

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT**

Resolution Number 24-093

Record Number: PLN-2024-19054

Assessor's Parcel Numbers: 524-091-009 and 524-101-025

Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and conditionally approving the Organic Liberty CA LLC Conditional Use Permit Modification, Special Permit, and Zoning Clearance Certificates.

WHEREAS, the Humboldt County Planning Commission held a duly-noticed public hearing on July 23, 2020, and approved on consent a Conditional Use Permit (PLN-12376-CUP) for a new 3.3 acre full-sun outdoor cannabis cultivation operation; and

WHEREAS, **Organic Liberty CA, LLC** applied for a Conditional Use Permit Modification to expand the existing cannabis operation from 3.3 acres to 4 acres and allow mixed-light and light deprivation cannabis cultivation, and to add a Special Permit for non-flammable cannabis manufacturing, and Zoning Clearance Certificates for a commercial cannabis nursery, cannabis processing, and cannabis distribution; and

WHEREAS, a Mitigated Negative Declaration was adopted for the original approved project (PLN-12376-CUP), and a Subsequent Negative Declaration has been prepared for the proposed Conditional Use Permit Modification, Special Permit, and Zoning Clearance Certificates and circulated for public review pursuant to Section 15074 of the CEQA Guidelines; and

WHEREAS, the Humboldt County Planning Commission held a duly-noticed public hearing on December 19, 2024, and reviewed, considered, and discussed the application for the requested Conditional Use Permit Modification, Special Permit, and Zoning Clearance Certificates, and reviewed and considered all evidence and testimony presented at the hearing.

Now, THEREFORE BE IT RESOLVED, that the Planning Commission makes all the following findings:

- 1. FINDING:** **Project Description:** Organic Liberty CA, LLC operates a permitted outdoor cannabis cultivation operation located near the junction of Friday Ridge Road and California State Route 299, south/southeast of the community of Willow Creek. The existing project approval (PLN-12376-CUP) consists of four Conditional Use Permits (CUP16-656, CUP17-042, CUP17-043, and CUP17-044) that allow for ±3.3 acres (143,748 square feet) of outdoor full-sun cannabis cultivation. Organic Liberty CA, LLC proposes a modification to the approved permits to adjust the cultivation boundary and expand the cultivation

area by ± 0.7 acres (± 4 acres total). As a result of the Project, cultivation at the facility would now comprise ± 2.4 acres of outdoor full-sun cultivation in raised beds, ± 0.7 acres (31,500 square feet) of outdoor light deprivation cultivation in hoop houses, and ± 0.9 acres (37,900 square feet) of mixed-light cultivation in greenhouses. In addition, Organic Liberty CA, LLC requests Zoning Clearance Certificates for commercial cannabis nursery, cannabis processing, and cannabis distribution, and a Special Permit for non-flammable cannabis manufacturing, all within new steel buildings ($\pm 11,700$ square feet). Water is sourced from three wells and 12 5,000-gallon rain catchment tanks. 2,264,664 gallons of water will be required each year for irrigation.

EVIDENCE: a) Project Files: PLN-12376-CUP and PLN-2024-19054

2. **FINDING:** **CEQA:** As required by the California Environmental Quality Act, the project was found subject to CEQA. An Initial Study was prepared that found that the Project could not have a significant effect on the environment and a Negative Declaration was prepared by the Planning and Building Department, Planning Division (Attachment 2).

EVIDENCE: a) The CEQA document includes an analysis of the proposed Project. The Initial Study and Draft Negative Declaration (IS/ND) was circulated from October 15, 2024, to November 13, 2024.

3. **FINDING:** **CEQA Public Comments:** There was one specific comment/recommendation from the California Department of Cannabis Control on the IS/ND (see below and Attachment 8).

"The IS/ND would be more informative if it provided a Source List for the references. For referenced documents, the author, title, and date of each document could be provided. For personal communications, the agency or organization, person contacted, date of contact, and method of contact should be provided. For websites, the URL and date visited should be provided."

EVIDENCE: a) This comment has been considered and does not change the conclusions of the IS/ND.

FINDINGS FOR CONDITIONAL USE PERMIT MODIFICATION, SPECIAL PERMIT, AND ZONING CLEARANCE CERTIFICATES

4. FINDING: The proposed development is in conformance with the County General Plan, Open Space Plan, and the Open Space Action Program.

EVIDENCE: a) General and intensive agriculture are use types principally permitted in the Residential Agriculture (RA) land use designation in which the site is located. The proposed cannabis cultivation and support facilities are within land planned and zoned for agricultural purposes, consistent with the use of Open Space land for managed production of resources. The use of an agricultural parcel for commercial agriculture activities is consistent with the Open Space Plan and Open Space Action Program. Therefore, the project is consistent with and complimentary to the Open Space Plan and its Open Space Action Program.

b) As depicted on the Site Plan, there are two naturally occurring seasonal drainages that occur just east of the Project site. All cultivation activities and respective infrastructure would be located outside of the required Streamside Management Area (SMA) buffers of these drainages.

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

The Project site is currently enrolled (WDID:1_12CC428884) in the State Water Resources Control Board (SWRCB) General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (Order WQ 2019-0001-DWQ).

