



Referral
Early Consultation

Date: February 12, 2020
To: Distribution List (See Attachment A)
From: Jeremy Ballard, Associate Planner, Planning and Community Development
Subject: USE PERMIT AND DEVELOPMENT AGREEMENT APPLICATION NO.
PLN2019-0094 – CENTRAL VALLEY GROWERS, LLC – HOWARD ROAD II
Respond By: February 27, 2020

****PLEASE REVIEW REFERRAL PROCESS POLICY****

The Stanislaus County Department of Planning and Community Development is soliciting comments from responsible agencies under the Early Consultation process to determine: a) whether or not the project is subject to CEQA and b) if specific conditions should be placed upon project approval.

Therefore, please contact this office by the response date if you have any comments pertaining to the proposal. Comments made identifying potential impacts should be as specific as possible and should be based on supporting data (e.g., traffic counts, expected pollutant levels, etc.). Your comments should emphasize potential impacts in areas which your agency has expertise and/or jurisdictional responsibilities.

These comments will assist our Department in preparing a staff report to present to the Planning Commission. Those reports will contain our recommendations for approval or denial. They will also contain recommended conditions to be required should the project be approved. Therefore, please list any conditions that you wish to have included for presentation to the Commission as well as any other comments you may have. Please return all comments and/or conditions as soon as possible or no later than the response date referenced above.

Thank you for your cooperation. Please call (209) 525-6330 if you have any questions.

Applicant: Sarbjit Athwal dba Central Valley Growers, LLC
Project Location: North of Howard Road, east of the Delta Mendota Canal, in the Westley area.
APN: 016-019-032
Williamson Act Contract: 1972-1480
General Plan: Agriculture
Current Zoning: A-2-40 (General Agriculture)

Project Description: Request to operate a commercial cannabis cultivation business, including distribution activities and processing of cannabis grown on site, in three phases for a total of 51, 254 square feet of building space. Phase 1 will consist of construction of a 5,000 square foot greenhouse building for flowering cultivation of cannabis, and a 4,735 square foot warehouse building for processing, distribution, and administrative activities. Phase 2 will include an additional 5,000 square foot greenhouse for flowering cultivation space. Phase 3 will construct six additional greenhouses for a total of 29,500 square feet. Of the eight total greenhouse buildings, five will be utilized for flowering cultivation and three for vegetative state cultivation for a total of 32,000 square feet of canopy space. The applicant anticipates 15 employees on a maximum shift with hours of operation as 6 A.M. to 9 P.M. seven days a week. Vehicle trips associated with supply

STRIVING TOGETHER TO BE THE BEST!

deliveries and own-product distribution are anticipated as three and a half a week and will only take place between 8 A.M. to 5 P.M. The site will be served by an existing private well and development of a private septic system.

**Full document with attachments available for viewing at:
<http://www.stancounty.com/planning/pl/act-projects.shtm>**

USE PERMIT AND DEVELOPMENT AGREEMENT APPLICATION NO. PLN2019-0094 – CENTRAL VALLEY GROWERS, LLC – HOWARD ROAD II

Attachment A
Distribution List

X	CA DEPT OF CONSERVATION Land Resources		STAN CO ALUC
X	CA DEPT OF FISH & WILDLIFE		STAN CO ANIMAL SERVICES
	CA DEPT OF FORESTRY (CAL FIRE)	X	STAN CO BUILDING PERMITS DIVISION
	CA DEPT OF TRANSPORTATION DIST 10	X	STAN CO CEO
X	CA DEPT OF WATER RESOURCES		STAN CO CSA
X	CA RWQCB CENTRAL VALLEY REGION	X	STAN CO DER
	CA STATE LANDS COMMISSION	X	STAN CO ERC
	CEMETERY DISTRICT	X	STAN CO FARM BUREAU
	CENTRAL VALLEY FLOOD PROTECTION	X	STAN CO HAZARDOUS MATERIALS
	CITY OF:		STAN CO PARKS & RECREATION
	COMMUNITY SERVICES DIST:	X	STAN CO PUBLIC WORKS
X	COOPERATIVE EXTENSION		STAN CO RISK MANAGEMENT
	COUNTY OF:	X	STAN CO SHERIFF
X	FIRE PROTECTION DIST: WEST STAN	X	STAN CO SUPERVISOR DIST 5: DEMARTINI
X	HOSPITAL DIST: DEL PUERTO	X	STAN COUNTY COUNSEL
X	IRRIGATION DIST: DEL PUERTO		StanCOG
X	MOSQUITO DIST: TURLOCK	X	STANISLAUS FIRE PREVENTION BUREAU
	MOUNTAIN VALLEY EMERGENCY MEDICAL SERVICES	X	STANISLAUS LAFCO
	MUNICIPAL ADVISORY COUNCIL:	X	STATE OF CA SWRCB DIVISION OF DRINKING WATER DIST. 10
X	PACIFIC GAS & ELECTRIC	X	SURROUNDING LAND OWNERS
	POSTMASTER:	X	TELEPHONE COMPANY: AT&T
	RAILROAD:		TRIBAL CONTACTS (CA Government Code §65352.3)
X	SAN JOAQUIN VALLEY APCD		US ARMY CORPS OF ENGINEERS
X	SCHOOL DIST 1: PATTERSON JOINT UNIFIED		US FISH & WILDLIFE
	SCHOOL DIST 2:		US MILITARY (SB 1462) (7 agencies)
	WORKFORCE DEVELOPMENT		USDA NRCS
X	STAN CO AG COMMISSIONER		WATER DIST:
	TUOLUMNE RIVER TRUST	X	CDFA -CALCANNABIS CULTIVATION LICENSING
		X	CA DEPARTMENT OF CONSUMER AFFAIRS – BUREAU OF CANNABIS CONTROL

**STANISLAUS COUNTY
CEQA REFERRAL RESPONSE FORM**

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

**SUBJECT: USE PERMIT AND DEVELOPMENT AGREEMENT APPLICATION NO.
PLN2019-0094 – CENTRAL VALLEY GROWERS, LLC – HOWARD ROAD II**

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- _____ Will not have a significant effect on the environment.
- _____ May have a significant effect on the environment.
- _____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

Name Title Date

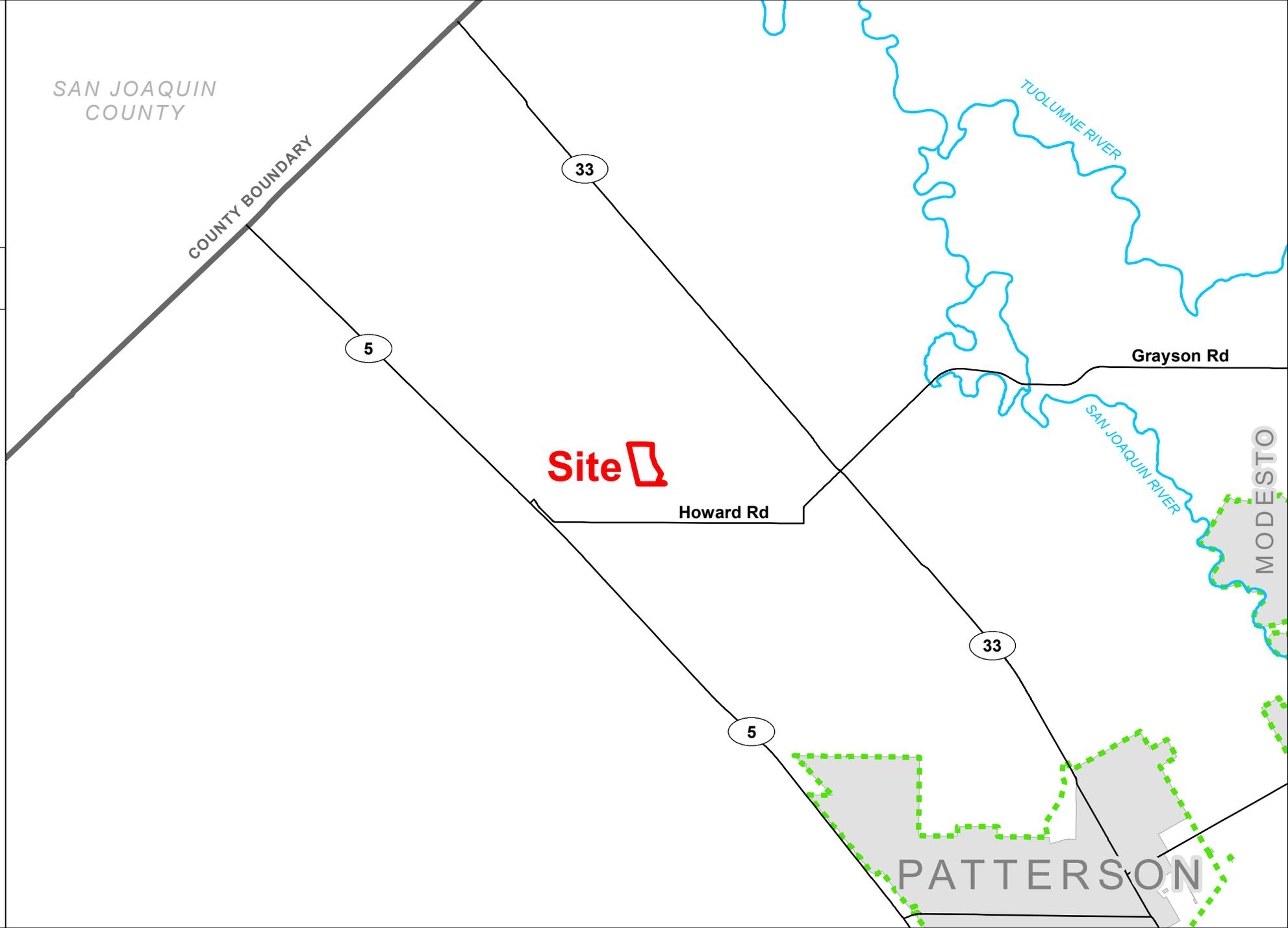
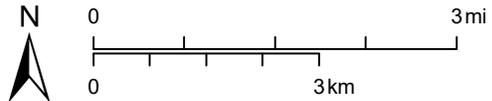
CENTRAL VALLEY GROWERS, LLC

UP & DA PLN2019-0094

AREA MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  City
-  Road
-  River



