APPENDIX NOP

NOP COMMENT LETTERS

California
Department of Conservation
Division of Land Resource Protection

Gavin Newsom, Governor
David Bunn, Director

May 8, 2019

VIA EMAIL: GUENOCVALLEYCOMMENTS@LAKECOUNTYCA.GOV
Ms. Michalyn DelValle
Community Development Director
255 N. Forbes Street
Lakeport, CA 95453

Dear Ms. DelValle:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GUENOC VALLEY MIXED-USE PLANNED DEVELOPMENT PROJECT,

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Guenoc Valley Mixed-Use Planned Development Project. The Division monitors farmland conversion on a statewide basis and administers the Williamson Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The proposed project consists of the development of a master planned mixed-use resort community within the 16,000-acre Guenoc Valley Ranch property in southeast Lake County. Proposed land uses include a destination luxury resort, consisting of five hotels, resort residential units, single family residential villas/estates and recreational facilities, as well as commercial centers (i.e. the Farmstead Compound), modified agricultural production, and associated supporting infrastructure. Proposed outdoor recreational and resort amenities include two wineries, a wellness center and spa, golf course, equestrian facilities, polo grounds, and wilderness camp.

Other undeveloped areas of the project site will continue to be rural lands and will remain in managed grazing which is an integral part of the fire management plan being developed for the site along with an on-site fire station. Project components would be developed over multiple phases. The first phase would be constructed in the near-term (approximately the next ten years) and would be analyzed in the Draft EIR at a project level. Future phases will be built out based on market demands and the Draft EIR will analyze these on a programmatic level.

Department Comments

The Department recommends the following discussion under the Agricultural Resources section of the Environmental Impact Report:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

Although direct conversion of agricultural land is often an unavoidable impact under CEQA analysis, mitigation measures must be considered. In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts.

All mitigation measures that are potentially feasible should be considered. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements. The Department suggests that the County consider the adoption of an agricultural land mitigation program that will effectively mitigate the conversion of agricultural land.

Agricultural Mitigation Program

Agricultural conservation easements are an available mitigation tool that the County should consider. The Department highlights easements as a mitigation tool because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because they follow an established rationale similar to that of wildlife habitat mitigation.

Programs that establish agricultural conservation easements and in-lieu fees for mitigation banking are most effective at conserving comparable quality agricultural land when the easement requirements or fees are determined concurrent with project approval. Should significant time elapse between initial approval and the applicant's receipt of a building or grading permit, conflict may arise over the agricultural quality or value of the land being converted.

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose

includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A source that has proven helpful for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

http://www.calandtrusts.org/resources/conserving-californias-harvest/

Another source is the Division's California Farmland Conservancy Program (CFCP), which has participated in bringing about conservation easements throughout the State of California involving many California land trusts. Any other feasible mitigation measures should also be considered.

Conclusion

Thank you for giving us the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Guenoc Valley Mixed-Use Planned Development Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

Monique Wilber

Monique Wilber
Conservation Program Support Supervisor

Callayomi County Water District

Mark Roberts

From:	Byron Turner
Sent:	Tuesday, May 14, 2019 5:04 PM
To:	Bibiana Alvarez
Cc:	Mark Roberts
Subject:	FW: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Attachments:	Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development.pdf
Importance:	High

From: John Hamner [mailto:ccwdhamner@att.net]
Sent: Monday, May 13, 2019 12:32 PM
To: Guenocvalleycomments - Email <Guenocvalleycomments@lakecountyca.gov>
Cc: 'Laura Pimentel' <ccwdlaura@att.net>
Subject: RE: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Importance: High

Mr. Roberts,

This project topic was placed on the agenda for the May 9, 2019 regular board meeting of the Callayomi County Water District (CCWD) for discussion. The CCWD has no comments on the proposed project on "Section 1 the Guenoc Valley Site". However, we do have comments on section "2.2 Proposed off-site workforce housing site located in Middletown" and all sections associated with Section 2.2.

- Throughout the document there are references to unnamed new water sources. The CCWD is opposed to any new public drinking water wells that may affect the CCWD current and future water sources.

- The State Water Resources Control Board, Drinking Water Division (DDW) oversees all public water systems in California. What is being proposed are new public water systems. The DDW has been promoting public drinking water systems throughout the state to consolidate when possible. The offsite workforce housing site in Middletown would be considered a public water system based on the number of homes/people served. Since this newly proposed public water system is located next to an existing public water system, it is unlikely that this new system would secure the DDW permit required by law to be a public water system. The DDW will most likely recommend that the proposed off-site workforce housing site located in Middletown approach the CCWD regarding connecting to the CCWD public water system.

Assuming that the CCWD would be approached regarding this project, the entity would be required to meet certain requirements.

- The Local Agency Formation Commission (LAFCO) is tasked with ensuring that public entities adhere to state laws regarding municipality expansion. The CCWD would require this "subdivision" to be annexed into the District, at the cost of the developer.

- The CCWD would need to provide the developer with a "Will Serve Letter". This would required that all water system components (pipes, valves, hydrants etc.) installed by the developer meet CCWD standard. It would also

need to be determined if the impact on the CCWD system capacity were impacted by the CCWD engineer. If the capacity impact is determined to be substantial, we could require improvements to our water supply system.

Regards,

John Hamner
General Manager
Callayomi County Water District
707-987-2180

From: Mark Roberts <Mark.Roberts@lakecountyca.gov>
Sent: Tuesday, April 23, 2019 5:50 PM
To: Doug Gearhart <dougg@lcaqmd.net>; elizabethk@lcaqmd.net; Ryan Lewelling <Ryan.Lewelling@lakecountyca.gov>; Richard Ford <Richard.Ford@lakecountyca.gov>; Mary Jane Montana <MaryJane.Montana@lakecountyca.gov>; Kelli Hanlon <Kelli.Hanlon@lakecountyca.gov>; Craig Wetherbee <Craig.Wetherbee@lakecountyca.gov>; Lars Ewing <Lars.Ewing@lakecountyca.gov>; Scott DeLeon <Scott.DeLeon@lakecountyca.gov>; Todd Mansell <Todd.Mansell@lakecountyca.gov>; Gloria Gregore <Gloria.Gregore@lakecountyca.gov>; Brian Martin <Brian.Martin@lakecountyca.gov>; Chris Macedo <Chris.Macedo@lakecountyca.gov>; Lori Baca <Lori.Baca@lakecountyca.gov>; Gordon Haggitt <Gordon.Haggitt@lakecountyca.gov>; Greg Peters <Greg.Peters@lakecountyca.gov>; lmccollough@candswaste.com; David Cowan <David.Cowan@lakecountyca.gov>; Yuliya Osetrova <Yuliya.Osetrova@lakecountyca.gov>; spekaj@dow-associates.com; laketransit@comcast.net; ccwdhamner@att.net; dave.munch@fire.ca.gov; Melissa.M.France@usace.army.mil; Ryan_olah@fws.gov; Kelsey.Vella@wildlife.ca.gov; Leishara.Ward@dot.ca.gov; Christopher.Brooks@dot.ca.gov; nwic@sonoma.edu; ron.parsons@parks.ca.gov; centralvalleysac@waterboards.ca.gov; helpline@arb.ca.gov; R2CEQA@wildlife.ca.gov; DLRP@conservation.ca.gov; Sheri.Miller@waterboards.ca.gov; Sheri.Miller@waterboards.ca.gov; mike.wink@fire.ca.gov; lcfrmbureau@sbcglobal.net; dave.rosenthal@sbcglobal.net; robert@rntkonoctiwines.com; president@redbudaudubon.org; vbrandon@lakelive.info; mathtownhall@gmail.com; bill.solinsky@fire.ca.gov; centralvalleysac@waterboards.ca.gov; nwic@sonoma.edu; Steven Hajik <Steven.Hajik@lakecountyca.gov>; Kelli Hanlon <Kelli.Hanlon@lakecountyca.gov>
Cc: Michalyn DelValle <Michalyn.DelValle@lakecountyca.gov>; Byron Turner <Byron.Turner@lakecountyca.gov>
Subject: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Importance: High

Good Afternoon Agencies,

This email is in regards to the Notice of Preparation of an Environmental Impact Report (EIR) for the proposed Guenoc Valley Mixed Use-Planned Development. The above attachment is a detailed Notice of Preparation Packet regarding the proposed use for you to review and provide the necessary comments. Please keep in mind, the commenting period is from April 23, 2019 through May 23, 2019. If you have any questions, please let me know.

Sincerely,

Mark Roberts – Senior Planner

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

Virus-free. www.avg.com

A Tradition of Stewardship
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Planning, Building & Environmental Services

1195 Third Street, Suite 210
Napa, CA 94559
www.countyofnapa.org

David Morrison
Director

RECEIVED

MAY 28 2019

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT.

