



Cultivation and Operations Plan



APN 216-392-006

10930



3355 Rancho Sequoia Drive
Alderpoint

June 21, 2021 (v2.1)

Submitted to:



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Preface

This Cannabis Cultivation and Operations Plan (CCOP) is hereby submitted to comply with the California Emergency Regulations for Cannabis Cultivation (CERCC). Compliance is required by CalCannabis Cultivation Licensing which is a division of the California Department of Food and Agriculture (CDFA). The CCOP is required to be in compliance with County and State law, as applicable, and the following items within the CCOP are regulated by CDFA:

- A. Canopy area(s), including noncontiguous aggregate square footage.
- B. Area(s) outside of the canopy where only immature plants shall be maintained.
- C. Pesticide and other agricultural chemical storage area(s).
- D. On-site processing area(s).
- E. Designated on-site packaging area(s).
- F. Secured area(s) for cannabis waste.
- G. Composting area(s), if composting cannabis waste on site.
- H. Storage area(s) for harvested cannabis.
- I. Compliance with *California Water Code §13149* policies for cannabis cultivation.
- J. Compliance with any conditions requested by the California Department of Fish and Wildlife (DFW) and the State Water Resources Control Board (SWCB).
- K. Dark Sky policies to avoid nighttime glare.
- L. Discovery of human remains policies as required by *California Health and Safety Code §7050.5*.
- M. Renewable energy requirements.
- N. Solar power systems use requirements.

Further, Humboldt County requires a CCOP for a cannabis business permit under Humboldt County Code (HCC) Chapter 3 Division 1 Title III §313 55.4, known as the Commercial Medical Marijuana Land Use Ordinance (CMMLUO). The CMMLUO regulates compliance at the local governmental level to ensure that conditions required under state and local law, or those requested by any agency with jurisdiction, are implemented as proposed within the CCOP. Therefore, the purpose of this CCOP is to identify and outline the methods to be used to meet the minimum requirements for CDFA licensing, Humboldt County Planning and Building Department permitting, and any other local or state requirements.

I. Project Location

California Top Shelf Family is located at APN 216-392-006 in Alderpoint in the area colloquially known as “Murder Mountain” (Figure 1). The site is accessed via Highway 101, to Alderpoint Road heading east fourteen and one-half miles (14.5mi) to Rancho Sequoia Drive, and approximately two and one-half miles (2.5mi) on Rancho Sequoia to Center Drive to reach 3355 Rancho Sequoia Drive. The general elevation of the parcel is two thousand four hundred feet (2,400’) in elevation above sea level, within the southern drainage of Steelhead Creek, and is part of the Eel River watershed.

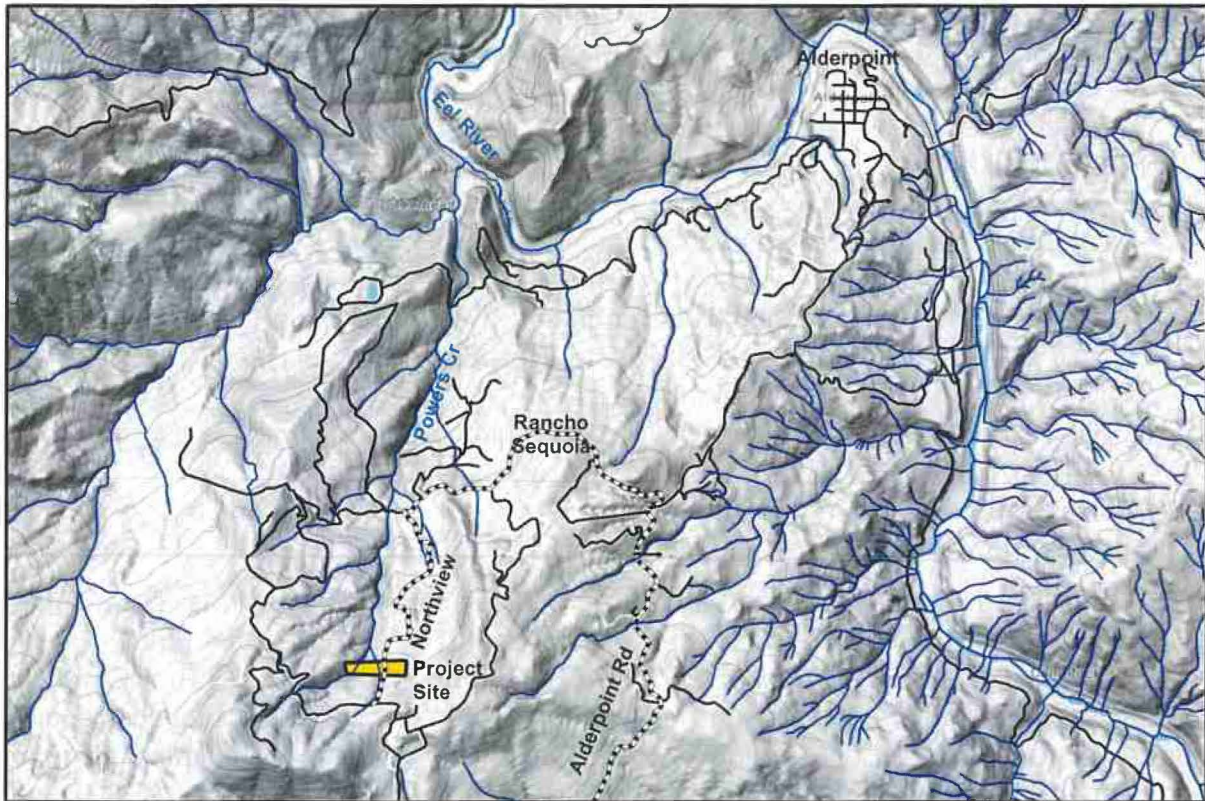


Figure 1: Project Location

A. Utilities

The parcel lacks basic electrical or telephone utilities services as it is remote. On-site services for human waste have not been developed. A water diversion of a Class III Stream to Powers Creek provided water for past cultivation and was registered with DWR S028038 at 40.1358 North and -123.6536 West on November 30, 2018. A well was attempted in 2018 by Fisch Well Drilling which resulted in an empty hole.

B. Zoning

The intent of Humboldt County Zoning Code is to implement the policies and elements of the Humboldt County General Plan. The Code is based upon Principle Zones

and has further Combining Zones. All uses and development regulations of the Principal Zone apply in the Combining Zone, except, they are modified by the uses and regulations allowed within the Combining Zone regulations.

California Top Shelf Family is generally Principally Zoned as Forestry Recreational (FRE) with a Combining Zone with a Special Building Site of 5 Acres (B-5) on Ten Acres (10). FR Zone is intended to be applied to forested areas of the County in which timber production and recreation are the desirable predominant uses and agriculture is the secondary use, and in which protection of the timber and recreational lands is essential to the general welfare. The zone determines overall development and allows the following:

1. Forestry Recreational
 - a. Principally Permitted: single family and farm dwelling, general agricultural uses, nurseries, greenhouses, roadside agricultural sales, public stables, golf courses, noncommercial recreation, social clubs and organizations, and manufactured homes.
 - b. Uses with a Permit: hotels and motels, manufactured home park, two or multiple family dwellings, restaurants, food market, gas station, commercial recreation facilities, animal or timber processing plants, cemeteries, animal or fur farms, veterinarian hospital and kennels, wreckage or salvage yards, or anything compatible but not enumerated within Zoning Code.

C. Principally Permitted Uses

Principally permitted uses allow agricultural within the zone which is intended for timber production as a secondary use. All agricultural uses found under Principally Permitted shall require a simple "Agricultural Exempt Permit". It shall be necessary to apply for such permitting using the Plot Plan and simple forms from the Humboldt County Building Department for the following items:

1. Home.
2. Greenhouses.
3. Water Tanks up to five thousand gallons (5,000gal).
4. Processing facilities (barns).
5. Storage sheds.

D. Site Hydrology

The area of use is located on the eastern slope of the Powers Creek watershed. The creek is a tributary of Steelhead Creek which flows into the Main Fork Eel River two and one-half miles downriver from Alderpoint. The western side of the parcel is more than thirty percent (<30%) in slope, with Powers Creek flowing through it (Figure 2). There is also a Class III Stream which flows adjacent to the road. The cultivation site is approximately one hundred fifty feet (150') in between both streams on a flat at the at the two thousand four hundred feet (2,400') contour. The location has the potential of environmental impact due to discharge to surface waters.

