

16-0104

THE LAW OFFICE OF  
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June 16, 2016

**VIA OVERNIGHT MAIL**

Los Angeles City Council, PLUM Committee  
Los Angeles City Hall  
c/o City Clerk, Attn: Ms. Sharon Dickinson  
200 North Spring Street, Room 395  
Los Angeles, CA 90012

PLUM Chairman Hon. Jose Huizar, Vice Chair Hon. Marqueece Harris-Dawson,  
Hon. Mitchell Englander, Hon. Felipe Fuentes, Hon. Gilbert Cedillo

Re: Council File No. 16-0104/VTM No. 72367-SL/ENV -2013-1998-MND  
2925 W. Waverly Drive, Los Angeles, 90046 ("Waverly")

This office represents Rubgi LLC, the applicant on the above filing. We  
respectfully respect that the PLUM Committee recommend denial of the appeal .

**Advisory Agency Approved Case/CAPC Denied Appeal**

1. The Advisory Agency approved the map's filing.
2. The Central Area Planning Commission unanimously denied the appeal.
3. The five-lot small lot subdivision fully conforms with the Small Lot Ordinance LAMC §12.22.C. 27. and the applicable City Design Guidelines.
4. Based upon community input, the applicant modified its plans--there are no variances, Zoning Administrator Adjustments or Determinations sought.

**Appellant's Arguments are Conclusionary--Lacking Facts and Substance**

1. Claim: The filing is not consistent with the Hollywood Community Plan.  
Response: The Plan was adopted in 1998, therefore the 2005-adopted Small Lot Ordinance was not in the Plan. Waverly is consistent with the Plan's density and zoning.
2. Claim: Filing is not consistent with area's, "character, design and circulation."  
Response: The neighborhood is mix of residential uses; single family, multi-family and small lot developments. Waverly's five small lot homes will be less expensive than traditional single family homes.

3. Claim: The site is not suitable for its proposed density

Response: The existing RD-1.5 zone permits 10 dwelling units. The adjacent property to the west is a 54 unit, three story condominium built over a garage.

4. Claim: The site contains Historic Resources.

Response: On February 6, 2014 the City's Cultural Heritage Commission unanimously voted to reject the appellant's "Historic Resource" claim that the existing single family residence was a Historic-Cultural Monument.

5. Claim: The MND is inappropriate to address the environmental issues.

Response: The California Environmental Quality Act (CEQA) mandates an EIR only when there is, "substantial evidence supporting a fair argument that the proposed project may produce significant environmental effects." California Public Resources Code §§21080(d), 21082.2; CEQA Guidelines §15064(f)(1). The Appellant has failed to cite any specific fact that support its allegation of "substantial evidence ."

6. Claim: The MND fails to address the environmental impacts.

Response: The MND was revised with supplemental environmental analysis as an Addendum to the MND. None of the environmental conclusions were changed from the City-approved MND. The only letter from the public was from SCAQMD which cited an advisory recommendation regarding residences being within 500' of the freeway. This does not apply to Waverly since the nearest residence is approximately 125' from the property line, and well in excess of 500' from the freeway.

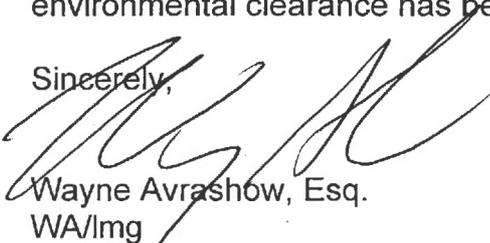
#### **An Extensive Community Outreach Yielded Community-Based Modifications**

My clients met numerous times with the Silver Lake Neighborhood Council and community stakeholders. In response, my client withdrew its request for ZAAs, reduced the density (by-right in the RD-1.5 zone 10 multi-family units could be built); and eliminated its roof top deck to appease the appellant's privacy concern. Five letters of support from the community are attached.

#### **Respectfully Urge Denial of the Appeal**

Waverly is in strict adherence with the Small Lot Subdivision and the environmental clearance has been adequately addressed in the MND and its Addendum.

Sincerely,



Wayne Avrashov, Esq.

WA/lmg

cc: Los Angeles City Councilman David Ryu, Attn: Ms. Julia Duncan  
Client

**District 4 Councilman David Ryu**  
200 N Spring St, Room 425  
Los Angeles 90012

Re: 2925 Waverly Dr, Silver Lake CA 90049

Attn: David Ryu

I am writing in support of the proposed project at 2925 Waverly Drive.

