



**TRINITY COUNTY**  
**COMMUNITY DEVELOPMENT SERVICES**  
BUILDING - ENVIRONMENTAL HEALTH - PLANNING  
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**Kim Hunter, Director**

**MEMORANDUM 2**

DATE: March 11, 2021  
TO: Planning Commissioners and members of the public  
FROM: Kim Hunter, Director of Planning *KH*  
SUBJECT: Agenda Item 5 – Appeal of Director’s Decision CCL 453 (P-20-31)

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The attached comments have been received regarding this appeal.

***Sent by Electronic Mail***

March 10, 2021

Dear Madame Chair Stewart and Commissioners  
P.O. Box 2819  
Weaverville, CA 96093  
Info.Planning@trinitycounty.org

RE: Rebuttal to Attorney Kindermann's Letters Dated January 20 and March 5, 2021  
Appeal for CCL 2020-453 (Dos Santos)  
Hearing Date and Time: March 11, 2021 at 5:30 p.m.

The Friends of the Lewiston Grass Valley Creek (“Appellants”) is an organized group of concerned property owners and tenants living in or near the Ohio Hill subdivision (“Subdivision”) where Mr. Dos Santos (“Dos Santos”) is the applicant for a Small Outdoor Cannabis Cultivation License Renewal (“Project”) located in a residential community at 4790/4798 Lewiston Road.

Applicants hereby submit a rebuttal of Attorney Kindermann's letters dated January 20 and March 5, 2021, provide additional factual arguments in favor of said Appeal to the Trinity County Planning Commission (“Commission”) for consideration and therefore seek the following:

- 1) Uphold the appeal and reverse the Planning Director's decision to approve the Renewal of License CCL 2020-453 and deny/revoke the license.

For the reasons explained below, Appellants respectfully request the Commission uphold the appeal to reverse the Planning Director's approval of the CCL-453 License Renewal. Specifically, the following will demonstrate that: (1) the county erred when it determined a categorical exemption at the time the license was issued in 2018, renewed in 2019, and proposed to be renewed in 2020 as such actions were legally inappropriate pursuant to the California Environmental Quality Act (“CEQA”); (2) the Project site has been altered without final approval of the application by the County of Trinity; (3) the Project has deficiencies complying with Ordinance No. 315-843 (as well as recently adopted Ordinance No. 315-849); and (4) the Commission can confidently uphold the appeal.

**I. The County Erred When It Determined A Categorical Exemption At The Time the License Was Issued In 2018, Renewed In 2019, And Proposed To Be Renewed In 2020. Such Actions Were Legally Inappropriate Pursuant To The California Environmental Quality Act (“CEQA”).**

- A. Dos Santos acquired the existing Project erroneously determined by the former Planning Director to be Categorically Exempt (Class 1 Section 15301 – Existing Facilities) pursuant to the California Environmental Quality Act (“CEQA”). According to the County’s CEQA Attorney Derrick Cole, only 281-282 licenses previously approved under the California Water Board received the categorical exemption (Source: Planning Commission Meeting on October 8, 2020, Item 2 - Appeal of Planning Director’s Decision (E. Bell and K. Bell / M. Konior, P-20-28)). Please refer to Mr. Cole's segment of the recorded meeting explaining the differences between the first 281-282 licenses issued with categorical exemptions and new applications at [1:28:00 to 1:44:37] ([Trinity County Planning Commission 10-8-2020 Meeting](#)).

Furthermore, according to the Planning Director's email dated January 21, 2021 (Exhibit A), the cannabis license [CCL-453] was issued in May 2018 under Cultivation Ordinance 315-830 (adopted in March 2018). It was not one of the first initial licenses issued in the first two years (2016 and 2017) of the program.

**B.** Attorney Kindermann argues in her letter dated March 5, 2021, that the CCL-453 [Dos Santos] project does indeed qualify for a Categorical Exemption under CEQA for the following reasons:

1) *“Use Of A Categorical Exemption Under CEQA Does Not Mean A Project Has Not Complied With CEQA.”*

The discussion cites:

- a) a statutory exemption (CEQA Guidelines §15260, et seq);
- b) a categorical exemption (CEQA Guidelines §15300, et seq.); or
- c) the “common sense” exemption (CEQA Guidelines §15061(b)(3).

All three exemption types of the CEQA Guidelines note the Authority Cited as Section 21083 of the Public Resources Code. However, Business and Professions Code Division 10 Cannabis, Chapter 5 Licensing, Section 26055 paragraph h (BPC 20655(h)) specifically states Division 13 (commencing with Section 21000) of the Public Resources Code does not apply to commercial cannabis.

2) *“The “Existing Conditions” CEQA Exemption Is Appropriate For The Project Because The Conditions That Existed At The Time The Application Was Filed And Deemed Complete Is The Appropriate “Project Baseline” For CEQA Review.”*

Once again, all sections cited in the discussion (CEQA Guidelines §15125(a)(1), §15378(a), §15382, §15041(a)) note the Authority Cited as Section 21083 of the Public Resources Code which does not pertain to commercial cannabis per BPC 20655(h).

