

Addendum 210-191-050 #11208

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Hwy 36 Homestead LLC, Eastside is a sole member, for profit, entity designed to conduct activities within the State of California.

The Project Sponsor is purposing 17,230 sq. ft. of flowering cultivation area and purposed 3,000sq.ft. nursery/propagation area in the form of (1) outdoor cultivation areas located on Parcel No. 210-191-050 totaling 24.04 acres. The project currently features a 960sq.ft agricultural building that is administration area, propagation and drying area. There are (2) existing sheds that are 14 sq.ft. One housing nutrients, fertilizers and pesticides and other used for fuel storage. There is purposed agriculture 960 sq.ft. to provide additional space for drying and propagating.

The site will be supported by PG&E and is applying for power drop currently.

Phase 1(2020-21)

- Obtain Land Use approval.
- Grading and building out new greenhouses.
- Drilling for a well.

Phase 2 (2021-22)

- Building purposed agriculture building.
- Replacing culvert in pond area to satisfy CDFW requirements.
- Installing additional water storage to fulfill water forbearance period if well is not sufficient.

Project Overview:

The Project concerns Parcel No. 210-191-050 in Bridgeville, California that is seeking permitting for a pre-existing outdoor medical cannabis cultivation with consideration of the phased approach to development. The project purposed would feature (1) cultivation area totaling 17,230 sq.ft of flowering area and purposed 3,000sq.ft of propagation area totaling 21,230 sq. ft (Attachment 1 for explanation as to why the nursery space is being purposed). The property falls within the allowable zoning and property specification requirements of the local jurisdiction's commercial cannabis approval program.

Location Description:

The Purposed Project would occur on legal Parcel No. 210-191-050, in the northwest and southwest quarters of the northwest quarter Section 8, Township 1 North, Range 5 East, Humboldt Meridian.

Zoning:

The property features zoning FR and the following characteristics:

- GIS: 24.05 acres
- Coastal Zone: Outside
- 100 year Flood Zone:Outside
- Alquist-Priolo Fault Hazard Zone:Outside
- FEMA FIRM Flood Rating &Panel Number: Not Applicable
- Slope:>15% in most cultivation area
- Relative Slope Stability (Per General Plan Geologic maps): High Instability

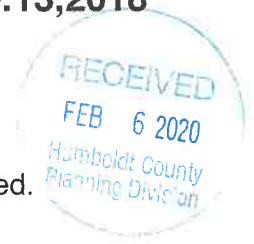
Soil Rating:

As per Humboldt County Ordinance No. 2544, because the project is pre-existing, no prime agricultural soil rating requirements pertains.

Attachment 1: Purposed 3,000sq.ft. Nursery

The property owner/operator is asking for additional nursery/propagation space because there is a need to have larger plants to transplant for the second seasonal planting. The operator requires the plants to be planted not in one gallon containers, but 5 gallon containers to obtain the correct size of plants for the second planting due to the seasonal light having shorter hours towards the end of summer. The shorter hours from approximately August 1 on "trigger" the plants to flower and there is less time during this part of the season to "veg" the plants. This results in more space needed for the second planting than the first planting (which requires only 1 gallon containers used for first planting). By using the natural light and not supplemental light to extend the season, the operator requires larger plants for the second planting. The operator also uses a high number of plants create the canopy. This also requires more propagation space.

Response to Planning Departments Review Response to Nov.13,2018 Letter



1. Soils Report-R-2 soils report with A.M. Baird in process.
2. Arch study done and submitted to county.
3. Delineation for property requested on 7-27-19 to Trans Terra Consulting completed. Submittal to Humboldt County Planning for Army Corp Engineers for approval?
4. Operation Plan Update
 - A. The property owner has applied for a well permit to try for a well. If this scenario will satisfy the water usage for both farms if we get water 5 gallons a minute or better.
 - B. If the well doesn't work then the property owner will install rain water storage containers to and/or water holding tanks to satisfy the forbearance period. (required gallons)
5. We are no longer using the pond water for irrigation. Neighboring property owner request not necessary.
6. LSA has been submitted and paid for. Waiting for rough draft from CDFW.
7. Cultivation Operations plan
 - A. Employees will use their own transportation and no one will live onsite.
 - B. Onsite parking to be marked on map
 - C. Anticipated trips per day 1-2 vehicles
 - D. Soils management plan to be developed by Pacific Water Shed-No one will be living on the property. Employees will be using the cabin on parcel # 210-191-049 that has pg&e power, permitted septic facilities, water filtration systems for drinking water.
 - The current building (ag exempt) will be used for drying and vegging.
8. Owner will create a turn out for Cal-Fire and access for PG&E (See map)
9. Processing to be handled off site in an approved facility.
10. No generators will be used and no fuel will be stored onsite. Property owner is applying for PG&E to do a power drop there.
11. Need to clarify what space is used for propagation.
12. Addressed in #7.
13. LSA changes have been addressed and resubmitted to
14. Removal of water bladder.
15. Sewage problems will be no longer a problem for day time employees. There will be a port-a-potty serviced by Six Rivers B&B at the site. The cabin on adjacent property will be utilized
- 210-191-049 has a permitted septic system that can be used.
16. Eliminated the water bladder.

Operations Manual Addendum 2-6-2020

East Side Hwy36Homestead, LLC



*Hwy 36 Homestead, LLC to replace where ever Tree Pham is used

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Executive Summary

Hwy36Homestead, LLC is a sole member, for profit, entity designed to conduct agricultural activities within the State of California.

The Project Sponsor is proposing 17,230 sq. ft. of cultivation in the for of 1 outdoor cultivation area located on Parcel No. 210-191-050 totaling 24.04 acres. There is a 120sq. ft. fertilizer and pesticide shed used for storing products when not in use. There is a 120 sq. ft. shed used for fuel and equipment storage. The Project site currently features a 960 sq. ft. agricultural building that will be used for propagation and drying. PG&E power will support the Project.

