

Staff Report to the **Zoning Administrator**

Application Number: 181580

Applicant: Dee Murray

Owner: William Wheeler, JMH Properties

APN: 030-181-53

Site Address: 4000 Cordelia Lane

Agenda Date: June 21, 2019

Agenda Item #: 2

Time: After 9:00 a.m.

Project Description: Proposal to establish a non-retail commercial cannabis manufacturing business (single licensee) to include: Class 2 Manufacturing (non-volatile extraction, infusion) and Class 2 Distribution, within an existing 5,576 square foot warehouse building (Building A). An existing (non-cannabis) warehouse totaling 7,037 square feet (Building B) is located on the same parcel.

Location: Property is located on the north side of Cordelia Lane, approximately 350 feet west of 41st Avenue at 4000 Cordelia Lane (APN 030-181-53).

Permits Required: Commercial Development Permit

Supervisorial District: First District (District Supervisor: John Leopold)

Staff Recommendation:

- Determine that the proposal is exempt from further Environmental Review under the California Environmental Quality Act.
- Approval of Application 181580, based on the attached findings and conditions.

Project Description & Setting

The subject parcel is located on the north side of Cordelia Lane, in a commercially-zoned area. Cordelia Lane is located to the west of 41st Avenue, within the greater upper 41st Avenue commercial corridor. 41st Avenue is an arterial north-south thoroughfare along which a wide variety of commercial uses are located including industrial, manufacturing, and retail uses; providing commercial goods, services, and employment at a regional scale.

Primary access to the project site is provided via Cordelia Lane. Cordelia Lane is a short eastwest street, measuring approximately 400 feet in total. Cordelia Lane begins at its intersection with 41st Avenue and terminates at the San Lorenzo Lumber property (APN 030-181-79) to the west. The San Lorenzo Lumber property abuts the subject parcel along both the western and northern property boundaries. An automotive repair shop (d.b.a. Stuart Automotive) is located

> **County of Santa Cruz Planning Department** 701 Ocean Street, 4th Floor, Santa Cruz CA 95060

APN: 030-181-53

Owner: William Wheeler, JMH Properties

across Cordelia Lane to the south of the subject parcel. Abutting the parcel to the east is a restaurant (d.b.a. Peking Restaurant) and a vacant commercial building.

The subject parcel is developed with two one-story warehouse buildings, sited in an L-shape. The project would occupy an existing warehouse building (referenced here and in the project application as Building A) bordered by the western parcel boundary and the Cordelia Lane rightof-way to the south.

An existing flooring company (d.b.a. Bay Area Floors) (referenced here and in the project application as Building B) occupies a warehouse building located along the northern property boundary of the subject lot. Building B measures approximately 7,037 square feet and is used as a storage warehouse for the flooring company. Customers of the flooring company are currently not allowed in the warehouse.

The project site also includes an existing asphalt surface parking lot with a total of 17 vehicle parking spaces: five spaces (including one ADA space) are sited adjacent to Building A, three spaces are adjacent to Building B, and nine spaces are sited along the eastern property line.

The project proposes a non-retail commercial cannabis manufacturing business (single licensee) to include: Class 2 Manufacturing and Class 2 Distribution, within an existing 5,576 square foot warehouse building (Building A) for which a (Level 5) Commercial Development Permit is required in the C-2 (Community Commercial) zone district.

Program Statement

The project would include 3,427 square feet of manufacturing space, 1,375 square feet of storage space, and 888 square feet of office space. The manufacturing operation will produce the following cannabis products: packaged flowers, pre-rolls, infused pre-rolls, tinctures, vape cartridges, and topicals (e.g. body/beauty products). Eventually, the manufacturing operation may also produce edibles as the business expands. The manufacturing operation will use ethanol (alcohol, nonvolatile) or a mechanical press (solventless, nonvolatile) to perform extraction. The manufacturing equipment would include a centrifuge, rotary evaporators, and a distillate station. The raw materials would include cannabis, shea butter, plant-based oils, glycerin, and other herbs. There will be no retail activities at this facility, nor will it be open to the public.

The business would initially employ 12 people, split evenly over morning and swing shifts (i.e., between 9:00 a.m. and 12:00 a.m.), and future expansion to 18 employees could occur with the addition of a graveyard shift, increasing the operating hours to 24 hours per day.

Zoning & General Plan Consistency

The subject property is an approximately 37,069 square foot lot, located in the C-2 (Community Commercial) zone district, a designation which allows non-retail commercial cannabis manufacturing uses. The proposed non-retail commercial cannabis manufacturing use is a conditionally permitted use within the zone district and the zoning is consistent with the site's C-C (Community Commercial) General Plan designation.

APN: 030-181-53

Owner: William Wheeler, JMH Properties

Non-Retail Commercial Cannabis Uses

All non-retail commercial cannabis uses, including commercial cannabis manufacturing and distribution are required to obtain a local license required by SCCC Chapter 7.128 as well as a State license required under California State law. The proposal meets definitions of Class 2 Manufacturing and Class 2 Distribution license types as defined by SCCC Chapter 7.128. It is the responsibility of the applicant to comply with State law license requirements.

The subject site is located within one mile of the Coastal Zone; therefore, SCCC Sections 13.10.650(B)(2) and 13.10.650(D)(2)(a) prohibit new non-retail commercial cannabis structures and require that new non-retail commercial cannabis uses be located within existing legal structures. The proposed non-retail commercial cannabis use would occupy an existing legal structure, built in 1961 per Building Permit No. 10375 (Exhibit I).

A Best Management and Operational Practices Plan (BMOP) is required for any new non-retail commercial cannabis use. The Applicant has submitted a BMOP (Exhibit J) that addresses all the required criteria pursuant to SCCC Section 13.10.650(B)(3). Of note, the submitted BMOP addresses security, lighting, operations, odor control measures, water management, waste management, and energy efficiency.

Pursuant to SCCC Section 13.10.650(B)(7), the Applicant has indicated the location of all outdoor lighting fixtures on the submitted site plan (Exhibit D) and has specified that all illumination will be directed downward or shielded so that glare is not projected onto adjacent properties or skyward.

Pursuant to SCCC Section 13.10.650(D)(2)(g) in the C-2 zone district, commercial cannabis manufacturing is only allowed in conjunction with a licensed dispensary, unless a finding is made, upon recommendation of the Cannabis Licensing Official, that a proposed stand-alone manufacturing facility is consistent with the General Plan and is compatible with and will not adversely affect surrounding uses. The Cannabis Licensing Official has submitted a letter (Exhibit K) indicating that the required findings have been met and has recommended approval of the project.

Pursuant to SCCC Section 13.10.650(D)(3) no cannabis manufacturing facility may be located within 600 feet from a school, a day care center, or a youth center. The applicant has submitted documentation (Exhibit L) indicating that the proposed facility is not located within 600 feet of any of these sites and is therefore sited appropriately. No exceptions from the requirements of SCCC Section 13.10.650(D)(3) are being sought as part of this project.

Key Issues

Parking and Traffic

The parking lot contains a total of 17 parking spaces. Based on the County Code which requires one parking space for every 600 square feet of manufacturing area (with storage and loading areas deducted), the facility would require seven parking spaces. The adjacent non-project related Building B also has a parking requirement of approximately seven spaces (one space per

Application #: 181580

Page 4

APN: 030-181-53

Owner: William Wheeler, JMH Properties

1,000 square feet of warehouse area). Thus, the available parking meets and exceeds the County's parking requirement. In order to avoid occupying any of the (seven) spaces required for the non-project related use in Building B, the project has been conditioned to not occupy more than 10 spaces at any one time. Per correspondence received on May 20, 2019 (Exhibit Q), the Applicant indicated rides or bus passes to and from work would be offered to employees if parking demand ever exceeded 10 parking spaces.

In addition to meeting parking requirements, the application included a traffic analysis letter (Exhibit M) to estimate traffic impacts associated with the proposed use. The traffic analysis accounted for the expected future expansion to 18 employees and a 24 hour-per-day operation. The analysis estimates the project would generate a total of 44 daily trips (seven morning peak hour trips and six evening peak hour trips) and 12 daily trips for the non-project related use in Building B. In total the project and Building B are anticipated to generate a total of 56 daily trips, with nine trips (six in, three out) during the morning peak hour and eight trips (three in, five out) during the evening peak hour. The estimated number of trips indicates that a full traffic study is not required (as less than 20 evening peak trips would be generated) and that the proposed use is not expected to significantly impact traffic on adjacent roads or intersections.

To further reduce parking demand and traffic impacts, the submitted BMOP identifies Transportation Demand Measures (TDM) such as commuter benefits and incentives for employees to rideshare, bike, or take public transportation to work. The project will also provide two Class A bicycle parking racks (four bicycle parking spaces), meeting Code requirements (SCCC Section 13.10.552) and further encouraging alternative transportation methods.

Distribution

Pursuant to SCCC Section 13.10.650(E)(1), cannabis distribution pursuant to a Class 2 license associated with commercial cannabis manufacturing may be permitted in any zoning district in which commercial cannabis manufacturing is also authorized; therefore, as Class 2 commercial cannabis manufacturing is permitted in the C-2 zone district, Class 2 cannabis distribution license is likewise permitted.

The project intends to use its distribution license to arrange for laboratory testing of its manufactured cannabis products, provide transportation of its cannabis products from a cultivation facility to its manufacturing facility, store its cannabis products before and after laboratory testing, and arrange for a third party distributer to transport its cannabis products to licensed retailers. Deliveries to and from the site are expected to occur a total of three times per week during operating hours only, and would not occur between 8:00 a.m. to 9:00 a.m. in order to not interfere with access to the adjacent Building B. The delivery of cannabis flowers, trim, and waste are anticipated to be delivered via box truck. Per the submitted odor control plan (Exhibit O), measures are in place to ensure no odor will be detected as a result of the delivery process.

Odor Control

In compliance with SCCC Section 13.10.650(B)(19), the Applicant has prepared and submitted an odor abatement plan for the County Cannabis Licensing Office review and approval. The submitted odor control plan indicates that the proposed non-retail commercial cannabis use will

Application #: 181580

Owner: William Wheeler, JMH Properties

Page 5 APN: 030-181-53

not produce odors that leave the facility's property line. The odor control system will include installation of a negative air pressure ventilation system that routes all exhaust air leaving the facility's manufacturing areas through charcoal activated filters. The odor control plan provides odor abatement measures for identified odor-emitting activities.

A third party Licensed Mechanical Engineer, Scott Shelton, submitted a review letter of the odor control system (Exhibit N). The letter concludes that the proposed odor control methods will result in little to no odors extending beyond the property line. In addition to the implementation of the submitted odor control plan, the proposed non-retail commercial cannabis use is required to apply for, and maintain, an air quality permit from the Monterey Bay Air Resources District (MBARD). MBARD is responsible for the issuance of air quality permits for stationary equipment which may emit air or odorous pollutants. Any abatement device which may reduce or eliminate air contaminants is also subject to MBARD permit requirements.

Security

The submitted security plan was reviewed by the sheriff assigned to the Cannabis Licensing Office. To ensure the security plan is not compromised by making its details public, the sheriff will retain the detailed security plan; however, the security plan includes detailed security procedures, a lighting plan, video surveillance, site security measures, a security floor plan, including secured cannabis and cannabis product storage, and transportation/delivery security.

Sustainable Santa Cruz County Plan Focus Area

The Sustainable Santa Cruz County Plan (SSCC) is a planning study that was "accepted" by the Board of Supervisors on October 28, 2014. The SSCC Plan does not serve as a policy document, as its principles and recommendations would need to be incorporated in the General Plan and County Code in order to become effective; however, it is a visioning document that may become an official policy document within the next few years.

Per the SSCC Plan, the project site falls within the Upper 41st Avenue Focus Area in a proposed Workplace Flex designated area (Page 7-14, Figure 7-9 of the SSCC). The Workplace Flex designation would allow for a variety of employment uses, including offices, research and development, and high tech uses to encourage the development of high-quality job centers that accommodate employee-serving businesses such as restaurants and other small commercial services (SSCC Page 8-4). A cannabis manufacturing and distribution facility that would create 12-18 new jobs is not a dense employment use; however, it is a new employment use that would create high-quality jobs, which is consistent with the Workplace Flex designation.

The SSCC identifies a new vehicular and multi-modal extension between Cordelia Lane and Research Park Court that would ultimately connect 41st Avenue with South Rodeo Gulch Road (Page 4-33, Figure 4-11 and Page 7-15, Figure 7-10 of the SSCC); therefore, a condition has been added that any future development not be permitted to encroach into the adjacent Cordelia Lane right of way to allow for possible future right of way improvements.

Conclusion

As proposed and conditioned, the project is consistent with all applicable codes and policies of

Application #: 181580

APN: 030-181-53

Owner: William Wheeler, JMH Properties

the Zoning Ordinance and General Plan/LCP. Please see Exhibit "B" ("Findings") for a complete listing of findings and evidence related to the above discussion.

Page 6

Staff Recommendation

• Determine that the proposal is exempt from further Environmental Review under the California Environmental Quality Act.

• APPROVAL of Application Number 181580, based on the attached findings and conditions.

Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Department, and are hereby made a part of the administrative record for the proposed project.

The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.sccoplanning.com

Report Prepared By: Jonathan DiSalvo

Santa Cruz County Planning Department

701 Ocean Street, 4th Floor Santa Cruz CA 95060

Phone Number: (831) 454-3157

E-mail: jonathan.disalvo@santacruzcounty.us

Exhibits

- A. Categorical Exemption (CEQA determination)
- B. Findings
- C. Conditions
- D. Project plans
- E. Assessor's, Location, Zoning and General Plan Maps
- F. Parcel information
- G. Water Service Will-Serve Letter
- H. Sanitation Will-Serve Letter
- I. Legal Structure Analysis
- J. Best Management and Operational Practices Plan (BMOP)
- K. Cannabis Licensing Office Policy Findings Letter
- L. Siting Study (600 foot Setback)
- M. Traffic Analysis Letter
- N. Odor Control Review Letter
- O. Odor Control Plan
- P. Noise Analysis
- Q. On-Site Parking Correspondence
- R. Comments & Correspondence

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

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

Application Number: 181580 Assessor Parcel Number: 030-181-53 Project Location: 4000 Cordelia Lane
Project Description: Proposal to establish a non-retail commercial cannabis manufacturing business (single licensee) to include Class 2 Manufacturing (non-volatile extraction, infusion) and Class 2 Distribution within an existing 5,576 square foot warehouse building.
Person or Agency Proposing Project: Dee Murray
Contact Phone Number: (831) 475-5334
A The proposed activity is not a project under CEQA Guidelines Section 15378. B The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c). C Ministerial Project involving only the use of fixed standards or objective measurements without personal judgment. D Statutory Exemption other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).
E. X Categorical Exemption
Specify type: Class 1 - Existing Facilities (Section 15301)
F. Reasons why the project is exempt:
This project proposes to use an existing warehouse to operate a non-retail commercial cannabis manufacturing (Class 2 Manufacturing (non-volatile extraction, infusion) and Class 2 Distribution), within an existing 5,576 square foot warehouse building.
In addition, none of the conditions described in Section 15300.2 apply to this project.
Jonathan DiSalvo, Project Planner Date:

Owner: William Wheeler, JMH Properties

Commercial Development Permit Findings

1. That the proposed location of the project and the conditions under which it would be operated or maintained will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public, and will not result in inefficient or wasteful use of energy, and will not be materially injurious to properties or improvements in the vicinity.

This finding can be made, in that the Class 2 non-retail commercial cannabis manufacturing and Class 2 distribution facility would be located in an area designated for commercial uses.

The Cannabis Licensing Official has reviewed the application and recommends approval of the project for the following reasons: the proposed facility is consistent with the General Plan, is compatible with and will not adversely affect the surrounding area as detailed in SCCC Section 13.650(D)(2)(g), and every cannabis business is required to obtain a license from the Santa Cruz County Cannabis Licensing Office, subject to annual renewal, and any violation of state or local laws may result in revocation or denial of license renewal. Additionally, the security plan has been reviewed and accepted by the County Sheriff's Office. Given these considerations, the project and the conditions under which it would be operated will not be detrimental to the health, safety, or welfare of persons in the neighborhood or general public. In addition, the use will not be materially injurious to properties or improvements in the vicinity; odor control has been reviewed by a licensed professional, and a security plan has been submitted and accepted by the County Sheriff.

All tenant improvements will comply with prevailing building technology, the California Building Code, and the County Building ordinance to ensure the optimum in safety and the conservation of energy and resources.

2. That the proposed location of the project and the conditions under which it would be operated or maintained will be consistent with all pertinent County ordinances and the purpose of the zone district in which the site is located.

