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*Of Counsel*  
MARC D. JOSEPH  
DANIEL L. CARDOZO

May 8, 2024

**Via Email and U.S. Mail**

Brian D. Bordona, Director  
County of Napa Planning, Building, and  
Environmental Services Department  
1195 Third Street  
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**Via Email Only**

Matt Ringel, Planner II, County of Napa  
[Matthew.ringel@countyofnapa.org](mailto:Matthew.ringel@countyofnapa.org)

**Re: Request to Extend MND Public Comment Period / Untimely Response to CEQA Reference Request and Public Records Act Request – Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) (SCH 2024040604)**

Dear Mr. Bordona and Mr. Ringel:

On behalf of **California Unions for Reliable Energy (“CURE”)**, we respectfully request that the County of Napa (“County”) extend the public review and comment period on the Mitigated Negative Declaration (“MND”) for the Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) (SCH 2024040604) (“Project”), proposed by Dynamo Solar LLC (“Applicant”) **by at least 30 days** due to the County’s failure to provide timely access to the supporting documents for the MND. This request is made pursuant to the California Environmental Quality Act (“CEQA”) which requires that “all documents referenced in the draft environmental impact report or negative declaration” be available for review and “readily accessible” during the entire comment period.<sup>1</sup>

<sup>1</sup> PRC §§ 21092(b)(1) (emphasis added); 14 Cal. Code Regs. (“CCR”) § 15072(g)(4). 7180-005j

The Project proposes approximately 56 acres of floating solar panels, creation of an approximately 0.13-acre interconnection electrical substation, approximately 2 miles of electrical transmission route, and the 0.9-acre expansion of an existing PG&E electrical substation. Access to the floating solar array parcels is located off of Soscol Ferry Road, approximately 0.1 miles due south of the boundaries of the City of Napa and approximately 1.5 miles due north of the City of American Canyon. The proposed transmission route is south of the boundaries of the City of Napa. The proposed PG&E electrical substation expansion is approximately 0.15 miles due east of the boundaries of the City of Napa. The approximately 56-acre floating solar panel array is proposed to be installed atop existing wastewater settling ponds located at the Napa Sanitation District facility on APNs 057-010-010-00 and 057-050-003-00. The Napa Sanitation District parcels are approximately 327.0 and 163.59 acres in size and include a wastewater treatment facility and associated infrastructure.

The MND was released for public review on April 12, 2024. The public review and comment period currently ends on May 13, 2024.<sup>2</sup>

On April 17, 2024, CURE submitted a letter to the County pursuant to CEQA Section 21092(b)(1) requesting “***immediate access to any and all documents referenced or relied upon***” in the MND (“MND Request”).<sup>3</sup> Additionally, on April 17, 2024, CURE submitted a separate letter to the County pursuant to California Public Records Act (“CPRA”), Government Code §§ 6250, et seq. and Article I, section 3(b) of the California Constitution, requesting access to “***any and all public records referring or related***” to the Project (“PRA Request”).<sup>4</sup> The MND Request and the PRA Request were sent separately to avoid confusion as to what documents and records were sought.

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<sup>2</sup> State of California, CEQANet, Dynamo Solar Commercial Floating Solar Use Permit (P22-00340-UP), Zone Change (P23-00181-ZC), and Variance (P23-00268-VAR), (April 12, 2024) available at <https://ceqanet.opr.ca.gov/2024040604>.

<sup>3</sup> **Exhibit A:** Letter from ABJC re Request for Immediate Access to Documents Referenced or Relied Upon in the Mitigated Negative Declaration (MND) (SCH 2024040604) for the Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) (April 17, 2024).

<sup>4</sup> **Exhibit B:** Letter from ABJC re Public Records Act Request - Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) (April 17, 2024).

On April 29, 2024, the County responded to the PRA Request stating that the County needed additional time to respond to the PRA Request and would make a determination regarding release of responsive documents by May 13, 2024.<sup>5</sup> To date, the County has not acknowledged, nor provided documents in response to, the MND Request.

