

**ATTACHMENT 1A**

**Cultivation and Operations Plan**

**Cultivation and Operations Manual**  
**For**  
**FOREVER LOVING HUMBOLDT COOPERATIVE, INC.**  
APN: 211-341-037  
Apps #: 13077

**Proposed Medical Cannabis Cultivation Facilities**

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## 1. PROJECT SUMMARY

### 1.1. PROJECT OBJECTIVE

Forever Loving Humboldt Cooperative, Inc. is proposing to permit new medical cannabis cultivation activities in accordance with the County of Humboldt's (County) *Commercial Medical Marijuana Land Use Ordinance* (CMMLUO). The project requires a Zoning Clearance Certificate for 10,000 sf of mixed-light cultivation (prime agricultural soils present). The project includes the permitting of proposed facilities appurtenant to the cultivation, including greenhouses, a processing facility for drying, curing, and trimming of medical cannabis, and appropriate water storage.

The applicant aims to become fully compliant with State and Local cultivation regulations.

### 1.2. SITE DESCRIPTION

The Project is located between 300 and 510 Browns Rd., Myers Flat, CA 95554, (APN 211-341-037) approximately 3.3 miles ENE of the community of Myers Flat. The subject parcel is approximately 9.1 acres in size (per the County of Humboldt's WebGIS), having relatively south and southwest facing topography. The slopes vary from less than 10% gradient to approximately 25% gradient, with most of the property with roughly 15% slope. The western half of the property is covered with open grasslands and riparian forest with a class II watercourse from the north. The eastern portion of the property is relatively flat with open grasslands and scattered trees. An existing industrial shop building is located on the eastern portion of the property.

### 1.3. LAND USE

The subject property has a General Plan designation of Agricultural Rural (AR) as identified by the Humboldt County General Plan and is zoned Unclassified (U). Land uses surrounding the parcel are comprised of rural residential, timber and agriculture. The surrounding parcels are zoned Timber Production Zone (TPZ), and Unclassified (U).

### 1.4. STATE AND LOCAL COMPLIANCE

#### 1.4.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

Forever Loving Humboldt Cooperative, Inc. will obtain a Commercial Cannabis Activity license from the State of California at time such a license becomes available.

#### 1.4.2. STATE WATER RESOURCES CONTROL BOARD

Water for nursery and mixed-light cultivation uses are provided by rainwater harvest and a groundwater well on the property. No diversion of surface waters is proposed.

#### 1.4.3. NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

Once the permits are approved for cannabis cultivation on this property, the applicant will enroll with the North Coast Regional Water Quality Control Board (NCRWQCB) for coverage under Tier 2 of Order No. 2015-0023 *Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region*. Subsequent to enrollment, a Water Resources Protection Plan will be developed for the project.

#### **1.4.4. HUMBOLDT COUNTY BUILDING DEPARTMENT**

All necessary building permits will be obtained from the Humboldt County Building Department for all existing and proposed structures and supporting infrastructure upon approval of the Conditional Use Permit.

#### **1.4.5. CAL FIRE**

The subject property is located within a State Responsibility Area (SRA) for fire protection. Several improvements are proposed in order to meet SRA requirements, including designating a fire turn-around and pull-out area for emergency vehicles, and management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirement from property lines. If required by Cal Fire, a 2,500-gallon water tank with a riser to SRA specifications will be installed in addition to the hydrant.

#### **1.4.6. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

A Lake and Streambed Alteration Agreement (LSAA) from the Department of Fish and Wildlife (DFW) will not be required because there are no stream crossings on the site, and water is sourced from an adjacent parcel or a well with appropriate storage for summer forbearance.

