

**PROPERTY  
MANAGEMENT PLAN  
FOR: 25432 JERUSALEM  
GRADE, LOWER LAKE,  
CALIFORNIA**

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## **I. Project Introduction**

Pursuant to the Lake County Zoning Ordinance (Lake County Ordinances #3703 & 3084), Bridget King and Jerusalem Gold (a California corporation), submit a Major Use Permit application for approval of plans for the development and operation of a A- Type Class 3 outdoor cultivation site.

The proposed location is at 25432 Jerusalem Grade, Lower Lake, California and consists of four (4) contiguous parcels under the same ownership. They are further described as APN 013-01-725; 013-01-726; 013-01-727; and 013-01-728 . The site is a 65,000 square foot cannabis cultivation area within a 42,000 square foot canopy area (“the Jerusalem Grade Site”). The site is a 40-acre rural parcel that contains only a prefabricated single-family dwelling and is generally vacant except for some minor agricultural cultivation. The site is bounded on all sides by vacant rural land and 3 of the four adjoining properties are owned by the federal Bureau of Land Management (“BLM”). The site is accessed by a dirt driveway off of Jerusalem Grade.

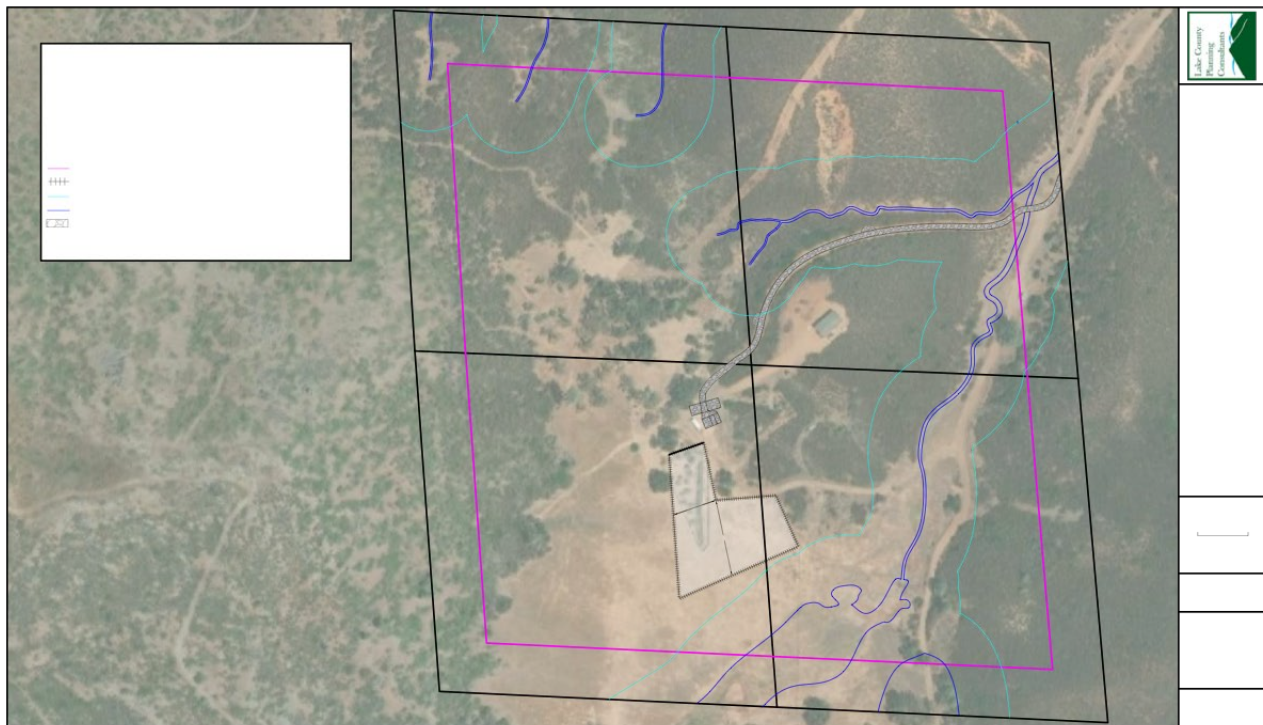
The JG cannabis cultivation facilities will be developed and operated within a 42,000 square foot fenced enclosure as depicted on the attached site plans. The cannabis cultivation facilities will be set back over 300’ from the adjoining property lines. Setbacks from all property lines will be maintained. A 6’ tall chain-link fence with site obscuring slats will form the cultivation area perimeter enclosure.

Access to the cultivation facilities will be provided on a 12’ wide base gravel/base rock driveway following the alignment of an existing driveway extending northward from the house area. This driveway will run through existing pasture to the existing pumphouse/well and a new parking area.

Three parking spaces will be provided just outside the fenced area, including two standard parking spaces and one handicapped accessible parking space.

Employees parking outside the perimeter fence will access the cultivation facilities enclosure through the keypad controlled, 12-foot wide chain-link gate or the 6-foot wide pedestrian gate.

## **II. Project Depiction**



## II. Regulatory Framework - Generally

People have exploited cannabis for thousands of years and its medicinal use can be traced as far back as at least as 400 A.D. But, like other recreational drugs, it started to face restrictions during the first half of the 20<sup>th</sup> century. Fear-mongering was common. A turning point came in the 1900s when John Warnock, a British expatriate doctor in Egypt, suggested that cannabis was responsible for a large amount of the insanity and crime in that country. When the League of Nations met in 1924 to discuss narcotics such as opium and heroin, his ‘evidence’ of the dangers of cannabis was influential. But his methodology was dubious. Data was gathered only from patients in the Egyptian Department of Lunacy. The doctor spoke no Arabic, and an important way to determine if patients had been users was to note their ‘excited’ denials when asked if they had tried the drug.<sup>1</sup>

Then in the 1930s America was afflicted with a moral panic, as cannabis was accused of inciting violence among Mexican immigrants and of corrupting America’s children<sup>2</sup>.

<sup>1</sup>See ‘Going to Pot’; The Economist, August 31, 2019, p. 45.

<sup>2</sup> See Footnote 1, above.

The Federal government sought to make marijuana contraband in 1937,<sup>3</sup> effectively prohibiting cannabis at the federal level. Although medical use was still permitted, new fees and regulatory requirements significantly curtail its use. The Federal Controlled Substances Act was enacted in 1970; classifying cannabis as a Schedule I drug, determined to have a high potential for abuse and no accepted medical use, thereby prohibiting its use for any purpose.<sup>4</sup>

The cultivation and consumption of cannabis was declared illegal in California in 1913.

The State and Federal prohibitions did little to curtail the recreational use of cannabis. During the 1960s and later pressure mounted first to decriminalize marijuana; then allow its medical use; and finally to make it legal for commercial purposes.

The Legislature of the State of California in an enlightened political action and in response to the will of the people through referendums in 2015 enacted Assembly Bill 243, Assembly Bill 266 and Senate Bill 643 collectively as the Medical Marijuana Regulation and Safety Act (MMRSA), later changed to Medical Cannabis Regulation and Safety Act (MCRSA).<sup>5</sup>

The intent of MCRSA was to provide a regulatory structure for the cultivation, manufacture, testing, distribution, and sale of medical cannabis to support the voter approved Propositions 215 (1996) and 420 (2004) regarding medical cannabis usage by patients.

The use of medical marijuana was so successful that in 2016, voters approved Proposition 64, The Adult Use of Marijuana Act (AUMA), allowing adults 21 years and older to possess up to one ounce of cannabis and cultivate up to six plants for personal use, and regulate and tax the production, manufacture, and sale of cannabis for adult use.

This legislation was signed by Governor Brown in June 2017 and it is the primary piece of legislation that establishes the State of California's regulatory program for cannabis.

The State of California then followed suit and enacted statutory reforms<sup>6</sup> that now allow cities and counties to enact and enforce reasonable regulations to reasonably regulate the cultivation, harvest, drying, processing, transportation, purchase, possession, smoking, ingesting, obtaining and giving away cannabis, including concentrated cannabis and cannabis products.

The California Department of Food and Agriculture (CDFA) has responsibility for the licensing and regulating commercial cannabis cultivators and has established the CalCannabis Cultivation Licensing Division. CalCannabis manages the state's track-and trace system, which tracks all commercial cannabis and cannabis products from cultivation to sale. In addition to a County permit, a State license is required to cultivate cannabis commercially in Lake County.

The Bureau of Cannabis Control is responsible for regulating commercial cannabis licenses for retailers, distributors, microbusinesses, testing laboratories, and temporary cannabis events.

The County of Lake has adopted such regulations, and these are discussed more fully, *infra*.

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<sup>3</sup> *Marihuana* [sic] Tax Act of 1937, Pub.L. 75–238, 50 Stat. 551, enacted August 2, 1937

<sup>4</sup> Pub.L. 91–513, 84 Stat. 1236, enacted October 27, 1970, codified at 21 U.S.C. § 801 et. seq.

<sup>5</sup> California became the first state to legalize medical cannabis with the approval of Proposition 215.

<sup>6</sup> Health and Safety Code, § 11362.2

The same statutes<sup>7</sup> allow for cities and counties to completely prohibit persons from engaging in the above listed actions and conduct outdoors upon the grounds of a private residence house, apartment unit, mobile home, or similar dwelling); until such time as the California Attorney General determines that nonmedical use of cannabis is lawful in the State of California under federal law.

The County of Lake defines “cannabis” as all parts of the plant *Cannabis sativa* (Linnaeus), *Cannabis indica*, or *Cannabis ruderalis*, or any hybrid thereof, whether growing or not; the seeds thereof; the resin, whether crude or purified, extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds, or resin. “Cannabis” also means the separated resin, whether crude or purified, obtained from cannabis. “Cannabis” does not include the mature stalks of the plant, fiber produced from the stalks, oil or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture, or preparation of the mature stalks (except the resin extracted therefrom), fiber, oil, or cake, or the sterilized seed of the plant which is incapable of germination. For the purpose of this division, “cannabis” does not mean “industrial hemp”<sup>8</sup> (see Lake County Code, Chapter 21 § 27.3(z)(ii)).

The Federal government does not agree with the State of California. Federal Controlled Substances Act,<sup>9</sup> classifies cannabis as a Schedule I Drug, which is defined as a drug or other substance that has a high potential for abuse, that has no currently accepted medical use in treatment in the United States, and that has not been accepted as safe for use under medical supervision. The Federal Controlled Substances Act makes it unlawful, under federal law, for any person to cultivate, manufacture, distribute or dispense, or possess with intent to manufacture, distribute or dispense, cannabis. The Federal Controlled Substances Act contains no exemption for the cultivation, manufacture, distribution, dispensation, or possession of marijuana for medical purposes.<sup>10</sup>

Lake County has geographic and climatic conditions, along with the sparse population in many areas of the County provide conditions that are favorable to outdoor cannabis cultivation, and the County has experienced a significant increase in the number of people in the County cultivating large amounts of cannabis. Cannabis growers can achieve a high per-plant yield because of the Lake County’s favorable growing conditions. With the use of custom soils and fertilizers, it is not uncommon for plants to grow up to 12 feet in height, six feet in diameter and produce between two (2) to seven (7) pounds of dried *bud*.

Many if these seasonal growers are unfortunately unfamiliar with local and state regulations aimed at protecting the environment and are causing significant damage to area watersheds. Soils, fertilizers and pesticides are commonly left behind as sites are abandoned for the winter after the end of the customary outdoor cannabis cultivation season.

The current state legislation (MAUCRSA) creates a comprehensive state licensing system for the commercial cultivation, manufacture, transport, testing, distribution, retail sale and delivery of

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<sup>7</sup> Health and Safety Code § 11362.2

<sup>8</sup> Section 11018.5 of the Health and Safety Code provides a legal definition of “Hemp”.

<sup>9</sup> 21 U.S.C. §§ 801 et seq.

<sup>10</sup> 21 U.S.C. §§ 801 et seq.

medical and adult-use cannabis. Local permits for these activities is required in order to obtain a state license.

The unregulated cultivation of cannabis in the unincorporated area of Lake County can adversely affect the health, safety, and well-being of the County, its residents and environment. Lake County has enacted comprehensive civil regulations of premises used for cannabis cultivation in order to avoid the risks of violent criminal activity, degradation of the natural environment, malodorous smells, undesired impacts to neighboring parcels, and indoor electrical fire hazards that may result from unregulated cannabis cultivation, and that are especially significant if the amount of cannabis cultivated on a single premises and is not regulated.

The County has passed these regulations because cannabis cultivation near churches, parks, child care centers, or youth oriented facilities creates unique risks that the cannabis plants and products may be observed by children, and therefore be especially vulnerable to theft for recreational consumption by children and the potential for criminal activities associated with cannabis cultivation in such locations poses heightened risks that children will be involved or endangered; therefore, cultivation and sales of any amount of cannabis in such locations or premises is especially hazardous to public safety and welfare, and to the protection of minors. The County believes that well organized and well-regulated cannabis cultivation will help to eliminate the issues and problems caused by illegal cultivation. The County has also observed that according to law enforcement officials, the amount of cannabis cultivated in Lake County has increased significantly with each growing season and is increasingly occurring in residential areas, in close proximity to residences, and on vacant, unsupervised and unsecured properties. During the last three years, Lake County has experienced an ongoing large number of complaints regarding the odor, threats to public safety and other nuisances that unregulated cannabis cultivation sites can create. The unregulated use of Pesticide managements, pesticides and fertilizers has the potential to contaminate or otherwise damage adjacent property and waterways. This poses a threat not only to the users of the cannabis, but to consumers of agricultural crops grown in proximity to cannabis. These threats and problems will be addressed and countered by the regulatory framework adopted by the County.

The unregulated cultivation of cannabis has the potential for increased crime, intimidation and threats and as cannabis plants mature, certain varieties produce a strong odor which creates an attractive nuisance by alerting people to the location of valuable cannabis plants; this creates an increased risk of crimes including burglary, trespassing, robbery and armed robbery. Lake County has experienced a significant increase in reported home invasion robberies, and it is believed that more incidents go unreported due to the criminal nature of many cultivation operations. Well-secured and well-controlled legal cannabis cultivation operations will counter these problems.

Indoor cultivation of cannabis often results in excessive use of electricity, which may overload standard electrical systems creating an unreasonable risk of fire. This cultivation, as well as the illegal manufacturing of cannabis with the use of volatile chemicals has caused extensive damage to homes, as well as pose a serious public health and safety threat. The control of legal cannabis cultivation will reduce these risks.

The California Attorney General's August 2008 Guidelines for the Security and Non-Diversion of Cannabis Grown for Medical Use, the cultivation or other concentration of cannabis in any location or premises without adequate security increases the risk that surrounding homes or

businesses may be negatively impacted by nuisance activity such as loitering or crime. The County therefore recognizes that standards are necessary to protect adjacent property owners and residents; and to incompatible uses on residential, agricultural and commercial lots and protect the public safety and welfare. The County has therefore adopted necessary regulations to limit and possibly eliminate these problems and concerns.

