



County of Santa Cruz
 Cannabis Licensing Office
 701 Ocean Street, Room 520
 Santa Cruz, CA 95060
 831-454-3833
 Cannabisinfo@santacruzcounty.us



303-20

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

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

Application Number: License NR-C/M/D-0039
 Assessor Parcel Number: 030-111-48
 Project Location: 2720 S. Rodeo Gulch Rd. Soquel CA (see attached map)

Project Description: Cannabis cultivation, manufacture, distribution indoors in an existing commercial/industrial building (see attached "Project Description Preparation Form_Brodeco Inc.")

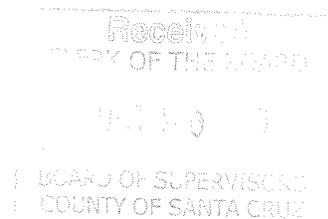
Person or Agency Proposing Project: 3Bros Brodeco Inc. (Tyler Smith)

Contact Phone Number: 831-588-0852

- A. The proposed activity is not a project under CEQA Guidelines Section 15378.
- B. The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).
- C. **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.
- D. **Statutory Exemption** other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).
- E. **Categorical Exemption**

Specify type: Class 1: Use of existing facilities

THIS NOTICE HAS BEEN POSTED AT THE CLERK
 OF THE BOARD OF SUPERVISORS OFFICE FOR A
 PERIOD COMMENCING 10/20/2020
 AND ENDING 11/19/2020





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Class	Category	Description
Class 1	Existing Facilities	Consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. (Cal. Code Regs., tit. 14, §15301.)

F. Reasons why the project is exempt:

Non-retail commercial cannabis uses (cultivation, manufacture, distribution) within an existing industrial/commercial building.

In addition, none of the conditions described in Section 15300.2 apply to this project.

Sam LoForti, Cannabis Licensing Manager

Date: 10/20/20

ATTACHMENTS: CDFW location map, Premise & Security Diagram (3 pgs.), project description preparation form

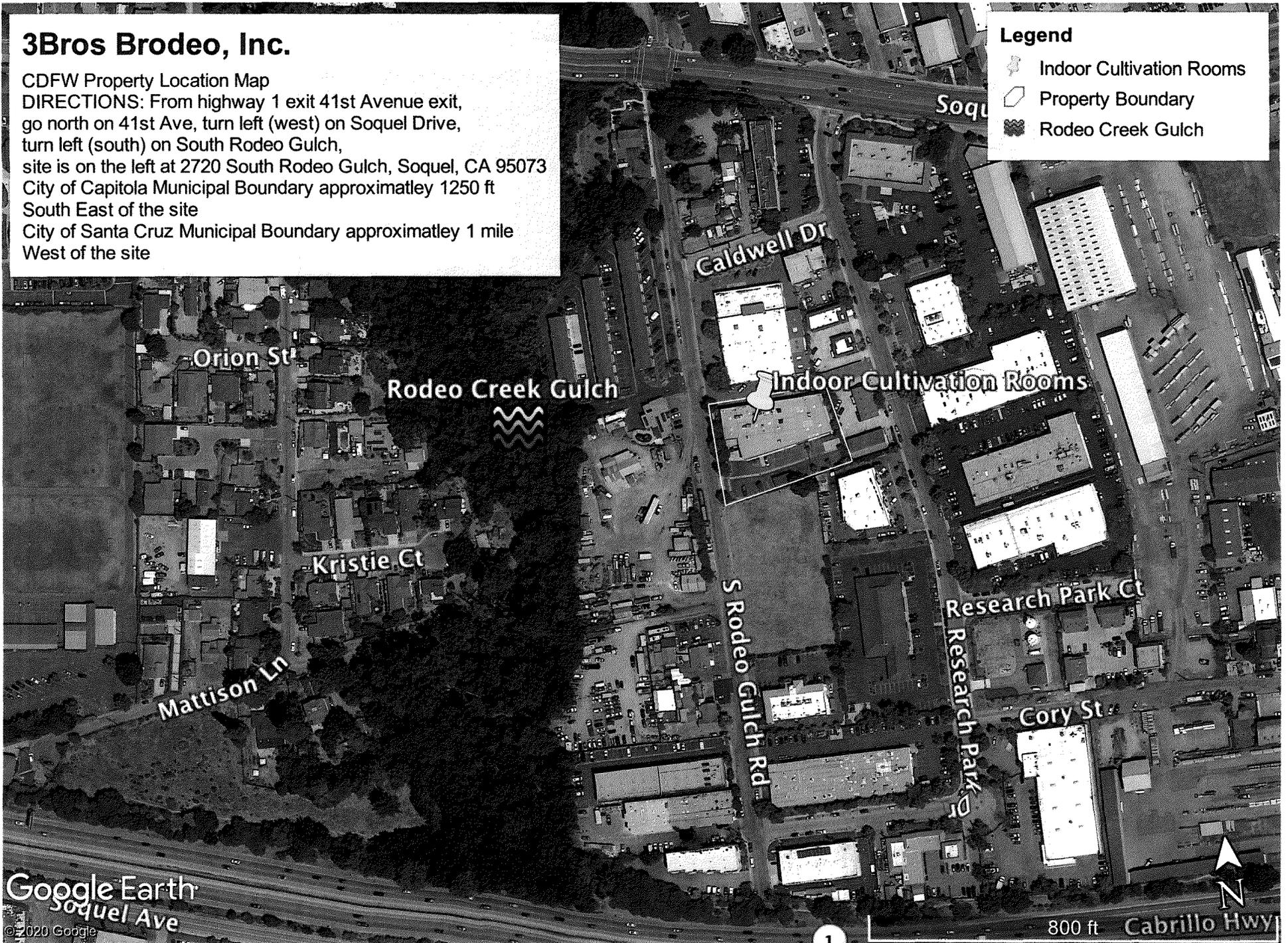
3Bros Brodeo, Inc.