This finding can be made, in that the proposed location of the non-retail commercial cannabis manufacturing and distribution facility and the conditions under which it would be operated or maintained will be consistent with all pertinent County ordinances and the purpose of the C-2 (Community Commercial) zone district as the primary use of the property will be one Class 2 commercial cannabis manufacturing and Class 2 distribution facility.

3. That the proposed use is consistent with all elements of the County General Plan and with any specific plan which has been adopted for the area.

This finding can be made, in that the proposed non-retail commercial cannabis manufacturing use is consistent with the use requirements specified for the C-C (Community Commercial) land use designation in the County General Plan. Per SCCC Section 13.10.650(D)(1), Class 2 cannabis manufacturing uses are permitted uses in the C-2 (Community Commercial) zone district, which is an implementing zone district of the C-C General Plan designation. Land designated as C-C is intended to provide a location for commercial services in areas having adequate access and public services where the impacts of noise, traffic, and other nuisances and

Owner: William Wheeler, JMH Properties

hazards associated with such uses will not adversely affect other land uses. This application proposes a commercial use in a location with nearby access to the 41st Avenue corridor and Highway 1. An analysis of the anticipated noise levels associated with the project was submitted (Exhibit P). The project is expected to be compliant with the standards set forth in the Noise Element (Policies 6.9.1 through 6.9.4) of the General Plan and SCCC Chapter 8.30. Noise generated from the project is not anticipated to be an issue given the fact that the use occurs entirely indoors, and the subject parcel is located within a commercial district and is surrounded by commercial uses.

A specific plan has not been adopted for this portion of the County.

4. That the proposed use will not overload utilities, and will not generate more than the acceptable level of traffic on the streets in the vicinity.

This finding can be made, in that the proposed use is to be located within an existing building. Per the submitted traffic impact analysis letter (Exhibit M), the expected level of traffic generated by the proposed project is anticipated to be 44 daily trips, with seven trips (five in, two out) during the morning peak hour and six trips (two in, four out) during the evening peak hour. The submitted analysis utilized the ultimate employee count of 18 employees to quantify the project trip generation, thus accounting for projected traffic demands. The traffic impact analysis letter also analyzed the traffic generated by the non-project related Building B. The analysis concluded Building B would generate an estimated 12 daily trips, with two trips (one in, one out) during the morning peak hour and two trips (one in, one out) during the evening peak hour; therefore, in total the project and Building B are anticipated to generate a total of 56 daily trips, with nine trips (six in, three out) during the morning peak hour and eight trips (three in, five out) during the evening peak hour. Such an increase is not expected to adversely impact existing roads or intersections in the surrounding area. Given the site's location near an arterial roadway (41st Avenue) and a highway (Highway 1), the facility is not anticipated to have a significant impact on the existing roads or intersections in the surrounding area.

The project site is currently served by the Santa Cruz County sanitary sewer service, Santa Cruz City water service, and PG&E/Monterey Bay Community Power. All tenant improvements are required to comply with the requirements set forth by the respective utility providers.

5. That the proposed project will complement and harmonize with the existing and proposed land uses in the vicinity and will be compatible with the physical design aspects, land use intensities, and dwelling unit densities of the neighborhood.

This finding can be made, in that the proposed commercial Class 2 cannabis manufacturing and Class 2 distribution use is located in a neighborhood containing a variety of commercial uses and the proposed use is consistent with the land use intensity of the neighborhood. The project meets the siting criteria per SCCC Section 13.10.650(D)(3) and is not located within 600 feet from a school, day care center, or youth center. The proposed use will occur entirely within an existing building, and with the odor control and security requirements for this project, neither is anticipated to be an issue for adjacent land uses. No expansion of the building is proposed. Minor exterior alterations proposed for the east-facing façade will allow for required doors and loading functions, and all proposed alterations are compatible with the commercial physical design characteristics of the neighborhood. No dwelling units are proposed.

Owner: William Wheeler, JMH Properties

6. The proposed development project is consistent with the Design Standards and Guidelines (sections 13.11.070 through 13.11.076), and any other applicable requirements of this chapter.

All commercial construction is subject to the County's Design Standards and Guidelines. In this case, no new structures or additions are proposed. The proposed modifications to the building façade are architecturally compatible with surrounding properties. The project includes landscaping and minor site improvements to the adjacent parking lot. The project will enhance the aesthetic qualities of the surrounding properties and will not reduce or visually impact any available open space in the surrounding area.

Owner: William Wheeler, JMH Properties

Conditions of Approval

Exhibit D: Project plans, prepared by Derek Van Alstine, dated March 19, 2019.

- I. This permit authorizes the conversion of an existing 5,576 square foot warehouse to establish a non-retail commercial cannabis manufacturing business (single licensee) to include: Class 2 Manufacturing (non-volatile extraction, infusion) and Class 2 Distribution, as indicated on the approved Exhibit "D" for this permit. This approval does not confer legal status on any existing structure(s) or existing use(s) on the subject property that are not specifically authorized by this permit. Prior to exercising any rights granted by this permit including, without limitation, any construction or site disturbance, the applicant/owner shall:
 - A. Sign, date, and return to the Planning Department one copy of the approval to indicate acceptance and agreement with the conditions thereof.
 - B. Obtain a Class 2 Manufacturing License from the Cannabis Licensing Office.
 - C. Obtain a Class 2 Distribution License from the Cannabis Licensing Office.
 - D. Obtain an Authority to Construct (ATC) for all odor mitigation equipment from the Monterey Bay Air Resources District (MBARD). Any abatement device which may reduce or eliminate air contaminants is also subject to MBARD permit requirements.
 - E. Obtain a Building Permit from the Santa Cruz County Building Official.
 - 1. Any outstanding balance due to the Planning Department must be paid prior to making a Building Permit application. Applications for Building Permits will not be accepted or processed while there is an outstanding balance due.
- II. Prior to issuance of a Building Permit the applicant/owner shall:
 - A. Apply for a Cannabis Business License from the Cannabis Licensing Office.
 - B. Provide a detailed security plan to the Cannabis Licensing Office which complies with all requirements of the Sheriff's Office.
 - C. Submit final architectural plans for review and approval by the Planning Department. The final plans shall be in substantial compliance with the plans marked Exhibit "D" on file with the Planning Department. Any changes from the approved Exhibit "D" for this development permit on the plans submitted for the Building Permit must be clearly called out and labeled by standard architectural methods to indicate such changes. Any changes that are not properly called out and labeled will not be authorized by any license issued by the Cannabis Licensing Office. The final plans shall include the following additional information:

Owner: William Wheeler, JMH Properties

- 1. Details showing compliance with Accessibility requirements.
- 2. Show the location on of the bicycle parking and specifications for the bicycle racks.
- 3. A copy of the text of these conditions of approval incorporated into the full-sized sheets of the architectural plan set.
- 4. A copy of the Best Management and Operational Plan (BMOP) incorporated onto full-sized sheets of the architectural plan set.
- 5. Details showing compliance with fire department regulations.
- 6. Details showing odor mitigation controls as required by MBARD.
- D. Meet all requirements and pay Zone 5 drainage fees to the County Department of Public Works, Stormwater Management.
- E. Meet all requirements of the Santa Cruz City Water District. Proof of water service availability is required prior to application for a Building Permit.
- F. Meet all requirements of the Santa Cruz County Sanitation District. Proof of sanitary sewer service availability is required prior to application for a Building Permit.
- G. Meet all requirements and pay any applicable plan check fee of the Central Fire Protection District.
- III. All construction shall be performed according to the approved plans for the Building Permit. Prior to final building inspection, the applicant/owner must meet the following conditions:
 - A. All site improvements shown on the final approved Building Permit plans shall be installed.
 - B. All inspections required by the building permit shall be completed to the satisfaction of the County Building Official.
 - C. Pursuant to Sections 16.40.040 and 16.42.080 of the County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this development, any artifact or other evidence of an historic archaeological resource or a Native American cultural site is discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the Sheriff-Coroner if the discovery contains human remains, or the Planning Director if the discovery contains no human remains. The procedures established in Sections 16.40.040 and 16.42.080, shall be observed.

Owner: William Wheeler, JMH Properties

IV. Operational Conditions

- A. All conditions of approval required by the Cannabis Licensing Official shall remain in effect.
- B. All measures of the security plan as adopted by the Cannabis Licensing Office in compliance with the requirements of the Sheriff's Office shall remain in effect.
- C. The business is authorized to operate 24 hours per day, seven days a week.
- D. There will be no on-site retail sales of cannabis products and the premises shall not be open to the public.
- E. Employees will use existing on-site vehicle parking and bicycle parking. Employees shall not occupy more than 10 spaces at any one time.
- F. Comply with odor mitigation controls as required by MBARD Air Quality Permit.
- G. Maintain a valid California State license, posted in a conspicuous location.
- H. Maintain a valid Santa Cruz County license, posted in a conspicuous location.
- I. Prior to storing hazardous materials, submit a Hazardous Materials Management Plan. The facility shall maintain a Hazardous Materials Management Plan and comply with all hazardous materials management requirements within 30 days of storing any hazardous materials on site in excess of threshold quantities established by the California Health and Safety Code Division 20, Chapter 6.95, Article 1, Section 25507.
- J. Future development will not be permitted to encroach into the adjacent Cordelia Lane right of way in order to allow for possible future right of way improvements associated with anticipated future adoption of the Santa Cruz Sustainability Plan. Future development in the right of way may only be permitted with approval by the Planning Director and County Public Works.
- K. In the event that future County inspections of the subject property disclose noncompliance with any Conditions of this approval or any violation of the County Code, the owner shall pay to the County the full cost of such County inspections, including any follow-up inspections and/or necessary enforcement actions, up to and including permit revocation.
- V. As a condition of this development approval, the holder of this development approval ("Development Approval Holder"), is required to defend, indemnify, and hold harmless the COUNTY, its officers, employees, and agents, from and against any claim (including attorneys' fees), against the COUNTY, it officers, employees, and agents to attack, set aside, void, or annul this development approval of the COUNTY or any subsequent amendment of this development approval which is requested by the Development

Owner: William Wheeler, JMH Properties

Approval Holder.

- A. COUNTY shall promptly notify the Development Approval Holder of any claim, action, or proceeding against which the COUNTY seeks to be defended, indemnified, or held harmless. COUNTY shall cooperate fully in such defense. If COUNTY fails to notify the Development Approval Holder within sixty (60) days of any such claim, action, or proceeding, or fails to cooperate fully in the defense thereof, the Development Approval Holder shall not thereafter be responsible to defend, indemnify, or hold harmless the COUNTY if such failure to notify or cooperate was significantly prejudicial to the Development Approval Holder.
- B. Nothing contained herein shall prohibit the COUNTY from participating in the defense of any claim, action, or proceeding if both of the following occur:
 - 1. COUNTY bears its own attorney's fees and costs; and
 - 2. COUNTY defends the action in good faith.
- C. <u>Settlement</u>. The Development Approval Holder shall not be required to pay or perform any settlement unless such Development Approval Holder has approved the settlement. When representing the County, the Development Approval Holder shall not enter into any stipulation or settlement modifying or affecting the interpretation or validity of any of the terms or conditions of the development approval without the prior written consent of the County.
- D. <u>Successors Bound</u>. "Development Approval Holder" shall include the applicant and the successor'(s) in interest, transferee(s), and assign(s) of the applicant.

Minor variations to this permit which do not affect the overall concept or density may be approved by the Planning Director at the request of the applicant or staff in accordance with Chapter 18.10 of the County Code.

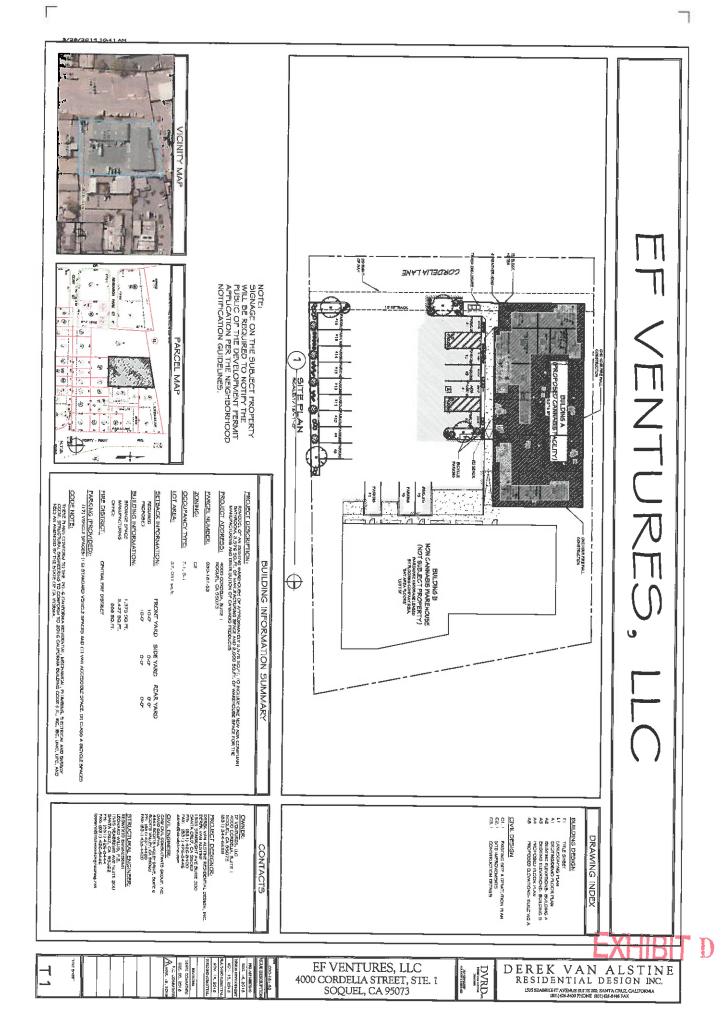
Please note: This permit expires three years from the effective date listed below unless a building permit (or permits) and cannabis license(s) are obtained for the primary structure and cannabis use described in the development permit (does not include demolition, temporary power pole or other site preparation permits, or accessory structures unless these are the primary subject of the development permit). Failure to exercise the building permit and to complete all of the construction under the building permit, resulting in the expiration of the building permit, and to obtain the cannabis license, will void the development permit, unless there are special circumstances as determined by the Planning Director and Cannabis Licensing Official.

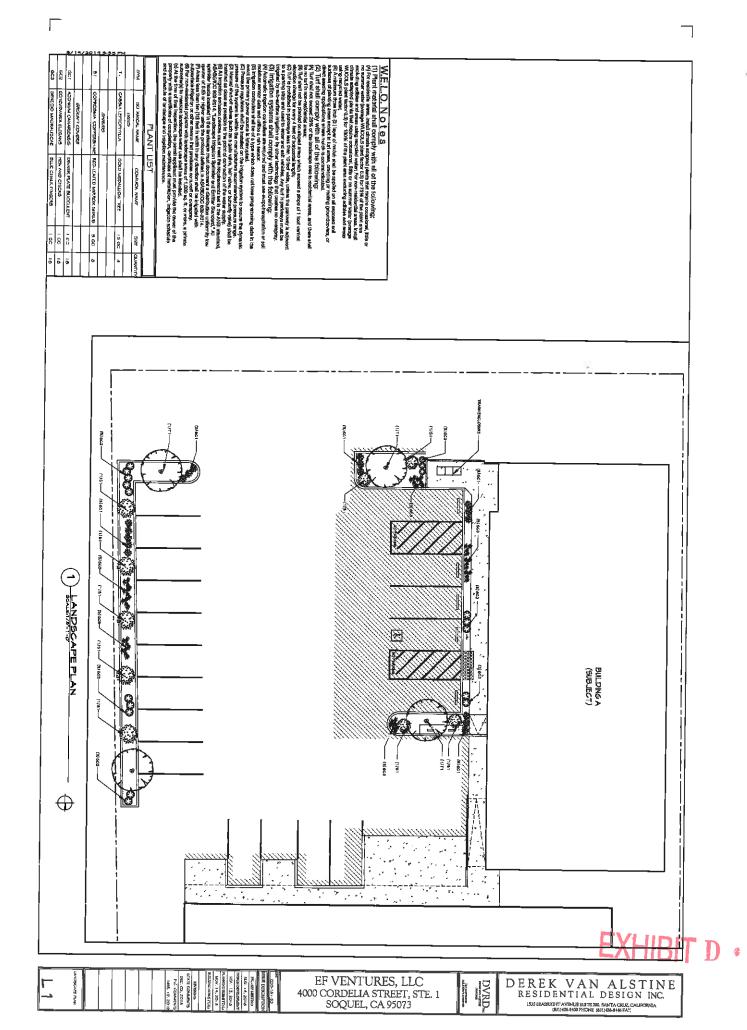
Approval Date:	 	
Effective Date:	 	
Expiration Date:	 	

