

Hi Jeffrey,

Thanks so much for staying on top of the application for us and the timely, valuable feedback. We'll have amended applications to you ASAP with all comments addressed.

The Benmore Ranch is a large, diverse, operational ag ranch that has been commercially operated for over 3 decades. We had 240 acres planted, 11 wind machines powered by Propane powered Ford V8s running at once at 2AM for frost protection, 2 Volvo diesel V8s running pumps, trucks coming in and out all day for harvest, crew of 30 workers there for pruning, 3 families with a total of about 15 people living on site working the vineyard, and the ranch manager coming and going a few times/week. The last year I ran the vineyard, Korbel purchased the grapes and made around 300,000 bottle of wine.

Now we are proposing 5 acres of outdoor cultivation with a crew of 4 on a 240 acre valley floor in the footprint of the vineyard. That would mean we are planting around 2% of the previously planted land. The idea that we need to do an Initial Study is not credible. It sounds like an "emperor wears no cloths" situation. I appreciate that the County needs to be prudent in assuming all commercial cannabis operations may need and IS, but I do not think many have the history of consistent ag use and the infrastructure for large scale cultivation operations.

For the greenhouses, thanks for the clarification that the permit fees were not an error. Based on decades of permitting experience in Lake County, both Cliff and Richard thought the planner had misplaced a decimal point and that requiring \$425,000 fee to construct 88 cold frames for frost protection was not customary for such construction in Lake County. That said, we plan to pay any required fees and work out the reduced plan check fee with Mary Jane. I'm glad she was able to acknowledge that \$162,000 was not a reasonable fee to plan check a cold frame greenhouse.

On the attached invoice from CDD there is a valuation of \$8,736,014.00 assigned to the permit. Can you clarify what that pertains to? The 88 structures we proposed cost around \$9k each and are temporary structures - no foundation, no electricity/plumbing, no solid walls, built on grade. They add no value to the property and the lease requires they be removed when cultivation ceases. Basically, a metal frame with a piece of cloth over it to protect from frost for an outdoor crop. We are allowed an non-discretionary permit to build them with an ag exemption. Please see the attached memo on the subject. I submitted the memo a few weeks ago and Mireya emailed me that Bob had it referred it to County Council for review. I have not heard back and would appreciate an answer in writing. Anita should call Brad if she has questions.

Thanks,

Rob

On 4/23/2018 3:18 PM, Jeffrey Taylor wrote:  
> Annje,

>  
> At this point no determination has been made whether or not an Initial  
Study will be required.  
> As such, we are trying to anticipate what would be required if it were  
necessary. With that said, at  
> this point we are being advised that we should treat all commercial  
cannabis applications as needing an  
> IS until otherwise determined.  
>  
> Thanks,  
>  
> Jeff  
>  
> -----Original Message-----  
> From: Annje Dodd [mailto:adodd@housemoran.com]  
> Sent: Monday, April 23, 2018 3:03 PM  
> To: Jeffrey Taylor <Jeffrey.Taylor@lakecountyca.gov>; Robert Adelman  
<rob@metalogosinc.com>  
> Subject: RE: email follow up  
>  
> Jeffrey,  
>  
> It looks like most of the comments you have pertains to discussion required  
as part of CEQA. Since the  
> proposed project falls under existing facilities and minor modifications,  
the project is exempt from CEQA.  
> Thus, an initial study is not required.  
>  
> Could you please clarify?  
> Annje  
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