CDFW Property Location Map

DIRECTIONS: From highway 1 exit 41st Avenue exit, go north on 41st Ave, turn left (west) on Soquel Drive, turn left (south) on South Rodeo Gulch, site is on the left at 2720 South Rodeo Gulch, Soquel, CA 95073
City of Capitola Municipal Boundary approximately 1250 ft South East of the site
City of Santa Cruz Municipal Boundary approximately 1 mile West of the site

Legend

-  Indoor Cultivation Rooms
-  Property Boundary
-  Rodeo Creek Gulch



NOTES:

WATER SOURCE: City of Santa Cruz Water Department

POWER SOURCE: Pacific Gas and Electric Company

MANUFACTURING ACTIVITIES: Infusion of cannabis flower pre-rolls, packaging and labeling of bulk cannabis extracts

TYPES OF MANUFACTURED PRODUCTS TO BE INFUSED, PACKAGED AND LABELED: Various non-edible cannabis extracts (shatter, wax, live resin, oil, etc.), pre-rolls (infusion)

PRIMARY SITE CONTACT: Tyler Smith, Co-CEO, 831.588.0852

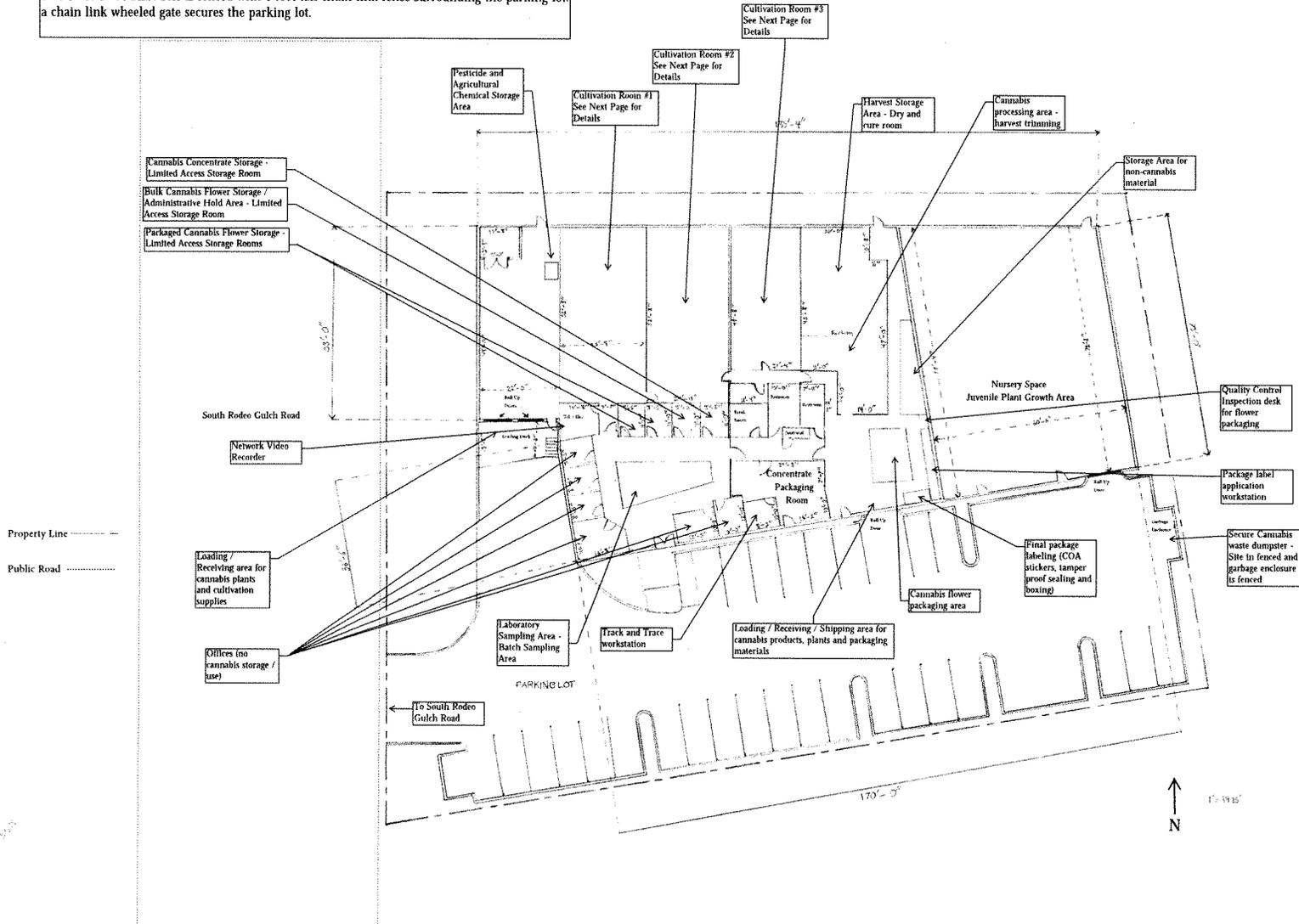
ALTERNATIVE SITE CONTACT: Bill Shevlin, Co-CEO, 831.332.6639

SECURITY NOTES: Site is fenced with 6 foot tall chain link fence surrounding the parking lot, a chain link wheeled gate secures the parking lot.

Brodeo, Inc.

2720 South Rodeo Gulch Road, Soquel CA 95073

Premise Diagram Page 1 of 3



Brodeo, Inc.

2720 South Rodeo Gulch Road, Soquel CA 95073

Premise Diagram Page 2 of 3 Supplemental Cultivation Information

NOTES:

