



County of Santa Cruz
Cannabis Licensing Office
701 Ocean Street, Room 520
Santa Cruz, CA 95060
831-454-3833
Cannabisinfo@santacruzcounty.us



CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

The Santa Cruz County Cannabis Licensing Office has reviewed the project described below and has determined that it is exempt from the provisions of CEQA as specified in Sections 15061 - 15332 of CEQA for the reason(s) which have been specified in this document.

Application Number: License NR-C-0080
Assessor Parcel Number: 049-091-31
Project Location: 2897 Freedom Blvd., Watsonville CA

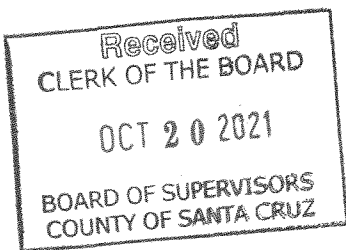
Project Description: Cannabis cultivation in greenhouses (see attached "Project Description Preparation Form_2897 Freedom Blvd.")

Person or Agency Proposing Project: George Workman

Contact Phone Number: 760-576-7070

- A. The proposed activity is not a project under CEQA Guidelines Section 15378.
- B. The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).
- C. **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.
- D. **Statutory Exemption** other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).
- E. **Categorical Exemption**

Specify type: Class 1: Use of existing facilities



THIS NOTICE HAS BEEN POSTED AT THE CLERK
OF THE BOARD OF SUPERVISORS OFFICE FOR A
PERIOD COMMENCING 10/20/2021
AND ENDING 11/19/2021



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Class	Category	Description
Class 1	Existing Facilities	Consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. (Cal. Code Regs., tit. 14, §15301.)

F. Reasons why the project is exempt:

Cultivation on an existing commercially-farmed property.

In addition, none of the conditions described in Section 15300.2 apply to this project.

DocuSigned by:

10/19/2021

Date:

Sam LoForti, Cannabis Licensing Manager

ATTACHMENTS: "Project Description Preparation Form_Refined Genetics LLC" (includes project location, vicinity, and site diagram maps and 'Best Management Operation Plan BMOP')



Project Description Preparation Form

Lead Agency: County of Santa Cruz Cannabis Licensing Office

Applicant Entity/Business Name: George Workman/Refined Genetics LLC

License Type(s): Class CA Greenhouse Cultivation

Date:

1. Source(s) of Information:

Identify Sources: SC County License Application Submission

2. Project Location:

Describe Project Location: 2897 Freedom Blvd., Watsonville CA. (Lat: 36 58 40.0835; Long: -122 121.2146)

Maps Included: 2897 Freedom Vicinity Map & Site Plan

3. Description of Project Site:

General Topographic Features (slopes and other features): 43-acre agricultural property with flat/valley floor area of 23 acres and forested bluffs rising to the south-west.

Natural Features (general vegetation types, presence of streams and wetlands, forested areas): About half of the property consists of greenhouses and agricultural fields. Two half-acre seasonal ponds lie at the foot of the forested sloped portion of the property, which includes oak woodland interspersed with grassland.

Existing Land Uses/Zoning: Commercial agriculture (CA) zoning for orchards, row crops, and berries. Cannabis cultivation is a principally-permitted use under the CA zoning regulations.

Existing Constructed Features (buildings, facilities, and other improvements): 3 greenhouses totaling 464,000 sf. in area, a residence, and 3 agricultural buildings.

Surrounding Land Uses (including sensitive uses): Commercial agriculture and large-lot residential

4. Required Site Improvements and Construction Activities:

Site Improvements: No site improvements are proposed. The project consists of cannabis cultivation (nursery) within 2 existing greenhouses and post-harvest self-distribution of immature plants (see "Sheet A 13"). Existing agricultural structures will be used for employee support facilities, water storage, and pesticide/herbicide storage.

Construction Activities: None.

5. Operation and Maintenance Activities:

Hours of Operation/Work Shifts: 7:00am to 7:00pm

Number of employees (total and by shift): 12 full-time employees.

Estimated Daily Trip Generation: 20 round-trips per day on average.

Source(s) of Water: Agricultural water well on the property, (1) 30,000 gallon storage tank.

Wastewater Treatment Facilities: Septic systems serve the residence and 10 bathrooms used by employees of the existing greenhouse operation.

