

ATTACHMENT 1B
Cultivation and Operations Plan

Distribution, Processing, Non-Flammable Manufacturing, and Infusion Operations Plan

Updated 9/03/2021

1 DESCRIPTION OF DISTRIBUTION, PROCESSING, NON-FLAMMABLE MANUFACTURING, INFUSION & OPERATIONS

The site is in Miranda with two proposed structures totaling 14,000 sq. ft. The distribution and processing area will evenly split a 12,000 sq. ft. structure. Adjacent to it will be a 2,000 sq. ft structure for non-flammable manufacturing and infusion.

2 structures are proposed for on-site boarding, one existing 1,120 sq. ft. residence, one proposed 5,120 sq. ft. structure.

Distribution operations will take place in a 6,000 sq. ft. secure facility. Which will be sectioned off into purchasing, selling, operations, and storage. The purchasing area will have a separate secure entrance for transport to make deliveries. This area will be designated for product to be purchased. The selling area will consist of a show room where buyers can look at samples of product. The operations area will consist of offices for brands with a packaging area. It will have its own secure pick up area for transport.

Processing operations will take place in a 6,000 sq. ft secure facility. Which will be for hand and machine trimming only. The delivery area will have a separate secure entrance for transport to make deliveries. The main floor will consist of management offices and trimming stations. It will have its own secure pick up area for transport.

Non-Flammable manufacturing and Infusion operations will take place in a self-standing 2,000 sq. ft structure. Flower material will be processed using nonflammable methods including but not limited to water, ice, pressure, and heat.

2 LOCATION AND CAPACITY OF WATER STORAGE FACILITIES

Water Source: All water is obtained by rain catchment tanks/pond a proposed well and an unpermitted existing well.

The proposed rainwater catchment pond is to be sited on a ridge top outside of streamside management areas and have a total minimum capacity of 1M gal. This pond is to be used for fire suppression purposes. A grading permit will be approved by the Humboldt County Building Department before pond construction begins.

The proposed well will be constructed by a licensed driller and permitted by Humboldt County Department of Health and Human Services Division of Environmental Health.

Projected Water Use: Estimated water use is 60,000 gallons per year to be used only for manufacturing and infusion. Projected water use is shown by month in Table 1. Water usage will be recorded monthly.

Table 1: Projected Water Use by month

Projected Water Use in Gallons												
Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
5k	5k	5k	5k	5k	5k	5k	5k	5k	5k	5k	5k	60,000

Water Storage: Water for cannabis facility and fire protection is to be stored on site in minimum 1,000,000-gallon pond. The total hard tank storage capacity is projected to be 30,000 gallons and an additional 2,500 gal. tank to be used for fire suppression.

6,050 gal. of hard tank storage are installed at the homestead residence, 2,500 gal. shall be reserved for fire protection, 3,550 gal. will be used for domestic purposes.

Water Management: Water is distributed by gravity, where possible, and by solar powered electric pumps.

3 STORM WATER MANAGEMENT PLAN

Site Description: The property is located on ridgeline land and ranges from 1800 feet to 2120 feet above mean sea level, surrounded by fir, montane hardwood-conifer, grassland and other species. The land is characterized as having relatively flat grades on the east side of the property with steeper grades located on the west. The *HumGIS Relative Slope Stability* layer designates the area as having moderate instability. Most of the property and drains east towards Fish Creek with a narrow portion of the east side of the property draining east towards an unnamed Tributary of Brock Creek. Fish Creek eventually flows into the South Fork Eel River and Brock Creek flows into Eel River. The climate can be generalized by a pattern of high-intensity rainfall in the late fall until the early spring and hot, dry summers. Mean annual precipitation is approximately 68.8 inches. Soils within the property are primarily composed of Yorknorth-Witherell complex at 30% to 50% slopes.

Once fully operational the site will contain approximately 19,560 sq. ft. of impermeable surfaces as described in table 2. The approximate sizes of the homestead residence and guest house are not yet known and are unaccounted for in the above area of impermeable surfaces. Pending further consultation with architects and contractors the footprint of these structures will be determined and the planning department will be updated accordingly.

Table 2: Inventory of proposed impermeable surfaces

Facility	Impermeable Area (sq. ft.)
Processing & Distribution Building	12,000
Non-Flammable and Infusion Manufacturing Building	2,000
Boarding House	1,280
Boarding House	5,120
Break Room	1,280
Generator Shed	160
Total	21,840

The site will contain approximately 0.5 mi. of private access roads. These roads are to be regraded and rocked; no drainage structures currently exist on the road. No Stream crossings exist on the portions of the road utilized for commercial cannabis activities. A single ditch relief culvert is located at the ingress of the property on Barnum road, the outlet is partially plugged and is to be replaced.