A licensed engineer was retained to prepare a Preliminary Hydrology Report (Attachment 2 – Appendix D) to assess of existing and

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

- c) The Initial Study/Mitigated Negative Declaration prepared for the original approved project (2020 MND) (Attachment 6) found that the existing outdoor cannabis operation would have a less than significant impact to candidate, sensitive, or special status species, sensitive natural communities, riparian habitats, federally protected wetlands, and migratory wildlife corridors with the implementation of site-specific mitigation measures. The Project is proposed within the existing permitted project boundary. The site is a fenced active cannabis operation with areas of proposed modification or expanded uses being largely disturbed. The Project will continue to observe a 50-foot setback from the top of bank or edge of riparian dripline (whichever is greater) of mapped ephemeral watercourses, consistent with the requirements of WQ 2019-0001-DWQ and the County's Streamside Management Areas and Wetland Ordinance. Further, The Project will also adhere to the water quality requirements of WQ 2019-0001-DWQ and the County's Ordinance 2.0 performance standards. This includes requiring that fertilizers and pesticides/herbicides be applied consistent with product labeling and managed to ensure that they will not enter or be released into surface or groundwater. More specifically, all fertilizers and pesticides will be applied at agronomic rates and stored within covered storage container so as to prevent their transport into surface waters. In addition, soils will be stored within designated soil storage areas designed with either concrete or wooden containment features.

The Project proposes to realign 280 linear feet of existing fencing and construct 128 linear feet of new perimeter fencing around a currently unfenced portion of the existing permitted project boundary. These fences and all Project elements will continue to observe a 50-foot setback from the top of bank or edge of riparian dripline and would not interfere with general movement corridors on the vast majority of the Project parcels which are located outside the Project area (e.g., the Project area occurs on ~1% of the larger 400-acre parcel).

In order to determine whether the proposed project could potentially result in new or different impacts than what was analyzed in the 2020 MND, an updated Biological Resources Evaluation (Attachment 2 – Appendix J) was prepared by a qualified biologist (Stringer; July 2024). The updated Biological Resources Evaluation concludes the following:

- **Special-Status Plant Species:** The project area generally lacks suitable habitat for special-status plants due to the existing level of disturbance. No special-status plant species were observed in the project area during focused botanical surveys conducted by SHN (SHN 2020) or during the biological reconnaissance survey conducted in support of the updated report, which included a complete inventory of vascular plants that were evident and identifiable at the time of the survey. Based on the site conditions, combined with the lack of any detections of special-status plants during numerous biological surveys, it was concluded that no special-status plant species are present in the project area and no impacts to special-status plants are anticipated as a result of the proposed project.
- **Special-Status Animal Species:** No special-status animal species were observed in the project area during multiple biological surveys conducted by SHN in 2017 and 2020 (SHN 2020). Additionally, no special-status animal species were observed in the project area during the biological reconnaissance survey conducted in support of the updated report. Due to the existing habitats and level of disturbance, the project area does not provide habitat for the majority of the regionally-occurring special-status species. The following special-status animal species were identified as having the potential to occur in the project area: white-headed woodpecker, red-breasted sapsucker, hoary bat, silver-haired bat, long-eared myotis, Yuma myotis, and fringed myotis. None of these species have any federal or state listing status but are tracked by the California Natural Diversity Database. In addition, the project area provides nesting habitat for a variety of migratory birds and other native birds. The updated biological resources evaluation found that impacts to animal species with the potential to occur are adequately mitigated through continued adherence to the existing conditions of approval pertinent to the protection of

biological resources, including pre-operation bird surveys and special-status animal surveys.

- Impacts to the Oregon white oak woodland habitat in the project area should be avoided. Consistent with the existing project approvals, the proposed project has been designed to avoid impacts to white oak woodland areas, as no white oak trees will be removed.

Potential impacts to candidate, sensitive, or special status species, sensitive natural communities, riparian habitats, federally protected wetlands, and migratory wildlife corridors would be less than significant with continued implementation of the biological resource mitigation measures adopted in connection with the 2020 MND and Mitigation Monitoring Report.

- d) In 2018, a Cultural Resources Investigation was prepared for the Existing Operation by Archaeological Research and Supply Company (updated April 2020). The investigation included a records search through the California Historical Resources Information System's regional Northwest Center (NWIC), Native American Heritage Commission (NAHC) inquiry, coordination with local tribes, and pedestrian survey of the site. In addition, Bob Benson of the Tsunungwe tribe conducted a field visit with Archaeological Research and Supply Company in May 2018.

No historic or prehistoric resources were identified during the investigation. There is one ethnographic village site (Tsunungwe village site) that is eligible for the California Registry of Historic Places on the adjacent parcel to the south of the current Project area, however; no artifacts or associated cultural resources were identified as a result of the investigation. The site has been subjected to past activities that may have disturbed evidence of prehistoric use.

The cultural resources study concluded that the site development will not impact significant historic or prehistoric archaeological resources as a result of ground disturbances if a heightened inadvertent discovery protocol is implemented, which is a current condition of approval. This conclusion is still applicable as the Project and all of its elements are proposed within the existing approved permit boundary.

5. FINDING: The proposed development is consistent with the purposes of the Agriculture General (AG) and Special Combining Zone (B) zoning designations in which the site is located.

