	PLANNING & DEVELOPMENT APPEAL FORM						
SITE ADDRESS:_							
ASSESSOR PAR							
Are there previous	permits/app	olications?	⊡no ⊠yes num	bers:		00-00064 nit# & lot # if tract)	
Is this appeal (pote	entially) relat	ed to canna	bis activities?	no 🖾 y	es		
Are there previous	environmer	ntal (CEQA)	documents? □n	o 🛛 yes	s numbers: <u>S</u> PEIR 17EII	ect. 15162 and 15168(c) R-00000-00003 and SCH No. 20170	7106
1. Appellant: <u>Sa</u>						FAX:	
ivialling Address	Street	City	Iton, CA State	Zip	E-mail:		
2. Owner: Scott						FAX:	
Mailing Address:	7660 Fay Street	Street, #H-24	7, La Jolla, CA 920 State)37 Zip	E-mail:		
		•		•		FAX:	
						FAX: (805)965-5950	
					lconlan@cappellonoel.com		
	Street	City	State	Zip			
					,		

COUNTY USE ONLY

Case Number:	Companion Case Number:
Supervisorial District:	Submittal Date:
Applicable Zoning Ordinance:	Receipt Number:
Project Planner:	Accepted for Processing
Zoning Designation:	Comp. Plan Designation

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X BOARD OF SUPERVISORS

PLANNING COMMISSION: ____COUNTY _____ MONTECITO

RE: Project Title _____ Santa Barbara West Coast Farms, LLC

Case No. 19APL-00000-0007

Date of Action December 4, 2019

I hereby appeal the _____approval _____approval w/conditions X __denial of the:

Board of Architectural Review – Which Board?

Coastal Development Permit decision

Land Use Permit decision

X Planning Commission decision – Which Commission? COUNTY Commission denying LUP

Planning & Development Director decision

Zoning Administrator decision

Is the appellant the applicant or an aggrieved party?

X Applicant

Aggrieved party – if you are not the applicant, provide an explanation of how you are and "aggrieved party" as defined on page two of this appeal form:

Reason of grounds for the appeal – Write the reason for the appeal below or submit 8 copies of your appeal letter that addresses the appeal requirements listed on page two of this appeal form:

- A clear, complete and concise statement of the reasons why the decision or determination is inconsistent with the provisions and purposes of the County's Zoning Ordinances or other applicable law; and
- Grounds shall be specifically stated if it is claimed that there was error or abuse of discretion, or lack of a fair and impartial hearing, or that the decision is not supported by the evidence presented for consideration, or that there is significant new evidence relevant to the decision which could not have been presented at the time the decision was made.

Please refer to the enclosed Applicant Letter.

Specific conditions imposed which I wish to appeal are (if applicable):

a.	Please refer to the enclosed Applicant Letter.	
b.		
с.	1	
d		

Santa Barbara County Appeal to the Board of Supervisors or Planning Commission Application

Please include any other information you feel is relevant to this application.

CERTIFICATION OF ACCURACY AND COMPLETENESS Signatures must be completed for each line. If one or more of the parties are the same, please re-sign the applicable line.

Applicant's signature authorizes County staff to enter the property described above for the purposes of inspection.

I hereby declare under penalty of perjury that the information contained in this application and all attached materials are correct, true and complete. I acknowledge and agree that the County of Santa Barbara is relying on the accuracy of this information and my representations in order to process this application and that any permits issued by the County may be rescinded if it is determined that the information and materials submitted are not true and correct. I further acknowledge that I may be liable for any costs associated with rescission of such permits.

Lawrence J. Conlan	12/12/19
Print name and sign - Firm Cappello & Noël LLP	/ Date
Lawrence J. Conlan	12/12/19
Print name and sign – Preperer-of-this form Cappello & Noël LLP	/ Date /
Scott Rudolph	12/12/19
Print name and sign – Applicant Santa Barbara West Coast Farms, LLC	Date
Print name and sign – Agent	Date
Print name and sign – Landowner	Date

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Form Updated September 20, 2019



LAWRENCE J. CONLAN

December 12, 2019

Via Hand Delivery

Santa Barbara County Board of Supervisors 105 East Anapamu Street, Suite 407 Santa Barbara, CA 93101

Re: Santa Barbara West Coast Farms, LLC Appeal of Planning Commission December 4, 2019 Denial of Land Use Permit for Cannabis Cultivation W Highway 246, Buellton, CA; APN 099-240-067 (Planning Commission Case No.: 19LUP-00000-00010)

Dear Chair Lavagnino and Honorable Supervisors:

This law firm represents Santa Barbara West Coast Farms, LLC (West Coast Farms), which the Santa Barbara County Planning Department Director previously approved for a Land Use Permit to cultivate cannabis. West Coast Farms is located on the south side of State Highway 246, approximately 3.3 miles west of Highway 101, on a property designated Agriculture II (AG-II) and fully surrounded by other AG-II properties.

As set forth in its Land Use Permit application materials, West Coast Farms will upgrade an existing farm historically used for row crops to a cannabis farm using organic practices that will conform seamlessly to the agricultural interests of the community and contribute to the local economy. The farm will deploy best management practices for farming in general, and for cannabis in particular, which will improve soil conditions, reduce the need for fertilizers, address pest issues without sprays or traditional pesticides, and conserve water using drip irrigation. The farm is designed to adopt progressive farming methods that acknowledge the public's interest in clean, water efficient, odor-free and healthy farming. The farm will be visually appealing and completely in harmony with the local community, with minimal structures and a natural architectural and landscape aesthetic.

Finally, it will contribute to the overwhelmingly positive economic impact of the cannabis industry on the County and its residents.

West Coast Farms' Land Use Permit Application is fully compliant with all laws and county ordinances and plans. After the Director approved the permit, it was appealed, and twice the Planning Department staff recommended approval of the permit and denial of the appeal. On December 4, 2019, however, after approving Land Use Permits for similar projects at two nearby farms, the Planning Commission inexplicably voted to deny West Coast Farms' permit.

West Coast Farms now appeals the denial of its Land Use Permit to the Board of Supervisors. The appeal is subject to a *de novo* standard of review. On review, West Coast Farms will establish that its application is fully compliant with all applicable laws and community plans governing Land Use Permits, and that the permit should be approved. In addition, the record will show that the decision by the Commission lacked any rational basis, that the Commission abused its discretion and conducted an unfair hearing, that its decision to deny is not supported by evidence, and that the denial is arbitrary, capricious and unconstitutional.

There are serious legal problems with the Commission's denial of West Coast Farms' Land Use Permit, and we believe County Counsel should review the Commission's conduct with regard to this application, and others, for cannabis cultivation. This would ensure that when the Board reviews this application there is a clear understanding of how the Commission defectively handled it so that similar mistakes and illegal treatment may be avoided during the Board's review. West Coast Farms requests that its Land Use Permit be approved, so that it may be allowed to cultivate cannabis at its property as contemplated and allowed under existing law.

Procedural Background

West Coast Farms applied for a Land Use Permit on February 8, 2019. The Director approved the application on April 26, 2019. Blair Pence, a nearby winegrower, then appealed to the Planning Commission. The Planning Department staff twice recommended the appeal be denied and that the permit should be approved. The staff's recommendations were made after thoughtful and

careful consideration, and were consistent with the applicable laws governing Land Use Permits for cannabis cultivation.¹

At approximately the same time Mr. Pence appealed the West Coast Farms permit, he appealed two other similar projects, Busy Bee's Organics and Santa Rita Valley Ag., Inc. Both farms are nearby West Coast Farms' property. On November 6, 2019, at the same hearing when Pence's appeal of West Coast Farms was heard, the Commission voted 3-2 in favor of Santa Rita Ag's Land Use Permit, with certain conditions attached. The following day, the Commission voted 5-0 in favor of the Land Use Permit for Busy Bee's Organics, also with conditions attached.²

Like the other farms, West Coast Farms fully and completely complied with all applicable laws, ordinances, and community plans in its application for a Land Use Permit. The permit was properly approved by the Director and strongly affirmed by the Department staff. Despite that, and despite the proximity of West Coast Farms to the other two farms, the similarities in proposed use, the similarities in proposed state of the art farming methods, and the similarities in landscape design, the Commission unjustifiably and improperly denied West Coast Farms' permit, voting 3-2 against, and continuing the hearing, without offering approval subject to similar conditions imposed upon the other two applicants. The Commission was unable to articulate any specific provisions of the applicable ordinances or community plans with which West Coast Farms purportedly did not comply, so it instead instructed the staff to make findings to support its denial, pointing vaguely to general land use "goals and policies" concerning agricultural compatibility. Contrary to that ambiguous notion, there are no goals and policies, nor any legitimate factual bases the Commission could or ultimately did identify that justify its denial.

¹ West Coast Farms incorporates and adopts the prior findings, conclusions, reports and recommendations of the Planning Department Director and Staff dated April 26, 2019, June 6, 2019, and November 6, 2019.

² The conditions attached to the permits of the other applicants were objectively onerous, inconsistent with the LUDC, and beyond the discretion of the Commission. For example, the Commission arbitrarily limited to 30% of the parcel size the amount of acreage on which cannabis may be grown. There is no logical justification for this reduction, no evidentiary support for it, and it fails to consider the economic effect of such a forced reduction in grow on the property owner. No such conditions or restrictions exist in the LUDC; the only relevant acreage restriction, LUDC sec. 35.42.075(B)(5), requires that cannabis cultivation must take place on lots *larger* than 20 acres. As such, the Commission is without authority to impose such conditions on a Land Use Permit for cannabis cultivation.

At the continued hearing on December 4, 2019, the Commission was presented with the law concerning its limited discretion for Land Use Permits, its unconstitutional and unequal treatment of West Coast Farms compared to other farms, the obvious deficiencies in the new report it forced staff to generate, and newly available scientific evidence that completely debunked the purely speculative concerns about "cumulative effect" of the clustering of cannabis grows, or potentially harmful terpenes. The Commission disregarded the law and the evidence, however, and formally voted to deny the permit. The Commission's decision was improper by every measure, and it was a plain violation of West Coast Farms' constitutional rights.

Upon the filing of this appeal, the Commission's decisions on all three of the above-mentioned Land Use Permits for outdoor cannabis cultivation, and probably others, will be on appeal to the Board of Supervisors. As the Board will see, the Commission acted *ultra vires* in attaching conditions to the two other projects, and its decision on West Coast Farms' application was entirely inconsistent with the LUDC, the community plans, state and constitutional law, and its own practices.

West Coast Farms' Application for a Land Use Permit Is Complete and Fully Compliant.

West Coast Farms is precisely the type of project the County contemplated when the cannabis ordinances were passed and the PEIR was certified. The farm will reflect the visual aesthetic of the valley, it will have no adverse impact on existing agricultural uses, it will apply progressive farming methods, it will preserve our precious water supply, and it will contribute to the positive economic growth of the County.

West Coast Farms Will Be Visually and Aesthetically Consistent with the Santa Ynez Valley.

Visually, this farm will be an improvement from the most recent agricultural uses. The local community and tourists in the area will be pleased to see it transform from a simple row crop parcel using outdated agricultural methods to a lush, green farm bordered by native landscaping, much like other nearby farms and vineyards. The landscaping will shield the fencing that secures the perimeter of the farm, as well as the odor abatement system that will be installed (discussed below). Additional security will be provided with the installation of minimally

intrusive downward facing motion sensor lighting and onsite security cameras, monitored appropriately by onsite security. The design and visual appeal will be entirely consistent with character of the community and will be virtually indistinguishable from the vineyards in the area.

The farm will only have a few structures, all well-designed by an architectural firm that has designed wineries and tasting rooms throughout California. The farm itself is approximately 73 acres in total size, which will include 45 acres of outdoor cannabis plants and 5 acres used as a nursery for young plants. It has an existing well that will supply water for all purposes, and the farm will include an onsite wastewater treatment system for the water used for nonagricultural purposes. The property line nearest the Santa Ynez River is a distant 500 feet away. There will be ample parking onsite to accommodate the operations, including an ADA parking stall. Hours of operation are limited to daytime hours, and a Site Transportation Demand Management Plan will be in place that includes ridesharing incentives and compressed work schedules for employees. The property sits inside the boundaries of the Santa Ynez Valley Community Plan, and the farm will operate consistently with the goals and policies of that Plan, including through use of a state-of-the-art odor abatement system and building design. In sum, this farm will enhance the local community at every level. Copies of the architectural renderings of the farm are attached hereto as Exhibit A.

