

Cultivation and Operations Plan Crossland Management



Humboldt County Commercial Medical Cannabis Land Use Ordinance

**APN 317-023-010
1910 Gorden Road, Kneeland**

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Submitted to:



Prepared by:



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Preface

This Cannabis Cultivation and Operations Plan (CCOP) is hereby submitted to comply with the California Emergency Regulations for Cannabis Cultivation (CERCC). Compliance is required by CalCannabis Cultivation Licensing which is a division of the California Department of Food and Agriculture (CDFA). The CCOP is required to be in compliance with CERCC *Article 2 §8104 General Environmental Protection Measures*, *Article 2 §8105 Property Diagram*, *Article 2 §8106(a)(1) Cultivation Plan Requirements*, and *Article 4 Cultivation Site Requirements §8300 to §8308*, as applicable. The following items within the CCOP are regulated by CDFA:

- A. Canopy area(s), including noncontiguous aggregate square footage.
- B. Area(s) outside of the canopy where only immature plants shall be maintained.
- C. Pesticide and other agricultural chemical storage area(s).
- D. On-site processing area(s).
- E. Designated on-site packaging area(s).
- F. Secured area(s) for cannabis waste.
- G. Composting area(s), if composting cannabis waste on site.
- H. Storage area(s) for harvested cannabis.
- I. Compliance with *California Water Code §13149* policies for cannabis cultivation.
- J. Compliance with any conditions requested by the California Department of Fish and Wildlife (DFW) and the State Water Resources Control Board (SWCB).
- K. Dark Sky policies to avoid nighttime glare.
- L. Discovery of human remains policies as required by *California Health and Safety Code §7050.5*.
- M. Renewable energy requirements.
- N. Generators use requirements.

Further, Humboldt County requires a CCOP for a cannabis business permit under Humboldt County Code (HCC) Chapter 3 Division 1 Title III §313 55.4, known as the Commercial Medical Marijuana Land Use Ordinance (CMMLUO). The CMMLUO regulates compliance at the local governmental level to ensure that conditions required under state and local law, or those requested by any agency with jurisdiction, are implemented as proposed within the CCOP. Therefore, the purpose of this CCOP is to identify and outline the methods to be used to meet the minimum requirements for CDFA licensing, Humboldt County Planning and Building Department permitting, and any other local or state requirements.

I. Project Site

Crossland Management (Crossland) is located at 1910 Gorden Road, APN 317-023-010. It is a remote one hundred ninety-three-acre (193ac) quarter section homestead situated at the top of McAlvey & Black Butte Ridgeline at a general elevation three thousand eight hundred feet above sea level (3,800'AMSL). The parcel consists of areas of bald hill top used for agriculture, significant commercial timber, and a nine-acre (9ac) pond

A. Location

As the crow flies the site is sixteen miles (16mi) southeast of Kneeland, seven miles (7mi) east of Lone Star Junction, and twelve miles (12mi) northwest of Dinsmore (Figure 1). The parcel is access from Kneeland using the following route:

1. South sixteen and one-half miles (16.5mi) on Kneeland Road.
2. Turn left at Lone Star Junction on Showers Pass Road.
3. Head east on Showers Pass Road for eight and six-tenths miles (8.6mi).
4. Continuing straight on the Gorden Road ridgeline one and three-tenth miles.
5. Driveway is on the left.

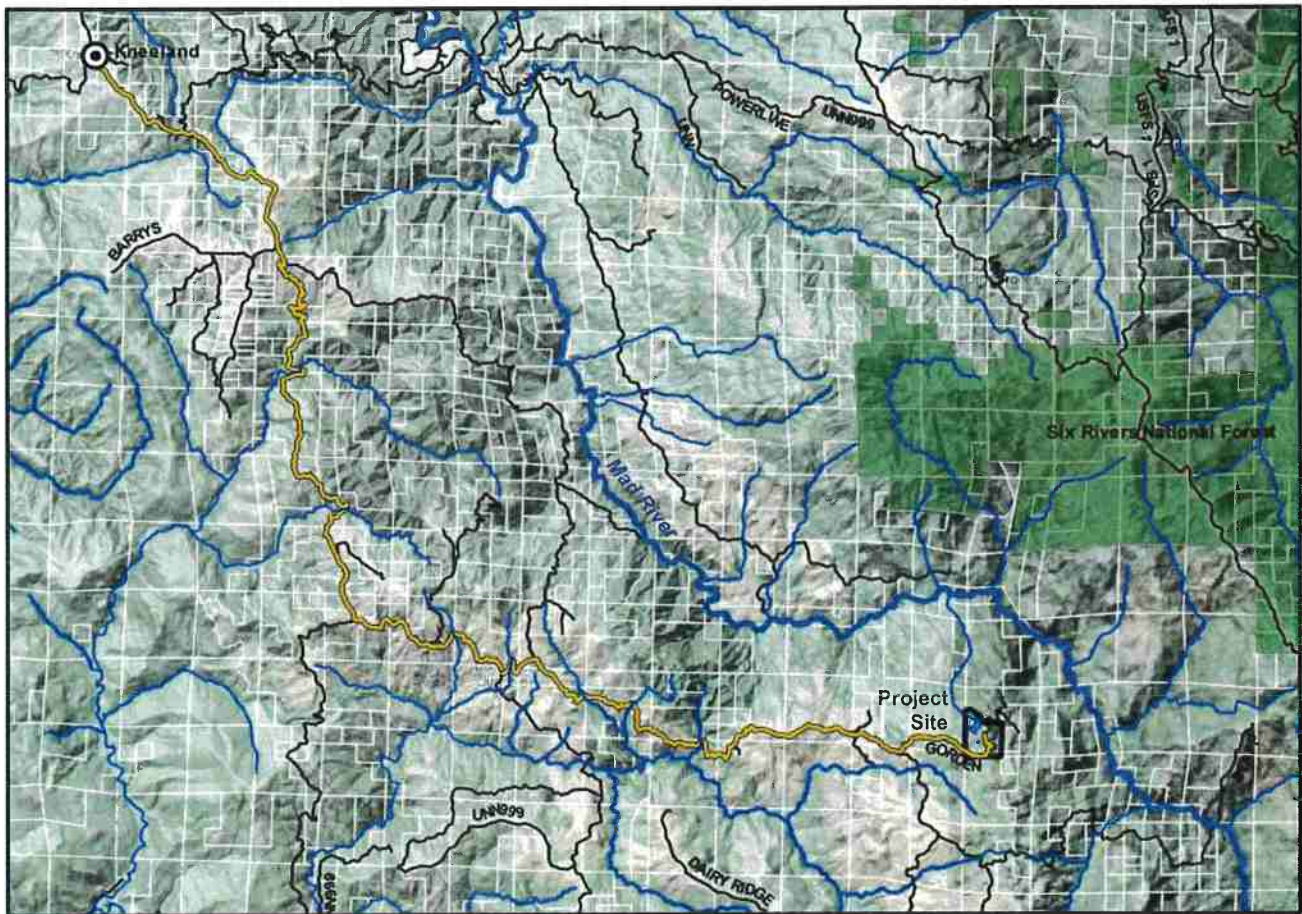


Figure 1: Project Location

B. Zoning

The intent of Humboldt County Zoning Code is to implement the policies and elements of the Humboldt County General Plan. The Code is based upon Principle Zones and has further Combining Zones. All uses and development regulations of the Principal Zone apply in the Combining Zone, except, they are modified by the uses and regulations allowed within the Combining Zone regulations.

Crossland Management is Principally Zoned as Agriculture Exclusive (AE) and Timberland Production (TPZ). The AE zone are open grassland and ponds which were used for agricultural livestock purposes in the past. Within the TPZ Zone is significant commercial timber. These zones determine overall development and allow the following:

1. Agriculture Exclusive
 - a. Principally Permitted: all agricultural uses, farm dwellings, windmills, greenhouses, silos, tank houses, barns and outbuildings, coops, drainage facilities and structures, roadside agricultural sales, public stables, and other necessary or customary uses.
 - b. Uses with a Permit: animal or fur farms, feed lots, auction yards, animal or timber processing plants, irrigation equipment sales and storage, veterinarian hospitals, labor camps, or anything compatible but not enumerated within Zoning Code.
2. Timberland Production
 - a. Principally Permitted: growing and harvesting timber, farm dwellings, windmills, greenhouses, silos, tank houses, barns and outbuildings, coops, drainage facilities and structures, roadside agricultural sales, public stables, and other necessary or customary uses.
 - b. Uses with a Permit: watershed management, fish and wildlife management, roads, log landings, log storage areas, portable chipper and sawmill, utility transmission infrastructure, grazing and agricultural uses, single family dwelling, temporary labor camp, and public recreational use for profit.

C. Principally Permitted Uses

Principally permitted uses in both zones are similar with the only difference of use is agricultural versus timber production. All agricultural uses found under Principally Permitted shall require a simple Agricultural Exempt (Ag-Exempt) Permit. It shall be necessary to apply for permitting using the Plot Plan and simple forms from the Humboldt County Building Department for the following items:

1. Alternative Owner Building (AOB) Permit for the residences.
2. Ag-Exempt Permits for the:
 - a. Greenhouses without air conditioning and/or heating.
 - b. Water Tanks up to five thousand gallons (5,000gal).
 - c. Agricultural use buildings without insulation, heating, and/or cooling.
 - d. Storage sheds.

D. Site Hydrology

The parcel is situated at the top of McAlvey and Black Butte Ridgeline at a general elevation of three thousand eight hundred feet above sea level (3,800' AMSL) with a northern and eastern aspect. It drains two (2) Class II/III waterways, Morgan Creek and an unnamed stream, into the Mad River midway between the Pacific Ocean and Ruth Lake (Figure 2). The cultivation site is clustered on a flat with less than fifteen percent (<15%) slope at the three thousand seven hundred feet (3,700') contour adjacent to the nine-acre (9ac) pond which is the headwaters of Morgan Creek.

