# **MERMAID SPRING FARM**

## <u>S</u>tandard

## **O**perating

## **P**rocedures

2021

Owner/contact: Erik Stugard, 707-223-3646

## APN#'S:

PARCEL 1: 216-025-009 [APPS# 11102, CN# CUP16-149] PARCEL 2: 216-025-002 [APPS# 12469, CN# ZCC16-466] PARCEL 3: 216-025-011 [APPS# 12471, CN# CUP16-699]

## **OPERATOR:**

MERMAID SPRING ESTATE, LLC Po Box 942 Garberville, CA, 95542

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## Part 1: Purpose of this COP document

This document is intended as a manual for farm personnel, and provides the basis for farm operations and compliance. This document also provides information to demonstrate compliance with County, State and Federal laws regarding the cultivation and transfer of cannabis and non-manufactured cannabis products to other licensed cannabis businesses.

## Part 2: Farm Review

## 2.1 Mermaid Spring Farm

Our goal at Mermaid Spring Farm (MSF) is to honor and preserve the land while providing premium quality medicine to the patient. Our vision is to create sustainability during the cultivation process. We value our home, Humboldt County, and are committed to excellence as land stewards of our family farm.

MSF is owned and operated by owner Erik Stugard under the LLC, Mermaid Spring Estate. The farm consists of 227 acres on four adjoined parcels, two of which were merged in 1984. All parcels are adjacent, contiguous, and interact as one operation. The property is mostly Douglas-fir timberland and meadows. See permitting goals below for a description of our cultivation areas.

The property is located in Sec 20, T5S, R5E, HB&M, Humboldt County, from the Harris 7.5' USGS Quad Map and is approximately 8.8 miles SWW of Benbow. Access to the property is from US Highway 101 to Alderpoint Rd to Bell Springs Road to a private drive that intersects all four parcels. The parcel boundaries are coterminous with the Mendocino County line. The primary residential address for the project is 8786 Bell Springs Unincorporated, CA 95542.

The property has been inspected for potential and existing erosion sites/pollution sites that have the potential to discharge waste that could affect Waters of the State, and a Water Resource Protection Plan (WRPP) has been developed by Timberland Resource Consultants; 165 South Fortuna Blvd, Fortuna, CA 95540 to mitigate any issues. We also have 1600 Stream Bed Alteration Permit. See our WRPP for more details.

**Please Note:** Some sections of the document are intended to be the guidelines used for future employees if and when they are hired. We intend to hire 1 to 2 employees to help with cultivation during the growing season on all 3 parcels.

## 2.2 - Permitting Goals and Infrastructure per Parcel

Applicant owns three legal parcels, comprising four APNs, as follows:

- Parcel 1: APNs 216-025-009 (116 acres) and 216-025-016 (38 acres) form a single legal parcel comprising 154 acres. Note: A Lot Line Adjustment in 1984 on file with the County merged these APNs into a single parcel.
- Parcel 2: APN 216-025-011 is 58 acres.
- Parcel 3: APN 216-025-002 is 54 acres.

## Parcel 1 (APN's: 216-025-009 and 216-025-016) Use Permit APPS# 11102, CN# CUP16-149

This 154-acre U-AL40 zoned parcel. Total cultivation area existing prior to 2016 as described in the Zoning Clearance Certificate =16,450 square feet. Current Aggregate Outdoor Cultivation on Parcel = 15,365 square feet.

**Relocation:** Policy Statement 16-002 allows for relocation of sites "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."

We have completed the studies to address Policy Statement 16-002 to show that we can cultivate the allowed square footage of 16,450 sq. ft. in a consolidated prime agricultural soils area that will reduce road use, prevent erosion and limit impacts on wildlife. Please see the March 15<sup>th</sup>, 2019 recommendation letter from Timberland Resource Consultants, as well as the biological assessment produced by Wildlife Biologist Brit O'Brien on April 22<sup>nd</sup>, 2019 to describe the justification for relocation. The meadow where this relocated cultivation would occur has been determined by a geologist to consist entirely of prime agricultural soils. Please see Geologic Prime Soils Exploration Letter from Lindberg Geologic Consulting dated January 26<sup>th</sup>, 2017. We plan to complete this relocation without grading or impervious floors so as to preserve the underlying prime agricultural soils.

Two rain-fed ponds on this parcel will provide all water for required for irrigation. Estimated water use is 210,000 gallons annually.

For Curing and Processing for this parcel see Section 5.2.

#### PARCEL 1 INFRASTRUCTURE :

AGGREGATE SQUARE FOOTAGE OF NON-CONTIGUOUS CANOPY AREA: 15,365 SQ FT

#### **GREENHOUSE C1: IMMATURE PLANT AREA**

16' X 68', 1,088 SQ FT TOTAL ANCHORED METAL HOOPS, 4' O.C.

#### **GREENHOUSE C2: IMMATURE PLANT AREA**

16' X 70', 1,120 SQ FT ANCHORED METAL HOOPS, 4' O.C.

FULL TERM OUTDOOR AREA C: 1,600 SQ'

**FULL TERM OUTDOOR AREA D:** (5) BEDS 4' X 65', (1) BED 4' X 60' = 1,540 SQ'

#### LIGHT DEP. GREENHOUSE D:

35' X 73' = 2,555 SQ FT ANCHORED METAL HOOPS, 4' O.C

#### LIGHT DEP GREENHOUSES 1-13: 10,400 SQ FT

(13) 8' X 100' X 7' TALL, 800 SQ FT EACH ANCHORED METAL HOOPS, 4' O.C.

#### CURING, PROCESSING, AND PACKAGING:

"MAIN FACILITY" PRE-FAB 30' X 40' METAL BUILDING, 1200 SQ. FT.

#### SECURE STORAGE OF SOLID WASTE

METAL SHIPPING CONTAINER: 8' X 20', 160 SQ FT

#### COMPOST AREA:

20' X 20', 400 SQ FT

#### **GENERATOR CONTAINER:**

METAL SHIPPING CONTAINER: 8' X 20', 160 SQ FT

#### 12' X 12' SOLAR SHED (BUILT 2010)

W/BATTERIES, 8000 WATT INVERTER

## Parcel 2 (APN 216-025-011): Zoning Clearance Certificate APPS# 12469, CN# ZCC16-466

Total cultivation area existing prior to 2016 as described in the Zoning Clearance Certificate = 4,800 square feet. Applicant is seeking a Zoning Clearance for continued Outdoor Cultivation. Current Cultivation Area E: 2,848 square feet

This 58-acre parcel is zoned U-AL40. It contains one outdoor natural light grow site. The existing site (Cultivation Area E) has been in operation prior to January 1, 2016.

Two rain-fed ponds on APN 216-025-009 will provide all water required for irrigation. Estimated water use = 42,000 gallons annually.

Cultivation Area E also contains a small building that is used for curing of harvested cannabis. For Curing and Processing for this parcel see Section 5.2.

Immature plants are propagated on Parcel 1: 216-025-009 [Apps# 11102, Cn# Cup16-149] in the designated immature plant greenhouses.

#### PARCEL 2 INFRASTRUCTURE:

AGGREGATE SQUARE FOOTAGE OF NON-CONTIGUOUS CANOPY AREA: 3,400 SQ FT

#### LIGHT DEP. AREA E: GREENHOUSE E1: 30' X 92', 2,760 SQ' GREENHOUSE E2: 16' X 40', 640 SQ'

AUXILIARY CURING SHED: 20' X 28', 560 SQ. FT., BUILT 2002

## (5) METAL SHIPPING CONTAINERS: 8' X 20', 160 SQ FT EACH: (A) SECURE CANNABIS STORAGE (B) SECURE STORAGE FOR PESTICIDE AGRICULTURAL CHEMICAL STORAGE

(C)SECURE CANNABIS STORAGE (D)SECURE CANNABIS STORAGE (D)SECURE CANNABIS STORAGE (E) GENERAL SUPPLY STORAGE

## Parcel 3 (APN 216-025-002): Use Permit APPS# 12471, CN# CUP16-699

This 54-acre parcel is zoned U-AL40. It contained outdoor natural light grow sites, F, G & H, prior to January 1, 2016. Total cultivation area existing prior to 2016 as described in the Zoning Clearance Certificate = 13,600 square feet. Current Cultivation Area F/G: 11,660 square feet.