I have been a Silver Lake resident for the last four years. I love everything about this neighborhood and don't want to be priced out of it. My wife and I are currently looking to buy property in Silver Lake and though the property market in Los Angeles in general is inflated I feel like there are few options in Silver Lake besides 1-2 million dollar warn down bungalows.

I think that as a community we need to embrace new housing and quality urban development. There needs to be more variety to reflect the mix of people in the community. I support the project at 2925 Waverly Drive for these reasons.

Regards

A handwritten signature in black ink, appearing to read "Marc Hendrick", is written over a vertical line that extends downwards from the end of the signature.

Marc Hendrick  
3114 Scotland St #1  
Los Angeles CA 90039

City of Los Angeles  
Office of Councilmember David Ryu - District 4  
200 N Spring St Room 425  
Los Angeles CA 90012

February 16, 2016

**Re: 2925 Waverly Drive Project**

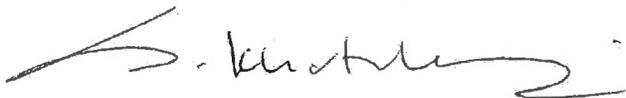
I write this letter in support of the above mentioned project. As a property owner in this district I support new and thoughtful housing projects that bring diversity into our neighborhoods and help resolve the dire housing shortage we are currently facing. The Mayor's own objective is the increase of the housing supply to ease the pressure on the high costs of housing and additional rental stock. Good projects, including Small Lot Subdivision projects, allow a creative way to bring this needed housing stock on line within the current density guidelines.

The proposed 5 unit Small Lot Subdivision project, located at 2925 Waverly Drive, is attractively planned and the units are nicely designed. This portion of Waverly Drive is zoned for multifamily housing and having a thoughtful 5 unit Small Lot Subdivision is by far preferable to an apartment or a condominium building.

I believe this project will have a positive impact on the neighborhood and I strongly support it.

Regards,

Serko Khatchadourian  
Co-Owner 2901 Waverly Drive



District 4 – Councilman Ryu Office  
200 N Spring St, Room 425  
Los Angeles 90012

I am writing in support of the project at 2925 Waverly Drive. As a young resident and property owner in Silver Lake, having purchased my home in 2009, I experienced the difficulty in finding a house that I could afford which also met the needs for my growing family. I feel fortunate to have found affordable property when we did and sympathize for young families wanting to buy now as prices keep growing out of reach.

I support this project at 2925 Waverly Drive, as it's a nicer and newer form of housing. It poses a much better option than condos and, frankly, it will be more affordable than any of the new houses to come on the market which are either mostly flipped or old renovated estates which can pose many issues to maintain.

Thank you,

*Zachary Goldstein*

Zachary Goldstein  
1312 North Occidental Blvd  
Los Angeles CA 90026

District 4 Council Office, Los Angeles  
February 11<sup>th</sup> 2016  
Councilman David Ryu

**2925 Waverly Dr, Silver Lake**

I am writing in support of this project.

I have lived in Silver Lake for 4 years and would not live anywhere else. I appreciate everything that our community has to offer including its unique and interesting architecture and design.

I support this and other well-designed and thoughtful projects (many of which exist in our great neighborhood) as they create meaningful options for home ownership outside of large (often unsightly) condo blocks and apartment buildings.

New single-family homes are becoming rare in our community due to the age and character of our housing. It is also often out of reach for many to think of buying an older home and then renovating or rebuilding at a huge expense. We need great new housing options for a variety of people that encourage home ownership.

We live in a great community and I strongly believe that we should support good design and additions to our community that allow for new homeowners to contribute to our great neighborhood.

Thank you,



Brienne Emery  
1605 Redesdale Ave  
Los Angeles, CA 90026

District 4 Councilman David Ryu  
200 N Spring St, Room 425  
Los Angeles 90012

Re: 2925 Waverly Dr, Silver Lake CA 90049

I am writing in support of the project mentioned at the above address.

I am a Silver Lake resident and love this neighborhood, its vibrancy and its community. I am concerned about how expensive housing has become in our neighborhood. My partner and I have great jobs, make decent money and still find it a struggle to purchase in our community. I am also concerned about the ageing stock of our housing. Its comforting to think that new modern options are available in close proximity to services and amenities.

I support these projects as we need more NEW quality housing that is well designed and not outrageously expensive, not everyone wants or is able to live in a craftsman bungalow for \$2m. Silver Lake is an eclectic mix of people, housing, culture and age-groups. Good urban development and new housing should be encouraged. I would hate to have to leave my neighborhood being priced out.

Thank you for your time,

Anna Burns  
1680 Griffith Park Blvd  
#6  
Los Angeles, CA 90026  
annaeb@gmail.com