

KATZOFF & RIGGS LLP

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July 30, 2021

VIA FAX

Custodian of Records
San Mateo County
Planning and Building Dept.
455 County Center
Redwood City, CA 94063
Fax: 650-363-4949

Re: **PUBLIC RECORDS ACT REQUEST**

This is a Public Records Act Request pursuant to Government Code §§ 6250 *et seq.*” Your response is due within ten (10) days of your receipt of this request. Please feel free to contact me at (510) 588-5178 or ncampbell@katzoffriggs.com with any questions or comments regarding this request.

For purposes of this request, the following terms have the following definitions:

“**All**” and “**any**” each mean “any and all.”

“**TJ Singh**” shall refer to Tejinder Singh.

“**Trip Chowdhry**” shall refer to Tripatinder S. Chowdhry.

“**TEG**” shall refer to TEG Partners, LLC

“**TEG Property**” shall refer to the property owned by TEG Partners, LLC located at San Mateo County APN 048-076-120.

“**Hermosa Ave. Parcel**” shall refer to the property owned by Brad and Melanie Lucas located at San Mateo County APN 048-076-140

“**Miramar Drive**” shall refer to the street known as Miramar Dr. located in Half Moon Bay, California 94019

Letter to San Mateo Planning Dept.

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“Communications” include all verbal and written communications of every kind, including but not limited to telephone calls, conferences, conversations, meetings, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

“Documents” include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies; comparisons; tabulations; budgets; workpapers; charts; plans; maps; drawings; engineering and other diagrams (including “one-line” diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including workpapers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise. “Documents” shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or appendices to any documents.’

“Relating to” means concerning, pertaining to, referring to, describing, mentioning, containing, evidencing, constituting, dealing with, discussing, considering, analyzing, studying, reporting on, commenting on, setting forth, supporting, recommending or otherwise concerning in any manner whatsoever the subject matter of the inquiry.

“You” and **“Your”** include, without limitation, County of San Mateo Planning and Building Department, San Mateo County Code Enforcement, the San Mateo County Department of Public Works, all San Mateo County Planning and Building Department personnel and staff, and all agents, employees, and representatives affiliated and associated with these individuals.

Letter to San Mateo Planning Dept.

July 30, 2021

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Specifically, this request seeks the following documents:

1. All **Documents Relating to** San Mateo County Planning & Building Permit No. BLD95-0458 for a retaining wall. Included in this request are all correspondence, memos, reports and records of meetings related to the application as well as action taken by the **You** on the application.
2. All **Documents Relating to** San Mateo County Planning & Building Department Permit No. GRD94-0006 for grading. Included in this request are all correspondence, memos, reports and records of meetings related to the application as well as action taken by the **You** on the application.
3. All conditions of approval for San Mateo County Planning & Building Permit No. BLD95-0458.
4. All conditions of approval for San Mateo County Planning & Building Permit No. BLD94-0567 **Relating to** the development of 620 Miramar Drive, Half Moon Bay, California.
5. All conditions of approval for San Mateo County Planning & Building Permit No. BLD94-0568 **Relating to** the development of 630 Miramar Drive, Half Moon Bay, California.
6. All conditions of approval for San Mateo County Planning & Building Permit No. BLD97-0436 **Relating to** the development of 640 Miramar Drive, Half Moon Bay, California.
7. All conditions of approval for the Lot Line Adjustment identified as San Mateo County Planning & Building File No. LLA 92-0001.
8. All conditions of approval for the Lot Line Adjustment identified as San Mateo County Planning & Building File No. LLA 92-0004.
9. All conditions of approval for the application for subdivision identified as San Mateo County Planning & Building File No. SMN 91-0017.
10. All conditions of approval for San Mateo County Planning & Building Permit No. BLD97-1642 **Relating to** the development of 650 Miramar Drive, Half Moon Bay, California.
11. All **Communications**, inquiries, memos, reports and records of meetings **Relating to** access road plans and construction for San Mateo County

Planning & Building Permit No. BLD94-0568 for the development of 630 Miramar Drive, Half Moon Bay, California and adjacent properties.

