

Johanna DeLong

From: Karen Sullivan <greymare56@gmail.com>
Sent: Thursday, August 8, 2024 1:08 PM
To: Karen Sullivan; Johanna DeLong
Subject: [EXTERNAL] Appeal (AB24-02) for Highland Farms, LP (UP 20-96)
Attachments: GPSmapgrowsiteanduddingroadtrailshighlight2.jpg; Udding road serpentine bluff.docx; rareserpentinecryptantha.jpg; Hesperolinonsdenophyllum.jpg; Hemizonia congests ssp. calyculata.jpg; Fritillariapurdyi.jpg; Streptanthusbarbiger.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

8-6-2024

To the Lake County Board of Supervisors and the Community Development Team,

I am a 33 year registered voting resident and taxpayer of Lake County and am submitting my comments regarding the Appeal for the Highland Farms Cannabis project (Appeal (AB24-02) for Highland Farms, LP (UP 20-96). I have worked for 4 decades now as a volunteer with the county and have been on the Mt. Konocti County Park Master Plan committee, the Konocti Regional Trails Master Plan Committee, the Highland Springs Trails Volunteers and the recent Lake County Parks, Recreation and Trails Master Plan. I also worked with Botanist Ed Dearing on the botanical inventory for Mt. Konocti County Park.

I have extensive knowledge of the terrain, trails and flora at Highland Springs Recreation Area (HSRA). I started with trail maintenance in the early 1990's and in 2001, I was part of a volunteer group invited by Bob Lossius, at the then County Department of Flood Control, to help develop a park-wide trail system. Our group, the Highland Springs Trails Volunteers (HSTV) have been working on recovering those trails and fire roads and keeping them open for 3 decades. We have collaborated with all the department managers and program coordinators to present date. We found county property survey markers, submitted GPS data on all trails to the county, did fundraising for, and installed trail signs, and recently, worked with TERA to provide an accurate trail map. As a founding member of the Lake County Horse Council (LCHC), we also did trail repair by attaining a grant to repair the rutted Lake Trail. The LCHC in 2010, at the request of Director Scott DeLeon, also wrote a Highland Springs Recreation Area Master Management plan for the park, as none existed. The HSTV has been on every boundary line on the HSRC property and we have left much blood sweat and tears on the trails. The Trails Volunteers have also reported trash dumped in creeks, and reported illegal camping, ORV damage and cannabis grows. We have strived to be positive stewards of the park.

We cleared and GPSed the Quarry trail, which in two directions, leads directly to the proposed grow site. We cleared and GPSed both Lone Pine and Loco trails. Lone Pine touches and parallels Udding Road, and Loco trail crosses Udding road. These trails have had maintenance and GPS tracking data given to the county for 17 years. Why isn't the County enforcing the 1000 ft set back to public lands? By definition, and in the county Ordinance, "All State and County Parks are public lands."

Quarry trail also follows a stream than drains the proposed grow site wetlands and empties into Highland Creek

Also as the Trails Volunteers, we started a botanical list with photographs. In working on the trails and identifying the native trees, shrubs and other plants, we made notations of listed rare and endangered plants (California Native Plant Society Inventory list), and in the case of the serpentine bluff bisected by Udding road, we rerouted a trail that went through some sensitive species. We led wildflower hikes with botanist Ed Dearing, who also helped us on the identification of the rare species. We believe HSRA is a true botanical hot spot with many different habitats, from lakeside, to riparian, grasslands, oak woodland, pine woodland and the serpentine, encompassing a huge variety of flora. The serpentine bluff crossed by Udding road has at least 5 noted rare species of plants and possibly more.

With Udding Road as the site access, there will need to be extreme grading of the serpentine. This will produce many negative environmental impacts, including asbestos dust. Currently the road is only accessible with 4WD, is extremely rutted and has listed rare plants on road edge. Why was this not assessed for the permit?

Finally, the environmental analysis did not adequately consider the traffic impacts to the Highland Springs area. Highland springs road does not meet consistent width requirements for a two lane road, and in fact, the section of road by address 7075 Highland Springs Road, Parcel: 007-019-14 is a blind corner, obscured by homeowners vegetation and only 18 to 20 ft. wide in places. There have already been multiple car crashes and fires at that location over the years. The addition of trucks and construction equipment will negatively impact neighbors, park users, and introduce further safety hazards, unless properly mitigated. I drive that road on a regular basis and have nearly been hit many times.

