

ATTACHMENT 1B

Cultivation and Operations Plan



Operating Policy and Procedures Lower Thomas Road, LLC.

Revision Number: 2.00

Revision Date: January 28, 2020

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Revision History

Revision	Date	Author	Summary
1	5/20/20	J.H.	Added section 6.3.6 Mixed Lighting
2	5/20/20	J.H.	Added section 23.1 through 23.4 Cultivation Area Detail
3	5/20/20	J.H.	Added section 23.5 Housing Area and updated section 7 to include on-site housing information.
4	5/20/20	J.H.	Updated cultivation areas and zones to match site map section 5.31 Weekly Water Use, 6.1 Cultivation Zones, 6.3.5 Cultivation Cycles
5	6/11/20	J.H.	Updated cultivation areas to indicate square footage for each area in section 6.1
1.02	7/20/20	J.H.	Corrected sections with reference to retail licenses
1.03	2/25/2019	J.H.	Section 6.1: Corrected dimensions for EGH 1 & 2
1.03	2/25/2019	J.H.	Section 5.1 Water Source & Storage: Added location of spring box (POD #1) and a description of water distribution system
1.03	2/25/2019	J.H.	Section 5.2 Water Storage: Added location information of each tank and corrected error by adding in missing tank B
1.03	2/25/2019	J.H.	Section 5.2.3 Water Meters: Added table of meters which includes location description and purpose of meter.
1.03	2/25/2019	J.H.	Section 8. Disposal of Cannabis Waste: Updated to reflect that all cannabis wastes are composted.
1.03	2/25/2019	J.H.	Section 9. Distribution Transfers. Updated to reflect current process with CalOrigins
1.03	3/04/2019	J.H.	Section 6.7 Pest Management: Updated section to include type and active ingredients.
2.00	2/01/2020	J.H.	Section 5.1, updated water sources and added documentation of the well installed in 2019
2.00	2/01/2020	J.H.	Section 5.2, updated documentation on the location of the storage tanks D & E. Documented new tanks L & M.
2.00	2/01/2020	J.H.	Section 5.3, updated the irrigation plan included weekly and monthly chart. Add the source of water to the monthly chart
2.00	2/01/2020	J.H.	Section 6.1, updated the cultivation plan
2.00	2/01/2020	J.H.	Section 6.3.3, updated the 2020 plan to have harvest dried offsite by a licensed third party
2.00	2/01/2020	J.H.	Section 6.3.5, updated cultivation cycles.
2.00	2/01/2020	J.H.	Section 6.5.1, updated power generation by adding noise mitigation information. Corrected model number of gen-1, Classified gen-3 as a backup to gen-2
2.00	2/01/2020	J.H.	Section 6.5.2, updated status and use of gen-3
2.00	2/01/2020	J.H.	Section 6.5.3, added section on noise mitigation technology to be used.
2.00	2/01/2020	J.H.	Section 6.6, updated the 2020 plan to have harvest processed offsite by a licensed third party.
2.00	2/01/2020	J.H.	Section 7.3, added section to include staffing levels and location

2.00	2/01/2020	J.H.	Section 9 Distribution Transfers. Updated to section to current process with Metric
2.00	2/01/2020	J.H.	Section 16, updated with use of Metric
2.00	2/01/2020	J.H.	Section 21, updated all site maps
2.00	2/01/2020	J.H.	Section 23, updated schedules to reflect changes to areas 1 & 2

1. Premises Definitions

1.1 Identification of Property

1.1.1 Permits & Licenses

County Application: 12214

State License: Type: Temporary-Small Outdoor Tier-1

License Number: TAL20-0000657

1.1.2 Location

Property Location: 3556 Lower Thomas Road, Miranda, CA 95553

APN: 219-041-012

1.1.3 Public Area

There are no public areas on the property

1.1.4 Private Area

The private area is the residence and vegetable garden and other areas not associated with cannabis cultivation.

1.1.5 Limited Access

These areas include the nursery, green house, canopy areas where cannabis is germinated, cloned and cultivated. These areas will only be accessible to employees and escorted visitors. Harvested cannabis and cannabis waste can be stored in these areas during business hours. Harvested cannabis and cannabis waste products cannot be stored in these areas during non-business hours. Cannabis can be destroyed in these areas during business hours.

