ATTACHMENT 1B

Cultivation and Operations Plan

EARTHGREEN, LLC

Cultivation and Operations Manual
Humboldt County, CA

Existing and Proposed New
Commercial Cannabis
Cultivation Facilities

JANUARY 2022

PREPARED FOR:

EARTHGREEN, LLC
APN No. 217-032-013-000

Existing with Proposed New
Commercial Cannabis Cultivation Facility

LEAD AGENCY:

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FEBRUARY 2022

OPERATIONS MANUAL

EARTHGREEN, LLC

TABLE OF CONTENTS

1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

EARTHGREEN, LLC is proposing to permit existing cannabis cultivation activities in accordance with the County of Humboldt's Commercial Medical Marijuana Land Use Ordinance No. 2559 (CMMLUO).

The project is seeking a one (1) Conditional Use Permit for 43,560 SF of Outdoor Cultivation and one (1) Special Permit for a Wholesale Nursery.

Water for cultivation is sourced from an on site well, and stored in existing 40,000 gallons of hard tank storage, and an additional proposed 40,000 gallons of hard tank storage. Final Processing and Packaging is performed off site. Power source is solar with a generator backup.

The project includes the permitting of existing and proposed facilities appurtenant to the cultivation, including hoophouses and a building used for Drying cannabis , Harvest Storage and Processing.

1.2. SITE DESCRIPTION

The project is located in Humboldt County, in the Blocksburg area, on the east side of Alderpoint Road, approximately 1.7 miles north from the intersection of Gold Ridge Lane and Alderpoint Road, on the property known to be in Section 15 and 22 of Township 01 South, Range 04 East, Humboldt Base & Meridian. The subject parcel is approximately 178 acres in the Larabee Creek sub-watershed of the Eel River watershed and located on a mixture of forest and grassland. Approximately 38 acres is grassland or developed areas, the rest is forested. The elevation ranges from 1360 feet to 1800 feet and the residence and cultivation area occupy the eastern central portion of the parcel on a large naturally low gradient area, with steeper terrain upslope and downslope.

The property is developed with one existing residence, shop building, harvest storage shed, metal container, and a shed.

1.3. LAND USE

The subject property has a General Plan designation of Agricultural Grazing (AG) and Timberland (T) as identified by the Humboldt County General Plan and is zoned Timberland Production Zone (TPZ), Agricultural Exclusive (AE) and Unclassified (U) . Land uses surrounding the parcel consist primarily of Agricultural Grazing (AG) and Timberland (T) of residential, timber and agriculture, and have zonings of Unclassified (U), Timber Production Zone (TPZ) and Agricultural Exclusive (AE).

1.4. STATE AND LOCAL COMPLIANCE

1.4.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

EARTHGREEN, LLC holds two (2) current licenses with the California Department of Cannabis Control (DCC).

CCL20-0002902 - Small Mixed Light T-1

CCL20-0002903 - Small Outdoor

EARTHGREEN, LLC will apply to the DCC after Local Permitting is approved for an additional Medium Outdoor license and Wholesale Nursery license.

1.4.2. STATE WATER RESOURCES CONTROL BOARD

EARTHGREEN, LLC is registered as a Tier 2 - Low Risk site with the SWRCB under the Cannabis Cultivation General Order (Order No. WQ 2019-0001-DWQ) *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for the Discharges of Waste associated with Cannabis Cultivation.* [App No.420397 WDID:1_12CC420397]

1.4.3. CAL-FIRE

The subject property is located within a State Responsibility Area (SRA) for fire protection. Several improvements are proposed in order to meet SRA requirements, including designating a fire turn- around and pull-out area for emergency vehicles, and management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirements from property lines.

1.4.4. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

A Lake and Streambed Alteration Agreement (LSAA) from the Department of Fish and Wildlife (DFW) has been obtained for an onsite pond not used for cannabis cultivation.
NOTIFICATION #: 1600-2020-0038-R1_HUM.

