

From: Margaux Kambara Tom Lajcik <Thrive95453@outlook.com>

Sent: Wednesday, July 16, 2025 11:25 AM

To: Lake County CDD - GuenocValleyComments <guenocvalleycomments@lakecountyca.gov>; Laura Hall <Laura.Hall@lakecountyca.gov>

Subject: [EXTERNAL] Re: Guenoc Valley Mixed-Use Planned Development Project – Public Comment, Partially Revised Environmental Impact Report (PREIR) (EIR 24-01)

Hello, Ms. Hall,

Will there be a response to the comments and concerns raised in LakeCAP's public comment on the PREIR before the Planning Commission meeting on 24 July? It is my understanding that there is a written response to EIR public comments.

Thank you for your assistance.

Margaux Kambara
LakeCAP Founding Member

From: Thomas Lajcik <Thrive95453@outlook.com>

Date: Friday, May 2, 2025 at 4:46 PM

To: guenocvalleycomments@lakecountyca.gov <guenocvalleycomments@lakecountyca.gov>

Subject: Guenoc Valley Mixed-Use Planned Development Project – Public Comment, Partially Revised Environmental Impact Report (PREIR) (EIR 24-01)

Hello, Ms. Hall,

Attached please find public comment from LakeCAP on this subject. We appreciate the opportunity to provide input on the Guenoc Valley project.

Thank you for your consideration.

Sincerely,

Margaux Kambara
LakeCAP Founding Member

May 2, 2025



County of Lake
Community Development Department
255 N. Forbes Street
Lakeport, CA 95453

Attn: Senior Planner Laura Hall

Submitted via email: guenocvalleycomments@lakecountyca.gov

Subject: Guenoc Valley Mixed-Use Planned Development Project – Public Comment, Partially Revised Environmental Impact Report (PREIR) (EIR 24-01)

Dear Ms. Hall,

LakeCAP, a local grassroots community group, offers community members an organized voice in important policy matters impacting the economy, environment, and quality of life in Lake County. As the Lake County 2050 General Plan Update is a LakeCAP priority, LakeCAP submits this letter expressing concerns about the Partially Revised Environmental Impact Report (PREIR) for the Guenoc Valley Mixed Use Planned Development Project, hereafter noted as project.

LakeCAP Aligned With Community Groups on Guenoc Valley District PREIR

LakeCAP shares the sentiment expressed by Lake County residents, Middletown Area residents, Lake County General Plan Advisory Committee (GPAC) and the Scotts Valley Community Advisory Council.

- In a county-wide survey for the General Plan update, Lake County residents identified the county's rural and agricultural nature with its small-town charm as key appealing traits.
- At the hearing¹ for this project, Middletown Area residents shared their concerns with Lake County Planning Commissioners about the project's impact on housing density and detracting from the county's bucolic and small-town feel; increased fire risk; adequacy of water supply; adequacy of current roads for egress and ingress during wildfire.
- GPAC's Statement of Values for the 2050 General Plan includes support for sustainable agriculture and preserving the rural nature and small-town charm of the county.
- At its March 2025 meeting, GPAC agreed to recommend to the Lake County Board of Supervisors that the county preserve land in the county for agricultural purposes
- In a letter to Board of Supervisors and Community Development Director Mireya Turner (dated 17 March 2025), the Scotts Valley Community Advisory Council voiced support for preserving agricultural lands and resisting development pressure to rezone agricultural lands and expand Community Growth Boundaries into lands zoned or suitable for agricultural purposes

When many county residents face food insecurity and Lake County per capita income in the past 12 months (in 2023 dollars) for the period 2019-2023 is \$34,768², Lake County leaders should weigh the decision to remove land from

¹ Lake County Planning Commission meeting minutes, June 17, 2020, p. 4-7.

² US Census, census.gov, 2024.

agricultural production very seriously. The project's rezoning agricultural lands, especially prime agricultural lands, to Commercial Resort to form Guenoc Valley District is especially troubling. Consider that the planned equestrian center will take 57 acres of prime and unique agriculture out of production.³ Once agricultural lands are removed from production or are rezoned, it is almost impossible to resume agricultural operations on those lands.

Specifically, the PREIR for this project notes that *"While Mitigation Measure 3.2-2 would reduce the level of impact, there would still be a net loss of Important Farmland as a result of Phase 1 of the Proposed Project, and the impact was identified as significant and unavoidable in the 2020 EIR."* (PREIR, PDF p. 138) The declaration that the project impact is "unavoidable" appears to be based in opinion and not fact.

The mitigation measure to preserve agricultural lands is not clear; the map for the proposed swapped or replacement acres is not apparent. *"Mitigation Measure 3.2-2 requires acre for acre long-term permanent protection of farmland of equivalent quality, so every acre of Prime and Unique Farmland converted would result in the same number of acres of Important Farmland preserved elsewhere on the property or in the vicinity."* (PREIR, PDF p. 136)

Where are the swapped or replacement acres for the agricultural lands repurposed for the project? And are the replacement acres truly suited for agriculture with adequate water supply? Middletown Area Plan observes that availability of quality water limits agricultural activity in the area.⁴ The Middletown Area Plan also states, *"Other factors such as the existence of alkali soils in the area south of Grange Road in the Coyote Valley and serpentine soils in the area's eastern portions present localized limitations to agriculture."*⁵

"... the Agricultural Preserve Combining District would be reduced by approximately 90 acres to accommodate the Parcel Reconfiguration. Nevertheless, the overall size of the Agricultural Preserve Combining District would be 1,653 acres under the Project Modifications, which is roughly 556 acres more than the area of currently zoned agricultural land within the overall Guenoc Valley Site." (PREIR, PDF p. 142)

Despite the project's designed increase in agricultural lands by exchange, smart development is in question for the newly formed Guenoc Valley District (GVD). Lands formerly designated as agricultural are now among GVD's 16,000 acres of land now designated as Commercial Resort. Development constraints on agricultural lands no longer apply to GVD. With a blank canvas of Commercial Resort, development sprawl and density can easily spread throughout GVD. This would undermine the priority of Lake County residents to preserve the county's rural and agricultural nature.

