

Footnote / Figure	Description	Disposition	Document/Link
[A1]	CEQA Guidelines §§15126.2(a), 15064(f)(5)	No – statute	
[A2]	Sundstrom v. County of Mendocino (1988)	No – case law	
[A3]	Friends of B Street; San Joaquin Raptor Rescue Center	No – case law	
[A4]	PRC §21168.5; Western States Petroleum; Clark v. Hermosa Beach	No – statute/case law	
Figure 1	Federal lands map relative to site	Yes – Include in this chapter	https://www.blm.gov/programs/national-conservation-lands/california/berryessa-snow-mountain-national-monument PDF file of site included.
[B1]	BLM jurisdiction over Snow Mountain Monument	Yes – Include in this chapter	https://www.blm.gov/programs/national-conservation-lands/california/berryessa-snow-mountain-national-monument 01 Berryessa Snow Mountain National Monument _ Bureau of Land Management
[B2]	Veh. Code §21101 vs	No – statute	

	43 CFR §2808.10		
[B3]	FLPMA ROW requirements	No – statute	
[B4]	BLM correspondence denying authorization	Yes – Include in this chapter	04 (UP 23-09) BLM Letter Poverty Flats.pdf
[B5]	Federal trespass penalties statutes	No – statute	
[B6]	Mills v. United States (IBLA 2006)	No – case law	
[B7]	Clouser v. Espy (9th Cir. 1994)	No – case law	
[B8]	United States v. Vogler (9th Cir. 1988)	No – case law	
[B9]	Adams v. United States (1993)	No – case law	
[B10]	Sierra Club v. Hodel (10th Cir. 1988)	No – case law	

[B11]	Friends of B Street; San Joaquin Raptor Rescue	No – case law	
Figure 2	BLM letter to CDD re: access prohibition	Yes – Include in this chapter	04 (UP 23-09) BLM Letter Poverty Flats.pdf
[C1]	18 U.S.C. §§2, 371 (aiding/con spiracy)	No – statute	
[C2]	PRC §21168.5; Friends of B Street; San Joaquin Raptor	No – statute/case law	
[C3]	18 U.S.C. §1856; 21 U.S.C. §844	No – statute	
[C4]	United States v. Feola (1975)	No – case law	
[C5]	City of Santa Barbara v. Superior Court (2007)	No – case law	
[C6]	PRC §21168.5	No – statute	
[C7]	RICO statute 18	No – statute	

	U.S.C. §1962		
Figure 3	Table of projects approved without lawful access	Yes – Include in this chapter	03 Table of projects approved without lawful access.pdf
[D1]	City of Santa Barbara v. Superior Court (2007)	No – case law	
[D2]	IA language re: federal illegality	Yes – Include in this chapter	05 Indemnification Agreement for Poverty Flats.pdf
[D3]	Record of repeated IA use since 2020	Yes – Include in this chapter	03 Table of projects approved without lawful access.pdf 09 (UP 21-49) BLM Letter Cody Leck Nov 16 2024.pdf 11 2020-06-12 Benmore BLM Letter.pdf 13 BLM CUA Enterprises(Up19-40) November 4, 2020.pdf 14 BLM Response Letter (UP 21-49) November 16 2024.pdf 15 Indemnification Agreement Liu Farms specific to cannabis.pdf 16 Minutes for BG Enterprises August 24 2021.pdf item 9:19 17 Minutes for CUA and Badlands April 08 2021.pdf -item at 9:18am,

[D4]	Sundstrom v. County of Mendocino	No – case law	
[D5]	Minutes of PC hearing April 22, 2025	Yes – Include in this chapter	18 Minutes for CUA and Badlands April 22 2021.pdf
[D6]	Minutes of PC hearing April 08, 2025	Yes – Include in this chapter	17 Minutes for CUA and Badlands April 08 2021
Figure 4	Sample indemnifica tion agreement	Yes – Include in this chapter	05 Indemnification Agreement for Poverty Flats.pdf
[E1]	Laurel Heights decision	No – case law	
[E2]	Clark v. Hermosa Beach; CEQA Guidelines §15151	No – statute/case law	
[E3]	43 CFR §2808.10	No – statute	
[E4]	CEQA Guidelines §15151; Laurel Heights; Clark	No – statute/case law	
[E5]	Friends of B Street v. City of Hayward	No – case law	