Source(s) of Power: PG&E service

- 6. Environmental Commitments:** “Best Management and Operational Practices” (BMOP) requirements apply to all non-retail commercial cannabis businesses to reduce the environmental impacts of cannabis operations (Santa Cruz County Code Ch. 7.128.090.(A)(1)(a)(xi). A BMOP plan for this project was reviewed by the Cannabis Licensing Office and is kept on file with the license application. BMOP requirements for this project are noted below:

BMOP “Site Design” (Section B) measures to avoid and minimize impact to land and biotic resources include: Fencing and Security (B.1.), and Water Storage (B.5.)

BMOP Section D. “Operational Requirements” adopted by Refined Genetics LLC and approved by the Cannabis Licensing Office include: Transportation Demand Measures (TDM) (Section D.1.) Herbivory Prevention Plan (D.2.), Storage of Pesticides, Fuel, and Hazardous Materials (D.5.), Water Supply and Quality (D.7.), Waste (D.8.), Alternative Energy Sources (D.9.), Energy Conservation (D.10.).

Exceptions to categorical exemptions cited for the proposed non-retail cannabis project include: Class 1 “Existing Facilities”. The County of Santa Cruz Cannabis Licensing Office has determined that the proposed project 1) is not visible from scenic highways and/or impactful to scenic resources, 2) is not located on a “Cortese List” site, 3) does not substantially change a historic resource, 4) is likely to not contribute to a significant cumulative environmental impact, 5) is not subject (by location and/or design) to unusual circumstances that would reasonably contribute to a significant environmental impact.

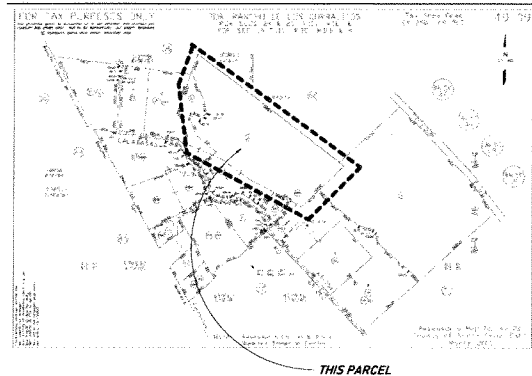
- 7. Environmental Permits Required (List all required federal, state, and local permits required):**

Agency	Permit	Status
California Department of Food and Agriculture, CalCannabis	Annual Cultivation License	Nursery cultivation license pending
California Department of Fish and Wildlife	Section 1602 Lake or Streambed Alteration Agreement	EPIMS no. 23149
State Water Resources Control Board / Regional Water Quality Control Board	Water quality protection program	Self-certification Application # 436895

Agency	Permit	Status
_____	_____	_____
_____	_____	_____
_____	_____	_____

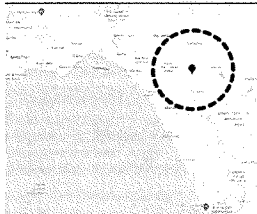
2897 Freedom
A 01

ASSESSOR'S MAP



THIS PARCEL

PROJECT VICINITY



APPLICABLE CODES

- SANTA CRUZ COUNTY CODES
 - 4 Certification of No Insect Infestation of Santa Cruz County, California
- 200 CALIFORNIA BUILDING CODE
 - 6 AS ADOPTED BY THE COUNTY OF SANTA CRUZ 10 16 2006
 - 10.10.21 SECC Appendix J of the 2004 California Building Code as amended
- 200 CALIFORNIA ELECTRICAL CODE
 - 6 AS ADOPTED BY THE COUNTY OF SANTA CRUZ
- 200 CALIFORNIA MECHANICAL CODE
 - 6 AS ADOPTED BY THE COUNTY OF SANTA CRUZ
- 200 CALIFORNIA FIRE CODE
 - 6 AS ADOPTED BY THE COUNTY OF SANTA CRUZ
- 200 CALIFORNIA ENERGY CODE
 - 6 AS ADOPTED BY THE COUNTY OF SANTA CRUZ
- 200 CALIFORNIA GREEN BUILDING STANDARDS CODE
 - 6 AS ADOPTED BY THE COUNTY OF SANTA CRUZ

