July 9, 2026

To Mary Claybon, Planner mary.claybon@lakecountyca.gov
Clerk of the Board, Board Agenda clerkoftheboard@lakecountyca.gov
Administrator, Carolyn Purdy carolyn.purdy@lakecountyca.gov

URGENT: Rebuttal Materials for July 11, 2026 Formal Appeal of Major Use Permit PL-25-71 (Pasta Farms) – Submission of Evidence Package

Dear Ms. Claybon and Madam Clerk:

Please find attached the final Consolidated Evidence Package for the upcoming Board of Supervisors proceeding regarding the Pasta Farms expansion (PL-25-71). This package is submitted on behalf of our local Firewise Community framework and contains critical engineering, technical, and regulatory evaluations.

The package consists of the following consecutive components:

1. **Formal Cover Letter:** Outlining the principal fire mitigation and community safety issues.
2. **Technical Brief:** Specifying gaps in proposed on-site infrastructure and structural fire hazards.
3. **Joint Cumulative Fire and Evacuation Analysis:** Detailing basin-wide logistical constraints.
4. **Technical Addendum of Enforceable Performance Standards:** Providing objective, real-time metrics for risk reduction, aligned to strict CAL FIRE operational criteria and Chapter 14 of the California Code of Regulations.
5. **Expert Statements:** Includes assessments from the Fire Marshal at The Mouontain Of Attention Sanctuary and a relevant CAL FIRE letter previously submitted as a response to a separate request from the County

We request that this evidence be entered into the official Administrative Record for the upcoming hearing. Please confirm receipt of this submission and advise if any additional steps are required to ensure these materials are fully integrated into the official record for the Board of Supervisors' consideration.

Thank you for your assistance in this matter.

Sincerely,

Magdalena Valderrama Hurwitz

Chair, Seigler Springs Firewise Community

Wally Muszynski

CEO, Holy Domains / The Mountain of Attention Sanctuary

Consolidated Evidence Package: Formal Appeal of Major Use Permit PL-25-71 (Pasta Farms)

1. **Formal Cover Letter: Establishing Standing** ..... Page 1
   (Credentials of Magdalena Valderrama Hurwitz, Chair, Seigler Springs Firewise Community and Firewise Community regional coordinator, and Wally Muszynski, CEO for Holy Domains / The Mountain Of Attention Sanctuary, the neighboring landowner)

2. **Technical Briefing: Summary of Fair Argument & Gaps** ..... Page 3
   (Specific deficiencies in the current PL-25-71 administrative record)

3. **Joint Cumulative Analysis: Seigler Springs Basin**
   - I. Fire Safety, Emergency Access, and Evacuation Flow Bottlenecks ..... Page 4
   - II. State-Mandated Forestry Protections & Timberland Conversion Violations ..... Page 7

4. Administrative Record Appendix: Expert Scientific Reports
   - Exhibit A: Duncan Gamlen, Fire Marshal Safety Assessment ……..... Page 18
   - Exhibit B: Kimberley Sone, CAL FIRE Division Chief of Resource Management Formal Statement ..... Page 42

Date: July 6, 2026

To: Lake County Board of Supervisors

From:

- **Magdalena Valderrama Hurwitz**, Chair, Seigler Springs Firewise Community; Regional Coordinator, Lake County COAD
- **Wally Musyzinski,** CEO, Holy Domains / Mountain of Attention Sanctuary, Neighboring Landowner and Long-Standing Sensitive Receptor

Subject: Formal Submission of Technical Objections and Cumulative Impact Analysis Regarding Major Use Permit PL-25-71 (Pasta Farms)

Honorable Supervisors,

We are formally submitting this **Consolidated Evidence Package** to establish our collective standing and to provide the "Fair Argument" required under the California Environmental Quality Act (CEQA) to necessitate a full Environmental Impact Report (EIR) for Major Use Permit PL-25-71. Our opposition is not a generic objection to cannabis, but a fact-based professional assessment of regional safety and land-use incompatibility.

I. Strategic Authority and Regional Boundary Standing

The **Seigler Springs Firewise Community** represents a disaster-preparedness boundary encompassing **The Mountain Of Attention Sanctuary** and **Seigler Springs Investment LLC**. While the Board's July 11 hearing focuses on **Major Use Permit PL-25-71 (Pasta Farms)**, the Board is legally obligated under the California Environmental Quality Act (CEQA) to evaluate the cumulative impacts of the Pasta Farms 30.11-acre industrial canopy alongside the adjacent 80-acre Seigler Springs North expansion (PL-26-115) (scheduled for hearing on August 4) because the simultaneous development of these operations creates a critical "cumulative tipping point" that establishes a clear basis for cumulative impacts under CEQA, threatening the safety and resource stability of the entire basin.

Our standing is grounded in the landmark ***Bonta v. Lake County*** precedent, in which a California appellate court ruled that a lead agency's failure to conduct a realistic, site-specific evacuation analysis under catastrophic wildfire conditions invalidates the project's environmental record. This precedent applies directly to the Seigler Springs basin of which Pasta Farms is a part.

II. Standing of Holy Domains (The Mountain Of Attention Sanctuary)

Led by CEO **Wally Muszyinski**, Holy Domains has operated **The Mountain Of Attention Sanctuary**—a 50+-year established retreat space and sensitive receptor—immediately adjacent to the project site. As a direct neighbor within the Firewise boundary, Holy Domains holds critical standing to challenge the project's land-use incompatibility. This includes:

- **The "Amphitheater Effect":** The unique, bowl-like topographic geometry of the basin reflects, amplifies, and intensifies industrial mechanical noise and low-frequency HVAC hum directly into sacred retreat zones.
- **Wildfire Vulnerability:** The unmitigated felling of the shared, fire-resilient oak canopy leaves both properties deeply exposed to rapid wildland fire propagation in a Very High Fire Hazard Severity Zone.

III. Summary of Technical "Fair Argument" Gaps

This package provides uncontroverted expert evidence demonstrating that the Mitigated Negative Declaration (MND) relies on superficial, generic "box-ticking" mitigations that fail to address the operational and topographical realities of the Seigler Springs basin:

- **Evacuation Capacity and Tiered Egress Load:** The record contains a total data gap regarding emergency egress. The County's analysis assumes a skeletal daily crew of 3–5 workers, completely ignoring seasonal peaks where harvest and processing operations may bring 100+ industrial employees onto the site. The July 9, 2026 assessment of the Fire Marshal at The Mountain Of Attention confirms this deficiency (Exhibit A), stating that the current record lacks the project-specific evaluation required to determine how the transportation network would function under realistic wildfire conditions. The Fire Marshal explicitly identifies the need for an analysis of "cumulative evacuation demand" and "operational roadway performance," validating our position that the current reliance on generic standards—without a vetted, project-specific Evacuation Flow Analysis approved by the South Lake Fire Protection District (SLFPD)—is insufficient to ensure life safety during a simultaneous, compressed egress of an expanded industrial workforce and local residents.
- **Acoustic Topographic Amplification:** The existing noise conditions (Section I, Conditions 1–2) relate to decibel levels and operational hours but do not account for topographic amplification effects. Generic noise conditions assume flat, unobstructed terrain. The record fails to model low-frequency mechanical hum within a natural acoustic amphitheater, violating CEQA's requirement to accurately analyze project impacts against the true industrial baseline.
- **Unquantified and Deficient Fire-Flow Storage:** While Condition L.4 mandates a dedicated fire suppression hookup, it fails to specify any mandatory minimum water storage capacity (in gallons) scaled to a massive 30.11-acre industrial facility. Relying on unquantified infrastructure translates to an unenforceable administrative placeholder, leaving the community entirely unprotected during a fire breakout.
- **Ecological Loss:** Under Condition D.2, the removal of 362 mature, fire-resilient oaks creates a multi-century "functional gap" that cannot be rectified by the applicant's reliance on speculative acorn-basin planting. The proposed 3:1 mitigation ratio fails to account for the high mortality rate of oak recruitment and ignores the immediate, long-term loss of vital ecosystem services—including carbon sequestration, erosion control, and canopy shade—that take decades, if not centuries, to replace. By failing to provide a mitigation strategy that ensures successful, functional replacement of these mature services, the project fails to meet the CEQA standard for full mitigation and instead exacerbates regional wildfire risk through increased surface fuel curing, or drying out, a direct consequence of removing this protective canopy.
- **Operational and Meteorological Controls:** The current permit relies on reactive, state-level warnings. To protect the basin, the project must require an on-site meteorological station with real-time telemetry to trigger immediate operational halts when local humidity drops below 30% or wind speeds exceed Calfire's strict standard of 10 MPH, independent of regional Red Flag status.

