
**PROPERTY MANAGEMENT PLAN
FOR THE CANNABIS CULTIVATION OPERATION AT
BAR X RANCH, MIDDLETOWN, CALIFORNIA**

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1.0 INTRODUCTION

This Property Management Plan has been prepared to fulfill the requirements of **Ordinance No. 3084, an Ordinance Amending Chapter 21, Article 27 of the Lake County Code Pertaining to Cannabis Cultivation** (referred to herein as “**Ordinance**”).

“The intent of said plan is to identify and locate all existing cannabis and non-cannabis related uses on the property, identify and locate all proposed cannabis and non-cannabis related uses on the property, and describe how all cannabis and non-cannabis related uses will be managed in the future. The property management plan shall demonstrate how the operation of the commercial cannabis cultivation site will not harm the public health, safety, and welfare or the natural environment of Lake County.”

The Plan shall consist of the following sections: Air Quality, Grounds, Security, Stormwater Management, Cannabis Vegetative Materials Waste Management, Growing Medium Management, and Water Use. This Plan also includes project compliance monitoring and reporting.

This Property Management Plan is intended to be a “living” document, updated as necessary, such that when operational activities or processes are modified or replaced, the applicable sub-plans are revised to reflect these changes. Relevant sub-plans should also be amended whenever the goals of the Plan are not met, whenever a significant pollution event occurs, or whenever a violation notice is issued.

2.0 PROPERTY LOCATION AND PROJECT DESCRIPTION

Bar X Farms LLC, is seeking discretionary approval from Lake County for a Major Use Permit, UP 20-92, for commercial cannabis operations at 18655 and 20333 S State Highway 29, Middletown (APNs 014-250-07 and 14, respectively), as follows:

Sixty-Three (63) A-Type 3: "Outdoor" licenses: Outdoor cultivation for adult-use cannabis without the use of light deprivation and/or artificial lighting in the canopy area at any point in time. The applicant proposes 1,545,000 sq. ft. (35.5 acres) of commercial cannabis canopy area on APN 014-250-07 and 1,160,000 sq. ft. (26.6 acres) of commercial cannabis canopy area on APN 014-250-14, for a total of 62.1 acres of canopy within a cultivation area of approximately 75.6 acres (3,293,136 sq. ft.). The proposed project would include retrofitting an existing 16,250 sq. ft. (65 ft x 250 ft) barn for drying and curing of cannabis grown onsite.

A-Type 13 Self Distribution license

The proposed project would include the retrofitted 16,250 sq. ft. pole barn for drying and curing. Retrofitting of the existing barn would not occur until the appropriate grading and building permits have been obtained from Lake County.

At full buildout, the proposed cannabis operation would utilize approximately 80 acres (5%) of the 1594.6-acre Bar X Ranch (Ranch). The remainder of the Ranch would continue to operate as it has operated in the past, including cattle ranching and hay production.

A Biological Resources Assessment for the Ranch, updated September 30, 2021, and Botanical Survey Report, dated April 16, 2021, were prepared by Natural Investigations Co. (Natural Investigations Co., 2021). Natural Investigations Co. identified 87.6-acres, represented by ten (10) distinct sites, that are suited for the proposed project. These sites, referred to as "gardens", were selected to occur within active agricultural areas and to avoid all wetlands and channels, setbacks from watercourses and other natural resources, sensitive terrestrial habitats (serpentine soils, riparian, chaparral habitats), sensitive plant areas, steep slopes, and dense oak stands. The proposed cannabis cultivation would be setback a minimum 150 ft. from Class I watercourses and a minimum of 100 ft. from wetlands and from the top of bank all Class II, and Class III watercourses. The project would consist of development of outdoor cannabis gardens for cultivation of 62.1 acres of outdoor canopy at eight (8) of the garden areas. The proposed cannabis activities are to be co-located on the subject parcels in compliance with Lake County regulations. Details are summarized in Table 1 and on the Bar X Site Plans.

Table 1. Summary of cannabis cultivation canopy areas for each garden

Site Plan Sheet #	APN	Name	Cultivation Type	Canopy Area (sq. ft.)	Cultivation Area (acres)
7	014-250-07	Center Garden	Outdoor	60,000	1.2
7	014-250-07	West Center Garden	Outdoor	110,000	3.4
8	014-250-07	Riverside Garden	Outdoor	835,000	20.1
9	014-250-07	Northwest Garden	Outdoor	85,000	2.9
11	014-250-07	East Center Garden	Outdoor	455,000	11.4

10	014-250-14	Pasture Garden	Outdoor	845,000	25.8
10	014-250-14	Employee Parking (East Garden)	N/A	N/A	N/A
5	014-250-14	Southwest Garden #1	Outdoor	150,000	5.7
6	014-250-14	Southwest Garden #2	Outdoor	165,000	5.1
			Total	2,705,000	75.6

2.1. Hours and Dates of Operation

This cultivation operation is closed to the public. Visitation is only allowed when specific permission is granted.

The cultivation hours of operation are:

- Monday, from 6 a.m. to 8 p.m.
- Tuesday, from 6 a.m. to 8 p.m.
- Wednesday, from 6 a.m. to 8 p.m.
- Thursday, from 6 a.m. to 8 p.m.
- Friday, from 6 a.m. to 8 p.m.
- Saturday, from 6 a.m. to 8 p.m.
- Sunday, closed

Holiday hours: variable; TBD.

The Ordinance restricts deliveries and pickups to 9 a.m. – 7 p.m. on Monday through Saturday and 12 p.m. – 5 p.m. on Sunday.

2.2. Maps

Refer to Bar X Site Plans, Bar X Farms On-Site Parking and Traffic Circulation Plan, and Bar X Farms Left Turn Channelization Concepts.

3.0 TRAFFIC MANAGEMENT PLAN

A Focused Transportation Analysis (FTA) for the Bar X Ranch Cultivation Project was prepared by W-Trans on October 6, 2021. The FTA determined that a left-turn lane would be warranted during the p.m. peak hour (occurs weekdays between 4 p.m. and 6 p.m.) traffic under existing conditions and would continue to be warranted with the proposed project and recommended that a single left-turn lane be constructed at the middle driveway. The FTA recommended that internal access connections be provided on-site so that the proposed cultivation areas could be reached from the middle driveway and that the north and south driveways should facilitate emergency access only. These features have been incorporated into the proposed project.

Seasonal laborers would be contracted through a company that specializes in seasonal labor for cultivation, harvesting, and processing periods. Seasonal laborers would be required to vanpool to the site. Each van would be required to transport at least 8 employees. Fulltime employees will be encouraged to carpool.

To reduce the number of trips to and from the site, during the peak harvest season, onsite food service catering or an onsite food catering truck would be offered to all employees.

3.1. Left-Turn Lane

The project proposes constructing a left-turn lane for access to the middle driveway. Preliminary design concepts have been developed and incorporated into the proposed project. The left-turn lane will be designed and constructed to Caltrans' Design Standards. Design parameters were provided in the FTA. Construction of the left-turn land will not begin until full approval from Caltrans has been obtained through the State of California Encroachment Permit Process.

3.2. Temporary Traffic Control

Prior to construction of the left-turn lane, left-turn access to the site via the center driveway will be controlled using temporary traffic control measures, weekdays from 4 p.m. to 6 p.m. A Temporary Traffic Control Plan to accommodate left turns will be prepared and submitted to Caltrans for approval of an Encroachment Permit prior to operation of the project.

3.3. Monitoring and Reporting

The Ordinance requires compliance monitoring and annual reporting (Refer to Section 11.0 of this Plan). In addition to the required monitoring and reporting outlined in Section 11.0, the project will keep the following records and submit them to the County with the required annual reports.

The security plan requires a sign-in/sign-out procedure for all authorized personnel. The procedure will include the option to record if the employee carpooled to the facility.

A daily seasonal employee vanpool log will be kept. The log will be used to record, for all seasonal employees, the date, the van's license plate number, and the number of employees transported.

The following individual(s) are responsible for traffic management:

- Jed Morris, Property Manager, (707) 496-4690, jmorris@greenmatter.com

4.0 AIR QUALITY

4.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Air Quality:

- (a) *Intent: All cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District (LCAQMD).*
- (b) *In this section permittees shall identify any equipment or activity that which may cause, potentially cause the issuance of air contaminants including odor, and shall identify measures to be taken to reduce, control or eliminate the issuance of air contaminants, including odors.*
- (c) *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.*
- (d) *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.*
- (e) *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.*
- (f) *The applicant shall prepare an odor response program that includes (but is not limited to):*
- a. *Designating an individual(s) who is/are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.*
 - b. *Providing property owners and residents of property within a 1,000 foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.*
 - c. *Policies and procedures describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.*
 - d. *The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.*
 - e. *Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.*

The following Air Quality Study was prepared for this type of project and is bound separately:

- Natural Investigations Co. 2020. Air Quality Impact Assessment for Typical Cannabis Cultivation Operations in Lake County, California.

