

**Andrew Amelung**

---

**From:** ljdk2007@aol.com  
**Sent:** Wednesday, March 13, 2024 6:27 PM  
**To:** Eddie Crandell; Dist1 PlanningComm; Dist2 PlanningComm; Dist3 PlanningComm; Dist4 PlanningComm; Dist5 PlanningComm; Andrew Amelung; Lake County Community Development  
**Subject:** [EXTERNAL] Fw: Public Comment Letter UP 20-33  
**Attachments:** road.jpg

I oppose Major Use Permit (UP 20-33)

I am very concerned that there will be no supervision over this project, much like the SourzHVR project, and any complaints that we might file will be ignored and overlooked. What we endured with SourzHVR was unacceptable, to say the least. As you recall SourzHVR was supposed to be the largest grow in the region. They violated their early activation permit, graded the property without proper permits, they rerouted Schindler Creek and had several Fish and Game fines, they left without paying taxes, and now the new owners are left to pay the fines and repair the damage left behind. The destruction, disruption, and disrespect of High Valley and its residents has left us angry and traumatized.

There are several grow projects in the same area seeking approval and the condition of the road needs to be addressed. Additionally, the safety of the residents who reside in the valley must be taken into consideration.

High Valley Road is in very poor shape. Our valley road has become a freeway, especially with all the traffic and the semi trucks coming from the winery. There is a lot of traffic added to High Valley Road since it is one way into the National Forrest and I think this should be considered as well. Over the years, especially during the SourzHVR project, delivery trucks and semis have been stalled on High Valley Road which caused the residents to be stuck in the valley since there is only one way in and out.

We use to enjoy walking, jogging, riding horses and bikes, etc., but it has become too dangerous to enjoy. Even stopping to pick up trash that has been dumped on the side of the road is treacherous. It should be noted that we have waited since the 80's to have High Valley Road repaired and during those years the valley residents would fill in the potholes and do our best to keep up the road. We finally received a half way decent road (re-chipsealed in 2021) and then PG&E came in and destroyed it. High Valley Road is not a paved road but rather a gravel road that has been patched and chipsealed. It was a small road built for a few farmers that resided in the valley and was never intended for such heavy use. The sides of the road are crumbling due to the large trucks and these metal plates they are putting on the road are not level and its causing people to swerve into the other lane to avoid them. It is dangerous! Not to mention the flooding that happens in the winter. During heavy rains in the winter the entire first straightaway is under water. Its can take days or even weeks for the water to recede.

In reading the guidelines for approval, I do not agree with the findings for #3 as noted below. It is not adequate to safely accommodate the proposed use. This project is not suitable for our valley community and I oppose the major use permit of this and the other projects in the works.

Approve Major Use Permit UP 20-33 with the following findings:

1. That the establishment, maintenance, or operation of the use applied for will not under the circumstances, be detrimental to the health, safety, morals, comfort and general welfare of the persons residing or working in the neighborhood of such proposed use or be detrimental to property and improvements in the neighborhood or the general welfare of the County.
2. The site is adequate in size, shape, locations, and physical characteristics to accommodate the type of use and level of development proposed.
3. The streets, highways and pedestrian facilities are reasonably adequate to safely accommodate the proposed use.

This is a picture of High Valley Road during this last storm.

135-61-2

10/1/2000

Thank you  
Lori





6b  
3-14-24

**Amaia Hammack**

**From:** Maria Kann <mariackann@gmail.com>  
**Sent:** Wednesday, March 13, 2024 6:15 PM  
**To:** Maria Kann  
**Subject:** [EXTERNAL] Public Comment Letter to Oppose UP 20-33 Planning Commission 3/14/24

To our distinguished Planning Commission Members, Board of Supervisors, and Public Servants et al,

I am writing to voice my vehement opposition to the proposed cannabis projects slated for locations on High Valley Road in Clearlake Oaks and request to deny these and all future proposals that require access through High Valley:

- UP 20-33 Liu Farms 8531 High Valley Road
- UP 21-30 Hypnotic Farms 9119 High Valley Road
- UP 21-49 Lemon Glow 8845 High Valley Road
- UP 23-09 Poverty Flats Ranch 10535 High Valley Road
- And
- UP 20-21 High Valley Oaks 9850 High Valley Road (approved)

My lifelong dream has been to own a home on acreage in the country far away from the noise and activity of industry so I can enjoy a peaceful, quiet lifestyle in tune with the sounds and rhythms of nature. I achieved my dream in September 2000 when I purchased my 10-acre parcel at 12250 High Valley Road in Clearlake Oaks, California. Brassfield's vineyard development started in 2001 and has grown substantially, generating an influx of activity and traffic in our shared valley that brings with it a set of problems that will only get worse with the approval of cannabis operations. The impact to the residents of High Valley will be intolerable and unacceptable.