Water is to be sourced from a well that is going to be drilled at APN#210-191-049 or water will be drafted during the winter months from supporting neighboring property at APN# 210-191-049. Same property owners have both properties. The Currently on site there is (2) 1,500 gallon water tanks. The one (1) 20,000 gallon bladder will be removed. Project needs will be 170,000 gallons water storage or use water during season from a well to be drilled.

The Property Owners have initiated the Wast Discharge (WWD) enrollments to facilitate compliance with the North Coast Regional Water Quality Control Board (NCRWQCB). The Initial Statement of Water Diversion and Use (ISDU) has been filed to support the applicant's rights to water diversion/use.

An LSA has been filed for California Department of Fish and Game (CDFW) for replacement of the culvert to 100 year standards.

Project timeline (2020)

Phase 1

- Well to be drilled and determined if water supply is enough for forbearance period for project.
- Install 2-3 more 5,000 gallon water tanks to support project and 2 mixer tanks for fertilizers.
- Develop hoopouses structures.
- Develop turn-a-round and clear new road/parking area as designated on map.
- Put in PG&E power to Ag exempt building.

Phase 2 (2021)

- If well is not sufficient, enough water storage will be added to support the project in 5,000 gallon tanks.

Project Overview

The Project concerns Parcel No. 210-191-050 in Bridgeville, California that is seeking permitting for a pre-existing outdoor medical cannabis cultivation with the phased approach to development. The Project proposal would feature one cultivation area totaling 19,500 sq ft (16,800 sq feet flower space and 2,700 sq.ft. vegging space). The request for additional vegging space is requested because the size of the plants for the second round need to be larger at lease 3 feet in diameter (covers are pulled over hoopouses and it is necessary for the replacement plants to be larger in size or they will not cover the canopy of the garden before going to flower. Supplemental light is not used). Applicant seeks approval if 19,500sq ft. of cultivation. The property falls within the allowable zoning and property specification requirements of the local jurisdiction's commercial cannabis approval program.

Location Description

The proposed Project would occur on legal parcel No. 210-191-050, in the northwest and southwest quarters of the northwest quarter Section 8, Township 1 North, Range 5East, Humboldt Meridian.

Zoning

The property features zoning FR and the following characteristics:

- GIS acres:24.05
- Costal Zone:outside
- 100 Year flood zone:outside
- Alquist-Priolo Fault Hazard zone:outside
- FEMA FIRM Flood Rating & Panel Number: Not Applicable.
- Slope:>15% in most cultivation areas.
- Relative Slope Stability (Per General Plan Geologic maps): High Instability

Soil Ratings

As per Humboldt County's Ordinance No. 2544, because the project is pre-existing, no prime agricultural soil rating requirement pertain.

Moreno, Elizabeth

From: Robert Neely <hwy36homestead@gmail.com>
Sent: Thursday, March 05, 2020 9:06 AM
To: Moreno, Elizabeth
Subject: Re: APPS 11208

Hi Elizabeth,

Thanks for you patience on this.

2 Full time employees: that will not be living on premises. The employees will utilize facilities on parcel 210-191-049. There will be 2 cycles.

There will be no lights used because we plant after May 20th when the light has turned to longer days.

There will be no fans used in greenhouses. We take the poly covers off during summer June10-Oct10. We do this because we get less disease on the plants and have less need for pesticides.

Water usage will be equivelant because we are implementing watering drip systems which are more efficient then hand-watering which happened in the past. I think it should be 50% more efficient than hand watering. Even if we increase number of plants they are much smaller than the past larger full-term monster size plants.

I just wanted to say that because of my changes to site I don't think that we are going to be impacting the site in a negative way. These are the improved aspects to our business plan. The number of employees will be 2 onsite the majority of the season. There will be 4 employees only during harvest and planting which occurs in just 2-3 days. There will be 2 harvests and 2 plantings per season. The product is dried onsite in the Ag building and some product is dried off site on other supporting property 210-191-049. There will be no additional people at this site. The old owner was living onsite with 3 other people so the actual impacts will be less than in the past. They were also using generators for power. We are not using generators. PG&E power upgrade is in the works and should be accomplished by the end of summer. Old owners trimmed onsite and we are trimming off site in an approved facility in town. Also we are proposing to move garden even further from pond to 100 ft' not 70' which we will utilize the 30' addition for satisfy Cal-fire and create a turnaround for emergencies.

Please confirm meeting tomorrow at 10:00. We can meet at mile marker 32 at 9:45 and we can lead way to cabin.

Thanks,

Aiyana Neely
707-672-941

On Tue, Feb 18, 2020 at 9:33 AM Moreno, Elizabeth <EMoreno@co.humboldt.ca.us> wrote:

Hi Aiyana,

I talked to my supervisor regarding the changes being proposed on apps 11208. We need further information, since what is being proposed is not within the CEQA base line condition that the Mitigated Negative Declaration based its findings on for the Ordinance 1.0.

Will the greenhouses have fans ?

Will the greenhouses have lights ?

Moreno, Elizabeth

From: Robert Neely <hwy36homestead@gmail.com>
Sent: Tuesday, May 19, 2020 8:33 AM
To: Moreno, Elizabeth
Subject: Purposed water storage
Attachments: SIUR WESTEAST UPDATES 5-7-20.pdf; IMG_8186.jpg; IMG_8188.jpg

Hi Elizabeth,

Here is what I sent in to the State Water Board in regards to this spring/water usage for the forbearance period:

Calculated 8.24 gallons per sq.ft. of canopy

Property 210-191-049 (App#12572) needs in total 82,400gallons for the forbearance period.

If the well does not produce I'm purposing adding (19) 5,000gallon water tanks as shown on the Purposed Map. I added a picture in attachments.

Property 210-191-050 (App#11208) needs in total 142,005 gallons of water for the forbearance period.

If the well does not produce I'm purposing adding (46) 5,000 gallon water tanks for the forbearance period. This amounts to 230,000 gallons of water so I don't think I'll need that much but at minimum I need (29) 5,000gallon water tanks.