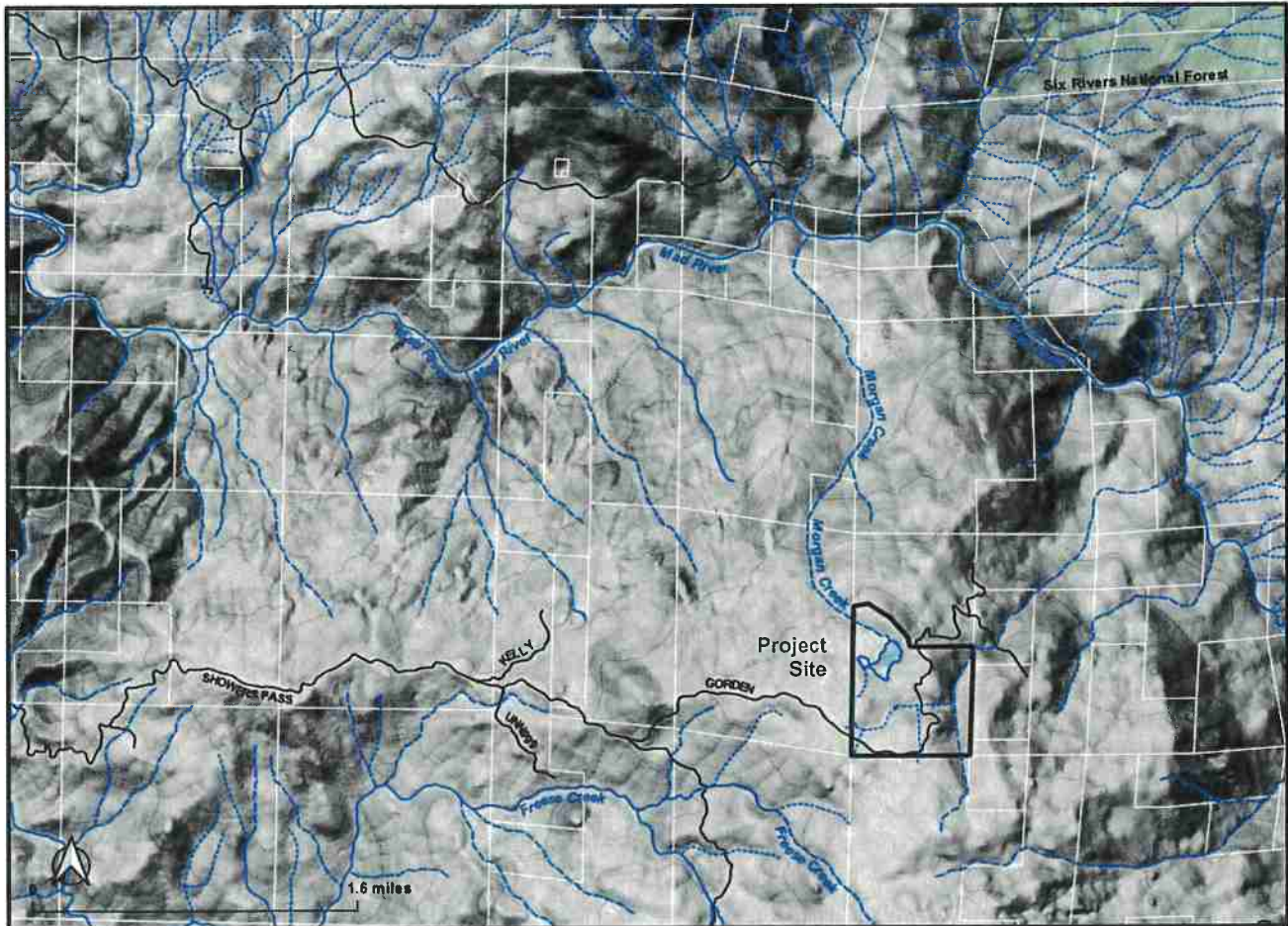


Figure 2: Site Hydrology

E. Climate

Rain gauge records accessible via the Western Regional Climate Center's (WRCC) for Mad River Ranger Station states the area experiences average annual rainfall of sixty inches (60") and forty-five inches (45"). This gauge location provides a reasonable understanding of local climate as it is approximately at the same elevation and seventeen miles (17mi) by air to the east within the same watershed of the project . During the summer months of late June through mid-September temperatures can regularly reach over one hundred degrees Fahrenheit (100 F) which is to be expected daily late July through August (Figure 3). Precipitation in the area can also vary greatly

from the average of sixty inches (60") of rain. Rainfall in the area can be as high as of eighty-one inches (81") and during drought conditions as low as twenty-seven inches (27"). Typically, precipitation is greatest during the months of November through February, which is when all diversions shall occur.

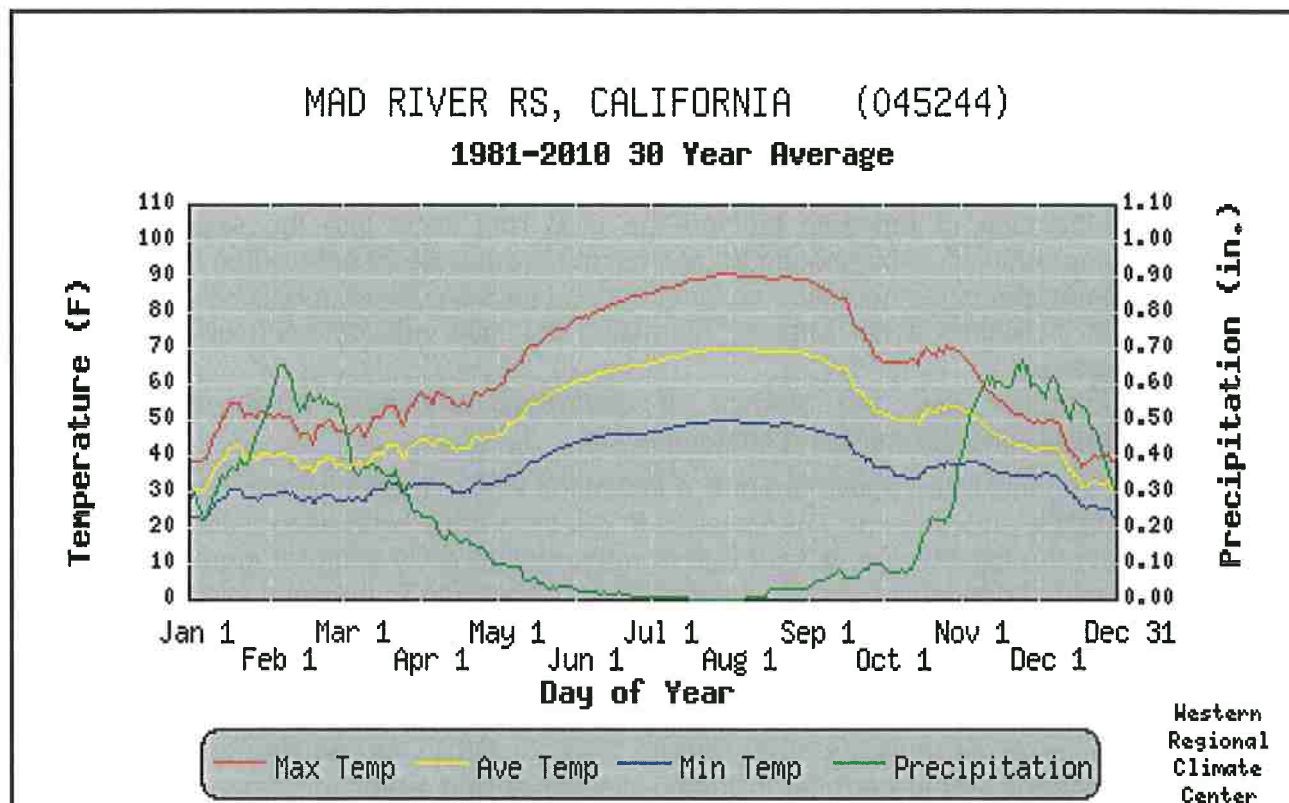


Figure 3: WRCC Mad River Ranger Station Climate Data

Source: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca5244>

F. Fisheries

There are many Species of Concern within the project site, some of which have state and federal protection, including Threatened and Endangered Species status. Operations can have an impact to these species at any time due to noncompliance with environmental regulations. These species can be vegetation, aquatic lifeforms, and terrestrial wildlife including the Northern Spotted Owl (*Strix occidentalis caurina*).

Species of most concern regarding operations and direct impacts are salmon found within local rivers and streams (Figure 4). These species require clean, cool, and flowing river conditions to survive. Local fisheries which are dependent upon water quality for spawning and rearing include:

1. Fall-run California Coast Chinook salmon (*Oncorhynchus tshawytscha*)
2. Southern Oregon Northern California coho salmon (*O. kisutch*)
3. Winter-run and summer-run North California Coast steelhead (*O. mykiss*)
4. Resident rainbow trout (*O. mykiss*)
5. Anadromous coastal cutthroat trout (*O. clarkii*)

6. Pacific Lamprey (*Entosphenus tridentatus*)
7. Green sturgeon (*Acipenser medirostris*)

Operations can potentially have a direct impact upon the water quality of the Class II stream. This in turn affects the salmonid fishery of the Eel River. Impacts to the Eel River fishery can be created through a number of ways including:

1. Diversion during forbearance period which directly reduces in-stream flows and increase temperatures for juvenile rearing habitat.
2. Diversion rates higher than allowed which reduce instream flows needs for seasonal migration and spawning.
3. Infiltration of nutrients beyond the crop root zone into the stream which contribute to in-stream algae blooms and reduce dissolved oxygen levels.
4. Improper implementation of sediment and erosion control measures can result in increased water turbidity damaging fish gills and covering up spawning gravels.
5. Improper use and storage of hazardous materials which can cause environmental spills and contamination.

The impacts listed above are only a few of the way's operations can have a direct impact upon the environment. The fisheries in the area have evolved to a life cycle that is timed with the local water cycle of rain from late fall to early spring (Figure 4). Water use for seasonal cannabis operations are in direct opposition to the salmonid fishery life cycle which is protected by state and federal law.

Therefore, it shall be a primary concern that project operations minimize and mitigate impacts to the local environment. How this shall be accomplished is through the implementation of all requests made by the SWB or DFW. All requirements shall be adhered as found within permits, including discharge and water forbearance periods, development of environmentally responsive business policies and procedures, and regular monitoring with recording of on-site conditions.

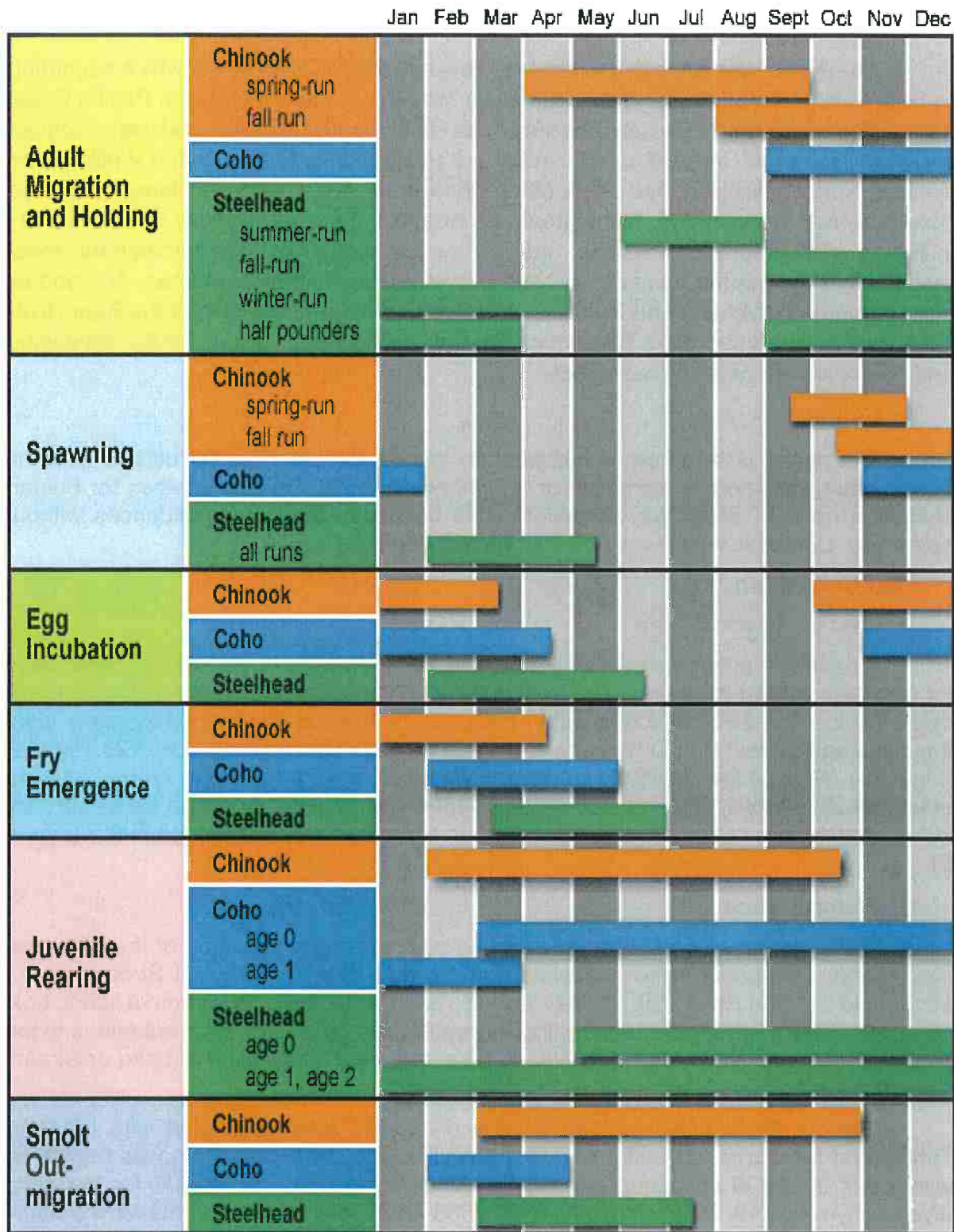


Figure 4: Northern California Salmon Life Cycle Calendar

Source: <http://www.trrp.net/wordterrain/wp-content/uploads/2017/07/fishresources1.gif>