1.1.6 Restricted Access

This area is for storage of harvested cannabis for purposes of drying and storage prior to transfer to distributors. Cannabis waste must be stored in these areas. Another area that is classified as restricted access is the security room.

2. Mission Statement

2.1 Management Statement

2.2 Objective

This Policy and Procedure (the “Policy”) specifies Lower Thomas Road, LLC.’s (“Cultivator”) approved policies and procedures for the cultivation of cannabis for both Adult Use and Medical Use. All Owners and Employees are required to understand and comply with the policies and procedures.

2.3 Scope

- a) Cultivation Plan
- b) Water Management Plan
- c) Waste Management Plan
- d) Security Plan
- e) Employee Manual
- f) Humboldt County Code
- g) California Code of Regulations, Title 3, Division 8

3. Compliance with Policies & Procedures

3.1 Compliance Mandatory

Compliance with these policies and procedures are required. All policies and procedures mandatory unless circumstances arise where in the best judgement of the individual, human safety may be at risk.

3.2 Notification for Non-Compliance

All violations of the policy must be reported to management immediately.

3.3 Access to Records by City or County Manager, State Regulators and Law Enforcement

The following records are accessible by government officials.

Record Type	
Personnel Records	Permits, Licenses, other authorizations required by statute or regulation
Financial Records	Community Compliant Records
Visitor Logs	Inventory System Records
Cannabis Waste / Disposal Records	Surveillance Recordings
Training Records	Contracts covered by statute & regulation
Inventory Reconciliation / Audit reports and logs	

3.4 Access to Premises by City or County Manager, State Regulators and Law Enforcement

- a) Employees shall grant access to government officials providing government issued identity documents.
- b) If an employee is unsure, they should contact local law enforcement to confirm the identity of the government officials.
- c) Employees are instructed to fully cooperate with law enforcement.

4. Approved Enclosure for Cannabis Cultivation

4.1 Areas of the Premises

4.1.1 Subletting or Other Tenants

It is forbidden to sublet or otherwise rent any space that is part of the premises. This includes allowing independent parties to cultivate or process cannabis on the premises

4.2 Definition of Premises Areas

Area Name	Type	Age Restriction	Cannabis Processing	Cannabis Cultivation	Cannabis Drying	Cannabis Wastes Processing
Residence	Private	None	Not Allowed	Not Allowed	Not Allowed	Not Allowed
Cultivation	Limited-Access	Yes 21 Years	Not Allowed	Allowed	Only during business hours	Only during business hours
Nursery	Limited-Access	Yes 21 Years	Not Allowed	Allowed	Only during business hours	Only during business hours
Cannabis Drying	Limited-Access	Yes 21 Years	Not Allowed	Allowed	Allowed	Not Allowed
Cannabis Composting	Limited-Access	Yes 21 Years	Not Allowed	Not Allowed	Not Allowed	Allowed
Cannabis Waste Processing & Storage	Restricted-Access	Yes 21 Years	Not Allowed	Not Allowed	Not Allowed	Allowed
Cannabis Dry or Wet Storage	Restricted-Access	Yes 21 Years	Not Allowed	Not Allowed	Allowed	Not Allowed
Security Rooms	Restricted-Access	Yes 21 Years	Not Allowed	Not Allowed	Not Allowed	Not Allowed
Pesticide & Fertilizer Storage	Private	None	Not Allowed	Not Allowed	Not Allowed	Not Allowed
Soil Storage	Private	None	Not Allowed	Not Allowed	Not Allowed	Not Allowed

4.3 Identification Badges

- a) Visitor
- b) Farm Manager
- c) Head Cultivators
- d) Seasonal Farm Labor

4.3.1 Badge Display Requirements

- a) All Company staff and contractors are required to wear badges that are clearly visible at all times while in Limited-Access and Restricted-Access areas of the premise. These badges clearly identify staff and contractors.
- b) All visitors are required to wear badges that are clearly visible while in Limited-Access and Restricted-Access areas. These badges clearly identify visitors.
- c) All personnel are not required to wear a badge while in the delivery areas.