3) *“Even If The County Did Not Fully Comply With CEQA When It Originally Approved The Project, The Applicant Is Entitled To A Legal Presumption That The County Fully Complied With CEQA And Established A New Baseline for Future Discretionary Decisions.”*

Attorney Kindermann claims the CCL is now legally presumed to be adequate under CEQA by citing *CREED-021 v. City of San Diego* (2015) 234 Cal.App.4th 488 as a similar principle. This case, however, pertains to a revegetation project near a storm drain which has no relation to the exemption of a Commercial Cannabis license. Again, case records cite Public Resources Code sections that do not pertain to commercial cannabis per BPC 20655(h).

**C.** Appellants assert baseline changes have indeed been made to the Project. Supporting documentation include site maps depicting southwest expansion of the approved cannabis canopy between 2019 and 2020, as well as the new 11,000+ square foot graded flat (Exhibits B-1, B-2, B-3, specifically the areas circled in red). Per the County’s FAQ for Existing Trinity County Commercial Cannabis Licensee/Applicants 2020, this Project clearly does not qualify for the Class 1 Categorical Exemption, thus an Initial Study proving CEQA compliance is required. The document states in part:

***If you had a Class 1 Categorical Exemption on your site last year for Existing Facilities and have not changed any of the site conditions and operations from last year, you may receive another Class 1 CE, although you must submit a completed check list for a Class 1 Categorical Exemption' and provide the information to the County. If your site triggers any of the exemptions identified in the CEQA guidelines (related to location, cumulative impacts, significant effects, scenic highways, hazardous waste sites or historical resources), the County will not issue a Categorical Exemption and you must prepare an Initial Study.***

## **II. Project Site Has Been Altered Without Final Approval of the Application By the County of Trinity;**

- A. Appellants filed a timely appeal on August 6, 2020, which put a “Stay” on the renewal of the license. This means the license has not technically been issued and operations must cease until the appeal is heard. Technically, Dos Santos only has an “application to transfer the license” for CCL-453. Despite the Stay on the license, Dos Santos had a bulldozer grading at the Project for several days after the appeal was filed. Written comments submitted by a number of neighbors in the nearby vicinity attest to this work.

The attached email from the Planning Director (Exhibit C) dated August 10, 2020 is evidence of this work being reported. August 11, 2020 a photo was taken of the bulldozer being removed from the Project (Exhibit D). When questioned about these series of events in a telephone conversation in January 2021, the Planning Director stated, “He [Dos Santos] didn't know and he removed the bulldozer the next day. People make mistakes.”

Appellants assert Dos Santos did in fact ***know*** and made a ***choice***, not a mistake [emphasis added]. The Dos Santos' signed ***Acknowledgment of Maintaining Existing Site Conditions*** dated May 15, 2020, is evidence of Dos Santos' knowledge that no such work is allowed. Dos Santos also owns 40 acres in Douglas City (CCL-269) that has been in operation since 2018. His signed ***Acknowledgment of Maintaining Existing Facilities*** exists for that project as well. These signed Acknowledgements located in the Planning Department cannabis files CCL-453 and CCL-269 respectively state in part:

***As the Property Owner, I hereby acknowledge that until final approval of the above application by the County of Trinity, no work such as grading, site development, infrastructure placement, tree removal, construction, trenching, operations or activities required in this application will be allowed.***

***I understand that if the project site is altered prior to project approval, the review of the project by the County will be more difficult and potentially expensive and that additional mitigation measures and/or conditions of approval may be imposed. Further, unauthorized work may cause enforcement by other agencies and/or denial of the application.***

Dos Santos is indeed an experienced cultivator expanding his operations in Trinity County by purchasing multiple commercial cannabis licenses. He did not make a mistake, he chose to continue operations even though a Stay was in effect.

### III. The Project Has Deficiencies with Trinity County Ordinances and Memorandums Nos. 315-843 and 315-849.

- **Ordinance No. 315-843 (3)(e) Application Requirements. Ownership of a License May Only Be Transferred Under The Following Conditions: paragraph (i)** Licensee may transfer their license as part of the sale of the property for which the license has been issued. The new owner shall reapply, pay applicable fees, and meet all requirements for the property to transfer. All exceptions that apply to the original license shall transfer with the license ...
- **Ordinance No. 315-843 (9)(a) Fees.** The County shall collect from the applicant a regulatory Cannabis Cultivation Program Fee ... when the applicant applies for a registration of Cannabis cultivation site with the Planning Department pursuant to the Ordinance.

