

# Property Management Plan

Project: **UP 18-29**

Applicant: **Better Nature Farms LLC**

13306 Elk Mountain Rd Upper Lake, CA 95485

*Version.20191201*

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*This document has been prepared to fulfill the ordinance requirements for UP 18-29. The intent of this Property Management Plan is to identify and locate all existing cannabis and non-cannabis related uses on the property, identify and locate all proposed cannabis and non-cannabis related uses on the property, and describe how all cannabis and non-cannabis related uses shall be managed in the future. This Property Management Plan demonstrates how the operations intended to occur at the commercial cannabis cultivation site shall not harm the public health, safety, and/or welfare of the natural environment and communities of the County of Lake. This document may be amended from time to time to reflect project changes as required.*

### ***Required Sections***

The Property Management Plan consists of the following sections:

1. Air Quality
2. Cultural Resources
3. Energy Usage
4. Fertilizer Usage
5. Fish and Wildlife Protection
6. Operations Manual
7. Pest Management
8. Security
9. Stormwater Management
10. Waste Management
11. Water Resources
12. Water Use

## *Air Quality*

This chapter describes any equipment or activity that may cause the issuance of air contaminants and outline project compliance with the guidelines set forth by the Lake County Air Quality Management Department (LCAQMD).

- a. The designated individual responsible for responding to odor complaints:

Name: *Alex Beck*

Telephone Contact: (321) 368-9448

- b. The following is a list of property owners within 1,000 feet of facilities:

(APN : OWNER MAILING ADDRESS : PARCEL PHYSICAL ADDRESS)

1. 002-023-26 : BOX 146 UPPER LAKE CA 85485 : 13452 WHITE ROCK CANYON RD  
UPPER LAKE CA 95485
2. 002-023-57 : 369 SARA AVENUE SUNNYVALE CA 94086 : 13354 WHITE ROCK  
CANYON ROAD UPPER LAKE CA 95485
3. 002-023-58 : 342 HIGHLAND AVENUE #207 SAN MATEO CA 94401 : 1378 WHITE  
ROCK CANYON ROAD UPPER LAKE CA 95485
4. 002-023-59 : 3430 HILL ROAD EAST LAKEPORT CA 95453 : 13252 ELK MOUN-  
TAIN ROAD UPPER LAKE CA 95485
5. 002-023-60 : 3430 HILL ROAD EAST LAKEPORT CA 95453 : 13276 WHITE ROCK  
CANYON ROAD UPPER LAKE CA 95485
6. 022-004-01 : BOX 657 UPPER LAKE CA 95485 : 12625 ELK MOUNTAIN ROAD  
UPPER LAKE CA 95485
7. 002-025-42 : BOX 11 LAKEPORT CA 95453 : 12757 ELK MOUNTAIN ROAD UP-  
PER LAKE CA 95485
8. 002-023-81 : BOX 1239 UPPER LAKE CA 95485 : 13011 ELK MOUNTAIN ROAD  
UPPER LAKE CA 95485
9. 002-023-88 : 13043 ELK MOUNTAIN ROAD UPPER LAKE CA 95485 : 13043 ELK  
MOUNTAIN ROAD UPPER LAKE CA 95485
10. 002-023-92 : 36 MEADOW GLEN PETALUMA CA 94952 : 13125 ELK MOUNTAIN  
ROAD UPPER LAKE CA 95485
11. 002-023-86 : 13241 ELK MOUNTAIN ROAD UPPER LAKE CA 95485 : 13241 ELK  
MOUNTAIN ROAD UPPER LAKE CA 95485
12. 002-023-38 : 13323 ELK MOUNTAIN ROAD UPPER LAKE CA 95485 : 13323 ELK  
MOUNTAIN ROAD UPPER LAKE CA 95485
13. 002-023-25 : BOX 1236 UPPER LAKE CA 95485 : 13505 ELK MOUNTAIN ROAD  
UPPER LAKE CA 95485
14. 002-023-90 : 77 VAN NESS AVENUE STE 101/1815 SAN FRANCISCO CA 94102 :  
13052 WHITE ROCK CANYON ROAD UPPER LAKE CA 95485

c. This section describes the policies, procedures and actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.

When a complaint is received, a company representative shall follow this response procedure by recording the time, date, name of the individual filing the complaint, description of the event, and any additional information provided, or as required by law, on the document titled **“Odor Complaints Log”**, contained within the company’s **“Performance Review Report”**. A Manager shall respond to complaints in accordance to state and county rules and regulations.

d. This section describes the potential mitigation methods to be implemented for reducing offsite nuisance odors.

Mitigation methods include the following:

- Project siting with maximum distance from roadways and surrounding residences and/or preexisting infrastructure, including a minimum 200’ setback from roadways, as well as taking into consideration prevailing wind direction in relation to neighboring residences.
- Closest residency is located approximately nine-hundred feet (900’) setback from the nearest exhaust port, with only three (3) residences located within a 1000’ radius of the project site, and only eleven (11) residential structures located within a half mile (2,640’) radius of the project site.

e. The following section describes contingency measures taken to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.

- Should these measures fail to fully prevent offsite nuisance conditions, further contingencies include the planting of perimeter vegetation around sensitive use areas and along roadways that possess a pleasant masking odor, such as jasmine or honeysuckle.
- Further contingency measures include the removal of cultivars (strains) that possess a predominance of odors that are typically found to be a nuisance, such as skunk or musk, or the removal of cultivars based on the specific odors listed in the complaints that have been deemed by code enforcement to be a nuisance.

## ***Cultural Resources***

This chapter describes the procedures to be followed if cultural, historical, archaeological, and/or paleontological resources are found on the property.

a. In the event that cultural, historical, archaeological, and/or paleontological resources are to be found on the property during construction or operation, the following procedures shall be implemented:

- If cultural resources are identified during the grading or construction process, work shall cease on the project site until County and/or State approval is granted.
- In the event that a possible cultural, historical, archaeological and/or paleontological resource is discovered by an employee or contractor, it is to be immediately reported to the manager on duty.
- All work shall immediately cease in and around the area that such a resource was located until response from the appropriate local and/or state authorities.
- The manager on duty shall contact the proper County of Lake and/or California State authority as required by law to report the incident.
- Should a use area be set off limits, work shall only commence in the subject area after reentry has been approved by the appropriate local and/or state authority and the subject resource has been cleared of significance and/or removed.
- Should a possible resource be deemed insignificant, work shall commence in the subject area immediately.

For more detailed information on efforts taken in order to minimize disturbance of cultural, historical, archaeological, paleontological resources, and tribal resources, please review the document titled “**Water Board Requirements & Best Management Practices**”.

For more details on Cultural Resources observed onsite, please refer to the following:

### **1. “Cultural Resources Study Report”**

## ***Energy Usage***

The intent of this chapter is to highlight the steps taken in order to minimize energy use involved with commercial cannabis cultivation.

a. Energy Usage Calculation:

The following section provides an energy calculation as required by the California Building Code:

- Average annual commercial energy usage estimate: ~12,000 kWh.
- b. The proposed activities and operations to be located on the lot of record and premises fall below the requirements set forth in CCR Title 3, Division 8, Chapter 1, Section 8305, as the intended use does not involve an “Indoor” or “Mixed-light Tier 2” license.
- c. Alternative energy sources may include sources such as solar photovoltaics and/or gas power generators in the future for emergency purposes, or if required by law.
- d. The intended use associated with this Major Use Permit does not involve the indoor cultivation of cannabis.
- e. The following section describes what parameters will be monitored and the methodology of the monitoring program for energy usage.

Monitoring parameters and devices shall include the following:

- Grid electricity usage shall be monitored through the use of a service panel usage meter (SmartMeter) installed by PG&E. These records shall be maintained for a minimum of seven (7) years, or as otherwise required by law.
- If implemented, Solar PV generation shall be monitored through the use of a grid-tied inverter systems with metering and data-logging capabilities. These records shall be maintained for a minimum of seven (7) years, or as otherwise required by law.
- If implemented, Liquid Propane Gas or Diesel usage shall be monitored and recorded via sales invoices. These records shall be maintained for a minimum of seven (7) years, or as otherwise required by law.