The Liu Farms operations would occur up to **six days per week from May through November** for outdoor cultivation. Nursery operations would occur **year-round**. The operation hours would be **Monday through Saturday** during daylight hours from approximately **5:00 a.m. to 4 p.m.** The Lake County Zoning Ordinance restricts **deliveries and pickups to 9:00 a.m. to 7 p.m., Monday - Saturday, and Sunday from 12 noon to 5:00 p.m.** Cultivation would occur for approximately **270 days annually** and the permit will be issued for **10 years!**

**“Employees and Daily Trips:** Once operational, the proposed Project would staff approximately sixteen (16) employees, March through November, with peak employee usage during peak seasonal events, such as planting and harvesting. Liu Farm expects sixteen (16) work trucks from employees coming to and from the project, for as many as **32 trips per day from employees**. Weekly truck deliveries of various project-related material would occur throughout the season. For the purposes of this document, a conservative estimate of **one (1) delivery trip per day** is used. Therefore, during peak seasonal events, as many as **33 trips per day** could occur as a result of the Project.” **That’s 33 trips per day for 6 days for the next 10 years on top of the already excessive traffic associated with Brassfields Winery and the recently approved UP 20-21.**

There are seven proposed cultivation sites each with 866 proposed raised planter bags with an additional cultivation site included for possible future expansion. Within this 7 acre canopy area will be 6,062 planter bags of cannabis and they estimate a staff of 16 employees; that translates to each person being responsible for 378 plants. I highly doubt their numbers are accurate and, like Sourz, they will have far more workers than they are proposing.

The owner(s) of Liu Farms is not a resident of High Valley. They may own property but they do not live here and share our values and way of life. Therefore, they don't appreciate and respect the serenity and natural beauty of High Valley and the solitude, privacy, and lifestyle of its residents. These operations do not belong in our small valley community.

May I remind you of a little High Valley history:

The property owners and residents of High Valley have already directly experienced the complete disruption and disregard for our quiet, rural community and way of life by the cannabis industry and our own county government in 2021. SourzHVR left a bad taste in our mouths when they came into our valley with their around-the-clock operation that brought to our home unacceptable levels of noise, dust, trash, traffic blockages and congestion, undesirable elements in unregistered vehicles, outright lies, complete disregard of our complaints, and destruction to the natural beauty and wildlife. The county was actively pushing their project through in violation of multiple laws, aspects of the project plan, and

our rights as affected citizens. The property owners and residents **DO NOT WANT** additional industrial businesses approved in High Valley. Brassfield Winery is a large operation that currently produces a high volume of traffic, noise, pollution, and trash from careless motorists and work vehicles. Many of the non-resident workers drive way too fast and pose a risk to those of us who walk our dogs on the only road we have. We are forced to step into the ditch to avoid vehicles because there are no sidewalks on our one-lane road. Several intoxicated drivers have crashed through fences and damaged private property. High Valley Road is not designed to handle your Field of Dreams activity and the property owners and residents of High Valley do not want our peaceful valley stolen from us and handed over to non-residents for the sake of a few tax dollars.

By now the county should have plenty of data to show how these out-of-county large-scale operations affect the community and our county resources. They take over an area, tear up the land, take the bounty, destroy the community, then abandon the property, leaving a wake of destruction and neglected guard dogs in their paths (e.g. SourzHVR). Our shelters and streets are full of abandoned, unaltered, unlicensed, unclaimed large-breed dogs that are egregiously used and discarded like trash after the cannabis operations are complete. These are living, breathing creatures whose lives are not considered or taken responsibility for by a designated human being in these organizations. This is one of the many things that need to change with the permitting process.