4.3.2 Visitor Procedures

- a) All visitors to the premises must report to the receptionist and sign in to receive a badge before any further access is granted. Visitors must be admitted to Company premises only for specific authorized purposes. Visitors must surrender the badge before they leave.
- b) Visitors are not permitted to access the Restricted-Access areas unless special permission and authorization has been received from the Farm Manager. Such visitors must be escorted by staff at all times.
- c) Visitors who are contractors, repair personnel, telephone personnel, emergency workers and other authorized non-Company workers, who are required to enter related areas (including the secure areas), to perform authorized work must be escorted to and from that place of work by staff.

4.3.3 Visitor log

All visitors to the premises must sign in and out of the visitor log. The following information is required for each visit:

- a) Visitor Full Name
- b) Type of Government ID Presented
- c) Government ID Number

- d) Purpose and Person Visiting
- e) Date and Time of Arrival
- f) Date and Time of Departure

4.3.4 **Lost Badges**

If an employee or contract loses their assigned badge they must immediately report the loss to the manager or assistant manager.

4.4 Business Hours

The Farm is open for business seven days a week. The store is closed for business on specified holidays

Business Schedule

Day of Week	Opening Time	Closing Time	Hours of Operation
Monday	8:00 AM	8:00 PM	12
Tuesday	8:00 AM	8:00 PM	12
Wednesday	8:00 AM	8:00 PM	12
Thursday	8:00 AM	8:00 PM	12
Friday	8:00 AM	8:00 PM	12
Saturday	8:00 AM	8:00 PM	12
Sunday	8:00 AM	8:00 PM	12

4.4.1 After Hours Access

- a) Only employees, security guards and authorized visitors are allowed in the premises during none business hours.

4.5 Definition of Areas

4.5.1 Public Area

There are no public areas on the property.

4.5.2 Private Area

The private area is the residence and vegetable garden and other areas not associated with cannabis cultivation.

4.5.3 Limited Access Area

These areas include the nursery, green house, canopy areas where cannabis is germinated, cloned and cultivated. These areas will only be accessible to employees and escorted visitors. Harvested cannabis and cannabis waste can be stored in these areas during business hours. Harvested cannabis and cannabis waste products cannot be stored in these areas during non-business hours. Cannabis can be destroyed in these areas during business hours.

4.5.4 Restricted Access Area

This area is for storage of harvested cannabis for purposes of drying and storage prior to transfer to distributors. Cannabis wastes must be stored in these areas. Another area that is classified as restricted access is the security room.

4.6 Age Requirements for Access

- a) Employee: with Company ID Badge (Employees and Contractors must provide proof of age requirement to obtain Company ID Badge. Must provide government ID proving at least 21 years of age.
- b) Visitor: with government ID proving at least 21 years of age.

4.7 Cannabis Storage Restrictions

- a) Only persons that meet the age requirements of twenty-one years of age or older may have access to Limited-Access and Restricted-Access areas.
- b) During Business Hours - Cannabis products can only be stored in Limited-Access and Restricted-Access areas.
- c) During Non-Business Hours - All cannabis must be stored in the Restricted-Access areas.
- d) Cannabis products may only be taken out of the Limited-Access areas for the purposes of transfer to Distributor or destruction following the Cannabis Destruction Policy & Procedures.
- e) Cannabis products cannot be stored outdoors or in Private areas.
- f) Cannabis goods delivered to or for deliver to this premise cannot be stored at any other location.

4.8 Processing

Cannabis processing is not authorized on this property. All harvested cannabis in either dried or wet form is transferred to an approved licensed distributor.

4.9 Cannabis Returns

Accepting returns after transferring to another licensee is strictly prohibited.

