

ADDENDUM TO CULTIVATION OPERATIONS PLAN NCRV II, LLC PROJECT PLN-11544; APN 530-151-005

PROJECT DESCRIPTION: While applicant has been approved for 29,500 sq. ft. of outdoor cultivation, applicant is only requesting approval of a conditional use permit for 17,360 sq. ft. of outdoor cultivation due to the need to relocate additional existing cultivation outside of Tribal Cultural Areas. Applicant is proposing 1,640 sq. ft. of accessory propagation. Irrigation water for the project will be sourced solely from a 750,000-gallon permitted off-stream rainwater catchment pond. Power to the site is supplied from a generator on site and housed in an existing on site-shed that muffles sound emitted to less than 50 dbs.

WATER SOURCE: Water for irrigation is sourced from a permitted 750,000 gallon off-stream rain catchment pond.

WATER STORAGE: In addition to the 750,000-gallon rainwater catchment pond, applicant has four (4) water tanks with total storage capacity of 2,500 gallons each and six (6) water tanks with total storage capacity of 2,825 gallons each. Total water storage on the premises is 776,950 gallons.

PROJECTED WATER USAGE: Applicant will cultivate approximately 17,360 sq. ft. of outdoor cannabis with an additional 1,640 sq. ft. dedicated to accessory propagation activities. Applicant is anticipating two runs of cultivation using light deprivation techniques. Based on CDFW estimates, and Applicant's practice of watering every fourth day during the growing season, applicant anticipates using approximately 127,302 gallons of water. The applicant's water usage is broken down monthly in the following table:

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Water Usage	0	0	1,760	17,935	17,935	17935	17935	17935	17935	17935	0	0

WASTE DISPOSAL: The site generates little human refuse. Garbage cans for trash and recyclables are stored in a portion of the Conex boxes depicted on the site plan and equipped with lids for secondary containment. Human waste will be addressed with an ADA accessible portable toilet installed on-site in the location shown on the site plan. There are also two existing composting toilets on-site, however they will not be utilized in the operation.

CULTIVATION OPERATIONS: All activities associated with commercial cannabis have been or will be removed from the surrounding area labeled "Bee Lake Archaeological Site" and have been or will be relocated to the detailed-on sheet 2 of the site plan.

Applicant will be cultivating 17,360 sq. ft. of outdoor cannabis with 1,640 sq. ft. of accessory propagation. Applicant is proposing to conduct two runs using light

deprivation techniques. Power needs are served by a generator housed in existing Conex boxes to muffle noise disturbance to less than 50 dbs.

Two employees will be used in the cannabis operation and sufficient parking will be available on site. Applicant is anticipating two daily car trips to and from the site as employees will carpool together to and from the site. Hours of operation will be 8:00 AM and 6:00 PM. No on-site housing will be provided.

PROCESSING: No processing activities will take place on site. Harvested cannabis may be hung dry on site in Conex boxes and transported off-site to be trimmed.



NCR VII, LLC

CULTIVATION, OPERATIONS, AND SECURITY PLAN

OPERATIONS PLAN

1. Description of Water Source, Storage, Irrigation Plan, and Projected Water Usage

<u>WATER SOURCE AND STORAGE</u>: The primary source of irrigation water comes from a self-contained spring and water is stored in seven (7) storage tanks, each with a 2,825-gallon capacity. The total storage capacity is 19,775 gallons.

IRRIGATION PLAN: Irrigation water is applied at agronomic rates to minimize over watering cannabis plants and reducing the risk of irrigation runoff. Irrigation is applied through a traditional drip irrigation system that has safety valves in case of leaks. Applicant will be watering every four days during the growing season. Applicant waters in the morning/early evening hours to reduce evaporative loss. Applicant uses straw top mulch. Applicant maintains vegetation around surface waters and within the riparian zone and cultivation areas to minimize transfer of materials to surface water. Ground cover, weed barrier is used to minimize weed growth, which reduces water loss during watering. Applicant uses natural soil amendments to aid in soil moisture retention as part of the irrigation plan. Applicant proposes to also use straw waddles and silt fences.

PROJECTED WATER USAGE: Applicant will cultivate approximately 29,500 sq. ft. of outdoor cannabis with approximately 1,600 sq. ft. of accessory nursery space. Based on California Department of Fish and Wildlife's (CDFW) estimates of cannabis irrigation, and Applicant's irrigation practice of watering every fourth day, Applicant anticipates using approximately 96,022 gallons of water for irrigation for outdoor cultivation during the growing season ((93 days/4) x 29,500 sq. ft. x (1.4/10 sq. ft.)).