The Middletown Area Plan's recognition for the need for open spaces challenges piecemeal development and sprawl: *"...there is pressure to subdivide agricultural lands. Large ranches are of great value. They provide:*

- *areas for aquifer recharge*
- *scenic vistas*
- *open space and the feeling of wilderness*
- *significant wildlife habitat,*
- *recreational opportunities in some limited cases"*⁶

Continuing, the Middletown Area Plan advises, *"Lands capable of agricultural production should be preserved with the minimum parcel size limited to existing parcels or, if allowed to be subdivided, no less than 20 acres in size. Adjacent rural lands that can not (sic) be developed with economically viable agricultural uses should be maintained as buffers to the more intensive agriculturally productive lands. Efforts to preserve productive agricultural lands include tax incentives"*⁷ ... Clearly, the Middletown Area Plan supports preservation of agricultural lands and buffers for agricultural activity.

LakeCAP and others realize that wildfire risk can be reduced by utilizing buffers and open space. Among solutions for open space are land trusts and zoning land for resource conservation. LakeCAP urges the exploration of these potential solutions.

Grange Road Connector - Concerns

The loss of agricultural land to construct the Grange Road Connector is characterized in land use conflict terms; the impact of the removal of agricultural land from production is not addressed. The impact information equivalent of an Initial Study for the Grange Road Connector does not seem to be available. Since the Grange Road Connector is

³ Partially Revised Environmental Impact Report (PREIR) March 2025, hereafter PREIR, Figure 4-4, PDF p. 137.

⁴ Middletown Area Plan (approved 2010), p. 3-33.

⁵ Ibid.

⁶ Middletown Area Plan, p. 3-35.

⁷ Ibid.

proposed as a solution to shortcomings identified in the draft Environmental Impact Report (EIR), information on environmental impacts to the Grange Road Connector area is of great interest. The proposed road will involve *"approximately 2.2 miles (8 acres of disturbance)... Approximately 25,000 cubic yards of cut and 23,250 cubic yards of fill are estimated to be generated."*⁸

The PREIR references rock outcrops and blue oaks⁹ in the Grange Road Connector area. Before ground is disturbed or further disturbed in this area, it should be determined whether the outcrops contain serpentine. If it does, then the area must be treated as sensitive habitat as determined by California Department of Fish & Wildlife. Because a biological survey performed in the field was not done for the addition of the habitat type serpentine outcrop to the PREIR, the identification of special status species (rare, threatened, endangered) typically found in serpentine soils may be incomplete; these plants are usually identifiable only in the spring.

While PREIR Table 4.4-2 identifies special status wildlife with potential to occur within the modified Area of Potential Effects (APE), the PREIR does not identify mitigation should special status species be destroyed or damaged. Mitigation Measure 3.4-3 is generic and unsatisfactory; it *"includes a preconstruction survey for special-status plants within a reasonable timeframe prior to development and includes avoidance measures where possible and options for transplanting and/or compensatory planting when plants cannot be avoided, which reduces this impact to less-than-significant levels"*¹⁰. This measure is unsatisfactory because the preconstruction survey for special status plants is done within a reasonable timeframe which may not be when special status species are visible—in the spring. When special status species aren't identified, mitigation measures for their damage and destruction cannot be designed.

PREIR Table 4.4-4 lists habitat type Leather Oak Chaparral¹¹ (2,529.8 acres) on the Guenoc Valley site and Grange Road Connector as non-sensitive. This listing may contain an error that masks special status species. The presence of Leather Oak and Leather Oak Chaparral indicates the presence of serpentine, a sensitive habitat. (Leather Oak is a strict endemic to serpentine.) Serpentine soils are host to special status species and indicate a need for further study to determine whether special status species are present.

PREIR Table 4.4.1 identifies 18.9 acres of serpentine outcrop¹² as a habitat type in the Grange Road Connector area. If development calls for disturbing serpentine soils, health and safety protocols are required by the state (e.g. CA Air Resources Board, CA OSHA, CA EPA), federal government (e.g. OSHA, EPA), and Lake County Air Quality Management District.

Because Lake County Board of Supervisors (BoS) values Lake County trees, each month since 3 May 2022, the BoS renews its proclamation of the existence of a local emergency due to pervasive tree mortality. Consequently, the welfare of blue oaks in the Grange Road Connector area is a concern.

PREIR Table 4.4-4, referenced above, identifies Blue Oak woodland and Blue Oak savanna habitats¹³ as sensitive. The former occupies 3,454.5 acres on the Guenoc Valley site and Grange Road Connector; the latter occupies 1,215.2 acres in the same area. Within the modified APE, Blue Oak woodlands comprise 153 acres and Blue Oak savanna consists of 96 acres.

Blue Oaks are not numerous and grow slowly; their destruction undermines the county's economic development based on its tourism draw as a regional outdoors destination. The plans for the Grange Road Connector are silent on potential impact to area habitat and species. The PREIR identifies 153 acres as the maximum for Blue Oak woodlands to be impacted; this is all of the Blue Oak woodlands in the modified APE. This is an alarming figure taken with the maximum project impacts¹⁴ to other woodlands:

- 96 acres of blue oak savanna
- 58 acres of interior live oak woodland
- 1 acre of valley oak woodland

⁸ PREIR, PDF p. 48.

⁹ PREIR, p. 104, PDF p. 128.

¹⁰ PREIR, p. 146, PDF p. 170.