The preceding records shall be maintained on an annual basis, or as otherwise required by law. Record of energy usage measurements may be found in the “**Performance Review Report**” under the section titled “**Energy Usage Log**”. All records of energy usage shall be made available to county and state officials, and shall be maintained for a minimum of seven (7) years, or as otherwise required by law.



## ***Fertilizer Usage***

The intent of this chapter is to highlight the steps taken to ensure consistency of fertilizer storage and use with the other sections of the Property Management Plan. This section shall describe how the company shall implement with the following fertilizer application and storage protocols:

- a. Applicators handling “*Restricted Use*” or “*General/Unrestricted Use*” shall follow all local, state, and federal guidelines and levels directions when handling fertilizer or pesticide products. When handling and applying “*Restricted Use*” pesticides, applicators shall follow all label directions and shall either possess, or be under the direction and supervision of an individual possessing a Qualified Applicator Certificate, or equivalent certification as approved through the California Department of Pesticide Regulations and/or any other qualification should a local authority impose such requirements. At present, no such “*Restricted Use*” products are anticipated to ever be utilized onsite.
- b. Chemical segregation procedures shall be implemented and all agricultural chemicals, including fertilizers and pesticides, shall be stored in a secure and enclosed area. Dry storage of fertilizers shall be contained within a non-use area designated for storage only. Diluted fertilizer mixtures shall be contained within steel drums and properly secured to safety hitches. Should additional fertilizer storage requirements be implemented in the future, necessary adjustments shall be made as needed.
- c. In order to contain any fertilizer spills and immediately clean up any spills, owner-operators and contractors shall be trained in proper handling and use protocols for all equipment and supplies, including fertilizer and pesticide applicators. Training is given on how to properly: identify potential hazards, utilize PPE equipment, maintain equipment, and safely mitigate any potential spill.
- d. In order to apply the minimum amount of product necessary, strictly sourced and properly inspected raw materials selection ensures product and job site safety. The operations management team has over a decade of combined experience managing large-scale commercial cultivation operations in Colorado and Washington State, and therefor have a deepened understanding of the materials required for crop-specific production.

As is such, certain cannabis-specific or hydroponic products that are conventionally used by cannabis producers are avoided. This experience has led to the selection of certain brands and specific products that drastically reduce the amount of nitrogen and other fertilizers that are used versus traditional cannabis material supply inputs, and even more so when compared to conventional fruit and vegetable crop production. This approach significantly minimizes any potential negative impact on ground water sources and the surrounding natural resources and wildlife.

- e. In order to prevent offsite drift, all *fertilizers* and *pesticides* shall be applied with the appropriate application method based on Best Management Practices set forth by the CDFA, DPR, and the SWRCB.
- f. Considerations have been made to *not* spray directly onto surface water or allow fertilizer product to drift onto surface water. Fertilizers and pesticide mixtures shall only be sprayed when wind is blowing away from surface water bodies. All premises where pesticide application shall take place are within enclosed structures as to prevent any on-site or offsite cross contamination with any natural resource.
- g. Additionally, considerations have been made in order to prevent the application of fertilizers and/or pesticides that may reach surface water or groundwater. The growing medium, container dimensions, watering frequency, irrigation emitter type, and concentration of nutrient solution have all been carefully selected in order to minimize runoff and prevent fertilizer from impacting the surrounding natural resources.
- h. The project does not intend on using fertilizer within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland, or vernal pool.

Please see the document titled “**Sheet 4. Site Plan, Proposed Conditions**” showing a map of the parcel indicating where the cultivation site is located, including indicators showing any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record, and a 100-foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool, including the location of where fertilizers will be stored and used.

The following is a description of what parameters shall be monitored, and the methodology of the monitoring program.

Devices to be used in the fresh water and nutrient solution monitoring program include:

- Electronic TDS / pH Meter (Make: Bluelab / Model: # 716441);
- Flow meter (Make: Assured Automation / Model: WM-NLC-050).

Parameters to be monitored include:

- Total Dissolved Solids (TDS), measured in units of PPM (Parts-per-million) or EC (Electric Conductivity);
- Alkalinity (pH);
- Calculation for total water used per year based on irrigation pump usage logs.

Records of fertilizer and pesticide usage and monitoring records shall be made available to local and state officials, as required by law, and maintained for a minimum of seven (7) years, or as otherwise required by law. Record of fertilizer usage measurements may be found in the **“Performance Review Report”** under the section titled **“Fertilizer/Pesticide Usage Log”**.

## ***Fish and Wildlife Protection***

This following chapter describes the various types of wildlife and habitats that may be found on the lot of record, and the considerations made in order minimize adverse impacts on fish and wildlife.

a. The following is a description of the fish and wildlife that are located on or utilize on a seasonal basis the lot of record where the permitted activity is located. Some of the seasonal wildlife, as described by the Lake County Forest Preserves Department's database of Lake County Species, that may be found onsite include:

- Ground squirrel, rattle snake, tule elk, mountain lion, and avian species including:
  - American Bald Eagle, Blue Heron, Wood Duck, Woodpecker.

b. The main habitats found on the lot of record, as defined by the California Department of Fish and Wildlife's "**California Wildlife Habitat Relationships Systems**" and the publication "**A Guide to Wildlife Habitats of California (1988)**", include:

- Tree dominated habitats in the form of Valley Oak Woodland (VOW),
- Herbaceous dominated habitats in the form of Wet Meadow (WTM) and Pasture (PAS) types, and
- Aquatic habitats in the form of Riverine (RIV) type.

Note: Locations of each habitat may be found on the attached document titled "**Sheet 11. Habitat & Watershed**".

c. The watershed located at the project site where permitted activity shall be located includes Salt Creek and Middle Creek. Locations of the aforementioned watershed may be found on the attached document titled "**Sheet 11. Habitat & Watershed**".

d. In order to minimize adverse impacts on the fish and wildlife, the property lessor and lessee have agreed to refrain from hunting, trapping, and fishing or damming of any riparian way either on or adjacent to the lot of record. Additionally, the use of rodenticide and other pesticides shall be minimized as part of the Integrated Pest Management program.

e. Also included on "**Sheet 11. Habitat & Watershed**" is an indicator showing the location of any conservation easements or wildlife corridors proposed, as applicable.

For more details on Fish & Wildlife resources observed onsite, please refer to the following:

### **1. "Biological/Botanical Resource Study Report"**

## 2. “CVRWCB Site Inspection Report”

### *Operations Manual*

The following chapter describes the operating procedures of the commercial cannabis cultivation site to ensure compliance with the Major Use Permit, and to what efforts shall be taken protect the public health, safety and welfare, as well as the natural environment of Lake County.

- a. Authorization for the County of Lake: As of the process date of this document, *Better Nature Holdings LLC*, and it’s wholly owned subsidiary, *Better Nature Farms LLC*, hereby authorizes the County, its agents, to seek verification of the information contained within the development permit or use permit applications, the Operations Manual, and the Operating Standards at any time before or after development or use permits are issued.
- b. The screening process implemented for vetting potential personnel shall include the following (*Note: all screening processes include adherence to the Federal Trade Commission and Equal Employment Opportunity Commission, and California Labor and Employment Law rules and regulations*):
  - During the interview process, interviewees shall be asked a series of questions in regards to previous job performance and other life events. These include specific questions in regards to past events or hypothetical situations that may test one’s ethical and moral standards. This is performed in the hopes to better gauge the applicant’s propensity to commit a crime such as an act of theft, violence, or product diversion.
  - The professional referrals, as well as the previous employers, as provided in the résumé shall be contacted and asked a series of probing questions in regards to the applicant.
  - If the “credit check” clears the criteria to obtain management approval, the applicant shall complete a LiveScan criminal background check through the Lake County Sheriff’s Department.
  - If the LiveScan background check clears the criteria to obtain management approval, and also the requirements as set forth by Article 72 of the Lake County Land Use Ordinance, then the applicant shall be approved for work.