CENTRAL VALLEY GROWERS, LLC

UP & DA
PLN2019-0094

GENERAL PLAN MAP

LEGEND

 Project Site

 Parcel

 Road

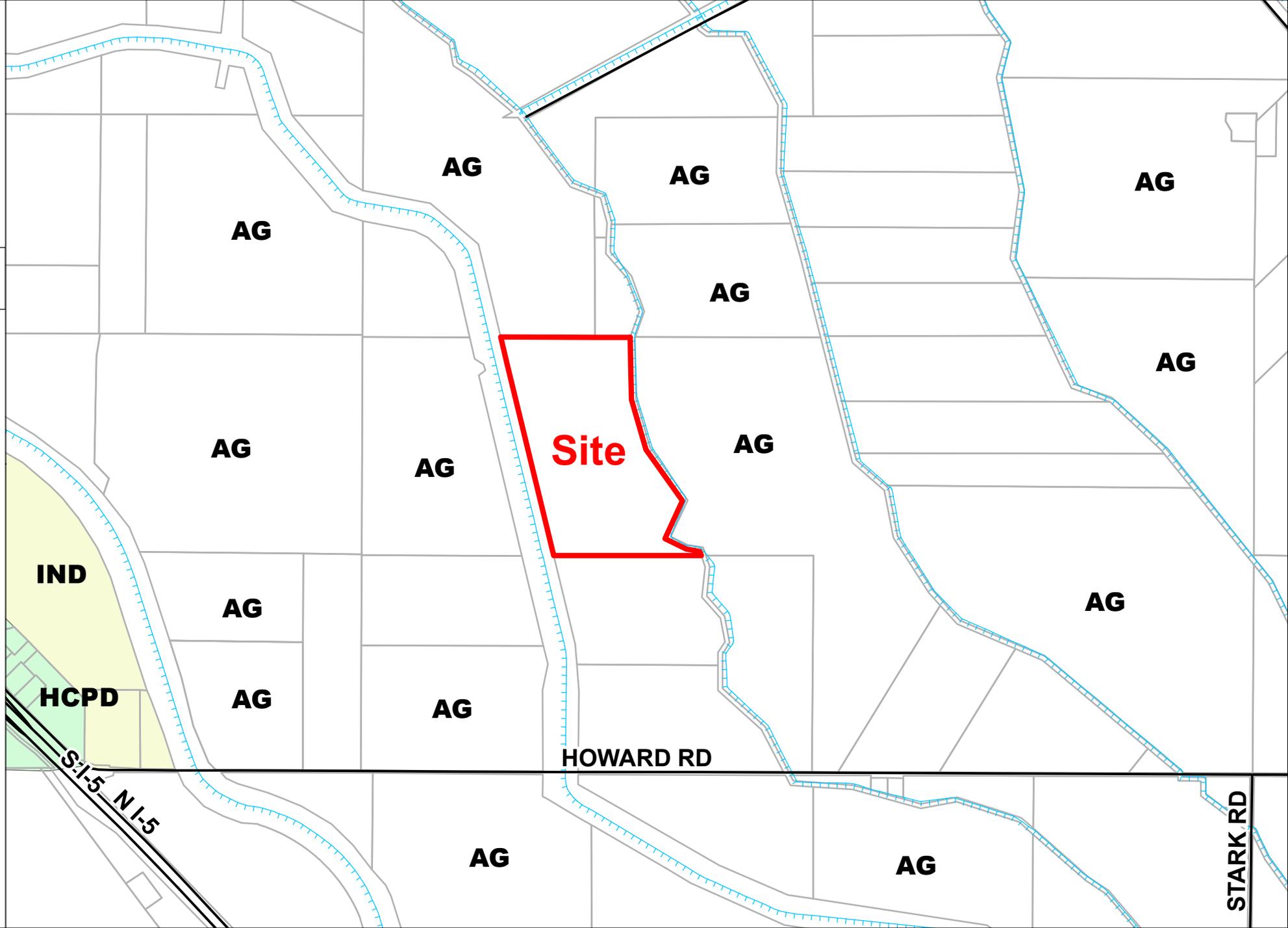
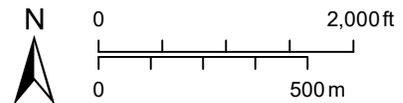
 Canal

General Plan

 Agriculture

 Industrial

 Highway Commercial /
Planned Development



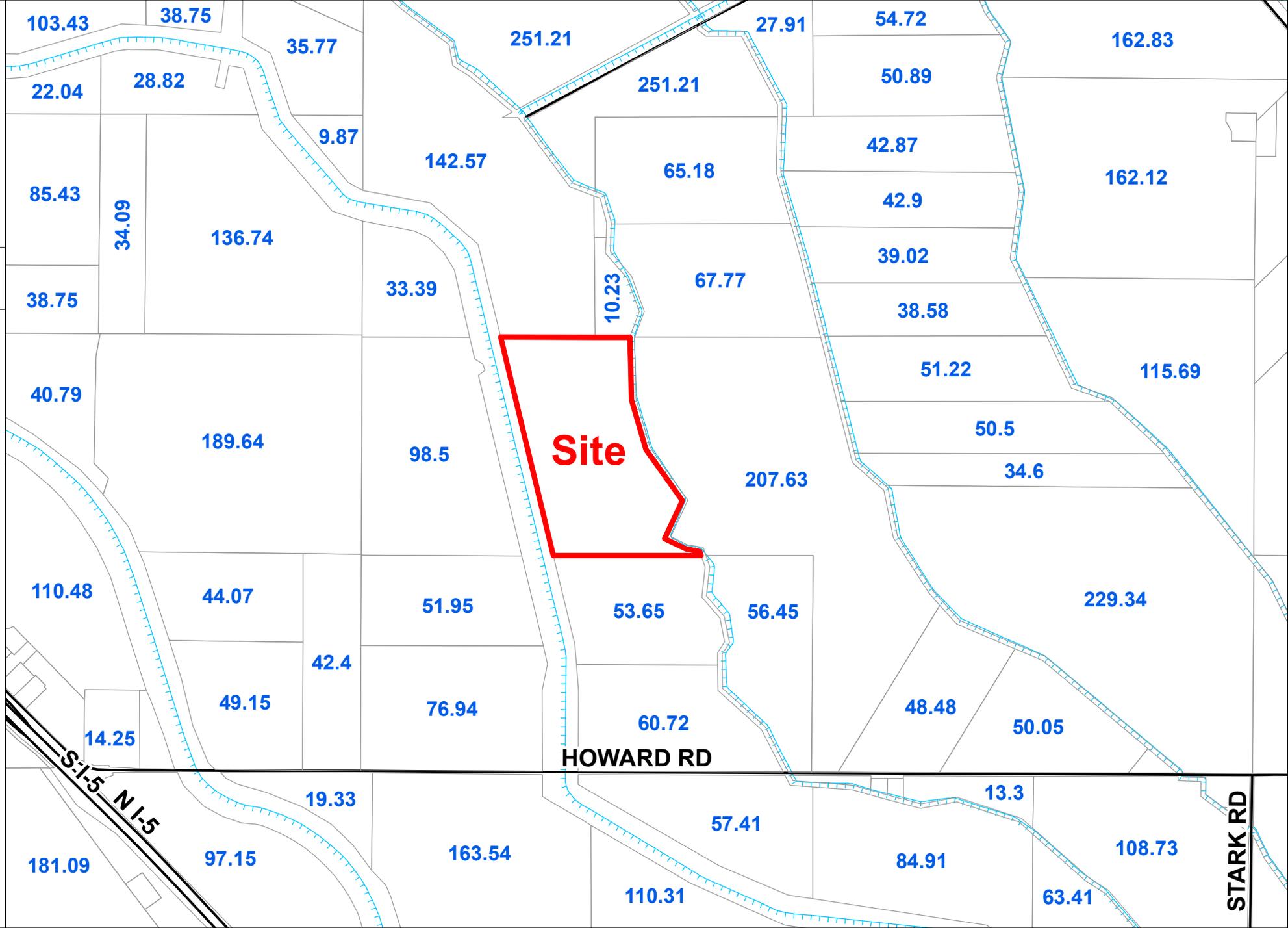
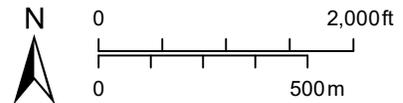
CENTRAL VALLEY GROWERS, LLC

UP & DA PLN2019-0094

ACREAGE MAP

LEGEND

-  Project Site
-  Parcel/Acres
-  Road
-  Canal



STARK RD

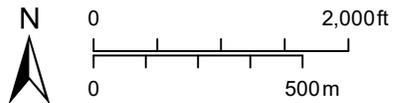
CENTRAL VALLEY GROWERS, LLC

UP & DA
PLN2019-0094

2017 AERIAL AREA MAP

LEGEND

-  Project Site
-  Road
-  Canal



Source: Planning Department GIS

Date: 11/7/2019



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

STARK RD

CENTRAL VALLEY GROWERS, LLC

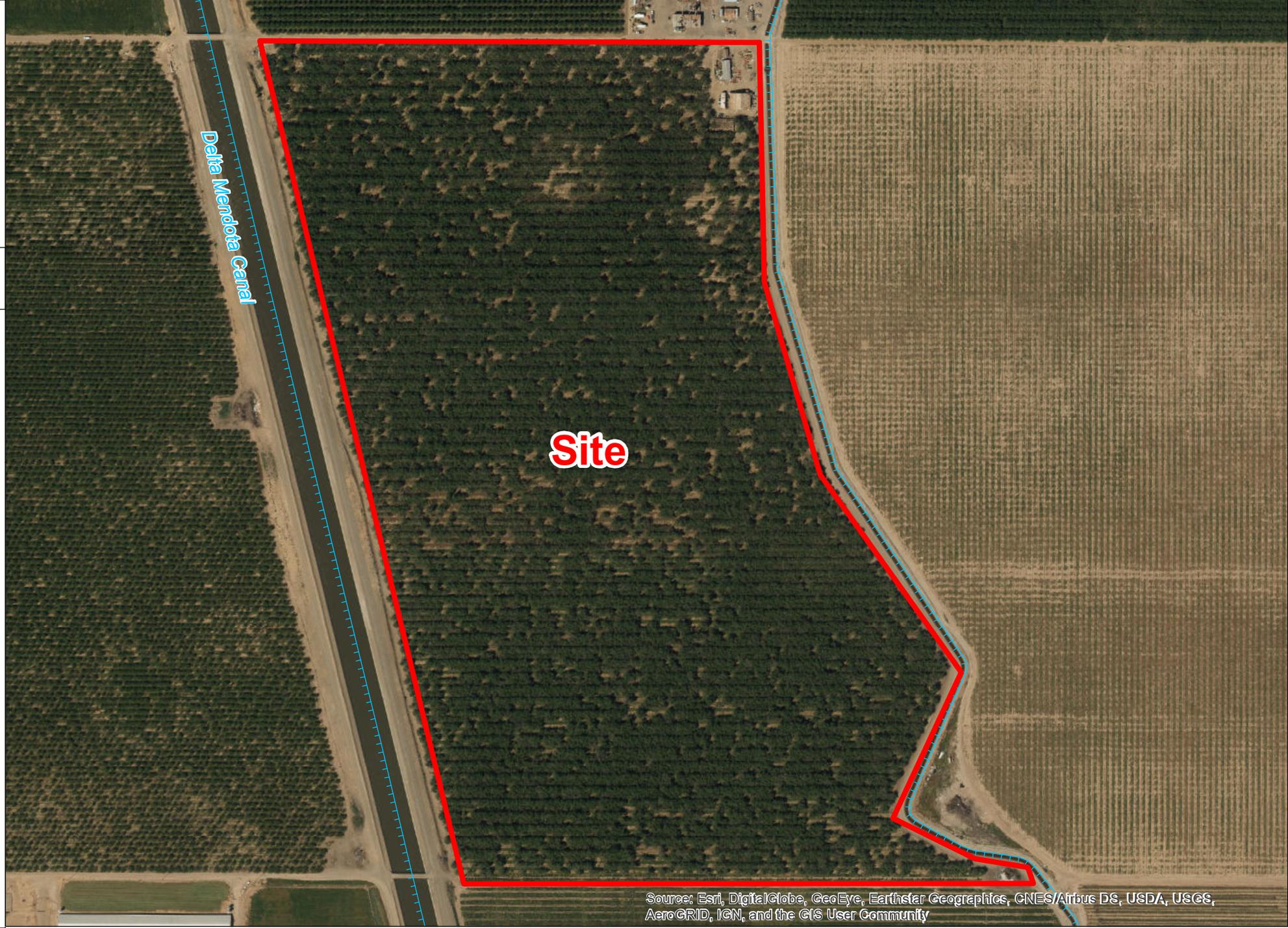
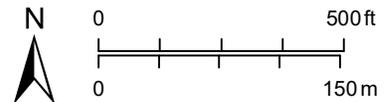
UP & DA
PLN2019-0094

