

To: Community Development Department Planning Division
Attn: Max Stockton
CannabisCEQA@lakecountyca.gov

From: Gerry Shaul
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Project Title: Lemon Glow Cannabis Cultivation Project
(UP 21-49 (IS 21-51)

Project Location: 8845 and 8895 High Valley Road, Clearlake Oaks, Ca.

APN: 006-005-04 and 006-005-15

Date: October 5, 2023

Dear Mr. Stockton,

My name is Gerald, (Gerry), Shaul. My cousin, Jane Negri, and I own 160 acres, (APN 006-004-200), adjacent to the Subject Project. As an introduction to my qualifications to comment on this project, it should be noted that my family has owned adjoining parcels since the 1940's and I have been recreating on these parcels since the 1950's. Furthermore, I was employed by the Lake County Public Works Department for 27 years; 18 of those years as the Public Works Director. I am very familiar with the area, as well as the capabilities of the County to maintain High Valley Road, which is the public road that accesses the project.

I have reviewed the Initial Study for the project, and it appears to be thorough in identifying environmental impacts caused by the project, as well as the appropriate mitigation measures.

These impacts and mitigation measures are for the “on-site” impacts, however, the “off-site” impacts and appropriate mitigation measures appear to have been overlooked.

In particular, is the impact on High Valley Road, which we use to access our properties. The study identifies how many vehicle trips will be generated by the project’s employees and the contractors during construction. These trips are then compared to the average daily traffic of State Hwy 20 and deemed “insignificant”. The study fails to identify the current daily traffic on High Valley Road at the project site, (which is an unimproved dirt road), and on High Valley Road on the improved paved section from Brassfield Winery to Hwy 20. I believe that this information may put the project’s traffic impact into the proper perspective.

The study does not identify the months that construction will occur, nor whether the employees work all year, or are seasonal, and, if seasonal, the months they would typically work needs to be identified.

High Valley Road from the project site to the start of paved surfaces is approximately 2.5 miles in distance, consisting of a dirt surface. There are reaches of the stretch of road that have grades in excess of 10%. In the summer, this road has a surface of “powder” that gives “fugitive dust” a whole new meaning due to the magnitude of the dust. In the winter, the road is highly erosive from the surface runoff and is frequently passable only by high clearance, four-wheel drive vehicles.

On the paved portion of High Valley Road at its intersection with Cerrito Drive, is a narrow switchback which requires trucks and parcel vans to use the entire roadway, thus encroaching into the oncoming traffic lane.

With respect to maintaining High Valley Road, the Road Department grades the dirt portion twice a year; preferably in the Spring after the rains when the road has optimum moisture, and in the Fall after the initial rains when the road has optimum moisture. For obvious reasons, the dirt portion of High Valley Road is a low priority and is basically a “proceed at your own risk” roadway.

This year, the road did not get graded until mid-June. The ruts from the Winter weather in the vicinity of the project were so deep and meandering down the road, that it was impassable to a passenger vehicle.

In my experience, it is relatively easy to identify the “problems/issues”, but difficult to identify a practical and workable solution. I am no longer qualified nor empowered to offer mitigation measures for High Valley Road with respect to the project’s impact.

I would encourage the Planning Department, Public Works Department and the applicant to discuss, and hopefully agree, to a workable mitigation. It can be done, as evidenced by the scores of Timber Harvest sales within the Mendocino National Forest, where High Valley Road was used for transporting the harvested timber. Another example is how Brassfield Winery mitigated their impact on the road.

I trust that the off-site environmental impacts will be further identified by the Planning Department and that the mitigation, if any, is incorporated into the Initial Study.

C: Scott DeLeon, Public Works Director

Jane Negri

Janet Miles