- If in the future, the State of California and its licensing authorities in regards to commercial cannabis activities (California Department of Food and Agriculture, Bureau of Cannabis Control, etc.) require additional screening or credentials (such as state-issued employee ID badges for access to sensitive use premises), the applicant shall first obtain all necessary state approval before commencing work.
- c. The facility shall be open on average from 6:30 a.m. until 7:30 p.m., Monday-Friday, including holidays.
- d. In addition to the methods outlined in the chapters titled “**Energy Usage**” and “**Fertilizer Usage**”, the following considerations shall be implemented in order to minimize or offset the carbon footprint from operational activities:
- Materials selection focusing on minimizing waste materials, including:
    - Use of compostable/biodegradable growing medium;
    - Use of biodegradable/recyclable plant containers;
    - Use of high quality irrigation components that require less frequent replacement throughout their lifecycle;
    - Use of recyclable and reusable gloves and other personal protective equipment (PPE) when possible;
    - Use of long-lasting building materials that require less frequent replacement.
  - Local materials sourcing when possible.
  - Proprietary scheduling that minimizes the amount of employee, work, and delivery vehicles going to-and-from the project site per day.
  - Primary distributors and processors, and other downstream entities within the supply chain, are located as close to project site as possible (i.e. Ukiah, Santa Rosa), reducing carbon emissions related to the transport and delivery of finished goods.
- e. The following describes the chemicals stored, used and any effluent discharged as a result of operational activities. All owner-operators shall be trained in the proper handling of hazardous materials and chemicals and emergency procedures, following guidelines set forth by the manufacturer’s SDS, DPR, CCR Title 8, and EPA requirements.

Copies of MSDS/SDS information for all chemicals shall be stored onsite and made available to owner-operators and inspectors at any time. These records shall be updated as new chemicals or hazardous materials are introduced and maintained in the “**Performance Review Report**” under the section titled “**SDS**”.

Chemicals and/or hazardous materials stored onsite do not exceed the amounts defined as acceptable safe limits of hazardous or corrosive materials as defined in the California Code of Regulations, and may include the following sanitary and agricultural chemicals:

- Chlorine or ammonia-based cleaning products; Hydrogen peroxide, Potassium silicate; Calcium nitrate; Iron phosphate; Elemental Sulfur.
- f. The following section establishes and implements written procedures to ensure that the grounds of the premises controlled by the permittee are kept in a condition that prevents the contamination of components and cannabis products. The methods for adequate maintenance of the grounds shall include at minimum:
- (i) All equipment for use in operations, or for the means of grounds maintenance, shall be properly stored in a safe and secured area as to prevent risk of ground-water contamination, exposure to owner-operators or contractors, or the potential increase in fire hazard. Litter and waste that accumulate either by means of operations or from littering of adjacent roadways shall be removed and placed in proper waste storage receptacles as to prevent the accumulation of potentially combustible waste materials. The proper storage of materials and equipment, removal of litter and waste, and waste materials resulting from the cutting of weeds and/or grass shall be removed on a regular basis as needed so that the premises shall not constitute an attractant, breeding place, or harborage for pests.
  - (ii) Additional groundskeeping efforts shall be implemented to ensure the proper maintenance of roads, yards, and parking lots so that these areas shall not constitute a source of contamination in areas where cannabis products are handled or transported. This includes the mowing or removal of weeds, and potential addition of gravel as needed.
  - (iii) Provisions have been made and design efforts shall be implemented which include a combination of design features and employee procedures that have been implemented in order to provide for adequate draining areas in order to prevent contamination by seepage, foot-borne filth, or the breeding of pests due to unsanitary conditions.

- (iv) Adequate provisions shall be implemented to ensure the proper maintenance of waste treatment systems so as to prevent contamination in areas where cannabis products may be exposed to such a system's waste or waste by-products. This includes the design and construction of waste water and septic systems in accordance to local and state guidelines, prepared by a licensed design professional competent in the design of septic systems, plumbing, and/or waste water management.

Since the lot of record is bordered by grounds outside the applicant's control that are not maintained in the manner described in subsections (i) through (iv) of this section, inspection, extermination, and other reasonable care shall be exercised within the lot of record in order to eliminate any pests, dirt, and/or filth that pose a source of cannabis product contamination. Routine procedures shall be conducted on a regular basis by means of a perimeter inspection of the lot of record on which the operations are located to determine if further mitigation efforts are required, and if so implemented.

**Note:** This project is currently enrolled in the California Department of Fish and Wildlife's "Self-certification" program for meeting Lake and Streambed Alteration requirements. For more information, please refer to the following documents:

- 1. "CDFW LSA Self-certification Letter"**
- 2. "CDFW LSA Self-certification Response"**



## ***Pest Management***

This chapter describes the measures taken to ensure consistency of pest management with the other sections of the Property Management Plan.

This section shall describe how cultivation permittees shall comply with the following pesticide application and storage protocols:

- a. If required, pesticide applicators shall possess a current and valid Qualified Applicator License (QAL) through the California Department of Pesticide Regulation (DPR). As such, all use of restricted pesticides or chemicals shall be in compliance with the California Food and Agriculture Code, Division 6 Pest Control Operations and Division 7 Agriculture Chemical; Chapter 1 – 3.6 and California Code of Regulations, Division 6 Pest Control Operations.
- b. When applying pesticides with use restrictions, the applicator shall either possess a QAL, or be under the immediate supervision and direction of an employee possessing a QAL. Any employee applying pesticides shall first complete the proper training in accordance to the orders and requirements set forth by the Lake County Department of Agriculture, the Department of Pesticide Regulations (DPR), and the California Department of Food and Agriculture. As part of this training, applicators shall first read all use instructions described on the product label whether it be for restricted or general use.
- c. All hazardous materials and corrosive chemicals that may pose an increase risk of fire hazard shall be stored in a fire-rated container located in a safe and secured building or storage shed in order to prevent access by wildfire.
- d. All owner-operators and contractors occupying cultivation and chemical storage facilities shall be trained on the proper handling and emergency procedures for mitigating chemical leaks or spills. These procedures shall be in compliance with the California Code of Regulations.
- e. In order to prevent offsite drift, procedures have been developed with guidance provided by the Department of Pesticide Regulation and the California Department of Food and Agriculture. All pesticides shall be applied in accordance to label requirements and the guidelines provided by the DPR. For soil drench application, pesticides shall be incorporated into an injection-style fertigation system and delivered via drip emitters when being applied to crops. For foliar application, pesticides shall be incorporated into the pump sprayer holding tank, and applied using with the proper nozzle selection and spray height adjustments.
- f. No pesticide shall be applied in areas where pollinators are present. Insect screens on intake vents of greenhouses prevents pollinators from enter sensitive use sites. Additional

precautions have been made order to order to prevent possible cross-contamination by limiting pesticide use in times of increased seasonal presence of pollinator species of insects and invertebrates.

- g. Further, as a result of the previously described precautions and design features, the potential for drift to nearby flowering plants attractive to pollinators is mitigated almost entirely.
- h. Considerations have been made to not spray directly onto surface water or allow pesticide products to drift onto surface water. Pesticides shall only be applied when wind is blowing away from surface water bodies. All premises where pesticide application shall take place are within enclosed structures as to prevent any onsite or offsite cross contamination with any natural resource.
- i. Further, as a result of the previously described precautions, the possibility that pesticides might reach surface water or groundwater is mitigated almost entirely.
- j. Only use of properly labeled pesticides shall be permitted. All pesticides shall only be used according to the directions for use as described on the product label.
- k. As a company policy, and in accordance with the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board orders, regulations, and procedures, the use of pesticides within one-hundred (100) feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool is strictly prohibited.

