

Three Creeks Holdings LLC

APN: 522-032-011 | HCPB APPS# 13160 | WDID: 1_12CC401971



CULTIVATION & OPERATIONS PLAN

prepared for:

Humboldt County Planning Department

Application under Ordinance No. 2559

•Revision Date: 8/31/21•

~prepared by Verdant Bridge Enterprises~

STATEMENT OF RELEVANCE AND COHESION TO PREVIOUS VERSION(S):

Please be advised that as this is a living document, operational changes may have occurred since the initial Cultivation & Operations Plan was submitted. As such, and because the requirements from multiple governing agencies have evolved over time, there may be inconsistencies in format and/or content of the Cultivation & Operations Plan on file when compared to other submitted documents. Because this application was initially submitted under a previous version of the Ordinance, the cultivation plan is constantly being updated to accurately encompass all aspects as required by the current County Ordinance and will be submitted as necessary.

Cultivation and Operations Plan

TABLE OF CONTENTS

1. PROJECT OVERVIEW	Page 3
1.1. Project Summary & Site Location	Page 3
1.2. Right to Occupy & Company Members	Page 3
1.3. Regulatory Agencies and Compliance Status	Page 4
1.3.1. Humboldt County Building Department	Page 4
1.3.2. CA Dept. of Fish & Wildlife (CDFW)	Page 5
1.3.3. State Water Resources Control Board	Page 5
1.3.4. CalFire & SRA Requirements	Page 5
1.4. "Pre-existing" Cultivation & Area Verification	Page 5
2. OPERATIONAL PROCEDURES	Page 6
2.1. Seasonal Schedule of Activities	Page 6
2.2. Greenhouses & Other Operational Structures	Page 7
2.3. Propagation & Transplant Protocols	Page 8
2.4. Nutrient/Amendment Protocols & Storage	Page 9
2.5. Harvest, Drying & Processing	Page 10
2.6. Staffing Requirements & Employee Safety Policies	Page 10
2.7. Security Plan and Hours of Operation	Page 11
3. ENVIRONMENTAL CONSERVATION	Page 11
3.1. Water Source and Storage	Page 11
3.2. Irrigation Plan & Projected Water Use	Page 12
3.3. Watershed and Habitat Protection	Page 12
3.4. Energy and Generator Usage	Page 12
3.5. Lighting & International Dark Sky Standards	Page 13
3.6. Use and Storage of Pesticides	Page 13
3.7. Use and Storage of Fuels & Other Regulated Products	Page 14
3.8. Waste Management Plan	Page 15
3.9. Soil Management Plan	Page 15
3.10. Wastewater Disposal System	Page 15
Addendum #A: Timber Conversion	Page 17
Addendum #B: Restoration & Relocation	Page 19

Cultivation and Operations Plan

1. PROJECT OVERVIEW

1.1. Project Summary & Site Location

The project requires a Conditional Use Permit for a pre-existing cultivation footprint of 20,000 sq. ft. in a combination of Mixed Light and Outdoor planting. In order to conform to reasonable state licensing types, the project description sought for approval is 10,000 sq. ft. of Outdoor and 10,000 sq. ft. of Mixed Light cultivation, which translates to Small Outdoor and Small Mixed Light Tier 1 licensing through Cdfa. This project previously was issued an Interim Permit through HCPB for 9,710 sq. ft. of Outdoor and 10,890 sq. ft. of Mixed Light cultivation. Please see Section 1.4 for more information about the county's CAV (Cultivation Area Verification) report, site changes, and other details on how the final proposed footprint has been calculated in conformance to local and state regulations.

As stated below in Section 2.1, the operation generally produces two harvest cycles per season of Mixed Light cultivation and one harvest cycle of Outdoor cultivation.

The property is a 200-acre parcel (assessed at 203.50, shown on GIS as 200.07 acres) located within the Lower Trinity watershed near Supply Creek, approximately 6.5 miles west of Willow Creek, in an unincorporated area of northeastern Humboldt County. Access to the parcel is from Cloud Crossing Road off of Old Three Creeks Road from Highway 299. More information about parcel access roads can be found in the Road Evaluation Report that was created for an unassociated project on APN 522-022-015 which is at the end of Old Three Creeks Road and prepared by Supply Creek Landowner's Association and previously submitted to the Humboldt County Planning Department for this application.

The parcel sits at an elevation of just over 4000 feet and is zoned TPZ with a General Plan designation of T. The site currently has no postal address, but a Street Address Application was submitted to the Planning Department via email on 8/11/21, and the \$80 fee was paid by J. Klawitter on 8/27/21.