According to file records, the license expired on May 27, 2020 (under Michael Syvertson's ownership). There is no evidence the County mailed the required Notice of Applications for Commercial Cannabis Cultivation License to property owners within 300 feet of subject property before or within 30 days after the expiration of the existing license. A Notice dated July 13, 2020 was subsequently mailed – 32 working days after the license expired. A timely appeal was filed.

Dos Santos paid this fee on September 11, 2020 as recorded on the Cannabis Worksheet (Exhibit E) – 75 working days after the license expired. Requests for documents, submissions of documents and site inspections subsequently occurred between September 14, 2020 and September 24, 2020 as recorded on both the Cannabis Worksheet (Exhibit E) and the Administrative Deficiencies worksheet (Exhibit F). Per Ordinance No. 315-843, September 11, 2020 is therefore the application date. Hence the application should not be deemed a transfer nor renewal; the application is a NEW application and should be treated as such without CEQA exemption.

Appellants contend the license never renewed nor has it been issued. The license has been set aside for the Stay and is therefore not considered an active file. This is further supported by the fact the Notice of Exemption from CEQA was not posted in the Office of the Trinity County Clerk for the 2020 renewal.

For these reasons, Appellants contend the Planning Director's **December 8, 2020 Policy Memo on Inactive Commercial Cannabis Cultivation Licenses and Transfers** ([posted on the Planning Department Commercial Cannabis Division website](#)) applies to this license. The license is technically inactive as one that was previously issued but has expired (paragraph 1) and is thus inactive as it pertains to a transfer (paragraph 2). It states only active commercial Cannabis cultivation licenses that have been issued may be transferred. Applications for commercial Cannabis licenses are not eligible to be transferred.

- **Ordinance No. 315-849 Section 17.43.060 – Performance Standards for commercial Cultivation of Cannabis (B.)** The cultivation of cannabis shall not exceed the noise level

*standards as set forth in the County General Plan: 55 A-weighted decibels (dBA) from 7 am to 7 pm and 50 dBA from 7 pm to 7 am measured at the property line ...*

Dos Santos had a bulldozer grading at the Project all day (for several days) after the appeal was filed and on August 10, 2020, the bulldozer worked until 7:30 pm. As explained in II.A. above, Appellants and the Planning Director had an email exchange about this work. According to the OSHA's website, construction noise level from a bulldozer is 93-96 dBA. More importantly, authorization of this work conflicts with Dos Santos' signed Acknowledgment Of Maintaining Existing Site Conditions dated May 15, 2020.

- ***Ordinance No. 315-849 Section 17.43.070 Denial/Revocation of License.***

An On-Site Inspection report completed by Jeff Dickey (Dickey) on 9/17/20, reveals the cultivation area grew from 11,884 sq. ft. in 2019 (Source: On Site Inspection Report dated 7/25/19) to 16,600 sq. ft. in 2020. The canopy size notated by Dickey was 13,000 sq. ft. This is 3,000 sq. ft. over the 10,000 sq. ft. allowed for a Small Outdoor Cannabis Cultivation License and 3,250 sq. ft. over the 9,750 sq. ft. canopy referenced in Attorney Kindermann's letter dated March 5, 2021, as well as, the 2020 Site Map dated 9/17/2020. Dos Santos was given 7 days to achieve the 10,000 sq. ft. canopy. Although for all intent and purposes, by correcting the canopy “deficiency” within 7 days the license is not subject to denial or revocation. Bear in mind, Dos Santos purchased CCL-453 in May 2020. He was the responsible party for the 2020 growing season (even though the license expired in May 2020). After the Sept 17, 2020, on-site inspection, Dos Santos had until September 24, 2020, *the start of harvest season*, to bring the canopy size into compliance. If the compliance officer returns to the Project for re-inspection, it is presumed he is not the person responsible for reducing the canopy. Therefore, it is safe to assume it is Dos Santos who is responsible - so does Dos Santos destroy the excess crop?

Appellants ask the Commission to consider this “deficiency” a flagrant offense which was a choice, not a mistake. Per numerous discussions among county officials at both the Planning Commission and Board of Supervisors meetings, fines are not deterring cultivators from violating the Ordinances. In this case, it appears the risk was worth the reward. As stated previously, Dos Santos is not an inexperienced cultivator. He is a savvy businessman with multiple commercial cannabis cultivation projects in Trinity County. [For the record: Appellants submitted a written request to the Planning Dept to view Dos Santos' project files for his other property CCL-269; access was granted to the 2020 transfer file but not the original file. Access to this specific file was requested to review documented deficiencies that may be relevant to this appeal. At the time of writing, access has not been granted nor have the requested copies been provided.]

It is also worth noting here that odor is a major nuisance at this Project as supported by cannabis complaints filed with the Lead Agency as well as the numerous letters in support of the appeal. No mitigating measures have been taken to address this issue. This outdoor Project has plants the size of trees with a canopy size up to 10,000 sq. ft (the equivalent of 5-7 homes in the Subdivision).