In order to meet the requirements pursuant to this section, please see the document titled “**Sheet 4. Site Plan, Proposed Conditions**”. This map includes the location of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within one-hundred feet (100’) of the lot of record and a one-hundred foot (100’) setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

Note: The aforementioned map identifies the location of where pesticides shall be used and stored on site.

## *Security*

This chapter describes the considerations taken in order to minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The security provided on the premises shall be adequate as approved by the Sheriff and pursuant to this section, including lighting and alarms, to ensure the safety of persons and to protect the premises from theft.

The following describes the minimum security measures to be taken:

- a. For the protection and safety of workers and the community, the following efforts have been taken into consideration in order to prevent unauthorized persons from entering sensitive use areas:
  - Perimeter fencing of sensitive use and cultivation premises shall be installed in compliance with Article 72. Fencing shall meet the maximum height restrictions as allowed in the Zoning Ordinance in order to prevent unapproved access to the sites as much as possible.
  - Implementation of minimum eight (8) feet in height perimeter fencing around all sensitive use areas intended for the cultivation, processing, and/or storage of cannabis.
  - Implementation of locking gates with commercial-grade locks, located at all entry points to sensitive use areas.
  - Secondary perimeter fencing along the roadside and around the entirety of the project site.
  - A security alarm systems shall be installed to notify and record incident(s) where physical barriers have been breached. This includes motion-sensors on lights and night-vision security cameras located along the perimeter barriers of sensitive use area. The tripping of motion sensors shall trigger an alert and notify the manager on duty of the breach. If a breach is deemed to be a potential security threat, the necessary procedures shall be taken in order to notify local law enforcement, and the execution of emergency procedures in order to ensure employee safety.
  - Prior to accessing sensitive use sites, all visitors, contractors and owner-operators shall report to the administrative office for intake; logging the requested information on an “**Arrival/Departure Log**” as required and instructed by state and county regulations. This log takes record of all individuals entering and leaving sensitive use areas.
  - Premises shall be maintained in such a manner that visibility and security monitoring is always possible. This includes the appropriate placement and potential reorientation or adjustments to any video surveillance cameras in order to record a clear and unobstructed view. Equipment shall be properly stored during and after use in order to minimize ob-

struction of the view of security cameras. Additionally, efforts shall also be made in order to maintain vegetative material from potentially obstructing the view of security cameras.

- Procedures have been established for the investigation of suspicious activities. Company policy and procedures for theft and diversion prevention include procedures for the investigate and reporting any suspicious activity. These procedures include periodic review of video surveillance footage, establishing best management practices as recommend by law enforcement and relevant state agencies, and an action plan for notifying local and/or state authorities of potential breaches, as required by law.
- b. Prevention of theft or loss of cannabis and cannabis products shall be achieved by implementing the following:
- Implementation of the state-required track-and-trace monitoring system METRC, his information shall be made available for review by local and/or state authorities as requested. This information shall be review pre- and post-harvest, and shall be recorded and maintained for a minimum of seven (7) years, or as otherwise required by law.
  - Entrances/exits to sensitive use areas within the premises shall be closed and secured when not in use, and may only be accessed in order to complete job duties. These areas shall only be accessible during the times of normal business hours. Areas containing finished product storage shall only be accessible to a limited number of personnel. These precautions shall be implemented in order to prevent potential product theft and/or diversion.
  - In order to prevent diversion in use areas prone to posses a high risk potential, the following precautions shall be implemented:
    1. The loading and unloading of cannabis transportation vehicles shall be contained to a secure area under constant video surveillance.
    2. Secure areas shall be fully enclosed and locked during product transfer from storage facilities into transportation vehicles.
    3. Only a limited number of select personnel shall ever have clearance to access this area.
    4. Transportation vehicles shall enter the loading/unloading dock through a lockable roll-up door.
    5. Roll-up doors shall be closed and locked during loading/unloading of cannabis materials.

6. Additional security cameras, motion sensors, and restricted-access entry points shall be implemented in all processing and storage areas.
- Specific employee use areas have been designated in order to provide for storage and access to personal items for authorized personnel.
- c. This section includes a description of procedures on receiving complaints, responding to the complaints, maintaining records of all complaints and resolution of complaints, and providing a tally and summary of issues the annual Performance Review Report.

Emergency contacts:

- Name: Alex Beck, phone: (321) 368-9448, email: alex@betternature.net
- Name: William Beck, phone: (321) 368-3141, email: bill@betternature.net

When a complaint is received by an emergency contact as listed above, the following procedures shall be implemented in order to fulfill the requirements of this section. When receiving a complaint, the emergency contact shall record the name, address, phone number, and nature of the complaint in the “**Performance Review Report**” section titled “**General Complaints Log**”. This log shall contain a tally of total complaints, as well as a summary of the complaint. Depending on the type of complaint, the emergency contact shall proceed to address the issue by providing a response and a resolution. The following is a description of the procedures on receiving complaints, responding to the complaints, maintaining records of all complaints and resolution of complaints, and providing a tally and summary of issues in the annual “**Performance Review Report**”:

- If the issue is related to nuisance odor, mitigation actions shall be taken, as described in the chapter titled “**Air Quality**” of this plan, in order to mitigate any public nuisance.
  - If the issue is related to theft or trespassing of property, the emergency contact shall notify the local Sheriff’s department.
  - If the issue is related to increased road traffic, efforts shall be made in order to incentivize workers to carpool or reduce their trips on and offsite throughout the work day.
  - If the issue is related to nuisance noise levels, the emergency contact shall take necessary actions to ensure the reduction of nuisance noise levels, including the implementation of acoustic dampeners or noise suppressors for the equipment generating the noise.
- d. The following, at minimum, shall be implemented in regards to the video surveillance system in order to meet the requirements of this section.

(i) All predetermined surveillance and use areas, including both production and non-production areas, shall be equipped with a digital video surveillance system. This system shall meet the requirements as set forth in Ord. 3073 and Article 72, as well as the requirements outlined in the state regulations and Business Professions Code. This surveillance system shall be able to record with a minimum camera resolution of 1080 pixels, and shall be capable of recording all pre-determined surveillance areas in any lighting conditions

(ii) The video surveillance system shall be capable of supporting remote access by the permittee via a secure video feed, accessed through a browser-based portal. This feed shall also be provided to the Lake County Sheriff's Department, and any other local or state agency or authority as deemed necessary by law.

(iii) To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

(iv) Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:

- The perimeter of the cannabis cultivation site;
- Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;
- Areas where cannabis is destroyed, limited-access areas and security rooms;
- Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and
- The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.

(v) The surveillance system shall operate continuously 24 hours per day and at a minimum of 30 frames per second.

(vi) All exterior cameras shall be waterproof, I-66 minimum.

(vii) All interior cameras shall be moisture proof.

(viii) Cameras shall be color capable.

(ix) Video management software shall be capable of integrating cameras with door alarms.

(x) Video recordings shall be digital.

(xi) Thermal technology shall be use for perimeter fencing.

(xii) All cameras shall include motion sensors that activates the camera when motion is detected.

(xiii) In areas with inadequate lighting for the cameras being used, sufficient lighting shall be provided to illuminate the camera's field of vision.

(xiv) All recording shall be located in secure rooms or areas of the premises in an access and environment- controlled environment which is separate from the room where the computer and monitoring equipment is located.

(xv) All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.

(xvi) All video surveillance recordings are subject to inspection by the Department and shall be copied and sent, or otherwise provided, to the Department upon request.

(xvii) The video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images.

e. The following is a description of the minimum requirements to be implement onsite in regards to walls, fencing and other perimeter requirements.