Attached is the water estimator chart labeled SIUR West:East that was sent into State Water Board.

Attached is picture of purposed map for App#12572 with water tanks circled in red.

Attached is picture of purposed map for App#11208 with water tanks circled in red.

Thanks, Aiyana Nely
707-672-9419

Pre-Liminary Cultivation & Operations Plan:

Subject to change based upon the integration of the Water Resource Protection Plan (WRPP) provided by Pacific Watershed Associates and the Lake & Streambed Alteration Agreement issued by the California Department of Fish and Wildlife.

Cultivation Plan

The Cultivation Plan adheres to robust standards promulgated under the DPR and regulated under the CDFA, and in accordance with DCA's consumer standards maintained by the Department of Public Health (DPH).

In preparation for future certification related to organically produced product, the Cultivation Plan also follows National Organic Program (NOP) standards. The input guidelines established by the DPR are in accordance with certification regarding organically produced product requirements and follow a whole-farm BMP plan for management of land, crops, and end products.

Summary

The Project proposes 17,230 sq. ft. of Type 3 pre-existing outdoor cultivation in the form of three (3) garden areas on 24.05 acres of FR zoning that would be serviced entirely by natural light with, the exception of, supplemental light for nursery operations only.

Water for the Project would be sourced from one (1) 2,500-gallon and two (2) 1,200-gallon water tanks, and one (1) 20,000-gallon bladder that are supplied by the onstream pond. A WRPP will be available upon completion for further information regarding site-specific conditions, mitigation measures, and remediation efforts.

Cultivation Schedule

The following table details the annual cultivation schedule, comprised of three (3) harvests per year, with breakdown by area. Water figures are indicated in gallons.

Area	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
HH 1	Cover	Cover	Cover	Cover	Veg	Veg/Blm	Blm	Blm/Veg	Blm	Blm	Cover	Cover
HH 2	Cover	Cover	Cover	Cover	Veg	Veg/Blm	Blm	Blm/Veg	Blm	Blm	Cover	Cover
Outdoor	Cover	Cover	Cover	Cover	Cover	Veg	Veg	Veg/Blm	Blm	Blm	Cover	Cover
Water	0	0	0	0	400	12000	20000	24000	20000	1500	0	0

*Water use as reported in the self-reporting attachment Appendix C or Monitoring & Reporting Form (MRP) of the WWD Enrollment.

Winterization Plan

Prepared for Tree Pharm, LLC I by AgDynamix, LLC (June. 2017)

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see revised pg. 12 + 28

Project Overview

The Project concerns Parcel No. 210-191-050 in Dinsmore, California that is seeking permitting for a pre-existing outdoor medical cannabis cultivation with consideration of the phased approach to development. The Project proposal would feature three (3) cultivation areas totaling just under 17,230 sq. ft. Cultivation and processing activities would occur on the south central portion of the Parcel.

Summary

The Project parcel is zoned FR, which falls within the allowable zoning specified by the local authority. The Sponsor seeks permit approval for 17,230 sq. ft. of outdoor cultivation that is pre-existing, is supported by evidence, and involves natural light for cultivation and supplemental light for nursery only.

Location Description

The proposed Project would occur on legal Parcel No. 210-191-050, in the northwest and southwest quarters of the northwest quarter Section 8, Township 1 North, Range 5 East, Humboldt Meridian.

The Project features three (3) cultivation areas comprised of one (1) 9,750 sq. ft. outdoor garden, one (1) 5,480 sq. ft. outdoor garden, and one (1) 2,000 sq. ft. outdoor garden.

Applicant seeks approval for 17,230 sq. ft. of cultivation. The property falls within the allowable zoning and property specification requirements of the local jurisdiction's commercial cannabis approval program.

Zoning

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Prepared for Tree Pharm, LLC I by AgDynamix, LLC (June. 2017)

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Winterization Plan

Prepared for Tree Pharm, LLC I by AgDynamix, LLC (June. 2017)

During the fallow months, exposed ground would be cropped with green cover and native vegetation seed to protect against erosion and denitrification of the soil. Green manures would be incorporated into the native soils to enhance productivity during the forthcoming planting season.

Water Resources

Water for the proposed cultivation Project would be sourced from one (1) 2,500 gallon and two (2) 1,200 gallon water tanks, and one (1) 20,000 gallon bladder that are supplied by the onstream pond.

To mitigate runoff from cultivation activities, high-retention soil mediums and special irrigation techniques would be employed.

Irrigation Plan

For most of the season, crop production would be directly irrigated from three (3) onsite storage tanks. If approved, the Project has plans for water reduction irrigation systems.

Irrigation System

Applicant is using a drip circle irrigation system.

Emergency Water Plan

A WRPP has been filed by PWA. There will be adequate tank storage to support the cultivation activities for forbearance periods from May through October.

In the event of a water emergency, the proposed Project currently features adequate water storage to supply the cultivation activities from onstream pond. Existing and future water tank development is noted on the site plan (see *Site Plan/WRPP Map*).

Operational Plan

The Operational Plan covers many aspects of the business, including location, organization, and a description of the Project's business sponsor that includes its mission, vision, and values. It also includes a description of what is produced by the Project, including sales and marketing efforts.

Summary

The Operational Plan details use of the organization's resources in pursuit of the strategic plan. It prescribes specific activities and events to be undertaken to implement strategies. It is a plan for the day-to-day management of the organization (encompassing a one-year period). An operational plan should not be formulated without reference to a strategic plan. Operational plans may evolve from year to year with business growth. The chief executive, lead staff, and third parties of or for the organization often produce the Operational Plan.

The products produced by the Project would have the primary designated use of the treatment of patients with varying ailments. Medical cannabis products would be distributed to qualified medical cannabis consumers via wholesale outlets and retail dispensary locations.

Business Organization

Tree Pharm, LLC. is a sole member Limited Liability Company (LLC) operating under entity number 201629510378 that features one member-manager. The member-manager is responsible for delegating primary activities pertinent to the organization's daily and future management.