IV. Regulatory Non-Compliance: Unauthorized Timberland Conversion

New evidence dated June 17, 2026 from the California Department of Forestry and Fire Protection (CAL FIRE) via Division Chief Kimberley Sone (Exhibit B, Formal Statement from Calfire Forester) to the county, establishes that the presence of commercial timber species in the project area (including Ponderosa pine, Douglas-fir, incense cedar, and black oak) means the wholesale felling of mature oaks constitutes unpermitted "timber operations" on "timberland" under 14 CCR § 895.1. The applicant's reliance on "Other Lands" mapping is therefore legally insufficient. The Board must

require a valid Timberland Conversion Permit or certified exemption disclosure before any grading or tree removal proceeds.

This regulatory omission, coupled with the project's reliance on reactive, state-level warnings and the absence of a site-specific operational evacuation flow analysis, highlights a systemic failure to address critical public safety and compliance mandates in the current record. These unmitigated risks demonstrate that the current MND is both legally and technically insufficient. We urge the Board to acknowledge the combined authority of these two entities and either deny the permit or mandate a basin-wide Environmental Impact Report (EIR).

Respectfully,

Magdalena Valderrama Hurwitz

Chair, Seigler Springs Firewise Community

Wally Muszyinski

CEO, Holy Domains / Mountain of Attention Sanctuary

June 9, 2026

To: Lake County Board of Supervisors

From: Magdalena Valderrama Hurwitz, Chair, Seigler Springs Firewise Community

Subject: Technical Objections to Major Use Permit PL-25-71 (Pasta Farms)

I. Fire Safety & Evacuation: Unverified Egress Capacity for the The "Uncounted" Seasonal Load

The project site is located within a "Very High Fire Hazard Severity Zone," where emergency egress must be modeled against actual operational peaks.

- **The Gap:** There is no Site-Specific Evacuation Flow Analysis vetted by the South Lake Fire Protection District (SLFPD). Crucially, the current record evaluates traffic based on a skeleton crew of 3–5 daily workers, ignoring the seasonal reality where normal cannabis harvesting and processing can require **100+ industrial employees**. As wildfire onset is unpredictable, the County has failed to prove that the constrained Seigler Springs North Road can handle this peak "tiered load" exiting simultaneously with residents.
- **The Demand:** The Board must mandate an SLFPD-approved Evacuation Flow Analysis study that models the "Worst-Case Scenario" of a 100+ person workforce egress. Additionally, fire suppression water capacities must be explicitly scaled in gallons to the 30.11-acre footprint.

II. Ecological Degradation & Regulatory Failure: The Oak Woodland "Functional Gap"

The removal of 362 mature oaks at Pasta Farms, especially when combined with the proposed impacts of the adjacent Seigler Springs North project (438 total cumulative oaks), constitutes a landscape-level conversion that remains unmitigated and legally non-compliant.

- **The Functional Gap:** Replacing mature 24–40" DBH oaks with 7-inch seedlings is a symbolic exercise; these seedlings require 150–300 years to reach the functional, canopy maturity of the trees they replace.
- **Regulatory Non-Compliance:** The California Department of Forestry and Fire Protection (CAL FIRE) has confirmed the presence of commercial timberland species on-site, including Ponderosa pine, Douglas-fir, and incense cedar, see Exhibit C. Their presence confirms the site's status as "timberland" under 14 CCR § 895.1 and invalidates the County's reliance on "Other Lands" mapping.
- **The Demand:** We demand strict onsite wood sanitation protocols. Furthermore, the Board must compel the Applicant to produce a valid **Timberland Conversion Permit** and a formal, RPF-certified disclosure. This oversight—combined with the Fire Marshal's findings on high wildfire risk and inadequate evacuation analysis—demonstrates a systemic failure in the current administrative record to address the project's actual environmental and public safety impacts.
- **Regulatory Non-Compliance & Timberland Conversion:** The proposed removal constitutes "timber operations" on "timberland" under 14 CCR § 895.1. This package includes **Exhibit A** (a formal statement from the Fire Marshal) and **Exhibit B** (a formal statement from a Calfire resources division chief) , which collectively confirm that the applicant has failed to secure a mandatory Timberland Conversion Permit from the state. The County's reliance on superficial "Other Lands" mapping is legally invalid.
- **The Demand:** The Board must compel the Applicant to produce a valid Timberland Conversion Permit issued by Calfire, or provide an RPF-certified disclosure of a specific

regulatory exemption, prior to any grading, tree removal, or permit activation.

III. Acoustic Impacts: The "Amphitheater Effect"

Standard noise ordinances fail in the unique geography of the Seigler Springs basin.

- **The Gap:** The basin functions as a natural acoustic amphitheater, reflecting and intensifying the low-frequency mechanical hum of industrial ventilation into residential pockets.
- **The Demand:** A site-specific acoustic study modeling topographic reflection to ensure noise levels are not exceeded in the actual residential environment.

V. Operational & Meteorological Controls

- **The Gap:** Current mitigation relies on reactive, state-level "Red Flag" warnings that do not reflect local micro-climates.
- **The Demand:** Requirement for an **on-site meteorological station** with real-time telemetry to trigger immediate operational halts (e.g., motorized transport, ventilation maintenance) when local humidity drops below 30% or wind speeds exceed the strict Calfire standard of 10 MPH.

Mandatory Action Requested: To comply with CEQA's "Fair Argument" threshold, the Board must deny Major Use Permit PL-25-71 or mandate a full Environmental Impact Report (EIR) that integrates these site-specific technical standards.

Cumulative Fire and Evacuation Analysis: Seigler Springs Basin

To: Lake County Board of Supervisors

From: Magdalena Valderrama Hurwitz, Chair, Seigler Springs Firewise Community

Date: July 09, 2026

Subject: Cumulative Public Safety and Emergency Egress Risk (PL-25-71 and PL-26-115)

EXECUTIVE SUMMARY: THE EVACUATION "TIERED LOAD" FAILURE

The environmental reviews for Pasta Farms (PL-25-71) and Seigler Springs North (PL-26-115) rely on perfunctory 'box-ticking' that ignores the operational reality of the Seigler Springs basin. The Board must require a full Environmental Impact Report (EIR) because the current record fails on three critical fronts:

1. **Cumulative Evacuation Risk:** The project ignores the 'simultaneous egress' problem, failing to prove the constrained basin roads can support the combined workforce and resident population during a wildfire.
2. **Infrastructure Ambiguity:** Inconsistent fire suppression water capacity (Section II) and lack of scaled specifications leave public safety measures unverified.
3. **Reactive Safety Protocols:** Relying on state-level Red Flag warnings instead of on-site telemetry (Section III) exposes the community to unnecessary risk.

