Cultivation and Operations Manual
For
New Earth Farms, LLC

APN: 524-072-010

Proposed Commercial Cannabis Cultivation Facilities

Lead Agency:
Humboldt County Planning Department
3015 H Street
Eureka, CA 95501

Prepared By:

NORTHPOINT
CONSULTING GROUP, INC.

In Consultation with:
New Earth Farms, LLC
PO Box 153
Willow Creek, CA 95573

December 2022

New Earth Farms, LLC
Cultivation and Operations Manual – 2.0
Humboldt County, CA

Commercial Cannabis
Cultivation Facilities

Prepared For:

TABLE OF CONTENTS

1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

New Earth Farms, LLC ("Applicant") is proposing to permit commercial cannabis cultivation activities in accordance with the County of Humboldt's (County) *Commercial Cannabis Land Use Ordinance* (CCLUO), aka "Ordinance 2.0" on APN 524-072-010 in Willow Creek, CA.

The applicant has an approved project for 10,000 sf of mixed light cultivation (PLN-12260-CUP). The project requires a Special Permit to add 32,500 sq. ft., thus increasing onsite cultivation to 42,500 sq. ft. of mixed-light cultivation. The project also includes approval of ancillary nursery and drying activities. The project includes the permitting of proposed facilities appurtenant to the cultivation. The applicant aims to become fully compliant with State and Local cultivation regulations.

Table 1.1 Summary of Cannabis Applications

Approved 1.0 Application (PLN-12260-CUP)	Proposed 2.0 Application Changes
• 10,000 sf of mixed light cultivation with 1,000 sf ancillary nursery. • The primary water source for cultivation purposes is rainwater catchment. • Single-story 2,400 sf commercial drying building and processing building with ADA Bathroom. • Power is provided by PG&E	• Up to a total 42,500 sf of mixed-light cultivation (including the 10,000 sf of mixed light cultivation from 1.0 Application) and 3,000 sf ancillary nursery. • The primary water source for cultivation purposes is rainwater catchment totaling 600,000 gallons. • The applicant will no longer be pursuing a processing building. Processing will occur off-site. The proposed 2,400 sf building will just be for drying and will be ag-exempt rather than commercial. • Power is to be sourced through PG&E with the "100% Solar Choice" or the "RCEA Power+" plan (or similar) to ensure all energy required for the project is sourced from renewable energy.

1.2. SITE DESCRIPTION

The Project is located off Friday Ridge Road, south of the town of Willow Creek, CA (APN 524-072-010). The subject parcel is approximately 30 acres in size (Humboldt County Web GIS) and has undulating topography with slopes between 5% and 35%. The cultivation operation is centrally located on the parcel and occupies a large, naturally flat meadow where average slopes are less than 5%. Vegetation consists of open grasslands mixed with oak woodlands, manzanitas and mixed conifer, deciduous and riparian forest. The soils within the developed portion of the parcel consist predominantly of Holland-Goldridge (5-35% slopes) which are well-drained gravelly-loam soils.

Two existing buildings are located in the central portion of the property, a barn and a residence. The barn (approximately 1,600 sf) is located adjacent to an existing pond. The residence (approximately

1,900 sf) is located on the eastern edge of the central portion of the property. Both buildings predate available aerial imagery as per *Google Earth Pro*, (August 1988). Prior to January 1, 2016, there was approximately 10,000 sq. ft. of cannabis cultivation existing on-site located in one central cultivation area. The cultivation area is a naturally benched flat with mild topography and natural slopes between 5% and 10%. All cultivation occurs outside of riparian setbacks.

1.3. Land Use

The subject property has a General Plan designation of RA40 (Residential Agriculture) as identified by the Humboldt County General Plan and is zoned Unclassified (U). Land uses surrounding the parcel are similarly comprised of Residential Agriculture, Timber, U.S. National Forest Service lands and unclassified general plan designations. The surrounding parcels are zoned Residential Agriculture (RA) and Timber Production Zone (TPZ).

1.4. State and Local Compliance

1.4.1. State of California Commercial Cannabis Activity License

New Earth Farms, LLC will obtain Annual Cannabis Cultivation Licenses for the proposed cultivation through the Department of Cannabis Control - California.

