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VIA ELECTRONIC & U.S. MAIL

December 22, 2016

Holly L. Wolcott, City Clerk
200 North Spring Street
City Hall – Room 360
Los Angeles, CA 90012
Em: CityClerk@lacity.org

2016 DEC 27 PM 4:10
CITY CLERK

RE: Notice of Intent to File Suit Under the California Environmental Quality Act
Regarding The Reef Project.

Dear Ms. Wolcott,

My Office is writing on behalf of SAJE (“Petitioner”), regarding the Reef Project, a proposed mixed-use development that proposes to build 549 residential apartment units, 895 condominium units, 69,400 square feet of retail uses, 35,657 square feet of restaurant / bar uses, and a 208-key hotel on a 9.6 acre site located at 1900 South Broadway, Los Angeles, California (collectively, “Project”).

Please take notice, pursuant to Public Resources Code (“PRC”) § 21167.5, that Petitioners intend to file a Verified Petition for Peremptory Writ of Mandate and Complaint for Declaratory and Injunctive Relief (“Petition”), under the provisions of the California Environmental Quality Act (“CEQA”), Public Resources Code § 21000 et seq., against Respondent and Defendant City of Los Angeles, Los Angeles City Council, and the Los Angeles Department of City Planning (collectively “City”) challenging the unlawful actions taken by the City on November 22, 2016, in (1) approving the Project and posting the related Notice of Determination (“NOD”) in violation of CEQA; and (2) failing to prepare an adequate CEQA document for the Project.

The petition being filed will seek the following relief:

- A. For a writ of mandate commanding Respondent to vacate and withdraw the certification of the EIR/EIS and any purported approvals of the Project, and to require Respondents to complete the CEQA environmental review and public comment period as required by law;
- B. For a temporary stay, temporary restraining order, and preliminary and permanent injunctions enjoining Respondent and Real Parties in Interest, and their agents, employees, officers or representatives, and all persons acting in concert or participating with Real Parties in Interest from taking any action to

implement the project, unless and until Respondent fully complies with CEQA and NEPA;

- C. For a declaration of the rights and duties of the parties hereto, including but not limited to a declaratory judgment that Respondent violated its duty pursuant CEQA by certifying the EIR/EIS, issuing a Notice of Determination, curtailing the required public comment period, and purporting to approve the project and that the approval for the project, including the environmental document, are null and void and without legal effect;
- D. For petitioners' fees and costs, including reasonable attorneys' fees and costs, as authorized by California Code of Civil Procedure section 1021.5 and any other applicable provisions of law; and
- E. For such other relief as this Court deems appropriate and just.

Petitioners urge Respondents to rescind the Notice of Determination for the Project, as well as the existing Project approvals, and prepare the appropriate CEQA document for this Project as required by law.

Very Truly Yours,



Mitchell M. Tsai
Attorneys for SAJE

PROOF OF SERVICE

I, Toni Walton, declare as follows:

I am a resident of the State of California, and employed in Pasadena, California. I am over the age of 18 years and am not a party to the above-entitled action. My business address is: 350 West Colorado Boulevard, Suite 225, Pasadena, California 91105

On December 22, 2016, I served a copy of the foregoing document(s) entitled:

Notice of Intent to File Suit Under the California Environmental Quality Act Regarding The Reef Project.

on the following parties:

Holly L. Wolcott, City Clerk
200 North Spring Street
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By depositing a true and correct copy in a sealed envelope with the United States Postal Service with postage fully prepaid as well as by electronic service, via either electronic transmission or notification.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed December 22, 2016 at Pasadena, California.



Toni Walton