

1 O'BRIEN WATTERS & DAVIS, LLP  
2 Noreen M. Evans (CSB No. 102385)  
3 Fountaingrove Corporate Centre I  
4 3510 Unocal Place, Suite 200  
5 P.O. Box 3759  
6 Santa Rosa, CA 95402-3759  
7 (707) 545-7010

8 Attorneys for Petitioner/Plaintiff  
9 Friends of Chanate

ENDORSED  
FILED

DEC 12 2017

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SONOMA

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10 FRIENDS OF CHANATE,

11 Petitioner and

12 Plaintiff,

13 and

14 COUNTY OF SONOMA,

15 Respondent and

16 Defendant,

17 CHANATE COMMUNITY DEVELOPMENT  
18 PARTNERS, LLC,

19 Real Party in Interest.

CASE NO. SCV 261103

DECLARATION OF SONIA E. TAYLOR IN  
SUPPORT OF MOTION TO SET  
REASONABLE COST OF PREPARING  
ADMINISTRATIVE RECORD

Date: FEB 07 2018

Time: 3:00 pm

Dept: 18

Complaint Filed: August 9, 2017

Trial Date: None

20 I Sonia Taylor, declare:

21 1. The following matters are of my own personal knowledge and, if called to testify as a  
22 witness, I can testify competently thereto.

23  
24 2. I am a resident of Santa Rosa, CA and a member of Friends of Chanate, Petitioner and  
25 Plaintiff herein.

26 DOCUMENTS THAT SHOULD BE PART OF THE ADMINISTRATIVE RECORD

27 3. When I became aware of the project the County of Sonoma refers to as the "Chanate  
28 Complex," I began requesting documents so that I could understand both the history of the project, and

1 the decisions the Board of Supervisors would be making. From February through August of 2017, I  
2 made numerous requests for documents, detailed below. Each listing below includes the date of the  
3 request, a summary of the requested document(s), the date I received a response, the total page count of  
4 the response, and the page count of the documents that I believe are relevant to this lawsuit. Since  
5 emails were sent, received and produced, I have of necessity estimated the page counts for those emails,  
6 so the total number of documents produced and documents relevant to this lawsuit is an informed  
7 estimate.

8 4. I have obtained a copy of the agendas, staff reports and minutes for the public hearings held  
9 by the Sonoma County Board of Supervisors on the Chanate project. I reviewed all of the County  
10 minutes on the Chanate project, including the times the Board of Supervisors addressed the Chanate  
11 project agenda item. Based on my review of the County's minutes, I calculate that the Board of  
12 Supervisors held 535 minutes, or 9 hours of hearing on the Chanate project. (Ex. 4.)

13 5. I could find only 7 closed session hearings, although the County represents there were 10.  
14 The approximate total of the complete agendas, minutes and staff reports for these public and closed  
15 sessions is approximately 227 pages.

16 6. Attached hereto as Exhibit 4 is a true and correct list of the documents I have been able to  
17 obtain that the County has made available to the public for the Chanate project, including the agendas,  
18 staff reports and all supporting material, minutes, RFP, responses to RFP and the Disposition and  
19 Development Agreement and attachments. Based on my review of all of the public documents in this  
20 matter, they total 4,152 pages. (Ex. 4.) I believe that an estimate of 10,000 - 12,000 pages for the AR is  
21 a generous estimate.

## 22 MY EFFORTS TO OBTAIN DOCUMENTS FROM THE COUNTY

23 7. On 2/2/17 I requested a copy of all emails sent to the County's generic [chanateinfo@sonoma-  
county.org](mailto:chanateinfo@sonoma-<br/>24 county.org) email address. On or about 3/11/17 I received these emails, for a total of 10 pages.