#### **IV. Conclusion**

Prior to Trinity County adoption of the commercial cannabis program, no undesirable, legally operated agricultural projects existed in our lovely rural residential neighborhood. The County has since then

permitted commercial cannabis activities in our backyards without any consideration as to the indirect physical changes these activities would have on our environment, such as new agricultural air quality issues, water quality and availability issues, commercial development and construction noise, changed and increased traffic patterns. Cannabis plants, whether grown indoors or outdoors, produce a distinctive odor that is detectable far beyond property boundaries. There has been an increased number of Cannabis related incidents of burglary, robbery and armed robbery, and acts of violence resulting in injury and homicides in our County. The likelihood that such changes in our neighborhood could occur, which was a preliminary determination Trinity County made without considering the specific circumstances, was more than speculative. The fact that applications are not approved for cultivation of cannabis in any amount or quantity in other major areas of Lewiston exacerbates the conditions in the unprotected areas like our Subdivision. Appellants assert the Ordinances thus became the Project for purposes of CEQA, and hence, required the conduct of an environmental review. (*Authority cited CA Supreme Court Ruling 2019 in the Matter Union of Med. Marijuana Patients, Inc. v. City of San Diego – 7Cal. 5<sup>Th</sup> 1171, 250 Cal. Rptr.; 3D 818, 446 P.3d 317 (2019)*).

For all reasons stated, the Project is not compliant with all the requirements of State laws or all applicable standards established in Ordinance No. 315-843 and Ordinance No. 315-849. Appellants respectfully request that the Commission do the following:

- 1) Take into consideration the public comments submitted with respect to CEQA related impacts this Project is having on the non-cannabis property owners on a site-specific and cumulative basis, as well as the numerous concerns about public safety and crime as a result of cannabis operations in the neighborhood;
- 2) Find that there is sufficient evidence in the record that the Project was *ineligible* for a Class 1 Categorical Exemption from the California Environment Quality Act pursuant to CEQA Guidelines section 15301 (“Existing Facilities”) at the time the license was issued in May of 2018 and remains ineligible;
- 3) Find that the license is inactive and therefore a new application subject to all requirements and conditions set forth by State requirements and County Ordinances; and
- 4) Confidently uphold the Appeal and revoke the license.

Respectfully submitted,

*Laurie Wills*

Friends of the Lewiston Grass Valley Creek

LW  
Enclosures

cc: Staff  
Friends of the Lewiston Grass Valley Creek

**EXHIBIT A**

**From:** Kim Hunter [REDACTED]  
**Subject:** RE: CCL 453 Hearing Date  
**Date:** January 21, 2021 at 11:40 AM  
**To:** L Wills [REDACTED]  
**Cc:** Kristel Bell [REDACTED]; Mary B. Brinkley [REDACTED]



Laurie,  
Thank you for rephrasing the question. Unlike Derek, I was not here nor do I fully understand what exactly occurred in the early years of the Cannabis cultivation program. What I can confirm is that this cultivation license was first issued in May 2018 under Cultivation Ordinance No. 315-830 (adopted in March 2018). It was not one of the first initial licenses issued in the first two years (2016 and 2017) of the program. K.

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**From:** L Wills [REDACTED]  
**Sent:** Thursday, January 21, 2021 11:21 AM  
**To:** Kim Hunter [REDACTED]  
**Cc:** Kristel Bell [REDACTED]; Mary B. Brinkley [REDACTED]  
**Subject:** CCL 453 Hearing Date

