



County of San Benito

RESOURCE MANAGEMENT AGENCY

2301 Technology Parkway, Hollister, CA 95023

(831) 637-5313 • FAX: (831) 637-5334

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

The San Benito County Resource Management Agency 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: PLN250047

Cannabis Permit Number: 35-2026-0002

Assessor Parcel Number: 013-040-025

Project Location: 0 Frazier Lake Road, Hollister, CA 95023 (see attached map)

Project Title: PLN250047 Commercial Cultivation

Project Description: Outdoor cannabis cultivation. Project encompasses a maximum of 96.6 acres of canopy on 154.5 of active farming area (see attached "Project Description Preparation Form_0 Frazier Lake Road" and "Site Diagram_0 Frazier Lake Road").

Person or Agency Proposing Project: Justin Hammer (Clean Source Distribution, LLC.)

Contact Email: justinhammer4545@gmail.com

Contact Phone Number: (925) 886-9272

- 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**

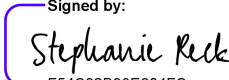
Specify type: 15301 Class 1: Use of existing facilities; 15304 Class 4: Minor Alterations to Land; 15311 Class 11: Accessory Structures.

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.)
Class 4	Minor Alterations to Land	Consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. (Cal. Code Regs., tit. 14, § 15304.)
Class 11	Accessory Structures	Consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities (Cal. Code Regs., tit. 14, § 15311.)

F. Reasons why the project is exempt:

Cultivation on an existing agriculturally productive property.

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

Signed by: 
E54C32B38E604EC...
 Stephanie Reck, Senior Planner

Date: 4/3/2026

Email: sreck@sanbenitocountyca.gov

Area Code/Telephone/Extension: (831) 718-7960

ATTACHMENTS:

- “Project Description Preparation Form_0 Frazier Lake Road”;
- “Site Diagram_0 Frazier Lake Road”;
- “BMOP_0 Frazier Lake Road”;
- “San Benito County CBRP Permit 35-2026-0003”.

Project Description Preparation Form

Lead Agency: County of San Benito Resource Management Agency

Applicant Entity/Business Name: Clean Source Distribution, LLC.

License Type(s): Cultivation

Date: April 3, 2026

1. Source(s) of Information:

Identify Sources: San Benito County License Application Submission.

2. Project Location:

Describe Project Location: 0 Frazier Lake Road, Hollister, CA 95023. 36.948416, -121.476982
for 96.6 acres of canopy on 154.5 of active farming area on APN: 013-040-025.

Maps Included: Property and Premises Diagram included

3. Description of Project Site:

General Topographic Features (slopes and other features): Large agricultural parcel consisting of flat lands with open fields located on land traditionally used for row crops. The property is currently vacant and has no existing structures. The parcel totals 162 acres in size.

Natural Features (general vegetation types, presence of streams and wetlands, forested areas): The site is currently an open dirt field, flat and vacant, and has been used for commercial row crops in the past. The site is partially within FEMA Flood Zone A in the upper northeast corner, has wetland including a fresh water pond on the southeast corner of the parcel, is 1.15 miles east from the Calaveras Fault, and does not have any geophysical landslide data mapped in the area.

Existing Land Uses/Zoning: These parcels have a General Plan designation of Agriculture (A) and a zoning designation of Agricultural Productive (AP). The intent of the AP zoning district is to provide for areas within the county to be used for agricultural production of any type as set forth in the general plan, including agriculture support uses, vineyards, wineries and winery supporting land uses. Low-density residential uses, and the preservation of prime farmland. Low-density and farmworker housing are also permitted. Cannabis cultivation is defined as agricultural and is a principally-permitted use with the AP zone.

Existing Constructed Features (buildings, facilities, and other improvements): The project site is vacant and has no buildings, facilities, fences, or other improvements.

Surrounding Land Uses (including sensitive uses): All surrounding parcels have a General Plan Designation of Agriculture (A) with a zoning district of Agricultural Productive (AP). Most parcels are vacant and are traditionally used for row crops whether actively farmed or not. To the northeast of the parcel is Frazier Lake Airpark. The Airport Land Use Commission conditionally approved the project requiring an Avigation Easement.

4. Required Site Improvements and Construction Activities:

Site Improvements: The project consists of cannabis cultivation outdoors, 10 parking stalls within the licensed premises on the northeast corner of the located outside the perimeter gate for employees and distribution vehicles. Site improvements include motion-activated lighting, security cameras, six-foot-high chain-link fence with black vinyl coating, and lockable gates with Knox Key Switched pursuant to Fire Department regulations.

Construction Activities: Installation of lighting, security cameras, fencing, and gates. There will be no tree removal, grading, or excavation.

5. Operation and Maintenance Activities:

Hours of Operation/Work Shifts: 6:00am to 6:00pm

Number of employees (total and by shift): 2 full-time employees and 10 part-time workers during harvest.

Estimated Daily Trip Generation: 10 or fewer round trips per day on average with potentially 3 deliveries of seedlings per year and around 100 pickups per year from distributors during harvest.

Source(s) of Water: Agricultural well located on the parcel.

Wastewater Treatment Facilities: Portable toilet facility.

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. A BMOP plan for this project was reviewed by the County of San Benito Cannabis Coordinator and is kept on file with the license application. BMOP requirements for this project are noted below:

The applicant’s BMOP includes on-site protections and security measures including: implementing fire protection measures and backup generator systems to ensure continuous operations of critical security systems including lighting, cameras, maintenance and implementation of fencing and security, emergency evacuation plan, waste management plan, and water storage.

The applicants BMOP includes operational practices including use of USDA-approved organic amendments and techniques featuring no synthetic fertilizers, pesticides, or artificial grow media and avoiding plastic mulches, synthetic landscape fabric, or other non-biodegradable materials.

Exceptions to categorical exemptions cited for the proposed non-retail cannabis project include: Class 1 “Existing Facilities”, Class 4 “Minor Alterations to Land”, Class 11 “Accessory Structures”. The County of San Benito Resource Management Agency 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
Department of Cannabis Control	Annual Cultivation License	Pending Approval
California Department of Fish and Wildlife	Section 1602 Lake or Streambed Alteration Agreement	N/A
State Water Resources Control Board / Regional Water Quality Control Board	Water quality protection program	N/A
San Benito County Resource Management Agency	Zoning Clearance	Approved 2/12/2026
San Benito County Resource Management Agency	Annual Cannabis Business Permit	CBRP Permit 35-2026-0003

San Benito County Parcel Report

04/03/2026

APN: 0130400250 Current Document: 2025R0000771 Jurisdiction: San Benito County

Owner: TRANSIT PLAZA LLC Owner Address: 8747 LLAMA LN Owner CSZ: GILROY CA 95020

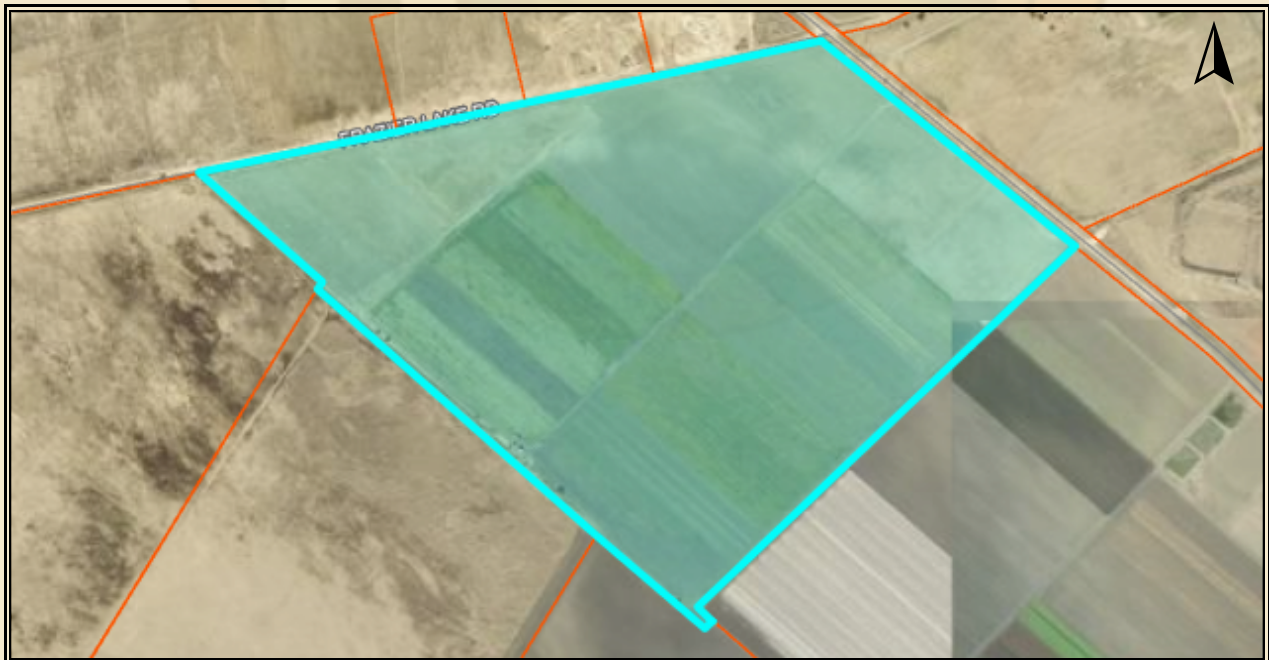
Site Address: 0 FRAZIER LAKE RD Site CSZ: HOLLISTER CA 95023 Acres: 161.06

Land Value: 1907400 Recorded Map: 10-41-SM Use Code: AROW

Fault Zone: NO Flood Zone: Flood Zone A Partial Fire Hazard: Moderate

County GP: Agriculture County Zoning: Agricultural Productive

Note: This parcel is located in an Airport Influence Area. A portion of this parcel is located in an Airport Safety Zone. Development on this parcel requires review by ALUC staff.