West Coast Farms Will Eliminate Potential Odor Impacts and So-called "Cumulative Impacts."

One of the beneficial characteristics of this farm is that it is designed for producing cannabis oil. Growing cannabis for oil enables West Coast Farms to negate virtually all theoretical concerns about odor and so-called "cumulative impacts." The farm's plants will be harvested twice a year, with a total harvest time of approximately a month. When the plants are cut, they will be moved immediately inside one of the buildings which will house a cryogenic freezer for packaging the plants. So, except for the initial and brief period of time when the plants are first cut, there will be essentially no other harvesting on site. Rather, the crops will be frozen and sealed before being transported away to a different location to be processed for oils. There will be virtually no opportunity for detectible, traceable odor. Nevertheless, to ensure that all concerns about odor are addressed and eliminated, the farm will include a state-of-the-art odor abatement

system by Byers. The details of the Byers vapor system, which will be regularly monitored, are set forth in the application materials attached as Exhibit B.

The Land Use Permit Was Properly Approved on April 26, 2019 and Was Vigorously Defended Twice by the Department Staff.

Though the Board will review this appeal *de novo*, a brief description of the scope of Mr. Pence's appeal will help the Board understand the real issues and where the Commission appears to have been distracted by red-herring arguments presented by Mr. Pence.³ Mr. Pence's appeal was based on the following issues: lack of notice, odor, increased traffic, biological impacts (in particular the California Tiger Salamander, reduced property values, noise, cumulative impacts and setbacks from the Santa Ynez River, and inadequate conditions of approval. Though the scope of Mr. Pence's appeal was narrow, he subsequently expanded it to include additional arguments concerning environmental review issues not appropriate for a Land Use Permit with a certified PEIR in place. None of his arguments have any merit, and none were supported by legitimate evidence.

In response to the issues that Mr. Pence raised, the Department staff prepared a report that confirmed the initial findings and recommended denial of the appeal. In addition to the initial findings and CEQA checklist, the staff report addressed and specifically rejected each of the points raised in Mr. Pence's appeal. The Staff Report originally recommended that the Planning Commission:

- 1. Deny the appeal.
- 2. Make the required findings for approval as set forth in Attachment A of its report.
- 3. Determine that the PEIR is adequate and that no subsequent environmental review is required per CEQA Guidelines sections 15162 and 15168(c)(2).
- 4. Grant de novo approval of the proposed project, subject to the conditions include din Attachment B of the report.

The original checklist confirmed that West Coast Farms' farm is within the scope of the PEIR certified by the Santa Barbara County Board of Supervisors on

³ By way of background, Mr. Pence is the individual who is attempting to wage a misguided war on the emerging cannabis industry and has filed or funded numerous appeals of approved cannabis cultivation permits in Santa Barbara County.

February 6, 2018.⁴ The reason the PEIR is appropriate here and the reason the farm was originally approved is plain to see – this is not a complicated project that involves a substantial number of buildings, that reflects development inconsistent with or out-of-character from the community, that changes the use of the land or that interferes with or in any way negatively impacts property owned by Mr. Pence or others. On November 6, 2019, the staff reiterated its support for West Coast Farms on all issues, and again recommended the permit be approved.

The Department staff's original findings and conclusions, and additional vetting of the issues raised on appeal, are critical guidance to the Board for a very important reason - Mr. Pence had no legitimate evidence to support his appeal. The appeal, and the issues that the Commission ultimately tried to identify as bases for denial, are based on pure supposition and speculation, but no facts.

The Commission's Denial of the Permit Was Illegal, Was Inconsistent with the Planning Department's Prior Comprehensive Approval, and Was Inconsistent with the Commission's Own Approval of Nearby Farms.

When the Commission decided to deny West Coast Farms' Land Use Permit, it could barely articulate why. Even after lauding the visual aesthetic of West Coast Farms, including its architectural design and landscaping, the Commission instructed the staff vaguely to search the general plan and the Santa Ynez Valley Community Plan and to essentially "find a reason" related to agricultural "compatibility" that might support the Commission's denial of the permit. The staff report solicited by the Commission makes only a few specific factual findings, limited to the notion that the landscaping, when considered along with the approved Santa Rita Ag. landscaping two parcels to the west, could interfere with the view from the Highway 246 corridor. In other words, the Commission senselessly penalized West Coast Farms simply because it is nearby another grow the Commission contemporaneously approved.

The report solicited by the Commission also refers generally to certain provisions of the Comprehensive Plan, including the Agricultural Element and the Santa Ynez Valley Community Plan. The report in turn offers notations about *potential effects* on "visual and aesthetic resources," "agricultural resources," and "odor." The Commission essentially forced the staff to reverse itself on prior

⁴ Mr. Pence long-ago waived challenge to the PEIR certified by the County Board of Supervisors in early 2018, and the conjecture about the compatibility of cannabis farming in general that reflects outdated perceptions of cannabis and agricultural methods in general.

findings supporting the visual and aesthetic aspects of the farm, the prior findings about agricultural compatibility, and prior approval of West Coast Farms odor abatement system (which no other project has proposed as part of its baseline application). Again, the staff report is largely framed in terms of "potential" conflicts with the plan policies, rather than actual conflicts. This is improper and demonstrates, on its face, that there is no substantial factual evidence to support the denial.

Rather than being approved like the two similarly-situated nearby farms, West Coast Farms was penalized and tagged with a so-called "cumulative effect" from those farms. It is patently illegal for the Commission to deny West Coast Farms' permit on that basis. Any concern about clustering of cannabis farms has already been addressed and accounted for in the PEIR, which was certified almost two years ago. The alarmist and inaccurate messaging about agricultural compatibility put forth by Mr. Pence, and which has evidently distracted the Commission from its core duties, was addressed during the PEIR that was certified, and which Mr. Pence and his contingent never challenged at that time.

More importantly, the outcry about cumulative impacts and speculation about the effect of cannabis terpenes on grapes was factually unsubstantiated before and now has been completely debunked. The misdirection about terpenes offered by the anti-cannabis groups relies on passing references to studies of the compatibility of grapes with eucalyptus or other nearby crops dating back to before 2010 and which is inapposite to the situation at hand. Fundamentally, if that evidence supported the arguments of the anti-cannabis crusaders, the time to present it was during the PEIR process. That time has passed.

New scientific evidence is now available that completely disproves those inaccurate and untimely theories. This new evidence includes a recent study of terpene drift that concludes there is virtually zero likelihood that grapes would absorb terpenes from cannabis strains, and which could only occur when cannabis is harvested year-round for multiple consecutive years, which is not the case for West Coast Farms or any other known farm. In addition, as it relates to Pence's grapes specifically, scientific lab analysis has been conducted that demonstrates that cannabis grown next to his property several years ago had zero effect on his grapes grown at the same time. See Exhibit C.

The Law Requires that West Coast Farms' Land Use Permit Be Approved.

Any agency decision to deny a permit must be based on "substantial evidence." *Desmond v. County of Contra Costa* (1993) 21 Cal.App.4th 330, 335-336. "Substantial evidence has been defined in two ways: first, as evidence of 'ponderable legal significance . . . reasonable in nature, credible, and of solid value' and second, as 'relevant evidence that a reasonable mind might accept as adequate to support a conclusion." *Id.* "[R]egulation of property 'effects a taking if [it] does not substantially advance legitimate state interests." *Agins v. Tiburon* (1980) 447 U.S. 255, 260. In this instance, there was not substantial evidence to support a decision by the Commission to deny West Coast Farms a Land Use Permit. The decision is based, at best, on potential and theoretical impacts, which amount to inadmissible speculation.

There is no restriction or requirement in the LUDC or the Comprehensive Plan which prevents cannabis cultivation from taking place adjacent to vineyards. The Commission had no right to deny the permit on that basis. Contrary to the Commission's reasoning, Policy I.B. of the Agricultural Element of the Comprehensive Plan expressly requires that "[t]he County shall recognize the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions."

In sum, West Coast Farms is *entitled* to the land use for which it applied because the legislature already determined that cannabis cultivation *is compatible with surrounding uses* when it made cannabis cultivation in an AG-II zone a *permitted* use. Per the LUDC there is no basis that the Commission could articulate, absent failure of the original application to comply with the LUDC or the Comprehensive Plan, which would enable it to deny the Land Use Permit. *Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1184; *Land Waste Management v. Contra Costa County Bd. of Supervisors* (1990) 222 Cal.App.3d 950, 957-958.

The County cannabis ordinance and the certified PEIR are now the law of the land, and the Land Use Permit originally approved for West Coast Farms should be approved by the Board because its application is complete and fully compliant with the law. Our client will not accept arbitrary and capricious conduct by a government agency that violates its constitutional rights.

The Economic Upside of Cannabis in Santa Barbara County is A Critically Important Consideration.

Finally, a key consideration for every potential cannabis project in Santa Barbara County, including this farm, is the positive economic impact the industry will have. This impact cannot be overstated and should be a significant consideration in the analysis of every Land Use Permit application. The UCSB Economic Forecast Project, led by Dr. Peter Rupert, UCSB economics professor and former Chair of the Economics Department, has done a preliminary analysis of the positive monetary impacts of cannabis in Santa Barbara County.⁵ Based on studies of existing growers, his team has determined that the cannabis industry buys locally (in Santa Barbara County) goods and services (output) worth \$785,000 per year per cultivated acre. Using a baseline of 156 acres legally cultivated in the county, this amounts to direct purchases from the local economy of \$122.5 million, generating approximately \$169.3 million worth of output, for a total direct output impact of \$291.8 million. In addition, the number of jobs generated leads to an estimated \$215.8 million worth of output produced by the cannabis industry. The total economic impact of the industry is estimated at \$458.3 million, almost half a billion dollars in positive economic impact from this new industry, based on existing legal farms alone, at the 2018 level.

Looking ahead, and multiplying that economic output by the number of legal acres of grow that will be allowed in the County, the projected future prospect of nearly \$4 billion per year in economic impact from the local cannabis industry should not be ignored by any County department that issues or approves permits. West Coast Farms is but one of the prospective major contributors to this economic boom for the County and the local community.

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⁵ See Initial Impact report at https://efp.ucsb.edu/Cannabis/implan_InitialAssessment.pdf