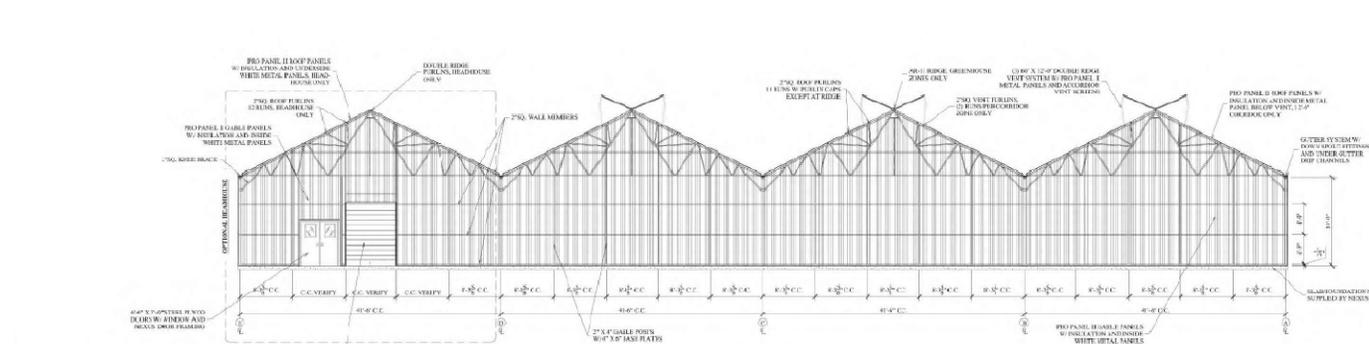
2017 AERIAL SITE MAP

LEGEND

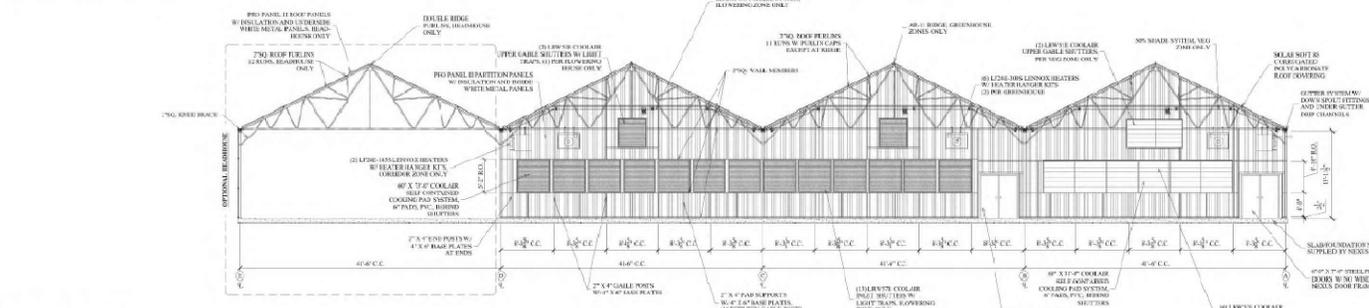
 Project Site

 Canal

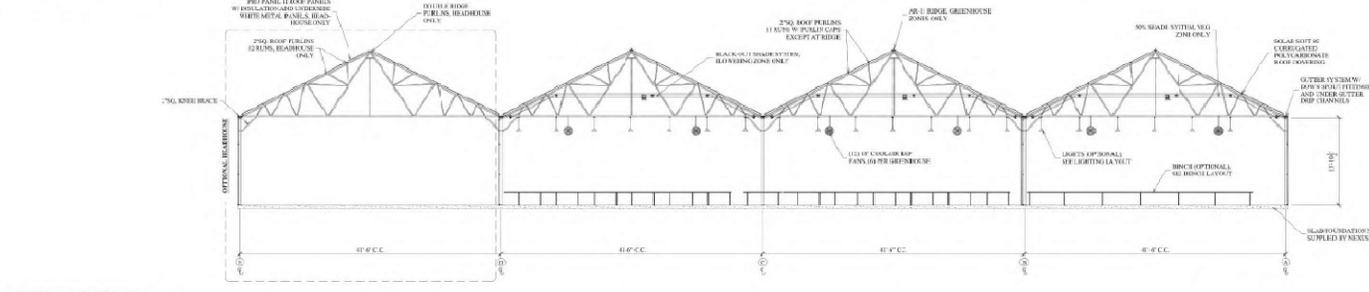




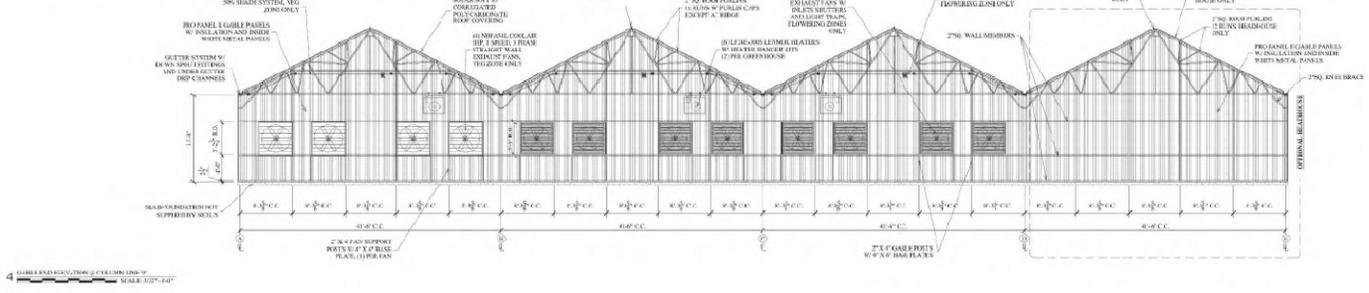
1 OVERALL ELEVATION & COLUMN LINE 1
SCALE 1/8" = 1'-0"



2 PARTIAL ELEVATION & COLUMN LINE 2
SCALE 1/8" = 1'-0"



3 SECTION ELEVATION & COLUMN LINE 3
SCALE 1/8" = 1'-0"



4 OVERALL ELEVATION & COLUMN LINE 4
SCALE 1/8" = 1'-0"

1. DESIGNER IS RESPONSIBLE FOR THE DESIGN OF THE STRUCTURE ONLY. FOUNDATION AND AIR DESIGN ARE THE RESPONSIBILITY OF THE CONTRACTOR OR THE RESPONSIBILITY OF OTHERS.

2. DESIGNER IS RESPONSIBLE FOR THE DESIGN OF THE STRUCTURE ONLY. FOUNDATION AND AIR DESIGN ARE THE RESPONSIBILITY OF THE CONTRACTOR OR THE RESPONSIBILITY OF OTHERS.

3. DESIGN DATA:
2015 INTERNATIONAL BUILDING CODE CHAPTER 16 ASCE 7-10
RISK CATEGORY II
FLOOR LIVE LOAD II - 50 psf
STRUCTURE DEAD LOAD II - 20 psf
ROOF LIVE LOAD II - 20 psf

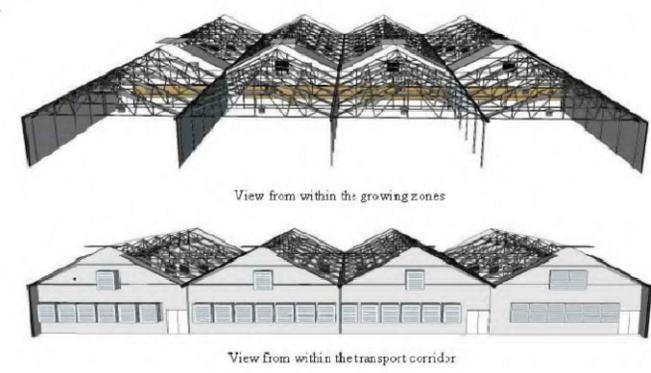
SNOW DESIGN:
AREA AND SNOW LOAD II - 50 psf
SNOW EXPOSURE FACTOR II - 1.0
TERRACE EXPOSURE II - 1.0
ROOF SNOW LOAD II - 50 psf

WIND DESIGN:
ULTIMATE DESIGN WIND SPEED II - 140 mph
NORMAL DESIGN WIND SPEED II - 110 mph
DESIGN CATEGORY II - II
WIND EXPOSURE II - B
INDUCED PRESSURE COEFFICIENT II - 0.85
BASE WIND PRESSURE II - 2.0 psf

SEISMIC DESIGN:
SEISMIC IMPORTANCE FACTOR II - 1.0
SPECTRAL RESPONSE ACCELERATION II - 0.125
SPECTRAL RESPONSE ACCELERATION II - 0.080
SITE CLASS II - S
SPECTRAL RESPONSE COEFFICIENT II - 0.80
SPECTRAL RESPONSE COEFFICIENT II - 0.80
SEISMIC DESIGN CATEGORY II - II
DESIGN BAY SHAPE II - 1.0
RESPONSE MODIFICATION FACTOR II - 1.0
SEISMIC RESPONSE COEFFICIENT II - 0.50
EQUIVALENT LATERAL FORCE PROCEDURE II - 1.0

4. TYPICAL COLUMN AND POST DIMENSIONS ARE CENTER TO CENTER (C-C) FOR MEMBERS UNLESS OTHERWISE NOTED. TYPICAL BAY MEMBER DIMENSIONS ARE FROM GRASS TO TOP OF MEMBER.
C-C - CENTER TO CENTER DIMENSION
O-C - OUT TO OUT DIMENSION
V-H - VERTICALLY IN FIELD
V-C - DIMENSION TO HEIGHT
C-B - COLUMN HEIGHT

5. DEPENDING ON STEEL AND PRODUCT CONDITIONS, SOME FIELD FABRICATION MAY BE REQUIRED, INCLUDING DRILLING CUTTING AND WELDING OF STEEL OR ALUMINUM MATERIALS.



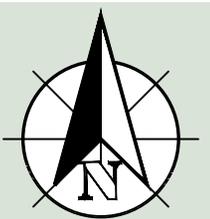
6.0

Proposed Elevations

Central Valley Growers • APN: 016-037-039
Howard N of Road, Patterson CA 93921



Date: January 27, 2020





APPLICATION QUESTIONNAIRE

<p><u>Please Check all applicable boxes</u> APPLICATION FOR: <i>Staff is available to assist you with determining which applications are necessary</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> General Plan Amendment <input type="checkbox"/> Rezone <input checked="" type="checkbox"/> Use Permit <input type="checkbox"/> Variance <input type="checkbox"/> Historic Site Permit </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Subdivision Map <input type="checkbox"/> Parcel Map <input type="checkbox"/> Exception <input checked="" type="checkbox"/> Williamson Act Cancellation <input type="checkbox"/> Other _____ </td> </tr> </table>	<input type="checkbox"/> General Plan Amendment <input type="checkbox"/> Rezone <input checked="" type="checkbox"/> Use Permit <input type="checkbox"/> Variance <input type="checkbox"/> Historic Site Permit	<input type="checkbox"/> Subdivision Map <input type="checkbox"/> Parcel Map <input type="checkbox"/> Exception <input checked="" type="checkbox"/> Williamson Act Cancellation <input type="checkbox"/> Other _____	<p>PLANNING STAFF USE ONLY: Application No(s): _____ Date: _____ S _____ T _____ R _____ GP Designation: _____ Zoning: _____ Fee: _____ Receipt No. _____ Received By: _____ Notes: _____</p>
<input type="checkbox"/> General Plan Amendment <input type="checkbox"/> Rezone <input checked="" type="checkbox"/> Use Permit <input type="checkbox"/> Variance <input type="checkbox"/> Historic Site Permit	<input type="checkbox"/> Subdivision Map <input type="checkbox"/> Parcel Map <input type="checkbox"/> Exception <input checked="" type="checkbox"/> Williamson Act Cancellation <input type="checkbox"/> Other _____		

In order for your application to be considered COMPLETE, please answer all applicable questions on the following pages, and provide all applicable information listed on the checklist on pages i – v. Under State law, upon receipt of this application, staff has 30 days to determine if the application is complete. We typically do not take the full 30 days. It may be necessary for you to provide additional information and/or meet with staff to discuss the application. Pre-application meetings are not required, but are highly recommended. An incomplete application will be placed on hold until all the necessary information is provided to the satisfaction of the requesting agency. An application will not be accepted without all the information identified on the checklist.