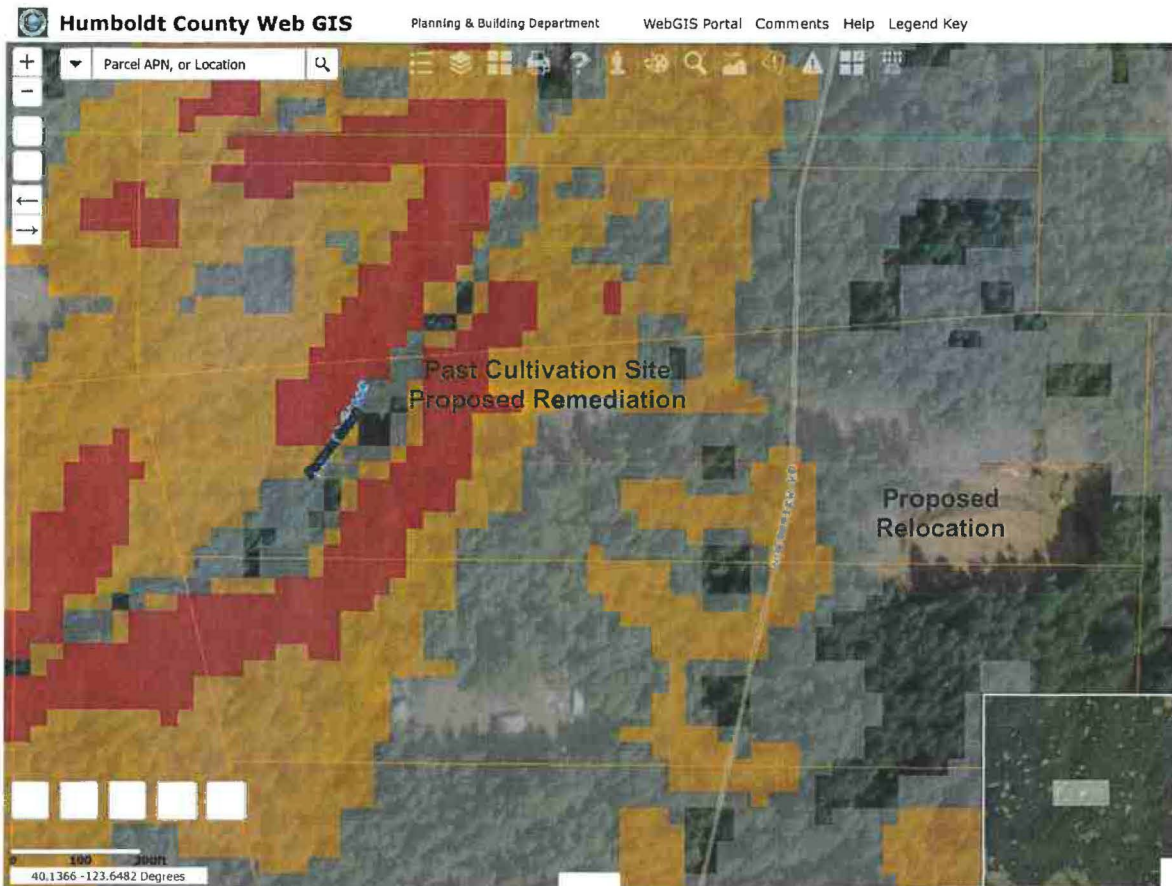


Figure 2: Humboldt County Planning GIS Parcel Slope

E. Climate

Rain gauge records accessible via Western Regional Climate Center's (WRCC) are not consistent for the Southern Humboldt area. To understand the climate of the area requires a review of both Garberville and Alderpoint records (Figures 3 & 4). The area on average experiences fifty-seven inches (57") of rain annually, can see extreme precipitation as high as one hundred eight inches (108"), and during a drought as low as twenty-five inches (25"). Average temperature during the summer months of agricultural production is ninety degrees Fahrenheit (90°F) and in reached one hundred fifteen degrees Fahrenheit (115°F) during extreme heat conditions.

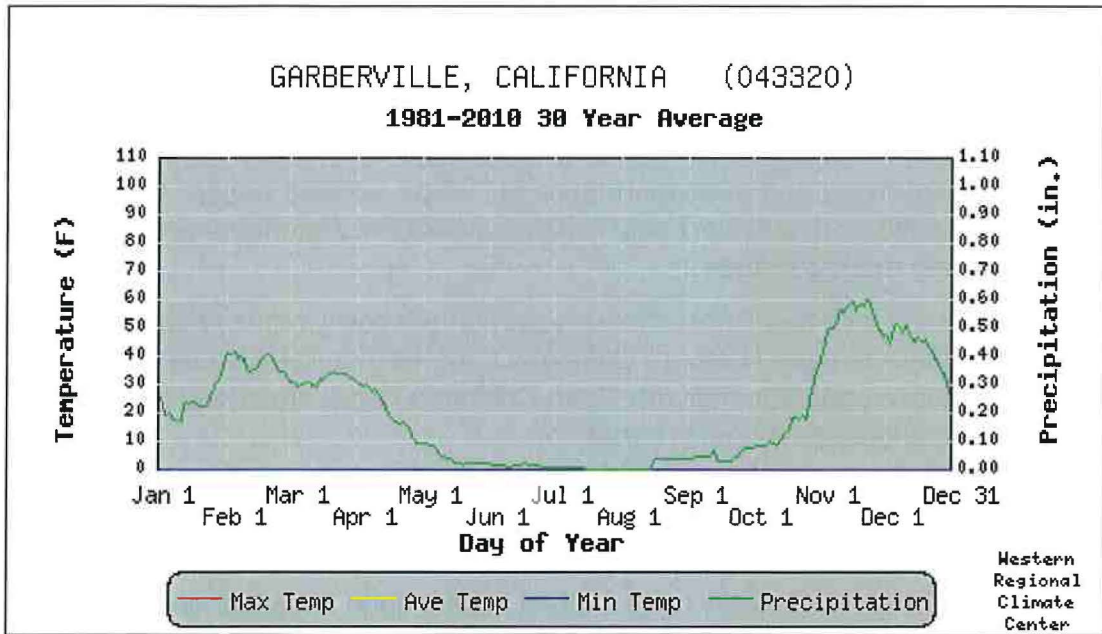


Figure 3: WRCC Garberville Station Climate Data

Source: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca3320>

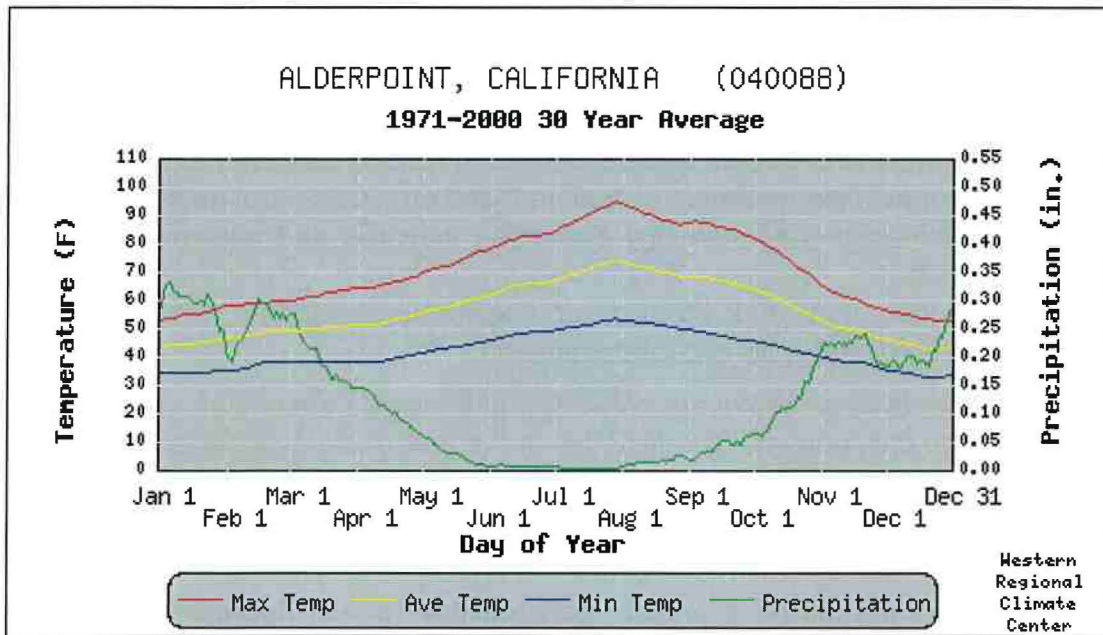


Figure 4: WRCC Alderpoint Station Climate Data

<https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca0088>

F. Fisheries

There are many Species of Concern within the project site, some of which have state and federal protection, including Threatened and Endangered Species status.

Operations can have an impact to these species at any time due to noncompliance with environmental regulations. These species can be vegetation, aquatic lifeforms, and terrestrial wildlife including the Northern Spotted Owl (*Strix occidentalis caurina*).

Species of most concern regarding operations and direct impacts are salmon found within local rivers and streams (Figure 5). These species require clean, cool, and flowing river conditions to survive. Local fisheries which are dependent upon water quality for spawning and rearing include:

1. Fall-run California Coast Chinook salmon (*Oncorhynchus tshawytscha*)
2. Southern Oregon Northern California coho salmon (*O. kisutch*)
3. Winter-run and summer-run North California Coast steelhead (*O. mykiss*)
4. Resident rainbow trout (*O. mykiss*)
5. Anadromous coastal cutthroat trout (*O. clarkii*)
6. Pacific Lamprey (*Entosphenus tridentatus*)
7. Green sturgeon (*Acipenser medirostris*)

Operations can potentially have a direct impact upon the water quality of the Class II stream. This in turn affects the salmonid fishery of the Eel River. Impacts to the Eel River fishery can be created through a number of ways including:

1. Diversion during forbearance period which directly reduces in-stream flows and increase temperatures for juvenile rearing habitat.
2. Diversion rates higher than allowed which reduce instream flows needs for seasonal migration and spawning.
3. Infiltration of nutrients beyond the crop root zone into the stream which contribute to in-stream algae blooms and reduce dissolved oxygen levels.
4. Improper implementation of sediment and erosion control measures can result in increased water turbidity damaging fish gills and covering up spawning gravels.
5. Improper use and storage of hazardous materials which can cause environmental spills and contamination.

The impacts listed above are only a few of the way's operations can have a direct impact upon the environment. The fisheries in the area have evolved to a life cycle that is timed with the local water cycle of rain from late fall to early spring (Figure 4). Water use for seasonal cannabis operations are in direct opposition to the salmonid fishery life cycle which is protected by state and federal law.

Therefore, it shall be a primary concern that project operations minimize and mitigate impacts to the local environment. How this shall be accomplished is through the implementation of all requests made by the SWB or DFW. All requirements shall be adhered as found within permits, including discharge and water forbearance periods, development of environmentally responsive business policies and procedures, and regular monitoring with recording of on-site conditions.