25 8. On 2/2/17 and again on 2/3/17, I asked for the staff report, maps and materials related to the  
26 hearing scheduled for 2/7/17 and any Powerpoint presentation and for the RFP responses. On 2/3/17 I  
27 received 47 pages, but that did not include the RFP itself or the RFP responses.  
28

1 9. On 2/3/17 I received the RFP response and Supplemental response of Curt Johansen, which  
2 totaled 92 pages. Also on 2/3/17 I received the Supplemental response of William P. Gallaher, which  
3 was 35 pages.

4 10. The RFP for this project is 30 pages, without the attachments. The attachments total 465  
5 pages. In addition there were 4 addenda to the RFP, totaling 7 pages, for a total of 502 pages  
6 comprising the RFP.

7 11. On 2/6/17 I sent a 10 page letter to the Board of Supervisors on this project.

8 12. On 2/6/17 I received the William P. Gallaher RFP response, totaling 98 pages.

9 13. On 2/12/17 I requested a copy of the "2016 appraisal report" on the Chanate property. The  
10 7/29/16 appraisal is a total of 197 pages.

11 14. On 2/22/17 I asked if the County would be filing a Notice of Determination with regard to  
12 this project, and, if so, asked for a copy. To the best of my recollection I did not receive a response.

13 15. On 2/24/17 I requested a copy of the Phase 1 Environmental Site Assessment Report It is  
14 703 pages.

15 16. On 3/2/17 I asked the County to provide all documentation and information regarding the  
16 Board of Supervisors' direction to staff to begin negotiations with William Gallaher. I did not receive a  
17 response.

18 17. On 3/5/17 I requested three final resolutions covering actions taken by the Board of  
19 Supervisors on 3/18/14, on 8/11/15 and on 6/21/16, as well as a copy of all correspondence the Board  
20 received for the 2/7/17 hearing. On 3/6/17 I received the three final resolutions I requested, as well as  
21 the minutes for those meetings, for a total of 66 pages.

22 18. On 3/6/17 I requested a number of documents I received the following documents: email  
23 response (2 pages), Demolition costs summary (4 pages), Environmentally Regulated Survey Report  
24 (491 pages), Facilities Ad Hoc Staff Report (6 pages), powerpoint for the 8/11/15 Board of Supervisors  
25 (17 pages) October 2014 outreach meeting agenda and meeting notes(18 pages), surplus property  
26 determination and supporting materials (12 pages) William Gallaher's \$50,000 deposit check (1 page),  
27 final Geologic Fault Hazard Study (468 pages).  
28

1 19. On 5/11/17 I asked for a copy of the Rutherford & Chekene survey. This document is 23  
2 pages, but does not appear relevant to the issues in this lawsuit.

3 20. On 5/17/17 I asked for a copy of the County's Powerpoint presentation to a community  
4 meeting. This Powerpoint was a total of 19 pages.

5 21. On 6/6/17, I downloaded the Disposition and Development Agreement (DDA) for this  
6 project from the County. The DDA is a total of 172 pages.

7 22. On 6/6/17, I downloaded the staff report and supporting materials for the 6/20/17 Board of  
8 Supervisors hearing from the County website, for a total of 20 pages. An additional 19 pages of  
9 communications to the Board were also made available on or around 6/19/17.

10 23. On 6/6/17 I received a 2 page notice of the 6/20/17 Board of Supervisors hearing on this  
11 project.

12 24. On 6/14/17 I sent a 2 page letter to the Board of Supervisors on this project.

13 25. On 6/16/17 I sent a request for a variety of documents to the County with regard to this  
14 project. On 6/29/17 I received a written response from the County, which is 6 pages. On 8/29/17 I  
15 received the following documents: a Capital Improvement Plans from 2006-2011 through the current  
16 plan, (4215 pages), historic studies for the period from 2004-2014 (249 pages), 2012 Comprehensive  
17 Facilities Master Plan (251 pages), executed copy of the Agreement to Negotiate Exclusively (22  
18 pages), Developer's "Articles of Organization and Operating Agreement" (1 page), 2016 Appraisal of  
19 the property; (1 page), Cultural Resources survey (69 pages), Paulin Creek Preserve Draft  
20 Management Plan (40 pages). In response to my request for "all communications any County  
21 department, including the Board of Supervisors, has received regarding this site/proposed project/sale  
22 of the property/DDA for the time period from February 7, 2017 through today" and "all responses to  
23 said communications," I was provided approximately 1425 pages of documents, including a large  
24 number of emails, some of which are duplicative and/or have been counted previously – this total is my  
25 best estimation.