1.4.2. State Water Resources Control Board

The operation will source irrigation water from a rainwater catchment system. The water storage tanks will be plumbed to existing and proposed structures that will serve as catchment surfaces. Rainwater catchment is exempt from the State Water Resources Control Board's (SWRCB) permitting authority over appropriations of water, and no water rights are required.

1.4.3. North Coast Regional Water Quality Control Board

Effective June 26th, 2019, Michael Bobillot (of New Earth Farms, LLC) enrolled with the North Coast Regional Water Quality Control Board (NCRWQCB) for coverage under Tier 2 of Order No. 2015-0023 *Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region* (WDID Number 1B171453CHUM).

Following this, New Earth Farms, LLC transitioned to coverage under the State Water Resources Control Board General Order WQ 2019-0001-DWQ Cannabis General Order and Policy. The transition occurred prior to July 1, 2019. Additionally, a Site Management Plan was developed by NorthPoint Consulting and has been furnished to the North Coast Regional Water Quality Control Board (WDID 1_12CC419050).

1.4.4. Humboldt County 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 Conditional Use Permit.

1.4.5. 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 requirement from property lines. If required by Cal Fire, a 2,500-gallon water tank with a riser to SRA specifications will be installed for firefighting purposes.

1.4.6. California Department of Fish and Wildlife

The applicant submitted a Lake and Streambed Alteration (LSA) Notification in May 2019. The LSA Notification included four jurisdictional items (a stream crossing, shallow well, point of diversion for domestic purposes, and pond outlet) and two non-jurisdictional information items (ditch relief culvert and groundwater well). A Final Streambed Alteration Agreement was issued on September 13th, 2019 (Notification No. 1600-2019-0376-R1).

1.4.7. Cultural Resources

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

2.1. Propagation and Mixed Light Cultivation

Juvenile plants will be propagated in an onsite nursery comprised of a hoop house located in the main cultivation area. The ancillary nursery greenhouse consists of a 30' x 100' frame for a total of 3,000 sf, less than 10% of the total cultivation area. Juvenile plants will be propagated on site from 'mother plants' that demonstrate the desired genetics for the specific cannabis strain. Mother plants remain in the vegetative stage solely for propagation. Cuttings are sampled from the mother plants and are rooted into a growing medium, typically oasis cubes, to produce 'clones.' The clones are placed into the nursery, and once fully rooted they are transplanted directly into one (1) gallon plastic containers. The juvenile plants are irrigated using hand watering methods. After 2-4 weeks the clones are then transplanted into raised beds within the flowering greenhouses. When required, artificial lights will be utilized in conjunction with natural light to maintain a photoperiod sufficient to prevent the juvenile plants from flowering. The mixed light cultivation will occur in eighteen (18) greenhouses, for a combined cultivation area of approximately 42,500 square feet (sf). The greenhouses consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each greenhouse is ventilated by intake and exhaust fans, the greenhouses utilize a combination of natural light, artificial light, and light deprivation to produce up to three (3) flowering cycles per year.

New Earth Farms, LLC uses small incandescent lights to extend the growing season. Greenhouses vary between 0.33 watts per square foot to 0.45 watts per square foot with lights range between 85-watt bulbs to 150-watt bulbs. Black out tarps will be used to achieve both light deprivation and Dark Sky standards. Any greenhouse or propagation area with supplemental lighting will be properly maintained by shielding so little to no light escapes. Light shall not escape at a level this is visible from neighboring properties between sunset and sunrise. The cultivation schedule details the cultivation, fertilization, and irrigation practices associated with the for a three-cycle year, typical for New Earth Farms, LLC.

2.2. Irrigation Plan and Schedule

Irrigation and fertigation of plants occurs using drip irrigation and some top-feed hand watering methods as appropriate. While most irrigation needs are on automatic drip, some irrigation and

fertigation is more efficiently managed via 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.