**Relocation:** Cultivation Area H was deemed not suitable for continued operation, due to its proximity to a seasonal watercourse. This site has been retired and fully remediated. We will relocate the square footage previously used at this site to a more suitable unused area on the same parcel, adjoining Cultivation Area F/G, which meets all environmental requirements outlined in Policy Statement 16-002. Please see the March 15<sup>th</sup>, 2019 recommendation letter from Timberland Resource Consultants, as well as the biological assessment produced by Wildlife Biologist Brit O'Brien on April 22<sup>nd</sup>, 2019 to describe the justification for relocation of Area H.

Two rain-fed ponds on APN 216-025-009 (shown on the Property Map for APN 216-025-009) will provide all water for required for irrigation. Estimated water use is 150,000 gallons annually.

Curing for this parcel will occur in the Main Facility Located on APN 216-025-009 or in the Barn structure on this parcel. For Processing for this parcel see Section 5.2.

Immature plants are propagated on Parcel 1: 216-025-009 [Apps# 11102, Cn# Cup16-149] in the designated immature plant greenhouses.

#### PARCEL 3 INFRASTRUCTURE:

AGGREGATE SQUARE FOOTAGE OF NON-CONTIGUOUS CANOPY AREA: 11,660 SQ FT

#### LIGHT DEP AREA F: 5,260 SQ FT TOTAL

GREENHOUSE F1: 35' X 60' = 2,100 SQ FT GREENHOUSE F2: 30' X 72' = 2,160 SQ FT GREENHOUSE F3: 20' X 50' = 1,000 SQ FT

#### FULL TERM OUTDOOR AREA G: 6,400 SQ FT

FENCED AREA G1: 40' X 40' = 1,600 SQ FT FENCED AREA G2: 30' X 80' = 2,400 SQ FT FENCED AREA G3: 40' X 60' = 2,400 SQ FT

#### CURING FACILITY:

BARN - 24' X 34', 816 SQ FT

## Part 3: Environment

## 3.1 Site Drainage & Erosion Control

**Cultivation Legacy & Remediation.** Our crop production land has been farm land for a number of years. There are no concerns about previous land use related to microbial or chemical contamination of crops. There are no feedlots or municipal water treatment facilities adjacent to our property. Crop land is not susceptible to flooding. Legacy damage from logging done on the property prior to current ownership has been inspected by a third party State Water Board representative. Remediation efforts have been determined to limit the sediment discharge risk to the creeks running through the properties. See our WRPP for details.

**Roads.** The majority of roads on the property were constructed in the past for timber harvesting and the rest are associated with homestead land use. The road system is generally well laid out with minimal stream crossings and roads within riparian areas. However, 13 sites were identified as needing repair to existing road surface drainage structures or additional structures installed to prevent the concentration of road surface runoff or erosion of the road surface. Please see our WRPP for location and other details.

All vehicles are instructed to drive at a rate of speed that prevents plumes of dust from contaminating nearby vegetation or waterways, and to avoid tire slippage and excess erosion. Four wheel drive is used in sections that can potentially cause wheel slip. Family members live on or adjacent to the property which limits commuter miles on the main dirt road. Employees, when hired, should be encouraged to carpool to limit the amount of traffic on the road during seasonal peaks. Road discharge issues identified within the WRPP will be implemented as required. Our local road association will be monitoring the road use and repair of the main road, and collecting dues from farms to offset the monitoring costs.

#### Vehicles in the production areas:

- Vehicles are allowed only on the roadways and headlands. All vehicles will be inspected for the following prior to entering the fields:
- interior and exterior cleanliness
- no broken or cracked plastic or glass windows, fixtures, covers, or other parts
- no dripping oil, anti-freeze, or other fluid, petroleum product, or automotive lubricant
- Contamination hazards present including food, pet hair, mold, or other items that could compromise the produce. Inspect vehicle before loading produce.

**Cultivation Areas** The cultivation areas have been inspected as well. The cultivation flats existed prior to current ownership, are minimally sloped, and represent minimal erosion risk to the surrounding watershed. The graded areas have been determined to be stable with well vegetated cut banks and fill slopes.<sup>1</sup>

Cultivation areas in open grasslands contain raised beds upon natural slopes of no greater than 20%. In most cases the cultivation areas do not drain to a watercourse and in all cases no erosion was observed as a result of drainage from the cultivation areas.<sup>2</sup> However, in Cultivation Area E, where a portion of the cultivation area drains to a Class III watercourse via an inboard ditch, a new drainage ditch will be developed to drain water from the cultivation area away from the watercourse.

The cultivation areas are inspected regularly for signs of erosion that would lead to sediment discharge. See the WRPP for more information on the priority and type of triage required. MSF fully intends to work through all triage recommendations contained in the WRPP.

## 3.2 Soils and Spoils

Our soil is alive. We do not intend to let it die or run downslope. We currently have no spoilage. In the event of soil contamination, the spoilage will be dealt with in the manner described in the WRPP.

## 3.3 Water Quality

Our farm is a registered **Tier 2** cultivation site per the California Regional Water Quality Control Board North Coast Region Order No. 2015-0023 Waiver of Waste Discharge Requirements and General Water Quality Certification, **WDID# 1B161035CHUM**. Our Water Resource Protection Plan (WRPP), discharge logs, permits, and site maps are found in the Main Facility. See our WRPP for further details about discharge mitigation and monitoring.

## 3.4 Water Sources

Water on the property is currently derived from two points of diversion and two raincatchment ponds located on the property. We use rainwater captured in the ponds

<sup>&</sup>lt;sup>1</sup> Water Resources Protection Plan WDID#1B161035CHUM, Timberland Resource Consultants, October 26, 2016.

<sup>&</sup>lt;sup>2</sup> Water Resources Protection Plan WDID#1B161035CHUM, Timberland Resource Consultants, October 26, 2016.

exclusively for all cultivation related water needs. The northern pond holds approximately 965,000 gallons. The southern pond is calculated to hold approximately 200,000 gallons. We intend to use these ponds to fill 165,250 gallons of hard plastic storage tanks during the winter to supplement water for cultivation related use during summer months. 128,250 gallons of this hard storage is in the form of rain catchment water tanks that allow water to be collected on the top of the tank and channeled in for additional storage. We estimate we will use approximately 410,000 gallons annually on all three parcels. With the ponds and additional storage; current rain water storage capacity is 1.33 million gallons.

The historic spring diversion that can be seen on the Harris 7.5' USGS Quad Map in the WRPP is the namesake of the farm, Mermaid Spring, and the primary water source for domestic water. It will no longer be used for cultivation, but will be used for hand washing and other potable water needs.

We use low flow drip emitters. This type of irrigation, used alongside mulch, reduces evaporation and aide's water conservation. We also hand water occasionally for application of compost tea.

We test water used for irrigation, rinsing and mixing of topical sprays once per season for nitrates and total bacteria and these records are kept on file in the water management plan. If any water test is outside our normal range, we do an observational review of the water source area to see if there are any obvious problems or situations that can be mitigated. We then take recommended actions to mitigate contamination and retest water as needed. All observational reviews are documented and any mitigation actions are documented in our **Water Source Testing Log**.

Appendix C contains best practices for water testing and Appendix F contains our water testing and use logs. Please see our WRPP for additional information.

### 3.5 Waste Water

Human waste is currently managed by septic connected toilets inside the houses. These structures have unpermitted legacy septic systems. We will work to have the residential human waste disposal systems approved or permitted by Humboldt County. See Section 11, page 7 in the WRPP for more details, and the site map for location.