1.4.5. HUMBOLDT COUNTY PLANNING AND BUILDING DEPARTMENT

All necessary building permits will be obtained from the Humboldt County Building Department for all existing and proposed structures and supporting infrastructure upon approval of the proposed Cultivation for a Zoning Clearance Certificate, in accordance with the Humboldt County Planning Departments *Commercial Medical Marijuana Land Use Ordinance* (CMMLUO).

1.4.6. CULTURAL RESOURCES

A cultural resource study was performed in January 2020 by Nick Angeloff and associates.

The survey was conducted by Archaeological Technicians Abby Barrios, BA, Michael McDermott, BA, Walter Tovar-Sandoval, BA, and Elijah Sanderson under the direction of Nick Angeloff, MA, Principal Investigator in January of 2020. The survey covered approximately 58-acres of the 185-acre parcel. Visibility was generally good, roughly 50-75% in most areas. Systematic shovel probes were employed at 15-meter intervals where visibility was more obscured. Additionally, a 600-foot buffer was surveyed around all project areas, excluding any landforms that exceeded a 30% grade or more. Below is an excerpt from the study:

> **1.0 SUMMARY OF FINDINGS**
>
> This report is the result of an archaeological survey of Assessor's Parcel Number: 217-032-013, totaling 185-acres in Blocksburg, Humboldt County, California. The properties are the subject of a cannabis permitting project, Humboldt County CMMLUO application numbers: 11850. No significant prehistoric or historic cultural resources were found as a result of this investigation.

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

2. CULTIVATION AND PROCESSING PLAN

2.1 PROPAGATION AND INITIAL TRANSPLANT

Juvenile plants are propagated on site from seeds and 'mother plants' that demonstrate the desired genetics for the specific cannabis strain. Mother plants will remain in the vegetative stage solely for propagation during the early spring and summer. Some mother plants with strong genetics will be brought to flower for seed harvesting only. Cuttings are sampled from the mother plants and rooted into a growing medium, typically oasis cube trays, to produce 'clones.' The rooted clones are placed into the nursery, and after 3 weeks they are transplanted directly into one (1) gallon plastic containers (see Appendix A for nursery locations). The juvenile plants are irrigated using hand watering methods. After 3 more weeks the clones are then transplanted directly into raised beds with a soil and perlite medium, in a hoophouse where they continue their 'vegetative' cycle.

The propagation will take place in designated Immature Plant Hoophouses. There is a mom area, and a cloning area within the hoophouse. All mom's are designated in METRC track and trace, while the cuttings are grouped in immature plant lots of 100 until they are flowering, in which they will each be assigned an individual tag.

2.2 CULTIVATION PLAN AND SCHEDULE

The outdoor cultivation will occur on 3 graded flats within hoophouses, Cultivation hoop houses are made from pvc construction on grade.

Full Sun Plants will be cultivated in 28 raised beds for a total of 29,200 SF.

Light Deprivation Plants will be cultivated in 6 hoophouses for a total of 9,024 SF. Plants are grown directly in soil within contained raised beds. The following hoophouses will utilize light deprivation methods to produce up to two (3) flowering cycles per year.

Immature Plants for Cultivation will be cultivated in two greenhouses for a total of 4,320 SF.

Wholesale Nursery Plants will be cultivated in two greenhouses for a total of 5,600 SF.