Until a full EIR that analyzes and fully addresses the serious negative impacts to the public recreation area, neighbors, traffic issues and rare plant species is performed, the permit should not be approved.



Thank you,
Karen Sullivan
7480 Kelsey Creek Drive
Kelseyville, CA 95451
707 349-1559

attachments:

1. Screen shot of GPS trails on county map showing highlighted Quarry trail going directly to the grow site, as well as Lone Pine and Loco trails touching Udding Road.
2. List of rare plants found adjacent to Udding Road on the serpentine, as well as rare plants noted in Highland Springs 3812288 quadrangle and within several miles of Udding road (within last 10 years)
- 3, CNPS Inventory location of rare Serpentine cryptantha on serpentine bluff
4. CNPS Inventory location of rare Glandular Western Flax on serpentine bluff
5. CNPS Inventory location of rare Mendocino Tarplant on serpentine bluff

6. CNPS Inventory location of rare Purdys Fritillary on serpentine bluff

7. CNPS Inventory location of rare Bearded Jewelflower on serpentine bluff



Native Status:

Common Name:

Start Date: End Date:

Observer:

OTHER SOURCES: CCH + CNABH + iNaturalist

MORE CRITERIA

Location Description:

Location Quality:

Source:

Number of Plants:

Plant List:

Indexed After: Before:

Natural Status:

Phenology:

Category:

Photo Contest Category:

History Filter:

Questionable Records:

Documentation:

anywhere in map area

POLYGON

Photos:

County:
 Alameda
 Alpine
 Amador
 Butte
 Calaveras
 Contra Costa
 Colusa
 Del Norte

Photo Contest Category:

Documentation:

Columns: [customize](#)

[SEARCH](#)

Click on to select a record. Click on column title to sort. 46 records

ID	Plant	Photo	Observer
po266323	Fritillaria purdyi Purdy's fritillary		Karen Sullivan

LEGEND LAYERS

Map Satellite

RECORD DETAIL po266323
 Taxon: **Fritillaria purdyi**
 Date: **2024-03-20**
 Observer(s): **Karen Sullivan**
 Notes: **Many on bluff bisected by Udding road off Highland Springs Road**

Highland Springs Rd
 Highland Springs Rd
 412

Google Keyboard shortcuts Map Data 20 m Terms Report a map error

39.0625, -122.7303

2024-03-20	Lake
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Scientific Name exact match

Hemizonia congesta ssp. calyculata

Native Status
any

Common Name

anywhere
 in map area

Start Date
yyyy-mm-dd

End Date
yyyy-mm-dd

Observer

POLYGON

OTHER SOURCES
CCH + CNABH + iNaturalist

include surveys/checklists
 include obscured records

Photos
any

MORE CRITERIA

Location Description

Location Quality
any

County
any
Alameda
Alpine
Amador
Butte
Calaveras
Contra Costa
Colusa
Del Norte

Source

Number of Plants
at least one

Plant List

Indexed After
yyyy-mm-dd

Before
yyyy-mm-dd

Natural Status
WILD

Phenology
any

Category
any

Photo Contest Category
any

History Filter
All records

Questionable Records
do not include

Documentation
reported or specimen

Columns
Basic

customize

SEARCH

Click on to select a record. Click on column title to sort.

9 records

ID Plant Photo Observer

	mg247154	Hemizonia congesta ssp. calyculata Mendocino tarplant	
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Thomas Lajcik