### A. CEQA Violations

CEQA requires that “all documents referenced” – and the CEQA Guidelines require that “all documents incorporated by reference” – in a mitigated negative declaration shall be “readily accessible to the public during the lead agency’s normal working hours” during the entire public comment period.<sup>6</sup> Further, a CEQA document may not rely on hidden studies or documents that are not provided to the public.<sup>7</sup> **The County is in violation of these requirements because the County has failed to provide CURE with access to the MND reference documents despite a timely request for access that was made three weeks ago.**

Without access to these critical MND reference documents during the public comment period on the MND, CURE and other members of the public are precluded from having the meaningful opportunity to comment on the MND that is required by CEQA. The County’s failure to make the underlying MND documents available during the entire comment period makes public review particularly burdensome in this case because of the MND’s reliance on missing documents for significance determinations and mitigation measures to address the Project’s air quality, health risk, and biological resources impacts, for example. Without having access to these documents, CURE and other members of the public are unable to evaluate the accuracy of the County’s impact analysis, or the efficacy of the County’s proposed mitigation measures. Additionally, the size of the MND and the Project’s complexity make it difficult to effectively comment on the MND without the referenced documents by the current comment deadline of May 13, 2024.

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<sup>5</sup> **Exhibit C:** County of Napa, Public Records Request Portal, Request No. 24-358 (Accessed May 7, 2024).

<sup>6</sup> Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15072(g)(4); see *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

<sup>7</sup> *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 (“Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.”).

During our review of the MND, we have identified a number of documents and files that are referenced in the MND which are not accompanied by weblinks and have not been provided in response to our MND Request. These reference documents are critical to understanding and commenting on the MND's analysis of the Project's impacts to several critical resource areas, including, in particular, the analysis of the Project's air quality, health risk, wildfire, and biological impacts. The missing reference documents includes, but is not limited to, the following:

- Sustaita, D, L Barthman-Thompson, P Quickert, L Patterson, and S Estrella. 2005. Annual Salt Marsh Harvest Mouse Demography and Habitat Use in Suisun Marsh Conservation Areas. Presentation at the CALFED Science Conference.
- USFWS. 2013. Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California. Sacramento, California. xviii + 605 pp.
- U.S. Fish and Wildlife Service (USFWS). 1984. Salt marsh harvest mouse and California clapper rail recovery plan. Portland, Oregon.
- Zeiner, DC, WF Laudenslayer, Jr., KE Juneer, and M White. 1990. California's Wildlife, Volume III: Amphibians and Reptiles, Birds, Mammals. California Statewide Wildlife Habitat Relationships System, California Department of Fish and Game, Sacramento, CA.
- USACE. 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). J.S. Wakeley, R.W. Lichvar, and C.V. Noble (eds). ERDC/EL TR- 08-28. Vicksburg, MS: U.S. Army Engineer Research and Development Center.
- Thomson, Robert C., Amber N. Wright, and H. Bradley Shaffer. 2016. California Amphibian and Reptile Species of Special Concern. California Department of Fish and Wildlife University Press.
- Sustaita, D, PF Quickert, L Patterson, L Barthman-Thompson, S Estrella. 2011. Salt Marsh Harvest Mouse Demography and Habitat Use in Suisun Marsh, California. The Journal of Wildlife Management 75(6): 1498-1507.

- Shuford, WD, and T Gardali (eds). 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and CDFG, Sacramento.
- Spautz, H., N. Nur, and D. Stralberg. 2005. California Black Rail (*Laterallus jamaicensis coturniculus*) Distribution and Abundance in Relation to Habitat and Landscape Features in the San Francisco Bay Estuary. USDA Forest Service Gen. Tech. Rep. PSW-GTR-191: 465-468.
- Sustaita, D, L Barthman-Thompson, P Quickert, L Patterson, and S Estrella. 2005. Annual Salt Marsh Harvest Mouse Demography and Habitat Use in Suisun Marsh Conservation Areas. Presentation at the CALFED Science Conference.
- PG&E. 2015. Raptor Safe Construction and Wildlife Protection. Issued by R. Kihara. July 31, 2015.
- Pierson, ED, Rainey, WE, and C. Corben. 2006. Distribution and Status of Western Red Bats (*Lasiurus blossevillii*) in California. California. Department of Fish and Game, Habitat Conservation Planning Branch, Species Conservation and Recovery Program Report 2006- 004, Sacramento, CA 45pp.
- Pacific Gas and Electric (PG&E). 2008. Raptor Concentration Zones for Overhead Lines. Issued by C.A. Partridge. July 15, 2008.
- Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. (Technical Report Y-87-1). Vicksburg, MS: U.S. Army Waterways Experiment Station.
- Fisler, GF. 1965. Adaptations and speciation in harvest mice of the marshes of San Francisco Bay. University of California Publications in Zoology 77: 1-108.
- Hamilton III, WJ and RJ Meese. 2006. Habitat and population characteristics of Tricolored Blackbird colonies in California. 2005 final report. U.C. Davis for California Department. Of Fish and Game.

- Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, editors. 2012. *The Jepson manual: vascular plants of California*, second edition. University of California Press, Berkeley.
- Napa County Environmental Resource Maps (Referred to on MND p. 3)
- Napa County Important Farmland Map 2002 prepared by the California Department of Conservation District, Division of Land Resource Protection. (Referred to on MND p. 7)
- Construction air quality analysis used to determine the Project's air quality and health risk impacts.

The courts have held that the failure to provide even a few pages of a CEQA documents for a portion of the CEQA review period invalidates the entire CEQA process, and that such a failure must be remedied by permitting additional public comment.<sup>8</sup> It is also well settled that an MND may not rely on hidden studies or documents that are not provided to the public.<sup>9</sup> By failing to make all documents referenced in the MND “readily available” during the current comment period, the County is violating the clear procedural mandates of CEQA, to the detriment of CURE and other members of the public who wish to meaningfully review and comment on the MND.

The County must extend the public comment and review period for the MND to allow for meaningful participation by the public and the detailed consideration of the Project's environmental impacts that CEQA requires.

#### **A. CPRA Violations**

The CPRA requires public records to be “open to inspection at all times during the office hours of the state or local agency” and provides that “every person has a right to inspect any public record.”<sup>10</sup> The CPRA forbids an agency to “delay or

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<sup>8</sup> *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

<sup>9</sup> *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 (“Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.”).

<sup>10</sup> Gov. Code § 7922.525.

obstruct the inspection or copying of public records”<sup>11</sup> and requires the agency to actively search for responsive records, even where “unusual circumstances” warrant an extension beyond the CPRA’s 10-day response period for copies of public records.<sup>12</sup>

CURE’s PRA Request was submitted on April 17, 2024. On April 29, 2024 (twelve days later), our office was informed that the County was working to collect the information requested by our PRA Request.<sup>13</sup> However, to date, no records have been produced (21 days after the PRA Request was submitted), and the County has failed to adhere to the timelines permitted under the CPRA to provide a response.<sup>14</sup>

We request that the County correct these violations and provide us with immediate access to the requested records, including providing access to records on a rolling basis, if necessary, in order to expedite the County’s response time.

Accordingly, we request that:

- 1) The County immediately provided CURE with access to all MND reference documents relied upon in the MND, including any construction air quality analysis used to determine the Project’s air quality and health risk impacts.
- 2) The County extend the public review and comment period on the MND for at least 30 days from the date on which the County releases these documents for public review.<sup>15</sup> If the missing documents are provided today, we request an extension to June 7, 2024.
- 3) The County postpone any hearings related to the Project, including the proposed May 15, 2024, Planning Commission hearing, until the entire set of reference documents relied on in the MND have been released for public review and comment in compliance with CEQA.

Given the short time before the current comment deadline, please contact me as soon as possible with your response to this request, but **no later than Thursday, May 9, 2024.**

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<sup>11</sup> Gov. Code § 7922.500.

<sup>12</sup> Gov. Code § 7922.535.

<sup>13</sup> See **Exhibit C.**

<sup>14</sup> Gov. Code § 7922.535.

<sup>15</sup> This Project has a 30-day public comment period, pursuant to 14 CCR § 15105(b).  
7180-005j

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Page 8

Please feel free to call or email with any questions: Tel: (650) 589-1660,  
Email: [kcarmichael@adamsbroadwell.com](mailto:kcarmichael@adamsbroadwell.com). Thank you for your prompt attention  
and response to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Carmichael". The signature is written in a cursive, flowing style.

Kevin Carmichael

KTC:ljl



# EXHIBIT A

# ADAMS BROADWELL JOSEPH & CARDOZO

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*Of Counsel*

MARC D. JOSEPH  
DANIEL L. CARDOZO

April 17, 2024

### Via Email and U.S. Mail

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### Via Email Only

Matt Ringel, Planner II, County of Napa  
[Matthew.ringel@countyofnapa.org](mailto:Matthew.ringel@countyofnapa.org)

**Re: Request for Immediate Access to Documents Referenced or Relied Upon in the Mitigated Negative Declaration (MND) (SCH 2024040604) for the Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR)**

Dear Mr. Bordona, Ms. Hoskins, and Mr. Ringel:

We are writing on behalf of **California Unions for Reliable Energy (“CURE”)** to request *immediate access to* a copy of any and all documents referenced or relied upon in the Mitigated Negative Declaration (“MND”) (SCH 2024040604) for the Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) Project (“Project”), proposed by Dynamo Solar LLC (“Applicant”).

