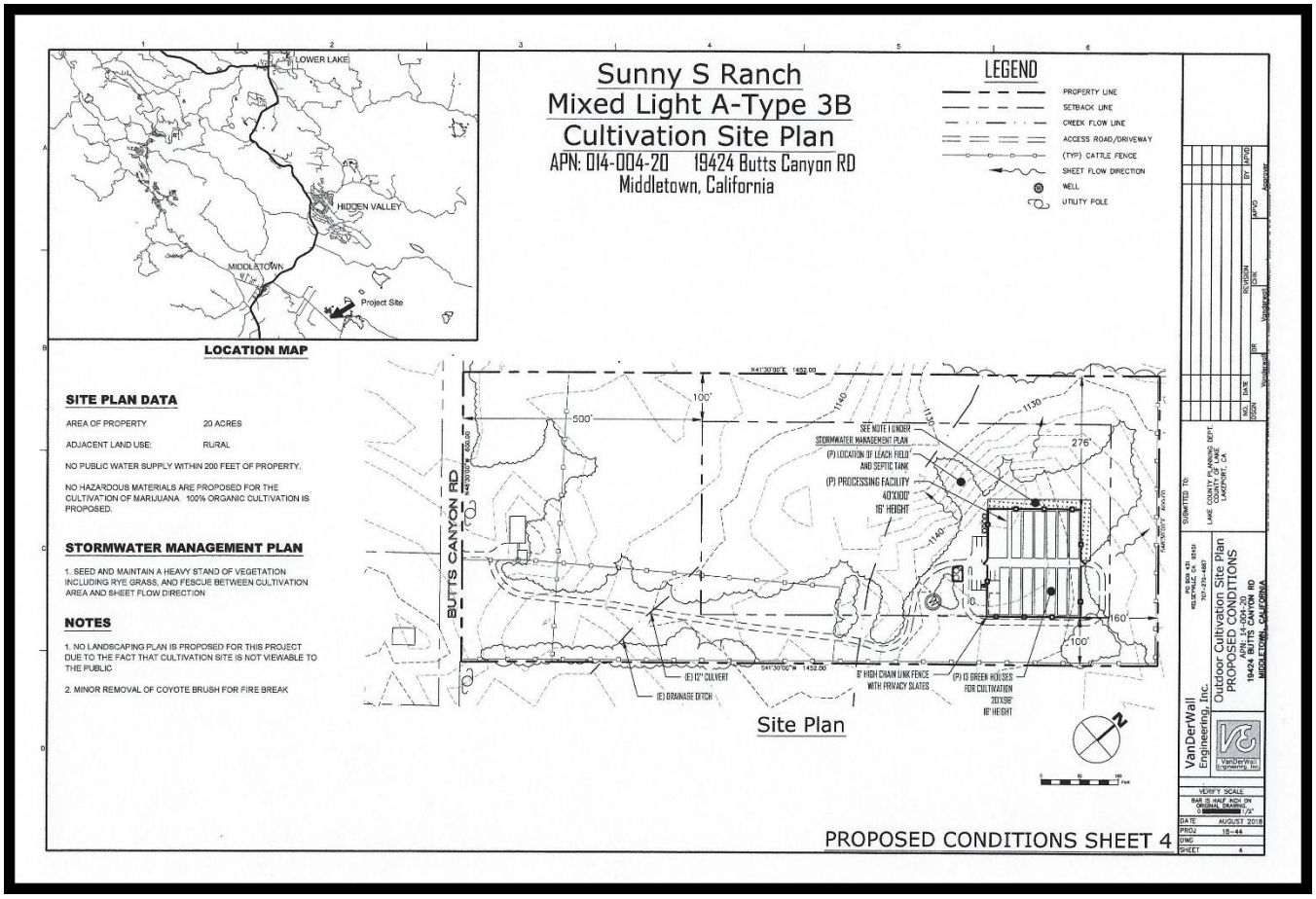


Property Management Plan

Sunny S Ranch, LLC

19424 Butts Canyon Road

Middletown, California 95461

October 4, 2018

Introduction

In March of 2018, the Lake County Board of Supervisors adopted Ordinance No. 3073, regulating commercial cannabis cultivation. The intent of the Ordinance is to establish regulations for the cultivation of cannabis in order to protect the public peace, health, safety, welfare and environment in Lake County. The Ordinance also helps support conformance with the applicable provisions of the California Business and Professions Code and the Health and Safety Code.

State Laws and Regulations

California Senate Bill 94, commonly referred to as the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), approved by Governor Brown in June 2017 is the primary piece of legislation that establishes the State of California's regulatory program for cannabis.

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

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

Lake County Regulations

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

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

On March 20, 2018, the Board of Supervisors adopted Ordinance No. 3073, an amendment to Article 27 of the Zoning Ordinance, creating a regulatory program for adult cannabis use, qualifying patients, primary caregiver cannabis cultivation, and commercial cannabis cultivation. The commercial cannabis cultivation regulatory program consists of three different types of permits: a zoning permit, a minor use permit, and a major use permit.

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

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

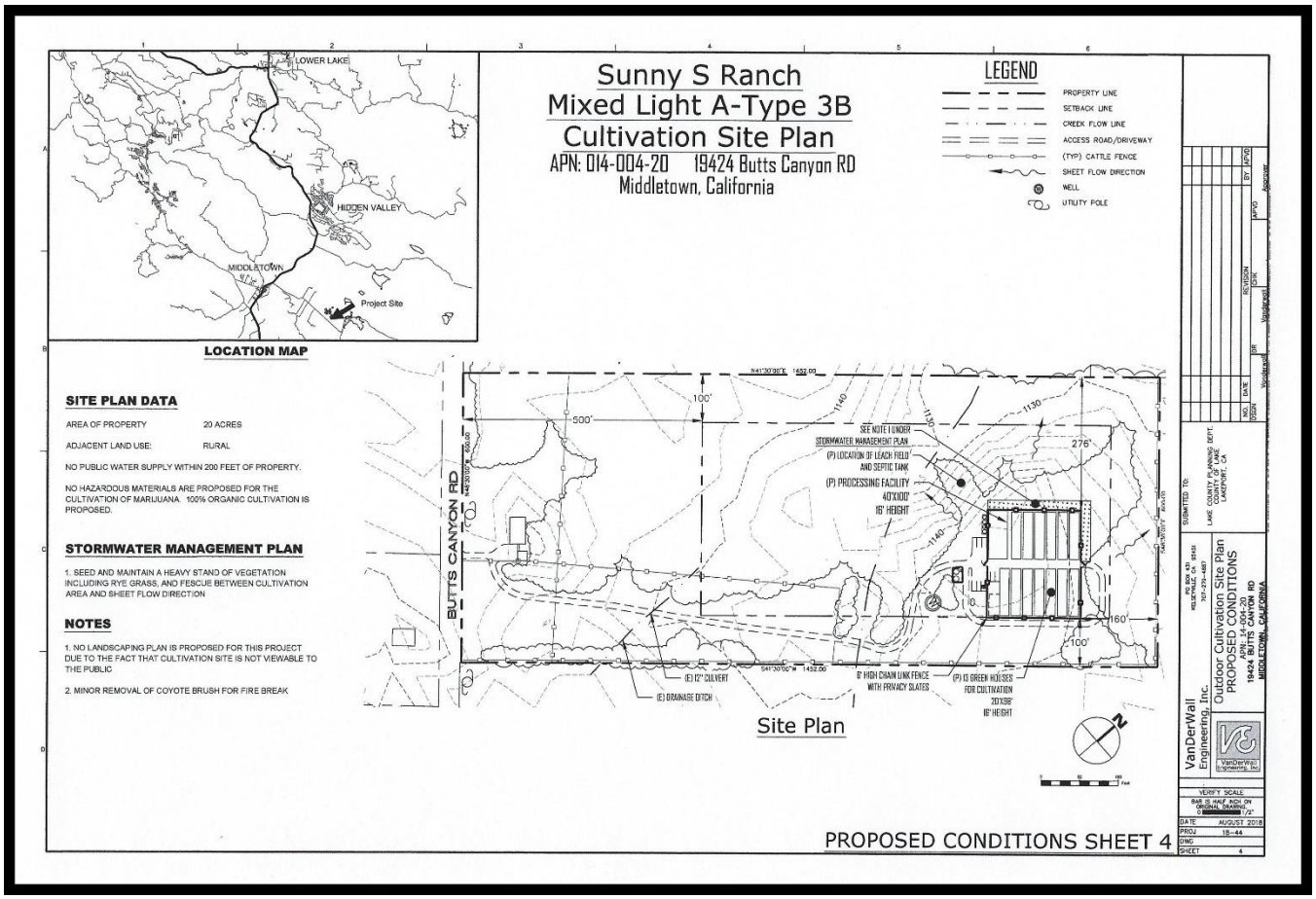
- Enrollment in the applicable Regional Water Quality Control Board or State Water Resources Control Board as of March 20, 2018.
- Complete a pre-application conference and achieve a minimum score of 75% on performance standards.
- A location within an APZ - Agriculture Preserve Zone, A – Agriculture Zone, TPZ - Timber Preserve Zone, RL - Rural Lands Zone, RR - Rural Residential Zone, or SR - Suburban Reserve Zone.
- Not located within a cannabis cultivation exclusion zone.
- Apply for Use permit and obtain Planning Commission approval.
- Duration of Use Permit up to ten years.

Project Description

The Sunny S Ranch (SSR) Cannabis Cultivation project is a proposed A-Type 3B Mixed-light farming operation on a 20-acre parcel located at 19424 Butts Canyon Rd. in Lake County, California -- APN 004-004-20.

The parcel is on the north side of Butts Canyon Road, approximately 3.75 miles east of Middletown. The land fronts directly on Butts Canyon Road, a paved County-maintained roadway. There is a paved driveway approach providing site access to the house, garage, and pasture area.

The property is a 600' x 1452' rectangular shaped parcel containing 20 acres of land area. It is developed with an existing single-family house (manufactured home), a garage, a storage container, open area, and fenced pastureland.

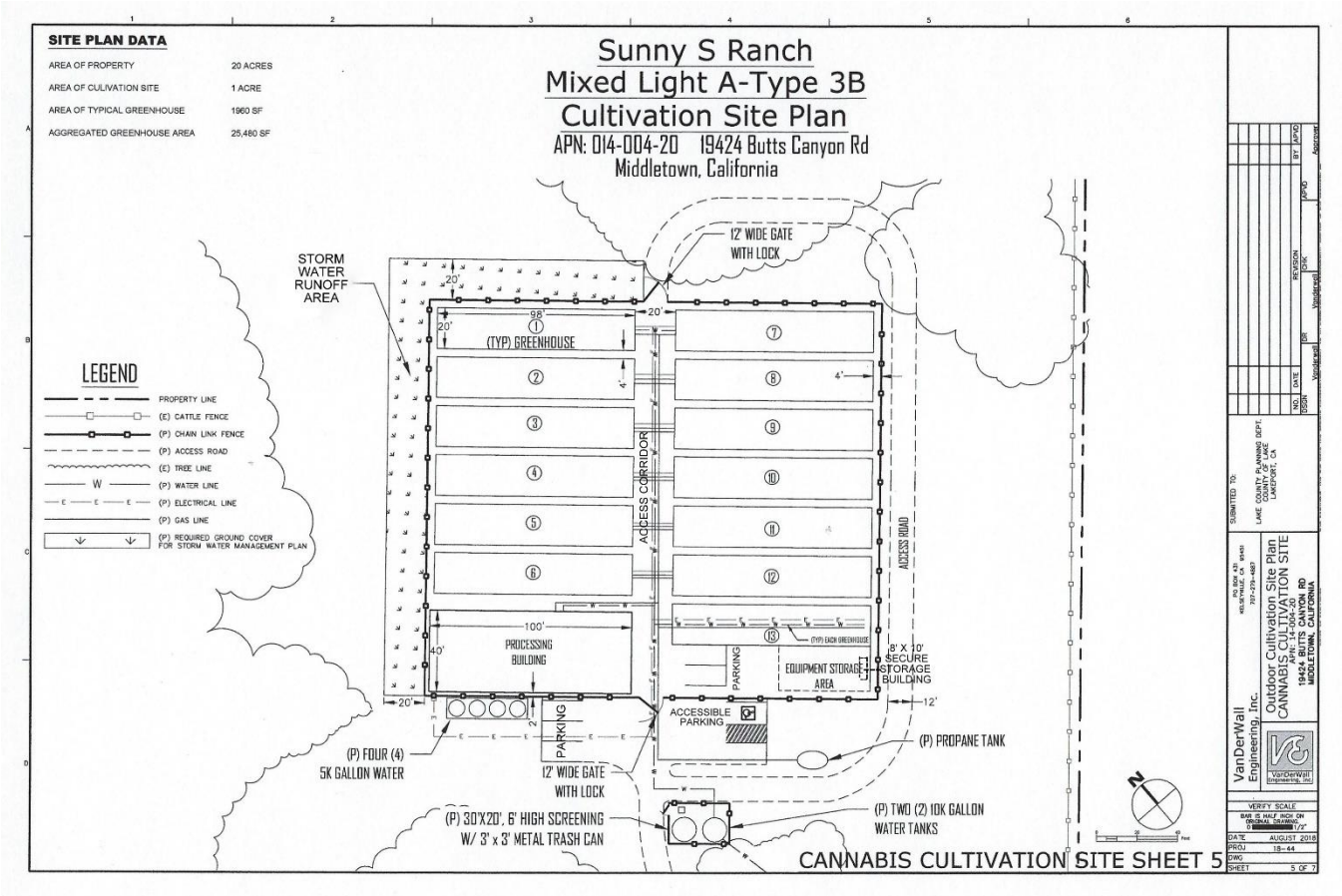


The SSR cannabis cultivation facilities will be developed and operated within a 1 acre fenced enclosure as depicted on the attached site plans. The cannabis cultivation facilities will be set back over 1,065' from the Butts Canyon Road frontage and will not be visible from the road or from adjoining properties. Setbacks of 100' from the southern property line, 160' from the rear property line, and 276' from the northern property line will be established and maintained.

The 1 acre fenced enclosure will essentially be a square shaped area with an outside dimension of 224' x 194'. A 6' tall chain-link fence with site obscuring slats will form the cultivation area perimeter enclosure.

The following improvements are proposed for the SSR cannabis cultivation facilities:

- A single story 40' x 100' metal frame processing building (12- foot tall walls and 16-foot tall gable height).
- Thirteen (13) – 20' x 98' steel cold frame greenhouses.
- A 20-foot wide center access corridor.
- Ancillary facilities and storage areas.



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

Five parking spaces will be provided just outside the fenced area, including four standard parking spaces and one handicapped accessible parking space, with two additional standard parking spaces to be available inside the gate.

Employees parking outside the perimeter fence will access the cultivation facilities enclosure through the keypad controlled, 12-foot wide chain-link gate or the 4-foot wide pedestrian gate.

The processing building is located at the front of the 1-acre site and will have a large roll up door for loading and a pedestrian door for building access. The floor plan for the processing building is included in the project site plan package. The building will feature a drying room, secure storage rooms, trimming area, break room, restroom, and office.

A 20' wide center access road will extend down the center of the cultivation site and provide both vehicular and worker access to the thirteen 20' x 98' greenhouses that will be placed perpendicular to the access aisle.

Each of the thirteen greenhouses will be laid out in the same way and will all function in a similar manner. The greenhouses will be cold steel frame arched style structures with solid panel end walls and a movable cover system. Access to both ends of the greenhouses will lead directly to the center walkway and ground level planting beds (9' x 94') situated on both sides. Each greenhouse will support 1,692 square feet of cultivation area and the total cultivation area will total 21,996 square feet.

Lighting, ventilation, odor mitigation and irrigation facilities will be provided for in the cultivation process.

Sunny S Ranch Property Management Plan

Introduction

A Property Management Plan is required by Lake County pursuant to County Ordinance #3073 for all minor and major use permits for the commercial cultivation of cannabis.

According to the County Ordinance, the intent of the Property Management Plan is to identify and locate all existing cannabis and non-cannabis related uses on the property and describe how all cannabis and non-cannabis related uses will be managed in the future.

The Property Management Plan must 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.

Lake County requires that the Property Management Plan to include the following sections:

1. Air Quality
2. Cultural Resources
3. Energy Usage
4. Fertilizer Usage
5. Fish and Wildlife Protection
6. Operations Manual
7. Pest Management
8. Security
9. Storm water Management
10. Waste Management
11. Water Resources
12. Water Use

The Property Management Plan standards as set forth in Lake County Ordinance #3073 are attached as Appendix 1.

Air Quality

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

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

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

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

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

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

LCAQMD Permits

The Sunny S Ranch cultivation operation is not expected to generate significant quantities of air pollutants.

