



OPERATIONS PLAN
FULL PARDON FARMS LLC
APN: 216-081-008-000

APPLICATION COMPILED BY:



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CONSULTANTS

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Full Pardon Farms LLC

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Project Description: The applicant is seeking approval of a Special Permit for existing 10,000 square feet of full-term outdoor cultivation labeled as Cultivation Area B on the site Plan.

The applicant acknowledges that the commercial cannabis activity approval being sought under the aforementioned special permit application, pursuant to CMMLUO, is subject to compliance with all other applicable Humboldt County zoning and land use regulations, as well as other applicable provisions of the Humboldt County Code and applicable state laws. A determination of compliance will require multi-agency review of activities/development described in the aforementioned permit application and in some cases, site inspections. If development and/or activities on the subject parcel are determined, for some reason, to be out of compliance with any applicable State or County code, regulation or policy, a compliance agreement can be formulated between the applicant and relevant agency or agencies, which includes a compliance timeline whereby operations may continue under a "Provisional Clearance or Permit" and corrective action is initiated to achieve compliance under agreed upon terms.

Parcel Information: The subject parcel 216-081-008 is approximately 169 acres, Present zoning: AE-B-5(160). General Plan Designation: AG. The property assessed consists of two parcels 216-081-008 and 216-083-006 totaling approximately 355 acres, Both Parcels have active Cultivation permits pending. The property is located in Section 30 & 31, T4S, R5E, HB&M, Humboldt County, from the Harris 7.5' USGS Quad Map.

Topography/Landscape: This property is approximately .2 miles north east of Harris and accessed via Bell Springs Road. The parcel resides on top of the ridge which ranges from approximately 2300-2800 feet in elevation. Vegetation on the property primarily consists of oak woodland with some grasslands. Slopes on the property average 31 %.

Roads/Stream Crossings/Easements: Seven unnamed watercourses are located on the property. These un-named watercourses drain into Rancheria Creek and Perington Creek. Rancheria Creek is tributary to the East Branch of the South Fork Eel River. Perington Creek is tributary to the Main Stem Eel River.

From Bell springs Road enter the parcel on the gravel road which travels along the top of a prominent ridge. The cultivation exists off a branch of the road that stems to the North/East side of the ridge. Interior road conditions will be assessed in the development of a site -specific Water Resources Protection Plan (WRPP WDID 1B161473CHUM) compiled by Timberland Resource Consultants in November 2018. Where necessary, the WRPP prescribes corrective measures to upgrade specific road condition deficiencies identified and sets a time frame in which to complete work. Work prescribed within a WRPP does not preclude the need to comply with other state and county road requirements applicable to the aforementioned permit application. A copy of the newly released WRPP is attached with this submittal

Utilities: Water pump.

Building/Structures/Facilities: None on this parcel at this time. A residence and a garage as well as an AG barn are located on the parcel 216-083-006 that borders to the south.

Surface Water Features: Seven unnamed watercourses are located on the property. These un-named watercourses drain into Rancheria Creek and Perington Creek. Rancheria Creek is tributary to the East Branch of the South Fork Eel River. Perington Creek is tributary to the Main Stem Eel River. Existing livestock rain catchment pond on the East slope, close to the top of the ridge.

Water Sources Serving Property: Water serving this parcel is supplied by gravity flow from the rain catchment pond labeled as POND A on the site plan. One 500 gallon tank will be used for fertilizing. A Initial Statement of Water Diversion and Use was filed with the State Water Resources Control Board June 2017 this document is included within the application package.

Water Storage: One 500 gallon tank located at the Cultivation site. Pond A is approximately 260'x120'x10'. This pond is estimated to hold more than 1,400,000 gallons. This quantity of water storage is sufficient to comply with the forbearance period. Quantities of water utilized shall be recorded monthly once the applicant installs water meters on the outlet of the ponds.