#### Policy and Procedure for Handling a Sanitation or Safety Hazard in the Field.

Sanitation facilities that have been tipped over or are in any way not available for use will be noted immediately and dealt with in a manner that minimizes the risk of contaminating the produce and environment. In the case of a sanitation unit spilling or

any other septic leakage occurring in or near field boundaries, the following clean-up steps will be performed:

- 1. Any affected produce is immediately disposed of in a covered waste bin.
- 2. The contaminated area will be marked off with caution tape or string.
- 3. Signs in appropriate languages will be posted at the perimeter prohibiting entry to the contaminated area.
- 4. People and animals will be kept out until the area is sufficiently decontaminated.
- 5. Any solid waste still resting on the surface will be collected, shoveled up, and removed to the waste bin.
- 6. Any affected permanent structures will be hosed off and disinfected with a dilute bleach solution.
- 7. The sanitation unit if used will be cleaned up and replaced by the company providing the units and maintenance services.
- 8. The spillage event and corrective actions will be written down in the **Field Sanitation Unit Service Log** and kept in our records.

## **3.6 Hazardous Materials**

Hazardous materials such as: agricultural chemicals, fertilizers, soil amendments, rodenticides, herbicides, fungicides, pesticides and insecticides, fuel used onsite for power generators and/or heating elements as well as cleaners and sanitizers and compressed gasses shall be stored in secure locations within the **metal storage container**, and will be inventoried and reported to the DEH, and C.E.R.S. if they are stored in quantities above 55 gallons for liquids, 500 pounds of solids, or 200 cubic feet for gasses.

**Electrical Power**. We have a solar-inverter system that supplies all electricity to our farm. The solar building is located centrally on the property and has a power shutoff switch. See site map. In the event the solar system fails, a backup generator located within an enclosed steel shipping container will provide power to the facility.

### List of farm machinery (fuel type):

OHV/four wheeler (gasoline) Small generator (gasoline) Skid Steer/Excavator (diesel) Mowers (gasoline) Water Pump(Gasoline) Chain Saws/Lawn Trimmers (mixed oil/gasoline) Water heater (propane) Processing machines (45 watts, runs off solar system)

**Equipment Maintenance.** The larger farm equipment such as skid steer, excavator, four wheelers or OHV's are serviced off site at licensed repair centers. In the event that a breakage requires servicing at the farm site, a licensed repair specialist will be called to service the equipment and will be responsible for removing any associated hazardous waste from the site. Smaller equipment such as the generator, mowers, or lawn trimmers will likely be serviced on site, and any associated hazardous waste will be stored in leak proof containers in the metal shipping container, and removed to a hazardous waste recycling facility within 30 days.

**Gas and Petroleum.** Diesel and gas are stored in a containment tub inside of a fully enclosed metal shipping container. This provides secure storage away from environmental elements.

We have a legacy 1,000-gallon fuel tank with secondary containment as well as other smaller containers of petroleum products stored in a shipping container. The container provides excellent cover and protection.

See Section 9, page 7 of the WRPP for further details. We intend to certify with the state inspector that the 1,000 gallon tank is empty, and discontinue its use.

#### Generator.

In a shipping container, a permanent diesel generator is stored. This container has metal walls and doors that provide adequate cover for the generator and noise attenuation.

Type: MODEL DCA25SSIU WHISPERWATT™ GENERATOR (Standard) Fuel: diesel Power Output: Rated Voltage Single Phase 120 volt/ Max Amps 55.5 (4 wire), Single Phase 240 Volt/27.8 amps (4 wire) Three Phase 240 Volt/60 amps Three Phase 480 Volt/30 amps Decibel Reading: 75 ft.=48dB (see biology report)

Petroleum products of any kind may not be stored or used within the perimeter of the farm fields. Petroleum products in small containers must be kept in the metal storage container in approved containers. All refueling must take place away from cultivation areas to minimize the risk of petroleum contamination to the soil and plants. All above ground tanks shall be built in a manner that allow for containment of the tank contents in the event of a leak per safety standards. Any used oil, filters or other hazardous waste

shall be stored in appropriate leak proof containers and taken to the hazardous waste facility at Eel River disposal, or the Cal Trans yard promptly.

**LIQUID PETROLEUM SPILL PROCEDURE:** If gas or oil is spilled; immediate attention will be taken to stop the spill by turning off valves or plugging the source of the leak. If the source is a tank or any other kind of container and it is punctured, a wooden plug or a bolt will be used to prevent further leaking. After stopping the spill, the contaminated soil will be removed from the ground and contained in a bucket, pail, or other non-permeable container. All soil that has visible oil stains or petroleum odor will be dug out and contained. The contaminated soil will be disposed of in accordance with state law.

After the cleaning process is finished, the employee or family member must submit a report of the incident describing what was spilled and the amount, how the spill was cleaned, and the steps that will be taken to prevent future spills. Illustrations or diagrams should be included to show the contaminated area, the excavation of the soil, and the kind of waste that was created. The spillage event and corrective actions will be written down in the **Spill Log** and kept in our records at the main facility.

AGRICULTURAL CHEMICAL OR PESTICIDE SPILL: Wear protective gloves and face mask when cleaning up a spill. Record spill in **Field Sanitation Unit Service Log**.

Dry spills. (granular, dust, wettable, dispersible and soluble powder formulations)

- 1. Cover the spill with plastic or a tarp to prevent a breeze from moving the material.
- 2. Put weights on the cover.
- 3. Use a broom, dust pan or shovel to sweep up the spill while rolling back the tarp to expose only a small area at a time.
- 4. Place spillage in metal or plastic containers. Plastic bags may be used, but only as a last resort.
- 5. Secure and label the containers for later disposal. If at all possible, assess the volume of spilled material, review the label and application rates, and then apply as a legal application. Use of the product, though not necessarily for pest control, is legal and allows the material to breakdown under normal application conditions; thus, negating the possible need to handle the material as an expensive hazardous waste. If application is not possible, dispose of as a hazardous or non-hazardous waste.

Liquid spills.

- 1. Soak up the liquid with an appropriate absorbent. (sweeping compound, sawdust).
- 2. Use a broom to work the absorbent into the spill.
- 3. Gather the combined material and deposit it in a labeled plastic or metal container.
- 4. Contaminated soil may need to be removed. Soil should be packaged in labeled containers for later disposal. If at all possible, assess the volume of spilled

material, review label and application rates, and then apply as a legal application. Use of the product, though not necessarily for pest control, is legal and allows the material to breakdown under normal application conditions; thus, negating the need to handle the material as an expensive hazardous waste. If application is not possible, dispose of the material as a hazardous or non-hazardous waste depending on the product.

## 3.7 Animals/Wildlife/Livestock

**Wildlife.** There are various types of wildlife on site which we cohabitate with peacefully such as deer, raccoons, bobcats, snakes, deer and others. We hope that improving and consolidating the farm operations will further limit impacts to the wildlife on our property.

**Livestock.** We do not have livestock or manure lagoons. Our cultivation areas are not located near or adjacent to dairy, livestock, or fowl production facilities or manure. Livestock animals are not allowed in or near sources of irrigation water.

**Fence and Field inspections.** Cultivation areas are monitored for presence and signs of wild and domestic animals entering the production areas. Daily, we do a field perimeter check to look for animal tracks and pathways, animal resting areas, or other signs of animals in the fields. Personnel are instructed to notify the farm manager if during their normal farming activities they notice signs of animals passing through or feeding in the production areas.

We record disturbances on our inspection and any actions taken in the **Fence Perimeter and Field Inspection Log (Appendix F)**.

Inspecting the fences and fields will include the following:

- Walking the fence line observing any places where the fence may be compromised or in need of repair. All repairs are noted in the Fence Perimeter and Field Inspection Log.
- Making sure there are no weaknesses or places where animals are clearly entering and exiting the fields.
- Visually inspecting the fields from the outside to see if there are any noticeable signs of animal presence. If animal presence is noted, affected sections of the field will be noted.