¹¹ PREIR, p.144, PDF p. 168.

¹² PREIR, p.133, PDF p. 157.

¹³ PREIR, p. 144, PDF p. 168.

¹⁴ PREIR, p.159, PDF p. 183.

While the PREIR identifies the scope of the Grange Road Connector as for emergency use only by a few authorized parties, cumulative impact of traffic and road conditions are not described. Should use of Grange Road Connector expand beyond the few who initially be granted access, a thorough review of impacts and cumulative impacts is needed.

Water use, Maha (off site) Well and Drought Management Plan

On the subject of water use and drought management plan, Lake County is still subject to the California governor's drought state of emergency and Executive Order N-3-24. The California Water Commission (hereafter commission) defines drought: "Drought is not simply a lack of precipitation: It is a period of constrained supply when demand for water outstrips its availability."¹⁵ The commission's white paper released January 2024 declares, "In California, droughts need to be dealt with as a chronic phenomenon and not an occasional emergency. Attention to drought should be consistent, not sporadic."¹⁶

Given that long-time residents within the Middletown Area Plan boundaries have wells that run dry and must truck water in for survival, the project's plan for a golf course does not seem congruent with state efforts to conserve and use water responsibly. Golf courses, as are lawns, are infamous for their high water demand. The project's plans should reflect best practices for water management as a default, not as measures to be triggered by a declaration of drought.

In terms of smart development, the project competes for land reserved for growth of the town of Middletown. Allowing a planned development project take the space for planned town expansion doesn't allow Middletown many options for growth, where infrastructure exists. The question remains, who is to benefit from smart development? The town of Middletown or the project?

Smart development applies to the plan for and impact of the project's off site well¹⁷. LakeCAP supports the suggestion of the project gifting or otherwise making an arrangement with Callayome Water District for the district to manage the offsite well holistically for the benefit of Middletown Area residents and project residents. It would not be smart development to allow the project to tax the Callayome water supply by the water draw of the project's off site well. Before the project is approved, LakeCAP recommends that the plan and status of the project's off site well be finalized and documented (e.g. memorandum of understanding, condition of approval).

LakeCAP appreciates the opportunity to comment on this project's PREIR. LakeCAP's recommendations could function as conditions of approval for the project. We look forward to assisting the County of Lake navigate sustainable development while preserving characteristics valued by county residents and voters: rural and agricultural nature with small-town charm. We urge county leaders and decision-makers to stand up for these values identified by county residents and voters.

Sincerely,

Peter Luchetti
Angela Amaral
Jesse Cude
Holly Harris
Margaux Kambara
Tom Lajcik
Chuck Lamb

LakeCAP website: <https://lakecap.org>

¹⁵ California Water Commission, "Potential State Strategies for Protecting Communities and Fish and Wildlife in the Event of Drought," January 2024, p. 5; hereafter "State Drought Strategies".

¹⁶ "State Drought Strategies", p. 21.

¹⁷ PREIR, p. 30, PDF p. 54.

Redbud Audubon Society Comments: Guenoc Valley Mixed Use Planned Development: Lotusland Investment Holdings, Inc. July 17, 2025

Redbud Audubon Society wishes to express our deep concern for the potential impacts of the Guenoc Project, particularly in the Grange Road Connector area, where sensitive natural habitats, including rock outcrops, serpentine soils, and Blue Oak woodlands are that support rare and ecologically significant plant and animal life.

The project report identifies rock outcrops and blue oaks in this area. Before any ground disturbance occurs is essential to determine whether these rock outcrops include serpentine substrates. Serpentine soils are recognized by the California Department of Fish and Wildlife as sensitive habitat; due to the unique and often imperiled species they support. Yet, the report adds serpentine outcrops as a habitat type without conducting a dedicated biological field survey. This omission is concerning, as special-status plant species that depend on serpentine soils often emerge only in spring and may go undetected without seasonal surveys.

Table 4.4.1 identifies 18.9 acres of serpentine outcrop habitat in the Grange Road Connector area. Any development affecting these soils must comply with strict health and safety regulations from the California Air Resources Board, Cal/OSHA, CalEPA, federal OSHA, the U.S. EPA, and the Lake County Air Quality Management District. These protections are not optional; they are necessary to safeguard both public health and the ecological integrity of these rare habitats.

Table 4.4-2 lists special-status wildlife that may occur within the project's modified Area of Potential Effects (APE) but fails to provide specific mitigation if these species are harmed or displaced. Mitigation Measure 3.4-3, as written, is overly generic and inadequate. It allows pre-construction surveys "within a reasonable timeframe" before development, but this timeframe may not align with when sensitive plant species are visible—particularly those dependent on serpentine soils, which are identifiable primarily in spring. Without accurate identification, appropriate mitigation cannot be implemented.

Table 4.4-4 classifies 2,529.8 acres of Leather Oak Chaparral as "non-sensitive." This may be critical oversight. Leather Oak, (*Quercus durata*), grows on serpentine soil. Misclassifying this habitat as non-sensitive risks masking the presence of serpentine and overlooking the specialized plant and animal species it supports. A

more thorough assessment is needed to confirm habitat sensitivity and ensure protection.

We also want to emphasize our concern for Blue Oak woodlands and savannas in the area. The Lake County Board of Supervisors has, since May 3, 2022, renewed its declaration of a local emergency each month due to widespread tree mortality. In this context, the welfare of Blue Oaks—already limited in number and slow to regenerate—must be prioritized. These woodlands are not only ecologically important but also support Lake County's economy, drawing visitors to its natural landscapes and outdoor experiences.

The report acknowledges the sensitivity of Blue Oak habitats. Within the modified report 153 acres of Blue Oak woodland would be impacted. This is very alarming with the explosion of Mediterranean Oak Borer Beetles (MOB) destroying tens of thousands of the county's oaks. And the other losses of 96 acres of Blue Oak savannas, 58 acres of Interior Live Oak woodland and one-acre of Live Oak woodland are so alarming, also.

