

06/10/2026

To Whom It May Concern,

Following the planning commission meeting that was held on April 23, 2026, we were able to coordinate a meeting with the owners of Lake CoCo Farms. Juan Gamino, Robert Estrada, their project manager Trey Sherrell, my wife and myself attended.

We felt the meeting was very productive, they listened to our concerns, answered all of our questions and did their best to try and offer solutions. The conversation of cattle also came up in the conversation, which Juan and Robert gave a verbal suggestion of us grazing our cattle on the hills above their project, which would help them with wildland fire mitigation and help us with feeding throughout the year. We have since both signed a lease to graze on their property. This shows us their commitment to being good neighbors.

While we still have concerns over increased traffic, smell and the unknown safety concerns that are related to the cannabis industry, we feel that Juan and Robert will be good neighbors and do their best to work with us.

They also assured us that the issues we had with dangerous dogs in the past would not be a concern and were willing to offer solutions to try and mitigate our previously stated concerns. Regarding the traffic, they suggested extending the encroachment off of Hendricks Rd to reduce dust and possibly finding a solution to help deaden sound and increase privacy along the front fence line.

If this was a perfect world, things would continue as they have been with no large cannabis grow behind our property. However, we recognize that cannabis cultivation is emerging as a new trend in local agriculture and we wish to maintain a good relationship with our neighbors.

At this time, we have changed our stance and are in support of the project with Lake CoCo farms and hope we continue to have a positive relationship moving forward.

Sincerely,  
Spencer and Danielle Johnson  
3481 Hendricks Rd  
Lakeport, Ca 95453

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## Lake County

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

Meeting Time: June 11, 2026 at 9:00am PDT

### Agenda Item

**6d 26-06139:50 AM - Consideration of proposed Major Use Permit PL-25-155 (UP 20-58), Lake Coco Farms/ Juan Gamino, and Mitigated Negative Declaration PL-25-155 (IS 20-72), for the approval of no more than 205,800 square feet (sf) of commercial cannabis cultivation and a Type 13 Distribution, self-transport license located at 3417 and 3547 Hendricks Road, Lakeport (APNs 005-006-07 and 005-013-01).**

[Legislation Text](#) [Final Staff Report](#) [Site Plans](#) [Conditions of Approval](#) [Property Management Plan](#) [Draft Initial Study](#) [Hydrology Report](#) and [Drought Management Plan](#) [Biological Resource Assessment](#) [Agency Comments](#) [Attachment 8 - Public Comment](#)

If you are a human, ignore this field

Select a Position:  Oppose  Neutral  Support

10000 of 10000 characters remaining

5 Public Comments

## Support

As a 100% service connected disabled veteran that relies on medical cannabis for an improved quality of life, I support any and all new cannabis farms, manufacturers, dispensaries, cafes and more. We need more cannabis farms not less.



[Margaux Kambara](#) at June 11, 2026 at 4:03am PDT  
Oppose

Dear Chair Zoller and Planning Commissioners,

I oppose this permit application until the issues identified are resolved. Because my public comment exceeds Granicus' character limit, I will send my public comment and its attachments to each Planning Commissioner.

I would appreciate Community Development Dept.'s assistance to add my public comment to the public record. My earlier written public comment submitted for this project's first hearing (March 2026) was not included among public comments for the second hearing date.

Thank you for your consideration.

Respectfully,

Margaux Kambara  
Lake County Resident



[Michael Green](#) at June 10, 2026 at 7:21pm PDT  
Neutral

Attachment 5 for this item is a hydrology report. As noted in its introduction, "This report has been prepared to comply with the County of Lake Ordinance 3106, 'AN URGENCY ORDINANCE REQUIRING LAND USE APPLICANTS TO PROVIDE ENHANCED WATER ANALYSIS DURING A DECLARED DROUGHT EMERGENCY' approved by the Lake County Board of Supervisors on July 7, 2021." The hydrology report was not expressly required by the cannabis zoning regulations and standards then in place.

As point of information, the Board of Supervisors terminated its declared emergency for local drought conditions on April 2, 2024, more than two years ago. On April 23, 2024, the board rescinded urgency Ordinance 3106. Thus, the hydrology report as presented with the permit application is not necessarily on point regarding current concerns and regulations regarding water supply and management. Nor is the report required to comply with the stated requirements of the commercial cannabis ordinance as it exists today.

