

## 3.8 Land Use and Planning

This section describes the affected environment and regulatory setting for land uses and planning related to the Project Site and surrounding area. It also describes the potential land use and planning impacts that would result from implementation of the Venice Auxiliary Pumping Plant (VAPP or Proposed Project). As noted in the analysis below, direct impacts associated with land use and planning during construction or operation of the Proposed Project would be less than significant and no mitigation measures are required. However, the Proposed Project would result in significant and unavoidable secondary impacts on surrounding land uses, related to construction noise and vibration, even with mitigation incorporated.

### 3.8.1 Regulatory Setting

#### 3.8.1.1 California Coastal Act of 1976

The Coastal Act was enacted in 1976 by the California legislature, which established it as the primary law that governs the decisions of the California Coastal Commission (Commission). It was created in 1972 through the California Coastal Conservation Initiative and Proposition 20. The Coastal Act outlines standards for development within the Coastal Zone that seek to balance the right to develop with strong environmental policies aimed to protect coastal resources. The 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. It encompasses 1.5 million acres of land and is bounded by the ocean on the west and an inland easterly boundary that traverses along the entire California coast.

The State of California's basic goals for the Coastal Zone are to (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 resources 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; (e) encourage state and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone.

The Coastal Act is designed to empower local governments to create Local Coastal Programs (LCPs) as land use policy to govern decisions that determine the conservation and the best use of coastal resources. LCP's are usually incorporated into a city's general plan for areas within that jurisdiction's Coastal Zone. Until the Coastal Commission certifies an LCP, the Commission makes the final decisions on all development within a city within the Coastal Zone and has appellate authority. Chapter 3 of the Coastal Act includes the standards used by the Commission in the review of coastal development permits and LCPs. It governs all development along the Coast and mandates protection of public access, recreational opportunities, and marine and land resources.

## **Venice Coastal Zone**

The Venice Coastal Zone is within the California Coastal Zone and is generally bounded by Marine Street on the north; the city/county boundary, Washington Boulevard and Via Marina on the south; Lincoln Boulevard and Via Dolce on the east; and the Pacific Ocean on the west.

### **3.8.1.2 City of Los Angeles General Plan**

A general plan is required by the State of California to address the specified provisions of seven mandated elements land use, circulation, housing, conservation, open space, noise, and safety—to the extent that the provisions are locally relevant. The City of Los Angeles General Plan contains eleven elements, including a Framework, Air Quality, Health, and Service Systems/Public Recreation. Instead of a Circulation Element, the City of Los Angeles has a Mobility Element.

The City of Los Angeles General Plan is a comprehensive, long-term declaration of purposes, policies, and programs for the development of the city. It provides land use policies that meet the existing and future needs and desires of the community.

#### **General Plan Framework Element**

The General Plan Framework Element (GPFE) is a strategy for long-term growth that sets a citywide context to guide subsequent amendments to the City's community plans, zoning ordinances, and other pertinent programs. The GPFE responds to state and federal mandates to plan for the city's future. An Environmental Impact Report (EIR) that analyzes the GPFE and its consistency with the California Environmental Quality Act (CEQA) was also prepared.

The Residential Citywide Design Guidelines (RCDG) are part of the City's GPFE and serve to implement the City's 10 Urban Design Principles (see Table 3.8-1). The RCDG do not supersede regulations in the Los Angeles Municipal Code (see discussion below). They contain options, solutions, and techniques to achieve the goal of excellence in new design. Through the Department of City Planning's Urban Design Studio and the Development Services Center, the RCDG and the 10 Urban Design Principles function as a design program for the City that helps communicate design expectations to applicants during the design phase of their projects. They facilitate the application of design objectives and encourages high-quality development that is appropriate to the context of the city's climate and urban environment. The 10 Urban Design Principles are a statement of the City's vision for the future of Los Angeles, providing guidance for new development and encouraging projects to complement existing urban form in order to enhance Los Angeles' built environment. The 10 Urban Design Principles are intended to apply to a variety of urban forms that exist within Los Angeles, from the most dense and concentrated city centers to suburban areas.

#### **Land Use Element**

The Land Use Element includes Community Plans that establish policy and standards for each of the 35 geographic areas in the city. Each community plan is focused on specific geographic areas of the city and, therefore, include more specific policies and programs than those developed for the city as a whole.

Community Plans are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community. The Community Plans also guide

**Table 3.8-1. The 10 Principles of Urban Design**

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1.	Develop inviting and accessible transit areas.
2.	Reinforce walkability, bikeability and well-being.
3.	Nurture neighborhood character.
4.	Bridge the past and the future.
5.	Produce great green streets.
6.	Generate public open space.
7.	Stimulate sustainability and innovation in our city.
8.	Improve equity and opportunity.
9.	Emphasize early integration, simple processes and maintainable solutions.
10.	Ensure connections.

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Source: City of Los Angeles, 2009.

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development by establishing the City's goals, policies, and development standards with the objective of creating a healthy and pleasant environment. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community through 2010. The Community Plans are intended to coordinate development among the various parts of the city of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of their communities and compatible with infrastructure and public services. The City is currently in the process of updating a number of community plans.

### **Safety Element**

Planning and preparedness are critical in mitigating the extent of the impacts of a disaster, through pre-disaster abatement, pre-disaster response preparation and post-disaster recovery plans. The state identifies local safety elements as key tools for assisting local jurisdictions in organizing their hazard mitigation, disaster response, and recovery efforts. The Safety Element of the City of Los Angeles General Plan provides a contextual framework and overview of the city's natural hazards (fire, flood, earthquake, landslides, and other hazards), hazard mitigation, and emergency response operations. The Safety Element also contains goals, objectives, policies, and City Emergency Operations Organization (EEO) programs.

To further address issues concerning seismic safety and resilience, the Mayoral Seismic Safety Task Force recently undertook an evaluation of buildings and water systems and telecommunication infrastructure. Their findings and recommendations are presented in the City of Los Angeles' Resilience by Design report. The intent of the report is to identify ways to protect residents' lives and the economy, improve response to earthquakes, and prepare for quick recovery from earthquakes.

### **Conservation Element**

State law intends that conservation elements address "conservation, development, and utilization of natural resources including water and hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources." State general plan legislation was amended (1995) to require that preparation of the water portion of the general plan address water and land reclamation, water (including ocean) pollution, regulation and use of land in stream beds, erosion, watershed protection, flood control and rock, sand and gravel resources.

The Conservation Element of the City of Los Angeles General Plan surveys laws, requirements, and procedures that have been established for the protection of natural resources. It primarily is an informational document, which is designed to help readers understand the context, history, and opportunities for protection and improvement of the city's natural resources.

## **Open Space Element**

The Open Space Element of the City of Los Angeles General Plan provides information to guide city citizens and decision makers with the identification, preservation, conservation, and acquisition of open space in the city of Los Angeles. The Open Space Plan includes the regulation of publically owned land as well as privately owned land for the public's benefit and protection from land misuse.

## **Plan for a Healthy Los Angeles**

The Plan for a Healthy Los Angeles (Plan) is a new Health and Wellness Element of the City's General Plan. It focuses on public health and safety to address basic quality-of-life issues, including safe neighborhoods and healthy foods, which will help the City of Los Angeles achieve better health and social equity. In the Plan, existing health-oriented policies are promoted while new policies are created to make Los Angeles a healthier place to live, work and play.

## **Mobility Element**

The Mobility Element of the General Plan (Mobility Plan 2035) was updated in 2015. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element (last adopted in 1999), Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how future generations interact with the streets in Los Angeles. The California legislature adopted AB 1358 in 2008, *The Complete Streets Act*, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context."

Complete streets are designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders. Some public benefits include improved transportation, a cleaner environment, and healthier neighborhoods. Complete streets offer safety, comfort, and convenience for all users. It enhances mobility and active transportation through multi modal connectivity and providing people the ability to utilize the public space to exercise, work, engage in community activities, interact with their neighbors, and beautify their surroundings. The City's transportation system will continue to evolve to fit the context of the time and situation.

Mobility Plan 2035 includes goals that define the City's high-level mobility priorities. Each of the goals contains objectives that are targets used to help measure the progress of the Plan and policies, broad strategies that guide the City's achievement of the Plan's five goals: (1) Safety First, (2) World Class Infrastructure (3) Access for All Angelenos (4) Collaboration, Communication and Informed Choices, and (5) Clean Environments & Healthy Communities.

The purpose of Mobility Plan 2035 is to present a guide to the further development of a citywide transportation system that provides for the efficient movement of people and goods. Mobility Plan 2035 recognizes that primary emphasis must be placed on maximizing the efficiency of existing and

proposed transportation infrastructure through advanced transportation technology, through reduction of vehicle trips, and through focusing growth in proximity to public transit. In addition, the Plan sets forth street designations and related standards. A listing of street types with descriptions and generalized cross sections for each designation is included in the *Complete Street Design Guide*. Mobility Plan 2035 recognizes the contribution of a proper mix of land uses to reduce vehicle trips. Uses that better serve the needs of the population closer to where they work and live reduces the number and distance of vehicle trips and decreases the amount of pollution from mobile sources.

### **Air Quality Element**

The City's Air Quality Element accounts for economic and social growth and goals while achieving National and State Ambient Air Quality Standards. The Air Quality Element intends to keep population and economic growth in check to reduce environmental degradation and maintain a balance of urban systems with citywide elements, community plans, and neighborhood plans.

### **Noise Element**

The Noise Element references the City's noise standards to address noise sources, mitigation strategies, and management programs. The Element also addresses the different federal, state, and City jurisdiction as it relates to automotive, aircraft, and nuisance noise. While regulation of vehicular noise is outside of a City's control, regulating land use, implementing federal and state regulations, and enforcing nuisance noise are within a city's authority and therefore, discussed in the Noise Element.

### **Service Systems/Public Recreation Element**

The Public Recreation Plan emphasizes neighborhood and community recreational sites and parks. It includes policies and programs to meet the needs for community buildings, swimming pools, and tennis courts. The objectives for the Public Recreation Plan are based on recognized planning principles and the extent and nature of deficiencies in the City's recreational facilities and are as follows: (1) To provide a guide for the orderly development of the City's public recreational facilities, (2) To provide long-range standards for use in connection with new subdivisions, intensification of exiting residential development or redevelopment of blighted residential areas as described under general local recreation standards, (3) To develop and locate public facilities to provide the greatest benefit to the greatest number of people at the least cost and with the least environmental impact, (4) To provide a guide of priorities for the acquisition and development of public recreational facilities; and (5) To further refine and carry out the goals and objectives set forth in the Concept and Citywide Plan for recreation.<sup>1</sup>

#### **3.8.1.3 City of Los Angeles Administrative Code**

The City of Los Angeles Administrative Code is used to assist City offices, departments, and other governmental agencies with their functions, and serves as the official source for information about ordinances enacted by the City of Los Angeles that regulate administrative processes.

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<sup>1</sup> Source: [http://planning.lacity.org/Code\\_Studies/GeneralElement/PublicRecreationPlan.pdf](http://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf). Accessed August 25, 2016.

## Section 19.85 Public Works Improvements Arts Program

The mission of the City of Los Angeles Public Works Improvements Arts Program (“Program”) is to:

Provide publicly accessible works of art, arts and cultural facilities, and services for the cultural benefit of the city, its citizens and its visitors.

The Program was established to connect all City capital improvement projects with the opportunity to create art installed at facilities, enhance amenities, assist with the restoration of historic features, and provide community art services throughout the city. The Program is managed by the Department of Cultural Affairs (DCA) and its General Manager.

The goals of the Program are:

- To provide appropriate forms of artistic and cultural expression in all City capital improvement projects;
- To integrate the work of artists into the design and planning of capital improvement projects;
- To ensure that the selected art programs serve the needs of the people using the capital improvement projects;
- To ensure that qualified artists of all genders and ethnic groups are represented;
- To provide a variety of arts and cultural activities; and
- To ensure the highest of level of artistic excellence.

All City capital improvement projects, whether funded by Council controlled or proprietary departments, must comply with this Program. The funds can be used for projects in many different ways. There is a formal consultation process that the sponsoring agency must go through that is determined by the Department of Cultural Affairs. Inter-agency consultations initiate the process.

All public art projects are reviewed by the Public Art Committee and recommended for approval by the Cultural Affairs Commission.

According to the Department of Cultural Affairs, the approval process consists of 1) completing the Application for Approval of Public Artwork, and gathering requested supporting materials; 2) submitting an application to the Public Art Division; 3) scheduling dates to present the art project to the Public Art Committee and Cultural Affairs Commission; 4) appearing before the Public Art Committee to receive feedback and be recommended for approval to the Cultural Affairs Commission; and 5) appearing before the Cultural Affairs Commission to receive a conceptual and/or final approval.<sup>2</sup>

There is an option for an Exemption to this Section of the LAMC that allows for Public Works Projects to pay the 1% of the total project budget to the Department of Cultural Affairs, in lieu of using the funds for public art on the Project Site.

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<sup>2</sup> Source: <http://culturela.org/percent-public-art/public-works-improvements-arts-program-pwiap/>. Accessed August 25, 2016.

### **3.8.1.4 City of Los Angeles Municipal Code**

The City of Los Angeles Municipal Code (LAMC) includes standards for different land uses and identifies land uses that are allowed in various zoning districts. Specifically, it consolidates and coordinates all existing zoning regulations and provisions in order to designate, regulate, and restrict locations and land uses.

#### **Section 12.09.5 “RW2” Residential Waterways Zone**

Section 12.09.5 of the LAMC is the “RW2” Residential Waterways Zone established by Ordinance No. 138,095. It established regulations that make possible the utilization of certain lots fronting on navigable public canals or waterways, or separated therefrom only by a public street, which make up, or are a portion of, a sizable system of recreational waterways when such lots are predominantly those which were recorded prior to June 1, 1946.

Because of exceptional past history, present conditions, the proximity of such lots to recreational water areas, and their usual location in areas which enjoy optimum climatic conditions, the best development of the property may require variation from some of the standard housing requirements necessary or desirable to the rest of the city.

#### **Section 99.00 Los Angeles Green Building Code**

Section 99 of the LAMC is the Los Angeles Green Building Code (LAGBC) and adopts by reference the California Green Building Standards Code (CAL Green Code). This code applies to the construction of all new buildings, all building alterations with a building permit valuation of over \$200,000, and all building additions. This includes construction, alteration, replacement, repair, use and occupancy, and demolition of all structures connected to applicable buildings.