These fundamental flaws create a 'Fair Argument' under CEQA for a full EIR to address the cumulative threat to public safety.

The Principal Risk: In a "Very High Fire Hazard Severity Zone," the simultaneous egress of industrial employees and residents on narrow, mountainous roads—unvetted by local fire districts—presents a high probability of bottlenecking, trapping both civilians and emergency responders.

I. CUMULATIVE WORKFORCE EVACUATION LOAD

The Board is legally mandated to evaluate the cumulative impact of development on community evacuation routes, as established in *Bonta v. County of Lake*.

- **The "Simultaneous Egress" Problem:** Pasta Farms (30.11-acre canopy) and Seigler Springs North (massive dual-parcel operation) will introduce a significant daily workforce. Current plans do not account for the "worst-case scenario" where this industrial workforce must flee at the same moment residents are evacuating.
- Because the evacuation corridor is severely constrained, even incremental additions of industrial traffic from smaller operations—when combined with the baseline residential and larger project traffic—create a cumulative risk that could trigger a catastrophic failure of the evacuation route during an emergency.
- **Infrastructure Constraints:** Seigler Springs North Road is a constrained corridor. The current record lacks a **Site-Specific Evacuation Flow Analysis** that proves this road can handle the added traffic volume of heavy farm equipment, distribution vehicles, and employees during an active fire.

II. UNVERIFIED FIRE SUPPRESSION INFRASTRUCTURE

A "stable project description" is a fundamental CEQA requirement, yet the current infrastructure plans are riddled with inconsistencies.

- **"Hidden" Water Capacity:** For Seigler Springs North, there is a direct conflict between site plans showing six 5,000-gallon tanks and text referencing a seventh dedicated fire tank. This ambiguity makes it impossible to verify if fire suppression water is being "double-counted" as cultivation storage.
- **Lack of Scaled Specifications:** Pasta Farms requires a suppression tank but fails to mandate a specific gallon capacity scaled to a 30-acre operation. Without verified minimum volumes explicitly tied to the project's square footage, the "mitigation" is a symbolic administrative placeholder.

III. INADEQUATE OPERATIONAL MONITORING (PROACTIVE VS. REACTIVE)

Current mitigation measures rely on state-level "Red Flag" warnings, which are often delayed and do not reflect the micro-climates of the Seigler Springs basin.

- **On-Site Meteorological Monitoring:** To ensure public safety, the Board must require on-site weather stations with real-time telemetry.
- **Mandatory Operational Halts:** High-risk activities—such as tarp-pulling, motorized transport, and ventilation maintenance—must be halted immediately when local relative humidity drops below 30% or wind speeds exceed the strict Calfire standard of 10 MPH, regardless of whether a formal Red Flag warning has been issued by the state.

MANDATORY ACTION REQUESTED

To prevent a finding of "significant and unavoidable impact," the Board must deny these permits or mandate a comprehensive **Environmental Impact Report (EIR)** that includes:

1. A **Site-Specific Evacuation Flow Analysis** vetted and explicitly approved by the **South Lake Fire Protection District (SLFPD)** for the combined traffic load of both projects.
2. Verified, singular specifications for all fire suppression infrastructure, with **minimum water capacities** scaled to the total industrial footprint.
3. Formal coordination with the SLFPD to verify that the proposed Knox Box gated entrances and access road improvements meet modern standards for heavy emergency apparatus.

To: Lake County Board of Supervisors

From: Magdalena Valderrama Hurwitz, Chair, Seigler Springs Firewise Community; and Wally Muszynski, CEO, Adidam Holy Domains (Mountain of Attention)

Subject: Technical Addendum of Enforceable Performance Standards for Major Use Permit PL-25-71 (Pasta Farms)

I. Executive Overview: Bridging the "Functional Gap"

As representatives of the Seigler Springs Firewise Community and the Mountain Of Attention Retreat Sanctuary, we are submitting these Specific Performance Standards to address the "cumulative tipping point" of our basin's safety and infrastructure. The current environmental record relies on generic, "copy-paste" mitigation that fails to address the topographical and ecological reality of the Seigler Springs basin.

II. Technical Comparison Table: At a Glance

Note: Reference codes (e.g., HYD-1, I. NOISE-2) refer to specific provisions within the currently approved Conditions of Approval for Major Use Permit PL-25-71.

Resource Area	Current Condition (Pasta Farms PL-25-71)	Required Performance Standard (Firewise Demand)	Strategic Justification
Evacuation	J.5(b): Deferral of road design to the fire district.	SLFPD-Vetted Evacuation Flow Analysis for simultaneous workforce/resident egress.	Under *Bonta v. Lake County*, the Board must prove routes can handle the combined "tiered load."
Acoustic Impacts: Topographic Amplification	NOISE-2: Standard noise ordinances (55 dBA day / 45 dBA night) that assume flat, open topography.	Site-specific acoustic study modeling topographic reflection, including mandatory low-frequency noise monitoring.	Basin functions as a natural acoustic amphitheater; standard dBA thresholds fail to account for intensified low-frequency mechanical hum at residential property lines.
Oak Woodlands: Unpermitted Conversion	D.2: Speculative 3:1 replacement plan using acorn-basin planting.	Disclosure of formal Timberland Conversion Permit status or registered RPF exemption prior to site disturbance.	Wholesale clear-cutting of fire-resilient mature oaks exacerbates surface fuel drying and regional wildfire risk.

III. Detailed Technical Specifications

1. Fire Safety & Meteorological Controls: Real-Time Operational Triggers

   The project shall maintain an on-site, automated meteorological station capable of real-time telemetry. Operations that generate ignition risks—specifically tarp-pulling, open-flame work, and motorized equipment transport—must trigger a mandatory work stoppage when relative humidity falls below 30% or when wind gusts exceed the strict Calfire standard of 10 mph. This site-specific data shall supersede general state-level "Red Flag" warnings, ensuring that operational safety protocols remain calibrated to the specific micro-climatic conditions of the Seigler Springs basin.

2. Oak Woodlands & Timberland Conversion: Mitigation & Disclosure

   The wholesale felling of mature, fire-resilient oaks across the project footprint constitutes unpermitted "timber operations" on "timberland" under 14 CCR § 895.1. The current environmental record's reliance on superficial "Other Lands" mapping is legally insufficient. The Board must compel the applicant to explicitly disclose the specific regulatory exemption being claimed or produce a valid Timberland Conversion Permit issued by CAL FIRE prior to any grading, tree removal, or permit activation. Furthermore, the current "symbolic" oak replacement mitigation plan is insufficient. The applicant must establish a commensurate mitigation plan that replaces functional canopy and immediate ecosystem services rather than relying on speculative acorn-basin planting or individual tree counts.

3. Acoustic Impacts: Topographic Amplification

   The standard noise thresholds (55 dBA day / 45 dBA night) are insufficient for the Seigler Springs basin, which functions as a natural acoustic amphitheater. The project must commission a site-specific acoustic study that models topographic reflection and intensification of low-frequency mechanical hum. This study must evaluate impacts at residential property lines, rather than relying on blanket dBA measurements, and include provisions for mandatory low-frequency noise monitoring to prevent the "mechanical drone" effect on residential pockets.