Light Deprivation Cultivation - CANOPY AREA = 9,024 SF

Area #1 - CANOPY AREA = 3,264 SF

(E) ML # 1 : 16' X 102' = 1,632 SF

(E) ML # 2 : 16' X 102' = 1,632 SF

Area #2 - CANOPY AREA = 5,760 SF

(E) ML 3: 20' X 96' = 1,920 SF

(E) ML 4: 20' X 96' = 1,920 SF

(E) ML 5: 20' X 96' = 1,920 SF

Full Sun Cultivation CANOPY AREA = 29,200 SF

Area #3 - CANOPY AREA = 9,200 SF

(E) OD # 1 - # 8 : (8 BEDS) @ 10' X 115 ' = 1,150 SF

Area #1 - CANOPY AREA = 20,000 SF

(E) OD # 9 - # 28 : (20 BEDS) @ 10' X 100 ' = 1,000 SF

Immature Plant PROPAGATION AREA = 4,320 SF

Area #1 - IMMATURE PLANT AREA = 4,320 SF

(E) NURSERY # A: 30' X 72' = 2,160 SF

(E) NURSERY # B: 30' X 72' = 2,160 SF

Wholesale Nursery PROPAGATION AREA = 5,600 SF

Area #2 - IMMATURE PLANT AREA = 5,600 SF

(E) NURSERY # C: 30' X 96' = 2,800 SF

(E) NURSERY # D: 30' X 96' = 2,800 SF

TOTAL FULL SUN = 29,200 SF

TOTAL LIGHT DEPRIVATION = 9,024 SF

TOTAL ACCESSORY NURSERY = 4,320 SF

TOTAL CULTIVATION AREA = 42,544 SF

SCHEDULE OF ACTIVITIES

March - Start seeds and fill water storage, work on compost operations
April- Start repotting into 1 gals first and then into 3 gals, make soil.
May - Repot into 5 gals pots and prep all outdoor garden beds, make soil
June - Plant all plants, mulch, and irrigated
July - Set up all trellising systems and top dress
August - Feed with homemade teas
September - Start harvesting early stuff, get all areas ready to process
October - Harvest everything, clean up gardens
November - Clean processing areas

2.3 IRRIGATION PLAN AND SCHEDULE

Irrigation and fertigation of plants occurs using spray irrigation and hand watering methods. EARTHGREEN, LLC maintains that irrigation and fertigation is more efficiently managed via combining spray irrigation and hand watering, allowing for daily inspection of each plant by the cultivator and tailored irrigation and nutrient application depending on the needs of each individual plant. The monthly Cultivation Schedule in Appendix C details the irrigation activities associated with all cultivation.

2.4 HARVESTING AND DRYING

2.3.1 HARVESTING

Plantings that are ready for either partial plant harvest (manicure) or whole plant harvest are to be cut / manicured, are transferred to the processing facility where they are weighed wet and recorded as Harvest Batches for METRC compliance.

2.3.2 DRYING, CURING & GRADING

The Harvest Batches are moved into the drying room, grouped according to Batch with their flowering branches removed and suspended. The drying room is equipped with ventilation fans and dehumidifiers. The drying process takes approximately one week.

DRY HARVEST STORAGE - Drying will occur in existing drying sheds as denoted on the Plot Plan.

2.3.3 BUCKING

Once the Harvest Batch has dried, the dried flower is then bucked into manageable buds, weighed and packed in plastic containers with lids and recorded in METRC. These are now identified as a product and get a new Product Tag. Final Products are securely stored until transported to an off-site processing facility until the onsite processing facility construction is completed.

2.5 PROCESSING PLAN

2.5.1 PROCESSING FACILITY

No cannabis will be processed further than drying and bucking down. Final processing and packaging will occur off site . EARTHGREEN, LLC will contract with a licensed off-site processing facility and/or sell bulk cannabis to other commercial cannabis licensees.

2.6. EMPLOYEE PLAN

EARTHGREEN, LLC is an "agricultural employer" as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 (commencing with Section 1140) of Division 2 of the Labor Code), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

2.6.1 STAFFING REQUIREMENTS

EARTHGREEN, LLC is an "agricultural employer" as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 (commencing with Section 1140) of Division 2 of the Labor Code), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

2.6.1.1 JOB DESCRIPTIONS AND EMPLOYEE SUMMARY

Agent in Charge: One (1) person responsible for business oversight and management of the project. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.