Runoff and Erosion Control Measures:

The development of this site will require an engineered grading plan. This plan shall detail all required sediment runoff and erosion control measures. The applicant will follow all measures prescribed in this document.

In general, proposed buildings will be equipped with drain and gutter systems discharging onto well vegetated areas outside streamside management areas. Discharge points will be armored with energy dissipating structures to disperse concentrated flow and prevent erosion and sediment delivery. Storm water runoff will be directed to well vegetated areas with low to moderate slopes outside of streamside management areas allowing ample opportunity for sediment filtration and infiltration of water into ground water.

The private access road is to be regraded, out sloped where feasible, and rocked.

Once developed all areas of disturbed earth at the site will be seeded with native erosion control grass seed mix and mulched at a rate on 2 tons per acre.

Interim erosion prevention and sediment capture measures shall be implemented within seven days of completion of grading and land disturbance activities, and shall consist of erosion prevention measures and sediment capture measures including:

- Erosion prevention measures are required for any earthwork that uses heavy equipment (e.g., bulldozer, compactor, excavator, etc.). Erosion prevention measures may include surface contouring, slope roughening, and upslope storm water diversion. Other types of erosion prevention measures may include mulching, hydroseeding, tarp placement, revegetation, and rock slope protection.
- Sediment capture measures include the implementation of measures such as gravel bag berms, fiber rolls, straw bale barriers, professionally installed silt fences, and sediment settling basins.

Long-term erosion prevention and sediment capture measures shall be implemented as soon as possible and prior to the onset of fall and winter precipitation. Long-term measures may include the use of heavy equipment to reconfigure access roads or improve access road drainage, installation of properly sized culverts, gravel placement on steeper grades, and stabilization of previously disturbed land. Maintenance of all erosion protection and sediment capture measures is required year-round. Early monitoring allows for identification of problem areas or underperforming erosion or sediment control measures. Verification of the effectiveness of all erosion prevention and sediment capture measures is required as part of winterization activities

For areas outside of riparian setbacks or for upland areas, the applicant shall ensure that rock placed for slope protection is the minimum amount necessary and is part of a design that provides for native plant revegetation. If retaining walls or other structures are required to provide slope stability, they shall be designed by a Qualified Professional.

The applicant shall monitor erosion control measures during and after each storm event that produces at least 0.5 in/day or 1.0 inch/7 days of precipitation, and repair or replace, as needed, ineffective erosion control measures immediately.

The applicant shall only use geotextiles, fiber rolls, and other erosion control measures made of loose-weave mesh (e.g., jute, coconut (coir) fiber, or from other products without welded weaves). To minimize the risk of ensnaring and strangling wildlife, the applicant shall not use synthetic (e.g., plastic or nylon) monofilament netting materials for erosion control for any cannabis cultivation activities. This prohibition includes photo- or bio-degradable plastic netting

4 WATERSHED + HABITAT PROTECTION

All areas proposed for commercial cannabis activities are located outside of streamside management areas, sediment laden water discharged from these areas will have ample opportunity to be filtered through vegetation prior to entering a surface water course.

All trash, recycling, amendments, fertilizers, and other cultivation related materials are stored such that they are secured from wildlife and cannot be released into the natural environment.

A Biological Reconnaissance Assessment has also been prepared for this application detailing potential impacts of site development and operation.

5 MATERIALS MANAGEMENT PLAN

The Apartment, LLC shall maintain a self-haul waste area and a compost area on site. Refuse and garbage is stored in a location and manner that prevents its discharge to receiving water and discourages wildlife from interacting with waste materials. Non-compostable solid waste and recyclables derived from the operations shall be placed in the self-haul waste area and periodically transported to a local transfer station. Solid waste may include, but is not limited to household trash, product packaging and consumables. All waste plant material will be composted on site.

The applicant shall keep and use absorbent materials designated for spill containment and spill cleanup equipment on-site for use in an accidental spill of petroleum products, hazardous materials, and other substances which may degrade waters of the state. The cannabis cultivator shall immediately notify the California Office of Emergency Services at 1-800-852-7550 and immediately initiate cleanup activities for all spills that could enter a waterbody or degrade groundwater.