Please contact staff at (209) 525-6330 to discuss any questions you may have. Staff will attempt to help you in any way we can.

PROJECT INFORMATION

PROJECT DESCRIPTION: (Describe the project in detail, including physical features of the site, proposed improvements, proposed uses or business, operating hours, number of employees, anticipated customers, etc. – Attach additional sheets as necessary)

**Please note: A detailed project description is essential to the reviewing process of this request. In order to approve a project, the Planning Commission or the Board of Supervisors must decide whether there is enough information available to be able to make very specific statements about the project. These statements are called "Findings". It is your responsibility as an applicant to provide enough information about the proposed project, so that staff can recommend that the Commission or the Board make the required Findings. Specific project Findings are shown on pages 17 – 19 and can be used as a guide for preparing your project description. (If you are applying for a Variance or Exception, please contact staff to discuss special requirements).*

Cannabis will be cultivated on the site as a medium-sized mixed light operation (Type 3B, Tier 2) of 22,000 square feet and a small-sized mixed light operation (Type 2B) of 10,000 square feet. The greenhouse where the premises will be located will be constructed on the property. Additional information is provided in the attached Project Description and architectural plan set.

PROJECT SITE INFORMATION

Complete and accurate information saves time and is vital to project review and assessment. Please complete each section entirely. If a question is not applicable to your project, please indicated this to show that each question has been carefully considered. Contact the Planning & Community Development Department Staff, 1010 10th Street – 3rd Floor, (209) 525-6330, if you have any questions. Pre-application meetings are highly recommended.

ASSESSOR'S PARCEL NUMBER(S): Book 016 Page 019 Parcel 032

Additional parcel numbers: _____

Project Site Address
or Physical Location: Howard N. of Road, Patterson, CA

Property Area: Acres: 90.0 or Square feet: 3,920,400

Current and Previous Land Use: (Explain existing and previous land use(s) of site for the last ten years)
For over a decade, the site has and is currently being used for agricultural purposes

List any known previous projects approved for this site, such as a Use Permit, Parcel Map, etc.: (Please identify project name, type of project, and date of approval)

n/a

Existing General Plan & Zoning: General Agriculture (AG40)

Proposed General Plan & Zoning: _____
(if applicable)

ADJACENT LAND USE: (Describe adjacent land uses within 1,320 feet (1/4 mile) and/or two parcels in each direction of the project site)

East: Agricultural land - open land

West: Agricultural land - Irrigated open land

North: Agricultural land - Irrigated open land

South: Agricultural land - irrigated open land

WILLIAMSON ACT CONTRACT:

Yes No

Is the property currently under a Williamson Act Contract?

Contract Number: 1972-1480

If yes, has a Notice of Non-Renewal been filed?

Date Filed: _____

Yes No

Do you propose to cancel any portion of the Contract?

Yes No

Are there any agriculture, conservation, open space or similar easements affecting the use of the project site. (Such easements do not include Williamson Act Contracts)

If yes, please list and provide a recorded copy: _____

SITE CHARACTERISTICS: (Check one or more) Flat Rolling Steep

VEGETATION: What kind of plants are growing on your property? (Check one or more)

Field crops Orchard Pasture/Grassland Scattered trees

Shrubs Woodland River/Riparian Other

Explain Other: Only crop fruit trees and sparse grasses and weeds exist in project area, no landscape or native trees

Yes No

Do you plan to remove any trees? (If yes, please show location of trees planned for removal on plot plan and provide information regarding transplanting or replanting.)

GRADING:

Yes No

Do you plan to do any grading? (If yes, please indicate how many cubic yards and acres to be disturbed. Please show areas to be graded on plot plan.) _____

Work will also include approximately 2,419.00 cubic yards of grading needed for the building

STREAMS, LAKES, & PONDS:

Yes No

Are there any streams, lakes, ponds or other watercourses on the property? (If yes, please show on plot plan)

Yes No

Will the project change any drainage patterns? (If yes, please explain – provide additional sheet if needed) _____

Yes No

Are there any gullies or areas of soil erosion? (If yes, please show on plot plan)

Yes No

Do you plan to grade, disturb, or in any way change swales, drainages, ditches, gullies, ponds, low lying areas, seeps, springs, streams, creeks, river banks, or other area on the site that carries or holds water for any amount of time during the year? (If yes, please show areas to be graded on plot plan)

Please note: If the answer above is yes, you may be required to obtain authorization from other agencies such as the Corps of Engineers or California Department of Fish and Game.

STRUCTURES:

Yes No Are there structures on the site? (If yes, please show on plot plan. Show a relationship to property lines and other features of the site.)

Yes No Will structures be moved or demolished? (If yes, indicate on plot plan.)

Yes No Do you plan to build new structures? (If yes, show location and size on plot plan.)

Yes No Are there buildings of possible Historical significance? (If yes, please explain and show location and size on plot plan.) Farm was built in 1948

PROJECT SITE COVERAGE:

Existing Building Coverage: _____ Sq. Ft. Landscaped Area: _____ Sq. Ft.

Proposed Building Coverage: _____ Sq. Ft. Paved Surface Area: _____ Sq. Ft.

BUILDING CHARACTERISTICS:

Size of new structure(s) or building addition(s) in gross sq. ft.: (Provide additional sheets if necessary) One new greenhouse
32,000 square feet

Number of floors for each building: One floor for each building

Building height in feet (measured from ground to highest point): (Provide additional sheets if necessary) _____

Building Height 21'

Height of other appurtenances, excluding buildings, measured from ground to highest point (i.e., antennas, mechanical equipment, light poles, etc.): (Provide additional sheets if necessary) _____

None are proposed

Proposed surface material for parking area: (Provide information addressing dust control measures if non-asphalt/concrete material to be used) Gravel Road base will be used in phase I and II implementation; full buildout will upgrade to asphalt

Dust in Phase I and II will be controlled by spraying parking area and access roads with water PRN

UTILITIES AND IRRIGATION FACILITIES:

Yes No Are there existing public or private utilities on the site? Includes telephone, power, water, etc. (If yes, show location and size on plot plan)

Who provides, or will provide the following services to the property?

Electrical: Pacific Gas & Electric Sewer*: Existing/Proposed Septic

Telephone: Fire2Wire Gas/Propane: Pacific Gas & Electric

Water**: Onsite Well Irrigation: Will use permitted well

*Please Note: A "will serve" letter is required if the sewer service will be provided by City, Sanitary District, Community Services District, etc.

**Please Note: A "will serve" letter is required if the water source is a City, Irrigation District, Water District, etc., and the water purveyor may be required to provide verification through an Urban Water Management Plan that an adequate water supply exists to service your proposed development.

Will any special or unique sewage wastes be generated by this development other than that normally associated with resident or employee restrooms? Industrial, chemical, manufacturing, animal wastes? (Please describe:)

Additional waste water runoff from cannabis irrigation, including organic nutrients

Please Note: Should any waste be generated by the proposed project other than that normally associated with a single family residence, it is likely that Waste Discharge Requirements will be required by the Regional Water Quality Control Board. Detailed descriptions of quantities, quality, treatment, and disposal may be required.

Yes No Are there existing irrigation, telephone, or power company easements on the property? (If yes, show location and size on plot plan.)

Yes No Do the existing utilities, including irrigation facilities, need to be moved? (If yes, show location and size on plot plan.)

Yes No Does the project require extension of utilities? (If yes, show location and size on plot plan.)

AFFORDABLE HOUSING/SENIOR:

Yes No Will the project include affordable or senior housing provisions? (If yes, please explain)

RESIDENTIAL PROJECTS: (Please complete if applicable – Attach additional sheets if necessary)

Total No. Lots: _____ Total Dwelling Units: _____ Total Acreage: _____

Net Density per Acre: _____ Gross Density per Acre: _____

<i>(complete if applicable)</i>	Single Family	Two Family Duplex	Multi-Family Apartments	Multi-Family Condominium/Townhouse
Number of Units:	_____	_____	_____	_____
Acreage:	_____	_____	_____	_____

COMMERCIAL, INDUSTRIAL, MANUFACTURING, RETAIL, USE PERMIT, OR OTHER PROJECTS: (Please complete if applicable – Attach additional sheets if necessary)

Square footage of each existing or proposed building(s): Existing buildings: (52832) Approximately 7,888 square feet.

Proposed buildings will include a 39,500 square foot greenhouse and 11,754 square feet warehouse and corridor

Type of use(s): Conditional use permit for cultivation of cannabis (mixed light) and self-distribution-transport-only

Days and hours of operation: 6am to 9pm, daily

Seasonal operation (i.e., packing shed, huller, etc.) months and hours of operation: No seasonal

Occupancy/capacity of building: Maximum occupancy 24 persons. Anticipated maximum use 15 persons.

Number of employees: (Maximum Shift): 15 (Minimum Shift): 2

Estimated number of daily customers/visitors on site at peak time: 2 (no customers, just vendors)

Other occupants: Inspectors

Estimated number of truck deliveries/loadings per day: 0.5 deliveries/day

Estimated hours of truck deliveries/loadings per day: 8 am - 5 pm delivery hours, 0.5 deliveries/day

Estimated percentage of traffic to be generated by trucks: 1%

Estimated number of railroad deliveries/loadings per day: None

Square footage of:

Office area: 0 sq ft Warehouse area: 7,036 square feet

Sales area: 0 sq ft Storage area: 542 square feet-included in warehouse

Loading area: 1,055 sq ft-incl in warehouse Manufacturing area: _____

Other: (explain type of area) Greenhouse - 39,500 square feet, Utility Corridors 4,718 square feet

Yes No Will the proposed use involve toxic or hazardous materials or waste? (Please explain)

ROAD AND ACCESS INFORMATION:

What County road(s) will provide the project's main access? (Please show all existing and proposed driveways on the plot plan)

Howard Road

Yes No Are there private or public road or access easements on the property now? (If yes, show location and size on plot plan)

Yes No Do you require a private road or easement to access the property? (If yes, show location and size on plot plan)

Yes No Do you require security gates and fencing on the access? (If yes, show location and size on plot plan)

Please Note: Parcels that do not front on a County-maintained road or require special access may require approval of an Exception to the Subdivision Ordinance. Please contact staff to determine if an exception is needed and to discuss the necessary Findings.

STORM DRAINAGE:

How will your project handle storm water runoff? (Check one) Drainage Basin Direct Discharge Overland

Other: (please explain) _____

If direct discharge is proposed, what specific waterway are you proposing to discharge to? _____

Please Note: If direct discharge is proposed, you will be required to obtain a NPDES permit from the Regional Water Quality Control Board, and must provide evidence that you have contacted them regarding this proposal with your application.

EROSION CONTROL:

If you plan on grading any portion of the site, please provide a description of erosion control measures you propose to implement.

Standard BMPs including straw mats, properly sloped roads, regular maintenance, water for dust control, covering of all exposed soil piles and revegetation of exposed areas. Construction will only be in dry season.

Please note: You may be required to obtain an NPDES Storm Water Permit from the Regional Water Quality Control Board and prepare a Storm Water Pollution Prevention Plan.

ADDITIONAL INFORMATION:

Please use this space to provide any other information you feel is appropriate for the County to consider during review of your application. (Attach extra sheets if necessary)

See attached supplemental documents.