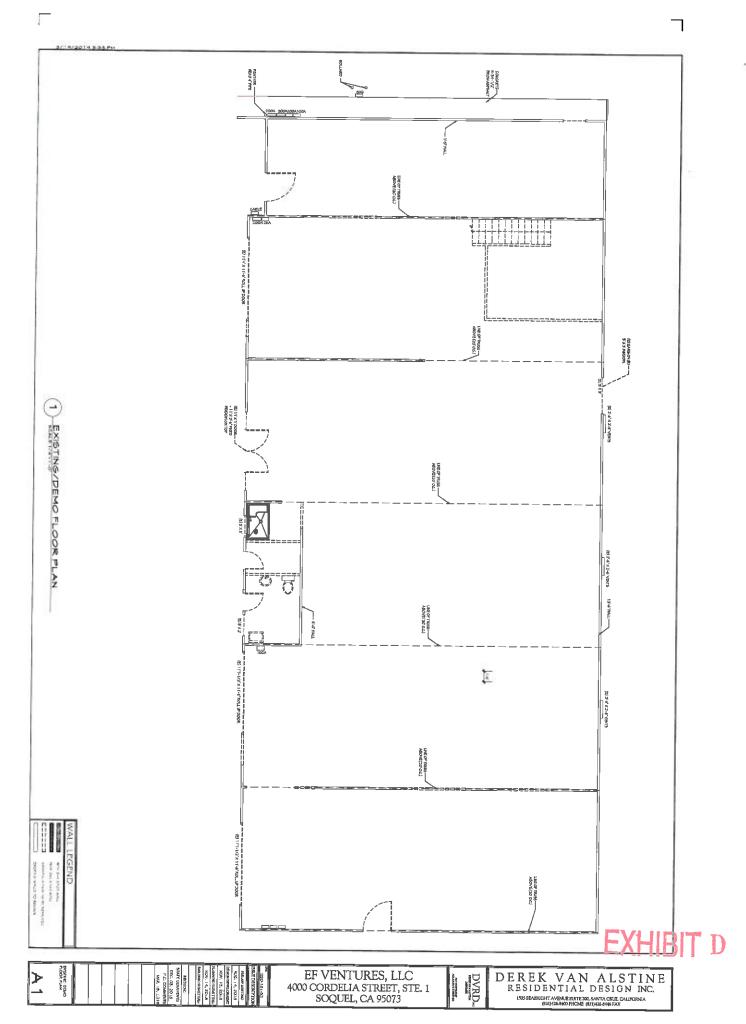
Owner: William Wheeler, JMH Properties

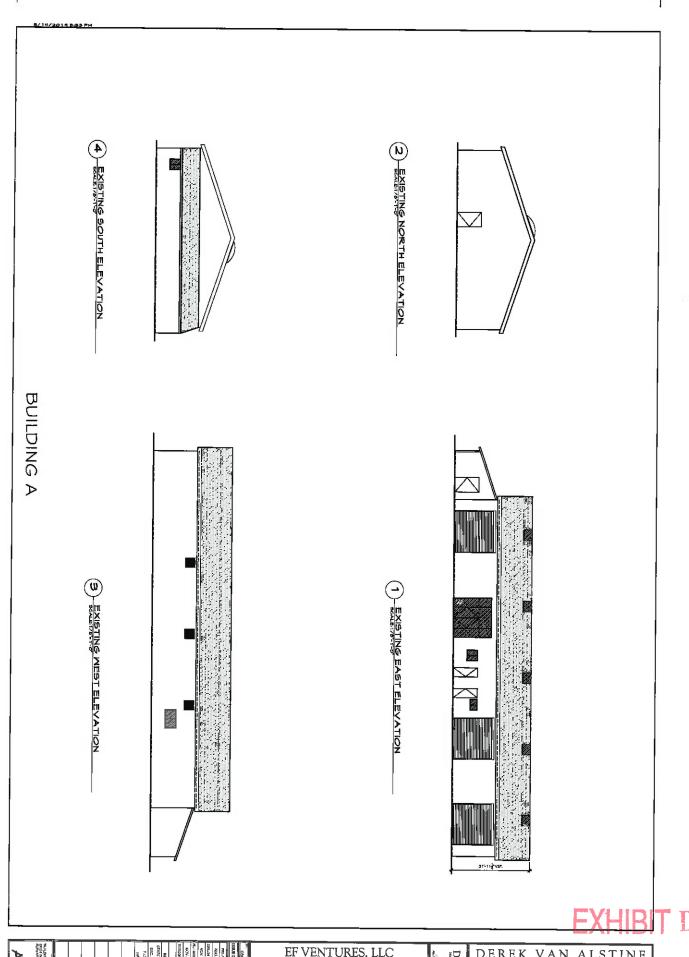
Jocelyn Drake Deputy Zoning Administrator

Appeals: Any property owner, or other person aggrieved, or any other person whose interests are adversely affected by any act or determination of the Zoning Administrator, may appeal the act or determination to the Planning Commission in accordance with chapter 18.10 of the Santa Cruz County Code.