The 2021 report is useful in disclosing a shallow-draft well located within approximately 250 feet of Hendricks Creek and a new, deeper well located approximately 600 feet from Hendricks Road. On December 6, 2023, the State Water Board adopted the Emergency Information Order Regulations for the Clear Lake Watershed. The information collected under these regulations in 2024, primarily in Big Valley and along larger hitch-bearing creeks, will inform the Board's ongoing evaluation of how groundwater pumping and other water uses may influence creek flows that are critical for hitch spawning and migration. The State Water Board's information order makes clear that information related to diversion, extraction, or use of water relevant to the Board's Clear Lake hitch protection efforts is needed upstream of hitch spawning habitat that may have substantial surface water diversions; and/or in areas where groundwater may be connected to key hitch spawning habitat. Such information is equally important to advance the county's hitch protection efforts.

On June 2, 2026, the Board of Supervisors considered and approved the continuation of a proclamation declaring a Clear Lake Hitch emergency, but it did not subsequently pass an ordinance expressly directing the Community Development Department to consider potential impacts of cannabis cultivation projects located near hitch spawning habitat. To the extent the issue is raised in the initial study and final staff report, hitch protection is offered by applying standard setbacks from Hendricks Creek and by requiring mitigation measures designed to reduce stormwater and other water discharges into the creek from the proposed cultivation sites. The potential impacts of well operations on creek flows were not analyzed in the 2021 hydrology report, but the State Water Board's emergency regulations coupled with the continuing BOS hitch proclamation have raised awareness and expectations greatly since then.

At minimum, a project condition of approval should be added to prohibit usage of the shallow-draft well closest to Hendricks Creek for any commercial cannabis activities. Your commission also may wish to consider whether the 2021 hydrology report, being focused primarily on drought issues, adequately considered the potential impacts of well operations on Clear Lake Hitch habitat adjacent to the cultivation site. It is well within your Commission's discretion to request further information before acting on the subject application.

**Jared Hendricks  
Hendricks Ranch  
P.O. 574  
Lakeport, CA 95453**

**June 5, 2025**

**Trish Turner  
Community Development Dept.  
Planning Division  
255 N. Forbes St.  
Lakeport, CA 95453**

**RE : Lake Coco Farms Project  
Use Permit PL-25-155/UP 20-58  
3417 and 3547 Hendricks Road, Lakeport**

**Mrs. Turner,**

**I am writing this as a follow-up for my letter of concerns to you of December 4, 2025, about this project.**

Since December I have had multiple meetings with Juan Gamino and Roberto Estrada, the owners of the land of this project, their consultant Trey Sherrell, and the neighbors surrounding this project site. My goals for doing so were:

- To gather more information about possible negative impacts of this project.
- To determine if there were practical, specific ways such impacts could be remediated.
- To determine levels of ecological perceptivity and sensitivity by the project owners/applicants.
- To determine the owners/applicant's motivational levels to adhere to the permitting requirements, and to remediate neighborhood concerns.

I have found the owners/applicants very good to work with. They exhibit good sensitivity to ecological issues, a strong desire to have good relationship with neighbors, and a strong commitment to remediate any negative impacts that could come up. It seems a very good indication of positive land stewardship capacity, and intelligent business practices.

Because groundwater reservoirs are complex, and currently affected differently every year by precipitation timings, it is definitely an unknown, as to whether this project's irrigation usage will negatively affect the community well on 3207 Hendricks Road. The

project's applicants/owners have reassured me that if their well usage (from their well which is deeper than our community well) significantly impacts the community well, they will supply the community well users with water, probably from running a line from their system into the community's system. They have indicated for a backup solution they would be willing truck potable water to community water storage tanks near 3207 Hendricks Road. Well levels and spring outputs, in Hendricks Canyon are up this year, so hopefully there won't be any need for such.

My very important concerns about possible ag chemical inputs into Hendricks Creek, have been significantly relieved. It is a pristine watershed creek, and a very significant spawning stream for the hitch and other fish. The county has apparently increased the required set-backs for activities near the creek, since the original application. The applicant/owners have repaired the culvert and drainage ditch on the south side of the fields, which was overflowing out into the proposed growing fields, and could have carried ag chemicals into the creek.

The entrance road to the project, off of Hendricks Road, has been repaired by the applicants/owners. It is my understanding that the County is requiring significant upgrades to that road also. It has been suggested by neighbors, that the applicants/owners should install one or more speed bumps at the beginning of the entrance road, with low speed requirement signs. The main concern by neighbors doesn't seem to be with Coco Farms employees, nearly as much as with operators of delivery trucks and other outside vehicles.

I have not seen any loose guard type dogs, that would create safety issues, from Coco Farms, since I voiced concerns about that.