2.3. Processing Plan (Harvesting, Drying, and Trimming)

The applicant proposed to construct a 2,400-sf drying and processing facility under approved PLN-12260. The applicant is no longer proposing the 2,400-sf drying and processing facility. Processing will occur off-site. Drying is proposed to occur in a 2,400-sf ag-exempt drying building that was originally proposed for processing. Plants that are ready for harvest have their flowering branches removed and suspended in a proposed drying room which is equipped with ventilation fans.

Applicable state cultivation licenses will be obtained once local authorization has been granted. All product will be tracked and weighed in accordance with County and State regulations, and all data will be entered into the California Cannabis Track-and-Trace (CCTT) METRC system.

2.4. Light Pollution Control Plan

Black out tarps will be used to achieve both light deprivation and Dark Sky standards. Any greenhouse or propagation area with supplemental lighting will be properly maintained by shielding so little to no light escapes. Light shall not escape at a level this is visible from neighboring properties between sunset and sunrise.

2.5. Employee Plan

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

2.5.1. Job Descriptions And Employee Summary

- *Agent in Charge*: Responsible for business oversight and management. 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*: Oversight and management of the day to day cultivation of commercial cannabis. Responsibilities include but are not limited to plant propagation and transplanting, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.
- *Assistant Cultivator:* Provides support to the *Lead Cultivator* in their day to day duties and takes the lead role during times when the *Lead Cultivator* may be off site.
- Seasonal Laborer: Provides cultivation, harvesting, and drying support. This is a part-time to full-time, seasonal position.

2.5.2. Staffing Requirements

In addition to the *Agent in Charge, Lead Cultivator, and Assistant Cultivator positions,* up to three (10) full-time seasonal labor positions are employed. The number of seasonal laborers varies based on the needs of the farm during the cultivation, harvest and processing seasons. During the peak harvest and processing season, there are an estimated total of thirteen (13) seasonal employees on site.

2.5.3. Employee Training and Safety

On site cultivation, harvesting and drying is performed by employees trained on each aspect of the procedure, including cultivation and harvesting techniques, use of pruning tools, proper

application/storage of pesticides/fertilizers. All cultivation 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.

2.5.4. Toilet and Handwashing Facilities

The applicant is proposing to permit the existing septic system attached to the existing single-family residence.

During the interim, employees will utilize portable toilets, which will be regularly serviced as required by a qualified professional. Anti-bacterial Liquid Soap and paper hand towels will be made available. Employees will work at a distance typically no greater than 500 feet from the restroom facility.

2.5.5. Housing

The Lead Cultivator and Assistant Cultivator will live at the existing single-family residence on site. All other full-time and seasonal employees live off site and commute daily to the cultivation site.

2.5.6. Parking Plan

The Lead Cultivator and Assistant Cultivator will live at the existing single-family residence on site. All other full-time and seasonal employees live off site and commute daily to the cultivation site.

2.6. Security Plan and Hours of Operation

2.6.1. Facility Security

Parking is proposed to be located adjacent to the central cultivation area. A total of 13 parking spaces are proposed.

2.6.2. Hours of Operation

Activities associated with cultivation (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities including harvesting and drying-related labor typically occur no earlier than 8 AM and extend no later than 8 PM.

3. ENVIRONMENT

3.1. Water Source and Projected Water Use

Water for irrigation purposes will be provided by rainwater catchment. Based on an area of 42,500 sf of mixed-light cannabis cultivation, the estimated annual demand is approximately 595,000 gallons of water.

Water for domestic use is proposed to be sourced from an existing well, treated rainwater catchment, or delivered to the site. This well is unrelated to the proposed project. No diversionary or groundwater sources are proposed for this project.

Table 3.1 below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will affect water use rates.

Table 3.1: Annual Irrigation Demand											
Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
			28,161	51,203	52,107	102,405	145,388	140,698	75,039		

Total = 595,000 gallons

3.2. Water Storage

This site currently has 17,500 gallons of storage in the form of rigid plastic water tanks, one (1) 5,000-gallon tank and five (5) 2,500-gallon tanks. The applicant is proposing to install a 500,00-gallon rainwater catchment tank and a 100,000-gallon rainwater catchment tank for a total of 600,000 gallons. The applicant intends to build out storage in order to meet storage needs as applicable.

