

Lake County Clerk of the Board

From: Redbud Audubon <redbud.audubon@gmail.com>
Sent: Friday, August 9, 2024 1:09 PM
To: Lake County Clerk of the Board
Subject: [EXTERNAL] HIGHLAND SPRINGS FARMS AB 24092

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August 9, 2024

The project reports are incomplete and inaccurately presented.

The wetlands everywhere on the parcels have not been identified and special-status plants onsite and habitat for foothill yellow-legged frog disregarded.

These findings alone are facts to deny the project.

The original consultants, Pinecrest Biological Consulting, pointed out the critical habitat and yet no wetland delineation was never completed. This is unacceptable.

The construction plans clearly show cultivation occurring all over the site, and is interspersed with potential wetlands and watercourses, and in fact it shows cultivation on top of areas PEC identified as potential wetlands in Figures 4 and 5.

There absolutely needs to be a protocol-level wetland delineation performed according to US Army Corps of Engineers standards and this should be conducted during the appropriate time of year.

It seems difficult to argue that no sediment would enter any watercourses or wetlands based on the site plans.

PEC's biologist, DiVittorio, was never shown any construction plans, and was led to believe the project as being limited to a few greenhouses in the corner of the property near the existing house pad, not removing trees, and not crossing any watercourses.

This site needs a CEQA-level BA done (not reconnaissance level) based on the impacts to plants, wildlife (including foothill yellow-legged frog habitat) watercourses and wetlands that have not been acknowledged. Sufficient time has passed since the surveys (PEC and AES) that a new round of plant surveys is needed.

The proposed project is on the edge of wilderness - not an agricultural conversion - and reports identify serpentine soils, special-status plants, and habitat for special-status animals onsite.

The plans also show impacts to watercourses, and this requires reanalysis of sediment impacts as well. We would like to share the following email information as impacts to the endangered hitch was not focused on, which I brought up in the Planning Commission Hearing but was not addressed. This is a very large grow operation proposed between Manning and Thompson Creeks, with potential impacts to Clear Lake hitch. CDD used a Negative Declaration: <https://ceqanet.opr.ca.gov/2023050420/4>, which is illegal if there are potential impacts to hitch (Chi) we believe.

Thank you,

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