Management Team

Cody MacDonald, Chief Executive Officer.

Business Description

The primary goal of Tree Pharm, LLC. is, within the State of California, to conduct agricultural activities and produce specialty agricultural products.

Mission

Tree Pharm, LLC. is a for-profit entity with the mission of producing high-grade specialty cannabis agricultural products to support the medical cannabis supply chain for California-based retail dispensary outlets.

Vision

Tree Pharm, LLC. adheres to a sustainable and homestead-driven, integrative farming model that includes standards related to organically produced crops and onsite agricultural resource sustenance. The company's model integrates sustainable living and production principles with cannabis cultivation.

Values

Tree Pharm, LLC. values the need for prudent land management strategy, social equity, and the quality production of cannabis to supply medical consumers and the treatment of their conditions. The company is committed to operating within full compliance of local, County, and State regulations.

Prepared for Tree Pharm, LLC | by AgDynamix, LLC (June. 2017)

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Products

Tree Pharm, LLC. would produce specialty agricultural cannabis and nursery stock to support the onsite cultivation of high-grade organically produced cannabis flower products that are tested and assured for quality. Cultivation byproducts of additional value would be sold to permitted manufacturers (for the processing of extracts, concentrates, and topical products).

The primary designated use of the raw medical cannabis (flower) produced would be the treatment of patients with varying ailments. Premium-grade medical cannabis can be consumed via multiple methods, including inhalation, ingestion, and dermal (topical) applications. Cannabis has proven to deliver positive efficacy for myriad ailments, conditions, and symptoms. Research is underway regarding additional benefits of medical cannabis.

Sales & Marketing

Tree Pharm, LLC's product would be distributed to medical cannabis consumers via wholesale outlets and retail dispensary locations and ancillary marketplaces. The quality, testing thresholds, and branding would target consumers who lead a Lifestyle of Health and Sustainability (LOHAS) and who prefer premium organically produced medicine.

Chain of Custody

Tree Pharm, LLC. adheres to a robust system of chain of custody for recordkeeping and sourcing potential contamination of seed/nursery product, flower product, trim, or value-added byproducts. This system would serve to verify responsibility for and liability of products during cultivation, processing, distribution, and wholesale/retail sales.

Packaging

After testing and processing, products would be packaged per quality control standards and in tamper-proof packaging that does not appeal to minors. Products packaged in larger volumes would be distributed directly to consumers and retail outlets. Individual consumer labelling may be applied at the distributor or retailer level, after transfer of ownership in the chain of custody. If the business chooses to protect its branding through the Agricultural Commissioner, products would be individually packaged and labelled within the County of origin.

Distribution

Tree Pharm, LLC. will secure trading outlets for its products through existing local distribution networks. These distribution networks service retail dispensary outlets that seek licensure within their respective jurisdictions, as well as the State licensing platform under the CDFA. The established patient base has created a demand and fulfills the need for many medical cannabis products from multiple licensed suppliers within the State of California.

Track and Trace Standards

Article 7.5, § 19335 (a), *Unique Identifier and Track and Trace Program*: "The CDFA, in consultation with the BMCR, shall establish a track and trace program for reporting the movement of medical marijuana items throughout the distribution chain that utilizes a unique identifier pursuant to § 11362.777 of the

Health and Safety Code (HSC), secure packaging, and is capable of providing information that captures, at a minimum, the following:

- (1) The licensee receiving the product.
- (2) The transaction date.
- (3) The cultivator from which the product originates, including the associated unique identifier (pursuant to § 11362.777 of the HSC).
- (b) (1) The Department of Food and Agriculture shall create a database containing the shipping manifests which shall include, but not be limited to, the following information:
 - (A) The quantity (or weight) and variety of products shipped.
 - (B) The estimated times of departure and arrival.
 - (C) The quantity (or weight) and variety of products received.
 - (D) The actual time of departure and arrival.
 - (E) A categorization of the product.
 - (F) The license number and the unique identifier pursuant to § 11362.777 of the HSC issued by the licensing authority for all licensees involved in the shipping process, including cultivators, transporters, distributors, and dispensaries.”

Transportation

All products would be transported through either the permitted cultivator to processing or distribution and/or via a licensed transporter to trading partners that are authorized to distribute cannabis products to end consumers (when applicable). These transporters would be responsible for adhering to guidelines that involve (but are not limited to) permitting, weights and measures, packaging/packing/labeling, verification of packing and freight volumes, and liability insurance that covers product loss resulting from unintentional diversion or emergency.

Transporters would be responsible for fulfilling contractual deadlines and ensuring delivery of products in a timely fashion to maintain positive standing with trading partners and protect the quality of a product that features a limited shelf life.

SB-643, Chapter 719, § 19302.1 (d): “The DCA shall have the sole authority to create, issue, renew, discipline, suspend, or revoke licenses for the transportation, storage unrelated to manufacturing activities, distribution, and sale of medical marijuana within the State and to collect fees in connection with activities the BMCR regulates. The bureau may create licenses in addition to those identified in this chapter that the bureau deems necessary to effectuate its duties under this chapter.”

Processing Plan

The Processing Plan covers many aspects of the end stage cultivation workflow employed by the business to harvest, dry, trim, cure, package, and assure the quality of medical cannabis products. Quality assurance efforts include sanitation, dust control, and environmental standards necessary for optimal processing.

Background

As promulgated under various regulatory agencies, including but not limited to the Labor Commissioner (LC) and Wage and Hour Division (WHD), Employment Development Department (EDD), the Agricultural Labor Relations Board (ALRB), United States Department of Agriculture (USDA), the Food and Drug Administration (FDA), California Department of Food and Agriculture (CDFA), and are responsible for varying aspects of government labor laws, quality control, minimum wage and hours laws, administrative responsibilities, and health and safety regulations that govern processing and day labor activities related to Agricultural industries.