5. Water Management Plan

5.1 Water Source and Storage

- The primary source of irrigation water is well water located in the upper quadrant of the Plot Plan. The well is located at 40.2002 latitude / 123.8759 longitude and was drilled in 6/20/2019 to a depth of 180 feet. The well is rated to produce one (1) gallons of water per minute or 10,080 gallons per week. Water from the well is pumped to tank H, I, J, K, A & B and flows to tank C, D and E for distribution.
- Tanks D & E gravity feed cultivation area 2. Tank C is pumped up to tanks F & G which then gravity feeds tanks H, I, J, K, A & B.
- Tanks H, I, J, K, A & B provide storage for the premises and irrigation for cultivation area 1.
- A secondary purpose of tanks F & G is to provide water pressure for the irrigation system.
- The secondary source of irrigation water is surface water diversion from an unnamed spring at the headwaters of a Class I stream that is tributary to Bogus Creek which is a tributary to South Fork Salmon Creek. The spring box (POD #1) is located at 40° 11' 58" North, 123° 52' 29" West. The water is gravity feed to tank C.
- There are four meters installed to record irrigation water usage. Each tank is equipped with a mechanical (float) shut off valve to prevent overflowing.
- There is one meter to record domestic water use. This meter was installed in 2020.

5.2 Water Storage

Water Storage

Label	Type	Capacity	Water Source		Fill Method	Location	Status
A	Hard Tank	500	POD #1		Gravity	40° 11' 59" North 123° 52' 29" West	Active
B	Hard Tank	500	POD #1		Gravity	40° 11' 59" North 123° 52' 29" West	Active

C	Hard Tank	1,010	POD #1		Gravity	40° 11' 57" North 123° 52' 30" West	Active
D	Hard Tank	3,000	POD #1		Gravity	40 11' 50" North 123 52' 31" West	Active
E	Hard Tank	3,000	POD #1		Gravity	40 11' 50" North 123 52' 31" West	Active
F	Hard Tank	3,000	POD #1		Pump	40° 12' 3" North 123° 52' 27" West	Active
G	Hard Tank	3,000	POD #1		Pump	40° 12' 3" North 123° 52' 27" West	Active
H	Hard Tank	5,000	POD #1		Gravity	40° 11' 59" North 123° 52 '29" West	Active
I	Hard Tank	5,000	POD #1		Gravity	40° 11' 59" North 123° 52 '29" West	Active
J	Hard Tank	5,000	POD #1		Gravity	40° 11' 59" North 123° 52 '29" West	Installed prior to 5/15
K	Hard Tank	5,000	POD #1		Gravity	40° 11' 59" North 123° 52 '29" West	Installed prior to 5/15
L	Hard Tank - Rain Catchment	4,700	Rain		Rain	40 11' 60" North 123 52' 33"West	Active
M	Hard Tank - Rain Catchment	4,700	Rain		Rain	40 11' 60" North 123 52' 33"West	Active

5.2.1 Expansion of Water Storage Capacity

No expansion of water storage is required as the well produces 10,080 gallons of water per week during the forbearance period and maximum water used is 9,576 gallons per week. The current tank farm has a total capacity of 43,000 gallons.

5.2.2 Rain Water Catchment

The property is in the process developing a plan to catch rainwater of a planned structure over the hard water storage tanks. The water will be stored in above ground hard tanks. The first phase was the installation of two 4,700 gal. rain catchment tanks L & M.

5.2.3 Water Meters

Meter	Location	Purpose
1	Between Tanks D & E & Cultivation Area #2	Measure water delivered to Cultivation Area #2 & domestic use
2	Between Tanks F & G and Tanks A, B, H, I, J & K	Measure water delivered to Cultivation Area #1
3	Between POD #1 and Tanks C	Measure total water diverted from POD #1
4	Well Next to Tank H	Measure total water pumped from the well
5	Next to Yurt on Distribution Line #6	To measure domestic use

5.3 Irrigation Plan

Irrigation water is applied at agronomic rates to minimize over watering cannabis plants and reducing the risk of irrigation runoff. Irrigation is applied through traditional drip irrigation and by hand watering using a spray stick or wand. Irrigation occurs in the morning/early evening hours to reduce evaporative loss. Ground cover and weed barrier is used to minimize weed growth, which reduces water loss during watering. Natural soil amendments are used to aid in soil moisture retention as part of irrigation plan. Irrigation frequency is based on weather conditions and varies from one time to three times per week.

5.3.1 Weekly Water Use (Estimated)

See cultivation areas for description of each area.