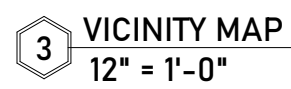


OWNER:
EDRO IBARRA
PEBBLE BEACH INVESTMENT
GROUP, LLC
13 PAULSEN RD
ATSONVILLE, CA 95076
31.884.3124
ibarra@pebblebeachgroup.com

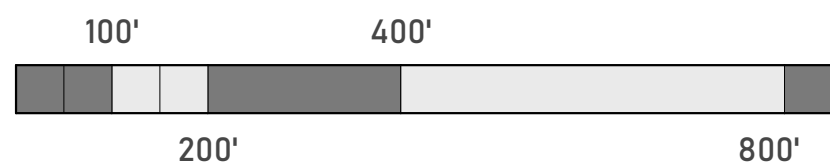
APPLICANT:
LEAN SOURCE DISTRIBUTION LLC
OWNER : JUSTIN HAMMER (100%)
CREEKLEDGE CT
ANVILLE CA 94506

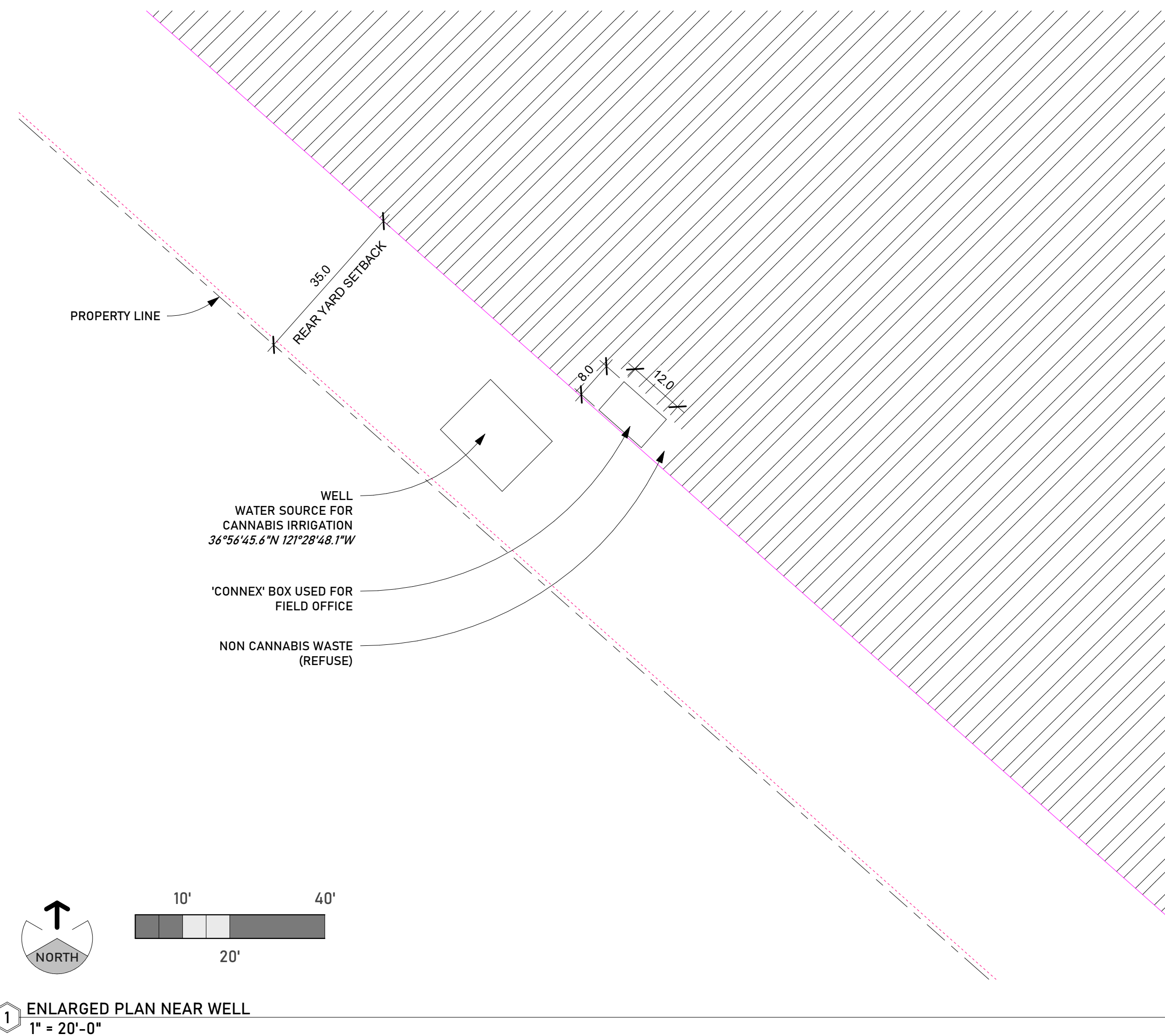
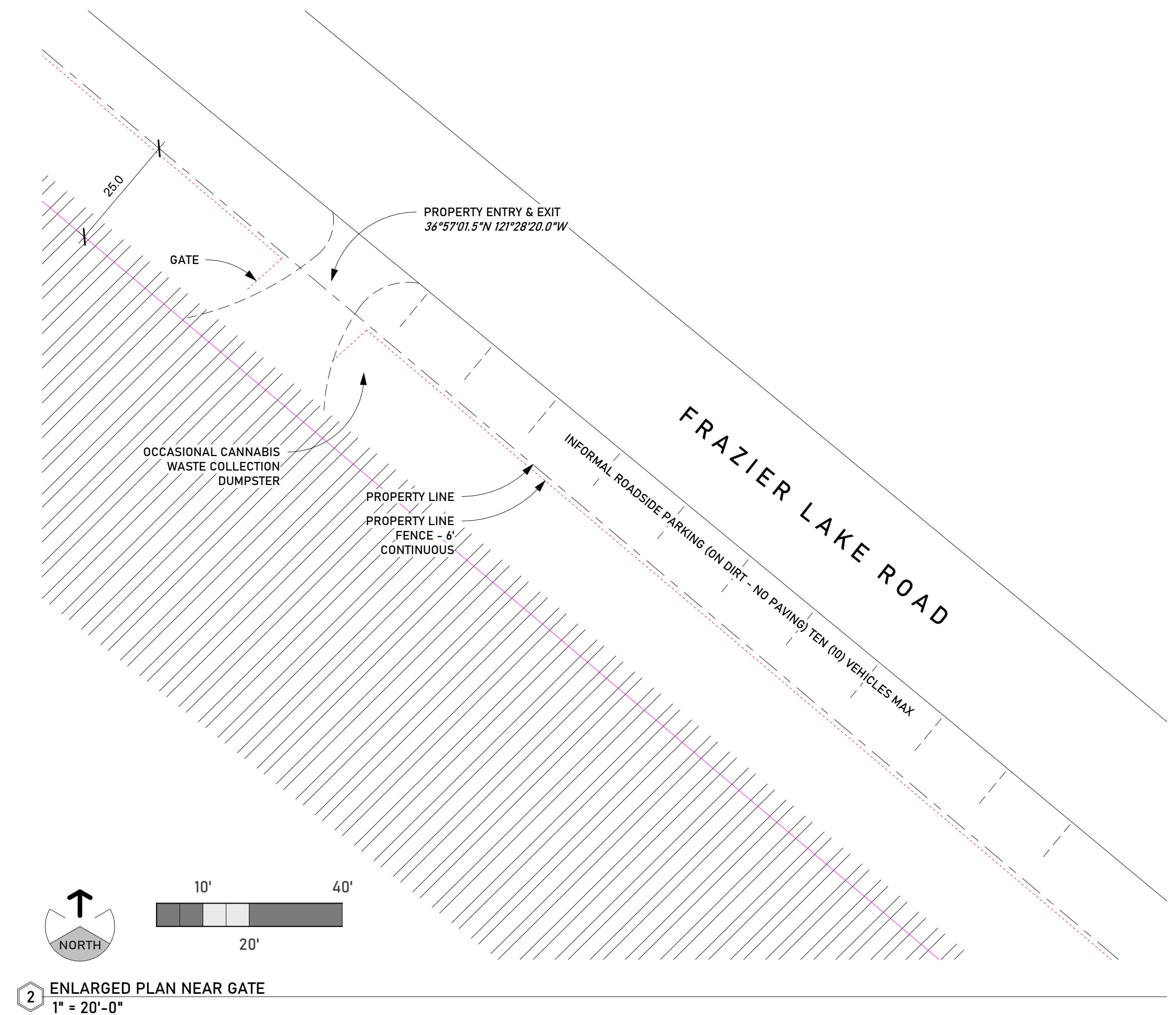
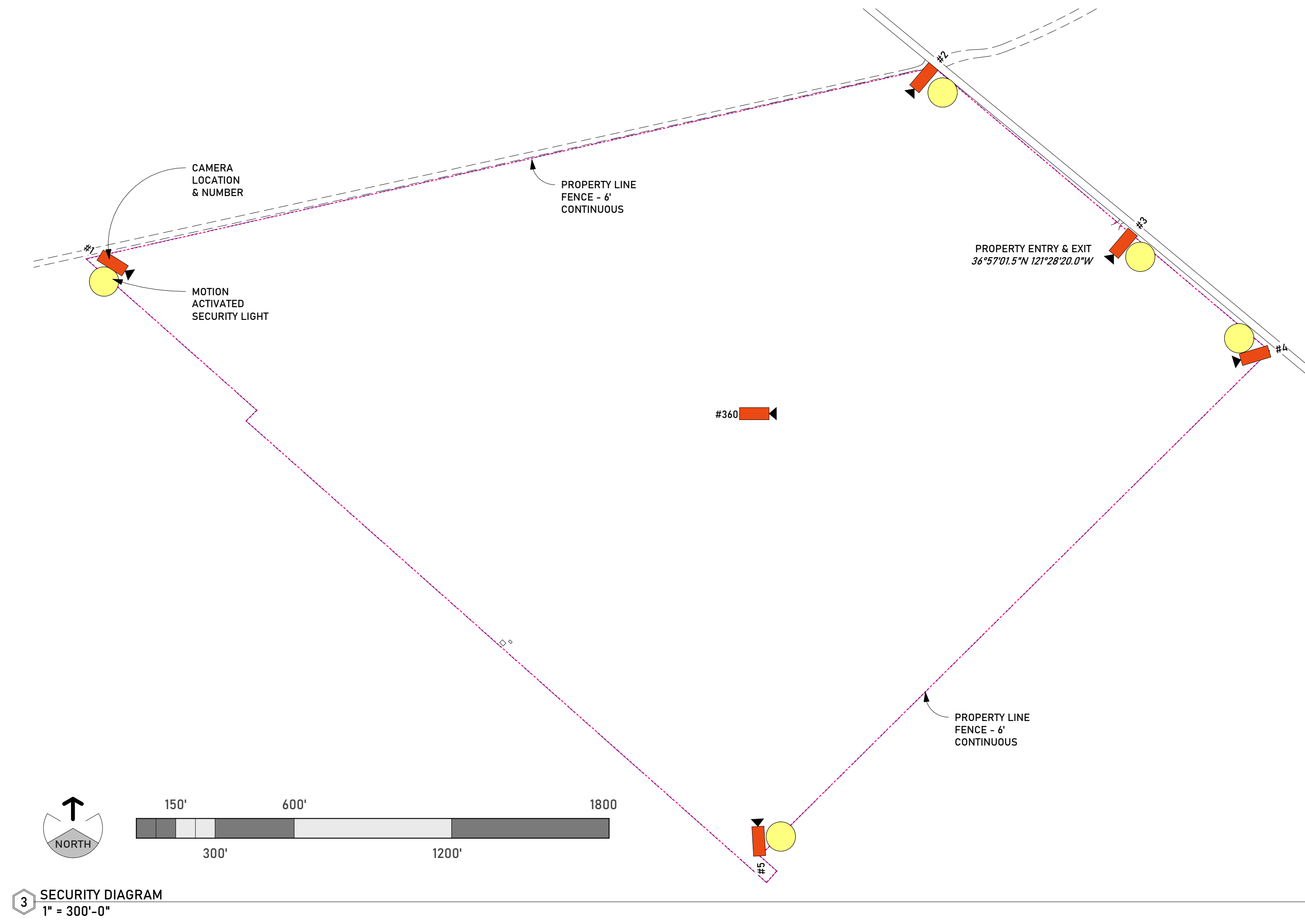
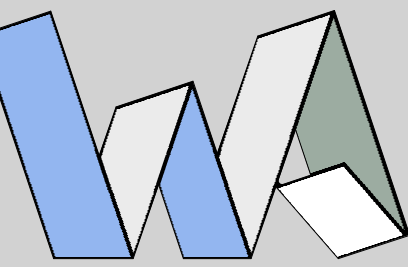
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HARVEST STORAGE IS COTERMINOUS WITH THE CANOPY AREA
PLANTS ARE HARVESTED IN PLACE, STAGED & SENT TO OFF-SITE
PROCESSOR OR STORAGE BY LICENSED THIRD-PARTIES