The above figures are weather dependent and are only estimated water usage totals. Applicant will install flow meters at all critical points to measure actual yearly water usage upon implementation of the project.

2. Description of Site Drainage, including Runoff and Erosion Control Measures

<u>SITE DRAINAGE</u>: There are two streams on the property but no road crossings of the streams and no culvert or drainage structures on the road. There is one 30" culvert. There are at least 100-feet between all cultivation areas, storage areas, compost areas, or other graded or developed

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areas on the property. There are at least 100-feet between all cultivation areas, storage areas, compost areas, or other graded or developed areas and ay streams or other surface waters on the property.

<u>EROSION CONTROL MEASURES</u>: Roads on the property are rocked and have straw and water bars which promote infiltration/dispersal of outflows and prevent erosion. Applicant plans to fill pot holes on all roads. Applicant will consult with, and implement recommendations by, Sweet River Sciences to implement best management practices to prevent erosion from occurring around roads and developed areas.

RUNOFF CONTROL MEASURES: There is no runoff from Applicant's cultivation activities. Applicant uses drip irrigation, waters at agronomic rates, uses timers to avoid overwatering and maintains vegetation around cultivation areas and riparian areas to minimize runoff and sediment transportation to receiving waters. Applicant's outdoor cultivation areas produce no concentrated storm water runoff from the cultivation areas. Applicant will re-seed and re vegetate any exposed soils around the cultivation areas and install straw bales and sediment control fencing on slopes or discharge points that may transport sediment to receiving waters. Applicant will consult with, and implement recommendations from, Sweet River Sciences to improve runoff control measures on an as needed basis.

3. Details of Measures Taken to Ensure Protection of Watershed and Nearby Habitat

PROTECTION OF WATERSHED AND HABITAT: Cultivation areas are all setback at least 100-feet from the nearest watercourse. Buffers are maintained at natural slope with native vegetation to prevent sediment transport to receiving waters. These buffers are unaltered and appear to be of sufficient width to filter wastes from runoff and to maintain essential functions of riparian areas. Riparian areas are protected in a manner that maintains their essential functions.

<u>CULTIVATION RELATED WASTE PROTOCOLS</u>: Applicant is implementing measures to reduce and/or eliminate cultivation related waste. Pots containing starts and clones will be washed, rinsed, and reused between seasons and recycled at the end of their useful life. Applicant will recycle pesticide and fertilizer containers per California pesticide regulations. All other associated waste will be placed in garbage cans with lids and placed within the structure to the south of the cultivation areas (20'x40' existing processing facility as shown on the site plan) to prevent nutrients from being leached to groundwater or transported to watercourses. In addition, Applicant will reuse grow bags, recycle soil bags, and use soil for multiple cultivation cycles. Applicant will determine frequency of disposal to permitted disposal sites that prevents rodent infestation and other nuisances on the property. This will likely be done on a bi-weekly schedule during the growing season.

<u>REFUSE DISPOSAL</u>: The site generates little human refuse. However, Applicant has garbage cans for garbage and recyclables that are stored in a shed and equipped with lids in secondary containment to prevent leaching and transport of foreign materials to receiving waters. Applicant

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will determine the frequency of pickup and delivery to disposal facilities that prevents rodent infestation and other nuisances on the property. This will likely be done on a bi-weekly schedule during the growing season.

<u>HUMAN WASTE</u>: There is no domestic sewage system or residence on the property. However, Applicant has a compost toilet facility.

4. Protocols for Proper Storage and Use of Fertilizers, Pesticides, and Other Regulated Products

PESTICIDES: Applicant does not use any pesticides.

If Applicant should use pesticides, they will be stored in the existing shed that is completely enclosed, lockable, and equipped with a non-permeable floor liner to prevent leaching of pesticides into groundwater or transport to surface waters. Pesticides will be kept in original containers with labels affixed and kept in secondary containment totes to further minimize spills from transportation to groundwater or receiving surface waters. Approved spill proof containers with appropriate warning and information labels will be used to transport pesticides to and from site. In addition, Applicant uses buckets with sealed lids as storage containers for the disposal off concentrated nutrients, petroleum products, or other hazardous materials. Applicant will train employees to follow appropriate application rates of fertilizers.