According to current GIS data, the parcel contains no Prime Ag soils. The general slopes across the parcel range from gentle to moderate (more info on Plot Plan, included as Appendix A). Parcels surrounding the property are listed as either "Improved TPZ" or "TPZ - Vacant" on Humboldt GIS and are also "T" under the current General Plan. The cultivation areas are all over 235 feet from the nearest property boundaries, well over the 30-foot SRA property line setback regulation.

1.2. Right to Occupy and Company Members

The property is owned by Three Creeks Holdings LLC and the Grant Deed dated 3/21/18 has been previously submitted for this application. Three Creeks Holdings LLC is jointly held by Stanek Trust, Klawitter Trust, and Allison Schurman. Joseph Klawitter is one of the managing members of the LLC and is the owner/operator of the cultivation operation at the APN associated with this project and can legally sign on behalf of the LLC.

Cultivation and Operations Plan

1.3. Regulatory Agencies and Compliance Status

Three Creeks Holdings LLC is committed to becoming fully compliant with all local and state cultivation regulations. We realize that in this burgeoning industry there are many laws and/or agencies that have not yet fully come into play, as well as frequent alterations to existing regulations. As such, we are dedicated to remaining in good standing with all regulatory departments and guidelines through this integrational period.

The following sections (1.3.1.-1.3.4.) outline compliance status and progress with some of the main regulatory agencies as of the fall of 2021. As this is a living document, the information contained herein will change as time passes, our operation matures, and as the regulatory process evolves.

1.3.1. Humboldt County Building Department

We understand that in addition to any proposed structures or developments, all pre-existing structures with a nexus to the cannabis operations will need to be retroactively permitted. Three Creeks Holdings LLC has enlisted the help of Omsberg & Preston, Engineers to oversee the process of attaining any building, septic, and/or grading permits that may be necessary to achieve initial and/or conditional approval of our cannabis permit from the County of Humboldt.

There are five greenhouse structures made of lumber and either steel frames or PVC piping in which our Mixed Light Cultivation occurs. There is one 20' x 100' nursery greenhouse with a 20' x 17.5' sectioned-off entryway for worker/equipment sanitation and propagation supply, leaving 20' x 82.5' feet of nursery/propagation space. Please see Plot Plan and Section 2.2 and 2.3 of this document for more details on greenhouses.

Ancillary buildings on the property are as follows:

- A 30' x 50' two-story barn (previous location of Mixed Light cultivation)
- A 24' x 50' concrete slab (previous location of Mixed Light cultivation)
- Two 8' x 20' shipping containers "sea crates" for storage
- Two 8' x 40' shipping containers "sea crates" for storage
- A 10' x 20' shed for ag storage
- A 30' yurt - community area (currently not in use)
- A 10' x 10' generator and fuel cell containment shed with lumber walls and roof
- A 4' x 4' generator and fuel can containment shed with lumber floor and roof

There are also two historical outhouses/shower facilities that will be decommissioned upon approval. All necessary permits & deconstruction protocols will be followed and oversight will be provided by Omsberg & Preston, Engineers as well as NRM Corp. of Eureka to ensure regulatory compliance and environmental protection during that process.

Cultivation and Operations Plan

1.3.2. CA Dept. of Fish & Wildlife (CDFW)

An LSAA application was prepared by Kristin Klawitter and submitted to CDFW on 11/22/19. An amended application was prepared and submitted by NRM Corp. of Eureka on 4/9/21. The 1600 project points addressed within the LSAA are three culvert crossings that need improvement/replacement. The final signed draft of the CDFW LSAA will be submitted with this document to the county planner. NRM is in active communication with CDFW regarding this project and all relevant documents and correspondence regarding CDFW compliance are kept on file at their office in Eureka.

1.3.3. State Water Resources Control Board (SWRCB)

An application (#432799) for enrollment was submitted by NRM Corp. for this project under the Statewide Cannabis Order WQ 2017-0023-DWQ as Tier 2 on 2/25/21. After this was submitted, it came to light that the property had previously been enrolled and an NOA had been issued on 8/30/18. The property also had been enrolled under the Regional Water Board Order R1-2015-0023 under WDID# 1B171513CHUM.

The Notice of Applicability from the State Water Quality Control Board dated 8/30/18 will be submitted to the county planner overseeing this project along with this Cultivation & Operations Plan. Because the water source is a permitted groundwater well, no SIUR filing or additional enrollment under the Division of Water Rights is necessary. NRM has all relevant documentation and correspondence regarding State Water Board Enrollment on file at their office in Eureka.