The applicant shall have a storage area for petroleum or other liquid chemicals (including diesel, gasoline, oils, etc.). All such storage areas shall comply with the riparian setback Requirements, be in a secured location in compliance with label instructions, outside of areas of known slope instability, and be protected from accidental ignition, weather, and wildlife. All storage areas shall have appropriate secondary containment structures, as necessary, to protect water quality and prevent spillage, mixing, discharge, or seepage. Storage tanks and containers must be of suitable material and construction to be compatible with the substances stored and conditions of storage, such as pressure and temperature.

The applicant shall only keep hazardous materials in their original containers with labels intact and shall store hazardous materials to prevent exposure to sunlight, excessive heat, and precipitation. The applicant shall provide secondary containment for hazardous materials to prevent possible exposure to the environment. Disposal of unused hazardous materials and containers shall be consistent with the label.

The applicant shall only mix, prepare, apply, or load hazardous materials outside of the riparian setbacks.

Storage Area: Trash and recycling are stored in wildlife proof containers adjacent to buildings and are disposed of regularly.

Removal Frequency: Trash is removed from site once a week or more as needed.

Disposal Facility: Redway transfer station.

Fuel: Diesel will be used on site for equipment and generators.

The applicant shall only refuel vehicles or equipment outside of riparian setbacks. The applicant shall inspect all equipment using oil, hydraulic fluid, or petroleum products for leaks prior to use and shall monitor equipment for leakage. Stationary equipment (e.g., motors, pumps, generators, etc.) and vehicles not in use shall be located outside of riparian setbacks. Spill and containment equipment appropriate for the conditions at and near the site (e.g., oil spill booms if surface water could be impacted by a spill, sorbent pads, etc.) shall be stored onsite at all locations where equipment is used or staged.

The applicant shall store petroleum, petroleum products, and similar fluids in a manner that provides chemical compatibility, provides secondary containment, and protection from accidental ignition, the sun, wind, and rain.

Spill Cleanup Plan: Spill kits shall be in an Agricultural Chemical and Fertilizer storage shed for immediate use to clean up any agricultural chemical or petroleum product spills. Discharger will maintain spill kits by restocking whenever any materials are used, deteriorated, or expired.

The following procedure is to be used is the event of a hazardous material spill:

I. **Risk Assessment:** The moment a spill occurs and throughout the response, risks will be determined that may affect human health, the environment, and property. The spilled material and quantity released will be and determined.

II. **Selection of Personal Protective Equipment:** The appropriate Personal Protective Equipment (PPE) is selected to safely respond to the spill will be determined. MSDS and literature from Chemical and PPE manufacturers will be used to make this determination. If there is uncertainty of the danger and the spilled material is unknown, the worst will be assumed, and the highest level of protection will be implemented.

III. **Spill Confinement:** As quickly as possible the spill area will be confined. Use of contained absorbents such as socks and booms will be implemented. Priority will be given to stop the flow of the liquid before it has a chance to contaminate a water source. Spill kits will be used to facilitate a quick, effective response.

IV. **Stopping the Source:** After the spill has been confined, the source of the spill will be stopped. This may simply involve turning a container upright or plugging a leak from a damaged drum or container. Putty, barrel patches, and cone plugs will be used to stop leaks. Material will be transferred from the damaged container to a new one.

V. **Incident evaluation and cleanup implementation:** Once the spill has been confined and the leak has been stopped, the incident will be assessed and a plan of action for implementing the spill clean-up will be developed. Pillows and mat pads will be used to absorb the remainder

of the spill. Once the absorbents are saturated, they will be considered hazardous waste and disposed of accordingly.

VI. **Decontamination:** Site, personnel and equipment will be decontaminated by removing or neutralizing the hazardous materials that have accumulated during the spill. This may involve removing and disposing of contaminated media such as soil that was exposed during the spill incident.

6 SEWAGE DISPOSAL PLAN

Two septic systems are proposed for the site. One septic system is existing and located near the existing residence to be used as boarding. The second shall be located adjacent to the area proposed for commercial cannabis development. An engineering firm has been retained to design and permit the systems. Processing, distribution, and manufacturing/ infusion facilities will be equipped with ADA restrooms.

7 DISTRIBUTION PLAN

Distribution Practices: Distribution shall take place in a 6,000 sq. ft. space and is indicated on the plot plan.

All distribution methods utilized will comply with all industry, county, and state rules and guidelines.

All work surfaces and equipment maintained in a clean and sanitary condition. Protocols to prevent contamination of cannabis product with mold and mildew to be strictly followed.

