

# MOUNTAINGATE OPEN SPACE MAINTENANCE ASSOCIATION

Alan Como, AICP

City of Los Angeles, Department of City Planning

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Dear Alan -

I am writing on behalf of the Mountaingate Open Space Maintenance Association (MOSMA) to request the City of Los Angeles Planning Department grant the community a 45-day extension from the December 21, 2020 comment submission deadline in the Berggruen Institute Project, Case No. ENV-2019-4565-EIR for a number of reasons, including COVID restrictions, holidays, and the complex nature of this proposed project.

The Notice of Preparation (NOP) was released on November 20, 2020, less than a week before the Thanksgiving holiday, in the middle of a COVID spike. Following the Thanksgiving long weekend, the County of Los Angeles ordered residents to stay at home and banned public and private gatherings until December 20; Covid cases continue to rise. As of December 2, Los Angeles County reported more than 7,500 new cases — the most in a single day. It should also be noted that Hanukkah begins December 10, 2020, ending on December 18, just two days before the comment submission deadline. Considering these unprecedented economic, social, and public health upheavals, we ask the city to extend the 30-day minimum comment period.

The City and the applicant have had multiple years to prepare the detailed Initial Study (IS). In contrast, the public has only four weeks during this Covid-19 emergency and this holiday period to respond.

Under normal circumstances, the nuanced and technical issues addressed in the Berggruen Project IS would be hard to review adequately in just 30 days. But, during a pandemic when in-person meetings are restricted, some members of the community don't have access to computers, others are preoccupied with home-schooling and working from home, it blatantly violates the CEQA policy of fostering public participation.

As you know, public comments for such projects ordinarily come from many local public interest organizations, homeowners associations, such as MOSMA, other community-oriented groups, and private individuals. Due to the COVID-19 pandemic, none of these organizations can operate with in-person meetings, creating a disjointed environment to make informed decisions on critical projects such as this one. MOSMA, which represents

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those residents who would be most impacted by this project, will not be meeting again until January 2021, which does not allow our board members the opportunity to discuss the scoping meeting or approve comments by the Dec. 21, deadline. Other organizations that would normally participate in this process, have informed that they won't be meeting until January 2021, as well.

Additionally, for stakeholders and their representative organizations to thoroughly understand the implications of these processes related to the environmental impacts, they often rely on an initial review of the project by technical experts. However, it will be difficult to find experts who can undertake that review in the limited time allotted.

Berggruen's Think Long Committee for California, founded in 2010, champions transparency and good governance; public input is central to good governance. Rushing a project of this size and scope, which demands time to effectively and accurately deliver salient public input, through the comment period, seems to go against everything Berggruen stands for.

It is incumbent upon the City and the Berggruen Institute to allow a fair and open process for communities and stakeholders potentially impacted by this proposed project to be given adequate time to review the IS safely, and to be able to formulate thoughtful and intelligent comments.

Please notify of us your decision at your earliest convenience.

Regards,



Stephen Drimmer  
President