EXECUTIVE SUMMARY

Fire Marshal's Assessment of Wildfire Preparedness, Emergency Access, and Evacuation

Pasta Farms
Major Use Permit PL-25-71
Prepared by
Duncan Gamlen
Fire Marshal
Mountain of Attention Sanctuary

Principal Conclusion
Based upon my review of the project documents, field observations, applicable fire protection standards, and my professional experience in wildfire preparedness and emergency planning, I conclude that the current administrative record would benefit from additional evaluation of emergency access and evacuation before the Lake County Board of Supervisors makes findings regarding wildfire impacts.
While the project addresses many important fire protection measures—including defensible space, emergency water supply, and compliance with applicable fire regulations—It did not identify a project-specific analysis demonstrating how residents, employees, visitors, neighboring communities, and emergency responders would safely utilize the existing transportation network during a rapidly developing wildfire.

Key Findings
1. Wildfire is a foreseeable condition.
The project is located within a designated Very High Fire Hazard Severity Zone in an area that has experienced repeated significant wildfires, including the 1970 Seigler Fire, the 1979 Seigler Canyon Fire, and the 2015 Valley Fire.
2. Emergency access depends upon a limited rural road network.
The project and surrounding communities rely upon Seigler Springs North Road and connecting rural roadways that contain limited sight distance, unpaved sections, and operational characteristics that should be considered during wildfire evacuation.
3. Evacuation should be evaluated cumulatively.
Residents, neighboring developments, commercial operations, visitors, emergency responders, and mutual aid resources would all rely upon the same transportation network during a significant wildfire.
4. Protecting structures and protecting people are different public safety objectives.
Compliance with applicable fire regulations improves wildfire preparedness but does not, by itself, demonstrate that emergency evacuation has been adequately evaluated under realistic wildfire conditions.
5. Additional evacuation analysis would strengthen the environmental record.

A project-specific evaluation of emergency access, cumulative evacuation demand, responder ingress, and operational roadway performance would provide decision-makers with a more complete understanding of the project's public safety implications.

Professional Opinion

In my professional opinion, wildfire planning within California's Wildland-Urban Interface should extend beyond compliance with minimum fire-safe construction and roadway standards to include comprehensive evaluation of emergency access, responder operations, and public evacuation.

Accordingly, I recommend additional analysis of emergency evacuation before final approval of the proposed project.

Duncan Gamlen
Fire Marshal
Mountain of Attention Sanctuary
Lake County, California

Submitted to:

Lake County Board of Supervisors

July 9, 2026

Fire Marshal's Assessment of Wildfire Preparedness, Emergency Access, and Evacuation

1. PURPOSE OF THIS REPORT

This report presents my professional evaluation of the wildfire, fire protection, emergency access, and evacuation issues associated with the proposed Pasta Farms Major Use Permit (PL-25-71). It is intended to assist the Lake County Board of Supervisors in determining whether the current administrative record contains sufficient information to support the public safety findings required for project approval.

My review is limited to issues relating to wildfire risk, emergency access, fire suppression, and public evacuation. I have not evaluated the project's groundwater, biological resources, forestry, or legal access issues except where those matters directly affect emergency response or public safety. Those subjects are addressed separately by qualified experts retained by the community.

2. QUALIFICATIONS

I currently serve as Fire Marshal for Mountain of Attention Sanctuary, a 1,000-acre retreat and assembly occupancy located within the Seigler Springs area of southern Lake County. My responsibilities include fire prevention, emergency planning, wildfire preparedness, defensible space, fire suppression planning, emergency communications, and coordination with responding fire agencies.

My qualifications include:

- Fire Marshal, Mountain of Attention Sanctuary
- California Wildland Firefighter (Firefighter II)
- FEMA Incident Command System (ICS-100 and ICS-700)
- Emergency Medical Responder (EMR)
- FCC General Class Amateur Radio License
- Student in Fire Technology, Santa Rosa Junior College Public Safety Training Center
- Active participant in wildfire suppression within the Seigler Springs area since 1979
- Resident of the evacuation corridor serving the project area

In addition to my professional responsibilities, I have lived with the realities of wildfire in this community in the 70's, 80's and now in this decade. I have firsthand familiarity with the local road network, historical fire behavior, emergency response limitations, and evacuation challenges affecting the project area.

3. SCOPE OF REVIEW

In preparing this report I reviewed the following materials:

- Major Use Permit Staff Report
- Draft Initial Study and CEQA documentation
- Project Site Plans
- Property Management Plan
- Conditions of Approval
- Hydrology reports and supporting technical documents
- Drought Management Plan
- Oak Mitigation Plan
- Biological resource studies
- Applicable California Fire Code provisions
- California Public Resources Code Sections 4290 and 4291
- Historical wildfire information
- Personal field observations of project access roads and surrounding terrain

I also relied upon my personal familiarity with Seigler Springs North Road, Diener Road, surrounding residential neighborhoods, and the Mountain of Attention Sanctuary developed over more than five decades of visiting, residing, and participating in emergency response activities within this area.

4. PROJECT SETTING

The proposed Pasta Farms project is located within a designated **Very High Fire Hazard Severity Zone** in the wildland-urban interface (WUI) of southern Lake County. This designation reflects the convergence of dense vegetation, rugged topography, seasonal drought, and recurring wildfire conditions that substantially increase the likelihood of large, fast-moving wildfires.

The project is not proposed within an isolated agricultural valley served by redundant transportation routes. Instead, it lies within an existing rural community characterized by

scattered residences, recreational properties, agricultural uses, and nonprofit retreat facilities that all depend upon a limited network of narrow rural roads for access and evacuation.

Emergency access to the project and surrounding properties relies primarily upon Seigler Springs North Road and connecting rural roadways, including Diener Road. Portions of these roads are paved while others remain unpaved. The road system contains blind curves, narrow travel lanes, limited opportunities for opposing traffic to pass, and sections where dust generated by heavy traffic significantly reduces visibility during dry weather.

These same roads serve multiple functions simultaneously. They provide daily access for residents, visitors, agricultural operations, delivery vehicles, emergency responders, utility crews, and evacuation traffic during wildfire emergencies. Unlike urban transportation systems, there are few practical alternatives should any portion of the roadway become blocked by fire, disabled vehicles, fallen trees, or emergency operations.

California's experience during the past decade has fundamentally changed how emergency planners evaluate development within the Wildland-Urban Interface. Catastrophic fires—including the 2015 Valley Fire in Lake County and other major California wildfires—have demonstrated that rapid fire growth, limited evacuation routes, and increasing development within fire-prone landscapes can combine to overwhelm communities that previously believed themselves adequately protected. These lessons have influenced both emergency planning practices and judicial review of environmental documents addressing wildfire risk.

Accordingly, wildfire planning today extends beyond determining whether individual structures can survive a fire. It also requires evaluating whether residents, workers, visitors, and emergency responders can safely occupy, defend, and evacuate a community during rapidly changing wildfire conditions.

5. CHANGING UNDERSTANDING OF WILDFIRE RISK

California's approach to wildfire planning has changed dramatically during the past two decades. Historically, land use decisions in wildfire-prone areas focused primarily on whether structures could be defended through fire-resistant construction, defensible space, and adequate fire suppression resources. While those measures remain essential, recent catastrophic wildfires have demonstrated that protecting structures alone is not sufficient to protect human life.