Distribution operations include the following Practices:

- (1) Distribution operations will be maintained in a clean and sanitary condition including all work surfaces and equipment.
- (2) Distribution operations will implement protocols which prevent packaging contamination and mold and mildew growth on cannabis.
- (3) Employees handling cannabis will have access to facemasks and gloves in good operable condition as applicable to their job function.
- (4) Employees will wash hands sufficiently when handling cannabis or use gloves.

Inventory Control Processes and Procedures:

- (1) METRC shall be used to track inventory throughout the distribution facility. The Facilities inventory control process includes tracking of all incoming products, including the name and state license number of the cultivator, the testing lab data (as applicable), the strain, the suppliers product tracking identification data, and bill of lading from the transport company.
- (2) All incoming raw materials will be assigned a unique batch number that can be cross-referenced to the above referenced data and stays with the product through the distribution process and to final sale to our authorized customer.
- (3) All outgoing product will be tracked by SKU, batch number, invoice, and shipping documents; unless the product is not for sale and will be destroyed. The process for the documenting product to be destroyed is described separately in this manual.
- (4) The methodologies for tracking and inventory control may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required.

Product Quality Control and Packaging:

- (1) In addition to meeting all State and local requirements for product quality control, the standard procedures for operation will include the following:
 - a. Samples of all products will be screened and tested by an independent State licensed and/or locally permitted licensed laboratory for pesticides, mold, and other undesirable qualities prior to distribution.
 - b. Documentation of all lab test results will be kept on file.
 - c. Packaging and labeling will meet California regulations

Access Control:

All Entrances to the facility will be restricted by an access control system capable of identifying authorized personal. The system will also be capable of limiting personnel access to the appropriate locations within the facility depending on the persons job and responsibilities, and limit facility access to certain times and days as appropriate. 24 hour access to the facility by emergency responders (Fire Department) will be provided via Knox Box.

Staffing + Staff Screening Processes

The facility will require 10 full time employees.

All candidates for staff will undergo criminal background checks as part of the standard screening process. To the maximum effect allowed by California and federal employment law, candidates with a violent criminal history or a history of drug abuse will be screened from employment.

Customer Screening Process, Registration, and Validation Process and Procedures.

The Facility is for the purpose of distribution and all the products will be sold to state licensed facilities on a wholesale basis. As this is the case, the facility will not be open to the public and 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 near the product, but in all cases shall be supervised. Any other vendors or maintenance workers allowed in the facility will be at all times escorted and sequestered from the finished raw and finished products.

Days and Hours of Operation

The facility is not open to the general public and will not accept visitors without a specific business purpose.

Hours of operation will typically be from 5 AM to 5 PM; eight hours per work shift. Commercial activities such as shipping and receiving will be limited to 5AM to 5PM.

Employee Safety Practices: Distribution operation implements best practices to the highest degree feasible. The operation follows all safety protocols and provides all employees with adequate safety training pursuant to County and State regulations and guidance. Employee safety practices will be following standards set forth by the County and State which may include the following and additional elements:

- Emergency action response planning as necessary; employee accident reporting and investigation policies; fire prevention; hazard communication policies; maintenance of material safety data sheets (MSDS); materials handling policies; job hazard analyses; and personal protective equipment policies, including respiratory protection.
- Visibly posted emergency contact list that includes operation manager, emergency responder contacts, and poison control contacts.

Safe Drinking Water, Toilets, and Sanitary Facilities

At all times, employees will have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations.

Domestic water shall be sourced from an onsite well.

Distribution facilities shall be equipped with ADA bathrooms and connected to a permitted septic system.

Increased Road Use:

Estimated eight trips per day during peak operations and four trips per day during normal operations. No significant noise or traffic impacts are anticipated on access roads or impacts to neighboring properties are anticipated for distribution activities.

Boarding: Employees will have on-site boarding available

Distribution Schedule

Month	Activities
January	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
February	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
March	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
April	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
May	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
June	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
July	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
August	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
September	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
October	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
November	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product
December	Buy, Sell, Oversee Testing, Weigh, Package, Transport Product

8 PROCESSING PLAN

Processing Practices:

Processing shall take place in a 6,000 sq. ft. building and is indicated on the plot plan. It will be a secured area with controlled access.

All processing methods utilized will comply with all industry, county, and state rules and guidelines.

