APN: 522-022-015-000

CALIFORNIA CANNABIS CONSULTANTS

Operations Plan for:

Applicant/Owner

High Art, LLC.

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Introduction

Project & Parcel Overview

High Art, LLC (HA, LLC) submitted application 11525 with the Humboldt County Planning & Building Department for a Conditional Use Permit, resulting in the issuance of an Interim Permit for 18,780 ft2 of pre-existing outdoor cultivation. The Interim Permit has been extended through 2020 and the Applicant has received their Provisional Medium Outdoor License with the State. A copy of the State License Certificate is included in this updated application packet. HA, LLC is requesting the allowance of 20,180 ft2 of pre-existing outdoor commercial cannabis cultivation on APN: 522-022-015 based on the inclusion of additional CAV. The proposal includes onsite consolidation of pre-existing cultivation to an environmentally superior location including plans for retirement and remediation. A 3-acre conversion has been approved by CalFIRE and is in progress. Updates to the Operations Plan (this document) and the Site Plan (included) propose on site relocation but no changes to the cultivation operations will proceed until such time as the plan is approved by the County.

An increase in CAV is requested because although one 1,400 ft2 HA, LLC greenhouse was visible in the 2014 imagery, it was not included in the original pre-existing measurements as it plots just outside of the HA, LLC parcel boundary on the Humboldt County Web GIS parcel layer. At the County's advice, in lieu of a professional property survey, the Applicant has received a signed letter from the owner of the adjacent parcel (APN 522-023-001) stating that this greenhouse does not belong to him; HA, LLC established the greenhouse in this area believing it was HA, LLC property. Adding the 1,400 ft2 to the existing Permit would increase the total approved cultivation area to 20,180 ft2.

The parcel is located within the Supply Creek watershed and borders the Hoopa Valley Tribal Lands. The Applicant has remained engaged with the Supply Creek Watershed Working group and a study has been produced and provided to the county to assess localized land-use and water resources protection practices, in an effort to reduce their cumulative impacts on the Supply Creek watershed. HA, LLC has and will continue to make every effort to minimize their impacts to the Supply Creek watershed. The consolidation of all cultivation activity to one location on the parcel will reduce impacts compared to the existing fragmented footprint as well as reduce potential risk associated with transportation and use of cultivation materials. Moreover, decommissioning of the pre-existing cultivation sites and their associated road network will remove potential cannabis impacts to more than 140 acres of watershed area on the project property that contributes to Supply Creek. The relocation and consolidation are expected to produce a more efficient and profitable business operation, and more importantly providing enhanced environmental protection and enhanced habitat preservation.

The property is 226.5-acres; zoned TPZ; located off of Old Three Creeks Road in the headwaters of Supply Creek, and bordering Hoopa Tribal Lands. Historically the parcel was under the USFS ownership. The pre-existing cultivation sites are legacy logging yarder decks or skid road and *the relocation is an opportunity to mitigate the legacy impacts in this sub-watershed into perpetuity.*

The Less Than Three Acre Conversion has been approved and is currently in progress at the site; a copy of the approved Less Than Three Acre Conversion Exemption Report is included in this packet. The conversion work is expected to be completed and signed-off by CalFIRE in the next few months. We are now amending our original application to include a Relocation/Consolidation Plan to move all pre-existing cultivation areas to the approved Less Than Three Acre Conversion location. Updates to the operations plan which are specific to the project consolidation are included in this document; all operational locations, methodologies and materials not specifically updated from the previously submitted Cultivation and Operations Plan, dated December 15, 2017 remain unchanged and are included here by reference. Supplemental documents to this Relocation/Consolidation Plan consist of an updated Site Plan specific to proposed changes; a Road Decommissioning Plan with specific retirement and remediation recommendations; and, a Biological Report that addresses habitat concerns, relocation, and reforestation.

The parcel is accessed from Hwy 299 about 11 miles west of Willow Creek, and then approximately 8 miles along Old Three Creeks Road. Humboldt County maintains the first three miles of Old Three Creeks Road; A Road Evaluation Report has been developed for the remaining five miles of private road to the project site, and is included in this packet.

Relocation/Consolidation Plan

The pre-existing cultivation is located on historic USFS logging roads. The applicant plans to decommission the roads and centrally locate all cultivation to one environmentally superior location on the parcel. Decommissioning the arterial road system will significantly reduce the amount of erosion and sediment delivery potential associated with the HA, LLC property. Protecting habitat for anadromous fisheries and promoting water quality in the Supply Creek watershed is a top priority for HA, LLC.

