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VIA ELECTRONIC & U.S. MAIL

January 20, 2023

Celia Zavala, Executive Officer
Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012
Em: executiveoffice@bos.lacounty.gov

Supervisor Hilda Solis, District 1
Los Angeles County Board of
Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 856
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Em: firstdistrict@bos.lacounty.gov

Supervisor Lindsey P. Horvath, District 3
Los Angeles County Board of
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500 West Temple Street, Room 821
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Supervisor Kathryn Barger, District 5
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Bruce Durbin
Supervising Regional Planner
Department of Regional Planning
320 West Temple Street
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Em: ordinance@planning.lacounty.gov

Supervisor Holly J. Michell, District 2
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Supervisor Janice Hahn, District 4
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Kenneth Hahn Hall of Administration
500 West Temple Street, Room 822
Los Angeles, CA 90012
Em: FourthDistrict@bos.lacounty.gov

RE: Notice of Intent to File Suit Under the California Environmental Quality Act

Dear Sirs/Madams:

I am writing on behalf of the following parties:

- 1) Fiber First Los Angeles;
- 2) Mothers of East LA;
- 3) Union Binacional de Organizaciones de Trabajadores Mexicanos Exbraceros 1942-1964;
- 4) Boyle Heights Community Partners;
- 5) California Fires & Firefighters;
- 6) Malibu for Safe Tech;
- 7) EMF Safety Network;
- 8) Californians for Safe Technology;
- 9) 5G Free California; and
- 10) Children’s Health Defense.

The above parties are a collection of public interest organizations and Los Angeles County residents (collectively “**Petitioners**”). On behalf of Petitioners, this office is contacting you regarding the County of Los Angeles’ (“**Respondent**”) action on January 10, 2023 and all subsequent actions approving the ordinance amending Title 16 – Highways and Title 22 – Planning and Zoning of the Los Angeles County Code, including any revisions and/or amendments thereto (hereinafter “**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**”), PRC §§ 21000, *et seq.*, against Respondent challenging the unlawful actions taken by Respondent in approving the Project. Petitioner may also file the Petition for violations of other state and/or local laws.

The Petition being filed will seek the following relief:

- A. For a writ of mandate commanding Respondent to vacate and withdraw the approval of the Project, and to require Respondent to comply with CEQA;
- B. For a temporary stay, temporary restraining order, and preliminary and permanent injunctions enjoining Respondent, and its agents, employees, officers and/or representatives, from taking any action to implement the Project, unless and until Respondent fully complies with CEQA;
- 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 to CEQA;
- 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 the Court deems appropriate and just.

Sincerely,



Mitchell M. Tsai

Attorneys for Petitioners

PROOF OF SERVICE

I, Steven Thong, declare as follows:

I am a resident of the State of California and am over the age of 18 years. My business address is: 139 South Hudson Avenue, Ste. 200, Pasadena, California 91101. On January 20, 2023, I served a copy of the foregoing document(s) entitled:

Notice of Intent to File Suit Under the California Environmental Quality Act

on the following parties:

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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; and
- by electronic service, via electronic transmission, to the email addresses specified above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 20, 2023 in Los Angeles, California.



Steven Thong