EAGLES NEST FARM

Cultivation

Operating

Procedures

2021

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APN#: 220-191-027 & 220-191-029
Eagles Nest Farms
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Contents

Part 1: Purpose of this COP document

This document provides information to demonstrate compliance with County and State laws regarding the cultivation and transfer of cannabis. In addition, this document is intended as a manual for farm personnel and provides the basis for good farm operations and compliance. As such, the COP contains policies and procedures that go above and beyond cannabis cultivation laws and regulations. These additional suggested policies and procedures outlined herein are meant to be guidelines for operations as needed.

Part 2: Farm Review

2.1 Eagles Nest Farm

Eagles Nest is a family run farm. Community values and the connection to the earth that farming provides is the basis for our family's desire to produce some of the best organic cannabis available. Like the plants, we depend on healthy organic soil to make our living, and treat it well. Like our neighbors, the fish in the Mattole, we depend on clean water. We will honor our responsibility to our watershed and community by conserving water and soil.

The farm is run by husband and wife, Chad and Jessica Whitmire. The farm is located adjacent to the Whitethorn Junction at 12600 Briceland-Thorne Rd, Whitethorn, CA. Our farm is approximately 40 acres and contains a main residence and a guesthouse rental, neither of which are used in cannabis operations. See our plot plans for further information. Our land borders the Mattole River on the South and is mostly standing timber, with native grasses.

We have partnered with Timberland Resource Consultants; 165 South Fortuna Blvd, Fortuna, CA 95540 to develop a SMP and intend to implement all of its recommendations.

Please Note: We currently have no employees. Some sections of the document are intended to be the guidelines used for future employees if and when they are hired.

2.2 Site Summary

SITE ADDRESS:
APN#: 220-191-027 & 220-191-029
12600 BRICELAND-THORNE RD, WHITETHORN, CA, 95580

PARCEL CENTROID LONGITUDE AND LATTITUDE:
40.0635, + - 123.9615

ALLOWED CULTIVATION: 13,371 SQ FT (per county CAV)
CURRENT CULTIVATION: 13,350 SQ FT TOTAL

MIXED LIGHT: 4,520 SQ FT
GREENHOUSES #1: 10' X 120', 1,200 SQ FT
GREENHOUSES #2: 20' X 116', 2,320 SQ FT
GREENHOUSES #3: 10' X 100', 1,000 SQ FT

OUTDOOR: 8,830 SQ FT
AREA 1: (11) 10' X 10' PLANTS = 1,100 SQ FT CANOPY
GREENHOUSES #4: 10' X 100', 1,000 SQ FT
GREENHOUSES #5: 10' X 128', 1,280 SQ FT
GREENHOUSES #6: 10' X 124', 1,240 SQ FT
GREENHOUSES #7: 10' X 112', 1,120 SQ FT
GREENHOUSES #8: 10' X 100', 1,000 SQ FT
GREENHOUSES #9: 10' X 40', 400 SQ FT
GREENHOUSES #10: 10' X 80', 800 SQ FT
GREENHOUSES #11: 10' X 65', 650 SQ FT
GREENHOUSES #12: 8' X 30', 240 SQ FT

EXISTING CULTIVATION FACILITIES:
MULTI USE BUILDING: 20' x 44' = 880 SQ' FIRST FLOOR, 1
6' X 20', 320 SQ FT SECOND FLOOR
PUMP HOUSE, (BUILT 2016) 8'X8', 64 SQ FT
"EAGLES NEST" RECORDS STORAGE SHED: 10'X12', 120 SQ FT
SOLID WASTE SHED: 10'X12', 120 SQ FT
FERTILIZER SHED: 10'X12', 120 SQ FT
COMPOST AREA, 8' X 8', 64 SQ FT

IMMATURE PLANT AREA A
GREENHOUSE 14: 20' X 65', 1,300 SQ FT
PARCEL SIZE: ±41 ACRES

ZONING: U (UNCLASSIFIED)
GENERAL PLAN DESIGNATION: RA 5-20

BUILDING SETBACKS (U):
FRONT: 20' SIDE: 5' REAR: 10

2.3 Permitting Goals

We own one legal parcel, comprising two merged APN's: 220-191-027 & 220-191-029. The parcels are each zoned U and had existing outdoor cultivation operations in place prior to January 1, 2016. We are seeking a permit as an existing cultivator on this merged parcel.