Type 3B & Type 2B, Tier 2 Mixed Light Cultivation Premises

APN: #016-019-032

Prepared for:
Central Valley Growers, LLC

Project Description



TABLE OF CONTENTS

1a. Site Description.....	1
1b. Operations	1
1c. Implementation and Phasing.....	4
1d. Findings.....	4
1e. Acknowledgments/Authorizations.....	9

1.0 PROJECT DESCRIPTION

1A. SITE DESCRIPTION

The proposed location for Central Valley Growers LLC cannabis operations is the property described as Howard N of Road, in Patterson, Stanislaus County, also identified as Stanislaus County parcel number (APN) 016-019-032-000. The property is zoned General Agriculture (AG40). Land in this area is largely used for cultivation or livestock farming. The site has existing buildings located on the northeast corner of the parcel which are used to house farming equipment and supplies. The nearest offsite buildings are located on the southeast corner of the adjacent farmland parcel to the north. No other buildings are located in close proximity to the site. The property abuts the Delta Mendota Canal on the western border. The property owner from whom the operations are leasing the land also owns approximately 100-105 acres of contiguous land adjacent to the site with associated APNs of 016-019-036-000, and 016-019-040-000 which reduces any conflicts of interest, and provides a greater buffer between the operation and nearby neighbors.

The property is currently in use for producing almonds. The current owner purchased the property, as an investment in 2003 and has consented to allowing our entity to construct and operate our cannabis cultivation operation, pending local and state approvals.

1B. OPERATIONS

Our application is for both a Type 3B and a type 2B Cultivation license, enabling us to grow cannabis with a canopy area of up to 32,000 square feet. As our premises design indicates and depicts, we will be using a prefabricated commercial-grade, professionally designed, and installed mixed light greenhouse. Our proposed facilities will include several attached but distinct buildings including approximately 39,500 square feet of Farmtek prefabricated greenhouses, 4,718 square feet dedicated to utility corridors, and 7,036 square feet of warehouse space. The approximately 42 foot-wide by 180-foot-long greenhouses will include:

- 4,718 square feet of climate-controlled transport corridor;
- 7,500 square feet of climate-controlled vegetative space in three areas;
- 32,000 square feet of climate-controlled flowering space separated into two distinct areas; and
- 7,036 square feet of warehouse space to accommodate for processing, storage and transport.

Each greenhouse will be constructed of:

- Steel square framing for two outside end-walls and two interior end-walls;
- Steel square framing for two exterior sidewalls and two interior sidewalls between the growing zones;
- Galvanized doors and square framing with aluminum perimeter flashing for double doors into the greenhouses and one sliding door leading out of the greenhouse corridor;
- Air intake vents, each five feet by twelve feet;
- Anti-virus insect screening;
- Heaters for each greenhouse room and the corridor;

- Four exhaust fans for each greenhouse room for cooling and dehumidification;
- 50 percent shade/energy curtain system for veg area;
- Double blackout shade/energy curtain for flowering area; and
- Electronic controllers for: ventilation, temperature, and humidity; lighting and light sensors; CO2.

The warehouse will be separated into distinct rooms, including:

- Drying rooms for drying and curing harvested cannabis flowers;
- Trim rooms for trimming, manicuring, and packaging cannabis flowers and trim material;
- Secured shipping and receiving areas;
- Employee locker rooms;
- ADA-compliant bathrooms;
- Storage rooms;
- Clone quarantine/Research and development room;
- Offices and lobby/reception area.

Our operation will employ a maximum of 15 persons when fully implemented. We anticipate operating between the hours of 6am and 9pm daily. Given the nature of our business is the production of cannabis plants, visitors to our property will be limited to employees, occasional vendors, licensed cannabis distributors when there is a need to transport products, and inspectors, police and other public officials.

1C. IMPLEMENTATION AND PHASING

Implementation of the proposed project is anticipated to occur in three phases, as follows:

PREDEVELOPMENT

Prior to any physical development we intend to first obtain a conditional use permit for the project from Stanislaus County, which will satisfy the local approval required by the state. We will then apply for a Type 1B Small Mixed Light cannabis cultivation license from the California Department of Food and Agriculture for the first phase of buildout and simultaneously apply for building permits from the County.

PHASE 1 DEVELOPMENT

Once we have obtained the requisite building permits, we will begin construction of the Phase 1 floor plan, as illustrated on the attached Architectural Plan Set (APS). We anticipate this work to start between July and August of 2020, depending on the County's timing and weather conditions. The total footprint of Phase 1 is 9,735 square feet and is situated on approximately one fifth of the proposed buildout area of 51,254 square feet. Proposed Phase 1 building construction will include 5,000 square feet of greenhouse and an additional 1549 square feet of corridor space in the greenhouse needed for ventilation controls. Phase 1 will also include construction of an additional 3,186 square foot warehouse space, divided into a temporary veg/drying/administrative hold area, a raw materials and cannabis waste storage area, an employee break and changing room, and ADA compliant restrooms.

Associated site improvements will be constructed to facilitate streamlined buildout by year three and will include grading and installation of a graveled parking area and access drives leading to the Access Roads at the east border of the parcel as shown on Sheet 4.0. Work will also include approximately 2,419.00 cubic yards of grading needed for the building footprint, footings, septic system, and drainage detention. Once Phase 1 construction is completed, we anticipate landscaping disturbed areas around the building, detention, parking area, and other exposed earth to prevent erosion as shown on Sheet 7.0. We are proposing this streamlined method of implementation to keep construction costs in check and ease into operation by 2021.

PHASE 2 DEVELOPMENT

Phase 2 will continue construction of the full buildout by expanding the flowering area of the facility to include another 5,000 square feet along with an additional 65 square foot utility corridor. The additional flowering space will be processed through the existing administrative hold, cannabis storage and transport/shipping areas which can be seen on the proposed Plan Set. We anticipate this phase will be implemented in year 2022 and will include construction of an addition to the premises to expand the type 1B license to a Type 2B cultivation operation.

Similar to Phase 1, Phase 2 site improvements will be associated with requirements for the additional building area and include graveled parking for additional vehicles, grading for facilities and additional drainage detention, and landscaping of disturbed areas.

BUILD OUT DEVELOPMENT

Phase 3 development will involve full buildout of our proposed development, as previously described in our operations section. Buildout will involve construction of our fully proposed site and facility as illustrated on the attached Architectural Plan Set. In addition to the facility itself, we will also fully implement our proposed site improvements including final grading for the building pad, parking, and drainage detention, full construction of the parking area including asphalt, access pathways around the building, and landscape installation. Full implementation of our project will involve significant time and resources as well as the expansion of our state licensure to include both 2B and 3B mixed-light cultivation operations. As such we expect this phase to occur in mini-phases where we will continue to develop our operation as return of profits allows us further investment. We intend to keep the county abreast of our continued progress and anticipate full development to occur by 2023.

1D. FINDINGS

In this section we have provided details about the business, the property, current use of the property, operating parameters, compliance with state and local regulations, and other information to help support our application and provide all relevant information to the Planning Commission and the Board of Supervisors.

STATE OF CALIFORNIA CANNABIS REGULATIONS

Our facility layout follows all state cannabis regulations issued by the Department of Food and Agriculture for licensed cultivators. We have specifically highlighted the following findings for state regulations that are related to County land use, development standards, and facility design:

- **Proximity to schools, youth centers, daycare** – Our operation is greater than 600 feet from any school, youth center, or daycare center.

- **License type matched with size and type of operation** – Our operation is consistent with state licensing requirements for cannabis cultivation. Specifically, we are in compliance with all regulations related to Type 3B Mixed Light Tier 2 licenses including limiting the amount of flowering canopy to 10,000 square feet per license and separating each license premises by a wall.
- **Security** – As demonstrated in our Security Plan, our facility and operation will be in full compliance with all security requirements for state cultivator licensees.
- **Public entrance requirement** – Both license premises will be equipped with a public receiving area where our employees will be able to verify credentials of all visitors. Additionally, only designated personnel will be given access to restricted areas.
- **Designated cultivation and processing areas** - CCR Section 8300 of the cannabis cultivation regulations in the following ways:
 - Only cannabis plants maintained within designated flowering canopy areas will be allowed to flower;
 - Harvested cannabis will only be processed in the rooms designated for drying and trimming in our warehouse. Additionally, these rooms will be fitted with sanitary surfaces and equipment to ensure compliance with any regulations related to cannabis processing that may become required by the Department of Public Health, pursuant to CCR Section 8212.

GENERAL PLAN CONSISTENCY WITHIN LAFCO-ADOPTED CITY SPHERE OF INFLUENCE (SOI)

The proposed site location is outside all city spheres of influence. The closest city sphere of influence is the City of Patterson, the border of which begins more than 3.5 miles southeast of the property at Zacharias Road.

USE PERMIT

As agriculture is the leading industry in Stanislaus County, the General Plan – Agricultural Element serves to protect this industry from encroachment of alternative land use development that would either conflict with or reduce the amount of production land available for farming. This is achieved by focusing on the mitigation of negative economic and environmental impacts to agricultural land and the natural resources needed to support local agriculture.

The Stanislaus County General Plan designates our property as General Agriculture (A-2). While our proposed use of mixed light cannabis cultivation (Type 3B Medium Mixed Light Cultivation), including the planting, growing, flowering, and harvesting of the cannabis plant, is not considered an agricultural use, the following discussion demonstrates specific findings of why it is nevertheless compatible with surrounding agricultural policies:

- **Policy 1.1 – Promote the location of new agriculture-related business and industry**
 - Finding - As opposed to other types of land uses such as residential or retail development that would detract from the farming industry in the County, approval of our cannabis operation would in fact satisfy this policy by promoting this newly legal and agriculture-related industry. Similar to other agriculture, cannabis would continue the County’s legacy as a farming community, increase visibility and importance of agricultural uses in the Central Valley, and preserve local culture. Additionally, our approval would reduce development of residential and commercial uses.

- **Policy 1.2 – Encourage marketing and promotion of local agricultural products**
 - Finding – Approval of our cannabis operation would begin to establish a local cannabis industry similar to existing agricultural activities filled. With the apparent demand for legal cannabis in California, this action would increase visibility of existing agricultural identity while also creating a new economically viable industry and identity for the community.
- **Policy 1.3 – Encourage efforts to expand markets for the export of local agricultural products**
 - Finding – Approval of our operation would expand local export of cannabis as a newly legal and highly valuable product for Stanislaus County, thereby satisfying the intent of the Agricultural Element’s focus on economic development. Legal cannabis production and export would greatly increase local taxes, demand for skilled labor and good paying jobs, and indirectly promote other ancillary businesses.
- **Policy 1.4 – Limit visitor-serving commercial uses**
 - Finding – Our cannabis production operation will only be visited by employees, occasional vendors and licensed cannabis distributors, and inspectors, police and other public officials. We anticipate this limited traffic to be similar to surrounding agricultural uses.
- **Policy 1.7 Prevent concentrations of commercial and industrial uses detrimental to the primary use of the land for agriculture**
 - Finding – Our operation is proposed on less than two acres of the property, with continued agriculture use on the remaining portion of the parcel. As opposed to other types of development, our operation is substantially the same as any greenhouse used to produce other types of crops and will be completely sealed from the outside environment. Other than our development area, all topography, soil suitability, crop potential, and irrigation facilities will be maintained to continue to promote agricultural use and character of the land. In addition, our operations will have no negative impacts on agricultural uses in the surrounding area.
- **Policy 1.9 – Protect agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance**
 - Finding – While other types of development would detract from the local agricultural community by creating conflicts with homeowners or commercial business operators, our well-implemented cultivation operation would limit possible nuisance circumstances as follows:
 1. Cannabis production is similar to other agricultural activities with traffic limited to employees, vendors, production transport, and public officials.
 2. Our greenhouse will be sealed, preventing potential spraying or pollination nuisances drifting from or to surrounding properties, as noted in our attached *Air Quality and Odor Control Plan*.
 3. Noise will be contained within the greenhouse, excepting vehicle traffic, and limited to fans, air conditioning, and other related equipment. Additionally noise from surrounding agriculture will not be detrimental to our operation.

