

Dear Chair Sabatier, Supervisors:

Thank you for taking the time to read my opposition to Highland Farms, LP Major Use Permit Project to be discussed Tuesday August 13 under Item 6.3 PUBLIC HEARING - Consideration of Appeal (AB 24-02) of Planning Commission's Approval of Major Use Permit (UP 20-96), Highland Farms, LP/Autumn Karcey; Located at 7508, 7522, 7634, & 7746

Highland Springs Road and 7257 & 7357 Amber Ridge Road in Lakeport, CA. (APNs 007-006-27, 34, 35, 40, 41, and 007-057-02); Appellant Tom Lajcik and Margaux Kambara and Associates

I read the 73 page CEQA Initial Study and Mitigated Declaration for this proposed project with disbelief. So many key areas were called 'not significant' when in fact, this proposed project violates numerous local, State and Federal laws and regulations.

Once again residents of Lake County are faced with having to express our outrage at another enormous cannabis project that is moving forward in spite of the potential for environmental and cumulative impacts to our community.

Highland Springs is a beautiful part of the county, but it's pretty much been left to fend for itself in terms of safety and fuel reduction management. The area receives little Law Enforcement patrol, the park has been left unmonitored for almost a year, which has left our neighborhood with intense anxiety about the potential for a devastating fire.

Biology: As a biologist who once performed field studies for both CDFW and USFW, I found the 'biology' conducted to support this project meager at best. This is a sensitive environmental area, a serpentine-rich ecosystem, with numerous endemic plants which were disregarded in this report even though the serpentine soils are well -documented through the County's own parcel overlay program. Plants which only exist on serpentine soils were identified, which should have been a clue to whoever was conducting the report and required species surveys not performed.

Ironically, one of the crossroads of this project is called Vernal Road, which I can only assume is named for vernal pools in the area. Vernal pools have been destroyed in over 90% of their natural habitats making them increasingly rare. These ephemeral pools are home to rare and endemic plants, and can only be detected at specific times of the year. This proposal failed to account for that or perform a wetland delineation survey in the area their biologist even identified as 'potential wetland.'

Page 29 states "Mitigation Measure Bio-1 would avoid potential impacts to nesting birds by requiring a pre-construction nesting bird survey and then establishing a 'disturbance-free buffer' around active nests." Research has shown that habitat disruption at that level would likely result in nest abandonment. The report also cavalierly dismisses any impacts to migrating birds and foraging behavior that might be caused by this significant habitat disruption.

County Property v. Private Property Access: This project relies on access over 1057 feet of County land to get to their leased land. This park is public land and has a wonderful trail system which has been maintained by diligent volunteers and are heavily used by hikers, bikers, and riders. It's impossible to believe a development of this size won't generate hazards and safety issues. By law, cannabis cultivation is disallowed within legal limits of public lands which this proposal violates. In

spite of that, this project requires this access, but this access doesn't exist, and was incorrectly stated by one of our own County Planners. This oversight is key and should have curtailed the progress of this proposal. The lack of easement should be enough cause to dismiss this project. A prescriptive easement cannot be claimed either, as prescriptive relies on historical usage of the easement which is a threshold this clearly does not meet.

Traffic: The sheer amount of traffic this multi-year project intends to bring to the Highland Springs area is terrifying. The amount of traffic this project will generate on our already overtaxed road is insane. There's already almost no patrol out here, how will our already impacted LE agencies be able to ensure safety out here?

Environmental Degradation: The proposed development and 'improvements' will disturb over 100,000 cubic yards of material, releasing cancer causing asbestos particles from disrupted serpentine soils as well as degrading the landscape. The mere fact that this proposal ignores the high-potential for asbestos should be concerning enough to call a halt.

Fire: Imagine numerous large construction trucks and heavy equipment on trailers, driving an unpaved road through dry terrain and tell me that doesn't scream fire danger. One dragging chain, one cigarette, multiplied many-fold.

Dark Skies: Our dark skies we're so proud of, the dark skies that are lacking from so many other places in California. The sheer number of generators this proposal indicates is not only a dark sky hazard, but an incredible noise hazard to any wildlife in the area. Page 19 of the CEQA report states 'the Proposed Project would create a new source of light through security and facility lighting.....' however, the amount of generated light would not be considered substantial. Furthermore, residences in the vicinity would likely 'not likely be affected' due to their distance....

This type of comment 'would not likely be affected' was used throughout the report. Not likely? It also states that the nearest residence is 'approximately 0.4 miles northwest of the Project site boundary! Would you like to be that 0.4 mile away residence? Those owners would never be able to sell their home. Who would buy it?

Cumulative Effects of Multiple Cannabis Operations: The County is responsible to its citizens to mitigate cumulative effects of multiple cannabis operations. The impacts of this project alone are staggering. Who will monitor this out of sight, out of mind project? We can already drive by a similar project in downtown Kelseyville to see workers showering outside with hoses, living in cramped unapproved quarters as it is.

But most of all, we're tired. Our neighborhoods are tired.

Our neighbors met to talk about this and we're all afraid, frustrated, and tired. We're afraid of the negative consequences to our land, to our neighborhoods, to our safety. We're tired of trying to contribute to our community, only to see its best interests upended when a for-profit entity once again comes in with huge plans that will result in them making money while leaving our community to deal with the environmental fall-out. It only takes a cursory Google search to see where the interests of the applicants lie. It isn't with Lake County. The applicants of this project don't even

own the land; they are leasing it. It's an opportunistic scenario rather than an investment in our community. When it works for them, good, and when it doesn't, they will leave and leave the scars on our land behind them like too many other failed cannabis operators have done in the past. Yes, this brings tax dollars but at what price? We all want our community to thrive, but can it be other than all-cannabis all the time?

Our very own thoughtful County Vision 2028 states 'Consider and promote the well-being and economic resilience of every Lake County resident.'

It does not state 'promote the capricious commercial economic opportunities of non-residents of Lake County at the expense of residents.'

Sincerely,

Michelle Scully