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10 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SONOMA

11 FRIENDS OF CHANATE,

12 Petitioner and Plaintiff,

13 and

14 COUNTY OF SONOMA,

15 Respondent and Defendant,

16 CHANATE COMMUNITY
17 DEVELOPMENT
18 PARTNERS, LLC,

19 Real Party in Interest.

ENDORSED
FILED

DEC 12 2017

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SONOMA

CASE NO. SCV 261103

MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PETITIONER'S MOTION TO SET COST OF
PREPARATION OF ADMINISTRATIVE
RECORD

Date: FEB 07 2018
Time:
Dept: 18

Complaint Filed: August 9, 2017
Trial Date: None

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I. INTRODUCTION

PETITIONER/PLAINTIFF FRIENDS OF CHANATE hereby moves this Court pursuant to the provisions of Public Resources Code ("PRC") section 21167.6(e) for an order setting the reasonable cost of preparing the Administrative Record ("AR") in this case or, alternatively, for an order that Petitioner prepare the AR, subject to review and certification by defendant County of Sonoma.

The County asserts that preparation of the AR in this case will cost a minimum of \$50,000, including \$8,500 for gathering more than 1 million pages of documents from County departments, \$5,500 for culling through them to remove duplicates, \$10,000 for reviewing them for privilege, and \$11,000 for preparing transcripts. The County estimates the actual cost of preparing and certifying the AR to be \$15,000. Petitioner challenges the County's estimate as unreasonable and including tasks that are unnecessary to preparation of the AR in view of the scope of issues before the Court.

In a case where no environmental impact report was prepared and the County declared the project exempt from the California Environmental Quality Act ("CEQA"), the County conducted a search of all County files for documents containing the word "Chanate" and identified a universe of over 1 million pages of documents, the bulk of which are not related to the preparation of the AR in this case. Based on its review of the documents made available to the public by the County, Petitioner estimates that the public documents in this case total 4,152 pages and the AR in this case should not exceed 10,000 - 12,000 pages maximum.

The County steadfastly and unreasonably refuses to cooperate with Petitioner to reduce the cost of preparing the record.

II. FACTS

1. The Petition

The issues raised in the Petition herein, filed August 9, 2017, are narrow in scope. The Court is not being asked to review the adequacy of an EIR. The Court is being asked to determine whether the project herein constituted a "project" as a matter of law within the meaning of CEQA, whether the County complied with the Brown Act and other Government Code provisions, and whether the value received by the County for the sale of the Chanate Campus was adequate under the California Constitution.

1 The Petition herein arises from the Disposition and Development Agreement (“DDA”) executed
2 between the County and Real Party in Interest, Chanate Community Development Partners, LLC
3 (“RPI”) for the development and sale of 82 acres of prime real estate on Chanate Road in Santa Rosa,
4 known as the Chanate Campus. (Petition, paras. 7-8) Among other things, the Petition alleges that by
5 adopting the DDA, the County approved a development agreement with RPI and, by committing funds
6 to assist RPI in preparing an application to the City of Santa Rosa for entitlements and retaining the
7 right to entitle the project if the City does not issue entitlements as desired by the County, as well as by
8 making the sales price for the Chanate Campus contingent in the number of units entitled, the County
9 improperly committed itself to a course of conduct prior to the environmental review required by
10 CEQA. (Petition, paras. 63, 66-67.)¹ The Petition herein alleges causes of action under the Ralph M.
11 Brown Act and the California Constitution. (Petition, paras. 2, 57-61, 63, 69-72, 74-76.)

12 The Petition was served on the County on August 10, 2017, along with a Request to Prepare
13 the Administrative Record.

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17 ¹ Petitioner’s cause of action under CEQA challenges the County’s exemption of the Chanate project
18 from CEQA. As a general rule, the law presumes that the lead agency is neutral and objective and that
19 its interest is in compliance with CEQA. It is this neutral role which could cause it to reject the project
20 or certify an EIR supporting one of the project alternatives or calling for mitigation measures to which
21 the applicant is opposed. The agency’s unbiased evaluation of the environmental impacts of the
22 applicant’s proposal is the bedrock on which the rest of the CEQA process is based. (*Citizens for Ceres*
v. Superior Court (2013) 217 Cal.App.4th 889, 917.) The decision in *Citizens for Ceres, supra*,
23 addressed the issue of whether a project proponent and the lead agency shared a common purpose such
24 that the attorney-client privilege and work product privilege applied to communications between the
25 project proponent and the lead agency. *Citizens for Ceres, supra*, relied in part on the Supreme Court’s
26 decision in *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116.