That is the current status of my specific concerns and issues around this project. I think the project can be a viable and appropriate project, if the County can maintain the appropriate monitoring levels during its operation.



Jared Hendricks

# Article 2 Ingress and Egress

## § 1273.00. Intent

Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

## § 1273.01. Width.

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article, or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.

(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.

(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6").



10 foot wide Driveway



12 foot wide one way Road



20 foot wide two lane Road



LII > State Regulations > California Code of Regulations > Title 14 - Natural Resources  
> Division 1.5 - Department of Forestry and Fire Protection > Chapter 7 - Fire Protection  
> Subchapter 2 - State Minimum Fire Safe Regulations > Article 1 - Administration  
> **Cal. Code Regs. Tit. 14, § 1270.03 - Scope**

# Cal. Code Regs. Tit. 14, § 1270.03 - Scope

State Regulations    Compare

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(a) Subchapter 2 shall apply to:

(1) the perimeters and access to all residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991, and those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b).

(2) the siting of newly installed commercial modulars, manufactured homes, mobilehomes, and factory-built housing, as defined in Health and Safety Code sections 18001.8, 18007, 18008, and 19971;

(3) all tentative and parcel maps or other Developments approved after January 1, 1991; and

(4) applications for Building permits on a parcel approved in a pre-1991 parcel or tentative map to the extent that conditions relating to the perimeters and access to the Buildings were not imposed as part of the approval of the parcel or tentative map.

(b) Subchapter 2 does not apply where an application for a Building permit is filed after January 1, 1991 for Building construction on a parcel that was formed from a parcel map or tentative map (if the final map for the tentative map is approved within the time prescribed by the local ordinance) approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991.

(c) Affected activities include, but are not limited to:

(1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);

(2) application for a Building permit for new construction not relating to an existing Structure;

(3) application for a use permit:

(4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

(d) The standards in Subchapter 2 applicable to Roads shall not apply to Roads used solely for Agriculture; mining; or the management of timberland or harvesting of forest products.

## Notes

Cal. Code Regs. Tit. 14, § 1270.03

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section and NOTE filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Change without regulatory effect amending subsection (a) filed 2-1-2021 pursuant to section [100](#), title 1, California Code of Regulations (Register 2021, No. 6).

5. Renumbering of former section 1270.03 to section [1270.04](#) and new section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

Note: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section and Note filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

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[MAILE FIELD](#) 4 months ago

Date: June 12, 2025

To: The Honorable Lake County Planning Commission

From: Peggie King, Environmental Professional, Kelseyville

Subject: Consideration of Summary of Cannabis Policy Recommendations and Request for Planning Commission Recommendation(s)

I have worked in the environmental field for about 30 years. Partly as a Lake County employee (12+years) and in the private sector for a few large corporations. Most of my work has been in California, where I specialize in understanding and advising on complex environmental regulations with an emphasis on water resources. I worked in cannabis for a former grower and processor in Lake County for about 8 months and am familiar with the business and environmental issues.

I would like the Planning Commission and subsequently the Board of Supervisors to consider including the following bullet points in the subject discussion item, if possible, to address a few environmental concerns related to water resources.

Below is a very brief list of concerns:

Be aware of the Sustainable Groundwater Management Act (SGMA) and potential future consequences of overdraft in groundwater basins that are not presently on the high priority list, yet could be in the future if the water resources are not carefully considered and managed. SGMA requires local agencies to address undesirable impacts of over pumping to bring groundwater basins into balance. The Big Valley Groundwater Basin is currently the only basin that is regulated by SGMA and maybe it is very costly to the county and citizens.

The county policies/ordinance should address the current required Hydrology Reports to be consistent and include a minimum amount of information, perhaps a report template could be provided to the project proponent. The Hydrology Reports need to be accurate, clear, concise and fact based. Stating that a cannabis plant uses as much water as a tomato plant is vague and does not quantify the use based on factual evidence, as it should, in order to demonstrate sustainability. Groundwater well pump times should be conducted for 24 consecutive hours to accurately reflect the drawdown and recovery of the well. In some areas, well production is very low (e.g., 10 gpm) and that may necessitate around the clock watering for a commercial grow.

Groundwater wells close to creeks/streams could be considered under the influence of surface water. Surface water includes all groundwater sources that are deemed to be under the influence of surface water such as springs,

shallow wells, and wells close to rivers. This condition needs to be better

understood with regards to water rights and regulated waterways such as Putah Creek and particularly with regards to groundwater recharge. In California, groundwater wells that are influenced by surface water may require a water right from the State Water Resources Control Board depending on the specific circumstances and well location. This is a complex issue that does not appear to be well understood within the Hydrology Reports that I have read associated with proposed cannabis projects.

