

VNC Community Plan/LCP
Recommendations to City Planning
General Policy Motions

1. Protection of Areas that Provide Existing Coastal Housing for Low- and Moderate-Income Persons

Whereas, while it is important to increase housing unit density in Los Angeles, it cannot be at the expense of naturally occurring affordable homes currently occupied by long-term community members who, if displaced for new development, are unable to relocate within their community or afford to return when the new development is complete,

Whereas, RSO/rent stabilized units play a crucial role in providing stability, cohesion and socioeconomic diversity for our communities as they safeguard tenants from displacement, exorbitant rent hikes and unjust evictions,

Whereas, the probability of significantly decreased RSO/rent stabilized units and other naturally occurring affordable housing due to Planning's proposed increases in density would significantly impact the housing stability of vulnerable communities such as Venice, and it also increases the potential for homelessness, especially as the statutory relocation fees do not adequately cover ever increasing market rate rents, nor do they equitably accommodate larger households,

Whereas, we must not compromise the stability of the lives of our lower-income community members, many lifelong,

Whereas, the Coastal Act states in section 30116 that areas that provide existing coastal housing for low- and moderate-income persons are "Sensitive Coastal Resource" areas,

Whereas, the Coastal Act requires that Sensitive Coastal Resources be protected,

Whereas, the certified Land Use Plan Policy I. E. 1. states that Venice's unique social diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the Coastal Act,

Whereas, a "community plan" must not displace community members currently living in older housing stock that is RSO/rent stabilized or otherwise affordable or lower cost housing,

Whereas, the "maximum allowable rent levels" for covenanted affordable housing are experiencing higher and higher increases each year due to the impact of market rate units being the vast majority of new rents included in the area median rent calculation,

Whereas, USC professor Manuel Pastor, co-author of the report Rent Matters, states "Housing stability matters because it is associated with physical, social, and psychological well-being; higher educational achievement by the young; and benefits for people of color,"

Whereas, RSO/rent-stabilized and other naturally occurring affordable housing play a crucial role in providing stability, cohesion and socioeconomic diversity for our communities, and

Whereas, the priority of the Venice Community Plan and LCP update must be the preservation and protection of existing RSO/rent stabilized units, other naturally occurring affordable housing, and our existing unique, diverse community, which must take precedence, be the priority over, and supersede any desired land use designation and zoning changes.

Therefore be it resolved, the Venice Neighborhood Council requests that prior to any decision on land use designations and zoning for Venice a report be provided by City Planning identifying the areas of Venice with existing low- and moderate-income housing, including all RSO/rent stabilized units, and that community plan and LCP land use designations and zoning and other appropriate land use regulatory controls be determined such that those areas are protected, including being designated as Sensitive Coastal Resource areas in the LCP for the Coastal Zone.

2. Use State Density Bonus Law and Not "by right" Zoning Code Bonuses in Coastal Zone

Whereas, City Planning is proposing to incorporate "by right" bonuses, expected to be in the future Zoning Code, in the Venice Community Plan/LCP recommendations, but they have not explained the methodology;

Whereas, without knowing what theses unspecified bonuses entail or require, we cannot agree to a given bonus or recommend a change to the Planning recommendations;

Whereas, in the Coastal Zone, for projects with 5 or more total units, the state Density Bonus law (DBL) would be used and a Coastal Development Permit (a discretionary decision) is required; and

Whereas, the DBL permits development "bonuses" in return for providing a specified percentage of total units as affordable housing (as defined in the law – Extremely Low Income, Very Low Income, Low Income, Moderate Income), in a manner that is consistent with both the DBL and the Coastal Act.

Therefore be it resolved, the Venice Neighborhood Council (VNC) requests that the zoning code bonuses included in the City Planning recommendations for the Coastal Zone areas of the Venice Community Plan be removed and, instead, the DBL will be used. Further resolved that the VNC reserves the right to support, object or recommend changes to the zoning code bonuses in future when the methodology is eventually explained and if it is decided they can be used in the Coastal Zone.