4.2. Air Quality Setting and Potential Pollutant Sources

The project is in the Lake County Air Basin. The Lake County Air Quality Management District (LCAQMD) regulates air quality in Lake County. The U.S. Environmental Protection Agency (EPA) sets acceptable levels for seven air pollutants, and then determines — with the help of states and local air districts — where those standards are or are not met. Lake County is currently in attainment for all federal and state ambient air quality standards.

Sensitive receptors: There are no sensitive receptors adjacent to the Property; public facilities such as schools and churches are greater than 1 mile away, in Middletown. The nearest neighboring residences are at least 1,000 feet away.

Short-term grading or construction emissions produces fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities from operation of tractors, tillers, etc., during site preparation. Construction emissions are caused by onsite or offsite activities. Onsite emissions principally consist of exhaust emissions (NOX, CO, ROG, PM10, and PM2. 5) from heavy-duty construction equipment, motor vehicle operation, and

fugitive dust from disturbed soil. Offsite emissions are caused by motor vehicle exhaust from delivery vehicles as well as worker commuter traffic, but they also include road dust (PM10). Construction impacts are temporary in nature and would occur over a 4 to 8 week period while preparing the cultivation areas.

Operational emission sources consist of mobile emissions and area source emissions. Mobile source emissions estimates are derived from motor vehicle traffic from staff commuting. Area source emissions estimates are derived from the consumption of propane, electricity, and consumer products, as well as emissions resulting from landscape maintenance. However, this cultivation operation does not require the significant use of propane, electricity, or other consumer products. Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. Electrical generators will only be used to supply temporary electrical service during emergencies.

Operation of the proposed cultivation operation would generate small amounts of carbon dioxide from operation of small engines, such as tillers, and from vehicular traffic associated with staff commuting. The generation of carbon dioxide would be partially offset by the cultivation of fast-growing Cannabis plants, which remove carbon dioxide in the air during photosynthesis. The proposed cultivation operations would not consume excessive amounts of energy because they primarily utilize the natural sun for cultivation. Solar voltaic arrays will provide some of the electricity demands.

CDFA (2017) concluded that cannabis cultivation activities under the CalCannabis Licensing Program would not generate a substantial number of vehicle trips and would not require intensive use of heavy equipment, and as such, would not degrade air quality or produce significant amounts of greenhouse gasses. CDFA (2017) summarizes the impacts from small cannabis cultivation operations as follows:

“Despite the potential air quality emission-generating sources described above that are associated with cannabis cultivation activities, it is not anticipated that the Proposed Program would conflict with or obstruct implementation of air quality plans for the numerous reasons outlined below. First, the cannabis cultivation activities under the Proposed Program would not be anticipated to generate a substantial number of vehicle trips (see Section 4. 12, Transportation and Traffic) that would affect air quality. In addition, outdoor and mixed-light cultivation activities would generally occur on such small acreages that these activities would often not require intensive use of heavy equipment.” (page 4. 3-30)

An air quality impact assessment was performed for this project by Natural Investigations Co. (2019). Construction emissions and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod)®, Version 2016. 3. 2 (California Air Pollution Control Officers Association, 2017). Model output and reports from CalEEMod are provided in the appendix of the air quality assessment. Default values were used unless otherwise indicated.

Results / Emissions Estimates

Construction and operational emissions are summarized in the following tables. The results are expressed as a range of potential emissions, because exact project details are not

available yet. To magnify any air quality impacts, the model was run using the worst-case scenarios, and emissions estimates are reported here using the unmitigated emissions values. The main sources of construction emissions are exhaust from heavy equipment and tailpipe emissions from cars and trucks. In the operational phase, no direct emissions will occur. Electrical consumption will contribute incrementally to greenhouse gas generation.

Lake County has adopted the Bay Area Air Quality Management District (BAAQMD) thresholds of significance as a basis for determining the significance of air quality and GHG impacts. Air emissions modeling performed for this project demonstrates that the project, in both the construction phase and the operational phase, will not generate significant quantities of ozone or particulate matter and does not exceed the project-level thresholds established by FRAQMD.

Comparison of Daily Construction Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions unmitigated (pounds/day)	BAAQMD Threshold (pounds/day)	Significance
ROG (VOC)	1 to 10	54	Less than significant
NO _x	10 to 20	54	Less than significant
CO	10 to 30	548	Less than significant
SO _x	< 1	219	Less than significant
Exhaust PM ₁₀	1 to 5	82	Less than significant
Exhaust PM _{2.5}	1 to 5	54	Less than significant
Greenhouse Gasses (CO _{2e})	2,000 to 3,000	No threshold established	Less than significant

Comparison of Daily Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions unmitigated (pounds/day)	BAAQMD Threshold (pounds/day)	Significance
ROG (VOC)	1 to 10	54	Less than significant
NO _x	1 to 5	54	Less than significant
CO	1 to 10	548	Less than significant
SO _x	< 1	219	Less than significant
PM ₁₀ (total)	1 to 2	82	Less than significant
PM _{2.5} (total)	1 to 2	54	Less than significant
Greenhouse Gasses (CO _{2e})	1 to 10	No threshold established	Less than significant

Comparison of Annual Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions (tons/year)	BAAQMD Threshold (tons/year)	Significance
ROG (VOC)	0 to 1	10	Less than significant
NO _x	0 to 1	10	Less than significant
CO	0 to 1	100	Less than significant
SO _x	0 to 1	40	Less than significant
PM ₁₀	0 to 1	15	Less than significant
PM _{2.5}	0 to 1	10	Less than significant
Greenhouse gasses (as CO ₂ or methane)	1 to 100	10,000	Less than significant

4.3. Permits

As required by the Ordinance, an Authority to Construct permit will be obtained pursuant to LCAQMD Rules and Regulations, if applicable, prior to construction of facilities described in this Property Management Plan. An Authority to Construct or Permit to Operate permit shall be maintained for the life of the project and listed in this Plan.

No LCAQMD permits are necessary to construct or operate the project as currently designed.

4.4. Dust Management

A Dust Control Management Plan was prepared for the project by William Vanderwall, P.E. and submitted to the County in May 2021. Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. The following practices are provided in the Dust Control Management Plan to control dust:

Cultivation Sites

- Install weed barrier between the raised canopy beds. Weed barrier shall be replaced every three years or as needed.
- Restrict tillage to prevent dust, emissions from fuel use, and loss of soil carbon.
- Minimize equipment passes to prevent dust and fuel-related emissions.
- Maintain oak trees, hedgerows, and other natural vegetation in non-farmed areas to stabilize soils, serve as wind barriers, and sequester carbon.

Unpaved Surfaces

- Maintain the structural integrity of graveled roads to support expected use rates and prevent dust emissions and soil losses via water runoff.
- Apply water daily to high use unpaved surfaces during dry conditions.
- Post signs on unpaved roads restricting speeds to 15 mph or less, and ensure employees avoid excess travel.

Agricultural Burning

- Only incidental burning of brush/limbs as normal ranch work shall be on site and only per Lake County Air Quality rules and regulations.

- No cannabis plants shall be burned.
- Cannabis waste products shall be composted onsite or disposed of in accordance with State regulations.

Employee Training

- All new hires shall be trained to limit emissions and to communicate activities and results to manager(s).
- Key topics are types and sources of emissions and impacts on human and environmental health; management plans, strategies, practices, and technologies; and pertinent regulations.

In addition, the following mitigation measures and Factsheets can be used to help control dust. On tilled earth and stockpiles, fugitive dust can be controlled by wetting the soil with a mobile water tank and hose, or by delaying ground disturbing activities until site conditions are not windy. Water applications may be concentrated during the late summer and early fall months, when soils have the lowest moisture content or when winds are severe. BMP Fact Sheets WE-1: Wind Erosion Control and NS-1: Water Conservation Practices will be implemented to provide dust control and prevent discharges from dust control activities and water supply equipment. Water application rates will be minimized as necessary to prevent runoff and ponding and water equipment leaks will be repaired immediately. During windy conditions (forecast or actual wind conditions of 25 miles per hour or greater), dust control may be applied to disturbed areas, including haul roads, to adequately control wind erosion. BMP Factsheet WM-3: Stockpile Management will be implemented using silt fences and plastic covers to prevent wind dispersal of sediment from stockpiles. The minimum amount of water should be used: refer to BMP Factsheet NS-1: Water Conservation Practices.