## 3.8 Light Pollution

All outdoor lighting used for security purposes is shielded, downward facing and should be motion-sensor lighting, therefore, the lights should only be used as needed. Light sources will comply with the International Dark Sky Association standards for *Lighting*  *Zone 0* and *Lighting Zone 1*, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG).

Juvenile plants within greenhouses may be under lights overnight for the purpose of increasing plant growth, see sheet P-4 in the site plan for lighting diagram. In case lights are used for this purpose, we cover greenhouses at sundown with plastic covers that are impenetrable by light, and uncover them at sunrise. Light should not escape at a level that is visible from neighboring properties between sunset and sunrise as required by CMMLUO §314-55-4.11(v).

## 3.9 Cultural Resources

A Cultural Resources Investigation for Commercial Medical Cannabis Cultivation Mermaid Spring, MBC has been completed by: William Rich, M.A., RPA William Rich and Associates P.O. Box 184 Bayside, CA 95524. If buried archaeological or historical resources are encountered during construction or cultivation activities, MSF personnel or contractor shall temporarily halt all work in the immediate area, and contact a qualified archaeologist 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, 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.

## Part 4: Cultivation Plan

## 4.1 Planting and Harvesting

Cultivation will occur two times a year in greenhouses that utilize light deprivation techniques to shorten the harvest time, as well as full term outdoor cannabis plants in designated areas (see site plan, and cultivation schedule) that are planted once a year.

**Flooring in the Greenhouses:HCC314-43.1.3.2** The greenhouse do not result in lot coverage exceeding 5 acres and do not have an improved floor or foot path that will preclude the agricultural use of the underlying soil.

All objects that come into contact with plants must be clean, in good working condition, and cleaned and/or sanitized on a regular basis. This includes, for example, hands, harvesting equipment (knives, pruners, etc); harvesting tote transportation equipment; bulk hauling vehicles; processing equipment (tables, tubs); and storage equipment.

#### Immature Plant Area:

See site map for location of immature plant areas. Planting begins in April with both seeds and clones. Clones are purchased from a licensed nursery. Once on our farm they may be transplanted into larger pots and undergo a small amount of supplemental light until they are planted. The clones and seed starts are located in the nursery before going into the permanent beds

**Planting.** Full term outdoor plants are generally planted in late June and harvested in October. The first light deprivation plants are planted in beds in the beginning of May and harvested in July, at which time the beds are replanted for the second and final harvest in October.

Immature plants are grouped in batches by strain and planting date per the traceability protocol in Section 7.1 of this document. Upon transferring plants into designated growing areas, MSF personnel records plant UID information with their respective growing area on the **Planting Events log sheet** (see Appendix F). The data collected throughout the season is used to analyze yield and improve on future production.

We use low flow drip emitters for irrigation. This type of irrigation, used alongside mulch, reduces evaporation and aide's water conservation. Fertilization using OMRI Certified fertilizers and compost teas is accomplished via hand watering. All pots will have water catchment trays underneath the pot to eliminate discharge and prevent water loss.

**Harvesting.** The harvest process starts by clipping two or three foot long sections of the mature plant. Small batches are then transported inside totes to the curing facility. The totes are labeled with the batch UID. Cannabis is harvested over several consecutive days, depending on the size of the area ready for harvest. Harvest information is recorded on the **Harvest events log** and required data is entered into State and County track and trace systems per section 7.1 of this document. All harvested materials are segregated per license type within the shared facilities as outlined on the site map.

**Harvest tool policy**. The tools we use for harvesting consists of both hand pruners and smaller scissors. There will be a tool storage shed outside of the metal building. For sterilization we will use a self-contained cleaning basin. We use rubbing alcohol for sterilization. Any tool used for harvesting, such as a shears or scissors, should be cleaned and/or disinfected daily. If this is not clean, that tool may not be used for harvesting. Cleaning history is kept on file in the **Harvest Tool and Container Cleaning Log**.

Harvesting totes/containers. The harvest totes are kept in good repair and damaged ones are immediately discarded or repaired. Harvesting totes will be cleaned and disinfected before each harvest season and whenever needed. Each tote is numbered and individually identified and its cleaning history should be kept on file in the Harvest Tool & Container Cleaning Log. Totes not in use should be stored in a clean and secure location.

Harvesting totes should not be used for carrying anything but cannabis. If something other than cannabis is placed in a harvesting tote, that tote must be cleaned or disinfected. Before moving cannabis from the field, excessive dirt and mud should be removed from totes and pallets as much as possible. It is our **policy** that any product that is being moved from the field to the processing and storage house should be covered. All containers used for field packing are new, or sanitized plastic containers.

### 4.2 Pest Management

See Section 8, page 7 of the WRPP for inspection details.

#### Rodents.

<u>Indicators</u>: chew marks at base of plants, or droppings found in production areas, dirt mounds from gophers etc..

We do not use rodenticides. Traps are placed in pest problem areas as required. Traps are checked daily by the farm manager or appointed personnel. Records are kept of the daily checks as well as any rodents that are found in the traps on the **Pest Management log (Appendix F)**. Any deceased rodents are disposed of in the trash using single use gloves.

All walls, doors, and windows in buildings are inspected. All windows are screened. Any holes are repaired to prevent pest and/or bird entrance into the buildings. Employees are trained to report any signs of infestation in the field or processing and storage areas.

**Pests.** "Any insect, predatory animal, rodent, nematode or weed; and any form of terrestrial, aquatic, or aerial plant or animal virus, fungus, bacteria, or other microorganism (except viruses, fungi, bacteria, or other microorganisms on or in living man or other living animals)."CDFA

<u>Indicators</u>: spotted or curled leaves, webs, fungus gnats or white flies. We strongly believe that preventative measures are the best policy. Bi-weekly application of organic pesticide during the vegetative cycle can help reduce the chance of infestation. All pesticides and fungicides used at MSF are OMRI approved products. Pesticide is never applied to flowering plants, when pollinators are present, or when high winds are present. Our practices ensure that pesticide does not reach surface or groundwater at any time.

MSF personnel should record pesticide application in the Pest Management log. Refer to Table 1 below for type of pesticides used and amount applied annually. Any pesticide products along with the MSDS documents are safely stored in the metal building. Spills or leaks are cleaned up immediately (refer to section 3.5 Hazardous Materials for cleanup protocol).

Any uses of pesticide products shall be in compliance with the State pesticide laws and regulations enforced by the County Agricultural Commissioner's Office and the California Department of Pesticide Regulation, as well as CMMLUO.

#### Fungus Control.

Indicators: white powdery mildew, root rot, stem rot

Preventative measures are the best policy. Bi-weekly application of Dr. Zymes fungicide reduces the chance of infestation.

Any uses of fungicide products shall be in compliance with the State laws and regulations enforced by the County Agricultural Commissioner's Office. Fungicide products are safely stored in the metal shipping container along with corresponding MSDS sheets. The following table identifies pesticides and fungicides used in cultivation.

TABLE 1 Pestic	cides and Fungio		
Type/Brand	Quantity Used	Frequency/Rate of	Active Ingredient
	Annually	Application (Depends on	
	(gallons/year)	growth stage)	
Dr. Zymes	10	Bi-weekly	Citric acid
Eliminator			
PLANT	10	Bi-weekly	Soy Oil, Peppermint
THERAPY			Essential Oil, Citric Acid
MilStop	10	AS NEEDED	Potassium Bicarbonate
SULFUR	30 POUNDS	AS NEEDED	SULFUR

### 4.3 Waste Management

**Solid Waste and Recycling.** We aim to prevent vectors for disease, infestation, or nuisance with our facilities solid waste. Cultivation-related wastes including, but not limited to, empty soil/soil amendment/fertilizer/pesticide bags and containers, empty plant pots or containers, dead or harvested plant waste, and spent growth medium shall be stored in water tight storage containers or in the dump trailer, and removed weekly if putrescible, and monthly otherwise.