#### **Venice Local Coastal Program**

Section 30500 of the California Coastal Act establishes that Local Coastal Programs (LCP) govern decisions that determine the short- and long-term conservation and protection of coastal resources. A LCP specifies appropriate location, type, and scale of new or changed uses of land and water within the California Coastal Zone and also addresses planning and land use conformity with Coastal Act goals and policies. A Venice LCP was created to serve as a basic planning tool used by the City of Los Angeles to guide development in the Venice Coastal Zone, in partnership with the Coastal Commission. The Venice LCP was intended to contain the policies for future development and protection of coastal resources in the community of Venice.

The Venice LCP was adopted by the Los Angeles City Council and then was submitted to the Coastal Commission for their review for consistency with Coastal Act requirements. The Venice LCP included a Venice LCP Land Use Plan and the Venice Specific Plan to implement the plan. Both documents are used locally by the City of Los Angeles Department of City Planning to regulate development within the Venice Coastal Zone. Per the CA Coastal Act, a Venice Local Coastal Program (LCP) was presented to the California Coastal Commission in 2001. The Venice Land Use Plan was certified but the Venice Implementing Ordinance (Venice Specific Plan) was ultimately not certified. As a result, determinations for Coastal Development Permits (CDPs) are split, with applicants within the Dual Jurisdiction Zone processing their case through both the City of Los Angeles and the CA Coastal Commission while applicants within the Single Jurisdiction Zone were allowed to choose whether to process their case through the City of Los Angeles or the CA Coastal Commission. Currently, the City of Los Angeles does not have a certified Local Coastal Program for the Venice Coastal Zone.

### **Venice Coastal Zone Specific Plan (Venice Specific Plan)**

Ordinance No. 172,897 established the Venice Specific Plan and created eight sub-areas within the Venice community. The Venice Specific Plan is intended to comply with the California Coastal Act of 1976 for development within the Venice Coastal Zone. The purpose of the Venice Specific Plan is to implement the policies and goals of the California Coastal Act and to address the unique conditions within the Venice Coastal Zone that must be consistent with the Los Angeles General Plan. It regulates all development, including use, height, density, setback, buffer zone, and other factors in order that it be compatible in character with the existing community and to provide for the consideration of aesthetics and scenic preservation and enhancement, and to protect environmentally sensitive areas.

### **Venice Local Coastal Program Land Use Plan**

The Venice Local Coastal Program Land Use Plan (Venice LCP-LUP) is intended to serve as the Local Land Use Plan of the Venice LCP. It was prepared to comply with the California Coastal Act of 1976 for development within the Venice Coastal Zone and was certified by the California Coastal Commission in June 2001. The purpose of the Venice LCP-LUP is to define goals and land use policies for compliance with the California Coastal Act. It is intended to restore the overall quality of the Venice Coastal Zone environment and its natural and man-made resources and assures that public coastal access and public recreation areas are provided as required per the Coastal Act.

#### **3.8.1.5 Land Use Entitlements for Project**

The VAPP includes the construction of a new pumping plant with a two-story electrical building and control facility, three submersible pumps, and an associated valve and metering vault. It also includes the improvement of an adjacent vacant lot (128 Hurricane Street) that will contain eight parking spaces, open space, and the potential for public art (see Figure 2-2 in Chapter 2, Project Description, of this EIR). The design of the building and accessory uses include encroachment of a structure over six feet into the rear yard and eight parking spaces. This project is considered a Public Facilities use, which is not allowed by right in a RW2-1 zone or in a Medium Residential land use designation. The VAPP will need several land use entitlement approvals in order to be constructed. The City is evaluating various options: (1) Venice Specific Plan Project Compliance; (2) Public Benefits Project Compliance with Alternative Compliance; (3) RW2-1 Adjustment for Open Space; (4) and a Conditional Use for Parking. A local Coastal Development Permit and a state Coastal Development Permit are also required.

### **Venice Specific Plan Project Permit**

The Venice Specific Plan Project Permit Compliance Review determination is issued for projects within the a Venice Coastal Zone. Venice Specific Plan projects are those projects located within the Venice Coastal Zone. The Director of Planning is the Approval Authority for a Venice Specific Plan Project Permit Compliance Review and must make findings of consistency with the Venice Specific Plan Findings. The Venice Specific Plan Project Permit Compliance Review is processed in compliance with Section 11.5.7 of the LAMC.



## **Public Benefits Project Permit Compliance**

The Proposed Project has the option to pursue a Public Benefits Project Permit. The Proposed Project has uses that are applicable and can be permitted via a Section 14.6 Public Facility Public Benefits Project permit, with Alternative Compliance. Proposed uses, such as the Proposed Project, are permitted in any R zone (residential), provided these uses meet the performance standards or alternative compliance measures approved for the uses. Section 14.6 Public Facility Public Benefits Project indicates the following:

Public utilities and public services uses and structures in the R zone include Performance Standards that provide for height, yards, setbacks, scale, landscaping, and open space, especially with the main buildings similar to other properties in the neighborhood. Signage, noise levels adjacent to residential uses should not be used at times or in a manner that would be disturbing to neighbors. Public telephones should not be located to encourage unwanted loitering. Sufficient off-street parking should be provided. The proposed use should be designed to minimize loitering on or near the site. The project should provide safe vehicular ingress and egress with no increase in traffic level of service to accommodate expected usage by the public and/or occupants of the facility, especially police and fire safety. Lighting should not reflect into nearby residential areas. Walls, fences, or other visible security devices should be similar to what is in the surrounding neighborhood. Graffiti should be monitored and removed immediately from site.

## **Adjustment for Yards**

Section 12.28 of the LAMC authorizes a Zoning Administrator to grant adjustments to yard requirements. Although the Proposed Project has the option to pursue a Public Benefits Project Permit, it will be required to comply with the LAMC Section 12.09.5 RW2-1 Residential Waterways Zone yard requirements. Since the Proposed Project has an encroachment of over six feet within the rear yard, a YardAdjustment can remedy this issue, thereby bringing the Proposed Project into compliance with this requirement. A Yard Adjustment is appealable to the Area Planning Commission.

## **Conditional Use Permit for Parking**

Parking on the Project Site will be located on the vacant lot located at 128 Hurricane Street. Per the Venice Specific Plan, the Proposed Project will require at least five on-site project automobile parking spaces. Since the parking would be located on an adjacent lot within 750 feet of the VAPP Project Site, a Conditional Use Permit for Parking will be required. The total number of parking spaces that will be provided on the 128 Hurricane Street lot is eight.

The initial decision on a Conditional Use application requires City Planning Commission consideration and is appealable to the City Council and/or Mayor. The Planning Commission has a range of findings it can make, including approval in whole or in part with or without conditions, or denial of the application. In addition, a public hearing must be held and three Findings of Approval must be granted and include the following: (1) That the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region; (2) That the project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety; and (3) That the project substantially conforms with the purpose, intent, and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

### 3.8.1.6 Proposed Project Coastal Development Permits

The Proposed Project must obtain a local Coastal Development Permit and a state Coastal Development Permit from the California Coastal Commission. Coastal Development Permits are regulatory permits that projects located in the California Coastal Zone utilize to ensure compliance with the California Coastal Act. Coastal Development Permit authority for the Proposed Project is delegated to the California Coastal Commission, since the Venice Coastal Zone does not have a California Coastal Commission certified Local Coastal Program. For public infrastructure projects and those projects constructed in the public right of way, the City Engineer at the Los Angeles Department of Public Works, Bureau of Engineering, makes findings of consistency with the policies of the Coastal Act at a local level and has the authority to issue local Coastal Development Permits. For private projects, to support the planning entitlements process, the Department of City Planning, through the Venice Specific Plan and the Venice Coastal Land Use Plan, also evaluate consistency with the Coastal Act and have the authority to issue local Coastal Development Permits. For the Proposed Project, the Departments of Public Works and City Planning will work together to ensure that the Proposed Project is consistent with the Coastal Act, Venice Specific Plan, and Venice Coastal Land Use Plan.

### 3.8.2 Environmental Setting

This section describes the environmental setting or conditions related general plan land use, zoning, and applicable plans. The information in this section is used in preparing the evaluation and conclusions of the impact analysis as well as determining the required mitigation measures.

As described in Chapter 2 (Project Description), the Project Site comprises three undeveloped vacant Residential lots, zoned RW2-1. All three lots are owned by the City of Los Angeles and located next to the existing Venice Pumping Plant (VPP). The site addresses are 3813 and 3817 South Esplanade and 128 Hurricane Street (Laydown Area 1). The three lots are not contiguous and are separated by Hurricane Street and Canal Court (see Chapter 2, Figure 2-2, Project Location Map, of this EIR).

There are three construction Laydown Areas that will be used for materials and equipment storage and for construction staging during the anticipated 2-year construction period. Laydown Area 1 is located at 128 Hurricane Street, which is already part of the Project Site. Laydown Area 2 is comprised of two lots that are located at 3819 and 3821 Via Dolce across the Venice Grand Canal, east of the Project Site and is accessed from Via Dolce. Laydown Area 3 is located at 9940 Jefferson Boulevard in Culver City, which is approximately 7 miles west of the Project Site. Laydown Area 3 is owned by the City of Los Angeles.

The Project Site is highly urbanized within the Ballona Lagoon West sub-area of Venice, north of Ironside Street. It contains a mix of residential, open space, and public facility land uses. The Proposed Project is considered infill development. North and west of 3813 and 3817 South Esplanade are single- and multi-family residential uses. To the east is the Venice Canal System, which is designated as open space. To the south is the VPP, which is a public facilities land use.

The 128 Hurricane Street lot is bounded by the Ballona Lagoon to the south, Hurricane Street to the north, multi-family residential to the west, and Canal Court and the VPP to the east.

Laydown Areas 1 and 2 are bounded by single- and multi-family residences to the north, south, and east and by multi-family residences and the Grand Canal to the west.

Laydown Area 3 in Culver City is located within a light industrial/commercial area and adjacent to educational uses (i.e., West Los Angeles College).

### 3.8.2.1 General Plan Zoning and Land Use Designations

#### Zoning

##### Los Angeles Municipal Code

The Project Site and Laydown Areas 1 and 2 are located in the RW2 Zone. This designation includes lots that front on navigable public canals or waterways that may have historical significance, unique present conditions, close proximity to recreational water areas, and are located in areas that enjoy optimum climatic conditions. The RW2 Zone has the following requirements:

- **Use** - Residential and Accessory Uses
- **Area** - No building or structure shall be erected or maintained nor shall any building or structure be enlarged unless the following yards and lot areas are provided and maintained in connection with such building, structure or enlargement:
  - **Front Yard** - 15 feet
  - **Side Yards** - not less than ten percent of the width of the lot, but in no event of less than three feet in width.
  - **Rear Yard** - There shall be a rear yard of not less than 15 feet in depth. Notwithstanding any provisions of this article to the contrary, the rear lot line is that line opposite and most distant from the lot line separating the narrowest canal frontage of the lot from the navigable public canal or waterway.
- **Lot Area** - Every lot shall have a minimum width of 28 feet and a minimum area of 2,300 square feet. The minimum lot area per dwelling unit shall be 1,150 square feet.
- **Open Space** - Same as required in "RW1" Zone - Section 12.08.5 C.5.

##### Culver City Municipal Code

Laydown Area 3 in Culver City is zoned Industrial General (IG). Per the Culver City Municipal Code, this designation is applied to areas appropriate for a wider variety of industrial uses than the Light Industrial (IL) District, including outdoor activities, but no heavy industry. The IG Zoning District is consistent with the Industrial land use designation of the General Plan.

#### Land Use Designation

##### Venice Community Plan

The Land Use designation for the Project Site and Laydown Areas 1 and 2 is Multiple Family Residential. This is defined as all multiple-family residential development of five or more units.

##### Culver City General Plan

Laydown Area 3 in Culver City has a land use designation of Industrial. The General Plan indicates that this designation is intended to strengthen and protect successful existing uses, while encouraging desirable and creative new development, including manufacturing and industrial, but excluding heavy industrial.

## Development Standards and/or Principles

The following identifies land use and development regulations applicable to the Project Site, based upon its current general plan land use designations and zoning within the applicable plans. This information is included here in order to determine later in the analysis if the Proposed Project would be consistent with these requirements and if not, what land use and zoning actions would be needed. It should be noted that the information below does not address development standards or principles associated with Laydown Areas 2 or 3 since these sites would only be used temporarily for construction activities and once the Proposed Project is constructed, returned to their original use and condition (currently vacant lots).

### Los Angeles Green Building Code

The Los Angeles Green Building Code (LAGBC) applies to the non-residential construction of all new buildings, all building alterations with a building permit valuation of over \$200,000, and all building additions. This includes construction, alteration, replacement, repair, use and occupancy, and demolition of all structures connected to applicable buildings. The Los Angeles Green Building Code requires mandatory design elements in Planning and Design, Energy Efficiency, Water Efficiency & Conservation, Material Conservation and Resource Efficiency, and Environmental Quality.

### Venice Community Plan

The following design guidelines are identified for land use designations and zoning for Multiple Family Residential.

**Site Planning** - All multiple-family residential development of five or more units should be designed to the extent feasible around a landscaped focal point or courtyard.

**Design** - The design of all buildings shall be of a quality and character that improves community appearances by avoiding excessive variety or monotonous repetition. This can be accomplished through:

- Requiring the use of articulations, recesses, surface perforations, and/or porticoes to break up long, flat building facades.
- Utilizing complementary building materials on building facades.
- Incorporating varying design to provide definition for each floor.
- Integrating building fixtures, awnings, or security gates, into the design of building(s).
- Screening of all roof top equipment and building appurtenances from view.
- Requiring decorative, masonry walls to enclose trash.

### Venice Coastal Zone Specific Plan

The Project Site is located in the Ballona Lagoon West Bank Sub-area of Venice north of Ironside Street, generally bounded by Driftwood Street on the north; Via Marina on the south; Ballona Lagoon on the east; and Strongs Drive, Canal Court, and Pacific Avenue on the west. The following are applicable Development Standards from the Venice Specific Plan.

