

**From:** [Davis, Colin W](#)  
**To:** [Max Stockton](#)  
**Cc:** [Ham, Sateur](#); [Barnitz, Kathryn L](#)  
**Subject:** Re: [EXTERNAL] Request for Review PL-25-71  
**Date:** Tuesday, September 30, 2025 11:02:41 AM  
**Attachments:** [image001.png](#)

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BLM has no comment.

Thank you for your time and the opportunity to comment.

Colin W. Davis  
Assistant Field Manager  
Ukiah Field Office  
2550 N State St, Unit 2  
Ukiah, CA 95482  
Cell: (707) 513-8456  
Desk: (707) 468-4065

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**From:** Max Stockton <Max.Stockton@lakecountyca.gov>  
**Sent:** Tuesday, September 30, 2025 10:51 AM  
**To:** Max Stockton <Max.Stockton@lakecountyca.gov>  
**Subject:** [EXTERNAL] Request for Review PL-25-71

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Hello,

Please find the attached RFR for Major Use Permit PL-25-71.

Please respond no later than October 21, 2025, even if there is no comment.

Here are the attachments as links for your review:

[DMP.pdf](#)  
[HYDROLOGY REPORT-Water Availability Analysis.pdf](#)  
[Biological Resource Study.pdf](#)  
[Biological Resources Assessment.pdf](#)  
[Cultural Resources Study.pdf](#)  
[Oak Replacement.pdf](#)  
[Plant and Wildlife.pdf](#)  
[Site Plans.pdf](#)  
[PMP.pdf](#)

October 16, 2025

Max Stockton  
County of Lake  
Community Development Department  
Planning Division

Re: Major Use Permit PL-25-71  
10750 Seigler Springs North Rd., Kelseyville, CA 95451  
APNs 011-069-48, 115-004-07, 115-004-05, 115-004-01

Dear Max,

Thank you for providing PG&E the opportunity to review your proposed plans for PL-25-71 dated December 13, 2024 and received on September 30, 2025. Our review indicates the proposed work and/or improvements do not appear to directly interfere with any of PG&E's existing facilities or land rights.

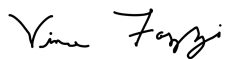
Please note, this is our preliminary review and PG&E may provide additional comments in the future as the project progresses or if additional information is provided. If there are subsequent modifications made to the design, we ask that the plans be resubmitted for review to the email address listed below.

If PG&E gas and/or electric service are needed, please submit an application through PG&E's Your Project Portal: [Sign In \(yourprojects-pge.com\)](https://yourprojects-pge.com).

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of two (2) working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding this response, please contact me at (916) 217-1057 or [Vincent.Fazzi@pge.com](mailto:Vincent.Fazzi@pge.com).

Sincerely,



Vince Fazzi  
Land Management

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California  
Department of Conservation  
Geologic Energy Management Division

Gavin Newsom, Governor  
Jennifer Lucchesi, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/14/2026

**VIA EMAIL**

County of Lake  
Mary Claybon  
255 North Forbes St.  
Lakeport, CA 95453  
[Claybon@lakecountycalifornia.gov](mailto:Claybon@lakecountycalifornia.gov)

Assessor Parcel Number(s): 115-004-05, 115-004-01, 011-069-48, 115-004-08  
Property Owner(s): N/A  
Project Location Address: Diener Drive,  
Kelseyville, CA 95451

PROJECT TITLE: PL-25-71 Pasta Farms 3 / 1833 DS, LLC / Peter Simon

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated 4/9/2026. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (<https://maps.conservation.ca.gov/doggr/wellfinder/>).

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's

advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an

affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link:  
[https://www.conservation.ca.gov/calgem/for\\_operators](https://www.conservation.ca.gov/calgem/for_operators).

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at 916-322-1110 or via email at [CalGEMNorthern@conservation.ca.gov](mailto:CalGEMNorthern@conservation.ca.gov).