We are done with this invasion of our home. We don't want it here and our rights as property owners and citizens will not be trampled upon again. We will be heard and we will fight to the end, like we did before, to preserve our quiet, country life.

Please deny UP 20-33 and respect the wishes of the people who will be directly affected by these self-serving operations.

Respectfully yours,

Maria Kann  
Property-Owner

Lake County

6b  
3-14-24

- Home
- Meetings

Sign In  ▼

Email [Sign In](#)  
email address...

[Forgot your password?](#)

Password  
password...

or, Sign In with:

[Connect](#)

[Sign Up](#)

## Lake County

### Meeting: [Planning Commission on 2024-03-14 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.](#)

Meeting Time: March 14, 2024 at 9:00am PDT

#### Disclaimer:

Your comments and information will become part of the official public record. If you do not want your personal information included in the official record, do not complete that field. If a comment is submitted after the meeting begins, it may not be read during the meeting but will become a part of the record. Any comments with inappropriate language will be deleted.

#### Agenda Item

**6b. 24-212PUBLIC HEARING - Consideration of proposed Major Use Permit (UP 20-33), and Mitigated Negative Declaration (IS 20-39), for cultivation of 304,710-sf of outdoor commercial cannabis canopy; Applicant: Meili Liu/Liu Farms; Located: 8531 High Valley Road, Clearlake Oaks (APN: 006-003-34)**

[Legislation Text](#) [Project Site Plans](#) [Draft Conditions of Approval](#) [Property Management Plan](#) [Initial Study](#) [Hydrology Report](#) [Drought Management Plan](#) [Wetland Delineation](#) [Agency Comments](#) [Public Comments](#) [Staff Report](#)

If you are a human, ignore this field

Select a Position:  Oppose  Neutral  Support

//

2500 of 2500 characters remaining

[Submit Comment](#)

5 Public Comments



[Stephanie Mulder](#) at March 14, 2024 at 7:10am PDT

Oppose

The odor from the plants is offensive. The additional traffic for a cannabis farm that size is going to put more wear and tear on our already stressed roads. On top of that it is going to bring a criminal element into our valley.



[Denise OrpustanLove](#) at March 13, 2024 at 9:25pm PDT

Oppose

As a 4th generation tax paying Lake County resident, whose 300 acre ranch, is adjacent to this proposed project, I urge you to carefully read and review the comments submitted here by Brian Hall. The extreme wildfire risk is one of the many reasons, if not the greatest reason, to oppose this project. The residents of Lake County and our beautiful county, that have suffered so much loss from wildfires, as well as the first responders and fire fighting personnel who risk their lives to protect us, deserve the due diligence of a thorough review of the many errors and severe risks of this project.



[Lori Correia](#) at March 13, 2024 at 6:33pm PDT

Oppose

I agree with Maria Kann and Brian Hall and oppose UP 20-33. Our valley and High Valley Road cannot handle any more traffic or congestion than we already have. Please deny this use permit.



[BRIAN HALL](#) at March 13, 2024 at 4:42pm PDT

Oppose

I have many concerns with this project.

The 0.5 megawatt photovoltaic system will be constructed on a 3,000 ft ridge within the Mendocino National Forest boundary above the town of Lucerne. The system will cover aprx 1.5 acres (not 0.4 acres as shown) and will generate enough power to supply 90 homes. The wildfire risk with a PV system of this

size and in this location should have been considered in the CEQA process. However, the initial study indicates that wildfire and energy impacts were not considered for this project. Of particular concern is the wildfire risk to the home on the neighboring property 1,000 ft east of the site. If a fire were to break out at the PV system location with the prevailing west wind, the driveway access to High Valley Road for this property would be blocked in seconds. On the other hand, a strong east wind (typical of red flag conditions) would push the fire down to Lucerne.

