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January 12, 2005

Central Coast Regional Water Quality Control Board 895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401

Attention: Sue Gerdsen - File Review Request

Re: David Pierson/Goldie Lane Property - San Luis Obispo County, California

Dear Ms. Gerdsen:

Pursuant to the California Public Records Act, on behalf of Mr. Pierson, we request the following documents be made available for review and copying.

- 1. All complaints, requests for investigation or other such items, whether telephonic, in person or in writing, leading to the investigation of the property known as the Goldie Lane Property (hereinafter "Site") by Ryan Lodge on 9/20/02 as set forth in Mr. Briggs' letter to David Pierson of 10/10/02 (typed as 10/8/03 and changed by handwriting insertion to 10/10/02).
- 2. All notes and photographs taken by Ryan Lodge on or in reference to his 9/20/02 visit to the Site.
- 3. All notes of discussions with or by Ryan Lodge with any other RWQCB employee or agent regarding his 9/20/02 visit to the Site.
- 4. All notes of the reviewer of the SWPPP provided to the RWQCB in 2002, including but not limited to any and all notes of conversations with owners consultants, RWQCB staff or anyone else, relating to the review of the SWPPP
- 5. All documents indicating the basis for the reviewer (see above) stating, "Erosion control seems inadequate."
- 6. All documents indicating the basis for the reviewer (see above) for stating that certain items were incomplete in the SWPPP.
- 7. All licenses, certificates or other such evidence of training relating to the reviewer's (see above) ability to review and comment on a SWPPP in and around 11/02.

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- 8. All complaints, requests for investigation or other such items, whether telephonic, in person or in writing, leading to the Site visit by Ryan Lodge on 11/08/02
- 9. All notes and photographs taken by Ryan Lodge on or in reference to his 11/08/02 visit to the Site.
- 10. All notes of discussions with or by Ryan Lodge with any other RWQCB employee or agent regarding his 11/08/02 visit to the Site.
- 11. All documents, including but not limited to notes, letters and emails, relating to any contact and/or communication with each of the following persons: Sarah Christie, Gordon Hesley, Babak Naficy and Pam Heatherington relating to the Site.
- 12. All complaints, requests for investigation or other such items, whether telephonic, in person or in writing, leading to the Site visit by the RWQCB on 12/20/02
- 13. All notes and photographs taken by the RWQCB on or in reference to the 12/20/02 visit to the Site.
- 14. All notes of discussions with or by the person visiting the Site on 12/20/02 and any other RWQCB employee or agent regarding the 12/20/02 visit to the Site.
- 15. Any and all calculations as to the amount of sediment, if any, discharged to the "blue line creek" as set forth in Paragraph No. 2 of CAO R3-2003-0021.
- 16. All documents that indicate what specific area of the site did not have erosion control as indicated in Paragraph No. 3 of CAO R3-2003-0021.
- 17. All complaints, requests for investigation or other such items, whether telephonic, in person or in writing, leading to the Site visit by the RWQCB on 2/13/03
- 18. All notes and photographs taken by the RWQCB on or in reference to their 2/13/03 site visit.
- 19. All notes of discussions with or by the person inspecting the site on 2/13/03 and any other RWQCB employee or agent regarding the 2/13/03 site visit.
- 20. All documents that indicate the exact time the RWQCB staff was on Site during the site visit of 2/13/03.
- 21. All notes by Ryan Lodge of his telephone conversation with Jeffery Emerick on 2/25/03.

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- 22. All documents reflecting any memoranda, notes or other communications with anyone at the RWQCB by Ryan Lodge relating to his telephone conversation with Jeffery Emerick on 2/25/03.
- 23. All complaints, requests for investigation or other such items, whether telephonic, in person or in writing, leading to the Site visit by the RWQCB on 2/28/03
- 24. All notes and photographs taken by the RWQCB on or in reference to his 2/28/03 visit to the Site.
- 25. All notes of discussions with or by the person visiting the Site on 2/28/03 and any other RWQCB employee or agent regarding the 2/28/03 visit to the Site.
- 26. All notes and drafts relating to the Staff Report authored by Ms. Donnette Dunaway presented at the hearing of February 6, 2004.
- 27. Any and all internal notes, memorandums or other documentation regarding Ms. Donnette Dunway's comments regarding the Site and/or the action taken by the RWQCB at the February 6, 2004 hearing.
- 28. Any and all internal notes, memorandums or other documentation regarding the site authored and/or received by Bruce Payne, Brad Hagemann, Jennifer Bitting, Chris Adair and Mark Angelo.
- 29. All records of sediment loading from any source of the Huerhuero Creek during the time period of 8/01/02 to the present.
- 30. Any and all internal notes, memorandums or other documentation referencing this Site, regarding Sarah Christie's position with the California Coastal Commission.
- 31. All notes of discussions with or by any person visiting the Site at any time not listed above and any other RWQCB employee or agent regarding the Site visit.

Thank you.

Steven L.\Hdch

For HATCH & PARENT

Law Corporation

SLH

cc: Mr. David Pierson