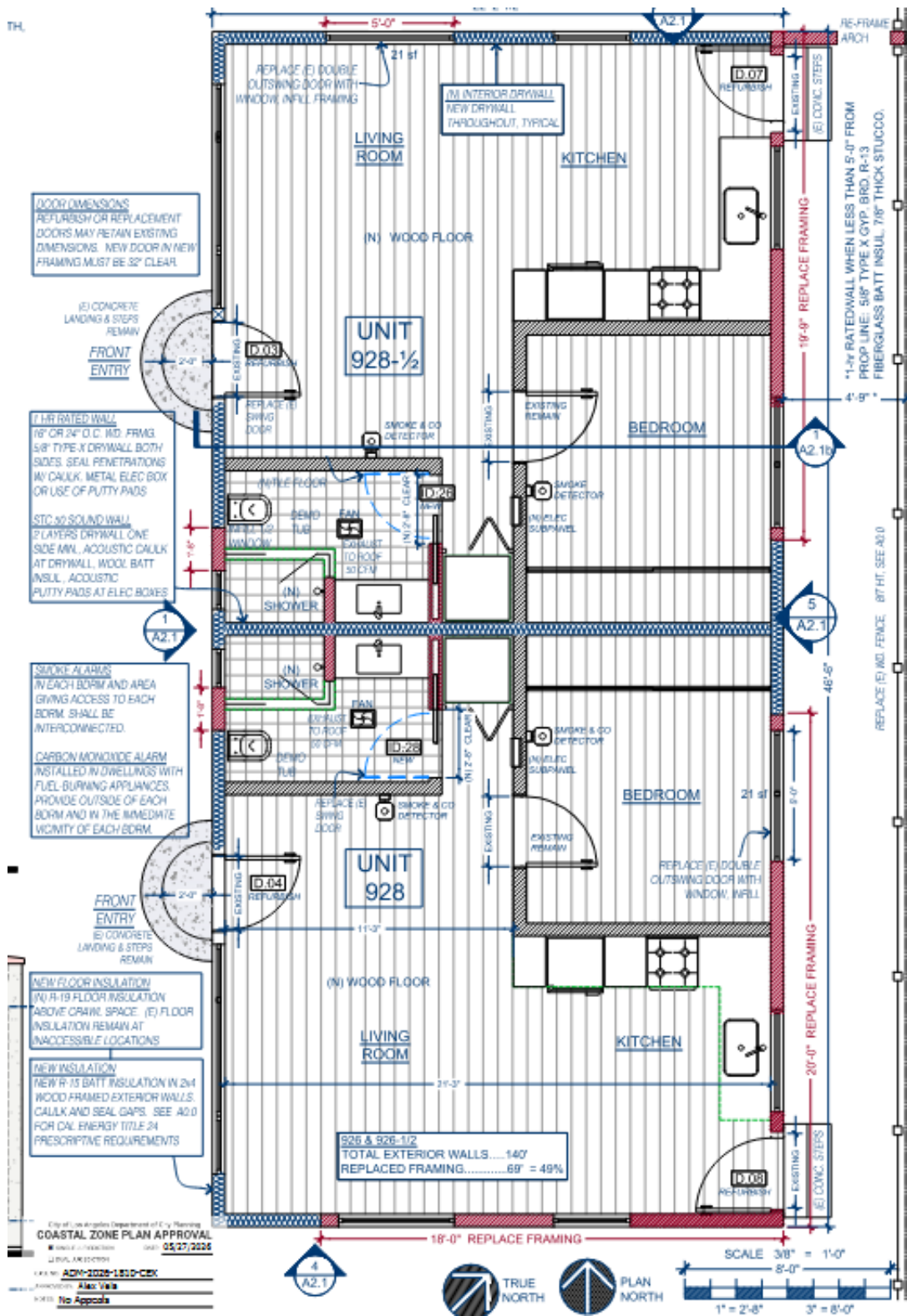


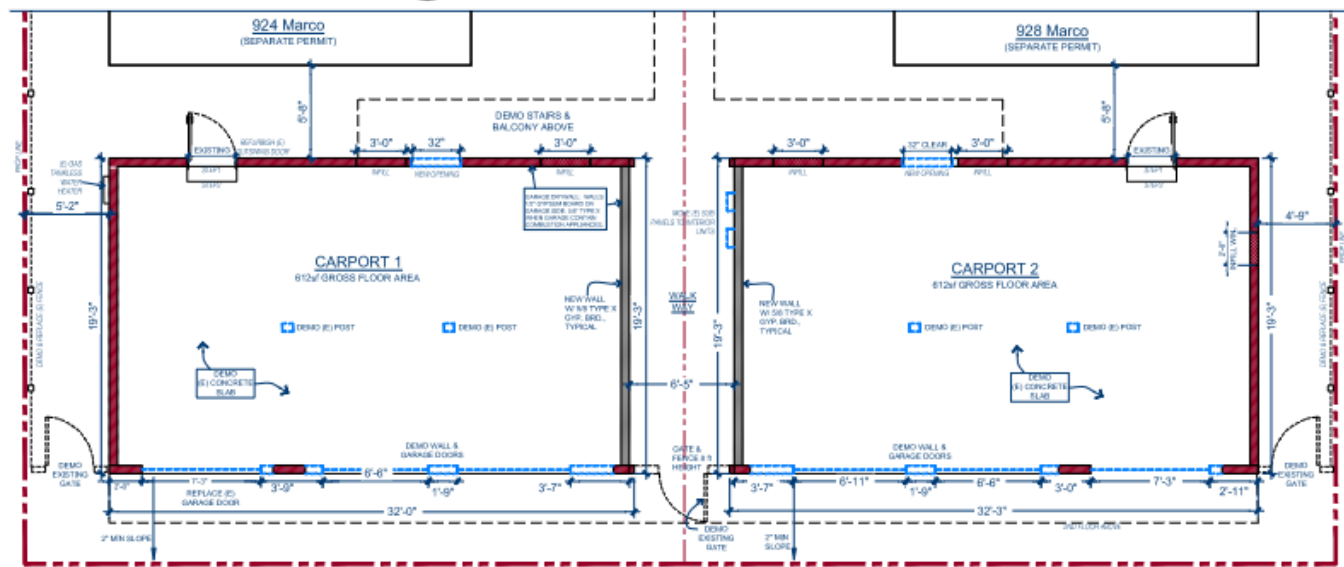