12. All **Communications**, inquiries, memos, reports and records of meetings **Relating to** the construction of a median and/or retaining wall within Miramar Drive in connection with San Mateo County Planning & Building Permit No. BLD94-0568 for the development of 630 Miramar Drive, Half Moon Bay, California and adjacent properties.
13. All **Communications**, inquiries, memos, reports and records of meetings **Relating to** the final approval by the Public Works Department of San Mateo County Planning & Building Permit No. BLD97-1642 for the development of 650 Miramar Drive, Half Moon Bay, California and adjacent properties.
14. The comment list sent by **You** on or about September 6, 1994 to the property owner in connection with San Mateo County Planning & Building Permit No. BLD94-0568 for the development of 630 Miramar Drive, Half Moon Bay, California and adjacent properties.
15. All applications to the San Mateo County Planning and Building Department relating to the development or grading of the **Hermosa Ave. Parcel**. Included in this request are all correspondence, memos, reports and records of meetings between **TJ Singh** and **Trip Chowdhry** and County personnel related to the permit application as well as action taken by the County on the application.
16. All **Communications**, not otherwise requested, between **TEG** and/or **TJ Singh** or **Trip Chowdhry** and **You** relating to the **Hermosa Ave. Parcel**.
17. All **Communications**, not otherwise requested, between January 1, 2018 and the present between **TEG** and/or **TJ Singh** or **Trip Chowdhry** and **You** relating to the median and/or retaining wall located within **Miramar Drive**.
18. All **Communications** between **You** and **TJ Singh** and/or **Trip Chowdhry** **Relating to** permit application no. DSR-98-0123 for the development of 22 Terrace Avenue, Half Moon Bay, California. Included in this request are all correspondence, memos, reports and records of meetings between **TJ Singh** and **Trip Chowdhry** and **Your** personnel related to the permit application as well as action taken by the **You** on the **Communications**.

19. All **Communications** between **You** and Francois X. Sorba **Relating to** permit application no. DSR-98-0123 for the development of 22 Terrace Avenue, Half Moon Bay, California. Included in this request are all correspondence, memos, reports and records of meetings between **TJ Singh** and **Trip Chowdhry** and **Your** personnel related to the permit application as well as action taken by the **You** on the **Communications**.
20. All **Communications** between July 9, 2021 and the present between **You** and **TJ Singh** and/or **Trip Chowdhry** or any individual on behalf of **TEG Relating to** the Notice of Violation, No. 2017-00054 issued to **TEG** regarding the fence erected on the **TEG Property** without a permit.
21. All **Communications** between July 9, 2021 and the present between **You** and **TJ Singh** and/or **Trip Chowdhry** or any individual on behalf of **TEG Relating to** any application for a Coastal Development Permit to legalize the fence erected on the **TEG Property** without a permit. Included in this request are all correspondence, memos, reports and records of meetings between **TJ Singh** and **Trip Chowdhry** and **Your** personnel related to the application as well as action taken by the **You Relating to** the application.
22. All **Communications** between May 7, 2021 and the present between **You** and **TJ Singh** and/or **Trip Chowdhry** or any individual on behalf of **TEG Relating to** tree removal permit application No. PLN2021-00090. Included in this request are all correspondence, memos, reports and records of meetings between **TJ Singh** and **Trip Chowdhry** and **Your** personnel related to the permit application as well as action taken by the **You** on the application.

We will accept electronic copies of the records. Please advise of any copying expenses for this request and if payment is required before releasing copies.

If your response is anything other than an unqualified agreement to produce copies of or allow inspection of all requested documents, then please attach to your response a copy of your regulations, if any, concerning the procedures to be followed for obtaining records under the California Public Records Act.

If you determine that some or all of the requested documents, or portions of documents, are exempt from disclosure, please describe the withheld documents and deleted portions of documents in detail. Please also specify the statutory bases for the denial as well as your reasons for believing that the statutory justification applies. Pursuant to Government Code § 6257, reasonably segregable portions of documents must be made available even if other portions of the requested documents are exempt. Pursuant to Government Code § 6256.2,

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you must provide the name and title or position of each individual responsible for denying access to any requested documents.

