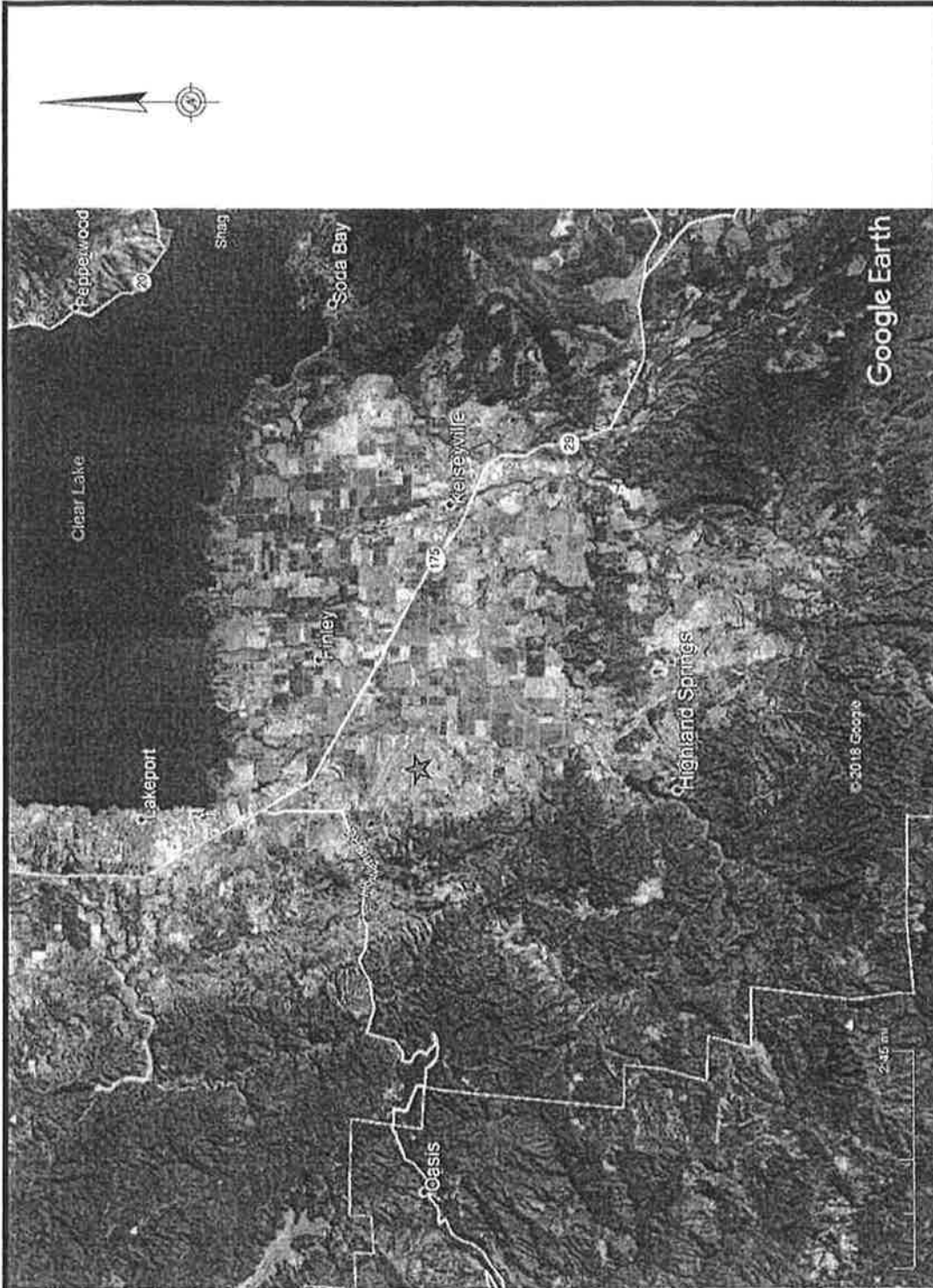


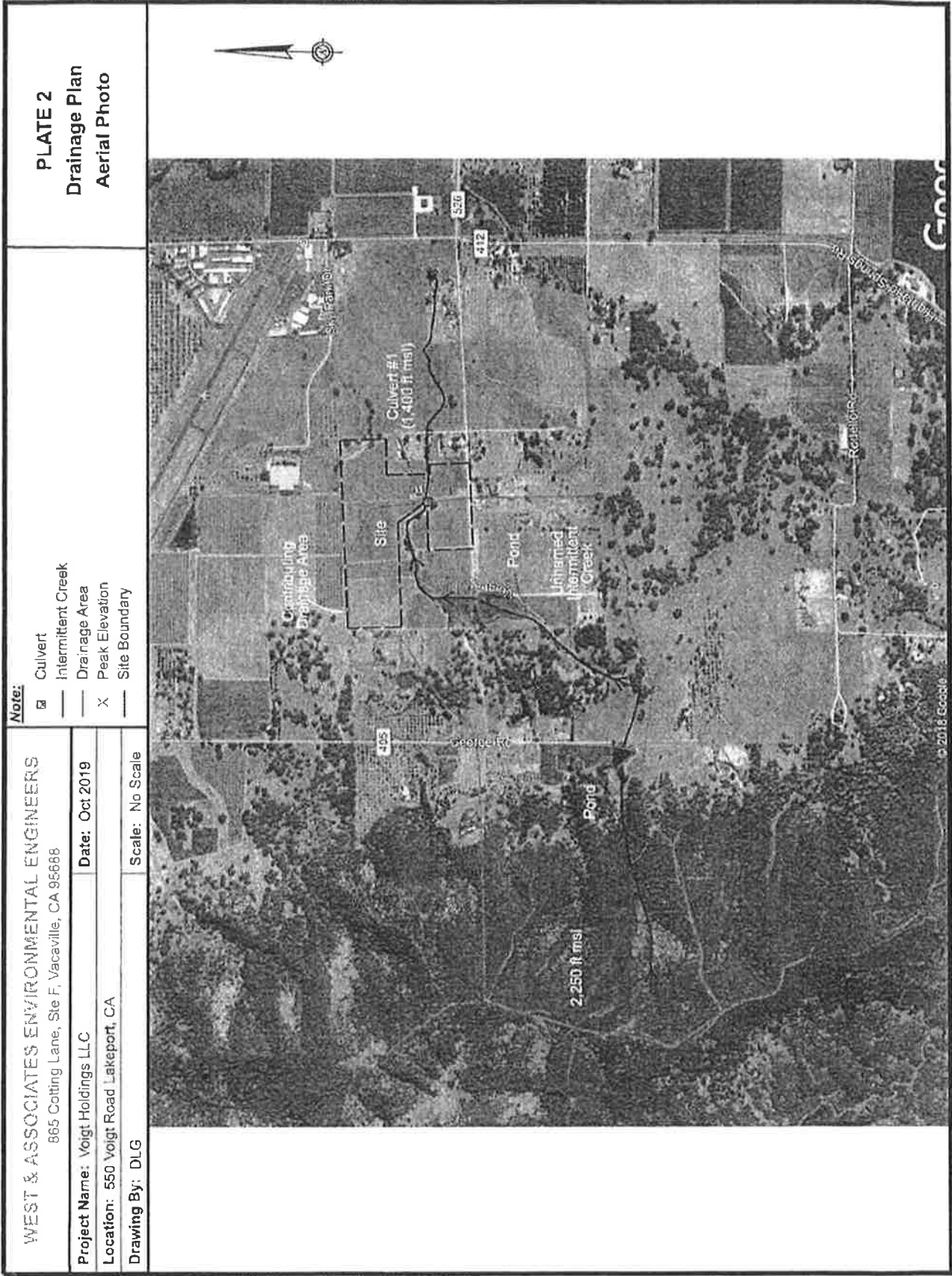
A.6 IRRIGATION & CULTIVATION MANAGEMENT

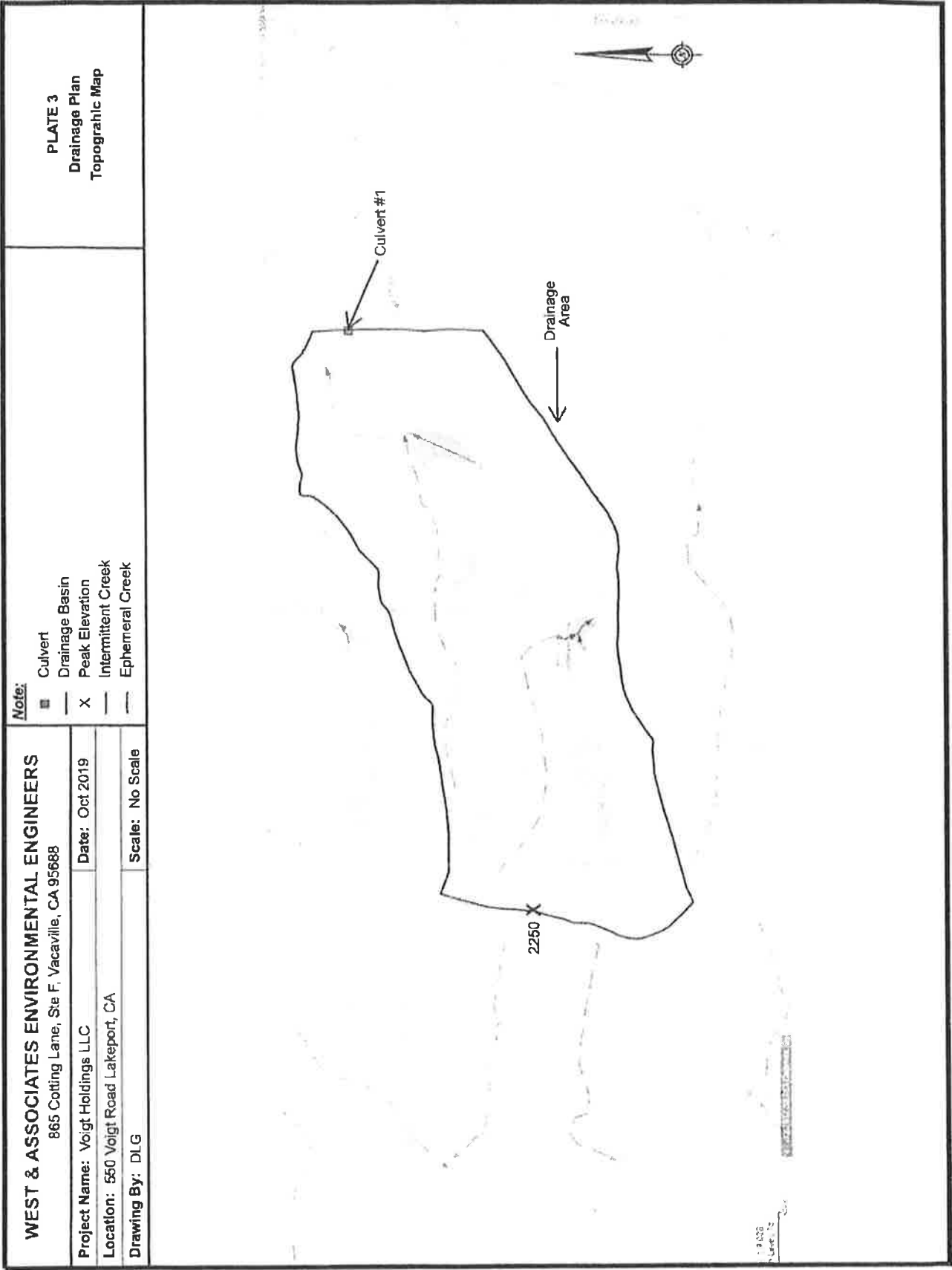
- Cultivation-related waste shall be stored in a place where it will not enter a stream.
- Soil bags and other garbage shall be collected, contained, and disposed of at an appropriate facility, including for recycling where available.
- Pots shall be collected and stored where they will not enter a waterway or create a nuisance.
- Plant waste and other compostable materials be stored (or composted, as applicable) at locations where they will not enter or be blown into surface waters, and in a manner that ensures that residues and pollutants within those materials do not migrate or leach into surface water or groundwaters.
- Imported soil for cultivation purposes shall be minimized. In the event that containers (e.g. grow bags or grow pots) are used for cultivation, reuse of soil shall be maximized to the extent feasible.
- Spent growth medium (i.e. soil and other organic medium) shall be handled to minimize discharge of soil and residual nutrients and chemicals to watercourses. Proper handling of spent soil could include incorporating into garden beds, spreading on a stable surface and revegetation, storage in watertight dumpsters, covering with tarps or plastic sheeting prior to proper disposal.
- Trash containers of sufficient size and number shall be provided and properly serviced to contain the solid waste generated by the project.
- Provide roofs, awnings, or attached lids on all trash containers to minimize direct precipitation and prevent rainfall from entering containers.