Applicant will maintain and keep personal protective equipment required by the pesticide label in good working order. Coveralls will be washed after use when required.

All required warning signs will be posted and material safety data sheets (MSDS) will be kept in the area where pesticides are stored. Emergency contact information in the event of pesticide poisoning shall also be posted at the work site including the name, address and telephone number of emergency medical care facilities. Change areas and decontamination rooms will be available off-site.

Before making a pesticide application, operators will evaluate equipment, weather conditions, and the property to be treated and surrounding areas to determine the likelihood of substantial drift or harm to non-target crops, contamination, or the creation of a health hazard.

FERTILIZERS: Applicant only uses Dr. Earth Premium Gold All-Purposes Fertilizer and is stored in the on-site building referenced above.

Should Applicant use other fertilizers, he will seek out and use fertilizers that are OMRI certified, advertised as naturally based, and from Humboldt County. Fertilizers will be stored in the on-site building referenced above that is completely enclosed, lockable, and equipped with a non-permeable floor liner to prevent leaching and transport to surface waters. Applicant will store and use fertilizers according to the protocols it uses for pesticide storage and use. Fertilizers will

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be kept in secondary containment totes to further prevent leaching. Applicant will use all fertilizers according to the label and use personal protective equipment as required by the label. Applicant will train employees to follow appropriate application rates of fertilizers.

Before making a fertilizer application, operators will evaluate equipment, weather conditions, and the property to be treated and surrounding areas to determine the likelihood of substantial drift or harm to non-target crops, contamination, or the creation of a health hazard.

SOIL AMENDMENTS: Applicant does not use soil amendments.

Should Applicant use soil amendments, they will be stored in the on-site building referenced above.

Before making a soil amendment application, operators will evaluate equipment, weather conditions, and the property to be treated and surrounding areas to determine the likelihood of substantial drift or harm to non-target crops, contamination, or the creation of a health hazard.

<u>PETROLEUM PRODUCTS AND STORAGE</u>: Applicant stores gasoline in an external truck tank and gas car oil in sealed 5-gallon buckets that are recycled weekly. Propane is stored in five (5), ten (10), or twenty (20) gallon tanks. Generators are equipped with secondary containment and spill-prevention kits are on-site. Applicant will muffle generator noise to less than 50 dbs. to prevent disturbance of surrounding habitat. Combustible materials shall be stored separately from petroleum products.

5. Description of Cultivation Activities (e.g. outdoor, indoor, mixed light)

<u>CULTIVATION ACTIVITIES</u>: Applicant is proposing to permit existing full-term outdoor cultivation site with cultivation area of 29,500 sq. ft. with 1,600 sq. ft. of accessory nursery space. Applicant will be using surface water to irrigate cannabis. Applicant will be cultivating in raised beds to prevent excess irrigation runoff and promote soil moisture retention. Cover crops will be planted at the end of the year to promote soil regeneration.

Power is supplied via a generator. Generator is housed inside the shed on-site. The generator is equipped with secondary containment to prevent seepage of fuels to groundwater or surface water. Applicant will sufficiently muffle sound from generators to less than 50 dbs. to protect surrounding habitat.

Applicant anticipates hiring two employees for cultivation. Applicant does not anticipate increased road activity. Employees carpool to and from the site. Peak road usage will be between 8:00 AM to 9:00 AM and 5:00 PM to 6:00 PM. Parking will be provided near the cultivation site and there will be no on-site housing. Two composting toilets are available for use on-site. Applicant proposes to install a septic system on the property. On-site bathroom facilities will be located at least 100-feet from areas where individuals work.

Applicant will comply with all applicable federal, state, and local laws and regulations governing California agricultural employers. Applicant will execute a statement declaring it is an agricultural employer as defined in the California Labor Code.

Applicant will follow all performance standards outlined in Humboldt County's Commercial Medical Marijuana Land Use Ordinance ("CMMLUO") with respect to cultivation activities, including developing employee safety protocols which include: 1) an emergency action response plan and spill prevention protocols; 2) employee accident reporting and investigation policies; 3) fire prevention policies; 4) maintenance of Material Safety Data Sheets (MSDS); 5) materials handling policies; 6) job hazard analyses; and 7) personal protective equipment policies. Applicant will ensure that all safety equipment is in good and operable condition, and provide employees with training on the proper use of safety equipment.

