

Exhibit 5-A — Procedural Violations Summary Box

Poverty Flats Ranch UP 23-09 / IS 23-20 (Project No. PL 25-198)
Chapter 5 — Procedural and Administrative Compliance Violations
(Sorted by jurisdictional severity — Federal → State → County/Local)

Federal / Cross-Jurisdictional Violations

Citation	Brief Description
NEPA (42 U.S.C. § 4332)	Environmental review required for actions affecting federal lands not conducted.
FLPMA (43 U.S.C. § 1761 et seq.)	Federal right-of-way authorization required for commercial transport across BLM land.
18 U.S.C. § 1001	False statements or material omissions made in official records or hearings.

State Law / CEQA / Professional Compliance

Citation	Brief Description
CEQA Guidelines § 15125(a)	Project description and environmental setting incomplete or inaccurate.
CEQA Guidelines § 15088(b)	Failure to respond in good faith to public and agency comments prior to approval.
CEQA Guidelines § 15073.5	Substantial ISMND changes required recirculation that was not performed.
CEQA Guidelines § 15090(a)(2)	Findings and responses omitted from the official record of decision.
Bus. & Prof. Code § 5536	Project plans lacked licensed architect/engineer stamp and signature.
Bus. & Prof. Code § 6735	Engineering documents not signed and sealed by responsible licensee.
PRC § 4290 / 14 CCR § 1273.01	Road access and turnouts fail to meet fire-safe emergency-vehicle standards.

PRC § 4291

Defensible-space and vegetation-management provisions not satisfied.

County / Local Procedural Violations

Citation	Brief Description
Lake County Code Ch. 30 (Grading Ordinance)	Complex grading permit required for > 50 cu. yds.; unpermitted grading conducted.
Lake County Code Ch. 21 (Zoning – Use Permits)	Major Use Permit approved without complete and accurate environmental record.
Lake County Code Ch. 13 (Fire Safety Standards)	Local fire-access and construction standards not verified through inspection.
Gov. Code § 6253(c)	Failure to produce public records or maintain PRA log violates transparency law.
County Administrative Procedures Manual § 2.5	Staff reports lacked required attachments and evidence provided to Commission.

Summary Note: This exhibit consolidates all procedural and administrative violations identified in Chapter 5, aligning each citation to its governing authority. The violations demonstrate systemic non-compliance across federal, state, and county levels, forming the procedural foundation for Appellant’s CEQA-based Appeal No. PL 25-198.