All work surfaces and equipment maintained in a clean and sanitary condition. Protocols to prevent contamination of cannabis product with mold and mildew to be strictly followed. The climate of the processing room is incredibly important. Climate control minimizes the introduction of harmful bacteria, mold, and mildew. The moisture level of the cannabis product should not go up or down after leaving the curing phase. The temperature and humidity in the processing room will be controlled so that the targeted moisture content at the end of curing is maintained throughout the processing cycle. Controlling humidity and the temperature is vital.

When raw cannabis product is brought from storage, it's taken to the processing room where a team of people prepare it. Below are the best practices for setup of the environment to ensure optimal cannabis processing.

Processing operations include the following Processing Practices:

- 1) Processing operations will be maintained in a clean and sanitary condition including all work surfaces and equipment.
- (2) Processing operations will implement protocols which prevent processing contamination and mold and mildew growth on cannabis.
- (3) Employees handling cannabis in processing operations will have access to facemasks and gloves in good operable condition as applicable to their job function.
- (4) Employees will wash hands sufficiently when handling cannabis or use gloves. They will also wear hair nets, masks, and a clean Tyvek suit.
- (5) To prevent respiratory issues an air filtration system will be in operation during processing of the raw cannabis materials to remove and or other particles and contaminates.
- (6) Lean manufacturing and minimal motion should be practiced to complete tasks. Every person on the processing team should minimize the motions they go through to accomplish their assigned task.

Processing Cannabis:

- (1) A manager will be responsible for the removal of bins from the locked storage room. Said individual will open bin examine content for proper level of moisture. If the content is deemed ready for trimming this individual will weigh bin content, then remove it from storage and bring into processing room. Here it will be this person's job to remove trimmable cannabis from stalk and branches then deliver material to trimmers. Stalk, branches, and large waste material will be weighed, toted, and returned to locked storage area. This material will be used for secondary manufacturing or disposed of. Trimmers remove the leaf from bud. Trimmers use precise strategic cuts to minimize the agitation and movement in the trimming process. Finished product and waste product (leaf) is routinely collected by managers, weighed then stored in locked area awaiting packaging.
- (2) Trimming may also be done by trimming machines.
- (3) Packaging falls into two different categories:
 - (1) Packaging of finished cannabis buds will be in appropriate quantities by weights. The filled packaging will be vacuumed sealed and placed into the secured storage area.
 - (2) Temporary packaging of all trim will be bagged for use in secondary manufacturing and put back into locked storage. Packaging operations will be supervised by the manager.

- (4) Weights of raw and finished cannabis, as well as by-product, will be entered into the inventory track and trace system, the inventory management process reconciles the raw material weight to the finished weight and by-product weight.

Inventory Control Processes and Procedures:

- (1) METRC shall be used to track inventory throughout the processing facility. The Facilities inventory control process includes tracking of all incoming products, including the name and state license number of the cultivator, the testing lab data (as applicable), the strain, the suppliers product tracking identification data, and bill of lading from the transport company.
- (2) All incoming raw materials will be assigned a unique batch number that can be cross-referenced to the above refenced data and stays with the product through the distribution process and to final sale to our authorized customer.
- (3) All outgoing product will be tracked by SKU, batch number, invoice, and shipping documents; unless the product is not for sale and will be destroyed. The process for the documenting product to be destroyed is described separately in this manual.
- (4) The methodologies for tracking and inventory control may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required.

Access Control:

All Cannabis deliveries will be received at the facility from a State and/or locally permitted licensed distribution/ transport company; and all cannabis infused products will be transported to State licensed and/or locally permitted licensed cannabis wholesale, distribution, or manufacturing companies by State licensed and/or locally permitted licensed transport company.

Transport:

All Entrances to the facility will be restricted by an access control system capable of identifying authorized personal. The system will also be capable of limiting personnel access to the appropriate locations within the facility depending on the persons job and responsibilities, and limit facility access to certain times and days as appropriate. 24 hour access to the facility by emergency responders (Fire Department) will be provided via Knox Box.

Staffing + Staff Screening Processes:

The facility will require 5 full time employees and 15 seasonal employees during peak operations.

To the maximum effect allowed by California and federal employment law, candidates with a violent criminal history or a history of drug abuse will be screened from employment.

Customer Screening Process, Registration, and Validation Process and Procedures:

The Facility is for the purpose of distribution and all the products will be sold to State licensed facilities on a wholesale basis. As this is the case, the facility will not be open to the public and 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 near the product, but in all cases always supervised. Any other vendors or maintenance workers allowed in the facility will be at all times escorted and sequestered from the finished raw and finished products.

