

From: [George MacDonald](#)
To: [Trish Turner](#)
Subject: [EXTERNAL] RE: Update
Date: Wednesday, September 13, 2023 3:12:29 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)

Hello Ms. Turner,

I am continuing to review this matter with my clients. Since our call, we have also received additional documents and information and what appears to be a new site plan from the County that we had not previously seen. We are continuing to review the significance of these documents.

Best,
George MacDonald

George MacDonald
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way
Kelseyville, CA 95451
Tel: 707.277.9200
gmacdonald@katzoffriggs.com

CONFIDENTIAL AND PRIVILEGED: This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: [George MacDonald](#)
To: [Trish Turner](#)
Subject: [EXTERNAL] RE: Opposition to UP 21-17
Date: Wednesday, September 13, 2023 5:17:07 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[Grant Deed for 11635 Seigler Springs North.pdf](#)
[3472_001.pdf](#)

Dear Planner Turner,

My office represents The Divine Avataric Holy Domains of Adidam Ruchiradam, a California nonprofit religious organization recognized as a church (“Holy Domains”), regarding Major Use Permit 21-17 and the commercial cannabis project (the “Project”) proposed for 11615 and 11625 Seigler Springs North Road, Kelseyville, CA 95451. Among other properties in the direct vicinity of the Project, Holy Domains owns two properties adjoining the Project site that are located at 11635 Seigler Springs North Road (APN 115-007-07) (the “11635 Property”) and 11715 Seigler Springs North (APN 115-015-03) (the “11715 Property”). Holy Domains opposes the Project based on the following grounds, in addition to many other grounds that will be presented during the public comment period.

As discussed during our telephone call on September 6, 2023, the Project application and description provide that access to the Project site for construction, development, commercial cannabis cultivation, operation of the commercial cannabis enterprise, and the transport and distribution of finished cannabis product will be over the 11635 Property pursuant to authorization provided by the owner of that property. No easement is discussed in any of the materials. During our call, you told me that the applicant submitted a letter from an individual named “Prather” authorizing access over and use of the 11635 Property for the cannabis Project. In response, I told you that Holy Domains owns the 11635 Property and that the organization opposes the Project and objects to any use of, or access over, the 11635 Property for the Project. On September 11, 2023, your office provided a copy of a letter from Danny Prather as “owner of 11635 Seigler Springs North Road, parcel number 115-007-070” (the “Prather Letter”) dated May 25, 2021 relating to the Project application.

The applicant of the Project is not authorized or entitled to use the 11635 Property as access for the Project or for any other reason. Attached is the Grant Deed for the 11635 Property in the name of Holy Domains, as you requested. Danny Prather does not own the 11635 Property, is not a member of the Holy Domains organization, is not an agent for Holy Domains, and has absolutely no authority with respect to the 11635 Property. It is very concerning to my office and my client that the applicant submitted this apparently false authorization letter in connection with the Project application. Also concerning is that the applicant intends to build a road on the 11635 Property and use it as the access for the cannabis Project without any discussion with my client, who owns the property as part of their religious sanctuary.

We also note the purported “Grant of Easement” recorded October 29, 1993 referenced in your email below. However, contrary to the position of your email below, the Official Records for the County of Lake establish that the Grant of Easement does not provide “ingress and egress access easement rights” over the 11635 Property to the Project site.

Our understanding of the Official Record in this regard is as follows: The Grant of Easement was signed by James Phillip Gerace on October 22, 1993. On January 12, 1993, James Gerace conveyed his right, title and interest in the 11635 Property to Lucille O. Gerace by Document No. 93-000613 that was recorded that same day. Then on March 29, 1993, James Gerace again conveyed all right, title, or interest of his in the 11635 Property to Lucille O. Gerace by Document No. 93-006002, that was recorded on April 2, 1993. Then on February 4, 1994, Lucille O. Gerace conveyed her right, title and interest in the 11635 Property to James Phillip Gerace by Document No. 94-002388 that was recorded the same day. The Grant of Easement was signed by James Gerace on October 22, 1993, at a time when Lucille Gerace, not James Gerace, owned the 11635 Property. Therefore, the Grant of Easement is invalid and unenforceable against Holy Domains or any owner of the 11635 Property. Moreover, no easement or right of way, including the Grant of Easement, were described in any of the legal descriptions in the current vesting deeds for the involved properties. This is likely for good reason as the Grant of Easement is invalid and unenforceable and no other purported easement exists. The conclusion is that the Project site has no legal access and therefore cannot proceed.

As further mentioned in our September 6 call, the Project site is proposed for properties located within the cannabis exclusion area, which goes entirely unaddressed in the Project application materials that were provided to us by your office. The application of the cannabis exclusion area to the Project site must be thoroughly addressed and explained in writing by the applicant in the Project application materials, and by your office in review thereof. We understand that the applicant is planning to squeeze the growing of the cannabis into the extreme north-west corner of the Project site to avoid application of the exclusion area. This should not be permitted and it would be an arbitrary and irrational application of the rule. Art. 27 provides that “commercial cannabis cultivation is prohibited” in the exclusion areas. The term “cannabis cultivation area” is not defined or used in Art. 27 pertaining to the exclusion areas and their application, and therefore, that term has no application to this analysis. Art. 68 defines “cannabis cultivation” as “any activity involving the germinating, cloning, seed production, planting, growing, and harvesting of cannabis plants and the on-site drying, curing, grading, or trimming of cannabis plants.” The Art. 68 definition of cannabis cultivation appears to be intentionally broad and encompasses *any activities involving cannabis*. Is the Project applicant certifying that it will conduct absolutely no activities whatsoever involving cannabis on the remainder of the Project site, and how does the County intend to police compliance with the exclusion area for this Project? Allowing commercial cannabis cultivation to take place on parcels located within the commercial cannabis exclusion area contradicts the plain intention of the exclusion area ordinance and would also be impossible for the County to police. This simply cannot be permitted to occur and our position is that any such interpretation of the application of the exclusion area ordinance would be contrary to law.

The last point mentioned in our September 6 call concerns the water study and analysis provided by the applicant in the Project application. The water study and analysis is inadequate because, among other reasons, it fails to analyze or consider the multiple water wells located on the properties owned by Holy Domains that are used by their community for both potable water and other residential and religious uses. For example, no drawdown tests or any other analysis were performed on the wells used by the Holy Domains community. The water study also fails to consider or discuss the water usage needs of the Holy Domains community, which is a relatively large residential community directly adjacent to the Project site. One of the wells, and an important water sources, used by the Holy Domains community

is located on the real property identified by APN 115-015-02, which is a small parcel located south and downhill very close from the Project. The water study and hydrology report for the Project should analyze the impacts of the water usage and pollution by the Project on this particular well, in addition to the other wells used by Holy Domains.

It is concerning that the applicant has never reached out to Holy Domains about its water uses and needs or the applicant's proposal to build a road on the lands of Holy Domains (i.e., the 11635 Property) for the Project. The applicant should be a "good neighbor" and should have been candid, forthright, and communicative about its plans in regard to the Project and the 11635 Property. Based on the foregoing, and for additional reasons that may be presented in these proceedings, Holy Domains opposed UP 21-17.

Sincerely,
George MacDonald

Best,
George MacDonald

George MacDonald
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way
Kelseyville, CA 95451
Tel: 707.277.9200
gmacdonald@katzoffriggs.com

CONFIDENTIAL AND PRIVILEGED: This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: Trish Turner <Trish.Turner@lakecountycalifornia.gov>
Sent: Friday, September 8, 2023 3:54 PM
To: George MacDonald <gmacdonald@katzoffriggs.com>
Subject: RE: Follow Up

Thank You.

I would like to note that there is a recorded easement on 115-007-07 that was recorded October 29, 1993, that gives ingress and egress access easement rights to 115-007-03, 115-007-06, and 115-015-01.

Have a Great Weekend!!

Trish Turner
Assistant Planner II

I appreciate your help with this.

Sincerely,

Heather Critser
Office Manager

Katzoff and Riggs
9779 Broadmoor Way
Kelseyville, CA 95451
707-277-9200

CONFIDENTIAL AND PRIVILEGED

This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

KATZOFF & RIGGS LLP

ATTORNEYS AT LAW
9779 BROADMOOR WAY
KELSEYVILLE, CALIFORNIA 95451
www.katzoffriggs.com

Telephone (707) 277-9200
Direct Dial (707) 277-9203

Writer's E-Mail: gmacdonald@katzoffriggs.com

August 16, 2023

VIA EMAIL AND U.S. MAIL

Trish Turner – Assistant Planner II
Community Development Department
County of Lake
255 North Forbes Street
Lakeport, CA 95453
Tel: (707) 263-2221
Email: trish.turner@lakecountyca.gov

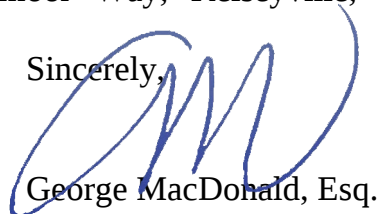
Re: REQUEST FOR NOTICE re Major Use Permit 21-17; IS 21-18; EA 21-17
Project: Seigler Springs North Cultivation Project, Major Use Permit 21-17,
Initial Study 21-18; Early Activation 21-17
Project Location: 11615 and 11625 Seigler Springs North Road, Kelseyville, CA
95451

Dear Planner Turner:

This letter constitutes a formal Request for Notice pursuant to Lake County Zoning Ordinance, 57.4 concerning the Seigler Springs North Cultivation Project, Major Use Permit 21-17, Initial Study 21-18; Early Activation 21-1754 (collectively, the “Project”). This office represents The Divine Avataric Holy Domains of Adidam Ruchiradam, a California nonprofit religious organization recognized as a church (“Holy Domains”) as interested persons concerning the Project. Please provide Holy Domains, in care of the undersigned, with any and all notices involving the Project, including notices of public comment periods, hearings, deliberations, or other action items on the Project.

Please provide all such notices relating to the Project to: Holy Domains, c/o George MacDonald, Katzoff & Riggs LLP, 9779 Broadmoor Way, Kelseyville, CA 95451 or by email to gmacdonald@katzoffriggs.com.

Sincerely,



George MacDonald, Esq.

GM:krl

Sent: Friday, July 28, 2023 12:40 PM

To: Trish Turner <Trish.Turner@lakecountycalifornia.gov>

Subject: [EXTERNAL] Request for Documents

Hi Trish,

I spoke to you on the phone regarding a project titled "Seigler Springs North, UP 21-17, IS 21-18" located at 11615 and 11625 Seigler Springs North Road, and am writing to request any documents that you may have regarding this project. They can be sent to this email address or, if it suits you better, I am happy to come pick them up in person. We are willing to pay for copies, should there be a fee. Please feel free to contact me here via email or call my office at 707 277 9200 should you need more information or have questions.

I appreciate your help with this.

Sincerely,

Heather Critser
Office Manager

Katzoff and Riggs
9779 Broadmoor Way
Kelseyville, CA 95451
707-277-9200

CONFIDENTIAL AND PRIVILEGED

This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: [George MacDonald](#)
To: [Trish Turner](#)
Cc: [Malgorzata Zuk](#)
Subject: [EXTERNAL] RE: Public Comment re Opposition to UP 21-17
Date: Wednesday, February 28, 2024 5:40:24 PM

Hello Planner Turner,

I am writing to touch base on our email below regarding UP 21-17. Will you please let us know times your office is available for an in-person meeting? As of now, next week is fairly open for me. We look forward to it.

Best,
George MacDonald

George MacDonald
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way
Kelseyville, CA 95451
Tel: 707.277.9200
gmacdonald@katzoffriggs.com
Eligible to Practice in California and Texas

CONFIDENTIAL AND PRIVILEGED: This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: George MacDonald
Sent: Monday, February 19, 2024 1:49 PM
To: Trish Turner <Trish.Turner@lakecountycalifornia.gov>
Cc: Malgorzata Zuk <mzuk@holydomains.org>
Subject: RE: Public Comment re Opposition to UP 21-17

Hello Planner Turner,

I am writing regarding the pending application for Use Permit 21- 17 for commercial cannabis cultivation on 11615 and 11625 Seigler Springs North Road, Kelseyville, CA on behalf of The Divine Avataric of Holy Domains of Adidam Ruchiradam ("Holy Domains"), a California nonprofit religious organization recognized as a church.

We would like to schedule an in-person meeting with your office to discuss the application of the Zoning Ord. Art. 27(at)(1)(v) entitled "Commercial Cannabis Cultivation Exclusion Areas", Subsection "h" which prohibits commercial cannabis cultivation within 1,000 feet of the following "areas or uses:" "A licensed child care facility or nursery school, church or youth-oriented facility catering to or providing services primarily intended for minors." We invite Lake County Counsel to attend the meeting as well.

As has been discussed in the UP 21-17 proceedings, lands owned by Holy Domains that are adjacent to the project site are part of the church and used as such by Holy Domains and its members, which include minors. We would like to understand how the Community Development Department interprets the cannabis cultivation area concerning lands owned and used as a church when applied to Holy Domains, and more generally, the lands of any church in Lake County. We would also like to understand the Community Development Department's reasoning(s) behind said interpretation(s).

Would you please let us know dates and times for the meeting at your offices? I am available to meet at the following times: February 21, 24 at any time, Feb. 22 before noon, February 23 before noon, or February 27 – March 1 at any time.

Best,
George MacDonald

George MacDonald
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way
Kelseyville, CA 95451
Tel: 707.277.9200
gmacdonald@katzoffriggs.com
Eligible to Practice in California and Texas

CONFIDENTIAL AND PRIVILEGED: This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: George MacDonald
Sent: Wednesday, October 25, 2023 10:10 AM
To: Trish Turner <Trish.Turner@lakecountyca.gov>
Subject: Public Comment re Opposition to UP 21-17

Planner Turner,

Attached is a public comment in opposition to UP 21-17. We request that the attached be provided to the Planning Commission in advance of the hearing set for October 26, 2023.

Best,
George MacDonald

George MacDonald
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way

Kelseyville, CA 95451
Tel: 707.277.9200
gmacdonald@katzoffriggs.com

CONFIDENTIAL AND PRIVILEGED: This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: [Malgorzata Zuk](#)
To: [Trish Turner](#)
Cc: wallym@adidam.org
Subject: Re: [EXTERNAL] UP 21-17
Date: Wednesday, February 14, 2024 9:09:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)

Good morning, Ms. Turner.

Thank you for a prompt response. The Notice provides for a period of "public review" ending on February 25. How is "public review" different from "public comment", and what types of actions the public could take in response to the application by February 25 that would be barred after that date?

Sincerely,
Gosia

On Fri, Feb 9, 2024 at 3:21 PM Trish Turner <Trish.Turner@lakecountycal.gov> wrote:

Good Afternoon,

Thank you for reaching out to the Community Development Department for the Seigler Springs North project. Please see my responses below in red.

1. Has the application been amended or changed since the last public hearing in October 2023? **No, there have been no changes made to the cannabis cultivation scope of the project, however the applicant did complete a tree study for the tree removal on the property.**
2. Has the hydrology report been updated since Annejanette Dodd submitted a revised report on May 19, 2023? **There has been no change in the scope of the project, so the hydrology study stands.**
3. Please email me the most recent notice sent out by the County regarding the public review period that began on January 26, 2024. **I sent out a new Notice of Intent and recirculated the Initial Study/ Mitigated Negative Declaration due to the tree removal and replacement. I also sent out a new AB52 notice to the surrounding tribes, to see if they will request a tribal consultation for the comments made at the Planning Commission.**

It was nice to meet you recently. I am following up on our conversation and writing to request additional information about the current status of the Application for Use Permit 21-17 and Initial Study 21-18:

1. Has the application been amended or changed since the last public hearing in October 2023?
2. Has the hydrology report been updated since Annejanette Dodd submitted a revised report on May 19, 2023?
3. Please email me the most recent notice sent out by the County regarding the public review period that began on January 26, 2024.

I look forward to hearing from you.

Sincerely,

Gosia

Małgorzata Żuk

General Counsel

Adidam Holy Domains

(707) 355-2020

From: [Malgorzata Zuk](#)
To: [Trish Turner](#)
Subject: Re: [EXTERNAL] UP 21-17
Date: Wednesday, February 14, 2024 9:50:06 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)

Thank you. Could you point me to a location (a link) where the comments can be posted?

Best regards,
Gosia

On Wed, Feb 14, 2024 at 9:12 AM Trish Turner <Trish.Turner@lakecountyca.gov> wrote:

It is the same thing. The public review period, is the public comment period. With that being said, we will always accept comments even after the public review period closes.



Trish Turner

Assistant Planner II

Department of Community Development

255 N. Forbes St.

Lakeport, CA 95453

Phone: (707) 263-2221 x 38112

Fax: (707) 263-2225

Email: trish.turner@lakecountyca.gov

STAY CONNECTED:



CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Malgorzata Zuk <mzuk@holydomains.org>
Sent: Wednesday, February 14, 2024 9:09 AM
To: Trish Turner <Trish.Turner@lakecountyca.gov>
Cc: wallym@adidam.org
Subject: Re: [EXTERNAL] UP 21-17

Good morning, Ms. Turner.

Thank you for a prompt response. The Notice provides for a period of "public review" ending on February 25. How is "public review" different from "public comment", and what types of actions the public could take in response to the application by February 25 that would be barred after that date?

Sincerely,

Gosia

On Fri, Feb 9, 2024 at 3:21 PM Trish Turner <Trish.Turner@lakecountyca.gov> wrote:

Good Afternoon,

Thank you for reaching out to the Community Development Department for the Seigler Springs North project. Please see my responses below in red.

1. Has the application been amended or changed since the last public hearing in October 2023? **No, there have been no changes made to the cannabis cultivation scope of the project, however the applicant did complete a tree study for the tree removal on the property.**
2. Has the hydrology report been updated since Annejanette Dodd submitted a revised report on May 19, 2023? **There has been no change in the scope of the project, so the hydrology study stands.**

3. Please email me the most recent notice sent out by the County regarding the public review period that began on January 26, 2024. I sent out a new Notice of Intent and recirculated the Initial Study/ Mitigated Negative Declaration due to the tree removal and replacement. I also sent out a new AB52 notice to the surrounding tribes, to see if they will request a tribal consultation for the comments made at the Planning Commission.

Sincerely,



Trish Turner

Assistant Planner II

Department of Community Development

255 N. Forbes St.

Lakeport, CA 95453

Phone: (707) 263-2221 x 38112

Fax: (707) 263-2225

Email: trish.turner@lakecountyca.gov

STAY CONNECTED:



CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Malgorzata Zuk <mzuk@holydomains.org>
Sent: Friday, February 9, 2024 3:12 PM
To: Trish Turner <Trish.Turner@lakecountyca.gov>
Cc: Wally Muszynski <wallym@adidam.org>
Subject: [EXTERNAL] UP 21-17

Planner Turner,

It was nice to meet you recently. I am following up on our conversation and writing to request additional information about the current status of the Application for Use Permit 21-17 and Initial Study 21-18:

1. Has the application been amended or changed since the last public hearing in October 2023?
2. Has the hydrology report been updated since Annejanette Dodd submitted a revised report on May 19, 2023?
3. Please email me the most recent notice sent out by the County regarding the public review period that began on January 26, 2024.

I look forward to hearing from you.

Sincerely,

Gosia

Małgorzata Żuk

General Counsel

Adidam Holy Domains

SEIGLER SPRINGS NORTH UP 21-17 eComments for 10/26/2023

Meeting: Planning Commission on 2023-10-26 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6a. 23-1168 Consideration of Proposed Major Use Permit (UP 21-17), and Mitigated Negative Declaration (IS 21-18), for Approval of Commercial Cannabis Cannabis Cultivation Consisting of 174,240 sf of Outdoor Canopy Located within 196,020 sf Cultivation Area; for Seigler Springs North/Brian Pensack; located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06)

Paul Edoa submitted a new eComment.

eComment: This project would disastrously erode the water table, bring harmful chemicals into the naturally beautiful landscape and be a greater burden on the energy costs of the county. No bueno.

Gosia Zuk submitted a new eComment.

eComment: I strongly oppose the proposed cannabis project because it will dangerously reduce the amount of water available for the community, create noise, air pollution, and unwanted light at night. It will attract noisy vehicle traffic into what is now a peaceful and quiet area. A cannabis operation of this size may attract crime and require armed guards, all of which would threaten people who happen to walk in the area. I say "no" to chemical contamination of water and soil, and ugly greenhouses on a hill overlooking the land that was recognized as sacred since ancient time.

Michael Goforth submitted a new eComment.

eComment: I have lived in Lake County for 27 years and visited often for the 12 years before that. My father, water skied here as a young man. I am a member of the Adidam Religious Community that has the Mountain of Attention Meditation Center that is next to the proposed Cannabis Grow. This is to industrial, an operation for this area. The developers of this property should find another location in Lake County, not in a residential area near a Meditation Retreat Center. Additional reasons to deny this use permit are: 1) Overuse of limited water; 2) Pollution of water that runs through the Meditation Retreat Center; 3) Noise, air and light pollution; 4) Traffic congestion; 5) Guards may intimidate and threaten people who stray near the plantings. Sincerely, Michael Miguel Goforth: Internet, Search, Social Media, Marketing Consultant & Tutor at Web GoForth ISSMMCT: Retired. Home Owner Kelseyville Riviera. 9570 Fairway Dr. Kelseyville Ca 95451 home 707-928-4796, Cell 7072921215.

Isabelle Trudeau submitted a new eComment.

eComment: As a resident of the area I oppose the granting of a use permit for this very large scale cannabis cultivation. My concerns are many: transformation of a calm and secure neighborhood into a busy commercial zone (with lots of road traffic, noise and light pollution), and the inevitable pollution of the watershed (including the nearby protected wetlands by the side of North Seigler road)

D. Hal submitted a new eComment.

eComment: The idea of putting a grow in this area, most likely because it is considered 'remote', is absurd and irresponsible. This area happens to not only have a concentration of long time residents and home owners, but frequent out-of-county visitors who come to specifically enjoy the serenity and peace of the area. Putting in a grow of this magnitude is irresponsible for the following reasons: 1) there is no well on the proposed property so the full environmental impact on the local water table is unknown, 2) the roads into this area are poorly maintained and narrow, while also having high foot traffic in some places, 3) the smell of a grow would destroy quality of life for the concentration of residents and visitors in the area, 4) the potential for criminal activity and resulting security measures would disrupt and darken the neighborhood.

Shasta McBride submitted a new eComment.

eComment: I oppose this project because of the severe use of water it will require in an already drought-stricken environment. I also oppose this project because the cannabis market is already oversaturated which creates very low pay for workers and owners, bad investments, and overuse of Lake County's resources. These are not good things to help a community flourish.

Indigo Perry submitted a new eComment.

eComment: The extreme use of water in such a fire-prone area is utterly irresponsible, not to mention the blight on the landscape. Property values will almost certainly be affected.

Alexandra Gandolf submitted a new eComment.

eComment: I strongly oppose the granting of this major use permit. The proposed cannabis operation would significantly alter the natural environment and disturb the serenity of the surrounding neighborhoods. It would severely deplete scarce water resources, cause air and water pollution, and increase traffic on a narrow country road. There is a spiritual sanctuary very close by that people come to from all over the world for peaceful retreat. Please do not allow this huge commercial operation to forever change this beautiful landscape and the lives of residents of the area.

Julie Payette submitted a new eComment.

eComment: We are in a high risk fire area. Most are even having trouble getting fire insurance. We should not deplete our water supply by a sizeable commercial undertaking such as this.

Steve Alexander submitted a new eComment.

eComment: I am a 30 year resident of the area and a homeowner a short distance from the proposed grow. Our neighborhood has faced some significant impact from commercial farming operations already including Snow's Lake Vineyard which destroyed thousands of acres of native countryside, increasing noise, traffic and introducing the use of pesticides very close to residential areas. There is also already a commercial cannibals operation a short distance away which as increased traffic and noise. One of my biggest concerns is also the effect on the water table which was already greatly impacted by the vineyards. I feel that will negatively impact our quality of life here. I have also heard that many commercial cannabis operations push the limits of what they are permitted to do and I am concerned that their are sufficient resources now to keep on top of this. Our area is still a healthy and happy place for people to live and I hope it remains so.

Francis Scott submitted a new eComment.

eComment: I'm very concerned about the severe environmental impact this large scale commercial/industrial operation will have on this area. Particularly the retreat Sanctuary property adjacent. Not to mention the impact and concern this will have on the existing wells that the Sanctuary retreat Property rely on. Are there not protective zoning laws that inhibit large commercial operations from encroaching into Sanctuary areas?

Sandra Hill submitted a new eComment.

eComment: Think a hundred skunks moving into the area and leaving their penetrating lasting stink, this is what it feels like to have a big grow like near, plus all the depletion of water, chemicals, reduced safety increased activity, lights and noise from fans at night. The smell penetrates into the house, you can not leave windows open to cool house and night so bills increase because you need to keep AC on, cant sit outside much of the growing and drying season. We are barely recovered from the fires, less water will endanger our own supply and fire safety. I was not able to rent my home due to stink. Property values will go down. Please have mercy. If you do not want a grow yourself near you, please do not force others to accept the same. Small grows happen all the time in this area, and I had a illegal grow next to me with 100 plants. I eventually moved. When a new grow started near my burned property later, I decided to sell the property and not built. Its that bad for many of us already.

tom shannon submitted a new eComment.

eComment: I am very concerned about water usage and water pollution. This operation will severely tax the aquafer. I live near by and rely on well water. We have already experienced lack of water,

many times due to the already existing marijuana operations in the area. There is also the matter of noise pollution, increased traffic, and a huge carbon footprint. Please do not allow this operation.
thank you

Michela Barcus submitted a new eComment.

eComment: I am opposed. This project will deplete resources on several levels, create increased fire risk, create noise to an area that for decades has been home to a Spiritual Retreat Sanctuary, bring industry into a rural and quiet residential area, negatively affect the water resources. It really is not appropriate use of this land.

Matthew Spence submitted a new eComment.

eComment: I oppose granting the Major Use Permit for Commercial Cannabis Cultivation on North Siegler Road in Middletown. The proposed cultivation area of 196,020 sf would constitute an industrial agricultural installation that is inconsistent with and would significantly change the ecology of the surrounding untouched rural landscape by: • Using vast quantities of water, thereby depleting aquifers • Causing 24/7 industrial noise pollution from drying fans • Causing industrial-level ecological pollution through the discharge of sediments, pesticides, fertilizers, and petroleum products into the watershed • Causing light pollution throughout the night • Significantly increasing auto and truck traffic on an unpaved rural road • Eroding the community's safety and trust by attracting criminal interest in the area.

Saleen Hinds submitted a new eComment.

eComment: Small farms, in contrast to large corporate farming, offer a more positive impact on the environment and communities. They use fewer pesticides and herbicides, preserving pollinators. Conservation practices like reduced tillage enhance soil health, reducing erosion. Shorter supply chains cut transportation emissions, and sustainable practices capture carbon. Small farms optimize resource use, while corporate farms overuse resources. Smaller farms are community-focused, creating jobs and supporting local economies. They distribute income equitably, reducing inequality. Small farms prioritize soil health, community, and sustainability. Supporting small farms is vital for a sustainable and equitable agricultural future. - Cyril Hinds, Lake County resident.

Charles Syrett submitted a new eComment.

eComment: I have been on meditation retreat at The Mountain Of Attention Sanctuary many times over the years, and I greatly value the peace and quiet of the area. This current proposal would be right on the periphery of the Sanctuary. It would utterly alter the landscape of the region and compromise water supply and many other environmental issues.

Rick Evans submitted a new eComment.

eComment: Cannabis operations like this are noisy and smelly. We already have a couple of them on the outskirts of our Seigler Springs neighborhood and it would impact us negatively in many ways to have an even larger one closer by. A major consideration is that the proposed grow would divert a huge amount of water in a dry area that needs to prioritize fire protection. For me personally the worst thing would be the disturbance created at the adjacent retreat Sanctuary which is used by many of us in the local community and others from around the world. We greatly value the peacefulness therein.

Rosamond Groves submitted a new eComment.

eComment: to whom it may concern, I'm concerned about several things regarding a proposed cannabis operation On North Seigler Springs Road -pesticides, fertilizers, petroleum products used for the operation and trash generated by the operation could make their way into the streams that feed the Sanctuary springs and local watershed• -depletion of water (cannabis operation of this size would use a vast quantity of water) -increased traffic ,the project description states that there will be several employees on site, among many other things Please respect the concerns of neighbors and reject this proposal Thank you, Rosamond Groves

William Stranger submitted a new eComment.

eComment: I live at 11475 Seigler Springs North Road just a few hundred yards away from the proposed outdoor cannabis grow. I am deeply opposed to the permitting of either an indoor or an outdoor cannabis grow on the property. It took me two years to return here after the Valley Fire of 2015. It has taken eight years since that fire for the deer population to be replenished. The proposed grow site is key habitat for those deer, who sleep there at night and come down to the lake on the Mountain Of Attention Sanctuary in the late afternoon and evening. Most importantly, the proposed grow immediately adjoins and overlooks that Sanctuary, which is a place of retreat for hundreds of Lake County and Northern California residents and a place of religious and spiritual pilgrimage for people from around the world. Besides drawing yet more water from our wells and creating unwanted activity, noise, and traffic, any grow would irrevocably compromise the privacy and repose of that Sanctuary.

Melani Jordan submitted a new eComment.

eComment: I am deeply opposed to this proposal of a commercial cannabis operation of this magnitude in the area. It is time that policy makers and community leaders take responsibility for the profound impacts of their decisions on the environment and human life locally and globally, given the compound effects we are seeing all over the world at this time. Commerce cannot rule and our choices, however small, have impacts for generations. Please heed all the opposition to this

operation on the grounds of water rights, pollution of all kinds, and preservation of the rural peace of Lake County. Thank you.

Harold Barcus submitted a new eComment.

eComment: The applicant property directly abuts a religious retreat center known as The Mountain of Attention Sanctuary. This facility is used for contemplative purposes only. Its caretakers spent decades preserving the pristine qualities of the grounds and surrounding environment. The proposed agricultural operation could seriously threaten continuation of religious practices as traditionally conducted on this uniquely maintained property. Of particular concern are noise, odors, chemical drift, degradation of water supplies, and general environmental alteration detrimental to the peaceful and serene nature of the sanctuary vicinity that has well supported religious activities there for many years. In order to support and maintain the unaltered continuation of sacred activities as traditionally practiced at the long-established religious retreat facility adjacent to the applicant property, I oppose granting of the use permit and urge denial of the application.

Rachel Key submitted a new eComment.

eComment: Hi, my name is Rachel Key (56 y.o) I live 5 minutes from the Mountain of Attention and work there several times a week. I am a member of a peaceful and quiet retreat Centre (the Mountain of Attention) which is owned by the Adidam non-profit community. This Retreat Centre sits right next to this potential grow. We run quiet retreats and value the peace and quiet and natural environment. A large grow would cause huge disturbance. Traffic on the shared road. Potential loud humming of lights, loud generator in the case of power outages. The "pong" of "skunk" throughout our Sacred Holy land. These are only the negative factors I can take a guess at. My fellow Adidam members will have more specifics to write. I ADAMANDLY OPPOSE this grow near our Retreat Centre. Thank you for the opportunity to protest.

Robert Shaffer submitted a new eComment.

eComment: I am a resident of the Seigler Springs area on Seigler Springs North Road, Many vineyards and cannabas operations have set up in this area in recent years. These are heavy water users. The aquifer we use, which has been reliable for many years, is reaching its limit and beginning to show signs of overuse. Rainfall in Northern California is becoming less reliable, as shown by the multi-year drought before last year. Expanded demands on this aquifer will have significant negative impacts on existing residents. The proposed project will also create additional traffic and noise, as well as pollution, in this quiet, secluded neighborhood. The Adidam facility has occupied this site for fifty years. For centuries humans have come to the natural hot springs here as a center for healing. To damage this resource in the name of short term extractive profits would be a tragedy and a travesty. Please do not approve the major cannabis operation at 11625 and 11625 Seigler Springs North Road.

Aspen Asperiny submitted a new eComment.

eComment: I oppose granting the Major Use Permit for Commercial Cannabis Cultivation on North Siegler Road in Middletown. The proposed cultivation area of 196,020 sf would constitute an industrial agricultural installation that is inconsistent with and would significantly change the ecology of the surrounding untouched rural landscape by: Patricia Royman Rosen on October 25, 2023 I oppose the above legislation. We live in Cobb Calif on Fox Drive • Using vast quantities of water, thereby depleting aquifers • Causing 24/7 industrial noise pollution from drying fans • Causing industrial-level ecological pollution through the discharge of sediments, pesticides, fertilizers, and petroleum products into the watershed • Causing light pollution throughout the night • Significantly increasing auto and truck traffic on an unpaved rural road • Eroding the community's safety and trust by attracting criminal interest in the area.