(i) All commercial cannabis cultivation on site shall be enclosed by a fence. The fence shall include, at a minimum, the following:

- Posts set into the ground. The posts may be steel tubing set in concrete.
- Terminal posts shall be set in concrete footing or otherwise anchored to prevent leaning under the tension of a stretched fence.
- Posts set between the terminal posts shall be set at intervals not to exceed 10 feet. A top horizontal rail is required between all posts.
- The fence shall be attached to the posts and top horizontal rail.

(ii) No barbed wire, razor wire or similar design shall be used.

(iii) The cultivation area shall be appropriately screened from public view via vegetation and opaque screening along the perimeter.

## ***Stormwater Management***

The following chapter describes the efforts taken in order to protect the water quality of the surface water and the stormwater management systems managed by Lake County, and to evaluate the impact on downstream property owners.

- a. The following practices shall be implemented to protect downstream receiving water bodies from water quality degradation:
  - Usage and storage of pesticides, fertilizer, or any other chemical that may negatively impact water resources shall be contained to disturbed areas that are protected from storm water runoff.
  - Adequate stormwater drainage systems shall be designed and installed on all proposed new structures in accordance to local and state requirements.
  - Gable-style gutter-connect greenhouse structures intended for use allow for the installation of stormwater catchment and grey water recovery systems.

Please see the attachment titled “**Sheet 3. Site Plan, Proposed Conditions**” for a graphic representation of how stormwater shall be managed.

- b. Please see the attached document titled “**Water Board Requirements & Best Management Practices**” located in the appendix of this application packet for a written and graphic representation of how the applicant will comply with *California State Water Board*, the *Central Valley Regional Water Quality Control Board*, and the *North Coast Region Water Quality Control Board* orders, regulations, and procedures as appropriate.
- c. Since no outdoor cultivation is proposed on the premises, there shall be no outdoor cultivation, or the associated topsoil, pesticide or fertilizers for such a use, located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.
- d. According to “Title 40 of the Code of Federal Regulations, Section 122.26”, illicit discharges of irrigation or storm water from the premises could result in degradation of water quality of any water body. As a matter of company policy, such activities that may potentially increase this risk are strictly prohibited. Please see the document titled “**Water Board Requirements & Best Management Practices**” for more detailed information.
- e. At present, there are no drainage or conveyance systems maintained by Lake County located on the lot of record intended for the purposes of this Major Use Permit. Should this change in the future, documentation shall be provided in order to ensure that stormwater



discharge is in compliance with the design parameters of those structures, as deemed by the law.

- f. Due to the slope, terrain, topography and elevation of the proposed cultivation project site in relation to surrounding public roads and bridges, there are no such public roads or bridges that are downstream of the discharge point of stormwater from the structures intended for this Major Use Permit.
- g. Due to the slope, terrain, topography and elevation of the proposed cultivation project site, and the orientation of gutters, drain pipes and leach fields associated with the proposed structures intended for commercial cannabis cultivation and accessory uses in this Major Use Permit, the proposed stormwater discharge generated from said structures shall not increase the total volume of water that historically has flowed onto adjacent properties. The project site on the lot of record is below the elevation of any adjacent parcel. Additionally, the orientation of drain pipes on the proposed structures are oriented so that stormwater discharge does not increase the total volume of water that has historically flowed onto adjacent properties. Stormwater catchment shall be installed in captured stormwater shall be stored and reused for crop irrigation, and shall be in compliance with Section 492.14 of the *Model Water Efficient Landscape Ordinance*. Should additional information in regards to fulfilling the requirements of this section be required to determine the completeness of this Major Use Permit, such information shall be provided as recommended by the Planning Commission.
- h. A qualified civil engineer has reviewed the proposed site plan and water management sections of this management plan and has determined that the proposed structures and anticipated use shall not increase flood elevations downstream of the discharge point. For additional information, please review the document titled “**Water Board Requirements & Best Management Practices**”. Should additional information in regards to fulfilling the requirements of this section be needed to determine the completeness of this Major Use Permit, such information shall be provided as recommended by the Planning Commission and/or Community Development staff.
- i. In order to maintain compliance with the requirements set forth in Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance, please review the attached document titled “**Water Board Requirements & Best Management Practices**”. These BMPs shall be updated to include the following prior to the commencement of operations and execution of this use permit: Schedules of activities, prohibition of practices, general good housekeeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce to the maximum extent practicable the direct and indirect discharge of pollutant to the County storm drainage system and to natural surface waters. BMPs shall also be defined to include, but not limited to, structural controls, source controls, treatment controls, training requirements, operating and maintenance procedures, practices to control plant site runoff, ero-

sion and sediment control reduction practices, spillage or leaks, sludge or waste disposal or drainage from raw materials storage

- j. Zero grading of the property is required in order to provide a level surface for the foundation of the proposed structures to be constructed on the project site. For a graphic representation of the slope, terrain, and topography of the site, please refer to the document titled “**Sheet 3. Site Plan, Existing Conditions**” and “**Sheet 9. USGS Topographical Map**”, located in the appendix of this application packet.
- k. Best Management Practices (BMPs) in regards to proper storm water management, as well as general construction-related BMPs, shall be followed in accordance to California state law by the licensed general contractor / project manager during construction of the project described herein. This general contractor / project manager shall be the same general contractor as identified on the Building Permit application that is to be submitted in conjunction with this Major Use Permit, in order to receive the necessary Building Permits for the construction of the structures intended for use described in this Major Use Permit application. Please see the attachment titled “**Source Control / Good Housekeeping / BMPs**” for additional information.

Post-Construction BMPs shall be maintained throughout the life of the Major Use Permit. Such practices shall include:

- Regular monitoring and maintenance of facility stormwater management systems.
  - Maintaining of records and monitoring of stormwater discharge.
  - Updates to the stormwater management plan as needed to remain compliant with future rules and regulations.
  - In the event of a severe weather event or natural disaster, such as a drought or flood, a licensed hydrologist shall be consulted to provide analysis in order to make amendments to the stormwater management plan as necessary.
- l. All owner-operators shall be trained to routinely inspect the premises and report any observed damage or signs of erosion caused by stormwater discharge. In addition, all owner-operators shall be trained to report any incidence of damaged or leaking stormwater catchments or gutter systems, as well as chemical or hazardous materials spills or leaks that may potentially harm workers or may be introduced into surrounding water systems and/or ground water sources. Standard operating procedures shall be implemented in order to mitigate and properly clean and dispose of any chemical or hazardous materials spill, as well as procedures for maintaining and repairing damaged areas caused by erosion due to storm water discharge. Record of incidents shall be recorded in the “**Performance Review Report**” under the section “**Stormwater Management Log**”.

## ***Waste Management***

This chapter describes efforts taken in order to minimize the generation of waste and dispose of such waste properly, to prevent the release of hazardous waste into the environment, minimize the generation of cannabis vegetative waste and dispose of cannabis vegetative waste properly, and manage growing medium and dispose of growing medium properly.

### ***Solid Waste Management***

The following is an estimate of the estimated maximum amount of solid waste that will be generated on an annual basis and daily during peak operational seasons, measured in pounds (lbs.) per year, by the following categories:

- Paper: 200;
- Glass: 20;
- Metal: 75;
- Electronics: 20;
- Plastic: 250;
- Inerts: 20;
- Household hazardous waste: 20;
- Special waste: 0;
- Mixed residue: 10;
- Organic waste: 500 (*Waste Exempt as per HSC 25143.2(b) & Title 22, 66261.4(a)*);

### ***Minimizing Solid Waste Generation***

Several considerations have been made in order to minimize the total amount of solid waste generated onsite, including:

- purchasing supplies and raw materials in bulk;
- working with vendors in order to minimize packaging waste;
- conservation soil fertility management practices;

- composting and reusing spent growing medium and vegetative cannabis waste;
- minimizing the use of fertilizers and pesticides on an as-needed basis;
- implementation of reusable PPE whenever possible;
- implementation of compostable bathroom and cleaning supplies;
- implementation of high quality tools and equipment that are less prone to breakage.