Sincerely,

*May Soe*

May Soe  
Supervising Oil and Gas Engineer – Northern District

Enclosure  
cc: N/A

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

<b>API No.</b>	<b>Well Name</b>
No Wells	

**From:** [Vance Ricks](#)  
**To:** [Max Stockton](#)  
**Cc:** [Cara Salmon](#)  
**Subject:** RE: Request for Review PL-25-71  
**Date:** Tuesday, September 30, 2025 12:15:59 PM  
**Attachments:** [image001.png](#)

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As long as the site plan meets CDD requirements, no comments

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**From:** Max Stockton <Max.Stockton@lakecountyca.gov>  
**Sent:** Tuesday, September 30, 2025 11:14 AM  
**To:** Max Stockton <Max.Stockton@lakecountyca.gov>  
**Subject:** RE: Request for Review PL-25-71

Hello,

In the previous email, I inadvertently attached a confidential cultural report. I am unable to recall the specific message, so I kindly ask that you refrain from opening the attachment titled "Cultural Resources Study." I have removed the study from the list below; please disregard the last email and refer only to the link provided here.

Thank you for your attention to this sensitive issue,



*Max Stockton*  
**Associate Planner**  
Department of Community Development  
255 N. Forbes St.  
Lakeport, CA 95453  
Phone: (707) 263-2221 x 38120  
Fax: (707) 263-2225  
Email: [max.stockton@lakecountyca.gov](mailto:max.stockton@lakecountyca.gov)

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**From:** Max Stockton  
**Sent:** Tuesday, September 30, 2025 10:51 AM  
**To:** Max Stockton <[Max.Stockton@lakecountyca.gov](mailto:Max.Stockton@lakecountyca.gov)>  
**Subject:** Request for Review PL-25-71

Hello,

# PL-25-71 Agency Comments

## Air Quality

**LC** **Air Quality** **Public** October 17, 2025 at 1:51 pm

As this project is under the Major Use Permit process, a Major Use Permit evaluation fee is required, and a CALEEMOD maintenance fee is required. The project should run CALEEMOD to determine air quality impacts for construction and operation of the facility. The MUP fee is \$2,500.00. The CALEEMOD fee is \$50.00. These fees are due immediately as part of the review process.

Should construction be approved and permits issued, indirect source fees are required for new construction and remodels. Fees include: \$0.50 per sqft of new /remodeled building space. No new parking is proposed.

Dust controls, both for construction and long term operation are required. Asphaltic paving or alternative durable surfacing/dust control measures are recommended, and chip seal or paving should be required for higher volumes of traffic levels.

Contact the District should any generator be proposed to be utilized for operations of the site.

Air Emissions control systems may require permits. Details are required related to building ventilation, venting to outside air, and air filtration equipment.

Additional comments and requirements may be forthcoming upon receipt of the additional project description details, building ventilation plans, and CALEEMOD results.

Wednesday, November 12th, 2025

**AC** **1833 DS LLC** **Applicant** November 12, 2025 at 2:03 pm


The MUP fee of \$2,500.00, and the CALEEMOD fee of \$50.00 have been paid to the LCAQMD on 11/4/25, receipt number 1450685.

## Caltrans District 1

**DA** **Daniel Gjerde** **Internal** March 18, 2026 at 10:22 am

Caltrans has no comment on this project.  
This project would likely enter State Highway 29 at Deiner Drive, a county road, or, possibly, at State Highway 175 at Salmina Road, a county road.

## Special Districts

 **Lori Baca** **Internal** March 18, 2026 at

Hi Mary! The parcel is outside of Special Districts service area, no comments or concerns from us :) Thanks for checking



Michelle Irace

Public

April 21, 2026 at 10:10 am



### Resource Planning Comments:

Complex Grading Permit required due to the number of trees proposed for removal. Tree replacement plan notes saplings will be planted. This may not be adequate for mitigation, but I will defer to CDFW. Also, need information on water source for watering the trees.

All grading and earthwork would be in compliance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code.

Grading activities must be covered within the CEQA analysis. Preliminary estimates need to be provided. Prior to issuance of permit, professional grading and erosion plans in accordance with Ch 30 need to be submitted.

Monday, May 4th



Jack Smalley

Internal

Please obtain all appropriate building permits as required by California Building code.

Paul Duncan Internal

April 29, 2026 at 3:40 pm

#### Project-specific comments from CAL FIRE

All private roads shall meet standards: Road widths, slopes, surfaces, turnaround areas, gate space requirements, and similar features were not identified in the supplied documents.

All structures shall have defensible space.