1.3.4. CalFire SRA Requirements

According to the Humboldt County Web GIS, the property is not located within a State Responsibility Area (SRA) for fire protection, although we believe this is a classification error. A 2,500-gallon water tank is proposed to store water specifically for fire suppression purposes. Please see Plot Plan for the proposed tank location. No improvements are needed in order to meet SRA requirements, there are designated turnarounds and pull-out areas for emergency vehicles at each cultivation site as well as ongoing management of trees and ladder-fuel vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the required 30-foot SRA setback from property lines. No trees or vegetation will be removed without the guidance and oversight of a licensed forester along with any/all applicable permits required.

1.4. "Pre-Existing" Cultivation & Cultivation Types

The original application filed for this APN asked approval for A CAV (Cultivation Area Verification) Report was run by county staff on 3/22/18, which measured 7,050 sq. ft. of full-term Outdoor cultivation and 13,550 sq. ft. of Mixed-Light cultivation based on aerial images from Terraserver in 2015. This established a total footprint of 20,600 sq. ft. of pre-existing cultivation prior to Jan. 1, 2016. in conformance with HCPB "1.0" applications.

Cultivation and Operations Plan

An Interim Permit was issued on Aug. 28, 2018, for 9,710 sq. ft. of Outdoor and 10,890 sq. ft. of Mixed Light cultivation. In order to remain within the "Small" licensing tier with CDFA, Three Creeks Holdings LLC is adjusting the project description to an even 10,000 sq. ft. of Outdoor and 10,000 sq. ft. of Mixed-Light cultivation.

In order to accomplish this, former outdoor (full-term) cultivation that took place in a small "guerrilla" area in the middle of the property, as well as pre-existing mixed-light from the barn and concrete slab next to the barn, are all being relocated to an environmentally suitable area (labeled as "Site A") on the Plot Plan in the permitted Less Than 3 Acre Conversion that was created in 2013. The mixed-light portion is being converted to full-term outdoor cultivation and will take place within an area that previously held full-term cultivation, but did not show up clearly in the few satellite images that were available in 2015 via Terraserver and Google Earth.

Because in reality there was much more pre-existing cultivation than the CAV was able to properly identify, in order to get the pre-existing footprint for mixed-light cultivation down to 10,000 sq. ft., Three Creeks Holdings LLC is repurposing a 20.67' x 48' raised planter bed into a vegetable garden for domestic use, as removing the bed itself would be environmentally damaging. As stated elsewhere in this document, the greenhouse walls and planter beds were sunk approximately six feet into the rocky ground when constructed, and removal would require an exorbitant amount of time, money, and effort, including but not limited to the use of heavy equipment and implementation of extreme erosion control measures. The vegetable bed will remain uncovered during the year and no cannabis will be grown there, only fruits and vegetables, flowers for beneficial insects, and pest-deterrent plants (such as marigolds, rosemary, thyme, and many other edible culinary herbs).

Finally, one of the pre-existing 20' x 100' sq. ft. greenhouses in the northern site will become the main nursery area, which contains a 20' x 17.5' entryway/antechamber which serves as a sanitation area for boot & tool washing, clean clothing, and storage of propagation supplies to prevent cross-contamination of young, delicate plants in the early stages of immaturity. The nursery area dimensions within this converted greenhouse are 20' x 82.5' as shown on the Plot Plan. Please see Section 2.3 for more information on propagation and transplant protocols.

2. OPERATIONAL PROCEDURES

2.1. Seasonal Schedule of Activities (Two Mixed-Light Cycles & One Outdoor Cycle per Year)

March -April

- Season begins: site preparation, maintenance of water lines, tilling in cover crops, or amending of soil for the season as needed
- Property maintenance as the weather permits
- Vegetative state of immature first crop growth and maintenance
- Begin vegging clones, creating mothers for second crop

Cultivation and Operations Plan

May

- Transplant and transition first mixed-light crops into greenhouses
- Second mixed-light crop propagation & preparation - vegetative stage
- Water, fertilizer, and pesticide use monitoring and recording

June

- First mixed-light crops transition into blooming stage, general crop maintenance
- Planting of full-term gardens
- Maintenance of vegetative second crops
- Water, fertilizer, and pesticide use monitoring and recording

July

- Begin harvest phase of first crops, drying stage begins
- Transition into second mixed-light crop planting & maintenance
- Water, fertilizer, and pesticide use monitoring and recording