The County CAV has the pre 2016 cultivation areas confirmed at 13,371 square feet. We are seeking a Use Permit for continued Outdoor Cultivation of 13,350 square feet. We have Terraserver imagery from 2015 and a County CAV verifying this activity.

2.4 Cultivation Legacy and Remediation

Our crop production land has been farmland for several years. There are no concerns about previous land use related to microbial or chemical contamination of crops. There are no feedlots or municipal water treatment facilities adjacent to our property. Crop land is not susceptible to flooding. Legacy damage from logging done on the property prior to current ownership has been inspected by a third-party State Water Board representative. Remediation efforts will be determined to limit the sediment discharge risk to the creeks running through the properties. The cultivation area has been inspected as well. The cultivation flats all existed prior to current ownership, are minimally sloped, and represent minimal erosion risk to the surrounding watershed. The cultivation area will be inspected regularly for signs of erosion that would lead to sediment discharge. The SMP have more information on the priority and type of triage required. ENF is in the process of working through all triage recommendations contained in the SMP.

2.5 Roads

Most of the roads on the property were constructed in the past for timber harvesting and the rest are associated with homestead land use. The road system is generally well laid out with minimal stream crossings and roads within riparian areas. However, sites identified by TRC as needing repair to existing road surface drainage structures or addition structures installed to prevent the concentration of road surface runoff or erosion of the road surface will be addressed in the timeline prescribed by our SMP.

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

Vehicles in the production areas

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

Part 3: Environment

3.1 Soils and Spoils

Our soil is alive. We do not intend to let it die or run downslope. We currently have no spoilage. In the event of soil contamination, the spoilage is piled, covered in tarps, and surrounded by swales and bails to prevent any discharge. It is then spread, seeded, and mulched in the spring. In the event of soil contamination, the spoilage will be hauled to an appropriate facility depending on the contamination.

3.2 Water Quality

Our farm is a registered Tier 2 cultivation site per the California Regional Water Quality Control Board North Coast Region Order No. 2015-0023 Waiver of Waste Discharge Requirements and General Water Quality Certification, *WDID#: 1_12CC407503.* Our Site Management Plan (SMP), discharge logs, permits, and site maps will be found in the Pump House. See our SMP for further details about discharge mitigation and monitoring. See our site map for the location of the Pump House.

3.3 Water Sources

For cultivation related use, the farm has a permitted well, 68,000 gallons of hard water storage, and a 400,000-gallon rainwater storage pond. The rainwater and hard tank storage will more than likely cover all water used for irrigation, with the well being used as needed to cover any deficit.

For domestic use, the homes have a permitted Sanctuary Forest water tank array with 120,000 gallons of water storage capacity. We hope this demonstrates our commitment to the watershed.

"Our Storage and Forbearance program is for landowners in critical reaches of the Mattole River headwaters and tributaries. This innovative, voluntary partnership helps

landowners get the water storage capacity they need in order to give up pumping from the river during the critical dry season—and keeps that water flowing when the river needs it most."

-**Sanctuary Forest**

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

TABLE 1. ESTIMATED MONTHLY WATER USE for 2 harvests (gallons)

Water use	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
IRRIGATION	0	0	7,000	20,000	35,000	45,000	60,000	75,000	30,000	7,000	0	0
TOTAL	APPROXIMATELY 280,000 GALLONS PER YEAR (10.5 gal/sq. ft.) DEPENDING ON CONDITIONS											

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

Eagles Nest Farm practices are designed to protect the water quality and the environment from adverse effects caused by overuse of water sources and/or waste discharges and to meet all applicable state and federal water and waste discharge requirements. All potential discharge locations are monitored, and events are reported in our discharge, use and diversion logs and for annual reporting as well as:

- Before and after any significant alterations to a stream crossings, roads, or other controllable sediment discharges.
- Prior to October 15 to ensure the site is ready for storm events.
- Following any rain fall event of 3 inches or more within 24hrs

Appendix C contains best practices for water testing. Please see our SMP for additional information.