The project lists 8 acres of canopy (although 13 acres is drawn), 42 buildings, 1500 solar modules, (13) water tanks and (16) parking spaces but states there will be no grading or permitted buildings. Clearly, there will be grading and all buildings, other than agricultural storage and residential accessory buildings (tool sheds and playhouses), must have building permits. The initial study states "The County's issuance of the required permits (grading and building) triggers the need for compliance with the California Environmental Quality Act (CEQA)". Therefore, by not requiring grading and building permits, the project avoids the need to comply with CEQA. It appears that a design goal for this project was to avoid grading and building permits for this reason. This includes Calfire access requirements which are critical considering the significant wildfire risk. Top heavy 10' x 10' processing "sheds" with electrical connections and no foundations will be subjected to very high winds in a very high fire risk area. The absence of permitted buildings also means that none of the buildings can be occupied by people/employees. There will be no safe shelter during major wind or rain storms and no place for staff to reside and monitor the PV system or bank of generators.

This project should be denied based on the extreme wildfire risk, lack of environmental studies regarding the photovoltaic system and the unwillingness to obtain grading permits, building permits and the additional safeguards their issuance provides.



[Maria Kann](#) at March 13, 2024 at 3:10pm PDT  
Oppose

I oppose UP 20-33. The impact to the residents of High Valley will be intolerable and unacceptable. Liu Farms will operate Mon-Sat 5 am-4 pm from May through Nov with a year-round nursery. Cultivation would occur for approximately 270 days annually and the permit will be issued for 10 years! They expect to have 16 employees, March - November and 16 work trucks coming to and from the project, for as many as 32 trips per day from employees with a minimum of one daily truck delivery throughout the season. Add that to the already excessive traffic associated with Brassfields Winery and whatever the recently approved UP 20-21 requires.

Liu Farms is not a resident of Lake County They may own property but they do not live here and share our values and way of life. Non-residents don't appreciate and respect the serenity and natural beauty of High Valley and the solitude, privacy, and lifestyle of its residents. These operations do not belong in our small valley community.

The property owners and residents of High Valley have already experienced the complete disruption and disregard for our quiet, rural community and way of life by the cannabis industry and our own county government. SourzHVR left a bad taste in our mouths when they came into our valley with their around-the-clock operation that brought to our home unacceptable levels of noise, dust, trash, traffic congestion, undesirable elements in unregistered vehicles, outright lies, complete disregard of our complaints, and destruction to the natural beauty and wildlife. The county was actively pushing their project through in violation of multiple laws, aspects of the project plan, and our rights as affected citizens. We DO NOT WANT additional industrial businesses approved in High Valley. Brassfield Winery is a large operation that currently produces a high volume of traffic, noise, pollution, and trash from careless motorists and work vehicles. Non-residents drive way too fast and pose a risk to those of us who walk our dogs on the

only road we have. We are forced to step into the ditch to avoid vehicles because there are no sidewalks on our one-lane road. Several intoxicated drivers have crashed through fences and damaged private property. High Valley Road is not designed to handle your Field of Dreams activity and the property owners and residents of High Valley do not want our peaceful valley stolen from us and handed over to non-residents for the sake of a few tax dollars.

Deny up 20-33.

- [Terms and Conditions](#)
- [Privacy Policy](#)
- [Support](#)
- powered by [SpeakUp](#)
- © 2024 Granicus

**Ruby Mitts**

**From:** noreply@granicusideas.com  
**Sent:** Wednesday, March 13, 2024 3:10 PM  
**To:** jhh2358@yahoo.com; everardo2797@gmail.com; eaglebrown19@gmail.com; christina.nexthome@gmail.com; fieldmaile@gmail.com; Ruby Mitts; Mireya Turner  
**Subject:** [EXTERNAL] New eComment for Planning Commission on 2024-03-14 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Lake County

**New eComment for Planning Commission on 2024-03-14 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.**

Maria Kann submitted a new eComment.

Meeting: Planning Commission on 2024-03-14 9:00 AM - Please see agenda for public participation information and eComment submission on any agenda item.

Item: 6b: 24-212PUBLIC HEARING - Consideration of proposed Major Use Permit (UP 20-33), and Mitigated Negative Declaration (IS 20-39), for cultivation of 304 710-sf of outdoor commercial cannabis canopy; Applicant: Meili Liu/Liu Farms; Located: 8531 High Valley Road, Clearlake Oaks (APN: 006-003-34)