August

- Harvest: Continued drying and prep of first mixed crops for distributor pickup
- Second mixed crop maintenance - blooming stage begins
- Water, fertilizer, and pesticide use monitoring and recording

September

- Second mixed-light crop bloom stage maintenance
- Water, fertilizer, and pesticide use monitoring and recording

October

- Harvest begins of full-term crops near the end of the month
- Second mixed-light crops bloom stage ends near the end of the month
- Harvest begins: drying and curing of second mixed-light crops for distributor pickup
- Water, fertilizer, and pesticide use monitoring and recording

November

- Harvest, drying, and preparation of second mixed crop & full-term outdoor for distributor pickup
- Skins are removed from greenhouses and hoopouses and season wrap-up commences

December

- Pots and beds covered and secured for winter
- Supplies & equipment stored for winter
- Water lines prepared for winter

2.2. Greenhouses & Other Operational Structures

There are five greenhouse structures made of lumber and either steel frames or PVC piping in which our Mixed Light cultivation occurs. There is one 20' x 100' nursery greenhouse with a 20' x 17.5' sectioned-off entryway for worker/equipment sanitation and propagation supply, leaving 20' x 82.5' feet of nursery/propagation space.

Most of the greenhouses/hoopouses are constructed out of lumber and metal piping, and others are made of lumber frames with PVC piping that will be upgraded to metal piping in the future. Because the

Cultivation and Operations Plan

property sits on a ridgetop, the ground is mostly hard rock. All of the mixed light/nursery greenhouses and outdoor planter beds are deeply embedded (estimated at six feet) in the rocky ground. The existing greenhouses/hoophouses have unimproved flooring consisting of mountaintop rock and the footpaths are uncovered ground with native grasses that are kept short.

Non-cultivation ancillary buildings currently in active use for this project are as follows:

- A 30' x 50' two-story barn for drying, and storage
- Two 8' x 20' shipping containers "sea crates" for storage
- Two 8' x 40' shipping containers "sea crates" for storage
- A 10' x 20' shed for ag storage
- A 10' x 10' generator and fuel cell containment shed with lumber walls and roof
- A 4' x 4' generator and fuel can containment shed with lumber floor and roof

On the bottom floor of the barn, in the back room is a 20' 17.5' area that is also used as nursery/propagation space for small clones and rooting plants that are too young and/or fragile to be outside. Please see Section 2.3 below for more information about propagation and transplant protocols. The barn also houses tools, supplies, cleaners, and equipment as well as serving as a drying space during the drying/curing phases of our operation.

2.3. Propagation & Transplant Protocols

As stated above, there is currently 350 sq. ft. of space in the 3000 sq. ft. barn that we use as propagation space for the operation (see Plot Plan for location). Both the first and second stories of the barn are divided into two rooms. The 20' x 17.5 nursery area is located in the backroom of the bottom floor and houses the young, fragile clones during the rooting stage before they are transplanted into a soil medium and "hardened off" to the elements.

We prefer to keep our genetics in-house with the use of mothers and seed production, but during winters with abnormally low temperatures and heavy snow the property becomes inaccessible and we have to buy clones and/or seeds at the beginning of the farming season to use for propagation.

In the future, we may seek approval to upgrade our infrastructure in order to create a suitable environment for keeping a nursery running through the winter so that we can control the propagation quality, timing, strain integrity, and avoid contamination with pests and disease. It is also highly cost-effective to create our own cloned crops from mothers that we house during the winter rather than purchasing plants from licensed retailers at the beginning of the season.

Our workers use gloves and keep the environment very clean when handling our genetics. Our supplies are cleaned and stored properly to avoid cross-contamination, and we keep safety and cleanliness protocols posted at the worksite.

Cultivation and Operations Plan

2.4. Nutrient/Amendment Protocols & Storage

We amend our soils and brew compost teas in lieu of using chemical fertilizers. The ingredients are generally bought and used as needed, with very little stored long-term onsite. Any unused nutrients and amendments are kept primarily in the 3000 sq. ft. two-story barn or (if actively being used) in the “sea crates” (shipping containers) near the cultivation sites at the north and south of the property (see Plot Plan for locations). Compost teas are generally brewed and applied every two weeks through the active farming season at a rate of 500 gallons per application.