3.4 Wastewater

The property has two separate legacy septic systems with disposal fields, one at each home. Soil tests have been performed by Mother Earth Engineering to confirm the disposal field operation and to complete design work to obtain permits for their use from the Humboldt County Health Department.

Portable Toilet Spill Policy:

Portable sanitation facilities are placed with all due care to avoid any spill concerns. Care is taken to avoid any circumstance that a facility would be spilled or tipped over. If in the unlikely event that a spill or tip-over were to occur, despite all due care, then the following procedure would be followed:

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

3.5 Hazardous Materials

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

Electrical Power. The Lower House is powered via PG&E and we have a solar-inverter system that supplies electricity to the guesthouse. See site map. In the event the solar system fails, a backup generator located within an enclosed containment shed will provide power to the facilities.

List of farm machinery (fuel type):

Mowers (gasoline)
Water Pump (Gasoline)
Chain Saws/Lawn Trimmers (mixed oil/gasoline)
Water heaters (propane)

Equipment Maintenance. The larger farm equipment is serviced off site at licensed repair centers. In the event that a breakage requires servicing at the farm site, a licensed repair specialist will be called to service the equipment and will be responsible for removing any associated hazardous waste from the site. Smaller equipment such as the mowers, or lawn trimmers will be serviced off site.

Gas and Petroleum.
Petroleum products of any kind may not be stored or used within the perimeter of the farm fields. Petroleum products in small containers must be kept in approved containers with in secondary containment. Current farm procedures do not generate any used oil or other hazardous materials. In the event unanticipated hazardous materials are generated or farm procedures are changed such that hazardous materials are generated, then all refueling must take place away from produce fields to minimize the risk of petroleum contamination to the fields or produce. All above ground tanks shall be built in a manner that allow for containment of the tank contents in the event of a leak per safety standards. Any used oil, filters or other hazardous waste shall be stored in appropriate leak proof containers within secondary containment and taken to the hazardous waste facility at Eel River disposal, or the Cal Trans yard promptly. CUPA registration will be sought.

Gas or Petroleum Spill. All due care is used to avoid spills. A spill kit, if required, will be maintained on site for use in the unlikely event of a spill. All soil that has visible oil stains or petroleum odor will be dug out and contained. The contaminated soil will be disposed of in accordance with state law.

The spillage event and corrective actions can be written down in the **Field Sanitation Unit Service Log** and kept in our records at the Eagles Nest office shed.

Pesticide or fungicide spill. Wear protective gloves and face mask when cleaning up a spill.

<u>Dry spills.</u> (Granular, dust, wettable, dispersible, and soluble powder formulations)

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

Liquid spills.

1. Soak up the liquid with an appropriate absorbent. (Sweeping compound, sawdust).
2. Use a broom to work the absorbent into the spill.
3. Gather the combined material and deposit it in a labeled plastic or metal container.
4. Contaminated soil may need to be removed. Soil should be packaged in labeled containers for later disposal. If possible, assess the volume of spilled material, review label and application rates, and then apply as a legal application. Use of the product, though not necessarily for pest control, is legal and allows the material to breakdown under normal application conditions; thus, negating the need to handle the material as an expensive hazardous waste. If application is not possible, dispose of the material as a hazardous or non-hazardous waste depending on the product.

3.6 Animals/Wildlife/Livestock

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

Livestock. We do not have livestock or manure lagoons. We do have chickens and ducks at the bottom of the property. Our production areas are not located near or adjacent to dairy, livestock, or fowl production facilities or manure. Livestock animals are not allowed in or near sources of irrigation water.