The County should be pro-active in saving our oaks. Scientific research indicates that MOB infestation will continue to kill oaks, and the report fails to address this.

The report fails to fully evaluate the Grange Road Connector's cumulative impacts, including road conditions, traffic, and potential future use beyond emergencies.

Given the ecological significance of serpentine soils and oak woodlands—and the rare plants and wildlife they support—we urge that all potential impacts be researched and avoided wherever possible. Protecting these habitats is not only vital for biodiversity but also for preserving the character, resilience, and environmental health of Lake County for generations to come.

Sincerely,

Redbud Audubon Society Chapter Members

Memorandum



To: Mireya Turner, Director
Lake County Community Development Department

From: Annalee Sanborn, Project Manager

Date: July 23, 2025

Subject: Guenoc Valley Mixed Use Development Project, Response to Late Comment Letter from Redbud Audubon Society Dated July 17, 2025

The purpose of this memorandum is to address comments raised in the July 17, 2025 letter from the Redbud Audubon Society regarding the Guenoc Valley Mixed Use Development Project (Proposed Project; State Clearinghouse No. 2019049134).

Serpentine Rock Outcrops

The commenter expresses concerns regarding the methodology for mapping serpentine rock outcrops, stating that "the report adds serpentine outcrops as a habitat type without conducting a dedicated biological field survey." As explained in the supporting Biological Resources Assessment prepared for the Draft PREIR (included as Appendix I-1), "previously mapped Rock Outcrop [within the Area of Potential Effects (APE)] are now considered sensitive as these areas are of serpentine rock with sparse vegetation cover that is dominated by serpentine indicator plant species." These rock outcrops were mapped by biologists during field surveys conducted for the Proposed Project, which is described in Table 3-1 of the Final PREIR. Figure 4-11 was added to the Final PREIR to depict the location of the rock outcrops and serpentine rock outcrops that were mapped on the Guenoc Valley Site and within the Grange Road Connector (see Final PREIR, page 87).

Furthermore, the commenter incorrectly states that there are 18.9 acres of serpentine rock outcrop in the Grange Road Connector, and cites Table 4.4-1 of the Draft PREIR. In actuality, Table 4.4-1 shows the total acreage of habitat types throughout the entire 16,000-acre Guenoc Valley Site plus the Grange Road Connector, but does not indicate any potential for impacts. Table 4.4-4 shows these same habitat types and the potential impact that could occur due to development of the Proposed Project, which is limited to a maximum of 3.9 acres of serpentine rock outcrop (see Draft PREIR, page 144).

The commenter further advises that development within these soils should comply with health and safety requirements from California Air Resources Board (CARB), California Occupational Safety and Health Administration (Cal/OSHA), California Environmental Protection Agency (CalEPA), federal OSHA, the USEPA, and the Lake County Air Quality Management District (AQMD). This comment is acknowledged and has already been addressed as a potentially significant impact within the EIR due to the potential for serpentine soil to contain naturally occurring asbestos (NOA), which is analyzed in Impact 3.8-2 and mitigated to less-than-significant levels via implementation of Mitigation Measure 3.8-5. The Original Project boundary contained approximately 1,000 acres of soils that have the potential to contain NOA, which was reduced via Project Modifications to only 669 acres of soils that may contain NOA (see Draft PREIR, page 202). The Proposed Project would comply with the regulations of the agencies referenced by this commenter, and Mitigation Measure 3.8-5 includes reference to the requirements of the Lake County AQMD specific to NOA, and requires preparation of and approval by the Lake County AQMD of an Asbestos Dust Mitigation Plan.

Special Status Wildlife and Plant Species

The commenter states that the Draft PREIR fails to provide mitigation to the species listed in Table 4.4-2. To clarify, Table 4.4-2 is located within the Section 4.4.2 “Environmental Setting” section of the document, intended to provide background information about what special-status wildlife species potentially exist on the Guenoc Valley Site. The analysis of impacts and mitigation for each individual species is provided in Section 4.4.4 “Impacts”, where all species listed in Table 4.4-2 that have the potential to exist onsite and further have the potential to be impacted are discussed (see Impact 3.4-1 starting on page 145 of the Draft PREIR).

The commenter states that Mitigation Measure 3.4-3 is “overly generic and inadequate,” but cites only the summary of the mitigation measure. Please refer to the full text of Mitigation Measure 3.4-3 which specifies that “pre-construction surveys shall be completed by a qualified biologist during the appropriate identification period for plants with the potential to occur in the area scheduled for ground breaking.”

Leather Oak Chaparral Alliance

California Department of Fish and Wildlife (CDFW) designations for whether natural communities are considered ‘sensitive’ were utilized for the CEQA analysis, as explained in Appendix I-1 of the Draft PREIR. CDFW has not designated the leather oak chaparral alliance as a sensitive community, and therefore impacts to leather oak chaparral are not considered significant under CEQA. Furthermore, while leather oak chaparral may occur on serpentine soils, it is not limited to serpentine soils, nor are serpentine soils themselves protected by CDFW. Any special-status plants that may be impacted by the Proposed Project would be mitigated to less-than-significant levels, whether the plants were located within leather oak chaparral or any other sensitive or non-sensitive habitat on the site (refer to Mitigation Measure 3.4-3).