A Road Decommission Report describing treatment recommendations and procedures for retiring the abandoned sections of road has been prepared for the project by 1 Degree Consulting, and is included with this responsive packet. HA, LLC has obtained approval from CalFIRE for a less-than-three-acre conversion on the parcel, and we are amending the original operations plan and County application to allow for the Relocation & Consolidation of pre-existing cultivation sites. Moving the existing cultivation to the proposed relocation site - and removing all introduced materials from the historic sites in the decommissioning process - will ensure that cannabis cultivation is at least 1,600 feet away from adjacent tribal lands. Consolidating the existing cultivation areas to one location will greatly reduce the expanse of operational impact to wildlife habitat and natural resources in general. Moreover, the relocation/conversion receiving area is an environmentally superior project site - on stable slopes with less than 15% natural grade compared to the pre-existing logging flats and appurtenant road on unstable slopes with 50% (+) grade. Additionally, the relocation and consolidation of the pre-existing sites will allow the legacy logging roads to be decommissioned: creating a hydrologically invisible feature on the hillslope that is maintenance-free and mitigates potential for anthropogenic erosion and sediment delivery to Supply Creek. Finally, restoration treatments will also promote the natural botanical repopulation of the decommissioned areas with native plant species. Relocation and road decommissioning will eliminate potential anthropogenic impacts to 143 acres of HA, LLC ownership: a sub-watershed, tributary to Supply Creek.

The pre-existing cultivation sites and the proposed relocation site were assessed by a qualified biologist with Natural Resources Management Corp (NRM) on October 11, 2019. The Biological Report states that no Northern Spotted Owl (NSO) habitat exists on the parcel and, while habitat for both the special status species Accipiter cooperii (Cooper's Hawk) and Sonoma tree vole (Arborimus pomo) was identified in the vicinity of the project areas, no special status wildlife species were detected during the site visit. The report determined that the project and operations will have no impact on wildlife species within the vicinity of the project area. A copy of the final Biological Report is included in this application packet.