- EVIDENCE:**
- a) The AG zone is intended to be applied in areas in which agriculture is the desirable predominant use and rural residential uses are secondary. General agriculture is a principally permitted use in this zoning district. The B zone is intended to be combined with any principal zone in which sound and orderly planning indicate that lot area and yard requirements should be modified. In this case, the B Zone requires a 5-acre minimum parcel size. The subject parcel is approximately 400 acres.
 - b) Section 314-55.4.6.1.1.2(c) of Humboldt County Code (HCC) allows on parcels 320 acres or larger in size, up to one acre of cultivation area per 100-acre increment subject to approval of a Conditional Use Permit provided that the site is accessed off a Category 4 Road. The subject parcel is approximately 400 acres in size and is accessed off Friday Ridge Road, a Category 4 Road.
 - c) Section 314-55.4.8.2.2(c) of HCC allows manufacturing activities involving non-flammable extraction in the AG zone with approval of a Special Permit provided that the site is accessed off a Category 4 Road. The site is accessed off Friday Ridge Road.
 - d) Section 314-55.4.7.1 of HCC allows cannabis distribution, commercial processing, and commercial nurseries in the AG zone with a Zoning Clearance Certificate provided that the site is accessed off a Category 4 Road. The site is accessed off Friday Ridge Road.
 - e) All existing and proposed development meets the minimum yard setback requirements for the AG zone.

6. FINDING: The proposed development is consistent with the requirements of the CCLUO Provisions of the Zoning Ordinance.

- EVIDENCE:**
- a) The CCLUO allows cannabis activities to be permitted in areas zoned AG as described in Section 5 above.
 - b) The subject parcel is a separate legal parcel per Notice of Lot Line Adjustment and Certificate of Subdivision Compliance, Recorded February 3, 2021, Doc. #2021-002549.

- c) Renewable power will be provided by Redwood Coast Energy Authority or a suitable equivalent source with emergency generators as back-up only.
- d) Irrigation water is sourced from non-diversionary wells on site.
- e) Cultivation will occur on slopes of 15% or less.
- f) The cultivation of cannabis will not result in conversion of timberland.
- g) All new cultivation and proposed development will occur outside of areas classified as having prime agricultural soils.
- h) The location of the new cannabis cultivation and proposed development is more than 300 feet from the nearest off-site residence and more than 270 feet from any undeveloped parcel.
- i) The project site is accessed off a County-maintained Category 4 Road.
- j) All use of supplemental lighting will comply with International Dark-Sky Standards
- k) The applicant has submitted a Noise Impact Study, which describes noise measurements taken at the north, south, and east property lines. The existing average ambient decibel levels at the north, south, and east property lines when measurements were taken were 55.7, 65.5, and 59.9 respectively. The project is conditioned to not to exceed three decibels above the measured ambient noise levels found at each property line for the life of the project.
- l) Soils used for cultivation will be refortified after harvest by means of regenerative farming practices so that it may be used again for future cultivation, and the cycle repeated as many times as feasible to minimize the amount of imported soil necessary. In the event that soil cannot be reused, it will be disposed of appropriately as solid waste in compliance with state and local law.
- m) An Invasive Species Control Plan was prepared for the Project. A field survey was conducted, and observations of any invasive species present were recorded. A total of 18 invasive species were identified primarily within the walkways of raised beds. Management and removal recommendations were provided for each of the 18 invasives species identified and included a variety of biological (e.g.

reintroduction of native species) and mechanical (e.g. mowing, tillage, grazing, and hand pulling) control methods. The Project will incorporate the recommendations of the Invasive Species Control Plan.

- 7. FINDING:** The project and the conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare or materially injurious to properties or improvements in the vicinity.

- EVIDENCE:**
- a) The project site is accessed off a County-maintained Category 4 Road.
 - b) The site is in a rural part of the County where the typical parcel size is over 40 acres, and many of the land holdings are very large. The proposed cannabis activities will not be in a location where there is an established neighborhood or other sensitive receptor such as a school, church, park or other use which may be sensitive to cannabis cultivation. Approving the Project on this site will not change the character of the area due to the large parcel sized in the area.
 - c) The location of the new cannabis cultivation and proposed development is more than 300 feet from the nearest off-site residence and more than 270 feet from any undeveloped parcel.
 - d) Irrigation water is sourced from non-diversionary wells on site.
 - e) Provisions have been made in the applicant's proposal to protect water quality through yearly site inspection, monitoring, and reporting to the NCRWQCB. Annual reporting shall be submitted to the NCRWQCB. Therefore, runoff to adjacent property and infiltration of water to groundwater resources will not be adversely affected.

- 8. FINDING:** The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law.

- EVIDENCE:**
- a) The parcel was not included in the 2019 County Housing Inventory and is currently developed with a single-family residence. The proposed Project will not preclude development of an additional residence in the future.

9. FINDING: Approval of this project is consistent with Humboldt County Board of Supervisors Resolution No. 18-43 which established a limit on the number of permits and acres which may be approved in each of the County's Planning Watersheds.

EVIDENCE: a) The project site is in the Lower Trinity Planning Watershed, which under Resolution 18-43 is limited to 169 permits and 58 acres of cultivation. With the approval of this project the total approved permits for cultivation in this Planning Watershed would be 74 and the total approved acres of cultivation would be 38.5.

10. FINDING: The common law Public Trust Doctrine protects sovereign lands, such as tide and submerged lands and the beds of navigable waterways, for the benefit, use and enjoyment of the public. These lands are held in trust by the State of California for the statewide public and for uses that further the purposes of the trust. The hallmark of the Public Trust Doctrine is that trust lands belong to the public and are to be used to promote publicly beneficial uses that connect the public to the water.

