CULTIVATION AND OPERATIONS PLAN

ORGANIC LIBERTY CA, LLC

OUTDOOR, MIXED-LIGHT, AND LIGHT DEPRIVATION CULTIVATION AND DISTRIBUTION, MANUFACTURING, PROCESSING AND NURSERY FACILITY

Applicant:

Organic Liberty, LLC
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COMPASS LAND GROUP

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1.0 GENERAL OPERATIONAL INFORMATION

1.1 Contact Information

Name: Organic Liberty CA, LLC ("Operator" or "Employer")
Contact: Matthew Primm
Contact Address: P.O. Box 94825, Las Vegas, NV 89193
Phone Number: 858.245.3277

1.2 Facility Location

The facility is located approximately four (4) miles south/southeast of the community of Willow Creek near the junction of State Highway 299 and Friday Ridge Road in an unincorporated area of Humboldt County, California.

1.3 Staffing & Staff Screening Processes

It is anticipated that the facility will require up to 20 full-time equivalent employees ("FTE") and 20 additional seasonal employees depending on operational demands. All candidates for staff positions will undergo criminal background checks as part of the standard screening process (to the extent allowed by law). To the maximum effect allowed by California and federal employment law, candidates with a felony criminal history or a history of drug abuse will be screened from employment.

1.4 Vehicle Trips

The combination of employee trips, deliveries, and other traffic is anticipated to result in up to forty-five (45) round trips per day depending upon the season and stage of development.

1.5 Days and Hours of Operation

The facility is not open to the public and will not accept visitors without a specific business purpose. Hours of operation will typically be from 7:00 AM to 7:00 PM; however, during periods of seasonally high workload, the hours of operations within the facility may increase to sixteen (16) hours per day (5:00 AM to 9:00 PM). In addition, further extended hours may be required for select employees during peak production seasons to manage greenhouse and nursery facilities.

1.6 Agricultural Employer Statement

Pursuant to the Medicinal and Adult Use Cannabis Regulation and Safety Act ("MAUCRSA"), Health and Safety Code section 19322(a)(9), the Operator hereby declares that it is a an 'agricultural employer,' as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor

Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law."

1.7 County Access

All facility personnel will cooperate fully with the County, its agents, and employees, to grant access to the facility to seek verification of the information contained within the permit, permit applications, the Operations Plan, and the Operating Standards at any time before or after the permits are issued. The Humboldt County Sheriff's Department will be authorized to have access to the facility's security surveillance video.

1.8 Employee/Worker Safety

Pursuant to Labor Code Sections 1140-1166.3, the Employer hereby agrees to comply with all applicable federal, state, and local laws and regulations governing California agricultural employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

With respect to employees engaging in commercial cannabis cultivation, nursery, processing, distribution, and non-flammable manufacturing related activities, the Employer will comply with the following Employee Safety Practices:

1.8.1 Job Specific Safety Protocols and Training

- Emergency action response planning;
- Employee accident reporting and investigation policies;
- Fire prevention;
- Hazard communication policies, including maintenance of material safety data sheets (MSDS);
- Materials handling policies;
- Job hazard analyses; and
- Personal protective equipment policies, including respiratory protection.

1.8.2 Emergency Contact List

The Employer will visibly post and maintain an emergency contact list which includes at a minimum:

- Operation manager contacts;
- Emergency responder contacts; and

- Poison control contacts.

1.8.3 Safe Drinking Water

At all times, employees will have access to safe drinking water. Consistent with existing conditions, drinking water for site employees will be provided through bottled water or through a water delivery service.

1.8.4 On-Site Housing

There is no intent to provide on-site housing to workers at this time. On site-housing provided to employees, if any, will comply with all applicable federal, state, and local laws and regulations.

1.9 Consumer Health and Safety

1.9.1 Food Safety Training

The Operator will ensure applicable employees have successfully passed an approved and accredited food safety certification examination as specified in Sections 113947.2 and 113947.3 of the California Retail Food Code. Food safety certification will be achieved by successfully passing an examination from an accredited food protection manager certification organization. The certification organization will be accredited by the American National Standards Institute as meeting the requirements of the Conference for Food Protection's "Standards for Accreditation of Food Protection Manager Certification Programs."

1.9.2 Facility Inspection

The facility will accommodate inspection of the commercial cannabis cultivation area by the local fire department, building inspector, or code enforcement officer to confirm that no health or safety concerns are present. It is understood that the inspections may result in additional specific standards to meet local jurisdiction restrictions related to commercial cannabis.