4.5. Odor Response Program

The following individual(s) are responsible for responding to odor complaints:

- Jed Morris, Property Manager, (707) 496-4690, jmorris@greenmatter.com

These individual(s) are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.

Property owners and residents of property within a 1,000 foot radius of the Cannabis facility should be provided with the contact information of the individual(s) responsible for responding to odor complaints. This facility will develop 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. When an odor complaint is received, it will be forwarded to the manager responsible for odor control. The complaint will be logged, including time and type of complaint, the location of the odor reception, and contact info of the person making the complaint. The incident will be investigated, and the problem identified. The manager will visit the site or facility in question and determine any deficiencies in the odor control system (where applicable) and identify remedies. These remedies should be implemented immediately. The manager will prepare a written response and send it by certified mail to the person who made the complaint. The correspondence should acknowledge the

complaint, describe the incident, and identify what remedial actions were taken. Each odor complaint will be logged in a master odor complaint logbook.

4.6. Odor Mitigation

Cannabis cultivation, especially during the flowering phase, generates volatile compounds (terpenes) that some people find objectionable. No significant odor impacts are anticipated from this cultivation operation, due to the limited population in the area, the small size of the cultivation operation, the setbacks from roads and property lines, and wind dilution/dispersal effects.

If odors become problematic, odor mitigation must be implemented. The cultivation operation should be analyzed to determine the source of odor emission and any concentrating effects. Mitigation can include some combination of the following administrative controls and engineering controls.

4.6.1. Administrative Controls

When cultivation is operational, this section should describe activities such as management responsibilities (e.g., isolating odor-emitting activities from other areas of the buildings through closing doors and windows). This section should describe the organizational responsibilities and the roles of the staff members who will be trained about odor control; the specific administrative and engineering activities that the training will encompass; and the frequency, duration, and format of the training (e.g., 60 minute in-person training of X staff, including the importance of closing doors and windows and ensuring exhaust and filtration systems are running as required). This section should include a description of the records that will be maintained (e.g., records of purchases of replacement carbon, performed maintenance tracking, documentation and notification of malfunctions, scheduled and performed training sessions, and monitoring of administrative and engineering controls). Any examples of facility recordkeeping forms should be included as appendices to this plan.

4.6.2. Engineering Controls

If odors become problematic, engineering controls may need to be implemented. The cultivation operation should be analyzed to determine the source of odor emission and any concentrating effects. Mitigation can include some combination of the following:

- Windscreens could be erected that could partially contain odors within the cultivation compound.
- Powerful fans could be installed to guide air flow in the opposite direction.
- Alterations to atmospheric controls (temperature, air exchange, humidity) using dehumidifier, HVAC system, and/or fans.
- A high-pressure atomizing system could be installed on the perimeter. This system generates a water vapor (aerosol) that binds with the volatile compounds from Cannabis (terpenes) and makes them heavier, and then they drop out of the air.
- Biofiltration is a technology in the research phase that uses filters made of an organic medium such as wood chips that are inoculated with bacteria and consume odorous molecules. Biofiltration may be successful at treating biodegradable VOCs, but it requires a large footprint and careful operation control.

- Odor absorbing neutralizers: use oils and liquids from plant compounds and mist them into the exhaust air at cultivation facilities to neutralize odorous VOCs. Contact your odor control supplier about the effectiveness of VOC reduction as it will vary (20%-90%) by product and contact time.
- Masking and counteractive agents: use of chemical odor control technologies that are misted at the cultivation facility's exhaust. The use of these agents may be subject to air quality regulations.
- An ozone generator. Ozone destroys volatile compounds upon contact. Ozone generators: are mostly used for sanitization purposes and have also been used in industrial settings to control strong odors. These generators are harmful to humans and can damage or destroy crops because they are a direct emission source of ozone pollution, therefore ozone generators are not recommended as a best practice for odor control (Denver Dept. of Health and Environment 2018).

5.0 GROUNDS

5.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section about grounds keeping:

(a)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:

- a. 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.*
- b. 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.*
- c. 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.*
- d. 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.*

(b)If the lot of record is bordered by grounds outside the applicant's control that are not maintained in the manner described in subsections (i) through (iv) of this section, inspection, extermination, and other reasonable care shall be exercised within the lot of record in order to eliminate any pests, dirt, and/or filth that pose a source of cannabis product contamination.

(c)Any other information as may be requested by the Director and/or by the Planning Commission.

5.2. Storage

Excess compost will be stored within the green waste and compost storage area specified and will be covered and surrounded by straw wattles to minimize loss of material. Fertilizers will be stored in the retrofitted barn or stormproof containers.

Pesticides will be used according to the instructions on the label or the material safety data sheets (MSDS). County regulations also apply to listed pesticides. Pesticides will be stored in proposed buildings so that stormwater is not contaminated. Chemicals will be properly labeled, and open containers sealed when stored.

5.3. Groundskeeping

Good housekeeping measures will be implemented. The grounds will be inspected at least once per day and any litter picked up. Trash containers will be emptied when full. Roads will be maintained so that they are function well and so that significant erosion does not occur. This may include wetting dusty roads, armoring unpaved sections with gravel, roadbase, or asphalt, patching holes, and maintaining drainage features such as water bars, culverts and side ditches. Weeds and grasses will be controlled by mulching or by cutting with a lawnmower or line trimmer. Drainage ditches and swales will be regularly mowed and cleaned, including the removal of litter, debris, and sediment. Containers, sediment traps and basins, and ditches will be drained so that mosquitos do not breed. Areas inside cultivation compounds can be graveled or paved to prevent foot-borne filth. Live traps may be deployed to remove rodents from operational areas; these must be checked regularly to prevent animal suffering. Disposable coveralls (e. g. Tyvek) can be used to increase sanitation levels and reduce vectoring of mites and other pests. A clothing changing station / mudroom can be provided for employees so that street clothing is separated from cultivation clothing.

Property maintenance will follow Best Management Practices. The following CASQA Industrial and Commercial Handbook BMP Fact Sheets are applicable:

- BG-40 Landscape Maintenance
- SC-41 Building & Grounds Maintenance
- SC-40: Contaminated or Erodible Areas
- SC-43 Parking Area Maintenance
- SC-44 Drainage System Maintenance

Wastes will be managed as specified in the Waste Management subsection.

5.4. Monitoring Program

The monitoring program consists of regular inspections of chemical storage areas, the immediate cleanup of spilled products, recordkeeping of quantities and types of fertilizers used, employee training in proper use and handling, and use of personal protective equipment.

6.0 SECURITY

6.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Security:

According to the Ordinance, the Property Management Plan must have a section on Security:

(a) 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.

(b) Security Plan. This section shall include at a minimum:

a. A description of the security measures to be taken to:

(1) Prevent access to the cultivation site by unauthorized personnel and protect the physical safety of employees. This includes, but is not limited to:

i. 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);

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

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

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

v. Establishing procedures for the investigation of suspicious activities.

(2) Prevent theft or loss of cannabis and cannabis products. This includes but is not limited to:

i. Establishing an inventory system to track cannabis material and the personnel responsible for processing it throughout the cultivation process;

ii. Limiting access of personnel within the premises to those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties;

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

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

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

(4) The permittee shall maintain a record of all complaints and resolution of complaints and provide a tally and summary of issues the annual Performance Review Report.

(5) A description of fences, location of access points, and how access is controlled.

(6) Video Surveillance.

i. At a minimum, permitted premises shall have a complete digital video surveillance system with a minimum camera resolution of 1280 X 720 pixel. The video surveillance system shall be capable of recording all pre-determined surveillance areas in any lighting conditions.