Blue Oak Habitats

Blue oak woodland and blue oak savannah are designated as sensitive natural communities by CDFW and analyzed as such in Impact 3.4-2 of the Draft PREIR. The commenter notes that 153 acres of blue oak woodland would be impacted, but as explained in Section 1.4 “Terminology”, the APE refers to the maximum amount of area that *may be* directly impacted. “The entire APE will not be disturbed, rather it represents the outer perimeter within which impacts may occur”, particularly as the exact impact area for future construction within residential parcels has not yet been defined. Therefore, the final impacts to blue oaks may be less than 153 acres, but would not exceed this limit. It is also important to note that the Original Project could have impacted up to 599.4 acres of blue oak woodland and 269.4 acres of blue oak savannah, which has been greatly reduced under the Modified Project to only 153 acres and 96 acres, respectively (refer to Table 4.4-4 on page 133 of the Draft PREIR). The Oak Mitigation Plan (Appendix J to the Draft PREIR) contains a detailed discussion of mitigation strategy to minimize impacts to oak woodlands, including through preservation, replanting trees, and enhancing oak habitats. When replanting is required, the Oak Mitigation Plan has a sliding scale that ranges from 2:1 (replanted to impacted trees) up to 5:1, depending on factors such as the type of tree, habitat, and size class. The presence of Mediterranean oak borer (MOB) beetles in Lake County is an existing condition and not related to the Proposed Project, and therefore is not a Project-related impact under CEQA. Nevertheless, the Proposed Project must adhere to the Oak Mitigation Plan required by Mitigation 3.4-16 which has a minimum success rate of 80 percent for oak trees that are replanted, and provides for adaptive management if the success rate is not being met for any reason – which would include potential MOB beetles. While MOB beetle activity elsewhere in the County is not an impact under CEQA, the existing mitigation measures and plans for the Proposed Project will ensure that the oaks on the Guenoc Valley Site will be monitored and managed for health.

July 24, 2025

From: Lisa Kaplan <liskaplan@gmail.com>

Sent: Tuesday, July 22, 2025 10:58 PM

To: Laura Hall <Laura.Hall@lakecountyca.gov>; Mireya Turner <Mireya.Turner@lakecountyca.gov>; Monica Rosenthal <Rvineyards@sonic.net>; Helen Owen <Helen.Owen@lakecountyca.gov>

Subject: [EXTERNAL] Subject: Comment on Guenoc Valley Development EIR – Fire Risk, Evacuation, and Middletown Impacts

Dear Planning Commissioners, Community Development Department, and Planners,

Thank you for the opportunity to comment on the Guenoc Valley Development Environmental Impact Report.

Fire Risk and Evacuation Capacity Must Be Addressed Upfront

As a resident of the greater Middletown area, I am deeply concerned that the proposed Middletown workforce housing component—housing 300–350 people—has not been adequately evaluated in terms of fire danger and evacuation impact.

Middletown is in a high fire-risk zone with a painful history, including the 2015 Valley Fire. Highway 29 remains the town's only viable evacuation route for thousands of residents. Adding a high-density development at this scale, without a complete evacuation analysis, endangers the safety of the entire region—from Spruce Grove and Hidden Valley to Mount St. Helena. **We've faced mass evacuation before with fewer residents and barely managed. We cannot ignore the risks of repeating that experience under even more strain.**

The courts found the original Guenoc Valley EIR insufficient precisely for its lack of wildfire and evacuation analysis. While the revised EIR now includes mitigation measures such as emergency access routes and on-site fire services, no specific commitments have been made to Middletown, even though the proposed housing is within close proximity to the town center, the potential bottlenecks especially when combined with evacuations from Guenoc itself, have not been fully accounted for.

This proposal requires not only full transparency and environmental review, but proportional planning that does not place undue burden on an already vulnerable small town.

Flooding and Environmental Concerns

The proposed site sits in a designated floodplain. Raising land or importing fill could displace water onto adjacent properties, violating Chapter 25 of the Lake County Code. Long-time residents have already experienced flooding. Has a current Environmental Impact Report (EIR) been done for this site? Soil contamination, runoff, and drainage issues must be addressed before any permits are issued.

Zoning Compliance

The project appears inconsistent with Lake County's own regulations for floodplain development and land alteration. Chapter 25 and Article 35 of the County Code require strict compliance to prevent increased flood risk. Has the full permitting and review process been completed?

Unaddressed Community Impacts

This project would increase Middletown's population by over 25%. Yet, we've seen no thorough assessment of impacts on roads, water, emergency response capacity, schools, health care, or the town's ability to support a diverse and potentially multilingual population. We are still learning how to support our Spanish-speaking neighbors—how will we meet additional language needs of additional mono-lingual and bilingual populations discussed at public meetings?

Who is the Housing For?

Will this be mostly single adults in dense, shared quarters? How will community integration, services, and infrastructure be handled for such a demographic shift?

Strained Infrastructure

Can our small rural community absorb the sudden pressure on schools, health clinics, public transit, and essential services? Will this population shift jeopardize local eligibility for education and nonprofit grants by altering our socioeconomic profile?

A Call for Proportion and Responsibility

We need clarity, transparency, and proportional planning. If some workforce housing is necessary in town, it should be scaled to meet family needs only—perhaps 50–100 people—and the rest relocated to the larger MAHA Guenoc property. This would minimize strain on local systems and better serve both residents and incoming workers.

We request a pause until a full and current EIR is completed, and these concerns are addressed with input from the community.