Fence and Field inspections. Cultivation areas are monitored for presence and signs of wild and domestic animals entering the production areas. Daily we do a field perimeter check to look for animal tracks and pathways, animal resting areas, or other signs of animals in the fields.

Inspecting the fences and fields can include the following:

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

3.7 Cultural Resources

If buried archaeological or historical resources are encountered during construction or cultivation activities, ENF personnel or contractor shall temporarily halt all work in the

immediate area and contact a qualified archaeologist to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, ground stone artifacts, dietary bone, and human burials. If human burial is found, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

3.8 Light Pollution

All outdoor lighting used for security purposes is shielded and downward facing. ENF personnel ensure that lights used for cultivation are shielded from 30 minutes before sunset to 30 minutes after sunrise to avoid nighttime glare. Juvenile plants within greenhouses may be under lights overnight for the purpose of increasing plant growth. In case lights are used for this purpose, we cover greenhouses with plastic covers that are impenetrable by light and uncover them 30 minutes after sunrise.

Part 4: Cultivation Plan

4.1 Planting and Harvesting

All objects that come into contact with plants must be clean, in good working condition, and cleaned and/or sanitized on a regular basis. This includes, for example, hands, harvesting equipment (knives, pruners, etc.); harvesting tote transportation equipment; bulk hauling vehicles; processing equipment (tables, tubs); and storage equipment.
Planting. Planting begins in April with both seeds and clones. These are located in the Immature Plant Area with a small amount of supplemental light until they are planted. The plants get planted in four-inch pots before going into the permanent beds. Full term outdoor plants are generally planted in late June and harvested in October. The first light deprivation plants are generally planted in beds in the beginning of May and harvested in July, at which time the beds are replanted from nursery stock for the second run. Additionally, after harvest of the second run a third run may be utilized depending on water, weather and market conditions.

Immature plants are grouped in batches by strain and planting date per METRC protocol. Upon transferring plants into designated growing areas, Eagles Nest can record plant UID information with their respective growing area on the **Planting Events log sheet** (see Appendix F). The data collected throughout the season can be used to analyze yield and improve on future production.

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

Harvesting. The harvest process is done in stages by clipping two- or three-foot-long sections of the mature plant and finishing with the removal of the remains of plant material from the bed or pot. Small batches are then transported inside totes. The totes are labeled according to current METRC regulations. Cannabis is harvested over several consecutive days, depending on the size of the area ready for harvest. Harvest information can be recorded on the **Harvest events log** and required data is entered into METRC according to regulations.

Harvest tools policy. The tools we use for harvesting consists of both hand pruners and smaller scissors. Any tool used for harvesting produce, such as a shears or scissors, will be cleaned and/or disinfected daily. If a tool is not clean, that tool should not be used for harvesting. For sterilization we will use a cleaning basin and non-toxic cleaners. Cleaning history can be kept on file in the **Harvest Tool and Container Cleaning Log (Appendix F)**.

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

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

4.2 Rodent, Pest, and Fungus Control (Pest Management)

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

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

All walls, doors, and windows in buildings are inspected. All windows are screened. Any holes are repaired to prevent pest and/or bird entrance into the buildings.

Pests.
Indicators: spotted or curled leaves, webs, fungus gnats or white flies.
All pesticides and fungicides are OMRI approved products.

We strongly believe that preventative measures are the best policy. Bi-weekly application of organic pesticide during the vegetative cycle can help reduce the chance of infestation. Pesticide is never applied to flowering plants, when pollinators are present, or when high winds are present. Our practices ensure that pesticide does not reach surface or groundwater at any time.

If used, ENF personnel can record pesticide application in the **Pest Management log.** Refer to Table 4.2 below for type of pesticides used and amount applied annually. Pesticide products along with the MSDS documents are safely stored in the Pump House. Spills or leaks are cleaned up immediately (refer to section 3.5 Hazardous Materials for clean-up protocol). Our OIN #: 1200472.

