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

SECONDARY SUBMISSIONS

DAY OF HEARING SUBMISSIONS

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*ALSO Admitted in Texas

April 28, 2026

VIA ELECTRONIC MAIL

City of Los Angeles Central Area Planning Commission
Alan Como, Senior City Planner
Los Angeles City Hall
200 N. Spring Street, 10th Floor, RM 1010
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alan.como@lacity.org
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Re: Request for Reconsideration; 2166 North Stanley Hills Drive and 2172 North Stanley Hills Drive; Case Nos. ZA-2025-1386-CU1-HCA-1A and ZA-2024-6711-CU1-HCA-1A; Related Case Nos. ZA-2024-6711-CU1-HCA and ZA-2025-1386-CU1-HCA; Environmental Case No. ENV-2024-6712-CE

Dear Members of the Central Area Planning Commission:

This firm represents Concerned Citizens of Stanley Hills Drive ("Appellants"). Pursuant to Section 7.3 of the Commission's Rules and Operating Procedures, Appellants respectfully request that a Commissioner who voted in support of the April 14, 2026 action move to reconsider these matters at the April 28, 2026 meeting. Reconsideration is warranted on three independent grounds: the decision rests on a "mitigated" categorical exemption that is legally untenable; the Commission was not advised of its authority to remand under Los Angeles Municipal Code ("LAMC") § 13A.2.8.C.5(b); and the new fire-safety condition does not discharge the Planning Department's present duty under the State Minimum Fire Safe Regulations. These cases do not expire until May 5, 2026.

I. THE CONDITIONS ADDED ON APRIL 14 ARE MITIGATION MEASURES, WHICH DEFEAT THE CATEGORICAL EXEMPTIONS.

Two Commissioners stated unequivocally on the record that this Project warrants further environmental review. Vice President Stromberg found that "the exceptions here under 15300.2A and C could definitely apply," and stated, "I just really think this project warrants an environmental impact report." Commissioner Welliver agreed that the Project "likely does warrant additional environmental analysis," and identified specific cumulative and biological impacts — including bifurcation of the wildlife corridor connecting habitat on either side of Stanley Hills Drive — that he believed could support findings under the unusual-circumstances and cumulative-impacts exceptions. See CEQA Guidelines § 15300.2(b), (c). Rather than grant the appeals, however, the Commission added new and modified conditions of approval to address those impacts: new Condition 12A requires demonstration of compliance with Public Resources Code § 4290 and the State Minimum Fire Safe Regulations;

modified Condition 16 requires outdoor lighting to be shielded and directed downward “to avoid light spillage into adjacent natural habitat areas, to minimize disruption to nocturnal wildlife”; and a new condition was added requiring asbestos testing and abatement.

Those are textbook mitigation measures, designed to reduce impacts on biological resources, fire safety, and air quality. The Deputy City Attorney effectively conceded as much on the record, observing that the wildlife-related conditions sounded “more like environmental analysis . . . which . . . doesn’t quite reconcile with . . . a determination that a project would be categorically exempt.” It is settled law that an agency may not lean on mitigation to defend a categorical exemption. *Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1108 (“The determination of whether a project may impact a designated environmental resource must be made without reference to or reliance upon any proposed mitigation measures.”) The April 14 decision is, in substance, a “mitigated categorical exemption,” and it cannot stand.

II. THE COMMISSION WAS NOT ADVISED OF ITS AUTHORITY TO REMAND FOR FURTHER CEQA REVIEW UNDER LAMC § 13A.2.8.C.5(B).

Although a Commission majority believed additional environmental analysis was warranted, the Commission declined to grant the appeals because staff advised that doing so would preclude the applicant from returning with substantially the same project. That advice was incomplete. Under LAMC § 13A.2.8.C.5(b), the appellate body has express authority to “remand the decision to the initial decision maker for further proceedings,” which can include preparation of an initial study and, if warranted, a mitigated negative declaration or an EIR. Had the Commission been so advised, it could have granted the appeals and remanded for proper CEQA review without “denying the project” in any final sense. The City Attorney’s failure to identify this option is independent good cause for reconsideration.

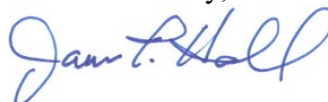
III. NEW CONDITION 12A DOES NOT DISCHARGE THE PLANNING DEPARTMENT’S PRESENT DUTY UNDER PRC § 4290 OR THE CAL FIRE NOTICE REQUIREMENT.