4. Odor from our cannabis production will be mitigated as discussed in our Air Quality and Odor Control Plan. Additionally, odor from surrounding agricultural will not affect our operation.
 5. Light emanating from our greenhouse will be blocked from surrounding parcels and the night sky by automated blackout curtains inside, thereby preventing potential light pollution. Additionally, our cultivation lights will only be used from one hour before sunrise till one hour after sunset, provided we are able to maintain a consistent 12-hour photo period for plant production.
 6. Our operation will not affect or be affected by the County's Right-to-Farm ordinance as activities will be substantially similar to other agriculture. Additionally, our operation will not consider surrounding agricultural activities a nuisance.
 7. Our community relations plan discusses how we will respond to any potential complaints from neighbors and provide outreach as educational opportunities to familiarize neighbors with legal cannabis operations.
- **Policy 1.10 – Protect agricultural operations from conflicts with non-agricultural uses by requiring buffers between proposed non-agricultural uses and adjacent agricultural operations**
 - Finding – While our cannabis operation is not considered an agricultural use as defined by the County General Plan, our activities will in fact closely resemble any other surrounding agricultural use that includes a sealed greenhouse. We are therefore not concerned with buffering our proposed use from adjacent agriculture parcels and do not anticipate a need for extensive buffering of our use from surrounding uses. At the same time, we are sensitive to and respect those community members who may oppose the use of cannabis and have therefore included attractive fencing and landscaping around our development to soften any perceived impact. Additionally, our automated blackout curtains will shield any potential light pollution.
 - Policy 1.11 – Support state regulations requiring landowners to manage noxious weeds and pests on fallow or abandoned lands
 - Finding – Approving our cannabis cultivation project would assist in rehabilitating this property as it is currently an abandoned dairy farm. With projected revenues, we plan to work with the property owner to renovate the farm into expanded cannabis related activities with local and state approval, or agricultural uses for our other businesses.
 - **Policy 1.21 – Ensure the safety of food produced in Stanislaus County and maintain a local regulatory framework promoting environmental safety while ensuring the economic viability of agriculture**
 - Finding – While not a food product, our cannabis operation will incorporate both state of the art facilities and compliance with all local and state laws relevant to consumer and workplace safety. As a licensed cannabis cultivator, we will be responsible for cultivating consumable products that pass rigorous testing requirements for cannabis as dictated by the Bureau of Cannabis Control. Additionally, we will incorporate occupational health and safety procedures as demonstrated in our Standard Operating Procedures Manual that are in compliance with our license requirements and

that of CalOSHA.

- **Additional Findings – Exceptions to Local Setback Requirements**

- Finding – As required by the County’s Commercial Cannabis Business Supplemental Application Checklist, all buildings included in our proposed development are located a minimum of 200 feet away from any legal dwelling located on a parcel under different ownership and any library. Additionally, all buildings utilized for commercial cannabis cultivation is setback a minimum of 50 feet from the boundary of any adjoining parcel under different ownership.

- **Nonconforming uses**

- Finding – There are no nonconforming uses for this property.

- **Williamson Act**

- Finding – The property is under a Williamson Act Contract. The county planning department has indicated that a petition for cancellation is not required.

- **Variances**

- Finding – No variances are required for this property.

SUBDIVISION AND PARCEL MAP

- Finding – Our proposed project does not require subdivision or a new parcel map

EXCEPTION

- Finding – Our proposed project does not require any exceptions for approval.

ZONING ORDINANCE REQUIREMENTS

- Finding – Central Valley Growers, LLC is proposing to locate its operations in Stanislaus County, California and anticipates complying with all local laws, rules, and regulations deemed necessary to conduct its business. We intend to comply with Stanislaus County Code (SCC), section 6.78 - Commercial Cannabis Activities, as well as local zoning ordinance 21.20.030 (H) - Commercial Cannabis Cultivation.

SCC CODE CHAPTER 6.78

- Finding – The following findings demonstrate our project’s compliance with Ordinance 1206, approved by the County Board of Supervisors on January 19, 2018, which added Stanislaus County Code (SCC), Section 6.78 - Commercial Cannabis Activities.
 - “Cultivation” is defined as any activity involving the planting, growing, harvesting, drying, curing, grading, or trimming of cannabis. Cultivation includes indoor, mixed-light, natural light, or nursery cultivation. Cultivation outside of a structure is prohibited within Stanislaus County. Within the definition of cultivation, we anticipate applying for one Type 2B, Tier 2 Small-Sized Mixed Light Cultivation license for the purposes of cultivating cannabis plants for the adult use market and one Type 2B, Tier 2 Small-Sized Mixed Light Cultivation license for the purposes of cultivating cannabis plants for the medical use market, enabling us to grow cannabis with a canopy area of up to 20,000 square feet. We will conform to county code and zoning requirements (parking, landscaping, development standards) as noted in our application and business plan.

- We will comply with the State of California and Stanislaus County Agricultural Commissioner’s requirements for unique identifiers and Track and Trace programs. All pesticides and fertilizers will be presented to the County Agricultural Commissioner and will be properly labeled and stored to avoid contamination through erosion, leakage, or inadvertent damage from rodents, pests, or wildlife.
- All cultivation operations will be conducted in accordance with state and local laws related to land conversion, grading, electricity, water usage, water quality, woodland and riparian habitat protection, agricultural discharges, and similar matters. As noted in our *Environmental Benefits Plan*, our operations will minimize the use of water and energy and utilize water and energy conservation measures on the site.
- We will ensure that no cannabis plants are visible from offsite, and all cultivation activities will be fully enclosed by an opaque and secure fence that is approved by the County. All cultivation operations will occur within a fully enclosed greenhouse, which will include light-blocking measures that ensure no light escapes. No cultivation will be conducted outdoors and will all occur indoors within the greenhouse using mixed light. The total canopy size of cultivation will not exceed 20,000 square feet (as required by the Type 2B Cultivation license).
- Our site location allows for our cultivation operations to be discreet and not pose safety or noise concerns for the community. Only employees, inspectors, and the occasional checked-in visitor will ever be in our facility. As noted in our Security Plan, we will have extensive and extremely visible security technology in place. All employees will be required to pass a background check.
- We will publish our company contact information so that neighboring residents who may have questions or concerns can call and reach our security point of contact within 24 hours. From time to time, we anticipate holding an open house for our fellow agricultural operators over the age of 21 to learn about cannabis cultivation.
- As noted in our Air Quality and Odor Control Plan, our facility will employ the latest odor control technology on the market with a proven track record of abating nuisance odors from cannabis businesses. Farmtek, the manufacturer of our prefabricated greenhouse, offers an optional odor control system, Fogco Systems, that uses a high-pressure fog and a scientifically developed essential oil mixture that performs as a true odor neutralizer. This system will reduce any odors so that there is a less than significant concentration of any odors in the vicinity of the property.

1E. ACKNOWLEDGMENTS/AUTHORIZATIONS

CULTURAL RESOURCES REVIEW

We do not anticipate any cultural resources review to be required. Per CEQA requirements, the County will conduct a search for cultural resources on property and we will conduct archaeological survey if needed. We recognize that if further study is required, we will be responsible for any additional costs. We recognize that our application may not be considered complete if a Records Search or Archaeological study is required.

SENATE BILL 18 COMPLIANCE

Because we are not proposing any amendments to the General Plan or Specific Plans and are not proposing land to be designated as open space, we do not anticipate any consultation with California Native American Tribes.

We recognize that our application may not be considered complete if additional consultation with the Tribes is required.

BIOLOGICAL RESOURCES REVIEW

As referenced in our Wetland and Biological Resources Assessment (WBRA), we have conducted a biological review of the site and found that the property is not in critical habitat for state or federal listed species. A review of the California Natural Diversity Data Base maps also found no listed species in the vicinity of the property. Additionally, no wetlands or other waters of the U.S. or State are located in our project area. We do not anticipate requiring further biological resources review, as our study indicates the project will not significantly affect a wetland or biological resource, as defined by the California Environmental Quality Act (CEQA).

STREAMBED ALTERATION AGREEMENT AND U.S. ARMY CORPS OF ENGINEERS JURISDICTION

As noted in our WBRA, no wetlands or other waters of the U.S. or State are located in our project area and we therefore do not require authorization from the U.S. Army Corps of Engineers. As a cannabis cultivator, the State of California does require us to submit a Lake and Streambed Alteration Agreement (LSAA) pursuant to Section 1602 of the California Fish and Game Code from the Department of Fish and Wildlife (CDFW). We anticipate receiving a letter from CDFW indicating a is not required for this project. We will apply for the LSAA prior to applying for our state cannabis license.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – CANNABIS WASTE DISCHARGE REQUIREMENTS

Our project will comply with the State Water Resources Control Board's General Order requiring all cannabis cultivators in California to obtain a Waste Discharge Permit or Waiver. Given that our facility will contain a sealed roof, impervious floor, and will drain wastewater to a County permitted septic system, we anticipate obtaining a Conditional Waiver from the Central Valley Regional Water Quality Control Board. We will obtain this waiver prior to applying for our state cannabis license.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – STORM WATER PERMIT REQUIREMENTS

As our construction activities will result in more than one acre of land disturbance, including clearing, grading, excavating, staging areas, and stockpiles, we recognize that it is our responsibility to apply for a general construction permit from Water Board and will do so before commencing any construction.

STATE OF CALIFORNIA HAZARDOUS WASTE AND SUBSTANCES SITES LIST (C.G.C. § 65962.5)

A review of the latest State of California Hazardous Waste and Substances Sites List on the California State Department of Toxic Substances Control web site (conducted August 22, 2018) found no hazardous waste sites within 1,000 feet of the property.

ASSESSOR'S INFORMATION WAIVER

We recognize that the property owners' signatures on this application authorizes the Stanislaus County Assessor's Office to make any information relating to the current owners assessed value and pursuant to R&T Code Sec. 408, available to the Stanislaus County Department of Planning and Community Development.

WILLIAMSON ACT CONTRACT

During our due diligence process, we researched our obligations to the Williamson Act as the parcel has been under contract since 1973. According to the Stanislaus County Assistant Planner, cancellation of Williamson Act contracts has not been a requirement of Stanislaus County for conditional use permitting of cannabis cultivation. In light of this finding, we are making note that we have determined to the best of our ability that no action is presently needed with regard to the current Williamson Act Contract. Should a petition of cancellation be determined as necessary during the application process, we will gladly prepare the needed documents upon request.

Cultivation, Nursery, and Distribution Premises

APN: #016-019-032

Prepared for:
Central Valley Growers, LLC

Environmental Benefits Plan



TABLE OF CONTENTS

Irrigation	1
Grow media.....	1
Nutrients and pesticides.....	1
Indoor Spraying.....	2
Habitat and Species.....	2
Vegetation and Erosion.....	2
Waste Management	2
Transportation Impacts.....	2
Odor and Air Quality Management.....	3
Lighting and Power.....	3
Energy and Greenhouse Gas Emissions	3

1.0 PROJECT LOCATION

The proposed location for Central Valley Growers LLC cannabis operations is the property located North of Howard Road in Patterson, Stanislaus County, also identified as Stanislaus County parcel number (APN) 016-019-032-000. The property is zoned General Agriculture (AG40). The property is in the heartland of agriculture in the County and well outside (more than ½ mile) from any sphere of influence (SOI) of any incorporated city. Land in this area is largely used for cultivation or livestock farming. The site has existing buildings located on the northeast corner of the parcel which are used to house farming equipment and supplies. The nearest offsite buildings are located on the southeast corner of the adjacent farmland parcel to the north. The Delta Mendota Canal borders the western side of the property. No additional buildings are located in the vicinity. The impact on our surrounding environment has been addressed in several areas of this application, but to highlight our efforts to protect and preserve not only our own environmental quality but also that of our neighbors, please see the summaries below.