3. Existing Infrastructure Needs and Future Infrastructure Needs Must Be Considered

Whereas, in the current City Planning community plan documents there is no analysis of issues related to traffic and infrastructure, rising water table, tsunami risk, poor condition of our water, sewer, and storm drainage systems, and failing canal tidal gates;

Whereas, Venice has experienced significant breakdowns of its infrastructure, including sink holes, sewage overflows contaminating our ocean and beaches, water main breakages, and overflowing storm drains contaminating our streets, oceans and beaches;

Whereas, Venice's infrastructure is especially impacted, more than non-Coastal zone areas, due to the impact of significantly increased use from tourism, which essentially doubles the impact on our infrastructure; and

Whereas, Venice already has very dense traffic, due to both its existing density and to tourism as well as fairly recent significant increased density in neighboring Marina del Rey, in addition to a deficit of parking availability being increased by a reduction in parking spaces due to the Al Fresco dining program and elimination of sites specifically identified in the certified Land Use Plan for future expansion of parking, including the Venice Median and the Metro Bus Depo sites.

Therefore be it resolved, the Venice Neighborhood Council requests that in conjunction with its land use designation and zoning recommendations (separate from and prior to the Environmental Impact Report (EIR) analysis) that City Planning perform an analysis of the condition and remaining life of the existing infrastructure and what is needed in terms of replacement, upgrades and/or repairs to support the current density, including impacts from tourists, as well as an analysis of what is required to support any proposed density increases, including whether additional parks, schools, bike lanes, or other additions would be provided.

4. Study of Existing Zoning Capacity Needed

Whereas, Venice is already a very dense community, one of the densest in Los Angeles, and a substantial percentage of its land uses is already dedicated to multi-family zones (excluding East Venice);

Whereas, the 2004 Venice Community Plan states that the zoning allows for density for a population of 46,000 by 2010 and the current population is approximately 38,000;

Whereas, significant opportunity already exists to increase (and stop decreases of) housing density (units), including by adding ADUs, making building to currently allowed density more feasible by decreasing parking requirements, utilizing the state Density Bonus law, utilizing SB 9, stopping illegal conversion of housing to short term rentals and de facto hotels and requiring reinstatement to housing for those already converted, (proposed) regulations to prohibit owners from leaving units vacant, regulating to stop property owners from decreasing density, and enforcing the Home Sharing Ordinance;

Whereas, it does not appear that effective emergency response to Tsunami, earthquake, major flooding or other emergency and existing difficulty in evacuation, as well as increased difficulty if density is increased, have been considered; and

Whereas, without knowing what existing zoning can accommodate, we cannot determine what changes to zoning are required to meet the state-mandated increases in density.

Therefore be it resolved, the Venice Neighborhood Council requests that City Planning prepare a study of Venice’s existing zoning capacity to determine what more can be built with the current zoning.

5. Environmental Analysis and Policies Needed Prior to Making Land Use/Zoning Changes

Whereas, there are many policies and requirements in the Coastal Act, the existing certified Land Use Plan and the existing Venice Community Plan related to environmental issues that affect development, including protection of existing and enhancement of tree canopy, sea level rise and increased flood hazards;

Whereas, there is a need for light, airflow, open space and open sky for quality of life and psychological and physical wellbeing;

Whereas, it does not appear that such Coastal Zone policies and other requirements have been considered in Planning’s current community plan proposal;

Whereas, lack of adequate planning related to and in addressing these issues has an effect on the cost and availability of insurance in coastal areas;

Whereas, a certified Local Coastal Program (LCP) approval is considered the statutory equivalent to an Environmental Impact Report (EIR) and therefore the LCP must address all environmental issues;

Whereas, waiting to prepare the EIR for all of the Westside community plans together, before environmental issues are considered in the Coastal Zone area of the community plan, determining land use designations and zoning first, is the wrong order--putting the cart before the horse; and

Whereas, the land use policies should be proposed before the implementation of those policies via the zoning is proposed.

Therefore, be it resolved that the Venice Neighborhood Council requests that City Planning prepare the community plan policies regarding the Coastal Zone environmental issues prior to recommending land use designation/zoning changes.