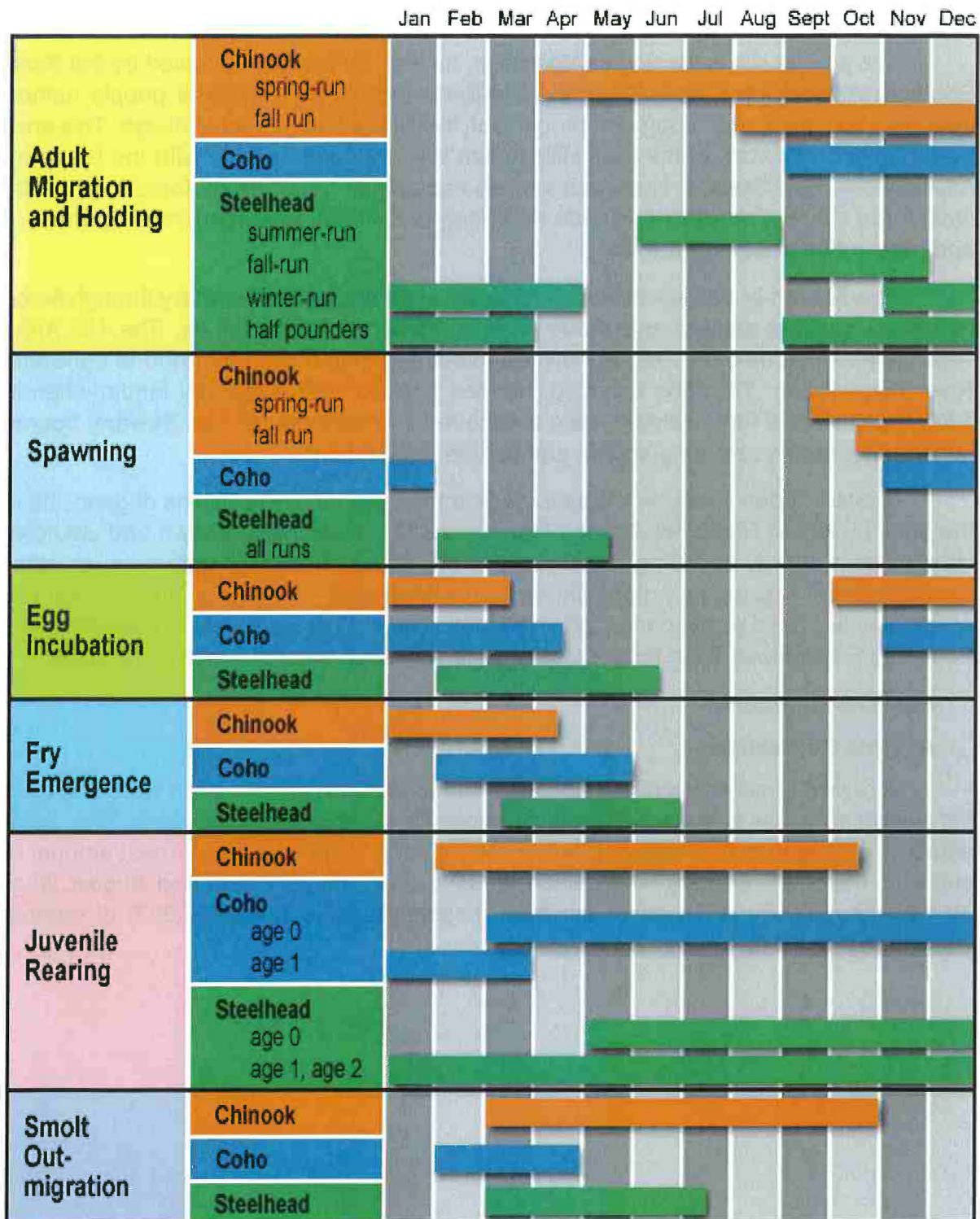


Figure 5: Northern California Salmon Life Cycle Calendar

Source: <http://www.trrp.net/wordterrain/wp-content/uploads/2017/07/fishresources1.gif>

G. Historic Resources

The project site is located in Alderpoint, an area historically occupied by Eel River Southern Athapaskans, specifically the Set-ten-bi-den ke-ah, or Lassik people named after their last chief, and Alderpoint proper was the site of a large winter village. This area was the center location of the Bald Hills Indian Wars of 1858 to 1864 with the US Army positioned at Fort Seward. Humboldt's tribes experience genocide by forced removals, indentured slavery, massacre, human trafficking of children, food resources decimated, and other inhumane aggressions.

The Set-ten-bi-den ke-ah were successful in defending their territory through fierce resistance against settlers and drove them out from their homelands. The US Army violently resettled them in 1862 to Fort Humboldt and then moved the tribe to the Smith River Reservation. The tribe escaped, headed back to their traditional lands, when in 1963 the chief and forty warriors were recaptured by militiamen at Fort Seward, bound, summarily executed by firing squad, and burned upon a pyre.

Set-ten-bi-den ke-ah no longer exist as a tribe and were the victims of genocide in the early history of Humboldt County. Many areas are historic with known and unknown sites of past activity including displacement, homicide, hunting or gathering, or other important tribal resources; potentially including the parcel. Any and all tribal resources which may be found would come under the jurisdiction of the Bear River Tribe who are a Federally Recognized Tribe for the cataloging and preservation of historic resources.

II. Past Development

A. Past Cultivation

A review of publicly available satellite imagery shows that the sites were first used for cultivation since at least 2010 and possible for the decade before then. The water source for the parcel has always been an illegal water diversion. The largest amount of cultivation appears to have taken place in 2015 when imagery captured August 28 at 40.136543 -123.654413 showed nineteen thousand square feet (19,000'²) of outdoor cultivation (Figure 6).



Figure 6: Evidence of Past Cultivation August 28, 2015 TerraServer

B. Less Than 3-Acre Timber Conversion

In early 2016 a Less Than 3 Acre Conversion Exemption was submitted by Chris Carroll, Registered Professional Forester (RPF) #2628, of Timberland Resource Consultants. A permit was granted by Humboldt County Planning Department under **Application Number 10131 and Case Number TRM16-009.**

On March 30, 2016 the Less Than 3 Acre Conversion was accepted and Topher Henderson of CalFire acknowledged acceptance of the Less Than 3 Acre Conversion Exemption on April 5 with **Exemption Number 1-16EX-081-HUM.** The Exemption was dependent upon the project meeting the Forest Practices Act. Approximately one and three-quarter acre (1.75ac) of area was harvested timber the summer of 2016 and a landing flat graded following the two thousand four hundred-foot (2400') contour which is a fairly flat slope (Figure 6).

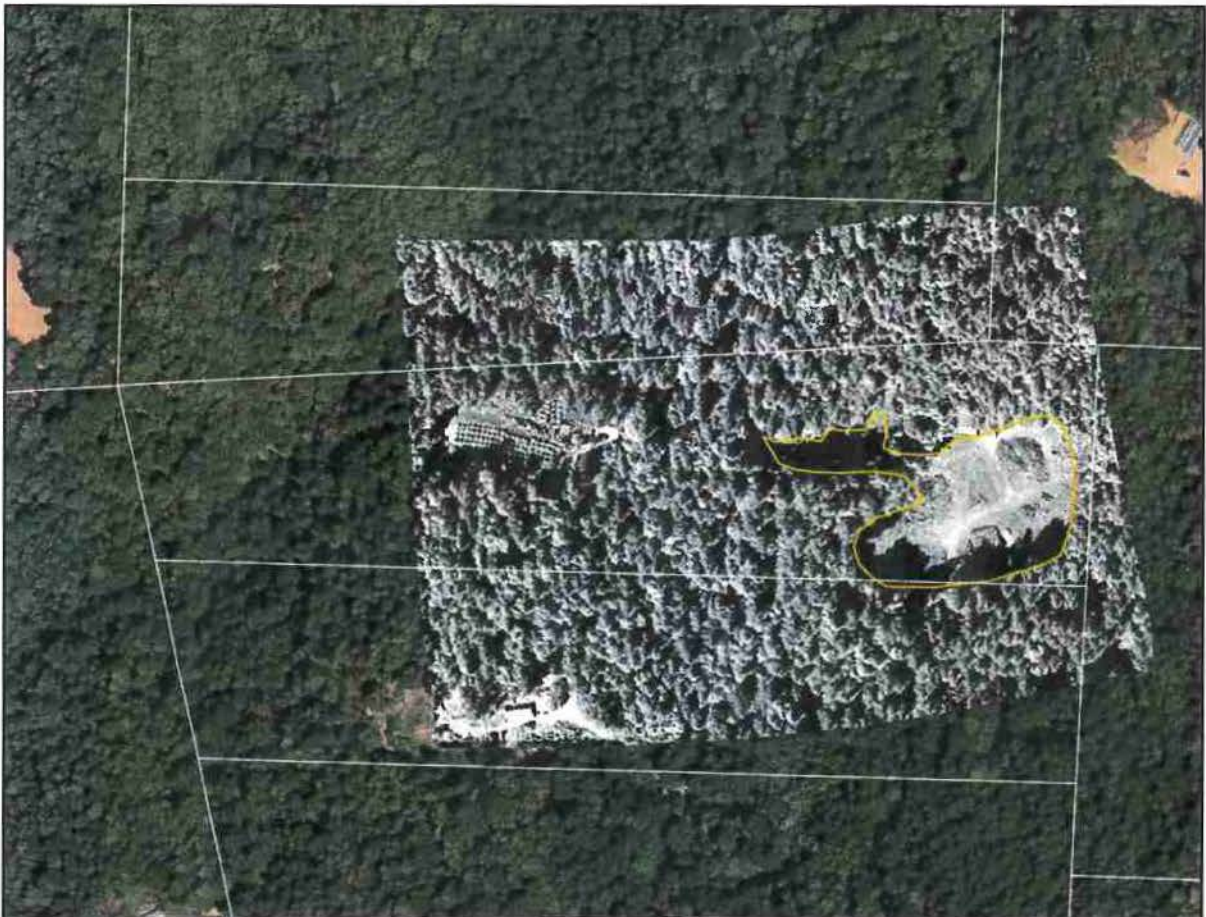


Figure 6: Completed 3-Acre Conversion July 28, 2016 TerraServer

III. Operations Plan

The following Cultivation and Operations Plan is to identify and outline the methods to be used to meet the minimum requirements for Cdfa licensing, Humboldt County Planning and Building Department permitting, and any other local or state requirements related to cannabis production. These methods shall be requirements of maintaining compliance with local and state regulatory agencies. Strict adherence to development and implementation of the project site as stated shall be of the utmost importance.

A. Implementation Schedule

Implementation of this project shall be ongoing to maintain compliance with ever changing regulations from numerous agencies, including but not limited to, the County of Humboldt and the State of California. Meeting full compliance with State laws is dependent upon a Humboldt County Cannabis Permit before any construction can occur. The SWB Discharge Permit DFW LSA 1600 both have five (5) year deadlines to meet compliance which have been approved (Table 1). The intent is to complete compliance requirements within two-(2) years once a Humboldt County Cannabis Permit has been issued.