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

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

- iv. Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:
 - a. The perimeter of the cannabis cultivation site and cannabis nursery,
 - b. Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;
 - c. Areas where cannabis is destroyed;
 - d. Limited-access areas;
 - e. Security rooms;
 - f. Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and
 - g. The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.
- v. The surveillance system shall record continuously 24 hours per day and at a minimum of 30 frames per second.
- vi. All exterior cameras shall be waterproof, I-66 minimum.
- vii. All interior cameras shall be moisture proof.
- viii. Cameras shall be color capable.
- ix. Video management software shall be capable of integrating cameras with door alarms.
- x. Video recordings shall be digital.
- xi. Thermal technology shall be use for perimeter fencing.
- xii. All cameras shall include motion sensors that activates the camera when motion is detected.
- xiii. In areas with inadequate lighting for the cameras being used, sufficient lighting shall be provided to illuminate the camera's field of vision.
- xiv. All recording shall be located in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located.
- xv. All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.
- xvi. All video surveillance recordings are subject to inspection by the Department and shall be copied and sent, or otherwise provided, to the Department upon request.
- xvii. The video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images.

(7) Fences

- i. All commercial cannabis cultivation sites shall be enclosed by a fence. The fence shall include, at a minimum, the following: Posts set into the ground. The posts may be steel tubing, timber or concrete and may be driven into the ground or set in concrete. End, corner or gate posts, commonly referred to as "terminal posts", must be set in concrete footing or otherwise anchored to prevent leaning under the tension of a stretched fence. Posts set between the terminal posts shall be set at intervals not to exceed 10 feet. A top horizontal rail is required between all posts. The fence shall be attached to the posts and top horizontal rail.
- ii. No barbed wire, razor wire or similar design shall be used.
- iii. The cultivation area shall be screened from public view. Methods of screen may include, but is not limited to, topographic barriers, vegetation, or solid (opaque) fences.

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"All lights used for cannabis related permits including indoor or mixed light cultivation of cannabis shall be fully contained within structures or otherwise shielded to fully contain any light or glare involved in the cultivation process. Artificial light shall be completely shielded between sunset and sunrise.

Security lighting shall be motion activated and all outdoor lighting shall be shielded and downcast or otherwise positioned in a manner that will not shine light or allow light glare to exceed the boundaries of the lot of record upon which they are placed.”

6.2. General Security Measures

General security measures will consist of the following:

- A security plan, updated as needed;
- Staff screening process, including background checks;
- Personnel rules and responsibilities (to be incorporated into a employee handbook in the future);
- Physical barriers, including signage, road gates, security fencing with locked gates, and commercial-grade locks on all interior doors;
- Theft and loss control program;
- Video surveillance system.

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

- Jed Morris, Property Manager, (707) 496-4690, jmorris@greenmatter.com

Any complaints or problems associated with the operation of the commercial cultivation establishment will be directed to the Security Officer. The Security Officer should make every good faith effort to encourage neighborhood residents to call the designated Security Officer to resolve operating problems, if any, before any calls or complaints are made to the County. The Security Officer should maintain a record of all complaints and resolution of complaints and provide a tally and summary of issues the annual Performance Review Report. The Staff Screening Process is described in the Operations Manual subsection of this Plan.

Personnel rules and responsibilities are as follows (expand, as needed):

- Obey the rules of the Security Plan
- Sign in when entering the facility (or property) and sign out when exiting the facility (or property)
- Report suspicious activity
- Do not carry any weapons
- Do not take photos or record video; do not post to social media about the cultivation operation
- Do not engage in lengthy conversation with the public or respond directly to complaints: direct all such concerns to the Security Officer or to your supervisor.
- Only authorized vehicles are allowed in operational areas.
- Do not bring backpacks or other unnecessary storage devices that might complicate the theft control program. Lockers will be provided for personal items.
- Do not enter restricted areas unless authorized to do so.
- Re-lock gates after passing through.

The property has three (3) existing driveways accessed off of State Highway 29 (north, center, and south). The center driveway is the access entrance for the project. The northern and southern driveways shall be used for emergency access only. The gates at these two driveways

shall be locked and shall be signed as “Emergency Access Only”. Entrances will be secured with metal bar gates and padlocks and subject to video surveillance.

The cultivation operations are closed to the public. Visitation is only allowed when specific permission is granted. All staff, all suppliers, all product transporters, and all visitors must sign the log in / log out sheet. Signage will be posted that states that the operational areas have restricted access and are closed to the public. The signage will not advertise the presence of Cannabis products.

6.3. Staff Training and Theft and Loss Control

The County requires an inventory system to track Cannabis material and personnel handling the material. This requirement will be fulfilled by following the requirements of the CalCannabis Licensing Program, which creates a Track-and Trace System. Sections 8401 through 8405 (quoted in part) state:

“The Department shall establish a track-and-trace system for unique identifiers of cannabis and nonmanufactured cannabis products, which all licensees shall use. Each licensee shall report in the track-and-trace system the disposition of immature and mature plants, as required by Section 8402 of this Chapter, and nonmanufactured cannabis products on the licensed premises and any transfers associated with commercial cannabis activity between licensees.

(a) The licensee is responsible for the accuracy and completeness of all data and information entered into the track-and- trace system. Data entered into the track-and-trace system is assumed to be accurate and can be used to take enforcement action against the licensee if not corrected.

(b) Attempts to falsify or misrepresent data or information entered into the track-and-trace system is a violation and subject to enforcement.

(c) Each licensee shall use the track-and-trace system for recording all applicable commercial cannabis activities. Each licensee shall do all of the following activities:

(1) Establish an account in the track-and-trace system prior to engaging in any commercial cannabis activities associated with their license and maintain an active account while licensed;

(2) Designate at least one of the owners or the responsible party named in the application to be the track-and-trace system administrator....”

For this cultivation site, the Track-And-Trace System Administrator is:

- Jed Morris, Property Manager, (707) 496-4690, jmorris@greenmatter.com

Personnel will be granted access within the premises to only those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties. There will be supervision of tasks or processes with a high potential for diversion (including the loading and unloading of cannabis transportation vehicles). Supervision may include video surveillance and/or the requirement that the Security Officer or their designee be present.

An employee training program should be established to train staff in:

- Burglary prevention
- Employee loss prevention
- Armed robbery prevention, security breaches, and response
- Protocols for storage of large amounts of currency and/or cannabis

- Cannabis laws and employee responsibilities
- Identification and management of color-coded identification card and appropriate access areas
- Application and Live Scan process and procedures
- Policies for handling employees that do not wear identification cards on premise
- Inspection procedures for compliance checks and license renewals
- Escort policy for non-employee, or contractor visits
- Identification of limited access areas

6.4. Alarm System

The alarm system should be maintained by a licensed company with central monitoring capabilities. The alarm system may need to be permitted with the County. The alarm should contain a panic activation device for onsite employees. A responsible person should be required to respond within 30 minutes upon request.

6.5. Video Surveillance

Each cultivation facility will have a comprehensive digital video surveillance system. Each camera must have the following specifications, according to the Ordinance:

- minimum resolution of 1920 X 1080 pixels
- digitally record continuously 24 hours per day and at a minimum of 30 frames per second, color
- exterior cameras shall be waterproof, I-66 minimum
- interior cameras shall be moisture proof
- display the current date and time of recorded events
- sufficient lighting shall be provided to illuminate the camera's field of vision or infrared cameras will be used
- thermal (infra-red) motion sensing technology shall be used for perimeter fencing
- installed in a manner that prevents intentional obstruction, tampering, and/or disabling

The video management software shall be capable of integrating cameras with door alarms. The video surveillance system shall be capable of recording all pre-determined surveillance areas in any lighting conditions. The video surveillance system shall be capable of supporting remote access by the permittee. To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

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

- a. The perimeter of the cannabis cultivation,
- b. Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;
- c. Areas where cannabis is destroyed;
- d. Limited-access areas;
- e. Security rooms;

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

All recording shall be located in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located. All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days. Data transfer will be by coax cable or by WiFi router. Power supplies shall be self-contained, solar arrays and batteries.

Security cameras that meet the County and state requirements will be installed. Locations to be determined once building layout is known. Data transfer will be via a WiFi to a secure building where recordings are stored for a minimum of 30 days. These cameras can be remotely accessed.

6.6. Lighting

Adequate perimeter lighting must be installed inside and around the exterior of the premises and maintained in working order. A lighting plan shall be consistent with the requirements of County ordinances and should include the following:

- diagrams that identify all lighting on the lot (bulb type, wattage, lumens, sensors, etc.).
- security lighting should consist primarily of motion-sensor lights and avoid adverse impacts on properties surrounding the lot on which the cannabis activity is located.
- Any outdoor lighting used for the illumination of parking areas and/or loading areas, and/or for security, shall be fully shielded and directed downward.

The following light pollution abatement measures will be implemented, as applicable:

- Shielded directional flood lighting aimed so that direct glare is not visible from adjacent properties and not exceeding the allowed lumen output
- Ensuring that mixed-light or indoor growing facilities are fully shielded, and that no light escapes from these facilities.