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

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

Dust Management Measures

Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. The following are some of the mitigation measures and Best Management Practices (BMPs) that will be used to control dust: staff will be informed of speed limits and dust pollution; the roadways may be clearly marked for limited speed to control dust; dusty road segments can be armored with gravel or asphalt; and a road maintenance program can be implemented if necessary. Other dust management practices include: on tilled earth and stockpiles, fugitive dust can be controlled by wetting the soil with a mobile water tank and hose, or by delaying ground disturbing

activities until site conditions are not windy; water applications may be concentrated during the late summer and early fall months, when soils have the lowest moisture content or when winds are severe. Other dust management BMPs will be employed as necessary:

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

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

BMP Fact Sheets related to dust control are attached.

Cannabis Cultivation Odor Management

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

The Sunny S Ranch cultivation facility will be located near the center of a 20-acre parcel and will conform to the Lake County Ordinance #3073 setback requirements, which were designed to put substantial linear distances between grow sites and neighboring residences. Nuisance odors are effectively mitigated and reduced over long distances. The location of the cannabis cultivation facilities (more than 100 feet from property lines) is the project's primary odor management approach.

Charcoal filtration systems can be an effective odor neutralizer for indoor and mixed light cultivation facilities. Charcoal filters will be installed in each greenhouse. Inside air from the cultivation areas will be mechanically pushed out (expelled) by fans from the greenhouses through the charcoal filters minimizing potential nuisance odors from escaping the structure.

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

Contingency Measure: If appropriate and if a verified odor complaint is received there will be portable high-capacity fans available for on-site for operation to direct airflow/cannabis odors away from the impacted area.

Although not initially proposed, an additional odor mitigation approach utilizing an ozone generator, could be installed on the outside of the exhaust fans. Should additional odor mitigation be necessary, this state of the art atomizing system could be installed on the exhaust fans to bind with the cannabis terpene compounds and minimize nuisance odors.

Odor Response Program

Sunny S Ranch Management Staff responsible for responding to odor complaints - 24 hours per day/seven (7) days a week, including holidays include:

Name	Title	Cell Phone	Email Address
Knute Jackson	Cultivation Manager	415-715-4309	knutejackson@hotmail.com
Nick Nochera	Cultivation Manager	707-223-1314	nnochera@yahoo.com
Shannon Sanders	Owner	415-717-8953	allnovato@gmail.com
Denise Scoles	Administrative Manager	415-827-4152	allnovato @g.mail.com

Property owners and residents of property within a 1,000' radius of the Sunny S Ranch cannabis facility, will be provided with the contact information of the individuals responsible for responding to odor complaints.

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

Sunny S Ranch Cultivation Facility Odor Complaint Protocol

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

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

A. Time and date of complaint, and how it was received.
B. Name of employee who has received complaint.
C. Weather conditions at time of complaint, including prevailing wind direction.
D. Specific nature of the odor complaint i.e. what does the complaint involve - strong odor, weak odor, intermittent odor, continuous odor, and other details, including a description of the type of odor (what does it smell like?).
E. Name, address, phone number, of the complainant, including their location and estimated distance from Sunny S Ranch facilities.
F. Action taken at the time of complaint including the name of the Manager that the complaint has been referred to and the results of any initial investigation that may have been conducted.
G. Investigation of complaint – Sunny S Ranch Management staff will investigate the complaint within 24 hours and determine the validity of it, including a determination as to any equipment or mechanical failures or issues, loss of power, operational issues, and or any other causes for the odor problem.
H. Report on odor complaint – the responsible Sunny S Ranch Manager will issue a report on the complaint, file it in the complaint log book, and contact the complainant within five working days to report the reasons for the odor issues and the mitigation measures employed to respond to the odors.
I. The Sunny S Ranch Management staff will review all odor complaints, responses and actions on a monthly basis and take follow up remedial actions as needed to reduce potential nuisance odor issues.

Cultural Resources

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

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

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

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

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

> *"Existing cultivation activities themselves would generally have limited potential for adverse impacts on cultural resources. However, cultivation may involve excavation within soil that has not been disturbed previously. As such, while considered unlikely, excavation could encounter buried historic or archaeological resources or human remains. A mitigation measure—CR-1—was added that would ensure that any unexpected discoveries of cultural resources during cultivation do not result in significant impacts.*
>
> *It is also considered unlikely that cultivation itself would result in modification or demolition of historic structures that could affect the characteristics that make the building eligible for listing in the CRHR; such impacts would be more likely to occur as part of site development and, as a result, would be evaluated by the local agency during its approval process for site development. In addition, the CalCannabis Licensing Program's environmental protection measures related to cultural resources, specifically the accidental discovery of human remains (Section 8313[c] of the proposed regulations), would require applicants to halt cultivation activities and implement Health and Safety Code Section 7050.5 if human remains were discovered……".*

Sunny S Ranch Inadvertent Cultural Resources Discovery Protocol

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

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

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

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

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

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

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

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

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

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

Energy Usage

Intent: Minimize energy usage.

The Sunny S Ranch parcel has an existing electrical power service provided by PG&E. The mixed light cultivation project will be conducted within greenhouses and is an efficient solar energy system that will reduce total overall energy consumption. Three-phase power (480-volt) will be routed to the greenhouse.

PG&E has been consulted and indicates that two or three overhead poles will need to be installed on the parcel to serve the proposed cultivation site area.

This cultivation operation involves several greenhouse structures using mixed-light. Lighting within the greenhouses will be used when weather prevents sufficient sunlight, or for short durations in the winter to control the photosynthesis period.

One of the 20’ x 98’’ greenhouses will be utilized for cultivation of non-flowering immature plants and may require up to 16 hours of sunlight and artificial light. The remaining greenhouses will contain mature plants, which may require up to four hours a day of artificial light during overcast periods; this the longest duration of artificial lighting use anticipated.

Ten (10) 1,000-watt fixtures will be installed within the grow areas of the greenhouse structure (approximately 11 watts per square foot).

The site is currently provided with power that serves a water well located in the rear third of the parcel.

A 500-gallon propane tank serves as the heating fuel source for the existing house. One additional 500-gallon propane tank is proposed for greenhouse and processing operations.

Lake County requires the provision of energy calculation as mandated by the California Building Code. All new buildings, alterations, additions and commercial buildings in California must comply with the Building Energy Efficiency Standards according to Title 24, Part 6 of California Code of Regulation. Sunny S Ranch energy compliance documentation will be developed and submitted to the Lake County Community Development Department - Building Division for plan check.

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

A combination of the following energy conservation measures will be employed for the Sunny S Ranch cultivation operation:

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

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

Solar energy utilization through standard greenhouse cultivation is considered an alternative energy source and will account for 50-70% of the total energy usage.

Under California law, mixed light cultivation is not considered to be an indoor cannabis cultivation.

Fertilizer Usage

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

To comply with the Fertilizer Usage guidelines, Sunny S Ranch will implement the following:

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

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

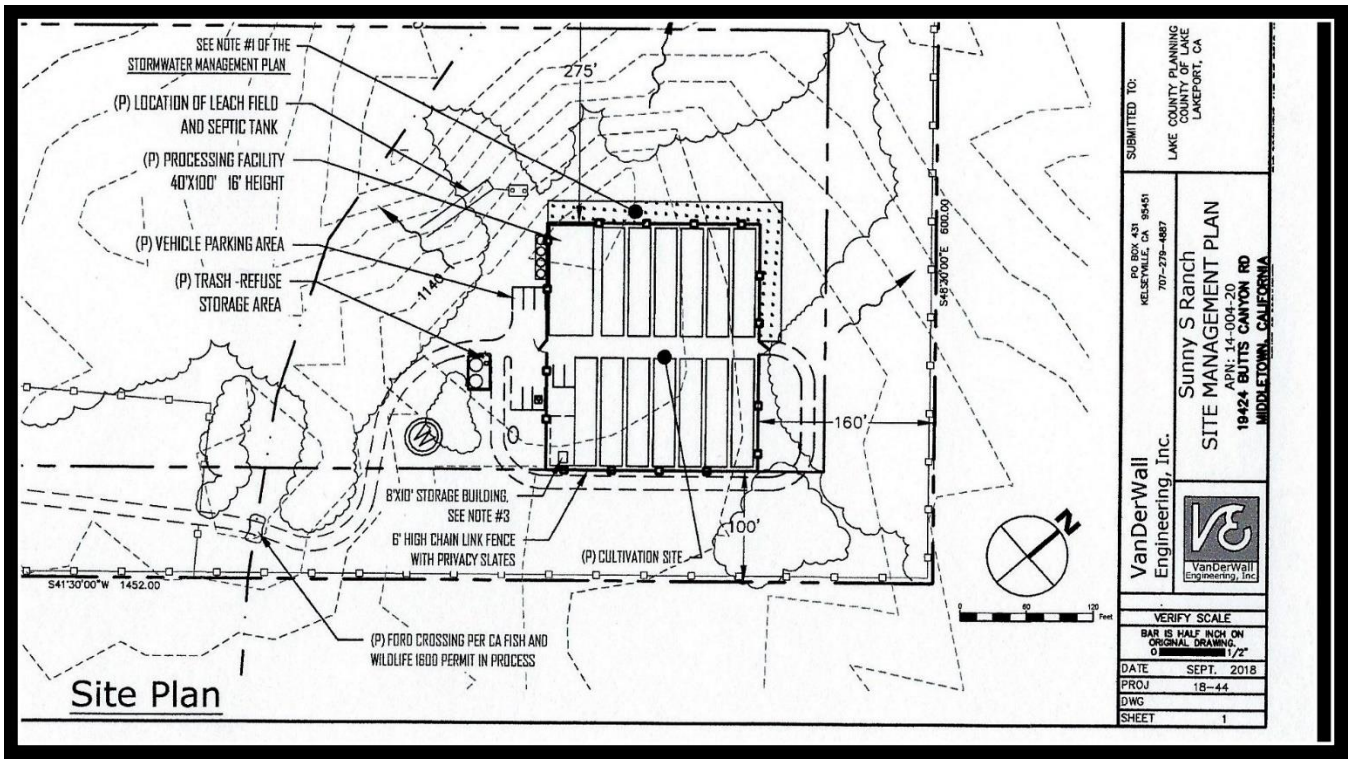
- Sunny S Ranch personnel will be trained in accordance with California Department of Pesticide Regulations (CADPR) on how to read labels and SDSs prior to any product application and will comply with all label directions;
- Pesticides will be stored above ground level in a properly marked (Danger: Pesticides)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

Sunny S Ranch will likely consult with a certified professional to assist with these activities:

Monitoring Program

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

The following map shows the location of the 8’ x 10’ secure fertilizer storage building and chemical storage area. The secure and weather proof storage building is within the cultivation fence area, opposite of the processing building.



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

Fish and Wildlife Protection

Intent: Minimize adverse impacts on fish and wildlife.

The proposed Sunny S Ranch cultivation site is located within the North Coast Range sub region in Northwestern California. This area has a Mediterranean type climate, characterized by distinct seasons of hot, dry summers and wet, moderately-cold winters.

The parcel is in the USDA Plant Hardiness Zone 9a and the Sunset Western Garden Book Climate Zone 7. This area is in a transition zone of California's Gray Pine Belt and the Western Central Valley. High summer heat accumulations, high heat intensities, more than 95% of possible sunshine in midsummer, long growing seasons averaging around 270 days per year characterize this climate.

Vegetation community types that are present on the parcel include the ghost pine and oak woodland forest, agricultural, and ruderal/developed. The parcel contains grass lands but also has mixed deciduous and coniferous forest characteristics.

Species composition for this site consists largely of Quercus douglasii and Pinus sabiniana with a considerably lesser amount of other Quercus, Salix, and Ceanothus specimens.

The subject site includes scattered oaks and pines occurring on the west- facing slopes on the north side of the property. The canopy is sufficiently open to provide for a moderately dense shrub layer consisting of common manzanita (Arctostaphylos manzanita ssp. manzanita), and some chemise (Adenostoma fasciculatum). Ground cover includes a number of grasses including red brome.

Agricultural areas consist of dry pasture and fallow fields. Vegetation within this habitat type consists primarily of bare areas or European pasture grasses and weeds.

Ruderal/Developed areas consist of disturbed or converted natural habitat that are now either in a ruderal (constantly disturbed) state, or urbanized with gravel roads, or structure and utility placement. These areas include roads and parking areas, residences, and outbuildings. Vegetation within this habitat type consists primarily of nonnative ornamental plants or invasive species lacking a consistent community structure.

The only wildlife habitats present on parcel are: agricultural; grassland; barren; and urbanized. The operational areas are not within any designated listed species' critical habitat. The non-native grassland, agricultural, and urbanized habitats have a low potential for harboring special-status species due to the dominance of aggressive non-native grasses and forbs and disturbance from human activities. The parcel does not have the potential to sustain aquatic special-status species. No impacts to special-status species were identified from project implementation.

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

The California Natural Diversity Database was queried for any reported occurrences of special-status species in relation to the cultivation area. The CNDDB reported no special-status habitats or special-status species within the boundaries of the parcel or within a 10-mile buffer around the parcel.

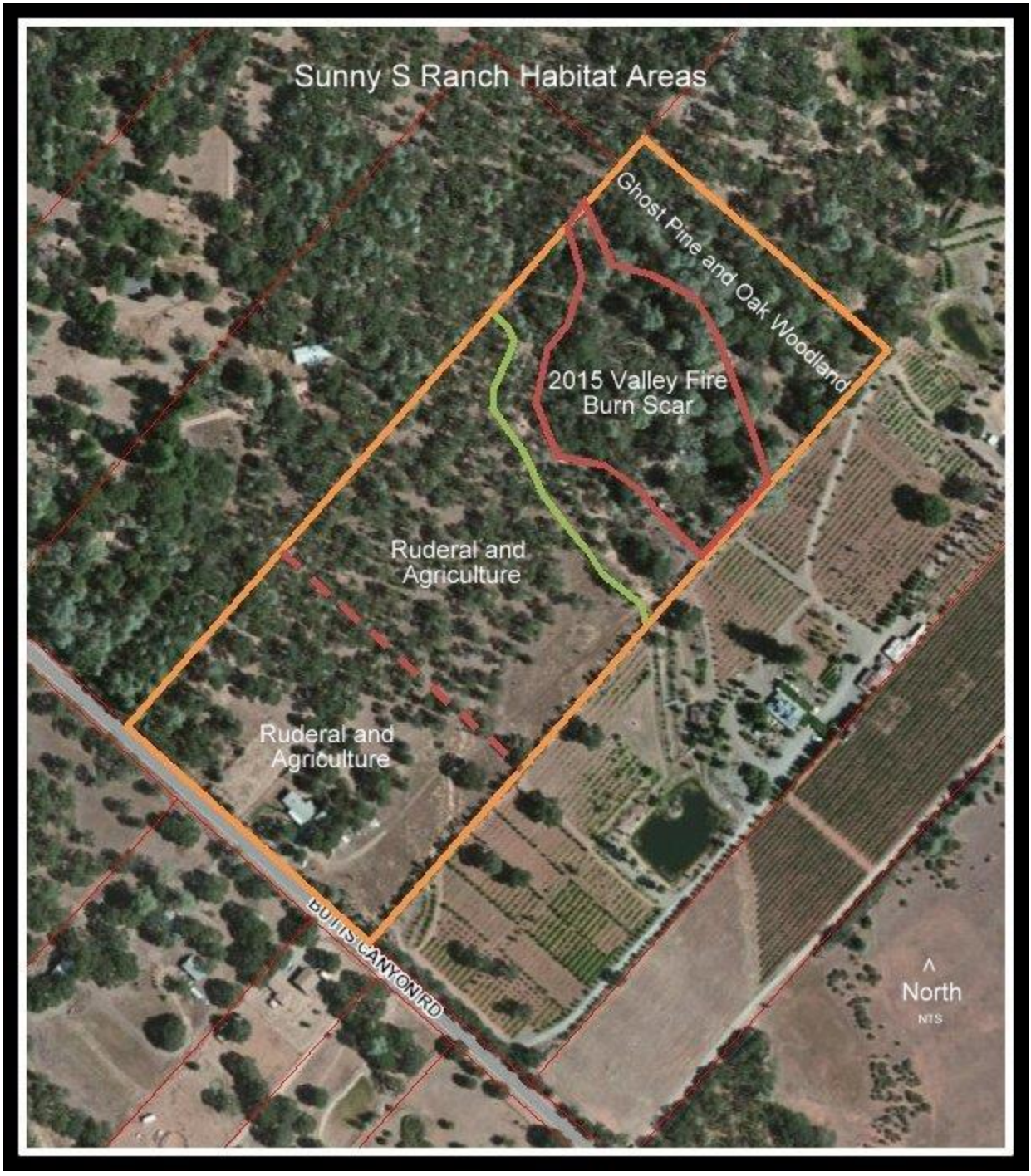
The cultivation site is located in the Long Valley area north east of Middletown, on a flat northeast-southwest trending slope. Drainage from the cultivation site area runs to an unnamed swale to the north. This intermittent channel eventually flows west to St. Helena Creek and Dry Creek.

