



September 15, 2020

By E-mail

Hon. Mike Bonin
Councilmember, CD-11
Room 395, City Hall
200 N. Spring Street
Los Angeles, California 90012

Hon. Mike Feuer, City Attorney
Terry Kaufmann Macias, Senior Assistant City Attorney
Charles D. Sewell, Deputy City Attorney
Patrick Hagan, Deputy City Attorney
200 N. Main Street
Los Angeles, California 90012

Re: Sullivan Equity Partners, LLC v. City of Los Angeles, et al., Los Angeles Superior Court case #BS169541; City Council File Number 20-0558 ("Namvar")

Dear Councilmember Bonin and City Attorney Feuer,

I am the President of Brentwood Hills Homeowners Association (Brentwood Hills). I am writing with respect to the proposed development by Sullivan Equity Partners (SEP) in Sullivan Canyon, and the need to send the matter back for a new hearing to address the egregious violations of the City's Protected Tree Ordinance and the other violations committed by SEP and its principals and managers in connection with this project. Brentwood Hills opposes any settlement between the City and SEP that would allow this project to proceed without a new hearing to address these violations and to enforce the City's Protected Tree Ordinance, Baseline Hillside Ordinance and other applicable City ordinances and requirements.

By way of background, Brentwood Hills is a community of about 450 single-family homes along the western ridge of Mandeville Canyon. The SEP project lies directly below streets and residences in Brentwood Hills' territory, and many residents of Brentwood Hills use the trails that go down from Queensferry to Old Ranch Road. Brentwood Hills has a strong interest in protecting the heritage trees, trails, wildlife and sensitive environment in and around the Santa Monica Mountains, including in Sullivan Canyon.

We have read—and fully endorse and adopt—the June 8 letters in the record to each of you from Dean Wallraff on behalf of Advocates for the Environment and the residents of Old Ranch Road. We also have read and endorse the June 8 letter from the Hillside Federation, the June 9, 2020 letter from Paul Edelman, Deputy

Director of the Santa Monica Mountains Conservancy, and the September 10 letter from the Sierra Club Santa Monica Mountains Task Force.

Any settlement with SEP that permits the project to go forward without a new application and hearing would undermine the City's Protected Tree Ordinance (PTO) by showing that the City is unable to properly enforce its penalty provisions. We realize that SEP is threatening the City with damages. But SEP's damages claims are weak, and are best countered by rehearing the developer's PTO violations with appropriate due process. We believe this process will demonstrate that SEP's egregious conduct has violated the PTO and the violation is serious enough that its grading and building permits should be revoked. Reaching that conclusion following a new hearing with appropriate due process protections will eliminate any argument by SEP that the final result of the City's enforcement was based on an unfair hearing. This is the outcome SEP deserves, and is best way to protect the City and the PTO.

Sincerely,



Michael R. Leslie
Vice President and Board Member,
Brentwood Hills Homeowners Association

Cc: Brentwood Hills Board of Directors
Hillside Federation
Dean Wallraff