The following best management practices will be implemented, as applicable (IDA 2020):

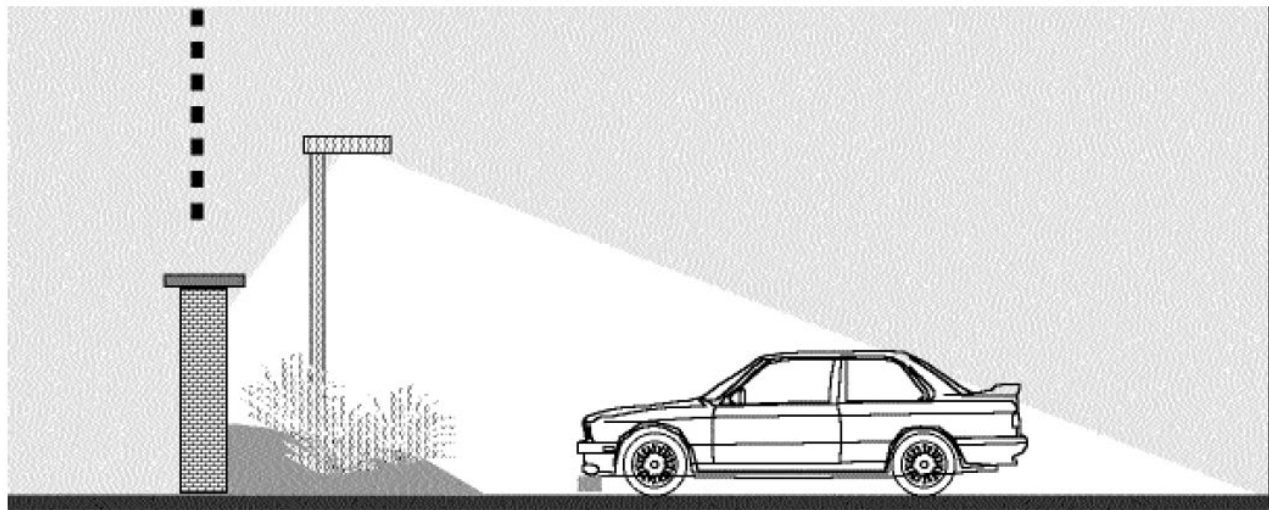
- LEDs and compact fluorescents (CFLs) can help reduce energy use and protect the environment, but only warm-colored bulbs should be used.
- Dimmers, motion sensors and timers can help to reduce average illumination levels and save even more energy.
- Outdoor lighting fixtures that shield the light source to minimize glare and light trespass help prevent light pollution.
- Switching to LED lighting allows for reduced illuminance without compromising visibility.
- Turn off unnecessary indoor lighting – particularly in empty office buildings at night.
- Avoid blue lights at night. Blue-rich white light sources are also known to increase glare and compromise human vision, especially in the aging eye. These lights create potential road

safety problems for motorists and pedestrians alike. In natural settings, blue light at night has been shown to adversely affect wildlife behavior and reproduction. IDA recommends that only warm light sources be used for outdoor lighting. This includes Low-pressure Sodium (LPS), High-pressure Sodium (HPS) and low-color-temperature LEDs.

130.34.020 Outdoor Lighting Standards

All outdoor lighting shall be located, adequately shielded, and directed such that no direct light falls outside the property line, or into the public right-of-way as illustrated in Figure 130.34.020.1 (Light Source Not Directly Visible Outside Property Perimeter).

Figure 130.34.020.1 - Light Source Not Directly Visible Outside Property Perimeter



Property Line

Source: Dark Sky Society

6.7. Fencing

The cultivation sites will be enclosed with a sturdy fence 6 to 8 feet in height. The posts should be set in the ground and should be made of steel tubing (at least 3-inch diameter) or wood posts (at least 4-inch diameter). Terminal posts should be set in concrete or otherwise anchored (such as with cables or diagonal bracing) to prevent leaning under the tension of stretched fence panels. Post interval should not exceed 10 feet. A top horizontal rail should be installed between each post interval. Fence panels should consist of metal mesh “cyclone” fabric or welded wire mesh. In some cases, wood panels can be used. Barbed wire or razor wire is prohibited from use on the top rails. If required by the County, opaque screening will be added: this may consist of plastic slats for cyclone fencing or plastic woven fabric (e.g., wind screens).

Each fenced cultivation compound will have at least 1 locking swing gate. The gate will typically consist of metal tube frame and the paneling will be the same as described above. The gate should be large enough for a service vehicle to ingress/egress. Property entrance

gates should be at least 14 feet wide to allow emergency vehicle access. The gates will be secured with a metal padlock. Keys or lock combinations should be controlled by the Security Officer. It is recommended that vegetation screening be planted to obscure views of the cultivation facilities from public roads.

7.0 STORMWATER MANAGEMENT

7.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Stormwater Management:

- (a) Intent: To protect the water quality of the surface water and the stormwater management systems managed by Lake County and to evaluate the impact on downstream property owners.*
- (b) All permittees shall manage stormwater runoff to protect downstream receiving water bodies from water quality degradation.*
- (c) All cultivation activities shall 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.*
- (d) Outdoor cultivation, including any topsoil, pest management, or fertilizer used for the cultivation cannabis shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.*
- (e) The illicit discharge of irrigation or stormwater 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 is prohibited.*
- (f) All permittees shall prepare a Stormwater Management Plan based on the requirements of the California Regional Water Quality Control Board Central Valley Region or the California Regional Water Quality Control Board North Coast Region to be approved by the Lake County Water Resources Department. In addition to those requirements, the plan shall include:

 - a. Identification of any Lake County maintained drainage or conveyance system that the stormwater is discharged into and documentation that the stormwater discharge is in compliance with the design parameters of those structures.*
 - b. Identification 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.*
 - c. Documentation that the discharge of stormwater from the site will not increase the volume of water that historically has flow onto adjacent properties.*
 - d. Documentation that the discharge of stormwater will not increase flood elevations downstream of the discharge point.*
 - e. Documentation that the discharge of stormwater will not degrade water quality of any water body.*
 - f. Documentation of compliance with the requirements of Chapter 29, Stormwater Management Ordinance of the Lake County Ordinance Code.*
 - g. Describe the proposed grading of the property.*
 - h. Describe the stormwater management system.*
 - i. 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.*
 - j. Describe what parameters will be monitored and the methodology of the monitoring program.**

For Cannabis licensing, Lake County also requires Erosion and Sediment Control Plans in accordance with Chapter 29 and 30 of the Lake County Code.

The State Water Resources Control Board regulates construction activities as follows:

If the total area of ground disturbance during construction of a project is 1 or more acres, the project proponent must enroll under the State Water Resources Control Board's Construction General Permit prior to the initiation of construction. In conjunction with enrollment under this Permit, a Stormwater Pollution Prevention Plan, Erosion Control Plan, and a Hazardous Materials Management/Spill Response Plan must be created and implemented during construction to avoid or minimize the potential for erosion, sedimentation, or accidental release of hazardous materials.

7.2. List of Stormwater Manager(s) and Contact Information

The Stormwater Manager(s) currently assigned to the cultivation operations are:

- Jed Morris, Property Manager, (707) 496-4690, jmorris@greenmatter.com

The stormwater manager shall have primary responsibility and significant authority for the implementation, maintenance, inspection, and amendments to the Stormwater Management Plan. Duties of the stormwater manager include but are not limited to:

- Ensuring full compliance with the Plan and the Chapter 29, Stormwater Management Ordinance of the Lake County Ordinance Code;
- Implementing all elements of the Plan, including but not limited to implementation of prompt and effective erosion and sediment control measures, and implementing all non-stormwater management, and materials and waste management activities (such as monitoring discharges (dewatering, diversion devices); general site clean-up; vehicle and equipment cleaning, fueling and maintenance; spill control; ensuring that no materials other than stormwater are discharged in quantities which will have an adverse effect on receiving waters or storm drain systems; etc.);
- Inspections (pre-storm, during storm, and post-storm) or designating qualified personnel to do so;
- Routine inspections as specified in the cultivation operation's specifications or described in the Plan;
- Preparing any annual compliance certification;
- Ensuring elimination of all unauthorized discharges;
- The stormwater manager shall be assigned authority to mobilize crews to make immediate repairs to the control measures;
- Coordinate with the landowner or cultivator to assure all the necessary corrections/repairs are made immediately, and that the project complies with the Plan and relevant permits.