Cultivation Areas: Cultivation Area B is 10,000 ft² of area with cultivation consisting of full term outdoor plants which is fully fenced.

Proposed cultivation areas and surrounding ground surfaces was evaluated in the development of a site-specific Water Resources Protection Plan (WRPP WDID: 1B161473CHUM) prepared by Timberland Resource Consultants November 2018. If deemed necessary, the WRPP will prescribe corrective measures to address conditions which may adversely impact water resources and it will establish a timeline in which to achieve compliance with RWQCB Order No.2015-0023. Corrective measures prescribed in the WRPP do not preclude the need for Cultivation Areas or other manmade features to be brought into compliance with all applicable state and local grading, excavation and erosion/sediment control requirements.

Peak water demand: Is calculated using 1.4 gallons of water/ft² of cultivation area per month to maintain plants during the warmest summer months. This water data was calculated using the above averaged data as well as information gleaned from the Initial Statement of Water Diversion that was filed in June 2017 at the State Water Resources Control Board. This cultivation project averages between 8,000 to 16,000 gallons per month. The "Monthly Water Use" table below shows estimated water use being proposed throughout the grow season. This parcel is subject to a forbearance period of May 15 to October 15th. Water usage will continue to be monitored and recorded by use of in-line totalizing flow meters in accordance with applicable regulations.

Monthly Water Use Table:

There is no agricultural water use during the months of November-March

	<i>Cultivation C (10,000 SQ FT)</i>	<i>Plant Stage</i>
<i>April</i>	<i>8,000</i>	<i>YOUNG</i>
<i>May</i>	<i>16,000</i>	<i>veg</i>
<i>June</i>	<i>16,000</i>	<i>VEG</i>
<i>July</i>	<i>16,000</i>	<i>VEG</i>
<i>August</i>	<i>16,000</i>	<i>VEG</i>
<i>September</i>	<i>16,000</i>	<i>FLOWER</i>
<i>October</i>	<i>16,000</i>	<i>FLOWER/HARVEST</i>
<i>Total in gallons</i>	<i>96,000</i>	

Irrigation Methods: Irrigation is accomplished by use of drip irrigation as well as hand watering once weekly. The drip lines installed have been set on a timer the water delivery throughout the beds is monitored on a daily basis (flow meters and float valves are installed at the water bank) ensuring responsible water use. Mulch is carefully placed as a top dressing to optimize soil water retention.

Irrigation Runoff: The use of carefully administered hand watering minimizes the chance of any overwatering or residual discharge of irrigation solutions outside of the “targeted” root zone. In the unlikely event that residual discharge did occur, it would contact permeable soil on a nearly level ground surface surrounding the cultivation area and be rapidly absorbed at the point of contact; runoff of any irrigation solutions away from the point of ground contact is unlikely. Cultivation activities are limited to the immediate cultivation area and conducted so materials are kept confined. The ground surface within and around the cultivation area is formed and managed to prevent any movement of entrained constituents such as fine sediment, fertilizer or other organic particles beyond the cultivation area.

Watershed Protection: Cultivation Area B is 75’ from a Class III watercourse. The Cultivation Area on the subject parcel meet applicable setback requirements to watercourses, riparian zones or wetlands (see site plan). Natural vegetative buffers surrounding the cultivation area remain undisturbed; transport of any cultivation byproducts beyond the limits of the cultivation areas is unlikely. Watershed protection will be ensured by adherence to measures prescribed in the Water Resources Protection Plan being developed specifically for this parcel by Timberland Resource Consultants under Regional Water Quality Control Board WDR Order # R1-2015-0023 enrollment requirements. Included with this submittal is a signed copy of Appendix A, “Enrollment Notice of Intent”.

