

Exhibit A

Language to add to the Project Description:

The operator will hire a qualified odor expert to develop an Initial VOC Testing Study (“Study”) to characterize site conditions and areas of projected maximum offsite odors using analytical equipment. This analysis will occur during the first seven days of each season’s harvest (e.g., twice per year if 2 harvests) in two of the next three years (2021-2023) to assess odor issues before and after odor control equipment is employed. The minimum requirements for the Initial VOC Testing Study shall be as follows:

1. A minimum of twelve locations will be chosen by the qualified odor expert to be tested daily over various times of the day; and,
2. The Study will be designed and conducted to incorporate corresponding weather data.

Language to add to the SOP:

Per the odor abatement plan addendum, the operator will conduct a best available control technology (BACT) analysis upon the receipt of a 2nd substantially complete complaint. The goal of the BACT analysis will be to identify the source of the odors and institute effective actions to contain cannabis odors on the premises to the greatest extent feasible. The analysis may include:

- additional VOC testing,
- analysis of strains planted,
- location of plantings,
- analysis of the vapor phase system and mixture used,
- analysis of improvements to the carbon filtration systems,
- analysis of improvements to the processing warehouse building,
- analysis of wind screen utilization, and
- other measures as found appropriate by the odor control expert performing the analysis.

In addition to the noticing requirement for property owners and residents within 1,000 feet of the site, the operator will add any individual or organization that has a member who shows proof of residency within the Buellton zip code to the CCA Community Outreach List. The operator will send out reports every 6 months to those on the Outreach List that contain information on planting schedules, information on odor complaints and resolution, any improvements made to the OAP, and updated contact information for the designated contact person to respond to odor complaints.