Elevations at the cultivation site are relatively flat at about 1,140 feet above mean sea level (MSL).

Soils at the cultivation project site are comprised of two soil types that include Manzanita Loam on 2-5 % slopes and Bressa Millsholn Loam located on 5-15% slopes. The steepest slope on the subject property is approximately 10% according to available topographic data. Most of the site, particularly the proposed cultivation area, is relatively flat.

An on-site survey of the cultivation site vegetation and other nearby cover types found that it has been heavily impacted by a wild land fire (Valley Fire 2015). Trees in the cultivation site area were burned and have been cut down. The dead trees will be cut up and removed and the stumps will be ground down. The 20-acre parcel is occupied by a single-family dwelling, garage and storage building and much of the property has been used for horse and livestock pasture.

The following is an aerial photo image of the biological habitats found on the lot of record.



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

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

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

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

Operations Manual

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

County Authorization

Sunny S Ranch will provide authorization for the County, its agents, and employees, to verify the information contained within the use permit application, the Operations Manual and Operating Standards, before or after the issuance of development or use permits.

Staff Screening Processes

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

Sunny S Ranch will conduct in-person interviews and require each applicant to provide a comprehensive resume and contact information for all references.

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

Operating Times and Personnel Needs

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

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

The SSR cultivation facility may employ up to 10 people, with the following positions:

- 1 lead grower/cultivation facilities manager
- 2 associate growers or technicians
- 6 or 7 seasonal trimmers/laborers

The SSR cultivation facility will be closed to the public. Visitation is only allowed when specific permission is granted. Individual Management staff identified as emergency contacts will stay on site in the existing residence.

Carbon Footprint Offsets

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

- Use of energy-saving measures (see Energy Usage subsection)
- Use of water-saving measures (see Water Use subsection)
- Implementation of solid waste reduction measures (see Waste Management subsection)
- Implementation of air emissions reduction measures (see Air Quality Management subsection)
- Application of standard project design, site selection, minimal site grading and disturbance

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

Chemical Storage and Use

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

Site Maintenance

The Sunny S Ranch will implement a variety of procedures to ensure that the grounds are kept in a condition that prevents the contamination of components and cannabis products and ensure that good housekeeping activities are used:

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

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

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

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

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

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

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

Cultivation Cycle Summary

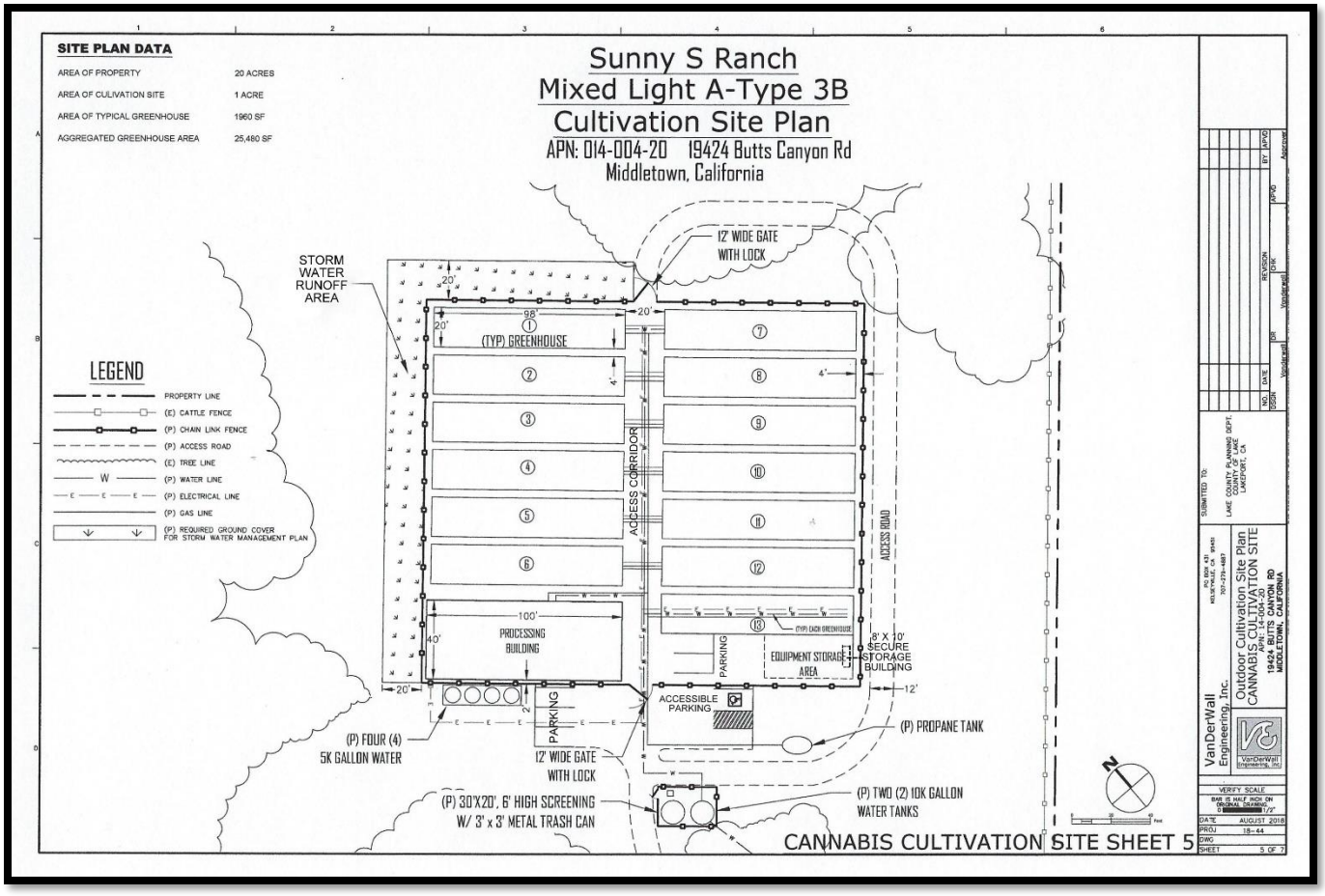
The cannabis plant cultivation cycle starts with clones from the mother plants. This process involves grafting of cuttings from the mother plants, dipping in rooting powder and propagation until roots are established.

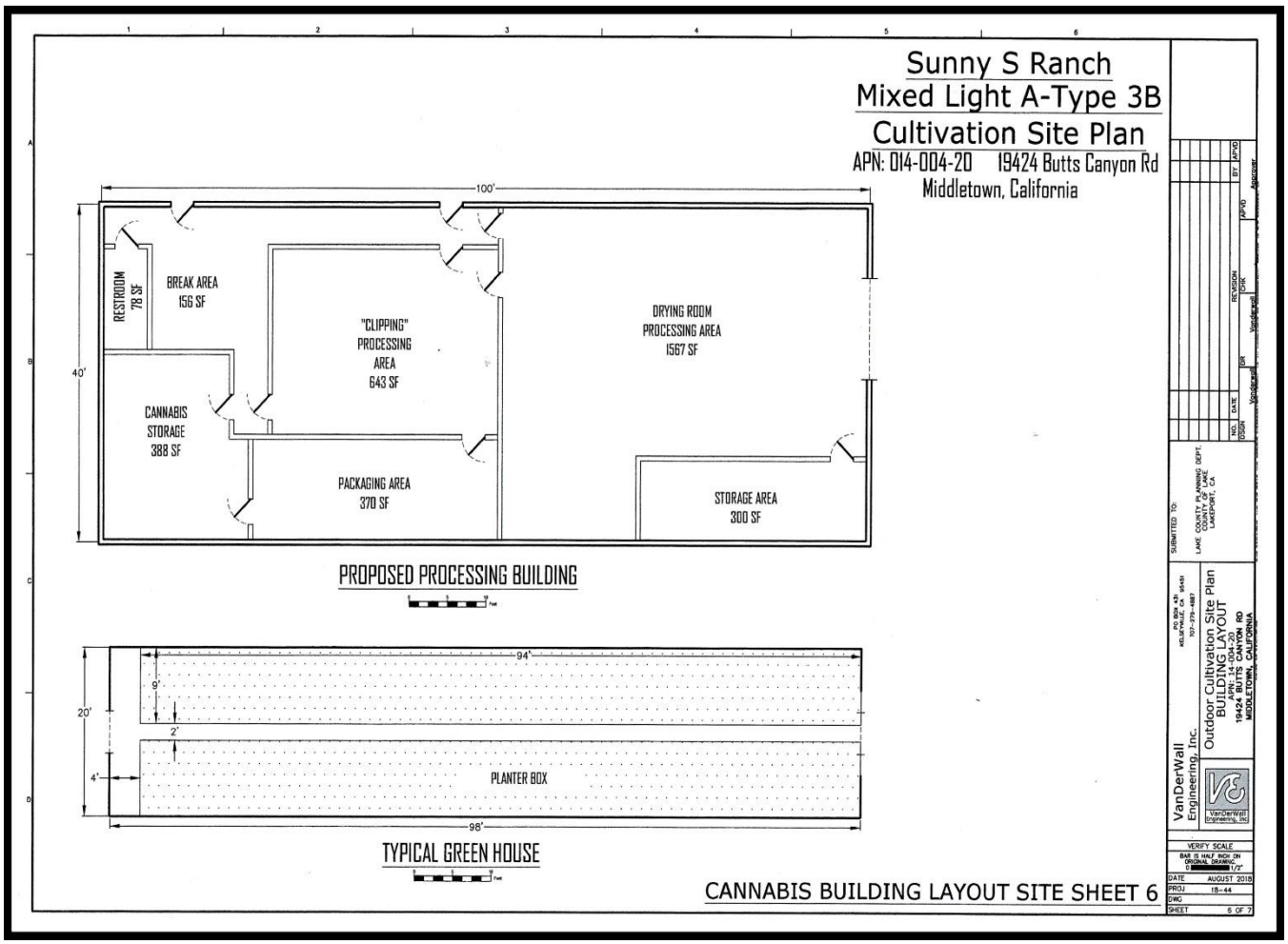
Once rooted, the plants are moved to the vegetation greenhouse, where they will spend two weeks.

The juvenile cannabis plants are then moved to the main greenhouses, where they mature and flower over a 7-8 week period, after which they are harvested.

After they are harvested and spend 10 to 14 days in the drying room, cannabis flowers are trimmed, prepared and packaged, stored in the safe room and readied for pick up and transport to market or for additional processing and manufacturing at separate off-site facilities.

The following are illustrative site plan and floor plan details for the Sunny S Ranch cultivation project.





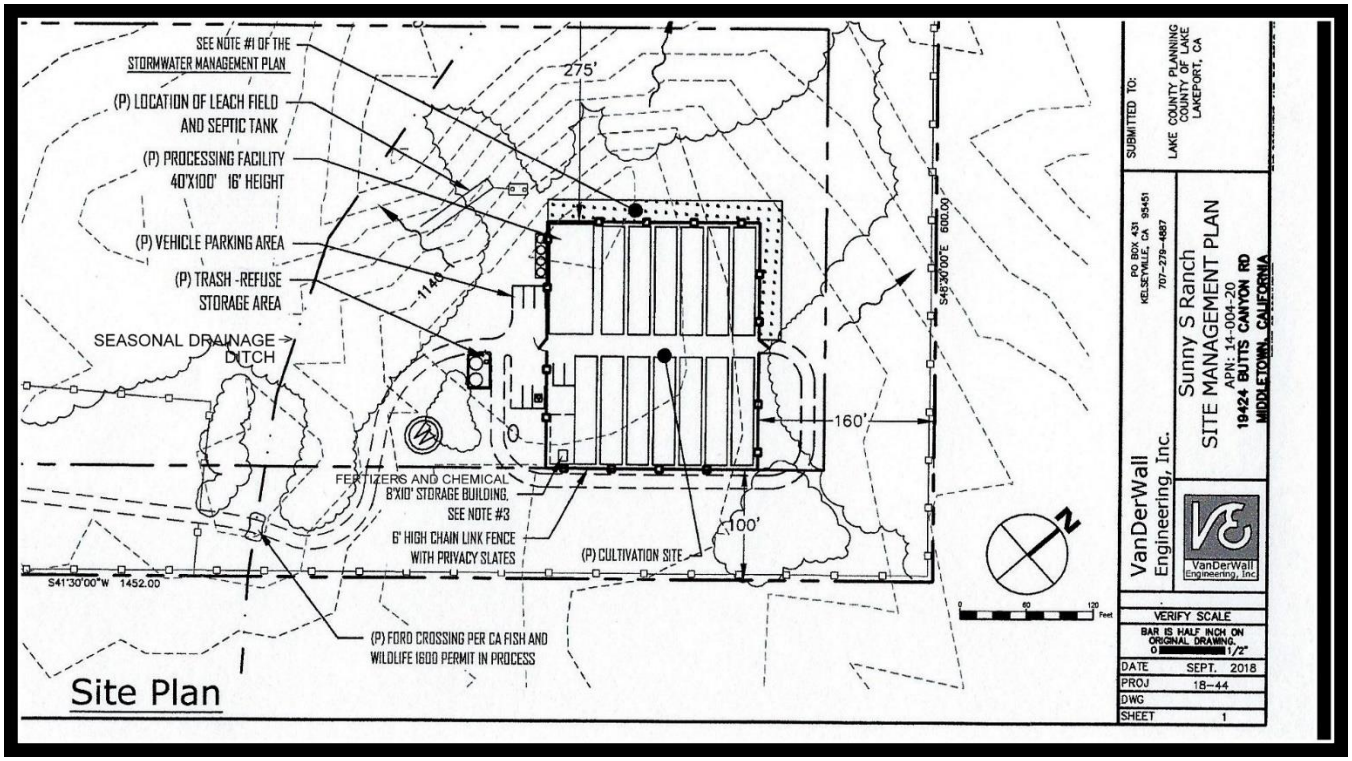
Pest Management

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

Sunny S Ranch will comply with all adopted pesticide application and storage protocols by employing the following practices:

- SSR cultivation operations will comply with the California Food and Agriculture Code, Division 6 Pest Control Operations and Division 7 Agriculture Chemical; Chapter 1 - 3.6 and California Code of Regulations, Division 6 Pest Control Operations.
- All pesticide label directions will be followed and adhered to.
- Any chemicals used in the operation of the SSR cultivation facilities, including cleaning supplies, will be stored in a secure building or shed to prevent unauthorized access by wildlife or humans.
- All chemical leaks will be contained within the secure storage room and any spills will be immediately cleaned up.
- Sunny S Ranch staff will utilize the minimal amount of chemicals as directed which will minimize off site drift. The centralized location of the 1-acre site allows for substantial setbacks from adjoining parcels which will prevent offsite drift.

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



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

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

At the SSR cultivation operation, pests will be controlled by employing only approved, organic-certified pesticides. Weed control will not be necessary as plants will be grown in an enclosed greenhouse; herbicides will not be used. Live traps will be used for rodent control.

The CA Department of Pesticide Regulation lists allowable pesticides in their publication "Legal Pest Management Practices for Marijuana Growers in California." Table 3 (Pest Management Practices For Marijuana Grown Indoors) is attached.

Pesticide Application and Storage Protocols

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

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

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

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

- Comply with all pesticide label directions;
- Store chemicals in a secure building or shed to prevent access by wildlife;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary to control the target pest;
- Prevent offsite drift;
- Do not apply pesticides when pollinators are present;
- Do not allow drift to flowering plants attractive to pollinators;
- Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

- Do not apply pesticides when they may reach surface water or groundwater; and
- Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

Pesticides will be used according to the instructions on the label or the Safety Data Sheets (SDS). County regulations also apply to listed pesticides. Pesticides will be stored in the detached storage shed or in a locked secure room within the processing building. Chemicals will be properly labeled and open containers sealed when stored. When handling chemicals, staff will use personal protective equipment such as safety glasses, gloves, dust mask or respirator, boots, pants and long-sleeved shirt. Pesticides will not be applied on windy days or within 24-hours of a forecasted rain event.

