



276 RANCH LLC (LUCETTI RANCH)
PO BOX 419, BOLINAS, CA
ATTENTION: PETER LUCETTI
PHONE : 415 710-0906
Email : peter@tablerockpartners.com

May 7, 2024

DELIVERED BY EMAIL VIA THE LAKE COUNTY CANNABIS WEB PORTAL

cannabisCEQA@lakecounty.ca.gov

Lake County Planning Commission

John Hess
District 1 Représentative

Everardo Chavez Perez
District 2 Représentative

Batsulwin Brown
District 3 Représentative

Christina Price
District 4 Représentative

Maile Field
District 5 Représentative

Court house 255 N. Forbes St.
Lakeport, California 95453

Rancho Lake Project Identification Reference:

Project Title: Rancho Lake: Major Use Permit (UP 21-15): Initial Study (IS 21-18)
Project Location: 19555 Grange Road, Middletown CA 95461
APN: 014-290-08 and 014-300-02, 03 and 04.

Dear Planning Commission Members,

The Luchetti family has been producing beef cattle on the 276 Ranch (Prime Farmland) in Southern Lake County uninterrupted for 54 years. We have a deep understanding and commitment to Lake Counties agricultural heritage, values, and the natural environment.

After repeated unsuccessful attempts, over the last 6 months, to engage in meaningful dialogue with the Lake County Planning Department, including Mireya Turner, Director; Michelle Irace, Principal Planner; and Commission member John Hess, and thorough review and analysis of the applicants Use Permit, Negative Declaration and related reports reflected in the meeting agenda and packet, the Luchetti Family is making a direct appeal to the Planning Commission.

The Planning Department's staff report shows no consideration of the Luchetti's expressed concerns and is deficient in addressing key elements, of the applicant's submission required by the California Environmental Quality Act (CEQA). The staff memo lacks critical independent review and analysis of key issues related to the Rancho Lake LLC Use Permit and Negative Declaration.

The Luchetti's respectfully request that the Planning Commission:

1. Deny approval of the Rancho Lake LLC Use Permit and Negative Declaration due to inadequate review of key CEQA elements. Specifically, the Rancho Lake well's proximity, within 500 feet and 900 feet respectively, of Luchetti ranch agricultural and domestic wells. Two significant drought events occurred from 2011 to 2017 and 2020 to 2022. Because of severe drought conditions, Luchetti's water pumping operations have been adversely impacted during the annual May to October irrigation season. The ranch has installed automatic pump saver technology on all wells. When the water supply runs down the pumps shut off automatically to save the pump motors. During the recent droughts well shut down became a troubling chronic problem limiting our ability to irrigate organic irrigated pasture consequentially impacting our organic beef production. While 2023 was a good rainfall year we continued to experience well shut down events indicating the wells did not fully recover in one year. We are aware that Hidden Valley Lake Community Services District (HVLCS D) had a similar experience with its golf course wells on Grange Road where well drawdown during the irrigation season impacted domestic wells on neighboring properties. The recovery of the Coyote Valley aquifer in winter months cited in the Rancho Lake hydrological study prepared by Hurvitz Environmental Services Inc., the Rancho Lake Negative Declaration and the Lake County Planning Department staff report does not, based on the Luchetti's firsthand operating experience going back to 1970, translate into adequate water supply for the May to October irrigation season annually in both wet and dry years. The Luchetti's believe that Rancho Lakes new well, located 500 feet from the Luchetti's agricultural well, will intensify the water supply problem during the irrigation season.

The Luchetti's have repeatedly communicated this concern to all parties. The Luchetti's are extremely disappointed that the staff report and the applicant's hydrological report ignored their concerns, are incomplete and have failed to satisfactorily identify and mitigate CEQA review requirements.

2. Noting the deficiencies in the Rancho Lake Negative Declaration and Hurvitz Environmental Services Inc. report the Luchetti's, on their own initiative, have retained Ryan Crawford, a Hydrologist from HDR Inc. (refer to Mr. Crawford HDR letter in public comment), who has worked on the HVLCS D Coyote Valley water monitoring program for over 20 years. The Luchetti ranch has actively contributed to this essential water monitoring program. Mr. Crawford, who in our opinion is the most knowledgeable local water expert, recommends stress testing agricultural well use on the Luchetti and Comstock ranches during the summer 2024 irrigation

season. This includes stress testing the Rancho Lake well when the Luchetti wells are in operation. At considerable inconvenience and expense, the Luchetti's are funding HDR's work scope during the 2024 irrigation season at a cost of \$38,500. Luchetti's expressly request that the Planning commission direct staff and Rancho Lake to fully cooperate with stress testing by HDR to better understand the impacts of the proposed project on the aquifer and properties that depend on it.

3. Following a detailed review of the Rancho Lake Negative Declaration and related supporting documentation, Lucy MacMillan, Luchetti's biologist, observes that the Negative Declaration is missing a required CEQA wetlands study. As a result, the Negative Declaration is incomplete for Planning Commission review and approval.
4. Luchetti's request that the Rancho Lake LLC Negative Declaration be denied due to inadequate odor control systems. The applicant does not provide an explanation of how odors are controlled using appropriately designed and engineered equipment and infrastructure that removes cannabis odors and noxious smells from cannabis farming. The absence of a properly engineered odor control system in the application at large is grounds for denial.
5. The Luchetti's request that the Planning Commission direct staff and county attorney to orchestrate the revision of Ordinance 3013 which acknowledges that cannabis may present certain conflicts with more traditional farming. The Luchetti's should be afforded no less protection for their organic cattle business on Prime Agricultural Land than is afforded to grape growers elsewhere in Lake County. The selective application of Ordinance 3013 is not equitable and is prejudicial to Luchetti's, and other Prime Farmland property owners. The staff report fails to properly identify and analyze this issue. The Luchetti's are requesting that the Lake County Planning Commission suspend review and approval of all cannabis applications, including the Rancho Lake LLC application, which are adjacent to Prime Agricultural Farmland until Ordinance 3013 is revised such that it addresses serious inequities and deficiencies in the wording and application of the ordinance.
6. Luchetti's observe that the pesticide drift issue raised in earlier correspondence and communications has not been satisfactorily addressed by the applicant. And overall, the applicant's approach does not comport with agricultural best practices that govern the use of herbicides and pesticides, which as cited above are not being equitably applied to the Luchetti's organic beef production operation.
7. Luchetti's request that the Lake County cannabis application process be revised to prevent piecemealing in the CEQA process. Specifically, the handling of well drilling permits by Environmental Health independent of Use Permits and Negative Declarations by Planning. The current practice is misleading, results in piecemealing, and denies neighboring parties impacted by a project due process under the law. This is the case with the Rancho Lake application, which describes the new Rancho Lake well as a preexisting well. This is categorically false and results in an unfair advantage for the applicant, consequently denying Luchetti's due process under the law and damages Luchetti's 54-year organic cattle business. The Rancho Lake Negative Declaration is deficient due to piecemealing. Following repeated communications to staff regarding this issue the staff report fails to correctly identify and address this deficiency.
8. Finally, Luchetti's request that the Planning Commission mandate an independent review (audit) of staff memo preparation practices in the Lake County Planning Department. It appears to Luchetti's that the Rancho Lake staff memo was either in whole or in part prepared by the applicant. The staff memo appears to have categorically omitted Luchetti's issues, concerns and necessary CEQA legally required content. The staff memo lacks critical independent review and analysis of key issues related to the Rancho Lake LLC Use Permit and Negative Declaration. The Luchetti's suspect, that given chronic severe resource constraint's, staff was either marginally involved, and may have even been uninvolved in critical review and analysis that is essential to ensuring a transparent and complete review process for the Rancho Lake application defining the

role the staff memo is supposed to play in ensuring the process is fair, equitable and transparent for all parties.

The Luchetti's request that the Cannabis Task Force, Lake County Planning Commission and Lake County Board of Supervisors closely review the efficacy of the cannabis ordinances governing cannabis farming in Lake County. The 2024 -2025 (fiscal year) Lake County budget indicates that less than 1.5% of the county budget is derived from cannabis related activities. In contrast county staff, across all departments, are dedicating inordinate time effort and resources to cannabis related activities. However well intended the cannabis policies were when they were created the pay back for the county is not being realized. The Lake County Planning department, among other departments, are committing inordinate resources to cannabis ordinance management crowding out other important policy objectives and programs that are essential to improving the quality of life and economic wellbeing of the citizens of Lake County. The Luchetti's, who were catastrophically impacted by the Valley Fire in 2015 and are deeply concerned about the community following multiple wildfire events urge staff and elected's to focus on addressing these issues. The Luchetti's should not as a neighboring property be drawn into dealing with flawed cannabis policies incurring considerable expense when there are much more important priorities to be addressed in Lake County.

In closing Luchetti's want to make it clear that the staff memo pertaining to the Rancho Lake cannabis project categorically ignores and omits Luchetti's issues and concerns and critical legally required CEQA review parameters, creating a false narrative for project approval by the Lake County Planning Commission. The Luchetti's and their legal counsel strongly advise all parties to meet, confer, and resolve these issues concerns and CEQA requirements associated with the Rancho Lake Project, avoiding costly litigation and conflicts that are unhealthy for neighbors, the county, and the community at large.

Let the record show that the Luchetti's have delivered this letter to the Lake County Planning Commission members through the cannabisCEQA@lakecounty.ca.gov web portal provided by the Lake County Planning Département.

Sincerely

A handwritten signature in black ink that reads "Peter Luchetti". The signature is written in a cursive, flowing style.

Peter Luchetti for the Luchetti Family (276 Ranch LLC)

Andrew Amelung

From: CJ <conni2015@yahoo.com>
Sent: Thursday, November 16, 2023 10:43 AM
To: Lake County CannabisCEQA
Subject: [EXTERNAL] Rancho Lake Major Use Permit

Dear Planning Division-

Thank you for taking the time to read my comments regarding the proposed Rancho Lake Major Use Permit located at 19955 Grange Road, Middletown CA 95461.

I am opposed to this becoming operational due to the obnoxious and toxic smell that growing, storing and harvesting cannabis creates.

I live within close enough proximity to these parcels. The afternoon wind pattern will bring the stench directly within my property.

I would have to disclose this should I choose to sell my home, therefore, this would lower my property value.

I am also very concerned in regards to the pollutants that will be within close proximity to our water source.

I look forward to your no vote on this permit.

Thank you, Connie

Andrew Amelung

From: DIEDRE DUNCAN <maildduncan@yahoo.com>
Sent: Monday, November 13, 2023 8:34 PM
To: Lake County CannabisCEQA
Subject: [EXTERNAL] Opposed to Cannabis in this location

I am appalled that this project is even being considered. There is a vital creek that will be absolutely awash with pesticides. The smell from growing and harvesting will be unbearable. We do not have enough water to support this giant operation on top of the other developments (golf courses and resorts) already planned. The traffic will impede commuters and negatively affect the ONE evacuation road in South County. I am asking you to save our community and our resources by denying the location of this project.

D Duncan
Resident

Andrew Amelung

From: John Ruiz <ruiznorcal@att.net>
Sent: Tuesday, November 28, 2023 9:39 AM
To: Lake County CannabisCEQA; Lake County Community Development - Planning Counter
Subject: [EXTERNAL] Public Response - to Project Title: Rancho Lake; Major Use Permit (UP 21-15); Initial Study (IS 21-16)

I am asking that the following project not be issued a permit or approved to proceed:

- Project Title: Rancho Lake; Major Use Permit (UP 21-15); Initial Study (IS 21-16)
- Project Location: 19955 Grange Road, Middletown, CA 95461
- APN No.: 014-290-08 and 014-300-02, 03, and 04

I am a resident of Hidden Valley Lake in Lake County CA, and own a home and a second undeveloped lot on Mountain Meadow South. My back fence and back yards (and many other homes in this neighborhood) will be in close proximity to the proposed 19.6 acre project, described in the Lake County CDD Notice of Intent document:

"...up to 854,940 sq. ft. (19.6 acres) of outdoor canopy area. The proposed Project will occur on Assessor Parcel Number (APN) 014-290-08 (Project Parcel) and APNs 014-300-02, 03, and 04 will be used for clustering. The proposed cannabis cultivation operation includes five (5) 6,000 sq. ft. Harvest Storage and Staging Areas, two (2) 120 sq. ft. Pesticides & Agricultural Chemicals Storage Areas, a 120 sq. ft. Security Center/Shed, and twenty (20) 5,000- gallon water storage tanks. "

I am objecting to the proposed project as written and would like to see it not approved. Among my objections are the following:

- 1. Commercial water use. California's concerns for water management and drought conditions speaks squarely to communities such as Lake County. Our strategic approach needn't introduce unnecessary commercial burdens on our current conditions. The state has eased some restrictions when possible and sensible but wise stewardship demands we avoid long term commitments that will burden resources, increase run off, risk seepage into Putah Creek, and place existing agricultural and individual resources at greater risk. (see footnotes 1, 2 & 3. below)**
- 2. The nuisance factor of the smell produced by indoor/outdoor grows is well established and would affect quality of life for neighboring residents. (see 4 below) The affect on air quality and even ozone**

concentration in areas is being studied. Lake County has been known historically as a region with some of the cleanest air quality in the world. Coyote Valley is known for high winds, afternoon winds that regularly occur throughout this area that will carry smells and affect air quality. Why deliberately put that at risk? (see foot note 4 below)

3. Overall environmental impacts of all types require greater study and consideration of the issues. A brief overview of some of these can be found in the linked document “Cannabis and the Environment: What Science Tells Us and What We Still Need to Know”. (see foot note 5) and in “Cannabis and the Environment document from the California Department of Fish and Wildlife (see foot note 6)

I would ask that we not go down the road of expense and time to manage issues that can be avoided by not approving this permit and not allowing the cannabis farm to go forward. Given the opportunity to vote I would vote NO.

(I’m including a map below that shows the proposed area for the permit and marking out the homes and neighborhoods nearest it)

Thank you,

John and Janet Ruiz

ruiznorcal@att.net

707-480-7584

Hidden Valley Lake, CA

footnotes

1. **California drought** - <https://www.gov.ca.gov/2023/03/24/governor-newsom-eases-drought-restrictions/>

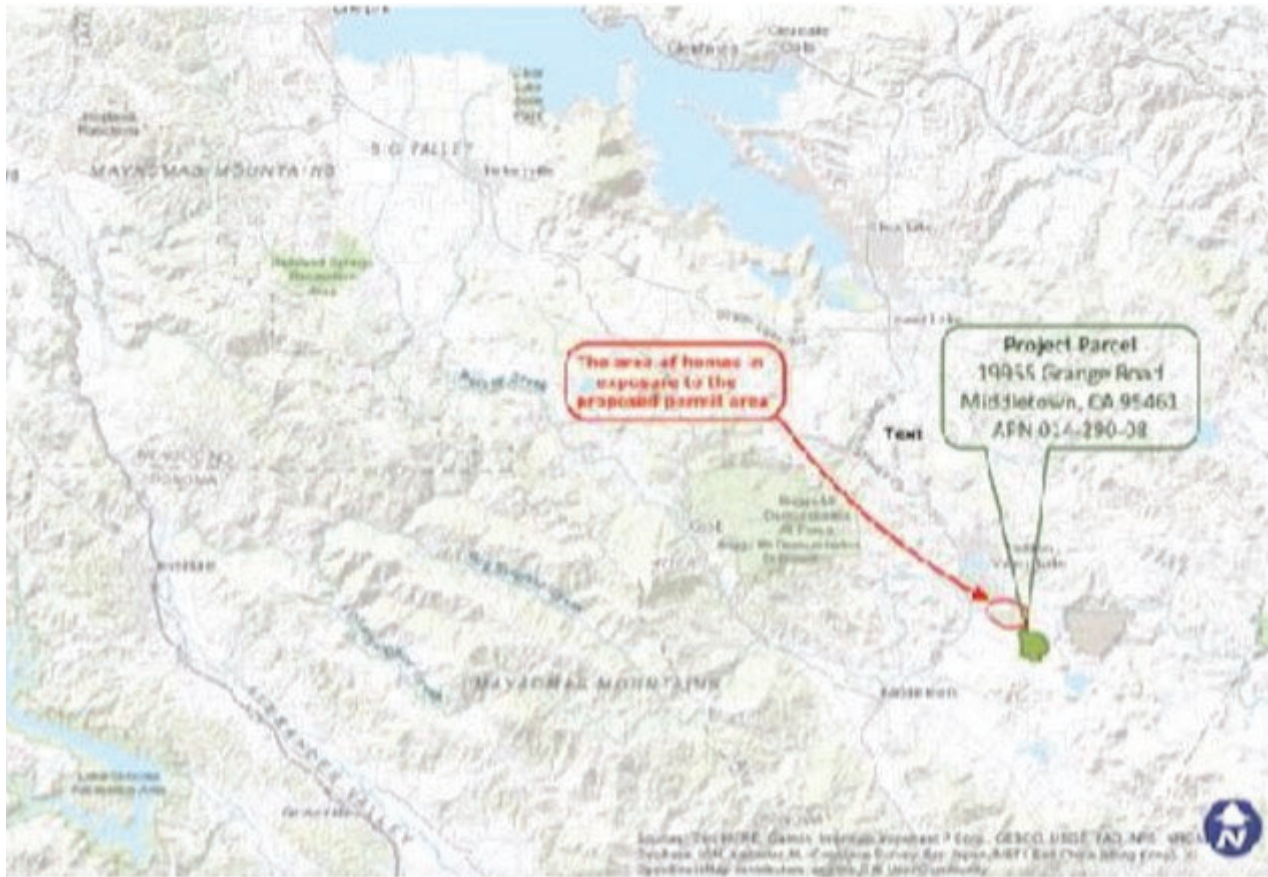
2. **Agriculture and water use in the West** - <https://www.usda.gov/media/press-releases/2023/03/23/secretary-vilsack-convenes-state-agriculture-leaders-colorado-river>

3. **Water usage of cannabis farms** - <https://mjbizdaily.com/cannabis-requires-more-water-than-commodity-crops-researchers-say/>
#:~:text=The%20water%20usage%20of%20outdoor,day%20per%20plant%20in%20September.

