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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS



DeSoto/Burbank Master Plan

Garm Beall <garm.beall@gmail.com>
To: cpc@lacity.org

Mon, Jun 1, 2020 at 9:49 AM

Dear City Planning Commission,

I oppose the DeSoto/Burbank in its current form because:

1. There were NO public hearings about the project. Because of that, this is clearly a developer who did not seek public input, or who seeks public support. Instead, a back door agreement with an illegal ad hoc committee from our Neighborhood Council and our City Councilman have fast tracked this project, shutting us, the community, out.

2. Your own LA Department of Recreation and Parks did a study of the proposed mega-development and determined that the developer, Adler Realty Investments, should dedicate some (about seven) of the 24 acres for an open-space-format public park. The developer will not build or grant an appropriate park for the public (or residents) to enjoy. When asked about this at a PLUM committee meeting, Adler's response was that people can walk their dogs over to Warner Center park (nearly a mile away). No one in their right mind would agree that is a viable solution. Further, the developer is paying an "in lieu" fee instead of including a park. You can say no to that.

3. The lead architect on the project helped write the Warner Center 2035 Specific Plan. If that isn't self-dealing, I don't know what is. How is that even legal?

4. Why is our City Councilman, who is supposed to represent the voters in his district, trying to fast track this project and skip over public input, practically begging the developer to build at will without any consideration for the community?

Then there are the issues of tree removal (young saplings don't serve the same purpose as established trees), inaccessible landscaping being labeled "open space", traffic mitigation, and so on.

Put the brakes on this project. You can do that. We live here and have not been granted the opportunity to discuss and give input on this mega-development in our backyard.

Sincerely,
Garm Beall
Woodland Hills resident

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155 South El Molino Avenue
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Pasadena, California 91101

VIA E-MAIL ONLY

June 1, 2020

City Planning Commission
City of Los Angeles
201 N. Figueroa Street, 4th Floor
Los Angeles, CA 90012

E-mail Delivery to: cpc@lacity.org

**Re: Agenda Nos. 6 & 7 – Appeal of Warner Center Specific Plan Case
Nos. DIR-2017-1708-SPP and VTT-74891-1A**

Dear President Millman, Honorable Commissioners and Ms. Lamas,

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**,” “**Appellant**” or “**Carpenters**”), my Office is submitting these comments in response to the Staff Report to the Commenter’s Appeal of the City of Los Angeles’ (“**City**” or “**Lead Agency**”) Director of Planning’s (“**Director**”) determination on March 23, 2020 entitled “Warner Center 2035 Specific Plan and Project Permit Compliance Review” for Case No. DIR-2017-1708-SPP, located at 20920 – 20970 W Warner Center Lane, 20935 – 21051 W Warner Center Lane, and 20931 – 21041 W Burbank Boulevard (“**Project**”). (3/23/2020 Letter of Determination re: DIR-Permit Compliance Review [“DIR-PCR LOD”].)

This comment letter is being submitted to support the appeal of the Director of Planning’s March 23, 2020 Letter of Determination (LOD) approving the Project for the Warner Center 2035 Specific Plan, DIR-2017-1708-SPP. (3/23/2020 DIR-PCR LOD.)

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states, including in southern California, and has a strong interest in well-ordered land use planning and addressing the environmental impacts of development projects.

Commenters incorporate by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 CA4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

I. THE CITY FAILED TO GIVE ADEQUATE NOTICE OF ITS SPECIAL MEETING TO COMMENTER/APPELLANT

Los Angeles Municipal Code (“LAMC”) sections 12.24 and 12.36 require the City to provide notice of the public hearing “no less than 24 days prior.” LAMC § 12.24((D)(2), (I)(3).)

The first time Commenter heard about the June 4 CPC hearing was from an email from Mr. Fargo, planner on this case, on Saturday, May 30, 2020, inquiring whether Commenter was submitting presentations for the CPC Special meeting on June 4, 2020. Commenter otherwise never received any official notices, documents, or information about the specially scheduled hearing to hear the appeal filed by Commenter.

