



Wednesday, May 5, 2021

BY EMAIL ONLY

Mr. Paul Novak
Hearing Officer
Planning & Community Development Department
City of Pasadena
100 North Garfield Ave.
Pasadena, CA 91101

Re: Objection to Application for CUP #6577 to Establish a “Park and Recreation Facility.”
Hearing Date: May 5, 2021.

Dear Mr. Novak:

My office represents 8129 Wierfield Drive, LLC, which owns ten parcels adjacent to the land that is the subject of the above-referenced CUP application. The purpose of this letter is to object to the issuance of the CUP because of the negative impacts that it would have on my client.

The specific parcels that my client owns are:

1. 5707-016-022;
2. 5707-016-037;
3. 5707-016-038;
4. 5707-016-39;
5. 5707-016-040;
6. 5707-016-041;
7. 5707-017-024;
8. 5707-017-025;
9. 5707-017-026; and
10. 5707-017-027.

These parcels (the “Property”) consist of vacant land adjacent to the proposed project, and they provide approximately 1.5 acres of flat land. Our concern is that people who want to use the proposed “Park and Recreation Facility” (the “Facility”) will use the Property for parking, will litter on the Property and may use the Property to relieve themselves. Furthermore, the possibility of one of the prospective trespassers being

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injured on the Property creates significant additional risk for my client. The City's current CUP application does not take into account any of those detriments to my client.

The above concerns are exacerbated by the fact that the City only intends to provide six official parking spaces for the Facility, one of which will be a restricted ADA space. That amount of parking is very likely to be insufficient, and overflow attendees will therefore seek out additional parking nearby. My client's adjacent vacant land is likely to be their first choice. Further exacerbating the problem is the fact that the City intends to install a gate to prevent after-hours access to the Facility. The plan to install a gate recognizes the likelihood that individuals will attempt to access the Facility after-hours. What does the City think those people are going to do when they get to the gate and find that they cannot park in the designated parking lot? Obviously, some of them are going to instead park on my client's adjacent Property, which brings with it all of the associated risks previously enumerated.

For the foregoing reasons, my client objects to the issuance of the requested CUP and invites the City to engage in the kind of meet and confer process that it should have engaged in before applying for the permit. My client is open to reaching an agreement on appropriate accommodations to mitigate its risk, and I believe that we can reach such an agreement. However, if the City moves forward without properly addressing the risks it is creating for my client, then litigation will most likely be required.

Best regards,

A handwritten signature in black ink, appearing to read "A. Blackburn". The signature is fluid and cursive, with a large initial "A" and "B".

Alexander C. Blackburn