WHITFIELD
ARCHITECTS

3426 Folsom Street
San Francisco, California
415 . 724 . 6279
WHITFIELD-ARCHITECTS . COM

FRAZIER LAKE ROAD FARM

0 Frazier Lake Rd
Holister, CA 95023

APN 0130400250

OWNER:
PEDRO IBARRA
PEBBLE BEACH INVESTMENT
GROUP, LLC
143 PAULSEN RD
WATSONVILLE, CA 95076
831.884.3124
Ibarra@pebblebeachgroup.com

APPLICANT:
CLEAN SOURCE DISTRIBUTION LLC
OWNER: JUSTIN HAMMER (100%)
10 CREEKLEDGE CT
DANVILLE CA 94506

ISSUED
10/09/25

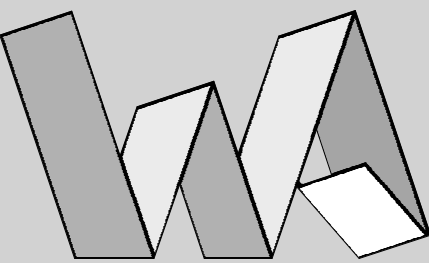
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SITE /
PREMISES
DIAGRAM

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WHITFIELD ARCHITECTS
3426 Folsom Street
San Francisco, California
415.724.6279
WHITFIELD-ARCHITECTS.COM

FRAZIER LAKE ROAD FARM

0 Frazier Lake Rd
Holister, CA 95023

APN 0130400250

OWNER:
PEDRO IBARRA
PEBBLE BEACH INVESTMENT GROUP, LLC
143 PAULSEN RD
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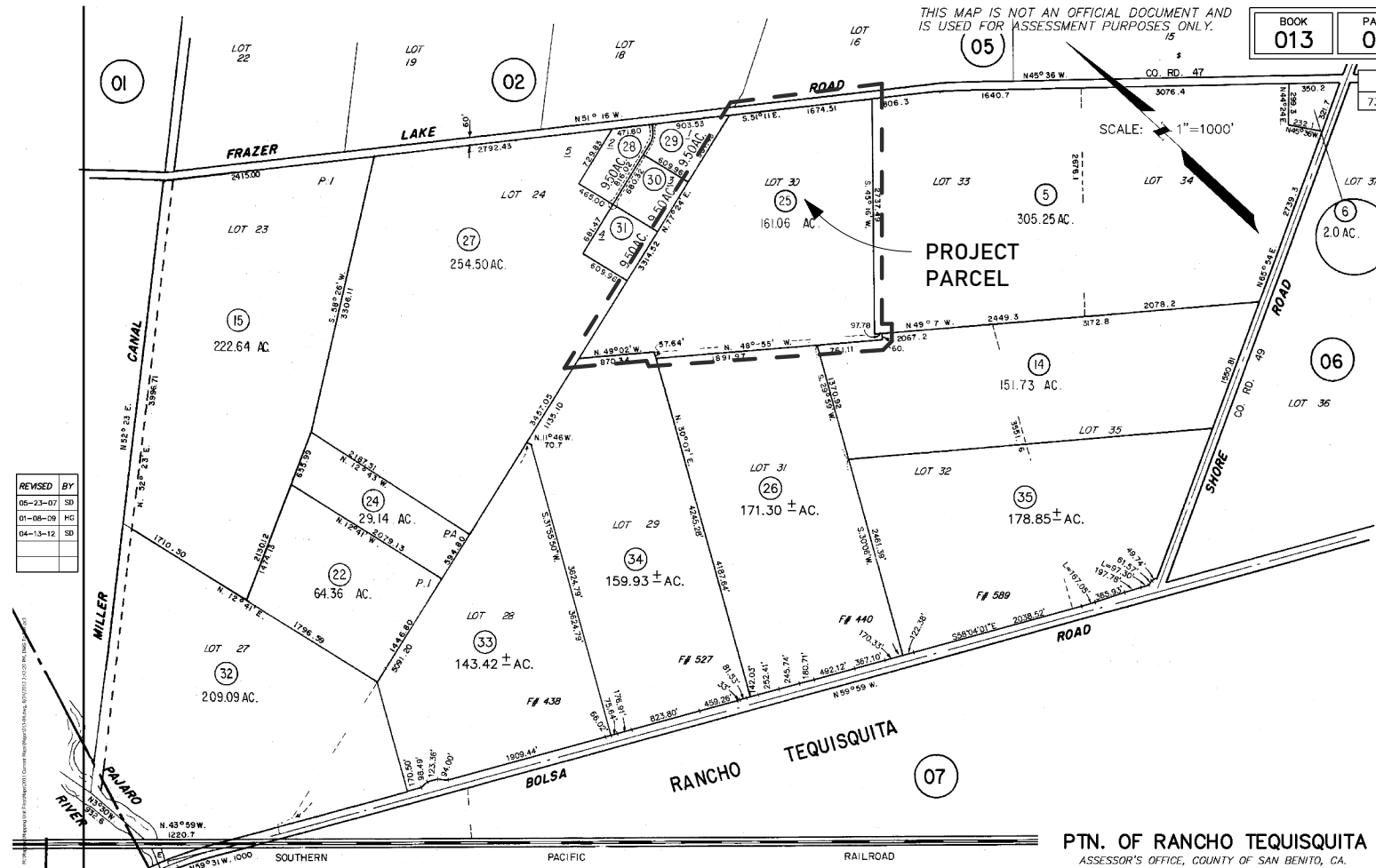
APPLICANT:
CLEAN SOURCE DISTRIBUTION LLC
OWNER: JUSTIN HAMMER (100%)
10 CREEKLEDOE CT
DANVILLE CA 94506