EVIDENCE: a) The Project sources water from three permitted wells on the parcel. The wells will be used for combined maximum of approximately 2,264,664 gallons per year. The locations of the wells are at 40.8883 latitude, -123.6087 longitude (Well 1), 40.8902 latitude, -123.6205 longitude (Well 2), and 40.8897 latitude, -123.6201 longitude (Well 3), and approximately 730-, 1,375-, and 1,380-feet elevation above sea level, respectively. Well 1 has a depth of 220 feet, is screened from 40 to 220 feet and yields approximately 5 gallons per minute. Well 2 has a depth of 220 feet, is screened from 120 to 220 feet and yields approximately 15 gallons per minute. Well 3 has a depth of 200 feet, is screened from 80 to 200 feet and yields approximately 20 gallons per minute.

The nearest surface water features to Well 1 are approximately 680 feet to the southeast and approximately 1,400 feet to the east. The watercourse 680 feet to the southeast appears to be an intermittent watercourse based on a review of County GIS and CDFW stream mapping data. This watercourse is located at approximately 90 feet below the elevation of the well head of Well 1. The further watercourse to the east is the Trinity River. The Trinity River is approximately 270 feet below the elevation of the well head of Well 1. The intermittent watercourse to the southeast would therefore be within the screening interval of Well 1 and the Trinity River would be 50 feet in elevation below the screening interval of Well 1.

The nearest surface water features to Well 2 and Well 3 (which are within 200 feet of each other) are approximately 480 feet to the north and approximately 2,000 feet to the southeast. Both watercourses appear to be intermittent watercourses based on a review of County GIS and CDFW stream mapping data. The watercourse to the north is located at approximately 75 feet below the elevation of the well head of Well 1. The further watercourse to the southeast is approximately 440 feet below the elevation of the well head of Well 2. Therefore, the watercourse to the north would be 45 feet above the screening interval of Well 1 and the watercourse to the southeast would be 240 feet below the screening interval of Well 3.

The intermittent watercourses may contain salmonid habitat, and the watercourses feed into Trinity River which contains salmonid habitat and important public trust resources like fishing, navigation, and recreational opportunities. The elevation difference between the water bearing units and/or the distance to these watercourses is great enough to likely preclude any direct connection between the wells and the stream flows, and therefore the use of the wells is unlikely to have any substantial adverse impact on flow rates.

Based on the facts outlined above, the groundwater wells will not interfere with the Public Trust or substantially impair the public rights to navigation, fisheries, or water related activities or access.

DECISION

NOW, THEREFORE, based on the above findings and evidence, the Humboldt County Planning Commission does hereby:

- Adopt the Negative Declaration for the Organic Liberty CA, LLC Conditional Use Permit Modification, Special Permit, and Zoning Clearance Certificates; and
- Adopt the findings set forth in this resolution; and
- Approve the Conditional Use Permit Modification, Special Permit, and Zoning Clearance Certificates for Organic Liberty CA, LLC subject to the Conditions of Approval attached hereto as Attachment 1A; and

Adopted after review and consideration of all the evidence on **December 19, 2024**.

The motion was made by COMMISSIONER NOAH LEVY and second by COMMISSIONER SARAH WEST and the following vote:

AYES: COMMISSIONERS: Noah Levy, Sarah West, Iver Skavdal, Jerome Qiriazzi, Peggy O'Neill, Lorna McFarlane

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

DECISION: Motion carried 7/0

I, John H. Ford, Secretary to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above-entitled matter by said Commission at a meeting held on the date noted above.



John H. Ford, Director
Planning and Building Department

CONDITIONS OF APPROVAL

APPROVAL OF THE PROJECT (PLN-2024-19054) IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS:

A. General Conditions:

1. The applicant shall submit a check to the Planning Division payable to the Humboldt County Clerk/Recorder in the amount of \$2,916.75. Pursuant to Section 711.4 of the Fish and Game Code, the amount includes the CDFW fee plus the \$50 document handling fee to the Clerk. This fee is effective through December 31, 2024, at such time the fee will be adjusted pursuant to Section 713 of the Fish and Game Code. Alternatively, the applicant may contact CDFW by phone at (916) 651-0603 or through the CDFW website at www.wildlife.ca.gov for a determination stating the project will have no effect on fish and wildlife. If CDFW concurs, a form will be provided exempting the project from the \$2,916.75 fee payment requirement. In this instance, only a copy of the CDFW form and the \$50.00 handling fee is required.
2. The applicant is responsible for obtaining all necessary County and State permits and licenses, and for meeting all requirements set forth by other regulatory agencies.
3. The applicant is required to pay for permit processing on a time and material basis, as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Planning and Building Department will provide a bill to the applicant after the decision. Any and all outstanding planning fees to cover the processing of the application to decision by the Planning Commission shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
4. The applicant is responsible for costs for post-approval review for determining project conformance with conditions. A deposit is collected to cover the staff review. Permit conformance with conditions must be demonstrated prior to release of building permit or initiation of use, and at the time of annual inspection. A conformance review deposit, as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors (currently \$750), shall be paid within sixty (60) days of the effective date of the permit or upon filing of the Compliance Agreement (where applicable), whichever occurs first. Payment shall be made to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
5. A Notice of Determination (NOD) will be prepared and filed with the County Clerk for this project in accordance with the State CEQA Guidelines. The Department will file the NOD and will charge this cost to the project.

