

Communication from Public

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Comments for Public Posting: CBLA submits the attached reply to LA City Planning's June 4, 2026 comments in response to the appeal.

June 5, 2026

To:
Members of the PLUM Committee

From:
Citizens for a Better Los Angeles

Re:
6417 Selma Modifications, ENV-2018-7559-CE, ZA-2013-3504-ZV-PA1-1A
Council File: 21-1404
Reply to June 4, 2026 Response to Appeal from LA City Planning

Members of the PLUM Committee,

We have reviewed LA City Planning's June 4, 2026 response to the appeal, and we must say we are baffled by staff's comments.

LA City Planning appears to see this matter as a theoretical discussion that has no real world impacts on the community, and one that can go on indefinitely without resolution.

We would like to state again that the developer, Relevant, has repeatedly violated the law over the last several years and the the City of LA has made no meaningful effort to enforce existing laws or to hold Relevant accountable. Relevant illegally converted two levels of approved parking to additional space for its lobby, storage, utility rooms, etc., and Relevant illegally moved 77 parking spaces off-site. In addition, because of the approved removal of the banquet facility and the addition of more than 60 hotel rooms, and the transformation of the rooftop into a nightclub, the existing project is substantially different from the project analyzed in the 2008 MND. These changes have caused increased impacts with regard to air quality, GHG emissions, noise, traffic and parking.

Below are CBLA's replies to specific points in the response from LA City Planning.

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In discussing City Planning's 2021 decision to dismiss the request for the addition of 14,000 additional square feet, the letter states:

The action to dismiss does not negate the applicant's responsibility to pursue more appropriate entitlement requests to consider the additional square-footage resulting from the conversion of the parking area into other uses. Until an entitlement is granted to allow for the additional squarefootage, the applicant is prohibited from utilizing the space at issue for any other unapproved use. [Emphasis added.]

This statement seems to indicate that City Planning has no grasp of the reality of the situation. The author states that the applicant has the responsibility to "pursue more appropriate entitlement requests to consider the additional square-footage". When is that going to happen?

The hotel has been operating illegally for almost a decade, and the situation is still not resolved. The author also does not seem to grasp that the approval of removing the parking to an off-site location is directly tied to the increase in square footage. The increase in square footage has already occurred as a result of the developer's illegal actions. The author also states, "Until an entitlement is granted to allow for the additional square footage, the applicant is prohibited from utilizing the space at issue for any other unapproved use." This would seem to indicate that the developer and/or current owner are prohibited from using the ground floor for lobby, storage, utility rooms, etc., but the City has never enforced that prohibition.

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The letter states:

The loss of parking is not a significant impact under CEQA in and of itself, and would need to cause a secondary impact that is analyzed under CEQA.

CBLA has repeatedly stated that, in addition to the removal of parking to an off-site location, neither the required employee carpool/vanpool spaces nor the 64 required bicycle parking spaces were included in the hotel. These were legally required components intended to reduce vehicle trips, mitigate emissions and avoid increased congestion. Without the inclusion of these components, it's clear that the project's impacts are greater than the initial analysis found.

We are grateful for City Planning's inclusion of the following:

It should be noted that at any time, the applicant may choose to permanently relocate those parking spaces off-site in conformance with the provisions of LAMC Sec. 12.21-A.4.(g) (not more than 750 feet distant therefrom) and LAMC Sec. 12.26-C.5 (recording of a covenant and agreement to maintain said parking spaces so long as the building or use they are intended to serve is maintained) without discretionary approval.

We thank City Planning for the reminder that a covenant is required for the removal of parking to an off-site location. However, we believe it is extremely unlikely that anyone will be able to find a feasible off-site location for 77 spaces within 750 feet of the hotel. Parking for residents and businesses in the area is extremely limited.

The letter goes on to state:

The issues concerning segmenting the environmental analysis are without merit because the subject hotel building had been completed and was in operation, while the other buildings were nearing completion.

We have a hard time believing that City Planning considers this a serious argument. It seems to be asserting that for segmenting/piecemealing to occur, all three projects would have to be in operation at the same time. There are many examples of multi-phase projects where developers piecemeal approvals over time to avoid triggering required CEQA review.

The approval presently under consideration did not allow a change of use, resulting in additional square-footage, as consideration of that request was found to be beyond the

authority of the LAMC Sec. 12.27-U (approval of plans) action requested.

Again, the author appears unwilling to recognize that the removal of parking is tied to the increase in square footage and the change of use. If no change of use was approved, then when does the City intend to enforce the prohibition against illegal uses?

There is also no evidence to support that any of these alleged piecemealed projects will rely on or provide parking to the project.

Based on the above and as provided otherwise in the record, there is no evidence to support that these projects are part of one project.

On the contrary, there is substantial evidence in the record, including in the 2021 determination letter which is being appealed. The 2021 determination specifically states that the two sites being considered for the 77 off-site spaces are the Thompson Hotel (1541 Wilcox) and the tommie hotel (6516 Selma). The Dream, the Thompson and the tommie were all built by Relevant, and at the time the determination was issued they were all owned by Relevant.

OTHER ARGUMENTS

The provision of required bicycle parking and electric vehicle charging stations are matters of enforcement by the Department of Building and Safety and are not appropriate for consideration in this appeal.

CBLA would like to point out that complaints have been filed with LADBS both for the failure to build required parking and for the failure to install required bicycle parking spaces. LADBS has taken no action on either of these complaints.

In general, CBLA would like to point out that the current appeal is the result of the City of LA's ongoing failure to enforce the law and hold the applicant responsible. In violation of the conditions of the approved project, Relevant chose not to build required on site vehicle parking. The City has taken no enforcement action. Relevant also chose not to build required employee carpool/vanpool parking and bike parking. The City has taken no enforcement action. The existing project is substantially different from what was initially approved, but the City has not modified the CUB's conditions of approval. The original owner operated the rooftop deck as an illegal nightclub, blasting music after midnight, loud enough that it could be heard half a mile away. The City has taken no meaningful enforcement action.