Sincerely,

Lisa Kaplan

Hidden Valley Lake resident

Valley Fire Survivor

Lisakaplan.art@gmail.com

--Lisa Kaplan

www.LisaKaplanArt.com

Art / Education / Digital Media and Design

Tel: 707-987-9095

Cell: 707-295-6663



July 23, 2025

Sent via email

Laura Hall
Senior Planner,
255 N. Forbes Street
Lakeport, CA 95453
guenocvalleycomments@lakecountycal.gov

**Re: Comments on the Final Partially Revised Environmental Impact Report for the
Guenoc Valley Mixed Use Planned Development Project (State Clearinghouse No.
2019049134)**

Dear Ms. Hall:

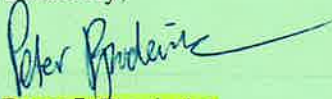
This letter is submitted on behalf of the Center for Biological Diversity (“Center”) regarding the Final Partially Revised Environmental Impact Report (“FEIR”) for the Guenoc Valley Mixed Use Planned Development Project (“Project”), State Clearinghouse No. 2019049134 and associated approvals. These comments follow our May 2, 2025 comments on the Draft Partially Revised EIR, which are incorporated herein by reference. As the FEIR was only recently made publicly available, we anticipate submitting further, more detailed substantive comments.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people throughout Lake County.

As we explained in our previous comments, the Center recognizes the developer’s efforts to modify the original Project to reduce wildfire risks and greenhouse gas emissions—which efforts came as a result of the Center’s successful challenge to the adequacy of the County’s environmental review in the trial court and the Court of Appeal. However, the FEIR’s minor text modifications fall short of addressing the concerns identified in our May 2 comments. The

Center urges the County to revise the FEIR to address those concerns prior to considering approval of the Project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter J. Broderick", with a long horizontal flourish extending to the right.

Peter J. Broderick

Attorney

2100 Franklin St., Suite 375

Oakland, CA 94612

pbroderick@biologicaldiversity.org

9:05 a.m.
July 24, 2025

Laura Hall

From: Arlene Hockanson <ahockanson@yahoo.com>
Sent: Wednesday, July 23, 2025 8:39 PM
To: Laura Hall
Subject: [EXTERNAL] Noise concerns from Guenoc project

Please forward this to the planning commission:

I would like it known I am against any planes or helicopters flying over my home to the Guenoc project! It is not only disruptive but violates my privacy.
We as a community have a right to our privacy, a right to sleep without noise waking us up at 7am & a right to work in our yards, eat or entertain without the noise of a plane/helicopter flying over.
With all the land they have available they can find a place to land away from Butts Canyon on their site & avoid disturbing our community.
It is absurd that they want to fly over from 7-7 all day and unacceptable!
No hours are acceptable in my opinion!

Sincerely,
Arlene Hockanson
19298 Butts Canyon
Middletown

Sent from my iPhone

✓ 6a
9:05am
7-24-25



July 24, 2025

Dear Lake County Planning Commission Members:

Everardo Chavez Perez, Chair and District II Representative
Monica Rosenthal, District I Representative
Batsulwin Brown, District III Representative
Maile Field, District IV Representative
Sharron Zoller, District V Representative

On behalf of the Lake County Community Action Project: Planning Coalition (LakeCAP), we hope this message finds you well. LakeCAP is a coalition of engaged community members representing a broad spectrum of public perspectives in Lake County.

This letter is prompted by the Planning Commission's upcoming review on **July 24, 2025**, of the **Guenoc Valley Mixed-Use Planned Development Project Partially Revised Environmental Impact Report (PREIR) (EIR 24-01)**.

At this time, we respectfully request that the Planning Commission:

- *not certify* the PREIR (Partially Revised Environmental Impact Report). The PREIR inadequately addresses wildfire hazard mitigation and wildfire evacuation planning.
- strongly consider Alternative C described in *Findings of Fact & Statement of Overriding Consideration*
- If Alternative C is rejected, *recommend against* the requested General Plan Amendment and Rezone of Project area to Commercial Resort for the unplanned remainder of the project (13,000 acres).

PREIR and Wildfire Mitigation

In February 2022, the Lake County Superior Court required Lake County to bring the Project's EIR (Environmental Impact Report) into compliance. Addressing community wildfire evacuation was among the changes to the Final EIR.

The Final EIR presented for your commission's affirmative recommendation falls short. The project estimates "... under full buildout...the Project evacuation trips are estimated to add up to approximately 2.5 hours for 100 percent evacuation of South Lake County when combined with evacuation trips from the surrounding communities¹." This does not seem to be a wise tradeoff for promised economic development. South County has a recent history of surviving devastating and deadly wildfires. A two-and half-hour delay can be life-threatening.

One of the Project's strategies for wildfire evacuation is by air. This approach also entails a 2.5 hour delay in evacuation. The Project's plan does not account for the limitations of air evacuation: good visibility (e.g. little or no smoke), and daylight (few pilots fly at night).

More attention in the PREIR should be devoted to the description of and strategy for Temporary Refuge Areas (TRA). The PREIR doesn't acknowledge the health and safety mitigations required by Federal and state for building the proposed emergency egress, the Grange Road Connector; Lake County GIS parcel viewer shows that the parcels along Grange Road contain serpentine, requiring safety protocols and pavement for the road to be drivable. Please see LakeCAP's separate letter sent today on Grange Road Connector for additional detail.

Alternative C: High Density, Compact Development Footprint Alternative

"Under the High Density/Compact Development Alternative (Alternative C), open space would be increased, and development areas would decrease, however, the overall number of residential units would remain the same. This would result in an increase of project density within a smaller site footprint. Both the Phase 1 and future phase development footprint would be reduced to the area of the lots within the Maha Farm and Bohn Ridge planning areas. All of the 400 hotel units would be combined into one large hotel and the 1400 residential estates, and 450 resort residential units would have significantly reduced lot sizes. This would reduce the average lot size from 4.8 acres to 0.8 acres. Open space areas would increase proportionally. Many of the resort amenities would be reduced; however, the golf course would remain in its proposed location. The Off-Site Workforce Housing in Middletown would also remain identical to the Project."²

Community members who value open space, the county's rural and agricultural nature, see potential in Alternative C as a compromise for the community, county and the developer. The developer's reluctance to reduce the number of housing units³ is understandable, but if maximum or high profit margin is the developer's criterion to be an acceptable alternative, then it is possible that no alternative can be crafted.

