

From: Dorothy Knobloch <simbamson@att.net>
Sent: Wednesday, March 5, 2025 3:02 PM
To: Lake County Community Development - Cannabis <mbx.CDD_Cannabis@lakecountyca.gov>
Cc: yolanda.calybon@lakecountyca.gov
Subject: [EXTERNAL] MIT Farms Major Use Permit (UP 24-01) Initial Study (24-01)

Planning Department,

This e-mail is in reply to (County of Lake Notice of Intent to Adopt a Mitigated Negative Declaration letter.)

Re: MIT Farms Major Use Permit (UP 24-01) Initial Study (24-01)
Property Location: 22368 and 22430 Jerusalem Grade, Lower Lake CA 95457
APN No: 136-071-02 and 136-071-03

I would appreciate a reply to the questions I have regarding this project.

How will this affect the ground water at property located 22832 Jerusalem Grade, Middletown, CA 95461

Who is "MIT Farms" and where is their corporate office. At the bottom of the letter in very small letters (CHINA) appears. Is this a China project?

Who is giving the water rights to MIT Farms to retrieve the ground water and is the property leased or owned.

How far are the said properties located from 22832 Jerusalem Grade, Middletown, CA 95461

Where is the imported organic soil mixture imported from

How much runoff from the drip system will go into the ground water

Sincerely,

Dorothy Knobloch
e-mail: simbamson@att.net
Tele: 1-818-998-4704



May 17, 2024

Thank you for the opportunity to comment on UP 24-01 MIT Farms, 22368 & 22430 Jerusalem Grade.

The following are comments for the project:

Lower Lake / Middletown, CA 954571. Page 21 MIT Farms PMP states: There is a low potential for nesting raptors and other nesting migratory bird species protected under the MBTA to occur within the proposed areas of disturbance within the subject parcels given the high level of disturbance along the existing access roads and locations of the Ag wells and water storage structures, and due to the invasive nature of the non-native annual grasslands that dominate the proposed cannabis cultivation sites.

Comment: But page 23 contradicts this, last paragraph: Impacts to Protected Nesting Birds The trees and vegetation within the subject parcels (see Photo Log in the appendices attached) contain marginal suitable habitat for nesting raptors and MBTA protected nesting bird species.

Comment: With hundreds of bird species seen in Lake County, 100 reported on eBird in March 2024, we note the biologist identified only 7 species. Could an in-depth bird report be done and importantly to note is the presence of California Towhees, Western Meadowlarks, Western Bluebirds, California Thrasher, and Wrentits which are very numerous in this area. There was no mention of the numerous bats that live in the area either. No reptiles nor amphibians or insect sightings were noted in the biological report.

2. "Special-status plant species with potential to occur within the Project area and their blooming season, which were identified by Mr. Matuzak from Greg Matuzak Environmental Consulting LLC, were based on the conclusions of the Biological Resources Assessment (dated December 2023) covering the proposed Project area". Survey done March 31 and April 28

Comment: 2 paragraphs" The survey should be focused on rare plants...performed during the blooming period of the majority of target species"

3. Table C on page

-comment: The second edition of The Jepson Manual (TJM2; Baldwin, et al. 2012) lists 56 native species (14 subspecific taxa) and eight non-native species (three subspecific taxa). Our rushes are primarily restricted to soils that are at least moist well into the dry season, occurring in fresh/alkaline/saline marshes, meadows, seeps, springs, creek banks, washes and pools.

It was raining on the March 31st visit, were any notes of amphibians and reptiles observations taken at the water crossing the cultivation site?

Protecting our watersheds is of high importance in the GPAC 2050 3, MIT Farms PMP pg. 3 states: “Soda Creek, an intermittent Class I watercourse, flows from north to south through the Project Property. Multiple unnamed ephemeral and intermittent watercourses flow through the Project” Property into Soda Creek.

pg. 19 photo 8. Noting the ephemeral drainage that will flow into the cultivation site, what are Fish and Wildlife’s recommendations for conservation?

Comment 4: What negative effects t Soda Creek will there be and how will it be mitigated?

Comment 5: Page 9 figure 2 Project Location Map appears to show hundreds of Blue Oaks. How many oak trees are planned to be removed?

Comment 6: Orcutt Grass has the possibility of being located in more areas of the project.

MIT Farms PMP page 21 first paragraph: “Additionally, there is federally mapped Designated Critical Habitat (DCH) within the Project area for the slender Orcutt grass (USFWS 2023 – see Appendix G) and it has been mapped to the west of the Project area.”

Comment 7: A Cannabis Waste Composting Management Plan is needed: Separate Cannabis Waste. Even within cannabis waste, there are several types of waste materials, including: Plant waste (leaves, stems and roots).

Manufacturing waste (generated during the extraction, distillation, and refinement of cannabis products).

Soil (which could be contaminated with pesticides or other chemicals).

Operators may also generate other types of waste streams, from packaging waste to laboratory waste and even electronic waste.

While some of the waste streams above like plant waste are generally non-hazardous, others are considered hazardous. In California, even most types of electronic waste have hazardous components.

It's critical to keep cannabis waste or marijuana waste separate from other waste products.

Mixing cannabis waste with other types of waste can also create hazardous working conditions for workers who dispose of the waste, unaware that the items they are handling are potentially contaminated with a harmful substance.

Secure Cannabis Waste: After separating waste, it's important to use designated waste containers that are clearly labeled and kept in a secure location. Employees should be aware of which containers are designated for cannabis waste, and which waste is considered hazardous.

Secure containers should be used to store waste on-site, when preparing it for shipment and transporting it to a disposal facility.

The best cannabis waste disposal companies will provide a with UN-rated containers to ensure the secure handling of waste. UN-rated containers are air-tight and offer maximum odor protection.

The containers should also include biodegradable lining to ensure proper hygiene and should meet any state regulations in place to prevent odor and spillage. Cannabis materials can emit strong odors, which may lead to complaints and subsequent violations.

While these containers themselves are secure, it's important to store these containers in a secure location where they cannot be accessed by someone without authorization.

Some Waste Must Be Rendered Unusable. If any type of cannabis waste comes in contact with THC, at the end of the waste management process, you must render it unusable and cannabis waste disposal guidelines unrecognizable.

There are additional defined times in which cannabis waste must be rendered unrecognizable and unusable as well. For example: When cannabis flowers or products don't meet testing or quality requirements, they must be rendered unusable before disposal.

Recalled cannabis flowers or products must be rendered unusable after a minimum 72-hour quarantine prior to disposal.

Thank you for considering the above comments.

Donna Mackiewicz, president

Redbud Audubon Society

www.redbudaudbon.org Email: redbud.audubon@gmail.com