4. **Odor Control in the Cannabis Industry** - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9236214/>

5. **Cannabis and the Environment: What Science Tells Us and What We Still Need to Know** - <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00844>

6. Cannabis and the Environment - <https://wildlife.ca.gov/Conservation/Cannabis/Environment>



Andrew Amelung

From: Rebecca Gage <rebelr69@gmail.com>
Sent: Tuesday, November 14, 2023 7:46 AM
To: Lake County CannabisCEQA
Subject: [EXTERNAL] 19955 Grange Road

Please do not allow another grow in Middletown. There are three that I smell everyday in Middletown. My chiropractors office is inundated with the smell and it effecting their business. Just on my drive from hidden valley lake to the base of the mountain on highway 29 I smell 4 different grows. The smell triggers headaches for me. I couldn't imagine having to smell it everyday at my home or business. Please don't allow another grow in Middletown!

Rebecca Gage
Hidden Valley Lake



**276 RANCH LLC (LUCHETTI RANCH)
PO BOX 419, BOLINAS, CA
ATTENTION: PETER LUCHETTI
PHONE : 415 710-0906
Email : peter@tablerockpartners.com**

November 30, 2023

VIA EMAIL

cannabisCEQA@lakecounty.ca.gov

COUNTY OF LAKE
COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division
Courthouse 255 N. Forbes St.
Lakeport, California 95453

The purpose of this letter is to outline several issues with the Rancho Lake Project that compel the Luchetti Ranch, (276 Ranch LLC) to formally request that the County of Lake reject the Major Use Permit and Negative Declaration for Rancho Lake Project based on the Prime Farmland designation for the Luchetti Ranch organic certified irrigated pasture area. Refer to Exhibits A & B location maps. Exhibit C: California Important Farmland Finder.

Rancho Lake Project Identification Reference:

Project Title: Rancho Lake: Major Use Permit (UP 21-15): Initial Study (IS 21-18)
Project Location: 19555 Grange Road, Middletown CA 95461
APN: 014-290-08 and 014-300-02, 03 and 04.

Luchetti Ranch Parcels Identification

The Luchetti family own the following parcels in the name of 276 Ranch LLC immediately adjacent to the 19555 Grange Rd. parcels identified above. The 21565 and 21333 parcels are within 700 feet of the defined Rancho Lake project area. The Luchetti's also own two additional parcels that are contiguous with APNs 030 and 040 on Yankee Valley Rd:

APN 014-400-030-000, 21565 Grange Rd.
APN 014-400-040-000, 21333 Grange Rd.

APN 144-171-090-000, 21613 Yankee Valley Rd.
APN 144-171-080-000, 21631 Yankee Valley Rd.

Luchetti Ranch Comments:

1. Summary Comments

- a. **The Rancho Lake Project interferes with the Luchetti's Prime Farmland operations. While the Prime Farmland Ordinance does not cover the Luchetti Ranch it is directly relevant to the Luchetti's concerns. The project has a significant impact on the rare natural qualities of the area of Coyote Valley defined by the Comstock/Luchetti ranches:** The Valley at the end of Grange Rd. defined by the Luchetti and Comstock ranches is free of development and industrial activity and has been enjoyed by generations as a uniquely quiet, remote, safe, historic, and naturally isolated valley. Surrounded by circling hills, the valley's dark night sky has been protected from the modern impact of industrial noise, light pollution, truck traffic and security risks. The Luchettis have just completed a large multi-year capital investment in the ranch restoring catastrophic property losses following the Valley Fire. The location and level of activity contemplated by the Rancho Lake project's industrial scale outdoor cannabis farming and processing will have a material adverse impact on the natural environment and quality of life that the Luchetti and Comstock families have enjoyed in the valley for generations. The Luchetti's are opposed to the project in its current form based on the impact it will have on Coyote Valley, the wildlife therein, and the impacts on the Luchetti ranch.
- b. **Proximity to the Luchetti Ranch breaches the 1,000-foot threshold in Ordinance No. 3103:** The Lake Ranch LLC growing area is directly adjacent to the farm center and residential areas on the Luchetti ranch (Refer to map Exhibits A, B and C) And it's directly adjacent to the certified organic permanent pasture grazing area on the Luchetti ranch. The proposed project presents potential for adverse impacts on the Luchetti Ranch resulting from the use of agricultural chemicals, odor control, view sheds/glare, light pollution, dust, noise, wildfire risk and the volume of traffic resulting from the Rancho Lake project. The Luchetti's possess a heightened concern regarding the organic farming certification on the Luchetti Ranch and compatibility with the cultural practices involved in cannabis production, including but not limited to the use of agricultural chemicals and pesticides. The sheer volume of activity in growing cannabis on a commercial scale in such close proximity to the Luchetti's organic farming operations far exceeds anything that has existed in the Coyote Valley during the 54 years the Comstock and Luchetti ranches have coexisted together. The negative declaration does not discuss the potential impacts of chemical drift from the spraying of herbicides and pesticides, or the use of soil amendments, which has a potentially significant impact on the Luchetti Ranch. Further study of this issue is necessary to avoid such impacts through appropriate mitigation measures. In its current form, the negative declaration should be denied on this basis alone due to the significant risks to Luchetti Ranch and its organic farming operations.

In addition, the noise impacts of the project are not adequately mitigated under the draft negative declaration. NOI-2 imposes limits on decibel levels but places the burden

of monitoring such levels on the neighbors. A better mitigation measure would require the applicant to maintain ongoing monitoring utilizing sound level monitors to take the enforcement burden off of the neighbors.

- c. **Water Supply Stress:** (Refer to Exhibit E well locations) The Rancho Lake grow plan cites 49.1-acre feet (approximately 16,000,000 gallons) of water use from an existing well on the property that produces 355 gallons per minute. The CEQA report describes this as an existing well which is incorrect and misleading. It is not an existing well. The new Rancho Lake well was drilled in 2021 during the predevelopment phase of the Rancho Lake project a year after the Comstock's initially notified the Luchetti's of their plan for a cannabis farming project. The well drilling coincided with the first of several biological field assessments conducted in connection with this application. This suggests the applicant is seeking to piecemeal the well approval and have it treated as a distinct project from the cannabis cultivation. In truth, the projects are not distinct. The environmental impacts of the well should have been studied as part of this project assessment, rather than treating it as an existing well under the current project. Indeed, at the time the well was being drilled the Luchetti's expressed urgent and timely concern about the location of the well near two preexisting agricultural wells on the Luchetti Ranch (Refer to Exhibit E). Luchetti's concerns were dismissed and ignored. The Luchetti's believe that use of the preapplication permit to drill a new well that was later referred to as an existing well in the CEQA review is piecemealing and should be treated as a single project together with the proposed cannabis operation. To do otherwise would prevent an effective means of reviewing and commenting on the impact of the well on the aquifer and the Luchetti's organic cattle operations. This behavior results in Luchetti's having significantly diminished confidence in the project sponsors and the county review and permitting process and has led Luchetti's to object to the project.

The Luchetti's have been raising beef cattle and irrigating 110 acres of permanent pasture for cattle grazing in coyote valley for 54 years since acquiring the Luchetti ranch from the Comstock's in 1970. Based on 54 years of experience pumping 320.6-acre feet of water annually, licensed by the State Water Board) from Putah Creek, and supplemented by the two agricultural wells located near the new Rancho Lake well, the Luchetti's are certain that proposed Rancho Lake well pumping 49.1-acre feet annually will have a material adverse impact on water supply on the Luchetti ranch in the summer irrigation season. As it stands, the Luchetti's experience a shortage of water in most years and especially in dry years with clear evidence that water supply availability has steadily deteriorated since the mid 1980's. Recent drought years have severely worsened water supply conditions.

Furthermore, over the last 30 years the Luchetti Ranch has participated in a comprehensive State Water Board mandated ground water monitoring program in Coyote Valley led by Hidden Valley Community Services District (HVLCD). One of the 11 monitoring wells in the program is located on the Luchetti Ranch near the agricultural wells and the newly developed Rancho Lake well. Any activity involving the withdraw of water from the aquifer in the Coyote Valley, including but not limited to the new Rancho Lake well, must be incorporated into and reflected in the 30-year State Water Board mandated monitoring program managed by HVLCD. Luchetti's again emphasizes that water supply stress is an ongoing problem in Putah creek and in the ground water basin.

The Luchetti's 54-year history and hard gained knowledge pumping water for irrigation in Coyote Valley should not be ignored or dismissed in the review of the Rancho Lake permit application. The language in the CEQA report concerning water availability is inaccurate and misleading and should be revised accordingly to 'Potentially Significant'. The CEQA process must responsibly include an in-depth analysis with appropriate mitigation measures for water supply issues related to the proposed Rancho Lake project.

- d. **Odor Control:** Among the more challenging issues related to cannabis production in California is odor control. There are many lawsuits and cases that define this issue in the state of California. The Carpinteria, California case offers a contemporary reference illustrating the challenges in dealing with odor control. There is no getting around it, cannabis production smells bad. And as has proven to be the case in Carpinteria cannabis production where odor control has proven impossible to mitigate. The Luchetti family puts a high value on the natural setting and recreational value of the Luchetti Ranch, as should the County. The Luchetti's believe, based on a very well documented case history in California, that the Rancho Lake project will have a material adverse impact due to odor control issues resulting from cannabis production. The Luchetti's have painstakingly rebuilt the Luchetti ranch following the Valley Fire in 2015 and believe that cannabis crop odor has the potential to impede the quality of residential and recreational life on the ranch and is likely to devalue the Luchetti ranch. Adding to this concern is the impact on the Hidden Valley community including the area defined by the Ranchos. The project setting is not as isolated and rural as described in the CEQA review. Accordingly, this impact must be upgraded to 'Potentially Significant' so that it may receive greater scrutiny, in-depth review, and effective mitigation and monitoring measures.
- e. **Use of Agricultural Chemicals:** The Luchetti Ranch is a certified organic cattle farming facility producing 125 head of grass-fed organic beef annually. We sell our beef to Whole Foods. The Luchetti ranch runs a profitable business which contributes to Lake County's traditional agricultural heritage and productivity. As explained above, the Luchetti's have farmed beef cattle on the Luchetti Ranch for 54 years. The profitability of the cattle business critically depends on continued organic certification. Noting the Rancho Lake grow is immediately adjacent (less than 1,000 feet per Ordinance 3103) to a certified organic farming operation, the Luchetti ranch believes that cannabis production on the scale proposed by the Rancho Lake project utilizing agricultural chemicals is incompatible with organic beef production and is a substantial risk to its organic certification and thus should be revised in the CEQA report to 'Potentially Significant' to ensure more in-depth evaluation of this risk, as well as effective mitigation measures.
- f. **Impact on natural environment, view sheds and visual impacts related to Rancho Lake Infrastructure:** Rancho Project cannabis production requires significant infrastructure including five (5) 6,000 square foot (Total 30,000 square feet) of Harvest Storage Areas, two (2) 120 square foot (total 240 square feet) Pesticide & Agricultural Storage Areas, one (1) 120 sq. foot Security Center/Shed and twenty (20) 5,000-gallon (100,000 total) water storage tanks. Construction would include building fences, soil preparation, installing irrigation systems, developing the employee parking areas, and erecting the Harvest Storage & Staging Areas (engineered fabric structures). Construction is expected

to take 3 to 4 weeks and utilize 8 to 16 workers. The site will be surrounded with 6-foot galvanized woven wire fencing, with access using metal gates secured by padlocks. Security cameras will be installed around the perimeter of the cultivation areas.

Taken together, all these structures and the level of activity contemplated by the Rancho Lake project far exceed the historical agricultural use in the Coyote Valley and rises to the level of industrial scale farming that is inconsistent with the natural rural environment that defines the site and surrounding areas today. The Luchetti's again stress their concern about the location of the project and its adjacency to the Luchetti ranch living quarters, farm center, agricultural and domestic wells, and organic permanent pasture (Reference Exhibit F). Luchetti's request that the CEQA review be upgraded to 'Potentially Significant', so these concerns receive greater scrutiny and in-depth review.

Likewise, mitigation measure BIO-5 is inadequate to protect nesting bird species. The mitigation measure requires a pre-construction survey prior to the commencement of ground-disturbing activities. The way this measure is articulated potentially creates a loophole for non-ground-disturbing activities that could be disruptive to nesting birds prior to the need for a pre-construction survey. For example, trees and shrubs that provide nesting habitat, could be removed prior to the need for a survey. Accordingly, this mitigation measure should be revised to close that loophole.

Further, item (d) under Aesthetics asks whether the project will create a new source of glare, yet only the impacts of security lights is addressed. Cannabis cultivation involves the use of hoop houses and greenhouses, which are primarily made up of highly reflective materials. Because the glare impacts of such materials are not considered in the negative declaration, further study on such impacts is required.

- g. Night-time Lighting:** The Rancho Lake Project report cites the need for night-time security lighting. Currently there is little-to-no nighttime lighting in the valley related to residences or agriculture. The valley has remained a rare, "dark sky" location. The proposed lighting will have a material adverse impact on the valley, surrounding areas, and the wildlife in the area. Cannabis farming and Lake Rancho directly impact and interfere with the natural dark sky setting in the valley. The Luchetti ranch is committed to maintaining a natural dark sky environment. The night-time lighting impacts should be raised to 'Potentially Significant' in the CEQA review to ensure proper vetting and evaluation of night-time lighting impacts resulting from the Rancho Lake project, in recognition of the current status of the area which lacks light pollution. Such a setting is increasingly unique and deserves more protection than what is provided under the current negative declaration.
- h. Number of daily trips and size of work force and road usage impacts-** The Luchettis are concerned about the impact of automobiles, vans, construction vehicles and heavy equipment on Grange Road, the sole ingress/egress (in a Type 4 Wildfire Risk zone visited repeatedly by devastating fire in the past 8 years) for Luchetti Ranch, the Coast Guard, and the owners of Noyes Ranch. An employee parking area with fourteen (14) spaces and one ADA complaint finds the space. And daily traffic commutes during regular operations of approximately twenty-four (24) trips during regular operations, and up to forty (40) daily commutes during the peak planting and harvest periods. Weekly truck deliveries of

various project-related materials would occur throughout the cultivation season. The impact of this level of traffic on Grange Rd. and the Coast Guard Road is unrealistic impractical given the current state of repair of these roads.

Currently, Grange Road is very fragile and beyond the end of its useful design life, noting the original road was a tar and gravel road. To Luchetti's knowledge, Grange Road was never formally paved and as a result does not have a solid base rock foundation. Grange Road has become partially paved following many years of inconsistent chip sealing and frequent cold patching of potholes by the Lake County public works department. Grange Road readily breaks down, developing extensive pot holing, with light use. Modest increases in car and truck traffic over Grange Road have resulted in many new potholes. The County practice of semiannual cold patching of potholes is inadequate to maintain Grange Road in a state of good and safe repair. And with increased heavy use due to the development of the new golf course at the glider port site, vineyard operations, hay production and day-to-day traffic, Grange Road is already in need of substantial capital improvement.

Beyond the impacts on Grange Road, the Luchetti Ranch is concerned about the condition of the paved road that runs from the end of the county road up to the Coast Guard, commonly referred to as the Coast Guard Road. The Coast Guard Road is also fragile and is not in a state of good repair. The level of traffic resulting from the Rancho Lake project is likely to have a negative adverse impact on the Coast Guard Road as well. And following on the wildfire theme above there is a need to mitigate oak and other tree downfall within 300 feet of the Coast Guard Road to improve safety during wildfire events. The Luchetti's request that that number of daily trips and size of work force, size of work force road usage impacts be raised to 'Potentially Significant' in the CEQA review to ensure proper vetting and evaluation of impacts resulting from the Rancho Lake project.