Pursuant to Government Code § 6253.1, if you have any difficulty identifying responsive records, we request that you provide assistance and suggestions for identifying responsive documents and for overcoming any practical basis for denying access.

Thank you for your assistance and cooperation in this matter.

Sincerely,

/s/ Nicole C. Campbell

Nicole C. Campbell

Diana Higuera

From: Melissa Andrikopoulos
Sent: Monday, August 9, 2021 4:50 PM
To: Nicole Campbell
Cc: Annabelle Gaiser; Lisa Aozasa; Amy Ow
Subject: RE: Public Records Request

Hi Nicole,

I am in receipt of your request for public records dated July 30, 2021, and I have determined that unusual circumstances exist within the meaning of California Government Code section 6253(c), such that the time limit prescribed in that section may be extended by this written notice by 14 days. The reasons for this extension are (1) the need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request; and (2) the need for consultation among two or more components of the agency having substantial subject matter interest therein. You may expect a determination to be dispatched on August 23, 2021.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, August 2, 2021 10:55 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: Re: Public Records Request

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Good morning, Melissa,

See attached request. Feel free to call me for any clarification that might be helpful.

Best,

Nicole Campbell

Katzoff & Riggs LLP

1500 Park Avenue, Suite 300

Emeryville, CA 94608

(510) 588-5178

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, July 30, 2021 3:50 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Subject: RE: Public Records Request

Thanks for letting me know, Nicole. If you don't mind forwarding it my way, that would be helpful. Thanks!

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, July 30, 2021 3:16 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: Public Records Request

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Hi Melissa,

I wanted to give you a heads up that we needed to make a second PRA request to the County of San Mateo. I made an effort to limit the requests and make them as descriptive as possible. Let me know if you would like a copy.

Best,

Nicole Campbell

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From: Melissa Andrikopoulos
Sent: Monday, August 23, 2021 9:16 PM
To: Nicole Campbell
Cc: Annabelle Gaiser; Lisa Aozasa; Amy Ow
Subject: RE: Public Records Request

Hi Nicole,

We have determined that your request calls for the production of non-exempt records in our possession. We will produce the records on a rolling basis as they are identified and reviewed for responsiveness and exemptions. The Department has received a number of requests for public records that overlap and relate to the same matters. As a result, we are in the process of uploading responsive records to an accessible site, located at the following URL:

<https://planning.smcgov.org/hermosa-miramar-PR>

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Diana Higuera

From: Melissa Andrikopoulos
Sent: Tuesday, August 24, 2021 11:51 AM
To: Nicole Campbell
Cc: Annabelle Gaiser; Lisa Aozasa; Amy Ow
Subject: RE: Public Records Request

Hi Nicole,

In addition to the records that are being provided at the link, staff has also located potentially responsive records that are currently stored on microfilm. Specifically, I understand that the building files you've requested are stored on the microfilm for each address identified below. The Department uses a service to print microfilm records. Here is an estimate of the associated cost of printing:

- There are about 678 microfilmed documents. The table has the approximate breakdown.
 - The charge is \$22.50 for large size/per image printing and \$4.50 for letter size/per image printing.
 - To print all 678 documents, assuming these rates, the cost is estimated at \$2,344.50 for all letter size documents and \$3,532.50 for larger than letter size for a total of \$5,877.00.

Address	8.5"x11"	Larger than 8.5"x11"
650 Miramar Drive	136	27
620 Miramar Drive (envelope 1)	151	34
620 Miramar Drive (envelope 2)	58	47
640 Miramar Drive	176	49
Document Total	521	157

Please confirm whether you agree to pay the cost of printing the microfilm.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Tuesday, August 24, 2021 10:56 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Lisa Aozasa <laozasa@smcgov.org>; Amy Ow <aow@smcgov.org>
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