ISSUED
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NAME
PROPERTY DIAGRAM

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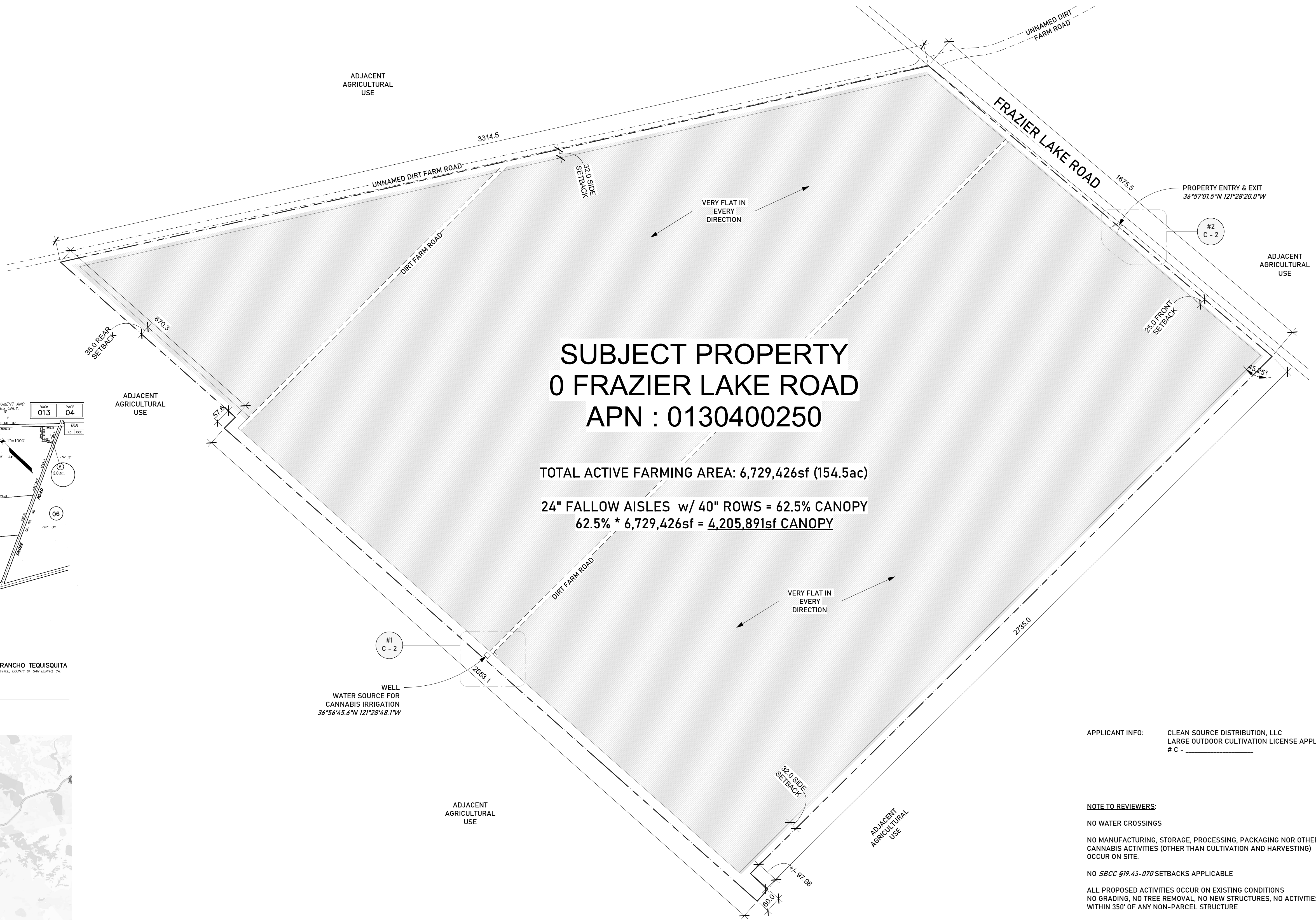
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2 ASSESSOR'S PARCEL MAP
NOT TO SCALE



3 VICINITY MAP
12" = 1'-0"



1 PROPERTY DIAGRAM
1" = 200'-0"

APPLICANT INFO: CLEAN SOURCE DISTRIBUTION, LLC
LARGE OUTDOOR CULTIVATION LICENSE APPLICATION
C -

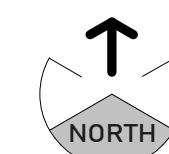
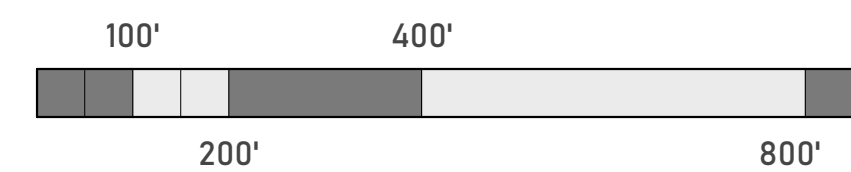
NOTE TO REVIEWERS:
NO WATER CROSSINGS

NO MANUFACTURING, STORAGE, PROCESSING, PACKAGING NOR OTHER CANNABIS ACTIVITIES (OTHER THAN CULTIVATION AND HARVESTING) OCCUR ON SITE.

NO SBCC §19.43-070 SETBACKS APPLICABLE

ALL PROPOSED ACTIVITIES OCCUR ON EXISTING CONDITIONS
NO GRADING, NO TREE REMOVAL, NO NEW STRUCTURES, NO ACTIVITIES WITHIN 350' OF ANY NON-PARCEL STRUCTURE

HARVEST STORAGE IS COTERMINOUS WITH THE CANOPY AREA
PLANTS ARE HARVESTED IN PLACE, STAGED & SENT TO OFF-SITE PROCESSOR OR STORAGE BY LICENSED THIRD-PARTIES



Best Management Operational Practices (BMOP)

Clean Source Distribution - Outdoor Cannabis Cultivation Security Plan

A. Security Plan Requirements:

Clean Source Distribution is committed to implementing and maintaining a comprehensive Security Plan to prevent the unauthorized diversion of cannabis material, protect the health, safety, and welfare of our workers and the public, restrict access to legal consumers (not applicable to cultivation), and deter trespass and theft of cannabis or cannabis products. This Security Plan outlines the clear, succinct, and measurable processes we will employ to address.

Cannabis Waste Disposal: Cannabis waste will be managed in strict accordance with federal, state, and local laws,. We will ensure that all cannabis waste is properly destroyed and rendered unusable before disposal through a licensed waste disposal company. See

 [Waste Management Plan - CSD 05.01.2025.pdf](#)

On-Site Protection: Our Security Plan includes strategies for on-site protection from potential issues:

- **Power Outages:** We will maintain a backup generator system to ensure continuous operation of critical security systems, including cameras and alarms, during power outages.
- **Fire:** We will implement fire prevention measures, including maintaining clear vegetation buffers around cultivation areas, having readily accessible fire extinguishers, and developing an emergency evacuation plan. This plan will be communicated to all employees during training (Section I).
- **Storage:** Cannabis storage (harvested product) will not occur onsite. All harvested products will be transported to a licensed storage facility in California upon harvest.
- **Access Control:** Access to the cultivation site and limited-access areas will be strictly controlled as detailed in Section G (Location Access).
- **Credentialing:** All employees will be issued identification badges as described in Section G (Location Access).
- **Security Officers:** As an outdoor cultivation site not engaged in retail sales, we do not anticipate the need for on-site security guards during regular operations, based on Section J. However, we will reassess this need based on risk assessments and consultations with the Office of the Sheriff and RMA.
- **Cameras:** A comprehensive digital video surveillance system will be installed and maintained as detailed in Section D (Cameras).
- **Alarms:** Operating alarm systems will be implemented in any enclosed structures on the licensed premises, as described in Section E (Floor Plan).
- **Internal Theft:** Measures to prevent internal theft include limited access to storage areas, comprehensive inventory tracking (Section M), and employee training on security protocols and reporting procedures (Section I).