Summary

Applicant proposes to convert existing agricultural building into a commercial processing facility.

Cultivation activities undergo a common process flow that involves cultivation, to harvest, drying, to testing, grading/sorting, curing, to testing, packaging, to testing again (distributor level), and end sales. This is in efforts to ensure robust quality control, the business would employ stringent grading and sorting of medical cannabis product during harvest to eliminate any contaminated product from end supply.

Administrative

Administrative elements of the Project include payroll, recording and reporting, chain of custody, safety procedures and protocols, product safety materials, labor and subcontractor issues, and quality assurance/control of product.

Labor Management

The primary organization currently responsible for the recordkeeping of employees (both seasonal and permanent) would be Tree Pharm, LLC. All records maintained by Tree Pharm, LLC. would be made available upon request.

The organization has considered payroll options for peak times of the season during which employment periods would be up to several months in duration (particularly during the harvesting, processing, and packaging stages of cultivation). An outside entity may be responsible for soliciting, recruiting, and hiring employees.

The designated entity is responsible for ensuring property, business, and workplace compliance under the guidelines of the following departments:

- Bureau of Medical Marijuana Regulation (BMCR).
- California Department of Food & Agriculture (CDFA).
- County Agriculture Commissioner (CAC).
- County Planning Department (CPD)/Community Planning (CP)/Development Department (DD).

Prepared for Tree Pharm, LLC | by AgDynamix, LLC (June. 2017)

- Department of Industrial Relations (DIR).
- Department of Labor, Wage and Hour Division (DL-WHD).
- Department of Pesticide Regulation (DPR).
- National & California Agricultural Labor Relations Board (NALRB/CALRB).
- Occupational Safety and Health Administration (OSHA).
- U.S. Department of Labor (US-DOL).

Recording & Reporting

All employee records for hours worked and reported would be kept onsite or via a payroll recordkeeping center and submitted to the managing payroll department to ensure timely reporting. Requests for review of payroll records would be the sole responsibility of the managing human resources agent (upon request and under certain lawful circumstances).

Quality Assurance & Control of Product

Quality assurance efforts encompass sanitation, climate control, dust control, and a variety of environmental standards. Quality control measures include monitoring, testing, harvesting, drying, curing, grading, sorting, packaging, secure storage, and distribution procedures.

In 2011, the Food and Drug Administration tasked the U.S. Department of Agriculture (USDA) to co-create with the U.S. Department of Health and Human Services (USDHHS) and the Center for Food Safety and Applied Nutrition (CFSAN) a program to implement Good Agricultural Practices (GAPs) and Good Handling Practices (GHPs). The goal was to mitigate food safety hazards and set standards and management regulations for processing facilities to ensure quality and consumer safety of agricultural products when handled in processing environments.

Found in the April 2011 *Guide to Minimize Microbial Food and Safety Hazards for Fresh Fruit and Vegetables* (authored by the USDA, USDHHS, and CFSAN) is discussion about the fundamental procedures that should be developed and implemented. This document features a list of principles applied to the workplace in efforts to meet these standards and is as follows:

- Accountability for product quality.
- Controls for workplace sanitation.
- Employee hygiene.
- Minimization of microbial exposures.
- Operating procedures.
- Packaging procedures and protocols.

Chain of Custody

Agricultural businesses must adhere to a rigorous chain of custody system for product management and the identification of contamination in all raw and finished products.

Monitoring

Pre/post-harvest workflow would be monitored on a predetermined schedule and involve documentation of the condition of the product during its active stage of monitoring.

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Harvesting

During harvest, a labor crew would be required to assist with light physical labor, including walking, crouching, lifting, and some climbing.

Testing Procedure

All product testing would be conducted by an approved (certified) third-party laboratory. This would encompass testing for potency and purity, including the presence of pesticides, fungicides, and harmful micro biologics.

Drying/Curing

Product would be harvested at maturity and dried and cured in a climate-controlled environment. The primary equipment used would include dehumidifiers, fans, and heaters.

Grading/Sorting

Products would be graded based on testing results, maturity, and specific intended use (flower, manufacturing of extracts, concentrates, topical products, etc.)

Processing

Product would be harvested, trimmed, dried, and cured in a manner best suited to the specific environmental factors of the crop. This would include both visual inspections by master cultivators and data collection and analysis (via automated sensors).

Packaging

Packaging would adhere to the guidelines for package type, quantity/weights, warning labels, and stamping procedures.

Health & Safety

The first response emergency contact phone number is 9-1-1. Hospitals are Redwood Memorial Hospital at 707-725-3361 (Fortuna) and St. Joseph Hospital at 707-445-8121 (Eureka). The American Association of Poison Control Centers (AAPCC) can be reached at 800-222-1222.

Job Hazard Analysis

Labor duties would vary throughout the harvesting, drying, processing, and packaging stages of the operation. With each task, an analysis would be conducted to identify potential hazards associated with a task, including weather conditions, the physical aptitude of employees, tools utilized, and potential exposure to chemicals and other substances. Identification of these hazards is intended to mitigate potential job hazards and help ensure employee adherence to safety practices.

Injury Illness Prevention Plan

It is required by the DIR that every employer shall establish, implement, and maintain an effective Injury and Illness Prevention Plan (IIPP).

Components of an IIPP include:

- Employee compliance with safe and healthy work practices.

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- Investigation of injuries and/or illnesses.
- Procedures for correction of unsafe/unhealthy conditions, work practices, and/or procedures.
- Procedures to identify and evaluate workplace hazards.
- Responsible person(s) and contact information.
- Safety training.
- System for communication with employees.
- Thorough safety program recordkeeping and document retention practices.

Heat Illness Prevention Plan

Written protocols regarding heat illness prevention would be available to employers, managers, supervisors, and employees regarding how to prevent and handle heat illness incidents.

To prevent heat illness to employees in the field, several factors must be considered:

- Ambient temperature (measured via thermometer or weather report).
- Crew size.
- Excessive clothing.
- Other relevant exposures.
- Presence of personal protective equipment or additional sources of heat.
- Work shift duration.