7.3. Compliance

7.3.1. Setbacks and Buffers

The Ordinance requires that all cultivation operations be located at least 100 feet away from waterbodies (i. e. spring, top of bank of any creek or seasonal stream [interpreted to be Class II], edge of lake, wetland or vernal pool). The Water Board requires various setbacks depending upon the class of the watercourse. Setback distances were stated earlier in this Plan. Vegetated buffers should be maintained or created so that stormwater runoff can be detained and filtered by vegetation. This may include vegetated swales or bioswales.

7.3.2. Water Board Permitting

Bar X Ranch is enrolled with the State Water Resources Control Board (SWRCB) for Tier 2, Low Risk coverage under Order No. WQ 2019-001-DWQ (Cannabis Cultivation General Order). The Cannabis Cultivation General Order implements Cannabis Policy requirements with the purpose of ensuring that the diversion of water and discharge of waste associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, or springs. The site was assigned WDID No. 5S17CC429135. The Cannabis Cultivation General Order requires the preparation of a Site Management Plan (SMP), a Nitrogen Management Plan (NMP), and the submittal of annual technical and monitoring

reports demonstrating compliance. The purpose of the SMP is to identify Best Practicable Treatment or Control (BPTC) measures that the site intends to follow for erosion control purposes and to prevent stormwater pollution. The purpose of the NMP is to identify how nitrogen is stored, used, and applied to crops in a way that is protective to water quality. The SMP and NMP are required prior to commencing cultivation activities and were submitted with the application materials.

7.3.3. Grading, Discharge Flows, and Downstream Effects

Establishment of the cultivation operations will require some grading, but significant hydrologic effects are not expected because the cultivation compounds have been located on agricultural lands (hay fields and cattle pasture) that were conditioned and contoured decades ago. The cultivation operation will not alter the hydrology of the Property significantly. To alter the hydrology significantly, several acres of new impervious surfaces would need to be created.

The large vegetated buffers surrounding this facility, coupled with perimeter ditches and vegetated swales serve to moderate stormflows and regulate stream volumes such that flooding can be completely avoided. These large vegetated buffers and swales allow stormwater that is discharged from operation areas to be slowed, filtered, and percolate into soils. In general, stormwater on the Property infiltrates the soil. Should a new facility be planned and constructed that would significantly impact hydrological function, the Ordinance requires documentation that downstream hydrology and public roads and bridges will not be negatively impacted.

7.4. Stormwater Management

7.4.1. Water Pollution Control Schedule

BMPs should be deployed in a sequence to follow the progress of site preparation / tilling / cultivation. As the locations of soil disturbance change, erosion and sedimentation controls should be adjusted accordingly to control stormwater runoff at the downgrade perimeter and drain inlets. BMPs should be mobilized as follows:

- Year-round:
 - The site manager or stormwater manager should monitor weather using National Weather Service reports (<https://www.weather.gov/>) to track conditions and alert crews to the onset of rainfall events.
 - Disturbed soil areas should be stabilized with temporary erosion control or with permanent erosion control as soon as possible after grading or construction is complete.
- During the rainy season:
 - Disturbed areas should be stabilized with temporary or permanent erosion control before rain events.
 - Disturbed areas that are substantially complete should be stabilized with permanent erosion control (soil stabilization) and vegetation (if within seeding window for seed establishment).
 - Prior to forecast storm events, temporary erosion control BMPs should be deployed and inspected.
- During the non-rainy season:

- The project schedule should sequence earth-moving activities with the installation of both erosion control and sediment control measures. The schedule should be arranged as much as practicable to leave existing vegetation undisturbed until immediately prior to grading.

Sufficient quantities of temporary sediment control materials should be maintained on-site throughout the duration of the project, to allow implementation of temporary sediment controls in the event of predicted rain, and for rapid response to failures or emergencies. This includes implementation requirements for active areas and non-active areas before the onset of rain. The following table summarizes the general schedule of implementation of site BMPs.

Water Pollution Control Schedule

Phase, Activity, or Milestone	Date
File any needed permit registration documents	immediately
Implementation of rainy season BMPs	October 1 st of every year
Rainy season begins	October 15
Implementation of dry season BMPs	April 1 st of every year
Dry season begins	April 15
Repair / replacement of erosion control devices	see BMP section of this Plan
Site inspections	see Inspection section of this Plan
Submit Annual Report	annually, as required
Expansion / modification of cultivation operational area	modify this Plan within 30 days

Since, the project would disturb more than one acre in preparing the cultivation areas and constructing the parking area, the project may be subject to the requirements State Water Resources Control Board (SWRCB) Construction General Permit (CGP, 2009-009-DWQ). The SWRCB CGP would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and Erosion Control Plan which documents the stormwater dynamics at the site, the Best Management Practices (BMPs), and water quality protection measures that are used, and the frequency of inspections. BMPs are activities or measures determined to be practicable, acceptable to the public, and cost effective in preventing water pollution or reducing the amount of pollution generated by non-point sources. Obtainment of a CGP is also a BPTC Measure for compliance with the SWRCB General Order. The Construction General Permit does not cover disturbances of land surfaces solely related to agricultural operations such as disking, harrowing, terracing and leveling, and soil preparation.

7.4.2. Pollutant Source Identification

Inventory of Materials and Activities that May Pollute Stormwater

Construction or cultivation activities that have the potential to contribute sediment to stormwater discharges include:

- Tilling, grading and excavation operations;
- Soil import/export operations;
- Structure installation process; and
- Paving operations.

The following table provides a list of materials that may be used and activities that may be performed that will have the potential to contribute pollutants, other than sediment, to stormwater runoff.

Summary of Potential Project Pollutant Other Than Sediment

Activity/Material Type	Potential Pollutant
Vehicle lubricants and fuels, including oil, grease, diesel and gasoline, and coolants	Petroleum hydrocarbons, volatile organic compounds (VOCs)
Asphaltic emulsions associated with asphalt-concrete paving operations	Petroleum hydrocarbons, VOCs
Portland cement, masonry, and concrete products, muriatic acid, etc.	Materials with a low or high pH, materials with high alkalinity, metals
Road base and subbase material	Materials with high alkalinity or high pH, metals
Gardening materials and wastes	Pesticides, nutrient pollution (nitrates, phosphates, biological oxygen demand, etc.), metals
Treated lumber (materials and waste)	Arsenic, copper, other metals, creosote
Material packaging and site personnel	General litter (municipal solid waste, universal waste)
Portable toilets	Septic waste (fecal coliform, biological oxygen demand), sanitizers

7.4.3. Existing (pre-construction) Control Measures

The following are existing (pre-construction) control measures within the project site:

- vegetated drainage swales
- sufficient buffer distances between cultivation areas and drainages
- armoring of driveways and roads with gravel, roadbase, or asphalt
- side ditches and pipe culverts under roads
- rolling dips or water bars on steep road sections
- preservation of existing vegetation
- catch basins or sediment basins
- a bridge over the Class II watercourse

7.4.4. Best Management Practices

The following resources can be consulted for BMP selection and implementation:

- California Stormwater Quality Association. 2011. California Stormwater Best Management Practice Handbook – Construction. California Stormwater Quality Association, Menlo Park, California 886 pp.
- California Stormwater Quality Association. 2014. Stormwater Best Management Practice Handbook Portal: Industrial and Commercial. California Stormwater Quality Association, Menlo Park, California. 474 pp.
- California Department of Transportation’s Construction Site BMPs Handbook, available electronically at <https://dot.ca.gov/programs/construction/storm-water-and-water-pollution-control/manuals-and-handbooks>

- California Department of Transportation's Construction Site BMP Fact Sheets, available electronically at <https://dot.ca.gov/programs/construction/storm-water-and-water-pollution-control/construction-site-bmp-fact-sheets>
- USEPA NPDES Stormwater Program's National Menu of BMPs website at <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>

The following subsections discuss BMPs that have been selected for implementation in this project. Implementation and location of BMPs are shown in the Maps section. The Appendix includes a list of the fact sheets of the BMPs selected for this project.

Erosion Control

Erosion control, also referred to as soil stabilization, consists of source control measures that are designed to prevent soil particles from detaching and becoming transported in stormwater runoff. Erosion control BMPs protect the soil surface by covering and/or binding soil particles. This project will implement the following practices for effective temporary and final erosion control during construction:

- Preserve existing vegetation where required and when feasible;
- Apply temporary erosion control to exposed areas. Reapply as necessary to maintain effectiveness;
- Implement temporary erosion control measures at regular intervals throughout the defined rainy season to achieve and maintain stability. Implement erosion control prior to the defined rainy season;
- Control erosion in concentrated flow paths by applying erosion control devices.
- Divert run-on and stormwater generated from within the facility away from all erodible materials; and
- If sediment traps or basins are installed, ensure that they are working properly and emptied of accumulated sediment and litter.