1.9.3 Sanitary Conditions

The facility will take reasonable measures and precautions to ensure the following:

- That any person who, by commercial examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with commercial cannabis will be excluded from any operations which may be expected to result in contamination until the condition is corrected;
- Hand washing facilities will be clean, functional, and be furnished with running water. Hand washing facilities shall be located in close proximity to where good sanitary

practices require employees to wash or sanitize their hands, and provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;

Persons working in direct contact with commercial cannabis will conform to hygienic practices while on duty, including but not limited to:

- Maintaining adequate personal cleanliness;
- Washing hands thoroughly in an adequate hand washing area(s) before starting work and at any other time when the hands may have become soiled or contaminated;
- Refraining from having direct contact with commercial cannabis if the person has or may have an illness, open lesion(s), including boils, sores, or infected wounds, or any other abnormal source of microbial contamination, until such condition is corrected;
- That waste is properly removed and the operating systems for waste disposal are maintained in an adequate manner so that they do not constitute a source of contamination in areas where cannabis is exposed;
- That there is appropriate lighting in all areas where commercial cannabis is stored, and where equipment or utensils are cleaned;
- That there is adequate screening or other protection against the entry of pests. Rubbish will be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage, or breeding place for pests;
- That facilities are maintained in a sanitary condition;
- That chemicals will be identified, held, stored and disposed of in a manner that protects against contamination of cannabis in a manner that is in accordance with any applicable local, state or federal law, rule, regulation or ordinance;
- That operations will be conducted in accordance with good sanitation principles;
- That employees are provided with adequate and readily accessible toilet facilities that are maintained in a sanitary condition and good repair; and
- That any cannabis or cannabis waste that can support the rapid growth of undesirable microorganisms are held in a manner that prevents the growth of these microorganisms.

1.10 General Product and Inventory Management

The facility's inventory control process includes tracking of all incoming and outgoing seedlings, bulk cannabis and manufactured cannabis, and finished cannabis and manufactured cannabis products through the State's Marijuana Enforcement Tracking Reporting Compliance (METRC) system. The State's METRC system and associated manifests include information on all cannabis related product such as the name and state license number of all licensees (shipper, distributor, and receiver), shipping dates and times, finished cannabis product testing lab data (as applicable), strain, product type, and batch identification. The METRC system will also reflect inventory quantities and locations as they relate to State license number. All plants, cannabis, and cannabis

products will be assigned a unique RFID tag that can be cross-referenced to the above referenced data and stays with the product through the cultivation, harvesting, processing, manufacturing, packaging, testing, distribution, and to final sale to authorized customers.

In addition, the Operator will utilize an internal inventory tracking software, which will keep track of data such as costs, vendor information, strains, quantities, batch information, R&D testing information, dry good inventories, and other operationally important data.

The methodologies for tracking and inventory control of commercial cannabis may be modified subject to requirements imposed by the County or the Department of Cannabis Control and will be adjusted accordingly as required under law.

1.10.1 Customer Screening, Registration, and Validation Process and Procedures

All products will be sold to state licensed facilities. The facility will not be open to the public and will not accept visitors without a specific pre-authorized business purpose. Only authorized representatives of state licensed customer facilities and appropriately licensed vendors will be allowed to enter the facility and be in close proximity to commercial cannabis, but in all cases supervised at all times. Any other vendors or maintenance workers allowed in the facility will be at all times escorted and sequestered from the finished products and harvested materials.

2.0 CULTIVATION PLAN

Pursuant to the definitions of Humboldt Ordinance No. 2599 ("Ordinance 2.0"), cultivation activities at the facility include ±2.4 acres of open-air outdoor cultivation within raised cultivation beds or a suitable equivalent (e.g., pots), ±0.7 acre of enclosed outdoor light deprivation within hoop houses, and ±0.9 acres of enclosed mixed-light cultivation within greenhouses. Clones and seedlings for cultivation will primarily be supplied by the new ±3,150 square foot commercial nursery; however, the Operator may source genetic inventory from licensed off-site vendors to diversify its cultivation inventory. Artificial lighting will be utilized both in the mixed-light cultivation greenhouses and the commercial nursery to allow for seasonal control of the plants' vegetative and reproductive growth cycles. A description of the anticipated typical cultivation cycles by type is described below in **Table 1, Cultivation Cycles**.

TABLE 1
CULTIVATION CYCLES

Cultivation Type	No. of Cycles	General Cultivation Cycle
Nursery	N/A	Year Round
Open-Air Outdoor	1	June - November
Light-Deprivation	2 to 3	April - November
Mixed-Light	4	Year Round

2.1 Schedule of Cultivation Activities

Cultivation related activities will include tending to mother plants, cloning/propagation of plants for cultivation stock, preparation for planting (i.e. bed and pot preparation), planting seeds and immature plants in raised cultivation beds and pots, plant care (i.e. irrigation, fertigation, drawing shade curtains for light cycles, etc.), and harvesting of finished plants. A schedule for cultivation related activity is detailed below in **Table 2, Typical Schedule of Cultivation Activities**. This schedule is provided as a general description of cultivation activities, and is subject to change based on market demands, operational requirements, and seasonal weather.