6. All requirements of the original Conditions of Approval in Attachment 4 and Mitigation Monitoring Report in Attachment 6 remain in full effect.
7. The applicant shall secure permits for all proposed structures related to the cannabis cultivation and other commercial cannabis activity. A letter or similar communication from the Building Division verifying that all structures related to cannabis cultivation are permitted will satisfy this condition.
8. The approved building plans shall meet all applicable fire codes, including fire suppression infrastructure requirements deemed necessary for the project by the Building Inspection Division. Sign-off on the Occupancy Permit by the Building Division shall satisfy this requirement.
9. The applicant shall submit a comprehensive Light Pollution Prevention Plan for the modified project including all measures necessary to adhere to International Dark Sky Association standards as set forth in the CCLUO, demonstrating that the proposed project would not deliver or have the potential to deliver light pollution, during the hours of sunset to sunrise, affecting fish and/or wildlife directly or from a distance. The plan shall include information about any outdoor lighting utilized and measures to down-shield this lighting. The plan shall be submitted to the satisfaction of the Planning Division within six months of the effective date of this permit, or prior to use of lighting, whichever occurs first.
10. Prior to initiating commercial cannabis cultivation or associated activities the applicant shall obtain all applicable Business Licenses from the Humboldt County Tax Collector.
11. As grading is required for development on the site, the applicant is required to obtain a permit from the Building Inspection Division and the North Coast Air Quality Management District (NCAQMD). Dust control practices during construction and grading shall achieve compliance with NCAQMD fugitive dust emission standards.
12. The permittee shall be compliant with the County of Humboldt's Certified Unified Program Agency (CUPA) requirements regarding hazardous materials. A written verification of compliance shall be required before any provisional permits may be finalized. Ongoing proof of compliance with this condition shall be required at each annual inspection in order to keep the permit valid.
13. The applicant shall enroll to receive power through the Redwood Coast Energy Authority (Re-Power Plus) program or a suitable equivalent source, subject to the approval of the Planning and Building Department.
14. The applicant shall secure an approval of an Air Quality Authority to Construct/Permit to Operate from the NCAQMD for the operation of propane heaters/boilers that will

provide temperature control within the greenhouses and up to three emergency backup generators.

B. Ongoing Requirements/Development Restrictions Which Must be Satisfied for the Life of the Project:

1. The combination of background, generator and greenhouse fan or other operational equipment created noise must not result in the harassment of Northern Spotted Owl species as required to meet the performance standards for noise. The combined noise levels measured at 100 feet or the edge of habitat, whichever is closer, shall be at or below 50 decibels. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service, and further consultation where necessary. A building permit shall be obtained should any structures be necessary for noise attenuation.
2. All artificial lighting shall be fully contained within structures such that no light escapes (e.g., through blackout curtains). Structures shall be enclosed between 30 minutes prior to sunset and 30 minutes after sunrise to prevent disruption to crepuscular wildlife. Security lighting shall be motion activated and comply with the International Dark-Sky Association standards and Fixture Seal of Approval Program; see: <https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/>. Standards include but are not limited to the following, 1) light shall be shielded and downward facing, 2) shall consist of Low-Pressure Sodium (LPS) light or low spectrum Light Emitting Diodes (LED) with a color temperature of 3000 kelvins or less and 3) only placed where needed.
3. Should the Humboldt County Planning Division receive complaints that the lighting or noise is not complying with the standards listed above in items B.1. and B.2., within ten (10) working days of receiving written notification that a complaint has been filed, the applicant shall submit written verification that the lights' shielding, and alignment and noise levels have been repaired, inspected, and corrected as necessary.
4. The applicant shall utilize water meters to demonstrate that there is sufficient water supply to meet the demands of the project. The water use for cultivation is limited to the maximum estimated amount described in the Operations Plan and annual water use records shall be provided prior to or during the annual inspection.
5. The use of synthetic netting is prohibited. To minimize the risk of wildlife entrapment, the applicant shall not use any cultivation or erosion control materials that contain synthetic (e.g., plastic or nylon) netting, including photo- or biodegradable plastic netting. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as jute, hemp, coconut (coir) fiber, or other products without welded weaves.

6. All refuse shall be always contained in wildlife proof storage containers and disposed at an authorized waste management facility.
7. Should any wildlife be encountered during work activities, the wildlife shall not be disturbed and shall be allowed to leave the work site unharmed.
8. The use of anticoagulant rodenticide is prohibited.
9. The noise from operations shall not exceed 58.7, 68.5, or 62.9 decibels at the north, south, and east property lines, respectively, for the life of the project.
10. The applicant shall maintain enrollment in Redwood Coast Energy Authority (Re-Power Plus) or a suitable equivalent to meet the renewable power source requirement for open- air cultivation and shall provide copies of energy bills confirming enrollment at each annual inspection to keep the permit valid.
11. The operator shall provide information to all employees about the potential health impacts of cannabis use on children. Information shall be provided by posting the brochures from the Department of Health and Human Services titled "Cannabis Palm Card" and "Cannabis Rack Card." This information shall also be provided to all employees as part of the employee orientation.
12. All components of the project shall be developed, operated, and maintained in conformance with the Project Description, the approved Site Plan, the Plan of Operations, and these conditions of approval. Any changes shall require modification of this permit except where consistent with Humboldt County Code Section 312-11.1, Minor Deviations to Approved Plot Plan. When offsite processing is chosen to be the preferred method of processing, this permit shall be modified to identify the offsite licensed facility.
13. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the CCLUO and Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), as applicable to the permit type.
14. The permittee shall have possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with MAUCRSA, and regulations promulgated thereunder, as soon as such licenses become available.
15. The permittee shall ensure confinement of the area of cannabis cultivation, processing, manufacture, or distribution to the locations depicted on the approved site plan. The commercial cannabis activity shall be set back at least 30 feet from any property line

and 600 feet from any school, school bus stop, church or other place of religious worship, or tribal cultural resources, except where a reduction to this setback has been approved pursuant to Section 314-55.4.6.4.4 of the CCLUO.

