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June 16, 2014

**VIA E-MAIL (sharon.gin@lacity.org) AND U.S. MAIL**

Hon. Jose Huizar, Chair  
Hon. Gilbert Cedillo  
Hon. Mitchell Englander  
City of Los Angeles, Planning and Land Use Management Committee  
200 N. Spring Street, Rm. 395  
Los Angeles, CA 90012  
Attn: Sharon Gin, Legislative Assistant

Re: Council File 14-0617  
VTT-71898-CN-A1  
DIR-2012-1112-DB-A1  
ENV-2012-1111-MND-REC1  
11965-11973 W. Montana Avenue  
Additional Response to Appellants

Dear Chair Huizar and Honorable Members of the Planning and Land Use  
Management Committee:

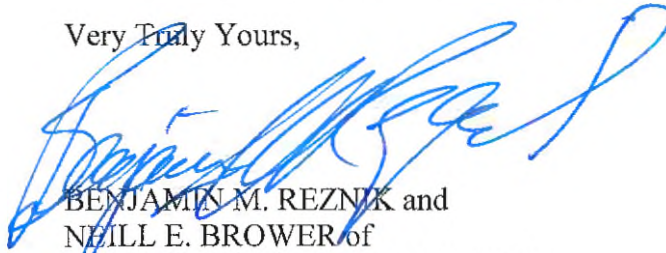
We represent Montana Bundy LLC, the owner of the above-referenced properties (the "Properties") and applicant for the above referenced approvals (collectively, the "Project"), which the City Planning Commission properly sustained. We write to provide additional information to supplement our letter of June 12, 2014 concerning the Mitigated Negative Declaration ("MND") for the Project. Our previous letters to the Planning and Land Use Management ("PLUM") Committee and to the Planning Commission discussed the substantial evidence demonstrating the procedural and substantive adequacy of the MND, as well as the numerous errors and misunderstandings that suffused the Appellant's comments.

Among other issues, the Appellants incorrectly claimed that the conclusions of the MND regarding the Project's less-than-significant air quality and greenhouse gas ("GHG") impacts were not supported by substantial evidence. Consequently, in further response to Appellant's comments on those impacts, and in addition to the data and analysis presented in the MND, staff reports, and Planning Commission determinations, we attached a supplemental air quality and GHG analysis. As the attached analysis further demonstrates, the Project would not result in any significant air quality or GHG impact. Moreover, ***the Project create about 1/100th to 1/10th of the emissions necessary to trigger a potentially significant impact***, even without accounting for mitigation measures that could further reduce those emissions.

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As described in detail in our prior letters, the attachment to this letter, and the City's Appeal Staff Reports, the conclusions of the MND—that the Project would not cause a significant impact—were and remain supported by substantial evidence. The Appellant has failed to substantiate a fair argument that an undisclosed significant impact would occur. Therefore, in accordance with City staff recommendations, the appeals to the Density Bonus and Tract Map determinations have no substantial basis and the PLUM Committee should deny them.

Very Truly Yours,



BENJAMIN M. REZNIK and  
NEILL E. BROWER of  
Jeffer Mangels Butler & Mitchell LLP

BMR:neb

cc: Via e-mail:

Hon. Mike Bonin, Councilmember, CD11  
Chris Robertson, Planning Director, Current Planning, CD11  
Kevin Ocubillo, Planning Deputy, CD14  
Gerald Gubatan, Senior Planning Deputy, CD1  
Hannah Lee, Chief Planning & Land Use Deputy, CD12  
Jose Carlos Romero-Navarro, Department of City Planning