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- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

DAY OF HEARING SUBMISSIONS

February 27, 2023

Central Area Planning Commission
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012
Sent Via E-mail: apccentral@lacity.org

Re: 1723 -1731 N. Wilcox
Case No: ZA-2019-5239-CU-CUB-ZAA-SPR-WDI-1A
CEQA: ENV-2019-5240-CE
SUPPORT APPEAL

Members of the Central Area Planning Commission,

I am writing in support of the appeal filed by UNITE HERE Local 11. As you know, the site for this project is currently occupied by an apartment building with 18 units, two of which are rent-stabilized. The City's ongoing practice of converting or demolishing existing apartment stock to make way for hotels is clearly in conflict with the goals of the Housing Element and the Hollywood Community Plan. Additionally, the City cannot make the required findings to allow yet another alcohol permit in an area that's already oversaturated with alcohol.

When is the City of LA going to stop demolishing housing to make way for hotel rooms? The members of the City Council and the Department of City Planning have repeatedly spoken of housing crisis in LA, but somehow the City keeps approving projects that involve the conversion or demolition of apartments to make way for hotels. Since 2016 the City has approved the conversion or demolition of 305 residential units to make way for hotel rooms, 110 of them in Hollywood.

1850 N Cherokee Ave.	18 units	change of use to hotel
1719 Whitley	40 units	demo of 40 RSO units for new hotel
5825 W Sunset Blvd.	52 units	change of use through TORS overlay

This is clearly in conflict with the goals of the Housing Element and the Hollywood Community Plan.

The City also erred in granting a categorical exemption for this project. CEQA Guidelines 15300.2. (b) states:

All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

There are actually five significant projects within 1,000 feet of the proposed Project that have been approved or are currently under construction. Three of these projects are hotels. Four of these projects have received CUPs to sell alcohol. One of the projects is directly adjacent to the project site.

1717 Wilcox, Whiskey Hotel (directly adjacent to project site, under construction)
A seven-story hotel with 133 rooms, with a CUP to sell alcohol in rooms and restaurant uses.

1624 Wilcox/6430 Hollywood (approved)

Mixed-use project with 260 residential units, and 17,800 sq. ft. of commercial uses, with MCUP for alcohol sales at 3 on-site and 2 off-site establishments.

1631 Wilcox Avenue, Hollywood Arts Collective (under construction)

152 apartment units and approximately 8,000 sq. ft. of commercial space

6516 Selma, tommie hotel (completed in 2022, now open)

212 room hotel with CUP for alcohol in rooftop bars/lounges for hotel guests and the public.

1719 Whitley Hotel (one block west of 1723 Wilcox, approved)

156-room hotel

The residents of Wilcox Avenue have already been dealing with the construction impacts for years. Approval of this project would extend their exposure to airborne contaminants, noise and groundborne vibration for another two years. Beyond that, because four of these projects have received permits to sell alcohol, this neighborhood, already drenched in alcohol, will have to deal with increased crime due to this oversaturation. The cumulative impact of all these projects over time will no doubt be significant. An exception pursuant to CEQA Guidelines 15300.2. (b) certainly applies.

The City cannot make the findings necessary to grant the conditional use to sell alcohol. This area is already oversaturated with alcohol. The additional projects listed above will only increase the oversaturation of ABC locations in this area. A search of the California Alcohol Beverage Control web site showed 12 Type 47 licenses and 2 Type 48 licenses in this census tract. Crime in the area served by the Hollywood Division is already well above the citywide average. There is a substantial body of research showing a relationship between alcohol outlet concentration and violent crime. As one example, I offer the following quote from The Effectiveness of Limiting Alcohol Outlet Density As a Means of Reducing Excessive Alcohol Consumption and Alcohol-Related Harms, Campbell, Hahn, et. al., American Journal of Preventive Medicine, December 2009, page 565-566:

Using a variety of different study methods, study populations, and alcohol measures, most of the studies included in this review reported that greater outlet density is associated with increased alcohol consumption and related harms, including medical harms, injuries, crime, and violence.

The City cannot make the findings required under LAMC Section 12.24 for granting the conditional use.

I urge the Central APC to reject this project.

Sincerely,
Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068

CC: Emma Howard, CD 13, emma.howard@lacity.org
DCP Staff Danalynn Dominguez, danalynn.dominguez@lacity.org



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February 27, 2023

VIA EMAIL ONLY

Los Angeles Department of City Planning
Central Area Planning Commission
200 N. Spring Street, Room 763
Los Angeles CA 90012
Attn: Cecilia Lamas, Commission
Executive Assistant II
Cecilia.Lamas@lacity.org

Re: Withdrawal of Application for NBK Hotel Project (1723-31 Wilcox Avenue, 90028); DCP Case Nos. ZA-2019-5239-CU-CUB-ZAA-SPR-WDI; ENV-2019-5240-CE

Honorable Commissioners:

This office represents NBK, LLC (“Applicant”) in the above-referenced project involving the construction of an 81-room hotel with small ground floor commercial uses (the “Project”) located at 1723-1732 Wilcox Avenue (the “Property”) in the Hollywood community of the City of Los Angeles (“City”). The Project application was submitted on September 4, 2019 to the Los Angeles Department of City Planning (the “LADCP Application”). On March 23, 2022, Applicant received a zoning administrator’s determination to allow the construction of the Project for a hotel consisting of 81 guest rooms, approximately 244 square feet of ground floor retail, and 60 automobile parking spaces within one below ground and one above ground level. On April 7, 2022, an appeal of the zoning administrator’s determination was filed (the “Appeal”). The Appeal is set to be heard on February 28, 2023, by the Central Area Planning Commission. Applicant no longer wishes to pursue the Project and formally requests the withdrawal of the LADCP application.

Applicant has decided not to pursue the Project any further and is thus, withdrawing their Project application pursuant to Los Angeles Municipal Code (“LAMC”) section 11.5.9. LAMC section 11.5.9.A allows a project applicant to withdraw their planning application prior to a final decision by an appellant body. LAMC section 11.5.9.B requires the withdrawal to be in writing. The purpose of

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this letter is to make a request pursuant to LAMC 11.5.9 to withdraw the LADCP Application and satisfy the LAMC section 11.5.9.B written request requirement. Please contact our office if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Manasserian', with a stylized, flowing script.

Christopher Manasserian, Senior Associate
Gonzales Law Group APC