16. The permittee shall maintain enrollment in Tier 1 or 2, certification with North Coast Regional Water Quality Control Board (RWQCB) Order WQ 2019-0001-DWQ, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.
17. The permittee shall consent to an annual on-site compliance inspection, with at least 24 hours prior notice, to be conducted by appropriate County officials during regular business hours (Monday through Friday, 9:00 a.m. to 5:00 p.m., excluding holidays).
18. The permittee shall pay all applicable fees for application review to ensure conformance with conditions and annual inspection fees.
19. Fuel shall be stored and handled in compliance with applicable state and local laws and regulations, including the County of Humboldt's Certified Unified Program Agency (CUPA) program, and in such a way that no spillage occurs.
20. Fertilizer, pesticide, fungicide, rodenticide, or herbicide shall be properly stored, handled and used in accordance with applicable regulations.
21. The master logbooks maintained by the applicant to track production and sales shall be maintained for inspection by the County.
22. The permittee shall pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).

Performance Standards for Cultivation and Processing Operations

23. Pursuant to Business and Professions Code section 26051.5(a)(8), an applicant seeking a cultivation license shall "provide a statement declaring the applicant is an 'agricultural employer,' as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law."
24. Cultivators 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, the California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

25. Cultivators engaged in processing shall comply with the following Processing Practices:
- a. Processing operations must be maintained in a clean and sanitary condition including all work surfaces and equipment.
 - b. Processing operations must implement protocols which prevent processing contamination and mold and mildew growth on cannabis.
 - c. Employees handling cannabis in processing operations must have access to facemasks and gloves in good operable condition as applicable to their job function.
 - d. Employees must wash hands sufficiently when handling cannabis or use gloves.
26. All persons hiring employees to engage in commercial cannabis cultivation and processing shall comply with the following Employee Safety Practices:
- a. Cultivation operations and processing operations must implement safety protocols and provide all employees with adequate safety training relevant to their specific job functions, which may include:
 - (1) Emergency action response planning as necessary;
 - (2) Employee accident reporting and investigation policies;
 - (3) Fire prevention;
 - (4) Hazard communication policies, including maintenance of material safety data sheets (MSDS);
 - (5) Materials handling policies;
 - (6) Job hazard analyses; and
 - (7) Personal protective equipment policies, including respiratory protection.
 - b. Cultivation operations and processing operations must visibly post and maintain an emergency contact list which includes at a minimum:
 - (1) Operation manager contacts;
 - (2) Emergency responder contacts; and
 - (3) Poison control contacts.
 - c. At all times, employees shall have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Plumbing facilities and water source must be capable of handling increased usage without adverse consequences to neighboring properties or the environment.
 - d. Onsite housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

27. All cultivators shall comply with the approved processing plan as to the following:

- a. Processing practices
- b. Location where processing will occur
- c. Number of employees, if any
- d. Employee Safety Practices
- e. Toilet and handwashing facilities
- f. Plumbing and/or septic system and whether or not the system is capable of handling increased usage
- g. Drinking water for employees
- h. Plan to minimize impact from increased road use resulting from processing
- i. Onsite housing, if any

28. Term of Commercial Cannabis Activity Permit. Any Commercial Cannabis Activity Permit issued pursuant to the CCLUO shall expire one (1) year after date of issuance, and on the anniversary date of such issuance each year thereafter, unless an annual compliance inspection has been conducted and the permittees and the permitted site have been found to comply with all conditions of approval.

29. If the inspector or other County official determines that the permittees or site do not comply with the conditions of approval, the inspector shall serve the permit holder with a written statement identifying the items not in compliance, and the action that the permit holder may take to cure the noncompliance, or file an appeal within ten (10) days of the date that the written statement is delivered to the permit holder. Personal delivery or mailing the written statement to the mailing address listed on the application by regular mail, plus three (3) days after date of mailing, shall constitute delivery. The permit holder may request a re-inspection to determine whether or not the permit holder has cured all issues of noncompliance. Failure to request re-inspection or to cure any items of noncompliance shall terminate the permits, immediately upon the expiration of any appeal period, or final determination of the appeal if an appeal has been timely filed pursuant to Section 314-55.4.5.7 of the CCLUO.

30. Permit Renewals to Comply with Updated Laws and Regulations. Permit renewal is subject to the laws and regulations effective at the time of renewal, which may be substantially different than the regulations currently in place and may require the submittal of additional information to ensure that new standards are met.

31. Acknowledgements to Remain in Full Force and Effect. Permittee acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation under any clearance or permit issued in accordance with this section in the event that environmental conditions, such as a sustained drought or low flows in the watershed in which the cultivation area is located, will not support diversions for irrigation.