G. Historic Resources

The project site is located in the Mad River and Black Butte area, which according to Native Land Digital (<https://native-land.ca/>), was the in the territory of a Pacific Coast Athapaskan Eel River Wailakian tribe known as the Nongatl and may have been a contact area with Redwood Creek/Mad River Athapaskan Hupa tribe known as the Whilkut. The Whilkut, Nongatl, Whilkut, and many other tribes were essentially annihilated during the Bald Hills War in the 1860s. Many areas are historic with unknown sites of past activity including displacement, homicide, hunting or gathering, or other important tribal resources; including the parcel which has known archaeological resources. Any and all tribal resources which may be found would come under the jurisdiction of the Bear River Tribe and/or the Hupa Valley Tribe, both Federally Recognized Tribes, for the cataloging and preservation of historic resources.

H. Utilities

The parcel is a remote homestead so lacks basic services for utilities such as public water, commercial electrical, or telephone services. On-site services for human sanitation need of septic for wastewater has been developed for residences without permitting. Domestic water was provided by a spring box.

II. Past Cultivation

A. Past Cultivation Area

A review of publicly available satellite imagery shows that the site has been used for cannabis cultivation since 2012. Past cultivation can clearly be seen in Google Earth dated August 23, 2012 of a site within the pond high water mark approximately eight thousand square feet (8,000²) in size at latitude 40.623218° and longitude -123.744994° (Figure 5). Within a few years the cultivation area was moved north to its current location at latitude 40.624091° and longitude -123.744904°, as shown on Google Earth May 28, 2014, and expanded to thirty-eight thousand five hundred square feet (38,500²) (Figure 6).

B. Water Source

Cultivation has been undertaken in the past utilizing a diversion of the nine-acre (9ac) pond. This pond is the headwaters of Morgan Creek, a Class II Stream, and a tributary to the Mad River. The residences were provided potable water from a spring box. These diversions were undertaken without a water right or appropriation submitted to the SWCB Division of Water Rights (DWR) nor was a §1600 Notification of Lake or Stream Alteration Agreement (§1600 LSAA) to DFW.

Early in the compliance process the diversions were registered with DWR by Timberland Resource Consultants (TRC). Pond diversion for cultivation was registered with DWR S025999 on January 03, 2017. DFW issued an LSAA 1600 for the pond diversion on June 19, 2017 with 1600-2016-0586-R1. Domestic water rights were claimed with DWR S026005 on January 03, 2017.

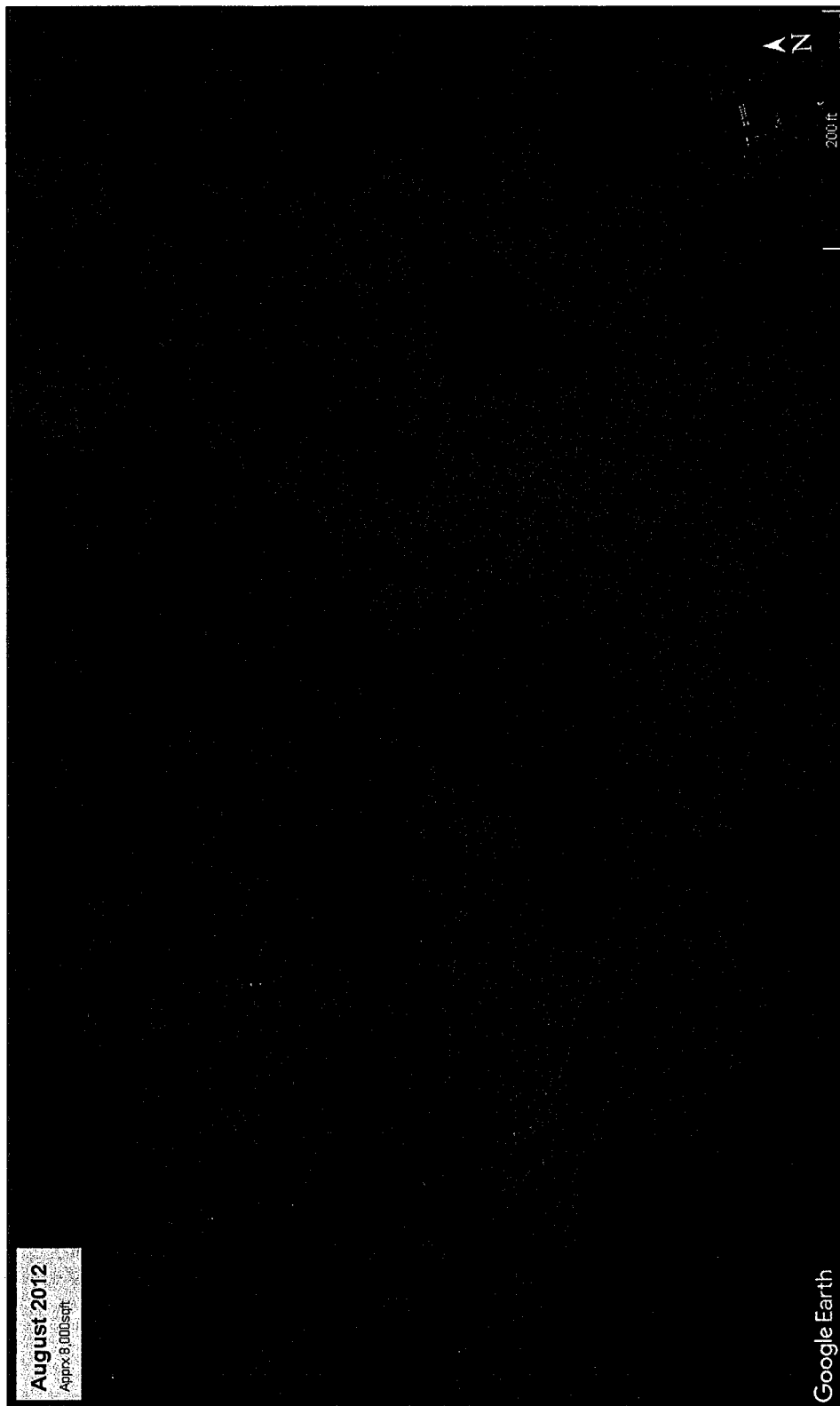


Figure 5: Past Cultivation August 23, 2012



Figure 6: Evidence of Past Cultivation June 9, 2015

III. Operations Plan

The following Cultivation and Operations Plan is to identify and outline the methods to be used to meet the minimum requirements for CDFA licensing, Humboldt County Planning and Building Department permitting, and any other local or state requirements related to cannabis production. These methods shall be requirements of maintaining compliance with local and state regulatory agencies. Strict adherence to development and implementation of the project site as stated shall be of the utmost importance. This Operations Plan is intended for a project totaling thirty-three thousand two hundred thirty-seven square feet (33,237'²) outdoor and six thousand square feet (6,000') mixed- light cultivation.

A. Implementation Schedule

Implementation of this project shall be ongoing to maintain compliance with ever changing regulations from numerous agencies, including but not limited to, the County of Humboldt and the State of California. Fully meeting compliance with State laws is dependent upon a Humboldt County Cannabis Permit before any construction can occur under a Building Permit. The SWB Discharge Permit 1_12CC418905 issued on June 27, 2019, which superseded WDID 1B170376CHUM assigned by the North Coast Regional Water Quality Control Board, has a five (5) year deadline to meet compliance.

The intent is to complete compliance requirements within two-(2) years once a Humboldt County Cannabis Permit has been issued (Table 1). Implementation shall occur during allowed construction and operational season under a six-month (6mo) Building Permit. There are different schedules allowed for construction related activities, which the State begins on April 1 with winterization November 15, whereas the County season starts April 15 with winterization by October 15.

All construction related activities shall be implemented under a Building Permit. Construction to meet compliance shall occur between April 15 and October 15. Compliance shall be undertaken immediately upon receipt of the Cannabis Permit and are scheduled to be completed within two (2) years.

Table 1: Compliance Schedule					
Permit/License	Agency	Number(s)	Start	Compliance Schedule	Deadline
Discharge Permit	CA NCRWQB	1B170376CHUM	-----	Apr 1 to Nov 15	Superseded 6/27/2019
Discharge Permit	CA SWB	1 12CC418905	06/27/2019	Apr 1 to Nov 15	6/27/2024
1600 LSAA	CA DFW	1600-2016-0586-R1	06/19/2017	Apr 1 to Nov 15	6/19/2022
Well	Humboldt DEH	18/19-0295	Completed 11/06/2018	Monthly Recorded Metering	SWB Reporting
Well	DWR	WCR2018-010085	Submitted 11/07/2018	Monthly Recorded Metering	SWB Reporting
Small Irrigation Use Registration	CA DWR	DWR S025999	01/03/2017	Annual	SWB Reporting
Interim Cannabis Permit	Humboldt Planning	11819	2/06/2018	Annual	Active
Provisional License	CDFA CalCannabis	CCL18-0000239 CCL18-0000240	05/31/2019	Annual	Active 05/31/2020
Cannabis Permit & CEQA	Humboldt Planning	TBD	TBD	2 Years	TBD
Building, Electrical, Septic, Grading, Ag Exempt, & AOB	Humboldt Building	TDB	Dependent upon Cannabis Permit	Construction April 15 to Oct 15	Awaiting Cannabis Permit Within 2yr
Septic Permit	Humboldt Department of Environmental Health	TDB	Dependent upon Cannabis Permit	Completed	Awaiting Cannabis Permit

B. Discovery of Human Remains or Archeological Resources

California Health and Safety Code §7050.5 requires operations to cease in the advent of the discovery of human remains. Further, Humboldt County requires cessation of activities should archeological resources be inadvertently found. There are potential to find such remains or resources due to the history of the area. Disturbance without notification, with intent to possess or to maliciously destroy such items, carries the weight of the law, including and not limited to, felony charges.

The property was surveyed May 2018 by William Rich, M.A., RPA of William Rich and Associates. There were multiple archaeological resources associated with hunting and gathering found upon the property within the agricultural areas and driveway. Given within the report development are development guidelines, which if followed, will not cause a substantial adverse change in the significance of the identified archaeological sites.

The following actions shall immediately occur upon the discovery of human remains or archeological resources:

1. Human Remains

- a. Operations shall immediately cease in the advent of the discovery of human remains.
- b. The Humboldt County Sherriff Department shall be notified at (707) 445-7251.
- c. The Humboldt County Coroner shall be notified at (707) 445-7242.
- d. The Bear River Tribal Heritage Preservation Office shall be notified at (707) 733-1900.
- e. The Hoopa Valley Tribal Heritage Preservation Office shall be notified at (530)625-4284, ext.112.
- f. The Humboldt County Planning Department shall be notified at (707) 445-7541.