The City failed to justify why setting a Special Meeting was necessary, in lieu of a Regular Meeting. In all, Commenter was left scrambling to review a voluminous staff report spanning 800 pages, prepare responses to the Staff Report, and prepare a presentation all in a matter of one day.

The City’s failure to properly notice the Special Meeting unduly burdened Commenter and violates Commenter’s right to administrative due process.

II. THE PROJECT IS INCONSISTENT WITH THE WARNER CENTER 2035 PLAN AND THE LOS ANGELES MUNICIPAL CODE

a. The Project Fails to Comply with the Warner Center 2035 Plan

The primary purpose of the March 23, 2020 LOD is to approve the Project with the determination that it is compliant with the Warner Center 2035 Specific Plan. Los Angeles Municipal Code (“LAMC”) 11.5.7(C)(2) requires that the Director make written findings prior to granting a Project Permit Compliance for Project in a specific plan area. The LOD then analyzes and concludes that the Project is consistent with the applicable general and specific plans, including the Warner Center 2035 Specific Plan. (*Id.* pp. 54-74.)

However, the Project as currently proposed and modified does not comply with the Warner Center 2035 Plan.

1. The City's Acceptance of Applicant's Appeal Renders the Project Inconsistent with the Warner Center 2035 Plan
(a) Revision of DIR Condition 2.d

As specifically explained below, the City accepted Applicant's appeal which rendered the Project inconsistent with the Warner Center 2035 Plan.

First, the Applicant argues in appeal that the last sentence of DIR Condition 2.d should be removed because it would prohibit the concurrent development of multiple phases because it states "No temporary certificate of occupancy shall be issued for a residential building which also contains commercial square footage, unless the commercial component has received a temporary certificate of occupancy prior to, or concurrently with, the residential building component. No building permit shall be issued for the next sequential development phase prior to compliance with this condition." (CPC Staff Report, p. A-12 [emphasis added].)

However, Condition 2.d is consistent with the Specific Plan and is based on a City policy to ensure that the Specific Plan projects are carried out as intended by the Specific Plan. As the City responds, the Specific Plan was intended to prioritize the commercial aspect of the Project (Specific Plan 6.1.2.2. emphasizes that the Commerce District is intended to be the most jobs-rich district). Thus, to carry out the intent of the Specific Plan, the City has previously imposed in another Specific Plan project (ZA-2016-3908-MCUP-DI-SPP) the same condition to prioritize commercial component to achieve the employment / residential balance sought by the Specific Plan.

Despite these Specific Plan requirements, the City accepts Applicant's appeal to remove Condition 2.d (last sentence) that would prohibit the concurrent development of multiple phases. (CPC Staff Report, p. A-12.) This is inconsistent with the Specific Plan's clear requirements and the last sentence of Condition 2.d must be retained.

(b) Revision of DIR Condition 27 re Mobility Fee

The Letter of Determination's DIR Condition 27 correctly applied the Mobility Fee using Appendix D of the Specific Plan, which was amended by Ordinance No. 186,498 (effective March 10, 2020). However, upon Applicant's appeal, the City is

recommending revision of the Letter of Determination to reflect the pre-amendment Mobility Fee to apply, saying the Mobility Fee will be calculated based on the date on which the application was deemed complete. (CPC Staff Report, p. A-20.)

However, the City applies the Mobility Fee Update inconsistently. In another Specific Plan case, Case No. DIR-2018-3394-SPP-1A, Project Site 6366-6410 Canoga Avenue, the City refused to apply the Mobility Fee Update, effective March 10, 2020, to that case because the Letter of Determination for the case was issued on January 2, 2020, before the effective date. (Case No. DIR-2018-3394-SPP-1A, Staff Report to South Valley Area Planning Commission, A-3.) Now, the City says the time for determining whether the Mobility Fee Update applies or not is the date when the application was deemed complete.