May 23, 2019

Michalyn DelValle
Community Development Director
County of Lake
255 N. Forbes Street
Lakeport, CA 95453

RE: **GUENOC VALLEY MIXED-USE PLANNED DEVELOPMENT**
Response to Notice of Preparation

Dear Ms. DelValle:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) that will be prepared for the Guenoc Valley Mixed-Use Development in southern Lake County. A substantial portion of the project's southeastern boundary is the Lake/Napa County border. The applicant's property holdings also extend into Napa County beyond the project boundary shown in the NOP's site plan. It is unclear from the materials included in the NOP whether any of the existing legal lots lying on the Lake/Napa border span both counties, and whether any of the proposed development will occur within Napa County. Napa County requests additional detail on the scope of the project in order for Napa County to determine our extent of jurisdiction over the project:

1. Please either upload all current application materials to the project's webpage or mail a complete copy, including the proposed tentative map, planned development plans, and civil plans including proposed grading, drainage, and utility improvements including water and sewage systems.

2. Please provide groundwater well locations as noted on pages 10 and 13 of the NOP.

3. Please provide the location and extent of any road/circulation network improvements that may be proposed within Napa County.

4. Please provide the location and extent of any power grid improvements, including the location of alternative energy production facilities noted on page 7 of the NOP such as the off-site solar generate project.

Napa County requests the following items be addressed within the Draft EIR:

1. Project Description

a. General Plan Amendment – Detail the extent of proposed policy and exhibit/map amendments to the Lake County General Plan.
b. The EIR project description and exhibits should identify all improvements and subdivision boundaries occurring within Napa County, and/or describe the degree of setbacks proposed from the Napa County boundary.
c. Off-site Improvements – Provide details on the extent of all off-site improvements that may occur within Napa County.
d. Upper Bohn Reservoir Improvements and Uses – Approximately half of Upper Bohn Reservoir lies within Napa County. Pages 7 and 8 of the NOP project description note several improvements and resort uses intended for the water body. The EIR project description should described the extent of improvements and recreation activities intended to occur within Napa County.
e. Water/Wastewater Systems Improvements – There are several vineyard tracts within Napa County that are owned by the project applicant, and which are generally adjacent to the proposed project. The NOP project description notes that potable water, irrigation water, recycled water, and wastewater systems will be extended throughout the project site. The EIR project description should describe the extent of water and wastewater improvements proposed within Napa County, or if no improvements will occur within Napa County, describe the design features that preclude connectivity with the applicant's Napa County developments.

2. Air Quality – Air Quality modeling and analysis should evaluate changes to air quality within Napa County. Napa County lies within the Bay Area Air Quality Management District (BAAQMD), so the EIR should considered BAAQMD thresholds in addition to Lake County Air Quality Management District Thresholds.

3. Biological Resources – The EIR should consider the project's potential to impact biological resources within Napa County. Napa County's Conservation Regulations (Napa County Code Chapter 18.108) will apply to any improvements or land uses occurring within Napa County. For example, improvements occurring within Napa County's portion of Upper Bohn Reservoir would be subject to these Conservation Regulations. The EIR should evaluate the project potential to impact wildlife movement corridors between Lake and Napa Counties.

4. Cultural and Tribal Resource – There are cultural resource sites within Napa County that are in close proximity to the project. The EIR should evaluate the project's potential to impact these resources.

5. Airport Land Use Compatibility – The EIR should evaluate the frequency and characteristics of overflights occurring within Napa County as a result of the proposed new airport and helipads. The EIR should evaluate the project's potential to result in noise, safety, airspace protection, and overflight impacts within Napa County. The State Aeronautic Act requires Lake County Airport Land Use Commission review of any proposal for a new airport (Public Utilities Code 21661.5). Airport land use compatibility measures within Napa County are under the jurisdiction of the Napa County Airport Land Use Commission.

6. Hydrology and Water Quality – The entire project site lies within stream basins that drain into Napa County to Lake Berryessa. Surface water and ground water modeling should evaluate the project's potential to impact surface and groundwater resources within Napa County, including potential impacts to water quality. Approximately 3.5 miles from the project site is the Berryessa Estates Subdivision which sources potable water from Putah Creek just downstream from its confluence with Butts Creek, both of which drain the project site. The EIR should evaluate the project's potential to impact was quality and quantity at the Berryessa Estates Subdivision.

7. Land Use and Planning – Any project improvements or uses occurring within Napa County, including subdivision of any legal lots of record lying within both Lake and Napa Counties, is subject to the Napa County jurisdiction. For project features within Napa County, the EIR should evaluate the project consistency with all applicable Napa County General Plan land use policies and supporting regulations.

8. Noise – The location of outdoor amphitheater and areas intended for amplified music not shown in the NOP's site plan. The EIR should analyze potential noise impacts to impact sensitive noise receptors in Napa County, including wildlife.

9. Population and Housing – The EIR should evaluate the project's potential to induce housing and other growth within Napa County.

10. Public Services – The EIR should evaluate the project's potential to affect public services provided by Napa County.

11. Transportation – The EIR should evaluate the project's potential to result in significant traffic impacts within Napa County, both in terms of project-specific impacts and the project's contribution to cumulative impacts. With Napa County, the project is likely to result in increases in traffic generation on Butts Canyon Road including the street network within Pope Valley that feeds into Butts Canyon Road, and on State Route 29 including the street network feeding into State Route 29 in the vicinity of Calistoga. Traffic modeling within Napa County should rely on the regionally-compliant Solano-Napa Travel Demand Model.

12. Utilities and Service Systems – The EIR Should evaluate the project's potential to affect utilities within Napa County, including identification of any improvements to utility systems within Napa County. Please identify how natural gas will be provided to the project.

13. Wildfire – The EIR should evaluate the project's potential to impact Napa County's emergency response operations. The Initial Study notes that Lake County's emergency operations and local hazard mitigation plans were recently updated, and finds that the project will not impair implementation of those plans. Given the large scale of this project, and its generally remote location, Napa County urges reconsideration of this conclusion. Both the emergency operations plan and local hazards mitigation plan are likely impacted by a project of this scale at this location. As you aware, significant portions of the subject property burned in the Butts Fire (2018) and the Valley Fire (2014). The scale of the Valley Fire overwhelmed Lake County's emergency response capabilities. Hundreds of Lake County residents were sheltered at the Calistoga Fairgrounds beyond capacity, and resulting in Napa County declaring an emergency in response to the refugee crisis. The fairgrounds would not have been able to handle more refugees had this development already existed.

14. Wildfire - Page 13 of the NOP states that a fire management plan is being developed that will include strategic fire breaks and other management measures. The EIR should address whether any of those measures will be located within Napa County, or result in changes to the physical environment in Napa County.

The intent of these comments is to outline the sufficiency of the environmental review document in identifying and analyzing the possible impacts to Napa County, and the ability Napa County to utilize the document in reviewing and issuing any associated permits necessary for project implementation.

Napa County thanks you for providing an opportunity to review and comment on the NOP, and eventually the Draft EIR. Please add my contact information to the mailing/email list for future noticing on this project. If you should have any questions regarding any of the items listed above, please feel free to contact me at your convenience at 707-299-1354 or john.mcdowell@countyofnapa.org.

Sincerely,

John McDowell

John McDowell
Principal Planner

Cc: Minh Tran, Napa County CEO
David Morrison, Director of Planning, Building and Environmental Services
Steve Lederer, Director of Public Works

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May 21, 2019

State Clearinghouse
State.Clearinghouse@opr.ca.gov
PO Box 3044
Sacramento, CA 95812-3044

CEQA Project: **SCH# 2019049134**
Lead Agency: **County of Lake – Community Development Department**
Project Title: **Guenoc Valley Mixed-Use Planned Development Project**

The Division of Oil, Gas, and Geothermal Resources (Division) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. Our regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. Northern California is known for its geothermal energy fields, and as such, division staff have reviewed the above referenced documents depicting the proposed project. A Notice of Preparation of an Environmental Impact Report for the proposed Guenoc Valley Mixed-Use Planned Development Project has been submitted to The County of Lake – Community Development Department. The purpose of this project is to develop a master planned mixed-use resort and residential community within the 16,000-acre Guenoc Valley Ranch property. The project requires an amendment to the General Plan and Special Study Area, a Zoning Ordinance amendment, a land use rezoning, Tentative Subdivisions Maps, a General Plan of Development, a Development Agreement, and Environmental Impact Report, Grading permits, and a Tentative Subdivision Map for off-site workforce housing.

Division staff have reviewed the documents describing the proposed project area. Approximately twenty-three known plugged and abandoned shallow geothermal temperature gradient wells are located within the proposed project area. The Well Location Map below shows these plugged and abandoned wells. A final letter was issued indicating these shallow temperature gradient wells were abandoned to standard at that time. As these were shallow temperature gradient wells, a 1" to 1 ½" pipe was installed in the well to measure temperatures. Abandonment included the placing of a surface plug in the well bore and restoration of the well location. The

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twenty-three wells, in no particular order, are referred to as the "**GR" 19, API#: 03390309, "GR" 14, API#: 03390270, "GR" 23, API#: 03390313, "GR" 20, API#: 03390310, "GR" 24, API#: 03390314, "GR" 12, API#: 03390269, "GR" 46, API#: 03390335, "GR" 26, API#: 03390316, "GR" 30, API#: 03390319, "GR" 26, API#: 03390316, "GR" 43, API#: 03390332, "GR" 44, API#: 03390333, "GR" 10, API#: 03390267, "GR" 8, API#: 03390265, "GR" 41, API#: 03390544, "GR" 40, API#: 03390329, "GR" 9, API#: 03390266, "GR" 31, API#: 03390320, "71" 31, API#: 055900708, "GR" 36, API#: 03390325, "GR" 6, API#: 03390264, "GR" 2, API#: 03390262, and "GR" 1, API#03390261.**

The Division has conducted a records and map review within the proposed project boundary but not an on-site evaluation of any known geothermal wells located within the project boundary.