### **III. Regulatory Framework – Lake County**

Lake County's regulations regarding the commercial cultivation of cannabis are found in Chapter 21, Article 27 of the Lake County Code (the Zoning Ordinance).

The County's original cannabis cultivation laws were found in Article 72 of the Lake County Zoning Ordinance and were adopted on December 17, 2013 addressing the regulation of cannabis cultivation for qualifying medical patients, primary caregivers, and collectives.

On March 20, 2018, the Board of Supervisors adopted Ordinance No. 3073, an amendment to Article 27 of the Zoning Ordinance, creating a regulatory program for adult cannabis use, qualifying patients, primary caregiver cannabis cultivation, and commercial cannabis cultivation. This Ordinance was subsequently amended by Ordinance Number 3084 in May 2019.

Cannabis cultivation area is defined by the County of Lake as an area of a cannabis cultivation site where cannabis is planted, grown, harvested, dried, cured, graded, packaged, stored, or trimmed, or that does all or any combination of those activities.

The Lake County Cannabis Cultivation requires, in addition to the approval of a Major Use Permit, an extensive amount of detail and information regarding proposed cannabis cultivation projects.

This Property Management Plan provides operational information and site design parameters in compliance with Lake County Code Chapter 21, Article 23.

According to the County Ordinance all applicants must prepare a Property Management Plan. The intent of this 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 will be managed in the future.

The Property Management Plan must demonstrate how the operation of the commercial cannabis cultivation site will minimize harm the public health, safety, and welfare or the natural environment of Lake County.

The basic Zoning standards for cultivation permit requires:

- a 20-acre minimum lot size;
- 100' setbacks from property;
- a 200' setback from adjacent residences;
- a minimum perimeter fence height of 6'; and
- a maximum cultivation area of 43,560 square feet per parcel.



The general plan states that one purpose of this land use category (agriculture) is to protect the County's valuable agricultural resources and to prevent development that would preclude the future use in agriculture. These lands are actively or potentially engaged in crop production, including horticulture, tree crops, row and field crops, and related activities. Wineries and the processing of local agricultural products such as pears and walnuts are encouraged within this designation. These lands also provide important groundwater recharge functions. As watershed lands, these lands function to collect precipitation and provide for important filtering of water to improve water quality. They generally support the management of natural infrastructure of the watersheds (see general plan, goal AR-1).

A single applicant or permit holder is limited to four permits and a single parcel may support up to four cultivation sites (permits), subject to the minimum density standards.

For all Type 3 State licenses, Lake County has adopted the following standards:

- Enrollment in the applicable Regional Water Quality Control Board or State Water Resources Control Board;
- Complete a pre-application conference and achieve a minimum score of 75% on performance standards;
- A location within an APZ - Agriculture Preserve Zone, A – Agriculture Zone, TPZ - Timber Preserve Zone, RL - Rural Lands Zone, RR - Rural Residential Zone, or SR - Suburban Reserve Zone;
- Not located within a cannabis cultivation exclusion zone; and
- Apply for Use permit and obtain Planning Commission approval.

The Duration of a Use Permit up to ten (10) years.

## **IV. Requirements for Property Management Plan**

### **a. General Requirements for Property Management Plan**

County code requires that all applicants for a cultivation permit prepare a *Property Management Plan*. The intent of this plan is to identify and locate all existing cannabis and non-cannabis related uses on a property for which an application is sought. It is also intended to identify and locate all proposed cannabis and non-cannabis related uses on the property and describe how all cannabis and non-cannabis related uses will be managed in the future. The property management plan shall demonstrate how the operation of the commercial cannabis cultivation site will not harm the public health, safety, and welfare or the natural environment of Lake County.

The plan must consist of the following sections: (i): Air Quality; (ii): Cultural Resources; (iii): Energy Usage; (iv): Fertilizer Usage; (v): Fish and Wildlife Protection; (vi): Operations Manual; (vii): Pest Management; (viii): Security; (ix): Storm Water Management; (x): Waste Management; and (xi): Water Resources – Adverse Impacts; and (xii): Water Resources – Conservation (see Lake County Code, Article 21 § 21-27.3).

### **b. Specific Requirements for Property Management Plan**

## 1) Air Quality

**Intent: Cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District (LCAQMD).**

The proposed Jerusalem Grade cultivation site is within the Lake County Air Basin. The Lake County Air Quality Management District (LCAQMD) regulates air quality in Lake County. Lake County meets the U.S. Environmental Protection Agency standards for five of seven air pollutants: carbon monoxide; nitrogen dioxide; sulfur dioxide; lead; and coarse particulates. Lake County is a part of a regional non-attainment area for ground-level ozone and fine particulate pollution.

The construction and operation of the proposed Jerusalem Grade site cultivation facilities will not cause the issuance of significant air contaminants. Short-term construction activities could generate minor amounts of fugitive dust and other particulate matter, or exhaust emissions from operation of tractors and trucks during site preparation. Operation of the proposed cultivation operation would generate small amounts of carbon dioxide from operation of the water heater, heaters, air circulation fans, small engines, and from vehicular traffic associated with cultivation/processing activities and employee commuting. The generation of carbon dioxide would be minor and would likely be partially offset by the cultivation of fast-growing plants, which remove carbon dioxide through photosynthesis. The proposed cultivation operations would not consume excessive amounts of energy because it is an open-air operation and uses natural sunlight.

The State of California through the CDFA (2017) has concluded that cannabis cultivation activities under the CalCannabis Licensing Program would not generate a substantial number of vehicle trips and would not require intensive use of heavy equipment, and as such, would not degrade air quality or produce significant amounts of greenhouse gasses.

The CDFA CalCannabis Program concluded that small cannabis cultivation operations would not contribute significantly to greenhouse gas emissions because of the limited use of combustion-powered equipment and vehicles and because County ordinances limit the use of generators to emergency-use only (CDFA 2017).

There are no sensitive air quality receptors in close proximity to the Jerusalem Grade cultivation site. The closest neighboring residence is over 1,000 feet away and there are no nearby public facilities such as schools and churches.

### ⇒ Lake County Air Quality Management District (LCAQMD) Permits

The Jerusalem Grade cultivation operation is not expected to generate significant quantities of air pollutants.

Lake County requires an Authority to Construct Permit pursuant to LCAQMD Rules and Regulations, if applicable, to operate any article, machine, equipment or other contrivance which causes or may cause the issuance of an air contaminant, prior to the construction.

The applicant, if necessary, will obtain and maintain an LCAQMD Authority to Construct Permit for the life of the project, until the operation is closed, and the cultivation facility is removed.

⇒ Dust Management Measures

Jerusalem Grade Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. The following are some of the mitigation measures and Best Management Practices (BMPs) that will be used to control dust: staff will be informed of speed limits and dust pollution; the roadways may be clearly marked for limited speed to control dust; dusty road segments can be armored with gravel or asphalt; and a road maintenance program can be implemented if necessary. Other dust management practices include: on tilled earth and stockpiles, fugitive dust can be controlled by wetting the soil with a mobile water tank and hose, or by delaying ground disturbing activities until site conditions are not windy; water applications may be concentrated during the late summer and early fall months, when soils have the lowest moisture content or when winds are severe. Other dust management BMPs will be employed as necessary:

- BMP WE-1: Wind Erosion Control
- Water Conservation Practices will be implemented to provide dust control and prevent discharges from dust control activities and water supply equipment. Water application rates will be minimized as necessary to prevent runoff and ponding and water equipment leaks will be repaired immediately. During windy conditions (forecast or actual wind conditions of 25 miles per hour or greater), dust control may be applied to disturbed areas, including haul roads, to adequately control wind erosion.

BMP Factsheet WM-3: Stockpile Management will be implemented using silt fences and plastic covers to prevent wind dispersal of sediment from stockpiles. The minimum amount of water should be used: refer to BMP Factsheet NS-1: Water Conservation Practices.

BMP Fact Sheets related to dust control are attached.

⇒ Cannabis Cultivation Odor Management

No volatile compounds will be used in the cannabis cultivation process. Some varieties of maturing cannabis plants produce odors which are considered by a few people to be objectionable. However, there is some disagreement as to the level of objectionable nuisance created by these odors.

The Jerusalem Grade cultivation facility will be located near the center of a large parcel and will conform to the Lake County Ordinances' setback requirements, which were designed to put substantial linear distances between grow sites and neighboring residences. Nuisance odors are effectively mitigated and reduced over long distances. The location of the cannabis cultivation facilities (more than 100 feet from property lines) is the project's primary odor management approach.

No significant odor impacts are anticipated from this cultivation operation, due to the limited population in the area, the small size of the cultivation operation, the extensive setbacks from roads/property lines/adjacent residences.

⇒ Odor Response Program

The Jerusalem Grade site Management Staff responsible for responding to odor complaints - 24 hours per day/seven (7) days a week, including holidays include:

Name	Title	Cell Phone	E-mail Address
Bridget King	Owner/President	(515) 988-3477	<a href="mailto:bridgetmarie00@gmail.com">bridgetmarie00@gmail.com</a>

Property owners and residents of property within a 1,000' radius of the cannabis cultivation site, if any, will be provided with the contact information of the individuals responsible for responding to odor complaints.

Cultivation staff will receive annual training on how to record and respond to odor complaints, including the deployment of odor management strategies.

⇒ Cultivation Facility Odor Complaint Protocol

Policies, procedures, and actions to be taken when an odor complaint is received:

Each odor complaint will be logged in a Master Log Book indicating:

- A. Time and date of complaint, and how it was received.
- B. Name of employee who has received complaint.
- C. Weather conditions at time of complaint, including prevailing wind direction.
- D. Specific nature of the odor complaint i.e. what does the complaint involve - strong odor, weak odor, intermittent odor, continuous odor, and other details, including a description of the type of odor (what does it smell like?).
- E. Name, address, phone number, of the complainant, including their location and estimated distance from the facilities.
- F. Action taken at the time of complaint including the name of the Manager that the complaint has been referred to and the results of any initial investigation that may have been conducted.
- G. Investigation of complaint – Management staff will investigate the complaint within 24 hours and determine the validity of it, including a determination as to any equipment or mechanical failures or issues, loss of power, operational issues, and or any other causes for the odor problem.

H. Report on odor complaint – the responsible Manager will issue a report on the complaint, file it in the complaint log book, and contact the complainant within five working days to report the reasons for the odor issues and the mitigation measures employed to respond to the odors.

I. The staff will review all odor complaints, responses and actions on a monthly basis and take follow up remedial actions as needed to reduce potential nuisance odor issues.

## 2) Cultural Resources

**Intent: Protect the cultural, historical, archaeological, and paleontological resources on the parcel where the permitted activity is located.**

The following protective measures and procedures are to be followed if cultural, historical, archaeological, and paleontological resources are found on the Jerusalem Grade property.

Protective measures for dealing with potential cultural resources on the site consist primarily of minimizing ground disturbance, especially in areas where there may be cultural resources. For this property, there have been no culturally significant or sensitive areas previously identified.

A key cultural resource policy measure is worker awareness training. During staff training events, workers will be made aware of the regulations protecting cultural resources, the location of any sensitive areas if known, and indicators of buried historic or archaeological resources or human remains, such as fragments of bone, shells, or pottery, unusual odors or staining of soil, building foundations, etc.

An Inadvertent Discovery Work Plan is generally required by the County for properties known to have cultural resources. No cultural resources are known to occur within, or adjacent to, the cultivation site fenced cultivation area. Nevertheless, Inadvertent Discovery Measures are provided below and will be implemented in the event of the discovery of cultural resources. The following has been taken directly from the California Department of Food and Agriculture's Program Environmental Impact Report (2017) prepared for the CalCannabis Cultivation Licensing program:

*“Existing cultivation activities themselves would generally have limited potential for adverse impacts on cultural resources. However, cultivation may involve excavation within soil that has not been disturbed previously. As such, while considered unlikely, excavation could encounter buried historic or archaeological resources or human remains. A mitigation measure—CR-1—was added that would ensure that any unexpected discoveries of cultural resources during cultivation do not result in significant impacts.*

*It is also considered unlikely that cultivation itself would result in modification or demolition of historic structures that could affect the characteristics that make the building eligible for listing in the CRHR; such impacts would be more likely to occur as part of site development and, as a result, would be evaluated by the local agency during its approval process for site development. In addition, the CalCannabis Licensing*

*Program's environmental protection measures related to cultural resources, specifically the accidental discovery of human remains (Section 8313[c] of the proposed regulations), would require applicants to halt cultivation activities and implement Health and Safety Code Section 7050.5 if human remains were discovered.....”.*

⇒ Inadvertent Cultural Resources Discovery Protocol

Suspend construction grubbing or trenching immediately if cultural resources are found. Evaluate all identified cultural resources for CRHR eligibility and implement appropriate mitigation measures for those eligible resources.

Not all cultural resources are visible on the ground surface. As a result, before initiation of ground-disturbing activities, arrange for cultivation employees to receive training about the kinds of archaeological materials that could be present at the cultivation site and the protocols to be followed should any such materials be uncovered during cultivation.

Training will be conducted by a land use planning CEQA professional. Training will be provided to new cultivation personnel.

If any cultural resources, including structural features, unusual amounts of bone or shell, flaked or ground stone artifacts, historic artifacts, human bones or remains, or architectural remains, are encountered during site preparation or cultivation activities, work shall be suspended immediately at the location of the discovery site and within a radius of at least 50 feet. The project manager of the site will be notified of the discovery and then the appropriate local responsible jurisdiction official will be contacted.

If the discovery of historic or culturally significant resources involves human remains or bones, the Lake County Sheriff/Coroner is to be contacted to investigate the discovery and determine the probable age and disposition. The Sheriff will either clear the discovery site for remediation or conduct further investigation.

All cultural resources uncovered during cultivation within the site shall be evaluated for eligibility for inclusion in CRHR. Resource evaluations shall be conducted by individuals who meet California professional standards in archaeology, history, or architectural history, as appropriate. If any of the resources meet the eligibility criteria identified in PRC Section 5024.1 or State CEQA Guidelines Section 21083.2(g), mitigation will be developed and implemented in accordance with State CEQA Guidelines Section 15126.4(b) before cultivation resumes.

For any resources eligible for listing in the CRHR that would be significantly adversely affected by cultivation, additional mitigation will be implemented. Mitigation measures for archaeological resources may include, but are not limited to, avoidance of the discovery site; incorporation of sites within parks, greenspace, or other open space; capping the site utilizing techniques and standards; deeding the site as a permanent conservation easement; or perform a recovery excavation.

Mitigation for discovered archaeological resources will be developed in consultation with responsible agencies and, as appropriate, with the nearby area Native American Tribe.