Absent statutory exceptions under federal, state or local law, the City's decision as to whether to grant land use entitlements for the Project, are subject to the legal requirements at the time of approval. (*Avco Community Developers, Inc. v. South Coast Regional Com.* (1976) 17 Cal. 3d 785, 793; 793 [stating "the government cannot be estopped to enforce the laws in effect when the permit is issued."]; *Alameda County Land Use Assn. v. City of Hayward* (1995) 38 Cal. App. 4th 1716, 1724 [finding that "A local legislative body cannot surrender or impair its delegated governmental power or that of successor legislative bodies either by ordinance or contract."]; *Trancas Property Owners Assn. v. City of Malibu* (2006) 138 Cal. App. 4th 172, 181 [finding that a City cannot agree not to enforce its current land use and zoning laws, since it would amount to an abdication of a City's "police powers."].)

Moreover, by continuing to approve projects as part of the Warner Center 2035 Plan without ensuring that the revised requirements, like the Mobility fees, will equally apply to all projects as part of the Specific Plan, the City fails to safeguard that the projects within the Specific Plan will be carried out appropriately and consistently.

In sum, the City's revision of Condition 27 to remove the applicability of the Mobility Fee Update renders the Project inconsistent with the Specific Plan.

2. The Project Does Not Comply with the Specific Plan's Cultural Amenities Trust Fund Requirements

The Warner Center 2035 Plan requires that projects with values of over \$500,000.00 pay into the Warner Center Cultural Amenities Trust Fund. (Warner Center 2035

Plan at pp. 15, 43, 111.) The Warner Center 2035 Plan defines “Warner Center Cultural Amenities Fee,” in part, as “[a] fee designed to specify that the cultural arts fees collected into a specific fund, known as the Warner Center Cultural Amenities Trust Fund, to be used for cultural arts and amenities with the Plan area only....” (Warner Center 2035 Plan, pg. 15.)

However, the Project’s Condition of Approval No. 29 merely references the conditional requirements. (Exhibit B to Staff Report.) Since the Letter of Determination admits that this Project would exceed the \$500,000 threshold and the estimated total Cultural Amenities fee will be \$1,982,631.05, the Condition of Approval No. 29 should be revised to state that the Applicant will be assessed Cultural Amenities fees under the Specific Plan because the Project meets the \$500,000 minimum threshold. The current conditional language is confusing.

The Staff Report responds by merely reiterating the Project’s Conditions of Approval and argues that it was sufficient to meet the Warner Center 2035 Plan requirements despite the conditional requirement. (CPC Staff Report, p. A-23.) However, as explained above, the conditional language is confusing and it should be determined at the Project approval state whether the Project will be required to pay the Cultural Amenities fees definitively.

3. The Project Should Be Stayed Until the City Implements City Council’s Direction to Implement Additional Labor Standards, Local Hire, Prevailing Wage, Mobility Fee and Affordable Housing Requirements

The City has recently approved a number of changes to the Warner Center 2035 Plan, including measures to implement labor standards, local hire, prevailing wage, mobility fee and affordable housing requirements (Council Files 13-0197-S4, 13-0197-S9, 13-0197-S6), all of which are currently being ignored as part of the City’s Warner Center 2035 Plan implementation process.

Here, the City initially got it right by applying the calculations from Mobility Fee Update (Ordinance No. 186, 498), with the effective date of March 10, 2020. (Letter of Determination.) However, the City then accepted Applicant’s appeal to apply the pre-amendment Mobility Fee, saying the Mobility Fee will be calculated based on the date on which the application was deemed complete. (CPC Staff Report, p. A-20.)

However, as explained in full above, a project is subject to all legal requirements, including the Mobility Fee update, which is in effect at the time of the Project approval. By failing to apply the Mobility Fee update which has been in effect prior to the Letter of Determination in this case, the City has erred and the Project is now inconsistent with the Specific Plan.