For future reference, you can review geothermal wells located on private and public land at the Division's website: https://www.conservation.ca.gov/dog/geothermal/geosteam.

The local permitting agencies and property owner should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil and gas, or geothermal wells. These issues are non-exhaustively identified in the following comments and are provided by the Division for consideration by the local permitting agency, in conjunction with the property owner and/or developer, on a parcel-by-parcel or well-by-well basis. As stated above, the Division provides the above well review information solely to facilitate decisions made by the local permitting agency regarding potential development near a geothermal well.

1. If, during the development of this proposed project, **any unknown geothermal well(s) is/are discovered**, the Division should be notified immediately so that the newly-discovered well(s) can be incorporated into the records and investigated. The Division recommends that any wells found during this project, and any pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property. This is to ensure that present and future property owners are aware of (1) the wells located on the property, and (2) potentially significant issues associated with any improvements near geothermal wells.
2. No well work may be performed on any low or high temperature geothermal well without written approval from the Division in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: The Division regulates the depth of any well below

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final grade (depth below the surface of the ground). Title 14, section 1981 of the California Code of Regulations states that all well casings shall be cut off at least 6 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this grade regulation, a permit from the Division is required before work can start.)

Sincerely,

DocuSigned by:
Charlene L Wardlow
067E7ED5EA114A7...
Charlene L Wardlow
Northern District Deputy

Attachment: Project Map

cc: Mark Roberts
guenocvalleycomments@lakecountyca.gov

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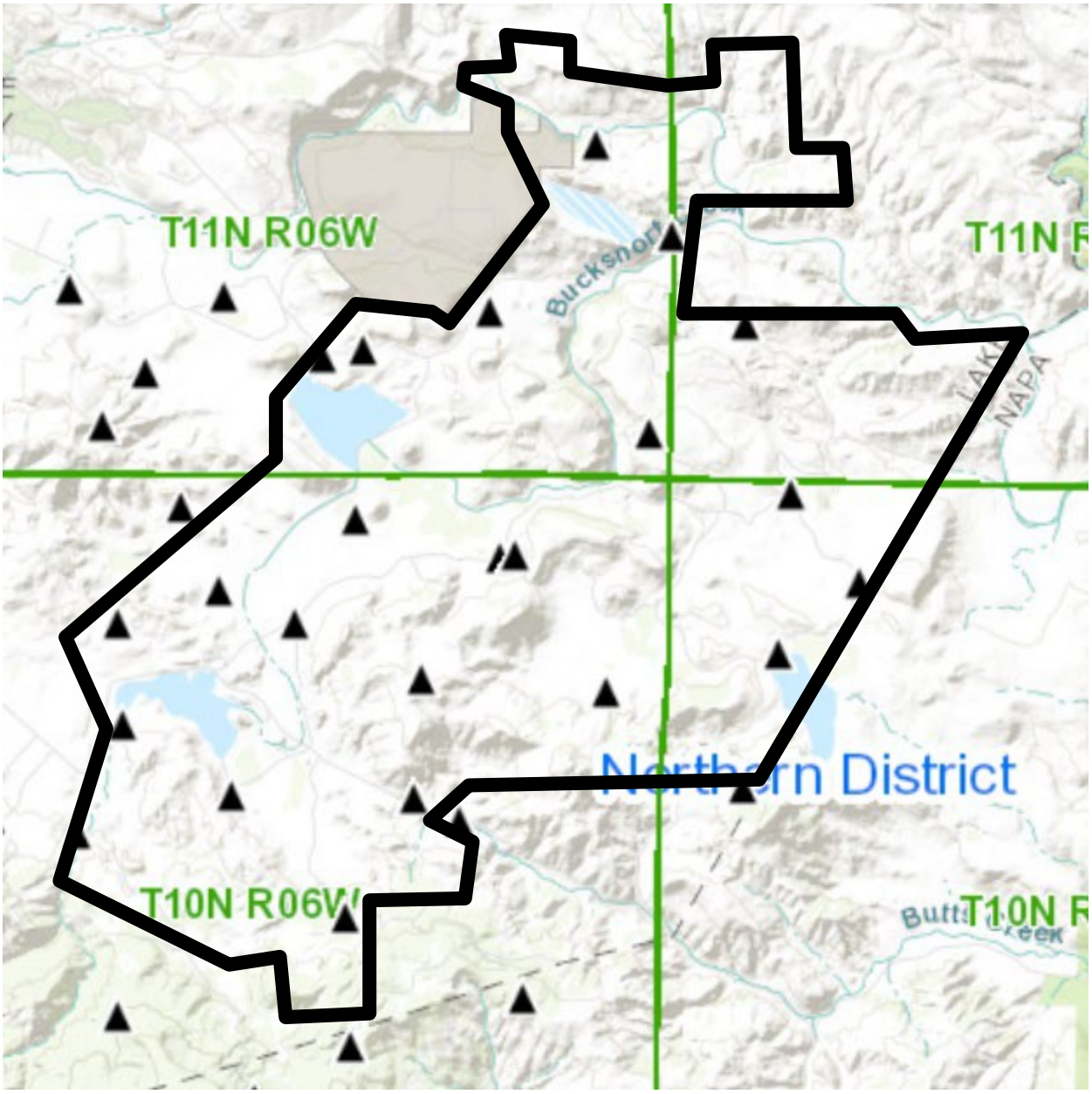
Project Boundaries are approximate.



[sent 05/22/2019, sent from the e-mail Sheri.Miller@waterboards.ca.gov]

The State Water Resources Control Board, Division of Drinking Water offers the following comment regarding the proposed "Guenoc Valley Mixed-Use Planned Development Project:

The proposed project requires a domestic water supply permit from the State Water Board prior to delivering water for public use. As the proposal will create a new public water system, the applicant will need to comply with the California Health and Safety Code which requires the applicant submit a preliminary technical report no later than seven days after submission of an application to the county for a building permit for any water-related improvement. If the report is approved by the State Water Board, the applicant can then apply for a water supply permit. For the preliminary technical report, the applicant will need to communicate with the County's Local Area Formation Commission and request water service from all public water systems within a three-mile radius to determine if water service can be provided from an already existing utility.

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Permits.html

Sheri Miller, P.E.

Mendocino District Engineer

Division of Drinking Water

State Water Resources Control Board

50 D Street, Suite 200

Santa Rosa, CA 95404

707-576-2734 desk

707-576-2145 office

707-974-8004 cell

Mark Roberts

From: Lori Baca
Sent: Friday, May 17, 2019 4:09 PM
To: Mark Roberts
Subject: RE: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Attachments: CapAnalysisPolicy_001.pdf

Mark,

The proposed project site at 22000 Butts Canyon Road is outside any Special District service areas, no impact.

However, the proposed Off-Site Workforce Housing site at 21000 Santa Clara Road/ APN 014-380-09 in Middletown is within our Assessment District 2-2 LACOSAN Middletown Sewer service are. It is within Floodway Fringe and has not been assessed for sewer service.

Projects of four single family dwelling equivalent units or greater will require the submittal of a Capacity Analysis/Hydraulic Model Policy. The analysis is to be prepared by a licensed civil engineer and will be reviewed and approved by the District. Please see the attached Capacity Analysis/Hydraulic Model Policy for your review.

Also, before the issuance of any building permits, Capacity Expansion fees as well as Buy-In fees per single family equivalent will be due and paid to the District. Current fees are listed below:

Buy-In Fee per SFD equivalent is $1,974.70

Capacity Expansion Fee per SFD equivalent is currently $5,229.94

(50% of the Capacity Expansion fee is due for units 720 square feet or less)

The Capacity Expansion Fee increases by the Consumer Price Index at the beginning of every calendar year.

****Connections to LACOSAN will be made in accordance with the rules, regulations, policies, and procedures and ordinances in effect at the time of application****

If you have any questions please do not hesitate to call me.

Lori A. Baca, CTA
Customer Service Coordinator
Lori.Baca@lakecountyca.gov
Office Number (707) 263-0119
Fax (707) 263-3836

COUNTY OF LAKE
SPECIAL DISTRICTS ADMINISTRATION
230 N. Main Street
Lakeport, California 95453
Telephone 707/263-0119
Fax 707/263-3836

Jan Coppinger
Special Districts Administrator

CAPACITY ANALYSIS/HYDRAULIC MODEL POLICY

Special Districts maintains four wastewater treatment facilities and five water systems. Each system is unique so far as when it was constructed, treatment methods and available capacity to serve new development.