Laura DeBaun submitted a new eComment.

eComment: I vehemently oppose the proposed Cannabis Cultivation on 11615 and 11625 Seigler Spring North. There are multiple reasons why this is a disastrous proposal for our area. The monoculture leaches the land; the deep aquifers would suffer as they already are from other grows in our area. So for the sake of the land, water, air and other resources do not permit this mega cultivation to take root here!

Sally Schumacher submitted a new eComment.

eComment: I live on Ridge Road, which is very close to the proposed site as well as to the Mountain of Attention Sanctuary. I am strongly opposed to a large-scale commercial cannabis operation, which would have an extremely negative impact on the sanctuary and the surrounding neighborhood in terms of depleting our local water supply, causing significant ecological damage, as well as noise and light pollution. Please preserve the peace and quiet of our local environment and do not give permission to this project.

Chris Shanney submitted a new eComment.

eComment: This project represents a dramatic impact on the neighborhood as well as environmental risks. The applicant appears to be dramatically understating the impact on water tables, and dramatically understating the number of plants they will grow. I strictly oppose this effort. The benefit to the county is over ridden to the impact to many county residence in this area environmental concerns depletion of water table noise air pollution ecological destruction grading may cause discharge of sediments into the watershed pesticides, fertilizers, the streams that feed the Sanctuary springs and local watershed toxic chemicals light pollution (lights carbon footprint carbon foo(use of electricity, natural gas, water, fertilizers, greenhouse gas emissions) increased traffic esthetics of the natural surroundings

Jonathan Cottrell submitted a new eComment.

eComment: I have been a regular visitor to the unique sacred sanctuary known as Mountain of Attention since 1989. I am opposed to a proposed commercial cannabis cultivation on land adjacent to the sanctuary for many reasons, some are: ** Strong smell wafting onto the sanctuary. Hundreds of people regularly attend outdoor sacred events there. Strong odors will detract from sacred occasions ** Depletion of water resources. The main area of the sanctuary is 400 acres and requires a regular supply to maintain the plant environment. The proposed cannabis cultivation will disrupt this long-established water use. ** Many people visit the sanctuary from all over the world to enjoy its outstanding natural beauty. As a resident of Lake Co. and a naturalized US citizen originally from Britain. I came here because of the attraction of the Mountain of Attention Sanctuary. A commercial cannabis cultivation does not attract anyone except more traffic and potential criminal element.

Robert Rothemich submitted a new eComment.

eComment: I live on Shenandoah Road near this proposed cannabis farm, and am a member of the Adidam Community at the former Seigler Springs resort. I oppose the cannabis grow and the threat that it proposes to the environment due to extreme water use, increased traffic, industrial waste and pollution, and the risk of crime and criminal elements. Our retreat sanctuary at Seigler Springs is a pristine and peaceful place for meditation and religious practice and this operation is adjacent to the sanctuary property. Our church has been at this sanctuary for 50 years, and we have had to preserve the property in the past from geothermal development, a proposed airport, and expanding vineyards. We ask for Supervisors support to preserve this sacred place.

Wendy Weiss submitted a new eComment.

eComment: I strongly oppose the proposed Cannabis Cultivation on 11615 and 11625 Seigler Spring North. It is too close to residents and will forever alter and impact the residents and natural beauty, serene quiet, and safety that draws residents to this area. There will be a vast depletion of water for the area and residents. This extremely large grow will add air pollution. There will be ecological destruction from grading causing a discharge of sediments into the watershed. Pesticides, fertilizers, and petroleum products could make their way into the streams that feed the local area, animals, and are used by local residents. The increased traffic and need for security will greatly impact the area and change it forever. A grow of cannabis this large may attract a criminal element, forever eroding the community's sense of safety and trust. For all these reasons please do not approve the major cannabis operation at 11625 and 11625 Seigler Springs North Road.

Nancy Dent submitted a new eComment.

eComment: I live in this neighborhood and am completely opposed to more cannabis production in our area. The water levels are down already, and who knows what kind of chemicals are leaching into the wells. Also the prospect of light pollution with lots of night production or harvesting does not belong in a rural residential neighborhood. Lastly, I used to enjoy walks down the north Seigler

Springs Road, but when the last cannabis operation was started, there were guards with rifles and guard dogs inside their gates, and it felt very threatening in what used to be a friendly community! I seriously oppose this move. There must be another way for Lake County to invite new revenue into our county without selling out to more and more cannabis or vineyard development.

Thomas McBroom submitted a new eComment.

eComment: Excessive use of water. Borders a religious sanctuary!

Brenda Yeager submitted a new eComment.

eComment: As a resident of the Siegler Springs area, I oppose this development. Please do not allow a large-scale commercial enterprise to drain our neighborhood's natural resources & destroy our & our wildlife's quality of life for their own profit. We already face armed guards at the outdoor grow on Siegler Rd when we drive to visit our friends. Please do not invite even more 24-hour armed security into this quiet community. We have watched our friends squeezed out of their uninhabitable homes after vineyards ran their wells dry. The noise, smell, light pollution, constant activity, drain on our aquifer & loss of open land will significantly negatively impact our wildlife's delicate ecosystem after wildfire & mar the unique mountain landscape that residents here steward. This also borders Sacred land at the Mountain of Attention, where people gather for meditative retreat—please consider the impact such a grow would have next door to your own Church. I implore you to protect our neighborhood.

Mark Travis submitted a new eComment.

eComment: I live on North Seigler Springs Rd., near the proposed development, and I (as well as my neighbor) am strongly opposed this project, based on the following facts: 1. The developer has a history of flagrant violations of a previous Use Permit (Vista Farms) that resulted in a Stop Order for illegal grading, etc.. 2. Traffic - We already are impacted by a another very large cannabis operation within a mile of the newly proposed site, (who are already using vast amounts of water and) they have had a substantial impact on local traffic flow - including tractor-trailer and other large delivery trucks. The County does not properly maintain Seigler Springs North Rd. and the width of the road in several blind-curve sections does not comply with County or State standards. In the developer's application, they state the following: "project will include three employees during peak season". There would be at least 6-10 employees required during peak season, possibly many more.

Pamela Williamson submitted a new eComment.

eComment: I moved to Seigler Springs 28 years ago. I oppose this new cannabis project.

Jessica Haigh submitted a new eComment.

eComment: • depletion of water (cannabis operation of this size would use a vast quantity of water) • grading may cause discharge of sediments into the watershed • pesticides, fertilizers, petroleum products used for the operation and trash generated by the operation could make their way into the streams that feed the Sanctuary springs and local watershed • poisoning with toxic chemicals • light pollution (lights during the night could be seen from the neighboring parcels and the Sanctuary) • large cannabis grows have a huge carbon footprint (use of electricity, natural gas, water, fertilizers, greenhouse gas emissions) • increased traffic (the project description states that there will several employees on site, with around 11 – 23 daily car trips estimated to the property, including deliveries) • cannabis grows may attract criminal element, erode the community's sense of safety and trust • guards may intimidate and threaten people who stray near the plantings

Iris Harms submitted a new eComment.

eComment: I and a property owner in the area and strongly oppose the planned cannabis cultivation. The use of fertilizer, pesticides, other toxic chemicals and petroleum products pose a risk to the environment and watershed. I really oppose that growing drugs is the best use of our resources and landscape and it is certainly not for the benefit of the community who will loose the sense of safety and trust. Iris Harms

Frank Hayes submitted a new eComment.

eComment: I oppose the planned project for approval of commercial cannabis growing. Such a project will threaten the environment, watershed, and resources for the -good people of Lake County. I vote against and hope you will oppose this proposed project as well. Thanks, Frank Hayes

Charles Campbell submitted a new eComment.

eComment: I live close to the proposed cannabis cultivation site in Seigler Springs. I oppose the use permit for these reasons: 1) Its industrial size. 2) Its ecological footprint - these grows consume huge amounts of water and electricity 3) The noise of the huge fans used to dry the cannabis is horrendous. 4) There is a retreat center on that road, a place hundreds of people come to for meditation retreats - do we really want to subject them to the smell, noise, and other disturbances that large grows create? 5) The intensive use of fertilizers, pesticides and other chemicals - we've already seen what toxic runoff into Clear Lake has done to this precious resource. 6) It's a question of the direction we want the county to take - support large operations like this or take care of the natural beauty of the county, and head into the future (a future with many questions about climate, water, etc) with a smarter, big-picture approach? Sincerely, Charles F. Campbell 12200 Shenandoah Rd.

Jan Wennes submitted a new eComment.

eComment: To Whom it May Concern: Please do not allow this Permit at 11615 and 11625 Seigler Springs North Road, Kelseyville. I live near this property and am already disturbed by other cannabis cultivation that occurs in the area, such as the fans running late into the night. I moved to Lake County to be in the peace and quite of the countryside. I do not want to live in an industrial center. There will also be traffic impact on a road that is already quite dangerous with a blind corner and an additonal 90 turn on it. We also have seen the impact in this area of industrialization depleting our water supplies. Please do not let this permit. Thank you. Thank you.

eliot hurwitz submitted a new eComment.

eComment: I live about 1 mile from the proposed grow site. I first moved to this area in 1981 and retired back here in 2015, only to have my home burn in the Valley Fire. Since 2015 I have been active full time serving the local Cobb Mt. community's efforts to become a sustainable, resilient eco-adapted place, with special attention to the health of our creeks and our limited water resources. I do not oppose all cannabis but I strongly feel that this project is way out of scale and will have a negative cumiulative impact on the local creeks, already under tremendous stress. Climate changes underway will only make this worse. Seigler Creek is one of the creeks important for Clearlake Hitch spawning and any further degradation of its flow will have a negative impact. The project proposes pumping 86K gallons in April, which is key Hitch time. I also note that the project has not consulted with the proper tribal authorities for cultural assessment. All in all a very bad project for this area.

eliot hurwitz submitted a new eComment.

eComment: I live about 1 mile from the proposed grow site. I first moved to this area in 1981 and retired back here in 2015, only to have my home burn in the Valley Fire. Since 2015 I have been active full time serving the local Cobb Mt. community's efforts to become a sustainable, resilient eco-adapted place, with special attention to the health of our creeks and our limited water resources. I do not oppose all cannabis but I strongly feel that this project is way out of scale and will have a negative cumiulative impact on the local creeks, already under tremendous stress. Climate changes underway will only make this worse. Seigler Creek is one of the creeks important for Clearlake Hitch spawning and any further degradation of its flow will have a negative impact. The project proposes pumping 86K gallons in April, which is key Hitch time. I also note that the project has not consulted with the proper tribal authorities for cultural assessment. All in all a very bad project for this area.

Darcy Skarada submitted a new eComment.

eComment: I oppose permits at 11615 and 11625 Seigler Springs North Kelseyville. We live very near the proposed site. We have already been disturbed by grows not quite as near. Noise at times all day and night prevent enjoyment outside and preclude open windows during sleep. We have also already seen the degradation of the environment due to water usage and replacement of natural countryside with mono-crops. Despite the liabilities of rural living we chose to make our retirement home here due to our overriding desire for quiet and natural habitat. The industrial grow would impact

traffic on very vulnerable roads and deprive us of both our priorities in choosing our home location. Please do not allow these permits. Thank you.

Ronld Hudak submitted a new eComment.

eComment: I oppose this because cannabis is very deluding. And I really do want to see it being grown so close to home. May it be so!

Aimee Kartzman submitted a new eComment.

eComment: This area is already becoming threatened by additional traffic and vulnerable to commercial movements. It is a residential area and should be persevered and protected.

Elizabeth DeBrine submitted a new eComment.

eComment: Water usage would be significant and effect our well nearby. Rural area asthetics would be effected by air and light pollution, increased traffic and destruction of animal habitates (bear, mountain lions, deer, etc.) Attraction of criminal element Already have 2 other grow industries on Seigler Springs North Rd.

Daniel Apte submitted a new eComment.

eComment: I oppose the grow permits at 11615 and 11625 Seigler Springs due to all the problems such an operation is likely to cause such as water depletion, noise, air pollution, watershed damage, and chemical pollution in the ground,

Perry Strauss submitted a new eComment.

eComment: I oppose this project: Air Pollution Water usage Potential criminal activity Excess Traffic Strain on electric grid Pesticide contamination of land and air

Rita Siglain submitted a new eComment.

eComment: I feel that I have to speak up for the zoo that is right in the area proposed for this grow facillity. The zoo stretches for many acres. We have a herd of 15 camels, 10 horses, llamas, and goats. Called Fear-No-More Zoo, it was created in 1974 by Avatar Adi Da Samraj as a place to go to feel how we are all one. The animals at this zoo don't live in cages but live in a happy, free

environment. I have served there for many years and I know that depleting the water supply, polluting the air, increasing noise and so on will have a damaging effect on the health and happiness of these animals and on the possibility of sustaining this peaceful place into the future. The world is so terrifying right now for everyone. This zoo, along with the Sanctuary that supports it, is one of the few places on earth where human beings all over the earth can come to let go and feel the Spiritual nature of themselves and all of life. It's a place of Joy and Love. Please don't destroy this.

Emily Grinnell submitted a new eComment.

eComment: I am unable to be present this morning. I have lived around this greater neighborhood since 1975. The introduction of a large cannabis operation will forever mar the character of this beautiful and unspoiled area. It is the site of a meditation Sanctuary that has been there since 1974. Among my main concerns are: I have been informed that they may be misstating the number of plants they intend to grow, that on 88,000 sq ft, they will grow not 2,000, but 20,000 plants. There may be an added criminal element, and certainly the threatening presence of guards; Increased traffic on poor roads; Large grows could seriously deplete the water table, already affected by a local vineyard. Fans will create noise. Lights will create light pollution. The fumes of the cannabis product will carry across the area and possibly affect peoples' health; use of pesticides, fertilizers, and other toxic products will get into streams and the environment. I urge the denial of this use permit. Thank you!

Alfred Young submitted a new eComment.

eComment: I oppose granting the Major Use Permit for Commercial Cannabis Cultivation on 11615 and 11625 Seigler Spring North. I am resident in the area and a member of Adidam, and have enjoyed the peace and sanctity of the Sacred environment at The Mountain of Attention Sanctuary, which is located adjacent to this proposed Cannabis Grow-Op. The proposed Cannabis Grow-Op will have a profoundly negative impact on the local community, environment and residents: Large cannabis grows, in combination with the expansion of vineyards in Lake County, deplete water tables and have a large carbon footprint regarding greenhouse gas emissions. As well, fertilizers and chemicals leach into and contaminate groundwater and the natural springs in the Seigler Springs area. For the purpose of creating revenue, Lake County officials must approve permits for commercial cannabis grows in locations that are not adjacent to residential or sacred environments.

Betty Attardi submitted a new eComment.

eComment: I vehemently oppose the proposed Cannabis Cultivation on 11615 and 11625 Seigler Spring North. There are multiple reasons why this is a disastrous proposal for our area. The monoculture leaches the land; the deep aquifers would suffer as they already are from other grows in our area. So for the sake of the land, water, air and other resources do not permit this mega cultivation to take root here!

Timothy Toye submitted a new eComment.

eComment: The staff report assumes that the project is going to only grow 2000 cannabis plants at any one time. The hydrology report was based on this amount of growth on the property, and even then, appears to have significant omissions. Yet there is proposed to be 22 hoop houses totaling 88,000 sf. Based on my conversations with professionals in the cannabis industry this is just not remotely believable, and so the staff report is based on an erroneous assumption that the applicant will only grow 2000 plants at any one time. As far as monitoring, the applicant, who has a history of not following county regulations relative to the growing of cannabis, is supposed to submit an annual report, and the county may inspect the property once a year, though it also says they may not even do that. This is grossly inadequate to ensure that this project is not detrimental to the local residents.

David Rosen submitted a new eComment.

eComment: As a twenty year resident of Lake County and a homeowner I strongly oppose giving this cannabis business a permit to operate here. First is the fact that such a large growing operation of cannabis will take significant amount of water. Cannabis plants need a lot. This will significantly affect the water table for the residents in the area proposed. We have a few good years of water and then a lot of severe drought. Lake County residents first priority. I don't believe that the 174,240 sf will be not be accurate. If they get the permits, they will grow much more than that. Cannabis business also always attracts a criminal element... even legal businesses. Please, please make Lake County residents priority protect our circumstances first and do not allow such a business to create real difficulties for us.

Susan Hughes submitted a new eComment.

eComment: BAAAAAAAAAAAAAAAAAAAAAD FOR ENVIRONMENT AND WATER USE DON'T NEED MORE POT FARMS IN LAKE COUNTY KEEP LAKE COUNTY CLEAN AND FREE OF BIG POT BUSINESS.

Timothy Toye

I have been selling real estate in Lake County for the last 30 years and currently manage a brokerage here, as well as owning numerous properties in the county including in the general vicinity of the proposed project. During my time in real estate here, I have witnessed an exponential growth in vineyard acreage, very often replacing walnut and pear orchards, but also much acreage in new cultivation and then, more recently, growth in licensed cannabis farms. All of this growth in agriculture requires water for irrigation

and has had a significant toll on our water table, which has steadily reduced over that time with residential wells diminishing in their output or drying up, and formerly year-round creeks drying up or puddling. Anyone involved in testing wells will verify this.

It is the responsibility of the county planning staff and the planning commission to ensure that not only does new development conform to planning regulations, including CEQA, but also, and more importantly, that growth is managed in a responsible manner so that the ability of residents of Lake County continue to enjoy, as is their right, the benefits of living here. This will not happen if this project is approved.

I'm writing to you today out of concern regarding the hearing that would approve a permit for a very large commercial/industrial cannabis operation.

This large scale operation will certainly threaten what is otherwise a pristine area set aside as a significant Sanctuary Retreat area and Center. It will not only have a significant environmental impact via constant humming noise, constant lights, constant smell--all of which will threaten and disrupt this Sanctuary Retreat Area.

The other very major concern is the impact this will have on our water well systems. Please do not approve of this project.

Francis Scott

Minister Adidam Lake County

Dear Planning Commissioners,

I live on North Seigler Springs Rd., near the proposed development, and I (as well as my neighbor) am strongly opposed this project, based on the following facts:

1. Fact: The developer has a history of flagrant violations of a previous Use Permit in Burns Canyon (Vista Farms) that resulted in a Stop Order for illegal grading, failure to properly insure against environmental damage, and housing illegal workers in a non-residential building, amongst other things. Why should we expect anything different a second time around?

2. Fact: Traffic - We already are impacted by another very large cannabis operation within a mile of the newly proposed site, (who are already using vast amounts of water and) they have had a substantial impact on local traffic flow - including tractor-trailer and other large delivery trucks on a narrow, poor roads with one-lane sections in blind curves. The County does not properly maintain Sigler Springs North Rd. and the width of the road in several blind-curve sections does not

comply with County or State standards. Approval of this Project would make an already-dangerous situation even worse.

3. Fact: Traffic (2) – In the developer’s application, they state the following: “*As proposed the project will include three employees during peak season*”. This is an absurd statement that anyone familiar with cannabis grows is aware of; for a grow of this size there would likely be at least 6-10 employees required during peak season, possibly many more, just in order to harvest, trim, and dry the plants, etc.

4. Water – the only hydrology information comes from an obviously biased source, and there is no independent confirmation of facts, just as the last time this developer applied for the denied Use Permit for Vista Farms. I don’t see how this new, heavy ag use of water will not affect us as neighbors. The report furnished by the developer’s paid-consultant proposes taking over 2 million gallons a year out of the water table. And in her determinations of average rainfall she uses over 100 years of records that in no way reflects the new average rainfall due to current drought and climate change. This does not reflect reality.

5. The grow site is on a parcel that directly adjoins a church parcel. Is this permitted? I know there are setbacks for ‘personal-use’ cannabis grows and expect there would be such for a commercial operation similar to the personal grows, which are measured from the church parcel edge to the grow parcel edge, not the grow area within the grow parcel.

I urge the Commissioners to deny this Use Permit application.

Jeanne Martin submitted a new eComment.

eComment: I strongly oppose the approval of this proposed Cannabis project. A couple of years ago, my neighbor’s well (the Adidam Sanctuary), ran dry and they had to dig a much deeper well at great cost. This had never happened in over 40+ years. It was due to the deep unremitting drought the area has been suffering from - a drought that is only going to intensify as global warming intensifies. Another factor was the establishment of a large outdoor marijuana grow and a large vineyard down the road. Please do not approve this project further allowing businesses to draw down the water table at the expense of long term residents. This is in an area where many of us regularly walk for exercise. They will no doubt have guard shacks and guards now along that road which is totally intimidating. It’s just so destructive to the peace and serenity in this area.

jill sanna submitted a new eComment.

eComment: i oppose this consideration because there is another cannabis grow organization in my neighborhood and they race back and forth on the road and also there has been a lot more large delivery trucks and propane trucks and outhouse trucks driving back and forth and literally tearing up the road. There is just a small country road here and it is not made for these large 18 wheelers constant use. Also they seem to be using up a lot more of the underground water, even more than the

vineyards. Way out of proportion to all others living here. In addition, the other grow organization located near here has posted very unfriendly guards that are scaring the locals.

Valerie Ann Baldisserotto submitted a new eComment.

eComment: I lived in the area for the proposed grow operation during the 1980's, and then returned 7 years ago during my retirement for the peace and quiet it offers. Please do not allow this Permit at 11615 and 11625 Seigler Springs North Road, Kelseyville. I live near this property. The disturbance of previously placed grow operations in the neighborhood upon the environment and the water table is already remarkably negative. This very large operation will have major impact. on an already narrow and dangerous road. Other operations already add too much noise with fans running late into the night. Please do not let this permit. Thank you.

Paul Augspurger submitted a new eComment.

eComment: I'm extremely opposed. The operation would use lots of water, create noise, pollute the air, have a gigantic carbon footprint, create a disturbing increase in traffic, and may likely attract criminal element and increase vandalism. I live nearby and I say NO.

Blythe Massey submitted a new eComment.

eComment: I live in the Seigler Springs area just down the road from the proposed site for commercial cannabis cultivation. We are already being impacted by recent additional commercial grows to this area: more traffic on a quiet road (that many of us walk on daily), unfriendly security, and most importantly the impact to the watershed and well water. Please do not allow these chemicals and pesticides to tarnish this natural environment, and wildlife, which has been restoring since the 2015 Valley Fire. This peaceful residential area should not have more water depletion, noise pollution, light pollution, and security for commercial cannabis.

Via email to: trish.turner@lakecountyca.gov October 26, 2023 Ms. Trish Turner
Community Development Department County of Lake 255 North Forbes Street
Lakeport, CA 94543 Re: Response to Katzoff & Riggs October 25, 2023 Letter Seigler
Springs North Project (UP 21-17, IS 21-18) Dear Ms. Turner This firm represents
Seigler Springs Investments, LLC ("SSI"), the applicant for the above-references
Seigler Springs North Project ("Project"). We understand that the firm of Katzoff &
Riggs LLP ("Katzoff") submitted a letter dated October 25, 2023 objecting to the Project
on several grounds on behalf of the Divine Avataric Holy Domains of Adidam
Ruchiradam (hereafter, the "Adidam Holy Domains"). We received Katzoff's letter
yesterday afternoon. Katzoff asserts, among other things, that SSI's access easement
to the Project Site is invalid, and that SSI therefore lacks legal access to the Project

Site. Katzoff is mistaken; SSI's easement is valid under long-standing California law. We explain below.

Relevant Facts The Project is located at 11615 and 11625 Seigler Springs Road on property identified by Assessor Parcel Numbers ("APNs") 115-007-03, 115-007-06, and 115-015-01 (the "Project Site"). To access the Project Site SSI will utilize an existing ranch road ("Ranch Road") that passes through a parcel located at 11635 Seigler Springs Road and identified by APN 115-007-07 (the "Neighbor Property"). Adidam Holy Domains acquired the Neighbor Property in 2017. A recorded easement, dated October 22, 1993 and recorded October 29, 1993 (Lake County Recorder Doc. No. 93-022093) (the "Easement") authorizes the use of the Ranch Road across the Neighbor Property to access the Project Site. A copy of the Easement is attached as Exhibit 1. Katzoff's Claim Katzoff asserts that the Easement is "invalid and a legal nullity because it was not granted by a person who owned the [Neighbor Property] at the time the instrument was executed or recorded." (Katzoff Letter, p. 3.) Katzoff frames this argument as follows:

- The Easement was signed and granted by James Phillip Gerace on October 22, 1993.
- However, on January 12, 1993, James Phillip Gerace conveyed his interest in the Neighbor Property to Lucille O. Gerace. (See Exhibit 2.) This conveyance was re-recorded on April 2, 1993.¹ (See Exhibit 3.)

A minor correction is warranted here: Katzoff states that James Phillip Gerace "again conveyed all right, title or interest" in the Neighbor Property to Lucille O. Gerace on April 2, 1993. (Emphasis added.) The recorded document, however, states that "This Document Is Being Re-Recorded To Correct The Notarial Acknowledgment". (See Exhibit 3.) The April 2, 1993 recording is not a new conveyance. October 26, 2023 Response to Katzoff & Riggs LLP October 25, 2023 Letter 2

- Lastly, Lucille O. Gerace reconveyed the Neighbor Property to James Phillip Gerace on February 4, 1994. (See Exhibit 4.)

Based on these facts, Katzoff concludes that because James Phillip Gerace did not apparently hold title to the Neighbor Property on October 22, 1993, when he conveyed the Easement, the Easement conveyance was and is invalid. (See Katzoff Letter, pp. 3-4.)

Applicable Law Katzoff is correct that, in general, a person must either own or have the power to create an easement in the property the easement will burden. If this were the only applicable rule, then Katzoff would likely be correct that the Easement is invalid because it appears, at least from the recorded documents, that James Phillip Gerace did not own or have the power to create an easement in the Neighbor Property as of October 1993. However, Katzoff failed to consider the long-established legal doctrine of after-acquired title. The court in *Noronha v. Stewart* (1988) 199 Cal.App.3d 485 ("Noronha") explains the doctrine this way: The general rule is that if the grantor in a conveyance of real property has no title, a defective title, or an estate less than that which he assumed to grant, but subsequently he acquires the title or estate he purported to convey or perfects his title, the after-acquired or perfected title will inure to the grantee or his successors by way of estoppel, i.e., the grantor is estopped to deny that the after-acquired title passed by his conveyance. (Noronha at p. 489 [determining that this rule applied in the case of an easement].) In other words, if a person who does not own Property A grants an easement over Property A, the

easement is invalid. But, if that person later acquires Property A, the easement is revived and validated as if the person held title to Property A at the time the easement was granted. The Noronha decision (attached as Exhibit 5) is still one of the leading decisions on the doctrine of after-acquired title. Conclusion While James Phillip Gerace appears to not have held title to the Neighbor Property on the date that he conveyed the Easement, as Katzoff acknowledges in its letter, Mr. Gerace did subsequently acquire or perfect his title to the Neighbor Property. Consequently, the doctrine of after-acquired title applies here, and the Easement exists and is valid. Katzoff's claim regarding the Easement is wrong; established California law upholds the Easement's validity. Thank you for the opportunity to clarify this matter. Sincerely, Bradley B. Johnson, Esq. Everview Ltd.

Fiona Syme submitted a new eComment.

eComment: I am a resident of Lake County and I live very close to this proposed development and I vehemently oppose it. It will further strain our water resources, have a negative impact on the environment in terms of air and soil pollution, increase traffic and noise, use large amounts of electricity that will affect the night life habitat, and potentially bring a criminal element to this peaceful Count

Vicky McKie submitted a new eComment.

eComment: This will significantly increase water, air noise pollution. I believe this indoor operation will be way too large. It likely will have to be guarded against criminals therefore decreasing a sense of peace and security. The increase in traffic will be horrible

Damon Schoeffler submitted a new eComment.

eComment: I strongly oppose the development of any further cannabis cultivation operations in the Seigler Springs area. Please take into account the well considered opinions of the many long time residents of this county who recognize and cherish it for what it is; a peaceful place.

Gina Macioce submitted a new eComment.

eComment: The residents in this area already endure, every day, the environmental damage with Snow's Vineyard: pesticides, and the excessive use of water that we don't have the luxury to use. Please do not allow more, large "grow" operations into our neighborhood! I owned property across the street from Snow's Vineyard. A lot of the wildlife was driven out. We also endured the headlights of all their little tractors, spraying the pesticides in the middle of the night, with toxic residue wafting over to our homes. Please don't bring more air pollution into our neighborhood! At the Mountain Of Attention, there are some days where our water reservoir is empty. Please do not allow the excessive use of water to grow more cannabis! At the Mountain Of Attention, we host retreats for interested public and children. Please don't bring a security risk into our neighborhood, or the stench of cannabis. The Mountain Of Attention is on the historic register. Please help us preserve this sacred land.

Jordan Reyes submitted a new eComment.

eComment: Imposing a commercial cannabis cultivation on Seigler Springs Road in Kelseyville would be detrimental to the health of the surrounding environment. The area runs through shared areas of both Big Valley Rancheria and Middletown Rancheria and to which both have a Tribal Historic Preservation Officer that would need to be consulted with to understand why this area is important to both Tribes. Both Tribes are pushing for safekeeping of the environment to preserve Tribal heritage and knowledge. Increase use in water will have severe impacts on the process of revitalizing ecosystems in the area.

Annie Rogers submitted a new eComme

eComment: I hope I am not too late as I strongly oppose this proposition. We have so few places left in our county that are natural, quiet, beautiful, and without the intrusion of noise, chemicals, traffic and intense electrical activity. Please disregard this proposition and do not vote it in. We need sanctuary here in Lake County – all of us. We are so fortunate to live away from cities and city life. Let's not turn Lake County into that. Thank you.

Lewis Richardson submitted a new eComment.

eComment: I reside on land adjacent to the land covered in the major use permit. I strongly oppose granting the permit. My house uses well water, and the water source could be significantly or entirely depleted by large agricultural use of water via the common aquifer. Toxins from agricultural operations could also get into the aquifer (and be carried in the air to a wide area). Such a large commercial agricultural operations would have negative impact on the quality of life and health of the residents in the area and the overall ecology: much more traffic (much of it dirt road, and much of it commercial), noise, clearing and reshaping the land, removal of animal species, need to protect and guard the cannabis. This permit request does not benefit the residents nor the ecology of the area.

Lynnzee Elze submitted a new eComment.

eComment: Please please please do not allow this massive cannabis grow to happen in my neighborhood. The environmental impacts could easily be disastrous, affecting water supply and quality in this natural hot springs area, as well as bringing potential criminal elements, increased traffic, and undesirable air quality impacts.

Mimi Unanue submitted a new eComment.

eComment: I currently own 5 properties in this area and am very concerned about this cultivation proposal. The entire area needs to have a large multiyear water study done before any more cultivation projects are allowed especially ones that consume so much water. The wells in the area are already failing and the water had become increasingly contaminated. Before approval the effects that this and any future projects will have on its neighbors and surrounding area need to be examined. The potential of negative impact on the community needs to be addresses with scientific studies.

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:

7BC72FD89CDE4DF...

5/20/2026 | 9:09 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

DocuSigned by:
Robert Skalla
32307274C0BF431...

5/20/2026 | 7:51 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

Signed by:

Chris Johns

5/29/2026 | 7:42 AM PDT

AFEDA8AAABFD4BC...



Lake County, California

Support for Seigler Springs North UP 21-17

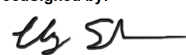
RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:

0898A04FBF884D7...

5/18/2026 | 5:34 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:

AD14FEF5E625477...

5/19/2026 | 11:41 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

DocuSigned by:

Christian
4B9B9D9AB9A54ED...

5/29/2026 | 8:21 AM EDT

I think that in addition to meeting all requirements for the state and county. It is important for the applicants that are approved to be experienced and knowledgeable on how to operate a cannabis business and I believe that Forest is one of those individuals with the grit to run a cannabis farm.



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

Signed by:

Edward Fussell

8FF512D1548444D...

5/17/2026 | 9:40 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

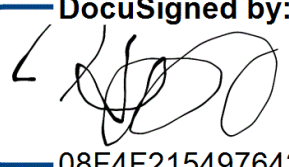
RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:

08F4F215497642A...

5/17/2026 | 10:47 PM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

DocuSigned by:

Kyle Truesdell
4E683A40F85940A...

5/17/2026 | 10:42 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

Signed by:

Mario Baroza

5/17/2026 | 12:06 PM PDT

B8B8A615E1FA4F3...



Lake County, California

Support for Seigler Springs North UP 21-17

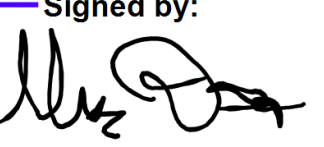
RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

Signed by:

A303705D0ADF44A...

5/19/2026 | 12:15 PM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

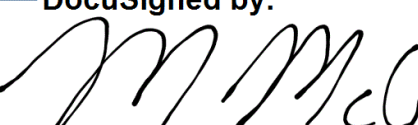
RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

DocuSigned by:

85770A12E2C34F7...