The Project proposes construction of approximately 56-acres of floating solar panels on the Napa Sanitation District’s existing wastewater ponds. The solar facility will produce approximately 34.7 megawatts (MW) of direct current electricity, converted to 24.5 MW of alternating current electricity. The project

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Page 2

includes approximately 2-miles of electrical transmission lines, with portions constructed above and below ground. The electrical transmission route will consist of 51 transmission line towers ranging in height from 38.5 feet to 74.5 feet tall. The project will require the creation of one 0.13-acre electrical substation located on the northern end of the Sanitation District's exiting wastewater ponds and the 0.9-acre expansion of an existing PG&E "Tulucay" electrical substation located on Anderson Road.

The Project site is located unincorporated Napa County near the intersection of Soscol Ferry Road and Vista Point Drive and approximately one mile southwest of the State Highways 29 and 221 interchange. (APNs: 057-050-003-000, 057-010-010-000, 057-050-006-000, 057-010-038-000, 057-010-039-000, 046-400-016).

Our request for all documents referenced or relied upon in the DEIR is made pursuant to the California Environmental Quality Act (CEQA), which requires that all documents referenced, and incorporated by reference, in an environmental review document be made available to the public for the entire comment period.<sup>1</sup>

If the requested documents are in electronic format, please send them via a file hosting service such as Dropbox. If the electronic documents are 10 MB or less (or can be easily broken into chunks of 10 MB or less), please email them to [igrube@adamsbroadwell.com](mailto:igrube@adamsbroadwell.com) as attachments. Otherwise, please send the above requested items by U.S. Mail to our Sacramento Office as follows:

**U.S. Mail**

Jeanne K. Grube  
Adams Broadwell Joseph & Cardozo  
520 Capitol Mall, Suite 350  
Sacramento, CA 95814

**Email**

[igrube@adamsbroadwell.com](mailto:igrube@adamsbroadwell.com)

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<sup>1</sup> See Pub. Resources Code, § 21092, subd. (b)(1); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . "shall be readily accessible to the public"); *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007).

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Page 3

If you have any questions, please contact me at the email address above or leave me a message and (916) 444-6201 and I will return your call promptly. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Jeanne K. Grube". The signature is written in a cursive style with a light blue highlight behind it.

Jeanne K. Grube  
Paralegal

JKG:ljl

**EXHIBIT B**

ADAMS BROADWELL JOSEPH & CARDOZO

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*Of Counsel*

MARC D. JOSEPH  
DANIEL L. CARDOZO

April 17, 2024

**Via Email and U.S. Mail**

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**Via Email Only**

Matt Ringel, Planner II, County of Napa  
[Matthew.ringel@countyofnapa.org](mailto:Matthew.ringel@countyofnapa.org)

**Via Online Portal**

[https://countyofnapa.nextrequest.com/requests/new?dept\\_id=3906](https://countyofnapa.nextrequest.com/requests/new?dept_id=3906)

**Re: Public Records Act Request - Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR)**

Dear Mr. Bordona, Ms. Hoskins, and Mr. Ringel:

We are writing on behalf of **California Unions for Reliable Energy (“CURE”)** to request a copy of any and all public records referring or related to the Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) (“Project”) proposed by Dynamo Solar LLC (“Applicant”). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project.

The Project proposes construction of approximately 56-acres of floating solar panels on the Napa Sanitation District’s existing wastewater ponds. The solar

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April 17, 2024

Page 2

facility will produce approximately 34.7 megawatts (MW) of direct current electricity, converted to 24.5 MW of alternating current electricity. The project includes approximately 2-miles of electrical transmission lines, with portions constructed above and below ground. The electrical transmission route will consist of 51 transmission line towers ranging in height from 38.5 feet to 74.5 feet tall. The project will require the creation of one 0.13-acre electrical substation located on the northern end of the Sanitation District's exiting wastewater ponds and the 0.9-acre expansion of an existing PG&E "Tulucay" electrical substation located on Anderson Road.

The Project site is located unincorporated Napa County near the intersection of Soscol Ferry Road and Vista Point Drive and approximately one mile southwest of the State Highways 29 and 221 interchange. (APNs: 057-050-003-000, 057-010-010-000, 057-050-006-000, 057-010-038-000, 057-010-039-000, 046-400-016).