Covered trash and recycling containers are placed throughout the farm in locations where trash may accumulate, but within the fenced areas to prevent bear access. Filled waste containers are stored within the metal storage container, and are self-hauled to the Redway Transfer Station on Conservation Camp Rd, Redway, CA 95560.

**Cannabis Waste.** Cultivation organic matter such as stems and leaves from cannabis plants are composted in a designated area identified on plot plan. Compost will be handled and processed on site according to Title 14 of the California Code of Regulations at Division 7, Chapter 3.1 summarized in Appendix D.

Cannabis waste will be identified, weighed and tracked in the track-and-trace system per section 7.2 of this document. MSF personnel should maintain accurate and comprehensive records regarding cannabis waste that account for, reconcile, and evidence all activity related to the generation or disposition of cannabis waste. Cannabis waste records will be stored in the MSF records binder located in Storage Shed 2.

In the case that composting on site is not possible due to legal constraints, cannabis waste should be stored in a secure fenced area with restricted access for MSF personnel, local agency or contracted waste hauler. Organic waste, which is not composted on site, shall be hauled by MSF personnel to Redway Transfer Station on Conservation Camp Rd, Redway, CA 95560, or to a manned fully permitted composting operation or facility as identified in CDFA Cannabis Cultivation regulations section 8108.

MSF personnel should obtain and retain a copy of a certified weight ticket, or receipt documenting delivery, prepared by a representative(s) of the solid waste facility receiving the self-hauled cannabis waste. Transportation of self-hauled cannabis waste shall only be performed by personnel of MSF.

## Part 5: Curing, Processing and Packaging

All processing and packaging happens in the 30' x 40' metal building called the Main Facility on Parcel 1 (APN's: 216-025-009 and 216-025-016). The facility is split into three sections that are divided between the three CDFA licenses. There is hand washing and first aid available in the Main Facility as well.

The Curing, Processing and Storage Facilities should be accessed by authorized personnel only. Traceability protocols and sanitation practices will minimize cross contamination between batches. Processing is currently performed by family members only.

## 5.1 Curing Process

Harvested cannabis associated with CDFA Mixed Light License #1 is cured within the designated area in the Main Facility or the Barn.

Harvested cannabis associated with CDFA Mixed Light License #2 is cured within the designated area in the Main Facility and in the Auxiliary Curing Shed on Parcel 2 (APN 216-025-011).

Harvested cannabis associated with CDFA Outdoor License #1 is cured within the designated area in the Main Facility or the Barn.

During the initial harvest, any mold is completely removed and disposed of in a compost pile. Plants are hung in strain specific batches on wire basket racks in the Metal Building. UID tags are hung with the batches to prevent disruption to the traceability protocols. The curing house is kept at 72°F and 60% humidity until the flowers are properly cured. Cured batches are sealed in cleaned and labeled storage totes and stored in a locking metal shipping container by license type until it is time to process.

## 5.2 Processing, Packaging & Labeling

Until we are permitted to process in a building on site, we will seasonally hire either a mobile processing operation to process in the open air, or transport the cannabis to an offsite processing facility.

Once licensed for the use, Processing and packaging will occur on Parcel 1 (APN's: 216-025-009 and 216-025-016) either at the Main Facility after such time as the Main Facility is permitted for Processing and Packaging, or in the future within a new fully permitted commercial processing building on site.

Due to the small size of our farm, and to minimize road use by processing personnel, we often use a single person operable cannagin for stripping the flowers from the stem, and dry trimming machines to process the plants. Operators are trained in the safe use of the machines. The cannagin, and trimming machines are cleaned and sterilized between batches to limit cross contamination by different strains.

Separate strains and plants will maintain traceability by batch processing and segregated staging in sealed totes.

Processing and packaging operations should be performed under clean and sanitary conditions, including all work surfaces and equipment. Only trained personnel will use processing equipment. People handling cannabis in processing operations will have access to premium quality facemasks, gloves, work surfaces and seating as well as hand washing stations.

**Packaging and Labeling Cannabis.** The finished flowers are either transferred to a manufacturer or distributor for packaging and labeling or

**Packaged and Labeled on site:** the following requirements are followed by the cultivator (according to Chapter 12 Packaging and Labeling [26120-26121] of State BPC code and the California Department of Public Health).

- 1. Cannabis and non-manufactured cannabis products are labeled and placed in a re-sealable (for products with multiple uses), tamper-evident, child-resistant package which includes the harvest batch UID (described in section 7.2).
- Child resistant packaging (CRP) is designed to be difficult for children under five years of age to open. The type of CRP for cannabis flowers and nonmanufactured cannabis products can be "Single Use" (or Initial CRP) packaging. Ensure your packaging supplier has proof of certification that the Packaging meets the PPPA standard.
- 3. Packages and labels are NOT made to be attractive to children, or imitate packaging typically marketed to children.
- 4. Packaging cannot imitate packaging used for non-cannabis food products.
- 5. All cannabis labels and inserts include the following information prominently displayed in a clear and legible fashion in accordance with the requirements, including font size, prescribed by the bureau or the State Department of Public Health (The following statements, in bold print):
  - a) For cannabis: "GOVERNMENT WARNING: THIS PACKAGE CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OFREACH OF CHILDREN AND ANIMALS. CANNABIS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. CANNABIS

USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."

- b) For non-manufactured cannabis products: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEPOUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OFAGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."
- 6. For packages containing only dried flower, the net weight of cannabis in the package.
- 7. Identification of the source and date of cultivation, the type of cannabis or cannabis product and the date of manufacturing and packaging.
- 8. The appellation of origin, if any.
- List of pharmacologically active ingredients, including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoid content, the THC and other cannabinoid amount in milligrams per serving, servings per package, and the THC and other cannabinoid amount in milligrams for the package total.
- 10. Information associated with the unique identifier issued by the Department of Food and Agriculture.
- 11. Any other requirement set by the bureau or the State Department of Public Health.

All packing containers used for packaging finished cannabis are new. Packaging containers are covered and stored in the main facility. Pallets and containers are kept in good condition; if broken or ripped they are disposed.

**Processing Worker Health and Hygiene Policy.** Personnel should wear clean clothing to work every day. When required, personnel will wear appropriate supplied clothing including hats, hairnets, aprons, and disposable gloves. No jewelry is allowed in the packinghouse or packing facility with the exception of a plain wedding band (no stones allowed). Personnel areas including lunch and break areas are located in the main facility and are kept clean. Under no circumstances will glass containers be allowed in the processing area.

**General housekeeping.** Only non-toxic food-grade cleaners may be used in cleaning processing and packaging surfaces. Sanitation chemicals have their own storage area separate from the processing line, and are marked on the building map.

Areas outside the processing facility are covered in gravel or wood chips and wellmaintained. They are free of debris that could harbor pests and free of standing water. Garbage cans/dumpsters are covered and located away from entrances.

The processing and packaging facilities will be clean and orderly before and after use. Light bulbs are protected from breakage by either being in sleeves, covered, or be made of shatterproof material. Pipes, ducts, fans and ceilings are kept clean. At the end of each day, packing areas are dry swept. The grading, sorting, and packing lines are cleaned and sanitized as well. A thorough cleaning, including floors, will happen on a weekly basis or as needed and this will be recorded on the **Processing & Packaging Line Cleaning Log.** 

**Policy for produce that hits the floor.** If product falls or is dropped to the floor it may not be picked up and put back on the packing line and dropped produce should remain on the floor. Dirty product will be cleaned from the floor regularly. Product will be swept or pushed away from the packing line and shoveled into the clearly marked waste bins. Employees will wash their hands before returning to the packing line. The product in the waste bin will be emptied at the end of the day, or sooner, and taken to the compost.

## Part 6: Storage and Transportation

## 6.1 Storage area housekeeping

The packaged product will be stored in a license designated locked metal container in strain specific batches that maintain traceability. Items should be checked in and out of the container by MSF personnel only, and product being transferred is recorded in the **Cannabis Release Log.** 

Storage areas are kept clean, secure, and tidy. The general housekeeping policy for the storage area is the same as for the packinghouse areas, as is the pest and rodent control program.