#### *Waste Collection Frequency and Method*

Regular waste shall be collected as-needed, by the *Lake County Waste Management Services, or C&S Waste Solutions, located at 230 Soda Bay Road Lakeport, California 95453.*

Organic, recyclable, RCRA materials, non-RCRA materials, and universal waste shall be collected as needed, and shall be transported to the *Quackenbush Mountain Recovery & Compost Facility, located at 16520 Davis Street Clearlake, California 95422, or C&S Waste Solutions, located at 230 Soda Bay Road Lakeport, California 95453.*

#### *Solid Waste Temporary Storage*

Non-recyclable or and non-compostable solid waste shall be temporarily stored onsite in a lockable dumpster.

The following describes the composting, recycling, or final disposal location for the following categories of solid waste:

- Paper: Stored in sealed bins designated for recyclable materials only.
- Glass: Stored in sealed bins designated for recyclable materials only.
- Metal: Stored in sealed bins designated for recyclable materials only.
- Electronics / Universal Waste: Stored in sealed bins designated for universal waste materials only.
- Plastics: Stored in sealed bins designated for recyclable materials only.
- Organics: Stored in sealed bins designated for compostable materials only.
- Inerts: Stored in sealed bins designated for solid waste materials only.

- Household hazardous materials: Stored in sealed bins designated for hazardous waste materials only.
- Special waste: Stored in sealed bins designated for hazardous waste materials only.
- Mixed residue: Stored in sealed bins designated for hazardous waste materials only.

### *Solid Waste Composting, Recycling, and Disposal*

All solid waste generated on site of the above mentioned categories shall be composted, recycled, or disposed of at either *Quackenbush Mountain Recovery & Compost Facility, located at 16520 Davis Street Clearlake, California 95422*, or *C&S Waste Solutions, located at 230 Soda Bay Road Lakeport, California 95453*.

## ***Hazardous Waste Management***

The following chapter describes the various aspects of the Hazardous Waste Management plan as well as providing an analysis on potential hazards.

### ***Hazard Analysis***

The following is a hazard analysis intended to identify or evaluate known or reasonable foreseeable hazards for each type of cannabis product produced at the facilities, in order to determine where there exist any hazards requiring preventative control. Each of the identified hazards have varying degrees of potential illness or injury to end users that may occur as a result of a given hazard. The severity of each of these risk factors has been broken into categories and ranked from low to high, as well as the probability such hazard will occur *without* the presence of preventative controls. Both factors are included below.

Potential hazards may include:

- (i) Biological and microbiological hazards— broken down by hazard type, risk factor, and risk potential— including:
  - Aspergillus fungus, Risk factor: Moderate, Potential: Low;
  - E. Coli, Risk factor: High, Potential: Low;
  - Staphylococcus, Risk factor: High, Potential: Low;
  - Botrytis (mold spores), Risk factor: Moderate, Potential: Low,
  - Powdery mildew, Risk factor: Low, Potential: Low;
  - Yeast, Risk factor: Low, Potential: Low.
- (ii) Chemical hazards, including radiological hazards, pesticide(s) contamination, solvent or other residue, natural toxins, decomposition, unapproved additives, or food allergens, including:
  - Arsenic, Risk factor: High, Potential: Low;
  - Cobalt, Risk factor: High, Potential: Low;
  - Lead, Risk factor: Moderate, Potential: Low;

- Mercury, Risk factor: High, Potential: Low;
- Calcium nitrate, Risk factor: Low, Potential: Low;
- Iron phosphate, Risk factor: Low, Potential: Low;
- Diatomaceous earth (silica), Risk factor: Low, Potential: Low;
- Potassium silicate, Risk factor: Low, Potential: Low.

(iii) Physical hazards, including:

- Stone, Risk factor: Low, Potential: Low;
- Glass, Risk factor: Moderate, Potential: Low;
- Metal fragments, Risk factor: Moderate, Potential: Low;
- Hair, Risk factor: Low, Potential: Low;
- Insects, Risk factor: Low, Potential: Low;
- Miscellaneous debris, Risk factor: Moderate, Potential: Low.

The following sections serves as an evaluation of the conditions that pose a potential hazard risk if not properly designed and/or implemented, and the appropriate standard operating procedures that shall be implemented in order to minimize potential risks:

(i) Sanitary conditions of manufacturing premises;

- Daily sanitation and cleaning of all work areas, surfaces, tools and equipment used in the manufacturing and packaging process;

(ii) The product formulation process;

- For any formulation of cannabis materials intended for consumption, the necessary precautions and procedures shall be maintained in order to reduce potential exposure to the identified hazards. At present, the operations described herein and intended for this Major Use Permit do not anticipate such a use.

(iii) The design, function and condition of the manufacturing facility and its equipment;

- Scheduled facilities maintenance

- Scheduled groundskeeping;
- Scheduled equipment and PPE maintenance.

(iv) The ingredients and components used in a given cannabis product;

- When incorporating ingredients and/or components used in a given cannabis product intended for sale and consumption, the necessary precautions and procedures shall be maintained in order to reduce potential exposure to the identified hazards. At present, the operations described herein and intended for this Major Use Permit do not anticipate such a use.

(v) The operation's transportation and transfer practices;

- Finished cannabis products shall be stored and transferred in sealed plastic containers which are intended to prevent exposure.
- Safe temperature and humidity ranges shall be maintained within storage and transfer facilities, as well as the transportation vehicle itself.

(vi) The facility's manufacturing and processing procedures;

- All owner-operators and contractors shall be trained to inspect and properly identify all of the potential hazards listed as part of the manufacturing and processing procedures.
- If identified, workers shall follow the necessary protocol to properly quarantine, record, and dispose of the defected or contaminated product.

(vii) The facility's packaging and labeling activities;

- All owner-operators and contractors shall be trained to inspect and properly identify all of the potential hazards listed as part of the packaging and labeling activities.
- If identified, owner-operators and/or contractors shall follow state agency recommended BMPs in order to properly quarantine, record, and dispose of the defected or contaminated product.

(viii) The storage of components and/or the finished cannabis product;



- All owner-operators and contractors shall be trained to inspect and properly identify all of the potential hazards listed when transferring components and/or the finished cannabis product in and out of storage areas.
- If identified, owner-operators and contractors shall follow the necessary protocol to properly quarantine, record, and dispose of the defected or contaminated product.

(ix) The intended or reasonably foreseeable use of the finished cannabis product:

- All products leaving the facilities shall be labelled appropriately, as required by California and Federal law, identifying potential risks including:
  - Proposition 65 warning;
  - Potential choking hazard;
  - Potential asphyxiation;
  - Potential allergic reaction;
- Potential risks involved with cannabis use in conjunction with the operation of heavy equipment or a motor vehicle;
- Packaging in compliance with state law shall be implemented in order to access prevent children and minors from accessing and using finished cannabis products.
- Since the intended operations for the proposed use in this Major Use Permit only involve wholesale business-to-business transactions of bulk cannabis product, it is not anticipated that the products produced from the proposed operations shall ever reach the end-user in the packaging in which they are shipped in from the facilities.

(x) Any other relevant factors.

- At present, other relevant factors in regards to the minimization of exposure to potential hazards have yet to be identified. In the event such factors are identified in the future, such considerations shall be included in the “**Performance Review Report**” under the section titled “**Hazardous Waste Management Log**”.

## ***Hazardous Waste Management Plan***

The following section describes the measures taken to ensure compliance with the Department of Toxic Substances Control (DTSC), CalEPA and federal EPA guidelines for hazardous waste management.

(i) a. RCRA hazardous waste type / estimated amount in pounds (lbs.) generated per year:

- N/A / zero (0).

b. Non-RCRA hazardous waste type / estimated amount in pounds (lbs.) generated per year:

- N/A / zero (0).

c. Universal waste type / estimated amount in pounds (lbs.) generated per year:

- AA, AAA, 9V lead acid batteries / 10 lbs.