5/17/2026 | 11:27 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

Signed by:

Mike Burleson

3F65535D3CC94BA...

MB

5/18/2026 | 7:03 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:
Mike Yun
C0272F8D73DE411...

5/16/2026 | 9:26 PM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:

Sam Magruder

1450517E774343E...

5/16/2026 | 10:21 PM PDT

Samuel Magruder



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

DocuSigned by:

Sean Garland

9EB9252238354B8...

5/19/2026 | 12:16 PM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

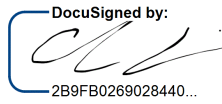
RE: Seigler Springs Holdings LLC - 11615 & 11625
Seigler Springs Rd, Kelseyville CA

To Lake County Planning Commission:

As someone with over 10 years in agriculture and the cannabis industry, I fully support the Seigler Springs North project and applicant, Forest Nikola Elie. I have worked closely with Forest and I can honestly say he is a hard working farmer, rancher, father, and a businessman who cares about the community.

Forest deserves the opportunity to operate a 3-acre canopy farm to continue building his future while bringing jobs, revenue, and responsible agricultural growth to Lake County for years to come.

Thank you for your consideration.

DocuSigned by:

2B9FB0269028440...

5/16/2026 | 3:33 PM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage. The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the community .

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

Will Peterson

Signed by:
Will Peterson
078C8919A4A641D...

5/17/2026 | 10:26 AM PDT



Lake County, California

Support for Seigler Springs North UP 21-17

RE: Seigler Springs Holdings LLC - 11615 & 11625 Seigler Springs Rd,
Kelseyville CA

To Lake County Planning Commission:

As a neighbor and resident of Lake County, I fully support the Seigler Springs North and applicant, Forest Nikola Elie. Forest is a good farmer, rancher, and neighbor who presents the kind of hardworking agricultural stewardship our county should encourage.

The property's private location, productive water source, flat usable ground, fresh mountain air, and abundant sunshine make it well suited for responsible agricultural use. This project has the potential to create jobs, support the local economy, and positively contribute to the

Forest Nikola Elie would be a great addition to the neighborhood, and I respectfully ask the Planning Commission to approval of the Use Permit # 21-17.

Thank you for your time and consideration.

DocuSigned by:

Yael Chetrit

D66F066D6B654CF...

5/19/2026 | 6:17 AM PDT



Lake County, California

Item 6b

New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.

Pi Stryker submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Dear Sirs, I would like to register my extremely strong opposition to the proposed Major Use Permit PL-26-115. This area does not in any way represent an acceptable option for this venture. The neighborhood in question is within close proximity to a meditation retreat center and is a residential area...an area chosen by those who live here for its natural beauty and serenity. To introduce a commercial facility of this magnitude is unacceptable. The cannabis industry uses vast amounts of water, devastates the land and brings an unwelcome quality of life into an area that should be protected and preserved. The increased traffic, taxation of resources, fire safety, and destruction of natural habitat brings additional stress on residential

neighborhoods all for the profit of a private company and should not be allowed. Period. Add to this the lack of adequate environmental review and the failure to address fire prevention and suppression all making this a proposal that should be rejected at all costs. Please protect the beauty of this special county and do not allow this to happen.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Wendy Weiss submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I strongly oppose this. It will cause traffic issues, including dust disturbance on the road. It will greatly deplete water resources. There is no adequate plan for fire prevention. This will have a significant negative impact on the surrounding neighborhoods and community.

[View and Analyze eComments](#)

New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.

Laura DeBaun submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public
participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17),
Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-
18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation
and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs
North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: This project will drain aquifers and create a lot of environmental damage and noise.

[View and Analyze eComments](#)

New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.

D. Hal submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I am a regular visitor to this area for over 35 years and a previous resident (and 58 years ago visited as a small child at summer camp). I come to the Siegler Canyon area to visit friends, and to be renewed in this pristine and quiet part of Northern CA. I noted in the proposal there is data regarding the noise impact. This assessment does not take into account that this is not in a flat open area, but in a hilly area with narrow valleys which creates amplifications and ambient 'drift' of noise. There is already a significant cannabis grow site just up the road. The water table is already threatened. How can another grow be allowed without impacting the long term residents in the area? While Lake County is often seen as remote and wild and therefore this sort of development would have a 'low impact', this is not the case in this particular part of Lake County. It is a long established and populated area, one could even say 'gentrified' area of Lake County. Please do not allow it to be spoiled!

[View and Analyze eComments](#)

**New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.**

Svorn Larsen submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-

18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Dear Chair and Planning Commissioners, I am a resident living a few miles from the proposed project site near Siegler Springs Road. I am writing to formally oppose *Use Permit PL-26-115, Seigler Springs N LLC / Forest Ellie, for the 80-acre property. After reviewing the documents submitted by the applicant, I have serious concerns that this project is not appropriate for this environmentally sensitive, fire-prone area. *1. Increased Truck Traffic, Dust, Noise & Road Impacts* Siegler Springs North Road and Loch Lomond Road are narrow, winding, 2-lane roads with no shoulders. The applicant's proposal will bring heavy commercial truck traffic, worker vehicles, and daily trips that will damage pavement, create hazardous dust, and increase noise. These roads are already unsafe for pedestrians, cyclists, and residents. More traffic also slows evacuation during wildfire events, putting everyone at greater risk. *2. Water Usage Impacts on Seigler Canyon Creek & Mountain Of Attention Sanctuary* Seigler Canyon Creek runs through the Mountain Of Attention Sanctuary and provides critical habitat and water for neighboring homes, wildlife, and retreat activities. The applicant fails to show that additional water use will not deplete this creek or the shared aquifer. In a drought year, taking more water from this system threatens both the sanctuary's ability to operate and residents' domestic wells downstream. *3. Effects on Retreats and Neighboring Homes* This area is home to spiritual retreat centers, quiet rural residences, and land held for cultural/ceremonial use by Miwok and Pomo communities. Industrial traffic, noise, lighting, and dust are incompatible with the purpose of these neighboring properties. The project will disrupt retreats, degrade quality of life, and damage the rural character that residents and visitors rely on. *4. Inadequacy of Environmental Review under CEQA* The applicant's submittals do not adequately address cumulative impacts. CEQA requires analysis of water, traffic, fire, biological resources, and cultural impacts together. The documents provided minimize water demand, ignore traffic impacts on evacuation routes, and fail to analyze effects on Seigler Canyon Creek. A full Environmental Impact Report is needed, not a mitigated negative declaration. *5. Failure to Address Fire Prevention & Suppression* This property sits in a "Very High Fire Hazard Severity Zone." The proposal adds infrastructure, electrical loads, and personnel without a credible fire prevention or suppression plan. With limited water available for firefighting and only one way in/out via Siegler Springs North Road, this project increases ignition risk and endangers the entire community. *6. Tree Removal During Mortality Crisis* The applicant proposes tree removal at a time when Lake County oaks and conifers are already dying from water stress, bark beetle, new Mediterranean oak bore beetle, and Sudden Oak Death syndrome. Removing more trees on steep slopes will increase erosion, reduce carbon storage, destroy wildlife habitat, and worsen watershed health when the forest is under maximum stress. For these reasons, I urge the Commission to deny Use Permit PL-26-115. Approving it would sacrifice water, fire safety, cultural resources, and environmental health for industrial expansion in a location that cannot support it.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Chris Shanney submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: One would have thought the concerns have were adequately addressed in 2025. This is a peaceful rural neiborhood, adjacent to a rural retreat center that has been operative for close to 50 years. A grow operation even of this size will create significant traffic, noise and dust. Concerns about the effects on the environment including impact on the (shared) water tables have not been addressed. while grow operation do offer new sources of revenue for the county, such revenue should not be prioritized over the already well established concerns on long term residents, sacred lands and the overall environment.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Julie Payette submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: This would have a negative impact on water availability and also change the quality of the neighborhood with trucks back and forth. In general I'm opposed to the expansion of the use of cannabis. I am a psychiatric nurse practitioner and I know it is not good for the brain in developing adolescents can cause a much higher incidence of psychosis and schizophrenia studies have been done on this in Europe.

**New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.**

Steven Elliott submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Dear Planning Commissioners and Staff, I am a resident living a few miles from the proposed Pasta Farms LLC expansion site near Siegler Springs Road, Lake County. I am writing to formally oppose Use Permit PL-25-71. This industrial-scale cannabis expansion is inappropriate for our area and threatens public safety, water security, and cultural resources. *1. Water Resources & Drought* The proposal adds 35 million gallons of water use annually. Lake County already faces seasonal well failures, dropping groundwater, and stream depletion in dry years. In a region prone to drought, drawing that volume from our shared aquifer risks drying up domestic wells and reducing water available for fire suppression. Water should not be prioritized for industrial agriculture over residents' basic needs. *2. Fire Safety in a High-Risk Zone* This site is in a "Very High Fire Hazard Severity" zone. Industrial grows run 24/7 lights, fans, and generators — all ignition sources. With limited evacuation routes off Siegler Springs Road, any fire would trap residents. More infrastructure, traffic, and electrical load only increase the chance of the next catastrophic wildfire. *3. Oak Woodland Removal* Removing 362 mature oak trees will permanently damage a fragile ecosystem. Oaks stabilize steep slopes, prevent erosion, store carbon, and support wildlife from deer to acorn woodpeckers. Once cut, that habitat and watershed function cannot be replaced. This violates the intent of oak woodland protection policies. *4. Rural Character, Noise & Pollution* We live here for quiet, dark skies, and clean air. An industrial operation brings nighttime lighting, generator/fan noise, diesel truck traffic, dust, and emissions on narrow rural roads. Odor and noise drift would disrupt residents and degrade the rural character that defines this area. *5. Traffic & Safety* Siegler Springs Road is a narrow, winding 2-lane road with no shoulders. Additional commercial truck traffic increases road damage, dust, and danger for families, pedestrians, and cyclists. In a fire evacuation, more vehicles on the road slow escape times for everyone. *6. Environmental Review & Neighborhood Compatibility* This expansion is proposed next to areas of significance to Miwok and Pomo tribal nations. An industrial cannabis operation with fencing, lighting, and heavy traffic is not compatible with a spiritual sanctuary on Native American sites. The Environmental Review must address cumulative impacts — water draw + oak loss + fire risk + traffic + noise + cultural disruption. Each alone is serious. Together they are unacceptable for an environmentally sensitive area. For these reasons, I urge the County to deny Use Permit PL-25-71. Approving this project would sacrifice water, safety, cultural respect, and rural quality of life for industrial expansion in a place that cannot support it. Sincerely, Concerned Resident Near Siegler Springs Road, Lake County, Ca

New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.

Pamela Williamson submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I first moved to his neighborhood 31+ years ago. I object to the amount of traffic, noise, and water usage that would accompany this commercial cannabis farm.

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Jennifer Tatum submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Increased truck traffic, dust, noise, and road impacts along both Seigler Springs North Road and Loch Lomond Road • Negative effects of water usage on Seigler Canyon Creek which runs through Mountain Of Attention Sanctuary • Negative effect on retreats and neighboring homes • Inadequacy of environmental review under CEQA • Failure to address fire prevention and suppression • Negative effect of tree removal at a time when tree mortality due to

water stress, bark beetle, new Mediterranean oak bore beetle, and Sudden Oak Death syndrome.

From: Jill Sanna <jill_sanna@adidam.org>

Dear Lake County Planning Commission, I would like to request that the major use permit PL-26-115 for cannabis cultivation for the properties located at 11615 and 11625 Seigler Springs Road North please be declined. These properties would be using the water that feeds Seigler Springs. Seigler Springs currently supplies water and habitats for many wild animals in the area, including deer, foxes, coyotes, owls, ravens, bats, ducks, salamanders, toads, lizards, snakes, eagles, otters, mice, racoons, opossums, badgers, skunks, squirrels, bears, bob cats, mountain lions, turkeys and many types of other birds such as quail, hawks and hummingbirds. Some of these are legally protected by law as you know. For instance, bats have ecological importance to help ensure the health of ecosystems where they play a crucial role in pest control and pollination. Also, the water from Seigler flows to Cache Creek which flows to the Sacramento River which waters crops in the Sacramento Valley which feeds millions of people. I question the reasoning for allowing THC to enter the water that will eventually be affecting that many men, women and children if indeed there is any water left after cultivation. I would also like to request that the proposed major expansion of Pasta Farms located at 10750 Seigler Springs Road North be denied. When Pasta Farms first started their operation our water table went dry that was feeding 12040 North Seigler Springs Road and we had to dig a well twice as deep as it was before they arrived. It is well documented that cannabis crops are very thirsty plants requiring 22 liters per plant per day drastically reducing water for ecosystems and communities. I speak for hundreds of local Lake County citizens who serve and protect the sacred land located at 12040 North Seigler Springs Road. I also speak for thousands of other people on a global scale who come to visit the Sanctuary yearly for spiritual upliftment. I am not sure how to write to the planning commission. Should I summarize or do you prefer in depth dialogue? Many people have spent much of their lives over 53 years cultivating the Sanctuary at 12040 N. Seigler Springs Road to create a safe and sane place to spend time. We are eternally committed to protecting and preserving the land and waters. We have our own volunteer fire brigade and fire water truck and fire Marshall. These men personally battled the Valley Fire to allow the County Fire Men to help other people. We have vowed to preserve the pristine heart and spirit of the land and waters in perpetuity so that all may enjoy the depth of beauty, stillness and radiance that

has been established in the area for many years of unified work and devotion. Let me know if you would like more letters from the community voicing support of this letter. I did not want to congest your email boxes. Thank you for considering this argument. The Sanctuary located at 12040 N. Seigler Springs Road is considered a neutral ground for all to find peace and purity. I ask for continued stewardship and support calling in a clear voice to protect community land and waters. Very Sincerely, Jill Sanna

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Betty Attardi submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I strongly oppose this. Next to Religious Sanctuary. There will be too much traffic. And water supply will greatly effected in the entire area.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for

public participation information and eComment submission on any agenda item.

Rick Brenner submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Hi, I strongly oppose this. There is far too much cannabis growth around Lake County, and this one will severely impact neighborhood noise, dust, and water. And will harm the retreat situation at the Mountain of Attention. Thanks, Rick

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Karen Booth submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I strongly oppose this development as the increased truck traffic, dust, noise, and road use will negatively impact along both Seigler Springs North Road and Loch Lomond Road. The effects of water usage on Seigler Canyon Creek which runs through the Mountain Of Attention Sanctuary and the effect on retreats there and neighboring homes will not be good! There has also been a gross inadequacy of environmental review under CEQA.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Timothy Toye submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: We do not have an infinite amount of water supply in Lake County, simply because it barely rains at all for half the year. We can only have so many straws sucking water out of the glass that is our groundwater supply. Already it is showing the signs of being beyond its limits. The headwaters of Cole Creek, about a mile from the proposed grow site, formerly a healthy year round stream, now puddles in the summer. I own a property that the creek runs through,

about 3 miles from the grow site. My well suddenly dried up after operating without issue for 50 years. I had to cover the cost of drilling a new well. There is scant mention of water usage by the applicant, yet any long term well maintenance professional will tell you the water table has been dropping locally, and other long term residents have found their wells compromised in quality and supply. The well directly next to the grow site dried up a few years ago and then fortunately recovered. The maps mention a spring at the headwaters of Seigler Creek on the actual grow site, that can no longer be identified, and this is beside one of the county's historic hot springs. All this is before approval of this and other projects in the area. If someone wants to suck water out of our existing aquifers in our county, show us conclusively that it is not going to deplete the supply for those already here. If they can't do that, which this applicant does not do, or even really attempts to do, then, until they can, the application must be denied.

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Chris Dickey submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I strongly oppose this - it is a unique spiritual sanctuary that I have been going to for over 30 years and will have a huge negative impact. Further the huge use of water will stress the local water supply and this is not sustainable for our future.

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Brenda Yeager submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Use Permit PL-26-115 Applicant: Seigler Springs N LLC/Forest Ellie My name is Brenda Marie Yeager and I have been serving Lake County as Poet Laureate for the past two years. I am also a resident of the Siegler Springs neighborhood and a spiritual practioner who frequents the Mountain of Attention Sancutary. I am writng to oppose this use permit. As poet laureate, I led workshops across Lake County in its natural environments and was always amazed to hear the beauty, maturity and human intelligence that is drawn out of the people of Lake County when they spend time in our natural environments. Please don't allow this massive commerical operation to disturb the peace and beauty of our neighborhood's pristine ecosystem. The traffic, noise, weapons, unknownable fire hazard impact, massive water usage and desimation of wildlife habitat is not conducive to cultivating what is truly important here: a refuge for wildlife, for our spiritual practice, and for the very highest potential of Lake County's residents—that of peaceful co-existence with each other and our natural world. The current large cannibis operation down the road has also led to loss of use of our common country roads and any sense of safety as armed guards now stand with visible weapons in a quiet rural neighborhood. This property abuts Sacred land used for meditation and for lives of spiritual contemplation by hundreds of peacefully minded practioners. Please help us to protect this Sacred treasure. I urge you to finally and definitively deny this permit. With gratitude, Brenda

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for

public participation information and eComment submission on any agenda item.

Jessica Haigh submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Dear Lake county servers, I am very concerned about the upcoming possibility of a large cannabis grow being established in this area. I feel it would be a detriment to the community in a number of ways. The most serious concern is their use of the water resources in this area. A large grow operation will consume large quantities of water and we completely depend on the supply of clean water here in the county. If clean fresh water is put in jeopardy it can potentially cause health problems as well as the ability to live here. This is no small matter and cannot be corrected once the problem has been created. There are concerns just for the general peacefulness of our community with the increase of traffic causing noise, dust and the influx of potentially threatening elements. I live at the Mountain Of Attention Sanctuary so all this is very obvious to me and I know how much it would impact our lives. I have heard that there would be a large removal of some of our native trees and given the current stresses on the environment this does not seem prudent. Please do not allow this to happen....I am strongly opposed to this. Thank you for your services to our county. Jessica Haigh

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Damon Schoeffler submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: As longtime resident of the area that this major use permit would affect I am compelled to voice my strong opposition. I urge those whose responsibility it is to act on behalf of the resident of this county to take my concerns, and those of my neighbors to heart. What is being proposed would lead to further degradation of the fragile ecosystem in this especially water scarce and arid part of California as well as disrupt the peaceful lifestyle that residents have sought and enjoyed here.

**New eComment for Planning Commission on
2026-06-11 9:00 AM - Please see agenda for
public participation information and eComment
submission on any agenda item.**

tom shannon submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I am particularly concerned about excessive water usage. Also the removal of many trees, along with traffic and road usage.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Elaine Dixon submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I live in the Seigler Springs Firewise community I strongly oppose this used permit. We are a peaceful Neighbourhood and a spiritual community who have been here for over 30 years. The kind of energy that something like this would bring to our Neighbourhood is unacceptable, not to mention the millions of gallons of water that they would take which are much needed for fire safety, and the sustainability of the area I have already been very disturbed by a loud humming noise at night, which apparently comes from a grow nearby. It is completely unacceptable and the kind of noise pollution that does not belong here. The trucks using N. Seigler road would be a great disturbance , not to mention that the road is not built for that kind of traffic. They have no business coming into this area, with this kind of industry They should find land somewhere else away from residential areas and peaceful religious sanctuaries Please do it permit beautiful Lake county to become a pot growing county with all the potential negative effects that go along with that

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Tim Holmes submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I like our quiet rural community. We don't need large scale operations here that use lots of water, cut down good trees, and create traffic and noise nuisance. Please reject this application.

[View and Analyze eComments](#)

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Rick Evans submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: Dear Planning Commissioners, I have lived in this area with my family for 40 years now and am very concerned about the idea of another large cannabis grow nearby, especially because it would be close to the Mountain Of Attention Sanctuary which I make use of regularly. This is a retreat sanctuary where people enjoy the tranquility of a clean and quiet environment and it would be extremely unfortunate to have an increase of commercial activity - trucks, dust, noise, etc. - in the vicinity. The water issue is huge as others have pointed out, and i fear for the health of the Seigler Canyon Creek which is a highlight of the Sanctuary. Please deny this permit, and thank you for your service to Lake County

From: Jill Sanna <jill_sanna@adidam.org>

Dear Lake County Planning Commission, I would like to request that the major use permit PL-26-115 for cannabis cultivation for the properties located at 11615 and 11625 Seigler Springs Road North please be declined. These properties would be using the water that feeds Seigler Springs. Seigler Springs currently supplies water and habitats for many wild animals in the area, including deer, foxes, coyotes, owls, ravens, bats, ducks, salamanders, toads, lizards, snakes, eagles, otters, mice, racoons, opossums, badgers, skunks, squirrels, bears, bob cats, mountain lions, turkeys and many types of other birds such as quail, hawks and hummingbirds. Some of these are legally protected by law as you know. For instance, bats have ecological importance to help ensure the health of ecosystems where they play a crucial role in pest control and pollination. Also, the water from Seigler flows to Cache Creek which flows to the Sacramento River which waters crops in the Sacramento Valley which feeds millions of people. I question the reasoning for allowing THC to enter the water that will eventually be affecting that many men, women and children if indeed there is any water left after cultivation. I would also like to request that the proposed major expansion of Pasta Farms located at 10750 Seigler Springs Road North be denied. When Pasta Farms first started their operation our water table went dry that was feeding 12040 North Seigler Springs Road and we had to dig a well twice as deep as it was before they arrived. It is well documented that cannabis crops are very thirsty plants requiring 22 liters per plant per day drastically reducing water for ecosystems and

communities. I speak for hundreds of local Lake County citizens who serve and protect the sacred land located at 12040 North Seigler Springs Road. I also speak for thousands of other people on a global scale who come to visit the Sanctuary yearly for spiritual upliftment. I am not sure how to write to the planning commission. Should I summarize or do you prefer in depth dialogue? Many people have spent much of their lives over 53 years cultivating the Sanctuary at 12040 N. Seigler Springs Road to create a safe and sane place to spend time. We are eternally committed to protecting and preserving the land and waters. We have our own volunteer fire brigade and fire water truck and fire Marshall. These men personally battled the Valley Fire to allow the County Fire Men to help other people. We have vowed to preserve the pristine heart and spirit of the land and waters in perpetuity so that all may enjoy the depth of beauty, stillness and radiance that has been established in the area for many years of unified work and devotion. Let me know if you would like more letters from the community voicing support of this letter. I did not want to congest your email boxes. Thank you for considering this argument. The Sanctuary located at 12040 N. Seigler Springs Road is considered a neutral ground for all to find peace and purity. I ask for continued stewardship and support calling in a clear voice to protect community land and waters. Very Sincerely, Jill Sanna

New eComment for Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Indigo Perry submitted a new eComment.

Meeting: Planning Commission on 2026-06-11 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b 26-06159:20 AM - Consideration of proposed Major Use Permit PL-26-115 (UP 21-17), Seigler Springs North LLC/ Forest Ellie, and Mitigated Negative Declaration PL-26-115 (IS 21-18), for the approval of no more than 130,680 square feet (sf) of commercial cannabis cultivation

and a Type 13 Distribution, self-transport license located at 11615 and 11625 Seigler Springs North Road, Kelseyville (APNs 115-007-03 and 115-007-06).

eComment: I'm concerned about water usage in an area that is prone to fire and drought.

KATZOFF & RIGGS LLP

ATTORNEYS AT LAW
9779 BROADMOOR WAY
KELSEYVILLE, CALIFORNIA 95451
www.katzoffriggs.com

Telephone (707) 277-9200
Direct Dial (510) 588-5171

Writer's E-Mail: riggs@katzoffriggs.com

June 10, 2026

VIA ELECTRONIC SUBMISSION

Lake County Planning Commission
c/o Community Development Department
County of Lake
255 North Forbes Street
Lakeport, CA 95453
Tel: (707) 263-2221
Email: trish.turner@lakecountyca.gov

Re: Supplemental Public Comment Concerning Proposed Approval of Major Use Permit PL-26-115; Reference UP 21-17 and IS 21-18
Applicant: Seigler Springs Holdings, LLC
Project Site: 11615 and 11625 Seigler Springs North Road, Kelseyville
Hearing Date: 9:20 a.m., June 11, 2026

Dear Planning Commissioners:

This comment is to supplement the prior Public Comments from this office in opposition to the Seigler Springs North Project (the "Project"), Use Permit 21-17 ("UP"), and Initial Study 21-18 ("IS"), all of which are incorporated in the current application for Major Use Permit PL-26-115 ("the MUP"). This office represents The Divine Avataric Holy Domains of Adidam Ruchiradam ("Holy Domains"), a California nonprofit religious organization recognized as a church, and is submitted in support of the position of Holy Domains in this matter.

This comment supplements the prior Public Comment from attorney George MacDonald of this firm, dated Sept. 13, 2023 (the "2/13/2023 Public Comment"), which is already part of the record for this matter. Additionally, reference is made to the Public Comment from Mr. MacDonald dated May 5, 2023 (the "5/5/2023 Public Comment"), attached as Exhibit A, which is fully incorporated by reference. The concerns documented by Mr. MacDonald in the 2/13/2023 Public Comment and the 5/5/2023 Public Comment have not been satisfactorily addressed, nor has there been any bona fide attempt at communication with Holy Domains by the Applicant about the Project. This is highly unusual given that the proposed access to the Project is across the lands of Holy Domains, and because the Project depends on water that is the major source of water for Holy Domains as well as the headwaters of Seigler Creek.

Holy Domains respectfully submits that substantial questions remain regarding legal access, groundwater availability, and potential impacts to neighboring properties and environmental resources. In particular,

the proposed access route to the Project Site crosses lands of Holy Domains, yet significant questions remain regarding the Applicant's legal right to use that route and there has been no adequate communication regarding operation of the driveway and gates on Holy Domains property. In addition, significant deficiencies remain in the groundwater analysis, creating uncertainty regarding potential impacts to Seigler Canyon Creek, neighboring groundwater resources, and water wells used by Holy Domains. These issues have not been adequately analyzed or resolved in the current record. Therefore, the Commission lacks sufficient evidence to support the findings for approval of the MUP, and the application should be denied or continued pending further analysis.

Discussion

A. The Project Lacks Proper Deeded Access.

The 5/5/2023 Public Comment by Mr. MacDonald documented the lack of a valid deeded easement for access to the proposed Project Site. The document attached to the Agenda, titled "Grant of Easement," is not a valid easement. Grantor James Phillip Gerace did not own the current Holy Domains property, 11635 Seigler Springs North Road (APN 115-007-070-000) (the "11635 Property"), at the time the easement was granted on October 22, 1993, and recorded on October 29, 1993. This defect in the chain of title which renders the instrument invalid was fully explained and documented in the 5/5/2023 Public Comment.

The Applicant has made reference to the case of *Noronha v. Stewart* (1988) 199 Cal.App.3d 485 to argue that the so-called doctrine of after-acquired title applies to validate the James Phillip Gerace grant of easement on the basis that Mr. Gerace later acquired title to the current Holy Domains lands after granting the easement. However, that case makes clear that Civil Code § 1106 does not apply to this situation, because a grant of fee title is not involved. *Noronha*, 199 Cal.App.3d at pp. 489-90, holds that the after-acquired title doctrine would validate a grant of easement by a non-owner who subsequently acquired title only if grounds for an estoppel are established. The Applicant has not established the elements of estoppel as applied to the history of the subject driveway.

B. The Applicant Cannot Meet the "Transportation" Conditions of Approval.

The Applicant has offered no explanation for how it can comply with the proposed "Transportation" conditions of approval, including, #3, "the project site(s) shall have access to a public road or recorded easement." As stated in the 5/5/2023 Public Comment, there is no such easement, as the only recorded easement is not valid. Additionally, the "letter from Prather" that was originally relied upon as establishing access is wholly inapplicable and irrelevant. Holy Domains, not Prather, owned the 11635 Property, at the time this letter was written.

Additionally, compliance with Transportation Conditions 3.c and 9, dealing with gates across access roads crossing other properties, is problematic. Holy Domains has a gate across the subject driveway. No mention is made of this gate anywhere in the MUP application. No communication or arrangement has

been made for regulating the opening and closure of this gate, and it is not addressed in the conditions of approval.

Moreover, the issue is not merely the existence of a gate. The proposed access route traverses lands owned by Holy Domains and is presently controlled by a gate maintained by Holy Domains. A photograph of this gate is attached as Exhibit B. The Staff Report and Conditions of Approval do not address how access will function in practice, including authority to operate the gate, distribution of keys or access codes, accommodation of employees, contractors, deliveries, and emergency vehicles, or resolution of future disputes. These operational issues further demonstrate that the record does not contain sufficient evidence to establish that access to the Project Site for purposes of the Project has been adequately analyzed or resolved.

Condition #5 requires “the first fifty (50) feet of driveway” off the nearest paved road, which is Seigler Springs North, to be improved with an all-weather surface. As discussed above, the Applicant does not have the legal right to comply with this condition. No communication or agreement between Applicant and Holy Domains has occurred about it.

Because the Applicant’s legal right to use and improve the subject access route remains disputed, substantial evidence does not support a finding that adequate access exists or that the Transportation Conditions of Approval can be satisfied as proposed.

C. There Are Very Serious Concerns About the Impacts of the Project on Water Supplies for Seigler Creek and for Wells on the Holy Domains Property

The Project well is located only approximately 200 feet away from a spring and within the Seigler Canyon Creek watershed, a tributary of Cache Creek within the Clear Lake watershed. Seigler Canyon Creek has historically provided habitat for the Clear Lake hitch, a state-listed threatened species. The relationship between groundwater pumping associated with the Project and nearby groundwater dependent resources has not been adequately analyzed. In support of its position in this matter, Holy Domains is submitting comments from a hydrogeologist, Gordon Thrupp, and Mr. Thrupp is expected to provide comments in the hearing. A few of Mr. Thrupp’s important expected comments include:

The sustainable yield of the well proposed as the sole water source for the project has not been adequately tested, estimated, or demonstrated. Yields of wells completed in fractured rock are (1) difficult to estimate, (2) require long-term testing for reasonable estimates, and (3) are notorious for decreases with time. Documented decreases in yields and failure of wells in the area, and the fact that the nearby spring (Seigler Spring), which is shown on USGS maps, no longer exists, supports that pumping from wells in vicinity of the proposed project have depleted groundwater resources in the fractured rock aquifer and is definitive evidence that the potential impacts of the proposed project to groundwater supply and riparian habitat are not less than significant. Adequate mitigation measures for potential depletion of water supply and environmental impacts

to native vegetation and riparian habitat have not been provided.

The estimated site recharge to groundwater reported on behalf of the Applicant is conjecture based on flawed technical analysis. The Well Completion Report absolutely does not demonstrate the sustainable yield of the project well. And the analysis certainly does not demonstrate that the “aquifer stays balanced;” long-term monitoring data are needed to determine that.

Neither the short-term yield, nor the long-term sustainable yield of the well proposed as the sole water source for the project has been adequately tested or demonstrated.

The project parcels are within Very High and Moderate Fire Severity Zones. Only one 5,000-gallon water tank is allocated for fire suppression.

These concerns are particularly significant because the Project relies upon a single well situated in fractured volcanic rock as its sole water source. The record does not contain sufficient long-term data to establish sustainable yield, evaluation cumulative groundwater impacts, or rule out potential effects on neighboring wells, groundwater dependent vegetation, or connected surface water resources. Under these circumstances, the evidence presently before the Commission is insufficient to support a conclusion that groundwater extraction-related impacts will be less than significant.

For the above reasons, the recommended conclusion of the Staff Report that potential impacts associated with this Project will be mitigated to “less than significant” through the implementation of the Mitigated Negative Declaration is premature and not justified at this time.

Conclusion

Thank you for your attention to this comment and consideration of the concerns of Holy Domains regarding the MUP and the Project. Please direct any question, communications, or other information concerning the subject matter of this letter to: Holy Domains, c/o Robert R. Riggs, Katzoff & Riggs LLP, 9779 Broadmoor Way, Kelseyville, CA 95451, or by email to rriggs@katzoffriggs.com.

Sincerely,

/s Robert R. Riggs

Robert R. Riggs

RRR:krl

attachments: Exhibit A -- 5/5/2023 Public Comment
Exhibit B – photo of entrance driveway and Holy Domains gate

EXHIBIT A

5/5/2023 Public
Comment

KATZOFF & RIGGS LLP

ATTORNEYS AT LAW
9779 BROADMOOR WAY
KELSEYVILLE, CALIFORNIA 95451
www.katzoffriggs.com

Telephone (707) 277-9200
Direct Dial (707) 277-9203

Writer's E-Mail: gmacdonald@katzoffriggs.com

October 25, 2023

VIA ELECTRONIC SUBMISSION

Lake County Planning Commission
c/o Community Development Department
County of Lake
255 North Forbes Street
Lakeport, CA 95453
Tel: (707) 263-2221
Email: trish.turner@lakecountyca.gov

Re: Opposition to Proposed Approval of UP 21-17 and IS 21-18
Project: Seigler Springs North, Use Permit 21-17, Initial Study 21-18
Project Location: 11615 and 11625 Seigler Springs North Road, Kelseyville

Dear Planning Commissioners:

This comment in opposition to the Seigler Springs North Project (the "Project"), Use Permit 21-17 ("UP"), and Initial Study 21-18 ("IS") is submitted on behalf of The Divine Avataric Holy Domains of Adidam Ruchiradam ("Holy Domains"), a California nonprofit religious organization recognized as a church. Holy Domains opposes the Project because, among other reasons, the Project Site lacks legal or adequate access and is located within the Commercial Cannabis Cultivation Exclusion Areas, the impact of the Project on potable water wells used by Holy Domains and its water needs were not analyzed, and the IS does not comply with CEQA because it is based on inaccurate and incomplete information.