Security Plan details are provided in this narrative format, explaining how each requirement will be implemented or maintained. A separate site plan will be submitted as part of the Use Permit application, including a sheet titled "Security Elements" identifying structural security measures, fence locations, and camera placements.

B. Perimeter Security:

Clean Source Distribution will implement the following perimeter security measures for our outdoor cultivation site:

- **Fencing Location, Type, and Height:** The perimeter of the cultivation area will be secured with a six-foot-high wildlife friendly opaque fence to minimize visual impact and blend with the surrounding terrain. The fence line will be clearly depicted on the site plan. The fencing will be sited to avoid unnecessary tree removal, and the least amount of fencing necessary to secure the cultivation areas will be utilized.
- **Wildlife Consideration:** Fencing will be designed and installed to avoid obstructing wildlife movement within or through the parcel and will not cause animals to become trapped, injured, or disoriented. Where protection from wildlife intrusion is necessary for specific grow areas, the smallest area possible will be fenced immediately surrounding the grow site.
- **Limited Access Areas:** Only badged employees, state and city law enforcement and industry badged buyers will be allowed onsite.
- **Signage:** Clearly marked "Private Property - No Trespassing" signs will be posted at regular intervals around the perimeter of the licensed area.
- **CPTED Principles:** We will strive to apply Crime Prevention Through Environmental Design (CPTED) principles by ensuring the perimeter security measures are well-maintained and do not create blind spots for potential intruders. The black vinyl coating on the fencing is intended to blend with the environment. Razor wire fencing will not be used. Tarpaulins, scrap material, dust guard fencing, privacy netting, or woven or non-woven polyethylene plastic, hedges, or bushes will not be used as fencing.

C. Lighting:

- **Exterior Lighting Specifications:** All exterior lighting used for security purposes will be fully shielded, directed downward, and hooded to prevent light from casting off the property onto neighboring properties or skyward, in compliance with International Dark Sky Association standards.
- **Security Lighting:** Lighting necessary for security during restricted hours will consist solely of motion-sensor lights strategically placed along the perimeter fencing and at entry points. These lights will be activated only when motion is detected, minimizing adverse impacts on surrounding properties.

D. Cameras:

- **Camera Resolution:** All cameras will have a minimum resolution of 1280 × 720 pixels and be capable of producing a live feed at each entry point.
- **Internet Access:** The surveillance system storage device or the cameras will be TCP capable of being accessed through the internet.
- **Recording Quality:** The video surveillance system will always be able to record clear and effective images of the area under surveillance in all lighting conditions.
- **Still Photograph Capability:** The system will have the capability to produce a still photograph from any camera image.
- **Camera Mounting:** Each camera will be permanently mounted and in a fixed location.
- **Continuous Recording:** Cameras will record continuously 24 hours per day.
- **Recording Retention:** Surveillance recordings will be kept for a minimum of 40 days.
- **Inspection and Access:** Surveillance recordings will be readily available for inspection by cannabis licensing officials and the Office of the Sheriff on-site immediately upon request. Copies of recordings will be provided upon request within the specified timeframe.
- **Failure Notification System:** The video surveillance system will be equipped with a failure notification system that provides immediate notification to Clean Source Distribution personnel of any interruption or failure of the video surveillance system or storage device.
- **Periodic Audits:** Video coverage will be audited on a periodic basis to ensure all cameras are in good working condition and provide adequate coverage.

Security Plan Acknowledgement:

- **Operation and Responsibility:** The video surveillance system will be operated by designated security personnel or management. They will be responsible for regularly monitoring the system and ensuring continuous recording.
- **Camera Location Diagram:** A to-scale diagram showing the location of all cameras, with each camera assigned a unique number for identification, will be included in the site plan. A corresponding camera index will list each camera number and its specific entry point of view.
- **Coverage Areas:** Cameras will be placed in locations that allow for clear recording of activity and will allow for the clear and certain identification of any person and activities at all exterior gates and access points to the property.

E. Floor Plan:

A detailed premises diagram, including a "floor plan" showing the boundaries of the property and the proposed licensed premises, with all dimensions, entrances and exits, and interior partitions of any enclosed structures, will be included in the site plans.

- **Commercial Cannabis Activities:** All commercial cannabis activities, including cultivation map, secured waste storage and secured surveillance infrastructure will be clearly identified on the diagram with designated areas. All these areas will be considered limited-access areas.

Security Plan Acknowledgement:

- **Third-Party Security Company Identification:** The name, contact information, and license number of the third-party security company contracted to install, maintain, and monitor the alarm system will be provided to the Office of the Sheriff and RMA.

F. Cannabis and Cash Storage:

- Clean Source Distribution will not have any cash storage onsite.
- The secure storage shed/container will be securely anchored to the ground to prevent it from being easily moved.

G. Location Access:

Clean Source Distribution will control access to the cultivation site and limited-access areas as follows:

- **Authorized Access Only:** Only employees of Clean Source Distribution and other authorized individuals (e.g., regulatory officials, necessary contractors) will be allowed access to the limited-access areas of the permitted/licensed premises.
- **Escorted Visitors:** Any individual who enters a limited-access area who is not an employee of Clean Source Distribution will always be escorted by an authorized employee while within that area.
- **Visitor Log:** A record will be maintained of all authorized individuals who are not employees of Clean Source Distribution who enter the limited-access areas. This log will include the individual's name, the company they work for (if applicable), the reason for entry, the date, and the times of entry and exit. These records will be made available to cannabis licensing officials immediately upon request.
- **Employee Identification Badges:** All agents, officers, or other persons acting for or employed by Clean Source Distribution will always display a laminated or plastic-coated identification badge issued by the company while engaging in commercial cannabis activity. The identification badge will include "Clean Source Distribution," the state license number, the employee's first name, an employee number exclusively assigned to that employee, and a color photograph of the employee (at least 1 inch wide and 1.5 inches high, clearly showing the full front of the employee's face).
- **Site Activity Information:** We anticipate having approximately 2 employees on-site during operating hours. Deliveries or shipments originating from and/or arriving at the project site are anticipated to occur for one week post harvest(s) and will primarily involve the transport of agricultural supplies and the shipment of harvested cannabis to licensed

Waste Management Plan – Clean Source Distribution (Type 5 Large Outdoor Cultivation, San Benito County)

Introduction and Purpose

Clean Source Distribution will operate a Type 5 Large Outdoor cannabis cultivation site in San Benito County. This Waste Management Plan is a required component of the state license application and is designed to meet California Department of Cannabis Control (DCC) regulations (CCR Title 4, §17223) for cannabis waste management. The plan details how all cultivation-related waste will be handled, stored, and disposed of in a safe, environmentally responsible, and compliant manner..

Cultivation Practices and Materials

Organic-Only Inputs: This facility uses exclusively USDA-approved organic amendments and techniques. No synthetic fertilizers, pesticides, or artificial grow media are utilized in the cultivation process. All nutrients, soil amendments, and pest control methods are organic in nature (e.g. compost teas, cover crops, OMRI-listed inputs), which means no chemical residues enter the waste stream. Because only natural materials are used, no hazardous waste is generated on-site – cannabis plant waste consists solely of organic matter and is classified as organic waste under California regulations. This approach not only supports sustainability but also simplifies waste disposal, as all cultivation discards are biodegradable.

No Plastic or Non-Biodegradable Materials: The cultivation process avoids plastic mulches, synthetic landscape fabric, or other non-biodegradable materials. Weed suppression and soil moisture retention are achieved using organic mulch (such as straw) or living ground covers instead of plastic sheeting. Trellising and plant ties, if used, are from natural or reusable materials. By eliminating plastic waste and non-compostable inputs, the operation ensures that virtually all farm waste can be recycled or composted without introducing persistent pollutants. There will be no disposal of drip-tape, polyfilm, or similar plastics from cultivation activities under normal operations. Any incidental inorganic debris (e.g. packaging from supplies) will be collected and handled separately through standard solid waste or recycling channels, not as cannabis waste.

Scope of Operations (No On-Site Processing)

This cultivation facility is dedicated solely to growing cannabis plants; there is no on-site processing, trimming, drying, or packaging of harvested product. All harvested cannabis is transported off-premises to a licensed processing or distribution facility for further trimming, curing, and packaging. Consequently, the waste streams generated on-site are limited to cultivation-related organic materials only. There are no processing scraps (such as bud trim from manicuring), no packaging waste, and no manufacturing by-products produced at this site. The absence of processing means fewer waste concerns – for example, “failed” or expired manufactured products and spent extraction materials do not exist here.

