

**Z.I. NO. 2406**  
**SMALL LOT SUBDIVISION**  
**REVISED DIRECTOR'S INTERPRETATION**

**COUNCIL DISTRICT: 11**

**GENERAL REQUIREMENTS AND PRINCIPLES:**

On October 23, 2014, case number DIR-2014-2824-DI-1A was approved by the City Planning Commission. The Director's Interpretation clarifies the Venice Coastal Specific Plan (Ordinance No. 175,693), as it relates to Section 12.22 C. 27 of the Los Angeles Municipal Code, established by the Small Lot Subdivision Ordinance (No. 176,354). The Director's Interpretation applies to all Small Lot Subdivision cases within the boundary of the Venice Coastal Zone Specific Plan.

The subject Director's Interpretation determines how the Small Lot Subdivision provisions shall be applied within the Venice Coastal Zone Specific Plan.

The Director's Interpretation shall be effective on or after October 23, 2014. Any project application deemed complete after this date, shall be subject to the Director's Interpretation contained herein. This Director's Interpretation supersedes the previous interpretation issued by the City Planning Commission on February 12, 2010 (Case No. DIR-2008-4703-DI-1A).

**Instructions:**

Refer all applicants who wish to submit an application for a Small Lot Subdivision (SL) within the boundary of the Venice Coastal Zone Specific Plan to the Department of City Planning Plan Implementation Division and Subdivisions staff.

The Director's Interpretation language is attached, covering the general requirements and principles.

The Director's Interpretation is as follows:

1. Where provisions in the Venice Coastal Zone Specific Plan differ from provisions contained in Chapter 1 of the Los Angeles Municipal Code (LAMC), the Venice Coastal Zone Specific Plan shall supersede those other regulations. Where provisions are silent in the Venice Coastal Zone Specific Plan, regulations of the Los Angeles Municipal Code (LAMC) apply, including Section 12.22 C.27.
2. APPLICABILITY OF SMALL LOT ORDINANCE IN THE VENICE COASTAL ZONE SPECIFIC PLAN: Notwithstanding LAMC Section 12.22.C.27 (Small Lot Ordinance), small lot projects within the Venice Coastal Zone Specific Plan shall adhere to multi-family development procedures and standards established within the Specific Plan. Additionally, any standards which further restrict lot area, density, setbacks, stepbacks, lot coverage, open space, driveway access and/or parking shall apply to the entire subdivided area, including individual resulting small lots.

Applications for small lot developments within the Venice Coastal Zone Specific Plan shall be subject to Director of Planning review pursuant to Section 8 of the Specific Plan, either "Director of Planning Sign-Off" or "Project Permit Compliance Review", depending on the location of the project and number of dwelling units proposed. Project Permit Compliance review shall be completed concurrent with any application for a subdivision.

3. PARKING: Required parking for subdivision projects shall be based on the parking requirements for multiple dwelling uses, based on the width of the pre-subdivided lot, pursuant to Section 13.D of the Venice Coastal Zone Specific Plan. Beach Impact Zone Parking, if applicable, shall be provided pursuant to Section 13.E of the Specific Plan, consistent with multi-family parking requirements.
4. DRIVEWAYS: Pursuant to the Venice Coastal Zone Specific Plan, all driveways and vehicular access shall be from alleys, when present. When projects abut an alley, each newly resulting subdivided lot shall be accessible from the alley and not the street. Exceptions may be made for existing structures where alley access is infeasible.
5. SETBACKS: Front, rear, and side yard setbacks and lot coverage and open space requirements within each lot resulting from a small lot subdivision shall be consistent with the Specific Plan, where it sets limitations, if applicable. In the Ballona Lagoon West Bank and Ballona Lagoon (Grand Canal) East Bank Subareas, side yard setbacks on all lots within a small lot project must be 3.5 feet in width, consistent with Sections 10.A.2.b(4) and 10.B.2.b.3(d) of the Specific Plan. This requirement is in addition to the 5-foot setback where the lot abuts another lot not created pursuant to the small lot subdivision ordinance, pursuant to LAMC Section 12.22.C.27(e).
6. MULTIPLE LOTS: Existing lots may be subdivided into multiple small lots so long as the averaged newly resulting lot size is equivalent to the minimum requirement for "lot area per dwelling unit" established for each residential zone in the LAMC, except where minimum lot sizes per dwelling unit are further restricted in the Specific Plan, such as in the Marina Peninsula (D), North Venice (F), and Oakwood, Millwood, Southeast Venice (G) Subareas. For example, a 4500 square foot parcel in the RD1.5 zone may be subdivided into a maximum of 3 small lots with one measuring 1000 square feet, one measuring 1800 square feet and one measuring 1700 square feet, given that the

average lot size is 1500 square feet. However, if the same 4500 square foot parcel in the RD1.5 zone is located in the North Venice (F) or Oakwood, Millwood, Southeast Venice (G) Subareas, each lot must not be less than 1,500 square feet per dwelling unit.

7. DENSITY: The density of combined newly created lots shall not exceed the density permitted by zoning of the original, pre-subdivided lot, which is the "lot area per dwelling unit" restriction for each subarea and each zone, as determined by the Venice Coastal Zone Specific Plan. Where the Specific Plan is silent with respect to density, the density shall be based on the underlying zone in the Los Angeles Municipal Code.

CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING  
ZONING INFORMATION FILE

**Z.I. NO. 2406**  
**SMALL LOT SUBDIVISION**  
**DIRECTOR'S INTERPRETATION**

**Applies to projects deemed complete prior to Oct 23, 2014.**

**COUNCIL DISTRICT: 11**

**COMMENTS:**

On June 11, 2009, case number DIR-2008-4703-DI-1A was approved by the City Planning Commission. The Director's Interpretation clarifies the Venice Coastal Specific Plan (Ordinance No. 175,693), as it relates to Section 12.22 C. 27 of the Los Angeles Municipal Code, established by the Small Lot Subdivision Ordinance (No. 176,354). The Director's Interpretation applies to all Small Lot Subdivision cases within the boundary of the Venice Coastal Specific Plan.

**INSTRUCTIONS:**

Refer all applicants who wish to submit an application for a Small Lot Subdivision (SL) within the boundary of the Venice Coastal Specific Plan to require a Planning clearance to the Department of City Planning Community Planning Bureau, West Coastal Unit and the Subdivisions Counter.

A portion of the Director's Interpretation language is attached, covering the general requirements and principals.

## GENERAL REQUIREMENTS AND PRINCIPLES

A summary of the Interpretation is as follows, comprised of language that applies generally to Venice Coastal Specific Plan.

1. Where provisions are silent in the Venice Coastal Specific Plan, regulations of the Los Angeles Municipal Code (LAMC) apply, including Section 12.22 C.27.
2. **PARKING:** Required parking for subdivision projects shall be based on the parking requirements pursuant to the Venice Coastal Specific Plan, 2 or 3 spaces (depending on subarea). Each new lot resulting from a small lot subdivision that contains one unit will fall under the “single family dwelling” category in the Specific Plan. For the purposes of parking calculations, small lot subdivisions shall be considered “less than 40 feet in width, or less than 35 feet in width if adjacent to an alley.” Where new lots resulting from a small lot subdivision include multiple units on a lot, they shall provide two and a quarter parking spaces for each dwelling unit, and shall provide Beach Impact Zone Parking, if applicable, pursuant to Section 13 E of the Specific Plan, consistent with multi-family parking requirements.
3. **DRIVEWAYS:** Pursuant to the Venice Coastal Specific Plan, all driveways and vehicular access shall be from alleys, when present. When projects abut an alley, each newly resulting subdivided lot shall be accessible from the alley and not the street. Exceptions may be made for existing structures where alley access is infeasible.
4. **SETBACKS:** Front, rear, and side yard setbacks abutting an area outside of the subdivision shall be consistent with the Specific Plan, where it sets limitations. This includes locations where new lots abut a lot that is not created pursuant to the Small Lot Subdivision Ordinance and not part of the project, or where the lots abut a waterway or street.
5. **MULTIPLE LOTS:** Existing lots may be subdivided into multiple small lots so long as the averaged newly resulting lot size is equivalent to the minimum requirement for “lot area per dwelling unit” established for each residential zone in the LAMC, pursuant to the Small Lot Subdivision Ordinance. For example, a 4500 square foot parcel in the RD1.5 zone may be subdivided into a maximum of 3 small lots with one measuring 1000 square feet, one measuring 1800 square feet and one measuring 1700 square feet, given that the average lot size is 1500 square feet.
6. **MULTIPLE UNITS:** Lots subdivided pursuant to the Small Lot Subdivision Ordinance shall be limited to one unit per resultant lot, unless the lot size is large enough to permit additional units based on the “lot area per dwelling unit” calculation established for each residential zone. In no case may a newly resulting lot contain more than three units. Generally, the combined density of the newly resulting lots shall not exceed the permitted density of the original lot, pre-subdivision. For Subareas that restrict density by limiting the number of units on a lot by a defined number, the resulting density from multiple lots may increase the originally permitted density on one original lot. Unit restrictions prescribed for Subareas shall still apply to individual resulting lots, but not over the entire pre-subdivided area; for instance subarea “(C) Silver Strand,” limits density to one unit per lot in the RD1.5 zones, and subarea “(D) Marina Peninsula” limits R3 lots to two dwelling units per lot.) As a general example, for Subareas in

which numbers of units per lot are not defined and restricted, a 4,500 square foot parcel in the RD1.5 zone may be subdivided into two small lots with one comprised of a single-family home and the other comprised of two residential units. This is possible since each unit averages 1,500 square feet of lot area. Resulting small lots cannot be further subdivided in the future, and cannot add future additional units.

7. AFFORDABLE REPLACEMENT UNITS: Projects in subarea “(F) North Venice,” and subarea “(G) Oakwood, Milwood, Southeast Venice,” that include demolition of Affordable Units (as determined by Los Angeles Housing Department—LAHD) are required to provide “Replacement Affordable Unit(s)” as defined in Section 5(T) of the Specific Plan when there are any units in excess of two units on newly resulting single lots. Lots subdivided pursuant to the Small Lot Subdivision Ordinance shall be permitted a density based on the “lot area per dwelling unit” calculation established for each residential zone. Affordable replacement unit requirements apply to multiple units on a single lot, and are not required if the density is spread over newly resulting lots so that no lot has an excess of two units. The requirement to replace an affordable unit will increase the number of units that would otherwise be permitted under the Small Lot Subdivision Ordinance only when the development includes three units on a lot. Mello Act requirements to replace affordable units still apply in all circumstances, and consistent with the Specific Plan, any affordable replacement units shall be replaced on the small lot subdivision project site.
8. DENSITY: Density shall not exceed the density permitted by zoning of the original lot, which is the “lot area per dwelling unit” restriction for each zone as determined by the Venice Coastal Specific Plan, or when not explicit in the Specific Plan, the Los Angeles Municipal Code.