- i. **Wildfire Risk:** The Luchetti and Comstock ranches were catastrophically impacted by the Valley Fire in 2015 and seriously threatened a second time by the LNU Lightning Complex fires in 2020. The Luchetti's incurred millions of dollars of property losses from the Valley Fire in 2015. The coyote valley and the Comstock and Luchetti ranches are critically vulnerable to wildfire events. The Luchetti's have experienced a high level of difficulty in securing insurance for newly built replacement structures, ranch infrastructure (water and power) and ranch equipment. The Luchetti's know from firsthand experience that the official government response during major wildfire events reaches a drawdown resulting in very little to no resources being available to defend outlying ranch properties. In 2015 Luchetti's did not see an adequately resourced first responder response for over a week. The Luchetti's and their employees remained on site caring for over 200 head of livestock. The Luchetti's have acted and rebuilt the Luchetti ranch to be more wildfire defensible and resilient. They have also invested heavily in onsite firefighting equipment. The Rancho Lake project involves a significantly heightened presence of human resources and farming equipment in the cannabis growing season, which is coincidental with the height of wildfire season. The level of activity associated with newly introduced industrial scale cannabis farming activities significantly increases wildfire risk in the Coyote Valley. The best practice during the high-risk months of wildfire season is to reduce outdoor activity involving humans and equipment to the bare minimum. The Rancho Lake project human and equipment footprint is simply too high relative to wildfire risk. It's imprudent to introduce greater wildfire risk in the immediate vicinity of the Luchetti and Comstock

ranches. Luchetti's request that wildfire risk impacts be raised to 'Potentially Significant' in the CEQA review to ensure proper vetting, evaluation of impacts resulting from the Rancho Lake project, and appropriate mitigation measures.

- j. Introduction of increased risk of criminal activity to the Valley for the first time:** There are countless articles in California concerning cannabis farming detailing crime reports specific to this crop. Law enforcement highlighting the need to "harden" operations because law enforcement lacks the budgetary resources to adequately cover cannabis growing activities. Lake County is subject to severe budget resource constraints and does not have the resources necessary to provide supernormal law enforcement capacity to properly police and secure a cannabis growing operation on the scale of the Rancho Lake Project. This problem is exacerbated by the project's rural setting, which increases law enforcement response times. In 2019 on a Friday night the Luchetti's encountered a crime scene at the end of Grange Rd. with a severely injured person lying on the ground. They called 911 and it took the Sheriff's department over 45 minutes to arrive at the scene. And while EMS arrived within 15 minutes, they would not approach the scene until it was secured by the sheriff. Both the regulated and the real requirements for intensive security including alarms, cameras, lights and video, and the jump in employee traffic, together change the remote and secure sense of the place, into a more industrial and higher risk setting. Criminal risk related to the Rancho Lake project is indivisible and nonexcludable for neighboring properties. There is no realistic or practical way for neighboring properties to adequately protect themselves from criminal risk. The Luchetti Ranch, and other residents in the surrounding area are not prepared to absorb the increased criminal risk associated with the Rancho Lake Project. Luchetti's request that that crime risk impacts be raised to 'Potentially Significant' in the CEQA review to ensure proper vetting and evaluation of impacts resulting from the Rancho Lake project, and appropriate mitigation measures.
- k. CannaCraft as commercial partner and sponsor of the Ranch Lake project:** CannaCraft is a privately held legally defined marijuana grower in California who grows and retails a wide range of marijuana related products. There is little to no public information about CannaCraft. It is Luchetti's understanding that the proposed growing contract with Comstock's defines an initial five-year term with options to extend to 15 years. The Luchetti's are requesting an in-depth business assessment of the contract between CannaCraft and Comstock's. It is necessary to perform a more in-depth review of the financial condition of the project sponsors, performance obligations and cure provisions defined in the parties' commercial arrangements in relation to any permit that is issued by Lake County for a cannabis project. The contract review should carefully assess performance guarantees backed up by sufficient performance bonds, letters of credit and liquidated damages to ensure that any industrial scale cannabis production introduced into the coyote valley provides neighboring properties with adequate protection from default risk and the failure of Rancho Lake LLC. In addition, permit language should include minimum annual independent performance reviews with publicly disclosed reporting to ensure full permit compliance. And a stipulation that the permit has a final maturity of 5-years and may not be renewed in the absence of a formal publicly disclosed independent permit compliance audit by the Lake County Planning Department. The compliance audit should include an assessment of negative impacts on adjacent properties. The potential for CannaCraft contractual default relative

to key performance obligations under its commercial growing contract represents an unacceptable level of risk to the Luchetti's and neighboring properties who do not have an economic interest in the Comstock cannabis farming project. Leaving local property owners holding the bag for a failed cannabis operation. There are many examples of failed cannabis operations in California and Lake County today that substantiate this concern. Luchetti's request that an in-depth commercial contract risk register and defined mitigating factors be developed to properly evaluate the Rancho Lake project's financial and performance risk concerns. This task should be raised to 'Potentially Significant' in the CEQA review to ensure proper vetting and evaluation of impacts resulting from the Rancho Lake project.

- I. **The draft CEQA report requires editing and upgrading several key impacts to the 'Potentially Significant Impact' level of review:** The Luchetti believes that several key impacts in the CEQA report, California Environmental Quality Act Environmental Check List Form Initial Study (UP 21-15, IS 21-26) are misclassified and need to be upgraded to Potentially Significant Impact to ensure proper review and vetting of key challenges and issues presented by the Rancho Lake project. The Rancho Lake project possesses several critical risks and issues that suggest it should not receive a negative declaration and that a full EIR process is warranted to properly address the issues and concerns raised by Luchetti's.

In closing Luchetti's formally request that the County of Lake reject the Major Use Permit and Negative Declaration for Rancho Lake Project based on the Prime Farmland designation for the Luchetti Ranch organic certified farming area. The Luchettis are entitled to a more complete and transparent review of their issues and concerns with the Rancho Lake Project. In considering this request, please take the following points into consideration. The Luchettis made a formal written request to the Comstock's to meet and confer to resolve their concerns. The Comstocks declined to meet with the Luchettis several times and referred the Luchettis to CanaCraft their commercial farming partner in the project. The Luchettis do not have a contractual relationship with CanaCraft and asked the Comstock's for a copy of the commercial contract so they could determine if their issues were addressed in the contract. Comstock's declined this request as well. Then the Luchetti's then reached out to John Ross, District 1 Board representative. Mr. Ross declined to speak to the Luchetti's about this matter. The Luchetti's researched the possibility that Ordinance No. 3103 might help address their concerns and found that while the ordinance would be helpful it doesn't apply to a 54-year organic ranching operation in Southern Lake County, which seems inequitable and unfair. The Luchettis then reached out to the Lake County Planning Director to discuss this matter but were unsuccessful in reaching her. The Luchetti's emphasize that piecemealing of the well drilling permit and refusal of the Comstock's and CanaCraft to stop and address their concerns when the well was being drilled is a primary concern resulting in a loss in confidence in this process. At this point in the process, the only recourse the Luchetti's have is this a letter to the board and a 3-minute public comment opportunity at a board meeting. Considering the litany of additional issues and concerns outlined herein the Luchetti's feel the formal review process is failing them. The Rancho Lake project is poorly designed and fails to resolve significant issues relating to interference with Luchetti's 54-year organic cattle ranching operation on Prime Farmland. Again, Luchetti's respectfully request, noting multiple failed attempts to be a constructive participant in this process, that the board reject the Rancho Lake application and negative declaration so that a complete and proper review of the project can be undertaken through a formal CEQA review process which is designed to address the full scope of issues outlined by the Luchettis. The Luchettis remain committed to open and transparent communications with the Lake County Planning Department and the Comstock's

and strongly encourage an active dialogue aimed at developing satisfactory resolution of a cannabis project that is mutually acceptable to all of the parties involved.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Luchetti". The script is cursive and fluid, with the first name "Peter" and last name "Luchetti" clearly distinguishable.

Peter Luchetti

EXHIBIT A

Comstock & Luchetti Ranch Locational Overview (Rancho Lake project area in red)



EXHIBIT B

Comstock Cannabis Growing Area Proximity to Prime Farmland on the Luchetti Ranch

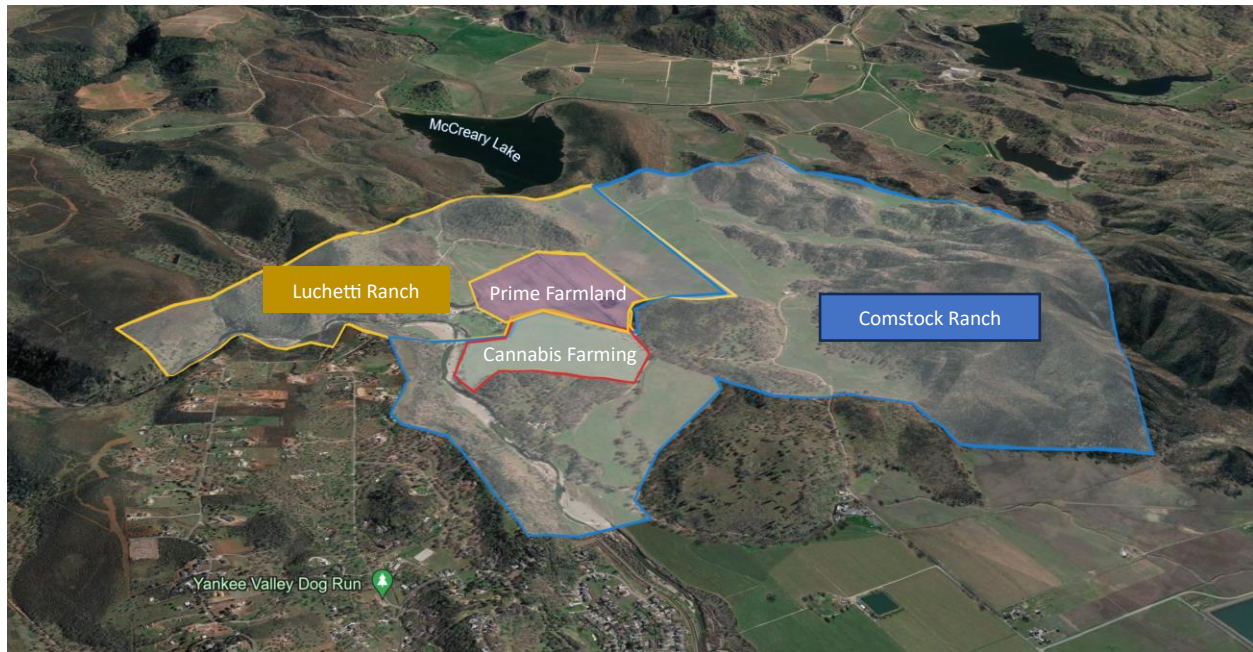


EXHIBIT C

California Important Farmland Finder

<https://maps.conservation.ca.gov/DLRP/CIFF/>

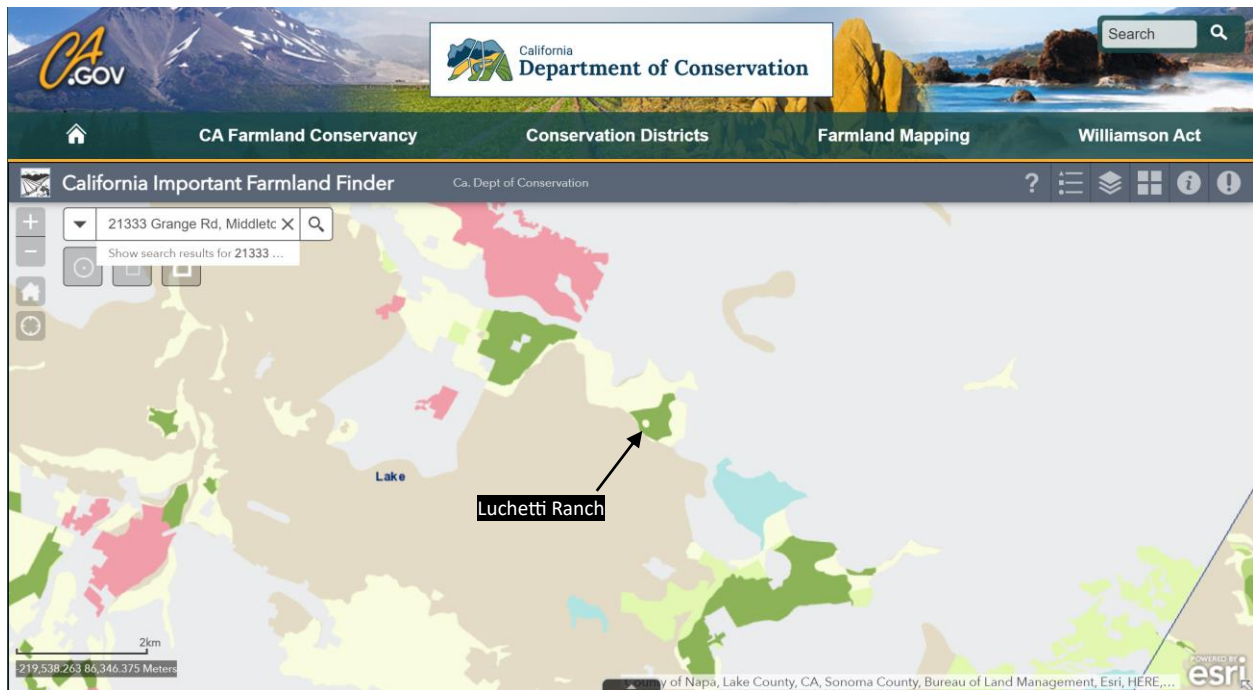


EXHIBIT D

BOARD OF SUPERVISORS, COUNTY OF ALKE, STATE OF CALIFORNIA ORDINACE NO 3101. AN ORDIANCE AMENIDNG CHAPTER 21, ARTICLES 27 & 68 OF THE LAKE COUNTY CODE PERTIANIING TO COMMERICAL CANNABIS CULTIVATION IN PROXEMITYU TO LAKE COUNTY IMPOTANT FRAMLAND.

BOARD OF SUPERVISORS, COUNTY OF LAKE, STATE OF CALIFORNIA

ORDINANCE NO. 3101

AN ORDINANCE AMENDING CHAPTER 21, ARTICLES 27 & 68 OF THE LAKE COUNTY CODE PERTAINING TO COMMERCIAL CANNABIS CULTIVATION IN PROXIMITY TO LAKE COUNTY IMPORTANT FARMLAND

THE BOARD OF SUPERVISORS OF THE COUNTY OF LAKE, STATE OF CALIFORNIA, ORDAINS AS FOLLOWS:

Section One: Section 68.4 of Chapter 21 of the Lake County Code is hereby amended with these following additions to section (f):

17. Farmland Protection Zone – Areas identified on Exhibit Map: Lake County Farmland Protection Zone is intended to protect specific farmland designation areas from cannabis outdoor cultivation.
18. Farmland Designation – Areas designated as prime farmland, farmland of statewide importance, unique farmland, and farmland of local importance as depicted on the current Lake County Important Farmland prepared by the State of California Department of Conservation Farmland Mapping and Monitoring Program.

Section Two: Section 27.13 of Chapter 21 of the Lake County Code is hereby amended as to the section (at), 1, vi with the following:

- vi. Lake County Important Farmland
Farming and agriculture is Lake County is important to our economy. Cannabis may present certain conflicts with more traditional farming. In order to ensure the protection of all agricultural industries within the county, the following rules will apply when cannabis cultivation interfaces with Farmland Protection Zones. If an applicant finds that their project is in an area where they shall not be allowed to cultivate outdoors, then their cannabis cultivation shall be limited to indoor, mixed light, and greenhouses that equipped with filtrations systems that prevents the movement of odors, pesticides, and other air borne contaminates out of or into the structure.
 - a. Outdoor cultivation of cannabis shall not be allowed within any Farmland Protection Zone.
 - b. Outdoor cultivation of cannabis shall not be allowed within 1000 feet of any Farmland Protection Zone.
 - c. If outdoor cultivation of cannabis is less than one (1) mile from Farmland Protection Zone, vegetation screening is required.
 - i. Vegetation screening shall consist of woody vegetation or trees that grow to no less than 20 feet tall.

- ii. Vegetation screening shall be between Farmland Protection Zone and the permitted cannabis canopy area.
- iii. The species of *woody vegetation* or *trees* to be used may be chosen by the permit applicant but should be suited to localized soil and site conditions. Native plant species are encouraged as are plantings which will benefit local fauna. Plantings must be *perennial* and hardy in the local climate zone as specified in scientific literature or garden catalogs.
- iv. Vegetation screen shall be effective in preventing substantial drift and approved by the Agricultural Commissioner.
- v. Vegetation screen shall be maintained through the life of the cultivation use permit.