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

Fungus Control.
Indicators: white powdery mildew, root rot, stem rot
Preventative measures are the best policy. Bi-weekly application of Dr. Zymes fungicide reduces the chance of infestation.

Any uses of fungicide products shall be in compliance with the State laws and regulations enforced by the County Agricultural Commissioner's Office. The following table represents current farm practices and products. If additional or different products are identified and used in the future they will be limited to products and applications that are approved and compliant with applicable laws and regulations.

TABLE 1. Pesticides and Fungicides			
Type/Brand	**Quantity Used Annually (gallons/year)**	**Frequency/Rate of Application (Depends on growth stage)**	**Active Ingredient**
Dr. Zymes Eliminator	10	Bi-weekly	Citric acid

4.3 Waste Management

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

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

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

Cannabis waste will be identified, weighed, and tracked in the METRC system per section 7.2 of this document. ENF personnel will maintain accurate and comprehensive records regarding cannabis waste that account for, reconcile, and evidence all activity related to the generation or disposition of cannabis waste. Cannabis waste records will be stored in the ENF records binder located in the **Records and Administrative Hold Area.**

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

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

Part 5. Curing, Processing and Packaging

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

5.1 Curing Process

During the initial harvest, any mold is completely removed and disposed of in a compost pile. Plants are hung in strain specific batches on wire basket racks in the Curing Shed. The Drying and Curing Shed will be dismantled and replaced, if feasible at a future date. The new facility will occupy the substantially same footprint with no new ground disturbance being proposed. The traceability tags are hung with the batches to prevent disruption to the traceability protocols. The curing house is kept at 72°F and 60% humidity until the flowers are properly cured. Cured batches are sealed in cleaned and labeled storage totes and stored in the locking Curing Shed.

5.2 Processing, Packaging & Labeling

Processing and packaging will occur at the Curing Shed or off site at a licensed processing facility. The Curing Shed will be permitted to commercial standards by the closing of the compliance agreement or processing will be permanently moved off site. Separate strains and plants will maintain traceability by batch processing and segregated staging in sealed totes.

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

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

Packaging and Labeling Cannabis. All finished cannabis and non-manufactured cannabis products will comply with State and County track and trace packaging and labeling requirements and regulations. Trim material is also labeled and stored to the same standard. The finished flowers are either transferred to a manufacturer or distributor for packaging and labeling or if packaged and labeled on site, the following

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

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

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

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

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

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

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

Part 6. Storage and Transportation

6.1 Cannabis Storage

The packaged product will be stored in a locked container in strain specific batches that maintain traceability. Items can be checked in and out of the container with the **Cannabis Release Log (Appendix F)** and logged/transferred in METRC per requirements and regulations.

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

6.2 Transportation of Cannabis

All delivery trucks and vehicles used to transport cannabis from ENF to another licensee (for testing, or distribution) are inspected for odors and signs of unsanitary conditions before loading. If a vehicle is found to be unsanitary, it will be cleaned and sanitized before cannabis is loaded. All records of inspections and cleaning can be kept on the **Delivery Vehicle Cleaning and Inspection Log.**

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

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

Part 7: Traceability, Records and Sales

7.1 Traceability General Procedures

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

Account/Cultivation Manager & Training. ENF has a designated track and trace account manager (Cultivation Manager) who has completed the track and trace system training (see Appendix F Employee Training Log). The account manager legally represents ENF. The account manager can designate additional users of METRC. Any additional ENF personnel that are designated to use these systems will also complete the corresponding system training.

ENF account manager monitors all notifications from the track-and-trace system and resolves all issues included in the notification in the timeframe specified in the notification. ENF account manager ensures that the issue(s) identified in the notification is/are fully resolved before dismissing the notification.