By limiting activities to cultivation, the primary waste is agricultural plant waste (stalks, leaves, roots, soil). Spoiled or unmarketable plant material (e.g. moldy buds found during cultivation) would be rare and minimal because drying/curing is off-site, but any such material would be handled as cannabis waste. Overall, confining operations to cultivation simplifies waste management and reduces the risk of cross-contamination or complex waste handling that processing facilities face. The sole operator is responsible for all cultivation and waste handling, ensuring consistency and compliance with the plan.

Cannabis Waste Types and Handling Procedures

Types of Cultivation Waste: The following organic wastes are generated during cultivation and harvest:

- Plant trimmings and vegetative matter: Leaves, pruned branches, and other plant trimmings removed during the grow cycle (for canopy management or removal of pest-infested foliage).
- Harvest waste – stalks and root balls: After harvesting the marketable portions of the plants, remaining stalks, stems, and root masses become waste. These are woody but biodegradable.
- Non-viable or culled plants: Any failed clones, diseased plants, or male plants (if any) that are removed and destroyed prior to harvest. This also includes any seedlings that do not survive or plants culled to maintain crop health.
- Spoiled or unsaleable flower material: In the rare case a portion of the crop is deemed unusable (e.g. due to mold or pests) before being sent off-site, that plant material becomes waste. (Since drying and curing occur off-site, such instances on the farm are minimal.)
- Spent growing media (if applicable): The cultivation is in native soil (field planting). There is no rockwool, coco coir, or synthetic soilless media to dispose of. If any potted nursery plants or containers are used briefly, the soil/medium is organic and will be re-used or composted on-site. There are no mineral wool or plastic grow bags requiring special

disposal.

All cannabis plant waste is organic and non-hazardous. In compliance with DCC definitions, plant-based cannabis waste is treated as organic green waste (not chemical waste) . There are no toxic materials (like pesticide concentrates or chemical fertilizer residues) mixed in with the plant waste, due to our organic-only cultivation policy.

Collection and Segregation: Cannabis waste is separated at the point of generation. For example, as plants are pruned in the field, trimmings are gathered in designated containers; after harvest, stalks and root balls are collected from the field. All such waste is consolidated to a single designated waste area on the farm for processing or storage prior to disposal. Non-cannabis trash (e.g. packaging from amendment deliveries, irrigation parts) is kept separate and managed through regular waste/recycling services – it is not mixed with cannabis waste. This segregation ensures that cannabis waste remains uncontaminated by plastics or other refuse, which is important because any cannabis waste destined for composting or recycling must be free of non-compostable contaminants .

Prohibited Disposal Methods: Under no circumstances will cannabis waste be disposed of by burning. Open burning of cannabis plant waste is strictly prohibited by state regulations , and this facility will fully comply with that prohibition. Likewise, cannabis waste will not be dumped or buried in unpermitted areas, and will not be combined with general household/office trash. All disposal will follow the approved methods outlined by DCC and described in this plan.

Secure Waste Storage and Handling

Designated Waste Area: The farm has a designated cannabis waste management area identified in the Cultivation Plan site diagram (e.g. a corner of the field or a composting zone). This area is used for temporary storage, composting, and handling of cannabis waste. It is located in an inaccessible area for the public, well within the property boundaries. If waste is held in containers (bins or totes) prior to processing or removal, those containers will be securely stored in this area. The waste area is on level ground and outside any sensitive environmental zones (e.g. away from creeks or drainage swales, as addressed in the Stormwater section below).

Access Control: All cannabis waste on site is kept in a secured receptacle or secured area with access strictly limited to authorized individuals . The sole operator and any trained employees are the only ones who handle waste or enter the waste area. Public access is absolutely prohibited. If waste is stored in a bin or pile, it is within a fenced cultivation area or otherwise physically secured. While a locked container or enclosure is not explicitly required by DCC, this operation will employ locks or fencing as appropriate to ensure security and prevent scavenging or tampering. For example, if using a waste dumpster or compost bin, it will remain in a gated area or have a lockable lid to deter any unauthorized access.

Safe Handling and Odor/Pest Control: Waste handling will occur promptly and safely. Plant material can begin decomposing quickly, so trimmings and culls are processed or moved to the compost area on the same day they are generated whenever feasible. This prevents large accumulations of rotting material that could attract pests (flies, rodents) or produce odors. The waste area and containers will be maintained clean to avoid nuisances. Any odor from composting will be managed by proper aeration and mixing of the compost pile; if necessary, covers will be used to control odors and access by wildlife or insects. Workers handling waste will follow hygiene protocols (such as wearing gloves and washing hands after) to maintain sanitation and avoid spreading any plant diseases. All tools or equipment used in waste handling (pruners, bins, shovels) will be cleaned regularly.

Timely Removal: Cannabis waste will not be allowed to accumulate on the property for extended periods. Timely removal or processing is a key part of this plan. After each major cultivation activity (e.g. post-harvest cleanup, or periodic pruning), the resulting waste will be either incorporated into the soil promptly or prepared for off-site disposal within a reasonable timeframe (generally no more than a few days to a couple of weeks, depending on volume and weather). If utilizing on-site composting, plant material will be added to active compost piles immediately. If waste is destined for off-site haul, it will be stored securely and picked up or delivered to the facility at the next available opportunity (e.g. scheduled green waste pickup or the next trip to the composting facility). This preventative approach ensures that large stockpiles of cannabis waste do not sit on the farm for long durations, thereby reducing risk of odor, pest infestation, or any potential for diversion.

Waste Disposal Methods (DCC-Approved)

Pursuant to DCC regulations, a cannabis cultivator must identify and use one or more approved methods for disposing of cannabis waste. Clean Source Distribution has selected two compliant disposal methods for managing organic cannabis waste. These methods are consistent with CCR Title 4 §17223 and ensure all plant waste is treated or disposed of in an approved manner. The farm will utilize a combination of on-site organic waste recycling and off-site disposal at an authorized facility as described below. Each method will be implemented in a manner that prevents any cannabis waste from being diverted to unauthorized use and complies with state and local waste handling laws.

1. **On-Site Composting & Nutrient Recycling (Tilling into Soil):** The primary disposal method is to compost and recycle cannabis plant waste on-site by incorporating it back into the agricultural land. Cannabis waste is essentially organic green waste, which can be safely composted or tilled into the soil to enrich the fields. Small branches, leaves, and other soft plant material will be added to our on-site composting system. Large stalks and root balls may be chipped or cut up to facilitate decomposition, then mixed into compost piles or directly tilled into fallow sections of the field after harvest. By reintroducing composted cannabis biomass into the soil, we improve soil organic matter and nutrients (a form of natural fertilizer) while disposing of the waste in a productive manner. This practice aligns with DCC's allowable methods (on-premises composting and tilling directly into

agricultural land are explicitly permitted).

Implementation: A designated composting area is maintained on the farm for this purpose (marked on the site plan as “compost area”). Plant waste is layered with other compostable farm materials (e.g. straw, non-cannabis green waste) to aid decomposition. The compost pile is managed (periodically turned for aeration and monitored for proper moisture) to ensure thorough breakdown of cannabis residues. Within a suitable timeframe (often a few months), the composted material is stable and can be spread onto cultivation fields as a soil amendment. Alternatively, instead of a separate compost pile, waste may be immediately spread and tilled into fields after harvest — chopping the plant matter finely and disking it into the soil, where it will decay in place. In both cases, the cannabis waste becomes unrecognizable and biologically transformed, eliminating any potential for diversion or misuse. On-site composting is done in compliance with CalRecycle regulations and thresholds (the volume of compost will remain within limits that do not require a full compost facility permit, e.g. under 750 sq. ft. active compost at a time, as applicable). By utilizing on-site nutrient recycling, the farm minimizes external waste hauling and closes the loop by returning organics to the land.

2. Off-Site Disposal at Approved Green Waste Facility: As a secondary or supplemental method, the licensee will dispose of cannabis waste by hauling it to a licensed off-site organics processing facility. California cannabis regulations allow cultivators to self-haul or contract for disposal of cannabis waste at permitted sites such as composting facilities, transfer stations, or landfills that accept organic waste . In our case, any cannabis waste that is not composted on-site (for example, a surplus of material beyond what can be readily composted, or woody stalks that we choose not to till in) will be transported to a state-authorized green waste or composting facility. We have two options for off-site disposal:
 - Licensed Waste Hauler Service: We may use a local agency franchised waste hauler or a private waste hauling company permitted to collect organic waste in San Benito County . The hauler would provide a dedicated green waste dumpster or bins on-site, and pick up cannabis plant waste on a scheduled basis (e.g. after harvest). The waste hauler must be officially authorized to haul in the jurisdiction . All cannabis waste given to the hauler will be rendered as ordinary green waste (e.g. loose or in paper bags, never in plastic bags to comply with compost facility rules). The hauler will transport the material to an appropriate manned, fully-permitted composting facility or transfer station that accepts cannabis plant material for composting . We will ensure any contracted hauler provides documentation of proper disposal (see Recordkeeping below).
 - Self-Haul to Composting Facility: Alternatively, the sole operator (as a licensed cultivator) can self-transport the cannabis waste directly to an approved disposal site . This might be done if volumes are small or timing is urgent. Acceptable

facilities include a manned and permitted green waste composting facility, a chip-and-grind facility, or a transfer/processing station that will process the material into compost . Prior to transport, the waste will be secured (tarp truck or contained bins) to prevent loss during transit . Upon arriving, we will notify the facility that the load is cannabis plant waste (which by law is equivalent to green waste) and ensure they remove any identifying packaging (though in our case there is none) and mix/compost it with other organic material. Facilities typically charge a fee per weight or volume (at yard debris rates) and provide a receipt. We have identified [Example] Green Waste Compost Facility (permitted by CalRecycle) within reasonable distance that accepts yard trimmings including cannabis. If using self-haul, the operator will obtain a weight ticket or disposal receipt from the facility for recordkeeping.