#### These are the comments from CAL FIRE for all construction and/or development in the SRA

- The County Chief Building Official, County Community Development Director, County Fire Marshal, or AHJ Designee shall ensure that all Title, Codes, Laws, Regulations, etc. for this project shall be applied that meet the Minimum State Fire Safe Regulations. This is also within the local Fire Protection District's boundary, where they are a coperator in applying and/or enforcing all Codes, laws, regulations, etc. for this project, and they will also have comments.
- Title, Code, Law, Regulation, the AHJ shall apply, summarized from the "Minimum State Fire Safe Regulations" below, to include, but not be limited to:
  - Property line setbacks for structures shall be a minimum of 30 feet. A "Greenhouse / Hoophouse" is a structure.
  - Addressing/Road Signage that is reflective and of contrasting colors from the public roadway to the location, and at every intersection.
  - The size of letters, numbers, and symbols for addresses/road signage shall conform to the standards in the California Fire Code, California
  - Code of Regulations, title 24, part 9.
  - On-site water storage/supply for fire protection of each structure per NFPA 1142 (2017 Edition).
  - Per NFPA 1142, fire suppression water storage tanks for commercial use shall be steel or fiberglass (not plastic).
  - All private property roads/access used for this project shall meet minimum Fire Safe standards for emergency vehicle ingress and egress.
  - A "One Way" 12-foot-wide loop road standard could be used, or a two-lane road. Shall support 75,000 pounds.
  - A "Road" is two 10-foot-wide lanes of travel for a total of 20 feet of drivable surface, not including the shoulders. The "Road" shall support 75,000 pounds.
  - A "Driveway" is a 10-foot-wide road with a turnout every 400 feet. This shall not be used for commercial applications or access to more than three structures that are residences. The "Driveway" shall support 40,000 pounds.
  - A "Turnout" shall be a minimum 10 feet wide and 30 feet long, with a 25-foot taper at each end. A "Turnout" shall support 40,000 pounds.
  - A "One Lane", "One Way" only loop road is 12 feet wide of drivable surface, plus shoulders. A one-lane road must connect to a two-lane road or County Road on both ends. A "One Lane/One Way" shall support 75,000 pounds. Shall access a maximum of 10 residential units. Maximum 5,280 feet long.
  - A bridge can meet the "One Lane", "One Way" 12-foot-wide road standard with appropriate signage. A bridge must be marked by the owner of the bridge to indicate that it is rated to support 75,000 pounds.
  - A bridge shall not be less than 12 feet wide for any use.
  - A bridge can meet the "Road" 20 feet wide standard. A bridge must be marked by the owner of the bridge that is rated to support 75,000 pounds.
  - Existing roadways on private property shall meet, and or be improved to meet "Road" standards.
  - All-weather roadway surfaces shall be rated/engineered for 75,000-pound vehicles, which is the minimum (including bridges).
  - All weather roadway surfaces do not have mud, standing, or flowing water that vehicles must travel through.
  - Maximum roadway slope is 16%. A mitigation of 16.1% to 20% is allowed if paved, concrete, or similar to support the 40,000- or 75,000-pound rating.
  - Gate width is 2 feet wider on each side of any type of road.
  - Driveway 10' wide, 14' wide minimum gate size.
  - One Lane Road 12' wide, 16' wide minimum gate size.
  - Two Lane Road 20' wide, 24' wide minimum gate size.
  - Gate setbacks are a minimum of 30 feet from the edge of the road to the gate.
  - Gates shall have access criteria locks and alike that meet the local Fire Protection District standard "XNOX" (or similar) access program.
  - Parking at the site shall allow for 40-foot radius turnarounds, 60-foot long hammerhead T, or similar.
  - All access types shall have a 13' 6" vertical clearance and 2' of horizontal clearance beyond the edge of the road/shoulder.
  - Driveway 10' wide, 14' wide minimum horizontal clearance.
  - One Lane Road 12' wide, 16' wide minimum horizontal clearance.
  - Two Lane Road 20' wide, 24' wide minimum horizontal clearance.
  - Minimum fuels reduction of 100 feet of defensible space from all structures.
  - Some applications mention that they may have a gasoline generator for backup power when solar is not available. If this is the case, the generator shall be placed at a minimum distance of 10 feet from a noncombustible surface. It shall have a minimum of a 3A-40 BC Fire Extinguisher within a 10-foot radius.
  - If the property will meet the criteria to be, or will be a CERS / CUPA reporting facility/entity to County Environmental Health (or similar AHJ), it shall also comply specifically with PRC42913, requiring 300 feet of defensible space and fuel reduction around structures. In summary, any structure or location that stores hazardous, flammable, or dangerous items shall establish and maintain 300 feet of defensible space/fuel reduction around its radius.
- While not in Title Code, or Regulation, CAL FIRE does support the County of Lake's "Dark Sky Initiative". This standard reduces the incidence of false reporting of vegetation fires at night. False activation of the 911 system puts the community and first responders at risk when it can be avoided.