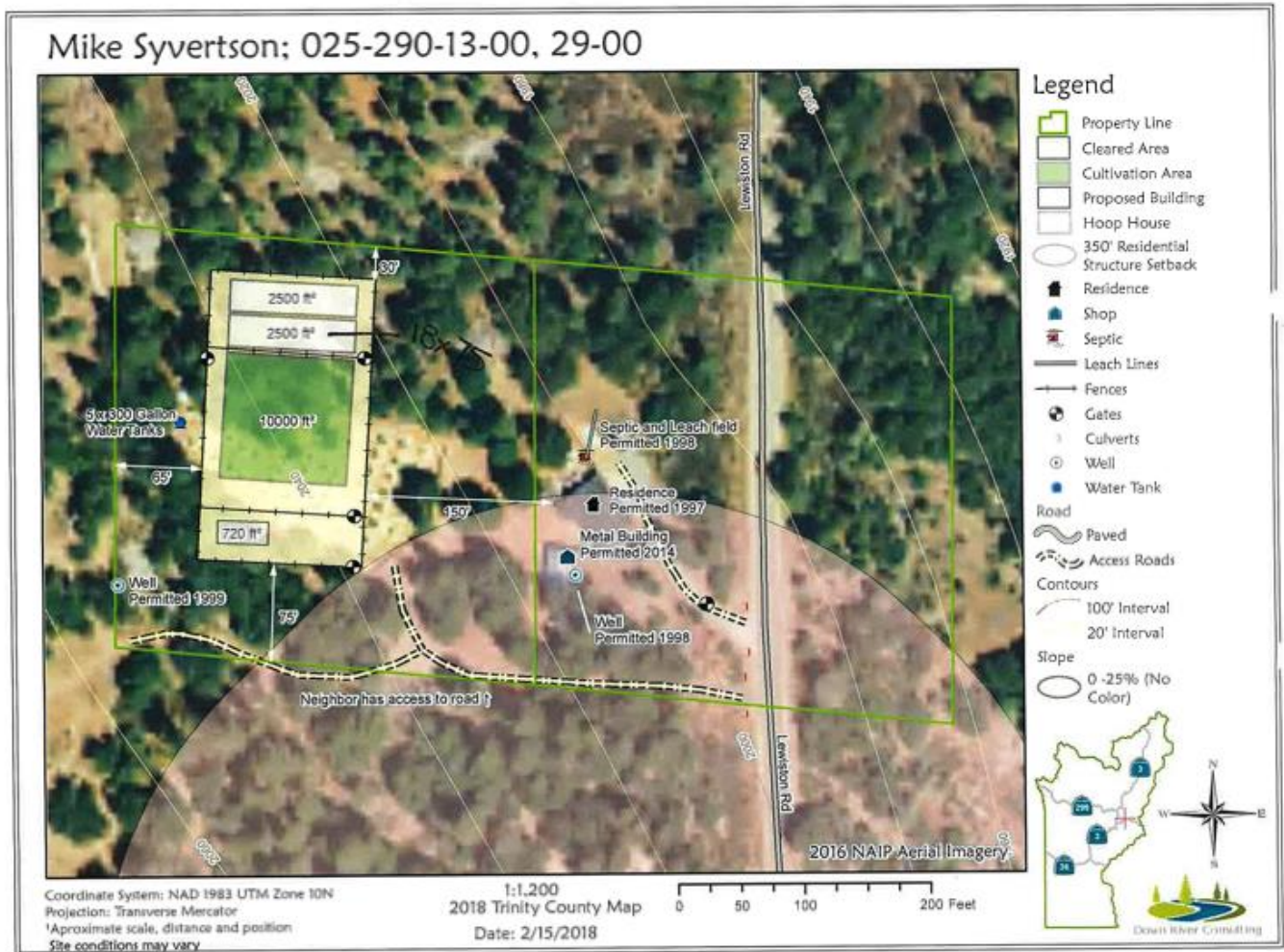
Good morning Kim. I am following up on my email dated Jan 19 wondering when we can expect a reply to this request for information regarding our upcoming appeal hearing? Also I told you in our telephone conversation we had earlier this week that I would resubmit a question I had in about License #453 and whether it was one of the less than 300 licenses issued under the urgency ordinance. There was some confusion about which urgency ordinance I was referring to, so clarification was needed. Accordingly, here is the refrased question:

Was license #453 one of the 281-282 (less than 300) applicants previously under the Water Board Order that were issued licenses under the **initial urgency ordinance** to bring people who had been cultivating into the new program? I am referring to statements Attorney Derrick Cole made at the Oct 9 appeal hearing for CCL-691 (Appellants Ernie and Kristel Bell). Is there some type of documentation you can provide to substantiate #453 was in fact one of the initial 281-282 licenses issued with the categorical exemption; and that the license was not issued outside of these parameters which could suggest the exemption granted to this license was in error.