PREIR, General Plan Amendment, Rezone to Resort Commercial

As outlined in LakeCAP's letter dated **May 2, 2025**, addressed to Laura Hall, the Senior Planner overseeing the Guenoc Valley Project (sent to you on July 24, 2025 for reference), we respectfully request that any approval of the PREIR for **Phase I** of the Guenoc Valley Project—covering approximately **3,000 of the 16,000 acres** designated for future development—be **conditioned** upon a formal review of the remaining **13,000 acres** as part

¹ Guenoc Project Findings of Fact & Statement of Overriding Consideration, p, 130.

² Guenoc Project Findings of Fact & Statement of Overriding Consideration, p,144-145.

³ Guenoc Project Findings of Fact & Statement of Overriding Consideration, p. 128.

of the **Lake County General Plan 2050 Update**. We understand that addressing PREIR wildfire mitigation issues raised must be done before Phase 1 PREIR certification can occur.

At a special meeting hosted by Middletown Area Town Hall (MATH) on July 21 on this subject, residents called for dialogue, and review of zoning and other concerns to continue while the **Lake County 2050**, the County's **General Plan** and **Middletown Area Plan** update, is underway. LakeCAP concurs. The proposed Project changes can fundamentally alter the character and appearance of Lake County valued overwhelmingly by Lake County 2050 survey respondents and residents.

Although the Project includes a proposed exchange to increase agricultural land, concerns remain about the commitment to smart development within the newly established **Guenoc Valley District (GVD)**. Lands previously zoned for agricultural use are proposed to be part of the 16,000 acres designated **Commercial Resort**, eliminating agricultural land-use constraints and raising the risk of unchecked sprawl and high-density development.

We encourage Lake County Community Development Department's efforts to increase community involvement in the General Plan and Local Area Plans update. We suggest that the community, County and the developer engage in discussions on land use for Project Phase II and later phases to complement the county's update on the General Plan and Middletown Area Plan.

The land use changes establishing the Guenoc Valley District (GVD) occurred during the COVID-19 pandemic, a time that significantly limited the public's ability to participate in planning meetings. Given this context, we urge the Planning Commission to support a **comprehensive review** of the **13,000 acres** not included in Phase I to ensure a balanced, forward-looking approach to development.

We appreciate your attention to this matter and welcome the opportunity to provide additional input. We understand that this Project entails thousands of pages of reports and public comments to be read between Friday, July 18 when the County posted the files and the morning of the hearing (July 24) on this subject. It would be reasonable for your commission to continue this agenda item to give this topic the attention it deserves.

Sincerely,
Peter Luchetti
Angela Amaral
Margaux Kambara
Tom Lajcik

✓ 6a
9:05 am
7-24-25



July 24, 2025

Dear Lake County Planning Commission Members:

Everardo Chavez Perez, Chair and District II Representative
Monica Rosenthal, District I Representative
Batsulwin Brown, District III Representative
Maile Field, District IV Representative
Sharron Zoller, District V Representative

On behalf of the Lake County Community Action Project: Planning Coalition (LakeCAP), we hope this message finds you well. LakeCAP is a coalition of engaged community members representing a broad spectrum of public perspectives in Lake County.

We are writing regarding the Planning Commission's review on July 24, 2025 of the **Guenoc Valley Mixed-Use Planned Development Project Partially Revised Environmental Impact Report (PREIR) (EIR 24-01)**.

Grange Road Connector – Emergency Ingress and Egress

Referring to the Partially Revised Environment Impact Report's (PREIR) Figure 3-4 (page 50), illustrating the proposed Grange Road Connector for emergency ingress and egress in the event of wildfire, LakeCAP has significant concerns.

The area defining the proposed Grange Road Connector was devastated by the 2015 Valley Fire, resulting in major property losses, including livestock. While LakeCAP recognizes the necessity of this connector for life safety and property protection, it is important to note that Grange Road is shared by several families and businesses who rely on it for daily and emergency access.

In the event of a large-scale evacuation, Grange Road in its current condition would be severely limited in handling the traffic demand—potentially thousands of vehicle trips within hours (see Table 3.4-2). Grange Road does not meet State Responsibility Area Fire Safe regulations, Public Resource Code 4290 road standards for minimum width, stipulations on

grade, turning radius, turnaround, turnouts and dead-end roads. The PREIR should address this requirement.

In addition, the parcels along Grange Road contain serpentine soils according to Lake County GIS parcel viewer. Serpentine contains naturally occurring asbestos, a carcinogen. By federal and state law, serpentine soils require health and safety protocols when disturbed. Lake County Air Quality Management District requires roads to be paved if they traverse serpentine soils and will support vehicular traffic. These factors are not identified in the PREIR.

Table 3.4-2: Evacuation Trips for Community and Project Phases

Group	Unit Type	Quantity	Trips Generated
Community Population			
Primary Households	Dwelling Units	4,455	7,735
Secondary Homes	Dwelling Units	1,214	1,457
Hotels	Hotel Rooms	123	105
Employees at Work (live and work inside Evacuation Area)	Persons	1,591	1,591
Employees at Work (work inside but live outside Evacuation Area)	Persons	1,240	1,240
Employees at Work (live inside but work outside Evacuation Area)	Persons	1,414	1,414
Sub-Total		10,037	13,542
Project Phase 1			
Residential Estate Units	Dwelling Units	385*	659*
Resort Residential Units	Dwelling Units	141	141
Hotels	Hotel Rooms	147*	103*
Employees**	Persons	610	610
Visitors	Persons	100	83
Sub-Total		1,383*	1,569*
Project Full Build-Out (including Phase 1)			
Residential Estate Units	Dwelling Units	1,400	2,394
Resort Residential Units	Dwelling Units	450	450
Hotels	Hotel Rooms	400	280
Employees	Persons	1,220	1,220
Visitors	Persons	200	167
Sub-Total		3,670	4,511

Notes:

*The Wildfire Evacuation Assessment analyzed 401 residential estate units (16 more than the 385 estates that are proposed) and 127 hotel rooms (20 less than what is proposed). The Supplemental Memorandum (February 9, 2024, **Appendix H-2**) corrected the residential estate and hotel rooms.

