Exhibit 5-A — Procedural Violations Summary Box

Poverty Flats Ranch UP 23-09 / IS 23-20 (Project No. PL 25-198) Chapter 5 — Procedural and Administrative Compliance Violations (Sorted by jurisdictional severity — Federal → State → County/Local)

Federal / Cross-Jurisdictional Violations

Citation Brief Description

NEPA (42 U.S.C. § 4332) Environmental review required for actions

affecting federal lands not conducted.

FLPMA (43 U.S.C. § 1761 et seq.) Federal right-of-way authorization required

for commercial transport across BLM land.

18 U.S.C. § 1001 False statements or material omissions

made in official records or hearings.

State Law / CEQA / Professional Compliance

Citation Brief Description

CEQA Guidelines § 15125(a) Project description and environmental

setting incomplete or inaccurate.

CEQA Guidelines § 15088(b) Failure to respond in good faith to public

and agency comments prior to approval.

CEQA Guidelines § 15073.5 Substantial ISMND changes required

recirculation that was not performed.

CEQA Guidelines § 15090(a)(2) Findings and responses omitted from the

official record of decision.

Bus. & Prof. Code § 5536 Project plans lacked licensed

architect/engineer stamp and signature.

Bus. & Prof. Code § 6735 Engineering documents not signed and

sealed by responsible licensee.

PRC § 4290 / 14 CCR § 1273.01 Road access and turnouts fail to meet fire-

safe emergency-vehicle standards.

Defensible-space and vegetationmanagement provisions not satisfied.

County / Local Procedural Violations

Citation	Brief Description
Lake County Code Ch. 30 (Grading Ordinance)	Complex grading permit required for > 50 cu. yds.; unpermitted grading conducted.
Lake County Code Ch. 21 (Zoning – Use Permits)	Major Use Permit approved without complete and accurate environmental record.
Lake County Code Ch. 13 (Fire Safety Standards)	Local fire-access and construction standards not verified through inspection.
Gov. Code § 6253(c)	Failure to produce public records or maintain PRA log violates transparency law.
County Administrative Procedures Manual § 2.5	Staff reports lacked required attachments and evidence provided to Commission.

Summary Note: This exhibit consolidates all procedural and administrative violations identified in Chapter 5, aligning each citation to its governing authority. The violations demonstrate systemic non-compliance across federal, state, and county levels, forming the procedural foundation for Appellant's CEQA-based Appeal No. PL 25-198.