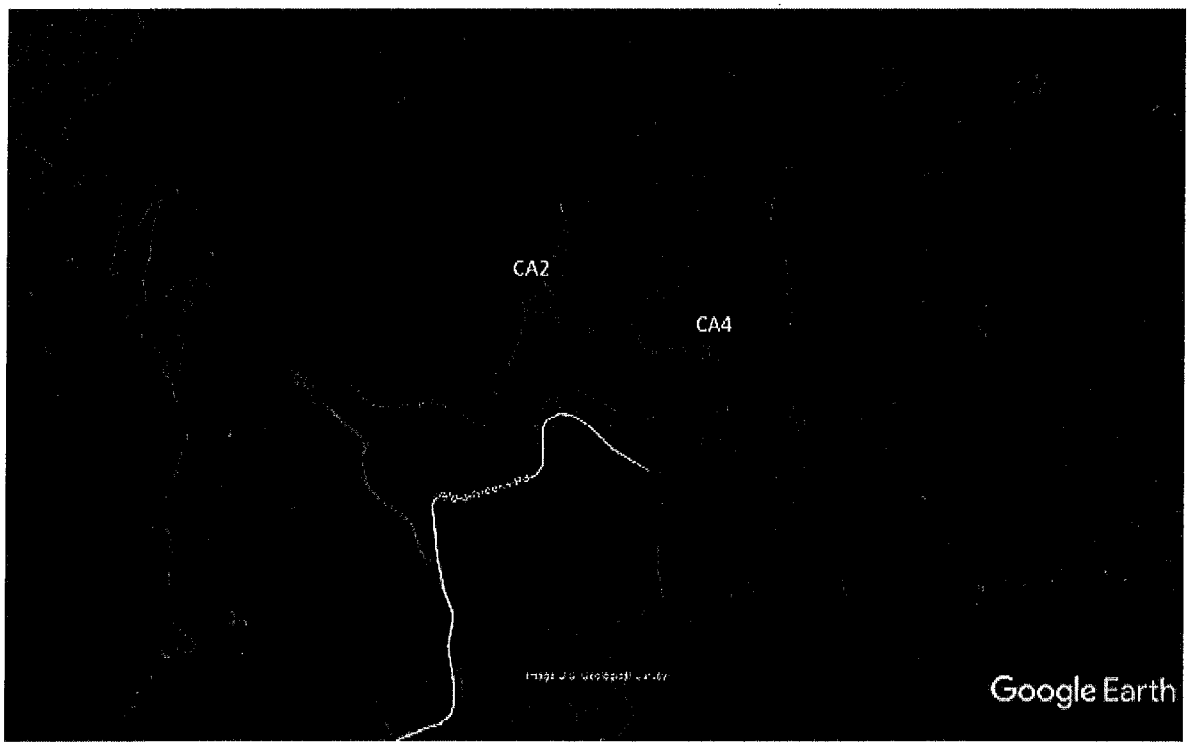

Figure 1. 1988 image showing timber extraction along road where cannabis currently exists.

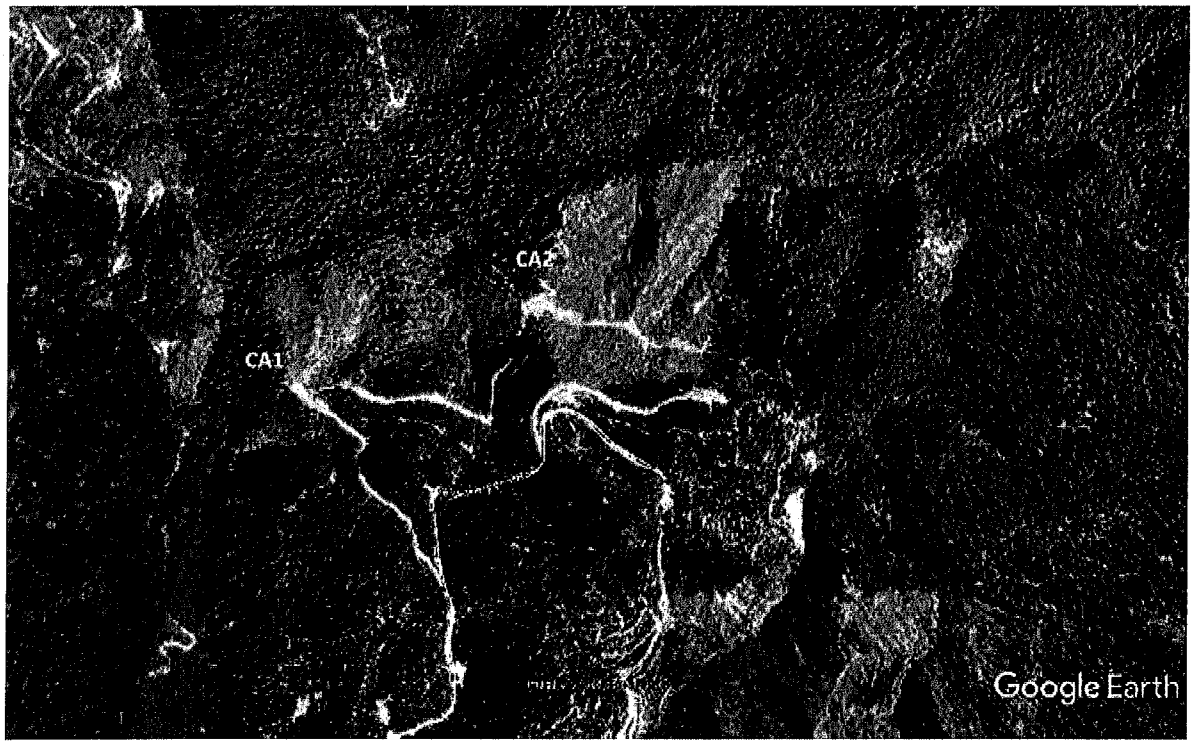

Figure 2. 1993 image showing timber extraction along road where cannabis currently exists.

Google Earth imagery shows first-cycle timber extraction in 1988 upslope and downslope of the road segment that runs between CA2 and CA4 (Figure 1). Likewise, all legacy transportation road on the parcel is observable by this time. By 1993, the downslope area had been relieved of its old growth timber between CA2 and CA1 (Figure 2). Cannabis cultivation is apparent in 2014, but likely commenced in 2013

(no imagery). Remediation of the of the cultivation areas will not involve regrading logging road corridors to their original topography, but rather applying mitigation treatments to leave the corridors in a state that will eliminate sediment delivery potential and promote natural botanical repopulation. The single largest improvement to water quality will be the full restoration of the stream crossing SC1, removing a potential 200 yd3 of sediment that could delivery to the watercourse if a catastrophic failure were to occur and eliminate the continuous active delivery resulting from the poorly placed culvert (shotgun).