Implementation of the acceptable mitigation is required before resuming any cultivation activities with the potential to affect identified eligible resources at the site.

As required by California law, Lake County will consult with the nearby Native American area Tribe regarding the potential of such resources being located on the parcel. The County also has an agreement with Sonoma State University (SSU) for cultural resource record research and will refer the project to them. Based on the SSU referral, the CDD may recommend a cultural resource study of the property to determine the extent such resources exist on the lot of record.

A complete Cultural Resources Inventory for this project has also been conducted and the full report appears at Exhibit “7”

### 3) Energy Usage

<b>Intent: Minimize energy usage.</b>
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Lake County requires the provision of energy calculation as mandated by the California Building Code. All new buildings, alterations, additions and commercial buildings in California must comply with the Building Energy Efficiency Standards according to Title 24, Part 6 of California Code of Regulation. Jerusalem Gold energy compliance documentation will be developed and submitted to the Lake County Community Development Department - Building Division for plan check.

The cultivation project will use the performance approach pathway to compliance and will calculate energy usage and conservation measures pursuant to <http://www.energy.ca.gov/title24/orc/> and will also refer to the 2016 Building Energy Efficiency Standards for non-residential building. This method allows for energy tradeoffs between building systems and is considered to be more flexible. Plans and certificate of compliance forms will be prepared and submitted to the County Building Department for plan check.

A combination of the following energy conservation measures will be employed for the Jerusalem Grade cultivation operation:

- Use of passive solar energy techniques such as proper site selection and orientation.
- Use of LED lights or another high-efficiency lighting.
- Use of ambient light.
- Use of electric vehicles or bicycles for on-site transportation instead of combustion-powered vehicles, whenever possible.
- Use of hand tools instead of power tools.
- Use of energy efficient fans, heating and cooling systems, water heater and other equipment.
- A solar voltaic electrical power generation system and battery storage may be installed at some future date.
- Energy consumption will be monitored, and metered data stored. Energy consumption will be metered using electric meters for alternating current. Should solar power systems be used, energy use will be monitored by DC meters that measure power in ampere-hours. The meters may be included in the controllers / inverters that are part of the solar power system.

Energy conservation measures to be taken by the cultivation site are described above and will be maintained to assure compliance with CCR Title 3, Division 8, Chapter 1, Section 8305 the Renewable Energy Requirements.

#### 4) Fertilizer Usage

<b>Intent: Ensure consistency of fertilizer storage and use with the other sections of the Property Management Plan.</b>
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To comply with the Fertilizer Usage guidelines, the Jerusalem Grade cultivation site will implement the following:

- The minimum amount of fertilizer as determined after consultation with a Certified Crop Advisor will be stored on site.
- Fertilizer amounts will be determined as recommended by the Certified Crop Advisor and the required amount will be delivered to the facilities and stored only as necessary.
- Liquid or granular fertilizers will be mixed with water in a portable mixing tank will then be delivered by a hose to feed the water/fertilizer mixture to the plants.
- Fertilizers will be stored in a stormproof, designated material storage building or within the processing building. Fertilizers on shelves, will be properly labeled, and open containers will be sealed when stored.
- Personal protective equipment such as safety glasses, gloves, dust mask or respirator, boots, pants, and long-sleeved shirt will be used by staff when handling fertilizers and other chemicals. Pesticides and fertilizers will be handled and applied according to their labels and Safety Data Sheets (SDS) as well as recommendations made by the Pest Control Adviser (PCA) and/or Certified Crop Adviser (CCA). See Safety Data Sheets for specific information.

The following pesticide and fertilizer application and storage protocols will be implemented:

- Site personnel will be trained in accordance with California Department of Pesticide Regulations (CADPR) on how to read labels and SDSs prior to any product application and will comply with all label directions;
- Pesticides will be stored above ground level in a properly marked (Danger: Pesticides) secure building or shed to prevent unauthorized access or injury to wildlife or humans;
- Contain any chemical leaks and immediately clean up any spills as required by product labels or SDS;
- Apply the minimum amount of fertilizer in accordance with product labels and PCA/CCA recommendations;
- Prevent offsite drift;
- Do not apply insecticides toxic to bees when plants are flowering;
- Do not spray directly to surface water or allow chemical product to drift to surface water;



- A binder of current Safety Data Sheets for all fertilizers and other chemicals used by the site will be maintained and remain easily accessible to staff.

Jerusalem Grade Cultivation site management will likely consult with a certified professional to assist with these activities:

⇒ Monitoring Program

The monitoring program for fertilizers is incorporated into the Stormwater Monitoring Program. In general, the monitoring program consists of regular inspections of chemical storage areas, the immediate cleanup of spilled products, recordkeeping of quantities and types of fertilizers used, and employee training on chemical use and use of personal protective equipment.

A secure fertilizer storage building, and chemical storage area and weather proof storage building will be construed and maintained within the cultivation fence area.

There will be no cultivation operations within 100 feet of a stream, creek, lake, wetland, spring or vernal pool.

## 5) Fish and Wildlife Protection

<b>Intent: Minimize adverse impacts on fish and wildlife.</b>
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The Jerusalem Gold Area is located within the Inner North Coast Ranges geographic subregion, which is contained within the Northwestern California geographic subdivision of the larger California Floristic Province. This region has a Mediterranean-type climate, characterized by distinct seasons of warm, dry summers and wet, moderately-cold winters. The Study Area and vicinity is in climate Zone 7, California's Gray Pine Belt, with hot summers and mild but pronounced winters without severe cold or enervating humidity.

The topography of the Jerusalem Gold Area is variable with rolling hills, steep slopes and relatively flat valley floors. The elevation ranges from approximately 1,670 feet to 1,840 feet above mean sea level. The geology of this project is mapped as ultramafic. Ultramafic rock, and in particular serpentinite, is high in magnesium, iron, nickel, cobalt and chromium and low in nitrogen, potassium and phosphorus. Soils derived from serpentinite often support a high diversity of plant species.

Drainage runs northeast, and eventually flows into Jericho Creek. The surrounding land uses are private estates with gardens or corrals, open space, and grazing land. Agricultural areas consist of dry pasture and fallow fields. Vegetation within this habitat type consists primarily of bare areas or European pasture grasses and weeds.

The following animals can be found in the Area: fence lizard (*Sceloporus occidentalis*); moths and butterflies (Lepidoptera); bees (Apoidea); bumblebees (*Bombus*); dragonflies (Odonata); ants (Formicidae); grasshoppers (Orthoptera); Pacific chorus frog (*Pseudacris regilla*); desert cottontail (*Sylvilagus audubonii*); black-tailed jackrabbit (*Lepus californicus*); black-tailed deer (*Odocoileus hemionus columbianus*); dog (*Canis lupus familiaris*); coyote (*Canis latrans*);

Botta's pocket gopher (*Thomomys bottae*); California vole (*Microtus californicus*); California quail (*Callipepla californica*); Nuttall's woodpecker (*Picoides nuttallii*); California towhee (*Melospiza crissalis*); western meadowlark (*Sturnella neglecta*); California scrub jay (*Aphelocoma californica*); sparrows (*Passeridae*) and other common songbirds.

Implementation of the project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Implementation of the projects does not conflict with any county or municipal policies or ordinances protecting biological resources. No preserves or wildlife corridors need to be established for impact mitigation.

The Jerusalem Gold Area contains 3 terrestrial habitat types: blue oak woodland; chamise chaparral; and annual grassland. The blue oak woodland consists of blue oak and gray pine with a grassy understory and can be classified as the Holland Type "Blue Oak Woodland" or as "71.020.05 Blue oak/grass [*Quercus douglasii*-grass]". The chaparral community consists mostly of chamise with interior live oak, leather oak, mountain mahogany and toyon and can be classified as the Holland Type "Chamise chaparral" or as "37.101.15 Chamise serpentine [*Adenostoma fasciculatum* serpentine]". The annual grassland consists of a dense cover of non-native grasses including slender wild oat, medusa-head grass, vetch and annual rye-grass and can be classified as the Holland Type "Non-native grassland" or as "44.150.01 Wild oats grasslands – Seminal Stands [*Avena barbata*]". No terrestrial special-status habitats were detected within the Area.

The CNDDDB reported no special-status habitats within the Area. The CNDDDB reported 3 special status habitats in a 5-mile radius outside of the Study Area: Northern Basalt Flow Vernal pool, Northern Interior Cypress Forest, and Serpentine Grassland.

The development of the proposed project will not substantially interfere with fish or wildlife habitat, movements in the area or migratory patterns. Many portions of the site have been impacted by past uses including driveway development, the residence and related outbuildings and past agricultural activities.

There are no perennial surface waters at the project site, and therefore no habitat for native fish. A field investigation determined the unnamed, off-site tributary of Coyote Creek was an ephemeral stream. The proposed project will not conflict with County policies related to the protection of biological resources as no cannabis cultivation is proposed within any stream channels or in proximity to sensitive aquatic resources.

Impacts to the site's biological resources would be minimal. The Project site is not part of a Habitat Conservation Plan, Natural Community Conservation Plan or other habitat conservation plan.

No conservation easements are proposed. The site is not a known migratory corridor and the proposed project will not impact wildlife movements in the area as no corridors have been defined around the project.

The Department of Fish and Wildlife has already inspected the existing site and the proposed improvements, and the F&W officers found everything to be in good order.

A complete biological site assessment has been completed and the full report is attached as Exhibit “6”.

## **6) Operations Manual**

**Intent: Provide operating procedures of the commercial cannabis cultivation site to ensure compliance with the use permit, protect the public health, safety and welfare, as well as the natural environment of Lake County.**

The Jerusalem Grade cultivation site management will provide authorization for the County, its agents, and employees, to verify the information contained within the use permit application, the Operations Manual and Operating Standards, before or after the issuance of development or use permits.

### **⇒ Staff Screening Processes**

The cultivation site staff screening process will consist of requiring each employee to submit to a criminal report and background check conducted by the Lake County Sheriff.

The Jerusalem Grade cultivation site management will conduct in-person interviews and require each applicant to provide a comprehensive resume and contact information for all references.

All hiring practices will comply with Lake County’s adopted cannabis worker guidelines.

### **⇒ Operating Times and Personnel Needs**

The cultivation site facility will operate during normal business hours (7 a.m. to 7 p.m.) Monday through Saturday.

Security staff and equipment will function 24 hours per day, 7 days a week.

The cultivation facility may employ up to 6 people, with the following positions:

- 1 lead grower/cultivation facilities manager
- 4 or 5 seasonal trimmers/laborers

The Jerusalem Grade cultivation facility will be closed to the public. Visitation is only allowed when specific permission is granted. Individual Management staff identified as emergency contacts will stay on site in the existing residence or be present on an as needed basis.

### **⇒ Carbon Footprint Offsets**

Measures to be implemented to minimize or offset the carbon footprint from operational activities include:

- Use of energy-saving measures (see Energy Usage subsection)
- Use of water-saving measures (see Water Use subsection)
- Implementation of solid waste reduction measures (see Waste Management subsection)
- Implementation of air emissions reduction measures (see Air Quality Management subsection)

- Application of standard project design, site selection, minimal site grading and disturbance
- Cultivation of fast-growing plants, which tend to accelerate carbon dioxide usage thus reducing the carbon footprint
- Use of recycled products when feasible (office supplies, etc.).
- Discourage use of plastic/Styrofoam materials such as disposable water bottles, drink cups, plastic straws, plates and cutlery

⇒ Chemical Storage and Use

The description of chemicals stored and used, and any effluent discharge resulting from proposed operational activities is found in the Fertilizer subsection, the Pesticide subsection, the Hazardous Waste Management portion of the Waste Management subsection, and the Stormwater Management subsection.

⇒ Site Maintenance

The Jerusalem Grade cultivation site staff will implement a variety of procedures to ensure that the grounds are kept in a condition that prevents the contamination of components and cannabis products and ensure that good housekeeping activities are used:

- The grounds will be inspected at least once per day and any litter or debris will be picked up.
- Trash containers will be emptied when full.
- Roads will be maintained so that significant erosion does not occur, and the generation of dust is minimized. This will include placement of road base on the access driveway, wetting down of dusty sections, and maintenance of drainage culverts and drainage ditches.
- Weeds and grasses will be controlled by mulching or by cutting with a lawnmower or line trimmer.
- Drainage ditches and swales will be maintained with the removal of litter, debris, and sediment.
- Containers and ditches will be drained of rainwater to minimized mosquitos.
- Areas inside the cultivation compound will be provided with a gravel/road base surface.
- Live traps may be deployed to remove rodents from operational areas.
- Disposable coveralls (e.g. Tyvek) will be used to increase sanitation levels and reduce vectoring of mites and other pests.
- A locker room will be provided for employees so that street clothing is separated from cultivation clothing.

Property maintenance will also employ appropriate Best Management Practices. This Property Management Plan incorporates numerous CASQA Industrial and Commercial Handbook Best Management Practices which are attached hereto. These include:

- BG-40 Landscape Maintenance
- SC-41 Building & Grounds Maintenance
- SC-40: Contaminated or Erodible Areas
- SC-43 Parking Area Maintenance

- SC-44 Drainage System Maintenance

Operational waste will be managed as described in the Waste Management subsection.

The cannabis cultivation process will employ and require strict protocols for cleanliness, including requiring employees to:

- Suit up in clean over clothing before entry into the grow areas
- Frequent handwashing and use of sanitary wipes
- Use of bleach mats at entry points
- Wearing of clean suits, gloves, and other Personal Protective Equipment (PPE).

The site cultivation project will design and operate a waste treatment system that prevents contamination in areas where cannabis products may be exposed to such a system's waste or waste by-products.

#### ⇒ Cultivation Cycle Summary

Cannabis plants will be planted directly in the cultivation area. The plants will then germinate and grow. The juvenile cannabis plants will mature and flower over a 4-month period, after which they are harvested.

The harvested plants will be picked up immediately, "fresh frozen", by a licensed distributor/manufacturer in a refrigerated truck.

### 7) Pest Management

**Intent: To ensure consistency of pest management with the other sections of the Property Management Plan.**

The cultivation site will comply with all adopted pesticide application and storage protocols by employing the following practices:

- Site cultivation operations will comply 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.
- All pesticide label directions will be followed and adhered to.
- Any chemicals used in the operation of the cultivation facilities, including cleaning supplies, will be stored in a secure building or shed to prevent unauthorized access by wildlife or humans.
- All chemical leaks will be contained within the secure storage room and any spills will be immediately cleaned up.
- Cultivation site staff will utilize the minimal amount of chemicals as directed which will minimize off site drift. The centralized location of the 1-acre site allows for substantial setbacks from adjoining parcels which will prevent offsite drift.