Section Three: The Board of Supervisors independently finds and determines that this action is exempt from CEQA pursuant to Business and Professions Code section 26055(h) for the adoption of an ordinance, rule, or regulation by a local jurisdiction that requires discretionary review and approval of permits, licenses, or other authorizations to engage in commercial cannabis activity where the discretionary review in any such law, ordinance, rule, or regulation includes applicable environmental review under Public Resources Code sections 21000, et seq and under CEQA Guidelines section 15061(b)(3) as an activity that is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. The general exemption applies in this instance because it can be seen with certainty that there is no possibility that the proposed amendments could have a significant effect on the environment.

Section Four: All ordinances or parts of ordinances or resolutions or parts of resolutions in conflict herewith are hereby repealed to the extent of such conflict and no further.

Section Five: This ordinance shall take effect on the 14th day of ~~January~~, 2021, and before the expiration of fifteen days after its passage, it shall be published, at least once, in a newspaper of general circulation printed and published in the County of Lake.

The foregoing ordinance was introduced before the Board of Supervisors on 8th day of ~~December~~, 2020, and passed by the following vote on the 15th day of ~~December~~, 2020

AYES: Supervisors Sabatier, Crandell, Scott, and Simon

NOES: None

ABSENT OR NOT VOTING: Supervisor Brown

COUNTY OF LAKE

Mike Li
Mike Li (Dec 11, 2020 10:46 AM PST)

Chair, Board of Supervisors

ATTEST: CAROL J. HUCHINGSON

Clerk of the Board

By Shanna J. Juelin
Shanna Juelin (Dec 11, 2020 12:35 PST)



APPROVED AS TO FORM:

ANITA L. GRANT

County Counsel

By: _____

EXHIBIT E

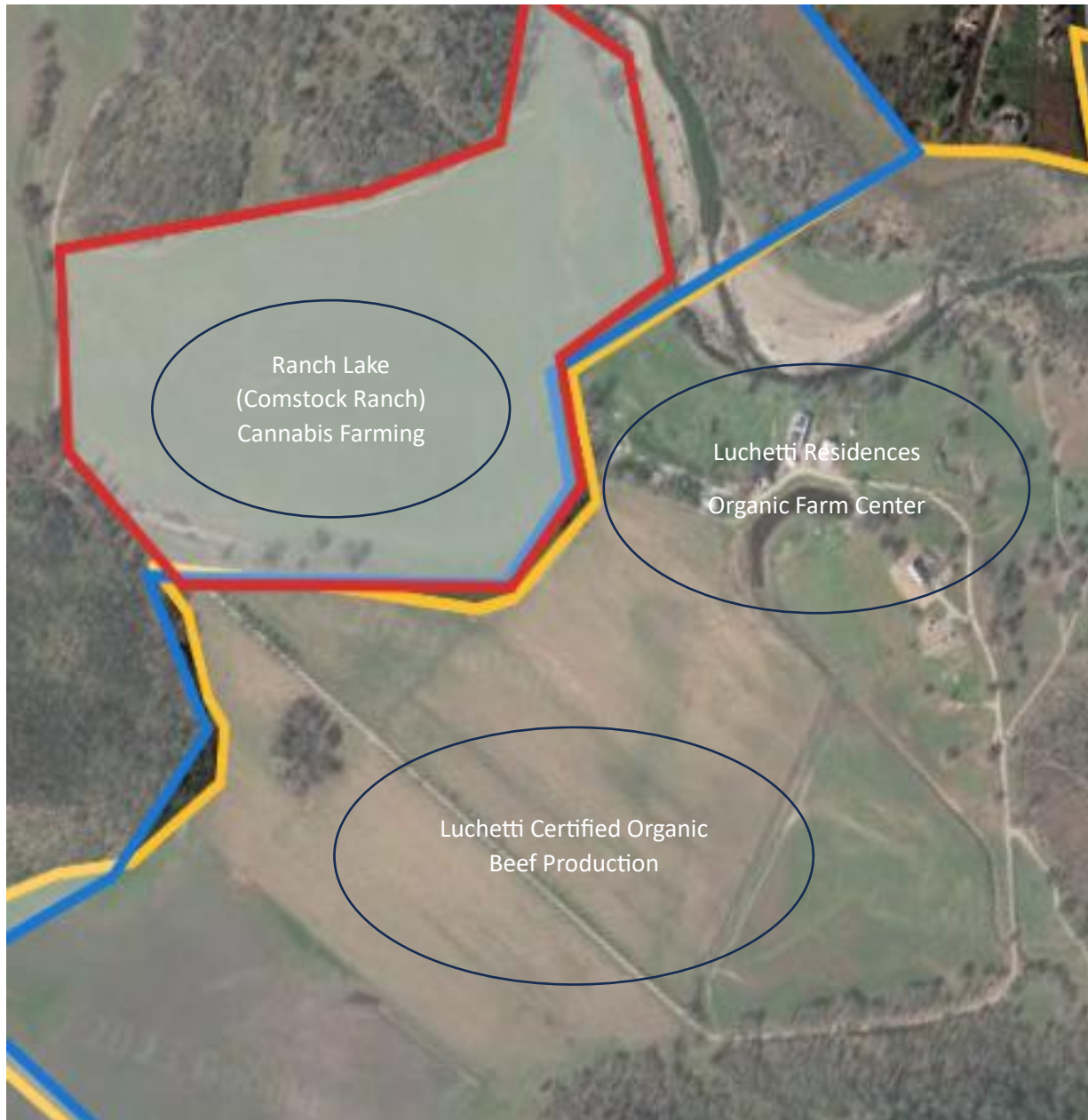
Overview of Well locations on the Comstock and Luchetti Ranches

- New Rancho Lake well
- Agricultural wells Luchetti Ranch
- Domestic household well Luchetti Ranch



EXHIBIT F

Zoom into Rancho Lake & Luchetti Ranch Organic Beef Production, Residential and Farm Center Areas



From: [Peter Luchetti](#)
To: [Andrew Amelung](#)
Subject: [EXTERNAL] QUESTION
Date: Monday, December 18, 2023 1:18:29 PM

I would like to see the Comstock move their project back to the area across their entry road. Doing so creates a 1,000 foot buffer between the growing site and my organic pasture. In terms of the permitting process can this be done without starting over? Would making such a change delay the process?

Thank you
Peter

--

Peter Luchetti, Managing Partner
peter@tablerockpartners.com
415-710-0906



**276 RANCH LLC (LUCHETTI RANCH)
PO BOX 419, BOLINAS, CA
ATTENTION: PETER LUCHETTI
PHONE : 415 710-0906
Email : peter@tablerockpartners.com**

April 30, 2024

VIA EMAIL

cannabisCEQA@lakecounty.ca.gov

COUNTY OF LAKE
COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division
Court house 255 N. Forbes St.
Lakeport, California 95453

Rancho Lake Project Identification Reference:

Project Title: Rancho Lake: Major Use Permit (UP 21-15): Initial Study (IS 21-18)
Project Location: 19555 Grange Road, Middletown CA 95461
APN: 014-290-08 and 014-300-02, 03 and 04.

The Luchetti Family (276 Ranch LLC) who owns a 650-acre organic beef production facility immediately adjacent to the proposed cannabis growing area on the Comstock Ranch is requesting that the Lake County Planning Commission reject the Rancho Lake LLC request for approval of Major Use permit (UP 12-15) and Mitigated Negative Declaration (IS 21-16) on the grounds that the proposed project as currently designed will have significant material adverse impacts on the 276 Ranch and the environment.

As highlighted in our letter of November 30, 2023 there are several issues that support this request. The Luchetti's have retained a biologist and hydrologist (reference attached letter) referencing the Luchetti's concerns.

Use of Herbicides and Pesticides

- As currently designed, the Rancho Lake Project is located unreasonably close to the property line and the 276 Ranch certified organic pasture area.

- 276 Ranch is a Prime Farmland Designated Area in the State of California Department of Conservation Mapping and Monitoring Program (Reference Exhibit A).
- The 276 Ranch has produced beef cattle on the ranch uninterrupted for 54 years.
- The County of Lake has previously acknowledged that cannabis may present certain conflicts with traditional farming activities. And long-standing traditional farming activities in Farmland Designated Areas (Prime Farmland).
- The Rancho Lake Project LLC applications specially acknowledge the use of pesticides and herbicides.
- Drift from the application of pesticides and herbicides has proven to be harmful to adjacent farming and ranching operations. Industry best practices call for adequate separation and protection zones and controls relating to the potential for drift from the use of pesticides and herbicides.
- The proposed project does not maintain adequate separation from the certified organic pasture area located on the 276 Ranch property. The risk of herbicide and pesticide drift due to the project's close proximity to the property line presents a significant risk to the environment and farming operations on the 276 Ranch property.
- 276 Ranch respectfully requests that the Lake County Planning Department acknowledge the potential for pesticide drift and deny the Rancho Lake Use Permit and Negative Declaration on that basis.

Water Supply Deficit

- 276 Ranch has been irrigating 110 acres of designated Prime Farmland immediately adjacent to the proposed Rancho Lake cannabis farming area for 54 years (Reference Exhibit B).
- 276 Ranch LLC holds the senior water right in the area (licensed by the State Water Board) authorizing it to pump 320.9-acre feet annually (from May to October) for the purpose of irrigating 110 acres of permanent pasture.
- 276 Ranch operates 2 agricultural wells with sufficient design capacity to meet this need and a household well to meet domestic needs.
- Over decades of operating experience during wet years the operation of the irrigation wells places a strain on water supply availability. And during dry years the water supply and availability is severely impacted.
- Water supply limitations in dry years have historically required the reduction of cattle production from 130 head to approximately 80 head of cattle.
- Rancho Lake LLC drilled a new well approximately 500 and 900 feet respectively from the 276 Ranch agricultural and domestic wells (Reference Exhibit C). Rancho Lake LLC's application indicates pumping 49 plus acre-feet from the aquifer. 276 Ranch raised concerns at the time the Rancho Lake LLC well was being developed. Their concerns were ignored and not addressed.
- The Rancho Lake well was drilled in an area that is highly likely to impact the 276 Ranch wells productivity and have an adverse impact on water supply in the area.
- As indicated in the attached letter from HDR, 276 Ranch's consulting hydrologist, water availability is a significant concern in the area and requires further study. 276 Ranch has responsibly retained HDR to conduct a thorough hydrological study during the 2024 irrigation season with a full report due later this year.
- 276 Ranch respectfully requests that the Lake County Planning Department acknowledge the potential for water supply shortages and deny the Rancho Lake Use Permit and Negative Declaration,

California Environmental Quality (CEQA) Act

Piecemealing

- Piecemealing occurs when an applicant willfully separates (piecemeals) an application consequentially denying a neighboring property owner the opportunity to fully evaluate the impact of the proposed activity, in this case cannabis farming by Rancho Lake LLC, in relation to 276 Ranch's organic cattle ranching business, its domestic presence on the ranch, and the natural environment.
- Rancho Lake LLC submitted a well drilling permit application, which was approved by the Lake County Environmental Department, knowing the well was being developed to support cannabis farming.
- Subsequently, once the well was drilled in a very sensitive location relative to the existing 276 Ranch agricultural and domestic wells with full knowledge of the Luchetti's expressed concerns, Rancho Lake LLC submitted its Use Permit and Negative Declaration.
- The timing of the two distinct and separate applications has denied the 276 Ranch, and other interested parties, due process in evaluating the Rancho Lake LLC Use Permit and Negative Declaration.
- Water resource availability and resource constraints have not been adequately explored.
- 276 Ranch respectfully requests that the Lake County Planning Department deny the Rancho Lake Use Permit and Negative Declaration based on piecemealing of the submission process by Rancho Lake LLC.

Other Issues of Concern

Topics that Require More In-depth CEQA Review and Evaluation and General Consideration by the Planning Commission among other agencies with jurisdiction in this matter

There are several topics that require more in-depth review and evaluation including but not limited to:

- The absence of a wetlands study, which is required by the CEQA process resulting in the Negative Declaration being incomplete.
- The number of daily automobile and truck trips rising to 40 round trips per day during the growing season in an area that has historically experienced less than 4 trips per day. This is a primary concern, noting there is only one way in and out of the ranch running through the Comstock property on a road that needs maintenance and repair and where wildfire risk factors add to safety considerations in an emergency.
- Odor control. The Luchetti family and farm manager residences are in close proximity to the growing area. It is highly likely they will be impacted by cannabis odor control concerns during the growing season. The current project design does not adequately deal with odor control.
- Security issues and law enforcement resource limitations in Southern Lake County. No fault of the Lake County Sheriff's department resources are limited. The Luchetti's are very familiar with slow response times from the Lake County Sheriff's office due to resource constraints. The Luchetti's do not believe that the area can be responsibly protected from criminal activity given resource limitations and constraints. The Luchetti's are not prepared to shoulder this risk.

- Wildfire risk. Both ranches, the Luchetti and Comstock ranches, were catastrophically impacted by the Valley fire. The 276 Ranch lost millions of dollars of livestock and property. The 276 Ranch was also impacted by the LNU lightning complex fires. It is difficult, next to impossible, to mitigate wildfire risk. Adding a cannabis operation to the mix significantly increases wildfire risk. The Luchetti's are not prepared to shoulder this risk.
- Impact on natural environment, view sheds and visual impacts. The close proximity of the project to the 276 Ranch farm center and residences directly impacts the Luchetti's view sheds and enjoyment of their ranch. The growing area is too close to the ranch living area and farm center on the 276 Ranch.
- Concerns about business and permit execution risk. The Luchetti family has extensive global business and project development experience outside of Lake County. In an effort to conduct normal background research on Rancho Lake LLC the Luchetti's requested information from the LLC on the operating history and financial wherewithal of the LLC partners. The applicant chose not to cooperate with the Luchetti's inquiry resulting in Luchetti's conducting more in-depth independent research and due diligence into the Rancho Lake LLC Partners. The results of this independent research were not favorable. There are serious concerns with the key Rancho Lake LLC operating partner's projects in Sonoma County. Neighbors there have raised yellow and red flag issues that remain chronically unresolved. Furthermore, it has been suggested that permit flipping, or speculation in selling the cannabis permit when issued, is a likely outcome in this case. Based on this research the Luchetti's are deeply concerned about potential permit flipping, changing partners in the LLC and uncertainty around cannabis farming operations and general business instability resulting in any failure to perform. Default risk around permit requirements and business commitments triggering broader collateral damage to neighbor's and the community. Unfortunately, a default and failure to perform typically becomes everyone's problem.
- Sadly, the States cannabis policy has proven to be flawed and has resulted in very poor outcomes for cannabis growers at large. Cannabis policy has failed in California, and short of substantial policy reforms is unfavorable for our community. As a successful 54-year cattle ranch on Prime Farmland in Southern Lake County located in a pristine environment the Luchetti's wish to avoid exposure to failed public policy in the cannabis industry and the likelihood that Rancho Lake LLC is not immune from these risks. In-depth due diligence into Rancho Lake LLC suggests that the permit application and business plan is insufficiently developed to warrant approval of the Use Permit and Negative declaration.
- 276 Ranch respectfully requests that the Lake County Planning Commission thoroughly weigh all these issues and concerns in deciding to deny the Rancho Lake Use permit and Negative declaration.

The Luchetti's have enjoyed a very friendly and supportive relationship with the Comstock family for 54 years. We like our neighbors and seek to get along and have done so with the Comstock's for a very long time. The Comstock family's Rancho Lake LLC cannabis application is placing great strain on our relationship. The Luchetti's in no way harbor ill will or bad feelings toward the Comstock's. However, we do feel the Rancho Lake project as currently designed is flawed and if implemented will have a material adverse impact on the 276 Ranch, neighboring properties and the community. The Luchetti's remain open to meeting with the Comstock's and exploring changes and alterations to the project aimed at addressing issues and concerns. The Luchetti's stress that the complexities of responding to the Rancho Lake LLC application are proving to be costly and time consuming and when viewed in conjunction with substantial increases insurance and wildfire related costs the Luchetti's, who do not have a stake in the

cannabis business, are seeking help from the Lake County Planning Commission. For now, based on the current design and burden of this process, the Luchetti's are respectfully requesting that the Lake County Planning Commission deny the Use Permit and Negative declaration for the project.

Sincerely

A handwritten signature in black ink, appearing to read "Pet Luchetti". The signature is written in a cursive, flowing style.

Peter Luchetti for 276 Ranch LLC, representing the Luchetti family.