**Height** - Within 60 feet of the mean high tide of the Ballona Lagoon or inland side of the Esplanade (City right-of-way), whichever is furthest from the water as determined by a licensed surveyor, Venice Coastal Development Projects shall not exceed a maximum height of 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet. No portion of any structure (including Roof Access Structures, roof deck railings, and Architectural Features) shall exceed the 30 foot height limit within 60 horizontal feet of the mean high tide line of Ballona Lagoon or the inland side of the Esplanade, whichever is furthest from the water.

**Lagoon Buffer/Setback/Yards** - Lots located north of Ironsides Street:

1. All Venice Coastal Development Projects shall be set back an average of 15 feet but not less than ten feet from the lot line nearest to the water.
2. An open, permeable yard with an area of at least 15 times the lot width and a minimum of 450 square feet shall be maintained between the property line that faces the water and the front of any structure. No building extensions, including stairs and balconies, shall be allowed in the required permeable yard area, except for ground level permeable decks that do not exceed 18 inches in height.
3. The combined height of any decks, railings, garden walls, and fences situated within the required permeable yard shall not exceed six feet above the elevation of the adjacent public walkway.
4. The sideyard shall be consistent with LAMC requirements, but shall not be less than 3 1/2 feet.

**Fill** - No Fill shall be permitted in the lagoon and buffer area, except for the minimum amount necessary for habitat restoration and public access.

**Drainage** - Prior to issuance of a building permit for a new Venice Coastal Development Project or an expansion of the existing building footprint by more than ten percent, the applicant shall submit drainage plans to the Department of Building and Safety for its approval. All drainage for new construction shall be directed away from Ballona Lagoon. The applicant and all successors in interest shall maintain the approved Venice Coastal Development Project consistent with the drainage plans approved by the Department of Building and Safety.

**Lot Consolidation** - Ballona Lagoon West residentially-zoned lots are allowed a maximum of two residentially-zoned lots to be consolidated provided the Venice Coastal Development Project conforms with the following applicable development standards:

- Buildings shall be designed with visual breaks or Architectural Features, including balconies or terraces, with a change of material or a break in the plane for every 20 feet in horizontal length and every 15 vertical feet. Residential buildings shall provide habitable space on the Ground Floor, a ground level entrance, and landscaping and windows fronting the street.
- For residential Venice Coastal Development Projects, front porches, bays and balconies shall be provided to maximize architectural variety.

### **Venice Specific Plan Findings of Consistency**

Venice Specific Plan Findings of Consistency are required to grant a Project Permit Compliance Review in the Venice Coastal Zone. The Approving Authority, the Director of Planning must make each of the Findings:

- That the Venice Coastal Development Project is compatible in scale and character with the existing neighborhood, and that the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood;
- That the Venice Coastal Development Project is in conformity with the certified Venice Local Coastal Program;
- That the applicant has guaranteed to keep the rent levels of any Replacement Affordable Unit at an affordable level for the life of the proposed Venice Coastal Development Project and to register the Replacement Affordable Units with the Los Angeles Department of Housing;
- That the Venice Coastal Development Project is consistent with the special requirements for low- and moderate-income housing units in the Venice Coastal Zone as mandated by California Government Code Section 65590 (Mello Act).

### **Venice Local Coastal Program Land Use Plan**

The Venice LCP-LUP notes the following for the Ballona Lagoon West Sub-area North of Ironside Street in which the Project Site is located:

**Height** - The maximum allowable building height for the Project Site is 30 feet within 60 horizontal feet of the mean high tide line of Ballona Lagoon, Grand Canal or the inland side of the Esplanade (City right-of-way), whichever is furthest from the water. Beyond 60 horizontal feet, one foot in additional height is permitted for each two additional horizontal feet to a maximum height of 38 feet. It also notes the following:

- All building heights shall be measured from the elevation of the fronting right-of-way, except on lagoon lots where all building heights shall be measured from the average existing natural grade.
- No portion of any structure (including roof access structures, roof deck railings and architectural features) shall exceed the 30-foot height limit within 60 horizontal feet of the mean high tide line of Ballona Lagoon, Grand Canal, or the inland side of the Esplanade (City right-of-way).
- Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts, and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.

**Lot Consolidation** - Concerning lot consolidation, the LCP notes that no more than two lots may be consolidated in the Ballona Lagoon West sub-area north of Ironsides Street in which the Project Site is located and provided that:

- No building or structure shall be constructed on what were more than two contiguous lots prior to lot consolidation with the exception of subterranean development that is entirely below street elevation.
- Building facades shall be varied and articulated to provide a pedestrian scale which results in consistency with neighboring structures on small lots. Such buildings shall provide habitable space on the ground floor, a ground level entrance and landscaping and windows fronting the street. No increase in the number of units shall result from the lot consolidation.
- Front porches, bays and balconies shall be provided to maximize architectural variety.

**Use** - Two units per lot including duplexes.

**Density** - One unit per 1,500 square feet of lot area.

**Esplanade** - The Esplanade (City right-of-way) shall be maintained and improved in order to provide for continuous public pedestrian access along Ballona Lagoon and the Grand Canal waterway.

**Grand Canal and Lagoon Buffer/Setback** - In order to provide a setback for public access, visual quality, and to protect the biological productivity of the canals, an average setback of 15 feet, but not less than 10 feet, shall be maintained in the front yard adjacent to the property line nearest the water.

**Yards** - Minimum side yard of 3 ½ feet. An open, permeable yard of at least 450 square feet for a 30-foot wide lot, and at least 600 square feet for a 40-foot wide lot, shall be maintained between the lagoon/canal property line and the front of any structure. A minimum 10-foot front yard setback, with a required 15-foot setback average, shall provide the required permeable front yard area. No building extensions, including stairs and balconies, shall be placed in or over the required permeable front yard area with the exception of permeable decks. The total combined height of any deck, deck railings, garden walls and/or fences situated within the required permeable front yard area shall not exceed 6 feet above the elevation of the adjacent public walkway.

### **3.8.2.2 Applicable Goals, Objectives, and Policies**

Table 3.8-2 contains applicable project-related goals, objective, and policies associated with plans and programs governing the Project Site.

**Table 3.8-2. Proposed Project Consistency with Applicable Plans and Goals, Objectives, and Policies**

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Venice Local Coastal Program</b>		
<b>Policy IA.1. Residential Development.</b>	<p>The maximum densities, building heights and bulks for residential development in the Venice Coastal Zone shall be defined by the Land Use Plan Maps and Height Exhibits (Exhibits 9 through 16), and the corresponding land use categories and the development standards as described in this LUP. Refer to Policies II.C.10 for development standards for walk streets and to Policies II.A.3 and 4 for parking requirements.</p> <p>b. Residential Lot Consolidations. In order to preserve the nature and character of existing residential neighborhoods, lot consolidations shall not be permitted in the Venice Canals and Silver Strand residential neighborhoods. No more than two lots may be consolidated in the Ballona Lagoon West, Ballona Lagoon (Venice Grand Canal) East, Southeast Venice, Milwood, North Venice and Oxford Triangle neighborhoods and on walk streets. Lot consolidations of not more than three lots shall be permitted in the Oakwood and Marina Peninsula residential neighborhoods. Lot consolidations may be permitted only subject to the following limitations:</p> <p>i. No building or structure shall be constructed on what were more than two contiguous lots prior to lot consolidation with the exception of subterranean development that is entirely below street elevation.</p> <p>ii. Building facades shall be varied and articulated to provide a pedestrian scale which results in consistency with neighboring structures on small lots. Such buildings shall provide habitable space on the ground floor, a ground level entrance and landscaping and windows fronting the street. No increase in the number of units shall result from the lot consolidation.</p> <p>iii. Front porches, bays and balconies shall be provided to maximize architectural variety.</p>	<p>No. The Proposed Project includes the consolidation of two lots, adjacent to the Venice Pumping Plant (VPP). The building's scale, massing, and design would complement the adjacent neighborhood's architecture and design. There would be no habitable space on the ground floor because the building would be used as an electrical and Control Room structure. A ground-level entrance and landscaping would be provided. Windows (including some faux windows) would be provided on both levels of the two-story building fronting the street and building's south side.</p>
<b>Policy IA.5. Preserve and Protect Stable Multi-Family Neighborhoods</b>	<p>Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained and improved.</p>	<p>No. The Proposed Project would be designed in a manner that preserves and protects the multi-family residential neighborhood by following the Residential Citywide Design Guidelines and providing a high-quality building and landscaping design that complements the massing, scale, and architecture of the neighborhood. Although the building would function as an electrical and Control Room for the VPP and Venice Auxiliary Pumping Plant (VAPP), its appearance would be</p>



Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
		residential in nature. In addition, the provision of Open Space along the eastern portion of the VAPP and at 128 Hurricane Street, would introduce new green space within this area of the Venice community and would contribute to the resident’s quality of life by providing passive recreation activities and unobstructed views of the Venice Grand Canal and Ballona Lagoon.
<p><b>Policy I.A.7. Multi-Family Residential – Low Medium II Density</b></p>	<p>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. The following is a summary of the Venice Specific Plan density and development standards for properties within the Ballona Lagoon West subarea North of Ironside Street:</p> <p><b>Use:</b> Two units per lot including duplexes</p> <p><b>Density:</b> One unit per 1,500 square feet of lot area</p> <p><b>Esplanade:</b> the Esplanade (City right-of-way) shall be maintained and improved in order to provide for the continuous public pedestrian access along Ballona Lagoon and the Venice Grand Canal waterway.</p> <p><b>Venice Grand Canal and Lagoon Buffer/Setback:</b> In order to provide a setback for public access, visual quality, and to protect the biological productivity of the canals, an average setback of 15 feet, but not less than 10 feet, shall be maintained in the front yard adjacent to the property line nearest the water.</p> <p><b>Yards:</b> Minimum side yard of 3 ½ feet. An open, permeable yard of at least 450 square feet for a 30-foot wide lot, and at least 600 square feet for a 40-foot wide lot, shall be maintained between the lagoon/canal property line and the front of any structure. A minimum 10-foot front yard setback, with a required 15-foot setback average, shall provide the required permeable front yard area. No building extensions, including stairs and balconies, shall be placed in or over the required permeable front yard area with the exception of permeable decks. The total combined height of any deck, deck railings, garden walls and/or fences situated within the required permeable front yard area shall not exceed 6 feet above the elevation of the adjacent public walkway.</p> <p><b>Height:</b> Not to exceed 30 feet within 60 horizontal feet of the mean high tide line of Ballona Lagoon, Venice Grand Canal or inland side of the Esplanade (City right-of-way), whichever is furthest from the water. Beyond 60 horizontal feet, one foot in additional height is permitted for each two additional horizontal feet to a maximum height of 38 feet. No portion of any structure (including roof access structures, roof deck</p>	<p>No. Although the Proposed Project is designated as RW2-1 (Residential Water Ways Zone) and the City of Los Angeles General Plan as Residential/Medium Residential, the proposed use (Public Facility) qualifies as a Public Benefits Project, per Article 4, Section 14.00 of the Los Angeles Municipal Code (LAMC). The LABOE will comply with the design criteria and development standards of Venice Specific Plan and the Residential Citywide Design Guidelines. The Open Space proposed along the east side of the VAPP would meet the front yard requirement along the Venice Grand Canal. The Proposed Project can meet the permeable Open Space requirement through a LAMC RW2-1 Zone Adjustment for Yards. This is needed to comply with rear yard setback requirements due to the facility’s design which would include transformers that encroach into the rear yard more than the maximum 6 feet permitted. Similarly, there are Los Angeles Department of Water and Power (LADWP) facilities proposed to be located along Canal Court, which may not be able to meet local fencing requirements, due LADWP transformer design specifications. The building height (32 feet) would comply with building requirements. During construction of the Coastal Interceptor Sewer (CIS) diversion structure in the Venice Grand Canal, some fill derived from the canal would need to be stockpiled and then backfilled to cover the structure and to re-contour the western bank of the canal, which is proposed to be re-vegetated with native plants.</p>

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
	<p>railings and architectural features) shall exceed the 30-foot height limit within 60 horizontal feet of the mean high tide line of Ballona Lagoon, Venice Grand Canal or inland side of the Esplanade (City right-of-way), whichever is furthest from the water. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.</p> <p><b>Fill:</b> No fill shall be permitted in the lagoon. No fill may be placed in the lagoon buffer except for the minimum amount necessary for habitat restoration and public access.</p>	
<p><b>Policy I.D.1. Canals and Ballona Lagoon Waterways.</b></p>	<p>The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Venice Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the “Open Space” designation.</p> <p>Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.</p>	<p>No. The Proposed Project entails development of a Public Facility on two lots designated in the General Plan as Medium Residential. As noted above, the Proposed Project qualifies as a Public Benefits Project, per the LAMC and therefore, would be considered a permitted use, if approved. The Proposed Project also includes restoration of a portion of the western bank of the Venice Grand Canal associated with installation of the CIS diversion structure. A Open Space along the eastern side of the Proposed Project adjacent to the Venice Grand Canal would provide both a buffer and serve as water quality treatment feature to capture and treat runoff from the site. As noted above, the site also includes drainage and water quality features designed to capture, contain, and treat stormwater runoff, consistent with applicable plans and policies.</p>
<p><b>Policy I.D.3. Views of Natural and Coastal Recreation Resources.</b></p>	<p>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</p> <p>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.</p>	<p>No. As noted above, the Proposed Project qualifies as a Public Benefits Project and has been designed consistent with Venice the Residential Citywide Design Guidelines, and with design standards contained within the Venice Specific Plan. The building’s massing, scale, design, and height would complement the adjacent residential neighborhood.</p>
<p><b>Policy V.A.1. General</b></p>	<p>Public services shall consider the competing needs of residents and visitors for use of roadways, existing parking, service systems, domestic water, public restrooms, etc., and shall allocate resources to expand the</p>	<p>No. The Proposed Project entails the construction of a critical facility necessary for the safe operation of the CIS and VPP and in order to reduce the potential for a catastrophic sewage spill into the Venice</p>