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 9 AM to 9 PM; eight hours per work shift. Commercial activities such as shipping and receiving will be limited to 10AM to 4PM.

Employee Safety Practices:

Cultivation and processing operations implement best practices to the highest degree feasible. The operation follows all safety protocols and provides all employees with adequate safety training pursuant to County and State regulations and guidance. Employee safety practices will be following standards set forth by the County and State which may include the following and additional elements:

- Emergency action response planning as necessary; employee accident reporting and investigation policies; fire prevention; hazard communication policies; maintenance of material safety data sheets (MSDS); materials handling policies; job hazard analyses; and personal protective equipment policies, including respiratory protection.
- Visibly posted emergency contact list that includes operation manager, emergency responder contacts, and poison control contacts.

Safe Drinking Water, Toilets, and Sanitary Facilities:

At all times, employees will have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations.

Domestic water shall be sourced from an onsite well.

Processing facilities shall be equipped with ADA bathrooms and connected to a permitted septic system.

Increased Road Use:

Estimated eight trips per day during peak operations and four trips per day during normal operations. No significant noise or traffic impacts are anticipated on access roads or impacts to neighboring properties are anticipated for processing activities.

Boarding: Employees will have on-site boarding available

Processing Schedule

Month	Activities
January	Drying / Curing / Trimming / Packaging
February	Drying / Curing / Trimming / Packaging
March	Drying / Curing / Trimming / Packaging
April	Drying / Curing / Trimming / Packaging
May	Drying / Curing / Trimming / Packaging
June	Drying / Curing / Trimming / Packaging
July	Drying / Curing / Trimming / Packaging
August	Drying / Curing / Trimming / Packaging
September	Drying / Curing / Trimming / Packaging
October	Drying / Curing / Trimming / Packaging
November	Drying / Curing / Trimming / Packaging
December	Drying / Curing / Trimming / Packaging

9 NON-FLAMMABLE MANUFACTURING AND INFUSION PLAN

Non-Flammable Manufacturing and Infusion Practices:

Shall take place in a 2,000 sq. ft. space and is indicated on the plot plan.

All manufacturing methods utilized will comply with all industry, county, and state rules and guidelines.

All work surfaces and equipment maintained in a clean and sanitary condition. Protocols to prevent contamination of cannabis product with mold and mildew to be strictly followed.

Manufacturing operations include the following Practices:

- (1) Manufacturing operations will be maintained in a clean and sanitary condition including all work surfaces and equipment.
- (2) Manufacturing operations will implement protocols which prevent packaging contamination and mold and mildew growth on cannabis.
- (3) Employees handling cannabis will have access to facemasks and gloves in good operable condition as applicable to their job function.
- (4) Employees will wash hands sufficiently when handling cannabis or use gloves.

Cannabis Water-Based Concentrate and Infusion Production:

- (1) The packaged and manufactured products produced by the facility will include a changing and evolving variety of cannabis based and infused products of varying forms and types, including but not limited to packaged flowers, infused edibles, oils, chewables, and other cannabis products.
- (2) The facility will ensure that all equipment, counters and surfaces used in the production of a Concentrate is food-grade including ensuring that all counters and surface areas were constructed in such a manner that it reduces the potential for the development of microbials, molds and fungi and can be easily cleaned.
- (3) The facility will ensure that any room in which dry ice is stored or used in the processing Marijuana into a Concentrate is well ventilated to prevent against the accumulation of dangerous levels of CO2.
- (4) The facility will ensure that the appropriate safety or sanitary equipment, including personal protective equipment, is provided to, and appropriately used by each employee engaged in the production of a Concentrate.

Inventory Control Processes and Procedures:

- (1) METRC shall be used to track inventory throughout the manufacturing and infusion facility. The Facilities inventory control process includes tracking of all incoming products, including the name and state license number of the cultivator, the testing lab data (as applicable), the strain, the suppliers product tracking identification data, and bill of lading from the transport company.
- (2) All incoming raw materials will be assigned a unique batch number that can be cross-referenced to the above referenced data and stays with the product through the distribution process and to final sale to our authorized customer.
- (3) All outgoing product will be tracked by SKU, batch number, invoice, and shipping documents; unless the product is not for sale and will be destroyed. The process for the documenting product to be destroyed is described separately in this manual.
- (4) The methodologies for tracking and inventory control may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required.