Since 2015, California has experienced a series of unprecedented wildfires that have reshaped both emergency planning and environmental review. Fires such as the Valley Fire, Tubbs Fire, Camp Fire, Dixie Fire, Palisades Fire, and Eaton Fire collectively destroyed thousands of homes, displaced entire communities, and demonstrated that once a wildfire escapes initial attack under severe weather conditions, emergency evacuation often becomes the most critical life-safety objective.

These events also revealed several recurring themes:

- Most catastrophic wildfire fatalities occur during evacuation rather than while defending structures.
- Limited road networks can quickly become overwhelmed when residents, visitors, commercial traffic, and emergency responders attempt to use the same routes simultaneously.
- Human-caused ignitions remain responsible for the overwhelming majority of destructive California wildfires, increasing the importance of evaluating how new development may increase ignition opportunities within fire-prone landscapes.
- Development within the Wildland-Urban Interface (WUI) increases the complexity of emergency response by placing more people, vehicles, and infrastructure within areas where wildfire is both foreseeable and inevitable.

These lessons have influenced California's emergency planning practices as well as judicial interpretation of the California Environmental Quality Act (CEQA). In recent litigation involving Lake County, the courts concluded that wildfire risk and evacuation analyses must be based upon substantial evidence contained within the environmental record and cannot be addressed through generalized assumptions or post-hoc explanations.

As a result, contemporary wildfire planning requires more than demonstrating compliance with minimum fire-safe construction standards. It also requires careful evaluation of how a proposed project will affect emergency access, evacuation, responder safety, and the cumulative ability of surrounding communities to safely respond to a rapidly developing wildfire.

From a public safety perspective, this distinction is significant. Fire suppression resources can often be supplemented through mutual aid and statewide response

systems. Human evacuation, however, is constrained by geography. Roads cannot be widened during an emergency, additional evacuation routes cannot be created after a fire has started, and traffic congestion cannot be mitigated once residents are attempting to leave simultaneously. Consequently, emergency access and evacuation planning should be viewed as fundamental life-safety considerations during the environmental review process rather than as secondary operational concerns.

Professional Observation

Based upon my review of the project documents, I did not identify a project-specific analysis demonstrating how the proposed expansion of commercial activity within this Very High Fire Hazard Severity Zone would affect emergency evacuation under realistic wildfire conditions. In my professional opinion, evaluating wildfire solely through compliance with construction and fire code requirements does not fully address the broader public safety questions associated with evacuation, responder access, and cumulative wildfire risk.

6. LOCAL WILDFIRE HISTORY

The Seigler Springs area has a long and well-documented history of significant wildland fires. This history is important because it demonstrates that wildfire is not a speculative or remote possibility but a recurring environmental condition that has shaped both the landscape and the surrounding communities for decades.

Among the significant fires affecting the immediate area are:

- **The 1970 Seigler Fire**, which burned portions of the Seigler Springs area and demonstrated the susceptibility of the local vegetation and topography to rapid fire spread.
- **The 1979 Seigler Canyon Fire**, which again threatened properties within the project vicinity and reinforced the continuing wildfire hazard associated with the area's steep terrain, dense vegetation, and limited access routes.
- **The 2015 Valley Fire**, one of the most destructive wildfires in California history, which burned more than 76,000 acres in Lake, Napa, and Sonoma Counties and destroyed approximately 2,000 homes and other structures. The Valley Fire permanently altered how many Lake County residents, emergency responders, and public officials view wildfire risk and community evacuation.

These fires occurred under different weather conditions and during different decades, yet they share common characteristics that remain relevant today. Each demonstrated the potential for rapid fire growth under severe burning conditions, the importance of timely evacuation, and the limitations imposed by rural road networks serving dispersed communities.

The proposed Pasta Farms project is located within the same general fire environment that has experienced these repeated wildfire events. Consequently, wildfire should not be viewed as an extraordinary circumstance requiring unlikely assumptions. It is a foreseeable environmental condition that should be expected to recur during the operational life of this project.

California's recent wildfire experience further reinforces this conclusion. During the past decade, major fires throughout the state have repeatedly demonstrated that communities located within the Wildland-Urban Interface face increasing challenges associated with evacuation, responder access, and protection of life. While each fire has unique causes and circumstances, together they illustrate the importance of carefully evaluating whether additional development can be safely accommodated within areas that already present significant wildfire hazards.

The purpose of considering wildfire history is not to suggest that every future fire will resemble those of the past. Rather, historical fire occurrence provides important evidence that wildfire is an inherent characteristic of this landscape and that emergency planning should be based upon realistic expectations rather than optimistic assumptions.

Professional Observation

In my professional opinion, the documented history of significant wildfires affecting the Seigler Springs area establishes that wildfire must be treated as a foreseeable planning condition for this project. Because the project is located within a designated Very High Fire Hazard Severity Zone and within an area that has experienced repeated large wildfires, emergency access and evacuation should receive the same level of analytical rigor as other critical environmental resources evaluated under CEQA.

7. EMERGENCY ACCESS

Existing Road Network

The proposed Pasta Farms project is accessed primarily by Seigler Springs North Road, which connects with Seigler Canyon Road and serves as the principal means of ingress and egress for residents, agricultural operations, emergency responders, visitors, and businesses located within this portion of southern Lake County. The project vicinity is characterized by a rural road network that has evolved over many decades to serve a relatively low-density residential and agricultural population rather than modern commercial development.

Unlike urban transportation systems that provide multiple routes of travel and redundant access, the Seigler Springs area relies upon a limited number of interconnected roads. These roads must simultaneously accommodate routine daily traffic, emergency

response vehicles, maintenance equipment, delivery vehicles, and, during wildfire emergencies, civilian evacuation traffic.

As development within the Wildland-Urban Interface increases, so does reliance upon this existing transportation network. Consequently, the functional capacity of these roads during emergency conditions becomes an important public safety consideration.

Field Observations

As part of this evaluation, I conducted field observations of the primary access routes serving the proposed project.

Beginning at the intersection of Seigler Canyon Road, Seigler Springs North Road is paved for approximately two miles. Although generally serviceable for normal daily travel, several locations present operational considerations for emergency response.

Approximately ¼ mile from the intersection is a significant blind curve where approaching vehicles have limited sight distance. Based upon field observation, this section of roadway does not appear to provide sufficient width for simultaneous passage of a fire engine and an opposing passenger vehicle without one vehicle yielding. Under routine conditions this presents only a minor inconvenience. During an emergency evacuation involving smoke, reduced visibility, and increased traffic volumes, however, such locations may become operational choke points.

Approximately one hundred yards beyond this location the roadway makes a sharp ninety-degree turn with similarly restricted visibility. Again, the available roadway width appears limited for simultaneous passage of emergency apparatus and evacuating civilian traffic.

Beyond the paved section, Seigler Springs North Road transitions to an unpaved rural roadway extending toward the project area. This section is subject to loose aggregate, wash boarding, and seasonal dust generation typical of heavily traveled gravel roads.

Diener Road, which provides access within the vicinity of the proposed project, is likewise unpaved. During dry summer conditions, vehicle traffic generates significant dust that substantially reduces visibility. Under normal operating conditions this may require motorists to reduce speed and exercise caution. During a wildfire evacuation involving numerous civilian vehicles, emergency apparatus, utility vehicles, and law enforcement personnel, reduced visibility may significantly complicate both ingress and egress. It is duly noted that Pasta Farms has done an excellent job with reducing dust in the immediate vicinity of their existing grow operations on Seigler Springs North Road.