Lead Cultivator: One (1) person for oversight and management of the day to day cultivation of commercial cannabis. Responsibilities include, but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization,

pesticide management, and harvest activities. This is a full-time, year-round position.

Seasonal Laborer: Minimally Two (2) and up to Five (5) persons for seasonal labor assistance for cultivation, harvesting, drying and bucking.

2.6.2 EMPLOYEE TRAINING AND SAFETY

On site cultivation, harvesting, drying, bucking and sorting is performed by employees trained on each aspect of the procedure including: cultivation and harvesting techniques and use of pruning tools; proper application and storage of pesticides and fertilizers; All cultivation and processing staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation and drying facilities are limited to authorized and trained staff.

All employees are trained on proper safety procedure including fire safety; use of rubber gloves and respirators; proper hand washing guidelines; and protocol in the event of an emergency. Contact information for the local fire department, CAL FIRE, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted at the employee restroom. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets (MSDS) are kept on site and accessible to employees.

2.6.3 TOILET AND HANDWASHING FACILITIES

The restroom in the residence on site will be available and stocked with. Anti-bacterial Liquid Soap and paper hand towels until installation of porta-toilet including hand washing station.

2.6.4 DRINKING WATER SOURCE

EARTHGREEN, LLC will also provide safe, clean, purified drinking water via store bought individual sealed bottled water bottles as well as an upright office style water cooler. Clean disposable paper cups will be made available to all employees.

2.6.5 ONSITE HOUSING

The existing residence located on site is available for use by the on-site Owner (Agent in Charge, Lead Cultivator). The remainder of seasonal employees live off site and commute daily to the cultivation site.

3. SECURITY PLAN

3.1 FACILITY SECURITY

There is one (1) shared access to the premise parcel and is secured with a locked gate, Then a second access solely to the premise that is also secured with a locked gate. On-Site there are guard dogs. Video Survelliance to be installed in future. Final Product is contained in a cinder block room with a secure steel door.

3.2 HOURS OF OPERATION

Everyday 9am - 6pm

4. ENVIRONMENT

4.1 WATER SOURCE & PROJECT WATER USE

4.1.1 SOURCE

Potable water will be provided via office-type water cooler with bottled water from town.

Water for domestic use is sourced by one (1) onsite permitted wells.

Water for cultivation is sourced from the (1) onsite well.

Appropriate water rights with the State of California Water Resources Control Board have been filed.

4.1.2 USE

The table below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

Estimated water use for cultivation irrigation is 540,000 gallons per year.

Table 3.1: Estimated Annual Irrigation Water Usage

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
5,000	8,400	15,500	22,500	31,000	60,000	155,000	155,000	37,200	37,200	8,400	5,000

4.2 WATER STORAGE

Storage for Cannabis Irrigation is currently contained in eight (8) 4,800-gallon tanks with an additional proposed 40,000 gallons of Hard Plastic Storage Tanks for a total of 78,400 Gallons of storage.

Storage for Domestic Use is currently contained in two (2) 3,000 gallon tanks.

Storage for Fire Use is currently contained in three (3) 3,000-gallon tanks.

Cannabis Use: 78,400 Gallons (E) 38,400 Gallons - (P) 40,000 Gallons)

Domestic Use : 6,000 Gallons

Fire Use : 9,000 Gallons

4.3 SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

EARTHGREEN, LLC, will enroll with the California State Water Resource Control Board (SWRCB) in accordance with the Cannabis Cultivation General Order as a Tier 2 low risk site , and a Site Management Plan (SMP) has developed utilizing best management practices (BMP's) in accordance with the SWRCB's recommendations.

4.3.1 SITE DRAINAGE

Parcel: The sites elevation ranges from 1360 feet to 1800 feet and the residence and cultivation area are located on a large naturally low gradient area, with steeper terrain upslope and downslope.

