

Communication from Public

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Council File No: 21-1404
Comments for Public Posting: Citizens for a Better Los Angeles submits the attached summary of issues in support of its appeal re modifications to the Dream Hotel, 6417 Selma, ENV-2018-7559-CE, Council File: 21-1404.



Citizens for a Better Los Angeles

May 29, 2026

Planning & Land Use Management Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: 6417 Selma Appeal, ENV-2018-7559-CE
ZA-2013-3504-ZV-PA1-1A
Summary of CBLA's Arguments in Support of Appeal

Members of the Planning & Land Use Management Committee,

Citizens for a Better Los Angeles submits the following summary of our arguments in support of the appeal referenced above. We offer this overview to give committee members a concise statement of our arguments, and we have included links to supporting documents that were previously filed in the course of this appeal.

1. The Project is not exempt from CEQA pursuant to CEQA Guidelines, Section 15301, Class 1, because it results in the addition of over 10,000 square feet and involves a significant change of use, from parking structure to hotel lobby.
2. An exception under Section 15300.2 of the CEQA Guidelines does apply with regard to cumulative impacts. There is substantial evidence in the record showing that this project is just the latest in a series of piecemealed approvals related to Relevant Group's larger hotel/nightlife complex.
3. The 2019 environmental documents submitted by the applicant are incomplete and inaccurate. They do not satisfy the requirements of CEQA.
4. The required findings cannot be made to support this plan approval/zone variance. The findings are not supported by the evidence, and the decisionmaker has not proceeded in the manner required by law.
5. The plan approval/zone variance is an illegal, after-the-fact approval of a significant modification to the approved project, as defined in the September 17, 2008 and April 4, 2014 determination letters.
6. The project does not include the 64 bicycle parking spaces specified in the February 26, 2021 determination letter, page 8. There is no bicycle parking on-site.
7. The project appears to violate LAMC C.1.(b), since there is no evidence that the

owner has provided LADBS with an approved lease for off-site parking. LAMC requires off-site lease information to be noted on COO, but the most recent COO does not appear to include this notation.

8. The project violates LAMC 12.26 G.3.(b) because required employee carpool/vanpool parking does not exist. The project also violates LAMC Sec. 12.21. C.6.(a), which states that a loading space is required for hotel uses.

Below we provide additional background on some of the points listed above.

The Project Is Not Exempt from CEQA

The Project is not exempt from CEQA pursuant to CEQA Guidelines, Section 15301, Class 1, because it results in the addition of over 10,000 square feet. Incredibly, the ZA's September 30, 2021 determination letter bases the exemption on the fact that he dismissed the request to add approximately 14,000 square feet to the project, even though the additional square footage had already been added.

An Exception under Section 15300.2 of the CEQA Guidelines Does Apply

An exception under Section 15300.2 of the CEQA Guidelines does apply with regard to cumulative impacts. There is substantial evidence in the record showing that this project is just the latest in a series of piecemealed approvals related to Relevant Group's larger hotel/nightlife complex. See CBLA's 2/22/22 comments: Exhibit D, Map of Relevant Projects; Exhibit E, List of Relevant Entities; Exhibits F & G, Projects Operated by Relevant Subsidiary Ten Five Hospitality.

6417 Selma Additional Comments from CBLA, 2/22/22

<https://drive.google.com/file/d/1adM12hoNnGirJUcEYZsL65zXvWZWWiJs/view>

The 2019 Supplemental Environmental Documents Do Not Satisfy CEQA's Requirements

The environmental documents submitted by the applicant, including: 1) 2019 Traffic Study from Overland Consultants; 2) 2019 Noise Monitoring Study from Parker; and 3) 2019 CalEEMod Air Quality Modeling Worksheets, are incomplete and inaccurate. They do not accurately represent the operational impacts of the hotel and their assumptions are largely incorrect. They do not satisfy the requirements of CEQA.

Employee Carpool/Vanpool Parking Can't Be Moved Off Site

The ZA's February 26, 2021 determination letter violates LAMC by approving the removal of all on-site parking, without addressing the fact that LAMC 12.26 G.3.(b) requires that employee carpool/vanpool parking be provided on the project site. This 2021 determination also ignores the September 17, 2008 determination letter's Conditions of Approval, A.9, TDM Measures, which specifies required employee carpool/vanpool parking on-site.

Based on the above, we ask the PLUM Committee to grant CBLA's appeal. Thank you for your time.

Casey Maddren
Citizens for a Better Los Angeles