3.3. Rainwater Catchment Analysis

Water is proposed to be sourced from captured rainfall. The following calculations demonstrate the rainfall capture and storage potentials for the project. Data from PRISM Climate Group was used for calculations (https://prism.oregonstate.edu/explorer/). The PRISM Climate Group provides site-specific average monthly and annual rainfall data based on topography and historic precipitation values. Data was sourced from years 2000 – 2021 to get an accurate representation of recent rainfall data and account for lighter rainfall years. The highest precipitation year on record for the project site was 70.57 inches in 2005, the lowest rainfall year was 19.13 inches in 2013, and the average over the last 21 years was 50.78 inches. The 2013 precipitation amount of 19.13 inches is the lowest recorded rainfall on record for the area since 1900.

Existing and proposed onsite buildings will be plumbed to the proposed tanks to increase catchment surface area. At full build-out, including all existing and proposed structures total capture area is 52,599 sf. The capture efficiency of the rooftops is estimated to be approximately 98% due to potential breaks in the guttering or other unforeseen complications, and the capture efficiency of the rainwater catchment tanks are estimated to be 100%.

In an average rainfall year, the proposed catchment area has the potential to capture approximately 1,635,087 gallons of rainwater, greater than the 595,000 gallons of projected demand. In conclusion, on an average rainfall year, there is greater than adequate rainfall to provide sufficient water demand for the proposed project (Table 3.2)

Table 3.2: Summary of Rainwater Catchment Analysis during an Average Rainfall Year				
Catchment Surface	Catchment Area (sf)	Catchment Volume (ft^3)	Catchment Volume (gal)	Amount Captured with 98% Efficiency (gal)
Proposed Drying Building	2,400	10,156	75,968	74,448
Residence	1,737	7,350	54,982	53,882
500k Rainwater Catchment Tank	4,300	18,196	136,109	136,109
100k Rainwater Catchment Tank	1,662	7,033	52,608	52,608
Greenhouses	42,500	179,847	1,345,259	1,318,354
			Total Capture Volume (gal) =	**1,635,400**

During a drought rainfall year, using data from 2013, the proposed catchment area has the potential to capture approximately 616,087 gallons of rainwater (Table 3.3). This is greater than the expected project demand.

Table 3.3: Summary of Rainwater Catchment Analysis during a Drought Rainfall year

Catchment Surface	Catchment Area (sf)	Catchment Volume (ft^3)	Catchment Volume (gal)	Amount Captured with 98% Efficiency (gal)
Proposed Drying Building	2,400	3,826	28,618	28,046
Residence	1,737	2,769	20,713	20,298
500k Rainwater Catchment Tank	4,300	6,855	51,275	51,275
100k Rainwater Catchment Tank	1,662	2,650	19,818	19,818
Greenhouses	42,500	67,752	506,786	496,650
			Total Capture Volume (gal) =	**616,087**

Therefore, the existing and proposed surfaces and water storage would capture enough rainwater to support the project during both an average and a drought rainfall year.

3.4. Site Drainage, Runoff, and Erosion Control

Michael Bobillot of New Earth Farms, LLC has enrolled for coverage under the General Order (Order No. 2019-0001-DWQ) and a Site Management Plan has been developed utilizing Best Practicable Treatment and Control (BPTC) measures in accordance with Attachment A of the Order. The drainage and erosion control measures described below will be addressed in the SMP.

3.4.1. Site Drainage and Runoff

Site investigation for the development of the Site Management Plan (SMP) showed some evidence of surface runoff associated with historic developments and deferred road maintenance. Except for the historic barn (to be removed), all existing and proposed structures will be located outside of riparian buffer zones and Streamside Management Areas, providing a sufficient buffer to prevent sediment and nutrient delivery. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented. These include the use of drip irrigation to prevent excessive water use and the maintenance of a stable, vegetated buffer between the cultivation area riparian zones.

