

September 22, 2020

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Subject: **ADDENDUM - 6220 West Yucca Project Proposal – Comment Letter**  
**CPC-2014-4705-ZC-HD-DB-MCUP-CU-SPR**  
**ENV-2014-4706-EIR and VTT-73718**  
1756-1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765-1779  
North Vista Del Mar Avenue, Los Angeles, CA, 90028

Dear Planning Commissioners,

Please consider this letter as an addendum to our original comment letter dated September 20, 2020.

As the mom-and-pop income property owners directly abutting the project site on Vista Del Mar, we voiced our grave concerns in the original comment letter regarding the “mitigatable impacts” associated with Air Quality and Noise (Operation; Groundborne Vibration Structural Damage - Construction), and especially the significant and unavoidable impacts related to Noise (Construction; Groundborne Noise and Vibration Human Annoyance - Construction) with regards to our property.

The Final EIR, Statement of Override and Mitigation Measures and Monitoring Monitoring Program might be legally defensible, but imagine if you, honorable Planning Commissioners, had to live with the noise, dust, vibration, and traffic from such a neighboring construction project. In consultation with a land use attorney, we have been told there is no recourse given this situation, unless physical damage is done to the property, or conditions are imposed by a review authority. Imagine the impact of this 30-story development to our tenants’ lives as they live directly next door to this construction site for several years, if they even stay at all... Any considerations or conditions would be greatly appreciated.

Environmental concerns aside, our original comment letter focused on several items related to the Site Plan Review and was silent on the other discretionary applications. However, we would like to add comments regarding the proposed Zone Change and Density Bonus at this time.

The project requires a Zone Change and Height District Change from C4-2D-SN to (T)(Q)C2-2D-SN, from R4-2D to (T)(Q)C2-2D, and from [Q]R3-1XL to (T)(Q)R3-2D (for the three parcels, west to east respectively). The Planning Commission Staff Report failed to expand on the nuances of the zone change for the easterly lots fronting Vista Del Mar. The original project featured a three-story, 13-unit structure above a two-level semi-subterranean garage (Building 2), following the demolition of the existing residential buildings on these lots. The current Modified Alternative 2 project features the retention of these buildings: the residence at 1771 Vista Del Mar Avenue would remain as a single-family use and the residence at 1765 Vista Del Mar Avenue, which currently contains three residential units, will be converted back to a single-family use. One can only imagine that this was strategic, given the public outcry at the Advisory Agency meeting against the incompatible, overly massive Building 2 replacing two structures within the low-scale Don Carlos Historic District. However, the developer continues with the zone change, despite no proposed development of Building 2, in order to maximize the FAR and density for the proposal across the project site.

The Staff Report appears to focus on the fact that zone change request for the Center Parcel from R4-2D to C2-2D would make the zone consistent with the land use, as the R4 is not a corresponding zone in the Regional Center land use category, and that the Zone and Height District would be consistent with the Hollywood Redevelopment Plan. However, the entitlement findings for the Zone Change and Height District Change fail to substantiate in detail how the East Parcel's zone change is in conformity with the public necessity, convenience, general welfare and good zoning practice. The only reference to this parcel is factual:

"The East Parcel is zoned [Q] R3-1XL. The R3 zone permits a density of 800 square feet of lot area per dwelling unit. Height District 1XL limits building height to 30 feet with a maximum FAR of 3:1. The Q condition limits residential density to a maximum of one dwelling unit for each 1,200 square feet of lot area.

The Zone and Height District as proposed are consistent with and in substantial conformance with the intent and provisions of the General Plan as reflected in the adopted Community Plan." Page F-18

The East Parcel is not being redeveloped, and will actually have less density on-site than currently exists (four units existing, two proposed), per the proposal. It would seem that its rezoning is not necessary, except for the fact the rezoning increases the FAR of 3:1 to 6:1 and the density of 1/1,200 sf (per Q condition) to 1/800 sf. Is the development potential of the overall project legal grounds for making the rezoning findings for the East Parcel? The proposed rezoning would be inconsistent with the rest of the properties zoned [Q]R3-1XL along Vista Del Mar. Could this be considered spot zoning, contrary to objectives of the General Plan?

The rezoning questions lead to questions regarding the proposed Density Bonus. According to the table on A-4, the total number of units by right with the proposed zoning would be 212. The Entitlement Findings note that, "The Zone Change and Height District Change from C4-2D-SN to (T)(Q)C2-2D-SN, from R4-2D to (T)(Q)C2-2D, and from [Q]R3-1XL to (T)(Q)R3-2D would allow for the development of a new mixed-use building that includes 269 dwelling units, of which 8 percent (17 units) of the Project Site's applicable base density would be set aside for Very Low Income Households" (page F-16). The units retained on Vista Del Mar would bring the total to 271 for the project. The developer is the On-Menu Incentive to permit a ten percent increase in allowable floor area for 316,948 square feet of floor area, in lieu of the maximum 288,171 square feet otherwise permitted. This is contingent on the rezoning, and if it were not for the rezoning of the East Parcel (spot zoning?), the density bonus would not be as great.

Thank you for considering our comments.

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