



May 28, 2021

Ms. Adena M. Hopenstand
Deputy City Attorney
Office of the City Attorney
City of Los Angeles
200 N. Main Street, 7th Floor
Los Angeles, CA 90012

Street Address:
18700 Ward Street
Fountain Valley, California 92708

Mailing Address:
P.O. Box 20895
Fountain Valley, CA 92728-0895

(714) 963-3058
Fax: (714) 964-9389
www.mwdoc.com

Sat Tamaribuchi
President

Megan Yoo Schneider, P.E.
Vice President

Larry D. Dick
Director

Bob McVicker, P.E., D.WRE
Director

Al Nederhood
Director

Karl W. Seckel, P.E.
Director

Jeffery M. Thomas
Director

Robert J. Hunter
General Manager

MEMBER AGENCIES

City of Brea
City of Buena Park
East Orange County Water District
El Toro Water District
Emerald Bay Service District
City of Fountain Valley
City of Garden Grove
Golden State Water Co.
City of Huntington Beach
Irvine Ranch Water District
Laguna Beach County Water District
City of La Habra
City of La Palma
Mesa Water District
Moulton Niguel Water District
City of Newport Beach
City of Orange
Orange County Water District
City of San Clemente
City of San Juan Capistrano
Santa Margarita Water District
City of Seal Beach
Serrano Water District
South Coast Water District
Trabuco Canyon Water District
City of Tustin
City of Westminster
Yorba Linda Water District

SENT VIA U.S. MAIL AND EMAIL

RE: Public Records Act Request

Dear Ms. Hopenstand:

I am requesting access to or copies of records in possession or control of the City of Los Angeles, Department of Public Works, Bureau of Sanitation, and/or Bureau of Streets pursuant to the California Public Records Act, California Government Code § 6250 et seq. ("CPRA"), and Article I, § 3(b) of the California Constitution. The records I seek are described below. As used herein, "Record" includes "Public Records" and "Writings" as those terms are defined at Government Code § 6252(e) & (g).

Please note that the Public Records Act allows a member of the public to request records by describing their content, rather than asking for specific documents by name; an agency that receives such a request must "search for records based on criteria set forth in the search request." I request the following records:

1. A complete list of union grievances or copies of the grievances, listed by union and by year for the calendar years 2008 through 2018 filed in regards to the Bureau of Sanitation and/or Wastewater Collection Services;
2. A complete list or copies of complaints made against the Bureau of Sanitation and/or Wastewater Collection Services or their employees for the same period regarding discrimination, harassment, retaliation, hostile work environment, or unsafe working conditions;
3. A complete list or copies of all lawsuits and settlements regarding the Bureau of Sanitation and/or Wastewater Collection Services or their employees for the same period;
4. The same information requested in items 1-3 but for the Bureau of Streets (Streets LA) or their employees for the calendar years 2018 through 2020.

If you contend that any portion of the records requested is exempt from disclosure by express provisions of law, Government Code § 6253(a) requires segregation and redaction of that material in order that the remainder of the records may be released. If you contend that any express provision of law exists to exempt from disclosure all or a portion of the records I have requested, Government Code § 6253(c) requires that you notify me of the reasons for the determination not later than 10 days from your receipt of this request. Government Code §§ 6253(d) & 6255(b) require that any response to this request that includes a determination that the request is denied, in whole or in part, must be in writing and include the name and title of the person(s) responsible for the City's response.

Government Code § 6253(d) prohibits the use of the 10-day period, or any provisions of the CPRA or any other law, “to delay access for purposes of inspecting public records.” In responding to this request, please keep in mind that Article 1, § 3(b)(2) of the California Constitution expressly requires you to broadly construe all provisions that further the public’s right of access, and to apply any limitations on access as narrowly as possible.

This request applies to all records in your agency’s possession, including documents created by a member of another government agency or a member of the public. If specific portions of any documents are exempt from disclosure, please provide the non-exempt portions. If you maintain records or data in electronic format, please provide them in that same format to avoid copying costs.

If I can provide any clarification that will help expedite your attention to my request, please contact me at rhunter@mwdoc.com or 714.593.5026. I ask that you notify me of any duplication costs exceeding \$200 before you duplicate the records so that I may decide which records I want copied.

Thank you for your timely attention to this matter.

Sincerely,



Robert J. Hunter, General Manager
Municipal Water District of Orange County