We primarily use the following nutrients/amendments:

- Vitamin B1 liquid supplement
- Anasazi Gold Humic Acid
- Bokashi Compost
- Yucca Powder
- Aloe Powder
- Fish Meal
- Bone Meal
- Archipelago Bat Guano
- Seabird Guano
- Superthrive Vitamin Solution
- Orca Liquid Mycorrhizae
- Azos Beneficial Bacteria
- Xtreme Gardening Mykos Mycorrhizae
- Blackstrap Molasses
- Insect Frass
- Kelp Powder
- Dr. Earth Rainbow Mix
- Full Power Fulvic Acid
- Terpinator
- Peruvian Gold Bloom Rush
- Plant Therapy

Before any dry amendment, liquid nutrient, or foliar spray application, operators are required to evaluate weather conditions, equipment, and the site to be treated as well as the surrounding area in order to determine the likelihood of substantial drift or harm to non-target areas, equipment malfunctions, or creation of any health hazards. Care is taken that plants are not over-watered in order to minimize runoff to prevent nutrients from entering any native animal habitats or watercourses. Because we don't use any harmful substances or chemical products in our gardens, the risk of damaging or contaminating nearby flora and fauna is minimal. All operators and workers are required to follow labels and feeding charts as well as standard safety protocols when administering any nutrients or dry soil amendments.

Cultivation and Operations Plan

As we continue to streamline our operation under the new, evolving regulations, we will implement systems for keeping detailed records of all products purchased for and used in our cultivation operation. We will also keep up with new laws and guidelines released by environmental agencies such as CA DPR and CDFW as standards change for organic cultivation and best management practices.

All officers and workers are required to follow labels and feeding charts as well as standard safety protocols when administering any nutrients. As previously stated, Material Safety Data Sheets for all products used in our operation are kept onsite with our farm log and compliance paperwork.

2.5. Harvest, Drying & Processing

As shown in Section 2.1. Seasonal Schedule of Activities, there is an average of two crop cycles per season. The crops are generally harvested during July/August and October/November. The product is dried & cured in the 3000 sq. ft. two-story barn as shown on the Plot Plan. Our distributors come directly to the site and pick up the product in untrimmed, loosely packed bulk batches, then take it to their own licensed facilities for processing and distribution to licensed retailers. Because of this, we generally don't need more than 2-3 additional workers to help with harvest activities. In the past few years, family members of the operator (J. Klawitter) have assisted with the busy periods of the season (planting & harvest) but in the event that we find ourselves understaffed, we will hire employees through a local, established staffing agency for temporary seasonal help.

2.6. Staffing Requirements & Employee Safety Policies

The existing cultivation operation requires two workers during the entire farming season, plus additional labor during transitional parts of the year (i.e. planting & harvest). The farm was owner-operated in 2021 due to only part of the total pre-existing footprint being planted, but moving forward we may need one full-time employee in addition to the owner.

Because our processing is done off-site through our licensed distributors, we anticipate only needing three or four extra field laborers at most for short times throughout the season and no additional housing or facilities are required to accommodate them. As mentioned in the previous section, family members have historically pitched in to help during busy times. Hired workers will not stay on the property during the farming season. The owner recently purchased a new RV travel trailer to keep on-site for his personal use during the infrequent days when he is unable to drive back to his home in Arcata due to long work hours or inclement weather/road conditions.

All workers are provided with gloves and protective eyewear as needed. We keep bottled water, eyewash solution, and basic first aid kits on-site for employees to use as needed. There are two eyewash stations on the property (in both north and south cultivation areas). As stated elsewhere in this document, Material Safety Data Sheets for all nutrients, amendments, and other compounds used for the operation are kept on location so that workers can easily identify how to respond to any spills, accidents, or emergencies. Spill kits are kept in multiple locations on the premises.

Cultivation and Operations Plan

2.7. Security Plan and Hours of Operation

The parcel where this operation is located is in a very remote rural location near Indian Ridge in what is a primarily thickly-forested area, and to this point, no stringent security measures have been necessary. The cultivation area is isolated from view and cannot be easily accessed from any well-traveled public road or hiking paths. There are two game cameras on-site which provide surveillance for the front and back access gates.

There is no foot traffic through or near the parcel except by the property owner and the employees who work for Three Creeks Holdings LLC, and the only vehicular access to the site is from the private drive through locked gates, which are only accessible after passing through the main community gate off Old Three Creeks Road. There is always at least one person on-site at various times each day during the farming season.

We are willing to employ any additional security measures that the governing agencies deem necessary for permit approval. Our official hours of operation are generally 10:00 am to 2:00 pm, Monday through Friday during the farming season. These hours change with weather and daylight throughout the farming year, so inspectors and agents are encouraged to call the contact number at the bottom of this document to schedule appointments.