2. Archeological Resources

- a. Operations shall immediately cease in the advent of the discovery of archeological resources, including but not limited to:
 - i. Obsidian or chert tools such as arrowheads, axes, knives, or spears.
 - ii. Obsidian or chert flakes.
 - iii. Stone tools.
 - iv. Groundstone artifacts.
 - v. Locally darkened midden soils.
- b. The Bear River Tribal Heritage Preservation Office shall be notified at (707) 733-1900.
- c. The Humboldt County Planning Department shall be notified at (707) 445-7541.

The following has Archeological Report shall be implemented:

- 1. ***William Rich, M.A., RPA of William Rich and Associates in May 2018 report states development of property "will not cause a substantial adverse change in the significance of the identified archaeological sites" with the following recommendations:***
 - a. ***Avoid ground disturbing activity by capping with geotextile cloth.***
 - b. ***Use above ground planters.***
 - c. ***Design temporary in design or removal greenhouses without foundations.***
 - d. ***Front driveway capped with base rock with no further road grading.***

C. Agricultural Employer

Crossland Management shall be an is an "agricultural employer", as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with §1140) of Division 2 of the Labor Code, to the extent not prohibited by law. On site-housing shall not be provided to agricultural employees.

The farm shall be owner operated employing persons for hire as allowable by law.

1. There shall be one (1) manager of the daily operations of the farm.
2. There shall be two (2) full-time employees.
3. Up to five (5) temporary part-time employees may be hired as seasonally required for planting, harvesting, or processing.
4. If ever over 20 employees are hired, they shall be allowed to unionize and negotiate a Labor Peace Agreement according to MCRSA §19322(a)(6).

Farm operations shall 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, Americans with Disabilities Act (ADA), and the Humboldt County Code (including the Building Code). At all times, employees shall have access to safe drinking water, toilets, and handwashing facilities that comply with all applicable federal, state, and local laws and regulations.

Operations shall implement safety protocols to protect health and safety, property, and the environment through adequate planning and training relevant to specific operations including, and not limited to, the following:

1. ***Track & Trace with training*** in accordance with the policies of County of Humboldt and State of California.
2. ***Private Applicator Certification*** shall be undertaken with the Humboldt County Agricultural Commissioner.
3. ***Potable water shall be provided by the on-site well.***
4. ***Human wastewater shall be managed by on-site permitted septic systems.***
5. Equipment required for the safe handling of cannabis shall readily be available on-site at all times.
 - a. All personal equipment shall meet all local and state requirements while being OSHA compliant.
 - b. OSHA certified safety glasses (tinted and clear), hats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection shall be on-site and used as required.
 - c. Training in the use of personal protective equipment shall be undertaken on an annual basis.
6. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations. Additionally, this plan shall incorporate:
 - a. ***Policies concerning CPR & 1st Aid*** shall be developed and implemented.
 - i. 1st Aid Station(s) shall be provided on-site.
 - b. ***Fire prevention meeting CalFire Fire Safe standards*** shall be incorporated and implemented.
 - i. A minimum of five thousand-gallons (5,000gal) of water shall be dedicated for CalFire Fire Safe purposes and not connected to the Cultivation Area.

- ii. A minimum of two (2) dry chemical fire extinguishers shall be maintained and certified on an annual basis with a twenty-pound (20lb) capacity in easily accessible locations.
- 7. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all County of Humboldt and State of California regulations;
- 8. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations.
- 9. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations.
- 10. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations.
- 11. **Pesticide Management Plan** shall be developed with training for **Private Applicator Certification**, and a written copy of the plan and certification shall be on premises at all times in accordance with all applicable Humboldt County and State of California regulations.

D. Employee Safety Practices

Farm operations and processing operations shall implement safety protocols to protect the health and safety of its employees. ADA compliant processing facility, restroom, and parking shall be provided. All employees shall be provided with adequate safety training relevant to their specific job functions, which may include:

- 1. Emergency action response planning.
 - a. Managers shall be trained and certified in basic CPR & 1st Aid.
 - b. CPR & 1st Aid Kit Stations shall be provided within the cultivation areas, bathroom, and drying facility.
 - c. Employees with known allergies that could be a health concern in an agricultural setting shall inform management, and if require an EpiPen, shall carry said provisions with them at all times while on-site.
 - d. If feasible, a working phone connection or emergency call button connected to a monitored security system shall be put into use.
 - e. Emergency call buttons, depending on circumstances, may or may not be placed within the greenhouses and processing facility.
 - f. Employees shall be provided with handheld communication devices with a secure channel for on-site use.
- 2. Employee accident reporting and investigation policies.
 - a. All accidents shall be reported to management.
 - b. Management shall investigate and keep written reports of accidents.
 - c. If required, the employee shall be immediately sent to medical services for assistance, and written records kept on file.

- d. Reporting to authorities shall be according to the requirements of law.
- 3. Fire prevention.
 - a. CalFire Fire Safe regulations (Title 14 Code of California Regulations: Division 1.5, Chapter 7, Subchapter 2, Articles 1-5) shall be met.
 - b. Processing facilities shall meet F-1 Occupancy standards.
 - c. Climatized greenhouses or finished agricultural building with insulation, heating, or air conditioning shall meet U Occupancy standards.
 - d. All employees shall be trained with fire safe methods and in the proper use of fire extinguishers.
 - e. Fire extinguishers shall be available in the cultivation areas and drying facility in the advent of an emergency.
 - f. Fire extinguishers shall be maintained and certified on an annual basis.
 - g. The dedicated water storage tank and nipple shall be inspected on an annual basis to ensure viability.
- 4. Hazard communication policies, including maintenance of material safety data sheets (MSDS).
 - a. Employees shall be trained in the proper handling of all hazardous materials, if any are ever used.
 - b. Employees shall be provided secure communication devices for communication and emergencies.
 - c. MSDS of any applicable hazardous materials shall be posted visibly on-site at all times.
- 5. Materials handling policies.
 - a. Employees shall be trained on handling cannabis and other related materials on an annual basis.
- 6. Job hazard analyses.
 - a. Employees may be exposed to agricultural related risks and informed of such.
 - b. Within the first year of operations on-site risks shall be assessed by an independent expert to reduce job hazards within a risk management plan to ensure OSHA compliance.
 - c. The risk management plan shall be implemented to reduce identified issues.
- 7. Personal protective equipment policies; including respiratory protection.
 - a. The employer shall provide personal safety equipment for use such as OSHA certified safety glasses (tinted and clear), hardhats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection.
 - b. Employees shall be trained in the use, expected to make use, and have ample access to personal protective equipment provided by Bear Butte Farms.
 - c. Storage areas for personal safety equipment shall be provided.

E. Emergency Contacts

The Humboldt Cure operations and processing facilities shall visibly post and maintain an emergency contact list which includes at a minimum:

1. Operation manager contact(s):
 - a. Manager: John Schenk (702)245-5476
2. Emergency responder contact(s):
 - a. EMERGENCY CALL 911
 - b. Nonemergency Sheriff: (707) 445-7251
 - c. Kneeland Volunteer Fire Protection District: (707)442-3252
 - d. City Ambulance: (707) 445-4907
3. Poison control contact(s):
 - a. EMERGENCY CALL 911
 - b. Poison Control Centers 1-800-222-1222

F. Schedule of Operations

Operations shall follow a fairly consistent annual set schedule of events and record keeping of past water use through meters was not undertaken. (Table 2). There shall be thirty-three thousand two hundred thirty-seven square feet (33,237¹²) outdoor and six thousand square feet (6,000') mixed- light cultivation. Water use was monitored in 2018 and 2019 with an average annual water use of five hundred fifty thousand gallons (550,000gal) for operations utilizing drip irrigation and hand watering at an agronomic rate within above ground planters.

Table 2: (OD) Outdoor & (ML) Mixed Light Schedule of Activities					
Active Months	Both Vegetation	Outdoor Flowering	Mixed Light Flowering	Both Harvests	Both Drying
Jan					
Feb					
Mar					
Apr	ML Planted				
May	ML OD Planted		Mid-May		
Jun	OD		First		
Jul	OD		Cycle	ML	ML
Aug	OD ML Planted	Variable			
Sept		Strain	Second	OD	OD
Oct		Dependent	Cycle	ML & OD	ML & OD
Nov					
Dec					
Totals	5 Months	2 to 3 Months	5 Months	3 Harvests	3 Months

G. Water Source Plan

Past operations were dependent upon diversion from the nine-acre (9ac) pond, which is the headwaters of Morgan Creek, a Class II stream tributary of the Mad River. Early in the compliance process the diversion was registered by TRC for cultivation

diversion was registered with DWR S025999 on January 03, 2017. DFW issued an LSAA 1600 for the pond diversion on June 19, 2017 with 1600-2016-0586-R1.

Fisch Drilling successfully completed installation on November 6, 2018 of a one hundred seventy feet (170') deep ten-inch (10") diameter well under HCDHHS Permit #18/19-0295 and registered under DWR WCR2018-010085. The well is located at latitude 40.61732° longitude -123.74354°, provides thirty gallons per minute (30GPM), water is struck at a depth of fifty-five feet (55'), and has a drawdown

of one hundred sixteen feet (116'). Water is struck within brown sandstone under a twenty-four feet (24') thick silt clay /siltstone cap and continues through another clay layer into sandstone, and ends in shale. It is not hydrologically connected to surface water as it is capped by a significant geologic formation of silty clay and stone with the screen well past this layer in deep sandstone. Power is provided by a solar panel system.

Table 3: Well Geologic Log		
Depth from Surface	Geologic Formation	Water
Surface to 4ft	Top Soil	No Water
4ft to 16ft	Silty Clay	
16ft to 28ft	Siltstone	
28ft to 55ft	Brown Sandstone	10in Steel Blank Case
55ft to 62ft	Brown Sandstone	55ft Water
62ft to 68ft	Brown Clay	65ft Screen
68ft to 120ft	Brown Blue Sandstone	116ft Drawdown
120ft to 151ft	Blue Sandstone	10in Steel Screen Case
151ft to 170ft	Shale	

Since 2018 the well has provided irrigation water for cultivation. The use of the spring and ponds were registered as required due to past use, though intent of the project is to continue using the well into the foreseeable future, and DFW LSAA 1600-2016-0586-R1 was amended on May 21, 2019 to abandon the diversion. The SWB WRRP and DFW LSAA 1600 further identifies the required installation of an energy dissipater to the outflow of the pond to Morgan Creek.

The project SHALL NOT utilize the Spring and Ponds:

1. ***The ponds shall be used for livestock, aesthetics, and wildlife purposes.***
 - a. Diversion was registered with DWR S025999 on January 03, 2017.
 - b. DFW issued an LSAA 1600-2016-0586-R1 for the pond diversion on June 19, 2017.
 - c. Diversion abandoned with DFW LSAA 1600-2016-0586-R1 was amended on May 21, 2019.

The project SHALL utilize the Well:

1. ***The well is not hydraulically connected to surface waters, capped by a twenty-four feet (24') thick silt clay /siltstone cap, and water is from the sandstone aquifer.***
 - a. Installed by Fisch Drilling under Humboldt County Permit #18/19-0295 at latitude 40.61732° longitude -123.74354°.
 - b. Ten-inch (10") diameter well which is one hundred seventy feet (170') deep into sandstone and shale, provides thirty gallons per minute (30GPM), water

is struck at a depth of fifty-five feet (55'), and has a drawdown of one hundred sixteen feet (116').