26 26. On 6/16/17 I sent a letter to the Board of Supervisors requesting a continuance of this item  
27 from 6/20/17 to a later date. This email is 1 page.

28

1 27. On 6/17/17 I sent an email to the County asking why the agenda for this item posted for the  
2 Board of Supervisors' 6/20/17 meeting had no materials available; this email was 1 page.

3 28. On 6/19/17 I sent a 14 page letter on this project to the Board of Supervisors.

4 29. On 6/20/17 I requested a copy of all correspondence/communications with regard to the  
5 6/20/17 hearing on this project. On 6/28/17, I received 4 pages of a photocopy of a letter not already  
6 referenced above, along with approximately 25 pages of digital documentation potentially relevant to  
7 the within lawsuit.

8 30. On 7/7/17 I requested another list of documents, and on 8/18/17, I received a 2 page letter  
9 from the County in response to this request. The County produced the following documents: RFP  
10 scoring (6 pages), a list of all Board meetings regarding the Chanate Complex (1 page) preliminary  
11 traffic evaluations (27 pages).

12 31. On 7/10/17 I sent a 4 page letter on this project to the Board of Supervisors.

13 32. On 7/31/17 I requested the final executed materials from the 7/11/17 Board of Supervisors  
14 meeting on this matter; I received 201 pages on 7/31/17, of which 194 pages have been counted, above,  
15 leaving 7 pages of new materials.

16 33. On 8/1/17 I requested a copy of the executed Right of Entry and Access Agreement, and  
17 received this 12 page document on 8/1/17.

18 34. On 8/17/17 I sent an email that asked four questions. The County sent me a 3 page response  
19 but no other documents were produced.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
21 true and correct.

22 Dated: December 12, 2017

  
Sonia E. Taylor

DATE	EVENT(S)/DOCUMENT(S)	APPROXIMATE PAGE COUNT
3/18/14	Board of Supervisors Open Session, formation of the Facilities Ad Hoc Committee. 2:25:53-3:45:47 p.m.	42
9/10/14	Property appraisal by Howard Levy Appraisal Group	115
9/30/14	Phase 1 Environmental Site Assessment Report prepared by Citadel Environmental Services, Inc.	703
11/17/14	Seismic Survey Phase 1, prepared by ZFA Structural Engineers	92
1/28/15	Chanate Hospital Decommissioning Report prepared by Kitchell	68
2/2/15	HVAC Analysis for County Center Development Phase 1 prepared by GHD	105
2/13/15	Seismic Evaluation – Phase 2 Report prepared by ZFA Structural Engineers	376
3/10/15	Environmentally Regulated Survey Report prepared by Citadel Environmental Services, Inc.	491
3/23/15	A Cultural Resources Survey for the Government Center Development – Phase 1A, prepared by Tom Origer & Associates	69
5/5/15	Chanate Hospital Demolition Conceptual Cost Rough Order of Magnitude (ROM), prepared by Kitchell	4
7/21/15	Facilities Ad Hoc Committee Report	9
8/11/15	Board of Supervisors Open Session, Facilities Ad Hoc Committee Report and Recommendations; Initiated Surplus Property Offering, Staff develop RFQ/RFP to “solicit development plans,” and Staff develop a Community Engagement Plan, Item 36 Agenda, Board Packet, presentation, minutes, Resolution 2:31:16-3:40:29 p.m.	42
9/22/15	Board of Supervisors Closed Session, “initiate the surplus property procedures and take other actions related to the sale or long term lease,” Item 38 Agenda, minutes, Resolution	29
10/14/15	County holds community meeting to provide overview of Chante site and to get information and ideas about desired amenities and improvements.	68
10/28/15	County sends out “surplus property” notice, including mailing list	12
11/19/15	Geologic Fault Hazard Summary by ZFA Structural Engineers	4
2/2/16	Board of Supervisors Open Session, Authorized issuance of RFP, Item 28 Agenda, Board Packet, presentation, minutes, Resolution 2:21:43-3:57:55 p.m.	504
2/10/16 – 5/5/16	County advertises the RFP.	
2/24/16	RFP Addendum 1	1
3/2/16 and 3/31/16	RFP Pre-Proposal Conferences; includes agenda, notes, powerpoint presentation, handout	48
3/9/16	RFP Addendum 2	1
4/4/16	RFP Addendum 3	2
4/29/16	RFP Addendum 4	3