- Use lined bins or dumpsters to reduce leaking of liquid waste. Design trash container areas so that drainage from adjoining roofs and pavement is diverted around the area(s) to avoid run-on.
- Make sure trash container areas are screened or walled to prevent off-site transport of trash. Consider using refuse containers that are bear-proof and/or secure from wildlife.
- Refuse shall be removed from the site on a frequency that does not result in nuisance conditions, transported in a manner that they remain contained during transport, and the contents shall be disposed of properly at a proper disposal facility.
- Ensure that human waste disposal systems do not pose a threat to surface or ground water quality or create a nuisance. Onsite treatment systems should follow applicable County ordinances for human waste disposal requirements, consistent with the applicable tier under the State Water Resources Control Board Onsite Waste Treatment System Policy.
- Install buffer strips, bioswales, or vegetation downslope of cultivation areas to filter runoff of chemicals from irrigation.
- Irrigate at rates to avoid or minimize runoff.
- Regularly inspect and repair leaks in mains and laterals, in irrigation connections, or at the ends of drip tape and feeder lines.
- Design irrigation system to include redundancy (i.e., safety valves) in the event that leaks occur, so that waste of water is prevented and minimized.
- Recapture and reuse irrigation runoff (tailwater) where possible, through passive (gravity-fed) or active (pumped) means.

