



Alan Como <alan.como@lacity.org>

6220 Yucca, VTT-73718, CPC-2014-4705-ZC-HD-DB-MCUP-CU-SPR, Comments

cmaddren@gmail.com <cmaddren@gmail.com>

Tue, Aug 18, 2020 at 3:50 PM

To: alan.como@lacity.org

Cc: cmaddren@gmail.com

Dear Mr. Como,

I'd like to submit the attached comments on the [6220 Yucca](#) project, along with the accompanying LAPD COMPSTAT Report for 2016 as supporting data.

Please also add me to the distribution list for future communications regarding this project.

Also, could you please send a quick response to let me know you received this?

Thanks,

Casey Maddren

[2141 Cahuenga, Apt. 17](#)[Los Angeles, CA 90068](#)

2 attachments**6220 Yucca Comments Maddren 200818 FINAL.pdf**

446K

**LAPD Hlwd Stats 161231 for 6220 Yucca.pdf**

534K

August 18, 2020

Alan Como, AICP, City Planner
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

Re: 6220 Yucca Project
1760 Argyle, 6224 Yucca, 1779 Vista Del Mar
Case Nos.: VTT-73718, CPC-2014-4705-ZC-HD-DB-MCUP-CU-SPR
CEQA No.: ENV-2014-4706-EIR

Dear Mr. Como,

I would like to submit the following comments regarding the 6220 Yucca Project. As you receive public comment for this project, there are two key issues which must be addressed before approval is considered:

Housing

As the applicant proposes the demolition of 40 existing rent-stabilized units, the impact on the renter population in Hollywood is an important factor. The EIR discusses the proposal to make all newly constructed units rent-stabilized, which is certainly welcome. However, while proposals have been made to guarantee future housing for the tenants of the existing 40 units, I have not seen any evidence of a final agreement to ensure housing stability for them. It is important that the City insist on having a signed agreement between the tenants and the applicant before entitlements are granted. The Hollywood area has been a displacement hotspot over the last two decades. The tenants of the existing units must be protected.

Serious EIR Deficiencies

The following chapters of the EIR are seriously deficient:

Public Services, Police

Consistent with DCP's recent practice, crime data has been falsified to make it appear that crime in Hollywood is lower than it really is. See accompanying PDF with 2016 COMPSTAT report.

Utilities, Solid Waste

The data cited in the EIR is both incomplete and out of date, and hides the fact that the project, like all other recently approved projects, will violate AB 939.

Further details on these issues are provided below. The EIR should not be adopted until these two sections have been rewritten to provide accurate data and recirculated for public review.

Sincerely,
Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068

SPECIFIC EIR ISSUES

PUBLIC SERVICES, POLICE

The Citywide crime statistics provided in this section coincide with the numbers given in the December 31, 2016 COMPSTAT Report, but the Hollywood area statistics provided are grossly inaccurate and well below the numbers given in the December 31, 2016 COMPSTAT Report for the Hollywood Area.

The EIR states:

“Table IV.K.2-2, Hollywood Community Area Crime Statistics (2016), summarizes the crime statistics for the Hollywood Community Area from 2016 (the latest whole year for which annual crime data is available). As reported therein, the number of crimes in the Hollywood Community Area totaled 2,683, with most of the crimes related to personal/other theft.”

It also presents the following table:

TABLE IV.K.2-2
HOLLYWOOD COMMUNITY AREA CRIME STATISTICS (2016)A

Crime	Number	Percent of Hollywood Community Area Crime
Homicide	1	0%
Rape	38	1%
Robbery	253	9%
Aggravated Assault	278	11%
Burglary	282	11%
Motor Vehicle Theft	276	10%
Burglary From Motor Vehicle	722	27%
Personal/Other Theft	833	31%
Total	2,683	100%

First, the EIR claims that the total number of crimes reported in the Hollywood Area for the year 2016 was 2,683. This does not coincide with the 12/31/2016 COMPSTAT Report for Hollywood which gives a total of 5,830.