All construction related activities shall be implemented under a Building Permit and occur between April 15 and October 15 with site winterization by November 1. Compliance construction shall be undertaken immediately upon receipt of the Cannabis Permit and scheduled to be completed within two (2) years. Building Permits are good for six (6) months and any extensions shall be sought at the Building Department before it expires as failure to do so may result in repayment of fees to restart construction.

Table 1: Permits as of January 2021

Permit	Agency	Number(s)	Effective	Expiration
3ac Conversion	CalFire	1-16EX-081 HUM	04/05/2016	Completed
Discharge Permit	NCRWQB	1B170623CHUM	06/16/2017	08/13/2020
1600 LSA	CA DFW	1600-2018-0352-R1	12/31/2018	1600 LSA
Discharge Permit	CA SWB	1 12CC427907	08/24/2020	04/15/2024
1600 LSA	CA DFW	1600-2018-0614-R1	03/23/2020	03/23/2025
Initial Statement of Water Diversion and Use	CA DWR	S028038	11/30/2018	Claimed
401 WQC	NCRWQB	APPLIED 01/05/2021	TBD	TBD
404 CWA	US ACE	APPLIED 01/05/2021	TBD	TBD
Well	Humboldt DEH CA DWR	TBD - Applied 01/15/2021	TDB - Fisch Well Drilling	SWB Reporting

B. Discovery of Human Remains or Archeological Resources

California Health and Safety Code §7050.5 requires operations to cease in the advent of the discovery of human remains. Further, Humboldt County requires cessation of activities should archeological resources be inadvertently found. There are potential to find such remains or resources due to the history of the area. Disturbance without notification, with intent to possess or to maliciously destroy such items, carries the weight of the law, including and not limited to, felony charges.

The following actions shall immediately occur upon the discovery of human remains or archeological resources:

1. Human Remains

- a. Operations shall immediately cease in the advent of the discovery of human remains.
- b. The Humboldt County Sherriff Department shall be notified at (707) 445-7251.
- c. The Humboldt County Coroner shall be notified at (707) 445-7242.
- d. The Bear River Tribal Heritage Preservation Office shall be notified at (707) 733-1900.
- e. The Humboldt County Planning Department shall be notified at (707) 445-7541.

2. Archeological Resources

- a. Operations shall immediately cease in the advent of the discovery of archeological resources, including but not limited to:
 - i. Obsidian or chert tools such as arrowheads, axes, knives, or spears.
 - ii. Obsidian or chert flakes.
 - iii. Stone tools.
 - iv. Groundstone artifacts.
 - v. Locally darkened midden soils.
- b. The Bear River Tribal Heritage Preservation Office shall be notified at (707) 733-1900.
- c. The Humboldt County Planning Department shall be notified at (707) 445-7541.

The following regards Archeological Resources:

- 1. Cultural Resources Investigation was performed June 2020 by Nick Angeloff, MA of Archaeological Research and Supply, a Licensed and Qualified Archaeologist, with a finding on page three (pg3) which can be interpreted as “No Significant Impact to Archeological Resources”.**
 - a. This project will not affect significant prehistoric resources.
 - b. There were no significant constraints regarding the survey of these project areas.
 - c. It is recommended that no further archaeological studies be conducted for these properties. However, there is always the possibility for buried

archaeological deposits, if this or any other project conducted on these properties inadvertently discover cultural resources, all work should halt within 100 feet of the find and a qualified archaeologist and tribal representatives should be contacted immediately to evaluate the find.

C. On-site Relocation and Remediation

The project site and cultivation area shall require an on-site relocation and remediation as an environmentally superior option for watershed protection. The past cultivation area is located in the middle of the confluence of Class II Powers Creek and a Class III stream. The later stream has an undersized misaligned culvert and diversion servicing the old site which is filled with cultivation materials, primitive shed, RVs, and debris. To meet environmental and operational requirement the site shall need to be removed, relocated, reseeding with native vegetation, culvert removed, streambed restored, and driveway blocked at property boundary.

The following are shall occur prior to development:

- 1. Remove cultivation soils or other items which are reusable for the relocated cultivation site within the 3ac conversion completed in 2016.***
- 2. Removal and proper disposal of debris, camp site, RVs, and solid waste.***
- 3. Remediation of the past cultivation area as stated with the SWB WRRP/SMP with native vegetation.***
- 4. Removal of the misaligned and undersized culvert.***
- 5. Restoration of the Class III Streambed.***
- 6. Block off old driveway access to the riparian area with boulders.***

The following are compliance requirements for On-Site Remediation:

- 1. Meet all permitting requirements to work within a Class II Stream, including but not limited to Humboldt County, State, and Federal.***
- 2. DFW §1600 LSA Compliance with all measures identified including, but not limited to, culvert and road upgrades, under permitting from all agencies.***
- 3. State Water Board compliance with all measures identified within the Water Resources Protection Plan shall be implemented, including but not limited to, culvert removal, road upgrades, and remediation.***
- 1. A licensed and qualified professional shall design and submit a site remediation plan.***
- 2. A licensed and qualified professional shall design and submit a permit for the culvert removal and streambed restoration.***
- 3. A licensed and qualified contractor shall submit a demolition plan and implement the remediation plan, culvert removal, restore the streambed, and block the driveway.***
- 4. Construction shall be undertaken April 15 to October 31, preferably, later in the season when the streams are dry.***

D. Farm Operations

Pursuant to the MCRSA §19322(a)(9), the Project Site is an “agricultural employer”, as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with §1140) of Division 2 of the Labor Code, to the extent not prohibited by law.

The Project Site shall be employing persons for hire as allowable by law.

1. It is anticipated that operations shall consist of three (3) fulltime employees.
2. If ever over 20 employees are hired, they shall be allowed to unionize and negotiate a Labor Peace Agreement according to MCRSA §19322(a)(6).

The Project Site shall comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, Americans with Disabilities Act (ADA), and the Humboldt County Code (including the Building Code). At all times, employees shall have access to safe drinking water, toilets, and handwashing facilities that comply with all applicable federal, state, and local laws and regulations. On site-housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

E. Employee Safety Practices

Project Site operations and processing shall implement safety protocols to protect the health and safety of its employees. All employees shall be provided with adequate safety training relevant to their specific job functions, which may include:

1. Emergency action response planning.
 - a. Employees shall be trained and certified in basic CPR & 1st Aid.
 - b. CPR & 1st Aid Kit Stations shall be provided and easily accessible within the cultivation areas, restroom, and drying facility.
 - c. Emergency shower and eye wash station shall be installed.
 - d. Employees with known allergies that could be a health concern in a remote agricultural setting shall inform management, and if require an EpiPen, shall carry said provisions with them at all times while on-site.
 - e. If feasible, a working phone connection or emergency call button connected to a monitored security system shall be put into use.
 - f. Emergency call buttons, depending on circumstances, may or may not be placed within the greenhouses and processing facility.
 - g. Employees shall be provided with handheld communication devices with a secure channel for on-site use.
2. Employee accident reporting and investigation policies.
 - a. All accidents shall be reported to management.
 - b. Management shall investigate and keep written reports of accidents.
 - c. Reporting to authorities shall be accordingly to the requirements of law.
3. Fire prevention.

- a. CalFire Fire Safe regulations (Title 14 Code of California Regulations: Division 1.5, Chapter 7, Subchapter 2, Articles 1-5) shall be met.
 - b. A Licensed Forester shall compose a Fuels Reduction Plan to meet Calfire and DFW regulatory concerns which shall be implemented.
 - c. All employees shall be trained with fire safe methods and in the proper use of fire extinguishers.
 - d. Fire extinguishers shall be available in the cultivation areas and drying facility in the advent of an emergency.
 - e. Fire extinguishers shall be maintained and certified on an annual basis.
 - f. The dedicated water storage tank and nipple shall be inspected on an annual basis to ensure viability.
4. Hazard communication policies, including maintenance of material safety data sheets (MSDS).
 - a. Employees shall be trained in the proper handling of all hazardous materials, if any are ever used.
 - b. Employees shall be provided secure communication devices for communication and emergencies.
 - c. MSDS of any applicable hazardous materials shall be posted visibly on-site at all times.
 5. Materials handling policies.
 - a. Employees shall be trained on handling cannabis and other related materials on an annual basis.
 6. Job hazard analyses.
 - a. Employees may be exposed to agricultural related risks and informed of such.
 - b. Within the first year of operations on-site risks shall be assessed by an independent OSHA expert to reduce job hazards within a risk management plan as applicable by law.
 - c. The risk management plan shall be implemented to reduce identified issues.
 7. Personal protective equipment policies; including respiratory protection.
 - a. Bear Butte Farms shall provide personal safety equipment for use such as OSHA certified safety glasses (tinted and clear), hardhats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection.
 - b. Employees shall be trained in the use, expected to make use, and have ample access to personal protective equipment provided by Bear Butte Farms.
 - c. Storage areas for personal safety equipment shall be provided.