New Condition 12A requires LAFD review for State Minimum Fire Safe Regulations compliance prior to building-permit issuance. It does not relieve the City Planning Department of its independent, present, ministerial duty to apply those regulations during the entitlement phase. As explained in our April 14, 2026 rebuttal — and as alleged in *Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles* (Verified Pet., filed Dec. 23, 2025) — deferring compliance to a later, closed-door LAFD review substitutes an unlawful “feasibility” review for the mandatory “Same Practical Effect” standard and bypasses the formal Exception process required by 14 C.C.R. § 1270.07, including the requirement that any local exception be forwarded to CAL FIRE unit headquarters. See also 14 C.C.R. § 1270.05.

For these reasons, Appellants respectfully request reconsideration, grant of the appeals, and remand to the Zoning Administrator under LAMC § 13A.2.8.C.5(b) for further CEQA review.

Thank you for attention to this matter. If you have any questions or concerns, please contact me at jamie.hall@channellawgroup.com.

Sincerely,



Jamie T. Hall

GGC LAW

Golden Group Consulting

8033 W. Sunset Blvd.
Suite 1066
Los Angeles, CA 90046

Tel: 310-890-5505

rouzbeh@ggclawfirm.co

Dear President Lawrence and Commissioners:

Stanley Family Residence, the Owner/Applicant for the above permit applications, submits this emergency objection under protest and without waiver. We understand that the appellant has sent a last-minute letter asking the Commission to reconsider its prior decision. We vehemently oppose any reconsideration tonight, and object to any reopening, rehearing, deliberation, or decision on the merits tonight. Please place this letter in both case files and circulate it to all Commissioners, the City Attorney representative, and Planning staff before Item 4 is called.

1. No Proper Notice. The April 28 agenda does not identify either Stanley case by case number, address, applicant, owner, project, appeal, or issue. It contains only a generic “Reconsiderations” heading and a project-specific public hearing for an unrelated 5700 West Santa Monica Boulevard matter. Government Code section 54954.2 requires a 72-hour posted agenda with a brief general description of each business item, and bars action or discussion on non-agenda items except narrow exceptions that do not apply. Central Area Planning Commission Rule 4.3 says the same. We received no legally adequate notice, staff report, statement of grounds, service of the appellant’s letter, or meaningful opportunity to prepare.

2. Merits Cannot Lawfully Be Heard Tonight. Even if a motion to reconsider could be made, Rule 7.3 allows reconsideration only if jurisdiction remains, only once, and only by a Member who voted in support of the original Commission Action. Rule 7.3 further provides that if reconsideration is approved at the next regular meeting, the merits must be placed on a separate agenda item for the following meeting, provided the time to act has not expired. A generic agenda item and an appellant letter cannot override Rule 7.3, the Brown Act, the LAMC, or due process.

3. No Jurisdictional Extension; No Consent. Reconsideration must be within the existing time to act. The appeal application instructions state that if the appellate body cannot hear and consider the appeal within the applicable time, the appeal is automatically deemed denied and the original decision stands; the last day to act may be extended only if formally agreed upon by the applicant. Stanley Family Residence does not consent to any extension, tolling, revival, enlargement, or waiver of the Commission’s time to act.

4. Ex Parte and Noncompliant Materials Must Not be Considered. These are quasi-judicial permit proceedings affecting substantial property rights. Rules 11.1-11.3 require Commissioners to accord interested persons the full right to be heard and prohibit private ex parte communications concerning pending quasi-judicial matters unless the Commissioner is recused. Any appellant letter, email, call, meeting, or other contact must be disclosed on the record and cannot be considered unless served on us with adequate time to respond. The April 28 agenda also imposes submission deadlines and states that noncomplying submissions will be stamped “File Copy. Non-Complying

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Submission,” not delivered to or considered by the Commission, and not included in the official administrative record. Any late, unserved, or noncompliant appellant submission must be disregarded.

5. Fair-Hearing Safeguards Must be Honored. Rule 6.2 requires equal time for appellants and applicants in appeal cases. Rule 7.2 requires any voting Commissioner in a quasi-judicial approval to have been present for the entire prior hearing or to have listened to the audio recording of the prior relevant proceedings. A same-night merits rehearing would be a one-sided ambush and would deny the Owner/Applicant a fair hearing, equal participation, and the ability to prepare a record response.