TABLE 2

TYPICAL SCHEDULE OF CULTIVATION ACTIVITIES

Month	Cultivation Activities
January	-Mixed-Light: • Start of 1st cycle for the year -Nursery: • Clone, propagation, vegetation, & breeding
February	-Mixed-Light: • Fertigation and irrigation -Nursery: • Clone, propagation, vegetation, & breeding
March	-Mixed-light: • Harvesting 1st cycle • Prep and begin 2nd cycle -Light-deprivation: • Preparation for 1st cycle • Maintenance of automated systems -Outdoor: • Maintenance of raised beds and irrigation system -Nursery: • Clone, propagation, vegetation, & breeding
April	-Mixed-light: • Flowering -Light-deprivation: • Plant 1st cycle -Outdoor: • Site preparation for planting • Farm maintenance -Nursery: • Clone, propagation, vegetation, & breeding
May	-Mixed-light: • Fertigation and irrigation -Light-deprivation: • Vegetation -Outdoor: • Fertigation and irrigation • Amend raised beds -Nursery: • Clone, propagation, vegetation, & breeding

June	-Mixed-light: • Harvest 2nd cycle • Prep for 3rd cycle -Light-deprivation: • Start 2nd cycle -Outdoor: • Fertigation and irrigation -Nursery: • Clone, propagation, vegetation, & breeding
July	-Mixed-light: • Start of 3rd cycle -Light-deprivation: • Harvest • Amend beds • Plant 2nd cycle -Outdoor: • Vegetation -Nursery: • Clone, propagation, vegetation, & breeding
August	-Mixed-light: • Fertigation and irrigation -Light-deprivation: • Vegetation -Outdoor: • Vegetation -Nursery: • Clone, propagation, vegetation, & breeding
September	-Mixed-light: • Harvest 3rd cycle • Prep for 4th cycle -Light-deprivation: • Vegetation • Flower -Outdoor: • Flower • Harvest preparation • Harvest -Nursery: • Clone, propagation, vegetation, & breeding
October	-Mixed-light: • Start of 4th cycle -Light-deprivation: • Harvest -Outdoor: • Harvest -Nursery: • Clone, propagation, vegetation, & breeding

November	-Mixed-light: • Fertigation and irrigation -Light-deprivation: • Finish harvesting 2nd cycle • Winterization and maintenance of structures -Outdoor: • Finish harvesting • Winterization of raised bed areas • Site cleanup -Nursery: • Clone, propagation, vegetation, & breeding -General: • Farm maintenance and site winterization for wet season • Composting of plant wastes
December	-Mixed-light: • Harvest 4th cycle • Prep for 1st cycle of the new year -Nursery: • Clone, propagation, vegetation, & breeding

2.2 Pest Management Plan

The Operator will implement a Pest Management Plan focused on long-term management and/or suppression of unwanted pests using cultural, biological, and chemical control measures.

2.2.1 Pest Management Practices

Several Integrated Pest Management (IPM) practices will be employed by the facility to ensure optimal growing conditions for the plants. Techniques include focusing on the long-term prevention of pests and their damage by using a varied combination of strategies such as pest resistant strains, beneficial insects, and modification of cultivation practices when needed. Prevention is a much better option than perpetual treatment of an existing infestation.

The following products may be used as biological controls:

TABLE 3
LIST OF BIOLOGICAL CONTROL PRODUCTS

Product Name	Active Ingredient(s)
Nemashield	Steinernema feltiae
OG Biowar Foliar Pack	Bacillus, Beauveria, Metarhizium, Verticillium, Rhodospirillum
OG Biowar Root Pack	Pseudomonas Flourescens, Bacillus, Trichoderma, Streptomyces

No chemical insect or rodent baits will be used inside the cultivation area. If mechanical traps are used, they will be inspected at least weekly - live traps are checked daily or as needed. Contents of traps are emptied into a separate trash bag that is tied and placed into waste containers located outside. Traps will be cleaned periodically and inspected and tested to ensure they are functioning properly.

If used, imported cannabis clones will be inspected for evidence of infestation. Clones will be rejected if evidence of infestation is found.

Each type of infestation has its own treatment regimen that must be swiftly and comprehensively applied in order to work properly. The sooner an infestation is found, the easier it is to contain. Certain pests are common and easy to handle, such as fungus gnats or caterpillars, whereas others will change the process of the daily operations for a period of time, until they are controlled or eliminated. These include mites of all kinds, some types of aphids, and also powdery mildew.

