

OPERATIONS PLAN

FULL PARDON FARMS LLC 216-083-006-000

APPLICATION COMPILED BY:



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Project Description: The applicant is seeking approval for a conditional use permit for an existing full-term light deprivation up to 10,000 square feet. Currently there are two full term outdoor cultivation sites. Site A labeled on the site plan measures approximately 6000 sqft including (3) $20 \times 100 \text{ sq ft}$ greenhouses and cultivation area B measures approximately 4000 sqft including (2) $20 \times 100 \text{ sq ft}$ greenhouses. The Applicant proposes to retain these two existing cultivation sites.

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 is approximately 137 acres, zoned AE-B-5(160); TPZ and Plan Designation-AG. It is accessed off of Bell Springs Road region of Humboldt County approximately 9.5 miles East of Garberville area or .2 miles west of Hydesville.

Topography/Landscape: The parcel resides on the south facing slope that T's from the East to West along the ridge that ranges from approximately 2300-2800 feet in elevation. The majority of the parcel is covered in native tree species with some small grass land areas. On the prominent ridge line There are two small clearings on existing open flats where the cultivation areas exist as well as existing flat for the residence. There are two seasonal creeks on either side of the ridge, neither one is being disturbed by cultivation.

Roads/Stream Crossings/Easements: Enter the parcel on the gravel road that travels along the top of the ridge. There are no stream crossing or easements on this parcel. Interior road conditions will be assessed in the development of a site -specific Water Resources Protection Plan (WRPP) enrollment #1B161473CHUM by Timberland Resource Consultants by the end of the year 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.

Utilities: A Honda 7000 watt generator is used for recharging the solar system which is located just north of the Garage near the residence on site. Used to serve the water pump (only used for amendment tanks) and the residence on site. The residence on site contains conventional septic system.

Building/Structures/Facilities: A 1600 sq ft residence built in 1990 is located on the highest point of the parcel along the prominent ridge as well as a garage with solar panels located just south of the residence. A 16x24 Ag Barn (built 1980) is used for drying and storage located in the SE corner of parcel

216-081-008 which has its separate driveway which breaks away from the ridge heading east at the 216-083-006 parcel boundary.

Surface Water Features: Seven unnamed water courses are located on the property, all which drain to Rancheria Creek which is a tributary to the East Branch of the South Fork River. A rain catchment pond labeled as POND B on the site plan resides on the East side of the slope near the top of the ridge.

Water Sources Serving Property: POND B on the site plan resides on the East side of the slope near the top of the ridge; it measures 150x60x10 and holds approximately 400,000 gallons.

The water is pumped from the pond to two 5,000 gallon tanks and four 2,500 gallon tanks at the top of the hill.

Water Storage: There are 20,000 gallons of water storage on the parcel. All existing, two 5,000 gallon tanks and four 2,500 gallon tanks.

Cultivation Areas: The current cultivation includes a 6,000 square foot area including (3) 20×100 light deprivation greenhouses located on the landing west to the residence and a 4,000 square foot area (2) 20×100 light deprivation greenhouses south east of the residence. The light deprivation greenhouses do not use lights during the season of May-October only the methods of tarp pulling.

Proposed cultivation areas and surrounding ground surfaces will be evaluated in the development of a site-specific Water Resources Protection Plan (WRPP) prepared by Timberland Resource Consultants. 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 cultivation project averages between 6,000 to 14,000 gallons per month. The "Monthly Water Use" table below shows **estimated water use** being **proposed** throughout the grow season. This water data was calculated using the above averaged data as well as information gleened from the Intial Statement of Water Diversion that was filed in June 2017 at the State Water Resources Control Board. 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-April**

	Cultivation A (6,000ft²)	Cultivation B (4,000 ft²)	Plant Stage	Total Gallons
May	1,000	2,500	YOUNG	8,000
June	3,000	6,500	VEG	9,500
July	3,000	8,500	VEG	11,500
August	4,000	9,500	VEG/harvest	13,500
September	4,000	10,500	VEG/FLWR	14,500
October	1,500	3,000	FLWR/harvest	4,500
Total in gallons	16,550	40,500		57,050

Irrigation Methods: Irrigation is accomplished by hand watering every other day or as needed. (flow meters and float valves will be installed 2019 at the water banks) 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: The Cultivation Areas 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 which has been developed specifically for this parcel by Timberland Resource Consultants under Regional Water Quality Control Board WDR Order # R1-2015-0023 enrollment requirements. A copy of this WRPP enrolment ID# is attached with this submittal.

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:

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

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, 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

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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.

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.

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

Honda 7,000 watt generator, water pump, and rototiller.

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 are located in the garage below the residence.

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

Cultivation related wastes are sorted such that compostable materials are recycled or composted onsite near Cultivation Area C. Solid waste that is unsuitable for composting, is stored along with domestic garbage in conventional lid trash containers inside the garage and hauled to an approved transfer station/disposal facility as needed. The applicant proposes to have a shipping container placed at each of 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.

Monthly Activities

March/April: Begin garden site preparation and water line inspection. Water storage is approaching capacity before forbearance period begins.

April/May: Begin preparation of raised beds, condition soil, clones have been purchased and are transferred to beds at the beginning of May.

May: Clones are transplanted into the beds by end of May.

June: Plants are 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. Start tarp pulling.

August - September: tend to regularly to ensure optimal health and growth rate .First Harvest initated and re-plant beds for second harvest.

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

Processing: Plants are harvested at peak ripeness and immediately transferred to Ag Barn to dry. Processing is proposed to be done off site.

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.