27 In *Save Tara, supra*, 45 Cal.4th at 132, the Supreme Court held that that a city could not define
28 “approval” of a project in such a way that its actual commitment to the project was already made before
environmental review had been completed and the project formally approved. In *Save Tara*, the city
entered into an agreement to develop property conditioned on subsequent environmental review and
CEQA compliance. Before environmental review was completed, the city lent money to the developer
for preparatory activities, announced publicly that it was determined to proceed with the project, and
began relocating tenants whom the project would displace. The Supreme Court held that the city
violated CEQA because it was committed to the project before going through environmental review.
The city’s actions tended strongly to show that its commitment to the project was not contingent on
review of an EIR. (*Save Tara, supra*, discussed in *Citizens for Ceres, supra*, 217 Cal.App.4th at 918.)

1 2. The County's estimate of costs

2 The day before Thanksgiving, the County advised Petitioner that preparation of the AR will cost
3 a minimum of \$50,000 and requested payment within 5 business days. (Ex.1.) The County broke down
4 the cost as follows:

5 Gathering all documents from all County departments	\$8,500
6 Culling through the data to remove duplication	\$5,500
7 Reviewing documents for privilege	\$10,000
8 Preparing transcripts	\$11,000
9 Preparing the AR	\$12,500
10 Reviewing the AR for accuracy/certifying for lodging	\$2,500

11 **TOTAL ESTIMATED COSTS** **\$50,000 (Ex. 1.)**

12 The County's estimate set forth above, minus the cost of preparing the transcript, totals \$39,000.
13 The average hourly rate charged by the County is \$107.50. (Ex. 1.) Doing the math and dividing
14 \$39,000 by \$107.50, the County anticipates that preparation of the AR will require 365 hours of staff
15 time, or more than 10 weeks of full time staff work at 35 hours per week. (Ex. 1, Declaration of Noreen
16 M. Evans, Esq., para. 8.)

17 3. The County's search for records

18 During this highly controversial project, the County failed to maintain an official file on the
19 Chanate project. Instead, some County departments maintain documents related to the Chanate project,
20 forcing members of the public to travel from one County department to another in search of
21 information on the project. (Declaration of James J. Barnes, Esq., paras. 7-8.)

22 On September 28, 2017, County Counsel represented to Petitioner that the County searched all
23 of its departments for any and all documents containing the word "Chanate" and discovered 18GB, or
24 over 1 million pages, of material. Petitioner offered to review the documents or a list of the documents
25 in the County's possession in order to help remove extraneous and irrelevant documents, to reduce
26 costs of preparing the AR. Despite Petitioner's numerous offers and requests, the County refuses to
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1 provide Petitioner with the documents or a list of the documents on the ground that doing so would
2 drive up the cost of preparing the AR. (Evans decl., para. 11.)

3 The County advised Petitioner on November 21, 2017, that the County had reduced the size of
4 the universe of potential documents for inclusion in the AR to 8GB or 800,000 pages. (Ex. 1.) In a
5 subsequent meet and confer conference call discussed below, the County and the attorney for RPI
6 represented that the County has some 360,000 to 700,000 pages of documents, most of which were
7 duplicative staff emails plus attachments, and fell within the "catchall" provisions of PRC section
8 21167.6(e). The County made no effort to define the relevance of these voluminous and duplicative
9 staff emails to the issues before this Court. (Evans decl., para.11.)

10 4. Petitioner's estimate of the cost to prepare the AR

11 Based on its review of the documents made available by the County to the public regarding the
12 Chanate project, Petitioner believes an estimate of 10,000 - 12,000 pages for the AR is a generous
13 estimate. Documents made available to the public total 4,152 pages, not including communications
14 between the County and RPI or the public. (Ex. 4; Declaration of Sonia Taylor, para. 6.)