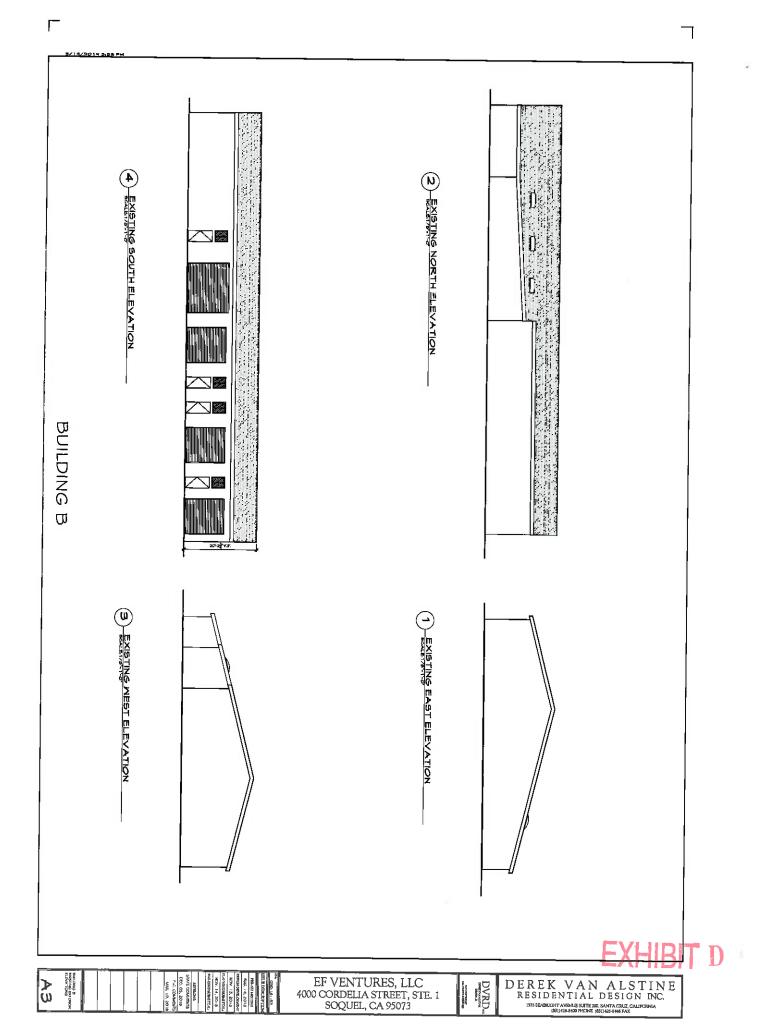


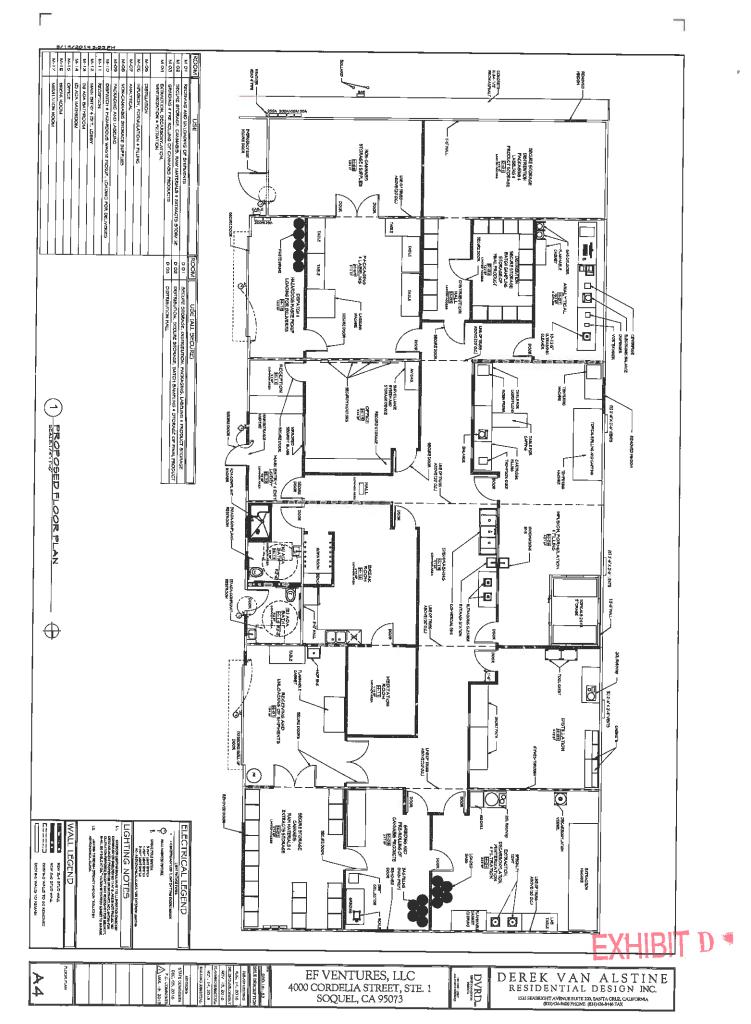


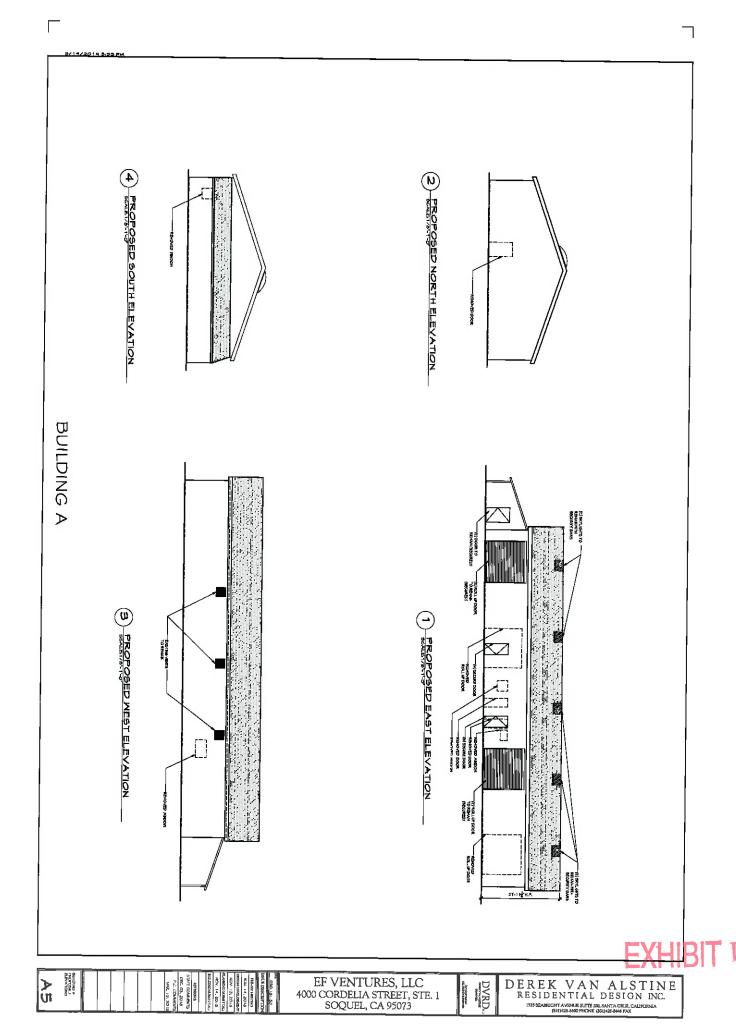


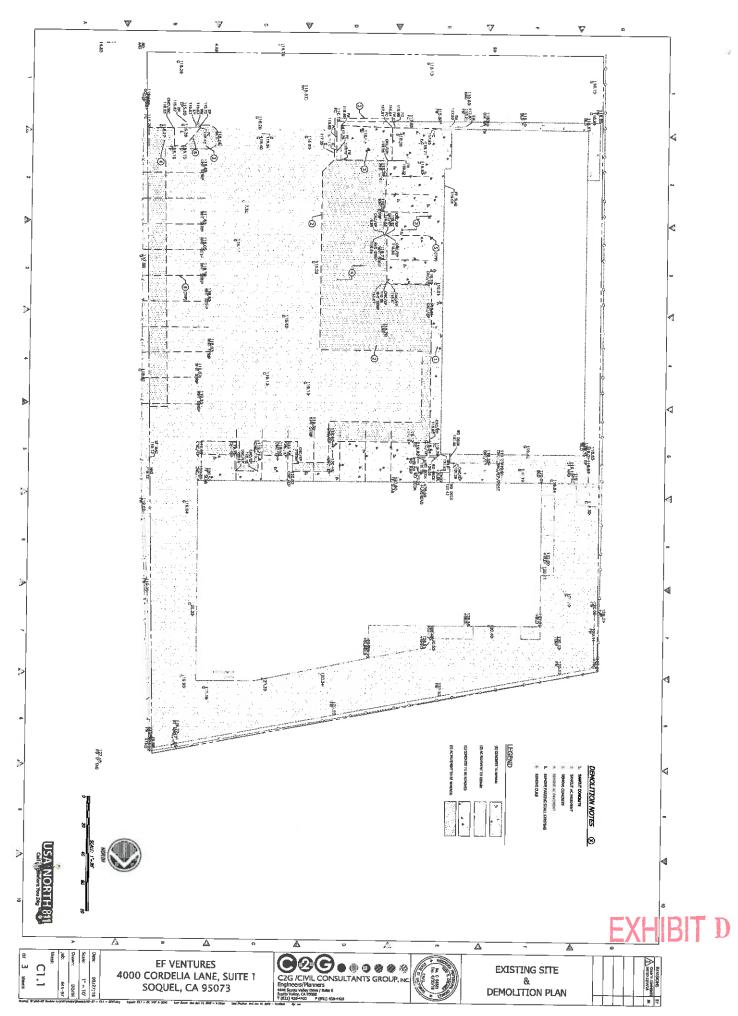
EFVENTURES, LLC

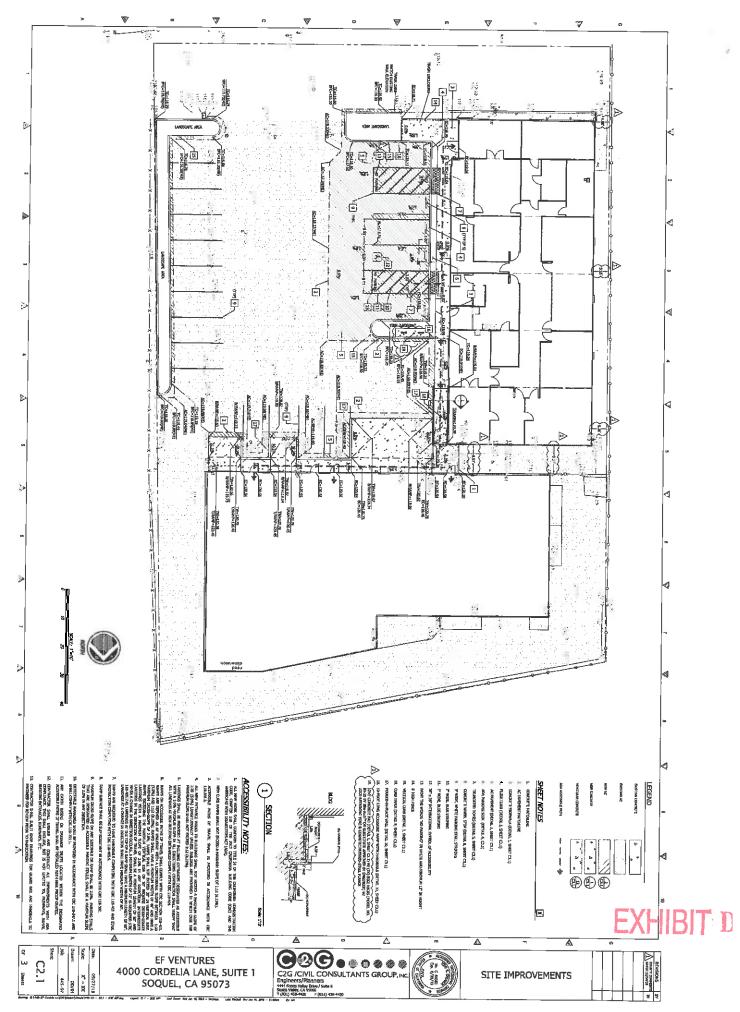
| Main | Main

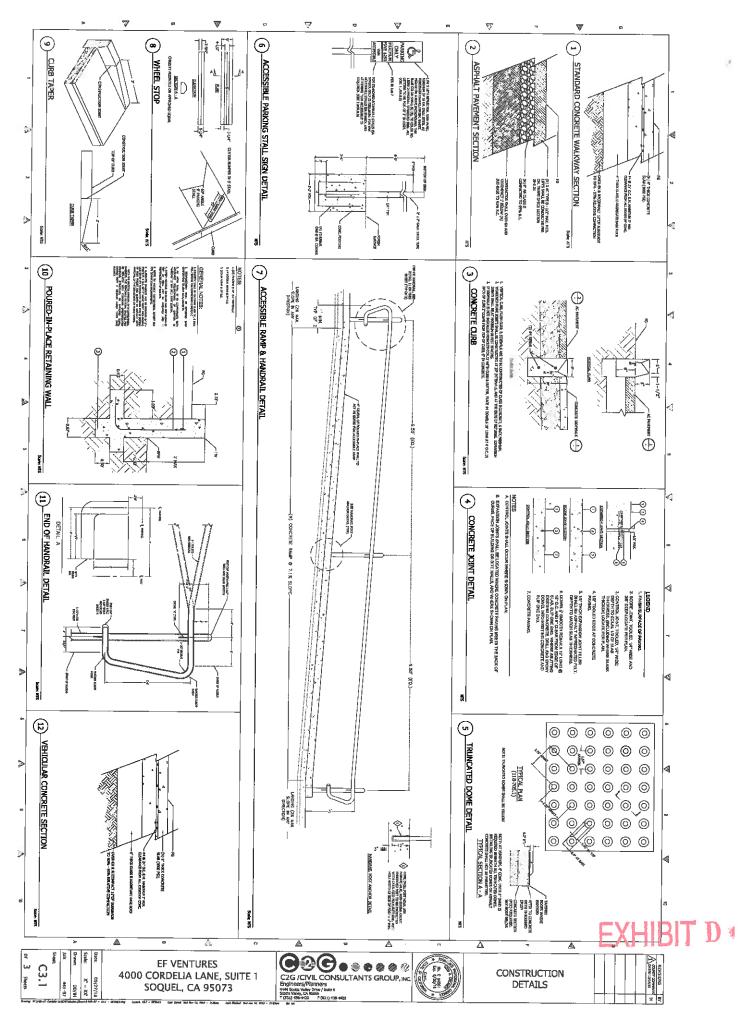


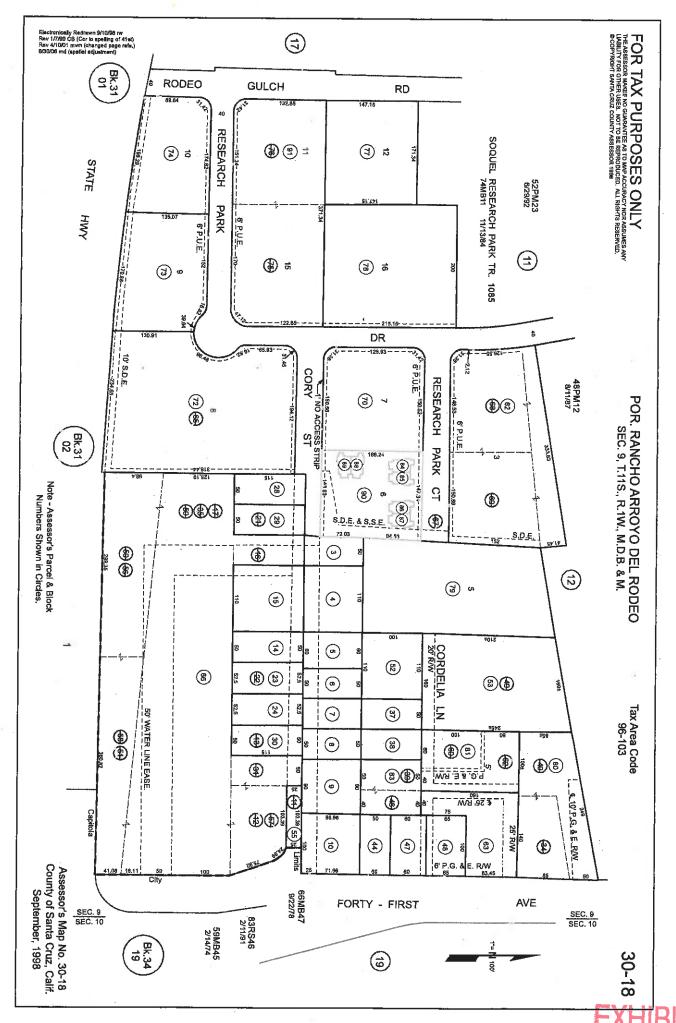










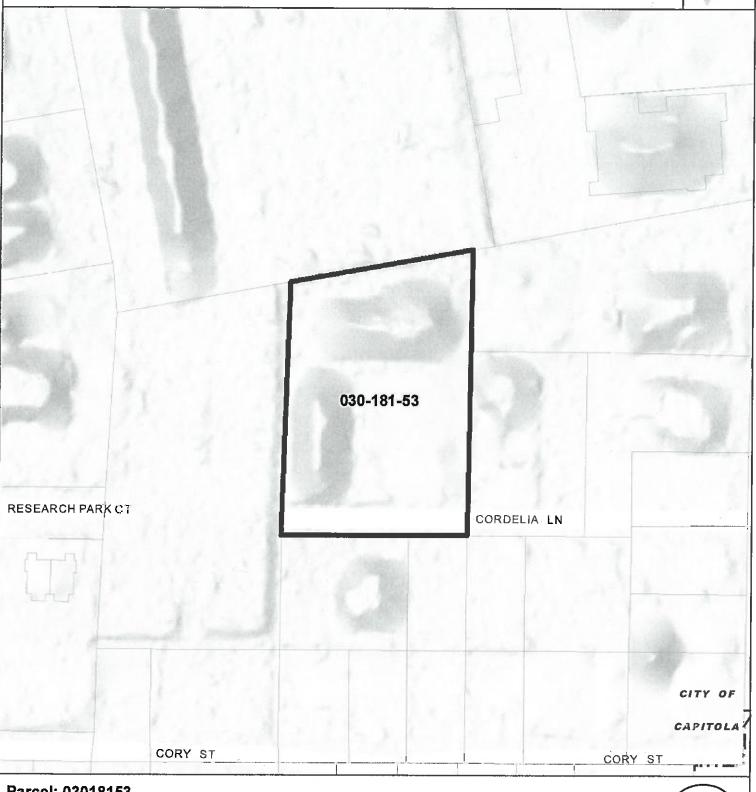




SANTA CRUZ COUNTY PLANNING DEPARTMENT







Parcel: 03018153

Study Parcel

Assessor Parcel Boundary

City Limits

Map printed: 10 Jun. 2019

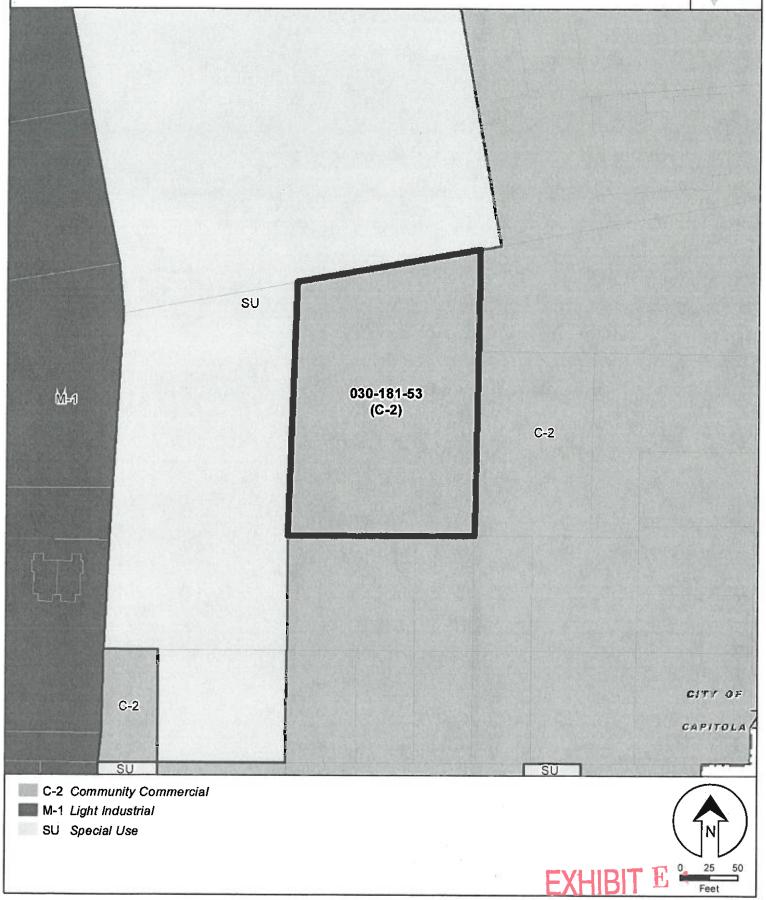




SANTA CRUZ COUNTY PLANNING DEPARTMENT

Mapped Area

Parcel Zoning Map

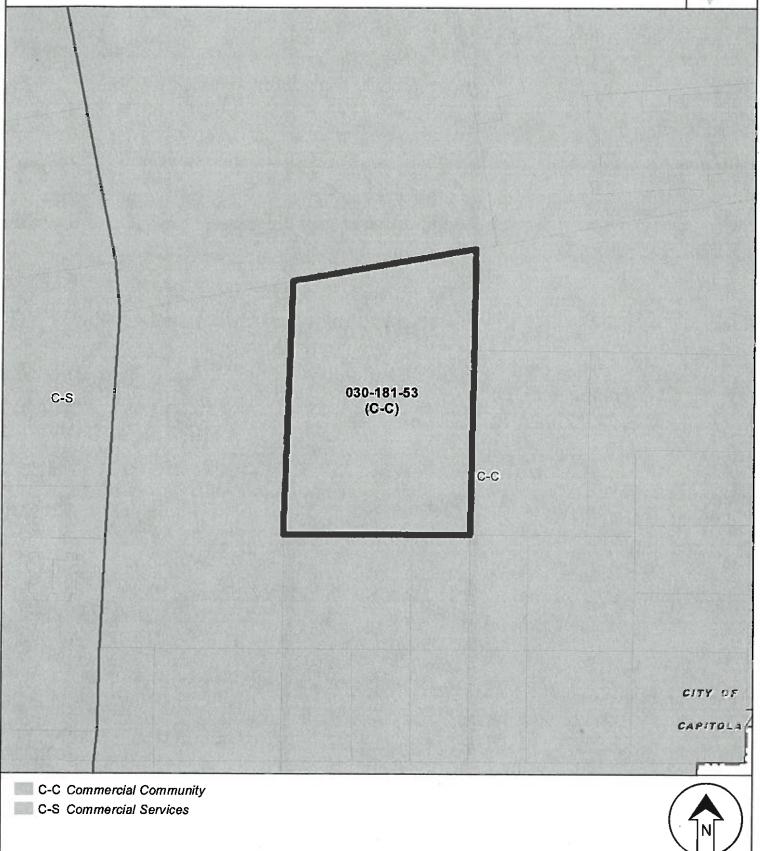




SANTA CRUZ COUNTY PLANNING DEPARTMENT

Parcel General Plan Map

Mapped Area



Owner: William Wheeler, JMH Properties

Parcel Information

Outside

Services Information

Urban/Rural Services Line: X Inside

Water Supply: Santa Cruz Water District

Sewage Disposal: Santa Cruz Sanitation District Fire District: Central Fire Department

Drainage District: Flood Control District Zone 5

Parcel Information

Parcel Size: 37,069 sq. ft. (0.85 acres)

Existing Land Use - Parcel: Warehouse Existing Land Use - Surrounding: Commercial

Project Access: Cordelia Lane
Planning Area: Soquel

Land Use Designation: C-C (Community Commercial)

Zone District: C-2 (Community Commercial)
Coastal Zone: Inside X Outside

Appealable to Calif. Coastal Yes X No

Comm.

Technical Reviews: None Required

Environmental Information

Geologic Hazards: Not mapped/no physical evidence on site

Fire Hazard: Not a mapped constraint

Slopes: 0-5%

Env. Sen, Habitat: Not mapped/no physical evidence on site

Grading: No grading proposed
Tree Removal: No trees proposed to be removed

Scenic: No trees proposed to be removed
Not a mapped resource

Archeology: Not mapped/no physical evidence on site





WATER SERVICE INFORMATION FORM

January 02, 2019

Owner:

Jmh Properties Llc

Site Address:

4000 Cordelia Ln, Live Oak

Site APN:

030-181-53

Project Description: Ti Cannabis Manufacturer

Dear Dee Murray:

Your project is located within the City of Santa Cruz Water Service area. The subject parcel is currently a developed lot, with an existing water service, and is subject to the following conditions:

- Fire service as required by the Central Fire Protection District (CFPD). Please contact 1. the Water Department (831-420-5210) to request for a bucket test to be performed on the existing water service to determine the maximum gallon per minute (GPM) flow rate. The Water Department will then email the test results to the CFPD and the bucket test applicant. Next step is to complete the top section of the attached Fire Protection Requirements form and submit to the CFPD. Once the form has been completed submit a copy to the Water Department prior to obtaining water permit. CFPD phone number: (831) 479-6843.
- 2. The commercial water service is required to have approved "no-lead" reduced pressure (RP) backflow prevention device of equivalent size as per SCWD Detail 8. Please see attached installation example and approved devices.
- 3. SCWD requests that the applicant provide a detailed fixture count list for all commercial tenant spaces on the parcel (Buildings A & B) to determine meter sizing. Currently, the commercial spaces share a 3/4" commercial water service but may need to upsize to a larger commercial water service after SCWD approves the fixture count calculation per the 2016 California Plumbing Code.

If the existing commercial water service is not sufficient, then a larger commercial water service is required to be installed as per SCWD Details. Then, the existing 3/4" commercial water service will be required to be retired (cut and capped at the main) as per SCWD standard specifications.

4. Please see the attached customer handout, SCWD standard details, and list of certified water service installation contractors. All water permit feas are due prior to the Issuance of the Water Service Installation Permit. All water service retrofit work must be completed for this project prior to signing off on the building permit final. The contractor shall confirm that the appropriate Encroachment Permit has been obtained prior to beginning work in non-City of Santa Cruz rights-of-way.