2.0 WATER CONSERVATION

We are firmly committed to the use of drip system, which greatly reduces the water usage in cultivation and allows our team to better manage the operation and health of the plants. Our greenhouse system also comes with an optional drip irrigation system complete with pH adjustment/fertilizer dosing systems and inline pH & EC monitoring for 24-hour irrigation zones. We plan to evaluate this system compared to others on the market before making a final decision but are firm on the use of drip irrigation in growing our cannabis crops to conserve water and most efficiently deliver water and nutrients to the plant roots with minimal evaporation.

Additionally, we plan to use innovative soil tension irrigation sensors that are capable of not only assisting with management of water volume, supply, and pumping capacity, but also manage plant stress and optimize plant growth. We have included information on one such system, provided by Hortau Irrigation Systems.

A further advantage of cultivating in our enclosed greenhouse will be the opportunity we have to recapture plant transpiration water vapor in the indoor atmosphere using air conditioning and dehumidifiers. We will also recapture condensate from air conditioner equipment. Both recycled water sources will be pumped back into our irrigation system, resulting in a substantial reduction in the need for ground-sourced well water.

3.0 GROW MEDIA

Our cultivation operation will use coco soilless mix, such as Roots Organics, for growing our cannabis crops. Roots Organics Coco Soilless Mix and similar products are made from high-quality coco fiber/coir that is repeatedly washed to remove any impurities and composted for up to 24 months, then specially blended with extra-long fibers, perlite, and pumice. The mix is then lightly amended with a starter charge of organic fertilizers like bat guano, worm castings, and kelp. The material is environmentally-friendly, as it is made from a by-product, pH stable with the ideal range for nutrient uptake, and its lignin content is slow to decompose.

4.0 NUTRIENTS AND PESTICIDES

We plan to only use organic nutrients that are specially blended for cannabis vegetative growth and flower production. Once we are further along in establishing our operation, we will determine which nutrient lines to use, which may include Hydrofarm, Canna, Botanicare, or Advanced Nutrients, or we may decide to mix our own nutrients from bulk purchases of macro (N-P-K) and micronutrients. Additionally, we may employ the use of, or make our own compost tea. We will not use any nutrient containing inorganic compounds, particularly those prohibited by the Department of Pesticide Regulation, Water Board, or Stanislaus County Agricultural Commissioner.

We will use biological pest controls, such as ladybugs or praying mantids, and organic pest controls, such as neem oil or rosemary oil during crop production. We may also consider other approved controls for certain situations if the need arises. No nutrients or pesticides will be used outside the greenhouse and exterior exhaust fans will not be used during any spraying application, eliminating any concern of drift to outdoor spaces.

5.0 INDOOR SPRAYING

No nutrients or pesticides will be used outside the greenhouse and exterior exhaust fans will not be used during any spraying application, eliminating any concern of drift to outdoor spaces.

6.0 HABITAT AND SPECIES

We prepared a Wetland and Biological Resources Assessment (BRA) which included both remote and onsite surveys and analysis to determine whether our project would impact any regulated waters of the U.S. or State, or federal or state as listed threatened or endangered species. In summary, our conclusion is that no biological impacts to wetlands or federal or state protected special status species will occur because of this project.

7.0 VEGETATION AND EROSION

The current project site is utilized as an almond and young apricot orchard and contains a decommissioned dairy farm. Due to the amount of disturbance from routine agriculture maintenance of disking and mowing for weed abatement, vegetation in the project are consists primarily of sparse annual grasses and weed species. Dominant annual grass species including oats (*Avena* sp.), soft chess brome (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), and perennial ryegrass (*Lolium perenne*). Other grassland species such as black mustard (*Brassica nigra*), prickly lettuce (*Lactuca serriola*), yellow star-thistle (*Centaurea solstitialis*), and filaree (*Erodium* spp) are intermixed with the grasses.

Our landscaped areas will provide vegetative cover for storm water detention and drainage, protect against erosion, and provide further screening of the facilities from the road and adjacent properties in addition to the security fence.

8.0 WASTE MANAGEMENT

We plan on investing in an incredible waste management system that will include a Bokashicycle Marijuana Waste Granulator, or similar system, which we will use to convert any marijuana waste into farm-ready fertilizer inside of our facility thereby reducing landfill volume, transportation expense as well as the related pollution. This fertilizer will then be sold back to cultivators to reduce the amount of new nutrients they need to purchase for production. Waste that is not compost and converted to fertilizer, we will contract with licensed cannabis waste management firms to properly dispose of this waste.

9.0 TRANSPORTATION IMPACTS

Due to the nature of our non-retail business, our green business practices, and limited employee base, we expect a very minimal environmental impact that is also mitigated by the multipurpose site and already established agricultural activities filled. This item is addressed in greater detail in the *Community Benefits Plan* attached to this application as a supplement.

10.0 ODOR AND AIR QUALITY MANAGEMENT

As noted in our supplemental *Air Quality and Odor Control Plan*, we have paid considerable attention to ensuring that our operation will not in any way negatively affect air quality or become an odor nuisance for our neighbors. This will be achieved because our greenhouse will be completely sealed from the outside and air used inside will be pulled through intake filters and exhausted through a specialized ventilation device that neutralizes odor molecules.

11.0 LIGHTING AND POWER

Our facility will use both natural sunlight and artificial light to grow our cannabis crops. When days are long in the summer and the sky is clear, artificial light will hardly be needed for cultivation. In contrast, we intend to use more artificial light from September through April, when the days are shorter and cloudier. We have researched several lighting options with a variety of benefits and drawbacks. Our plan is to begin operations by equipping a portion of the total cultivation area so that we may ease into the market more gradually. Our lighting options range from approximately \$200 to \$1400 per light.

Our most likely scenario will involve the use of light emitting diode (LED) grow lights, which would provide the most efficient light to grow our plants using up to 50% less power than traditional high intensity discharge (HID) lights. Additional these lights only require 1.6 amps of power on a single phase 240-circuit. The most energy-efficient, and costly, option we have found at this point are specially designed LED lights fabricated by Spectrum King LED in Southern California. These lights are specifically designed for use as supplemental lighting in greenhouses with a larger light footprint (Flowering - 8 feet X 8 feet, Veg – 10 X 10 feet), meaning we would need less lights to cover the same area. About 300 flowering lights and 64 veg lights would be needed for our greenhouse based on these lighting footprints, which would require approximately 600 amps on a single-phase 240 circuit. We have preliminarily estimated an additional need for approximately 100 amps for air conditioning, heating,

and ventilation, and an additional load of 200 amps for general facility power. We plan to finetune these estimates with calculations made by an electrical engineer.

As we commence with operations, we may start with using less expensive ceramic metal halide (CDM) and/or in combination with double-ended (DE) high-pressure-sodium (HPS) lights. CDM lighting is a relatively new technology and is approximately 30-40% more efficient than a standard HPS bulb but burns at a very high temperature. DE HPS bulbs are the more traditional, tried and true technology that has been in the cannabis industry for years. These bulbs are much more efficient than the single-ended HPS bulbs they have replaced over the past five to ten years.

12.0 ENERGY AND GREENHOUSE GAS EMISSIONS

Our operation will employ energy conservation measures, such as the use of energy efficient artificial lighting combined with natural light to reduce our greenhouse gas emissions. In compliance with CCR Section 8305 – Renewable Energy Requirements, beginning in 2023 we will demonstrate to CDFA through recordkeeping that our average weighted greenhouse gas emission intensity is lower than the local utility providers' greenhouse gas emission intensity, or purchase carbon offsets or allowances from the California Cap and Trade Auctions or other designated offset options. We may also employ the use of backup generators. In compliance with CCR, Section 8306, any generators rated below fifty (50) horsepower will be:

- Designated as emergency or low use as defined in CCR Sections 93116.2(a) (12) and 93116.2(a), or either
- Meet Tier 3 with level 3 diesel particulate filter requirements pursuant to CCR Section 2432; or
- Meet Tier 4 engine requirements pursuant to CCR Section 2702.

Type 3B & Type 2B, Tier 2 Mixed Light Cultivation Premises

APN: #016-019-032

Prepared for:
Central Valley Growers, LLC

Air Quality and Odor Control Plan



TABLE OF CONTENTS

1a. Introduction	1
1b. Facility Odor Emissions.....	1
1c. Facility Description.....	1
1d. Equipment Features	2
1e. Case studies	3
1f. Odor Mitigation Practices.....	3
1g. Maintenance	5
1h. Complaint Tracking System.....	5

1.0 AIR QUALITY AND ODOR CONTROL PLAN

1A. INTRODUCTION

Central Valley Growers is proposing to locate one type 3B Medium sized adult use mixed light cultivation and one type 2B small medical mixed light cultivation facility at the property located North of Howard Road in Patterson, Stanislaus County,, identified by APN #016-019-032. The property is zoned agricultural and is currently the site of an almond farm. The new 51,254 square-foot building is accessed by way of a private access road coming north from Howard road and additionally, by private access roads to the east and west of the parcel. The building has been designed with a reception space, ADA compliant restrooms, and employee areas as well as utility areas, cultivation processing areas, and storage. The rest of the building is used as a cultivation space, with a total of 32,000 square feet of canopy and 2,500 of veg space dedicated to each flowering area. One transport area is located at the front of the facility on the western corner of the building for secure shipping and receiving.

1B. FACILITY ODOR EMISSIONS

Central Valley Growers will procure the services of a professional greenhouse manufacturer to provide a pre-fabricated building for cultivation, illustrated in the attached Plan Set. The use of the facility will increase as the business methodically ramps up its operations in different phases. Initially, in Phase 1, the facility will operate with only 5,000 square feet of the green house, along with approximately 3,186 square foot warehouse divided into employee areas, ADA compliant restrooms and storage/admin areas and an additional 1549 square feet of corridor space for ventilation and controls. In the second phase, an additional 5,000 square feet of the greenhouse facility will be added along with an additional 65 square feet of space for the ventilation control corridor. At the completion of phase 2 approximately one-half of the full facility will be in use, in its final stage, the entire square footage of the facility and warehouse will be utilized.

1C. FACILITY DESCRIPTION

All cultivation rooms, where cultivation, processing, and secured storage space will occur, will be built as clean rooms, with no air coming in or going out unless a door is being opened or closed. Sensitive rooms that may create more odor than others will be sealed off from the rest of the facility with wall, floor, ceiling, and opening finishes. All air will be exhausted through a fogging system that scrubs any cannabis odor, ensuring that neighbors and the community will not be able to detect any difference from currently present ambient odors.

The following sections describe how air will move from outside into our facility and then back out again without adding any cannabis odor to ambient air. These steps involve:

- Air Intake
- Indoor Circulation
- Air Exhaust
- Odor Control

Please refer to the attached product sheets for specific information on equipment.

ID. EQUIPMENT FEATURES

AIR INTAKE

Our facility will need to draw in fresh air from outside our building to provide a safe working environment for our staff and ensure air inside the building does not become stale. We anticipate this amount of air intake to be small, compared to our exhaust, which will create a negative pressure ventilation system throughout our facility, thereby eliminating any odor leaks as our exhaust fans draw inwards from any leaks and force outgoing air through our air filters.

The outside air will enter the system through a roof or sidewall vent inlet that collects air from a clean outside location. Our air intake will be pushed through a HEPA filter to eliminate any ambient contaminants, including pollen, dust, and mites. This air will then be introduced into the ductwork, where the outside air mixes with the return air and is able to circulate through the facility with the addition of the indoor ventilation system.