Remediation of Cultivation and Removal of all Related Materials

Cultivation is currently in its pre-existing location. The proposed relocation of these cultivation areas will involve the remediation of all cultivation and associated activities as well as the removal of all cannabis related / anthropogenic materials. Cultivation materials including bags/pots or other containers; imported soil; greenhouse frames and coverings; trellis or netting; buildings or structures; tools and equipment; and, refuse will be removed and disposed of at a proper facility or relocated and utilized in the proposed consolidation (see Site Plan). Remediation of the pre-existing cultivation areas (CA1 – CA5) will include removal of all non-native soil (including potting soil in cultivation holes unless removal would result in increased impacts), grow bags, irrigation piping, plastic netting or metal trellising, and miscellaneous debris or material associated with human activity. The owner will also remove all existing structures within the restoration areas. At CA1 there are five pre-existing cabin structures, solar panels, one 250-gallon propane tank, one CONEX storage container, and one outhouse building. The five housing structures and outhouse building will be taken down, and the outhouse will be decommissioned and filled in with native soil. The CONEX storage container, solar panels, and 250-gallon propane tank will be relocated to the consolidation site. At CA4 there is an old cabin, which also holds a pre-existing outhouse. The old cabin will also be taken down, and the outhouse will be decommissioned by filling in with native soil. At CA5 there is a pre-existing greenhouse structure which will be removed and relocated to allow for restoration at this site. Any salvageable materials will be repurposed, such as metal trellising, grow bags, water irrigation piping, etc., and any unusable nor recyclable materials will be taken to a licensed local waste transfer station.

Habitat Restoration - Road Decommissioning and Reforestation

Road segments to be decommissioned are shown on the updated Site Plan included in this application packet. The road reaches will be closed to vehicular access and mitigated for erosion potential. Aside from the full restoration of the stream crossing SC1, regrading of the cultivation flats will be limited to areas of perched fill at CA1 and CA4. Cultivation areas were developed on pre-existing logging landings with minimal alteration: no expansion grading. The logging road that encompasses CA1 – CA4 is on a hillslope prone to mass movement and underlain by a mélange that has moderate to high erodibility. None the less, this 30+ year old road reach has only experienced a few minor slumps that were quasi-stable as observed in winter 2019/2020. The greatest threat to water quality is the stream crossing at SC1. Full restoration/removal of this stream crossing will eliminate access to CA2 - CA4, which necessitates maintenance-free treatments to permanently remove potential for surface erosion and sediment delivery associated with the road. Large-scale mass movement on this hillslope is outside the sphere of treatment for erosion related human activity. Small-scale, road-related mass movement is limited to small slumps in 2 places that have settled and appear stable. Moreover, based on these slumps, road related mass movements will not have the volume to travel the distance required to impact a waterway. In the Biological Report produced for HA, LLC it states that remediation measures for decommissioning pre-existing cultivation sites and roads should include seeding bare soil with a native grass seed mix and mulching with weed free straw. It also mentions that natural regeneration of Douglas-fir, Tan Oak, and Madrone is expected to occur over time. Because the designated area to be decommissioned exceeds the conversion area, it is anticipated that with the allowance of natural revegetation, the natural regrowth of tree species should meet or exceed the 1:1 replanting requirement of the approved Less-than-three-acre conversion.

The Applicant will monitor the restoration treatments applied to the decommissioned areas for 5 years. Observational data will be collected annually in the form of pictures, to document the progress of revegetation and any occurrence of surface erosion. If erosion is observed, a professional will be engaged to assess the need for adaptive management; if tree seedlings are not observed after three years, a professional will be engaged to assess the need for adaptive management. In the event that the natural revegetation of habitat restoration areas is found inadequate to meet the 1:1 minimum requirement for replanting trees removed in the conversion area, the Applicant will procure and follow a planting plan or other professional recommendation.