15 The County maintains its agendas, public notices, and minutes readily available on its public
16 website. The County also maintains a public website devoted exclusively to the Chanate project, at
17 <http://sonomacounty.ca.gov/General-Services/Facilities-Development-and-Management/Chanate-Complex/>. This website
18 includes all of the relevant documents including appraisal reports, Geological Fault Hazard Summary
19 and other technical reports, the RFP and all responses thereto, the DDA and all attachments, documents
20 related to the County's outreach meetings, including questions and answers, and many other relevant
21 documents. (Evans decl., para. 3.)

22 Individual members of the public, including Friends of Chanate members Sonia E. Taylor and
23 James J. Barnes, Esq., have made numerous requests for records from the County, including a request
24 for all communications between the County and any member of the public. (Barnes decl., paras. 1-8;
25 Taylor decl., paras. 5, 7-34.) When Friends of Chanate member Jim Barnes went to the County to ask to
26 review the County's file on this project, he was told by both the General Services Department and by
27 County Counsel that that County did not maintain a file on the project. He was told by General Services
28 that the County did not know which departments had files on the project and that they would have to

1 search to find the files. He was told by County Counsel that he was not going to be viewing any public
2 records and that they would have to assemble them for him. County Counsel asked what specific
3 documents he wanted, but it was virtually impossible to guess what documents he would want without
4 having seen the County's file. (Barnes decl., para. 7-8.) Mr. Barnes specifically asked for
5 communications between the County and RPI. (Barnes decl., para. 8.) The County never produced any
6 such communications. (Barnes decl., para. 16.)

7 The County did not prepare an EIR or even an Initial Study for the Chanate project, nor has the
8 County prepared any of the technical studies that would ordinarily be required by CEQA such as a
9 traffic study, groundwater study, or inventory of endangered species. The County has not accepted
10 public comment; provided responses to public comment, or held the public hearings called for by
11 CEQA. (Evans decl., para. 4.) The County declared the DDA was not a "project" within the meaning
12 of CEQA. (Petition, para. 6.) Nevertheless, the County inexplicably asserts that Petitioner's allegation
13 that the County failed to comply with CEQA as a matter of law, somehow makes the AR more costly to
14 prepare. (Ex. 1.)

15 5. Preparation of transcripts

16 The County advises that there are four large hearings yet to be transcribed. (Ex. 5.) The court
17 reporter for the County provided what the court reporter described as a "high" estimate of \$6,000 for
18 these transcripts. The County states there are reports on 10 closed sessions to be transcribed at a cost of
19 \$100 each or a total of \$1,000. The court reporter states that the total "ROUGH estimated cost of work
20 done and work to do may be near \$11,000." (Ex. 3.)

21 According to a review of the County's minutes and videos, the meeting on 3/18/14 began at
22 2:25 minutes and closed at 3:45 minutes, a total of 80 minutes. (Ex. 4.)

23 The meeting on 8/11/15 started at 2:31 minutes. and ended at 3:40 minutes, a total of 69
24 minutes. (Ex. 4.)

25 The meeting on 2/2/16 commenced at 2:21 minutes and closed at 3:57 minutes, a total of 96
26 minutes. (Ex. 4.)

1 According to the County's minutes, the hearing on February 7, 2017 began at approximately
2 3:46 minutes. and closed at 6:13 minutes., a total of 147 minutes. The hearing on June 20, 2017 began
3 at 1:59 minutes and closed 5:41 minutes for a total of 222 minutes. (Ex. 4.)

4 Altogether the public hearing total 535 minutes, or about 9 hours. (Ex. 4; Taylor decl., para. 4.)

5 On average, each hour of hearing typically produces roughly 50 pages of transcript. (Evans
6 decl., para. 12.) Nine hours of hearing should produce about 450 pages of transcripts.

7 The County uses Redwood Litigation Services. (Ex. 3.) According to Redwood Litigation
8 Service's charge sheet, they charge \$4.55 per page for an original transcript and one copy. An
9 appearance fee is \$75 for ½ day. (Ex. 2).

10 At \$4.55 per page, 450 pages of transcript should cost \$2,047.50. The County's estimate of
11 \$11,000 to prepare around 450 pages of transcript works out to a cost of \$24.44 per page. (Evans decl.,
12 para. 12.)