EXHIBIT A

California Important Farmland Finder

<https://maps.conservation.ca.gov/DLRP/CIFF/>

Luchetti Property 276 Ranch Designated Prime Farmland

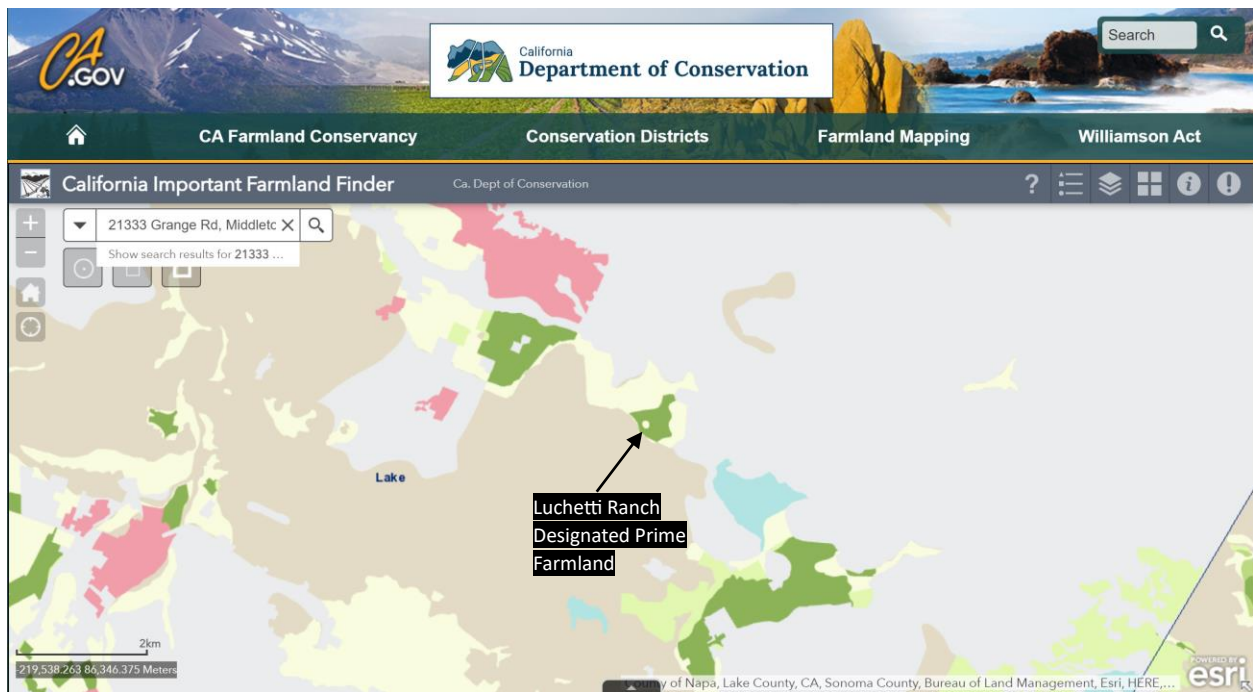


EXHIBIT B

Zoom into Rancho Lake & Luchetti Ranch Organic Beef Production, Residential and Farm Center Areas

Residential and Farm Center Areas



Exhibit C

Overview of Well Locations on the Comstock and Luchetti Ranches

- New Rancho Lake Cannabis Well
- Agricultural wells Luchetti Ranch
- Domestic household well Luchetti Ranch





April 30, 2024

**County of Lake
Planning Commission
255 N Forbes Street
Lakeport, CA 95453**

Re: Considerations for the Approval for Rancho Lake LLC Cannabis Permit and Grow Plan

**Proposed Project: Rancho Lake
Location: Grange Rd, Hidden Valley Lake**

GHD understands that as part of the Rancho Lake proposed grow plan, a new well was installed adjacent to the Luchetti Ranch's northern property boundary with the intent of extracting 49.1 acre-feet of water annually. The Luchetti Ranch, located at 21333 Grange Rd, Hidden Valley Lake in Coyote Valley, operates two agricultural wells for irrigation pasture grazing and one domestic well for a private residence. The new Rancho Lake well is approximately 500-feet from the Luchetti's agricultural wells and approximately 900 feet from their domestic well. The Luchetti Ranch possesses a senior riparian rights document that includes surface water from Putah Creek and groundwater from the southernmost corner of the Coyote Valley Groundwater Basin for more than 50 years.

GHD, who has been providing engineering services for the aquifer monitoring program in Coyote Valley for over 20 years, is currently unaware of any aquifer characterization studies, monitored pump tests, or groundwater level analysis conducted in vicinity of the Luchetti Ranch or the proposed Rancho Lake project. The Luchetti Ranch experiences a shortage of water in most normal rain years and more intensely during dry and drought condition years, qualitatively indicating that groundwater availability is already limited at this location.

Therefore, to evaluate the background ground water conditions in this portion of the Coyote Valley aquifer, on behalf of the Luchetti Ranch, GHD is conducting a groundwater study from May to November (the irrigation and growing season) 2024. The analysis may include observations of neighboring wells hydraulic pumping interference with Luchetti Ranch groundwater levels, recharge rates, groundwater quality, and other aquifer parameters. This information will be used to develop a preliminary conceptual hydrogeologic model of the aquifer below the site, and if possible, estimates of aquifer yield.



GHD advises that it would be prudent to ensure careful and thorough consideration prior to the approval of the proposed Rancho Lake project, including a proper accounting of the potential negative impacts the project may have on existing groundwater users, and in particular the Luchetti ranch, validating sustainable water resources in the immediate vicinity.

Sincerely,

GHD Inc.

A handwritten signature in blue ink that reads "Ryan Crawford". The signature is fluid and cursive, with the first name "Ryan" and last name "Crawford" clearly distinguishable.

Ryan Crawford, PG

Senior Hydrogeologist / Technical Director

email: ryan.crawford@ghd.com

(707) 523-1010

Lake County Planning Commission
Lake County Courthouse
1st Floor, Board Chambers
255 N Forbes St
Lakeport, CA 95453

Re: Rancho Lake Project - UP-21-15

Lake County Planning Commissioners,

I grew up on Grange Road, and spent many days after school on the Comstock Ranch. As an adult, my family and I make our home on Grange Road. I have continued to visit the ranch as a neighbor and as part of my job. I've seen firsthand how the Comstocks love and care for the land on their ranch, just as all of us in the area care about Coyote Valley. I give my full support for their cannabis project because I know that the Comstock family's interests are in line with the best interests of our community.

This is a project that is sustainable, with low impact on the land, and it will help the Comstocks preserve their ranch, and ranching in the Coyote Valley in general, for the next generation.

As both a friend and a close neighbor, I offer my endorsement of the Rancho Lake project.

Cody Smith

From: [Trey Sherrell](#)
To: [Michelle Irace](#)
Cc: [James Comstock](#); [Sarah Bodnar](#); [Ned Fussell](#); [Jim Comstock](#); [John Feitshans](#)
Subject: [EXTERNAL] Ranch Lake / Comstock Ranch Post Site Visit Follow-Up
Date: Friday, May 3, 2024 10:43:52 AM
Attachments: [Pest Management Plan - Rancho Lake.pdf](#)
[Luchetti Ranch Aq Well #2 WCR.pdf](#)
[Luchetti Ranch Aq Well #1 WCR.pdf](#)
[Luchetti Ranch Monitoring Well Logs.pdf](#)
[Comstock Ranch WCR.pdf](#)
[Luchetti Ranch Domestic Well WCR.pdf](#)
[Comstock-Luchetti Sub-Watershed.pdf](#)

Good Morning Michelle,

This email is a follow-up to our discussions yesterday during the Rancho Lake / Comstock Ranch site visit.

Please see the attached project specific Pest Management Plan. This is a more specific outline of the proposed pest management practices, as opposed to the "kitchen sink" list previously provided.

Please see the attached Well Completion Reports / Monitoring Well Logs for the Comstock and Luchetti Ranches, obtained from the Department of Water Resources.

Please see the attached License for Diversion and Use of Water for the Luchetti Ranch (A003797). I have provided the Annual Reports, obtained from the State Water Resources Control Board's Electronic Water Rights Information Management System (eWRIMS), for this license via the CDD Secure File Transfer (at your attention). There are multiple reports for multiple years, therefore in the name of each file, I have indicated the year each report was filed in parentheses and have added an "a" or "b" to indicate the multiple reports for each year. These reports indicate the amount of water used from both Putah Creek and the groundwater wells of/on the Luchetti Ranch.

As I mentioned, I will be referencing these reports and the monthly water level monitoring data for the two monitoring wells on the Luchetti Ranch Property from the Hidden Valley Lake Community Services District (previously provided via email) in my presentation to the commission.

Finally, please see the attached Comstock-Luchetti Sub-Watershed PDF. The Comstock and Luchetti Ranches are located within the Crazy Creek-Putah Creek HUC 12 Watershed, which includes Hidden Valley Lake, Coyote Valley and Putah Creek to the Lake/Napa County border. However an approximately 2,000-acre sub-watershed can be identified within the Crazy Creek-Putah Creek Watershed, bound by Putah Creek and Crazy Creek to the north, a low ridge to the west, and mountains and McCreary Lake to the south and east. The Comstock and Luchetti Ranches occupy nearly all of this sub-watershed. I will be applying the estimates for groundwater recharge from the Rancho Lake Hydrogeologic Assessment Report to this "Comstock-Luchetti Sub-Watershed" in my presentation to the commission.

Thank you for all of your time and consideration. I hope you have a great weekend and see you Thursday,

Trey

State of California
Well Completion Report
Form DWR 188 Submitted 2/23/2021
WCR2021-002299

Owner's Well Number _____ Date Work Began 02/02/2021 Date Work Ended 02/11/2021
Local Permit Agency Lake County Health Services Department - Environmental Health Division
Secondary Permit Agency _____ Permit Number WE-5548 Permit Date 01/20/2021

Well Owner (must remain confidential pursuant to Water Code 13752)	Planned Use and Activity
Name <u>James Comstock</u>	Activity <u>New Well</u>
Mailing Address <u>C/O All Good LLC</u>	Planned Use <u>Water Supply Irrigation - Agriculture</u>
<u>2349 Circadian Way</u>	
City <u>Santa Rosa</u> State <u>Ca</u> Zip <u>95407</u>	

Well Location	
Address <u>19955 Grange RD</u>	APN <u>014-029-08</u>
City <u>Middletown</u> Zip <u>95461</u> County <u>Lake</u>	Township <u>11 N</u>
Latitude <u>38</u> <u>46</u> <u>34.7</u> <u>N</u> Longitude <u>-122</u> <u>31</u> <u>28</u> <u>W</u>	Range <u>06 W</u>
Deg. Min. Sec. Deg. Min. Sec.	Section <u>28</u>
Dec. Lat. <u>38.7763056</u> Dec. Long. <u>-122.5244444</u>	Baseline Meridian <u>Mount Diablo</u>
Vertical Datum _____ Horizontal Datum <u>WGS84</u>	Ground Surface Elevation _____
Location Accuracy <u>20 Ft</u> Location Determination Method _____	Elevation Accuracy _____
	Elevation Determination Method _____

Borehole Information	Water Level and Yield of Completed Well
Orientation <u>Vertical</u> Specify _____	Depth to first water _____ (Feet below surface)
Drilling Method <u>Direct Rotary</u> Drilling Fluid <u>Bentonite</u>	Depth to Static _____
Total Depth of Boring <u>160</u> Feet	Water Level <u>22</u> (Feet) Date Measured <u>02/11/2021</u>
Total Depth of Completed Well <u>140</u> Feet	Estimated Yield* <u>300</u> (GPM) Test Type <u>Air Lift</u>
	Test Length <u>1</u> (Hours) Total Drawdown <u>113</u> (feet)
	*May not be representative of a well's long term yield.

Geologic Log - Free Form		
Depth from Surface Feet to Feet	Description	
0	20	Sand, soil and gravel
20	79	Sand and gravel
79	90	Sand and clay
90	112	Gravel and sand
112	129	Gravel
129	160	Clay

Casings										
Casing #	Depth from Surface Feet to Feet		Casing Type	Material	Casings Specificatons	Wall Thickness (inches)	Outside Diameter (inches)	Screen Type	Slot Size if any (inches)	Description
1	0	50	Blank	PVC	OD: 8.625 in. SDR: 17 Thickness: 0.508 in.	0.508	8.625			
1	50	130	Screen	PVC	OD: 8.625 in. SDR: 17 Thickness: 0.508 in.	0.508	8.625	Milled Slots	0.032	
1	130	140	Blank	PVC	OD: 8.625 in. SDR: 17 Thickness: 0.508 in.	0.508	8.625			

Annular Material					
Depth from Surface Feet to Feet		Fill	Fill Type Details	Filter Pack Size	Description
0	50	Cement	Portland Cement/Neat Cement		Seal
50	160	Filter Pack	Other Gravel Pack	3/8	Pea Gravel

Other Observations:

Borehole Specifications		
Depth from Surface Feet to Feet		Borehole Diameter (inches)
0	50	14.75
50	160	12.25

Certification Statement

I, the undersigned, certify that this report is complete and accurate to the best of my knowledge and belief

Name

WEEKS DRILLING AND PUMP CO

Person, Firm or Corporation

PO BOX 176

SEBASTOPOL

CA

94573-

Address

City

State

Zip

Signed

electronic signature received

02/23/2021

177681

C-57 Licensed Water Well Contractor

Date Signed

C-57 License Number

Attachments
014-290-08.pdf - Location Map

DWR Use Only

CSG #

State Well Number

Site Code

Local Well Number

N

W

Latitude Deg/Min/Sec

Longitude Deg/Min/Sec

TRS:

APN:

ORIGINAL

File with DWR

STATE OF CALIFORNIA

THE RESOURCES AGENCY

DEPARTMENT OF WATER RESOURCES

WATER WELL DRILLERS REPORT

HN/06W-28M

Do not fill in

No. 133872

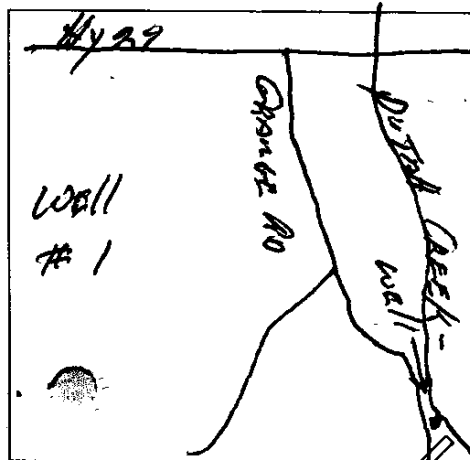
Not a Patent No. _____

Local Permit No. or Date _____

State Well No. _____

Other Well No. _____

(2) LOCATION OF WELL (See instructions):

County LAKE Owner's Well Number _____Well address if different from above LUCY RANCH END OF GRANGE RDTownship Middle Town Range 6 W-11 N Section 2728 28Distance from cities, roads, railroads, fences, etc. 2 1/2 MILES IN FROM END GRANGE ROAD

WELL LOCATION SKETCH

(3) TYPE OF WORK:

- New Well ☒ Deepening ☐
 Reconstruction ☐
 Reconditioning ☐
 Horizontal Well ☐

Destruction ☐ (Describe destruction materials and procedures in Item 12)

(4) PROPOSED USE:

- Domestic ☒
 Irrigation ☐
 Industrial ☐
 Test Well ☐
 Stock ☐
 Municipal ☐
 Other ☐

(5) EQUIPMENT:

- Rotary ☐ Reverse ☐
 Cable ☒ Air ☐
 Other ☐ Bucket ☐

(6) GRAVEL PACK:

- Yes ☐ No ☒ Size _____
 Diameter of bore _____
 Packed from _____ to _____ ft.

(7) CASING INSTALLED:

- Steel ☒ Plastic ☐ Concrete ☐

(8) PERFORATIONS:

- Type of perforation or size of screen _____

From ft.	To ft.	Dia. in.	Gage or Wall	From ft.	To ft.	Slot size
72	100	3 1/2	188	40	98	18x3"

(9) WELL SEAL:

Was surface sanitary seal provided? Yes ☒ No ☐ If yes, to depth 20 ft.Were strata sealed against pollution? Yes ☐ No ☒ Interval _____ ft.Method of sealing CEMENT

(10) WATER LEVELS:

Depth of first water, if known 22 ft.Standing level after well completion 16 ft.