32. Transfers. Transfer of any leases or permits approved by this project is subject to the review and approval of the Planning Director for conformance with CCLUO eligibility requirements and agreement to permit terms and acknowledgments. The fee for required permit transfer review shall accompany the request. The request shall include the following information:
- a. Identifying information for the new owner(s) and management as required in an initial permit application;
 - b. A written acknowledgment by the new owner in accordance as required for the initial permit application;
 - c. The specific date on which the transfer is to occur;
 - d. Acknowledgement of full responsibility for complying with the existing permit; and
 - e. Execution of an Affidavit of Non-diversion of Commercial Cannabis.
33. Inspections. The permit holder and subject property owner are to permit the County or representative(s) or designee(s) to make inspections at any reasonable time deemed necessary to assure that the activities being performed under the authority of this permit are in accordance with the terms and conditions prescribed herein.

Informational Notes:

1. The applicant shall implement the Inadvertent Discovery Protocol. If cultural resources are encountered during construction activities, the contractor onsite shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the applicant and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99.

CULTIVATION AND OPERATIONS PLAN

ORGANIC LIBERTY CA, LLC

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

Applicant:

Organic Liberty, LLC
Attn: Matthew Primm
P.O. Box 94825
Las Vegas, NV 89193

Prepared by:

4235 Forcum Ave, Suite 100
McClellan Park, CA 95652

COMPASS LAND
— G R O U P —

April 2024

TABLE OF CONTENTS

1.0	GENERAL OPERATIONAL INFORMATION	1
1.1	Contact Information.....	1
1.2	Facility Location	1
1.3	Staffing & Staff Screening Processes	1
1.4	Vehicle Trips.....	1
1.5	Days and Hours of Operation.....	1
1.6	Agricultural Employer Statement	1
1.7	County Access	2
1.8	Employee/Worker Safety.....	2
1.8.1	Job Specific Safety Protocols and Training	2
1.8.2	Emergency Contact List.....	2
1.8.3	Safe Drinking Water	3
1.8.4	On-Site Housing	3
1.9	Consumer Health and Safety	3
1.9.1	Food Safety Training	3
1.9.2	Facility Inspection	3
1.9.3	Sanitary Conditions	3
1.10	General Product and Inventory Management.....	4
1.10.1	Customer Screening, Registration, and Validation Process and Procedures	5
2.0	CULTIVATION PLAN	5
2.1	Schedule of Cultivation Activities	6
2.2	Pest Management Plan	10
2.2.1	Pest Management Practices	10
2.2.2	Pesticides	11
2.3	Fertilizers and Soil Amendments	12
3.0	WATER SOURCE, STORAGE, IRRIGATION, AND ESTIMATED USE	12
4.0	SUMMARY OF SPECIFIC MEASURES FOR COMPLIANCE WITH SWRCB ORDER..	13
5.0	STORMWATER MANAGEMENT PLAN.....	14
5.1	Current Drainage Conditions and Facilities	14
5.2	Site Stormwater Improvements	14
5.3	Site, Erosion Control, and Drainage Feature Maintenance	14
6.0	INVASIVE SPECIES CONTROL PLAN	15

7.0	MATERIALS MANAGEMENT PLAN	15
7.1	Non-Cannabis Solid Waste Disposal	15
7.2	Cannabis Waste Disposal	16
7.2.1	Records of Destroyed Cannabis Product	16
7.3	Hazardous Materials Management Plan	17
7.3.1	Statement	17
7.3.2	Hazardous Material Storage	18
7.3.3	Hazardous Material Disposal	18
8.0	SEWAGE DISPOSAL PLAN	18
9.0	SOILS MANAGEMENT PLAN	18
10.0	PROCESSING PLAN	19
10.1	Processing Practices.....	19
10.2	Product Quality Control	19
10.3	Packaging	20
11.0	PARKING PLAN.....	20
12.0	ENERGY PLAN.....	20
13.0	SECURITY PLAN	20
13.1	Video Surveillance and Lighting	20
13.2	Alarm.....	21
13.3	Access Control.....	21
13.4	Fencing.....	21
14.0	NOISE SOURCE ASSESSMENT AND MITIGATION PLAN	21
15.0	LIGHT POLLUTION CONTROL PLAN.....	21

1.0 GENERAL OPERATIONAL INFORMATION

1.1 Contact Information

Name: Organic Liberty CA, LLC ("Operator" or "Employer")

Contact: Matthew Primm

Contact Address: P.O. Box 94825, Las Vegas, NV 89193

Phone Number: 858.245.3277

1.2 Facility Location

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

1.3 Staffing & Staff Screening Processes

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

1.4 Vehicle Trips

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

1.5 Days and Hours of Operation

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

1.6 Agricultural Employer Statement

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

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

1.7 County Access

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

1.8 Employee/Worker Safety

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

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

1.8.1 Job Specific Safety Protocols and Training

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

1.8.2 Emergency Contact List

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

- Operation manager contacts;
- Emergency responder contacts; and

- Poison control contacts.