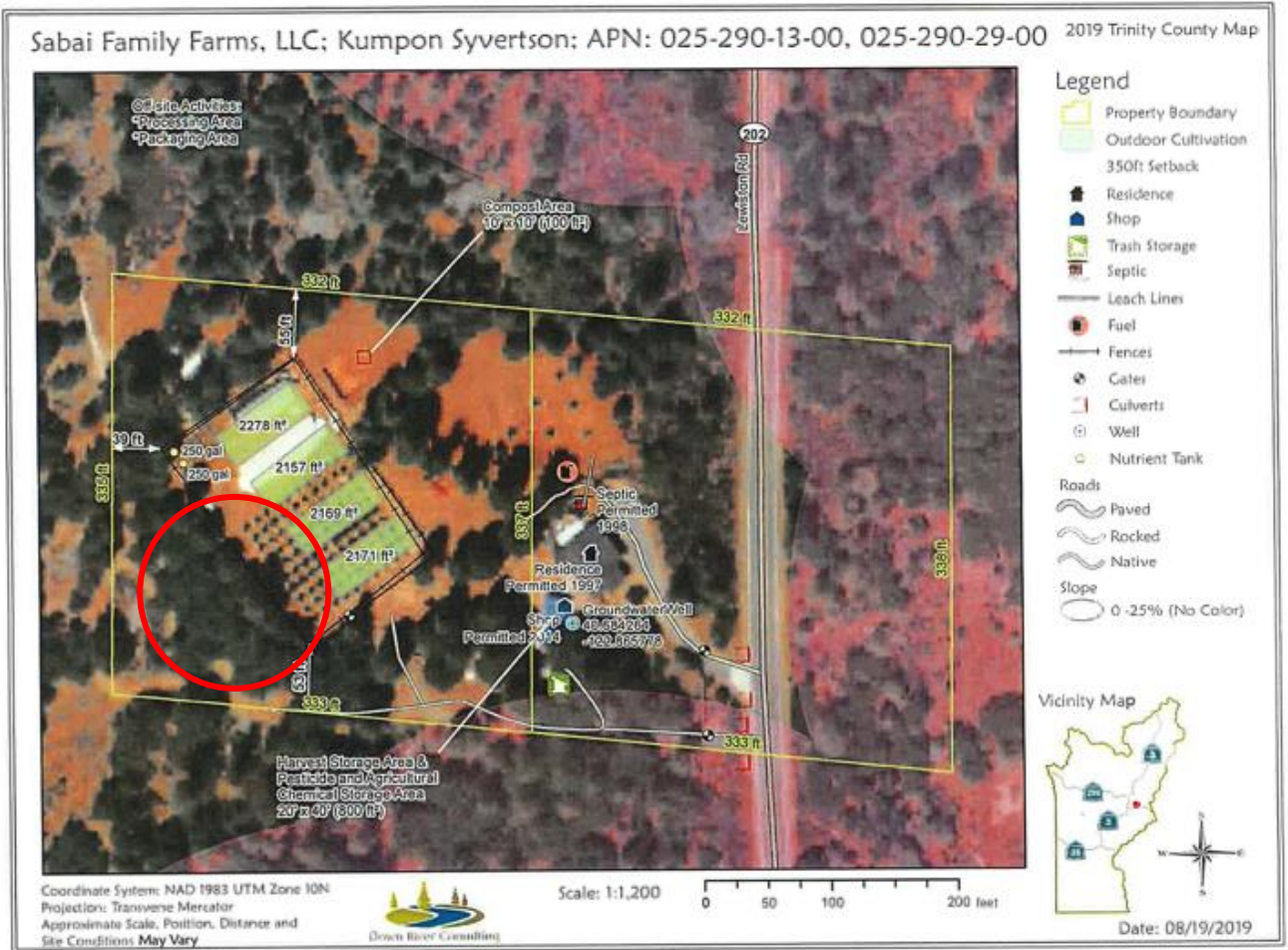
Please respond as soon as possible so we are confident we are dealing with accurate information as we proceed with our appeal.  
Thank you.  
Laurie