The following are compliance requirements for Water Use:

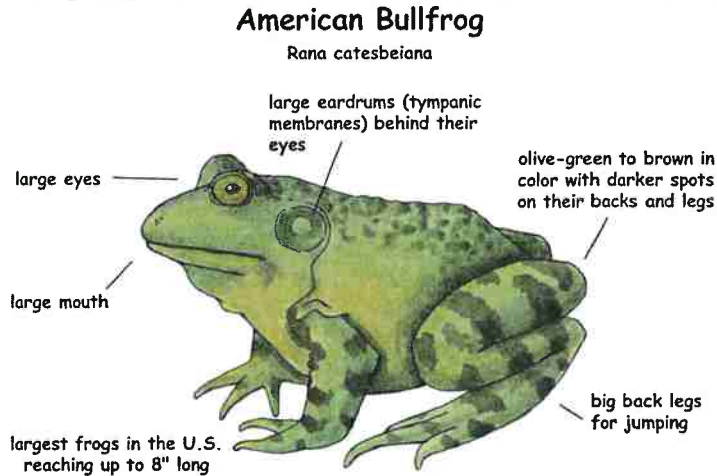
1. State Water Board compliance with all measures identified within the ***Site Management Plan shall be implemented.***
 - a. ***Water Meter on the Well has been installed*** which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.
 - b. ***Irrigation water shall be used at an agronomic rate consistent with the Site Management Plan.***
2. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.

H. Pond Plan

The spring and ponds are an old part of the original homestead and noted on USGS maps. Both are headwaters for Class II Streams which are hydrologically connected to the Mad River a salmon bearing waterway. The intent of the ponds include livestock, esthetic, and wildlife uses and shall not be used for cultivation. Regardless of use, there is the potential for the ponds to provide habitat for invasive species, and SWB Site Management Plan BMP #86 requires at the minimum for the property an invasive species management plan for the American bullfrog (*Lithobates catesbeianus* or *Rana catesbeiana*).

Within Humboldt county the American bullfrog is highly invasive and they have the potential to impact local wildlife particularly salmon. They are a non-native invasive amphibious frog species with an olive green back, sides blotched with brownish markings, a whitish belly spotted with yellow or grey, upper bright green lip, and yellow or white throat (Figure 7). The species inhabits permanent freshwater ponds and is usually found along the water's edge. Bullfrog tadpoles are green to yellow in color with small, dark spots on their backs, and can grow up to 6 inches in length (Figure 8). Bullfrogs have a distinctive croak, which is an indicator of an invasion, and can be heard here: <https://www.youtube.com/watch?v=wbXItUDliuo>

Bullfrogs have voracious appetites and will eat anything they can fit into their mouths including native species such as birds, bats, rodents, frogs, salamanders, lizards, snakes, and turtles. Bullfrog tadpoles mainly eat algae, aquatic plant material, and invertebrates, but they will also eat the tadpoles of other frog species. As a result of these feeding behaviors, at all life stages bullfrogs' prey upon and are able to out-compete



native species. They are also a known carrier of chytrid fungus which causes a potentially fatal skin disease in native amphibians called chytridiomycosis.

Figure 7: Bullfrog Example
Source:

www.exploringnature.org

©Sheri Amsel

[https://www.exploringnature.org/graphics/color diagram/bullfrog diagram.jpg](https://www.exploringnature.org/graphics/color%20diagram/bullfrog%20diagram.jpg)



Figure 8: Bullfrog Tadpole Example to Scale

Source: <http://www.californiaherps.com/frogs/images/lcatesbeianusocia1013.jpg>

The life cycle of the bullfrog and their invasion can be interrupted by draining the ponds every two (2) years to dry out eggs and tadpoles (Figure 9). Bullfrogs begin its life cycle as an egg laid in tiny jelly-like mass with a ten thousand (10,000) to twenty thousand (20,000) brood. Within eight (8) days of being laid the eggs hatch and live as tadpoles with gills and tails for the two (2) weeks. It will take three (3) years for froglets to mature before they can mate and lays eggs to once begin the cycle.

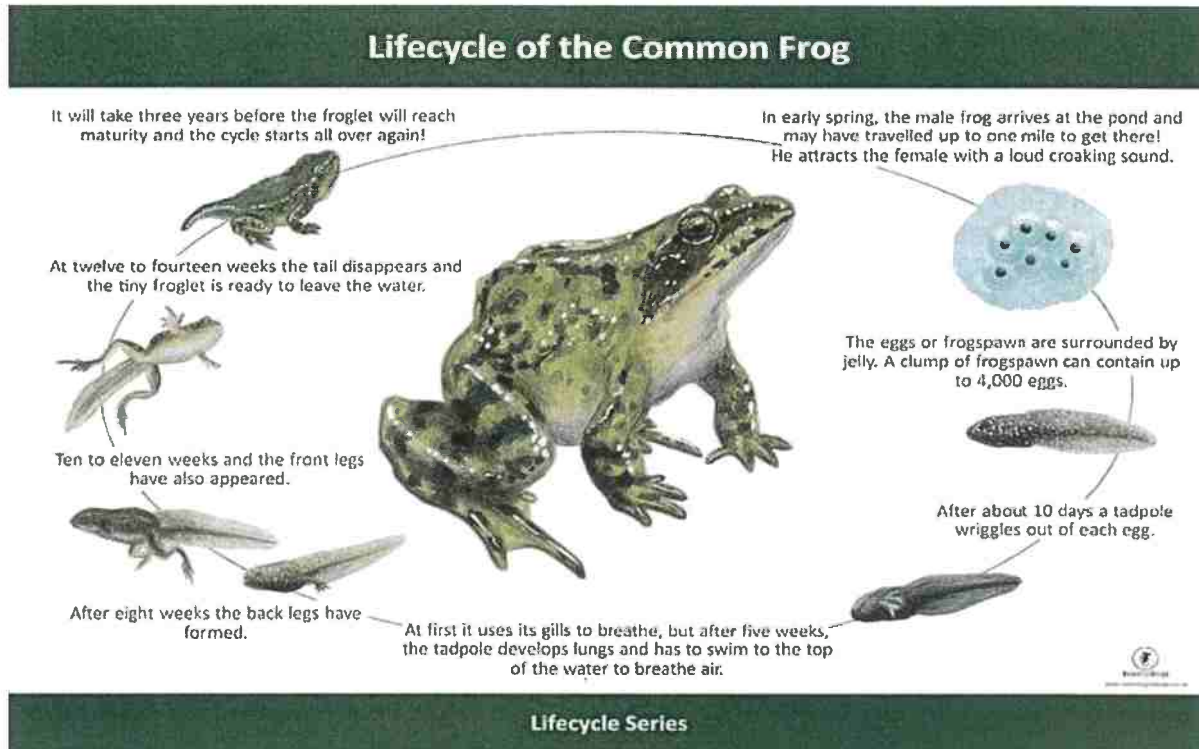


Figure 9: Bullfrog Life Cycle

Source: https://www.naturesigndesign.co.uk/wp-content/uploads/2015/01/Sign_Frog_Lifecycle1.jpg

The following are compliance requirements for the Pond:

1. ***Invasive Species Management Plan*** shall be prepared by a Qualified Biologist for all ponds with a copy kept on premises at all times.
 - a. The plan shall include, at a minimum, an annual survey for bullfrogs and other invasive aquatic species. If bullfrogs or other invasive aquatic species are identified, eradication measures shall be implemented under the direction of a Qualified Biologist qualified biologist, if appropriate, after consultation with DFW (Fish and Game Code §6400). Eradication methods can be direct or indirect. Direct methods may include hand-held dip net, hook and line, lights, spears, gigs, or fish tackle under a fishing license (Fish and Game Code §6855). An indirect method may involve seasonally timed complete dewatering and a drying period of the off-stream storage facility

under a Permit to Destroy Harmful Species (Fish and Game Code §5501) issued by DFW.

- b. **Black Bass Invasive Species Plan** has been drafted by TRC and implemented since 2017. Black bass have for the most part been eradicated from the pond and the plan shall continue to be implemented until such time that TRC or DFW deems the project a success.

I. Water Storage Plan

It is estimate that the project shall use approximately ~~two hundred twenty five thousand gallons (225,000gal)~~ ^{713,000 gallons} per year for cultivation utilizing drip irrigation at an agronomic rate within above ground planters of water. A total of forty-five thousand gallons (45,000gal) of hard poly water storage tanks has been developed on the parcel to support cultivation and firefighting purposes. This amount of storage has been found to be sufficient to meet operational needs and should reduce potential drawdown on groundwater sources.

The project shall utilize the following minimum Water Storage:

1. **Ten (10) hard poly tanks totaling fifty thousand gallons (50,000gal) of hard poly water storage tanks.**
 - a. Seven (7) five thousand gallon (5,000gal) hard poly water storage tanks totaling thirty-five thousand gallons (35,000gal) shall be for cultivation.
 - b. Three (3) five thousand gallon (5,000gal) hard poly water storage tanks totaling fifteen thousand gallons (15,000gal) shall be for dedicated fire suppression.

The following are compliance requirements for Water Storage:

1. **Agricultural Exempt Permits** shall be submitted to the Humboldt County Building Department for the water storage tanks.
2. State Water Board compliance with all measures identified within the **Site Management Plan shall be implemented.**
 - a. **Installation of a Water Meter on the Well** which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.
 - b. **Installation of Water Meter on the Outlet of the Water Tanks** which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.
 - c. **Irrigation water shall be used at an agronomic rate consistent with the WRRP.**
3. **Three (3) five thousand-gallons (5,000gal) tanks of water shall be dedicated for CalFire Fire Safe purposes and not connected to the Cultivation Area.**
 - a. Three inch (3") reflectorized blue dot shall be installed on an address sign upon the gates.
 - b. Three inch (3") reflectorized blue dot shall be installed upon the fire suppression tanks or fire hydrant.

- c. A two and one-half inch (2½") or four and one-half inch (4½") N.H. male fitting for a fire house connection shall be made available on the fire water storage tank or a remote fire hydrant connection with said fitting at least eighteen inches (18") above grade
 - d. The placement of a tank with a hose fitting or a fire hydrant connection shall be between four feet (4') and twelve feet (12') from the roadway.
 - e. Tank and fire hydrant placement shall be at least fifty (50') from buildings.
 - f. Tank and fire hydrant placement shall be at least eight feet (8') from vegetation.
 - g. Fire suppression tanks shall be monitored for water level, topped off on a monthly basis if necessary, and a direct connection to the well with shut-off valve provided.
 - h. All fire hydrant connections shall be maintained for proper fit and function.
4. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.

J. Roads

Operations shall require roads are suitable for commercial agricultural use. Roads have many overlapping regulations and agency jurisdiction, including but not limited to, the County, CalFire, DFW, and SWB. Improvements identified within the Road Evaluation(s), DFW 1600 LSA, and Site Management Plan shall need to be implemented while meeting Humboldt County Code and CalFire SRA requirements.

CalFire and Humboldt Code prefer a Category 4 Road Standard which is twenty feet (20') wide, two (2) lane, on a slope less than sixteen percent (>16%), inside curve radius of fifty feet (50'), and forty feet (40') radius turnarounds or forty feet (40') Slip-T turnarounds. Should the physical landscape not allow for a Category 4 Road then minimums standard Humboldt County and CalFire allows are fourteen feet (14') wide with turnouts every four hundred feet (400') on a slope less than sixteen percent (>16%). On-site parking shall be required to occur in dedicated off-street locations to keep roadways clear at all times for emergency vehicle access.