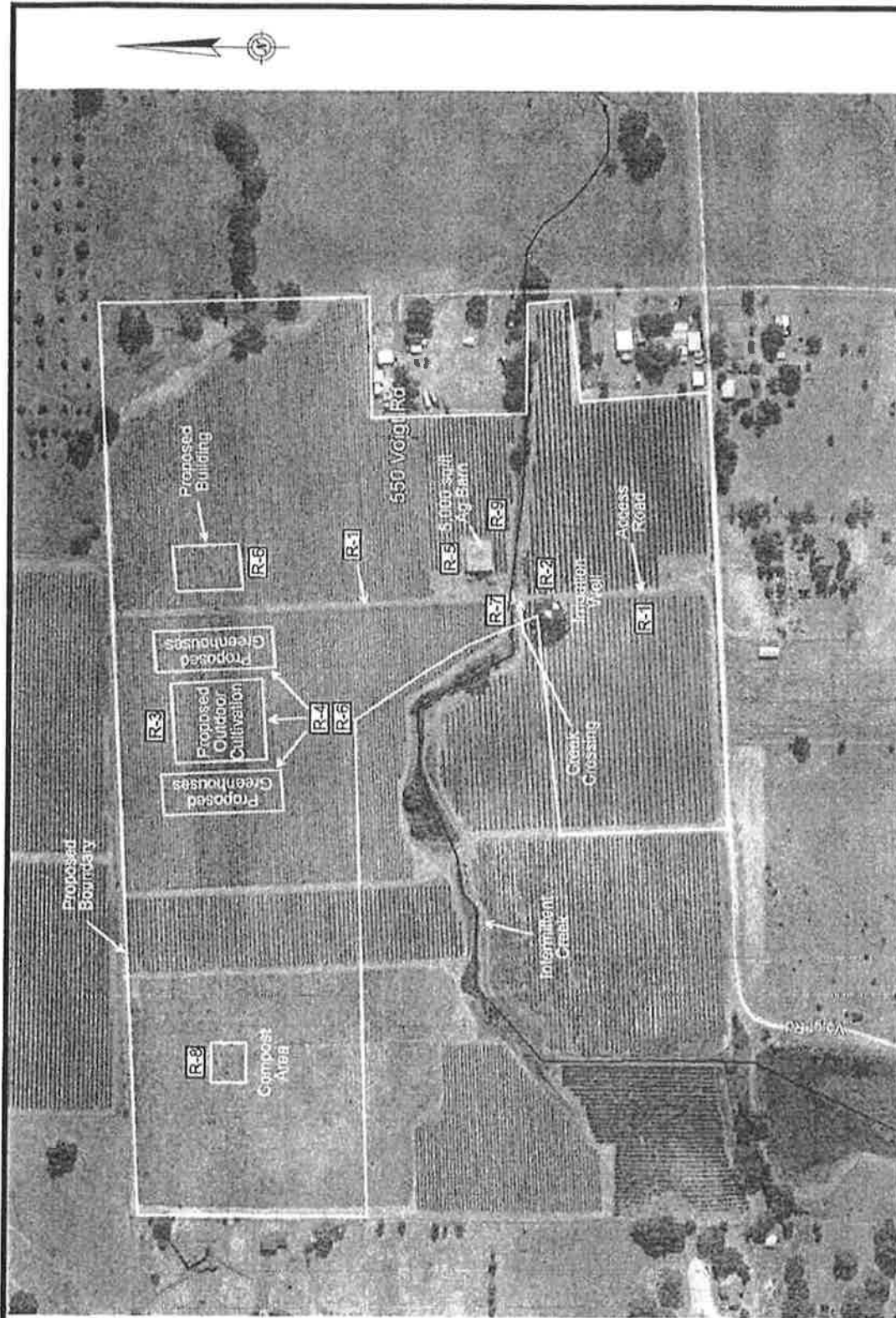
- Construct retention basins for tailwater infiltration; percolation medium may be used to reduce pollutant concentration in infiltrated water. Constructed treatment wetlands may also be effective at reducing nutrient loads in water.
- Ensure that drainage and/or infiltration areas are located away from unstable or potentially unstable features.
- Regularly replace worn, outdated or inefficient irrigation system components and equipment.
- Leave a vegetative barrier along the property boundary and interior watercourses to act as a pollutant filter.
- Employ rain-triggered shutoff devices to prevent irrigation after precipitation.
- Evaluate irrigation water, soils, growth media, and plant tissue to optimize plant growth and avoid over-fertilization.
- All chemicals shall be stored in a manner, method, and location that ensures that there is no threat of discharge to waters of the State.
- Products shall be labeled properly and applied according to the label.
- Use integrated pest management strategies that apply pesticides only to the area of need, only when there is an economic benefit to the grower, and at times when runoff losses are least likely.
- Periodically calibrate pesticide application equipment.
- Use anti-backflow devices on water supply hoses, and other mixing/loading practices designed to reduce the risk of runoff and spills.
- Petroleum products shall be stored with a secondary containment system such as a pan or a tub
- Throughout the rainy season, any temporary containment facility shall have a permanent cover and side-wind protection, or be covered during non-working days and prior to and during rain events.
- Materials shall be stored in their original containers and the original product labels shall be maintained in place in a legible condition. Damaged or otherwise illegible labels shall be replaced immediately.
- Bagged and boxed materials shall be stored on pallets and shall not be allowed to accumulate on the ground. To provide protection from wind and rain throughout the rainy season, bagged and boxed materials shall be covered during non-working days and prior to rain events.
- Have proper chemical and fertilizer storage instructions posted at all times in an open and conspicuous location.
- Prepare and keep a spill prevention and cleanup plan onsite when dealing with any hazardous materials.
- Keep ample supply of appropriate spill clean-up material near storage areas.
- Plant cover crops to boost soil fertility, improve soil texture, and protect from storm caused sediment runoff.



WEST & ASSOCIATES ENVIRONMENTAL ENGINEERS 865 Cotling Lane, Ste F, Vacaville, CA 95688		Legend ★ Site Location	PLATE 1 Regional Site Location
Project Name: Voigt Holdings LLC	Date: Oct 2019		
Location: 550 Voigt Road, Lakeport, CA			
Drawing By: DLG	Scale: See Above		

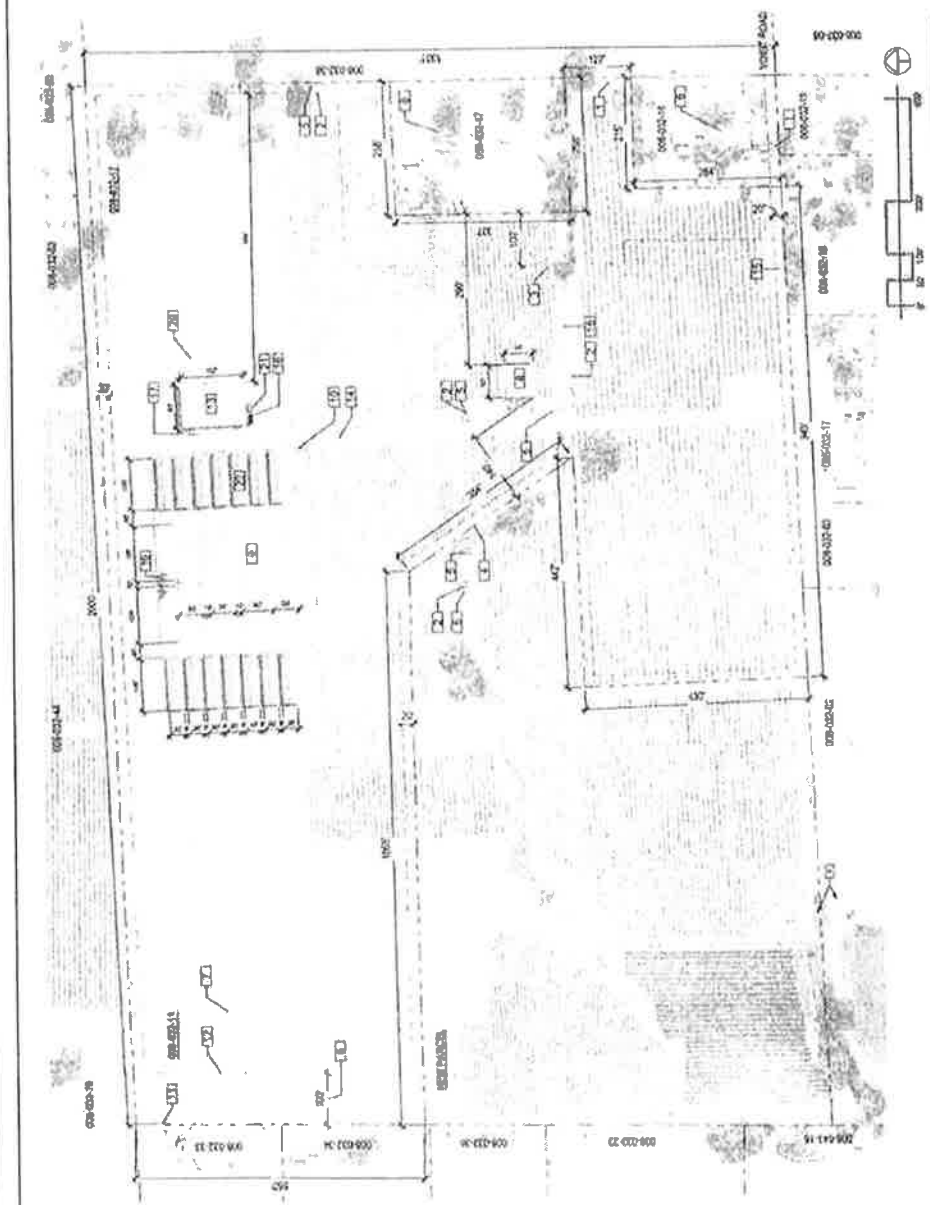






WEST & ASSOCIATES ENVIRONMENTAL ENGINEERS 955 Colling Lane, Ste F, Vacaville, CA 95588		PLATE 4 Site Management Plan Inspection Map	
Project Name: Voigt Holdings LLC Location: 550 Voigt Road, Lakeport, CA Drawing By: DLG	Date: Oct 2019 Scale: See Above	Legend [R-1] Inspection Areas [R-2] Irrigation Well	

APPENDIX B
ENGINEERED SITE PLAN



PROPOSED SITE PLAN

<p>VOIST HOLDINGS, LLC</p> <p>100 VOIST ROAD LAUREL, CA 94548</p>		<p>PROPOSED SITE PLAN</p>
<p>NOTES</p> <p>1. SEE EXISTING SITE PLAN FOR DETAILS.</p> <p>2. ALL DIMENSIONS ARE IN FEET.</p> <p>3. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>4. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>5. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>6. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>7. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>8. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>9. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>10. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>11. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>12. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>13. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>14. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>15. ALL DISTANCES ARE MEASURED FROM THE CORNER OF THE LOT.</p> <p>16. 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**COUNTY OF LAKE
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION**