## 6.2 Transportation of Cannabis

Only Licensed Transporters can transport cannabis on public roads. All delivery trucks and vehicles used to transport cannabis are inspected for odors and signs of unsanitary conditions before loading. If a vehicle is found to be unsanitary, it should be cleaned and sanitized before cannabis is loaded. All records of inspections and cleaning should be kept on the **Delivery Vehicle Cleaning and Inspection Log.** 

Equipment used to carry potentially hazardous items including fertilizers or pesticides will not be used. Any contracted truck operators will be asked to state the last load that was hauled in the vehicle and provide a cleaning schedule for the vehicle before loading, as well as a log of previous loads. Cannabis will be loaded carefully so that risk of damage will be minimized

Cannabis that is transported off MSF premises will be documented on the **Shipping Manifest** and entered into the track and trace system per section **7.3 Commercial Traceability**. Shipping Manifest records will be kept for seven (7) years (refer to section 7.6 Records Retention). A shipping manifest shall accompany every transport of cannabis.

## Part 7: Traceability, Records and Sales

## 7.1 Traceability General Procedures

Traceability requirements are subject to change. MSF verify with the CDFA annually.

#### Until such time as the below becomes obsolete, protocol is as follows:

MSF reports in the CDFA track-and-trace systems the disposition of immature and mature plants, non-manufactured cannabis products on the premises, any transfers associated with commercial cannabis activity, and any cannabis waste. All commercial cannabis activities shall be entered in the track and trace systems. Cannabis is entered into the track-and-trace system starting with seed, clone propagated onsite or purchased from a licensed nursery, or seedling purchased from a licensed nursery.

Loss of access to track and trace system and errors. Any errors that occur in the system are corrected within three business days. If by chance access to the track-and-trace system is lost, MSF personnel will maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access. Upon recovering access, all inventory tracking activities that occurred during the loss of access of access will be entered into the system within three (3) business days. Document the date and time when access to the system was lost and when it was recovered as well as the cause for each loss of access. During the time when access to the system is lost, cannabis or non-manufactured cannabis products may not be released to a distributor.

## **Pre-Existing Cannabis prior to receiving State license. See Appendix E** for important instructions to follow upon issuance of Sate Annual License to deal with pre-

existing cannabis plants on the farm. Also, procedures for closing out inventory in the case that license is surrendered, expired or revoked.

## 7.2 Field Traceability

#### 1) Immature Plants

a. <u>State UID Procedure</u> – immature plants are grouped in lots of up to 100 plants. Each lot of immature plants is assigned a UID. The lot UID label is maintained so as to be clearly visible and free of dirt and debris. Each individual immature plant in a lot is labeled with the corresponding UID number assigned to the lot, and shall be contiguous to one another.

Immature plants transferred from a licensed nursery, via a distributor to MSF will follow the same requirements above for UID labeling.

b. <u>State Reporting Requirement</u> – Immature plant lot UID information is entered into the track and trace system within three (3) days of creation of the UID. If clones or seedlings are physically received or rejected by MSF personnel from another licensee, this transfer is reported in the track and trace system (refer to section 7.4 for required info to be entered).

#### 2) Mature Plants

- a. <u>Sate UID Procedure</u> Upon transferring plants to designated planting areas, each plant is given their own individual State UID label, attached to the main stem at the base of each plant using a tamper evident strap or zip tie. All labels will be clearly visible and free of dirt and debris. The label/tags remain on the plant until harvested or disposed of.
- b. <u>State Reporting Requirement</u> Mature plants are reported in the track and trace system upon any change in disposition, including when the plants have flowered, and if plants are destroyed and disposed of (likely due to mold or bugs, rendering the plant unusable).

#### 3) Harvested Cannabis

- a. <u>State UID Procedure</u> Harvested cannabis plants are batched and assigned a unique harvest batch name which is associated with all the UIDs of each individual plant, or portion contained within the harvest batch.
- **b.** <u>State Reporting Requirement</u> Each unique harvest batch name is entered in the track and trace system within three (3) days of harvest.

#### 4) Cured and processed cannabis

**a.** <u>State UID Procedure</u> – finished cannabis and non-manufactured cannabis products are labeled with UID's associated with the corresponding harvest batch name that they are derived from.

b. <u>State Reporting Requirement</u> – Record the net weight of all cannabis once the majority of drying, trimming and curing activities have been completed, or within sixty (60) calendar days from the initial harvest date, whichever is sooner.

#### 5) Cannabis waste

a. <u>UID Procedure</u> – Upon destruction or disposal of any cannabis or nonmanufactured cannabis products, the applicable UIDs shall be retired in the track-and-trace system by the licensee within three (3) business days of the destruction or disposal and be performed in accordance with the licensee's approved cannabis waste management plan. Reporting Requirement – In addition to retiring UID's for disposed cannabis

<u>Reporting Requirement</u> – In addition to retiring UID's for disposed cannabis (due to plant damage), Cannabis compost weight is to be reported in track and trace. Refer to section 4.3 for cannabis compost recording procedures.

## 7.3 Commercial Traceability

Each transfer of Cannabis or non-manufactured cannabis product between licensed entities is recorded and entered into the track and trace system.

#### STATE:

<u>Cannabis transferred FROM MSF</u> – All transfers of cannabis or non-manufactured cannabis products from MSF to another licensed entity is entered in the track and-trace system prior to the movement of the cannabis or non-manufactured cannabis product off the premises. **Refer to section 7.4 Sales Invoices and Receipt Requirements** for required information to be recorded and entered into track and trace.

<u>Cannabis transferred TO MSF</u> – All cannabis or non-manufactured cannabis products physically received or rejected by MSF from another licensed entity is entered in the track and trace system within twenty-four (24) hours of receipt or rejection of the products. **Refer to section 7.4 Sales Invoices and Receipt Requirements** for required information to be recorded and entered into track and trace.

## 7.4 Sales invoices and receipt requirements

MSF personnel will prepare a sales invoice for every sale or transport of cannabis or non-manufactured cannabis product to another licensee. Sales invoices and receipts may be retained electronically but must be readily accessible for examination by the Ag Department, other state licensing authorities, any state or local law enforcement authority, and the California Department of Tax and Fee Administration. Each sales invoice or receipt shall include the following (**See Appendix F for Sales Invoice form**):

- \*\* Required info to enter in Track and Trace system
- 1) \*\* Name, business address, and Ag Department issued license number of the seller;

- \*\* Name, business address, and Ag Department issued license number of the purchaser;
- 3) \*\* Name and department issued license number of the distributor
- 4) \*\* Date of sale or transfer -- month, day and year RECEIVED by MSF;
- 5) Invoice or receipt number;
- 6) \*\* Weight or quantity of cannabis and non-manufactured cannabis products sold. Refer to Weighing protocol in section 7.5 below.
- 7) Cost to the purchaser, including any discount applied to the total price, shall be recorded on the invoice.
- 8) \*\* Estimated departure and arrival time and actual departure time;
- 9) \*\* Description for each item including strain or cultivar, and all of the applicable information below:
  - a) Plant;
  - b) Flower;
  - c) Leaf;
  - d) Shake;
  - e) Kief; and
  - f) Pre-rolls.
- 10) \*\*UID's
- 11) Signature of the seller, or designated representative of the seller, acknowledging accuracy of the cannabis and non-manufactured cannabis products being shipped.
- 12) Signature of the purchaser, or designated representative of the purchaser, acknowledging receipt or rejection of the cannabis or non-manufactured cannabis products.

## 7.5 Weighing

Cannabis or non-manufactured cannabis products are weighed for data input into the track and trace systems, when it is packaged for sale, and when it is bought or sold. In all of the above occurrences, weight of cannabis or non-manufactured cannabis products, is determined using a weighing device that is approved, tested and sealed pursuant to chapter 5 (commencing with section 12500) of division 5 of the Business and Professions Code, and registered with the county sealer consistent with chapter 2 (commencing with section 12240) of division 5 of the Business and Professions Code.