The project shall meet the following for Roads:

- 1. Roads to the property shall meet functional Category 4 Road Standards.
- 2. All driveways shall meet Category 2 Road Standards.
- 3. Any ROW entrances shall be to code requirements for approach and departure.
- 4. Two (2) dedicated ADA off-street parking stalls shall be a minimum of seventeen feet by eighteen feet (17'x18') with five feet by eighteen feet (5'x18') walkway on concrete pads with two percent or less (<2%) slopes.
- 5. Six (6) standard off-street parking stalls shall measure a minimum of ten feet by eighteen feet (10'x18').
- 6. The property shall be addressed and the number posted on the driveway.
- 7. Gates shall have a three inch (3") red reflector on both sides.

8. Emergency vehicle turnarounds shall be marked with white reflectors and remain clear at all times.

The following are compliance requirements for the Roads:

1. *The main roads shall meet the Road Evaluation recommendations as performed by DTN Engineering on May 8, 2019 as required by the County.*
2. *The driveway shall meet the most environmentally superior recommendation stated within the SWB WRRP and DFW LSAA §1600 performed by TRC, or Road Evaluation performed by DTN Engineering on May 8, 2019, to minimize impacts to cultural resources as required by the County.*
3. *DFW §1600 LSA requirements shall be implemented with the replacement of three (4) culverts and continued maintenance.*
4. *State Water Board compliance with all measures identified within the Site Management Plan shall be implemented.*
5. **Should it be required to grade over fifty yards (<50yd) of material OR grade on a slope greater than fifteen percent (<15%) then the following applies:**
 - a. Grading plan which shall be designed by a licensed and qualified engineer.
 - b. Grading permit which shall be submitted to the Humboldt County Building Department.
 - c. Road construction shall be undertaken by a licensed and qualified contractor between April 15 to October 31.
6. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
 - a. Shall incorporate a road maintenance plan to maintain compliance with road standards required by Humboldt County, CalFire, DFW, and SWB.

K. Power Plan

Operations shall be powered by two (2) EPA Tier 4 Generators totaling seventy kilowatts (75kW), consisting of a fifty-kilowatt (50kW) unit at the mixed light cultivation area, and a twenty-five kilowatt (25kW) for the processing building. The generators shall be housed within sheds. A solar panel system at the front of the property supplies power to run the well pump.

The project shall utilize the following Power Sources:

1. Two (2) EPA Tier 4 Generators totaling seventy kilowatts (70kW) housed in agriculturally exempt sheds.
 - a. Fifty kilowatt (50kW) generator for cultivation area.
 - b. Twenty-five-kilowatt (25kW) generator for processing area.
2. Solar panels for the well.

The following are compliance requirements for Power:

1. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install*** the generators, switch box, conduit, and outlets to be utilized by commercial operations.
2. ***Agricultural Exempt Permits*** shall be submitted to the Humboldt County Building Department for the generator storage sheds.

L. Soils and Compost Plan

Protection from overuse of inputs and reuse of these soils shall be a key component of operations to minimize overall costs and reduce likelihood of environmental spill. All farming shall use natural organic materials with mixing, tilling, or amending of soils occurring within containers or the compost area. All fertilizers shall be stored in designated areas as recommended by the manufacturer.

Soils shall be reused and composted in a secure area with cannabis waste. No dumping off-site shall occur except at authorized waste management facility. Cover crops shall be utilized when not in cultivation for a month or more to reduce soils loss. Straw and other erosion control methods shall be placed on the ground surrounding the cultivation areas.

Crossland Management recognizes the benefits of water conservation and soils management to their business, community, watershed, and fishery. Environmentally friendly good neighbor policies shall be developed and implemented. These include:

1. A nitrogen plan shall be developed and implemented to prevent subsurface nutrient release with the assistance of a licensed soil scientist.
2. All cultivation shall utilize agricultural soils in above ground airpots (smartpots).
3. All bare soils shall be covered soils with straw, ground cloth, or cover crop such as clover.
4. Operations shall be metered as required by the State Water Board.
5. Operations shall utilize drip irrigation controlled by a timer and hand watering as necessary.
6. A detailed monthly schedule of watering activities shall be developed and conspicuously posted on-site.
7. Soils and vegetated matter shall be reused, composted on-site, and no dumping off-site shall occur.
8. Composting shall consist of a dedicated area and vegetated matter shall be chipped into an inconsumable humic mix.
9. Other methods of soil and plant moisture analysis may be implemented including the use of independent soil diagnosis, hygrometers, infrared cameras, and computerized sensors.

The State of California and Humboldt County require that the project be in compliance with the California Integrated Waste Management Act through the use of a Cannabis Waste Management Plan. All organic and solid wastes shall be collected and disposed of properly on or off site as allowed by law. Due to project site remoteness the waste plan shall focus on self-haul of solid waste and recycling. Cannabis waste shall be securely disposed on-site by composting within a static aerated or bin style compost pile

and when finished mixed back into cultivation soils (Figure 10). A compost bin can be converted into hybrid static aeration by installing perforated pipe vertically every couple feet which will reduce labor required for turning.

All cannabis waste shall be stored in a secure waste receptacle, or secured area, and disposed of in accordance with local and state regulations, CERCC, and CWMP. Public access to the designated cannabis waste receptacle or area shall be strictly prohibited. All commercial solid waste shall be stored separately from cannabis waste in disposal bins secure from wildlife and watershed discharge, divided out from trash and recyclables, and disposed in accordance local and state regulations, CERCC, and CWMP. All hazardous waste regulated by the Integrated Pest Management Plan shall be disposed of properly utilizing protocols within that plan in compliance with all local and state regulations.

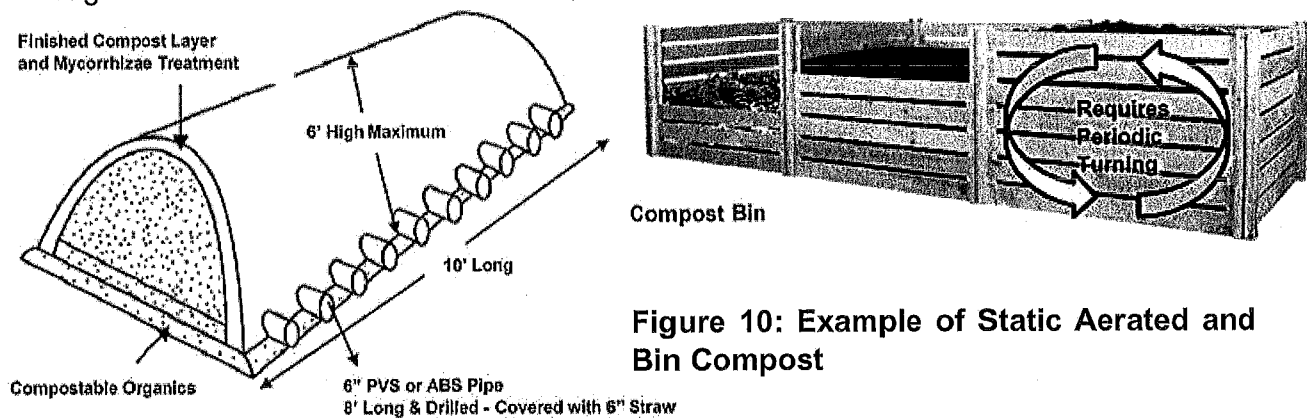


Figure 10: Example of Static Aerated and Bin Compost

The following are compliance requirements for Soils:

1. ***Installation and utilization of a Static Aerated Compost Pile, Compost Bin, and/or a combination of the two.***
2. State Water Board compliance with all measures identified within the ***Site Management Plan*** shall be implemented.
3. ***Fertilizers stored in designated areas and maintained per manufacturer recommendations.***
4. ***Cannabis Waste Management Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
5. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

M. Cultivation Plan

Operations shall be a thirty-three thousand two hundred thirty-seven square feet (33,237'²) outdoor and six thousand square feet (6,000'²) mixed light greenhouse cultivation. Cultivation shall be confined to a single centralized area on slopes less than fifteen percent (<15%) slopes within airpots placed upon geotextile fabric to protect archeological resources. Production is intended for the adult recreational market as flower

for distribution and/or bulk for extraction purposes. Operations shall meet all local and state regulatory requirements.

Cultivation is located within an enclosed centralized area with four (4) activity zones:

1. Upper twenty thousand three hundred fifty square feet (20,350'²) one hundred ten feet by one hundred eighty-five feet (110'x185') outdoor in four feet (4') airpots.
2. Middle ten thousand five hundred thirty (10,530'²) eighty-one feet by one hundred thirty feet (81'x130') outdoor in four feet (4') airpots.
3. Middle six thousand square feet (6,000'²) mixed- light DEP cultivation within five (5) existing one thousand one hundred fifty-two square feet (1,152'²) and measure twelve feet by ninety-six feet (20'x96') Ag Exempt greenhouses using airpots.
4. Lower two thousand three hundred fifty-seven (2,357'²) twenty-three one-half feet by one hundred feet (23.5'x100') outdoor in four feet (4') airpots.

A cultural resources investigation was undertaken by William Rich, M.A., RPA of William Rich and Associates in May 2018 which located multiple archaeological resources upon the property. Cultivation is located upon a culturally sensitive area with archeological resources related to hunting and gathering.

The report recommendation is to avoid ground disturbing activity in identified areas of archeological resources by capping with geotextile cloth, using above ground planters, and temporary in design greenhouses. Given these conditions, cultivation "will not cause a substantial adverse change in the significance of the identified archaeological sites". In ground planting was halted in 2018, geotextile cloth installed, cultivation placed within above ground planters, and greenhouses installed without ground disturbance.

TRC also conducted a wetland delineation. Using on the ground measurements and higher accuracy satellite imagery it was determined the outdoor cultivation area is within one hundred fifty feet (150') from the nine-acre (9ac) pond and associated wetland. The cultivation areas meet the one hundred feet (100') setback requirements of the NCRWQB 2015 regulations, though, updated County SMA and SWB require cultivation to be located further than one hundred fifty feet (150'), and therefore necessitates an on-site relocation.

The project shall utilize the following Cultivation Areas:

1. ***All cultivation shall occur upon geotextile cloth, within above ground planters, and use Ag Exempt greenhouses without foundations.***
2. ***Removal and on-site relocation of forty-eight (48) plants within a one thousand nine hundred forty-four square feet (1,944'²) outdoor full sun cultivation area measuring twenty-four feet by eighty-one feet (24'x81') within the one hundred fifty feet (150') wetland and pond setback.***
3. ***Three (3) outdoor areas equal to thirty-three thousand two hundred thirty-seven square feet (33,237'²).***

- a. Upper twenty thousand eight hundred forty-four and one-half square feet (20,844.5'²) one hundred ten feet by one hundred eighty-nine and one-half feet (110'x189.5') outdoor in four feet (4') airpots.
 - b. Middle eight thousand five hundred five square feet (8,505'²) eighty-one feet by one hundred five feet (81'x105') outdoor in four feet (4') airpots.
 - c. Lower three thousand eight hundred eighty-five (3,885'²) thirty-eight and eighty-five tenth feet by one hundred feet (38.85'x100') outdoor in four feet (4') airpots.
 - d. Cultivation shall occur within four feet (4') airpots with two feet by three feet (2'x3') spacing around each plant.
4. ***Five (5) existing Ag exempt mixed light DEP greenhouses equal to six thousand square feet (6,000'²) mixed- light.***
- a. Removable greenhouses shall equal one thousand one hundred fifty-two square feet (1,152'²) and measure twelve feet by ninety-six feet (20'x96') each without foundations.
 - b. Lights shall be utilized at a rate of six watts of less per foot (<6w/ft)
 - c. Cultivation shall occur within airpots.
5. ***All greenhouses shall meet the following requirements:***
- a. Be wired by a Licensed Electrician under permit.
 - b. Not be air conditioned or actively heated.
 - c. Utilize ventilation fans.
 - d. Utilize timers for lights and fans.
 - e. Utilize Light Deprivation (DEP) covers.