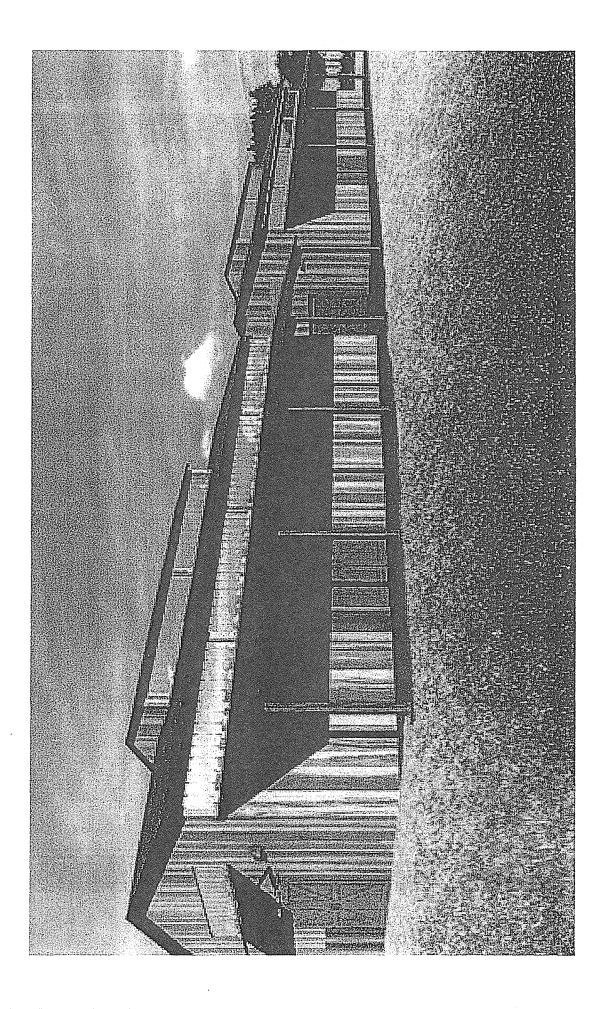
Conclusion

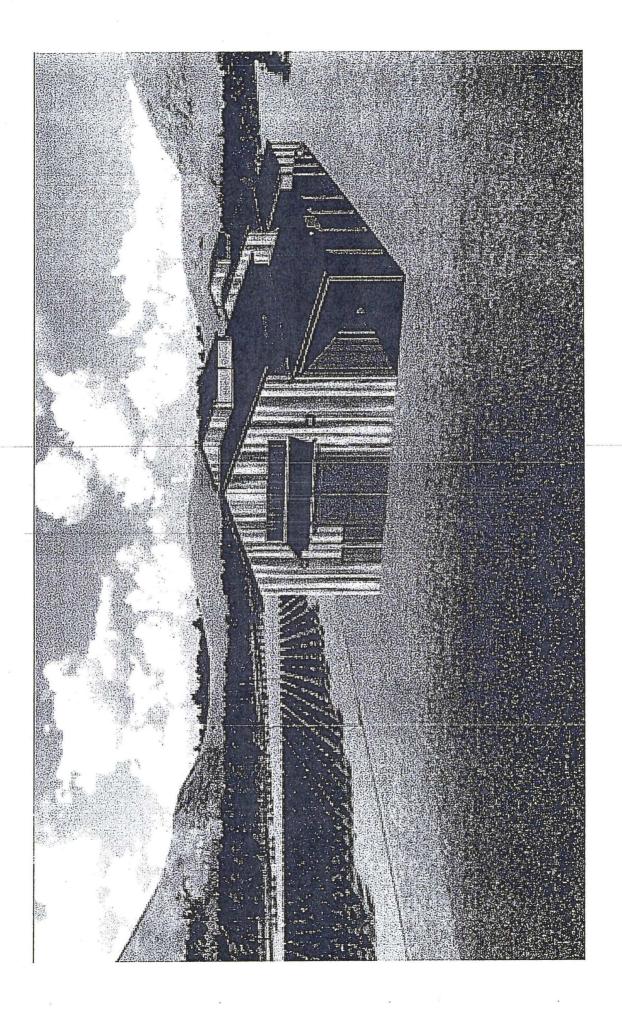
The Commission improperly denied West Coast Farms' Land Use Permit. It failed to follow existing law and exceeded its authority. There is zero factual basis to support any of the issues raised in Pence's appeal or in the Commission's decision to deny the permit. Cannabis is legal in the State of California and the County of Santa Barbara. West Coast Farms' application fully complies with the requirements of the LUDC and all provisions of the community plans. We request that its Land Use Permit be approved.