13 Dividing Redwood's charge of \$4.55 per page into \$11,000 gives us a total of 2,417 pages of
14 transcript, far in excess of the 450 pages on average normally expected to result from transcribing 9
15 hours of testimony. (Evans decl., para. 12.)

16 Petitioner has offered to waive the transcripts in this case, which the County refuses to do.
17 (Evans decl., para.13.)

18 6. Petitioner's attempts to resolve the issues

19 At the County's request, Petitioner granted the County three extensions of time, totaling 150
20 days, in which to prepare the AR. The AR is now due to be certified and lodged by February 9, 2018.
21 (Evans decl., para. 6.)

22 On September 5, 2017, the parties stipulated to preparation of an electronic AR in order to
23 reduce costs. (Evans decl., para. 7.)

24 By email dated November 27, 2017, Petitioner requested information to support the County's
25 demand for \$50,000. County Counsel provided no new information. Instead, County Counsel provided
26 the same breakdown of tasks it had provided with its letter of November 20, 2017, plus an email from
27 its court reporter regarding the court reporter's "high" estimate of costs. (Evans decl., para. 9; Ex. 3.)
28

1 Petitioner has offered to prepare the AR itself, subject to the County's review and certification.
2 Petitioner further offered to waive transcript of the public hearings held by the County. The County has
3 rejected these reasonable offers to expedite preparation of the AR and to reduce the cost of preparing
4 the AR. (Evans decl., para. 10.)

5 On December 5, 2017, attorneys for Petitioner, County Counsel and RPI participated in a
6 lengthy conference call to meet and confer regarding preparation of the AR. The County and RPI
7 represented to Petitioner that they have reduced the record to between 360,000-700,000, most of which
8 is a large volume of duplicative County department staff emails plus attachments. The County made no
9 effort to define the relevance of these duplicative County department staff emails to the issues before
10 the Court. RPI represented to Petitioner that these duplicative emails fell within the "catchall"
11 provisions of PRC section 21167.6. The County rejected Petitioner's renewed offer to prepare the AR
12 subject to the County's review. The County again refused to provide Petitioner with a list of the
13 documents it believes are necessary for inclusion in the AR, saying that production of such a list would
14 drive up the cost of preparing the AR. (Evans decl., para. 11.)

15 Because the parties were unable to resolve the issue of the reasonable cost to prepare the AR
16 and because the County's estimated cost is unreasonable and prohibitive, Petitioner is forced to file this
17 motion to bring the issue to the Court for resolution.

18 III. ARGUMENT

19 1. Key Law

20 The Public Resources Code ("PRC") requires a public agency to prepare and certify the AR
21 within 60 days of request unless the parties stipulate otherwise. (PRC sec. 21167.6(b)(1).) The parties
22 shall pay the reasonable cost of preparing the record. (Id.) Alternatively, the petitioner may prepare the
23 AR, or the parties may stipulate to an alternate method of preparing the AR, subject to certification by
24 the public agency. (PRC sec. 21167.6(b)(2).)

25 If the public agency fails to prepare and certify the record within the time limit established
26 above, or any continuances of that time limit, the petitioner may move for sanctions, and the Court
27 may, upon that motion, grant appropriate sanctions. (PRC sec. 21167.6(d).)

1 A petitioner may, by interim motion, challenge an agency's record preparation charge as
2 excessive or unreasonable. (*Coalition for Adequate Review v. City and County of San Francisco* (2014)
3 229 Cal.App.4th at 1043, 1053.) Whether a particular cost to prepare an administrative record was
4 necessary and reasonable is an issue addressed to the sound discretion of the trial court. (Id. at 1051.)

5 2. The County's Inflated Cost Estimate

6 The AR should not contain extraneous and irrelevant material. The party preparing the record
7 must strive to do so at reasonable cost in light of the scope of the record. (PRC sec. 21167.6(f).) The
8 costs must be both reasonable and necessary. (*Coalition for Adequate Review, supra* 229 Cal.App.4th at
9 1051.) The general rules applicable to the award of costs set forth in Code of Civil Procedure sections
10 1032, 1033 and 1033.5 apply to determination of reasonable costs or fees found in PRC sec.21167.6.
11 (*St. Vincent's School for Boys v. City of San Rafael* (2008) 161 Cal.App.4th 989, 1013.)

12 PRC sec. 21167.6(e) provides that the record shall include the following items:

13 "(1) All project application materials.