The following are compliance requirements for the Cultivation Area:

- 1. ***Agricultural Exempt Permits*** shall be submitted to the Humboldt County Building Department for the greenhouses and fertilizer storage sheds.
- 2. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install*** the generator, switch box, conduit, and outlets to be utilized by commercial operations.
- 3. ***Construction shall occur after April 15*** as required by Humboldt County Building Department.
- 4. State Water Board compliance with all measures identified within the ***Water Resources Protection Plan (Site Management Plan)*** shall be implemented.
- 5. ***DFW §1602 LSA compliance.***
- 6. ***Dark Sky Plan*** shall be developed and implemented.
 - a. Greenhouses shall utilize DEP covers.
 - b. Nursery lighting shall utilize timers.
 - c. A sunrise/sunset calendar shall be posted on-site.
 - d. Artificial lighting shall not be visible from outside of the nurseries at night after sunset or before sunrise.

- e. **Standard Operating Procedures that incorporate a Dark Sky Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all Humboldt County and State of California regulations.
- 7. **Track & Trace** in accordance with the policies of County of Humboldt and State of California.
 - a. Unique Identifier Designations (UID) are required for each mature plant.
 - b. A unique harvest batch name shall be created and associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
 - c. UIDs shall be attached to the main stem and placed in a position so it is visible within clear view standing next to a mature plant.
 - d. UIDs shall be kept free from dirt and debris.
 - e. UIDS are prohibited from being removed from the mature plant to which it was attached and assigned until the plant is harvested, destroyed or disposed.
 - f. Cannabis plants maintained outside of the designated Cultivation Area are prohibited from flowering. Should plants outside of the canopy area(s) begin to flower, a UID shall be applied, the plants shall be moved to the designated Cultivation Area without delay and reported in the Track-and-Trace system.
- 8. **Permit to Operate** the generator obtained from the Local Air District.
- 9. **Fertilizers stored in designated areas and maintained per manufacturer recommendations.**
- 10. **Nitrogen Management Plan shall be developed by a Qualified Professional**, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County, State of California, and Federal regulations.
- 11. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- 12. **Pesticide Management Plan** shall be developed and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- 13. **Private Applicator Certification** shall be undertaken with the Humboldt County Agricultural Commissioner.
- 14. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
- 15. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
- 16. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

17. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
18. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

N. Appurtenant Nursery Area

Cultivation shall be supported by a single on-site appurtenant nursery area equal to three thousand nine hundred square feet (3,900'²) in order to meet CDFA license space separation and operational requirements. Propagation and holding of immature plants shall occur within thirty feet by one hundred thirty feet (30'x130') Ag Exempt greenhouse without a foundation upon geotextile fabric. This area shall occur separately outside of the canopy area of cultivation where only potted immature plants are held twice a year.

The past two thousand four hundred square feet (2,400'²) nursery greenhouse measuring twenty-four feet by one hundred feet (24'x100') shall be removed. Its location meets the one hundred feet (100') setback requirements of the NCRWQB 2015 regulations. With updated County SMA and SWB setbacks of one hundred fifty feet (150') necessitates an on-site relocation. It shall be removed and relocated within the three thousand nine hundred square feet (3,900'²) nursery outside of the riparian setback area.

The project shall utilize the following Appurtenant Nursery Area:

1. ***Removal and on-site relocation of existing two thousand four hundred square feet (2,400'²) nursery greenhouse measuring twenty-four feet by one hundred feet (24'x100') within the one hundred fifty feet (150') wetland and pond setback.***
2. ***Three thousand nine hundred square feet (3,900'²) greenhouse measuring thirty feet by one hundred thirty feet (30'x130') for a nursery without a foundation upon geotextile fabric.***
 - a. Immature plants shall be held within pots until transferred to the cultivation area.
3. ***All greenhouses shall meet the following requirements:***
 - a. Be wired by a Licensed Electrician under permit.
 - b. May be actively or passively heated.
 - c. Not be air conditioned.
 - d. Utilize fans for ventilation.
 - e. Utilize low wattage efficiency lighting as feasible.
 - f. Utilize timers for lighting and fans.
 - g. Utilize DEP covers.

All compliance requirements as listed for the Cultivation Area are applicable to the Appurtenant Nursery Area.

O. Processing Plan and Wastewater Management

Operations shall be based upon a full sun outdoor and a dual season mixed light DEP harvests with on-site Ag Exempt and F-1 Occupancy Support Facilities to meet operational, County, and State requirements. Intent is to process cannabis on site including bucking within mature canopy areas, wet weighing and drying by the cultivation area, dry trimming and packaging in a separate building, and self-transport product to distributors. Product may also be live harvested for extraction and picked up or self-transported to a manufacturer.

Three structures shall be used to support the processing of harvested cannabis for flower product intended for the adult recreational market by the cultivation area and the old homestead. Plants shall be bucked in the cultivation area of compostable material and taken to two (2) adjacent Ag Exempt facilities for bucking, weighing, and drying to maintain license separation as required by CDFA. After drying the harvest shall be moved to the homestead F-1 Occupancy administrative holding facility within a retrofitted two-story structure for trimming, weighing, packaging, labeling, and storage within the first floor; the second floor will be used for non-cannabis related activities or used by employees.

All building development of Ag Exempt and F-1 Occupancy structures shall meet Humboldt County Building Code and California Codes, including CDFA regulations in order to preserve the health and safety of the employees and the public. Both processing facilities shall be powered by the Tier 4 generators, provided potable water from the well, and be rest areas. The F-1 Code trimming facility shall house an ADA restroom, whereas the Ag Exempt Code drying building shall have an adjacent ADA restroom outside, and both connected to separate permitted septic systems.

The project shall utilize the following Processing Facilities:

1. ***Replacement of existing forty feet by one hundred feet (40'x100') temporary four thousand square feet (4,000²) tarp drying facility with a permanent Ag Exempt building for wet weighing and bulk drying facility.***
2. ***New Ag Exempt two thousand four hundred square feet (2,400²) forty feet by eighty feet (40'x80') wet weighing and bulk drying facility.***
 - a. Interior shall not be finished with insulation or drywall.
 - b. Interior shall not be air conditioned or heated.
 - c. Interior may have connected water for a faucet and sink connected to the septic system.
 - d. Interior may be connected to electricity via the adjacent Tier 4 fifty-kilowatt (50kw) generator for basic lighting and outlets for ventilation or drying fans.
 - e. External ADA restroom and internal breakroom.
 - f. Dedicated ADA off-street parking stall shall be a minimum of seventeen feet by eighteen feet (17'x18') with five feet by eighteen feet (5'x18') walkway on concrete pad with two percent or less (<2%) slope.
 - g. Three (3) standard off-street parking stalls shall measure a minimum of ten feet by eighteen feet (10'x18').

3. **Existing two thousand four hundred fifty square feet (2,450')² thirty-five feet by seventy feet (35'x70') two-story structure to be retrofitted for trimming.**
 - a. First (1st) floor shall need retrofitting for F-1 Occupancy and ADA to be used for dry trimming, weighing, packaging, labeling, and product storage.
 - b. Second (2nd) floor shall be storage area not be used by employees or associated with cultivation.
 - c. Internal ADA restroom and breakroom.
 - d. Dedicated ADA off-street parking stall shall be a minimum of seventeen feet by eighteen feet (17'x18') with five feet by eighteen feet (5'x18') walkway on concrete pad with two percent or less (<2%) slope.
 - e. Three (3) standard off-street parking stalls shall measure a minimum of ten feet by eighteen feet (10'x18').

The following are compliance requirements for the Processing Plan:

1. **Building Permit shall be submitted to the Humboldt County Building Department for the processing facilities, generators, and restrooms connected to septic.**
2. **Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install** the generator, switch box, conduit, and outlets to be utilized by commercial operations.
3. **Licensed Engineer shall perform a Humboldt County Road Evaluation Report.** Should grading of over fifty yards (<50yd) of material or be located on a slope greater than fifteen percent (<15%) then the following applies:
 - a. Grading plan for internal roads which shall be designed by a licensed and qualified engineer to meet a minimum Category 2 Road Standard.
 - b. Grading permit shall be submitted to the Humboldt County Building Department.
 - c. Road construction shall be undertaken by a licensed and qualified contractor between April 15 to October 31.
4. **Track & Trace** in accordance with the policies of County of Humboldt and State of California.
5. **Permit to Operate** the generator obtained from the Local Air District.
6. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
7. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations. Additionally, this plan shall incorporate:
 - a. Processed and dried cannabis procedure for weighing, packaging, labeling, and deposited in accordance with all applicable County of Humboldt and State of California requirements.

- b. All work surfaces and equipment maintained in a clean and sanitary condition in accordance with all applicable County of Humboldt and State of California requirements.
 - c. Prevention practices against the contamination or growth of E.coli, mold, mildew, or other microbiological agent upon or within processed cannabis.
 - d. Nitrile gloves and paper facemasks shall be used at all times.
 - e. Hygiene policies for the use and maintenance of face and hand protection equipment in good operable condition.
 - f. Hands washing methods policies to minimize activities which may introduce contamination.
8. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
 - a. Shall incorporate a road maintenance plan to maintain compliance with road standards required by Humboldt County, CalFire, and SWB.
 9. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 10. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 11. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

IV. Site Drainage, Runoff, and Erosion Control Measures

A. Site Drainage

The parcel is situated at the top of McAlvey and Black Butte Ridgeline at a general elevation of three thousand eight hundred feet above sea level (3,800'AMSL) with a northern and eastern aspect. It drains two (2) Class II/III waterways, Morgan Creek and an unnamed stream, into the Mad River midway between the Pacific Ocean and Ruth Lake (Figure 2). Overall the parcel is less than fifteen percent (>15%) through there are steep areas on the eastern side of the property.

The cultivation area is clustered on a flat with less than fifteen percent (<15%) slope at the three thousand seven hundred feet (3,700') contour adjacent to the nine-acre (9ac) pond which is the headwaters of Morgan Creek. Cultivation has been contained within airpots upon geotextile fabric. Irrigation utilizes a drip system with minimal water infiltration occurring beyond the rootzone. As such, the environmental impact is minimal, and discharge of runoff to surface waters are low risk with proper implementation of control measures as identified within State Water Board Discharge requirements.

B. Runoff and Erosion Control Measures

Crossland Management recognizes the benefits of minimizing discharge to the watershed and anadromous fisheries. The following erosion control measures are proposed to be implemented:

1. All measures of the Water Resources Protection Plan shall be implemented;
2. Training by environmental/farm professionals to further develop internal policies to minimize impacts by from farm related activities.
3. All cultivation shall utilize airpots with amending and mixing within the airpots or compost area.
4. Road surfaces shall be grade and/or graveled as needed.
5. Outdoor cultivation soils shall be above ground upon geotextile cloth, contained in airpots, and methods implemented to minimize soils loss including composting soils with organics.
6. Cover crops such as native clover and wildflowers, straw, or ground cloth shall be utilized on all bare soils; and,

C. Watershed and Nearby Habitat Protection

Crossland Management shall be utilizing the following to ensure protection of the watershed and nearby habitat:

1. A Remediation Plan shall be implemented for the on-site relocation of the southern past cultivation site.
2. All measures of the Water Resources Protection Plan shall be implemented
3. Training by environmental and farm professionals to further develop internal policies to minimize impacts by from farm related activities.
4. Soils shall be above ground upon geotextile cloth, contained in airpots, and methods implemented to minimize soils loss with all mixing occurring within the airpots or compost area.
5. All farming shall be natural organic.
6. Graveling of the driveway.
7. A locked six-foot (6') perimeter fence around the cultivation area with greenhouses which shall have doors to minimize wildlife exposure.
8. Tier 4 generators shall be less than sixty decibels (60db) from one hundred feet (100').
9. Tier 4 generator shall be enclosed and obscured from wildlife.
10. All enclosures shall have locking doors.
11. Compost bin shall be covered and contained.
12. Trash bins shall be secured.
13. Cover crops such as native clover and wildflowers, straw, or ground cloth shall be utilized on all bare soils.
14. The southern pond made available for use by wildlife.