The District requires that developers wishing to construct four single-family equivalent units or more, submit a capacity analysis to the District for review. Please note that in the area served by the **Southeast Regional Wastewater and Northwest Regional Treatment Facilities, the number of proposed single-family dwelling equivalent units that require the submittal of an analysis, is twenty.** The analysis is to be prepared by a licensed civil engineer and will examine water distribution, storage and treatment as well as sewer collection, pumping and treatment as is applicable to the project area. The purpose of the analysis is to identify deficiencies, (if any) in the system(s) from the project site to the treatment plant(s).

The developer will be required to reimburse the District for hours billed by Department of Public Works engineering staff and/or the District's engineering consultant for review of the Capacity Analysis. The developer will also be required to mitigate impacts to the collection and/or distribution system(s) specifically attributable to the project and as identified in the approved Capacity Analysis. Once approved, A Capacity Analysis shall remain in effect and valid for a period not to exceed two (2) years, unless an extension is granted by the Administrator.

Please note that for development in the area served by LACOSAN from Lower Lake to Clearlake Park, as well as from Beach Street to Paradise Valley, hydraulic models are available. The developer provides a project description, the information from which is "plugged into" the model and an analysis is provided to the developer for a fee. (revised 7/2/09)

Connections to all District maintained water and/or sewer systems will be made in accordance with the rules, regulations, policies, procedures and ordinances in effect at the time of connection application.

Jan Coppinger — 8-22-18

Special Districts Administrator — Date

s/Mark Dellinger 12/10/03 r 7/27/05 r 8/12/05 r 3/23/10 Res. No. 2010-60 r 5/25/11 r 8/22/18 s/Jan Coppinger.

COUNTY OF LAKE
PUBLIC WORKS DEPARTMENT
Courthouse - 255 N. Forbes Street
Lakeport, California 95453
Telephone 707/263-2341
Fax 707/263/7748

Scott De Leon
Public Works Director

May 17, 2019

Ms. Michalyn DelValle
Community Development Department Director
255 N. Forbes Street
Lakeport, CA 95453

Subject: Notice of Preparation of an Environmental Impact Report for the proposed Guenoc Valley Mixed-Use Planned Development Project

Dear Ms. DelValle,

Thank you for the opportunity to review and comment on the Notice of Preparation for an Environmental Impact Report for the Guenoc Valley Mixed-Use Planned Development Project. The proposed project consists of the development of a master planned mixed-use resort and residential community within the 16,000-acre Guenoc Valley Ranch property near Middletown and an off-site workforce housing in central Middletown. Access to the site is provided by SR 29 via Butts Canyon Road, a County Maintained Road. The off-site workforce housing is provided by SR 175 via Santa Clara Road, also a County Maintained Road.

The Lake County Department of Public Works is a responsible agency on this project and has the following comments:

1. Please include a traffic impact analysis that will show how the proposed project will impact the safety, capacity and maintenance of Butts Canyon Road and Santa Clara Road. There are three short segments along Butts Canyon Road where, due to either horizontal alignment issues and/or lack of adequate recovery areas, the collision rates exceed the average collision rates for similar facilities statewide. Please contact this Department for the specific locations.

2. Consider non-regulatory traffic control measures including roundabouts and other traffic calming measures along Butts Canyon Road at project access points rather than regulatory signs and/or traffic signals.

3. Include a walkability analysis for the off-site workforce housing facility to identify improvements needed for residents of the workforce housing to safely walk or bike to businesses and schools within the Middletown area.

4. In consideration of any future development, no additional surface runoff is allowed to be discharged into county drainage facilities.

5. Improvement plans and a cost estimate prepared by a registered Civil Engineer will be required for construction of any road improvements within the existing County right of way or proposed public right of way. A signed Inspection Agreement and a deposit of 2% of the engineers cost estimate will need to be submitted to the Department of Public Works prior to plan review.

Please continue to keep us informed of this project as it progresses. If you have any questions please do not hesitate to contact me at the number above.

Sincerely,

Scott De Leon, Director

SD:tm

DEPARTMENT OF TRANSPORTATION
DISTRICT 1, P.O. BOX 3700
PHONE (707) 441-4693
FAX (707) 445-6314
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

May 23, 2019

1-LAK-29-6.36
Guenoc Valley Mixed-Use NOP

Ms. Michalyn DelValle, Director
Community Development Department
County of Lake
255 N. Forbes Street
Lakeport, CA 95453

Dear Ms. DelValle:

Thank you for giving us the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed Guenoc Valley Mixed-Use Planned Development Project. The proposed development consists of a master planned mixed-use resort and residential community within the 16,000-acre Guenoc Valley Ranch property. The luxury destination resort consists of five hotels with up to 400 rooms/units, and up to 450 fractional ownership units, 1400 residential estate villas, 500 workforce housing units, recreational facilities, agricultural facilities and accessory uses. Workforce housing for employees is proposed to be located off-site at 21000 Santa Clara Road in Middletown. The primary access to the Guenoc Valley Ranch is from State Route 29 via Butts Canyon Road with a secondary access at Grange Road. We have the following comments:

- The Notice of Preparation for the project EIR states that the County will prepare a Traffic Impact Analysis (TIA) for the proposed project, which will address the potential impacts to surrounding roadways and include an evaluation of bicycle travel, pedestrian travel, and emergency access. We request that the TIA include the intersection of State Route 29 with Grange Road, Butts Canyon Road, Wardlaw Street, and State Route 175 among the surrounding roadways analyzed.

- The Traffic Impact Analysis is proposed to include an analysis of "overall Vehicle Miles Traveled" (VMT). If the County has not already established a threshold of significance for VMT, it is unclear whether any impacts can or will be identified. The State has set a target of reducing VMT Statewide by 15%. We recommend that the traffic analysis evaluate VMT per capita for the region (Lake County or Middletown, if data is available) as well as VMT (per capita) generated by the development. If the project does not help to achieve the Statewide goal of a 15% VMT reduction, we recommend that the resort provide mitigation that will help to reduce project VMT. Potential mitigation could include offering a shuttle service for employees and guests, electric vehicle parking for visitors and electric service vehicles, rental or loaner bikes, and robust pedestrian amenities.

- Any work performed within Caltrans right of way, including intersection improvements or surveying and traffic studies, requires an approved Caltrans Encroachment Permit. Prior to permit application submittal, the applicant is required to attend a pre-submittal meeting with the Caltrans Encroachment Permits staff in Ukiah. For more information or to request an encroachment permit, please contact Amber McCall or Jim Shupe at the Ukiah Permits Office at 707-463-4743. For future reference, the Caltrans Encroachment Permit is available online at: <http://www.dot.ca.gov/trafficops/ep/manual.html>.

Feel free to contact Rex Jackman at (707) 445-6412 or myself, at (707) 441-4693 with questions or for further assistance.

Sincerely,

JESSE ROBERTSON
Transportation Planning
District 1 Caltrans

e-copy: Amber McCall, Caltrans Encroachment Permits (Ukiah)
Jim Shupe, Caltrans Encroachment Permits (Ukiah)

Byron Turner

From: Robinson, Talmadge (Tal)@Wildlife <Talmadge.Robinson@Wildlife.ca.gov>
Sent: Monday, May 6, 2019 11:43 AM
To: Guenocvalleycomments - Email
Cc: Wildlife R2 CEQA
Subject: Guenoc Valley Mixed-Use Planned Development Project CEQA Review

Ms. DelValle,

After review of the Initial Study Checklist, my only comment is that I will be the primary contact at CDFW for this project for CEQA review and Lake and Streambed Alteration agreements (until further notice). If you have any questions as the EIR is written or as the project has a need for agreements per Fish and Game Code 1602 et seq., please do not hesitate to contact my office for assistance.

Thanks,

Talmadge (Tal) Robinson, CWB

DEPARTMENT OF FISH AND WILDLIFE
HABITAT CONSERVATION PROGRAM
BUTTE – LAKE – SIERRA
1701 Nimbus Road
Rancho Cordova, CA 95670
(916) 358-4035 (m)
talmadge.robinson@wildlife.ca.gov

CALIFORNIA
Water Boards

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MAY 20 2019

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT.

GAVIN NEWSOM
GOVERNOR

JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

16 May 2019

Michalyn DelValle
Lake County
255 North Forbes Street
Lakeport, CA 95453

CERTIFIED MAIL
7017 2620 0001 1359 2264

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, GUENOC VALLEY MIXED-USE PLANNED DEVELOPMENT PROJECT, SCH#2019049134, LAKE COUNTY

Pursuant to the State Clearinghouse's 23 April 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Guenoc Valley Mixed-Use Planned Development Project, located in Lake County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically

as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

> *Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*
>
> *This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities

(Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit
Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

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[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Waste Discharge Requirements – Discharges to Land
Pursuant to the State Board's Onsite Wastewater Treatment Systems Policy, the regulation of the septic system may be regulated under the local agency's management program.

For more information on waste discharges to land, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_land/index.shtml

Dewatering Permit
If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture
If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.
There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring

and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/ or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.

2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100**. Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 11-100 acres are currently $1,277 + $8.53/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order.

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4812 or Jordan.Hensley@waterboards.ca.gov.