Courthouse - 255 N. Forbes Street
Lakeport, California 95453
Phone (707) 263-2221 FAX (707) 263-2225

NOV 04 2019

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT
Planning Division Application
Commercial Cannabis Cultivation Major and Minor Use Permit
(Please type or print)

Project name: Voigt Holdings LLC Cannabis Cultivation
Assessors Parcel #: 008 - 032 - 170

008 - 032 - 110

INITIAL FEES:

UP 19-41	\$2,721.00
IS 19-60	\$1,425.00
EA 19-66	\$190.00
Arch Rev	\$75.00
Daycare Proximity	\$20.00
Cannabis Service Fee	\$4,160.00
Subtotal:	\$8,591.00
Technology Recovery (2%)	\$86.72
General Plan Maintenance	\$50.00
Total:	\$8,727.72

Zoning: A-WW-AA

General Plan: A

Receipt # 52178

Initial: VF

APPLICANT:

NAME: Voigt Holdings LLC
MAILING ADDRESS: 5355-A Skyline Blvd
CITY: Santa Rosa
STATE: California ZIP: 95409
PRIMARY PHONE: (707) 529-2378
SECONDARY PHONE: (510) 765-0669
EMAIL: _____

PROPERTY OWNER (IF NOT APPLICANT):

NAME: _____
MAILING ADDRESS: _____
CITY: _____
STATE: _____ ZIP: _____
PRIMARY PHONE: () _____
SECONDARY PHONE: () _____
EMAIL: _____

PROJECT LOCATION

ADDRESS: 550 Voigt Road, Lakeport

PRESENT USE OF LAND:
Vineyard / Agriculture

DESCRIPTION OF PROJECT:

Cannabis Cultivation - 2 one
acre cultivation sites on 40.5 acres
total. (2 @ 22,000 sq ft mixed
lighting and 2 @ 21560 sq ft outdoor

SURROUNDING LAND USES:

North: General Plan A Agriculture
South: General Plan A Agriculture
East: General Plan A & General Plan I Ag + PDC
West: General Plan A Agriculture

PARCEL SIZE(S):

Existing: 16.1 42.0
Proposed: 40.5

*LOT LINE ADJUSTMENT
FILED

Existing/Proposed Water Supply: Groundwater Well
Existing/Proposed Sewage Disposal: Septic
Fire Protection District: County of Lake / Lakeport
School District: Lakeport

Supplemental Data for Initial Study

The following supplemental information is required for all applications requiring environmental review in accordance with the California Environmental Quality Act (CEQA). Please answer the following questions as thoroughly as possible. If questions do not apply to your project, indicate by writing "N/A" or check "no". Use separate sheets of paper if necessary. **IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE LAKE COUNTY PLANNING DIVISION.**

Description of objective of project and its operational characteristics:

Type of Business: Cannabis Cultivation

Product or service provided: Cannabis Cultivation

Hours of operation: 9-5 M-F
12-5 S-S

Days of operation: 7

Number of shifts (normal): 2

Number of shifts (peak): 2

Employees per shift (normal): 5

Employees per shift (peak): 8-12

Number of deliveries per day: 1-2

Number of customer per day: 0

Number of pick-ups per day: 1-2

Lot size: 40.5 acres

Number and type of company Vehicles: 3
2 p/u truck 1 Bx van

Type of loading facilities: N/A

Floor area of existing structures: 5000 sq ft

Proposed building floor area: 9554 sq ft

Number of existing parking spaces: 4

Number of proposed parking spaces: 8

Number of floors: 1

Additional relevant information: Proposed site is for 2 one
acre cultivation sites with 22,000 sq ft
mixed lighting and 21,560 sq ft outdoor
cultivation for each site. To include
processing and curing building.

Supplemental Data for Initial Study (Continued)

Description of site prep/construction activities

When do you anticipate starting construction?

As soon as permitting is approved by
county (December 2019)
or later

How long will construction take?

1-2 months depending upon contractor
availability and scheduling

What days/times will construction occur?

Monday - Friday 8am - 5pm ; Saturday 12-5pm
No construction on Sundays

What type of construction equipment will be used?

Minimal grading required will use dozer/grading
equipment. Power and hand tools

How many truck/vehicle trips will be necessary for construction?

1-2 trips daily for deliveries, and vehicles
for approximately 5-8 construction workers
during peak construction phase

Will equipment be idling during construction?

~~Minimal~~ Minimal equipment idling during
construction is anticipated.

Where will construction equipment be staged/stored?

Equipment will be staged on-site; and,
stored by existing barn

Will any trees or vegetation be removed? If yes, please provide type and amounts.

Only vineyard will be removed, no other
trees or vegetation.

Supplemental Data for Initial Study (Continued)

How much grading is anticipated to occur and where?

Approximately 15,000 sq ft grading is anticipated for location of new/proposed 9554 sq ft building

Will soil be imported or exported to/from the site? If so from where and what amount?

Soil will be imported for use in raised beds for mixed light cultivation areas Sourced from Soil King, Cloverdale, CA

Is trenching required? If yes, please provide location, dimensions and cubic yards.

Some trenching may be required by PG&E for upgrading electrical service. This is to be determined.

How much water will be used for construction, operation and maintenance? What is the water source?

A maximum of 10,000 gallons is estimated to be used during construction, primarily for dust control if needed during site grading. Source is ground water well

Other questions and information needed for the Initial Study

Describe how scenic views or vistas are impacted by the cultivation site.

Some vineyard will be removed. Cultivation site will have fencing to code with screening of view of cultivation site.

What lighting is proposed for the project? Will areas be lit at night?

Mixed lighting inside greenhouses. Lighting inside building and security light outside building

Are there any existing agricultural uses on-site besides cannabis? Will they be removed?

Vineyards. Some vineyards will be removed for cultivation site. The remaining vineyards will ~~be~~ continue to be farmed if viable ~~and~~

Supplemental Data for Initial Study (Continued)

Will this project result in the loss of forest land? If so, describe how many acres and what type of trees.

NO

How will dust, ash, smoke, fumes or odors generated by the cultivation site be managed?

Minimal dust during/or after construction will be controlled by using water on road for dust control.

Are there any water features (drainages, streams, creeks, lakes, rivers, vernal pools, wetlands, etc.) on-site or immediately adjacent to the project? If yes, will any work take place in or near them?

Tier II Low Risk Site Classification
Class III creek is well over 100 ft from cultivation site. The ^{access road} culvert will be replaced in 2020 to size for "100 yr storm" requirements via CDFW LSA agreement
Will there be a loss of any wetland or streamside vegetation? If yes, describe where, total area, and type of vegetation lost.

No wetland or Vegetation will be lost during culvert replacement.

Describe and site or buildings have any archaeological or historical significance.

N/A

What are the slopes on the cultivation site?

Minimal Slope ^{> 2%} on site as detailed in site Environmental Studies

Supplemental Data for Initial Study (Continued)

Describe the soils found at the site and their potential for landslides, erosion, lateral spreading, subsidence, liquefaction, or collapse.

Detail on soils composition is provided in Environmental Studies Report. There is very little potential for erosion ~~no potential for landslides, lateral spreading~~ Describe methods to be taken to reduce greenhouse gases or liquefaction

Cannabis cultivation produces minimal waste or GHG

Cannabis cultivation will use recommended BMP to reduce all GHG or other waste
Will solid waste be produced? If yes, how will it be disposed of?

There will be regular commercial garbage hauling service. Solid waste will be collected in designated bins

Will hazardous waste be produced? If yes, how will it be disposed of?

Empty pesticide containers will be triple rinsed per CA PPR regs for disposal at approved hazmat site

How will vegetative waste be managed?

Vegetative waste will ~~be~~ be composted on site AND hauled away by contracted waste removal service

How will growth medium waste be managed?

All organic compostable ^{soils and growth medium} materials will be amended and ^{recycled &} re-used in subsequent crops.

Will any material be taken to a landfill? If yes, which one and how much material is anticipated?

Some construction waste, if not recyclable may be taken to landfill. Nearest landfill is at

South Lake Recycling Center and East Lake Landfill.

- Contracted waste services are not expected to exceed 2 yards waste 2 yards Recycling weekly

Supplemental Data for Initial Study (Continued)

Describe risk of an explosion or release of hazardous substances in case of an accident.

All pesticides will be stored in accordance with the ^{CA DPR} and County Regulations. Fuels will be stored in Explosion proof storage.
Do portions of the cultivation site periodically flood?