Demanded Action Tonight

Stanley Family Residence demands that the Commission: (1) reject, deny, disregard, or decline to entertain the appellant’s reconsideration request; (2) not reopen, rehear, deliberate on, or decide the merits of either Stanley Hills case tonight; (3) not consider any letter, evidence, or argument that was not timely submitted, properly served, and made available to the Owner/Applicant with adequate response time; (4) disclose all ex parte contacts and submissions on the record; (5) confirm jurisdiction and Commissioner eligibility before any vote; (6) recognize that we do not consent to any extension of time and do not waive any objection; and (7) if the Commission nevertheless believes a motion to reconsider is legally available, limit tonight’s action to that motion only and do not address the merits unless and until a separate case-specific agenda item is lawfully noticed for a future meeting and jurisdiction remains.

Notice of Writ and Oversight Remedies

If the Commission violates the Brown Act, its own Rules, the LAMC, time-to-act limits, or due process by reconsidering or rehearing the merits tonight, Stanley Family Residence will immediately pursue all available remedies, including writ of mandate, mandamus, injunctive, declaratory, and stay relief under Code of Civil Procedure section 1094.5 and Government Code sections 54960 and 54960.1. We will seek to set aside any unlawful action, preserve the original approvals/decisions, and recover all available costs, fees, and other relief. We will also submit formal complaints and requests for investigation to appropriate oversight authorities, including the City Attorney, Department of City Planning leadership, the Mayor and City Council offices, the Los Angeles City Ethics Commission, and, as appropriate, the Los Angeles County District Attorney and California Attorney General.

ROUZBEH ZARRINBAKHSHE.SQ.

Attorney for Stanley Family Residence LC.



Formal Opposition: Case No. ZA-2020-1648-CUB-1A | 5700 West Santa Monica Boulevard

Dustin <dustinbran@gmail.com>

Mon, Apr 27, 2026 at 4:58 PM

To: apccentral@lacity.org

Subject: Formal Opposition: Case No. ZA-2020-1648-CUB-1A | [5700 West Santa Monica Boulevard](#)

RE: PUBLIC HEARING REFERENCE INFORMATION

- Case Number: ZA-2020-1648-CUB-1A
- Environmental Case Number: ENV-2020-1649-CE
- Related Case Number: ZA-2014-2554-CUB-CU

I am writing to strongly oppose the alcohol permit for the 7-Eleven on Wilton and Santa Monica. My name is Josue Dustin Bran and I have lived on N Ridgewood Pl for all 35 years of my life. I know this neighborhood inside and out. My father actually owned a store about a block away back in the 90's so I have firsthand experience with how these businesses operate and the crowd they can attract. We are a low income area that already struggles with crime and adding another alcohol location is the last thing we need. There is already a liquor store across the street that has constant issues with loitering and homeless people. This 7-Eleven is already dirty and the pavement is filthy. If they can't even keep the store clean right now, they definitely should not be trusted with an alcohol license. We deal with a lot of DUI drivers in our area especially with West Hollywood so close to us.

I just want to be able to walk in and buy snacks without being harassed by people drinking outside. It creates a real danger for families and regular people just trying to get some snacks. I can tell you that saturating a vulnerable neighborhood with more liquor is a mistake. We need businesses that make the area safer, not ones that bring more grime and problems.

Please deny this appeal/permit.

Sincerely

Josue Dustin Bran
952 N 1/2 N Ridgewood PL
[Los Angeles CA 90038](#)
Dustinbran@gmail.com

LOS ANGELES POLICE DEPARTMENT

Jim McDonnell
Chief of Police



Karen Bass
Mayor

P. O. Box 30158
Los Angeles, Calif. 90030
Telephone: (213) 972-2996
TDD: (877) 275-5273
Ref #: 6.1

May 13, 2025

Mr. James Quintana
Department of Alcohol Beverage Control
888 S. Figueroa St, Room 320
Los Angeles, California 90017

Pending Lic. #663782

Dear Mr. Quintana,

The Los Angeles Police Department, Hollywood Area, received correspondence from the Department of Alcohol Beverage Control indicating that applicant Sherrie Olson is doing business for "7-Eleven," at the address of 5700 Santa Monica Blvd, Los Angeles, California. Olson has petitioned for an ABC license to sell a full line of alcoholic beverages for off-site consumption, in conjunction with a 2,237 square foot location.