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

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

Sunny S Ranch – Table of Fertilizers and Pesticides

	Fertilizers	Pesticides	Herbicides	Rodenticides
Products to be used at the site.	1.chicken manure 2.soluable sea weed 3.bat guano 4.hygrozyme 5.thermex 6.epsome salt 7.presipitated bone meal 8.dolomite	1.liquid plant therapy 2.sulphur 3.Dr. Zyme	1.None	1.None
When are they delivered to the site.	Weekly or as needed	Weekly or as needed		
How are they to be stored at the site.	In their product containers, on shelving within a locked watertight shed.	In their product containers, on shelving within a locked watertight shed.		
How are they used.	In accordance with product directions. Applied via portable trailer tank.	In accordance with product directions. Applied via portable applicator.		
How are they going to be removed from the site or stored over the winter to prevent discharge or leaks.	Stored in shed. Transported away from site in trailer tank.	Stored in shed. Transported away from site in a closed truck bed.		

Security

Intent: To minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The Applicant shall provide adequate security on the premises, as approved by the Sheriff and pursuant to this section, including lighting and alarms, to ensure the safety of persons and to protect the premises from theft.

Unauthorized Access and Employee Safety

Access to the Sunny S Ranch cultivation site by the public or unauthorized personnel is prohibited. The protection of and the physical safety of employees is one of the top priorities for Sunny S Ranch.

The cultivation operation will be accessed by a private gravel driveway extending in about 1000 feet from Butts Canyon Road to the cultivation site. The driveway will lead to a parking area outside a 6-foot high, heavy gage chain link security fence and gate with a keypad entry surrounding the greenhouse area. The greenhouses and processing building will be located within the secure fenced enclosure.

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

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

The Sunny S Ranch currently has several pasture fences and cross fencing in place for animal control purposes. Pasture fences and gates will remain in place and provide an additional layer of security.

The establishment of a physical barrier to secure perimeter access to the 1-acre cultivation area is required by the County and will be provided. A 6’ tall chain link fence will be constructed around the perimeter of the cultivation area a commercial-grade key pad access lock will be provided at the front entry gate. These measures constitute the primary access restriction.

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

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

As indicated on Site Plans 7A and 7B, the premises will be outfitted with security cameras and security lighting and maintained in such a way that visibility and security monitoring of the premises is practical and effective.

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

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

Theft Prevention and Loss Control

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

- Sections 8401 through 8405 of the Licensing law requires that the CalCannabis Department shall establish a track-and-trace system for unique identifiers of cannabis and nonmanufactured cannabis products, which all licensees shall use.
- Each licensee shall report in the track-and-trace system the disposition of immature and mature plants, as required by Section 8402 of this Chapter, and nonmanufactured cannabis products on the licensed premises and any transfers associated with commercial cannabis activity between licensees.
- The licensee is responsible for the accuracy and completeness of all data and information entered into the track-and- trace system.
- Data entered into the track-and-trace system is assumed to be accurate and can be used to take enforcement action against the licensee if not corrected.
- Attempts to falsify or misrepresent data or information entered into the track-and-trace system is a violation and subject to enforcement.
- Establishment of an account in the track-and-trace system prior to engaging in any commercial cannabis activities associated with their license and maintain an active account while licensed.
- The Sunny S Ranch Track-And-Trace System Administrators are:
  - Knute Jackson - Project Manager
  - Nick Nochera – Project Manager
  - Shannon Sanders - Owner
- Sunny S Ranch personnel will be granted access within the cultivation site to only those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties.
- There will be supervision of tasks or processes with a high potential for diversion (including the loading and unloading of cannabis transportation vehicles. Supervision will include video surveillance and/or the requirement that the Security Officer or their designee to be present.
- Diversion or theft of cannabis will not be tolerated at the Sunny S Ranch and will be reported to the Lake County Sheriff.
- Sunny S Ranch personnel will be subject to task or processes monitoring and supervision particularly in those area with a high potential for diversion (including within the greenhouses, the processing building, and in areas where the loading and unloading of cannabis transportation vehicles occurs).
- Sunny S Ranch will designate an area within lockers in the processing building and within the SFD at the front of the parcel where personnel may store and access personal items.

Emergency Contacts

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

Name	Email	Phone	Mailing Address
Shannon Sanders *Security Officer*	allnovato@gmail.com novachron01@aol.com	415-717-8953	19424 Butts Canyon Road Middletown, California 95461
Denise Scoles *Security Officer*	allnovato@gmail.com	415-827-4152	19424 Butts Canyon Road Middletown, California 95461
Knute Jackson	knutejackson@hotmail.com	415-715-4309	19424 Butts Canyon Road Middletown, California 95461
Nick Nochera	nnochera@yahoo.com	707-223-1314	19424 Butts Canyon Road Middletown, California 95461

Sunny S Ranch encourages neighborhood residents to call the following persons to resolve operating problems, if any, before any calls or complaints are made to the County.

Shannon Sanders	allnovato@gmail.com novachron01@aol.com	415-717-8953	19424 Butts Canyon Road Middletown, California 95461
Denise Scoles	allnovato@gmail.com	415-827-4152	19424 Butts Canyon Road Middletown, California 95461

The Sunny S Ranch will maintain a Log Book of and procedures for receiving complaints, responding to the complaints, maintaining records of all complaints and resolution of complaints, and providing a tally and summary of issues in the annual Performance Review Report.

SUNNY S RANCH OPERATIONS LOG BOOK

NATURE OF COMPLAINT	DATE AND TIME RECEIVED	RESPONSE TO COMPLAINT AND REFERRAL OF COMPLAINT	RESOLUTION

Video Surveillance

The Sunny S Ranch premises will be provided with a complete digital video surveillance system with a minimum camera resolution of 1280 x 720.

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

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

- The perimeter of the cannabis cultivation site.

- Areas inside of and outside of the Processing Building where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and unloaded for transportation, prepared, or moved within the premises.
- Areas where cannabis vegetative matter is destroyed.
- Limited-access areas including storage and secure rooms.
- Areas containing surveillance-system computer and monitoring devices, in which case, at least one camera will record the access points to such an area.
- The interior and exterior of all entrances and exits to the cannabis cultivation sites.

The digital surveillance system will also include the following features:

- Operate continuously 24 hours per day and at a minimum of 30 frames per second.
- All exterior cameras will be waterproof, I-66 minimum.
- All interior cameras will be moisture proof.
- Cameras will be color capable.
- Video management software will be capable of integrating cameras with door alarms.
- Video recordings will be digital.
- Thermal/infrared technology will be used for perimeter fencing and areas with inadequate lighting.
- All cameras will include motion sensors that activates the camera when motion is detected.
- All recording data will be stored in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located.
- All surveillance recordings will be kept on the applicant's recording device or other approved location for a minimum of 30 days.
- All video surveillance recordings are subject to inspection by the County and will be copied and sent, or otherwise provided, upon request.
- The video recordings will display the current date and time of recorded events.
- Time is to be measured in accordance with the U.S. National Institute Standards and Technology standards.
- The displayed date and time will not significantly obstruct the view of recorded images.
- To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.
- The video management software will be capable of integrating cameras with door alarms.
- All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.
- Data transfer will be by coax cable or by Wi-Fi router.
- Power supplies shall be self-contained, solar arrays and batteries.

Required Fencing

The 1-acre cultivation site will be provided with fencing as required by the County. The proposed fencing will include, at a minimum, the following:

- The entire cultivation site will be enclosed with a sturdy chain link fence.
- Fence panels will consist of metal mesh "cyclone" fabric or welded wire mesh.
- Steel tubing, timber, or concrete posts driven into the ground or set in concrete.

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

Security Measures

- General security measures at the Sunny S Ranch cultivation site will include the following:
- Preparation and maintenance of a comprehensive site and facility security plan updated as needed;
- Employee screening protocol and hiring criteria;
- Implementation of personnel rules and responsibilities (to be incorporated into an employee handbook in the future);
- Staff training;
- Construction of physical barriers, including signage, road gates, security fencing with locked gates, and commercial-grade locks on all interior doors, card lock system;
- Installation and maintenance of an alarm system that can notify security personnel and record incidents where physical barriers have been breached;
- Implementation of a theft and loss control program;
- Operation and maintenance of a video surveillance system.
-

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

Shannon Sanders	allnovato@gmail.com novachron01@aol.com	415-717-8953	19424 Butts Canyon Road Middletown, California 95461
Denise Scoles	allnovato@gmail.com	415-827-4152	19424 Butts Canyon Road Middletown, California 95461
Knute Jackson and Nick Nochera _ Project Managers	knutejackson@hotmail.com nnochera@yahoo.com	415-715-4309 707-223-1314	19424 Butts Canyon Road Middletown, California 95461

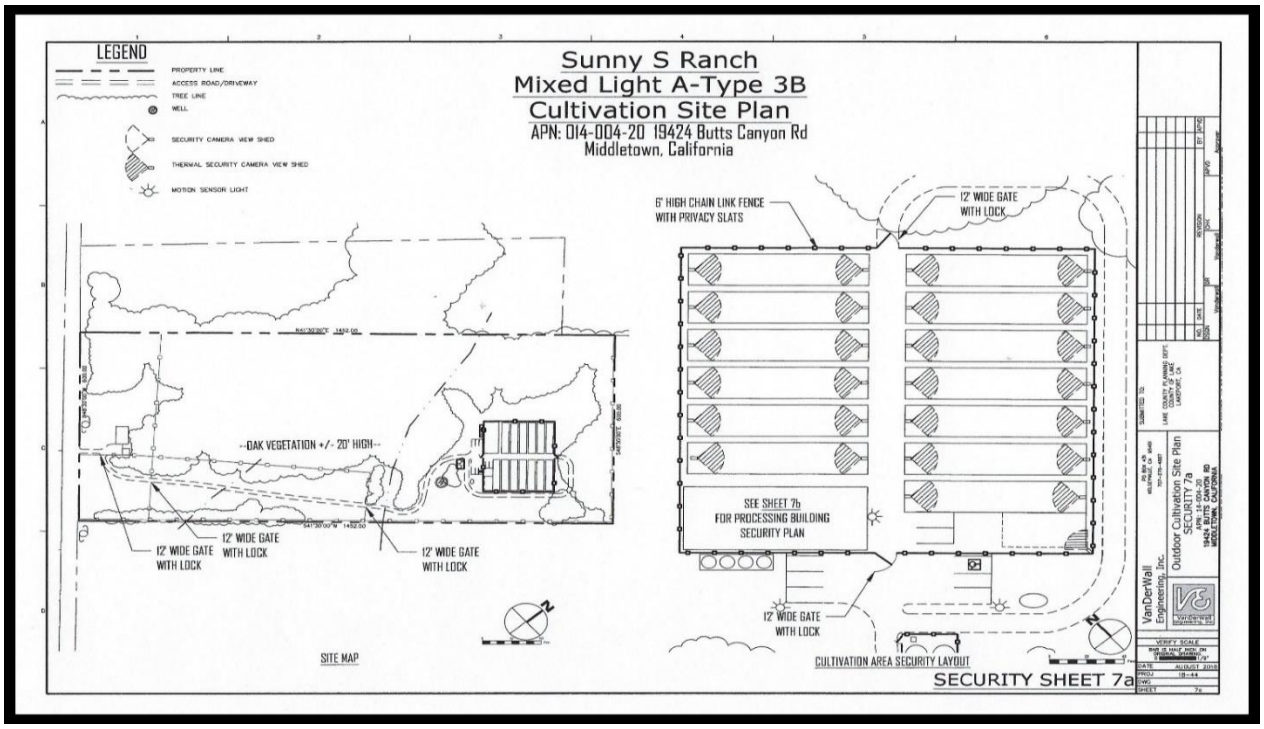
The Sunny S Ranch Security protocol will require that Security Officers maintain a record of all incidents and problems, and details concerning the resolution of complaints, and provide a monthly report thereof. A summary of the complaints, incidents, or problems will be included in the annual Performance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

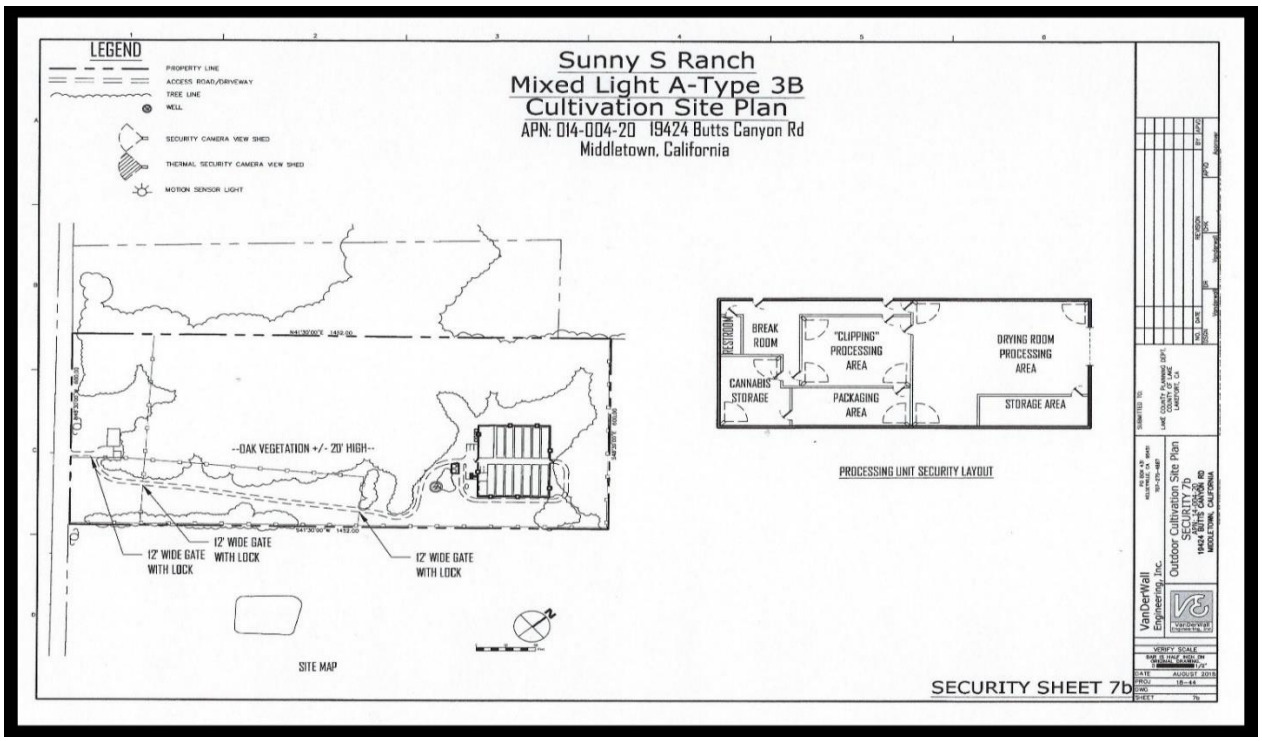
Sunny S Ranch will operate with the following basic personnel rules and responsibilities:

- Obey the rules of the Security Plan.
- Sign in when entering the facility and sign out when exiting the facility.
- Do not carry any weapons.
- Do not engage in lengthy conversation with the public or respond directly to complaints: direct all such concerns to the Security Officer.
- Only authorized vehicles are allowed in operational areas.

- Do not bring backpacks or other unnecessary storage devices that might complicate the theft control program.
- Lockers will be provided for personal items.
- Do not enter restricted areas unless authorized to do so.

Sunny S Ranch Security Site Plan Sheets 7A and 7B:





Storm Water Management

Intent: To protect the water quality of the surface water and the stormwater management systems managed by Lake County and to evaluate the impact on downstream property owners.

Sunny S Ranch Site Plan # 5 - Cultivation Site Plan provides detail regarding the proposed plans for the 1-acre fenced grow site and adjacent area and includes a graphic representation of how storm water runoff will be managed to protect downstream receiving water bodies from water quality degradation.

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

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

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

Sunny S Ranch will comply with all orders, regulations, and procedures of the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board, as appropriate.

In August of 2018, a *Site Management Plan* as required by the Central Valley Regional Water Quality Control Board was submitted to the Redding Office as required pursuant to the California Central Valley Regional Water Quality Control Board -Attachment D Technical Report Guidance Order WQ 2017-0023-DWQ. This CVRWQCB - *Site Management Plan* is attached.

Greenhouses will support all cultivation activities and any topsoil, pesticide or fertilizers used for the cultivation of cannabis will be located at least 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

Storm water runoff from the 1-acre cultivation site will be managed in essentially three key ways. First, storm water runoff from the processing building roof will be directed to a standard gutter system at the eaves, and then plumbed to a rainwater catchment system and four water storage tanks located just outside the main gate. This rainwater will be used for both a fire protection sprinkler system and as a possible secondary irrigation source if needed. Second, the surface of the 1-acre fenced cultivation area will be a semi-pervious material that will allow some absorption of rainwater. Third, any surplus storm water that runs off the site will be directed to a vegetated surface water run off - drainage area using the natural ground contours to an area to the northwest of the cultivation fenced area. SSR will not generate any illicit discharges of irrigation or storm water from the premises, as defined in Title 40 of the Code of Federal Regulations, Section 122.26, which could result in degradation of water quality of any water body.