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
	<p>use of these existing facilities and create new facilities where necessary in a manner that they do not adversely affect residents. Public works projects shall be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the coastal development permit process as required by the Coastal Act.</p>	<p>Grand Canal, Ballona Lagoon, or adjacent street network. The Proposed Project would be constructed on three vacant lots owned by the City. Two of the lots would be consolidated and one is proposed for Open Space and parking for use by the adjacent residents. The analysis contained in the Draft Environmental Impact Report (EIR) determined that all impacts would be less than significant, except short-term noise and vibration and Greenhouse Gases. In addition, the Proposed Project would be required to obtain a Coastal Development Permit.</p>
<p><b>Policy V.A.3. Infrastructure</b></p>	<p>New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible. The City of Los Angeles Department of Public Works shall develop a comprehensive citywide Storm Water Management Program, as discussed further in Implementation Strategy of Policy IV.C.1 of this LUP, to control stormwater run-off from new public and private developments and, where feasible, to remove pollutants from that run-off. Development of infrastructure shall precede or be constructed concurrently with the construction of developments or in lieu-fee should be paid.</p>	<p>No. The Proposed Project entails the construction of a critical facility necessary for the safe operation of the CIS and VPP and in order to reduce the potential for a catastrophic sewage spill into the Venice Grand Canal, Ballona Lagoon, or adjacent street network. The Proposed Project is part of a comprehensive Los Angeles Bureau of Sanitation (LABOS) and LABOE effort to upgrade and enhance critical sewage conveyance and pumping facilities throughout the city of Los Angeles in order to provide required redundancy and enhance safety.</p>
<p><b>Policy I.E.2. Scale.</b></p>	<p>New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.</p>	<p>No. As noted above, the Proposed Project qualifies as a Public Benefits Project, and has been designed consistent with the Residential Citywide Design Guidelines and the Venice Specific Plan. A high-quality design is proposed for the electrical building and would complement the scale, massing, design, and architecture of the adjacent residential neighborhood. A lot consolidation is proposed for the two contiguous lots adjacent to the existing VPP. The height of the electrical building would be 32 feet, which although above the 30-foot maximum includes roof access structures, etc. Exhaust ducts and other ancillary facilities associated with the building, except the heating and cooling mechanism (proposed to be constructed outside and at grade), would be contained within the building.</p>

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Policy I.E.3. Architecture</b>	Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.	No. The proposed design of the electrical building would be developed to complement the scale, massing, design, and architecture of the adjacent residential neighborhood.
<b>Policy I.F.3. Venice Canals</b>	The historic integrity of the Venice Canals shall be preserved. The canals are deemed to be significant as an early example of community recreational planning in a coastal marshlands area. Included in the historic district are the six canals, their associated sidewalks and a number of pedestrian and vehicular bridges. The Venice Canals are listed on the National Register of Historic Places as an historic district (August 30, 1982). Additionally, the City of Los Angeles Cultural Heritage Commission declared the Venice Canal System a Los Angeles City Historic-Cultural Monument (HCM No. 270, August 2, 1983).	No. The Proposed Project would preserve the historical integrity of the Venice Canals, including the Venice Grand Canal and Ballona Lagoon. During project construction, temporary work within the Venice Grand Canal would be required to construct the CIS diversion structure. Subsequent to construction, this portion of the western bank of the canal would be restored with native plant communities. No impacts are anticipated to the Grand Canal or Ballona Lagoon. The Office of Historic Preservation would be consulted to ensure that the Proposed Project is compatible with the Venice Canals. Additionally, the Proposed Project would undergo design review by the City's Case Management Division and the Department of City Planning's Urban Design Studio in order to ensure that it is compatible with and does not adversely affect the Grand Canal and Ballona Lagoon.
<b>Policy I.F.6. Archaeological Resources</b>	Significant archaeological resources shall be protected from permanent loss. A preliminary cultural resources record search to determine the existence of significant archeological sites shall be required for developments which require more than minimal grading. Mitigation plans for the protection of such resources shall be required. If, during construction, any archaeological resources are discovered, work shall be stopped to prevent further disturbance of the resources, and the proper authorities shall be immediately notified.	No. The analysis contained in the Draft EIR indicates that impacts to Cultural Resources would be less than significant and no mitigation measures are required. Standard regulatory requirements would require the cessation of construction activities in the event Cultural Resources are discovered.
<b>Policy II.A.3. Parking Requirements.</b>	Public Utility Facility not having a Business Office on the premises: 2 spaces; plus 1 space for each 500 square feet of floor area. Parking shall be provided pursuant to a detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities.	No. The Proposed Project includes a total of eight parking spaces, five for on-site parking and three relocated off-site parking spaces. The Proposed Project requires a total of five on-site parking spaces. A total of four spaces are required to comply with the Venice Specific Plan and one parking space is required to comply with Beach Impact Zone Parking requirements. These spaces are allowed off-site, located within 750 feet of the property per LAMC 12.21 A.4 (g) and would be located on 128 Hurricane Street with a recorded covenant. Since the proposed parking area is R-zoned, a Conditional Use for Parking (LAMC 12.24) would be required to allow a parking lot on the R-zoned lot. Also since the parking would be removed and replaced with a red curb and/or a driveway along the southerly boundary of the Proposed Project along Hurricane Street, three spaces would be relocated on the 128 Hurricane Street lot. It should be noted that the Draft EIR

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
		determined that impacts associated with parking during operation of the Proposed Project would be less than significant and therefore, no mitigation measures are required.
<p><b>Policy II.A.4. Parking Requirements in the Beach Impact Zone</b></p>	<p>Any new and/or any addition to commercial, industrial, and multiple-family residential development projects within the Beach Impact Zone shall provide additional (in addition to parking required by Policy II.A.3) parking spaces for public use or pay in-lieu fees into the Venice Coastal Parking Impact Trust Fund.</p> <p>Beach Impact Zone (BIZ) Parking Impact Trust Fund criteria:</p> <p>a. Commercial and industrial projects in the BIZ shall provide one additional parking space for each 640 square feet of floor area of the ground floor. Up to 50% of the total number of these additional parking spaces required in this section may be paid for in lieu of providing the spaces.</p> <p>c. All in-lieu fees shall be paid into the Venice Coastal Parking Impact Trust Fund to be administered by the City of Los Angeles Department of Transportation for improvement and development of public parking facilities that support public access to the Venice Coastal Zone.</p> <p>d. In no event shall the number of BIZ parking spaces (over and above those spaces required by the parking requirements set forth in Policy II.A.3) required for projects of three or more dwelling units, or commercial or industrial projects, be less than one (1) parking space for residential projects and two (2) parking spaces for commercial and industrial projects.</p>	No. See response immediately above.
<p><b>Policy II.A.9. Protection of Public Parking</b></p>	<p>The following policies shall be implemented and enforced in order to protect and enhance public parking opportunities provided on public rights-of-way and in off-street parking areas.</p> <p>b. Street Ends. It is the policy of the City to not permit privatization of street ends. Public parking opportunities shall be protected and encouraged at improved and unimproved street-ends that abut Ocean Front Walk and/or the beach.</p> <p>c. Rights-of-Way. In order to maintain and increase the public parking supply, the City shall maximize and protect the availability of public parking opportunities on city streets that currently accommodate vehicular traffic.</p>	No. See response immediately above.

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<b>Policy II.C.1. General Non-Vehicular Coastal Access Policy</b>	Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.	No. The Proposed Project would introduce a new public Coastal Access point at 128 Hurricane Street that includes walking trails that lead to the coastal waterway. Public access to the coast and coastal waterways would not be removed as a result of the Proposed Project. The Esplanade walking trail adjacent to the Project Site would be maintained and protected consistent with the CA Coastal Act.
<b>Policy II.C.2. Venice Grand Canal Pedestrian Access.</b>	The three existing public rights-of-way from the Venice Grand Canal to Strongs Drive and Pacific Avenue shall be improved and appropriately signed. South of Washington Boulevard, the public walkways that provide public pedestrian access along both sides of Venice Grand Canal shall be improved and appropriately signed.	No. With the exception of temporary closure of the Esplanade between the northern project boundary and eastern terminus of Hurricane Street during construction of the CIS diversion structure within the Grand Canal, access to this portion of the canal would not be inhibited. It should be noted that Open Space located along the eastern portion of the VAPP site is proposed and would provide pedestrians with additional access and viewing point of the Venice Grand Canal. Signage indicating the Open Space is accessible to the public would be included.
<b>Policy II.C.3. Ballona Lagoon Enhancement Plan (Pedestrian Access).</b>	Pedestrian access and interpretative overlooks to the Ballona Lagoon shall be enhanced without invading the privacy of adjoining residents. The existing public walkway on the east bank of Ballona Lagoon, and the overlook on the southern end of the lagoon near Via Marina, shall be maintained and protected for public access. (Refer also to Policy IV.B.1).	No. Both of the Open Space proposed along the eastern boundary of the VAPP, fronting the Grand Canal and the vacant lot located at 128 Hurricane Street, which faces the Ballona Lagoon, would be accessible to the public.
<b>Policy II.C.11. Encroachment into Walk Street Right-of-Way</b>	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 path ways 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.	No. The Proposed Project does not include encroachment into the City right-of-way. The Open Space provided along the eastern boundary of the VAPP would serve as a buffer between the facility and the Grand Canal. Landscaping within this area would be limited to native species, turf or other permitted groundcovers or landscaping materials. The provision of this space would also be consistent with the hydrology and water quality design intended to capture, retain, and treat stormwater runoff originating from the Project Site. Portions of the surface areas of the VAPP would utilize decomposed granite, which would serve as a permeable paving material. Fencing materials used would follow City requirements, except the location in which LADWP facilities are proposed (along Canal Court) since these require certain design standards intended to protect the public and these facilities from vehicle damage.

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Policy III.A.1. General</b>	<p>New recreational opportunities should be provided, and existing recreational areas, shown on Exhibits 19a through 21b, shall be protected, maintained and enhanced for a variety of recreational opportunities for both residents and visitors, including passive recreational and educational activities, as well as active recreational uses.</p> <p>a. Recreation and visitor-serving facilities shall be encouraged, provided they retain the existing character and housing opportunities of the area, and provided there is sufficient infrastructure capacity to service such facilities.</p> <p>b. Acquisition, expansion and improvement of parks and facilities throughout the Venice Coastal Zone shall be encouraged and accelerated, subject to the availability of funds.</p> <p>c. Where feasible and compatible with the surrounding neighborhood, recreational uses shall be located in conjunction with other new public facilities, such as public parking lots.</p>	<p>No. As noted above, Open Space is proposed and would include the eastern boundary of the VAPP adjacent to the Grand Canal and a vacant lot located at 128 Hurricane Street and fronting Ballona Lagoon. These two areas would provide passive recreation opportunities for area residents and visitors. The facilities would be maintained by the LABOS. Limited parking for non-motorized vehicles (e.g., bicycles) is proposed for 128 Hurricane Street, although the exact number of spaces has not been determined.</p>
<b>Policy III.D.1. General</b>	<p>Existing bodies of water, including the Venice Canals, Venice Grand Canal south of Washington Boulevard, Ballona Lagoon, and the Pacific Ocean and beaches, shall remain open to the public for recreational uses, as specified in this LUP.</p>	<p>No. The Proposed Project would not inhibit public use of the Grand Canal, the Ballona Lagoon, or the Pacific Ocean.</p>
<b>Policy III.D.5. Educational and Passive Recreational Use of Waterways</b>	<p>Educational use of coastal waterways by schools and other groups shall be encouraged. Passive educational and recreational opportunities shall be maintained and enhanced via a public walkway along the Venice Grand Canal and lagoon wetlands. The City shall establish observation areas with seating and shade, subject to the availability of sufficient space and funding, to provide opportunities for passive recreation in the lagoon and canals in such a manner as to provide public access, consider the privacy of adjacent residences, and to protect public views.</p>	<p>No. As noted above the two Open Space areas located along the eastern boundary of the VAPP and on the vacant lot located at 128 Hurricane Street would provide passive recreation and viewing areas of the Grand Canal and the Ballona Lagoon. The design of these spaces would also consider the privacy of adjacent residences and would provide expansive public views of the scenic resources.</p>
<b>Policy III.D.6. Venice Canals Parks</b>	<p>New parks, with parking to the rear, shall be considered on some of the City-owned lots on the canals, provided that such facilities are compatible with the existing residential use of the area.</p>	<p>No. See response immediately above. It should be noted that the Open Space proposed along the eastern boundary of the VAPP does not include sufficient space for parking. The vacant lot located at 128 Hurricane Street would provide an alternative location for parking spaces that would be removed along Hurricane Street.</p>

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<b>Policy IV.A.2. Permitted Uses</b>	Uses permitted in or adjacent to the canals shall be implemented in a manner to protect the biological productivity of marine resources and maintain healthy populations of marine organisms. Such uses as open space, habitat management, controlled nature study and interpretation, and passive public recreation use of walkways for birdwatching, photography, and strolling shall be encouraged and promoted.	No. The analysis contained in the Draft EIR determined that both construction and operational-related impacts to biological resources, with the incorporation of mitigation, would be less than significant. Pending construction of the CIS diversion structure, a portion of the western bank of the Grand Canal would be restored with native plant communities, which would result in direct benefits to local wildlife. The provision of two Open Space areas located along the eastern boundary of the VAPP, fronting the Grand Canal, and the vacant lot located at 128 Hurricane Street, fronting Ballona Lagoon, would provide passive recreation, birdwatching, photography, and strolling opportunities.
<b>Policy IV.A.3. Venice Canals Landscape Buffer.</b>	To protect the marine habitat, a one and one-half to two-foot-wide safety landscape buffer strip shall continue to be provided and maintained between the canal banks and sidewalks. Landscaping in the buffer strip shall consist of native coastal strand marshland or wetland vegetation as specified in the Venice Canals Rehabilitation Plan approved by Coastal Commission Coastal Development Permit 5-91-584.	No. Pending construction of the CIS diversion structure, a portion of the western bank of the Venice Grand Canal would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584. The restored area would extend from the northern boundary of the VAPP to the eastern terminus of Hurricane Street.
<b>Policy IV.A.4. Venice Canals Setback and Yard Area</b>	In order to provide a setback for access, to protect visual quality and the biological productivity of the canals, and to limit water runoff, a setback with an average depth of 15 feet (and a minimum depth at any point of 10 feet) shall be provided and maintained in the front yard areas of private residences (adjacent to the canal property line). This setback shall provide a permeable yard with an area at least 15 feet times the width of the lot line at the canal side. (See also Policy I.A.4a for details).	No. The Proposed Project must comply with the Venice Specific Plan Setbacks and Yard requirements. The Proposed Project can meet the permeable Open Space requirement but would need a RW2-1 zone Adjustment for Yards to comply with rear yard setback requirements due to the facility's design, which would include transformers taller than the maximum 6 feet that encroach into the rear yard. The LABOE however, proposes to provide an Open Space buffer approximately 15 feet in width between the Esplanade and VPP. This area would be serve a dual use purpose including Open Space for passive recreation and viewing of the Grand Canal and to capture, retain, and treat stormwater runoff originating from the VAPP. As noted above, pending construction of the CIS diversion structure, a portion of the western bank of the Venice Grand Canal would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584. The restored area would extend from the northern boundary of the VAPP to the eastern terminus of Hurricane Street.



