



**COUNTY OF LAKE**  
**COMMUNITY DEVELOPMENT DEPARTMENT**  
**Planning Division**  
Courthouse - 255 N. Forbes Street  
Lakeport, California 95453  
Telephone 707/263-2221 FAX 707/263-2225

**July 31, 2025**

## **SUPPLEMENTAL STAFF REPORT**

**TO:** Planning Commission

**FROM:** Mireya G. Turner, Director  
Laura Hall, Senior Planner

**DATE:** July 31, 2025

**SUBJECT:** Consideration of PL-25-112: EIR 24-01, DA 24-01, AM 24-01, GPAP 24-01, GPAP 24-02, RZ 24-01, GPD 24-01, UP 24-05, RZ 24-02, UP 24-08 , for the Guenoc Valley Mixed Use Planned Development Project at the following locations: 22671, 22901, 23534, 23573, 24221, 24566, 24783, 25111 Grange Rd; 22500, 23597, 24563, 26753 Jerusalem Grade Rd; 22900, 23510, 25470, 23450 Guenoc Valley Road; 23790, 23120, 24245, 24355, 24385, 24425, 24275, 24683, 24733 Bohn Valley Rd; 19506, 19862, 21323, 21423, 21423, 21523, 21665, 22000, 22110, 22725, 22880, 23150, 23351, 23250, 23350, 23375, 23400, 23650, 24150, 24305, 24350, 24090 Butts Canyon Road; 23501 Oat Hill Road; 21000 Santa Clara Road; and 20740, 20830 State Highway 29 (APNs: 013-015-59 & 60; 013-016-04, 06, 08, 10, 12, 13, 15, 16, 17, 18 & 19; 013-019-22, 23, 24 & 25; 013-021-05, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25 & 26; 013-022-08, 09, 10, 11, 12, 13, 16, 17, 18, 19, 20, 21, 22, 23 & 24; 013-023-06, 09, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 22, 23, 24 & 25; 013-024-29, 30, 31, 33, 34, 35, 36, 37, 38, 39 & 40; 013-053-01; 014-004-25; 014-310-07 & 09; 014-320-08 & 10; 014-330-09; 014-340-04, and 014-380-09). Applicant: Lotusland Investment Holdings, Inc.

**EXHIBITS:**

1. Conditions of Approval
2. Mitigation Monitoring and Reporting Program
3. Findings of Fact and Statement of Overriding Considerations
4. Response to Attorney General Comments

This Supplemental Staff Report presents minor modifications to the Conditions of Approval (Exhibit 1) and clarifications to the Mitigation Monitoring and Reporting Program (MMRP; Exhibit 2) and Findings of Fact and Statement of Overriding Considerations (Exhibit 3), previously submitted to the Planning Commission as attachments to the July 24, 2025 Staff Report. These clarifications were made in response to comments raised in the July 25, 2025 letter from the State of California Office of the Attorney General to Lotusland Investment Holdings, Inc. (Applicant) regarding the Guenoc Valley Mixed Use Development Project (Proposed Project) Partially Revised Environmental Impact Report (PREIR), and updated dates as necessary to reflect potential adoption by the Planning Commission on August 8, 2025. While the Attorney General's letter was addressed to the

Applicant and not the County, and CEQA does not require written responses to comments received outside of the public circulation period, Exhibit 4 is intended to clarify how the issues raised in the letter from the Attorney General have already been addressed within the EIR and associated technical appendices, and to describe what clarifications have been made in the revised MMRP and COAs in response to the requests in the letter. These comments and responses are summarized briefly below.

1) Project Modifications to Reduce Wildfire Risk and GHG Impacts

*Response: The County has prepared a revised MMRP with minor changes that clarify that the Settlement Agreement terms that the Project Applicant voluntarily agreed to are a binding and enforceable part of the MMRP. All Settlement Agreement terms requiring updates to the Specific Plan of Development (SPD) and Wildfire Prevention Plan (WPP) were incorporated into the SPD and WPP as analyzed in the PREIR.*

2) Insufficient Analysis of Potential Wildfire Scenarios

*Response: The comment noted that the Community Evacuation Analysis (Appendix H-1 of the Draft PREIR) included analysis of only the north-south and south-north wildfire scenarios, and requested analysis of west-east and east-west fire scenarios. This analysis was presented in Appendix H-3 of the March 2025 Draft PREIR.*

3) Unsubstantiated Standards of Significance and Resulting Findings

*Response: The County adopted the CEQA Appendix G qualitative significance thresholds to assess community evacuation impacts, although the comment requested that a quantitative significance threshold be used instead. Timeframes for evacuating people vary by site specifics, population, road capacities and other factors, and there is no one numerical time threshold that would be appropriate to apply to all locations. As such, the County assessed numerous factors using a qualitative approach, supported by quantitative analyses where appropriate.*

4) Inadequate Mitigation Measures

*Response: Operation of the Project could result in a potentially significant impact to community evacuation, when visitors, residents, and employees would be present on the site. Mitigation Measures 3.16-3 through 3.16-6 would be implemented before the first certificate of occupancy is issued for the Project, which is when the impact would occur.*

5) Inadequate Consideration of Emergency Access as it Related to Community Evacuation

*Response: The comment requested additional analysis of emergency access be added to the Community Evacuation Analysis (Appendix H-1), which was expanded upon in the Wildfire Risk Analysis included as Appendix H-3 to the March 2025 Draft PREIR and within Impact 3.16-1 and Impact 3.16-5 of the March 2025 Draft PREIR.*

6) DPREIR Misstates Timing and Implementation of Settlement Agreement Mitigation Measures

*Response: Several of the inconsistencies in timing for implementation of the Settlement Agreement measures identified in this comment had already been*

*corrected in the MMRP that was presented to the Planning Commission on July 24, 2025. Several additional clarifications were made to ensure that the Settlement Agreement terms are completed at the correct time in relation to Project implementation.*

In summary, none of the issues raised in the Attorney General's letter warrant changes to the information and analysis within the EIR, however certain minor clarifications to the timing and implementation of measures agreed to by the Applicant through the Settlement Agreement have been made in the revised MMRP and COAs. The information in Exhibit 3 does not constitute new information requiring revisions to or recirculation of the Draft PREIR or Final PREIR.