F. Emergency Contacts

Project Site operations and processing facilities shall visibly post and maintain an emergency contact list which includes at a minimum:

1. Operation manager contact(s):
 - a. Owner: (858)230-1404
 - b. Manager: To Be Determined and Updated.
2. Emergency responder contact(s):
 - a. EMERGENCY CALL 911
 - b. Nonemergency Sheriff: (707) 445-7251
 - c. Alderpoint CalFire Station: (707) 926-5353
 - d. City Ambulance: (707) 445-4907
3. Poison control contact(s):
 - a. EMERGENCY CALL 911
 - b. Poison Control Centers 1-800-222-1222

Operations shall implement safety protocols to protect health and safety, property, and the environment through adequate planning and training relevant to specific operations including, and not limited to, the following:

1. State Water Board compliance with all measures identified within the **SWB WRRP/SMP shall be implemented.**
2. **Permit to Operate** a Tier 4 generator obtained from the Local Air District.
3. **Track & Trace with training** in accordance with the policies of County of Humboldt and State of California.
4. **Private Applicator Certification** shall be undertaken with the Humboldt County Agricultural Commissioner.
5. **Drinking water shall be provided such as on-site filtration, or, bottled water or a water cooler from an off-site potable source.**
6. **Human wastewater shall be managed by on-site permitted septic system with an ADA-compliant processing facility restroom.**
7. **Dedicated ADA-compliant parking shall be provided separate from standard parking.**
8. **Equipment required for the safe handling of cannabis shall readily be available on-site at all times.**
 - a. All personal equipment shall meet all local and state requirements while being OSHA compliant.
 - b. OSHA certified safety glasses (tinted and clear), hats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection shall be on-site and used as required.
 - c. Training in the use of personal protective equipment shall be undertaken on an annual basis.
9. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations. Additionally, this plan shall incorporate:

- a. **Dark Sky Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all Humboldt County and State of California regulations.
 - b. **Policies concerning CPR & 1st Aid** shall be developed and implemented.
 - i. 1st Aid Station(s) shall be provided on-site.
 - c. **Fire prevention meeting CalFire Fire Safe standards** shall be incorporated and implemented.
 - i. A minimum of five thousand-gallons (5,000gal) of water shall be dedicated for CalFire Fire Safe purposes and not connected to the Cultivation Area.
 - ii. A minimum of two (2) dry chemical fire extinguishers shall be maintained and certified on an annual basis with a twenty-pound (20lb) capacity in easily accessible locations.
10. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all County of Humboldt and State of California regulations;
 11. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations.
 12. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations.
 13. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations.
 14. **Pesticide Management Plan** shall be developed with training for **Private Applicator Certification**, and a written copy of the plan and certification shall be on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
 15. **Nitrogen Management Plan shall be developed by a Qualified Professional**, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County, State of California, and Federal regulations.
 16. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.

G. Schedule of Operations

The operations plan is to develop cultivation in the timber conversion area. Total cultivation shall equal eighteen thousand four hundred ninety-two square feet (18,492'²) outdoor cultivation utilizing light deprivation (DEP) greenhouses. Operations shall follow a fairly consistent annual set schedule of events (Table 2).

Propagation shall twice a year with seed stock or immature starts with the Nursery Propagation Greenhouse. Twice a year immature plants shall be vegetated for about (2) months within the nursery for each harvest prior to be planted within the Cultivation Area. Flowering within the Cultivation Area shall occur staggered twice over a five (5) month period. With two (2) harvests, processing each time occurs over a period of a couple months to allow for drying, curing, and packaging.

Month	Average Sunrise/Sunset	Hours of Operation	DEP Covers Hours of Use
January	7:30am / 5:15pm	N/A	N/A
February	7:05am / 5:50pm	N/A	N/A
March	7:10am / 7:10pm	N/A	N/A
April	6:35am / 7:55pm	7am to 7pm	N/A
May	6:00am / 8:25pm	7am to 7pm	7pm – 7am
June	5:50am / 8:45pm	7am to 7pm	7pm - 7am
July	6:00am / 8:40pm	7am to 7pm	7pm – 7am
August	6:30am / 8:10pm	7am to 7pm	7pm - 7am
September	7:00am / 7:20pm	7am to 7pm	7pm – 7am
October	7:30am / 6:30pm	7am to 7pm	7pm - 7am
November	7:00am / 5pm	N/A	N/A
December	7:30am / 4:50pm	N/A	N/A

Record keeping of past water use was not undertaken. Water use has been estimated based upon a peak use in August of one thousand hundred thousand gallons per day (1,000gal/day) per ten thousand square feet (10,000'²). Total estimated water use for operations are approximately two hundred twenty-three thousand gallons (223,000gal) per year, utilizing dripped irrigation on timers at an agronomic rate just after sunrise and/or sunset, and based upon seasonal tapering of need (Table 3).

Month	Propagation	Vegetating	Flowering	Cultivation	Processing	Projected Water Usage
Jan						0gal
Feb						0gal
Mar						0gal
Apr						5,500gal
May						15,000gal
Jun						33,000gal
Jul						52,000gal
Aug						57,500gal
Sep						45,000gal
Oct						15,000gal
Nov						0gal
Dec						0gal
Total	4 Months	4 Months	5 Months	2 Harvests	Twice	223,000gal

H. Power

There is no power available due to the remoteness of the project site. Operations shall require electricity for well pump, nursery lighting, greenhouse fans, and the processing facilities. The propagation greenhouses shall have high efficiency low wattage lights, to ensure an eighteen (18) hour photoperiod, and comply with CDFA regulations concerning immature plants. Flowering greenhouses for mature plants shall not have any kind of lighting in compliance with Humboldt County and CDFA regulations concerning outdoor cultivation. To meet these requirements an electrical system dependent upon an EPA Tier IV generator equal to or less than one hundred fifty kilowatts ($\leq 150\text{kw}$).

The project shall utilize the following Power:

1. **EPA Tier IV generator equal to or less than one hundred fifty kilowatts ($\leq 150\text{kw}$).**

The following are compliance requirements for Operations:

1. **Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install** the power system, pumps, batteries, switch box, conduit, outlets, and any other related electrical connections.
2. **Construction shall occur between April 15 and October 31.**
3. **Dark Sky Plan** shall be developed and implemented for propagation greenhouses.
 - a. All greenhouses shall utilize DEP covers.
 - b. All greenhouse lighting shall utilize timers.
 - c. A sunrise/sunset calendar shall be posted on-site.
 - d. Artificial lighting shall not be visible from outside of the greenhouses at night after sunset or before sunrise.
 - e. **Standard Operating Procedures that incorporate a Dark Sky Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all Humboldt County and State of California regulations.

I. Water Source & Irrigation

Past operations were dependent upon a Class III Stream diversion under water right S028038. In 2018 a Small Irrigation Water Use Registration was submitted to DWR and recorded as H504515. Due to nonviability of forbearance storage amount requirements the diversion shall be abandoned diversion in favor of a well.

In 2018 a well was attempted by Fisch Well Drilling which resulted in a dry hole. A new location 40.13580, -123.65182 was attempted under Humboldt County Permit 20/21-0669 and was successful with a two hundred fifty feet (250') deep well with an output of fifteen gallons per minute (15GPM) in June of 2021. This well has been registered with DWR under WCR2021-006870 and shall be used for cultivation with metering as required by SWB.

The project shall utilize the following Water Source:

1. **Stream Diversion S028038 from the unnamed Class III Stream located approximately at longitude 40.136543 and latitude-123.654413 shall be abandoned.**
2. **Well drilled under Humboldt County Permit 20/21-0669 registered with DWR 6.14.21 WCR2021-006870 shall be utilized for cultivation.**
 - a. Located at latitude 40.13580 and longitude -123.65182.
 - b. Well is two hundred fifty feet (250') deep well with an output of fifteen gallons per minute (15GPM).

The following are compliance requirements for Water and Irrigation:

1. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install the power system, pumps, switch box, conduit, outlets, and any other related electrical connections.***
2. State Water Board compliance with all measures identified within the ***WRPP/SMP shall be implemented including monthly use records kept.***
3. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.

J. Water Storage

Total estimated water use for operations are approximately two hundred twenty-three thousand gallons (223,000gal) per year. If the project was to go forward with a diversion, should the proposed well not be successful, would require more storage than estimated use to meet forbearance requirements. The proposed well would require less storage.

To minimize the potential of over drafting the proposed well sufficient hard storage shall be required. It is proposed that forty-five thousand gallons shall be dedicated for cultivation related uses. Irrigation water from the well shall be metered monthly and reported annually to the SWB. Operations shall utilize dripped or soaker hose irrigation on timers at an agronomic rate, just before sunrise and/or after sunset, and based upon seasonal tapering of need.

The project shall utilize the following Water Storage with a successful Well:

1. ***Forty-five thousand gallons (45,000gal) of hard poly water storage tanks.***
 - a. Thirty thousand gallons (30,000gal) as six (6) five thousand-gallon (5,000gal) tanks shall be for cultivation.
 - b. Five thousand-gallon (5,000gal) tank shall serve the processing facility.
 - c. Five thousand gallon (5,000gal) tank shall serve as a fertilizer mixing tank.

The following are compliance requirements for Water Storage:

1. ***Agricultural Exempt Permits*** shall be submitted to the Humboldt County Building Department for the water storage tanks.
2. State Water Board compliance with all measures identified within the ***WRPP/SMP shall be implemented.***
 - a. ***Installation of meter on the well*** which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.
 - b. ***Irrigation water shall be used at an agronomic rate consistent with the WRRP.***
3. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.

K. Fire Protection

CalFire State Responsibility Area (SRA) and Humboldt County Fire Safe Regulations provide a baseline of emergency access. Measures to meet regulatory requirements for employee and public safety shall include emergency access, wildfire water reserves; fire safety, and parcel vegetation modification. Standard protective fire measures shall also ensure the protection of employees such as the installation of building sprinkler systems, fire extinguishers, and smoke detectors. An Evacuation Plan shall be developed and employees annually trained to ensure overall operational protection.

The project shall utilize the following Fire Protection:

1. ***Five thousand gallon (5,000gal) hard storage tank shall be installed, not connected to the irrigation system, and used exclusively for fire protection on the parcel with a standard fire hydrant connection.***
2. ***Standard fire hydrant connections shall incorporate CalFire SRA:***
 - a. Hydrant shall have either a two and one-half inch (2½") or four and one-half inch(4½") N.H. male fitting for a fire house connection at least eighteen inches (18") above grade.
 - b. Three inch (3") reflectorized blue dot shall be installed upon the fire hydrant
 - c. The placement the fire hydrant connection shall be between four feet (4') and twelve feet (12') from the roadway.
 - d. Fire hydrant placement shall be at least fifty (50') from buildings and at least eight feet (8') from vegetation.
 - e. All fire hydrant connections shall be maintained for proper fit and function on an annual basis by the Alderpoint Fire Department.
3. ***The Fire Protection Plan shall incorporate the following:***
 - a. Buildings with F-1 or U Occupancy shall have internal fire sprinkler systems installed as required by law to protect the safety of employees.
 - b. Smoke detectors shall be installed and may be connected to a monitored security system.