Setbacks and Buffers: County regulations require all cultivation operations be located at least 100 feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool). The operational area is over 1,300 feet from the nearest waterbody.

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

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

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

The surface water from the 1-acre fenced cultivation area will not discharge into a Lake County maintained drainage or conveyance system. There are no public roads and bridges downstream of the onsite discharge area.

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

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

The Central Valley Regional Water Quality Control Board requires a Site Management Plan to be prepared and submitted in conjunction with the Water Board Permit. The Site Management Plan submitted to the CVRWQCB in August 2018 is attached and serves as the Storm Water Management Plan for all storm water BMPs to be incorporated into the project's development and operations. Planned BMPs address erosion and sediment control; materials and waste management activities; general site clean-up; vehicle and equipment cleaning, fueling and maintenance; spill control; regular site inspections; and post-construction monitoring and maintenance. All BMPs will be maintained through the life of the permit authorizing the cultivation activities.

The proposed grading of the property will be minimal. As indicated on the site topographic map, the 1-acre cultivation site is in an area that is essentially flat with a slight tilt to the northwest. The proposed cultivation area is located on open lands recently burned by the Valley Fire. Because of the flat plateau, and the 2015 wildland fire that went through the area, there is little vegetation on the cultivation site. Downed and burned trees will be cut up and removed, and there will be some grubbing of the site to remove any loose surface

materials, fill voids and generally create a level surface. A 2" to 4" layer of road base rock will be spread over the inside perimeter of the 1-acre cultivation enclosure area.

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

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

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

A copy of this Property Management Plan and the 2018 CVRWQCB *Site Management Plan* will be made available to the Project Managers, Owner, site personnel or contractors engaged in the maintenance or installation of storm water BMPs.

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

Solid Waste Management

Intent: To minimize the generation of waste and dispose of such waste properly, to prevent the release of hazardous waste into the environment, minimize the generation of cannabis vegetative waste and dispose of cannabis vegetative waste properly, and manage growing medium and dispose of growing medium properly.

The Sunny S Ranch will generate a small amount of waste on an annual basis. The estimated peak waste generation in pounds per day:

- Paper: 3 lbs.
- Glass: 10 lbs.
- Metal: 10 lbs.
- Electronics: 1 lb.
- Plastic: 10 lbs.
- Organics: 250 lbs.
- Household hazardous waste: 5 lbs.

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

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

• Provide filtered water and dedicated cups instead of bottled water for staff.

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

Waste Collection, Storage, and Disposal

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

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

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

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

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

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

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

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

Hazardous Waste Management

The Sunny S Ranch Hazard Analysis is for the cultivation, harvest, and curing of cannabis. Cannabis will not be manufactured at this cultivation. If Cannabis is ever manufactured at this facility, the hazard analysis will be expanded and revised.

The CDFA CalCannabis Program indicates that "with adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low. In general, cannabis cultivation would not make intensive use of hazardous materials."

The Sunny S Ranch environmental protection measures will help minimize potential accidental releases of hazardous materials by storing chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. The risk of accidental releases of hazardous materials from lawful cannabis cultivation operations would be lower than many other ongoing activities in the state, including existing unpermitted cannabis cultivation activities.

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

Potential biological hazards for unprocessed cannabis at the Sunny S Ranch facility are microbiological, and specifically, fungal growth. In rare instances, some Cannabis crops can be contaminated with coliforms that derive from soils or improper staff hygiene. Insects and arachnids, such as mites, could also be present on Cannabis product. Outdoor biological hazards include snake bites, insect stings, and weather exposure. No outdoor cultivations operations are proposed.

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

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

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

Basic HazMat safety protocols will include:

- Areas inside the cultivation compound will be graveled to suppress dust and mud. Live traps may be deployed to remove rodents from operational areas.
- Disposable coveralls and other personal protective equipment will be used to increase sanitation levels and reduce vectoring of mites and other pests.
- A clothing changing station area will be provided for employees so that street clothing can be separated from cultivation clothing when necessary.
- The number of Sunny S Ranch workers and visitors inside the cultivation area will be minimized, as mites can travel on clothes. Good ventilation and maximum open sun use can lower humidity levels and discourage fungal growth.

- Chemical contamination of raw product is possible, but unlikely. Regular testing for chemical residues on raw product will be performed. Chemical contamination will be reduced by implementation of Best Management Practices which are set forth in other subsections of this Plan. The use of organic-certified chemicals will also reduce this hazard significantly.
- For Sunny S Ranch cultivation staff, the risk of chemical exposure will be reduced by the use of personal protective equipment and the implementation of Best Management Practices, as identified in other subsections of this Plan, and adherence to all product usage guidelines and recommendations.
- The contamination of raw cannabis product by physical residues is relatively common, but easy to avoid. Facilities will be kept as clean as possible. Disposable coveralls (e.g. Tyvek) may be used to increase sanitation levels. Plastic sheeting will be used when raw product must be handled or stored. Equipment, such as scissors and saws, will be sanitized with ethanol.
- For cultivation staff, the risk of physical hazards will be reduced using personal protective equipment.

Hazardous Waste Management Plan

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

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

Sunny S Ranch staff will use personal protective equipment such as safety glasses, gloves, dust mask, boots, and pants and long-sleeved shirt when handling chemicals.

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

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

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

Cannabis Vegetative Material Waste Management

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

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

Disposal of cannabis green waste will follow procedures established by the State. On-site composting is an option. If off-site disposal is used, all cannabis waste will be rendered unusable and unrecognizable before it leaves the premises by grinding and mixing the green waste with non-consumable solid wastes such that results in a mixture that is at least 50 percent non-cannabis waste.

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

Sources of green waste from the Sunny S Ranch cultivation operation consist of the following:

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

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

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

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

<u>Handling and Disposal of Cannabis Vegetative Waste</u>

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

Cannabis waste will either be composted onsite or disposed of at a licensed landfill offsite after rendering it unconsumable. Non-cannabis green waste will be composted.

If cannabis waste is disposed of offsite, it will be blended with an equal part of non-consumable material, such as waste paper (to render the cannabis unconsumable). Cannabis waste will be kept inside the locked cultivation fenced area or other locked compound until ready for transport. It would then be transported as solid waste to the proper disposal facility (see Solid Waste Management Plan).

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

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

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

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

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

Growing Medium and Disposal

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

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

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

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

§ 8305. Cannabis Waste Management (a) For the purposes of this Chapter, "cannabis waste" is waste that is not hazardous waste as defined in Section 40141 of Public Resources Code, and is solid waste, as defined in Section 40191 of Public Resources Code, that contains cannabis and that has been made unusable and unrecognizable in the manner prescribed in subsection (e). A licensee may not sell cannabis waste. (b) A licensee shall manage all waste that is hazardous waste, as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations. (c) A licensee shall dispose of cannabis waste as identified in the licensee's Cultivation Plan approved by the Department. A licensee shall not dispose of cannabis waste in an unsecured waste receptacle, whether in the control of the licensee or not. (d) Cannabis that a licensee intends to render into cannabis waste shall be held in the designated holding area for a minimum of 72 hours. A licensee shall affix to each batch one or more documents with batch information and weight. At no time during the 72-hour hold period may the cannabis be handled, moved, or rendered into cannabis waste. The cannabis the licensee intends to render into cannabis waste is subject to inspection by the Department. (e) A licensee shall make cannabis into cannabis waste by rendering the cannabis unusable and unrecognizable. The licensee shall render the cannabis into cannabis waste before removing the cannabis waste from the licensed premises. A licensee shall render the cannabis into cannabis waste by grinding and incorporating the cannabis with other ground material so that the resulting mixture is at least 50 percent noncannabis material by volume. A licensee shall render cannabis into cannabis waste and track that waste by batch. (f) Cannabis that a licensee wishes to deposit at a compostable materials handling facility or at an invessel digestion facility may be rendered cannabis waste by incorporating any nonhazardous compostable material, as defined in Title 14 of the California Code of Regulations at Section 17852 (a)(11), that a compostable materials handling facility or in-vessel digestion facility may lawfully accept. (g) Unless a licensee will compost onsite, after a licensee renders the cannabis into cannabis waste, a licensee shall do one of the following with the cannabis waste: (1) Dispose of the cannabis waste at a manned and fully permitted solid waste landfill; (2) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted compostable materials handling facility; or (3) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted in-vessel digestion facility. (h) In addition to all other tracking requirements set forth in Sections 8404 and 8405 of this Chapter, a licensee shall use the track-

and-trace system and onsite documents to ensure the cannabis waste materials are identified, weighed, and tracked while on the licensed premises and when disposed of or deposited in accordance with subsection (g). (i) A licensee shall enter the date and time that the cannabis was rendered cannabis waste and the weight of the resulting cannabis waste into the track-and-trace database.

(j) A licensee shall maintain accurate and comprehensive records regarding cannabis waste material that account for, reconcile, and evidence all activity related to the generation and disposal or disposition of cannabis waste. A licensee shall obtain a record from the solid waste facility evidencing the acceptance of the cannabis waste material at the facility. The record shall contain the name and address of the facility, the date, and the volume or weight of the cannabis waste accepted. These documents are records subject to inspection by the Department and shall be kept in compliance with Section 8400 of this Chapter. (k) A licensee shall enter the date and time of the disposal or deposit of the cannabis waste at a solid waste facility, compostable materials handling facility, or an in-vessel digestion facility into the track and-trace system. 14.7. Growing Medium Management The CDFA CalCannabis Program describes soils handling as follows: "Soils used in cannabis cultivation may be treated, reused, stockpiled, and/or discarded. For reuse, soils are piled and covered with tarps for an extended period (months to a year) to allow heat from sunlight to destroy any potential soil pathogens or pests. Another practice for soil reuse is to run a compost tea through the soils between harvests to restore soil nutrients. Although it is not a direct component of the Proposed Program, another aspect of soil reuse can include laboratory testing of soil samples to identify nutrient deficiencies or other issues. Identifying such deficiencies allows the soil to be properly treated or amended with fertilizers or other soil amendments, thereby correcting these deficiencies, prior to being reused with a new cannabis crop." (CDFA 2017)

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

Water Resources

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

According to the 2006 Lake County Groundwater Management Plan (www.lakecountyca.gov), the Sunny S Ranch is in the Collayomi Valley Basin in the southern portion of Lake County.

This basin includes Collayomi and Long Valley, both in the Upper Putah Inventory Unit.

"The two valleys are considered a single groundwater basin due to their hydrologic continuity. The Franciscan Formation borders the basin to the west, and a mixture of Serpentinized Ultramafic Rocks and Franciscan Formation borders the basin to the north, east, and south. A small area of volcanic rocks borders the central southern portion of the valley. The boundary is typically the edge of the valley floor except where water bearing basalt and landslide debris extend beyond the valley floor. Water-Bearing Formations Quaternary Alluvium Quaternary alluvium in the Collayomi Valley Basin consists of deposits of clay and silt, with localized areas of channelized gravel. Near Putah Creek, shallow deposits of fine sand and cobbles are present. The maximum thickness of alluvium in the basin is approximately 350 feet in Collayomi Valley, and 475 feet in Long Valley (DWR 1976). Alluvium generally is a productive water bearing unit. Groundwater Hydrogeology Recharge occurs in the Collayomi basin next to Putah, Dry, and St. Helena Creeks. Some recharge also occurs from infiltration of irrigation water and direct rainfall. Recharge in Long Valley may be impeded by hardpan conditions near the ground surface (DWR 1976).

Hydrographs show groundwater levels in the Collayomi Valley Basin are shallow in the spring and experience fluctuations over the irrigation season. Water levels in the basin range from 3 to 15 feet below the ground surface in the spring, and spring groundwater levels have remained generally constant over the last 40 years.

Spring to summer drawdown of groundwater is generally between 5 and 20 feet throughout the Collayomi Valley Basin. The direction of groundwater flow in the Collayomi Valley is to the north where it discharges to Putah Creek. Groundwater flow in Long Valley is from the southeast to the northwest where it also discharges to Putah Creek. Groundwater in both valleys generally flows the same direction as surface flow (CMA 1987). Groundwater levels in the basin seem to completely recover each wet season, and overall there does not appear to be any increasing or decreasing trend in groundwater levels.

Total storage in the basin is approximately 37,000 acre-feet (CMA 1987). DWR estimates groundwater storage in the Collayomi Basin to be 29,000 acre-feet with a useable storage capacity of 7,000 acre-feet (DWR 1960). Average-year agricultural groundwater demand in the Collayomi Valley basin is 266 acre-feet per year.

DWR monitors several wells for water quality in the Collayomi Valley Groundwater Basin. Monitoring is not extensive enough to determine trends in groundwater quality or the overall character of groundwater in the basin. Information obtained from DHS indicates that iron and manganese have been detected above SWQLs in Collayomi Valley and sulfide was identified as a constituent of concern by Collayomi Valley Stakeholders. Current information regarding inelastic land surface subsidence is unavailable.

There are 141 domestic wells and 34 irrigation wells in the Collayomi Valley Basin. Approximately 50 percent of domestic wells are shallower than 125 feet deep, and approximately 50 percent of irrigation wells are shallower than 150 feet deep." (2006 Lake County Groundwater Management Plan)

There is no year-round surface water source on the Sunny S Ranch site, and only during winter rain events is there any water seen in the drainage swale south of the 1 acre fenced cultivation area.

The SSR parcel has no wetlands or vernal pools. The nearest creek or stream is an unnamed, seasonal tributary of Putah Creek located approximately 1,500 feet from the boundary of the site.

An existing groundwater well serves the current house on the parcel and will also be used for the Cannabis cultivation operation. No surface water will be used or diverted in conjunction with the SSR cannabis cultivation activities. An analysis of the existing well was completed in 2017 by Alpha Analytical Laboratories, Inc. and is attached.

Water Resource Protection

This cultivation operation is enrolled as a Tier 1/Low Risk cultivation operation in the State Water Resources Control Board's *Order WQ 2017-0023-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order).

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

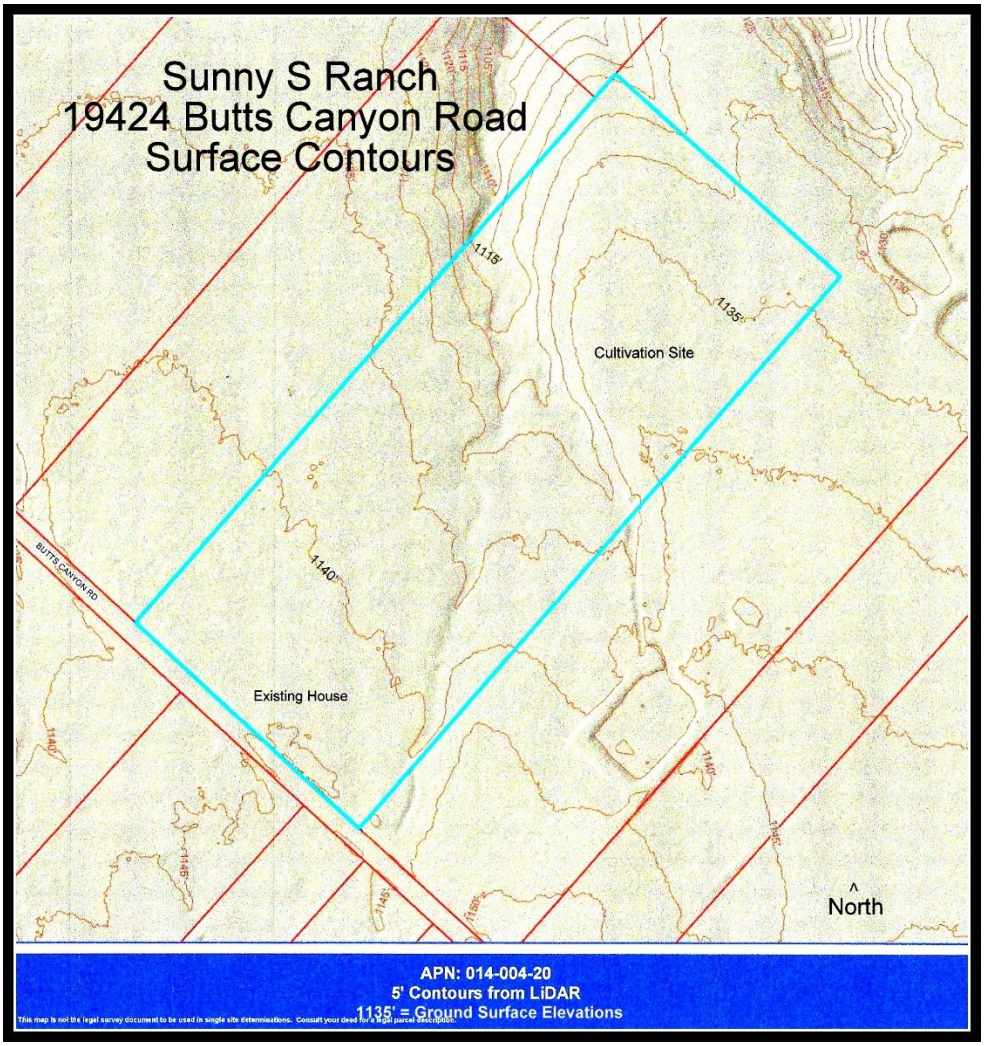
Avoidance and Minimization Measures

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

The following table provides slope calculations for the cultivation site, as well as the distance to the nearest waterbody.