- Weight. Wet weight and net weight shall be measured, recorded and reported in U.S. Customary units (e.g., ounce or pound); or International System units (e.g., kilograms, grams, or milligrams).
- 2) Count. For the purposes of this section count means the numerical count of the individual plants or units.

#### Weights and Measures Certification.

Anything entered into the state track and trace program will require a certified weigh scale and operator. We will make sure that our scales are certified and our operators licensed through the Weighmaster program of the CDFA. Scale verifiability will be checked through email contact with the Ag Commissioner's office if needed and/or we will purchase the appropriate certifiable scales and take them to the County Ag

Department to be calibrated and certified for commercial use. Different classes of scales will be used depending on the weight of individual selling units.

"The Weighmaster Enforcement program assures that commercial transactions based on quantities certified on a Weighmaster Certificate are accurate. The program licenses as Weighmasters, individuals or firms who weigh or measure bulk commodities and issue certificates of accuracy. Program activities include re weighing of vehicles and containers to verify the net weight statements on Weighmaster Certificates and routine as well as spot inspection of establishments involved in bulk sales. 1 Business and Professions Code (BPC) Division 5, Chapter 7 – Weighmasters, § 12730(f). 2 BPC Division 5, Chapter 7 – Weighmasters, §

12730(a) and (b)."

-CDFA

## 7.6 Record Retention

MSF personnel should keep and maintain the following records for at least seven (7) years from the date the document was created. Records will be securely stored in the Main Facility and are available for review by the Ag Department upon request, or during regular business hours (8:00am – 5:00 pm PST).

- 1. Ag Department issued cultivation license(s);
- 2. Cultivation plan;
- 3. All records evidencing compliance with the environmental protection measures pursuant to sections 8304, 8305, 8306 and 8307 of Title 3, Food and Agriculture, Division 8, Cannabis Cultivation Chapter 1.
- 4. All supporting documentation for data or information input into the track-and-trace system;
- 5. All UIDs assigned to product in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system must be retained for six (6) months after the date the tags were retired;
- 6. Financial records, including but not limited to, bank statements, tax records, sales invoices, and sales receipts;
- 7. Personnel records, including each employee's full name, social security, or individual tax payer identification number, date of beginning employment, and date of termination of employment if applicable;
- Records related to employee training for the track-and-track system or other requirements of this Chapter. Records shall include, but are not limited to, the date(s) training occurred, description of the training provided, and the names of the employees that received the training;
- 9. Contracts with other state licensed cannabis businesses;
- 10. Permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity;
- 11. Security records; and
- 12. Records associated with composting or disposal of cannabis waste.

13. Documentation associated with loss of access to the track-and-trace system prepared pursuant to section 8402 (d) of this Chapter.

## Part 8: Security

The property has multiple locked gates at the entrances to various road sections to prevent unauthorized vehicles from gaining access to the property. See the map for locations.

Personnel are trained to be advocates for security and safety by monitoring and reporting any unusual persons near the entry road, signs of persons such as boot prints, or unusual vehicles adjacent to the property.

In the event it is discovered that an unauthorized person has gained access to the property, personnel will ask the person to leave the property. If the person refuses to leave, authorities will be contacted to remove the intruder, and a police report should be filed.

All Medical Cannabis is stored in a designated locking metal shipping container and each item should be checked in and out of the container by recording it on the **Cannabis Release Log (see Appendix F)**.

Relevant safety warnings will be printed on all packaging that leaves the farm (see section 5.2 Labeling). No minors are allowed in the cultivation, drying, or processing areas at any time.

## Part 9: Personnel

**Please Note:** We have <u>no employees</u>. This section of the document is intended to be the guidelines used for future employees.

**In the event that employees are hired:** We shall comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers, including: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

We will visibly post and maintain an emergency contact list in the main facility:

#### EMERGENCY RESPONSE CONTACT:

Operation manager contact: Erik Stugard, 707-223-3646

Emergency responder contacts - 9-1-1

Poison Control Center - 800-222-1222

Fire Department – 9-1-1

Garberville Fire Station - 707-923-2645

Humboldt County Sheriff's Department - 707-923-2761

Southern Humboldt Community Clinic – 707-923-3925

Frank R Howard Memorial Hospital-707-459-6801

### 9.1 Personnel Training

All family members and employees receive training on an ongoing basis as new technologies are implemented and practices optimized. Refresher courses are provided as needed. Training includes instruction on all company policies related to worker health and hygiene and (where appropriate) training related to specific jobs as required by law (for example, equipment, vehicle licensing or training).

Safety training relevant to specific job functions may include:

- 1) Emergency action response planning as necessary;
- 2) Employee accident reporting and investigation policies;
- 3) Fire prevention and water locations;

4) Hazard communication policies, including maintenance of material safety data sheets (MSDS);

- 5) Materials handling policies;
- 6) Job hazard analyses; and
- 7) Personal protective equipment policies, including respiratory protection.

Employee training is documented on the **Employee Training Log** at the main facility. A copy of the Employee Training Log form can be found in Appendix F. Documentation of training includes employee's printed name and signature, description of training, written materials or video/DVD, date, and name of person doing the training. Training will be provided in the language of the employees.

## 9.2 Health and Hygiene policy

**Visitors.** All visitors should sign in at the farm entrance and read a copy of farm policies regarding health and hygiene. Visitors are defined as anyone on the farm for more than 15 minutes to conduct farm related business, or goes in plant production or processing areas. Visitors will be asked to wash their hands when entering the processing areas. Visitors are not allowed to pick produce or handle product without the permission of the

farm manager, or owner. All visitors should sign in when arriving and sign out before leaving.

Hand washing and toilet facilities. Clean and well-maintained toilet and hand washing facilities are provided for all family in the family home. Restroom facilities will be upgraded to accommodate any new employees, and to meet all applicable health and employment regulations required prior to hiring new employees. All toilet/restroom facilities are properly supplied with single-use towels. These facilities are checked on an ongoing basis. Restroom facilities are serviced and cleaned as needed. Monitoring, restocking, and cleaning are documented on the Restroom Cleaning Logs and are located in the folder chained to the wall outside the restroom. A copy of the log form can be found in Appendix F.

**Hand washing.** Everyone must wash their hands before beginning work and returning to work after taking breaks, going to the restroom, eating, smoking, or whenever their hands are dirty. Signs in English and employee languages are posted in restrooms, eating areas, and smoking areas to instruct employees to wash their hands before beginning and returning to work.

**Toilets.** Flush toilets and sinks are located in the family home and are on a private septic system pending a retroactive permit. Portable toilets will be available within 1/4 mile of each worksite as required.

**Drinking Water Policy.** Potable drinking water is provided and available for visitors, family and employees in the family home, or will be provided in the form of bottled water. All personnel are notified of this policy during training and instructed to notify their supervisors if water is not available or if disposable cups are not available. *No glass is allowed in the fields.* 

## 9.3 Injury and Illness Policies

**Injuries.** If someone is injured at the farm, either in the packinghouse or in the field, the first aid kits are available for use in/at the Main Facility, the family bathroom and at the entrance to each work site. The supplies are checked and updated monthly. History of refilling first aid kits are kept in the **First Aid Kit log.** The log form can be found in Appendix F.

All workers are instructed during training to deal with injuries immediately. This includes any cuts, abrasions, or other injury that happens while working. Employees must notify the farm manager or their supervisor and fill out an accident report. If the injury is critical or life threatening, employees are instructed to call 911 for proper care. **Blood and body fluid.** If blood or other bodily fluid should come in contact with cannabis or in the field, immediate action must be taken. If a person is not able to immediately deal with the contamination due to injury, that person must mark the area if able and immediately notify the farm manager or his/her supervisor who will take appropriate action.

If an employee is injured in the field or packinghouse, the farm manager or supervisorafter assuring the employee's safety--will immediately inspect the area where the injury happened to make sure no blood or bodily fluids have contaminated the area.