PROJECT STATEMENT

PROGRAM STATEMENT
REFINED, LLC

REFINED, LLC PLANS TO CULTIVATE ORNAMENTAL CANNABIS PLANTS AT 2897 FREEDOM, IN SANTA CRUZ COUNTY, CALIFORNIA. THE PROPOSED SITE IS A 2.5 ACRES AND IS ZONED CA WITH A GENERAL PLAN DESIGNATION OF COMMERCIAL. ALL CULTIVATION OPERATIONS WILL OCCUR WITHIN THE SECTION OF BROWNHOUSES LABELED SECTION 1 AND 2 ON SHEET A10 ON OUR PREVIOUS SITE PLAN. THE TOTAL PROPOSED SQUARE FOOTAGE OF BROWNHOUSE CULTIVATION SPACE IS 20,000 SQ FT.

CANNABIS WASTE FROM CULTIVATION OPERATIONS WILL BE DISPOSED OF OFFSITE AT A WASTE TREATMENT FACILITY. ALL WASTE MANAGEMENT AND DISPOSAL OF ALL WASTE MATERIALS WILL BE DOCUMENTED IN THE WASTE MANAGEMENT PLAN. ALL CANNABIS WASTE ACCUMULATION MATERIAL WILL BE DOCUMENTED IN THE WASTE MANAGEMENT PLAN.

PARKING AND PEOPLE SEPARATION CO-LOCATION

CULTIVATION OPERATIONS ARE ANTICIPATED TO NEED A MINIMUM OF 10 PEOPLE. THIS STAFF MAY WORK AT THE SAME TIME OR IN STAGGERED SHIFTS IN ORDER TO COMPLY WITH PARKING LIMITS AT THE SITE. SITE PARKING WILL BE LIMITED TO 10 TO 15 SPACES, AS DETAILED ON SHEET A10. AND EXCESS VEHICLES ARE NOT PROPOSED AND WILL NOT BE TOLERATED. LEASE AGREEMENTS WITH FUTURE TENANTS WILL INCLUDE DETAILS AND PARKING RESTRICTIONS.

DAILY VEHICLE TRIPS TO THE SITE ARE ANTICIPATED TO INCLUDE UP TO 10 TRIP ASSUMES A WREST-LEASE INCLUDING OF EACH EMPLOYEE DRIVING THEIR OWN VEHICLE. THIS NUMBER IS CONSERVATIVE AS OPERATIONS MAY SHARE EMPLOYEES AND THE NUMBERS PROPOSED HERE ARE ASSUMING THE SITE IS OPERATING AT ITS MAXIMUM CAPACITY. ALL OPERATIONS MAY OCCUR UP TO 10:00 AM FOR WEEKDAYS FROM 7 AM TO 7 PM.

CANNABIS WASTE CO-LOCATION

CANNABIS WASTE CO-LOCATED IN ALL AREAS OF THE SITE. WASTE IN SHEET AREA CANNABIS WILL BE CULTIVATED ABOVE GRADE IN A VARIETY OF POT AND TRAY SETS BASED ON THE HORTICULTURAL TENANTS INTERESTS. ALL CANNABIS WILL BE CULTIVATED IN THE EXISTING SOIL AND PATH INFRASTRUCTURE. CANNABIS WILL BE GROWN FOR MEDICAL PLANTS AND SEEDS ONLY. THIS SCALE TO GROW AND PRODUCE CANNABIS FROM PLANTS. PLANTS WILL PRODUCE ORNAMENTAL MARIJUANA STARTER PLANTS THAT ARE SOLD TO LICENSED CULTIVATORS THROUGHOUT THE STATE. THE CULTIVATION METHODS WILL INCLUDE SPECIAL EMPLOYEE REQUIREMENTS AND THEREFORE ALL TENANTS WILL BE REQUIRED TO COMPLY WITH SITE PARKING REQUIREMENTS. CULTIVATION PROPOSED WITHIN BROWNHOUSES SHALL NOT INCLUDE LANDSCAPE, EXCEPT IF INCLUDED IN EXISTING STRUCTURES.