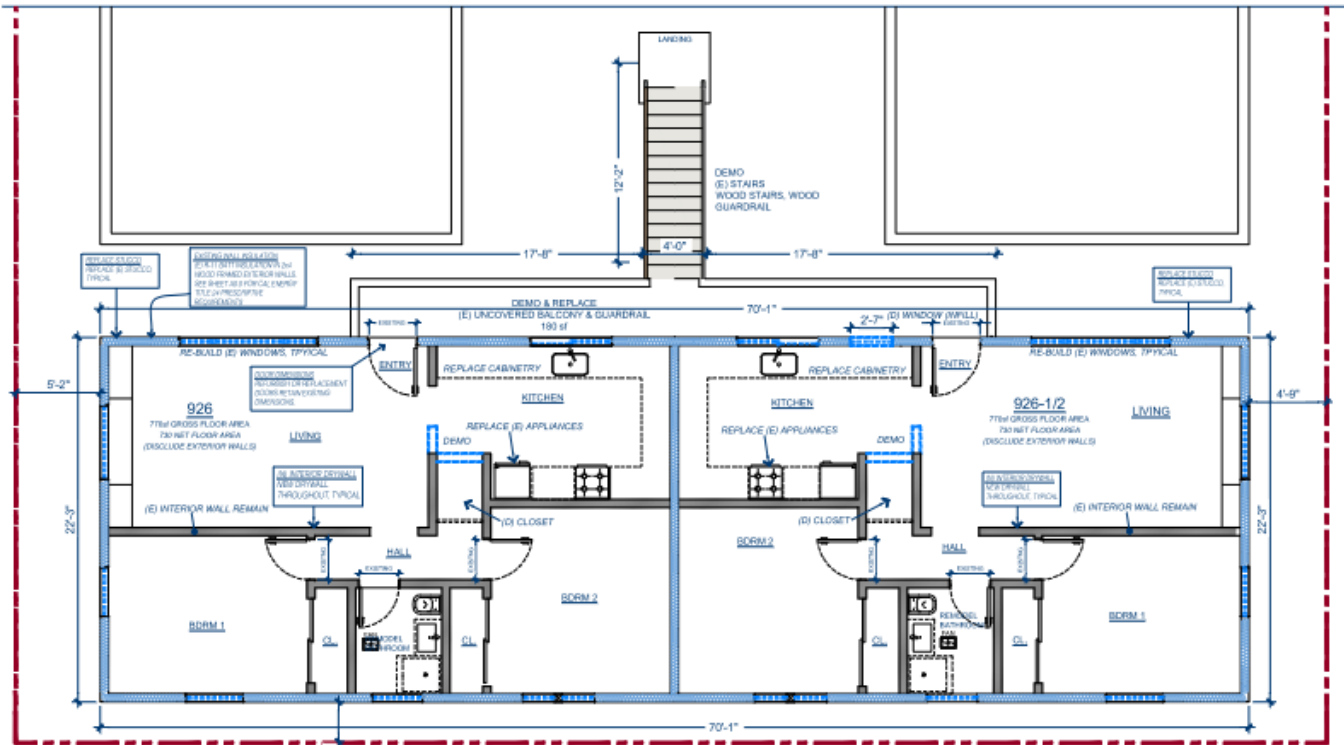