See Environmental Report / Hydrology drainage report from Hurvitz Environmental

Describe the existing drainage patterns on the site and how they may be alternated and to what degree as a result of this project.

See Environmental Report from Hurvitz Environmental

What Best Management Practices (BMPs) or measures will be implemented in order to prevent erosion and impacts to water quality?

A Site Management Plan has been developed in consultation with Hurvitz Environmental to prevent erosion and minimize impacts to water quality.
Is wastewater treatment required for the project? If yes, what is the source?

The building restrooms will utilize septic. If it is determined RO treatment is needed due to water quality, then an appropriate system will be used for any discharge water.
Describe how this project is consistent with the County's General Plan and Zoning Ordinance.

This cultivation site supports agriculture in the County of Lake and is consistent with its General Plan and Zoning ordinance.

Describe the level and frequency of noise or vibration that will be generated from this project.

The level and frequency of noise or vibration that will be generated will consist of daily planned worker and delivery traffic & Pumps for irrigation system. No other significant noise generation is anticipated or planned

(Resolution No. 2017-19, February 7, 2017) except during the construction phase.

Supplemental Data for Initial Study (Continued)

Describe what measures have been taken to maintain or improve level of service for the appropriate fire district and Cal Fire.

The storage tanks, estimating up to ^{45,000} ~~25,000~~ gallons, will be made available for use by Cal Fire and Lakeport fire district.

How is the site accessed?

Via Voigt road, then right turn onto property onto access road 22" in width to cultivation site.

Describe the amount of traffic the project will generate.

Worker traffic 2 shifts Max daily up to 16 people during peak season.

Are there any road improvements that would be required? If yes, please provide specs (type of materials and dimensions).

Gravel will be added to existing access road to minimize dust and erosion. Minimal grading will be conducted at building site for parking area.

Describe if this project will result increased traffic hazards to motor vehicles, bicyclists, or pedestrians?

This project is not anticipated to result in any increased hazards to motor vehicles, bicyclists or pedestrians due to site location.

Are greenhouses or other accessory structures proposed? If yes, what are the dimensions of the structures and materials/colors they will be constructed out of?

The fence is designed to meet or exceed Lake County Code and will obstruct view of cultivation site.

What sources of energy will be used?

Phase 1 will be PG&E expanded service to 1000 amp 3phase for best handling irrigation system pumps & any lighting.

Voigt Holdings LLC
Voigt Road Cannabis Cultivation Project
550 Voigt Road, Lakeport, CA
Major Use Permit/ County of Lake

Project Description

Voigt Road Commercial Cannabis Cultivation Operation

Elyon Cannabis brand is an established cannabis brand distributed through Bango Distribution which has been doing business in Sonoma County as a licensed cannabis distributor since 2016. Bango Distribution (License C11-0000163-LIC) currently sells Elyon Cannabis to more than 100 licensed dispensaries. Elyon is working with partner growers such as Voigt Holdings LLC to ensure a supply of premium grade cannabis. Elyon Cannabis is one of the largest brands in California and is the number one cultivator, processor, producer and distributor of cannabis in Sonoma County. Elyon Cannabis seeks to become the industry leader in Lake County for processing and distribution services of Lake County cultivated cannabis through the addition of Voigt Holdings LLC commercial cannabis cultivation site, and potentially many additional Lake County cannabis growers to its' long-term supply chain. This cannabis distribution partnership is preceded by over 20 years of friendship, with Voigt Holdings LLC owner, Jonathan McDougall, applicant for commercial cannabis cultivation at 550 Voigt Road, Lakeport, California.

Proposed Commercial Cannabis Cultivation:

Voigt Holdings LLC proposed project is to establish and operate two (2) one-acre Commercial Cannabis Cultivation businesses (For Medical and Adult-Use) on two (2) parcels of land APN 008-032-170 and APN 008-032-110 totaling approximately 40.5 acres. This property will be Lot Line Adjusted to a single 40.5-acre parcel. The property is zoned A-WW-AA which the Zoning District A allows for this use and allows for the Collocation of Permits under its current ordinance, with A Major Use Permit for the project. The project site is located approximately one (1) mile distance from Highway 29 and approximately one (1) mile distance from Highway 175. The property is not located within the Cannabis Cultivation Exclusion Zone.

The cultivation project will require a A-Type 3 Outdoor and an M-Type 3 Outdoor State License to operate. Application for said licenses will commence upon approval of the Major Use Permit application. The applicant has completed, and is in submittal of: Proposed Site Planning Maps; a copy California Secretary of State LLC Registration- Articles of Organization; Copy of Lot Line Adjustment Application information; Archaeological Survey Report; Biological Resources Assessment; Drainage Plan & 100 Year Flow Calculations, Well Information; and, Site Management Plan.

Voigt Holdings LLC
Voigt Road Cannabis Cultivation Project
550 Voigt Road, Lakeport, CA
Major Use Permit/ County of Lake

Site Employment and Traffic Estimates:

The proposed project is to develop two (2) separate one-acre grow sites on the same property which consists of two parcels to be combined to a single 40.5 acre parcel via LLA to be filed with County of Lake as noted above. Approximately 196,000 total square feet will be disturbed for the two grow sites. The plan is to remove poorly producing vineyard with no current contracts to establish the cultivation sites. The method of growing cannabis is through Auto flowering. The outdoor grow operations will be operating seven (7) days per week; 9am-5pm Monday through Friday; and 12-5 pm Saturday and Sunday. Deliveries are anticipated 1-2 per day via pick-up truck or box van. During site construction there will be two shifts with approximately 2-8 people per shift. After construction there will be 1 shift of 5-8 people, dependent upon whether harvesting is occurring. During peak growing season and harvesting, two shifts and additional seasonal staffing will be necessary to meet the work demands.

Cultivation Site Access:

Access to the property is via Voigt Road, which is located at the south western edge of the parcels. The two cultivation sites will be completely fenced in and have additional security measures which will meet minimum requirements as set forth by CDFA CalCannabis regulations and the County of Lake code requirements.

Site Preparation:

The proposed cultivation sites require the clearing of two blocks of older grape vineyards which are no longer viable, or under contract. Vineyard removal will be completed in October of 2019 by the current vineyard management company and Voigt Holdings LLC and soils will be amended for planned outdoor cultivation in 2020. The proposed cultivation sites will not require the removal of any trees or bushes. The existing vineyard access road meets minimum width requirements and will not need to be widened for use as access road to the cultivation site.

Proposed buildings and greenhouses:

The proposed project includes the construction of a 9554 square foot prefabricated metal building is to be used for drying and processing for the cultivation sites. Grading of approximately 15000 square feet will be necessary for placement of the building. An air conditioner and dehumidifier system would be installed in the building. A pre-existing 5000 square foot metal building measuring 50ft x 100 ft currently located on the property will also be utilized for drying and curing. An air conditioner and dehumidifier system would be installed on

Voigt Holdings LLC
Voigt Road Cannabis Cultivation Project
550 Voigt Road, Lakeport, CA
Major Use Permit/ County of Lake

this building. Enough parking for all uses will be provided at the building sites. The building will also house the security office, breakroom and restrooms.

Each cultivation site would consist of 22,000 ft sq. of mixed lighting and 21560 ft sq. of outdoor cultivation. The mixed lighting portion of the cultivation site would have either greenhouses or hoop structures made of clear plastic with shade cloths. Propagation, immature plants, R&D testing for strain selection would occur in the mixed lighting area of the cultivation sites.

Site Security:

Security would meet all CDFA CalCannabis requirements. A video surveillance and security system would be installed per code. In order to take measures to prevent access to the grow operations, protect the safety of the employees, and prevent loss or theft of cannabis, a Security Plan complying with the Ordinance will be provided to the county and implemented on the property.

Electrical service to the sites would be through PG&E. Existing services may need to be expanded to meet the cultivation site needs. Voigt Holdings LLC would work with PG&E for permitting and installation of an additional 1000-amp service to the property.

Water Resources & Water Boards Classification:

Cannabis General Order Application number 42083, and associated water board fees have been completed and submitted to determine water board general order eligibility status and site classification. The cultivation site would be classified as a Tier 2-Low Risk site by California Water Boards. A Class III seasonal stream runs adjacent to the property; however, the proposed cultivation site location exceeds the required 100-foot set back requirements.

