

October 13, 2022

RE: APP#10656, APN#208-221-014 Environmental Superiority Analysis

Dear Mr. Santos,

This letter is in response to Department Policy Statement No. 16-002, which states, "If a workable alternative cultivation site exists on a parcel and its relocation will bring the cultivation into compliance with performance standards of the CMMLUO, this approach could meet the objectives of the CMMLUO provided it is the environmentally superior option."

In the report dated, April 21, 2021, Pacific Watershed Associates identified a baseline historic cultivation area of 3,500 sq ft. This site is located within the edge of the SMA for the Mad River and is accessed by a dirt road. The site is over 400 ft away from the main cultivation activity areas on the property. This site was developed in approximately 2016 and was abandoned by the previous owner.

The relocation area is more environmentally desirable due to the increased distance from the Mad River (an additional 400ft) and further concentrates the cultivation activities in the area adjacent to recent restoration stabilization work under the approved LSAA. The concentration of cultivation sites from multiple locations to a single location along an existing road will reduce the projects footprint within the property. The road adjacent to the relocation site has been developed to appropriate standards as set forth by CDFW and the SWRCB. Additionally, the control of potential discharges and site monitoring are greatly enhanced by the relocation. The consolidation of cultivation from the historically remote area to one location that is already disturbed by proximity to an existing road surface will benefit wildlife that may potentially occur within property boundaries. Minimizing risk by moving the site not only results in environmental superiority, but also saves time, money and resources from preparing additional technical reports.

Finally, the relocation site is within the scope of the SMA prepared by PWA and will enhance monitoring and oversight efficiencies for the life of the project.

Sincerely,



Nathan Whittington