REFINED GENETICS

2897 Freedom Boulevard, Watsonville, CA 95076
APN: 049-091-31

NOTE: SITUS ADDRESS IS 120 JOHNSEN LANE

PROJECT DATA

PROJECT DESCRIPTION
CANNABIS LICENSING OFFICE LICENSE APPLICATION
CO-LOCATION IN EXISTING COMMERCIAL BROWNHOUSES
CLASS M NURSERY

SHEET INDEX

#	TITLE	ISSUE DATE	CHECKED	REVISION
A 01	COVER SHEET	10 Sept 2021		
A 02	PROPERTY INFORMATION	10 Sept 2021		
A 03	MAP	10 Sept 2021		
A 04	SITE PLAN OF EXISTING PARCEL - EXISTING	10 Sept 2021		
A 05	SITE PLAN OF EXISTING PARCEL - PROPOSED	10 Sept 2021		
A 06	ENLARGED SITE PLAN - EXISTING	10 Sept 2021		
A 07	ENLARGED SITE PLAN - PROPOSED	10 Sept 2021		

CONTACTS

PROPERTY OWNER
LARRY JACOBS
2897 FREEDOM BLVD
WATSONVILLE, CA 95076
LARRY@REFINED.COM
408.224.0808

ARCHITECT
WHITFIELD ARCHITECTS
/ DAVID WHITFIELD
300A FIVE CORNER BY SUTCA HALL
DANIEL@WHITFIELDARCHITECTS.COM
415.784.6777

PROJECT LEAD
BENJAMIN WOODMAN
REFINED GENETICS
714 FERNBUSH RD
CARLSBAD, CA 92008
BENJAMIN.WOODMAN@REFINED.COM
761.911.3170



NOT FOR CONSTRUCTION
DO NOT DISTRIBUTE

REFINED GENETICS

2897 Freedom Boulevard, Watsonville, CA 95076
APN: 049-091-31

ISSUED
10 Sept 2021

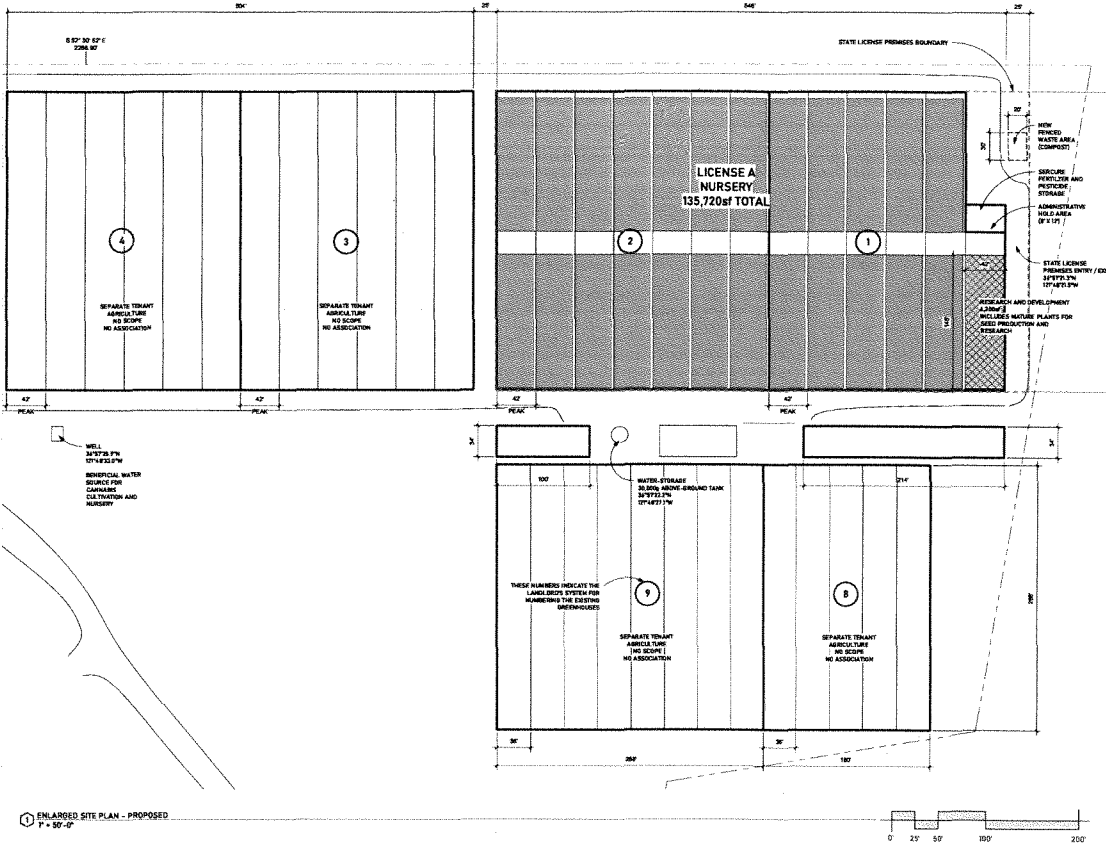
COVER SHEET

A 01

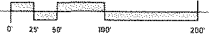
SECURITY PLAN INFORMATION SUBMITTED SEPARATELY

SITE PLAN LEGEND

- PROPERTY LINE
- SETBACK LINES PLANNING / CANNABIS
- FENCES
- NURSERY AREA
- SECURE WASTE AREA (SWA) - COMPOST
- SECURE MARKET AREA (SMA) - TEMPORARY TREES
- ACCESSORY STRUCTURES - SHEDS / SHACKS



1 ENLARGED SITE PLAN - PROPOSED
P = 80'-0"



NOT FOR CONSTRUCTION
DO NOT DISTRIBUTE

REFINED GENETICS

2897 Freedom Boulevard, Watsonville, CA 95076
APN: 0A9-091-31

ISSUED
10 Sept 2021

ENLARGED
SITE PLAN -
PROPOSED

A 13

Best Management and Operations Plan

2897 Freedom Blvd.
Watsonville, CA 95076

Refined Genetics, LLC

APN # : 04909131

Refined Genetics LLC, plans to avoid excessive grading because the site is already developed and already in current operation by a well known vegetable company. Our intent there is to merely swap out the vegetables with cannabis cultivation of 130,620 sqft. of cannabis nursery. At 2897 Freedom Blvd. Watsonville, CA, Refined Genetics LLC will propagate (multiply) nursery stock plant material and sell commercially produced plants to licensed cannabis cultivators within California. Our facility will not bring cannabis plants to full maturity and will be 100% focused on selling immature plant stock in the form of seeds and rooted plants.

A. Siting Criteria:

1. **Avoidance of Excessive Grading** – Planned cannabis cultivation areas and infrastructure have been carefully sited in order to prevent excessive grading or disturbance. No cannabis cultivation will take place on grades greater than 20% nor will any access roads or driveways used to access commercial cannabis facilities cross slopes greater than 20%.
2. **Minimizing Site Disturbance and Reducing Forest Fragmentation** – There is no existing forest at the proposed cultivation site, thus no forestry will be impacted by site development. The cultivation strategy is to grow cannabis directly in the native soil, thus none of the development will permanently alter the soil.
3. **Biological Assessments** – The County GIS shows no biotic resources at the property, thus no biotic assessment is required.
4. **Archaeological and Paleontological Surveys** – The County GIS shows that a portion of the property has archaeological resources, yet as the property has been commercially farmed for the past 100 years no archaeological or paleontological assessments are required.
5. **Historic Assessment of Structures 50 Years Old or More** – The site does not contain any structures 50 years older or more, thus no historic assessment is required.
6. **Preservation of Agricultural Lands** – The site plan and proposed development have been designed specifically to minimize loss of cultivable soils. All proposed structures are temporary and are sited in such a manner to remove as little land as possible from agricultural production thus preserving and promoting agriculture.

B. Site Design:

1. **Fencing and Security** – All cultivation areas at the property will be fenced. Coupled with the fencing, security cameras will also be installed to deter intruders and theft. Since we only have immature plant stock onsite, Refined Genetics LLC Nursery risk potential for theft is much lower than a traditional cannabis flower production facility that has shelf ready marijuana produced/stored onsite. Immature cannabis plants are generally not a target of theft on cannabis cultivation sites.
 - a. **Wildlife-Friendly Fencing and Neighborhood Compatibility** – Fencing specifications are based upon the Montana Fish, Wildlife, and Parks guide as per the BMOP.
 - b. **Lighting for Security** – Lighting necessary for security shall consist solely of motion-sensor lights and will avoid adverse impacts on properties surrounding the lot on which the cannabis activity is located. Please refer to the Security Plan on Sheet ___ for detail on lighting placement.
2. **Use of Impermeable and Permeable Surfaces** – The cultivation plan is to grow cannabis natively in the soil thus minimal impermeable or permeable surface development is required for cultivation activities.
3. **Visual Blending of Cannabis Infrastructure** – There is not an expected need to blend cannabis infrastructure. All existing and proposed infrastructure is built on commercial agriculture land to commercial agriculture standards.
4. **Water Resources – Drainage** – New and existing cannabis facilities at the property will meet County and State requirements for water drainage.
5. **Water Storage** – All water storage will comply with planning department regulations for tank construction and setbacks from structures.

C. Construction Requirements:

1. **Active Construction Requirements**
 - a. **Seasonal Restriction** – Construction will not take place during the rainy season.
 - b. **Roosting Bat or Nesting Bed Survey** – No clearance of existing mature vegetation will be required thus no survey should be required.
 - c. **Work Hours** – Construction will not be initiated until 30 minutes after sunrise, and all outdoor construction activity will cease 30 minutes prior to sunset.

- d. **Worker Environmental Awareness Program** – Any contractor and associated employees engaged in ground breaking activities shall participate in a pre-activity training program with a qualified biologist.
- e. **Prevention of Spread of Invasive Plants and Weeds** – In accordance with best agricultural practices, the property will be managed in such a way that minimizes and eliminates invasive plants and weeds. Proposed cultivation practices including cover crop and regenerative farming practices will reduce the presence of weeds and invasive plants.
- f. **Sediment Control Measures** – Sediment will be controlled via the Site Management Plan prepared for the State Water Resource Control Board.
- g. **Staging and Storage Areas** – Storage areas for fuel and fertilizers will be established which are compliant with current code. Please see Sheet ____.
- h. **Spill Containment** – Spill containment kits will be in place at the property for fuel and fertilizer storage.
- i. **Open Pipe Restriction** – Open pipes will be covered and securely capped when not in use as to avoid occupancy and/or entrapment of wildlife.
- j. **Open Trenches** – Any open trenches, pits, or holes with depths greater than 1 foot will be covered at conclusion of work each day.
- k. **Soils Placement** – Soils are placed in proximity the cultivation area which are far from any streams, wetlands, riparian area, and other sensitive habitats.
- l. **Intake Screens** – No surface water diversion is required at the property.
- m. **Vegetation Removal** – No vegetation will be required to be removed at the property.
- n. **Riparian Buffers** – Riparian buffer setbacks are satisfied at the property.
- o. **Post-Construction Revegetation** – Any revegetation required will be accomplished by using a local cover crop mix.

D. Operation Requirements:

1. Employees

- a. **Implement TDM Measures** – Employees are encouraged to carpool to the property.
- b. **Worker Rights and Safety** – The company, Refined Genetics, LLC., has workers comp insurance and complies with all applicable federal, state, and local laws and regulations governing California Agricultural Employers.

2. Herbivory Prevention Plan – Deer and other large herbivores will be excluded from cultivation space via wildlife friendly fencing. In addition, trees bordering the cultivation space are undisturbed to allow for raptor and owl habitats. Furthermore, preventative measures such as mowing and weed maintenance are regularly carried out which reduce rodent pressure. No chemicals or poison are used for herbivory prevention. Please see the Fence Details on Sheet _____ and the fence layout design on Sheet _____.

3. Riparian Buffer Protection – No cultivation or cultivation related activities are taking place in a riparian buffer zone.

4. Supplemental Light for Cultivators – No supplemental lighting will be used.

5. Pesticides, Fuel Storage, and Hazardous Materials – Use of pesticide products shall be in compliance with the State pesticide laws and regulations enforced by the County Agricultural Commissioner's Office and the California Department of Pesticide Regulation.

a. Pesticide Storage

- i. Pesticide and fertilizer storage facilities are located outside of riparian setbacks
- ii. Pesticides and fertilizers will be stored in sheds/canopies which protect materials from the weather. See Sheet _____ for pesticide and fertilizer storage locations.
- iii. All bags and boxes of pesticides and fertilizers will be stored off the ground on pallets.
- iv. Pesticides and fertilizers will be contained in bins capable of acting as secondary containment for the total volume of materials contained.
- v. Pesticide and fertilizer containers will be routinely checked for leaks or spills.
- vi. There is a spill kit located on site available to use to respond to any leaks or spills.

b. Pesticide Use

- i. We comply with all pesticide label directions as they pertain to personal protective equipment, application method, and rate, environmental hazards, longest reentry intervals and greenhouse and indoor use directions.
- ii. For all other pesticides, use complies with all label requirements including site and crop restrictions.
- iii. Cultivation manager has obtained a Pesticide Operator ID from Santa Cruz County Agricultural Commissioner.
- iv. Monthly pesticide use reports submitted to the Santa Cruz County Agricultural Commissioner.

c. Fertilizer Use

- i. Prior to applying fertilizers, evaluation is made of irrigation water, soils, growth media, and plant tissue to optimize plant growth and avoid over fertilization.
- ii. Fertilizers will be applied at or below label rates.
- iii. Fertilizers will not be applied in a way that will result in runoff that may contaminate ground or surface water. Fertilizer is applied as a foliar to the leaves or to the soil via drip irrigation.

d. Storage of Fuel – Fuel is stored and handled with applicable state and local laws and regulations.

- i. Fuel is stored more than 100 feet from any water source with no discharge path to water.
- ii. Proper storage instructions shall be posted and visible to all employees.
- iii. Supply of spill clean-up material shall be stored near the storage area.

6. Odor Abatement Plan – Odors due to outdoor cannabis cultivation at the Subject Parcel have been mitigated to the maximum extent possible given the topography of the site and neighboring sensitive receptors. Seasonal temporary cannabis harvest and storage trailers are located far away from any neighboring sensitive receptors.

7. Water Supply and Quality

a. California State Water Resources Control Board – Site management plan and nitrogen management plan are under development and will be sent to the State Water Board in

accordance with State annual cultivation license submittal. An application has been started with the State Water Board and the application fee has been paid. Refined Genetics, LLC. will be compliant with all regulations and requirements of the California State Water Resources Control Board.

b. Department of Fish and Wildlife – A Standard Agreement application has been filed with the Department of Fish and Wildlife and is under process. Refined Genetics, LLC will be compliant with all regulations and requirements of the California Department of Fish and Wildlife.

c. Water Tank Supply Management

i. Water to fill water tanks is sourced from a agricultural well located on the subject property.

1. All water used for cultivation purposes is sourced from the agricultural well.

d. Irrigation – Irrigation is conducted in a manner that does not result in waste or runoff from the cultivated area. Irrigation methods employed at the property are described below.

i. Timed drip irrigation.

ii. Evaporative barriers on exposed soils and pots.

iii. Irrigation only when soil is dry.

iv. Water at rates that avoid run off.

v. Regular inspection and maintenance of irrigation systems.

vi. Float valves and other checks in place to prevent overflow of water tanks.

vii. Constant effort to improve efficiency through technology and watering techniques.

viii. Documentation program in place for irrigation, meters installed to measure irrigation use.

8. Waste

i. **Green Waste Management** – All cannabis waste from operations will be mulched and composted on site in a secure, fenced area, including soil, plant material, and solid waste. The compost is split amongst plant material, soil, and

onsite livestock waste. Composting areas are not located in riparian areas. Soil is reused in propagation and other compost is used as soil amendment. See compost areas shown on Sheet _____

ii. **Litter Control** – Litter on site is controlled heavily, and all employees or contract labor cleans workspace at the close of the day. Dumpsters and trash cans for waste and recycling are provided in close proximity to the work site. See dumpster and recycling location on Sheet _____

9. **Alternative Energy Sources** – Cultivation takes place outdoors and requires very little supplemental power, only in the form of power for water pumps supplying irrigation.
10. **Energy Conservation** – Energy efficiency is maximized at the property by using only L.E.D energy efficient lighting at low voltage for our nursery and cultivation operations. We will not use high powered growing lights of any kind.
11. **Access Roads** – The existing access roads at property will continue to be used and will be maintained.
12. **Site Closure or Cleanup and Restoration Plan for Relocated Cultivation Sites** – No infrastructure specific to cannabis is being developed that will not be usable for traditional agricultural uses. A plan to safely remove any materials associated with developed will be created and used in the event of any site closure.