Hollywood Vice investigators are responsible for assessing the petition and have conducted extensive research related to the operational history of the applicant, area and the functionality of the subject premises.

There is an existing liquor store, Tony's Liquor, which is located directly across the street at 5707 Santa Monica Blvd from the proposed location and has a daily negative impact on the quality of life for residents in the neighborhood. Crimes associated with these alcohol establishments include robbery, aggravated assaults, burglaries and thefts. Radio calls generated by citizens reflect nuisance and complaints related to alcohol consumption, public urination, defecation and disorderly conduct.

Hollywood Vice personnel have received numerous emails and phone calls from residents surrounding the subject premises. The opposition expressed is due to the on-going negative quality of life issues the community experiences daily.

Procurement and inspection of LAPD calls for service summary report, related at the address of 5700 Santa Monica Blvd, indicated that since February 1, 2025, eighty-three (83) radio calls for police service were generated; the majority of them reflecting nuisance complaints associated with the subject premise area.

The ongoing sale of alcohol in the area has consistently contributed to increased criminal activity and public safety concerns. This is evidenced by frequent radio calls involving intoxicated individuals, aggressive subjects, medical emergencies, mental health crises, and homelessness.

These incidents place a continuous strain on local law enforcement, emergency services, and community resources. Adding another location that sells alcohol in this already impacted area would only worsen the situation, likely resulting in further disturbances, safety risks, and a decline in overall community well-being.

Hollywood Vice personnel strongly oppose authorizing any form of support for the establishment of another alcohol-selling location in the area, given the history of disruptive incidents and the numerous citizen complaints from the immediate vicinity. We respectfully request that the contents of this letter be considered upon deciding to grant or deny an ABC license to the applicant in this matter.

Thank you for your time and cooperation in this matter. If you have any questions, please contact Officer Andy Hernandez 42657@lapd.online or Hollywood Vice Unit, ABC Section, at (213) 972-2996.

Very truly yours,

JIM MCDONNELL,
Chief of Police



CRAIG HEREDIA, Captain
Commanding Officer
Hollywood Area



Case Number ZA-2020-1648-CUB-1A

Stefanie Keenan <stefaniekeen.sk@gmail.com>

Wed, Apr 15, 2026 at 7:29 AM

To: Planning APC Central <apccentral@lacity.org>, Monique Acosta <monique.acosta@lacity.org>, stephanie.gavidia@lacity.org

Cc: Sabine Bradley <sabinebradley@gmail.com>, Keith Johnson <kjphotog@gmail.com>

Good morning,
Sorry if I send this double but I just want to make sure this is received.

Thank you!

To Whom it may concern:

We would like documentation added here to the hearing appeal on April 28th 2026.

Case Number

ZA-2020-1648-CUB-1A

Related Case NR.

ZA-2014-2554-CUB-CU

The Store 7/11 located at [5700 Santa Monica Blvd](#) has historically been a safety issue but also a draw for Narcotic sales outside of its premises.

We had to complain constantly about their trash mitigation, homeless encampments on the property as well as trash from this property and the stripmall everywhere in the community.

The Community really can't carry another draw for addicts here.

We have sober houses, interim shelters as well as a harm reduction not far from this. It would be detrimental to the community.

The Community had 0 outreach about this and we only learned of the granted liquor license 1 month ago. We are appealing it heretofore.

Further right across the street we have Tony's Liquor on a similar Strip mall that sells alcohol so the need to have another store sell alcohol not even 500 feet from this one that already sells alcohol isn't given.

Attached a Letter that was sent per Certificate mail in February 2023.

Photos attached.

I sent it under the Hollywood District Association as there was no Civic representative at that time.

Thank you and see you on the 28th.

Attn.

Tenants of Yousef & Mehran Eshtiaghpour Property

[5700 Santa Monica blvd.7/11](#); La Pupusa Loca [5716 Santa Monica Blvd](#); BBQ+RICE EaHo [5706 Santa Monica Blvd.](#); Sabor Mexicano [5710 Santa Monica Blvd.](#)

Yousef & Mehran Eshtiaghpour Property

Et al

To whom it may concern:

The Hollywood District Association is aware that property management failures and activities at your properties are having a continuing adverse effect on neighbors and our neighborhood.

Further, it appears that your failure to maintain these properties and the allowance of certain activities may be in violation of both

your legally mandated responsibilities as a landlord and Tenant and may, in fact, be facilitating third parties to violate criminal statutes.

