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SEP 18 2019

LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT.

September 7, 2019

Badlands LLC Permit Application Written Description

- a. Written section (shall support graphic representations)
 - i. Project description: Discing, tilling, and cover cropping proposed canopy area. Erecting a fence to surround the entire canopy as well as security gates and cameras. Attach main pipe to existing water pump, placing irrigation lines. Planting 12-acres of cannabis.
 - ii. Present zoning of all APN's affiliated with the project is RL
 - iii. List and description of all uses shown on site plan: Currently 4-acre canopy of cannabis cultivation onsite. Proposed use is for additional commercial cannabis cultivation.
 - iv. Development schedule including permit phase:
 - 1. 2019 SEPTEMBER – MID OCTOBER: Discing, and cover cropping proposed canopy area. Drilling a well for an additional water source.
 - 2. 2019 SEPTEMBER – MID OCTOBER: Turn in Major Use Permit with hopes to have planning commission hearing prior to March 2020. Received grading exemption for standard farming practices on the subject parcel.
 - 3. 2019 MID OCTOBER – MID NOVEMBER: Work with SWRCB to implement winterization measures for erosion control. Possibly gravel areas of need.
 - 4. 2020 MID APRIL – MID MAY: Till in cover crop. Erect fence and security system. Gravel all remaining needed areas. Setup all additional storage and restroom facilities. Setup additional waterline from existing pump. Complete all irrigation and Dosatron setup. Once all is setup, plant 12-acres of cannabis.
 - v. Statement of applicant's proposal:
 - 1. I have a proposal for a waste management plan which covers:
 - a. Solid waste disposal
 - b. Vegetative waste disposal
 - c. Growing medium management
 - 2. I have a proposal for a storm water management plan
 - 3. I have a proposal for water resources protection in the water resources management plan
 - 4. I have a proposal for fish and wildlife protection in the fish and wildlife management plan
 - 5. I have a proposal for energy use in the energy management plan
 - 6. I have a proposal for a water use management plan
 - 7. I have a proposal for fertilizer management plan which covers organic farming as well
 - 8. I have a proposal for pest management plan
 - 9. This project will require no grading
 - 10. I have a proposal for an overall property management plan

11. I have a proposal for cultural resources protection in the cultural resources management plan

vi. Quantitative data for the development:

1. Gross acreage of all three parcels that make the legal lot of record is 585.77, the gross acreage of the subject parcel is 333.4-acres, with the net acreage of cultivation at 13.
2. Dimensions and location of structures for each area: There are no permanent structures proposed for this project. Simply storage units and porto-pottys.
3. Employee statistics include four full time workers that will be there daily throughout the cultivation process. Eight additional people will be needed during planting and harvesting. These individuals will either be employees of badlands LLC or will be sub-contracted out for the short period of time that they will be needed. All individuals employed by badlands LLC will be background checked with the County of Lake Sheriff's Department.
4. Support services required are for porto potties which will be for maintenance and cleaning services on a needed basis. The company that I will choose to conduct these services will be addressed once I decide on which one to use, it is also dependent on purchase or rental of the facilities.
5. Traffic generation data based on anticipated uses is as follows:
Throughout an entire year, the total vehicle trips are estimated at 621 total trips. This includes all employee traffic, pickups, deliveries, etc.. This total traffic averages less than two vehicles a day. The levels of traffic vary considerably throughout the year with the highest rate during prep and harvest season, no traffic during winter months, and very minimal traffic at all other times.
6. Parking and loading requirements are as follows. There is a proposal of 12 parking spots along with an ADA compliant parking area as well. This will be enough to accommodate all employees or visitors during the period of time with the highest demand of individuals onsite. Car-pooling is encouraged and will help to cut down traffic, needed parking areas, as well as carbon emissions. Loading zone will be 16' X 40', large enough to accommodate the cannabis transportation vehicles that will be picking up the product.
7. Outdoor storage requirements based on anticipated uses include weather proof storage units that will fully enclose all soil amendments, petroleum, etc.. All storage units will be located outside of required setbacks pursuant to the SWRCB's General Order and Policy as well as Ordinance 3084 of Lake County.

vii. Supplemental information

1. Water Board
 - a. General Order Enrollment is attached.

- b. Small irrigation use registration is not required for this project (attached).

2. CDFW

- a. No additional LSA agreement is required for this project as the original LSA agreement covers the current diversion point as well as both of the reservoirs that are used for storage (attached).

3. County of Lake well permit

- a. Drilling should take place by mid-October at the latest and information will be updated once received.

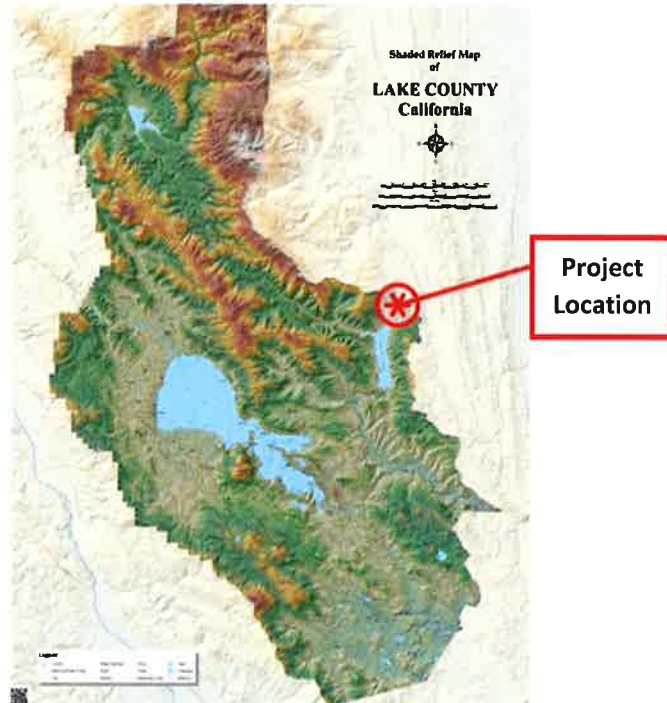
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LAKE COUNTY COMMUNITY
DEVELOPMENT DEPT.

Property Management Plan

Air Quality, Grounds, Security, Stormwater Management, Waste Management, Water Use and
Resources



Preparation Date:
September 2019

Prepared for:
Badlands LLC
APN: 016-032-01
21518 Bartlett Springs Rd.
Lucerne, California 95485

Prepared by:
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1.0 Purpose and Scope of Report

This document has been created to demonstrate full compliance with Lake County's Ordinance 3084, Amending Chapter 21, Article 27 of the Lake County Code Pertaining to Cannabis Cultivation and the regulations set forth by the CalCannabis Cultivation Licensing division of the California Department of Food and Agriculture. You will find in this report all information to be consistent with all applicable County and State regulatory requirements. The plans within this document are intended to be "living," which allows for the modification of operational processes to be made for the betterment of the project. The alteration of these plans will be triggered by any significant change in operational activities. These amendments may be caused by the adjustment of project goals, the modification to the County Ordinance or State law, whenever a process is considered ineffective for its intended purpose or found to be dangerous to the environment or staff. In compliance with the Lake County Ordinance any changes in or deviations from the Management Plans developed in this document shall be conveyed to Lake County in writing within thirty (30) days of the alteration.



The following Property Management Plans have been developed to illustrate how the activities related to the commercial cultivation of cannabis on the lot of record will not harm the surrounding area's natural environment or the public's health, safety, or welfare. The plans for each section of this project have been developed to satisfy the specific intentions of the Lake County Ordinance. The intent of the Ordinance for each section is as follows:

- Air Quality
 - "All cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District (LCAQMD)."
- Grounds Maintenance
 - "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."
- Security
 - "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."
- Stormwater Management
 - "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."
- Waste Management
 - "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."
- Water Use

- “To conserve the County’s water resources by minimizing the use of water.”
- Water Resources
 - “To minimize adverse impacts on surface and groundwater resources.”

2.0 Methods Implemented to Develop Report

2.1 The office components used to create this plan consisted of:

- Review of Maps
 - USGS Topographical map study
 - USGS 7.5 Minute Quadrangle map
 - USGS Geological Maps
 - FEMA, USGS Flood Zone Maps
 - USGS Fault Lines
 - USDA, NRCS Soil Maps
 - BLM Slope and Terrain Maps
 - Lake County Commercial Cannabis Cultivation Exclusion Areas
 - Lake County Zoning
 - Various Historical Lake County Maps
 - BLM Public Land Survey System Maps
 - USGS Watershed maps
 - Google Earth Satellite Imagery
- Review of various scholarly articles, compliance manuals, state certified handbooks
 - History of the Indian Valley and Bartlett Springs Area
 - Habitats on parcel and surrounding areas
 - Review of native plant and animal species specific to the habitats
 - History and current conditions of Cache Creek Watershed
 - Road construction and maintenance
 - Construction Best Management Practices
 - Stormwater Best Management Practices
- EnviroStor Database Search
- Native American Sacred Lands Search
 - Native American Heritage Commission
 - State Water Resources Control Board
- Communication with various Lake County Departments
 - Review of any permits, reports, rights, or other records including easement, well, or grading permits filed for the lot of record and adjacent parcels through Lake County Assessor's Office, Recorder's Office, Surveyors Office, and Environmental Health Office, Planning Department, Fire Department, and Sheriff Department
- Communication with CalCannabis Licensing Division of the California Department of Food and Agriculture
- Communication with California Department of Fish and Wildlife
 - Consultation from Cannabis Cultivation Division
 - Consultation from environmental scientists in regional office
- Communication with State Water Resources Control Board
 - Consultation from Water Rights Division
 - Consultation from Water Quality Division
 - Consultation from Central Valley Regional Water Board
- Consultation from the Conservation Technical Assistance Program through the NRCS

- Review of all Conservation Practice Standards
- Development of a four year, 333-acre parcel wide conservation plan
- Review of written public soil surveys provided through NRCS
- Consultation from various water rights firms, lawyers, and engineers
 - Review of various applicable water codes and water laws

2.2 The field components used to create this plan consists of:

- Onsite inspection conducted by CDFW
 - Assessment of point of diversion from reservoirs
 - Assessment of habitats in areas adjacent to reservoirs and cultivation areas
- Onsite inspection conducted by Regional and State Water Resources Control Board
 - Confirmation on water rights, and amount of storage in existing reservoirs
 - Assessment of streams, reservoirs and habitats on property
 - Confirmed access roads on property met State Standards under set forth in the *Handbook for Forest, Ranch, and Rural Roads*
 - Assessment of activities to conduct to minimize sediment discharge
 - Assessment of locations of canopies and setbacks to adjacent water courses
- Onsite inspection conducted by Jack Smalley of Lake County Planning Department
 - Confirmed that access roads meet all standards set forth by CalFire including gate size, road width, amount and type of gravel, and turnout locations
 - Confirmed ADA compliance of restrooms onsite
- Onsite consultation from Professional Geologist
 - Assessment and mapping of geology within proposed cannabis cultivation area
 - Assessment and mapping of existing roads and drainage techniques
 - Assessment of erosion control areas
 - Assessment and mapping of road grades
- Onsite consultation from Professional Biologist
 - Assessment and mapping of terrestrial habitats
 - Identification of flora and non-native vegetation
 - Identification of vegetative growth stages of various areas on parcel
 - Identification of fauna on subject parcel
- Onsite consultation from representative of the NRCS
 - Assessment of areas most important to implement immediate re-vegetation
 - Assessment of soils to conclude the best seed mixes to use for re-vegetation
- Physical reconnaissance of all hydrological and terrain elements before during and following periods of high precipitation
- Identifying and visually assessing all surface waters on or adjacent to cultivation site
- Identifying and mapping cultivation site access road beginning at the parcel line
- Identifying and mapping all current or proposed sites for cannabis cultivation related structures
- Measuring of precipitation rates
- Measuring of both existing reservoirs
 - Total full capacity
 - Winter Storage capability
- Collecting water and soil samples from cultivation site

- Specifically assessing all potentially problematic areas to help prioritize preventative and permanent measures to protect natural resources on the parcel

3.0 Project Location and General Description

This project is located on an individual parcel located roughly 2.5 miles north of Indian Valley Reservoir near the Colusa County Line. The subject parcel's APN is 016-032-01 and the address of the property is 21518 Bartlett Springs Road, Lucerne, CA, 95485. There is currently a 4-acre outdoor commercial cannabis cultivation permit in use on the subject parcel (UP-18-42). This parcel is part of a group of three parcels that make up the legal lot of record as portrayed in the Certificate of Compliance filed and recorded on January



14th of 2019. The total acreage of all three parcels is 585.8-acres. All parcels are zoned rural (RL) land and the subject parcel is one of very few parcels in this area with this zoning to be located outside of the Combining Exclusionary Map area of Lake County. The zoning of all surrounding parcels is either Rural Land (RL) or Open Space (O). The majority of these surrounding areas are controlled by the Bureau of Land Management (BLM) and designated as Wilderness Areas. The surrounding parcels not controlled by BLM have been vacant by the landowners for close to a decade. These surrounding lands create a uniquely remote location for the project, lending well to the minimization of the two most prevalent issues with commercial cannabis cultivation; security and odor. The water resources of the lot of record are part of the Cache Creek watershed. A legal point of diversion has been established with the CDFW for the parcel

and the property is enrolled in the State Water Resources Control Board's General Order. Two reservoirs have existed on the property for over 50 years, totaling 23-acre feet of water storage. The rights to beneficially use 20-acre feet of this water stored for irrigation purposes is allowed under the water right (Application # A021224) held by the property owner. The entirety of the subject parcel is 333.36 acres with all cannabis related activities concentrated on the westernmost 40-acres of the parcel. The soils located within the proposed cultivation site are predominantly Maxwell Clay Loam (2-8%) slopes with smaller pockets of Henneke-Okiota complex, 30 to 50 percent slopes in certain locations as well. The natural land slopes never exceed 16% in any areas where cannabis cultivation activities will be being performed. The primary habitat of this area, California Chaparral provides a healthy environment for a variety of shrubland vegetation and wildlife in the area. The entire parcel was burned

in the Mendocino Complex Fire which left nearly none of this vegetation alive. The land owners are working closely with the National Resource Conservation Services to implement a parcel wide conservation plan for this land. There is also large-scale planting effort planned to occur this fall to bring back native grasses, wildflowers, shrubs, and trees in the area. The SWRCB and the NRCS are playing pivotal roles in the development of the scheduling and the decided upon areas where these plantings will occur.

The project requires no grading and minimal construction leading to a very low environmental impact to the lands where cultivation activities will occur. Standard farming practices covering discing and tilling will be conducted to prepare the subject areas for the expanded canopies. The property currently has a grading exemption on file with the Lake County Community Development to conduct these activities. The canopy under this project is going to total 12-acres planted in the 2020 growing season. With no proposed propagation onsite and harvesting activities occurring off site at a licensed facility, the total cultivation area as defined in the Lake County Ordinance 3084 is as follows; 522,720 sq.'(canopy) + 200 sq.' (cannabis veg. waste area) + 640 sq.' (cannabis plant loading zone). This total space to be assessed annual tax rates at \$1/sq.' is 523,560 sq.' total cannabis cultivation area. This document itself, the overall project, and the entire 333-acres of land that makes up this subject parcel will continue to evolve and improve throughout the 10-year duration of this major use permit.

4.0 Air Quality

The emittance of odor from a cultivation site is responsible for many of the negative issues and potential problems correlated with commercial cannabis cultivation. The release of odor from a cultivation site creates three main problems. The first problem is that it creates a nuisance for anyone who is allergic to or otherwise bothered by the smell of the cannabis flower. This puts a burden on Lake County officials to address these nuisance complaints. Secondly, sites producing odors nearby schools or other places children are present may expose youths to this plant, creating a higher likelihood of cannabis being consumed by a minor. The repercussions of this are hard to quantify, however, this would undoubtedly create a burden on the County and the community as a whole. Lastly, the emittance of cannabis odor may attract people to the site, attempting to steal either cash or valuable plants. This security threat creates a higher risk of crimes including burglary, trespassing, robbery and armed robbery. Lake County has carefully crafted a cultivation exclusion zone with the subject of odor being one of the most important variables in doing so. The extreme isolation of this project within the acceptable boundaries logically eliminates odor as a realistic issue created by this project. The following information shall support this fact as well as illustrate the very minimal impact that this project shall have on air quality. This project shall do its part in keeping Lake County's air quality ranked as the fourth cleanest county in the entire United States.

4.1 Influence of Location and Natural Environment of Project

The 333.36-acre parcel where the proposed outdoor cannabis cultivation site is located is in a remote rural location void of any residences with no consistent presence by any person at any time. All neighboring parcels are without residences and all neighboring owners that were able to be contacted have absolutely no intention of conducting activities of any kind on their respective lands in the future. This creates an environment where currently there is very minimal to absolutely no chance that the issue regarding odor as a nuisance will be raised by anyone within a reasonable distance from the cannabis cultivation site on the subject parcel.



The presence of wildlife and the topography of the subject parcel and surrounding parcels consisting of many canyons, trees, mountains, streams, and shrubs create a natural, outdoor aromatic presence throughout the area. This is further evidence that individuals will most likely never even have the ability to smell any emitting odors from the cultivation site on the subject parcel.

The zoning of all surrounding parcels is either Rural Lands (RL) or Open space (O). The only other zoning in Lake County that

is present within an eight-mile radius from the subject parcel is Agricultural Preserve Zone (APZ). The purposes of these zones as stated in their respective articles in chapter 21 of the Lake County Zoning Ordinance are as follows:

- RL-Purpose: 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.
- O-Purpose: To provide a zoning district to preserve, protect, and enhance public and private lands for their resource production potential and environmentally sensitive animal and plant habitat; while providing access to publicly owned lands and reducing land use conflicts by limiting uses incompatible with the purposes of this district.
- APZ- Purpose: To provide zoning for lands in agriculture preserve and for the conservation and protection of land capable of producing agricultural products. The uses specified in this section have been determined to be compatible uses consistent with the California Land Conservation Act of 1965. Further parcelization of lands under contract shall be discouraged.

These zoning purposes and the uses permitted on these lands put forth by Lake County lends well to the fact that there will be minimal to no odor complaints regarding the cultivation on the subject parcel throughout the entire 10-year duration of the major use permit that is currently being amended.

Despite the apparent fact that an odor nuisance issue now or in the future should never surface; an odor response program has still been created and will be implemented once cultivation activities begin. The following are the policies and procedures set forth by the applicants regarding odor complaints:

4.2 Odor Response Program

- Proactively contacting all adjacent landowners to give them contact information of the onsite manager as well as the owner of badlands LLC and the other property owner. Giving these adjacent landowners three contacts is to ensure that the issue is communicated and resolved in the timeliest fashion. These individuals are responsible for responding to odor complaints 24-hours per day/7 days a week in the order they are listed.
 - Onsite Manager- TBD
 - Property and LLC Owner-Damien Ramirez cellular phone number: 602.672.7265
 - Property Owner-Anthony Contento cellular phone number: 650.814.3199
- The adjacent property owners will be encouraged to contact any of the above listed individuals if any odor nuisance is experienced by them as a result of the activities conducted on the subject parcel.
- In the event that a call is received the caller will be asked for the date, time, location, and type of odor that was physically detected.
- The caller will be asked to rate the intensity of the odor on a scale of 1-5 with 1 being mildly observed and 5 being physically obtrusive and almost unbearable.
- This information from the caller along with the weather and wind direction at the time the nuisance occurred will be documented in an odor complaint log.
- This information will be maintained by the property owners and complaints will be reported to the county if the issue persists.
- Badlands LLC will defer to the Lake County Air Quality Management District (LCAQMD) regarding what actions need to be taken to address the issue.
- The odor complaint log will be made available to any applicable agency at any time.
- Contingency methods have not been created due to the high un-likelihood that any odor complaint will ever be received.

4.3 Identification of all Equipment or Activities that May Cause the Issuance of Air Contaminants

- Limited site preparation activities shall produce minimal amounts of fugitive dust during site preparations.
 - Heavy equipment uses such as tractors and backhoes shall be required in the development of this project. These activities shall be for standard agricultural practices such as the discing, tilling, and digging holes for the expanded canopy area. All emission generating activities will be cleared with the LCAQMD.
 - These activities include building of storage sheds, adding an additional main pipe connected to the existing project's pump, placing of above ground irrigation lines, and other activities that do not create ground disturbance
 - All dust generating activities will be accompanied by mitigation measures of water application to minimize dust
- Emissions created offsite include exhaust and dust created by vehicle traffic arriving and departing the site.
- Emissions created onsite are primarily exhaust emissions (NOX, CO, ROG, PM10, and PM2.5)

- Existing water pump connected to a 5hp Baldor Reliance Industrial Motor approved by CDFW during LSA Agreement drafting. Ran as needed, roughly one hour per day.
- EPA and CARB certified DR gasoline wood chipper which will be operated for a projected duration of only one hour per month.
- Only vehicles and equipment which are currently up to California emissions standards will be allowed on the parcel. Currently, the projected daily average of all vehicles that will access the subject parcel throughout the entire year is just under two (1.7) vehicles per day for the entire year. This average is derived from all projected activities that will be required to cultivate cannabis throughout the year from the site preparation stage to the harvesting stage. These vehicles' engines will only be running to arrive and depart from the site using the access road. This average daily traffic is nearly eight trips less than what an average single-family dwelling creates according to 2009 Transportation Data.

4.4 Measures Taken to Reduce, Control, or Eliminate the Issuance of Air Contaminants

The applicants have developed standard operating procedures (SOP) for all employees and visitors that will be present on site for any amount of time for the entire duration of all cultivation activities including preparation. All employees and visitors will be briefed regarding these procedures created to aid in the preservation of the high-quality air of Lake County.

- Water shall be used efficiently and effectively to control emissions of fugitive dust during site preparation activities.
- All vehicles and equipment will not be left idling at any time, always use vehicle/equipment for intended purposes in a timely fashion and immediately shut down.
- Only use gasoline dependent items for necessary purposes and for the time needed.
- Water pump use will be minimized through various techniques.
 - Utilization of gravity will be implemented whenever possible in irrigation designs.
 - Water conservation techniques in cultivation will be utilized to lower water demands for plant growth.

There are additional current and future standards and practices that further contribute to the reduction, control, or elimination of the issuance of air contaminants within the Operation's Manual for this project.

4.5 Early Activation and Steps to Obtain an Authority to Construct Permit

Pursuant to the LCAQMD Rules and Regulation, the hardcopy of the original Authority to Construct Permit Application will be turned in and signed in a timely fashion. Following that, the applicant will provide the LCAQMD staff assigned to my project all other required information along with payment. Following a favorable planning commission hearing for this project, the signed conditions of approval for the Major Use Permit and Initial Study will be turned in immediately to LCAQMD staff. This project, as the previous project on this subject parcel shall meet all requirements set forth to constitute an early activation. The applicant is aware of the serpentine soils on the subject parcel and will utilize all additional dust mitigation as recommended by Fahmy Attar from the LCAQMD. An Authority to Construct permit will be obtained and maintained for the life of the project as directed by Ordinance 3084 as soon as the Board of Supervisors decide on how the fee structure will be determined.

5.0 Grounds Maintenance

It is imperative for this project that the grounds of this parcel are kept in a condition that prevents the contamination of components and cannabis products. The applicant has established and implemented written procedures that will prevent anywhere on the parcel to become contaminated. With the strict testing procedures required by the CDFA the applicant views a clean workplace as the utmost of importance. Throughout the Property Management Plans you will find evidence of these procedures within the Stormwater Management, Water Resources, and Waste Management sections of the document.

5.1 Proper Storage of Equipment, Removal of Litter and Waste, and Cutting of Weeds or Grass

You will find a variety of procedures, methods, and standards to ensure that the immediate grounds of the cultivation site as well as adjacent areas are kept in a condition that prevents the contamination of components and cannabis products. Storage and locations of all chemicals and equipment are in protected and segregated areas, kept safe distances away from the cultivation canopy. Weeds and grass in the cultivation area and surrounding areas will be monitored and cut with a line trimmer. A monitoring and cutting schedule will be developed and implemented once cultivation related activities commence. Crop cover, mulching, and other weed control measures will be made during periods in between grow seasons. It is to the utmost importance that the entire cultivation area is kept in a manner that never constitutes an attractant, breeding place, or harborage of pests at any time.

5.2 Proper Maintenance of Roads, Yards, and Parking Lots to Prevent Contamination

Jack Smalley from the Lake County Building Department has assessed the current access road in July of 2019. He acknowledged that the width of the road and gates, the amount of gravel, the drainage techniques, and the location of the turnouts within (400' of each other) all met the standards set forth in the Sections 4290 and 4291 of the Public Resources Code. Reflective signage with 4" lettering have been installed at the entrance of the easement off of Bartlett Springs Rd as well as when you cross the subject parcel's parcel line. Roads, culverts, parking, loading, and unloading areas on the subject parcel will be monitored and maintained on a scheduled basis. There are trash cans strategically located in some of the most commonly used areas such as parking. Season, use, and weather will all be determining factors in the development of the maintenance schedules. Proper speed limits of 5 mph during ingress and egress on the property has been implemented and will continue to be enforced as to maintain the integrity of the gravel on the roads and other areas. These access roads, turnouts, stream crossings, and parking areas have all been approved to meet both CalFire and SWRCB's General Order standards through onsite inspections by the respective agencies. Periods of time with high precipitation levels will always prompt monitoring and maintenance activities independent of pre-developed scheduling. Road and culvert assessment and maintenance will be conducted with assistance by a qualified professional Geologist before and after the winter period of each year. All present or future structures permanent or not that are erected onsite will be continually monitored to check if, when, and how maintenance will be needed to ensure conditions of existing or constructed structures will not contaminate any cannabis products or anything else for that matter. While the Mendocino Complex Fire has burned the entire property, if any buildings are planned in the future the proper setbacks set forth in the Public Resource Codes 4290 and 4291 will be adhered to.



5.3 Adequate Draining Areas to Prevent Unsanitary Conditions

Stormwater management and water drainage areas were assessed by a team of six that came from both the Water Quality and Water Rights divisions of the SWRCB when they conducted an onsite inspection on November 14, 2018. These individuals were made up of Environmental Scientists, Engineers, Biologists, and Geologists which together created an extremely qualified group of individuals to assist in the creation and maintenance of adequate draining in areas within and surrounding the cultivation areas. The discussions that day and continued communication since have helped the property owners and the applicants to implement different techniques to ensure proper drainage in all areas as to prevent unsanitary conditions in any areas within or adjacent to the cultivation canopies.

5.4 Provision and Maintenance of Waste Treatment Systems to Prevent Contamination

This project location was cleared in November of 2018 by the Lake County Environmental Health Department to not have a requirement of an onsite restroom facility supported by a septic system or any other waste treatment system. There is no requirement set forth in the newest Ordinance 3084 to require such facilities. The project currently approved on this same parcel is currently using an ADA and GAP compliant, portable restroom facility for human refuse as well as an ADA and GAP compliant handwashing station. There is a proposal for an additional standard portable restroom facility on site to accommodate the increase in staff that will be needed for the cultivation of an additional 12-acres. The maintenance and cleaning of these items will follow all health guidelines and the refuse will be dumped in a legal and licensed facility allowed to conduct such activity.

6.0 Security

Security is one of the primary negative issues that arise from commercial cannabis cultivation activities. The large quantities of valuable plants that are present on these cultivation sites potentially attract criminals to these cannabis cultivation operations. This isolated project site possesses a multitude of both naturally occurring and constructed security measures that are either currently in place or planned to be in place by the time this project's cultivation activities commence. The following items will be effective in preventing access to the cultivation area by unauthorized personnel and will deter any unwanted visitors from even getting close to the property. As a result of securing the premises effectively these conditions also provide protection to the physical safety of the approved visitors and employees on site.

6.1 Location and Natural Environment Greatly Inhibits Accessibility by Unauthorized Personnel

The sheer size and remote location of the 333.36-acre parcel where the operations will occur provides a variety of natural deterrents regarding any unwanted visitors on the premises. The topography of the surrounding lands ensures that no portion of the canopy or any of the developed site is able to be viewed from off of the subject parcel.



There are no residences present on any surrounding parcels which minimizes the opportunity for a neighbor or a person visiting a neighbor to even gain knowledge that a commercial cannabis cultivation exists in the area. The seemingly impossible detection of odor from adjacent parcels which is stated in detail under the Air Quality section of this document provides further evidence that a scenario where someone is even able to gain knowledge regarding the activities conducted on the subject parcel is highly unlikely. Through physical reconnaissance, satellite imagery research, and conversations with the surrounding parcel owners that we connected with there are no activities or planning of activities on any of the parcels adjacent to the subject parcel. In addition to above explorations on the matter the "O" and "RL" zoning of these surrounding parcels supports the idea that no major activities will likely occur for the duration of the major use permit that is being applied for.

The overall topography of the area consists of many canyons, mountains, rivers, and rock outcroppings creating a very minimal possibility to access the subject parcel by land through any means other than the easement that begins on

Bartlett Springs Road and ends on the subject property. The length of this easement from Bartlett Springs Road to where it crosses the subject parcel is slightly under two miles. This road surface is dirt with various gullies formed from a lack of attention and improper draining techniques on the road design. Once entering the lot of record there is a fully graveled access road designed and maintained to the standards set forth in the Handbook for Forest, Ranch, and Rural Roads as well as the standards set forth by Cal Fire. The previously developed easements that could have possibly accessed the parcel in the past have all been explored on foot; and they were all found to possess a variety of vegetative overgrowth, downed trees, and ruts and gullies formed by stormwater runoff. These naturally occurring barriers combined with multiple years of neglect, non-use, and lack of any maintenance has caused all these easements to become no longer viable as a means of access to the subject parcel.

Portions of the current road conditions of Bartlett Springs Road, the only way to access the sole easement which accesses the subject property, are below the standards set forth by the Handbook for

Forest, Ranch, and Rural Roads. The poorly maintained state of this closest county road as well as the only access easement creates a limit as to what types of vehicles can navigate through these tough road conditions. While the road is fully accessible for emergency vehicles and or delivery trucks the common automobile would have a minimal opportunity to access the subject parcel.

6.2 Present and Proposed Security Measures

There are multiple signs indicating “private property” and or “no trespassing” strategically posted in conspicuous locations on trees along both sides of the entire roughly two-mile easement from Bartlett Springs Road until the entrance of the subject parcel. These signs provide deterrence for the rare individual who finds themselves in the subject area or on the subject easement. The large amount of these obviously placed signs allows for the on-site staff member to rapidly and accurately determine what an unauthorized person’s intentions could be out in this remote area of Lake County. This determination will prove to be beneficial in speeding up the steps outlined in the Investigation Procedure for Suspicious Activity which will be covered in detail later in this section.

A barn door is strategically placed on the access road entering the parcel. This location is the sole entrance into the cultivation area for any vehicle. This barn door will remain locked with a commercial grade lock and a motion detecting camera covering the area. Details regarding how this location is involved with this project’s security procedures can be found below in the Security Management Procedures subsection. Further details regarding all fences, gates, and locks are found below in the subsection titled Fences, Gates, and Locks Details.

6.3 Video Surveillance Details

Cameras, Recording Device, Storage, and Accessibility of Footage

The security cameras currently onsite and the additional ones to be used are to Meraki MV72 models. The camera locations are outlined in the Site Management Plans. These technologically sophisticated cameras meet all criteria and requirements set forth in Ordinance 3084. These cameras will allow for continuous, live, remote monitoring with the data held in cloud storage. This footage either live or from a specific event is able to be shared with any applicable agencies that require monitoring at any time. Below you will find much of the specifications that are included in these state-of-the-art devices.

Hardware features

- 256 GB high write endurance solid state storage
- 1080p high definition video recording with H.264 encoding
- 3-9 mm varifocal lens
- 802.11ac wireless
- Microphone for audio recording
- IR illumination up to 30 m or 98 ft
- Standard mounting kit included

Wireless Features

- 2.4 GHz 802.11b/g/n radio
- 5 GHz 802.11a/n/ac radio
- Supported frequency bands (country-specific restrictions apply):
 - 2.412 - 2.484 GHz
 - 5.150 - 5.250 GHz (UNII-1)



- 5.250 - 5.350 GHz (UNII-2)
- 5.470 - 5.600, 5.660 - 5.725 GHz (UNII-2e)
- 5.725 - 5.825 GHz (UNII-3)

Physical Characteristics

- Dimensions: 165mm × 103mm (diameter x height)
- Varifocal lens (up to 3× optical zoom)
- Weight without mounting plate: 1247g
- Weight with mounting plate: 1353g
- Female RJ45 Ethernet connector
- Multicolor, multifunction status LED
- Reset button

Other features

- Cloud managed with complete integration into the Meraki dashboard
- Plug and play deployment with self-configuration
- Dynamic day-to-night transition with IR illumination
- Noise optimized motion indexing engine with historical search
- Shared video wall with individual layouts supporting multiple cameras
- Selective export capability with cloud proxy (with watermarked timestamps)
- Highly granular view, review, and export user permissions with SAML integration
- Motion heat maps for relative hourly or day-by-day motion overview
- Motion alerts

Locations of Cameras

The locations of all cameras are displayed in this project's Site Plans. Cameras will be installed in a manner that prevents intentional obstruction, tampering, or disabling of the device. Regular monitoring will further ensure the camera's ability to operate effectively. The entire perimeter and interior of the cannabis canopy will be monitored with video surveillance. The area where cannabis will be loaded on the delivery trucks will be monitored with video surveillance. The area where cannabis vegetative waste is stored and destroyed will be under video surveillance as well. Any future areas where cannabis will be handled in any manner will have cameras installed to monitor the area. A camera will be located at the sole entry point of the subject parcel. This is where all authorized personnel must sign in and out.

6.4 Fence, Gate, and Lock Details

The exterior of the entire canopy space will be fenced in. The location of the fencing can be accessed in the Site Management Plans as well as the section titled Maps and Other Supplemental Information within this document. Posts will be set every 10-feet and a 20-foot wide gate will be set on either side of the access road that traverses through the canopy area. This two-panel drive gate covers a total of 20-foot of width and are 8-foot in height. Each panel is 57" wide with a commercial grade lock locking each side to one another. The product is made with galvanized steel to prevent rust and provide durability. All other gates in connection to this project will be locked with a commercial grade lock. The fencing will be made up of 8-foot tall "Farmgard Deer and Orchard Fencing" (model #348403A). The galvanized metal fencing has a 12.5-gauge wire which when woven creates a 19-gauge diameter. This product has 2-in horizontal and vertical spacing. The hinge-knot woven wire mesh is graduated, with the mesh being tighter at the bottom to deter smaller animals

as well. A top horizontal rail is set across the entire fence line. The standard posts will be 1-3/4" x 3-1/2". The posts are 8-foot in height. The posts are constructed of rail steel providing great durability and resistance to rust (model #901180EB). End, corner, and gate posts are to be set in concrete footing. The gate is a "Yardgard Chain Link Fence Gate" (model # 328404A).

There is an existing 4" wide solid steel gate at the entry of the easement located on CDFW managed land. The property owners received approval from the CDFW Lieutenant, Mike Pasco, to put a commercial grade lock on the gate. All necessary agencies that could potentially traverse this road have been given the information regarding the gate and locking mechanism. A Knox box has been installed as well to abide by all Cal Fire and Lake County requirements. Gate codes and contact information of the property owners have been forwarded to all applicable agencies by CDFW Lieutenant Mike Pasco.



6.5 Security Management Procedures

In this subsection you will find comprehensive security procedures regarding cultivation site, all cannabis materials, any tangible and intangible company assets, personal property of employees, and physical safety of employees.

Procedures for Authorized Personnel, Suppliers, Distributors, and Other Visitors

All persons that enter the lot of record where cannabis cultivation activities occur are identified. All employees and other authorized personnel will notify the onsite manager at least one hour before arriving at the property. This protocol combined with the fact that any other visitors will be arranged by the property owners or the applicants warrants that the presence of any other individual in the vicinity



is a cause for caution. This once again ensures that investigative procedures are implemented immediately. All visitors and employees onsite will be documented. The barn gate on the parcel will be the contact point for all visitors. The authorized personnel will sign in upon arrival and will sign out when departing the site. The license plate number, the name presented on a government issued identification card, arrival and departure time, date and purpose of visit will all be documented and saved.

Maintenance and Monitoring Procedures for all Cameras, Alarms, and Gates

Daily monitoring and maintenance are the responsibility of onsite employees. This daily monitoring is to ensure that no natural or unnatural disturbance has occurred to inhibit the functioning capabilities of the cameras, alarms, or gates. This security and safety monitoring will be conducted along with a multitude of other monitoring activities on a regular basis. With direct remote access to the cameras the applicants will be made immediately aware if any issues occur to the cameras, alarms, or gates.

Investigative Procedures and Actions Taken for Suspicious Activities

The remote rural location of the cultivation site, the large number of conspicuously placed warning signs, the non-existent presence of any adjacent land owner for multiple years, and the procedures put in place for authorized personnel to access the property allows for a quick determination that any non-authorized person in the vicinity of the farm is most likely trespassing. If a suspicious visitor is seen by an employee or any other authorized personnel, they are instructed to immediately contact the onsite manager regarding the issue. The onsite manager will contact an owner and discuss what actions to take. If it is deemed reasonable and safe to engage with the unauthorized visitor, the onsite manager will confront the individual who is trespassing on the subject parcel or potentially trespassing on an adjacent parcel. If the person is on the subject parcel they will be told to leave immediately. If the person is on a neighboring parcel and cannot reasonably show that they have any interest in the adjacent parcel(s) they will be asked to leave the area. If there is any further issue raised in either of these situations law enforcement will be contacted immediately. The CDFW's Game Warden, Ryan Stefenson who is responsible for the area has been in contact with the property owners and is fully aware that a licensed cultivation operation is taking place on the premises. If any authorized personnel notice signs of any recent suspicious activity they are to immediately contact the onsite manager. The onsite manager will contact one of the two property owners. The owners will review any pertinent video footage and make a determination of the next course of action to take. These reasonable actions will be decided on a case to case basis, however, any theft or instance where there is a potential for harm; immediate law enforcement notification will be made. All security related issues will have all procedures and interactions documented with the date, time, and all other pertinent details regarding the specific security issue.

Procedures for Complaints

The owners will continue to make consistent good faith measures to communicate with all adjacent parcel owners. These adjacent property owners will be encouraged to always contact the onsite manager or either of the two owners to address any concerns or address any complaints that could arise from any cultivation related activities on the subject parcel. The name, phone number, and email address of both property owners will be given to all adjacent property owners. Any issue or concern will be addressed immediately. All correspondence will be documented including the resolution. A tally and summary of issues will be provided at the annual Performance Review Report.



Inventory Tracking Procedures for Cannabis Materials

All areas where cannabis will be handled in any manner will have restricted access. The time periods of these restricted access areas will be limited to the amount of reasonable time the individual needs to complete their specific job duty in the area. These time frames will be specifically scheduled to not only ensure safety and security, but to ensure employee efficiency as well. Video surveillance will be present

in every area where any form of cannabis will be handled. Onsite manager will supervise all activities which involve working near or with cannabis in any manner. All onsite interaction with suppliers, distributors, or sub-contracted employees will be documented. Any task with high risk potential, such as loading of product, will always be conducted in areas where video surveillance is present. The handling procedures for cannabis vegetative waste is detailed in the Waste section under the Cannabis Vegetative Waste subsection. All procedures will coincide with the CalCannabis track and trace inventory requirements.

Inventory Tracking Procedures for Non-Cannabis Materials that are Utilized in Relation to the Cultivation Site Activities

All non-cannabis items that have a reasonable value will be documented and recorded. An overall inventory of all tangible non-cannabis items of value will be conducted once a month by the onsite manager. Video surveillance will be present in any area in which high cost items are stored or used. The time periods of these restricted access areas will be limited to the amount of reasonable time the individual needs to complete their specific job duty in the area. These time frames will be specifically scheduled to not only ensure safety and security, but to ensure employee efficiency as well. Intangible cultivation site related items will be protected as well. Computer access will be limited for only the onsite manager to input monitoring data and other pertinent job functions involving a computer. Exclusive and unique passwords will be developed. Firewalls and other anti-virus protection software will be downloaded and updated when needed to ensure unauthorized users are denied access. All cannabis cultivation related documents will also be loaded onto a backup device and or cloud software to further ensure the safety of all business-related documents

Employee Personal Belongings and Personal Safety

The detailed measures that have been developed in the staff screening process will further protect employees from an unsafe work environment.

A comprehensive training program is currently being developed and will be implemented for any cultivation related task that has potential to cause the individual performing the task harm in any way. The program will also teach employees what procedures and actions to take in the event of an earthquake, fire, witnessing of a theft, or witnessing of a trespassing. Gloves, dust masks, boots, long-sleeved shirts, pants, boots, and safety glasses will be used by staff performing any task that should require them.

The employees will have the ability to store their personal items in a lockable structure within their vehicle(s) or another secure location provided by property owners.

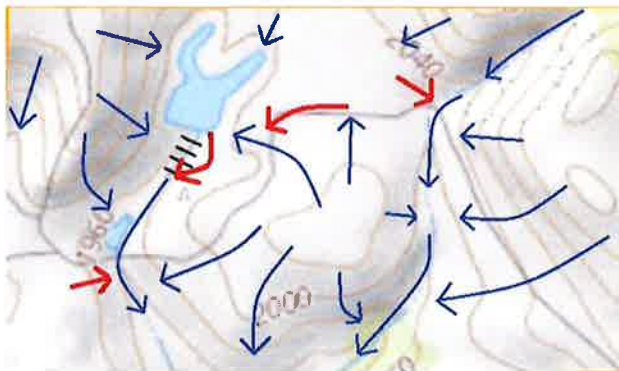
7.0 Stormwater Management

Throughout the Management Plans of this project the protection of surface waters of the State and County is held in the highest regard. Working closely with the Water Quality Division of the State Water Resources Control Board, the applicants have developed Best Practical Treatment and Controls (BPTC) to protect these surface waters from stormwater discharge. These BPTC's also include Best Management Practices (BMP) for all applicable activities that possess potential to degrade the waters of the County and State. The isolated, rural location of this project minimizes the risk to any Lake County maintained drainage or conveyance systems, public roads, or public bridges. There are no such structures within multiple miles of this project. Historically, the subject parcel and adjacent areas have been moderately altered over the years with one exception; two reservoirs built into an unnamed Class II intermittent stream 50 years ago. Ever since the two impoundments of water were created, land alterations on the parcel have been limited to activities involved with basic, small-scale agriculture and livestock grazing. Furthermore, there has been numerous spans of multiple years over the past five decades that have had no disturbances created whatsoever. The absence of any consistent or significant human interaction with the subject parcel over the past fifty years has created a completely natural discharge of stormwater leaving the lot of record. The minimal disturbance that is required on this project creates a straightforward and relatively simple stormwater management plan. This overall plan will provide substantial, logical support that the discharge of stormwater from this site will not degrade surrounding surface waters and will not increase the amount of water that historically has flown onto adjacent properties or any other surrounding areas.

7.1 Management of Stormwater

The first soil that is present on this particular area of the subject parcel is Maxwell clay loam, 2 to 8 percent slopes. These soils are not flooded and not ponded. The natural drainage class of this soil is "somewhat poorly drained". The second soil that is present on this particular area of the subject parcel is Henneke Okiota Complex 30 to 50 percent slopes. Although the slopes are generalized as high in the Lake County Soil Survey, the natural terrain and supporting maps designating the slopes in the area suggests that the slopes in this specific area are under 20%. This soil type is shallow and ranges from excessively drained to well drained. The seasonal zone of water saturation is 57 inches during the four months of highest precipitation, December through March. Once this saturation level is reached or if the accumulation of precipitation is at a higher rate than the infiltration capacity of these soils, storm water is created and must be managed. This project's planned activities of discing, tilling, and cover cropping the soils present across the 12-acre cultivation canopy will improve both the drainage and infiltration capacity of this area resulting in less stormwater runoff. Over the life of the project the soils present in canopy zones will continue to improve in the areas of infiltration and drainage resulting in even less stormwater runoff over the life of this project.

This plan utilizes existing drainage techniques combined with the natural channelization and watercourses that are present on the subject parcel. Below is a graphical representation developed from a topographical map study and a physical reconnaissance of the proposed cannabis cultivation area during high levels of precipitation. The blue arrows represent the dispersion directions of sheet flow from elevated areas. In certain areas, gullies have naturally formed over many years of storm events to channel runoff from higher elevations down into the two intermittent streambeds on the western and eastern sides of the cultivation area. Most of these dispersion areas and gullies are vegetated to provide natural filtration of the storm water runoff. The red arrows on this map represent existing swales that were constructed to effectively manage all storm water runoff in this area which has historically been used for small-scale agriculture. These existing swales guide the flow of the storm water runoff through rocks and vegetation to either disperse over vegetated areas or to ultimately join with the natural channels for storm water runoff. These rocks and vegetation afford a natural filtration for the mobilized sediment in the stormwater sheet flow.



To satisfy the State Water Board's General Waste Discharge Requirements, the entire access road has been improved to the standards set forth in the Handbook for Forest, Ranch, and Rural Roads. Included in these standards are proper surfacing and drainage techniques to appropriately manage stormwater runoff. These drainage techniques include rock fords, side ditches, waterbars, crowning at 4% and outsloping at 4%. The entirety of the access road starting at the entrance of the parcel and ending at the cultivation area meets the standards of the Handbook for Forest, Ranch, and Rural Roads to satisfy this requirement from the State Water Board. An onsite assessment conducted by the Regional Division of Water Quality produced a report that supports this, which is on file at the CDD.

Improvements and maintenance for these swales as well as access road drainage techniques are discussed in detail later in this section.

Stormwater discharge testing methodology and parameters are covered in detail in the Water Resources section of this document.

7.2 Locations and Compliance of Official Flood Zones and County Structures



The most direct line from the southernmost point of the cultivation canopy to the closest public road, Bartlett Springs Road, is over 7,000 feet. The access easement from Bartlett Springs Road to the cultivation area is over 2 miles long, the closest public bridge is even further away. Further details regarding this road and easement can be found in the Security section of this document. Stormwater discharge to any Lake County maintained drainage or conveyance system is virtually impossible as depicted in the image in this subsection. An official low risk flood zone which is graphically represented in green in this illustration is located over 3,800 feet south of the subject parcel. This flood zone is affiliated with Indian Valley Reservoir and the North Fork Cache Creek area. The eastern and western intermittent streams that border the cultivation area join one another about 300 feet south of the subject parcel line. This unnamed stream continues until it joins Kilpepper Creek which is a tributary to Indian Valley Reservoir and North Fork Cache Creek. This unnamed stream which ultimately drains all storm water runoff from the cultivation area of the subject parcel is over 2,000 feet away from this flood zone at its closest point.

7.3 State Water Resources Control Board “General Order” and “Cannabis Policy” Compliance

Tier II-low risk classification

Based on site characteristics and conditions, the cultivation area of this project is characterized as low risk under the State Water Board’s Cannabis Policy. These site conditions include the slope of the cultivation area being 14% on average, well under the 30% maximum allotment for a low risk site. The setback of the canopy or any cultivation related structure to the closest Class II Intermittent Streams on both the east and the west safely exceeds the 100-foot requirement. The expansive vegetative buffers covering the land in which surrounds the cultivation area are rapidly growing back since the Mendocino Complex Fire, and a large-scale planting of native grasses and wildflowers will be conducted as part of the winterization measures for this project.



Preventative and permanent BPTC measures

Sediment capture devices and erosion control methods have been incorporated in the required technical documents submitted to the State Water Board. These shall continually be implemented for the preparation of this project in a scheduled manner that phases in preventative and ultimately permanent measures to address any potential discharge threats to the waters of the State and County. These measures utilize fiber rolls for sediment capture and erosion control on a preventative and permanent basis. Gravel will be added as standard maintenance to ensure proper erosion control

and stormwater management is sustained on the access road. Side ditches and water runoff dispersal areas will be further armored with rip rap to increase effectiveness in managing sediment and to reduce velocity of stormwater. Fiber rolls will be strategically placed in these sided ditches to capture sediment and further dissipate the momentum of the channeled water. Weed free hay (preventative) and native grass and wildflower seed mix (permanent) will be applied to stabilize erosion on disturbed areas on or adjacent to the cultivation area and access road. Water dispersion areas that are currently close to bare will be treated with these same erosion control methods. Any previously disturbed area where seed is unable to grow; decomposed granite will be applied to stabilize the soil. A schedule for the best practical treatments and controls will be provided to the SWRCB within the allotted timeframe under the Department's General Order

Cultivation Related Structures and Canopy



In addition to the previously mentioned safe setbacks of the cultivation canopy there are other methods in the agricultural process that will further protect the waters of the State and County. The generous application of mulch will not only help conserve water resources by assisting the surrounding soils to retain water more efficiently, it will also reduce the opportunity for concentrated flow erosion during periods of high precipitation. The irrigation system for the canopy will be equipped with rain detecting auto shutoff valves as well as an automated system to precisely control the proper agronomic rate of watering.

The proposed structures in relation to the cannabis cultivation includes fertilizer storage, pesticide storage, petroleum storage, and waste storage. The storage areas for the fertilizer, petroleum, and pesticides are pre-assembled sheet metal sheds. These sheds are both located on completely flat, graded areas on a natural land slope of less than 2%. These sheds have a wood floor, a lockable door, and a roof creating a weatherproofed and safe storage facility. All storage amounts of any of the above items will be under a 55-gallon threshold set forth by Lake County Environmental Health.

The waste storage facility consists of segregated areas to address Cannabis Vegetative Waste, recycling, and garbage.

All water storage tanks either existing or proposed are located on firm, level, compacted soil that is free of rocks and roots and capable of bearing the weight of the tank at full capacity.

Monitoring, Maintenance, and Documentation

A monitoring and maintenance schedule will be implemented and reliably documented to ensure the effectiveness of BPTC's being applied. This consistent and thorough level of monitoring is put in place to further safeguard the waters of the State and County from the discharge of sediment. The monitoring and maintenance activities shall take place monthly as well as always after over 1" of precipitation in a 24-hour period. Following storm events an overall monitoring of possible erosion or changes in drainage patterns will be conducted throughout the cultivation area.



- Access road, side ditches, culverts, and roadblocks

- Monthly monitoring will be implemented to review the effectiveness of the road design and drainage techniques. All sections of the entire access road possess either a crowning slope at 4%-5% or an out slope at the same degree where appropriate. The road will be monitored to ensure the draining technique remains at an effective angle for its width of 14'. The condition of the gravel road surface will be documented as well, ensuring both proper gravel coverage and that no rills or gullies are being formed on the surface.
- There are certain portions of the access road where side ditches are present for proper stormwater management and erosion control. These side ditches shall be monitored to ensure they are continually armored with 4"-9" rip rap to protect from storm water sediment transport, erosion of soil in the ditch, and the unwanted deepening of the ditch.
- Culverts shall be routinely checked to make sure they are flowing properly and free of any woody debris or refuse. Conditions will be documented for continual assessment of effectiveness.
- Swales and dispersion areas
 - The effectiveness of the existing swales will be monitored and documented. Rip rap and or vegetation shall be added if any dispersal areas become bare and no longer effective to naturally filter stormwater runoff.
 - The monitoring of the areas where storm water dispersions take place to ensure proper vegetative and rock cover is present to effectively filter sheet flow. Decompaction efforts might be necessary for areas where dense vegetative growth is inhibited. This alternative method will help to improve soil saturation in the area.
- Preventative weed free hay and permanent seeding areas
 - Locations that require hay and eventually native vegetation for erosion control will be monitored for effectiveness. Hay will be applied on an as-needed basis during the interim stage of the project's erosion prevention measures.
 - Once seeded, the saturation in the soil, the growth stage of the grasses and flowers, as well as the level of mulch being applied, will be monitored and documented.
- Fiber Rolls
 - All straw wattle will be monitored for the effectiveness of their size and location as a sediment capture device. The sediment captured in these fiber rolls will either be stabilized in place or removed and stabilized on site at a safe set-back from a water course. The amount of sediment captured at each location will be documented.
- Irrigation system
 - Monitoring and maintenance of the irrigation system lines, connections, tanks, and pumps will be documented to ensure there are no leaks or old, worn components not operating efficiently and effectively.
- Fertilizers, pesticides, and other soil amendments

- Inventory will be conducted on a monthly basis to ensure accuracy of daily use and ordering.
- All products receptacles will be checked for integrity and maintained visibility and legibility of labels.

7.4 Adherence to Best Management Practices for Current Applicable Activities

Currently no grading or major construction of any kind is necessary to complete this project. If grading or any other activities are needed, all appropriate agencies and departments will be contacted, and all applicable BMPs will be applied. A 2-day (48-hours) forecast of precipitation at any time during minor construction, activities involving BPTC methods, or access road maintenance activities will prompt a cessation of work until conditions have improved and work can recommence. This project's current scope of work could potentially require adherence to the following BMPs:



**California Stormwater
Quality Association**

Erosion Control

EC-1	Scheduling	Definite Use
EC-2	Preservation of Existing Vegetation	Definite Use
EC-3	Hydraulic Mulch	Possible Use
EC-4	Hydroseeding	Possible Use
EC-6	Straw Mulch	Definite Use
EC-8	Wood Mulching	Definite Use
EC-9	Earth Dikes and Drainage Swales	Definite Use
EC-10	Velocity Dissipation Devices	Possible Use
EC-12	Streambank Stabilization	Possible Use
EC-14	Compost Blanket	Possible Use
EC-15	Soil Preparation/Roughening	Definite Use
EC-16	Non-Vegetative Stabilization (Decomposed Granite)	Possible Use
WE-1	Wind Erosion Control	Possible Use

Sediment Control

SE-5	Fiber Rolls	Definite Use
SE-9	Straw Bale Barrier	Definite Use
SE-13	Compost Socks and Berms	Possible Use
SE-14	Biofilter Bags	Possible Use

Waste Management

WM-1	Material Delivery and Storage	Definite Use
WM-2	Material Use	Definite Use
WM-3	Stockpile Management	Definite Use
WM-4	Spill Prevention and Control	Definite Use
WM-5	Solid Waste Management	Definite Use
WM-6	Hazardous Waste Management	Possible Use
WM-8	Concrete Waste Management	Definite Use

Non-Stormwater Management

NS-1	Water Conservation Practices	Definite Use
NS-6	Illicit Connection/Illegal Discharge Detection and Reporting	Definite Use
NS-7	Potable Water/Irrigation	Definite Use
NS-8	Vehicle Equipment Cleaning	Definite Use
NS-9	Vehicle and Equipment Fueling	Definite Use
NS-10	Vehicle and Equipment Maintenance	Definite Use

Treatment Control

TC-30	Vegetated Swale	Definite Use
TC-31	Vegetated Buffer Strip	Definite Use

Site Design

SD-10	Site Design and Landscaping Planning	Definite Use
SD-12	Efficient Irrigation	Definite Use
SD-32	Trash Storage Areas	Definite Use
SD-34	Outdoor Material Storage	Definite Use
SD-35	Outdoor Work Areas	Definite Use

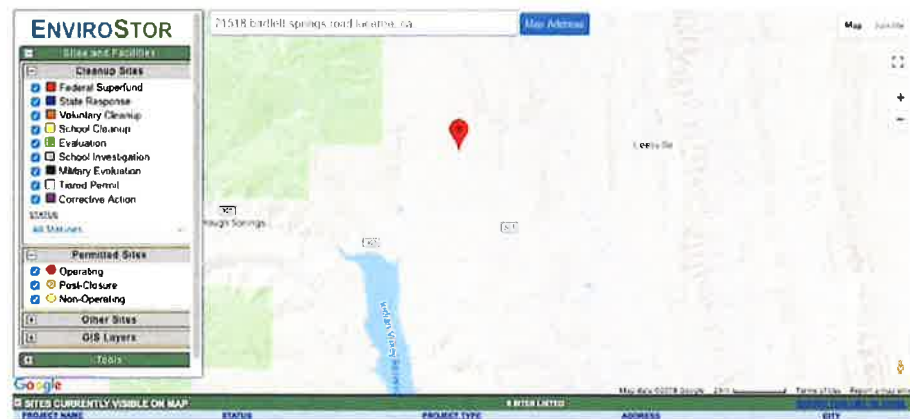
8.0 Waste Management

Throughout the entirety of this Waste Management section there is a consistent effort to secure, document, minimize, and eliminate whenever possible all waste encountered throughout the duration of this project. The proper handling, storage, and disposal of waste will be implemented and strictly enforced to protect the environment from any unnatural contaminants of any kind. The four types of waste management plans that will be covered in this section are hazardous waste, cannabis vegetative waste, growing medium management, and a waste volume control and reduction plan. The final plan in this section incorporates creative and environmentally friendly approaches to the handling of all types of waste to control and reduce its volume whenever possible. One of the main goals of this project is to create a completely closed loop system where every type of waste involved in any manner on the subject parcel (other than unusable hazardous waste) is either reused or recycled.

8.1 Hazardous Waste Management

The applicants conducted a Hazardous Waste search on the surrounding area of the subject parcel. There are no such facilities, cleanups, or investigations anywhere remotely close to the subject parcel.

This project has no intention of ever using or storing hazardous wastes. If any hazardous waste is found on the parcel during conservation



activities the Lake County Division of Environmental Health will be notified, and protocols will be followed with their guidance regarding the specific hazardous waste that is found.

Any pesticides, herbicides, rodenticides, petroleum products, and fertilizers shall be stored in a safe manner segregated from the outside environment. All storage and application of fertilizer and other soil amendments will always strictly comply with label directions, "Label Is Law". All fertilizers and other soil amendments will always be CDFA registered as 100% Organic Input Material (OIM). Details of storage containers can be found in their respective sections. No liquid product will be purchased in over a 50-gallon container and no solid product shall be purchased in a bag more than 25-pounds of weight.

All grounds where concentrated fertilizers or soil amendments will be handled will have minimal opportunity to seep into the native soil in the area. The storage structure has nearly impervious plywood floors. The standard ordering practices allow for only minimal sized receptacles of any fertilizers or soil amendments to be purchased. These limits are 50-gallons for liquids and 25-pounds for solids. This limit on receptacle size ensures only minimal spills could potentially occur on the cultivation site. There will be saw dust and wood chips present in both the storage facility and the mixing location for fertilizers. The Office of Emergency Services contact number, 1 (800) 852-7550, will be conspicuously posted in both the storage and mixing areas for fertilizers in case of an extreme emergency where an accidental discharge occurs in the waters of the state. All storage units will have clear signage on the front of them to easily identify what each storage unit holds.

8.2 Cannabis Vegetative Material Waste Management

The processes handling cannabis vegetative material waste are broken down into five phases; generation and initial handling, transportation, measuring and documenting, storage and reporting, and lastly disposal. All procedures are designed to satisfy county and state regulations regarding cannabis vegetative material waste.

Generation and Initial Handling

The two sources of cannabis vegetative material waste are the routine trimming of leaves and small branches and the removal of unhealthy plants. During routine trimming practices the cannabis vegetative material waste will be immediately placed into an impervious, portable, covered container. In the event that a removal of an unhealthy plant is necessary; the soil will be ripped from the root ball and will remain inside the perimeter of the cannabis cultivation canopy.

Transportation

For cannabis vegetative material waste generated from both routine trimming practices and plant extraction the material will be transported to the waste storage facility immediately after the intended activity is complete. Once at the waste storage facility; the path and original areas will be double checked to ensure no cannabis vegetative material waste was dropped or left behind.

Measuring and Documenting

There will be a specific measuring receptacle used to prevent cross contamination with other types of wastes. The measurement device is state approved. The scale being used is a Crane Scale with LCD display and an accurate, high precision sensor. The weight, date, source, and batch number will be recorded, affixed to the container, and made readily available for easy access for potential inspections. All cannabis vegetative material waste will be accounted for at every stage of this process.



Storage and Reporting

The storage location for all cannabis vegetative material waste is completely segregated from the outside environment, held in an impervious and separate storage container. The container will be locked and only the on-site manager and both owners will be given access to the key/code of the commercial grade lock. Security cameras will be setup in all areas that cannabis vegetative material waste is handled and stored. Once properly documented and securely stored the authorized user of the track and trace system will enter the information into the program within 24-hours of the weighing of the cannabis vegetative material waste. All material in this receptacle will be held for 72-hours and made readily available for potential inspection.



Disposal

All cannabis vegetative material waste will be ultimately composted. Larger sized stalks, root balls, and branches will be put through the wood chipper to further break down the material. These wood chipped items along with any leaves, small branches, and small roots will be added to the compost pile. The compost pile will always have over 50% non-cannabis compostable matter present. Figures for all compostable materials will be documented. This compost will ultimately be reused in the domestic or cannabis garden on the subject parcel.

8.3 Growing Medium Management

All growing medium will be treated within the cultivation canopy itself. With a living soil approach to the cultivation practices; cover cropping, companion plantings, and organic inputs will be used to continually improve the quality of the native soils. There are no current plans to import any outside soil. These amendments will be decided upon once final soil analysis results come in. All details regarding these soil amendments will be updated as required by the SWRCB



General Order. In the rare instance where growing medium must be removed from canopy location, a designated storage location within the waste storage facility will be utilized. This removed growth medium will be treated with various amendments and composts to revive the soil to a healthy state to be reused for future agricultural purposes. The amount of removed growing medium will be measured and documented. These areas within the waste storage facility will be covered by a tarp if any level of precipitation is forecasted or if the cultivation site is going into winterization mode after annual harvest. This location is a safe distance from any plants, shrubs, or watercourses.

8.4 Waste Volume Control and Reduction Plan

The waste volume control and reduction plan is comprised of five key elements; education of staff, monitoring of all volumes of waste, waste reduction, waste reuse, and waste recycle.

Education of Staff

All on-site staff will be required to go through a waste management training course administered by the onsite manager. The waste management section of this document along with much of the referenced materials will be required reading for all staff. A thorough site tour will be administered to all staff. All the clearly marked locations for each type of waste will be identified. Proper measuring techniques, spill prevention, and actions taken in the event of a spill will all be covered. A basic quiz to test the comprehension of the material covered will be administered by manager, and staff review will be required periodically. Anytime a new material arrives on-site, staff will be educated about what it is and how to handle, use, and store the material.

Monitoring of all Volumes of Waste

The strict adherence to the proposed monitoring program will allow for classification of all solid waste into specific source, type, and amount. This information will help analyze the effectiveness of the program and ultimately improve the process of how solid waste is managed. After enough data is compiled SMART goals will be developed and staff will be incentivized to reach them.

Waste Reduction

This project possesses many standard operating procedures implemented in an effort to reduce waste whenever possible. Below is a list of waste reducing practices with some being implemented immediately and some which will be implemented through the life of the project:

- Characteristics of packaging of products that are purchased
 - Stream-lined, low total volume packaging
 - Receptacle is reusable

- Characteristics of materials purchased
 - High performance, durable materials
 - Use only materials with no hazardous components present in their production
- Digital and other paperless formats for all project related documents
 - Saves paper for record keeping, invoices, payroll, and other business communications and activities
- Treatment of soil onsite
 - Reduces need for transportation of growing medium, reducing emissions, potential erosion, and dust created by eliminating vehicle traffic
 - Minimizes waste of growing medium by naturally amending existing soils after each harvest
- Integrated pesticide management techniques
 - Lowers need for packaging and receptacle waste
 - Minimizes potentially hazardous chemicals onsite

Waste Reuse

The salvation of all materials whenever possible for reuse on site is at the core of this practice. Some examples of agricultural materials that will be reused are pots, spent growth medium, netting, and seeds. During common maintenance, agricultural, or minor land disturbance activities materials surface that have potential for beneficial reuse. Native soil will be reused for the creation of berms or leveling of another surface. Uncovered rocks will be used for armoring drainage outlets and gullies as well as erosion control and other minor site development and maintenance techniques. Smaller branches and root balls will be ripped, put in the wood chipper, and used as mulch on site. Leaves, non-woody plants, and small roots and branches will be composted and used onsite. A standard is set to compost all biodegradable materials. Reusing all organic compounds for the betterment of the natural environment creates a healthy interaction with the land. These composts will be used to aid in cannabis garden health as well as in revegetation efforts set forth in the Stormwater Management and Fish and Wildlife sections of this document. Any potential materials uncovered during conservation activities on the subject parcel will be utilized to their maximum potential.



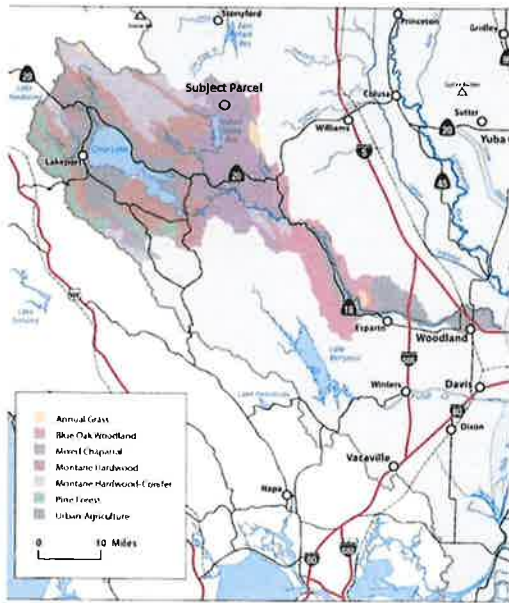
Waste Recycle

The purchasing of recyclable materials in recyclable packaging will be a major factor in the ordering process of this project. All items that are deemed unsalvageable will be properly recycled at one of the permitted landfills in the area.

9.0 Water Use and Resources

It is in the best interest of this project and the overall cannabis cultivation operation to protect the waters of the State of California and the County of Lake. One of the many ways to preserve the natural state of these ground waters, surface flows, and the overall Cache Creek watershed is to minimize the use of water whenever feasibly possible. Responsible use of water by all businesses and individuals within a watershed can have a positive effect on the quality and quantity of water within that area. The altruistic intention of this project to minimize water use whenever reasonably possible is demonstrated through the utilization of efficient and agronomic irrigation, operational related standards and procedures, and various other cultivation related practices. Any future opportunity to assist in the betterment of these resources will be eagerly encouraged and accepted by the applicant.

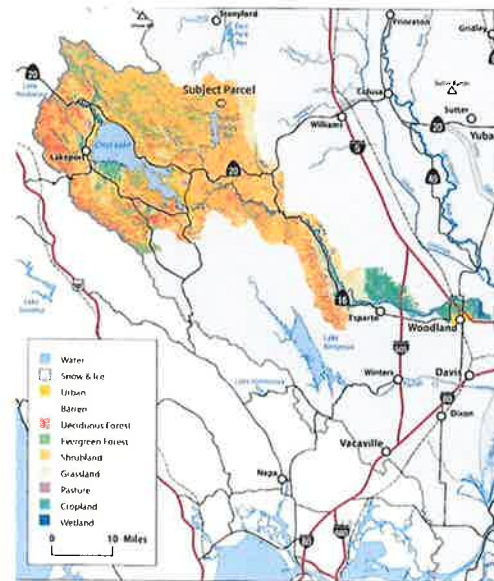
9.1 Cache Creek Watershed



The water resources on the lot of record are part of the Cache Creek watershed within the Westside sub region within the Sacramento River Basin region. The unique watershed number is 73, the Calwater code for this watershed is 5513, and the USGS Hydrologic Unit Code is 18020116. This drainage basin spans approximately 1,300 square miles and is home to a population of 57,690 people. The Cache Creek Watershed covers three counties; Colusa, Yolo, and Lake. Precipitation levels vary within the watershed from up to 60" in the northernmost Upper Cache Creek region to as low as 17" in the southern area of the watershed near the Cache Creek basin. Our specific area has an average of 34" per year. All water resources located on the lot of record are unnamed tributaries into Kilpepper Creek. Kilpepper Creek flows into Indian Valley Reservoir and exits through North Fork Cache Creek which serves along with Bear Creek as the two main tributaries to Cache Creek. Cache Creek

originates at Clear Lake in Lake County and serves as the sole outlet of the largest freshwater lake in California. The common delivery point for all contributed runoff and watercourses in this watershed is the Cache Creek Settling Basin. This point of terminus is about 30 miles east of Lake Berryessa in Yolo County.

In Lake County a large portion of the Cache Creek watershed is managed by Bureau of Land Management (BLM) and is designated as a Wilderness Area. This large Wilderness Area that covers much of the northern section of the Cache Creek watershed (which surrounds the lot of record) has preserved much of the natural riparian vegetation and habitats. The eradication of nonnative species in riparian habitats by the BLM has also tremendously assisted in the strong health of this specific area within the watershed. Other than the preservation that the Wilderness Area provides, the Cache Creek watershed land uses include agriculture, gravel mining, hunting, and livestock.



On the subject parcel there are two intermittent streams that begin north of the parcel on the westernmost side. There is a natural spring and a perennial stream on the eastern side of the parcel. The spring originates on the parcel and the perennial stream begins east of the parcel, just under 500 feet west of the Colusa County line. All surface water on the parcel flows through a natural channelization of various vegetative swales joining these streams and ultimately crossing the southern parcel line into Killpepper Creek.