3. ENVIRONMENTAL CONSERVATION

3.1. Water Source and Storage

Water for the cannabis operation comes from a 240 foot-deep groundwater well that was dug by Fisch Drilling in 2012. The well is solar-powered and the water is gravity-fed into the cultivation sites. CDFW has deemed the well non-jurisdictional. There are no ponds or reservoirs on the property, and no surface water diversion occurs.

There are two hard water tanks on the property currently devoted to water storage, a 2,500-gallon tank in the northern cultivation area and a 5,000-gallon tank in the southern area. They are both fitted with functional float valves that automatically shut off water flow when the tanks are full. A 2,500-gallon tank is proposed for SRA fire suppression purposes, which will also be equipped with an auto-shutoff float valve to prevent spills or over-filling. There are two small tanks (a 250-gallon cage tank in the southern area and an 800-gallon hard tank in the northern area) that get filled by hand as needed and are used for brewing compost tea.

Domestic water used is minimal, simply for drinking water, watering vegetables, and refilling the RV reservoir. Drinking water from two sources, both bottled water and filtered well-water, are available to workers and pets.

Cultivation and Operations Plan

3.2. Irrigation Plan & Projected Water Use

The irrigation system for our cultivation is currently hand-watering and application of compost teas from gravity-fed tanks. As of August 2021, meters have been installed and detailed monthly records will be kept going forward. Estimated water usage is based on the number of times our 2,500-gallon reservoir tank is filled over the season from the groundwater well.

Our total water usage per year is approximately 189,000 gallons based on the following table:

	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Gallons Used	0	0	0	15k	24k	27k	27k	33k	27k	21k	15k	0

We plan to install drip line in all our beds in the near future with automatic timers. Because we grow in the ground our water usage is very low compared to cultivators who use fluffy potting-type soils in containers with high evaporation and low retention rates.

3.3. Watershed and Habitat Protection

The cultivation areas are in excellent locations for preserving water quality. As mentioned in Section 3.1., the 2,500-gallon tank is fitted with an auto-shutoff valve to ensure that water doesn't leak or spill due to overflow. NRM Corp. is working closely with both CDFW and the State Water Board to make sure that the operation properly mitigates any threat to water quality and/or sensitive habitats and species.

Cultivation occurs in beds within greenhouses or raised garden beds, so runoff from pots or growing containers is of no concern to surface water. Straw wattles are used at the lowest ends of the terraced beds in the northernmost area to prevent sediment runoff & erosion and during the wet season, loose straw is placed on any naked ground where natural vegetation is not present (i.e. greenhouse perimeters & any bare-ground footpaths within cultivation areas where grass isn't growing).

The cultivation areas are over 600 feet from any watercourses. No surface water is diverted for irrigation. We will work closely with our team of licensed professionals on the design and development of future infrastructure as we upgrade and improve the existing conditions. We care very much for the preservation of the environment and are committed to proper land stewardship in our agricultural practices.

3.4. Energy and Generator Usage

Power for the operation currently comes from two generators. There is a 26kW diesel Kubota generator, which powers the barn and various operational equipment at the northern cultivation site. The diesel generator runs for an average of 1500 hours per year (primarily for a month at the beginning of the farming season and a month at end of the farming season to power fans, heaters, and supplemental lighting

Cultivation and Operations Plan

as needed) and is housed in a walled shed with a concrete containment tub in the northern (main) cultivation site.

We also use one small, gasoline-powered, 3000kW mobile Honda generator which is moved around the property as needed for mixing pumps (compost tea brewing) and misc. operational equipment. As no supplemental lighting is used for the blooming stages of our Mixed-Light greenhouses, generator use and fuel consumption are greatly reduced compared to operations that use high-draw blooming lights such as Gavita fixtures and double-ended 1000w bulbs and ballasts.

The small Honda generator has a noise rating level of fewer than 50 decibels and runs for approximately 1,700 hours each per season. Upon project approval, we will make plans to invest in an alternative power source (such as solar) so that we are able to use generators for less than 80 hours per year by 2023 as outlined in the CA Code of Regulations Title 3, Division 8, Chapter 1, Section 8306.

As mentioned elsewhere in this document, the well is solar-powered and the water is gravity-fed down to the storage tanks on the cultivation sites from the well.