The combination of limited roadway width, restricted sight distance, unpaved surfaces, and dust generation represents conditions that should be evaluated within the broader context of emergency evacuation rather than considered solely as ordinary roadway characteristics.

Figures to be inserted in next draft of this document.

Emergency Response Considerations

Wildland fire response differs significantly from routine emergency response. During a rapidly developing wildfire, emergency vehicles are often traveling toward the incident while residents, employees, visitors, and commercial traffic are attempting to leave the affected area simultaneously.

Unlike routine traffic operations, emergency response frequently involves:

- Type 6, Type 3, and Type 1 fire engines
- Water tenders
- Bulldozers transported on trailers
- Strike team vehicles
- Law enforcement units
- Ambulances
- Utility repair vehicles
- Animal evacuation trailers
- Civilian vehicles operating under stressful conditions

These vehicles vary considerably in size, maneuverability, and operating speed. As traffic density increases, opportunities for opposing vehicles to safely pass one another diminish, particularly at locations with limited sight distance or restricted roadway width.

During wildfire incidents, delays of only a few minutes may significantly affect both suppression operations and civilian evacuation.

For this reason, emergency access should not be evaluated solely by whether vehicles can physically traverse a roadway under normal conditions. Rather, consideration should be given to whether the transportation network can continue functioning safely during simultaneous emergency ingress and civilian evacuation under adverse environmental conditions.

Applicable Fire Safety Standards

California Public Resources Code Sections 4290 and 4291 establish minimum statewide standards for emergency access, roadway construction, defensible space, and related fire safety measures within State Responsibility Areas and Very High Fire Hazard Severity Zones. These standards recognize the importance of providing

emergency responders with reasonable access to structures while reducing wildfire risk through roadway design and vegetation management.

These standards establish important minimum design criteria. However, compliance with minimum roadway standards should not be interpreted as demonstrating that wildfire-related impacts have necessarily been reduced to a less-than-significant level under CEQA.

Emergency evacuation involves substantially broader considerations than roadway geometry alone. Factors such as cumulative traffic demand, simultaneous evacuation, responder access, smoke conditions, visibility, human behavior, equipment staging, and roadway redundancy all influence whether a community can be evacuated safely during a rapidly developing wildfire.

Accordingly, roadway compliance and evacuation analysis should be viewed as complementary, but distinct, components of wildfire planning.

Professional Observation

Based upon my review of the project documents and my field observations, I did not identify an analysis evaluating how the existing road network would function during a simultaneous wildfire evacuation involving project employees, nearby residents, emergency responders, and surrounding communities. While the project includes fire protection measures and references applicable roadway standards, my review did not locate a project-specific evaluation of operational evacuation performance under realistic wildfire conditions.

In my professional opinion, the emergency access discussion should extend beyond infrastructure design standards to include how the transportation network is expected to function during the conditions under which it is most likely to be needed.

8. EMERGENCY EVACUATION ANALYSIS

Life Safety as the Primary Objective

The primary objective of every wildfire response is the protection of human life. While protecting structures, natural resources, and infrastructure remains important, modern wildfire doctrine recognizes that no structure is worth the loss of a human life. Consequently, when wildfire threatens populated areas, emergency planning must focus first on whether residents, workers, visitors, and emergency responders can move safely and efficiently through the affected area.

This principle has become increasingly important as development has expanded into California's Wildland-Urban Interface (WUI). Communities that once consisted primarily of dispersed rural residences now include commercial operations, assembly

occupancies, agricultural businesses, recreation, and tourism. These additional land uses increase the number of people who may require evacuation while simultaneously increasing the number of vehicles using the same limited transportation network.

From a public safety perspective, evacuation planning is no longer simply a transportation issue. It is a life-safety issue.

Existing Population at Risk

The proposed project is located within an area that already supports a diverse population with varying evacuation needs.

These include:

- Permanent residents.
- Seasonal residents.
- Agricultural workers.
- Visitors unfamiliar with the local road system.
- Guests attending Mountain of Attention Sanctuary.
- Residents of the Shenandoah subdivision.
- Individuals with mobility limitations.
- Owners of horses and other large animals requiring specialized evacuation.
- Emergency responders attempting to enter the area.

Each of these populations presents different evacuation challenges. Some may leave immediately upon receiving a warning. Others may delay evacuation while gathering family members, securing livestock, or attempting to protect property. Visitors unfamiliar with the area may require additional time to locate evacuation routes, particularly under conditions of smoke and reduced visibility.

These are predictable human behaviors that should be anticipated during emergency planning.

Effect of the Proposed Project

The Pasta Farms project would introduce additional employees, vendors, service providers, contractors, delivery vehicles, and operational traffic into an area already dependent upon a limited road network.

Under normal operating conditions this additional activity may have little effect upon daily traffic patterns. During a wildfire emergency, however, these additional vehicles become part of the evacuation demand placed upon the existing transportation system.

Unlike residential development, commercial operations may also include employees who are unfamiliar with local evacuation routes, temporary contractors, or commercial drivers whose first priority may be removing equipment or completing deliveries before evacuating. These circumstances can increase traffic complexity during the initial stages of an emergency.

The issue is not simply the number of additional vehicles. Rather, it is the interaction between existing community traffic, commercial operations, emergency response resources, and evacuation behavior occurring simultaneously on the same limited roadway system.

Cumulative Evacuation Demand

One of the fundamental principles of emergency planning is that evacuation demand should be evaluated cumulatively rather than in isolation.

During a significant wildfire affecting the Seigler Springs area, evacuation demand would likely include:

- Existing residents.
- Multiple commercial cannabis operations.
- Employees.
- Visitors.
- Agricultural operations.
- Recreational users.
- Mountain of Attention Sanctuary.
- The Shenandoah subdivision.
- Emergency responders.
- Mutual aid resources arriving from outside the area.
- Utility crews.
- Animal evacuation trailers.

These populations would not evacuate independently. They would all rely upon the same road network during approximately the same period of time.

From my review of the environmental documents, I did not identify an analysis evaluating this cumulative evacuation demand or modeling how the transportation network would function under these conditions.

Because emergency evacuation is inherently cumulative, evaluating only the traffic generated by an individual project may underestimate the actual demands placed upon the roadway system during a wildfire emergency.

Emergency Response During Evacuation

Wildfire response creates a unique operational conflict.

Residents are attempting to leave.

Fire engines are attempting to enter.

Law enforcement officers may establish traffic control points.

Ambulances may be transporting injured persons.

Water tenders, bulldozers, strike teams, utility crews, and command vehicles may all be arriving simultaneously.

These competing movements occur while smoke reduces visibility, radio traffic increases, and conditions continue changing.

Every additional vehicle introduced into this environment increases operational complexity.

Successful wildfire evacuation depends upon maintaining adequate traffic flow in both directions while preserving access for emergency responders.

For this reason, emergency access cannot be evaluated separately from evacuation. They are interdependent components of the same public safety system.

Special Considerations

Several characteristics of the project vicinity warrant additional consideration during emergency planning.

First, portions of the surrounding population include older adults and individuals who may require additional time or assistance during evacuation. Delayed evacuation has repeatedly been identified as a contributing factor in wildfire fatalities throughout California.

Second, the area contains horses, livestock, and companion animals requiring transportation. Animal evacuation frequently requires trucks and trailers that operate more slowly and occupy greater roadway width than passenger vehicles.