2.2.2 Pesticides

The Operator will use no pesticides prohibited by federal, state, or local law and will comply with all applicable federal, state, and local laws regarding use and disposal.

The following list of pesticide products may be used:

TABLE 4
LIST OF PESTICIDE PRODUCTS AND ACTIVE INGREDIENTS

Product Name	Active Ingredient(s)
Agree WG	Bacillus thuringiensess spp aizawai
Ancora	Isaria Fumosorsea Apopa Strain 97
AzaDirect	Azadirachtin
AzaGuard	Azadirachtin
Azamax	Azadirachtin
Azatin-O	Azadirachtin
Botanigard Maxx	Pyrethrins, Beauvaria bassiana Strain GHA
Brant organics Aleo	Garlic oil
Captiva	Garlic Oil, Soybean Oil, Capscaisum
Cease (Root Drench Only)	Bacillus Subtillis Strain QST 713
Clonex Rooting Gel	Indole-3-Butyric Acid
Debug Turbo	Fats and Glyceric Olis Margosa, Azadirachtin
Desect	Diatomaceous Earth
Dipel DF	Bacillus Thuringiensis
Gnartrol	Bacillus thuringiensis, subsp. israelensis
Grandevo CG	Chromobacterium subtsugae strain PRAA4-1
ZeroTol	Hydrogen Peroxide
Javelin WG	Bacillus thuringiensess spp kurstaki
Lost Coast Plant Therapy	Soy oil, peppermint essential oil, and citric acid
Mildew Cure	Cotton seed oil, corn oil, garlic oil
Molt-X	Azadirachtin
Monterey b.t.	Bacillus thuringiensis subspecies kurstaki strain SA-12 (Btk)
Neem Oil	Azadirachtin OPP Chemical Code: 121701 (CAS # 11141-17-6)
Neemix 4.5	Azadirachtin
NuFilm P	Pinene polymers, petrolatum, akyl amine ethoxylate
Nuke Em	Citric Acid
Oroboost	Alcohol Ethoxylates
PFR-97	Isaria Fumosorosea Apopka Strain 97
Pyganic EC 1.4 II	Pyrethrins
Pyganic EC 5.0 II	Pyrethrins

Product Name	Active Ingredient(s)
Regalia CG	Reynoutria sachilinensis
Safergrow Mildew Cure	Cottonseed oil 30%, Cornseed Oil 30%, Garlic Oil 17%
Safergrow Pest Out	Cottonseed Oil 0.4%, Garlic Oil 0.2%, Clove Oil 0.1%
Sil-Matrix	Potassium silicate
SuffOil-X	Highly refined Mineral Oil
Suppress EC	Caprylic Acid, Capric Acid (not directly applied to plants)
Triathlon BA	Bacillus amyloliquefaciens strain D747
Trilogy	Neem oil
Valent Dipel Pro DF	Bacillus thuringiensis v kurstaki
Venerate CG	Heat-killed Burkholderia sp. strain A396 cells and spent fermentation media
WideSpread Organic	Polyether-polymethylsiloxane-copolymer, polyether
Xentari	Bacillus thuringiensis, subsp. aizawai, Strain ABTS-1857, fermentation solids, spores and insecticidal toxins
Trifecta Crop Control	Clove oil, thyme oil, garlic oil, peppermint oil, corn oil, citric acid, rosemary oil

2.3 Fertilizers and Soil Amendments

Fertilizers, potting soils, compost, and other soils and soil amendments will be stored in a manner in which they cannot enter or be transported into surface waters and such that nutrients or other pollutants cannot be leached into groundwater. Soils and compost will be stored in one existing contained storage area and two new contained storage areas totaling 3,800 square feet of storage, while fertilizers and soil amendments will be stored in locked steel conex type shipping containers. Fertilizers and soil amendments will be applied and used per packaging instructions and at proper agronomic rates.

3.0 WATER SOURCE, STORAGE, IRRIGATION, AND ESTIMATED USE

Consistent with existing conditions, water for irrigation and fire suppression will primarily be supplied by three existing permitted on-site groundwater wells:

- Well #1 (County Permit Number 17/18-1216) is located east of Friday Ridge Road within the Project Area. Well #1 is completed to a depth of 220 feet and has an estimated yield of 5 gallons per minute according to the Well Completion Report.
- Well #2 (County Permit Number 17/18-1401) is located on the western edge of current APN 524-073-003. Well #2 is completed to a depth of 220 feet and has an estimated yield of 15 gallons per minute according to the Well Completion Report.