Jordan Hensley
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

LAFCO Comment
6/19/19

COUNTY OF LAKE
COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division
Courthouse - 255 N. Forbes Street
Lakeport, California 95453
Telephone 707/263-2221 FAX 707/263-2225

DISTRIBUTION DATE: June 4, 2019

REQUEST FOR REVIEW
FOR SUFFICIENCY

@ AG. COMMISSIONER
@ AIR QUALITY MGMT
☒ ARMY CORPS
☒ ASSESSOR
☒ BLM
@ BUILDING DIVISION
@ CAL FIRE
@ CALTRANS
@ FIRE DIST: South Lake
@ CRWQCB
@ CA FISH & WILDLIFE
@ DPW ROADS

@ ENVIRONMENTAL HEALTH DEPARTMENT

☐ NATIVE AM. HERITAGE
☐ NRCS
☐ OFFICE OF EDUCATION
☒ PG&E
☒ PUBLIC SERVICES
@ SHERIFF
@ SONOMA STATE
@ SPECIAL DISTRICTS
☒ STATE DEPT. HEALTH
@ SURVEYOR
@ TAX COLLECTOR
☒ COUNTY OF NAPA

@ **TRIBES:**
@ Big Valley Rancheria
@ Cache Creek
@ Cortina Rancheria
@ Elem Colony
@ Koi Nation
@ Middletown Rancheria
@ Robinson Rancheria
@ Scotts Valley Band of Pomo
@ Upper Lake Habematolel
@ WATER RESOURCES
☒ OTHERS
LAKE COUNTY TRANSIT
USFW

REDBUD AUDOBON
X LAFCO
CA DEPT OF CONSERVATION
MATH

FROM: Byron Turner, Principal Planner

REQUEST: Guenoc Valley Mixed Use Project, including:

- Amendment to the General Plan and Special Study Area map of the Middletown Area Plan to include the area commonly known as the college parcels (GPAP 18-01);
- Zoning Ordinance Amendment to introduce a new zoning district to allow for future uses, Guenoc Valley District ("GVD"), to implement the goals of the Special Study Area, and subsequently rezoning of the Project Site from Rural Lands, Agriculture, Rural Residential, and an Agricultural Protection Zone to GVD (AM 18-04; RZ 18-01);
- Use Permit for the Specific Plan of Development (Master Development Plan) for the first phase (UP 18-01);
- Tentative Subdivision Maps for the first phase (SD 18-01);
- General Plan of Development (GPD 18-01);
- Development Agreement (DA 18-01);
- Environmental Impact Report (EIR 18-01);
- Grading permit for Installation of water line; and
- Tentative Subdivision Map for off-site workforce housing.

APPLICANT/OWNER: Lotusland Investment Holdings

APNs: Various – see attached

LOCATION: Butts Canyon Road

ZONING: Various

GENERAL PLAN: Various

FLOOD ZONE: Portion

PROPOSAL: See Below

Description of the type of requested permit:

The Proposed Project consists of the development of a master planned mixed-use resort and residential community within the 16,000-acre Guenoc Valley Ranch property (Project Site) in southeast Lake County and off-site workforce co-housing on an approximately 12.75-acre property located in central Middletown (Off-Site Workforce Housing Site). The Project Site is comprised of 49 parcels totaling approximately 16,000 acres in southeast Lake County. The Project Site is generally bounded by Long Valley and Coyote Valley to the west, a U.S. Coast Guard LORAN station military reservation to the northwest, the Cedar Mountains to the north, and the Lake County border to the east. The Project Site is located approximately three miles east of State Route (SR) 29 and 13 miles west of SR 16. Access to the site is provided by SR 29 via Butts Canyon Road to the northwest. Butts Canyon Road bisects the southern portion of the Project Site. The project proposal consists of multiple resort properties with 175 Hotel rooms, 144 Resort Residential units, and 381 Residential Villas, along with 98 on-site workforce housing units and an additional 50 short-term stay units.

Please find project materials at the following location:
http://www.lakecountyca.gov/Government/Directory/Community_Development/Planning/GuenocValley.htm

Located at the above website are the following documents:

- Specific Plan of Development (SPOD), including complete project description and detailed site maps
- Draft Zoning Ordinance for the Guenoc Valley Zoning District (GVD)
- Existing and Proposed Land Use Designations
- List of Project Parcels

An Initial Study has been prepared for the project, in compliance with the California Environmental Quality Act. An EIR is currently being written. Please advise us if additional information is needed, which permits are required from your agency (if any), and of your environmental concerns. Additionally, please advise if your agency recommends any modifications to the project that would reduce potential environmental impacts. 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 **June 20, 2019** Please email your comments to Byron Turner at Byron.Turner@lakecountyca.gov or mail them to the address listed in the letterhead above. Additionally, please contact Byron if you need hard-copies of the site plans or subdivision maps.

COMMENTS: I have reviewed the Initial Study and related Dox and would like to know if the RWQCB and SWRCB will require a new public agency to be formed for Water and Wastewater services. If so, LAFCo will become a responsible agency. Normally for projects of this size a "Community Services District "or "Public Utility District" would be formed for public water and wastewater. Perhaps a "County Service Area" could be formed for Water and "LACOSAN" could provide the Wastewater Services. I find it very unusual that no public agency is mentioned anywhere for these services. At a minimum, the EIR should acknowledge that LAFCo may become a responsible agency should any public entity be formed to serve the development. So in the purposes of the EIR section, LAFCo should be mentioned for the formation of service districts and the EIR will be used for the

formation of or annexation to any special district. I believe the answer to my question as to whether or not a public agency is to be formed would be evaluated and determined in the environmental document and would therefore be required as a mitigation measure. Please email LAFCo a copy of the draft environmental document once completed.

As a footnote, Lake County has a Countywide CSA for Road Mainenance and the project is in the South Lake County Fire Protection District for fire and EMS. A concern would be the development may be located in a high fire hazard area.

Let me know if I can help with any service provision issues.

NAME John Benoit, LAFCO DATE 6-19-2019

LAKE COUNTY LAND TRUST

Dedicated to preserving Lake County's natural resources through education, cooperation, and preservation.

May 28, 2019

Ms. Michalyn DelValle, Director
Community Development
County of Lake
255 N. Forbes St.
Lakeport, CA 95453

Subject: Notice of Preparation of an Environmental Impact Report for the proposed Guenoc Valley Mixed Use Planned Development Project

Dear Ms. DelValle,

Thank you for the opportunity to provide input on the subject project. I apologize for the tardiness of these comments.

The proposed Guenoc Valley Project is within a major wildlife corridor connecting public and protected lands with the Mayacamas Mountains and the Berryessa Snow Mountain National Monument. The Project is within the corridor between Mt. St. Helena and the National Monument, probably the most important corridor between the Mayacamas Mountains and National Monument south of the Mendocino National Forest. The proposed development has the potential to disrupt this important connectivity.

The Mayacamas to Berryessa Landscape Connectivity Network (M2B) coordinated by the Pepperwood Reserve mapped structural and riparian connectivity. Attached is some basic information on M2B. The proposed development appears to disrupt at least two of the structural linkages. More information, including technical reports can be found on M2B by searching for "Mayacamas to Berryessa" on the databasin.org website or by contacting the Pepperwood Foundation. The link is:

https://databasin.org/galleries/8fd96e4df2f04896ae4234f5d50cf997

The Nature Conservancy (TNC) appears to have similar findings with their Omniscape Connectivity mapping, which identifies wildlife connectivity through the Guenoc properties. The results of their mapping may be viewed at:

Officers
President: Valerie Nixon
Vice Pres.: William Lincoln
Treasurer: John Stierna
Secretary: Erica Lundquist

Directors
Catherine Koehler
Roberta Lyons
Merry Jo Velasquez

Executive Director
Thomas Smythe

Operations
Anne Martin

Outreach
Melissa Kinsel

PO Box 1017
Lakeport, CA 95453
707.262.0707

LCLT@LakeCountyLandTrust.org
www.LakeCountyLandTrust.org

http://tnc.maps.arcgis.com/apps/webappviewer/index.html?id=3cbb9454372e43ffac44b9dda07b5551

The impacts of the proposed project on wildlife connectivity and wildlife corridors should be evaluated during the preparation of the Environmental Impact Report or the Guenoc Valley Mixed-Use Planned Development Project.

If you have any questions, please contact me.

Sincerely,

Thomas R. Smythe
Executive Director

Pepperwood PRESERVE

Protecting Habitat Corridors for Climate Adaptation

Mayacamas to Berryessa Landscape Connectivity Network (M2B)

The Mayacamas to Berryessa Landscape Connectivity Network (M2B) is a public-private collaboration between land trusts, open space and park districts, State and Federal land managers, and ecology researchers committed to assessing the landscape-level conservation needs of Northern California's Inner Coast Ranges. The goal is to co-create practical conservation strategies for addressing biodiversity and watershed health while protecting resiliency of these habitats in the face of climate change, drought and fire. Pepperwood serves as the team's backbone organization and facilitated team activities including habitat mapping, landscape linkage analyses, and climate threat assessments to build a habitat connectivity roadmap across Sonoma, Napa and Lake Counties. This landscape-level vision spans from the Mayacamas Mountains to the new Snow Mountain-Berryessa National Monument and identified priority locations for habitat corridor projects. The site-specific habitat corridor reports generated by the M2B network identify specific parcels for conservation and the resulting climate adaptation benefits. The resulting data products can be used by network partnership to support funding and implementation needs for corridor protection and enhancement.