 = CANOPY AREA

 = 1048 watt light

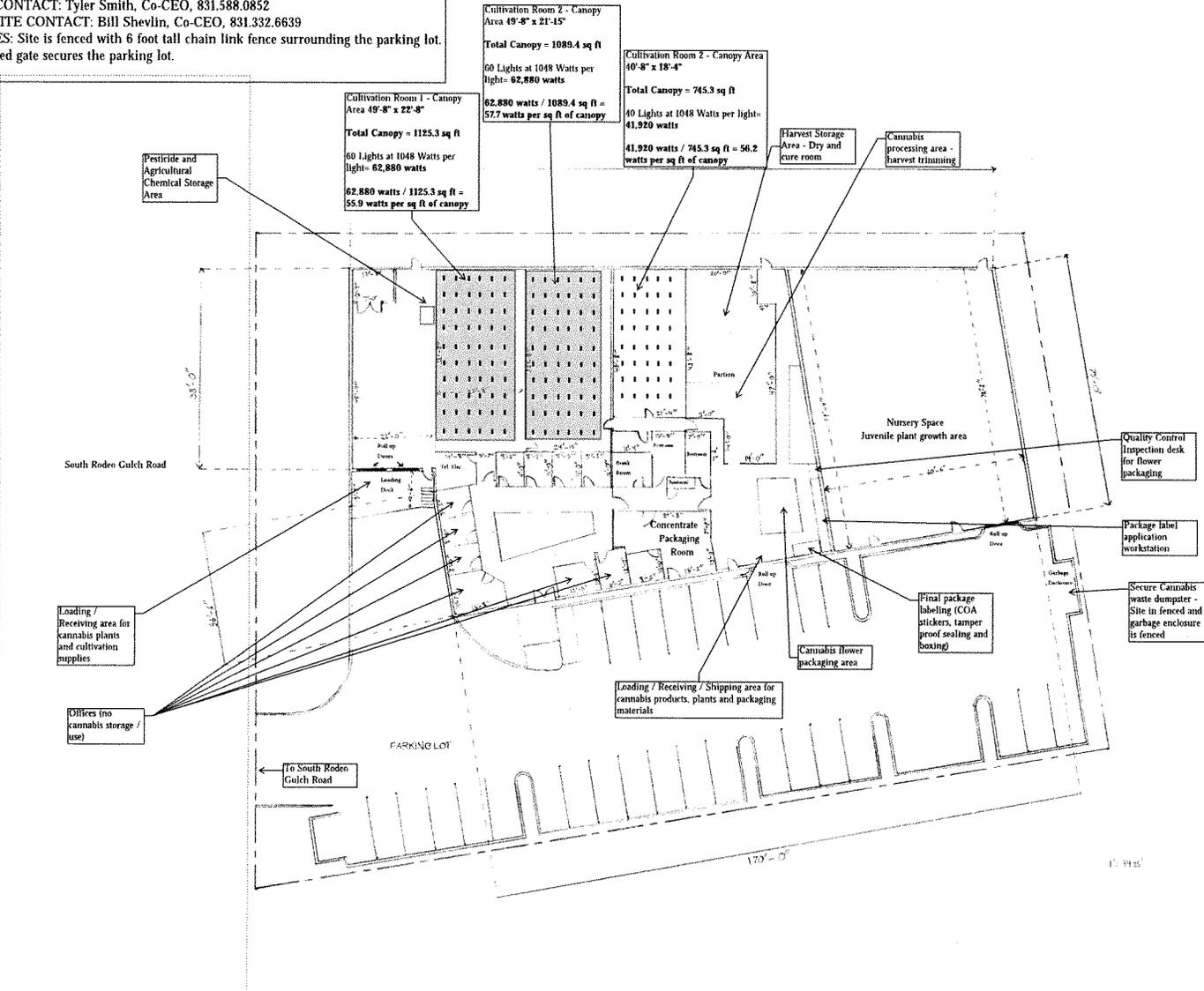
2,960 square feet of Canopy

Immature plants will be sourced from offsite nursery, therefore no dedicated immature plant growth area

PRIMARY SITE CONTACT: Tyler Smith, Co-CEO, 831.588.0852

ALTERNATIVE SITE CONTACT: Bill Shevlin, Co-CEO, 831.332.6639

SECURITY NOTES: Site is fenced with 6 foot tall chain link fence surrounding the parking lot. a chain link wheeled gate secures the parking lot.