Cultivation: The cultivation areas are on gentle slopes with grades of less than 8%. The flats are out-sloped with a grade of 1-2%. The outdoor cultivation areas are in natural grassy flats with natural slopes of approximately 2-4% that have not been graded.

Roads: Throughout the site there are approximately 3.75 miles of vehicle-accessible roads, including the primary access road (0.64 miles), cannabis associated roads (1.3 miles) and Legacy Timber Roads (1.81 miles). Cannabis-associated roads include roads that access cultivation sites, water tanks and wells, spoils or compost piles, and storage and drying facilities; these roads have an average width of 10-feet. The main access road and the cannabis cultivation roads are consistent with the guidelines presented in the Handbook for Forest, Ranch, and Rural Roads (PWA, 2015). The legacy timber roads evaluated on May 29, 2019, showed multiple locations in which the road surface had rilling and other signs of erosion; these roads are located north of the cultivation area and not used for cannabis access. Details for corrections, monitoring and maintenance can be found in the Full Site Management Plan on file.

4.3.2 SITE RUNOFF

The existing and proposed hoophouses are located away from riparian zones. Cultivation facilities meet all required setbacks from the nearest water course, providing a sufficient buffer to prevent sediment and nutrient delivery. To further prevent runoff to riparian areas, water conservation and containment measures have been implemented, including the use of hand irrigation to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone.

4.3.3 EROSION CONTROL

EARTHGREEN LLC, will utilize best management practices including but not limited to:

1. Maintenance of roads, including rocking and armoring.
2. Proper management of solid, liquid and cultivation waste Cultivation facilities and spoil stockpiles will meet all required setbacks from riparian and wetland areas.
3. Irrigation and application of fertilizers will be applied at agronomic rates.
4. Regulated products will be safely stored with secondary containment.

4.4 WATERSHED AND HABITAT PROTECTION

Adherence to the proposed best management practices ensures that the watershed and surrounding habitat are protected. The cultivation activities and associated structures meet all required setbacks from the nearest watercourse, providing a suitable buffer between the cultivation operation and habitat. Additionally, site development and maintenance activities utilize BMP's in accordance with the SWRCB's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits.

An Invasive Species Control plan was conducted and no invasive plant or wildlife species were observed.

4.5 MONITORING AND REPORTING

Monitoring will be conducted to confirm the effectiveness of corrected measures listed in the Site Management Plan (SMP) and determine if the site meets all Standard Conditions. Inspections will include photographic documentation of any controllable sediment discharge sites as identified on the site map. Visual inspection will occur at those locations on the site where pollutants or wastes, if uncontained, could be transported into receiving waters, and those locations where runoff from roads or developed areas drains into or

towards surface water. The inspection will also document the progress of any plan element subject to a time schedule, or in the process of being implemented.

Onsite monitoring shall occur:

- Before and after any significant alteration or upgrade to a given stream crossing, road segment, or other controllable sediment discharge site. Inspection should include photographic documentation, with photo records to be kept on site.
- Prior to October 15 and December 15 to evaluate site preparedness for storm events and stormwater runoff.
- Following any rainfall event with an intensity of 3 inches precipitation in 24 hours. Precipitation data can be obtained from the National Weather Service by entering the site zip code at http://www.srh.noaa.gov/forecast.

A Monitoring and Reporting Form (Order No. WQ 2019-0001-DWQ Attachment B) will be submitted upon initial enrollment in the Order (NOI) and then annually by March 1st to the State Water Resource Control Board. The annual report will include data from the monitoring reports.

4.6 ENERGY PLAN

Electricity for cultivation and domestic uses is currently provided by solar panels with back up generators. Applicant intends on a power installment from PG&E once the CMMLUO permit is final.

Use of back up generators are limited to the winter, rainy days, and power outage events, and follows all guidelines set up by Humboldt County and the State of California. All generators are located away from the property line to ensure the noise level does not exceed 60 decibels at the property line. The generators and gasoline fuel are located within a secondary containment trough.