Why habitat connectivity? Keeping landscapes connected via habitat linkages or corridors is the most frequently recommended approach to maintain ecosystem resilience in the face of climate change as it provides an "escape route" for plants and animals to relocate when their habitats are no longer viable due to climate or other changes. Linking also allows resources to pass between habitats that are increasingly confined by human development.

Approach: The M2B Network relies on the collaboration of diverse stakeholders to both acknowledge and anticipate the environmental needs of this region. Network scientists and land managers are developing habitat corridor plans based on the following assessments.

- Identification of potential habitat linkages based on terrestrial and riparian connectivity of natural habitats between existing protected areas
- Quantification of habitat corridor climate benefits by estimating the ability of species to escape rising temperatures via movement corridors, based on state-of-the art, high- resolution climate projections
- Generation of maps to compare the vulnerability of specific sites to fire, drought, and other environmental concerns with their contribution to the overall ecological health of the region, which will help guide priorities for land and easement acquisition and habitat restoration

Communications and Outreach: The M2B network created a standardized vocabulary for communicating key science concepts to public and private landowners about the climate adaptation value of keeping natural and working landscapes connected. This vocabulary and basic messaging materials will support a consistent outreach effort via diverse partners across the region, including local Resource Conservation Districts and extension agents.

Key Research Findings: The M2B network relies upon scientific research to design and implement habitat assessment tools. A technical *M2B Methodology Report* (Gray et al. 2018) describes the innovative scientific methods supporting our work, and is supplemented by six site-specific habitat corridor reports that illustrate how terrestrial, riparian, and climate connectivity can be used – in combination or independently – to identify locations of conservation value that provide connectivity benefits today and under scenarios of landscape change. Among our major findings was the importance of accounting for seasonality in Mediterranean climates with a coastal influence. Because the effects of climate change will likely differ by season and location, it is important to consider

the seasonal needs of wildlife across the landscape when planning for connectivity. Our research is integrated into a database that is shared by partners and visible to the public via Data Basin (databasin.org)

Key Conservation & Land Management Findings: By directly involving stakeholders in the modeling process and evaluation of results, we ensure that users can use the data and maps we have acquired to inform actionable local and regional strategies. The combination of high-resolution landscape permeability and climate datasets provides local decision-makers with flexible science-based tools for exploring, planning, and implementing habitat connectivity pathways. In the M2B region, parcel-scale acquisition and stewardship will be advanced primarily by private land trusts and public open space districts in concert with State and Federal land management agencies.

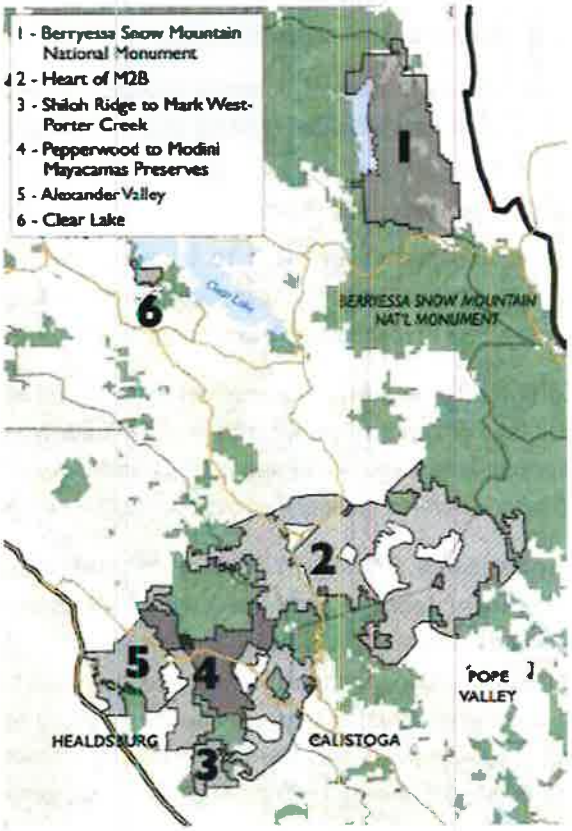
A Model for California and Beyond: Successful climate change adaptation requires building social and physical landscape linkage networks and cultivating a shared understanding of how land use and climate change will influence future connectivity. Our analytical results are designed to be scalable and reproducible throughout California. The formation of the M2B network provides a documented model for empowering local agencies and organizations to work effectively, and in a coordinated fashion, to achieve landscape-level conservation objectives.

The Mayacamas to Berryessa Steering Committee includes representation of ten leadership agencies, including Audubon Canyon Ranch, Blue Ridge Berryessa Natural Area Partnership, California Department of Fish and Wildlife, Lake County Land Trust, Land Trust of Napa County, McLaughlin Reserve, Sonoma County Agriculture + Open Space District, Sonoma County Regional Parks, Sonoma Land Trust, and the United States Bureau of Land Management.

Project support for *Building Habitat Connectivity for Climate Adaptation: Mayacamas to Berryessa Connectivity Network (M2B)* provided by the California Landscape Conservation Partnership, F16AC00574.

Contact Dr. Lisa Micheli at Pepperwood Foundation: lmicheli@pepperwoopreserve.org
https://www.pepperwoodpreserve.org/

Map of the M2B project area, overlaid with protected areas (green) and Berryessa Snow Mountain National Monument (hatched). A detailed map of the focal corridor region (orange) is below.



Six local corridor projects within the M2B project area identified as priority locations for climate connectivity resilience. Overlapping regions are dark gray, and the Heart of M2B corridor is hatched.

RECEIVED

MAY 16 2019

LAKE COUNTY COMMUNITY DEVELOPMENT DEPT.

COUNTY OF LAKE PUBLIC SCOPING MEETING

Guenoc Valley Mixed-Use Planned Development Project Environmental Impact Report

COMMENT FORM

(Comments Due by 5:00 PM on May 23, 2019)

Scoping meeting locations: County of Lake Board of Supervisors Chambers - 255 N. Forbes Street, Lakeport, CA and Middletown Community Room, Middletown Library - 21256 Washington Street, Middletown, CA

I would like the following topics, issues, and/or concerns to be covered in the Environmental Impact Report:

I would like to make the following statement: The location of the optional offsite well is one that will impact the Middletown Aquifer + is approximately 2 miles from a Geothermal Waste Site that has contaminants in the ground water. This plume is 75 acres most outside the Fenced area. There is a plume headed toward Middletown approx 2000' long 300' wide + 30-50 feet deep. The proposed well will create a cone of depression that will draw water to try + fill the depression then piped to another aquifer that already has its level of water will create a push. So the depression will create a pull + piping will create a push of →

(If you need additional room, please use reverse side)

Name: Wana Dicht-Darms Phone Number: (707) 355-4747

Affiliation: Middletown Community Member

Address: PO Box 180, Middletown, CA 95461-0180

E-mail address: pinkywink05@gmail.com

Would you like your name to be added to the mailing list for this project? If you are on the mailing list you will receive notification of public meetings and notice of publication of environmental documents.

X YES ___ NO

NOTE: Please give this comment to meeting attendant or mail to the County of Lake, Community Development Department: c/o Byron Turner, Principal Planner, 225 N. Forbes Street, Lakeport, CA 95453. On the envelope, please include your name, return address, and the caption: Scoping Comment, Guenoc Valley EIR

water. Like a circulating pump. This leads to the very real possibility of moving the plume down toward private wells. Then eventually in the Middletown aquifer. The waste is more than drilling mud, although that is what is documented. The owner of that site prior to being closed, were accepting waste that should have been trucked to Benecia hazardous waste site. There are people who live here that worked there during the time & people who were impacted by contact with this waste.

To those making the decison as to whether to accept the location of this optional well, are you willing to take ~~[illegible]~~ responsibility that your decision if it is to accept this option could negatively impact the health & wellbeing of our community. Also, ask yourself if you would be comfortable having yourself or a loved one live down from a plume of contaminants that has the real possibility of moving because of the volume of water that would be pulled out.

[sent May 21st, 2019]

To whom this may concern:

After reading the proposed EIR for the Guenoc Valley Development Project, I have deep reservations that the report does not address the Dark Skies Initiative in Lake County. Especially in light of the Board of Supervisors' approval of the Dark Sky Proclamation last November; this issue needs to be considered as part of the EIR. This development may be an overall plus for Lake County, but only if care is taken to have as little impact on the environment as possible, and maintain the night beauty we all hold valuable. Mitigation measures to alleviate light pollution should be taken to keep the light down at night such as: the use of downward facing lighting fixtures, dark-sky friendly light bulbs, limit night sky traffic, and an absolute minimal night lighting when all is closed for the evening etc.

Being able to see the stars at night is a big part of what makes Lake County so unique!

Thank you for the opportunity to be heard on this issue, and I hope my concerns are seriously addressed.