Complete environmental studies including a hydrology drainage report have been contracted through Hurvitz Environmental and will be provided to the County of Lake and CA Water Board as part of the MUP and cannabis licensing application process.

Water for cultivation site irrigation would come from an existing well, and proposed well, located on the property. To ensure needed water supply during peak season usage, a new well would be permitted and drilled. A water storage and treatment system would be installed to address water quality issues. found in the existing wells and in the area to make the water

Voigt Holdings LLC
Voigt Road Cannabis Cultivation Project
550 Voigt Road, Lakeport, CA
Major Use Permit/ County of Lake

usable for cannabis irrigation use. A minimum of three (3) 10000-gallon storage tanks; two (2) 5000-gallon; and, (2) 2500-gallon, water storage tanks would be needed for well water settling and treatment system for irrigation system. Access to the water storage tanks would be made available for emergency use by Lake County Fire and CalFire for fire management purposes.

Environmental studies:

Hurvitz Environmental of 105 Morris Street, Sebastopol CA has been contracted for Cultural Resources CHRIS and NAHC search; Cultural Survey Pedestrian survey; Cultural Resources Technical Report; Biological Resources Assessment; Preparation of Site Management Plan; Preparation of Nitrogen Plan; Hydrological Drainage Survey and report. A copy of all environmental studies and Site Management Plan will be provided to the County of Lake as part of the MUP application process.

Site Management Plans:

All required information on the site management plan, storm water management plan, pest management, vegetative waste disposal, solid waste disposal, protection of cultural resources, grounds management procedures, organic farming plan, growing medium management and energy use will be provided as needed for review of the application and preparation of the Initial Study for the project.

Development Schedule:

With submission of Major Use Permit application on November 4th to the County of Lake, it is anticipated that the two cannabis cultivation projects would be implemented as early as possible after determination of the Major Use Permit application is deemed to be complete. Voigt Holdings LLC intent is to apply for "Early Activation" and to meet early activation requirements as soon as possible with an anticipation of beginning planting outdoors in March of 2020. The intention is to apply for permits for a new ground water well, septic, and building permits for the metal drying/processing building, and all greenhouses, so that permits may be obtained as soon as possible after review and approval by the County/Commission.

Contribution to Local Economy:

In addition to adding to the Lake County property and cannabis tax revenue base, the supplies, materials and services that are needed for the project will be purchased from local area businesses. Business services are or will be contracted through local area businesses such as: Conser Land Survey; Rosenthal Networks; Mendo-Mill Home Center and Lumber Company ;

Voigt Holdings LLC
Voigt Road Cannabis Cultivation Project
550 Voigt Road, Lakeport, CA
Major Use Permit/ County of Lake

Tractor Supply, Weeks Drilling and Well, agricultural product, fuel suppliers and other local business service providers, therefore increasing both base and tax revenue into the local economy. Cultivation site employees will be hired from the local community area, thereby providing local jobs which will further contribute to the local economy in Lake County.

Property Zoning and coordinates:

550 Voigt Road, Lakeport, CA consists of 40 acres on APN 008-032-170 and APN 008-032-170 which is zoned A or Agriculture; Full zoning A-WW-A and General Plan A
Site Latitude 38.988192 and Longitude -122.901012

Neighboring Properties Zoning and (Proximity to Site):

APN 008-032-14 Address 620 Voigt Road Zoning A Full Zoning A-WW-AA General Plan A (400 ft)
APN 008-032-16 Address 610 Voigt Road; Zoning A; Full Zoning A-AA General Plan A (500 ft)
APN 008-043-02 Address 425 Voigt Road; Zoning A; Full Zoning A-WW-AA; General Plan A (800 ft)

APN 008-032-17 Address 485 Voigt Road; Zoning A; Full Zoning A-AA; General Plan A (900 ft)
APN 008-032-03 Address 455 Voigt Road; Zoning A; Full Zoning A-AA; General Plan A (900 ft)
APN 008-043-18 Address 545 Voigt Road; Zoning A; Full Zoning A-AA; General Plan A (750 ft)
APN 008-043-19 Address 605 Voigt Road; Zoning A; Full Zoning A-AA; General Plan A (750 ft)

APN 008-032-51 Address 4615 Work Right Circle ; Zoning PDC Full Zoning PDC-DR-AA; General Plan I (700 ft)

APN 008-032-44 Address 4550 George Road; Zoning A, Full Zoning A-WW-AA; General Plan A (150 ft)

APN 008-032-29 Address 4675 George Road; Zoning A; Full Zoning A-WW-AA; General Plan A (200 ft)

APN 008-032-33 Address 4840 George Road; Zoning A; Full Zoning A-AA; General Plan A (800 ft)

APN 008-032-34 Address 4850 George Road; Zoning A; Full Zoning A-AA; General Plan A (900 ft)

APN 008-032-35 Address 4860 George Road; Zoning A; Full Zoning A-AA; General Plan A (1000 ft)

APN 008-032-23 Address 4920 George Road; Zoning A; Full Zoning A-AA; General Plan A (1000 ft)

APN 008-043-06 Address 5125 Highland Springs Road; Zoning A; Full Zoning A-SC-AA (800 ft)

From: [Peggy Barthel](#)
To: [Victoria Kim](#)
Cc: [Ronald Yoder](#)
Subject: RE: Request For Review (Major Use Permit, UP19-14; Initial Study, IS19-60; Early Activation, EA19-66)
Date: Friday, December 6, 2019 11:41:08 AM

If the grading exceeds 500 cubic yards for building installation, a grading permit will be required.

Peggy Barthel
Associate Resource Planner
707-263-2221

From: Victoria Kim [mailto:victoria.kim@lakecountyca.gov]
Sent: Monday, December 2, 2019 10:37 AM
To: mike.wink@fire.ca.gov; pbleuss@kelseyvillefire.com; fdchf700@yahoo.com; larrythompson956@gmail.com; chief500@lakeportfire.com; chief800@northshorefpd.com; gloria.fong@fire.ca.gov; Steven Hajik <Steven.Hajik@lakecountyca.gov>; Ryan Lewelling <Ryan.Lewelling@lakecountyca.gov>; Mary Jane Montana <MaryJane.Montana@lakecountyca.gov>; Scott DeLeon <Scott.DeLeon@lakecountyca.gov>; Kelli Hanlon <Kelli.Hanlon@lakecountyca.gov>; Doug Gearhart <dougg@lcaqmd.net>; fahmya@lcaqmd.net; Elizabeth Knight <elizabethk@lcaqmd.net>; Lucas Bingham <Lucas.Bingham@lakecountyca.gov>; Lori Baca <Lori.Baca@lakecountyca.gov>; Gordon Haggitt <Gordon.Haggitt@lakecountyca.gov>; Greg Peters <Greg.Peters@lakecountyca.gov>; Yuliya Osetrova <Yuliya.Osetrova@lakecountyca.gov>; anafus@blm.gov; kevinponce@cdfa.ca.gov; rex.jackman@dot.ca.gov; centralvalleysac@waterboards.ca.gov; kyle.stoner@wildlife.ca.gov; Peggy Barthel <Peggy.Barthel@lakecountyca.gov>; Ronald Yoder <Ronald.Yoder@lakecountyca.gov>; pgenorthernagencyins@pge.com; t4b5@pge.com; nwic@sonoma.edu; Tina Scott <Tina.Scott@lakecountyca.gov>
Subject: Request For Review (Major Use Permit, UP19-14; Initial Study, IS19-60; Early Activation, EA19-66)

Good morning,

Please review attached and send any comments by December 16, 2019.

Thank you,

Victoria Kim
Assistant Planner
Community Development Department
255 N. Forbes St.
Lakeport, CA 95453
P: (707) 263-2221 | F: (707) 263-2225

Files attached to this message

Filename	Size	Checksum (SHA256)
Site Management Plan.pdf	24.8 MB	dba5fa6ffe0468eb95ced5f5b51993a34160fb2c17eccfb30ce4baca7aa49519
Attachments of Site Management	2.73 MB	a7d0371788b28bf25601902cfd8db2cc60be44741a16bfbdl0d1591e082d65ab

Plan.pdf

RFR UP 19-41.pdf	249 KB	fb42e9493862f87788e821cef97f10cf9f542342d9b468421c412e95e000c888
Supplemental Data.pdf	6.3 MB	137e84fff808d31130719365cfa645ec9012a7b65811fd93816e3dbe242c73a8
Project Description.pdf	3.9 MB	5e2d28584c2146b1ceebcaa181055110e501743838d9d158029816a3151acb8ab
LLA19-10.pdf	1.19 MB	70ccac1d0c9b73f01edc0aca2acbe7cd5b545a67dbf6073fab93cbb90a8bad8b

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From: [Peggy Barthel](#)
To: [Victoria Kim](#)
Cc: [Ronald Yoder](#)
Subject: RE: Request For Review 2 (Major Use Permit, UP19-41; Initial Study, IS19-60; Early Activation, EA19-66)
Date: Thursday, December 19, 2019 8:54:54 AM

The Site Management Plan says grape vines would be removed. The soil at these parcels have a moderate erosion hazard rating. Therefore, a **grading permit is required** for crop conversion. Grading, including crop conversion, can only take place between April 15 and October 15.