#### **1.4.7. CULTURAL RESOURCES**

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

## **2. CULTIVATION AND PROCESSING**

### **2.1. PROPAGATION AND INITIAL TRANSPLANT**

Juvenile plants are propagated on site from 'mother plants' that demonstrate the desired genetics for the specific cannabis strain. Juvenile plants are also obtained from an off-site nursery, when necessary. Mother plants remain in the vegetative stage solely for propagation. Cuttings are sampled from the mother plants and are rooted into a growing medium, typically oasis cubes, to produce 'clones.' The clones are placed into the nursery, and once fully rooted they are transplanted directly into one (1) gallon plastic containers (see Appendix A for nursery location). The juvenile plants are irrigated using hand watering methods. After 2-4 weeks the clones are then transplanted into 20-gallon smart pots with a soil and perlite medium, and moved into either a mixed light greenhouse or outdoor cultivation area where they continue their 'vegetative' cycle.

### **2.2. MIXED LIGHT/OUTDOOR CULTIVATION PLAN AND SCHEDULE**

The mixed light cultivation will occur in four (4) 25'x100' greenhouses for a combined cultivation area of approximately 10,000 square feet. The greenhouses consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each greenhouse is ventilated by intake and exhaust fans. The greenhouses utilize a combination of artificial light and light deprivation to produce up to three

(3) flowering cycles per year. The monthly Cultivation Schedule in Appendix C details the cultivation activities associated with the mixed light cultivation operation for a typical three cycle year.

### **2.3. IRRIGATION PLAN AND SCHEDULE**

Irrigation and fertigation of plants occurs using a drip irrigation system to efficiently utilize water resources. Regular inspections of each plant by the cultivator and tailored irrigation and nutrient application depending on the needs of each individual plant will also be utilized as needed. The monthly Cultivation Schedule in Appendix C details the irrigation activities associated with all cultivation.

### **2.4. HARVESTING, DRYING, AND TRIMMING**

Plants that are ready for harvest have their flowering branches removed and suspended in the drying room which is equipped with ventilation fans. The drying process takes approximately one week.

The dried flowers are then bucked into manageable buds and fed into an automated trimming machine. The machine-trimmed buds receive a finishing trim by hand before being weighed, labeled, logged, and sealed.

The finished product is stored in the processed materials room before being transported to a licensed distribution facility. The waste product, or 'trim', from the machines is collected and placed into bins to be weighed, labeled, and sealed. Trim will be transferred to an offsite, licensed manufacturing facility.

### **2.5. EMPLOYEE PLAN**

Forever Loving Humboldt Cooperative, Inc. is an "agricultural employer" as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 (commencing with Section 1140) of Division 2 of the Labor Code), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

#### **2.5.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY**

- *Agent in Charge*: Responsible for business oversight and management of the Forever Loving Humboldt Cooperative, Inc. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of medical cannabis. Responsibilities include, but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.
- *Assistant Cultivator / Processing Manager*: Provides support to the *Lead Cultivator* in their day to day duties and takes the lead role during times when the *Lead Cultivator* may be off site. Once processing activities commence, the *Assistant Cultivator* duties switch to oversight and management of processing the dried medical cannabis. This is a full-time, seasonal position.
- *Seasonal Laborer*: Provides cultivation, harvesting, and processing support including trim machine operation and hand-finish trimming. This is a part-time to full-time, seasonal position.

#### **2.5.2. STAFFING REQUIREMENTS**

In addition to the *Agent, Lead Cultivator, and Assistant Cultivator positions*, up to four (4) full-time seasonal labor positions are employed. The number of seasonal laborers varies based on the needs of

the farm during the cultivation, harvest and processing seasons. During the peak harvest and processing season, there are an estimated total of seven (7) employees on site.

### **2.5.3. EMPLOYEE TRAINING AND SAFETY**

On site cultivation, harvesting, drying, and trimming is performed by employees trained on each aspect of the procedure including: cultivation and harvesting techniques and use of pruning tools; proper application and storage of pesticides and fertilizers; trim machine use and cleaning; and correct hand trimming methods. All cultivation and processing staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation, drying and processing facilities are limited to authorized and trained staff.

All employees are trained on proper safety procedure including fire safety; use of rubber gloves and respirators; proper hand washing guidelines; and protocol in the event of an emergency. Contact information for the local fire department, CAL FIRE, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted at the employee restroom. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets (MSDS) are kept on site and accessible to employees.