Transport:

All entrances to the facility will be restricted by an access control system capable of identifying authorized personal. The system will also be capable of limiting personnel access to the appropriate locations within the facility depending on the persons job and responsibilities, and also limit facility access to certain times and days as appropriate. 24 hour access to the facility by emergency responders (Fire Department) will be provided via Knox Box.

Staffing + Staff Screening Processes:

The facility will require 2 full time employees and 2 seasonal employees during peak operations.

To the maximum effect allowed by California and federal employment law, candidates with a violent criminal history or a history of drug abuse will be screened from employment.

Customer Screening Process, Registration, and Validation Process and Procedures:

The Facility is for the purpose of distribution and all the products will be sold to State licensed facilities on a wholesale basis. As this is the case, the facility will not be open to the public and 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 near the product, but in all cases always supervised. Any other vendors or maintenance workers allowed in the facility will be at all times escorted and sequestered from the finished raw and finished products.

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 9 AM to 5 PM; eight hours per work shift. Commercial activities such as shipping and receiving will be limited to 10AM to 4PM.

Employee Safety Practices:

Cultivation and processing operations implement best practices to the highest degree feasible. The operation follows all safety protocols and provides all employees with adequate safety training pursuant to County and State regulations and guidance. Employee safety practices will be following standards set forth by the County and State which may include the following and additional elements:

- Emergency action response planning as necessary; employee accident reporting and investigation policies; fire prevention; hazard communication policies; maintenance of material safety data sheets (MSDS); materials handling policies; job hazard analyses; and personal protective equipment policies, including respiratory protection.
- Visibly posted emergency contact list that includes operation manager, emergency responder contacts, and poison control contacts.

Health and Safety:

- (1) All processing and food (Edible Marijuana-Infused Product) employees will have adequate knowledge of, and will be professionally trained in, food safety as it relates to their assigned duties.
- (2) There will be at least one food safety certified employee at the facility responsible for setting policy and providing training to employees. The

certified employee need not be present at the food facility during all hours of operation.

- (3) The employee will be responsible for ensuring that all employees who handle, or have responsibility for handling harvested marijuana, have sufficient knowledge to ensure the safe preparation of the product. The nature and extent of the knowledge that each employee is required to have may be tailored, as appropriate, to the employee's duties.

Sanitary Conditions:

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

- (1) That any person who, by medical 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 Marijuana and Marijuana-Infused Product will be excluded from any operations which may be expected to result in contamination until the condition is corrected.
- (2) Hand-washing facilities will be adequate and convenient and be furnished with running water at a suitable temperature. Hand-washing stations will be in the Facility and 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.
- (3) That all persons working in direct contact with Marijuana and Marijuana-Infused Product will conform to hygienic practices while on duty, including but not limited to:
 - a. Maintaining adequate personal cleanliness.
 - b. 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.
 - c. Refraining from having direct contact with Marijuana and Marijuana Infused Product if the person has or may have an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination, until such condition is corrected.

- (4) That litter and waste are carefully 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 Marijuana and Marijuana-Infused Products are exposed.
- (5) That floors, walls, and ceilings of the processing and manufacturing areas are constructed in such a manner that they may be adequately cleaned, and each is kept clean and in good repair.
- (6) That there is adequate lighting in all areas where Marijuana and Marijuana-Infused Product are stored, and where equipment or utensils are cleaned.
- (7) That there is adequate screening or other protection against the entry of pests. Rubbish will be disposed of to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage, or breeding place for pests.
- (8) That fixtures and other facilities are maintained in a sanitary condition.
- (9) That toxic cleaning compounds, sanitizing agents, and other chemicals will be identified, held, stored and disposed of in a manner that protects against contamination of Marijuana or Marijuana-Infused Product and in a manner that is in accordance with any applicable local, state or federal law, rule, regulation or ordinance.
- (10) That Marijuana and Marijuana-Infused Product that can support the rapid growth of undesirable microorganisms are held in a manner that prevents the growth of these microorganisms.

Safe Drinking Water, Toilets, and Sanitary Facilities

At all times, employees will have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations.

Domestic water shall be sourced from an onsite well.

Manufacturing and infusion facilities shall be equipped with ADA bathrooms and connected to a permitted septic system.

Increased Road Use:

Estimated one trip per day normal operations. No significant noise or traffic impacts are anticipated on access roads or impacts to neighboring properties are anticipated for processing activities.