eComment: I oppose UP 20-33. The impact to the residents of High Valley will be intolerable and unacceptable. Liu Farms will operate Mon-Sat 5 am-4 pm from May through Nov with a year-round nursery. Cultivation would occur for approximately 270 days annually and the permit will be issued for 10 years! They expect to have 16 employees, March - November and 16 work trucks coming to and from the project, for as many as 32 trips per day from employees with a minimum of one daily truck delivery throughout the season. Add that to the already excessive traffic associated with Brassfields Winery and whatever the recently approved UP 20-21 requires. Liu Farms is not a resident of Lake County. They may own property but they do not live here and share our values and way of life. Non-residents don't appreciate and respect the serenity and natural beauty of High Valley and the solitude, privacy, and lifestyle of its residents. These operations do not belong in our small valley community. The property owners and residents of High Valley have already experienced the complete disruption and disregard for our quiet, rural community and way of life by the cannabis industry and our own county government. SourzHVR left a bad taste in our mouths when they came into our valley with their around-the-clock operation that brought to our home unacceptable levels of noise, dust, trash, traffic congestion, undesirable elements in unregistered vehicles, outright lies, complete disregard of our complaints, and destruction to the natural beauty and wildlife. The county was actively

pushing their project through in violation of multiple laws, aspects of the project plan, and our rights as affected citizens. We DO NOT WANT additional industrial businesses approved in High Valley. Brassfield Winery is a large operation that currently produces a high volume of traffic, noise, pollution, and trash from careless motorists and work vehicles. Non-residents drive way too fast and pose a risk to those of us who walk our dogs on the only road we have. We are forced to step into the ditch to avoid vehicles because there are no sidewalks on our one-lane road. Several intoxicated drivers have crashed through fences and damaged private property. High Valley Road is not designed to handle your Field of Dreams activity and the property owners and residents of High Valley do not want our peaceful valley stolen from us and handed over to non-residents for the sake of a few tax dollars. Deny up 20-33.

[View and Analyze eComments](#)

This email was sent from <https://lakecounty.granicusideas.com>

[Unsubscribe](#) from future mailings



## COMMENTS REGARDING THE LIU FARMS CCC PROJECT UP 20-33

I have many concerns with this project.

### 0.5 Megawatt Photovoltaic System

The proposed 0.5 megawatt photovoltaic system is to be constructed on top of a 3,000 ft ridge within the Mendocino National Forest boundary and above the town of Lucerne. Having some experience in the design of megawatt photovoltaic systems, I would estimate this system will cover between 1 to 1.5 acres (not 0.4 acres as shown on the site plan) and will generate enough power to supply 90 homes. This will be one of the largest commercial photovoltaic systems in Lake County. The wildfire risk associated with a PV system of this size and in this location is extremely significant and should have been considered in the CEQA process. However, the initial study indicates that wildfire and energy impacts were not considered for this project. I believe the PV system should be evaluated as a separate project. Of particular concern is the wildfire risk to the home on the neighboring property 1,000 ft to the east of the PV system site. If a fire were to break out at the PV system location with the typical prevailing west wind, the driveway access to High Valley Road for this property would be blocked in seconds. On the other hand, a strong east wind (typical of red flag conditions) would push the fire down to Lucerne.

### Environmental and Safety Studies and Permits

The project documents describe the project as having over 8 acres of canopy (although 13 acres is actually shown on the site plan), 42 buildings, 1500 solar modules, (13) water tanks and a (16) space parking area but states that there will be no grading and no permitted buildings. In my experience as a civil engineer, there will be significant grading and all buildings, other than certain agricultural storage buildings and residential accessory buildings (such as tool sheds and playhouses), must have building permits. Page 7 of the initial study explains that "The County's issuance of the required permits (grading and building) triggers the need for compliance with the California Environmental Quality Act (CEQA)". Therefore, by not requiring grading and building permits, the project avoids the need to comply with CEQA. It appears that a design goal for this project was to avoid grading and building permits for this reason. This includes certain Calfire access requirements which are critical considering the significant PV system wildfire risk. This is very troubling since the top heavy 10' x 10' processing "sheds" will have electrical connections, no foundations and subjected to very strong wind events in a very high fire risk area. The absence of permitted buildings also means that none of the buildings can be occupied by people/employees. There will be no safe shelter during major wind or rain storms and no place for staff to reside and monitor the PV system or bank of generators.

This project should be denied based on the extreme wildfire risk, lack of environmental studies regarding the photovoltaic system and the unwillingness to obtain grading permits, building permits and the additional safeguards their issuance provides.