If the internal road doesn't meet 4290/4291 standards, road improvements may require a grading permit.

Stormwater management plans should be reviewed by Ron Yoder.

Peggy Barthel
Associate Resource Planner
707-263-2221

From: Victoria Kim [mailto:Victoria.Kim@lakecountycalifornia.gov]
Sent: Tuesday, December 10, 2019 4:39 PM
To: mike.wink@fire.ca.gov; pbleuss@kelseyvillefire.com; fdchf700@yahoo.com; larrythompson956@gmail.com; chief500@lakeportfire.com; chief800@northshorefpd.com; gloria.fong@fire.ca.gov; Steven Hajik <Steven.Hajik@lakecountycalifornia.gov>; Ryan Lewelling <Ryan.Lewelling@lakecountycalifornia.gov>; Mary Jane Montana <MaryJane.Montana@lakecountycalifornia.gov>; Scott DeLeon <Scott.DeLeon@lakecountycalifornia.gov>; Kelli Hanlon <Kelli.Hanlon@lakecountycalifornia.gov>; Doug Gearhart <doug@lcaqmd.net>; fahmya@lcaqmd.net; Elizabeth Knight <elizabethk@lcaqmd.net>; Lucas Bingham <Lucas.Bingham@lakecountycalifornia.gov>; Lori Baca <Lori.Baca@lakecountycalifornia.gov>; Gordon Haggitt <Gordon.Haggitt@lakecountycalifornia.gov>; Greg Peters <Greg.Peters@lakecountycalifornia.gov>; Yuliya Osetrova <Yuliya.Osetrova@lakecountycalifornia.gov>; anafus@blm.gov; kevinponce@cdfa.ca.gov; rex.jackman@dot.ca.gov; centralvalleysac@waterboards.ca.gov; kyle.stoner@wildlife.ca.gov; Peggy Barthel <Peggy.Barthel@lakecountycalifornia.gov>; Ronald Yoder <Ronald.Yoder@lakecountycalifornia.gov>; pgenorthernagencyins@pge.com; t4b5@pge.com; nwc@sonoma.edu; Tina Scott <Tina.Scott@lakecountycalifornia.gov>
Subject: Request For Review 2 (Major Use Permit, UP19-41; Initial Study, IS19-60; Early Activation, EA19-66)

Good afternoon,

Attached zip folder contains additional site plans received from the applicant last week. Please review them and send any comments by December 23, 2019.

Thank you,

Victoria Kim
Assistant Planner
Community Development Department
255 N. Forbes St.
Lakeport, CA 95453
P: (707) 263-2221 | F: (707) 263-2225

Files attached to this message

Filename	Size	Checksum (SHA256)
Site Plans UP 19-41.zip	76.8 MB	cb5deebb358a111dcfc9e1080a6e1ed5c3ffdf9e915be662fae473a8bc329e38

Please click on the following link to download the attachments:
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Message ID: eddpOoUbiXSaRdJqHv7LGj

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From: [Ronald Yoder](#)
To: [Victoria Kim](#)
Subject: RE: Request for Review UP 19-30; DR 19-06; IS 19-48
Date: Thursday, December 12, 2019 10:25:24 AM

Victoria, A grading permit is required for the removal of the vineyard and orchard if it is to be cleared. Other land clearing activities should be included in the grading permit. Post construction source controls seem adequate. Any grading exemptions can be determined after receipt of the grading permit application. Building permits allow 500 cu. Yds. To be exempted. Clearing of woody vegetation such as vineyards and orchards are not exempt. Clearing of up to 10,000 square feet of vegetation is exempt. grass-weeds and clearing a previous ag use area is exempt except as stated above plants with woody root systems, grapes, fruit, nut trees are not.

Ronald Yoder
Grading Stormwater Inspector II

From: Ronald Yoder
Sent: Tuesday, December 10, 2019 2:46 PM
To: Simone Hingston <Simone.Hingston@lakecountyca.gov>
Subject: RE: Request for Review UP 19-30; DR 19-06; IS 19-48

Simone, I have no comments for this project.

Ron Yoder

From: Simone Hingston
Sent: Friday, December 6, 2019 3:58 PM
To: Doug Gearhart <dougg@lcaqmd.net>; fahmya@lcaqmd.net; Elizabeth Knight <elizabethk@lcaqmd.net>; Richard Ford <Richard.Ford@lakecountyca.gov>; Jim Campbell <Jim.Campbell@lakecountyca.gov>; David Casian <David.Casian@lakecountyca.gov>; Scott DeLeon <Scott.DeLeon@lakecountyca.gov>; Kelli Hanlon <Kelli.Hanlon@lakecountyca.gov>; Lucas Bingham <Lucas.Bingham@lakecountyca.gov>; Lori Baca <Lori.Baca@lakecountyca.gov>; Gordon Haggitt <Gordon.Haggitt@lakecountyca.gov>; Greg Peters <Greg.Peters@lakecountyca.gov>; chief500@lakeportfire.com; pbleuss@kelseyvillefire.com; chief800@northshorefpd.com; Gloria.Fong@fire.ca.gov; Mandi.Huff@fire.ca.gov; mike.wink@fire.ca.gov; Fdchf700@yahoo.com; mike.wink@fire.ca.gov; PGENorthernAgencyIns@pge.com; T4b5@pge.com; R2CEQA@wildlife.ca.gov; Rex.Jackman@dot.ca.gov; nwic@sonoma.edu; Peggy Barthel <Peggy.Barthel@lakecountyca.gov>; Ronald Yoder <Ronald.Yoder@lakecountyca.gov>; Tina Scott <Tina.Scott@lakecountyca.gov>
Subject: Request for Review UP 19-30; DR 19-06; IS 19-48
Importance: High

Subject: Request For Review UP 19-30; DR 19-06; IS 19-48

Good Afternoon Fellow Agencies,

Please review the attached RFR and advise if your agency recommends any modifications to the project. Due to the provisions of state law, it is essential that we receive your comments as soon as possible but in no case later than, **Friday, December 20, 2019**. Please email your comments to **Simone Hingston** at simone.hingston@lakecountyca.gov or mail them to the address listed in the letterhead above.

Please review the attachments for further details.

Simone Hingston - Assistant Planner

Lake County – Community Development Department
255 N. Forbes Street, Lakeport, CA 95453
County Website: www.lakecountyca.gov
Phone: (707) 263-2221

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Sonoma State University
150 Professional Center Drive, Suite E
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
<http://www.sonoma.edu/nwic>

December 11, 2019

File No.: 19-0928

Victoria Kim, Project Planner
County of Lake
Community Development Department
255 N. Forbes Street
Lakeport, CA. 95453

re: County File Number UP 19-41, IS 19-60, EA 19-66 / 550 Voigt Road, Lakeport / Voigt Holdings, LLC

Dear Ms. Kim:

Records at this office were reviewed to determine if this project could adversely affect cultural resources. Please note that use of the term cultural resources includes both archaeological sites and historical buildings and/or structures. The review for possible historic-era building/structures, however, was limited to references currently in our office and should not be considered comprehensive.

Project Description: The proposed project entails the development of two 1-acre Commercial Cannabis Cultivation businesses for medical and adult-use on two parcels totaling approximately 40.5 acres. The property will be lot line adjusted to a single 40.5-acre parcel. The project will also include the removal of an existing vineyard, as well as the construction of a 9,554 square foot prefabricated metal building to be used for drying and processing. Grading of approximately 15,000 square feet will be necessary. Each cultivation site will consist of 22,000 square feet of mixed light and 21,560 square feet of outdoor cultivation. The mixed light portion of the cultivation site will have either greenhouses or hoop structures.