D. Soil Management and/or Permaculture Methods.

Crossland Management shall protect from the overuse of nutrients as a key component of their business. Operations shall manage on-site soils through the following means:

1. All measures of the Water Resources Protection Plan shall be implemented.
2. A nitrogen management plan developed by a licensed soil scientist or geologist.
3. All cultivation shall utilize the current on-site soils through amending and permaculture methods.
4. All farming shall be natural organic.

5. Outdoor cultivation soils shall be above ground upon geotextile cloth, contained in airpots, and methods implemented to minimize soils loss including composting of soils with organics.
6. All amending and mixing of soils shall occur within airpots or compost area.
7. Soils and vegetated matter shall be reused, composted on-site, and no dumping off-site shall occur.
8. Composting shall consist of a dedicated area and vegetated matter shall be chipped into an inconsumable humic mix.
9. Cover crops such as clover, straw, or ground cloth shall be utilized on all bare soils.

V. Fertilizers, Pesticides, or Other Regulated Products

A. Storage Protocols

Crossland Management intends to be a natural organic farm. Operations shall not be using regulated products, such as pesticides or herbicides. The following are fertilizer storage protocols:

1. All measures of the Water Resources Protection Plan shall be implemented;
2. Temporary storage of all fertilizers or other regulated and nonregulated organic products shall occur utilizing cargo container(s) until the processing facility is constructed. Products shall be stored according to manufacturer requirements;
3. A enclosed storage shed shall be used for fertilizers with shelf and floor space for products to be stored according to manufacturer requirements;
4. Clean-up and containment protocols shall be developed and implemented to minimize discharge;
5. Clean-up and containment equipment shall be maintained in good operating condition on-site at all times; and,
6. Safe handling practices and protocols for using clean-up and containment equipment shall be developed and posted conspicuously.

B. Fertilizers and Amendments Utilized

Crossland Management shall be utilizing any or all of the following natural organic amendments and fertilizers in Table 4.

Table 4: Organic Soil Fertilizers and Amendments		
1. Bat Guano	6. Fishbone	11. MycoApply Endo Ultra *
2. Bone Meal	7. Grape Compost	13. Neem Meal
3. Cascade Worm Castings	8. Gypsum	14. Phytamin Fish 3-2-0*
4. Crab Shell	9. Kelp Meal	15. Seabird Guano
5. Epsom Salt	10. Kickstart 6-1-2*	16. Shrimp Meal
*Organic Material Review Institute listed and California Department of Food & Agriculture registered organic input material.		

C. Pesticides

Crossland Management methods and care during cultivation typically require minimal pest management, though, there may be situations requiring the potential use of any the following agriculturally exempt products in Table 5.

Table 5: Legal Pest Management Practices for Marijuana Growers in California	
Active Ingredient	Pest or Disease
Azadirachtin	Aphids, Whiteflies, Fungus Gnats, Leafminers, Cutworms
Bacillus subtilis QST	Root Diseases, Powdery Mildew
Bacillus thuringiensis subsp. aizawai or kurstaki	Moth Larvae (E.G., Cutworms, Budworms, Borer)
Bacillus thuringiensis subsp. israelensis	Fly Larvae (E.G., Fungus Gnats)
Beauveria bassiana	Whiteflies, Aphids, Thrips
Cinnamon oil	Whiteflies
Gliocladium virens	Root Diseases
Horticultural Oils (Petroleum Oil)	Mites, Aphids, Whiteflies, Thrips; Powdery Mildew
Insecticidal Soaps (Potassium Salts of Fatty Acids)	Aphids, Whiteflies, Cutworms, Budworms
Iron phosphate, sodium ferric EDTA	Slugs And Snails
Neem Oil	Mites; Powdery Mildew
Potassium bicarbonate; sodium bicarbonate	Powdery Mildew
Predatory nematodes	Fungus Gnats
Rosemary + peppermint essential oils	Whiteflies
Sulfur	Mites, Flea Beetles
Trichoderma harzianum	Root Diseases
Active ingredients that are exempt from residue tolerance requirements and either exempt from registration requirements or registered for a use broad enough to include use on marijuana. http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/cannabis_enfrmnt/pest_mgmt_practices.pdf	

VI. Operations and Safety Practices

A. Commercial Operations

Crossland Management shall be an is an “agricultural employer”, as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with §1140) of Division 2 of the Labor Code, to the extent not prohibited by law. On site-housing shall not be provided to agricultural employees.

The farm shall be owner operated employing persons for hire as allowable by law.

1. There shall be one (1) manager of the daily operations of the farm.
2. There shall be two (2) full-time employees.
3. Up to five (5) temporary part-time employees may be hired as seasonally required for planting, harvesting, or processing.
4. If ever over 20 employees are hired, they shall be allowed to unionize and negotiate a Labor Peace Agreement according to MCRSA §19322(a)(6).

Crossland Management shall 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).

At all times, employees shall have access to safe drinking water, toilets, and handwashing facilities that comply with all applicable federal, state, and local laws and regulations. On site-housing provided to employees shall not be provided.

B. Employee Safety Practices

Crossland Management operations and drying operations shall implement safety protocols to protect the health and safety of its employees. All employees shall be provided with adequate safety training relevant to their specific job functions. Further, safety needs of employees shall be a priority and implemented to the best of operational abilities.

1. Drinking water and wastewater
 - a. Potable water shall be provided from the permitted well.
 - b. Restrooms shall be connected to a permitted septic system.
2. Emergency action response planning.
 - a. Training and certification in basic CPR & 1st Aid.
 - b. A CPR & 1st Aid Kit Station shall be provided within the drying facilities.
 - c. An emergency response plan shall be designed and implemented.
 - d. A monitored security and active video camera system may be installed.
3. Fire prevention.
 - a. Fire suppression tanks shall be monitored for water level and topped off on a monthly basis if necessary.
 - b. All fire hydrant connections shall be maintained for proper fit and function.
 - c. Smoke detectors shall be installed and may be connected with a monitored security system.
 - d. The appurtenant drying facilities shall have at a minimum one (1) dry chemical fire extinguishers with a twenty-pound (20lb) capacity in each building.
 - e. Fire extinguishers may also be installed within convenient locations accessible during working hours.
 - f. Fire extinguishers shall be maintained and certified on an annual basis.
4. Hazard communication policies, including maintenance of material safety data sheets (MSDS).
 - a. Pesticide Management Plan shall be developed and a written copy of the shall be on premises at all times.
 - b. Private Applicator Certification in accordance with all applicable Humboldt County and State of California regulations.
 - c. MSDS of all pesticides used shall be on premises at all times.
 - d. A pesticides management plan shall be on premises at all times.
 - e. Training in the proper handling of all hazardous materials, if any are ever used.
 - f. If any regulated substances are ever used, MSDS of any applicable hazardous materials shall be posted visibly on-site at all times.
5. Materials handling policies.
 - a. Training in the handling of cannabis and other related on-site materials shall occur on an annual basis.
 - b. All Track and Trace requirements shall be implemented.
 - c. A transportation plan shall be developed and implemented.
 - d. Standard Operating Procedures shall be developed and implemented.
6. Job hazard analyses.

- a. Risks assessment audit shall be implemented and activities modified to reduce job hazards.
7. Personal protective equipment policies; including respiratory protection.
 - a. Certified safety glasses (tinted and clear), hats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection may be on-site and used.
 - b. Training in the use, expectations, and access to personal protective equipment.

VII. Processing Practices and Plan

Crossland Management shall utilize up to two (2) full-times and up to five (5) part-time employees who shall not be provided on-site housing by the employer. Compliant restrooms and breakrooms shall be within four hundred feet (400') of the area of operations and connected to the installed septic systems. There shall be potable water from the well provided at each facility for employee use.

Intent is to process cannabis on site. Processing includes bucking within mature canopy areas, wet weighing and drying by the cultivation area, dry trimming and packaging in a separate building, and self-transport product to distributors. Product may also be live harvested for extraction and picked up or self-transported to a manufacturer.

A. Processing Practices

Crossland Management shall implement and practice the following Processing Practices on-site at all times:

1. All work surfaces and equipment shall be maintained in a clean and sanitary condition;
2. Prevention against contamination, mold, and mildew growth on processed cannabis;
3. Facemasks and gloves shall be in good operable condition; and,
4. Hands shall be sufficiently clean when handling cannabis or use gloves.

B. Processing Plan

Crossland Management processing plan of cultivated cannabis consists of:

1. Harvesting cannabis is shall occur twice (2) a year and records kept consistent with CDFA regulations.
2. Bucking of vegetative leaf for compost use shall occur within the cultivation areas.
3. Wet weighing and drying of harvested cannabis shall only occur within the Ag Exempt drying facility.
4. Processing of product utilizing mechanical and hand trimming, weighing, packaged, labeling, and storage shall only occur within the F-1 Occupancy admin hold facility.
5. Product shall be self-transported to and/or picked up by licensed distributors.
6. Product may be harvested in bulk, frozen, and transported off-site by a manufacturer.

C. Parking and Road Usage

1. The entrance shall be engineered according to code requirements for approach and departure.
2. The driveway shall be at a minimum of ten feet (10') wide, with two feet (2') shoulders, graveled, and culverted.
3. There shall be a minimum of two (2) ADA van accessible and six (6) standard sized parking stalls.
4. Employees shall be encouraged to carpool to the site whenever possible.

VIII. Security Plan

Operations shall be conducted securely. At all times shall operations be visibly obscured, discreet, nor draw attention. The purpose of operational security is to avoid being a nuisance activity which could attract burglary, robbery, or diversion of cannabis for unlawful use.

A. Security Measures

The intention of security measures is to meet the minimum requirements to secure product while protecting the health and safety of employees and the public. The location of the site, setback of operation areas behind trees, and other features not only present natural security but also present security issues in regards to support infrastructure and law enforcement response times. More than the minimum security measures may be implemented at any time to increase the health and safety of employees and the public.

The following are Security Measures:

1. Locks shall be installed on all structures.
 - a. Commercial-grade, non-residential door locks at all points of entry and exit.
 - b. It is recommended that alarmed lock systems be considered to ensure restricted access.
2. Secure road gates shall utilize a commercial grade lock which is locked at all times. Gates and roads may be surveilled.
3. Operations shall be secured by a fence at least six feet (6') in height with a locking gate utilizing a commercial grade lock.
 - a. Fencing over six feet (>6') shall require a Humboldt County Building Permit.
4. On-site monitored security and fire system may be installed, if feasible, and accessible only to permitted individuals.
5. Digital video surveillance system, if feasible, with 1280×720 resolution connected through the internet 24/7 to a licensed alarm monitoring company.
6. Passive audible trespasser alarm system may be installed.
7. Cameras may be installed.
8. Video recording system may be installed within the processing facilities
9. Any security personnel employed must possess a valid Guard Card and be compliant with the California Department of Consumer Affairs.

The following are compliance requirements for Security:

1. **Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install** the generator, switch box, conduit, and outlets to be utilized by commercial operations.
2. **Track & Trace** in accordance with the policies of County of Humboldt and State of California.
3. **Permit to Operate** the generator obtained from the Local Air District.
4. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
5. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
6. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
7. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
8. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
9. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.