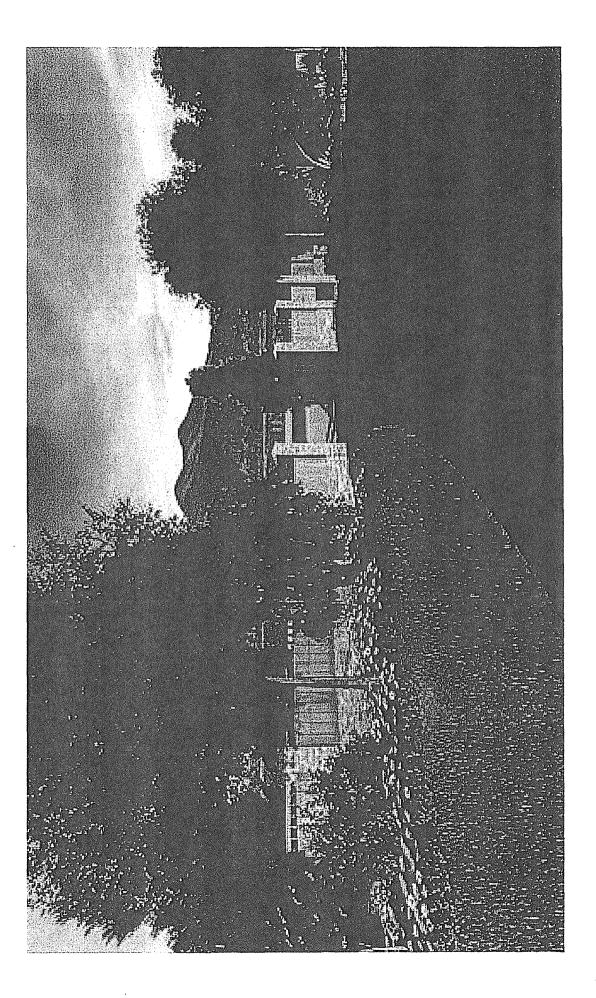
Sincerely,

CAPPELLO & NOËL LLP Lawrence J. Conlan

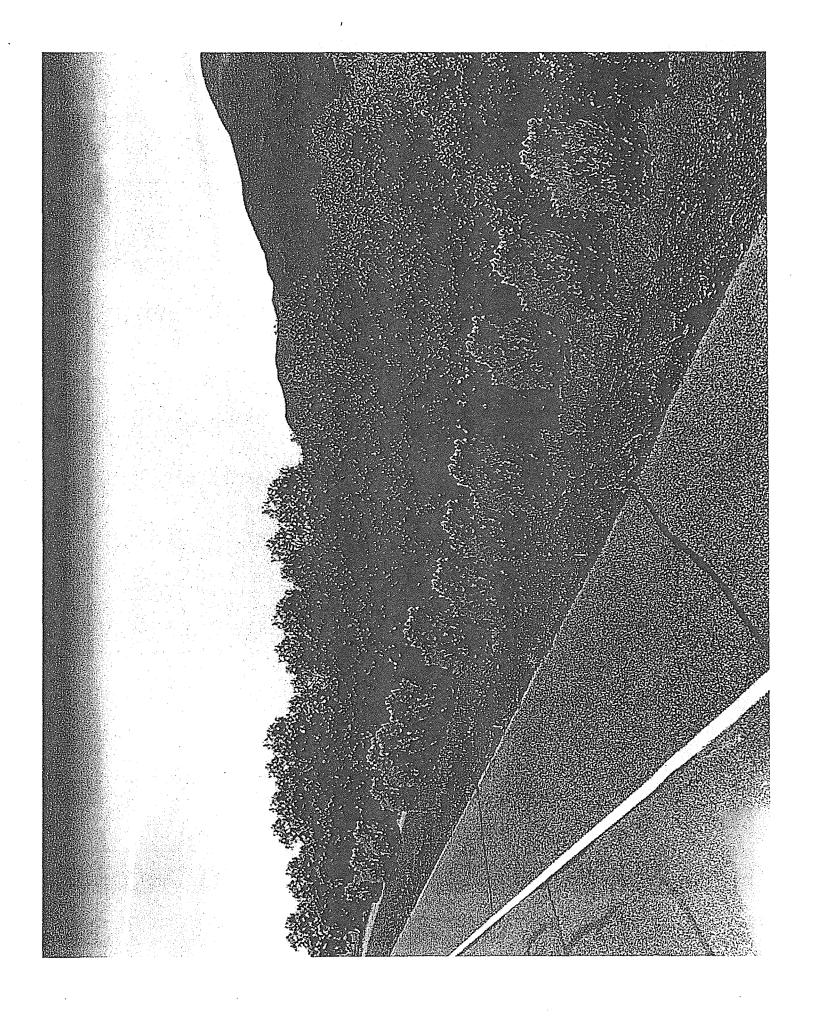
Exhibit A











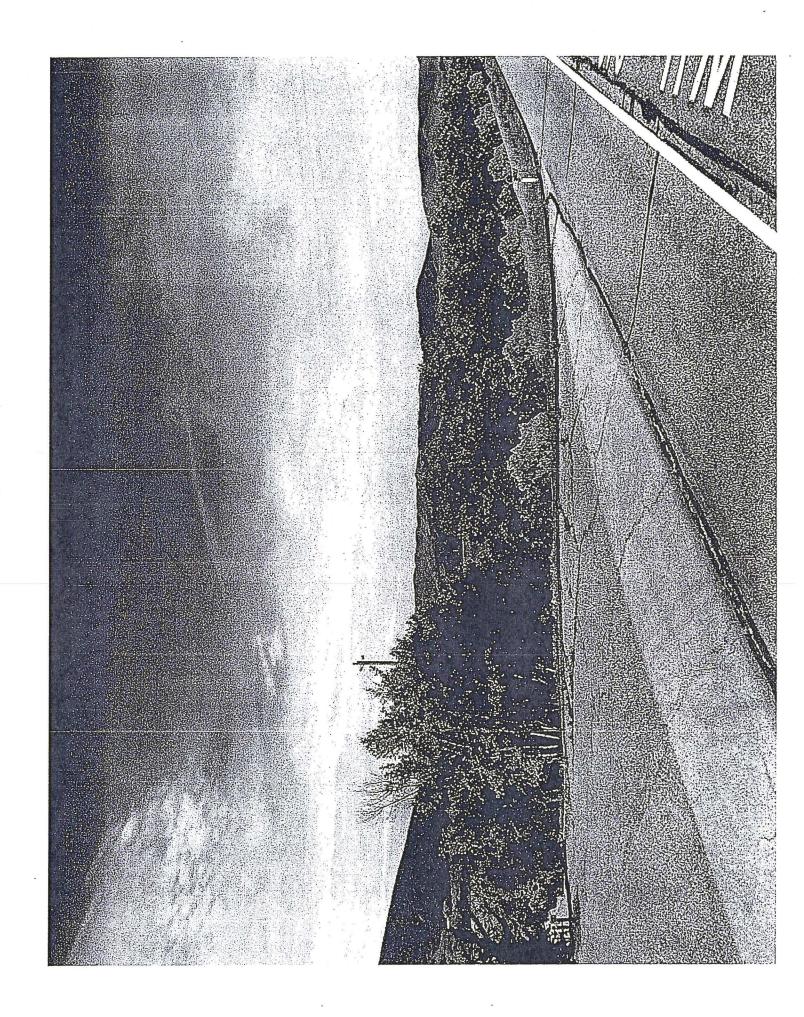
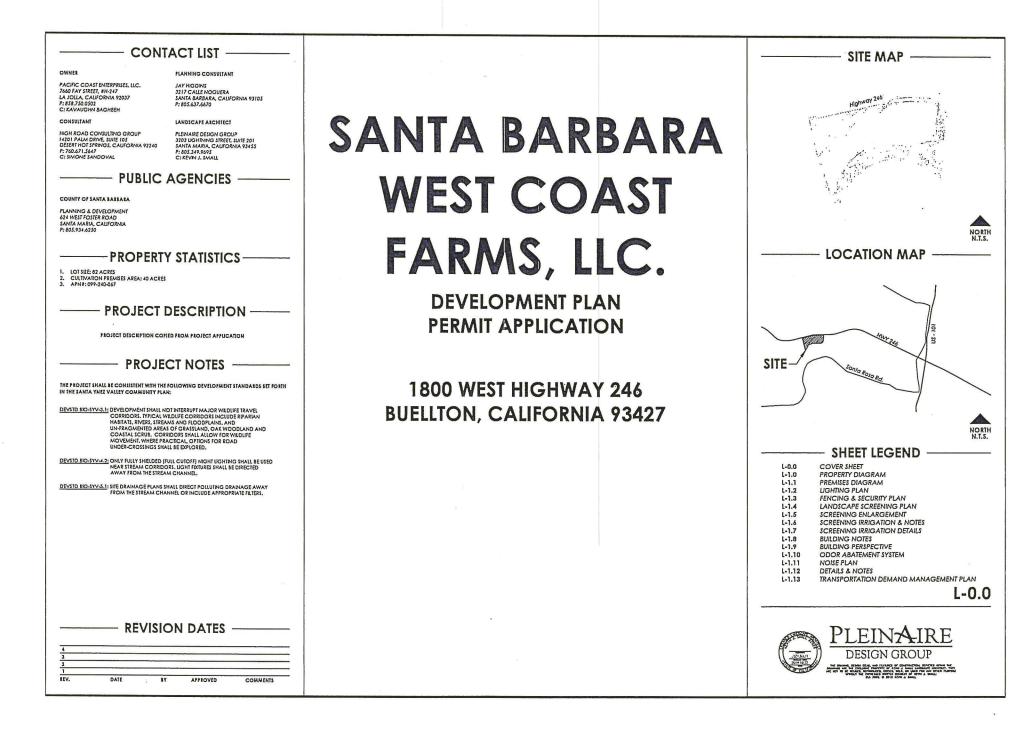
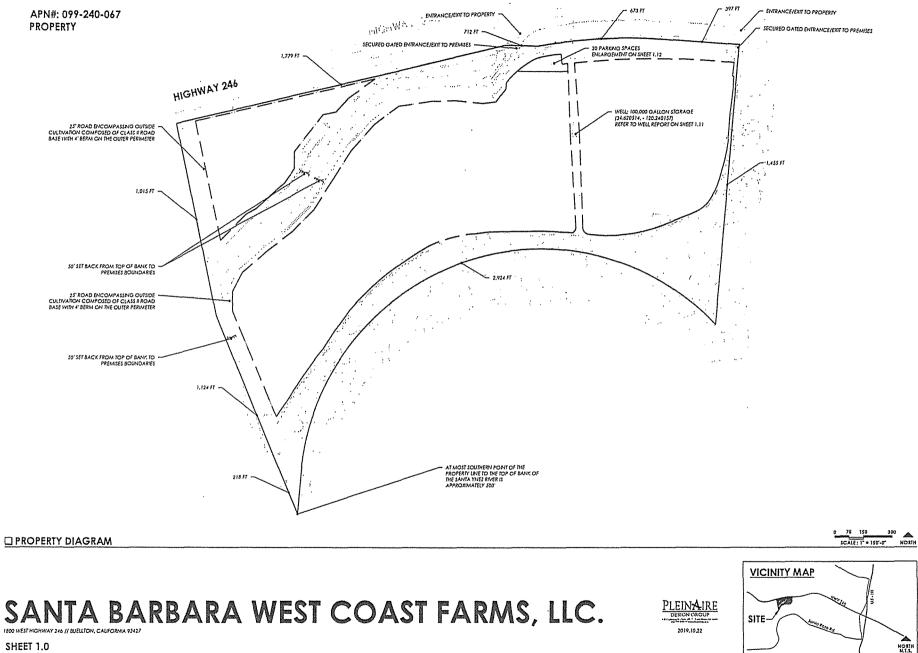
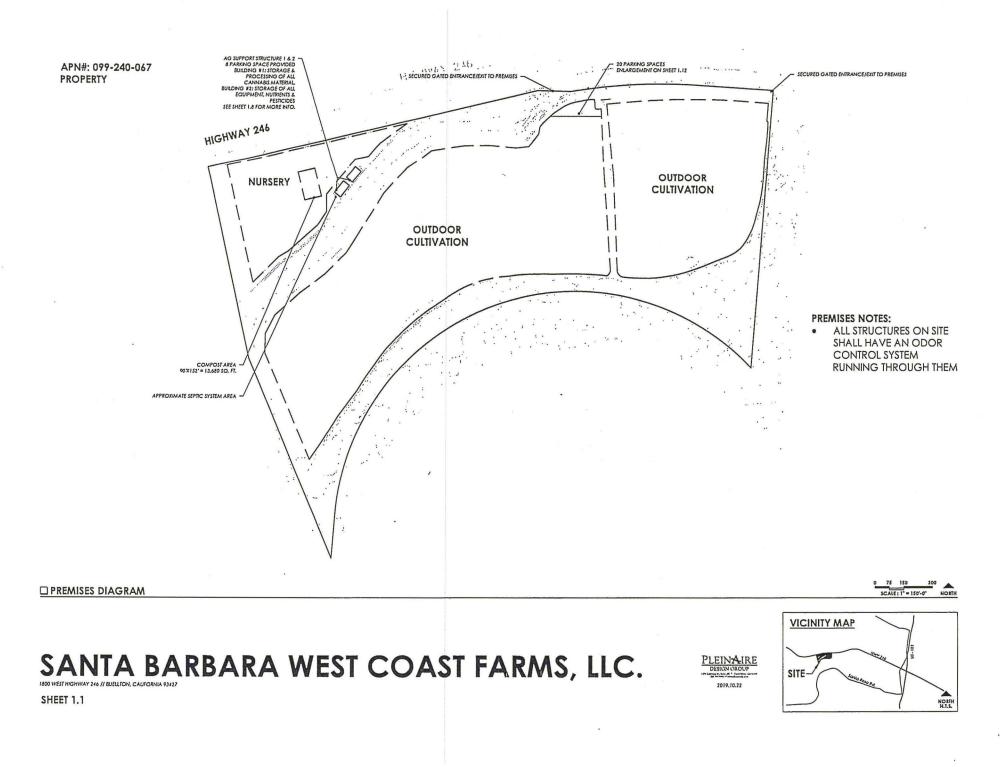
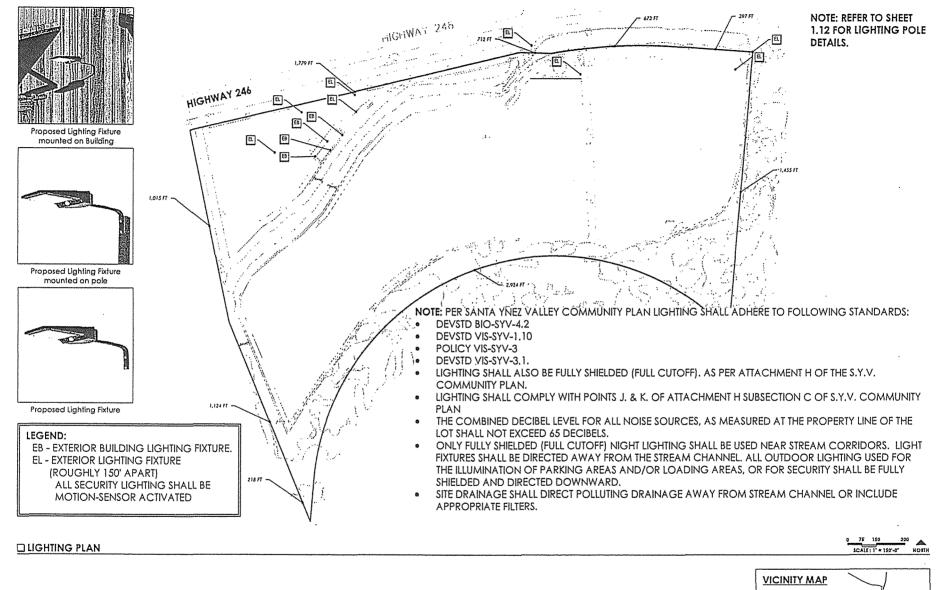


Exhibit B





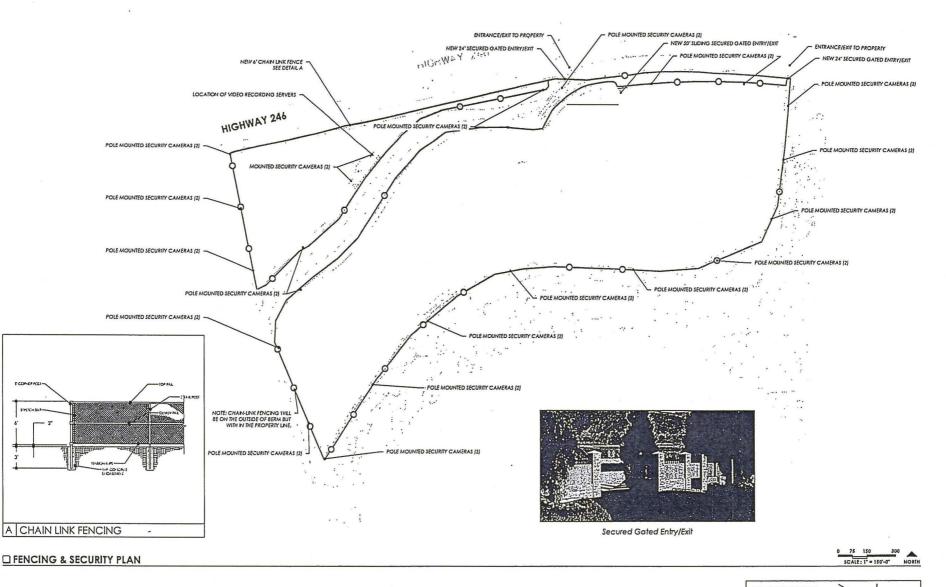




SANTA BARBARA WEST COAST FARMS, LLC.

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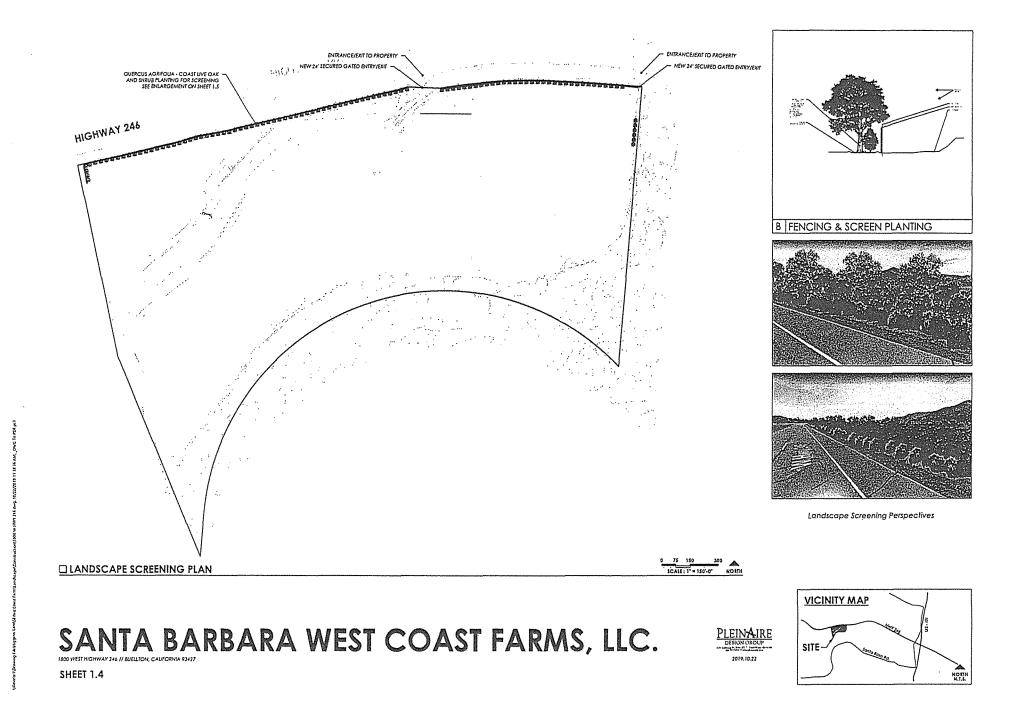
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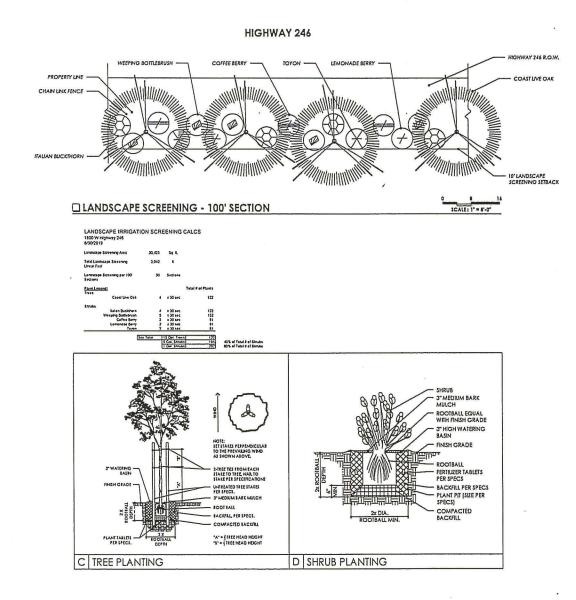


SANTA BARBARA WEST COAST FARMS, LLC.



NORTH N.T.S.





SCREENING ENLARGEMENT

SANTA BARBARA WEST COAST FARMS, LLC. 1500 WEST HIGHWAY 246 // BUELLTON, CALIFORNIA 9342

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GENERAL PLANTING NOTES

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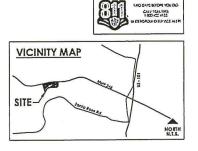
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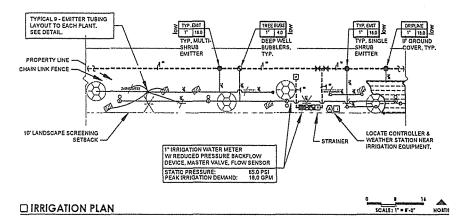
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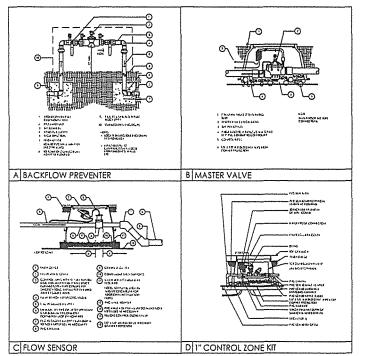
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- 10 11. ALL FLOW LINES ESTABLISHED BY GRADING PLAN SHALL BE MAINTAINED BY FINSH GRADING. MAINTAIN 1.5% MINIMUM FLOW IN ALL PLANTER AREAS.