Cultivation Plan (update)

General

The pre-existing outdoor cultivation is located at five different locations on the parcel, with four of them being currently utilized. The four approved pre-existing outdoor cultivation areas in the CAV total 18,780 ft2. The Applicant was granted a CAV for 18,780 ft2 of outdoor cannabis cultivation, but one additional 1,400 ft2 greenhouse was not included in these measurements because Humboldt County Web GIS shows the greenhouse on the adjacent parcel to the East. Because the Applicant established the greenhouse cultivation at the same time as the other grow areas, believed it was on his property, and has also received a signed letter from the owner of the neighboring parcel disclaiming the 1,400 ft2 greenhouse, HA, LLC requests this greenhouse be included as part of HA, LLC's verified pre-existing cultivation. Once approved, the new total of pre-existing CAV that will be consolidated in the proposed relocation area will be 20,180 ft2 – this square footage is represented on the proposed Site Plan. HA, LLC plans to conduct light-deprivation methods for the consolidated outdoor cultivation site. The cultivation will take place in ten 20 x 100-foot (2,000 ft2) greenhouses. No supplemental light will be used in this process. This method of cultivation will help prevent the presence of mold and allow for two harvests or more per season but in no instance more than 5 cycles per year. HA, LLC is also requesting two 2000 ft2 ancillary propagation greenhouses at the consolidation site in order to sufficiently supply the farm with immature plants. Mother plants will be maintained in this ancillary propagation area along with cuttings and developing root stock. Immature plants will be started using purchased seeds or clones, and will not be allowed to flower in the propagation greenhouses. Processing will be performed off-site.

Proposed Schedule of Activities	
January	Winterization implemented on the site.
February	Winterization implemented on the site.
March	Amending Soil
April	Start from seeds, or buy clones. Plants started in Propagation GH.
May	Plants are in vegetative state in the Light Dep GH. May 15 flowering cycle starts in Light Dep GH
June	Light Dep GH flowering. 2nd round of starts planted in Propogation GH
July	Light Dep greenhouses flowering. Harvest 1st cycle. 2nd starts planted & vegetate in Propagation GH
August	2nd starts flowering in the Light Dep GH.
September	2nd starts flowering continue.
October	Harvest 2nd cycle plants.
November	Clean up site, and prepare site for winterization.
December	Winterization implemented on the site.

Water Source, Storage Plan, Irrigation Plan, and Estimated Use (2017 Ops Plan edit)

The project utilizes a permitted groundwater well as the sole source of water for the property. There are no surface water (stream or spring) diversions on the property. Installed by Fisch Drilling in 2013, the well is two hundred five feet deep, ten inches in diameter, sanitary sealed at twenty feet deep, and

encountered first water at eighty feet deep. The well has an estimated yield of fifteen gallons-per-minute (gpm) in July of 2013. Water storage tanks will be filled in the winter/spring seasons and refilled as used in the summer months; tank filling rate in the summer months will be limited to 3-5 gpm in order to minimize groundwater impact in the dry seasons. Two hard-sided storage tanks exist at the well. The tanks consist of one at 2,500 gallons holding capacity and one at 2,800 holding capacity totaling 5,300 gallons. Water is delivered from those tanks to two additional holding tanks with capacity of 2,800 each for a total of 5,600 gallons of holding capacity. The future proposal includes ten (10) additional five thousand-gallon (5,000-gal) HDPE hard-sided water storage tanks for a total of sixty thousand gallons (60,900-gal) specifically for cultivation or fire. One 5,000-gallon tank will be dedicated/reserved for fire suppression. The purpose of the remaining storage is to maintain pressure for irrigation and filling nutrient mixing tanks. This shall also provide about three (3) weeks emergency back-up in the advent of a water system related issue.

1. Tanks shall be connected to the permitted well which is pumped by an existing solar power system and gravity from the Tanks to the garden;
2. A meter shall be installed on the wellhead and recorded on a monthly basis as required by the State Water Board Discharge Waiver; Irrigation will be conducted by drip tape watering at agronomic rates, as necessary for ambient conditions, growth stage, and plant strain. The methods will prevent overwatering and potential for irrigation run-off.

Estimated Water Use for Cultivation, by Month (gallons)													
	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	
Prop	0	0	0	9,000	10,000	0	10,000	11,000	0	0	0	0	
Flower	0	0	0	0	16,000	31,000	31,000	31,000	30,000	20,000	0	0	
Total	0	0	0	9,000	26,000	31,000	41,000	42,000	30,000	20,000	0	0	199,000

Prop = Propagation Greenhouse

SWRCB Compliance

High Art, LLC has received a Notice of Applicability from the North Coast Regional Water Quality Control Board (NCRWQCB) that provides notice that the requirements of the State Water Board Cannabis Cultivation Policy - Principles and Guidelines for Cannabis Cultivation (Policy), and the General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities, Order WQ 2019-0001-DWQ are applicable to the site enrolled as WDID 1_12CC409130. A Site Management Plan was prepared by Pacific Watershed Associates.