14 (2) All staff reports and related documents prepared by the respondent public agency with
15 respect to its compliance with the substantive and procedural requirements of this division and with
16 respect to the action on the project.

17 (3) All staff reports and related documents prepared by the respondent public agency and
18 written testimony or documents submitted by any person relevant to any findings or statement of
19 overriding considerations adopted by the respondent agency pursuant to this division.

20 (4) Any transcript or minutes of the proceedings at which the decisionmaking body of the
21 respondent public agency heard testimony on, or considered any environmental document on, the
22 project, and any transcript or minutes of proceedings before any advisory body to the respondent public
23 agency that were presented to the decisionmaking body prior to action on the environmental documents
24 or on the project.

25 (5) All notices issued by the respondent public agency to comply with this division or with any
26 other law governing the processing and approval of the project.

27 (6) All written comments received in response to, or in connection with, environmental
28 documents prepared for the project, including responses to the notice of preparation.

1 (7) All written evidence or correspondence submitted to, or transferred from, the respondent
2 public agency with respect to compliance with this division or with respect to the project.

3 (8) Any proposed decisions or findings submitted to the decisionmaking body of the respondent
4 public agency by its staff, or the project proponent, project opponents, or other persons.

5 (9) The documentation of the final public agency decision, including the final environmental
6 impact report, mitigated negative declaration, or negative declaration, and all documents, in addition to
7 those referenced in paragraph (3), cited or relied on in the findings or in a statement of overriding
8 considerations adopted pursuant to this division.

9 (10) Any other written materials relevant to the respondent public agency's compliance with this
10 division or to its decision on the merits of the project, including the initial study, any drafts of any
11 environmental document, or portions thereof, that have been released for public review, and copies of
12 studies or other documents relied upon in any environmental document prepared for the project and
13 either made available to the public during the public review period or included in the respondent public
14 agency's files on the project, and all internal agency communications, including staff notes and
15 memoranda related to the project or to compliance with this division.

16 (11) The full written record before any inferior administrative decisionmaking body whose
17 decision was appealed to a superior administrative decisionmaking body prior to the filing of
18 litigation.”

19 The County and RPI advised Petitioner that the bulk of the estimated 360,000-700,000 pages of
20 documents they claim to be reviewing fall within the “catchall” provisions of subsection (10) above.

21 PRC sec. 21167.6(e) requires that documents, including “internal agency communications,”
22 must be “relevant to the respondent public agency's compliance with this division or to its decision on
23 the merits of the project....” The County has made no effort to show Petitioner how hundreds of
24 thousands of pages of duplicative staff emails are related to the County’s decision to proceed with this
25 project or relevant to the issues before this court.

26 Further, the law charges Petitioner with paying the reasonable costs of *preparing* the AR. PRC
27 sec. 21167.6(e)(1) through (9) requires the AR to include a specified list of documents such as project
28 application materials, notices, agendas, public comment, staff reports and supporting materials, all of

1 which are maintained on the County's websites. The County has all relevant documents close at hand
2 and readily available. These documents have been compiled by Petitioner and are approximately 4,152
3 pages not including communications between the County and RPI or the public. (Ex. 4.)

4 The County, however, seeks to charge Petitioner for searching for other "catchall" documents
5 from all departments which include the word "Chanate." Not surprisingly, the County came up with 18
6 GB of data resulting from its overly broad search.

7 The County has refused to illuminate Petitioner about the specific documents it has scooped up,
8 but its broad search would presumably turn up documents related to the County Morgue, the old
9 Community Hospital, Sutter Hospital, the Bird Rescue Center, and other public buildings located on the
10 Chanate Campus. The County's broad search includes documents referencing not only the Chanate
11 project, but also Chanate Road, all addresses on Chanate Road and all references to Chanate Road. It is
12 readily apparent that the County's search is unnecessarily broad and would produce an overwhelming
13 number of documents that are not relevant to the issues before this Court and were not relied upon by
14 the Board of Supervisors in making its decision on this project.