(ii) The following is a list of containers that shall be implemented for potentially hazardous materials (Container Type / Dimensions / Contents):

- Two (2) 10,000 gallon water storage containers / 141" Wx160" H / non-potable water;
- Two (3) 55 gallon plastic drums / 22.5"W x 33.5"H / liquid fertilizer (OMRI);
- One (1) two cubic yard dumpster / 72"L x 36"D x 48"H / solid waste;
- One (1) two cubic yard dumpster / 72"Lx36"Dx48"H / compostable waste, i.e. cannabis vegetative material and growing medium;
- One (1) recycling carts / 24"L x 28"W x 54"H, / recyclable waste;
- One (1) EPA-approved hazardous materials storage container (steel drum) / 32"W x 48"H / hazardous waste materials.
- One (1) fire-rated chemical storage cabinets / 24"L x 36"W x 60"H / agricultural chemicals (approved pesticides).

All containers shall be routinely inspected for damage, cracks or leaks. Repairs and/or replacement of damaged containers shall be administered as necessary.

(iii) Chemicals shall be stored in locations and segregation procedures shall be maintained that meet the requirements set forth in California Code of Regulations, as well as the orders, reg-

ulations and procedure set forth by CalEPA and the Department of Toxic Substances Control (DTSC).

Agricultural chemicals shall be stored in fire-rated cabinets located in enclosed restricted access areas. Locations of agricultural chemicals and fertilizer storage are identified on the document titled “**Sheet 5. Cannabis Cultivation Site**”. Chemicals in the form of conventional sanitation products shall be stored in enclosed cabinets, and shall be physically segregated from agricultural chemicals or other hazardous materials. Chemicals shall be kept in the original packages or containers as originally shipped from manufacturers. All MSDS (SDS) and label instructions shall be maintained in order to provide appropriate chemical segregation.

(iv) The Environmental Protection Agency’s (EPA) “**Uniform Hazardous Waste Manifest**” (EPA Form 9700-22), and if necessary, the continuation sheet (EPA Form 8700-22A) shall be completed for both interstate and intrastate transportation of hazardous materials, and shall meet all of the additional requirements as set forth by CalEPA and the DTSC, including the addition of California Waste Codes.

Manifests shall be mailed to:

*DTSC Generator Manifests*

*P.O. Box 400 Sacramento, CA 95812-0400*

Chemical spills or leaks shall be recorded in the “**Performance Review Report**” under the sections titled “**Hazardous Waste Management Log**”, or as otherwise required by local, state, and federal regulations.

(v) The following is an outline of employee duties as they relate to the proper inspection of potential hazardous conditions:

- inspect the packaging of chemicals as shipments are received, identifying and reporting of any rips, tears, or other damage;
- inspect areas used for chemical storage and report potential leaks or spills;
- record of all chemical shipments shall be recorded in the “**Performance Review Report**” under the section titled “**Chemical Shipping/Receiving Log**”;

(vi) In the event of a chemical spill or explosion, the following emergency spill response procedures shall be implemented:

- Personnel shall immediately report to the manager on duty any significant hazardous material release or spill that causes a film or sheen on the water’s surface, leaves a sludge or emulsion beneath the water’s surface, or a release or threatened release of a hazardous material that may potentially discharge to waters of the state, to the California Office of Emergency Services at

**(800) 852-7550** and the local Unified Program Agency. The manager on duty shall also immediately notify the appropriate Regional Water Board and CDFW of the release;

- Evacuation of personnel from the immediate area of the spill;
- Identify the spilled material(s) and containment of the spill;
- Notification to the manager on duty, or other spill response team as designated;
- Barricading of the spill area and notifying others in the surrounding areas;
- Extinguishing or disconnecting of all sources of ignition and contacting the local fire department if the chemical is believed to be flammable;
- Usage of appropriate personal protective equipment;
- Cleaning of the spill with the appropriate sorbents, if allowed and applicable;
- Disposing of the spill in accordance with local, state, and federal regulations.

The requirements contained within the Hazardous Waste Operations and Emergency Response Standard (HazWOPER) for cleanup operations; corrective actions involving cleanup operations; voluntary cleanup operations; and emergency response operations for hazardous waste shall be followed at all times.

Before operations commence, a spill containment program, which shall be included in the company's safety and health program, shall be implemented to contain and isolate the entire volume of the hazardous substance being transferred.

(vii) Personnel are responsible for identifying and reporting any incident of chemical spill or leak, including identifying and reporting any damaged chemical storage container. The manager on duty shall immediately report any significant hazardous material release or spill to California Office of Emergency Services at **(800) 852-7550** and the local Unified Program Agency. Depending on the nature of the spill, for instance if the spill causes a film or sheen on the water's surface, leaves a sludge or emulsion beneath the water's surface, or a release or threatened release of a hazardous material that may potentially discharge to waters of the state, then personnel shall notify the appropriate Regional Water Board and CDFW of the release.

Additionally, in certain cases personnel may also be required to perform emergency spill response procedures as described above.

(viii) Personnel shall be trained in accordance to best management practices (BMPs), principles and guidelines set forth by CalEPA, the Department of Toxic Substances Control (DTSC), and the State Water Resource Control Board's (SWRCB) "**Cannabis Cultivation Policy: Principles and Guidelines for Cannabis Cultivation**". All personnel involved with the receiving of

supply shipments shall be trained to quarantine all deliveries of chemicals in a designated quarantine area. Owner-operators shall inspect the packaging of subject chemical deliveries for any rips, tears, or other damage. If the chemical's packaging is damaged, the product shall remain quarantined until it is returned to the supplier.

(ix) It is not foreseen that cultivation activities shall generate any amount of hazardous waste. Regardless, in the event of a chemical spill, management shall immediately report any significant hazardous material release or spill that causes a film or sheen on the water's surface, leaves a sludge or emulsion beneath the water's surface, or a release or threatened release of a hazardous material that may potentially discharge to waters of the state, to the California Office of Emergency Services and the local Unified Program Agency, as well as the the appropriate state or regional Water Board and the CDFW.

Any portion of hazardous materials that is generate shall be properly stored in a designed hazardous materials and waste receptacle. The total amount of hazardous materials and waste generated measured in pounds (lbs.) shall be documented and recorded in the "**Performance Review Report**" under the section titled "**Waste Management Log**". All hazardous materials and waste generated on site shall be transported and disposed of at the Quackenbush Mountain Recovery & Compost Facility, located at 16520 Davis Street Clearlake, California 95422, or C&S Waste Solutions, located at 230 Soda Bay Road Lakeport, California 95453.

(x) In order to meet the requirements of this section, please see the attachment titled "**Sheet 3. Site Plan, Existing Conditions**", which identifies any private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record or within 100 feet of the lot of record and a 100 foot setback from any identified private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool, as applicable. Note: There are no public water supply wells on the lot of record or within 200 feet of the lot of record and a 200 foot setback from any public water supply well.

It is not anticipated that the cultivation process will create any quantity of hazardous waste materials, especially quantities that may exceed the threshold allowed under State law.

Except as allowed and authorized under the "**State Water Resource Control Board Cannabis Cultivation Policy**", the following shall not be discharged:

1. Irrigation runoff, tailwater, sediment, plant waste, or chemicals to surface water or via surface runoff;
2. Waste classified as hazardous (California Code of Regulations, title 23, section 2521(a)) or defined as a designated waste (Water Code section 13173); or
3. Waste in violation of, or in a manner inconsistent with, the appropriate Water Quality Control Plan(s).

## ***Cannabis Vegetative Material Waste Management***

The following chapter describes the cannabis vegetative material waste management plan:.