Sincerely,

Julie Kreis

Citizen of Lake County since 1978

[sent 05-21-2019, from the e-mail melissakinsel7@gmail.com]

Dear Michalyn,

In reading the proposed EIR for the Guenoc Valley Development Project, I am concerned that the report does not address the Dark Skies Initiative in Lake County. Especially in light of the Board of Supervisors' approval of the Dark Sky Proclamation last November, this issue needs to be considered as part of the EIR. I think the development will be an overall plus for Lake County, but only if care is taken to have as little impact on the environment as possible. Mitigation measures to alleviate light pollution should be taken to keep the light down at night, use downward facing lighting fixtures, dark-sky friendly light bulbs, limit night sky traffic, etc.

Being able to see the stars at night is a big part of makes Lake County so special!

I appreciate the opportunity to be heard on this issue.

Best,

Melissa Kinsel

707.287.7908

[sent 05-21-2019, from the e-mail 4val944@gmail.com]

Dear Michalyn,

Please include Dark Sky criteria in the permits for the Guenoc Development. Lake County has some of the most beautiful dark sky in the state. Our Board of Supervisor recognized it's value last November. In allowing for progress we must consider the intrinsic value of why so many of us love it here.

Thank you,

Val Meyer Nixon

Kelseyville

--

Val Meyer Nixon

[sent 05-22-2019, sent from the e-mail liskaplan@gmail.com]

Dear Michalyn,

I am concerned that the EIR on the Guenoc Development does not adequately address our Dark Skies proclamation for Lake County which was Board of Supervisor approved last November. this should be considered as part of the EIR.

While economic development is important to Lake County, it should have the least possible impact on the natural environment which is our most important asset and attraction. Let's carefully mitigate and limit the impact on our dark skies.

Thank you,

Lisa Kaplan
www.LisaKaplanArt.com
Art / Education / Digital Media and Design
Tel: 707-987-9095
Cell: 707-295-6663

Mark Roberts

From: JoAnn <shylila@cluemail.com>
Sent: Tuesday, May 21, 2019 5:28 PM
To: Guenocvalleycomments - Email
Subject: Comment on Guenoc Development

> Dear Michalyn,
>
> In reading the proposed EIR for the Guenoc Valley Development Project, I am concerned that the report does not address the Dark Skies Initiative in Lake County. Especially in light of the Board of Supervisors' approval of the Dark Sky Proclamation last November, this issue needs to be considered as part of the EIR. I think the development will be an overall plus for Lake County, but only if care is taken to have as little impact on the environment as possible. Mitigation measures to alleviate light pollution should be taken to keep the light down at night, use downward facing lighting fixtures, dark-sky friendly light bulbs, limit night sky traffic, etc.
>
> Being able to see the stars at night is a big part of what makes Lake County so special!
>
> I appreciate the opportunity to be heard on this issue.
>
> Kindly,

JoAnn Saccato

Sierra Club Lake Group

PO Box 415 Lower Lake, CA 95457

May 23, 2019

Michalyn DelValle
Community Development Department
Planning Division
255 N. Forbes Street
Lakeport, CA 95453
via email: guenocvalleycomments@lakecountyca.gov

RE: Scoping comments, Guenoc Valley Mixed-Use Planned Development Project

Dear Ms. DelValle:

Lake Group appreciates this opportunity to engage in discussion about the environmental impacts of this major project from the beginning. We have been involved in previous applications for development in this area for a number of years, including the 2008 Langtry Farms golf course (an application that the Sierra Club supported), and were also engaged in the Middletown Area Plan process.

Obviously a project of this magnitude has the enormous potential to impact Lake County both positively and negatively. It's therefore particularly important that all effects be subject to stringent evaluation, and every effort made to predict possible consequences. In general, we agree with the conclusions of the Initial Study regarding the scope of work needed, and will wait to comment on specific impacts and proposed mitigations when that analysis is made available in the Draft Environmental Impact Report (DEIR).

We do however have several concerns that seem worth mentioning at this time.

Land Use and Planning. The Middletown Area Plan (MAP) MAP devotes particular attention to the Guenoc Valley, which it designates as a Special Study Area with "up to 800" residential units. In contrast, the current application calls for 1400 residential units (1900 in Appendix C). We question the desirability of approving such a dramatic increase in density, not only because of direct impacts on the site, but also because of possible precedents that could affect other parts of the county. At a very minimum, compelling justification for disregarding the standards of the Area Plan should be required before considering such a variance.

In principle, we support the proposal to include workforce housing in the project, both on site and in Middletown, but question the appropriateness of constructing "co-living" facilities in 400 square-foot bedroom and bath units with "shared cooking and resting areas" rather that traditional multi-unit apartments or single family residents. To the best of our knowledge, this kind of living arrangement doesn't correspond with any residential category in either the MAP or Lake County General Plan.

The proposal to analyze the first phases of the project (covering the next 10 years) at the project level, and the remainder at the program level is fraught with problems unless the distinction between the two is made crystal clear, and the program/project analysis kept

separate to the greatest extend possible. with this approach, to succeed has to very clearly distinguish between the two categories.

Recreation. Table 1, 3.5 refers to the construction of a new golf course and also the possibility of reconstructing the existing course, which was damaged in the 2015 Valley Fire. We strongly recommend that the decision about whether to have one course or two be made as quickly as possible, and the analysis be conducted accordingly.

Table 1, 3.6 mentions a 45-acre "wilderness" area which will contain "semi permanent tents" and "off road courses." The word "wilderness" has a specific meaning in state and federal law, a meaning that doesn't allow any sort of permanent or semi-permanent structure. Although this designation doesn't apply to private lands and landholders are at liberty to call their properties anything they please, we recommend that confusion be avoided by choosing different nomenclature such as "natural recreation area" or something similar.

The project site is adjacent to BLM lands in the Berryessa Snow Mountain National Monument. It would be to the benefit of developers, hotel guests, residents and the general public to explore the possibility of collaborative recreational use.

Energy. We commend the proposal to set aside 50 acres for alternative energy production, but wonder why this part of the project can't be integrated into construction generally, by systematic installation of rooftop solar generating facilities on residences and commercial property? Inclusion of solar generation into parking lot shade structures could also do a lot to offset the project's energy consumption.

Open Space It is proposed to designate 2675 acres as permanent open space, but it's not clear what kinds of uses will be allowed in these areas. Will they include various recreational functions (eg golf course and equestrian areas?) or maintained kept as natural habitat? How are current and proposed vineyard areas calculated, and "managed grazing" areas?

Traffic. Both construction and operations are certain to have major impacts on traffic which are almost certain to extend beyond the immediate vicinity of Middletown and likely to be significant on the stretch of Highway 29 that crosses Mt St Helena. This segment appears to be at or near carrying capacity already, especially during commute hours.

The Sierra Club also concurs with the Redbud Audubon Society about the necessity of addressing both climate change and wildlife connectivity in the upcoming EIR.

Please keep us advised of any future opportunities to participate in the dialog about this project.

Sincerely,

Victoria Brandon
Conservation Chair, Sierra Club Lake Group

Redbud Audubon Society, Inc.

POB 5780 Clearlake, CA

RECEIVED

MAY 20 2019

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT

May 20, 2019

Lake County community Development Department
255 North Forbes Street
Lakeport, CA 95453

Attn: Mark Roberts, Senior Planner

As Conservation Chair for the Redbud Audubon Society I'm requesting issues to be addressed in the Environmental Impact Report (EIR) that is being prepared for the Guenoc Valley Mixed Use-Planned Development.

Issues that need to be addressed along with those already mentioned in the scoping document include Habitat Corridors to ensure wildlife habitat connectivity. This issue is becoming a major concern as more of our wildlands are being fenced and developed. Habitat connectivity for wildlife passage is a must to consider in this scoping document. This will require establishing a data base of current wildlife passages.

At the scoping meeting held on May 15 it was discussed that the residential units will be on 5 acres parcels. This is one of the worst scenarios for development to ensure habitat connectivity. Numerous fenced off five acre parcels will block wildlife passage and simply leaving it up to the residents to encourage wildlife is not adequate. Many people do not want deer in their yards. More clustered housing with larger areas of open space makes more sense. This sounds like a development of high end ranchettes which is not a conservation friendly approach to development. I'm wondering if you are familiar with the work of Christopher Duerksen who has written several books on creating Nature-friendly communities. I'm a little surprised that after seven years of work planners are still looking at ranchette style development. The developer is asking residents of Lake County to accept the creation of a new town; if we are to do so, every effort must be made to create a nature-friendly community.

I did not see any mention of Night Sky friendly development. As you know, our Lake County Board of Supervisors recently approved a Resolution in support of lighting ordinances consistent with Dark Sky Certification as a Dark Sky Community for the county. Please address this in the EIR.

Another issue is climate change. What energy use will be required and carbon dioxide releases occur not only in the building and maintaining of this project, but its continued existence. If the EIR is to go out many years, the review of Climate Change is a must; especially considering that new laws and requirements may be established as time goes on. I was at the May 15 meeting so I learned that solar energy is part of the plan, but I still want the specific issue of climate change addressed.

I have a question about the use of animals for vegetation control. This sounds like a great idea and of course is better that herbicides, but how much thought has been given to the care of these herds of animals when it comes to predators? How will the coyotes, cougars and bobcats be kept from attacking the sheep and goats? Also, grazing animals pretty much eat anything, not just what we want them to eat. Has a survey of Native California Bunch grasses been conducted? It seems that much of this territory would be conducive to this type of vegetation.