If you have any questions, please contact the Water Department Engineering Division at (831) 420-5210 Sincerely,

Yianni Charitou City of Santa Cruz | Water Dept., Engineering 212 Locust Street, Suite C Santa Cruz, CA 95060

NEW WATER SERVICE-Permit Fee Estimate

VTP 18-0208	TO BETTE					- W. S.
Mitr Config	Use Type	Typ⊕/Size	Fee Description	Num of Units	Unit Cost	Sub Total
	MASTER		BUCKET TEST	1	\$67.00	\$67.00
	WATER PERMIT					
				PERMIT	FEE TOTALS:	\$67.00

Mtr Config	Use Type	Type/Size	Fee Description	Hum of Units	Unit Cost	Sub Tota
	WBUS		C/D PLAN REVIEW NON-RESIDENTIAL - 1	1	\$134.00	\$134.0
			WATER DEV FEE - 1 (2018)	:1	\$30,331.00	\$30,331.0
			TAP INSPECTION FEE	1	\$201.00	\$201.0
			BACKFLOW DEVICE REVIEW	1	\$134.00	\$134.0
			BACKFLOW DEVICE INSPECTION	1	\$134.00	\$134.0
			GENERAL INSPECTION FEE	1	\$67.00	\$67.00
			INSTALLATION FEE - 1 IPERL METER	1	\$369.00	\$369,00
			1/2/2019: WTDEV: 5/8"	1		-\$18,199.00
				PERMIT	FEE TOTALS:	\$13,171,00

'Ermit fee estimate**	TOTAL FEE
	\$13,238.00

EXHIBIT G

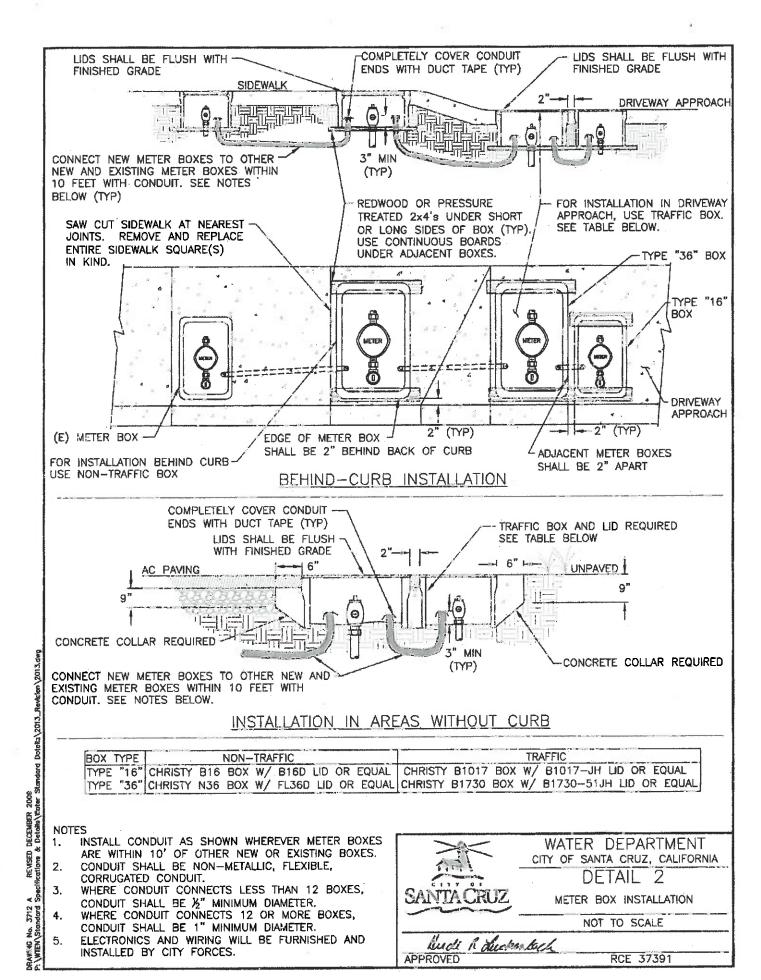
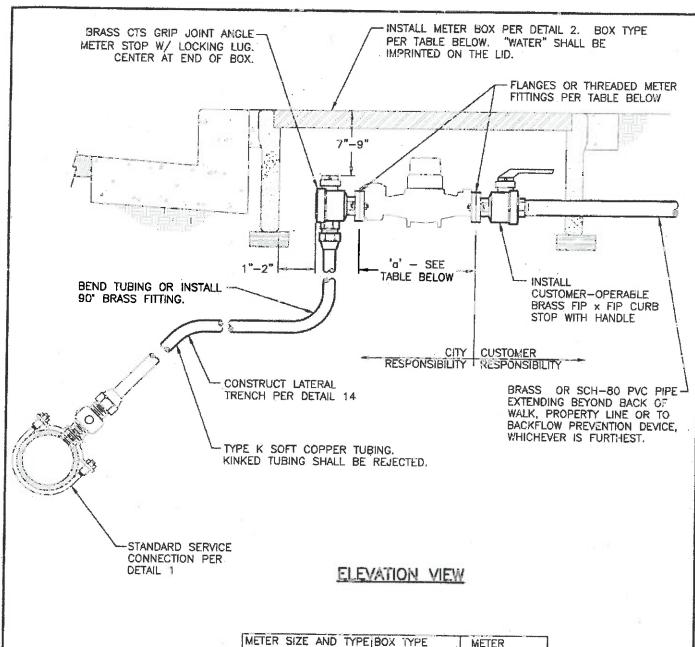


EXHIBIT G



	SIZE AND TYPE	BOX TYPE	METER
	ED BY SCWD)	(SEE DETAIL 2)	LENGTH, a
¾" T	HREADED	"16"	7¾"
	HREADED	"16"	7¾"
1½" F	HREADED	"16"	11"
	LANGED	"36"	13"
2" F	LANGED	"36"	15¼"

NOTES

- BRASS FITTINGS, VALVES AND PIPE SHALL CONSIST OF LOW-LEAD BRASS ALLOY AND SHALL HAVE A MINIMUM WORKING PRESSURE OF 150 PSI.
- METER WILL BE FURNISHED AND INSTALLED BY CITY FORCES
- A BACKFLOW PREVENTION ASSEMBLY SHALL BE INSTALLED PER DETAIL 8 IF REQUIRED BY THE ENGINEER.



WATER DEPARTMENT CITY OF SANTA CRUZ, CALIFORNIA

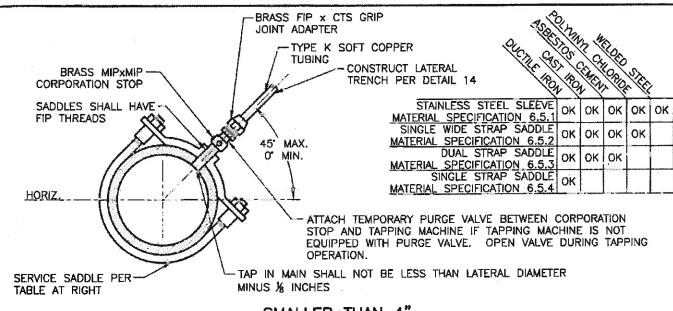
DETAIL 5

2-INCH AND SMALLER SERVICE INSTALLATION

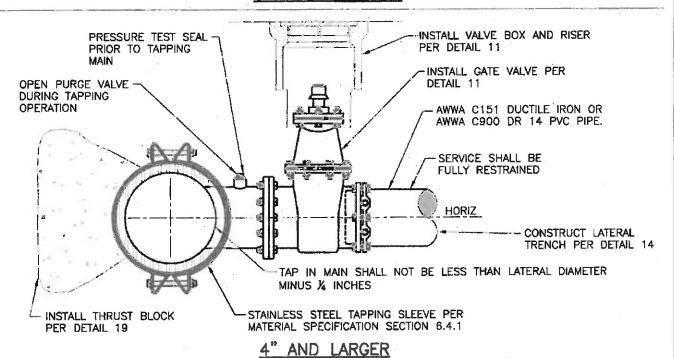
NOT TO SCALE

APPROVED Senetelly and

RCE 37391



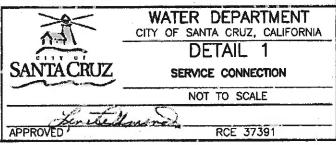
SMALLER THAN 4"

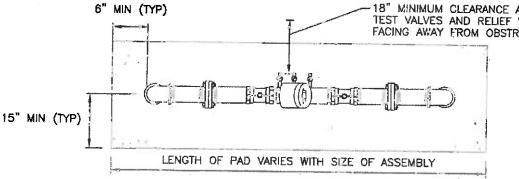


NOTES

VWING NO. 2981 A REVISED DECEMBER 2009 DOCUME~1\kdodd\LOCALS~1\Temp\AcPublish...3

- ALL HOT TAP CONNECTIONS SHALL BE MADE IN THE PRESENCE OF THE ENGINEER.
- ALL HOT TAP CONNECTIONS SHALL BE AT LEAST 24" AWAY FROM ANY JOINT OR FITTING AND 18" AWAY FROM ANY OTHER TAP.
- CONTRACTOR SHALL OPEN PURGE VALVE DURING TAPPING OPERATION.
 SERVICE PIPING AND FITTING DIAMETERS SHALL MEET OR EXCEED THE SERVICE SIZE DESIGNATED BY THE ENGINEER.
 TAPPING BIT SHALL BE OF THE HOLE—SAW OR SHELL TYPE.
- COUPON OR "COOKIE" SHALL BE SUBMITTED TO THE ENGINEER UPON REQUEST. IF COUPON IS LOST, CONTRACTOR SHALL FULLY OPEN
- SERVICE IN THE PRESENCE OF THE ENGINEER TO VERIFY FLOW.
- CONTRACTOR SHALL COAT TAPPING SADDLE, ALL FASTENERS AND SERVICE LINE WITH BITUMASTIC AND/OR ENCASE IN POLYETHYLENE IF DIRECTED BY THE ENGINEER.
- CONNECTIONS TO MAINS SMALLER THAN 4" SHALL BE SPECIFIED ON A CASE BY CASE BASIS.
- SERVICE SHALL BE DISINFECTED IF REQUIRED BY THE ENGINEER.

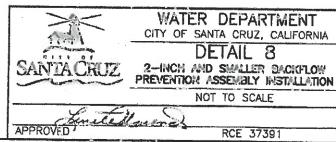




PLAN VIEW

NOTES

- APPROVED BACKFLOW ASSEMBLY SHALL BE INSTALLED SUCH THAT IT IS READILY ACCESSIBLE FOR REPAIR AND INSPECTION.
- BRASS FITTINGS, VALVES AND PIPE SHALL CONSIST OF LOW-LEAD BRASS ALLOY AND SHALL HAVE A MINIMUM WORKING PRESSURE OF 150 PSI.
- BRASS OR PLASTIC PLUGS SHALL BE INSTALLED ON ALL TEST PORTS.
- 4. ALL ABOVE GROUND PIPE, FITTINGS AND ASSEMBLY SHOULD BE PAINTED WITH TWO COATS OF ENAMEL.
- 5. AN ENCLOSURE OR CAGE MAY BE INSTALLED AT THE OPTION OF THE PROPERTY OWNER.



AWING No. 2963 A REVISED DECEMBER 2009 \DOCUME~1\kdodd\LOCALS~!\Temp\A=Publish_3460\DEC2009.dwg

CITY OF SANTA CRUZ WATER DEPARTMENT APPROVED BACKFLOW PREVENTION ASSEMBLIES FOR SERVICE ISOLATION

							E (INCH					
COMPANY	MODEL	3/4	1	1 1/4	1 1/2	2	2 1/2	3	4	6	8	10
A THE PARTY OF THE	4000B	Α	A	A	Α	Α						
	4000BM2		Α									
	4000BM3	А				······································						
	4000CIV						Α	Α	Α	Α	Α	A
	4000SS						A	Α	A ·	Α		
	4000-RP								Α	Α	Α	A
AMES	Colt 400						Α	Α	Α	Α		A
	Colt 400N		· · · · · ·				٧A	VA	νA			
	Colt 400Z						VAV	vAv	vAv			
	Maxim 400						Α	Α			Α	A
	Maxim 400N						VA	VΑ				
	Maxim 400Z					1 1350	vAv	vAv	-0.000	7.2	È.	
174	LF825Y	A	A			200					5-	
	LF825YA*	Av	Av								-	
	LF860 *	T A	A	A	A	A						
PARTIES AND									7.			
	825Y	A	A	I A	Α	A					<u> </u>	ļ
and the same of the same of	825YA	VA.	vA	- 1	vA	VΑ						
LEBAA :	825YAR	νA	VA		VA	VΑ						-
	825YD						Α	Α	Α	Α	Α	_ A
	825YR	i A	Α		A	A						-
	860	A	Α	Α	Α	<u>A</u>	Α	Α	Α	Α	A	_
	860U	Α	Α	Α	Α	Α					-	
	880						VΑ	VΑ	VA	VA	vA	VA
	880V		-		7		Az	Az	Az	Az	Az	Az
	375XL *	Α	A	A	A	Α	Α	A.	A	Α	A	A
	375AXL *	Α	Α	A	A	Α	Α	A	A	A	Α	A
	375XLMS *										A	A
	475XL *						Λ	A	A	A	vA	VΑ
	475XLMS *			V TOTAL		dental and					VA	A
	475XLV *				انسب						VA	VΑ
	475XLVMS *				والإطفا						VA	A
	975XL2 *	A	A	A	A	Α					The constant	
	375						Α	Α	Α	Α	A	A
	375A			-			Ā	A	A		A	-
	375G			-			Ā	A	A	A	A	-
	375GPI	-		-					Ä	A	A	
	375PI		-	1					. A	A	A	_
	375MS			-			A	A	A	A	A	
	475						VA	vA	VA	vA	VΑ	VΑ
	475G	-					VA	٧A	VΑ	VA	- V. V	1
WILKINS	475MS						VA	vA	vA	vA	vA	
	475V						VAV	VAV	vAv	vAv	***	VA
	475VG			 			vAv	vAv	vAv	vAv		
	475V MS			 			VAV	vAv	vAv	vAv		
	975	Α	Α	A	Α	Α	A	A	A	A	A·	A
	975A	Â	A	Â	A	A	 ^				- '	
	975BMS			1 "			Α	A	Ä	Α	Α	A
	975G			1					Ā	A		'''
Service Contract	975MS						Α	Α	Ā	Ā	А	A
	975XL	A	Α	A	Α .	Α		2.4				1
	975XLBMS	Â	Ā	A	A	Ā	,					1
	975XLD	Â		1								
ISU246	975XLMS	Â	A	Α	Α	A						
	975XLU	A	^	 - ^-	A ·	A						
		Az	Az	Az	Az	Az	-	····				
THE STREET	975XLSE 975XLSEU	AZ Az	Az	Az	Az	Az	ļ					-
												3

A signifies that these models are approved backflow prevention assemblies for horizontal installations only. Av signifies that these models are approved for both horizontal and vertical up installations.

Page 1 of 6 Revised 4/10



vAv signifies that these models are approved only for vertical up inlet/vertical up outlet configurations. vA signifies that these models are approved only for vertical up inlet/vertical down outlet configurations. Az signifies that these models are approved only for N and Z configurations.

* signifies that these models are approved CA No-Lead Rule devices.

CITY OF SANTA CRUZ WATER DEPARTMENT APPROVED BACKFLOW PREVENTION ASSEMBLIES FOR SERVICE ISOLATION

				क्रूहर्डा			E (INC		150		3 == == == == == == == == == == == =	
COMPANY	MODEL	3/4	1	1 1/4	1 1/2	2	2 1/2	3	4	6	8	1 1
	LFC09						A	A	سعاة			
	LF009M2QT*		A	A	A	Α		EE.				
	LF009M3QT	A										
	LF909 *						A	A				
	LF909QY	A	A						Ì Para	Ugue)		
	LF909M1QT			Α	A	A						
	LF919QT	VA	VA	VA	VA.	vA						
	LF919ZQ1	VAV	VAV	VAV	vAv	VAV						
	LF919AQ1	vA.	VA	٧A	vA ,	VA						
	LFU919QT *	A	Α	Α	A							
	C09						Α	A				
	009M2QT	A	A	Α	A	Α						<u> </u>
	009M2PCQT	A	Α	A	A	A						-
	009M3QT	A						-	-	i		-
	009PCQT	A						-	1			-
	009QT	A							1			
	909						Ā	Α	A	A		
	S09BB						A	A	1			
	909HWQT	Α	Α									
**	909HWM1QT			A	A	Α						
	909M1										Α	A
	909M1QT			A	A	Α						** 1
	909M1QTFDA										Α	Α
	909PCHWM1QT			A	A.	Α						
	909PCHWQT	Α	A									
	909PCM1QT			Α	Α	Α						
The second secon	909PCQT	Av	Av									
	909QT	Αv	Av									
	909QTFDA						A	Α	Α	Α		
	957						A	A	A	Α		-
	957N						VA	VA	vA			
Photo	957Z			-			vAv	VAV	VAV		2711	
Q.	967						Α	Α				
	967N						VA	VΑ				
	967Z						vAv	vAv				
The state of the s	994						Α	Α	Α	A		
	995QT		Α	A	Α							
	AE909QT	-		A	A	Α						
	AE909HWQT			Α	Α	Α						
	SS009M3QT	Α					. 1					
	SS009QT J009APCQT		A		Ī							
	JOOSAPT JOOSAPT	A										
	J009M1PCQT	A										
	JOO9M1PCQ1			A	Α	Α						
19	J009M2APCQT			Α								
	JOOSMZAQT		A		A	A						
100	009M2PCQT		A		A	Α						
T	1009M2PCQ1	_	A		A	A		<u> </u>				
	009PCQT	A	<u> </u>		Α	Α		!				
		A vAv										
12	9C9HWQT	ALJA	vAv			1		- 1		[]		

A signifies that these models are approved backflow prevention assemblies for horizontal installations only.

Page 2 of 6 Revised 4/10

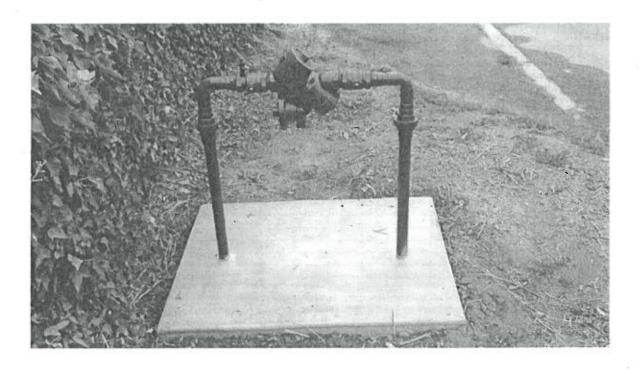


Av signifies that these models are approved for both horizontal and vertical up installations.