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<b>Policy IV.B.1. Ballona Lagoon</b>	b. Permitted Uses. Only uses compatible with preservation of this habitat shall be permitted in and adjacent to the lagoon. Uses permitted in or adjacent to the lagoon shall be carried out in a manner to protect the biological productivity of marine resources and maintain healthy populations of marine organisms. Such uses as open space, habitat management, controlled nature study and interpretation, and passive public recreation such as birdwatching, photography, and strolling shall be encouraged and promoted. No fill shall occur in Ballona Lagoon unless it is consistent with Coastal Act Section 30233 and is the least environmentally damaging alternative. No untreated runoff shall be directed into the lagoon.	No. The Open Space proposed at the vacant lot at 128 Hurricane Street would be used for passive recreation uses. It would also provide opportunities for birdwatching, photography, and strolling along the Esplanade. As noted in the analysis contained in the Draft EIR, implementation of the Proposed Project would result in less-than-significant impacts to biological resources during construction and operation, with the inclusion of mitigation measures. In addition, all runoff would be captured, retained, and treated on-site and would not be allowed to enter the Ballona Lagoon. Similarly, no fill is proposed within the lagoon.
<b>Policy IV.B.3. Ballona Lagoon Development Standards.</b>	The setbacks and height of buildings adjacent to the lagoon shall continue to be limited as provided in Policies I.A.4b, c, and d so that development is compatible with the continuance of the environmentally sensitive habitat.	No. The Proposed Project does not include the development of buildings adjacent to the Ballona Lagoon, only passive Open Space uses, which are compatible with the Environmentally Sensitive Habitat. Moreover as noted in the analysis contained in the Draft EIR, implementation of the Proposed Project would result in less-than-significant impacts to biological resources during construction and operation, with the inclusion of mitigation measures.
<b>Policy IV.B.4. Lagoon and Venice Grand Canal Zoning.</b>	The lots beneath the waterways of the Ballona Lagoon and Venice Grand Canal south of Washington Boulevard shall be rezoned as Open Space (OS). This zone protects recreational and scenic uses of the coastal area while providing for other uses which would benefit the public without significant impairment of the recreational and residential uses.	No. The Proposed Project does not propose any changes to the OS zone of the Grand Canal and therefore would not be incompatible with it, as indicated in the analysis contained in the Draft EIR. Moreover, the construction of the CIS diversion structure within the Grand Canal would be temporary and would not protrude above the bottom of the canal and into the water column and would not be visible to area residents or visitors, thereby protecting scenic views.
<b>Policy IV.B.7. Venice Grand Canal Rehabilitation.</b>	The Venice Grand Canal between Hurricane Street and Washington Boulevard shall be restored and maintained in order to improve water quality, aquatic habitat, and public pedestrian access along the waterway in a manner that is sensitive to the privacy of adjoining residents.	No. As noted above, pending construction of the CIS diversion structure, a portion of the western bank of the Venice Grand Canal, between the northern property boundary of the VAPP north to Washington Blvd., would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584.
<b>Policy IV.C.1. Stormwater Runoff</b>	All new public and private development, substantial rehabilitation, redevelopment or related activity, which discharges stormwater runoff into the Ocean, Ballona Lagoon, Venice Grand Canal south of Washington Boulevard or the Venice Canals shall be designed and conducted in compliance with the County-wide Municipal National Pollution Discharge Elimination System (NPDES) Stormwater Permit, issued by the California Regional Water Quality Control Board (RWQCB), the RWQCB approved Standard Urban Stormwater Mitigation Plan, and the NPDES General	No. The Proposed Project includes the provision of required Best Management Practices (BMPs) and low impact development (LID) features to address on-site hydrology and water quality conditions and potential impacts. The Project Site (including Open Space areas) would be designed to convey, capture, and treat stormwater runoff originating from these sites and to ensure that it does not enter off-site areas, including the Grand Canal or Ballona Lagoon. Stormwater would not drain into any adjacent waterways, it would be self-contained on

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	<p>Permit for Stormwater Discharges Associated with Construction Activity, issued by the State Water Resources Control Board (SWRCB), where applicable. Methods to improve water quality, such as the mitigation of the first-flush stormwater runoff entering coastal waterways, shall be imposed as conditions of development by the City of Los Angeles in accordance with SWRCB and RWQCB recommendations and regulations, and the Santa Monica Bay Restoration Project Action Plan in order to protect, restore, and where feasible, enhance the water quality and habitat of these waterways.</p>	<p>the Project Site. It should also be noted that the analysis contained in the Draft EIR determined that impacts related to hydrology and water quality would be less than significant with the implementation of mitigation measures.</p>
<p><b>Policy IV.C.2. Water Quality</b></p>	<p>Prior to issuance of building permits for all developments adjacent to the canals area, Venice Grand Canal and Ballona Lagoon, a grading and drainage plan indicating that low flow surface runoff is prevented from traveling directly from the lot into the coastal waterways by one or more of the following methods are recommended: Installation of green strip filters or equivalent pollution-reducing devices in all new private and public parking areas adjacent to the canals and lagoon; upgrading of existing illicit storm drain connections with French drains; surface runoff directed to an existing storm drain; lot sloped to drain toward the alley; and, front yards adjacent to the canals and lagoon shall be required to have a permeable surface, or where the surface is not permeable, provide a drainage system to prevent runoff directly into the lagoon or canals. An engineering and soils report to determine suitability of soils for french drains may be required.</p>	<p>No. See response directly above. In addition, runoff capture features are proposed on-site and a bioswale (Open Space area) is proposed along the eastern boundary of the VAPP adjacent to the Venice Grand Canal, which would prevent runoff from entering this waterbody. In addition, the green space proposed at 128 Hurricane Street would be developed to include similar stormwater runoff capture and treatment features to ensure that these flows do not enter Ballona Lagoon.</p>
<p><b>Policy IV.D.1. Venice Canals Habitat</b></p>	<p>The Venice Canals have been identified by the Least Tern Recovery Team as a foraging habitat for the Least Tern. Development within or adjacent to the canals that might affect this foraging habitat shall not be permitted.</p>	<p>No. As noted in the analysis contained in the Draft EIR, implementation of the Proposed Project would result in less-than-significant impacts to biological resources (including Least Tern) during construction and operation, with the inclusion of mitigation measures.</p>
<p><b>Policy IV.D.2. Ballona Lagoon Habitat</b></p>	<p>The Ballona Lagoon has been identified by the Least Tern Recovery Team as a critical habitat for the Least Tern for feeding. Development within or adjacent to the lagoon that might adversely impact the quality of this foraging habitat shall not be permitted.</p>	<p>No. See response directly above.</p>
<p><b>Policy IV.E.1. Maintenance</b></p>	<p>The banks, waterways and public walkways of the Venice Canals, Ballona Lagoon and Venice Grand Canal south of Washington Boulevard shall be periodically maintained by the City or other appropriate entity, to keep these areas free of accumulated trash and wastes, thereby maintaining the biological, water quality, recreational and aesthetic resources of these areas.</p>	<p>No. Both construction and operational-related waste would be disposed of properly within the VAPP. In addition, pending completion of the CIS diversion structure within the Venice Grand Canal, the western bank of the canal would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584. This is anticipated to have a beneficial impact on local wildlife by providing additional foraging habitat.</p>

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<b>Policy IV.F.1</b>	Diking, dredging and fill shall be permitted only in conjunction with an approved restoration plan and maintenance activity consistent with Coastal Act Section 30233. No construction shall be permitted on sandy beaches, except for construction in conjunction with approved recreational, ecological, and erosion control facilities. No fill shall be permitted in coastal waterways or below the seven foot contour for structures adjacent to the lagoon unless it is consistent with Coastal Act Section 30233 and is the least environmentally damaging alternative.	No. Construction of the CIS diversion structure would be required within the Grand Canal and would be accomplished via a temporary coffer dam. Once completed, the diversion structure would be located underground and beneath the canal and would not protrude into the water column. Dredged material would be collected and stored within one of the Laydown areas or at a landfill. A portion of the fill material would be returned to the site and used to cover the diversion structure located in the canal and to re-contour the western bank of the canal in the area used to access it, from the northern boundary of the VAPP to the eastern terminus of Hurricane Street. Once the diversion structure is completed, the western bank of the canal would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584.
<b>Policy IV.G.1. Flood Setback</b>	Potential flood hazard to residents along the west bank of the Ballona Lagoon and the east bank of the Venice Grand Canal shall be alleviated by increasing the development setback in the Silver Strand area and along the banks of the Venice Grand Canal and Ballona Lagoon (see Policies I.A.4 and 7), and by controlling erosion along the banks by the use of native flora.	No. As noted above, a portion of the western bank of the Venice Grand Canal would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584, which would assist in reducing erosion. In addition, the analysis contained in the Draft EIR determined that impacts associated with erosion would be less than significant with adherence to standard regulatory compliance measures and the implementation of mitigation measures.
<b>Policy IV.G.2. Hazard Mitigation for New Construction.</b>	Special development standards shall be developed for those areas within the Venice Coastal Zone which present potential flood and liquefaction hazards.	No. The analysis contained in the Draft EIR determined that no flooding would result during either construction or operation of the Proposed Project and that impacts associated with liquefaction hazards would be less than significant with the implementation of mitigation measures.
<b>Policy V.A.4. Conservation Programs.</b>	Conservation programs for public works services within the Venice coastal zone shall be encouraged and developed.	No. The restoration of a portion of the western bank of the Venice Grand Canal would assist the City in accomplishing this policy objective by replanting this area with native coastal plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584, which would assist in reducing erosion and enhancement of native habitat.

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<b>General Plan Framework</b>		
<b>Infrastructure and Public Services – Wastewater Collection</b>		
<b>Goal 9A</b>	Adequate wastewater collection and treatment capacity for the city and in basins tributary to City-owned wastewater treatment facilities.	No. The Proposed Project is intended to provide additional reliability and redundancy to the VPP. It would allow regular service and maintenance to occur without jeopardizing human and environmental health as a result of sewage spills from the VPP into the adjacent Grand Canal, Ballona Lagoon, or adjacent street network. The facility would also be planned and designed to consider future risks associated with global climate change, including sea-level rise, which could affect operation of the existing VPP.
<b>Objective 9.2</b>	Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.	No. See response immediately above. It should be noted that the analysis contained in the Draft EIR determined that the Proposed Project would not induce growth and does not include land uses that are growth-inducing by nature, such as residential, commercial, and industrial.
<b>Policy 9.2.4</b>	Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.	No. See response immediately above.
<b>Safety Element</b>		
<b>Goal 1</b>	A city where potential injury, loss of life, property damage and disruption of the social and economic life of the city due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.	No. The Proposed Project is intended to provide additional reliability and redundancy to the VPP. It would allow regular service and maintenance to occur without jeopardizing human and environmental health as a result of sewage spills from the VPP into the adjacent Grand Canal, Ballona Lagoon, or adjacent street network. The facility would also be planned and designed to consider future risks associated with global climate change, including sea-level rise, which could affect operation of the existing VPP.
<b>Policy 1.1.2</b>	Disruption reduction. Reduce, to the greatest extent feasible and within the resources available, potential critical facility, governmental functions, infrastructure and information resource disruption due to natural disaster. [All EOO programs involving mitigation of disruption of essential infrastructure, services and governmental operations systems and prepare personnel for quickly reestablishing damaged systems implement this policy.]	No. As noted above, the VPP is a critical City facility and currently has no mechanism to by-pass sewage flows from the CIS and therefore, must remain operational continuously. In the event of a natural disaster, the provision of additional pumps and associated redundancy would likely allow the facility to operate, thereby reducing the potential for catastrophic system failure and emergency discharges of sewage to the Grand Canal, Ballona Lagoon, or adjacent street network.

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<b>Policy 1.1.3</b>	Facility/systems maintenance. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions. [All EOO programs that involve provision of back up systems and procedures for reestablishment of essential infrastructure, services and governmental operations which are disrupted implement this policy.]	No. The Proposed Project is intended to provide additional reliability and redundancy to the VPP. It would allow regular service and maintenance to occur without jeopardizing human and environmental health as a result of sewage spills from the VPP into the adjacent Grand Canal, Ballona Lagoon, or adjacent street network. The facility would also be planned and designed to consider future risks associated with global climate change, including sea-level rise, which could affect operation of the existing VPP.
<b>Policy 1.1.4</b>	Health/environmental protection. Protect the public and workers from the release of hazardous materials and protect city water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation. [All EOO hazardous materials hazard and water pollution mitigation programs implement this policy.]	No. See response immediately above.
<b>Conservation Element</b>		
<b>Objective:</b>	Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.	No. The Venice Canal System is identified as City of Los Angeles Historic Cultural Monument No. 270 and is part of the Venice Historic Canal District (ZI-2370). The Grand Canal and Ballona Lagoon are located immediately adjacent to the Proposed Project. The analysis contained in the Draft EIR determined that no impacts to cultural resources, related to the Grand Canal or Ballona Lagoon would result with implementation of the Proposed Project. It should be noted however, that the City's Case Management Division and Urban Design Studio would assist with the design review of the Proposed Project. Additionally, the Office of Historic Preservation would be consulted to ensure that it is compatible with and does not adversely affect these Historic Resources.
<b>Policy:</b>	Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.	No. See response immediately above.