□ SCREENING IRRIGATION & NOTES

SANTA BARBARA WEST COAST FARMS, LLC. 1800 WEST HIGHWAY 246 // BUELLTON, CAUFORNIA 93422

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	1040	# 7.40-500-34	AIR RELEASE VALVE						
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MWELO IRRIGATION NOTES

DESIGN & INSTALLATION REQUIREMENTS FOR THE MODEL WATER EFFICIENT LANDSCAPE ORDINANCE (MWELO) EFFECTIVE DECEMBER 1, 2015

- DESIGN AND INSTALLATION SHALL INCLUDE THE FOLLOWING:
- 1. AUTOMATIC IRRIGATION CONTROLLER USING ET OR SOIL MOISTURE SENSOR DATA AREA REQUIRED.
- SENSOR DATA AREA REQUIRED. 1.1, LANDSCAPE WATER METERS (DEDICATED OR PRIVATE) SHALL BE INSTALLED FOR ALL NON-RESIDENTIAL LANDSCAPE OF 1,000 SQUARE FEET BUT NOT MORE THAN 5,000 SQUARE FEET OR 0000-000
- RUDARE PEEL BUT NOT MURE TAAM SUD BUDARE PEEL DR 1.2. RESIDENTAL OVER SJOD BUDARE PEEL 2. RAIN, FREEZE AND WIND SENSORS ARE REQUIRED, AS NEEDED FOR LOCAL CLIMATE. 5. FLOW SENSORS THAT DETECT HIGH FLOW ARE REQUIRED FOR ALL
- NON-RESIDENTIAL LANDSCAPES AND RESIDENTIAL 5,000 SQUARE
- FEET. 4. PRESSURE REQULATING DEVICES ARE REQUIRED. LOW FLOW WILL
- NEED BOOSTER.
- NEED BOOSTER. 5. CHECK VALVE AND ANTI-DRAIN VALVES ARE REQUIRED WHERE LOW HEAD DRAINAGE COULD OCCUR. 5. NO OVERHEAD IRRIGATION WITHIN 24 INCHES OF ANY NON-PERMEABLE
- SURFACE.
- SURFACE. 7. LOW YOULWE (ORIP) IRRIGATION IS REQUIRED ON MULCHED PLANTING AREAS. 8. AREAS LEAS THAN 10 FEET IN WIDTN IN ANY DIRECTION MUST BE 1. RARGATED WITH SUBSURFACE IRRIGATION OR ANOTHER MEANS THAT ORDANICE WO DINUDES.

- IRRIGATED WITH SUBSURFACE IRRIGATION OR ANOTHER MEANS THAT PRODUCES NO RUNOFF. 9. ALL PRINKLER HEADS MUST DOCUMENT A LOWER QUARTER DISTRIBUTION UNIFORMITY (DULQ) OF 65% OR HIGHER. 10. EMISSION DEVICES MUST HAVE MATCHED PRECIPITATION RATES, 11. COL MANAGEMENT REPORT THAT INCLUDES SOL ANALYSIS: TEXTURE, INFILTRATION RATE, PH, SOLUBLE SALTS, SODIUM, & ORGANIC, RECOMMENDATIONS,

SOIL PREPARATION:

- SUL PREFAMILIA: 1, PROR TO PLANTING COMPACTED SOIL SHALL BE TRANSFORMED TO A FRAUBLE CONDITION. 2, INSTALLING: COMPOSIT AT A MINIMUM RATE OF FOUR CUBIC YARDS PER 1,003 GUIARE FEET OF PERMEABLE AREA SHALL BE INCORFORMATED TO A DEPTH OF B INCIDES INTO SOIL.

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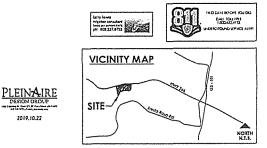


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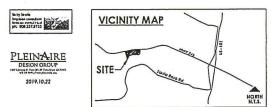
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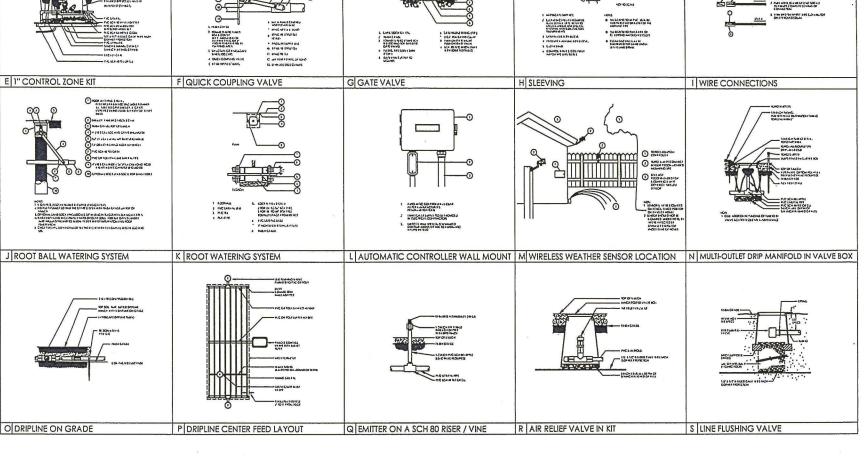
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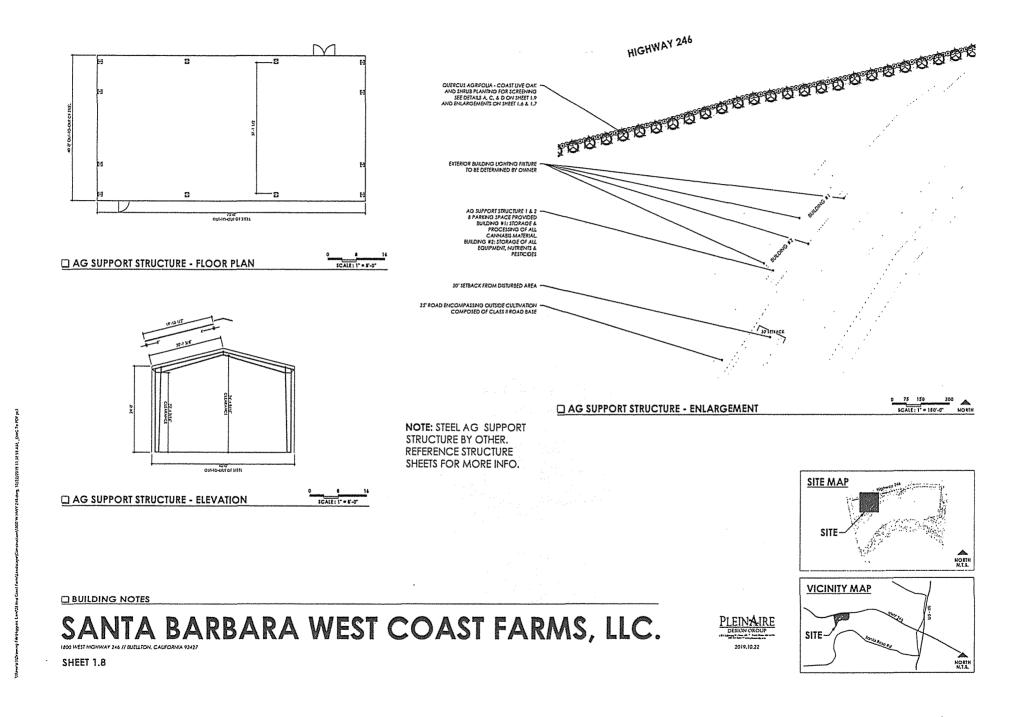
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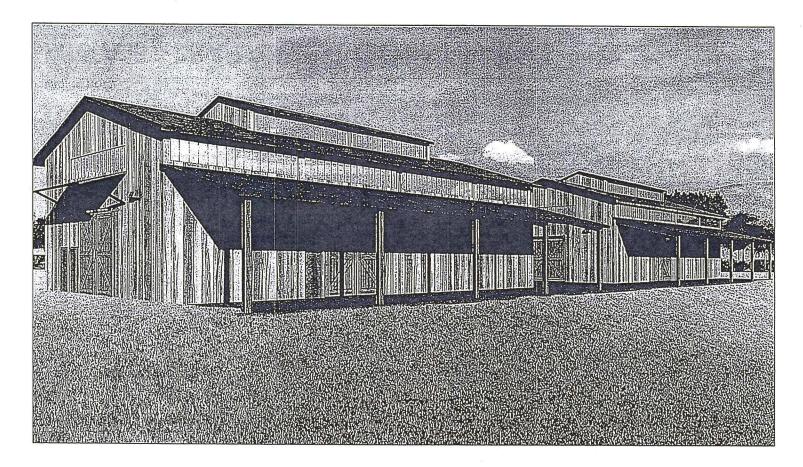
□ SCREENING IRRIGATION DETAILS

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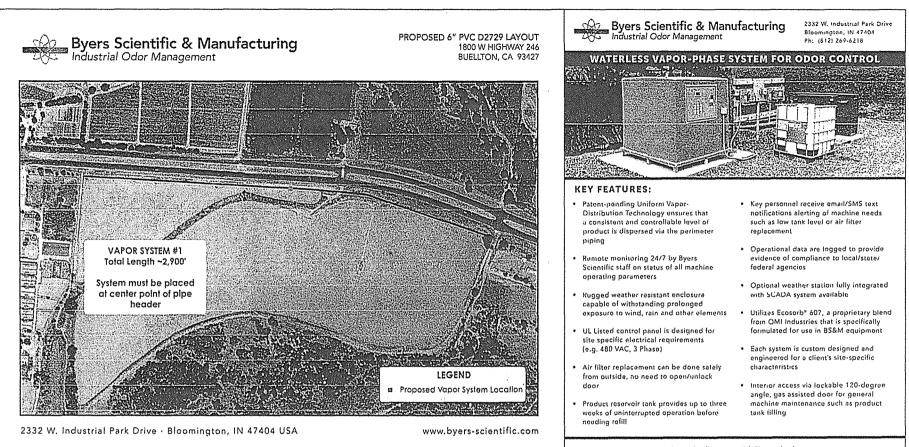
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PLEINAIRE DESIGN OROUP

2019,10.22

BUILDING PERSPECTIVE

SANTA BARBARA WEST COAST FARMS, LLC.



www.byars-scientific.com + infa@byars-tcientific.com

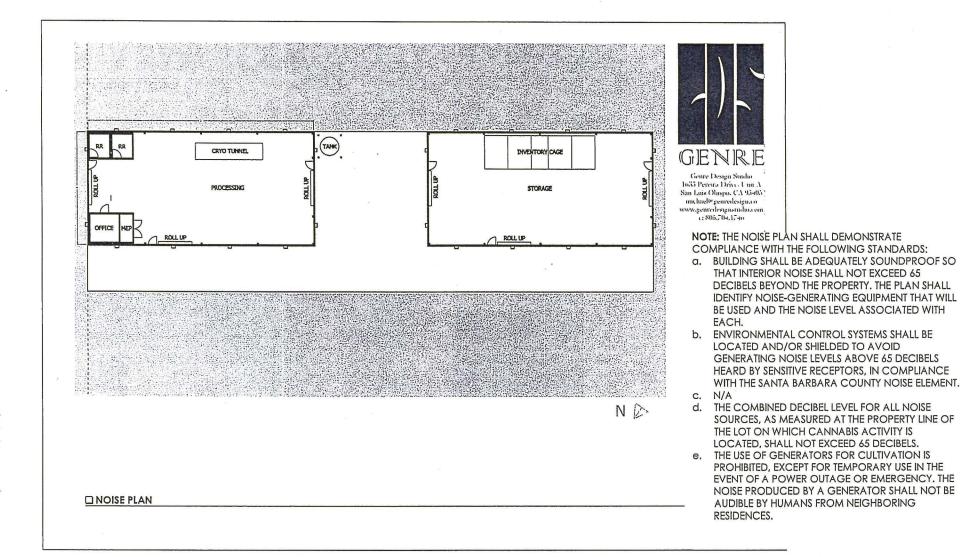
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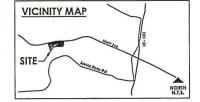
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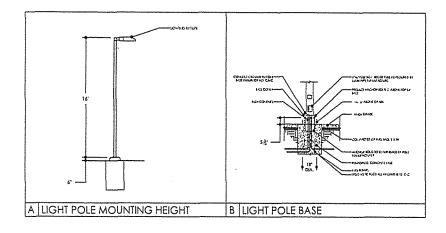
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WATER EFFICIENT LANDSCAPE WORKSHEET