This request is made pursuant to the **California Public Records Act** (Government Code §§ 7920.000, *et seq.*). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request access to the above records in their original form, as maintained by the agency.<sup>1</sup> Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We will pay for any direct costs of duplication associated with filling this request up to \$200.<sup>2</sup> However, please contact me at (916) 444-6201 with a cost estimate before copying/scanning the materials.

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<sup>1</sup> Gov. Code § 7922.570; *Sierra Club v. Super. Ct.* (2013) 57 Cal. 4th 157, 161-62.

<sup>2</sup> Gov. Code §§ 7922.530, 7922.575; *North County Parents v. Dept. of Education* (1994) 23 Cal.App.4th 144; *County of Los Angeles v. Super. Ct.* (2000) 82 Cal.App.4th 819, 826.

April 17, 2024

Page 3

Please use the following contact information for all correspondence:

**U.S. Mail**

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If you have any questions, please call me at (916) 444-6201 or email me at [jgrube@adamsbroadwell.com](mailto:jgrube@adamsbroadwell.com). Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Jeanne K. Grube". The signature is written in a cursive style.

Jeanne K. Grube  
Paralegal

JKG:ljl



**EXHIBIT C**

ADAMS BROADWELL JOSEPH & CARDOZO

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May 7, 2024

**Via U.S. Mail**

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Sacramento, CA 94244-2460

**Via Online Portal**

[https://calfire.govqa.us/WEBAPP/rs/\(S\(3di4fq3yngxwpcrkeemc4ijtv\)\)/SupportHome.aspx?sSessionID=](https://calfire.govqa.us/WEBAPP/rs/(S(3di4fq3yngxwpcrkeemc4ijtv))/SupportHome.aspx?sSessionID=)

**Re: Public Records Act Request - Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR)**

Dear CALFIRE Public Records Coordinator:

We are writing on behalf of **California Unions for Reliable Energy (“CURE”)** to request a copy of any and all public records referring or related to the Dynamo Solar Commercial Floating Solar Use Permit Project (P22-00340-UP), Zone Change (P23-00181-ZC) and Variance (P23-00268-VAR) (“Project”) proposed by Dynamo Solar LLC (“Applicant”). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project.

The Project proposes construction of approximately 56-acres of floating solar panels on the Napa Sanitation District’s existing wastewater ponds. The solar facility will produce approximately 34.7 megawatts (MW) of direct current electricity, converted to 24.5 MW of alternating current electricity. The project includes approximately 2-miles of electrical transmission lines, with portions constructed above and below ground. The electrical transmission route will consist of 51 transmission line towers ranging in height from 38.5 feet to 74.5 feet tall. The project will require the creation of one 0.13-acre electrical substation located on the

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northern end of the Sanitation District's exiting wastewater ponds and the 0.9-acre expansion of an existing PG&E "Tulucay" electrical substation located on Anderson Road.

The Project site is located unincorporated Napa County near the intersection of Soscol Ferry Road and Vista Point Drive and approximately one mile southwest of the State Highways 29 and 221 interchange. (APNs: 057-050-003-000, 057-010-010-000, 057-050-006-000, 057-010-038-000, 057-010-039-000, 046-400-016).

This request is made pursuant to the **California Public Records Act** (Government Code §§ 7920.000, *et seq.*). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request access to the above records in their original form, as maintained by the agency.<sup>1</sup> Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We will pay for any direct costs of duplication associated with filling this request up to \$200.<sup>2</sup> However, please contact me at (916) 444-6201 with a cost estimate before copying/scanning the materials.

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<sup>1</sup> Gov. Code § 7922.570; *Sierra Club v. Super. Ct.* (2013) 57 Cal. 4th 157, 161-62.

<sup>2</sup> Gov. Code §§ 7922.530, 7922.575; *North County Parents v. Dept. of Education* (1994) 23 Cal.App.4th 144; *County of Los Angeles v. Super. Ct.* (2000) 82 Cal.App.4th 819, 826.

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Please use the following Please use the following contact information for all correspondence:

**U.S. Mail**

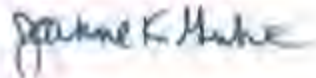
Jeanne K. Grube  
Adams Broadwell Joseph & Cardozo  
520 Capitol Mall, Suite 350  
Sacramento, CA 95814

**Email**

[jgrube@adamsbroadwell.com](mailto:jgrube@adamsbroadwell.com)

If you have any questions, please call me at (916) 444-6201 or email me at [jgrube@adamsbroadwell.com](mailto:jgrube@adamsbroadwell.com). Thank you for your assistance with this matter.

Sincerely,



Jeanne K. Grube  
Paralegal

JKG:ljl