- Pesticide use around cannabis plants is problematic under California law, any use of pesticides will be completed in a diligent way, in accordance with directions and will be avoided when pollinators are present, thus negating any drift to flowering plants attractive to pollinators.
- The cultivation site written policy will prohibit spraying directly to surface water or allow pesticide product to drift to surface waters. Spraying will only take place when the wind is blowing away from surface water bodies.
- Pesticides use will not be used in such a way as to allow drift to reach surface water or groundwater sources. No pesticides will be used within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

Under state and federal law, a pesticide is any substance intended to control, destroy, repel, or otherwise mitigate a pest. Any organism that causes damage or economic loss, or transmits or produces disease, may be the target pest. Pests can be insects or animals (e.g. mice), unwanted plants (weeds) or organisms that cause plant diseases. “Pesticide” is an umbrella term that includes many kinds of chemicals—natural and synthetic. A pesticide is any substance intended to control, destroy, repel or attract a pest. Any living organism that causes damage, economic loss, and/or transmits or produces disease may be the target pest. Some common pesticides include insecticides, herbicides, rodenticides, molluscicides, fungicides, repellents, disinfectants and sanitizers.

The California Department of Pesticide Regulation produces a fact sheet, available at <http://www.cdpr.ca.gov/>.

At the Jerusalem Grade cultivation operation, pests will be controlled without using any kind of pesticides.

#### ⇒ Pesticide Application and Storage Protocols

All pesticide applications will be carried out by properly licensed cultivation site staff.

Note that the Department of Pesticide Regulation has developed a brief synopsis of appropriate pesticide usage called *Legal Pest Management Practices for Marijuana Growers in California* which can be found as Attachment D in Order R5-2015-0113. Currently, no pesticides are registered for use on Cannabis. Therefore, commercial cultivators are limited to only using pesticides that are exempt from residue-tolerance requirements and are either: (1) registered and labeled for a use that is broad enough to include use on cannabis (e.g., unspecified green plants), or (2) exempt from registration requirements as a minimum-risk pesticide under FIFRA Section 25(b).

The CDFA CalCannabis Program describes pesticide use as follows- Although the California Department of Pesticide Regulation (CDPR) is responsible for managing California’s statewide pesticide regulatory program, the local enforcement of pesticide use regulations is delegated to County Agricultural Commissioners (CACs). With oversight by CDPR, CACs plan and develop county programs and regulate pesticide use to ensure that applicators comply with label

directions and pesticide laws and regulations (CDPR 2011). CACs oversee pesticide use reporting, promote best management practices, and monitor field applications, and they may assist in cleanup of accidental pesticide spills. CACs inspect operations and records of growers, nonagricultural (including industrial and institutional) applicators, pest control dealers, agricultural pest control advisers (PCAs), farm labor contractors, and government agencies for compliance with worker protection standards and other pesticide safety requirements. CACs, assisted by CDPR, investigate incidents in which pesticides harm agricultural workers, people nearby, and the environment, including environmental damage (such as fish or wildlife kills) and water quality contamination. When an enforcement action is needed, CACs have the option to revoke or suspend the right of a company to do business in their county or to issue civil or criminal penalties (CDPR 2011) ....License and certificate types issued by CDPR under the pesticide regulatory program include, but are not limited to, the following (CDPR 2017).....Because there are no restricted-use pesticides registered for use on cannabis, application of pesticides for cannabis cultivation would not require any type of license or certificate. Cultivators, however, may obtain a QAC or QAL, or private applicator certificate, or hire individuals with these credentials, in order to avail themselves of information such as proper mixing, loading, and application techniques and selection and use of personal protective equipment. Cannabis cultivators would not necessarily be required to obtain the services of a PCA but, nonetheless, may choose to do so in order to get professional advice on pest control. (CDFA 2017)

Cultivators must comply with pesticide laws and regulations as enforced by the Department of Pesticide Regulation. All employees applying regulated pesticides shall have a Qualified Applicator License from the Department of Pesticide Regulation. The CDFA CalCannabis Licensing Program has the following pesticide application and storage protocols, which will be implemented:

- Comply with all pesticide label directions;
- Store chemicals in a secure building or shed to prevent access by wildlife;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary to control the target pest;
- Prevent offsite drift;
- Do not apply pesticides when pollinators are present;
- Do not allow drift to flowering plants attractive to pollinators;
- Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
- Do not apply pesticides when they may reach surface water or groundwater; and
- Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

Pesticides will be used according to the instructions on the label or the Safety Data Sheets (SDS). County regulations also apply to listed pesticides. Pesticides will be stored in the detached storage shed or in a locked secure room within the processing building. Chemicals will be properly labeled, and open containers sealed when stored. When handling chemicals, staff will use personal protective equipment such as safety glasses, gloves, dust mask or respirator, boots,

pants and long-sleeved shirt. Pesticides will not be applied on windy days or within 24-hours of a forecasted rain event.

County Code prohibits the use any pesticide that has been banned for use in the state. No such pesticides will be used.

Fertilizers will be stored above ground level in a stormproof, designated material storage shed or in a secure room within the processing building. Fertilizers will be properly labeled, and open containers sealed when stored. Personal protective equipment will be used by staff when handling fertilizers and other chemicals, such as safety glasses, gloves, dust mask or respirator, boots, and pants and long-sleeved shirts. Pesticides and fertilizers will be handled and applied according to their labels and Safety Data Sheets (SDS) as well as recommendations made by a Pest Control Adviser (PCA) and/or Certified Crop Adviser (CCA). See attached Safety Data Sheets for specific information.

All applicators will be trained in accordance with California Department of Pesticide Regulations (CADPR) on how to read labels and safety data sheets prior to any product application and will comply with all label directions.

#### **Cannabis Cultivation Site – Table of Fertilizers and Pesticides**

	<b>Fertilizers</b>	<b>Pesticides</b>	<b>Herbicides</b>	<b>Rodenticides</b>
<b><u>Products to be used at the site.</u></b>	<div>1.chicken manure</div> <div>2.soluable sea weed</div> <div>3.bat guano</div> <div></div>	<div>1.None</div> <div>Only Food-Grade Diatomaceous Earth will be used</div> <div></div> <div></div>	<div>1.None</div>	<div>1.None</div>
<b><u>When are they delivered to the site.</u></b>	<div>Weekly or as needed</div>	<div>Weekly or as needed</div>		
<b><u>How are they to be stored at the site.</u></b>	<div>In their product containers, on shelving within a locked watertight shed.</div>	<div>In their product containers, on shelving within a locked watertight shed.</div>		
<b><u>How are they used.</u></b>	<div>In accordance with product directions.</div> <div>Applied via portable trailer</div>	<div>In accordance with product directions.</div> <div>Applied via portable</div>		



	tank.		applicator.		
<b><u>How are they going to be removed from the site or stored over the winter to prevent discharge or leaks.</u></b>	Stored in shed. Transported away from site in trailer tank.		Stored in shed. Transported away from site in a closed truck bed.		

## 8) Security

**Intent: To minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The Applicant shall provide adequate security on the premises, 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.**

### ⇒ Unauthorized Access and Employee Safety

Access to the Jerusalem Grade cultivation site by the public or unauthorized personnel is prohibited. The protection of and the physical safety of employees is one of the top priorities for site management and staff.

The cultivation operation will be accessed by a private gravel driveway to the cultivation site. The driveway will lead to a parking area outside a 6-foot high, heavy gage chain link security fence and gate with a keypad entry surrounding the cultivation area. The cultivation will be located within the secure fenced enclosure.

The cultivation operations are accessible only to cultivation site personnel. Visitation is only allowed when specific permission is granted. All staff, all suppliers, all product transporters, and all visitors must report to and sign a log in/out record sheet, kept at the house.

Signage will be posted that states that the operational areas have restricted access and are closed to the public. The signage will not advertise the presence of cannabis products.

The Jerusalem Grade cultivation site currently has several pasture fences and cross fencing in place for animal control purposes. Pasture fences and gates will remain in place and provide an additional layer of security.

The establishment of a physical barrier to secure perimeter access to the 42,000 square foot cultivation area is required by the County and will be provided. A 6' tall chain link fence will be constructed around the perimeter of the cultivation area a commercial-grade key pad access lock will be provided at the front entry gate. These measures constitute the primary access restriction.

Additional secondary fencing or other barriers around the parcel, the pasture, the driveway, and entrances including windows, roofs, or ventilation systems, may be installed as necessary.

A security alarm and camera system to notify and record incident(s) where physical barriers have been breached will be installed, used and maintained.

The premises will be outfitted with security cameras and security lighting and maintained in such a way that visibility and security monitoring of the premises is practical and effective.

All suspicious activities will be documented and depending on the nature of the activity referred to the Lake County Sherriff Department:

<b>Lake County Sheriff Phone Numbers</b>	
<b>Administration &amp; Patrol: (707) 262-4200</b>	<b>Emergency: 911</b>
<b>Central Dispatch – (Non-Emergency): (707) 263-2690</b>	<b>Toll Free – (Non-Emergency): (800) 693-9991</b>

⇒ Theft Prevention and Loss Control

Lake County and the State of California requires an inventory system to track cannabis material and personnel handling the material. This requirement will be fulfilled by following the criteria of the CalCannabis Licensing Program, which creates a Track-and Trace System.

- Sections 8401 through 8405 of the Licensing law requires that the CalCannabis Department shall establish a track-and-trace system for unique identifiers of cannabis and nonmanufactured cannabis products, which all licensees shall use.
- Each licensee shall report in the track-and-trace system the disposition of immature and mature plants, as required by Section 8402 of this Chapter, and nonmanufactured cannabis products on the licensed premises and any transfers associated with commercial cannabis activity between licensees.
- The licensee is responsible for the accuracy and completeness of all data and information entered into the track-and- trace system.
- Data entered into the track-and-trace system is assumed to be accurate and can be used to take enforcement action against the licensee if not corrected.
- Attempts to falsify or misrepresent data or information entered into the track-and-trace system is a violation and subject to enforcement.

- Establishment of an account in the track-and-trace system prior to engaging in any commercial cannabis activities associated with their license and maintain an active account while licensed.
- The cultivation site Track-And-Trace System Administrators are:
  - Bridget King
- Jerusalem Grade Cultivation site personnel will be granted access within the cultivation site to only those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties.
- There will be supervision of tasks or processes with a high potential for diversion (including the loading and unloading of cannabis transportation vehicles. Supervision will include video surveillance and/or the requirement that the Security Officer or their designee to be present.
- Diversion or theft of cannabis will not be tolerated at the cultivation site and will be reported to the Lake County Sheriff.
- Cultivation site personnel will be subject to task or processes monitoring and supervision particularly in those area with a high potential for diversion (including within the cultivation site, the drying building, and in areas where the loading and unloading of cannabis transportation vehicles occurs).
- Cultivation site management will designate an area within lockers in the processing building and within the fenced in area at the front of the parcel where personnel may store and access personal items.

⇒ Emergency Contacts

The following cultivation site Emergency contact(s) are available 24 hours/seven (7) days a week including holidays:

Name	Email	Phone	Mailing Address
Bridget King <i>*Security Officer</i>	<u><a href="mailto:bridgetmarie00@gmail.com">bridgetmarie00@gmail.com</a></u>	(515) 988-3477	Post Office Box 1018, Lower Lake, CA 95457

The cultivation site encourages neighborhood residents, if any, to call the following persons to resolve operating problems, if any, before any calls or complaints are made to the County.

Name	Email	Phone	Mailing Address
Bridget King	<u><a href="mailto:bridgetmarie00@gmail.com">bridgetmarie00@gmail.com</a></u>	(515) 988-3477	Post Office Box 1018, Lower Lake, CA 95457

The cultivation site will maintain a Log Book of and procedures for 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.

### **CULTIVATION SITE OPERATIONS LOG BOOK**

<b>NATURE OF COMPLAINT</b>	<b>DATE AND TIME RECEIVED</b>	<b>RESPONSE TO COMPLAINT AND REFERRAL OF COMPLAINT</b>	<b>RESOLUTION</b>

#### ⇒ Video Surveillance

The Jerusalem Grade cultivation site premises will be provided with a complete digital video surveillance system with a minimum camera resolution of 1280 x 1080p.

The video surveillance system will be capable of recording all predetermined surveillance areas in any lighting conditions and will be supported by remote access by the cultivation site Owner/Project Managers. All video surveillance cameras will be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

Areas that will be recorded on the digital video surveillance system include, but are not limited to, the following:

- The perimeter of the cannabis cultivation site.
- Areas where cannabis vegetative matter is destroyed.
- Areas containing surveillance-system computer and monitoring devices, in which case, at least one camera will record the access points to such an area.
- The interior and exterior of all entrances and exits to the cannabis cultivation sites.

The digital surveillance system will also include the following features:

- Operate continuously 24 hours per day and at a minimum of 30 frames per second.
- All exterior cameras will be waterproof, I-66 minimum.
- All interior cameras will be moisture proof.
- Cameras will be color capable.
- Video management software will be capable of integrating cameras with door alarms.

- Video recordings will be digital.
- Thermal/infrared technology will be used for perimeter fencing and areas with inadequate lighting.
- All cameras will include motion sensors that activates the camera when motion is detected.
- All recording data will be stored 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.
- All surveillance recordings will be kept on the applicant's recording device or other approved location for a minimum of 30 days.
- All video surveillance recordings are subject to inspection by the County and will be copied and sent, or otherwise provided, upon request.
- The video recordings will 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 will not significantly obstruct the view of recorded images.
- To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.
- The video management software will be capable of integrating cameras with door alarms.
- All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.
- Data transfer will be by coax cable or by Wi-Fi router.
- Power supplies shall be self-contained, solar arrays and batteries.

⇒ Required Fencing

The 42,000 square foot cultivation site will be provided with fencing as required by the County. The proposed fencing will include, at a minimum, the following:

- The entire cultivation site will be enclosed with a sturdy chain link fence.

- Fence panels will consist of metal mesh “cyclone” fabric or welded wire mesh.
- Steel tubing, timber, or concrete posts driven into the ground or set in concrete.
- End, corner or gate posts, commonly referred to as “terminal posts,” set in a concrete footing or otherwise anchored to prevent leaning under the tension of a stretched fence.
- Posts set between the terminal posts will be set at intervals not to exceed 10 feet.
- A top horizontal rail between all posts.
- Fence fabric attached to the posts and top horizontal rail.
- No barbed wire, razor wire or similar design will be used.
- The cultivation site area will be screened from public view by topographic barriers, vegetation, or chain link slats.
- No outdoor cannabis cultivation will exist on the parcel outside the fenced perimeter. The fenced cultivation compound will have two vehicle gate and one pedestrian gate. The gates will consist of metal tube frame and the paneling will be the same as described above. The vehicle gates will be 12 feet wide allowing service vehicles to ingress/egress. The gates will be secured with commercial-grade key pads.
- Lock combinations will be controlled by the Security Officer.