3.5. Lighting & International Dark-Sky Standards

All of the Mixed-Light greenhouses as well as the 20' x 82.5' nursery greenhouse will use early-season, low-wattage lighting (like string-style work lights) to keep young plants from blooming pre-maturely and will be covered carefully with blackout tarps and inspected daily to ensure that no light escapes the structure. We use Sure-Lock Poly Fasteners and "wobble wire" to make sure that the greenhouse tarp coverings stay tightly in place and shield all light from the outside.

We take special care to make sure that any light used does not disrupt any nearby wildlife or neighboring properties from one hour before sunset until one hour after sunrise. We use the lowest wattage feasible for our various lighting fixtures (such as work lights, security/motion lights, etc.) to conserve energy as well as to prevent unnecessary glow for the surrounding areas.

3.6. Use and Storage of Pesticides

Three Creeks Holdings LLC practices integrated pest management techniques using regenerative farming practices whenever possible. An example of this is to carefully monitor our irrigation techniques (and change them throughout the season depending on weather & specific plant needs) to ensure we are not over-watering, which prevents fungus & disease. We pull weeds around the garden site and keep natural grasses cut low to prevent cross-contamination. Cleanliness is crucial for healthy plants.

We also implement biological pest-management control methods to deter pest and disease problems. By using beneficial insects such as ladybugs and beneficial mites, as well as applying horsetail compost tea and essential oils (as listed below) we are able to completely prevent the vast majority of pest infestations in our garden sites.

Cultivation and Operations Plan

We are educated on the Department of Pesticide Regulations' guidelines for products that are acceptable to use on cannabis, and because of the preventative actions we take to ensure cleanliness and cross-contamination, we rarely have any fungal or pest problems needing treatment. On the rare occasion that we develop powdery mildew or mites, we purchase and use one or more of the following products:

- Rosemary Oil
- Garlic Oil
- Potassium Bicarbonate (Baking Soda)
- Neem Seed Oil
- Venerate (Burkholderia spp. Strain A396)
- Trifecta - Active Ingredients: Thyme & Rosemary Oil, Clove Oil, Garlic Oil, Peppermint Oil, Corn Oil, Geraniol, Citric Acid
- PureCrop1 - Active Ingredients: Soybean Oil, Corn Oil
- Lost Coast Plant Therapy - Active ingredients: Soy Oil, Peppermint Essential Oil, Citric Acid

Any unused portions are kept in their original containers in the 8'x40' "sea crates" (shipping containers) that are near the cultivation sites with the other nutrients and supplies. Please see Plot Plan for the various shipping container locations.

3.7. Use and Storage of Fuels & Other Regulated Products

To the west of the northern mixed-light greenhouses, there is a 1000-gallon diesel fuel cell in a 10'x10' containment shed. The shed's roof and walls are made from lumber, and the floor is a concrete tub with a curbed lip that acts as a fuel-safe liner. This containment shed also houses the 26kW Kubota generator which is currently the primary source of power for the property. The fuel tank is filled and serviced by Renner Fuel.

We keep a number of small cans (5-gallon or less) with unleaded gasoline for weed eaters, chainsaws, backpack sprayers, and the small mobile Honda generator. The small cans are kept safely out of the elements in one of the "sea crates" near the two-story barn near the main cultivation site (north), or within the sea crate on the southern cultivation site. Any fuel-powered tools and equipment such as generators, mowers, tillers, chainsaws, string trimmers, etc. are maintained off-site at Bigfoot Equipment & Repairs in Willow Creek as needed. The large generator is serviced at Trinity Diesel in Arcata.

Portable propane heaters are used at various times during the season temporarily in the barn for drying and curing our product (as well as the occasional domestic food preparation) and there are approx. ten small tanks for propane storage in various sizes which are stored in one of the "sea crates" (shipping containers) near the barn.

All basic cleaning compounds like bleach, vinegar, window cleaner, etc. are kept in the yurt and/or shipping containers with the other general supplies. We do not use any hazardous substances, and all of our chemical bottles are properly labeled. As stated previously, we keep MSDS on-site for employee reference and have spill kits handy in multiple locations in case of fuel or nutrient spills.

Cultivation and Operations Plan

3.8. Waste Management Plan

Our trash is mostly comprised of domestic garbage (food containers, etc) and plastic bags/containers from amendments & nutrients which are placed directly into 55 gal cans (usually kept in the back of the work truck) and removed immediately from the cultivation sites to be stored in a hauling trailer for removal as often as accumulation requires. Garbage is hauled to Humboldt Sanitation in McKinleyville or Tom's Trash on Highway 299 near Willow Creek. Trash is generated so infrequently that during most of the season we only have to haul it away once a month on average. Most of our operational supplies are reusable.

