

March 22, 2019

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By:

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Holly Wolcott, City Clerk
Office of the City Clerk
200 N. Spring St.
City Hall, Room 360
Los Angeles, CA 90012

Re: Notice of Intent to Sue City of L.A. Re Approvals for
Selma Wilcox Hotel
6421 - 6429 1/2 W. Selma Ave., 1600 - 1604 N. Wilcox Ave.
Case No.: CPC-2016-2601-VZC-HD-CUB-ZAA-SPR
CEQA: ENV-2016-2602-MND

Dear Ms. Wolcott,

I am writing to inform you that, under Public Resources Code Section 21167.5, I intend to file a petition, among other things, under the provisions of the California Environmental Quality Act against respondents City of Los Angeles and Los Angeles City Council in connection with the matter referenced above. Attached is a letter which explains my grievances more fully, and specifies the relief I am seeking.

Thank you for your assistance in this matter.

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Re: Selma Wilcox Hotel
Project Site: 6421-6429 1/2 W. Selma Ave., 1600-1604 N. Wilcox Ave.
Case No.: CPC-2016-2601-VZC-HD-CUB-ZAA-SPR
CEQA: ENV-2016-2602-MND

Dear Ms. Wolcott,

I am writing this letter to inform you that I am preparing to file suit against the City of Los Angeles and the Department of City Planning (DCP) due to violations of State and City law involved in the approval of the Selma Wilcox Hotel (AKA Dream 2), CPC-2016-2601-VZC-HD-CUB-ZAA-SPR, ENV-2016-2602-MND. The approval of this 8-story hotel will have numerous negative impacts on the Hollywood community. 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 approvals granted for this project violate both the California Environmental Quality Act (CEQA) and the Los Angeles Municipal Code (LAMC). CEQA requires that the responsible agency review a planned project in its entirety. The DCP failed to consider clear evidence that, as far back as 2014, Selma Wilcox Hotel/Dream 2 was planned as the second phase of a two-part project which began with the adjacent Dream 1 Hotel. This evidence was made available to the DCP well before the project came before the City Planning Commission, and yet Commissioners failed to consider the evidence in their deliberations. This information was then submitted again as part of my appeal before the Planning & Land Use Management (PLUM) Committee, and yet the PLUM also ignored it. The separate approvals of the Dream 1 Hotel, the Tao Restaurant & Retail Project, and the Selma Wilcox Hotel/Dream 2 clearly violate CEQA's requirement that the whole project be subject to environmental assessment in its entirety.

The City of Los Angeles and the DCP also violated the LAMC by approving a conditional use permit for the on-site sale and dispensing of alcoholic beverages. Not only had considerable evidence been submitted to the DCP regarding the oversaturation of ABC locations in the Hollywood area, but the DCP's own determination attests to the area's exceedingly high crime rate (over 9 times the citywide average), which includes high rates of assault, rape, robbery, and possession of narcotics. In approving liquor permits, the City is required to adopt findings which declare:

- (1)
that the proposed use will not adversely affect the welfare of the pertinent community;
- (2)
that the granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages [;]
- (3) *that the proposed use will not detrimentally affect nearby residentially zoned communities in the area of the City involved [;]*

The evidence in the record demonstrates that central Hollywood is already oversaturated with alcohol, and that crime rates in the area are far higher than the citywide average. Evidence was also submitted showing that research demonstrates a significant relationship between alcohol density and violent crime. The Department of City Planning clearly abused its discretion in finding that the CUP for alcohol service at the Selma Wilcox Hotel/Dream 2 met the requirements prescribed by the LAMC.

Even if we accept the City's contention that the the Mitigated Negative Declaration (MND) produced for the Selma Wilcox Hotel/Dream 2 (ENV-2016-2602-MND) was only required to assess impacts from the project planned for that site, the MND still falls short in its analysis of Noise and Public Services (Police). But in reality, we cannot accept the City's contention that this is a stand-alone project, and must acknowledge the truth: Relevant Group had conceived the entire complex at least as far back as 2014, including the Dream 1 (6417 Selma), the Dream 2 (6421 Selma), the restaurant Tao and the bar Beauty and Essex. Fundraising brochures published on the internet in 2014 offer renderings of the entire complex. CEQA demands that a project must be assessed in its entirety. Instead of adhering to the law, Relevant Group began construction of the Dream 1, then sought approvals for the Tao Restaurant & Retail Project, began construction on that project, then came back the following year with an application for the Selma Wilcox Hotel/Dream 2 on the same site. The developer clearly sought approvals in a piecemeal fashion to avoid thorough review of the entire project.

For these reasons, the City of Los Angeles must rescind its approval of the MND for the Selma Wilcox Hotel/Dream 2 (ENV-2016-2602-MND), and all associated entitlements, including the

CUP for alcohol service. If the City of Los Angeles fails to take these actions, I will be filing suit to seek relief from these abuses.

Sincerely,

Casey Maddren
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