

Members of the Los Angeles City Council
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012

February 24, 2019

Re: OPPOSE 6421 Selma Wilcox Hotel
Item 1, Council Agenda for Tuesday, February 26, 2019
Case No.: CPC-2016-2601-VZC-HD-CUB-ZAA-SPR, ENV-2016-2602-MND
6421-6429 1/2 W. Selma Ave., 1600-1604 N. Wilcox Ave.
Council File No.: 18-0873

Dear Members of the City Council,

I am writing to oppose the adoption of the MND (No. ENV-2016-2602-MND), and the findings of the Los Angeles City Planning Commission (CPC) for the project located at 6421-6429 1/2 W. Selma Ave., 1600-1604 N. Wilcox Ave. (6421 Selma Wilcox Hotel). I am also writing to oppose the multiple approvals required for this project. The CPC and the Planning & Land Use Management Committee ignored substantial evidence in the record which:

1. Contradicts assertions made by the developer,
2. Shows that the MND is seriously flawed in numerous respects, and
3. Demonstrates that in some cases the findings adopted for this project are not based on a rational evaluation of the actual facts.

The approval of this 8-story hotel, which offers alcohol service and live entertainment, will have numerous negative impacts on the Hollywood area, where I live. The community is already impacted by oversaturation of alcohol, high crime rates, understaffed law enforcement, stressed emergency services, and excessive noise from entertainment venues. The City Planning Commission abused its discretion by failing to consider substantial evidence in the record pertaining to the hotel's negative impacts. The Department of City Planning failed to investigate credible reports that, as far back as 2014, 6421 Selma was planned as the second phase of a two part project. Commissioners ignored evidence that the developer was engaged in piecemealing.

1. Piecemealing/Failure to Disclose True Scope of Project

In 2015 the developer applied to build a project that at that time was called Tao Restaurant and Retail Project, ENV No. ENV-2015-2672-MND. The environmental assessment describes the project as restaurant and retail space with three levels of

parking. The LLC the developer used to file the application was called "6421 Selma Wilcox Hotel LLC". After the original project had been approved and construction begun, Hollywood International Regional Center/Relevant/6421 Selma Wilcox Hotel LLC filed an application for a different project, an 8-story hotel with a rooftop bar/lounge featuring live entertainment. The name had been changed to Selma Wilcox Hotel Project.

In the course of processing this project, area residents communicated to the DCP that back in 2014 Space Global, a company that partnered with HIRC to raise funding for new hotels, had published an on-line brochure describing a hotel complex on Selma between Cahuenga and Wilcox which included the Dream 1, Dream 2 (Selma Wilcox Hotel), Tao, and Beauty & Essex. The brochure describes the Dream 2/Selma Wilcox Hotel as the second phase of the project, referring to it as a "\$43 million extension" of the first hotel.

Though it originally seemed that HIRC had used the restaurant/retail project as a placeholder to start construction of the hotel, it now seems clear that as far back as 2014 the developer intended to build a complex which included the Dream 1, the Dream 2, Tao, and Beauty & Essex.

2. CUB Approval/Failure to Consider Substantial Evidence in the Record

In the DCP's letter dated March 18, 2016 regarding approval of associated case no. ZA-2015-2671-CUB, it states that there are 54 on-site ABC locations in this census tract, which indicates the area is already oversaturated. It goes on to say that within a 1,000 ft. radius of the project there are 30 Type 47 ABC locations and 10 Type 48. The same letter also states that Crime Reporting District No. 646 reported 1,870 crimes in 2014, over 10 times the citywide average of 163. Research shows that alcohol density is associated with increased incidence of violent crime.

Central Hollywood's recent history seems to bear out researchers' findings that alcohol density is related to violent crime. In October 2014 Chief Beck wrote to the DCP, saying that the Hollywood area was already "oversaturated" with ABC locations, and asking that the DCP exercise more restraint in granting liquor permits. The DCP ignored his request, granting a mounting number of permits.

Since Chief Beck wrote his letter, the number of violent crimes reported by the Hollywood Division has gone from 918 in 2014 to 1,424 in 2018, well over a 50% increase.

The DCP has failed to rationally evaluate the import of statistics cited by the agency itself, research from multiple institutions regarding the association between alcohol density and crime, a letter from the Chief of the LAPD, and the impact of the steep increase in violent crime in Hollywood over the past four years.

3. Noise/Ongoing Complaints Related to Adjacent Project by Same Developer

The assurances that live entertainment on the rooftop deck will not be audible because it will take place in an enclosed area are not credible. Loud music disrupting residents' rest during early morning hours has been an ongoing problem in Hollywood. It has especially been a problem at the Dream Hotel, another project, adjacent to this one, built by the same developer. When the Dream Hotel was constructed, the Hollywood community was told that mitigation measures would prevent any disruptions due to loud music. Clearly these assurances were worthless. The evaluation included in the MND offers thousands of words of boilerplate language, but these words are meaningless when we take into account that the developers have shown themselves not to be trustworthy.

4. Parking

At the CPC hearing Commissioners engaged with the developer in a discussion of locations for off-site parking in which the developer's representative indicated that nearby HIRC projects could accommodate parking for visitors at 6421 Selma. This seems to indicate that 6421 Selma was planned in conjunction with nearby hotels, but these hotels have not been assessed as a unified project, and at the time they were approved the developer did not indicate that they were designed to contain excess parking for future projects.

For the reasons given above, the City Council must refuse to adopt the MND and must reject the approval of this project.

I also hereby adopt and incorporate by reference all arguments made by appellants related to the proposed project at 6421-6429 1/2 W. Selma Ave., 1600-1604 N. Wilcox Ave., case number CPC-2016-2601-VZC-HD-CUB-ZAA-SPR.

Thank you for your time.

Sincerely,
Casey Maddren
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