

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

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

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

kcarmichael@adamsbroadwell.com

SO. SAN FRANCISCO OFFICE

601 GATEWAY BLVD., SUITE 1000
SO. SAN FRANCISCO, CA 94080

TEL: (650) 589-1660
FAX: (650) 589-5062

DANIEL L. CARDOZO
KEVIN T. CARMICHAEL
CHRISTINA M. CARO
JAVIER J. CASTRO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
ANDREW J. GRAF
TANYA A. GULESSERIAN
KENDRA D. HARTMANN*
KYLE C. JONES
DARIEN K. KEY
RACHAEL E. KOSS
AIDAN P. MARSHALL
WILLIAM C. MUMBY

MARC D. JOSEPH
Of Counsel

*Not admitted in California.
Licensed in Colorado.

April 19, 2021

Via Email and U.S Mail

Alisa Goulart, Associate Planner
David Kwong, Director
County of San Joaquin
Community Development Department
1810 East Hazelton Avenue
Stockton, California 95205
Email: alisa.goulart@sjgov.org;
dkwong@sjgov.org

Rachel DeBord
Clerk of the Board
County of San Joaquin
Clerk of the Board Office
44 North San Joaquin Street
Sixth Floor, Suite 627
Stockton, CA 95202
Email: cobrecords@sjgov.org;
rdebord@sjgov.org

Re: Request for Immediate Access to Public Records – 14800 W. Schulte Road Logistics Center Project, PA-1900208 (SA) & PA-2000162 (ER) SCH: 2020110406

Dear Ms. Goulart, Mr. Kwong, and Ms. DeBord:

We are writing on behalf of the **San Joaquin Residents for Responsible Development** (“San Joaquin Residents”) to request *immediate access* to any and all public records referring or related to the 14800 W. Schulte Road Logistics Center Project, PA-1900208 (SA) & PA-2000162 (ER) (“Project”) proposed by LBA RVI-Company XXXII, LLC (“Applicant”). Specifically, this request includes, but is not limited to, the pending 14800 W. Schulte Road Logistics Center Project application (PA-1900208 (SA) & PA-2000162 (ER) and the Environmental Impact Report (“EIR”) that the City is relying on for the Project. It also includes any and all materials, correspondence, electronic mail messages, resolutions, memos, notes, analysis, files, maps, charts, and all other documents related to the Project.

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San Joaquin Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public impacts associated with Project development. San Joaquin Residents includes: the International Brotherhood of Electrical Workers Local 595, Plumbers & Steamfitters Local 442, Sheet Metal Workers Local 104, Sprinkler Fitters Local 669, District Council of Ironworkers and their members and their families; and other individuals that live and/or work in San Joaquin County.

This request is made pursuant to the California Public Records Act, Government Code §§ 6250, et seq. This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of 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 shall be narrowly construed.

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 10-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 available in electronic format such as PDF, please send them via a file hosting program such as Dropbox. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to jlaurain@adamsbroadwell.com and kcarmichael@adamsbroadwell.com as attachments.

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Should you have any questions concerning this request, please contact:

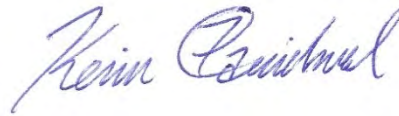
U.S. Mail

Janet Laurain
Kevin Carmichael
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email: jlaurain@adamsbroadwell.com and kcarmichael@adamsbroadwell.com
Phone: (650) 589-1660 (Please leave a message)

Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Carmichael". The signature is written in a cursive style with a large initial "K".

Kevin T. Carmichael
Associate Attorney

KTC:lj

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44 North San Joaquin Street
Sixth Floor, Suite 627
Stockton, CA 95202
Email: cobrecords@sjgov.org;
rdebord@sjgov.org

Re: Request for Immediate Access to Documents Referenced in the Draft EIR – 14800 W. Schulte Road Logistics Center Project, PA-1900208 (SA) & PA-2000162 (ER) SCH: 2020110406

Dear Ms. Goulart, Mr. Kwong, and Ms. DeBord:

We are writing on behalf of the **San Joaquin Residents for Responsible Development** (“San Joaquin Residents”) to request **immediate access** to any and all documents referenced or incorporated by reference in the Draft EIR (“DEIR”) for the 14800 W. Schulte Road Logistics Center Project, PA-1900208 (SA) & PA-2000162 (ER) (“Project”) proposed by LBA RVI-Company XXXII, LLC (“Applicant”). Our request for all documents referenced or incorporated by reference in the DEIR is made pursuant to the California Environmental Quality Act (“CEQA”), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire

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comment period.¹ This request excludes any documents that are currently available under the Project's name on the County of San Joaquin's website as of today's date.²

San Joaquin Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public impacts associated with Project development. San Joaquin Residents includes: the **International Brotherhood of Electrical Workers Local 595, Plumbers & Steamfitters Local 442, Sheet Metal Workers Local 104, Sprinkler Fitters Local 669, District Council of Ironworkers** and their members and their families; and other individuals that live and/or work in San Joaquin County.

The Project includes the proposed construction and operation of three single-story industrial warehouse buildings totaling approximately 678,913 sq. ft., as well as associated improvements, including loading docks, tractor trailer stalls, passenger vehicle parking spaces, and street, sidewalk, and landscape improvements. The 37.96-acre Project site is located at 14800 W. Schulte Road within southwestern unincorporated San Joaquin County, California.

We request ***immediate access*** to review the above documents pursuant to CEQA. If the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to jlaurain@adamsbroadwell.com and kcarmichael@adamsbroadwell.com as attachments. We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (650) 589-1660 with a cost estimate before copying/scanning the materials.

¹ See Pub. Resources Code, § 21092, subd. (b)(1); 14 Cal. Code Regs. § 15087(c)(5); *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007).

² Accessed <http://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/APD%20Documents/PA-2000162/Schulte%20Road%20Logistics%20Center%20-%20Draft%20EIR.pdf> and <http://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/APD%20Documents/PA-2000162/Schulte%20Road%20Logistics%20Center%20-%20Draft%20EIR%20-%20Appendices.pdf> on

April 15, 2021.

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Kevin Carmichael
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Thank you for your assistance with this matter.

Sincerely,

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Kevin T. Carmichael
Associate Attorney

KCT:ljl