**Workforce Co-Housing is included with Employees.

Source: Fehr & Peers (**Appendix H-1** and **Appendix H-2**)

LakeCAP's Requests for Collaborative Planning

To ensure that the Grange Road Connector serves its intended emergency function without compromising the safety of neighboring property owners, LakeCAP respectfully requests open dialogue between the County, the developer, and affected stakeholders. Specific points for discussion include:

- **Route Definition and Transparency**
A clear and complete definition of the connector route is needed—from the Guenoc Valley Project's main road to Highway 29, utilizing Grange Road and other County and private roads. While some segments are currently undeveloped, others are primitive ranch roads requiring major upgrades.
- **Route Length and Composition**
The full evacuation route—including the connector and Grange Road—spans approximately 7.7 miles to Highway 29. The capacity and condition of this entire stretch must be evaluated holistically.



- **Necessary Infrastructure Improvements**
Significant upgrades are required for Grange Road and adjacent access roads to support both daily travel and emergency operations. These improvements must also account for the existing users who depend on these roads.
- **Dual-Direction Emergency Flow**
Emergency planning must prioritize both evacuation (outbound) of Guenoc Valley residents and access (inbound) by first responders—e.g., Southern Lake County Fire District, Cal Fire strike teams, PG&E, and law enforcement. The route must be managed to avoid bottlenecks or obstructions that could hinder emergency services.
- **Mutual Cooperation Agreement**
LakeCAP urges the establishment of a formal agreement between the Guenoc Valley Project, the County and surrounding property owners. This agreement should define

protocols for communication, coordination, and mutual assistance during wildfire and other disaster scenarios. As demonstrated during the Valley Fire (2015) and the LNU Complex Fire (2020), help may not arrive in time—making proactive cooperation essential.

- **Lack of Detail in the PREIR**

The PREIR provides only a vague outline of the Grange Road Connector. While further detail is anticipated, LakeCAP emphasizes the need for the County and developer to commit to resolving the connector's design, function, and operational role before approval is granted.

Serpentine along Grange Road poses an environmental issue. California Department of Fish & Wildlife recognizes serpentine as sensitive habitat where special status species (endangered, threatened and rare) may live. *Findings of Fact and Statement of Overriding Consideration* for the Project acknowledges serpentine outcroppings within its boundaries.

Conclusion

More work is needed to ensure that the Grange Road Connector is safe, practical, and beneficial to all affected communities. The presence of serpentine may rule out Grange Road Connector as a wildfire evacuation solution. LakeCAP requests an open and transparent dialogue with County officials and the developer to define a well-structured agreement for the development and operation of the Grange Road Connector. We respectfully ask that such an agreement be made a condition of any approval of the PREIR currently under consideration by the Planning Commission.

Sincerely,
Peter Luchetti
Angela Amaral
Margaux Kambara
Tom Lajcik

From: noreply@granicusideas.com
Sent: Thursday, July 24, 2025 8:12 AM
To: Danae LoDolce; Mireya Turner; rvineyards@sonic.net; everardo2797@gmail.com; eaglebrown19@gmail.com; fieldmaile@gmail.com; szoller@hotmail.com
Subject: [EXTERNAL] New eComment for Planning Commission on 2025-07-24 9:00 AM

[Lake County](#)

New eComment for Planning Commission on 2025-07-24 9:00 AM

Julia Bono submitted a new eComment.

Meeting: Planning Commission on 2025-07-24 9:00 AM

Item: 6a 25-7569:05 a.m. PUBLIC HEARING - 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, and UP 24-08, for the Guenoc Valley Mixed Use Planned Development Project. Applicant: Lotusland Investment Holdings, Inc

eComment: Comments for Lake County Planning Commission – Public Hearing on MAHA Developments Middletown Site: "Good afternoon Planning Commissioners, and thank you for the opportunity to speak today. My name is Rev. Julia Bono, and I represent the Rainbow Church of Living Light in Middletown. I also speak today on behalf of many concerned Middletown residents who have reached out to us in recent months, united in their deep love for our town and their growing alarm about the large proposed Guenoc Valley Project worker co-housing development planned for Santa Clara Rd in central Middletown. As you may know, Middletown is a small, resilient and diverse community. We have endured serious hardships together, including the devastating Valley Fire, and we continue to rebuild our small town of largely single family homes with care and intention. At our Church, we believe we have a moral and spiritual responsibility to serve and protect the surrounding land, water and the community of people who call this place home. After extensive dialogue with local residents, our collective position is clear: the proposed Middletown Worker Co-Housing Site on Santa Clara Rd within walking distance to downtown Middletown is just not appropriate for this town's scale, infrastructure or cultural character. The intended site lies on rural zoned land in a high flood risk zone and is surrounded by fire-prone terrain. It also poses possible adverse environmental effects on adjacent Dry Creek. Yet we have seen no adequate fire evacuation planning, no clear Middletown infrastructure expansion strategy or funding offers, no environmental study of the likely impact on Dry Creek, and little meaningful engagement with our residential community most affected. Let me be clear: we are not opposed to the Guenoc Valley development. We are opposed to development that disregards the will, investments and well-being of the Middletowners who were living here first. There are over 16,000 acres available at the Guenoc Valley Project Site just a few miles away from Middletown which is far better suited for high-density worker housing and can be more responsibly funded and managed by the project. While we were also concerned