These failures and activities have been noted for at least three years.

We are aware that **Yousef & Mehran Eshtiaghpour Property** and its Tenants have been made aware of them repeatedly during this time period. To date, **Yousef & Mehran Eshtiaghpour Property** and its

Tenants has not acted to remediate concerns nor has it in any way given any indication that it takes reports of these activities with a serious or any intent to deal with them in a away constructive to the situation and to the maintenance of a safe and secure community.

Here are our two major concerns:

1.
Failure to properly manage and dispose of trash. Trash is left on the properties, Trash is left and allowed to accumulate for long duration o the ground and next to rather than in the trash Containers. This trash causes tripping hazards for passers-by. This trash further is a health risk as it attracts rodents, insects and disease. Trash is also spilling over onto neighboring properties and our streets causing nuisance for both neighboring properties and our community. The Gates to the Trash-containers are not securely locked.
2.
Neighbors have observed drug dealing on the properties in question:
Drugs are being sold by individuals while on these properties and especially to the youth in the neighborhood. **Yousef & Mehran Eshtiaghpour** Property and its Tenants has failed to take measures or action to stop the sale of drugs on the property.

With your disdain and disregard to our concerns you have adversely affected the neighborhood and we can and will no longer stand for your lack of action:

Our kids live here. Neighbors, including young students and elderly people, and the public along with their pets need to use the sidewalks. The activities at your properties pose risks to the elementary school on the next block and a middle school nearby. It has become increasingly difficult for anyone and everyone to use the sidewalks, impacted by trash and illicit activities at your properties, to safely go to school, work, or to walk their dogs.

Again these conditions present a public nuisance and health hazards They are dangerous. They have been going on for the past three years as you have been repeated informed.

The Hollywood Studio District Association (HSDA) has made numerous attempts to resolve these issues in a friendly manner but to no avail.

You have taken no action. You have made no changes.

Hence, HSDA is now prepared to bring legal action against **Yousef & Mehran Eshtiaghpour** Property and its Tenants.

We demand these issues enumerated above be remedied within the next ten (5) days, and that you inform us in writing about the steps you are going to take to

- 1)
remedy the trash and drug sale and use issues and
- 2)
the steps that **Yousef & Mehran Eshtiaghpour** Property and its Tenants of will implement to prevent these issues from reoccurring.

If we do not hear back from you within the next 5 days, we will proceed with legal action against you.

Sincerely,

Hollywood Studio District Association





TONY'S
QUO

Metro Bus

M







SPEED
LIMIT
35

WORK



5700 Santa Monica CUP appeal

1 message

Suriya Prasad <prasad.suriya@yahoo.com>
To: Planning APC Central <apccentral@lacity.org>

Tue, Apr 28, 2026 at 10:08 AM

Case Number: ZA-2020-1648-CUB-1A

Commission members:

Please support the appeals of the Zoning Administrator's approval of a Conditional Use Beverage permit for [5700 Santa Monica Blvd](#). The community strongly opposes alcohol sales at this 7-11.

The zoning administrator relied on the Hollywood Studio District Neighborhood Council's support for the CUB in approving the grant.

Yet none of the members of this neighborhood council are elected. Instead, due to a lack of quorum the neighborhood council was suspended, elections were canceled, and Board members were seated by the Department of Neighborhood Empowerment, as noted in the city's election results shown below:

[Home](#) > [Clerk Divisions](#) > [Elections](#) > [Neighborhood Council Elections](#) > [2025 NC Election Results](#)

☰ 2025 NC Election Results

Click on the Region card to view the Election Results for each region.

OFFICIAL

Region 5

[Central Hollywood](#)

[East Hollywood](#)

[Greater Wilshire](#)

[Hollywood Hills West](#)

Hollywood Studio
District*(Board Affirmation)

[Hollywood United](#)

[Mid-City West](#)

[P.I.C.O](#)

* In accordance with Section 3.13 (Board Affirmation and Loss of Quorum) of the 2025 NC Election Handbook, this Neighborhood Council Election has been suspended and canceled. All certified candidates will be seated by the Department of Neighborhood Empowerment.

