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Via Email and U.S. Mail

August 2, 2018

Scott Johnson, Associate Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95881
srjohnson@cityofsacramento.org

Ryan Devore, Director of
Community Development Department
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95881
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Mindy Cuppy, MMC
City Clerk, City of Sacramento
915 I Street
New City Hall
Sacramento, CA 95814
clerk@cityofsacramento.org

**Re: Comment on We Grow California Cannabis Campus Project (P17-020)
Initial Study | Mitigated Negative Declaration**

Dear Mr. Johnson, Mr. Devore, and Ms. Cuppy:

I am writing on behalf of the **Laborers International Union of North America, Local Union 185** and its members living in Sacramento County and/or the City of Sacramento (“LiUNA”), regarding the Initial Study and Mitigated Negative Declaration (“IS/MND”) prepared for the Project known as We Grow California Cannabis Campus (City File No. P17-020) for Applicant We Grow California, including all actions related or referring to the proposed development of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary, located at 8280 Elder Creek Road (“Project”) in the City of Sacramento, in Sacramento County, California. APNs: 064-0010-028 and 064-0010-053.

After reviewing the IS/MND, we conclude the IS/MND fails as an informational document, and that there is a fair argument that the Project may have adverse environmental

impacts. Therefore, we request that the City of Sacramento (“City”) prepare an environmental impact report (“EIR”) for the Project pursuant to the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000, et seq. We reserve the right to supplement these comments during public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

We hereby request that the City of Sacramento (“City”) send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report (“EIR”) is required for a project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
 - Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
 - Notice of any Final EIR prepared pursuant to CEQA.
 - Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092,** which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

In addition, we request that the City send to us via email, if possible or U.S. Mail a copy of all Planning Commission and City Council meetings and/or hearing agendas.

Please send notice by electronic mail, if possible or U.S. Mail to:

Richard Drury
Theresa Rettinghouse
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
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theresa@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Richard T. Drury
Lozeau Drury LLP
Attorneys for LIUNA Local Union No.185

From: [Theresa Rettinghouse](#)
To: [Scott Johnson](#); [Ryan DeVore](#); [clerk](#)
Cc: [Richard Drury](#)
Subject: MND Comments for We Grow California Cannabis Campus Project (P17-020)
Date: Thursday, August 2, 2018 4:43:29 PM
Attachments: [2018.08.02 MND Comment Ltr We Grow Cannabis Campus.pdf](#)

Dear Mr. Johnson, Mr. Devore, and Ms. Cuppy:

Attached please find the comments from Laborers International Union of North America, Local Union 185 and its members living in Sacramento County and/or the City of Sacramento ("LiUNA"), regarding the Initial Study and Mitigated Negative Declaration ("IS/MND") prepared for the Project known as We Grow California Cannabis Campus (City File No. P17-020) for Applicant We Grow California, including all actions related or referring to the proposed development of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary, located at 8280 Elder Creek Road ("Project") in the City of Sacramento, in Sacramento County, California. APNs: 064-0010-028 and 064-0010-053.

Please include these comments in the administrative record for this matter.

Thank you,
Theresa

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Theresa Rettinghouse
Paralegal
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This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail Theresa@lozeaudrury.com, and delete the message.