2024-06-10

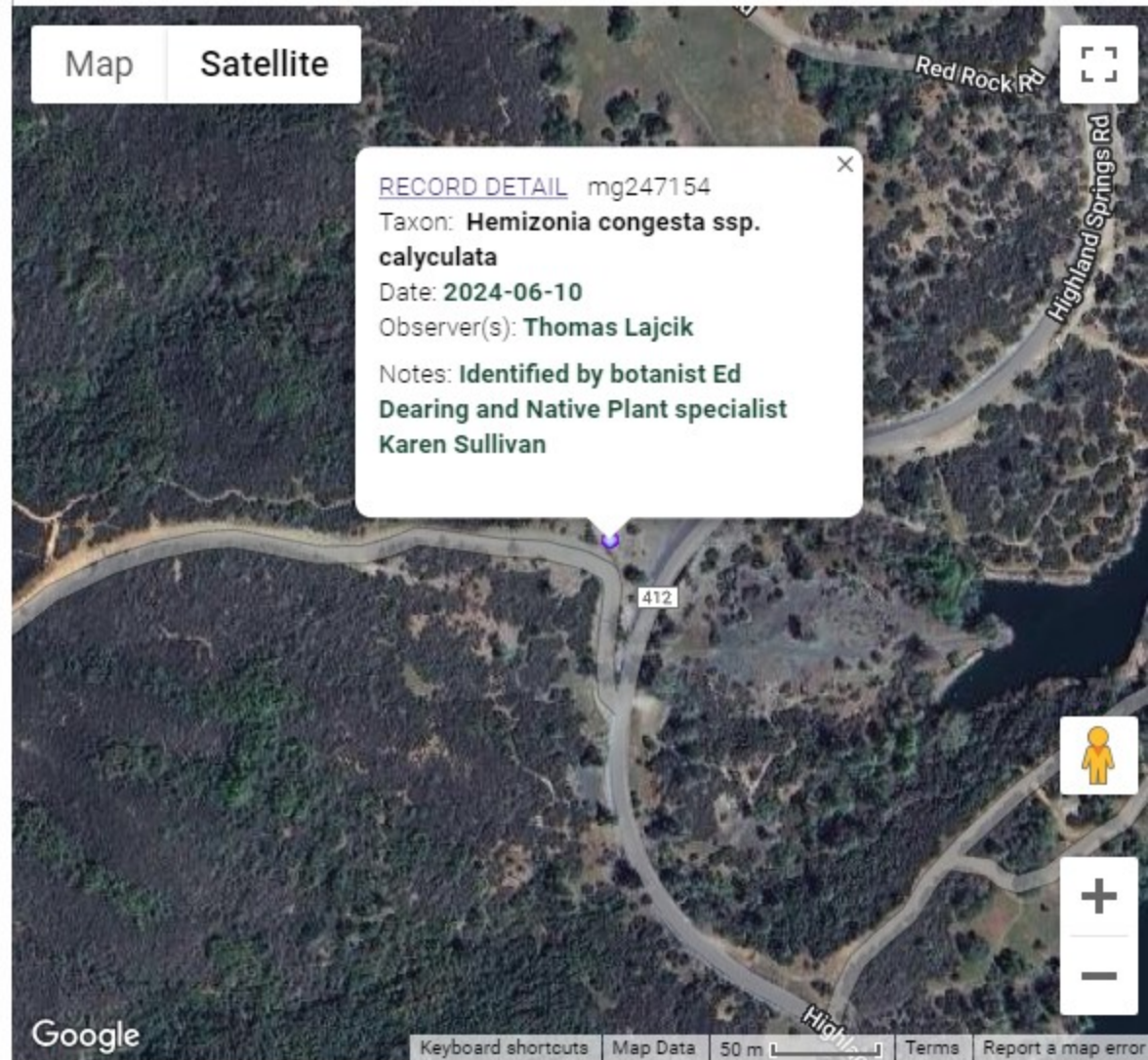
Lake

LEGEND

LAYERS

Map

Satellite



RECORD DETAIL mg247154

Taxon: **Hemizonia congesta ssp. calyculata**

Date: 2024-06-10

Observer(s): Thomas Lajcik

Notes: Identified by botanist Ed Dearing and Native Plant specialist Karen Sullivan

Google

Keyboard shortcuts Map Data 50 m Terms Report a map error

39.1250, -122.8125



ID	Plant	Photo	Observer
	Glandular western flax		Karen Sullivan
mg247156	Hesperolinon adenophyllum Glandular western flax		Thomas Lajcik, Ed Dearing, Karen Sullivan
mg247155	Hesperolinon adenophyllum Glandular western flax		Thomas Lajcik, Ed Dearing, Karen Sullivan
mg247153	Hesperolinon adenophyllum Glandular western flax		Thomas Lajcik, Ed Dearing, Karen Sullivan
mg247152	Hesperolinon adenophyllum Glandular western flax		Thomas Lajcik, Ed Dearing, Karen Sullivan

LEGEND LAYERS

Map **Satellite**

[RECORD DETAIL](#) mg247152

Taxon: **Hesperolinon adenophyllum**

Date: 2024-06-10

Observer(s): **Thomas Lajcik, Ed Dearing, Karen Sullivan**

Location: **On bluff of Highland Springs Rd. near Udding Rd.**

Google Keyboard shortcuts | Map Data | 50 m | Terms | Report a map error

39.1281, -122.8688

				2024-06-10	Lake	On bluff of Highland Springs Rd. near Udding Rd.

