



January 17, 2014

VIA HAND DELIVERY

Central Area Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

Re: 1130 S. Hope Street
Case No. ZA 2012-3185 (VCU)(ZV)(ZAA)(TDR)

Dear President Acevedo and Commissioners:

This law firm represents Luma Homeowners Association (“Luma”) and its members. The Luma community is a residential high-rise located at 1100 S. Hope Street, Los Angeles, immediately adjacent to the proposed Hope St. Hotel, and neighboring the Elleven and Evo residential properties. Due to the multiple undesirable impacts that will significantly impair the quality of life and the value of the Luma homeowners’ investments, Luma is opposed to the approval of the Hope St. Hotel in the R5 zone as currently designed and conditioned, and Luma has filed an appeal to the Zoning Administrator’s decision.

Luma, like Evo, believes that the proposed hotel project will create intolerable congestion, noise, traffic, parking and loading issues the immediately neighboring communities, and for that reason, joins Evo in urging the City to deny approval of the numerous variances requested for this project and to add conditions to further protect neighbors.

Luma concurs with Evo that the proposed hotel is too large for the dimensions of the property site. The proposed hotel, at 60,000 square feet, would triple the size of the existing building. The surrounding alleyways, street frontage and setbacks are grossly inadequate to service the traffic for a hotel of that size without creating an unacceptable burden on the surrounding communities.

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Luma's appeal is based on the following grounds:

M-F
5AM - 11PM
6AM - MIDNIGHT
WEEKENDS

- 1) Bar and pool deck hours should be more restrictive. Due to the close proximity of the HOA communities to the hotel, extended bar and restaurant hours increase likelihood of noise disturbance to residents. Curfew for rooftop and other outdoor bar/restaurant areas, as well as for the pool deck, should be 10:00 pm; and midnight for basement bar and enclosed restaurant areas. Additional measures should be required which guarantee that noise from the rooftop bar and pool, and from late-night bar guests, will not cause disturbance for neighboring residential communities after 10:00 pm.
- 2) Activities in adjoining streets and alleys must be limited to (a) reduce noise and emissions problems for residents, and (b) avoid negatively impacting HOA filming revenue. Reasonable residential decibel limits must be established for exterior noise emissions. Cars must not be allowed to idle in any alleyway while waiting to drop off or pick up guests of the hotel, restaurants or clubs. Security must be required to keep alleys and sidewalks fronting residential areas free from loitering by patrons of hotel facilities. Side and north alleys are frequently used for staging areas during filming and must be kept clear for such use. The HOAs derive significant revenue from such filming and that revenue would be severely and adversely impacted, if not eliminated entirely, by the level of use that would be required by a 60,000 square foot hotel.
- 3) Shading studies need to be addressed. Shading studies show that Luma's pool will be shaded for a large portion of each day. The HOA residents' enjoyment of the pool and the sun would be severely limited if the hotel is approved as currently designed. This is unacceptable and must be addressed by the developer.
- 4) Smoking should not be permitted in the alley north of the hotel. Smoking in alleys abutting the residential communities should be prohibited. Outside smoking should be permitted only in specifically designated areas that are located at least 100 feet from residential areas. HOA communities should be able to enjoy a smoke-free environment in and around their own homes and open their windows without having to worry about the odors, not to mention potential health risks, from second-hand smoke.
- 5) Developer and operators should be responsible to HOAs for compliance. Violations must be actionable by HOAs against the developer and any operators

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to ensure compliance. It is insufficient to establish a hot line for resident complaints; no mechanism is available for residents to obtain redress for damages caused by hotel's failure to comply.

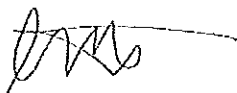
- 6) ZA should require changes in the hotel's business model to be disclosed and approved. Changes in the business model, format and/or target clientele must be disclosed to neighboring HOAs and become an automatic condition of termination if not approved by the ZA. Otherwise, the nature of the project is subject to modifications that can adversely impact the neighboring communities without their notice or input.
- 7) The traffic study needs to address uses by non-hotel guests of the bars, lounges and restaurants. Parking, loading and setback requirements should be revised, to take into account such additional uses.
- 8) Luma concurs with Evo that loading should not be permitted in the north alley, due to lack of the high level of delivery traffic expected and lack of available space in the alley for use of both delivery trucks and HOA residents. Condition 36 of the Zoning Administrator's decision allows the hotel to stripe an area of the public alley to the north of the hotel as a private loading area. Most of this alley is only 20 feet wide and allows no parking. The area of the alley that "widens to 30 feet along the rear 40 feet of the subject site where the loading area is required to be located" is not (as mistakenly stated on page 40 of the Decision) adequate for a loading area. That area contains Luma's e-power refueling station and two employee parking spaces; what remains is not large enough to accommodate an off-street loading area and would effectively block the alley (see enclosed photographs; exhibits will be available at the hearing). Accordingly, it is unacceptable for any use of the north alley for truck loading and unloading, as such use would severely impact accessibility of roadways for use by residents.
- 9) Luma concurs with Evo that adequate passenger and valet drop off must be provided, and no adjoining streets, alleys or private property should be blocked at any time. Overflow from the narrow Hope Street frontage will only encourage hotel guests to wait in the surrounding alleys and streets, which will cause unwelcome blockages that will impair the value, use and enjoyment of the adjoining communities by their residents and visitors. This is simply unacceptable. Further, as pointed out by Evo, the project's traffic analysis which purported to take into account the valet operations was deficient and did consider the traffic generated by public dining and meeting facilities in the hotel.

PARKER SHUMAKER MILLS LLP

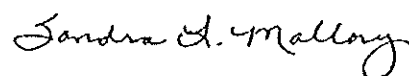
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For the foregoing reasons, and further testimony that will be provided at the public hearing scheduled for January 28, 2014, Luma opposes the approval of the Hope Street Hotel as currently designed and conditioned.

Sincerely,



CHARLES M. SHUMAKER
Partner



SANDRA L. MALLORY
Of Counsel

Enclosures