Stormwater Management

Cultivation will be in greenhouses and therefore not interact with stormwater run-off. Stormwater run-off associated with roads on the property is addressed in the Site management Plan and/or the Road Decommissioning Plan: stream crossings will be restored to mimic (pre-road) natural conditions or upgraded to accommodate the 100-year discharge volume. Road reaches will be hydrologically disconnected from waterways with drainage breaks or road shaping that prohibit concentrated run-off. Ultimately, all road will meet or exceed the conditions recommended in the Handbook for Forest, Ranch & Rural Roads.

Invasive Species Control Plan

The Biological Report prepared for HA, LLC describes the botany in as much as it relates to potential wildlife habitat as well as identifying special status botanical species documented in the area. The report does not identify nor exclude any invasive plant species on the property. The plan for controlling invasive species will be to minimize the risk of invasive species introduction. To that goal, the following procedures will be followed:

1. Application of grass mix will be avoided if possible. Where necessary, native grass mix will be

procured from a local, reputable source.
2. If seed mix is used for erosion control, the new growth will be evaluated by a botanist during the appropriate season to identify invasive species.
3. All heavy equipment that is used on property shall be power-washed prior to move-in. This will minimize the potential for introduction from previous equipment worksites.

Materials Management Plan (from Site Management Plan)

All fertilizers and soil amendments are mixed into the soil at the beginning of the growing season and amendments are applied throughout the growing season. Any excess fertilizers or amendments are stored inside a weather-tight shipping container. All empty containers are disposed of at either Humboldt Waste Management Authority in Eureka or Humboldt Sanitation & Recycling in McKinleyville. Spill Prevention and Cleanup: The likelihood of chemical spills will be minimized by storing all fertilizers, pesticides, and herbicides off of the ground and in designated enclosed containers and structures. Spill cleanup will be initiated as quickly as possible after occurrence. In the event of spills on pavement or concrete, solid materials will be removed utilizing a broom/brush and pan or vacuum. Affected paved surfaces will be decontaminated using a mild detergent and water. Liquid chemical spills on pavement or concrete will be captured using absorbent materials. Spills of solid or liquid materials on soil will be cleaned by removal of the spilled materials and contaminated soil using a shovel and/or absorbent materials. Contaminated soil will be stored in a labelled sealed container. Disposal of contaminated materials will be conducted in accordance with manufacturer's instructions and local regulations.

Fertilizers and Soil 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.		

Petroleum products are limited to gasoline, diesel, and incidental grease or oil. Fuel is purchased premixed or is mixed by hand with oil. Generator use is minimized. Generators that require gas are only used in the fall for drying harvested cannabis or to power the well pump in the case that the solar panels are not functioning. If petroleum products are onsite during the offseason, they are stored in a sealed shipping container. Non-recyclable containers are disposed of at either Humboldt Waste Management Authority in Eureka or Humboldt Sanitation & Recycling in McKinleyville. Spill Prevention and Cleanup: The likelihood of petroleum spills will be minimized by storing all petroleum off of the ground and in designated enclosed containers and structures. Spill cleanup will be initiated as quickly as possible after occurrence. Liquid petroleum spills on pavement or concrete will be captured using absorbent materials. Spills of liquid materials on soil will be cleaned by removal of the spilled materials and contaminated soil using a shovel and/or absorbent materials. Contaminated soil will be stored in a labelled sealed container. Disposal of contaminated materials will be conducted in accordance with manufacturer's instructions and local regulations. Spill prevention cleanup kits will be readily available and located where fuel is stored and where refueling occurs.

Sewage Disposal Plan (update)

Currently the property is occupied only during the cultivation seasons. Two legacy pit toilets are planned to be decommissioned. Rented portable toilets (with handwashing station) are onsite from May through November. The rental contract includes bi-weekly service. The 3-acre conversion will include space for a three-bedroom residence and OWTS in addition to the proposed cultivation relocation. The site is scheduled for a (suitability) perc test and it is anticipated that the septic design will include capacity to accommodate cultivation workers in addition to residents.