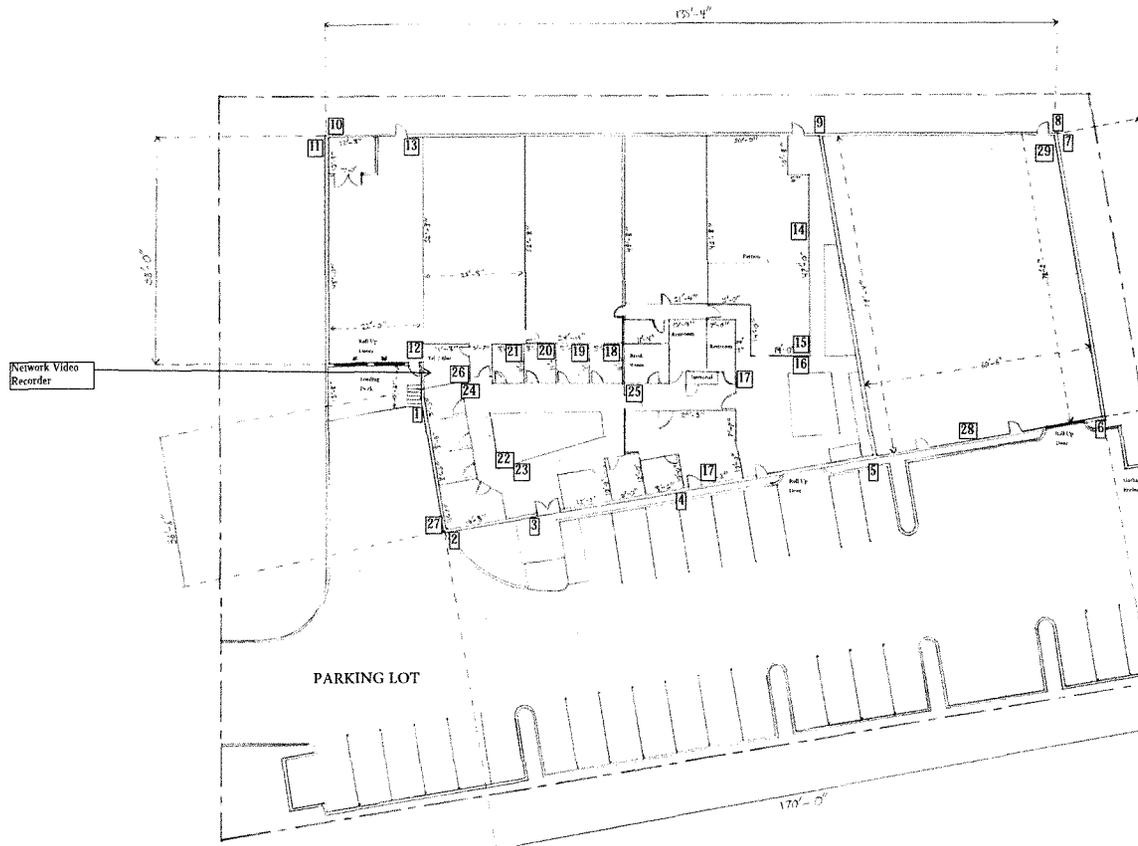
Brodeo, Inc. SECURITY PLAN

Premise Diagram Page 3 of 3

2720 South Rodeo Gulch Road, Soquel CA 95073

NOTES:

- # = Security Camera
- 29 security cameras in total
- 12 security cameras monitoring the exterior of the facility
- 17 security cameras monitoring the interior of the facility
- Security Bars (4 inch on center) are present on the interior of all windows
- Commercial grade steel doors and commercial grade locks are present on all doors
- Site is fenced with 6 foot tall chain link fence surrounding the parking lot, a chain link wheeled gate secures the parking lot.