AV signifies that these models are approved for both nonzontal and venical up installations. vAv signifies that these models are approved only for vertical up inlet/vertical down outlet configurations. vA signifies that these models are approved only for N and Z configurations. * signifies that these models are approved CA No-Lead Rule devices.

EXAMPLE OF APPROVED 2" & SMALLER REDUCED PRESSURE BACKFLOW DEVICE INSTALLATIONS







Santa Cruz County Sanitation District

701 OCEAN STREET, SUITE 410, SANTA CRUZ, CA 95060-4073 (831) 454-2160 FAX (831) 454-2089 TDD: (831) 454-2123

MATT MACHADO, DISTRICT ENGINEER

January 11, 2019

DEE MURRAY 2272 KINSLEY STREET SANTA CRUZ, CA 95062

SUBJECT:

SEWER AVAILABILITY AND DISTRICT'S CONDITIONS OF SERVICE FOR THE FOLLOWING PROPOSED DEVELOPMENT

APN: 030-181-53

APPLICATION NO.: 181580

PARCEL ADDRESS: 4000 CORDELIA LN. #1, SOQUEL, CA 95073 PROJECT DESCRIPTION: Proposal to establish a non-retail commercial cannabis manufacturing business (single licensee) to include: Class 2 Manufacturing (non-volatile extraction, infusion) and Class 1 Distribution, within existing 5,576 square feet. The proposed cannabis manufacturing business would occupy an existing warehouse (Building A) on a C-2 zoned property. Total manufacturing square footage to equal 3,427 square feet, in addition to 1,375 square feet of storage, and 888 square feet of office space. An existing (non-cannabis) warehouse totaling 7,037 square feet (Building B) is located on the same parcel. Requires a Commercial Development Permit.

Dear Ms. Murray:

We've received your inquiry regarding sewer service availability for the subject parcel(s). Sewer service is available in Cordelia Lane for the subject development.

No downstream capacity problem or other issue is known at this time. However, downstream sewer requirements will again be studied at time of Planning Permit review, at which time the District reserves the right to add or modify downstream sewer requirements.

Plans have not been routed to the Sanitation District for review. As a condition of this letter affirming the availability of sewer service, the District will require that the Planning Department include the Sanitation District in the routing of plans for review and comment. Given that this is a relatively new type of use, the District Environmental Compliance Unit will be asked to determine whether or not a permit will be required and, if so, what documentation the applicant will be required to submit. Every effort will be made to minimize the review period.

DEE MURRAY PAGE 2

This notice is valid for one year from the date of this letter. If, after thistime frame, this project has not yet received approval from the Planning Department, then this determination of availability will be considered to have expired and will no longer be valid.

Also, for your reference, we have attached a list of common items required during the review of sanitation projects.

Thank you for your inquiry. If you have any questions, please call Robert Hambelton at (831) 454-2160.

Yours truly,

MATT MACHADO District Engineer

By:

Ashleigh Trujillo Sanitation Engineer

BH;tlp/004.doex

Common Items Required During the Review of Sanitation Projects

Note: not all these items will necessarily apply to your project.

What to show on the drawings: When you begin the design process, please show.

On the plot/site/utility plan:

1. location of any existing and/or proposed on-site sewer lateral(s), clean-out(s), and connection(s) to existing public sewer on the site (plot) plan.

Place a note, "Existing" or "(E)", on each existing item that is to be removed. Place a note, "To be removed", on each existing item that is to be removed. Place a note, "New" or "(N)", on each item that is to be new.

On a floor plan:

1: all plumbing fixtures both existing and new (label "(E)" or "(N)") on a floor plan of the entire building. Completely describe all plumbing fixtures according to table T-702.1 of the California Plumbing Code.

(Sanitation District Code sections 7.04.040 and 7.04.430)

Design and Construction Standards

The project sewer design and connection of the project to the Santa Cruz County Sanitation District system will be required to conform to the County of Santa Cruz Design Criteria (CDC) Part 4, Sanitary Sewer Design, February 2017 edition.

Reference for County Design Criteria:

http://www.dpw.co.santa-cruz.ca.us/Portals/19/pdfs/DESIGNCRITERIA.pdf

Inspection of existing lateral for new or remodel construction

This is a change of use, with associated remodel work, in a commercial building with a sewer lateral installed more than 20 years ago. The District Code requires that, if the development will involve the reuse of an existing sewer lateral for a new or remodeled structure, then, before the approval of the building permit, the applicant shall have the sanitary sewer system inspected and certified by a licensed plumber to be in good working order and free of obstructions and breaks. Please submit the following form, completed by the plumber.

http://www.dpw.co.santa-cruz.ca.us/Portals/19/SLIP_Lateral_Inspection_Form_Rev_2018-1207_fillable2_1.pdf

Repairs shall be made to any damaged or deteriorated pipe, misalignment of pipe segments, leaking pipes, root intrusion, open joints, cracks or breaks, sags, damaged or defective cleanout, inflow and infiltration of extraneous water, older pipe materials that are known to be inadequate, inadequate lift or pump stations, inadequate alarm systems for overflows, and inadequate maintenance of lift stations. You must obtain a sewer repair permit (no charge) from the District and shall have repairs inspected by the District inspector (no charge) prior to backfilling of pipe or structure. (Sanitation District Code section 7.04.375.A.3 Private Sanitary Sewer System Repair)

Increase in the number of plumbing fixtures

If the proposed plans will involve an increase in the fixture unit count for the existing sewer connection, additional fixture unit fees may be due. The exact amount will be calculated at the time a Sewer Connection Permit is issued. (Sanitation District Code section 7.04.040)

Non-residential water use

Provide to the District (attention, Robert Hambelton, Elsa Felix-Estrada, and Ashleigh Trujillo) a written estimate the amount of domestic water (average gallons per day) that will be used on this parcel after the change of use. You may need to engage an engineer or other knowledgeable person to provide an accourate estimate. This information will be used in the determination of both annual service charges and any waste pretreatment requirements. Connection permits can only be issued after these requirements are determined. (Sanitation District Code section 5.04.100)

Public sewer (existing) on the property

A public sewer main is located on the property. Any improvements in the easement will need to be removed if the District needs to replace the sewer main. No permanent improvements may be constructed within the easement boundaries. (Sanitation District Code section 7.04,430)

Backflow prevention device

A backflow preventive device may be required. While this determination is often made "in the field" at the time of installation, if you are engaging a surveyor, civil engineer, or knowledgeable contractor, there is nothing to prevent you from making that determination while in the design process. (Sanitation District Code section 7.04.100 and 7.04.375.A.4)

EF VENTURES LLC

4000 Cordelia Lane, Suites 1-4, Soquel, CA 95073

WITHIN ONE MILE OF COASTAL ZONE

The proposed project at 4000 Cordelia Lane is not located inside the Coastal zone but is located within one mile of the Coastal Zone.

Pursuant to Section SCCC 13.10.650(B)(2): Inside the Coastal Zone, and within one mile beyond the Coastal Zone, no new non-retail commercial cannabis structures may be permitted. Except for legal structures existing on the effective date of this Section 13.10.650, use of any structure for non-retail commercial cannabis use shall be considered new development.

EF Ventures will be using an existing structure and will not be building new construction. The existing legal structure (Bldg. A) that is proposed for manufacturing and distribution was built in 1961 as per building permit #10375.

Therefore, the 4000 Cordelia Lane project may be permitted because it is an existing legal structure per SCCC 13.10.650(B)(2).

Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

A. SITING CRITERIA

- 1. Avoidance of Excessive Grading: Not applicable because EF Ventures' site is an existing structure within the Urban Services Line (USL.)
- 2. Minimizing Site Disturbance and Reducing Forest Fragmentation: Not applicable because EF Ventures' site is an existing structure within the USL.
- 3. Biological Assessments: Not applicable because EF Ventures' site is an existing structure within the USL.
- **4. Archaeological and Paleontological Surveys:** Not applicable because EF Ventures' site is an existing structure within the USL.
- 5. Preliminary Historic Assessment of Structures 50 Years Old or More: Not applicable because EF Ventures' site is an existing industrial warehouse structure within the USL.

B. SITE DESIGN

- 1. Fencing and Security: EF Ventures' site will not be used for cultivation and is an existing warehouse within the USL located in a well-established industrial neighborhood. For detailed information, please see our Security Plan that will also include our Fencing Plan.
 - a. Wildlife-Friendly Fencing and Neighborhood Compatibility
 - i. EF Ventures' Fencing Plan shall depict typical fencing details, including location, fence type, and height. EF Ventures' site is not an outdoor cultivation site and our fencing and/or walls are located within the USL in an industrial neighborhood. Therefore, it is not applicable that "All fencing and/or walls shall be made out of material that blends into the surrounding terrain and shall minimize any visual impacts."
 - ii. "The Licensee shall submit fencing plans to the County CLO for review and approval to ensure all requirements above are met and to ensure appropriateness of proposed fencing (e.g., use of natural materials and compatibility of proposed fence

The information contained in this document is confidential, privileged and may not be used, published or redistributed without prior written consent of EF Ventures LLC.

EXHIBIT J

1

Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

color with surroundings and compliance with applicable fence requirements of SCCC Chapter 13.10) prior to issuance of a cultivation license." Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.

iii. EF Ventures shall demonstrate to the CLO, through a site visit or photographs, compliance with any fencing or security requirements and that all fencing is in place as required prior to commencement of cannabis business activities.

b. Lighting for Security

- i. EF Ventures' Lighting Plan shall be implemented prior to the issuance of final building inspection and/or throughout operation of the project, as applicable. The Lighting Plan shall include the following:
 - 1. Plans shall identify all lighting on the property and demonstrate that all lighting will comply with the standards set forth herein.
 - 2. Lighting necessary for security shall consist solely of motion sensor lights and avoid adverse impacts on properties surrounding the lot on which the cannabis activity is located.
 - 3. Any outdoor lighting shall be fully shielded and directed downward (SCCC 13.10.650(b)(7). All exterior light sources shall comply with the International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG).
- 2. Use of Impermeable and Permeable Surfaces: Not applicable because EF Ventures' site is not a cultivation site and is located in an existing

2



Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

structure within the USL and is not adding any impermeable footprint to the site.

- **3. Visual Screening of Cannabis Infrastructure**: Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- **4. Water Resources—Drainage:** Not applicable because EF Ventures' site is located in an existing structure within the Urban Services Line (USL) and is not adding any impermeable footprint to the site.
- 5. Water Storage: Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.

C. CONSTRUCTION REQUIREMENTS

1. Active Construction Requirements: Not applicable because EF Ventures' site is not a cultivation site, is located in an existing structure within the USL, will only be repairing existing asphalt, and all tenant improvements associated within the building will be handled per building code requirements.

D. OPERATIONAL REQUIREMENTS

1. Employees

- a. Implement TDM Measures—To reduce operation-generated NOx emissions related to offsite mobile emissions caused by implementation of the Program, EF Ventures will implement feasible TDM measures that reduce vehicle travel to and from our site:
 - i. It is not applicable for EF Ventures to provide for carpool/shuttle/mini bus service for employees, especially during harvesting periods, on cultivation sites, because EF Ventures' site is not a cultivation site nor do we have large crews arriving at one time.
 - ii. EF Ventures will provide bicycle storage/parking facilities (see site plan.)

3



Issue Date: 12/20/2018
Revision Date:

EF VENTURES LLC

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

iii. EF Ventures will provide, but not limited to, the following incentives for employees to rideshare, bike to work, or take public transportation. EF Ventures will offer Commuter Benefits that save employees money. Based on current legislation, EF Ventures can offer commuter benefits in the form of tax-free employer-paid subsidies, pre-tax employee-paid payroll deductions, or a combination of both. EF Ventures will also take part in the The Bicycle Commuter Tax Benefit, a benefit that can only be offered by employers. As of 2018, the only possible tax benefit of the Bicycle Commuter Tax Benefit is the deduction for costs associated with the benefit, which can be claimed by an employer (under Sec. 13304(c)(2) of the Tax Cuts and Jobs Act). EF Ventures may also make ridesharing a game, and offer prizes to the individuals that log the greatest number of rideshare/public transportation miles traveled.

- iv. EF Ventures will implement flexible 24 hour work schedules to stagger the employee load to off-peak traffic hours.
- b. Worker Rights and Safety– EF Ventures will comply with the following applicable requirements to ensure work health, safety and welfare:
 - i. It is not applicable for EF Ventures to comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Santa Cruz County Code (including the Building Code) because EF Ventures' site is not a cultivation site.
 - ii. EF Ventures shall comply with the following Employee Safety Practices:
 - 1. EF Ventures' operations will implement safety protocols and provide all employees with adequate safety

4



Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

training relevant to their specific job functions, which may include:

- a. Emergency response planning;
- b. Employee accident reporting and investigation policies;
- c. Fire prevention;
- d. Hazard communication policies, including maintenance of material safety data sheets (MSDS) and establish materials handling policies; and
- e. Personal protective equipment policies, including respiratory protection.
- 2. EF Ventures will visibly post and maintain an emergency contact list which includes at a minimum:
 - a. Operation manager contacts;
 - b. Emergency responder contacts; and
 - c. Poison control contacts.
- 3. At all times, employees shall have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Plumbing facilities and water source must be capable of handling increased usage without adverse consequences to neighboring properties or the environment.
- 4. No onsite camping or housing will be permitted at any time.
- 2. **Herbivory Prevention Plan** Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.

5



Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

- 3. Riparian Buffer Protection—Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- 4. **Supplemental Lighting for Cultivators** Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- 5. Pesticides, Fuel Storage, and Hazardous Materials—EF Ventures will not improperly store or use any fuels, fertilizer, pesticide, fungicide, rodenticide, or herbicide.
 - a. Pesticides- this section is not applicable since EF Ventures is not a cultivation site and will not be using any pesticides.
 - b. Storage of Fuel- this section is not applicable since EF Ventures is not a cultivation site and will not be using any pesticides.
 - c. Hazardous materials and wastes from EF Ventures are regulated by the Santa Cruz County Environmental Health Department that administers the Hazardous Materials program as one of the Certified Unified Program Agencies (CUPA). This includes the application, inspection, enforcement, and reporting under the program requirements and standards set by the California Environmental Protection Agency (CalEPA). EF Ventures shall comply with all current or future requirements of the SCC Environmental Health Department. A Hazardous Material Business Plan will be submitted through the California Environmental Reporting System (CERS) within 30 days of occupancy.
- 6. Odor Abatement Plan—Since odors will be undetectable beyond the lot lines of the parcel on which the cannabis activity will occur, a full Odor Abatement Plan is not necessary. EF Ventures provided the following items for the Cannabis Licensing Office's review and approval.
 - (1) EF Ventures has prepared and submitted an Odor Abatement Plan for the Cannabis Licensing Office review and approval.

6

Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

- (2) The Odor Abatement Plan will be permitted by the Monterey Bay Air Resources District (MBARD) as required by their regulations.
- (3) EF Ventures shall implement an Odor Abatement Plan. The Odor Abatement Plan will reduce odors that are experienced within the industrial area (not applicable to residential areas since the location is in a commercial zone), to the maximum extent feasible as determined by the Cannabis Licensing Official. The Odor Abatement Plan shall be implemented prior to the issuance of final building and/or grading inspection and/or throughout operation of the project, as applicable. The Odor Abatement Plan includes the following:
 - a. A description of the specific odor-emitting activities that will occur;
 - b. A description of all equipment and methods to be used for reducing odors. A Professional Engineer or a Certified Industrial Hygienist reviewed and certified that the equipment and methods to be used for reducing odors are consistent with accepted and available industry-specific best control technologies and methods designed to mitigate odor;
 - c. EF Ventures LLC will be using approved activated carbon filtration systems, subject to certification as required in Subsection d above.

7. Water Supply and Quality

- a. California State Water Resources Control Board Requirements— Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- b. Department of Fish & Wildlife- Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.

7



Issue Date: 12/20/2018 Revision Date:

EF VENTURES LLC

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

- c. Water Tank Supply Management- Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- d. Irrigation—Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- 8. Waste—EF Ventures has developed and will obtain approval for and execute a waste management plan that details all waste handling and storage procedures to be used for the cannabis business pursuant to the requirements of the California Department of Food and Agriculture, California Department of Public Health, Bureau of Cannabis Control, and the Santa Cruz County Department of Public Works.

EF Ventures has prepared and submitted a Solid Waste Management Plan for the cannabis site (Cannabis Soil and Plant Material Plans are not applicable because EF Ventures' site is not a cultivation site,) which describes the type and amount of solid waste that would be generated by the manufacturing and distribution operation (see the EF Ventures Waste Management Plans for Hazardous and Non-Hazardous Materials.)