## GENERAL CONCERNS

1. The 0.5 megawatt photovoltaic system will have hundreds of electrical connections creating a significant fire hazard. The CEQA Notice of Intent claims that no vegetation will be removed or impacted for the project so the module arrays will apparently be installed over grassy hills. The power distribution to buildings, wells and water tank pumping systems also poses additional risks – especially if the nearly 2 acres of energized greenhouses in section 5 are ultimately constructed in a later phase.
2. The CEQA process requires the project to account for future conditions and expansions. Since the site plan lists the fenced in canopy areas to be nearly twice as large as the canopies themselves it would suggest a future canopy expansion. Also the reserved area 5, extremely large PV system and grow lights specifications indicate a much larger future operation which must be considered in the CEQA for this initial project.
3. The 997 KWh daily electrical demand will require aprx (33) 5 KW generators running 6 hours per day during PV system outages. Where are the generators located? How will they be stored? Will there be a pad for the generators which requires grading? Where and how will generator fuel be stored? Daily energy storage will require the equivalent of 1,730 car batteries (48 Ah/ea) per day to offset PV system downtimes (snow covered modules) which could last 5 days (8,650 car batteries equiv.) or more at the 3,000 ft elevation.
4. The project proposes three growing seasons. How does the applicant plan to grow cannabis in the winter at 3,000 ft elevation with snow on the ground and on the PV modules?
5. The 0.6 acres of solar module surface (equivalent to (17) 1500 sf home roofs), will result in rainfall runoff at aprx 400 gpm for a 1.5 in/hr rain event (thunderstorm). This runoff will flow directly to a stream nearby. The application documents do not discuss how this runoff will be addressed.
6. The wind loads on buildings and structures at this site will be significantly higher than the surrounding areas due to topographic effects. Conventional wood construction (non-engineered) does not account for these special wind effects and energized 10' x 10' top-heavy sheds without foundations will be particularly vulnerable and pose a risk for wildfire if overturned.
7. Sheds are considered permanent structures and therefore must have foundations.
  - a. *DCC REGULATIONS - (f) All structures included as part of the licensed premises shall be permanent structures. Structures that are considered permanent structures include, but are not limited to, buildings, barns, sheds, shipping containers, and modular buildings. Structures that are not considered to be permanent structures include, but are not limited to,*

*structures that rest on wheels or any structure that can be readily moved.*

8. Commercial buildings with employee or public occupancies are not exempt from building permits.
  - a. *AGRICULTURAL BUILDING EXEMPTION- A structure designed and constructed to house farm implements, hay, grain, poultry, livestock or other horticultural products. This structure shall not be a place of human habitation or a place of employment where agricultural products are processed, treated or packaged, nor shall it be a place used by the public.*
  - b. *SMALL BUILDING EXEMPTION - One-story detached accessory buildings to one- and two-family dwellings used as tool and storage sheds, playhouses and similar uses, provided the floor area does not exceed 120 square feet (11.15 m<sup>2</sup>) and a five (5') foot set back from property lines and other structures is maintained.*
9. Buildings where drying and storing occurs must be permitted as they are considered processing by the Department of Cannabis Control (DCC) regulations:
  - a. *"Processing" means all activities associated with the **drying**, curing, sifting, grading, trimming, rolling, **storing**, packaging, and labeling of cannabis or non-manufactured cannabis products.*

#### SITE PLAN

1. The unsigned site plans are considered preliminary documents. All permits require signed documents to ensure that the author has certified the documents are free of errors and omissions and are ready for submission. The submission of unsigned documents by the applicant could relieve the author of liability as they are considered incomplete.
2. The site plan was not stamped and signed as required per CA BPC 5536.1 as it indicates the siting of (55) new non-exempt commercial buildings and structures (CA BPC 5537).
3. The site plan was not stamped and signed as required per CA BPC 6735 as it provides specifications for (55) new non-exempt commercial buildings, structures, irrigation, drainage, water supply, water tanks, electrical utilities and grading (CA BPC 6731).
4. The site plan does not accurately show the area required for the 450 KW photovoltaic system (1500 x 300 W modules). The area required for the modules (16.5 sf/mod) is 24,750 sf (70 ft x 354 ft) as opposed to the 17,500 sf (70 ft x 250 ft) shown on the site plan. Designing for an inter-row spacing of 2:1 to address module to module shading requires aprx 50,000 sf (70 ft x 714 ft). Including a 10 ft clearance around the array perimeter requires a total of 66,000 sf (70 ft x 944 ft) or 1.5 acres. The locations for pad mounted inverters, transformers and switchgear will require additional space. Therefore, the required PV system area is aprx 3.8

times larger than what is proposed on the site plan.