Discussion

A. UP 21-17 Must Be Denied Because The Project Lacks Any Legal Or Adequate Access.

The proposed Project Site is located at 11615 and 11625 Seigler Springs North Road, Kelseyville, CA 95451 (the "Project Site"). Among other properties in the direct vicinity of the Project Site, Holy Domains owns two properties adjoining the Project Site that are located at 11635 Seigler Springs North Road (APN 115-007-07) (the "11635 Property") and 11715 Seigler Springs North (APN 115-015-03) (the "11715 Property") as part of its religious sanctuary. The Applicant proposes to access the Project Site over the 11635 Property, that is owned by Holy Domains. The Applicant is not authorized to use the 11635 Property as access for the Project and has no right or entitlement to do so.

1. The Description And Analysis Of Access To The Project Site Is Remarkably Deficient.

The Project Description, Property Management Plan, IS and Staff Report are remarkably vague, ambiguous and deficient in the discussion of the access to the Project Site. The Project Description dated April 13, 2021 submitted by the Applicant states “[t]here is a fairly non-descript dirt driveway on the left... This is the project driveway access that passes through the adjoining land not owned by the applicant located at 11635 Seigler Springs Road.” (Project Description Pg. 4.) To address the requirement that the Project Site have sufficient access, the Project Description provides “[t]he subject site is located on the west side of Highway 29 and it is accessed from two existing driveways.” (Project Description Pg. 9.) The Project Description proceeds to analyze the adequacy of Highway 29 as the access for the Project. The Project Site is not located on Highway 29 and Highway 29 is not used to access the Project. The Property Management Plan states “[e]xisting ranch roads will be used to access the cultivation compound.” (Property Management Plan Sec. 2.0.) Section 12.2 of the Property Management Plan then states that the “cultivation operation is accessed by a private gravel road.” Section 13.4.4 of the Property Management Plan then states that the “access road system” is “well designed” and the access roads “are typically armored with gravel or roadbase.” This is untrue. Per the Project Description, the proposed access over the 11635 Property is a “non-descript dirt driveway,” not a gravel or “armored” well-designed road. The proposed access is in fact an unimproved dirt path that is not adequate for a project of this nature. Holy Domains is informed that the proposed access has not been used for vehicle access or at all for twenty years or more. The proposed access has been abandoned and is in a state of disrepair.

The IS prepared by the Community Development Department (“CDD”) is similarly deficient. IS Section IX(f) states that “[a]ccess to the Project site is from Seigler Springs North Road, which is in compliance with California Public Resources Code §4290.” As discussed above, this is incorrect. The IS then states that emergency access will be provided via “Walnut Road and connecting roadways.” However, this purported access is not reflected anywhere in the Project application, site plans, or any of its supporting materials. Moreover, there does not appear to be a “Walnut Road” in the vicinity of the Project Site. IS Section XVII(a) entitled “Roadway Analysis” then provides that “[v]ehicles traveling to the site will use Seigler Springs North Road to access the driveway.” This “analysis” is again inaccurate and entirely insufficient for a project of this nature and size. The Project Site does not front Seigler Springs North or any county-maintained roads. The Major Use Permit Findings for Approval of the Staff Report at Item 3 purport to find that the “access” to the Project Site is “adequate” because there is allegedly a “private driveway, which is accessed from Seigler Springs North Road.” No further discussion or analysis of access is provided.

2. The Applicant Has No Right To Access The Project Site Via The 11635 Property.

Holy Domains first raised the issue of access for the Project with CDD in a telephone call on September 6, 2023. During that call, CDD told Holy Domains that the Applicant submitted a letter from an individual named “Prather” authorizing access over and use of the 11635 Property for the cannabis Project. In response, CDD was told that Holy Domains owns the 11635 Property, that the organization opposes the Project, and objects to any use of, or access over, the 11635 Property for the Project. Enclosed with this

letter is a true copy of a letter that purports to be from Danny Prather as “owner of 11635 Seigler Sprigs North Road, parcel number 115-007-070” (the “Prather Letter”) dated May 25, 2021 that CDD provided to Holy Domains. [Tab 1.] After learning that Mr. Prather does not own the 11635 Property, and therefore cannot authorize access over the property, the position changed in this regard. In an email dated September 8, 2023, CDD for the first time took the position that “there is a recorded easement (the “Alleged Easement”) on 115-007-07 that was recorded October 29, 1993, that gives ingress and egress access easement rights to 115-007-03, 115-007-06, and 115-015-01.” A copy of the Alleged Easement is included as Attachment 9 to the Staff Report.

It should be noted that the Alleged Easement is not discussed in the Project Application or any of its supporting materials. As far as Holy Domains is aware and informed, the Applicant has never itself asserted the Alleged Easement as an instrument granting it access rights over the 11635 Property. The Applicant has never contacted Holy Domains about the Project or discussed use of property owned by Holy Domains for the Project. According to CDD, the Applicant instead claimed that the Prather Letter authorized it to use the 11635 Property as access for the Project. Holy Domains addressed, among other issues with the Project, the Prather Letter and the Alleged Easement in an email to CDD dated September 13, 2023, a true copy of which is enclosed herewith and fully incorporated herein by reference. [Tab 2.] The September 13 email outlined that the Alleged Easement is invalid and a legal nullity because, similar to the Prather Letter, it was granted by an individual who did not own the 11635 Property. CDD did not respond to the September 13 email. However, in an email dated October 20, 2023, CDD stated “we do not have the authority to question its [the Alleged Easement’s] validity.” We disagree with that position. A primary role of CDD is to review the Application and its supporting material for accuracy, sufficiency, compliance with Art. 27, and truthfulness. Moreover, CDD has County Counsel and the County Surveyor at its disposal to aid in such a review, which should be done.

Holy Domains is the owner of the 11635 Property by virtue of the Grant Deed recorded on October 30, 2017 as Document No. 2017014447, a true copy of which is enclosed herewith. [Tab 3.] The legal description for the 11635 Property included in said Grant Deed makes no mention of the Alleged Easement or any other right of way over the 11635 Property in favor of the Project Site parcels. The Applicant acquired the 11615 and 11625 properties (i.e., the Project Site) by virtue of a Grant Deed recorded on October 20, 2020 as Document No. 2020013413, a true copy is enclosed herewith. [Tab 4.] The legal description for the 11615 and 11625 properties included in said Grant Deed also makes no mention of the Alleged Easement or any other right of way over the 11635 Property. The respective vesting deeds for the properties do not reference the Alleged Easement because, as outlined below, that instrument is invalid and a legal nullity. Supporting this conclusion is the fact that the Applicant submitted the Prather Letter in support of the Project, not the Alleged Easement. Thus, it appears that the Applicant is aware that the Alleged Easement is an invalid instrument.

The Alleged Easement is invalid and a legal nullity because it was not granted by a person who owned the 11635 Property at the time the instrument was executed or recorded. A review of the recorded title history for the 11635 Property establishes as follows: The Alleged Easement was signed by James Phillip Gerace on October 22, 1993. On January 12, 1993, James Phillip Gerace conveyed his right, title and

interest in the 11635 Property to Lucille O. Gerace by Document No. 93-000613 that was recorded that same day. Then on March 29, 1993, James Phillip Gerace again conveyed all right, title, or interest of his in the 11635 Property to Lucille O. Gerace by Document No. 93-006002, that was recorded on April 2, 1993. Then on February 4, 1994, which is after the date of the Alleged Easement, Lucille O. Gerace conveyed her right, title and interest in the 11635 Property to James Phillip Gerace by Document No. 94-002388 that was recorded the same day. True copies of the above referenced Deeds are enclosed herewith collectively as Tab 5. The Alleged Easement was signed by James Phillip Gerace on October 22, 1993, at a time when Lucille Gerace, not James Phillip Gerace, owned the 11635 Property. Therefore, the Alleged Easement is invalid and unenforceable against Holy Domains or any owner of the 11635 Property. This is why the Alleged Easement is not referenced in the vesting deeds or legal descriptions for the respective properties. Therefore, the Project Site has no legal access and UP 21-17 must be denied.

B. UP 21-17 Must Be Denied Because The Project Site Is Located In the Commercial Cannabis Cultivation Exclusion Area.

Lake County Zoning Ord. Art. 27(at)(1)(v) provides that “commercial cannabis cultivation is prohibited” in the Commercial Cannabis Cultivation Exclusion Areas (the “Exclusion Areas”). The Project Site and the proposed “Cannabis Production Area” are located within the Exclusion Areas subject to Art. 27. Enclosed as Tab 6 hereto are a series of maps that were included in the Applicant’s Property Management Plan depicting the boundaries of the “Cannabis Production Area.” Enclosed as Tab 7 hereto is a map that depicts the Exclusion Area on the Project Site. A comparison of these maps shows that the Cannabis Production Area encroaches into the Exclusion Area. Moreover, the only published policy of the County of Lake concerning the application of the Exclusion Area provides “If any Portion of a Parcel is Intersected by the Exclusion Zone the Entire Parcel is Excluded.” [See Tab 8.]

The Project Description, site maps, Property Management Plan, IS, Staff Report, and all other documents and/or information submitted in support of the Application are conspicuously silent on the fact that the Project is located within the Exclusion Area. Absolutely no discussion or analysis is provided as to why the above quoted published policy, and the application of the Exclusion Area to the Cannabis Production Area, is being completely ignored and disregarded for this Project. Moreover, any application of the Exclusion Area to permit commercial cannabis cultivation on parcels located within the Exclusion Area would be an unreasonable, arbitrary, and capricious application of the rule. Therefore, the interpretation and application of the Exclusion Area supported by CDD in this case is in excess of its administrative powers and unlawful.

The terms “cannabis cultivation area,” “cannabis cultivation site,” and “cannabis canopy” are not defined or used in Art. 27 pertaining to the application of the Exclusion Area, and therefore, those terms have no application to this analysis. Instead, Art. 27 broadly prohibits “cannabis cultivation” in any Exclusion Area. Art. 68 defines “cannabis cultivation” as “any activity involving the germinating, cloning, seed production, planting, growing, and harvesting of cannabis plants and the on-site drying, curing, grading, or trimming of cannabis plants.” The Art. 68 definition of cannabis cultivation is intentionally broad and encompasses *any activities* involving cannabis or its production. Allowing commercial cannabis

cultivation to take place on parcels located within the Exclusion Area contradicts the plain intention of the ordinance and would also be impossible to monitor or police. This slippery slope cannot be permitted to occur. The County of Lake and Code Enforcement do not have the resources or ability to police the boundaries of the Exclusion Areas within individual parcels being used for cannabis cultivation. CDD should also be required to take a formal position on the application of the Exclusion Area to the Project and explain why its published written policy set forth in this letter above should be disregarded. UP 21-17 must be denied because the Project Site is located within the Exclusion Area, the Cannabis Production Area defined by the Applicant encroaches into the Exclusion Area, and any application of the Exclusion Area to permit this Project on the Project Site would be an arbitrary, capricious, and unlawful application of the rule.

C. The Project Description is Inadequate Under CEQA.

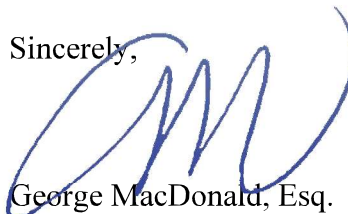
The purpose of an initial study is to determine whether a project may have a significant impact on the environment. (14 CCR § 15063.) The initial study must describe and analyze all phases of the project, implementation and operation. (14 CCR § 15063(a)(1).) A complete and accurate project description is a necessary first step in any evaluation of the potential environmental impacts of a project. (*City of Redlands v. County of San Bernadino* (2002) 96 Cal.App.4th 398,406.)

The Project Description forming the basis for IS 21-17 is inadequate under CEQA because, as discussed above, it is replete with inaccurate, incomplete, and inapplicable information. An accurate and complete project description is critical to any review of the Project. In sum, the Project Description provided by the Applicant cannot support the finding of an MND because it fails to accurately describe the project as a whole.

Conclusion

Thank you for your attention to this comment and consideration of the concerns of Holy Domains regarding the Project. Please direct any question, communications, or other information concerning the subject matter of this letter to: Holy Domains, c/o George MacDonald, Esq., Katzoff & Riggs LLP, 9779 Broadmoor Way, Kelseyville, CA 95451, or by email to gmacdonald@katzoffriggs.com.

Sincerely,

A handwritten signature in blue ink, appearing to be 'GM', is written over the typed name 'George MacDonald, Esq.'.

George MacDonald, Esq.

GM:krl

encls.

TAB 1

May 25, 2021

To Whom It May Concern,

I, Danny Prather, the owner of 11635 Seigler Springs North Road, parcel number 115-007-070, fully understand that my neighbors, Seigler Springs Investment, LLC, who share an easement, parcel numbers 115-007-030 and 115-007-060, are applying for their cannabis cultivation permits from Lake County and plan on cultivating cannabis on their property.

Thank you

A handwritten signature in black ink, appearing to read "Danny Prather". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

TAB 2

From: [George MacDonald](#)
To: [Trish Turner](#)
Subject: RE: Opposition to UP 21-17
Date: Wednesday, September 13, 2023 5:16:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[Grant Deed for 11635 Seigler Springs North.pdf](#)
[3472_001.pdf](#)

Dear Planner Turner,

My office represents The Divine Avataric Holy Domains of Adidam Ruchiradam, a California nonprofit religious organization recognized as a church ("Holy Domains"), regarding Major Use Permit 21-17 and the commercial cannabis project (the "Project") proposed for 11615 and 11625 Seigler Springs North Road, Kelseyville, CA 95451. Among other properties in the direct vicinity of the Project, Holy Domains owns two properties adjoining the Project site that are located at 11635 Seigler Springs North Road (APN 115-007-07) (the "11635 Property") and 11715 Seigler Springs North (APN 115-015-03) (the "11715 Property"). Holy Domains opposes the Project based on the following grounds, in addition to many other grounds that will be presented during the public comment period.

As discussed during our telephone call on September 6, 2023, the Project application and description provide that access to the Project site for construction, development, commercial cannabis cultivation, operation of the commercial cannabis enterprise, and the transport and distribution of finished cannabis product will be over the 11635 Property pursuant to authorization provided by the owner of that property. No easement is discussed in any of the materials. During our call, you told me that the applicant submitted a letter from an individual named "Prather" authorizing access over and use of the 11635 Property for the cannabis Project. In response, I told you that Holy Domains owns the 11635 Property and that the organization opposes the Project and objects to any use of, or access over, the 11635 Property for the Project. On September 11, 2023, your office provided a copy of a letter from Danny Prather as "owner of 11635 Seigler Springs North Road, parcel number 115-007-070" (the "Prather Letter") dated May 25, 2021 relating to the Project application.

The applicant of the Project is not authorized or entitled to use the 11635 Property as access for the Project or for any other reason. Attached is the Grant Deed for the 11635 Property in the name of Holy Domains, as you requested. Danny Prather does not own the 11635 Property, is not a member of the Holy Domains organization, is not an agent for Holy Domains, and has absolutely no authority with respect to the 11635 Property. It is very concerning to my office and my client that the applicant submitted this apparently false authorization letter in connection with the Project application. Also concerning is that the applicant intends to build a road on the 11635 Property and use it as the access for the cannabis Project without any discussion with my client, who owns the property as part of their religious sanctuary.

We also note the purported "Grant of Easement" recorded October 29, 1993 referenced in your email below. However, contrary to the position of your email below, the Official Records for the County of Lake establish that the Grant of Easement does not provide "ingress and egress access easement rights" over the 11635 Property to the Project site.

Our understanding of the Official Record in this regard is as follows: The Grant of Easement was signed by James Phillip Gerace on October 22, 1993. On January 12, 1993, James Gerace conveyed his right, title and interest in the 11635 Property to Lucille O. Gerace by Document No. 93-000613 that was recorded that same day. Then on March 29, 1993, James Gerace again conveyed all right, title, or interest of his in the 11635 Property to Lucille O. Gerace by Document No. 93-006002, that was recorded on April 2, 1993. Then on February 4, 1994, Lucille O. Gerace conveyed her right, title and interest in the 11635 Property to James Phillip Gerace by Document No. 94-002388 that was recorded the same day. The Grant of Easement was signed by James Gerace on October 22, 1993, at a time when Lucille Gerace, not James Gerace, owned the 11635 Property. Therefore, the Grant of Easement is invalid and unenforceable against Holy Domains or any owner of the 11635 Property. Moreover, no easement or right of way, including the Grant of Easement, were described in any of the legal descriptions in the current vesting deeds for the involved properties. This is likely for good reason as the Grant of Easement is invalid and unenforceable and no other purported easement exists. The conclusion is that the Project site has no legal access and therefore cannot proceed.

As further mentioned in our September 6 call, the Project site is proposed for properties located within the cannabis exclusion area, which goes entirely unaddressed in the Project application materials that were provided to us by your office. The application of the cannabis exclusion area to the Project site must be thoroughly addressed and explained in writing by the applicant in the Project application materials, and by your office in review thereof. We understand that the applicant is planning to squeeze the growing of the cannabis into the extreme north-west corner of the Project site to avoid application of the exclusion area. This should not be permitted and it would be an arbitrary and irrational application of the rule. Art. 27 provides that “commercial cannabis cultivation is prohibited” in the exclusion areas. The term “cannabis cultivation area” is not defined or used in Art. 27 pertaining to the exclusion areas and their application, and therefore, that term has no application to this analysis. Art. 68 defines “cannabis cultivation” as “any activity involving the germinating, cloning, seed production, planting, growing, and harvesting of cannabis plants and the on-site drying, curing, grading, or trimming of cannabis plants.” The Art. 68 definition of cannabis cultivation appears to be intentionally broad and encompasses *any activities involving cannabis*. Is the Project applicant certifying that it will conduct absolutely no activities whatsoever involving cannabis on the remainder of the Project site, and how does the County intend to police compliance with the exclusion area for this Project? Allowing commercial cannabis cultivation to take place on parcels located within the commercial cannabis exclusion area contradicts the plain intention of the exclusion area ordinance and would also be impossible for the County to police. This simply cannot be permitted to occur and our position is that any such interpretation of the application of the exclusion area ordinance would be contrary to law.

The last point mentioned in our September 6 call concerns the water study and analysis provided by the applicant in the Project application. The water study and analysis is inadequate because, among other reasons, it fails to analyze or consider the multiple water wells located on the properties owned by Holy Domains that are used by their community for both potable water and other residential and religious uses. For example, no drawdown tests or any other analysis were performed on the wells used by the Holy Domains community. The water study also fails to consider or discuss the water usage needs of the Holy Domains community, which is a relatively large residential community directly adjacent to the Project site. One of the wells, and an important water sources, used by the Holy Domains community

is located on the real property identified by APN 115-015-02, which is a small parcel located south and downhill very close from the Project. The water study and hydrology report for the Project should analyze the impacts of the water usage and pollution by the Project on this particular well, in addition to the other wells used by Holy Domains.

It is concerning that the applicant has never reached out to Holy Domains about its water uses and needs or the applicant's proposal to build a road on the lands of Holy Domains (i.e., the 11635 Property) for the Project. The applicant should be a "good neighbor" and should have been candid, forthright, and communicative about its plans in regard to the Project and the 11635 Property. Based on the foregoing, and for additional reasons that may be presented in these proceedings, Holy Domains opposed UP 21-17.

Sincerely,
George MacDonald

Best,
George MacDonald

George MacDonald
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way
Kelseyville, CA 95451
Tel: 707.277.9200
gmacdonald@katzoffriggs.com

CONFIDENTIAL AND PRIVILEGED: This transmittal is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: Trish Turner <Trish.Turner@lakecountycalifornia.gov>
Sent: Friday, September 8, 2023 3:54 PM
To: George MacDonald <gmacdonald@katzoffriggs.com>
Subject: RE: Follow Up

Thank You.

I would like to note that there is a recorded easement on 115-007-07 that was recorded October 29, 1993, that gives ingress and egress access easement rights to 115-007-03, 115-007-06, and 115-015-01.

Have a Great Weekend!!

Trish Turner
Assistant Planner II

TAB 3



RECORDING REQUESTED BY:
Fidelity National Title Company

Doc # 2017014447
Page 1 of 3
Date: 10/30/2017 09:10A
Filed by: FIDELITY NATIONAL TITLE
Filed & Recorded in Official Records
of COUNTY OF LAKE
RICHARD A. FORD
COUNTY RECORDER
Fee: \$213.60

When Recorded Mail Document
and Tax Statement To:
The Divine Avataric Holy Domains of Adidam
Ruchiradam, a California corporation
11635 Seigler Springs North Road
Middletown, CA 95461

Escrow Order No.: FSNX-3111700262

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Property Address: 11635 Seigler Springs North
Road,
Middletown, CA 95461
APN/Parcel ID(s): 115-007-070-000

GRANT DEED



The undersigned grantor(s) declare(s)

- ☐ This transfer is exempt from the documentary transfer tax.
☒ The documentary transfer tax is \$193.60 and is computed on:
☒ the full value of the interest or property conveyed.
☐ the full value less the liens or encumbrances remaining thereon at the time of sale.
The property is located in ☒ an Unincorporated area.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, Raymond Augustus Lynch and Katharine Bennett Lynch, Trustees of the Raymond Augustus Lynch and Katharine Bennett Lynch Living Trust

hereby GRANT(S) to The Divine Avataric Holy Domains of Adidam Ruchiradam, a California corporation

the following described real property in the Unincorporated Area of the County of Lake, State of California:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

Dated: October 19, 2017

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below.

the Raymond Augustus Lynch and Katharine Bennett Lynch Living Trust

BY:

Raymond Augustus Lynch, Trustee
Raymond Augustus Lynch, Trustee

BY:

Katharine Bennett Lynch, Trustee
Katharine Bennett Lynch, Trustee

MAIL TAX STATEMENTS AS DIRECTED ABOVE

GRANT DEED
(continued)

APN/Parcel ID(s): 115-007-070-000

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Lake

On 10-23-17 before me, Sharon Salvador, Notary Public,
(here insert name and title of the officer)

personally appeared Raymond Augustus Lynch and Katharine Bennett Lynch,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the
within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies)
and that by his/her/their signature(s) on the instrument the person(s) or the entity upon behalf of which the person(s)
acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and
correct.

WITNESS my hand and official seal.

Sharon Salvador
Signature

(Seal)



EXHIBIT "A"
Legal Description

For APN/Parcel ID(s): 115-007-070-000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE UNINCORPORATED AREA, COUNTY OF LAKE, STATE OF CALIFORNIA AND IS DESCRIBED AS FOLLOWS:

All that portion of the Southeast quarter of Section 13, Township 12 North, Range 8 West, M.D.M., lying Westerly of that certain road commonly known as Seigler Springs North Road.

TAB 4

11111 11111 11111 11111 11111

Doc # 2020013413

Page 1 of 2

Date: 10/20/2020 03:05P

Filed by: FIRST AMERICAN TITLE
Filed & Recorded in Official Records
of COUNTY OF LAKE
RICHARD A. FORD
COUNTY RECORDER
Fee: \$649.50

RECORDING REQUESTED BY:

First American Title Company

MAIL TAX STATEMENT

AND WHEN RECORDED MAIL DOCUMENT TO:

Siegler Springs Investments LLC
637 Lindaro Street, Suite 201
San Rafael, CA 94901

Space Above This Line for Recorder's Use Only

A.P.N.: 115-007-030-000 AND 115-007-060-000

File No.: 1701-6362433 (KH)

GRANT DEED



The Undersigned Grantor(s) Declare(s): DOCUMENTARY TRANSFER TAX \$632.50; CITY TRANSFER TAX \$;
SURVEY MONUMENT FEE \$

[☒] computed on the consideration or full value of property conveyed, OR
[] computed on the consideration or full value less value of liens and/or encumbrances remaining at time of sale,
[☒] unincorporated area; [] City of **Kelseyville**, and

EXEMPT FROM BUILDING HOMES AND JOBS ACTS FEE PER GOVERNMENT CODE 27388.1(a)(2)

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, **WILLIAM F. HAYES, SUCCESSOR TRUSTEE OF THE HAYES FAMILY LIVING TRUST INITIALLY CREATED MAY 11, 1994**

hereby GRANTS to **Seigler Springs Investments LLC, a Delaware limited liability company**

the following described property in the City of **Kelseyville**, County of **Lake**, State of **California**:

THE SOUTH ONE-HALF OF THE SOUTHWEST QUARTER OF SECTION 13, ALL IN TOWNSHIP 12 N. RANGE 8 WEST M.D.M., AS EVIDENCED BY A CERTIFICATE OF COMPLIANCE, RECORDED JULY 10, 1991, DOCUMENT NO. 91-013856, OFFICIAL RECORDS OF LAKE COUNTY, AND AS AMENDED CERTIFICATE OF COMPLIANCE, RECORDED JULY 31, 1991, DOCUMENT NO. 91-015419, OFFICIAL RECORDS OF LAKE COUNTY.

EXCEPTING THEREFROM ONE-HALF OF THE HEAT, FLUIDS AND MINERALS, IN AND ON THE HEREIN DESCRIBED PROPERTY, INCLUDING, BUT NOT BY WAY OF LIMITATION, FORMATION WATER, THE NATURAL HEAT OF THE EARTH, ALL FLUIDS AND MINERALS PRODUCIBLE THEREFROM, GASES AND VAPORS, LIQUIDS AND SOLIDS, STEAM, HOT WATER, CARBON DIOXIDE, AMMONIA, HELIUM, OIL GAS AND OTHER HYDROCARBONS, BOTH IN A GASEOUS AND LIQUID STATE, HEAVY WATER, SULPHUR GASES, SULPHUR COMPOUNDS, BORON COMPOUNDS, HALOGENS AND THEIR COMPOUNDS, CARBONATE AND BICARBONATE COMPOUNDS, ALL IONIC SOLUTIONS AND ENTRAINED SOLIDS, HEAT AND THERMAL ENERGY DERIVED FROM ANY SUCH HEAT, FLUIDS AND MINERALS, AS RESERVED IN DEED FROM DONALD L. WILSON AND LORA N. WILSON, HIS WIFE, JAMES N. ROBERTS AND MARIE L. ROBERTS, HIS WIFE, AND V. WILLIAM KNOSHER AND MAXINE N. KNOSHER, HIS WIFE TO JACK J. GROSS AND MELVINA GROSS, HIS WIFE, AS JOINT TENANTS, RECORDED NOVEMBER 24, 1964, IN BOOK 446 OF OFFICIAL RECORDS, AT PAGE 78, LAKE COUNTY RECORDS.

Mail Tax Statements To: **SAME AS ABOVE**

Date: **10/14/2020**

A.P.N.: 115-007-030-000 AND 115-007-060-000

File No.: 1701-6362433 (KH)

Dated: October 14, 2020

WILLIAM F. HAYES, SUCCESSOR TRUSTEE OF
THE HAYES FAMILY LIVING TRUST INITIALLY
CREATED MAY 11, 1994

William F. Hayes
William F. Hayes, Successor Trustee

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF Oregon)SS

COUNTY OF Benton)

On October 14, 2020 before me, Nisla V. Keudell, Notary Public, personally appeared William F. Hayes

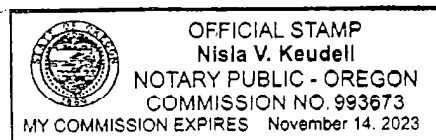
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

This area for official notarial seal.

Nisla V. Keudell
Notary Signature



TAB 5

RECORDING REQUESTED BY

AND WHEN RECORDED MAIL TO

Name
Street
Address
City &
State
Lucille O. Gerace
10671 Harbor Rd.
Kelseyville, CA. 95451

DOCUMENT NUMBER
93-000613

R	4
M	1
ST	1
GC	2
LN	
CO	✓

RECORDED AT REQUEST

Shanton
93 JAN 12 AM 10:35
LAKE COUNTY RECORDER
GENE R. HOKE
COUNTY RECORDER

AP#115-007-07
SPACE ABOVE THIS LINE FOR RECORDER'S USE

Quitclaim Deed

This Indenture made the 1/12/93 day of
one thousand nine hundred and

Between James Phillip Gerace the party of the first part,
and Lucille O. Gerace, a widow the party of the second part,

Witnesseth: That the said party of the first part, in consideration of the sum
of dollars,
lawful money of the United States of America, to in hand paid by the
party of the second part, the receipt whereof is hereby acknowledged, does hereby
release and forever QUITCLAIM unto the party of the second part, and to heirs
and assigns, all their certain lot, piece, or parcel of land situate in
the UNINCORPORATED AREA County of L.A. Co.
State of CALIFORNIA, and bounded and described as follows, to-wit:

All that portion of the Southeast quarter of
Section 13, Township 12 North, Range 8 West, M.D.M.,
lying westerly of that certain Road commonly
known as Seigler Springs North.
(Unimproved property, containing of 29 acres, more
or less)

Together with the tenements, hereditaments, and appurtenances thereunto belonging
or appertaining, and the reversion and reversions, remainder and remainders, rents, issues,
and profits thereof.

To have and to hold the said premises, together with the appurtenances, unto
the party of the second part, and to heirs and assigns forever.

In Witness Whereof the party of the first part has executed this
conveyance the day and year first above written.

Signed and Delivered in the Presence of

James Phillip Gerace

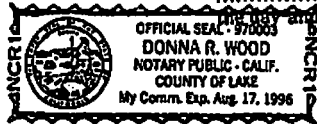
This document is only a general form which may be proper for use in simple transactions and does not constitute an offer, as a substitute for the advice of an attorney. The printer does not make any warranty, either express or implied, as to the legal validity of any provision in the printing of these forms in any specific transaction.

State of California,

County of LAKE ss.

On this 12th day of January,
in the year one thousand nine hundred and 93, before me,
Donna R. Wood, a Notary Public,
State of California, duly commissioned and sworn, personally appeared
James Phillip Bernae
known to me to be the person described in and whose name is subscribed to the within instrument, and
acknowledged to me that he executed the same.

IN WITNESS WHEREOF I have hereunto set my hand and affixed my official seal in the
County of LAKE



Donna R. Wood
Notary Public, State of California
My commission expires 8-17-96

Dated....., 19.....

Quitclaim Deed

END OF DOC. 2

RECORDING REQUESTED BY
LAKE COUNTY TITLE COMPANY

RETURN TO
LUCILLE GERACE
10671 HARBOR RD.
KELSEYVILLE, CA 95451

Order/Escrow No.: 137850
XL C M

DOCUMENT NUMBER
93-006002

R	3
M	1
ST	
GC	1
LN	
CO	EX

RECORDED AT REQUEST
LAKE COUNTY TITLE CO.
93 APR -7 AM 8:00
LAKE COUNTY RECORDER
GENE R. HOKE
COUNTY RECORDER
ca

The undersigned grantor(s) declare(s):
Documentary transfer tax is \$0.00
() Computed on full value of property conveyed, or
() Computed on full value less value of liens and encumbrances remaining at time of sale

Signature of declarant or agent determining tax - firm name

QUIT CLAIM DEED

JAMES PHILLIP GERACE

do(es) quit claim unto LUCILLE O. GERACE, a widow

all real property situate in the unincorporated area of the County of LAKE
State of California, described as follows:

All that portion of the Southeast quarter of Section 13, Township 12 North, Range 8 West,
M.D.M., lying Westerly of that certain road commonly known as Seigler Springs North.

AP #115-007-007.

THIS DOCUMENT IS BEING RE-RECORDED TO CORRECT THE NOTORIAL ACKNOWLEDGEMENT

Date: March 29, 1993

James Phillip Gerace

JAMES PHILLIP GERACE

STATE OF CALIFORNIA)

) S.S.

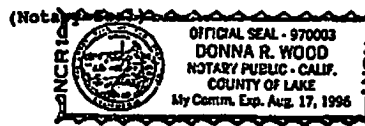
County of Lake)

On March 29, 1993, before me, the undersigned, a Notary Public in and for said County
and State, personally appeared JAMES PHILLIP GERACE

personally known to me (or proved to me on the basis of satisfactory evidence) to be the
person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me
that he/she/they executed the same in his/her/their authorized capacity(ies), and that by
his/her/their signature(s) on the instrument the person(s) or the entity upon behalf of
which the person(s) acted, executed the instrument.