The following heat illness factors would be considered:

- Accessibility of drinking water.
- Accessibility of shade (via protective structures).
- Periodic rest breaks.
- Reminders to employees to remain hydrated.

Hazard Communication Policies

Hazard communication is important to ensure the safety of all onsite employees, contractors, and subcontractors. Potential and known hazards would be made clear prior to conducting tasks and activities. Implementing this procedure is important to ensure that employees, contractors, and subcontractors are informed about the relevant risks associated with certain onsite tasks and the reduction of liabilities against the employer for improper use of equipment, machinery, and tools.

Emergency Procedures

Emergency procedures include the availability of eye washing stations and detailed procedures for dealing with chemical spills. In the event of an emergency, certain protocols would be developed and followed regarding fire evacuation plans, earthquake safety, and other emergency scenarios.

Chemical Handling

Any input products used onsite would be accompanied by MSDS and Chemical Inventory Lists that would be available to inspectors and employees and maintained onsite.

In the event of emergency spills, Call 9-1-1 and then report to the Office of Environmental Safety (OES) and California State Warning Center (CSWC) at 800-852-7550 or 916-845-8911 and identify proper steps to isolate the incident and cleanup.

Eye Washing Station

Often, chemicals used onsite provide MSDS sheets that indicate the need for applicators to utilize an eye washing station after exposure. The eye washing station must be positioned within 200' of the cultivation area and any areas where chemicals, fertilizers, or pesticides would be used or administered for various applications.

Employee Accident Policies

An investigation would be conducted to determine next steps.

The company adheres to protocols for employee accident reporting. The manager is responsible for documenting any onsite incidents using *Form 5020*, including:

- Address of accident/event site.
- Description of accident/event and if the accident scene/instrumentation has been altered.
- Employer's name, address, and telephone number.
- Law enforcement agencies present at the accident/event site.
- Location of medical treatment.
- Name and address of injured employee(s).
- Name and job title of reporting party.
- Name of contact person at accident/event site.
- Nature of injuries.
- Time and date of accident/event.

Accidents need to be reported immediately to Cal/OSHA in Redding at 530-224-4743.

Contact the business' medical provider, the employee's designated medical provider, or 9-1-1, depending on the severity of the incident. Follow up with contact to the California Division of Workers' Compensation (CDWC).

Personal Protective Equipment Policies

Application of pesticides and fungicides requires personal protective equipment, including respirators, Tyvek suits, and gloves. It is the applicator's responsibility to ensure safety in the field. The farm manager is responsible for furnishing, applying, and informing of the appropriate uses associated with such products.

Applicators are required to acquire an Operator ID through the Agriculture Commissioner via the Pesticide Handling Training Program (PHTP). This would involve training applicators about labels, cautions, and recommended Personal Protective Equipment (PPE). Pesticide PPE would be stored onsite and separately from fertilizers, pesticides, and fungicides. Restricted Entry Intervals (REI) would be imposed and posted after application of chemicals to prevent exposures.

Additional PPE provided onsite for any processing labor would include access to gloves and dust masks by employees during drying, processing, and packaging.

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It is the responsibility of managers/supervisors to ensure that PPE policies are followed during appropriate working conditions. In the event of product application by an employee, the applicator must be designated an operator ID and is required to employ the proper PPE during application, as well as abide by label warnings in the event of exposure, poisoning, or a spill.

Processors may be required by State law to employ PPE equipment for the duration of their shifts to ensure no exposure to and/or contamination from a product.

All laborers must be made aware of REI and tangible notification of the recommended REI after the application of pesticides, fungicides, and other chemical applications.

Occupancy & Structural Guidelines

The general environments in which laborers would work include the field and within the proposed processing building. The environments in which any agricultural activity would occur would follow all guidelines (per agricultural and labor oversight agencies). The facility would need to meet commercial building standards in accordance with California Building Codes and would be made compliant with the American with Disabilities Act (ADA) and Architectural Barriers Act (ABA).

Any housings, buildings, and structures would be subject to California Building Code (CBC), including possible permitting requirements, inspections, and certificate(s) of occupancy. Additionally, specific exemptions exist that pertain to agricultural standards under the Occupational Safety and Health Administration (OSHA) and in conformance with the Occupational Safety and Health Guidelines (OSHG) (unless the Project meets certain exemptions, such as being a family-owned and operated business, does not offer temporary labor housing, or employs fewer than 10 employees at any given time). In other such cases, the site would need to comply with OSHA Guidelines pertaining to agricultural employment.

Project Processing Environment

The Site Plan includes a personal residence that is not extended to employees. Applicant proposes to convert existing agricultural building into a commercial processing facility to support trimming, drying, curing, grading, sorting, and storage activities. It is expected that structures for this project would support a maximum of fifteen (15) people during peak processing activities. Applicant may propose additional structural development to accommodate enhanced operational needs.

Housing

No housing will be provided to employees. However, there is a trailer on site for personal use only.

Any housing provided to employees for this Project will be subject to CCR regulations found in the *Source Guide for Federal & State Requirement for Employees and Migrant Housing*.

Notification of Occupancy & Terms

As per the DIR and the US-DOL, all notices and labor postings would be provided and visible to all onsite employees. Any notification of occupancy status and terms of employee occupancy would be posted in compliance with all local, State, and Federal laws governing agricultural employers under the following regulatory bodies and regulations:

- California Agricultural Labor Relations Act (CALRA).
- California Occupational Safety & Health Administration (Cal/OSHA).

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- Department of Industrial Relations (DIR).
- State and National Agricultural Labor Relations Board (CLRB & NLRB).
- U.S. Department of Labor (US-DOL).

Maintenance of Sanitary Facility

To help ensure the quality of finished product, a clean working environment would be maintained during the drying, curing, processing, and packaging stages of cultivation. Among other benefits, this would prevent potential contamination between crop batches. All product would be batch tested prior to processing. In the event of a recall, it would be assured that each batch or variety has not become contaminated during these stages within the processing facility.

