

MANDEVILLE CANYON ASSOCIATION

P.O. Box 49802
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October 25, 2019

Councilmember Michael Bonin, 11th District
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Joe Edmiston, Executive Director
Mountains Recreation and Conservation
Authority
600 N. San Fernando Road
Los Angeles, CA 90065

Vincent Bertoni, Director of Planning
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Milena Zasadzien, Major Projects
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Ladies and Gentlemen:

Mandeville Canyon Association urges the City and the MRCA to reject the Environmental Assessment Form and Initial Study recently filed by the Berggruen Institute because it is fundamentally misleading in falsely characterizing the Berggruen Project and its setting.

Berggruen is proposing private offices, accommodations and a private events center in the midst of public open space and a Very High Fire Hazard Severity Zone, where existing residents have highly constrained and overburdened routes of escape. Because its use is not permitted, and because its project grossly exceeds hillside height limits and slope density standards, Berggruen claims its project is an "Educational Institution." However, the LAMC expressly defines "Educational Institutions" as "colleges or universities supported wholly or in part by public funds and other colleges or universities giving general academic instruction as prescribed by the State Board of Education."

Private colleges and universities must be licensed by the Bureau for Private Postsecondary Education to do business in California. By its own admission, the Berggruen Institute is not a college or university, but simply a privately operated public policy organization that employs staff and provides grants to serve its own initiatives. It is truly disappointing that the Berggruen Institute, which purports to support progressive values and reform, is affirmatively misrepresenting itself to the public and your agencies in order to evade hillside zoning rules and environmental protections.

As lead and responsible agencies under CEQA, you have a responsibility to reject Berggruen's misrepresentations. Accepting Berggruen's misrepresentations would be irresponsible and would set a

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dangerous precedent. Specifically, it would encourage others to make similar claims, and would enable prohibited uses and out of scale development in the Santa Monica Mountains and our public open spaces.

Berggruen also falsely claims that its project will preserve and restore 424.4 acres of open space and make trail improvements. In actuality, irrevocable open space easements over such property were required by the City in exchange for its approval of entitlements to build 29 homes and were subsequently conveyed to the MRCA. Those existing entitlements, easements and related agreements already require open space preservation and trail construction. Berggruen can take no credit for public open space or trails.

Public agencies are required to “independently review and analyze” CEQA documents, and ensure that all CEQA documents reflect their “independent judgment”. The Initial Study and self-serving project description prepared by Berggruen’s lobbyists and paid consultants should plainly be rejected by your agencies.

Thank you for your attention to these matters.

Sincerely,

Kathleen Durbin
MCA President