Third, Mountain of Attention Sanctuary periodically hosts gatherings that increase the number of occupants within the immediate area. While these events are managed under established emergency procedures, they nevertheless contribute to the cumulative evacuation considerations affecting the surrounding road network.

Finally, emergency responders themselves depend upon the same transportation infrastructure used by the public. Any condition that impedes civilian evacuation may likewise delay fire suppression, rescue operations, and emergency medical response.

Professional Standard of Care

In my professional opinion, a comprehensive wildfire evaluation for a project of this nature should include, at a minimum:

- A project-specific evacuation analysis.
- Evaluation of cumulative evacuation demand.
- Assessment of emergency responder access during simultaneous evacuation.
- Identification of potential roadway bottlenecks.
- Consideration of vulnerable populations.
- Coordination with local fire agencies and law enforcement.
- Operational planning for wildfire incidents occurring during peak project activity.
- Integration with community evacuation planning.

These evaluations provide decision-makers with a more complete understanding of how a proposed project may influence public safety under foreseeable wildfire conditions.

Professional Observation

Based upon my review of the project documents, I did not identify a project-specific evacuation analysis addressing how existing residents, project employees, visitors, emergency responders, and neighboring communities would safely utilize the available road network during a rapidly developing wildfire.

In my professional opinion, emergency evacuation represents one of the most significant public safety considerations associated with this project. While the environmental documents acknowledge wildfire as an existing hazard, I did not identify an analysis demonstrating that the cumulative effects of additional commercial activity on evacuation have been evaluated with the level of detail now expected for development within California's Wildland-Urban Interface.

9. REVIEW OF THE CEQA WILDFIRE ANALYSIS

The California Environmental Quality Act (CEQA) requires lead agencies to identify potentially significant environmental impacts, evaluate those impacts using substantial evidence, and determine whether feasible mitigation measures can reduce those impacts to a less-than-significant level.

As a Fire Marshal, I am not offering legal opinions regarding CEQA compliance. My review is limited to evaluating whether the wildfire and emergency planning information contained within the environmental documents provides sufficient information for decision-makers to understand the project's potential public safety implications.

The environmental documents acknowledge that the project is located within a **Very High Fire Hazard Severity Zone** and identify wildfire as an existing environmental hazard. They also describe proposed fire protection measures, defensible space, emergency water supply, and compliance with applicable fire regulations.

These measures are important and represent appropriate components of wildfire preparedness. However, in my professional opinion they primarily address **how the project itself may be protected from wildfire** rather than **how wildfire may affect the people who occupy, work at, or travel through the project area during an emergency.**

From my review of the administrative record, I did not identify a comprehensive discussion of several issues that I believe are directly relevant to public safety.

These include:

- A project-specific evacuation analysis evaluating how occupants would safely leave the area during a rapidly developing wildfire.
- An evaluation of cumulative evacuation demand resulting from multiple existing and proposed developments relying upon the same transportation network.
- An operational assessment describing how emergency responders would maintain ingress while civilian traffic is simultaneously evacuating.
- An analysis of roadway performance under emergency conditions including smoke, reduced visibility, equipment staging, disabled vehicles, and increased traffic volumes.
- Consideration of vulnerable populations, including visitors unfamiliar with the area, older adults, individuals requiring additional evacuation assistance, and persons transporting livestock or horses.
- Evaluation of how simultaneous emergencies occurring elsewhere within Lake County could affect the availability of mutual aid fire resources.

These observations should not be interpreted as suggesting that the project cannot ultimately be approved or that appropriate mitigation measures cannot be developed. Rather, they reflect my opinion that these public safety considerations are not fully evaluated within the current record.

One of the most significant lessons learned from California's recent wildfire experience is that successful evacuation depends upon understanding how an entire community

functions during an emergency—not simply whether individual project elements satisfy applicable construction or fire code requirements.

Accordingly, emergency evacuation should be evaluated as a system involving transportation, human behavior, emergency response, communications, environmental conditions, and cumulative development rather than as a series of independent project features.

The California courts have similarly recognized that wildfire analysis must be supported by substantial evidence contained within the environmental record and that meaningful evaluation of evacuation cannot be deferred or addressed through generalized assumptions. The importance of project-specific wildfire analysis has become increasingly recognized following recent litigation involving large-scale development proposals within Lake County.

Professional Observation

Based upon my review of the project documents, I found substantial discussion regarding fire protection infrastructure and regulatory compliance. However, I did not identify an equivalent level of analysis addressing operational evacuation, responder access, or cumulative emergency traffic under realistic wildfire conditions.

From a public safety perspective, protecting structures and protecting people are related but distinct objectives. While the environmental documents address many important fire protection measures, I believe additional analysis of emergency evacuation would provide the Board with a more complete understanding of the project's public safety implications before making its decision.

10. REVIEW OF APPLICABLE FIRE STANDARDS

California has adopted comprehensive fire safety regulations intended to reduce wildfire risk and improve emergency response capabilities within State Responsibility Areas (SRA) and Very High Fire Hazard Severity Zones. Among the most important are the minimum fire safe regulations contained in California Public Resources Code Sections 4290 and 4291, together with implementing regulations adopted by the California Board of Forestry and Fire Protection.

These standards establish minimum requirements for emergency access, roadway design, addressing, water supply, and vegetation management. Their purpose is to improve firefighter access, reduce structural ignition potential, and enhance the safety of both emergency responders and the public during wildfire incidents.

The standards address subjects including:

- Emergency vehicle access road width
- Road surface and load-bearing capacity
- Maximum roadway grades
- Curve geometry and turning radii
- Turnouts and turnarounds
- Road and address signage
- Defensible space
- Vegetation management

These requirements represent important statewide minimum standards that have significantly improved wildfire preparedness throughout California.

However, compliance with these standards should not be interpreted as demonstrating that wildfire impacts have necessarily been reduced to a less-than-significant level for purposes of environmental review.

Roadway design standards address whether emergency vehicles can reasonably access a site under expected operating conditions. Emergency evacuation analysis addresses a different question: whether the transportation network can safely accommodate simultaneous civilian evacuation and emergency response during a rapidly evolving wildfire.

Although these subjects are related, they evaluate different aspects of public safety.

For example, a roadway may satisfy minimum geometric design standards while still experiencing significant operational challenges during an emergency involving smoke,

limited visibility, disabled vehicles, emergency apparatus, animal trailers, and large numbers of evacuating civilians.

Similarly, defensible space requirements substantially improve a structure's ability to survive wildfire but do not address how occupants will safely evacuate if fire conditions make continued occupancy untenable.

For these reasons, compliance with applicable fire codes should be viewed as one important component of wildfire preparedness rather than as a substitute for evaluating broader public safety considerations associated with emergency evacuation.

Professional Observation

Based upon my review, the project documents demonstrate considerable attention to applicable fire protection standards and regulatory compliance. These measures are appropriate and should remain an important component of project design.

However, from a public safety perspective, compliance with minimum fire-safe construction and roadway standards does not eliminate the need to evaluate how the surrounding transportation system will function during an actual wildfire emergency. In my opinion, both analyses are necessary to provide the Board with a complete understanding of wildfire-related public safety impacts.

11. PROFESSIONAL FINDINGS

Based upon my review of the project documents, applicable fire protection standards, personal field observations, and my professional experience in wildfire preparedness and emergency planning, I make the following findings:

Finding 1

The proposed Pasta Farms project is located within a **Very High Fire Hazard Severity Zone**, where wildfire represents a foreseeable and recurring environmental condition rather than a remote possibility.