Donna R. Wood

Notary Public
FORM 82C-4



END OF DOC. 1

AND WHEN RECORDED MAIL TO

Name James Phillip Gerace
Street Address 11635 Seigler Spr. No. Rd
City & State Middletown, Ca. 95461
AP# 115-007-07

DOCUMENT NUMBER

94-002388

R	4
N	3
ST	1
GC	2
LN	
CO	✓

RECORDED AT REQUEST

Grantor

54 FEB -4 PM 2:27

LAKE COUNTY RECORDER
GENE R. HOKE
COUNTY RECORDER

cc

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Deed

I, (WE), Lucille G. Gerace

hereby Grant(s) to James Phillip Gerace

All that Real Property situated in the UNINCORPORATED AREA

County of LAKE, State of CALIFORNIA

bounded and described as follows: All That portion of the Southeast
Quarter of section 13, township 12 North, Range
8 West, M.D.M., lying Westwely of that Road
commonly known as Seigler Springs North
(Unimproved property containing of 29 Acres,
more or less.)

Witness my hand this Fourth day of February, 19 94

Lucille G. Gerace

This document is only a general form which may be proper for use in simple transactions and in no way acts, or is intended to act, as a substitute for the advice of an attorney. The printer does not make any warranty, either express or implied, as to the legal validity of any provision or the suitability of these forms in any specific transaction.

Cowdery's Form No. 484 — CODE DEED — GRANT — (C. C. Sec. 1092) — (Rev. 1/83)

Deed

to

19

Dated

State of California

ss.

Title or Type of Document

Deed

Number of Pages

1

Date of Document

2/4/94

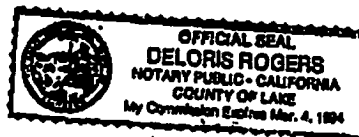
Signer(s) Other than named below

County of LAKE

On February 4, 1994 before me, Deloris Rogers
Notary Public, personally appeared Luella O. Gerace
personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose
name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the
same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

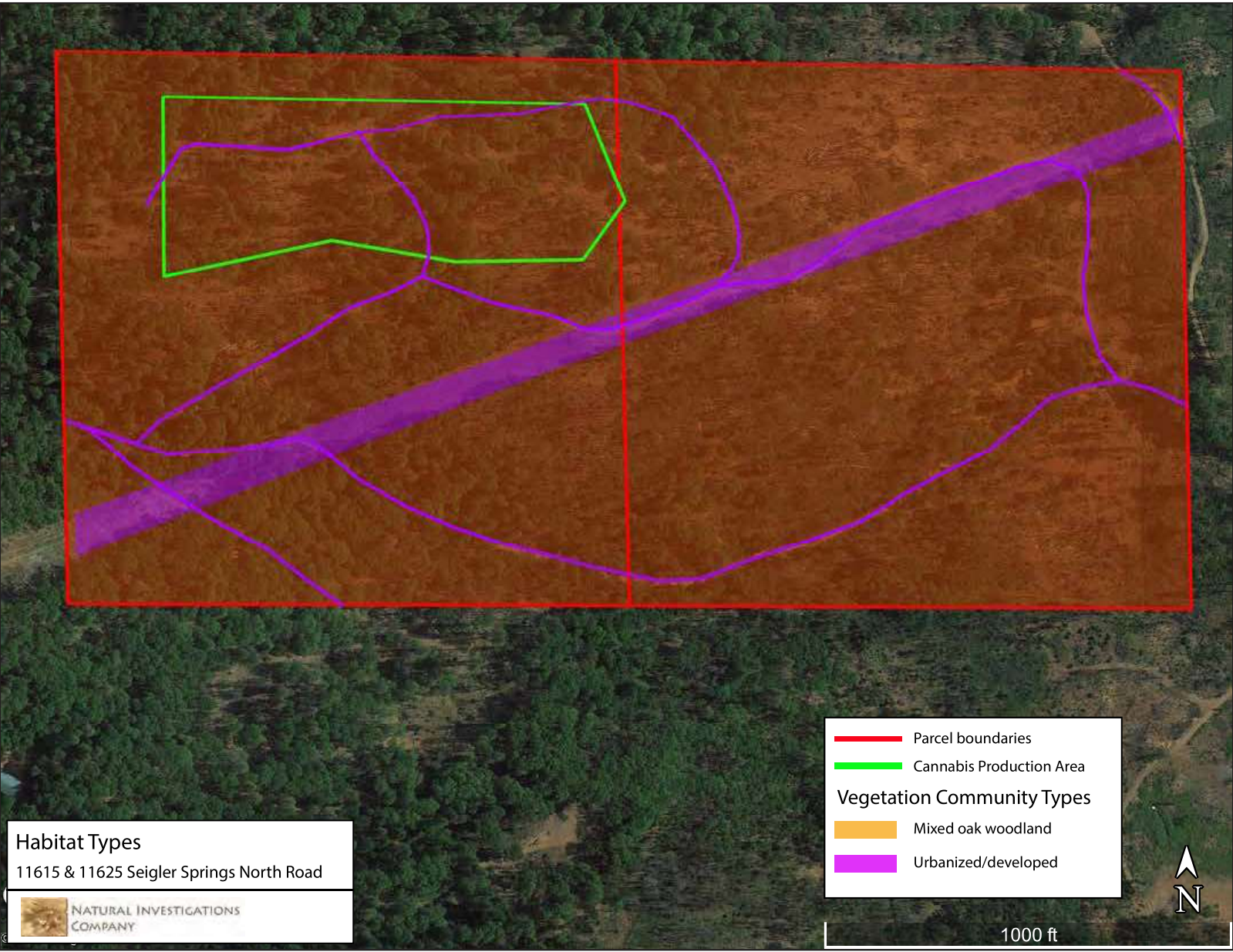
Signature Deloris Rogers (Seal)

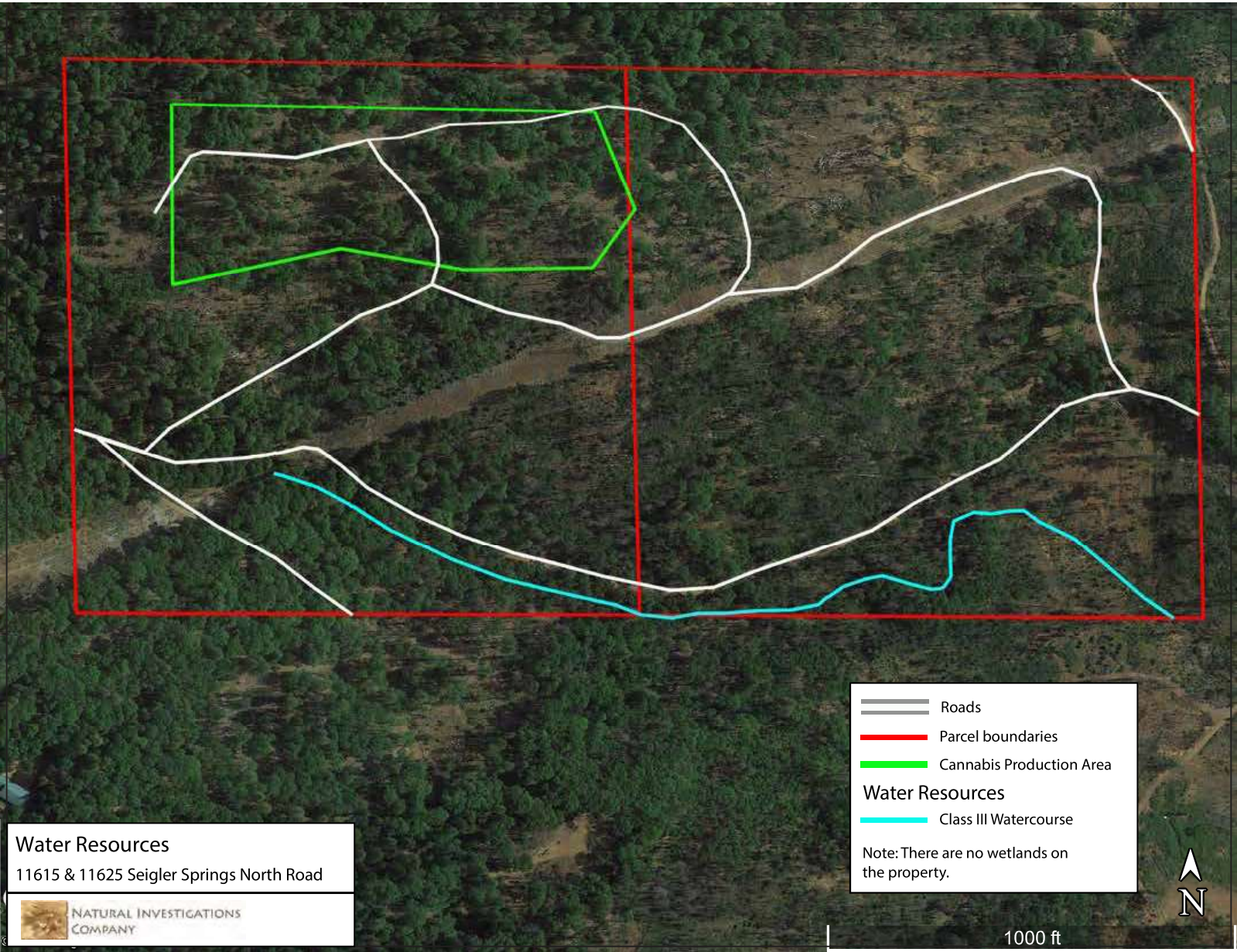


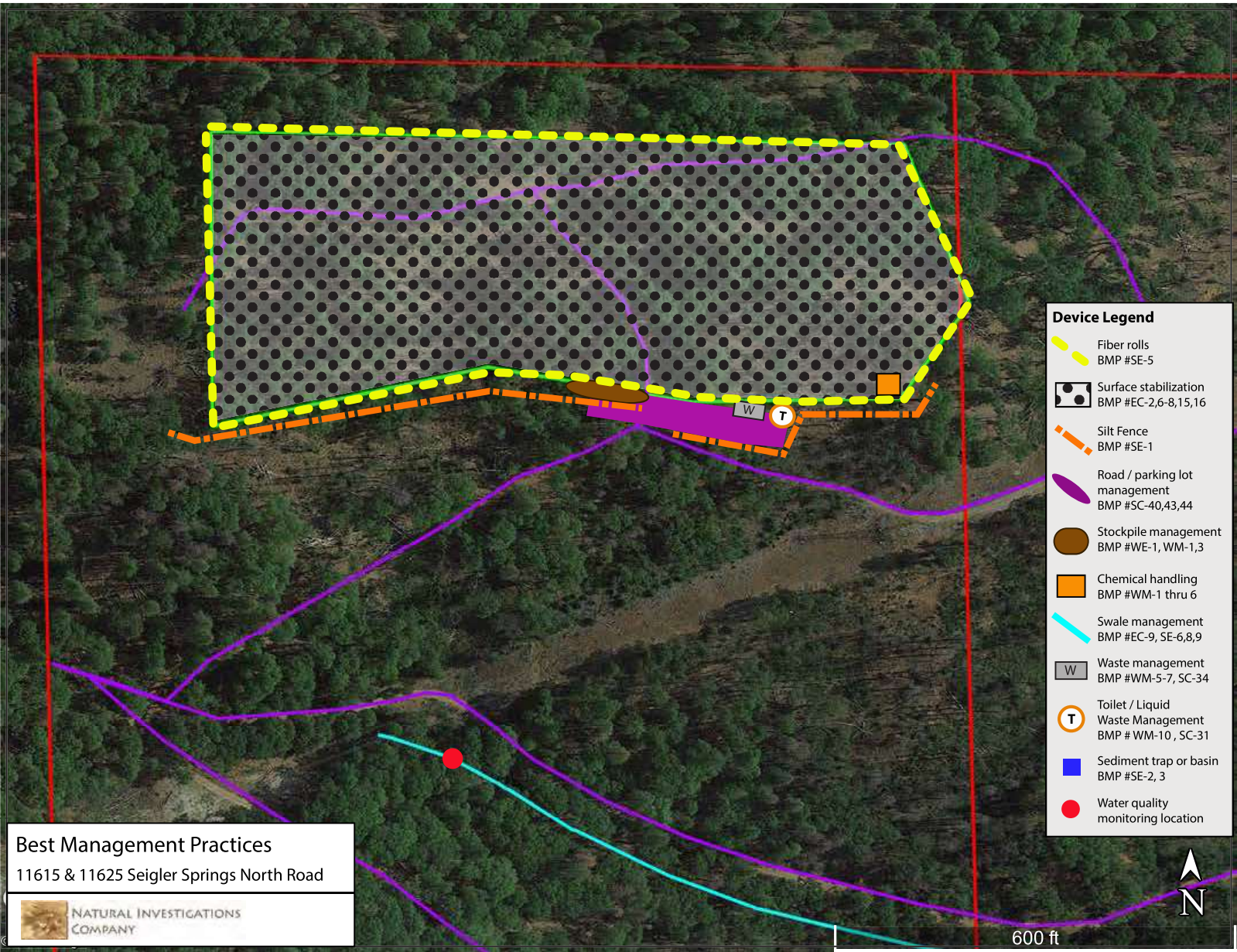
FD-1 (Revised 1/93)

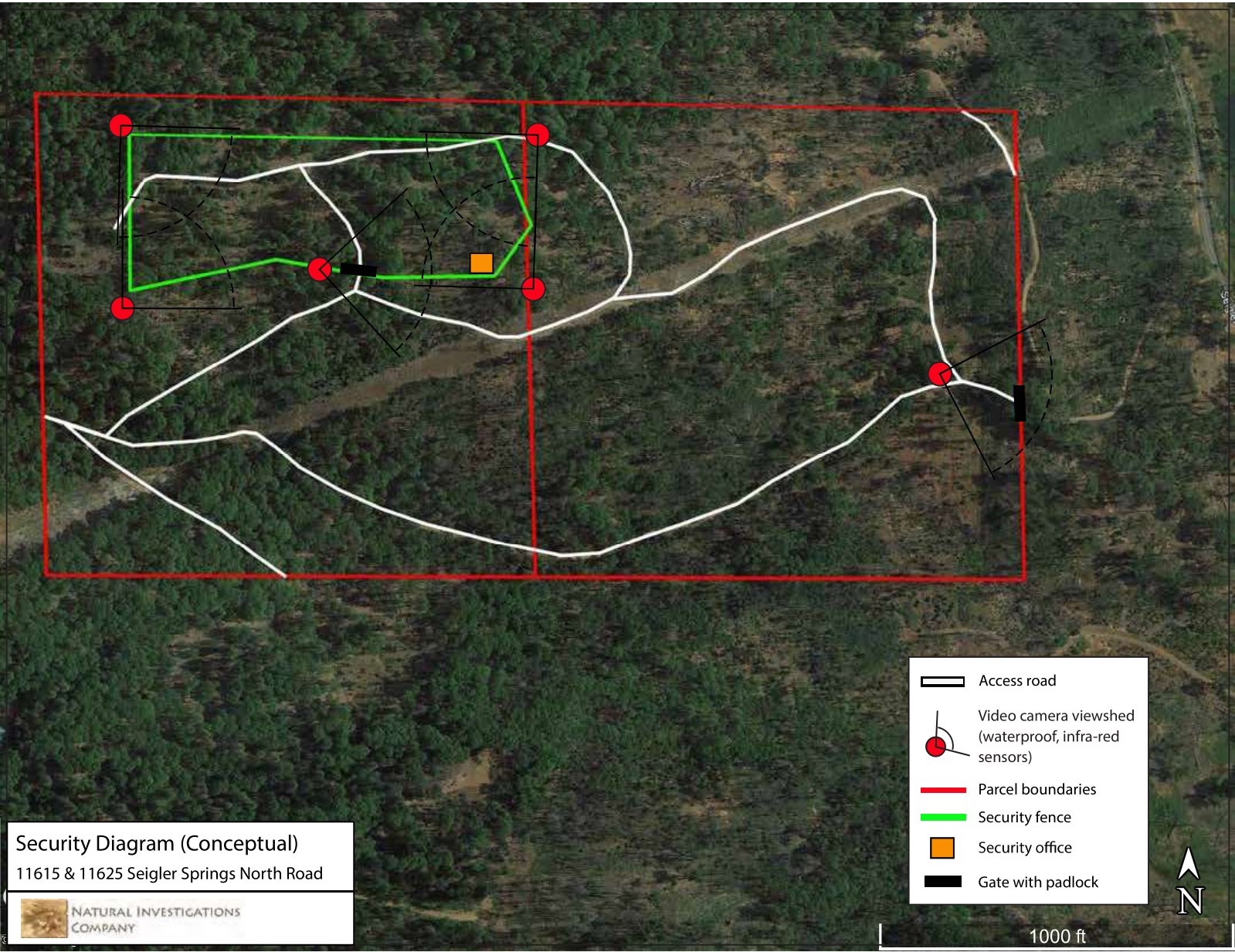
END OF DOC 2

TAB 6



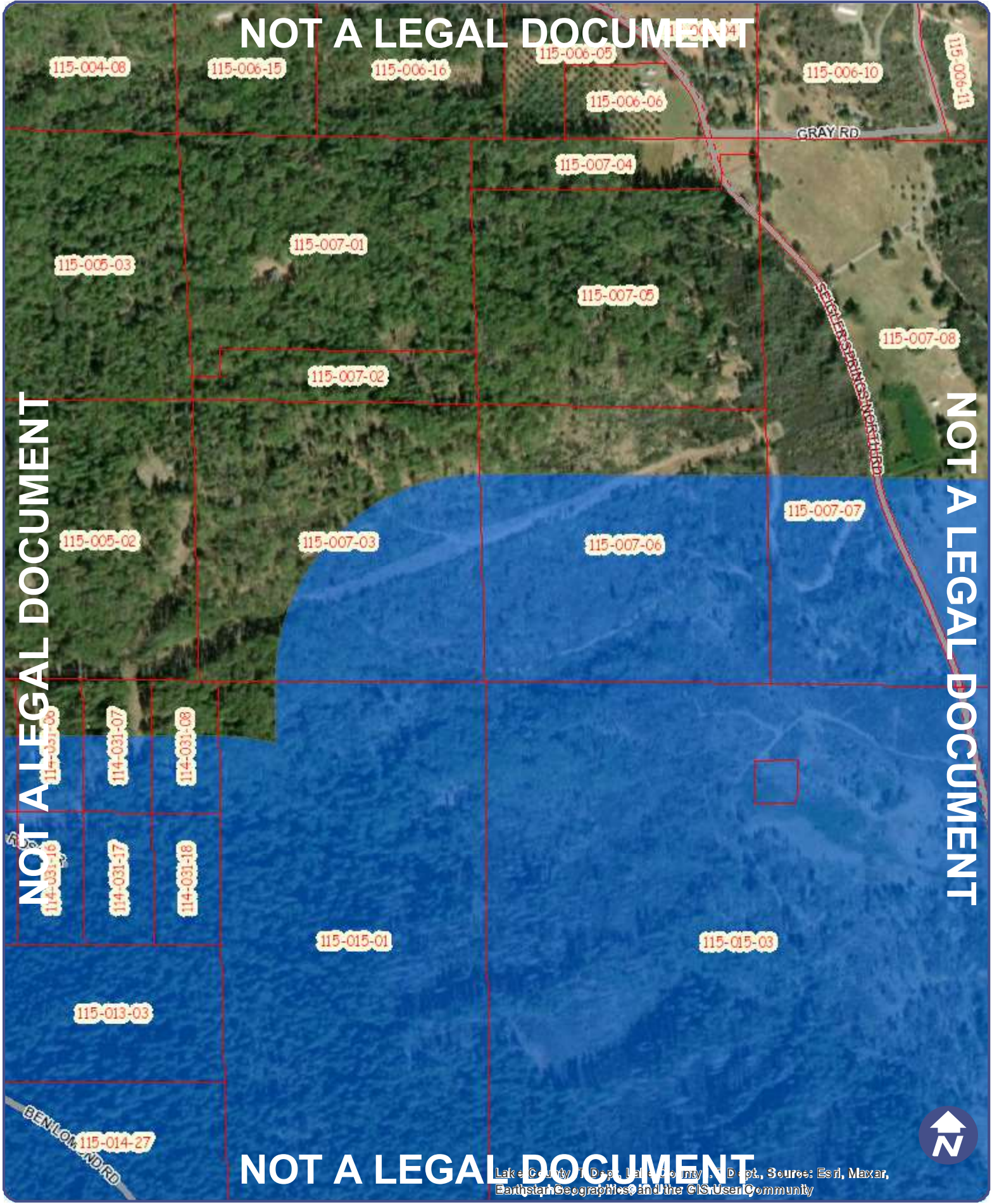






TAB 7

NOT A LEGAL DOCUMENT



NOT A LEGAL DOCUMENT

Lake County T. Dept., Lake County A. Dept., Source: Esri, Maxar, Earthstar Geographics and the GIS User Community

Lake County, CA

Exclusion Area

Web AppBuilder for ArcGIS



All parcel boundaries are approximate. Discrepancies in acreage, shape and location are common. This map is not the legal survey document to be used in single site determinations. Consult your deed for a legal parcel description.

Print Date: 10/24/2023

TAB 8

categories (MapServer)

View In: [ArcGIS JavaScript](#) [ArcGIS Online Map Viewer](#) [ArcGIS Earth](#) [ArcMap](#) [ArcGIS Pro](#)

View Footprint In: [ArcGIS Online Map Viewer](#)

Service Description: IF ANY PORTION OF A PARCEL IS INTERSECTED BY THE EXCLUSION ZONE THE ENTIRE PARCEL IS EXCLUDED Categories in exclusion zone: -Publicly owned land -"SOS" zoning combining district. -1000 foot buffer from: Community Growth Boundaries Incorporated cities Water districts (public and private) Water district spheres of influence Federal Indian trust lands

Map Name: Layers

[Legend](#)

[All Layers and Tables](#)

[Dynamic Legend](#)

[Dynamic All Layers](#)

Layers:

- [2016 FMMP Designations](#) (0)
- [1000' Buffer from Public Water Districts](#) (1)
- [1000' Buffer from Private Water Districts](#) (2)
- [1000' Buffer from Water District Spheres of Influence](#) (3)
- [1000' Buffer from Community Growth Boundaries](#) (4)
- [1000' Buffer from Federal Indian Trust Lands](#) (5)
- [1000' Buffer from Incorporated Cities](#) (6)
- [Publicly Owned Land](#) (7)
- ['SOS' Zoning Combining Districts](#) (8)
- [Farmland Protection Zone and 1000' Buffer](#) (9)

Description:

Copyright Text:

Spatial Reference: 102642 (2226) VCSWkid(115702) LatestVCSWkid(115702)

Single Fused Map Cache: false

Initial Extent:

XMin: 6043034.874090161

YMin: 2119273.9341476467

XMax: 6731524.966025075

YMax: 2341911.7941218177

Spatial Reference: 102642 (2226) VCSWkid(115702) LatestVCSWkid(115702)

Full Extent:

XMin: 6247362.332016641

YMin: 2002937.8752039357

XMax: 6466907.921490367

YMax: 2341621.080114315

Spatial Reference: 102642 (2226) VCSWkid(115702) LatestVCSWkid(115702)

Units: esriFeet**Supported Image Format Types:** PNG32,PNG24,PNG,JPG,DIB,TIFF,EMF,PS,PDF,GIF,SVG,SVGZ,BMP**Document Info:**

Title:

Author:

Comments: IF ANY PORTION OF A PARCEL IS INTERSECTED BY THE EXCLUSION ZONE THE ENTIRE PARCEL IS EXCLUDED Categories in exclusion zone: -Publicly owned land -"SOS" zoning combining district. -1000 foot buffer from: Community Growth Boundaries Incorporated cities Water districts (public and private) Water district spheres of influence Federal Indian trust lands

Subject: Cannabis cultivation exclusion categories

Category:

Keywords: cannabis, cultivation

AntialiasingMode: None

TextAntialiasingMode: Force

Supports Dynamic Layers: true**MaxRecordCount:** 1000**MaxImageHeight:** 4096**MaxImageWidth:** 4096**Supported Query Formats:** JSON, geoJSON**Min Scale:** 0**Max Scale:** 0**Supports Datum Transformation:** true**Child Resources:** [Info](#) [Dynamic Layer](#)**Supported Operations:** [Export Map](#) [Identify](#) [QueryDomains](#) [QueryLegends](#) [Find](#) [Return Updates](#)
[Generate KML](#)

EXHIBIT B

Holy Domains
Gate





June 9, 2026

Lake County Planning Commission

RE: Major Use Permit PL-26-115

Seigler Springs North LLC / Forest Elie

11615 and 11625 Seigler Springs North Road

Commissioners:

I am writing regarding wildfire risk, emergency access, evacuation, and public safety concerns associated with the proposed Seigler Springs North LLC project.

My comments are limited to wildfire-related issues.

The project is located within a Wildland-Urban Interface environment and within a Very High Fire Hazard Severity Zone. These conditions warrant careful review of wildfire impacts, emergency response capability, and evacuation safety.

The Draft Initial Study concludes that wildfire impacts are less than significant. However, after reviewing the wildfire analysis, I am concerned that many of the conclusions rely primarily on future compliance with fire codes and defensible space requirements rather than a detailed project-specific evaluation of wildfire risk and response if a fire breaks out on the property.

For example, the Initial Study concludes that the project will not impair emergency response or evacuation and states that any required evacuation would occur on Seigler Springs North Road. However, the document does not appear to evaluate evacuation capacity, evacuation timing, traffic conflicts between residents and responding fire apparatus, or the cumulative evacuation demands associated with existing residences, retreat facilities, agricultural operations, and other proposed development in the area.

As both a Fire Marshal and a resident of this community, I have firsthand familiarity with the local road network. In my professional opinion, the existing road system presents significant challenges for emergency access and large-scale evacuation during a major wildfire event.

The wildfire analysis also relies on future compliance with road standards, defensible space requirements, and installation of a 5,000-gallon fire water tank. While these measures may be beneficial, they do not by themselves demonstrate that wildfire impacts have been fully analyzed or reduced to a less-than-significant level.

Several questions remain unanswered:

- Has a project-specific evacuation analysis been conducted?

- Has the cumulative evacuation demand from nearby residences, retreat centers, agricultural operations, and proposed cannabis projects been evaluated?
- What evidence supports the conclusion that emergency access will remain adequate during a significant wildfire event?
- What wildfire prevention training, emergency response procedures, or operational fire safety programs will be required for the project?
- Where is the evidence of fire suppression equipment, procedure, training, and personal protective equipment for employees?
- What analysis demonstrates that the proposed fire protection measures are sufficient for the project and its location?

My concern is not directed toward cannabis cultivation itself. Rather, it is whether the environmental record contains substantial evidence supporting the required findings regarding wildfire risk, evacuation, emergency response, and public safety.

I respectfully request that the Planning Commission carefully evaluate whether the wildfire analysis provides sufficient evidence to support the conclusion that wildfire impacts are less than significant.

Thank you for your consideration.

Respectfully submitted,

Duncan Gamlen

Fire Marshal

Mountain of Attention Sanctuary of the Holy Domains of Adidam

Lake County Planning Commission
c/o Community Development Department
Planning Division
Lakeport, CA 95453
Transmitted by email: planningcounter@lakecountyca.gov
PlanningCommission@lakecountyca.gov
Trish.Turner@lakecountyca.gov

Subject: Comments on Staff Report Dated June 11, 2026, and Lack of Demonstration of a Sustainable Water Supply, Major Use Permit PL-26-115, Seigler Springs North, Proposed Cannabis Cultivation Operation

Dear Planning Commissioners:

I am a Senior Consultant Hydrogeologist with Geosyntec Consultants based in the Oakland, California Office. I have a BS in Geology and a PhD in Earth Sciences and am a registered professional geologist and certified hydrogeologist in California. I have worked as a consulting hydrogeologist for over thirty years. My resume is provided as **Attachment A** to document my qualifications as an expert to review and comment on estimates of sustainable production of groundwater.

I have been engaged by the Divine Avataraic Holy Domains of Adidam Ruchiradam (Adidam Holy Domains) to review documents related to the proposed water supply for the Proposed Seigler Springs North Cannabis Cultivation Operation. Following a summary below, this letter provides some excerpts from the Staff Report and my comments based on my review, experience, and expertise.

SUMMARY

The proposed sole source of water for the project is groundwater from a well completed in fractured volcanic rock (the project well). A few hours of testing document that project well can produce the design flow rate of water for the project in the short term. But the evidence before the Commission does not include any long-term production or testing data, which in my opinion is necessary to support the findings regarding sustainable groundwater supply, potential impacts to the environment and neighboring water resources, fire protection, and associated CEQA compliance.

Insert Document File Name

An abundance of long-term operational data and scientific publications establish that production rates during initial short-term testing of wells completed in fractured rock commonly are not sustainable in the long-term and are notorious for decreases with time. This well-established fact is succinctly documented and explained by a two-page 2004 informational flyer published by the Washington State Groundwater Association *to educate the public and its membership on the proper protection and use of ground water resources*. This publication is cited in a footnote below¹ and is provided as **Attachment B** to this document.

The following section presents some specific excerpts from the Report to the Planning Commission dated June 11, 2026 (Staff Report) and my comments on each. Many of the issues discussed in this letter were previously addressed in a letter dated May 8, 2024, that presents a review by Joe Turner, a colleague at Geosyntec, who also is California Certified Hydrogeologist. Joe's letter is provided as **Attachment C** to this letter.

COMMENTS ON EXERPTS FROM THE STAFF REPORT

Water Supply & Use (Project Summary) – page 6 of Staff Report with highlighting added

“According to the Hydrology Report and Drought Management Plan (Attachment 6), the Well Completion Report was completed in June 2024 and demonstrated that the project's projected water demand of 4.9 acre-feet per year uses a small portion of the site's recharge, which ranges from 22.3 acre-feet in drought years to 30.1 acre-feet during regular rainfall years. The analysis shows that the aquifer stays balanced even during drought years. Well data was collected for other off-site wells; the nearest well is located approximately 320 feet northwest of the project site and the next nearest off-site well is approximately 1,200 feet away. Given the low density of existing wells in the vicinity and the project's requirement for water monitoring and drought management, there is sufficient water to meet the demand without impacting the surrounding area.”

***GT Comments 1:** The evidence before the Commission is insufficient to support the conclusion that the proposed project's groundwater supply is sustainable or that the aquifer remains balanced. The estimated recharge values reported on behalf of the applicant have not been validated and in my opinion are based on flawed assumptions.*

The testing documented by the Well Completion Report dated February 1, 2022 and the Well Test Report dated June 24, 2024, demonstrates only that the well was tested twice, and for only 2 and 6 hours, respectively. These short-term tests do not establish the long-

¹ F. Michael Krautkramer, Robinson, Noble & Saltbush, Inc., 2004, Fractured-rock Wells in the Pacific Northwest foothills: Not your average water source, *Washington State Ground Water Association Informational flyer*, which is included as Attachment B to this letter.

term sustainable yield of the fractured bedrock groundwater source in which the project well is completed.

The groundwater source is within fractures in volcanic bedrock hundreds of feet below the ground surface. The source of recharge is likely from locations at higher elevations hundreds or thousands of feet from the Site where the bedrock fracture system is closer to the ground surface. Much of the recharge likely takes decades or even centuries to reach the well at the site. A small portion of precipitation at the site that percolates into the ground at the Site would take many decades to reach groundwater hundreds of feet below.

The claim that nearby wells will not be impacted is also unsupported by long-term monitoring data. The absence of such data creates uncertainty regarding potential impacts to neighboring groundwater users and groundwater-dependent environmental resources.

Tree Removal and Mitigation (Project Summary) page 7 of Staff Report, second bullet

“The project proposes the removal of 76 mature black oak trees, as well as the removal of several dead and downed trees that will need to be removed for safety. Additionally, 228 black oak saplings will be planted, cared for, and protected for seven years, in areas surrounding the proposed cultivation operation, to mitigate for the black oak trees lost as a result of project/site development.”

***GT Comments 2:** I suggest that the proposed mitigation should require ongoing monitoring, irrigation, annual reporting, and replacement planting for any saplings that fail to survive. In addition, the record should clarify whether the projected annual water demand includes irrigation necessary to establish and maintain the mitigation plantings.*

REQUIRED FINDINGS page 12 of Staff Report, selected excerpts with highlighting added

1. “That the establishment, maintenance, or operation of the use applied for will not under the circumstances of the particular case, be detrimental to the health, safety, morals, comfort and general welfare of the persons residing or working in the neighborhood of such proposed use, or be detrimental to property and improvements in the neighborhood or the general welfare of the County.”

***GT Comments 3:** Because the long-term sustainable yield of the project well has not been adequately tested, estimated or demonstrated, the Commission lacks sufficient evidence to conclude that operation of the project will not adversely affect neighboring*

groundwater resources and/or groundwater-dependent environmental resources. Accordingly, the evidence is insufficient to support Required Finding No. 1..