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

Track and Trace Unique Identifiers (UID) / METRC Tags. State issued UID's must be provisioned by the DCC. ENF track and trace account manager requests UIDs using the track and trace system. Maintain sufficient supply of UID's and enter receipt of UIDs in the track and trace system/METRC within three (3) business days of physical receipt of UID's. The UID shall accompany cannabis products through all phases of the growing cycle.

Pre-Existing Cannabis prior to receiving State license. See Appendix E for important instructions to follow upon issuance of Sate Annual License to deal with pre-existing cannabis plants on the farm. Also, procedures for closing out inventory in the case that license is surrendered, expired, or revoked.

7.2 Field Traceability

1) Immature Plants

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

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

b. State Reporting Requirement – Immature plant lot UID information is entered into the track and trace system within three (3) days of creation of the UID. If clones or seedlings are physically received or rejected by ENF personnel

from another licensee, this transfer is reported in the track and trace system (refer to section 7.4 for required info to be entered).

2) **Mature Plants**
   a. Sate/METRC Procedure – Upon transferring plants to designated planting areas, each plant is given their own individual METRC label, attached to the main stem at the base of each plant. All labels will be clearly visible and free of dirt and debris. The label/tags remain on the plant until harvested or disposed of.

   b. State Reporting Requirement – Mature plants are reported in the track and trace system upon any change in disposition, including when the plants have flowered, and if plants are destroyed and disposed of (likely due to mold or bugs, rendering the plant unusable).

3) **Harvested Cannabis**
   a. State/METRC Procedure **–** Harvested cannabis plants are batched and assigned a unique harvest batch name which is associated with all the UIDs of each individual plant, or portion contained within the harvest batch.

   b. State Reporting Requirement – Each unique harvest batch name is entered in the track and trace system within three (3) days of harvest.

4) **Cured and processed cannabis**
   a. State/METRC Procedure **–** finished cannabis and non-manufactured cannabis products are labeled with UID's associated with the corresponding harvest batch name that they are derived from.

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

5) **Cannabis waste**
   a. METRC Procedure – Upon destruction or disposal of any cannabis or non-manufactured cannabis products, the applicable UIDs shall be retired in the track-and-trace system by the licensee within three (3) business days of the destruction or disposal and be performed in accordance with the licensee's approved cannabis waste management plan.
   Reporting Requirement – In addition to retiring UID's for disposed cannabis (due to plant damage), Cannabis compost weight is to be reported in track and trace. Refer to section 4.3 for cannabis compost recording procedures.

7.3 Commercial Traceability

Each transfer of Cannabis or non-manufactured cannabis product between licensed entities is recorded and entered into METRC.

STATE:
Cannabis transferred FROM ENF – All transfers of cannabis or non-manufactured cannabis products from ENF to another licensed entity is entered in METRC prior to the movement of the cannabis or non-manufactured cannabis product off the premises. **Refer to section 7.4 Sales Invoices and Receipt Requirements** for required information to be recorded and entered into METRC.

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

7.4 Sales invoices and receipt requirements

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

** Required info to enter in Track and Trace system/METRC

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

11) Signature of the seller, or designated representative of the seller, acknowledging accuracy of the cannabis and non-manufactured cannabis products being shipped.
12) Signature of the purchaser, or designated representative of the purchaser, acknowledging receipt or rejection of the cannabis or non-manufactured cannabis products.

7.5 Weighing

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

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

7.6 Record Retention

ENF personnel will keep and maintain the following records for at least seven (7) years from the date the document was created. Records will be securely stored in The Eagles Nest: Records and Administrative Hold Area. and are available for review by the DCC upon request, or during regular business hours (8:00am – 5:00 pm PST). *All legally required record keeping shall be maintained for the legally required duration.*

Part 8: Security

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

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

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

All harvested and finished Cannabis is stored in a locking container and each item can be checked in and out of the container by recording it on the **Cannabis Release Log (see Appendix F)**.