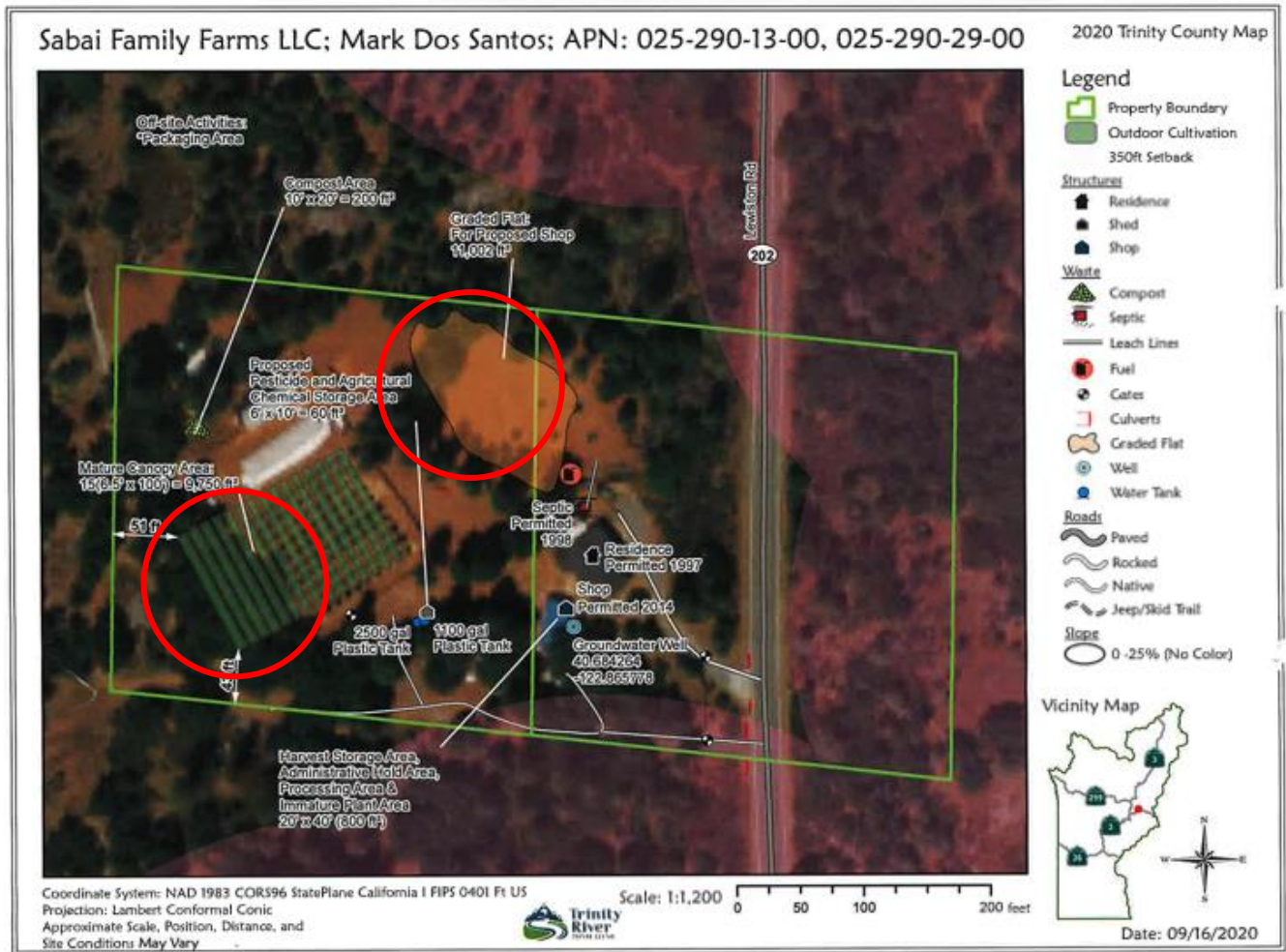
**EXHIBIT B-1**



**EXHIBIT B-2**



**EXHIBIT B-3**



## EXHIBIT C

From: **Kim Hunter** <[REDACTED]>  
Date: Tue, Aug 11, 2020 at 10:16 AM  
Subject: RE: Appeal 2020-453  
To: L Wills <[REDACTED]>  
Cc: Jeff Dickey <[REDACTED]>, Mary B. Brinkley <[REDACTED]>

Hi Laurie,

It matters on the type of work being done. As a landowner does have rights to improve a property. However, if the work is related to the Cannabis cultivation premises then that work should cease. We'll send out a Compliance Officer contact the applicant to check on this to confirm what type of work is being done. K.

**From:** L Wills <[REDACTED]>  
**Sent:** Tuesday, August 11, 2020 9:20 AM  
**To:** Mary B. Brinkley <[REDACTED]>; Kim Hunter <[REDACTED]>  
**Subject:** Appeal 2020-453

Hello Mary Beith and Kim,

Many of us were under the impression (after our meeting at the winery) that when an appeal is filed on the renewal/new CCL, all work /production must cease until a determination has been made at the hearing. Did we misunderstand? The reason I'm asking is there is a lot of activity going on at the location for the above referenced CCL (post filing of our appeal), including bulldozing/excavating. We, The Friends Friends of the Lewiston Grass Valley Creek would like clarification please. Can you please cite or refer us to the language in the Ordinance that either permits or denies such activity.

Thank you so much for your assistance.

