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[www.hillsidefederation.org](http://www.hillsidefederation.org)



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Department of City Planning

Dec. 8, 2020

Argyle Civic Assn.  
Beachwood Canyon NA  
Bel-Air Assn.  
Bel-Air Hills Assn.  
Bel Air Knolls Property Owners  
Bel Air Skycrest Property Owners  
Benedict Canyon Association  
Brentwood Hills Homeowners  
Brentwood Residents Coalition  
Cahuenga Pass Property Owners  
Canyon Back Alliance  
Crests Neighborhood Assn.  
Dixie Canyon Assn.  
Doheny-Sunset Plaza NA  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland HOA  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Lake Hollywood HOA  
Laurel Canyon Assn.  
LFIA (Los Feliz)  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon NA  
N. Beverly Dr./Franklin Canyon  
Oak Forest Canyon HOA  
Oaks Homeowners Assn.  
Outpost Estates HOA  
Pacific Palisades Res. Assn.  
Residents of Beverly Glen  
Save Coldwater Canyon!  
Save Our Canyon  
Shadow Hills POA  
Sherman Oaks HOA  
Silver Lake Heritage Trust  
Studio City Residents Assn.  
Sunset Hills HOA  
Tarzana POA  
Torreyson Flynn Assn.  
Upper Mandeville Canyon Assn.  
Upper Nichols Canyon NA  
Whitley Heights Civic Assn.

Re: **ENV-2019-4565-EIR Berggruen Institute Project**  
**Request for extension**

Dear Mr. Bertoni:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Notice of Preparation for the Berggruen Institute Project was released just before the Thanksgiving holiday with comments due just before the Christmas and Hanukkah holidays. We respectfully request that a 60-day extension to the comment period be granted for this project.

A number of community members and other interested persons, including some of our member organizations, have respectfully requested the City extend the review and public comment period for the Berggruen Institute Project DEIR due to the profound impacts of the COVID-19 pandemic, including closure of non-essential businesses, many government offices, and public libraries. The request would be entirely reasonable for a project of this magnitude under even ordinary circumstances.

Stakeholders and their representative organizations often rely on initial review of complex projects by technical experts to allow for informed public comment. Due to the impact of COVID-19, including government-ordered closure of non-essential businesses, organizations and individual stakeholders may not be able to find experts who can undertake that review.

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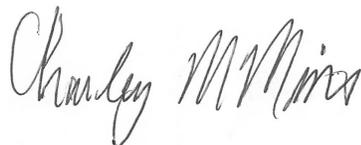
This was not an unforeseeable problem: in March, Sean B. Hecht, UCLA School of Law Professor and Co-Director of UCLA Law's Frank G. Wells Environmental Law Clinic, requested extension of *all* public comment deadlines, citing the negative effect on public participation in review of environmental approvals due to the pandemic.

There is precedent for extending the comment period. The City has used its authority to extend public review and comment deadlines for other projects. For example, the City extended the public comment period for its Citywide Sidewalk Draft EIR “[d]ue to the current COVID-19 emergency” by more than 90 days, from an original deadline of February 24, 2020 to May 31, 2020. Unless extended, the comment period for the Berggruen Institute Project will end on December 21. The 157-day Citywide Sidewalk DEIR comment period is three and a half times the 45-day comment period for the Berggruen Institute Project.

In order for projects to be approved or denied on their merits, members of the public must have sufficient time to make informed public comments. This requires they have real opportunity to review crucial project documents, enlist the help of qualified technical and legal advisors when necessary, consider the issues, and then draft and submit comments. It is unconscionable that such a limited comment period be maintained in light of COVID-19 stay at home restrictions.

Public participation is a fundamental part of the fair and transparent process required by the California Environmental Quality Act. The Federation urges you to grant an extension in order to assure such a fair and transparent process.

Sincerely,

A handwritten signature in cursive script that reads "Charley Mims". The signature is written in black ink and is positioned below the word "Sincerely,".

Charley Mims

cc: Alan Como, Major Projects  
CM Mike Bonin