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January 11, 2019

Via Email and U.S. Mail:

Susan Neer, City Clerk  
City of Livermore  
City Hall  
1052 S. Livermore Ave.  
Livermore, CA 94550  
[smneer@cityoflivermore.net](mailto:smneer@cityoflivermore.net)

Steve Stewart  
Planning Manager  
City of Livermore  
1052 S. Livermore Avenue  
Livermore, CA 94550  
[planning@cityoflivermore.net](mailto:planning@cityoflivermore.net)

Via Email Only:

Kelley Halverson  
[kjhalverson@cityoflivermore.net](mailto:kjhalverson@cityoflivermore.net)

Re: Request for Immediate Access to Documents Referenced in the Mitigated Negative Declaration – Prologis Distribution Center @ Jack London Boulevard & Isabel Avenue (SPDR18-002).

Dear Ms. Neer, Mr. Stewart and Ms. Halverson:

We are writing on behalf of **Livermore Residents for Responsible Development** (“Livermore Residents”) to request *immediate access* to any and all documents referenced or relied upon in the Mitigated Negative Declaration (“MND”) prepared for Prologis Distribution Center @ Jack London Boulevard & Isabel Avenue, SPDR18-002 (“Project”) by Prologis (“Applicant”), pursuant to the California Public Records Act (“PRA”) <sup>1</sup> and California Constitution. This request *excludes* any documents that are otherwise available on the City’s websites. <sup>2</sup> The project is located at South West quadrant of Jack London Blvd., and Isabel Ave., Livermore (APN: 904-0005-002-24).

<sup>1</sup> Gov. Code § 6253(a) and §§ 6250 et seq.

<sup>2</sup> <http://www.cityoflivermore.net/citygov/cdd/planning/enviro.htm>  
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Livermore Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards and environmental impacts of the Project. The association includes: City of Livermore residents; the International Brotherhood of Electrical Workers Local 595, Plumbers & Steamfitters Local 342, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483 and their members and their families; and other individuals that live and/or work in the City of Livermore and Alameda County.

Our request for all documents referenced or relied upon in the MND is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced in an environmental review document be made available to the public for the entire comment period.<sup>3</sup> *This request excludes a copy of the MND for the Project.*

We request *immediate access* to review the above documents pursuant to section 6253(a) of the Public Records Act, which requires public records to be "open to inspection at all times during the office hours of the state or local agency" and provides that "every person has a right to inspect any public record." Gov. Code § 6253(a). Therefore, the ten-day response period applicable to a "request for a copy of records" under Section 6253(c) does not apply to this request.

Pursuant to Government Code section 6253.9, if the requested documents are in electronic format, please send them to us via a file transfer program such as Dropbox. Alternatively, if the documents are 10 MB or less (or can be easily broken into chunks of 10 MB or less), please email them to [jlaurain@adamsbroadwell.com](mailto:jlaurain@adamsbroadwell.com) as attachments. If any of the requested items are available on the Internet, we request that the City direct us to the appropriate electronic link(s) for accessing the documents.

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<sup>3</sup> See Pub. Resources Code, § 21092, subd. (b)(1); 14 Cal. Code Reg. § 15072, subd. (g)(4).  
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Please use the following contact information for all correspondence regarding these requests:

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South San Francisco, CA 94080  
[jlaurain@adamsbroadwell.com](mailto:jlaurain@adamsbroadwell.com)  
Phone: (650) 589-1660

Thank you for your assistance with this matter.

Sincerely,

Janet Laurain  
Paralegal

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