### **2.5.4. TOILET AND HANDWASHING FACILITIES**

Portable toilets will be utilized for the main cultivation area. Employees will work at a distance typically no greater than 250 feet from the restroom facility.

### **2.5.5. ON SITE HOUSING**

No new residential structures are proposed as a part of this project. All full-time and seasonal employees live off site and commute daily to the cultivation site.

## **2.6. SECURITY PLAN AND HOURS OF OPERATION**

### **2.6.1. FACILITY SECURITY**

The cultivation facilities, including greenhouses, processing building, and wholesale nursery will be enclosed in a secure privacy fence. An entry gate will be located off Browns Road on the northern perimeter. The entry gate will remain locked at all times and access to the cultivation area is limited exclusively to employees. Restricted access signs will be posted conspicuously at the entry gate. The cultivation and processing facility area will have low intensity exterior lighting to illuminate the entrances, and will include a small number of motion activated security lights. All lighting will be designed and located so that direct rays are confined to the property. Security cameras will be installed at the main access gates and at entrances to the facilities, and the processing facility will include an alarm system.

### **2.6.2. HOURS OF OPERATION**

Activities associated with cultivation in the greenhouses (watering, transplanting, and harvesting), processing facility and the nursery generally occur during daylight hours. All other activities such as processing will typically occur no earlier than 8 AM and extend no later than 8 PM.

### 3. ENVIRONMENT

#### 3.1. WATER SOURCE AND PROJECTED WATER USE

Water for cultivation and nursery uses is provided by rainwater harvest and a groundwater well. As indicated above, the applicant has registered these shallow wells as riparian diversions due to their proximity to a water course.

Forever Loving Humboldt Cooperative, Inc. utilizes water management strategies to conserve and reuse onsite water and fertilizers to achieve net zero discharge. Refer to section 2.4 for a summary of irrigation practices, and Appendix C for the monthly irrigation schedule.

The table below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use. Overall, the initial estimate for water usage includes 150,000 gallons for 10,000 sf of mixed-light cannabis cultivation, and 40,000 gallons for the 5,000 sf wholesale nursery.

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
500	2,000	10,000	20,000	25,000	35,000	30,000	25,000	20,000	20,000	2,000	500

#### 3.2. WATER STORAGE

Water storage for irrigation use is provided in the form of water storage tanks to meet the summer forbearance period. This project proposes to install 190,000 gallons of storage to cover all cultivation needs.

#### 3.3. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

Forever Loving Humboldt Cooperative, Inc. will enroll the subject parcel with the North Coast Regional Water Quality Control Board (NCRWQCB) for Tier 2 coverage, and a Water Resources Protection Plan (WRPP) will be developed utilizing best management practices (BMP's) in accordance with the NCRWQCB's recommendations.

##### 3.3.1. SITE DRAINAGE AND RUNOFF

The parcel is south and southwest sloping with gradients ranging from under 10% to 25%. Surface water runoff in the wet season generally drains from the top of the property near the northern boundary, to the southwest into a Class II watercourse that eventually drains into Elk Creek to the south of the parcel. Water from roadways and parking areas will be dispersed and directed using several water bars and hydrologically disconnected drainages features. There are no stream crossings on the site. The proposed greenhouses and nursery/processing facility will be located on a graded flat with rainwater harvest to minimize erosion and runoff while maximizing water storage. Fertilizers and pesticides will be stored inside the processing facility with secondary containment to prevent contamination with runoff. Sites have been identified for storage/disposal of spoils and cultivation waste.

All cultivation structures and areas are to be located at least 100 feet away from any watercourses, providing a sufficient buffer to prevent sediment and nutrient delivery. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented including the use of efficient drip irrigation to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone.



### 3.3.2. EROSION CONTROL

The Water Resource Protection Plan (WRPP) will include erosion and sediment control BMP's designed to prevent, contain, and reduce sources of sediment. The WRPP will also include corrective actions to reduce sediment delivery. Additionally, the WRPP requires mulch piles and spoils from any grading to be stored in a designated location away from watercourse.