5. The site plan does not show the proposed locations for the emergency generators required to supply the 997 KWh/day demand. This demand is equivalent to (33) 5 KW generators running 6 h/day. The electrical demand for this project is equivalent to the combined demand of 33 homes.
6. The site plan does not show the proposed locations for generator fuel storage which will require aprx 27 gal/day for the 997 KWh/day demand.
7. The site plan does not indicate the source of the property boundary information. Is the boundary based on Lake County assessor data (which is known to have significant discrepancies) or a record of survey? If setbacks are determined from Lake County assessor data then they too will likely inherit significant error potentially placing buildings and other structures or utilities too close to neighboring properties.
8. The site plan does not indicate the locations and extent of clearing (scrapping) and grading. The initial study states that 12.5 acres will be disturbed but the Notice of Intent states that no vegetation will be removed or impacted? The locations for clearing and grading should be clearly shown with total area values for each. The locations of cannabis plants should be shown on a separate drawing. The site plans imply that no clearing or grading will occur and that all items including buildings and water tanks will be simply placed on the undisturbed grassy slopes. The site plans should show all pad locations for the (42) buildings and (13) water tanks at a minimum. The land is not bare and is not flat so clearing and grading will occur.
9. The site plan shows the canopy areas to be aprx 70% larger than what the documents have listed. The canopy areas should be reduced to show that the proposed fenced areas are actually 70% larger than the proposed canopy areas.

#### INITIAL STUDY

1. Energy impacts were not considered in the initial study (IS p. 15). Considering that the PV system will be one of the largest commercial photovoltaic projects in Lake County at 450 KW (0.45 megawatts) and covering aprx 1.5 acres (not 0.40 acres as shown on the site plan), energy impacts should have been considered in the initial study.
2. Wildfire impacts were not considered (IS p.15). The 450 KW photovoltaic system will cover aprx 1.5 acres and will be located in a very high hazard fire zone. The proposed PV system will be situated on a ridge where topographic wind effects will significantly increase wind speeds. The PV system location is only 1,000 ft northwest and upwind (prevailing west wind) of a residential parcel with a home. A wildfire at the PV site with the prevailing west wind could block their driveway

access to High Valley Road within seconds leaving the residents trapped. Wildfire impacts should have been considered.

3. The IS states that no structures are proposed that require a building permit. There are 42 commercial buildings where cannabis processing and chemicals will be stored. The exemption for small buildings (CBC 105.2) applies to residential accessory buildings such as tool sheds and playhouses. The exemption does not apply to commercial processing facilities with employee occupancies and electrical connections. Since these buildings will have electrical and mechanical equipment, the risk of igniting a wildfire is elevated without full compliance with the California building codes. The CDD is obligated to require building permits for any building if they feel they pose a threat to the environment or public safety. The CDD should require building permits for all buildings, not only to ensure the safety of the buildings themselves, but to ensure that all of the Calfire access requirements are met since unpermitted buildings do not require Calfire access.
4. IS page 68 incorrectly states:  
*"The Project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental impacts."*

This is false and conflicts with other sections of the initial study, project management plan, site plan and other documents.

5. IS page 68 states that the impact of utilities is less than significant. However, the 0.5 megawatt photovoltaic system will cover aprx 1.5 acres and should be considered very significant.

#### PROJECT MANAGEMENT PLAN

1. The PMP dated March 2020 is unsigned and outdated. It describes a previous version of the project that included greenhouses, grow lights and other items that are inconsistent with current site plan and initial study. The PMP needs to be updated to reflect the current project and signed by the author to certify it is a final submittal document. All permits of any kind require signed documents to ensure that the author/designer has certified the documents are ready for submission.

Respectfully,  
Brian Hall, PE  
707-349-7783