3. Both off-site options are fully compliant with DCC rules, which explicitly list collection by a local authorized waste hauler and self-haul to permitted facilities among the allowed cannabis waste disposal methods . By utilizing a licensed composting facility, we ensure the plant waste is ultimately composted in a controlled, regulatory-compliant environment. Off-site disposal will typically be used in conjunction with on-site composting – for example, after a large harvest, we might compost a portion on-site and send the excess to the commercial facility. This two-pronged approach guarantees that all cannabis waste is disposed of through legal and environmentally sound channels either on the farm or at an external facility.

General Solid Waste and Personal Waste Management

General Solid Waste (Trash and Recycling): Any non-cannabis solid waste generated on-site—including general trash, staff break area waste, packaging from agricultural supplies, and office waste—is managed separately from cannabis waste. This refuse will be collected in standard, secure trash and recycling receptacles located away from the designated cannabis waste area. General solid waste will be routinely collected by a franchised local municipal waste hauler (or hauled to a local transfer station) to prevent overflow, odors, or pest attraction. Recyclable materials will be separated where applicable. Under no circumstances will any cannabis material be disposed of in these general solid waste or recycling containers.

Personal Waste and Sanitation (Porta-Potties): To manage human waste and ensure proper sanitation for all staff, visitors, and operators, portable restroom facilities (porta-potties) will be utilized on-site. These facilities will be situated in designated staging or break areas, safely distanced from active cultivation zones, water sources, and cannabis waste areas to prevent any risk of cross-contamination. A licensed portable sanitation company will be contracted to deliver, regularly service, clean, and pump the porta-potties. Dedicated handwashing stations equipped with fresh water, soap, and paper towels will be provided directly adjacent to the porta-potties to maintain strict hygiene protocols before returning to cultivation areas. All greywater and waste collected from these units will be exclusively handled and hauled off-site

by the contracted sanitation company for legal disposal at an approved wastewater treatment facility, in full compliance with local health and sanitation ordinances.

Stormwater and Environmental Protection Measures

Preventing stormwater contamination is an important aspect of this waste management plan. Even organic waste, if mismanaged, can leach nutrients or sediments into waterways during rain events. We implement the following Best Management Practices (BMPs) to ensure that composting activities and waste storage do not impact soil or water quality off-site:

- **Location of Waste Piles:** All compost piles or stored organic waste are located away from any creeks, drainage ditches, or stormwater runoff pathways. In accordance with agricultural BMPs, composting areas are sited outside of any riparian buffer zones or flood-prone areas . We maintain a substantial setback (well over 100 feet) from the nearest surface water body for any waste handling area. This distance, coupled with vegetative buffer strips on the property, helps filter out any potential contaminants before water leaves the site.
- **Runoff Controls:** The composting/waste area is engineered to prevent runoff. We have installed perimeter controls (earthen berms and straw wattles) around the compost pile to contain any runoff during heavy rains . These physical barriers direct stormwater around – rather than through – the waste area, preventing nutrient-rich leachate from escaping. The ground in the waste area is kept covered with absorbent carbon material (like straw or wood chips) to soak up liquids and further filter runoff. Additionally, the farm maintains gentle grading to ensure that any water that does contact composted material infiltrates into soil on-site rather than flowing off-site.
- **Covering Waste Materials:** Prior to any forecasted rain, and throughout the winter rainy season, compost piles or stockpiled plant waste are covered with tarps or impermeable sheeting . This prevents rainwater from percolating through the compost and creating leachate or nutrient runoff. By keeping the piles covered, we also regulate moisture in the compost (preventing it from becoming waterlogged) and avoid erosive runoff. The covers are secured so they won't blow off in wind. We implement this practice by autumn (before fall rains begin) and continue it until the dry season.
- **Soil and Nutrient Management:** Used soil or growth media, if any is ever removed from pots or planting areas, will be handled in a manner to prevent leaching. For instance, if soil from container plants needs disposal, it will either be re-used in beds or spread on stable ground and vegetated promptly, or kept in covered, watertight containers until it can be reused . This prevents loose soil (with residual nutrients) from washing into waterways. Fertilizers and amendments are stored securely per regulations (in covered

areas, on pallets) so that raw nutrients are never exposed to stormwater .

- Erosion Control: The cultivation site implements broader erosion control BMPs to protect water quality. These include maintaining vegetative cover on unused portions of the field, applying straw mulch on exposed soil during rainy periods, and avoiding field work during heavy rains. By controlling erosion, we also prevent any compost material or organic matter from being carried off-site by sediment transport. A vegetated buffer exists at the downslope end of the cultivation area to act as a filter strip for any diffuse runoff .
- Monitoring: The operator will regularly inspect the waste management area, especially before and after storms, to ensure all protections are intact (tarps secure, berms/wattles in place) and to check for any signs of runoff leaving the compost area. If any issue is observed (e.g. water pooling or breaching a berm), immediate corrective action will be taken (such as enhancing the berm or adding additional straw wattles). These inspections and maintenance of BMPs are part of our standard operating procedures, in line with state Water Board guidance that sites must routinely check and maintain BMPs .

By following these practices, the facility upholds a high standard of environmental stewardship. We are committed to preventing any discharge of waste or nutrients from cannabis cultivation into storm drains or natural waterways. This not only meets the requirements of our DCC license and the State Water Resources Control Board Cannabis Policy, but also protects the local environment in San Benito County from pollution.

Recordkeeping and Compliance

Clean Source Distribution will maintain strict records and logs to demonstrate compliance with this Waste Management Plan and DCC regulations:

- Waste Log and Track-and-Trace: All cannabis waste generated will be logged in the state Track-and-Trace system (METRC) as required. Each destruction or disposal event (whether on-site compost or off-site removal) will be entered with the weight of waste and method of disposal, consistent with DCC reporting rules . This provides an auditable trail of all biomass removed from inventory. Internally, the operator will also keep a waste log noting dates, approximate volumes, and disposition (e.g. “July 30 – 50 lbs stems/leaves composted on-site” or “Oct 15 – 200 lbs stalks hauled to X Compost Facility”).
- Off-Site Hauling Receipts: For any waste transported off-site, we will obtain and retain documentation as proof of proper disposal. If using a waste hauler pickup service, we will secure a receipt or service manifest from the hauler confirming the pickup of cannabis waste on certain dates . This typically includes the hauler’s name, business,

contact information, date, and material type/quantity. If self-hauling to a facility, we will obtain a weight ticket or disposal receipt from the facility scale-house. These documents will be filed and kept for at least the minimum period required by regulations (usually 2-3 years), and will be readily available to inspectors. DCC regulations empower the Department to request waste disposal records at any time , and our organization will be able to produce complete records upon request.

- **Waste Management Plan Updates:** This plan will be kept up-to-date. If any changes to waste procedures are needed (for example, adding a new disposal method or changing the compost area location), the plan will be amended and submitted to DCC for approval as required. The operator will review the plan annually to ensure it remains compliant with any new regulations or site practices.
- **Staff Training and SOPs:** All employees hired will be trained on the waste handling procedures described in this plan. Standard Operating Procedures (SOPs) will be used to instruct workers on how to collect plant waste, where to put it, how to secure it, and the approved disposal methods. Emphasis will be placed on security and regulatory compliance – for instance, employees will be informed that cannabis waste must stay within the secured area and never be taken off-site except to an approved facility by authorized persons. Training will also cover safety and sanitation when handling waste (to prevent spread of any plant disease and to ensure personal hygiene). Records of training sessions will be kept in the farm’s compliance binder.
- **Regulatory Inspections:** We acknowledge that as part of maintaining our cultivation license, DCC inspectors or other agencies may inspect our premises and review waste management practices. We are prepared for inspections with clearly marked waste areas, organized records, and knowledgeable staff. The existence of this plan and adherence to it demonstrates our proactive compliance. Any observed deficiency (e.g. an insecure waste bin) will be corrected immediately, and we will fully cooperate with regulators to address any concerns. By strictly following this plan, we aim to exceed the minimum regulatory requirements and serve as a model for responsible cannabis cultivation waste management.

This Waste Management Plan is tailored to meet DCC’s state license application standards and demonstrates our commitment to compliance, sustainability, and public safety. By implementing the practices outlined above, Clean Source Distribution will protect the environment, prevent diversion, and maintain full adherence to California’s cannabis waste regulations. We are confident that this plan satisfies the requirements for a Type 5 Large Outdoor cultivation license and will be diligently executed as an integral part of our cultivation operation . All cannabis waste will be handled “from seed to soil” responsibly, ensuring a clean and compliant operation now and into the future.