Once enrolled under R1-2015-0023, participants are required to engage in ongoing monitoring, reporting and maintenance including periodic site inspections and reviews of operational practices to ensure regulatory requirements related to the following listed items are being met:

<i>Site maintenance, erosion control, and drainage features</i>	<i>Stream crossing maintenance</i>
<i>Riparian and wetland protection and management</i>	<i>Spoils management</i>
<i>Water storage and use</i>	<i>Irrigation runoff</i>
<i>Fertilizers and soil amendments</i>	<i>Pesticides and herbicides</i>
<i>Petroleum products and other chemicals</i>	<i>Cultivation-related wastes</i>
<i>Refuse and human waste</i>	

Additionally, participants ensure that management measures and controls are effectively protecting water resources, and that any newly developing problems representing a water quality concern are identified and corrected quickly.

Fertilizers, Pesticides, and other Regulated products:

List and describe machinery and equipment used for cultivation and associated activities.

Water pump

Describe equipment service and maintenance; including where it is done (oil change, cleaning, etc.)

Equipment service/maintenance is done by qualified service providers at either Redway or Garberville.

List and describe petroleum products and automotive fluids used onsite.

Conventional 5 gallon gas cans

List and describe compressed gases, cleaners, solvents and sanitizers; indicate amounts normally stored and how/where they are stored. n/a

Fertilizers, Pesticides, other Regulated products: The fertilizers/amendments listed below are used at the start of the grow season; only quantities needed are purchased and brought to the site. Annual reporting of fertilizer/amendment use is required under RWQCB Order No. R1-2015-0023 and the data is provided on page 4, Appendix C (RWQCB Order No. R1-2015-0023).

Mixing of the products listed below takes place only within a small area near cultivation sites and the products are kept protected from accidental spillage or disturbance from wildlife while mixing takes place.

Dr. Earth – All Purpose Fertilizer 5-5-5

Dr. Earth – Bud and Bloom

Worm castings

Plant Therapy spray for foliar treatments if needed for pests

If soil amending is required following initial start-up, additional products from the list above will be obtained as needed for specific application. If there are left-over nutrients they are stored in the garage below the residence (on adjacent parcel 216-083-006).

The applicant acknowledges that the storage and/or use of certain materials in specified volumes and/or weights will be subject to regulation through Humboldt County Division of Environmental Health CUPA and may require: submittal of inventories for those materials, documentation of emergency and training procedures, maintenance of hazardous waste disposal records, obtaining an EPA generator ID number and be subject to site inspections.

Cultivation related wastes are sorted such that compostable materials are recycled or composted onsite (Near Cultivation Area B on parcel 216-083-006). Solid waste that is unsuitable for composting, is stored along with domestic garbage in conventional lid trash containers inside the garage on the adjacent parcel (refer to site plan 216-083-006) and hauled to an approved transfer station/disposal facility as needed. The applicant proposes to have a shipping container or shed placed at the cultivation sites for storage a garbage and other materials.

Human Waste: The subject parcel is developed with a residence served by a conventional septic system. Cultivation activities are only carried out by resident occupants and the restroom in the residence is easily accessed when needed (On the adjacent parcel to the south 216-083-006).

Cultivation: on the subject parcel is limited to one round of full term outdoor.

Monthly Activities

March/April: Begin garden site preparation and water line inspection, POD verify irrigation system efficiency etc.

April/May: Begin preparation of grow bags, condition soil, clones have been purchased.

May: Clones get transplanted by end of May

June: Being tended to regularly to ensure optimal health and growth rate. Organic nutrient feeding as needed, start tie/netting as needed, ongoing maintenance.

July: Caging and tying back, ongoing maintenance.

August - September: Tend to regularly to ensure optimal health and growth rate.

October/November: Initiate hand harvesting. Garden sites are cleaned up and prepared for winter. Water forbearance period ends.

Processing: Plants are harvested at peak ripeness and immediately transferred to dry in the Ag Barn.

Security: Access to the site is restricted by use of locking metal gates at two separate road locations.

The nature of this site is remote. The outdoor cultivation area is fully fenced with a locking gate. The owners of the property live on site.