- a. EF Ventures' Waste Management Plan provides detail on how waste (green waste, solid waste, hazardous waste, as applicable) will be properly stored and secured for disposal onsite, and provides detail on where and how cannabis plant material will be disposed of onsite or offsite. All measures that are used will be maintained through the life of the project.
 - i. Green Waste Management— not applicable because cannabis plant material and other organic materials will not be composted and/or mulched on this site.
 - ii. Litter Control—A litter control program will be instituted at EF Ventures' site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed trash containers. The trash containers shall be removed from the site at a frequency sufficient to prevent overflow of trash.

8



Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

iii. General requirements for other business waste—All waste shall be securely contained and covered in an area designated for waste and recycling. All EF Ventures' operations shall contain trash/waste in a manner that maintains neighborhood compatibility including eliminating potential odors and visual impacts. Transfer of cannabis waste material from the site shall only occur as allowed by state and local regulations, either through pre-treatment onsite to render the waste acceptable to licensed landfill or composting facilities, or using a commercial hauler that meets state and local regulations for the treatment and disposal of cannabis waste.

- 9. Alternative Energy Sources—Electrical power for indoor cultivation operations including but not limited to illumination, heating, cooling, and ventilation shall be provided by alternative energy sources according to the following priority: This section is not applicable since EF Ventures is not a cultivation site.
- 10. **Energy Conservation** EF Ventures will maximize energy efficiency of cannabis activities, including, but not limited to:
 - a. Conduct an annual energy audit;
 - b. Measure and record net energy usage;
 - c. Maintain efficient heating/cooling/dehumidification systems;
 - d. Implement energy efficient lighting, specifically LEDs over HID or HPS lighting where feasible;
 - e. Implement automated lighting systems;
 - f. Utilize natural light when possible;
 - g. Utilize an efficient circulation system;
 - h. Ensure that energy use is above or in-line with industry benchmarks;

9



Issue Date: 12/20/2018

EF VENTURES LLC

Revision Date:

4000 Cordelia Lane Suites 1-4, Soquel, CA 95073

i. Implement phase-out plans for the replacement of inefficient equipment.

- 11. Access Roads—This section is not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.
- 12. Site Closure or Cleanup and Restoration Plan for Relocated Cultivation Sites— Not applicable because EF Ventures' site is not a cultivation site and is located in an existing structure within the USL.

10



County of Santa Cruz Cannabis Licensing Office 701 Ocean Street, Room 520 Santa Cruz, CA 95060 831-454-3833

Cannabisinfo@santacruzcounty.us



January 15, 2019 Re: Application 181580 APN: 030-181-53

Situs: 4000 Cordelia Lane #1, Soquel

Zoning Finding

Based on the findings and conditions, stated below, the Cannabis Licensing Official recommends APPROVAL for application 181580.

The applicant requires a finding by the Licensing Official that the proposed stand-alone manufacturing facility within the C-2 zone is consistent with the General Plan and compatible with and will not adversely affect surrounding area, as detailed in SCCC 13.650(D)(2)(g). The details of the findings include:

- Consistent with the General Plan Designation: The site has a General Plan designation of Community Commercial (C-C) and has a zone district of Community Commercial C-2. SCCC section 13.10.170 (D) establishes the C-2 zone district as an implementing zone for the C-C General Plan Designation. Per SCCC 13.10.650(D)(1), Class 1 and 2 cannabis manufacturing uses are permitted in the C-2 zone.
- Will not adversely affect surrounding areas: The site is located in a commercial area with all adjacent parcels having a General Plan Designation of C-C. The site is fully developed with minimal pervious areas. The applicant has developed a Security Plan consistent with the requirements established by the Cannabis Licensing Office. All operations will be indoors and the access to the site will be restricted to employees and approved vendors/suppliers.

Finally, it is important to note that, in addition to maintaining compliance with all conditions of an approved Use Permit, every cannabis business is required to obtain a license from the Santa Cruz County Cannabis Licensing Office. Cannabis licenses are subject to annual renewal and any violation of state or local laws may result in revocation or denial of license renewal.

For this facility, the license would be conditioned to state that the facility is subject to possible license revocation if three or more valid complaints are received by the County regarding odor, security, on other operational conditions.

Based on these findings and conditions, the Cannabis Licensing Official recommends APPROVAL for Application 181580.

Samuel LoForti

Cannabis Licensing Manager



EF VENTURES LLC

4000 Cordelia Lane, Suites 1-4, Soquel, CA 95073

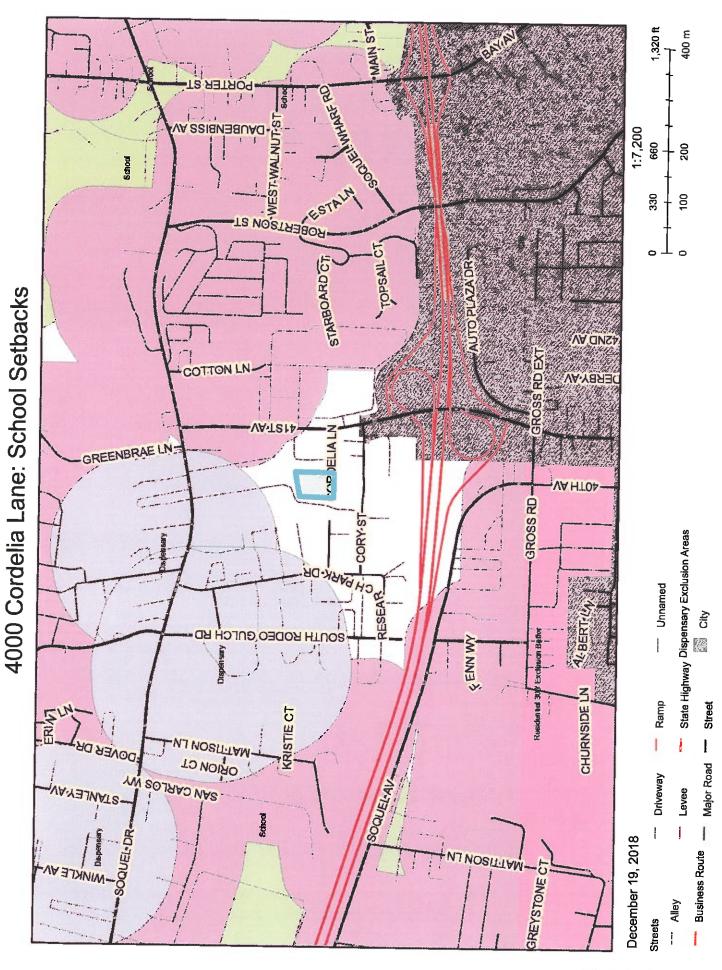
SETBACK FROM SCHOOLS

The proposed manufacturing and distribution facility located at 4000 Cordelia Lane meets the setback requirements per SCCC 13.10.650(D)(3) Setbacks. No cannabis manufacturing facility may be located within 600 feet from (i) a school, (ii) a day care center, or (iii) a youth center (see attached GIS map.)

The surrounding 600 foot radius around 4000 Cordelia Lane is predominately commercial. The approximate distance from any school is between 2000-3000 feet and there are no daycares or youth centers within the 600-foot radius.

Therefore, the proposed Cordelia project is compliant with SCCC 13.10.650(D)(3).







March 27, 2019

EF Ventures c/o Derek Van Alstine 1535 Seabright Avenue, Suite 200 Santa Cruz, CA 95062

Re: 4000 Cordelia Lane, Santa Cruz County, CA

Dear Derek,

Per your request, this letter provides professional transportation planning services for a proposed cannabis warehouse and manufacturing facility at 4000 Cordelia Lane, located northwest of the State Route 1 / 41st Avenue interchange, in unincorporated Santa Cruz County, California. The proposed project would occupy an existing 5,690 square foot building.

Santa Cruz County requires a formal traffic impact analysis if the project would generate 20 or more AM or PM peak hour vehicle trips. However, this project would generate fewer trips; hence, a formal traffic impact analysis is not required for this project. This letter instead focuses on the estimation of the project's vehicle trips and the potential for the project to generate traffic impacts.

Exhibit 1 depicts the location of the study project.

A. Project Trip Generation

The project is a proposed cannabis warehouse and manufacturing facility. The project would be located in an existing 5,690 square foot building and would operate 7 days per week.

The project would initially employ 12 people, split evenly over morning and swing shifts (i.e., between 9:00 AM and 12:00 AM). Future expansion to 18 employees could occur with the addition of a graveyard shift. With the additional of the additional employee shift, the operating hours of the project would expand to 24 hours per day.

Deliveries to and from the site would occur a total of three times per week during operating hours only. Deliveries would not occur between 8:00 AM - 9:00 AM (i.e., the AM peak hour) on weekdays to allow others continued access to an unrelated building adjacent to the project building.



EF Ventures c/o Derek Van Alstine March 27, 2019

Exhibit 2 summarizes the project trip generation, which was quantified using trip rates in *Trip Generation Manual*, 10th Edition, published by the Institute of Transportation Engineers (ITE) in 2017. This publication does not include trip rates for cannabis processing, packaging or storage. Hence, a review of the industrial trip rates – the uses most akin to the proposed project – was performed to identify the most appropriate rates to estimate the project traffic. As shown on **Exhibit 2**, Manufacturing was selected, primarily due to its similarity to the proposed project uses.

To be conservative, the ultimate employee count of 18 employees was used to quantify the project trip generation.

The project would generate an estimated 44 daily trips, with 7 trips (5 in, 2 out) during the AM peak hour and 6 trips (2 in, 4 out) during the PM peak hour.

B. Other Non-Project Site Uses

As mentioned previously, there is an additional, non-project related building adjacent to the project building that shares the same access from Cordelia Lane as the project. This building is a storage building/warehouse for a commercial building material sales company, with between 1-3 deliveries per day. These deliveries include both removing materials for daily customer deliveries in the field and delivery of materials from the manufacturer to the non-project related building. As many as five employees are involved with the delivery process during each delivery.

As also shown on **Exhibit 2**, the non-project related building generates an estimated 12 daily trips, with 2 trips (1 in, 1 out) during the AM peak hour and 2 trips (1 in, 1 out) during the PM peak hour. When the non-project and project building trip generations are added together, they would generate a total of 56 daily trips, with 9 trips (6 in, 3 out) during the AM peak hour and 8 trips (3 in, 5 out) during the PM peak hour.

C. Assessment of Project Impacts

The small amount of traffic generated by the project would distribute across the surrounding street network near the project site, including 41st Avenue, Soquel Drive, and State Route 1. This would effectively minimize the effect of these trips on any one of these roadways. This conclusion would also hold when also considering the trip activity from the existing non-project related building. The project would therefore not significantly impact the operations of the surrounding street network.

The project would be subject to Santa Cruz County's Soquel Transportation Improvement Area (TIA) fee, the payment of which would address potential cumulative (or long-term) impacts to roadways and intersections in the county.





Page 2 JWC-044 4000 Cordelia Letter5

D. Conclusion

In summary, the project would generate an estimated 44 daily trips, with 7 trips during the AM peak hour and 6 trips during the PM peak hour. The project would not significantly impact the operations of the surrounding street network, even when including traffic from the adjacent non-project related building sharing the same access from Cordelia Lane. The project would be subject to Santa Cruz County's Soquel Transportation Improvement Area (TIA) fee.

If you have any questions regarding the contents of this letter or need additional information, please contact me at your convenience. Thank you for the opportunity to assist you with this project.

Respectfully submitted,

Jeff Waller, TE

Owner / Senior Analyst

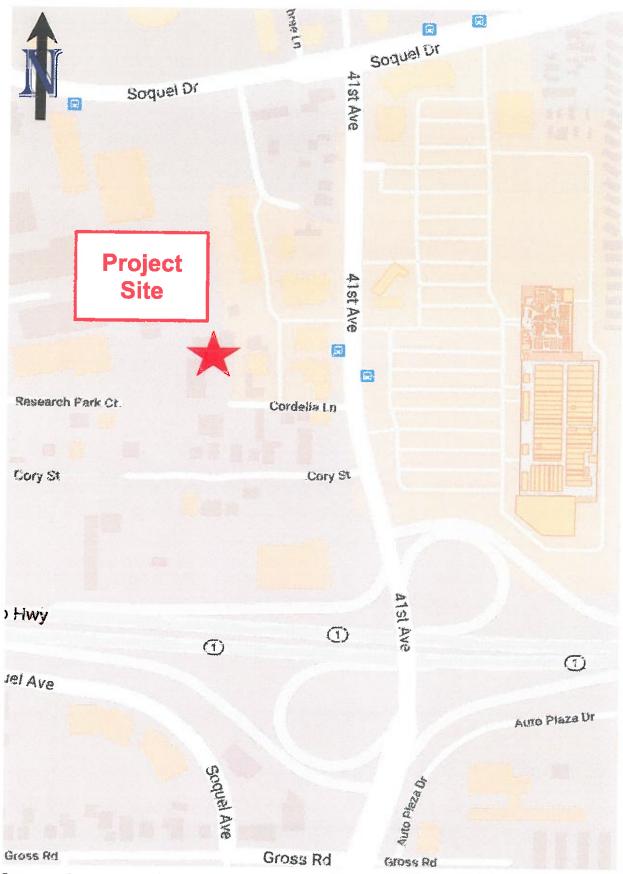
T: (408) 607-1454

E: jeffwallerconsulting@gmail.com

Cc: Jozee Roberto, EF Ventures







Basemap Source: Google, 2018.

Jeff Waller Consulting

Exhibit 1
Project Location
Map



TRIPS

TRIPS

Z

ADT

TRIPS

700

ADT

TRIPS

TRIPS

TRIPS Z

HOUR TRIPS

DAILY

PROJECT

SIZE

PROPOSED USE

Project Total:

2

9

2

S

44

			$ ^{<}$	AM PEAK HOUR	HOUR			PM PEA	M PEAK HOLID	
			l				•			
EXISTING NON-PROJECT USE	PROJECT		PEAK HOUR	%OF	TRIPS	TRIPS	PEAK HOUR	% _P O	TRIDA	TOIGE
(BUILDING B)	SIZE	TRIPS TI	TRIPS	ADT	Z	OUT	TRIPS	ADT) <u>Z</u>	TUO
		24								
Non-Project Total:		12	2		1	1	2		1	-

Grand Total (Project plus Non-Project Uses):

1. Trip generation rates published by Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 10th Edition, 2017, unless otherwised noted.

O

26

- 2. sq. ft. = square feet 3. AM peak hour trip generation reduced by 50% as project will not be open during much of the AM peak hour.





303 Potrero St., Suite 47-202 Santa Cruz, CA 95060 Phone: 805-570-9791 scottshelton@seedscca.com www.seedscca.com

Regarding: Odor Mitigation Review Letter	Date: 11.9.18

To Whom it May Concern,

I, Scott Shelton, a Licensed Mechanical Engineer in the State of California have reviewed the "EF-Odor Control Plan" dated 11.8.18. I agree with the plan and believe that the methods being used will help mitigate odors and are consistent with accepted and available industry-specific best control technologies and methods.

In summary it states that all exhaust air from the building will be filtered (odor mitigated) by the use of activated carbon (gas-phase) filters before exiting the building. In addition, the exhaust air flow rate, cubic feet per minute (CFM) value, will exceed the ventilation air flow rate and therefore keep the building at negative pressure. This will make it so little to no air leaves the building without being odor mitigated first.

When and if this odor mitigation system is designed correctly there should be little to no smells extending beyond the building envelope or the property line. It should be understood that any plant where smelly products are processed, whether it be cannabis, ethanol, onions, turmeric, etc., can never be 100% effective. There will be times when an unaccounted for wind, open door, or less effective filter creates a situation where smells extend beyond the building envelope.

Thank you.

Scott Shelton P.E.
CEM | LEED AP BD+C

President | Mechanical Engineer

SEED Santa Cruz Inc. 303 Potrero St., Suite 47-202 Santa Cruz, CA 95060 Phone: 805-570-9791

website: www.seedscca.com email: scottshelton@seedscca.com

Review Letter

Page | of |

SEED Santa Cruz Inc.



EF Ventures LLC 4000 Cordelia Lane Suite 1 Soquel, CA 95073

The manufacturing process and delivery procedures EF Ventures will be engaging in at 4000 Cordelia Lane will not produce odors that leave the facility's property line. This will be achieved by installing a negative air pressure ventilation system that routes all exhaust air leaving from the facility's manufacturing areas through charcoal activated filters sized properly for cubic feet per minute (CFM) of air being exhausted. Whereas it is extremely difficult to limit 100% of the odors from leaving the building those odors leaving the building will be of a minimum amount and dispersed in such a way no odors will be detectable beyond the property line. The final design of the ventilation system will be completed by a mechanical system design professional experienced in controlling exhaust odors. The system design will be reviewed and approved by a licensed Mechanical Engineer prior to submission to Building Permit plan check process. In addition to the ventilation system design, all door and window openings will be provided with gasketing/ sealed to minimize to air leakage from interior as much as possible. The ventilation system negative pressure design component will prevent air from leaking to the exterior through any minor gaps in the gasketing.