- Listed below are the three main categories of compostable cannabis vegetative waste that will be generated onsite, as well the anticipated total amount, in pounds (lbs.), of waste that will be generated on an annual basis:
  - Type: Stem and rootstock / Amount: 300;
  - Type: Leaf / Amount: 100;
  - Type: Flower / Amount: 100 .
- The permittee shall minimize cannabis vegetative waste generation through the implementation of a combination of practices, including:
  - Properly maintaining sanitary conditions in order to reduce plant disease and pest issues, resulting in reduced cannabis vegetative waste material;
  - Implementation of integrated pest management (IPM) practices which further reduce defects;
  - Specific pruning techniques which minimize the total waste material generated by plants;
  - Minimizing the amount of time plants are allowed to vegetate, thereby focusing most of the plant's energy on producing flowers, which in turn reduces the amount of stem, rootstock, and leaf material generated over the course of its life-cycle.
- Solid cannabis vegetative waste shall be mixed with used plant medium (coco-coir/peat mix) and stored in lockable waste containers (green waste dumpster). The resulting aggregate contains nearly zero desirable plant material, and is not easily identifiable as cannabis. Cannabis vegetative waste material shall be transported to the appropriate waste management / recycling facility in a fashion as approved by local and state guidelines. This aggregate is 100% compostable organic material.
- The total amount of cannabis vegetative waste that is generated on site, the amount that is recycled, and the amount and place of disposal are all monitored and recorded within the section titled “**Waste Management Log**”, located in the “**Performance Review Report**”. All waste produced onsite shall be weighed with a calibrated hand-held scale, and that amount shall be recorded at the time of transfer.

## ***Growing Medium Management***

The following chapter describes to type and amount of growing that shall be used as well as management practices for proper storage and disposal.

- The type of new growing medium that will be used for operations consists of a coco-coir/peat mix. The anticipated amount of new growing medium required for propagation is not expected to exceed 40,000 gallons per year.
- Growing medium used in operations is 100% compostable and reusable.
- Growing medium waste generation shall be additionally minimized by planting vegetative plants directly into the topsoil.
- Spent growing medium that may not be reused may be blended with cannabis vegetative material or composted.
- The total amount of growing medium that is generated on site is monitored by calculating the volume in cubic feet of each pickup and recorded in the “**Performance Review Report**” under the section titled “**Waste Management Log**”. Any excess spent growing medium or composted cannabis vegetative plant waste aggregate shall be disposed of at the *Quackenbush Mountain Recovery & Compost Facility, located at 16520 Davis Street Lakeport, California 95422*. Nearly one hundred percent of the growing medium is recyclable or compostable.

## ***Water Resources***

This chapter describes the considerations taken in order to minimize the adverse impacts due to production

- a. There are two major sources of surface water resources located on the lot of record where the permitted activity is located. Locations of both surface and groundwater resources are identified on the document titled “**Sheet 3. Site Plan, Existing Conditions**”.
- b. The project site is located in the Lake County Watershed Protection District, Monitoring Entity: *5181*;

Ground Water Basin Name: *Upper Lake Valley, GW Basin # 5-13.*

- c. In order to minimize adverse impacts on the surface and groundwater resources, the following protocols shall be implemented:
  - Storage of all chemicals, fertilizer, pesticides, and other hazardous materials in areas that prevent contamination of surface or groundwater resources in the event of the a spill or leak.
  - Implementation of a drip irrigation system and dry farming techniques in order to minimize contaminant run-off.
  - Black water storage/above ground septic system with periodic waste removal by a state licensed sewage/waste water hauling company.
- d. The total amount of water used from the production well shall be measured by a flow meter. A monitoring well within the cone of influence of the production well. Record of total volume of water used in production as well as the depth of the water table shall be recorded on an annual basis, or as otherwise required by law, in the “**Performance Review Report**” under the section titled “**Water Usage Log**”.
- e. In order to meet the requirements of this section, please see the attachment titled “**Sheet 3. Site Plan, Existing Conditions**”
- f. In order to meet the requirements of this section, please see the attached topographic map titled “**Sheet 9. USGS Topographical Map**”.



## ***Water Use***

This chapter describes the considerations taken in order to minimize the use of water and ensure that water is obtained and used by legal means.

(a) The water source that shall be used for the proposed activities for this Major Use Permit is of a legal source, and has been permitted by the County of Lake for use in agricultural operations. Further, a “Notice of Applicability” (“**CVRQCB Notice of Applicability WQ-2017-0023-DWQ (WDID 5S17CC401681)**”) has been received and enrollment with the State Water Resource Control Board’s General Plan has been completed for this project. The legal groundwater source meets all local, state and federal requirements, as well as meeting the criteria for exemption. The legal groundwater source is not shared with any other operator, and shall be used exclusively for the proposed operations described in this permit application.

(b) The proposed activities described herein shall not engage in the unlawful or un-permitted drawing of surface water under any circumstance.

(c) The proposed activities described herein shall not use water provided provided by a public water supply, unlawful water diversion, transported by a water hauler, bottled water, a water-vending machine, or a retail water facility.

(d) The well intended for use is located on the premises and lot of record. The production well shall have a flow meter installed in order to measure the amount of water pumped. Measurements shall be recorded on an annual basis, or as otherwise required by law, in the “**Performance Review Report**” under the section titled “**Water Usage Log**”. These records shall be maintained for a minimum of seven (7) years, or as otherwise required by law, and shall be provided to the County of Lake on an annual basis, or as as otherwise required by law.

(e) In the event an emergency water source is required, such as that provided by a licensed retail water supplier as defined in Section 13575 of the Water Code, the applicant shall notify the Department within seven (7) days of the emergency and provide the following information:

- a. A description of the emergency.
  - b. Identification of the retail water supplier including license number.
  - c. The volume of water supplied.
  - d. Actions taken to prevent the emergency in the future.
- All water intended for commercial use is sourced from a permitted on-site production well. The well is located next to the pump house on the premises, and is identified on the map titled “**Sheet 3. Site Plan, Existing Conditions**”. A recent well test shows the capacity of the well is a minimum fifteen (15) gallons per minute (GPM), with no change

on the water level. Please see the attached document “**Well Permit**” for verification that the well is a permitted and legal water source. The production well meets the definition of a ground-water source according to the State Water Resource Control Board, and does not divert water from nearby creeks or streams.

- The proposed irrigation system consists of water storage tanks. These tanks are attached to an irrigation pump that feeds the water along a PVC pipe to a series of secondary plastic irrigation lines. A secondary pump is used to provide irrigation to a multi-zone system delivering the nutrient solution through a series of PVC pipe and polyurethane/vinyl tubing. Drip-emitters provide precision irrigation to individual plants in order to minimize run-off which may lead to potential ground water contamination, as well as reduce total water usage.
- The annual amount of water required for irrigation for commercial use is estimated to be between two-hundred thousand (200,000) to two-hundred and fifty thousand (250,000) gallons per year, and shall be drawn from the permitted well onsite.

The total amount of water required for all other uses is estimated to be three-hundred (300) gallons per month on average.

- The proposed irrigation system shall comply with all of the requirements listed in the Model Water Efficient Landscape Ordinance as well as the manufacturers’ recommendations. The irrigation system and its related components shall be planned and designed to allow for proper installation, management, and maintenance. The following is a calculation provided in order to ensure irrigation system efficiency, using the formulas provided in the SWRCB’s Model Water Efficient Landscape Ordinance (MWELo):

Estimated Total Water Usage:

$$ETWU = (42.8)(0.62)((0.8 \times 7,000)/0.71 + 0)$$

$$ETWU = 235,460 \text{ gallons per year}$$

Maximum Allowed Water Usage:

$$MAWA = (42.8)(0.62)[(0.7 \times 30,000) + (.3 \times 0)]$$

$$MAWA = 557,256 \text{ gallons per year}$$

- A flow meter shall be installed on the permitted well in order to measure and monitor the total amount of water used for commercial cannabis cultivation. Readings shall be recorded on an annual basis, or more frequently as required by law, under the section titled “**Water Use Log**”, located in the company’s “**Performance Review Report**”. These records shall be maintained for a period of seven (7) years, or otherwise as required by law.

— END —