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*Admitted in Colorado

December 6, 2019

Via Email and U.S. Mail

LaTonda D. Simmons, City Clerk
City of Oakland
One Frank H. Ogawa Plaza
First and Second Floors
Oakland, CA 94612
Email: lsimmons@oaklandnet.com

William Gilchrist
Director, Planning & Building
City of Oakland
250 Frank H. Ogawa Plaza
Suite 2114
Oakland, CA 94612
Email: wgilchrist@oaklandnet.com

Via Email Only

Pete Vollmann, PVollmann@oaklandca.gov

Re: Public Records Act Request – 88 Grand Avenue Project (PLN18406)

Dear Ms. Simmons, Mr. Gilchrist and Mr. Vollmann:

We are writing on behalf of **Oakland Residents for Responsible Development** (“Oakland Residents”) to request any and all public records referring or related to the 88 Grand Avenue Project (“Project”) by KTG Architecture (“Applicant”), ***since the date of our last request on July 19, 2019.*** This request includes, but is not limited to, any and all file materials, correspondence, resolutions, memos, notes, analysis, staff reports, electronic mail messages, files, maps, charts, and/or any other documents related to the Project.

We are making this request pursuant to the California Public Records Act (“Act”),¹ and request the above documents pursuant to section 6253(a) of the Act. In addition, we request these materials pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to

¹ Gov. Code, §§ 6250, et seq.
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information concerning the conduct of the government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information be narrowly construed.

In addition to all public records since our July 19, 2019 request, we specifically seek the following documents that were identified in the City's September 19, 2019 Public Records Act response, but were not included:

- 4 RE_88 Grand – DRC Submittal #2.pdf (email dated June 7, 2019), which has a link to “88 Grand Submittal” with goes to a folder, 2019-06-06 - City Submittal #2, which does not open.
- 20 RE_88 Grand - DRC submittal #2.pdf (email dated June 5, 2019), which has a link to which has a link to “88 Grand Submittal” which goes to a folder, 2019-05-23 - City Submittal #2, which does not open.

If any of the requested documents are available in electronic format, please send them to us using a file transfer program such as Dropbox. If the electronic documents are 10 megabytes (MB) or less (or can be broken into chunks of 10 MB or less), please email them as attachments. We reserve the right to have a copy service make copies of any and all of the requested documents depending on the volume.

Oakland 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 Oakland 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 Oakland and Alameda County.

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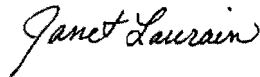
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Please use the following contact information for all correspondence regarding these requests:

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601 Gateway Boulevard, Ste. 1000
South San Francisco, CA 94080
jlaurain@adamsbroadwell.com
Phone: (650) 589-1660

Thank you for your assistance with this matter.

Sincerely,



Janet Laurain
Paralegal

JML:lj1

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