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LANDSCAPE AREA CALCS, FOR WATER USE ESTIMATE 1800 W Highway 246 8/30/2019

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2,237,778	Sq. ft.	
281,269	Sq. A.	
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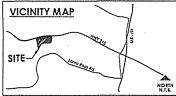
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DETAILS & NOTES

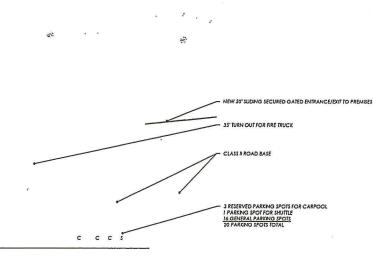
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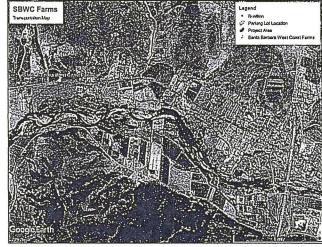
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TRANSPORTATION ROUTE MAP

TRANSPORTATION ROUTE NOTES:

ALL TRAFFIC LEAVES AND ARRIVES VIA A DRIVEWAY CONNECTED DIRECTLY TO CA-246

PARKING LOT ENLARGEMENT

0 10 20 40 SCALE: 1" = 20'-0" NORTH

TRANSPORTATION ROUTE NOTES:

ALL TRAFFIC LEAVES AND ARRIVES VIA A DRIVEWAY CONNECTED DIRECTLY TO CA-246

GENERAL NOTES: 1. LOT LOCATION

- TWO PARKING AREAS ON SITE CONSTRUCTED WITH CLASS II ROAD BASE 1.1.
- ONE MAIN PARKING LOT WITH 20 PARKING SPOTS, 3 RESERVED FOR CARPOOL, ONE FOR SHUTTLE PARKING 1.2.
- ONE ADDITIONAL PARKING AREA NEAR ACCESSORY STRUCTURES WITH 8 PARKING SPOTS 1.3.

2. TOTAL NUMBER OF EMPLOYEES

- 2.1. 10 FULL TIME CULTIVATION STAFF ON SITE DURING CULTIVATION SEASON
- ADDITIONAL 10-20 TEMP LABORERS BROUGHT IN FOR TRANSPLANTING, HARVESTING, & PROCESSING ACTIVITIES 2.2.

3. HOURS OF OPERATION

3.1. 6:00 AM - 3:00 PM DAILY

4. TRIP ORIGINS & DESTINATIONS

- 4.1. LABOR COMES FROM SURROUNDING AREAS VIA CA-246
- HARVESTED CANNABIS PROCESSED ON-SITE THEN SENT TO CA TYPE-7 VOLATILE MANUFACTURING FACILITY IN SAN DIEGO VIA US-101 AND I-5 SOUTH. 4.2.

5. VEHICLE USAGE

5.1. DURING HARVEST SEASON, ONE VEHICLE PER DAY SHALL BE USED FOR TRANSPORTING CANNABIS

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5.2. VEHICLE SIZE RANGING FROM A SPRINTER TO FULL-SIZE TRUCK (40-FOOT CONEX)

TRANSPORTATION DEMAND MANAGEMENT PLAN

SANTA BARBARA WEST COAST FARMS, LLC. 1800 WEST HIGHWAY 246 // BUELLTON, CAUFORNIA 93427

SHEET 1.13



Santa Barbara West Coast Farms, LLC.

County of Santa Barbara Land Use Permit Operational Planning Information 1800 W Highway 246 Buellton, CA February 8, 2019

MISSION STATEMENT

Upgrade an existing farm to a best practices cannabis cultivation operation with 100% organic and sustainable practices in a way that is seamless and compatible with its community. Deploy emerging best management practices that improve soil conditions, reduce the need for fertilizers, address pest issues without sprays or traditional pesticides, and conserve water using drip irrigation.

Through compliance with state and local agencies regulations and a devotion to holistic framing processes, the applicant can build a local business that will contribute positively to the local economy while protecting area water and wildlife resources.

CULTIVATION PROCESS

Plants will be either started from seed each spring or created via cuttings from mother stock plants. The seedlings or clones will be transferred to 4" pots once rooted and allowed to establish a healthy root system before transplant into row crops in the end of spring (May-June). A cover crop is sowed into the soil in later winter/early spring of each year. The mixture of seeds grows over the spring to establish a healthy and biodynamic soil ecosystem prior to cannabis transplanting.

The applicant will be employing organic practices including the use of raw or slightly processed natural inputs. A mixture of amendments will be added before the start of the growing season based on the results of soil sample analysis and periodic top dressings will occur during the growing cycle when tissue sample analysis indicates deficiencies. Materials used include on-site cannabis compost, various meals (kelp, fish, feather, bone, etc.), ground oyster shells, earthworm castings, molasses and other natural sources of the basic building blocks of plant nutrition.

A thoroughly implemented Integrated Pest Management (IPM) program will be established prior to starting cultivation <u>and will follow</u> <u>CalCannabis guidelines</u>. The applicant will design the program to eliminate the need for sprays with the use of early proactive monitoring, indicator plants, cover co-crops, and predatory insects from a licensed insectary. The use of predator insects to eat cannabis pests is the closest analogy to the natural environment possible. Only through a successful organic IPM program can cultivation pesticides be dramatically reduced or eliminate entirely.

The growing cannabis plants are inspected daily for various issues and additional support added to prevent the budding limbs from breaking as needed. At the time of harvest, the entire plant is cut down and transported immediately to the drying facility. All cannabis waste material will be collected for mulching and composting, and non-cannabis waste will placed in a secure storage bin for transport off site.

WASTE AND DISCHARGE PROCEDURE OVERVIEW

This facility utilizes organic gardening processes which allow the cultivators to re-use soil, so there is minimal organic waste. Plant waste after each harvest consists of stems, root balls, and minimal THC bearing fan leaves. On-site composting will be the method of disposal as it generates fertilizer inputs while reducing landfill waste. Composted cannabis waste is used to reamend the growing soil medium every spring season.

All plant matter collected daily will be placed in alternating layers with a brown organic waste (i.e. tree leaves and chipped branches). The stacked layers will be built into a pile and allowed to slowly compost, with an occasional turning to encourage material breakdown and a complete composting. Several piles will be maintained and monitored daily. Leaching of nutrients or transport of materials is controlled with concrete compost stalls and covering of materials to protect from wind and rain.

FACILITY DISCHARGES

The applicant is committed to being water efficient. Reducing the need for irrigation through various cultural and biological techniques also correspondingly reduces the amount of possible wastewater. An emphasis will be placed on building a healthy living soil that mimics the natural environment where plants decay into organic matter.

To maintain a living soil, the microbes must be feed with raw organic inputs and proper moisture levels. The result is a natural plant fertilizer located in the root zone for easy plant uptake and the elimination of over reliance on mixed liquid fertilizers. Synthetic fertilizers or other products that kill microbes are always avoided.

Constant supervision of all irrigation is required for maximal plant growth. In-ground moisture sensors and cultivation staff will monitor for over-watering symptoms in the cultivation area daily, as well as inspect the water delivery systems for leaks. Irrigation will be controlled via automated fertigation systems, and nutrients will be mixed according to recipes developed and refined by cultivation nstaff. Watering events are timed to coincide with cooler temperature times of day to limit evaporative losses due to higher temperature or windy conditions.

The applicant will be enrolled in the State Waters Resources Control Board's (SWRCB) Cannabis Cultivation program that regulates all aspects of water diversion, water discharges, and environmental conditions on-site. Additionally, water and wildlife resources are also protected with compliance of Department of Fish and Wildlife (CDFW) regulations.

Enrollment with SWRCB and compliance with CDFW are both required for CDFA cannabis cultivation state licensing and help to provide for the most stringent environmental standards of an agricultural crop in California. There will be no toxic or hazardous discharges from the cultivation of this facility. The applicant is committed to best practices of organic and efficient approaches to reduce waste and pollution.

FENCING PLAN

Fencing will meet County standards for security and screening and those details are illustrated on the Site Plans associated with this permit application.

LANDSCAPE AND SCREENING PLAN

Landscape screening will meet the County standards and those details are illustrated on the Site Plans associated with this permit application.

LIGHTING PLAN

Exterior lighting will meet the County standards and those details are illustrated on the Site Plans associated with this permit application. Broken or damaged exterior lighting shall be repaired for replaced within 48 hours of being noted. Exterior lighting shall be shielded or otherwise designed to avoid spillover illumination to adjacent properties, and all security lighting will be equipped with motion sensors.

NOISE PLAN

Noise from this project will be minimal as there are no generators or other large machinery proposed. Any complaints from the above items can be referred to the emergency contact person for this project: Scott Rudolph 858-205-5899. The noise plan shall demonstrate compliance with the following standards:

a.Building shall be adequately soundproof so that interior noise shall not exceed 65 decibels beyond the property. The plan shall identify noise-generating equipment that will be used and the noise level associated with each.

b. Environmental control systems shall be located and/or shielded to avoid generating noise levels above 65 decibels heard by sensitive receptors, in compliance with the Santa Barbara county noise element.

c. N/A

d. The combined decibel level for all noise sources, as measured at the property line of the lot on which cannabis activity is located, shall not exceed 65 decibels.

e. The use of generators for cultivation is prohibited, except for temporary use in the event of a power outage or emergency. The noise produced by a generator shall not be audible by humans from neighboring residences.

ODOR ABATEMENT

Odor abatement will be installed on the eastern side of the property to take advantage of prevailing winds. Prevailing winds in Buellton are west-northwest (meaning the wind generally blows east-southeast.

While there are no residential zones within miles from the project site, there closest residence on a nearby agriculturally zoned parcel, to the east-southeast is approximately 400 feet away and also has pending applications for the cultivation of cannabis.

SIGNAGE

The applicant will not have any signage that identifies the property as being used for cannabis.

TREE AND HABITAT PROTECTION, WILDLIFE MOVEMENT PLAN

No new ground disturbance or removal of native vegetation is proposed and therefore tree protection or wildlife movement plans are not required. The crop area is a replacement to squash that has historically been cultivated on site.

COMPLIANCE WITH WATER EFFICIENCY STANDARDS

Water efficiency is of the utmost importance to the applicants. Aside from employing best practices of organic gardening which minimally impact the environment, the applicant will equip the entire facility with the following:

- Drip and Micro Irrigation
- · Float valves for all storage tanks with air gaps to prevent backflow
- Backflow preventers to block any possible contamination of water supply
- Rupture mitigation and safety redundancy plumbing designs

The property has one existing water well that is currently producing roughly 750 gallons per minute. The well casing has been drilled to a depth of 250 feet. Use of groundwater for irrigation eliminates the need to divert surface water, thereby allowing for other important water uses such as recreational and wildlife enhancement. Additionally, the use of groundwater is in full compliance with State Water Resources Control Board cannabis cultivation water forbearance requirements and is also supported by California Department of Fish and Wildlife regulations.

ENERGY CONSERVATION PLAN

Energy conservation plans will be submitted to the County as a part of the follow up business licensing procedures outlined in Chapter 50 of the County Ordinances. The applicant is a new operation and plans to purchase 100% energy offset credits from their utility provider.

FACILITY SECURITY

Access to the facility is limited to employees or contractors. Full-time bonded Security will be utilized during harvest periods. Physical fencing will be located around the perimeter of the project, with two access points controlled via RFID access key or via armed guard. An alarm system will be installed on the property with central monitoring capabilities. Video camera systems will involve cameras of a minimum 2048x1536 pixels, transmitting via TCP over the local network, at a minimum framerate of 30 frames per second. Cameras will be located within 20 feet of all points of entry or exit from the facility and will be stationed to capture faces and license plates of all persons and vehicles entering and exiting the property. Security cameras will also capture video of anywhere cannabis is grown, stored, processed, weighed, or sold.