5/5/16	County receives RFP responses from CCDP and CCC, including supplemental responses	234
5/13/16	Public Records Act Request by David Grabill	3
5/24/16	County denial of David Grabill PRA request	2
6/21/16	Board of Supervisors Open Session, receiving RFP responses, Item 15 Agenda, Board Packet, presentation, minutes, Resolution This was a consent item	31
7/29/16	Property appraisal by Howard Levy Appraisal Group	197
8/30/16	Scoring of Proposals	6
9/13/16	Board of Supervisors Closed Session, "direct General Services to negotiate an Exclusive Negotiations Agreement" with Gallaher/CCDP, Item 52 Agenda, minutes, Resolution	46
10/27/16	Appraisal Addendum by Ward Levy Appraisal Group	1
1/23/17	Chanate Community Development Partners LLC Articles of Incorporation	1
1/24/17	Board of Supervisors Closed Session, "Direction to negotiators," Item 33 Agenda, minutes, Resolution	56
2/7/17	Board of Supervisors Open Session, "Approve the selection of William Gallaher as the Developer" and "approve the Exclusive Negotiating Agreement with William Gallaher. Adopted Resolution 17-0073 authorizing budget adjustment," Item 31 Agenda, Board Packet, presentation, minutes, Resolution, communications to the Board of Supervisors 3:46:46 – 6:13:15 p.m.	89
2/27/17	Executed Agreement to Negotiate Exclusively	22
3/1/17	OSL Properties LLC pays \$50,000 deposit check to the County	1
3/28/17	Board of Supervisors Closed Session, "Update on Negotiations," Item 18 Agenda, minutes, Resolution	18
5/2/17	Board of Supervisors Closed Session, "Update on Negotiations," Items 25 and 26 Agenda, minutes, Resolution	25
5/16/17	Board of Supervisors Closed Session, "Update on Negotiations," Items 28 and 29 Agenda, minutes, Resolution	26
5/23/17	Board of Supervisors Closed Session, "Update on Negotiations," Items 33 and 34 Agenda, minutes, Resolution	35
6/20/17	Board of Supervisors Open Session, "Adopt a Resolution introducing an Ordinance approving a Development and Disposition Agreement authorizing the sale of the 81.56-acre County-owned Chanate property; (First Reading)," Item 30 Agenda, Board Packet, presentation, minutes, Resolution, Ordinance, communications to the Board of Supervisors 1:59:09 – 5:41:36 p.m.	305

7/11/17	Board of Supervisors Open Session, " Adopt Ordinance approving Development and Disposition Agreement authorizing the sale of the 81.56-acre County-owned Chanate property (Second Reading," Item 9 Agenda, Board Packet, presentation, minutes, Resolution, Ordinance, communications to the Board of Supervisors Sound is screwed up, can't tell where #9 starts, also part of Consent Calendar – stops at 1:22:24 p.m.	230
7/28/17	Right of Entry and Access Agreement	12

4152 total pages