



Westside
Regional
Alliance of
Councils

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Bel Air-Beverly Crest Neighborhood Council
Brentwood Community Council
Del Rey Neighborhood Council
Mar Vista Community Council
Neighborhood Council of Westchester-Playa
North Westwood Neighborhood Council
Pacific Palisades Community Council

Palms Neighborhood Council
South Robertson Neighborhoods Council
Venice Neighborhood Council
West LA-Sawtelle Neighborhood Council
Westside Neighborhood Council
Westwood Community Council
Westwood Neighborhood Council

January 9, 2024

Hon. Karen Bass, Mayor, City of Los Angeles
Vincent P. Bertoni, AICP, Director, Los Angeles Dept. of City Planning
Hon. Traci Park, LA City Councilwoman, Council District 11
Hon. Katy Yaroslavsky, LA City Councilwoman, Council District 5
Hon. Nithya Raman, LA City Councilwoman, Council District 4
Hon. Heather Hutt, LA City Councilwoman, Council District 10

Via email to all addressees

Re: CEQA Noise Thresholds – Proposed Changes

Dear Mayor Bass, Director Bertoni and Councilmembers Park, Yaroslavsky, Raman and Hutt:

The Westside Regional Alliance of Councils (WRAC) is a cooperative coalition, founded in 2009, of all fourteen neighborhood and community councils on the Westside of Los Angeles located in CDs 5 and 11 and portions of CDs 4 and 10. WRAC Member Councils collectively represent approximately 500,000 Angelenos.

We bring to your attention WRAC’s Statement of Principles (Standing Rule 4 to the WRAC Bylaws), which provide in pertinent part:

“WRAC expects governing bodies to notify all relevant parties -- including relevant WRAC Member Organizations – of all . . . proposed new planning and zoning codes and regulations and/or proposed changes to existing codes and regulations. Such notice should be provided sufficiently in advance of the governing body’s determination to allow ample time for WRAC Member Organizations to consider, review and comment on the proposal.”
[\(https://westsidecouncils.com/bylaws/\)](https://westsidecouncils.com/bylaws/)

It is fundamental to a respectful and responsive relationship between the City, local councils and the communities they represent, that before any decision is reached on changes to existing rules proposed by the Planning Dept. or other City officials (which clearly impact our communities), governing officials provide WRAC Member Councils with adequate notice and **sufficient opportunity to meaningfully comment** – including WRAC’s certified Neighborhood Councils as well as its respected and established Community Councils (which, as the City Council officially recognized in 2014 in Council File No. 13-1625, serve the same function in their communities).

Although WRAC has not yet taken a specific position on the Planning Dept.’s recent proposal to change the CEQA Noise Thresholds (the Proposal), we emphasize our serious concern and insist that the process must comply with WRAC’s Statement of Principles, *to provide ample time for meaningful review and comment.*

WRAC first received notice of the Proposal via email on December 13, 2023, with a hearing noticed for December 20 (one week later) and an *initial comment deadline on the same date*. It has now come to our attention that during the hearing, the comment deadline was apparently extended to January 19, 2024.¹ This

¹ We note that there has been *no written notice of this extended deadline*, nor can we find any notice of the Proposal on the Planning Dept.’s website. These omissions are concerning, as is the fact that apparently, the Planning Dept. proposes to implement significant changes in CEQA guidelines independently, *without review or approval by the Planning Commission, the Council PLUM Committee, or the full Council.*

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notice was entirely inadequate to provide ample time for meaningful review and comment.

Most of our WRAC Member Councils did not meet in December due to the busy holiday period – a time when many community leaders and constituents are away or otherwise unable to study serious proposals such as this one, let alone to attend hearings on one week’s notice only a few days before the Christmas weekend. The extension to January 19 (*assuming the comment deadline was in fact extended at the December 20th hearing*) is also unrealistic and inadequate. Several of our Member Council boards do not meet in 2024 until *after* January 19, and most have a policy of *first referring substantial Planning proposals (such as this one) to their respective land use & planning committees* for review and vetting before considering recommendations for board action. As a practical matter, there is simply no time for adequate review or comment by January 19, 2024.

WRAC therefore respectfully requests that the Los Angeles Dept. of City Planning extend the deadline for comment on the Proposal by at least 60 days – the time necessary for adequate study by WRAC’s Member Councils and to allow them to provide meaningful comment on the Proposal. We further urge Councilmembers who represent our Member Councils (CMs Park, Yaroslavsky, Raman and Hutt) to request such an extension from the Planning Dept.

Thank you for your consideration and attention to this important matter.

Sincerely,

Robin Greenberg and Christina Spitz

Robin Greenberg, Chair

Christina Spitz, Vice-Chair

Westside Regional Alliance of Councils

cc (*via email*):

Lisa Webber, AICP, Deputy Director of Project Planning, LA Dept. of City Planning

Arthi Varma, Deputy Director of Citywide Policy Planning, LA Dept. of City Planning

Mindy Nguyen, Senior City Planner, LA Dept. of City Planning

Marian Ensley, West LA Representative of Community Engagement, Mayor Bass

Juan Fregoso, District Director, Councilwoman Park

Jeff Khau, Planning Deputy, Councilwoman Park

Michael Amster, Field Deputy, Councilwoman Park

George Hakopiants, District Director, Councilwoman Yaroslavsky

Jennifer Torres, Planning Deputy, Councilwoman Yaroslavsky

Cairo Rodriguez, Field Deputy, Councilwoman Yaroslavsky

Armida Reyes, Housing & Planning Deputy, Councilmember Raman

Hakeem Parke-Davis, Deputy for Planning, Councilwoman Hutt