4. “There are adequate public or private services, including but not limited to **fire protection, water supply**, sewage disposal, and police protection to serve the project. Is consistent with the General Plan, Area Plan, and Zoning Ordinance”

GT Comments 4: *The project relies upon a single groundwater well as its sole source of water. Because the long-term sustainable yield of that well has not been tested or demonstrated, adequate water supply for the project and fire protection have not been documented.*

*The Site Context Section of Final Staff Report (pg 4) states that the “**project parcels are within Very High and Moderate Fire Severity Zones.**” But Item 12 on page 1 of the CEQA Check List dated June 30, 2023 states that the Fire Hazard Severity Zone: California State Responsibility Area (CAL FIRE) [is] **Very High Risk**”.*

*Why this apparent discrepancy in reported fire risk zoning? But regardless, **is the allocation of a single 5,000-gallon water tank sufficient for potential fire suppression needs.***

8. “The Project was adequately analyzed under CEQA, and all impacts associated with the project can be mitigated to a less than significant level.”

GT Comments 5: *For multiple reasons, some of which are discussed above, in my opinion, for compliance with CEQA (1) the viability of the proposed project and potential impacts need further analysis and (2) additional conditional mitigation measures are needed to reasonably achieve a less than significant level of potential impacts.*

ADDITIONAL DISCUSSION

Water supply for proposed project would rely entirely on groundwater produced from a well that taps fractured volcanic rock to a depth of 440 feet. Potential groundwater yields from fractured-rock aquifers are inherently difficult to evaluate because groundwater is within complex fracture networks that typically occupy a small fraction of the rock. In contrast, alluvial aquifers and some sedimentary rocks typically have more uniform porosity and permeability, and groundwater occupies a much large portion of the aquifer.

Yields of wells completed in fractured rock are (1) difficult to estimate, (2) typically require long-term testing and monitoring to establish reasonable estimates of sustainable yield, and (3) commonly decline over time as groundwater levels respond to prolonged pumping, due much slower recharge to fractures compared to drainage of fractures by pumping, and drought conditions.

For these reasons, short-term testing is not a valid method to reliably estimate the long-term yield from the project well to meet the project water demand. Moreover, some of the calculations presented, which support that the proposed water supply is sufficient include technically flawed assumptions, as was also previously addressed in detail in the by Joe Turner (Geosyntec, May 8, 2024).

The uncertainty regarding groundwater availability, potential impacts to neighboring wells, groundwater-dependent ecosystems raises substantial questions that have not been adequately resolved. In addition, the Staff Report identifies numerous existing and approved cannabis cultivation projects within the surrounding area. The record does not adequately evaluate the cumulative effects of groundwater extraction from these projects on shared groundwater resources.

The project site is located within the Seigler Canyon Creek watershed, which is part of the Clear Lake watershed. Seigler Canyon Creek has historically provided habitat for the Clear Lake Hitch (*Lavinia exilicauda chi*), which is a threatened, large minnow endemic to Clear Lake in Lake County, California. These fish are known as "chi" to the local Pomo Tribes and spawn in tributaries to Clear Lake during spring. However, they face high extinction risk in part due to degradation of tributary riparian habitat due to decreases in springs and stream flows. These fish were listed as threatened in California in 2014, were proposed in 2025 for listing and protection by the federal Endangered Species Act.

a state-listed threatened species whose decline has been associated, in part, with Any conclusion that groundwater extraction associated with the project will have no effect on groundwater-dependent ecosystems or connected surface-water resources should therefore be supported by substantial evidence.

The Staff Report places significant reliance on water monitoring and drought management measures. However, monitoring is not mitigation. Monitoring may document groundwater depletion after it occurs, but it neither prevents depletion from occurring, nor restores flows if does occur. The record does not demonstrate that adequate mitigation measures are in place, in the event that impacts occur to groundwater resources and stream flows.

CONCLUSIONS

In conclusion, the evidence before the Commission is insufficient to demonstrate (1) an adequate sustainable source of groundwater to meet the project demands, and (2) to support the Required Finding No. 8 that all potential impacts associated with the project can be mitigated to a less-than-significant level. At a minimum, the unresolved questions regarding sustainability of the proposed groundwater supply, potential cumulative impacts on groundwater resources and groundwater-dependent ecosystems justify the necessity of additional credible evidence, analysis, and review in accordance with the CEQA before potential approval of the project.

Respectfully,



Gordon Thrupp, PhD, PG, CHG

Attachments:

- A. Resume for Gordon Thrupp, PhD, PG, CHG
- B. Washington State Ground Water Association Informational Flyer: Fractured-rock Wells in the Pacific Northwest Foothills: Not your average water source
- C. May 8, 2024, Review by Joe Turner, PG, CHG (Geosyntec) of the May 19, 2023 Hydrology Report and Drought Management Plan by Northpoint

Copies by email to:

Trish Turner, Associate Planner, Trish.Turner@lakecountyca.gov
Mireya G. Turner, Director of Community Development, Mireya.Turner@lakecountyca.gov
Alexander Powell, CFO Adidam Holy Domains, apowell@holydomains.org
Malgorzata Zuk, Attorney, mzuk@katzoffriggs.com
Robert Riggs, Partner, riggs@katzoffriggs.com
Joe Turner, Senior Consultant Hydrogeologist, JTurner@Geosyntec.com



Attachment A

GORDON THRUPP, PhD, PG, CHG

**hydrogeology and geology
aquifer testing and groundwater modeling
sustainable development of groundwater resources
site characterization and remedial design
litigation support**

EDUCATION

PhD, Earth Sciences, University of California, Santa Cruz, 1987

BS, Geology, Stanford University, Stanford, California, 1980

REGISTRATIONS AND CERTIFICATIONS

Professional Geologist (PG), California, Number 5849

Certified Hydrogeologist, California, Number 541

Registered Geologist, Arizona, Number 58233

CAREER SUMMARY

Gordon Thrupp, PhD, has over 30 years of experience as a consulting hydrogeologist. He is an expert in quantitative analysis of flow of groundwater and soil gas. For numerous projects, he has conducted hydrogeologic evaluations and developed groundwater flow models as tools for assessing water resources and engineering design alternatives, designed wells and hydraulic testing programs, and evaluated aquifer-testing and stream flow data. Gordon's areas of expertise include evaluation of sustainable yield of groundwater resources, investigation of the potential for contaminant migration, and conceptual design of remediation alternatives for soil and groundwater. Examples of Gordon's experience follow with focus on evaluation of sustainable production of groundwater from bedrock wells, testifying at public hearings and legal proceedings.

Neutral Expert for Evaluation and Mediation of Influence of Pumping from Bedrock Wells on Spring Flows, San Diego County, California. Gordon was engaged as a neutral expert to advise a judge in arbitration proceedings regarding claims that pumping from bedrock wells completed in the Elsinore Fault Zone interfered with spring flows in a nearby canyon to which one party has water rights. He reviewed hydrogeology, historical data, aquifer tests of wells, and expert reports prepared for each party. Gordon specified aquifer testing and monitoring procedures and analyzed the data. He attended hearings, was deposed, and specified an interim solution that entailed delivery of a portion of the water pumped from the wells to the party with rights to the spring flows that was based on the impact to the springs demonstrated by the testing.

Water Supply Sustainable Yield Assessment at a Proposed Subdivision, San Luis Obispo County, California. Gordon was engaged by SWCA Environmental Consultants to conduct a third-party review for San Luis Obispo County of an assessment of sustainable yield for the Laetitia Agricultural Cluster Subdivision—a proposed development totaling 1,800 acres with 102 1-acre residential lots. Groundwater pumped from four wells completed in fractured bedrock was proposed as the sole water supply for the project. Gordon evaluated hydrogeology, lithologic logs, well construction, production data, and hydrographs; analyzed three phases of pumping tests to estimate sustainable groundwater pumping capacities; and determined that previous estimates of production potential of the wells based on short-term tests were unrealistically high. In addition, Gordon evaluated potential influence of groundwater pumping on the base flow of an adjacent creek. For a more sustainable water supply with reduced impact on the local riparian corridor ecosystem, he recommended curtailment of pumping from July through November for a well with connection to the base flow of a creek. Gordon presented the findings at several public hearings.

Review and Testimony of Modeling of Slant Well Subsurface Intakes at Proposed Desalination Facility, Monterey Regional Water Authority, Monterey Peninsula Water Supply Project, Monterey, California. Gordon reviewed hydrogeology and groundwater modeling of slant well subsurface intakes as documented in draft environmental impact reports for the proposed Monterey Peninsula Water Supply Project. He also prepared rebuttal testimony and was cross-examined during legal proceedings before the California Public Utilities Commission related to the project.

Feasibility Study of Water Wells to Replace Canal Diversions for Irrigation Water, Pacific Gas and Electric Company (PG&E), Butte County, California. On behalf of PG&E and in collaboration with the Butte County Department of Water and Resource Conservation, Gordon evaluated the feasibility of new groundwater wells to replace irrigation water supplied by diversions from a canal originally used for hydroelectric power. The scope of work included characterizing diversions from the canal; estimating the likely yield of wells in the project vicinity and the number of wells required to replace water diverted from the canal; and evaluating the feasibility, including costs, to install wells. The hydrogeology and well yield analysis included review of Department of Water Resources (DWR) well completion reports for 131 wells and hydraulic properties assigned to the Butte Basin Groundwater Model. Gordon developed a probabilistic assessment of well production potential based on the existing production data. Based on the hydrogeologic setting and typical water well yields in the vicinity, Gordon determined that wells are likely not feasible for replacing the water diverted from the canal.

Groundwater Resources Evaluation at the El Toro Area, Monterey County, California. Gordon directed an evaluation of groundwater resources. Tasks included compilation, review, and evaluation of existing geologic and hydrologic data, including available information for over 100

water wells. The objective was to evaluate groundwater resource capacity, and as appropriate recommend revisions to the extent of zoning that restricts development.

Groundwater Production Capacity and Impact Study, Confidential Client, Briones Hills, California. Gordon evaluated groundwater production capacity of fractured bedrock for a proposed development in the Briones Hills Agricultural Preserve. He reviewed an aquifer testing analysis that was done in support of the proposed development. The aquifer testing analysis was technically flawed and did not support that the new well could sustain the design flow rate for the proposed project. Gordon advocated that the aquifer test should not be used in support of a mitigated negative declaration for environmental impact.

Water Resource Capacity Study, San Luis Obispo County, Nipomo Mesa, California. Gordon conducted a groundwater resource capacity evaluation of the Nipomo Mesa area for San Luis Obispo County Departments of Planning and Public Works. The project included reviewing DWR reports, consultant's reports, and regional groundwater models; compiling hydrogeologic data for the area; variable-density flow modeling with SEAWAT to evaluate sea water intrusion for a range of pumping rates; and making recommendations to San Luis Obispo County that were used to determine appropriate limits on growth rates and development on Nipomo Mesa. Gordon presented his findings at public hearings.

Water Supply Feasibility Study and Preliminary Engineering Report, Josephine County, Oregon. In the Illinois Valley, domestic wells were the sole source of drinking water for the town of Kerby. Historically, water in an irrigation ditch provided recharge to shallow alluvial aquifers and sustained the production from many of the domestic wells, but many wells dried up when diversion from the Illinois River to the ditch was stopped. Water quality was a serious health concern where separation distances between septic systems and wells was inadequate. Gordon evaluated alternatives for a community drinking water supply, including a system of community wells, a reservoir in a local drainage, diversion from the Illinois River, and connection to a municipal system at the adjacent City of Cave Junction. He prepared preliminary design and cost estimates for each alternative. Connection to the Cave Junction Municipal Water System was recommended as the most reliable and cost-effective solution.

Review of Groundwater Modeling of Sea Water Intrusion, Confidential Client, Monterey County, California. Gordon provided technical modeling expertise supporting litigation regarding seawater intrusion into aquifers caused by groundwater pumping. He evaluated the design of a proprietary variable-density groundwater flow and transport model that was developed to predict seawater intrusion into aquifers because of proposed increases in the development of groundwater supply along the coastal margin in the Monterey Bay Area.

Review of Hydrogeologic Report and Well Testing, Minor Subdivision, Carmel Valley Highlands, Gordon provided third-party review of aquifer testing and estimated production capacity of a well in fractured bedrock in the Carmel Hills that was proposed as the sole water supply for a proposed development.

Aquifer Pumping Test and Groundwater Production Assessment, City of Poway, Poway, California. Gordon directed a pumping test to assess the potential yield of a groundwater well completed in bedrock and evaluation of the groundwater quality and production capacity of the well for irrigation of a public park. Gordon recommended an operation schedule and maximum drawdown to prevent dewatering of the water bearing fractures.

Bedrock Irrigation Well Feasibility Study, Tamalpais Valley Community Service District, Marin County, California. Gordon conducted a feasibility study of installing wells at community facilities to provide irrigation water. He compiled and reviewed geologic data, including 70 well logs, and evaluated irrigation water needs and costs for well installation. Based on geologic information and statistical analyses of well production data, Gordon determined that the probability was greater than 75% that a single well installed to a depth of approximately 200 feet in Tam Valley would produce enough water of adequate quality to meet the irrigation needs at community facilities.

Fate and Transport Evaluation of Infiltrated Wastewater in Groundwater, Confidential Client, Klamath Falls, Oregon. Dr. Thrupp compiled and evaluated hydrogeologic data in the vicinity of wetlands and ponds to which wastewater is discharged near the Klamath River. He developed a three-dimensional groundwater flow model with MODFLOW and MODPATH to evaluate the fate and transport of the infiltrated effluent. Calculations with the groundwater model indicated that a negligible portion of the infiltrated discharges to the Klamath River and the vast majority that is not removed by evapotranspiration flows downward with groundwater and beneath the river due to a regional pumping at depth.

Feasibility Evaluation of Subsurface Seawater Intakes at Proposed Desalination Facilities, Poseidon Water and West Basin Water District, Huntington Beach and El Segundo, California. Gordon directed compilation and evaluation of geologic, hydrogeologic, geotechnical, and offshore geophysical data for the San Pedro and Santa Monica shelves and coastal margins near proposed desalination facilities, which require seawater intake rates of 127 million gallons per day (MGD) and at least 40 MGD, respectively. Gordon directed development of MODFLOW groundwater flow models as tools to evaluate the feasibility and likely number of wells required to achieve the design intake rate for options including a series of vertical beach wells and slant wells, radial collector wells, and horizontal wells extending beneath the coastal margin. The models were also used to evaluate potential for pumping from the subsurface intakes to lower the water table near coastal margin and draw water from inland aquifers. Gordon also directed

evaluations of alternate sites for subsurface intakes along the coastline of Santa Monica Bay and Orange County in accordance with the California Ocean Plan, and presented at public hearings.

Basin Evaluation and Water Supply Feasibility Study, Soquel Creek Water District, California. Gordon evaluated alternatives to enhance the water supply in the Soquel Creek Water District. Alternatives included additional groundwater pumping, enhancement of recharge, a shared County desalinization plant, diversion from Soquel Creek or exchange of water with an adjacent district, and groundwater banking with aquifer storage and recovery (ASR) wells. The project was part of an environmental impact study for a required California Environmental Quality Act (CEQA) process involving several consulting firms and agencies. In 2017, Gordon was a member of an independent advisory panel convened by the National Water Research Institute (NWRI) for the District's PURE Water Soquel Groundwater Replenishment Project.

Water Supply Assessments, other Technical Studies and Peer-Review for Environmental Impact Reports for Proposed Projects, Several CEQA Projects, Clients include Consulting Firms, Municipalities, and Developers.

Construction Dewatering Modeling for Sub-Grade Parking Garage, Sares Regis, Belmont, California. Gordon reviewed local geology, boring logs, and groundwater monitoring data and developed analytical and numerical dewatering models. The models were calibrated to influx to a test pit to estimate construction groundwater inflow during excavation into fractured bedrock for a mixed commercial and residential development. In addition to estimating flows during construction dewatering, the model was used to estimate long-term groundwater influx rates into a sub-grade drainage system for the garage for design and permitting.

Evaluation of Reservoir Seepage, Confidential Client, Escondido, California. Gordon developed a three-dimensional numerical model to simulate groundwater seepage from a proposed reservoir for storage of recycled water in a bedrock excavation at Harmony Grove Village. The model served as a tool to estimate and compare seepage rates into bedrock from the reservoir with different liner options. The design of the model was based on regional hydrogeology, site-specific hydrogeology and topography, and previous groundwater modeling in the vicinity. The model was also used to evaluate potential flow influence of leakage from the reservoir on Escondido Creek.

Modeling of Influx of Groundwater and Surface Water at the Aromas Quarry, Graniterock, San Benito County, California. Gordon directed the development models to evaluate flux of groundwater and stormwater into a large quarry in granitic rock. Geosyntec also conducted bench-scale testing of both anaerobic and aerobic degradation of benzene in water and sediment samples from the bottom of the quarry, which is associated with naturally-occurring petroleum hydrocarbon deposits near the quarry. The modeling and analyses provided evaluation of the rate

of influx of groundwater and petroleum hydrocarbons with increasing depth of the quarry, potential impact on the adjacent river, water balance for the final pit, and the long-term water level in the quarry and concentration of benzene in the water. The long-term hydrologic condition and potential concentration of benzene and other hydrocarbons in the water in the pit are important components for development of a reclamation plan required for regulatory permitting.

Evaluation of Failed Construction Dewatering, Confidential Client, San Diego, California. For a construction dewatering project, Gordon developed a calibrated numerical groundwater model using MODFLOW for litigation support of changed conditions of permeability. The model also served as a useful tool to design a successful dewatering approach after the initial dewatering effort failed.

Groundwater Influx Management for Open-Pit Mines, Multiple Projects, Multiple Clients, Australia. For three open-pit coal-mines in New South Wales, and two in Queensland, Gordon evaluated hydrogeology, conducted aquifer testing, and developed calibrated regional finite-element groundwater flow models as tools for mine dewatering design. The models were used to help design advance dewatering alternatives and to assess possible impacts on a nearby major river of a mine in the Hunter Valley.

Hydrogeologic Evaluation for Proposed Gold Mining Activities, Confidential Client, Northern Territory, Australia. Gordon performed hydrogeologic evaluations for an environmental impact assessment of proposed gold mining activities at Coronation Hill in Kakadu Park, a world heritage site. He developed a numerical model of groundwater flow through fractured bedrock to assess the possible impact on a nearby river and feasibility of a water supply well for ore processing. Gordon assessed the potential for cyanide in a tailings pond to reach the river.

Litigation Support and Expert Review of Concrete Degradation Model, Confidential Project and Client, Confidential Location. Gordon reviewed a numerical model that simulated solute advection, diffusion, and chemical reaction in concrete. The model was intended to predict future degradation of concrete. Gordon's expert declaration challenging the reliability of the model helped eliminate the model as litigation evidence.

PROFESSIONAL EXPERIENCE

Geosyntec Consultants, San Francisco, California, 2005–Present
S.S. Papadopoulos & Associates, 2000–2005
Geomatrix Consultants, Inc., 1992–2000
Mackie Martin & Associates, Sydney, Australia, 1990–1992
Macquarie University, Sydney, Australia, 1990

Macquarie University/CSIRO, Sydney, Australia, 1987–1990
University of California, Santa Cruz, California, 1980–1987
Texas Testing Laboratories, San Antonio, Texas, 1980
Conoco, Inc., Falls City, Texas, 1979–1980
Stanford University, Stanford, California, 1978
United States Geological Survey, Menlo Park, California, 1977–1979

AFFILIATIONS

National Groundwater Association
Groundwater Resources Association of California
Association of California Water Agencies
California Water and Environmental Modeling Forum

REPRESENTATIVE PUBLICATIONS

Gordon has published several articles in major journals or books and over 25 abstracts in proceedings for professional conferences. A selection follows:

- 25-01 Thrupp, G., J. Lottig, 2025 (*in press*). “Air injection barrier to mitigate migration of soil vapor with chlorinated volatile compounds away from an industrial waste landfill”, Proceedings, *Sardinia 2025: 20th International Landfill Symposium*, CISA, Cagliari, Italy.
- 18-01 McAlary, T., J. Gallinatti, G. Thrupp, W. Wertz, D. Mali, and H. Dawson. 2018. “Fluid Flow Model for Predicting the Intrusion Rate of Subsurface Contaminant Vapors into Buildings.” *Environmental Science and Technology*. vol. 52, issue 15, pp. 8438-8445.
- 16-01 Thrupp, G., J. Chambon, and M. Kavanaugh. 2016. “Site-Specific Hydrogeologic Investigation and Groundwater Modeling to Evaluate Feasibility of Subsurface Intakes for Ocean Water Desalination.” *Abstract for Poster Presentation at University of California, Davis State of Science and Policy Workshop: Weathering Change: The Impact of Climate and the Sustainable Groundwater Management Act on California’s Water*. 4-5 April.
- 11-01 Suchomel, E., M. Verwiël, and G. Thrupp. 2011. “A New Method for Calculating Waste Acceptance Criteria for Soil and Landfill.” Proceedings, *Sardinia 2011: 13th International Waste Management and Landfill Symposium*, eds., R. Cossu et al., CISA, Cagliari, Italy.
- 10-01 McAlary, T., P.J. Nicholson, L.K. Yik, D.M Bertrand, and G. Thrupp. 2010. “High Purge Volume Sampling—A New Paradigm for Sub-slab Gas Monitoring.” *Ground Water Monitoring and Remediation*, vol. 30, issue 2, pp. 73-85.

- 10-02 Nicholson, P., D. Bertrand, T. McAlary, and G. Thrupp. 2020. High purge volume tests for managing variability in sub-slab soil gas. Air and Waste Management Association–Vapor Intrusion. Vol 2. January.
- 08-01 Pearson, A., B. Janke, G. Thrupp, G. Criollo, and H. Franklin. 2008. “Spatial Analysis of Groundwater Resources in El Toro, Monterey County.” *AWRA 2008 Spring Specialty Conference–GIS and Water Resources V*, San Mateo, California. Abstract and poster. 17-19 March.
- 08-02 Thrupp, G., J. Fortuna, H. Franklin, and P. Kwiek. 2008. “Evaluation of Groundwater Resources for Sustainable Development, El Toro Planning Area, Monterey County, California.” Abstract accepted for *AWRA 2008 Annual Water Resources Conference*, New Orleans. November.
- 07-01 Morel, D., M. Verwiel, G. Thrupp, and W. Fowler. 2007. “Study of Basalt Dikes Influence on Groundwater Flow, Waimanalo Gulch Sanitary Landfill, Oahu, Hawaii.” Proceedings, *Sardinia 2007: Eleventh International Waste Management and Landfilling Symposium*, eds. R. Cossu, L. Diaz, R. Stegmann, CISA, Cagliari, Italy.
- 05-01 Thrupp, G., and J. Oster. 2005. “Beware of Limitations of Jacob Methods for Aquifer Analyses.” *California Water & Environmental Modeling Forum (CWEMF) Annual Meeting*, Monterey (Asilomar), California. March. Abstract and poster.
- 04-01 Thrupp, G., and C. Neville. 2004. “Modeling Tidal Dilution of Groundwater Discharging to Surface Water.” *California Water & Environmental Modeling Forum (CWEMF) Annual Meeting*, Monterey (Asilomar), California. February. Abstract and poster.
- 02-01 Neville, C., G. Thrupp, and M. Riley. 2002. “Modeling Tidal Dilution of Groundwater Discharging to San Francisco Bay.” *Geological Society of America Cordilleran Section Meeting*, Corvallis, Oregon, Abstracts with Programs, vol. 34, no. 5, pp. A-111. May.
- 01-01 Verwiel, M., G. Thrupp, S. Purdy, and S. Rogers. 2001. “Landfill Expansion Beneath the Water Table in Central Arizona.” Proceedings, *Sardinia 2001: Eighth International Waste Management and Landfill Symposium*, eds. T.H. Chirstensen, R. Cossu, R. Stegmann, CISA, Cagliari, Italy, vol. 4, pp. 77-86.
- 99-01 Thrupp, G., J. Lamborn, and T. Delfino. 1999. “Landfill Gas Generation Rates Estimated from Pressure Rebound in Extraction Systems.” Proceedings, *Sardinia 99: Seventh International Landfill Symposium*, eds. T.H. Chirstensen, R. Cossu, R. Stegmann, CISA, Cagliari, Italy, vol. 3, pp. 449-456.

- 98-01 Thrupp, G., J. Baker, and J. Gallinatti. 1998. "Leakage Controls Radius of Influence of Landfill Gas Extraction Wells." *Proceedings, the 20th International Madison Waste Conference*, pp. 363-372.
- 96-01 Thrupp, G., J. Gallinatti, and K. Johnson. 1996. "Tools to Improve Models for Design and Assessment of Soil Vapor Extraction Systems." *Subsurface Fluid-Flow Modeling*, ASTM STP 1288, eds. J.D. Ritchey and J.O. Rumbaugh, American Society for Testing and Materials, Philadelphia, pp. 268-285.
- 94-01 Thrupp, G., L. Edwards, K.A. Johnson. 1994. "Tracer Experiments to Investigate Soil Gas Flow Associated with Soil Vapor Extraction." *EOS, American Geophysical Union Transactions*, vol. 75, no. 44, pp. 276.
- 94-02 Thrupp, G., and L. Edwards. 1994. "Implementation of Soil Gas Tracer to Assess and Optimize the Performance of Soil Vapor Extraction Systems." *Groundwater*, vol. 32, pp. 859-860.
- 94-03 Thrupp, G., and D. Wuthrich. 1994. "Earthquake-Induced Water Level Fluctuation Recorded in Chino Basin Wells." *EOS, American Geophysical Union Transactions*, vol. 75, pp. 103-104.
- 93-01 Gallinatti, J., G. Thrupp, and D. Wuthrich. 1993. "Horizontal to Vertical Anisotropy of Hydraulic Conductivity in an Alluvial Fan Aquifer." *EOS, American Geophysical Union Transactions*, vol. 74, pp. 273-274.

Attachment B



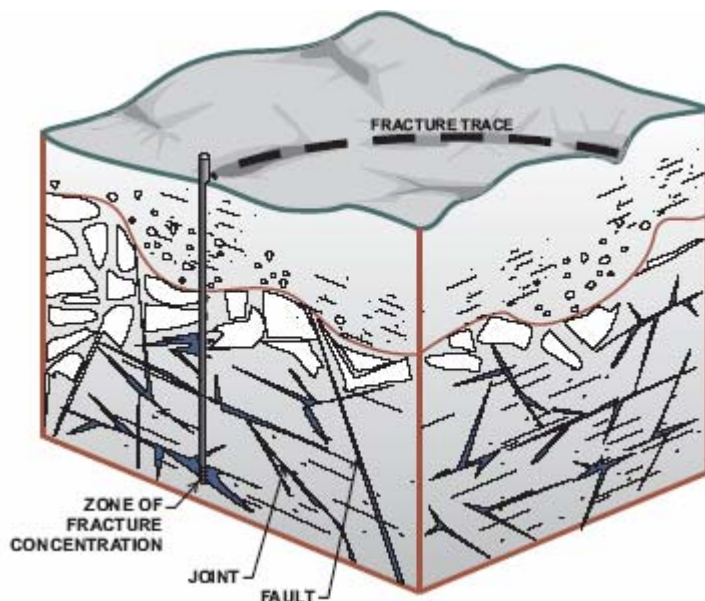
Fractured-rock Wells in the Pacific Northwest foothills: Not your average water source

By: F. Michael Krautkramer, Robinson, Noble & Saltbush, Inc.

Very generally, there are three different geologic settings that support water wells in the Pacific Northwest. The most common setting is unconsolidated sediments laid down by glaciers and rivers (or other erosional processes). While the aquifers formed in these sediments can vary, this setting is clearly the most successful in providing ground water. The next major setting, mostly found east of the

Cascade Mountains, is the regionally extensive basalts like those of the Columbia Plateau. Wells completed in the basalts (or more accurately between the basalt flows) can also be highly variable, but the current understanding of the geometry and hydrogeology of the basalt layers provides some certainty to water development projects. The final geologic setting is much more enigmatic: the fractured-rock groundwater environment of the mountain foothills (particularly the Coast Ranges or Cascades). While wells completed in fractured rock are invaluable in many areas as a source for domestic wells, and occasionally serve as a reliable source for higher production, they tend to be less predictable and less reliable than other wells. The reason lies in the fundamental difference in the way fractures-rock aquifers transmit water.

The ability to transmit water (permeability) in an unconsolidated aquifer is a result of the interstitial spaces (pore spaces) between each individual clast of sediment and the degree to which these spaces are connected to one another. As such, there is a significant amount of open area through which water can flow (typically 10% to 30%). What is more, these characteristics are usually found consistently over a significant lateral extent. Similar characteristics can be found in some rock settings, such as sandstone, where significant amounts of water can flow through the spaces inherent in those types of rock. In hydrogeology, this is called the “primary permeability” of the material.



In a fractured-rock environment, such as found in the foothills of the Cascades and the Coast Ranges (and below the sediment cover elsewhere in the Pacific Northwest), the primary permeability is extremely low. Almost no water at all can pass through the rock itself, so water can only be transmitted through cracks and fractures that result from the folding and faulting of the rock over time. Fractures create “secondary” permeability. Aquifers which rely on secondary permeability generally have much lower capacity to transmit water.

This lower capacity results from both a smaller amount of open space (the size of the fracture) and a smaller lateral extent of the aquifer (fracture zones are not consistent throughout the rock), as

compared to the primary permeability found in sediments. As a consequence, many rock wells are limited in the amount of water that they can reliably produce in the long term. Typically, these wells can have an apparent production during short-term testing that is higher than the actual amount that can be supported by the surrounding fracture-rock aquifer. As a result, the incidence of “well failure” is much higher in fractured rock wells than in other settings.

As if the poor ability to transmit water isn't enough, such settings also usually have difficulty collecting and storing water to transmit. In fractured-rock environments, an appreciably lower percentage of the precipitation over the area ends up getting into the groundwater system. This means that a smaller volume of water is available annually throughout the region served by an aquifer. This concept is known as the aquifer water budget. When more water is being removed through the wells in a region than is recharged from the precipitation (and other sources), the water levels in the wells of that region fall through time. If this is a chronic problem, eventually some or all of the wells become unable to produce water at the rate necessary to meet their demand.

Between the production constraints imposed by permeability issues in fractured-rock and the inherent water budget issues, caution must be used in the use of fractured-rock wells. Monitoring of the water levels and production of a rock well is essential, as is being aware of the regional-level changes (such as: is it a low water year? are neighboring wells experiencing similar patterns of change?). It is easy to be fooled into thinking a fractured-rock well will have a sustainable level of water production based on the initial (short-term) testing. Since these aquifer systems are unique, predicting a long-term production rate takes more care and often cannot be determined just from the testing done when the well is completed. Clearly, when dealing with this type of rock well, forewarned is forearmed—more than one vacation dream property has lost its value when the well gave out. Whether operating a water system or a single well for a home in the hills, keeping records of water levels and production will provide key information in defining a sustainable yield for fracture-rock wells.

The *Washington State Ground Water Association* is dedicated to technical and professional leadership in the advancement of the drilling and ground water industry. The Association produces these informational flyers to educate the public and its membership on the proper protection and use of ground water resources. The Association can be contacted at: (360) 757-1551 or online at www.wsgwa.org

Robinson, Noble & Saltbush, Inc. is a geologic and environmental consulting firm specializing in environmental property assessments and the development and protection of groundwater resources. The company has supported the well-drilling industry for over 20 years as a Technical Division member of the Washington State Ground Water Association. The author may be contacted at: (253) 475-7711 or by email at mkrautkramer@robinson-noble.com

Attachment C



3043 Gold Canal Drive, Suite 100
Rancho Cordova, California 95670
PH 916.637.8328
www.geosyntec.com

8 May 2024

Malgorzata Zuk
Attorney at Law
Katzoff & Riggs LLP
9779 Broadmoor Way
Kelseyville, CA 95451

Subject: Review of May 19, 2023, Hydrology Report and Drought Management Plan – UP 21-17, Seigler Springs North Cultivation Project

Dear Ms. Zuk:

As requested, this letter provides my review of the May 19, 2023, Hydrology Report and Drought Management Plan of the Seigler Springs North Cultivation Project (Report) located in Kelseyville California prepared by Northpoint Consulting Group, Inc. (Northpoint). The scope of work developed for this project is based on the approved Service Order 1 dated April 28, 2024. As outlined in Service Order 1, the primary purpose of this review is to assess whether the May 19, 2023, Report adequately addresses potential impacts to existing groundwater wells and surface waters at the adjacent Mountain of Attention property from the proposed project that includes operation of a groundwater supply well for cannabis operations. Figure 1, provided by the Adidam Holy Domains, shows the location of the proposed cannabis operations including supply well, plus the location of the Mountain of Attention property and their four existing groundwater wells.