- A. Security Plan Requirements**
This document is intended to fulfill the security plan requirements for the County of Santa Cruz. Additional security and training details are maintained in our employee handbooks and can be provided upon request.
- B. Perimeter Security**
Perimeter Security for the facility includes a standard six (6) foot tall chain link fence which prevents access to the parcel. The security fence runs along the street frontage and the perimeter of the parking lot. Perimeter security also includes signage on the fencing stating, "Private Property - No Trespassing." The exterior of the building is self is concrete and all of the exterior doors is the facility are commercial grade steel doors with commercial grade locks. All of the exterior windows to the facility are secured with steel bars spaced 4 inch (on center) apart. The security bars are located on the interior side of the windows to not alter the exterior appearance of the building as requested by the property owner. Signage indicating that the site has a monitored alarm system will be placed at various location on the exterior of the building.
The last part of the perimeter security is the camera system. There are 12 high definition cameras monitoring the exterior of the building. These cameras are clearly visible when approaching the building and they monitor the entire perimeter of the building.
The combination of these perimeter security measures is meant to follow the Crime Prevention Through Environmental Design (CPTED) principles to clearly identify that the facility is secure.
- C. Lighting**
No portion of the site will be illuminated between the hours of 10:00 p.m. and 6:00 a.m. by lighting that is visible from the exterior of the facility, except for the security lights on the exterior of the facility. These lights are fully shielded downward facing and meet international dark sky requirements.
- D. Cameras**
The video surveillance system consists of 27 cameras, with 12 exterior and 15 interior. All cameras record in all light conditions using a variety of digital fibers. There are a mix of camera types based on the camera location and all cameras have a minimum resolution of 1280 x 720 pixels at 15 frames per second. The network video recorder (NVR) or data storage device is transmission control protocol (TCP) capable of being accessed through the internet and all owners of the company have 24 hour access on their phones. The video surveillance system is always on and recording with the capability of storing at least 30 days worth of recordings.
The cameras also include date and time stamps on all video. The NVR is equipped with a failure notification system that provides notification to the alarm company and the owners of failure of the video surveillance system or video surveillance system storage device. The video surveillance system shall be able to record all pre-determined surveillance areas in any lighting conditions. Cameras feature automatic daylight functionality with automatic IR filter that switches to daylight modes depending on the light level.
Their camera placed along the entire perimeter of the building and through out the interior. The interior cameras monitor all cannabis handling operators, the hallway, all four limited access storage rooms, the electrical room which houses the NVR and the interior area leading to all egress points.
- E. Floor Plan**
A premises diagram that includes a "floor plan" is included in the application packaged. The premise includes security bars on all windows and metal security doors. All doors are secured by commercial grade locks.
- F. Cannabis and Cash Storage**
There are four limited access storage rooms for secure cannabis storage. These rooms include cameras and are secured with solid core wooden commercial grade doors and commercial grade locks. We do not anticipate storing any cash onsite. The use of cash will be minimized as we do not participate making sales directly from this business to any businesses we do not currently own. If cash storage is necessary a safe to the foundation is a minimum of 500lbs will be purchased (as this is the minimum weight requirement our insurance provider requires) and secured to the foundation.
- G. Location Access**