- c. The processing and propagation facilities shall have at a minimum one (1) dry chemical fire extinguishers with a twenty-pound (20lb) capacity in each building.
- d. Fire extinguishers may also be installed within convenient locations accessible during working hours.
- e. Fire extinguishers shall be maintained and certified on an annual basis.
- f. Employees shall be trained in the use of fire extinguishers and evacuation plan.
- g. Property fuels reduction shall be implemented under a plan developed by a Qualified Forestry Professional.

The following are compliance requirements for Fire Protection:

1. ***CalFire State Responsibility Area Standards and Humboldt County Fire Safe Regulations shall be met at all times including, but not limited to permitting for new development, roads, driveways, gates, addressing, emergency fire water supply, maintenance.***

L. Roads

Operations shall require that roads are suitable for commercial agricultural use meeting the minimum of a Category 2 Road due to State and County law that requires privately owned driveways and roads meet minimum standards. The parcel is accessed from County maintained Alderpoint Road and is easily accessible via privately maintained Rancho Sequoia Drive. This Right-of-Way continues through the middle of the parcel and Northview Road veers off the southern side of the property. Collective road maintenance of the Right-of-Way to the parcel shall occur through participation in the Rancho Sequoia Road Association.

Humboldt County prefers a functional Category 4 Road Standard which are a minimum of two (2) lane twenty feet (20') wide, on a slope less than sixteen percent (>16%), with fifty feet (50') inside curve radius of curves, and turnarounds with forty feet (40') circle radius or forty feet (40') Slip-T. Should the physical landscape not allow for a two (2) lane road, then Humboldt County and CalFire Category 2 minimums standards shall be met, which are fourteen feet (14') wide roads with turnouts every four hundred feet (400'), dead-end turnarounds, and other contour requirements.

The plan incorporates a number of projects to meet County and State road standards. Rancho Sequoia Road is in disrepair, due to being a past logging road, which has since been converted to residential and cannabis cultivation access, and requires significant improvements including grading to two (2) culverts as required under the DFW 1600 Agreement. On-site parking shall occur in dedicated off-street locations. Parking shall be sufficient for peak employee use plus an additional ADA compliant stall. Dedicated parking areas shall be utilized so roadways are clear at all times for emergency vehicle access.

The project shall utilize the following for Roads:

1. *Rancho Sequoia Road shall, at a minimum meet a Category 2 roadway standard that functions as a Category 4 roadway, and/or full Category 4 standards, as designed by a licensed and qualified engineer.*
2. *All other road surfaces shall meet CalFire SRA requirements for a Category 2 roadway.*
3. *ADA-compliant parking stall shall be provided which is minimum eighteen feet by twenty feet (18'x20') on less than two percent (<2%) slope.*
4. *Standard off street parking areas measuring ten feet by twenty feet (10'x20').*
5. *All ROW entrances shall be to code requirements for approach and departure.*
6. *Gates shall have a three inch (3") red reflector on both sides.*
7. *A KNOX box located at the gate shall provide emergency vehicle access to the project site.*
8. *The driveway shall always be clear and accessible at all times.*

The following are compliance requirements for the Roads:

5. *Join the Rancho Sequoia Road Association and maintain membership while participating in private right of way access road upgrades from Alderpoint Road which is a positive cost-effective benefit to operations.*
6. *Meet all permitting requirements to work within a Class II Stream, including but not limited to Humboldt County, State, and Federal.*
7. *DFW §1600 LSA Compliance with all measures identified including, but not limited to, culvert and road upgrades, under permitting from all agencies.*
8. *State Water Board compliance with all measures identified within the Water Resources Protection Plan shall be implemented, including but not limited to, culvert and road upgrades.*
9. *Humboldt County and CalFire Category 2 road standards for the driveway as designed by a Licensed and Qualified Engineer.*
10. *Rancho Sequoia shall function as a Category 4 meeting the Category 2 Standards as designed by a Licensed and Qualified Engineer.*
11. *Dedicated ADA-compliant parking shall be provided separate from standard parking stalls.*
12. *A Licensed and qualified Engineer shall design a grading plan which shall be submitted to the Humboldt County Building Department.*
13. *Road construction shall be undertaken by a licensed and qualified contractor between April 15 to October 31.*
14. *Transportation Plan shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;*

- a. Shall incorporate a road maintenance plan to maintain compliance with road standards required by Humboldt County, CalFire, and SWB.
15. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
16. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
17. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

M. Cultivation and Soils

The project site shall bring the property into full regulatory compliance a total of eighteen thousand four hundred ninety-two square feet (18,492²) full sun DEP cannabis cultivation for commercial use. It is an "Agricultural Employer", as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with §1140) of Division 2 of the Labor Code, to the extent not prohibited by law. All development shall meet ADA compliance as required.

Cannabis cultivated is intended for the adult recreational market for flower and extraction which shall be grown to meet that demand. Product shall either be minimally processed as dried plant material conveyed by the farmer to an extraction facility or distributor for packaging, or, as fresh frozen collected by the extractor who shall be on-site during harvest with material transport. Operations shall meet all local and state regulatory requirements.

Operations shall be moved to the 3 acre timber conversion area. The purpose is to remove high intensity cultivation located close in-between Powers Creek and the Class III Stream to an environmentally superior area further away with less slope where commercial operations are appropriate. This relocation shall require a remediation of the old cultivation site.

Greenhouses are intended to be permanent buildings outside of the Ordinance 2559 Section 2 314-55.4.11(d) thirty feet (30') setback from the property. These structures are shall be "Agricultural Exempt" which require they not actively being heated or air conditioned. Though, if climate control is installed then a fully engineered plan for "U Occupancy" is required under permit.

Greenhouses shall be constructed upon native soils with cultivation occurring within raised beds. Protection from overuse of inputs and reuse of these soils shall be a key component of operations. All farming shall be certified organic with mixing, tilling, and amending of soils occurring within the raised beds.

All fertilizers shall be storage in designated areas as recommended by the manufacturer. Soils shall be reused, composted in a secure area with chipped cannabis

waste, and no dumping off-site shall occur. Cover crops shall be utilized when not in cultivation for a month or more to reduce soils loss. Straw and other erosion control methods shall be placed on the ground surrounding the cultivation areas.

The Project Site shall implement water conservation and soils management for the benefit of the business, community, watershed, and fishery. Environmentally friendly good neighbor policies shall be developed and implemented. Best management practices (BMP) to protect the watershed from operations shall be undertaken to the most extent possible.

The following operational BMPs shall be implemented:

1. All farming shall be certified organic.
2. A nitrogen plan shall be developed and implemented to prevent subsurface nutrient release with the assistance of a licensed soil scientist or other qualified professional.
3. Operational use of water shall be metered and recorded as required by the State Water Board.
4. A detailed monthly schedule of watering activities shall be developed and conspicuously posted on-site.
5. Overuse of outside inputs shall be minimized.
6. All fertilizers shall be storage in designated areas as recommended by the manufacturer.
7. All cultivation shall within greenhouses with either raised beds or air pots.
8. Reuse of soils and composting shall be a key component of operations.
9. Composting shall consist of a dedicated area and cannabis waste shall be chipped into an inconsumable humic mix with other organic waste.
10. Soils and organic waste shall be reused, composted on-site, and no organic waste shall be dumped off site.
11. Mixing, tilling, and amending of soils shall occur within the compost area or within enclosed greenhouses.
12. All bare soils shall be covered soils with straw, ground cloth, or cover crop.
13. Straw and other erosion control methods shall be placed on the ground surrounding the cultivation areas.
14. Operations shall utilize drip irrigation controlled by a timer.
15. Other methods of soil and plant moisture analysis may be implemented including the use of hygrometers, infrared cameras, and computerized sensors.

The project shall utilize the following Cultivation Area:

1. ***Eighteen thousand four hundred ninety-two square feet (18,492²) full sun outdoor DEP relocated to the 3-acre conversion site.***
 - a. Fourteen (14) one thousand two hundred square feet (1,200²) Ag Exempt twelve feet by one hundred feet (12'x100') greenhouses totaling sixteen thousand eight hundred square feet (16800²).

- b. Nine hundred sixty square feet (960¹²) Ag Exempt twelve feet by eighty feet (12'x80') greenhouse.
- c. Seven hundred thirty-two square feet (732¹²) Ag Exempt twelve feet by sixty feet (12'x60') greenhouse.
- 2. ***Eight feet by twenty feet (8'x20') shipping container for fertilizer storage.***
- 3. ***All greenhouses shall meet the following requirements:***
 - a. Be wired by a Licensed Electrician under permit.
 - b. Not be air conditioned or actively heated.
 - c. Not be lighted.
 - d. Utilize electrical ventilation fans.
 - e. Utilize timers for fans.
 - f. Utilize Light Deprivation (DEP) covers.

The following are compliance requirements for the Cultivation Area:

- 1. ***Agricultural Exempt Permits*** shall be submitted to the Humboldt County Building Department for the greenhouses and fertilizer storage sheds.
- 2. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install*** the power system, pumps, switch box, conduit, outlets, and any other related electrical connections.
- 3. Greenhouse **construction shall occur after April 15** as required by Humboldt County Building Department.
- 4. ***Less Than 3-Acre Conversion After-the-Fact Evaluation shall be performed by a Qualified Professional, such as a Registered Forestry Professional or Licensed Biologist.***
- 5. State Water Board compliance with all measures identified within the ***Water Resources Protection Plan shall be implemented.***
- 6. ***Dark Sky Plan*** shall be developed and implemented.
 - a. Greenhouses shall utilize DEP covers.
 - b. Nursery lighting shall utilize timers.
 - c. A sunrise/sunset calendar shall be posted on-site.
 - d. Artificial lighting shall not be visible from outside of the nurseries at night after sunset or before sunrise.
 - e. ***Standard Operating Procedures that incorporate a Dark Sky Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all Humboldt County and State of California regulations.
- 7. ***Initial Statement of Diversion and Use*** shall be submitted to the SWCB DWR.
- 8. ***Track & Trace*** in accordance with the policies of County of Humboldt and State of California.
 - a. Unique Identifier Designations (UID) are required for each mature plant.
 - b. A unique harvest batch name shall be created and associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
 - c. UIDs shall be attached to the main stem and placed in a position so it is visible within clear view standing next to a mature plant.