**Robert Blue & Sieglinde Kruse Blue
Los Angeles, CA**

bob.blue@live.com

ziggykruse2005@yahoo.com

April 26, 2026

Via email only

Central Area Planning Commission
Los Angeles City Hall
Attn.: Monique Acosta, City Planner
200 North Spring Street
10th Floor, ROOM 1010
LOS ANGELES, CA 90012
apccentral@lacity.org

**Re: SUPPORT FOR APPEAL filed by Casey Maddren and Citizens for a Better Los Angeles (CBLA), Case Nos.: ZA-2020-1648-CUB-1A; ENV-2020-1649-CE
Project Address: 5700-5716 West Santa Monica Blvd**

Dear Commissioners,

As founding members of the Hollywood Studio District Neighborhood Council—with Robert Blue having served as the first Chairperson and Ziggy Kruse as the Board's Correspondence Secretary during our tenures—we are writing as long-standing stakeholders to express our full support for the appeal filed by Casey Maddren and CBLA. Having remained deeply invested in this community's health and safety long after our formal service concluded, we visit the area frequently and are alarmed by its visible and steady decline.

It is our observation that this transformation from a functional neighborhood into one struggling with severe blight and public safety issues is a direct consequence of a lack of meaningful engagement and oversight by the leadership of Council District 13 and the local Neighborhood Council. The failure of these representative bodies to address existing issues has created a vacuum where nuisance activities flourish. Granting an alcohol permit at this location, even with restricted hours of sale (6 AM – 2 AM) within a 24-hour operation, would only accelerate this downward trend.

We urge the Commission to grant the appeal and deny the CUB based on the following critical issues:

1. Documented Site Blight and Management Failures (See Attached Photographs)

The physical condition of this 7-Eleven has deteriorated significantly over the last decade. Photographic evidence from 2016 through 2026 shows a marked increase in graffiti, property neglect, and unauthorized encampments directly on the premises. An alcohol permit will only exacerbate these nuisance activities, which the current operators have already demonstrated an inability to manage.

Notably, the City's own Letter of Determination (LOD) acknowledges these **chronic** issues by mandating strict 24-hour graffiti removal and the removal of a free-standing payphone to deter loitering.¹ These conditions have persisted despite current operational requirements,

¹ Source: Case No. ZA-2020-1648-CUB, Letter of Determination (LOD).

proving that the site is not currently under effective control.

2. Alcohol License Density and Over-Concentration

The 90038-zip code is already burdened with approximately 60 active alcohol licenses. Specifically, in Census Tract 1910.00, where this 7-Eleven is located, the Department of Alcoholic Beverage Control (ABC) typically authorizes only 3 on-site and 2 off-site licenses.

However, there are already more than 33 licenses in this tract alone, a nearly 700% over-concentration.² Adding the sale of beer and wine for off-site consumption at a 24-hour convenience store in an area already suffering from such high alcohol license density provides no community benefit and ignores the documented relationship between license concentration and community harm.

3. Acknowledged Public Safety and Crime Risks

This specific 7-Eleven has become a flashpoint for criminal activity. On August 16, 2024, this location was one of several stores targeted in a series of coordinated flash mob robberies where large groups ransacked the premises.³

The City's LOD confirms the high-risk nature of this site by requiring the applicant to patrol the parking lot with private security and keep all beer and wine products in locked displays or cages.⁴

Without a proactive plan from CD 13 to address current safety concerns, adding more alcohol to a 24-hour operation is irresponsible. Research indicates that high alcohol license density is positively associated with increased rates of violent crime, including robbery and aggravated assault.

4. Improper Use of CEQA Exemption

This project does not qualify for a Class 1 Categorical Exemption. Given that Los Angeles has a property crime rate of 15 per 1,000 residents—higher than 77% of other California cities—the City must account for the unusual circumstances and cumulative safety impacts of placing another alcohol outlet in a high-crime corridor.⁵

Furthermore, the lack of proactive local government engagement in mitigating blight at this intersection constitutes an unusual circumstance that necessitates a full environmental and safety review rather than a summary exemption.

The residents of this area deserve leadership that prioritizes community stability over commercial expansion. We request that the Central Area Planning Commission uphold the appeal and deny the CUB.

Sincerely,
Ziggy Kruse Blue and Bob Blue

² Source: California ABC Census Tract Authorizations and Appeal Recommendation Report.

³ Source: LAPD Online Newsroom, NR24266ti.

⁴ Source: Case No. ZA-2020-1648-CUB, LOD, Conditions 15 & 16.

⁵ Source: L.A. County Department of Public Health.



