(11) WELL TESTS:

Was well test made? Yes ☒ No ☐ If yes, by whom RAIN BOW
 Type of test Pump ☒ Bailor ☐ Air lift ☐Depth to water at start of test 16 ft. At end of test 16 ft.Discharge 550 gal/min after 4 hours Water temperature 60Chem. analysis made? Yes ☐ No ☒ If yes, by whom?Was electric log made? Yes ☐ No ☒ If yes, attach copy to this report(12) WELL LOG: Total depth 100 ft. Depth of completed well 100 ft.
 from ft. to ft. Formation (Describe by color, character, size or material)Top - 60' Clay & Gravel - Brown60 - 100' Blue Clay & Gravel -Well - pumping 250 GpmAT - 60'

ORIGINAL

File with DWR

Notice of Intent No. _____

Local permit No. or Date _____

STATE OF CALIFORNIA
THE RESOURCES AGENCY
DEPARTMENT OF WATER RESOURCES
WATER WELL DRILLERS REPORT

11N/06W-28M

Do not fill in

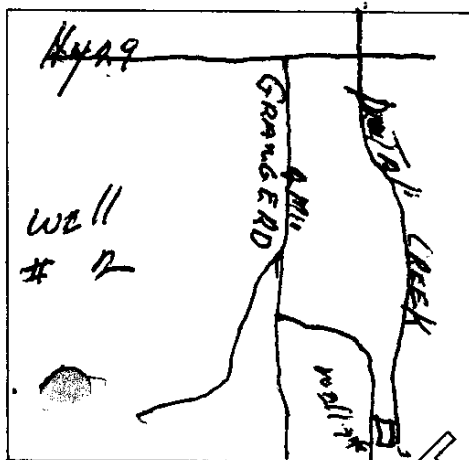
No. 133871

State Well No. _____

Other Well No. _____

(2) LOCATION OF WELL (See instructions):

County LAKE Owner's Well Number _____
Well address if different from above LOCHET RANCH END GRANGE RD
Township MIDDLEBURY Range 6 Will N Section 27 28
Distance from cities, roads, railroads, fences, etc. 11N/6W-28
2 1/2 MILES IN FROM GRANGE ROAD



WELL LOCATION SKETCH

(3) TYPE OF WORK:

New Well ☒ Deepening ☐
Reconstruction ☐
Reconditioning ☐
Horizontal Well ☐

Destruction ☐ (Describe destruction materials and procedures in Item 12)

(4) PROPOSED USE:

Domestic ☐
Irrigation ☒
Industrial ☐
Test Well ☐
Stock ☐
Municipal ☐
Other ☐

(5) EQUIPMENT:

Rotary ☐ Reverse ☐
Cable ☒ Air ☐
Other ☐ Bucket ☐

(6) GRAVEL PACK:

Yes ☐ No ☒ Size 1/2"
Diameter of bore 12"
Packed from 120 to 130

(7) CASING INSTALLED:

Steel ☒ Plastic ☐ Concrete ☐

(8) PERFORATIONS:

Type of perforation or size of screen

From ft.	To ft.	Dia. in.	Gage or Wall	From ft.	To ft.	Slot size
72	180	12	198	35	175	1/2 X 3"

(9) WELL SEAL:

Was surface sanitary seal provided? Yes ☒ No ☐ If yes, to depth 20 ft.
Were strata sealed against pollution? Yes ☐ No ☒ Interval 18 ft.
Method of sealing _____

(10) WATER LEVELS:

Depth of first water, if known 30 ft.
Standing level after well completion 19 ft.

(11) WELL TESTS:

Was well test made? Yes ☒ No ☐ If yes, by whom? Pain Bow
Type of test Pump Bailer ☐ Air lift ☐
Depth to water at start of test 18 ft. At end of test 18 ft.
Discharge 800 gal/min after 4 hours Water temperature Cold
Chemical analysis made? Yes ☐ No ☒ If yes, by whom? _____
Was electric log made? Yes ☐ No ☒ If yes, attach copy to this report

(12) WELL LOG: Total depth 190 ft. Depth of completed well 190 ft.
from ft. to ft. Formation (Describe by color, character, size or material)

0 - 35 Top Soil - BROWN
35 - 60 Clay + GRAVELS - BROWN
60 - 62 GRAVEL - WATER
62 - 105 Blue Clay -
105 - 110 Rock -
110 - 135 Blue GRAVEL - WATER
135 - 170 Soft BLUE -
170 - 190 BOLDERS
190 - 190 BED ROCK -

Well - pumping 400 GPM
MAR 23 1998

Work started May 6 19 99 Completed May 15 19 99

WELL DRILLER'S STATEMENT:

This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

SIGNED RUGENE ROUSONE (Well Driller)

NAME RUGENE ROUSONE (Person, firm, or corporation) (Typed or printed)

Address PO BOX 65

City LOWER LAKE Zip 95457

License No. 196290 Date of this report MAY-17-99

STATE OF CALIFORNIA WELL COMPLETION REPORT

Refer to Instruction Pamphlet

No. **0951429**

DWR USE ONLY — DO NOT FILL IN

11N/06W-29

STATE WELL NO./STATION NO.

LATITUDE LONGITUDE

APN/TRS/OTHER

GEOLOGIC LOG

ORIENTATION (°)			VERTICAL	HORIZONTAL	ANGLE	(SPECIFY)
			☒			
DEPTH FROM SURFACE			DRILLING METHOD <u>Rotary</u>			
			FLUID <u>Mud</u>			
Ft.	to	Ft.	DESCRIPTION			
			Describe material, grain size, color, etc.			
0	5		Brown Soil			
5	18		Brown Clay			
18	31		Brown Sand + Gravel			
31	40		Blue Clay			
40	45		Brown Sand			
45	103		Blue Clay w/ some gravel			
103	137		Blue Green gravel with Clay			
137	168		Hard Black + Blue Vol. Rock very broken			

WELL LOCATION

Address 21333 Grange Rd.

City Middletown

County Lake

APN Book 014 Page 400 Parcel 040

Township 11N Range 06W Section 29

Lat. DEG. MIN. SEC. N Long. DEG. MIN. SEC. W

LOCATION SKETCH NORTH

WEST EAST

200'±

200'±

200'±

Ag well

well

Ag well

ACTIVITY (°)

☒ NEW WELL

MODIFICATION/REPAIR

Deepen

Other (Specify)

DESTROY (Describe Procedures and Materials Under "GEOLOGIC LOG")

USES (°)

WATER SUPPLY

☒ Domestic ☐ Public

☐ Irrigation ☐ Industrial

MONITORING

TEST WELL

CATHODIC PROTECTION

HEAT EXCHANGE

DIRECT PUSH

INJECTION

VAPOR EXTRACTION

SPARGING

REMEDICATION

OTHER (SPECIFY)

WATER LEVEL & YIELD OF COMPLETED WELL

DEPTH TO FIRST WATER 25' (Ft.) BELOW SURFACE

DEPTH OF STATIC WATER LEVEL 20 (Ft.) & DATE MEASURED 3/12/2014

ESTIMATED YIELD 100 (GPM) & TEST TYPE Air Lift

TEST LENGTH 1/2 (Hrs.) TOTAL DRAWDOWN (Ft.)

* May not be representative of a well's long-term yield.

DEPTH FROM SURFACE		BORE-HOLE DIA. (Inches)	CASING (S)					DEPTH FROM SURFACE		ANNULAR MATERIAL			
Ft.	to		TYPE (°)	MATERIAL / GRADE	INTERNAL DIAMETER (Inches)	GAUGE OR WALL THICKNESS	SLOT SIZE IF ANY (Inches)	Ft.	to	CE-MENT (°)	BEN-TONITE (°)	FILL (°)	FILTER PACK (TYPE/SIZE)
0	137	15"	X	PVC/P40	8"	SDR21		0	2	X			
								2	23		X		
								23	135			X	per gravel
								135	137				

ATTACHMENTS (°)

☐ Geologic Log

☐ Well Construction Diagram

☐ Geophysical Log(s)

☐ Soil/Water Chemical Analyses

☐ Other

ATTACH ADDITIONAL INFORMATION, IF IT EXISTS.

CERTIFICATION STATEMENT

I, the undersigned, certify that this report is complete and accurate to the best of my knowledge and belief.

NAME Dan Mc Mullen Well Drilling

(PERSON, FIRM, OR CORPORATION) (TYPED OR PRINTED)

ADDRESS P.O. Box 951 CITY Lower Lake STATE CA ZIP 95457

Signed Dan Mc Mullen DATE SIGNED 3/14/2014 533152

C-57 LICENSED WATER WELL CONTRACTOR

C-57 LICENSE NUMBER

LUCHETTI RANCH MONITORING WELL LOGS
(MW 5A, MW 5B)



October 27, 1998
Job No. 108.07.01

James C. Hanson Consulting Civil Engineer
444 North Third Street, Suite 400
Sacramento, California 95814

5A 5B
Monitoring Well Installation
MW-~~4A~~ and ~~4B~~, Luchetti Ranch
Hidden Valley Lake CSD
Lake County, California

Gentlemen:

This letter summarizes the drilling activities and transmits our geologic log associated with the installation of monitoring well MW-4A and -4B for the Hidden Valley Lake Community Services District in Lake County, California. The wells were drilled on the Luchetti property, north of Grange Road and about 2.53 miles southeast of Highway 29, at the location shown on the attached Location Map, Plate 1. Our scope of services consisted of logging the conditions encountered during drilling of the well boring, providing geologic input to the construction of the wells, and presenting the findings in this letter.

Field Activities

On June 1 and 2, 1998, our engineering geologist observed the drilling of the boring for wells MW-4A and 4B by Weeks Drilling and Pump Company of Sebastopol, California. The well boring was drilled to a total depth of 100 feet, using a truck-mounted Failing 1500 rotary wash drill rig, equipped with a 7-7/8 inch diameter bit. The subsurface conditions encountered were logged by observing the drill cuttings circulated out of the borehole. The lithologic log for the boring is attached as Plate 2. The alluvial soils encountered were classified according to the Unified Soil Classification System described on Plate 3.

At the completion of drilling, the boring was flushed with clean water and two monitoring well casings were installed. The well completion detail is presented on Plate 2. The wells were constructed of 2-inch diameter Schedule 40 PVC casing, with 0.020-inch machine-slotted well screens. The deeper well casing (MW-4A) was screened from a depth of 90 to 100 feet and the second, shallower well (MW-4B) was screened from a depth of 30 to 40 feet. The dual well completion was performed to allow measurement of slight differences in

water levels, as an indicator of vertical ground-water gradients. The static water level was obscured by the bentonite mud used to drill the boring and we were not able to measure a water level at the time of drilling.

The annular space around the screened interval of each well consists of Lonestar #3 sand. A bentonite seal was placed above the sandpack from a depth of 20 to 16 feet. A surface grout seal, consisting of cement with approximately 5% bentonite was placed under the observation of Mr. Manual Ramirez of the Lake County Department of Environmental Health. The well casings extend above grade and are housed within a locking steel well vault.

Interpretation of Subsurface Conditions

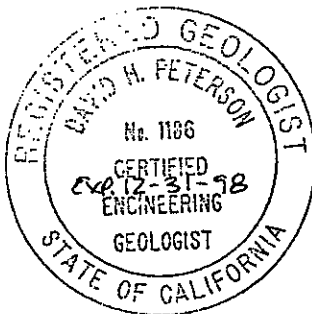
Wells MW-1 through MW-3, previously installed further west, encountered predominantly clean sands and gravels, indicative of stream channel deposits. The boring for MW-4A and 4B encountered interbedded sandy gravel, gravelly sand, clayey sand, and sandy clay alluvial strata to the depth explored. The clean sand and gravel units (soil symbols SP and GP) appear to represent stream channel deposits, possibly deposited as the main stream channel occasionally shifted across the valley bottom, or from tributaries. These strata are interbedded with finer grained materials that are more likely overbank and flood plain deposits, somewhat more removed from the main channel. We assume that ground water in the more permeable sand and gravel strata is at least partially confined.

We trust this letter provides the information you require. If you have questions about our findings, please call the undersigned at (707) 823-9290.

Very truly yours,
The Geoservices Group



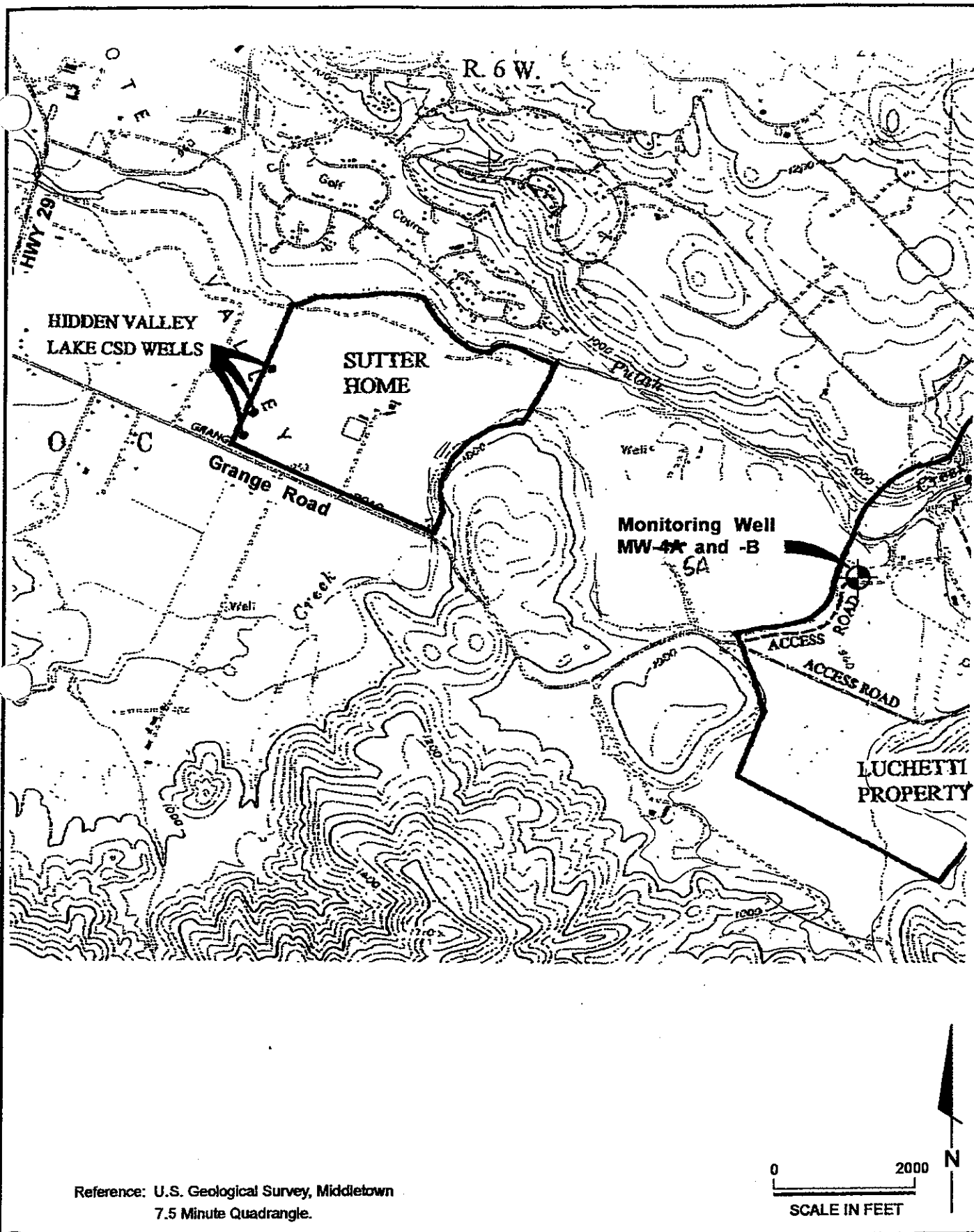
David H. Peterson
Engineering Geologist - 1186



Attachments: Location Map, Plate 1
 Log of Boring MW-4A and B, Plate 2
 Unified Soil Classification System, Plate 3

DHP:dhp\1080701.MWI

Original and two copies submitted



Log of Boring MW-4A and B

Job Number 108.07.01 Date Completed 6-1-98
 Drilling Method 7-7/8" Rotary Wash Depth 100 ft
 Logged by DHP Elevation
 Description

Laboratory Data

MW-4A
 MW-4B

7-7/8 inch diameter
 borehole 0 to 100 ft

2 inch diameter Sch 40
 PVC Blank casing,
 0 to 90.0 ft

2 inch diameter Sch 40
 PVC Blank casing,
 0 to 30.0 ft

Bentonite - cement seal
 0 to 16.0 ft

Bentonite pellet seal
 16.0 to 20.0 ft

Lonestar #3 sandpack,
 20.0 to 100.0 ft

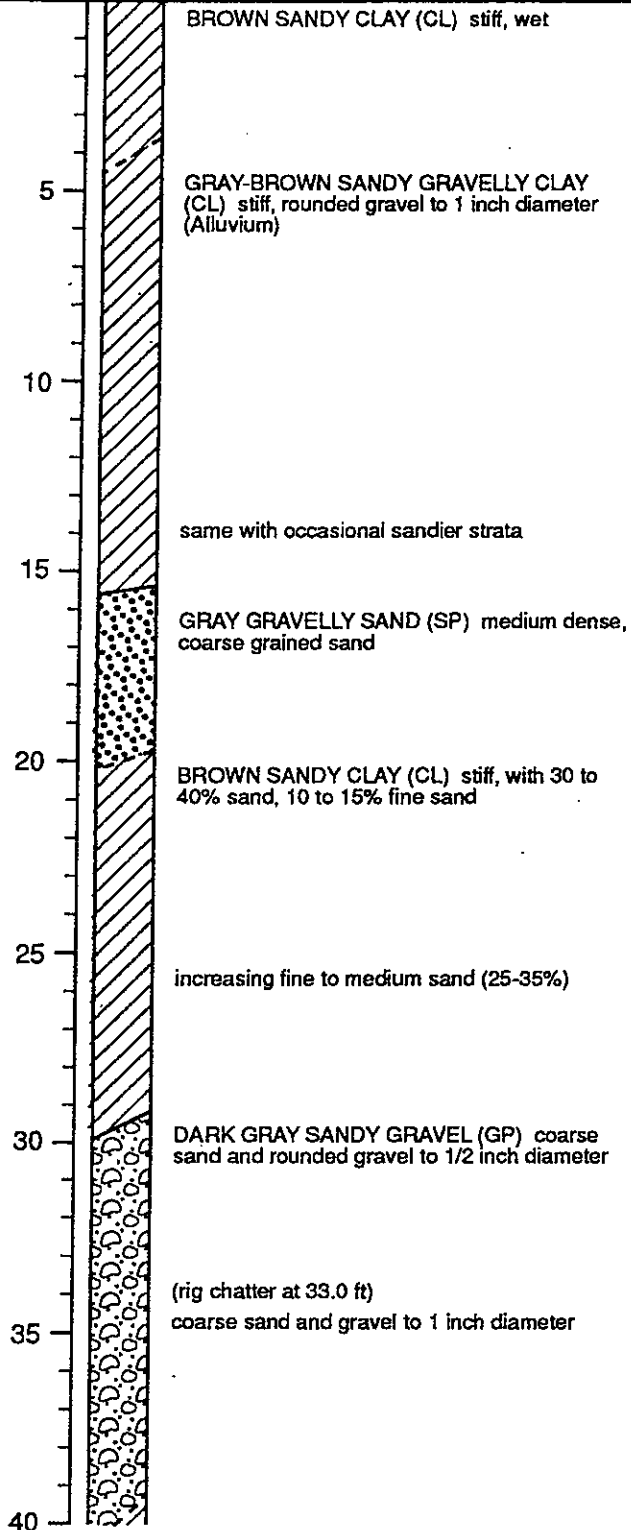
2 inch diameter slotted
 0.02 screen, 30.0 to 40.0 ft

Locking steel
 well vault

(N) Blows /ft.

