

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1880
FAX (650) 589-6082

sbennadan@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201
FAX: (916) 444-6209

DANIEL L. CARDOZO
CHRISTINA M. CARO
YAIR CHAVER
SARA F. DUDLEY
THOMAS A. ENSLOW
TANYA A. GULESSERIAN
KYLE C. JONES
RACHAEL E. KOSS
NIRIT LOTAN

MARC D. JOSEPH
Of Counsel

March 28, 2019

VIA EMAIL AND U.S. MAIL

Maryam Babaki, Director of Public Works & Development Services
City of Commerce
2535 Commerce Way
Commerce, CA 90040
Email: MBabaki@ci.commerce.ca.us

Angie Verdin, Deputy City Clerk
Office of the City Clerk
City of Commerce
2535 Commerce Way
Commerce, CA 90040
Email: angiev@ci.commerce.ca.us

VIA EMAIL ONLY

Noel Tapia, City Attorney
Email: NTapia@ci.commerce.ca.us

Manual Acosta, Contract Planner
Email: MAcosta@ci.commerce.ca.us

Rene Bobadilla, Assistant City Administrator
Email: RBobadilla@ci.commerce.ca.us

Re: Request for Immediate Access to Documents Referenced in the Recirculated Draft Environmental Impact Report – Citadel Outlets Expansion & 10-Acre Development Project (SCH No. 2016091024)

Dear Ms. Babaki, Ms. Verdin, Mr. Tapia, Mr. Acosta, and Mr. Bobadilla:

We are writing on behalf of Coalition for Responsible Equitable Economic Development ("CREED LA") to request immediate access to any and all

4571-005acp

March 28, 2019

Page 2

documents referenced or relied upon in the *recirculated* Draft Environmental Impact Report ("DEIR") prepared for the Citadel Outlets Expansion & 10-Acre Development Project (SCH No. 2016091024) ("Project"), proposed by Citadel Holdings Group, LLC. This request excludes any documents that are otherwise available on the City of Commerce website.¹

We would like to draw your attention to two matters of concern that need to be addressed:

1. The DEIR no longer gives a list of references and now states: *Please note the references consulted as part of the Draft EIR's preparation are identified using footnotes. The URLs are identified for those online sources while the printed sources are maintained in a repository at the Planning Division in City Hall. <http://ca-commerce.civicplus.com/DocumentCenter/View/4453> -- DEIR, page 249. However, **we are requesting all documents referenced or relied upon in the DEIR, including, but not limited to those cited only in the footnotes.***
2. Page 125 of the DEIR states: *Based on infiltration testing by the geotechnical engineer, infiltration is infeasible for the project site due to unfavorable infiltration test result and soil stratigraphy per infiltration testing conducted by GPI Geotechnical (see Appendix D). However, **Appendix D is still missing in the DEIR.***

Our request for all documents referenced or relied upon in the DEIR is made pursuant to Public Resources Code (PRC), section 21092(b)(1), which requires that all documents referenced in an environmental review document be made available to the public for the entire comment period.

Pursuant to Government Code section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into chunks of 10 MB or less), please email them to ssannadan@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.

¹ <http://www.ci.commerce.ca.us/>; accessed March 28, 2019.
4871-003nep

March 28, 2019

Page 3

I will be calling you to arrange for duplication/transmission of the documents.
If you have any questions, please call me at (650) 589-1660.

Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:acp

4571-005ncp