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Response to items listed in “We Grow Farms” Project Initial Study (IS 25-20) located at 16750 Herrington Road, Middletown, California (APNs: 013-060-40, 013-014-03,11):

1. The Site Plan prepared by Lake County Planning Consultants does not include all the Site Plan requirements set forth in the *Commercial Cannabis Cultivation Application Package*, Lake County Community Development Department, March, 2018, Appendix H. Such as, distance measurements to surrounding residences and topography for the site and surrounding area. Building elevations and peak building heights should be provided to evaluate view impacts for surrounding properties. A eight foot fence will not be effective to screen visual impacts for properties 200 ft to 300 ft in elevation above the proposed development site (such as for residential parcels along Tinilyn Dr, Jaclyn Dr, and/or Nicholas Way).

2. (IV.a) Biological Resource Assessment (prepared by Pinecrest Environmental Consulting, March 1, 2020) did not include seasonal surveys. The IS requests one seasonal survey be completed prior to the public hearing to mitigate any negative impacts. However, this was not completed. Typically, biologists complete three to four seasonal surveys to adequately assess the potential for listed sensitive plant and animal species with the last scheduled in May or June of each calendar year. One seasonal survey will not adequately assess the potential for sensitive plants and animals that may be present on-site nor will it be able to advise on appropriate mitigation measures.

Biology reports for properties 5000 ft – 6000 ft away that identified habitat and found specimens for several sensitive species that Pinecrest Biological Consulting stated had little to no potential of occurrence. In addition, the Biological Assessment, Appendix A table evaluating the possibility for special status species appears to contradict the findings of the assessment, including:

a. The report text appears to indicate the development area is chaparral habitat, however the table in Appendix A repeatedly states that no (or no suitable) chaparral habitat exists on-site.

b. The report text concludes that there are several potential wetlands, but the table in Appendix A repeatedly states that no (or no suitable) wetland exists on-site.

3. (IV.b) The Biological Assessment did not include a habitat map or delineate the survey area.

4. (IV.c) The Biological Assessment notes a potential wetland but does not evaluate the vegetation or collect wetland sample points to determine if it meets the legal definition of wetland and complete wetland delineation procedures.

5. (X.a) No detail was found on recommended BMPs for erosion/stormwater handling, or for the existing retention basin (dimensions, construction, overflow) or hydrology analysis to show that it has adequate capacity for peak flow rates.

6. (X.b) The Water Availability Analysis (WAA) request is for a four-hour pump test with one-hour of recovery. This is not adequate to evaluate the impacts of this development on surrounding water resources. A full water availability analysis that considers, in part, existing and future water use, available well reports, recharge and water balance modeling.

7. (XI.b) The Middletown Area Plan (prepared by the Lake County Community Development Department) depicts a Coyote Valley Community Growth Boundary (CGB) that uses 2007/2008 data. The Middletown Area Plan also indicates that the CGB is expected to be valid for 10 to 15 years and that the boundaries should be reassessed once 85% of the area within the CGB has been developed. Given that the subject site overlaps a portion of the 1000 ft buffer around the CGB, it should be determined whether the CGB is accurate for current land use conditions.

8. (XVII.b) This section notes Post-Construction trips to be 40-80 per day, but intro states 20-40 trips. Lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, but assumptions and methods should be documented and explained in the environmental document. It seems necessary to evaluate starting point for vehicle trips and whether labor is planned to be from within or outside the County.