The site is secured by a mix of security camera, a fence for a physical barrier to the parcel and security doors on all egress points. As previously mentioned exterior doors are steel and are secured with commercial grade locks. Interior doors to the limited access storage rooms are solid core wood with commercial grade locks. Access to the facility will be controlled by onsite managers who will be responsible for dialing the alarm at the start of all shifts and opening the exterior doors for individual employees as they arrive at the start of their shifts.
Exterior doors will remain locked at all times and while deliveries our occurring the fence at the entrance of the property will be shut and locked. All non-employees who visit the facility will be required to sign in and will be required to where a visitor badge while onsite. The only visitors who are expected to entrance the limited access storage rooms will be third party laboratories as required for sampling purposes. Anyone entering a limited access storage room will be accompanied by employees at all times.
All employees will be required to where their employee badges every time they are on site. These badges include a photo of the employee's face, the employee ID number and the Company name.
- H. Daily Limits**
Daily limits for cannabis sales are not applicable to our business and we will not have any retail sales.
- I. Employee Security Training / Education - Inventory Control**
Employee training will include a mixture of in person one on one training and some limited group trainings, once restrictions associated with COVID 19 are lifted. In addition two staff at the facility will be required to undergo OSHA 30 hour training as required by the BCC. All training will be documented on monthly logs. All initial training will include all security procedures so employees understand the procedures associated with potential burglaries, reporting of diversion, procedures for interactions with regulatory law enforcement, that all of their movements are recorded and that consumption of cannabis and alcohol are not permitted at the facility. Inventory controls will be maintained through methods established at our other operations which include:
Weigh in and weigh out procedures for all packages;
Waste generation tracking;
No personal items within the work area other than cell phones and keys;
Two stage QC on all packaged items;
Stage one spot check weights during the packaging operations;
Stage two spot check weights prior to placing a kit on all trays of packaged material;
Tracking all materials at all stages including:
Harvest wet weights;
Harvest dry weights;
Cannabis flower weights;
Cannabis trim weights;
Cannabis waste;
Comparing of these weights versus established values to prevent diversion; and
Random inventory checks of all material onsite on at least a monthly base.
- J. Security Guards**
We will not be employing security guards at this location as it is not required by the County or the State.
- K. Transportation (Distributors)**
We will be transporting cannabis from this site at some point in the future. At this time we only plan on utilizing our distribution operations to package cannabis flower imported to the site and to have cannabis goods sampled by a third party laboratory for testing. All transportation aspects of the operation will be handled by our other company West Cof Provisions (DBA SBros Santa Cruz).
- L. Delivery Security**
We are not pursuing a retail business license and as described in the County Form CLO 1008b this section is applicable to delivery operations which transfers cannabis goods from a retailer to a customer. Therefore, this section is not applicable to our business.
- M. Inventory Tracking**
Inventory tracking is completed using a combination of the State Metric system, as required by the BCC, and a third party track and trace program Grow Flow. Grow Flow is Metric integrated therefore we do all track and trace data input and inventory reconciliation through Grow Flow. We access the Metric system to generate manifests, accept shipments of cannabis plants and cannabis products. Inventory reconciliation is done weekly. Daily reconciliation occurs of all materials packaged for the day (we will track material packaged in compared to the input, output and waste means to ensure diversion is not occurring).
- N. Waste Disposal**
All cannabis waste containers will be maintained closed. Cannabis waste will be disposed of as green waste and made unrecognizable prior to placing the material in the waste receptacle. The waste receptacle is maintained outdoors but secured behind the perimeter fence. Cannabis waste will remain indoors until the day the waste is scheduled to be picked up from the site.