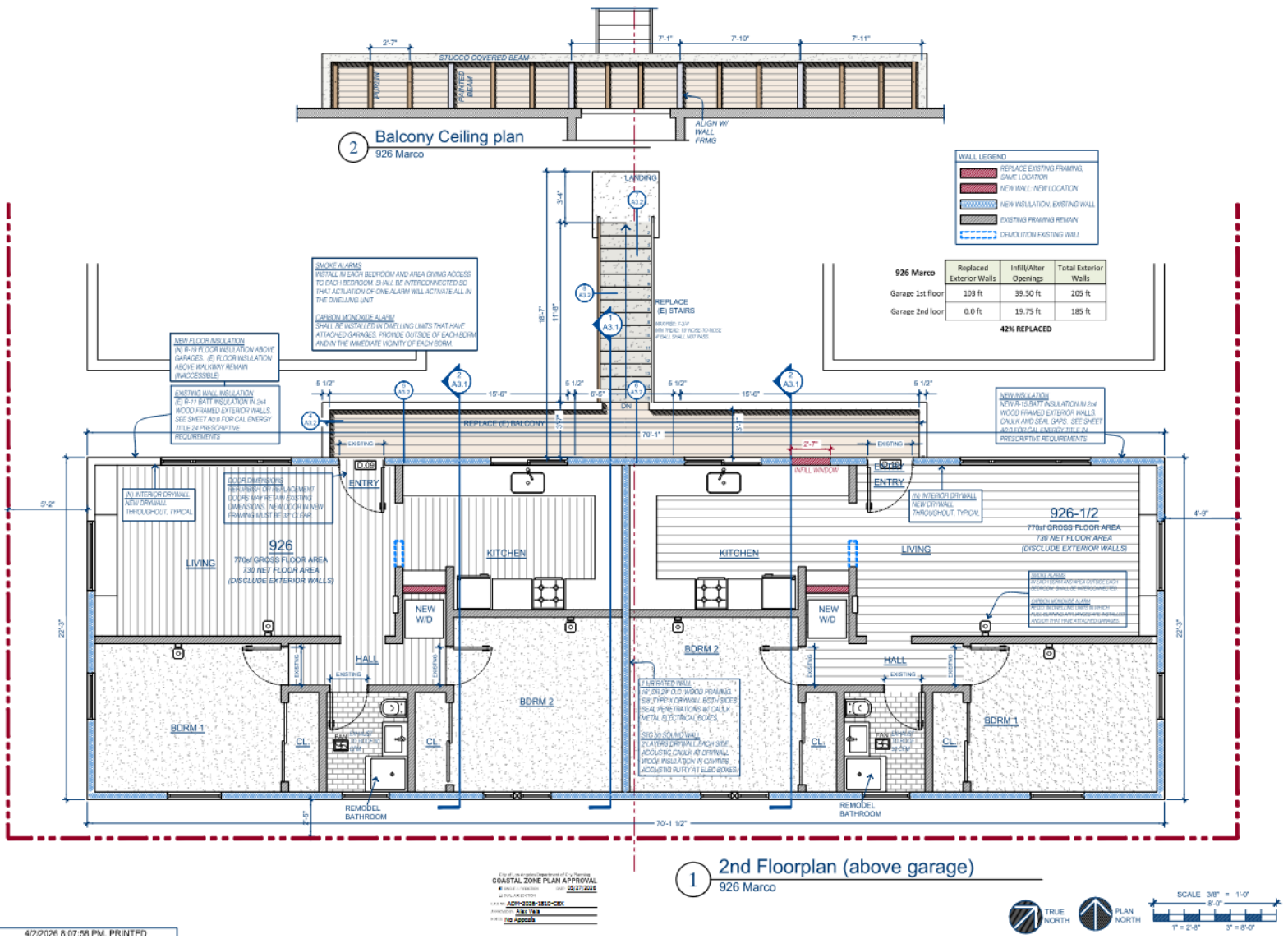
Site Plan:



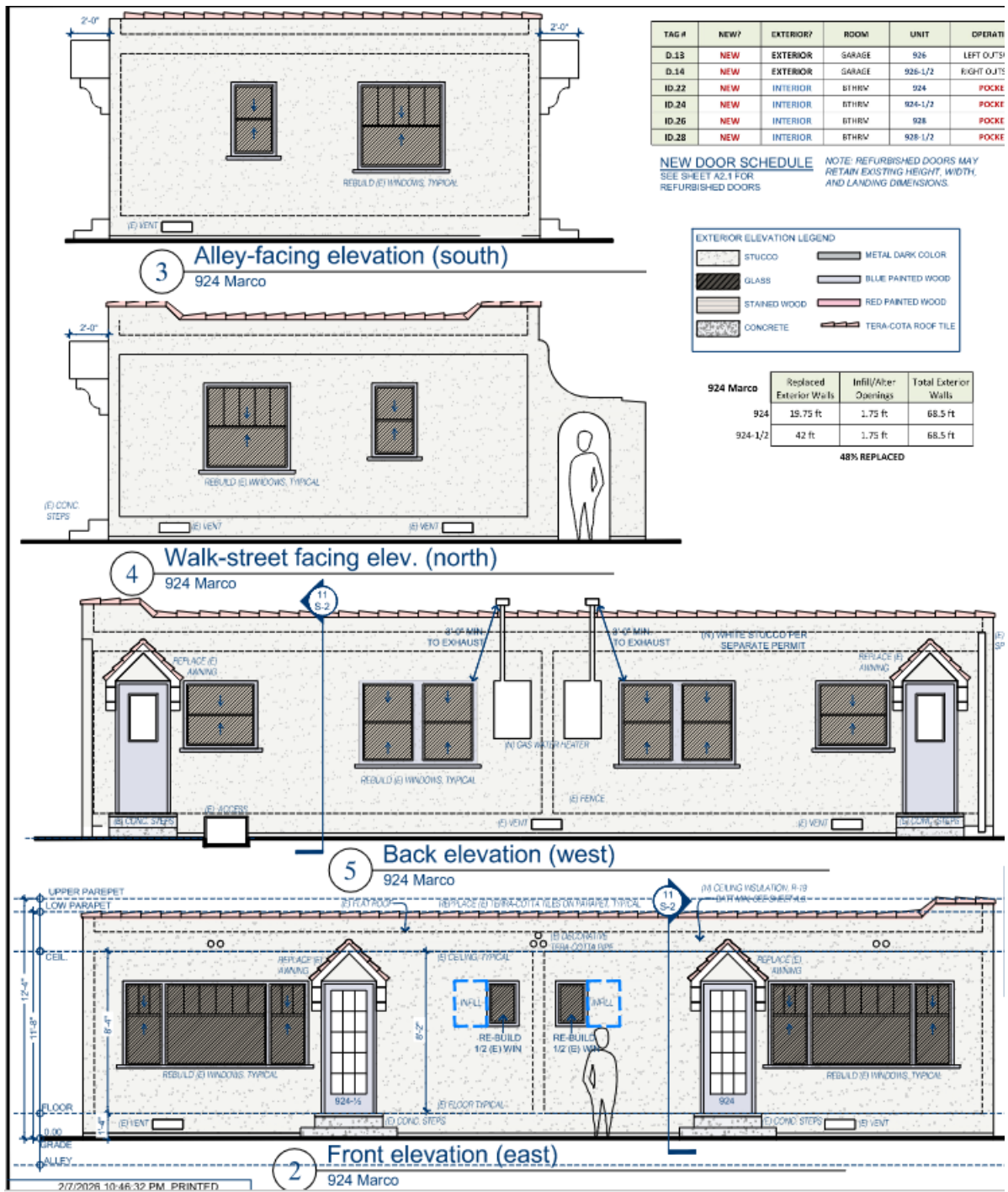


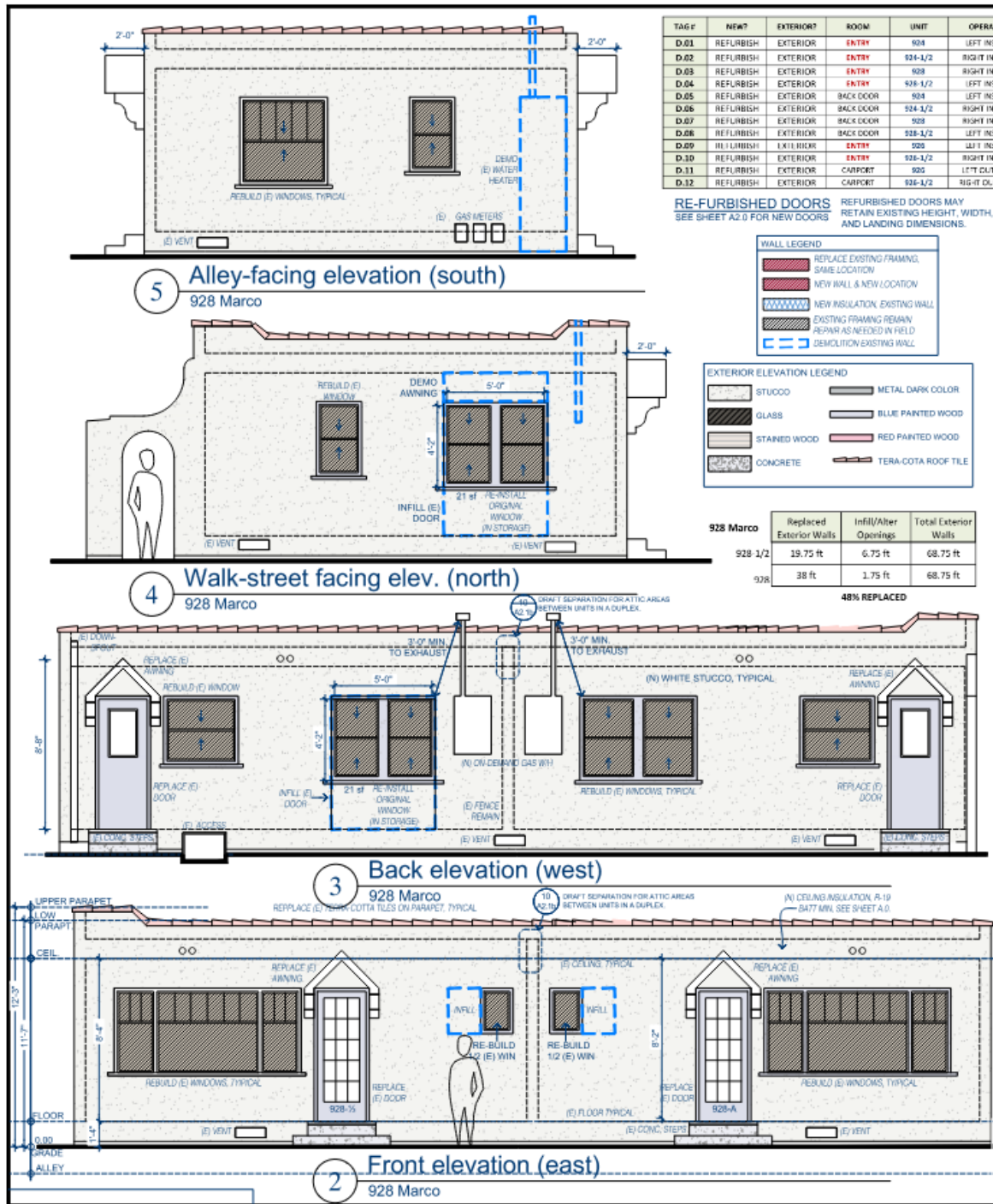


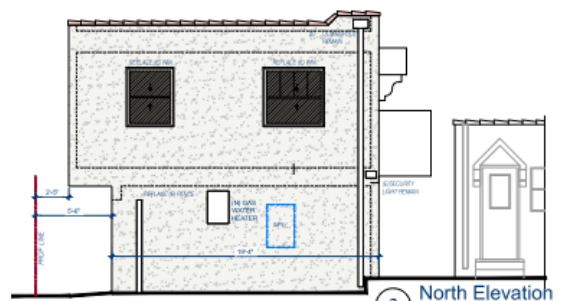




III. Elevations:







EXTERIOR ELEVATION LEGEND

	STUCCO		METAL PANEL
	GLASS		BLUE PANEL
	STAINED WOOD		RED PANEL
	CONCRETE		TERRAZZO

City of Los Angeles Department of City Planning
COASTAL ZONE PLAN APPROVAL
 SPOON JOINTITION DATE: **05/27/2018**
 T.O.P. JOINTITION
 CASE NO: **ADM-2028-1510-CEX**
 APPROVED BY: **Alex Valle**
 NOTE: **No Appeals**