Moreover, by continuing to approve projects as part of the Warner Center 2035 Plan without ensuring that the revised requirements, like the Mobility fees, will equally apply to all projects as part of the Specific Plan, the City fails to safeguard that the projects within the Specific Plan will be carried out appropriately and consistently.

Therefore, the Project is inconsistent with the Warner Center 2035 Plan.

4. The Project Does Not Comply with the Warner Center 2035 Plan's Modification Procedures

The March 23, 2020 LOD acknowledges that Warner Center 2035 Plan Section 5.3.3.2.2 requires any changes to any phase of development which are not substantially compliant with approved plans, including changes to elevations, site plans, orientations, and other design features to a Multiple-Phase Project, shall require a modification to a Project Permit Compliance pursuant to the requirements of LAMC Section 11.5.7-D. (Warner Center 2035 Plan pp. 26-27.)

The Staff Report rebuffs that the modification procedures under Section 5.3.3.2.2. are applicable after initial project approval. (CPC Staff Report, p. A-25.) However, the City entirely ignores the fact that the Project has been revised since the initial application and at the time of IS/MND, without the City explaining in the IS/MND, the Letter of Determination, or any other documents on what those revisions were. (E.g. 3/23/2020 DIR-PCR LOD, pp. 2, 74.) And the City again fails to offer any explanation regarding the Project revision.

Without any explanation or information pertaining to the Project revision, there is no information in the LODS or the IS/MND that adequately describes what revisions were made to the original Project to allow it to tier off of the Programmatic EIR. (See IS/MND for De Soto/Burbank Master Plan Project [ENV-2017-1706-MND]; see Warner Center Regional Core Comprehensive Specific Plan EIR [ENV-2008-3471-EIR].)

Thus, even if this issue may not fall squarely under Warner Center 2035 Plan Section 5.3.3.2.2, it pertains to whether the Project could rely on the IS/MND and the Programmatic EIR for the Warner Center Specific Plan as explained below.

b. The Project Fails to Comply with LAMC 11.5.7(C)

Before granting a Project Permit Compliance request, LAMC 11.5.7(C)(2) requires the Director to make written findings that the Project satisfies each of the following requirements:

- (a) That the project substantially complies with the applicable regulations, findings, standards and provisions of the specific plan; and
- (b) That the project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible

For reasons stated above, the Project is inconsistent with the Warner Center 2035 Plan. Thus, the Director's finding under LAMC 11.5.7(C)(2)(a) is unsupported by substantial evidence. Moreover, due to the failure of the City to disclose and analyze what revisions were to the Project, the Director's finding under both (a) and (b) are unsupported, especially because it is unclear whether the revised Project was adequately analyzed by the IS/MND and can still tier off of the earlier Programmatic EIR.

The City's Staff Report still fails to explain what those modifications (from before to after). (CPC Staff Report, p. A-25, 26.)

Therefore, the Project fails to adequately comply with the Warner Center 2035 Plan's and the LAMC's required procedures for Project modification/revision.

III. THE PROJECT VIOLATES THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

a. **Background Regarding the California Environmental Quality Act**

The California Environmental Quality Act, Cal. Pub. Res. Code § 21100 *et seq* ("CEQA") has two basic purposes. First, CEQA is designed to inform decision

makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations (“**CCR**” or “**CEQA Guidelines**”) § 15002(a)(1). “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’ [Citation.]” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal.3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” *Berkeley Jets*, 91 Cal.App.4th 1344, 1355 (emphasis added) (quoting *Laurel Heights*, 47 Cal.3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. (*Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v.*

County of Madera (2011) 199 Cal.App.4th 48, 102, 131.) As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449–450).

b. The Project Requires a Site Specific EIR, Not an IS/MND

As explained above, the Project must be consistent with the Warner Center 2035 Plan to rely on the prior Initial Study/Mitigated Negative Declaration (IS/MND) and tier off of a prior Programmatic EIR. (See IS/MND for De Soto/Burbank Master Plan Project [ENV-2017-1706-MND]; see Warner Center Regional Core Comprehensive Specific Plan EIR [ENV-2008-3471-EIR].)