Boarding: Employees will have on-site boarding available

Manufacturing Schedule

Month	Activities
January	Manufacturing and packaging
February	Manufacturing and packaging
March	Manufacturing and packaging
April	Manufacturing and packaging
May	Manufacturing and packaging
June	Manufacturing and packaging
July	Manufacturing and packaging
August	Manufacturing and packaging
September	Manufacturing and packaging
October	Manufacturing and packaging
November	Manufacturing and packaging
December	Manufacturing and packaging

10 PARKING PLAN

There shall be a total of 17 parking spaces, one parking space for every two employees per Ordinance No. 2599, amending sections 314-55.4, 314-55.3.11.7, 314-55.3.7 and 314-55.3.15 of Title III, Division 1, Chapter 4, Section 55.4.6.12.14, part f.2 of the Humboldt County Code. The expected maximum number of employees on site is 34; therefore, there shall be 17 parking spaces for The Apartment operations. The parking area shall include a firetruck turnaround area as defined in Title III, Division 11, Chapter 2, Section 3112-7 of the Humboldt County Code.

11 ENERGY PLAN

100% of all energy will be renewable. A generator will be utilized ONLY in an emergency.

The Apartment Distribution, Processing, Non-Flammable and Infusion will conform to energy performance standards listed in Ordinance No. 2599, amending sections 314-55.4, 314-55.3.11.7, 314-55.3.7 and 314-55.3.15 of Title III, Division 1, Chapter 4, Section 55.4.12.5.1 of the Humboldt County Code.

The entire facility will utilize energy efficient LED Lighting. All structures will conform to the strictest energy efficient standards.

12 SECURITY PLAN

- (1) Solar Lighting- Motion sensor lighting is installed around the facilities such that the site can be monitored efficiently.

- (2) Alarm- There is an informal community watch in place in the neighborhood. Alarm systems shall be installed at the processing facility, distribution facility, non-flammable manufacturing/infusion facility.
- (3) Access Control- Entrance to the site is restricted by a locked gate and located at the end of the road.
- (4) All products will be stored in locked locations. The security measures will secure cannabis against diversion by protecting against theft not only from intruders, but also from staff members and other parties onsite. This is done by limiting access into the facility and by surveillance monitoring of personnel and visitors when near the product. Strict inventory control measures will also be engaged to prevent and detect diversion.
- (5) CCTV all property
- (6) Secure Key fobs to enter facilities
- (7) Security fence around commercial operations
- (8) Natural barriers and location
- (9) Security always onsite 24/7/365
- (10) All finished product will be locked in the storage room.

13 LIGHTING POLLUTION CONTROL PLAN

Security lighting will 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.

Facility and vicinities shall be self-inspected twice annually at nighttime during artificial light use period to assure the continued effectiveness of light containment measures. The Dark Sky Monitoring Form is included in the Appendix.

14 NOISE SOURCE ASSESSMENTS AND MITIGATION PLAN

Generators located on site and will be in insulated generator sheds. Combined decibel level for all noise sources at the property line shall be no more than 60 decibels. Noise shall be monitored monthly to assure that noise dampening measures remain effective. The Noise Monitoring Form is included in the Appendix.

Appendix

1 THE APARTMENT DARK SKY MONITORING FORM

Self-inspection to be conducted after dark, twice annually when supplemental artificial lighting is in use.

Name: _____

Date: _____

Time: _____

Walk perimeter of greenhouses.

Is light visible? No Yes

If yes describe:

Observe cultivation area from road.

Location of observation:

Observation approximate distance from cultivation areas:

Is light visible? No Yes

If yes describe:

Other Notes/Observations:

2 THE APARTMENT NOISE MONITORING FORM

Self-inspection to be conducted monthly.

Name: _____

Date: _____

Time: _____

Combined decibel level for all noise sources, including generators, at the property line shall be no more than 60 decibels.

Is decibel reading at 60 decibels or under at property lines? No Yes

If no, describe mitigation measures to ensure noise management at property line:

(Fill If Applicable)

Location of generator shed:

Decibel reading at generator shed:

Decibel reading at 100 feet away (in clear sight; no obstruction):

Is decibel reading 50 decibels or under? No Yes

If no, how far away until 50 decibels or under (in clear sight; no obstruction)?

(Fill If Applicable)

Location of second generator shed:

Decibel reading at generator shed:

Decibel reading at 100 feet away (in clear sight; no obstruction):

Is decibel reading 50 decibels or under? No Yes

If no, how far away until 50 decibels or under (in clear sight; no obstruction)?

Other Notes/Observations: