

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660
FAX: (650) 589-5062

ssannadan@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201
FAX: (916) 444-6209

DANIEL L. CARDOZO
CHRISTINA M. CARO
THOMAS A. ENSLOW
ANDREW J. GRAF
TANYA A. GULESSERIAN
KENDRA D. HARTMANN*
KYLE C. JONES
RACHAEL E. KOSS
NIRIT LOTAN
AARON M. MESSING
WILLIAM C. MUMBY

MARC D. JOSEPH
Of Counsel

*Admitted in Colorado

May 26, 2020

Via Email and U.S. Mail

Aaron Bock, Director
Resource Management Agency
County of Tulare
5961 S. Mooney Blvd.
Visalia, CA 93277
Email: abock@co.tulare.ca.us

Melinda Benton, Chief Clerk
Tulare County Board of Supervisors
2800 W. Burrel Ave.
Visalia, CA 93291
Email: mbenton@co.tulare.ca.us;
Clerkoftheboard@co.tulare.ca.us

Via Email Only

Hector Guerra, Chief Environmental Planner
Email: HGuerra@co.tulare.ca.us

Re: Request for Immediate Access to Documents Referenced in the Mitigated Negative Declaration - Angela Solar Project (Special Use Permit PSP 19-083)

Dear Mr. Bock, Ms. Benton, and Mr. Guerra:

We are writing on behalf of California Unions for Reliable Energy (“CURE”) to request *immediate access* to any and all documents referenced or relied upon in the Mitigated Negative Declaration (“MND”) prepared for the Angela Solar Project (Special Use Permit PSP 19-083) (“Project”), proposed by Angiola East, LLC. Our request for all documents referenced or relied upon in the MND is made pursuant to the California Environmental Quality Act (“CEQA”), which requires that all documents referenced in an environmental review document be made available to the public for the entire comment period.¹ This request excludes any documents that are otherwise available on the County of Tulare website.²

¹ See Pub. Resources Code, § 21092, subd. (b)(1); 14 Cal. Code Reg. § 15072, subd. (g)(4).

² <https://tularecounty.ca.gov/county/>, accessed May 26, 2020.
4851-003acp

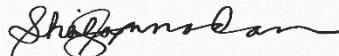
May 26, 2020
Page 2

The Project proposes to construct a 40 megawatt (MW) solar generation facility located on approximately 277 acres in Tulare County, California. The project will primarily consist of photovoltaic panels, a single axis tracker system, inverters and transformers, electric cabling and communication lines, on-site switchgear, generation-tie lines, access roads, and a security fence. The project also includes an approximate 1-mile transmission line that will interconnect at the Olive Substation and may include an 80 megawatt-hour (MWhr) battery storage component. The Project site is located on two noncontiguous sites along Avenue 42, approximately two miles southeast of the community of Alpaugh. The Assessor's Parcel Numbers (APNs) are 330-100-026, -045, - 046, 330-110-007, - 013, and 330-130-005, -006, - 007, -031.

Pursuant to Government Code section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into chunks of 10 MB or less), please email them to ssannadan@adamsbroadwell.com as attachments. If any of the requested items are available on the Internet, we request that the County direct us to the appropriate electronic link(s) for accessing the documents.

I will be calling you to arrange for duplication/transmission of the documents. If you have any questions, please call me at (650) 589-1660. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:acp

4851-003acp