

RECEIVED

DEC 19 2018

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES



LOZEAU DRURY

T 510 836 4200
F 510 836 4205

410 12th Street, Suite 250

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and Overnight Mail

December 18, 2018

Diana Robinson, Planner
Planning & Development Services Department
Planning Division
Imperial County
801 Main Street
El Centro, CA 92243-2811
dianarobinson@co.imperial.ca.us

Paul Foulger, Planning Division Manager
Planning & Development Services Department
Planning Division
Imperial County
801 Main Street
El Centro, CA 92243-2811
paulfoulger@co.imperial.ca.us

Jim Minnick, Director of
Planning & Development Services Department
Planning Division
Imperial County
801 Main Street
El Centro, CA 92243-2811
jimminnick@co.imperial.ca.us

Chuck Storey, County Clerk
County Clerk/Recorder Department
Imperial County
940 W. Main Street, Suite 202
El Centro, CA 92243
virginiauwong@co.imperial.ca.us,
alejandraquezada@co.imperial.ca.us
joannalerno@co.imperial.ca.us

Re: Comment on the Desert Highway Farms, LLC Project (GPA #18-0002, ZC #18-0003, TR #00991, CUP #18-0016, IS #18-0011 & SCH #2018111046) Initial Study | Mitigated Negative Declaration

Dear Ms. Robinson, Mr. Foulger, Mr. Minnick and Mr. Storey:

I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in Imperial County ("LIUNA"), regarding the Initial Study and Mitigated Negative Declaration ("IS/MND") prepared for the Project known as the Desert Highway Farms, LLC Project (GPA #18-0002, ZC #18-0003, TR #00991, CUP #18-0016, IS #18-0011 & SCH #2018111046) for Solana Energy Farms 1, LLC, including all actions related or referring to the development of an indoor cannabis cultivation facility in phases beginning with three +/- 33,807 square foot buildings located at 2085 W. Hwy 78, Assessor Parcel Number (APN) 0133-210-720 in Borrego, Springs, CA ("Project").

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,

December 18, 2018

Comment on the Desert Highway Farms, LLC Project (GPA #18-0002, ZC #18-0003, TR #00991, CUP #18-0016, IS #18-0011 & SCH #2018111046) Initial Study | Mitigated Negative Declaration

Page 2 of 2

we request that Imperial County ("County") 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).

Sincerely,



Richard Drury
Lozano | Drury LLP