The following is a list of activities that will occur at the subject property, which activities will produce an odor, and how the odor-emitting activities will be mitigated:

1. Delivery of cannabis:

All cannabis will be delivered in odor proof sealed bags and/or containers, and dropped at the receiving dock (Room M-01). The ventilation system negative air pressure design component will minimize if not eliminate air from leaving the receiving dock area through the open roll up door during this process. The sealed bags will then be immediately placed into an air-controlled secure storage room (Room M-02). No odor will be detected at this time.

2. Grinding:

The sealed cannabis will be removed from the secure storage room and taken into the sealed air-controlled grinding room (Room M-03) where the bags will be opened and the cannabis will be placed into the shredding machine. Once the grinding is completed, the cannabis material will be resealed back into odor proof bags and/or containers. We will also be grinding other certified organic herbs for some of our formulas and they may emit a mild odor, they will also be stored in odor proof bags and/or containers. Pre-rolls may also be made inside this room. As an additional safeguard, the grinding room will have an installed charcoal granulated air filter. Odor will be detected in the grinding room during this process but only minimum amounts will be released outside the building and those amounts will undetectable at the property line.

EF Ventures LLC 4000 Cordelia Lane Suite 1 Soquel, CA 95073

3. Extraction:

The sealed cannabis will be taken into the closed extraction room (Room M-04) where it will be opened and placed into a centrifuge and mixed with ethanol. There will be a brief odor until the cannabis is mixed with ethanol, where it will be sealed inside the closed loop machine. Once extracted, the cannabis oil will either be placed into airtight sealed jars or will go into a RotoVap machine directly connected to the centrifuge. Mild odor will be detected in the room when first opening the cannabis. For the extraction process, a mild odor may be detected but will be controlled and filtered through the ventilation system.

4. Winterization:

Some of our products may go through a winterization process that will either occur inside of our extraction machine during the extraction process, or will happen when we place the cannabis oil into the freezer (Room M-04.) The winterization process will not emit any odor whether it happens inside the closed loop machine or while inside the freezer.

5. Filtration:

The cannabis oil will be taken to the filtration station (Room M-04), filtered, and then immediately placed back into the sealed jars. The extracted cannabis oil will be in airtight sealed jars and the oil, once opened, has a mild cannabis odor, much like opening a jar of peanut butter. A mild odor may be detected but will be controlled and filtered through the ventilation system.

6. Decarboxylation:

Some of our products will go through a decarboxylation process that will occur inside of room M-04. During the decarboxylation process, the cannabis oil will be placed inside an industrial decarb oven. For the decarboxylation process, a mild odor may be detected but will be controlled and filtered through the ventilation system.

7. RotoVap:

For some of our products, the sealed jars of cannabis oil or herbal material will be placed into a closed loop RotoVap machine (Room M-04). While the machine is running, no cannabis or herbal odor will be detected. When that process is complete, the cannabis or herbal oil will be returned to airtight sealed jars. A mild odor may be briefly detected when opening the jars and emptying the RotoVap but will be controlled and filtered through the ventilation system.

8. Short Path Distillation:

The extracted cannabis oil has a very mild cannabis odor and the distillation process does not emit any cannabis odor. The sealed cannabis oil will be placed into the short path distillation closed loop machine and distilled (Room M-05). Once

EF Ventures LLC 4000 Cordelia Lane Suite 1 Soquel, CA 95073

completed, the oil will immediately be placed back into airtight sealed jars. A mild odor may be briefly detected when opening the jars. These minor odors will be controlled and filtered through the ventilation system.

9. Infusion:

Some of our products, like the topicals, will require infusion into oil or butters. This infusion process does emit some cannabis/herbal odor similar to a simmering soup. The infusion will occur in the infusion/formulation room (Room M-06) and will be sealed during this process. As an additional safeguard, the infusion room will have an installed charcoal granulated air filter. Odor will be detected but will be controlled and filtered through the ventilation system.

10. Formulation/Filling:

The formulation and filling room (Room M-06) is where all of our ingredients and cannabis oil will be formulated and filled into their containers for retail outlets. There will be little to no cannabis odor emitting during this process and once the product is sealed in it's final container, no odor will emit from the sealed containers. Mild odor may be detected but will be controlled and filtered through the ventilation system

11. Packaging/Labeling:

Once the products are in their final sealed containers, they will be brought to the packaging and labeling station (Room M-09) where they will be labeled and placed in boxes/final packaging and moved to the final product storage room. No odor will be detected in the packaging/labeling station.

12. Distribution Storage

Once the final products are completed in the manufacturing area they will be transferred over to the separated distribution area (per state requirements) and will be placed into the Distribution Storage room (D-01) where they will be stored until the batches are tested and moved into the Final Product Storage Room. No odor will be detected in the Distribution Storage & Packaging room.

13. Final Product Storage:

All products/boxes in the final product storage room (Room D-02) will not emit any cannabis odors. No odor will be detected in the final product storage room.

14. Dispatch:

All products/boxes in the dispatch room (Room D-03) will not emit any cannabis odors. No odor will be detected in the dispatch room. The ventilation system negative air pressure design component will minimize if not eliminate air from leaving the Dispatch dock area through the open roll up door during this process.

EF Ventures LLC 4000 Cordella Lane Suite 1 Soquel, CA 95073

15. Analytical:

The analytical room (Room M-07) is where cannabis flowers, cannabis oil, and final products will be tested in-house to ensure quality and accuracy for all formulations. Very small amounts of cannabis or final product are tested at one time and will only emit a mild odor when opened until it is placed in the testing machine or in a petri dish. This room must be kept immaculate and free of contaminants. Some mild odor will be detected during initial testing phase but will be controlled and filtered through the ventilation system.

EF VENTURES LLC 4000 Cordelia Lane, Suites 1-4, Soquel, CA 95073

NOISE LEVELS

Revision Date: 03/27/19

Noise from the proposed project at 4000 Cordelia Lane will be compliant and consistent with the Santa Cruz County General Plan Noise Element including Sections 6.9.1 thru 6.9.4 and Santa Cruz County Code (Noise) Chapter 8.30.

All equipment used during the manufacturing and packaging processes will be located at the building interior and operate at a very low decibel level. Little to no discernible interior operations noise will be audible outside the facility's exterior walls.

The odor control system will have all fans located in the interior of the building with the exhausted air being discharged in an upward direction via duct work through the roof. Our design-build mechanical contractor Airtec Services has completed a preliminary review and suggests the project will require two exhaust fans. Airtec has selected a fan that is appropriate for the general exhaust through carbon filters and sized the wheel on the large side to reduce the rpm required at design which nets a pretty low sound band, especially when these will be installed indoors. We have attached a cut sheet on this equipment for your review. You will see on the cut sheet the equipment will have a decibel level at 5 feet from the equipment between 68 to 71 dBA. Therefore, the decibel level at the property lines will be far below the County's allowable maximums.

The project will not install or use a generator, trash compactor, air compressors, refrigeration compressors or any other noise generating machinery on the exterior of the building. The only equipment that might be located on the exterior would be associated with an air conditioning (AC) system. If an AC system is to be installed the design and equipment will comply with all current Building Codes, Mechanical Codes and allowable noise levels for the project's Land Use Category as per Santa Cruz County Codes & General Plan Noise Element.

Therefore, 4000 Cordelia will be compliant with the requirements of Santa Cruz County Code 13.10.650(B) (17).



Mark: Mark 1

Model: USF-415-BI

Performar	nce
Quantity	1
Volume (CFM)	2,000
Total External SP (in. wg)	1.5
Operating Power (hp)	0.87
Required Power (hp)	0.87
Fan RPM	1576
Max Fan RPM	2,674
Oper. Frequency (Hz)	60
Elevation (ft)	49
Start-up Temp.(F)	70
Operating Temp.(F)	70

Fan Configur	ation
Construction Type	PermaLock
Size	15
Arrangement	10
Rotation	CW
Discharge Position	UB
Spark Resistance	None
Scroll Material	Steel
Wheel Material	Steel
Inlet Cone Material	Steel
Pedestal Material	Steel

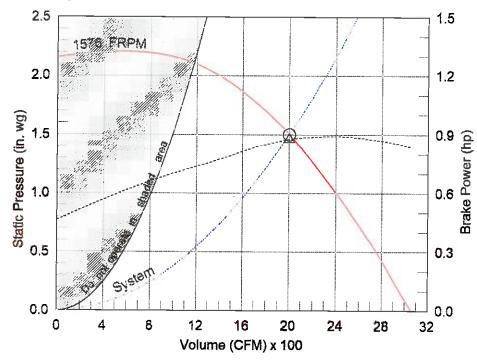
Equipment We	eights
Fan (LMD)(lb)	190
Motor/Drive (lb)	28
Accessories (lb)	35

<u> </u>	
Misc Fan D	ata
FEG	71
Outlet Velocity (ft/min)	1,550
Static Efficiency (%)	58
Tip Speed (ft/min)	6,188

Motor and D	rives
Motor	Included
Size (hp)	1
RPM	1725
Enclosure	ODP
V/C/P	208/60/3
Frame Size	56
Max Frame Size	215
Location	Centered
Pulley Type	Constant
Drive Loss (%)	6.5
Drives	Single
Drive Service Factor	1.5
NEC FLA* (Amps)	4.6

Model: USF-415-BI Centrifugal Utility Fan - Backward Inclined Wheel

Operating Performance



Operating Bhp point Operating point at Total External SP Fan curve System curve

----- Brake horsepower curve

These numbers are decibels levels at 5 feet from the fan. Considering the fans will be located within the building walls and roof it is safe to say the sound level at the property lines will be well below the County's maximum allowable levels.



Carred Data	00.5	405	050		1000					-	-	-	
Sound Data	62.5	125	250	500	1000	2000	4000	8000	LwA(dBA	Г	§ones
Inlet	82	81	77	76	75	70	66	61	79	۳	68	K	15.9
Outlet	92	88	86	80	75	72	67	61	83	7	71	17	21

factory.

LwA - A weighted sound power level, based on ANSI S1.4

dBA - A weighted sound pressure level, based on 11.5 dB attenuation per octave band at 5 ft- dBA levels are not licensed by AMCA International Sones - calculated using AMCA 301 at 5 ft

P:\Caps\Jobs\CL\DAVE OLSON SOUND DATA.gfcj







Mark: Mark 1

Model: USF-415-BI

Model: USF-415-BI

Centrifugal Utility Fan - Backward Inclined Wheel

Standard Construction Features:

HOUSING: Unit support angles with pre-punched mounting holes - Adjustable motor plate - Corrosion resistant fasteners - Steel components are phosphatized and coated. BEARINGS, SHAFT, AND WHEEL: Heavy duty, self-aligning ball or roller pillow block bearings - Polished, solid steel shafts - Welded centrifugal wheel

Selected Options & Accessories:

Motor VFD Rated without Shaft Grounding Protection
Motor sized for fan rpm operation with VFD, not power line Hz
Motor with Class B or Greater Insulation
Discharge Position - UB
Bearings - L(10) Life of 80k Hours
UL/cUL-705 - Power Ventilators
Polished Steel Shaft
Inlet Connection - Slip Fit
Outlet Connection - Slip Fit
Weatherhood - Steel
Coating - Permatector, Concrete Gray-RAL 7023, Fan and Attached Accessories
Unit Warranty: 1 Yr (Standard)

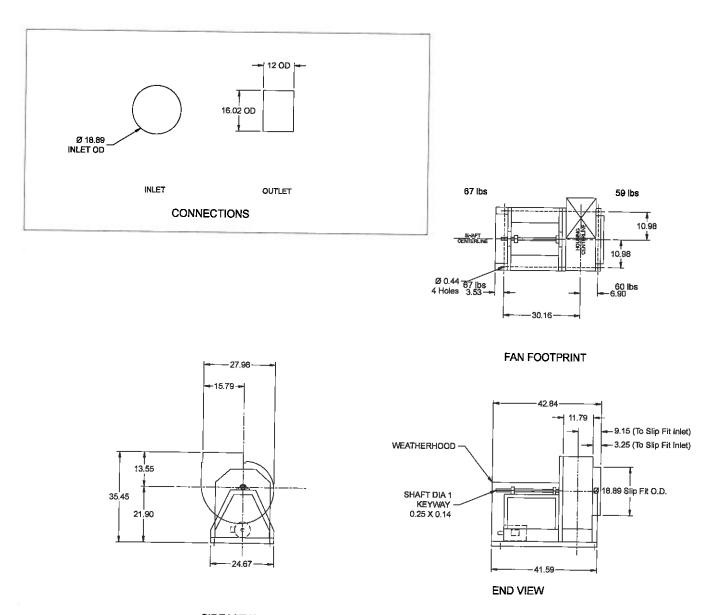


Mark: Mark 1

Model: USF-415-BI

Model: USF-415-BI

Centrifugal Utility Fan - Backward Inclined Wheel



SIDE VIEW

*SIDE VIEW IS VIEWED FROM DRIVE SIDE

*FANS ARE SUBJECT TO ±.125 INCH TOLERANCE *DUE TO CONTINUAL IMPROVEMENTS DIMENSIONS MAY CHANGE

Notes: All dimensions shown are in units of in.

Page 3 of 4



Mark: Mark 1 Model: USF-415-Bl

Warranty - 1 Yr (Standard)

WARRANTY AND LIABILITY: SELLER warrants to Buyer that products manufactured are free from defects in material and workmanship for a period of 1 Yr (Standard) from the date of shipment. SELLER's obligations and liabilities under this warranty are limited to furnishing FOB factory or warehouse at SELLER's designated shipping point, freight allowed to Buyer's city, (or point of export for shipments outside the conterminous United States) replacement equipment (or at the option of SELLER parts therefore) for all Seller's products not conforming to this warranty and which have been returned to the manufacturer. No liability whatever shall attach to SELLER until said products have been paid for and such liability shall be strictly limited to the purchase price of the equipment shown to be defective. SELLER may make further warranty protection available on an optional extra-cost basis and which must be authorized and in writing.

Motors are warranted by the motor manufacturer for a period of one year. Should motors furnished by SELLER prove defective during this period, they should be returned to the nearest authorized motor service station. SELLER will not be responsible for any removal or installation costs.

Electrical components, excluding motors, are warranted only to the extent warranted by the original manufacturer. To the extent that SELLER is entitled to pass through a warranty of the original equipment manufacturer of the electrical goods sold, SELLER will pass through such warranties to Buyer.

ANY MISUSE, NEGLECT, FAILURE TO FOLLOW INSTRUCTIONS OR MANUALS OF INSTALLATION OF MAINTENANCE REPAIR, SERVICE, RELOCATION OR ALTERATION TO OR OF, OR OTHER TAMPERING WITH, THE PRODUCTS PERFORMED BY ANY PERSON OR ENTITY OTHER THAN SELLER WITHOUT SELLER'S PRIOR WRITTEN APPROVAL OR ANY USE OF REPLACEMENT PARTS NOT SUPPLIED BY SELLER, SHALL IMMEDIATELY VOID AND CANCEL ALL WARRANTIES WITH RESPECT TO THE AFFECTED PRODUCTS.

THE WARRANTY AND LIABILITY SET FORTH HEREIN ARE IN LIEU OF ALL OTHER WARRANTIES AND LIABILITIES WHETHER IN CONTRACT OR IN NEGLIGENCE, EXPRESSED OR IMPLIED, IN LAW OR IN FACT, INCLUDING IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR USE. SELLER PROVIDES NO INDEPENDENT WARRANTY FOR THIRD PARTY PRODUCTS OR COMPONENTS SOLD TOGETHER OR INCORPORATED WITH SELLER'S PRODUCT(S).

EXHIBIT

EF VENTURES LLC 4000 Cordelia Lane, Suites 1-4, Soquel, CA 95073

CLARIFICATION FOR ONSITE PARKING

Updated: May 20, 2019

EF Ventures LLC will limit onsite vehicle traffic to a maximum of 10 vehicles at any one time for 4000 Cordelia Lane, Building A.

EF Ventures plan to begin our operations with 6 employees per shift, starting with two shifts (day and swing) and adding a third graveyard shift, if necessary. EF Ventures may add more employees in the future to allow for growth and prosperity.

Some EF Ventures' employees may not have a car, and some employees may use alternative transportation (i.e. biking or riding a bus, please see our BMOPs for employee rideshare incentives.)

If there is any overflow beyond the 10 parking spaces, EF Ventures will provide transportation by offering rides to and from work and/or bus passes to EF Ventures employees.