Soils Management Plan (2017 Ops Plan/update)

High Art, LLC. currently has constructed pits in native soils and over years brought in agricultural soils for cultivation use. Protection from overuse of inputs and reuse of these soils shall continue to be a key component of operations. Operations shall protect this resource through the following means (refer to the Updated Site Plan for these locations):

1. All farming on-site shall be certified organic;

2. Cultivation shall occur only in the conversion area;

3. Mixing, tilling, and amending of soils shall occur within the designated, contained area;

4. Soils shall be reused, composted on-site, and no dumping off-site shall occur;

5. Composting shall consist of a dedicated secure area. Cultivation vegetative materials shall be chipped back into the compost pile;

6. Cover crops shall be utilized when not in cultivation to improve soil vitality and to reduce soils loss;

7. All requirements of the waterboard ORDER and cannabis policy shall be implemented.

Processing Plan & Practices (2017 Ops Plan)

High Art, LLC. processing plan of cultivated cannabis consists of:

1. Harvesting of cannabis is anticipated to occur twice (2) a year;

2. Drying of harvested cannabis shall occur in two appurtenant drying facilities;

3. Processing of cannabis shall occur off-site utilizing a licensed processor;

4. Dried cannabis shall be weighed, packaged, labeled, and distributed to licensed dispensaries or distributors, as allowable under California law and Humboldt County Code, and shall adapt as changes occur.

5. High Art, LLC maintains a BCC Self-DTO license for the purpose of transporting the cannabis to and from the processor and or distributor and or retailer as is needed.

High Art, LLC. 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 meeting all

MAUCRSA and Humboldt County Code requirements;

2. Prevention practices shall be implemented against the contamination or growth of E. coli, mold,

mildew, or other microbiological agents upon or within processed cannabis;

3. Nitrile gloves and paper facemasks shall be used at all times;

4. Facemasks and gloves shall be in good operable condition; and,

5. Hands shall be sufficiently clean using sanitary methods of soap and hot water and/or hand sanitizer before initially handling cannabis, after using a restroom, or taking part in an activity which may

introduce contamination. Parking is available for workers at the relocation area. Likewise, there is parking at the compost/trash containment location. When the residence is constructed, there will be three parking spaces designated as dedicated to the home. CalFIRE turnouts and turnarounds are also

present on the property and access roads.

Security Plan (2017 Ops Plan)

High Art, LLC. shall secure the cultivation area and associated activities using the following means:

1. An independent risk assessment shall be undertaken within one (1) year and implemented;
2. Passive security system;
3. The cultivation site shall be secured behind primary locked fourteen feet (14') wide gate;
4. Cultivation shall be visually obscured.
5. The appurtenant drying facilities shall be secure lockable structures; and,
6. Operations shall be discreet, nor a nuisance, and not draw attention
7. Motion sensors, game cameras, two-way radios, and cell phone booster is on site
8. 3rd party security services are provided by Omni Security

Energy Plan

Solar power is used for the well pump. Generator use is minimized. Generators are used for drying: powering fans, dehumidifiers and household lighting. Other power sources are not necessary for cannabis operations. The Biological report states: "Generator use at the site will be minimal, estimated at approximately 1 month per year during fall harvest for operating fans and dehumidifiers in the drying shed. The Honda 3000 generator will be housed within a constructed, insulated and ventilated shed to attenuate noise." The relocation will have a proposed generator structure to provide secondary containment for the generator as well as noise attenuation. A propane tank will be proposed with the construction of the residence.

Noise Source Assessment and Mitigation Plan

The only significant noise source is the 3,000 Kw generator. The Honda EU3000I is rated at 50-57 DBA under a normal operating load and the noise attenuation shed will bring this down to well below 50 DBA at 100 feet from the noise source. An additional generator will be utilized once the proposed residence is constructed; size and type TBD. Noise assessment shall be performed with a decibel meter app to measure noise at source and 100 feet from the generator. This will be reference data if the relocation is approved since it is presumed that the generator containment structure will be established prior to the need for generator use in July, 2020. If the permanent containment structure is not anticipated to be in place when the generator use becomes necessary, then a temporary noise-dampening structure will be utilized.

Light Pollution Control Plan

No supplemental lighting is used in the cultivation process. Interior household light bulbs (100W) are used in the drying buildings and cabin structures. All security motion sensor lights are downcast. Sufficient lighting to maintain proper growth cycle will be used in the ancillary propagation area only. At any time lights are run in the ancillary propagation area from sunset to sunrise light shielding covering will be implemented. Conformance with international dark sky standards will be maintained.