Specific erosion control BMPs that can be implemented are listed here and the Construction and Industrial BMP fact sheets are included in the Appendix:

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

Erosion and sediment control diagrams are provided in the Maps section that indicate the recommended type and placement of erosion control devices.

Sediment Control

Sediment controls are structural measures that are intended to complement and enhance the selected erosion control measures and reduce sediment discharges from active construction areas. Sediment controls are designed to intercept and settle out soil particles that have been detached and transported by the force of water. This project will incorporate sediment control measures as needed.

Specific sediment control BMPs that can be implemented are listed here and the Construction BMP Fact Sheets are included in the Appendix:

- SE-1: Silt Fence
- SE-2: Sediment Basin
- SE-3: Sediment Trap
- SE-5: Fiber Rolls
- SE-6: Gravel Bag Berm
- SE-8: Sand Bag Barrier
- SE-9: Straw Bale Barrier
- TC-32: Bioretention

Erosion and sediment control diagrams are provided in the Maps section that indicate the recommended type and placement of sediment control devices.

Road Maintenance

Note that the Cannabis General Order states: “*Site development and/or road building and maintenance activities associated with cannabis cultivation are subject to this General Order.*”

This Property has several vehicle stream crossings, primarily in the center of the Property. There is a bridge (concrete slab) over the unnamed Class II watercourse downstream of the pond. There are several pipe culvert crossings on Class II watercourses. The driveways and access roads are typically armored with gravel or roadbase and follow ridgelines and gentle contours. Most sections are well armored. Additional gravel or roadbase is recommended in some locations. There are some rolling dips and water bars; several additional rolling dips and water bars are recommended. Driveways and roads will be maintained so that significant erosion does not occur. This may include wetting dusty roads, armoring with gravel, roadbase, or asphalt, patching holes, and maintaining drainage features such as rolling dips, water bars, culverts, and side ditches.

The following guidebook should be referenced for road maintenance:

- Handbook for Forest, Ranch, & Rural Roads: A Guide for Planning, Designing, Constructing, Reconstructing, Upgrading, Maintaining, and Closing Wildland Roads. [available at: <http://www.pacificwatershed.com/sites/default/files/RoadsEnglishBOOKApril2015b.pdf>]

Monitoring / BMP Inspection and Maintenance

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

A visual monitoring (inspection) program should be implemented, and an inspection would ideally be performed prior to each qualifying rain event and contain the following focal areas:

- All stormwater drainage areas to identify any spills, leaks, or uncontrolled pollutant sources
- All BMPs to identify whether they have been properly implemented
- Any stormwater storage and containment areas to detect leaks and ensure maintenance of adequate freeboard

Note that stormwater sampling procedures are discussed in the Water Use subsection.

Training

A copy of the Plan should be made available to the site personnel or contractor representatives engaged in the maintenance or installation of BMPs. Site inspectors observing pollution caused by ineffective construction or cultivation practices should inform site personnel of appropriate and proper erosion and sedimentation control practices, along with special follow-up inspection for further training. The Stormwater Manager or general contractor should organize orientation sessions with all installation, inspection, and maintenance personnel upon initiation of a specific project activity or change in key personnel. These sessions should be setup to ensure that all contractor and sub-contractor operations are implemented in accordance with this Plan. Training sessions should be included as part of regular safety meetings to familiarize works with the requirements of the Plan.

8.0 CANNABIS VEGETATIVE MATERIAL WASTE MANAGEMENT

8.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Cannabis Vegetative Material Waste Management:

The cannabis vegetative material waste management section shall include:

- (1) Provide an estimate of the type and amount of cannabis vegetative waste that will be generated on an annual basis.*
- (2) Describe how the permittee will minimize cannabis vegetative waste generation.*
- (3) Describe how solid waste will be disposed.*
- (4) 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.*

8.2. Cannabis Vegetative Material Waste Management

8.2.1. Types and Volumes of Green Waste

Sources of cannabis vegetative material waste on this cultivation operation may consist of leaves, stems, and root balls that remain after flower harvest, trimming and grooming during cultivation, and whole dead plants.

Volume of green waste generated by per acre is estimated to be ten (10) cubic yards per canopy acre per year.

Cannabis green waste will be weighed daily, weekly, or as needed, and data shall be recorded in Metrc (track and trace) for reporting requirements. Cannabis waste should be shredded and mixed with at least an equal amount of compostable materials such as food waste, yard waste, or growing medium (to render the cannabis unconsumable). Cannabis waste must be kept inside the locked fence or other locked compound at all times.

If cannabis waste is to be disposed offsite, it should first be shredded and blended with an equal part of non-consumable material, such as cardboard. Cannabis waste must be kept inside the locked garden area or other locked compound until ready for transport. It would then be transported as solid waste to the proper disposal facility.

Non-cannabis green waste will be shredded in a wood-chipper, as necessary. Vegetative waste will be mixed with soil and inoculated with humus and composted. If vegetative waste is composted, compost heaps should be at least one cubic yard in size to generate and sustain necessary heat for composting (to sustain aerobic digestion). Compost heaps should be segregated into batches as they age, with humus being the resulting product after several weeks of composting. Compost heaps should be turned often to encourage aeration and aerobic digestion and supplemental water added to keep the heaps moist, but not wet (to discourage anaerobic digestion).

Sources of non-Cannabis green waste on this cultivation operation consist of the following:

- spent soil, mulch, humus, etc.

- landscape maintenance: lawn and weed trimmings, fallen leaves and twigs, treated lumber, wood fencing, etc.

The volume of non-Cannabis green waste that is generated on the property is estimated to be: 1 cubic yard per month per acre, or 12 cubic yards per acre per year

8.2.2. Handling and Disposal of Cannabis Vegetative Waste

There will be a dedicated area in each cultivation compound where Cannabis waste is handled. This area will be surveilled by video camera, and Cannabis waste will be weighed at regular intervals as part of the Track and Trace Program. Cannabis waste will be handled with appropriate PPE, including long-sleeved shirts, pants, boots, dust mask, eye protection, and gloves. Cannabis waste will be composted onsite. Cannabis waste will be stored, handled, and disposed following Section §17223 *Waste Management* of the California Department of Cannabis Control (DCC) regulations in California Code of Regulations, Title 4, Division 19.

9.0 GROWING MEDIUM MANAGEMENT

According to the Ordinance, the Property Management Plan must have a section on Growing Medium Management:

The growing medium management section shall include:

- (1) 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.*
- (2) Describe how the permittee will minimize growing medium waste generation.*
- (3) Describe any non-organic content in the growing medium used (such as vermiculite, silica gel, or other non-organic additives).*
- (4) Describe how growing medium waste will be disposed.*
- (5) 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.*

The CDFA CalCannabis Program describes soils handling as follows:

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

“Outdoor cultivation typically involves planting rooted cannabis cuttings or seeds in the early spring and harvesting the plants in the fall (mid-September through November), after the plants flower. Soils used in the pots or grow bags are typically amended to ensure that nutrients are available to the plants throughout the growing season. Compost teas, which are created by steeping compost material in water, may also be used to fulfill nutrient needs (Ingham 2014). Water and nutrient supplement needs for outdoor cultivation may vary depending on the type of growing container selected. For example, raised beds typically require more watering and additional liquid nutrient application compared to other growing container options.” (CDFA 2017)

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

9.1.3. Types and Volumes of Growing Medium

A growing medium or grow medium is the matrix that the Cannabis plant is cultivated in. The three main types of grow mediums for Cannabis plants are soil mixes, soil-less mixes, and hydroponics. The types differ in how nutrients, oxygen, and water are delivered to the plant, and how the roots are anchored.

Soil mixes combine soil with amendments, such as peat, humus (compost), worm castings, and perlite. Soil mixes naturally contain some nutrients, which means it will provide the nutrients Cannabis plants need for at least the first few weeks of life; supplemental fertilizer may be needed. Soil-less growing medium is composed of inert (non-living soil) ingredients like coco coir, perlite, peat moss, rockwool, or vermiculite. Because there are no nutrients in these inert substances, all nutrients must be delivered by irrigation. Hydroponics growing mediums use containers to suspend the roots over a water bath. Nutrients are introduced into the bath.