INDOOR AIR CIRCULATION

Ventilation and humidity within the building will be controlled with fans and with a central HVAC system. Compressor and blower quantities and sizes will be determined through preparation of improvement plans based on the total volume of air to be conditioned and the amount of heat generated by grow lights, as well as other equipment. Our air conditioning system will provide controls for managing both temperature and humidity in each room, as heat load and climate conditions will vary throughout the various growing stages. Flowering rooms for example generate much more heat and humidity and are significantly larger than vegetative rooms. Drying rooms require controls for quickly exhausting water vapor during the first 72 hours after harvest, but then ventilation needs to be reduced to properly cure the cannabis flowers.

Sensitive rooms, like flowering room, the trim room, and secured storage rooms, that generate more odors than others will be ventilated using a negative pressure system in which more air will be exhausted than is available in the room. High flow fans will pump air from the rooms through the Phat air scrubbing carbon filter and into our ventilation system. The result will be that ALL odorous air will be pushed through the carbon filters, even when the door is opened. (See attached product sheet). As carbon filters gradually decrease in effective odor control over time, we anticipate replacing them every 3-6 months as directed by the manufacturer.

AIR EXHAUST

As air passes through the building, it is circulated to the opposite end wall of the building from where the air intake is located; from there, it is exhausted, ensuring that air introduced into the facility is fresh and clean. Motorized shutters are opened, and the air is pulled into exhaust fans to be expelled from the building. Once the appropriate amount of air has been expelled, the fans shut off and the motorized shutters are closed.

The National Greenhouse Manufacturers Association (NGMA) indicates in its 2010 standards for ventilating and cooling greenhouses that a rate of removal of 8 cfm per square foot of greenhouse floor is sufficient. At our facility, during maximum cooling, air will be exchanged once a minute.

Once air is exhausted from the central air ventilation system through a duct, a high-pressure fog system, created by FogCo, will be used to neutralize odor using a mixture of essential oils. FogCo is a system that produces a high-pressure fog to intercept malodors as they leave the building. Nozzle rings are placed in front of each exhaust vent or duct, allowing the fog to mix with the exhausting air and to neutralize airborne odors. The nozzles are activated every time the exhaust fan is turned on.

The fogging nozzles, along a high-pressure pump, use an atomizing process to create billions of micron sized droplets are produced every minute, creating a fog. As the droplets are suspended and carried into the air flow, they effectively encapsulate all airborne molecules, including cannabis odors. Through a series of chemical reactions (including antagonistic pairing, absorption, adsorption, and pluralistic effects), the essential oils are able to modify the chemical structure of the odor molecule, which in turn neutralizes and eliminates the malodor. This subtractive odor control process has been proven to reduce odor intensity by over 90% compared to other vapor phase technologies that often do not surpass 60%.

As we noted in the beginning of this control plan, as the businesses operations increase, the facility will only utilize 8,417 square feet of the total operations space, including the warehouse. In preparation for this ramp up, the facility will initially be designed with the high-pressure pump that can handle operations at full capacity but will be equipped with only enough tubing and nozzles for the smaller operation. As the operation grows, more tubing and nozzles will be added to handle the increased exhaust load.

CASE STUDIES

We have included case studies as attachments to this plan pertaining to situations in Colorado and Nevada, where cannabis odors were successfully abated to a level satisfactory to residents and the community. The case study involving a medical marijuana grow facility in Pahrump, Nevada evaluated the ability of the Fogco Systems technology to eliminate discernable odor from the operation. In summary, the case study concluded that the system completely abated what was described as a “pungent, earthy, and marijuana-weed-like” odor downwind of the facility. The Fogco System appeared to create a uniform evaporating fog-mist with no free-water droplets observed in the air, nor upon the immediate ground area. Additionally, no odor was detected from 1/8 to 1-mile away on public access roads.

1E. ODOR MITIGATION PRACTICES

Central Valley Growers staff will establish procedures for effectively operating our air quality and odor control systems into our standard operating procedures manual (SOP) and will also incorporate these into staff training. We plan to include the following procedures to ensure that our neighbors and the Crows Landing community will not be affected by any cannabis odors from our facility:

EMPLOYEE TRAINING

Our Operations Manager will be responsible for training and educating all employees about the importance of odor control. Each staff member will be trained initially during our new hire orientation, as follows:

- Each staff member will understand what duties are involved with controlling odor, particularly opening and closing doors;
- Staff will be trained to report all incidents and/or concerns regarding odor to the Operations Manager;
- The Operations Manager will assist with completing and implementing SOPs and employee training task lists to contain and eliminate odor issues;
- On-going monthly team meetings will also serve as in-person staff training to raise awareness and keep open communication between staff and management.

DAILY OPERATIONS

On a daily basis, our staff will help eliminate odors by adhering to the following procedures:

- Each odor control device will be visually inspected on a daily basis and recorded in the room log.
- Each employee working in or around our facility will ensure that all doors are properly closed behind them as they enter or exit.
- As our facility will not have any windows opening onto the cultivation premises, we will not need to worry about the possibility of one being accidentally opened or having a faulty seal. However, our staff will make sure that seals around all doors are checked when entering and exiting so they remain effective at preventing odors from escaping the facility.
- Our Operations Manager will perform daily walk-through inspections and review all completed task lists from employees to make sure these procedures are carried out. Additionally, the manager will walk through both the interior and exterior of the facility on a weekly basis to ensure that all equipment is operating properly and is effective in eliminating odors.
- During periods of trimming and packaging, the Operations Manager will ensure that odors are isolated, contained, and eliminated around the exterior.

RECORDKEEPING SYSTEMS AND FORMS

The Operations Manager will be responsible for oversight of the following logs:

- Central Valley Growers Maintenance and Record Log – Documents checks and replacements of carbon filters, essential oils for the FogCo system, Hepa filter, and door seal
- Central Valley Growers Training Log – Documents the number of training hours involving odor control.
- Central Valley Growers Odor Complaint Log – Documents any complaints involving odor concerns.

Each grow room will have its own set of logs. The Operations Manager will be responsible for recordkeeping, including identifying the units or equipment that has been checked by serial or identification numbers. The log forms will aid in early notification of malfunctions and document any known malfunction reports, repairs, and dates of service.

1F. MAINTENANCE

In addition to relying on our staff and Operations Manager for controlling odor, we also intend to employ regular maintenance in the following manner:

- Our Operations Manager will inspect the interior and exterior on a weekly basis for failures and issues.
- We will schedule regular maintenance intervals for each type of device or equipment based on the manufacturer's specifications. Typically, we expect carbon filters and nozzle spray devices to be recharged or replaced a minimum of every six months. More frequent recharge and replacement may also occur based on the outcome of daily or weekly checks, which will ensure that the nozzles remain functional and unblocked.

1G. COMPLAINT TRACKING SYSTEM

Central Valley Growers will take all precautionary measures to prevent any odor complaints through using adequate odor control measures and performing our regular checks and maintenance. Additionally, we intend to notify our neighbors of our contact information for our Operations Manager and request that they contact him/her directly should they have a complaint regarding odor. The Operations Manager will manage any complaints along with community outreach to ensure that communication is strong and productive. Our manager will also use an Odor Complaint Log to document the following:

- Any odor complaints, including the date and time the odor was discovered;
- The location of the odor source, once it has been discovered;
- Whether any doors were open into the facility during the reported time of the complaint by reviewing our surveillance records; and
- Whether any changes need to be made to address the odor complaint.

Type 3B & Type 2B, Tier 2 Mixed Light Cultivation Premises

APN: #016-019-032

Prepared for:
Central Valley Growers, LLC

Neighborhood Compatibility Plan



TABLE OF CONTENTS

Neighborhood Compatibility Plan.....	1
Neighborhood Improvements	1
Local Jobs	2
Community Support.....	2

1.0 INTRODUCTION

This plan has been prepared in support of the Conditional Use Permit Application for the property located North of Howard Road in Patterson, Stanislaus County, also identified by APN #016-019-032, to demonstrate compliance with the Stanislaus County Code, Section 6.78 – Commercial Cannabis Activities, the local Zoning Ordinance 21.20.030(H) and the CDFA Regulations, Section §8000. CVG members are currently operating other agricultural facilities in the area and have developed a high-level of awareness for the needs of the surrounding neighborhood.

2.0 COMPATIBILITY MEASURES

CVG also recognizes that the stakeholders in the decision to permit legal cannabis activity within Stanislaus County are understandably concerned about the impact of licensed cannabis businesses within its neighborhoods. We believe several factors of our operations should put these fears to rest.

1. **Discreetness** – While certain types of cannabis business, specifically dispensaries, tend to draw a crowd and potential disturbances. Our is designed so as not to draw people’s attention.
2. **Noise** – Our operation will not pose any noise issues for the surrounding land owners. The loudest noise we anticipate will be generated by our exhaust fans. We will make sure that this noise does not exceed 75 decibels, as required by Stanislaus County Ordinance.
3. **Traffic and other external activities** – Due to the nature of our non-retail business, our green business practices, and limited employee base, we expect very little in the way of traffic to and from our operation and will train our staff on the importance of courteous driving within our community. No employees will be allowed to loiter outside our facility
4. **Non-Retail Nature, Limited Access** –Only employees, inspectors, and the occasional checked-in visitor will ever be in our facility.
5. **Enhanced Security** – Unlike a typical agricultural operation, we will have extensive and extremely visible security technology in place that discourages potential break-ins. Every access point to the building will be closely monitored with high definition surveillance cameras capable of recognizing faces and license plates.
6. **Neighbor Complaint Hotline** – We will publish our company contact information visibly outside of our location to serve as a hotline where residents who may have questions or concerns can call and reach our security point of contact within 24 hours, alleviating any potential that these complaints would be directed to city departments or the County sheriff.
7. **Business Open House** – From time to time, we anticipate holding an open house for our fellow agricultural operators over the age of 21 to learn about cannabis cultivation.
8. **Odor** – Our facility will employ the latest odor control technology on the market with a proven track record of abating nuisance odors from cannabis businesses. The chosen manufacturer of our prefabri-

cated greenhouse offers an optional odor control system that uses a high-pressure fog and a scientifically developed essential oil mixture that performs as a true odor neutralizer.

3.0 NEIGHBORHOOD IMPROVEMENTS

In addition to the established and foundational aspects of the CVG operation that will benefit the lives of staff, the economy and surrounding area, improvements to the site will reform the area beyond the scope of a typical agricultural operation. The planned site improvements include maintenance, security monitoring and a dedication to compliance that goes over and above the expected norm. Additional details regarding specific improvements can be found within the supplemental Community Benefits Plan, the Business and Operations Plan, the site Improvement Plans and throughout the application.

4.0 LOCAL JOBS

CVG operations will initially bring roughly six fresh positions to the area offering competitive wages that surpass the current Living Wage of Stanislaus County. As the rollout of cultivation operations continues to expand, we anticipate a greater number of potential positions both permanent and seasonal which will be filled by members of the local community. It is the practice of CVG to give special focus to veteran candidates as a way of giving back to those who sacrificed so much. Additional information on local jobs and employee benefits are outlined in the Labor and Employment Plan also attached to this application.

5.0 COMMUNITY SUPPORT

Community causes are near and dear to the hearts of CVG members who have a special focus on those who are struggling to find opportunities or support their families with inadequate wages and training. CVG supports a local non-profit that provides valuable employment training to farm workers and other individuals from low-income populations. This Central Valley Opportunity Center currently serves a few central valley counties and is considering the potentials of expansion in the future depending on demand. The partnership also donates to the Stanislaus County Children's Crisis center which helps children in need and supports the prevention and mitigation of child abuse. Additional details will be found in the Community Benefits Plan, attached.