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26 March 2026

Chair Zoller and Commissioners,

The Lake Coco Farms permit application, Major Use Permit PL-25-155 (UP 20-58) and Mitigated Negative Declaration (MND) PL-25-155 (IS 20-72), meets California Environmental Quality Act's (CEQA) "fair argument" standard that triggers an Environmental Impact Report (EIR).

### **I. Environmental Impact Report (EIR) required**

Community Development Dept. (CDD), as the Lead Agency, may prepare an MND (Mitigated Negative Declaration) when an initial study shows "that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment"<sup>1</sup>, but when a "fair argument" can be made that a project may have a significant effect on the environment, an EIR must be prepared, even if evidence to the contrary exists.<sup>2</sup>

"The fair argument standard is a 'low threshold' test for requiring the preparation of an EIR. It is a question of law, not fact, whether a fair argument exists, and the courts owe no deference to the lead agency's determination." <sup>3</sup>

Here, the "fair argument" standard is likely met. The Project will result in numerous significant environmental effects that have gone unidentified and unanalyzed in the MND, as outlined in Jared Hendricks' public comment dated 4 Dec 2025 and submitted for this hearing:

1. Probable impact on neighbor's domestic water supplies
2. Potential impacts on migratory fish (Clear Lake hitch, California threatened species; candidate for Endangered Species Act protection) in Hendricks Creek
3. Flooding issues in the west field grow area (its stormwater runoff and pollution potential are unaddressed) with drainage into Hendricks Creek
4. High levels of cannabis odor for neighbors

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<sup>1</sup> CEQA Guidelines, § 15070, subd. (a)

<sup>2</sup> See, e.g., *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 957; *No Oil, Inc. v. Los Angeles* (1974) 13 Cal.3d 68, 75.

<sup>3</sup> *Protect Niles*, *supra*, 25 Cal.App.5th at 1139, internal quotations omitted; see also *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1318; *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576; *Georgetown Preservation Society v. County of El Dorado* (2018) 30 Cal.App.5th 358, 370; *Governor's Office Planning and Research* (2004), *CEQA Technical Advice Series on Mitigated Negative Declarations*, § II, available at [https://lci.ca.gov/docs/MND\\_Publication\\_2004.pdf](https://lci.ca.gov/docs/MND_Publication_2004.pdf).

5. Road degradation and accommodating emergency wildfire equipment<sup>4</sup>
6. (Current) Septic system compliance with setback to watercourse
7. Violation of setback from watercourses for potting mix (with possible ag chemicals)

Even if contrary evidence arises, under the “fair argument” test, when “such evidence [supporting a fair argument] is found, it cannot be overcome by substantial evidence to the contrary.”<sup>5</sup> Essentially, once the “fair argument” standard is met, the MND cannot be cured.

Please recall that Mr. Hendricks is a professional land manager and ecologist with decades of experience managing lands in the Hendricks Creek Watershed. As a descendant of one of pioneering families settling in Scotts Valley in 1859, Mr. Hendricks has deep ties to the Hendricks Creek Watershed and may be the foremost living expert on the watershed’s wildlife, water resources, general ecology and fire ecology.

CDD as CEQA Lead Agency must provide “feasible mitigation measures” and/or “feasible alternatives” to “substantially lessen the significant environmental effects of such projects”<sup>6</sup>, even if the impact remains significant after implementation<sup>7</sup>

All mitigation must be timely (not deferred), fully enforceable through a legally binding instrument, and include clear performance standards for what any future mitigation must achieve.<sup>8</sup> As to Project alternatives, several exist, such as alternative locations, configurations, or reduced size, that could reduce significant environmental impacts and which the County must analyze.

**CEQA requires** substantial evidence of a project’s **long-term, reliable water supply**.<sup>9</sup> The analysis must quantify storage, conduct drawdown/production testing, and demonstrate adequacy in dry and multiple-dry years—not just in average conditions.

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<sup>4</sup> *Lake County 2025 State and County Minimum Fire Safe Guide (PRC 4290)*. Road degradation calls into question whether the road can accommodate emergency fire equipment.

<sup>5</sup> *San Bernardino Valley Audubon Soc’y v. Metro. Water Dist.* (1999) 71 Cal.App.4th 382, 389; see also *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1399-1400; *Citizens’ Com. to Save Our Village v. City of Claremont* (1995) 37 Cal.App.4th 1157, 1167-1169.

