

Communication from Public

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Comments for Public Posting: Please see attached.



April 18, 2022

VIA EMAIL & ONLINE: (<https://cityclerk.lacity.org/publiccomment/>)

Planning and Land Use Management Committee, City of Los Angeles
c/o Candy Rosales, Legislative Assistant (clerk.plumcommittee@lacity.org)

**RE: Item 20, PLUM Meeting Scheduled April 18, 2023 (Council File No. 21-1404);
Dream Hotel (DCP Case Nos. ZA-2013-3504-ZV-PA1, ENV-2018-7559-CE)**

Dear Chair Harris-Dawson and Honorable Councilmembers:

Appellant UNITE HERE Local 11 (“**Local 11**”) respectfully provides the following comments to the City of Los Angeles (“**City**”) Planning and Land Use Management Committee (“**PLUM**”) regarding Local 11’s appeal (“**Appeal**”) of the proposed after-the-fact approval for the Dream Hollywood (“**Hotel**”), located at 6415-6419 West Selma Avenue in Hollywood (“**Site**”), allowing zero onsite parking, permitting parking at one of Relevant Group’s other nearby hotels, and authorizing an additional 14,000-plus square feet for Hotel-related uses that was originally approved for parking (“**Project**”).

The Hotel was originally approved in 2014 with the explicit condition to provide “77 on-site parking spaces” located on the 1st and 2nd floor.¹ Rather than building those parking spaces, the Hotel purposely converted these floors to non-parking uses and started operations in 2016,² which seems to be a violation of its conditions of approval and local law. (See Los Angeles Municipal Code [“**LAMC**” or “**Code**”] § 12.29.) Since then, Relevant Group has proceeded to entitle and build multiple hotel/entertainment venues adjacent to and near the Site (though some may have recently changed ownership). (See image below.³) For years, Local 11, fellow appellant Citizens for a Better Los Angeles (“**CBLA**”), and other members of the public warned the City that these individual projects were inter-related and needed to be analyzed collectively under the California Environmental Quality Act (“**CEQA**”).⁴

¹ Letter of Determination (4/4/14) DCP Case no. ZA-2013-3504, p. 7, <https://planning.lacity.org/pdiscaseinfo/document/MTI1OTIy0/de98c26c-073f-43dc-b739-b418741a3276/pdd>; Dream Hotel (stamped 7/7/14) Sheet G023, <https://planning.lacity.org/pdiscaseinfo/document/MTM3NDE10/de98c26c-073f-43dc-b739-b418741a3276/pdd>.

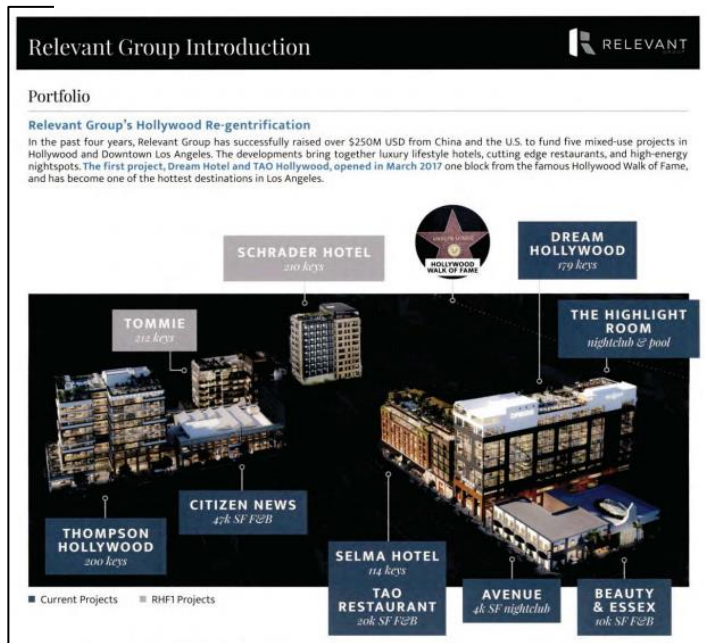
² Building & Safety, 6417 W. Selma Ave 90028, Permit 13010-10007-03647, <https://www.ladbsservice2.lacity.org/OnlineServices/PermitReport/PcisPermitDetail?id1=13010&id2=10007&id3=03647>.

³ See e.g., Relevant Group (2019) Portfolio, <http://www.relevantgroup.com/projects/>; Relevant Group (Apr. 2018) Relevant Hospitality Fund 1, pp. 13, https://www.relevantgroup.com/wp-content/uploads/2020/07/RHF1_CONFIDENTIAL_4.11.18-1.pdf; statement from Relevant Group representatives during 2017 Hollywood Economic Summit held in June 2017, <https://www.youtube.com/watch?v=oVF6kifY0lg>.

⁴ See e.g., Local 11 Appeal (10/14/21), https://clkrep.lacity.org/onlinedocs/2021/21-1404_misc_1_11-23-21.pdf; CBLA Appeal (10/12/21) https://clkrep.lacity.org/onlinedocs/2021/21-1404_misc_11-23-21.pdf; CBLA Letter (4/12/23), https://clkrep.lacity.org/onlinedocs/2021/21-1404_PC_PM_04-12-2023.pdf; United Neighborhoods for Los Angeles (1/14/19) Comment Letter, PDF pp. 1-11 (requesting local, state, and federal investigation into the City’s piecemeal approval of the Applicant’s multiple projects), http://clkrep.lacity.org/onlinedocs/2018/18-0873_pc_1-14-19.pdf; Mitchell Tsai (9/6/18) Comment Letter, PDF pp. 18-308 (detailing the common ownership and/or control of Applicant’s nine projects), http://clkrep.lacity.org/onlinedocs/2018/18-0873_pc_1-14-19.pdf; Casey Maddren (8/31/18) Appeal, PDF pp. 3-4, 6-7, http://clkrep.lacity.org/onlinedocs/2018/18-0873_misc_1_09-

Now, relying on a Categorical Exemption (“CE”), applicant is seeking an after-the-fact approval to allow zero onsite parking, permit Hotel parking at one of Relevant Group’s other nearby hotels (at least at the time of the request), and authorize non-parking hotel uses on the additional 14,000-plus square feet that were originally set aside for parking. It appears that the Dream Hotel is operationally dependent for parking on these other nearby hotels.

Figure 1: Older Image from Relevant Group Website



The City should not turn a blind eye and bless the proposed after-the-fact parking deviations, the apparent violation of conditions of approval, and piecemeal environmental review.

Nor should such behavior be condoned by allowing the Dream Hotel. This is a bad precedent to set. At a minimum, the cumulative impacts of the Dream Hotel and related projects have not been adequately analyzed, which mean that use of a Categorical Exemption for the Project is not appropriate.

Hence, Local 11 respectfully requests PLUM to (i) grant the Appeal, (ii) withhold the Project entitlements (i.e., permitting the parking deviations) until a CEQA-compliant environmental review has been conducted, or otherwise (iii) proceed with an enforcement action requiring the Hotel to provide onsite parking consistent with its original conditions of approval. Applicant’s whole request should be denied.

Local 11’s Appeal incorporates by this reference all comments submitted by any commenting party into its Appeal, and reserves the right to supplement these comments at future hearings. We thank you for your consideration of these comments.

Sincerely,

Ada F. Briceño
Co-President
UNITE HERE Local 11