Project Description Preparation Form

Lead Agency: County of Santa Cruz Cannabis Licensing Office

Applicant Entity/Business Name: 3Bros Brodeo Inc. (Tyler Smith)

License Type(s): Class M- Cultivation, Manufacture, Distribution

Date: October 20, 2020

1. Source(s) of Information:

Identify Sources: 3Bros Brodeo Project Statement Version 2

2. Project Location:

Describe Project Location: 2720 South Rodeo Gulch Rd., Soquel CA (Lat: 36 58 40 0835; Long: -122 1 21.2146)

Maps Included: 3Bros Brodeo CDFW Map, Brodeo County Premise & Security Diagram

3. Description of Project Site:

General Topographic Features (slopes and other features): 1 acre flat parcel in an industrial park

Natural Features (general vegetation types, presence of streams and wetlands, forested areas):
Landscape plantings along Rodeo Gulch Rd. frontage.

Existing Land Uses/Zoning: Light Industrial (M-1) zoning in an existing industrial park. Cannabis uses are principally-permitted in the Soquel Research Park.

Existing Constructed Features (buildings, facilities, and other improvements): Existing commercial/industrial 15,000 sf. structure with paved parking area and landscape plantings.

Surrounding Land Uses (including sensitive uses): Commercial/industrial buildings and a non-conforming single-family residence.

4. Required Site Improvements and Construction Activities:

Site Improvements: The project consists of cannabis cultivation, manufacture, and distribution indoors within an existing industrial/commercial building. The structure will be remodeled to suit the proposed cannabis uses. Including interior lighting, ventilation, and security equipment installation.

Construction Activities: Interior remodeling. No exterior construction.

5. Operation and Maintenance Activities:

Hours of Operation/Work Shifts: 7:00am to 7:00pm

Number of employees (total and by shift): Up to 18 regular/full-time employees, including 6 cultivation workers and variable staffing/shifts for manufacture and distribution activities.

Estimated Daily Trip Generation: 22 or fewer round-trips per day on average.

Source(s) of Water: Santa Cruz City water utility

Wastewater Treatment Facilities: Sewer

Source(s) of Power: PG&E service

- 6. Environmental Commitments:** “Best Management and Operational Practices” (BMOP) requirements apply to all non-retail commercial cannabis businesses to reduce the environmental impacts of cannabis operations (Santa Cruz County Code Ch. 7.128.090.(A)(1)(a)(xi). A BMOP plan for this project was reviewed by the Cannabis Licensing Office and is kept on file with the license application. BMOP requirements for this project are noted below:

BMOP Section D. “Operational Requirements” adopted by 3Bros Brodeo and approved by the Cannabis Licensing Office include: Storage of Pesticides, Fuel, and Hazardous Materials (D.5.), Waste (D.8.), and Energy Conservation (D.10.).

Exceptions to categorical exemptions cited for the proposed non-retail cannabis project include: Class 1 “Existing Facilities”. The County of Santa Cruz Cannabis Licensing Office has determined that the proposed project 1) is not visible from scenic highways and/or impactful to scenic resources, 2) is not located on a “Cortese List” site, 3) does not substantially change a historic resource, 4) is likely to not contribute to a significant cumulative environmental impact, 5) is not subject (by location and/or design) to unusual circumstances that would reasonably contribute to a significant environmental impact.

- 7. Environmental Permits Required** (List all required federal, state, and local permits required):

Agency	Permit	Status
California Department of Food and Agriculture, CalCannabis	Annual Cultivation License	Pending
California Department of Fish and Wildlife	Section 1602 Lake or Streambed Alteration Agreement	EPIMS-SCR-12871-R3-3Bros Brodeo, Inc.- 2020
State Water Resources Control Board / Regional Water Quality Control Board	Water quality protection program	WQ-2019-0001-DWQ
California Department of Public Health	Annual Manufacture License	pending
Bureau of Cannabis Control	Annual Distribution License	pending