Applicant will post and maintain an emergency contact list which includes: 1) operation manager contacts; 2) emergency responder contacts; and 3) poison control contacts. All cultivation activities will be charted and calendared and visibly posted in the cultivation facilities.

6. Schedule of Activities During Each Month of the Growing and Harvesting Season

January-April

No Activity

May

- Water greenhouses every fourth day
- Planting
- Approximate generator use- 180 hours

June

- Water greenhouses every fourth day
- Continue planting
- Begin pulling tarps for light deprivation
- Approximate generator use- 0 hours

July

- Water greenhouses
- Pull tarps for light deprivation
- Begin de-leafing plants
- Approximate generator use- 0 hours

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August

- Water greenhouses every fourth day
- Pull tarps for light deprivation
- De-leaf plants
- Begin harvesting
- Begin re-planting
- Trim and manicure harvested plants
- Approximate generator use- 0 hours

September

- Pull tarps for light deprivation
- De-leaf plants
- Continue harvesting
- Trim and manicure harvested plants
- Approximate generator use- 0 hours

October

- De-leaf plants
- Begin harvesting second cycle
- Trim and manicure harvested plants
- Approximate generator use- 0 hours

November

- Trim and manicure harvested plants
- End of year reporting
- Clean and landscape areas used in cultivation
- Approximate generator use- 0 hours

December

- End of year reporting
- Approximate generator use- 0 hours

PROCESSING PLAN AND ACTIVITIES

<u>PLAN</u>: Processing will occur in the 20' x 30' processing facility as labeled on the site plan. The processing facility will be sanitized after every use using organic cleaning products to prevent mold growth and other contaminants. A daily cleaning routine for all work rooms and surface areas will be prepared and carried out by employees. Employees will be required to wash their hands prior to handling the product and after using the restroom. Sanitary equipment and products such as hand sanitizing liquids, paper towels, gloves, water and face masks will be

provided on-site and kept in good and operable condition. Emergency contact numbers will be posted in working areas, including local poison control center.

Hand sanitizing liquid, gloves, potable water, and face masks shall be provided to employees. Potable water will be supplied from groundwater source located on the property and stored in a 550-gallon water tank.

Applicant will implement the following safety practices as a part of the processing plan: 1) functioning safety equipment, including masks, gloves, and respiratory equipment will be provided to employees in good and operable condition; 2) sanitized protective overcoats will be provided to prevent cross contamination and skin irritation; 3) poison control and emergency services contacts will be posted in processing areas; 4) safety signage will be posted and spillage prevention policies will be developed; 5) safety training on proper use of trimming equipment; and 6) development and implementation of a workplace health and safety survey.

PROCESSING ACTIVITIES: During harvest months, the climate is warm and dry. Therefore, harvested plants can be air-dried. Humidity and temperature will be monitored to ensure proper conditions for curing. Cut flowers will be de-leafed and inspected for mold and then brought to the dry room. Flowers will remain on stalk and hung on screen racks for approximately 4-7 days. The dry room is thermostatically controlled to regulate temperature and humidity levels.

The Applicant will use a moisture meter to determine dryness. If the moisture content is below 15%, mold development is prevented. Upon reaching sufficiently safe moisture content, flowers will be bucked, placed into sealed plastic bins, and moved into the curing room. The cure room is also thermostatically controlled to regulate temperature and humidity and to ensure an even, slow cure. Bins will be regularly opened and closed to enhance flavor and aroma and to ensure a fully dried product for packaging and storage in the cultivation facility.

Flowers will then be bagged, barreled, and moved to storage rooms where they will remain until ready to be trimmed. Flowers will be hand-trimmed and finished. They will be separated and vacuum-packaged in one-pound increments, bagged, sealed, and moved back into storage for transport. Trim will be gathered for secondary manufacturing markets.

SECURITY FEATURES

Applicant has implemented security measures to safeguard the product and prevent nuisance from occurring on the property. There are gates and locks on all access roads to the property and "private property" and "no trespassing" signs are posted. There is an 8-ft. game fence around the grow area. All doors and windows on all buildings are lockable. All finished marijuana is stored away from processing activities and in a locked facility. Applicant has 6 security cameras near roads and around the dry rooms and grow areas. Applicant also has a German Shepard named Bear who aids in security.

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To ensure the non-diversion of product, Applicant will enroll in a track and trace program upon the implementation of those programs at the state and local level. Applicant will comply with SB 420 and the Attorney General Guidelines for the Security and Non-Diversion of Medical Cannabis (2007).