Depth Feet

Graphic Log



Log of Boring MW-4A and B, cont.

Job Number 108.07.01 Date Completed 6-1-98
 Drilling Method 7-7/8" Rotary Wash Depth 100 ft.
 Logged by DHP Elevation _____
 Description _____

Laboratory Data

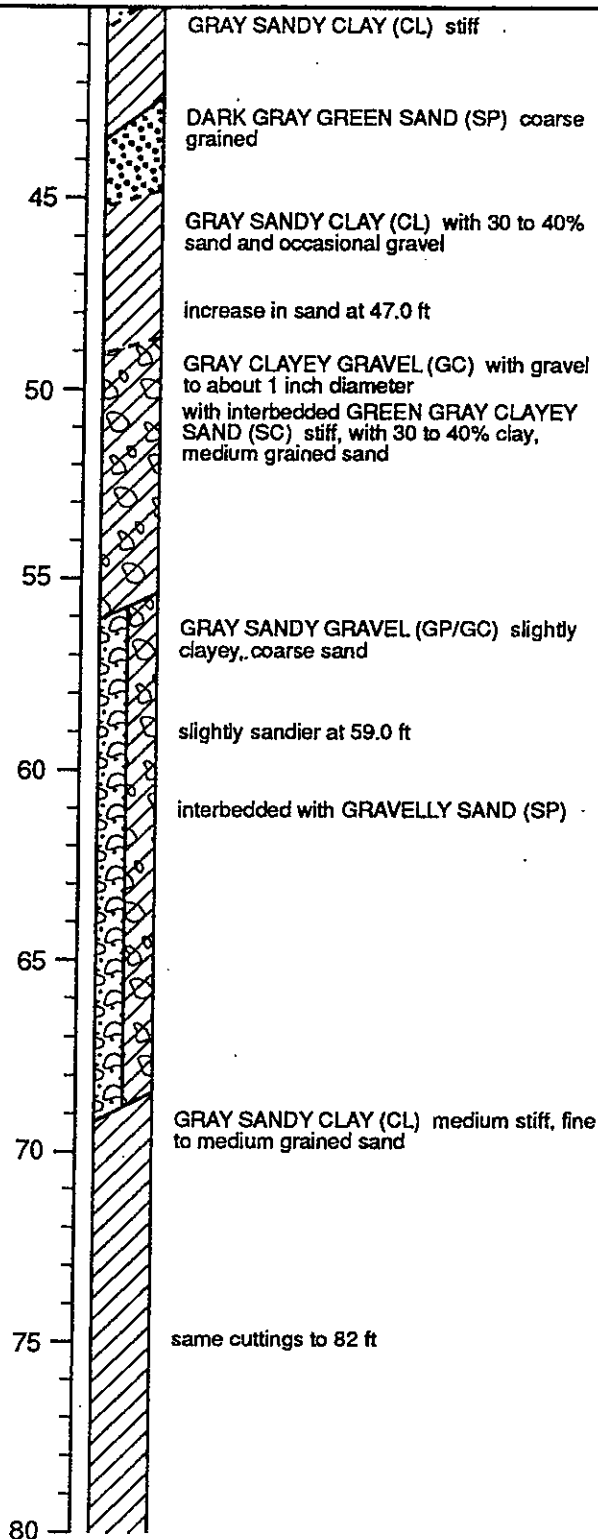
MW-4A

Lonestar #3 sandpack,
20.0 to 100.0 ft

(N) Blows /ft.*

Depth Feet

Graphic Log



Log of Boring MW-4A and B, continued
 Hidden Valley Lake CSD
 Lake County, California

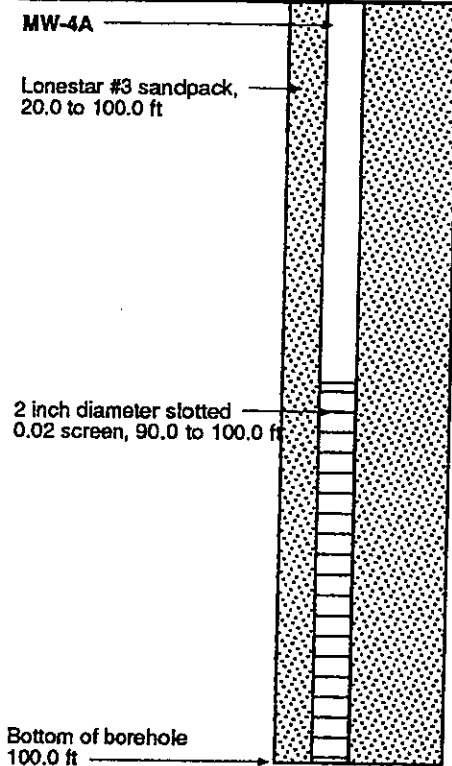
PLATE

2

Log of Boring MW-4A and B, cont.

Job Number 108.07.01 Date Completed 6-1-98
 Drilling Method 7-7/8" Rotary Wash Depth 100 ft
 Logged by DHP Elevation _____
 Description _____

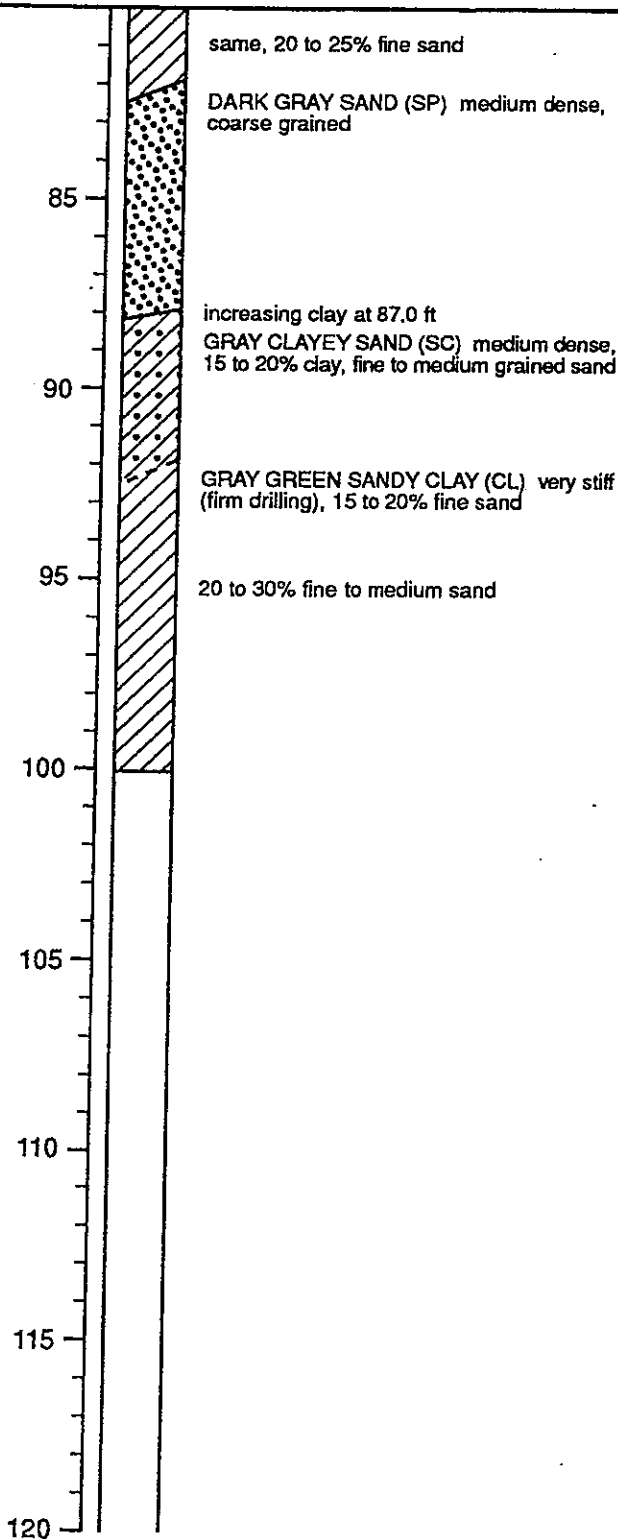
Laboratory Data



(N) Blows /ft.

Depth Feet

Graphic Log



Log of Boring MW-4A and B, continued
 Hidden Valley Lake CSD
 Lake County, California

PLATE

2

MAJOR DIVISIONS					TYPICAL NAMES
COARSE-GRAINED SOILS MORE THAN HALF IS COARSER THAN NO. 200 SIEVE	GRAVELS MORE THAN HALF COARSE FRACTION IS LARGER THAN No. 4 SIEVE SIZE	CLEAN GRAVELS WITH LITTLE TO NO FINES	GW		WELL GRADED GRAVELS WITH OR WITHOUT SAND, LITTLE OR NO FINES
			GP		POORLY GRADED GRAVELS WITH OR WITHOUT SAND, LITTLE OR NO FINES
		GRAVELS WITH OVER 12% FINES	GM		SILTY GRAVELS, SILTY GRAVELS WITH SAND
			GC		CLAYEY GRAVELS, CLAYEY GRAVELS WITH SAND
	SANDS MORE THAN HALF COARSE FRACTION IS SMALLER THAN No. 4 SIEVE SIZE	CLEAN SANDS WITH LITTLE OR NO FINES	SW		WELL GRADED SANDS WITH OR WITHOUT GRAVEL, LITTLE OR NO FINES
			SP		POORLY GRADED SANDS WITH OR WITHOUT GRAVEL, LITTLE OR NO FINES
		SANDS WITH OVER 12% FINES	SM		SILTY SANDS WITH OR WITHOUT GRAVEL
			SC		CLAYEY SANDS WITH OR WITHOUT GRAVEL
FINE-GRAINED SOILS MORE THAN HALF IS FINER THAN NO. 200 SIEVE	SILTS AND CLAYS LIQUID LIMIT 50% OR LESS		ML		INORGANIC SILTS AND VERY FINE SANDS, ROCK FLOUR, SILTS WITH SANDS AND GRAVELS
			CL		INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, CLAYS WITH SANDS AND GRAVELS, LEAN CLAYS
			OL		ORGANIC SILTS OR CLAYS WITH LOW PLASTICITY
	SILTS AND CLAYS LIQUID LIMIT GREATER THAN 50%		MH		INORGANIC SILTS, MICACEOUS OR DIATOMACEOUS, FINE SANDY OR SILTY SOILS, ELASTIC SILTS
			CH		INORGANIC CLAYS OF HIGH PLASTICITY, FAT CLAYS
			OH		ORGANIC SILTS OR CLAYS OF MEDIUM TO HIGH PLASTICITY
HIGHLY ORGANIC SOILS			Pt		PEAT AND OTHER HIGHLY ORGANIC SOILS

UNIFIED SOIL CLASSIFICATION - ASTM D2487-85

Perm	- Permeability	Shear Strength (psf)		Confining Pressure	
Consol	- Consolidation	TxUU	3200	(2600)	- Unconsolidated Undrained Triaxial Shear (field moisture or saturated)
LL	- Liquid Limit (%)	(FM) or (S)			
PI	- Plastic Index (%)	TxCU	3200	(2600)	- Consolidated Undrained Triaxial Shear (with or without pore pressure measurement)
G _s	- Specific Gravity	(P)			
MA	- Particle Size Analysis	TxCD	3200	(2600)	- Consolidated Drained Triaxial Shear
	- "Undisturbed" Sample	SSCU	3200	(2600)	- Simple Shear Consolidated Undrained (with or without pore pressure measurement)
	- Bulk or Classification Sample	(P)			
		SSCD	3200	(2600)	- Simple Shear Consolidated Drained
		DSCD	2700	(2000)	- Consolidated Drained Direct Shear
		UC	470		- Unconfined Compression
		LVS	700		- Laboratory Vane Shear