Slope and Distance Calculations

Highest upslope elevation (feet)	Lowest downslope elevation (feet)	Distance between elevations (feet)	Slope (percent)	Distance to nearest waterbodies (feet)	Risk Level
1,140	1,115	25	1-10%	1,500 ft to an unnamed seasonal tributary of Putah Creek	Low



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

Best Management Practices

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

Water Quality Monitoring Program

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

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

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

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

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

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

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

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

- Knute jackson
- Shannon Sanders
- Denise Scoles
- Stormwater Management Consultant: Bill Van Der Wall

Record Keeping and Reports

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

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

Visual Inspection Plan

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

- All storm water drainage areas to identify any spills, leaks, or uncontrolled pollutant sources (if needed, the site manager should implement appropriate corrective actions);

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

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

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

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

Water Resources

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

The Cannabis cultivation operations will use water from an existing groundwater well (see Maps). This well is permitted with the County and uses an electric pump. See the attached analysis from Alpha Analytical Laboratories, Inc - dated 18 August 2017 and the LC -Cal Tech Pump test dated 8-14-17. The well produces approximately 11 gallons per minute.

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

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

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

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

CDFA (2017) reports the following regarding the water use for cannabis:
"*According to Hammon et al. (2015), water use requirements for outdoor cannabis production (25-35 inches per year) are generally in line with water use for other agricultural crops, such as corn (20-25 inches per year), alfalfa (30-40 inches per year), tomatoes (15-25 inches per year), peaches (30-40 inches per year), and hops (20-30 inches per year). Lindsey (2012) similarly cites a University of California researcher who suggested that cannabis does well under irrigation management and, as a small-acreage crop, will use far less water than crops such as cotton. Estimates of daily water usage per cannabis plant range from 5 gallons (Live Science 2014) to 6-8 gallons (CDFW 2016)*."

CDFA (2017) concludes the following regarding groundwater impacts from small cultivation operations: "*Based on the relatively low quantities of water use (from 0.002 to 1.8 acre-feet per year), the likelihood that an individual cultivator or group of cultivators using groundwater from a defined alluvial aquifer would, by themselves, cause substantial groundwater overdraft is considered unlikely, for several reasons. First, groundwater overdraft is typically caused by the combination of various uses in a basin and is not typically attributable to a particular user or set of users; in other words, it is typically a cumulative issue (which is discussed in more detail in Chapter 6, Cumulative Considerations). In addition, the size limitations for cultivation sites under the Proposed Program would limit the maximum extent of water use. For instance, the highest estimate, provided by Hammon et al. (2015), would result in less than 3 acre-feet of annual usage at the largest allowable cultivation site of 1 acre. Finally, no information is available to suggest that there would be high concentrations of cultivators using groundwater from an alluvial basin in a particular location in a manner that could substantially affect neighboring wells*." (pages 4.8-34 to 4.8-35)

Sunny S Ranch cultivation staff estimates that the cultivation project water demand/usage will average 1,800 gallons per day and that peak demand could reach 5,000 – 7,000 gallons per day. The exisitng residential use age is approximately 300 gallons per day. With an existing well production capacity of up to 15,000 gallons per day, based on a recent well test, there is sufficient water capacity for both the proposed cultivation project and the residential use.

Water Conservation

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

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

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

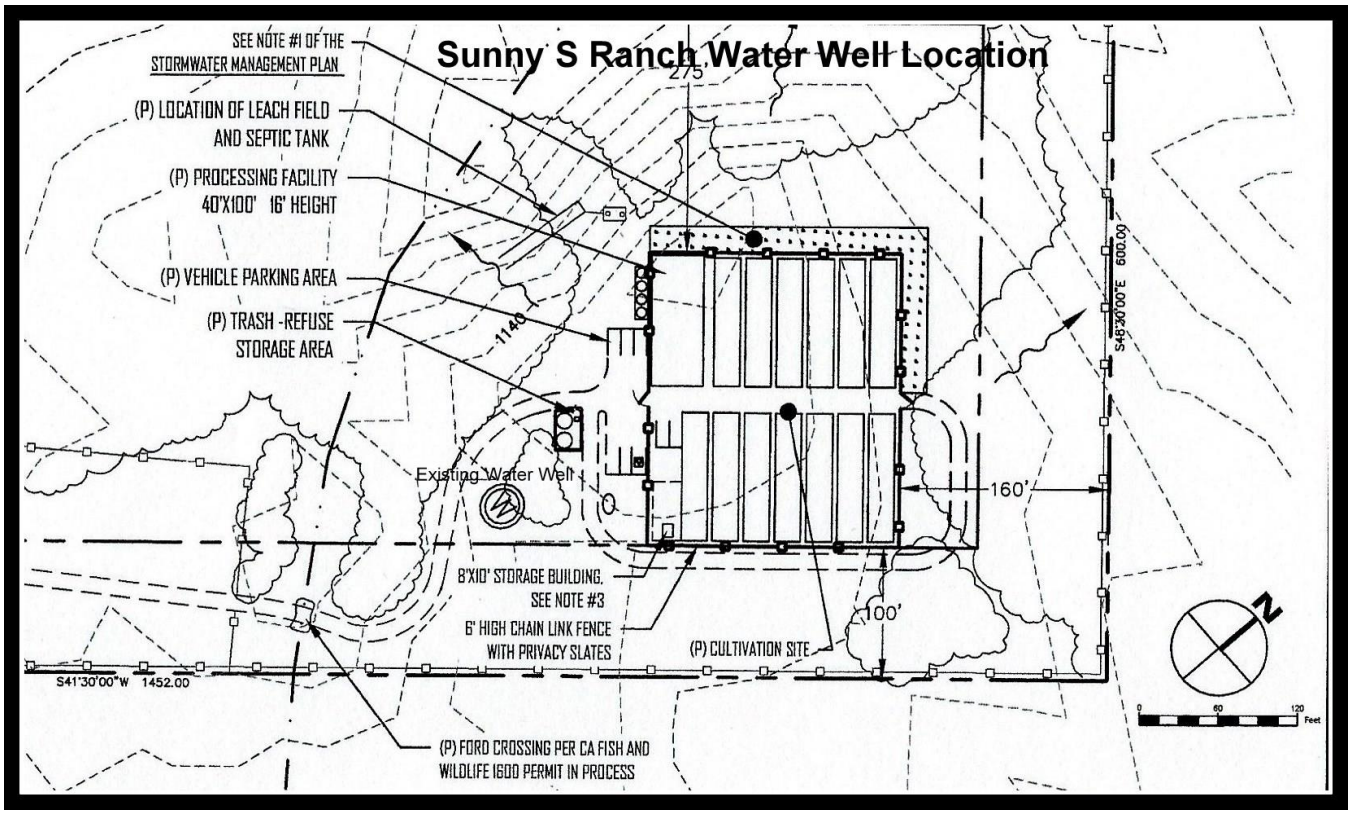
- CASQA Construction BMP Fact Sheet NS-1: Water Conservation Practices will be implemented to prevent discharges from water supply equipment. Water application rates will be minimized as necessary to prevent runoff and ponding and water equipment leaks will be repaired immediately.
- Construction BMP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

Irrigation System

At the cultivation site, the water supply will fill storage tanks (1,000 gallons each); a well monitor and water meter will meter the water use. Water filtration and water heating systems may also be installed. This tank will supply gravitational head to the irrigation system. PVC pipes will deliver the water to the planting stations. Mixing tanks (plastic totes, 250 gallon) may be used to add liquid soil amendments or fertilizers and spliced into

these supply lines. At each planting station, black polyvinyl flexible tubes and drip emitters will be used to irrigate the plants.

When this irrigation system is fully designed, this Plan will provide calculations of the efficiency of the irrigation system using the methodology of the Model Water Efficient Landscape Ordinance (California Code of Regulations, Title 23, Division2, Chapter 27).



Monitoring and Reporting for County Licensing

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

Compliance Monitoring

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

Annual Reports - Performance Review

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

References:

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

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

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

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

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

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

Exhibit 1

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

Air Quality

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

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

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

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

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

b. Providing property owners and residents of property within a 1,000-foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.

c. Policies and procedures describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.

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

e. Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.

Cultural Resources

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

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

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

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

Energy Usage

Intent: Permittees shall minimize energy usage.

In this section permittees shall: a. Provide energy calculation as required by the California Building Code. b. Identify energy conservation measures to be taken and maintained including providing proof of compliance with CCR Title 3, Division 8, Chapter 1, Section 8305 the Renewable Energy Requirements. c. If alternative energy sources are to be used, describe those sources and the amount of electricity that will be provided. d. For indoor cannabis cultivation licensees, ensure that electrical power used for commercial cannabis activity shall be provided by any combination of the following:

(1) On-grid power with 42 percent renewable source.

(2) Onsite zero net energy renewable source providing 42 percent of power.

(3) Purchase of carbon offsets for any portion of power above 58 percent not from renewable sources.

4) Demonstration that the equipment to be used would be 42 percent more energy efficient than standard equipment, using 2014 as the baseline year for such standard equipment. e. Describe what parameters will be monitored and the methodology of the monitoring program.

Fertilizer Usage

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

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

a. Complying with all fertilizer label directions;

b. Storing fertilizers in a secure building or shed;

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

d. Applying the minimum amount of product necessary;

e. Preventing offsite drift;

f. Not spraying directly to surface water or allow fertilizer product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

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

h. Nor using fertilizer within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

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

This section shall include a map of the parcel where the cultivation site is located showing any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record and a 100-foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. This map shall include the location of where fertilizers will be stored and used.

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

Fish and Wildlife Protection

Intent: To minimize adverse impacts on fish and wildlife.

In this section permittees shall include:

a. A description of the fish and wildlife that are located on or utilize on a seasonal basis the lot of record where the permitted activity is located;

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

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

d. Describe how the permittee will minimize adverse impacts on the fish and wildlife; and

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

Operations Manual

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

This section shall include the following:

a. Authorization for the County, its agents, and employees, to seek verification of the information contained within the development permit or use permit applications, the Operations Manual, and the Operating Standards at any time before or after development or use permits are issued;

b. A description of the staff screening processes;

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

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

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

f. The permittee shall establish and implement written procedures to ensure that the grounds of the premises controlled by the permittee are kept in a condition that prevents the contamination of components and cannabis products. The methods for adequate maintenance of the grounds shall include at minimum:

- The proper storage of equipment, removal of litter and waste, and cutting of weeds or grass so that the premises shall not constitute an attractant, breeding place, or harborage for pests.
- The proper maintenance of roads, yards, and parking lots so that these areas shall not constitute a source of contamination in areas where cannabis products are handled or transported.
- The provision of adequate draining areas in order to prevent contamination by seepage, foot-borne filth, or the breeding of pests due to unsanitary conditions.
- The provision and maintenance of waste treatment systems so as to prevent contamination in areas where cannabis products may be exposed to such a system's waste or waste by-products.
- If the lot of record is bordered by grounds outside the applicant's control that are not maintained in the manner described in subsections (i) through (iv) of this section, inspection, extermination, and other reasonable care shall be exercised within the lot of record in order to eliminate any pests, dirt, and/or filth that pose a source of cannabis product contamination.

Pest Management

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

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

a. Complying with the California Food and Agriculture Code, Division 6 Pest Control Operations and Division 7 Agriculture Chemical; Chapter 1 – 3.6 and California Code of Regulations, Division 6 Pest Control Operations.

b. Complying with all pesticide label directions;

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

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

e. Preventing offsite drift;

f. Not applying pesticides when pollinators are present;

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

h. Not spraying directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

i. Not applying pesticides when they may reach surface water or groundwater;

j. Using only properly labeled pesticides; and

k. Not using pesticides within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.

This section shall include a map of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record and a 100-foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. This map shall include the location of where pesticides will be stored and used.

Security

Intent: To minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The Applicant shall provide adequate security on the premises, as approved by the Sheriff and pursuant to this section, including lighting and alarms, to ensure the safety of persons and to protect the premises from theft.

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

a. Prevent access to the cultivation site by unauthorized personnel and protect the physical safety of employees. This includes, but is not limited to: ● A description of fences. ● Establishing physical barriers to secure perimeter access and all points of entry (such as locking primary entrances with commercial-grade, non-residential door locks, or providing fencing around the grounds, driveway, and any secondary entrances

including windows, roofs, or ventilation systems); ● Installing a security alarm system to notify and record incident(s) where physical barriers have been breached; ● Establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors; ● Maintaining the premises such that visibility and security monitoring of the premises is possible; and ● Establishing procedures for the investigation of suspicious activities.

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

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

This section shall include a description of procedures on receiving complaints, responding to the complaints, maintaining records of all complaints and resolution of complaints, and providing a tally and summary of issues the annual Performance Review Report.

d. A description of the required video surveillance.

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

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

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

(iv) Areas that shall be recorded on the video surveillance system include, but are not limited to, the following: ● The perimeter of the cannabis cultivation site and cannabis nursery; ● Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises; ● Areas where cannabis is destroyed; ⍰ Limited-access areas; ● Security rooms; ● Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and ● The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.

(v) The surveillance system shall operate continuously 24 hours per day and at a minimum of 30 frames per second.

(vi) All exterior cameras shall be waterproof, I-66 minimum.

(vii) All interior cameras shall be moisture proof.

(viii) Cameras shall be color capable.

(ix) Video management software shall be capable of integrating cameras with door alarms.

(x) Video recordings shall be digital.

(xi) Thermal technology shall be use for perimeter fencing.

(xii) All cameras shall include motion sensors that activates the camera when motion is detected.

(xiii) In areas with inadequate lighting for the cameras being used, sufficient lighting shall be provided to illuminate the camera’s field of vision.

(xiv) All recording shall be located in secure rooms or areas of the premises in an access and environment controlled environment which is separate from the room where the computer and monitoring equipment is located.

(xv) All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.

(xvi) All video surveillance recordings are subject to inspection by the Department and shall be copied and sent, or otherwise provided, to the Department upon request.

(xvii) The video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images.

e. A description of the required fences.

(i) Any commercial cannabis cultivation site shall be enclosed by a fence. The fence shall include, at a minimum, the following: Posts set into the ground. The posts may be steel tubing, timber or concrete and may be driven into the ground or set in concrete. End, corner or gate posts, commonly referred to as "terminal posts", must be set in concrete footing or otherwise anchored to prevent leaning under the tension of a stretched fence. Posts set between the terminal posts shall be set at intervals not to exceed 10 feet. A top horizontal rail is required between all posts. The fence shall be attached to the posts and top horizontal rail.

(ii) No barbed wire, razor wire or similar design shall be used.

(iii) The cultivation area shall be screened from public view. Methods of screen may include, but is not limited to, topographic barriers, vegetation, or solid (opaque) fences.

Storm Water Management

Intent: To protect the water quality of the surface water and the stormwater management systems managed by Lake County and to evaluate the impact on downstream property owners.

This section shall include at a minimum:

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

b. Provide written and graphic representation of how the applicant will comply with the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board orders, regulations, and procedures as appropriate.

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

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

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

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

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

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

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

j. Describe the proposed grading of the property.

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

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

Waste Management

Intent: To minimize the generation of waste and dispose of such waste properly, to prevent the release of hazardous waste into the environment, minimize the generation of cannabis vegetative waste and dispose of cannabis vegetative waste properly, and manage growing medium and dispose of growing medium properly.

This section shall include the following components:

Solid Waste Management

The solid waste management section shall include:

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

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

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

Describe the waste collection frequency and method.

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

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

Hazardous Waste Management

The hazardous waste section shall include:

(1) Hazard Analysis.