Laurie

**EXHIBIT D**



**EXHIBIT E****2020-2021 Cannabis Review Sheet**

Transfer from Michael Syvertson

PAYMENT DATE: 09/11/20		RECEIPT NUMBER: CA2020-512		AMOUNT: \$7,500.00	
APN: 025-290-13-00 & 025-290-29-00		ZONE: RR2.5	GDP: RR	ACRES: 2.5 2.5	FLOODPLAIN: No
CCL NUMBER: 2020-453		PHYSICAL ADDRESS OF SITE: 4790 & 4798 Lewiston Rd., Lewiston			
APPLICANT NAME: Mark Dos Santos			APPLICANT PHONE NUMBER: 530-515-0804		
APPLICANT MAILING ADDRESS: [REDACTED]			APPLICANT EMAIL: tps1877@yahoo.com		
LANDOWNER NAME: Two Saints Real Estate & Development			LANDOWNER PHONE NUMBER: [REDACTED]		
LANDOWNER MAILING ADDRESS: 129 W. Wilson St., Ste. 203, Costa Mesa, CA 92627			LANDOWNER EMAIL: tps1877@yahoo.com		
LICENSE TYPE:		<input type="checkbox"/> Specialty Cottage <input type="checkbox"/> Specialty <input checked="" type="checkbox"/> Small <input type="checkbox"/> Medium			
LIGHTING TYPE:		<input checked="" type="checkbox"/> Outdoor <input type="checkbox"/> Mixed Light <input type="checkbox"/> Indoor			
ENVIRONMENTAL REVIEW COMMENTS:					
SITE INSPECTOR & DATES:		07/25/19 Cody ; 9/17/20 & 9/24/20 JD			
APPLICATION COMPLETE:		X			
NEED COPY:		X			
OWNER PERMISSION:		X			
EASE DOCUMENTS:		X			
DEMOGRAPHIC COPY:		X			
AGENTS AUTHORIZATION:		X			Trinity River Consulting
SITE MAP:		X			
EQA INFORMATION:		X			Project Description
BAA FINAL AGREEMENT:		X			Final
WATER FIRE:					
WATERBOARD WDID OR PAYMENT:		X			1_53CC400373 2018 NOA
WATERBOARD QUESTIONNAIRE:		X			2019 Monitoring Report & Change of Discharger
WATER SOURCE DOCUMENTS:		WP1998 Finaled			Well Test 12/12/17 4.4 gpm
WATER DIVERSION AND USE:		<input type="checkbox"/> Filed <input checked="" type="checkbox"/> Well is over 100' deep <input type="checkbox"/> Not Surface Diversion			
MATERIALS LIST:		X			
BUSINESS DOCUMENTS:		<input checked="" type="checkbox"/> AOI <input checked="" type="checkbox"/> DISC <input checked="" type="checkbox"/> BOE			Sabon Family Farms, LLC
MP/WRPP if NOT Provided Due Date:		X			SMP
CANNABIS WASTE MGMT PLAN:		X			
WELLING: BP11627		<input checked="" type="checkbox"/> Finaled <input type="checkbox"/> In Progress <input type="checkbox"/> No Plans Submitted			
WELL / DUP:		<input type="checkbox"/> YES <input type="checkbox"/> NO			
OPTIC: SP1997-068		<input checked="" type="checkbox"/> Finaled <input type="checkbox"/> In Progress <input type="checkbox"/> No Plans Submitted			
BUS STOP/CHURCH/YOUTH FACILITY CHECK:		if yes, check box: <input type="checkbox"/> Bus Stops <input type="checkbox"/> Church <input type="checkbox"/> Youth Facility			
VARIANCE:		<input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required		VARIANCE RENEWAL: <input type="checkbox"/> Required <input type="checkbox"/> Not Required	
APPLICATION SUBMITTED:		<input type="checkbox"/> YES <input type="checkbox"/> No			
COMPLETENESS REVIEW:		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		SMARTGOV: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO    Date: 09/11/20	
QA DETERMINATION:		CE <input checked="" type="checkbox"/> OR <input type="checkbox"/> PROV <input type="checkbox"/>		PUBLIC NOTICES SENT: <input type="checkbox"/>	
APPEAL PERIOD ENDED:		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO    Date: 08/06/20		LICENSE ISSUED	

**EXHIBIT F**

CCL 453

Applicant Mark Dos Santos

**Administrative Deficiencies**

Items Needed	Item / Required	Initial Email Sent Date	Date Resolved	Items Needed	Item	Initial Email Sent Date	Date Resolved
	Application						
	Agent Authorization			✓	Materials <i>May need updated</i>	9/14/20 ML	9/17/20 MB
	Deed				CDFW LSAA		
	Owner Permission			✓	WDID Number <i>Change of Discharge</i>	9/14/20 ML	9/17/20 ML
	Lease			✓	SWRCB Questionnaire <i>209 Monitoring</i>	9/14/20 ML	9/17/20 ML
	ID				Diversion		
	Site Map				SMP		
	Well				WMP		
	Well Test & Bacterial test			✓	Project Discription	9/14/20 ML	9/16/20 MB
	Septic			✓	Seller's Permit & AOI	9/14/20 ML	9/16/20 MB
✓	Building <i>BP 2018-063 Electrical upgrade - 400 amps</i>	9/14/20 ML		✓	<i>Business Disclosure</i>	9/14/20 ML	9/17/20 ML
				✓	<i>Business Disclosure for Two</i>	9/14/20 ML	9/17/20 ML

**Site Inspection Deficiencies**

Items Needed	Item	Initial Email Sent Date	Date Resolved	Items Needed	Item	Initial Email Sent Date	Date Resolved
	Building, Fire & Zoning Setbacks				Dwelling		
	Riparian Setbacks				Director's Use Permit		
	Variance Required				Distance from Waterways		
	Cultivation Area Defined				In a Flood Zone		
	Total Cultivation Area				Water Source		
	Hoop Houses				Water Storage		
	Greenhouses				Update Plot Plan		
	Permitted Structures						
	Unpermitted Structures						
	Proposed Structures						
	Septic Installed						

**Other Deficiencies**

Items Needed	Item	Initial Email Sent Date	Date Resolved	Items Needed	Item	Initial Email Sent Date	Date Resolved
	DUP						
	CC Variance						
	EH Review						
	CEQA						
	Grading Permit						
	Less Than 3 Acre Conversion Exemption						