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<b>Open Space Element</b>		
<b>Goal:</b>	To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public.	No. See response immediately above. As noted above, the Proposed Project would include the provision of two Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas are required by the Venice Specific Plan and would provide passive recreation areas to adjacent residents and visitors and would directly benefit the public.
	To conserve and/or preserve those open space areas containing the city's environmental resources, including air and water.	No. See response immediately above.
<b>Objective:</b>	To emphasize the importance of, and to preserve open space and natural features in private and public development.	No. See response immediately above.
<b>Policies:</b>	Ecologically important areas are generally considered open space and shall be so designated. The following shall apply: (a) to the extent feasible, ecologically important areas should be kept in a natural state; (b) in the event a project is proposed within an ecologically important area, an environmental impact report shall be prepared	No. The Proposed Project is not located within an Environmentally Sensitive Habitat Area, but is located immediately adjacent to one (i.e., Grand Canal and Ballona Lagoon). Per the requirements of the California Environmental Quality Act (CEQA), an EIR has been prepared for the Proposed Project. As noted above, the analysis contained in the Draft EIR determined that impacts to biological resources, including Environmentally Sensitive Habitat Areas, would be less than significant during both construction and operation, with the implementation of mitigation measures.
	Small parks, public and private, should be located throughout the city. Not only should recreation activities be provided, but an emphasis shall be placed on greenery and openness.	No. As noted above, the Proposed Project would include the provision of two green Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas are required by the Venice Specific Plan would provide passive recreation areas to adjacent residents and visitors and would directly benefit the public.
	Where development is allowed in ecologically important areas, the intensity of development should be kept at a minimum consistent with reasonable use of the land. All measures should be taken to protect these areas including buffering ecologically important areas from conflicting or detrimental uses.	No. The Proposed Project is not located within an Environmentally Sensitive Habitat Area but is located immediately adjacent to the Venice Grand Canal and Ballona Lagoon. As noted above, the analysis contained in the Draft EIR determined that impacts to biological resources, including Environmentally Sensitive Habitat Area, would be less than significant during both construction and operation, with the implementation of mitigation measures.

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<b>Mobility Element</b>		
<b>Objective:</b>	Reduce the pollutant load of stormwater runoff to meet Total Maximum Daily Load standards.	No. The Proposed Project includes the provision of required BMPs and LID features to address on-site hydrology and water quality conditions and potential impacts. The Project Site (including Open Space areas) would be designed to convey, capture, and treat stormwater runoff originating from these sites and to ensure that it does not enter off-site areas, including the Grand Canal or Ballona Lagoon. It should also be noted that the analysis contained in the Draft EIR determined that impacts related to hydrology and water quality would be less than significant with the implementation of mitigation measures.
<b>Policy 2.3 Pedestrian Infrastructure:</b>	Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	No. During construction of the CIS diversion structure within the Grand Canal, a portion of Esplanade, extending from the northern boundary of the VAPP to the eastern terminus of Hurricane Street, would be closed temporarily to the public, although adequate existing alternative access is available along Canal Court between Esplanade and Galleon Street.
<b>Policy 5.5 Green Streets:</b>	Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	No. The Proposed Project includes the provision of required BMPs and LID features to address on-site hydrology and water quality conditions and potential impacts. The Project Site, especially the Open Space areas, would be designed to convey, capture, and treat stormwater runoff originating from these sites and to ensure that it does not enter off-site areas, including the Grand Canal or Ballona Lagoon. It should also be noted that the analysis contained in the Draft EIR determined that impacts related to hydrology and water quality would be less than significant with the implementation of mitigation measures.
<b>Health Element</b>		
<b>Policy 2.2 Healthy Building Design and construction:</b>	Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.	No. The Proposed Project would include the construction of a high-quality building design that is attractive and complements the scale, massing, character, and architecture of the adjacent residential neighborhood. The building would be required to adhere with applicable building design standards, including the Venice Specific Plan and the Residential Citywide Design Guidelines, and LID design features would be also be required.
<b>Policy 2.10 Social Connectedness:</b>	Acknowledge the mental and physical health benefits of social connectedness by promoting and valuing public spaces, social interaction, relationship building, and resilience in community and urban design.	No. As noted above, the Proposed Project would include the provision of two Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas would provide passive recreation areas for adjacent residents and visitors and would encourage social interaction and connectedness by providing a communal gathering space.

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<b>Objective:</b>	Increase the number of neighborhood and community parks so that every Community Plan Area strives for 3 acres of neighborhood and community park space per 1000 residents (excluding regional parks and open spaces)	No. The Proposed Project would add additional Open Space to the community. As noted above, the Proposed Project would include the provision of two Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas would provide passive recreation areas for adjacent residents and visitors. The provision of these spaces would assist the community in achieving its Community Plan Area goals.
<b>Objective:</b>	Increase access to parks so that 75% of all residents are within a ¼ mile walk of a park or open space facility	No. See response immediately above.
<b>Venice Community Plan</b>		
<b>GOAL 1.</b>	A SAFE, SECURE, AND HIGH QUALITY RESIDENTIAL ENVIRONMENT FOR ALL COMMUNITY RESIDENTS	No. The Proposed Project would include the construction of a high-quality building design and landscaping that are in keeping with the massing, scale, character, and architecture of the adjacent neighborhood. In addition, it would include the provision of safety features, including fencing, gated entry, security cameras, and nighttime lighting.
<b>Objective 1-1</b>	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 to the year 2010.	No. The Project Site is currently vacant and does not include residential uses. Although its current General Plan Land Use designation permits the development of such uses, the construction of Public Benefits Project uses would not substantially affect the potential expansion of the housing stock within the community. Although the community is largely built out, there are additional parcels within the community that could be redeveloped with more intense residential development, provided that the applicable zoning permits these uses and intensities.
<b>Policy 1-1.1:</b>	Protect the quality of the residential environment and the appearance of communities with attention to site and building design.	No. The Proposed Project would include the construction of a high-quality building design and landscaping that complements the massing, scale, character, and architecture of the adjacent neighborhood. The Proposed Project would also be subject to design review by the City's Case Management Division and the Urban Design Studio. Additionally, the Office of Historic Preservation would be consulted to ensure that the proposed use is compatible with the Venice Canals, a City-designated historic resource.
<b>Policy 1-1.3:</b>	Protect existing single-family residential neighborhoods from new out-of-scale development and other incompatible uses.	No. See response immediately above.
<b>Objective 1-3</b>	To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods	No. See response immediately above.



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<b>Policy 1-3.1</b>	Seek a higher degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	No. See response immediately above.
<b>b</b>	Sufficient land for a variety of industrial uses with maximum employment opportunities which are environmentally sensitive, safe for the work force and which have minimal adverse impact on adjacent uses.	No. The Proposed Project entails construction of a Public Facility and does not include Industrial uses. In addition, the current zoning and General Plan Land Use designations do not permit such uses to be constructed on-site. A total of two employees (per shift) would be employed on-site and would work three separate eight-hour shifts. As such, at any given time, these two employees would be on-site to operate and monitor the VAPP and VPP. As noted in the analysis contained in the Draft EIR, the Proposed Project would result in less-than-significant impacts during operation and only short-term impacts related to noise and vibration and greenhouse gases during construction, which is anticipated to last 18 months.
<b>Objective 3-2:</b>	To assure mitigation of potential negative impacts generated by industrial uses when they are located in proximity to residential neighborhoods and to improve the aesthetic quality of industrial uses.	No. See response immediately above. As noted above, the Proposed Project would include the construction of a high-quality building design and landscaping that complements the massing, scale, character, and architecture of the adjacent neighborhood. The Proposed Project would also be subject to design review by the City's Case Management Division and Urban Design Studio. Additionally, the Office of Historic Preservation would be consulted to ensure that the proposed use is compatible with the Venice Canals, a City-designated historic resource.
<b>Policy 3-2.1:</b>	Encourage new industrial uses adjacent to residential neighborhoods to mitigate their impact on the residential neighborhoods to the extent feasible.	No. See response immediately above.
<b>Goal 4</b>	Adequate recreation and park facilities which meet the needs of the residents in the plan area	No. The Proposed Project would add additional green space to the community. As noted above, the Proposed Project would include the provision of two Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas would provide passive recreation areas for adjacent residents and visitors. The provision of these spaces would assist the community in achieving its Community Plan Area goals.
<b>Objective 4-2</b>	To provide facilities for specialized recreational needs by utilizing existing public lands such as flood control channels, utility easements, or Department of Water and Power property.	No. See response immediately above.
<b>Policy 4-2.1:</b>	Flood control channels and other appropriate public lands should be considered for open space and recreational purposes.	No. See response immediately above.

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<b>Objective 4-3:</b>	To ensure the accessibility, security and safety of parks by their users, particularly families with children and senior citizens.	No. As noted above, the Proposed Project would include the provision of two Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas would provide passive recreation areas for adjacent residents and visitors. The provision of these spaces would consider such issues as accessibility, security (including lighting), and safety of patrons, including families with children and senior citizens. The Open Space and any design elements would be subject to design review by the City's Case Management Division and the Urban Design Studio. Additionally, the Office of Historic Preservation would be consulted to ensure that the proposed use is compatible with the Venice Grand Canal and the Ballona Lagoon, a City-designated Historic Resource.
<b>Policy 4-3.1:</b>	Provide local residents and visitors alike adequate access to local recreational facilities.	No. See response immediately above.
<b>Policy 4-3.2:</b>	Ensure that parks are adequately illuminated for safe use at night.	No. See response immediately above.
<b>Goal 5</b>	A community with sufficient open space in balance with new development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources.	No. As noted above, the Proposed Project would include the provision of two Open Space areas, located along the eastern boundary of the VAPP and at a vacant lot at 128 Hurricane Street. These Open Space areas would provide passive recreation areas for adjacent residents and visitors. The provision of these spaces would assist the community in achieving its Community Plan Area goals. They would also allow unobstructed views of scenic resources, including the Grand Canal and Ballona Lagoon. In addition, the analysis contained in the Draft EIR determined that impacts to biological resources would be less than significant during both construction and operation, with the inclusion of mitigation measures.
<b>Objective 5-1</b>	To preserve existing open space resources and where possible develop new open space.	No. See response immediately above.
<b>Policy 5-1.1</b>	Encourage the retention of passive and visual open space which provides a balance to the urban development of the community.	No. See response immediately above.
<b>Policy 5-1.2</b>	The City should encourage continuous efforts by federal, state and county agencies to acquire vacant land for publicly-owned open space.	No. The Proposed Project would facilitate the acquisition of additional vacant land for publicly-owned Open Space at 128 Hurricane Street. This lot would be used for public parking and Open Space that would lead to the Esplanade Walking Trail.
<b>Policy 5-1.3</b>	Protect significant environmental resources from environmental hazards.	No. As noted above, the VPP is a critical City facility and currently has no mechanism to by-pass sewage flows from the CIS and therefore, must remain operational continuously. In the event of a natural disaster or unexpected emergency, the provision of additional pumps

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
		and associated redundancy would likely allow the facility to operate, thereby reducing the potential for catastrophic system failure and emergency discharges of sewage to the Grand Canal, Ballona Lagoon, or adjacent street network.
<b>Policy 5-1.4</b>	Protect and maintain unique open space areas, including the Venice Canals, Venice Grand Canal, Ballona Lagoon and beaches.	No. With the exception of temporary construction within the Grand Canal associated with the CIS diversion structure, the Grand Canal would not be permanently affected and would maintain its unique Open Space area. The proposed CIS diversion structure would be constructed underground beneath the Grand Canal and would not protrude into the water column, nor would it be visible from the water surface.
<b>GOAL 12</b>	A system of safe, efficient and attractive bicycle and pedestrian routes	No. The Proposed Project does include a bicycle or pedestrian route on 128 Hurricane that leads to the Ballona Lagoon Esplanade Trail. Also, the Proposed Project would include new Coastal Access and Open Space accessible to this new walkway. However, a portion of Esplanade from the northern boundary of the VAPP to the eastern terminus of Hurricane Street would be temporarily closed to the public during construction of the CIS diversion structure in the Venice Grand Canal. Alternate existing access would be available via Canal Court at Esplanade and Galleon Street.
<b>Objective 12-1</b>	To promote an adequate system of safe bikeways for commuter, school and recreational use.	No. See response immediately above.
<b>Policy 12-1.2</b>	Identify bicycle routes along major and secondary arterials in the community.	No. The Proposed Project does not include the provision of bicycle or pedestrian routes. However, it should be noted that the project would not preclude the development of designated bicycle routes along major and secondary arterials in the community.
<b>Policy 12-1.3</b>	Assure that local bicycle routes are linked with the routes of neighboring areas of the city.	No. See response immediately above.
<b>Objective 12-2</b>	To promote pedestrian-oriented access and routes that are safe, efficient and attractive for commuter, school and recreational use, and facilitate economic activity and access to transit facilities.	No. A portion of Esplanade from the northern boundary of the VAPP to the eastern terminus of Hurricane Street would be temporarily closed to the public during construction of the CIS diversion structure in the Venice Grand Canal. Alternate existing access would be available via Canal Court at Esplanade and Galleon Street.
<b>Policy 12-2.1</b>	Encourage the safe utilization of easements and/or rights-of-way along flood control channels, public utilities, railroad rights-of-way, and streets wherever feasible for the use of bicycles and/or pedestrians.	No. While construction of the Proposed Project will impact the use of the sidewalk along the Grand Canal by bicycles and pedestrians, an alternate route along Canal Court at Galleon Street will be provided during the construction phase. Pedestrian and bicycle access will be restored when construction is complete. Also, when the Proposed

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
		Project is complete, the development of the 128 Hurricane Street lot will provide additional new Open Space with pedestrian access adjacent to the Ballona Lagoon, leading to the Ballona Lagoon Esplanade Trail.
<b>Policy 12-2.2</b>	Require the installation of sidewalks in all new roadway construction and in significant reconstruction of existing roadways.	No. The Proposed Project does not include new roadway construction or significant reconstruction of existing roadways; however, the southerly boundary of the VAPP site would include improved sidewalks.
<b>Objective 12-3</b>	To protect, maintain and improve pedestrian access to coastal resources including the system of walk streets.	No. The Proposed Project includes improvement of Coastal Access at 128 Hurricane Street by introducing new Open Space with additional pedestrian access leading to the Ballona Lagoon Esplanade Trail. During construction, temporary closure of the Esplanade, from the northern boundary of the VAPP to the eastern terminus of Hurricane Street, would be required. However, existing alternate access along Canal Court at Esplanade and Galleon Street would be maintained, which would provide the public with adequate access options to the Grand Canal and Ballona Lagoon and associated Esplanade and interpretive trails.
<b>Policy 12-3.1</b>	Implement all the policies and programs pertaining to pedestrian access to coastal resources contained in the Venice Coastal Zone Land Use Plan.	No. See response immediately above. The Proposed Project would not hinder pedestrian access to Coastal Resources, as contained in the Venice Coastal Zone Land Use Plan.
<b>Goal 13</b>	A sufficient system of well designed and convenient onstreet parking and off-street parking facilities throughout the plan area	No. The Proposed Project will provide a total of eight parking spaces at the 128 Hurricane Street lot. A total of four parking spaces would be provided to serve employees, one space for the Beach Impact Zone parking requirement, and relocated parking spaces, which would be removed from the southerly boundary of the Proposed Project along Hurricane Street between Canal Court and Esplanade and relocated to 128 Hurricane Street. Two existing non-public off-street parking spaces at the VPP would be maintained inside the existing VPP. The analysis contained in the Draft EIR determined that impacts related to the relocation of existing public parking spaces at the eastern terminus of Hurricane Street would result in less-than-significant parking impacts and no mitigation measures would be necessary.
<b>Objective 13-1</b>	To provide an adequate supply of parking at appropriate locations in accordance with Citywide standards and community needs.	No. See response immediately above.