May 5, 2026

Mary E Claybon, Senior Planner  
Lake County Community Development Department  
Courthouse – 255 North Forbes Street  
Lakeport, CA 95453  
(707) 263-2221  
[mary.claybon@lakecountyca.gov](mailto:mary.claybon@lakecountyca.gov)

Re: Initial Study/Mitigated Negative Declaration (SCH No. 2026040379) – PL-25-71 Pasta Farms 3 / 1833 DS, LLC / Peter Simon

Dear Ms. Claybon:

Thank you for providing the California Department of Cannabis Control (DCC) the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) prepared by Lake County for the proposed Pasta Farms 3 cannabis project (Proposed Project).

DCC has jurisdiction over the issuance of licenses to commercial cannabis businesses. DCC may issue a cultivation license to a business that meets all licensing requirements, and where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012(a).) All commercial cannabis businesses within California require a license from DCC. For more information pertaining to commercial cannabis business license requirements, including DCC regulations, please visit: <https://cannabis.ca.gov/cannabis-laws/dcc-regulations/>.

DCC expects to be a Responsible Agency for this project under the California Environmental Quality Act (CEQA) because the project will need to obtain one or more annual cultivation licenses from DCC. In order to ensure that the amended IS/MND is sufficient for DCC's needs at that time, DCC requests that a copy of the document, revised to respond to the comments provided in this letter, and a signed Notice of Determination be provided to the applicant, so the applicant can include them with the application package it submits to DCC. This should apply not only to this Project, but to all future CEQA documents related to cannabis business applications in Lake County.

DCC offers the following comments concerning the IS/MND.

## **General Comments (GCs)**

### **GC 1: Acknowledgement of DCC Regulations**

The IS/MND does not acknowledge that the project would require one or more cannabis cultivation licenses from DCC. The document could be improved if it acknowledged that DCC is responsible for licensing, regulation, and enforcement of commercial cannabis business activities, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and DCC regulations related to cannabis cultivation and distribution (Bus. & Prof. Code, § 26012(a)).

### **GC 2: Evaluation of Cumulative Impacts**

It is important for CEQA analysis to consider the cumulative impacts of commercial cannabis business activities in Lake County. Of particular importance are topics for which the impacts of individual projects may be less than significant, but where individual projects may make a considerable contribution to a significant cumulative impact. These topics include, but are not limited to:

- cumulative impacts from groundwater diversions on the health of the underlying aquifer, including impacts on other users and impacts on stream-related resources connected to the aquifer;
- cumulative impacts related to noise;
- cumulative impacts related to transportation; and
- cumulative impacts related to air quality and objectionable odors.

The IS/MND would be improved by acknowledging and analyzing the potential for cumulative impacts resulting from the Project coupled with other commercial cannabis business projects being processed by the County and any other reasonably foreseeable projects in Lake County that could contribute to cumulative impacts similar to those of the Project.

### **GC 3: Site-Specific Reports and Studies**

The IS/MND references several project-specific plans, studies, and reports, including a Property Management Plan; Site Management Plan, Nitrogen Management Plan; SWRCB Notice of Applicability; and Storm Water Management Plan; To ensure that DCC has supporting documentation for the IS/MND, DCC requests that the County advise applicants to provide copies of all project-specific plans and supporting documentation with their state application package for an annual cultivation license to DCC.

## **Specific Comments and Recommendations**

In addition to the general comments provide above, DCC provides the following specific comments regarding the analysis in the IS/MND.