There are a total of one hundred and thirty one (131) solar panels used on the property. Sixteen (16) are used for the house and sheds while the remaining one hundred fifteen (115) are used for cultivation areas to operate high efficiency water pumps, fans and dehumidifiers, via charge charge controllers and batteries link to inverters.

Each panel is 260 watt and the entire system is estimated to produce 33,000 watts of solar energy.

4.7 NOISE CONTROL MEASUREMENTS

The generators will be located in the generator sheds to ensure the noise level does not exceed 50 decibels measured at 100 feet. The generator and diesel fuel are located within a secondary containment trough.

Ventilated enclosures will be used as necessary to mitigate generator noises.

4.8 LIGHT POLLUTION CONTROL MEASURES

String lights are used in the nursery and used in conjunction with black out tarp to ensure the site meets International Dark Sky Standards.

4.9 BEST MANAGEMENT PRACTICES

4.9.1 USE AND STORAGE OF REGULATED PRODUCTS

Best Management Practices (BMP's) are employed when storing, handling, mixing, application and disposal of all fertilizers, pesticides and fungicides. All nutrients, pesticides and fungicides are located in a locked storage room, and contained within water tight, locked and labeled containers in accordance with manufacturer's instruction. Application rates will be tracked and reported with the end of the year monitoring report required in the Site Management Plan (SMP). Employees responsible for application are trained to handle, mix, apply or dispose of pesticides/fungicides with proper hand, eye body and respiratory protection in accordance with the manufacturer's recommendations. See the SMP'S for complete BMP specifications for the use and storage of regulated products.

4.10 FERTILIZERS, PESTICIDES AND FUNGICIDES

Table 3. Fertilizer, Pesticide, Herbicide, and Rodenticide

Product	Delivery	Storage	Use	Disposal
Seaweed Nitrozyme	Pickup Truck	1 and 5-gallon plastic jugs	Soil amendment	Used up and empty containers recycled

4.11 FUELS AND OILS

Table 4. Petroleum Products

Product	Delivery	Storage	Use	Disposal
Gasoline	Pickup Truck	in portable	Small farm equipment	Used on-site
Diesel	Delivery Truck	500 Gallon Tank	Large farm equipment	Used on-site
Motor oil	Pickup Truck	1-quart bottles	all motorized equipment	Eel River Disposal
Propane	Delivery Truck	1,000 Gallon Tank	Domestic/Heating	Used on-site

4.12 WASTE MANAGEMENT PLAN

4.12.1 CULTIVATION WASTE AND SOIL MANAGEMENT

There is an area approximately 75 feet due west of the southwest cultivation hoops for cannabis waste storage. There is a designated area immediately south of the cannabis waste storage area for excess soils and spoils storage. Soils and spoils will be tarped and surrounded with wattles during the rainy season from October 15 through May 15th when not in use.

4.12.2 MATERIALS MANAGEMENT AND WASTE PLAN

Waste bins with lids are kept adjacent to the residence and each cultivation site. They are emptied out the day they are filled up or weekly.

Waste materials are stored in a shed and self-hauled off at least once a month to a licensed waste transfer station.

Trash/refuse is disposed of at the Recology Eel River waste transfer station located at 965 Riverwalk Drive in Fortuna, CA at least once a month.

4.12.3 WASTEWATER MANAGEMENT PLAN

Domestic wastewater is disposed of in a permitted onsite wastewater treatment system in the form of a septic tank and leach lines. There are also rented chemical toilets for employee use and for convenience. The chemical toilets are serviced every two weeks by Six Rivers Portable toilets.

Spray Irrigation and hand watering methods minimize the over-irrigation of plants and subsequent runoff.

4.12.5 STORM-WATER MANAGEMENT PLAN

See appended Site Management Plan and Department of Fish and Wildlife Lake and Streambed Alteration Agreement regarding the sizing of culverts and storm-water discharge best management practices.