#### ⇒ Security Measures

General security measures at the cultivation site will include the following:

- Preparation and maintenance of a comprehensive site and facility security plan updated as needed;
- Employee screening protocol and hiring criteria;
- Implementation of personnel rules and responsibilities (to be incorporated into an employee handbook in the future);
- Staff training;
- Construction of physical barriers, including signage, road gates, security fencing with locked gates, and commercial-grade locks on all interior doors, card lock system;
- Installation and maintenance of an alarm system that can notify security personnel and record incidents where physical barriers have been breached;

- Implementation of a theft and loss control program;
- Operation and maintenance of a video surveillance system.

The Security Officer(s) for the cultivation site are:

Name	Email	Phone	Mailing Address
Bridget King <i>*Security Officer</i>	<u><a href="mailto:bridgetmarie00@gmail.com">bridgetmarie00@gmail.com</a></u>	(515) 988-3477	Post Office Box 1018, Lower Lake, CA 95457

The cultivation site Security protocol will require that Security Officers maintain a record of all incidents and problems, and details concerning the resolution of complaints, and provide a monthly report thereof. A summary of the complaints, incidents, or problems will be included in the annual Performance Review Report.

The cultivation site will operate with the following basic personnel rules and responsibilities:

- Obey the rules of the Security Plan;
- Sign in when entering the facility and sign out when exiting the facility;
- Do not carry any weapons;
- Do not engage in lengthy conversation with the public or respond directly to complaints: direct all such concerns to the Security Officer;
- Only authorized vehicles are allowed in operational areas;
- Do not bring backpacks or other unnecessary storage devices that might complicate the theft control program;
- Lockers will be provided for personal items; and
- Do not enter restricted areas unless authorized to do so.

## 9) Storm Water Management

<p><b>Intent: 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.</b></p>
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The Jerusalem Grade Cultivation Site Plan provides detail regarding the proposed plans for the 42,000 square foot fenced grow site and adjacent area and includes a graphic representation of how storm water runoff will be managed to protect downstream receiving water bodies from water quality degradation.

It is not anticipated that there will be a significant issue with storm water pollution, however, there could be some materials and construction or cultivation activities that could impact pollute storm water that have the potential to contribute sediment to storm water discharges including:

- Tilling, grading and excavation operations;
- Soil import/export operations;
- Structure installation process;
- Driveway and parking area construction;
- Use of vehicle lubricants and fuels, including oil, grease, diesel and gasoline, and coolants;
- High pH gardening materials and wastes;
- Pesticides, nutrient pollution (nitrates, phosphates, biological oxygen demand, etc.) ;
- Treated lumber (materials and waste)

Several pre-construction erosion control measures exist within the project site including a rocked and vegetated drainage channel, long buffer distances between the intended cultivation area and the drainage channel, a paved house driveway, and the presence of existing vegetation.

The Jerusalem Grade cultivation site will comply with all orders, regulations, and procedures of the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board, as appropriate.

Storm water runoff from the 42,000 square foot cultivation site will be managed in essentially three key ways. First, storm water runoff from the drying building roof will be directed to a standard gutter system at the eaves, and then plumbed to a rainwater catchment system and water storage tanks located just outside the main gate. This rainwater will be used for both a fire protection sprinkler system and as a possible secondary irrigation source if needed. Second, the surface of the 42,000 square foot fenced cultivation area will be a semi-pervious material that will allow some absorption of rainwater. Third, any surplus storm water that runs off the site will be directed to a vegetated surface water run off - drainage area using the natural ground contours to an area to the northwest of the cultivation fenced area. The site will not generate any



illicit discharges of irrigation or storm water from the premises, as defined in Title 40 of the Code of Federal Regulations, Section 122.26, which could result in degradation of water quality of any water body.

**Setbacks and Buffers:** County regulations require all cultivation operations be located at least 100 feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool).

The cultivation operation is enrolled as a Tier 1/Low Risk cultivation operation in the State Water Resources Control Board's Order WQ 2017-0023-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. A sediment and erosion control plan will be implemented as part of the site's larger Site Management Plan, which includes active management by the Project Manager (stormwater manager).

Duties of the designated stormwater manager include but are not limited to ensuring full compliance with the site Storm Water Plan; Chapter 29 -Storm Water Management Ordinance of the Lake County Ordinance Code; and all applicable regulations imposed by the California State Water Board and its related agencies.

The storm water manager will organize orientation sessions with all installation, inspection, and maintenance personnel upon initiation of a specific project activity or change in key personnel. These sessions will be setup to ensure that all operations are implemented in accordance with this Plan. Training sessions will be included as part of regular personnel safety meetings to familiarize workers with the requirements of the Plan, including all BMP protocols.

The surface water from the 42,000 square foot fenced cultivation area will not discharge into a Lake County maintained drainage or conveyance system. There are no public roads and bridges downstream of the onsite discharge area.

Given that some rainwater will be collected and stored in tanks and that there will be pervious surface materials used that will allow for storm water absorption, and that any other runoff will be directed to the runoff surface dispersal area, the discharge of stormwater from the cultivation site will not increase the volume of water that historically has flowed onto adjacent properties. Flood elevations downstream of the project site will not be affected by the cultivation project.

In accordance with Section 24.1 of Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance Code, Jerusalem Gold will implement Best Management Practices to control the discharge of pollutants to the maximum extent practicable, and to eliminate non-storm water discharges that are not authorized or that are not in compliance with an NPDES permit or any other applicable regulations. This Property Management Plan incorporates a significant number of CASQA Best Management Practices and are attached.

The proposed grading of the property will be minimal. As indicated on the site topographic map, the 42,000 square foot cultivation site is in an area that is essentially flat with a slight tilt. The proposed cultivation area is located on open lands.

The large vegetated buffers surrounding this facility, coupled with the existing drainage ditch, serves to moderate stormflows and regulate runoff volumes such that flooding can be completely avoided. These large vegetated buffers allow stormwater that is discharged from operation areas to be slowed, filtered, and percolate into soils. In general, stormwater on the parcel infiltrates the soil.

The site will monitor winter storm water and runoff patterns for any turbidity. The methodology of the monitoring program will involve weekly or if necessary, daily site and perimeter inspections for signs of erosion including rivulets, gullies, and pooling of concentrated sediments after significant rainfall events. Site inspections will also identify any spills, leaks, or uncontrolled pollutant sources; evaluate BMPs to identify whether they have been properly implemented; inspection of storm water storage and containment areas to detect leaks.

Sufficient quantities of temporary sediment control materials will be maintained on-site throughout the rainy season to allow implementation of temporary erosion and sediment controls in the event of predicted rain, and for rapid response to failures or emergencies.

A copy of this Property Management Plan will be made available to the Project Managers, Owner, site personnel or contractors engaged in the maintenance or installation of storm water BMPs.

It is understood that expansion / modification of cultivation operational area will require a modification of this plan and approval by the County of Lake as established in the Cultivation regulations.

## **10) Waste Management**

**Intent: 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.**

The Jerusalem Grade cultivation site will generate a small amount of waste on an annual basis. The estimated peak waste generation in pounds per day:

- Paper: 1.5 lbs.
- Glass: 5 lbs.
- Metal: 5 lbs.
- Electronics: 6 oz.s
- Plastic: 5 lbs.
- Organics: 150 lbs.
- Household hazardous waste: none.

The CDFA CalCannabis Program states, “Cultivators must comply with the California Integrated Waste Management Act of 1989, which requires that all California cities and counties reduce, recycle, and compost at least 50 percent of wastes by 2000.”

Solid waste generated by the proposed operations will be reduced using some combination of the following strategies and activities:

- Provide filtered water and dedicated cups instead of bottled water for staff.
- Use biodegradable containers;
- Use durable materials to reduce the use of disposable materials;
- Try to use vendors that use reusable packaging and shipping containers; encourage vendors to do so;
- Minimize the volume of packaging material required by selecting products packaged efficiently or by buying in bulk;
- Employ soil fertility practices, such as nitrogen fixation, to reduce the importation of fertilizers and soil amendments; and
- Use electricity-powered vehicles and equipment and install a solar array and battery storage.

⇒ Waste Collection, Storage, and Disposal

A waste bin enclosure will be located just outside of the fenced area of the cultivation site adjacent to the parking area. Waste bins will consist of trash cans (20 or 35 gallon) with lids or roll-off totes with lids. Recyclables will be segregated from solid waste and stored in tote(s) in the enclosure. The location of the waste enclosure is shown on the site plan. The area will be large enough to accommodate the solid waste generated by the proposed operation.

At weekly intervals, cultivation staff will transfer the waste containers by truck to the property to an appropriate location for pick up by South Lake County Refuge or haul them to an appropriate off-site recycling facility. Recyclables such as scrap metal, glass, metal and plastic containers, can be picked up at the “curbside” location or conveniently unloaded at a recycling drop-off center (a Lake County Integrated Waste Management facility or private facility). Cardboard and newspaper will be recycled or may be used for mixing in with other composting materials.

Yard waste, green waste, and other compostable materials will be segregated and stored away from the solid waste. Compost and recyclable wood will be handled in accordance with CalCannabis regulations. Household and non-cannabis green waste may be dropped off at any compost facility where it is processed as new compost.

Household toxic materials will be segregated from the solid waste and disposed of at a Lake County Integrated Waste Management facility. See Section 12 of this Plan for information about the site’s cannabis vegetation management program.

Waste will be hauled to an appropriate licensed facility by the private waste-hauler or by cultivation operation staff. The Lake County Integrated Waste Management facilities are: • Eastlake Landfill, 16015 Davis Ave, Clearlake • Lake County Waste Solutions Transfer Station and Recycling Center, 230 Soda Bay Road, Lakeport • South Lake Refuse and Recycling Center, 16015 Davis Street, Clearlake • Quackenbush Mountain Resource Recovery and Compost Facility, 16520 Davis Street, Clearlake.

The following material handling and waste management measures will be implemented:

- Prevent or minimize handling of wastes that can be negatively impacted by contact with stormwater during a storm event;
- Contain all stored wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or can come into contact with stormwater during handling;
- Cover waste disposal containers and material storage containers when not in use;
- Divert run-on and stormwater generated from within the facility away from all stockpiled materials;
- Clean all spills of wastes that occur during handling in accordance with the spill response procedures; and
- Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with chemical/industrial materials or wastes.

The cultivation site will employ a variety of BMPs associated with solid waste management. All cannabis cultivation operation BMPs are attached with this Property Management Plan

⇒ Hazardous Waste Management

The Jerusalem Grade cultivation site Hazard Analysis is for the cultivation, harvest, and curing of cannabis. Cannabis will not be manufactured at this cultivation. If Cannabis is ever manufactured at this facility, the hazard analysis will be expanded and revised. No hazardous materials will be used on the site, so no hazardous wastes are anticipated.

Just in case, Jerusalem Grade notes the following: the CDFA CalCannabis Program indicates that “with adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low. In general, cannabis cultivation would not make intensive use of hazardous materials.”

The cultivation site environmental protection measures will help minimize potential accidental releases of hazardous materials by storing chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. The risk of accidental releases of

hazardous materials from lawful cannabis cultivation operations would be lower than many other ongoing activities in the state, including existing unpermitted cannabis cultivation activities.

The CDFA 2017 indicates that Cannabis cultivation sites may be located in areas of high risk for wildfire.

Potential biological hazards for unprocessed cannabis at the cultivation facility are microbiological, and specifically, fungal growth. In rare instances, some Cannabis crops can be contaminated with coliforms that derive from soils or improper staff hygiene. Insects and arachnids, such as mites, could also be present on Cannabis product. Outdoor biological hazards include snake bites, insect stings, and weather exposure.

Potential chemical hazards for unprocessed cannabis are associated with residues from fertilizers; insecticides; and fungicides. Petroleum product usage could also lead to contamination of cannabis product or soil. For cultivation staff, the chemical hazards are related to exposure to hazardous chemicals.

Potential physical hazards associated with unprocessed cannabis product include the introduction of material fragments such as stone, glass, metal fragments, or hair. Such contamination could occur from a variety of sources, such as fugitive dust, dirty containers during transport, etc. For cultivation staff, the physical hazards are cuts by sharp objects, falling objects, and weather exposure.

Insect infestations and fungal growths are common hazards. Insect infestations, fungal vectors, and fungal growth will be controlled in various ways. Regular testing for fungal spores on raw product will be conducted. If a biological contaminant is found, the incident will be investigated to determine the source.

⇒ Basic HazMat safety protocols will include:

- Areas inside the cultivation compound will be graveled to suppress dust and mud. Live traps may be deployed to remove rodents from operational areas;
- Disposable coveralls and other personal protective equipment will be used to increase sanitation levels and reduce vectoring of mites and other pests;
- A clothing changing station area will be provided for employees so that street clothing can be separated from cultivation clothing when necessary;
- The number of workers and visitors inside the cultivation area will be minimized, as mites can travel on clothes. Maximum open sun use can lower humidity levels and discourage fungal growth;
- Chemical contamination of raw product is possible, but unlikely. Regular testing for chemical residues on raw product will be performed. Chemical contamination will be reduced by implementation of Best Management Practices which are set forth in other

subsections of this Plan. The use of organic-certified chemicals will also reduce this hazard significantly;

- For cultivation staff, the risk of chemical exposure will be reduced by the use of personal protective equipment and the implementation of Best Management Practices, as identified in other subsections of this Plan, and adherence to all product usage guidelines and recommendations;
- The contamination of raw cannabis product by physical residues is relatively common, but easy to avoid. Facilities will be kept as clean as possible. Disposable coveralls (e.g. Tyvek) may be used to increase sanitation levels. Plastic sheeting will be used when raw product must be handled or stored. Equipment, such as scissors and saws, will be sanitized with ethanol; and
- For cultivation staff, the risk of physical hazards will be reduced using personal protective equipment.

⇒ Hazardous Waste Management Plan

The Lake County Environmental Health Department is the Certified Unified Program Agency (CUPA) for all of Lake County, regulating hazardous waste and hazardous materials. The CUPA typically requires a Hazardous Materials Business Plan for the following volumes of hazardous materials: greater than 55 gallons of liquid; 200 standard cubic feet of compressed gas; or 500 pounds of a solid. All permittees shall manage all waste that is hazardous waste, as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations.

Any chemicals used at the cultivation site will be stored in a secure room within the processing building or in the secure storage shed, in order to minimize the risk of stormwater impacts. Chemicals will be properly labeled, properly segregated, and open containers sealed when not in use. All chemicals will be stored above ground level as required.

Jerusalem Grade Cultivation site staff will use personal protective equipment such as safety glasses, gloves, dust mask, boots, and pants and long-sleeved shirt when handling chemicals.

Gasoline in 1 or 5-gallon containers may be used to fuel small engines such as an electrical generator, quad ATV, the tiller, and line trimmers. No significant quantities of petroleum products will be used. All large equipment maintenance operations will typically occur off-site at service stations.

Safety Data Sheets (SDS) will be kept on file for each chemical used at this facility and will be made available to all staff for viewing. When a new chemical is brought on to the facility, there will be a brief staff meeting to discuss proper storage, handling, and disposal of the chemical.

A variety of BMPs related to Hazardous Waste will be employed as part of the proposed cannabis cultivation activities. See attached BMB's for more details including protocols related to vehicle fueling and cleaning; storage of HazMat materials; waste handling and disposal; etc.

### ⇒ Cannabis Vegetative Material Waste Management

The CDFA CalCannabis Program describes green waste as follows: “Green waste is generated throughout the cannabis cultivation process. Some plants fail to reach maturity, pruning generates waste, nuisance weeds must be removed, and other plant material remains unused following harvesting, processing, and preparation for a new crop to be planted.”

Green waste will not be piled and stored near active cannabis crops to avoid fungal pest issues that may occur on the waste and spread to the living cannabis plants.

Disposal of cannabis green waste will follow procedures established by the State. All cannabis waste will be composted on-site.

Under Section 8305, Cannabis Waste Management, of the State regulations, acceptable types of non-cannabis waste are any nonhazardous compostable materials, as defined in Title 14 of the California Code of Regulations at Section 17852(a)(11). After the waste is ground and mixed, licensees may dispose of it at a manned and permitted solid waste landfill, compostable materials handling facility, or in-vessel digestion facility as described in the regulations.” (CDFA 2017)

Sources of green waste from the cultivation operation consist of the following:

- mulch, humus, etc.
- landscape maintenance: lawn and weed trimmings, old lumber, wood fencing, etc.
- Cannabis processing waste: leaves, stems, and root balls that remain after flower harvest, trimming, and grooming; etc.

Volume of green waste generated by this cultivation operation is estimated at:

- 3 cubic yards per month, or 36 cubic yards per year.

Cannabis green waste will be weighed daily, weekly, or as needed, and data shall be recorded for reporting requirements.

### ⇒ Handling and Disposal of Cannabis Vegetative Waste

There will be a dedicated area both inside and just outside of the 1-acre cultivation compound where cannabis waste is to be handled. These areas will be surveilled by video camera, and cannabis waste will be weighed at regular intervals as part of the Track and Trace Program. Cannabis waste will be handled by staff using personal protective equipment (PPE), including long-sleeved shirts, pants, boots, dust mask, eye protection, and gloves.

Cannabis waste will be composted onsite. Non-cannabis green waste will also be composted.

California Department of Food and Agriculture’s CalCannabis Cultivation Licensing Program dictates specific Cannabis waste management practices, that will be used, as applicable, in the Jerusalem Gold cultivation operation.

Volume of green waste generated by this cultivation operation is estimated at:

- 3 cubic yards per month, or 36 cubic yards per year.

Cannabis green waste will be weighed daily, weekly, or as needed, and data shall be recorded for reporting requirements.

For the purposes of this Plan, growing medium consists of soil and non-organic amendments (vermiculite, perlite, silica gel, etc.). It does not include fertilizers or organic amendments such as mulch, humus, worm castings, etc. See the Fertilizer subsection of this Plan for a discussion on organic amendments.

⇒ Growing Medium and Disposal

The growing medium for this cultivation operation will be imported and consists of approximately 970 yards of amended topsoil. Each planting station will consist of raised planting beds with the amended topsoil.

Growing medium waste will be reduced or eliminated by composting and blending old soils with new soils and amendments. No significant amounts of growing media are expected to be disposed. Instead, waste medium is reduced in volume yearly because it is absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Soil staging areas and compost piles will be located inside the fenced compounds or an area opposite the processing building. BMPs will be employed to ensure that these piles do not contaminate stormwater or cause nuisance dust or odor issues.

The cultivation site is investigating the feasibility of, and may implement a soil recycling program, involving the loading and hauling of used soil to local licensed composting facility for resale and reuse.

The following regulations from the CalCannabis Cultivation Licensing Program are quoted as follows, and incorporated by reference:

*§ 8305. Cannabis Waste Management (a) For the purposes of this Chapter, “cannabis waste” is waste that is not hazardous waste as defined in Section 40141 of Public Resources Code, and is solid waste, as defined in Section 40191 of Public Resources Code, that contains cannabis and that has been made unusable and unrecognizable in the manner prescribed in subsection (e). A licensee may not sell cannabis waste. (b) A licensee shall manage all waste that is hazardous waste, as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations. (c) A licensee shall dispose of cannabis waste as identified in the licensee’s Cultivation Plan approved by the Department. A licensee shall not dispose of cannabis waste in an unsecured waste receptacle, whether in the control of the licensee or not. (d) Cannabis that a licensee intends to render into cannabis waste shall be held in the designated holding area for a minimum of 72 hours. A licensee shall affix to each batch one or more documents with batch information and weight. At no time during the 72-hour hold period may the cannabis be handled, moved, or rendered into cannabis waste. The cannabis the licensee intends to render into cannabis waste is subject to inspection by the Department. (e) A licensee shall make cannabis into cannabis waste by rendering the cannabis unusable and*



unrecognizable. The licensee shall render the cannabis into cannabis waste before removing the cannabis waste from the licensed premises. A licensee shall render the cannabis into cannabis waste by grinding and incorporating the cannabis with other ground material so that the resulting mixture is at least 50 percent noncannabis material by volume. A licensee shall render cannabis into cannabis waste and track that waste by batch. (f) Cannabis that a licensee wishes to deposit at a compostable materials handling facility or at an in-vessel digestion facility may be rendered cannabis waste by incorporating any nonhazardous compostable material, as defined in Title 14 of the California Code of Regulations at Section 17852 (a)(11), that a compostable materials handling facility or in-vessel digestion facility may lawfully accept. (g) Unless a licensee will compost onsite, after a licensee renders the cannabis into cannabis waste, a licensee shall do one of the following with the cannabis waste: (1) Dispose of the cannabis waste at a manned and fully permitted solid waste landfill; (2) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted compostable materials handling facility; or (3) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted in-vessel digestion facility. (h) In addition to all other tracking requirements set forth in Sections 8404 and 8405 of this Chapter, a licensee shall use the track-and-trace system and onsite documents to ensure the cannabis waste materials are identified, weighed, and tracked while on the licensed premises and when disposed of or deposited in accordance with subsection (g). (i) A licensee shall enter the date and time that the cannabis was rendered cannabis waste and the weight of the resulting cannabis waste into the track-and-trace database.

(j) A licensee shall maintain accurate and comprehensive records regarding cannabis waste material that account for, reconcile, and evidence all activity related to the generation and disposal or disposition of cannabis waste. A licensee shall obtain a record from the solid waste facility evidencing the acceptance of the cannabis waste material at the facility. The record shall contain the name and address of the facility, the date, and the volume or weight of the cannabis waste accepted. These documents are records subject to inspection by the Department and shall be kept in compliance with Section 8400 of this Chapter. (k) A licensee shall enter the date and time of the disposal or deposit of the cannabis waste at a solid waste facility, compostable materials handling facility, or an in-vessel digestion facility into the track and-trace system.

14.7. Growing Medium Management The CDFA CalCannabis Program describes soils handling as follows: "Soils used in cannabis cultivation may be treated, reused, stockpiled, and/or discarded. For reuse, soils are piled and covered with tarps for an extended period (months to a year) to allow heat from sunlight to destroy any potential soil pathogens or pests. Another practice for soil reuse is to run a compost tea through the soils between harvests to restore soil nutrients. Although it is not a direct component of the Proposed Program, another aspect of soil reuse can include laboratory testing of soil samples to identify nutrient deficiencies or other issues. Identifying such deficiencies allows the soil to be properly treated or amended with fertilizers or other soil amendments, thereby correcting these deficiencies, prior to being reused with a new cannabis crop." (CDFA 2017)

"Outdoor cultivation typically involves planting rooted cannabis cuttings or seeds in the early spring and harvesting the plants in the fall (mid-September through November), after the plants flower. Soils used in the pots or grow bags are typically amended to ensure that nutrients are available to the plants throughout the growing season. Compost teas, which are created by

*steeping compost material in water, may also be used to fulfill nutrient needs (Ingham 2014). Water and nutrient supplement needs for outdoor cultivation may vary depending on the type of growing container selected. For example, raised beds typically require more watering and additional liquid nutrient application compared to other growing container options.” (CDFA 2017) For the purposes of this Plan, growing medium consists of soil and non-organic amendments (vermiculite, perlite, silica gel, etc.). It does not include fertilizers or organic amendments such as mulch, humus, worm castings, etc. See the Fertilizer subsection of this Plan for a discussion on organic amendments. 14.7.1. Types and Volumes of Growing Medium The growing medium for this cultivation operation will be imported and consists of approximately 967 yards of amended topsoil. Each planting station will consist of raised rolling benches with the amended topsoil. 14.7.2. Growing Medium Handling, Disposal, and Waste Reduction Growing medium waste will be reduced or eliminated by composting and blending old soils with new soils and amendments. No significant amounts of growing media are expected to be disposed. Instead, media is reduced in volume yearly because it is absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Soil staging areas and compost piles will be located inside the fenced compounds or an area near the Barn. BMPs will be employed to ensure that these piles do not contaminate stormwater or cause nuisance dust or odor issues. Konocti Diversified Agriculture is investigating the feasibility of, and may implement a soil recycling program, involving the loading and hauling of used soil to local licensed composting facility for resale and reuse.*

## **11) Water Resources- Adverse Impacts**

<b>Intent: To minimize adverse impacts on surface and groundwater sources.</b>
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According to maps in the Lake County Groundwater Management Plan, the Project Area appears in no designated water basin identified by geological analysis.

The Cannabis cultivation operations will use water from an onsite agricultural well with a County permit. The cultivation site shall not divert surface water. State permits are needed to use surface water. The Ordinance has the following requirements for use of a well: Where a well is used, the well must be located on the premises. The production well shall have a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The monitoring wells shall be constructed, and monitoring began at least three months prior to the use of the supply well. An applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually.

### **⇒ Water Resource Protection**

The Jerusalem Grade cultivation operation is enrolled as a Tier 1/Low Risk cultivation operation in the State Water Resources Control Board’s *Order WQ 2017-0023-DWQ General Waste*

*Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order).*

Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight.

⇒ Avoidance and Minimization Measures

The cultivation operation is located as far away as possible from waterbodies and in a relatively flat area of the parcel to reduce the potential for storm water pollution. All cultivation operations be located at least 100 feet away from all waterbodies as required by the Lake County Cannabis Ordinance.

Generous vegetative buffers exist in between this cultivation operation and the nearest waterbody. Areas that are covered in grasses will be regularly mowed or trimmed. Areas that are covered in natural habitats or landscaping should not be mowed.

⇒ Best Management Practices

Water resource protection BMPs were identified and discussed in the Stormwater Management subsection and the CASQA BMP sheets are attached.

⇒ Water Quality Monitoring Program

The Project Site Monitoring Program will be developed and implemented to address the following objectives:

- To demonstrate that the site is in compliance with all permits and ordinances;
- To determine whether non-visible pollutants are present at the project site and are causing or contributing to exceedances of water quality objectives;
- To determine whether immediate corrective actions, additional BMP implementation, or Plan revisions are necessary to reduce pollutants in storm water discharges and authorized non-storm water discharges; and
- To determine whether BMPs indicated in the Plan are effective in preventing or reducing pollutants in storm water discharges and authorized non-storm water discharges.

Based on the project's location, construction periods and rainfall erosivity factor, the project manager should perform site inspections at the following times:

- Beginning of the rain season;
- Before and after any storm that produces over 1 inch of rain; and
- During any storm that produces a significant stormwater discharge.

Each inspection event will be logged in the Inspection Log in this Plan or in a separate binder.

The inspectors shall be prepared to collect samples and conduct visual inspections. Inspectors are not required to physically collect samples or conduct visual inspections under the following conditions:

- During dangerous weather conditions such as flooding and electrical storms; and
- Outside of scheduled site business hours.

All inspection and sampling activities should be performed by the stormwater manager until site personnel are properly trained to take over these tasks. The name(s) and contact number(s) of the assigned inspection and sampling personnel are:

Bridget King

⇒ Record Keeping and Reports

The site manager or storm water manager should retain records of all storm water monitoring information and copies of all reports for a period of at least three years. Each inspection event can be logged in the Inspection Log in a binder. These records include:

<b>The date, place, time of facility inspections, sampling, visual inspections and/or measurements, including precipitation.</b>	<b>The individual who performed the facility inspections, sampling, visual inspections.</b>	<b>The date and approximate time of analyses</b>	<b>Rain gauge readings from site inspections;</b>	<b>Non-storm water discharge inspections and visual inspections and storm water discharge visual observation records;</b>	<b>Visual observation and sample collection exception records</b>	<b>The records of any corrective actions and follow-up activities that resulted from analytical results, visual inspections, or inspections</b>	<b>The individual(s) who performed the analyses</b>

⇒ Visual Inspection Plan

The inspector is only required to conduct visual observations (inspections) during business hours only. The inspector should record the time, date and rain gauge reading of all qualifying rain events. Within 2 business days (48 hours) prior to major rain events, the inspector should visually observe (inspect):

- All storm water drainage areas to identify any spills, leaks, or uncontrolled pollutant sources (if needed, the site manager should implement appropriate corrective actions);
- All BMPs to identify whether they have been properly implemented in accordance with the Plan (if needed, the site manager shall implement appropriate corrective actions); and
- Any storm water storage and containment areas to detect leaks and ensure maintenance of adequate freeboard.

The inspector should conduct during-rain event visual observations (inspections) at regular intervals during extended storm events. The inspector will visually inspect storm water discharges at all discharge locations.

Within two business days (48 hours) after major rain events, the inspector should conduct post rain event visual observations (inspections) to (1) identify whether BMPs were adequately designed, implemented, and effective, and (2) identify additional BMPs and revise the Plan accordingly.

For the visual inspections described above, the inspector shall observe the presence or absence of floating and suspended materials, a sheen on the surface, discolorations, turbidity, odors, and source(s) of any observed pollutants. The inspector should maintain on-site records of all visual observations (inspections), personnel performing the observations, observation dates, weather conditions, locations observed, and corrective actions taken in response to the observations.

## 12) Water Resources- Conservation

**Intent: To conserve the County's water resources by minimizing the use of water.**

The Cannabis cultivation operations will use water from an existing groundwater well. This well is permitted with the County and uses an electric pump.

The cultivation site will not take water directly from any surface waterbodies.

State permits are needed to divert surface water. Water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. Jerusalem Gold will notify the Department within 7 days of the emergency and provide the following information: a description of the emergency; identification of the retail water supplier including license number; the volume of water supplied; and actions taken to prevent the emergency in the future.

A water meter and water level monitor will be installed for the cultivation site; water consumption will be logged daily. A water budget will be created every year and water use efficiency will be analyzed for the previous year. Annual consumption records will be provided to the County as required.

Water use requirements for outdoor and mixed-light cannabis production are similar to water use requirements for other agricultural crops such as corn (CDFA 2017).

CDFA (2017) reports the following regarding the water use for cannabis:

*“According to Hammon et al. (2015), water use requirements for outdoor cannabis production (25-35 inches per year) are generally in line with water use for other agricultural crops, such as*

*corn (20-25 inches per year), alfalfa (30-40 inches per year), tomatoes (15-25 inches per year), peaches (30-40 inches per year), and hops (20-30 inches per year). Lindsey (2012) similarly cites a University of California researcher who suggested that cannabis does well under irrigation management and, as a small-acreage crop, will use far less water than crops such as cotton. Estimates of daily water usage per cannabis plant range from 5 gallons (Live Science 2014) to 6-8 gallons (CDFW 2016)."*

CDFA (2017) concludes the following regarding groundwater impacts from small cultivation operations:

*"Based on the relatively low quantities of water use (from 0.002 to 1.8 acre-feet per year), the likelihood that an individual cultivator or group of cultivators using groundwater from a defined alluvial aquifer would, by themselves, cause substantial groundwater overdraft is considered unlikely, for several reasons. First, groundwater overdraft is typically caused by the combination of various uses in a basin and is not typically attributable to a particular user or set of users; in other words, it is typically a cumulative issue (which is discussed in more detail in Chapter 6, Cumulative Considerations). In addition, the size limitations for cultivation sites under the Proposed Program would limit the maximum extent of water use. For instance, the highest estimate, provided by Hammon et al. (2015), would result in less than 3 acre-feet of annual usage at the largest allowable cultivation site of 1 acre. Finally, no information is available to suggest that there would be high concentrations of cultivators using groundwater from an alluvial basin in a particular location in a manner that could substantially affect neighboring wells." (pages 4.8-34 to 4.8-35)*

The cultivation staff estimates that the cultivation project water demand/usage will average 3000 gallons per day and that peak demand could reach 5000 gallons per day (during the regular outdoor growing season from May to October, *only*). There is sufficient water capacity for both the proposed cultivation project and the residential use.

#### ⇒ Water Conservation

Water conservation practices will be implemented, including some combination of the following strategies and actions:

- selection of plant varieties that are suitable for the climate of the region;
- the use of driplines and drip emitters (instead of spray irrigation);
- mulching to reduce evaporation;
- water application rates modified from data from soil moisture meters and weather monitoring;
- rooftop water collection (where feasible and permitted);
- shutoff valves on hoses and water pipes;
- daily visual inspections of irrigation systems;
- immediate repair of leaking or malfunctioning equipment; and
- water metering and budgeting.

The cultivation operation will also use BMPs to assist with the water conservation efforts including:

- CASQA Construction BMP Fact Sheet NS-1: Water Conservation Practices will be implemented to prevent discharges from water supply equipment. Water application rates will be minimized as necessary to prevent runoff and ponding and water equipment leaks will be repaired immediately.
- Construction BMP Fact Sheet NS-7: Potable Water / Irrigation to manage the potential pollutants generate during discharges from irrigation lines and unplanned discharges from water sources.

⇒ Irrigation System

At the Jerusalem Grade cultivation site, the water supply will fill storage tanks; a well monitor and water meter will meter the water use. Water filtration and water heating systems may also be installed. This tank will supply gravitational head to the irrigation system. PVC pipes will deliver the water to the planting stations. Mixing tanks may be used to add liquid soil amendments or fertilizers and spliced into these supply lines. At each planting station, black polyvinyl flexible tubes and drip emitters will be used to irrigate the plants.

When this irrigation system is fully designed, this Plan will provide calculations of the efficiency of the irrigation system using the methodology of the Model Water Efficient Landscape Ordinance (California Code of Regulations, Title 23, Division 2, Chapter 27).

## **V. Lake County Zoning Ordinance**

The subject property is zoned RL – Rural District. According to Article 7, § 7.1 of the Lake County Zoning Ordinance, the purpose of this Zoning District Is to provide for resource related and residential uses of the County’s undeveloped lands that are remote and often characterized by steep topography, fire hazards, and limited access and to provide Zoning for lands in agriculture preserve and for the conservation and protection of land capable of producing agricultural products. Specifically permitted under the RL zoning standards are agricultural uses, including crop and tree farming, livestock grazing, animal husbandry, apiaries, aviaries (Article 7, § 7.3(b)). The uses specified in this section have been determined to be compatible uses consistent with the California Land Conservation Act of 1965. Further parceling of lands under Williamson Act contract is to be discouraged. Section 27.2 Table A indicates that outdoor cultivation of Cannabis is permitted within the RL Zoning District subject to approval of a Major Use Permit.

## **VI. Conformance with Lake County Cannabis Cultivation Regulations**

### **REPORTING**

According to the Lake County Cannabis Cultivation Ordinance, the licensee must perform annual compliance monitoring and prepare annual reports as follows:

⇒ **Compliance Monitoring**

- A compliance monitoring inspection of the cultivation site shall be conducted annually during growing season.
- The permittee shall pay a compliance monitoring fee established by resolution of the Board of Supervisors prior to the inspection.
- If there are no violations of the permit or state license during the first five years, the inspection frequency may be reduced by the Director to not less than once every five years.

⇒ **Annual Reports - Performance Review**

- All cannabis permittees shall submit a “Performance Review Report” on an annual basis from their initial date of operation for review and approval by the Planning Commission. The Planning Commission may delegate review of the annual Performance Review Report to the Director at the time of the initial hearing or at any time thereafter. This annual “Performance Review Report” is intended to identify the effectiveness of the approved development permit, use permit, Operations Manual, Operating Standards, and conditions of approval, as well as the identification and implementation of additional procedures as deemed necessary. In the event the Planning Commission identifies problems with specific Performance Review Report that could potentially lead to revocation of the associated development or use permit, the Planning Commission may require the submittal of more frequent “Performance Review Reports.”
- The premises shall be inspected by the Department on an annual basis, or less frequently if approved by the Director. A copy of the results from this inspection shall be given to the permittee for inclusion in their “Performance Review Report” to the Department.
- Compliance monitoring fees pursuant to the County’s adopted master fee schedule shall be paid by permittee and accompany the “Performance Review Report” for costs associated with the inspection and the review of the report by County staff.
- Non-compliance by permittee in allowing the inspection by the Department, or refusal to pay the required fees, or noncompliance in submitting the annual “Performance Review Report” for review by the Planning Commission shall be deemed grounds for a revocation of the development permit or use permit and subject the holder of the permit(s) to the penalties outlined in this Code.

**Other County Requirements**



The Lake County Board of Supervisors amended the Lake County Code to allow commercial adult use cannabis cultivation and it has adopted the rules and regulations set forth above.

These regulations are consistent with current State law and establish a program to be implemented in coordination with the State of California's Medical and Adult-Use Cannabis Regulation and Safety Act ("MAUCRSA").

This proposed cultivation project conforms to all of these state and County requirements for cultivation.

Additionally:

- The cannabis cultivation project will be built to California Building Code standards and will provide for a high level of security and safety consistent with the County regulations.
- The 42,000 square foot cultivation site will be situated in the center of a large parcel and will maximize property line setbacks from adjoining properties and structures in order to minimize perceived detrimental health, safety, morals, comfort, and general welfare impacts to people in the neighborhood and the region.
- The cannabis cultivation laws of the State of California and the County of Lake have been approved by the voters and thus reflects the current morality of most of the state's voters and Lake County region. The intent with regard to development of the cannabis cultivation project is to be sensitive to the morality and comfort and general welfare of the area by installing and operating state-of-the-art cannabis cultivation facilities and equipment in order to minimize detrimental impacts.
- The subject property is an existing agricultural use in an area. The proposed project involves a small footprint which is proportionate in size and impact than other agricultural activities in the vicinity.
- The subject site is topographically suitable which facilitates land development and it is provided with the full range of utilities, irrigation water, available land for accommodating septic facilities and storm water runoff without affecting adjoining land.

## **VII. Conclusion**

The management of the Jerusalem Grade cultivation has prepared and presented a comprehensive Major Use Permit application package including the completed County application form and supplemental questionnaire, *The Project Description and Suggested Findings* document, site plans, the Property Management Plan, photos, licenses, and associated exhibits in support of the approval of the Major Use Permit to develop and operate the Cannabis as requested.

The Major Use Permit application documents provide information concerning the project that supports approval of the Major Use Permit application.

There are considerable suggested findings herein and in the Property Management Plan that support approval of and the establishment of the cannabis cultivation project on the subject property.

The proposed cultivation project will help support agriculture and will help the County of Lake meet its goals of communicating the area's amenities.

The cannabis farm business income, the generation of significant County revenues, future employment opportunities, and the increased expenditure of employee's disposable income within Lake County, will all help enhance and maintain a healthy local economy and produce jobs.

The proposed project is consistent with and promotes the Lake County agricultural sector with a high end, well-designed cultivation area.

It is respectfully requested that the Lake County Planning Commission approve the Major Use Permit application for the proposed cultivation site based on the project application documentation and exhibits as submitted. Thank you for your consideration and approval.

Dated: September \_\_, 2019

Respectfully submitted,

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Maximilian Hopkins,  
Project Consultant

## References:

California Department of Food and Agriculture. 2018.  
CalCannabis Cultivation Licensing Program Draft Program Environmental Impact Report.  
State Clearinghouse #2016082077.  
Prepared by Horizon Water and Environment, LLC, Oakland, California. 484 pp.

California Stormwater Quality Association.  
2011. California Stormwater Best Management Practice Handbook – Construction. California  
Stormwater Quality Association, Menlo Park, California 886 pp.

California Stormwater Quality Association (CASQA).  
2014. Stormwater Best Management Practice Handbook Portal: Industrial and Commercial.  
California Stormwater Quality Association, Menlo Park, California. 474 pp.

Central Valley Region's Best Management Practices Manual for Cannabis Cultivation.  
Appendix A in: Waste Discharge Requirements for Cannabis Cultivation Order R5-2015-0113.

Lake County Groundwater Management Plan. 2006. Lake County Watershed Protection District.  
Prepared by CDM in Cooperation with California Department of Water Resources, Northern  
District. 138 pp.  
[http://www.co.lake.caf.us/Government/Directory/WaterResources/Programs/Groundwater\\_Management.htm](http://www.co.lake.caf.us/Government/Directory/WaterResources/Programs/Groundwater_Management.htm)

Newman, J. (editor). 2008. Greenhouse and Nursery Management Practices to Protect Water  
Quality. Publication Number: 3508. University of California Agriculture and Natural Resources  
Publications, Oakland, CA.

## **Exhibit 1**

### Lake County Cannabis Cultivation Ordinance #3073, Property Management Plan requirements

#### Air Quality

Intent: All cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District (LCAQMD).

In this section, permittees shall identify any equipment or activity that which may cause, or potentially cause the issuance of air contaminants including odor and shall identify measures to be taken to reduce, control or eliminate the issuance of air contaminants, including odors.

All cannabis permittees shall obtain Authority to Construct Permit pursuant to LCAQMD Rules and Regulations, if applicable, to operate any article, machine, equipment or other contrivance which causes or may cause the issuance of an air contaminant, prior to the construction of the facility described in the Property Management Plan. All permittees shall maintain an Authority to Construct or Permit to Operate for the life of the project, until the operation is closed, and equipment is removed.

The applicant shall prepare an odor response program that includes (but is not limited to):

- a. Designating an individual(s) who is/are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.
- b. Providing property owners and residents of property within a 1,000-foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.
- c. Policies and procedures describing the 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.
- d. The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.
- e. Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.

#### Cultural Resources

Intent: All permittees shall protect the cultural, historical, archaeological, and paleontological resources on the lot of record where the permitted activity is located.

This section shall describe the procedures to be followed if cultural, historical, archaeological, and paleontological resources are found on the property.

The Department will consult with appropriate Tribe regarding the potential of such resources being located on the lot of record. Based on that consultation, the Department may require a cultural resource study of the property to determine the extent such resources exist on the lot of record. The applicant will be responsible for paying the cost of such a study.

Based on that study and in consultation with the appropriate Tribe(s), the Department may require its findings and recommendations to be included in this section.

#### Energy Usage

Intent: Permittees shall minimize energy usage.

In this section permittees shall: a. Provide energy calculation as required by the California Building Code. b. Identify energy conservation measures to be taken and maintained including providing proof of compliance with CCR Title 3, Division 8, Chapter 1, Section 8305 the

Renewable Energy Requirements. c. If alternative energy sources are to be used, describe those sources and the amount of electricity that will be provided. d. For indoor cannabis cultivation licensees, ensure that electrical power used for commercial cannabis activity shall be provided by any combination of the following:

- (1) On-grid power with 42 percent renewable source.
- (2) Onsite zero net energy renewable source providing 42 percent of power.
- (3) Purchase of carbon offsets for any portion of power above 58 percent not from renewable sources.
- 4) Demonstration that the equipment to be used would be 42 percent more energy efficient than standard equipment, using 2014 as the baseline year for such standard equipment. e. Describe what parameters will be monitored and the methodology of the monitoring program.

#### Fertilizer Usage

Intent: To ensure consistency of fertilizer storage and use with the other sections of the Property Management Plan.

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

- a. Complying with all fertilizer label directions;
- b. Storing fertilizers in a secure building or shed;
- c. Containing any fertilizer spills and immediately clean up any spills;
- d. Applying the minimum amount of product necessary;
- e. Preventing offsite drift;
- f. Not spraying directly to surface water or allow fertilizer product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
- g. Not applying fertilizer when they may reach surface water or groundwater; and
- h. Nor 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.

For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.

This section shall include a map of the parcel where the cultivation site is located 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. This map shall include the location of where fertilizers will be stored and used.

A description what parameters will be monitored, and the methodology of the monitoring program shall be included in this section.

#### Fish and Wildlife Protection

Intent: To minimize adverse impacts on fish and wildlife.

In this section permittees shall include:

- a. 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;
- b. A description of the habitats found on the lot of record. These habitats shall be located on a map;
- c. A description of the watershed in which the permitted activity is located. A map shall be provided showing the full watershed;
- d. Describe how the permittee will minimize adverse impacts on the fish and wildlife; and

e. A map showing the location of any conservation easements or wildlife corridors proposed.

**Operations Manual**

Intent: To describe the operating procedures of the commercial cannabis cultivation site to ensure compliance with the use permit, protect the public health, safety and welfare, as well as the natural environment of Lake County.

This section shall include the following:

- a. Authorization for the County, its agents, and employees, 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. A description of the staff screening processes;
- c. The hours and days of the week when the facility will be open;
- d. Description of measures taken to minimize or offset the carbon footprint from operational activities;
- e. Description of chemicals stored, used and any effluent discharged as a result of operational activities;
- f. The permittee shall establish and implement 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:
  - The proper storage of equipment, removal of litter and waste, and cutting of weeds or grass so that the premises shall not constitute an attractant, breeding place, or harborage for pests.
  - 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.
  - The provision of adequate draining areas in order to prevent contamination by seepage, foot-borne filth, or the breeding of pests due to unsanitary conditions.
  - The provision and 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.
  - If 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.