### 3.4. WATERSHED AND HABITAT PROTECTION

Adherence to the Water Resource Protection Plan (WRPP) will ensure that the watershed and surrounding habitat are protected. The cultivation activities and associated structures are >100 feet from the nearest watercourse, providing a suitable buffer between the cultivation operation and habitat. Additionally, site development and maintenance activities utilize BMP's in accordance with the NCRWQCB's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits and the WRPP.

### 3.5. MONITORING AND REPORTING

Monitoring will be conducted to confirm the effectiveness of corrected measures listed in the Water Resource Protection Plan (WRPP) and determine if the site meets all Standard Conditions. Inspections will include photographic documentation of any controllable sediment discharge sites as identified on the site map. Visual inspection will occur at those locations on the site where pollutants or wastes, if uncontained, could be transported into receiving waters, and those locations where runoff from roads or developed areas drains into or towards surface water. The inspection will also document the progress of any plan element subject to a time schedule, or in the process of being implemented. A monitoring plan is included in the WRPP with photo points identified on WRPP map.

Onsite monitoring shall occur:

- Before and after any significant alteration or upgrade to a given stream crossing, road segment, or other controllable sediment discharge site. Inspection should include photographic documentation, with photo records to be kept on site.
- Prior to October 15 and December 15 to evaluate site preparedness for storm events and stormwater runoff.
- Following any rainfall event with an intensity of 3 inches precipitation in 24 hours. Precipitation data can be obtained from the National Weather Service by entering the site zip code at <http://www.srh.noaa.gov/forecast>.

A Monitoring and Reporting Form (Order No. 2015-0023 Appendix C) will be submitted upon initial enrollment in the Order (NOI) and then annually by March 31 to the Regional Water Board. The annual report will include data from the monitoring reports.

### 3.6. ENERGY AND GENERATOR USE

On-grid electricity is provided by Pacific Gas and Electric (PG&E) for all cultivation activities. Electricity for mixed-light cultivation and indoor operations including lighting, ventilation, and climate control will be sourced from 100% renewable energy and from the purchase of carbon offsets offered through PG&E. Use of the on-site generator is limited to power outage events, and follows all guidelines set up by Humboldt County and the State of California. The generator is located away from the property line to ensure the noise level does not exceed 60 decibels at the property line. The generator and diesel fuel is located within a secondary containment trough.

### **3.7. USE AND STORAGE OF REGULATED PRODUCTS**

#### **3.7.1. BEST MANAGEMENT PRACTICES**

Best Management Practices (BMP's) are employed when storing, handling, mixing, application and disposal of all fertilizers, pesticides and fungicides. All nutrients, pesticides and fungicides are located in a locked storage room, and contained within water tight, locked and labeled containers in accordance with manufactures instruction. Application rates will be tracked and reported with the end of the year monitoring report required in the Water Resources Protection Plan (WRPP). Employees responsible for application are trained to handle, mix, apply or dispose of pesticides/fungicides with proper hand, eye body and respiratory protection in accordance with the manufacturer's recommendations. See the WRPP for complete BMP specifications for the use and storage of regulated products.

#### **3.7.2. FERTILIZERS**

Nutrients and biological inoculants used for cultivation include:

- Earth Juice – Grow
- Earth Juice – Bloom

See Appendix B - *Regulated Products Resource List* for product details.

#### **3.7.3. PESTICIDES AND FUNGICIDES**

Pesticides and fungicides used for cultivation include:

- Green Cleaner
- Safer Brand Insecticidal Soap
- Dr. Zymes

See Appendix B - *Regulated Products Resource List* for product details.

#### **3.7.4. FUELS AND OILS**

Fuels and oils stored on site include:

- Gasoline – 10 Gallons
- Diesel – 10 Gallons

### **3.8. WASTE MANAGEMENT PLAN**

#### **3.8.1. SOLID WASTE MANAGEMENT**

Trash and recycling containers are located within the garage and processing facility. The trash containers are enclosed to prevent animal intrusion, and have secondary containment to prevent runoff. Solid waste and recycling is hauled off-site to the Humboldt Waste Management Authority transfer station at least once per week.