Location and Building Specifications

There is only one entrance onto the property. This entrance is always gated and locked, access to the facility is controlled via RFID keypad or stationed security guard.

Video Assessment and Surveillance System (VASS)

This facility will be equipped with a video surveillance system. Cameras are recorded 24 hours per day at a minimum of 2MP (2048x1536) resolution and 30 frames per second, which is more than sufficient to capture fine details such as faces and license plates.

Camera recordings will be maintained at all state and county standards. Camera recordings are kept on-site in a secured area only accessible to management. Video details for security will be submitted to the County Executive Office ahead of the business license

Hours of Operation:

This facility is open internally from 6:00 AM - 3:00 PM, five days a week.

Onsite Consumption Policy:

No person shall be allowed to smoke, ingest, or otherwise consume cannabis in any form within the site.

Secure Storage Area:

This facility has a locked storage room and is only accessible by a manager. Entrances to the secure storage area are monitored via cameras.

Loading Procedures:

When a transport vehicle arrives at the facility, it will enter through the gate and proceed to the loading area on the west side of the storage barn. Manager will verify that there is no unauthorized person in the parking area prior to opening the door to the loading area.

Finished product for transport will remain in the locked storage area until transport vehicle is pulled up to door and the area is secure. Once the transport vehicle is loaded, manager will verify that the parking lot is clear before the vehicle exits the loading area.

Delivery Procedures:

Delivery vehicles will not have any identification or markings related to cannabis or a distribution company or collective. Each vehicle will have a lockable trunk or area in the back that is not viewable from any windows. Product for delivery will remain in a locked safe room until ready for transport.

Each delivery driver will carry a valid driver's license, an employer issued badge, vehicle registration, proof of required insurance, and the delivery manifest.

Security Staff Procedures & Policies, Employment Eligibility:

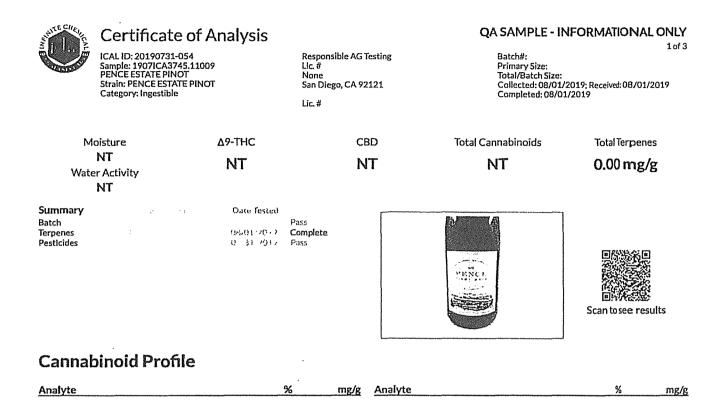
Security staff will be hired through a bonded and insured security company.

Inventory and Record Keeping:

Upon processing of cannabis plants, a single and unique identifying number shall be issued for finished product. All harvested plants will be documented and processed into final deliverable via the track and trace system, and include strain type, weight and storage location as required by the County of Santa Barbara.

END

Exhibit C



Total THC=THCa * 0.877 + d9-THC; Total CBD = CBDa * 0.877 + CBD; NR= Not Reported, ND= Not Detected, 'Reported by Dry Mass'; 'analytical instrumentation used Cannabinoids: UHPLC-DAD, Moisture: Mass by Drying; Water Activity; Water Activity; Meter, Foreign Material: Microscope*

Terpene Profile

Analyte	%	mg/g	Analyte	%	mg/g
α-Bisabolol	ND	ND	δ-Limonene	ND	ND
α-Humulene	ND	ND	Eucalyptol	ND	ND
a-Pinene	ND	ND	y-Terpinene	ND	ND
a-Terpinene	ND	ND	Geraniol	ND	ND
β-Caryophyllene	ND	ND	Linalool	ND	ND
β-Myrcene	ND	ND	Ocimene	ND	ND
β-Ocimene	ND	ND	(-)-Guaiol	ND	ND
β-Pinene	ND	ND	{-}-Isopulegol	ND	ND
Camphene	ND	ND	p-Cymene	ND	ND
Caryophyllene Oxide	ND	ND	Terpinolene	ND	ND
cis-Nerolidol	ND	ND	trans-Nerolidol	ND	ND
δ-3-Carene	ND	ND	Total	0	0

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantlfication (LOQ), 'analytical instrumentation used:HS-GC-FID-FID'



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Josh M Surder

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Josh Swider Lab Director, Managing Partner 08/01/2019



ICAL ID: 20190731-054 Sample: 1907ICA3745.11009 PENCE ESTATE PINOT Strain: PENCE ESTATE PINOT Category: Ingestible Responsible AG Testing Lic. # None San Diego, CA 92121 Lic. #

QA SAMPLE - INFORMATIONAL ONLY

2 of 3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Residual Solvent Analysis

Category 1	. Status	Category 2	Status	Category 2	Status

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ) ; analytical instrumentation used=HS-GG-FID-FID*

Heavy Metal Screening

Status

NR=: Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), *analytical instrumentation used: ICP-M5*

Microbiological Screening

Result

Status

ND=Not Detected; "analytical instrumentation used:qPCR"

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ICAL ID: 20190731-054 Sample: 1907ICA3745.11009 PENCE ESTATE PINOT Strain: PENCE ESTATE PINOT Category: Ingestible Responsible AG Testing Lic. # None San Diego, CA 92121 Lic. #

QA SAMPLE - INFORMATIONAL ONLY

3 of 3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Chemical Residue Screening

Category 1		Status	Mycotoxins		Status
A 1 31 1	hã/g	Deer			
Aldicarb	ND	Pass			
Carbofuran	ND	Pass			
Chlordane	ND	Pass			
Chlorfenapyr	ND	Pass Pass			
Chlorpyrifos	ND				
Coumaphos	ND	Pass			
Daminozide	ND	Pass			
DDVP	ND	Pass			
Dimethoate	ND	Pass			
Ethoprophos	ND	Pass			
Etofenprox	ND	Pass			
Fenoxycarb	ND	Pass			
Fipronil	ND	Pass			
Imazalil	ND	Pass			
Methiocarb	ND	Pass			
Methyl Parathion	ND	Pass			
Mevinphos	ND	Pass			
Paclobutrazol	ND	Pass			
Propoxur	ND	Pass			
Spiroxamine	ND	Pass			
Thiacloprid	ND	Pass			
Category 2		Status	Category 2		Status
Categoryz	wala	518105	<u>Category</u> 2	110/0	JIANA
Abamectin	ha/a ND	Pass	Kresoxim Methyl	hb/g ND	Pass
Acephate	ND	Pass	Malathion	ND	Pass
Acequinocyl	ND	Pass	Metalaxyl	ND	Pass
Acetamiprid	ND	Pass	Methomyl	ND	Pass
	ND	Pass	Myclobutanil	ND	Pass
Azoxystrobin Bifenazate	ND	Pass	Naled	ND	Pass
	ND	Pass	Oxamyl	ND	Pass
Bifenthrin			Pentachloronitrobenzene	ND	
Boscalid	0.068 ND	Pass Pass	Permethrin	ND	Pass
Captan			Phosmet	ND	Pass
Carbaryl	ND	Pass			. Pass
Chlorantraniliprole	ND	Pass	Piperonyl Butoxide	ND	Pass
Clofentezine	ND	Pass	Prallethrin	ND	Pass
Cyfluthrin	ND	Pass	Propiconazole	ND	Pass
Cypermethrin	ND	Pass	Pyrethrins	ND	Pass
Diazinon	ND	Pass	Pyridaben	ND	Pass
Dimethomorph	ND	Pass	Spinetoram	ND	Pass
Etoxazole	ND	Pass	Spinosad	ND	Pass
Fenhexamid	ND	Pass	Spiromesifen	ND	Pass
Fenpyroximate	ND	Pass	Spirotetramat	ND	Pass
Flonicamid	ND	Pass	Tebuconazole	ND	Pass
Fludioxonil	ND	Pass	Thiamethoxam	ND	Pass
Hexythiazox	ND	Pass	Trifloxystrobin	ND	Pass
Imidacloprid	ND	Pass			

Unknown Analyte(s):

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), *analytical instrumentation used: LC-MSMS & GC-MSMS*



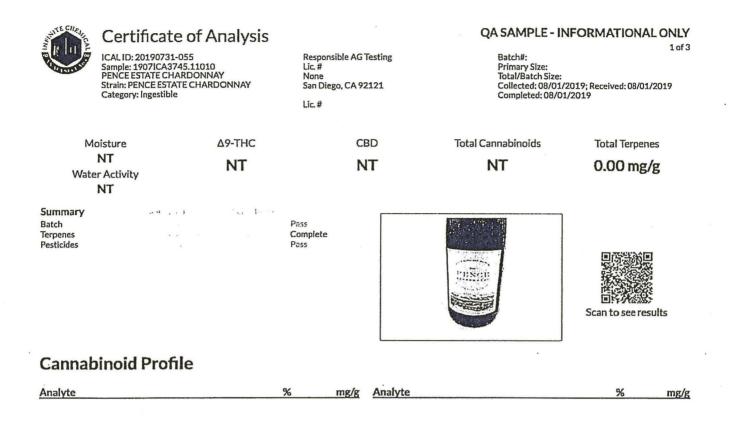
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Josh Swider Lab Director, Managing Partner 08/01/2019



Total THC=THCa * 0.877 + d9-THC; Total CBD = CBDa * 0.877 + CBD; NR= Not Reported, ND= Not Detected, *Reported by Dry Mass*; *analytical instrumentation used Cannabinoids: UHPLC-DAD, Moisture: Mass by Drying; Water Activity; Water Activity; Meter, Foreign Material: Microscope*

Terpene Profile

Analyte	%	mg/g	Analyte	%	mg/g
α-Bisabolol	ND	ND	δ-Limonene	ND	ND
α-Humulene	ND	ND	Eucalyptol	ND	ND
α-Pinene	ND	ND	y-Terpinene	ND	ND
α-Terpinene	ND	ND	Geranio	ND	ND
β-Caryophyllene	ND	ND	Linalool	ND	ND
β-Myrcene	ND	ND	Ocimene	ND	ND
β-Ocimene	ND	ND	(-)-Guaiol	ND	ND
β-Pinene	ND	ND	(-)-Isopulegol	ND	ND
Camphene	ND	ND	p-Cymene	ND	ND
Caryophyllene Oxide	ND	ND	Terpinolene	ND	ND
cis-Nerolidol	ND	ND	trans-Nerolidol	ND	ND
δ-3-Carene	ND	ND	Total	0	0

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), "analytical instrumentation used:HS-GC-FID-FID"



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Josh Swider Lab Director, Managing Partner 08/01/2019



ICAL ID: 20190731-055 Sample: 1907ICA3745.11010 PENCE ESTATE CHARDONNAY Strain: PENCE ESTATE CHARDONNAY Category: Ingestible Responsible AG Testing Lic. # None San Diego, CA 92121 Lic. #

QA SAMPLE - INFORMATIONAL ONLY 20f3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Residual Solvent Analysis

Category 1 St	atus	Category 2 Status	Category 2
			encegoi / z

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), analytical instrumentation used=HS-GGFID-FID*

Heavy Metal Screening

Status

Status

Status

NR= Not Reported thus no analysis was performed, ND= Not Delected thus the concentration is less then the Limit of Quantification (LOQ), analytical instrumentation used: ICP-MS*

Microbiological Screening

Result

ND=Not Detected; *analytical instrumentation used:qPCR*



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ICAL ID: 20190731-055 Sample: 1907/CA3745.11010 PENCE ESTATE CHARDONNAY Strain: PENCE ESTATE CHARDONNAY Category: Ingestible

Responsible AG Testing
Lic.#
None
San Diego, CA 92121
Lic #

QA SAMPLE - INFORMATIONAL ONLY

3 of 3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Chemical Residue Screening