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Goal 17</b>	Preservation and restoration of cultural resources, neighborhoods and landmarks which have historical and/or cultural significance	No. The Proposed Project would include the construction of a high-quality building design and landscaping that would complement the massing, scale, character, and architecture of the adjacent neighborhood. The Proposed Project would also be subject to design review by the City's Case Management Division and the Urban Design Studio. Additionally, the Office of Historic Preservation would be consulted to ensure that the proposed use is compatible with the architectural styles of the Venice Canals, a City-designated historic resource.
<b>Objective 17-1</b>	To ensure that the Community's historically significant resources are protected, preserved and enhanced.	No. See response immediately above.
<b>Goal 18</b>	Preservation of the scenic and visual qualities of coastal areas.	No. See response immediately above. In addition, the Proposed Project would include the provision of two Open Space areas. One space would be located along the eastern boundary of the VAPP adjacent to the Venice Grand Canal. The other would be located at a vacant lot at 128 Hurricane Street, adjacent to the Ballona Lagoon. Both Open Space areas would help to preserve the scenic and visual qualities of coastal areas by providing expansive view opportunities of the Grand Canal and Ballona Lagoon. In addition, the analysis contained in the Draft EIR determined that visual impacts associated with the Proposed Project would be less than significant with the inclusion of mitigation measures.
<b>Policy 18-1.1</b>	The location and amount of new development should maintain and enhance public access to the coast.	No. The Proposed Project would require temporary closure of Esplanade, from the northern boundary of the VAPP to the eastern terminus of Hurricane Street during construction of the CIS diversion structure within the Grand Canal. During construction, existing alternate access along Canal Court at Esplanade and Galleon Street would be maintained to provide the public with adequate access options to the Grand Canal and Ballona Lagoon and associated Esplanade and interpretive trails.
<b>Policy 18-1.2</b>	The protection of estuaries and wetlands and the restoration and protection of the Venice Canals	No. As noted above, pending completion of the CIS diversion structure within the Venice Grand Canal, the western bank of the canal would be restored with native plant communities, consistent with Coastal Commission Coastal Development Permit 5-91-584. In addition, runoff originating from the Proposed Project would be captured on-site, retained, and treated and no flows would be allowed to enter either the Grand Canal or Ballona Lagoon.

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Design Principles for New Development</b>	<p>Any development occurring in the Venice Coastal zone is regulated by the Venice LUP and the Venice Coastal Zone Specific Plan.</p> <ol style="list-style-type: none"> <li>1. Development will be guided by the following design principles:               <ol style="list-style-type: none"> <li>a. New development will be located in areas best served by existing road and utility systems.</li> <li>b. The design of new development will mitigate the impact of the new traffic generated on coastal recreation access roads.</li> <li>c. New development will be concentrated to preserve identified coastal resource values (i.e., wetlands, view corridors).</li> <li>e. Views of distinctive visual resources (e.g., bluffs, wetlands) will not be significantly disturbed.</li> <li>h. Open space buffer areas between new development, identified wetlands and support areas will be established.</li> </ol> </li> </ol>	<p>No. As noted above, the Proposed Project qualifies as a Public Benefits Project and must comply with the Venice Specific Plan Development Standards, which include findings of consistency with the Venice Coastal Land Use Plan. The Proposed Project would consist of a high-quality design and landscaping that is consistent with the scale, massing, character, and architecture of the adjacent neighborhood. The Proposed Project also includes the provision of two Open Space areas. One would be located along the eastern boundary of the VAPP adjacent to the Grand Canal, while the other would be located at 128 Hurricane Street on a vacant lot. They would serve as buffer areas between the VAPP and these wetland resources and would provide expansive views of the Grand Canal and Ballona Lagoon. Moreover, the analysis contained in the Draft EIR determined that biological resources, traffic and transportation, and view-related impacts would be less than significant with the implementation of mitigation measures.</p>
<b>Coastal visual Resources</b>	<ol style="list-style-type: none"> <li>1. Protect existing views of the wetlands from the surrounding public streets and open space areas.</li> <li>4. Landscaping and plant materials should be used to screen and soften visually obtrusive elements.</li> </ol>	<p>No. The analysis contained in the Draft EIR determined that Proposed Project impacts related to views would be less than significant with the implementation of mitigation measures. As noted above, the Proposed Project would include two Open Space areas that would provide expansive views of the Grand Canal and Ballona Lagoon, thereby protecting views of the wetlands. In addition, the building design and landscaping would be high-quality and would consider such elements as screening and softening visually obstructive elements.</p>
<b>Hazards Areas</b>	<ol style="list-style-type: none"> <li>3. Future development must be based on thorough site specific geologic and soils studies including specific geotechnical studies related to mitigation of liquefaction and lateral spreading.</li> <li>4. All future development shall utilize earthquake-resistant construction and engineering practices particularly those intended for high density of human occupancy. Preliminary engineering mitigation and structural setbacks shall be designed for a bedrock acceleration of 0.5 g and high potential for liquefaction, unless a reliable geologic survey indicates otherwise.</li> <li>5. Consider the effect of seismic sea waves in land use planning and development siting.</li> </ol>	<p>No. The analysis contained in the Draft EIR determined that Proposed Project impacts related to geology and soils and hazards, including seismic sea waves and liquefaction, would be less than significant with the implementation of mitigation measures.</p>
<b>Public Works</b>	<ol style="list-style-type: none"> <li>1. Public works improvements in the study area shall be designed to protect sensitive habitat resources, accommodate new development permitted in the area and provide for future public access needs.</li> <li>4. Installation of new sewer and water lines will be accomplished via the least environmentally disturbing method.</li> </ol>	<p>No. The analysis contained in the Draft EIR determined that Proposed Project impacts related to biological resources would be less than significant with the implementation of mitigation measures. As noted above, during construction of the CIS diversion structure within the Grand Canal, access along the Esplanade, between the northern</p>

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	5. Water conservation technology should be employed in the installation and operation of additional water service.	boundary of the VAPP and the eastern terminus of Hurricane Street, would not be available. During construction, there would be adequate existing access to both the Grand Canal and Ballona Lagoon along Canal Court at Esplanade and Galleon Street. Installation of new sewer and water lines would be made via adjacent connections and would be installed in a manner that would not be environmentally disturbing and would adhere to City requirements. The Proposed Project would include xeriscape landscaping and crushed granite or rock in outside surface areas, except for the two Open Space areas (described above). Water conservation measures required by the City would be implemented, as applicable.
<b>Recreation and Park Facilities and Open Space</b>	2. Ensure that parks, beaches and canals are adequately illuminated for safe use at night where appropriate. 4. Coordinate with the Department of Recreation and Parks and the Police Department to ensure adequate police patrols and the utilization of “defensible space” in the design of recreation and park facilities. 9. Target the provision of parks and recreation facilities in areas with the greatest deficiencies.	No. The two Open Space areas proposed along the eastern boundary of the VAPP and vacant lot at 128 Hurricane Street would be planned and designed in a manner that considers safety, including lighting. As noted above, the proposed Open Spaces would assist the Community Plan Area in achieving its Open Space and park acreage goals.
<b>Community Design and Landscaping Guidelines</b>		
<b>Street Lighting</b>	3. Any new street lighting or pedestrian lighting system built in the public right-of-way must be designed to currently adopted City standards. Equipment must be tested and approved by the Bureau of Street Lighting. 4. New lighting systems will be designed to minimize glare and “light trespass”.	No. As noted in the analysis contained in the Draft EIR, project impacts related to lighting (including glare) were determined to be less than significant with mitigation measures.
<b>Venice Coastal Zone Specific Plan</b>		
<b>Section 10. A. Ballona Lagoon West Bank</b>	1. Height. Within 60 feet of the mean high tide of the Ballona Lagoon or inland side of the Esplanade (City right-of-way), whichever is furthest from the water as determined by a licensed surveyor, Venice Coastal Development Projects shall not exceed a maximum height of 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet. No portion of any structure (including Roof Access Structures, roof deck railings and Architectural Features) shall exceed the 30 foot height limit within 60 horizontal feet of the mean high tide line of Ballona Lagoon or the inland side of the Esplanade, whichever is furthest from the water.	No. See response above provided for Policy I.A.7. Multi-Family Residential – Low Medium II Density.

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
	<p>b. Lots located north of Ironsides Street:</p> <p>(1) All Venice Coastal Development Projects shall be set back an average of 15 feet but not less than ten feet from the lot line nearest to the water.</p> <p>(2) An open, Permeable yard with an area of at least 15 times the lot width and a minimum of 450 square feet shall be maintained between the property line that faces the water and the front of any structure. No building extensions, including stairs and balconies, shall be allowed in the required Permeable yard area, except for ground level Permeable decks that do not exceed 18 inches in height.</p> <p>(3) The combined height of any decks, railings, garden walls and fences situated within the required Permeable yard shall not exceed six feet above the elevation of the adjacent public walkway.</p> <p>(4) The sideyard shall be consistent with LAMC requirements, but shall not be less than 3 1/2 feet.</p>	<p>No. See response above provided for Policy I.A.7. Multi-Family Residential – Low Medium II Density. In addition, as noted above, the Proposed Project would include an Open Space area located along the eastern boundary of the VAPP adjacent to the Grand Canal and which would extend from the northern boundary to the eastern terminus of Hurricane Street. Moreover, electrical building would be constructed adjacent to Canal Court, approximately 50 feet west of Esplanade. The intervening areas would be comprised of hatches uses to access the submersible pumps and would include landscaping and permeable surfaces. The building design does not include any decks, railing, or garden walls. A RW2-1 Zone Yard Adjustment will be needed because the transformers in the rear yard encroach over 6 feet. Fencing would not exceed four feet above the elevation of the adjacent public walkway (Canal Court).</p>
	<p>3. Fill. No Fill shall be permitted in the lagoon and buffer area, except for the minimum amount necessary for habitat restoration and public access.</p> <p>4. Drainage. Prior to issuance of a building permit for a new Venice Coastal Development Project or an expansion of the existing building footprint by more than ten percent, the applicant shall submit drainage plans to the Department of Building and Safety for its approval. All drainage for new construction shall be directed away from Ballona Lagoon. The applicant and all successors in interest shall maintain the approved Venice Coastal Development Project consistent with the drainage plans approved by the Department of Building and Safety.</p>	<p>No. See response above provided for Policy I.A.7. Multi-Family Residential – Low Medium II Density. In addition, per City requirements drainage plans would be submitted to the Department of Building and Safety. As noted above, the analysis contained in the Draft EIR determined that project impacts related to hydrology and water quality were less than significant with the mitigation measures.</p>



### 3.8.3 Environmental Impact Analysis

#### 3.8.3.1 Methodology

Potential significant impacts associated with the Proposed Project were based upon a review and assessment of applicable land use and zoning documents (see Table 2-1 [Chapter 2, Project Description]) of this EIR for a list of required permits), including the City of Los Angeles Municipal Code, the Venice Specific Plan, the City of Los Angeles General Plan Safety Element and Land Use Element (Venice Community Plan), and the Venice Local Coastal Program Land Use Plan. Permits and/or planning entitlements that may be pursued for this project include Public Benefits Project Permit review, Venice Specific Plan Project Permit Compliance review, Conditional Use for Parking, RW2-1 zone Adjustment for Yards, and California Coastal Commission Coastal Development Permit. City of Culver City requirements concerning the temporary use of Laydown Area 3 for soil stockpiling are also considered and evaluated.

Based upon these documents, an analysis was prepared to determine if the Proposed Project is consistent with the land use designations and zoning, as well as the applicable goals, objectives, and policies. Table 3.8-2 contains the results of the analysis and indicates if the Proposed Project would be “inconsistent.” If an “inconsistent” determination is indicated, impacts related to land use and planning are not necessarily considered potentially significant since the overall context and intent must also be considered. Therefore, the discussion below identifies potential project-related impacts and the measures that would be required to mitigate these, if they are found to be potentially significant.

#### 3.8.3.2 Screening Analysis

As noted in Section Chapter 1.0, Introduction, the analysis and conclusions contained in the Initial Study (see Appendix A [Notice of Preparation/Initial Study] of this EIR) prepared for the Proposed Project considered and then eliminated a number of impacts from further analysis, including those contained in CEQA Appendix G and the *L.A. CEQA Thresholds Guide* (2006). Therefore, only those impacts and corresponding thresholds of significance noted below were determined to require further analysis and are addressed in this EIR.

#### 3.8.3.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant impact on land use and planning if it would:

**PLNG-1.** Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

According to the *L.A. CEQA Thresholds Guide*, a determination of significance shall be made on a case-by-case basis, considering the following factors:

**PLNG-2.** Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site;

**PLNG-3.** Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;

**PLNG-4.** The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area; and

**PLNG-5.** The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

### 3.8.3.4 Construction Impacts

As noted in Table 2-1 (see Chapter 2, Project Description, of this EIR), there are land use entitlements and discretionary actions that would need to be obtained prior to the construction of the Proposed Project and therefore, it is assumed that these would be secured in advance of any construction activities. Similarly, as noted in Table 3.8-2, there are applicable goals, objectives, and policies that must be considered in approving the Proposed Project. These plans have been established in order to protect the environment and adjacent sensitive land uses and to ensure that the Proposed Project is consistent with the neighborhood's character and scale. As such, this section discusses the potential impacts that could occur during construction related to land use and zoning. As noted below, with compliance with applicable planning and zoning requirements, all impacts can be reduced to less than significant levels and no mitigation measures are required.