Second, the crime stats for the Hollywood Area given in the EIR are grossly inaccurate, and well below the actual numbers. To illustrate, let's look at the numbers reported in the 12/31/2016 COMPSTAT Hollywood Area Profile for violent crime only.

HOMICIDE	7
RAPE (121,122)	75
RAPE (815,820,821)	55
ROBBERY	552
AGGRAVATED ASSAULTS	579
TOTAL VIOLENT	1268

This should make clear that the numbers given in the EIR are completely false, and fail to give both the public and decision-makers an accurate picture of crime in Hollywood.

The EIR also states:

“As reported in Table IV.K.2-3, the Project's estimated net police service population of 740 persons plus the related projects' estimated police service population of 82,815 persons would together generate an increase of an estimated 83,555 persons within LAPD's Hollywood Community Plan Area. Based on a crime generation rate of 16 annual crimes per 1,000 residents (i.e., 0.016), the cumulative police service population of 83,555 persons could generate an additional 1,337 crimes,26 which would represent a 50 percent increase over existing conditions within the Hollywood Community Plan Area.”

This should make it clear to any rational person that the level of development proposed for the Hollywood Area will cause a huge increase in crime. But the EIR basically brushes this issue aside with the following statement:

“However, it is expected that the related projects (particularly those of a larger nature) would be subject to review by LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide onsite security, personnel and/or design features for their residents and patrons per standard development practices for the given uses. In addition, the Project vicinity and general Community Plan area are highly urbanized and it is assumed each of the related projects identified, as well as other future development within the Community Plan area would likewise be developed within an acceptable distance from one or more existing police stations.”

These responses are completely inadequate and do not comply with CEQA. The level of development proposed will certainly require new LAPD personnel, but due to the City’s present financial instability, where massive deficits are predicted in the years to come, it is highly unlikely that the LAPD will be able to significantly increase its presence in Hollywood. On-site security personnel will only address crime on-site, not in the larger community. There is no evidence provided to support the assumption that future projects will be sited within an acceptable distance from the Hollywood Division Police Station.

For these reasons the EIR chapter entitled Public Services, Police, must be rewritten and recirculated.

UTILITIES, SOLID WASTE

The EIR States:

“Using the calculation methodology adopted by the State of California, the City has achieved a landfill diversion rate of 76.4%.”

This is false. The City is nowhere near achieving a 76% rate of diversion to recycling. There is no evidence to support this statement. This figure seems to be taken from outdated data posted on the LASAN web site. Since China stopped accepting recyclables from foreign countries, the City of LA, like the rest of California, has been facing a growing recycling crisis. The project will be served by RecycLA. Contracts with the companies the City relies on to implement RecycLA have been revised to reflect a new goal of 35% diversion to recycling by 2023. This means that the project is in violation of AB 939, the State law which requires that all California municipalities divert at least 50% of solid waste to recycling.

The EIR includes extensive information on waste disposal in LA County, but to comply with CEQA it needs to provide accurate, recent data on solid waste production and diversion to recycling in the City of LA. There is no way the public or decision-makers can assess the project’s impacts without current data.

For these reasons, the EIR chapter entitled Utilities, Solid Waste needs to be rewritten and recirculated before adoption.




COMPSTAT

Hollywood Area Profile

12/04/16 - 12/31/16



	AREA	
	COMMANDING OFFICER:	Cory S. Palka
	Rank:	CAPT-III
	Date of Rank:	August 10, 2014
	Date Assigned Area:	March 6, 2016
	PATROL DIVISION	
	COMMANDING OFFICER:	Armand A. Carranza
	Rank:	CAPT-I
	Date of Rank:	March 8, 2015
	Date Assigned Area:	June 7, 2015
	LAPD Appointment Date:	November 5, 1990