Dust Control Measures

In the event of high dust levels, all processing environments would maintain clean working areas to prevent potential dust exposure to employees.

To ensure product quality and to prevent potential contamination of processing environments, certain dust control measures would be implemented. These measures would include maintenance of sanitary working environments and possible implementation of air filtration systems.

Water Access & Facilities

The Project site would provide employees with access to the following facilities/resources within reasonable proximity to work areas:

- Handwashing facilities (processing area).
- Onsite potable water (work areas).
- Restroom facilities (processing area).

Contingency Plan

In accordance with specifications provided by the DEH and the California Unified Program Act (CUPA)—to meet the business plan criteria required to ensure compliance with regulations that are intended to protect public health and the environment—this section addresses water production (including well construction) and the handling of onsite wastewater, solid waste, and hazardous materials.

Summary

The Contingency Plan addresses onsite wastewater and hazardous wastes, solid waste removal and recycling, water production and well construction, hazardous materials handling, agricultural product storage, and chemical spill procedures and handling guidelines.

Material Safety Data Sheets (MSDS) for all fertilizers, soil amendments, and pesticides would be made available onsite. If requested, all equipment maintenance performed onsite would be listed/described. Per California Department of Food and Agriculture (CDFA) regulations, chemicals would be stored separately from fuels, oils, and similar products. Fertilizers and pesticides, specifically, would be stored in locked containment within an outdoor structure.

Chemical spills would be handled and reported per directions in the Project's Chemical Spill Procedure.

Common waste products that would be used or generated onsite include:

- Fertilizers.
- Fuels.
- Household chemicals.
- Human refuse.
- Human waste.
- Pesticides/herbicides/fungicides.

To ensure mitigation of potential pollution of grounds, nearby waterways, and ecological habitats, the proper treatment, storage, removal, and overall security of potentially polluting products would be ensured via use of dedicated areas and containers that are covered and watertight.

Project Waste Management

The sections below address the Project-specific details, impacts, and procedures for handling waste products.

Project Specific Details

A primary residence and auxiliary agricultural structures support the site. Structures are supported by generator use.

Onsite Wastewater/Hazardous Wastes

The proposed Project location is currently using a B&B portable toilet system. Applicant is proposing to equip the processing structure with a septic system. Employees would utilize the current primary system and the proposed septic system for regular uses. Now, no record of permit or data exists regarding age or specifications of the system. Further inspections may be required to identify the septic system's ability to

support increased use during peak seasonal work times and whether it requires an upgrade to meet commercial standards.

The Sponsor has identified that the operation requires fifteen (15) employees during peak staffing to perform seasonal work activities. It is estimated that peak staffing would occur for a duration of approximately six (6) to eight (8) weeks (cumulative) throughout the active working parts of the season.

Project Equipment Inventory

- Generator
- Roto-tiller

Maintenance

Onsite

Project Product Inventory

Household Chemicals (Locked Travel Trailer – Refer to Site Plan)

- Bleach
- Hydrogen Peroxide
- Alcohol

Fuels/Oils (Storage Tent – Refer to Site Plan)

- Motor Oil
- Propane
- Gasoline

Fertilizers/Pesticides/Fungicides/Rodenticides (Locked Storage Box – Refer to Site Plan)

- Azomite – 160 pounds
- Worm castings – 2,000 pounds
- Fish bone meal – 60 pounds
- Feather meal – 60 pounds
- Glacial rock dust – 380 pounds
- Kelp meal – 115 pounds
- Oyster shell – 50 pounds
- Chicken manure – 250 pounds

Waste Management Standards

As per the CCR, Title 8, § 3457, which addresses field sanitation standards, the cultivation site is required to provide access to waste facilities within one-quarter (1/4) mile or a five (5) minute walk, whichever is shorter.

If the primary septic system is not within this accessibility threshold, a portable facility or pit privy may be provided in lieu of septic to support waste activities. The standards for portable waste facilities are as follow:

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- Toilet facilities: Shall be always operational, maintained in a clean and sanitary condition, and kept in good repair. Records of service and maintenance shall be retained for two years.
- Chemical toilet wastewater tank: Shall be constructed of durable, easily cleanable material and have a minimum tank capacity of forty (40) gallons. Construction shall prevent splashing on the occupant, field, or road.
- Chemical tanks: Contents shall be disposed of by draining or pumping into a sanitary sewer, an approved septic tank of sufficient capacity, a suitably sized and constructed holding tank approved by the local health department, or any other method approved by the local health department.
- Privies: Shall be moved to a new site or taken out of service when the pit is filled within two (2) feet of the adjacent ground surface. When the privy is moved, the pit contents will be covered with at least two (2) feet of well-compacted dirt.

Solid Waste Removal/Recycling

All garbage will be contained within a holding structure and is to be removed no less than once per week. All waste and/or recycling materials will be processed by a permitted solid waste/recycling facility. The facility designated to receive waste products for this project is Eel River Resource Recovery in Fortuna, CA.

Water Production/Well Construction

The Project is supported by one (1) 2,500-gallon and two (2) 1,200-gallon water tanks, and one (1) 20,000 gallon bladder (see plot plan for location). The onstream pond currently supports all domestic and cultivation uses.

Approximated water use for activities are denoted within the *Cultivation Schedule* under the Cultivation Plan below. Monthly monitoring and annual reporting must be implemented to identify actual total uses for domestic and cultivation activities.

Hazardous Materials Handling

The Project is supported by Honda 2000 generator and requires fuels to supply the domestic energy needs of the structures or cultivation activities. Other fuels may be used for small equipment and machinery and may include gasoline, oils, and diesel. All fuels used for equipment would be stored per the (CUPA) fuel and chemical storage guidelines.