Tiering is only appropriate when an EIR has been certified for a program, plan, policy, or ordinance under PRC § 21904(a) and the later project is consistent with the program, plan, policy, or ordinance pursuant to PRC § 21904(b)(1) and CEQA Guidelines § 15152(d). Moreover, the later project must be consistent with the applicable general plan pursuant to PRC § 21904(b)(2) and CEQA Guidelines § 15152(e).

Here, not only is the Project inconsistent with the Warner Center 2035 Plan, it also has been revised which rendered it different from how it was envisioned and analyzed in the Programmatic EIR.

The City disputes Commenter's argument that the Project is inconsistent with the Warner Center 2035 Plan for the specific reasons as laid out in the previous sections. However, each of these points are explained in full above.

More critically, revisions were made to the Project which were not amply analyzed or discussed in the IS/MND and the 3/23/2020 LOD. Moreover, these revisions negate the City's ability to tier off of the earlier Programmatic EIR, which the City fails to explain fully.

With undeterminable revisions made for the Project, substantial evidence no longer supports the City's reliance on the IS/MND and the Programmatic EIR in approving the Project.

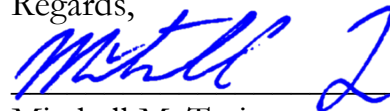
c. The Project Facially Does Not Qualify for a Statutory Exemption from CEQA

The 3/23/2020 LOD mistakenly cited to California Government Code Section 65457 as "California Public Resources Code (California Environmental Quality Act) in an effort to claim an exemption from CEQA. The Staff Report admits that the Project is not subject to a statutory exemption and states that the Project documents will be reflected to not include any mention of a CEQA exemption.

IV. CONCLUSION

For aforementioned reasons, Commenter requests that the City grant its appeal and send the Project back to be re-analyzed and considered for its consistency with the Warner Center 2035 Plan and compliance with CEQA.

Regards,



Mitchell M. Tsai

MITCHELL M. TSAI, ATTORNEY AT LAW



Planning CPC <cpc@lacity.org>

Fwd: De Soto/Burbank Master Plan

Tim Fargo <Tim.Fargo@lacity.org>
To: Peter Colley <peter@petercolley.com>
Cc: Planning CPC <cpc@lacity.org>

Mon, Jun 1, 2020 at 9:43 AM

Hello Mr. and Mrs. Colley:

I am copying the Commission office on your email so that it can be conveyed to the decision makers.

Thank you,



Tim Fargo, Ph.D.
City Planner - Project Planning
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----- Forwarded message -----

From: **Peter Colley** <peter@petercolley.com>
Date: Fri, May 29, 2020 at 6:08 PM
Subject: RE: De Soto/Burbank Master Plan
To: tim.fargo@lacity.org <tim.fargo@lacity.org>

Dear Dr. Fargo:

My wife and I are 33-year residents of Woodland Hills and are deeply concerned with the impact of some of the planned developments. We hear the Promenade mega-project has just been approved and now we have the De Soto/Burbank mega-project.

We are not opposed to development at a scale that keeps an area liveable, but there has not been an extra road or lane added during our 33 years here, and the street plan is the same since the 101 was built in 1960.

Before the pandemic it could take us an hour and a half to get to downtown LA in the evening and the 101 during rush hour is already infamous as one of America's most clogged. Some intersections in Woodland Hills are already heavily jammed at busy times. To add thousands of vehicle trips a day really would turn this area into the Manhattan of the valley, ie gridlock, pollution etc.