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

Part 9: Personnel

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

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

We will visibly post and maintain an emergency contact list in the The Eagles Nest:

EMERGENCY RESPONSE CONTACT:

Operation manager contacts: Laura Berry, 707-223-1506

Life Threatening / Other Emergency – 9-1-1

Fire Department – 9-1-1

Garberville Fire Station – 707-923-2645

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

Poison Control – 800-222-1222

Southern Humboldt Community Clinic – 707-923-3925

Frank R Howard Memorial Hospital– 707-459-6801

9.1 Personnel Training

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

Safety training relevant to specific job functions may include:
1) Emergency action response planning as necessary;
2) Employee accident reporting and investigation policies;
3) Fire prevention and water locations;
4) Hazard communication policies, including maintenance of material safety data sheets

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

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

9.2 Health and Hygiene policy

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

Hand washing and toilet facilities. Clean and well-maintained toilet and hand washing facilities are provided via a portable toilet and hand washing station for guests or employees. All toilet/restroom facilities are properly supplied with single-use towels. These facilities are checked on an ongoing basis. Restroom facilities are serviced and cleaned as needed. Monitoring, restocking, and cleaning can be documented on the Restroom Cleaning Logs and are located in the folder chained to the wall outside the restroom. A copy of the log form can be found in Appendix F.

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

Toilets. Portable toilets will be available within 1/4 mile of each worksite as required.

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

9.3 Injury and Illness Policies

EMERGENCY RESPONSE CONTACT: 911

Injuries. If someone is injured at the farm, either in the packinghouse or in the field, the first aid kits are available for use in The Eagles Nest Office The supplies are checked and updated monthly. History of refilling first aid kits can be kept in the **First Aid Kit log.** The log form can be found in Appendix F.

All workers are instructed during training to deal with injuries immediately. This includes any cuts, abrasions, or other injury that happens while working. Employees must notify the farm manager or their supervisor and fill out an accident report. If the injury is critical or life threatening, employees are instructed to call 911 for proper care.

Blood and body fluid. If blood or other bodily fluid should come in contact with produce or in the field, immediate action must be taken.

If a person is not able to immediately deal with the contamination due to injury, that person must mark the area if able and immediately notify the farm manager or his/her supervisor who will take appropriate action.

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

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

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

1) The following symptoms prohibit an employee from working and handling fresh produce.
    - Diarrhea
    - Fever
    - Vomiting
    - Jaundice
    - Sore throat with fever

- Lesions containing pus (including boils or infected wounds, however small) on the hand, wrist, or any exposed body part

2) If an employee has any of the conditions listed above, these conditions will be recorded on the **Illness and Injury Form.**

Safety during application of preventatives. Only trained individuals may apply regulated substances including plant protective sprays. Any and all uses of pesticides shall be in accordance with the state and local laws.

9.4 Employee Safety and Security Empowerment

All employees are instructed to share information they observe regarding safety and security. If employees see unusual individuals or situations, they should notify their supervisors so they can evaluate the situation. If employees notice pests or other safety issues, they are encouraged to share this information with their supervisors. Our company safety policy includes all employees and is companywide.

Clothing, Jewelry, and Cell Phone Policy. Employees will wear clean clothing to work every day. No jewelry is permitted in the field, around machinery, packinghouse, or packing facility with the exception of a plain wedding band (no stones allowed) and wrist watches.

Cell phones are not allowed unless they are required for farm business. All cell phones will be stored in lockers or kept in a belt holster or pants pocket**.**

9.5 Policy on Taking Breaks

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

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

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

Appendix A *Site Plan (Premises Diagram)*

Appendix B *CULTIVATION SCHEDULE*

[Farm logo Name]

CULTIVATION SCHEDULE

Note: The timing of cultivation activities is dependent on weather and subject to change