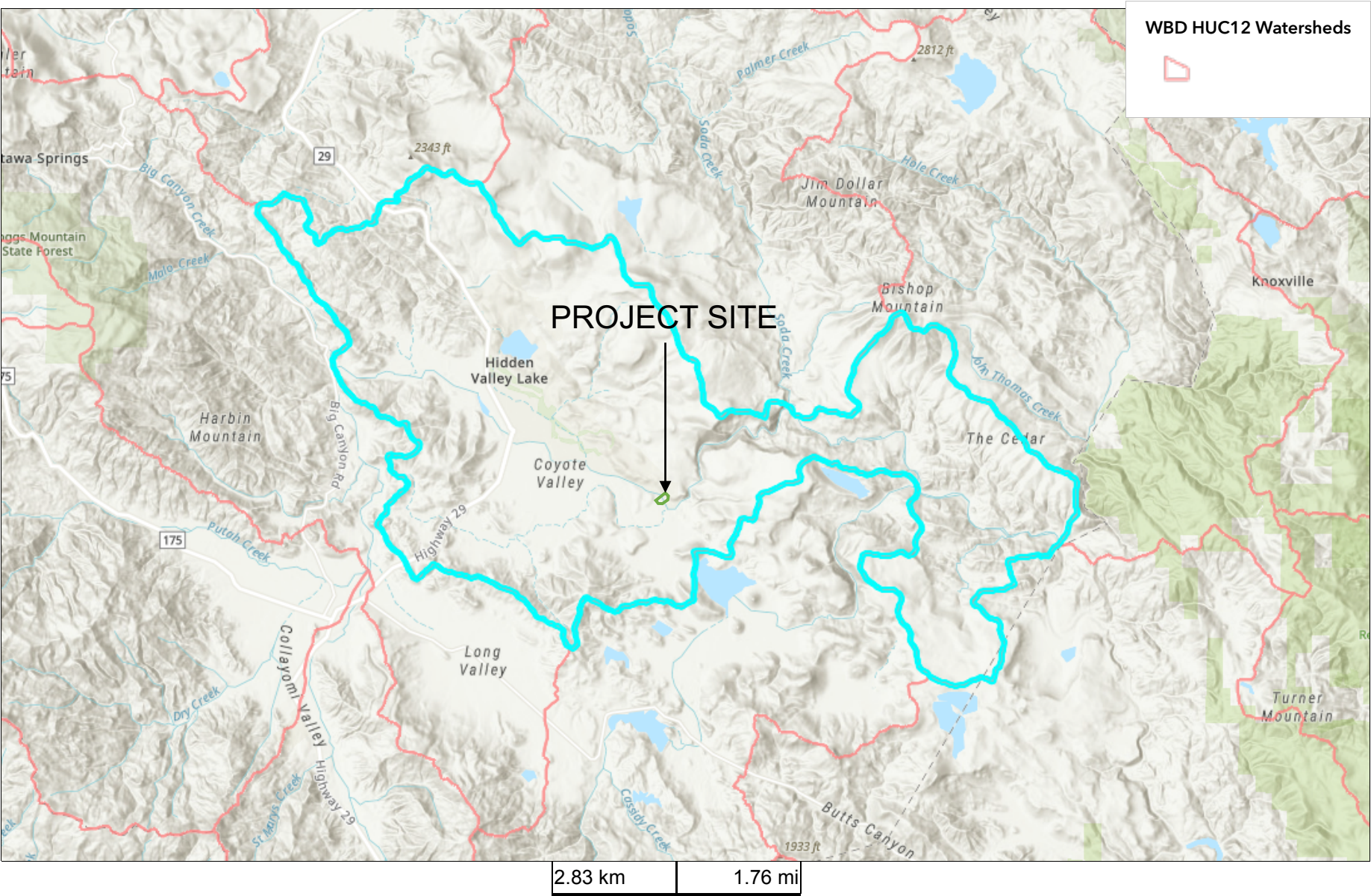
KEY TO TEST DATA

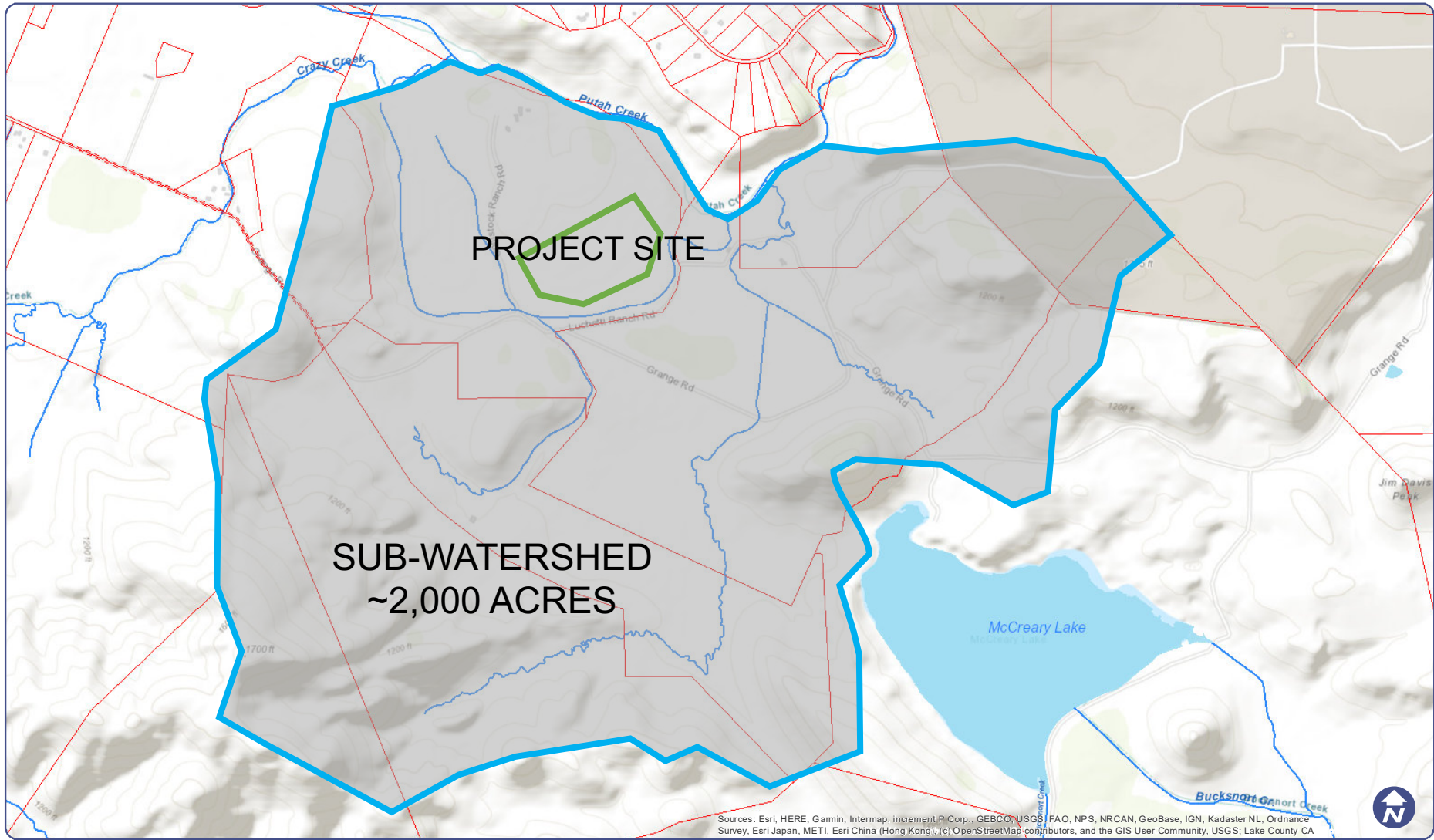
Soil Classification Chart
and Key to Test Data
Hidden Valley Lake CSD
Lake County, California

PLATE

3

Crazy Creek-Putah Creek Watershed (HUC12: 180201620307)



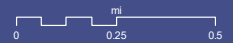


Lake County, CA

Comstock/Luchetti Sub-Watershed

built with Web AppBuilder for ArcGIS

All parcel boundaries are approximate. Discrepancies in acreage, shape and location are common. This map is not the legal survey document to be used in single site determinations. Consult your deed for a legal parcel description.



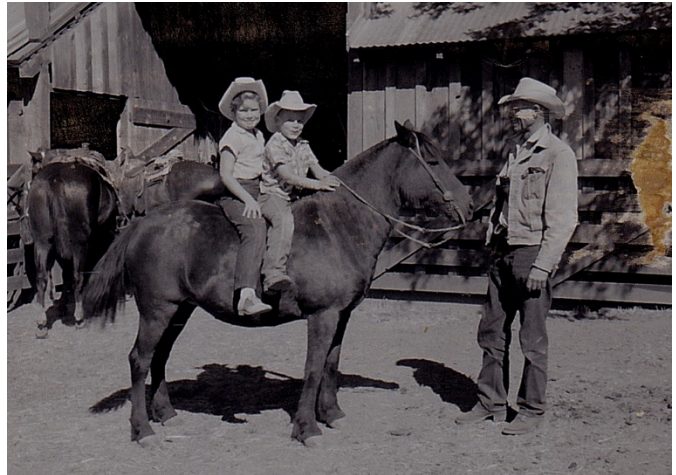
Print Date: 4/24/2024

Jim Comstock
Comstock Ranch LLC
19955 Grange Rd
Middletown CA 95461

Dear Commissioners,

I am writing to share information supplemental to the oral public comment that I will share regarding our project, Rancho Lake, (UP-21-15) which is before the Commission. I write to share some background on the land where the proposed project will be located, our family, and the process that we went through in deciding to pursue cannabis farming on our ranch.

My father, James Hilliard Comstock Jr. (Hill) came to work on the Coyote Valley Ranch in 1942. At that time, the ranch was owned by Mary Bowcher, a wealthy older woman who had moved up from San Francisco to retire to the ranching life. I was born eight years later and was raised working the ranch with my dad. Even though I was young, I understood the amount of work it took then to maintain the ranch, and also that there was little money in ranching. We still have the old ledgers showing how, more often than not the ranch struggled to break even. But, since Mary Bowcher was independently wealthy, it didn't seem to matter much to her, and my dad continued to get paid as ranch foreman.



Jim Comstock and Judy Comstock, 1955

Through a stroke of kindness and gratitude, Mary Bowcher left the entirety of the ranch to my dad upon her death. She had no living relatives, and wanted the ranch to stay with someone who loved the land. She knew that he did, and she knew also that I did. When my dad died just ten years after Mary Bowcher, I found myself, a 28-year-old kid faced with the responsibility of keeping the ranch afloat. I knew it would be a struggle, and over the years we've faced times when it seemed we wouldn't be able to hold on. Numerous people approached me as I struggled to keep the ranch shortly after my father's death, offering significant money to sell the land. While it would have been easier, and perhaps more prudent financially to sell the land, I declined these offers. My dad told me that ranching is often a rich man's game because it so often loses money, but through grazing leases, contracts with a local paving company, gravel sales to Lake County Public Works in the 1980s, hay crop leases, and other ventures, we've limped along. Even so, what little the ranch earned

was rarely enough even to pay off the taxes and insurance, and every year I've had to work extra just to make ends meet.



Jim Comstock and son James

In my lifetime the ranch has never been truly solvent or self-sustainable, but I knew that going in, and we've worked to hang on to it because we love it and because we know that it is special. Our ranch is the largest remaining contiguous section of the original Guenoc Land Grant established first in 1845 that has never been divided. It is a piece of the Middletown area cut out of time. It is also not just my home, but the homeplace of my children and grandchildren. Through the years we have bent our backs to keep it whole, even though breaking it up or selling would have been the easier option.

I'm 74 years old, and as I look to the future, I look for a way to keep the ranch in our family for the next generation. This project is the answer to that query. Cannabis offers us something we haven't had before: a crop that is profitable enough to allow the ranch to be self-sustaining, and also low enough impact that it does not adversely affect the landscape. It is the highest and best use of our farmland with the least negative impact.

As a family, we have carefully considered our options. We believe that legal cannabis is an important crop for the Lake County area and for the future of agriculture in Northern California. We have sought out partners who are responsible local farmers, who we know share our vision and love of the land. We spoke to numerous interested parties before choosing a tenant who shares our values. We have worked with them now for years in developing this project. We worked with them to choose a specific location for the particular project that would comply with all regulations while having the least possible impact. Our project will be placed on previously farmed fields, resulting in no use of land that has not been previously disturbed. Cannabis uses far less water than other less regulated crops which require no permitting or review, and the extremely high testing standards that the State of California requires for cannabis ensures that there is no risk of environmental contamination by non organic pesticides or other chemicals. In short, we have found that cannabis is a crop that can be economically viable for the least amount of physical and environmental impact on the ranch that is our home.

This project will not only allow us to keep our family ranch, it will also be a benefit to the County and to the Middletown area. It will provide jobs for agricultural laborers and generate important tax funds to better our community. Part of our contract with our tenant is the inclusion of a vegetable garden which we intend to use to share locally grown food with local entities who

feed and help our neighbors who struggle to make ends meet. I have dedicated 26 years of my life to service in public office in Lake County. I love our community, and I see this project as a way for our family to continue to give back to the community now, and into the future after I am gone.

Our family has been in Northern California for seven generations. Our ancestors on both my mother's side and my father's side have been farmers and ranchers in various locations in the North Coast Range since before The Gold Rush, and in Lake County

for nearly as long. Middletown is our home. My father and mother raised me here, and my wife Colleen and I raised our children here. Our grandchildren go to school here. This land, this place means everything to us, and we see this project as a safe and sustainable way to continue our family's ranching tradition while also being good stewards of the land that we love.

We ask the planning commission to approve this project to help us to ensure preservation of a historic family ranch, and to benefit the community of south Lake County.

Sincerely

Jim Comstock



Comstock family

5/2/24

ITEM 6b
9:20 a.m.
May 9, 2024

PLANNING COMMISSIONERS,

I WANT TO OFFER MY SUPPORT AND ENDORSEMENT
FOR THE COMSTOCK FAMILY'S RANCHO LAKE CANNABIS PROJECT.
THE COMSTOCK FAMILY HAS BEEN A PART OF THIS COMMUNITY
FOR DECADES, AND THEY HAVE BEEN GREAT NEIGHBORS AND
FRIENDS.

WE OWNED AND OPERATED THE LOCAL TOWING COMPANY
IN MIDDLETOWN FOR 20 YEARS, AND, ~~WHEN~~ IN 2015, WHEN
THE VALLEY FIRE DESTROYED MUCH OF THE AREA, JIM
COMSTOCK WAS RIGHT BY OUR SIDE, MAKING SURE THAT
WE HAD COMMUNITY SUPPORT WITH REGARD TO THE THOUSANDS
OF BURNED VEHICLES THAT WE MOVED & TEMPORARILY STORED.

I TRULY BELIEVE IN THEIR PROJECT, AND ~~THAT~~ I THINK
IT WILL PROVIDE JOBS & REVENUE FOR THE COUNTY, WHICH
WE NEED IN THESE TOUGH ECONOMIC TIMES.

THANK YOU FOR YOUR TIME,

SINCERELY


MARC HUMPHREY

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT

ITEM 6b
9:20 a.m.
May 9, 2024

Lake County Planning Commission
Lake County Courthouse
1st Floor, Board Chambers
255 N Forbes St
Lakeport, CA 95453

Re: Rancho Lake Cannabis Project

Dear Planning Commissioners,

I have lived in south Lake County for over 40 years, and I have known the Comstock family during that time. I have lived on Yankee Valley Road near the Comstock Ranch since 2016.

I know the Comstock family to be good neighbors and people who support and give to our community.

I support the Rancho Lake cannabis project, and I am pleased to see the Comstocks taking steps to ensure that their ranch stays in their family. I trust them to continue to be good stewards of the land and to manage their project in a way that brings jobs and revenue to our community by using farmland as a source of sustainable income.



Kevin Hall

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT

Lake County Planning Commission
Lake County Courthouse
1st Floor, Board Chambers
255 N Forbes St
Lakeport, CA 95453

Re: Comstock Ranch Cannabis Project

To Lake County Planning Commissioners,

I own and operate North Coast Barns, and have been a neighbor to the Comstock family ranch on Grange Road for over 25 years. During that time I have been actively involved in the Middletown agricultural community, and am happy to offer my full endorsement of the Comstock's Rancho Lake cannabis project. This project will provide work for local ag laborers and will promote sustainable and regulated agriculture that will help preserve Middletown's identity as a rural ag community.

During the more than 25 years that I've lived and worked on Grange road, Jim Comstock has been a good friend and neighbor, and I trust him and endorse his efforts on this project.



Kevin Tighe

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT

ITEM 6b
9:20 a.m.
May 9, 2024

Mike Browning -

Lake County Planning Commission
Lake County Courthouse
1st Floor, Board Chambers
255 N Forbes St
Lakeport, CA 95453

Re: Support for Rancho Lake Project on Comstock Ranch

Lake County Planning Commissioners,

I am writing to express my support for the Rancho Lake cannabis project on the Comstock Ranch. I have known the Comstock family for over twenty four years and have worked with Jim in his role as both county supervisor and local rancher. Since 2003 I have run cattle on the Comstock Ranch through a grazing lease and plan to continue to do so for the foreseeable future.

As a rancher myself, I know the challenges that come with trying to manage and maintain a family ranch. I support the Comstock family in their efforts to diversify their ranching business in a sustainable and beneficial way, and I look forward to continuing to work with them in the future.

Lake County and Middletown will benefit from this project, and I am happy to offer the Comstocks my full endorsement.

Sincerely,

Mike Browning
Mike Browning

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT

ITEM 6b
9:20 a.m.
May 9, 2024

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT

Lake County Planning Commission
Lake County Courthouse
1st Floor. Board Chambers
255 N Forbes St
Lakeport. CA 95453

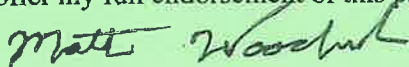
Re: Rancho Lake Project

Lake County Planning Commissioners,

I first met Jim Comstock in 1986 when he hired me to work at Hardester's Market in Middletown. I was new to the area, and Jim welcomed me and helped me get myself established. In the decades since then, I've worked closely with him on multiple ventures in the Middletown community and seen firsthand the love he has for this place. In addition to his work as a public servant both on the Middletown School Board and the Lake County Board of Supervisors, Jim and his family have worked as volunteers in service projects, fundraisers, and other charitable endeavors. Jim has dedicated his life to Middletown.

I've also devoted my life to this community as a volunteer, a small business owner, and member of several community boards. I live in Hidden Valley, and I have recently retired from managerial positions in the Hidden Valley Lake Association. I want what is best for our community, and I believe that the Comstock family's project fits. It promotes ag, benefits the county, and is a sustainable business opportunity.

I offer my full endorsement of this project.



Matt Woodard

ITEM 6b
9:20 a.m.
May 9, 2024

Lake County Planning Commission
Lake County Courthouse
1st Floor, Board Chambers
255 N Forbes St
Lakeport, CA 95453

Re: Supporting Comstock Ranch Project

Lake County Planning Commission,

As a neighbor and friend of the Comstock family, I support their cannabis project. I've lived with my family on Grange road for nearly twenty years, and I also have my business there. Jim Comstock and his family have always offered their strong support of my small business, and I appreciate his efforts to establish legal cannabis in the area.

I have known Jim my whole life, and trust him to have the best interest of the Middletown community, as well as our Grange road community, at heart as he works to manage the family ranch.

I support him and his project, and encourage the county to do the same.



Kevin McMahon

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT

Lake County Planning Commission
Lake County Courthouse
1st Floor, Board Chambers
255 N Forbes St
Lakeport, CA 95453

Re: Support for Comstock's Rancho Lake Project

To The Lake County Planning Commissioners,

I live at 19892 Grange Road, next to the entrance to the Comstock Ranch. I am writing to express my support for the Comstock's Rancho Lake cannabis project.

I have been a neighbor to the Comstock family for 18 years. I know them to be good neighbors and upstanding members of the community. For several years my late husband Ernie worked with them to run a pig hunting business on their ranch as well as on other properties in the area. We enjoyed a friendly working relationship with the Comstocks, and I support their efforts to keep their ranch self-sustaining to preserve a family farm for future generations.

As a neighbor, I ask the Planning Commissioners to approve their project.

Sincerely,



Betty Sanders
19892 Grange Rd
Middletown, CA 95461

RECEIVED

MAY 06 2024

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT