High Valley Ranch
Property Management Plan

Project Location

11650 High Valley Road

Clearlake Oaks, CA

Project Parcel

Lake County APN

006-004-070

Project Property

Lake County APNs

006-004-070, 006-004-250, 006-004-240, 006-002-040,

006-002-090, 006-004-060, & 006-009-360

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Figures

Appendices

HIGH VALLEY RANCH -
CANNABIS CULTIVATION FACILITY

11650 HIGH VALLEY ROAD
CLEARLAKE OAKS, CA 95423

PROJECT TEAM

CIVIL ENGINEER
FAREED PITTALWALA, PE
KIMLEY-HORN AND ASSOCIATES, INC.
555 CAPITOL MALL, SUITE 300
SACRAMENTO, CA 95814
(916) 858-5800
FAREED.PITTALWALA@KIMLEY-HORN.COM

OWNER
AVIONA, LLC.
11315 TREYBURN WAY
SAN DIEGO, CA 92131

APPLICANT
SOUTZHVR, INC.
11315 TREYBURN WAY
SAN DIEGO, CA 92131

LEGEND

- PROPERTY LINE
- PROJECT BOUNDARY
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- OUTDOOR CULTIVATION CANOPY AREA, 80 ACRES.
- PROPOSED NURSERY AREA, 5.0 ACRES
- "BUILDING #1" – PROPOSED COLD STORAGE BUILDING
- APPROXIMATE SIZE AND LOCATION OF EXISTING VEGETATION COMPOST AREA
- EXISTING WELL LOCATION WITH 100' SETBACK
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION

ABBREVIATIONS

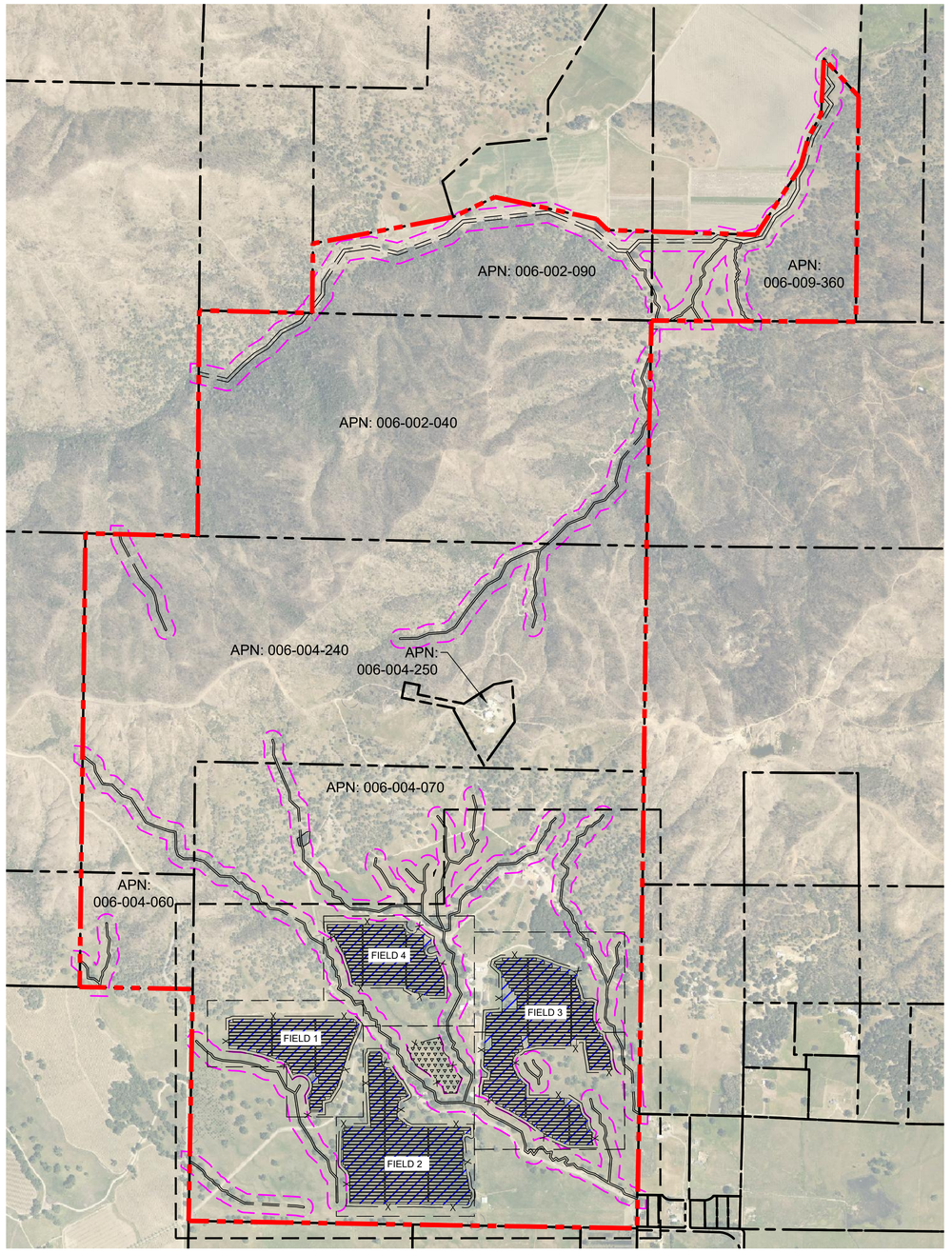
APN – ASSESSOR PARCEL NUMBER
AC – ACRE
P/L – PROPERTY LINE
R/W – RIGHT-OF-WAY

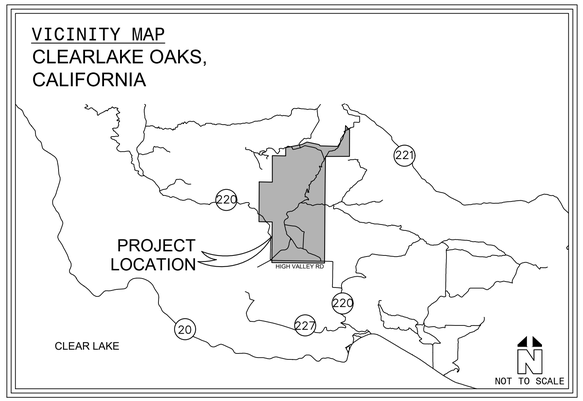
SITE INFORMATION

SITE ADDRESS:	11650 HIGH VALLEY ROAD CLEARLAKE OAKS, CA 95423
APN(S):	006-002-060, 006-004-250, 006-004-240, 006-002-040, 006-002-090, 006-009-360, 006-004-070
PROPOSED PARKING SPACES:	65
TOTAL SITE AREA:	1,643.53 ACRES
PROPOSED PLANTING BED AREA:	80 ACRES (3,484,800 SF)
PROPOSED NURSERY:	5.0 ACRES (217,800 SF)
PROPOSED FENCED CULTIVATION AREA:	140 ACRES (6,098,400 SF)
LICENSE TYPES:	80 – A – TYPE 3 OUTDOOR CULTIVATION LICENSES 1 – TYPE 11 DISTRIBUTOR 1 – A – TYPE 4 NURSERY

	CANOPY AREA (AC)	TOTAL FENCED AREA (AC)
FIELD 1	14.0	23.80
FIELD 2	25.5	41.40
FIELD 3	27.5	48.20
FIELD 4	13.0	21.60
NURSERY		5.00
TOTAL	80	140.00

PARKING TABLE:	REQUIRED	PROVIDED
STANDARD	60	60
ACCESSIBLE	3	5
TOTAL:	63	65





VICINITY MAP
SCALE: NTS

SHEET INDEX

NORTH
GRAPHIC SCALE IN FEET
0 400 800 1600

Know what's below. Call before you dig.

No.	REVISIONS	DATE
2	2ND COUNTY SUBMITTAL	4/29/2021
1	1ST COUNTY SUBMITTAL	2/4/2021

APPLICANT:
SOURZHVR, INC.
11315 TREYBURN WAY
SAN DIEGO, CA 92131

PREPARED BY:
Kimley»Horn

555 CAPITOL MALL, SUITE 300
SACRAMENTO, CA 95814
PHONE: 916-858-5800
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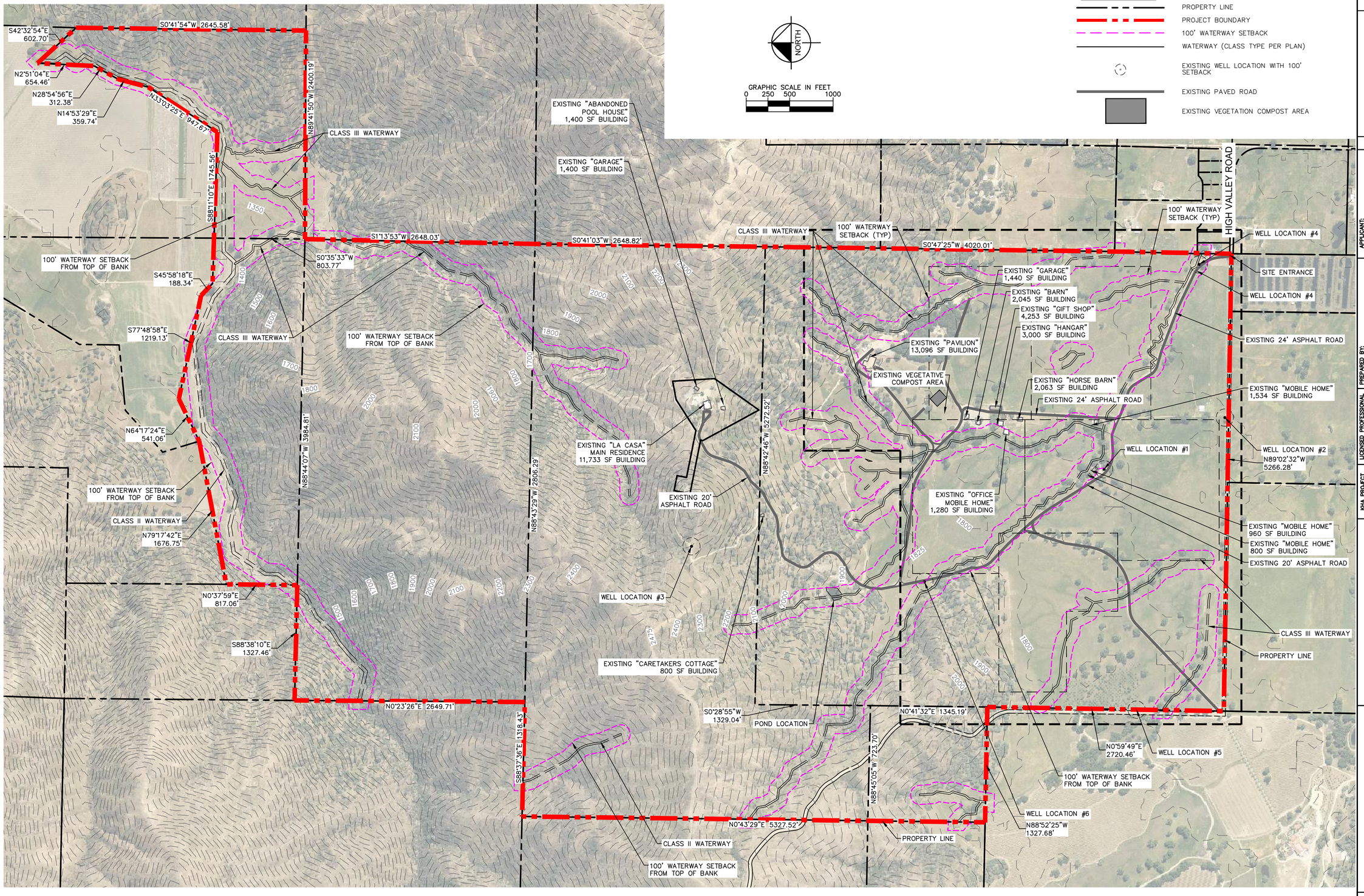
LICENSED PROFESSIONAL ENGINEER
FAREED S. PITTALWALA
No. 22862
REGISTERED PROFESSIONAL ENGINEER
STATE OF CALIFORNIA
CIVIL
NOT FOR CONSTRUCTION

KHA PROJECT	197400001
DATE	4/30/2021
SCALE	AS SHOWN
DESIGNED	GM
DRAWN	NS
CHECKED	FP

COVER SHEET

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C1.0



No.	REVISIONS	DATE
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FARES S. PITALWALA
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CIVIL
STATE OF CALIFORNIA
NOT FOR CONSTRUCTION

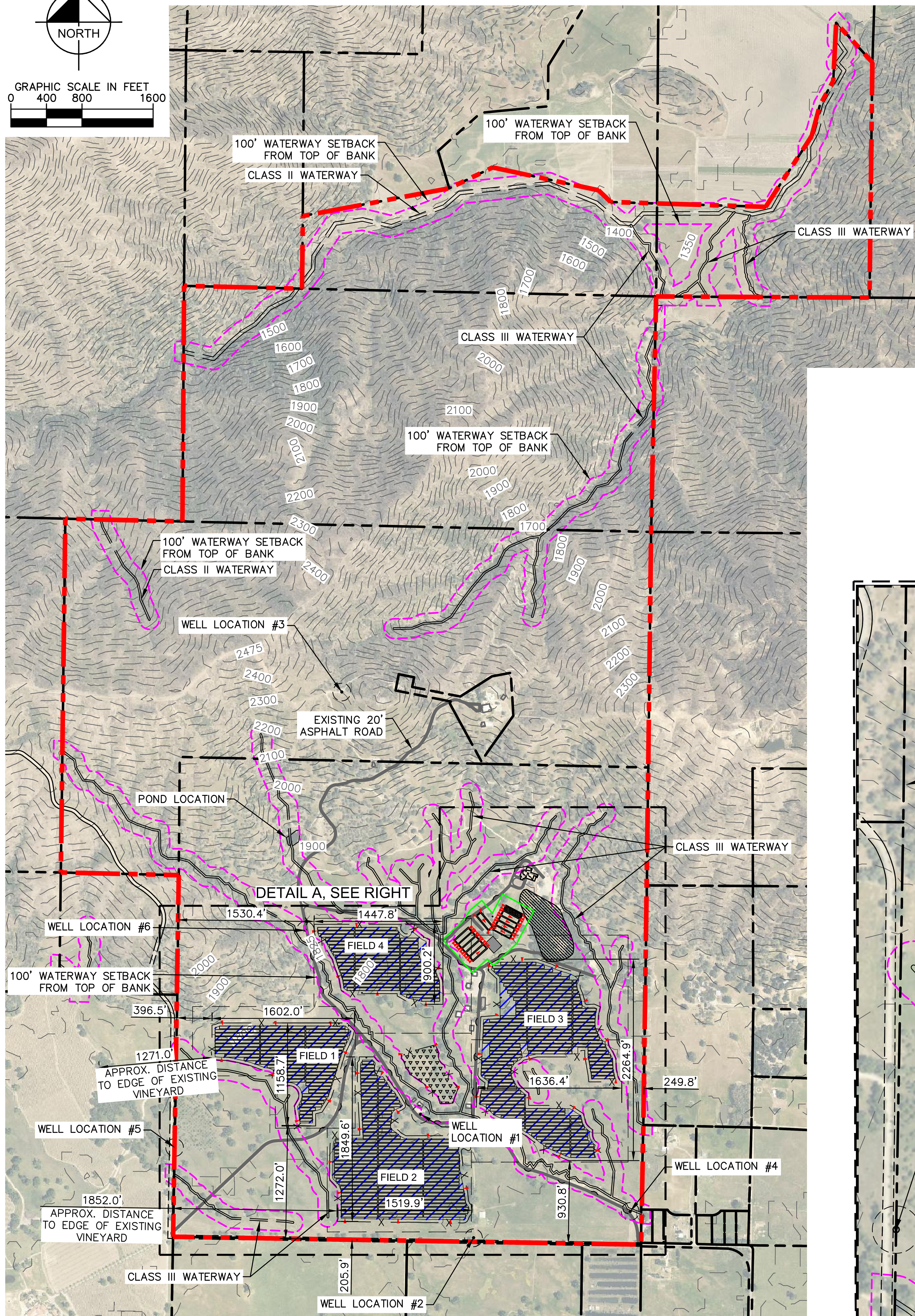
KHA PROJECT	197400001
DATE	4/29/2021
SCALE AS SHOWN	
DESIGNED	GM
DRAWN	NS
CHECKED	FP

EXISTING CONDITION

HIGH VALLEY RANCH

LAKE COUNTY, CA

SHEET NUMBER
C2.0



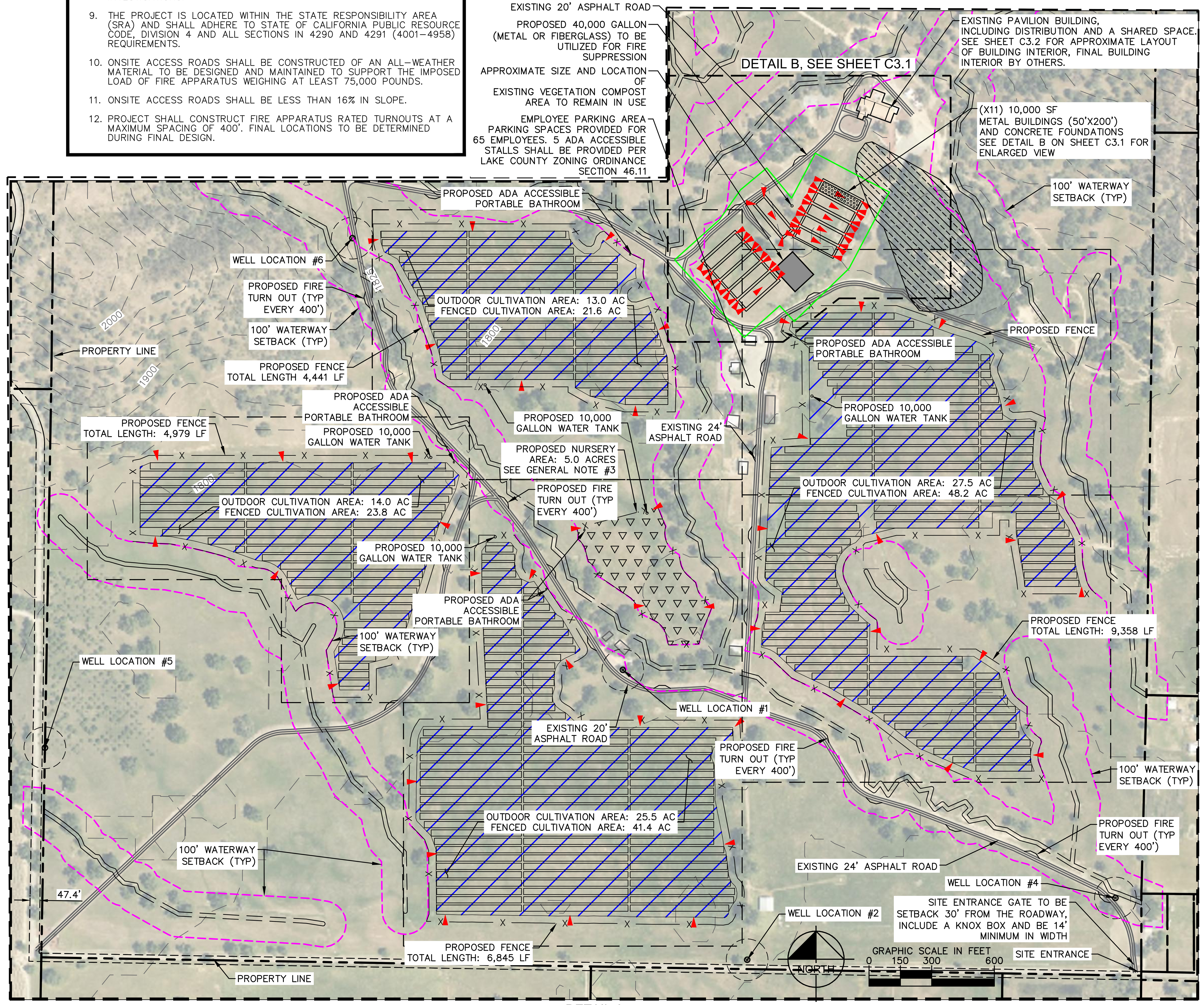
NORTH
GRAPHIC SCALE IN FEET
0 400 800 1600
100' WATERWAY SETBACK FROM TOP OF BANK
CLASS II WATERWAY
CLASS III WATERWAY
WELL LOCATION #3
EXISTING 20' ASPHALT ROAD
POND LOCATION
DETAIL A, SEE RIGHT
WELL LOCATION #6
FIELD 1
FIELD 2
FIELD 3
FIELD 4
APPROX. DISTANCE TO EDGE OF EXISTING VINEYARD
WELL LOCATION #5
WELL LOCATION #1
WELL LOCATION #4
WELL LOCATION #2
1530.4'
1447.8'
900.2'
396.5'
1602.0'
1271.0'
1158.7'
1849.6'
1636.4'
2264.9'
249.8'
1272.0'
1519.9'
930.8'
1852.0'
205.9'

GENERAL NOTES

1. NO GRADING PROPOSED FOR THE PROPOSED PROJECT AREA.
2. THE PROPOSED PROJECT WILL NOT REQUIRE THE REMOVAL OF ANY TREES OR ENCROACH INTO ANY WATERS OF THE UNITED STATES.
   2.1. AVOID IMPACTING OR REMOVING PROTECTED TREES AND TRUE OAK SPECIES. IF ANY PROTECTED OR TRUE OAK TREE ARE PROPOSED FOR REMOVAL, THE PROJECT PROPONENT SHOULD PROCURE A TREE SURVEY AND ARBORIST REPORT. LAKE COUNTY REQUIRES MITIGATION FOR THE REMOVAL OF PROTECTED TREES; TYPICAL MITIGATION IS TREE REPLACEMENT AT A RATIO OF 2:1 OR 3:1.
3. NO FERTILIZER OR PESTICIDE USE SHALL BE LOCATED WITHIN 100' OF ANY SPRING, TOP OF BANK OF ANY CREEK OR SEASONAL STREAM, EDGE OF LAKE, DELINEATED WETLAND OR VERNAL POOL.
4. OUTDOOR CULTIVATION AREA: 80 ACRES
5. FENCED CULTIVATION AREA: 140 ACRES
6. FINAL PLACEMENT AND ADDITIONAL INFORMATION PERTAINING TO THE PROPOSED METAL BUILDINGS WILL BE PROVIDED.
7. THIS IS AN ORGANIC CULTIVATION ON APN: 006-004-070 WITH NO CULTIVATION PROPOSED ON THE REMAINING PARCELS; THE REMAINING PARCELS PROVIDE LAND TO MEET A REQUIREMENT FOR 20 ACRES OF NON-CULTIVATION FOR EVERY 1 ACRE OF PROPOSED CULTIVATION.
8. PROJECT OWNER TO INSTALL NEW WATER WELL AND OBTAIN NECESSARY PERMITS PRIOR TO CONSTRUCTION OF WELL. PROPOSED WELL TO BE CONSTRUCTED WITHIN 50' OF THE PROPOSED NURSERY AND SHALL NOT BE INSTALLED WITHIN 100' OF ANY WATERCOURSE. EXACT LOCATION TO BE DETERMINED BASED ON FURTHER SITE INVESTIGATIONS.
9. THE PROJECT IS LOCATED WITHIN THE STATE RESPONSIBILITY AREA (SRA) AND SHALL ADHERE TO STATE OF CALIFORNIA PUBLIC RESOURCE CODE, DIVISION 4 AND ALL SECTIONS IN 4290 AND 4291 (4001-4958) REQUIREMENTS.
10. ONSITE ACCESS ROADS SHALL BE CONSTRUCTED OF AN ALL-WEATHER MATERIAL TO BE DESIGNED AND MAINTAINED TO SUPPORT THE IMPOSED LOAD OF FIRE APPARATUS WEIGHING AT LEAST 75,000 POUNDS.
11. ONSITE ACCESS ROADS SHALL BE LESS THAN 16% IN SLOPE.
12. PROJECT SHALL CONSTRUCT FIRE APPARATUS RATED TURNOUTS AT A MAXIMUM SPACING OF 400'. FINAL LOCATIONS TO BE DETERMINED DURING FINAL DESIGN.

LEGEND

- PROPERTY LINE
- PROJECT BOUNDARY
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- 100' DEFENSIBLE SPACE BUFFER
- OUTDOOR CULTIVATION CANOPY AREA, 80 ACRES.
- PROPOSED NURSERY AREA, 5.0 ACRES
- "BUILDING #1" – PROPOSED COLD STORAGE BUILDING
- PROTECTION ZONE – NO GROUND OR TREE DISTURBANCE
- EXISTING VEGETATION COMPOST AREA. SIZE AND LOCATION APPROXIMATE.
- EXISTING WELL LOCATION WITH 100' SETBACK
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION



EXISTING 20' ASPHALT ROAD
PROPOSED 40,000 GALLON (METAL OR FIBERGLASS) TO BE UTILIZED FOR FIRE SUPPRESSION
APPROXIMATE SIZE AND LOCATION OF EXISTING VEGETATION COMPOST AREA TO REMAIN IN USE
EMPLOYEE PARKING AREA PARKING SPACES PROVIDED FOR 65 EMPLOYEES. 5 ADA ACCESSIBLE STALLS SHALL BE PROVIDED PER LAKE COUNTY ZONING ORDINANCE SECTION 46.11
DETAIL B, SEE SHEET C3.1
EXISTING PAVILION BUILDING, INCLUDING DISTRIBUTION AND A SHARED SPACE. SEE SHEET C3.2 FOR APPROXIMATE LAYOUT OF BUILDING INTERIOR, FINAL BUILDING INTERIOR BY OTHERS.
(X11) 10,000 SF METAL BUILDINGS (50'X200') AND CONCRETE FOUNDATIONS SEE DETAIL B ON SHEET C3.1 FOR ENLARGED VIEW
100' WATERWAY SETBACK (TYP)
PROPOSED ADA ACCESSIBLE PORTABLE BATHROOM
WELL LOCATION #6
PROPOSED FIRE TURN OUT (TYP EVERY 400')
100' WATERWAY SETBACK (TYP)
PROPOSED FENCE TOTAL LENGTH 4,441 LF
OUTDOOR CULTIVATION AREA: 13.0 AC FENCED CULTIVATION AREA: 21.6 AC
PROPERTY LINE
PROPOSED FENCE
PROPOSED ADA ACCESSIBLE PORTABLE BATHROOM
PROPOSED 10,000 GALLON WATER TANK
PROPOSED FENCE TOTAL LENGTH: 4,979 LF
PROPOSED ADA ACCESSIBLE PORTABLE BATHROOM
PROPOSED 10,000 GALLON WATER TANK
PROPOSED 10,000 GALLON WATER TANK
EXISTING 24' ASPHALT ROAD
PROPOSED NURSERY AREA: 5.0 ACRES SEE GENERAL NOTE #3
PROPOSED FIRE TURN OUT (TYP EVERY 400')
OUTDOOR CULTIVATION AREA: 14.0 AC FENCED CULTIVATION AREA: 23.8 AC
OUTDOOR CULTIVATION AREA: 27.5 AC FENCED CULTIVATION AREA: 48.2 AC
PROPOSED 10,000 GALLON WATER TANK
PROPOSED ADA ACCESSIBLE PORTABLE BATHROOM
100' WATERWAY SETBACK (TYP)
PROPOSED FENCE TOTAL LENGTH: 9,358 LF
WELL LOCATION #5
WELL LOCATION #1
EXISTING 20' ASPHALT ROAD
PROPOSED FIRE TURN OUT (TYP EVERY 400')
100' WATERWAY SETBACK (TYP)
OUTDOOR CULTIVATION AREA: 25.5 AC FENCED CULTIVATION AREA: 41.4 AC
100' WATERWAY SETBACK (TYP)
PROPOSED FIRE TURN OUT (TYP EVERY 400')
EXISTING 24' ASPHALT ROAD
WELL LOCATION #4
SITE ENTRANCE GATE TO BE SETBACK 30' FROM THE ROADWAY, INCLUDE A KNOX BOX AND BE 14' MINIMUM IN WIDTH
WELL LOCATION #2
47.4'
PROPOSED FENCE TOTAL LENGTH: 6,845 LF
PROPERTY LINE
NORTH
GRAPHIC SCALE IN FEET
0 150 300 600
SITE ENTRANCE

DETAIL A

FERTILIZER NOTES

1. NO FERTILIZER OR PESTICIDE SHALL BE LOCATED WITHIN 100' OF ANY SPRING, TOP OF BANK OF ANY CREEK OR SEASONAL STREAM, EDGE OF LAKE, DELINEATED WETLAND OR VERNAL POOL.
2. THE FOLLOWING ORGANIC, OMRI CERTIFIED FERTILIZERS SHALL BE USED ON THE PROJECT:
   - SYL-COAT
   - REGALIA CG
   - VENERATE CG
   - GRANDEVO CG
   - BIO-TAM
   - XENTARI DF
   - AZAGUARD
   - DIPEL DF
   - PURESPRAY GREEN
   - TRIGGER

No.	REVISIONS	DATE
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LICENSED PROFESSIONAL: NOT FOR CONSTRUCTION

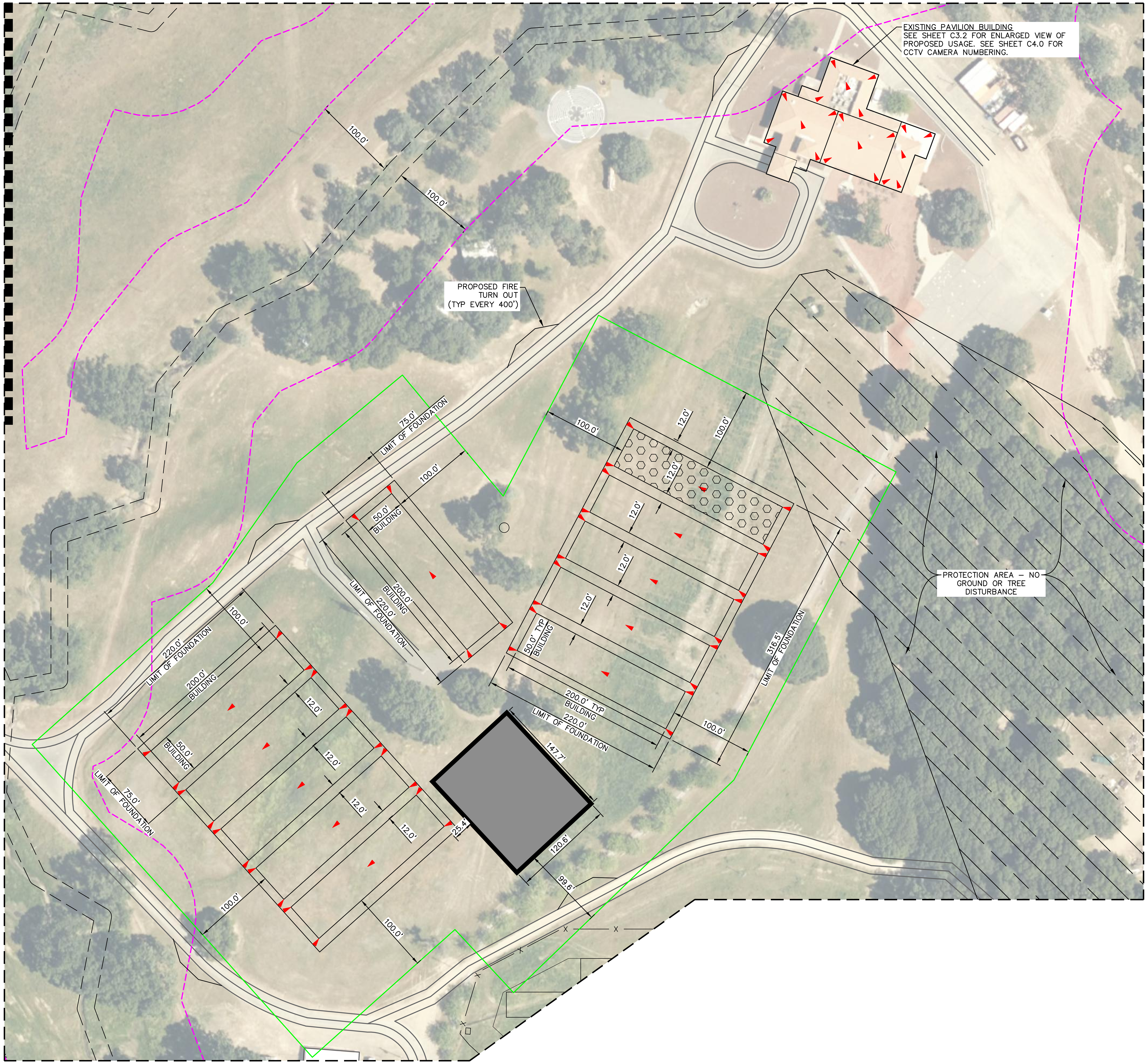
KHA PROJECT 197400001
DATE 4/30/2021
SCALE AS SHOWN
DESIGNED GM
DRAWN NS
CHECKED FP

PROPOSED SITE PLAN

HIGH VALLEY RANCH

LAKE COUNTY, CA

SHEET NUMBER C3.0



DETAIL B

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11. ONSITE ACCESS ROADS SHALL BE LESS THAN 16% IN SLOPE.
12. PROJECT SHALL CONSTRUCT FIRE APPARATUS RATED TURNOUTS AT A MAXIMUM SPACING OF 400'. FINAL LOCATIONS TO BE DETERMINED DURING FINAL DESIGN.

LEGEND

- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- 100' DEFENSIBLE SPACE BUFFER
- APPROXIMATE SIZE AND LOCATION OF EXISTING VEGETATION COMPOST AREA
- BUILDING #1 – PROPOSED COLD STORAGE BUILDING
- PROTECTION AREA – NO GROUND OR TREE DISTURBANCE
- EXISTING WELL LOCATION WITH 100' SETBACK
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION

NORTH

GRAPHIC SCALE IN FEET
0 30 60 120

No.	REVISIONS	DATE
2	2ND COUNTY SUBMITTAL	4/29/2021
1	1ST COUNTY SUBMITTAL	2/4/2021

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11315 TREYBURN WAY
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PREPARED BY:
Kimley»Horn
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SACRAMENTO, CA 95814
PHONE: 916-858-5800
WWW.KIMLEY-HORN.COM

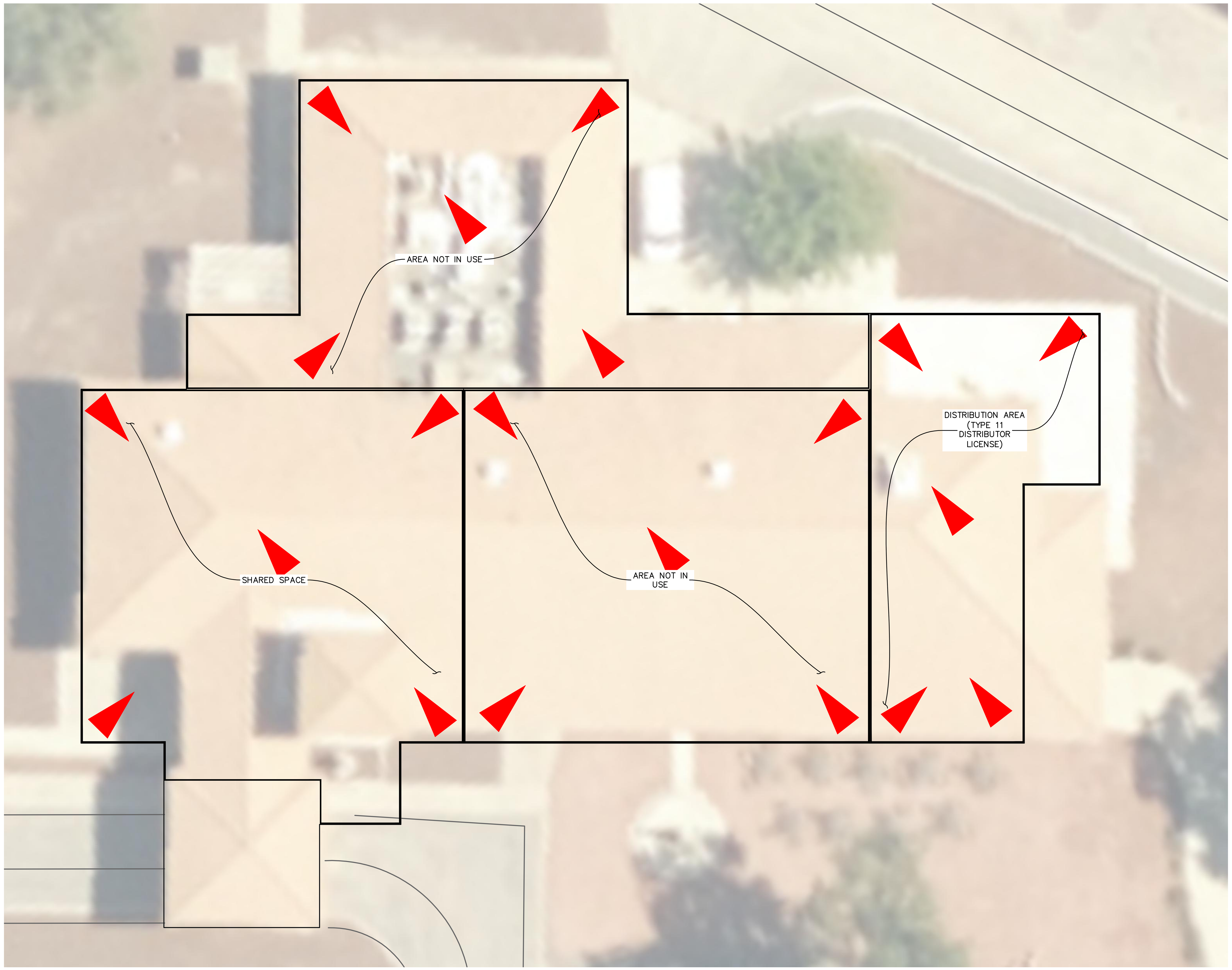
LICENSED PROFESSIONAL
PROFESSIONAL ENGINEER · PITTALWALA · No. 88862 · CIVIL · STATE OF CALIFORNIA · REGISTERED
NOT FOR CONSTRUCTION

KHA PROJECT 197400001
DATE 4/30/2021
SCALE AS SHOWN
DESIGNED GM
DRAWN NS
CHECKED FP

DETAIL B
ENLARGED SITE PLAN

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C3.1



EXISTING PAVILION PROPOSED USAGE

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LEGEND

APPROXIMATE LIMITS OF SPECIFIC LICENSE USAGE WITHIN PAVILION BUILDING. SEE PLAN VIEW FOR LICENSE TYPE.

PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION

NORTH

GRAPHIC SCALE IN FEET
0 5 10 20

No.	REVISIONS	DATE
1	1ST COUNTY SUBMITTAL	2/4/2021
2	2ND COUNTY SUBMITTAL	4/29/2021

APPLICANT:
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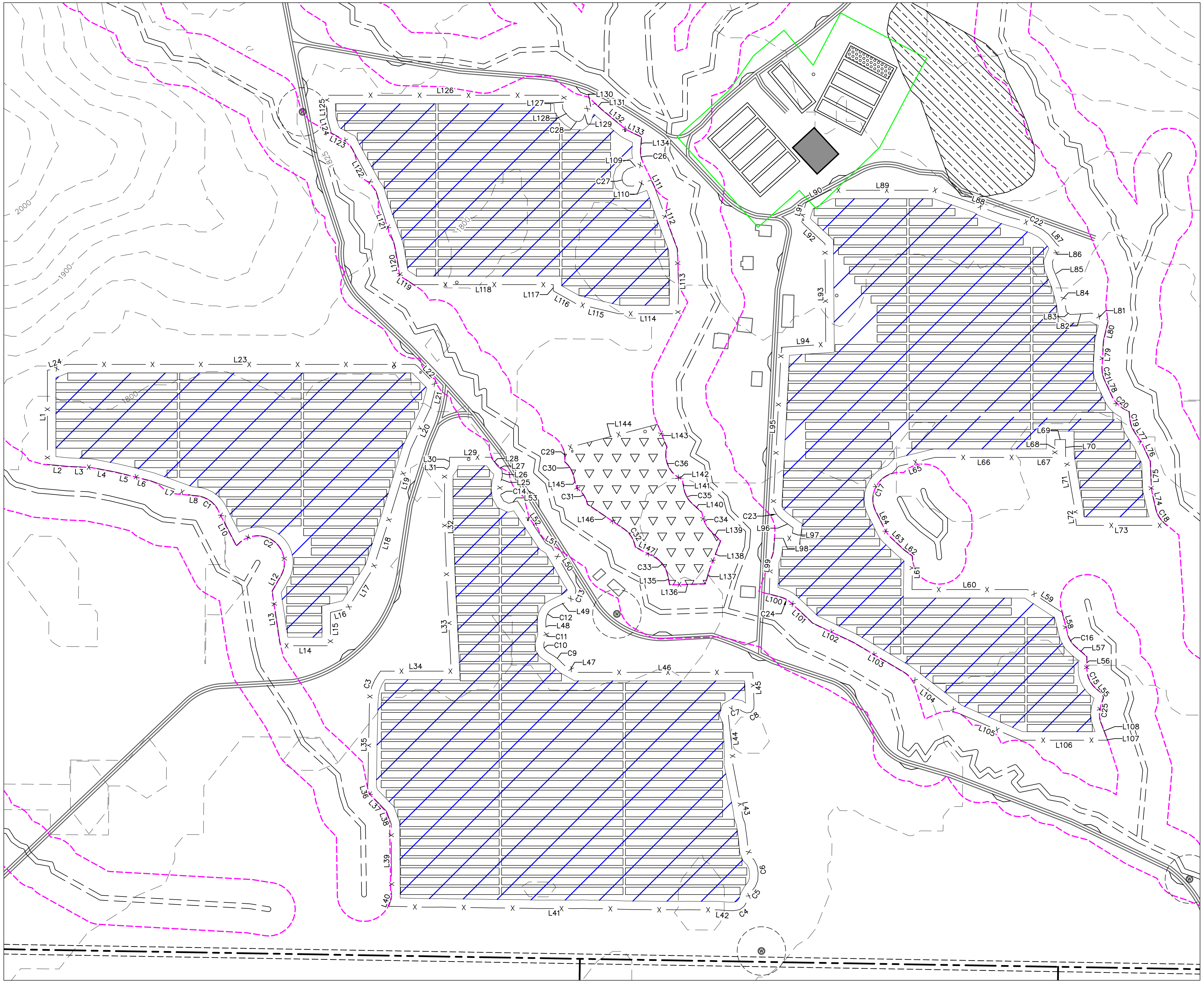
SCALE AS SHOWN
DESIGNED GM
DRAWN NS
CHECKED FP

ENLARGED PAVILION BUILDING

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C3.2



GENERAL NOTES

1. SEE SHEET C3.4 FOR LINE AND CURVE TABLES

LEGEND

- PROPERTY LINE
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- 100' DEFENSIBLE SPACE BUFFER
- OUTDOOR CULTIVATION AREA, 80 ACRES.
- "BUILDING #1" – PROPOSED COLD STORAGE BUILDING
- PROPOSED NURSERY AREA, 5.0 ACRES
- APPROXIMATE SIZE AND LOCATION OF EXISTING VEGETATION COMPOST AREA
- EXISTING WELL LOCATION WITH 100' SETBACK

NORTH

GRAPHIC SCALE IN FEET
0 100 200 400

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DRAWN NS
CHECKED FP

FENCE DIMENSION PLAN

HIGH VALLEY RANCH

LAKE COUNTY, CA

SHEET NUMBER
C3.3

LINE TABLE		
LINE	LENGTH	BEARING
L1	387.79	S0°00'00.00"E
L2	88.10	S84°45'35.13"E
L3	87.43	S87°42'33.79"E
L4	108.71	S79°27'25.12"E
L5	78.08	S76°35'42.32"E
L6	74.24	S75°15'22.90"E
L7	171.10	S70°13'16.79"E
L8	27.98	S84°17'21.78"E
L10	164.87	S27°04'18.96"E
L12	91.32	S28°57'37.21"W
L13	227.15	S8°31'50.54"E
L14	205.83	N90°00'00.00"E
L15	136.95	N0°00'00.00"E
L16	74.56	N76°09'35.38"E
L17	194.79	N32°19'47.34"E
L18	230.25	N17°51'26.19"E
L19	285.20	N17°05'31.81"E
L20	186.46	N25°43'44.03"E
L21	95.56	N14°34'16.00"E
L22	123.96	N45°21'45.26"W
L23	1437.36	S89°59'59.99"W
L24	80.16	S72°30'37.77"W

CURVE TABLE		
CURVE	RADIUS	LENGTH
C1	111.38'	107.65'
C2	111.62'	312.81'

FIELD 1 - LINE & CURVE TABLES

LINE TABLE		
LINE	LENGTH	BEARING
L25	25.92	N16°23'30.45"E
L26	27.39	N2°54'46.17"W
L27	23.15	N50°37'43.99"W
L28	45.02	N34°42'09.74"W
L29	172.65	N90°00'00.00"W
L30	35.32	S0°00'00.00"E
L31	34.66	S35°56'26.04"W
L32	447.33	S1°10'04.71"E
L33	370.73	S2°48'19.72"E
L34	291.05	N90°00'00.00"W
L35	351.77	S1°11'34.51"W
L36	29.39	S18°11'44.37"E
L37	98.57	S43°56'15.75"E
L38	55.77	S20°09'06.88"E
L39	304.10	S0°19'47.57"E
L40	36.86	S19°07'59.08"W
L41	1361.31	S89°22'49.57"E
L42	30.72	S84°45'45.27"E
L43	390.87	N10°43'59.01"W
L44	199.64	N5°01'48.77"W
L45	128.26	N2°26'13.50"W
L46	724.71	N90°00'00.00"W
L47	56.53	N60°38'21.00"W
L48	30.82	N2°59'13.82"W
L49	76.62	N61°52'57.01"E

LINE TABLE		
LINE	LENGTH	BEARING
L50	193.80	N30°05'56.30"W
L51	29.26	N59°19'08.34"W
L52	208.42	N33°52'44.60"W
L53	37.00	S75°00'11.97"W

CURVE TABLE		
CURVE	RADIUS	LENGTH
C3	188.62'	137.73'
C4	70.76'	123.44'
C5	190.51'	48.69'
C6	108.12'	136.14'
C7	30.83'	78.77'
C8	29.74'	80.88'
C9	228.16'	85.96'
C10	36.71'	55.73'
C11	82.71'	45.77'
C12	63.48'	75.54'
C13	37.64'	57.12'
C14	69.49'	100.79'

FIELD 2 - LINE & CURVE TABLES

LINE TABLE		
LINE	LENGTH	BEARING
L55	43.74	N38°26'37.40"W
L56	53.00	N0°00'00.03"E
L57	64.20	N48°48'50.05"W
L58	92.30	N14°02'10.15"W
L59	171.17	N56°42'07.30"W
L60	475.04	S89°59'59.97"W
L61	138.39	N0°04'02.26"E
L62	39.73	N53°22'51.86"W
L63	113.41	N44°02'42.93"W
L64	91.30	N26°33'53.66"W
L65	188.28	N69°35'49.97"E
L66	403.93	N90°00'00.00"E
L67	90.35	N90°00'00.00"E
L68	73.40	N0°00'00.00"E
L69	43.81	N90°00'00.00"E
L70	64.47	S0°00'00.00"E
L71	218.21	S9°40'20.42"E
L72	74.35	S6°14'59.30"E
L73	371.02	N90°00'00.00"E
L74	81.46	N12°52'26.07"W
L75	120.52	N2°35'35.01"W
L76	79.95	N25°20'45.72"W
L77	64.84	N32°28'15.70"W
L78	80.96	N24°46'30.00"W
L79	115.05	N3°16'48.38"E

LINE TABLE		
LINE	LENGTH	BEARING
L80	84.53	N13°06'56.87"E
L81	74.76	N66°19'58.57"W
L82	87.93	S86°31'11.54"W
L83	18.67	N56°55'34.67"W
L84	113.60	N13°21'22.56"W
L85	100.66	N18°13'53.37"W
L86	70.55	N22°43'54.21"E
L87	64.45	N41°23'37.50"W
L88	363.16	N70°35'05.03"W
L89	434.45	N89°59'59.99"W
L90	110.78	S62°28'23.94"W
L91	76.81	S16°42'45.30"W
L92	138.31	S46°21'16.72"E
L93	414.15	S0°27'16.37"E
L94	183.48	S86°04'08.26"W
L95	655.22	S2°55'13.02"W
L96	53.85	S54°12'19.27"E
L97	43.46	S7°44'03.62"W
L98	70.13	N90°00'00.00"W
L99	230.38	S5°34'45.63"W
L100	51.69	S75°15'22.90"E
L101	122.70	S46°32'52.74"E
L102	180.12	S64°47'55.48"E
L103	248.07	S59°31'58.57"E
L104	273.71	S52°41'20.31"E

LINE TABLE		
LINE	LENGTH	BEARING
L105	285.30	S66°31'54.72"E
L106	356.95	N90°00'00.00"E
L107	3.37	N17°52'42.91"W
L108	74.32	N21°02'12.25"W

CURVE TABLE		
CURVE	RADIUS	LENGTH
C15	123.50'	93.92'
C16	117.12'	59.67'
C17	111.05'	191.29'
C18	124.71'	78.98'
C19	173.32'	80.69'
C20	115.73'	94.16'
C21	100.66'	45.77'
C22	330.79'	139.32'
C23	87.93'	70.89'
C24	115.08'	47.19'
C25	128.62'	105.78'

FIELD 3 - LINE & CURVE TABLES

LINE TABLE		
LINE	LENGTH	BEARING
L109	69.58	S71°40'16.33"W
L110	80.37	N72°15'10.59"E
L111	33.83	S25°20'45.72"E
L112	268.87	S20°08'50.71"E
L113	267.28	S0°37'46.40"E
L114	243.62	S89°59'59.86"W
L115	181.65	N76°35'52.49"W
L116	106.88	N60°36'08.02"W
L117	25.46	N0°00'01.49"W
L118	574.61	N90°00'00.00"W
L119	67.56	N56°00'16.43"W
L120	110.69	N9°59'23.39"W
L121	251.93	N18°32'02.94"W
L122	229.03	N29°13'50.78"W
L123	82.53	N61°16'27.33"W
L124	59.77	N15°55'54.33"W
L125	97.63	N2°15'49.68"W
L126	979.28	N90°00'00.00"E
L127	57.04	S5°25'05.35"W
L128	47.30	S39°20'39.98"E
L129	41.03	N19°52'03.46"E
L130	43.53	N54°59'27.68"E
L131	34.76	S47°06'57.20"E
L132	136.01	S50°53'45.04"E
L133	67.03	S64°07'11.41"E

LINE TABLE		
LINE	LENGTH	BEARING
L134	52.15	S4°45'26.22"W

CURVE TABLE		
CURVE	RADIUS	LENGTH
C26	113.52'	59.47'
C27	36.92'	109.71'
C28	30.89'	63.60'

FIELD 4 - LINE & CURVE TABLES

LINE TABLE		
LINE	LENGTH	BEARING
L135	45.86	S12°15'52.89"E
L136	145.82	N88°10'54.02"E
L137	70.98	N16°36'36.11"E
L138	115.91	N21°21'10.10"E
L139	63.90	N44°59'59.37"W
L140	56.77	N47°29'21.77"W
L141	40.69	N10°37'10.50"W
L142	23.07	N57°31'43.15"W
L143	100.74	N22°27'08.32"W
L144	400.03	S75°20'06.64"W

CURVE TABLE		
CURVE	RADIUS	LENGTH
C29	116.83'	53.22'
C30	108.86'	65.49'
C31	105.78'	82.91'
C32	113.71'	90.55'
C33	111.79'	92.93'
C34	141.74'	80.65'
C35	112.93'	63.32'
C36	110.01'	140.93'

NURSERY - LINE & CURVE TABLES

No.	REVISIONS	DATE
2	2ND COUNTY SUBMITTAL	4/29/2021
1	1ST COUNTY SUBMITTAL	2/4/2021

APPLICANT:
SOURZHVR, INC.
11315 TREBURN WAY
SAN DIEGO, CA 92131

PREPARED BY:
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LICENSED PROFESSIONAL ENGINEER
REGISTERED PROFESSIONAL ENGINEER
FARREL S. PITTALWALA
No. C087862
CIVIL
STATE OF CALIFORNIA
NOT FOR CONSTRUCTION

KHA PROJECT 197400001
DATE 4/30/2021
SCALE AS SHOWN
DESIGNED GM
DRAWN NS
CHECKED FP

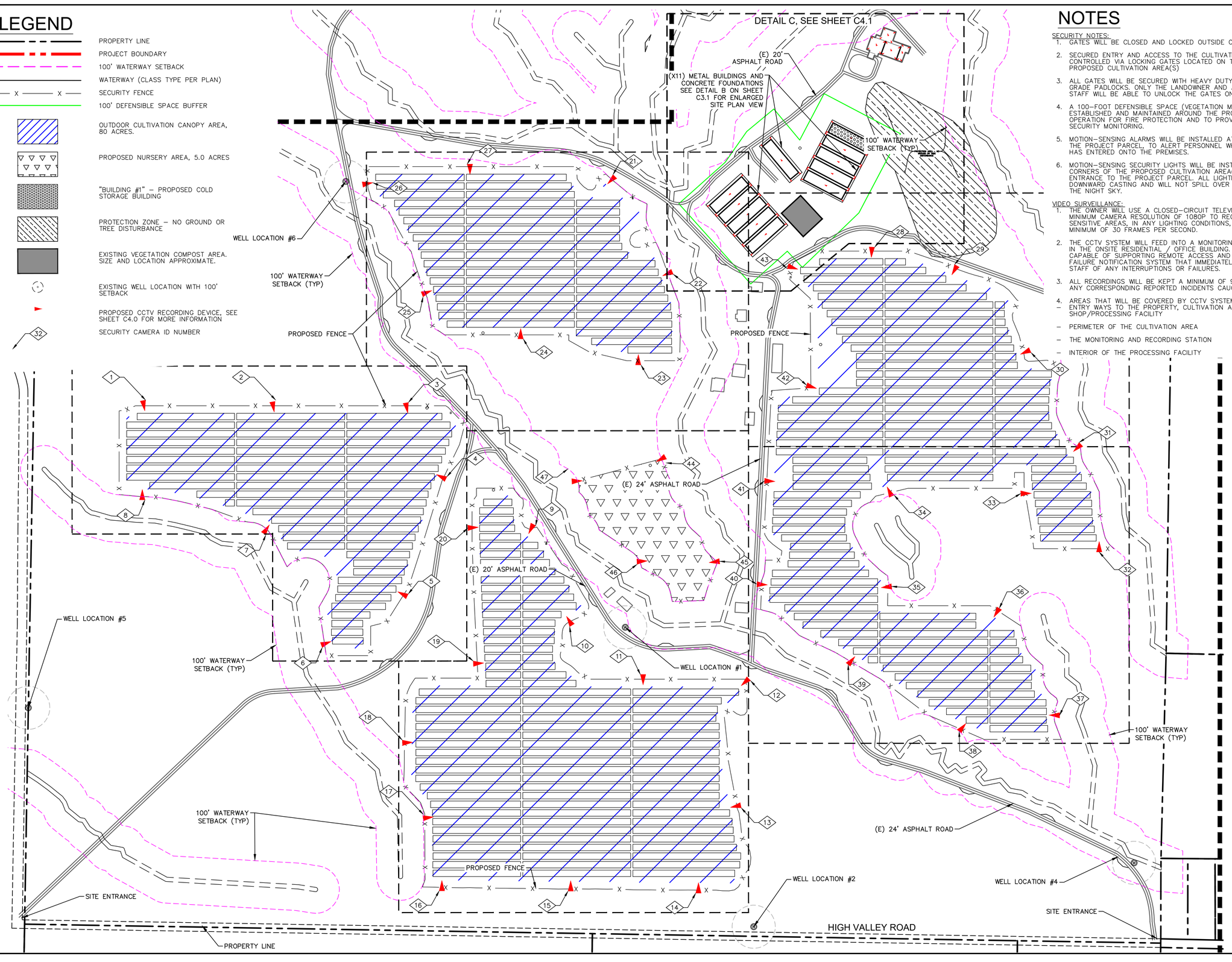
LINE AND CURVE TABLES

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C3.4

LEGEND

- PROPERTY LINE
- PROJECT BOUNDARY
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- 100' DEFENSIBLE SPACE BUFFER
- OUTDOOR CULTIVATION CANOPY AREA, 80 ACRES.
- PROPOSED NURSERY AREA, 5.0 ACRES
- "BUILDING #1" – PROPOSED COLD STORAGE BUILDING
- PROTECTION ZONE – NO GROUND OR TREE DISTURBANCE
- EXISTING VEGETATION COMPOST AREA. SIZE AND LOCATION APPROXIMATE.
- EXISTING WELL LOCATION WITH 100' SETBACK
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION
- SECURITY CAMERA ID NUMBER



NOTES

SECURITY NOTES:

1. GATES WILL BE CLOSED AND LOCKED OUTSIDE OF OPERATING HOURS
2. SECURED ENTRY AND ACCESS TO THE CULTIVATION AREA(S) WILL BE CONTROLLED VIA LOCKING GATES LOCATED ON THE WEST SIDE OF THE PROPOSED CULTIVATION AREA(S)
3. ALL GATES WILL BE SECURED WITH HEAVY DUTY CHAINS AND COMMERCIAL GRADE PADLOCKS. ONLY THE LANDOWNER AND APPROVED MANAGERIAL STAFF WILL BE ABLE TO UNLOCK THE GATES ON THE PROJECT PROPERTY.
4. A 100-FOOT DEFENSIBLE SPACE (VEGETATION MANAGEMENT) SHALL BE ESTABLISHED AND MAINTAINED AROUND THE PROPOSED CULTIVATION OPERATION FOR FIRE PROTECTION AND TO PROVIDE FOR VISIBILITY AND SECURITY MONITORING.
5. MOTION-SENSING ALARMS WILL BE INSTALLED AT THE MAIN ENTRANCE TO THE PROJECT PARCEL, TO ALERT PERSONNEL WHEN SOMEONE/SOMETHING HAS ENTERED ONTO THE PREMISES.
6. MOTION-SENSING SECURITY LIGHTS WILL BE INSTALLED ON ALL EXTERNAL CORNERS OF THE PROPOSED CULTIVATION AREA(S), AND AT AT THE MAIN ENTRANCE TO THE PROJECT PARCEL. ALL LIGHTING WILL BE FULLY SHIELDED, DOWNWARD CASTING AND WILL NOT SPILL OVER ONTO OTHER PROPERTIES OR THE NIGHT SKY.

VIDEO SURVEILLANCE:

1. THE OWNER WILL USE A CLOSED-CIRCUIT TELEVISION (CCTV) SYSTEM WITH A MINIMUM CAMERA RESOLUTION OF 1080P TO RECORD ACTIVITY AT ALL SENSITIVE AREAS, IN ANY LIGHTING CONDITIONS, 24 HOURS A DAY AND AT A MINIMUM OF 30 FRAMES PER SECOND.
2. THE CCTV SYSTEM WILL FEED INTO A MONITORING AND RECORDING STATION IN THE ONSITE RESIDENTIAL / OFFICE BUILDING. THE CCTV SYSTEM WILL BE CAPABLE OF SUPPORTING REMOTE ACCESS AND WILL BE EQUIPPED WITH A FAILURE NOTIFICATION SYSTEM THAT IMMEDIATELY NOTIFIES MANAGERIAL STAFF OF ANY INTERRUPTIONS OR FAILURES.
3. ALL RECORDINGS WILL BE KEPT A MINIMUM OF 90 DAYS, AND 7 YEARS FOR ANY CORRESPONDING REPORTED INCIDENTS CAUGHT ON TAPE.
4. AREAS THAT WILL BE COVERED BY CCTV SYSTEM INCLUDE:
   - ENTRY WAYS TO THE PROPERTY, CULTIVATION AREA(S), AND SHOP/PROCESSING FACILITY
   - PERIMETER OF THE CULTIVATION AREA
   - THE MONITORING AND RECORDING STATION
   - INTERIOR OF THE PROCESSING FACILITY

No.	REVISIONS	DATE
2	2ND COUNTY SUBMITTAL	4/29/2021
1	1ST COUNTY SUBMITTAL	2/4/2021

APPLICANT:
SOURZHVR, INC.
11315 TREBURN WAY
SAN DIEGO, CA 92131

PREPARED BY:
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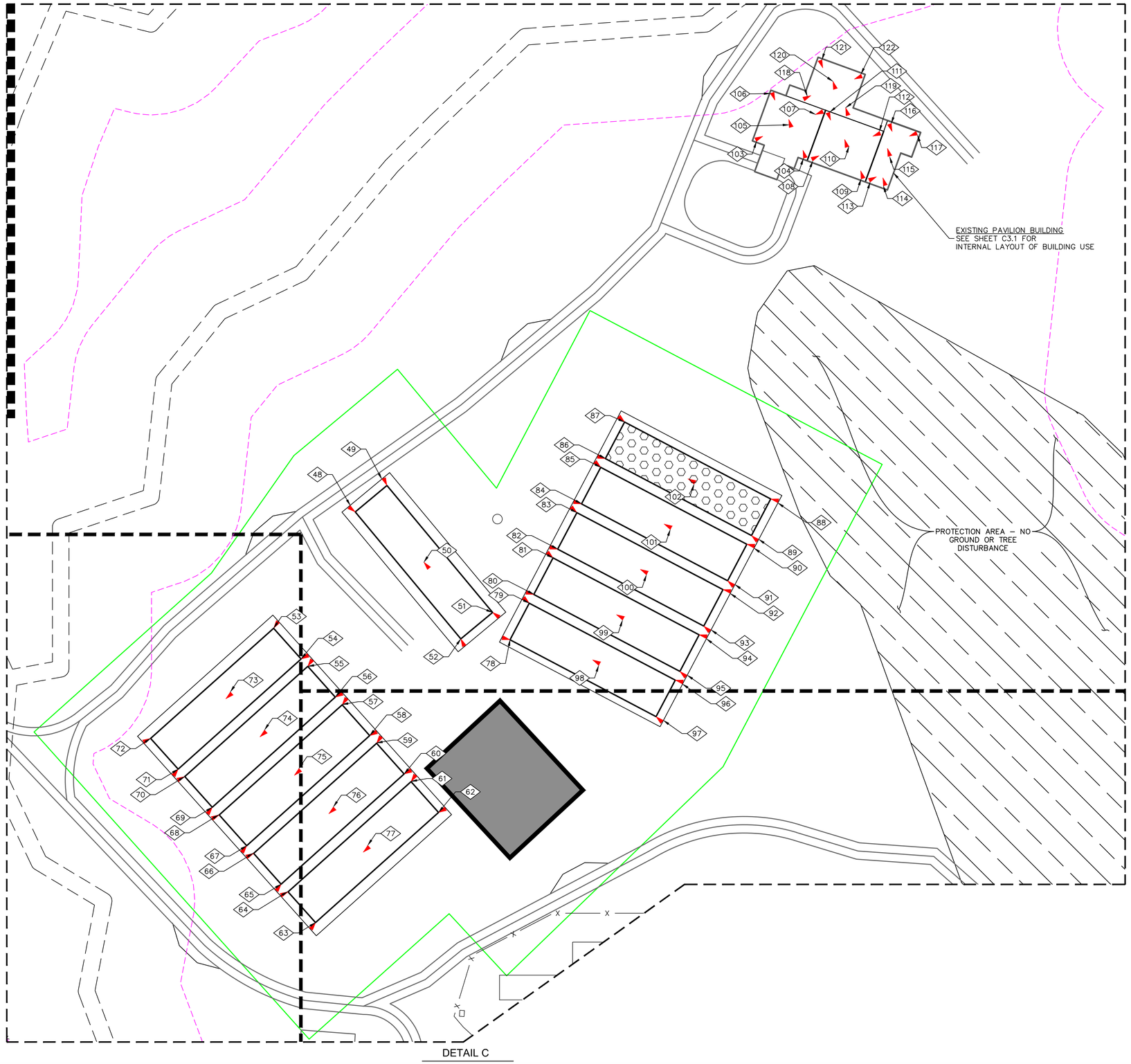
LICENSED PROFESSIONAL
REGISTERED PROFESSIONAL ENGINEER FARHAD S. PITTALWALA No. 86862 CIVIL STATE OF CALIFORNIA
NOT FOR CONSTRUCTION

KHA PROJECT	DESIGNED	GM
197400001	DRAWN	NS
DATE 4/30/2021	CHECKED	FP
SCALE AS SHOWN		

SECURITY PLAN

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C4.0



NOTES

SECURITY NOTES:

1. GATES WILL BE CLOSED AND LOCKED OUTSIDE OF OPERATING HOURS
2. SECURED ENTRY AND ACCESS TO THE CULTIVATION AREA(S) WILL BE CONTROLLED VIA LOCKING GATES LOCATED ON THE WEST SIDE OF THE PROPOSED CULTIVATION AREA(S)
3. ALL GATES WILL BE SECURED WITH HEAVY DUTY CHAINS AND COMMERCIAL GRADE PADLOCKS. ONLY THE LANDOWNER AND APPROVED MANAGERIAL STAFF WILL BE ABLE TO UNLOCK THE GATES ON THE PROJECT PROPERTY.
4. A 100–FOOT DEFENSIBLE SPACE (VEGETATION MANAGEMENT) SHALL BE ESTABLISHED AND MAINTAINED AROUND THE PROPOSED CULTIVATION OPERATION FOR FIRE PROTECTION AND TO PROVIDE FOR VISIBILITY AND SECURITY MONITORING.
5. MOTION–SENSING ALARMS WILL BE INSTALLED AT THE MAIN ENTRANCE TO THE PROJECT PARCEL, TO ALERT PERSONNEL WHEN SOMEONE/SOMETHING HAS ENTERED ONTO THE PREMISES.
6. MOTION–SENSING SECURITY LIGHTS WILL BE INSTALLED ON ALL EXTERNAL CORNERS OF THE PROPOSED CULTIVATION AREA(S), AND AT AT THE MAIN ENTRANCE TO THE PROJECT PARCEL. ALL LIGHTING WILL BE FULLY SHIELDED, DOWNWARD CASTING AND WILL NOT SPILL OVER ONTO OTHER PROPERTIES OR THE NIGHT SKY.

VIDEO SURVEILLANCE:

1. THE OWNER WILL USE A CLOSED–CIRCUIT TELEVISION (CCTV) SYSTEM WITH A MINIMUM CAMERA RESOLUTION OF 1080P TO RECORD ACTIVITY AT ALL SENSITIVE AREAS, IN ANY LIGHTING CONDITIONS, 24 HOURS A DAY AND AT A MINIMUM OF 30 FRAMES PER SECOND.
2. THE CCTV SYSTEM WILL FEED INTO A MONITORING AND RECORDING STATION IN THE ONSITE RESIDENTIAL / OFFICE BUILDING. THE CCTV SYSTEM WILL BE CAPABLE OF SUPPORTING REMOTE ACCESS AND WILL BE EQUIPPED WITH A FAILURE NOTIFICATION SYSTEM THAT IMMEDIATELY NOTIFIES MANAGERIAL STAFF OF ANY INTERRUPTIONS OR FAILURES.
3. ALL RECORDINGS WILL BE KEPT A MINIMUM OF 90 DAYS, AND 7 YEARS FOR ANY CORRESPONDING REPORTED INCIDENTS CAUGHT ON TAPE.
4. AREAS THAT WILL BE COVERED BY CCTV SYSTEM INCLUDE:
   - ENTRY WAYS TO THE PROPERTY, CULTIVATION AREA(S), AND SHOP/PROCESSING FACILITY
   - PERIMETER OF THE CULTIVATION AREA
   - THE MONITORING AND RECORDING STATION
   - INTERIOR OF THE PROCESSING FACILITY

LEGEND

- PROPERTY LINE
- PROJECT BOUNDARY
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- 100' DEFENSIBLE SPACE BUFFER
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION
- 32 — SECURITY CAMERA ID NUMBER
- APPROXIMATE SIZE AND LOCATION OF EXISTING VEGETATION COMPOST AREA
- PROTECTION AREA – NO TREE OR GROUND DISTURBANCE
- "BUILDING #1" – PROPOSED COLD STORAGE BUILDING

NORTH

GRAPHIC SCALE IN FEET
0 30 60 120

No.	REVISIONS	DATE
2	2ND COUNTY SUBMITTAL	4/29/2021
1	1ST COUNTY SUBMITTAL	2/4/2021

APPLICANT:
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LICENSED PROFESSIONAL ENGINEER — PITTALWALA — No. 88862 — CIVIL — STATE OF CALIFORNIA
NOT FOR CONSTRUCTION

KHA PROJECT	DESIGNED	GM
197400001	DRAWN	NS
DATE 4.30.2021	CHECKED	FP
SCALE AS SHOWN		

DETAIL C
SECURITY PLAN

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C4.1

1. PURPOSE AND INTENT OF THE PROPERTY MANAGEMENT PLAN

The intent of the Property Management Plan is to identify and locate all existing 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.

In the following sections, **bold** and *italicized* text indicates Property Management Plan content requirements cited from the Lake County's Commercial Cannabis Cultivation Application Package, Appendix I guidance.

2. PROJECT DESCRIPTION

The subject property is approximately seven miles northwest of the City of Clearlake, CA, at 11650 High Valley Road. The subject property includes a total of seven (7) individual, contiguous parcels, 006-004-070 (649.28 acres), 006-004-240 (429.31 acres), 006-004-250 (10.85 acres), 006-004-060 (39.60 acres), 006-002-04 (321.74 acres), 006-002-09 (103.35 acres), and 006-009-36 (85.83 acres) (See *Appendix E: Project Site Plan*). The combined area of the seven (7) properties is approximately **1,639.96** acres. The site where work is proposed is limited to one parcel where cannabis cultivation and related activities are proposed (006-004-07). This application does not propose cultivation on the remaining parcels. The remaining parcels provide land to meet a requirement for 20 acres of non-cultivation for every 1 acre of proposed cultivation. See Figure 2-1 – Regional Location Map and Figure 2-2-Project Vicinity Map.

Lake County Zoning Ordinance, Article 27, subsection (a) in part regulates cannabis cultivation in Lake County. The total acres within the subject property is sufficient to support the new Type A3 medium outdoor cultivation licenses, which requires 20 acres per one-acre license. The subject property is not located within an "exclusion overlay district" (Lake County, 2020) that would preclude the cultivation of cannabis. The applicant is pre-enrolled with the Regional Water Quality Control Board (Application Number: 429205) under a Tier 2 Low Risk.

The applicant is proposing the following licenses to occur on APN 006-004-070: (80) A type 3 outdoor cultivation, (1) type 11 distributor, and (1) A type 4 nursery licenses. The applicant is requesting approval of a Use Permit for the 80 acres of outdoor cannabis cultivation along with the aforementioned nursery and distribution. The 5-acre nursery area would be used for both immature plants as well as Research and Development.

The majority of the subject parcels and all proposed cultivation areas are located in the western portion of the High Valley Area in the High Valley Basin. The northerly parcels are located in the Long Valley Basin, but no cultivation or other activities are proposed in these locations.

The subject property is largely undeveloped with a few residences, mobile homes, structures and outbuildings. The existing residences and mobile homes would be utilized by employees throughout the cultivation season. The current use of areas proposed for cultivation is vacant agricultural land that is regularly plowed for vegetation management and brush clearing, and area previously grazed by cattle and horses. The subject property contains existing paved and unpaved roadways that would be used to access the proposed cultivation areas in APN 006-004-070.

Existing structures within the subject property occur on two of the parcels, APN 006-004-250, and APN 006-004-070. No cultivation or cultivation related activities are proposed for APN 006-004-250, but this property contains two residences and a single outbuilding. Within APN 006-004-070, the only parcel in which cultivation would occur, there is one residence, a conference building, two classrooms, two offices, two barns (one pole barn), a storage shed, a shop, a stable, a fuel storage area, and four metal shipping containers. With the exception of the approximate 13,000 square foot (sf) conference building, all structures are between 500 to 2,000 sf. As outlined on the site plan, some of the existing structures would be used to securely store materials such as fertilizers, irrigation equipment, and machinery needed to facilitate cultivation.

The proposed cultivation areas would be located on gently sloping and flat terrain. The area where cultivation is proposed (006-004-070) contains Valley Oak tree populations and has a series of intermittent

and ephemeral drainages that generally drain to the southwest before flowing off-site at the southern property boundary. The subject area also contains ephemeral drainages. The cultivation areas have been situated between large stands of trees, around individual trees, and setback for at least 100' from all drainages and waters identified on site (See Figures in Appendix F). Thus, no removal of any trees or encroachment in any waters of the United States (US) or waters of the state would occur. Four groundwater wells exist on the cannabis cultivation property (APN 006-004-070) as depicted on Figure 3 in Section 7 of the Application Package. Well #4 is located at the southeast corner of the property and a well performance test has been prepared (see Section 7). A new well would be drilled in the center of the property to provide supplemental water supply or redundancy for the irrigation system. Two on-site wells will provide sufficient water for the proposed cannabis cultivation and related uses.

The applicant would construct 10 drying sheds for drying of cannabis product and 1 cold storage shed for storage of cannabis products. Each structure would be approximately 10,000 sf, comprising a total of approximately 110,000 sf within the same parcel where cannabis cultivation is proposed (006-004-070). All areas would be secured, and all materials stored in accordance with County and State requirements.

Cannabis cultivation would occur in four cultivation areas within APN 006-004-070, which would total 80 acres of outdoor cannabis cultivation. The cannabis would be irrigated by groundwater from on-site wells, as described above. No artificial lighting is proposed for the cultivation. A five-acre nursery would be located between the four cultivation areas. *Site Access* – All of the existing structures are located in proximity to the centrally located east-west driveway that provides primary access to the subject property. All of the proposed cultivation areas would be primarily accessible from this driveway or short interior roads.

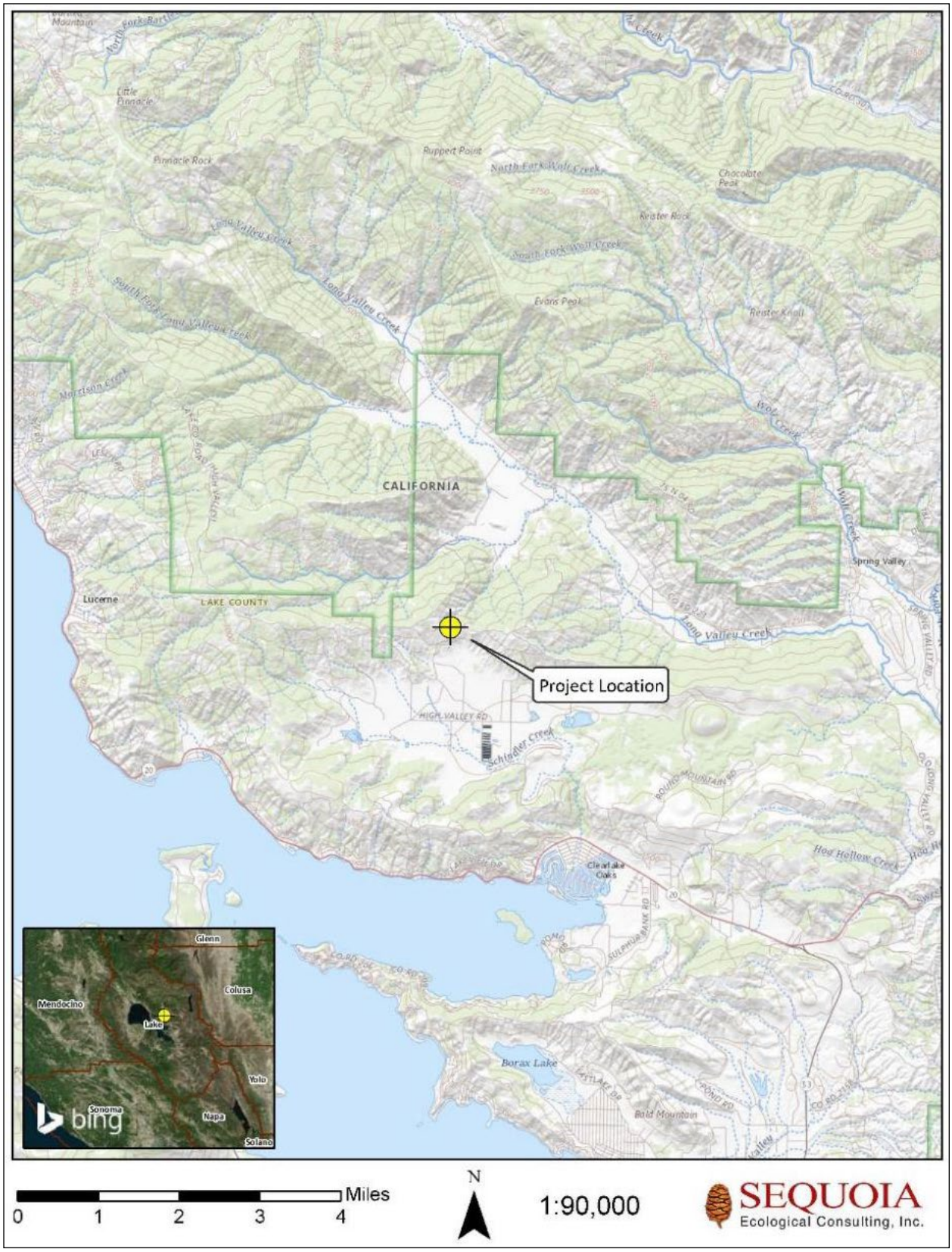
High Valley Road is the primary roadway within the vicinity of the proposed project and provides access to the project site through APN 006-004-070. The existing private road and interior access roads are both paved and unpaved and would provide direct access the interior of the project site. As part of the project, the driveway approach at High Valley Road would be improved to Caltrans standards for a commercial driveway and would have a 14-foot gate located at least 30 feet from the roadway. As such, the project site will have access to a public road or a recorded easement that allows for, but not limited to, delivery trucks, emergency vehicles, sheriff and other law enforcement officers, and government employees who are responsible for inspection or enforcement actions.

All driveways and interior roadways will be improved constructed and maintained if/as needed in compliance all Federal, State and local agency requirements and maintained so as to prevent road surface and fill material from discharging to any surface water body. The design of the driveway and interior access roads on the project site shall be sufficient to be used by all emergency vehicles and shall be approved by the applicable fire district Northshore Fire Protection District (NFPD).

The proposed access road will provide turnouts no more than 400 feet apart and the maximum slope of access roads will not exceed 16 percent. Additionally, any other access gates would have a minimum width of 14 feet to provide access for emergency vehicles. Gates will not be constructed across driveways or access roads that are used by neighboring properties or the general public.

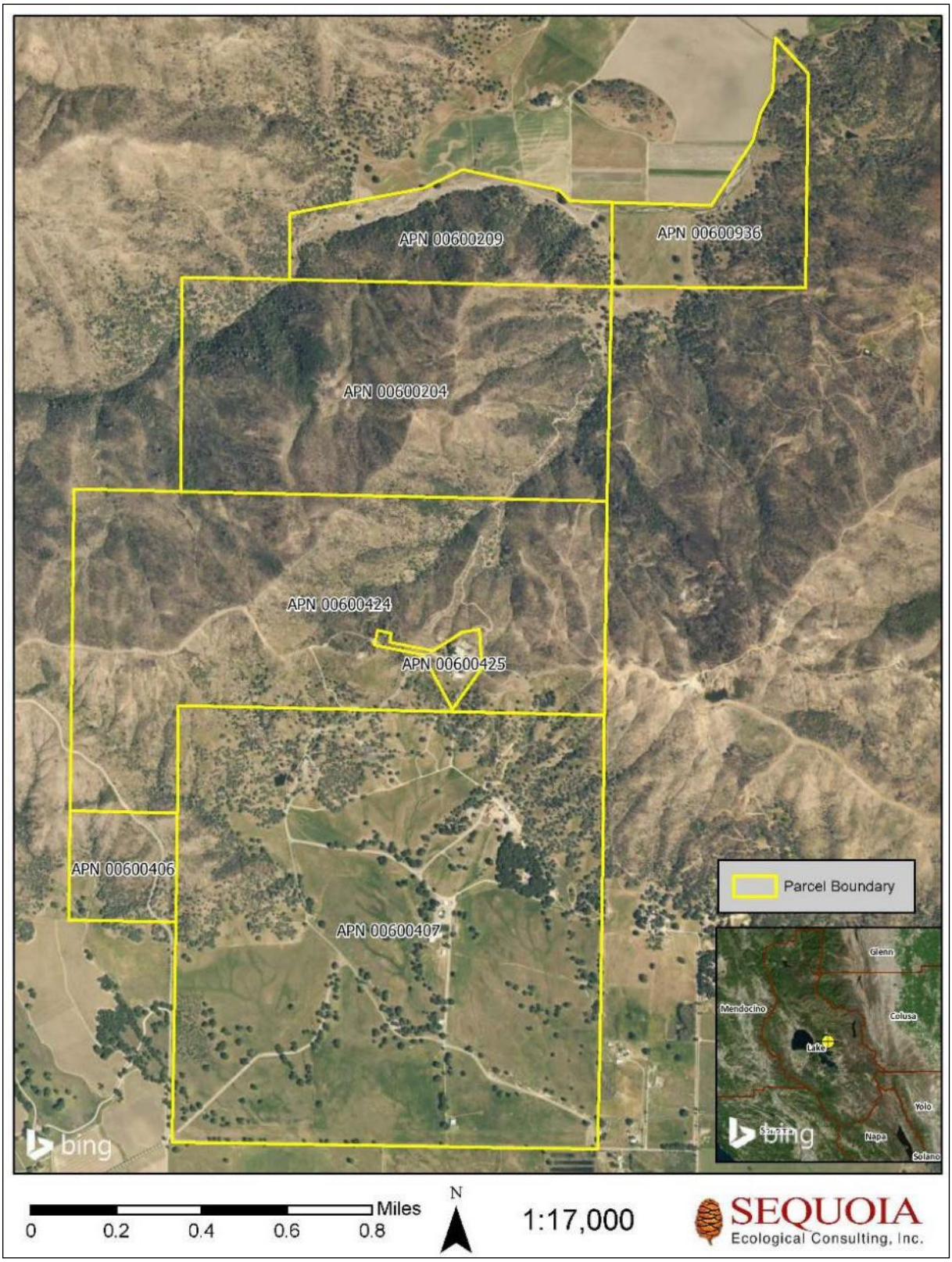
Lighting – The project will include outdoor lighting throughout the project site. All outdoor lighting will be onto the project site and not onto adjacent properties. All lighting equipment will comply with the recommendations of darksky.org and provisions of Section 21.48 of the County Zoning Ordinance. Artificial light shall be completely shielded between sunset and sunrise.

Figure 2-1, Regional Location Map



Source: Sequoia Ecological Consulting, Inc., 2020

Figure 2-2, Property Map for the High Valley Ranch Subject Site



Source: Sequoia Ecological Consulting, Inc., 2020

3. 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).

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

The LCAQMD is a full attainment district for all criteria pollutants and has not adopted specific emissions thresholds for project analysis. The Lake County Air Quality Management District (LCAQMD) does not have any attainment plans because it is in attainment of all criteria pollutants. As shown in the discussion below, construction and operation of the proposed project would not exceed any established thresholds. The project would comply with LCAQMD rules and regulations. Therefore, implementation of the proposed project would not obstruct implementation of an air quality plan and impacts would be less significant.

Gasoline and diesel-powered equipment: The proposed cultivation operation would include the operation of gasoline- or diesel-fueled equipment (e.g., irrigation pumps, loaders, ventilation fans, and potentially gasoline-fueled landscaping equipment) and truck or vehicle trips to and/or from the site by vendors and workers, which would result in direct criteria air pollutant emissions from fuel combustion. The Applicant will properly maintain this equipment to ensure efficient operations. The proposed cultivation operation would not rely on gasoline- or diesel-fueled power generators, except as a backup energy source in the event of a power outage or emergency. Similarly, two backup generators would be used to supply emergency power in the drying sheds. It should be noted that the generation of carbon dioxide would be offset by the outdoor cultivation of plants, which naturally remove carbon dioxide in the air. Proposed drying operations would not require use of additional gasoline or diesel-powered equipment that may result in criteria pollutant emissions.

Fugitive dust: The proposed cultivation operation may generate small amounts of fugitive dust through ground-disturbing activities during initial cultivation and harvest such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. Fugitive dust will be controlled by wetting soils with a mobile water tank and hose, by delaying ground disturbing activities until site conditions are not windy. Additionally, the driveway, access roads, and parking areas of the subject cultivation operations areas will be graveled and maintained.

Odors: No significant odor impacts are anticipated from the proposed cultivation and drying operations, due to the adequate operational setbacks from public roads, property lines, and neighboring residences/outdoor activity areas. Further, there is a limited residential population within the area that could be impacted by project-related odors. If an odor control plan is required, it would contain measures that would ensure the proposed project would not propagate objectionable odors which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public, or that endanger the comfort, repose, health, or safety of any of those person or the public.

b) All cannabis permittees shall obtain an Authority to Construct permit pursuant to LCAQMD Rules and Regulations, prior to the construction of the facility described in the Property Management Plan.

c) *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.*

d) *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.*

Any person or organization proposing to construct, modify, or operate a facility or equipment that may emit pollutants from a stationary source into the atmosphere must first obtain an Authority to Construct from the Lake County Air Quality Management District (LCAQMD). The proposed project would require construction of 10 drying sheds and one cold storage facility. Construction would have the potential to result in temporary emissions of GHG that would cease immediately upon completion of the approximate four-month construction period. Further, the project operation would require limited use of gasoline and diesel-powered equipment in case of emergencies. Therefore, the project would not contribute significantly to regional emissions or cause an issuance of air containment. Notwithstanding, the proposed project would be required to obtain an Authority to Construct Permit in accordance with applicable LCAQMD requirements.

e) *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.

Thomas Armstrong will serve as the Community Liaison/Emergency Contact and primary point of contact for responding to odor complaints and can be contacted via phone at (908) 304-4918 and tom@sourzfarms.com.

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.

The Applicant will provide property owners and residents within a 1000-foot radius of the proposed cannabis facility with the name, cell phone number, and email address of the Community Liaison/Emergency Contact by Certified Mail after Lake County issues the building permits. The Applicant will encourage neighboring residents to contact the Community Liaison/Emergency Contact to resolve any operating problems before contacting County Officials/Staff.

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.

It should be noted that the odor from the cultivation of Cannabis only occurs during the flowering period of the plant. In an outdoor full season growing situation, the odor emanating from the growing operations will occur primarily during September and October and will cease once the plants are harvested. Odor complaints will be followed up immediately with an assessment of the odor-producing situation; depending on the time of year, different solutions may be employed to remedy the situation.

The Community Liaison/Emergency Contact will follow a standard operating procedure that includes:

1. Receipt of the complaint and logging the complaint

2. Follow up with the concerned party either in person or via phone/email
3. Investigation of odor source
4. Implementation of remediation
5. Follow up with concerned party to determine if odor nuisance is corrected
6. Report of remediation recorded into the Operations Log.

Proposed drying operations would not result in odors due to sufficient distance from adjacent parcels.

d. The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.

The project would include outdoor cannabis cultivation, and mitigating odor impacts through add-on pollution-control equipment would not be feasible. However, the project will include adequate setbacks from neighboring properties and structures to limit off-site odor (See Figures in Appendix F). Additionally, the proposed drying sheds would have the potential to result in odors. These impacts would be mitigated through the use of activated carbon filters and use of an element air purification system.

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.

In the event the methods above are inadequate to fully prevent offsite nuisance conditions, the Applicant will conduct supplemental investigation of the odor source, collaborate with relevant parties, and organize a specific response plan. These activities will be noted in the Operations Log.

4. 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.

A Cultural Resource Evaluation was conducted for the subject area in August 2020. The purpose of the investigation was to locate, describe, and evaluate any archaeological or historical resources that may be present in the area. In addition, the author was to assess the impact that might occur as a result of ground disturbance activities associated with cannabis cultivation. Findings of this report are provided below, and a full report is provided in Attachment B of this Property Management Plan.

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

Potential construction activities associated with site development would be performed in accordance with all applicable local, State, and federal regulatory systems, including but not limited to those related to cultural resources. Local agencies would be responsible for ensuring that site development complies with applicable regulations, including CEQA, through review and issuance of local permit, license, or other authorization for cannabis cultivation site development activities.

Cultivation is proposed on lands previously plowed or tilled for other agricultural activities. As such, while considered unlikely, excavation could encounter buried historic or archaeological resources or human remains. In the case that potentially valuable cultural resources are discovered, the following procedures would apply:

1. Suspend cultivation immediately within a radius of 50-feet
2. Evaluate all identified cultural resources for CRHR eligibility. Resource evaluations shall be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology, history, or architectural history, as appropriate.
3. If any of the resources meet the eligibility criteria identified in PRC Section 5024.1 or State CEQA Guidelines Section 21083.2(g), mitigation measures will be developed and implemented in accordance with State CEQA Guidelines Section 15126.4(b) before cultivation resumes.

Further, one significant prehistoric site was discovered on the subject site during the field inspection (See Attachment B for the location map). No work is proposed within the boundary of the prehistoric site. The proposed project would protect the identified site as open space and limit ground disturbance within the mapped boundary before, during, and after site development. If ground disturbance becomes necessary within this area, a data recovery plan would be developed and carried out as required.

Accidental Discovery

In keeping with the CEQA guidelines, if archaeological remains are uncovered, work at the place of discovery should be halted immediately until a qualified archaeologist can evaluate the finds (§15064.5 [f]). Prehistoric archaeological site indicators include obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and hand stones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire-affected stones. Historic period site indicators generally include fragments of glass, ceramic, and

metal objects; milled and split lumber; and structure and feature remain such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

The following actions are promulgated in the CEQA Guidelines Section 15064.5(d) and pertain to the discovery of human remains:

If human remains are encountered, excavation or disturbance of the location must be halted in the vicinity of the find, and the county coroner contacted. If the coroner determines the remains are Native American, the coroner will contact the Native American Heritage Commission. The Native American Heritage Commission will identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent makes recommendations regarding the treatment of the remains with appropriate dignity.

b) The Department will consult with appropriate Tribe(s) 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.

c) 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.

The Cultural Resources Report for this property is located in Appendix A. As part of the Cultural Resource Evaluation, a request was sent to the California Native American Heritage Commission (NAHC) on July 14, 2020 for a review of the Sacred Lands File. It was discovered that there were no tribal cultural sites recorded for the area (see Attachment B). An email was also sent to Ms. Alix Tyler (Tribal Historic Preservation Officer) of the Elem Indian Colony for input, but no response from Ms. Tyler was received.

As part of the Initial Study being prepared for the project, tribal consultation will be conducted Pursuant to Assembly Bill (AB) 52. Native American organizations to be contacted are listed in **Table 4-1: NAHC Native American Contact List** below. If as a result of tribal consultation completed to satisfy AB 52, the presence of a tribal monitor is requested by interested tribes, the Applicant agrees to add tribal monitoring into mitigation measures into the CEQA document.

Table 4-1: NAHC Native American Contact List

Organization	Contact
Elem Indian Colony Pomo Tribe	Kim Cole, Tribal Administrator
Elem Indian Colony Pomo Tribe	Thomas Brown, Cultural Resources Director
Elem Indian Colony Pomo Tribe	Agustin Garcia, Chairperson
Guidiville Indian Rancheria	Merlene Sanchez, Chairperson
Koi Nation of Northern California	Darin Beltran, Chairperson
Koi Nation of Northern California	Rob Morgan, Tribal Historic Preservation Officer
Middletown Rancheria	Sally Peterson, THPO

Middletown Rancheria of Pomo Indians	Jose Simon, Chairperson
Mishewal-Wappo Tribe of Alexander Valley	Scott Gabaldon, Chairperson
Robinson Rancheria of Pomo Indians	Eddie J. Crandall, Chairperson
Yocha Dehe Wintun Nation	Anthony Roberts, Chairperson

5. ENERGY USAGE

Intent: Permittees shall minimize energy usage.

Energy Sources

Outdoor cannabis cultivation practices involve a lower energy demand than indoor cultivation. The proposed project would not construct new structures that would result in a substantial increase in energy demand. New structures are limited to 100,000 sf of dry storage and 10,000 sf of cold storage, fencing, and potentially one additional well. The structures would be used for approximately two months out of the year primarily during the harvest season. The proposed project would use an existing on-grid power source provided by Pacific Gas & Electric (PG&E) to power lights and electrical equipment associated with existing residential units and bunkhouses, security systems, security lighting, and well pumps. Additionally, energy resources would be required for drying proposed on site. Gasoline and/or diesel fuel will be used to power backup generators for emergency use in the proposed drying sheds. As a part of the proposed project, all plans will be verified to comply with PG&E requirements, should development be located in close proximity to a PG&E facility. This will include, but is not limited to, setbacks, limits to grading, access, inspections, loading of roadways, excavation, boring, and fencing. All elements would be considered prior to any work that could affect PG&E lines or facilities

a) Provide energy calculations as required by the California Building Code[2].

Table 5-1: High Valley Ranch – Energy Demand

Appliance	Location	Quantity	Watts per Unit	Annual Demand (watts)
Water Pump	Cultivation	7	3000	17,640,000
Fan	Drying	132	40	3,801,600
Dehumidifier	Drying	12	1900	16,416,000
Security Camera	Drying	55	6	475,200
Lights	Drying	110	100	1,320,000
Central AC	Cold Storage	1	3500	30,660,000
Computer	Shared Space	4	120	1,401,600
Security System	Shared Space	4	450	15,768,000
Security Lights	Shared Space	50	60	1,095,000
Printer	Shared Space	1	45	675
Coffee Maker	Shared Space	2	1500	630,000
Refrigerator	Shared Space	1	1000	8,760,000
Freezer	Shared Space	1	1000	8,760,000
Cooking Units	Residential	5	4000	4,200,000
Living Area	Residential	15,827	3	9,971,010

Laundry Circuits	Residential	2	1500	630,000
Clothes Dryer	Residential	3	5000	3,150,000
Water Heater	Residential	4	4000	3,360,000
Total Energy Demand				**128,039,085**

b) Identify energy conservation measures to be taken and maintained including providing proof of compliance with CCR Title 3, Division 8, Chapter 8305 the Renewable Energy Requirements.

Energy Conservation Measures

The project will implement the following Energy Conservation Best Practices:

- Turn off lights and unnecessary electronics when possible;
- When feasible, motion activated lights in offices and bunkhouses will be added;
- Reduce "plug" load by removing personal equipment such as desk lamps and space heaters or installing smart power strips;
- Use energy efficiency features in all technology including computers, data storage, or other devices which consume excess energy;
- Replace and recycle old electronics;

The proposed project only includes outdoor cannabis cultivation and the operation is not subject to requirements of CCR Title 3, Division 8, Chapter 8305, which only applies to Indoor and Tier 2 Mixed-Light cultivation operations.

c) If alternative energy sources are to be used, describe those sources and the amount of electricity that will be provided.

The Applicant is exploring the use of solar energy for electrical generation within the project property; however, no design work or action has been taken to date. This Project Management Plan will be updated if solar electricity sources are added to the site.

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.

The proposed cannabis cultivation operation includes outdoor operations only. No indoor cultivation or

mixed light facilities are proposed on the project property.

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

To monitor the proposed cultivation operation's energy consumption, and to provide Lake County officials with accurate energy use records, the Applicant will:

- Log and maintain monthly fuel consumption records,
- Maintain accurate record keeping regarding performance of the proposed cultivation operation,
- Make records and relevant data available to Lake County officials, and
- Adjust strategies as needed to meet energy conservation goals.

6. FERTILIZER USAGE

Intent: To ensure consistency of fertilizer storage and use with 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;

Application rates and methods for all fertilizers used will be consistent with product labeling. Fertilizer will be applied during the vegetative and blooming phases of the cannabis plants' life cycle to promote healthy plant growth and development.

b) Storing fertilizers in a secure building or shed;

When not in use, all fertilizers/nutrients will be stored under cover, and within existing structures on-site, and in compliance with label instructions within a secure nutrient materials storage shed located on the subject property. The storage structures would have a minimum of 100 feet of defensible space and fuels reduction around structures, as required by CCR 1271 and PRC 4291.3. All liquid fertilizers will be stored in separate secondary containment that is of sufficient volume and material to adequately contain any spills or leaks. All fertilizers shall be stored in their original container, and with their original labels. Fertilizers shall not be placed in a new container to conserve space, or for any other reason. In the event that a label becomes illegible, the product shall be disposed of according to the hazardous waste policies of the local waste management service, and shall be replaced with a new product to prevent the misuse of any chemical.

Personnel will be trained on how to appropriately prepare and apply fertilizers/nutrients before being allowed to use them. When using/preparing fertilizers and other chemicals, personnel will be required to use personal protective equipment (PPE) consistent with the materials safety data sheet/safety data sheet (MSDS/SDS) recommendations for the product they're using/preparing.

c) Containing any fertilizer spills and immediately clean up any spills;

All fertilizers/nutrients will be stored in their manufacturer's original containers/packaging in an on-site storage shed to prevent possible exposure to the environment. Absorbent materials designed for spill containment and spill cleanup equipment will be maintained within the fertilizer materials storage area and adjacent to the fertilizers/nutrients mixing/preparation area, for use in the event of an accidental spill. If there is a spill or accidental discharge to any waters of the site, staff will immediately notify appropriate personnel to determine if actions are needed to protect public safety. In case of a major spill of fertilizers or petroleum products, the permittee shall immediately notify:

- The Department of Toxic Substances Control (916) 255-6610;
- The California Office and Emergency Services at (800) 852-7550 and initiate cleanup activities for all spills that could enter surface waters of degrade groundwater;
- The lake County Fire Protection District Headquarters Station at (707) 994-0733; and
- The California Department of Fish and Wildlife within 24 at (707) 445-6493.

d) Applying the minimum amount of product necessary;

Nutrient solutions with nitrogen (N), phosphorus (P), and potassium (K) values, will be applied on an "as needed" basis for vegetative growth and overall plant health. Natural fertilizers and single ingredient soil amendments will be used. The following Organic Materials Review Institute certified fertilizers are proposed: Syl-Coat, Regalia CG, Venerate CG, GranDEVD CG, Bio-TAM, Zentari DF, Azaguard, Dipel DF, Purespray Green, and Trigger.

e) Preventing offsite drift;

All fertilizers/nutrients will primarily be applied in a liquid or solid form directly to the growing medium. Fertilizer application will occur in a controlled environment, using appropriate tools to minimize risk of 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;

Fertilizers will only be applied using spray-application when wind patterns are blowing away from surface water bodies and application sites.

g) Not applying fertilizer when they may reach surface water or groundwater; and

h) Not 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.

All fertilizers/nutrients will be mixed/prepared at least 100 feet from surface water resources and will not be applied or allowed to drift offsite or within riparian setbacks (minimum 100 feet) (See Figures in Appendix F). Fertilizers/nutrients will not be applied at a rate greater than 319 pounds of nitrogen per acre per year (requirement of the State Water Resource Control Board's Cannabis General Order).

Additionally, the Applicant would enroll in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2017-0023-DWQ. Ongoing compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight.

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 or 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.

Refer to the plan set located in Appendix B on Sheet C3.0 labeled Proposed Site Plan. Waters on site were identified with a preliminary hydrologic analysis by a professional biologist. The site plan shows 100-foot setbacks from all waters identified on the lot of record and adjacent lots where no work or fertilizer application will occur. Fertilizer will be stored in the existing structures located on-site each of which are located more than 100 feet from waterways on the lot of record.

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

The proposed project will maintain an accurate log of all fertilizer/nutrient procurement and usage of the proposed cultivation operation. The log will detail the date, fertilizer type, amounts applied, method, the operator applying, and any additional inputs or amendments. This log will be kept within the on-site storage shed and will be made available to State and County officials upon request.

7. FISH AND WILDLIFE PROTECTION

Intent: To minimize adverse impacts on fish and wildlife.

A Biological Resources Report was prepared for the project area in October 2020. The Report provides a description of existing biological resources on the project site and identifies potentially significant impacts that could occur to sensitive biological resources resulting from construction of the proposed cannabis cultivation operation. Key findings of the report are summarized below, and the full report is provided in Attachment A to this Property Management Plan.

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;

Figure 7-1 shows special-status wildlife species occurrences within 5 miles of the project site. Seven special-status wildlife species have been previously documented (CNDDB occurrences) within 5 miles. A number of these species require specialized habitat such as cobble-lined streams or large freshwater lakes that are not found on the project site. Due to lack of suitable habitat and/or lack of recent occurrences in the project vicinity, five special-status wildlife species with potential to occur in the region are not expected to occur on the project site: foothill yellow-legged frog, Clear Lake hitch (*Lavinia exilicauda chi*), Clear Lake tule perch (*Hysterocarpus traskii lagunae*), Sacramento perch (*Archoplites interruptus*), and osprey (*Pandion haliaetus*).

While no special-status bird species were identified within the project vicinity, the project site contains suitable habitat for nesting birds. Project implementation would not remove trees or suitable habitat from the project site, but cultivation activities would have potential to impact nesting birds. Therefore, the following mitigation measures will be implemented:

BIO-1a: Migratory Birds and Raptors/Nest Avoidance

Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside the Project site where birds could be disturbed by construction-related noise or earth-moving vibrations.

If active nest, roost, or burrow sites are identified within the Project site, a no disturbance buffer shall be established for all active nest sites prior to commencement of any proposed Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors will be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the

supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work will have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

Three special-status species with potential to occur on site include the Western Pond Turtle, Townsend's Big-eared Bat, and Pallid Bat. These species are described in further detail below.

Western Pond Turtle

The western pond turtle, a California Species of Special Concern, is the only freshwater turtle native to greater California and is distributed along much of the western coast, from the Puget Sound in Washington south to the Baja Peninsula, Mexico (Storer 1930). Overall, western pond turtles are habitat generalists, and have been observed in slow-moving rivers and streams (e.g., in oxbows), lakes, reservoirs, permanent and ephemeral wetlands, stock ponds, and sewage treatment plants. They prefer aquatic habitat with refugia, such as undercut banks and submerged vegetation (Holland 1994), and require emergent basking sites, such as mud banks, rocks, logs, and root wads to thermoregulate their body temperature (Holland 1994, Bash 1999). Pond turtles are omnivorous and feed on a variety of aquatic and terrestrial invertebrates, fish, amphibians, and aquatic plants.

The western pond turtle is known from two CNDDB occurrences within 5 miles of the project site (CNDDB Occurrence No. 601 and 579). The freshwater pond on the project site provides somewhat suitable basking, foraging, and breeding habitat, with adequate upland nesting habitat present within the adjacent grassland and woodland. The Western pond turtle was not observed in the pond habitat or surrounding uplands during the September 2020 surveys. However, the pond is not located in an area where cannabis cultivation and development are proposed.

Townsend's Big-eared Bat

Townsend's big-eared bat (*Corynorhinus townsendii*) is designated as a California Species of Special Concern and High Priority species by the Western Bat Working Group (CDFW 2019). The Townsend's big-eared bat is an uncommon resident throughout California, inhabiting mesic environments. The species is a moth specialist and typically roosts in cavities measuring 16 inches in diameter or greater in caves, mines, bridges, building, rock crevices, tree hollows in coastal lowlands, and cultivated valleys and nearby hills characterized by mixed vegetation below 11,000 (Sherwin and Rambaldini 2017b). Townsend's big-eared bats exhibit a high site fidelity and are highly sensitive to disturbance. They forage by gleaning insects from trees and shrubs along edge habitats near water. Foraging bouts peak in late evening and may span long distances. Winter hibernacula are used from October to April.

The closest known record for Townsend's big-eared bat is located immediately north of the project site; however, the date of this occurrence is approximately 70 years old making it historical (CNDDB Occurrence No. 631; Figure 10). Regardless, the mature oak trees and man-made structures on the project site provide suitable roosting habitat; however, as currently designed, the proposed project will not impact trees or structures. If Townsend's big-eared bats are identified roosting on or immediately adjacent to the project site, the following mitigation measure will be implemented:

Mitigation Measure BIO-1b: Roosting Bats

A qualified biologist shall be hired to conduct surveys for special-status bats (Townsend's big-eared bat and pallid bat) no more than two weeks prior to planned commencement of

construction activities that have the potential to disturb bat day roosts or maternity roosts through elevated noise levels or removal of trees. If a visual survey is not sufficient to determine the presence/absence of bats, acoustic equipment (e.g., AnaBat) shall be used to determine potential occupancy type of species present. If an active maternity roost is detected, a qualified biologist shall determine an appropriate avoidance buffer to be maintained from April 1 until young are flying (typically through August). If an active day roost is detected in a tree or structure planned for removal, or within a zone of influence (i.e., area subject to noise, vibration) that could result in roost abandonment, as determined by a qualified biologist, the bats shall be safely evicted under the guidance of a qualified biologist. Day roosts shall not be removed unless the daytime temperature is at least 50 °F and there is no precipitation. Mitigation for day roosts impacted by the project will be achieved through the installation of bat houses on-site to replace lost roosts at a 1:1 ratio. Replacement roosts will be placed at the discretion of the qualified biologist.

Pallid Bat

The pallid bat (*Antrozous pallidus*) is designated as a California Species of Special Concern by CDFW and a Medium Priority species by the Western Bat Working Group. The pallid bat is a relatively large, light-colored bat ranging throughout the southwestern United States from interior British Columbia to Mexico. They inhabit foothills and lowlands near water throughout California below 6,560 feet in elevation, but are most abundant in arid deserts and grasslands, particularly in areas with rock outcrops near water (Hermanson and O'Shea 1983). Pallid bats typically roost in small groups in a variety of roosts, including bridges, buildings, tree hollows in coast redwoods, bole cavities in oaks, exfoliating bark, rock crevices in outcrops and cliffs, caves, and mines, as both day and night roosts (Sherwin and Rambaldini 2017a).

The only known record for pallid bat within 5 miles of the Property is located approximately 3.5 miles southeast of the project site. This occurrence is dated to 1945 making it historical (CNDDB Occurrence No. 183). Regardless, the mature oak trees and man-made structures on the project site provide suitable roosting habitat; however, as currently designed, the proposed project will not impact trees or structures.. If pallid bats are identified roosting on or immediately adjacent to the project site, mitigation measure BIO-1b will be implemented.

b) A description of the habitats found on the lot of record. These habitats shall be located on a map;

Figure 7-1 identifies habitat types found on the project site. Habitats present on the project site are described below.

Agricultural Field

The agricultural fields account for approximately 269.04 acres on the project property. The agricultural fields on the project site are regularly disked and were observed to be completely devoid of vegetation during the September 28-29, 2020 site surveys. As a result of routine manipulation of soils, no small mammal burrows or other suitable plant or wildlife habitat were present within the agricultural fields. These fields are regularly used for livestock grazing during the growing season. Dominant species along the outer edges of the agricultural fields are comprised of ruderal and non-native species, such as wild oat (*Avena* spp.), European heliotrope (*Heliotropium europaeum*), yellow star thistle (*Centaurea solstitialis*), turkey mullein (*Croton setiger*), stinking goosefoot (*Chenopodium vulvaria*), vinegarweed

(*Trichostemma lanceolata*), ribwort plantain (*Plantago lanceolata*), and Harding grass (*Phalaris aquatica*).

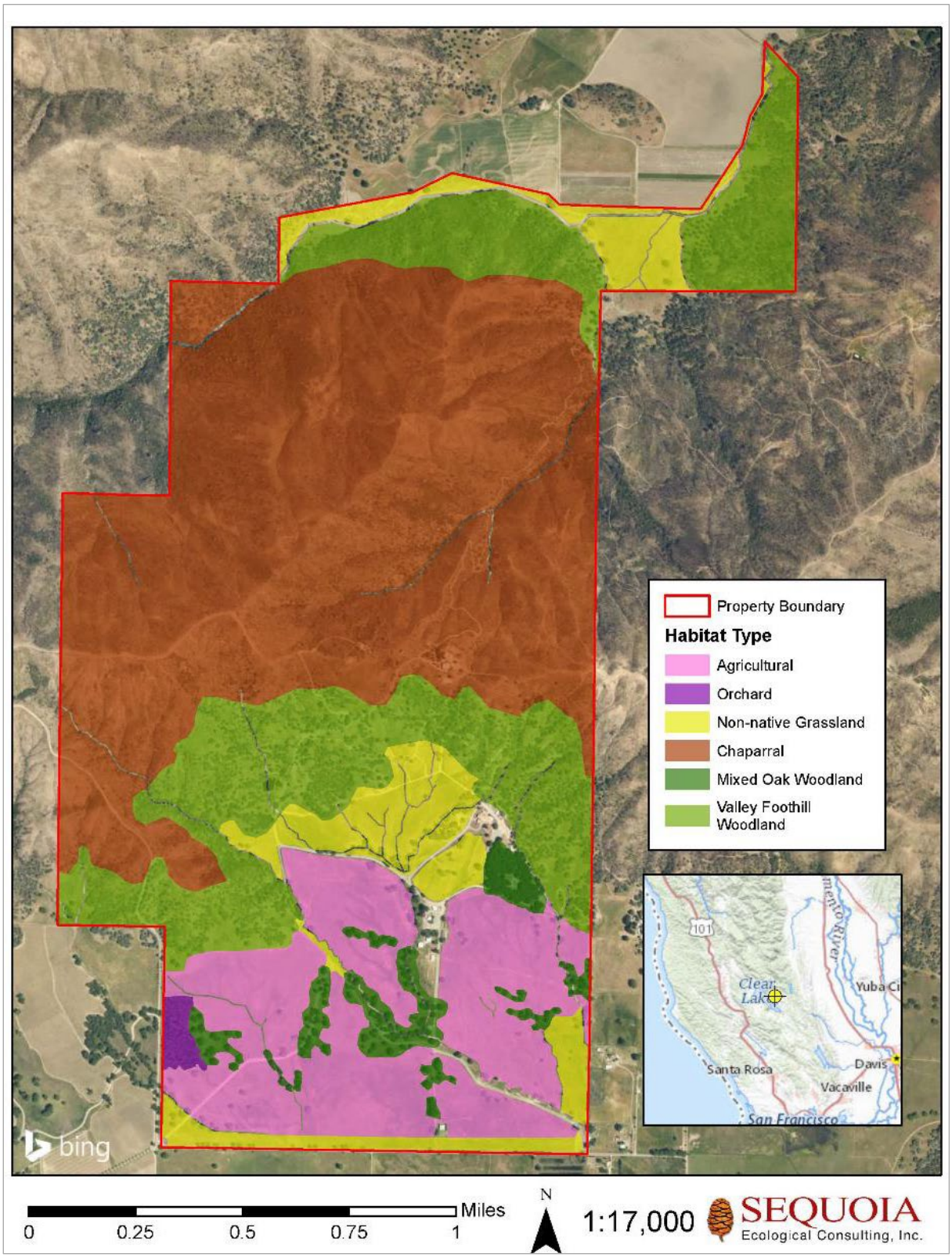
Common wildlife species observed within agricultural fields on the project site include European starling (*Sturnus vulgaris*), western meadowlark (*Sturnella neglecta*), red-winged blackbird (*Agelaius phoeniceus*), lesser goldfinch (*Spinus psaltria*), house finch (*Carpodacus mexicanus*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), and western fence lizard (*Scleoporus occidentalis*).

Anthropogenic

Anthropogenic communities account for approximately 5.69 acres on the project property. Anthropogenic communities are communities dominated by plants introduced by humans or maintained by human disturbance. These communities are often around residential, commercial, and industrial developments. On the project site, the areas surrounding the residences and agricultural buildings are vegetated by ruderal species, including Canada horseweed (*Erigeron canadensis*), chicory (*Chicorum intybus*), yellow star thistle, turkey mullein, and fluellin (*Kickxia elatine*).

Common wildlife species observed within the anthropogenic communities on the project site are consistent with those seen in other habitat types, and include house finch, Say's phoebe (*Sayornis saya*), western bluebird (*Sialia mexicana*), western fence lizard, and lesser goldfinch.

Figure 7-1, Plant Communities on the Project Site



Source: Sequoia Ecological Consulting, Inc., 2020

Non-native Annual Grassland

The non-native annual grassland community accounts for approximately 138.75 acres on the project property. Non-native annual grassland is comprised primarily of plant species that mature in spring and early summer, before spreading seed and dying in late summer and fall. Non-native annual grassland is found in several areas across the project site, but primarily within the southern third of the Property. Dominant grass and forb species observed within non-native annual grassland communities on the project site include slender wild oat, medusa head grass (*Elymus caput-medusae*), Harding grass, yellow star thistle, brome grasses (*Bromus* spp.), field bindweed (*Convolvulus arvensis*), Indian milkweed (*Aesclepias eriocarpa*), and common willowherb (*Epilobium ciliatum*).

Wildlife species observed in the non-native annual grassland communities were consistent with those found in the agricultural fields, but also included savanna sparrow (*Passerculus sandwichensis*), Brewer's blackbird (*Euphagus cyanocephalus*), Say's phoebe, and western bluebird. Several raptor species, including red-tailed hawk (*Buteo jamaicensis*), northern harrier (*Circus hudsonius*), and American kestrel (*Falco sparverius*), were observed utilizing non-native annual grassland as foraging habitat. Other wildlife species observed in the non-native grassland communities included Botta's pocket gopher (*Thomomys bottae*), meadow vole (*Microtus californicus*), pacific gopher snake (*Pituophis catenifer catenifer*), and California ground squirrel (*Otospermophilus beecheyi*).

Chaparral

The chaparral community accounts for approximately 755.77 acres on the project property. Chaparral is a one- to two-layer community characterized by a dominance of drought-adapted sclerophyllous (having thick, leathery leaves), evergreen shrubs approximately 6-13 feet tall (Holland 1986). Dominant shrub and forb species observed within chaparral communities on the project site include chamise (*Adenostoma fasciculatum*), manzanita (*Arctostaphylos* spp.), toyon (*Heteromeles arbutifolia*), yerba santa (*Eriodycton californicum*), sticky monkeyflower (*Diplacus aurantiacus*), naked-stem buckwheat (*Eriogonum nudum*), and Pacific stonecrop (*Sedum spathulifolium*). Woody species observed in the chaparral communities include western redbud (*Cercis occidentalis*), California buckeye (*Aesculus californica*), mountain mahogany (*Cercocarpus betuloides*), and leather oak (*Quercus durata*).

Common wildlife species observed within the chaparral community on the project site include California scrub jay (*Aphelocoma californica*), acorn woodpecker (*Melanerpes formicivorus*), California quail (*Callipepla californica*), and mourning dove.

Orchard

The orchard community accounts for approximately 8.08 acres on the project property. In many areas of California, plantations of trees (i.e., orchards) have been established for various purposes. Many are planted for agricultural purposes while others are planted for use as windbreaks. Numerous English walnut trees (*Juglans regia*) are planted in the southwestern corner of the project site.

Wildlife species observed within the orchard community on the project site were consistent with those seen in the mixed oak woodland and agricultural habitats.

Valley Foothill Woodland

The valley foothill woodland community accounts for approximately 358.66 acres on the project property. The northern portion of the Property is dominated by valley foothill woodland, a habitat type characterized by a combination of deciduous and coniferous trees generally found in areas of higher

elevation. This community is primarily comprised of gray pine (*Pinus sabiniana*), interior live oak (*Quercus chrysolepis*), and valley oak (*Quercus lobata*).

Wildlife species observed within the valley foothill woodland community on the Property include chestnut-backed chickadee (*Poecile rufescens*), acorn woodpecker, red-breasted nuthatch (*Sitta canadensis*), turkey vulture (*Cathartes aura*), and red-tailed hawk.

Mixed Oak Woodland

The oak woodland community accounts for approximately 44.10 acres on the project property. Mixed oak woodland is a community found throughout California and is dominated by multiple species of oak trees (*Quercus* spp.). This habitat is present in several areas across the Property and is comprised of interior live oak, valley oak, and blue oak (*Quercus douglasii*) trees. Understory composition varies between grassland and ruderal communities, and grasses such as bristly dogtail grass (*Cynocurus echinatus*), wild oats, yellow star thistle, red brome (*Bromus madritensis*), and ripgut brome (*Bromus diandrus*) were common.

Wildlife species observed within the oak woodland communities on the project site include acorn woodpecker, Nuttall's woodpecker (*Picoides nuttallii*), oak titmouse (*Baeolophus inornatus*), chestnut-backed chickadee, yellow warbler (*Setophaga petechia*), black-throated gray warbler (*Setophaga nigrescens*), yellow-rumped warbler (*Setophaga coronata*), northern flicker (*Colaptes auratus*), Cooper's hawk (*Accipiter cooperii*), and tree swallow (*Tachycineta bicolor*).

Ephemeral Drainages

Ephemeral drainages occur on the project site. Ephemeral drainages are classified as Class III Watercourses by the Regional Water Quality Control Board (RWQCB). Ephemeral drainages flow following precipitation events during the wet season. These features convey water from vertical precipitation and as topographic depressions within valley systems and gather water from upland areas via sheet flow. On the project site, ephemeral drainages located in the northern half of the Property generally flow south-to-north before entering a west-to-east intermittent creek (Watercourse II) that makes up the northern project boundary. Ephemeral drainages in the southern half of the Property generally flow north-to-south before entering culverts beneath High Valley Road. These features would likely be categorized as Watercourse III per the Lake County Code of Ordinances, the California FPR and the RWQCB.

Due to the ephemeral nature and seasonality of the drainages on the Property, the plant species composition within these features was comprised of a mix of hydrophytic and upland species consistent with the surrounding non-native annual grassland communities. During the dry summer months, upland species such as Indian milkweed and wild oat inhabit the drainages, while emergent and hydrophytic species are dominant during the wet season. Several wetland plant species were still present or identifiable in the drainages during the September 2020 surveys, including rushes (*Juncus* spp.), Italian ryegrass (*Festuca perennis*), purple sand spurrey (*Spergularia rubra*), and willowherb (*Epilobium ciliatum*). Additionally, many of the ephemeral drainages within the Property were altered by erosion and cattle, allowing for species characteristic of disturbed areas, such as Fitch's tarplant (*Centromadia fitchii*) and yellow star thistle, to become established.

Wildlife species observed within the ephemeral drainages on the project site were consistent with those seen in the surrounding upland habitats. Ground squirrels and their burrows were noted along the banks of many of the drainages and were providing refuge habitat for other wildlife species, such as western fence lizard and pacific gopher snake, which were both observed.

Intermittent Creek

One intermittent drainage occurs on the northeast most parcel of the project property but not on the lot of record, nor within 200 feet of the lot of record, where cannabis cultivation is proposed.

Pond

One perennial, freshwater 0.35-acre pond is present in the lot of record where cannabis cultivation is proposed. This feature is defined as a Class I Watercourse, per the aforementioned ordinances. The pond contained water during the September 2020 surveys and supported dense stands of hydrophytic and emergent vegetation, such as cattails (*Typha latifolia*), rushes, spikerush (*Eleocharis macrostaycha*), rabbit's-foot grass (*Polypogon monspeliensis*), and cocklebur (*Xanthium strumarium*), along its edge.

c) A description of the watershed in which the permitted activity is located. A map shall be provided showing the full watershed;

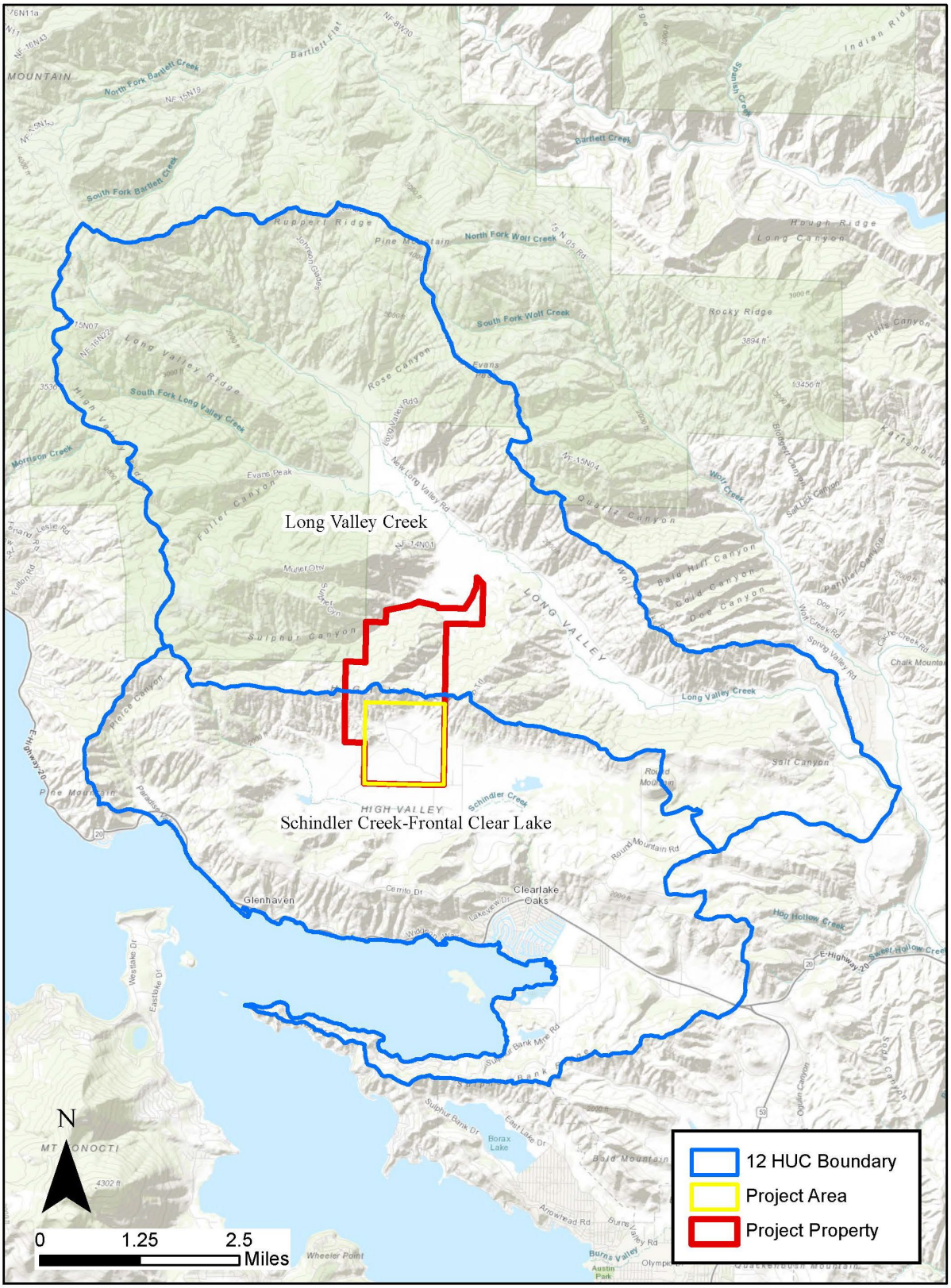
Mapped limits of potential jurisdictional features are provided below in Figure 7-2 and Figure 7-3 below. Setbacks from these features are illustrated on plan set located in Appendix B on Sheet C3.0 labeled Proposed Site Plan. The bed, bank, and channel of the ephemeral and intermittent drainages within the Property may be subject to CDFW jurisdiction under Section 1600 of CFGC; while riparian habitat was not observed on the Property, the extent of riparian vegetation surrounding these features would also be subject to CDFW jurisdiction if found. These features may also be considered waters of the state by the RWQCB/SWQCB, pursuant to the CWA. There are ephemeral drainage features located within the parcel slated for cannabis production; however, no cannabis cultivation or work would occur within 100 feet of these watercourses. If the project were to require work in or near potentially jurisdictional features, authorization from the CDFW and RWQCB/SWQCB will be required. Additionally, as mentioned above, the SWQCB requires watercourse setbacks to be implemented for cannabis production projects and these setback requirements are reflected in the site plan.

Further, if the project would require discharge or dredge or fill material within jurisdictional waters, the project applicant would obtain the appropriate Porter-Cologne Waste Discharge Requirement approval from the RWQCB.

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

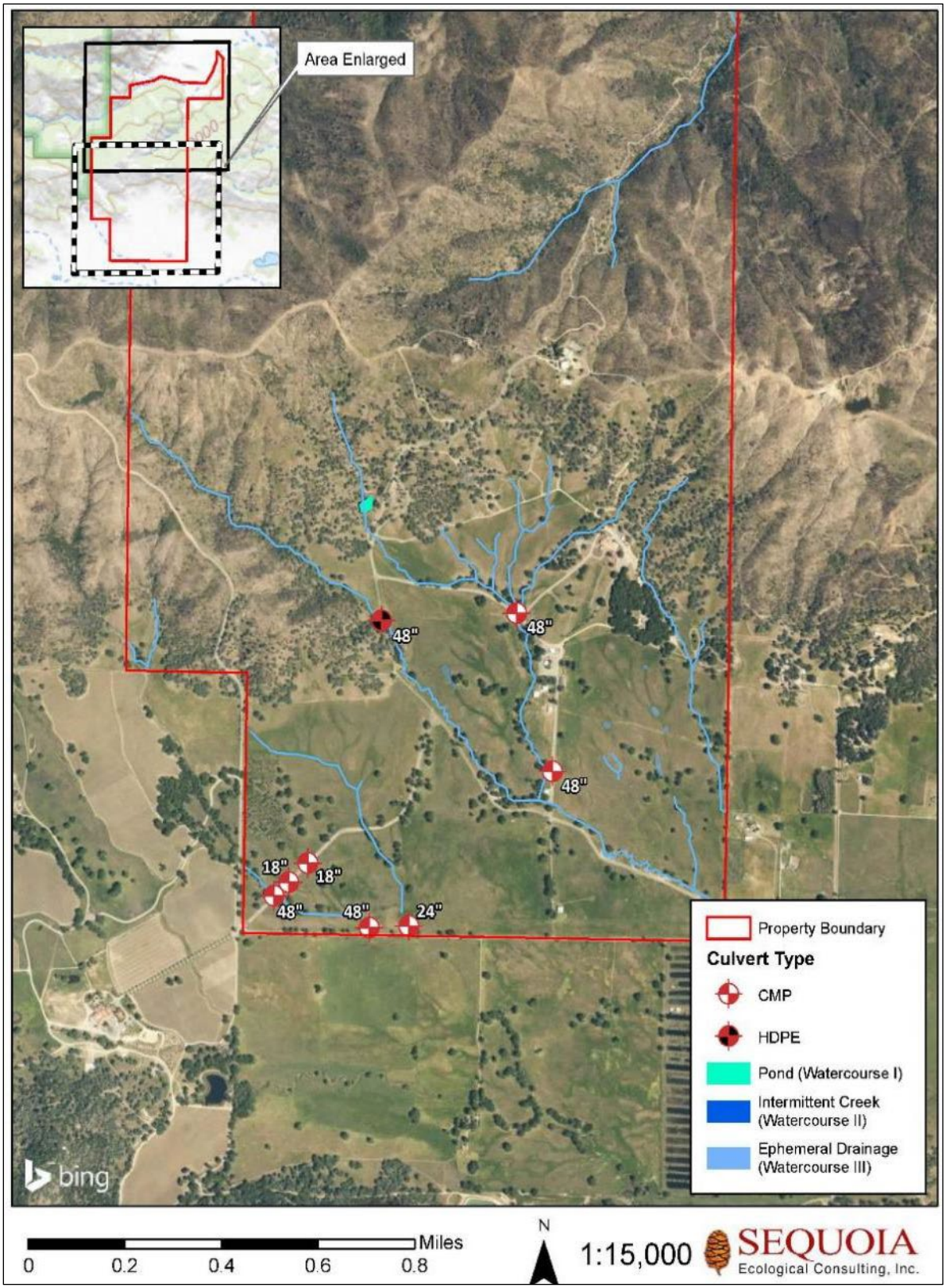
The project site does not fall within the coverage area of any adopted conservation easements. Active construction may temporarily interfere with the movement of native wildlife within this wildlife corridor; however, no permanent dispersal or migration barriers will occur as a result of the proposed project. Fencing would be used around the individual cultivation areas but unfenced corridors between the areas would enable wildlife movement through the site. Cannabis cultivation and related disturbances are limited to the canopy areas, therefore leaving most of the project site as open space available for wildlife movement. In addition, the proposed project will have no adverse effects to fish movement in ephemeral and intermittent drainages, as these features do not provide suitable habitat to support fish.

Figure 7-2, 12-digit Hydrologic Unit Watershed Map



Source: Kimley-Horn, California GIS Open Data Portal, & ESRI, 2020.

Figure 7-3, Potentially Jurisdictional Aquatic Features on the Project Site



Source: Sequoia Ecological Consulting, Inc., 2020

8. OPERATIONS MANUAL

Intent: To describe the operating procedures of the commercial cannabis cultivation site to ensure compliance with all permits, 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 see 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;

The project applicant authorizes the County of Lake, its agents, and employees, to seek verification of the information contained within the Use Permit Applications package, the Operations Manual, and the Operating Standards for the proposed cannabis cultivation operation at 11650 High Valley Road at any time before or after Use Permits are issued. All information contained in the Use Permit applications package is currently available for viewing; and will remain viewable in a physical and digital format given to the County of Lake and its agents/employees; copies will be maintained at the project site.

b) A description of the staff screening processes;

All permit holder(s) and employees will undergo a background check by the Lake County Sheriff Department. An individual may fail the background check if employee has been convicted of an offense that is substantially related to the qualifications, functions, or duties of the business or profession for which the application is made, except that if the sheriff determines that the applicant or permittee is otherwise suitable to be issued a license and granting the license would not compromise public safety, the sheriff shall conduct a thorough review of the nature of the crime, conviction, circumstances, and evidence of rehabilitation of the applicant, and shall evaluate the suitability of the applicant or permittee be issued a license based on the evidence found through the review. In determining which offenses are substantially related to the qualifications, functions, or duties of the business or profession for which the application is made, the sheriff shall include, but not be limited to, the conditions described in Section 26057 of the California Business and Professions Code.

1. All persons employed by the applicant must be at least 21 years of age.
2. All persons employed by the applicant shall undergo a background check by the Lake County Sheriff Department.
3. All agents, officers, or other persons acting for or employed by a licensee shall display a laminated or plastic - coated identification badge issued by the licensee at all times while engaging in commercial cannabis activity.
4. All employees will be properly on boarded by the HR team. The on boarding process includes adding the employee to the HR payroll software at which time, the following tasks will be performed:

   a. The software will generate and assign a random and unique employee number for each employee. This employee number will never be reused and will be retired at the time of employment termination from the company.

b. HR will assign a job title and job description. This will allow assignment to a role in the control access group.

c. HR will create a NFC card that will also be used as the employee badge and will meet the following requirements.

i. The identification badge shall, at a minimum, include the licensee's "doing business as" name and license number, the employee's first name, an employee number exclusively assigned to that employee for identification purposes, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height.

In addition to the required background check by the Lake County Sheriff's Department, all potential employees will be put through an interviewing process and evaluated by management. Additionally, all employees will undergo a sheriff live-scan before being hired.

c) The hours and days of the week when the facility will be open;

Main operating/business hours for High Valley Ranch commercial cannabis operations are from 7am to 9pm, Monday through Sunday. At least one staff member will be onsite twenty-four (24) hours a day and seven (7) days a week for security purposes throughout the cultivation season, from approximately mid-March to November 1. The proposed cultivation operation will be closed to the public.

d) Description of measures taken to minimize or offset the carbon footprint from operational activities;

All proposed cannabis cultivation would occur outdoors and would sequester carbon naturally. Equipment necessary for cultivation operations that require grid power or fossil fuels will be regularly maintained to assure efficient energy usage and will adhere to all applicable emissions standards. This would reduce the project's demands on energy resources that generate emissions. Further, water efficiency systems, such as timed drip irrigation with rain detection will be implemented to reduce water consumption throughout the site and during wet weather events. Eco-friendly packaging material will be used for bulk packaging of cannabis materials and reuse, reduce, and recycle practices will be implemented for all processes on site

e) Description of chemicals stored, used and any effluent discharged as a result of operational activities;

Chemicals stored, used, and discharged as a result of operational activities would include chemicals derived from soaps, hydrogen peroxide, gasoline, diesel. No effluent will be discharged on the project property. The proposed cannabis cultivation operation would include the use of exclusively organic pesticides including: Syl-Coat, Regalia CG, Venerate CG, Grandevo CG, Bio-Tam, Xentari DF, AzaGuard, Dipel DF, PureSpray Green, Trigger. These substances are not known to be classified as hazardous wastes under RCRA.

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:

i. 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.

All equipment will be stored in its proper designated area upon completion of the task for which the equipment was needed. Project personnel will conduct daily scans of the site to ensure that all materials used during the workday have been returned to their designated storage area in an organized manner.

Any refuse created during the workday will be placed in the proper waste disposal receptacle upon completion of the task assigned, or before the end of employee shift. Any refuse which poses a risk for contamination or personal injury shall be disposed of immediately.

Further, weeds and grasses within the project will be maintained regularly to ensure safe and sanitary working conditions and minimize areas for pests.

ii. 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.

High Valley road is the only access road to the site. As part of the project the driveway approach would be improved to Caltrans standards for a commercial driveway. The gate would be setback from the roadway no less than 30 feet, would be 14 feet wide, and would provide a rapid entry lock for emergency services. All interior staging areas, yards, and parking areas will be maintained regularly to fill potholes, reduce dust, and avoid potential soil-borne contamination, reduce harborage of pests, and maintain the cleanliness of the facility. Further, the project will provide 60 standard parking spaces and five Americans with Disabilities Act (ADA) compliant parking spaces on site; see **Table 8-1: High Valley Ranch Parking Summary**. Additionally, ADA compliant access ramps will be installed to provide access throughout the site, as appropriate.

Table 8-1: High Valley Ranch Parking Summary

	Required	Provided
Standard	60	60
Accessible (ADA)	3	5
Total	**63**	**65**

iii. 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.

Soils within the project area are well drained and do not have drainage issues that would result in contamination by seepage, foot-borne filth, or breeding of pests due to unsanitary conditions.

iv. 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.

A portable toilet and handwashing station will be established in reasonable proximity to the proposed cultivation area and will be the primary restroom used by employees. The American with Disabilities Act (ADA) compliant facilities will be serviced regularly to maintain sanitary conditions for operations personnel, and will be available at all times during the cultivation season for use. In addition, the existing residence on the project parcel contains bathroom facilities and a septic system.

The project site also has an existing onsite wastewater treatment system (OWTS) in the existing conference building. Employees may use this facility, but use would be less than the portable facilities. The Applicant will coordinate with Lake County Environmental Health Department to ensure the facilities are located and maintained per Lake County technical standards by a qualified professional. The existing OWTS comply with requirements and a site evaluation will be conducted to ensure compliance with all requirements. Copies of the septic permits have been provided to County and the applicant will allow the OWTS to be inspected as needed, and it will be maintained by a qualified professional as required. No pit - privy or other unpermitted domestic or commercial sewage systems shall be used on the project site.

9. 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.

The proposed cannabis cultivation operation would use exclusively organic pesticides including Diatomaceous Earth, Sulfur, and Method 1. The project will only use pesticides approved by the California Department of Food and Agriculture (CDFA) and the California Department of Pesticide Regulation (CDPR) for use on cannabis plants. The project will only apply pesticides at a rate consistent with pesticide label directions and will adhere to all State and County pesticide use reporting requirements.

Cultivators would be required to comply with Sections 8313(e) and (f) of the proposed regulations, which require compliance with pesticide laws and regulations (including those related to herbicides) as enforced by CDPR, and for any herbicides exempt from registration requirements, licensees must comply with all herbicide label directions, store chemicals in a secure building or shed, contain any chemical leaks and immediately clean up any spills, apply the minimum amount of product necessary to control the target pest (in this case a plant), and prevent off-site drift. This should minimize the potential for hazardous materials or pesticides to pollute waterbodies or affect aquatic species.

b) Complying with all pesticide label directions

All pesticide product labels will be followed, including precautionary statements for protecting human and environmental health, storage and disposal statements, and directions for use. By law, all pesticide applicators must follow these statements.

c) Storing chemicals in a secure building or shed to prevent access by wildlife;

When not in use, all pesticides will be stored under cover and in compliance with label instructions, within a secure pesticide materials storage shed and more than 100 feet from the nearest surface water body.

d) Containing any chemical leaks and immediately clean up any spills;

e) All pesticides will be stored in their manufacturer's original containers/packaging, within a designated storage shed to prevent possible exposure to the environment. All containers will be under 50 gallons and absorbent materials designed for spill containment and spill cleanup equipment will be maintained within the pesticide materials storage area and adjacent to the pesticide mixing/preparation area, for use in the event of an accidental spill. If there is a spill or accidental discharge to any waters of the site, personnel will immediately notify the Office of Emergency Services. Preventing offsite drift;

No pesticides will be applied during windy days or within 100 feet of a water body. Pesticides will only be

applied when wind is blowing away from surface water bodies on site.

f) Not applying pesticides when pollinators are present;

The project will plan pesticide application schedules to protect honeybees and other pollinators within the project property.

g) Not allowing drift to flowering plants attractive to pollinators;

Pesticides will not be applied or allowed to drift onto flowering plants and pollinators during periods when pollinators are present around the proposed cultivation area.

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;

All pesticides will be prepared at least 100 feet from surface water resources and neighboring properties and will not be applied or allowed to drift offsite. No pesticides will be applied within 48 hours of a predicted rainfall event greater than 0.25 inches (requirement of the State Water Resource Control Board's Cannabis General Order) and the operator will not allow any no pesticides to contact any standing water or water resources inside.

j) Using only properly labeled pesticides;

The proposed cannabis cultivation operation will only use pesticides that are properly labeled and authorized by CDFA for use on cannabis.

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 or 7.79 feet on the Rumsey Gauge.

All pesticides will be prepared at least 100 feet from surface water resources and neighboring properties and will not be applied or allowed to drift offsite. No pesticides will be applied within 48 hours of a predicted rainfall event greater than 0.25 inches (requirement of the State Water Resource Control Board's Cannabis General Order).

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 or 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.

Refer to Figure 1-1, Project Site Plan. Waters on site were identified with a preliminary hydrologic analysis by a professional geologist. The site plan shows 100-foot setbacks from all waters identified on the lot of record where no work or pesticide application will occur. Pesticide will be stored in the existing barn on site which is more than 100 feet from water on the lot of record. All storage containers would be less than 50 gallons.

10. 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:

The proposed project includes a robust security protocol to promote both the safety and security of employees but also to secure cannabis products and equipment. The proposed project would include the following safety features:

Description of fences:

Fences with commercial grade locks and gated access points will be provided around the cannabis canopy area to prevent access to the site by unauthorized personnel. The only point of entry into canopy space will be the access gate which will remain locked at all times. The cultivation site will be screened from public view by topographic barriers.

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);

In addition to fences surrounding the project area, the entrance to the project property will be gated and have a commercial lock to prevent access to the site by unauthorized automobiles. Gates will be closed and locked outside of operating hours. The access gate will have a minimum width of 14 feet to provide access for emergency vehicles.

Installing a security alarm system to notify and record incident(s) where physical barriers have been breached;

Security cameras will be installed by all entrance gates and will have the capability to notify and record incidents in which the barriers have been breached. Motion-sensing alarms will be installed at all gates and entrances to buildings on the project parcel, to alert personnel when someone has entered the premises; refer to Figure 1-1. The entire security system shall be managed by a centralized security station, located within an existing structure on site.

Video surveillance

The owner will use a closed circuit-television (CCTV) system with a minimum camera resolution of 1080P to record activities at all sensitive area. In any lighting conditions, 24 hours a day and minimum of 30 frames per second. The CCTV system will feed into a monitoring and recording station in the onsite residential/office building. The CCTV system will be capable of supporting remote access and will be equipped with a failure notification system that immediately notifies

managerial staff of any interruptions or failures. Areas that will be covered by the CCTV system include entry ways to the property, cultivation areas, and shop/drying facility.

Establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors;

A sign-in/sign-out book will be maintained for any personnel, suppliers or visitors to the project property. This book will require the name, company, purpose, time-in and time-out of the attendance event. All records will be kept a minimum of 90 days, and 7 years for any corresponding reported incidents caught on tape.

Maintaining the premises such that visibility and security monitoring of the premises is possible;

The project property will be maintained to ensure visibility and security monitoring of the project area and cultivation sites. A 100-foot defensible space (vegetation management) shall be established and maintained around the propose cultivation operation for fire protection and to provide for visibility and security monitoring.

Establishing procedures for the investigation of suspicious activities:

Upon discovery of suspicious activities, the incident will be referred to the appropriate law enforcement agency for investigation.

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;

Management will maintain an inventory log to track cannabis products on the property throughout the cultivation process. This accounting system will be made available to relevant local and state agencies who wish to review the documentation.

Limiting access of personnel within the premises to those areas necessary to complete job duties, and to those timeframes specifically scheduled for completion of job duties;

A total of 30 to 40 employees will be employed full-time for 22 weeks of the year. During peak harvesting season, a maximum of 65 employees will be present on site. Only verified employees will have access to the project area. Any vendor that comes on site will be accompanied by an employee for the duration of their duties/deliveries/tasks within the cultivation premises. Access to the site will be restricted to standard working hours.

Supervising tasks or processes with high potential for diversion (including the loading and unloading of cannabis transportation vehicles);

All tasks that pose a threat for diversion will be supervised by management staff on site.

Providing designated areas in which personnel may store and access personal items.

Personnel will have a designated storage area within the existing structures on site to 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.

Name: Elli Hagoel, Phone #: (707) 413-4070, Email: ellihagoel@gmail.com

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.

Upon receipt of complaint, it will be recorded in the complaint log, located on the property and immediately responded to. All complaints will be added to an annual report.

Emergency contact information will be kept 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.

d) A description of the required video surveillance.

The project will have a complete video surveillance system with a minimum camera resolution of 1080 pixels, capable of recording surveillance areas in all lighting conditions. Live surveillance streams will be available to authorized users in remote locations via internet.

The proposed security system will record footage at the following locations:

- Perimeter of cultivation site
- Areas where cannabis is weighed, stored, packed, quarantined, loaded/unloaded, prepared or moved within the premises – Area between drying rooms and entrance
- Areas where we are destroying cannabis
- Limited access areas including canopy area, storage sheds, and house
- Security room in house
- Entrance to house where the system storage devices are located
- Interior and exterior of all site access points

The video surveillance system will have the capability to digitally record activity 24 hours a day with a minimum of 30 frames per second. All cameras will be color-capable, exterior cameras will be waterproof and interior cameras will be moisture proof. Video software will also be capable of integration with alarm doors and the proposed security system. Thermal technology will be used for perimeter fencing and cameras will include motion sensors that activate upon detection of motion

All security footage recordings will be located in a secure room, separate from computer and monitoring equipment. All recordings will display the date in an area that will not obstruct view of picture. Recording will be kept on device for at least 30 days and will be made available to the County for inspection as requested.

e) A description of the required fences.

The project area will be enclosed by a fence with a terminal post at every access point and corner and regular 't' posts in between. No barbed/razor or similar design features will be used. The cultivation site will be screened from public view by topographic barriers.

11. STORMWATER 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.

The cultivation operation will include a drip irrigation system to ensure targeted and efficient use of water on site. Therefore, the project would result in minimal runoff. The project would require construction of 10 drying sheds and one cold storage shed that would require foundation preparation on site. This site disturbance could lead to potential erosion from construction. However, the project would implement tracking control, wind-erosion control, non-stormwater management control, and waste management and pollution control best management practices (BMPs) to reduce potential impacts:

- Avoid Vegetation Removal – The area that is currently proposed for cannabis cultivation is already free of vegetation and has been regularly disked for prior agricultural operations. The project would avoid removal of existing trees and vegetation
- Water Conservation Practices – Project operations would implement water conservation measures including efficient irrigation systems and regular leak checks to reduce or eliminate non-stormwater discharges.
- Material Delivery and Storage – To prevent accidental discharge of pollutants from material delivery and storage, all materials will be stored in manufacturers original packaging within a designated storage shed on site.
- Material Use – All employees on site will be trained to properly prepare, apply, and dispose of all pesticides and fertilizers used for the proposed cannabis cultivation operations.
- Stabilized Entrance – Access roads and parking areas are currently paved and so no gravel stabilization is proposed. However, these surfaces would be kept clean to prevent tracking of dirt from vehicle traffic due to personnel entering and existing the parking area.

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.

The proposed cultivation operation applied for coverage under the SWRCB General Order for Cannabis Cultivation Activities on September 29, 2020 and was classified as a 'Tier 2 Low Risk' activity. The applicant will comply with all requirements of the Cannabis General Order to protect water resources. See Attachment C, Notice of Receipt.

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.

Refer to Figure 1-1 for proposed location of cannabis cultivation and setbacks from water resources. No cultivation operations are located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

d) 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.

By implementing the Best Practicable Treatment and Control (BPTC) measures defined in the SWRCB General Order, there will be no illicit discharges of irrigation or storm water from the premises.

e) Identify 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.

As discussed above, the proposed drip irrigation system would result in limited irrigation runoff and implementation of stormwater BMPs would further reduce runoff from the site. The proposed project does not discharge stormwater into any Lake County maintained drainage or conveyance system.

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.

The proposed project does not have a stormwater discharge point; no downstream roads or bridges will be affected by the cultivation operations.

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.

No offsite stormwater discharge will occur as a result of the cultivation operations. Stormwater management BMPs will be implemented to ensure that stormwater runoff is managed on-site and will not increase the volume of water that historically has flowed onto adjacent properties.

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

There is no stormwater discharge point within the project operations; all stormwater discharge will be contained within the project property.

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

The stormwater management measures proposed by the project will meet the requirements of the Lake County Storm Water Management Ordinance (Chapter 29 of the Lake County Ordinance Code).

j) Describe the proposed grading of the property.

There is no proposed grading for the cannabis cultivation operations. Construction of the cannabis drying sheds would require site preparation for foundations, however, the site would be balanced and no soil import or export would be required.

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;

Construction-related BMPs are provided under section 11.0 (a) above.

Further, the proposed cannabis cultivation operation will implement and maintain an irrigation system for the lifetime of its operation permit. The system will be monitored daily to ensure minimum run-off.

The operation will incorporate the following BMPs for stormwater management:

1. Adhere to Lake County Planning Department waterway and creek setback requirements, as shown in the Site Plan
2. Stabilize unpaved site entrance and temporary driveways with 3" crushed rock up to 50' in length to prevent tracking soil from site
3. Cover all stockpiles and landscape materials; keep behind silt fence, and away from water bodies
4. Use pea-gravel bags around drain-inlets on-site and downstream of cannabis cultivation areas
5. Place porta-potty near stabilized site entrance and away from storm drain inlets and water bodies
6. Cover all exposed soil with straw or straw with tackifier

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

The proposed project must comply with the following SWRCB Monitoring and Reporting Requirements for cannabis cultivation operations:

- Winterization Measures Implementation
- Tier Status Confirmation
- Third Party Identification (if applicable)
- Nitrogen Application (Monthly and Total Annual)

An Annual Report shall be submitted to the Central Valley Regional Water Quality Control Board (CVRWQCB) by March 1st of each year. The Annual Report shall include the following:

1. Facility Status, Site Maintenance Status, and Storm Water Runoff Monitoring.
2. The name and contact information of the person responsible for operation, maintenance, and monitoring.
3. A summary of the numbers and severity of waste discharge violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations.

The project will follow all monitoring requirements to maintain compliance with SWRCB Statewide General Order for cannabis waste discharge; these monitoring reports will be provided to Lake County officials upon request.

12. WASTE MANAGEMENT

12.1. Solid Waste Management

a) 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:

Table 12.1-1: Solid Waste Generation

Solid Waste Type	Peak Season Daily	Annual
Paper	1	100
Glass	0.2	10
Metal	0.2	10
Electronics	0.2	10
Plastic	1	100
Organics	composted	composted
Inerts	N/A	N/A
Household hazardous waste	N/A	N/A
Special Waste	0.4	20
Mixed residue	0.2	10
Total	**3.2**	**260**

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

The project will minimize solid waste generation, by packaging our product in off-site facility. All solid waste produced on site will be collected daily and be separated for landfill, recycling, or compost. Solid waste will be temporarily stored on site prior to weekly disposal at appropriate facilities by South Lake Refuse and Recycling. The project will prioritize the purchasing of materials in reusable, eco-friendly, compostable, and/or recyclable packaging when possible; reuse and recycle materials as much as possible to divert waste from landfills and designate multiple recyclable materials collection receptacles on the project property.

c) Describe the waste collection frequency and method.

High Valley Ranch will contract for collection of solid waste on a weekly basis, and recyclable materials removal every other week by a permitted solid waste/recycling facility. High Valley Ranch's preferred permitted solid waste/recycling provider is South Lake Refuse and Recycling. High Valley Ranch's contract for recycling and solid waste removal services will be arranged in accordance with state or local laws or requirements, including a local ordinance or agreement, applicable to the collection, handling, or recycling

of solid waste, to the extent that these services are offered and reasonably available from a local service provider.

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

Solid waste produced on site will be handled and stored in a manner that prevents vectors, health and safety threats and nuisances, as well as litter and water contamination. High Valley Ranch will source separate recyclable materials from solid waste and subscribe to a basic level of recycling service that includes collection, self-hauling, or other arrangements for the pickup of the recyclable materials. High Valley Ranch will obtain appropriate waste containers from the waste service provider and all waste and recyclable material storage receptacles will receive frequent maintenance to ensure they are kept in a clean and sanitary condition.

Solid waste will be stored in suitable watertight containers with tight fitting lids and all waste containers stored outside will be covered. Materials intended for recycling will be stored in a clean and sanitary manner separate from solid waste; and as previously stated, all cannabis waste will be managed, stored, and handled separately from all other waste streams generated by Amelia Street Ventures. Amelia Street Ventures will store solid waste and recyclable material in the secured waste storage area on the licensed premises, as indicated in project site plan.

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

Solid waste collected by South Lake Refuse and Recycling will be appropriately disposed of at the following facilities[1]:

- East Lake Landfill – 16015 Davis Street, Clearlake, CA 95422,
- South Lake Recycling Center – 16015 Davis Street, Clearlake, CA 95422, and
- Quackenbush Mountain Compost Facility – 16520 Davis Street, Clearlake, CA 95422.

12.2. Hazardous Waste Management

Hazard Analysis

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. No Hazardous Wastes will be generated from the proposed cultivation operation.

The proposed project would not use acutely hazardous waste (including industrial waste). All potentially hazardous materials, including commonly used materials as part of agricultural operations including fuels, greases, lubricants, pesticides, and fertilizer will be stored, handled, and disposed of according to all Hazardous Waste Control and Generator regulations. These types of waste will not be disposed of on-site without review or permits from EHD, the SWRCB, and/or the Air Quality Board. Locally, the proposed project would be required to, and be subject to verification by the Lake County Division of Environmental Health (LCDEH), which acts as the Certified Unified Program Agency (CUPA) for all of Lake County. If any

[1] South Lake Refuse and Recycling, 2020. Retrieved from http://www.southlakerefuse.com/.

leftover or waste products from the materials listed above remain, they will be recycled or disposed of through a registered waste hauler waste hauler to an approved site legally authorized to accept such material.

a) 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:

i. Biological hazards, including microbiological hazards;

Potential biological hazards for the cannabis flower products produced at commercial cannabis operations include those molds and bacteria tested for in Phase 3 State of CA cannabis testing assays: Aspergillus flavus, Aspergillus fumigatus, Aspergillus niger, Aspergilus terreus, shiga toxin-producing E. coli; and Salmonella spp.

ii. Chemical hazards, including radiological hazards, pesticide(s) contamination, solvent or other residue, natural toxins, decomposition, unapproved additives, or food allergens; and/or

Potential chemical hazards on the project property include gasoline, diesel fuel, oils/lubricants, and disinfecting/cleaning supplies for routine maintenance of equipment and existing structures on site. All equipment will be maintained, stored and operated in a manner that minimizes the potential for any spill or leak of the listed materials. Any spilled materials and/or contaminated soil will be immediately collected stored, transported, and disposed of consistent with applicable local, State and Federal regulations. The proposed cultivation operation would use exclusively organic pesticides that would not pose a chemical hazard on site.

iii. Physical hazards, such as stone, glass, metal fragments, hair or insects.

Physical hazards may product include exposure to unsanitary conditions; exposure to agricultural and processing chemicals; and contamination from foreign materials (insect frass, dust, glass, metal).

b) 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.

If a potential hazard is identified at any point by on-site personnel, an evaluation will be conducted to determine the severity of illness/injury of a given hazard and the probability that the hazard will occur in absence of preventative controls. Biological contaminants may cause an immediate illness requiring medical attention; chemical hazards often have long-term health consequences via repeated exposure events; physical hazards range from unsanitary (insect frass, hair) to injurious (glass or metal fragments) and vary in potential threat to human health depending on concentration or substance. Contamination from the each of the above listed hazards can be prevented by practicing proper safety protocols during operations.

c) The hazard evaluation shall consider the effect of the following on the safety of the finished cannabis product for the intended consumer:

i. The sanitation conditions of the manufacturing premises;

No manufacturing is proposed on the project property.

ii. The product formulation process;

While some cannabis flower will be trimmed on-site, manufacturing and processing will occur off-site.

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

The proposed application does not include manufacturing of cannabis product. After drying on site, cannabis products will be transported by a licensed distributor to a licensed manufacturing facility.

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

The proposed project will not include manufacturing of cannabis product.

v. The operation's transportation and transfer practices;

Shipments of cannabis goods will only be received, and cannabis products will only be prepared for shipment within a designated limited-access shipping and receiving area. Managers will supervise all shipment preparation and receiving activities and maintain security in the designated shipping and receiving space. High Valley Ranch's shipping and receiving area will be secured with the following:

- Access control points, which include the positive identification of all employees and service providers at all points of entry.
- Video surveillance, including of entry and exit points, with enough clarity to allow facial recognition.
- The quantity of each shipment will be tracked with a departure date.

vi. The facility's manufacturing and processing procedures;

The proposed project would include the following cultivation associated activities: drying and refrigeration of cannabis in the cold storage shed and the 10 drying and storage structures. Unsanitary conditions in this facility may present a safety hazard for consumers. This hazard will be avoided through regular sanitation and maintenance of the area.

vii. The facility's packaging and labeling activities;

The proposed application does not include manufacturing or packaging of cannabis product for consumer distribution. Packaging and labelling activities will be done off-site.

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

Components and/or finished cannabis product will be stored off-site.

ix. The intended or reasonably foreseeable use of the finished cannabis product: and

30 percent of the cannabis produced by the project will be sold as cannabis flower and the remaining 70 percent will be sold for oil production.

x. Any other relevant factors.

N/A

Management Plan

a) The Management Plans shall:

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

The project would include routine use of common household chemicals for routine cleaning and maintenance on site. These substances would be stored within the residence on site and would not result in potential hazards. All containers would be under 50 gallons.

The proposed cannabis cultivation operation would include the use of exclusively organic pesticides including: Syl-Coat, Regalia CG, Venerate CG, Grandevo CG, Bio-Tam, Xentari DF, AzaGuard, Dipel DF, PureSpray Green, Trigger. These substances are not known to be classified as hazardous wastes under RCRA.

ii. Identify all containers and container management;

iii. Describe storage locations and chemical segregation procedures;

All pesticides would be stored in their manufacturer's original containers/packaging in an on-site storage shed to prevent possible exposure to the environment. All containers would be under 50 gallons. Absorbent materials designed for spill containment and spill cleanup equipment will be maintained within the materials storage area and adjacent to the preparation area, for use in the event of an accidental spill. Staff will be trained in the proper use of spill containment materials and notification procedures.

The manager will ensure that all chemical products, cleaning alcohols, and any other flammable substances in the Facility will be stored in cabinets with the following attributes:

- Constructed of a double wall 18-gauge welded steel.
- 1 ½" air space to meet NFPA and OSHA standards.
- Leak-proof doors.
- 3-point locking handle.

All packaging and container waste would be stored in solid-waste bins located on site for weekly pick-up by South Lake Refuse and Recycling.

iv. Describe hazardous waste manifest and record keeping protocol;

As discussed above, the project is not expected to produce hazardous wastes on site. Non-hazardous waste, including pesticides, would be stored on-site and supplies would be tracked by personnel in a supply-log after deliveries and pesticide applications.

v. Outline inspection procedures;

vi. Identify emergency spill response procedures;

Absorbent materials designed for spill containment will be used immediately in response to any spill on site. Further, staff will immediately notify appropriate County personnel to determine if actions are needed to protect public safety.

vii. Describe staff responsibilities;

Project staff would be required to maintain accurate logs of pesticide supplies, follow

manufacturers protocol on pesticide use and disposal, and report all accidental spills to management staff.

viii. Describe the staff training program;

High Valley Ranch's Hazard Communication policies and procedures will ensure the proposed project is compliant with applicable Occupational Safety and Health Administration (OSHA) requirements and all applicable state and local laws, regulations, ordinances, and other requirements. All levels of supervision will be held accountable for the safety of those employees under their direction. Copies of High Valley Ranch Hazard Communication policies and procedures will be given to all employees and be available for all to review, upon request.

Hazard Communication policies and procedures will, at a minimum, address the following:

- Informing employees of hazardous chemicals used on site.
- Use of labels and other forms of warning.
- Use of Material Safety Data Sheets (MSDSs).
- Procedure with respect to hazardous non-routine tasks.
- Maintaining a list of known hazardous chemicals used by employees and independent contractors.
- Communication of hazards.
- Training of employees and independent contractors.

ix. **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**

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.

x. 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.

Refer to the plan set located in Section 26 of the application package on Sheet C3.0 labeled Proposed Site Plan.

12.3. Cannabis Vegetative Material Waste Management

The cannabis vegetative material waste management section shall:

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

All vegetative waste will be recycled and composted on site. Thus, no vegetative waste requiring off-site

management or disposal will be generated by project operations.

b) Describe how the permittee will minimize cannabis vegetative waste generation;.

Vegetative waste will be recycled and composted on site.

c) Describe how solid waste will be disposed; and

As discussed in Section 11, solid waste will be collected by South Lake Refuse and Recycling at least every seven (7) days/weekly during the cultivation season.

d) 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.

An estimated 1,050,000 pounds of cannabis vegetative waste would be produced during the first yearly harvest and 1,600,000 pounds during the second harvest, for a total of 2,650,000 pounds of cannabis vegetative waste. All vegetative waste will be composted on site. As waste is collected, it will be chopped using a chipper machine and subsequently mixed with organic material at a 50/50 mix. All compost will be regularly turned and spread throughout the property once or twice annually.

12.4. Growing Medium Management

The growing medium management section shall:

a) 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;

Organic growing medium will not be used on site. Outdoor cultivation activities would plant directly in native soils, therefore, no organic growing medium disposal would be required.

b) Describe how the permittee will minimize growing medium waste generation;

The project will cultivate all cannabis product outdoors and organically. This process will minimize growing medium waste generation.

c) Describe any non-organic content in the growing medium used (such as vermiculite, silica gel, or other non-organic additives;

d) Describe how growing medium waste will be disposed; and

Non-organic growing medium will not be used on site.

e) 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.

Organic growing medium will not be used on site.

13. WATER RESOURCES

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

a) A description of the surface and groundwater resources that are located on the lot of record where the permitted activity is located.

Groundwater Resources

A total of four groundwater wells are located on the cannabis cultivation parcel. Two wells, one existing (Well #4) and a new on-site well are proposed to provide water for the project. If necessary, existing wells may be reconditioned to provide additional water supply or redundancy for the irrigation system.

Ephemeral Drainages

Ephemeral drainages are located on the project site and generally flow north-to-south on the southern portion of the property before entering culverts beneath High Valley Road. The remaining ephemeral drainages on the northern portion of the property flow south-to-north.

Pond

One perennial, freshwater 0.35-acre pond is present in the lot of record where cannabis cultivation is proposed.

b) A description of the watershed in which the permitted activity is located.

The proposed cannabis cultivation operation is located in the Schindler Creek-Frontal Clear Lake watershed which is under the jurisdiction of the Lake County Watershed Protection District.

c) A description of how the permittee will minimize adverse impacts on the surface and groundwater resources.

The proposed project will not disturb any surface or groundwater resources or aquatic habitat on site. The project will maintain existing vegetative cover adjacent to the cannabis canopy area to minimize off-site waste discharge. Access roads and parking areas are paved or graveled to prevent the generation of fugitive dust. Vegetative ground cover will be preserved and/or re-established as soon as possible throughout the entire site to filter and infiltrate stormwater runoff from the access roads, parking areas, and the proposed operations.

The project will include five 10,000-gallon water tanks in the garden and nursery areas for mixing fertilizer into the water supply. In addition, a 40,000-gallon metal or fiberglass water tank will be installed, which will only be used for emergency firefighting. A small two-horsepower pump would be installed with the tank to help with fertilizer mixing. Personnel will minimize adverse impacts on the surface/ground water resources by not applying pesticides or fertilizer within 100-feet of a surface water body or in unfavorable wind conditions and implementing the best practices summarized in Section 6.0 Fertilizer Usage.

The proposed cultivation operation applied for coverage under the SWRCB General Order for Cannabis Cultivation Activities on September 29, 2020 and was classified as a 'Tier 2 Low Risk' activity. The applicant will comply with all requirements of the Cannabis General Order to protect water resources. Per the Water Conservation and Use requirements outlined in the SWRCB's Cannabis General Order, the project will implement the following Best Management Practices (BMPs) / Best Practical Treatment and Control (BPTC) measures to conserve water resources:

- Regularly inspect the entire water delivery system for leaks and immediately repair any leaky faucets, pipes, connectors, or other leaks
- Install float valves on all water storage tanks to keep them from overflowing onto the ground
- Use water conserving irrigation systems/methods, such as drip/trickle and microspray irrigation and hand watering, and never overwater the plants
- Document and maintain daily records of all water used by the proposed cannabis cultivation operation

d) A description of what parameters will be measured and the methodology of how they will be measured.

Table 13-1: Water Measurement

Parameters to Measure	Method
Static level of groundwater well	Static level monitoring device will be installed in well casing that provides continuous data logging of groundwater well water elevation.
Groundwater usage and flow	Irrigation controller will be installed in the water supply line to the project area.
Stormwater events/runoff	Rain gauge and visual inspection/written documentation of Project site after significant weather event (>1/2" rainfall over 24 hours)

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.

Refer to Figure 1-1 and Figure 7-3.

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.

Refer to Figure 1-1, which shows existing topography data available for the site.

14. WATER USE

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

This section shall:

a) Identify the source of water, including location, capacity, and documentation that it is a legal source.

One new well would be drilled and an existing well would provide water for the proposed project and would be located within APN 006-004-070. Well locations are shown on Figure 1-1, Project Site Plan. Existing well capacity has been tested to preliminarily confirm total supply per minute. Well capacity to provide suitable water supply will be reviewed and confirmed following completion of an irrigation plan.

b) Describe the proposed irrigation system and methodology.

The cultivation operation will include a drip irrigation system to ensure targeted and efficient use of water on site. All viable wells will feed individually via mainlines to a main filter station which will then feed directly to each block through mainlines, accompanied by valve control wires. At each block there will be a series of hydraulic/electric valves which will feed manifolds with flex risers connecting to tape installed in each planting bed. All manifolds & tape will be designed around the following criteria: elevations, flows & pressures. All block control valves will be directed by a main irrigation controller for on/off/duration control. All Velocities in mainlines, sub-mains and manifolds will hover around 5 feet/sec.

c) 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.

The proposed project is estimated to require 12 hours of irrigation per plant per week, resulting in approximately 2.2 million gallons a week for 22 weeks a year. Thus, annual usage is estimated to be 48,400,000 gallons for 80 acres of canopy area and 5 acres of nursery area.

According to the Lake County Water Demand Forecast, the commercial, industrial and institutional (CII) water use demand is 78 gallons/day per employee. Assuming a maximum of 65 employees will be onsite for 22 weeks (308 days), the water use demand is approximately 4.79-acre feet per year (1,561,000 gallons per year).

The proposed project would house ten employees onsite through the cultivation season. Employees living onsite would require limited water resources for daily activities including bathing, drinking, and cooking. Onsite water usage was estimated using the Federal Energy Management Program (FEMP) water use indices for dormitories (bunk houses). The FEMP estimates bunk house residents to use an average of 35 gallons per day.[2] Accordingly, onsite residents would use approximately 350 gallons per day, resulting in 2,450 gallons a week for 22 weeks per year. Thus, annual usage is estimated to be 53,900 gallons for ten onsite residents.

d) 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, Division 2, Chapter 27).

[2] https://www.energy.gov/eere/femp/federal-water-use-indices

The final irrigation plan for the proposed project is under development and final calculations of efficiency are not available. However, the proposed irrigation system will incorporate a range of features including a pre-programmable and web-based irrigation system and Variable Frequency Drive for each well to ensure efficient water use. The proposed project will comply with all requirements of the Model Water Efficient Landscape Ordinance and final calculations will be provided to the County upon completion.

e) Describe the methodology that will be used to measure the amount of water used and the required monitoring.

All block control valves will be directed by a main irrigation controller for on/off/duration control. The irrigation controller is pre-programmable & web-based and will also have capacity to control fertigation. Further, each well will have a Variable Frequency Drive with Pressure Transducers. Each well's Drive will be set up with a Master / Slave relationship so that field demands can be efficiently satisfied without the excessive use of power nor system over pressurization

15- WILDFIRE SAFETY

The project property and project site are located within an area designated as a Wildland Fire Hazard Area by Lake County. The Project property is located within the NSFPD and is in a State Responsibility Area (SRA) as mapped by the California Department of Forestry & Fire Protection (Calfire). The Calfire map indicates that the proposed cultivation area is in a Moderate Fire Hazard Severity Zone (MFHSZ), with other portions of the project property to the north where there is thicker vegetation and sloped hilly terrain as a Very High Fire Hazard Severity Zone (VHFHSZ). The slopes within the cultivation areas are very slight and the ground is flat. As discussed above, however, although no cultivation or project related activities are proposed to occur in them, the northern portions of the project property has varied topography with some steeper areas with 20-30 percent slopes.

The proposed project includes installation of new metal sided storage facilities and cultivation related equipment. Consistent with County Policy HS-7.2, the structures would be clustered within an area that is already largely devoid of existing vegetation and is adjacent to other areas that are disked for weed management as well as areas with trees. The areas with the densest vegetation is in an area with known cultural resources. No work is proposed in this area. All cultivation areas and the location of the proposes structures are adjacent to the interior access roadways that could be uses by emergency vehicles and would provide access and required turn-a-round areas. The proposed project includes water tanks that would be used for cultivation but could be used in case of emergency. The proposed project also would provide a dedicated 40,000-gallon steel of fiberglass water tank(s) for fire suppression needs. The tank would be located to ensure protection of structures and pursuant to all requirements and standards of National Fire Protection Act 1142.

The proposed project does not include any new residential units and would not increase the population in the area. To mitigate risk, the proposed project would cluster development in an area with least existing wildfire risk, would take on maintenance and abatement activities to minimize fuel buildup, maintain 100 feet of defensible space, and access (roadway widths and turn arounds), and ensuring the water supply is secure and volumes are stored in dedicated tank(s).

The proposed project has been designed and includes measures, and conforms with fire safety requirements, buildings codes and regulations, etc. that ensure consistency with wildfire preventions strategies and includes methodologies ensuring defensible space through vegetation management and that would ensure emergency vehicle access is enabled, emergency water reserves can reach. The proposed project also was designed to be consistent with emergency management and potential for evacuations.

a) Compliance with Emergency Plans or Emergency Evacuation Plan

The Lake County Emergency Operations Plan was adopted in 2018 and a more recent Draft Plan was circulated in July of 2020. The project would not impair or interfere with any provisions of either of the emergency response or evacuation plans. The EOP establishes multi-agency and multijurisdictional coordination during emergency operations, assigns functions and tasks consistent with California's Standardized Emergency Management System and the National Incident Management System, and serves as the policy for emergency management in the Operational Area. No aspects of the proposed project would interfere with implementation of, coordination between agencies, or hamper any emergency response on site or in surrounding areas.

Access to the site is taken from a short private drive that intersects with High Valley Road at the southern project property. This access would be improved as part of the project to comply with Caltrans standards.

The gate would be set back from the roadway at least 30 feet and have a width of at least 14 feet, and have a rapid entry lock such as Knox box. The project would meet CBC standards for emergency access as verified by the County Fire Marshall or other approving authority. This would include improving as needed, and then maintenance of access roads with all-weather standards (no mud or standing water), loops and/or turn-a-rounds/or hammerhead T's, and provision of these turnouts or bulb outs every 400 feet. The existing internal roadway is not located in area with greater than 16 percent grade. In addition, the proposed project would implement all design requirements set for in Sections 4290 and 4291 CalFire Standards related to hazardous fire areas. The proposed project would not alter or modify any existing county roads and does not include any uses that would impede the use of SH-29 should it be needed to evacuate nearby areas.

b) Ensure the proposed project does not make exiting fire hazard worse.

The slopes on within the cultivation area minimal and the site is mostly flat. Within the overall project property are more varied and greater than 30 percent in some areas to the north of the cultivation sites. Immediately surrounding the cultivation areas slopes do not exceed 30 percent. With vegetation being largely disked pastureland and few stands of trees. The proposed project would not result in substantial changes to any onsite locations that would increase the dangers of wildfire.

As discussed above, the project proposes to place all new structures in a concentrated area that is largely void of vegetation. The proposed project would use appropriate setbacks and fuel breaks around all structures. Fire buffers also will be used along the interior roadway by thinning, disking, mowing, or other means to reduce potential fire hazards.

All areas of the project that require electricity would be powered by on grid utilities from PG&E. Any lines that are extended are planned to occur within areas proposed for disturbance, away from high fire hazard areas, and would implement all require safety and construction methodologies to minimize activities that result in temporary sparks, open flames, and minimize use of machinery to the extent feasible. Where and if generators are needed to support operations, the generators will be placed on a minimum of a ten-foot radius of non-combustible materials surface, and will have a 3A-40B fire extinguisher within the ten feet.

c) Implement and comply with the Lake County Wildfire Protection Plan

The proposed project would implement the Lake County Wildfire Protection Plan. The fire management on the project site would be done while maintaining a balance between needed fire prevention measures, conservation, and wildlife protection. This fire management on the private project site also will consider integration of community needs and expectations for fore safety. Accordingly, the project applicant will work with adjacent property owners and coordinate, as needed to ensure fire protection strategies across property boundaries are cohesive and neither area would interfere with evacuation planning and preparation.

The proposed project would implement fuel-reduction methods in accordance with the County Wildland Fuel Hazard Reduction planning documentation. The proposed project would incorporate ecological fuel reduction to reduce surface fuels, ladder fuels, and crown density, as applicable, while implementing treatments that work to enhance plant community health and biodiversity. Site specific fuel reductions would take into consideration vegetation, soil types, slope, aspect, ecosystem health needs, and landowner objectives.

Trimmed or thinned material would be disposed of by chipping, composting, or controlled burning in accordance with all safety precautions. The project would not include broadcast burning which allows a controlled fire to burn in the understory throughout a designated area within well-defined boundaries, or patch or patch burning.

SEQUOIA
Ecological Consulting, Inc.

High Valley Ranch Project

Clearlake Oaks, Lake County, California

Biological Resources Report

October 2020

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ATTACHMENTS

1 INTRODUCTION

Sequoia Ecological Consulting, Inc. (Sequoia) has prepared this Biological Resources Report for the proposed High Valley Ranch Project site (hereafter referred to as "the Project site") located at 11650 High Valley Road in Clearlake Oaks, Lake County, California (Figures 1 and 2). Our analysis provides a description of existing biological resources on the Project site and identifies potentially significant impacts that could occur to sensitive biological resources resulting from construction of the proposed Project.

Biological resources include common plant and animal species, and special-status plants and animals as designated by the US Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), National Marine Fisheries Service (NMFS), and other resource organizations, including the California Native Plant Society (CNPS). Biological resources also include waters of the United States and State of California, as regulated by the US Army Corps of Engineers (USACE), California Regional Water Quality Control Board (RWQCB), and CDFW. Please note that this analysis assesses the potential for impacts to regulated waters but does not provide the level of detail required for a formal delineation of "waters of the United States" suitable for submittal to the USACE, the regulatory agency that defines waters of the United States.

In accordance with the California Environmental Quality Act (CEQA) checklist, this Biological Resources Report also provides mitigation measures for "potentially significant" impacts that could occur to biological resources pursuant to CEQA (Pub. Resources Code §§ 21000 et seq.; 14 Cal. Code Regs §§ 15000 et seq). The prescribed mitigation measures would reduce impacts to levels considered "less than significant" pursuant to CEQA. Accordingly, this Biological Resources Report is suitable for review or inclusion in a review by Lake County for the proposed Project pursuant to CEQA.

2 LOCATION AND SETTING

The approximately 1,630-acre Project site is located at 11650 High Valley Road, roughly 2 miles northwest of Clearlake Oaks, a census-designated place in Lake County, California (Figures 1 and 2). The Project site is bordered to the west and south by Hill Valley Road, to the east by Valley Oak Drive, and to the north by Fire Trail at Sulphur Canyon. The Project site currently consists of two residential buildings with associated outbuildings, a community center, two farm buildings, and a barn. The Project site consists of seven parcels: Assessor's Parcel Numbers (APNs) 006-004-07, 006-004-25, 006-004-24, 006-002-04, 006-002-09, 006-004-06, and 006-009-36 (Figure 3). Cannabis cultivation would occur on one of these seven parcels (APN 006-004-07); see Preliminary Site Plan provided as Attachment A. The remaining six parcels exist to meet Lake County requirements to provide 20 acres of land for every 1 acre of cannabis cultivation.

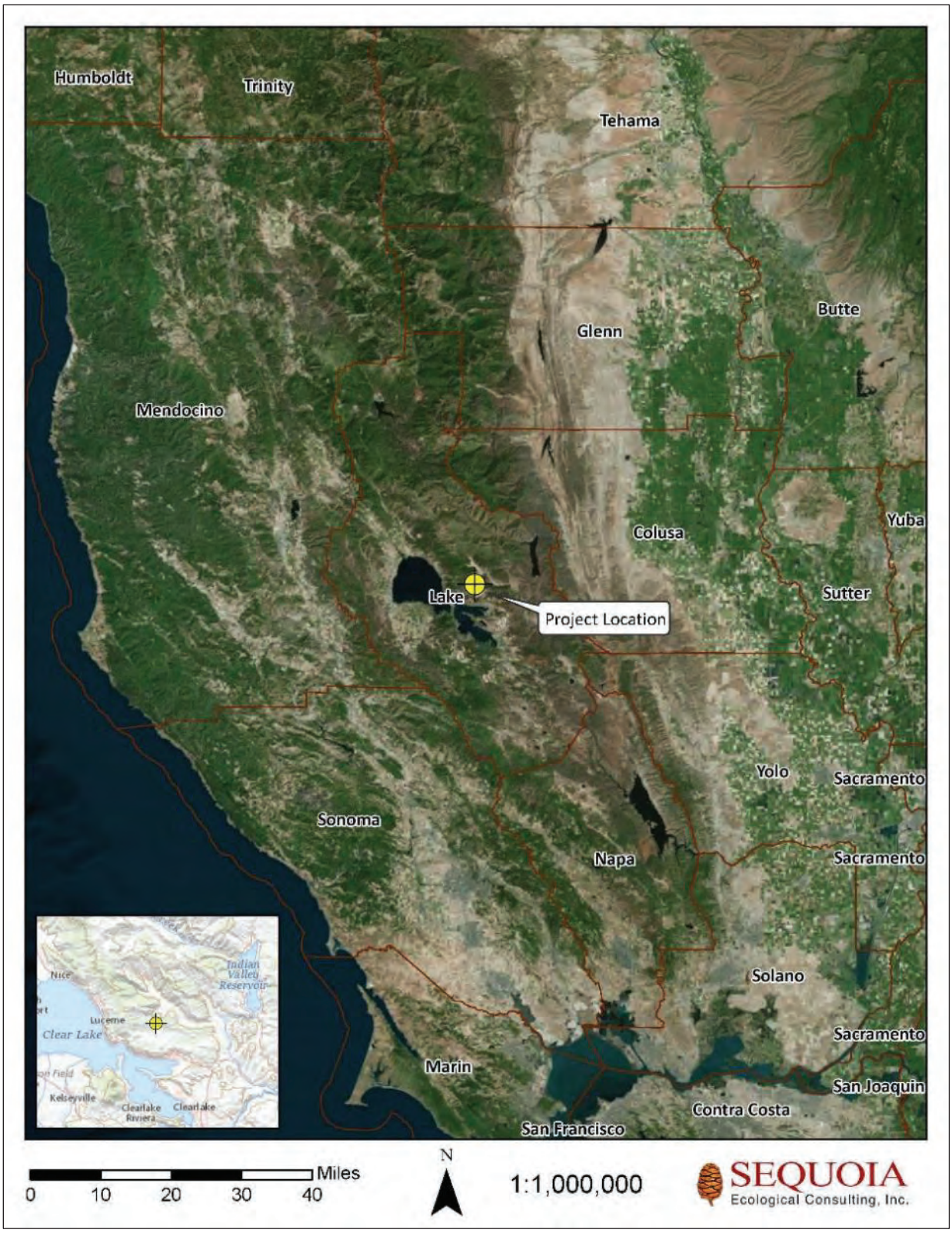

Figure 1. Regional Map of the High Valley Ranch Project Site.

Figure 2. Location Map of the High Valley Ranch Project Site.

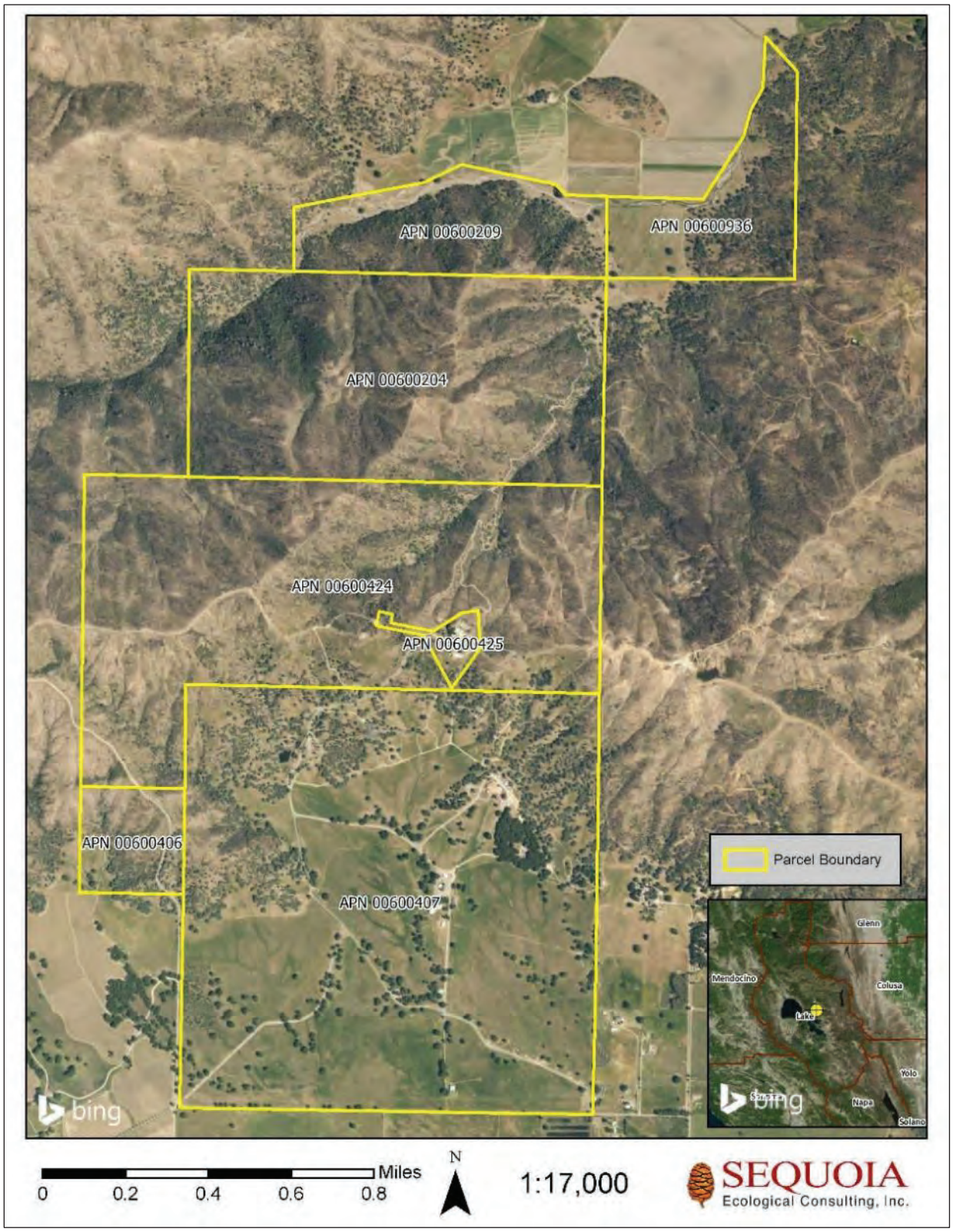

Figure 3. Assessor's Parcel Number Map of the High Valley Ranch Project Site.

3 PROJECT DESCRIPTION

The proposed Project is a cannabis cultivation operation that involves cannabis production areas occurring on APN 006-004-07, including cannabis canopy areas, associated walkways and aisles for access, and a processing facility for trimming, drying, and curing of cannabis plants (Attachment A). The Project would include approximately 80 acres of cannabis canopy in up to six cultivation areas on the southernmost parcel on the Project site. For this analysis, the Study Area is defined as the entire 1,630-acre Property; however, the Preliminary Hydrological Analysis component of the survey focused on the proposed impact areas within APN 006-004-07, as well as a 200-foot buffer around these areas.

Access to the interior of the Project site is provided by existing paved and gravel private roads.

4 REGULATORY SETTING

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies within the land use control and planning authority of local jurisdictions (in this instance, Lake County). Below we provide a summary of these regulatory authorities and a brief discussion on applicability to the proposed Project. More in-depth analyses are provided in Section 6 (Results) and Section 7 (Discussion and Impacts Assessment).

4.1 Federal

4.1.1 Federal Endangered Species Act

The Federal Endangered Species Act (FESA) provides protection for federally listed threatened and endangered species and their habitats. A Project may obtain permission to take federally listed species in one of two ways: a Section 10 Habitat Conservation Plan (HCP) issued to a non-federal entity, or a Section 7 Biological Opinion from the USFWS and/or the National Oceanic and Atmospheric Administration (NOAA) issued to another federal agency that funds or permits an action (e.g., the USACE). Under either Section of the FESA, adverse impacts to protected species are avoided, minimized, and mitigated. Both cases require consultation with the USFWS and/or NMFS, which ultimately issues a Biological Opinion determining whether the federally listed species may be incidentally taken pursuant to the proposed action and authorizing incidental take.

Section 7 of FESA requires that federal agencies develop a conservation program for listed species and that they avoid actions that will jeopardize the continued existence of the species or result in the destruction or adverse modification of the species' designated critical habitat (FESA 7(a)(2)). FESA Section 9 prohibits all persons and agencies from take of threatened and endangered species (though the prohibition on taking listed plants only applies to plants taken from "areas under Federal jurisdiction" or plants taken "in knowing violation of any law or regulation of any State or in the course of any violation of a State criminal trespass law"). Those who violate this mandate face civil and criminal

penalties, including civil fines of up to $25,000 per violation, as well as criminal penalties of up to $50,000 and imprisonment for one year.

Section 10 of FESA regulates a wide range of activities affecting fish and wildlife designated as endangered or threatened and the habitats on which they rely. Section 10 prohibits activities affecting these protected fish and wildlife species and their habitats unless authorized by a permit from USFWS or NMFS. These permits may include incidental take permits, enhancement of survival permits, or recovery and interstate commerce permits. HCPs under Section 10(a)(1)(B) provide for partnerships with non-federal parties to conserve the ecosystems upon which listed species depend.

HCPs are required as part of an application for an incidental take permit under Section 10. They describe the anticipated effects of the proposed take, how those impacts will be minimized or mitigated, and how the HCP will be funded.

4.1.1.1 Applicability to the Proposed Project

FESA gives regulatory authority to USFWS for federally listed terrestrial species and non-anadromous fish. NMFS has regulatory authority over federally listed marine mammals and anadromous fish.

There are no species listed under the FESA that occur on or have the potential to occur on the Project site. Furthermore, the Project site does not fall within USFWS designated critical habitat for any listed species (Figure 4). Therefore, it is anticipated that the proposed Project will not result in any impacts to federally listed species or their habitat protected under the FESA.

4.1.2 Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act (MBTA) (16 USC §§ 703–711), as administered by the USFWS, makes it unlawful to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export at any time, or in any manner, any migratory bird, or any part, nest, or egg of any such bird." This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs.

4.1.2.1 Applicability to the Proposed Project

The Project site provides suitable nesting habitat for common passerine (songbirds) and raptors (birds of prey) species. These birds are protected pursuant to MBTA. Prior to commencement of Project-related activities, a pre-construction survey would be performed, and active nests detected would be provided with an appropriately sized non-disturbance buffer. See Impacts Analysis section below.

4.1.3 US Army Corps of Engineers – Clean Water Act – Section 404

The USACE regulates activities within "waters of the United States" pursuant to congressional acts: Section 404 of the Clean Water Act (CWA; 1977, as amended) and Section 10 of the Rivers and Harbors Act of 1899. Section 404 of the CWA (1977, as amended) requires a permit for discharge of dredged or fill material into waters of the United States. Under Section 404, waters of the United States are defined as all waters that are used currently, or were used in the past, or may be used in the future for interstate or foreign commerce, including waters subject to the ebb and flow of the tide up to the high tide line. Additionally, areas such as wetlands, rivers, and streams (including intermittent streams and tributaries) are considered waters of the United States. The extent of wetlands is determined by examining the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. Under normal circumstances, all three of these parameters must be satisfied for an area to be considered a jurisdictional wetland under Section 404 of the CWA. Fill within wetlands is regulated under the CWA through a Nationwide Permit Program and an Individual Permit Program.

4.1.3.1 Applicability to the Proposed Project

The ephemeral features and artificial pond—which is used for water storage, and farm irrigation, stock watering—on the Project site likely do not fall under USACE jurisdiction pursuant to Section 404 of the CWA (Figures 5 and 6); however, the intermittent creek on the northern property boundary would likely be subject to regulation by USACE. As currently designed, all aquatic features will be avoided and therefore not impacted by proposed Project activities. Accordingly, prior authorization from USACE pursuant to Section 404 of the CWA will not be required for the proposed Project.

4.2 State

4.2.1 California Environmental Quality Act

CEQA requires public agencies in California to analyze and disclose potential environmental impacts associated with a proposed discretionary Project that the agency will carry out, fund, or approve. Any significant impact must be mitigated to the extent feasible, below the threshold of significance.

4.2.1.1 Applicability to the Proposed Project

This document is suitable for use by the CEQA lead agency (Lake County) for preparation of any CEQA review document prepared for the proposed Project. This report has been prepared as a Biology Section suitable for incorporation into an Initial Study or the Biology Section of a Mitigated Negative Declaration or Environmental Impact Report.

4.2.2 California Endangered Species Act

The CDFW is responsible for administering the California Endangered Species Act (CESA). Section 2080 of the California Fish and Wildlife Code prohibits take of any species that the Fish and Wildlife Commission determines to be an endangered species or a threatened species. However, CESA does allow for take that is incidental to otherwise lawful development Projects. Sections 2081(b) and (c) of CESA allow the CDFW to issue an incidental take permit for a state-listed threatened and endangered species only if specific criteria are met (i.e., the effects of the authorized take are minimized and fully mitigated). The measures required to meet this obligation shall be roughly proportional in extent to the impact of the authorized taking on the species. Where various measures are available to meet this obligation, the measures required shall maintain the applicant's objectives to the greatest extent possible. All required measures shall be capable of successful implementation.

4.2.2.1 Applicability to the Proposed Project

No state listed plant species would likely be impacted by the proposed Project (Table 1). As such, the proposed Project should not be required to obtain authorization under CESA.

4.2.3 California Fish and Game Code – Section 1600 – Lake or Streambed Alteration Agreement

The CDFW regulates activities within watercourses, lakes, and in-stream reservoirs. Under Section 1602 of the California Fish and Game Code (CFGC)—often referred to as the Lake or Streambed Alteration Agreement (LSAA)—the CDFW regulates activities that would alter the flow or change or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, or lake. Each of these activities requires a Section 1602 permit. Section 1602 requires CDFW to be notified of any activity that might affect lakes and streams. It also identifies the process through which an applicant can come to an agreement with the state regarding the protection of these resources, both during and following construction.

4.2.3.1 Applicability to the Proposed Project

Impacts to the bed, bank, and/or channel, or associated riparian vegetation of the ephemeral drainages and intermittent creek may be regulated by the CDFW pursuant to Section 1602 of the CFGC. However, as currently designed, these features will be avoided and therefore not impacted by proposed Project activities. Accordingly, a Section 1602 agreement (i.e., LSAA) from CDFW would not be required for the proposed Project.

It should be noted, CDFW requires that cannabis cultivators applying for an Annual License from the California Department of Food and Agriculture have a LSAA or written verification that one is not needed. Alternatively, some cannabis cultivation projects may qualify for a CDFW General Agreement by meeting the following specific requirements:

- The Project needs to involve a stream crossing or water diversion specific to cannabis cultivation.
- The Project must meet the administrative measures, measures to protect fish and wildlife, and reporting requirements highlighted in the General Agreement, Sections H-K.
- The Project cannot be on or in a finfish-bearing stream or lake.
- The Project cannot result in take of a listed or fully protected species.
- The Project cannot be the subject of a complaint by a city attorney, District Attorney, or Attorney General, or an order by a court.

Cannabis cultivation projects that are not eligible for the General Agreement may apply for a Standard LSAA.

4.2.4 California Fish and Game Code – Section 3500 – Nesting Bird Protection

CFGC Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by the CFGC or any regulation made pursuant thereto. CFGC Section 3503.5 protects all birds of prey (raptors) and their eggs and nests. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that elements of a Project (specifically vegetation removal or construction near nest trees) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, which may be subject to approval by the CDFW and/or USFWS.

4.2.5 California Fish and Game Code – Fully Protected Species

CFGC Sections 3505, 3511, 4700, 5050, and 5515 afford full protection to several specific wildlife species. Fully protected species cannot be taken or possessed under state law, even if federal take authorization is issued, except in connection with a Natural Communities Conservation Plan (NCCP) or for the purpose of scientific research and relocation of bird species for the protection of livestock.

4.2.5.1 Applicability to the Proposed Project

The Project site provides suitable habitat for wildlife protected pursuant to CFGC Section 3500 and the MBTA. As such, pre-construction surveys for these species would need to be conducted prior to Project commencement to ensure no direct mortality of these species occurs as a result of the proposed Project.

4.2.6 Regional Water Quality Control Board – Clean Water Act – Section 401 and Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and RWQCB regulate activities in "waters of the State" (which includes wetlands) through two sources of legal authority: Section 401 of the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) (Wat. Code, Div. 7, § 13000 et seq.). The Section 401 water quality certification program allows the state to ensure that activities requiring a federal permit or license comply with state water quality standards. Though similar to Section 404 and 401 requirements, the Porter-Cologne Act applies to all waters of the State rather than to the portions thereof below ordinary high-water mark. "Waters of the State" is defined as any surface water or groundwater, including saline waters, within the boundaries of the state (Water Code § 13050(e)).

The Porter-Cologne Act requires any person discharging waste or proposing to discharge waste in any region that could affect the quality of the waters of the State to file a report of waste discharge. Pursuant to the Porter-Cologne Act, the RWQCB also regulates "isolated wetlands." Functionally, the RWQCB typically evaluates whether an additional waste discharge requirement is necessary for the balance between federal and state jurisdictional boundaries during the 401 certification process. The RWQCB issues a permit or waiver that includes implementing water quality control plans that reflect the beneficial uses to be protected. Waters of the State subject to RWQCB regulation extend to the top of bank, as well as isolated water/wetland features.

On April 2, 2019, the SWRCB adopted Resolution 2019-0015, thereby adopting a document entitled, "State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State" ("Procedures") for inclusion in the Water Quality Control Plans for Inland Surface Waters, Enclosed Bays, and Estuaries of California.

In taking this action, the SWRCB noted that under the Porter-Cologne Act, discharges of dredged or fill material to waters of the State are subject to waste discharge requirements or waivers thereof. The SWRCB further explained that "although the state has historically relied primarily on requirements in the CWA to protect wetlands, US Supreme Court rulings reducing the jurisdiction of the CWA over wetland areas by limiting the definition of 'waters of the United States' have necessitated the use of California's independent authorities under the Porter-Cologne Act to protect these vital resources."

The Office of Administrative Law (OAL) approved the Procedures on August 28, 2019. Pursuant to the Procedures, the effective date is nine months upon OAL approval. Accordingly, the Procedures became effective May 28, 2020.

By adopting the Procedures, the SWRCB mandated and standardized the evaluation of impacts and protection of waters of the State from impacts due to dredge and fill activities. The Procedures include: 1) a wetland definition; 2) a jurisdictional framework for determining if a feature that meets the wetland definition is a water of the state; 3) wetland delineation procedures; and 4) procedures for application submittal, and the review and approval of dredge or fill activities.

The Procedures define an area as a wetland if it meets three criteria: wetland hydrology, wetland soils, and (if vegetated) wetland plants. An area is a wetland if: (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

Waters of the State, by definition, includes more aquatic features than waters of the US, which defines the jurisdiction of the federal government. Waters of the State are not so limited. In addition, the federal definition of a wetland requires a prevalence of wetland vegetation under normal circumstances. To account for wetlands in arid portions of the state, the SWRCB's definition differs from the federal definition in that an area may be a wetland even if it does not support vegetation. If vegetation is present, however, the SWRCB's definition requires that the vegetation be wetland vegetation. The SWRCB's definition clarifies that vegetated and unvegetated wetlands will be regulated in the same manner.

The Procedures also include a jurisdictional framework that applies to aquatic features that meet the wetland definition. The jurisdictional framework will guide applicants and staff in determining whether an aquatic feature that meets the wetland definition will be regulated as a water of the state. The jurisdictional framework is intended to exclude from regulation any artificially-created, temporary features, such as tire ruts or other transient depressions caused by human activity, while still capturing small, naturally-occurring features, such as seasonal wetlands and small vernal pools that may be outside of federal jurisdiction. The Procedures do not expand the SWRCB's jurisdiction beyond areas already under SWRCB's jurisdiction.

The Procedures exclude the following agricultural features from the protections accorded to wetlands: (1) ditches with ephemeral flow that are not a relocated water of the state or excavated in a water of the state; (2) ditches with intermittent flow that are not a relocated water of the state or excavated in a water of the state, or that do not drain wetlands other than any wetlands described in (4) or (5) below; (3) ditches that do not flow, either directly or through another water, into another water of the state; (4) artificially irrigated areas that would revert to dry land should application of waters to that area cease; or (5) artificial, constructed lakes and ponds created in dry land such as farm and stock watering ponds, irrigation ponds, and settling basins.

The Procedures clarify what information and analysis the applicant needs to submit to have a complete application. The Procedures standardize when an alternative analysis needs to be conducted and set a minimum mitigation ratio for any permanent impacts to waters of the State resulting from dredge and fill activities.

When an alternatives analysis is required, the applicant must demonstrate that the proposed alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA). The term practicable means available and capable of being done after taking into consideration cost, existing technology, and other logistics in light of the overall Project purpose.

4.2.6.1 Applicability to the Proposed Project

The ephemeral drainages, pond, and intermittent creek on the Project site likely fall under the RWQCB/SWRCB's jurisdiction pursuant to Section 401 of the CWA (Figures 5 and 6). However, as currently designed, all aquatic features will be avoided and therefore not impacted by proposed Project activities. Accordingly, prior authorization from RWQCB/SWRCB pursuant to Section 401 of the CWA will not be required for the proposed Project.

It should be noted that additional ephemeral features likely considered waters of the State may be present on the Project site, specifically within the agricultural field communities. These communities are routinely disturbed and had been recently disked prior to the September 2020 surveys. Accordingly, due to the absence of vegetation (hydrophytic or otherwise), wetland hydrology, and disturbance of upper soil layers, no potentially jurisdictional waters of the US/state were detected within these areas during the preliminary hydrological analysis performed by Sequoia in September 2020.

To comply with the Porter-Cologne Act, adequate pre- and post-construction Best Management Practices (BMPs) would be planned and incorporated into Project implementation plans to protect downstream waterways. In addition, the Project would develop a Storm Water Pollution Prevention Plan (SWPPP) for submittal to Lake County as a condition of Project approval, demonstrating BMPs that would be installed/implemented prior to Project commencement. Stormwater protection and treatment measures would be implemented to ensure that the proposed Project remains in compliance with the Porter-Cologne Act.

Additionally, the SWQCB requires riparian setbacks for cannabis cultivation projects. Setback distances are determined based on watercourse type and class and are typically implemented from top-of-bank. The SWQCB states that intermittent (Class II) watercourses should have a setback distance of 100 feet, and ephemeral (Class III) watercourses should have a 50-foot setback. In accordance with the SWQCB, any impacts as a result of the proposed Project should not occur within watercourse setback areas.

With implementation of these setbacks and the mitigation measures discussed in Section 3 and listed in the "Impacts Analysis" section below, impacts to waterways can be mitigated to a level considered less than significant pursuant to CEQA.

4.3 Local

4.3.1 Lake County Code of Ordinances

4.3.1.1 Grading Ordinance (Chapter 30)

Chapter 30 (Grading Ordinance) Section 9 (Watercourses and Drainage) of the Lake County Code of Ordinances discusses watercourses and associated setbacks based upon erosion hazard rating, as defined in Appendix A.

Watercourse corridors (Class I-IV) are determined as a function of Erosion Hazard Rating and the watercourse classification outlined in the table below. Lakes that provide fish habitat shall be treated as Class I watercourses for the purposes of this section. Lakes, vernal pools, and wetlands that do not provide fish habitat but do provide habitat for aquatic non-vertebrates or macro-invertebrates shall be treated as Class II watercourses. Lakes, wetlands, and vernal pools providing no habitat for aquatic life shall be treated as Class III watercourses. Corridors are measured outward from the top-of-bank of a watercourse or the high-water mark of a lake, wetland, or vernal pool.

Table A. Lake County Code of Ordinances Watercourse Setbacks.

Watercourse Setbacks (Chapter 30, Section 9, LCCO)				
Erosion Hazard Rating	**Class I**	**Class II**	**Class III**	**Class IV**
Slight	50 ft	50 ft	20 ft	0 ft
Moderate	75 ft	50 ft	35 ft	0 ft
Severe	100 ft	100 ft	50 ft	0 ft

4.3.1.1.1 Applicability to the Proposed Project

In accordance with the Lake County Code of Ordinances, any impacts resulting from the proposed Project should not occur within watercourse setback areas.

4.3.1.2 Cannabis Ordinance 3084 – Tree Protection

Lake County does not have a tree protection ordinance; however, Cannabis Ordinance 3084, Section 4, Subsection iii) Prohibited Activities (a) Tree Removal, Lake County restricts tree removal as follows:

> "The removal of any commercial tree species as defined by the California Code of Regulations Section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak (*Quercus*) species or tan oak (*Notholithocarpus*) species for the purpose of developing a cannabis cultivation site should be avoided and minimized. This shall not include the pruning of any such tree

species for the health of the tree or the removal of such trees, if necessary, for safety or disease concerns."

4.3.1.2.1 Applicability to the Proposed Project

In accordance with the Lake County Code of Ordinances, if any trees are proposed for removal, a tree survey should be conducted, and an arborist report prepared. Lake County may require mitigation for the removal of protected trees; typical mitigation is tree replacement at a ratio of 2:1 or 3:1.

5 METHODS

Sequoia performed a range of desktop and in-field assessments. Using those results, Sequoia employed various site assessments to evaluate the presence of and/or likelihood of occurrence of sensitive resources on the Project site.

5.1 Definitions

5.1.1 Special-Status Species

For the purposes of this document, special-status species include:

- Plant, fish, and wildlife species listed as Threatened or Endangered under FESA (50 CFR 17), and candidates for listing under the statute;
- Species protected by the CFGC, including nesting birds and Fully Protected species;
- Plant, fish, and wildlife species listed as Threatened or Endangered under CESA; and the laws and regulations for implementing CESA as defined in CFGC §2050 et seq. and the California Code of Regulations (CCR) 14 CCR §670.1 et seq., and candidates for listing under the statute (CFGC §2068);
- Species meeting the definition of 'Rare' or 'Endangered' under CEQA Guidelines 14 CCR §15125 (c) and/or 14 CCR §15380, including plants listed on CNPS Lists 1A, 1B, 2A, 2B, 3, and 4 (2001);
- USFWS Birds of Conservation Concern;
- Species of Special Concern, as designated by the CDFW and required by 14 CCR §15380; and/or
- Avian species protected under the MBTA of 1918.

5.2 Desktop Review

Sequoia reviewed relevant databases and literature for baseline information regarding biological resources occurring and potentially occurring on the Project site and the immediate vicinity, including:

- USFWS Information for Planning and Consultation (IPaC) search (USFWS 2020a), and Critical Habitat Portal (USFWS 2020b; Attachment B);

- CNPS Online Inventory of Rare and Endangered Plants of California for the Clearlake Oaks, California and eight surrounding USGS 7.5-minute quadrangles (CNPS 2020);
- NMFS Online Species List Query (NMFS 2020, Attachment C);
- USFWS National Wetlands Inventory (NWI; 2020c; Figure 5);
- CDFW California Natural Diversity Database (CNDDB) for the Project polygon and a 5-mile buffer (CDFW 2020; Figure 10); and,
- Aerial photographs (Google Earth 2020).

5.3 Site Assessment

Sequoia biologists, Mr. Jesse Reebs, Ms. Ari Rogers, and Mr. Andrew Ford, conducted surveys on the Project site on September 28 and 29, 2020, to record biological resources and to assess the limits of areas potentially regulated by resource agencies. Surveys involved searching all habitats on the site and recording all plant and wildlife species observed. Sequoia cross-referenced the habitats occurring on the Project site with the habitat requirements of regional special-status species to determine if the proposed Project could directly or indirectly impact these species. Any special-status species or suitable habitat was documented. Tables 1 and 2 present the potential for occurrence of special-status plant and wildlife species known to occur in the vicinity of the Project site, along with their habitat requirements, occurrence classification, and basis for occurrence classification.

Sequoia's site assessment included a preliminary hydrological analysis to determine if there could be potential areas within the Project site impact areas and within a 200-foot buffer that would be regulated as waters of the United States and/or state (Figures 5 and 6). This analysis was primarily based on the presence of hydrology, wetland soils, and/or wetland plant indicators. The level of analysis does not conform to the level of detail typically required for a formal wetland delineation suitable for submittal to the USACE. The results of our literature research and field reconnaissance are provided in the sections below.

5.4 Habitat Assessments

Consecutive transects were traversed at approximately 30-foot intervals throughout the Project site. During the surveys, biologists scanned for special-status species and/or suitable habitat for these species, including for foothill yellow-legged frog (*Rana boylii*) and western pond turtle (*Emys marmorata*), among others. Any special-status species or suitable habitat was documented. In addition, Sequoia biologists mapped limits of potential jurisdictional features (Figures 5 and 6) and boundaries of plant communities (Figure 7).

Potential to Occur

Following the site assessment, potential for special-status species to occur in the Study Area was evaluated according to the following criteria:

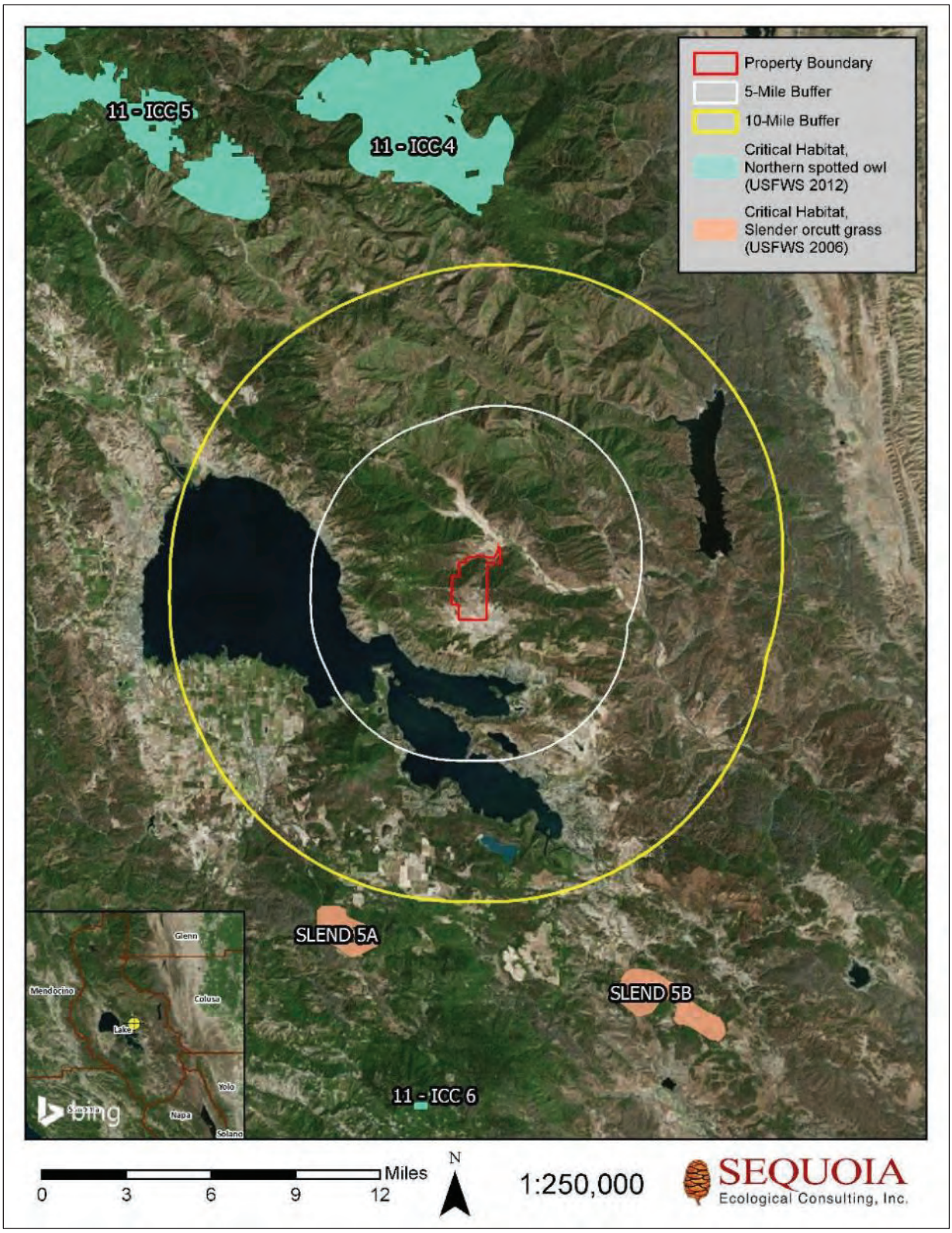

Figure 4. USFWS Critical Habitat in the Vicinity of the High Valley Ranch Project Site.

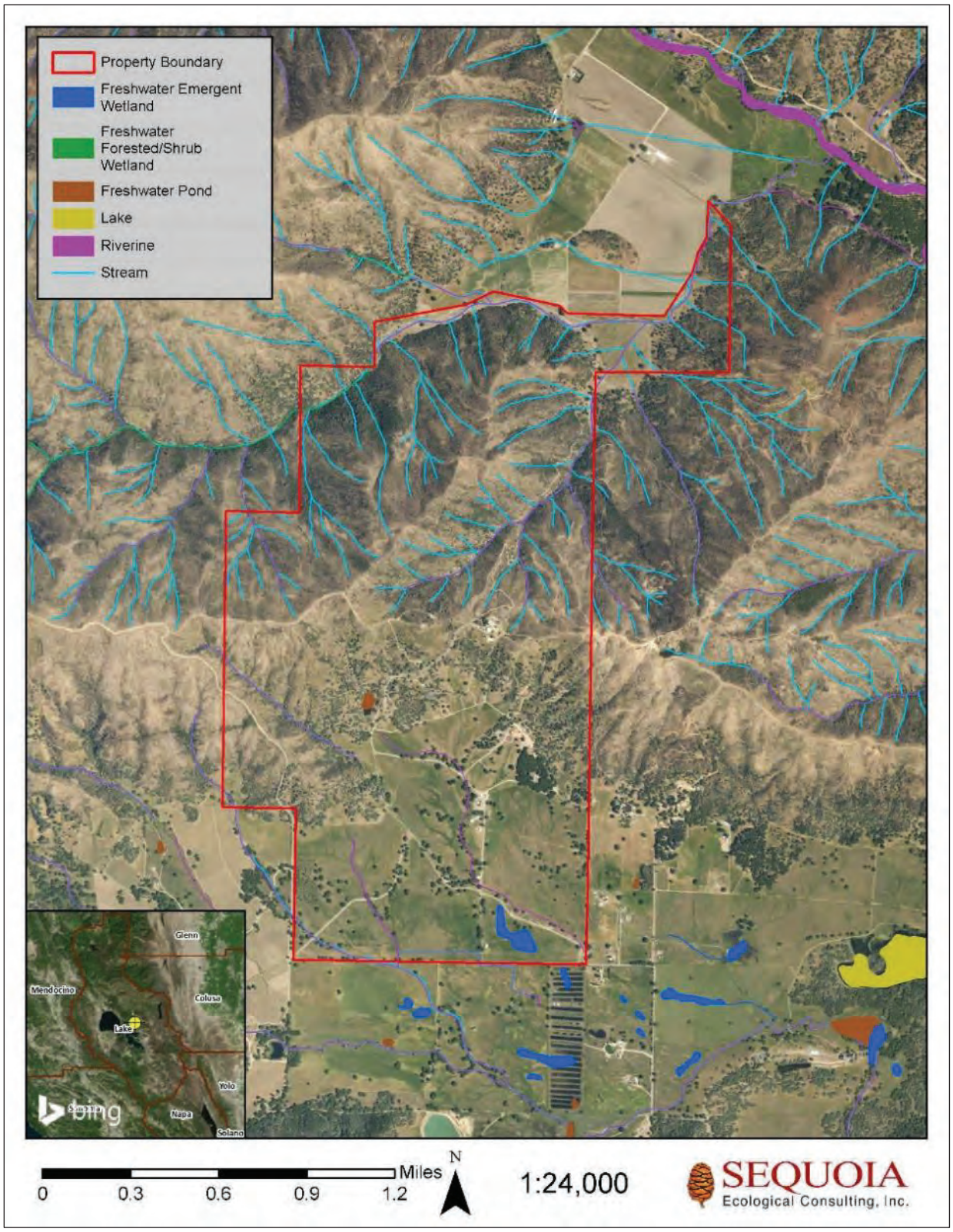

Figure 5. USFWS NWI Results on the High Valley Ranch Project Site.

- *No Potential.* Habitat on and adjacent to the site is clearly unsuitable for the species' requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- *Unlikely.* Few of the habitat components meeting the species' requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- *Moderate Potential.* Some of the habitat components meeting the species' requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- *High Potential.* All of the habitat components meeting the species' requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- *Present.* Species is observed on the site or has been recorded (e.g., CNDDB, other reports) on the site recently.

6 RESULTS

The results of the desktop review and site assessment conducted on September 28 and 29, 2020, are presented below.

6.1 Topography and Hydrology

The Project site is located within a complex of valleys and foothills in the northern Coast Ranges above Clear Lake. The central portion of the Project site is bisected by the foothills and peaks of the High Valley Ridge, which runs generally in an east-to-west direction. Two main peaks influence the topography of the Property, one on the western half of the Property that ranges between 2,000 and 2,400 feet in elevation, and another that begins on the eastern half of the Property and extends offsite where it peaks at approximately 2,600 feet above sea level. A canyon-like gap or pass is created where the two peaks converge along the center axis of the Property. The southern slopes of the High Valley Ridge lead down into High Valley which occupies the majority of the southern portion of the Project site. The northern slopes and consequent gap lead into a separate, unnamed valley that partially encompasses the northernmost portion of the Project site. Numerous small drainages and tributaries, classified as Class III watercourses, flow down the northern slopes of the foothills within the Project site before reaching a larger intermittent creek, a Class II watercourse per the Lake County Code of Ordinances, the California Forest Practice Rules (FPR), and the RWQCB. This aquatic feature occupies 9.17 acres and is characterized by a wide, heavily incised channel lined with rocky alluvium. This intermittent creek flows in a west-to-east direction across the northernmost boundary of the Project site, eventually flowing offsite and into Long Valley Creek. Long Valley Creek continues to flow eastward through the unnamed valley before reaching a confluence with Cache Creek.

Sheet flow is directed down the southern side of the peaks within the Project site, becoming

channelized to form several ephemeral (Class III) drainages. These drainages, totaling 20.38 acres, convey water throughout the southern portion of the Project site and are culverted below road crossings in several instances (Figures 5 and 6). The natural dimensions of the ephemeral drainages in the southern portion of the Project site varied in degree, ranging between swale-like features characterized by evidence of scour and deeply channelized features with steep banks and eroded slopes. These drainages generally flow in a northwest to southeast direction before exiting the Project site via culverts on the southern and southeastern Property boundaries. Based on a review of aerial imagery and the NWI database map, these features are tributary to Schindler Creek, which flows through the southern edge of the High Valley area before draining into Clear Lake.

A small, 0.35-acre stock pond is present in the central portion of the Project site (Figures 5 and 6). This pond contained water during the September 2020 surveys, indicating it is perennial and therefore categorized as a Class I watercourse.

The climate of the Project site is Mediterranean (i.e., subtropical), with warm, dry summers with average highs of 80 - 90 degrees Fahrenheit, and cool, wet winters with average highs in the 60s and average lows of 30 - 40 degrees Fahrenheit. The average annual precipitation is approximately 31.42 inches, falling primarily between October and May (US Climate Data 2020).

During the preliminary hydrology analysis component of the September 28 and 29, 2020 surveys, Sequoia mapped the locations of culverts, drainages, and other features potentially jurisdictional under the USACE and the RWQCB.

6.2 Soils

The Project site is primarily underlain by Manzanita loam, Maymen-Etsel, Snook complex, Maymen-Hopland-Etsel association, Maymen-Hopland-Mayacama association, Maymen-Mellsholm-Bressa complex, Millsholm-Bressa loam, Millsholm-Bressa-Hopland association, Talmage very gravelly sandy loam, Wappo loam, and Wolfcreek gravelly loam (Figure 8) (USDA Natural Resources Conservation Service [NRCS] 2020).

The Manzanita soils are comprised of very deep, well drained soils on terraces. The Maymen soils are typically shallow and somewhat excessively drained and permeability is moderate with surface runoff very rapid, and the hazard of erosion is severe. The Millsholm soils consist of shallow, well-drained soils with moderate permeability, rapid surface runoff, and the hazard of erosion is severe. The Talmage soil is a deep, somewhat excessively drained soil on alluvial fans and flood plains and in areas adjacent to drainageways. Permeability is moderately rapid, surface runoff is slow, and the hazard of erosion is slight. The Wappo soil is very deep with moderately rapid drainage on terraces. Permeability is very slow, surface runoff is rapid, and the hazard of erosion is moderate. The Wolfcreek soil is very deep, well-drained soil on flood plains. Permeability is moderately slow, surface runoff is very slow, and the hazard of erosion is slight.

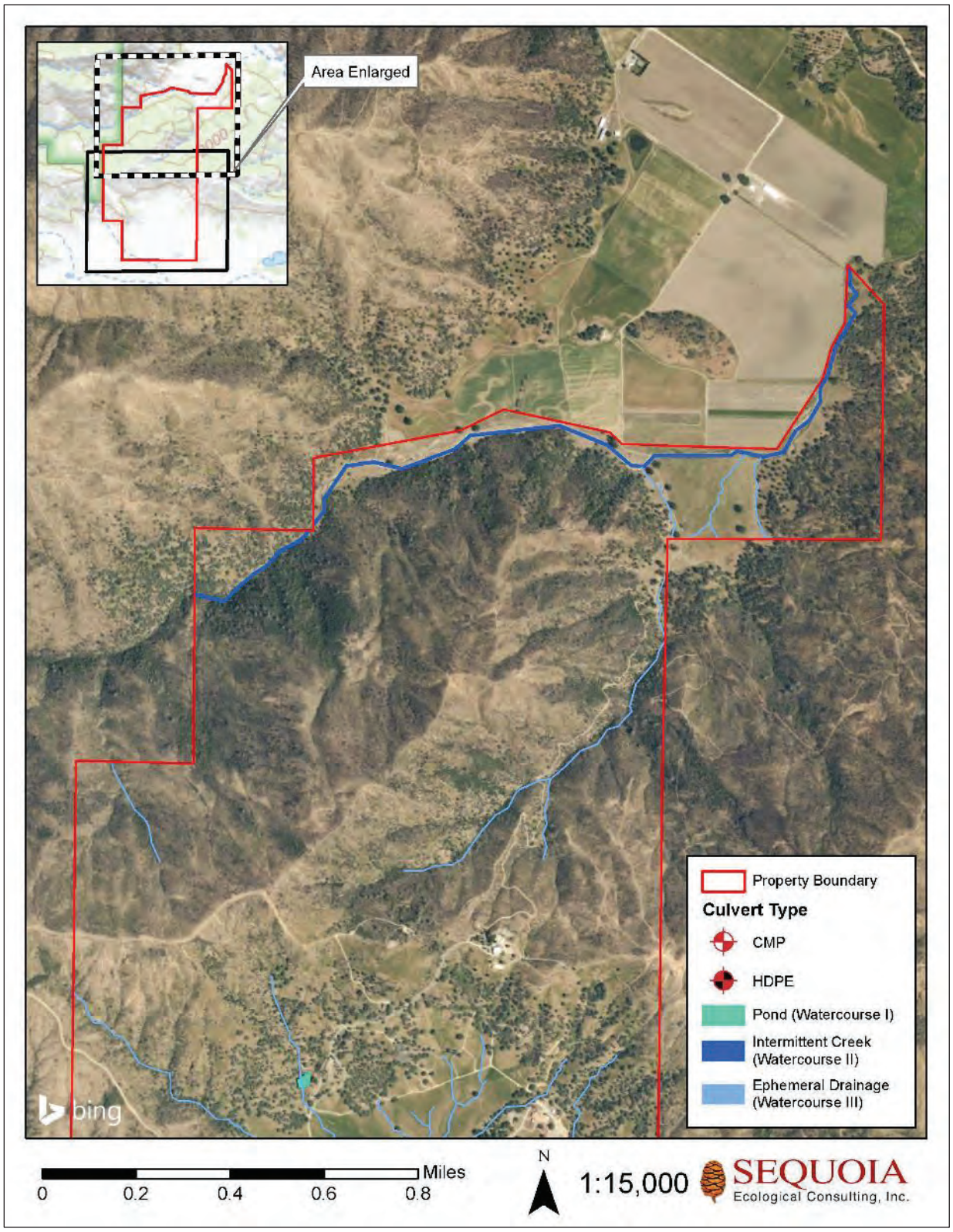

Figure 6. Potentially Jurisdictional Aquatic Features on the High Valley Ranch Project Site – Northern Portion of Property.

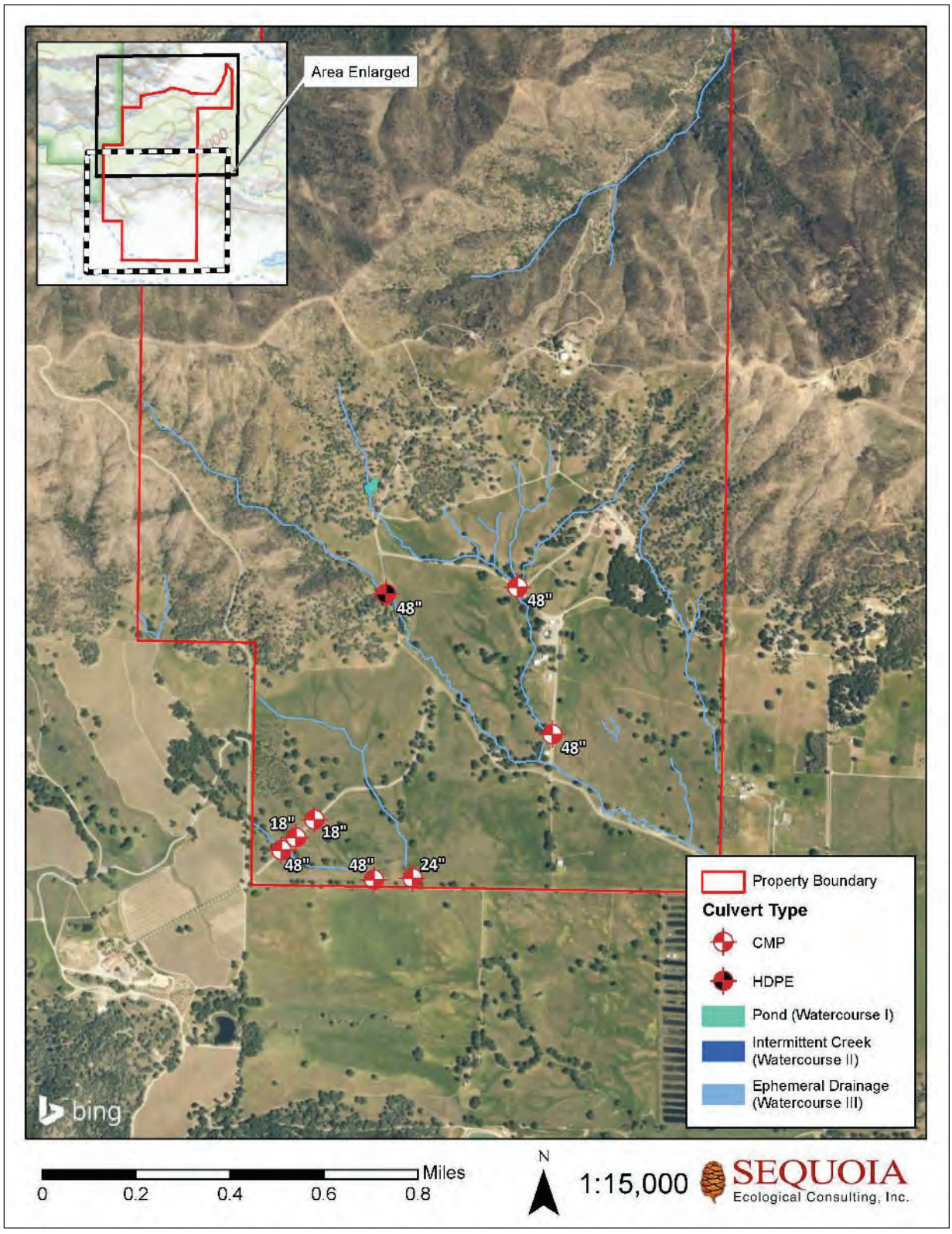

Figure 7. Potentially Jurisdictional Aquatic Features on the High Valley Ranch Project Site – Southern Portion of Property.

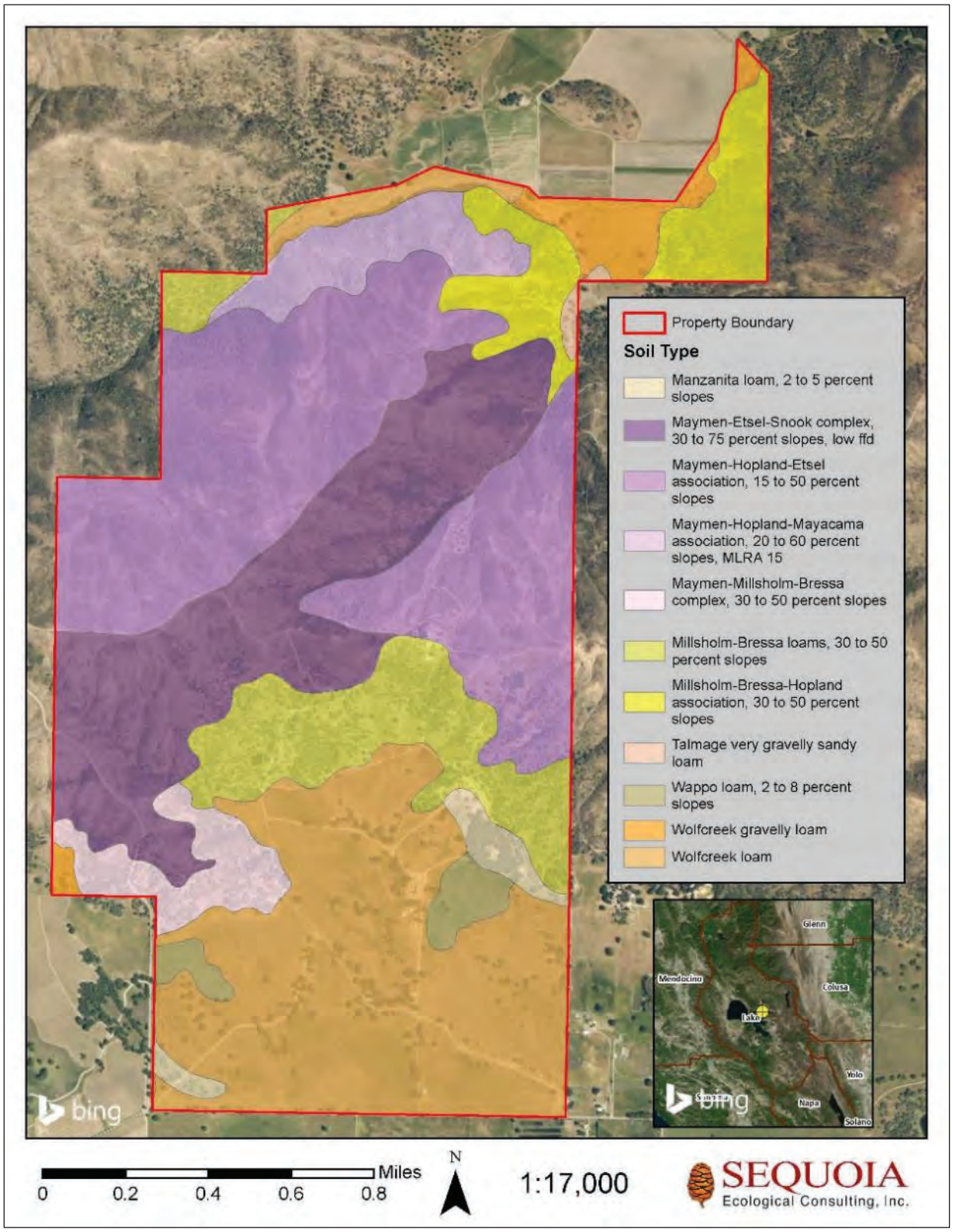

Figure 8. Soil Types on the High Valley Ranch Project Site.

6.3 Plant Communities and Wildlife Habitats

On September 28 and 29, 2020, Sequoia staff conducted a survey of the Project site and characterized vegetation present. During the survey, the biologists also documented plant and wildlife species observed on the Project site. Nomenclature used for plant names follows The Jepson Manual, Second Edition (Baldwin et al. 2012), while nomenclature used for wildlife follows CDFW's Complete List of Amphibian, Reptile, Bird, and Mammal Species in California (2016). As shown on Figure 7, plant communities were mapped on the Project site (Sawyer and Keeler-Wolf 2009), and are described below.

6.3.1.1 Agricultural Field

The agricultural fields on the Project site are regularly disked and were observed to be completely devoid of vegetation during the September 28-29, 2020 site surveys. As a result of routine manipulation of soils, no small mammal burrows or other suitable plant or wildlife habitat were present within the agricultural fields. These fields are regularly used for livestock grazing during the growing season. Dominant species along the outer edges of the agricultural fields are comprised of ruderal and non-native species, such as wild oat (*Avena* spp.), European heliotrope (*Heliotropium europaeum*), yellow star thistle (*Centaurea solstitialis*), turkey mullein (*Croton setiger*), stinking goosefoot (*Chenopodium vulvaria*), vinegarweed (*Trichostemma lanceolata*), ribwort plantain (*Plantago lanceolata*), and Harding grass (*Phalaris aquatica*).

Common wildlife species observed within agricultural fields on the Project site include European starling (*Sturnus vulgaris*), western meadowlark (*Sturnella neglecta*), red-winged blackbird (*Agelaius phoeniceus*), lesser goldfinch (*Spinus psaltria*), house finch (*Carpodacus mexicanus*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), and western fence lizard (*Scleoporus occidentalis*).

The agricultural fields account for approximately 269.04 acres on the Project site (Figure 7).

6.3.1.2 Anthropogenic

Anthropogenic communities are communities dominated by plants introduced by humans or maintained by human disturbance. These communities are often around residential, commercial, and industrial developments. On the Project site, the areas surrounding the residences and agricultural buildings are vegetated by ruderal species, including Canada horseweed (*Erigeron canadensis*), chicory (*Chicorum intybus*), yellow star thistle, turkey mullein, and fluellin (*Kickxia elatine*).

Common wildlife species observed within the anthropogenic communities on the Project site are consistent with those seen in other habitat types, and include house finch, Say's phoebe (*Sayornis saya*), western bluebird (*Sialia mexicana*), western fence lizard, and lesser goldfinch.

Anthropogenic communities account for approximately 5.69 acres on the Project site (Figure 7).

6.3.1.3 Non-native Annual Grassland

Non-native annual grassland is comprised primarily of plant species that mature in spring and early summer, before spreading seed and dying in late summer and fall. Non-native annual grassland is found in several areas across the Project site, but primarily within the southern third of the Property. Dominant grass and forb species observed within non-native annual grassland communities on the Project site include slender wild oat, medusa head grass (*Elymus caput-medusae*), Harding grass, yellow star thistle, brome grasses (*Bromus* spp.), field bindweed (*Convolvulus arvensis*), Indian milkweed (*Aesclepias eriocarpa*), and common willowherb (*Epilobium ciliatum*).

Wildlife species observed in the non-native annual grassland communities were consistent with those found in the agricultural fields, but also included savanna sparrow (*Passerculus sandwichensis*), Brewer's blackbird (*Euphagus cyanocephalus*), Say's phoebe, and western bluebird. Several raptor species, including red-tailed hawk (*Buteo jamaicensis*), northern harrier (*Circus hudsonius*), and American kestrel (*Falco sparverius*), were observed utilizing non-native annual grassland as foraging habitat. Other wildlife species observed in the non-native grassland communities included Botta's pocket gopher (*Thomomys bottae*), meadow vole (*Microtus californicus*), pacific gopher snake (*Pituophis catenifer catenifer*), and California ground squirrel (*Otospermophilus beecheyi*).

The non-native annual grassland community accounts for approximately 138.75 acres on the Project site (Figure 7).

6.3.1.4 Chaparral

Chaparral is a one- to two-layer community characterized by a dominance of drought-adapted sclerophyllous (having thick, leathery leaves), evergreen shrubs approximately 6-13 feet tall (Holland 1986). Dominant shrub and forb species observed within chaparral communities on the Project site include chamise (*Adenostoma fasciculatum*), manzanita (*Arctostaphylos* spp.), toyon (*Heteromeles arbutifolia*), yerba santa (*Eriodycton californicum*), sticky monkeyflower (*Diplacus aurantiacus*), naked-stem buckwheat (*Eriogonum nudum*), and Pacific stonecrop (*Sedum spathulifolium*). Woody species observed in the chaparral communities include western redbud (*Cercis occidentalis*), California buckeye (*Aesculus californica*), mountain mahogany (*Cercocarpus betuloides*), and leather oak (*Quercus durata*).

Common wildlife species observed within the chaparral community on the Project site include California scrub jay (*Aphelocoma californica*), acorn woodpecker (*Melanerpes formicivorus*), California quail (*Callipepla californica*), and mourning dove.

The chaparral community accounts for approximately 755.77 acres on the Project site (Figure 7).

6.3.1.5 Orchard

In many areas of California, plantations of trees (i.e., orchards) have been established for various purposes. Many are planted for agricultural purposes while others are planted for use as windbreaks. Numerous English walnut trees (*Juglans regia*) are planted in the southwestern corner of the Project site.

Wildlife species observed within the orchard community on the Project site were consistent with those seen in the mixed oak woodland and agricultural habitats.

The orchard community accounts for approximately 8.08 acres on the Project site (Figure 7).

6.3.1.6 Valley Foothill Woodland

The northern portion of the Property is dominated by valley foothill woodland, a habitat type characterized by a combination of deciduous and coniferous trees generally found in areas of higher elevation. This community is primarily comprised of gray pine (*Pinus sabiniana*), interior live oak (*Quercus chrysolepis*), and valley oak (*Quercus lobata*).

Wildlife species observed within the valley foothill woodland community on the Property include chestnut-backed chickadee (*Poecile rufescens*), acorn woodpecker, red-breasted nuthatch (*Sitta canadensis*), turkey vulture (*Cathartes aura*), and red-tailed hawk.

The valley foothill woodland community accounts for approximately 358.66 acres on the Project site (Figure 7).

6.3.1.7 Mixed Oak Woodland

Mixed oak woodland is a community found throughout California and is dominated by multiple species of oak trees (*Quercus* spp.). This habitat is present in several areas across the Property and is comprised of interior live oak, valley oak, and blue oak (*Quercus douglasii*) trees. Understory composition varies between grassland and ruderal communities, and grasses such as bristly dogtail grass (*Cynocurus echinatus*), wild oats, yellow star thistle, red brome (*Bromus madritensis*), and ripgut brome (*Bromus diandrus*) were common.

Wildlife species observed within the oak woodland communities on the Project site include acorn woodpecker, Nuttall's woodpecker (*Picoides nuttallii*), oak titmouse (*Baeolophus inornatus*), chestnut-backed chickadee, yellow warbler (*Setophaga petechia*), black-throated gray warbler (*Setophaga nigrescens*), yellow-rumped warbler (*Setophaga coronata*), northern flicker (*Colaptes auratus*), Cooper's hawk (*Accipiter cooperii*), and tree swallow (*Tachycineta bicolor*).

The oak woodland community accounts for approximately 44.10 acres on the Project site (Figure 7).

6.3.1.8 Ephemeral Drainages

Ephemeral drainages flow following precipitation events during the wet season. These features convey water from vertical precipitation and as topographic depressions within valley systems, and gather water from upland areas via sheet flow. On the Project site, ephemeral drainages located in the northern half of the Property generally flow south-to-north before entering a west-to-east intermittent creek (Watercourse II) that makes up the northern Project boundary. Ephemeral drainages in the southern half of the Property generally flow north-to-south before entering culverts beneath High Valley Road (Figure 6). These features would likely be categorized as Watercourse III per the Lake County Code of Ordinances, the California FPR and the RWQCB, as discussed in more detail above in Section 4.

Due to the ephemeral nature and seasonality of the drainages on the Property, the plant species composition within these features was comprised of a mix of hydrophytic and upland species consistent with the surrounding non-native annual grassland communities. During the dry summer months, upland species such as Indian milkweed and wild oat inhabit the drainages, while emergent and hydrophytic species are dominant during the wet season. Several wetland plant species were still present or identifiable in the drainages during the September 2020 surveys, including rushes (*Juncus* spp.), Italian ryegrass (*Festuca perennis*), purple sand spurrey (*Spergularia rubra*), and willowherb (*Epilobium ciliatum*). Additionally, many of the ephemeral drainages within the Property were altered by erosion and cattle, allowing for species characteristic of disturbed areas, such as Fitch's tarplant (*Centromadia fitchii*) and yellow star thistle, to become established.

Wildlife species observed within the ephemeral drainages on the Project site were consistent with those seen in the surrounding upland habitats. Ground squirrels and their burrows were noted along the banks of many of the drainages and were providing refuge habitat for other wildlife species, such as western fence lizard and pacific gopher snake, which were both observed.

Ephemeral drainages occupy a total of 20.38 acres on the Project site (Figures 5 and 6).

6.3.1.9 Intermittent Creek

Intermittent creeks flow more often than just after a single precipitation event and only cease to flow during very dry periods. The flow may occur when the water-table is seasonally high; however, no flow will occur when the water-table is significantly below the river-channel bed level.

One intermittent creek feature occurs along the northern Property boundary flowing west-to-east (Figure 5). This feature was dry and mostly devoid of vegetation during the September 2020 surveys. Species occurring within this feature included yerba santa, wooly mullein (*Verbascum thapsus*), and Indian milkweed.

The intermittent creek, which would likely be classified as a Class II Watercourse, occupies a total of 9.17 acres (Figure 5).

6.3.1.10 Pond

One perennial, freshwater 0.35-acre pond is present in the central portion of the Property (Figure 5 and 6). This feature would most likely be defined as a Class I Watercourse, per the aforementioned ordinances and described in more detail in Section 4 above. The pond contained water during the September 2020 surveys and supported dense stands of hydrophytic and emergent vegetation, such as cattails (*Typha latifolia*), rushes, spikerush (*Eleocharis macrostaycha*), rabbit's-foot grass (*Polypogon monspeliensis*), and cocklebur (*Xanthium strumarium*), along its edge.

Common wildlife species observed within the pond on the Project site include American bullfrog (*Lithobates americanus*), meadow vole (*Microtus californicus*), black phoebe (*Sayornis nigricans*), lesser goldfinch, and Bewick's wren (*Thyromanes bewickii*).

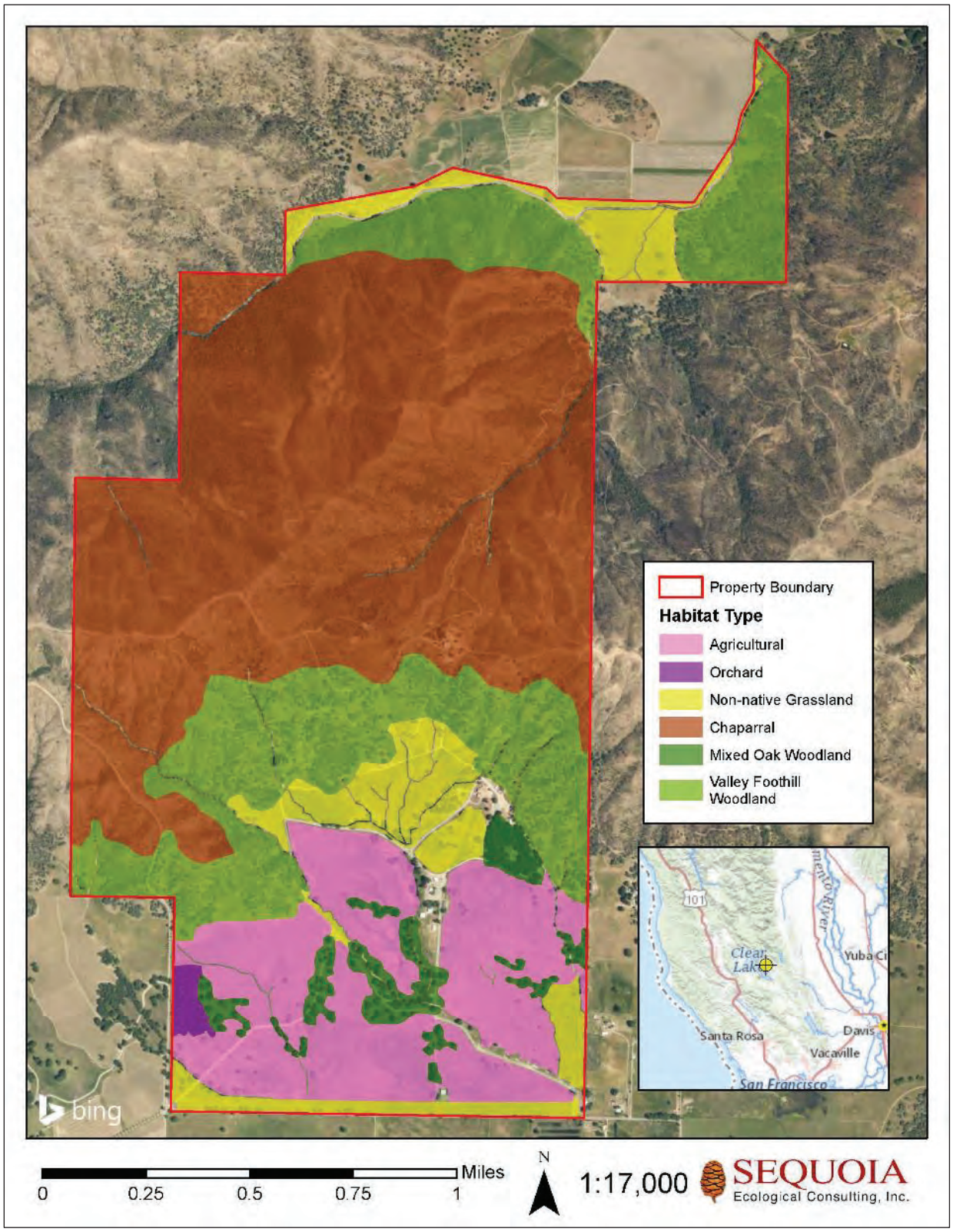

Figure 9. Plant Communities on the High Valley Ranch Project Site.

6.3.2 Wildlife Corridors

Wildlife corridors are habitats that provide connectivity between natural communities otherwise separated by urbanization and other development. Wildlife corridors provide access for animals to travel between these communities for seasonal migration, access to overwintering/summering habitat, breeding, etc. They also allow animals a route to move away from natural disasters and other forms of habitat loss, as well as to recolonize habitats previously extirpated. Wildlife corridors provide opportunities to breed, forage, migrate/emigrate, disperse, and forage (Beier and Loe 1992).

The proposed Project will not interfere with the movement of native wildlife. This Project is a cannabis cultivation operation and development of this Project site is limited to the cannabis production and canopy areas, which are currently proposed to be located within agricultural areas on the southernmost parcel that have been routinely disturbed due to regular disking practices. Fencing and other cannabis-related infrastructure, while possibly impeding movement, will not alter the potential for wildlife migration and dispersal across the site as a whole; wildlife will still be able to navigate through the open space surrounding the production areas and infrastructure. Therefore, the Project should not impact wildlife movement as the majority of the Property will remain undeveloped. In addition, as currently planned, the proposed Project will have no adverse effects on fish movement along the watercourses as these features will be avoided.

6.3.3 Special-Status Plants

Figure 10 provides a graphical illustration of special-status plant species occurrences within 5 miles of the Project site. Table 1 provides an assessment of potential to occur of special-status plant species on the Project site. Eight special-status plants have been previously documented within 5 miles of the Project site; however, no special-status plants have been observed or mapped on the Property itself. Sequoia analyzed the potential to occur for these plant species, as well as species included in CNPS and IPaC resource lists during the desktop review (Table 1). All of these species require specialized habitats such as playas, vernal pools, seeps, and serpentinite or volcanic soils that are not found on the Project site. Due to lack of suitable habitat and/or lack of known/recent occurrences in the Project vicinity, these eight special-status plant species are not expected to occur and are therefore not discussed further in this analysis. These species are: Anthony peak lupine (*Lupinus antoninus*), bent-flowered fiddleneck (*Amsinckia lunaris*), Colusa layia (*Layia septentrionalis*), eel-grass pondweed (*Potamogeton zosteriformis*), Konocti manzanita (*Arctostaphylos manzanita* ssp. *elegans*), Rincon Ridge ceanothus (*Ceanothus confusus*), small-flowered calycadenia (*Calycadenia micrantha*), and watershield (*Brasenia schreberi*) (Table 1, Figure 10).

Table 1. Special-Status Plant Species with Potential to Occur on the High Valley Ranch Project Site.

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrence
Amsinckia lunaris	bent-flowered fiddleneck	1B.2	Occurs in chaparral, cismontane woodland, and valley and foothill grassland, at elevations of 5 to 1,640 feet.	None. Marginal suitable habitat occurs on the Project site.
Arctostaphylos manzanita ssp. *elegans*	Konocti manzanita	1B.3	Occurs in volcanic soils in chaparral, cismontane woodland, and lower montane coniferous forest, at elevations of 1,295 to 5,300 feet.	None. No suitable habitat occurs on the Project site. Project site outside of elevational range of species.
Arctostaphylos stanfordiana ssp. *raichei*	Raiche's manzanita	1B.1	Occurs in rocky, serpentinite soils within chaparral and lower montane coniferous forest openings, at elevations of 1,476 to 3,396 feet.	None. No suitable habitat occurs on the Project site. Project site outside of elevational range of species.
Astragalus rattanii var. *jepsonianus*	Jepson's milkvetch	1B.2	Occurs in serpentine soils in chaparral, cismontane woodland, and valley and foothill grassland at elevations of 965 to 2,295 feet.	None. There is no suitable serpentine habitat on the Project site. The Project site is outside the elevation range of this species. There are no occurrences within 5 miles of the Project site.
Balsamorhiza macrolepis	big-scale balsamroot	1B.2	Occurs in serpentine soils in chaparral, cismontane woodland, and valley and foothill grasslands at elevations of 145 to 5,100 feet.	None. No suitable serpentine habitat occurs on the Project site. There are no recent occurrences of this species in southern Lake County.
Brasenia schreberi	watershield	2B.3	Occurs in marshes and freshwater swamps, at elevations of 95 to 7,720 feet.	None. Marginal suitable habitat occurs on the Project site.
Calycadenia micrantha	small-flowered calycadenia	1B.2	Occurs in sparsely vegetated areas (roadsides, rocky, talus, scree) and sometimes serpentine habitats in chaparral, volcanic meadows and seeps, and valley and foothill grasslands at elevations of 16 to 4,920 feet.	Low. Some habitat present in the northern foothill and volcanically influenced scree and seeps in the north of the Project site. No serpentine soils present on the Project site.

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrence
Calystegia collina ssp. *tridactylosa*	three-fingered morning-glory	1B.2	Occurs in serpentinite, rocky or gravelly openings in chaparral and cismontane woodland at elevations of 0 to 1,968 feet.	Low. No serpentine habitat located on the Project site. Suitable gravelly scree openings in the chaparral north of the Project site. There is one recent occurrence in southeastern Lake County.
Carex hystericina	porcupine sedge	2B.1	Occurs in coastal prairies, marshes and swamps (lake margins), as well as valley and foothill grassland, at elevations less than 2,050 feet.	None. Marginal suitable habitat occurs on the Project site.
Carex klamathensis	Klamath sedge	1B.2	Occurs in serpentine soils in chaparral, cismontane woodland, meadows, and seeps at elevations of 3,280 to 3,740 feet.	None. There are no suitable serpentine soils on the Project site. The Project site is located outside of the elevational range.
Castilleja rubicundula var. *rubicundula*	pink creamsacs	1B.2	Occurs in serpentine soils in chaparral openings, cismontane woodland, meadows and seeps, and valley and foothill grasslands at elevations of 65 to 2,985 feet.	None. There are no suitable serpentine soils present on the Project site.
Ceanothus confusus	Rincon Ridge ceanothus	1B.1	Occurs in volcanic or serpentinite soils in closed-cone coniferous forest, chaparral, and cismontane woodland, at elevations of 245 to 3,495 feet.	None. No suitable habitat occurs on the Project site.
Chlorogalum pomeridianum var. *minus*	dwarf soaproot	1B.2	Occurs in serpentine soils in chaparral at elevations of 1,000 to 3,280 feet.	None. There is no suitable serpentine habitat on the Project site.
Cryptantha dissita	serpentine cryptantha	1B.2	Occurs in serpentinite soils within chaparral, at elevations of 1,295 to 1,905 feet.	None. No suitable habitat occurs on the Project site. Project site outside of elevational range of species.
Eriastrum brandegeeae	Brandegee's erisatrum	1B.1	Occurs in volcanic and sandy soils in chaparral and cismontane	Low. Marginal habitat is found in the north of the site but no recent

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrence
			woodland at elevations of 1,394 to 2,755 feet.	occurrences in Lake County.
Erigeron greenei	Greene's narrow-leaved daisy	1B.2	Occurs in serpentinite or volcanic soils in chaparral at elevations of 262 to 3,297 feet.	None. There is no suitable serpentine habitat on the Project site.
Eriogonum nervulosum	Snow Mountain buckwheat	1B.2	Occurs in serpentine soils in chaparral at elevations of 984 to 6,906 feet.	None. There is no suitable serpentine habitat on the Project site.
Eryngium constancei	Loch Lomond button-celery	1B.1	Occurs in vernal pools at elevations of 1,509 to 2,805 feet.	None. There are no vernal pools on the Project site.
Fritillaria pluriflora	adobe-lily	1B.2	Occurs often in adobe soils in chaparral, cismontane woodland, and valley and foothill grassland at elevations of 196 to 2,312 feet.	None. There are no adobe soils located on the Project site.
Gratiola heterosepala	Boggs Lake hedge-hyssop	CE, 1B.2	Occurs in clay on marshes and swamps (lake margins), at elevations of 30 to 7,790 feet.	None. No suitable habitat occurs on the Project site.
Harmonia hallii	Hall's harmonia	1B.2	Occurs in serpentine soils in chaparral at elevations of 1,000 to 3,198 feet.	None. There is no suitable serpentine habitat on the Project site.
Hesperolinon adenophyllum	glandular western flax	1B.2	Occurs on serpentine soils in chaparral, cismotane woodland and valley and foothill grassland at elevations of 490 to 4,315 feet.	None. There is no suitable serpentine habitat on the Project site.
Hesperolinon bicarpellatum	two-carpellate western flax	1B.2	Occurs on serpentine soils in chaparral at elevations of 195 to 3,295 feet.	None. There is no suitable serpentine habitat on the Project site.
Hesperolinon didymocarpum	Lake County western flax	1B.2	Occurs on serpentine soils in chaparral, cismontane woodland and valley and foothill grassland at elevations of 1,080 to 1,230 feet.	None. There is no suitable serpentine habitat on the Project site.
Hesperolinon drymarioides	Drymaria-like western flax	1B.2	Occurs on serpentine soils in closed-cone coniferous forest, cismontane woodland, chaparral and valley and foothill grassland at elevations of 325 to 3,705 feet.	None. There is no suitable serpentine habitat on the Project site.
Hesperolinon sharsmithiae	Sharsmith's western flax	1B.2	Occurs on serpentine soils in chaparral at elevations of 885 to 995 feet.	None. There is no suitable serpentine habitat on the Project site.

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrence
Horkelia bolanderi	Bolander's horkelia	1B.2	Occurs on serpentine soils in chaparral, lower montane coniferous forest, meadows and seeps, and valley and foothill grassland, normally in vernally mesic areas at elevations of 1,475 to 3,610 feet.	None. There is no suitable serpentine habitat or vernally mesic areas on the Project site.
Imperata brevifolia	California satintail	2B.1	Occurs in mesic soils in chaparral, coastal scrub, alkali seeps and meadows, Mojavean desert scrub and riparian scrub in elevations of 0 to 3,985 feet.	None. Marginal habitat is present on-site but there are no recent occurrences of the species in Lake County.
Lasthenia burkei	Burke's goldfields	1B.1	Occurs in mesic soils of meadows and seeps and vernal pools at elevations of 45 to 1,975 feet.	None. There are no mesic soils or vernal pools located on the Project site.
Layia septentrionalis	Colusa layia	1B.2	Occurs in sandy and serpentinite soils in chaparral, cismontane woodland, and valley and foothill grassland, at elevations of 325 to 3,595 feet.	None. Marginal suitable habitat occurs on the Project site.
Legenere limosa	legenere	1B.1	Occurs in vernal pools at elevations of 0 to 2,885 feet.	None. There are no vernal pools located on the Project site and no recent occurrences in Lake County.
Lupinus antoninus	Anthony Peak lupine	1B.2	Occurs in rocky soils in lower montane coniferous forest and upper montane coniferous forest at elevations of 4,000 to 7,495 feet.	Low. Marginal rocky soils found in the north of the site, but limited coniferous forest located on the Project site. The Project site is located outside the elevational range.
Lupinus sericatus	Cobb Mountain lupine	1B.2	Occurs in broadleafed upland forest, chaparral, cismontane woodland, and lower montane coniferous forest, at elevations of 900 to 5,005 feet.	None. Project site outside of elevational range of species.
Navarretia leucoephala ssp. *bakeri*	Baker's navarretia	1B.1	Occurs in vernal pools with volcanic ash flow influence at elevations of 1,310 to 2,805 feet.	None. There are no vernal pools on the Project site

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrence
				and no evidence of volcanic ash flows.
Navarretia leucoephala ssp. *pauciflora*	few flowered navarretia	1B.1	Occurs in vernal pools with volcanic ash flow influence at elevations of 1,310 to 2,805 feet.	None. There are no vernal pools on the Project site and no evidence of volcanic ash flows.
Navarretia leucoephala ssp. *plieantha*	many-flowered navarretia	1B.2	Occurs in vernal pools with volcanic ash flow influence at elevations of 95 to 3,110 feet.	None. There are no vernal pools on the Project site and no evidence of volcanic ash flows.
Orcuttia tenuis	slender grass	1B.2	Occurs in vernal pools with gravelly soils at elevations of 110 to 5,775 feet.	None. There are no vernal pools on the Project site.
Potamogeton zoteriformis	eel-grass pondweed	2B.2	Occurs in assorted varieties of freshwater marches, swamps, and open water at elevations of 0 to 6,100 feet.	None. Marginal suitable habitat occurs on the Project site.
Sedella leiocarpa	Lake County stonecrop	1B.1	Occurs in vernally mesic depressions in volcanic outcrops in cismontane woodland, valley and foothill grassland, and vernal pools at elevations of 1,195 to 2,590 feet.	None. Marginal suitable habitat occurs on the Project site.
Sidalcea oregana ssp. *Hydrophila*	marsh checkerbloom	1B.2	Occurs in mesic soils of meadows and seeps and riparian forest at elevations of 3,605 to 7,545 feet.	None. There are no mesic seeps or meadows suitable for this species within the elevational range.
Streptanthus hesperidis	green jewelflower	1B.2	Occurs in rocky, serpentinite soils within chaparral openings and cismontane woodland, at elevations of 425 to 2,495 feet.	None. Marginal suitable habitat occurs on the Project site.
Trichostema ruygtii	Napa bluecurls	1B.2	Occurs in chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland, and vernal pools at elevations of 95 to 2,230 feet.	None. No suitable habitat occurs on the Project site. Project site outside of elevational range of species.
Viburnum ellipticum	oval-leaved viburnum	2B.3	Occurs in chaparral, cismontane woodland, and lower montane	None. There are no recent confirmed occurrences of

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrence
			coniferous forest at elevations of 705 to 4,595 feet.	this species in Lake County.

Key to status:
FT=Federally listed as threatened species
CT=California listed as threatened species
CE=California listed as endangered species
CNPS Rare Plant Rank
1A=Plants presumed extirpated in California, and either rare or extinct elsewhere
1B=Pants rare, threatened, or endangered in California, or elsewhere
2A=Plants presumed extirpated in California but common elsewhere
2B=Plants rare, threatened, or endangered in California but more common elsewhere
Note: CNPS ranks below 2B were excluded from this analysis.

6.3.4 Special-Status Wildlife

Figure 10 provides a graphical illustration of special-status wildlife species occurrences within 5 miles of the Project site. Table 2 provides an assessment of potential to occur for special-status wildlife species on the Project site. Seven special-status wildlife species have been previously documented (CNDDB occurrences) within 5 miles. Sequoia analyzed the potential to occur for these wildlife species, as well as species included in Calfish (2020), NMFS, and IPaC resource lists during the desktop review (Table 2). A number of these species require specialized habitat such as cobble-lined streams or large freshwater lakes that are not found on the Project site. Due to lack of suitable habitat and/or lack of recent occurrences in the Project vicinity, five special-status wildlife species are not expected to occur and are therefore not discussed further in this analysis. These five species are: foothill yellow-legged frog, Clear Lake hitch (*Lavinia exilicauda chi*), Clear Lake tule perch (*Hysterocarpus traskii lagunae*), Sacramento perch (*Archoplites interruptus*), and osprey (*Pandion haliaetus*). Descriptions and potential for occurrence of the remaining three special-status wildlife species are provided in more detail below (Table 2, Figure 10).

6.3.4.1 Western Pond Turtle

The western pond turtle, a California Species of Special Concern, is the only freshwater turtle native to greater California and is distributed along much of the western coast, from the Puget Sound in Washington south to the Baja Peninsula, Mexico (Storer 1930). Overall, western pond turtles are habitat generalists, and have been observed in slow-moving rivers and streams (e.g., in oxbows), lakes, reservoirs, permanent and ephemeral wetlands, stock ponds, and sewage treatment plants. They prefer aquatic habitat with refugia, such as undercut banks and submerged vegetation (Holland 1994), and require emergent basking sites, such as mud banks, rocks, logs, and root wads to thermoregulate their body temperature (Holland 1994, Bash 1999). Pond turtles are omnivorous and feed on a variety of aquatic and terrestrial invertebrates, fish, amphibians, and aquatic plants.

Western pond turtles regularly utilize upland terrestrial habitats, most often during the summer and winter, especially for oviposition (females), overwintering, seasonal terrestrial habitat use, and overland dispersal (Reese 1996, Holland 1994). Females have been reported ranging as far as 1,640 feet from a watercourse to find suitable nesting habitat (Reese and Welsh 1997). Nest sites are most often situated on south- or west-facing slopes, are sparsely vegetated with short grasses or forbs, and are scraped in sands or hard-packed, dry silt or clay soils (Holland 1994, Rathbun et al. 1992, Holte 1998, Reese and Welsh 1997). Western pond turtles exhibit high site fidelity, returning in sequential years to the same terrestrial site to nest or overwinter (Reese 1996).

Females in southern and central California lay their clutch as early as late April to late July, although they predominantly lay in June and July. In the early morning or late afternoon, gravid females leave the water and move upland to nest (Holland 1994). Natural incubation times vary, ranging from 80 to 100+ days in California. In northern California and Oregon, hatchlings remain in the nest after hatching and overwinter, emerging in the spring. In southern and central California, those that do not overwinter emerge from the nest in the early fall (Holland 1994).

The western pond turtle is known from two CNDDB occurrences within 5 miles of the Project site (CNDDB Occurrence No. 601 and 579; Figure 10). The freshwater pond on the Project site provides somewhat suitable basking, foraging, and breeding habitat, with adequate upland nesting habitat present within the adjacent grassland and woodland. Western pond turtle was not observed in the pond habitat or surrounding uplands during the September 2020 surveys. The pond is not located in an area where cultivation and development are proposed. **Therefore, the proposed Project as designed will avoid impacts to breeding and dispersal habitat, as well as wintering and upland nesting habitat. Thus, no impacts to this species pursuant to CEQA are expected to occur. Mitigation will likely not be required.**

6.3.4.2 Townsend's Big-eared Bat

Townsend's big-eared bat (*Corynorhinus townsendii*) is designated as a California Species of Special Concern and High Priority species by the Western Bat Working Group (CDFW 2019). The Townsend's big-eared bat is an uncommon resident throughout California, inhabiting mesic environments. The species is a moth specialist and typically roosts in cavities measuring 16 inches in diameter or greater in caves, mines, bridges, building, rock crevices, tree hollows in coastal lowlands, and cultivated valleys and nearby hills characterized by mixed vegetation below 11,000 (Sherwin and Rambaldini 2017b). Townsend's big-eared bats exhibit a high site fidelity and are highly sensitive to disturbance. They forage by gleaning insects from trees and shrubs along edge habitats near water. Foraging bouts peak in late evening and may span long distances. Winter hibernacula are used from October to April.

The closest known record for Townsend's big-eared bat is located immediately north of the Project site; however, the date of this occurrence is approximately 70 years old making it historical (CNDDB Occurrence No. 631; Figure 10). Regardless, the mature oak trees and man-

made structures on the Project site provide suitable roosting habitat; however, as currently designed, the proposed Project will not impact trees or structures. **Regardless, until pre-construction surveys are conducted that confirm or negate this species' presence on the Project site, impacts (i.e., noise disturbance) to Townsend's big-eared bat would be potentially significant pursuant to the CEQA.** If Townsend's big-eared bats are identified roosting on or immediately adjacent to the Project site, mitigation measures will be implemented (see Impacts Analysis section).

6.3.4.3 Pallid Bat

The pallid bat (*Antrozous pallidus*) is designated as a California Species of Special Concern by CDFW and a Medium Priority species by the Western Bat Working Group (CDFW 2019). The pallid bat is a relatively large, light-colored bat ranging throughout the southwestern United States from interior British Columbia to Mexico (Hermanson and O'Shea 1983, Sherwin and Rambaldini 2017a). They inhabit foothills and lowlands near water throughout California below 6,560 feet in elevation, but are most abundant in arid deserts and grasslands, particularly in areas with rock outcrops near water (Hermanson and O'Shea 1983). Pallid bats typically roost in small groups in a variety of roosts, including bridges, buildings, tree hollows in coast redwoods, bole cavities in oaks, exfoliating bark, rock crevices in outcrops and cliffs, caves, and mines, as both day and night roosts (Sherwin and Rambaldini 2017a). Roost sites may change seasonally and are typically reused for a few days to weeks. Pallid bats primarily feed on a variety of arthropods by capturing prey on the ground or gleaning them from surfaces near the ground. Parturition varies with latitude, but generally occurs from late-April to August; maternal colonies disperse by October (Hermanson and O'Shea 1983). Overwintering is common along the California coast, but individuals may migrate short distances between winter and summer roosts (Sherwin and Rambaldini 2017a).

The only known record for pallid bat within 5 miles of the Property is located approximately 3.5 miles southeast of the Project site. This occurrence is dated to 1945 making it historical (CNDDB Occurrence No. 183; Figure 10). Regardless, the mature oak trees and man-made structures on the Project site provide suitable roosting habitat; however, as currently designed, the proposed Project will not impact trees or structures.. **Regardless, until pre-construction surveys are conducted that confirm or negate this species' presence on the Project site, impacts (i.e., noise disturbance) to pallid bat would be potentially significant pursuant to the CEQA.** If pallid bats are identified roosting on or immediately adjacent to the Project site, mitigation measures will be implemented (see Impacts Analysis section).

Table 2. Special-Status Animal Species with Potential to Occur on the High Valley Ranch Project Site.

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrences
Mammals				
Antrozous pallidus	pallid bat	SSC	Have been found in diverse habitat communities ranging from evergreen forests, mixed oak and oak-bay woodlands, agricultural areas, and desert habitats. The distribution of the species is correlated with distance to rocky crevices in tree bark, under eaves and shingles of houses, and rock cavities and caves.	Moderate. Ample foraging habitat on-site and large oaks and structures allow for roosting.
Corynorhinus townsendii	Townsend's big-eared bat	SSC	Have been found in a diverse array of communities, including but not limited to, evergreen forests, mixed riparian forests, agricultural areas, and coastal habitats. Distribution is most strongly correlated with proximity to roosting habitats in rock cavities and caves.	Low. Some potential to roost in large oaks and structures on the Project site, moderate potential to forage within Project site. Marginal roosting habitat and suitable foraging habitat occur on the Project site.
Amphibians/Reptiles				
Rana boylii	foothill yellow-legged frog – Northwest/North Coast clade	SSC	Occurs in rocky streams, rivers containing rocky substrate and sometimes vegetated backwaters and shaded pools. Prefers open, sunny banks near water and adequate cover.	Unlikely. No suitable breeding, rearing, and dispersal habitat present adjacent to or on the Project site.
Emys marmorata	western pond turtle	SSC	Occurs in rivers, ponds, and freshwater marshes, and nests in upland areas (sandy banks or grassy open fields) up to 1,640 feet from water.	Moderate. Somewhat suitable habitat for basking, foraging, and breeding occurs on the Project site. Known from two CNDDB occurrences within 3 miles.
Fish				
Archoplites interruptus	Sacramento perch	SSC	Found in slow moving rivers, sloughs, and large lakes. This species prefers cool and freshwater habitats but can	Unlikely. Possible to occur adjacent to the Project site in Clear Lake, but unlikely on the Project site. Suitable

Scientific Name	Common Name	Listed Status	Habitat Requirements	Potential for Occurrences
			survive in low oxygen, warm or alkaline waters (pH 8-10). There is no preferred substrate.	habitat is found in Clear Lake and adjacent stagnant sloughs.
Hysterocarpus traskii lagunae	Clear Lake tule perch	SSC	The main population of this species occurs in Clear Lake (summer temperatures ranging from 75-79 °F) with sandy bottom substrate in fairly turbid water. Occupy deep pools and riffles with ample vegetative cover.	Unlikely. There are no water bodies large enough for the survival and reproduction of this species. Populations are likely in adjacent Clear Lake.
*Lavinia exilicauda chi**	Clear Lake hitch	SSC, CT	Prefer slow moving warm water environments (can withstand temperatures greater than 86 °F) such as stagnant portions of rivers and lakes. May also be present in brackish water with salinity levels up to 9 ppt. Spawning occurs when eggs are released into water and settle into gravel substrate.	Unlikely. Known from watershed, suitable habitat present in Clear Lake.
Birds				
Pandion haliaeetus	osprey	WL	Nests and winters along lake shores and water bodies in tall conifers and hardwood trees. Will utilize man-made towers, such as electrical poles and buildings.	Unlikely. There are no bodies of water that support fish for this species but birds may utilize tall conifers and oaks for nesting or roosting before foraging in adjacent bodies of water.

Key to status:
FE=Federally listed as endangered species
FT=Federally listed as threatened species
FC=Federally listed as a candidate species for listing
CE=California listed as endangered species
CT=California listed as threatened species
FP=California listed as fully protected
SSC=California species of special concern
WL=Watchlist species

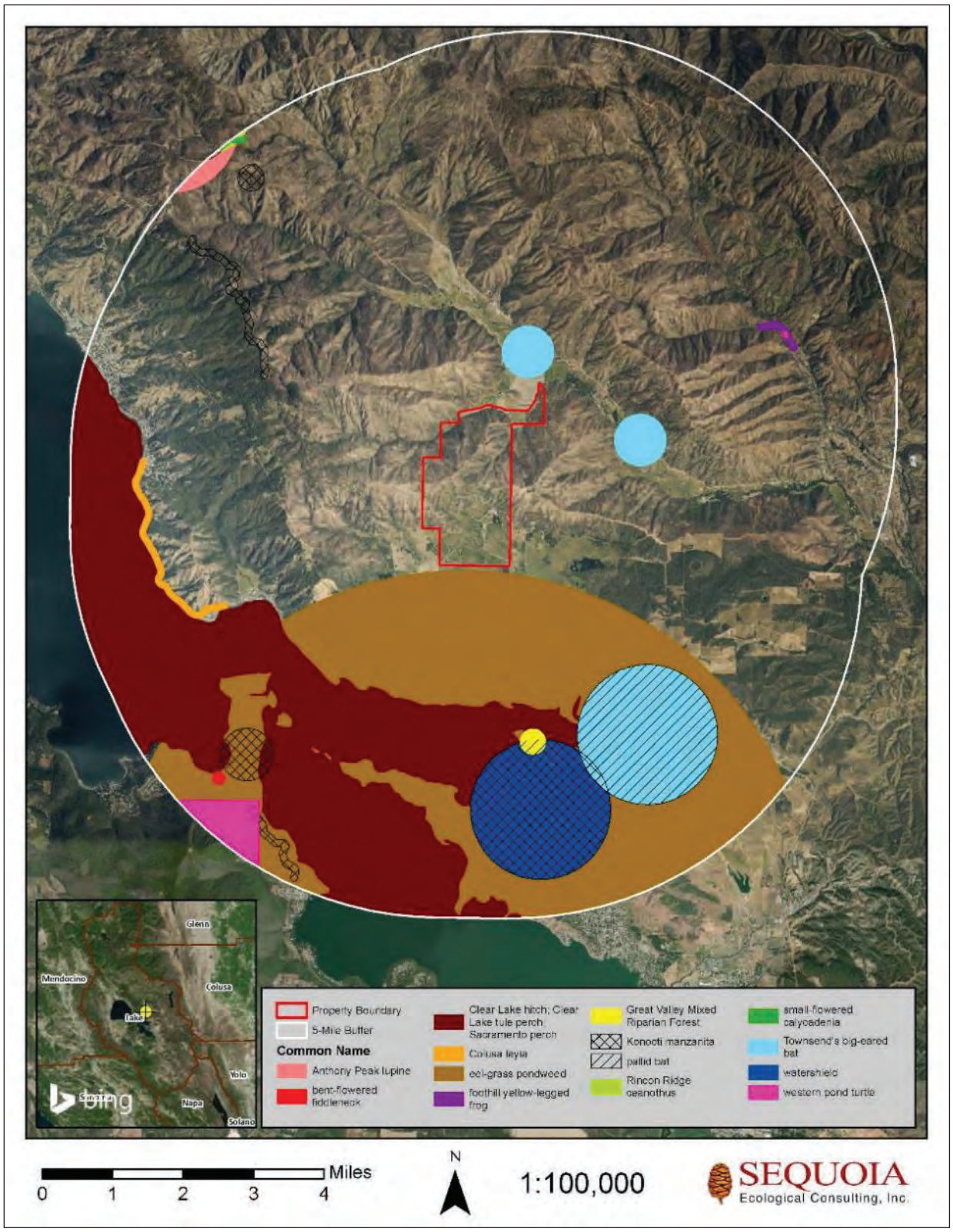

Figure 10. Closest Known Records for Special-Status Species Within 5 Miles of the High Valley Ranch Project Site.

7 DISCUSSION AND IMPACT ASSESSMENT

7.1 CEQA Checklist

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the Project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or US Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d. 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?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

7.2 Impacts Analysis

a. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the US Fish and Wildlife Service?

No special-status plant species were determined to have a potential to occur on the Project site due to the absence of suitable habitat types and specialized substrates, namely serpentine. Furthermore, surveys were conducted on September 28 and 29, 2020, to assess the composition of plant communities within the Project site and no special-status plants were detected.

Level of Significance before Mitigation: No Impact

7.2.1 Impact BIO-1. Nesting Birds and Special-Status Wildlife – Western Pond Turtle, Townsend's Big-eared Bat, and Western Red Bat

Based on the database and literature review conducted during the desktop review for the proposed Project, eight special-status wildlife species have been previously documented in the vicinity of the Project site (Table 2, Figure 10). Due to lack of suitable habitat and/or lack of recent occurrences in the vicinity of the Project site, five special-status wildlife species are not expected to occur and are not discussed further in this Biological Resources Report. These five species are: Clear Lake hitch, Clear Lake tule perch, Sacramento perch, foothill-yellow legged frog, and osprey.

Potential constraints associated with each remaining resource with potential to occur on-site are provided below.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

<u>BIO-1a: Migratory Birds and Raptors/Nest Avoidance</u>

Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside the Project site where birds could be disturbed by construction-related noise or earth-moving vibrations.

If active nest, roost, or burrow sites are identified within the Project site, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed

Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors will be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work will have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

BIO-1b: Roosting Bats

A qualified biologist shall be hired to conduct surveys for special-status bats (Townsend's big-eared bat and pallid bat) no more than two weeks prior to planned commencement of construction activities that have the potential to disturb bat day roosts or maternity roosts through elevated noise levels or removal of trees. If a visual survey is not sufficient to determine the presence/absence of bats, acoustic equipment (e.g., AnaBat) shall be used to determine potential occupancy type of species present. If an active maternity roost is detected, a qualified biologist shall determine an appropriate avoidance buffer to be maintained from April 1 until young are flying (typically through August). If an active day roost is detected in a tree or structure planned for removal, or within a zone of influence (i.e., area subject to noise, vibration) that could result in roost abandonment, as determined by a qualified biologist, the bats shall be safely evicted under the guidance of a qualified biologist. Day roosts shall not be removed unless the daytime temperature is at least 50 °F and there is no precipitation. Mitigation for day roosts impacted by the Project will be achieved through the installation of bat houses on-site to replace lost roosts at a 1:1 ratio. Replacement roosts will be placed at the discretion of the qualified biologist.

Level of Significance after Mitigation: Less than Significant

b. *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?*

While there are numerous watercourses on the Project site of varying classification, none contain adjacent riparian habitat. Furthermore, site surveys conducted in September 2020 determined that no sensitive communities occur within the Project site. Therefore, Project activities will not impact riparian habitat or other sensitive natural communities.

Level of Significance before Mitigation: No Impact

c. Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

7.2.2 Impact BIO-2. Riparian Habitat and Waters of the United States/State

The bed, bank, and channel of the ephemeral and intermittent drainages within the Property are subject to CDFW jurisdiction under Section 1600 of CFGC; while riparian habitat was not observed on the Property, the extent of riparian vegetation surrounding these features would also be subject to CDFW jurisdiction if found. These features may also be considered waters of the State by the RWQCB/SWQCB, pursuant to the CWA. There are several ephemeral drainage features located within the parcel slated for cannabis production; however, all watercourses within the Project site will be avoided completely. As discussed above, the SWQCB requires watercourse setbacks to be implemented for cannabis production projects.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

BIO-2a: Implement County and State Ordinances for Riparian/Creek Setbacks

The Project proponent should implement the required creek and riparian setbacks as described in the Lake County Code of Ordinances and SWQCB General Order for Cannabis Activities. Chapter 30, Section 9 of the Lake County Code of Ordinances requires a watercourse corridor setback to ensure potentially significant effects to the channel are avoided. The setback distance is based on the watercourse classification and on the severity of the erosion hazard rating, which is determined by soil type. Soil types within the Project site vary between slight, moderate, and severe erosion hazard, and therefore a setback of 50 to 100 feet for Class II watercourses (ephemeral drainages) and 20 to 50 feet for Class III watercourses (intermittent stream) will be required. Additionally, SWQCB designates a 100-foot setback for Class II watercourses and 50-foot setback for Class III watercourses impacted by cannabis projects.

BIO-2b: Implement Best Management Practices

Sediment migration and discharge from the work site into the on-site ephemeral drainages or intermittent stream, and consequently the off-site creeks they are tributary to, shall be mitigated by implementation of BMPs. Standard BMPs include, but are not limited to, the placement of silt fence or straw wattles between active work areas or materials stockpiles and active waterways, covering all materials stockpiles with visqueen or similar materials during windy conditions (winds greater than 15 mph) or when a greater than 50% chance of rainfall is predicted within a 72-hour period.

Level of Significance after Mitigation: Less than Significant

d. Would the Project 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?

Active construction may temporarily interfere with the movement of native wildlife within adjacent wildlife corridors; however, no permanent dispersal or migration barriers will occur as a result of the proposed Project. Cannabis cultivation and related disturbances are limited to the canopy areas, therefore leaving most of the Project site as open space available for wildlife movement. In addition, the proposed Project will have no adverse effects to fish movement in ephemeral and intermittent drainages, as these features do not provide suitable habitat to support fish.

Level of Significance before Mitigation: Less than Significant

e. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

7.2.3 Impact BIO-3. Lake County Cannabis Ordinance 3084

Lake County Cannabis Ordinance 3084, Section 4, Subsection iii) Prohibited Activities (a) Tree Removal, described in detail in Section 4.3.1.2 above, restricts the removal of commercial tree species and any true oak species for the purpose of developing a cannabis cultivation site. If tree removal is expected to take place, the Project may conflict with this ordinance.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

<u>BIO-3a: Implement Tree Protection/Mitigation</u>

Avoid impacting or removing protected trees and true oak species. If any protected or true oak trees are proposed for removal, the Project proponent should procure a tree survey and arborist report. Lake County requires mitigation for the removal of protected trees; typical mitigation is tree replacement at a ratio of 2:1 or 3:1.

f. Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project does not conflict with any Habitat Conservation Plans, Natural Community Conservation Plans, or the Lake County General Plan. The Project site does not fall within the coverage area of any adopted HCPs or NCCPs.

Level of Significance before Mitigation: No Impact

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Table 3. Complete List of Observed Plant Species on the High Valley Ranch Project Site.

Scientific Name	Common Name	Family	Native
Achillea millefolium	yarrow	Asteraceae	Y
Acmispon americanus var. *americanus*	Spanish lotus	Fabaceae	Y
Adenostoma fasciculatum var. *fasciculatum*	chamise	Roasaceae	Y
Aesculus californica	California buckeye	Sapindaceae	Y
Agoseris grandiflora	giant mountain dandelion	Asteraceae	Y
Allium spp.	onion	Alliaceae	Y
Amarathus blitoides	prostrate amaranth	Amaranthaceae	Y
Arbutus menziesii	madrone	Ericaceae	Y
Arctostaphylos glauca	bigberry manzanita	Ericaceae	Y
Arctostaphylos manzanita	common manzanita	Ericaceae	Y
Artemesia douglasiana	Douglas' mugwort	Asteraceae	Y
Asclepias eriocarpa	Indian milkweed	Apocynaceae	Y
Asclepias fascicularis	narrowleaf milkweed	Apocynaceae	Y
Avena fatua	wild oats	Poaceae	N
Baccharis pilularis	coyote brush	Asteraceae	Y
Brodiaea spp.	brodiaea	Themidaceae	Y
Bromus diandrus	ripgut brome	Poaceae	N
Bromus madritensis ssp. *rubens*	red brome	Poaceae	N
Carduus pycnocephalus	Italian thistle	Asteraceae	N
Centaurea solstitialis	yellow star thistle	Asteraceae	N
Centromadia fitchii	spikeweed	Asteraceae	Y
Centromadia pungens	common spikeweed	Asteraceae	Y
Cercis occidentalis	western redbud	Fabaceae	Y
Cercocarpus betuloides	birchleaf mountain mahogany	Rosaceae	Y
Chenopodium vulvaria	stinking goosefoot	Amaranthaceae	N
Chicorum intybus	chicory	Asteraceae	N
Cirsium vulgare	bull thistle	Asteraceae	N
Clarkia spp.	clarkia	Onagraceae	Y
Clematis lasiantha	pipestems	Ranunculaceae	Y
Convolvulus arvensis	field bindweed	Convolvulaceae	N
Croton setiger	turkey mullein	Euphorbiaceae	Y
Crypsis schoenoides	swamp picklegrass	Poaceae	N

Scientific Name	Common Name	Family	Native
Cynodon dactylon	common bermudagrass	Poaceae	N
Cynosurus echinatus	dogstail grass	Poaceae	N
Daucus carota	Queen Anne's lace	Apiaceae	N
Digitaria sanguinalis	crabgrass	Poaceae	N
Diplacus aurantiacus	sticky bush monkeyflower	Phrymaceae	Y
Dysphania pumilio	clammy goosefoot	Amaranthaceae	N
Eleocharis macrostachya	common spikerush	Juncaceae	Y
Elymus caput-medusae	medusahead	Poaceae	N
Epilobium ciliatum ssp. *ciliatum*	fringed willowherb	Onagraceae	Y
Erigeron canadensis	Canada horseweed	Asteraceae	Y
Erigeron petrophilus var. *petrophilus*	cliff fleabane	Asteraceae	Y
Eriodictyon californica	California yerba santa	Boraginaceae	Y
Eriogonum nudum	naked buckwheat	Polygonaceae	Y
Eriogonum spp.	buckwheat	Polygonaceae	Y
Eriophyllum lanatum	wooly sunflower	Asteraceae	Y
Eschscholzia californica	California poppy	Papavercaea	Y
Festuca perennis	Italian ryegrass	Poaceae	N
Festuca spp.	fescue	Poaceae	-
Frangula californica	California coffeeberry	Rhamnaceae	Y
Gastridium phleoides	nit grass	Poaceae	N
Grindelia hirsutula	gumweed	Asteraceae	Y
Heliotropium europaeum	European heliotrope	Boraginaceae	N
Hemizonia congesta ssp. *luzulifolia*	hayfield tarweed	Asteraceae	Y
Heteromeles arbutifolia	toyon	Rosaceae	Y
Hirschfeldia incana	shortpod mustard	Brassicaceae	N
Hypochaeris glabra	smooth cat's-ear	Asteraceae	N
Hypochaeris radicata	rough cat's-ear	Asteraceae	N
Juglans regia	English walnut	Juglandaceae	N*
Juncus balticus	Baltic rush	Juncaceae	Y
Juncus bufonius	toad rush	Juncaceae	Y
Juncus effusus	common bog rush	Juncaceae	Y
Kickxia elatine	fluellin	Plantaginaceae	N
Lactuca serriola	prickly lettuce	Asteraceae	N

Scientific Name	Common Name	Family	Native
Lactuca saligna	willow lettuce	Asteraceae	N
Lactuca virosa	poison lettuce	Asteraceae	N
Mentha pulegium	pennyroyal	Lamiaceae	N
Micropus californicus	Q-tips	Asteraceae	Y
Panicum spp.	panicgrass	Poaceae	N
Phalaris aquatica	Harding grass	Poaceae	N
Pinus sabiniana	California foothill pine	Pinaceae	Y
Plantago lanceolata	lanceleaf plantain	Plantaginaceae	N
Polygonum aviculare	common knotweed	Polygonaceae	N
Populus fremontii	Fremont's cottonwood	Salicaceae	Y
Quercus agrifolia	coast live oak	Fagaceae	Y
Quercus chrysolepis	canyon live oak	Fagaceae	Y
Quercus douglasii	blue oak	Fagaceae	Y
Quercus lobata	valley oak	Fagaceae	Y
Quercus wislizeni	interior live oak	Fagaceae	Y
Rhamnus ilicifolia	evergreen buckthorn	Rhamnaceae	Y
Rumex crispus	curly dock	Polygonaceae	N
Rumex pulcher	clustered dock	Polygonaceae	N
Salix laevigata	red willow	Salicaceae	Y
Sedum spathulifolium	broadleaf stonecrop	Crassulaceae	Y
Sisymbrium spp.	hedge mustard	Brassicaceae	N
Spergularia rubra	red sandspurry	Caryophyllaceae	N
Stachys spp.	hedgenettle	Lamiaceae	N
Stephanomaria virgata	wireweed	Asteraceae	Y
Stipa pulchra	purple needlegrass	Poaceae	Y
Toxicodendron diversilobum	poison oak	Anacardiaceae	Y
Trichostema laceolatum	vinegarweed	Lamiaceae	Y
Trichostema laxum	turpentine weed	Lamiaceae	Y
Trifolium glomeratum	clustered clover	Fabaceae	N
Trifolium fragiferum	strawberry clover	Fabaceae	N
Trifolium hirtum	rose clover	Fabaceae	N
Triteleia laxa	Ithuriel's spear	Themidaceae	Y
Typha latifolia	broadleaf cattail	Typhaceae	N

Scientific Name	Common Name	Family	Native
Urtica dioica	stinging nettle	Urticaceae	Y
Verbascum blatteria	moth mullein	Scrophulariaceae	N
Verbascum thapsus	wooly mullein	Scrophulariaceae	N
Verbena lasiostachys	western vervain	Verbanaceae	Y
Vicia villosa	hairy vetch	Fabaceae	N
Wyethia mollis	mule's ears	Asteraceae	Y
Xanthium strumarium	rough cockleburr	Asteraceae	Y
Zeltnera muehlenbergii	Muehlenberg's centaury	Gentianaceae	Y

Table 4. Complete List of Observed Wildlife Species on the High Valley Ranch Project Site.

Scientific Name	Common Name	Family	Native
Mammals			
Canis latrans	coyote	Canidae	Y
Didelphis virginiana	Virginia opossum	Didelphidae	Y
Mephitis mephitis	striped skunk	Mephitidae	Y
Microtus spp.	vole	Muridae	Y
Odocoileus hemionus	black-tailed deer	Cervidae	Y
Urocyon cinereoargenteus	gray fox	Canidae	Y
Birds			
Accipiter cooperi	Cooper's hawk	Accipitridae	Y
Aphelocoma californica	California scrub-jay	Corvidae	Y
Anthus rubescens	American pipit	Motacillidae	Y
Baeolophus inornatus	oak titmouse	Paridae	Y
Branta canadensis	Canada goose	Anatidae	Y
Bubo virginianus	great horned owl	Strigidae	Y
Buteo jamaicensis	red-tailed hawk	Accipitridae	Y
Callipepla californica	California quail	Odontophoridae	Y
Calypte anna	Anna's hummingbird	Trochilidae	Y
Cardellina pusilla	Wilson's warbler	Parulidae	Y
Cathartes aura	turkey vulture	Cathartidae	Y
Circus hudsonius	northern harrier	Accipitridae	Y
Colaptes aura	northern flicker	Picidae	Y
Corvus brachyrhynchos	American crow	Corvidae	Y
Corvus corax	common raven	Corvidae	Y
Dryobates nuttallii	Nuttall's woodpecker	Picidae	Y
Euphagus cyanocephalus	Brewer's blackbird	Icteridae	Y
Falco sparverius	American kestrel	Falconidae	Y
Haemorhous mexicanus	house finch	Fringillidae	Y
Meleagris gallopavo	wild turkey	Phasianidae	Y
Melanerpes formicivorus	acorn woodpecker	Picidae	Y
Melozone crissalis	California towhee	Passerellidae	Y
Passer domesticus	house sparrow	Passeridae	N
Passerculus sandwichensis	savannah sparrow	Passerellidae	Y

Scientific Name	Common Name	Family	Native
Pipilo maculatus	spotted towhee	Passerellidae	Y
Psaltriparus minimus	bushtit	Aegithalidae	Y
Sayornis nigricans	black phoebe	Tyrannidae	Y
Sayornis sayi	Say's phoebe	Tyrannidae	Y
Setophaga coronata	yellow-rumped warbler	Parulidae	Y
Setophaga nigrescens	black-throated gray warbler	Parulidae	Y
Setophaga petechia	yellow warbler	Parulidae	Y
Setophaga townsendi	Townsend's warbler	Parulidae	Y
Sialia mexicana	western bluebird	Turdidae	Y
Sitta canadensis	red-breasted nuthatch	Sittidae	Y
Sitta carolinensis	white-breasted nuthatch	Sittidae	Y
Spinus psaltria	lesser goldfinch	Fringillidae	Y
Sturnella neglecta	western meadowlark	Icteridae	Y
Sturnis vulgaris	European starling	Sturnidae	N
Tachycineta bicolor	tree swallow	Hirudinidae	Y
Turdus migratorius	American robin	Turdidae	Y
Tyto alba	barn owl	Tytonidae	Y
Zenaida macroura	mourning dove	Columbidae	Y
Zonotrichia atricapilla	golden-crowned sparrow	Passerellidae	Y
Zonotrichia leucophrys	white-crowned sparrow	Passerellidae	Y
Reptiles and Amphibians			
Lithobates catesbeianus	American bullfrog	Ranidae	N
Sceloporus occidentalis	western fence lizard	Phrynosomatidae	Y

Attachment A.

Preliminary Site Plan

HIGH VALLEY RANCH -
CANNABIS CULTIVATION FACILITY

11650 HIGH VALLEY ROAD
CLEARLAKE OAKS, CA 95423

PROJECT TEAM

CIVIL ENGINEER
FAREED PITTALWALA, PE
KIMLEY-HORN AND ASSOCIATES, INC.
555 CAPITOL MALL, SUITE 300
SACRAMENTO, CA 95814
(916) 858-5800
FAREED.PITTALWALA@KIMLEY-HORN.COM

OWNER
ADE MUTUAL INC.
11315 TREYBURN WAY
SAN DIEGO, CA 92131

LEGEND

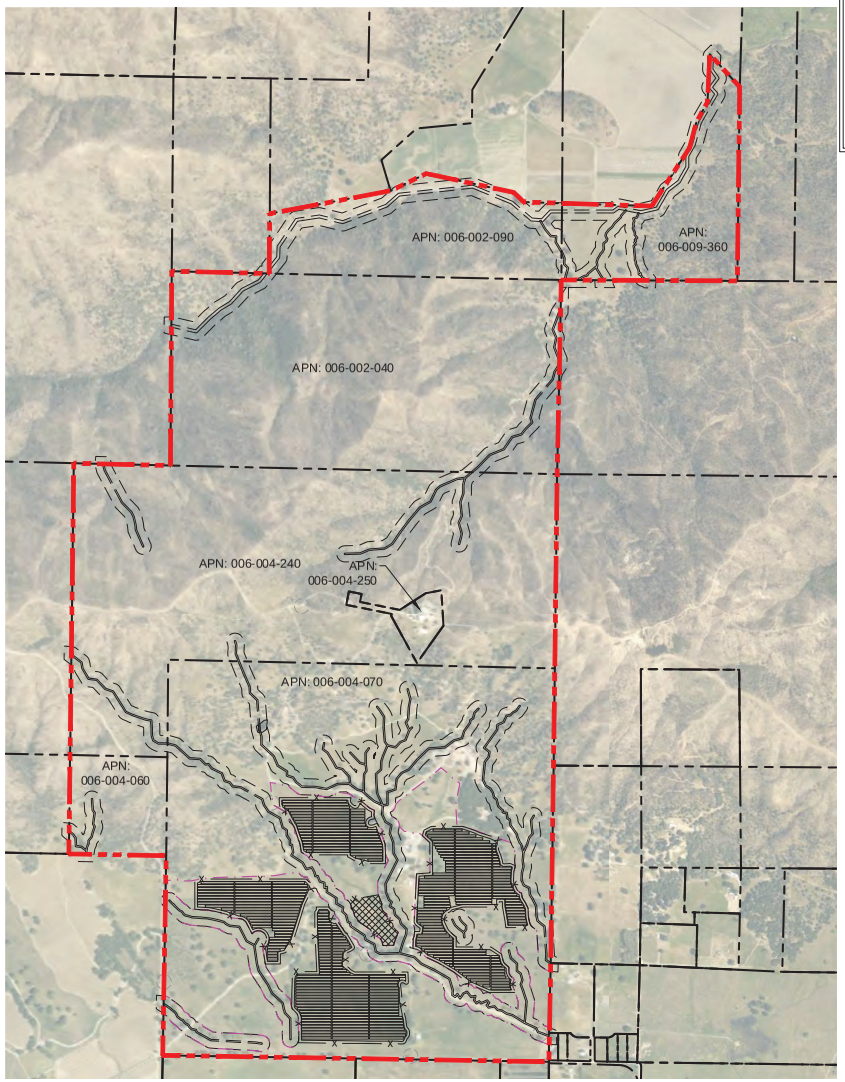
- PROPERTY LINE
- PROJECT BOUNDARY
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- CULTIVATION CANOPY AREA NOT TO EXCEED 80 ACRES
- PROPOSED NURSERY AREA, APPROXIMATELY 5.5 ACRES
- EXISTING WELL LOCATION WITH 100' SETBACK
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION

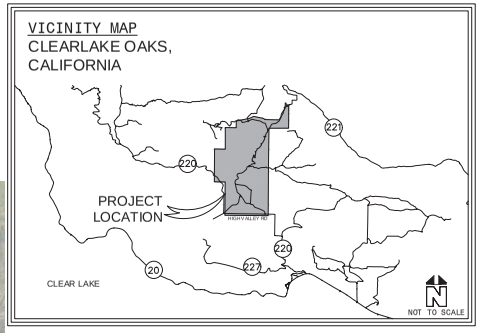
ABBREVIATIONS

APN	– ASSESSOR PARCEL NUMBER
AC	– ACRE
P/L	– PROPERTY LINE
R/W	– RIGHT-OF-WAY

SITE INFORMATION

SITE ADDRESS:	11650 HIGH VALLEY ROAD CLEARLAKE OAKS, CA 95423
APN(S):	006-002-090, 006-004-25, 006-004-240, 006-002-040, 006-002-090, 006-009-360
TOTAL SITE AREA:	1,643.53 ACRES
PROPOSED PLANTING BED AREA:	80 ACRES
PROPOSED NURSERY:	5.5 ACRES
PROPOSED PARKING SPACES:	65





VICINITY MAP
SCALE: NTS

SHEET INDEX

NORTH

GRAPHIC SCALE IN FEET
0 400 800 1600

811 Know what's below. Call before you dig.

NO.	REVISIONS	DATE

PREPARED FOR:
ADE MUTUAL, INC
11315 TREYBURN WAY
SAN DIEGO, CA 92131

PREPARED BY:
Kimley»Horn
555 CAPITOL MALL, SUITE 300
SACRAMENTO, CA 95814
PHONE: 916-858-5800
WWW.KIMLEY-HORN.COM

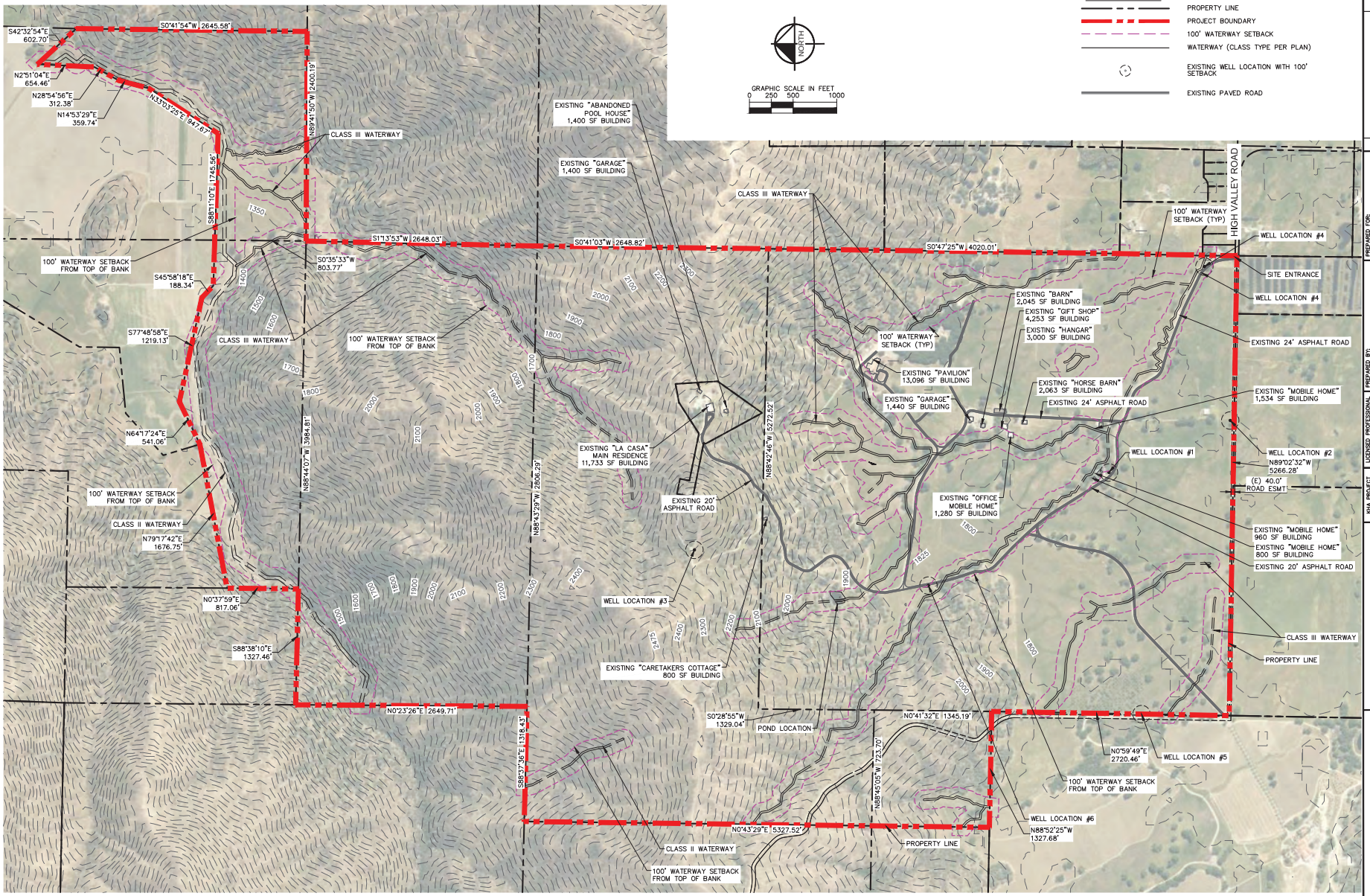
LICENSED PROFESSIONAL ENGINEER
FAREED PITTALWALA
No. 92862
REGISTERED PROFESSIONAL ENGINEER
CIVIL
STATE OF CALIFORNIA

KHA PROJECT	197400001
DATE	10/13/2020
SCALE AS SHOWN	
DESIGNED	GM
DRAWN	SM
CHECKED	FP

COVER SHEET

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER
C1.0



PREPARED FOR: ADE MUTUAL, INC
11315 RECUERDO WAY
SAN DIEGO, CA 92131

PREPARED BY: Kimley»Horn

555 CAPITOL MALL, SUITE 300
SACRAMENTO, CA 95814
PHONE: 916-858-5800
WWW.KIMLEY-HORN.COM

LICENSED PROFESSIONAL ENGINEER — REGISTERED PROFESSIONAL ENGINEER — No. C068621 — CIVIL — STATE OF CALIFORNIA

KHA PROJECT	197400001
DATE	10/13/2020
SCALE AS SHOWN	
DESIGNED	GM
DRAWN	SM
CHECKED	FP

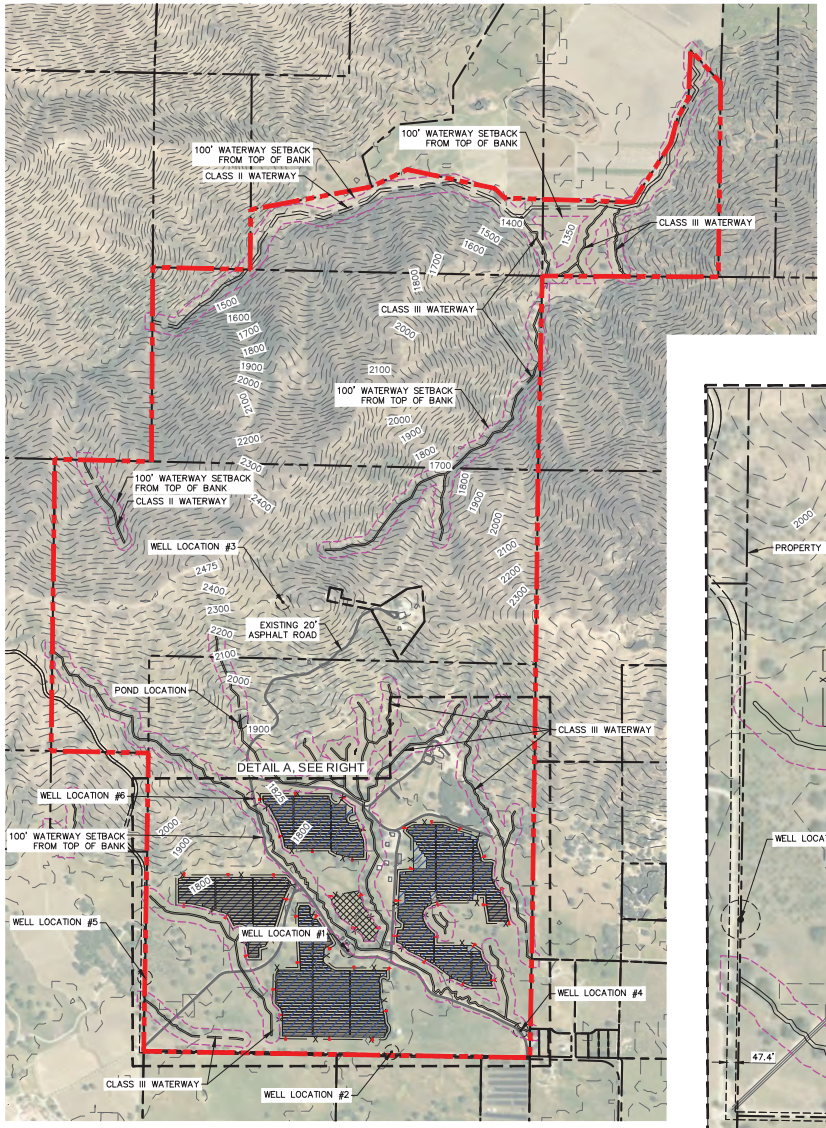
No.	REVISIONS	DATE

EXISTING CONDITION

HIGH VALLEY RANCH

LAKE COUNTY, CA

SHEET NUMBER C2.0

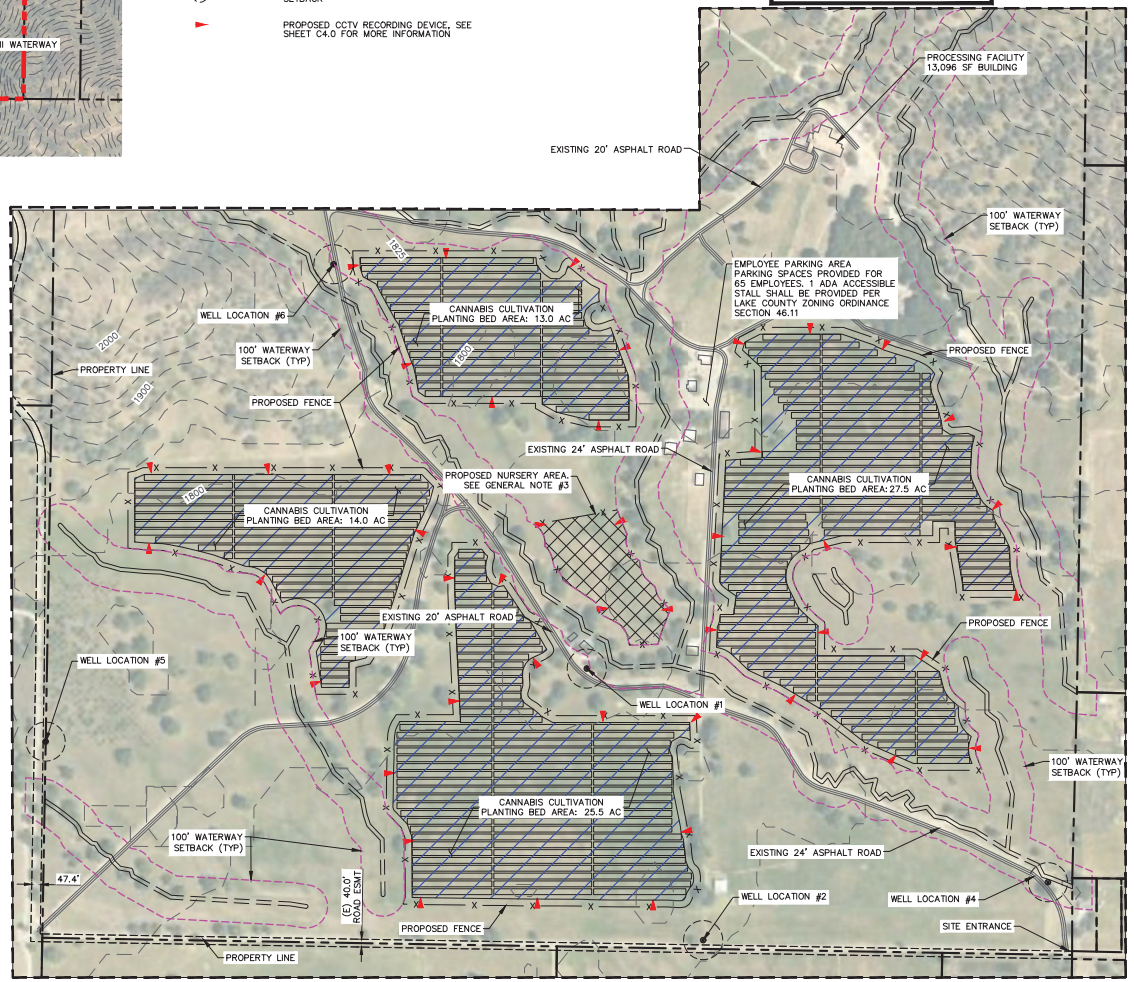


LEGEND

- PROPERTY LINE
- PROJECT BOUNDARY
- 100' WATERWAY SETBACK
- WATERWAY (CLASS TYPE PER PLAN)
- SECURITY FENCE
- CULTIVATION CANOPY AREA NOT TO EXCEED 80 ACRES
- PROPOSED NURSERY AREA, APPROXIMATELY 5.5 ACRES
- EXISTING WELL LOCATION WITH 100' SETBACK
- PROPOSED CCTV RECORDING DEVICE, SEE SHEET C4.0 FOR MORE INFORMATION

GENERAL NOTES

1. NO GRADING PROPOSED FOR THE PROPOSED PROJECT AREA.
2. NO FERTILIZER OR PESTICIDE USE SHALL BE LOCATED WITHIN 100' OF ANY SPRING, TOP OF BANK OF ANY CREEK OR SEASONAL STREAM, EDGE OF LAKE, DELINEATED WETLAND OR VERNAL POOL.
3. NURSERY AREA FOR IMMATURE PLANTS ONLY. NO MATURE, FLOWERING PLANTS WILL BE LOCATED WITHIN THE AREA.



DETAIL A

PREPARED FOR: ADE MUTUAL, INC
11315 RANCHO BERNARDO WAY
SAN DIEGO, CA 92127

PREPARED BY: Kimley»Horn
555 CAPITOL MALL, SUITE 300
SACRAMENTO, CA 95814
PHONE: 916-858-5800
WWW.KIMLEY-HORN.COM

LICENSED PROFESSIONAL ENGINEER — REGISTERED PROFESSIONAL ENGINEER — FRANCES S. PITALWALA — No. C088624 — CIVIL — STATE OF CALIFORNIA

KHA PROJECT	197400001
DATE	10/13/2020
SCALE AS SHOWN	
DESIGNED	GM
DRAWN	SM
CHECKED	FP

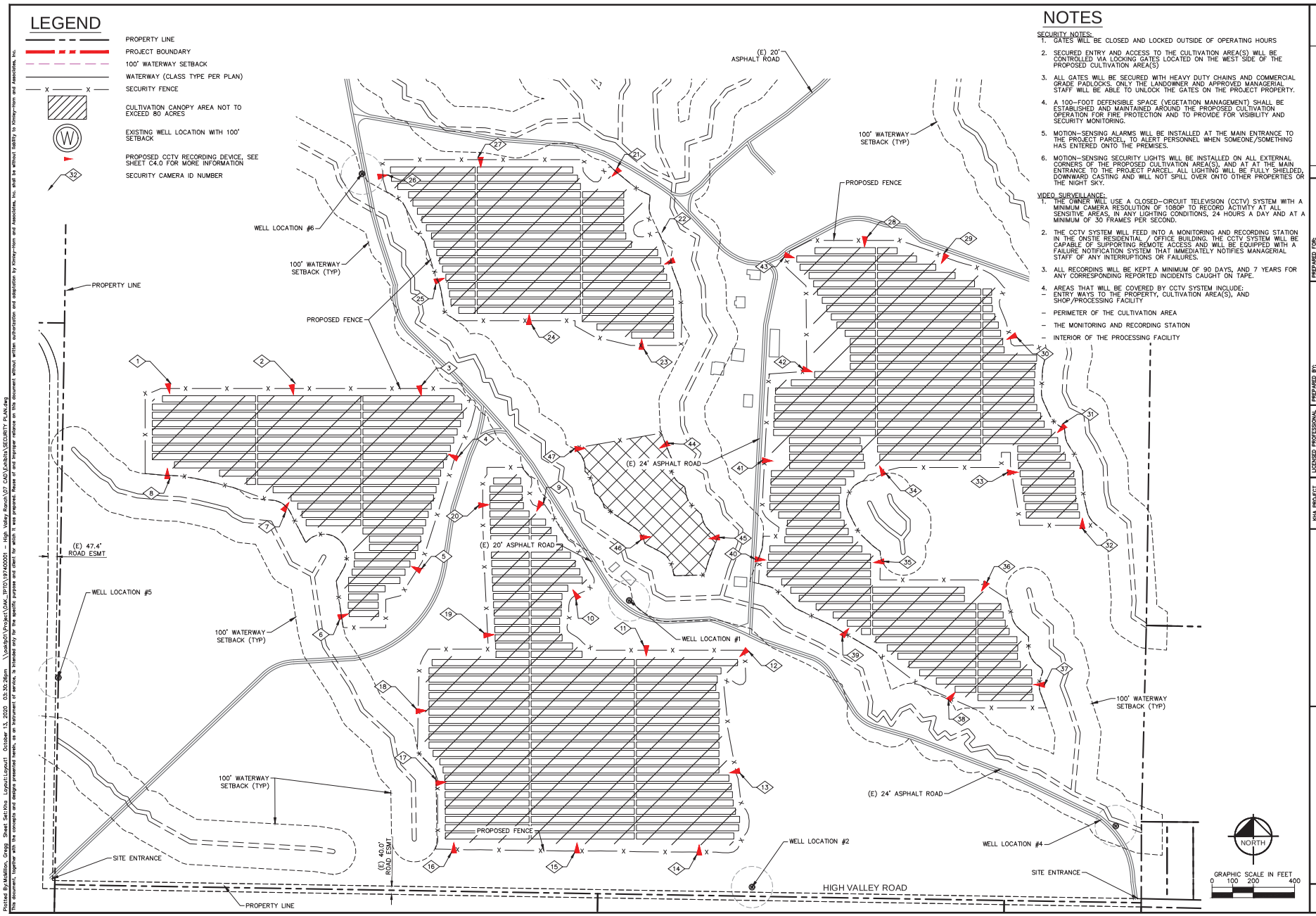
NO.	REVISIONS	DATE

PROPOSED SITE PLAN

HIGH VALLEY RANCH

LAKE COUNTY, CA

SHEET NUMBER C3.0



PREPARED FOR: ADE MUTUAL, INC
11315 RECKLESS WAY SAN DIEGO, CA 92131

PREPARED BY: Kimley»Horn
555 CAPITOL MALL, SUITE 300 SACRAMENTO, CA 95814 PHONE: 916-858-5800 WWW.KIMLEY-HORN.COM

LICENSED PROFESSIONAL ENGINEER — REGISTERED PROFESSIONAL ENGINEER — No. C088624 — CIVIL — STATE OF CALIFORNIA

KHA PROJECT	197400001
DATE	10/13/2020
SCALE AS SHOWN	
DESIGNED	GM
DRAWN	SM
CHECKED	FP

NO.	REVISIONS	DATE

SECURITY PLAN

HIGH VALLEY RANCH
LAKE COUNTY, CA

SHEET NUMBER C4.0

Attachment B.

USFWS Draft Information for Planning and Consultation System Report

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Lake County, California

Local offices

Arcata Fish And Wildlife Office

(707) 822-7201
(707) 822-8411

1655 Heindon Road
Arcata, CA 95521-4573

Sacramento Fish And Wildlife Office

(916) 414-6600
(916) 414-6713

Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information.
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS

Northern Spotted Owl Strix occidentalis caurina There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/1123	Threatened

Amphibians

NAME	STATUS
California Red-legged Frog Rana draytonii There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/2891	Threatened

Fishes

NAME	STATUS
Delta Smelt Hypomesus transpacificus There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/321	Threatened

Flowering Plants

NAME	STATUS
Burke's Goldfields Lasthenia burkei No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4338	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Aug 31

Golden Eagle Aquila chrysaetos — Breeds Jan 1 to Aug 31
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
https://ecos.fws.gov/ecp/species/1680

Lawrence's Goldfinch Carduelis lawrencei — Breeds Mar 20 to Sep 20
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

Nuttall's Woodpecker Picoides nuttallii — Breeds Apr 1 to Jul 20
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9410

Oak Titmouse Baeolophus inornatus — Breeds Mar 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9656

Spotted Towhee Pipilo maculatus clementae — Breeds Apr 15 to Jul 20
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/4243

Wrentit Chamaea fasciata — Breeds Mar 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Yellow-billed Magpie Pica nuttalli — Breeds Apr 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9726

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

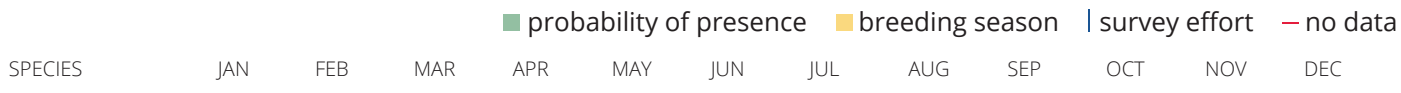
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

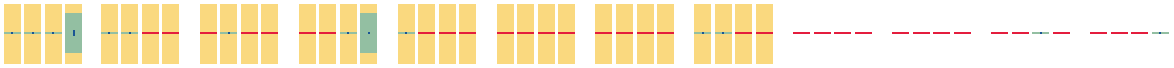
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Bald Eagle
Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Golden Eagle
Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

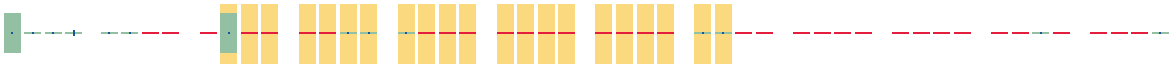
Lawrence's Goldfinch
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Nuttall's Woodpecker
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Oak Titmouse
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Spotted Towhee
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Wrentit
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Yellow-billed Magpie
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ “What does IPaC use to generate the migratory birds potentially occurring in my specified location”. Please be aware this report provides the “probability of presence” of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to

confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER EMERGENT WETLAND

- PEM1A

FRESHWATER POND

- PUSC
- PUBK

RIVERINE

- R4SBC
- R4SBA

R5UBF
R5UBFx

A full description for each wetland code can be found at the National Wetlands Inventory website

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Attachment C.

NMFS Online Species List Query Report

Quad Name **Clearlake Oaks**
Quad Number **39122-A6**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) -
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Appendix C

SWRCB Notice of Receipt

CALIFORNIA Water Boards

State Water Resources Control Board

GAVIN NEWSOM GOVERNOR

JARED BLUMENFELD SECRETARY FOR ENVIRONMENTAL PROTECTION

Cannabis General Order Application Number: 429205
Fee Payment Application Number: BA50429205

Self-Certifcation Date: 09/29/2020

NOTICE OF RECEIPT

STATE WATER RESOURCES CONTROL BOARD
GENERAL WASTE DISCHARGE REQUIREMENTS AND WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES OF WASTE ASSOCIATED WITH CANNABIS CULTIVATION ACTIVITIES

Your application for coverage under the Cannabis General Order has been received.

CDFA License

For dischargers seeking a cultivation license from CDFA, this Notice of Receipt is insufficient. Upon payment of your application fee (see Fee Payment section) and submittal of Native American tribal authorization (if needed; see Native American Tribe Authorization section below), you will receive a separate Notice of Applicability (NOA) to be used for obtaining a CDFA license.

Fee Payment

Within 30 calendar days of submitting your application, you must pay an application fee in order for your application to be complete.

Your fee category is: **Tier 2 Low Risk. Your application fee is $1,000.00.**

Fee's are reassessed on a yearly basis based on program revenue, expenses, and stakeholder input. You can review the current Water Boards Fee Schedule and stakeholder announcements by visiting the following website: https://www.waterboards.ca.gov/resources/fees/ (https://www.waterboards.ca.gov/resources/fees/).

The application fee can be paid using electronic funds transfer, a credit card, a check, money order, or cashier check.

- If you are paying via electronic funds transfer or credit card, visit the following website: http://www.waterboards.ca.gov/make_a_payment/ (http://www.waterboards.ca.gov/make_a_payment/). Include your Fee Payment Application Number when submitting your payment. Your Fee Payment Application Number can be found at the top right-hand corner of this Notice.
- If you are paying with a check, money order, or cashier check, make the check payable to the "State Water Resources Control Board", write the Fee Payment Application Number on the check, money order, or cashier check, and submit the payment to the following address:
  State Water Resources Control Board
  ATTN: Water Quality Fees - Cannabis General Order
  PO Box 1888

Sacramento, CA 95812-1888.

Instructions for Paying Application Fees by Cash:
All cash payments must be submitted directly to the State Water Resources Control Board (State Water Board), not the Regional Water Quality Control Board. The State Water Board is able to accept cash payments at its downtown Sacramento location. Cash payments, however, will require additional time and an appointment with the State Water Board Sacramento office. A delay in enrollment due to the need for a cash payment is not an excuse for non-compliance with applicable enrollment requirements. To schedule an appointment to make a cash payment, please call (916) 341-5021.

Technical Reports

In accordance with the Cannabis General Order, **you may have one or more technical reports due**. Below is the list of technical reports due based on your site conditions.

All technical reports shall be submitted electronically to the Central Valley Regional Water Board-Redding office at the following email address: centralvalleyredding@waterboards.ca.gov (mailto:centralvalleyredding@waterboards.ca.gov) and shall include "Cannabis General Order" in the email subject line and your WDID Number and the Cannabis General Order Application Number. Your WDID Number will be assigned upon issuance of the Notice of Applicability and the Cannabis General Order Application Number can be found on the top-right hand corner of this Notice. Refer to the Cannabis General Order for additional information regarding submittal of these technical reports.

Based on the information you provided, your site conditions are: Tier 2 Low Risk with a cultivation area greater than 1 acre and a slope less than or equal to 30 percent.

List of Technical Reports Due:
1) Site Management Plan - **due within 90 days of application submittal**
2) Nitrogen Management Plan - **due within 90 days of application submittal**

Compliance with Best Practicable Treatment or Control (BPTC) Measures

You have certified that your site qualifies as a Tier 2 Low Risk site and that you will complete improvements to achieve compliance by the onset of the winter period following submittal of this application. Winter period is defined in Attachment A of the Cannabis General Order.

Native American Tribe Authorization

This section does not apply to you.

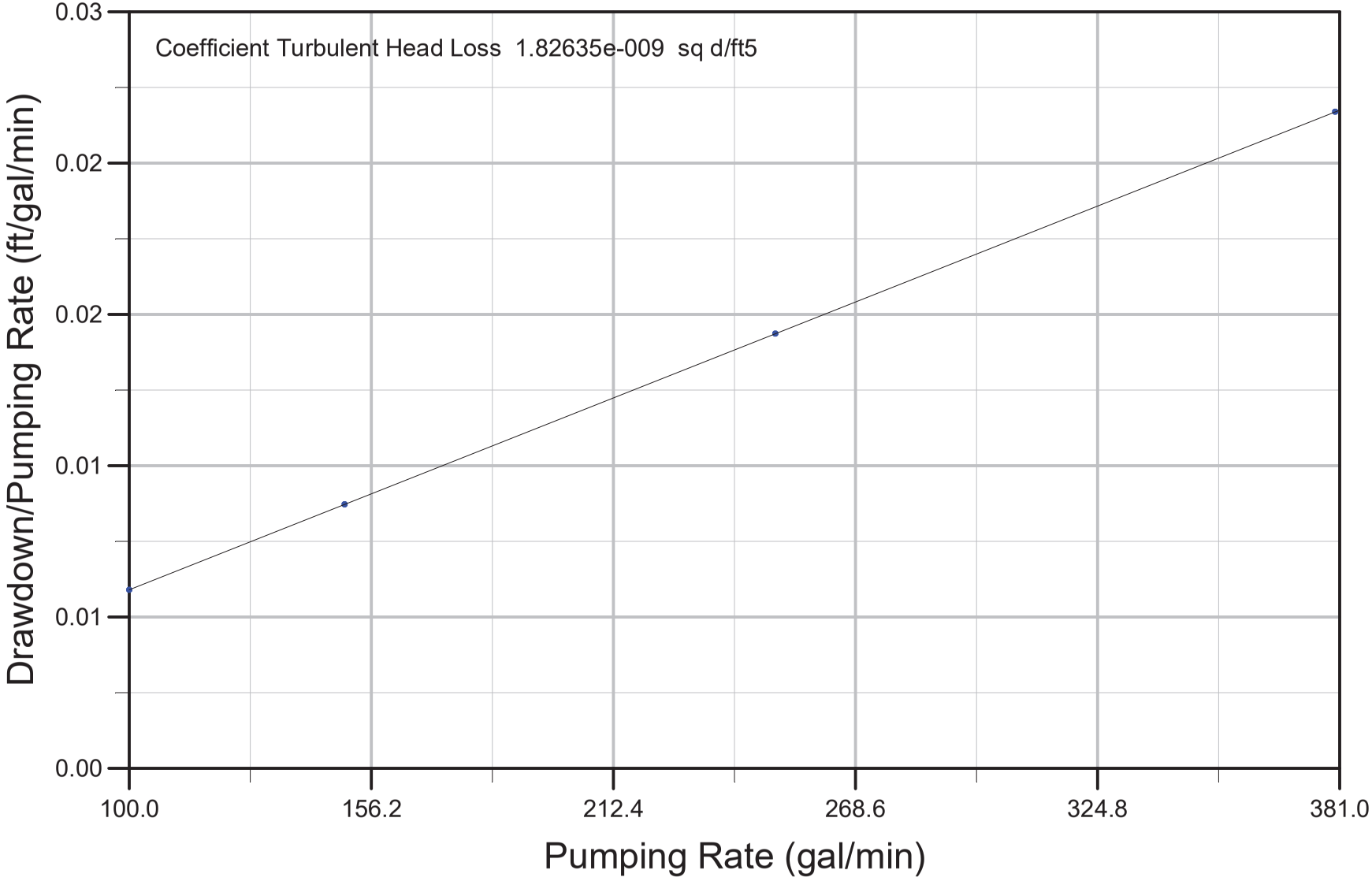
For additional information regarding your application, please contact the Central Valley Regional Water Board – Redding office. Current contact information for the Central Valley Regional Water Board – Redding office:
364 Knollcrest Drive, Suite 205
Redding, CA 96002
(530) 224-4845
centralvalley.cannabis@waterboards.ca.gov (mailto:centralvalley.cannabis@waterboards.ca.gov)

If you notice any errors in your application, please contact the Central Valley Regional Water Board – Redding office for more information on providing the correct information. **Do not resubmit your application or begin a new application for the purposes of correcting errors, unless you are instructed to do so by the State Water Board or Regional Water Board.**

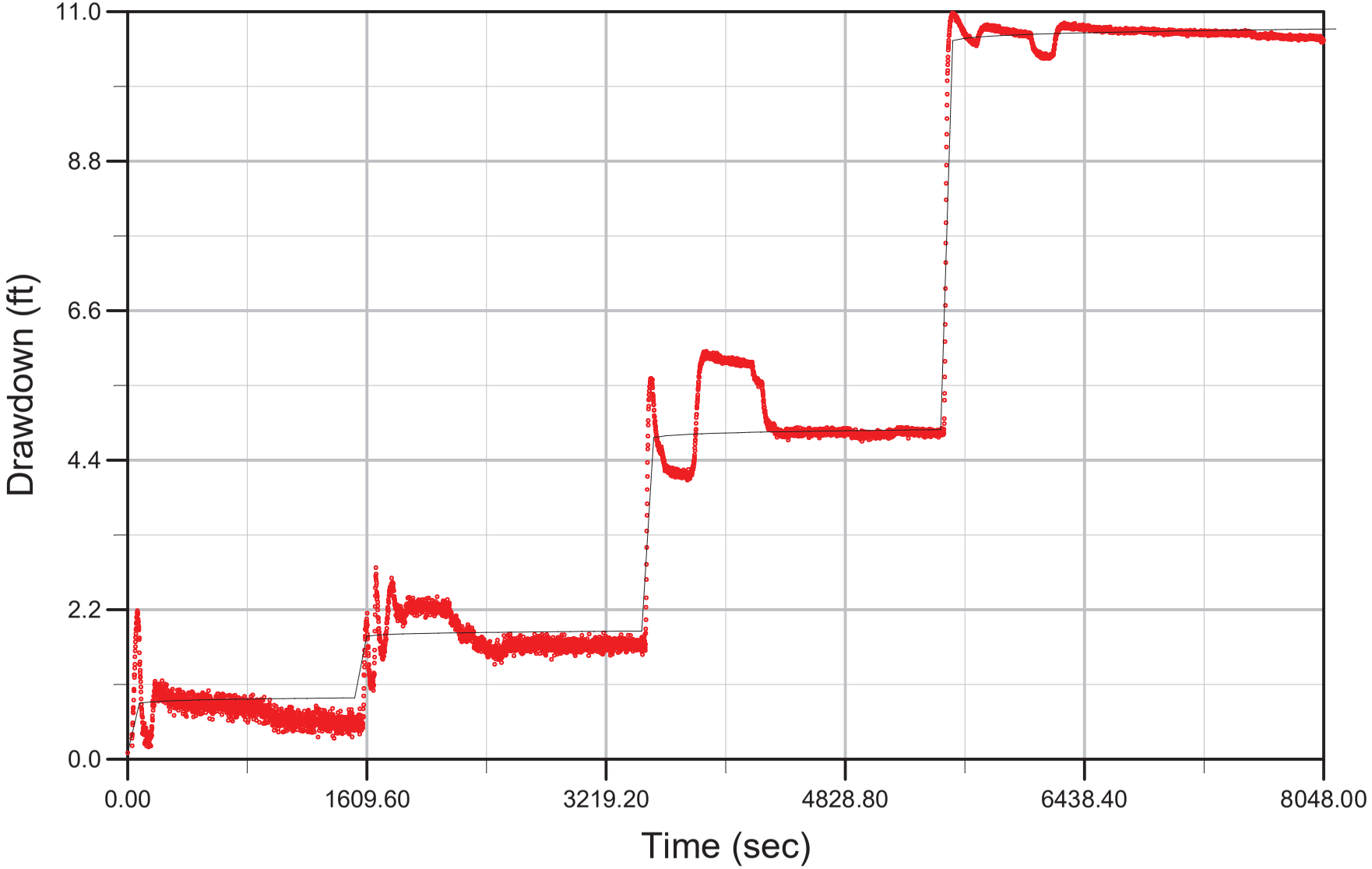
Appendix D

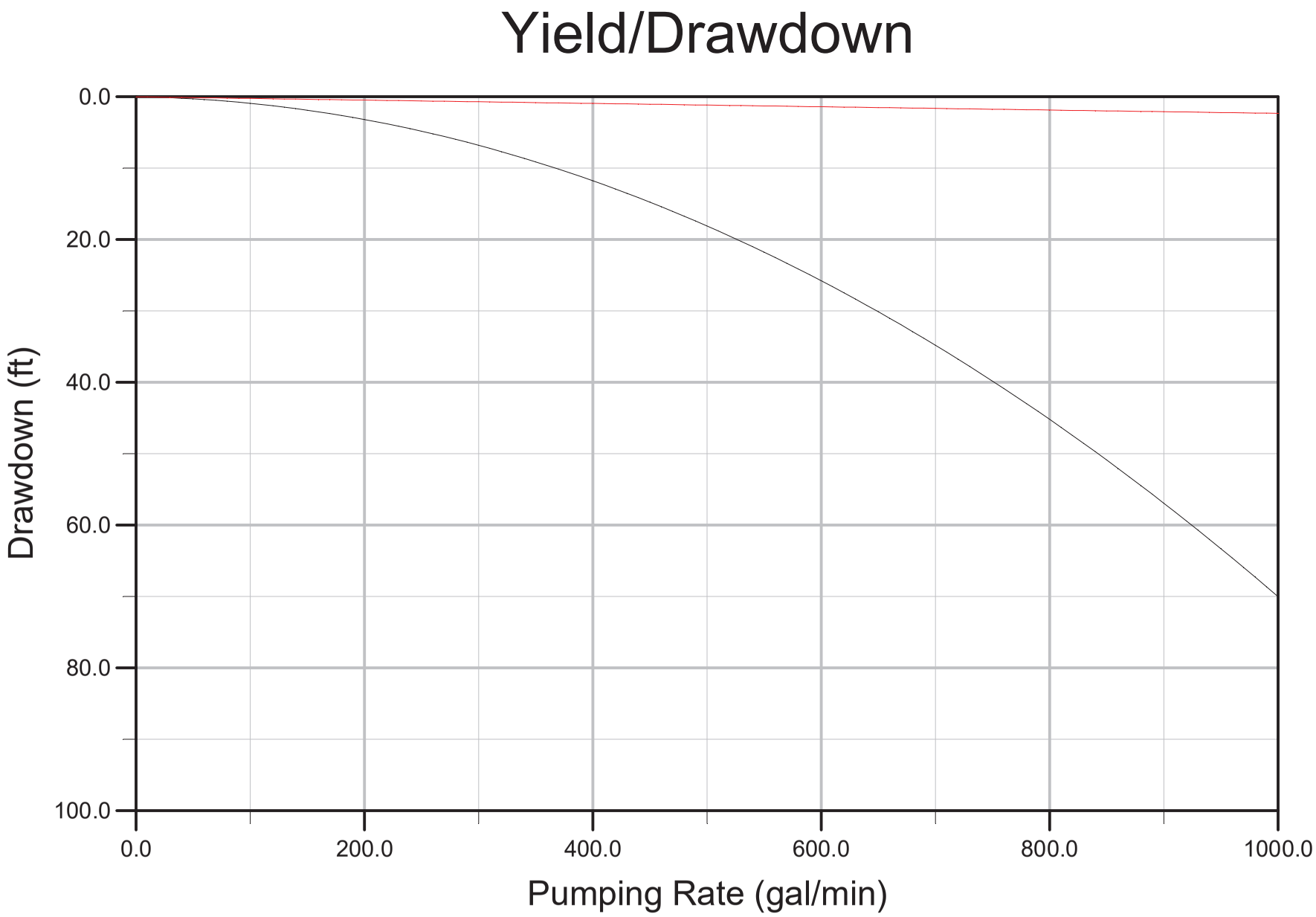
Draw Down Test Results

Eden and Hazel - Step 2



Predicted Well Response




Yield/Drawdown
0.0
20.0
40.0
60.0
80.0
100.0
Drawdown (ft)
0.0
200.0
400.0
600.0
800.0
1000.0
Pumping Rate (gal/min)

	Time (sec)	Drawdown (ft)
1	1	0.096
2	29	0.311
3	30	0.364
4	31	0.198
5	32	0.349
6	33	0.37
7	34	0.538
8	35	0.509
9	36	0.694
10	37	0.746
11	38	0.75
12	39	0.685
13	40	0.764
14	41	0.872
15	42	1.01
16	43	1.032
17	44	1.009
18	45	1.244
19	46	1.206
20	47	1.344
21	48	1.243
22	49	1.4
23	50	1.507
24	51	1.598
25	52	1.66
26	53	1.73
27	54	1.794
28	55	1.792
29	56	1.851
30	57	1.907
31	58	2
32	59	1.932
33	60	2.015
34	61	2.087
35	62	2.097
36	63	2.08
37	64	2.152
38	65	2.073
39	66	2.163
40	67	2.187
41	68	2.132
42	69	2.147
43	70	2.064
44	71	2.062
45	72	2.017
46	73	2.023
47	74	1.966

	Time (sec)	Drawdown (ft)
48	75	1.927
49	76	1.945
50	77	1.906
51	78	1.763
52	79	1.789
53	80	1.566
54	81	1.402
55	82	1.392
56	83	1.437
57	84	1.269
58	85	1.312
59	86	1.219
60	87	1.205
61	88	1.143
62	89	1.066
63	90	0.992
64	91	0.888
65	92	0.757
66	93	0.807
67	94	0.739
68	95	0.742
69	96	0.655
70	97	0.702
71	98	0.628
72	99	0.545
73	100	0.38
74	101	0.618
75	102	0.538
76	103	0.404
77	104	0.38
78	105	0.447
79	106	0.473
80	107	0.464
81	108	0.455
82	109	0.461
83	110	0.465
84	111	0.36
85	112	0.418
86	113	0.425
87	114	0.528
88	115	0.24
89	116	0.401
90	117	0.227
91	118	0.429
92	119	0.415
93	120	0.275
94	121	0.452

	Time (sec)	Drawdown (ft)
95	122	0.243
96	123	0.462
97	124	0.46
98	125	0.348
99	126	0.404
100	127	0.248
101	128	0.195
102	129	0.357
103	130	0.24
104	131	0.289
105	132	0.272
106	133	0.306
107	134	0.291
108	135	0.4
109	136	0.404
110	137	0.399
111	138	0.325
112	139	0.402
113	140	0.348
114	141	0.18
115	142	0.24
116	143	0.305
117	144	0.334
118	145	0.384
119	146	0.223
120	147	0.281
121	148	0.314
122	149	0.226
123	150	0.331
124	151	0.203
125	152	0.31
126	153	0.334
127	154	0.357
128	155	0.35
129	156	0.195
130	157	0.413
131	158	0.397
132	159	0.324
133	160	0.348
134	161	0.424
135	162	0.485
136	163	0.352
137	164	0.482
138	165	0.456
139	166	0.592
140	167	0.639
141	168	0.572

	Time (sec)	Drawdown (ft)
142	169	0.788
143	170	0.862
144	171	0.819
145	172	0.719
146	173	0.845
147	174	0.845
148	175	0.841
149	176	0.93
150	177	0.784
151	178	0.805
152	179	0.937
153	180	1.008
154	181	0.991
155	182	1.098
156	183	0.935
157	184	1.119
158	185	1.052
159	186	1.148
160	187	0.971
161	188	0.959
162	189	1.06
163	190	0.975
164	191	1.047
165	192	1.065
166	193	1.007
167	194	0.909
168	195	1.003
169	196	0.976
170	197	0.975
171	198	0.999
172	199	0.967
173	200	1.091
174	201	1.014
175	202	0.938
176	203	1.047
177	204	0.923
178	205	0.864
179	206	1.088
180	207	0.855
181	208	1.003
182	209	0.937
183	210	0.895
184	211	1.111
185	212	1.095
186	213	0.988
187	214	1.092
188	215	0.983

	Time (sec)	Drawdown (ft)
189	216	1.077
190	217	0.968
191	218	0.981
192	219	1.08
193	220	0.927
194	221	1.048
195	222	1.095
196	223	0.966
197	224	0.885
198	225	1.031
199	226	0.933
200	227	0.904
201	228	0.918
202	229	1.02
203	230	0.891
204	231	0.962
205	232	1.156
206	233	1.04
207	234	0.863
208	235	0.928
209	236	0.896
210	237	1.043
211	238	0.981
212	239	0.998
213	240	0.852
214	241	0.992
215	242	1.067
216	243	0.909
217	244	0.99
218	245	1.001
219	246	0.916
220	247	0.942
221	248	1.032
222	249	1.061
223	250	1.108
224	251	0.898
225	252	0.991
226	253	1.07
227	254	0.938
228	255	0.929
229	256	0.831
230	257	0.935
231	258	1.073
232	259	0.899
233	260	0.988
234	261	0.96
235	262	1.097

	Time (sec)	Drawdown (ft)
236	263	0.95
237	264	0.934
238	265	1.019
239	266	0.936
240	267	0.856
241	268	1.016
242	269	0.964
243	270	0.834
244	271	0.975
245	272	0.926
246	273	0.892
247	274	0.88
248	275	0.84
249	276	0.99
250	277	0.841
251	278	0.825
252	279	0.977
253	280	0.773
254	281	0.781
255	282	0.85
256	283	0.826
257	284	0.934
258	285	0.705
259	286	0.879
260	287	0.945
261	288	0.985
262	289	0.919
263	290	0.842
264	291	0.907
265	292	0.968
266	293	0.859
267	294	1.005
268	295	0.792
269	296	0.984
270	297	0.919
271	298	0.821
272	299	0.802
273	300	0.969
274	301	0.907
275	302	0.893
276	303	1.033
277	304	0.919
278	305	0.949
279	306	0.761
280	307	0.921
281	308	0.877
282	309	0.896

	Time (sec)	Drawdown (ft)
283	310	0.896
284	311	0.883
285	312	0.648
286	313	0.858
287	314	0.887
288	315	0.925
289	316	0.894
290	317	0.882
291	318	0.84
292	319	0.842
293	320	0.823
294	321	0.752
295	322	0.854
296	323	0.851
297	324	0.865
298	325	0.823
299	326	0.947
300	327	0.755
301	328	0.938
302	329	0.883
303	330	0.795
304	331	0.865
305	332	0.84
306	333	0.894
307	334	0.768
308	335	1.018
309	336	0.769
310	337	0.925
311	338	0.858
312	339	0.837
313	340	0.76
314	341	0.99
315	342	0.92
316	343	0.719
317	344	0.988
318	345	0.865
319	346	0.825
320	347	1.001
321	348	1.006
322	349	0.991
323	350	1.023
324	351	0.795
325	352	0.886
326	353	0.876
327	354	0.814
328	355	0.879
329	356	0.926

	Time (sec)	Drawdown (ft)
330	357	0.93
331	358	0.807
332	359	0.895
333	360	0.819
334	361	0.85
335	362	0.899
336	363	0.948
337	364	0.773
338	365	0.832
339	366	0.861
340	367	0.81
341	368	0.804
342	369	0.89
343	370	0.765
344	371	0.989
345	372	0.853
346	373	0.669
347	374	0.709
348	375	0.911
349	376	0.929
350	377	0.745
351	378	0.951
352	379	0.938
353	380	0.935
354	381	0.933
355	382	0.967
356	383	0.784
357	384	0.802
358	385	0.782
359	386	0.774
360	387	0.844
361	388	0.659
362	389	0.862
363	390	0.924
364	391	0.874
365	392	0.654
366	393	0.737
367	394	0.916
368	395	0.809
369	396	0.768
370	397	0.628
371	398	0.72
372	399	0.901
373	400	0.89
374	401	0.864
375	402	0.927
376	403	0.776

	Time (sec)	Drawdown (ft)
377	404	0.892
378	405	0.804
379	406	0.853
380	407	0.76
381	408	0.797
382	409	0.813
383	410	0.823
384	411	0.789
385	412	0.98
386	413	0.882
387	414	0.962
388	415	0.825
389	416	0.824
390	417	0.836
391	418	0.834
392	419	0.77
393	420	0.819
394	421	0.842
395	422	0.963
396	423	0.796
397	424	0.877
398	425	0.955
399	426	0.869
400	427	0.867
401	428	0.732
402	429	0.815
403	430	0.884
404	431	0.837
405	432	0.748
406	433	0.879
407	434	0.995
408	435	0.785
409	436	0.827
410	437	0.7
411	438	0.784
412	439	0.753
413	440	0.979
414	441	0.839
415	442	0.703
416	443	0.624
417	444	0.71
418	445	0.921
419	446	0.777
420	447	0.76
421	448	0.872
422	449	0.948
423	450	0.783

	Time (sec)	Drawdown (ft)
424	451	0.803
425	452	0.776
426	453	0.825
427	454	0.711
428	455	0.766
429	456	0.902
430	457	0.895
431	458	0.638
432	459	0.75
433	460	0.685
434	461	0.866
435	462	0.742
436	463	0.742
437	464	0.815
438	465	0.737
439	466	0.738
440	467	0.915
441	468	0.836
442	469	0.725
443	470	0.923
444	471	0.787
445	472	0.785
446	473	0.822
447	474	0.883
448	475	0.672
449	476	0.947
450	477	0.879
451	478	0.713
452	479	0.832
453	480	0.803
454	481	0.865
455	482	0.929
456	483	0.846
457	484	0.837
458	485	0.802
459	486	0.941
460	487	0.779
461	488	0.819
462	489	0.774
463	490	0.936
464	491	0.666
465	492	0.714
466	493	0.857
467	494	0.774
468	495	0.874
469	496	0.881
470	497	0.827

	Time (sec)	Drawdown (ft)
471	498	0.931
472	499	0.673
473	500	0.863
474	501	0.808
475	502	0.765
476	503	0.821
477	504	0.962
478	505	0.98
479	506	0.878
480	507	0.864
481	508	0.768
482	509	0.901
483	510	0.822
484	511	0.92
485	512	0.748
486	513	0.822
487	514	0.881
488	515	0.728
489	516	0.954
490	517	0.815
491	518	0.772
492	519	0.792
493	520	0.86
494	521	0.76
495	522	0.805
496	523	0.844
497	524	0.753
498	525	0.686
499	526	0.849
500	527	0.817
501	528	0.781
502	529	0.745
503	530	0.758
504	531	0.952
505	532	0.734
506	533	0.836
507	534	0.739
508	535	0.898
509	536	0.919
510	537	0.765
511	538	0.843
512	539	0.941
513	540	0.865
514	541	0.851
515	542	0.788
516	543	0.781
517	544	1.011

	Time (sec)	Drawdown (ft)
518	545	0.738
519	546	0.751
520	547	0.719
521	548	0.722
522	549	0.753
523	550	0.911
524	551	0.867
525	552	0.715
526	553	0.6
527	554	0.929
528	555	0.727
529	556	0.728
530	557	0.81
531	558	0.754
532	559	0.76
533	560	0.891
534	561	0.879
535	562	0.83
536	563	0.754
537	564	0.7
538	565	0.692
539	566	0.88
540	567	0.843
541	568	0.706
542	569	0.787
543	570	0.809
544	571	0.587
545	572	0.668
546	573	0.714
547	574	0.851
548	575	0.734
549	576	0.821
550	577	0.839
551	578	0.727
552	579	0.841
553	580	0.857
554	581	0.817
555	582	0.774
556	583	0.779
557	584	0.695
558	585	0.795
559	586	0.728
560	587	0.775
561	588	0.736
562	589	0.811
563	590	0.799
564	591	0.85

	Time (sec)	Drawdown (ft)
565	592	0.838
566	593	0.77
567	594	0.858
568	595	0.924
569	596	0.853
570	597	0.71
571	598	0.881
572	599	0.786
573	600	0.753
574	601	0.76
575	602	0.792
576	603	0.918
577	604	0.819
578	605	0.962
579	606	0.864
580	607	0.871
581	608	0.778
582	609	0.966
583	610	0.842
584	611	0.892
585	612	0.74
586	613	0.825
587	614	0.918
588	615	0.905
589	616	0.904
590	617	0.93
591	618	0.786
592	619	0.701
593	620	0.76
594	621	0.88
595	622	0.791
596	623	0.805
597	624	0.742
598	625	0.793
599	626	0.868
600	627	0.857
601	628	0.744
602	629	0.863
603	630	0.888
604	631	0.734
605	632	0.952
606	633	0.789
607	634	0.786
608	635	0.659
609	636	0.951
610	637	0.806
611	638	0.891

	Time (sec)	Drawdown (ft)
612	639	0.941
613	640	0.866
614	641	0.964
615	642	0.809
616	643	0.758
617	644	0.897
618	645	0.767
619	646	0.77
620	647	0.814
621	648	0.884
622	649	0.722
623	650	0.762
624	651	0.931
625	652	0.794
626	653	0.938
627	654	0.804
628	655	0.749
629	656	0.72
630	657	0.72
631	658	0.782
632	659	0.8
633	660	0.742
634	661	0.774
635	662	0.837
636	663	0.866
637	664	0.775
638	665	0.728
639	666	0.834
640	667	0.756
641	668	0.683
642	669	0.734
643	670	0.823
644	671	0.703
645	672	0.846
646	673	0.842
647	674	0.826
648	675	0.936
649	676	0.863
650	677	0.799
651	678	0.572
652	679	0.738
653	680	0.857
654	681	0.635
655	682	0.8
656	683	0.704
657	684	0.679
658	685	0.732

	Time (sec)	Drawdown (ft)
659	686	0.945
660	687	0.724
661	688	0.76
662	689	0.704
663	690	0.762
664	691	0.704
665	692	0.92
666	693	0.705
667	694	0.72
668	695	0.64
669	696	0.829
670	697	0.666
671	698	0.594
672	699	0.587
673	700	0.904
674	701	0.756
675	702	0.736
676	703	0.758
677	704	0.853
678	705	0.695
679	706	0.831
680	707	0.561
681	708	0.759
682	709	0.761
683	710	0.793
684	711	0.696
685	712	0.934
686	713	0.802
687	714	0.741
688	715	0.694
689	716	0.889
690	717	0.827
691	718	0.86
692	719	0.735
693	720	0.798
694	721	0.778
695	722	0.804
696	723	0.945
697	724	0.802
698	725	0.868
699	726	0.617
700	727	0.655
701	728	0.826
702	729	0.748
703	730	0.68
704	731	0.642
705	732	0.808

	Time (sec)	Drawdown (ft)
706	733	0.673
707	734	0.788
708	735	0.694
709	736	0.625
710	737	0.793
711	738	0.754
712	739	0.85
713	740	0.717
714	741	0.801
715	742	0.813
716	743	0.774
717	744	0.912
718	745	0.776
719	746	0.831
720	747	0.907
721	748	0.713
722	749	0.769
723	750	0.7
724	751	0.749
725	752	0.88
726	753	0.761
727	754	0.674
728	755	0.82
729	756	0.814
730	757	0.819
731	758	0.81
732	759	0.828
733	760	0.791
734	761	0.69
735	762	0.864
736	763	0.8
737	764	0.692
738	765	0.762
739	766	0.699
740	767	0.773
741	768	0.891
742	769	0.808
743	770	0.702
744	771	0.866
745	772	0.866
746	773	0.756
747	774	0.786
748	775	0.825
749	776	0.862
750	777	0.862
751	778	0.841
752	779	0.654

	Time (sec)	Drawdown (ft)
753	780	0.737
754	781	0.793
755	782	0.638
756	783	0.828
757	784	0.784
758	785	0.683
759	786	0.686
760	787	0.63
761	788	0.926
762	789	0.755
763	790	0.784
764	791	0.893
765	792	0.747
766	793	0.581
767	794	0.74
768	795	0.805
769	796	0.856
770	797	0.669
771	798	0.72
772	799	0.705
773	800	0.745
774	801	0.844
775	802	0.776
776	803	0.712
777	804	0.707
778	805	0.711
779	806	0.829
780	807	0.839
781	808	0.833
782	809	0.545
783	810	0.804
784	811	0.774
785	812	0.579
786	813	0.737
787	814	0.805
788	815	0.796
789	816	0.817
790	817	0.87
791	818	0.804
792	819	0.817
793	820	0.862
794	821	0.74
795	822	0.643
796	823	0.64
797	824	0.692
798	825	0.667
799	826	0.785

	Time (sec)	Drawdown (ft)
800	827	0.759
801	828	0.801
802	829	0.847
803	830	0.926
804	831	0.636
805	832	0.84
806	833	0.715
807	834	0.666
808	835	0.886
809	836	0.743
810	837	0.803
811	838	0.869
812	839	0.799
813	840	0.791
814	841	0.754
815	842	0.764
816	843	0.948
817	844	0.756
818	845	0.761
819	846	0.723
820	847	0.705
821	848	0.593
822	849	0.747
823	850	0.807
824	851	0.736
825	852	0.813
826	853	0.646
827	854	0.678
828	855	0.769
829	856	0.726
830	857	0.819
831	858	0.796
832	859	0.732
833	860	0.703
834	861	0.693
835	862	0.853
836	863	0.757
837	864	0.641
838	865	0.78
839	866	0.703
840	867	0.574
841	868	0.692
842	869	0.878
843	870	0.788
844	871	0.706
845	872	0.824
846	873	0.711

	Time (sec)	Drawdown (ft)
847	874	0.698
848	875	0.803
849	876	0.725
850	877	0.703
851	878	0.802
852	879	0.711
853	880	0.851
854	881	0.726
855	882	0.735
856	883	0.764
857	884	0.733
858	885	0.743
859	886	0.831
860	887	0.794
861	888	0.544
862	889	0.794
863	890	0.709
864	891	0.775
865	892	0.761
866	893	0.657
867	894	0.684
868	895	0.72
869	896	0.834
870	897	0.746
871	898	0.883
872	899	0.745
873	900	0.712
874	901	0.81
875	902	0.871
876	903	0.628
877	904	0.865
878	905	0.701
879	906	0.632
880	907	0.672
881	908	0.628
882	909	0.747
883	910	0.753
884	911	0.867
885	912	0.782
886	913	0.653
887	914	0.703
888	915	0.527
889	916	0.621
890	917	0.631
891	918	0.72
892	919	0.676
893	920	0.916

	Time (sec)	Drawdown (ft)
894	921	0.707
895	922	0.723
896	923	0.722
897	924	0.551
898	925	0.722
899	926	0.694
900	927	0.528
901	928	0.793
902	929	0.642
903	930	0.65
904	931	0.617
905	932	0.653
906	933	0.691
907	934	0.756
908	935	0.673
909	936	0.548
910	937	0.713
911	938	0.773
912	939	0.684
913	940	0.792
914	941	0.686
915	942	0.652
916	943	0.762
917	944	0.78
918	945	0.54
919	946	0.724
920	947	0.672
921	948	0.69
922	949	0.689
923	950	0.799
924	951	0.633
925	952	0.622
926	953	0.745
927	954	0.78
928	955	0.813
929	956	0.761
930	957	0.874
931	958	0.717
932	959	0.59
933	960	0.687
934	961	0.728
935	962	0.733
936	963	0.605
937	964	0.583
938	965	0.677
939	966	0.652
940	967	0.709

	Time (sec)	Drawdown (ft)
941	968	0.673
942	969	0.571
943	970	0.681
944	971	0.611
945	972	0.659
946	973	0.722
947	974	0.668
948	975	0.501
949	976	0.623
950	977	0.693
951	978	0.624
952	979	0.52
953	980	0.612
954	981	0.56
955	982	0.606
956	983	0.632
957	984	0.661
958	985	0.505
959	986	0.426
960	987	0.797
961	988	0.706
962	989	0.626
963	990	0.467
964	991	0.509
965	992	0.65
966	993	0.658
967	994	0.528
968	995	0.57
969	996	0.739
970	997	0.632
971	998	0.582
972	999	0.682
973	1000	0.779
974	1001	0.489
975	1002	0.567
976	1003	0.667
977	1004	0.695
978	1005	0.543
979	1006	0.594
980	1007	0.612
981	1008	0.55
982	1009	0.538
983	1010	0.652
984	1011	0.504
985	1012	0.593
986	1013	0.452
987	1014	0.548

	Time (sec)	Drawdown (ft)
988	1015	0.402
989	1016	0.547
990	1017	0.559
991	1018	0.645
992	1019	0.699
993	1020	0.584
994	1021	0.589
995	1022	0.73
996	1023	0.489
997	1024	0.566
998	1025	0.612
999	1026	0.63
1000	1027	0.604
1001	1028	0.545
1002	1029	0.529
1003	1030	0.629
1004	1031	0.659
1005	1032	0.498
1006	1033	0.615
1007	1034	0.637
1008	1035	0.618
1009	1036	0.743
1010	1037	0.52
1011	1038	0.525
1012	1039	0.539
1013	1040	0.621
1014	1041	0.512
1015	1042	0.645
1016	1043	0.662
1017	1044	0.586
1018	1045	0.637
1019	1046	0.4
1020	1047	0.689
1021	1048	0.502
1022	1049	0.668
1023	1050	0.562
1024	1051	0.605
1025	1052	0.624
1026	1053	0.409
1027	1054	0.569
1028	1055	0.523
1029	1056	0.643
1030	1057	0.59
1031	1058	0.548
1032	1059	0.641
1033	1060	0.573
1034	1061	0.604

	Time (sec)	Drawdown (ft)
1035	1062	0.577
1036	1063	0.531
1037	1064	0.468
1038	1065	0.69
1039	1066	0.509
1040	1067	0.599
1041	1068	0.502
1042	1069	0.681
1043	1070	0.421
1044	1071	0.729
1045	1072	0.709
1046	1073	0.529
1047	1074	0.527
1048	1075	0.631
1049	1076	0.536
1050	1077	0.621
1051	1078	0.466
1052	1079	0.511
1053	1080	0.671
1054	1081	0.537
1055	1082	0.706
1056	1083	0.671
1057	1084	0.442
1058	1085	0.578
1059	1086	0.53
1060	1087	0.578
1061	1088	0.594
1062	1089	0.552
1063	1090	0.772
1064	1091	0.613
1065	1092	0.626
1066	1093	0.733
1067	1094	0.519
1068	1095	0.603
1069	1096	0.564
1070	1097	0.528
1071	1098	0.766
1072	1099	0.747
1073	1100	0.479
1074	1101	0.558
1075	1102	0.61
1076	1103	0.613
1077	1104	0.763
1078	1105	0.545
1079	1106	0.469
1080	1107	0.691
1081	1108	0.56

	Time (sec)	Drawdown (ft)
1082	1109	0.585
1083	1110	0.704
1084	1111	0.694
1085	1112	0.416
1086	1113	0.45
1087	1114	0.657
1088	1115	0.552
1089	1116	0.539
1090	1117	0.423
1091	1118	0.504
1092	1119	0.64
1093	1120	0.464
1094	1121	0.686
1095	1122	0.602
1096	1123	0.47
1097	1124	0.636
1098	1125	0.592
1099	1126	0.627
1100	1127	0.612
1101	1128	0.483
1102	1129	0.595
1103	1130	0.55
1104	1131	0.484
1105	1132	0.511
1106	1133	0.542
1107	1134	0.595
1108	1135	0.507
1109	1136	0.574
1110	1137	0.525
1111	1138	0.598
1112	1139	0.607
1113	1140	0.595
1114	1141	0.64
1115	1142	0.613
1116	1143	0.434
1117	1144	0.54
1118	1145	0.603
1119	1146	0.57
1120	1147	0.492
1121	1148	0.722
1122	1149	0.599
1123	1150	0.617
1124	1151	0.686
1125	1152	0.687
1126	1153	0.582
1127	1154	0.61
1128	1155	0.495

	Time (sec)	Drawdown (ft)
1129	1156	0.498
1130	1157	0.556
1131	1158	0.48
1132	1159	0.614
1133	1160	0.619
1134	1161	0.496
1135	1162	0.668
1136	1163	0.539
1137	1164	0.504
1138	1165	0.671
1139	1166	0.574
1140	1167	0.526
1141	1168	0.418
1142	1169	0.547
1143	1170	0.583
1144	1171	0.514
1145	1172	0.469
1146	1173	0.642
1147	1174	0.614
1148	1175	0.596
1149	1176	0.62
1150	1177	0.54
1151	1178	0.426
1152	1179	0.414
1153	1180	0.471
1154	1181	0.553
1155	1182	0.609
1156	1183	0.595
1157	1184	0.603
1158	1185	0.589
1159	1186	0.431
1160	1187	0.544
1161	1188	0.638
1162	1189	0.709
1163	1190	0.548
1164	1191	0.595
1165	1192	0.542
1166	1193	0.496
1167	1194	0.569
1168	1195	0.545
1169	1196	0.593
1170	1197	0.509
1171	1198	0.588
1172	1199	0.457
1173	1200	0.64
1174	1201	0.601
1175	1202	0.623

	Time (sec)	Drawdown (ft)
1176	1203	0.529
1177	1204	0.6
1178	1205	0.529
1179	1206	0.562
1180	1207	0.603
1181	1208	0.586
1182	1209	0.683
1183	1210	0.682
1184	1211	0.419
1185	1212	0.486
1186	1213	0.404
1187	1214	0.522
1188	1215	0.705
1189	1216	0.63
1190	1217	0.723
1191	1218	0.573
1192	1219	0.676
1193	1220	0.501
1194	1221	0.66
1195	1222	0.587
1196	1223	0.555
1197	1224	0.442
1198	1225	0.427
1199	1226	0.602
1200	1227	0.617
1201	1228	0.4
1202	1229	0.512
1203	1230	0.518
1204	1231	0.6
1205	1232	0.595
1206	1233	0.577
1207	1234	0.501
1208	1235	0.438
1209	1236	0.624
1210	1237	0.556
1211	1238	0.544
1212	1239	0.55
1213	1240	0.652
1214	1241	0.393
1215	1242	0.566
1216	1243	0.528
1217	1244	0.632
1218	1245	0.627
1219	1246	0.502
1220	1247	0.691
1221	1248	0.563
1222	1249	0.537

	Time (sec)	Drawdown (ft)
1223	1250	0.484
1224	1251	0.429
1225	1252	0.596
1226	1253	0.521
1227	1254	0.529
1228	1255	0.578
1229	1256	0.489
1230	1257	0.402
1231	1258	0.61
1232	1259	0.696
1233	1260	0.55
1234	1261	0.523
1235	1262	0.599
1236	1263	0.588
1237	1264	0.53
1238	1265	0.599
1239	1266	0.544
1240	1267	0.582
1241	1268	0.671
1242	1269	0.786
1243	1270	0.753
1244	1271	0.51
1245	1272	0.532
1246	1273	0.597
1247	1274	0.544
1248	1275	0.563
1249	1276	0.739
1250	1277	0.526
1251	1278	0.511
1252	1279	0.526
1253	1280	0.601
1254	1281	0.328
1255	1282	0.696
1256	1283	0.587
1257	1284	0.69
1258	1285	0.743
1259	1286	0.534
1260	1287	0.677
1261	1288	0.576
1262	1289	0.708
1263	1290	0.422
1264	1291	0.591
1265	1292	0.607
1266	1293	0.634
1267	1294	0.596
1268	1295	0.467
1269	1296	0.483

	Time (sec)	Drawdown (ft)
1270	1297	0.464
1271	1298	0.674
1272	1299	0.51
1273	1300	0.554
1274	1301	0.662
1275	1302	0.452
1276	1303	0.619
1277	1304	0.514
1278	1305	0.45
1279	1306	0.724
1280	1307	0.553
1281	1308	0.411
1282	1309	0.593
1283	1310	0.593
1284	1311	0.581
1285	1312	0.659
1286	1313	0.572
1287	1314	0.541
1288	1315	0.669
1289	1316	0.567
1290	1317	0.665
1291	1318	0.508
1292	1319	0.49
1293	1320	0.474
1294	1321	0.515
1295	1322	0.451
1296	1323	0.722
1297	1324	0.502
1298	1325	0.701
1299	1326	0.508
1300	1327	0.714
1301	1328	0.517
1302	1329	0.442
1303	1330	0.501
1304	1331	0.494
1305	1332	0.598
1306	1333	0.662
1307	1334	0.534
1308	1335	0.455
1309	1336	0.585
1310	1337	0.619
1311	1338	0.432
1312	1339	0.615
1313	1340	0.614
1314	1341	0.658
1315	1342	0.545
1316	1343	0.667

	Time (sec)	Drawdown (ft)
1317	1344	0.609
1318	1345	0.607
1319	1346	0.535
1320	1347	0.417
1321	1348	0.557
1322	1349	0.634
1323	1350	0.479
1324	1351	0.511
1325	1352	0.433
1326	1353	0.509
1327	1354	0.518
1328	1355	0.448
1329	1356	0.555
1330	1357	0.554
1331	1358	0.493
1332	1359	0.572
1333	1360	0.618
1334	1361	0.564
1335	1362	0.704
1336	1363	0.412
1337	1364	0.638
1338	1365	0.505
1339	1366	0.453
1340	1367	0.46
1341	1368	0.551
1342	1369	0.6
1343	1370	0.539
1344	1371	0.482
1345	1372	0.583
1346	1373	0.589
1347	1374	0.589
1348	1375	0.525
1349	1376	0.491
1350	1377	0.491
1351	1378	0.487
1352	1379	0.749
1353	1380	0.662
1354	1381	0.342
1355	1382	0.656
1356	1383	0.529
1357	1384	0.483
1358	1385	0.534
1359	1386	0.634
1360	1387	0.514
1361	1388	0.5
1362	1389	0.309
1363	1390	0.58

	Time (sec)	Drawdown (ft)
1364	1391	0.491
1365	1392	0.505
1366	1393	0.451
1367	1394	0.489
1368	1395	0.483
1369	1396	0.547
1370	1397	0.448
1371	1398	0.474
1372	1399	0.497
1373	1400	0.605
1374	1401	0.5
1375	1402	0.435
1376	1403	0.481
1377	1404	0.385
1378	1405	0.483
1379	1406	0.434
1380	1407	0.513
1381	1408	0.502
1382	1409	0.472
1383	1410	0.389
1384	1411	0.618
1385	1412	0.548
1386	1413	0.491
1387	1414	0.384
1388	1415	0.569
1389	1416	0.689
1390	1417	0.434
1391	1418	0.467
1392	1419	0.63
1393	1420	0.589
1394	1421	0.56
1395	1422	0.545
1396	1423	0.556
1397	1424	0.565
1398	1425	0.497
1399	1426	0.442
1400	1427	0.504
1401	1428	0.486
1402	1429	0.579
1403	1430	0.414
1404	1431	0.522
1405	1432	0.469
1406	1433	0.709
1407	1434	0.519
1408	1435	0.609
1409	1436	0.629
1410	1437	0.397

	Time (sec)	Drawdown (ft)
1411	1438	0.389
1412	1439	0.465
1413	1440	0.431
1414	1441	0.625
1415	1442	0.437
1416	1443	0.581
1417	1444	0.375
1418	1445	0.525
1419	1446	0.583
1420	1447	0.46
1421	1448	0.523
1422	1449	0.59
1423	1450	0.498
1424	1451	0.544
1425	1452	0.622
1426	1453	0.505
1427	1454	0.503
1428	1455	0.441
1429	1456	0.485
1430	1457	0.537
1431	1458	0.523
1432	1459	0.52
1433	1460	0.399
1434	1461	0.461
1435	1462	0.467
1436	1463	0.447
1437	1464	0.471
1438	1465	0.494
1439	1466	0.569
1440	1467	0.511
1441	1468	0.549
1442	1469	0.548
1443	1470	0.615
1444	1471	0.619
1445	1472	0.546
1446	1473	0.561
1447	1474	0.608
1448	1475	0.532
1449	1476	0.561
1450	1477	0.477
1451	1478	0.531
1452	1479	0.411
1453	1480	0.597
1454	1481	0.466
1455	1482	0.565
1456	1483	0.459
1457	1484	0.545

	Time (sec)	Drawdown (ft)
1458	1485	0.575
1459	1486	0.391
1460	1487	0.45
1461	1488	0.527
1462	1489	0.73
1463	1490	0.449
1464	1491	0.372
1465	1492	0.644
1466	1493	0.682
1467	1494	0.418
1468	1495	0.519
1469	1496	0.635
1470	1497	0.605
1471	1498	0.454
1472	1499	0.489
1473	1500	0.628
1474	1501	0.486
1475	1502	0.517
1476	1503	0.443
1477	1504	0.468
1478	1505	0.681
1479	1506	0.534
1480	1507	0.73
1481	1508	0.613
1482	1509	0.591
1483	1510	0.512
1484	1511	0.675
1485	1512	0.33
1486	1513	0.464
1487	1514	0.623
1488	1515	0.512
1489	1516	0.43
1490	1517	0.446
1491	1518	0.581
1492	1519	0.515
1493	1520	0.49
1494	1521	0.516
1495	1522	0.502
1496	1523	0.499
1497	1524	0.509
1498	1525	0.615
1499	1526	0.424
1500	1527	0.573
1501	1528	0.538
1502	1529	0.457
1503	1530	0.623
1504	1531	0.504

	Time (sec)	Drawdown (ft)
1505	1532	0.546
1506	1533	0.484
1507	1534	0.483
1508	1535	0.568
1509	1536	0.525
1510	1537	0.593
1511	1538	0.513
1512	1539	0.454
1513	1540	0.548
1514	1541	0.451
1515	1542	0.494
1516	1543	0.59
1517	1544	0.47
1518	1545	0.576
1519	1546	0.548
1520	1547	0.523
1521	1548	0.555
1522	1549	0.545
1523	1550	0.474
1524	1551	0.64
1525	1552	0.515
1526	1553	0.486
1527	1554	0.425
1528	1555	0.654
1529	1556	0.481
1530	1557	0.536
1531	1558	0.654
1532	1559	0.412
1533	1560	0.613
1534	1561	0.373
1535	1562	0.438
1536	1563	0.741
1537	1564	0.5
1538	1565	0.472
1539	1566	0.65
1540	1567	0.569
1541	1568	0.571
1542	1569	0.569
1543	1570	0.526
1544	1571	0.497
1545	1572	0.528
1546	1573	0.427
1547	1574	0.581
1548	1575	0.538
1549	1576	0.504
1550	1577	0.452
1551	1578	0.538

	Time (sec)	Drawdown (ft)
1552	1579	0.477
1553	1580	0.54
1554	1581	0.452
1555	1582	0.527
1556	1583	0.468
1557	1584	0.52
1558	1585	0.742
1559	1586	0.636
1560	1587	0.623
1561	1588	0.802
1562	1589	0.933
1563	1590	1.044
1564	1591	1.246
1565	1592	1.235
1566	1593	1.358
1567	1594	1.426
1568	1595	1.531
1569	1596	1.607
1570	1597	1.602
1571	1598	1.812
1572	1599	1.916
1573	1600	1.766
1574	1601	1.797
1575	1602	1.904
1576	1603	1.911
1577	1604	1.951
1578	1605	2.03
1579	1606	1.991
1580	1607	1.894
1581	1608	2.021
1582	1609	2.065
1583	1610	2.023
1584	1611	1.949
1585	1612	2.15
1586	1613	1.978
1587	1614	1.842
1588	1615	1.803
1589	1616	1.771
1590	1617	1.656
1591	1618	1.664
1592	1619	1.64
1593	1620	1.56
1594	1621	1.524
1595	1622	1.379
1596	1623	1.322
1597	1624	1.395
1598	1625	1.246

	Time (sec)	Drawdown (ft)
1599	1626	1.244
1600	1627	1.312
1601	1628	1.28
1602	1629	1.217
1603	1630	1.149
1604	1631	1.103
1605	1632	1.233
1606	1633	1.192
1607	1634	1.104
1608	1635	1.075
1609	1636	1.161
1610	1637	1.162
1611	1638	1.044
1612	1639	1.148
1613	1640	1.071
1614	1641	1.135
1615	1642	1.162
1616	1643	1.047
1617	1644	1.102
1618	1645	1.172
1619	1646	1.192
1620	1647	1.071
1621	1648	1.2
1622	1649	1.176
1623	1650	1.052
1624	1651	1.133
1625	1652	1.105
1626	1653	1.156
1627	1654	1.012
1628	1655	1.216
1629	1656	1.091
1630	1657	1.091
1631	1658	1.271
1632	1659	1.238
1633	1660	1.255
1634	1661	1.417
1635	1662	1.506
1636	1663	1.608
1637	1664	1.888
1638	1665	2.128
1639	1666	2.25
1640	1667	2.407
1641	1668	2.523
1642	1669	2.696
1643	1670	2.668
1644	1671	2.821
1645	1672	2.727

	Time (sec)	Drawdown (ft)
1646	1673	2.636
1647	1674	2.559
1648	1675	2.597
1649	1676	2.464
1650	1677	2.445
1651	1678	2.354
1652	1679	2.423
1653	1680	2.354
1654	1681	2.396
1655	1682	2.317
1656	1683	2.198
1657	1684	2.256
1658	1685	2.093
1659	1686	2.084
1660	1687	2.078
1661	1688	1.921
1662	1689	2.024
1663	1690	1.87
1664	1691	1.927
1665	1692	1.771
1666	1693	1.771
1667	1694	1.873
1668	1695	1.818
1669	1696	1.774
1670	1697	1.749
1671	1698	1.793
1672	1699	1.641
1673	1700	1.76
1674	1701	1.611
1675	1702	1.608
1676	1703	1.732
1677	1704	1.728
1678	1705	1.549
1679	1706	1.573
1680	1707	1.645
1681	1708	1.621
1682	1709	1.55
1683	1710	1.546
1684	1711	1.636
1685	1712	1.486
1686	1713	1.621
1687	1714	1.641
1688	1715	1.595
1689	1716	1.602
1690	1717	1.471
1691	1718	1.697
1692	1719	1.561

	Time (sec)	Drawdown (ft)
1693	1720	1.544
1694	1721	1.53
1695	1722	1.662
1696	1723	1.566
1697	1724	1.516
1698	1725	1.6
1699	1726	1.684
1700	1727	1.612
1701	1728	1.681
1702	1729	1.631
1703	1730	1.682
1704	1731	1.583
1705	1732	1.677
1706	1733	1.754
1707	1734	1.721
1708	1735	1.838
1709	1736	1.753
1710	1737	1.806
1711	1738	1.754
1712	1739	1.841
1713	1740	1.773
1714	1741	1.876
1715	1742	1.872
1716	1743	2.004
1717	1744	1.926
1718	1745	2.016
1719	1746	2.067
1720	1747	2.011
1721	1748	2.088
1722	1749	2.072
1723	1750	2.199
1724	1751	2.142
1725	1752	2.24
1726	1753	2.227
1727	1754	2.184
1728	1755	2.35
1729	1756	2.324
1730	1757	2.312
1731	1758	2.303
1732	1759	2.415
1733	1760	2.405
1734	1761	2.441
1735	1762	2.477
1736	1763	2.476
1737	1764	2.493
1738	1765	2.51
1739	1766	2.534

	Time (sec)	Drawdown (ft)
1740	1767	2.522
1741	1768	2.427
1742	1769	2.465
1743	1770	2.421
1744	1771	2.458
1745	1772	2.471
1746	1773	2.544
1747	1774	2.525
1748	1775	2.585
1749	1776	2.667
1750	1777	2.566
1751	1778	2.571
1752	1779	2.571
1753	1780	2.5
1754	1781	2.584
1755	1782	2.604
1756	1783	2.477
1757	1784	2.598
1758	1785	2.558
1759	1786	2.514
1760	1787	2.53
1761	1788	2.583
1762	1789	2.4
1763	1790	2.484
1764	1791	2.481
1765	1792	2.367
1766	1793	2.362
1767	1794	2.398
1768	1795	2.395
1769	1796	2.317
1770	1797	2.275
1771	1798	2.348
1772	1799	2.269
1773	1800	2.294
1774	1801	2.286
1775	1802	2.219
1776	1803	2.285
1777	1804	2.291
1778	1805	2.12
1779	1806	2.253
1780	1807	2.231
1781	1808	2.208
1782	1809	2.119
1783	1810	2.118
1784	1811	2.22
1785	1812	2.165
1786	1813	2.084

	Time (sec)	Drawdown (ft)
1787	1814	2.118
1788	1815	2.169
1789	1816	2.266
1790	1817	2.177
1791	1818	2.173
1792	1819	2.035
1793	1820	2.091
1794	1821	2.17
1795	1822	2.103
1796	1823	2.252
1797	1824	2.114
1798	1825	2.097
1799	1826	2.075
1800	1827	2.102
1801	1828	2.176
1802	1829	2.214
1803	1830	2.104
1804	1831	2.081
1805	1832	2.103
1806	1833	2.074
1807	1834	2.047
1808	1835	2.092
1809	1836	2.254
1810	1837	2.063
1811	1838	2.054
1812	1839	2.177
1813	1840	2.218
1814	1841	2.153
1815	1842	2.181
1816	1843	2.119
1817	1844	2.076
1818	1845	2.155
1819	1846	2.04
1820	1847	2.13
1821	1848	2.056
1822	1849	2.195
1823	1850	2.033
1824	1851	2.024
1825	1852	2.042
1826	1853	2.066
1827	1854	1.961
1828	1855	2.13
1829	1856	2.026
1830	1857	2.163
1831	1858	2.112
1832	1859	2.063
1833	1860	2.114

	Time (sec)	Drawdown (ft)
1834	1861	2.045
1835	1862	2.151
1836	1863	2.087
1837	1864	2.12
1838	1865	2.007
1839	1866	2.139
1840	1867	2.017
1841	1868	2.115
1842	1869	2.137
1843	1870	2.127
1844	1871	2.113
1845	1872	2.258
1846	1873	2.183
1847	1874	2.145
1848	1875	2.126
1849	1876	2.187
1850	1877	2.152
1851	1878	2.147
1852	1879	2.285
1853	1880	2.221
1854	1881	2.228
1855	1882	2.236
1856	1883	2.156
1857	1884	2.283
1858	1885	2.374
1859	1886	2.22
1860	1887	2.292
1861	1888	2.246
1862	1889	2.19
1863	1890	2.207
1864	1891	2.213
1865	1892	2.265
1866	1893	2.387
1867	1894	2.291
1868	1895	2.282
1869	1896	2.285
1870	1897	2.231
1871	1898	2.247
1872	1899	2.245
1873	1900	2.312
1874	1901	2.272
1875	1902	2.34
1876	1903	2.186
1877	1904	2.283
1878	1905	2.232
1879	1906	2.279
1880	1907	2.247

	Time (sec)	Drawdown (ft)
1881	1908	2.279
1882	1909	2.346
1883	1910	2.331
1884	1911	2.314
1885	1912	2.272
1886	1913	2.212
1887	1914	2.15
1888	1915	2.154
1889	1916	2.296
1890	1917	2.33
1891	1918	2.181
1892	1919	2.292
1893	1920	2.342
1894	1921	2.374
1895	1922	2.24
1896	1923	2.225
1897	1924	2.266
1898	1925	2.204
1899	1926	2.265
1900	1927	2.177
1901	1928	2.286
1902	1929	2.203
1903	1930	2.232
1904	1931	2.248
1905	1932	2.269
1906	1933	2.116
1907	1934	2.248
1908	1935	2.297
1909	1936	2.291
1910	1937	2.28
1911	1938	2.249
1912	1939	2.206
1913	1940	2.192
1914	1941	2.237
1915	1942	2.172
1916	1943	2.189
1917	1944	2.222
1918	1945	2.205
1919	1946	2.21
1920	1947	2.114
1921	1948	2.241
1922	1949	2.237
1923	1950	2.327
1924	1951	2.262
1925	1952	2.232
1926	1953	2.204
1927	1954	2.218

	Time (sec)	Drawdown (ft)
1928	1955	2.287
1929	1956	2.251
1930	1957	2.326
1931	1958	2.263
1932	1959	2.304
1933	1960	2.348
1934	1961	2.225
1935	1962	2.214
1936	1963	2.218
1937	1964	2.138
1938	1965	2.239
1939	1966	2.269
1940	1967	2.193
1941	1968	2.229
1942	1969	2.26
1943	1970	2.212
1944	1971	2.329
1945	1972	2.246
1946	1973	2.207
1947	1974	2.251
1948	1975	2.234
1949	1976	2.245
1950	1977	2.21
1951	1978	2.216
1952	1979	2.179
1953	1980	2.248
1954	1981	2.221
1955	1982	2.249
1956	1983	2.161
1957	1984	2.225
1958	1985	2.353
1959	1986	2.201
1960	1987	2.297
1961	1988	2.252
1962	1989	2.297
1963	1990	2.294
1964	1991	2.195
1965	1992	2.255
1966	1993	2.274
1967	1994	2.199
1968	1995	2.205
1969	1996	2.212
1970	1997	2.259
1971	1998	2.258
1972	1999	2.164
1973	2000	2.346
1974	2001	2.294

	Time (sec)	Drawdown (ft)
1975	2002	2.3
1976	2003	2.244
1977	2004	2.089
1978	2005	2.255
1979	2006	2.275
1980	2007	2.287
1981	2008	2.214
1982	2009	2.213
1983	2010	2.107
1984	2011	2.224
1985	2012	2.295
1986	2013	2.366
1987	2014	2.213
1988	2015	2.131
1989	2016	2.278
1990	2017	2.209
1991	2018	2.198
1992	2019	2.281
1993	2020	2.213
1994	2021	2.277
1995	2022	2.283
1996	2023	2.198
1997	2024	2.231
1998	2025	2.261
1999	2026	2.373
2000	2027	2.171
2001	2028	2.258
2002	2029	2.241
2003	2030	2.336
2004	2031	2.257
2005	2032	2.205
2006	2033	2.247
2007	2034	2.248
2008	2035	2.242
2009	2036	2.23
2010	2037	2.125
2011	2038	2.248
2012	2039	2.217
2013	2040	2.185
2014	2041	2.215
2015	2042	2.288
2016	2043	2.219
2017	2044	2.209
2018	2045	2.278
2019	2046	2.179
2020	2047	2.193
2021	2048	2.336

	Time (sec)	Drawdown (ft)
2022	2049	2.202
2023	2050	2.159
2024	2051	2.338
2025	2052	2.155
2026	2053	2.231
2027	2054	2.301
2028	2055	2.259
2029	2056	2.244
2030	2057	2.214
2031	2058	2.211
2032	2059	2.214
2033	2060	2.247
2034	2061	2.196
2035	2062	2.302
2036	2063	2.212
2037	2064	2.21
2038	2065	2.109
2039	2066	2.141
2040	2067	2.224
2041	2068	2.25
2042	2069	2.295
2043	2070	2.269
2044	2071	2.275
2045	2072	2.167
2046	2073	2.241
2047	2074	2.323
2048	2075	2.244
2049	2076	2.148
2050	2077	2.183
2051	2078	2.188
2052	2079	2.279
2053	2080	2.217
2054	2081	2.211
2055	2082	2.242
2056	2083	2.391
2057	2084	2.23
2058	2085	2.246
2059	2086	2.292
2060	2087	2.214
2061	2088	2.21
2062	2089	2.259
2063	2090	2.201
2064	2091	2.229
2065	2092	2.209
2066	2093	2.243
2067	2094	2.167
2068	2095	2.2

	Time (sec)	Drawdown (ft)
2069	2096	2.275
2070	2097	2.168
2071	2098	2.247
2072	2099	2.18
2073	2100	2.253
2074	2101	2.165
2075	2102	2.177
2076	2103	2.208
2077	2104	2.205
2078	2105	2.223
2079	2106	2.28
2080	2107	2.248
2081	2108	2.222
2082	2109	2.223
2083	2110	2.139
2084	2111	2.258
2085	2112	2.151
2086	2113	2.141
2087	2114	2.279
2088	2115	2.229
2089	2116	2.116
2090	2117	2.192
2091	2118	2.235
2092	2119	2.205
2093	2120	2.285
2094	2121	2.114
2095	2122	2.275
2096	2123	2.161
2097	2124	2.334
2098	2125	2.198
2099	2126	2.199
2100	2127	2.33
2101	2128	2.292
2102	2129	2.307
2103	2130	2.235
2104	2131	2.32
2105	2132	2.135
2106	2133	2.282
2107	2134	2.318
2108	2135	2.279
2109	2136	2.149
2110	2137	2.267
2111	2138	2.143
2112	2139	2.211
2113	2140	2.227
2114	2141	2.255
2115	2142	2.095

	Time (sec)	Drawdown (ft)
2116	2143	2.191
2117	2144	2.179
2118	2145	2.122
2119	2146	2.251
2120	2147	2.244
2121	2148	2.223
2122	2149	2.302
2123	2150	2.148
2124	2151	2.262
2125	2152	2.351
2126	2153	2.272
2127	2154	2.286
2128	2155	2.261
2129	2156	2.264
2130	2157	2.235
2131	2158	2.132
2132	2159	2.277
2133	2160	2.181
2134	2161	2.198
2135	2162	2.23
2136	2163	2.285
2137	2164	2.215
2138	2165	2.301
2139	2166	2.267
2140	2167	2.204
2141	2168	2.188
2142	2169	2.136
2143	2170	2.105
2144	2171	2.188
2145	2172	2.184
2146	2173	2.134
2147	2174	2.007
2148	2175	2.151
2149	2176	2.142
2150	2177	2.073
2151	2178	2.159
2152	2179	2.053
2153	2180	2.018
2154	2181	2.05
2155	2182	2.061
2156	2183	2.008
2157	2184	2.113
2158	2185	2.063
2159	2186	1.972
2160	2187	2.003
2161	2188	1.981
2162	2189	2.006

	Time (sec)	Drawdown (ft)
2163	2190	2.031
2164	2191	2.012
2165	2192	2.008
2166	2193	1.986
2167	2194	2.082
2168	2195	1.973
2169	2196	2.027
2170	2197	2.058
2171	2198	1.99
2172	2199	2.005
2173	2200	2.016
2174	2201	2.057
2175	2202	2.004
2176	2203	2.056
2177	2204	2.017
2178	2205	1.909
2179	2206	1.962
2180	2207	2.076
2181	2208	2.033
2182	2209	2.09
2183	2210	2.115
2184	2211	1.965
2185	2212	1.952
2186	2213	2.026
2187	2214	2.001
2188	2215	1.916
2189	2216	2.058
2190	2217	1.974
2191	2218	1.906
2192	2219	1.947
2193	2220	2.048
2194	2221	2.024
2195	2222	1.931
2196	2223	1.919
2197	2224	1.992
2198	2225	1.886
2199	2226	1.957
2200	2227	2.027
2201	2228	2.004
2202	2229	1.954
2203	2230	1.928
2204	2231	1.839
2205	2232	1.963
2206	2233	1.87
2207	2234	1.845
2208	2235	1.969
2209	2236	1.892

	Time (sec)	Drawdown (ft)
2210	2237	1.853
2211	2238	1.773
2212	2239	1.908
2213	2240	1.791
2214	2241	1.929
2215	2242	1.888
2216	2243	1.82
2217	2244	1.802
2218	2245	1.786
2219	2246	1.768
2220	2247	1.738
2221	2248	1.775
2222	2249	1.727
2223	2250	1.778
2224	2251	1.956
2225	2252	1.843
2226	2253	1.849
2227	2254	1.787
2228	2255	1.822
2229	2256	1.872
2230	2257	1.796
2231	2258	1.895
2232	2259	1.794
2233	2260	1.742
2234	2261	1.812
2235	2262	1.799
2236	2263	1.827
2237	2264	1.818
2238	2265	1.804
2239	2266	1.82
2240	2267	1.85
2241	2268	1.823
2242	2269	1.811
2243	2270	1.856
2244	2271	1.833
2245	2272	1.743
2246	2273	1.807
2247	2274	1.766
2248	2275	1.823
2249	2276	1.789
2250	2277	1.848
2251	2278	1.745
2252	2279	1.784
2253	2280	1.874
2254	2281	1.925
2255	2282	1.727
2256	2283	1.841

	Time (sec)	Drawdown (ft)
2257	2284	1.741
2258	2285	1.792
2259	2286	1.891
2260	2287	1.853
2261	2288	1.906
2262	2289	1.983
2263	2290	1.767
2264	2291	1.849
2265	2292	1.87
2266	2293	1.935
2267	2294	1.796
2268	2295	1.871
2269	2296	1.951
2270	2297	1.824
2271	2298	1.779
2272	2299	1.867
2273	2300	1.893
2274	2301	1.779
2275	2302	1.855
2276	2303	1.811
2277	2304	1.771
2278	2305	1.916
2279	2306	1.86
2280	2307	1.907
2281	2308	1.875
2282	2309	1.889
2283	2310	1.816
2284	2311	1.867
2285	2312	1.901
2286	2313	1.883
2287	2314	1.845
2288	2315	1.777
2289	2316	1.737
2290	2317	1.857
2291	2318	1.936
2292	2319	1.816
2293	2320	1.775
2294	2321	1.895
2295	2322	1.738
2296	2323	1.844
2297	2324	1.818
2298	2325	1.786
2299	2326	1.817
2300	2327	1.885
2301	2328	1.775
2302	2329	1.87
2303	2330	1.796

	Time (sec)	Drawdown (ft)
2304	2331	1.639
2305	2332	1.648
2306	2333	1.786
2307	2334	1.692
2308	2335	1.689
2309	2336	1.76
2310	2337	1.704
2311	2338	1.79
2312	2339	1.766
2313	2340	1.716
2314	2341	1.783
2315	2342	1.641
2316	2343	1.632
2317	2344	1.777
2318	2345	1.619
2319	2346	1.711
2320	2347	1.758
2321	2348	1.762
2322	2349	1.685
2323	2350	1.625
2324	2351	1.64
2325	2352	1.688
2326	2353	1.751
2327	2354	1.684
2328	2355	1.616
2329	2356	1.7
2330	2357	1.78
2331	2358	1.64
2332	2359	1.71
2333	2360	1.595
2334	2361	1.657
2335	2362	1.648
2336	2363	1.726
2337	2364	1.69
2338	2365	1.689
2339	2366	1.686
2340	2367	1.727
2341	2368	1.737
2342	2369	1.669
2343	2370	1.62
2344	2371	1.772
2345	2372	1.692
2346	2373	1.661
2347	2374	1.676
2348	2375	1.671
2349	2376	1.745
2350	2377	1.788

	Time (sec)	Drawdown (ft)
2351	2378	1.739
2352	2379	1.763
2353	2380	1.661
2354	2381	1.748
2355	2382	1.584
2356	2383	1.802
2357	2384	1.791
2358	2385	1.724
2359	2386	1.704
2360	2387	1.639
2361	2388	1.772
2362	2389	1.733
2363	2390	1.743
2364	2391	1.779
2365	2392	1.689
2366	2393	1.752
2367	2394	1.754
2368	2395	1.607
2369	2396	1.761
2370	2397	1.611
2371	2398	1.673
2372	2399	1.76
2373	2400	1.689
2374	2401	1.632
2375	2402	1.677
2376	2403	1.655
2377	2404	1.68
2378	2405	1.685
2379	2406	1.722
2380	2407	1.707
2381	2408	1.696
2382	2409	1.656
2383	2410	1.635
2384	2411	1.566
2385	2412	1.648
2386	2413	1.668
2387	2414	1.659
2388	2415	1.601
2389	2416	1.596
2390	2417	1.589
2391	2418	1.597
2392	2419	1.582
2393	2420	1.663
2394	2421	1.609
2395	2422	1.547
2396	2423	1.521
2397	2424	1.505

	Time (sec)	Drawdown (ft)
2398	2425	1.609
2399	2426	1.612
2400	2427	1.559
2401	2428	1.51
2402	2429	1.589
2403	2430	1.653
2404	2431	1.614
2405	2432	1.718
2406	2433	1.54
2407	2434	1.57
2408	2435	1.586
2409	2436	1.562
2410	2437	1.549
2411	2438	1.735
2412	2439	1.529
2413	2440	1.616
2414	2441	1.628
2415	2442	1.597
2416	2443	1.563
2417	2444	1.602
2418	2445	1.644
2419	2446	1.554
2420	2447	1.662
2421	2448	1.578
2422	2449	1.563
2423	2450	1.604
2424	2451	1.627
2425	2452	1.556
2426	2453	1.617
2427	2454	1.557
2428	2455	1.589
2429	2456	1.612
2430	2457	1.554
2431	2458	1.655
2432	2459	1.584
2433	2460	1.615
2434	2461	1.583
2435	2462	1.543
2436	2463	1.591
2437	2464	1.497
2438	2465	1.616
2439	2466	1.593
2440	2467	1.563
2441	2468	1.559
2442	2469	1.66
2443	2470	1.398
2444	2471	1.574

	Time (sec)	Drawdown (ft)
2445	2472	1.516
2446	2473	1.586
2447	2474	1.657
2448	2475	1.537
2449	2476	1.625
2450	2477	1.474
2451	2478	1.674
2452	2479	1.532
2453	2480	1.584
2454	2481	1.582
2455	2482	1.656
2456	2483	1.601
2457	2484	1.507
2458	2485	1.604
2459	2486	1.712
2460	2487	1.608
2461	2488	1.51
2462	2489	1.754
2463	2490	1.541
2464	2491	1.607
2465	2492	1.483
2466	2493	1.58
2467	2494	1.469
2468	2495	1.68
2469	2496	1.562
2470	2497	1.633
2471	2498	1.497
2472	2499	1.579
2473	2500	1.574
2474	2501	1.644
2475	2502	1.607
2476	2503	1.506
2477	2504	1.549
2478	2505	1.499
2479	2506	1.486
2480	2507	1.574
2481	2508	1.567
2482	2509	1.642
2483	2510	1.583
2484	2511	1.58
2485	2512	1.474
2486	2513	1.656
2487	2514	1.519
2488	2515	1.558
2489	2516	1.424
2490	2517	1.529
2491	2518	1.575

	Time (sec)	Drawdown (ft)
2492	2519	1.496
2493	2520	1.633
2494	2521	1.568
2495	2522	1.609
2496	2523	1.582
2497	2524	1.525
2498	2525	1.603
2499	2526	1.591
2500	2527	1.567
2501	2528	1.579
2502	2529	1.66
2503	2530	1.62
2504	2531	1.698
2505	2532	1.675
2506	2533	1.822
2507	2534	1.659
2508	2535	1.66
2509	2536	1.722
2510	2537	1.678
2511	2538	1.551
2512	2539	1.686
2513	2540	1.757
2514	2541	1.712
2515	2542	1.701
2516	2543	1.714
2517	2544	1.639
2518	2545	1.532
2519	2546	1.693
2520	2547	1.543
2521	2548	1.693
2522	2549	1.634
2523	2550	1.65
2524	2551	1.732
2525	2552	1.681
2526	2553	1.605
2527	2554	1.724
2528	2555	1.699
2529	2556	1.682
2530	2557	1.675
2531	2558	1.822
2532	2559	1.659
2533	2560	1.61
2534	2561	1.832
2535	2562	1.644
2536	2563	1.746
2537	2564	1.597
2538	2565	1.681

	Time (sec)	Drawdown (ft)
2539	2566	1.65
2540	2567	1.711
2541	2568	1.76
2542	2569	1.738
2543	2570	1.696
2544	2571	1.678
2545	2572	1.656
2546	2573	1.619
2547	2574	1.845
2548	2575	1.81
2549	2576	1.726
2550	2577	1.657
2551	2578	1.743
2552	2579	1.617
2553	2580	1.788
2554	2581	1.74
2555	2582	1.593
2556	2583	1.646
2557	2584	1.693
2558	2585	1.607
2559	2586	1.71
2560	2587	1.733
2561	2588	1.718
2562	2589	1.713
2563	2590	1.767
2564	2591	1.704
2565	2592	1.653
2566	2593	1.619
2567	2594	1.681
2568	2595	1.716
2569	2596	1.657
2570	2597	1.708
2571	2598	1.678
2572	2599	1.735
2573	2600	1.525
2574	2601	1.7
2575	2602	1.645
2576	2603	1.696
2577	2604	1.677
2578	2605	1.775
2579	2606	1.632
2580	2607	1.593
2581	2608	1.754
2582	2609	1.747
2583	2610	1.722
2584	2611	1.724
2585	2612	1.603

	Time (sec)	Drawdown (ft)
2586	2613	1.687
2587	2614	1.69
2588	2615	1.739
2589	2616	1.749
2590	2617	1.671
2591	2618	1.756
2592	2619	1.613
2593	2620	1.608
2594	2621	1.667
2595	2622	1.694
2596	2623	1.708
2597	2624	1.757
2598	2625	1.7
2599	2626	1.67
2600	2627	1.687
2601	2628	1.79
2602	2629	1.717
2603	2630	1.666
2604	2631	1.694
2605	2632	1.674
2606	2633	1.753
2607	2634	1.758
2608	2635	1.647
2609	2636	1.707
2610	2637	1.691
2611	2638	1.689
2612	2639	1.706
2613	2640	1.746
2614	2641	1.802
2615	2642	1.658
2616	2643	1.716
2617	2644	1.823
2618	2645	1.669
2619	2646	1.571
2620	2647	1.651
2621	2648	1.621
2622	2649	1.715
2623	2650	1.714
2624	2651	1.582
2625	2652	1.715
2626	2653	1.7
2627	2654	1.614
2628	2655	1.552
2629	2656	1.636
2630	2657	1.672
2631	2658	1.611
2632	2659	1.627

	Time (sec)	Drawdown (ft)
2633	2660	1.72
2634	2661	1.629
2635	2662	1.562
2636	2663	1.801
2637	2664	1.61
2638	2665	1.663
2639	2666	1.704
2640	2667	1.622
2641	2668	1.676
2642	2669	1.745
2643	2670	1.73
2644	2671	1.751
2645	2672	1.682
2646	2673	1.654
2647	2674	1.73
2648	2675	1.681
2649	2676	1.705
2650	2677	1.614
2651	2678	1.646
2652	2679	1.685
2653	2680	1.695
2654	2681	1.733
2655	2682	1.712
2656	2683	1.615
2657	2684	1.614
2658	2685	1.751
2659	2686	1.597
2660	2687	1.686
2661	2688	1.673
2662	2689	1.599
2663	2690	1.663
2664	2691	1.773
2665	2692	1.623
2666	2693	1.596
2667	2694	1.773
2668	2695	1.736
2669	2696	1.654
2670	2697	1.764
2671	2698	1.682
2672	2699	1.677
2673	2700	1.739
2674	2701	1.745
2675	2702	1.683
2676	2703	1.724
2677	2704	1.72
2678	2705	1.699
2679	2706	1.707

	Time (sec)	Drawdown (ft)
2680	2707	1.709
2681	2708	1.654
2682	2709	1.673
2683	2710	1.711
2684	2711	1.761
2685	2712	1.581
2686	2713	1.619
2687	2714	1.725
2688	2715	1.646
2689	2716	1.608
2690	2717	1.682
2691	2718	1.692
2692	2719	1.673
2693	2720	1.69
2694	2721	1.689
2695	2722	1.779
2696	2723	1.736
2697	2724	1.619
2698	2725	1.639
2699	2726	1.644
2700	2727	1.725
2701	2728	1.668
2702	2729	1.757
2703	2730	1.73
2704	2731	1.738
2705	2732	1.653
2706	2733	1.646
2707	2734	1.707
2708	2735	1.783
2709	2736	1.603
2710	2737	1.687
2711	2738	1.838
2712	2739	1.704
2713	2740	1.703
2714	2741	1.764
2715	2742	1.733
2716	2743	1.652
2717	2744	1.584
2718	2745	1.715
2719	2746	1.634
2720	2747	1.703
2721	2748	1.778
2722	2749	1.715
2723	2750	1.558
2724	2751	1.736
2725	2752	1.646
2726	2753	1.685

	Time (sec)	Drawdown (ft)
2727	2754	1.654
2728	2755	1.676
2729	2756	1.647
2730	2757	1.652
2731	2758	1.68
2732	2759	1.63
2733	2760	1.738
2734	2761	1.723
2735	2762	1.732
2736	2763	1.647
2737	2764	1.814
2738	2765	1.681
2739	2766	1.711
2740	2767	1.712
2741	2768	1.743
2742	2769	1.669
2743	2770	1.794
2744	2771	1.682
2745	2772	1.655
2746	2773	1.651
2747	2774	1.682
2748	2775	1.556
2749	2776	1.651
2750	2777	1.689
2751	2778	1.729
2752	2779	1.663
2753	2780	1.811
2754	2781	1.756
2755	2782	1.76
2756	2783	1.634
2757	2784	1.645
2758	2785	1.687
2759	2786	1.745
2760	2787	1.697
2761	2788	1.602
2762	2789	1.834
2763	2790	1.692
2764	2791	1.752
2765	2792	1.674
2766	2793	1.634
2767	2794	1.709
2768	2795	1.57
2769	2796	1.666
2770	2797	1.648
2771	2798	1.775
2772	2799	1.77
2773	2800	1.704

	Time (sec)	Drawdown (ft)
2774	2801	1.613
2775	2802	1.689
2776	2803	1.677
2777	2804	1.678
2778	2805	1.666
2779	2806	1.649
2780	2807	1.744
2781	2808	1.825
2782	2809	1.548
2783	2810	1.611
2784	2811	1.654
2785	2812	1.717
2786	2813	1.743
2787	2814	1.529
2788	2815	1.735
2789	2816	1.623
2790	2817	1.658
2791	2818	1.613
2792	2819	1.665
2793	2820	1.765
2794	2821	1.836
2795	2822	1.618
2796	2823	1.589
2797	2824	1.794
2798	2825	1.73
2799	2826	1.632
2800	2827	1.72
2801	2828	1.666
2802	2829	1.752
2803	2830	1.8
2804	2831	1.724
2805	2832	1.691
2806	2833	1.749
2807	2834	1.725
2808	2835	1.661
2809	2836	1.649
2810	2837	1.781
2811	2838	1.623
2812	2839	1.684
2813	2840	1.735
2814	2841	1.688
2815	2842	1.726
2816	2843	1.659
2817	2844	1.71
2818	2845	1.648
2819	2846	1.691
2820	2847	1.696

	Time (sec)	Drawdown (ft)
2821	2848	1.626
2822	2849	1.663
2823	2850	1.64
2824	2851	1.604
2825	2852	1.711
2826	2853	1.472
2827	2854	1.735
2828	2855	1.705
2829	2856	1.669
2830	2857	1.677
2831	2858	1.664
2832	2859	1.701
2833	2860	1.645
2834	2861	1.691
2835	2862	1.737
2836	2863	1.795
2837	2864	1.758
2838	2865	1.641
2839	2866	1.656
2840	2867	1.667
2841	2868	1.749
2842	2869	1.699
2843	2870	1.603
2844	2871	1.529
2845	2872	1.698
2846	2873	1.708
2847	2874	1.759
2848	2875	1.714
2849	2876	1.636
2850	2877	1.597
2851	2878	1.709
2852	2879	1.602
2853	2880	1.689
2854	2881	1.724
2855	2882	1.719
2856	2883	1.7
2857	2884	1.759
2858	2885	1.723
2859	2886	1.735
2860	2887	1.598
2861	2888	1.603
2862	2889	1.575
2863	2890	1.605
2864	2891	1.613
2865	2892	1.544
2866	2893	1.688
2867	2894	1.765

	Time (sec)	Drawdown (ft)
2868	2895	1.796
2869	2896	1.772
2870	2897	1.629
2871	2898	1.725
2872	2899	1.643
2873	2900	1.647
2874	2901	1.647
2875	2902	1.771
2876	2903	1.702
2877	2904	1.741
2878	2905	1.74
2879	2906	1.58
2880	2907	1.681
2881	2908	1.714
2882	2909	1.713
2883	2910	1.598
2884	2911	1.644
2885	2912	1.712
2886	2913	1.764
2887	2914	1.605
2888	2915	1.556
2889	2916	1.679
2890	2917	1.686
2891	2918	1.803
2892	2919	1.684
2893	2920	1.611
2894	2921	1.666
2895	2922	1.831
2896	2923	1.705
2897	2924	1.747
2898	2925	1.658
2899	2926	1.626
2900	2927	1.732
2901	2928	1.685
2902	2929	1.642
2903	2930	1.582
2904	2931	1.617
2905	2932	1.742
2906	2933	1.7
2907	2934	1.708
2908	2935	1.711
2909	2936	1.744
2910	2937	1.697
2911	2938	1.6
2912	2939	1.83
2913	2940	1.67
2914	2941	1.66

	Time (sec)	Drawdown (ft)
2915	2942	1.71
2916	2943	1.739
2917	2944	1.696
2918	2945	1.579
2919	2946	1.692
2920	2947	1.763
2921	2948	1.735
2922	2949	1.737
2923	2950	1.603
2924	2951	1.706
2925	2952	1.622
2926	2953	1.727
2927	2954	1.687
2928	2955	1.569
2929	2956	1.612
2930	2957	1.737
2931	2958	1.728
2932	2959	1.684
2933	2960	1.584
2934	2961	1.702
2935	2962	1.64
2936	2963	1.711
2937	2964	1.739
2938	2965	1.76
2939	2966	1.614
2940	2967	1.769
2941	2968	1.623
2942	2969	1.678
2943	2970	1.696
2944	2971	1.685
2945	2972	1.672
2946	2973	1.614
2947	2974	1.718
2948	2975	1.727
2949	2976	1.646
2950	2977	1.714
2951	2978	1.657
2952	2979	1.681
2953	2980	1.657
2954	2981	1.59
2955	2982	1.623
2956	2983	1.593
2957	2984	1.674
2958	2985	1.771
2959	2986	1.694
2960	2987	1.655
2961	2988	1.675

	Time (sec)	Drawdown (ft)
2962	2989	1.708
2963	2990	1.614
2964	2991	1.661
2965	2992	1.67
2966	2993	1.653
2967	2994	1.671
2968	2995	1.712
2969	2996	1.768
2970	2997	1.633
2971	2998	1.737
2972	2999	1.678
2973	3000	1.616
2974	3001	1.666
2975	3002	1.781
2976	3003	1.597
2977	3004	1.688
2978	3005	1.705
2979	3006	1.565
2980	3007	1.69
2981	3008	1.579
2982	3009	1.606
2983	3010	1.551
2984	3011	1.683
2985	3012	1.524
2986	3013	1.595
2987	3014	1.771
2988	3015	1.678
2989	3016	1.74
2990	3017	1.764
2991	3018	1.76
2992	3019	1.597
2993	3020	1.752
2994	3021	1.672
2995	3022	1.642
2996	3023	1.608
2997	3024	1.726
2998	3025	1.653
2999	3026	1.639
3000	3027	1.68
3001	3028	1.757
3002	3029	1.719
3003	3030	1.718
3004	3031	1.69
3005	3032	1.577
3006	3033	1.634
3007	3034	1.695
3008	3035	1.678

	Time (sec)	Drawdown (ft)
3009	3036	1.754
3010	3037	1.582
3011	3038	1.681
3012	3039	1.615
3013	3040	1.584
3014	3041	1.714
3015	3042	1.697
3016	3043	1.762
3017	3044	1.694
3018	3045	1.642
3019	3046	1.702
3020	3047	1.635
3021	3048	1.626
3022	3049	1.7
3023	3050	1.575
3024	3051	1.652
3025	3052	1.655
3026	3053	1.731
3027	3054	1.649
3028	3055	1.765
3029	3056	1.739
3030	3057	1.597
3031	3058	1.824
3032	3059	1.729
3033	3060	1.653
3034	3061	1.738
3035	3062	1.595
3036	3063	1.673
3037	3064	1.711
3038	3065	1.73
3039	3066	1.656
3040	3067	1.716
3041	3068	1.712
3042	3069	1.743
3043	3070	1.761
3044	3071	1.714
3045	3072	1.734
3046	3073	1.679
3047	3074	1.702
3048	3075	1.614
3049	3076	1.735
3050	3077	1.76
3051	3078	1.7
3052	3079	1.742
3053	3080	1.637
3054	3081	1.662
3055	3082	1.703

	Time (sec)	Drawdown (ft)
3056	3083	1.698
3057	3084	1.636
3058	3085	1.611
3059	3086	1.735
3060	3087	1.72
3061	3088	1.736
3062	3089	1.669
3063	3090	1.693
3064	3091	1.683
3065	3092	1.606
3066	3093	1.773
3067	3094	1.693
3068	3095	1.678
3069	3096	1.624
3070	3097	1.696
3071	3098	1.691
3072	3099	1.673
3073	3100	1.705
3074	3101	1.619
3075	3102	1.526
3076	3103	1.713
3077	3104	1.701
3078	3105	1.687
3079	3106	1.841
3080	3107	1.589
3081	3108	1.659
3082	3109	1.73
3083	3110	1.675
3084	3111	1.677
3085	3112	1.59
3086	3113	1.724
3087	3114	1.644
3088	3115	1.678
3089	3116	1.725
3090	3117	1.647
3091	3118	1.656
3092	3119	1.69
3093	3120	1.691
3094	3121	1.719
3095	3122	1.627
3096	3123	1.693
3097	3124	1.712
3098	3125	1.66
3099	3126	1.581
3100	3127	1.633
3101	3128	1.618
3102	3129	1.615

	Time (sec)	Drawdown (ft)
3103	3130	1.75
3104	3131	1.747
3105	3132	1.673
3106	3133	1.597
3107	3134	1.691
3108	3135	1.759
3109	3136	1.596
3110	3137	1.656
3111	3138	1.639
3112	3139	1.658
3113	3140	1.637
3114	3141	1.76
3115	3142	1.662
3116	3143	1.734
3117	3144	1.731
3118	3145	1.649
3119	3146	1.745
3120	3147	1.775
3121	3148	1.794
3122	3149	1.68
3123	3150	1.792
3124	3151	1.662
3125	3152	1.724
3126	3153	1.644
3127	3154	1.612
3128	3155	1.641
3129	3156	1.616
3130	3157	1.715
3131	3158	1.654
3132	3159	1.674
3133	3160	1.736
3134	3161	1.584
3135	3162	1.646
3136	3163	1.727
3137	3164	1.636
3138	3165	1.77
3139	3166	1.737
3140	3167	1.67
3141	3168	1.657
3142	3169	1.7
3143	3170	1.687
3144	3171	1.613
3145	3172	1.759
3146	3173	1.601
3147	3174	1.664
3148	3175	1.726
3149	3176	1.804

	Time (sec)	Drawdown (ft)
3150	3177	1.598
3151	3178	1.725
3152	3179	1.636
3153	3180	1.672
3154	3181	1.589
3155	3182	1.667
3156	3183	1.566
3157	3184	1.611
3158	3185	1.65
3159	3186	1.66
3160	3187	1.614
3161	3188	1.743
3162	3189	1.678
3163	3190	1.785
3164	3191	1.679
3165	3192	1.76
3166	3193	1.742
3167	3194	1.556
3168	3195	1.654
3169	3196	1.735
3170	3197	1.545
3171	3198	1.6
3172	3199	1.64
3173	3200	1.653
3174	3201	1.755
3175	3202	1.566
3176	3203	1.704
3177	3204	1.861
3178	3205	1.61
3179	3206	1.766
3180	3207	1.621
3181	3208	1.64
3182	3209	1.65
3183	3210	1.75
3184	3211	1.615
3185	3212	1.648
3186	3213	1.719
3187	3214	1.634
3188	3215	1.721
3189	3216	1.779
3190	3217	1.813
3191	3218	1.621
3192	3219	1.767
3193	3220	1.691
3194	3221	1.66
3195	3222	1.651
3196	3223	1.744

	Time (sec)	Drawdown (ft)
3197	3224	1.635
3198	3225	1.608
3199	3226	1.792
3200	3227	1.676
3201	3228	1.604
3202	3229	1.77
3203	3230	1.668
3204	3231	1.65
3205	3232	1.697
3206	3233	1.685
3207	3234	1.72
3208	3235	1.69
3209	3236	1.744
3210	3237	1.65
3211	3238	1.68
3212	3239	1.614
3213	3240	1.761
3214	3241	1.709
3215	3242	1.786
3216	3243	1.637
3217	3244	1.747
3218	3245	1.769
3219	3246	1.718
3220	3247	1.716
3221	3248	1.532
3222	3249	1.688
3223	3250	1.569
3224	3251	1.67
3225	3252	1.696
3226	3253	1.769
3227	3254	1.738
3228	3255	1.644
3229	3256	1.584
3230	3257	1.729
3231	3258	1.714
3232	3259	1.59
3233	3260	1.645
3234	3261	1.67
3235	3262	1.545
3236	3263	1.713
3237	3264	1.739
3238	3265	1.604
3239	3266	1.584
3240	3267	1.664
3241	3268	1.62
3242	3269	1.756
3243	3270	1.755

	Time (sec)	Drawdown (ft)
3244	3271	1.769
3245	3272	1.753
3246	3273	1.699
3247	3274	1.754
3248	3275	1.67
3249	3276	1.681
3250	3277	1.779
3251	3278	1.682
3252	3279	1.737
3253	3280	1.644
3254	3281	1.734
3255	3282	1.687
3256	3283	1.685
3257	3284	1.765
3258	3285	1.688
3259	3286	1.748
3260	3287	1.682
3261	3288	1.684
3262	3289	1.674
3263	3290	1.608
3264	3291	1.642
3265	3292	1.759
3266	3293	1.655
3267	3294	1.667
3268	3295	1.7
3269	3296	1.692
3270	3297	1.661
3271	3298	1.771
3272	3299	1.679
3273	3300	1.746
3274	3301	1.572
3275	3302	1.703
3276	3303	1.669
3277	3304	1.775
3278	3305	1.672
3279	3306	1.614
3280	3307	1.738
3281	3308	1.691
3282	3309	1.623
3283	3310	1.63
3284	3311	1.683
3285	3312	1.689
3286	3313	1.587
3287	3314	1.792
3288	3315	1.744
3289	3316	1.713
3290	3317	1.634

	Time (sec)	Drawdown (ft)
3291	3318	1.754
3292	3319	1.748
3293	3320	1.609
3294	3321	1.836
3295	3322	1.679
3296	3323	1.727
3297	3324	1.66
3298	3325	1.752
3299	3326	1.781
3300	3327	1.766
3301	3328	1.677
3302	3329	1.627
3303	3330	1.71
3304	3331	1.747
3305	3332	1.669
3306	3333	1.722
3307	3334	1.647
3308	3335	1.682
3309	3336	1.659
3310	3337	1.687
3311	3338	1.669
3312	3339	1.686
3313	3340	1.683
3314	3341	1.707
3315	3342	1.703
3316	3343	1.779
3317	3344	1.693
3318	3345	1.697
3319	3346	1.758
3320	3347	1.729
3321	3348	1.704
3322	3349	1.734
3323	3350	1.681
3324	3351	1.639
3325	3352	1.632
3326	3353	1.64
3327	3354	1.577
3328	3355	1.589
3329	3356	1.623
3330	3357	1.578
3331	3358	1.747
3332	3359	1.65
3333	3360	1.657
3334	3361	1.729
3335	3362	1.688
3336	3363	1.679
3337	3364	1.662

	Time (sec)	Drawdown (ft)
3338	3365	1.666
3339	3366	1.762
3340	3367	1.627
3341	3368	1.64
3342	3369	1.827
3343	3370	1.628
3344	3371	1.742
3345	3372	1.711
3346	3373	1.614
3347	3374	1.681
3348	3375	1.733
3349	3376	1.664
3350	3377	1.735
3351	3378	1.709
3352	3379	1.652
3353	3380	1.642
3354	3381	1.694
3355	3382	1.701
3356	3383	1.697
3357	3384	1.694
3358	3385	1.824
3359	3386	1.674
3360	3387	1.677
3361	3388	1.635
3362	3389	1.627
3363	3390	1.679
3364	3391	1.733
3365	3392	1.76
3366	3393	1.706
3367	3394	1.693
3368	3395	1.667
3369	3396	1.729
3370	3397	1.734
3371	3398	1.627
3372	3399	1.725
3373	3400	1.641
3374	3401	1.591
3375	3402	1.765
3376	3403	1.711
3377	3404	1.682
3378	3405	1.621
3379	3406	1.726
3380	3407	1.652
3381	3408	1.694
3382	3409	1.659
3383	3410	1.658
3384	3411	1.675

	Time (sec)	Drawdown (ft)
3385	3412	1.697
3386	3413	1.712
3387	3414	1.61
3388	3415	1.644
3389	3416	1.707
3390	3417	1.721
3391	3418	1.644
3392	3419	1.718
3393	3420	1.681
3394	3421	1.642
3395	3422	1.712
3396	3423	1.661
3397	3424	1.694
3398	3425	1.66
3399	3426	1.642
3400	3427	1.619
3401	3428	1.606
3402	3429	1.754
3403	3430	1.691
3404	3431	1.731
3405	3432	1.642
3406	3433	1.668
3407	3434	1.652
3408	3435	1.681
3409	3436	1.697
3410	3437	1.634
3411	3438	1.725
3412	3439	1.691
3413	3440	1.636
3414	3441	1.702
3415	3442	1.689
3416	3443	1.652
3417	3444	1.653
3418	3445	1.616
3419	3446	1.725
3420	3447	1.732
3421	3448	1.711
3422	3449	1.714
3423	3450	1.659
3424	3451	1.674
3425	3452	1.715
3426	3453	1.72
3427	3454	1.736
3428	3455	1.676
3429	3456	1.671
3430	3457	1.773
3431	3458	1.73

	Time (sec)	Drawdown (ft)
3432	3459	1.585
3433	3460	1.606
3434	3461	1.797
3435	3462	1.685
3436	3463	1.644
3437	3464	1.685
3438	3465	1.541
3439	3466	1.783
3440	3467	1.598
3441	3468	1.765
3442	3469	1.691
3443	3470	1.719
3444	3471	1.69
3445	3472	1.616
3446	3473	1.662
3447	3474	1.655
3448	3475	1.719
3449	3476	1.749
3450	3477	1.793
3451	3478	1.682
3452	3479	1.728
3453	3480	1.739
3454	3481	1.614
3455	3482	1.837
3456	3483	1.645
3457	3484	1.6
3458	3485	1.691
3459	3486	1.856
3460	3487	1.921
3461	3488	2.056
3462	3489	2.238
3463	3490	2.379
3464	3491	2.644
3465	3492	2.87
3466	3493	3.12
3467	3494	3.362
3468	3495	3.591
3469	3496	3.759
3470	3497	3.971
3471	3498	4.164
3472	3499	4.368
3473	3500	4.568
3474	3501	4.624
3475	3502	4.757
3476	3503	4.919
3477	3504	4.986
3478	3505	5.154

	Time (sec)	Drawdown (ft)
3479	3506	5.198
3480	3507	5.288
3481	3508	5.302
3482	3509	5.367
3483	3510	5.421
3484	3511	5.361
3485	3512	5.42
3486	3513	5.489
3487	3514	5.482
3488	3515	5.479
3489	3516	5.544
3490	3517	5.559
3491	3518	5.53
3492	3519	5.602
3493	3520	5.593
3494	3521	5.6
3495	3522	5.572
3496	3523	5.605
3497	3524	5.535
3498	3525	5.565
3499	3526	5.543
3500	3527	5.539
3501	3528	5.57
3502	3529	5.546
3503	3530	5.525
3504	3531	5.494
3505	3532	5.585
3506	3533	5.464
3507	3534	5.378
3508	3535	5.361
3509	3536	5.356
3510	3537	5.338
3511	3538	5.267
3512	3539	5.291
3513	3540	5.216
3514	3541	5.225
3515	3542	5.135
3516	3543	5.139
3517	3544	5.06
3518	3545	5.038
3519	3546	5.038
3520	3547	4.943
3521	3548	4.951
3522	3549	4.975
3523	3550	4.979
3524	3551	4.912
3525	3552	4.857

	Time (sec)	Drawdown (ft)
3526	3553	4.884
3527	3554	4.898
3528	3555	4.813
3529	3556	4.829
3530	3557	4.767
3531	3558	4.776
3532	3559	4.761
3533	3560	4.715
3534	3561	4.696
3535	3562	4.703
3536	3563	4.735
3537	3564	4.671
3538	3565	4.676
3539	3566	4.62
3540	3567	4.636
3541	3568	4.646
3542	3569	4.631
3543	3570	4.6
3544	3571	4.623
3545	3572	4.658
3546	3573	4.646
3547	3574	4.596
3548	3575	4.553
3549	3576	4.615
3550	3577	4.546
3551	3578	4.58
3552	3579	4.602
3553	3580	4.546
3554	3581	4.564
3555	3582	4.565
3556	3583	4.524
3557	3584	4.515
3558	3585	4.562
3559	3586	4.578
3560	3587	4.502
3561	3588	4.496
3562	3589	4.56
3563	3590	4.522
3564	3591	4.519
3565	3592	4.599
3566	3593	4.523
3567	3594	4.541
3568	3595	4.556
3569	3596	4.546
3570	3597	4.473
3571	3598	4.503
3572	3599	4.515

	Time (sec)	Drawdown (ft)
3573	3600	4.43
3574	3601	4.422
3575	3602	4.476
3576	3603	4.465
3577	3604	4.389
3578	3605	4.439
3579	3606	4.415
3580	3607	4.362
3581	3608	4.387
3582	3609	4.36
3583	3610	4.346
3584	3611	4.401
3585	3612	4.388
3586	3613	4.316
3587	3614	4.292
3588	3615	4.327
3589	3616	4.245
3590	3617	4.254
3591	3618	4.328
3592	3619	4.277
3593	3620	4.287
3594	3621	4.328
3595	3622	4.314
3596	3623	4.287
3597	3624	4.318
3598	3625	4.316
3599	3626	4.296
3600	3627	4.317
3601	3628	4.273
3602	3629	4.263
3603	3630	4.287
3604	3631	4.294
3605	3632	4.27
3606	3633	4.304
3607	3634	4.278
3608	3635	4.277
3609	3636	4.267
3610	3637	4.218
3611	3638	4.247
3612	3639	4.251
3613	3640	4.263
3614	3641	4.298
3615	3642	4.257
3616	3643	4.282
3617	3644	4.287
3618	3645	4.242
3619	3646	4.21

	Time (sec)	Drawdown (ft)
3620	3647	4.26
3621	3648	4.231
3622	3649	4.23
3623	3650	4.24
3624	3651	4.288
3625	3652	4.247
3626	3653	4.263
3627	3654	4.269
3628	3655	4.222
3629	3656	4.177
3630	3657	4.191
3631	3658	4.218
3632	3659	4.221
3633	3660	4.265
3634	3661	4.215
3635	3662	4.223
3636	3663	4.273
3637	3664	4.245
3638	3665	4.168
3639	3666	4.259
3640	3667	4.243
3641	3668	4.289
3642	3669	4.176
3643	3670	4.244
3644	3671	4.235
3645	3672	4.238
3646	3673	4.227
3647	3674	4.236
3648	3675	4.188
3649	3676	4.265
3650	3677	4.252
3651	3678	4.203
3652	3679	4.172
3653	3680	4.259
3654	3681	4.198
3655	3682	4.198
3656	3683	4.242
3657	3684	4.242
3658	3685	4.152
3659	3686	4.202
3660	3687	4.215
3661	3688	4.184
3662	3689	4.192
3663	3690	4.234
3664	3691	4.187
3665	3692	4.222
3666	3693	4.275

	Time (sec)	Drawdown (ft)
3667	3694	4.253
3668	3695	4.156
3669	3696	4.227
3670	3697	4.183
3671	3698	4.169
3672	3699	4.246
3673	3700	4.235
3674	3701	4.22
3675	3702	4.228
3676	3703	4.239
3677	3704	4.203
3678	3705	4.261
3679	3706	4.243
3680	3707	4.224
3681	3708	4.244
3682	3709	4.205
3683	3710	4.205
3684	3711	4.154
3685	3712	4.176
3686	3713	4.23
3687	3714	4.176
3688	3715	4.218
3689	3716	4.186
3690	3717	4.234
3691	3718	4.236
3692	3719	4.23
3693	3720	4.221
3694	3721	4.195
3695	3722	4.185
3696	3723	4.224
3697	3724	4.167
3698	3725	4.145
3699	3726	4.238
3700	3727	4.238
3701	3728	4.186
3702	3729	4.188
3703	3730	4.243
3704	3731	4.143
3705	3732	4.227
3706	3733	4.206
3707	3734	4.167
3708	3735	4.215
3709	3736	4.195
3710	3737	4.201
3711	3738	4.158
3712	3739	4.21
3713	3740	4.223

	Time (sec)	Drawdown (ft)
3714	3741	4.172
3715	3742	4.26
3716	3743	4.213
3717	3744	4.19
3718	3745	4.199
3719	3746	4.232
3720	3747	4.222
3721	3748	4.162
3722	3749	4.182
3723	3750	4.152
3724	3751	4.207
3725	3752	4.192
3726	3753	4.197
3727	3754	4.158
3728	3755	4.221
3729	3756	4.175
3730	3757	4.143
3731	3758	4.164
3732	3759	4.178
3733	3760	4.149
3734	3761	4.182
3735	3762	4.16
3736	3763	4.168
3737	3764	4.177
3738	3765	4.224
3739	3766	4.185
3740	3767	4.109
3741	3768	4.2
3742	3769	4.187
3743	3770	4.128
3744	3771	4.185
3745	3772	4.179
3746	3773	4.267
3747	3774	4.122
3748	3775	4.195
3749	3776	4.184
3750	3777	4.181
3751	3778	4.199
3752	3779	4.18
3753	3780	4.176
3754	3781	4.201
3755	3782	4.14
3756	3783	4.168
3757	3784	4.132
3758	3785	4.16
3759	3786	4.225
3760	3787	4.172

	Time (sec)	Drawdown (ft)
3761	3788	4.187
3762	3789	4.201
3763	3790	4.187
3764	3791	4.23
3765	3792	4.202
3766	3793	4.245
3767	3794	4.251
3768	3795	4.273
3769	3796	4.182
3770	3797	4.262
3771	3798	4.277
3772	3799	4.28
3773	3800	4.216
3774	3801	4.261
3775	3802	4.279
3776	3803	4.267
3777	3804	4.271
3778	3805	4.315
3779	3806	4.262
3780	3807	4.327
3781	3808	4.294
3782	3809	4.389
3783	3810	4.378
3784	3811	4.36
3785	3812	4.342
3786	3813	4.385
3787	3814	4.45
3788	3815	4.429
3789	3816	4.479
3790	3817	4.583
3791	3818	4.541
3792	3819	4.639
3793	3820	4.69
3794	3821	4.703
3795	3822	4.768
3796	3823	4.795
3797	3824	4.845
3798	3825	4.858
3799	3826	4.943
3800	3827	5.028
3801	3828	5.075
3802	3829	5.075
3803	3830	5.168
3804	3831	5.197
3805	3832	5.187
3806	3833	5.248
3807	3834	5.262

	Time (sec)	Drawdown (ft)
3808	3835	5.292
3809	3836	5.327
3810	3837	5.364
3811	3838	5.458
3812	3839	5.434
3813	3840	5.475
3814	3841	5.548
3815	3842	5.507
3816	3843	5.552
3817	3844	5.639
3818	3845	5.628
3819	3846	5.619
3820	3847	5.692
3821	3848	5.702
3822	3849	5.713
3823	3850	5.742
3824	3851	5.775
3825	3852	5.753
3826	3853	5.778
3827	3854	5.816
3828	3855	5.785
3829	3856	5.801
3830	3857	5.833
3831	3858	5.827
3832	3859	5.833
3833	3860	5.866
3834	3861	5.848
3835	3862	5.888
3836	3863	5.846
3837	3864	5.821
3838	3865	5.879
3839	3866	5.912
3840	3867	5.911
3841	3868	5.895
3842	3869	5.871
3843	3870	5.948
3844	3871	5.929
3845	3872	5.867
3846	3873	5.94
3847	3874	5.97
3848	3875	5.895
3849	3876	5.953
3850	3877	5.952
3851	3878	5.997
3852	3879	5.937
3853	3880	5.957
3854	3881	5.934

	Time (sec)	Drawdown (ft)
3855	3882	5.944
3856	3883	5.949
3857	3884	5.943
3858	3885	5.955
3859	3886	5.933
3860	3887	5.972
3861	3888	5.973
3862	3889	5.92
3863	3890	5.895
3864	3891	5.993
3865	3892	5.934
3866	3893	5.946
3867	3894	6.005
3868	3895	5.987
3869	3896	5.94
3870	3897	5.954
3871	3898	5.967
3872	3899	5.916
3873	3900	5.905
3874	3901	5.957
3875	3902	5.972
3876	3903	5.952
3877	3904	5.95
3878	3905	5.929
3879	3906	5.929
3880	3907	5.954
3881	3908	5.956
3882	3909	5.975
3883	3910	5.974
3884	3911	5.973
3885	3912	5.962
3886	3913	5.906
3887	3914	5.936
3888	3915	5.957
3889	3916	5.894
3890	3917	5.934
3891	3918	5.952
3892	3919	5.961
3893	3920	5.899
3894	3921	5.924
3895	3922	5.952
3896	3923	5.93
3897	3924	5.942
3898	3925	5.962
3899	3926	5.897
3900	3927	5.971
3901	3928	5.948

	Time (sec)	Drawdown (ft)
3902	3929	5.922
3903	3930	5.908
3904	3931	5.953
3905	3932	5.942
3906	3933	5.913
3907	3934	5.958
3908	3935	5.952
3909	3936	5.933
3910	3937	5.888
3911	3938	5.944
3912	3939	5.95
3913	3940	5.953
3914	3941	5.983
3915	3942	5.935
3916	3943	5.901
3917	3944	5.903
3918	3945	5.941
3919	3946	5.881
3920	3947	5.907
3921	3948	5.937
3922	3949	5.889
3923	3950	5.904
3924	3951	5.903
3925	3952	5.927
3926	3953	5.875
3927	3954	5.93
3928	3955	5.901
3929	3956	5.859
3930	3957	5.909
3931	3958	5.932
3932	3959	5.897
3933	3960	5.89
3934	3961	5.919
3935	3962	5.883
3936	3963	5.867
3937	3964	5.977
3938	3965	5.912
3939	3966	5.874
3940	3967	5.913
3941	3968	5.968
3942	3969	5.904
3943	3970	5.914
3944	3971	5.955
3945	3972	5.927
3946	3973	5.883
3947	3974	5.911
3948	3975	5.851

	Time (sec)	Drawdown (ft)
3949	3976	5.905
3950	3977	5.895
3951	3978	5.892
3952	3979	5.912
3953	3980	5.904
3954	3981	5.913
3955	3982	5.892
3956	3983	5.893
3957	3984	5.92
3958	3985	5.941
3959	3986	5.856
3960	3987	5.913
3961	3988	5.917
3962	3989	5.869
3963	3990	5.909
3964	3991	5.924
3965	3992	5.899
3966	3993	5.903
3967	3994	5.883
3968	3995	5.873
3969	3996	5.895
3970	3997	5.901
3971	3998	5.873
3972	3999	5.83
3973	4000	5.901
3974	4001	5.897
3975	4002	5.887
3976	4003	5.824
3977	4004	5.877
3978	4005	5.897
3979	4006	5.888
3980	4007	5.874
3981	4008	5.864
3982	4009	5.895
3983	4010	5.858
3984	4011	5.86
3985	4012	5.866
3986	4013	5.865
3987	4014	5.909
3988	4015	5.907
3989	4016	5.843
3990	4017	5.835
3991	4018	5.886
3992	4019	5.836
3993	4020	5.855
3994	4021	5.858
3995	4022	5.905

	Time (sec)	Drawdown (ft)
3996	4023	5.879
3997	4024	5.885
3998	4025	5.872
3999	4026	5.877
4000	4027	5.885
4001	4028	5.892
4002	4029	5.881
4003	4030	5.879
4004	4031	5.863
4005	4032	5.878
4006	4033	5.886
4007	4034	5.865
4008	4035	5.841
4009	4036	5.873
4010	4037	5.869
4011	4038	5.876
4012	4039	5.895
4013	4040	5.835
4014	4041	5.897
4015	4042	5.856
4016	4043	5.85
4017	4044	5.907
4018	4045	5.85
4019	4046	5.846
4020	4047	5.863
4021	4048	5.831
4022	4049	5.828
4023	4050	5.88
4024	4051	5.836
4025	4052	5.821
4026	4053	5.83
4027	4054	5.876
4028	4055	5.83
4029	4056	5.845
4030	4057	5.851
4031	4058	5.889
4032	4059	5.859
4033	4060	5.858
4034	4061	5.814
4035	4062	5.88
4036	4063	5.868
4037	4064	5.86
4038	4065	5.864
4039	4066	5.829
4040	4067	5.874
4041	4068	5.911
4042	4069	5.844

	Time (sec)	Drawdown (ft)
4043	4070	5.834
4044	4071	5.897
4045	4072	5.871
4046	4073	5.853
4047	4074	5.867
4048	4075	5.899
4049	4076	5.896
4050	4077	5.853
4051	4078	5.898
4052	4079	5.855
4053	4080	5.813
4054	4081	5.853
4055	4082	5.841
4056	4083	5.832
4057	4084	5.87
4058	4085	5.83
4059	4086	5.839
4060	4087	5.857
4061	4088	5.862
4062	4089	5.841
4063	4090	5.847
4064	4091	5.869
4065	4092	5.866
4066	4093	5.891
4067	4094	5.842
4068	4095	5.839
4069	4096	5.799
4070	4097	5.846
4071	4098	5.878
4072	4099	5.897
4073	4100	5.822
4074	4101	5.896
4075	4102	5.857
4076	4103	5.811
4077	4104	5.899
4078	4105	5.872
4079	4106	5.832
4080	4107	5.845
4081	4108	5.842
4082	4109	5.852
4083	4110	5.84
4084	4111	5.853
4085	4112	5.819
4086	4113	5.798
4087	4114	5.849
4088	4115	5.844
4089	4116	5.822

	Time (sec)	Drawdown (ft)
4090	4117	5.834
4091	4118	5.824
4092	4119	5.871
4093	4120	5.791
4094	4121	5.883
4095	4122	5.834
4096	4123	5.823
4097	4124	5.832
4098	4125	5.863
4099	4126	5.829
4100	4127	5.79
4101	4128	5.823
4102	4129	5.793
4103	4130	5.854
4104	4131	5.828
4105	4132	5.813
4106	4133	5.848
4107	4134	5.82
4108	4135	5.805
4109	4136	5.801
4110	4137	5.823
4111	4138	5.853
4112	4139	5.822
4113	4140	5.854
4114	4141	5.849
4115	4142	5.825
4116	4143	5.819
4117	4144	5.88
4118	4145	5.836
4119	4146	5.805
4120	4147	5.842
4121	4148	5.806
4122	4149	5.8
4123	4150	5.853
4124	4151	5.866
4125	4152	5.827
4126	4153	5.836
4127	4154	5.831
4128	4155	5.839
4129	4156	5.803
4130	4157	5.852
4131	4158	5.83
4132	4159	5.829
4133	4160	5.792
4134	4161	5.818
4135	4162	5.851
4136	4163	5.811

	Time (sec)	Drawdown (ft)
4137	4164	5.845
4138	4165	5.827
4139	4166	5.81
4140	4167	5.84
4141	4168	5.845
4142	4169	5.807
4143	4170	5.804
4144	4171	5.849
4145	4172	5.849
4146	4173	5.797
4147	4174	5.821
4148	4175	5.792
4149	4176	5.787
4150	4177	5.845
4151	4178	5.835
4152	4179	5.816
4153	4180	5.815
4154	4181	5.843
4155	4182	5.829
4156	4183	5.816
4157	4184	5.842
4158	4185	5.788
4159	4186	5.806
4160	4187	5.847
4161	4188	5.829
4162	4189	5.814
4163	4190	5.79
4164	4191	5.847
4165	4192	5.811
4166	4193	5.781
4167	4194	5.84
4168	4195	5.81
4169	4196	5.828
4170	4197	5.805
4171	4198	5.812
4172	4199	5.793
4173	4200	5.824
4174	4201	5.82
4175	4202	5.78
4176	4203	5.848
4177	4204	5.833
4178	4205	5.776
4179	4206	5.744
4180	4207	5.785
4181	4208	5.722
4182	4209	5.659
4183	4210	5.709

	Time (sec)	Drawdown (ft)
4184	4211	5.69
4185	4212	5.669
4186	4213	5.698
4187	4214	5.693
4188	4215	5.677
4189	4216	5.656
4190	4217	5.605
4191	4218	5.609
4192	4219	5.592
4193	4220	5.632
4194	4221	5.632
4195	4222	5.588
4196	4223	5.59
4197	4224	5.616
4198	4225	5.601
4199	4226	5.583
4200	4227	5.578
4201	4228	5.58
4202	4229	5.612
4203	4230	5.576
4204	4231	5.607
4205	4232	5.552
4206	4233	5.555
4207	4234	5.573
4208	4235	5.543
4209	4236	5.537
4210	4237	5.605
4211	4238	5.539
4212	4239	5.533
4213	4240	5.6
4214	4241	5.568
4215	4242	5.578
4216	4243	5.557
4217	4244	5.521
4218	4245	5.525
4219	4246	5.482
4220	4247	5.547
4221	4248	5.546
4222	4249	5.535
4223	4250	5.572
4224	4251	5.521
4225	4252	5.519
4226	4253	5.566
4227	4254	5.516
4228	4255	5.542
4229	4256	5.54
4230	4257	5.553

	Time (sec)	Drawdown (ft)
4231	4258	5.51
4232	4259	5.528
4233	4260	5.516
4234	4261	5.546
4235	4262	5.557
4236	4263	5.539
4237	4264	5.546
4238	4265	5.557
4239	4266	5.54
4240	4267	5.554
4241	4268	5.51
4242	4269	5.54
4243	4270	5.507
4244	4271	5.504
4245	4272	5.455
4246	4273	5.423
4247	4274	5.418
4248	4275	5.385
4249	4276	5.371
4250	4277	5.347
4251	4278	5.274
4252	4279	5.257
4253	4280	5.293
4254	4281	5.221
4255	4282	5.171
4256	4283	5.179
4257	4284	5.182
4258	4285	5.114
4259	4286	5.125
4260	4287	5.106
4261	4288	5.122
4262	4289	5.13
4263	4290	5.097
4264	4291	5.055
4265	4292	5.077
4266	4293	5.03
4267	4294	5.027
4268	4295	4.966
4269	4296	5.031
4270	4297	5.012
4271	4298	5.006
4272	4299	4.977
4273	4300	4.998
4274	4301	4.937
4275	4302	4.962
4276	4303	4.952
4277	4304	4.93

	Time (sec)	Drawdown (ft)
4278	4305	4.934
4279	4306	4.929
4280	4307	4.948
4281	4308	4.884
4282	4309	4.991
4283	4310	4.94
4284	4311	4.857
4285	4312	4.917
4286	4313	4.951
4287	4314	4.927
4288	4315	4.913
4289	4316	4.909
4290	4317	4.9
4291	4318	4.899
4292	4319	4.961
4293	4320	4.916
4294	4321	4.891
4295	4322	4.939
4296	4323	4.903
4297	4324	4.861
4298	4325	4.921
4299	4326	4.912
4300	4327	4.875
4301	4328	4.878
4302	4329	4.925
4303	4330	4.864
4304	4331	4.841
4305	4332	4.899
4306	4333	4.905
4307	4334	4.871
4308	4335	4.886
4309	4336	4.907
4310	4337	4.869
4311	4338	4.864
4312	4339	4.869
4313	4340	4.87
4314	4341	4.86
4315	4342	4.903
4316	4343	4.927
4317	4344	4.838
4318	4345	4.883
4319	4346	4.94
4320	4347	4.864
4321	4348	4.905
4322	4349	4.934
4323	4350	4.856
4324	4351	4.853

	Time (sec)	Drawdown (ft)
4325	4352	4.913
4326	4353	4.914
4327	4354	4.82
4328	4355	4.868
4329	4356	4.837
4330	4357	4.796
4331	4358	4.804
4332	4359	4.788
4333	4360	4.805
4334	4361	4.835
4335	4362	4.829
4336	4363	4.809
4337	4364	4.796
4338	4365	4.857
4339	4366	4.803
4340	4367	4.794
4341	4368	4.834
4342	4369	4.811
4343	4370	4.74
4344	4371	4.798
4345	4372	4.862
4346	4373	4.803
4347	4374	4.783
4348	4375	4.834
4349	4376	4.805
4350	4377	4.801
4351	4378	4.793
4352	4379	4.799
4353	4380	4.763
4354	4381	4.794
4355	4382	4.828
4356	4383	4.783
4357	4384	4.778
4358	4385	4.785
4359	4386	4.797
4360	4387	4.763
4361	4388	4.815
4362	4389	4.788
4363	4390	4.785
4364	4391	4.824
4365	4392	4.76
4366	4393	4.777
4367	4394	4.845
4368	4395	4.77
4369	4396	4.763
4370	4397	4.804
4371	4398	4.798

	Time (sec)	Drawdown (ft)
4372	4399	4.784
4373	4400	4.819
4374	4401	4.83
4375	4402	4.806
4376	4403	4.755
4377	4404	4.82
4378	4405	4.747
4379	4406	4.814
4380	4407	4.768
4381	4408	4.823
4382	4409	4.782
4383	4410	4.794
4384	4411	4.818
4385	4412	4.746
4386	4413	4.781
4387	4414	4.814
4388	4415	4.798
4389	4416	4.77
4390	4417	4.81
4391	4418	4.796
4392	4419	4.791
4393	4420	4.755
4394	4421	4.798
4395	4422	4.741
4396	4423	4.816
4397	4424	4.783
4398	4425	4.839
4399	4426	4.808
4400	4427	4.839
4401	4428	4.817
4402	4429	4.792
4403	4430	4.777
4404	4431	4.821
4405	4432	4.78
4406	4433	4.807
4407	4434	4.862
4408	4435	4.749
4409	4436	4.789
4410	4437	4.839
4411	4438	4.803
4412	4439	4.777
4413	4440	4.811
4414	4441	4.854
4415	4442	4.823
4416	4443	4.799
4417	4444	4.856
4418	4445	4.698

	Time (sec)	Drawdown (ft)
4419	4446	4.759
4420	4447	4.82
4421	4448	4.737
4422	4449	4.831
4423	4450	4.851
4424	4451	4.786
4425	4452	4.799
4426	4453	4.807
4427	4454	4.819
4428	4455	4.794
4429	4456	4.776
4430	4457	4.793
4431	4458	4.782
4432	4459	4.801
4433	4460	4.858
4434	4461	4.813
4435	4462	4.799
4436	4463	4.804
4437	4464	4.803
4438	4465	4.771
4439	4466	4.826
4440	4467	4.784
4441	4468	4.814
4442	4469	4.789
4443	4470	4.819
4444	4471	4.791
4445	4472	4.856
4446	4473	4.787
4447	4474	4.848
4448	4475	4.798
4449	4476	4.774
4450	4477	4.809
4451	4478	4.764
4452	4479	4.831
4453	4480	4.805
4454	4481	4.782
4455	4482	4.837
4456	4483	4.794
4457	4484	4.786
4458	4485	4.857
4459	4486	4.81
4460	4487	4.761
4461	4488	4.825
4462	4489	4.829
4463	4490	4.833
4464	4491	4.804
4465	4492	4.875

	Time (sec)	Drawdown (ft)
4466	4493	4.83
4467	4494	4.784
4468	4495	4.8
4469	4496	4.853
4470	4497	4.799
4471	4498	4.784
4472	4499	4.796
4473	4500	4.824
4474	4501	4.788
4475	4502	4.817
4476	4503	4.785
4477	4504	4.832
4478	4505	4.825
4479	4506	4.883
4480	4507	4.777
4481	4508	4.81
4482	4509	4.828
4483	4510	4.761
4484	4511	4.784
4485	4512	4.755
4486	4513	4.799
4487	4514	4.796
4488	4515	4.821
4489	4516	4.814
4490	4517	4.789
4491	4518	4.812
4492	4519	4.781
4493	4520	4.753
4494	4521	4.79
4495	4522	4.821
4496	4523	4.79
4497	4524	4.817
4498	4525	4.879
4499	4526	4.824
4500	4527	4.81
4501	4528	4.833
4502	4529	4.808
4503	4530	4.772
4504	4531	4.825
4505	4532	4.815
4506	4533	4.828
4507	4534	4.85
4508	4535	4.825
4509	4536	4.768
4510	4537	4.797
4511	4538	4.791
4512	4539	4.807

	Time (sec)	Drawdown (ft)
4513	4540	4.758
4514	4541	4.826
4515	4542	4.811
4516	4543	4.788
4517	4544	4.794
4518	4545	4.864
4519	4546	4.807
4520	4547	4.808
4521	4548	4.773
4522	4549	4.783
4523	4550	4.79
4524	4551	4.797
4525	4552	4.772
4526	4553	4.794
4527	4554	4.806
4528	4555	4.808
4529	4556	4.797
4530	4557	4.804
4531	4558	4.793
4532	4559	4.81
4533	4560	4.852
4534	4561	4.829
4535	4562	4.797
4536	4563	4.796
4537	4564	4.827
4538	4565	4.844
4539	4566	4.841
4540	4567	4.794
4541	4568	4.808
4542	4569	4.814
4543	4570	4.814
4544	4571	4.839
4545	4572	4.791
4546	4573	4.826
4547	4574	4.833
4548	4575	4.819
4549	4576	4.788
4550	4577	4.795
4551	4578	4.809
4552	4579	4.803
4553	4580	4.819
4554	4581	4.854
4555	4582	4.759
4556	4583	4.819
4557	4584	4.87
4558	4585	4.733
4559	4586	4.807

	Time (sec)	Drawdown (ft)
4560	4587	4.864
4561	4588	4.874
4562	4589	4.781
4563	4590	4.79
4564	4591	4.792
4565	4592	4.796
4566	4593	4.805
4567	4594	4.849
4568	4595	4.811
4569	4596	4.754
4570	4597	4.807
4571	4598	4.764
4572	4599	4.803
4573	4600	4.85
4574	4601	4.808
4575	4602	4.766
4576	4603	4.807
4577	4604	4.839
4578	4605	4.763
4579	4606	4.76
4580	4607	4.819
4581	4608	4.789
4582	4609	4.798
4583	4610	4.847
4584	4611	4.813
4585	4612	4.84
4586	4613	4.793
4587	4614	4.824
4588	4615	4.847
4589	4616	4.824
4590	4617	4.828
4591	4618	4.809
4592	4619	4.83
4593	4620	4.849
4594	4621	4.78
4595	4622	4.857
4596	4623	4.829
4597	4624	4.847
4598	4625	4.78
4599	4626	4.828
4600	4627	4.794
4601	4628	4.809
4602	4629	4.83
4603	4630	4.839
4604	4631	4.847
4605	4632	4.858
4606	4633	4.836

	Time (sec)	Drawdown (ft)
4607	4634	4.806
4608	4635	4.769
4609	4636	4.823
4610	4637	4.8
4611	4638	4.792
4612	4639	4.843
4613	4640	4.767
4614	4641	4.815
4615	4642	4.795
4616	4643	4.795
4617	4644	4.809
4618	4645	4.787
4619	4646	4.804
4620	4647	4.826
4621	4648	4.804
4622	4649	4.858
4623	4650	4.796
4624	4651	4.769
4625	4652	4.809
4626	4653	4.831
4627	4654	4.752
4628	4655	4.727
4629	4656	4.84
4630	4657	4.8
4631	4658	4.815
4632	4659	4.862
4633	4660	4.858
4634	4661	4.766
4635	4662	4.862
4636	4663	4.848
4637	4664	4.776
4638	4665	4.822
4639	4666	4.825
4640	4667	4.772
4641	4668	4.836
4642	4669	4.846
4643	4670	4.798
4644	4671	4.793
4645	4672	4.846
4646	4673	4.849
4647	4674	4.796
4648	4675	4.782
4649	4676	4.842
4650	4677	4.766
4651	4678	4.813
4652	4679	4.83
4653	4680	4.776

	Time (sec)	Drawdown (ft)
4654	4681	4.799
4655	4682	4.835
4656	4683	4.774
4657	4684	4.772
4658	4685	4.865
4659	4686	4.812
4660	4687	4.785
4661	4688	4.819
4662	4689	4.817
4663	4690	4.83
4664	4691	4.831
4665	4692	4.832
4666	4693	4.848
4667	4694	4.813
4668	4695	4.808
4669	4696	4.842
4670	4697	4.831
4671	4698	4.828
4672	4699	4.836
4673	4700	4.791
4674	4701	4.82
4675	4702	4.82
4676	4703	4.772
4677	4704	4.829
4678	4705	4.851
4679	4706	4.883
4680	4707	4.786
4681	4708	4.81
4682	4709	4.814
4683	4710	4.795
4684	4711	4.824
4685	4712	4.85
4686	4713	4.791
4687	4714	4.86
4688	4715	4.8
4689	4716	4.786
4690	4717	4.805
4691	4718	4.852
4692	4719	4.802
4693	4720	4.815
4694	4721	4.836
4695	4722	4.85
4696	4723	4.811
4697	4724	4.849
4698	4725	4.854
4699	4726	4.823
4700	4727	4.851

	Time (sec)	Drawdown (ft)
4701	4728	4.811
4702	4729	4.848
4703	4730	4.805
4704	4731	4.848
4705	4732	4.765
4706	4733	4.798
4707	4734	4.857
4708	4735	4.84
4709	4736	4.803
4710	4737	4.776
4711	4738	4.812
4712	4739	4.848
4713	4740	4.862
4714	4741	4.88
4715	4742	4.831
4716	4743	4.816
4717	4744	4.836
4718	4745	4.774
4719	4746	4.788
4720	4747	4.822
4721	4748	4.8
4722	4749	4.805
4723	4750	4.822
4724	4751	4.806
4725	4752	4.861
4726	4753	4.836
4727	4754	4.833
4728	4755	4.799
4729	4756	4.826
4730	4757	4.843
4731	4758	4.81
4732	4759	4.813
4733	4760	4.852
4734	4761	4.823
4735	4762	4.814
4736	4763	4.85
4737	4764	4.844
4738	4765	4.807
4739	4766	4.787
4740	4767	4.827
4741	4768	4.827
4742	4769	4.78
4743	4770	4.815
4744	4771	4.826
4745	4772	4.759
4746	4773	4.839
4747	4774	4.833

	Time (sec)	Drawdown (ft)
4748	4775	4.831
4749	4776	4.835
4750	4777	4.792
4751	4778	4.823
4752	4779	4.809
4753	4780	4.826
4754	4781	4.85
4755	4782	4.858
4756	4783	4.833
4757	4784	4.833
4758	4785	4.791
4759	4786	4.803
4760	4787	4.811
4761	4788	4.814
4762	4789	4.827
4763	4790	4.843
4764	4791	4.768
4765	4792	4.766
4766	4793	4.828
4767	4794	4.854
4768	4795	4.792
4769	4796	4.843
4770	4797	4.857
4771	4798	4.794
4772	4799	4.801
4773	4800	4.812
4774	4801	4.795
4775	4802	4.797
4776	4803	4.822
4777	4804	4.857
4778	4805	4.809
4779	4806	4.807
4780	4807	4.78
4781	4808	4.797
4782	4809	4.815
4783	4810	4.832
4784	4811	4.822
4785	4812	4.809
4786	4813	4.809
4787	4814	4.867
4788	4815	4.788
4789	4816	4.855
4790	4817	4.859
4791	4818	4.817
4792	4819	4.872
4793	4820	4.8
4794	4821	4.865

	Time (sec)	Drawdown (ft)
4795	4822	4.759
4796	4823	4.848
4797	4824	4.778
4798	4825	4.778
4799	4826	4.774
4800	4827	4.819
4801	4828	4.827
4802	4829	4.84
4803	4830	4.791
4804	4831	4.795
4805	4832	4.845
4806	4833	4.851
4807	4834	4.828
4808	4835	4.793
4809	4836	4.825
4810	4837	4.826
4811	4838	4.775
4812	4839	4.871
4813	4840	4.796
4814	4841	4.814
4815	4842	4.829
4816	4843	4.847
4817	4844	4.817
4818	4845	4.844
4819	4846	4.806
4820	4847	4.832
4821	4848	4.777
4822	4849	4.8
4823	4850	4.8
4824	4851	4.821
4825	4852	4.83
4826	4853	4.841
4827	4854	4.779
4828	4855	4.85
4829	4856	4.869
4830	4857	4.819
4831	4858	4.805
4832	4859	4.812
4833	4860	4.84
4834	4861	4.815
4835	4862	4.806
4836	4863	4.794
4837	4864	4.779
4838	4865	4.804
4839	4866	4.79
4840	4867	4.818
4841	4868	4.783

	Time (sec)	Drawdown (ft)
4842	4869	4.829
4843	4870	4.822
4844	4871	4.809
4845	4872	4.75
4846	4873	4.729
4847	4874	4.778
4848	4875	4.801
4849	4876	4.802
4850	4877	4.766
4851	4878	4.838
4852	4879	4.757
4853	4880	4.806
4854	4881	4.759
4855	4882	4.836
4856	4883	4.787
4857	4884	4.765
4858	4885	4.754
4859	4886	4.827
4860	4887	4.755
4861	4888	4.764
4862	4889	4.796
4863	4890	4.76
4864	4891	4.763
4865	4892	4.786
4866	4893	4.753
4867	4894	4.789
4868	4895	4.77
4869	4896	4.765
4870	4897	4.733
4871	4898	4.852
4872	4899	4.765
4873	4900	4.759
4874	4901	4.815
4875	4902	4.76
4876	4903	4.767
4877	4904	4.804
4878	4905	4.756
4879	4906	4.731
4880	4907	4.776
4881	4908	4.791
4882	4909	4.775
4883	4910	4.744
4884	4911	4.81
4885	4912	4.788
4886	4913	4.787
4887	4914	4.732
4888	4915	4.769

	Time (sec)	Drawdown (ft)
4889	4916	4.751
4890	4917	4.758
4891	4918	4.761
4892	4919	4.731
4893	4920	4.765
4894	4921	4.779
4895	4922	4.746
4896	4923	4.804
4897	4924	4.75
4898	4925	4.757
4899	4926	4.794
4900	4927	4.762
4901	4928	4.741
4902	4929	4.71
4903	4930	4.804
4904	4931	4.715
4905	4932	4.741
4906	4933	4.76
4907	4934	4.754
4908	4935	4.787
4909	4936	4.765
4910	4937	4.789
4911	4938	4.781
4912	4939	4.765
4913	4940	4.773
4914	4941	4.835
4915	4942	4.681
4916	4943	4.796
4917	4944	4.793
4918	4945	4.764
4919	4946	4.761
4920	4947	4.817
4921	4948	4.732
4922	4949	4.74
4923	4950	4.747
4924	4951	4.824
4925	4952	4.759
4926	4953	4.718
4927	4954	4.794
4928	4955	4.779
4929	4956	4.77
4930	4957	4.769
4931	4958	4.736
4932	4959	4.744
4933	4960	4.767
4934	4961	4.768
4935	4962	4.77

	Time (sec)	Drawdown (ft)
4936	4963	4.8
4937	4964	4.769
4938	4965	4.758
4939	4966	4.769
4940	4967	4.82
4941	4968	4.731
4942	4969	4.762
4943	4970	4.759
4944	4971	4.804
4945	4972	4.745
4946	4973	4.812
4947	4974	4.76
4948	4975	4.736
4949	4976	4.781
4950	4977	4.765
4951	4978	4.747
4952	4979	4.745
4953	4980	4.763
4954	4981	4.781
4955	4982	4.774
4956	4983	4.766
4957	4984	4.741
4958	4985	4.791
4959	4986	4.815
4960	4987	4.786
4961	4988	4.704
4962	4989	4.753
4963	4990	4.778
4964	4991	4.741
4965	4992	4.792
4966	4993	4.795
4967	4994	4.812
4968	4995	4.755
4969	4996	4.793
4970	4997	4.755
4971	4998	4.758
4972	4999	4.792
4973	5000	4.766
4974	5001	4.715
4975	5002	4.796
4976	5003	4.804
4977	5004	4.754
4978	5005	4.75
4979	5006	4.769
4980	5007	4.746
4981	5008	4.741
4982	5009	4.777

	Time (sec)	Drawdown (ft)
4983	5010	4.745
4984	5011	4.749
4985	5012	4.803
4986	5013	4.796
4987	5014	4.81
4988	5015	4.744
4989	5016	4.806
4990	5017	4.763
4991	5018	4.76
4992	5019	4.809
4993	5020	4.788
4994	5021	4.765
4995	5022	4.762
4996	5023	4.746
4997	5024	4.761
4998	5025	4.769
4999	5026	4.791
5000	5027	4.745
5001	5028	4.735
5002	5029	4.803
5003	5030	4.793
5004	5031	4.767
5005	5032	4.795
5006	5033	4.723
5007	5034	4.787
5008	5035	4.762
5009	5036	4.724
5010	5037	4.761
5011	5038	4.791
5012	5039	4.813
5013	5040	4.767
5014	5041	4.806
5015	5042	4.808
5016	5043	4.774
5017	5044	4.736
5018	5045	4.791
5019	5046	4.767
5020	5047	4.782
5021	5048	4.841
5022	5049	4.83
5023	5050	4.802
5024	5051	4.795
5025	5052	4.751
5026	5053	4.792
5027	5054	4.784
5028	5055	4.812
5029	5056	4.738

	Time (sec)	Drawdown (ft)
5030	5057	4.797
5031	5058	4.738
5032	5059	4.794
5033	5060	4.755
5034	5061	4.816
5035	5062	4.765
5036	5063	4.724
5037	5064	4.824
5038	5065	4.81
5039	5066	4.771
5040	5067	4.767
5041	5068	4.814
5042	5069	4.784
5043	5070	4.77
5044	5071	4.782
5045	5072	4.78
5046	5073	4.778
5047	5074	4.811
5048	5075	4.786
5049	5076	4.752
5050	5077	4.766
5051	5078	4.808
5052	5079	4.766
5053	5080	4.793
5054	5081	4.809
5055	5082	4.757
5056	5083	4.776
5057	5084	4.788
5058	5085	4.776
5059	5086	4.798
5060	5087	4.793
5061	5088	4.77
5062	5089	4.771
5063	5090	4.789
5064	5091	4.739
5065	5092	4.8
5066	5093	4.772
5067	5094	4.791
5068	5095	4.764
5069	5096	4.806
5070	5097	4.765
5071	5098	4.778
5072	5099	4.777
5073	5100	4.773
5074	5101	4.776
5075	5102	4.776
5076	5103	4.776

	Time (sec)	Drawdown (ft)
5077	5104	4.775
5078	5105	4.787
5079	5106	4.782
5080	5107	4.754
5081	5108	4.799
5082	5109	4.744
5083	5110	4.803
5084	5111	4.739
5085	5112	4.8
5086	5113	4.806
5087	5114	4.837
5088	5115	4.771
5089	5116	4.773
5090	5117	4.808
5091	5118	4.789
5092	5119	4.753
5093	5120	4.803
5094	5121	4.776
5095	5122	4.72
5096	5123	4.781
5097	5124	4.768
5098	5125	4.78
5099	5126	4.787
5100	5127	4.854
5101	5128	4.793
5102	5129	4.819
5103	5130	4.803
5104	5131	4.756
5105	5132	4.78
5106	5133	4.824
5107	5134	4.807
5108	5135	4.789
5109	5136	4.749
5110	5137	4.812
5111	5138	4.78
5112	5139	4.768
5113	5140	4.803
5114	5141	4.842
5115	5142	4.74
5116	5143	4.79
5117	5144	4.779
5118	5145	4.78
5119	5146	4.778
5120	5147	4.773
5121	5148	4.801
5122	5149	4.821
5123	5150	4.821

	Time (sec)	Drawdown (ft)
5124	5151	4.773
5125	5152	4.803
5126	5153	4.838
5127	5154	4.757
5128	5155	4.778
5129	5156	4.804
5130	5157	4.822
5131	5158	4.771
5132	5159	4.805
5133	5160	4.84
5134	5161	4.777
5135	5162	4.812
5136	5163	4.825
5137	5164	4.807
5138	5165	4.819
5139	5166	4.789
5140	5167	4.812
5141	5168	4.79
5142	5169	4.849
5143	5170	4.842
5144	5171	4.829
5145	5172	4.854
5146	5173	4.834
5147	5174	4.813
5148	5175	4.831
5149	5176	4.792
5150	5177	4.79
5151	5178	4.821
5152	5179	4.824
5153	5180	4.832
5154	5181	4.81
5155	5182	4.858
5156	5183	4.881
5157	5184	4.809
5158	5185	4.847
5159	5186	4.798
5160	5187	4.83
5161	5188	4.836
5162	5189	4.836
5163	5190	4.809
5164	5191	4.862
5165	5192	4.873
5166	5193	4.803
5167	5194	4.856
5168	5195	4.843
5169	5196	4.84
5170	5197	4.804

	Time (sec)	Drawdown (ft)
5171	5198	4.857
5172	5199	4.867
5173	5200	4.853
5174	5201	4.823
5175	5202	4.843
5176	5203	4.885
5177	5204	4.822
5178	5205	4.837
5179	5206	4.786
5180	5207	4.823
5181	5208	4.828
5182	5209	4.819
5183	5210	4.873
5184	5211	4.811
5185	5212	4.848
5186	5213	4.825
5187	5214	4.823
5188	5215	4.8
5189	5216	4.88
5190	5217	4.78
5191	5218	4.795
5192	5219	4.837
5193	5220	4.832
5194	5221	4.843
5195	5222	4.828
5196	5223	4.843
5197	5224	4.832
5198	5225	4.79
5199	5226	4.823
5200	5227	4.797
5201	5228	4.789
5202	5229	4.825
5203	5230	4.784
5204	5231	4.808
5205	5232	4.82
5206	5233	4.827
5207	5234	4.827
5208	5235	4.833
5209	5236	4.857
5210	5237	4.861
5211	5238	4.82
5212	5239	4.883
5213	5240	4.836
5214	5241	4.79
5215	5242	4.843
5216	5243	4.791
5217	5244	4.845

	Time (sec)	Drawdown (ft)
5218	5245	4.835
5219	5246	4.783
5220	5247	4.802
5221	5248	4.796
5222	5249	4.882
5223	5250	4.811
5224	5251	4.778
5225	5252	4.868
5226	5253	4.819
5227	5254	4.726
5228	5255	4.833
5229	5256	4.846
5230	5257	4.821
5231	5258	4.828
5232	5259	4.818
5233	5260	4.828
5234	5261	4.816
5235	5262	4.822
5236	5263	4.798
5237	5264	4.81
5238	5265	4.806
5239	5266	4.809
5240	5267	4.782
5241	5268	4.832
5242	5269	4.811
5243	5270	4.858
5244	5271	4.796
5245	5272	4.823
5246	5273	4.847
5247	5274	4.806
5248	5275	4.86
5249	5276	4.869
5250	5277	4.784
5251	5278	4.865
5252	5279	4.822
5253	5280	4.792
5254	5281	4.866
5255	5282	4.866
5256	5283	4.782
5257	5284	4.816
5258	5285	4.808
5259	5286	4.833
5260	5287	4.817
5261	5288	4.831
5262	5289	4.85
5263	5290	4.805
5264	5291	4.828

	Time (sec)	Drawdown (ft)
5265	5292	4.833
5266	5293	4.845
5267	5294	4.77
5268	5295	4.854
5269	5296	4.772
5270	5297	4.793
5271	5298	4.818
5272	5299	4.776
5273	5300	4.832
5274	5301	4.86
5275	5302	4.788
5276	5303	4.795
5277	5304	4.805
5278	5305	4.817
5279	5306	4.791
5280	5307	4.779
5281	5308	4.801
5282	5309	4.808
5283	5310	4.842
5284	5311	4.819
5285	5312	4.794
5286	5313	4.778
5287	5314	4.858
5288	5315	4.805
5289	5316	4.788
5290	5317	4.862
5291	5318	4.805
5292	5319	4.803
5293	5320	4.796
5294	5321	4.826
5295	5322	4.783
5296	5323	4.846
5297	5324	4.852
5298	5325	4.76
5299	5326	4.799
5300	5327	4.812
5301	5328	4.83
5302	5329	4.775
5303	5330	4.831
5304	5331	4.817
5305	5332	4.801
5306	5333	4.803
5307	5334	4.798
5308	5335	4.82
5309	5336	4.806
5310	5337	4.788
5311	5338	4.793

	Time (sec)	Drawdown (ft)
5312	5339	4.78
5313	5340	4.813
5314	5341	4.828
5315	5342	4.804
5316	5343	4.821
5317	5344	4.797
5318	5345	4.86
5319	5346	4.79
5320	5347	4.839
5321	5348	4.831
5322	5349	4.814
5323	5350	4.802
5324	5351	4.789
5325	5352	4.834
5326	5353	4.794
5327	5354	4.859
5328	5355	4.755
5329	5356	4.778
5330	5357	4.843
5331	5358	4.849
5332	5359	4.815
5333	5360	4.797
5334	5361	4.822
5335	5362	4.766
5336	5363	4.836
5337	5364	4.831
5338	5365	4.74
5339	5366	4.804
5340	5367	4.832
5341	5368	4.842
5342	5369	4.755
5343	5370	4.828
5344	5371	4.806
5345	5372	4.814
5346	5373	4.807
5347	5374	4.802
5348	5375	4.834
5349	5376	4.811
5350	5377	4.839
5351	5378	4.8
5352	5379	4.823
5353	5380	4.841
5354	5381	4.85
5355	5382	4.814
5356	5383	4.83
5357	5384	4.782
5358	5385	4.755

	Time (sec)	Drawdown (ft)
5359	5386	4.81
5360	5387	4.823
5361	5388	4.8
5362	5389	4.828
5363	5390	4.842
5364	5391	4.813
5365	5392	4.814
5366	5393	4.857
5367	5394	4.775
5368	5395	4.803
5369	5396	4.812
5370	5397	4.792
5371	5398	4.846
5372	5399	4.816
5373	5400	4.86
5374	5401	4.793
5375	5402	4.794
5376	5403	4.776
5377	5404	4.745
5378	5405	4.773
5379	5406	4.815
5380	5407	4.818
5381	5408	4.795
5382	5409	4.806
5383	5410	4.808
5384	5411	4.831
5385	5412	4.799
5386	5413	4.844
5387	5414	4.804
5388	5415	4.792
5389	5416	4.85
5390	5417	4.766
5391	5418	4.815
5392	5419	4.817
5393	5420	4.816
5394	5421	4.791
5395	5422	4.828
5396	5423	4.793
5397	5424	4.82
5398	5425	4.803
5399	5426	4.825
5400	5427	4.793
5401	5428	4.801
5402	5429	4.835
5403	5430	4.79
5404	5431	4.827
5405	5432	4.806

	Time (sec)	Drawdown (ft)
5406	5433	4.833
5407	5434	4.765
5408	5435	4.801
5409	5436	4.79
5410	5437	4.779
5411	5438	4.805
5412	5439	4.786
5413	5440	4.76
5414	5441	4.792
5415	5442	4.811
5416	5443	4.765
5417	5444	4.758
5418	5445	4.764
5419	5446	4.81
5420	5447	4.77
5421	5448	4.782
5422	5449	4.802
5423	5450	4.779
5424	5451	4.847
5425	5452	4.845
5426	5453	4.768
5427	5454	4.816
5428	5455	4.832
5429	5456	4.837
5430	5457	4.74
5431	5458	4.796
5432	5459	4.804
5433	5460	4.77
5434	5461	4.808
5435	5462	4.812
5436	5463	4.792
5437	5464	4.785
5438	5465	4.792
5439	5466	4.774
5440	5467	4.771
5441	5468	4.766
5442	5469	4.775
5443	5470	4.844
5444	5471	4.782
5445	5472	4.786
5446	5473	4.795
5447	5474	4.781
5448	5475	4.803
5449	5476	4.78
5450	5477	4.825
5451	5478	4.87
5452	5479	4.772

	Time (sec)	Drawdown (ft)
5453	5480	4.814
5454	5481	4.817
5455	5482	4.865
5456	5483	4.798
5457	5484	4.778
5458	5485	4.803
5459	5486	4.781
5460	5487	4.786
5461	5488	4.794
5462	5489	4.775
5463	5490	4.788
5464	5491	4.811
5465	5492	4.81
5466	5493	4.798
5467	5494	4.858
5468	5495	4.939
5469	5496	5.014
5470	5497	5.285
5471	5498	5.384
5472	5499	5.626
5473	5500	5.856
5474	5501	6.146
5475	5502	6.399
5476	5503	6.677
5477	5504	6.929
5478	5505	7.31
5479	5506	7.596
5480	5507	7.897
5481	5508	8.234
5482	5509	8.475
5483	5510	8.744
5484	5511	9.011
5485	5512	9.198
5486	5513	9.43
5487	5514	9.628
5488	5515	9.788
5489	5516	9.986
5490	5517	10.091
5491	5518	10.136
5492	5519	10.22
5493	5520	10.278
5494	5521	10.334
5495	5522	10.436
5496	5523	10.474
5497	5524	10.502
5498	5525	10.546
5499	5526	10.581

	Time (sec)	Drawdown (ft)
5500	5527	10.65
5501	5528	10.655
5502	5529	10.662
5503	5530	10.702
5504	5531	10.741
5505	5532	10.778
5506	5533	10.783
5507	5534	10.811
5508	5535	10.858
5509	5536	10.864
5510	5537	10.864
5511	5538	10.868
5512	5539	10.867
5513	5540	10.865
5514	5541	10.916
5515	5542	10.916
5516	5543	10.924
5517	5544	10.931
5518	5545	10.927
5519	5546	10.949
5520	5547	10.955
5521	5548	10.948
5522	5549	10.974
5523	5550	10.969
5524	5551	10.985
5525	5552	10.945
5526	5553	10.927
5527	5554	10.977
5528	5555	10.943
5529	5556	10.931
5530	5557	10.932
5531	5558	10.954
5532	5559	10.945
5533	5560	10.933
5534	5561	10.971
5535	5562	10.968
5536	5563	10.934
5537	5564	10.951
5538	5565	10.951
5539	5566	10.929
5540	5567	10.939
5541	5568	10.937
5542	5569	10.933
5543	5570	10.943
5544	5571	10.924
5545	5572	10.932
5546	5573	10.951

	Time (sec)	Drawdown (ft)
5547	5574	10.87
5548	5575	10.901
5549	5576	10.928
5550	5577	10.913
5551	5578	10.91
5552	5579	10.912
5553	5580	10.907
5554	5581	10.884
5555	5582	10.882
5556	5583	10.921
5557	5584	10.879
5558	5585	10.846
5559	5586	10.89
5560	5587	10.888
5561	5588	10.862
5562	5589	10.87
5563	5590	10.88
5564	5591	10.858
5565	5592	10.857
5566	5593	10.847
5567	5594	10.871
5568	5595	10.838
5569	5596	10.82
5570	5597	10.834
5571	5598	10.825
5572	5599	10.795
5573	5600	10.835
5574	5601	10.819
5575	5602	10.809
5576	5603	10.795
5577	5604	10.799
5578	5605	10.808
5579	5606	10.78
5580	5607	10.795
5581	5608	10.802
5582	5609	10.77
5583	5610	10.791
5584	5611	10.776
5585	5612	10.746
5586	5613	10.747
5587	5614	10.737
5588	5615	10.762
5589	5616	10.718
5590	5617	10.764
5591	5618	10.739
5592	5619	10.719
5593	5620	10.726

	Time (sec)	Drawdown (ft)
5594	5621	10.719
5595	5622	10.74
5596	5623	10.687
5597	5624	10.679
5598	5625	10.695
5599	5626	10.704
5600	5627	10.701
5601	5628	10.716
5602	5629	10.724
5603	5630	10.673
5604	5631	10.683
5605	5632	10.662
5606	5633	10.668
5607	5634	10.662
5608	5635	10.649
5609	5636	10.655
5610	5637	10.648
5611	5638	10.682
5612	5639	10.66
5613	5640	10.632
5614	5641	10.617
5615	5642	10.643
5616	5643	10.644
5617	5644	10.623
5618	5645	10.635
5619	5646	10.649
5620	5647	10.654
5621	5648	10.624
5622	5649	10.627
5623	5650	10.649
5624	5651	10.612
5625	5652	10.606
5626	5653	10.621
5627	5654	10.606
5628	5655	10.617
5629	5656	10.61
5630	5657	10.62
5631	5658	10.589
5632	5659	10.592
5633	5660	10.624
5634	5661	10.587
5635	5662	10.603
5636	5663	10.599
5637	5664	10.624
5638	5665	10.644
5639	5666	10.586
5640	5667	10.616

	Time (sec)	Drawdown (ft)
5641	5668	10.563
5642	5669	10.578
5643	5670	10.602
5644	5671	10.592
5645	5672	10.574
5646	5673	10.578
5647	5674	10.588
5648	5675	10.598
5649	5676	10.559
5650	5677	10.587
5651	5678	10.57
5652	5679	10.557
5653	5680	10.559
5654	5681	10.578
5655	5682	10.596
5656	5683	10.532
5657	5684	10.535
5658	5685	10.563
5659	5686	10.552
5660	5687	10.55
5661	5688	10.577
5662	5689	10.561
5663	5690	10.522
5664	5691	10.565
5665	5692	10.579
5666	5693	10.555
5667	5694	10.552
5668	5695	10.577
5669	5696	10.547
5670	5697	10.58
5671	5698	10.55
5672	5699	10.565
5673	5700	10.531
5674	5701	10.517
5675	5702	10.566
5676	5703	10.563
5677	5704	10.521
5678	5705	10.544
5679	5706	10.543
5680	5707	10.52
5681	5708	10.544
5682	5709	10.56
5683	5710	10.546
5684	5711	10.499
5685	5712	10.526
5686	5713	10.554
5687	5714	10.544

	Time (sec)	Drawdown (ft)
5688	5715	10.53
5689	5716	10.539
5690	5717	10.529
5691	5718	10.531
5692	5719	10.539
5693	5720	10.564
5694	5721	10.579
5695	5722	10.596
5696	5723	10.622
5697	5724	10.633
5698	5725	10.606
5699	5726	10.635
5700	5727	10.656
5701	5728	10.642
5702	5729	10.659
5703	5730	10.665
5704	5731	10.665
5705	5732	10.695
5706	5733	10.671
5707	5734	10.701
5708	5735	10.692
5709	5736	10.682
5710	5737	10.704
5711	5738	10.696
5712	5739	10.719
5713	5740	10.711
5714	5741	10.714
5715	5742	10.734
5716	5743	10.702
5717	5744	10.708
5718	5745	10.745
5719	5746	10.715
5720	5747	10.767
5721	5748	10.748
5722	5749	10.747
5723	5750	10.725
5724	5751	10.742
5725	5752	10.736
5726	5753	10.761
5727	5754	10.76
5728	5755	10.771
5729	5756	10.738
5730	5757	10.746
5731	5758	10.754
5732	5759	10.75
5733	5760	10.756
5734	5761	10.772

	Time (sec)	Drawdown (ft)
5735	5762	10.774
5736	5763	10.766
5737	5764	10.744
5738	5765	10.775
5739	5766	10.798
5740	5767	10.76
5741	5768	10.762
5742	5769	10.789
5743	5770	10.771
5744	5771	10.765
5745	5772	10.804
5746	5773	10.765
5747	5774	10.764
5748	5775	10.774
5749	5776	10.781
5750	5777	10.743
5751	5778	10.752
5752	5779	10.78
5753	5780	10.775
5754	5781	10.775
5755	5782	10.762
5756	5783	10.812
5757	5784	10.743
5758	5785	10.755
5759	5786	10.785
5760	5787	10.791
5761	5788	10.75
5762	5789	10.749
5763	5790	10.803
5764	5791	10.778
5765	5792	10.76
5766	5793	10.791
5767	5794	10.777
5768	5795	10.749
5769	5796	10.781
5770	5797	10.793
5771	5798	10.78
5772	5799	10.738
5773	5800	10.79
5774	5801	10.751
5775	5802	10.734
5776	5803	10.765
5777	5804	10.791
5778	5805	10.779
5779	5806	10.764
5780	5807	10.768
5781	5808	10.743

	Time (sec)	Drawdown (ft)
5782	5809	10.736
5783	5810	10.796
5784	5811	10.774
5785	5812	10.748
5786	5813	10.767
5787	5814	10.782
5788	5815	10.799
5789	5816	10.732
5790	5817	10.749
5791	5818	10.777
5792	5819	10.754
5793	5820	10.728
5794	5821	10.751
5795	5822	10.772
5796	5823	10.74
5797	5824	10.757
5798	5825	10.773
5799	5826	10.754
5800	5827	10.762
5801	5828	10.788
5802	5829	10.763
5803	5830	10.756
5804	5831	10.744
5805	5832	10.77
5806	5833	10.74
5807	5834	10.759
5808	5835	10.767
5809	5836	10.797
5810	5837	10.731
5811	5838	10.745
5812	5839	10.762
5813	5840	10.713
5814	5841	10.765
5815	5842	10.759
5816	5843	10.739
5817	5844	10.738
5818	5845	10.765
5819	5846	10.758
5820	5847	10.757
5821	5848	10.726
5822	5849	10.781
5823	5850	10.743
5824	5851	10.747
5825	5852	10.721
5826	5853	10.78
5827	5854	10.742
5828	5855	10.714

	Time (sec)	Drawdown (ft)
5829	5856	10.759
5830	5857	10.751
5831	5858	10.74
5832	5859	10.749
5833	5860	10.761
5834	5861	10.749
5835	5862	10.716
5836	5863	10.789
5837	5864	10.742
5838	5865	10.731
5839	5866	10.709
5840	5867	10.753
5841	5868	10.734
5842	5869	10.747
5843	5870	10.75
5844	5871	10.761
5845	5872	10.744
5846	5873	10.737
5847	5874	10.74
5848	5875	10.745
5849	5876	10.734
5850	5877	10.747
5851	5878	10.737
5852	5879	10.703
5853	5880	10.746
5854	5881	10.736
5855	5882	10.745
5856	5883	10.691
5857	5884	10.73
5858	5885	10.732
5859	5886	10.697
5860	5887	10.753
5861	5888	10.726
5862	5889	10.714
5863	5890	10.702
5864	5891	10.75
5865	5892	10.739
5866	5893	10.72
5867	5894	10.741
5868	5895	10.741
5869	5896	10.711
5870	5897	10.702
5871	5898	10.731
5872	5899	10.733
5873	5900	10.712
5874	5901	10.704
5875	5902	10.697

	Time (sec)	Drawdown (ft)
5876	5903	10.74
5877	5904	10.712
5878	5905	10.715
5879	5906	10.741
5880	5907	10.713
5881	5908	10.711
5882	5909	10.743
5883	5910	10.714
5884	5911	10.745
5885	5912	10.725
5886	5913	10.722
5887	5914	10.686
5888	5915	10.706
5889	5916	10.746
5890	5917	10.697
5891	5918	10.723
5892	5919	10.714
5893	5920	10.737
5894	5921	10.708
5895	5922	10.693
5896	5923	10.724
5897	5924	10.723
5898	5925	10.719
5899	5926	10.717
5900	5927	10.719
5901	5928	10.709
5902	5929	10.715
5903	5930	10.741
5904	5931	10.712
5905	5932	10.68
5906	5933	10.702
5907	5934	10.72
5908	5935	10.706
5909	5936	10.714
5910	5937	10.72
5911	5938	10.707
5912	5939	10.692
5913	5940	10.71
5914	5941	10.689
5915	5942	10.692
5916	5943	10.694
5917	5944	10.719
5918	5945	10.714
5919	5946	10.715
5920	5947	10.696
5921	5948	10.72
5922	5949	10.687

	Time (sec)	Drawdown (ft)
5923	5950	10.713
5924	5951	10.707
5925	5952	10.708
5926	5953	10.68
5927	5954	10.687
5928	5955	10.709
5929	5956	10.705
5930	5957	10.708
5931	5958	10.731
5932	5959	10.691
5933	5960	10.736
5934	5961	10.703
5935	5962	10.699
5936	5963	10.665
5937	5964	10.717
5938	5965	10.709
5939	5966	10.684
5940	5967	10.667
5941	5968	10.716
5942	5969	10.678
5943	5970	10.702
5944	5971	10.701
5945	5972	10.726
5946	5973	10.654
5947	5974	10.687
5948	5975	10.71
5949	5976	10.684
5950	5977	10.7
5951	5978	10.67
5952	5979	10.677
5953	5980	10.665
5954	5981	10.703
5955	5982	10.72
5956	5983	10.702
5957	5984	10.678
5958	5985	10.703
5959	5986	10.675
5960	5987	10.678
5961	5988	10.665
5962	5989	10.671
5963	5990	10.686
5964	5991	10.668
5965	5992	10.706
5966	5993	10.707
5967	5994	10.7
5968	5995	10.691
5969	5996	10.686

	Time (sec)	Drawdown (ft)
5970	5997	10.659
5971	5998	10.666
5972	5999	10.666
5973	6000	10.691
5974	6001	10.644
5975	6002	10.679
5976	6003	10.692
5977	6004	10.68
5978	6005	10.653
5979	6006	10.689
5980	6007	10.659
5981	6008	10.684
5982	6009	10.675
5983	6010	10.713
5984	6011	10.665
5985	6012	10.654
5986	6013	10.691
5987	6014	10.689
5988	6015	10.659
5989	6016	10.652
5990	6017	10.699
5991	6018	10.67
5992	6019	10.686
5993	6020	10.65
5994	6021	10.682
5995	6022	10.643
5996	6023	10.69
5997	6024	10.694
5998	6025	10.662
5999	6026	10.667
6000	6027	10.687
6001	6028	10.696
6002	6029	10.669
6003	6030	10.68
6004	6031	10.68
6005	6032	10.651
6006	6033	10.684
6007	6034	10.667
6008	6035	10.658
6009	6036	10.653
6010	6037	10.668
6011	6038	10.707
6012	6039	10.687
6013	6040	10.644
6014	6041	10.686
6015	6042	10.67
6016	6043	10.657

	Time (sec)	Drawdown (ft)
6017	6044	10.65
6018	6045	10.696
6019	6046	10.672
6020	6047	10.649
6021	6048	10.684
6022	6049	10.675
6023	6050	10.641
6024	6051	10.692
6025	6052	10.68
6026	6053	10.668
6027	6054	10.668
6028	6055	10.685
6029	6056	10.674
6030	6057	10.67
6031	6058	10.682
6032	6059	10.654
6033	6060	10.649
6034	6061	10.677
6035	6062	10.681
6036	6063	10.654
6037	6064	10.626
6038	6065	10.663
6039	6066	10.684
6040	6067	10.672
6041	6068	10.655
6042	6069	10.695
6043	6070	10.669
6044	6071	10.632
6045	6072	10.649
6046	6073	10.677
6047	6074	10.654
6048	6075	10.653
6049	6076	10.639
6050	6077	10.684
6051	6078	10.62
6052	6079	10.62
6053	6080	10.656
6054	6081	10.595
6055	6082	10.581
6056	6083	10.597
6057	6084	10.583
6058	6085	10.548
6059	6086	10.555
6060	6087	10.536
6061	6088	10.54
6062	6089	10.522
6063	6090	10.519

	Time (sec)	Drawdown (ft)
6064	6091	10.545
6065	6092	10.481
6066	6093	10.475
6067	6094	10.512
6068	6095	10.446
6069	6096	10.457
6070	6097	10.478
6071	6098	10.461
6072	6099	10.449
6073	6100	10.44
6074	6101	10.474
6075	6102	10.457
6076	6103	10.432
6077	6104	10.449
6078	6105	10.45
6079	6106	10.41
6080	6107	10.428
6081	6108	10.443
6082	6109	10.411
6083	6110	10.416
6084	6111	10.424
6085	6112	10.414
6086	6113	10.398
6087	6114	10.431
6088	6115	10.407
6089	6116	10.41
6090	6117	10.426
6091	6118	10.411
6092	6119	10.398
6093	6120	10.382
6094	6121	10.365
6095	6122	10.393
6096	6123	10.376
6097	6124	10.414
6098	6125	10.409
6099	6126	10.374
6100	6127	10.376
6101	6128	10.369
6102	6129	10.389
6103	6130	10.395
6104	6131	10.359
6105	6132	10.375
6106	6133	10.405
6107	6134	10.345
6108	6135	10.385
6109	6136	10.413
6110	6137	10.371

	Time (sec)	Drawdown (ft)
6111	6138	10.372
6112	6139	10.358
6113	6140	10.388
6114	6141	10.358
6115	6142	10.4
6116	6143	10.37
6117	6144	10.379
6118	6145	10.323
6119	6146	10.371
6120	6147	10.371
6121	6148	10.351
6122	6149	10.336
6123	6150	10.344
6124	6151	10.334
6125	6152	10.346
6126	6153	10.381
6127	6154	10.365
6128	6155	10.346
6129	6156	10.316
6130	6157	10.364
6131	6158	10.358
6132	6159	10.352
6133	6160	10.379
6134	6161	10.371
6135	6162	10.351
6136	6163	10.357
6137	6164	10.342
6138	6165	10.357
6139	6166	10.312
6140	6167	10.345
6141	6168	10.359
6142	6169	10.354
6143	6170	10.35
6144	6171	10.363
6145	6172	10.342
6146	6173	10.32
6147	6174	10.345
6148	6175	10.372
6149	6176	10.316
6150	6177	10.353
6151	6178	10.387
6152	6179	10.353
6153	6180	10.336
6154	6181	10.35
6155	6182	10.369
6156	6183	10.345
6157	6184	10.328

	Time (sec)	Drawdown (ft)
6158	6185	10.347
6159	6186	10.343
6160	6187	10.32
6161	6188	10.357
6162	6189	10.334
6163	6190	10.327
6164	6191	10.346
6165	6192	10.337
6166	6193	10.359
6167	6194	10.337
6168	6195	10.351
6169	6196	10.33
6170	6197	10.345
6171	6198	10.312
6172	6199	10.336
6173	6200	10.332
6174	6201	10.339
6175	6202	10.361
6176	6203	10.351
6177	6204	10.321
6178	6205	10.318
6179	6206	10.367
6180	6207	10.339
6181	6208	10.34
6182	6209	10.333
6183	6210	10.348
6184	6211	10.332
6185	6212	10.367
6186	6213	10.37
6187	6214	10.347
6188	6215	10.375
6189	6216	10.375
6190	6217	10.352
6191	6218	10.358
6192	6219	10.358
6193	6220	10.34
6194	6221	10.387
6195	6222	10.352
6196	6223	10.375
6197	6224	10.373
6198	6225	10.353
6199	6226	10.378
6200	6227	10.376
6201	6228	10.367
6202	6229	10.364
6203	6230	10.377
6204	6231	10.405

	Time (sec)	Drawdown (ft)
6205	6232	10.437
6206	6233	10.442
6207	6234	10.477
6208	6235	10.499
6209	6236	10.45
6210	6237	10.504
6211	6238	10.514
6212	6239	10.522
6213	6240	10.528
6214	6241	10.59
6215	6242	10.588
6216	6243	10.614
6217	6244	10.59
6218	6245	10.632
6219	6246	10.604
6220	6247	10.64
6221	6248	10.67
6222	6249	10.676
6223	6250	10.653
6224	6251	10.676
6225	6252	10.658
6226	6253	10.676
6227	6254	10.679
6228	6255	10.728
6229	6256	10.692
6230	6257	10.716
6231	6258	10.718
6232	6259	10.75
6233	6260	10.733
6234	6261	10.706
6235	6262	10.738
6236	6263	10.725
6237	6264	10.73
6238	6265	10.774
6239	6266	10.776
6240	6267	10.754
6241	6268	10.753
6242	6269	10.771
6243	6270	10.758
6244	6271	10.736
6245	6272	10.768
6246	6273	10.756
6247	6274	10.779
6248	6275	10.764
6249	6276	10.782
6250	6277	10.757
6251	6278	10.772

	Time (sec)	Drawdown (ft)
6252	6279	10.791
6253	6280	10.806
6254	6281	10.757
6255	6282	10.782
6256	6283	10.802
6257	6284	10.793
6258	6285	10.781
6259	6286	10.79
6260	6287	10.814
6261	6288	10.814
6262	6289	10.764
6263	6290	10.797
6264	6291	10.811
6265	6292	10.76
6266	6293	10.77
6267	6294	10.817
6268	6295	10.778
6269	6296	10.775
6270	6297	10.788
6271	6298	10.785
6272	6299	10.777
6273	6300	10.791
6274	6301	10.783
6275	6302	10.781
6276	6303	10.772
6277	6304	10.838
6278	6305	10.798
6279	6306	10.783
6280	6307	10.789
6281	6308	10.811
6282	6309	10.756
6283	6310	10.814
6284	6311	10.805
6285	6312	10.785
6286	6313	10.791
6287	6314	10.791
6288	6315	10.793
6289	6316	10.806
6290	6317	10.764
6291	6318	10.815
6292	6319	10.786
6293	6320	10.785
6294	6321	10.786
6295	6322	10.79
6296	6323	10.785
6297	6324	10.785
6298	6325	10.822

	Time (sec)	Drawdown (ft)
6299	6326	10.787
6300	6327	10.757
6301	6328	10.806
6302	6329	10.8
6303	6330	10.787
6304	6331	10.793
6305	6332	10.805
6306	6333	10.778
6307	6334	10.795
6308	6335	10.786
6309	6336	10.801
6310	6337	10.775
6311	6338	10.801
6312	6339	10.812
6313	6340	10.772
6314	6341	10.783
6315	6342	10.769
6316	6343	10.8
6317	6344	10.767
6318	6345	10.771
6319	6346	10.794
6320	6347	10.778
6321	6348	10.776
6322	6349	10.793
6323	6350	10.784
6324	6351	10.746
6325	6352	10.781
6326	6353	10.782
6327	6354	10.779
6328	6355	10.765
6329	6356	10.781
6330	6357	10.775
6331	6358	10.761
6332	6359	10.789
6333	6360	10.818
6334	6361	10.787
6335	6362	10.756
6336	6363	10.776
6337	6364	10.794
6338	6365	10.741
6339	6366	10.794
6340	6367	10.77
6341	6368	10.807
6342	6369	10.766
6343	6370	10.797
6344	6371	10.771
6345	6372	10.787

	Time (sec)	Drawdown (ft)
6346	6373	10.763
6347	6374	10.83
6348	6375	10.783
6349	6376	10.753
6350	6377	10.794
6351	6378	10.779
6352	6379	10.754
6353	6380	10.764
6354	6381	10.779
6355	6382	10.764
6356	6383	10.773
6357	6384	10.775
6358	6385	10.784
6359	6386	10.756
6360	6387	10.775
6361	6388	10.786
6362	6389	10.766
6363	6390	10.775
6364	6391	10.781
6365	6392	10.767
6366	6393	10.766
6367	6394	10.747
6368	6395	10.792
6369	6396	10.754
6370	6397	10.75
6371	6398	10.778
6372	6399	10.785
6373	6400	10.763
6374	6401	10.78
6375	6402	10.789
6376	6403	10.747
6377	6404	10.742
6378	6405	10.78
6379	6406	10.804
6380	6407	10.778
6381	6408	10.771
6382	6409	10.769
6383	6410	10.766
6384	6411	10.766
6385	6412	10.76
6386	6413	10.785
6387	6414	10.742
6388	6415	10.763
6389	6416	10.771
6390	6417	10.756
6391	6418	10.76
6392	6419	10.749

	Time (sec)	Drawdown (ft)
6393	6420	10.795
6394	6421	10.769
6395	6422	10.763
6396	6423	10.766
6397	6424	10.773
6398	6425	10.768
6399	6426	10.771
6400	6427	10.772
6401	6428	10.769
6402	6429	10.762
6403	6430	10.81
6404	6431	10.762
6405	6432	10.746
6406	6433	10.757
6407	6434	10.773
6408	6435	10.746
6409	6436	10.728
6410	6437	10.772
6411	6438	10.771
6412	6439	10.751
6413	6440	10.743
6414	6441	10.764
6415	6442	10.747
6416	6443	10.758
6417	6444	10.794
6418	6445	10.741
6419	6446	10.753
6420	6447	10.741
6421	6448	10.769
6422	6449	10.763
6423	6450	10.779
6424	6451	10.775
6425	6452	10.762
6426	6453	10.75
6427	6454	10.781
6428	6455	10.782
6429	6456	10.763
6430	6457	10.764
6431	6458	10.776
6432	6459	10.777
6433	6460	10.773
6434	6461	10.775
6435	6462	10.801
6436	6463	10.758
6437	6464	10.759
6438	6465	10.777
6439	6466	10.767

	Time (sec)	Drawdown (ft)
6440	6467	10.744
6441	6468	10.76
6442	6469	10.758
6443	6470	10.744
6444	6471	10.792
6445	6472	10.746
6446	6473	10.783
6447	6474	10.718
6448	6475	10.732
6449	6476	10.761
6450	6477	10.767
6451	6478	10.774
6452	6479	10.776
6453	6480	10.754
6454	6481	10.753
6455	6482	10.763
6456	6483	10.736
6457	6484	10.753
6458	6485	10.744
6459	6486	10.768
6460	6487	10.757
6461	6488	10.734
6462	6489	10.768
6463	6490	10.737
6464	6491	10.767
6465	6492	10.737
6466	6493	10.769
6467	6494	10.736
6468	6495	10.749
6469	6496	10.76
6470	6497	10.772
6471	6498	10.748
6472	6499	10.747
6473	6500	10.777
6474	6501	10.763
6475	6502	10.759
6476	6503	10.76
6477	6504	10.751
6478	6505	10.717
6479	6506	10.75
6480	6507	10.748
6481	6508	10.738
6482	6509	10.713
6483	6510	10.775
6484	6511	10.742
6485	6512	10.77
6486	6513	10.723

	Time (sec)	Drawdown (ft)
6487	6514	10.76
6488	6515	10.738
6489	6516	10.774
6490	6517	10.727
6491	6518	10.753
6492	6519	10.721
6493	6520	10.746
6494	6521	10.745
6495	6522	10.76
6496	6523	10.734
6497	6524	10.769
6498	6525	10.746
6499	6526	10.742
6500	6527	10.753
6501	6528	10.747
6502	6529	10.744
6503	6530	10.765
6504	6531	10.73
6505	6532	10.77
6506	6533	10.716
6507	6534	10.718
6508	6535	10.758
6509	6536	10.73
6510	6537	10.738
6511	6538	10.772
6512	6539	10.727
6513	6540	10.714
6514	6541	10.752
6515	6542	10.77
6516	6543	10.755
6517	6544	10.725
6518	6545	10.761
6519	6546	10.741
6520	6547	10.729
6521	6548	10.757
6522	6549	10.74
6523	6550	10.748
6524	6551	10.729
6525	6552	10.752
6526	6553	10.745
6527	6554	10.729
6528	6555	10.744
6529	6556	10.73
6530	6557	10.733
6531	6558	10.697
6532	6559	10.75
6533	6560	10.749

	Time (sec)	Drawdown (ft)
6534	6561	10.726
6535	6562	10.736
6536	6563	10.761
6537	6564	10.765
6538	6565	10.742
6539	6566	10.744
6540	6567	10.736
6541	6568	10.711
6542	6569	10.758
6543	6570	10.767
6544	6571	10.729
6545	6572	10.724
6546	6573	10.771
6547	6574	10.744
6548	6575	10.709
6549	6576	10.733
6550	6577	10.745
6551	6578	10.718
6552	6579	10.748
6553	6580	10.726
6554	6581	10.755
6555	6582	10.726
6556	6583	10.764
6557	6584	10.735
6558	6585	10.749
6559	6586	10.722
6560	6587	10.725
6561	6588	10.734
6562	6589	10.747
6563	6590	10.72
6564	6591	10.766
6565	6592	10.766
6566	6593	10.74
6567	6594	10.77
6568	6595	10.716
6569	6596	10.718
6570	6597	10.759
6571	6598	10.726
6572	6599	10.731
6573	6600	10.762
6574	6601	10.752
6575	6602	10.745
6576	6603	10.732
6577	6604	10.734
6578	6605	10.76
6579	6606	10.716
6580	6607	10.721

	Time (sec)	Drawdown (ft)
6581	6608	10.753
6582	6609	10.739
6583	6610	10.692
6584	6611	10.722
6585	6612	10.779
6586	6613	10.713
6587	6614	10.741
6588	6615	10.741
6589	6616	10.713
6590	6617	10.728
6591	6618	10.734
6592	6619	10.72
6593	6620	10.73
6594	6621	10.727
6595	6622	10.738
6596	6623	10.711
6597	6624	10.734
6598	6625	10.719
6599	6626	10.725
6600	6627	10.74
6601	6628	10.722
6602	6629	10.733
6603	6630	10.716
6604	6631	10.69
6605	6632	10.725
6606	6633	10.718
6607	6634	10.716
6608	6635	10.698
6609	6636	10.732
6610	6637	10.728
6611	6638	10.707
6612	6639	10.727
6613	6640	10.722
6614	6641	10.72
6615	6642	10.718
6616	6643	10.728
6617	6644	10.744
6618	6645	10.72
6619	6646	10.742
6620	6647	10.719
6621	6648	10.724
6622	6649	10.732
6623	6650	10.749
6624	6651	10.706
6625	6652	10.702
6626	6653	10.717
6627	6654	10.73

	Time (sec)	Drawdown (ft)
6628	6655	10.714
6629	6656	10.719
6630	6657	10.731
6631	6658	10.734
6632	6659	10.701
6633	6660	10.729
6634	6661	10.729
6635	6662	10.708
6636	6663	10.71
6637	6664	10.728
6638	6665	10.706
6639	6666	10.683
6640	6667	10.729
6641	6668	10.709
6642	6669	10.729
6643	6670	10.734
6644	6671	10.728
6645	6672	10.709
6646	6673	10.736
6647	6674	10.716
6648	6675	10.71
6649	6676	10.711
6650	6677	10.699
6651	6678	10.754
6652	6679	10.689
6653	6680	10.698
6654	6681	10.729
6655	6682	10.723
6656	6683	10.712
6657	6684	10.7
6658	6685	10.718
6659	6686	10.714
6660	6687	10.717
6661	6688	10.718
6662	6689	10.712
6663	6690	10.736
6664	6691	10.736
6665	6692	10.713
6666	6693	10.715
6667	6694	10.711
6668	6695	10.716
6669	6696	10.737
6670	6697	10.713
6671	6698	10.725
6672	6699	10.703
6673	6700	10.714
6674	6701	10.695

	Time (sec)	Drawdown (ft)
6675	6702	10.708
6676	6703	10.713
6677	6704	10.722
6678	6705	10.699
6679	6706	10.742
6680	6707	10.712
6681	6708	10.682
6682	6709	10.718
6683	6710	10.713
6684	6711	10.7
6685	6712	10.713
6686	6713	10.737
6687	6714	10.745
6688	6715	10.705
6689	6716	10.731
6690	6717	10.704
6691	6718	10.76
6692	6719	10.693
6693	6720	10.717
6694	6721	10.694
6695	6722	10.698
6696	6723	10.726
6697	6724	10.711
6698	6725	10.724
6699	6726	10.714
6700	6727	10.722
6701	6728	10.699
6702	6729	10.713
6703	6730	10.712
6704	6731	10.703
6705	6732	10.715
6706	6733	10.689
6707	6734	10.75
6708	6735	10.719
6709	6736	10.71
6710	6737	10.718
6711	6738	10.736
6712	6739	10.702
6713	6740	10.735
6714	6741	10.718
6715	6742	10.724
6716	6743	10.709
6717	6744	10.719
6718	6745	10.72
6719	6746	10.71
6720	6747	10.687
6721	6748	10.732

	Time (sec)	Drawdown (ft)
6722	6749	10.692
6723	6750	10.723
6724	6751	10.729
6725	6752	10.696
6726	6753	10.695
6727	6754	10.747
6728	6755	10.732
6729	6756	10.694
6730	6757	10.725
6731	6758	10.705
6732	6759	10.72
6733	6760	10.705
6734	6761	10.718
6735	6762	10.719
6736	6763	10.727
6737	6764	10.703
6738	6765	10.754
6739	6766	10.708
6740	6767	10.705
6741	6768	10.722
6742	6769	10.739
6743	6770	10.723
6744	6771	10.691
6745	6772	10.73
6746	6773	10.687
6747	6774	10.707
6748	6775	10.74
6749	6776	10.711
6750	6777	10.706
6751	6778	10.703
6752	6779	10.746
6753	6780	10.736
6754	6781	10.692
6755	6782	10.716
6756	6783	10.73
6757	6784	10.716
6758	6785	10.7
6759	6786	10.709
6760	6787	10.727
6761	6788	10.692
6762	6789	10.705
6763	6790	10.738
6764	6791	10.719
6765	6792	10.703
6766	6793	10.707
6767	6794	10.72
6768	6795	10.704

	Time (sec)	Drawdown (ft)
6769	6796	10.731
6770	6797	10.735
6771	6798	10.735
6772	6799	10.714
6773	6800	10.737
6774	6801	10.731
6775	6802	10.739
6776	6803	10.74
6777	6804	10.719
6778	6805	10.719
6779	6806	10.723
6780	6807	10.733
6781	6808	10.74
6782	6809	10.726
6783	6810	10.736
6784	6811	10.727
6785	6812	10.719
6786	6813	10.724
6787	6814	10.732
6788	6815	10.711
6789	6816	10.728
6790	6817	10.738
6791	6818	10.732
6792	6819	10.7
6793	6820	10.707
6794	6821	10.717
6795	6822	10.721
6796	6823	10.72
6797	6824	10.761
6798	6825	10.726
6799	6826	10.709
6800	6827	10.712
6801	6828	10.703
6802	6829	10.733
6803	6830	10.716
6804	6831	10.719
6805	6832	10.731
6806	6833	10.705
6807	6834	10.701
6808	6835	10.715
6809	6836	10.732
6810	6837	10.693
6811	6838	10.727
6812	6839	10.706
6813	6840	10.721
6814	6841	10.697
6815	6842	10.707

	Time (sec)	Drawdown (ft)
6816	6843	10.743
6817	6844	10.721
6818	6845	10.749
6819	6846	10.725
6820	6847	10.699
6821	6848	10.711
6822	6849	10.736
6823	6850	10.734
6824	6851	10.701
6825	6852	10.719
6826	6853	10.716
6827	6854	10.695
6828	6855	10.712
6829	6856	10.726
6830	6857	10.734
6831	6858	10.732
6832	6859	10.709
6833	6860	10.716
6834	6861	10.72
6835	6862	10.706
6836	6863	10.739
6837	6864	10.738
6838	6865	10.703
6839	6866	10.718
6840	6867	10.747
6841	6868	10.734
6842	6869	10.723
6843	6870	10.719
6844	6871	10.712
6845	6872	10.703
6846	6873	10.722
6847	6874	10.74
6848	6875	10.695
6849	6876	10.712
6850	6877	10.719
6851	6878	10.727
6852	6879	10.685
6853	6880	10.722
6854	6881	10.732
6855	6882	10.725
6856	6883	10.683
6857	6884	10.731
6858	6885	10.702
6859	6886	10.695
6860	6887	10.693
6861	6888	10.739
6862	6889	10.707

	Time (sec)	Drawdown (ft)
6863	6890	10.729
6864	6891	10.725
6865	6892	10.724
6866	6893	10.708
6867	6894	10.708
6868	6895	10.718
6869	6896	10.706
6870	6897	10.711
6871	6898	10.75
6872	6899	10.712
6873	6900	10.7
6874	6901	10.722
6875	6902	10.712
6876	6903	10.723
6877	6904	10.712
6878	6905	10.731
6879	6906	10.738
6880	6907	10.716
6881	6908	10.749
6882	6909	10.712
6883	6910	10.712
6884	6911	10.664
6885	6912	10.711
6886	6913	10.698
6887	6914	10.704
6888	6915	10.728
6889	6916	10.709
6890	6917	10.7
6891	6918	10.701
6892	6919	10.733
6893	6920	10.723
6894	6921	10.694
6895	6922	10.725
6896	6923	10.685
6897	6924	10.699
6898	6925	10.709
6899	6926	10.723
6900	6927	10.733
6901	6928	10.712
6902	6929	10.706
6903	6930	10.729
6904	6931	10.718
6905	6932	10.698
6906	6933	10.715
6907	6934	10.706
6908	6935	10.682
6909	6936	10.723

	Time (sec)	Drawdown (ft)
6910	6937	10.738
6911	6938	10.714
6912	6939	10.713
6913	6940	10.713
6914	6941	10.706
6915	6942	10.706
6916	6943	10.714
6917	6944	10.726
6918	6945	10.71
6919	6946	10.703
6920	6947	10.699
6921	6948	10.715
6922	6949	10.702
6923	6950	10.705
6924	6951	10.692
6925	6952	10.7
6926	6953	10.696
6927	6954	10.688
6928	6955	10.702
6929	6956	10.698
6930	6957	10.723
6931	6958	10.715
6932	6959	10.684
6933	6960	10.686
6934	6961	10.723
6935	6962	10.701
6936	6963	10.7
6937	6964	10.69
6938	6965	10.732
6939	6966	10.681
6940	6967	10.685
6941	6968	10.705
6942	6969	10.701
6943	6970	10.7
6944	6971	10.684
6945	6972	10.702
6946	6973	10.658
6947	6974	10.728
6948	6975	10.715
6949	6976	10.708
6950	6977	10.686
6951	6978	10.694
6952	6979	10.69
6953	6980	10.717
6954	6981	10.711
6955	6982	10.705
6956	6983	10.7

	Time (sec)	Drawdown (ft)
6957	6984	10.694
6958	6985	10.689
6959	6986	10.711
6960	6987	10.71
6961	6988	10.679
6962	6989	10.72
6963	6990	10.701
6964	6991	10.689
6965	6992	10.672
6966	6993	10.703
6967	6994	10.676
6968	6995	10.713
6969	6996	10.723
6970	6997	10.705
6971	6998	10.698
6972	6999	10.712
6973	7000	10.712
6974	7001	10.682
6975	7002	10.664
6976	7003	10.691
6977	7004	10.691
6978	7005	10.686
6979	7006	10.729
6980	7007	10.692
6981	7008	10.697
6982	7009	10.677
6983	7010	10.737
6984	7011	10.716
6985	7012	10.673
6986	7013	10.683
6987	7014	10.708
6988	7015	10.688
6989	7016	10.683
6990	7017	10.713
6991	7018	10.69
6992	7019	10.683
6993	7020	10.704
6994	7021	10.701
6995	7022	10.691
6996	7023	10.685
6997	7024	10.707
6998	7025	10.702
6999	7026	10.703
7000	7027	10.71
7001	7028	10.677
7002	7029	10.674
7003	7030	10.708

	Time (sec)	Drawdown (ft)
7004	7031	10.733
7005	7032	10.695
7006	7033	10.69
7007	7034	10.708
7008	7035	10.715
7009	7036	10.707
7010	7037	10.691
7011	7038	10.685
7012	7039	10.699
7013	7040	10.679
7014	7041	10.725
7015	7042	10.693
7016	7043	10.7
7017	7044	10.687
7018	7045	10.69
7019	7046	10.714
7020	7047	10.684
7021	7048	10.703
7022	7049	10.69
7023	7050	10.718
7024	7051	10.713
7025	7052	10.682
7026	7053	10.707
7027	7054	10.699
7028	7055	10.694
7029	7056	10.688
7030	7057	10.691
7031	7058	10.695
7032	7059	10.705
7033	7060	10.708
7034	7061	10.682
7035	7062	10.699
7036	7063	10.711
7037	7064	10.705
7038	7065	10.695
7039	7066	10.694
7040	7067	10.713
7041	7068	10.681
7042	7069	10.72
7043	7070	10.713
7044	7071	10.689
7045	7072	10.693
7046	7073	10.714
7047	7074	10.679
7048	7075	10.691
7049	7076	10.705
7050	7077	10.724

	Time (sec)	Drawdown (ft)
7051	7078	10.703
7052	7079	10.689
7053	7080	10.69
7054	7081	10.684
7055	7082	10.691
7056	7083	10.694
7057	7084	10.701
7058	7085	10.678
7059	7086	10.691
7060	7087	10.692
7061	7088	10.687
7062	7089	10.673
7063	7090	10.711
7064	7091	10.727
7065	7092	10.68
7066	7093	10.698
7067	7094	10.716
7068	7095	10.689
7069	7096	10.686
7070	7097	10.719
7071	7098	10.712
7072	7099	10.692
7073	7100	10.691
7074	7101	10.698
7075	7102	10.711
7076	7103	10.668
7077	7104	10.701
7078	7105	10.683
7079	7106	10.669
7080	7107	10.678
7081	7108	10.699
7082	7109	10.692
7083	7110	10.701
7084	7111	10.702
7085	7112	10.692
7086	7113	10.692
7087	7114	10.717
7088	7115	10.693
7089	7116	10.692
7090	7117	10.698
7091	7118	10.705
7092	7119	10.702
7093	7120	10.699
7094	7121	10.664
7095	7122	10.722
7096	7123	10.701
7097	7124	10.684

	Time (sec)	Drawdown (ft)
7098	7125	10.685
7099	7126	10.705
7100	7127	10.682
7101	7128	10.692
7102	7129	10.683
7103	7130	10.719
7104	7131	10.643
7105	7132	10.706
7106	7133	10.672
7107	7134	10.693
7108	7135	10.68
7109	7136	10.71
7110	7137	10.702
7111	7138	10.694
7112	7139	10.694
7113	7140	10.694
7114	7141	10.669
7115	7142	10.68
7116	7143	10.696
7117	7144	10.694
7118	7145	10.696
7119	7146	10.7
7120	7147	10.668
7121	7148	10.694
7122	7149	10.697
7123	7150	10.729
7124	7151	10.696
7125	7152	10.671
7126	7153	10.704
7127	7154	10.691
7128	7155	10.674
7129	7156	10.686
7130	7157	10.714
7131	7158	10.716
7132	7159	10.695
7133	7160	10.7
7134	7161	10.696
7135	7162	10.665
7136	7163	10.691
7137	7164	10.712
7138	7165	10.697
7139	7166	10.711
7140	7167	10.679
7141	7168	10.709
7142	7169	10.691
7143	7170	10.683
7144	7171	10.693

	Time (sec)	Drawdown (ft)
7145	7172	10.698
7146	7173	10.707
7147	7174	10.705
7148	7175	10.697
7149	7176	10.663
7150	7177	10.697
7151	7178	10.731
7152	7179	10.714
7153	7180	10.688
7154	7181	10.677
7155	7182	10.675
7156	7183	10.672
7157	7184	10.704
7158	7185	10.699
7159	7186	10.666
7160	7187	10.668
7161	7188	10.694
7162	7189	10.692
7163	7190	10.695
7164	7191	10.688
7165	7192	10.695
7166	7193	10.676
7167	7194	10.683
7168	7195	10.681
7169	7196	10.689
7170	7197	10.673
7171	7198	10.667
7172	7199	10.701
7173	7200	10.67
7174	7201	10.682
7175	7202	10.71
7176	7203	10.704
7177	7204	10.682
7178	7205	10.698
7179	7206	10.677
7180	7207	10.688
7181	7208	10.681
7182	7209	10.7
7183	7210	10.706
7184	7211	10.683
7185	7212	10.683
7186	7213	10.701
7187	7214	10.674
7188	7215	10.657
7189	7216	10.668
7190	7217	10.714
7191	7218	10.677

	Time (sec)	Drawdown (ft)
7192	7219	10.688
7193	7220	10.719
7194	7221	10.661
7195	7222	10.695
7196	7223	10.714
7197	7224	10.724
7198	7225	10.697
7199	7226	10.673
7200	7227	10.689
7201	7228	10.667
7202	7229	10.68
7203	7230	10.706
7204	7231	10.706
7205	7232	10.694
7206	7233	10.687
7207	7234	10.701
7208	7235	10.663
7209	7236	10.662
7210	7237	10.682
7211	7238	10.689
7212	7239	10.682
7213	7240	10.682
7214	7241	10.677
7215	7242	10.694
7216	7243	10.693
7217	7244	10.697
7218	7245	10.685
7219	7246	10.662
7220	7247	10.689
7221	7248	10.724
7222	7249	10.681
7223	7250	10.667
7224	7251	10.694
7225	7252	10.68
7226	7253	10.694
7227	7254	10.704
7228	7255	10.687
7229	7256	10.7
7230	7257	10.678
7231	7258	10.708
7232	7259	10.699
7233	7260	10.699
7234	7261	10.717
7235	7262	10.688
7236	7263	10.696
7237	7264	10.684
7238	7265	10.686

	Time (sec)	Drawdown (ft)
7239	7266	10.682
7240	7267	10.662
7241	7268	10.696
7242	7269	10.698
7243	7270	10.673
7244	7271	10.646
7245	7272	10.682
7246	7273	10.692
7247	7274	10.711
7248	7275	10.656
7249	7276	10.692
7250	7277	10.669
7251	7278	10.688
7252	7279	10.718
7253	7280	10.681
7254	7281	10.681
7255	7282	10.695
7256	7283	10.702
7257	7284	10.703
7258	7285	10.663
7259	7286	10.703
7260	7287	10.687
7261	7288	10.653
7262	7289	10.685
7263	7290	10.694
7264	7291	10.694
7265	7292	10.668
7266	7293	10.706
7267	7294	10.685
7268	7295	10.67
7269	7296	10.699
7270	7297	10.71
7271	7298	10.666
7272	7299	10.673
7273	7300	10.696
7274	7301	10.659
7275	7302	10.692
7276	7303	10.716
7277	7304	10.682
7278	7305	10.691
7279	7306	10.667
7280	7307	10.695
7281	7308	10.659
7282	7309	10.676
7283	7310	10.701
7284	7311	10.702
7285	7312	10.686

	Time (sec)	Drawdown (ft)
7286	7313	10.696
7287	7314	10.695
7288	7315	10.678
7289	7316	10.662
7290	7317	10.693
7291	7318	10.691
7292	7319	10.692
7293	7320	10.66
7294	7321	10.723
7295	7322	10.68
7296	7323	10.655
7297	7324	10.686
7298	7325	10.702
7299	7326	10.66
7300	7327	10.667
7301	7328	10.707
7302	7329	10.676
7303	7330	10.679
7304	7331	10.693
7305	7332	10.707
7306	7333	10.664
7307	7334	10.656
7308	7335	10.713
7309	7336	10.659
7310	7337	10.681
7311	7338	10.693
7312	7339	10.685
7313	7340	10.695
7314	7341	10.669
7315	7342	10.683
7316	7343	10.691
7317	7344	10.701
7318	7345	10.68
7319	7346	10.684
7320	7347	10.673
7321	7348	10.693
7322	7349	10.699
7323	7350	10.699
7324	7351	10.69
7325	7352	10.694
7326	7353	10.693
7327	7354	10.676
7328	7355	10.704
7329	7356	10.674
7330	7357	10.709
7331	7358	10.667
7332	7359	10.698

	Time (sec)	Drawdown (ft)
7333	7360	10.688
7334	7361	10.677
7335	7362	10.659
7336	7363	10.676
7337	7364	10.712
7338	7365	10.689
7339	7366	10.692
7340	7367	10.685
7341	7368	10.667
7342	7369	10.696
7343	7370	10.689
7344	7371	10.698
7345	7372	10.691
7346	7373	10.696
7347	7374	10.711
7348	7375	10.674
7349	7376	10.674
7350	7377	10.696
7351	7378	10.676
7352	7379	10.676
7353	7380	10.681
7354	7381	10.697
7355	7382	10.665
7356	7383	10.692
7357	7384	10.703
7358	7385	10.653
7359	7386	10.694
7360	7387	10.702
7361	7388	10.694
7362	7389	10.676
7363	7390	10.674
7364	7391	10.675
7365	7392	10.681
7366	7393	10.667
7367	7394	10.682
7368	7395	10.679
7369	7396	10.671
7370	7397	10.717
7371	7398	10.68
7372	7399	10.702
7373	7400	10.682
7374	7401	10.658
7375	7402	10.693
7376	7403	10.661
7377	7404	10.675
7378	7405	10.697
7379	7406	10.688

	Time (sec)	Drawdown (ft)
7380	7407	10.684
7381	7408	10.692
7382	7409	10.676
7383	7410	10.674
7384	7411	10.674
7385	7412	10.682
7386	7413	10.707
7387	7414	10.678
7388	7415	10.69
7389	7416	10.681
7390	7417	10.687
7391	7418	10.674
7392	7419	10.667
7393	7420	10.667
7394	7421	10.651
7395	7422	10.695
7396	7423	10.679
7397	7424	10.672
7398	7425	10.679
7399	7426	10.676
7400	7427	10.667
7401	7428	10.676
7402	7429	10.67
7403	7430	10.662
7404	7431	10.661
7405	7432	10.667
7406	7433	10.675
7407	7434	10.711
7408	7435	10.665
7409	7436	10.692
7410	7437	10.703
7411	7438	10.68
7412	7439	10.662
7413	7440	10.703
7414	7441	10.664
7415	7442	10.67
7416	7443	10.689
7417	7444	10.69
7418	7445	10.685
7419	7446	10.688
7420	7447	10.682
7421	7448	10.666
7422	7449	10.659
7423	7450	10.67
7424	7451	10.693
7425	7452	10.658
7426	7453	10.694

	Time (sec)	Drawdown (ft)
7427	7454	10.718
7428	7455	10.678
7429	7456	10.67
7430	7457	10.706
7431	7458	10.7
7432	7459	10.677
7433	7460	10.684
7434	7461	10.68
7435	7462	10.697
7436	7463	10.694
7437	7464	10.69
7438	7465	10.699
7439	7466	10.692
7440	7467	10.655
7441	7468	10.701
7442	7469	10.69
7443	7470	10.677
7444	7471	10.689
7445	7472	10.667
7446	7473	10.646
7447	7474	10.691
7448	7475	10.684
7449	7476	10.681
7450	7477	10.671
7451	7478	10.677
7452	7479	10.695
7453	7480	10.668
7454	7481	10.668
7455	7482	10.678
7456	7483	10.669
7457	7484	10.693
7458	7485	10.668
7459	7486	10.69
7460	7487	10.676
7461	7488	10.665
7462	7489	10.678
7463	7490	10.684
7464	7491	10.664
7465	7492	10.69
7466	7493	10.708
7467	7494	10.679
7468	7495	10.679
7469	7496	10.714
7470	7497	10.674
7471	7498	10.672
7472	7499	10.68
7473	7500	10.665

	Time (sec)	Drawdown (ft)
7474	7501	10.659
7475	7502	10.678
7476	7503	10.691
7477	7504	10.681
7478	7505	10.671
7479	7506	10.687
7480	7507	10.672
7481	7508	10.672
7482	7509	10.663
7483	7510	10.683
7484	7511	10.694
7485	7512	10.665
7486	7513	10.681
7487	7514	10.681
7488	7515	10.671
7489	7516	10.68
7490	7517	10.692
7491	7518	10.669
7492	7519	10.652
7493	7520	10.678
7494	7521	10.727
7495	7522	10.649
7496	7523	10.678
7497	7524	10.666
7498	7525	10.701
7499	7526	10.674
7500	7527	10.666
7501	7528	10.692
7502	7529	10.665
7503	7530	10.652
7504	7531	10.678
7505	7532	10.689
7506	7533	10.658
7507	7534	10.671
7508	7535	10.692
7509	7536	10.678
7510	7537	10.676
7511	7538	10.666
7512	7539	10.695
7513	7540	10.689
7514	7541	10.689
7515	7542	10.688
7516	7543	10.669
7517	7544	10.688
7518	7545	10.716
7519	7546	10.695
7520	7547	10.664

	Time (sec)	Drawdown (ft)
7521	7548	10.678
7522	7549	10.672
7523	7550	10.675
7524	7551	10.661
7525	7552	10.69
7526	7553	10.681
7527	7554	10.676
7528	7555	10.681
7529	7556	10.679
7530	7557	10.694
7531	7558	10.671
7532	7559	10.686
7533	7560	10.706
7534	7561	10.66
7535	7562	10.672
7536	7563	10.693
7537	7564	10.663
7538	7565	10.652
7539	7566	10.691
7540	7567	10.694
7541	7568	10.628
7542	7569	10.692
7543	7570	10.689
7544	7571	10.665
7545	7572	10.642
7546	7573	10.687
7547	7574	10.681
7548	7575	10.662
7549	7576	10.682
7550	7577	10.654
7551	7578	10.67
7552	7579	10.65
7553	7580	10.664
7554	7581	10.669
7555	7582	10.652
7556	7583	10.647
7557	7584	10.69
7558	7585	10.655
7559	7586	10.655
7560	7587	10.662
7561	7588	10.651
7562	7589	10.631
7563	7590	10.648
7564	7591	10.657
7565	7592	10.642
7566	7593	10.656
7567	7594	10.649

	Time (sec)	Drawdown (ft)
7568	7595	10.66
7569	7596	10.628
7570	7597	10.644
7571	7598	10.618
7572	7599	10.627
7573	7600	10.63
7574	7601	10.654
7575	7602	10.644
7576	7603	10.616
7577	7604	10.618
7578	7605	10.638
7579	7606	10.624
7580	7607	10.62
7581	7608	10.631
7582	7609	10.628
7583	7610	10.627
7584	7611	10.637
7585	7612	10.657
7586	7613	10.65
7587	7614	10.615
7588	7615	10.647
7589	7616	10.621
7590	7617	10.632
7591	7618	10.632
7592	7619	10.672
7593	7620	10.612
7594	7621	10.645
7595	7622	10.652
7596	7623	10.65
7597	7624	10.644
7598	7625	10.642
7599	7626	10.649
7600	7627	10.635
7601	7628	10.634
7602	7629	10.665
7603	7630	10.659
7604	7631	10.626
7605	7632	10.619
7606	7633	10.629
7607	7634	10.65
7608	7635	10.628
7609	7636	10.642
7610	7637	10.662
7611	7638	10.632
7612	7639	10.624
7613	7640	10.649
7614	7641	10.642

	Time (sec)	Drawdown (ft)
7615	7642	10.639
7616	7643	10.671
7617	7644	10.641
7618	7645	10.648
7619	7646	10.644
7620	7647	10.639
7621	7648	10.643
7622	7649	10.637
7623	7650	10.67
7624	7651	10.625
7625	7652	10.623
7626	7653	10.654
7627	7654	10.676
7628	7655	10.639
7629	7656	10.621
7630	7657	10.682
7631	7658	10.624
7632	7659	10.651
7633	7660	10.65
7634	7661	10.651
7635	7662	10.654
7636	7663	10.633
7637	7664	10.667
7638	7665	10.665
7639	7666	10.637
7640	7667	10.664
7641	7668	10.671
7642	7669	10.642
7643	7670	10.652
7644	7671	10.673
7645	7672	10.634
7646	7673	10.604
7647	7674	10.66
7648	7675	10.629
7649	7676	10.662
7650	7677	10.644
7651	7678	10.667
7652	7679	10.646
7653	7680	10.646
7654	7681	10.649
7655	7682	10.651
7656	7683	10.659
7657	7684	10.61
7658	7685	10.648
7659	7686	10.664
7660	7687	10.649
7661	7688	10.65

	Time (sec)	Drawdown (ft)
7662	7689	10.678
7663	7690	10.645
7664	7691	10.659
7665	7692	10.654
7666	7693	10.65
7667	7694	10.619
7668	7695	10.669
7669	7696	10.693
7670	7697	10.644
7671	7698	10.633
7672	7699	10.652
7673	7700	10.671
7674	7701	10.643
7675	7702	10.63
7676	7703	10.672
7677	7704	10.648
7678	7705	10.63
7679	7706	10.65
7680	7707	10.665
7681	7708	10.634
7682	7709	10.614
7683	7710	10.649
7684	7711	10.649
7685	7712	10.641
7686	7713	10.634
7687	7714	10.639
7688	7715	10.644
7689	7716	10.641
7690	7717	10.672
7691	7718	10.637
7692	7719	10.625
7693	7720	10.638
7694	7721	10.649
7695	7722	10.624
7696	7723	10.625
7697	7724	10.641
7698	7725	10.641
7699	7726	10.632
7700	7727	10.665
7701	7728	10.641
7702	7729	10.617
7703	7730	10.62
7704	7731	10.635
7705	7732	10.637
7706	7733	10.635
7707	7734	10.648
7708	7735	10.649

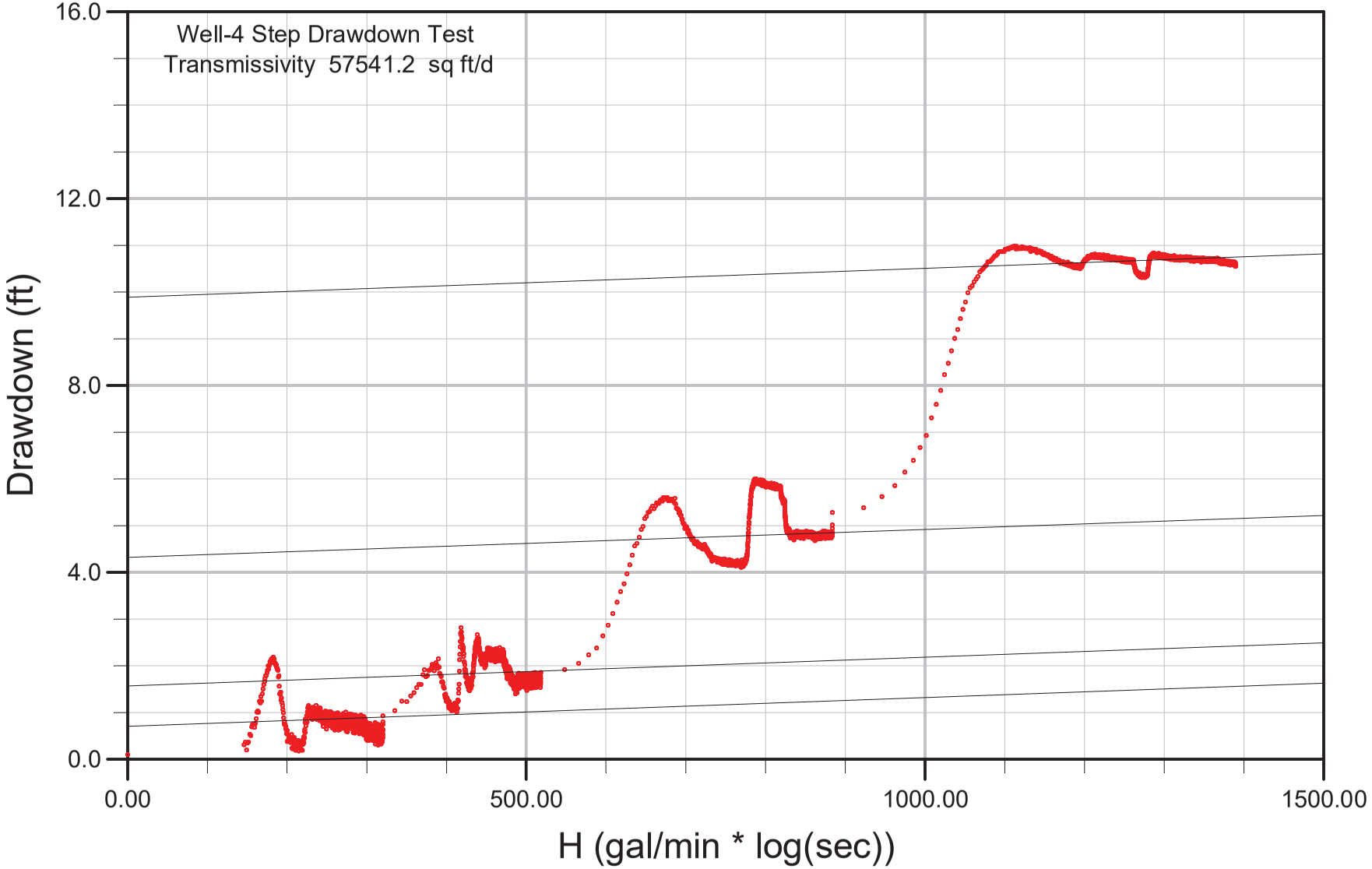
	Time (sec)	Drawdown (ft)
7709	7736	10.634
7710	7737	10.658
7711	7738	10.662
7712	7739	10.651
7713	7740	10.639
7714	7741	10.654
7715	7742	10.623
7716	7743	10.65
7717	7744	10.652
7718	7745	10.66
7719	7746	10.623
7720	7747	10.619
7721	7748	10.662
7722	7749	10.643
7723	7750	10.624
7724	7751	10.63
7725	7752	10.634
7726	7753	10.627
7727	7754	10.612
7728	7755	10.648
7729	7756	10.646
7730	7757	10.606
7731	7758	10.631
7732	7759	10.654
7733	7760	10.64
7734	7761	10.625
7735	7762	10.639
7736	7763	10.61
7737	7764	10.629
7738	7765	10.632
7739	7766	10.649
7740	7767	10.629
7741	7768	10.604
7742	7769	10.643
7743	7770	10.653
7744	7771	10.635
7745	7772	10.634
7746	7773	10.628
7747	7774	10.625
7748	7775	10.629
7749	7776	10.639
7750	7777	10.64
7751	7778	10.62
7752	7779	10.629
7753	7780	10.623
7754	7781	10.613
7755	7782	10.629

	Time (sec)	Drawdown (ft)
7756	7783	10.605
7757	7784	10.62
7758	7785	10.602
7759	7786	10.621
7760	7787	10.627
7761	7788	10.62
7762	7789	10.633
7763	7790	10.645
7764	7791	10.62
7765	7792	10.614
7766	7793	10.609
7767	7794	10.638
7768	7795	10.631
7769	7796	10.618
7770	7797	10.634
7771	7798	10.64
7772	7799	10.63
7773	7800	10.608
7774	7801	10.647
7775	7802	10.635
7776	7803	10.61
7777	7804	10.647
7778	7805	10.65
7779	7806	10.611
7780	7807	10.608
7781	7808	10.627
7782	7809	10.614
7783	7810	10.594
7784	7811	10.622
7785	7812	10.628
7786	7813	10.623
7787	7814	10.621
7788	7815	10.629
7789	7816	10.645
7790	7817	10.601
7791	7818	10.638
7792	7819	10.621
7793	7820	10.614
7794	7821	10.625
7795	7822	10.663
7796	7823	10.615
7797	7824	10.61
7798	7825	10.651
7799	7826	10.606
7800	7827	10.609
7801	7828	10.593
7802	7829	10.634

	Time (sec)	Drawdown (ft)
7803	7830	10.609
7804	7831	10.636
7805	7832	10.645
7806	7833	10.59
7807	7834	10.613
7808	7835	10.627
7809	7836	10.638
7810	7837	10.637
7811	7838	10.633
7812	7839	10.63
7813	7840	10.623
7814	7841	10.626
7815	7842	10.612
7816	7843	10.632
7817	7844	10.614
7818	7845	10.611
7819	7846	10.642
7820	7847	10.637
7821	7848	10.614
7822	7849	10.62
7823	7850	10.618
7824	7851	10.618
7825	7852	10.602
7826	7853	10.633
7827	7854	10.613
7828	7855	10.62
7829	7856	10.609
7830	7857	10.642
7831	7858	10.616
7832	7859	10.633
7833	7860	10.613
7834	7861	10.622
7835	7862	10.607
7836	7863	10.631
7837	7864	10.644
7838	7865	10.617
7839	7866	10.614
7840	7867	10.629
7841	7868	10.626
7842	7869	10.613
7843	7870	10.617
7844	7871	10.638
7845	7872	10.619
7846	7873	10.601
7847	7874	10.609
7848	7875	10.622
7849	7876	10.618

	Time (sec)	Drawdown (ft)
7850	7877	10.629
7851	7878	10.629
7852	7879	10.641
7853	7880	10.579
7854	7881	10.618
7855	7882	10.636
7856	7883	10.596
7857	7884	10.607
7858	7885	10.627
7859	7886	10.634
7860	7887	10.616
7861	7888	10.635
7862	7889	10.656
7863	7890	10.619
7864	7891	10.621
7865	7892	10.617
7866	7893	10.612
7867	7894	10.63
7868	7895	10.601
7869	7896	10.634
7870	7897	10.634
7871	7898	10.611
7872	7899	10.636
7873	7900	10.634
7874	7901	10.611
7875	7902	10.64
7876	7903	10.62
7877	7904	10.612
7878	7905	10.614
7879	7906	10.634
7880	7907	10.602
7881	7908	10.605
7882	7909	10.61
7883	7910	10.649
7884	7911	10.606
7885	7912	10.627
7886	7913	10.631
7887	7914	10.625
7888	7915	10.626
7889	7916	10.624
7890	7917	10.623
7891	7918	10.6
7892	7919	10.61
7893	7920	10.628
7894	7921	10.591
7895	7922	10.629
7896	7923	10.613

Eden and Hazel - Step 1



	Time (sec)	Drawdown (ft)
7897	7924	10.635
7898	7925	10.586
7899	7926	10.606
7900	7927	10.614
7901	7928	10.644
7902	7929	10.625
7903	7930	10.629
7904	7931	10.622
7905	7932	10.628
7906	7933	10.614
7907	7934	10.618
7908	7935	10.631
7909	7936	10.61
7910	7937	10.609
7911	7938	10.625
7912	7939	10.596
7913	7940	10.616
7914	7941	10.631
7915	7942	10.619
7916	7943	10.62
7917	7944	10.638
7918	7945	10.625
7919	7946	10.605
7920	7947	10.617
7921	7948	10.622
7922	7949	10.605
7923	7950	10.61
7924	7951	10.624
7925	7952	10.625
7926	7953	10.61
7927	7954	10.615
7928	7955	10.651
7929	7956	10.626
7930	7957	10.609
7931	7958	10.652
7932	7959	10.621
7933	7960	10.613
7934	7961	10.625
7935	7962	10.63
7936	7963	10.631
7937	7964	10.604
7938	7965	10.617
7939	7966	10.603
7940	7967	10.623
7941	7968	10.614
7942	7969	10.617
7943	7970	10.628

	Time (sec)	Drawdown (ft)
7944	7971	10.625
7945	7972	10.645
7946	7973	10.616
7947	7974	10.609
7948	7975	10.629
7949	7976	10.628
7950	7977	10.606
7951	7978	10.606
7952	7979	10.617
7953	7980	10.65
7954	7981	10.598
7955	7982	10.632
7956	7983	10.64
7957	7984	10.617
7958	7985	10.626
7959	7986	10.629
7960	7987	10.627
7961	7988	10.617
7962	7989	10.609
7963	7990	10.618
7964	7991	10.633
7965	7992	10.595
7966	7993	10.631
7967	7994	10.627
7968	7995	10.626
7969	7996	10.614
7970	7997	10.636
7971	7998	10.612
7972	7999	10.603
7973	8000	10.632
7974	8001	10.632
7975	8002	10.596
7976	8003	10.589
7977	8004	10.641
7978	8005	10.61
7979	8006	10.606
7980	8007	10.613
7981	8008	10.628
7982	8009	10.6
7983	8010	10.609
7984	8011	10.63
7985	8012	10.592
7986	8013	10.607
7987	8014	10.602
7988	8015	10.632
7989	8016	10.622
7990	8017	10.622

	Time (sec)	Drawdown (ft)
7991	8018	10.619
7992	8019	10.619
7993	8020	10.585
7994	8021	10.612
7995	8022	10.631
7996	8023	10.612
7997	8024	10.595
7998	8025	10.643
7999	8026	10.583
8000	8027	10.596
8001	8028	10.622
8002	8029	10.614
8003	8030	10.593
8004	8031	10.629
8005	8032	10.592
8006	8033	10.551
8007	8034	10.572
8008	8035	10.586
8009	8036	10.605
8010	8037	10.571
8011	8038	10.599
8012	8039	10.602
8013	8040	10.6
8014	8041	10.555
8015	8042	10.604
8016	8043	10.577
8017	8044	10.557
8018	8045	10.567
8019	8046	10.578
8020	8047	10.585