[E6]	San Joaquin Raptor Rescue Center	No – case law	
[E7]	Liu Farms transcript pages 38–42	Yes – include in this chapter	06 Transcription hour 2 22 min of Planning May 25 2024 Cannabis Fed Lands
[E8]	PRC §21168.5; Western States Petroleum	No – statute/case law	
[F1]	CEQA Guidelines §15151	No – statute	
[F2]	Omission of BLM letters & IA in MND	Yes – Include in this chapter	Negative Exhibit. Not found in the record. 03 Table of projects approved without lawful access.pdf were reviewed to locate references of the BLM in the MND
[F3]	Sundstrom v. County of Mendocino	No – case law	
[F4]	BLM RFR omission	Yes – Include in this chapter	Negative Exhibit. RFR not sent to BLM (absence in CEQA circulation record) No – omission; no document exists
[F5]	Transcript references (Fields, Irace)	Yes – Exhibit File 00	
[F6]	PRC §21168.5	No – statute	

[F7]	Pattern of omissions since 2020	Yes – Include in this chapter	Negative Exhibit. Not found in the record. 03 Table of projects approved without lawful access.pdf were reviewed to locate references of the BLM in the MND
[F8]	PRC §21168.5; Gov. Code §6200; Penal Code §118	No – statute	
[G1]	CEQA Guidelines §15151	No – statute	
[G2]	Transcript excerpt (Fields, Irace)	Yes – Exhibit File 00	[00] Poverty Flate Overall hearing transcript 2025 05 22 YouTube
[G3]	Public testimony on Board briefing failure	Yes – Include in this chapter	[00] Poverty Flate Overall hearing transcript 2025 05 22 YouTube
[G4]	Gov. Code §§23005, 25203, 25303; Anderson case	No – statute/case law	
[G5]	Friends of B Street v. City of Hayward	No – case law	
[G6]	PRC §21168.5; Western	No – statute/case law	

	States; Clark		
[G7]	Anderson case; Santa Barbara case	No – case law	
[G8]	Santa Barbara; Sundstrom	No – case law	
[H1]	CEQA Guidelines §15003(i)	No – statute	
[H2]	Statement from BLM (Ukiah office)	Yes – Include in this chapter	19 Email with overview of the discussion with the BLM 2025 06 17 2025_Redacted.pdf 2 nd paragraph
[H3]	Mendocino AP_2018- 0061 denial email	Yes – Include in this chapter	07 Email Re Inquiry Regarding Cannabis Transport Across Federal Lands.pdf
[H4]	Topanga Assn. v. County of LA	No – case law	
[I1]	43 CFR §2808.10; BLM denial	Yes – Include in this chapter	Federal Regulation is not include; Denial Letter 04 (UP 23-09) BLM Letter Poverty Flats.pdf
[I2]	Transcript re: IA not reviewed by Board	Yes – Exhibit File 00	[00] Poverty Flate Overall hearing transcript 2025 05 22 YouTube
[I3]	Sundstrom citation	No – case law	

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| [I4] | PRC
§21168.5;
Clark | No –
statute/case
law | |
| [I5] | Mendocino
AP_2018-
0061 denial
email | Yes –
Include in
this chapter | 08 AP_20180061 Stein Hearing Packet
https://www.mendocinocounty.gov/home/showpublisheddocument/27424/636880747512500000 |
| [I6] | PRC
§21168.5;
CEQA
Guidelines
§§15126.2,
15124,
15151 | No – statute | |