1.8.3 Safe Drinking Water

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

1.8.4 On-Site Housing

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

1.9 Consumer Health and Safety

1.9.1 Food Safety Training

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

1.9.2 Facility Inspection

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

1.9.3 Sanitary Conditions

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

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

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

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

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

1.10 General Product and Inventory Management

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

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

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

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

1.10.1 Customer Screening, Registration, and Validation Process and Procedures

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

2.0 CULTIVATION PLAN

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

TABLE 1
CULTIVATION CYCLES

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

2.1 Schedule of Cultivation Activities

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

TABLE 2
TYPICAL SCHEDULE OF CULTIVATION ACTIVITIES

Month	Cultivation Activities		
January	-Mixed-Light: <ul style="list-style-type: none"> Start of 1st cycle for the year -Nursery: <ul style="list-style-type: none"> Clone, propagation, vegetation, & breeding 	April	-Mixed-light: <ul style="list-style-type: none"> Flowering -Light-deprivation: <ul style="list-style-type: none"> Plant 1st cycle -Outdoor: <ul style="list-style-type: none"> Site preparation for planting Farm maintenance -Nursery: <ul style="list-style-type: none"> Clone, propagation, vegetation, & breeding
February	-Mixed-Light: <ul style="list-style-type: none"> Fertigation and irrigation -Nursery: <ul style="list-style-type: none"> Clone, propagation, vegetation, & breeding 	May	-Mixed-light: <ul style="list-style-type: none"> Fertigation and irrigation -Light-deprivation: <ul style="list-style-type: none"> Vegetation -Outdoor: <ul style="list-style-type: none"> Fertigation and irrigation Amend raised beds -Nursery: <ul style="list-style-type: none"> Clone, propagation, vegetation, & breeding
March	-Mixed-light: <ul style="list-style-type: none"> Harvesting 1st cycle Prep and begin 2nd cycle -Light-deprivation: <ul style="list-style-type: none"> Preparation for 1st cycle Maintenance of automated systems -Outdoor: <ul style="list-style-type: none"> Maintenance of raised beds and irrigation system -Nursery: <ul style="list-style-type: none"> Clone, propagation, vegetation, & breeding 		

June	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Harvest 2nd cycle • Prep for 3rd cycle -Light-deprivation: <ul style="list-style-type: none"> • Start 2nd cycle -Outdoor: <ul style="list-style-type: none"> • Fertigation and irrigation -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding
July	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Start of 3rd cycle -Light-deprivation: <ul style="list-style-type: none"> • Harvest • Amend beds • Plant 2nd cycle -Outdoor: <ul style="list-style-type: none"> • Vegetation -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding
August	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Fertigation and irrigation -Light-deprivation: <ul style="list-style-type: none"> • Vegetation -Outdoor: <ul style="list-style-type: none"> • Vegetation -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding

September	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Harvest 3rd cycle • Prep for 4th cycle -Light-deprivation: <ul style="list-style-type: none"> • Vegetation • Flower -Outdoor: <ul style="list-style-type: none"> • Flower • Harvest preparation • Harvest -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding
October	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Start of 4th cycle -Light-deprivation: <ul style="list-style-type: none"> • Harvest -Outdoor: <ul style="list-style-type: none"> • Harvest -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding

November	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Fertigation and irrigation -Light-deprivation: <ul style="list-style-type: none"> • Finish harvesting 2nd cycle • Winterization and maintenance of structures -Outdoor: <ul style="list-style-type: none"> • Finish harvesting • Winterization of raised bed areas • Site cleanup -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding -General: <ul style="list-style-type: none"> • Farm maintenance and site winterization for wet season • Composting of plant wastes
December	<ul style="list-style-type: none"> -Mixed-light: <ul style="list-style-type: none"> • Harvest 4th cycle • Prep for 1st cycle of the new year -Nursery: <ul style="list-style-type: none"> • Clone, propagation, vegetation, & breeding

2.2 Pest Management Plan

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

2.2.1 Pest Management Practices

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

The following products may be used as biological controls:

TABLE 3
LIST OF BIOLOGICAL CONTROL PRODUCTS

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

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

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

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

2.2.2 Pesticides

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

The following list of pesticide products may be used:

TABLE 4
LIST OF PESTICIDE PRODUCTS AND ACTIVE INGREDIENTS

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

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

2.3 Fertilizers and Soil Amendments

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

3.0 WATER SOURCE, STORAGE, IRRIGATION, AND ESTIMATED USE

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

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

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

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

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

TABLE 5
PROJECTED IRRIGATION WATER USAGE
(ACRE-FEET)

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

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

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

4.0 SUMMARY OF SPECIFIC MEASURES FOR COMPLIANCE WITH SWRCB ORDER

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

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

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

5.0 STORMWATER MANAGEMENT PLAN

5.1 Current Drainage Conditions and Facilities

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

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

5.2 Site Stormwater Improvements

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

5.3 Site, Erosion Control, and Drainage Feature Maintenance

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

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

6.0 INVASIVE SPECIES CONTROL PLAN

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

7.0 MATERIALS MANAGEMENT PLAN

7.1 Non-Cannabis Solid Waste Disposal

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

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

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

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

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

7.2 Cannabis Waste Disposal

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

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

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

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

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

7.2.1 Records of Destroyed Cannabis Product

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

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

7.3 Hazardous Materials Management Plan

7.3.1 Statement

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

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

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

7.3.2 Hazardous Material Storage

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

7.3.3 Hazardous Material Disposal

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

8.0 SEWAGE DISPOSAL PLAN

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

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

9.0 SOILS MANAGEMENT PLAN

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

10.0 PROCESSING PLAN

10.1 Processing Practices

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

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

10.2 Product Quality Control

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

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

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

10.3 Packaging

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

11.0 PARKING PLAN

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

12.0 ENERGY PLAN

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

13.0 SECURITY PLAN

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

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

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

13.1 Video Surveillance and Lighting

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

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

13.2 Alarm

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

13.3 Access Control

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

13.4 Fencing

The cultivation area is fenced with chain-link fencing.

14.0 NOISE SOURCE ASSESSMENT AND MITIGATION PLAN

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

15.0 LIGHT POLLUTION CONTROL PLAN

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