3.4.2. Erosion Control

The Site Management Plan (SMP) includes erosion and sediment control BPTCs designed to prevent, contain, and reduce sources of sediment. The SMP also includes corrective actions to reduce sediment delivery, including maintaining roads, replacing culverts, and revegetating areas of disturbance. Drainage management solutions are also provided in the SMP which include recommendations for inboard ditches, ditch relief culverts, sediment capture basin and french drains. Additionally, the SMP requires mulch piles and spoils from any grading to be stored in a designated location away from watercourse.

3.5. Watershed and Habitat Protection

Adherence to the SMP ensures that the watershed and surrounding habitat are protected. The cultivation activities and associated structures are greater than feet from the nearest surface waters, an ephemeral Class III drainage which lies upslope of the cultivation area. This setback distance in conjunction with a subgrade location provides a suitable buffer between the cultivation operation and potential habitat. Additionally, site development and maintenance activities utilize BPTC measures in accordance with the State Water Resources Control Board's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits and the SMP.

3.6. Invasive Species Control Plan

As described above, the parcel has historically been utilized for ranching and livestock activities for decades and is currently being grazed by horses and cattle. Once proposed cultivation activities commence, the cultivation areas will be monitored for invasive species. If invasive species are located, mechanical removal of invasive species will be implemented. Mechanical removal may include hand tools, shovels, weed wrenches, trowels, or hand saws, and will occur annually in the spring as needed. The exact rate and method of invasive species will be determined by the species identified. Plants such as Scotch broom (*Cytisus scoparius*) and yellow starthistle (*Centaurea solstitialis*) are common in the area and will be removed if identified.

The following is a partial list of websites to be used for proper identification and treatment:

1. https://calflora.org//
2. https://plants.usda.gov/java/
3. https://www.cal-ipc.org/
4. https://www.cal-ipc.org/solutions/
5. http://www.rareplants.cnps.org/
6. https://www.wildlife.ca.gov/Conservation/Plants#22064102-california-native-plant-information
7. http://ucjeps.berkeley.edu/
8. http://wetland-plants.usace.army.mil/nwpl_static/v33/home/home.html
9. https://www.fws.gov/invasives/partnerships.html

3.7. Monitoring and Reporting

Monitoring will be conducted to confirm the effectiveness of corrective measures listed in the SMP and determine if the site meets all of the BPTC Measures as per Attachment A of the Order. The Site Management Plan provides more details regarding Monitoring and Reporting. New Earth Farms, LLC. staff track all water use and maintain accurate records of fertilizer applications. This information will be reported annually to the State Water Resources Control Board by March 1st of each year.

3.8. Energy Plan and Generator Use

The parcel is grid tied and features a power drop from PG&E. New Earth Farms, LLC is working with PG&E, a licensed electrician and an electrical engineer to develop the site infrastructure for additional power delivery to ensure that available power is sufficient for the intended and desired production capacity of the farm. Generators are kept on-site for power back up in the event of an emergency or a PG&E power shut off. Use of the generator will follow all guidelines set by Humboldt County and the State of California. In the event that the use of a generator is required, it shall be placed so as to ensure that the noise level does not exceed 60 decibels at the property line. The generator and

gasoline fuel are located within a secondary containment trough and stored under cover from the elements.

3.9. Materials Management Plan

The applicant will use legal agricultural chemicals consistent with cannabis operations, including fertilizers, compost, pesticides, fungicides, and herbicides. Examples of fertilizers and pesticides used onsite include General Hydroponics 3 part base (FloraGro, FloraMicro, and FloraBloom), and Marrone Bio (Regalia, Venerate).

On-site inventory is kept for all chemicals. Agricultural are used and stored based on manufacturer's recommendations and requirements. Any materials required for use of chemicals will be provided to employees. The material safety data sheets (MSDS) are kept on site and accessible to employees.

Petroleum products, including gasoline, diesel, and lubricants, are currently kept on site in small quantities (e.g., 5-gallon containers) for use in small equipment (e.g., weed whacker). Petroleum products will be stored within the proposed buildings and will be kept in secondary containment. No hazardous waste is proposed to be generated onsite; all major equipment fuel changes will occur offsite at a licensed facility. A spill kit with sorbent pads will be accessible onsite in the event of a spill. Cultivation, harvesting, and drying shall be performed by employees trained on each aspect of the procedure, including cultivation and harvesting techniques, the use of pruning tools, and proper application/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, drying and processing facilities are limited to authorized and trained staff. Mixing of fertilizers in small storage tanks is solely conducted in a designated area where the mix will not enter surface waters. For young plants, the mix is applied via watering wand and mature plants are fertigated at agronomic rates by drip emitters or hand watering methods. Spent soil is amended and reused as needed. The application of any agricultural chemical products will be conducted according to the manufacturer's recommendation.

Employees are trained on usage and handling procedures of associated equipment and cleaning procedures. Chemicals and hazardous materials are only used with equipment as recommended by manufacturers. Cleaning will occur regularly with instructions based on the manufacturer's recommendations. All cleaning materials will be put away and stored properly within secondary containment when not in use and hazardous containers will be properly disposed of.

All hazardous waste will be stored within secondary containment. Additionally, a log will be kept in order to keep the volume of hazardous waste accounted for. Fertilizers and pesticides are being stored in a separate location from petroleum products. The aforementioned products will be located within secondary containment in the proposed drying facilities. No rodenticides will be used on site. At the end of the season, any unused liquid products are stored in secondary containment and will be applied the following year. Before unused products are stored at the end of the season, an employee will take inventory on the volumes and products. Additionally, all waste will be properly disposed of off-site and the correct facility. All trash, empty product containers, and recycling are hauled off-site bi-weekly to nearest licensed waste management facility, Recology Eel River.

Appropriate BPTC measures are being utilized when storing, handling, mixing, applying, and disposing of all fertilizers, pesticides, herbicides, rodenticides, or any other hazardous materials. Each year an inventory is conducted prior to the beginning of the grow season and necessary products are delivered to the site as needed.

3.10. Waste Management Plan

3.10.1. Solid Waste Management

Trash and recycling containers are located outside the existing residential building and are enclosed within a secure area to prevent animal intrusion. Solid wastes and recycling are hauled off-site to the nearest resource recovery transfer station on an as needed basis, typically once per week.

3.10.2. Cultivation Waste and Soil Management

Cultivated vegetative matter such as root balls, branches and leaves are composted at a designated area. Spent potting soil is stored in a designated contained and covered area that is lined to prevent any soil erosion or nutrient seepage. Soils are analyzed using industry standard soil testing procedures and after consultation are amended and reused. Any used pots will be collected and stored in a designated storage area for the winter. All packaging from soil amendments and fertilizers will be collected and disposed at an appropriate waste disposal facility.

3.10.3. Hazardous Waste Statement/Site Assessment

The site has been historically utilized for cultivation and as a residence. No industrial activities have occurred on site. A search of the EnviroSTOR database shows no GeoTracker Cleanup Programs onsite and the site receives the lowest score from CalEnviroScreen.

3.10.4. Sewage Disposal Plan

Employees with have access to the bathroom int the main residence. During the interim, portable toilet will be brought to the site.

3.10.5. Wastewater Management

The water management plan aims to achieve an entirely closed-cycle irrigation and nutrient system. Hand watering and drip irrigation methods minimize the over-irrigation of plants and subsequent runoff.

4. PRODUCT MANAGEMENT

4.1. Product Testing and Labeling

Samples will be selected from individual harvested cannabis strains and tested by a licensed third-party lab in accordance with State and local standards. The finished product is labeled and will include tracking ID's provided by the California Cannabis Track-and-Trace (CCTT) METRC system.

4.2. Product Inventory and Tracking

The applicants will follow all regulations and requirements set by the CCTT-METRC system. After approval of state licenses related to the proposed cultivation, the applicants will request credentials and order unique identifiers (UIDs) which will be assigned to each immature lot, flowering plant, and distinct cannabis product.

4.3. Transportation and Distribution

Transportation will be handled by a licensed transporter/distributer in accordance with State and Local regulations. All merchantable product will be distributed through licensed commercial cannabis dispensaries. The CCTT-METRC system will be used for all transactions with distributors or transporters.

Appendix A: Site Plan