THIS SPACE INTENDED TO BE LEFT BLANK

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
1	N/A	11	Project Description	The IS/MND could be more informative if it provided the permit(s) or approval(s) required from each of the agencies required for cannabis cultivation.
2	IV, VII, X, and XVII	Bio Resources 24, 27, 29  Geology and Soils 34, 36, 37  Hydrology and Water Quality 44, 47  Transportation 57, 58	General Mitigation	<ul style="list-style-type: none"> <li>• The impact analysis and the impact statement for Biological Resources item (b) indicates that impacts would be “Less Than Significant Impact”. However, the checkbox indicates that there would be “Less than significant impact with mitigation.” The text, impact statement, and checkbox should be made consistent.</li> <li>• The impact analysis and the impact statement for Biological Resources item (e) indicates that impacts would be “Less than significant impact with mitigation”. However, the checkbox indicates that there would be “Less than significant impact.”</li> <li>• The impact analysis and the impact statement for Geology and Soils item (d) indicates that impacts would be “No impact”. However, the checkbox indicates that there would be “Less than significant impact.”</li> <li>• The impact analysis and the impact statement for Geology and Soils item (f) indicates that impacts would be “Less than significant with mitigation incorporated”. However, the checkbox indicates that there would be “Less than significant impact.”</li> <li>• The impact analysis and the impact statement for Hydrology and Water Quality item (c) indicates that impacts would be “Less than significant ”. However, the checkbox indicates that there would be “Less than significant impact with mitigation measures.”</li> </ul>

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
				<ul style="list-style-type: none"> <li>The impact analysis and the impact statement for Transportation item (c and d) indicates that impacts would be “Less than significant ”. However, the checkbox indicates that there would be “No impact.”</li> <li>In all instances above the text, impact statement, and checkbox should be made consistent.</li> </ul>
3	N/A	N/A	General Comment	The IS/MND would be more informative if it provided a list of the best management practices that would be employed, and an analysis of how those best management practices would reduce potential impacts to less than significant levels.
4	I.	14-17	Aesthetics	The IS/MND would be improved if it referenced DCC’s requirements that all outdoor lighting for security purposes must be shielded and downward facing, and that lights used in mixed-light cultivation activities must be fully shielded from sunset to sunrise to avoid nighttime glare (Cal. Code Regs., tit. 4 §§ 16304 (6) and (7)).
5	III.	19-23	Air Quality	The IS/MND would be improved if it provided a description or summary of proposed operation equipment that is anticipated to generate air pollutant emissions, including ROG, NOx, PM10, and PM2.5, and provided estimates of such emissions.
6	III.	19-23	Air Quality	The analysis of air quality impacts and proposed mitigation measures would be improved if it evaluated the pollutant emissions associated with operation of the Proposed Project, disclosed the relevant air quality management plan for the project site, and disclosed the air emissions significance threshold(s), against which the impacts of the project are compared.

<b>Comment No.</b>	<b>Section Nos.</b>	<b>Page No(s).</b>	<b>Resource Topic(s)</b>	<b>DCC Comments and Recommendations</b>
7	IV	24-29	Biological Resources	The IS/MND could be improved by providing additional detail regarding the environmental setting for biological resources at the project site and impact conclusions regarding individual species and habitats. It appears that this detail may be included in the Biological Assessment prepared for the Proposed Project. To ensure that DCC has supporting documentation for the IS/MND, DCC requests that the City advise the applicant to provide a copy of the Biological Assessment with its state application package for an annual cultivation license to DCC.
8	IV	24-29	Biological Resources	The IS/MND would be improved if it provided an analysis of potential impacts to biological impacts resulting from the Proposed Projects operations. This could include an analysis of impacts resulting from increased light, noise, vehicles, or heavy machinery.
9	V	30-32	Cultural	The IS/MND could be improved by including the following mitigation:  “Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for California Register of Historical Resources Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources.”
10	X	44-50	Hydrology and Water Quality	The IS/MND could be more informative if it described some of the construction stormwater management measures as well

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
				post-construction controls included in the Stormwater Management and Pesticide Management Plans.
11	X	44-50	Hydrology and Water Quality	The IS/MND could be improved if it noted that applicants are required to provide a final copy of proof of a lake and streambed alteration agreement issued by CDFW or written verification that an agreement is not needed. (Cal. Code Regs., tit. 4 § 15011(a)(8).)
12	N/A	N/A	Cumulative Impacts	The IS/MND could be more informative if it identified whether any other cannabis growing operations exist or have been proposed in the vicinity of the Proposed Project, and whether the Proposed Project could make a considerable contribution to any cumulative impacts from these other projects.

## Conclusion

DCC appreciates the opportunity to provide comments on the IS/MND for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Lindsay Rains, Environmental Program Manager I, at (916)-251-4607 or via e-mail at [Lindsay.Rains@cannabis.ca.gov](mailto:Lindsay.Rains@cannabis.ca.gov).

Sincerely,

Lindsay Rains  
Licensing Program Manager