OVERVIEW

On June 30, 2023, Lake County published an Initial Study/Mitigated Negative Declaration (IS/MND) regarding a Major Use Permit for commercial cannabis cultivation located 11615 and 11625 Seigler Springs North Road, Kelseyville California [Lake County Planning Department (LCPD), 2024]. Figure 1 shows the location of the proposed project along with an adjacent facility referred to as the Mountain of Attention. On January 26, 2024, the LCPD (2024) issued a revised IS/MND due to mistakes regarding the number of mature healthy oaks to be removed and the amount of water usage for the project. The proposed amount of water usage in the revised IS/MND is 6.6 to 7.8 acre-feet per year.



Figure 1. Location map showing proposed project and adjacent Mountain of Attention Property including location of wells.

As part of the IS/MND, Lake County Ordinance 3106 states that all projects that require a CEQA analysis of water use include a Hydrology Report and Drought Management Plan that provides the following information:

- Approximate amount of water available for the project's identified water source
- Approximate recharge rate for the project's identified water source
- Cumulative impact of water-use to surrounding areas due to project
- Plan to show how the applicant will reduce water use during a declared drought emergency, to ensure both success and decreased impacts to the surrounding areas.

The Northpoint May 19, 2023, report was intended to provide this information.

As indicated in the Northpoint Report, the proposed well is completed within a Quaternary volcanic aquifer where water occurs primarily in fractures, joints, and weathering zones. The Northpoint Report further states that groundwater production in these aquifers vary according to factors such as the density, size, and interconnections of fractures and joints in the local of the well.

The well log provided for the project's proposed well (Attachment 1) indicates the screen interval is from 340 feet below ground surface (bgs) to 440 feet bgs within black volcanic rock. This well log also indicates that during drilling water was first encountered at 380 feet bgs with static water recorded at 360 feet bgs indicating the aquifer is confined (aquifer that is under pressure due to overlying low permeability material). Review of California's Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer>) provided three well logs completed since the year 2000 that also recorded first encountered water and static water levels for wells completed in the volcanic aquifer and supported the interpretation of a confined aquifer (Attachment 1). Figure 2 shows the location of these wells and the proposed project well and Table 1 summarizes the information provided on the well logs.

Table 1. Summary of Well Information for Project Well and Nearby Wells (See Figure 2).

Well I.D.	Date Completed	Screen Interval (Feet BGS)	Aquifer Material	First Water Feet BGS	Static Water Feet BGS	Difference Feet	Estimated Yield GPM
Project Well	2/1/2022	340 to 440	Black Volcanic Rock	380	360	20	40
950538	11/30/2011	262 to 342	Hard Broken Volcanics	240	189	51	26
1089145	5/10/2007	326 to 346	Black Volcanic Rock	325	279	46	40
1093128	3/16/2006	115 to 155	Purple/Brown Rock	80	36	44	100

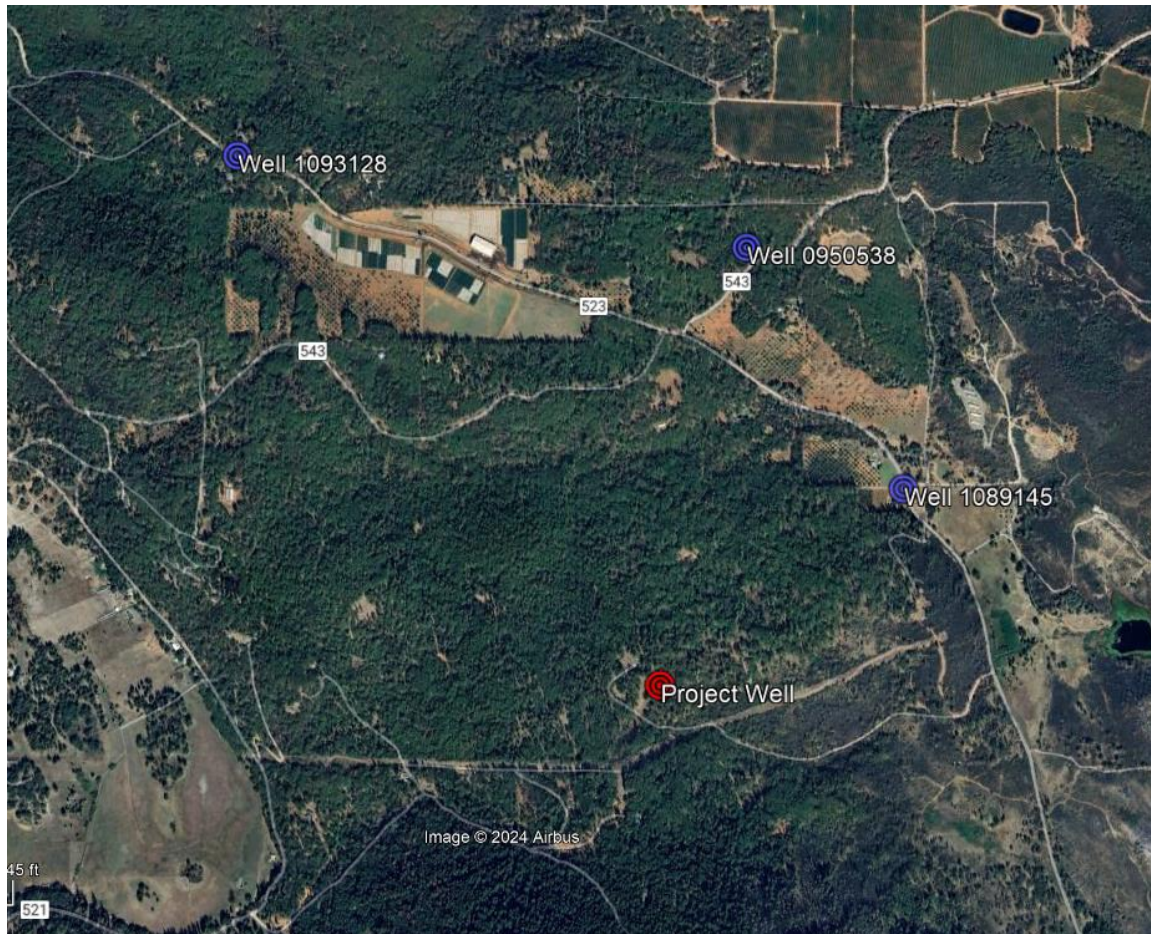


Figure 2. Location of wells with reported first encountered water and static water levels.

Using published data, the Northpoint report uses an estimate 6 gallons per day (gpd) per plant and 3,000 gpd per acre of canopy. The total estimated irrigation water demand per development phase per the Northpoint report is as follows:

- Cultivated area – 4 acres.
- Average daily water use – 12,000 gpd
- Annual use assuming 180-days per year – 2,160,000 gallons or 6.6 acre-feet per year (AFY).

Using the numbers above, the average pumping rate during the cultivation period is about 8.3 gallons per minute (gpm). The reported yield of the project well is 40 gpm based on a 2-hour pump

test conducted during drilling of the well in 2022 (Table 1 and Attachment 1). Drawdown during this test was not recorded. For operations, the Northpoint report indicates that a solar pump capable of about 8 gpm will be used.

The estimated storage of the underlying aquifer was calculated by Northpoint multiplying the aquifer area (estimated from map unit prepared by Hearn et al., 1995) by the aquifer thickness (estimated by difference between average well depth in volcanic unit and measured static water level) multiplied by an assumed specific yield. Table 2 provides the numbers used.

Table 2. Values used by Northpoint to calculate estimated groundwater storage within aquifer.

Aquifer Area (Acres)	Average Depth of Wells (Feet BGS)	Average Depth Static Water Level (Feet BGS)	Average Aquifer Thickness (Feet)	Specific Yield (unitless)
640	314	202	112	0.07

Using these numbers, the estimated aquifer storage is 5,250 acre-feet.

Estimated recharge to the volcanic aquifer was calculated based on annual precipitation, runoff, and evapotranspiration. Using this method an annual recharge between 22.3 AFY to 30.1 AFY was calculated for the 84.56 acre proposed project area.

Cumulative impacts of water use to surrounding areas due to the project were addressed in the Northpoint report by stating: “Due to the distance from the nearest well, recharge estimates which substantially exceed the water use for the proposed project, the high productivity of groundwater wells drilled in local volcanic rock units, and the maximum pumping rate of 8.0 gpm, the proposed project is unlikely to have a significant cumulative impact on surrounding wells.”

COMMENTS

Specific comments to the May 19, 2023, Northpoint report are provided below. First it should be pointed out that the report was not stamped by a qualified California Professional Engineer or Geologist as is required when providing geologic interpretations. In general, this report does not provide the information required by Lake County Ordinance 3106 due to overall estimates of water availability, recharge, and cumulative impacts to surrounding areas using calculations and assumptions consistent with a porous media such as unconsolidated sands instead of the fractured rock system that exists beneath the site. Not recognizing the unique properties of a fractured rock

system in the area could result in significant impacts to the underlying aquifer and other water users in the area. For example, in the High Valley Basin (Basin Number 5-16) located to the north of Clear Lake, California Department of Water Resources (DWR, 2004) indicates that after four years of production using irrigation wells in Holocene Volcanics, well yields were reduced by up to 80 percent over a 4-year period.

Specific Comments

1. The estimated water use may be low.

The Northpoint report projects a water use of 6.6 to 7.8 AFY assuming about 500 plants per acre. However, in a report prepared by the Konocti Consulting Group (2024, Attachment 2), they state that a more realistic number of plants per acre would be 2,000. Using this value along with the numbers provided by Northpoint, the assessment should include the range of water use from 6.6 AFY to 31.2 AFY. Using the higher value of 31.2 AFY, the daily pumping rate for 180 days would be about 39 gpm, the approximate reported calculated yield of the well, 40 gpm (see comment #2 regarding calculation of yield). The hydrology report should evaluate the project using this range of water use.

2. The method used to estimate the yield of the proposed well is incorrect.

The estimated yield of 40 gpm for the proposed well was calculated based on a 2-hour pump test conducted during installation. As noted above, the well is completed within a fractured rock system that can have initial flows of higher value but within a short amount of time can be significantly reduced. The sustainable yield for a fractured bedrock well also has to take into account the drainage of fractures and amount of time to recharge the fractures.

As outlined in California Code of Regulations, Title 22, Section 64554(g)(2), to determine sustained yield of a well drilled in a fractured system two pump tests methods can be used: a 72-hour test and a 10-day test. For each of these tests, if the well has not recovered within a length of time not exceeding the duration of the pumping time of the pumping test (72 hours or 10 days), to within two feet of the static water level measured at the beginning of the well capacity test or to a minimum of ninety-five percent of the total drawdown measured during the test, whichever is more stringent, the well capacity cannot be determined using the proposed pump discharge rate. If the pump test meets these requirements, then 25 percent of the pumping rate would be the representative well capacity for a 72-hour test and 50 percent of the pumping rate for a 10-day test. Although these methods are required for drinking water wells by the State

Water Resources Control Board, Division of Drinking Water, Santa Rosa (Attachment 3), to ensure the proposed project well will not drain fractures within the aquifer system, a similar test should be conducted to establish the appropriate well capacity.

3. The method used to calculate aquifer storage is incorrect.

As discussed above, the aquifer storage was calculated by multiplying the area of volcanic rock unit (640 acres) by the thickness of the aquifer (calculated based on difference between static water levels and well depths) by the specific yield (approximate open spaces for water in rock unit estimated at 0.07). First, even if this was a porous media such as a sand unit, the calculation is wrong. As shown in Table 1, the aquifer system is confined, and the reported static water levels represent a pressure head that is above the aquifer system. As such, the actual aquifer thickness is at least 20 to 51 feet smaller than the 112 feet calculated for the project. Secondly, the specific yield within a porous media approximately represents the effective porosity of the material or open space that water can move through. Within a fractured rock system, this value is based on the nature of the fracture (e.g. open, closed, filled) and connection with other fractures and is almost certainly not the 0.07 value used for the calculation. In fractured rock systems as occurs at the site, only a small number of fractures may be filled with water.

To assess the amount of fractures that contain water, a test hole should be completed, and an acoustic televiewer (to assess number and orientation of fractures) and heat pulse flow meter conducted to assess which fractures transmit water. An example of both these methods are shown in Figures 3 (acoustic/optical televiewer) and 4 (heat pulse televiewer). As seen in these figures, although many fractures may be present, only a small amount are producing water. At the site these measurements were taken near Quincy California, recognition of these features was critical in protecting a supply well for a small hotel.

Based on the information provided above, the actual groundwater storage within the aquifer beneath the proposed project is significantly less than reported and possibly orders of magnitude lower. If this information is not assessed, significant impacts could occur through the drying up of fractures as is discussed further in Comments 4 and 5.

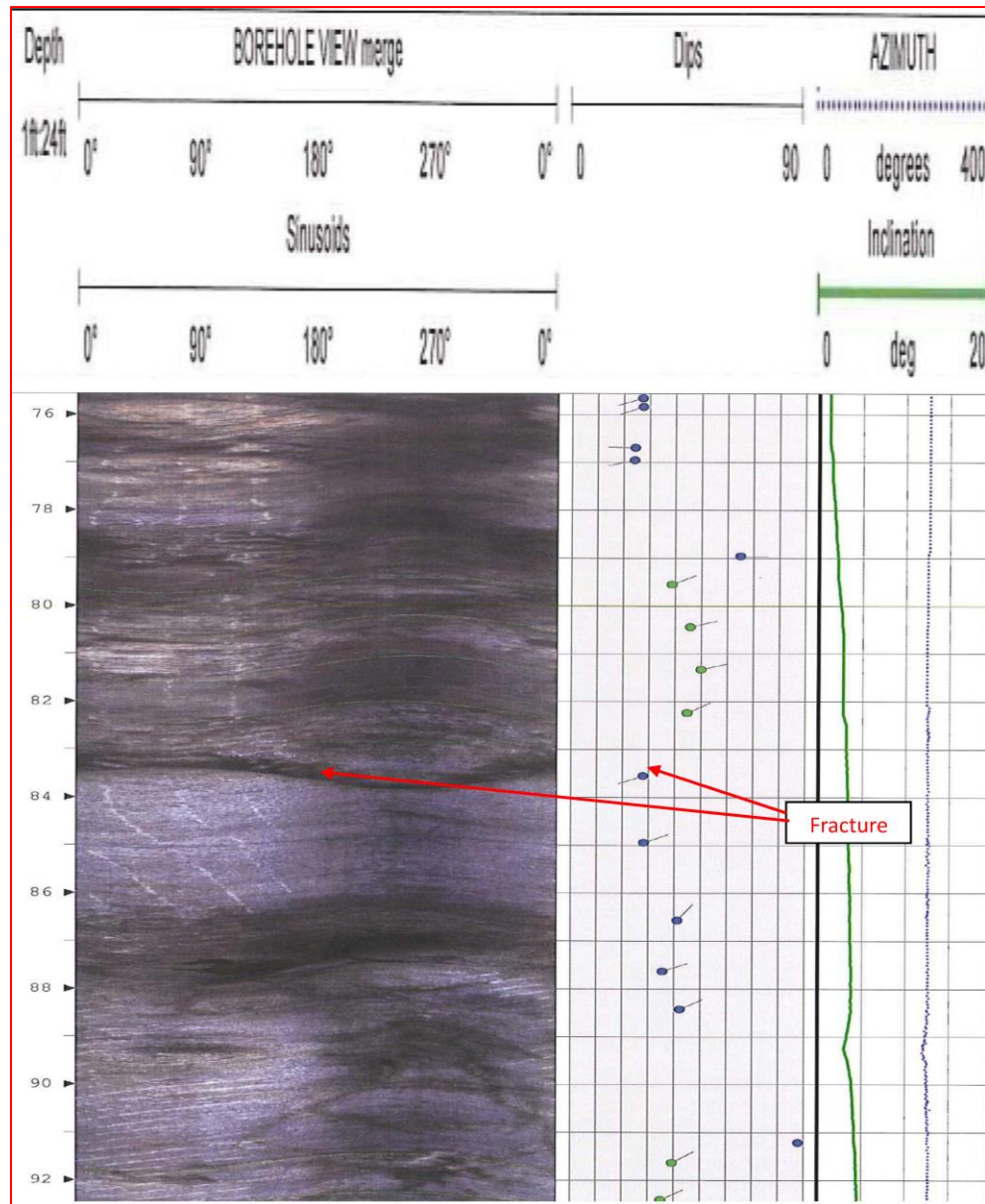


Figure 3. Example of optical televiewer. Blue symbols represent fractures and indicates their dip (angle from horizontal), and the green symbols represent foliations within the rock system and their orientation. The green line to the far left shows the direction the fracture or foliation is trending (compass direction).

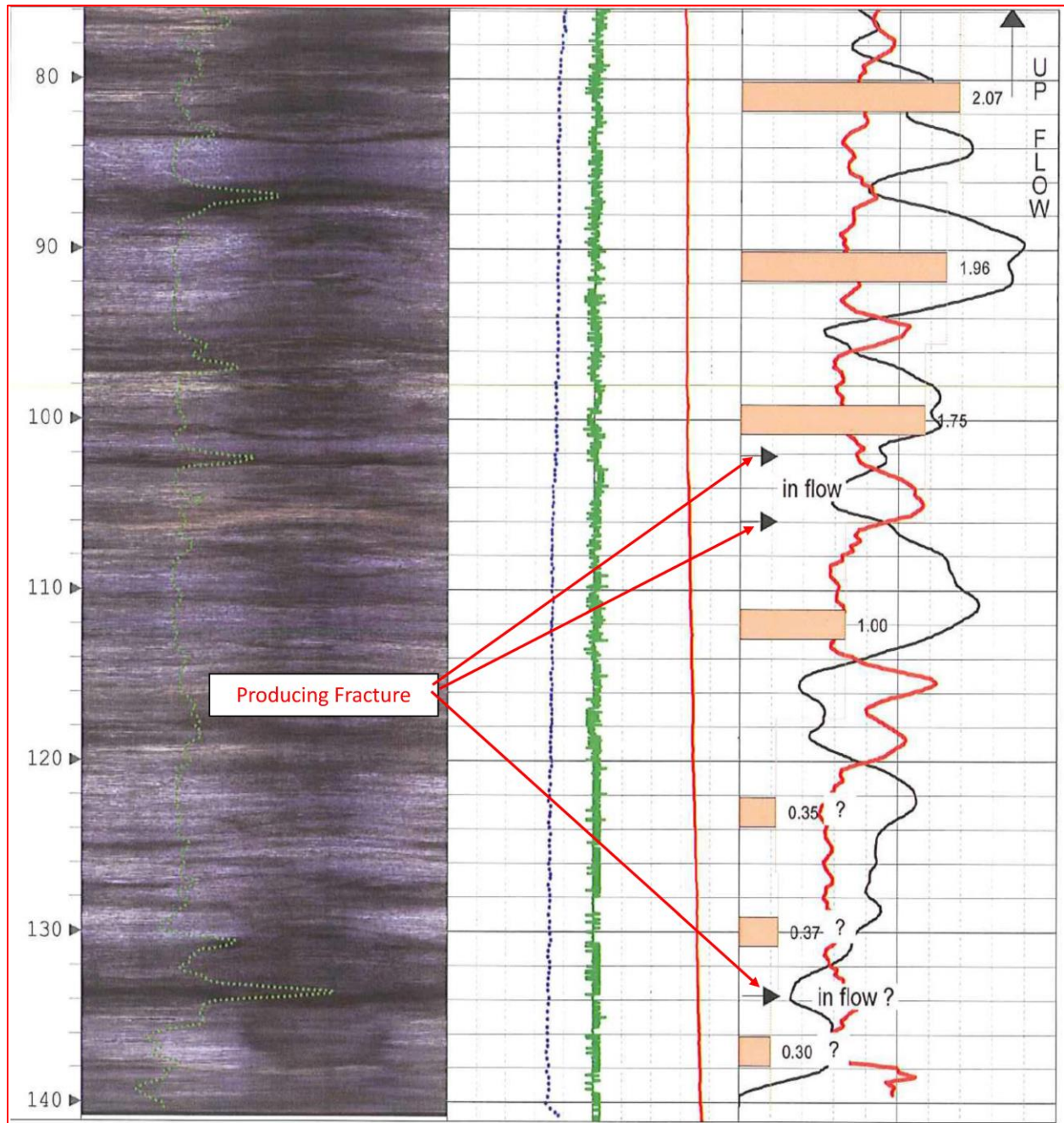


Figure 4. Example of heat pulse flow meter showing which fractures produce water.

4. The method used to calculate aquifer recharge is incorrect.

Aquifer recharge was calculated by assuming that a portion of precipitation at the surface would migrate down to aquifer system. As discussed above, the aquifer system is a confined system and waters from the surface would have to migrate down through the over 300 feet of low permeability rock overlying the aquifer system. In addition, recharge water needs to be at locations where the open fractures are that are connected to the overall aquifer system. The recharge system for this unit is most likely miles away from the project site.

The appropriate way to estimate recharge to aquifer is through the pumping tests discussed under Comment 2. Through this test if water levels do not recover to the starting water levels before the pump test, then there is poor connection between fractures that would recharge the area in which case water levels would decline every time the pump is turned on resulting in continued drying of individual fractures. For the same reasons discussed above for Comment 3, the actual recharge to the aquifer beneath the proposed project is significantly less than reported.

5. An adequate assessment of cumulative impacts to other water uses in the area was not provided.

To provide an accurate assessment of cumulative impacts to the surrounding area, first the orientation and dip of the producing fractures must be known. This information can be obtained by use of the optical televiwer and heat pulse flow meter discussed for Comment 3. For example, if the producing fractures trend towards the northeast or southeast, then pumping on the proposed project well could have significant impact to the existing wells at the Mountain of Attention property.

In addition, until assessments are made on what the actual well capacity and aquifer recharge values are, operation of this well could dry out fractures in the area also resulting in significant impacts to nearby groundwater wells. Anecdotal information already suggests that fractures may be drying out and not being recharged. Attachment 4 provides two reports from adjacent properties. The first report is a summary of operations of four existing wells at the Mountain of Attention (Figure 1). As indicated in this report, pumping conducted years ago on a specific well (date not specified), supplied 80 gpm, 24-hours a day, 7-days a week. For a test conducted in July 2021, this well only supplied water at 80 gpm 6-hours a day before the well went dry. The well did recharge so that it could be pumped the next day. The second report is a memo from Timothy Toye, a local real estate broker, who indicates knowledge of two wells in the area that

have dried up. Both of these reports strongly suggest that the system is being over pumped and not allowing recharge to occur.

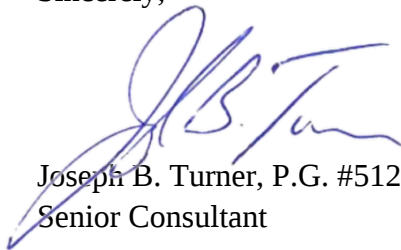
The report also did not assess the presence of springs in the area that could be sourced from this aquifer system. A map showing where springs are located and study to assess potential impacts to these features needs to be completed and if impacts affect surface water flows. In addition, the geologic map provided in the Northpoint report indicates there are faults in the area including one that goes through the project area. The impact on water movement from these faults should be assessed for this project.

OoO

In summary, the Northpoint report does not provide the information necessary to adequately assess if there will be significant impacts to the groundwater system from completion of this project. If the additional information stated above is not collected, then there is reasonable potential that the groundwater system will continue to be depleted throughout the area. This additional information is also needed to develop an appropriate Drought Management Plan as required by Lake County Ordinance 3106.

We appreciate the opportunity to work with you on this project. Please feel free to contact me if you have any questions or require additional detail.

Sincerely,



Joseph B. Turner, P.G. #5125, CHg #454
Senior Consultant



Attachment 1 – Well Logs

Attachment 2 – 2024 Konocti Consulting Group Report

Attachment 3 – State Water Resources Control Board Fracture Bedrock Capacity Testing

Attachment 4 – Anecdotal Well Reports

Attachment 1

Well Logs

File Original with DWR

Owner's Well Number: /

Date Work Begun 1-20-71

Local Permit Agency LAKE County Environmental Health

Permit Number WE-5743 Permit Date 10-9-21

State of California
Completion R
State of California

DWR Use Only - Do Not Fill In

State										Street Number									
Latitude										Longitude									
AFWTRSOther																			

Geologic Log

Orientation ☒ Vertical ☐ Horizontal ☐ Angle Specify
Dyeing Method Air Rotary Dyeing Fluid —

Depth from Surface		Description
Feet	to Feet	
		Describe material, grain size, color, etc.

0	20	Red & Tan clay
20	60	Volcanic Ash & Red volcanic Rock
60	240	Volcanic Ash & Black volcanic Rock
240	440	Black volcanic Rock

Well Owner

Name Seigler Springs Holding LLC
Mailing Address 637 Windham St. STE 205
City San Rafael State CA Zip 94901

Well Location

Address 11615 Seigler Springs N. Rd
City Kelsoville County Lake
Latitude 115 007 03 N Longitude _____
Datum _____ Dec. Lat. _____ Dec. Long. _____
APN Book 115 Page 007 Parcel 03
Township _____ Range _____ Section _____

Location Sketch

(Shirts must be clean before worn as provided)

Nonin

Hy29

Use the above chart to determine the following:
1. The number of pages in the document.
2. The number of pages in the document.

Activity

- ☒ New Well
☐ Modification/Repair
 ☐ Deepen
 ☐ Other _____
☐ Destroy

Planned Uses

- ☒ Water Supply
- ☒ Domestic ☐ Public
- ☒ Irrigation ☐ Industrial
- ☐ Cathodic Protection
- ☐ Dewatering
- ☐ Heat Exchange
- ☐ Infection
- ☐ Monitoring
- ☐ Remediation
- ☐ Sparging
- ☐ Test Well
- ☐ Vapor Extraction
- ☐ Other

Water Level and Yield of Completed Well

Depth to first water 380 (Feet below surface)
 Depth to Static Water Level 360 (Feet) Date Measured 1-31-22
 Estimated Yield 40 (GPM) Test Type A-1.7F
 Test Length 2 HRS (Hours) Total Drawdown _____ (Feet)

Cashings

[illegible]

Annular Material

Depth from Surface Feet to Feet	Fill	Description
0	1	Seal = concrete
1	20	Soil Bentonite
20	440	Filler Pea Gravel

Attachments

- ☐ Geologic Log
☐ Well Construction Diagram
☐ Geophysical Log(s)
☐ Soil/Water Chemical Analyses
☐ Other

Certification Statement

Verification Statement
I, the undersigned, certify that this report is complete and accurate to the best of my knowledge and belief.
Name Will Kerson, Sr.

Name William J. Wilson Well Drilling
P.O. Box 1508
Signed [Signature] City Kelseyville State CA
C-57 Licensed Water Well Constructor Zip 95451

ORIGINAL
File with DWR

MAR - 5 2012

STATE OF CALIFORNIA
WELL COMPLETION REPORT

Refer to Instruction Pamphlet

No. 0950538

DWR USE ONLY — DO NOT FILL IN

12N 08W 13

STATE WELL NO./STATION NO.

LATITUDE LONGITUDE

APN/TRS/OTHER

Page ___ of ___

Owner's Well No. _____

Date Work Began 11-15-11, Ended 12-1-11

Local Permit Agency Health Dept

Permit No. WE 4274 Permit Date 11-4-11

GEOLOGIC LOG

ORIENTATION () ☒ VERTICAL _____ HORIZONTAL _____ ANGLE _____ (SPECIFY)

DRILLING METHOD air rotary FLUID Bentonite

DESCRIPTION mud

Describe material, grain size, color, etc.

DEPTH FROM SURFACE	Ft.	to	Ft.	DESCRIPTION
0	30			Brown Vol. Ash
30	285			Broken Basalt
285	330			White Ash w/ small Rocks
330	342			Hard Broken mixed Colored Volcanics

WELL LOCATION

Address 11200 Piene Drive

City Kelseyville

County Lake

APN Book 115 Page 004 Parcel 07

Township 12N Range 8W Section 13

Lat _____ N Long _____ W

LOCATION SKETCH NORTH

150' N. of 1st Power Pole

ACTIVITY () ☒ NEW WELL

MODIFICATION/REPAIR

_____ Deepen

_____ Other (Specify)

DESTROY (Describe Procedures and Materials Under "GEOLOGIC LOG")

USES ()

WATER SUPPLY

☒ Domestic _____ Public

_____ Irrigation _____ Industrial

MONITORING _____

TEST WELL _____

CATHODIC PROTECTION _____

HEAT EXCHANGE _____

DIRECT PUSH _____

INJECTION _____

VAPOR EXTRACTION _____

SPARGING _____

REMEDIATION _____

OTHER (SPECIFY) _____

WATER LEVEL & YIELD OF COMPLETED WELL

DEPTH TO FIRST WATER 240 (Ft.) BELOW SURFACE

DEPTH OF STATIC WATER LEVEL 189 (Ft.) & DATE MEASURED 11-30-11

ESTIMATED YIELD 26 (GPM) & TEST TYPE air lift

TEST LENGTH 10 (Hrs.) TOTAL DRAWDOWN _____ (Ft.)

* May not be representative of a well's long-term yield.

TOTAL DEPTH OF BORING 345 (Feet)

TOTAL DEPTH OF COMPLETED WELL 342 (Feet)

DEPTH FROM SURFACE			BORE-HOLE DIA. (Inches)	CASING (S)							DEPTH FROM SURFACE			ANNULAR MATERIAL				
				TYPE (≤)				MATERIAL / GRADE	INTERNAL DIAMETER (Inches)	GAUGE OR WALL THICKNESS				SLOT SIZE IF ANY (Inches)	TYPE			
Ft.	to	Ft.	BLANK	SCREEN	CON- DUCTOR	FILL PIPE										Ft.	to	Ft.
0	20	9	X				PVC	4 1/2	160			0	20	X				
20	262	7	X				"	"	"									
262	342	7		X			"	"	200	.032		20	342					3/8 Pea Gravel

ATTACHMENTS ()

_____ Geologic Log

_____ Well Construction Diagram

_____ Geophysical Log(s)

_____ Soil/Water Chemical Analyses

_____ Other _____

ATTACH ADDITIONAL INFORMATION, IF IT EXISTS.

CERTIFICATION STATEMENT

I, the undersigned, certify that this report is complete and accurate to the best of my knowledge and belief.

NAME Larry Herman Drilling

ADDRESS PO Box 1152 Lower Lake Ca 95457

CITY Lower Lake STATE Ca ZIP 95457

Signed Larry Herman DATE SIGNED 12-14-11 465071

C-57 LICENSED WATER WELL CONTRACTOR C-57 LICENSE NUMBER

ORIGINAL
File with DWR

STATE OF CALIFORNIA
WELL COMPLETION REPORT

Refer to Instruction Pamphlet

DWR USE ONLY — DO NOT FILL IN

12N/08W/13

STATE WELL NO./STATION NO.

LATITUDE LONGITUDE

APN/TRS/OTHER

Page ____ of ____

Owner's Well No. _____

No. **1089145**

Date Work Began **5/7/07**, Ended **5/11/07**

Local Permit Agency **Lake County Environmental Health**

Permit No. **WE3803**

Permit Date **12/21/06**

GEOLOGIC LOG

ORIENTATION () ☒ VERTICAL ☐ HORIZONTAL _____ ANGLE _____ (SPECIFY)

DRILLING
METHOD

Rotary

FLUID _____

DEPTH FROM
SURFACE

Ft. to Ft.

Describe material, grain size, color, etc.

0 3
3 12
12 40
40 280
280 290
290 360

Red Soil
Red Clay
tan clay
Gray and Purple and White
Soft Broken Vol. Rock
Black Vol. Rock and Blue Clay
Black Vol. Rock Broken

WELL LOCATION

Address **11435 Sugar Springs North**

City **Kelseyville**

County **Lake**

APN Book **115** Page **007** Parcel **01**

Township **12N** Range **08W** Section **13**

Lat _____ N Long _____ W

DEG. MIN. SEC. DEG. MIN. SEC.

LOCATION SKETCH

NORTH

Future Apmt

100'±

Well

ACTIVITY ()

☒ NEW WELL

MODIFICATION/REPAIR

_____ Deepen

_____ Other (Specify)

DESTROY (Describe
Procedures and Materials
Under "GEOLOGIC LOG")

USES ()

WATER SUPPLY

☒ Domestic _____ Public

_____ Irrigation _____ Industrial

MONITORING _____

TEST WELL _____

CATHODIC PROTECTION _____

HEAT EXCHANGE _____

DIRECT PUSH _____

INJECTION _____

VAPOR EXTRACTION _____

SPARGING _____

REMEDICATION _____

OTHER (SPECIFY) _____

Illustrate or Describe Distance of Well from Roads, Buildings,
Fences, Rivers, etc. and attach a map. Use additional paper if
necessary. PLEASE BE ACCURATE & COMPLETE.