To meet environmental health standards, applicants must maintain a list of and describe all compressed gases, cleaners, and sanitizers (including, but not limited to, household chemicals, bleach, and alcohol) and document quantities stored onsite. Fuels, pesticides, and other agricultural/household chemicals are required to be stored in locked containment, separate from other input products. Any substance in use shall be accompanied by a posted notification that clearly identifies its nature. To prevent spills onto ground surfaces, any motors, fuel containers, etc. would be stored in drop pans and within an enclosed area.

Hazardous Material Standards

Quantities that trigger disclosure are based on the maximum amount onsite at any one time, as follows:

- 55 gallons, 500 pounds, or 200 cubic feet (for 30 days or more at any time during a year).
- Any amount of hazardous waste.

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- Category I or II pesticides.
- Explosives.
- Extremely hazardous substances (above the planning threshold).

MSDS for all fertilizers, soil amendments, and pesticides (including organically produced examples) would be furnished and made available onsite. Compressed gases, cleaners, and sanitizers are stored on the premises in the quantities outlined in the *Gases and Cleaners* inventory list that is maintained onsite.

Applicants are required under CUPA guidelines to list/describe all equipment maintenance performed onsite (including changing oil, antifreeze, etc.). Upon request, applicant will furnish information regarding ongoing maintenance of small machinery and equipment that is necessary to support cultivation activities.

Agricultural Product Storage

As per the DPR (enforced by CDFA or the local Agriculture Commissioner), Projects that utilize pesticides and fertilizers must meet guidelines pursuant to CCR, § 6670, Title 3, Division 6, *Pesticide, and Pesticide Control Operations*. General guidelines dictate that chemicals are to be stored separately from fuels, oils, and similar products. Fertilizers and pesticides would be stored in locked containment within an enclosed outdoor structure.

Chemical Spill Procedure/Handling

In the event of emergency spills, the incident would be reported to the Cal OES State Warning Center at 800-852-7550 or 916-845-8911. The California Highway Patrol must be notified via 9-1-1 of spills occurring on highways in the State. The *Chemical Spill Procedure* would be followed and emergency services also contacted via 9-1-1. The procedure would follow the California Office of Emergency Services (Cal OES) *California Hazardous Materials Spill/Release Notification Guidance* (February 2014) and the (EPA) (Pacific Southwest, Region 9) *Chemical Spills Prevention and Preparedness* webpage.

In the State of California, many statutes require emergency notification of a hazardous chemical release, including:

- California Labor Code § 6409.1 (b).
- Government Code § 51018, 8670.25.5 (a).
- Health and Safety Code § 25270.8, § 25510.
- Public Utilities Code § 7673 (General Orders #22-B, 161).
- Title 42, U.S. Code § 9603, 11004.
- Vehicle Code § 23112.5.
- Water Code § 13271, § 13272.

In addition to statutes, several agencies have notification or reporting regulations:

- Title 8, CCR, § 342.
- Title 13, CCR, § 1166.
- Title 14, CCR, § 1722 (h).
- Title 17, CCR, § 30295.
- Title 19, CCR, § 2703, 2705.

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- Title 22, CCR, § 66265.56 (j), § 66265.196 (e).
- Title 23, CCR, § 2230, 2250, 2251, 2260.
- Title 40, CFR, § 263 esp. § 263.30.
- Title 49, CFR, § 171.16.

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Security Plan

The Project's *Security Plan* includes product security, inventory management, and diversion prevention. Pertinent regulatory language includes the following:

Assembly Bill 604 (AB-604), Article 3, Mandatory Commercial Registration, § 26040 (5): "Security requirements, including, but not limited to, procedures for limiting access to facilities and for the screening of employees. The department shall require all registrants to maintain an accurate roster of any employee's name, date of birth, and relevant identifying information, which shall be available for inspection by the department or State or local law enforcement upon demand."

AB-604, Article 3, Mandatory Commercial Registration, § 26046 (a)(3): "Operating and inventory control procedures to ensure security and prevent diversion."

AB-604, Article 3, Mandatory Commercial Registration, § 26046 (a)(4): "Detailed operating procedures for the proposed facility, which shall include, but not be limited to, provisions for facility and operational security, prevention of diversion, employee screening, storage of medical cannabis, personnel policies, and recordkeeping procedures."

Summary

The Security Plan details efforts to prevent loss and diversion of medical cannabis product at all stages of its cultivation and processing, including drying, trimming, curing, processing, and packaging. Robust recordkeeping would be implemented and maintained for quality assurance, inventory management, and prevention of diversion.

Measures of Security

Several security measures would be involved in the comprehensive protection of medical cannabis product during the cultivation and processing lifecycles. These include exterior lighting, alarms, cameras and video capture, and the hardening of doors, windows, and fencing.

Security measures for this project would encompass, at a minimum:

- Locked containment for product processing and storage (to be developed).
- Multiple locked gates at all cultivation areas and processing buildings (*see site plan*).
- Surveillance and monitoring systems (to be developed as per the State's requirements).
- Alarm System

Points of Security

- Entrance to the property will be secured by three (3) locked gates.
- A locked and secure building for processing operations.
- Wireless driveway alerts
- Solar motion lights
- Surveillance cameras

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Inventory Management

A rigorous system of recordkeeping and reporting would be facilitated to adhere to the State's Track and Trace requirements of all cannabis products. This would include (but not be limited to) flower, trim, and stem to ensure zero diversion of product throughout processing.

To prevent loss and diversion, all cannabis products would be stored under locked containment during the drying, curing, and packaging phases of processing. Products would also be subject to conformance with a checks and balances system to ensure the prevention of unintentional diversion.

Prevention of Diversion

The most vulnerable stage of product security is transit to retail outlets. The best way to ensure product safety and prevention of diversion and loss is to maintain adequate chain of custody records via the Agricultural Commissioner.

This would occur under the oversight of the CDFA, in congruence with SICPA's Track and Trace Program. Additionally, retail outlets would be informed of expected delivery quantities. This would include packing slips, tamper-evident seals, verification of credibility, liability coverage, and manifests provided by licensed transporters.