The specific cultivation methods are not known at this time. The growing medium for this cultivation operation is anticipated to be either topsoil which is imported or native soil amended with imported organics. Exact volumes are not known at this time. When the cultivation operation is established, this Plan should be updated with specific information.

9.1.4. Growing Medium Handling, Disposal, and Waste Reduction

Growing media waste can be reduced or eliminated by composting and blending old soils with new soils and amendments. No significant amounts of growing media are expected to be disposed. Instead, media is reduced in volume yearly because it is absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Soil staging areas and compost piles will be located near each cultivation site. Cannabis green waste must be stored inside a secure area. BMPs will be employed to ensure that these piles do not contaminate stormwater or cause nuisance dust or odor issues.

10.0 WATER USE

10.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Water Use:

- (a) Intent: To conserve the County's water resources by minimizing the use of water.*
- (b) All permitted activities shall have a legal water source on the premises, and have all local, state, and federal permits required to utilize the water source. If the permitted activity utilizes a shared source of water from another site, such source shall be a legal source, have all local, state, and federal permit required to utilize the water source, and have a written agreement between the owner of the site where the source is located and the permitted activity agreeing to the use of the water source and all terms and conditions of that use.*
- (c) Permittee shall not engage in unlawful or unpermitted drawing of surface water.*
- (d) The use of water provided by a public water supply, unlawful water diversions, transported by a water hauler, bottled water, a water-vending machine, or a retail water facility is prohibited.*
- (e) Where a well is used, the well must be located on the premises or an adjacent parcel. The production well shall have a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. The methodology of the monitoring program shall be described. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The monitoring wells shall be constructed and monitoring begun at least three months prior to the use of the supply well. An applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually.*
- (f) Water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The application shall notify the Department within 7 days of the emergency and provide the following information:*
 - a. A description of the emergency.*
 - b. Identification of the retail water supplier including license number.*
 - c. The volume of water supplied.*
 - d. Actions taken to prevent the emergency in the future.*
- (g) All permittees shall prepare a Water Use Management Plan to be approved by the Lake County Water Resources Department. Said plan shall:*
 - a. Identify the source of water, including location, capacity, and documentation that it is a legal source.*
 - b. Described the proposed irrigation system and methodology.*
 - 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.*

10.2. Water Availability Analysis

10.2.1. Water Source and Supply

There is one (1) existing, permitted groundwater well that will be used for cultivation (Lat/Long 38.76947, -122.59708). The well is approximately 215 feet deep and was drilled in January 2021. The well is screened between 40 and 60 feet and 180 and 215 feet below the ground surface (bgs). During the drilling of the well, the depth of first water was at 60 feet bgs and the static water level was estimated to be 30 feet bgs.

The well yield measured when the well was drilled is 800 gpm (1290.4 acre-feet per year). To confirm the well capacity and assess the drawdown, a 4-hour well pump test was conducted on October 19&20, 2021 by Pollack and Sons Pump. The existing 75 HP well pump was used to conduct the test. The static water level at the beginning of the test was 34 feet bgs. During the test, the water level dropped to 140 feet bgs and remained at that level the duration of the pump test, which was conducted at 625 GPM during the entire 4-hours. After 24-hours, the

water level returned to 34 feet bgs. Pollack and Sons Pump reported that the well could produce more water with a larger pump installed.

10.2.2. Project Water Demand

The CalCannabis Environmental Impact Report (CDFA, 2017) uses 6.0 gallons per day per plant as an estimated water demand for cannabis cultivation. This is 1.0 gallons (gpd) per plant more than reported by Bauer et. el. (2015), who reported up to 5.0 (gpd) per plant (18.9 Liters/day/plant). Using the more conservative estimate of 6.0 gpd, and assuming there are approximately 500 plants per acre of canopy (CDFA, 2017), the demand is 3,000 gpd (2.1 gallons per minute [gpm]) per acre of canopy; this use rate is consistent with the Water Use Management Plan section (Section 16.2) of the project's Property Management Plan. The total estimated water demand is as follows:

- Daily
 - 186,300 gpd (130.4 gpm)
- Yearly (cultivations season ranges between 120 and 180 days)
 - 68.6 to 102.9 acre-feet (AF)

The potential daily demand of 130.4 gpm represents 16.3% of the well yield and between 4.9-8.0% of the annual well production in acre-feet.

10.2.3. Irrigation Methodology

Irrigation for the cultivation operation will use water supplied by the existing well. The irrigation water would be pumped from the well, via PVC piping, to approximately 27, 5,000-gallon water storage tanks (135,000 gallons of storage) located on a ridge adjacent to Southwest Garden #2, and then delivered to the individual gardens via an above ground, gravity water distribution system. Drip irrigation systems will be used at each garden. The drip lines will be sized to irrigate the cultivation areas at a rate slow enough to maximize absorption and prevent runoff. Drip irrigation systems, when done properly, conserve water compared to other irrigation techniques.

10.2.4. Water Conservation

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

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

CASQA Construction BMP Fact Sheet NS-1: Water Conservation Practices should be implemented to prevent discharges from water supply equipment. Water application rates

should be minimized as necessary to prevent runoff and ponding and water equipment leaks should be repaired immediately. Implement Construction BMP Fact Sheet NS-7: Potable Water / Irrigation to manage the potential pollutants generate during discharges from irrigation lines and unplanned discharges from water sources.

11.0 MONITORING AND REPORTING FOR COUNTY LICENSING

11.1. Requirements / Goals

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

6. Compliance Monitoring

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

7. Annual Reports

i. Performance Review

(a) All cannabis permittees shall submit a "Performance Review Report" on an annual basis from their initial date of operation for review and approval by the Planning Commission. The Planning Commission may delegate review of the annual Performance Review Report to the Director at the time of the initial hearing or at any time thereafter. This annual "Performance Review Report" is intended to identify the effectiveness of the approved development permit, use permit, Operations Manual, Operating Standards, and conditions of approval, as well as the identification and implementation of additional procedures as deemed necessary. In the event the Planning Commission identifies problems with specific Performance Review Report that could potentially lead to revocation of the associated development or use permit, the Planning Commission may require the submittal of more frequent "Performance Review Reports. "

(b) Pursuant to sub-section 6. i. above, the premises shall be inspected by the Department on an annual basis, or less frequently if approved by the Director. A copy of the results from this inspection shall be given to the permittee for inclusion in their "Performance Review Report" to the Department.

(c) Compliance monitoring fees pursuant to the County's adopted master fee schedule shall be paid by permittee and accompany the "Performance Review Report" for costs associated with the inspection and the review of the report by County staff.

(d) Non-compliance by permittee in allowing the inspection by the Department, or refusal to pay the required fees, or noncompliance in submitting the annual "Performance Review Report" for review by the Planning Commission shall be deemed grounds for a revocation of the development permit or use permit and subject the holder of the permit(s) to the penalties outlined in this Code.

The Cannabis General Order has annual monitoring and reporting requirements as follows:

A. Annual Report

Annual Reports shall be submitted to the Regional Water Board by March 1 following the year being monitored. For example, the monitoring report for activities conducted in the year 2018 is due on March 1, 2019. The Annual Report shall include the following:

1. Facility Status, Site Maintenance Status, and Stormwater Runoff Monitoring.
2. The name and contact information for the person responsible for operation, maintenance, and monitoring.

A letter transmitting the annual report shall accompany each report. The letter shall summarize the numbers and severity of violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent.

12.0 LITERATURE CITED AND FURTHER READING

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Pacific Watershed Associates. 2015. Handbook for Forest, Ranch, & Rural Roads: A Guide for Planning, Designing, Constructing, Reconstructing, Upgrading, Maintaining, and Closing Wildland Roads. Available at:

<http://www.pacificwatershed.com/sites/default/files/RoadsEnglishBOOKapril2015b.pdf>

USEPA NPDES Stormwater Program's National Menu of BMP's website at <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>

13.0 MAPS AND EXHIBITS

14.0 APPENDIX: CASQA INDUSTRIAL AND COMMERCIAL HANDBOOK BMP FACT SHEETS

15.0 APPENDIX: PEST MANAGEMENT GUIDELINES

16.0 APPENDIX: MATERIAL DATA SAFETY SHEETS

Insert here or bind separately

17.0 APPENDIX: EMPLOYEE MANUAL

Bound separately

18.0 APPENDIX: LOG OF INSPECTIONS, RECORDS, AND DATA COLLECTION

Insert here or bind separately