- Well #3 (County Permit Number 17/18-1636) is located on the western edge of current APN 524-073-003, south of Well #2. Well #3 is completed to a depth of 200 feet and has an estimated yield of 20 gallons per minute according to the Well Completion Report.

Water is pumped from the wells to temporary holding tanks for regulating water pressure, and then piped from the tanks to the area of cultivation. At all times, water is applied using no more than the agronomic rates using an automated irrigation system. Well water usage will be supplemented with newly proposed rain catchment from 12 new 5,000-gallon tanks (60,000 gallons). These tanks will be filled during the wet season and their usage will be prioritized over well supplies, when possible, to minimize pressures from groundwater extraction.

The currently approved project was analyzed assuming annual irrigation demand of 9.2 acre-feet (3 million gallons), with a monthly maximum of approximately 1.6 acre-feet (509,000 gallons). An updated assessment of the Project's water demand, using more accurate irrigation assumptions and historical irrigation data, found that the Project's annual water demand is estimated to be approximately 7 acre-feet (2.3 million gallons), with a monthly maximum of approximately 1.34 acre-feet (437,000 gallons). See **Table 5, Projected Irrigation Water Usage**, for a breakdown of anticipated monthly water demand by use type.

TABLE 5
PROJECTED IRRIGATION WATER USAGE
(ACRE-FEET)

	Month											
	Jan	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**
Full-Sun Outdoor	-	-	-	0.22	0.44	0.88	0.44	0.26	0.43	0.45	-	-
Light Deprivation	-	-	-	0.07	0.17	0.22	0.13	0.08	0.13	0.12	-	-
Mixed-light	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24
Nursery	0.003	0.003	0.003	0.009	0.009	0.009	0.009	0.009	0.003	0.003	0.003	0.003
Total:	0.24	0.24	0.24	0.53	0.85	1.34	0.82	0.59	0.81	0.81	0.24	0.24

The combined output of the three existing on-site groundwater wells is approximately 0.18 acre-feet (58,000 gallons) per day, indicating sufficient water supply to service the irrigation demands of the Project.

The Applicant acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation under any clearance or permit in the event that environmental conditions, such as a sustained drought or low flows in the watershed will not support diversions for irrigation.

4.0 SUMMARY OF SPECIFIC MEASURES FOR COMPLIANCE WITH SWRCB ORDER

The Project site is enrolled (WDID:1_12CC428884) and maintains compliance with the State Water Resources Control Board ("SWRCB") General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation

Activities (General Order No. WQ 2019-0001-DWQ). Under this order, the facility monitors and reports on storm water runoff conditions and implements best practicable treatment and control measures (e.g. preservation of existing vegetation, fiber rolls, straw mulch, and silt fencing), a Site Management Plan, and winterization procedures (e.g. inspection of roads, management of bed areas, covering trash containers, and stabilization of disturbed areas).

The approved Site Management Plan will be updated, as necessary, to include additional BMPs related to the Project (e.g. thick gravel layer around new structures to minimize erosion and allow for better infiltration of stormwater).

5.0 STORMWATER MANAGEMENT PLAN

5.1 Current Drainage Conditions and Facilities

The Project site's hydrology has been historically altered by the stormwater drainage from Friday Ridge Road (to the west) being diverted onto site's existing hillslope. A portion of the Friday Ridge Road stormwater runoff is conveyed through an in-board roadside ditch diverting water east under the road through a culvert into the Project area on the south side of the main entry and east-west site access road. On the northwest side of the Project area an existing ditch conveys intercepted runoff around the project site so that it does not run onto the Project area. Existing slopes across the site range from 4 to 15 percent with runoff generally flowing from west to east.

A Wetland and Other Waters Delineation Report identified two seasonal drainages outside of the Project boundaries (SHN Engineers, 2017). The first is a natural intermittent drainageway that drains northeast of the Project area. The second drains southeast of the Project area, originating from a drainage ditch paralleling the existing site access road. These drainage features are tributaries to the Trinity River and are seasonally flowing; they do not contain water during the summer months. The Project is setback from the identified drainages and is located outside of any mapped flood hazard areas.

5.2 Site Stormwater Improvements

A licensed engineer was retained to prepare an assessment of existing and proposed drainage conditions, including recommendations for stormwater control measures. Runoff from new impervious surfaces will be managed through the use of a rainfall catchment system. The required storage volumes have been sized to hold the estimated runoff volumes for each group of structures plus an additional 20% safety factor. Based on the hydrology assessment, a total of twelve 5,000-gallon tanks have been incorporated into the project design to retain site runoff.

5.3 Site, Erosion Control, and Drainage Feature Maintenance

- Roads will be maintained as appropriate (with adequate surfacing and drainage features) to avoid developing surface ruts, gullies, or surface erosion that results in sediment delivery to surface waters.

- Roads, driveways, trails, and other defined corridors for foot or vehicle traffic of any kind will have adequate ditch relief drains or rolling dips and/or other measures to prevent or minimize erosion along the flow paths and at their respective outlets.
- Roads and other features will be maintained so that surface runoff drains away from potentially unstable slopes or earthen fills. Where road runoff cannot be drained away from an unstable feature, an engineered structure or system will be installed to ensure that surface flows will not cause slope failure.
- Roads, clearings and work areas (cleared/developed areas with the potential for sediment erosion and transport) will be maintained so that they are hydrologically disconnected, as feasible, from surface waters, including wetlands, ephemeral, intermittent and perennial streams.
- Ditch relief drains, rolling dip outlets, and road pad or terrace surfaces will be maintained to promote infiltration/dispersal of outflows and have no apparent erosion or evidence of soil transport to receiving waters.
- Stockpiled construction materials, if necessary, will be stored in a location and manner so as to prevent their transport to receiving waters.
- Grading and ground disturbances for the construction of the new commercial nursery, processing, and distribution buildings will implement a variety of erosion and sediment control measures throughout the buildout of each structure. These control measures include straw mulch, fiber rolls, and silt fencing to prevent soil export off site.

6.0 INVASIVE SPECIES CONTROL PLAN

A professional biological consulting firm was retained to prepare an Invasive Species Control Plan for the Project. A field survey was conducted and observations of any invasive species present were recorded. A total of 18 invasive species were identified primarily within the walkways of raised beds. Management and removal recommendations were provided for each of the 18 invasives species identified, and included a variety of biological (e.g. reintroduction of native species) and mechanical (e.g. mowing, tillage, grazing, and hand pulling) control methods. The Project will incorporate the recommendations of the invasive species control plan.

7.0 MATERIALS MANAGEMENT PLAN

7.1 Non-Cannabis Solid Waste Disposal

Non-cannabis solid wastes including, but not limited to, clone trays, empty soil bags, soil amendment bags, fertilizer bags and containers, empty plant pots or containers, agricultural plastic sheeting, and spent growth medium/soil will, for as long as they remain on the site, be stored at locations where they will not enter or be blown into surface waters, and in a manner that ensures that residues and pollutants within those materials do not migrate or leach into

surface water or groundwaters. The site will be equipped with covered 5-yard dumpsters for the disposal of solid waste materials. Cannabis plant waste disposal is discussed below in Section 7.2.

Agricultural plastic sheeting for light deprivation structures will be used for the length of the manufacturer's lifetime rating or to the extent practicable due to environmental conditions on site. Due to dirt and other contaminants, agricultural plastics are not typically recyclable. Agricultural plastics used at this site will be disposed of via a licensed local solid waste handler.

Refuse and garbage will be stored in a location and manner that prevents its discharge to receiving waters and prevents any leachate or contact water from entering or percolating to receiving waters. Refuse will be sorted to divert recyclables such as paper, plastic, glass, and metals from the waste stream. Those recyclables will be taken to a recycling center for recycling.

The remaining solid wastes will be collected and deposited into a solid waste receptacle for temporary storage, which will be kept covered. The solid waste will be removed from the site no less frequently than weekly and disposed of at an authorized waste transfer facility. The solid waste receptacle will be sized appropriately for the volume of waste generated and may be adjusted in size periodically as conditions warrant due to production cycles and seasonal factors.

7.2 Cannabis Waste Disposal

Consistent with §17223 of the Department of Cannabis Control's regulations, cannabis and cannabis product waste will be managed through either or a combination of the following:

- On-site composting in designated compost area located within the fenced project boundary;
- Collection and processing of cannabis waste by a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency in conjunction with a regular organic waste collection route; or
- Self-hauling under the facilities distribution license.

Non-compost cannabis and cannabis product waste will be stored in a secured waste receptacle or secured area located within the manufacturing/distribution building.

A batch of cannabis or cannabis products that is being disposed of because the batch has failed internal quality testing, quality assurance review by a distributor, or regulatory compliance testing will be rendered unusable under video surveillance prior to disposal.

The methodology for disposing of cannabis waste shall be in compliance with all state regulatory requirements.

7.2.1 Records of Destroyed Cannabis Product

Records of destroyed raw materials and product will be kept and cross-referenced by batch number and State METRC RFID number. These items will be destroyed within the state's METRC

system, which tracks the product's RFID, the quantity, weight, or volume, as appropriate, and the method of disposal. In addition, the reason for disposal and the disposition of the batch shall be noted in the METRC system. Subject to possible State and local ordinance changes, the methodology for recording destroyed cannabis waste shall be in compliance with all State and local regulatory requirements.

7.3 Hazardous Materials Management Plan

7.3.1 Statement

The facility may handle routine agricultural products, support chemicals (e.g., fertilizers, pesticides, fuels, lubricants), and fuels (e.g. propane) in amounts requiring a Hazardous Material Business Plan (HMBP). If so, it will register its hazardous materials with the local agency using the Hazardous Materials/Waste Registration Form so that the local agency can evaluate the storage or use and give notice of any permits or storage/use fees that may apply.

If the facility begins to handle any individual hazardous material or mixture containing a hazardous material which has a quantity at any time during the reporting year equal to or greater than those listed below, it will complete a Hazardous Material Business Plan (HMBP) and submit a copy to the local agency (Humboldt County DHHS Division of Environmental Health):

- Equal to or greater than 500 pounds or total volume of 55 gallons of hazardous materials. [H&SC §25503.5(a)(A)]
- Equal to, or greater than, 200 cubic feet at standard temperature and pressure, if the substance is compressed gas [H&SC §25503.5(a)(B)].
- The following amounts for liquid hazardous materials:
    - Lubricating oil as defined by H&SC §25503.5(b)(2)(B): 55 gallons of any type or 275 gallons aggregate quantity on site. H&SC §25503.5(b)(2)(A)]
    - All others, including waste oil: 55 gallons. [H&SC §25503.5(a)]
- The following amounts of hazardous material gases:
    - Oxygen, Nitrogen, or Nitrous Oxide stored/handled at a physician, dentist, podiatrist, veterinarian, or pharmacist's place of business: 1,000 cubic feet of each material on site. [H&SC §25503.5(b)(1)]
- All others: 200 cubic feet. [H&SC §25503.5(a)]
    - Amounts of radioactive materials requiring an emergency plan under Parts 30, 40, or 70 of Title 10 Code of Federal Regulations or equal to or greater than applicable amounts specified in items 1, 2, or 3, above, whichever amount is smaller. [H&SC §25503.5(a)]
    - Applicable federal threshold planning quantities for extremely hazardous substances listed in 40 CFR Part 355, Appendix A.

7.3.2 Hazardous Material Storage

The project will only utilize conventional agricultural products such as fuels, propane, fertilizers, pesticides, and other potentially hazardous materials. These materials will be stored consistent with the requirements of the Humboldt County Environmental Health Department. Fertilizer, fuels, and pesticides will be stored in locked Conex type shipping containers located south of the existing central access road. In a single month, it is anticipated that the project may store up to 200 pounds of nitrogen and up to 55 pounds of phosphorous. The Operator does not anticipate the storage of pesticides or fertilizers in threshold quantities for a HMBP; however, the propane tanks will likely trigger the threshold quantities for a HMBP. Liquid propane deliveries will be handled by a licensed propane distributor. Adequate fire safety equipment (e.g. extinguishers) and safety relief valves will be provided or installed.

7.3.3 Hazardous Material Disposal

It is recognized that hazardous materials and wastes from agricultural businesses are regulated by the Humboldt County Environmental Health Division, that administers the Hazardous Materials program as one of the Certified Unified Program Agencies (CUPA). Disposal of any chemical or hazardous waste will be conducted in a manner consistent with federal, state and local laws, regulations, rules or other requirements. Chemical/hazardous wastes will be handled and disposed of properly by Safety-Kleen or another qualified and properly licensed contractor.

8.0 SEWAGE DISPOSAL PLAN

Bathrooms will be provided for facility workers within the new distribution and processing buildings. These facilities will be equipped with a septic system sized by a professional engineer for the number of employees operating within these structures. A licensed engineer was retained to perform a soils suitability study and prepare a draft onsite wastewater treatment system design.

The Operator will continue to contract with a professional temporary sanitation facilities services provider to provide and maintain toilet and hand washing facilities for the remaining cultivation employees.

9.0 SOILS MANAGEMENT PLAN

Soils used for cultivation will be refortified after harvest by means of regenerative farming practices so that it may be used again for future cultivation, and the cycle repeated as many times as feasible to minimize the amount of imported soil necessary. In the event that soil cannot be reused, it will be disposed of appropriately as solid waste in compliance with state and local law.

10.0 PROCESSING PLAN

10.1 Processing Practices

Immediately following harvest, onsite cannabis will either be frozen in a new ±320 square foot storage container for onsite/offsite manufacturing or processed within the new ±5,400 square processing building. Processing at the facility will include drying, trimming, and the production of pre-rolls. In addition to the general facility safety practices discussed above, processing at the facility will, at a minimum, implement the following processing specific practices and protocols to prevent contamination and mold/mildew growth on cannabis product:

- Processing operations will be maintained in a clean and sanitary condition, including work surfaces and equipment;
- Processing and trimming areas will be cleaned regularly between harvest batches;
- Harvest batch separation, tracking, and inventory control;
- Drying/storage will be separated into 3 bays and will keep batches separate to help isolate potential contamination or mold;
- The building will be equipped with HVAC for climate control and dehumidification;
- Employees handling cannabis in processing operations will have access to facemask and gloves in good operable condition as applicable to their job function;
- Employees must wash their hands sufficiently when handling cannabis or use gloves;
- Processing at the facility will require up to 10 full-time and 10 seasonal employees;
- Transfer of all materials from cultivation areas to the frozen storage container and processing building will be done using an onsite access road;
- All processing activities will implement consumer safety control processes, procedures, and documentation; and
- All cannabis materials within the processing operation will be tracked via the methods described in the materials management section above.

10.2 Product Quality Control

In addition to meeting all state and local requirements for product quality control, the standard procedures for processing operations will include the following:

Samples from each batch of bulk products will be screened and R&D tested by a state licensed independent laboratory for potency, pesticides, mold, and other undesirable qualities prior to release for bulk sale to wholesalers or sending to consumer packaging for retail sale. Once cannabis products are packaged for retail sale, they will follow the state requirements for finished good testing prior to distribution to a retailer. The Operator may send these products to another

distribution location for final consumer testing. Documentation of all final consumer lab test results will be kept on file.

10.3 Packaging

All final packaging of processed goods will meet state requirements for packaging.

11.0 PARKING PLAN

The facility will provide 44 standard (8' x 20') onsite gravel parking spaces. In addition, 2 ADA compliant parking spots will be provided to service the new processing and distribution/manufacturing buildings.

12.0 ENERGY PLAN

Power for the new greenhouse, processing, distribution/manufacturing, and nursery buildings will be provided by an existing PG&E connection. The Project will obtain renewable energy through the Redwood Coast Energy Authority or a suitable equivalent source. Lighting used within the new structures and for security purpose will utilize energy efficient light bulbs and motion sensors to help minimize energy demand. Further, lighting used for mixed-light cultivation within the greenhouses will utilize energy efficient light bulbs, such as LED, and operated to the minimum extent practicable. Heaters for the new greenhouses will operated using propane and will be supplied via two 1,000-gallon liquid propane tanks. In case of emergency, the Operator will use up to 3 emergency backup generators for key facility operations with risk of lost product in the event of a power failure.

13.0 SECURITY PLAN

Security measures at the site will secure cannabis and cannabis products against diversion for non-commercial purposes by protecting against theft not only from intruders, but also from staff members and visitors. This will be done by limiting access into the facility as necessary and by surveillance monitoring of personnel and visitors at all times when in close proximity to the product. Strict inventory control measures will also be engaged to prevent and detect diversion.

All cannabis other than lab samples will be transported to a state licensed commercial cannabis facility by a state licensed distribution company.

The general security measures located on the premises will include the following:

13.1 Video Surveillance and Lighting

The existing outdoor video surveillance system can effectively monitor the space in and around the general facility. New buildings, greenhouses, and hoophouses will be equipped with additional indoor and outdoor video surveillance. In additions, these structures will be equipped

shielded motion sense exterior lighting that is directed so as to not pose a nuisance to neighboring properties.

13.2 Alarm

A security/burglar alarm system is installed and operated at appropriate times within the facility. New facility structures will be equipped with the necessary alarm and video surveillance systems.

13.3 Access Control

Entrances to the facility will be restricted by an access control system. Twenty-four (24) hour access to the facility by emergency responders (Fire Dept.) will be provided via a Knox Box if requested. Structure onsite will be locked with restricted access to ensure employee access limited to only designated job areas.

13.4 Fencing

The cultivation area is fenced with chain-link fencing.

14.0 NOISE SOURCE ASSESSMENT AND MITIGATION PLAN

A noise assessment was prepared by a licensed engineer analyzing existing conditions at the facility in comparison to proposed project activities. The noise study determines that the proposed structures and existing topography, vegetation, and contours are anticipated to attenuate project sound to below the 3 dB increase required in the CCLUO and that the proposed sound levels do not exceed the maximum allowable within the HCGP for an AG zoned parcel. Accordingly, no mitigation measures were identified or required.

15.0 LIGHT POLLUTION CONTROL PLAN

New outdoor security lighting for the Project will be shielded to prevent light from going outside of the Project boundary. In addition, lighting for mixed-light cultivation will not be turned on until greenhouse blackout curtains have been drawn to prevent light from escaping between sunset and sunrise.