Finding 2

The project area has experienced multiple significant wildfires during the past several decades, including the 1970 Seigler Fire, the 1979 Seigler Canyon Fire, and the 2015 Valley Fire. These events demonstrate the continuing wildfire hazard associated with this portion of Lake County.

Finding 3

Emergency access to the project and surrounding communities depends upon a limited rural road network that serves residents, visitors, agricultural operations, nonprofit organizations, emergency responders, and commercial traffic.

Finding 4

Field observations identified roadway characteristics including limited sight distance, narrow travel lanes, unpaved roadway sections, and seasonal dust conditions that warrant consideration when evaluating emergency evacuation under wildfire conditions.

Finding 5

The proposed project will introduce additional employees, commercial traffic, deliveries, contractors, and operational activity into an area already dependent upon this limited transportation network.

Finding 6

Emergency evacuation within the project vicinity should be evaluated cumulatively because existing residents, neighboring developments, commercial operations, visitors, emergency responders, and mutual aid resources would rely upon the same roadway system during a significant wildfire.

Finding 7

My review of the environmental documents did not identify a project-specific evacuation analysis evaluating cumulative evacuation demand, operational traffic performance, responder access during simultaneous evacuation, or roadway performance under realistic wildfire conditions.

Finding 8

The project documents appropriately address many important fire protection measures, including regulatory compliance, defensible space, emergency water supply, and applicable fire standards. These measures contribute to wildfire preparedness but do not, by themselves, evaluate the broader operational challenges associated with emergency evacuation.

Finding 9

Recent California wildfire experience has demonstrated that protection of human life depends not only upon fire-resistant construction and suppression resources, but also upon timely evacuation supported by adequate transportation infrastructure and coordinated emergency planning.

Finding 10

In my professional opinion, additional analysis of emergency evacuation would provide the Board of Supervisors with a more complete understanding of the project's public safety implications before making findings regarding wildfire impacts.

12. CONCLUSIONS

The Pasta Farms project is proposed within a landscape where wildfire is not an occasional or hypothetical event, but an inherent characteristic of the natural environment. The combination of steep terrain, seasonal drought, heavy vegetation, limited transportation infrastructure, and a documented history of significant wildfires creates conditions that require careful consideration whenever additional development is proposed.

My review of the project documents indicates that substantial attention has been given to many important aspects of wildfire preparedness, including compliance with applicable fire regulations, defensible space requirements, emergency water supply, and other fire protection measures. These components are important and should remain integral elements of the project should it ultimately proceed.

At the same time, my review did not identify an equivalent level of analysis addressing the operational realities of emergency evacuation. Modern wildfire planning recognizes that protecting structures and protecting human life are related but distinct objectives. While fire-resistant construction and compliance with applicable fire codes improve a structure's ability to survive wildfire, they do not necessarily demonstrate that residents, employees, visitors, and emergency responders can safely occupy or evacuate an area during a rapidly developing wildfire.

The environmental record reviewed for this project acknowledges wildfire as an existing environmental hazard but, in my professional opinion, does not fully evaluate how the existing transportation network would function under conditions involving simultaneous civilian evacuation and emergency response. Nor did I identify a project-specific assessment of cumulative evacuation demand resulting from existing development, neighboring communities, commercial operations, and emergency resources all relying upon the same roadway system.

California's recent wildfire experience has demonstrated that successful evacuation depends upon planning that extends beyond individual project boundaries. It requires

understanding how an entire community functions during emergency conditions when visibility is reduced, traffic increases dramatically, emergency responders are entering while civilians are leaving, and decisions must be made within minutes rather than hours.

As Fire Marshal for Mountain of Attention Sanctuary, and based upon my review of the project documents, applicable fire protection standards, field observations, and familiarity with the project area, I conclude that additional evaluation of emergency access and evacuation would provide the Lake County Board of Supervisors with a more complete understanding of the project's public safety implications before making findings regarding wildfire impacts.

This conclusion should not be interpreted as an opinion that the project cannot ultimately be developed safely. Rather, it reflects my professional opinion that the current administrative record would benefit from additional analysis addressing the operational realities of wildfire evacuation within this portion of the Wildland-Urban Interface.

13. RECOMMENDATIONS

Based upon my review, I respectfully recommend that the following public safety considerations be addressed before final action is taken on the proposed project:

Recommendation 1

Prepare a project-specific emergency evacuation analysis evaluating the movement of project employees, residents, visitors, emergency responders, and neighboring communities during a rapidly developing wildfire.

Recommendation 2

Evaluate cumulative evacuation demand associated with existing residences, neighboring developments, commercial operations, recreational users, and emergency response resources utilizing the same transportation network.

Recommendation 3

Assess emergency vehicle ingress and civilian egress under simultaneous wildfire conditions, including potential roadway bottlenecks, restricted visibility, and operational conflicts.

Recommendation 4

Coordinate project emergency planning with the South Lake County Fire Protection District, CAL FIRE, law enforcement agencies, and other emergency response organizations having jurisdiction within the project area.

Recommendation 5

Develop a written Wildfire Emergency Operations Plan for the project addressing employee notification, evacuation procedures, visitor accountability, emergency communications, and coordination with responding agencies.

Recommendation 6

Provide annual wildfire preparedness training for project personnel, including evacuation procedures, fire weather awareness, emergency communications, and initial fire reporting responsibilities.

Recommendation 7

Continue evaluating roadway improvements and operational measures that may improve emergency access and reduce evacuation conflicts where feasible.

Recommendation 8

Incorporate emergency evacuation planning into the overall environmental review process as an integral public safety consideration rather than relying solely upon compliance with minimum roadway design standards or fire code requirements.

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
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June 17, 2026

Mary Claybon, MSML
Senior Planner
Community Development Department
255 N. Forbes Street
Lakeport, CA 95453

Dear Ms. Claybon,

This letter is regarding the request for agency review for a commercial cannabis expansion project near Kelseyville, CA (PL-25-71) located at 10750 Siegler Springs Road. I have reviewed the documents you sent me via email on June 16, 2026. In reviewing Appendix C (Plant and Wildlife Species observed in the study area) and Appendix D (Biological Resources Assessment), it has been documented that conifer and hardwood species exist within the project area, specifically: incense cedar, knobcone pine, ponderosa pine, Douglas-fir, and black oak.

There are four conditions that require a permit from CAL FIRE resource management. On private timberland when a landowner sells, barters, trades, or converts timberland to a non-timberland use, a permit from CAL FIRE is required. As such, the land must be considered "timberland" pursuant to the Public Resources Code (PRC). PRC 4526 states: "timberland means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."

"Commercial Species" pursuant to 14CCR 895.1 "means those species found in group A and those in group B that are found on lands where the species in group A are now growing naturally of have grown naturally in the recorded past."

For the district of Lake County where the project is proposed, commercial species exist within the project area. These species are identified below:

Group A:
Ponderosa pine, Douglas-fir, incense cedar
Group B:
Knobcone pine, California Black Oak

Therefore, timberland may be present in the project area. According to Appendix D, montane hardwood-conifer forest is present within 9.72 acres of the project area (those areas identified as Area H, portions of A, C, E, F, G, and within buffers surrounding all other areas). If timberland is within the project area and is proposed for conversion

(timberland converted to a non-timberland use), then a timber harvesting plan is required to be accepted or approved prior to the start of timber operations. Please feel free to contact me with any questions.

Sincerely,

Kimberley Sone

Kimberley Sone
Division Chief, Resource Management
CAL FIRE Sonoma-Lake-Napa Unit