#### **Pest Management**

Intent: To ensure consistency of pest management with the other sections of the Property Management Plan.

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

- a. Complying 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. Complying with all pesticide label directions;
- c. Storing chemicals in a secure building or shed to prevent access by wildlife;
- d. Containing any chemical leaks and immediately clean up any spills;
- e. Preventing offsite drift;
- f. Not applying pesticides when pollinators are present;

- g. Not allowing drift to flowering plants attractive to pollinators;
- h. Not spraying directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
- i. Not applying pesticides when they may reach surface water or groundwater;
- j. Using only properly labeled pesticides; and
- k. Not using pesticides within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.

This section shall include a map 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 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. This map shall include the location of where pesticides will be stored and used.

#### Security

Intent: To minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The Applicant shall provide adequate security on the premises, 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.

This section shall include at a minimum a description of the security measures to be taken to:

a. Prevent access to the cultivation site by unauthorized personnel and protect the physical safety of employees. This includes but is not limited to: ☐ A description of fences. ☐ Establishing physical barriers to secure perimeter access and all points of entry (such as locking primary entrances with commercial-grade, non-residential door locks, or providing fencing around the grounds, driveway, and any secondary entrances including windows, roofs, or ventilation systems); ☐ Installing a security alarm system to notify and record incident(s) where physical barriers have been breached; ☐ Establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors; ☐ Maintaining the premises such that visibility and security monitoring of the premises is possible; and ☐ Establishing procedures for the investigation of suspicious activities.

b. Prevent theft or loss of cannabis and cannabis products. This includes but is not limited to: ☐ Establishing an inventory system to track cannabis material and the personnel responsible for processing it throughout the cultivation process; ☐ Limiting access of personnel within the premises to those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties; ☐ Supervising tasks or processes with high potential for diversion (including the loading and unloading of cannabis transportation vehicles); and ☐ Providing designated areas in which personnel may store and access personal items.

c. Identification of emergency contact(s) that is/are available 24 hours/seven (7) days a week including holidays. This section shall include the name, phone number and facsimile number or email address of an individual working on the commercial cultivation premises, to whom notice of problems associated with the operation of the commercial cultivation establishment can be provided. The commercial cultivation establishment shall keep this information current at all times. The applicant shall make every good faith effort to encourage neighborhood residents to call this designated person to resolve operating problems, if any, before any calls or complaints are made to the County.

This section shall include 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.

d. A description of the required video surveillance.

(i) At a minimum, permitted premises shall have a complete digital video surveillance system with a minimum camera resolution of 1080 pixel. The video surveillance system shall be capable of recording all predetermined surveillance areas in any lighting conditions.

(ii) The video surveillance system shall be capable of supporting remote access by the permittee.

(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 and cannabis nursery; ☐ 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; ☐ 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. A description of the required fences.

(i) Any commercial cannabis cultivation 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, timber or concrete and may be driven into the ground or set in concrete. • End, corner or gate posts, commonly referred to as "terminal posts", must 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 screened from public view. Methods of screen may include, but is not limited to, topographic barriers, vegetation, or solid (opaque) fences.

#### Storm Water Management

Intent: 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.

This section shall include at a minimum:

a. Provide written and graphic representation of how storm water runoff will be managed to protect downstream receiving water bodies from water quality degradation.

b. Provide written and graphic representation of how the applicant will comply 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 as appropriate.

c. Provide written and graphic representation showing the outdoor cultivation, including any topsoil, pesticide or fertilizers used for the cultivation cannabis shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.

d. Provide written discussion describing how the illicit discharges of irrigation or storm water from the premises, as defined in Title 40 of the Code of Federal Regulations, Section 122.26, which could result in degradation of water quality of any water body will be prevented.

e. Identify of any Lake County maintained drainage or conveyance system that the stormwater is discharged into and documentation that the stormwater discharge is in compliance with the design parameters of those structures.

f. Identify of any public roads and bridges that are downstream of the discharge point and documentation that the stormwater discharge is in compliance with the design parameters of any such bridges.

g. Provide documentation that the discharge of stormwater from the site will not increase the volume of water that historically has flow onto adjacent properties.

h. Provide documentation that the discharge of stormwater will not increase flood elevations downstream of the discharge point.

i. Provide documentation of compliance with the requirements of Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance Code.

j. Describe the proposed grading of the property.

k. Describe the best management practices (BMPs) that will be used during construction and those that will be used post-construction. Post-construction BMPs shall be maintained through the life of the permit; and

l. Describe what parameters will be monitored and the methodology of the monitoring program.

#### Waste Management

Intent: 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.

This section shall include the following components:

#### Solid Waste Management

The solid waste management section shall include:

Provide an estimate of the amount of solid waste that will be generated on an annual basis and daily during peak operational seasons, broken down into the following categories:

- Paper
- Glass
- Metal
- Electronics
- Plastic • Organics
- Inerts
- Household hazardous waste
- Special waste, and
- Mixed residue

Describe how the permittee will minimize solid waste generation, including working with vendors to minimize packaging.

Describe the waste collection frequency and method.

Describe how solid waste will be temporarily stored prior to transport to a compost, recycling, or final disposal location.

Describe the composting, recycling, or final disposal location for each of the above categories of solid waste.

#### Hazardous Waste Management

The hazardous waste section shall include:

##### (1) Hazard Analysis.

The applicant shall conduct a hazard analysis to identify or evaluate known or reasonably foreseeable hazards for each type of cannabis product produced at their facility in order to determine whether there exist any hazards requiring a preventive control. The hazard analysis shall include:

The identification of potential hazards, including:

- Biological hazards, including microbiological hazards;
- Chemical hazards, including radiological hazards, pesticide(s) contamination, solvent or other residue, natural toxins, decomposition, unapproved additives, or food allergens; and/or
- Physical hazards, such as stone, glass, metal fragments, hair or insects.
- The evaluation of the hazards identified in order to assess the severity of any illness or injury that may occur as a result of a given hazard, and the probability that the hazard will occur in the absence of preventive controls.
- The hazard evaluation shall consider the effect of the following on the safety of the finished cannabis product for the intended consumer:
  - The sanitation conditions of the manufacturing premises;
  - The product formulation process;
  - The design, function and condition of the manufacturing facility and its equipment;
  - The ingredients and components used in a given cannabis product;
  - The operation's transportation and transfer practices;
  - The facility's packaging and labeling activities;
  - The storage of components and/or the finished cannabis product;

- The intended or reasonably foreseeable use of the finished cannabis product: and any other relevant factors.

## (2) Management Plan

The Management Plan shall:

Identify all Resource Conservation and Recovery Act (RCRA), Non-RCRA hazardous waste and Universal wastes and the volume of each:

- Identify all containers and container management;
- Describe storage locations and chemical segregation procedures;
- Describe hazardous waste manifest and recordkeeping protocol;
- Outline inspection procedures;
- Identify emergency spill response procedures;
- Describe staff responsibilities;
- Describe the staff training program;
- Describe the methodology on how the amount of hazardous materials and waste that is generated on the site, the amount that is recycled, and the amount and where hazardous materials and waste is disposed of, is measured; and
- Include A map of 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. The map shall also include any public water supply well 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.

Pursuant to the California Health and Safety Code, the use of hazardous materials shall be prohibited except for limited quantities of hazardous materials that are below State threshold levels of 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas. The production of any Hazardous Waste as part of the cultivation process is prohibited.

### Cannabis Vegetative Material Waste Management

The cannabis vegetative material waste management section shall:

Provide an estimate of the type and amount of cannabis vegetative waste that will be generated on an annual basis;

Describe how the permittee will minimize cannabis vegetative waste generation;

Describe how solid waste will be disposed; and

Describe the methodology on how the amount of cannabis vegetative waste that is generated on the site, the amount that is recycled, and the amount and where cannabis vegetative waste is disposed of is measured.

The growing medium management section shall: • Provide an estimate of the type and amount of new growing medium that will be used, and amount of growing medium will be disposed of on an annual basis:

- Describe how the permittee will minimize growing medium waste generation.
- Describe any non-organic content in the growing medium used (such as vermiculite, silica gel, or other non-organic additives; Describe how growing medium waste will be disposed.
- Describe the methodology on how the amount of growing medium waste that is generated on the site, the amount that is recycled, and the amount and where growing medium waste is disposed of, is measured.

## Water Resources

Intent: To minimize adverse impacts on surface and groundwater resources.

This section shall include:

- a. A description of the surface and groundwater resources that are located on the lot of record where the permitted activity is located.
- b. A description of the watershed in which the permitted activity is located.
- c. A description of how the permittee will minimize adverse impacts on the surface and groundwater resources.
- d. A description of what parameters will be measured and the methodology of how they will be measured.
- e. A map 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 200 feet of the lot of record.
- f. A topographic map of the parcel prepared by a licensed surveyor where the permitted activity is located with contours no greater than five (5) feet.

## Water Use

Intent: To conserve the County's water resources by minimizing the use of water.

- (b) All permitted activities shall have a legal water source on the premises, and have all local, state, and federal permits required to utilize the water source. If the permitted activity utilizes a shared source of water from another site, such source shall be a legal source, have all local, state, and federal permit required to utilize the water source, and have a written agreement between the property owner of the site where the source is located and the permitted activity agreeing to the use of the water source and all terms and conditions of that use.
- (c) Permittee shall not engage in unlawful or unpermitted drawing of surface water.
- (d) The use of water provided by a public water supply, unlawful water diversions, transported by a water hauler, bottled water, a water-vending machine, or a retail water facility is prohibited.
- (e) Where a well is used, the well must be located on the premises or an adjacent parcel. The production well shall have a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. The methodology of the monitoring program shall be described. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The monitoring wells shall be constructed, and monitoring begun at least three months prior to the use of the supply well. An applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually.
- (f) Water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The application shall notify the Department within 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.

This section shall:

- Identify the source of water, including location, capacity, and documentation that it is a legal source.
- Describe the proposed irrigation system and methodology.

- Describe the amount of water projected to be used on a monthly basis for irrigation and separately for all other uses of water and the amount of water to be withdrawn from each source of water on a monthly basis.
- Provide calculations as to the efficiency of the irrigation system using the methodology of the Model Water Efficient Landscape Ordinance (California Code of Regulations, Title 23, Division2, Chapter 27).
- Describe the methodology that will be used to measure the amount of water used and the required monitoring

#### Storm Water Management Plan

Erosion control, also referred to as soil stabilization, consists of source control measures that are designed to prevent soil particles from detaching and becoming transported in storm water runoff. Erosion control BMPs protect the soil surface by covering and/or binding soil particles. Water Pollution Control BMPs will be deployed in a sequence to follow the progress of site preparation / tilling / cultivation. As the locations of soil disturbance change, erosion and sedimentation controls will be adjusted accordingly to control storm water runoff at the downgrade perimeter and drain inlets.

BMPs will be mobilized as follows:

Year-round:

- The Jerusalem Grade site manager will monitor weather using National Weather Service reports (<https://www.weather.gov/>) to track conditions and alert crews to the onset of rainfall events.
- Prior to forecasted storm events, temporary erosion control BMPs will be deployed and inspected.
- Preserve existing vegetation where required and when feasible.

During construction:

- Apply temporary erosion control to exposed areas. Reapply as necessary to maintain effectiveness;
- Implement temporary erosion control measures at regular intervals throughout the defined rainy season to achieve and maintain stability. Implement erosion control prior to the defined rainy season;
- Control erosion in concentrated flow paths by applying erosion control devices.
- Divert run-on and stormwater generated from within the facility away from all erodible materials; and
- If sediment traps or basins are installed, ensure that they are working properly and emptied of accumulated sediment and litter.
- Disturbed soil areas will be stabilized with temporary erosion control or with permanent erosion control as soon as possible after grading or construction is complete.
- During the rainy season disturbed areas will be stabilized with temporary or permanent erosion control before rain events.

Post-Construction:

- Disturbed areas that are substantially complete will be stabilized with permanent erosion control (soil stabilization) and vegetation (if within seeding window for seed establishment).
- Sufficient quantities of temporary sediment control materials will be maintained on-site throughout the duration of the project, to allow implementation of temporary sediment controls

in the event of predicted rain, and for rapid response to failures or emergencies. This includes implementation requirements for active areas and non-active areas before the onset of rain. Implementation of rainy season BMPs: Installation to occur by October 1st of every year. Rainy season begins October 15.

Implementation of dry season BMPs: By April 1st of every year. Dry season begins April 15.

Erosion control devices will be maintained and repaired or replaced as needed.

Specific erosion control BMPs that will be implemented are listed here and the BMP fact sheets are included in this Exhibit:

- EC-2: Preservation of Existing Vegetation
- EC-3: Hydraulic Mulch
- EC-4: Hydroseeding
- EC-5: Soil Binders
- EC-6: Straw Mulch
- EC-7: Geotextiles & Mats
- EC-8: Wood Mulching
- EC-9: Earth Dikes & Drainage Swales
- SC-33: Outdoor Storage of Raw Materials
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip

Erosion and sediment control diagrams are provided in the Maps portion of Section 9 of the PMP which indicate the recommended type and placement of erosion control devices. Sediment controls are designed to intercept and settle out soil particles that have been detached and transported by the force of water. This project will incorporate sediment control measures as needed.

Specific sediment control BMPs that can be implemented are as follows:

- SE-1: Silt Fence
- SE-3: Sediment Trap
- SE-5: Fiber Rolls
- SE-6: Gravel Bag Berm
- SE-8: Sand Bag Barrier
- E-9: Bale Barrier
- TC-32: Bioretention

Best Management Practices Resources consulted for BMP selection included:

Central Valley Region's Best Management Practices Manual for Cannabis Cultivation. Appendix A in: Waste Discharge Requirements for Cannabis Cultivation Order R5-2015-0113.

California Stormwater Quality Association. 2011. California Stormwater Best Management Practice Handbook – Construction. California Stormwater Quality Association, Menlo Park, California 886 pp.

California Stormwater Quality Association. 2014. Stormwater Best Management Practice Handbook Portal: Industrial and Commercial. California Stormwater Quality Association, Menlo Park, California.

The California Department of Transportation's Construction Site BMPs Handbook, available electronically: <http://www.dot.ca.gov/hq/construc/stormwater/manuals.htm>

The California Department of Transportation's Construction Site BMP Fact Sheets, available electronically: <http://www.dot.ca.gov/hq/construc/stormwater/factsheets.htm>

USEPA NPDES Storm Water Program's National Menu of BMPs website:  
<http://www.epa.gov/npdes/stormwater/menuofbmps>