15 Documents that were not part of the history of the project leading up to final approval need not
16 be included in the AR. (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1,
17 27.) Costs incurred for documents that are not included in an administrative record are not recoverable.
18 (*Ralph's Chrysler-Plymouth v. New Car Dealers Policy & Appeals Board* (1973) 8 Cal.3d 792, 797.) It
19 follows, therefore, that Petitioner cannot be charged for searching for, reviewing and eliminating a
20 massive number of documents that were not relied upon by the Board of Supervisors, not provided to
21 the public, not included the County's file on the project, and not relevant to the issues before this Court.

22 Further, allowing the County to charge Petitioner with the cost of collecting all County
23 documents containing the word "Chanate" maintained by all County departments, encourages a public
24 agency to do what the County did here--fail to keep a public project file in some semblance of order on
25 an important and controversial project, to the detriment of the public. In this case, when at least one
26 member of the public asked to review the County's file on this project, he was told there was no file.
27 He was also told by the General Services Department that the County did not know which departments
28

1 might have files. (Barnes decl., para. 7.) Petitioner should not be held responsible to pay the cost for the
2 County's failure to perform one of the simplest and most basic of administrative tasks.

3 The County itself estimates the cost of actually preparing the AR at \$12,500. (Ex. 1.) The
4 County estimates the cost of reviewing and certifying the AR at \$2,500. While possibly on the high
5 side, these costs are not entirely unreasonable for the actual assembly, organizing, indexing and Bate-
6 stamping of relevant documents to include in the record.

7 For these reasons, this Court should establish the cost of preparing the AR at no more than
8 \$15,000. The cost of preparing the transcripts of the public hearings should not exceed \$2,047.50, as set
9 forth above, plus \$1,000 to prepare transcripts of announcements of closed sessions. Alternatively, this
10 Court could order Petitioner to prepare the AR, subject to review and certification by the County.

11 3. Sanctions

12 Petitioner is entitled to sanctions for being forced to bring this motion. If the public agency fails
13 to prepare and certify the record within the time limit established in PRC section 21167.(b)(1), or any
14 continuances of that time limit, the plaintiff or petitioner may move for sanctions, and the court may,
15 upon that motion, grant appropriate sanctions. (PRC sec. 21167.6(d).)

16 As set forth above, the County has all--or nearly all--relevant documents already assembled on
17 the County's website and has provided other documents in response to PRA requests. Despite the fact
18 that these documents are all readily accessible, the County has obtained an additional 150 days to
19 prepare the AR by stipulation of and estimates the cost of preparing the AR to be a minimum of
20 \$50,000, even though there are no technical reasons for this cost and delay and even though the County
21 exempted this project from the mandates of CEQA and did not prepare an Initial Study, an EIR, or any
22 of the other technical studies usually required by CEQA or take public comment or hold public
23 hearings as required by CEQA. The County has included in its estimate of costs review of 1 million
24 pages of documents found by the County in an unreasonably broad search of County records which
25 were dispersed among numerous County departments, the bulk of which are not related to the actual
26 preparation of the AR.

27 The County of Sonoma has unreasonably and without explanation refused to cooperate with
28 Petitioner to reduce the cost of preparing the AR. The County has rebuffed all of Petitioner's attempts

1 to reduce the costs of preparing the AR. Petitioner offered to review the material, but the County
2 rejected Petitioner's offer. Petitioner stipulated to preparation of an electronic AR instead of a printed
3 AR, to which the County agreed. Petitioner offered to waive transcript of the public hearings. Petitioner
4 even offered to prepare the AR itself, subject to the County's review. But the County refuses to
5 cooperate.

6 For these reasons, Petitioner requests this court to award its reasonable attorney's fees of \$8,280
7 incurred to bring this motion to enforce the provisions of PRC sec. 21167.6. (Evans decl., para. 14.)

8 IV. RELIEF REQUESTED

9 Petitioner FRIENDS OF CHANATE respectfully requests this Court to set the reasonable cost
10 of preparing the AR as not more than \$15,000 and preparation of the transcripts in this case at no more
11 than \$3,047.50 or, alternatively, to order Petitioner to prepare the AR, and to award Petitioner the
12 amount of \$8,280 in sanctions for being forced to bring this motion.

13 Dated: December 12, 2017

O'BRIEN WATTERS & DAVIS, LLP

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15 By: Noreen M. Evans
16 Noreen M. Evans
17 Attorney for Petitioner and Plaintiff
18 Friends of Chanate
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