Requiring only 2,000 plus acres of guaranteed open space is a small requirement for a total acreage of 16,000 acres. Please review this as well.

Sincerely
Roberta Lyons
Conservation Chair, Redbud Audubon Society

Please continue to send all communication to: roberta.lyons@att.net.

Mark Roberts

From: Martha Mincer <mmincer@ptd.net> on behalf of martha@lcrai.org
Sent: Tuesday, May 21, 2019 2:40 PM
To: Guenocvalleycomments - Email
Cc: abby; alicia; amber; anni; conni; gillian; kim; martha; meg; tamsen
Subject: Comment on Guenoc Development

Dear Michalyn,

As with many of the people I have talked to, we at *Lake County Rural Arts Initiative* are also concerned that the EIR for the Guenoc Valley Development Project does not address the Dark Skies Initiative in Lake County. It is becoming, and will continue to become, a unique attraction for our county. There are "best practices" to mitigate light pollution that I'm sure can be found and applied.

As you may know, LCRAI is working to make/support Lake County an *art destination* that can accelerate our economic success while also preserving what we love about the county. Our hope is that all the developments will engage in supporting our genuine and amazing LC arts & culture (as it also supports their tourism or relocation goals too) as well as our other attractions like Dark Skies. Has any discussion/planning happened with the Guenoc Valley project as to this topic?

Please let me know....
Thank you

Martha

Martha Mincer
LC RAI Board Member
570 903 5011
www.lcrai.org

Middletown Rancheria
Tribal Historic Preservation Department
P.O. Box 1035
Middletown, CA 95461

May 23, 2019 Via Electronic Mail

Ms. Michalyn DelValle, Director
County of Lake
Community Development Department
255 N. Forbes Street
Lakeport, CA 95453
Via Email: Michalyn.Delvalle@lakecountyca.gov

Subject: Notice of Preperation of an Environmental Impact Report for the proposed Guenoc Valley Mixed-Use Planned Development Project
MTR THPD File No. 19-04-023

Dear Ms. DelValle:

The Middletown Rancheria ("Tribe") is in receipt of your notification dated April 23, 2019 regarding the above referenced matter. The Project site and its surrounding landscape have since time immemorial been considered a site of cultural, historical, and religious significance for the Tribe. The Tribe is aware of and concerned about significant cultural and sacred resources that, while known to the Tribe, may not be properly identified through record and survey searches. Moreover, the potential for cumulative impacts to tribal cultural resources must be adequately assessed.

Due to the high likelihood of disturbing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Tribe, during the Project, the Middletown Rancheria is requesting to be an active participant in all aspects of the Project and development of the Environmental Impact Report (EIR).

We request that all notices and documents be mailed or personally delivered to the Tribe with an electronic copy provided, as early as possible to allow the Tribe adequate time to provide information and to facilitate meaningful consultation to ensure protection and mitigation of tribal cultural resources.

This correspondence is without prejudice to any rights and remedies of the Tribe, all of which are expressly reserved.

We appreciate your time and consideration on this matter. Please contact as soon as possible to discuss next steps.

Thank you.

Larry Longee, Jr.
THPO Director
llongee@middletownrancheria.com
Cell: (707) 230-1031

CC: Tribal Council
Project File No. 19-04-023

YOCHA DEHE
CULTURAL RESOURCES

May 9, 2019

County of Lake
Community Development Dept.
Attn: Michalyn DelValle, Director
255 N. Forbes Street
Lakeport, CA 95453

RE: Guenoc Valley Mixed-Use Planned Development

Dear Ms. DelValle:

Thank you for your project notification letter dated, April 23, 2019, regarding cultural information on or near the proposed Guenoc Valley Mixed-Use Planned Development, Lake County. We appreciate your effort to contact us.

The Cultural Resources Department has reviewed the project and concluded that it is not within the aboriginal territories of the Yocha Dehe Wintun Nation. Therefore, we respectively decline any comment on this project. However based on the information provided, please defer correspondence to the following:

Middletown Rancheria
Attn: Larry Longee, THPO
PO Box 1035
Middletown, CA 95461

Please refer to identification number YD – 04232019-04 in any future correspondence with Yocha Dehe Wintun Nation concerning this project.

Thank you for providing us with this notice and the opportunity to comment.

Sincerely,

Isaac Bojorquez
Interim Director of Cultural Resources

RECEIVED
MAY 17 2019
LAKE COUNTY COMMUNITY DEVELOPMENT DEPT.

Yocha Dehe Wintun Nation
PO Box 18 Brooks, California 95606 p) 530.796.3400 f) 530.796.2143 www.yochadehe.org

From: Mary Camp
To: Mark Roberts
Subject: RE: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Date: Wednesday, April 24, 2019 2:34:26 PM

Redwood Valley thanks you for the notice. We would defer to any review, comments or concerns from Middletown Rancheria. This is a very large project and needs to be carefully studied.

From: Mark Roberts [mailto:Mark.Roberts@lakecountyca.gov]
Sent: Wednesday, April 24, 2019 12:03 PM
To: nahc@nahc.ca.gov; cww281@gmail.com; env.tech.elem@gmail.com; a.garcia@elemindiancolony.org; kkarolaepa@gmail.com; aarroyosr@hpultribe-nsn.gov; lrosas@hpultribe-nsn.gov; kn@koination.com; tc@middletownrancheria.com; jsimon@middletownrancheria.com; THPDNotices@middletownrancheria.com; btorres@middletownrancheria.com; speterson@middletownrancheria.com; admin@rvrpomo.net; drogers@robinsonrancheria.org; terre.logsdon@sv-nsn.gov; thomas.jordan@sv-nsn.gov; lbill@yochadehe-nsn.gov; rrouse@yochadehe-nsn.gov; jkinter@yochadehe-nsn.gov; aroberts@yochadehe-nsn.gov
Cc: Byron Turner <Byron.Turner@lakecountyca.gov>; Michalyn DelValle <Michalyn.DelValle@lakecountyca.gov>
Subject: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Importance: High

Hello Tribal Members,

This email is in regards to the Notice of Preparation of an Environmental Impact Report (EIR) for the proposed Guenoc Valley Mixed Use-Planned Development. The above attachment is a detailed Notice of Preparation Packet regarding the proposed use for you to review and provide the necessary comments. Please keep in mind, the commenting period is from April 23, 2019 through May 23, 2019. Please disregard the previous email sent on April 23, 2019 and use the above attachments when reviewing and commenting on the proposed project. We look forward to hearing from you. If you have any questions, please let me know.

Sincerely,

Mark Roberts – Senior Planner

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

From: Mark Roberts
Sent: Tuesday, April 23, 2019 5:53 PM
To: 'nahc@nahc.ca.gov' <nahc@nahc.ca.gov>; 'cww281@gmail.com' <cww281@gmail.com>; 'env.tech.elem@gmail.com' <env.tech.elem@gmail.com>; 'a.garcia@elemindiancolony.org' <a.garcia@elemindiancolony.org>; 'kkarolaepa@gmail.com' <kkarolaepa@gmail.com>; 'aarroyosr@hpultribe-nsn.gov' <aarroyosr@hpultribe-nsn.gov>; 'lrosas@hpultribe-nsn.gov' <lrosas@hpultribe-nsn.gov>; 'kn@koination.com' <kn@koination.com>; 'tc@middletownrancheria.com' <tc@middletownrancheria.com>; 'jsimon@middletownrancheria.com' <jsimon@middletownrancheria.com>; 'THPDNotices@middletownrancheria.com' <THPDNotices@middletownrancheria.com>; 'btorres@middletownrancheria.com' <btorres@middletownrancheria.com>; 'speterson@middletownrancheria.com' <speterson@middletownrancheria.com>; 'admin@rvrpomo.net' <admin@rvrpomo.net>; 'drogers@robinsonrancheria.org' <drogers@robinsonrancheria.org>; 'terre.logsdon@sv-nsn.gov' <terre.logsdon@sv-nsn.gov>; 'thomas.jordan@sv-nsn.gov' <thomas.jordan@sv-nsn.gov>; 'lbill@yochadehe-nsn.gov' <lbill@yochadehe-nsn.gov>; 'rrouse@yochadehe-nsn.gov' <rrouse@yochadehe-nsn.gov>; 'jkinter@yochadehe-nsn.gov' <jkinter@yochadehe-nsn.gov>; 'aroberts@yochadehe-nsn.gov' <aroberts@yochadehe-nsn.gov>
Cc: Michalyn DelValle <Michalyn.DelValle@lakecountyca.gov>; Byron Turner <Byron.Turner@lakecountyca.gov>
Subject: Notice of Preparation of an EIR for the proposed Guenoc Valley Mixed Use-Planned Development
Importance: High

Hello Tribal Members,

This email is in regards to the Notice of Preparation of an Environmental Impact Report (EIR) for the proposed Guenoc Valley Mixed Use-Planned Development. The above attachment is a detailed Notice of Preparation Packet regarding the proposed use for you to review and provide the necessary comments. Please keep in mind, the commenting period is from April 23, 2019 through May 23, 2019. If you have any questions, please let me know.

Sincerely,

Mark Roberts – Senior Planner

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