If there is blood in the field, all contaminated surfaces will be removed to a plastic bag with a shovel or gloved hands and placed in a trash can. All affected soil will be shoveled up around and under the area and will be removed. All affected produce will be discarded in a burn pile. All actions will be documented on the **Illness and Injury Form.** A copy of the log form can be found in Appendix F.

**Illness**. Any employee who is sick should notify the farm manager or his/her supervisor immediately and must not handle fresh produce. If an employee does not report his or her illness and is found to be sick by the farm manager or supervisor, the employee will be immediately dismissed from work and not allowed to return until they are symptom free.

- 1) The following symptoms prohibit an employee from working and handling fresh produce.
  - Diarrhea
  - Fever
  - Vomiting
  - Jaundice
  - Sore throat with fever
  - Lesions containing pus (including boils or infected wounds, however small) on the hand, wrist, or any exposed body part
- 2) If an employee has any of the conditions listed above, these conditions will be recorded on the **Illness and Injury Form.**

## 9.4 Employee Safety and Security Empowerment

All employees are instructed to share information they observe regarding safety and security. If employees see unusual individuals or situations, they should notify their supervisors so they can evaluate the situation. If employees notice pests or other safety

issues, they are encouraged to share this information with their supervisors. Our company safety policy includes all employees and is companywide.

**Clothing, Jewelry, and Cell Phone Policy.** Employees should wear clean clothing to work every day. No jewelry is permitted in the field, around machinery, packinghouse, or packing facility with the exception of a plain wedding band (no stones allowed) and wrist watches. Cell phones are not allowed unless they are required for farm business. All cell phones will be stored in lockers or kept in a belt holster or pants pocket.

## 9.5 Policy on Taking Breaks

Breaks that include eating or smoking must be taken in areas away from plants production and packing. At the packinghouse, there are break areas which are away from production. Breaks in the field are taken in areas not in production or near harvestable crops.

Short rest breaks are permitted in the field during production as long as workers are not eating or smoking. Lunch breaks can be taken in the forest, in cars which are parked outside of harvest and production areas or in the break-room. Employees must wash hands prior to returning to work.

All personal items must be stored in designated areas in the field, break room, and packinghouse. Under no circumstances will glass containers be allowed in the field.

Appendix A Site Plan / Premises Diagram

Appendix B CULTIVATION SCHEDULE

## **APPENDIX C** Water Testing Procedures

There is not a national irrigation water standard which sets minimum microbial levels allowable for irrigation water. You are taking water samples to establish a baseline and monitor for changes.

There are some commodity specific guidelines which give recommendations for water quality and can be used as a reference source for determining thresholds. If you are a member of a commodity group, please refer to their guidelines.

All irrigation water and water used to mix topical, pesticide, or protective sprays should be tested for generic *E.coli*, nitrates, and nitrites and the tests should be quantified. Depending on the source and the use, the frequency of testing will vary.

For post-harvest water, water must meet the US EPA Drinking Water Standard. <u>http://water.epa.gov/drink/</u>

Total Coliforms (including fecal coliform and *E. coli*) maximum contaminant level goal (mcgl) 0 (mg/l)<sup>2</sup>. Coliforms are naturally present in the environment. Fecal coliforms and *E.* coli come from human and animal fecal waste.

Nitrates mclg 10 (mg/l)<sup>2</sup>. Sources include runoff from fertilizer use, leaking septic tanks, or sewage.

Nitrites mclg 1  $(mg/l)^2$ . Sources same as above.

**Frequency.** From municipal sources, obtain a copy of test results at least yearly from your county/municipality and keep it in your files. If you use well water, test at least, once per year during the growing season and more often if you are using well water for for spraying. If you are using surface water, test at least 3 times per year during the growing season. Recommended sampling times include at planting, second at peak use time, and third at or near harvest. Wash and rinse water MUST be potable.

**How to take a water sample.** Contact your county environmental health department or a reputable lab to test your water. Follow their instructions for taking the sample and submitting the sample.

## APPENDIX D Cannabis Waste Composting Protocol

Title 14. Natural Resources Div 7. Dept of resources, recycling, and recovery Chapter 3.1. Compostable materials handling Operations and facilities requirements

- **1. Licensing Requirement** Permit required from the California Natural Resources Agency for any composting facility.
- 2. Operating Procedures Handbook This operating handbook will outline the methods used in facility to perform the composting function. It should detail composting method utilized, locations for compost batches, methods used for moving materials, and proposed turning/temperature recording procedure.
- 3. Designated Location and Space Allocated in Plot Plan State wants site diagram/ plot plan to show locations for all work spaces including composting location. If windrowing compost should consider moving down a hill if hand turning. All designated compost space will need adequate fire clearance due to danger of combustion in compost piles.
- 4. Personnel Training Plan Personnel must be trained in procedures and maintenance, including physical contaminants and hazardous materials recognition and screening, with emphasis on odor impact management and emergency procedures on facility grounds. Will also keep a recorded log of when employees received training and maintained on site.
- **5. Odor Impact Minimization Plan** Site specific plan including odor monitoring and data collection, meteorological conditions affecting odor migration, complaint response, design considerations for method and aeration and moisture, and operating procedures for minimizing odors.
- 6. Pathogen Prevention Process Fecal coliform < 1,000 Most Probable Number per gram of total solids and Salmonella < 3MPN / 4 grams solids. Process is: Enclosed vessels or aerated static pile with insulation layer maintained temperature > 131 F for 3 days, and for windrowing > 131 F for 15 days with compost turned at least 5 times.
- **7. Testing Requirements; metals, pathogens, and physical contaminants** Pathogens are aforementioned, compost meets maximum metal concentrations, and no more than 0.5% by dry weight of physical contaminants greater than 4 millimeters (no more than 20% of this 0.5% shall be film plastic >4mm).
- 8. Record keeping -Facility shall retain for at least 5 years; special occurrences, public complaints, compost batch ie (quantity and type) of feedstock logs, load checks and rejections, serious injuries, all TEST RESULTS. It is clear cut logging.

**APPENDIX E** Pre-existing cannabis prior to state license issuance and close out inventory procedures

## Track-and-Trace System Requirements for Product in Licensee Possession at the Time of Annual License Issuance

- Within thirty (30) business days of receipt of initial UIDs ordered, the licensee shall enter into the track-and-trace system and assign and apply a UID to each <u>pre-existing</u> immature plant lot, each individual mature plant, and all nonmanufactured cannabis products physically located on the licensed premises.
- 2) After the thirty (30) day time frame referenced in subsection (a) above expires, all cannabis at the licensed premises shall be entered into the track-and-trace system starting with seed, clone propagated onsite or purchased from a licensed nursery, or seedling purchased from a licensed nursery

#### Close out of physical inventory instructions

Licensee's shall close-out their physical inventory of all cannabis and non-manufactured cannabis products, and UIDs, if applicable prior to the effective date of any of the following changes to their license:

- (1) Voluntary surrender of a temporary license or annual license.
- (2) Expiration of an annual license.
- (3) Revocation of a license.

Close-out of physical inventory includes, but is not limited to, all of the following items:

- (1) Immature plants and their corresponding lot UID(s);
- (2) Mature plants and their corresponding plant UID(s);
- (3) Harvest batches and their corresponding UID(s);
- (4) Non-manufactured cannabis products and their corresponding UID(s); and

(5) UIDs in the licensee's possession which have not been assigned in the track-and-trace system.

## APPENDIX F Log Sheets, Invoice, & Shipping Manifest

Planting Events Log

Harvest Events Log

Harvest Tote/Tool Cleaning Log

Processing line cleaning log

Packaging Events Log

Cannabis Release Log

Sales Invoice / Sales Receipt

**Shipping Manifest** 

Transport vehicle inspection cleaning log

Water source testing log

Pest and rodent control log

Field Sanitation Unit Service Log

Fence Perimeter and Field Inspection Log

Employee Training Log

Illness and injury report form

First Aid Kit Log

Restroom cleaning log