An 8' x 8' compost cage will be constructed for plant waste (leaves, clippings, and stems) in the spring of 2022 on the northwest side of the property where there is an old clearing used as a turnaround close to the locked gate. The cage will be constructed with a lumber frame and mesh wire sides, and straw waddles will be placed around the outside to prevent bacterial/nutrient runoff during heavy rain events.

3.9. Soil Management Plan

All of our soil remains in the planting containers during the year (both before and after the season), and we do not replace our soil or discard used soil. If needed, we add soil at the beginning of the season to compensate for general compression and loss due to root removal. Soil is not purchased every year, but when it is needed, we generally add 10-20 yards of unpackaged bulk soil per year, purchased from Bayside Garden Supply in Arcata.

During the winter, the soil that was used in the greenhouses during the previous season remains in the beds and containers. Planter beds are seeded with cover crops & native grasses during the winter to ensure that the soil stays in place during rain/wind events.

3.10. Wastewater Disposal System

Historically, an outhouse served as a restroom for the owner/operator, but has not been used in some time and will be decommissioned/removed as part of the permitting process. Currently, the owner/operator has a new 30-ft. RV on-site with a functional kitchen, bathroom, and shower for his personal use during work hours. The RV is taken to a local fuel station as needed to empty the wastewater holding tanks. No wastewater is dumped on-site.

As of April of 2021, a portable toilet has been rented to replace the outhouses since an additional full-time worker and 3 to 4 temporary/intermittent workers will be needed once the operation is running at full capacity. Maintenance receipts (as shown below) for the portable toilet are kept on-site, and the portable toilet will be removed during the winter months. An invoice will be submitted to the county planner with this document as proof of contract for the B&B portable toilet as requested in the Incomplete Letter dated 11/1/19 in Item #12-g. Please see the Plot Plan for the location of the portable toilet.

Cultivation and Operations Plan

Due to the fact that our processing is done off-site by the licensed distributor and only one full-time worker aside from the owner is needed for the majority of the year, we believe that the portable toilet will be sufficient for the near future until a more permanent system is planned and implemented. Please see Section 2.5. And 2.6. for more information regarding both employees and processing procedures.

Omsberg & Preston, Engineers will conduct any needed testing and design and permitting if a septic system is deemed necessary as a condition of project approval. Please contact Omsberg & Preston for more information regarding plans for a more permanent wastewater system.

Cultivation and Operations Plan

Addendum #A: Timber Conversion (Incomplete Letter Item #5)

The Incomplete Letter dated 11/1/19 alleges that timber conversion occurred between September and October of 2018 in the southern area of the property. The following photos show that the area was cleared prior to May 28, 2014, and no substantial changes have occurred since that time. The final photo is dated 6/9/15 and is taken from the CAV performed by HCPB planners on 3/22/18.

Google Earth - 5/28/14



Cultivation and Operations Plan

Google Earth - 5/26/16



Google Earth - 4/30/19



From CAV performed by HCPB - Terraserver 6/9/15:

Image Drawer

Date Range  All Images

 2016-02-27 10:50m	 2017-03-12 10:50m	 2016-06-02 10:50m
 2016-08-02 10:50m	 2015-11-04 10:50m	 2015-11-04 10:50m
 2016-08-09 10:50m	 2013-08-26 10:50m	 2011-06-19 10:50m



Cultivation and Operations Plan

Addendum #B: Restoration & Relocation (Incomplete Letter Item #11)

After consulting with NRM Corp. regarding the "guerrilla" grow area in the center of the property and studying pictures of the clearing, no formal restoration or timber restocking efforts seem to be needed. The small clearing is already being reclaimed by nature and does not pose any threats to future timber production, sensitive habitats, or water quality. There is no ground instability or erosion, and the property owner believes that the clearing may have been an old logging "deck" that was later cultivated on by previous property owners.

The following photos (taken 8/26/21) show the old "guerrilla" site in its present state, which is currently undergoing cleanup of a few abandoned supplies that were left there by the previous owners. As seen in these photos, there are some very old stumps and logs remaining at the perimeter.



As stated, the informal opinion of NRM Corp. at this time is that no restorative actions are needed, as long as any and all man-made materials such as water lines, fencing materials, or slash piles are removed from the area. Site visits and further review will take place in the near future, please contact NRM for more information or questions pertaining to the restoration of the "guerrilla" site (location shown on Plot Plan).

For details regarding the relocation of the footprint found in the "guerrilla" site, please see Section 1.4 above.