

Douglas and Janice Ebert
21500 Eureka Rd.
Middletown, CA 95461

Eric Porter
Lake County Community Development
255 N. Forbes Street
Lakeport, CA 95453

RE: Three Bees LLC

Mr. Porter;

In February of this year I received a letter from the Lake County Community Development Department informing me of the application for (16) A-Type 3 commercial cannabis licenses and (1) A-Type 13 'Self Distribution' license to be worked on 335 +/- acres on five parcels. Two of these parcels adjoin my property lines.

It is my understanding that the local public review period is open until March 15 and I have some comments/concerns in regards to the Project Environmental Checklist Form Initial Study (IS 19-51). I will address these by impact categories and subsections as we move through the study.

I. AESTHETICS: Would the project:

a) Have a substantial adverse effect on a scenic vista? You state that the site is located on Eureka Road, a paved County road and that the cultivation areas are not visible from the road. I have lived on Eureka Rd. for 9 ½ years and my neighbor has been here for 30 years and Eureka Rd. has **NOT** been paved at any time during that period.

c) Substantially degrade the existing visual character or quality of public views the site and its surroundings? You state "the site is situated in a manner that makes it difficult or impossible to be seen from Eureka Road. There is dense underbrush between the road and the cultivation areas, and the terrain further conceals the cultivation areas from the highway." I fail to see how anyone who has made a physical trip to this site could honestly say that it is difficult or impossible for the cultivation site to be seen from anywhere on Eureka Road. First of all, as you have stated in item (a) above, the site is on Eureka Road; second, there is no dense underbrush between the road and the cultivation areas that would conceal the site from the highway. If you made a physical trip to the area, you would see that the site can be seen from most anywhere on the highway and Eureka Road.

III. AIR QUALITY: Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan? You state that odors generated by the plants, particularly during harvest season, will need to be mitigated either through passive means or active means. Last year's 20 acre grow caused me to have problems with my allergies and asthma, I can only imagine what a 335 acre grow will do to my health.
- b) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation? Your explanation on this is that generators are only allowed during a power outage and that minimal construction would be required to build the 640 s.f. drying building. Last year they had a generator running 24 hours a day 7 days a week to run the well and they have (3) 30' x 100' metal buildings they used for drying. This is in direct conflict of what you have stated.
- c) Expose sensitive receptors to substantial pollutant concentrations? You state that the nearest residence appears to be located approximately 1600 feet from the western-most cultivation site. That residence would be my residence and is less than 1600 feet from the cultivation site.
- d) Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people? You state that the cultivation area on the site was previously disturbed by prior crop cultivation (non cannabis) and that the applicant will be required to submit an Odor Control Plan. Last year site 014-140-19 was used for a 20 cannabis grow, unless you are talking about another site. Also, how do you mitigate odors of an outdoor cultivation area?

IV. BIOLOGICAL RESOURCES: Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CA Department of Fish and Game or U.S. Fish and Wildlife Service? You state the applicant provided an assessment that was dated September 2019 that concluded there were no threatened or endangered species of flora and fauna observed in or near the cultivation areas. At other times of the year I have observed many species such as River Otter, Blue Herron, Bald Eagles, Bats, Kildare, Yellow-bellied finch, Canadian Geese, Owls, Coyotes, Mountain Lions, Bobcats, and Ducks. In addition, there are many vernal pools on record in Lake County. Has there been an official study or research for recorded vernal pools in the area?

IX. HAZARD AND HAZARDOUS MATERIALS: Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? It is stated that the cultivation site is

not located within a flood zone so there is little risk of inundation-related chemical migration. Site 014-140-21 tends to have areas that flood during heavy rains. These periods of flooding could cause the possibility of chemical migration onto neighboring parcels.

X. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? You state the applicant has indicated that the cultivator intends on drilling a well and would need 1.1 million gallons of water per month. The applicant has not yet provided a Water Availability Analysis.

c) Substantially alter the existing drainage pattern of the silt or area, ... You state the applicant has stated that the total cultivation area is about 16 acres in size. My concerns are that if the total cultivation aree is 16 acres, why are they applying for permits for 335 acres; i.) result in substantial erosion or siltation on or off site: siltation to my pond in flood; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site: shift in flood plane; iv) impede or redirect flood flows: shift flood zone.

e) Conflict with or obstruct implantation of a water quality control plan or sustainable groundwater management plan. The amount of water this project proposes to use poses a substantial impact to the water table and the shifting of the toxic plume being monitored at the old Geothermal Landfill south of this area. This would be an additional impact on top of the Lotus Investment project at Guenoc and the additional well site near Butts Canyon Road and Highway 29.

XIII. NOISE: Would the project result in:

b) Generation of excessive groundborne vibration or groundborne noise levels? The explanation states that the low level truck traffic during construction and for deliveries would create a minimal amount of groundborne vibration. Last year the prior grow of 20 acres brought in 800 ton of rock delivered which created groundborne vibrations and damage to the culverts and pipes.

XVIL. TANSPORTATION: Would the project:

a) conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths? Your response states that the proposed project site is accessed from Eureka Road, a paved County-maintained road. A minimal increase in traffic is anticipated, daily employee trips are anticipated to be between 20 and 40 average during peak harvest times. As I stated in category 1a, Eureka

Road is NOT a paved road and even though the county may be responsible for the maintenance of Eureka Road, they have not done anything to maintain the road in the 9 ½ years that I have lived here and according to my neighbor, during the 30 years she has lived here. As far as traffic, there are 4 residents that live on Eureka Road which accounts for 4 – 8 trips per day on average. Last year, during harvest time, there were, 20 – 40 employee trips per day on average – and that was for a 20 acre grow site. This is a 300% - 400% increase in traffic. In addition, please remember, Eureka Road is a one lane road with no room for two cars to pass one another, let alone one or two trucks.

With these discrepancies in mind, I am concerned that it is possible that GPS mapping may have been used in place of physical observations and surveying when determining the explanations needed for any necessary mitigations.

Furthermore, with the health issues brought on by the high pollens and harvest seasons, I would not want to be forced into selling my house. Nor, would I want to find myself trapped on my property during a heavy rain due to a collapsed culvert and flooded road. Since the applicant has to maintain the access road to the cultivation site, why not have them put in a new access road from Butts Canyon Road, Parcel 014-003-24 has a property line on Butts Canyon Road and all the heavy traffic could access the site from there.

Thank you for your time and consideration when looking at final approval of these permits and mitigations of each.

Thank you

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