**PLNG-1. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.**

As shown in Figures 3.1-3B (see Section 3.1, Aesthetics of this EIR) and described in Chapter 2 (Project Description), the Proposed Project would include a two-story electrical and control building, three submersible pumps, and an associated valve and metering vault. The building would be constructed along the westerly boundary of Project Site, would be approximately 32 feet in height, 50 feet in length, and 2,500 square feet (both levels combined) in area. The Project Site is zoned RW2-1 (Residential Waterways Zone), which allows for residential uses.

Laydown Area 2 is comprised of two lots, one located on private property and one owned by the County of Los Angeles. Laydown Area 1 is located on public land owned by the City of Los Angeles. Laydown Areas 1 and 2 are zoned RW2-1 (Residential Waterways Zone), which are intended for residential uses. Laydown Area 3 is located off-site in Culver City, seven miles east of the Project Site, and is intended for industrial uses.

Proposed building finishes include architectural stamped concrete, reveals, and impressions; metal awnings over each of the exterior doors and sustainable roofing (Sika Décor or similar); and painted surfaces with colors that blend in with the surrounding neighborhood. Windows would be located on the second level of the occupied space where employees work. It also includes the improvement of an adjacent lot that would contain a total of eight parking spaces, an option for public art, and open space. The design of the building and accessories include encroachment over six feet into the rear yard. The Proposed Project is considered a Public Facilities use, which is not allowed by right in a RW2-1 zone or in a Medium Residential land use designation.

The Proposed Project qualifies as a Public Benefits Project under the public utilities and public services use per LAMC Article 14, Section 14.00(b). Additional discretionary actions such as a Specific Plan Adjustment for Yards, Conditional Use for Parking would have to be processed with the Public Benefits Project Permit. Therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and impacts are **less than significant**. No mitigation is required.

As noted previously, although the Venice LCP-LUP has been adopted by the City of Los Angeles, the Venice LCP-LUP has not been certified by the California Coastal Commission. Therefore, the VCP land use designation of Medium Residential and Open Space apply to the Project Site and Venice Grand Canal, respectively. Section 12.04.05.B.1(a) of the LAMC states that parks and recreation facilities, including bicycle trails, walking trails, nature trails used for park and recreation purposes; natural resource preserves including waterways; marine and ecological preserves, sanctuaries and habitat protection sites are all compatible with the Open Space land use designation.

The Open Space land use designation would not be affected since construction activities in the Venice Grand Canal associated with the diversion structure would be temporary, constructed below the canal, and would not protrude into the water column. Similarly, Laydown Areas 1 and 2 would only be used during construction of the Proposed Project and no permanent uses associated with the VAPP (excepting parking at Laydown Area 1) would be constructed on these parcels. As such, their current zoning of RW2 and General Plan land use designations of Medium Residential would not need to be changed. Therefore, neither construction of the diversion structure in the Venice Grand Canal nor use of Laydown Areas 1 and 2 would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and impacts would be less than significant. No mitigation is required.

Construction of the Proposed Project would require the use of machinery, materials, and personnel. These activities would require an area large enough to perform these operations safely and efficiently. As such, two temporary street closures would be required for the duration of the construction period; Hurricane Street between Canal Court and Esplanade; and Canal Court, extending from the VAPP's northern property boundary to Esplanade (see Figure 2-2, Project Location Map, in Chapter 2 of this EIR). The Proposed Project would be required to obtain a Temporary Street Closure permit from the Bureau of Street Services prior to construction to reduce impacts. This would ensure that the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and therefore, impacts would be **less than significant** and no mitigation is required.

Construction activities within the Venice Grand Canal are under supervision of the U.S. Army Corps of Engineers and would be required to obtain applicable permits. Therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Impacts would be **less than significant** and no mitigation is required.

Construction of the diversion structure within the Venice Grand Canal would also require a number of preparation activities, including shoring, excavation, and construction of the temporary coffer dam. These activities would require work within the Venice Grand Canal and a portion of its western bank (see Figure 2-2, Project Location Map, in Chapter 2 of this EIR). Similarly, construction of the VAPP would entail the construction and installation of both above and belowground facilities, including the two-story electrical building and control facility and three submersible pumps and associated valve and metering vault. These activities within the Venice Grand Canal and Project Site

would be required to obtain necessary permits (see Table 2-1 in Chapter 2 of this EIR), including a Permit to Construct, prior to construction. Issuance of these permits would ensure that the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be **less than significant** and no mitigation is required.

Stockpiling of soils and materials would be needed at all the Laydown Area sites during the construction period. Since three of these sites are owned by the City of Los Angeles, access for the other lot (owned by the County of Los Angeles) would need to be obtained from the property owners. For the privately owned parcel, a permission to enter (PTE) and encroachment permit would need to be obtained. The PTE and encroachment permit would need to be secured in advance of any construction permits. Similarly, a temporary use permit would be required from the City of Culver City to utilize Laydown Area 3. Issuance of these permits would ensure that the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant** and no mitigation is required.

Minor grading may be required prior to excavation activities in order to prepare the Project Site for construction and the parking and open space area associated with the Laydown Areas. No grading is proposed for Laydown Areas 2 or 3. Once the Project Site is excavated and backfilled, additional minor grading may be required to construct the electrical building pad and to ensure proper drainage of the site. Grading activities would require a Permit to Construct, which would ensure that the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a General Plan, Specific Plan, Local Coastal Program, or Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant** and no mitigation is required.

The Venice Coastal Specific Plan establishes the amount of required parking for the Proposed Project and the California Coastal Act protects coastal street parking. Five parking spaces are required for the Proposed Project that would be located on the 128 Hurricane lot, within 750 feet of the Project Site. A Conditional Use Permit for Parking on this lot would be pursued in order for the parking requirements to be consistent with the Venice Specific Plan. On-street parking spaces located on Hurricane Street west of Canal Court are proposed to be relocated on the 128 Hurricane Street lot. Therefore, a total of eight parking spaces will be provided at the 128 Hurricane Street lot. Issuance of a Conditional Use Permit and a Coastal Development Permit would ensure that the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant** and no mitigation is required.

Because the Proposed Project would represent a new Public Facilities use within a Residential zone, it will need to be designed and constructed in a manner that is in keeping with the character of the existing residential neighborhood and as identified in the City's Municipal Code. The project would be required to adhere to goals, objectives, and policies related to siting and design, as contained in

the VCP and VSP. Although the exterior conceptual design has not been finalized, design features that are in keeping with the architecture, massing, and materials that are currently present on the adjacent residential structures will be provided.

The VLCPLUP and VSP have established urban development and design guidelines to ensure that development projects within the community are consistent with the character and scale of the neighborhoods in which they are proposed. Since the Land Implementation Plan of the Venice LCP has not been approved by the California Coastal Commission, the VSP is the controlling document for urban design and development standards for projects proposed within the Venice Coastal Zone. A review of the VSP indicates that there are no specific Design Guidelines for Public Facilities, such as the Proposed Project. In such incidents, and as noted in the VSP, the regulations of the Los Angeles Municipal Code apply. The Residential Citywide Design Guidelines are part of the City's General Plan Framework element and serve to implement the City's 10 Urban Design Principles.

The Proposed Project went through the Department of City Planning's Urban Design Studio and the Development Services Center required Design Review. They facilitated the application of design objectives and compliance with all planning requirements, including the VCP, VSP, and the VLCPLUP. These Design Guidelines do not supersede regulations in the municipal code.

In addition, due to its location adjacent to the Venice Grand Canal, a recognized historic resource (see Section 3.4, Cultural Resources of this EIR), it underwent design review by the City of Los Angeles Office of Historic Preservation to ensure its compatibility and consistency with this resource and the neighborhood in which it is proposed.

Through adherence to applicable plans and undergoing required design review, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant** and no mitigation is required.

The Residential Citywide Design Guidelines and Land Use and Development Regulations in the VSP would not apply to Laydown Areas 1 and 2, or to the diversion structure in the Venice Grand Canal, as these areas would not include permanent structures once construction of the Proposed Project is completed.

Therefore, the temporary use of all the Laydown Areas and construction of the diversion structure within the Venice Grand Canal would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, impacts would **be less than significant**.

**PLNG-2. Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site.**

As noted above, impacts would be **less than significant** related to inconsistency with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site and no mitigation is required.

**PLNG-3. Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.**

Based upon the analysis above, impacts would be **less than significant** and no mitigation is required.

**PLNG-4. The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area.**

The Venice Pumping Plant (VPP) was built in 1957 and the two vacant parcels proposed for the VAPP were obtained for future public facility uses. The residential land uses surrounding the Project Site were constructed subsequent to this time period beginning in the mid-1960s (see Section 3.4, Cultural Resources of this EIR) and continuing through the 2000s. The VPP is identified as the earliest building in the area. As noted above, the neighborhood is primarily comprised of residential uses, including single- and multi-family and is almost entirely built out. The construction of the VAPP represents a continuation of the Public Facilities use and which was present in the 1950s and was the first urban use in the neighborhood. As noted above, the Public Benefits Project section of the LAMC permits a Public Facility to be constructed in both the General Plan Land Use designation and LAMC zoning. In addition, the Proposed Project is required to obtain permits or entitlements in advance of construction activities. This would bring the Proposed Project into compliance with applicable plans and policies and ensure that a design review of proposed structures and materials by the Development Services Unit and Office of Historic Preservation are undertaken to consider its proximity to the Venice Grand Canal, a Historic Resource, and the neighborhood scale and character. As such, impacts related to the extent of the area that would be affected, the nature and degree of impacts, and the type of land uses within that area would be **less than significant** and no mitigation is required.

**PLNG-5. The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.**

The analysis contained in this EIR has determined that all impacts, with the exception of short-term construction-related noise and vibration impacts can be mitigated to less than significant levels with standard regulatory requirements or the implementation of mitigation measures (see Sections 3.1 through 3.11 of this EIR). In the case of construction-related noise and vibration impacts, these would be significant and unavoidable, even with mitigation incorporated, during the construction period, which is expected to last two years. Cumulative noise and vibration impacts during construction would also be significant and unavoidable. Therefore, the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project during construction would be **significant and unavoidable**, even with the application of mitigation measures **MM NOI-1** and **MM NOI-2** identified in this EIR (see Section 3.9, Noise and Vibration).

### **3.8.3.5 Operational Impacts**

This section discusses the potential impacts that could occur during operations related to land use and zoning and mitigation measures that may be required. As noted below, impacts are less than significant and no mitigation is required.

**PLNG-1. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.**

Hurricane Street, between Canal Court and Esplanade currently separates the existing VPP from the proposed VAPP. Control of the two facilities would be administered via the control facility, housed in the two-story electrical building, once the construction of the VAPP is complete. Maintenance

activities, deliveries, and on-site operations would require employees and visitors to frequently enter and exit these two separate, but adjacent facilities. The curb along Hurricane Street, adjacent to the new VAPP site, would be changed to red and/or a driveway. The current on-street parking would be relocated to the 128 Hurricane Street lot. Because the VPP and VAPP are considered critical facilities, access would need to be controlled at all times. As discussed in Chapter 2 (Project Description), this would be achieved via security cameras, lighting, and perimeter fencing. Project parking for the VAPP would be located at the 128 Hurricane Street, just west of the existing VPP site. Therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant**.

Impacts to land use and zoning were discussed previously and determined to be less than significant. Therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and no mitigation measures are required.

**PLNG-2. Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site.**

Impacts related to consistency with an adopted land use plan were discussed previously and determined to be less than significant. Therefore, the Proposed Project would be consistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site, and as such impacts would be **less than significant**, and no mitigation is required.

**T-PLNG-3. Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.**

Impacts related to consistency with an adopted land use plan, environmental goals or policies, or other applicable plans were discussed previously (see Table 3.8-2) and determined to be less than significant. Therefore, the Proposed Project would be consistent with the General Plan or adopted environmental goals or policies contained in other applicable plans, and as such impacts would be **less than significant**, and no mitigation is required.

**T-PLNG-4. The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area.**

Impacts related to the extent of the area, the nature and degree, and types of land uses within the area were discussed previously and determined to be less than significant. Therefore, the project-related impacts to the extent of the area that would be affected, the nature and degree of impacts, and the type of land uses within that area would be **less than significant**, and no mitigation is required.

**T-PLNG-5. The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.**

The analysis contained in this EIR has determined that all operational impacts can be mitigated to less than significant levels with standard regulatory requirements or the implementation of mitigation measures (see Sections 3.1 through 3.11 of this EIR). Therefore, the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the

Proposed Project would be **less than significant with application of standard regulatory requirements, project design low-impact development features, and mitigation measures MM AES-3, MM GEO-1, and MM NOI-3**, identified in this EIR.

### 3.8.4 Mitigation Measures

There are no mitigation measures required for the Proposed Project directly related to land use and planning. Secondary impacts to surrounding land uses that could result from construction of the Proposed Project are addressed with mitigation measures MM AES-1, MM AES-2, MM BIO-1 through MM BIO-9, MM CUL-1, MM NOI-1, MM NOI-2, and MM TRAF-1. Secondary impacts to land uses that could result from Proposed Project operations are addressed with mitigation measures MM AES-3, MM GEO-1, and MM NOI-3.

### 3.8.5 Significant Unavoidable Adverse Impacts

There are no direct significant unavoidable adverse impacts to land use and planning from implementation of the Proposed Project. However, secondary impacts to surrounding land uses related to construction noise and vibration are significant and unavoidable.

### 3.8.6 Cumulative Impacts

The Proposed Project area is comprised of built out urban land uses. The Proposed Project represents in-fill development within this existing environment and includes the construction of a public facility adjacent to the City's existing VPP. The related projects identified in Table 1-1, Related Projects List (see Chapter 1.0, Introduction of this EIR), primarily include infrastructure improvement projects, reflective of the built-out nature of the area. The cumulative projects identified would not result in cumulative impacts related to land use and planning since they do not entail new development that would conflict with the existing area uses. Similarly, the Proposed Project would represent a continuation of an existing use contained within a built-out area and which pre-dates the uses currently occupying the area. Given this, cumulative land use and planning impacts would be **less than significant**.