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

The identification of potential hazards, including:

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

(2) Management Plan

The Management Plan shall:

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

- Identify all containers and container management;
- Describe storage locations and chemical segregation procedures;
- Describe hazardous waste manifest and recordkeeping protocol;

- Outline inspection procedures;
- Identify emergency spill response procedures;
- Describe staff responsibilities;
- Describe the staff training program;
- Describe the methodology on how the amount of hazardous materials and waste that is generated on the site, the amount that is recycled, and the amount and where hazardous materials and waste is disposed of, is measured; and
- Include A map of any private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record or within 100 feet of the lot of record and a 100 foot setback from any identified private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. The map shall also include any public water supply well on the lot of record or within 200 feet of the lot of record and a 200-foot setback from any public water supply well.

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

Cannabis Vegetative Material Waste Management

The cannabis vegetative material waste management section shall:

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

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

Describe how solid waste will be disposed; and

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

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

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

Water Resources

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

This section shall include:

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

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

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

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

e. A map of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 200 feet of the lot of record.

f. A topographic map of the parcel prepared by a licensed surveyor where the permitted activity is located with contours no greater than five (5) feet.

Water Use

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

(b) All permitted activities shall have a legal water source on the premises, and have all local, state, and federal permits required to utilize the water source. If the permitted activity utilizes a shared source of water from another site, such source shall be a legal source, have all local,

state, and federal permit required to utilize the water source, and have a written agreement between the property owner of the site where the source is located and the permitted activity agreeing to the use of the water source and all terms and conditions of that use.

(c) Permittee shall not engage in unlawful or unpermitted drawing of surface water.

(d) The use of water provided by a public water supply, unlawful water diversions, transported by a water hauler, bottled water, a water-vending machine, or a retail water facility is prohibited.

(e) Where a well is used, the well must be located on the premises or an adjacent parcel. The production well shall have a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. The methodology of the monitoring program shall be described. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The monitoring wells shall be constructed and monitoring begun at least three months prior to the use of the supply well. An applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually.

(f) Water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The application shall notify the Department within 7 days of the emergency and provide the following information:

a. A description of the emergency.

b. Identification of the retail water supplier including license number.

c. The volume of water supplied.

d. Actions taken to prevent the emergency in the future.

This section shall:

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

Storm Water Management Plan

Erosion control, also referred to as soil stabilization, consists of source control measures that are designed to prevent soil particles from detaching and becoming transported in storm water runoff. Erosion control BMPs protect the soil surface by covering and/or binding soil particles.

Water Pollution Control BMPs will be deployed in a sequence to follow the progress of site preparation / tilling / cultivation. As the locations of soil disturbance change, erosion and sedimentation controls will be adjusted accordingly to control storm water runoff at the downgrade perimeter and drain inlets.

BMPs will be mobilized as follows:

Year-round:

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

During construction:

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

Post-Construction:

- Disturbed areas that are substantially complete will be stabilized with permanent erosion control (soil stabilization) and vegetation (if within seeding window for seed establishment).

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

Implementation of rainy season BMPs: Installation to occur by October 1st of every year. Rainy season begins October 15.

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

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

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

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

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

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

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

Best Management Practices Resources consulted for BMP selection included:

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

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

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

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

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

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

Central Valley Regional Water Quality Control Board - Sunny S Ranch Site Management Plan
19424 Butts Canyon Road, Lake County, California WDID:5S17CC401847

Pursuant to the California Central Valley Regional Water Quality Control Board
Attachment D: Technical Report Guidance Order - WQ 2017-0023-DWQ

Shannon Sanders – Sunny S Ranch – High Quality Agricultural Service, LLC
415-717-8953
9/10/2018

The Sunny S Ranch (SSR) cannabis cultivation project is a proposed A-Type 3B Mixed-light operation on a 20 acre parcel located at 19424 Butts Canyon Road in Lake County, California - APN 004-004-20

Site Management Plan

1.1.1. Provide a map showing access roads, vehicle parking areas, streams, stream crossings, cultivation site(s), disturbed areas, buildings, and other relevant site features.

Response: See Site Management Plan.

1.1.2. Describe the access road conditions including estimating vehicle traffic, road surface (e.g., paved, rocked, or bare ground), and maintenance activities. Describe how storm water is drained from the access road (e.g., crowned, out slope, armored ditch, culverts, rolling dips, etc.).

Response: The Sunny S Ranch is an existing 20-acre rectangular shaped parcel.

The property is located at 19424 Butts Canyon Rd. in Lake County, California (APN 004-004-20), 3.7 miles east of Highway 29. It has been developed for many years with an existing single-family dwelling (manufactured home), a garage, storage container, fenced and cross fenced pastures, landscaping, and other improvements.

There is a history of pasturing horses and related ranching activities. The property is served by PG&E, and is developed with a domestic water well, sanitary septic system, asphalt driveway, satellite-TV, and other improvements.

The Sunny S Ranch (SSR) cannabis cultivation project is a proposed A-Type 3B Mixed-light operation. Construction of the cannabis cultivation facilities is slated for the Spring of 2019. There has been no construction activity associated with the cultivation facilities as of September 10, 2018.

The parcel is located on the north side of Butts Canyon Road, a paved County maintained roadway. A paved driveway approach provides site access to the house, garage, and pasture area.

The cannabis cultivation facilities will be developed and operated within a 1 acre fenced enclosure, set back over 1,065' from Butts Canyon Road, and will not be visible from the road or from adjoining properties. Setbacks of 100' from the southern property line, 160' from the back-property line, and 276' from the northern property line will be maintained. The cultivation site is within a burn scar from the 2016 Valley Fire.

The 1 acre fenced cultivation area enclosure will be a square shaped area with an outside dimension of 224' x 194'. A 6' tall chain-link fence with site obscuring slats will form the cultivation area perimeter enclosure.

The Sunny S Ranch cannabis cultivation facilities will include:

- A 40' x 100' wood frame processing building with 12-foot walls and 16-foot-tall gable height.
- Thirteen (13) – 20' x 98' steel cold frame greenhouses.
- A 20-foot-wide center access corridor.
- Ancillary facilities, parking, and storage areas.

The access route to the cultivation facilities will be provided via a 1,130' long, 12' wide base rocked driveway within the existing driveway alignment that extends in from the house driveway. This driveway will run north-northeast through an existing pasture area to the existing pump house/well site.

Six (6) parking spaces will be developed just outside the cultivation facilities fence and main gate.

The handicapped parking area will have a hard surface, either AC paving or concrete. Employees will be directed to park within this area and use keypad access to the cultivation facilities.

Vehicle traffic on the driveway will be light, estimated at less than 10 trips/ADT per day.

The cannabis cultivation facility driveway will be maintained by Sunny S Ranch staff on a regular basis. Maintenance activities will include regular visual inspections, raking or grading of the base rock surface to maintain a smooth driving surface, and replenishment of eroded or displaced rock materials as necessary.

Storm water runoff will be surface drained (out slope) from the access driveway consistent with the natural site topography. There will be some minor armoring of the bottom of the intermittent drainage channel crossing as depicted on the Site Management Plan.

1.1.3. Describe any vehicle stream crossing including the type of crossing (e.g., bridge, culvert, low water, etc.).

Response: A shallow intermittent drainage channel will be crossed at the 840' mark on the cultivation site driveway. This channel originates on the adjacent property and flows to the north west carrying a small volume of winter storm water flow to the north northwest.

Vehicles going to and from the cultivation facilities will drive over a low water crossing in the shallow channel. Discussion with the California Department of Fish and Wildlife has resulted in a recommendation to armor the channel bed with 4”-6” rock that will provide some protection for the channel bed, facilitate vehicle crossing, and allow water to flow unobstructed.

1.1.3.1. Identify, discuss, and locate on the site map any legacy waste discharge issues that exist on the property.

Response: The existing house (manufactured home) located adjacent to Butts Canyon Road has an existing County approved underground septic disposal system in place. There are no known violations or legacy waste discharge issues on the property

1.2.1.1. Describe the BPTC measures that have been or will be implemented to prevent or limit erosion. Provide an implementation schedule for BPTC measures that have not yet been implemented. Identify the erosion prevention BPTC measures on a site map.

Response: The Site Management Plan provides detail regarding the proposed 1 acre fenced grow site and adjacent area and includes a graphic representation of how storm water runoff will be managed to protect downstream receiving water bodies from water quality degradation.

All applicable orders, regulations, and procedures of the Central Valley Regional Water Quality Control Board will be complied with.

Greenhouses will support the cultivation activities and any topsoil, pesticide or fertilizers used for the cultivation cannabis will be located at least 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

Storm water runoff from the 1-acre cultivation site will be managed in essentially three key ways.

- It is intended that storm water runoff from the processing building roof will be directed to a standard gutter system at the eaves, and then plumbed to a rainwater catchment system and 4 water storage tanks located just outside the main gate. This rainwater will be used for both fire protection sprinkler system and as a possible secondary irrigation source if needed.

- The surface of the 1 acre fenced cultivation area will be a pervious material (compacted road base rock) that will support and facilitate the absorption of rainwater.

- Any surplus storm water that leaves the site will be directed to a vegetated surface drainage sheet drainage area using the natural ground contours to an area to the northeast of the cultivation enclosure. It is not intended that the Sunny S Ranch will generate any illicit discharges of irrigation or storm water from the premises, as defined in Title 40 of the Code of Federal Regulations, Section 122.26, which could result in degradation of water quality of any water body will be prevented.

The surface water from the 1 acre fenced cultivation area will not discharge into a Lake County maintained drainage or conveyance system.

There are no public roads and bridges downstream of the onsite discharge point.

The development of the1 acre cultivation site will not increase the volume of water that historically has flow onto adjacent properties.

Given that some rainwater will be collected and stored in tanks, that there will be pervious surface materials used that will allow for storm water absorption, and that any other runoff will be direction to a flat natural surface dispersal area, the discharge of storm water will not increase flood elevations downstream of the discharge point.

In accordance with Section 24.1 of Chapter 29, Storm Water Management Ordinance of the Lake County Code, Sunny S Ranch will implement Best Management Practices to control the discharge of pollutants to the maximum extent practicable, and to eliminate non-storm water discharges that are not authorized or that are not in compliance with an NPDES permit.

The Sunny S Ranch manager will have responsibility for ensuring full compliance with the Site Management Plan and the Storm Water Management Ordinance of the Lake County Ordinance Code, including:

- Construction of effective erosion and sediment control measures.
- Implementing all non-storm water 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 storm water 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.
- Mobilization of staff to make immediate repairs to the control runoff.
- Coordinate with the landowner to assure all the necessary corrections/repairs are made immediately, and that the project complies with the Plan and relevant permits.

The proposed grading of the property will be minimal. The 1-acre cultivation site is located in an area that is essentially flat with a slight tilt to the northwest. Because of the flat plateau, and a wildland fire that went through the area in 2016, there is little vegetation on the site. Downed and burned trees will be cut up and removed, and there will be some grubbing of the site to remove any loose surface materials, fill voids and generally create a level surface. A 2-4" layer of road base rock will be spread over the inside perimeter of the 1-acre cultivation enclosure area.

Best management practices (BMPs) will be used during construction and post-construction. Post-construction BMPs shall be maintained through the life of the permit.

The parameters that the Sunny S Ranch will monitor include observation of winter storm water and runoff patterns for any turbidity. The methodology of the monitoring program will essentially involve a weekly or daily site inspection for signs of erosion including rivulets, gully formation, and pooling of concentrated sediments after big rainfall events.

Lake County requires that all cultivation operations be located at least 100 feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool). The Sunny S Ranch cultivation area will be over 1,300 feet from the nearest waterbody.

This cultivation operation is enrolled as a Tier I / Low Risk cultivation operation in the CVEWQCB - Water Resources Control Board's Order WQ 2017-0023-DWQ - General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order). Compliance with this Order will help ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Note also that a sediment and erosion control plan is being implemented as part of the larger Site Management Plan.

The cultivation operation will not alter the hydrology of the parcel significantly. Establishment of the cultivation operation requires minimal grading because it is on flat ground.

The site manager will monitor weather using National Weather Service reports (https://www.weather.gov/) to track conditions and alert crews to the onset of rainfall events.

Disturbed soil areas will be stabilized with temporary erosion control or with permanent erosion control as soon as possible after grading and construction is completed.

During the rainy season, disturbed areas will be stabilized with temporary or permanent erosion control before rain events.

Disturbed areas that are substantially complete will 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 will be deployed and inspected.

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

Water pollution control activities will be implemented by October 1st of every year. The rainy season runs from October 15 through April 1st of every year.

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

- Tilling, grading and excavation operations
- Soil import/export operations
- Structure installation process
- Driveway and parking area construction

The following pre-construction control measures exist within the project site:

- Vegetated drainage swales,
- Sufficient buffer distances between cultivation areas and drainages
- Paved house driveway
- Preservation of existing vegetation and introduced landscaping

1.2.1.1.1. The description shall address physical BPTC measures, (e.g., placement of straw mulch, plastic covers, slope stabilization, soil binders, culvert outfall armoring, etc.) and biological BPTC measures (vegetation preservation/replacement, hydro seeding, etc.).

Response: Specific CASQA erosion and sediment control BMPs will be implemented as listed below:

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

Erosion and sediment control details are provided on the Site Management Plan Map and indicate the recommended type and placement of erosion control measures.

Sediment control 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.

1.2.2.1. Describe the BPTC measures that have been or will be implemented to capture sediment that has been eroded. Provide an implementation schedule for BPTC measures that have not yet been implemented. Identify the sediment control BPTC measures on a site map.

Response: The Sunny S Ranch cultivation facilities have not yet been constructed and be BPTC measures to capture sediment that may become eroded have not yet been implemented. The following BPTC measures to capture sediment will be implemented in the future as needed:

- Preservation of existing vegetation – the preservation of existing vegetation around the cultivation site will help minimize the potential for sedimentation. Areas within the site where no construction activity is planned will be maintained. (Spring and Summer 2019)
- Hydraulic mulching utilizing a wood fiber mulch may be used to stabilized disturbed soils. (late Summer 2019)

- Hydroseeding a mixture of wood fiber, seed, fertilizer, and stabilizing emulsion may be utilized. (Fall 2019)
- Plant-based soil binders such as a pitch or rosin emulsion may be applied to disturbed areas requiring short-term temporary protection. (Fall 2019)
- The application of straw mulch and incorporation of it with a studded roller or a stabilizing plant-based emulsion on disturbed soil areas will be considered. (Fall 2019)
- Straw bale barriers, sandbag barriers, silt fences, fiber roles, sediment traps, and geotextile mats may be considered for use depending upon the construction schedule and factors associated with time of year/rainy season weather. (Fall-Winter 2019)

1.2.2.1.1. The description shall address physical BPTC measures, (e.g., placement of silt fences, fiber rolls, or settling ponds/areas, etc.) and biological BPTC measures (vegetated outfalls, hydro seeding, etc.).

Response: The placement of silt fences, fiber rolls, straw bale or sandbag barriers may be considered depending upon the state of the construction site in the Fall of 2019. These physical BPTC measures will be evaluated as to the need and extent.

Particular attention will be given to the area north west of the cultivation site in the area identified as the surface water sheet flow area. The use of settling ponds or sediment traps will only be considered if the need arises. Hydroseeding and Hydro mulching will be utilized to stabilize disturbed areas in the Fall of 2019.

1.2.3.1. Describe how the erosion prevention and sediment control BPTC measures will be monitored and maintained to protect water quality.

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

A visual monitoring (inspection) program will be implemented when construction begins and will continue every week during the winter rainy season.

Special inspections will be performed prior to predicted major rain events and contain the following focal areas:

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

Any sediment that is captured within silt fences, sediment traps, sand or straw bale barrios, or other barriers will be properly handled and disposed of (see below).

A copy of Site Management Plan will be made available to the site personnel or contractor representatives engaged in the maintenance or installation of BMPs.

Water pollution caused by ineffective construction or cultivation practices will be noted by site personnel and appropriate and proper erosion and sedimentation control practices, along with special follow-up inspection for further training should be conducted.

The Project Manager will organize orientation sessions with all personnel upon initiation of a specific project activity or change in key personnel.

These sessions will be setup to ensure that all operations are implemented in accordance with this Plan. Training sessions will be included as part of regular personnel safety meetings to familiarize works with the requirements of the Plan.

1.2.3.2. Describe how any captured sediment will be either stabilized in place, excavated and stabilized on-site, or removed from the site

Response: Sediment that accumulates as a result of storm water runoff behind silt fences, straw or sandbag barriers will be periodically removed in order to maintain the system's effectiveness. Sediment will be removed when the accumulation reaches one half of the designated sediment storage volume. Sediment removed during maintenance activities will be properly managed. The sediment will be evaluated and used on site or disposed of accordingly. Options will include incorporating sediment into earth work on the site, or off-site export/disposal at an appropriate location.

1.2.4. Describe the interim soil stabilization, if applicable and long term BPTC measures implemented to prevent sediment transport at each identified disturbed area and improperly constructed features.