CRIME STATISTICS for week ending 12/31/16												
VIOLENT CRIMES	12/04/16 TO 12/31/16	11/06/16 TO 12/03/16	% Change	11/06/16 TO 12/03/16	10/09/16 TO 11/05/16	% Change	YTD 2016	YTD 2015	% Change	YTD 2016	YTD 2014	% Change
HOMICIDE	0	0	N.C.*	0	2	-100.0%	7	8	-12.5%	7	7	0.0%
RAPE (121,122)	4	5	-20.0%	5	7	-28.6%	75	83	-9.6%	75	93	-19.4%
RAPE (815,820,821)	3	6	-50.0%	6	4	50.0%	55	60	-8.3%	55	27	103.7%
TOTAL RAPE	7	11	-36.4%	11	11	0.0%	130	143	-9.1%	130	120	8.3%
ROBBERY	40	47	-14.9%	47	46	2.2%	552	437	26.3%	552	374	47.6%
AGGRAVATED ASSAULTS	36	33	9.1%	33	49	-32.7%	579	606	-4.5%	579	417	38.8%
TOTAL VIOLENT	83	91	-8.8%	91	108	-15.7%	1268	1194	6.2%	1268	918	38.1%

PROPERTY CRIMES	12/04/16 TO 12/31/16	11/06/16 TO 12/03/16	% Change	11/06/16 TO 12/03/16	10/09/16 TO 11/05/16	% Change	YTD 2016	YTD 2015	% Change	YTD 2016	YTD 2014	% Change
BURGLARY	47	29	62.1%	29	37	-21.6%	573	539	6.3%	573	506	13.2%
MOTOR VEHICLE THEFT	58	63	-7.9%	63	64	-1.6%	643	556	15.6%	643	434	48.2%
BTFV	99	115	-13.9%	115	130	-11.5%	1549	1407	10.1%	1549	1113	39.2%
PERSONAL/OTHER THEFT	120	129	-7.0%	129	111	16.2%	1797	1838	-2.2%	1797	1648	9.0%
TOTAL PROPERTY	324	336	-3.6%	336	342	-1.8%	4562	4340	5.1%	4562	3701	23.3%
TOTAL PART I	407	427	-4.7%	427	450	-5.1%	5830	5534	5.3%	5830	4619	26.2%

Child/Spousal Abuse (Part I & II)*	44	48	-8.3%	48	53	-9.4%	546	454	20.3%	546	472	15.7%
SHOTS FIRED	2	2	0.0%	2	3	-33.3%	42	33	27.3%	42	37	13.5%
SHOOTING VICTIMS	1	3	-66.7%	3	4	-25.0%	24	15	60.0%	24	12	100.0%

ARREST STATISTICS for week ending 12/31/16												
ARRESTS	12/04/16 TO 12/31/16	11/06/16 TO 12/03/16	% Change	11/06/16 TO 12/03/16	10/09/16 TO 11/05/16	% Change	YTD 2016	YTD 2015	% Change	YTD 2016	YTD 2014	% Change
HOMICIDE	0	0	N.C.*	0	1	-100.0%	7	9	-22.2%	7	6	16.7%
RAPE	2	1	100.0%	1	1	0.0%	23	18	27.8%	23	19	21.1%
ROBBERY	15	7	114.3%	7	11	-36.4%	152	176	-13.6%	152	111	36.9%
AGGRAVATED ASSAULT**	36	28	28.6%	28	48	-41.7%	495	479	3.3%	495	419	18.1%
BURGLARY	6	5	20.0%	5	6	-16.7%	110	119	-7.6%	110	105	4.8%
LARCENY	18	18	0.0%	18	13	38.5%	311	376	-17.3%	311	358	-13.1%
MOTOR VEHICLE THEFT	13	13	0.0%	13	25	-48.0%	156	104	50.0%	156	66	136.4%
TOTAL VIOLENT	53	36	47.2%	36	61	-41.0%	677	682	-0.7%	677	555	22.0%
TOTAL PART I	90	72	25.0%	72	105	-31.4%	1254	1281	-2.1%	1254	1084	15.7%
TOTAL ALL ARRESTS	497	466	6.7%	466	683	-31.8%	9994	12572	-20.5%	9994	12660	-21.1%

*Part II Child/Spousal Abuse Simple Assaults not included in Part I Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.

**Statistics include domestic violence.

N.C. - Not Calculable

Statistics are based on the date the crime or arrest occurred.