WATER LEVEL & YIELD OF COMPLETED WELL

DEPTH TO FIRST WATER **325** (Ft.) BELOW SURFACE

DEPTH OF STATIC **379** (Ft.) & DATE MEASURED **5/10/07**

WATER LEVEL **40+** (Ft.) & TEST TYPE **Air Lift**

ESTIMATED YIELD **1/2** (GPM) & TEST TYPE

TEST LENGTH **1/2** (Hrs.) TOTAL DRAWDOWN _____ (Ft.)

* May not be representative of a well's long-term yield.

DEPTH FROM SURFACE			BORE- HOLE DIA. (Inches)	CASING (S)						DEPTH FROM SURFACE	ANNULAR MATERIAL			
				TYPE ()				MATERIAL / GRADE	INTERNAL DIAMETER (Inches)		GAUGE OR WALL THICKNESS	SLOT SIZE IF ANY (Inches)	TYPE	
Ft.	to	Ft.	BLANK	SCREEN	CON- DUCTOR	FILL PIPE								
0	40		X				PVC F480	4 1/2	SDR26		X			
40	326		X				PVC F480	4 1/2	SDR26			X		
326	346			X			PVC F480	4 1/2	SDR26	.032				Per Gravel

ATTACHMENTS ()

- Geologic Log
- Well Construction Diagram
- Geophysical Log(s)
- Soil/Water Chemical Analyses
- Other _____

ATTACH ADDITIONAL INFORMATION, IF IT EXISTS.

CERTIFICATION STATEMENT

I, the undersigned, certify that this report is complete and accurate to the best of my knowledge and belief.

NAME **Dan Mc Mullen Well Drilling**

(PERSON, FIRM, OR CORPORATION) (TYPED OR PRINTED)

ADDRESS **1487 Old Long Valley Rd. Chualar CA 94523**

CITY

STATE

ZIP

Signed

Dan L. Mullen

C-57 LICENSED WATER WELL CONTRACTOR

DATE SIGNED

5/11/07

C-57 LICENSE NUMBER

533152

 OSP 03 78836

Attachment 2

2024 Konocti Consulting Group Report

Konocti Consulting Group, Inc.

21373 Highway 175, Unit D, Suite 244, Middletown, CA 95461
Post Office Box 577, Novato, California 94948-0577
(415) 203-4940



March 21, 2024

VIA PRIORITY MAIL

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
12040 North Seigler Springs Road
Middletown, CA 95461

RE: Opposition to Proposed Cannabis Cultivation Project located at:
11615 & 11625 Seigler Springs North Road, Kelseyville, Lake County

Dear Gosia:

Here is a follow up to my letter of March 1, 2024.

I. Water Usage

The California Environmental Quality Act Checklist and Initial Study ("Initial Study") states, in part:

Water Usage

Projected water usage makes several assumptions: (1) that each plant requires 6 gallons of water per plant per day, an accepted industry amount; (2) a total canopy area of 174,240 sq. ft. is assumed; (3) average daily use is 12,000 gallons, and (4) annual usage is ...2,563,200 gallons or about7.8 acre-feet per year (see Initial Study, p. 3).¹

¹ The information is taken almost verbatim from Hydrology memos prepared by NorthPoint Consulting Group, Inc., dated May 18 & 19, 2023. The boundary line plans prepared by NorthPoint are not accurate (see e-mail from Vance Ricks, County Surveyor, dated 11/16/22).

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
March 21, 2024
Page 2 of 7

Cumulative Impact to Surrounding Area

Annual project water demand is projected to be 6.6 to 7.8 acre-feet/year.² Recharge rates are projected to be between 22.3 and 30.1 acre-feet per year. Well data was collected for other vicinity wells; the nearest well is located about 320 feet northwest of the project site³. The other wells are located 1,200 feet or more from the project site (Initial Study, p. 4).

Rather than challenging the findings of the initial study directly, I would point out that the underlying assumptions are flawed. Nowhere is there any indication as to the number of plants that are proposed. The same holds true for the hydrology studies.

We can work backwards from the Initial Study which suggests 12,000 gallons of daily use for 6 gallons per plant. This indicates an assumption of only 500 plants per acre ($12,000/6 = 2,000/4 \text{ acres} = 500$).

500 plants per acre is an unrealistically low number. A more accurate number of plants should be 2,000 plants per acre.

This changes the result considerably.

6 gallons per plant x 2,000 plants per acre x 4 acres = 48,000 gallons per day of water needed. $48,000 \times 180 \text{ day grow cycle} = 8,640,000$ or nearly 200 acre-feet.

Reducing this figure down to simply taking the assumed amount required for 500 plants per acre @ 7.8-acre feet and multiplying it by 4 times the amount, the figure is still 31.2-acre feet per year (Initial Study, p. 3).(see chart next page).

Yet the annual recharge rate is only an average of 26.2 acre-feet per year (Ibid., p, 4).

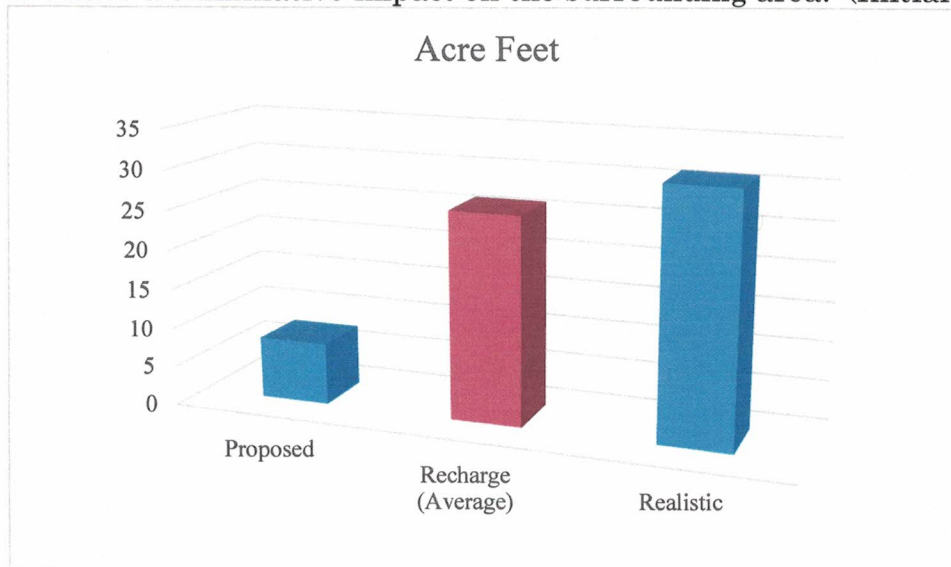
²² The Negative Declaration assumes: (1) each plant requires 6 gallons of water per plant per day; and (2) the total canopy area will be 174,240 sq. ft. Nowhere does the Declaration state the number of plants.

³ I assume this is one of the Domain's wells?

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
March 21, 2024
Page 3 of 7

Nowhere is any document is there an exact number of plants proposed for the cultivation and even more damning is there are no limitations on either the water that can be consumed or the number of plants that can be cultivated.

The realistic drain on the aquifer therefore condemns the findings in the Initial Study that the conclusion that the '[proposed project water use would not have a culminative impact on the surrounding area.]' (Initial Study, p. 4).



The input of Dr. Elliot Hurwitz will be invaluable here.

Also see the attached memo on point designated as Exhibit "A".⁴

The testimony of an actual grower who can comment on the economy of not having enough plants on the grow site would help too.

II. Lack of Lawful Access to Land

As you know, Holy Domains owns two properties adjacent to the proposed project. These are located at 11635 Seigler Springs North Road & 11715

⁴ While the project is registered with the California Regional Water Quality Control Board, the project's technical reports need to be updated (see e-mail from Janue Fried dated 11/22/22).

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
March 21, 2024
Page 4 of 7

Seigler Springs North Road (collectively the “Domain Properties”). The Domain Properties are in immediate proximity to the Project Lands.

The applicant propounding this project is Seiglar Springs Holdings, LLC (the “Applicant”). The Applicant is a Delaware LLC.

The applicants’ original relied on a letter from Danny Prather dated May 25, 2021, purporting to give an easement across the Holy Domain land to the applicants (see Katzoff & Riggs letter dated October 25, 2023 [“MacDonald letter”], Tab 1.

It has been established that Mr. Prather was not an owner of the property and had no right to grant an easement.

Another more complicated chain of title has since been raised alleging an easement was issued by Lilburn Robert Prather and recorded on October 29, 1993, purporting to grant an easement across the Holy Domain land. It has been established that Mr. Prather did not own the land at the time he granted the easement. The after acquired title doctrine might have breathed life into the easement, however, the repeated subsequent transfer of title of the Holy Domain land without any mention of any easement in either the dominant tenement or servient tenement easements extinguishes any such easement claim.

A further analysis of the easement issue is set forth in the memorandum designated ss Exhibit “B” – attached.

III. Native American Tribal Input

We know that the Middletown Rancheria Band of Pomo Indians has jurisdiction over this project. The Initial Study wrongly concludes that the Native American tribes have no interest in this project (Initial Study, p. 7; 22-24). Mike Rivera who is the Tribal Historical Officer for the Middletown

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
March 21, 2024
Page 5 of 7

Rancheria Band of Pomo Indians has indicated a *strong* interest in this project.

It was agreed that Elliot Hurwitz would run point on this issue.

Further information is set forth in the tribal memo attached as Exhibit "C".

It is also important to note that while a 'Cultural Studies' report exists, we have not been provided a copy of it.

IV. Impact on Wildlife and Possibly Endangered Species

Two biology reports have been prepared. One is dated November 9, 2020. This report is seriously out of date and will likely need to be redone.

The second report is not dated.

Both reports make reference to the Clearlake "Hitch", but neither report suggests that it or any other endangered species is likely to be harmed by the proposed development.

I understand that Dr. Jeannine Pfeisser has more information regarding the Hitch that might be helpful. I do not have her contact information, but if I can get it, I will follow up with her.

There are no other red flags regarding endangered species in either report and there is nothing yet concrete to involve the Department of Fish and Wildlife.

More research on this issue might be appropriate.

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
March 21, 2024
Page 6 of 7

V. Project is in an Exclusion Zone

The exclusion zone issue has been well briefed by counsel (see MacDonald letter, p. 4 & 5).

There is no need to rehash the issues here.

VI, Other matters

I again recommend emphasizing that the applicant is a Delaware limited liability company with its office in another County and it has no connection to Lake County.

The view and ascetics issue may still be a good item to raise, however, without again viewing the property and/or having pictures, this is a difficult issue to address in writing.

The protective nature of the Holy Domain land, its dedication to the protection of animals, regional wildlife, and educating children are all positive factors that should be mentioned but are not dispositive.

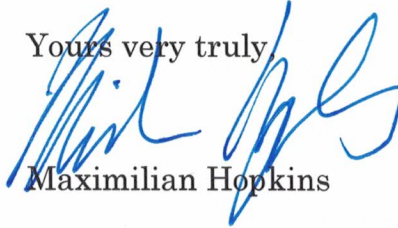
I further recommend it someone can take pictures of the roadway that is the proposed easement, it would be helpful. I can do this, but anyone available can probably do it. Please just make sure the pictures are accurately marked.

Please also let me know if we hear anything about a date for the Planning Commission hearing.

Malgorzata Zuk
The Divine Avataric Holy Domains
of Adidam Ruchiradam
(aka Holy Domains)
March 21, 2024
Page 7 of 7

I will continue to investigate and research the issues and facts to bolster the position of Holy Domain.

Yours very truly



Maximilian Hopkins

MJBH/mh
enc.s, as noted



Exhibit "A"

Exhibit "A"

Memorandum from Konocti



TO: File

FROM: Maximilian J.B. Hopkins (Initials: _____)

DATE: March 18, 2024

REGARDING: Conversation with Elliot Hurwitz re: 11615 and 11625 Seiglar Springs North Road, Kelseyville (Middletown) CA 95451; Major Use Permit UP 21-17; Initial Study IS 21-18; Early Activation EA 21-17

Elliot Hurwitz indicated that he had spoken with Mike Rivera who is the Tribal Historical Officer for the Middletown Rancheria Band of Pomo Indians. Elliot says he had discussed this project with Mike and Mike is very interested in having an observer stationed on site to monitor the situation. Mike also indicated the area is 'rich' in possible native American resources.

The only correspondence received to date is a letter from the Yocha Dehe Tribe dated December 6, 2022, denying jurisdiction and referring the matter to the Big Valley Band of Pomo Indians.

Mike had indicated that the Big Band and Middletown Rancheria have concurrent jurisdiction over the area.

It was agreed that Elliot Hurwitz would run point on this issue.



Exhibit "B"

Exhibit "B"

Memorandum from Konocti



TO: File

FROM: Maximilian J.B. Hopkins (Initials: _____)

DATE: March 20, 2024

REGARDING: The doctrine of 'After Acquired Title'; Noronha vs. Stewart; and Access to the Subject Property

I have reviewed and analyzed the Noronha vs. Stewart case (1988) 199 Cal.App, 3ed 485. I agree with its holding that the 'after-acquired title' doctrine and Civil Code § 1106 bind a non-owner of land who grants an easement prior to actually owning the land if that grantor subsequently acquires title to the property. This holding does not appear dispositive in this case.

According to the Katzoff & Riggs letter of October 25, 2023 ("MacDonald letter"), the applicants are relying upon a letter from Danny Prather, dated May 25, 2021 [MacDonald letter, Tab 1], which states in part that as 'owner of 11635 Seiglar Springs North Road, parcel 115-007-070' grants an access easement across the property.

It is now undisputed that at the time the Prather letter was written, Mr. Prather was not the owner of 11635 Seiglar Springs North Road. This means that Mr. Prather had no right to grant an easement and the purported conveyance is null and void.,

Nowhere in the MacDonald letter is there any indication that Mr. Prather subsequently acquired title to the property giving life to the after acquired title doctrine. The recorded documents attached as exhibits tell the opposite story. Mr. Prather's name does not appear on the change of title nor is there any reference to any purported easement in any of the recorded documents.

It is my analysis that the Noronha vs. Stewart case nor the doctrine of after acquired title apply in this matter with respect to the Prather letter.

A further analysis of the chain of title leads to another issue. It appears that on or about January 12, 1993, James Gerace deeded his title to the property at 11635 Seiglar Springs North Road to Lucille Gerace [APN # 115-007-07] (This is the future Holy Domain land) (see chain of title, *infra*).

On April 2, 1993, James Gerace again deeded the property to Lucille Gerace.

On October 29, 1993, Easement deed recorded from James Gerace [self-proclaimed owner of APN # 115-007-07] to Lilburn Robert Prather, Jr., and Danny G. Prather (1st Grantees)[owners of APN 115-007-03 & 115-007-06] (the future Sieglar Springs land) and Danny C. Prather and Joni L. Prather (second grantees)[APN # 115-015-01]. *James Gerace did not own the property at the time the easement was executed or recorded* [in accord, see Katzoff & Riggs letter of 10/25/23, p. 3].

The issue is that on or about February 4, 2004, Lucille Gerace deeded the land back to James Gerace. Under the doctrine set forth in the Noronha vs. Stewart case, James Gerace could have acquired the right to convey the easement under the 'After Acquired title doctrine'.

The statutory provision provides that where a person purports by proper instrument to grant real property in *fee simple*, and subsequently acquires any title, or claim of title thereto, the same passes by operation of law to the grantee, or his successors (Civil Code § 1106). The issue here involves an easement, not a grant in fee simple, so this code section does not control here.

The doctrine of after acquired title is not dispositive here either. After James Gerace required title to the property, he presumably passed the title via grant deed to others. There is no evidence of this in the current record.

Holy Domain acquired the property on October 30, 2017, from the Lynch Trust, however, there is no mention of any easement making 11635 Sieglar Springs North Road the servient tenement to any other property.

Query: Did Holy Domain obtain a title report prior to purchasing the property?

Sieglar Springs Investments, LLC (Applicant) acquired title to 11615 and 11625 Sieglar Springs (Subject Property) on October 20, 2020. There is again no mention of the easement right in the deed or any indication that these properties are the dominant tenements.

Assuming, in arguendo, that James Gerace had a after acquired right to grant an easement, the easement was extinguished because it was never carried forward in subsequent deeds. If the owners of the easement had such a right, it would have been theirs to transfer, however, they failed to do so, and this break in the chain of title caused the easement to be extinguished.

Further research is required to obtain the necessary legal citations.

Sieglar Springs Chain of Title

Date	Document
January 12, 1993	James Gerace deeds his property at 11635 Sieglar Springs North Road to Lucille Gerace [APN # 115-007-07]
April 2, 1993	James Gerace again deeds his property to Lucille Gerace [APN # 115-007-07]
October 29, 1993	Easement deed recorded from James Gerace [self-proclaimed owner of APN # 115-007-07] to Lilburn Robert Prather, Jr., and Danny G. Prather (1st Grantees)[owners of APN 115-007-03 & 115-007-06] and Danny C. Prather and Joni L. Prather (second grantees)[APN # 115-015-01]. James Gerace did not own the property at the time the easement was executed or recorded [in accord, see Katzoff & Riggs letter of 10/25/23, p. 3].
February 4, 2004	Lucille Gerace deeds the property back to James Gerace [APN 115-007-07] (no mention of an easement). Does the after acquired title doctrine apply here?
October 30, 2017	Holy Domain acquires its property from Lynch Trust (no mention in deed of any easement)[APN 115-007-070]. No mention of any easenents in the deed.
October 20, 2020	Sieglar Springs Investments, LLC (Applicant) acquired title to 11615 and 11625 Sieglar Springs (Subject Property)[APN 115-007-03 & 115-007-06] No mention of any easements in the deed.

Exhibit "C"

Exhibit "C"

Memorandum from Konocti



TO: File

FROM: Maximilian J.B. Hopkins (Initials: _____)

DATE: March 18, 2024

REGARDING: Conversation with Elliot Hurwitz re: 11615 and 11625 Seiglar Springs North Road, Kelseyville (Middletown) CA 95451; Major Use Permit UP 21-17; Initial Study IS 21-18; Early Activation EA 21-17

Elliot Hurwitz indicated that he had spoken with Mike Rivera who is the Tribal Historical Officer for the Middletown Rancheria Band of Pomo Indians. Elliot says he had discussed this project with Mike and Mike is very interested in having an observer stationed on site to monitor the situation. Mike also indicated the area is 'rich' in possible native American resources.

The only correspondence received to date is a letter from the Yocha Dehe Tribe dated December 6, 2022, denying jurisdiction and referring the matter to the Big Valley Band of Pomo Indians.

Mike had indicated that the Big Band and Middletown Rancheria have concurrent jurisdiction over the area.

It was agreed that Elliot Hurwitz would run point on this issue.

Attachment 3

Fractured Bedrock Capacity Testing

**Well Capacity Determination Methods for Wells in Bedrock
Bedrock formation is such that the water produced is yielded by secondary
permeability features (e.g. fractures or cracks)**

NOTE: These testing procedures are based on the California Code of Regulations, Title 22, Section 64554(g). Before beginning any well yield pump test, the Well Completion Report must be reviewed to determine if this is an alluvial or bedrock aquifer. Due to Sonoma volcanics and other formations, the determination often is not clear. It is recommended that you submit the Well Completion Report to this Division to determine the type of pump test procedures to be used.

Methods to determine the sustained yield of a well drilled in a bedrock formation are described below.

Method 1: Report, §64554(g)(1).

The public water system must submit a report for Division review and approval, proposing a well capacity based on well tests and the evaluation and management of the aquifer from which the well draws water. The report must be prepared and signed by a California registered geologist with at least three years of experience with groundwater hydrology, a California licensed engineer with at least five years of experience with groundwater hydrology, or a California certified hydrogeologist. Acceptance of the proposed well capacity by the Division shall, at a minimum, be based on the Division's review and approval of the following information presented in the report in support of the proposed well capacity:

1. The rationale for the selected well test method and the results;
2. The geological environment of the well;
3. The historical use of the aquifer;
4. Data from monitoring of other local wells;
5. A description of the health risks of contaminants identified in a Source Water Assessment, as defined in Section 63000.84 of Title 22, and the likelihood of such contaminants being present in the well's discharge;
6. Impacts on the quantity and quality of the groundwater;
7. How adjustments were made to the estimated capacity based on drawdown, length of the well test, results of the wells test, discharge options, and seasonal variations and expected use of the well; and
8. The well test(s) results and capacity analysis.

Method 2: Pumping Test, §64554(g)(2).

Before the testing:

1. Submit the following to the Division prior to conducting the well capacity test:
 - a. The name and qualifications of the person who will be conducting the test;
 - b. The proposed pump discharge rate;
 - c. A copy of a United States Geological Survey 7 ½-minute topographic map of the site at a scale of 1:24,000 or larger (1 inch equals 2,000 feet or 1 inch equals less than 2,000 feet) or, if necessary, a site sketch at a scale providing more detail, that clearly indicates:
 - I. The well discharge location(s) during the test, and
 - II. The location of surface waters, water staff gauges, and other production wells within a radius of 1000 feet;
 - d. A well construction drawing, geologic log, and electric log, if available;
 - e. Dates of well completion and well development, if known;
 - f. Specifications for the pump that will be used for the test and the depth at which it will draw water from the well;
 - g. A description of the methods and equipment that will be used to measure and maintain a constant pumping rate;
 - h. A description of the water level measurement method and measurement schedule;
 - i. For wells located in or having an influence on the aquifer from which the new well will draw water, a description of the wells' operating schedules and the estimated amount of groundwater to be extracted, while the new well is tested and during normal operations prior to and after the new well is in operation;
 - j. A description of the surface waters, water staff gauges, and production wells-shown in (c)(ii);
 - k. A description of how the well discharge will be managed to ensure the discharge doesn't interfere with the test;
 - l. A description of how the initial volume of water in the well's casing, or bore hole if there is no casing at the time, will be addressed to ensure it has no impact on the test results; and
 - m. A written description of the aquifer's annual recharge.
2. Determine if the test will be conducted for 72 hours or 10 days. If the test is conducted for 72 hours, 25% of the pumping rate will be granted (An assigned well capacity may be revised by the Division if subsequent pumping data collected during normal operations shows that the assigned capacity is not representative of the actual well capacity.) If the test is conducted for 10 days, 50% of the pumping rate will be granted. (An assigned well capacity may be revised by the Division if subsequent pumping data collected during normal operations shows that the assigned capacity is not representative of the actual well capacity.)
3. Ensure discharge from the pump is piped far enough away to avoid recharge.

Conducting the testing:

During the months of August, September, or October, conduct either a 72-hour well capacity test or a 10-day well capacity test, and determine the well capacity using the following procedures:

1. Procedures for a 72-hour well capacity test:
 - a. For the purpose of obtaining an accurate static water level value, at least twelve hours before initiating the next step, pump the well at the pump discharge rate proposed in step 1(b), Before the Testing, for no more than two hours, then discontinue pumping;
 - b. Measure and record the static water level and then pump the well continuously for a minimum of 72 hours starting at the pump discharge rate proposed in step 1(b), Before the Testing;
 - c. Measure and record water drawdown levels and pump discharge rate:
 - I. Every thirty minutes during the first four hours of pumping,
 - II. Every hour for the next four hours, and
 - III. Every four hours thereafter until the water drawdown level is constant for at least the last four remaining measurements, and;
 - d. Enter the measurements on the attached spreadsheet using the tab corresponding to the test performed. A plot will automatically be generated on the Graph tab corresponding to the test performed. If you choose not use the attached spreadsheet, plot the drawdown and pump discharge rate data versus time data on semi-logarithmic graph paper, with the time intervals on the horizontal logarithmic axis and the drawdown and pump discharge rate data on the vertical axis.
2. Procedures for a 10-day well capacity test:
 - a. For the purpose of obtaining an accurate static water level value, at least twelve hours before initiating the next step, pump the well at the pump discharge rate proposed in step 1(b), Before the Testing, for no more than two hours, then discontinue pumping;
 - b. Measure and record the static water level and then pump the well continuously for a minimum of 10 days starting at the pump discharge rate proposed in step 1(b), Before the Testing;
 - c. Measure and record water drawdown levels and pumping rate:
 - I. Every thirty minutes during the first four hours of pumping,
 - II. Every hour for the next four hours,
 - III. Every eight hours for the remainder of the first four days,
 - IV. Every 24 hours for the next five days, and
 - V. Every four hours thereafter until the water drawdown level is constant for at least the last four remaining measurements, and;
 - d. Enter the measurements on the attached spreadsheet using the tab corresponding to the test performed. A plot will automatically be generated on the Graph tab corresponding to the test performed. If you choose not use the attached spreadsheet, plot the drawdown and pump discharge rate data versus time data on semi-logarithmic graph paper, with the time intervals on the horizontal logarithmic axis and the drawdown and pump discharge rate data on the vertical axis.

Recovery Data:

The well must demonstrate that, within a length of time not exceeding the duration of the pumping time of the pumping test (72 hours or 10 days), the water level has recovered to within two feet of the static water level measured at the beginning of the well capacity test or to a minimum of ninety-five percent of the total drawdown measured during the test, whichever is more stringent. If the well recovery does not meet these criteria, the well capacity cannot be determined using the proposed pump discharge rate.

1. To demonstrate meeting the recovery criteria, the following water level data in the well shall be measured, recorded, and compared with the criteria:
 - a. Every 30 minutes during the first four hours after pumping stops,
 - b. Hourly for the next eight hours, and
 - c. Every 12 hours until either the water level in the well recovers to within two feet of the static water level measured at the beginning of the well capacity test or to at least ninety-five percent of the total drawdown measured during the test, whichever occurs first.

Well Capacity:

Following completion of a 72-hour or 10-day well capacity test, the well shall be assigned a capacity no more than:

- For a 72-hour test, 25 percent of the pumping rate at the end of a completed test's pumping. (An assigned well capacity may be revised by the Division if subsequent pumping data collected during normal operations shows that the assigned capacity is not representative of the actual well capacity.)
- For a 10-day test, 50 percent of the pumping rate at the end a completed test's pumping. (An assigned well capacity may be revised by the Division if subsequent pumping data collected during normal operations shows that the assigned capacity is not representative of the actual well capacity.)

Submittal to the Division:

A report must be submitted to the Division that includes, but is not limited to:

1. Pumping test methods and calculations.
2. Static water level, pump discharge rate, all recorded drawdown and recovery data from the attached spreadsheet. If a transducer is used, provide an electronic file of the transducer data.
3. Other pertinent observations associated with the well capacity test.
4. Plot of the drawdown, pump discharge rate, and time data.

Attachment 4
Anecdotal Reports

WELLS

I. The Four Wells on the Mountain Of Attention Sanctuary (numbered in the same order as on the enclosed map)

The Mountain Of Attention Sanctuary, which has just celebrated its 50th anniversary, is owned and operated by a church, the Adidam Holy Domains. The Sanctuary uses water for four main purposes:

- drinking, cooking, and bathing by the Sanctuary residents, congregational members of Adidam who live in or near Lake County and attend events at the Sanctuary, and retreatants from all over the United States and other countries;
- healing, sacred occasions, and spiritual initiation:
 - the Bath Lodge, with an indoor pool and hot water baths,
 - Holy Grotto fed by the Sigler Canyon Creek that originates on the property owned by the applicants;
- fire protection—one of the reservoirs on the Sanctuary is specifically used to store water for firefighting; two lakes on the Sanctuary have been used by firefighting helicopters to collect water and put out fires in the surrounding areas; and
- care of the Sanctuary lawns and gardens.

1. **Well at The Man of “Radical” Understanding (APN 115-007-08)**

- provides drinking water for the retreat quarters;
- serves as an additional source of water for firefighting.

2. **Well at APN 115-007-07**

- an additional source of drinking water for the entire Sanctuary

3. **Well at Tall Animals Land (APN 115-015-02)**

- well depth: 270’
- 3-phase pump set at approx. 200’
- from this well, the water is pumped to:
 - a reservoir from which it is distributed to the rest of the Sanctuary by gravity feed for irrigation of gardens and lawns,

- a reservoir where water is held in reserve for firefighting.
- During a test conducted years ago, this well supplied 80 gallons a minute, 24 hours a day, 7 days a week. The test was done for 1 week.
- During tests conducted since July 2021, the pump supplied water only 6 hours a day: 3 hours in the morning and 3 hours in the evening, before the water was depleted such that the pump could not pump any more water until the next day. This shortage compromises the ability to protect the Mountain Of Attention Sanctuary from wildfires and to care for the Sanctuary gardens and outdoor holy sites used by the congregational members and retreatants for sacramental occasions.

4. Well at Fresh Milk (APN 115-017-07)

- Metered well, providing drinking water for the Sanctuary.
- Well depth: 240'
- Pump depth 125'
- The potable water pump supplies 36 gallons per minute

II. Two wells on the property of Greg Purnell (APN 115-007-05)

III. One well on the property of Daniel Apte located at 10976 Rosa Trail, Kelseyville, CA 95451 (APN 114-031-08); approximately 4.7 acres

- well depth 700'
- required a \$10,000 filtration system to make the water potable.

Date: May3, 2024
From: Timothy Toye

There is a property at 10623 Highway 175, Kelseyville, CA 95451, that is at the headwaters of Cole Creek which runs into Clear Lake, and about 2700 yards from the proposed grow area at 11615 & 11625 Seigler Sps Rd N. The owners of this property drilled a well and built a home in 2011. After they built the property the well dried up. They are elderly, and do not have the funds to drill another well currently, and so are buying water.

I own a property at 9031 Hwy 175, which is about 3 miles from the grow area but through which Cole Creek, supposedly a year round creek, runs. I have owned the property for about 20 years. In recent years Cole Creek has stopped running during the summer and instead, puddling, hardly how you would describe a year round creek. The well there was drilled in 1970. However in 2019 the well suddenly dried up and I had to drill a new well.

Professionals involved locally in the well drilling and pump servicing industries over the years will tell you that a commonly known fact in Lake County is that aquifers have been dropping over recent years with recent development especially from the dramatic growth in grape and cannabis acreage that has occurred, so wells drying up is not unusual, and it is a stress for property owners having to drill new wells, and see creeks diminish in flow.

I operate a real estate brokerage and have sold real estate locally for 30 years, so I am exposed to this kind of information regularly.

Regards,
Timothy Toye
Real Estate Broker
Timothy Toye & Associates
707-928-5912 direct
707-355-1956 text
707-416-4557 fax
Timothy@TeamToye.com
www.TeamToye.com

June 9, 2026

Lake County Planning Commission

RE: Major Use Permit PL-26-115

Seigler Springs North LLC / Forest Elie

11615 and 11625 Seigler Springs North Road

Commissioners:

I am writing regarding wildfire risk, emergency access, evacuation, and public safety concerns associated with the proposed Seigler Springs North LLC project.

My comments are limited to wildfire-related issues.

The project is located within a Wildland-Urban Interface environment and within a Very High Fire Hazard Severity Zone. These conditions warrant careful review of wildfire impacts, emergency response capability, and evacuation safety.

The Draft Initial Study concludes that wildfire impacts are less than significant. However, after reviewing the wildfire analysis, I am concerned that many of the conclusions rely primarily on future compliance with fire codes and defensible space requirements rather than a detailed project-specific evaluation of wildfire risk and response if a fire breaks out on the property.

For example, the Initial Study concludes that the project will not impair emergency response or evacuation and states that any required evacuation would occur on Seigler Springs North Road. However, the document does not appear to evaluate evacuation capacity, evacuation timing, traffic conflicts between residents and responding fire apparatus, or the cumulative evacuation demands associated with existing residences, retreat facilities, agricultural operations, and other proposed development in the area.

As both a Fire Marshal and a resident of this community, I have firsthand familiarity with the local road network. In my professional opinion, the existing road system presents significant challenges for emergency access and large-scale evacuation during a major wildfire event.

The wildfire analysis also relies on future compliance with road standards, defensible space requirements, and installation of a 5,000-gallon fire water tank. While these measures may be beneficial, they do not by themselves demonstrate that wildfire impacts have been fully analyzed or reduced to a less-than-significant level.

Several questions remain unanswered:

- Has a project-specific evacuation analysis been conducted?

- Has the cumulative evacuation demand from nearby residences, retreat centers, agricultural operations, and proposed cannabis projects been evaluated?
- What evidence supports the conclusion that emergency access will remain adequate during a significant wildfire event?
- What wildfire prevention training, emergency response procedures, or operational fire safety programs will be required for the project?
- Where is the evidence of fire suppression equipment, procedure, training, and personal protective equipment for employees?
- What analysis demonstrates that the proposed fire protection measures are sufficient for the project and its location?

My concern is not directed toward cannabis cultivation itself. Rather, it is whether the environmental record contains substantial evidence supporting the required findings regarding wildfire risk, evacuation, emergency response, and public safety.

I respectfully request that the Planning Commission carefully evaluate whether the wildfire analysis provides sufficient evidence to support the conclusion that wildfire impacts are less than significant.

Thank you for your consideration.

Respectfully submitted,

Duncan Gamlen

Fire Marshal

Mountain of Attention Sanctuary of the Holy Domains of Adidam