Cryptantha dissita

Serpentine cryptantha

native to California



© 2020 Terrence Gosliner

Annual herb

BORAGINACEAE



© 2019 Terry Gosliner

Potential habitat

by Watershed

by Climate Model

Individual observations

update

4 records

simple point

obscured point

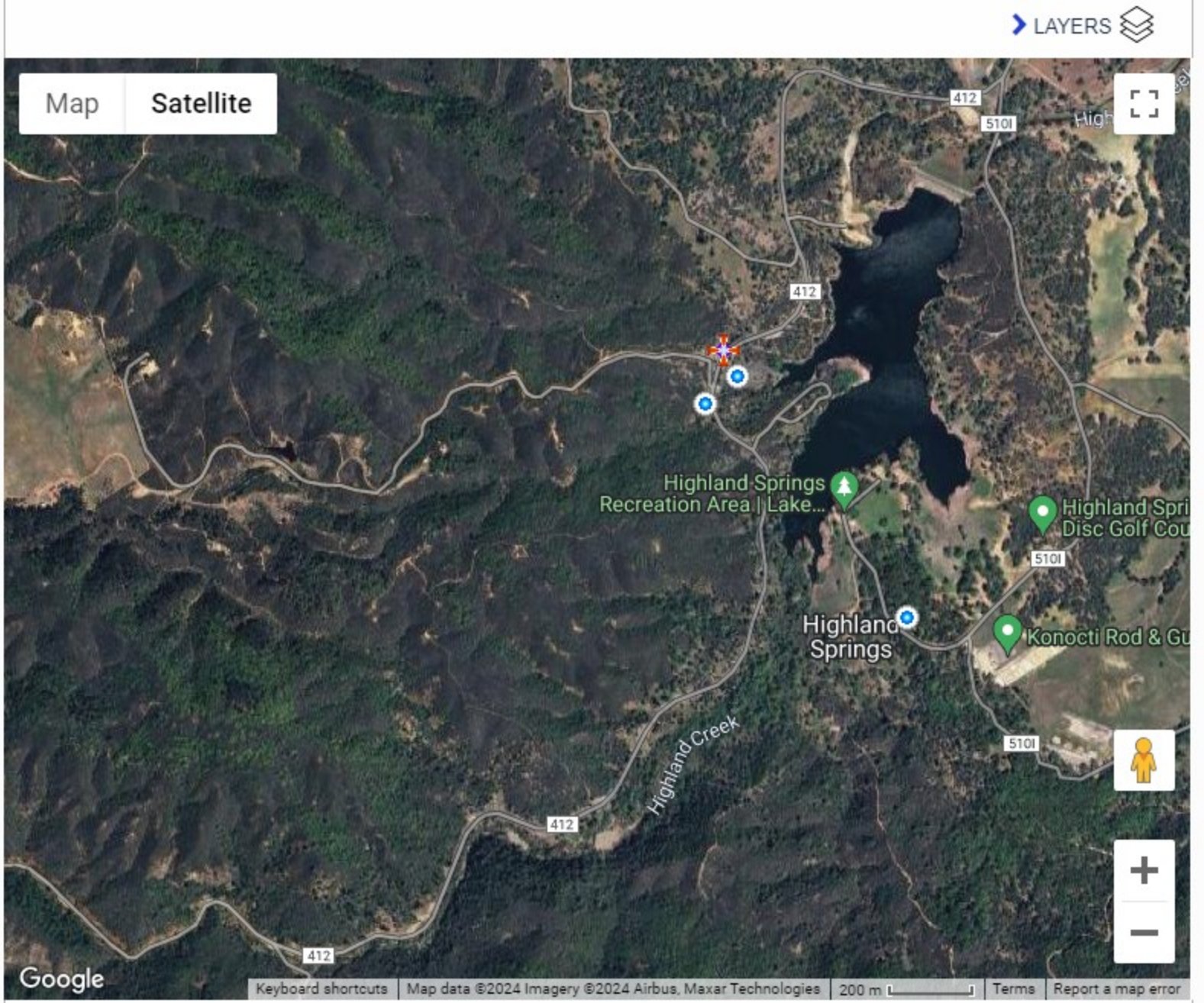
specimen

survey / checklist

quad (from CNDDDB)

potential habitat

questionable






Phenology: any
 Category: any
 Photo Contest Category: any
 History Filter: All records
 Questionable Records: do not include
 Documentation: reported or specimen