- d. UIDs shall be kept free from dirt and debris.
 - e. UIDS are prohibited from being removed from the mature plant to which it was attached and assigned until the plant is harvested, destroyed or disposed.
 - f. Cannabis plants maintained outside of the designated Cultivation Area are prohibited from flowering. Should plants outside of the canopy area(s) begin to flower, a UID shall be applied, the plants shall be moved to the designated Cultivation Area without delay and reported in the Track-and-Trace system.
9. **Fertilizers shall be stored in designated areas and maintained per manufacturer recommendations.**
 10. **Nitrogen Management Plan shall be developed by a Qualified Professional**, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County, State of California, and Federal regulations.
 11. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
 12. **Pesticide Management Plan** shall be developed by a Qualified Professional, with training for **Private Applicator Certification**, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
 13. **Private Applicator Certification** shall be undertaken with the Humboldt County Agricultural Commissioner.
 14. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 15. **Humboldt County and CalFire road standards shall be met.**
 16. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
 17. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 18. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 19. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

N. Propagation Nursery

Cultivation shall be supported by two (2) on-site Appurtenant Nursery for Propagation equal to one thousand eight hundred square feet (1,800’²). Propagation activities shall occur separately where only immature plants maintained outside of the canopy area. Power sources shall be developed for pumps, fans, lights, and electrical. All development shall meet Humboldt County Building Code and California Electrical Code.

The project shall utilize the following Appurtenant Nursery Area:

1. ***Two greenhouses equal to (2) one thousand eight hundred square foot (1,800'²) twelve feet for appurtenant propagation nurseries.***
 - a. Twenty feet by fifty feet (20'x50') greenhouse equal to one thousand square feet (1,000'²).
 - b. Twenty feet by forty feet (20'x40') greenhouse equal to eight hundred square feet (800'²).
2. ***Nursery greenhouses shall be built to meet one of the following requirements:***
 - a. **Ag Exempt; or,**
 - i. Not be actively heated or air conditioned.
 - b. **F-1 Commercial**
 - i. Actively heated and/or air conditioned.
 - ii. ADA Compliant
 - iii. Fire suppression system.
 - iv. Requires engineered plan and Building Permit.

All compliance requirements as listed for the Cultivation Area are applicable to the Appurtenant Nursery Area.

O. Processing Facility

Operations shall be done by employees overseen by management. Staff shall cultivate within greenhouses with a dual season harvest utilizing full sun DEP. The cultivation is intended to be for flowers which are dried, trimmed, and packaged or to be sent manufacturing in bulk. To meet liability, health, and safety requirements for employees and product, processing shall occur within a dedicated facility which meets County minimums standards.

All processing, including drying, trimming, packing, and storage shall occur on-site within a two-story building built to F-1 Code standards with ADA access for employee use powered by the Tier 4 generator. Potable water for the facility shall be provided via faucets from the well. Outside of the processing facility shall be an ADA restroom connected to a permitted septic system.

Facilities shall be serviced with dedicated parking that includes ADA access and additional off-street parking during peak season. All parking shall be separate of the driveway which shall be clear and accessible at all times for emergency access. All development shall meet Humboldt County Building Code and California Codes

The project shall utilize the following for Processing:

1. ***One thousand two hundred square feet (1,200'²) two-story thirty feet by forty feet (30'x40') structure built to F-1 Codes for employee use serviced by a four feet (4') wide ADA walkway.***
2. ***Sixty-four square feet (64'²) ADA compliant restroom eight feet by eight feet (8'x8')***

3. **Single ADA Van Accessible parking stall measuring a minimum of fourteen feet by eighteen feet (14'x18') on a slope less than two percent (<2%).**
4. **Four (4) standard parking stalls measuring a minimum of ten feet by eighteen feet (10'x18').**

The following are compliance requirements for the Processing Facility:

1. **Building Permits shall be submitted to the Humboldt County Building Department for all new construction including an ADA compliant restroom with septic system.**
2. **Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall determine electrical needs and install the power system, switch box, conduit, and any other related electrical connections.**
3. **Licensed Engineer shall perform a Humboldt County Road Evaluation Report.** Should grading of over fifty yards (<50yd) of material or be located on a slope greater than fifteen percent (<15%) then the following applies:
 - a. Grading plan for internal roads which shall be designed by a licensed and qualified engineer to meet a minimum Category 2 Road Standard.
 - b. Grading permit shall be submitted to the Humboldt County Building Department.
 - c. Road construction shall be undertaken by a licensed and qualified contractor between April 15 to October 31.
4. **Drinking water shall be provided by the permitted well.**
5. **Perk test of soils to determine viability and installation of a permitted ADA-compliant restroom with septic system to meet human wastewater needs for a commercial operation.**
6. **Track & Trace** in accordance with the policies of County of Humboldt and State of California.
7. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
8. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations. Additionally, this plan shall incorporate:
 - a. Processed and dried cannabis procedure for weighing, packaging, labeling, and deposited in accordance with all applicable County of Humboldt and State of California requirements.
 - b. All work surfaces and equipment maintained in a clean and sanitary condition in accordance with all applicable County of Humboldt and State of California requirements.

- c. Prevention practices against the contamination or growth of E.coli, mold, mildew, or other microbiological agent upon or within processed cannabis.
 - d. Nitrile gloves and paper facemasks shall be used at all times.
 - e. Hygiene policies for the use and maintenance of face and hand protection equipment in good operable condition.
 - f. Hands washing methods policies to minimize activities which may introduce contamination.
9. **Humboldt County and CalFire Category 2 road standards shall be met.**
 10. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
 - b. Shall incorporate a road maintenance plan to maintain compliance with road standards required by Humboldt County, CalFire, and SWB.
 11. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 12. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
 13. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

P. Solid and Organic Waste Plan

An Integrated Waste Management Plan to control cannabis and solid waste shall be implemented through use of a Cannabis Waste Management Plan (CWMP). The State of California and Humboldt County require that the project be in compliance with the California Integrated Waste Management Act through the use of a CWMP. Due to project site remoteness the CWMP shall utilize on-site composting and self-haul of solid waste and recycling.

All cannabis waste shall be stored in a secure waste receptacle, or secured area, and disposed of in accordance with local and state regulations as found within the CWMP. Public access to the designated cannabis waste receptacle or area shall be strictly prohibited. Cannabis waste shall be chipped and disposed of in a static aerated or windrow compost pile (Figure 7).

All commercial solid waste shall be stored separately from cannabis waste in disposal bins secure from wildlife and watershed discharge. Trash and recyclables shall be separated and disposed in accordance local and state regulations as found within the CWMP. All hazardous waste regulated by the CA Integrated Pest Management Plan shall be disposed of properly utilizing protocols in compliance with all local and state regulations as found within the CWMP.

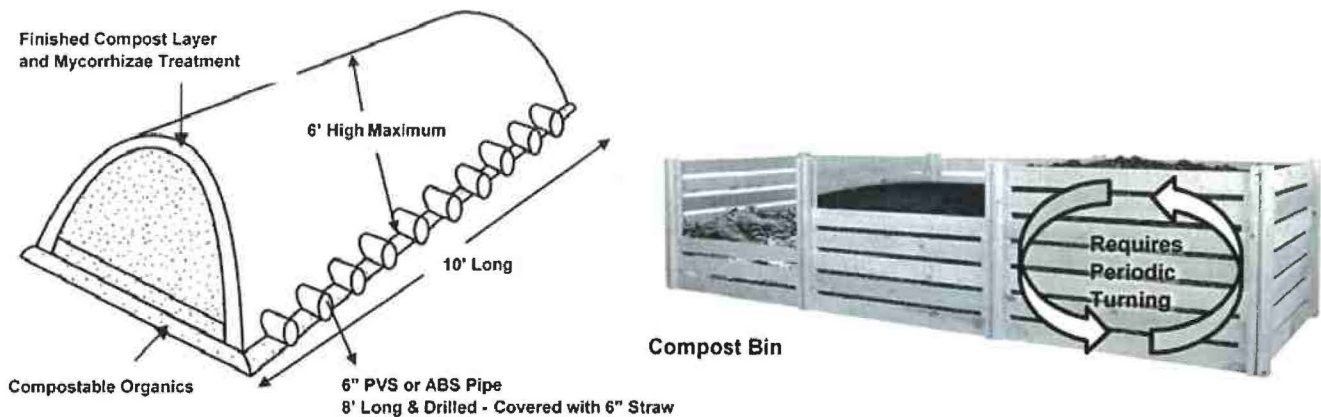


Figure 7: Static Aerated and Windrow Compost Piles Example

The following are compliance requirements for Solid Waste Management:

1. ***Cannabis Waste Management Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
2. ***Installation of a Static Aerated Compost Pile and/or Windrow Compost.***
3. State Water Board compliance with all measures identified within the ***Water Resources Protection Plan (WRPP)*** shall be implemented.
4. ***Track & Trace*** in accordance with the policies of County of Humboldt and State of California.
5. ***Hazardous Materials Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County, State of California, and Federal regulations.
6. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
7. ***Transportation Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
8. ***Receiving and Inventory Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
9. ***Processing and Packaging Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
10. ***Security Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

IV. Site Drainage, Runoff, and Erosion Control Measures

A. Site Drainage

The Project Site is located on the eastern slope of the Steelhead Creek which flows directly into the Eel River. The parcel has been harvested for timber repeatedly in the past, used for cannabis cultivation, and is typical of the mountainous regions of Humboldt. Cultivation operations are proposed on fairly natural flats with the closest cultivation area just over fifty feet (50') from a Class III Stream which drains to Steelhead Creek.