This is also the hottest part of the San Fernando Valley, often being the hot spot on the weather report, and recent years have been even hotter. An overly intense development would add to that heat trap. We are also told that this area is known for liquefaction and, having lived

6/2/2020

City of Los Angeles Mail - Fwd: De Soto/Burbank Master Plan

through the Northridge quake, that is a concern.

We support the lower density alternatives these mega-developments keep this area liveable.

Sincerely,

Peter & Ellen Colley



Desoto/Burbank Master Plan Project

Paul Thorne <pdthorne@ymail.com>

Mon, Jun 1, 2020 at 8:01 PM

To: "cpc@lacity.org" <cpc@lacity.org>, "councilmember.blumenfield@lacity.org" <councilmember.blumenfield@lacity.org>

To; Los Angeles City Planning Commission

Dear Commissioners,

We write to express our many concerns and those of our family regarding the so called Desoto/Burbank Master Plan.

As it is obvious, it seems redundant to mention that our community does not want to model itself after downtown Los Angeles. As we write Ventura Boulevard is being boarded up. Polachek's Jewelers and so many businesses that serve our area are boarded up! We are under a second night of curfew due to ongoing looting and rioting, which fortunately is much less severe here than it is in the Westside or Downtown. All this on top of our now two and a half month "Safer at Home" order. Who could imagine what a future quarantine would mean for this new version of the west San Fernando Valley if we again are forced into a military state type situation and the area population is increased (as the plan dictates) to over 100,000 people. We can't imagine the pandemonium of that kind of population density here!

We have overheard meetings regarding the Promenade project and others surrounding the 2035 plan area and are familiar with the thought processes which guide much of the planning commissions desires. We have also met with Councilman Bob Blumenfield. And while he was very attentive to our opinions at the time, and forthcoming, we believe on this project there seems to be an effort to railroad this through the process with minimal input from the local community, as if it is obvious that this is not an "improvement" to the community that exists around Warner Center (aka Woodland Hills and Canoga Park) but a complete change in its character, as if there is something wrong with it.

You have heard appeals (with which we totally agree.) They state basically that the proposed plan to remodel the area is not taking into account the actual needs of the community at large. The removal of trees, the lack of any infrastructural improvements to mitigate the disastrous traffic which will result; the lack of police and fire coverage. The environmental concerns and access issues. And last but not least for sure the lack of affordability for residents so they can participate in this "revitalization" effort. We don't believe that the addition of so many square feet of office makes any sense at all. There are no tenants, and it fanciful to believe they will magically appear and the thrusting height of the towers not only ignore modern concerns like Covid-19 has introduced but are intrinsically in our opinion ugly and aggressive. Not to mention the removal of a current development which after only 40 years is now considered unworthy of our community.

The fact is, we live here (since the late 60s) because we love it the way it is. We have enjoyed for decades the West Valley's sub-sub-urban lifestyle. We have been forced just recently to witness unbridled and over-massive development now for several years, and we have no choice to become neighbors to huge swathes of giant apartment/condo "villages" not growing out of any need of the community but, it seems, more out of the need for Los Angeles politicians, and developers from the world over to feed on our beautiful uncrowded spaces. As one commissioner put it last week '... These developments will serve to put the South San Fernando Valley "on the map." He all but suggested that we need to think of ourselves as DTSFV in Woodland Hills, and implied (as did several others) that this as if we were having a huge gift bestowed on us. Well we respectfully as you to offer it to someone else, please. Nobody we know who grew up in our beautiful bedroom community think of this as a worthy gift. We are still trying to help figure out what to do with the huge increase in unsheltered folk who we assume are not considered in this plan.

We believe that if this project is to go through it must be downsized, improved upon, re-imagined with a vision toward serving and protecting the future of our current residents, and not designed to wish them away and replace them with a new kind of community which serves the interest of a few political and financial interests. We ask for at least a delay in the process to consider these concerns and to get more feedback from the community.

Thanks you for your attention.

Paul and Laura Thorne

DAY OF HEARING SUBMISSIONS