<sup>6</sup> Pub. Res. Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(1), 15126.6, subd. (a)

<sup>7</sup> See, e.g., *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 523 [California Supreme Court holding that “[m]itigation measures ... must be at least partially effective, even if they cannot mitigate significant impacts to less than significant levels”].

<sup>8</sup> CEQA Guidelines, § 15126.4, subd. (a).

<sup>9</sup> *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412 (long-term, reliable water supply standard; dry and multiple-dry-year analysis).

For water availability analysis, the application includes a well test from 2020 conducted in April not the summer, when Project’s water demand would be greatest. CDD Director Turner stated at the General Plan Advisory Committee meeting (20 Mar 2026) that tests and studies required for cannabis permit applications should be no older than five years old (to reflect current conditions.) The Project well test does not meet the recommendations for water availability analysis submitted to the Planning Commission by Kelseyville-based environmental professional Peggie King<sup>10</sup>: *“Groundwater well pump times should be conducted for 24 consecutive hours to accurately reflect the drawdown and recovery of the well.”*

CEQA also distinguishes between water storage and water availability; they are not the same.

## **II. CAL FIRE Letter to CDD: delayed implementation of requirements not allowed**

The Applicant plans to implement fire safe road requirements when the proposed processing building is constructed. A date or timeline for that construction is not provided. CAL FIRE clearly stated in its letter to a CDD Resource Planner that delayed compliance to minimum fire safe requirements (Public Resource Code 4290) is not allowed; see attached.

CDD erred in its interpretation of Lake County 2025 California and County Minimum Fire Safe Regulations Guide. CDD suggested that PRC 4290 scope is limited to the Applicant’s property. This is incorrect, as Planning Commissioners may recall when CAL FIRE Assistant Chief Mike Wink, Sonoma Lake Napa unit, presented the Lake County 2025 California and County Minimum Fire Safe Regulations Guide<sup>11</sup> at the commission’s 26 June 2025 meeting. The minimum safe fire road requirements apply to ALL roads (public and private) with few exceptions.<sup>12</sup>

## **III. Project application is incomplete and its study of environmental impact is incomplete**

The Project references ADA toilets in a proposed processing building and required septic system approval from Lake County Environmental Health. But the site plans do not identify the proposed septic field. A septic field is not optional for a processing building.

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<sup>10</sup> See attached 11 LC Hydrology Rpt Recommendations for LC Cannabis Permit Applications

<sup>11</sup> Link to guide: <https://countyoflake.legistar.com/LegislationDetail.aspx?ID=7444712&GUID=72E1E944-48FD-4518-8CFE-6F85B70F3FEB>

<sup>12</sup> See attachments LC 2025 CA & County Min Fire Safe Regs Guide Rds p8 and 4290 Exemption\_Cal Code Regs . Tit. 14 1270.03 – Scope | State Regulations | US Law |LII / Legal Information Institute.pdf

The location of the processing facility is not clear. The site plans use the same letter (P) for proposed and existing features; this is confusing.

The site plans do not show the location of current septic field, which may not meet the setback requirement from a watercourse. If so, corrective action is required and needs to be described as part of the Project. Lake County Environmental Health has required an onsite septic system to be repaired or decommissioned and reconstructed for domestic or cannabis activities. A damaged septic system is a nuisance under Lake County Code<sup>13</sup>. Septic repair and removal requirements are typically imposed under California Health & Safety Code and California Water Code authority to prevent public health hazards.

The full environmental impact of the Project cannot be determined if the impact of the complete project is not studied.

**Conclusion: recurring themes, problems—water availability, road safety and cannabis odor**

This Project’s permit application surfaces recurring themes and problems seen by the Planning Commission: water availability, road safety and cannabis odor. CEQA does not care who mitigates the impact. The impact and potential impact must be mitigated effectively if a discretionary use permit is approved with an MND. To disregard the impacts and potential impacts because mitigation may fall seemingly unfairly on the applicant is not allowed by CEQA. Again, CEQA requires effective mitigation; CEQA does not care who performs the mitigation.

Approval of the Project permit application includes construction of the processing facility and its ADA toilets, yet this application is not complete and its environmental impacts have not been studied adequately. It is premature to approve the Project’s permit application when it has not obtained approval for the new septic field. Consider the situation of the Project receiving permit approval but cannot find a suitable septic field site. A processing facility cannot operate without indoor toilets.

Thank you for your consideration.

Respectfully,

Margaux Kambara  
Lake County Resident

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<sup>13</sup> Lake County Code Chapter 9, Article 1. CA Water Code §13050 (m) (“discharge of waste that causes pollution”