Clean Source Distribution - Water Supply and Quality Plan (BMOP Section D No. 7)

Objective: To ensure a reliable and sufficient water supply of appropriate quality for cannabis cultivation at the Clean Source Distribution outdoor site, meeting the requirements of BMOP Section D No. 7.

Plan:

This plan outlines the key steps and considerations for managing our water supply and quality.

1. Water Source Identification & Assessment:

- **Action:** Clearly identify all water sources intended for cannabis cultivation (e.g., well water, surface water, municipal supply).
- **Responsibility:** Site Manager, Senior Cultivator
- **Timeline:** Within 1 week of operational start.
- **Outcome:** Documented list of all water sources and their potential yield/capacity.

2. Water Quality Testing:

- **Action:** Conduct initial testing of all identified water sources to establish baseline water quality parameters relevant to cannabis cultivation (e.g., pH, EC, heavy metals, microbial contaminants).
- **Responsibility:** Third-party lab.
- **Timeline:** Prior to the first irrigation of cannabis plants.
- **Outcome:** Laboratory reports detailing the water quality of each source.

3. Water Storage & Delivery System:

- **Action:** Describe the water storage infrastructure (e.g., tanks, ponds) and the irrigation system (e.g., drip irrigation, emitters). Ensure the system is designed to deliver water efficiently and minimize waste.
- **Responsibility:** Site Manager
- **Timeline:** Prior to the first irrigation of cannabis plants.
- **Outcome:** Diagram or description of the water storage and delivery system.

4. Ongoing Water Quality Monitoring:

- **Action:** Establish a schedule for regular water quality monitoring based on the initial testing results and the potential risks associated with each water source. This may

involve in-house testing for basic parameters (pH, EC) and periodic lab testing for more comprehensive analysis.

- **Responsibility:** Senior Cultivator
- **Timeline:** Ongoing throughout the cultivation cycle (frequency to be determined based on initial results and source).
- **Outcome:** Log of water quality testing dates and results.

5. Water Treatment (If Necessary):

- **Action:** If water quality testing reveals parameters outside the acceptable range for cannabis cultivation, develop and implement a water treatment plan. This may involve filtration, pH adjustment, nutrient balancing, or other appropriate methods.
- **Responsibility:** Senior Cultivator, potentially a water treatment specialist.
- **Timeline:** As needed, based on water quality testing results.
- **Outcome:** Documented water treatment plan and records of any treatment applied.

6. Record Keeping:

- **Action:** Maintain detailed records of all water sources, water quality testing results, water treatment procedures (if any), and irrigation schedules.
- **Responsibility:** Designated cultivation staff, Site Manager.
- **Timeline:** Ongoing throughout the cultivation cycle.
- **Outcome:** Organized and readily accessible water management records.

7. Contingency Planning:

- **Action:** Develop a contingency plan to address potential water supply disruptions (e.g., well failure, drought conditions). This may include identifying alternative water sources or implementing water conservation measures.
- **Responsibility:** Site Manager, Operations Manager.
- **Timeline:** Within 2 weeks of operational start.
- **Outcome:** Documented water supply contingency plan.

Weekly Outdoor Cannabis Pest Control Inspection Plan

This plan outlines the steps for conducting a weekly pest and disease inspection on the outdoor cannabis cultivation. Consistent and thorough inspections are crucial for early detection and effective management of potential issues, helping you maintain plant health and compliance.

Frequency: Weekly

Materials Needed:

- the pest control inspection [form](#)
- Pen or digital device to fill out the form.
- Magnifying glass (optional, but highly recommended for small pests).
- Gloves (optional).
- Small bags or containers for collecting samples (if needed for identification).
- Camera (optional, for documenting findings).

Inspection Steps:

Follow these steps for each designated area of the cultivation:

Step 1: Preparation and General Information

- Choose a consistent day and time each week for the inspection.
- Go to the specific area of the cultivation you will be inspecting.
- Fill out the **General Information** section of the form:
 - **Date:** Record the date of the inspection.
 - **Time:** Note the start time of the inspection.
 - **Inspector Name:** Write the name or the name of the person conducting the inspection.
 - **Location (Specific Area):** Clearly identify the section or area of the cultivation being inspected (e.g., "Field 1, Rows A-J", "North Block", "Mother Plant Area").

Step 2: Overall Plant Health Assessment

- Walk through the designated inspection area.
- Observe the plants from a distance first. Look for any plants that stand out or look different from the others.
- Check for general signs of plant stress, such as:
 - **Discoloration:** Yellowing (chlorosis), browning, purpling, or unusual spots on leaves.
 - **Wilting:** Drooping leaves or stems when the plant should be turgid.
 - **Abnormal Growth:** Stunted growth, deformed leaves, or unusual branching patterns.
- Note any areas or specific plants that appear unhealthy in the **Observations/Notes** section.

Step 3: Detailed Pest and Disease Inspection

- Approach individual plants or small groups of plants for closer inspection. Focus on plants

that looked unhealthy in Step 2, but also inspect healthy-looking plants randomly.

- Systematically check different parts of the plants as indicated in the form:
 - **Undersides of Leaves:** This is where many pests like spider mites, aphids, and whiteflies hide. Look for small dots, webbing, or insects themselves.
 - **Tops of Leaves:** Look for discoloration patterns, spots, or signs of leaf miners (trails within the leaf).
 - **Stems and Branches:** Check for aphids, scale insects, or other stem-boring pests.
 - **New Growth:** Tender new leaves and shoots are often targeted by pests like aphids and thrips. Look for distortion, discoloration, or small insects.
 - **Flowers/Buds:** Carefully inspect developing or mature buds for signs of bud rot (gray mold), caterpillars, or other pests hiding within.
 - **Soil Surface/Base of Plant:** Look for fungus gnats or other soil-dwelling pests.
- Use the magnifying glass to get a closer look at any suspicious findings.
- For each pest and disease listed in the form (Aphids, Spider Mites, Whiteflies, Thrips, Fungus Gnats, Caterpillars/Worms, Leaf Miners, Powdery Mildew, Downy Mildew, Bud Rot, Leaf Spot), actively look for signs and indicate their **Presence** (Yes/No) on the form.
- If you select "Other" for pests or diseases, provide a brief **description** in the designated field or in the **Observations/Notes** section.

Step 4: Beneficial Organism Check

- While inspecting for pests, also keep an eye out for beneficial insects or organisms.
- Look for ladybugs, lacewings, predatory mites, praying mantises, or signs of their activity.
- Indicate if **Beneficial Insects/Organisms** were observed on the form.

Step 5: Environmental Assessment

- Note the general **Environmental Conditions** at the time of inspection.
- Record the **Temperature** and **Humidity** if you have a way to measure them in the field.
- Note any recent **Weather** events that could impact pest or disease presence (e.g., recent rain, strong winds, heatwave).

Step 6: Record Observations and Actions

- Use the **Observations/Notes** section to document any specific findings in more detail. Include:
 - Which specific plants or areas are affected.
 - The severity of the infestation or disease.
 - Any patterns you notice (e.g., issues concentrated in one area).
 - Any other relevant observations about the plants or environment.
- In the **Action Taken/Recommendations** section, describe any immediate steps you took (e.g., removed affected leaves, released beneficials in a specific spot) or recommend actions that need to be taken (e.g. adjust watering, scout a particular area more frequently).

CANNABIS BUSINESS PERMIT

Legal Business Name

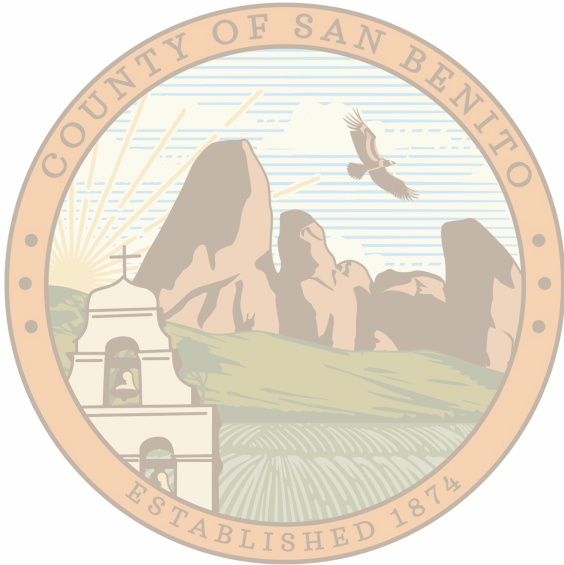
Clean Source Distribution, LLC.

Premise APNs

013-040-025

Premise Address

0 Frazier Lake Road, Hollister,
CA 95023



Valid

4/3/2026 – 4/3/2027

Permit ID

35-2025-0003

Permit Type

PLN250047 - Outdoor
Cultivation of 96.6 acres of
canopy on 154.5 of active
farming area

NON-TRANSFERABLE

POST IN PUBLIC VIEW

*Note: this business permit does not grant a San Benito County Business License. A business license will be required as condition of the use permit.