Category 1		Status	Mycotoxins		Status
	h8/8				
Aldicarb	ND	Pass			
Carbofuran	ND	Pass			
Chlordane	ND	Pass			
Chlorfenapyr	ND	Pass			
Chlorpyrifos	ND	Pass			
Coumaphos	ND	Pass			
Daminozide	ND	Pass			
DDVP	ND	Pass			
Dimethoate	ND	Pass			
Ethoprophos	ND	Pass			
Etofenprox	ND	Pass			
Fenoxycarb	ND	Pass			
Fipronil	ND	Pass			
Imazalil	ND	Pass			
Methiocarb	ND	Pass			
Methyl Parathion	ND .	Pass			
Mevinphos	ND	Pass			
Paclobutrazol	ND	Pass			
Propoxur	ND	Pass			
Spiroxamine	ND	Pass			
Thiacloprid	ND	Pass			
Category 2		Status	Category 2		Status
Category 2	hg/g			µg/g	otatus
Abamectin	ND	Pass	Kresoxim Methyl	ND	Pass
Acephate	ND	Pass	Malathion	ND	Pass
Acequinocyl	ND	Pass	Metalaxyl	ND	Pass
Acetamiprid	ND	Pass	Methomyl	ND	Pass
Azoxystrobin	ND	Pass	Myclobutanil	ND	Pass
Bifenazate	ND	Pass	Naled	ND	Pass
Bifenthrin	ND	Pass	Oxamyl	ND	Pass
Boscalid	0.167	Pass	Pentachloronitrobenzene	ND	Pass
Captan	ND	Pass	Permethrin	ND	Pass
Carbaryl	ND	Pass	Phosmet	ND	Pass
Chlorantraniliprole	ND	Pass	Piperonyl Butoxide	ND	Pass
Clofentezine	ND	Pass	Prallethrin	ND	Pass
Cyfluthrin	ND	Pass	Propiconazole	ND	Pass
Cypermethrin	ND	Pass	Pyrethrins	ND	Pass
Diazinon	ND	Pass	Pyridaben	ND	Pass
Dimethomorph	ND	Pass	Spinetoram	ND	Pass
Etoxazole	ND	Pass	Spinosad	ND	Pass
Fenhexamid	ND	Pass	Spiromesifen	ND	Pass
Fenpyroximate	ND	Pass	Spirotetramat	ND	Pass
Flonicamid	ND	Pass	Tebuconazole	ND	Pass
Fludioxonil	ND	Pass	Thiamethoxam	ND	Pass
Hexythiazox	ND	Pass	Trifloxystrobin	ND	Pass
Imidacloprid	ND	Pass	11110/190 0011		F.d35
inidacioprid	110	1 033			

Unknown Analyte(s):

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), "analytical instrumentation used: LC-MSMS & GC-MSMS"



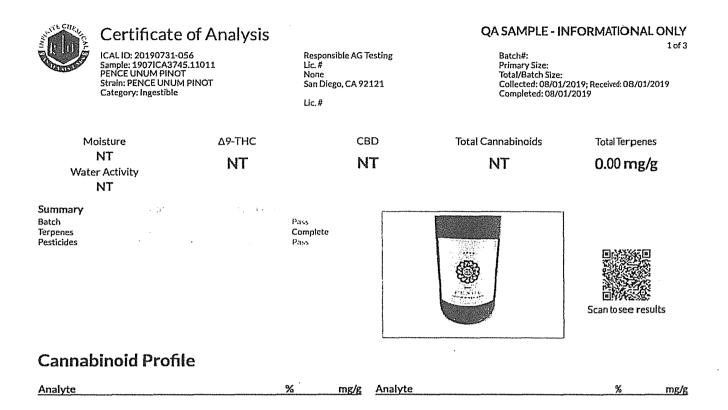
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Total THC=THCa * 0.877 + d9-THC; Total CBD = CBDa * 0.877 + CBD; NR= Not Reported, ND= Not Detected, *Reported by Dry Mass*; *analytical instrumentation used Cannabinoids: UHPLC-DAD, Moisture: Mass by Drying, Water Activity: Water, Foreign Material: Microscope*

Terpene Profile

Analyte	%	mg/g	Analyte	%	mg/g
α-Bisabolol	ND	ND	δ-Limonene	ND	ND
a-Humulene	ND	ND	Eucalyptol	ND	ND
α-Pinene	ND	ND	y-Terpinene	ND	ND
a-Terpinene	ND	ND	Geraniol	ND	ND
β-Caryophyllene	ND	ND	Linalool	ND	ND
β-Myrcene	ND	ND	Ocimene	ND	ND
β-Ocimene	ND	ND	(-)-Guaiol	ND	ND
β-Pinene	ND	ND	(-)-Isopulegol	ND	ND
Camphene	ND	ND	p-Cymene	ND	ND
Caryophyllene Oxide	ND	ND	Terpinolene	ND	ND
cis-Nerolidol	ND	ND	trans-Nerolidol	ND	ND
δ-3-Carene	ND	ND	Total	0	0

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), "analytical instrumentation used:HS-GC-FID-FID"



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08/01/2019

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ICAL ID: 20190731-056 Sample: 1907ICA3745.11011 PENCE UNUM PINOT Strain: PENCE UNUM PINOT Category: Ingestible Responsible AG Testing Lic, # None San Diego, CA 92121 Lic, #

QA SAMPLE - INFORMATIONAL ONLY

2 of 3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Residual Solvent Analysis

Category 1	Status	Category 2	Status	Category 2	Status

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), analytical instrumentation used=HS-GC-FID-FID*

Heavy Metal Screening

Status

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), analytical instrumentation used: ICP-MS*

Microbiological Screening

Result

Status

ND=Not Detected; *analytical instrumentation used:qPCR*

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ICAL ID: 20190731-056 Sample: 1907ICA3745.11011 PENCE UNUM PINOT Strain: PENCE UNUM PINOT Category: Ingestible

Responsible AG Testing Lic. # None San Diego, CA 92121 Lic. #

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3 of 3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Chemical Residue Screening

Category 1		Status	Mycotoxins		Status
	h8/8				
Aldicarb	ND	Pass			
Carbofuran	ND	Pass			
Chlordane	ND	Pass			
Chlorfenapyr	ND	Pass			
Chlorpyrifos	ND	Pass			
Coumaphos	ND	Pass			
Daminozide	ND	Pass			
DDVP	ND	Pass			
Dimethoate	ND	Pass			
Ethoprophos	ND	Pass			
Etofenprox	ND	Pass			
Fenoxycarb	ND	Pass			
Fipronil	ND	Pass			
Imazalil	ND	Pass			
Methiocarb	ND	Pass			
Methyl Parathion	ND	Pass	•		
Mevinphos	ND	Pass			
Paclobutrazol	ND	Pass			
Propoxur	ND	Pass			
Spiroxamine	ND	Pass			
Thiacloprid	ND	Pass			
Пасторна	1415	Pd55			
Category 2		Status	Category 2		Status
	μg/g			µg/g	
Abamectin	ND	Pass	Kresoxim Methyl	ND	Pass
Acephate	ND	Pass	Malathion	ND	Pass
Acequinocyl	ND	Pass	Metalaxyl	ND	Pass
Acetamiprid	ND	Pass	Methomyl	ND	Pass
Azoxystrobin	ND	Pass	Myclobutanil	ND	Pass
Bifenazate	ND	Pass	Naled	ND	Pass
Bifenthrin	ND	Pass	Oxamyl	ND	Pass
Boscalid	0.073	Pass	Pentachloronitrobenzene	ND	Pass
Captan	ND	Pass	Permethrin	ND	Pass
Carbaryl	ND	Pass	Phosmet	ND	Pass
Chlorantraniliprole	ND	Pass	Piperonyl Butoxide	ND	Pass
Clofentezine	ND	Pass	Prallethrin	ND	Pass
Cyfluthrin	ND	Pass	Propiconazole	ND	Pass
Cypermethrin	ND	Pass	Pyrethrins	ND	Pass
Diazinon	ND	Pass	Pyridaben	ND	Pass
Dimethomorph	ND	Pass	Spinetoram	ND	Pass
Etoxazole	ND	Pass	Spinosad	ND	Pass
Fenhexamid	ND	Pass	Spiromesifen	ND	Pass
Fenpyroximate	ND	Pass	Spirotetramat	ND	Pass
Flonicamid	ND	Pass	Tebuconazole	ND	
	ND		Thiamethoxam		Pass
Fludioxonil		Pass		ND	Pass
Hexythiazox	ND	Pass	Trifloxystrobin	ND	Pass
Imidacloprid	ND	Pass			

Unknown Analyte(s):

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), *analytical instrumentation used:LC-MSMS & GC-MSMS*



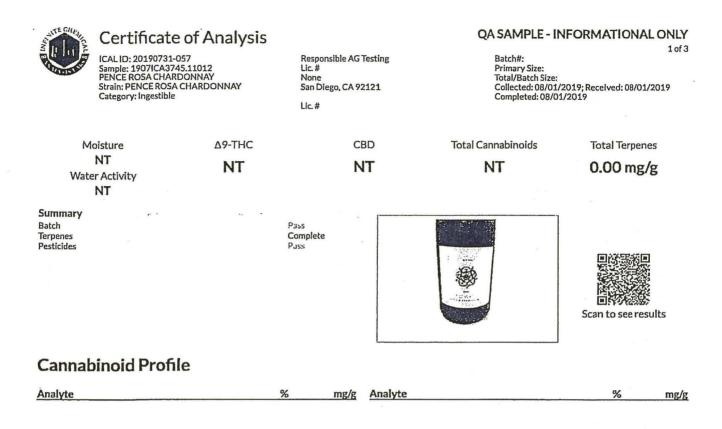
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Total THC=THCa ~ 0.877 + d9-THC; Total CBD = CBDa * 0.877 + CBD; NR= Not Reported, ND= Not Detected, *Reported by Dry Mass*; *analytical instrumentation used Cannabinoids: UHPLC-DAD, Moisture: Mass by Drying. Water Activity: Water Activity Meter, Foreign Material: Microscope*

Terpene Profile

Analyte	%	mg/g	Analyte	%	mg/g
α-Bisabolol	ND	ND	δ-Limonene	ND	ND
α-Humulene	ND	ND	Eucalyptol	ND	ND
α-Pinene	ND	ND	y-Terpinene	ND	ND
a-Terpinene	ND	ND	Geraniol	ND	ND
β-Caryophyllene	ND	ND	Linalool	ND	ND
β-Myrcene	ND	ND	Ocimene	ND	ND
β-Ocimene	ND	ND	(-)-Guaiol	ND	ND
β-Pinene	ND	ND	(-)-Isopulegol	ND	ND
Camphene	ND	ND	p-Cymene	ND	ND
Caryophyllene Oxide	ND	ND	Terpinolene	ND	ND
cis-Nerolidol	ND	ND	trans-Nerolidol	ND	ND
δ-3-Carene	ND	ND	Total	0	0

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), 'analytical instrumentation used:HS-GC-FID-FID'

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ICAL ID: 20190731-057 Sample: 1907ICA3745.11012 PENCE ROSA CHARDONNAY Strain: PENCE ROSA CHARDONNAY Category: Ingestible Responsible AG Testing Lic. # None San Diego, CA 92121 Lic. #

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2 of 3

Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Residual Solvent Analysis

Category 1 Status	Category 2 Status	Category 2 Status

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ) .analytical instrumentation used=HS-GG-FID-FID*

Heavy Metal Screening

Status

NR~ Not Reported thus no analysis was performed, ND~ Not Detected thus the concentration is less then the Limit of Quantification (LOQ), *analytical instrumentationused:ICP-M5*

Microbiological Screening

Result

Status

ND=Not Detected; "analytical instrumentation used: gPCR*

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ICAL ID: 20190731-057 Sample: 1907ICA3745.11012 PENCE ROSA CHARDONNAY Strain: PENCE ROSA CHARDONNAY Category: Ingestible Responsible AG Testing Lic. # None San Diego, CA 92121 Lic. #

QA SAMPLE - INFORMATIONAL ONLY

3 of 3

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Batch#: Primary Size: Total/Batch Size: Collected: 08/01/2019; Received: 08/01/2019 Completed: 08/01/2019

Chemical Residue Screening

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Unknown Analyte(s):

NR= Not Reported thus no analysis was performed, ND= Not Detected thus the concentration is less then the Limit of Quantification (LOQ), *analytical Instrumentation used: LC-MSMS & GC-MSMS*



Infinite Chemical Analysis Labs 8380 Miramar Mall #102 San Diego, CA (858) 623-2740 www.infiniteCAL.com Lic# C8-0000019-LIC ,

Surder

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