Previous Studies:

XX This office has no record of any previous cultural resource studies for the proposed project area (see *recommendation below*).

Archaeological and Native American Resources Recommendations:

XX Based on an evaluation of the environmental setting and features associated with known sites, Native American resources in this part of Lake County have been found near areas populated by oak and buckeye, as well as near a variety of plant and animal resources. Sites are also found near watercourses and on lakeshores. The proposed project area encompasses flat terraces near wooded areas. The project

area contains a creek and is in proximity to several other watercourses. Given the similarity of one or more of these environmental factors, there is a moderate potential for unrecorded Native American resources in the proposed project area.

We therefore recommend that a qualified archaeologist conduct further archival and field study to identify cultural resources. Field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of archaeological resources. Please refer to the list of consultants who meet the Secretary of Interior's Standards at <http://www.chrisinfo.org>.

XX We recommend that the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at (916) 373-3710.

Built Environment Recommendations:

XX Since the Office of Historic Preservation has determined that any building or structure 45 years or older may be of historical value, if the project area contains such properties, it is recommended that prior to commencement of project activities, a qualified professional familiar with the architecture and history of Lake County conduct a formal CEQA evaluation.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

For your reference, a list of qualified professionals in California that meet the Secretary of the Interior's Standards can be found at <http://www.chrisinfo.org>. If archaeological resources are encountered during the project, work in the immediate vicinity of the finds should be halted until a qualified archaeologist has evaluated the situation. If you have any questions, please contact our office at nwic@sonoma.edu or at (707) 588-8455.

Sincerely,

Jessika Akmenkalns, Ph.D.
Researcher

From: [Gordon Haggitt](#)
To: [Victoria Kim](#)
Subject: RE: Request For Review (Major Use Permit, UP19-14; Initial Study, IS19-60; Early Activation, EA19-66)
Date: Monday, December 9, 2019 3:07:59 PM

Victoria: I have two questions/concerns regarding this one. First is the lot line adjustment that is currently pending. After looking at it again they want to take a current parcel shown as being over 40 acres and reducing it to about 18 acres and the other (APN 008-032-17) is growing from about 16 to 40 plus acres. My question is if 008-032-11 is an existing conforming parcel at 40+ acres I'm not sure we can reduce it to a nonconforming size. Just something to look at. The next question is the access. Currently both parcels have access to Voight Road but the proposed property line is moving westerly so there needs to be something in place to insure continued access to the "new parcel 2". Also, I don't know if 40 acres is the minimum for cannabis cultivation in this area but if so they will need a survey to prove they have that. I believe Conser is working on that. Anyway, these are my comments. Thanks, Gordon

Gordon M. Haggitt
County Surveyor, County of Lake
(707)263-2341

From: Victoria Kim [mailto:victoria.kim@lakecountyca.gov]
Sent: Monday, December 02, 2019 10:37 AM
To: mike.wink@fire.ca.gov; pbleuss@kelseyvillefire.com; fdchf700@yahoo.com; larrythompson956@gmail.com; chief500@lakeportfire.com; chief800@northshorepd.com; gloria.fong@fire.ca.gov; Steven Hajik <Steven.Hajik@lakecountyca.gov>; Ryan Lewelling <Ryan.Lewelling@lakecountyca.gov>; Mary Jane Montana <MaryJane.Montana@lakecountyca.gov>; Scott DeLeon <Scott.DeLeon@lakecountyca.gov>; Kelli Hanlon <Kelli.Hanlon@lakecountyca.gov>; Doug Gearhart <dougg@lcaqmd.net>; fahmya@lcaqmd.net; Elizabeth Knight <elizabethhk@lcaqmd.net>; Lucas Bingham <Lucas.Bingham@lakecountyca.gov>; Lori Baca <Lori.Baca@lakecountyca.gov>; Gordon Haggitt <Gordon.Haggitt@lakecountyca.gov>; Greg Peters <Greg.Peters@lakecountyca.gov>; Yuliya Osetrova <Yuliya.Osetrova@lakecountyca.gov>; anafus@blm.gov; kevinponce@cdfa.ca.gov; rex.jackman@dot.ca.gov; centralvalleysac@waterboards.ca.gov; kyle.stoner@wildlife.ca.gov; Peggy Barthel <Peggy.Barthel@lakecountyca.gov>; Ronald Yoder <Ronald.Yoder@lakecountyca.gov>; pgenorthernagencyins@pge.com; t4b5@pge.com; nwic@sonoma.edu; Tina Scott <Tina.Scott@lakecountyca.gov>
Subject: Request For Review (Major Use Permit, UP19-14; Initial Study, IS19-60; Early Activation, EA19-66)

Good morning,

Please review attached and send any comments by December 16, 2019.

Thank you,

Victoria Kim
Assistant Planner
Community Development Department
255 N. Forbes St.
Lakeport, CA 95453
P: (707) 263-2221 | F: (707) 263-2225

Files attached to this message

Filename	Size	Checksum (SHA256)
Site	24.8	dba5fa6ffe0468eb95ced5f5b51993a34160fb2c17eccfb30ce4baca7aa49519

Management Plan.pdf	MB	
Attachments of Site Management Plan.pdf	2.73 MB	a7d0371788b28bf25601902cfd8db2cc60be44741a16bfbd10d1591e082d65ab
RFR UP 19-41.pdf	249 KB	fb42e9493862f87788e821cef97f10cf9f542342d9b468421c412e95e000c888
Supplemental Data.pdf	6.3 MB	137e84fff808d31130719365cfa645ec9012a7b65811fd93816e3dbe242c73a8
Project Description.pdf	3.9 MB	5e2d28584c2f46bfcebbca181055ff0e501743838d9d158029816a3151acb8ab
LLA19-10.pdf	1.19 MB	70ccac1d0c9b73f01edc0aca2acbe7cd5b545a67dbf6073fab93cbb90a8bad8b

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Victoria Kim

From: Fahmy Attar <FahmyA@lcaqmd.net>
Sent: Monday, December 2, 2019 11:03 AM
To: Victoria Kim
Subject: [EXTERNAL]Re: Request For Review (Major Use Permit, UP19-14; Initial Study, IS19-60; Early Activation, EA19-66)

Victoria,

For a Cannabis operation site, here is a list of requirements they must meet (if it applicable):

1. Any manufacturing or delivery operations must comply with LCAQMD rules and regulations. An application must be submitted. contact LCAQMD for more details.
2. Construction activities that involve pavement, masonry, sand, gravel, grading, and other activities that could produce airborne particulate should be conducted with adequate dust controls to minimize airborne emissions. A dust mitigation plan may be required should the applicant fail to maintain adequate dust controls.
3. Mobile diesel equipment used for construction and/or maintenance must be in compliance with State registration requirements. Portable and stationary diesel-powered equipment must meet the requirements of the State Air Toxic Control Measures for CI engines. The applicant should contact the District for further information if the project includes a backup generator. Installation of backup generator requires review and approval from LCAQMD.
4. Off-site odor impacts should be mitigated to minimize nuisance to nearby residences, property, and public roads.
5. Site development, site operation and vegetation disposal shall not create nuisance odors or dust. During the site preparation phase, the District recommends that any removed vegetation be chipped and spread for ground cover and erosion control. Burning is not allowed on commercial property, materials generated from the commercial operation, and waste material from construction debris, must not be burned as a means of disposal.
6. Any demolition or major renovation is subject to the Federal National Emissions Standard for Hazardous Air Pollutants (NESHAP) for asbestos in buildings requires asbestos inspections by a Certified Asbestos Consultant for all major renovations and all demolition. An Asbestos Notification must be submitted to the District at least 14 days prior to beginning any demolition work. The applicant should contact the District for details. Regardless of asbestos content, all demolition activities should use adequate water/ amended water to prevent dust generation and nuisance conditions.
7. If the construction site address contains Serpentine, approval from LCAQMD and a Serpentine control plan is required unless otherwise determined by the LCAQMD. Please contact LCAQMD for more details.
8. Significant dust may be generated from increase vehicle traffic if driveways and parking areas are not adequately surfaced. Surfacing standards should be included as a requirement in the use permit to minimize dust impacts to the public, visitors, and road traffic. At a minimum, the District recommends chip seal as a temporary measure for primary access roads and parking. Paving with asphaltic concrete is preferred and should be required for long term occupancy. All areas subject to semi truck / trailer traffic should require asphaltic concrete paving or equivalent to prevent fugitive dust generation. Gravel surfacing may be adequate