Response: There have been no construction activity associated with the Sunny S Ranch cultivation project and no interim soil stabilization has been needed. Land disturbance will be limited to existing grades and vegetation to the actual site of the cleanup or remediation and any necessary access routes. The Sunny S Ranch will ensure that access road is not allowed to develop or show evidence of significant surface rutting or gullying. The Sunny S Ranch will only use appropriate erosion control measures to minimize erosion of disturbed areas, potting soil, or bulk soil amendments to prevent discharges of waste. Fill soil will not be placed where it could discharge into surface water. If used, weed-free straw mulch will be applied at a rate of two tons per acre of exposed soils and, if warranted by site conditions, shall be secured to the ground.

2.1. Provide a summary table that identifies the products used at the site, when they are delivered to the site, how they are stored, and used at the site. If products are not consumed during the growing season, describe how they are removed from the site or stored to prevent discharge over the winter season.

Summary of Fertilizer and Pesticide, Herbicide, Rodenticide

<u>Fertilizers to be used at the site.</u>

1.chicken manure

2.soluable sea weed

3.bat guano

4.hygrozyme

5.thermex

6.epsome salt

7.presipitated bone meal

8.dolomite

9. liquid plant therapy

10. sulphur

11. Dr. Zyme

When are they delivered to the site - Weekly or as needed.

How are they to be stored at the site. In their product containers, on shelving within a locked watertight shed. - In their product containers, on shelving within a locked watertight shed.

How are they used - In accordance with product directions. Delivered in portable trailer tank. In accordance with product directions. Delivered in portable trailer tank.

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

2.2. Provide a site map that locates storage locations.

Response: See Site Management Plan

2.3. Describe how bulk fertizers and chemical concentrates are stored, mixed, applied, and how empty containers are disposed.

Response: The Sunny S Ranch will store all fertilizers, pesticides, or other chemical compounds in the 8'x10' storage building at the back of the inside parking and work area as depicted on the CVRWQCB Site Management Plan map. This will be a secure, covered, locked building. Mixing of fertilizers and other chemical compounds will occur in front of the processing building roll up door or inside the building. The basic methodology for application will involve mixing in a large tank, pulled by a truck and hand/nozzle application. Chemical concentrates will not be mixed, prepared, over applied, or disposed of in any location where they could enter the riparian setback or waters of the state. The use of agricultural chemicals inconsistently with product labeling, storage instructions, or DPR requirements for pesticide applications is prohibited by Sunny S Ranch. Disposal of any unused product and containers will be consistent with labels.

2.4. Describe procedures for spill prevention and cleanup.

Response: Spill and leak prevention is an important issue at the Sunny S Ranch. Any hazardous materials will be used and stored in accordance with product directions within the storage shed. No dumping signs will be posted. Drip pans and absorbent materials will be placed beneath tanks and traps during filling or unloading of tanks. Spill cleanup materials will be stored in an accessible location. Tanks will be checked for leaks on a regular basis. Product labels will be maintained. The site manager will be responsible for spill and leak monitoring and will maintain a log of spills and accidental leaks.

Spill response and cleanup will be immediate. Rags will be used for small spills, damp mops for general cleanup, and commercial absorbent materials for large spills. Brooms or a shop vac will be used for dry spills.

Hosing down of spills will not be permitted.

Private clean up contractors may be hired for large spills.

Reporting of large spills that could pose a threat to human health will be reported to the County Environmental Health Department.

Sunny S Ranch will maintain the CASQA operational guidelines on site and will conduct periodic training for employees regarding spill prevention and cleanup.

3.1. Petroleum Product BPTC Measures - Provide a summary table that identifies the products used at the site, when they are delivered to the site, how they are stored, and used at the site. If products are not consumed during the growing season, describe how they are removed from the site or stored to prevent discharge over the winter season.

Response: Summary Table - Petroleum Products
Fuels Lubricants Other Petroleum Products
Petroleum products to be used at the site. 1.Gasoline
2.
1.Oil
2.
3.
1.Propane gas
2.
3.
When are they delivered to the site. As needed, every month
As needed
1.As needed, every 2-4 weeks by local propane company.
Where and how are they to be stored at the site. 1 to 5-gallon commercial container.
1.
2.
1.On site 500-gallon propane tank.
How are they used. 1.Pour into small equipment gas tanks
1.Applied to equipment as needed.
1 Fuel source for heaters.

How are they going to be removed from the site or stored over the winter to prevent discharge or leaks. 1.Stored in commercial storage container on a shelf in the shed.
1. Stored in commercial storage container on a shelf in the shed.
1.Stored in approved above ground tank.

2.2. Provide a site map that locates storage locations.

Response: See Site Management Plan.

3.3. Describe how fuels, lubricants, and other petroleum products are stored, mixed, applied, and empty containers are disposed.

Response: It is understood that spills and leaks of fuels, oil and grease can contribute to storm water runoff pollution. Off-site fueling will occur whenever possible as these businesses are better equipped to handle fuel and spills properly.

The focus will be on prevention of spills and leaks during transfer operations.

Good housekeeping methods will be used to cleanup spot leaks and drips with proper disposal of the absorbent rags and materials.

Signs and notices will be posted to indicate that fuels and oils are not to be poured into sinks or into open site areas.

A locked watertight 8’ x 10’ storage shed will be constructed to provide a secure location for fuels and petroleum products.

The Sunny S Ranch will not mix or fill equipment with gas or oil in any location where they could enter the riparian setback or waters of the state. The use of petroleum products inconsistently with product labeling, storage instructions, or DPR requirements is not allowed. Disposal of unused product and containers shall be consistent with labels.

The Sunny S Ranch site manager will be responsible for monitoring, educating employees, and managing the storage, mixing, application, and disposal of petroleum products. Inspection of vehicles and equipment, and the cleaning of the cultivation area will be done on a regular basis.

An adequate stockpile of spill cleanup materials will be maintained on site, rags will be used for small spills, mops for general cleanup, and dry absorbent materials for larger spills. Cleanup materials will be removed promptly and disposed of in accordance with proper handling and waste management.

Liquid waste will not be poured into floor drains, sinks, outdoor open areas.

Employees will be trained as to the proper methods of handling and disposing of waste materials, spill cleanup, with training provided annually.

3.4. Describe procedures for spill prevention and cleanup.

Response: Procedures for spill prevention and cleanup include regular inspection of vehicles and equipment. Cleanup approaches will include:

- Sweeping of the storage areas weekly and sweeping up of dry spills when needed.

- No hosing down of spills with water.
- Posting of signage at storage and fueling areas advising against topping off of fuel tanks.
- Construction of perimeter berm around the storage area to contain any potential spills.
- Covering the fuel area to prevent rain water intrusion.
- Spot cleaning.
- Visual inspection of fertilizer tanks for corrosion, failure of piping systems, leaks, loose fittings, tank support, and checking for cracks or scratches.
- Use of watertight wet waste receptacles for disposal of absorbent materials.
- Use of drip pans when possible.
- Employee spill prevention and cleanup training.

4.1. Describe the types of trash/refuse that will be generated at the site. Describe how the material is contained and properly disposed of.

Response: The Sunny S Ranch will generate a small amount of waste on annual basis. The estimated peak waste generation in pounds per week:

- Paper - 3 lbs.
- Glass - 5 lbs.
- Metal - 5 lbs.
- Electronics - 1 lb.
- Plastic - 10 lbs.
- Organic green waste - 150 lbs.
- Household waste - 5 lbs.

A trash enclosure will be located just outside of the fenced area of the cultivation site adjacent to the parking area. Waste bins will consist of trash cans (20 or 35 gallon) with lids or roll-off toters with lids. The locations of waste bins / toters are shown on the site plan.

Recyclables will be segregated from solid waste and stored in the enclosure.

At weekly intervals, Sunny S Ranch staff will transfer the waste containers by truck in and deposit them in an appropriate recycling facility. Recyclables such as scrap metal, glass, metal and plastic containers, can be conveniently unloaded at a recycling drop-off center (a Lake County Integrated Waste Management facility or private facility). Cardboard and newspaper may be recycled or mixed in with other composting materials.

Yard waste, organic green waste, and other compostable materials will be segregated from the solid waste and deposited at an appropriate transfer facility or composted on site. Recyclable wood will be dropped off at a compost facility where it is processed as new compost. Household toxic materials will be segregated from the solid waste and disposed of at a Lake County Integrated Waste Management facility.

The Sunny S ranch will contain and regularly remove all debris and trash associated with cannabis cultivation activities from the cannabis cultivation site. Sunny S Ranch will only dispose of debris and trash at an authorized landfill or other disposal site in compliance with state and County laws, ordinances, and regulations. Litter, plastic, or similar debris will not be allowed to enter waters of the state. Cannabis plant material will be disposed of onsite in compliance with any applicable CDFA license conditions.

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

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

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

A sandbag barrier (Construction BMP Factsheet SE-8) will be placed around trash enclosure/waste storage areas to prevent stormwater run-on from adjacent upstream areas. Materials can be elevated with palettes or cement blocks to minimize contact with stormwater. Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers will be maintained and stored in the residence or shipping container.

To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles will be surrounded with sediment controls (Construction Factsheets BMP SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers will be used, as needed, before rain events or before strong winds begin.

BMPs will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction Factsheet BMP WM-5 Solid Waste Management). Solid waste will be removed and disposed off-site at least weekly at a proper receiving facility. All chemicals will be stored in the greenhouse or stormproof sheds. Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

Storage of soil amendments and raw materials will be carried in accordance with CASQA Industrial BMP sheets including:

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations
- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip.

The CDFA Cal Cannabis Program states, “Cultivators must comply with the California Integrated Waste Management Act of 1989, which requires that all California cities and counties reduce, recycle, and compost at least 50 percent of wastes by 2000.” (CDFA 2017) Solid waste will be reduced using some combination of the following strategies and activities:

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

4.1.1. Provide a site map that locates the trash/refuse storage locations.
Response: See Site Management Plan
4.2. Describe the number of employees, visitors, or residents at the site.
Response: The Sunny S Ranch cultivation facility may employ up to 10 people, depending on the need, in the following positions:

- 1 lead grower/cultivation facility site manager
- 2 associate growers or technicians
- 6 or 7 seasonal trimmers/laborers.

The Sunny S Ranch will also establish a sign-in/sign-out protocol/procedure with identification badges for authorized personnel, suppliers, and/or visitors.

The cultivation operations are closed to the general public. Visitation is only allowed when specific permission is granted. All staff, all suppliers, all product transporters, and all visitor must sign the log in-out sheet.

The property is developed with an existing single-family dwelling (manufactured home), a garage, storage container, fenced and cross fenced pastures, landscaping, and other typical improvements. The residence is served by PG&E, and is developed with a domestic water well, sanitary septic system, asphalt driveway, satellite TV, and other typical improvements. Occupancy of the home will be available for cultivation facility ownership and management.

4.2.1. Describe the types of domestic wastewater generated at the site (e.g., household generated wastewater or chemical toilet).

Response: Standard domestic/household waste water in small quantities (shower, sinks, washing machine, dishwasher) is generated at the house and disposed of in the existing sanitary septic system.

4.2.2. Describe how the domestic wastewater is disposed.

Response: Standard domestic/household waste water is disposed of in the existing on site sanitary septic system.

4.2.2.1. Permitted onsite wastewater treatment system (e.g., septic tank and leach lines).

Response: Existing approved onsite septic system.

4.2.2.2. Chemical toilets or holding tank. If so, provide the name of the servicing company and the frequency of service.

Response: N/A

4.2.2.3. Outhouse, pit privy, or similar. Use of this alternative requires approval from the Regional Water Board Executive Officer; include the approval from the Executive Officer and any conditions imposed for use of this alternative.

Response: N/A

4.2.2.3.1. Provide a site map that locates any domestic wastewater treatment, storage, or disposal area.

Response: See Site Management Plan

5.1. Describe activities that will be performed to winterize the site and prevent discharges of waste. The description should address all the issues listed above.

Response:

- Winterization of the site will occur in October of each year.
- Implementation of various winterization actions will take place in order to close down the site.
- Cleaning up of trash, packing materials, paper, and debris on site.
- Raking and repairing the ground surface and any protective berms.
- Securing and packing of greenhouse covers inside the processing building.
- Building, equipment, and site maintenance.

Stockpile management will include:

- Locating stockpiles, a minimum of 50 feet away from drainage courses
- Protection of stockpiles from storm water runoff using temporary perimeter barriers including berms, fiber roles, silt fences, sandbags, or straw bales.
- Placing materials on pallets under a roof.
- Covering stockpiles with tarps or heavy-duty plastic
- Regular inspection and maintenance of stockpile areas.

5.2. Describe maintenance of all drainage or sediment capture features (e.g., drainage culverts, drainage trenches, settling ponds, etc.) to remove debris, soil blockages, and ensure adequate capacity exists.

Response: The Sunny S Ranch site manager will inspect the site drainage and sediment capture features prior to forecasted rain events, daily during extended rain events, after significant rain events, and generally once or twice a month during the non-rainy season.

- Outlet areas will be inspected for erosion and stabilization and any berms or banks will be checked for seepage and structural soundness.
- Outlet structures in any drainage courses will be inspected for damage and or obstructions.
- Fencing will be inspected for damage.
- Facilities will be checked for any standing water and repaired if necessary.
- Sediment that accumulates will be periodically removed in order to maintain capacity sediment will be incorporated into site earth work or disposed of in an appropriate location.
- Vegetation that is interfering with drainage will be removed to prevent pooling of standing water.

5.3. Describe any revegetation activities that will occur either at the beginning or end of the precipitation season.

Response: Revegetation activities will likely be in the form of hand broadcasting of grass seed or hydroseeding combined with hydraulic mulching. Prior to application of any seeds, the receiving areas will be roughened in order to increase the effectiveness of seed germination and growth.

Application of a straw mulch to keep seeds in place and to moderate soil moisture and temperature until the seeds germinate and grow may be necessary.

All seeds will be in conformance with the California State Seed Law. Each bag will be delivered to the site sealed and clearly marked.

Areas to be re-vegetated may be rolled with a crimping or punching type of roller or by track walking.

Hydraulic mulches such as a wood fiber will likely be used and worked into the soil as needed.

Revegetation would occur a minimum of 24 hours before a forecasted rain event.

Solid Waste Management Plan

A sandbag barrier (Construction BMP Factsheet SE-8) can be placed around waste storage areas to prevent stormwater run-on from adjacent upstream areas. Materials can be elevated with palettes or cement blocks to minimize contact with stormwater. Spill clean-up materials, safety data sheets, a hazardous material inventory, and emergency contact numbers will be maintained and stored in the residence or shipping container. To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles will be surrounded with sediment controls (Construction Factsheets BMP SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers will be used, as needed, before rain events or before strong winds begin.

BMPs will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction Factsheet BMP WM-5 Solid Waste Management). Solid waste will be removed and disposed off-site at least weekly at a proper receiving facility. Any chemicals will be stored in the greenhouse or stormproof sheds. Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

Storage of soil amendments and raw materials will be carried in accordance with CASQA Industrial BMP fact sheets including:

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations
- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip. 14.2.3. Solid Waste Reduction

Hazardous Waste Management Plan

The following CASQA Industrial BMP fact sheets will be followed by Sunny S Ranch staff in carry out fueling activities (copies attached):

- SC-20: Vehicle and Equipment Fueling
- SC-21: Vehicle and Equipment Cleaning
- SC-22: Vehicle and Equipment Maintenance and Repair

If needed a sandbag barrier can be placed around waste storage areas to prevent stormwater run-on from adjacent upstream areas.

An existing shipping container located at the front of the parcel may be used to store hand tools, small parts, and most cultivation materials that can be carried by hand.

Large items will be stored in the open in the general storage area and will be elevated with palettes or cement blocks to minimize contact with stormwater.

Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers will be maintained and stored in the residence or shipping container.

To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles will be surrounded with sediment controls (Construction BMP Factsheets SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers will be used, as needed, before rain events or before strong winds begin.

Best Management Practices will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction BMP Factsheet WM-5 Solid Waste Management).

Solid waste will be removed and disposed off-site at least weekly at a proper receiving facility.

Chemicals will be stored in the shipping containers or sheds.

Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

The storage of soil amendments and chemicals will employ the following CASQA Industrial BMP Fact Sheets (attached):

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations
- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip.

The spill prevention and control protocol includes the following components:

- Maintenance of spill kit for petroleum hydrocarbons on site and in fuel supply trucks to include: Containment drum; Oleophilic absorbent pads; and granular spill absorbent suitable for petroleum, brake fluid, and antifreeze;
- Daily inspection of equipment for oil and fuel leaks;
- Fueling only in the designated area; and
- Training of personnel on handling of leaks and spills (training at tailgate safety meetings).