#### **3.8.2. CULTIVATION WASTE AND SOIL MANAGEMENT**

Cultivation vegetative matter such as root balls, branches, and leaves are composted at a designated area (see site plan). Spent potting soil is stored in a designated contained covered area that is lined to prevent any soil erosion or nutrient seepage. The soils are analyzed by Soilscape Solutions, a local consulting firm providing soil testing, analysis, and management services. After consultation, the soils are amended and reused. Used pots will be collected and stored in the processing building for the

winter. All packaging from soil amendments and fertilizers will be collected and disposed at an appropriate facility.

### **3.8.3. WASTEWATER MANAGEMENT**

The water management plan aims to achieve an entirely closed-cycle irrigation and nutrient system. Drip irrigation, and precise hand watering methods minimize the over-irrigation of plants and subsequent runoff. Moreover, the greenhouse floors are designed to capture any runoff from irrigation for reuse in the fertilization holding tank. All runoff recaptured is tested and augmented to plant nutrient specifications, and eventually recycled into the fertigation system.

A permitted septic system will be installed for the proposed processing building.

## **4. PRODUCT MANAGEMENT**

### **4.1. PRODUCT TESTING AND LABELING**

Samples are selected from individual harvested cannabis strains and are tested by a licensed third-party lab in accordance with State and local standards. The finished product is labeled with the Forever Loving Humboldt, Inc. logo, and will include tracking ID's provided by the County of Humboldt and/or Statewide tracking systems once they become available.

### **4.2. PRODUCT INVENTORY AND TRACKING**

Until such time as either a County or Statewide cannabis product and inventory tracking system becomes available, an internally-developed system of inventory and tracking is utilized. The Agent in Charge and Lead Cultivator ensure all medical cannabis from clone to packaged product is tracked, accounted for and inventoried. Records are kept at each phase of the harvest and processing operation for reporting and compliance with State and Local regulations. The information recorded for each harvest includes:

- Cultivation canopy area
- Weight of flowers, by-product, and trim waste after drying and separation
- Weight of buds after trimming
- Product ID numbers and product weight
- Staff identification (at each step)
- Physical location of the plant material at all times

### **4.3. TRANSPORTATION AND DISTRIBUTION**

Transportation will be handled by a third-party, contracted, licensed transporter/distributor in accordance with State and Local regulations. All merchantable product will be distributed through licensed medical cannabis dispensaries. Prior to moving packages from the on-site holding facility to another physical location, a transport manifest will be created by the distributor/transporter and will include:

- Product ID numbers and product weight
- Route to be travelled
- Origin and destination addresses
- Time of departure
- Time of arrival

The *Agent in Charge* and the *Processing Manager* are responsible for performing a physical inventory of all packages being transported, and ensuring that the physical inventory coincides with the transport manifest.

## Appendix A: Site Plan



## APPENDIX B: REGULATED PRODUCTS LIST

### Cleaning Agents:

Hydrogen Peroxide

Isopropyl Alcohol 91%

### Pesticides and fungicides:

Green Cleaner: [http://media.hydroponics.net/item-documents/old-stage/140883/green-cleaner\\_msds.pdf](http://media.hydroponics.net/item-documents/old-stage/140883/green-cleaner_msds.pdf)

Safer Brand Insecticidal Soap: <http://www.saferbrand.com/safer-brand-insect-killing-soap-concentrate-16-oz-5118-6>

Dr. Zymes: <http://www.doctorzymes.com/pesticide-free-insecticide.php>

### Fertilizers and biological inoculants:

Earth Juice – Grow: <http://www.hydro-organics.com/site/products/fertilizers-liquid/earth-juice-grow-original-formula-j031/>

Earth Juice – Bloom: <http://www.hydro-organics.com/site/products/fertilizers-liquid/earth-juice-bloom-original-formula-j001/>



## **Appendix C: References**

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