Item	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Drainage, Runoff, and Erosion Control	Winterization (storage of pots/greenhouse covers)												
	Temporary Erosion Control (straw, seeding, fiber rolls, etc)												
	Road maintenance												
	Culvert and inboard ditch maintenance/inspection												
	Cultivation waste hauled off site												
	Cover soil beds with cover crop												
Irrigation Activities	Irrigation of juvenile seed starts and clones												
	Irrigation of flowering plants												
Pre-cultivation Activities	Amend soil in greenhouses and outdoor beds												
	Transplant seedlings and clones												
Light Deprivation Cultivation and Harvest	Light Dep (Cycle 1)												
	Light Dep (Cycle 2)												
	Harvest activities												
	Light deprivation: Greenhouses are covered with blackout covers												
Outdoor Cultivation and Harvest	Outdoor Cultivation Cycle												
	Harvest activities												
Drying and Curing	Drying and curing												
Farm Personnel Present	Agent (s) in Charge (Owner)												
	Seasonal Laborers												

APPENDIX C *Water Testing Procedures*

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

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

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

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

Total Coliforms (including fecal coliform and *E. coli)* maximum contaminant level goal (mcgl) 0 $(mg/l)^2$. Coliforms are naturally present in the environment. Fecal coliforms and *E.* coli come from human and animal fecal waste.
Nitrates mclg 10 $(mg/l)^2$. Sources include runoff from fertilizer use, leaking septic tanks, or sewage.
Nitrites mclg 1 $(mg/l)^2$. Sources same as above.

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

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

APPENDIX D *Cannabis Waste Composting Protocol*

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

Cannabis is composted on site in the secure designated cannabis compost area in accord with all legally required cannabis composting protocol.

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

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

1) Within thirty (30) business days of receipt of initial UIDs ordered, the licensee shall enter into the METRC system and assign and apply a UID to each pre-existing immature plant lot, each individual mature plant, and all non-manufactured cannabis products physically located on the licensed premises.

2) After the thirty (30) daytime frame referenced in subsection (a) above expires, all cannabis at the licensed premises shall be entered into the track-and-trace system starting with seed, clone propagated onsite or purchased from a licensed nursery, or seedling purchased from a licensed nursery

Close out of physical inventory instructions

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

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

Close-out of physical inventory includes, but is not limited to, all of the following items:
(1) Immature plants and their corresponding lot UID(s);
(2) Mature plants and their corresponding plant UID(s);
(3) Harvest batches and their corresponding UID(s);
(4) Non-manufactured cannabis products and their corresponding UID(s); and
(5) UIDs in the licensee's possession which have not been assigned in the track-and-trace system.

APPENDIX F *Optional Log Sheets*

Planting Events Log

Harvest Events Log

Harvest Tote/Tool Cleaning Log

Packaging Events Log

Cannabis Release Log

Water source testing log

Pest and rodent control log

Field Sanitation Unit Service Log

Illness and injury report form

First Aid Kit Log

Restroom cleaning log

Planting Events Log

Grow Area	Date	UID	Strain	Quantity	Notes

Harvest Events Log

Grow Area	Date	UID	Strain	Wet Weight	Dry Weight	Notes

Harvest Tote and Tool cleaning log

Tote # / Tool	Date	Cleaning method	Cleaned by

Packaging Events

BATCH UID	NAME/TYPE	WEIGHT/COUNT	DATE/TIME	LOCATION	SIGNATURE

Cannabis Release Log

Batch/UID	Name/Type	Weight/ Count	Date & Time of release	Destination	Signature

Water source testing log

Date	Sample taken by	Sample source	Testing agency	Expected result date

Pest Management log

Grow Area	Date	Pest type	Control measures/ product used	Quantity of product used

Field Sanitation Unit Service Log

Location	Cause	Date	Requires attention (Y/N)	Attention required	Correction performed by

Illness and injury report form

Team member	Date	Nature of illness/injury	Reported to	Method of reporting	Expected time to be missed

First Aid Kit Log

Inspected by	Date	Kit complete (Y/N)	Items needed	Needed items replaced (Y/N)	Replaced by

Restroom cleaning log

Inspected by	Date	Satisfactory (Y/N)	Cleaned by