B. Runoff and Erosion Control Measures

The project shall minimize discharge to the watershed and anadromous fisheries. The following erosion control measures are proposed to be implemented:

1. All roads on the parcel shall meet Category 2 Road Standards.
2. All measures of the Water Resources Protection Plan shall be implemented;
3. Road surfaces shall be graveled.
4. Training by environmental/farm professionals to further develop internal policies to minimize impacts by from farm related activities.
5. All cultivation shall utilize the raised beds and in the ground soils through amending and permaculture methods.
6. Outdoor soil beds shall be in ground, contained, and methods implemented to minimize soils loss.
7. Cover crops such as clover, straw, or ground cloth shall be utilized on all bare soils; and,

C. Watershed and Nearby Habitat Protection

The project shall ensure protection of the watershed and nearby habitat:

1. All roads on the parcel shall meet Category 2 Road Standards.
2. All measures of the Water Resources Protection Plan shall be implemented
3. Graveling of the driveway.
4. Training by environmental and farm professionals to further develop internal policies to minimize impacts by from farm related activities.
5. All outdoor cultivation shall utilize the in the ground soils through amending and permaculture methods.
6. Raised beds shall be contained within greenhouses.
7. All farming shall be certified organic.
8. A locked six-foot (6') perimeter fence may be installed around the cultivation area to minimize wildlife exposure.
9. Greenhouses shall have doors to minimize wildlife exposure.
10. All enclosures shall have locking doors.
11. Compost shall be covered and secure.
12. Trash bins shall be secured from wildlife.
13. Cover crops such as clover, straw, or ground cloth shall be utilized on all bare soils.

D. Soil Management and/or Permaculture Methods.

The project shall protect from the overuse of nutrients as a key component of their business. Operations shall manage on-site soils through the following means:

1. All measures of the Water Resources Protection Plan shall be implemented.
2. A nitrogen management plan developed by a licensed soil scientist.
3. All cultivation shall utilize the on-site prime agricultural soils through amending and permaculture methods.
4. All farming shall be certified organic.
5. Mixing, tilling, and amending of outdoor cultivation soils shall occur within the soils used for cultivation.
6. Raised beds shall be contained within greenhouses with amending occurring within the beds.
7. Soils and vegetated matter shall be reused, composted on-site, and no dumping off-site shall occur.
8. Composting shall consist of a dedicated area and vegetated matter shall be chipped into an inconsumable humic mix.
9. Cover crops such as clover, straw, or ground cloth shall be utilized on all bare soils.

V. Fertilizers, Pesticides, or Other Regulated Products

A. Storage Protocols

The project intends to be a certified organic farm. Operations shall not be using regulated products, such as pesticides or herbicides, unless allowable by the SWB and CDFA. The following are fertilizer storage protocols:

1. All measures of the Water Resources Protection Plan shall be implemented;
2. Storage of all fertilizers or other regulated and nonregulated organic products shall be according to manufacturer requirements;
3. A permanent storage shed on a foundation shall provide shelf and floor space for products to be stored according to manufacturer requirements;
4. Clean-up and containment protocols shall be developed and implemented to minimize discharge;
5. Clean-up and containment equipment shall be maintained in good operating condition on-site at all times; and,
6. Safe handling practices and protocols for using clean-up and containment equipment shall be developed and posted conspicuously.

B. Fertilizers and Amendments

The project may utilize any or all of the following certified organic amendments and fertilizers in Table 4.

Table 4: Organic Soil Fertilizers and Amendments		
1. Bat Guano	6. Fishbone	11. MycoApply Endo Ultra *
2. Bone Meal	7. Grape Compost	13. Neem Meal
3. Cascade Worm Castings	8. Gypsum	14. Phytamin Fish 3-2-0*
4. Crab Shell	9. Kelp Meal	15. Seabird Guano
5. Epsom Salt	10. Kickstart 6-1-2*	16. Shrimp Meal
*Organic Material Review Institute listed and California Department of Food & Agriculture registered organic input material.		

C. Pesticides

The project may require pest management requiring the potential use of any the following agriculturally exempt products in Table 5.

Table 5: Legal Pest Management Practices	
Active Ingredient	Pest or Disease
Azadirachtin	Aphids, Whiteflies, Fungus Gnats, Leafminers, Cutworms
Bacillus subtilis QST	Root Diseases, Powdery Mildew
Bacillus thuringiensis subsp. aizawai or kurstaki	Moth Larvae (E.G., Cutworms, Budworms, Borer)
Bacillus thuringiensis subsp. israelensis	Fly Larvae (E.G., Fungus Gnats)
Beauveria bassiana	Whiteflies, Aphids, Thrips
Cinnamon oil	Whiteflies
Gliocladium virens	Root Diseases
Horticultural Oils (Petroleum Oil)	Mites, Aphids, Whiteflies, Thrips; Powdery Mildew
Insecticidal Soaps (Potassium Salts of Fatty Acids)	Aphids, Whiteflies, Cutworms, Budworms
Iron phosphate, sodium ferric EDTA	Slugs And Snails
Neem Oil	Mites; Powdery Mildew
Potassium bicarbonate; sodium bicarbonate	Powdery Mildew
Predatory nematodes	Fungus Gnats
Rosemary + peppermint essential oils	Whiteflies
Sulfur	Mites, Flea Beetles
Trichoderma harzianum	Root Diseases
Active ingredients that are exempt from residue tolerance requirements and either exempt from registration requirements or registered for a use broad enough to include use on marijuana. http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/cannabis_enfrmnt/pest_mgmt_practices.pdf	

VI. Operations and Safety Practices

A. Agricultural Employer Statement

The project shall be an "agricultural employer", as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with §1140) of Division 2 of the Labor Code, to the extent not prohibited by law.

B. Safety Practices

Operations and processing operations shall implement safety protocols to protect the health and safety of employees, with adequate safety training relevant to their specific job functions, which include:

1. Drinking water and wastewater
 - a. Potable water shall be provided by the permitted well.
 - b. ADA bathroom within the processing facilities shall be developed connected to a permitted on-site septic system.
2. Emergency action response planning.
 - a. Training and certification in basic CPR & 1st Aid.
 - b. A CPR & 1st Aid Kit Station shall be provided within the processing facilities.
 - c. An emergency response plan shall be designed and implemented.
 - d. A monitored security and active video camera system may be installed.
3. Fire prevention.
 - h. Fire suppression tanks shall be monitored for water level and topped off on a monthly basis if necessary.
 - i. All fire hydrant connections shall be maintained for proper fit and function.
 - j. Smoke detectors shall be installed and may be connected with a monitored security system.
 - k. The appurtenant drying and/or processing facilities shall have at a minimum one (1) dry chemical fire extinguishers with a twenty-pound (20lb) capacity in each building.
 - l. Fire extinguishers may also be installed within convenient locations accessible during working hours.
 - m. Fire extinguishers shall be maintained and certified on an annual basis.
4. Hazard communication policies, including maintenance of material safety data sheets (MSDS).
 - a. Pesticide Management Plan shall be developed.
 - b. Private Applicator Certification and a written copy of the plan and certification shall be on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
 - c. MSDS of all pesticides used shall be on premises at all times.
 - d. A pesticides management plan shall be on premises at all times.
 - e. Training in the proper handling of all hazardous materials, if any are ever used.

- f. If any regulated substances are ever used, MSDS of any applicable hazardous materials shall be posted visibly on-site at all times.
- 5. Materials handling policies.
 - a. Training in the handling of cannabis and other related on-site materials shall occur on an annual basis.
 - b. All Track and Trace requirements shall be implemented.
 - c. A transportation plan shall be developed and implemented.
 - d. Standard Operating Procedures shall be developed and implemented.
- 6. Job hazard analyses.
 - a. Risks assessment audit shall be implemented and activities modified to reduce job hazards.
- 7. Personal protective equipment policies; including respiratory protection.
 - a. Certified safety glasses (tinted and clear), hats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection may be on-site and used.
 - b. Training in the use, expectations, and access to personal protective equipment.

VII. Processing Practices and Plan

A. Processing Practices

The project shall implement and practice the following Processing Practices on-site at all times:

- 1. All work surfaces and equipment shall be maintained in a clean and sanitary condition;
- 2. Prevention against contamination, mold, and mildew growth on processed cannabis;
- 3. Facemasks and gloves shall be in good operable condition; and,
- 4. Hands shall be sufficiently clean when handling cannabis or use gloves.

B. Processing Plan

The project's processing plan of cultivated cannabis consists of:

- 1. Harvesting cannabis shall occur twice (2) a year.
- 2. Drying of harvested cannabis shall occur within processing facilities.
- 3. Processed within the facilities utilizing a mechanical trimmer or hand trimmed, weighed, packaged, labeled, and distributed to licensed dispensaries or distributors, as allowable under California law, and shall adapt as changes occur.

VIII. Security Plan

Operations are intended to be conducted securely. At all times shall operations be visibly obscured, discreet, nor draw attention. The purpose of operational security is to avoid being a nuisance activity which could attract burglary, robbery, or diversion of cannabis for unlawful use.

The following are Security Measures:

- A. Operations shall be secured behind a gated road with KNOX Box access.
- B. There may be a fence at least six feet (6') in height with a locking gate utilizing a commercial grade lock around the cultivations areas.
 - 1. Fencing over six feet (<6') shall require a Humboldt County Building Permit.
- C. Internet monitored security and fire system may be installed, if feasible, and accessible only to permitted individuals on the premises.
- D. Digital video surveillance system, if feasible, with 1280×720 resolution connected through the internet 24/7 to a licensed alarm monitoring company.
- E. Passive audible trespasser alarm system may be installed.
- F. Cameras may be installed.
- G. Video recording system shall be installed within the processing facilities, if self-transporting, as per California Bureau of Cannabis Control regulations.
 - 1. Permanently mounted in a fixed location as noted on licensing site map.
 - 2. Pointed at all entry and exit access points from both inside and outside.
 - 3. Record within twenty feet (20') of those access points.
 - 4. Spaces where cannabis products are weighed, packed, stored, loaded/unloaded for transportation, prepared, or moved within the premises.
 - 5. Rooms in which surveillance system storage or recordings are kept.
- H. Locks shall be installed.
 - 1. Commercial-grade, non-residential door locks at all points of entry and exit.
 - 2. It is recommended that alarmed lock systems be considered to ensure restricted access.
- I. Any security personnel employed must possess a valid Guard Card and be compliant with the California Department of Consumer Affairs.

The following are compliance requirements for Security:

- A. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install*** the solar power system, switch box, conduit, and any other related electrical connections.
- B. ***Track & Trace*** in accordance with the policies of County of Humboldt and State of California.
- C. ***Cannabis Waste Management Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- D. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
- E. ***Transportation Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
- F. ***Receiving and Inventory Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

- G. **Processing and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
- H. **Security Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.