



**December 10, 2020**

Alan Como, AICP  
City of Los Angeles, Department of City Planning  
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Los Angeles, CA 90012  
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Hon. Mike Bonin  
Councilmember, CD-11  
Room 395, City Hall  
200 N. Spring Street  
Los Angeles, CA 90012  
[mike.bonin@lacity.org](mailto:mike.bonin@lacity.org)

Re: Berggruen Institute Project, Case No. ENV-2019-4565-EIR  
**Request for Extension of Public Comment Period**  
Current Deadline: December 21, 2020

Dear Mr. Como and Councilman Bonin:

The Sierra Club, founded in 1892, is the nation's oldest and largest environmental and conservation organization, with over two million members and supporters, of whom 150,000 reside in California. The Santa Monica Mountains Task Force was created in 1972 to work for preservation of open-space and precious biological resources in the largest intra-urban mountain range in the United States. One of our goals is to promote and protect wilderness open space and trails in the Santa Monica Mountains.

We write to request that you extend by 60 days, from December 21 to February 21, 2021, the period of time in which the public can review and comment on the Notice of Preparation released November 20, 2020, and the topics covered at the Scoping Meeting held December 8, 2020.

The Sierra Club has been following this project closely, and with concern, for many years; in fact, before Nicolas Berggruen even purchased the subject property from Castle & Cooke. As is evident from the Scoping Meeting on Tuesday, this hotly controversial project implicates a myriad of complex legal, land-use, environmental and CEQA issues that cannot possibly be reviewed, analyzed and responded to in just thirteen (13) days.

Of particular concern to the Santa Monica Mountains Task Force are the effects this impactful project will have on the environment, including the open-space conservation easement held by the Mountains Recreation and Conservation Authority over more than 90 percent of the land, and especially its impact on the trails. In particular, that includes the Mount Saint Mary's Fire Road and the Riordan Trail, used by our members for hiking. We are also concerned about wildfires, and the propensity of the project to increase fire danger. That concern is not abstract or speculative: the last (Getty) fire burned the Berggruen property, the MRCA's open space easement, Bundy Canyon and the Riordan Trail.

The Sierra Club was instrumental in obtaining the dedication of the Riordan Trail more than ten years ago, and helping build the trail descending into pristine riparian woodland in Bundy Canyon. I have seen a video of Nicolas Berggruen personally vowing to keep the public off his property.

It is hard to escape the suspicion that the timing of these filings and hearings on the part of the Applicant was no accident or coincidence, as opposed to a deliberate plan to deter and discourage public comment. The NOP was released on the Friday before Thanksgiving; the deadline for public comment, December 21, falls just four days before Christmas when members of the public will be traveling, or preparing for and celebrating the holidays. There is no way a project of this complexity can be properly analyzed in that time-frame.

The Sierra Club Santa Monica Mountains Task Force urges you to extend the deadline for public comment by 60 days, to February 21, 2021.

Please contact the undersigned at (310) 709-9268 or [lahasa@aol.com](mailto:lahasa@aol.com) with any comments or questions.

Sincerely,

*Eric Edmunds*

Eric F. Edmunds, Jr.  
Chair,  
Sierra Club Santa Monica Mountains Task Force