Columns: Basic
[customize](#)

Click on to select a record. Click on column title to sort. 61 records

ID	Plant	Photo	Observer
po161217	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161218	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161219	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161220	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161221	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161222	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161223	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell
po161224	Streptanthus barbiger Bearded jewelflower	none	Ryan O'Dell

po157737	Streptanthus barbiger Bearded jewelflower		Terrence Gosliner
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LEGEND [LAYERS](#)

Map Satellite

RECORD DETAIL po157737
 Taxon: **Streptanthus barbiger**
 Date: 2020-05-16
 Observer(s): **Terrence Gosliner**
 Location: **Highland Springs Reservoir**

Google
 Keyboard shortcuts | Map Data | 50 m | Terms | Report a map error

39.0612, -122.7884

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California Native Plant inventory of rare plants and ranking:

<https://www.cnps.org/rare-plants/california-rare-plant-ranks>

Rare and Endangered native plant species on Serpentine bluff off Udding Road:

Serpentine Cryptantha *Cryptantha dissita* California Rare Plant Rank: 1B.2 (rare, threatened, or endangered in CA and elsewhere).

Glandular Western Flax *Hesperolinon adenophyllum* California Rare Plant Rank: 1B.2 (rare, threatened, or endangered in CA and elsewhere).

Mendocino Tarplant *Hemizonia congesta* ssp. *calyculata* California Rare Plant Rank: 4.3 (limited distribution).

Purdys Fritillary *Fritillaria purdyi* California Rare Plant Rank: 4.3 (limited distribution).

Bearded Jewelflower *Streptanthus barbiger* California Rare Plant Rank: 4.2 (limited distribution).

Re-check in spring:

Rayless Layia *Layia discoidea* California Rare Plant Rank: 1B.1 (rare, threatened, or endangered in CA and elsewhere).

Arctostaphylos stanfordiana ssp. *raichei* California Rare Plant Rank: 1B.1 (rare, threatened, or endangered in CA and elsewhere).

Also rare plants noted in Highland Springs 3812288 quadrangle and within several miles of Udding road (within last 10 years) :

Colusa layia *Layia septentrionalis* California Rare Plant Rank: 1B.2 (rare, threatened, or endangered in CA and elsewhere).

Tall Snapdragon *Antirrhinum virga* California Rare Plant Rank: 4.3 (limited distribution).

Bent Flowered Fiddleneck *Amsinckia lunaris* California Rare Plant Rank: 1B.2 (rare, threatened, or endangered in CA and elsewhere). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Konocti Manzanita *Arctostaphylos manzanita ssp. elegans* California Rare Plant Rank: 1B.3 (rare, threatened, or endangered in CA and elsewhere). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Pink Star Tulip *Calochortus uniflorus* California Rare Plant Rank: 4.2 (limited distribution). County property off the Toll Road Karen Sullivan

Small flowered calycadenia *Calycadenia micrantha* California Rare Plant Rank: 1B.2 (rare, threatened, or endangered in CA and elsewhere). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Four Petaled Pussy Paws *Calyptridium quadripetalum* California Rare Plant Rank: 4.3 (limited distribution). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Mt. St. Helena Morning Glory *Calystegia collina ssp. oxyphylla* California Rare Plant Rank: 4.2 (limited distribution).). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Tracys Clarkia *Clarkia gracilis ssp. tracyi* California Rare Plant Rank: 4.2 (limited distribution). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Napa Blue Curls. *Trichostema ruygtii* California Rare Plant Rank: 1B.2 (rare, threatened, or endangered in CA and elsewhere). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')

Golden linanthus *Leptosiphon aureus* also called *Leptosiphon acicularis* California Rare Plant Rank: 4.2 (limited distribution). (RECORD DETAIL cn1813 Checklist Source: CNPS Inventory Database Location: within quad 3812288 aka 'Highland Springs')