Date	Week #	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total	Ave per Day
3/23/20	13	0	0	0	0	0	0	0
3/30/20	14	0	0	0	191	0	191	27
4/6/20	15	0	0	0	191	0	191	27
4/13/20	16	0	0	0	191	0	191	27
4/20/20	17	0	0	0	191	0	191	27
4/27/20	18	0	0	0	191	0	191	27
5/4/20	19	0	512	0	191	0	702	100
5/11/20	20	0	512	0	191	0	702	100
5/18/20	21	2,046	512	0	191	0	2,748	393
5/25/20	22	2,046	512	0	191	0	2,748	393
6/1/20	23	2,046	512	0	191	0	2,748	393
6/8/20	24	2,728	682	0	254	0	3,664	523
6/15/20	25	2,728	682	0	254	0	3,664	523
6/22/20	26	2,728	682	0	254	0	3,664	523
6/29/20	27	2,728	682	1,560	254	1,160	6,384	912
7/6/20	28	4,092	1,023	2,340	381	1,740	9,576	1,368
7/13/20	29	4,092	1,023	2,340	381	1,740	9,576	1,368
7/20/20	30	4,092	1,023	2,340	381	1,740	9,576	1,368
7/27/20	31	4,092	1,023	2,340	381	1,740	9,576	1,368
8/3/20	32	4,092	1,023	2,340	381	1,740	9,576	1,368
8/10/20	33	4,092	1,023	2,340	381	1,740	9,576	1,368
8/17/20	34	4,092	1,023	2,340	381	1,740	9,576	1,368
8/24/20	35	4,092	1,023	2,340	381	1,740	9,576	1,368
8/31/20	36	4,092	1,023	2,340	381	1,740	9,576	1,368
9/7/20	37	2,728	682	1,560	254	1,160	6,384	912
9/14/20	38	2,728	682	1,560	254	1,160	6,384	912
9/21/20	39	2,728	682	1,560	254	1,160	6,384	912
9/28/20	40	2,728	682	1,560	254	1,160	6,384	912
10/5/20	41	2,046	512	1,170	191	870	4,788	684
10/12/20	42	0	0	0	0	0	0	0
Total		66,836	17,732	30,030	7,557	22,330	144,485	

5.3.2 Monthly Water Use (Estimated)

Month	Total Use	Well	Storage
January	0	0	0
February	0	0	0
March	191	191	0
April	762	762	0
May	6,900	6,900	0
June	20,124	20,124	0
July	38,304	38,304	0
August	47,880	47,880	0
September	25,536	25,536	0
October	4,788	4,788	0
November	0	0	0
December	0	0	0
Total	144,485	144,485	0

6. Cultivation Plan

6.1 Cultivation Zones

Cultivation Areas	Water Zones	Description (measurements are full extent of cultivation per county definition)	Total Sq. Ft.	Sup. Light	Cultivation Type	Floor
Area-1 EGH-1	Zone-1	16'x50' (raised beds under hoops) 800 sq. ft.	800	Yes	Mixed Light Tier-1	Pervious
Area-1 EGH-2	Zone-1	16'x50' (raised beds under hoops) 800 sq. ft.	800	Yes	Mixed Light Tier-1	Pervious
Area-1 EGH-3	Zone-1	16'x50' (raised beds under hoops) 800 sq. ft.	800	Yes	Mixed Light Tier-1	Pervious
Area-1 EGH-4	Zone-1	16'x50' (raised beds under hoops) 800 sq. ft.	800	Yes	Mixed Light Tier-1	Pervious
Area-1 EGH-5	Zone-1	16'x50' (raised beds under hoops) 800 sq. ft.	800	Yes	Mixed Light Tier-1	Pervious
Area-1 EGH-6	Zone-1	16'x50' (raised beds under hoops) 800 sq. ft.	800	Yes	Mixed Light Tier-1	Pervious
Area-1 EGH-7	Zone-2	20'x60' (under hoops) 1200 sq. ft.	1,200	Yes	Mixed Light Tier-1	Pervious
Area-2 EGH-1	Zone-3	10'x28' (raised beds) 280 sq. ft.	280	No	Outdoor	N/A
Area-2 EGH-2	Zone-3	10'x28' (raised beds) 280 sq. ft.	280	No	Outdoor	N/A
Area-2 EGH-3	Zone-3	10'x28' (raised beds) 280 sq. ft.	280	No	Outdoor	N/A
Area-2 EGH-4	Zone-3	10.5'x28' (raised beds) 294 sq. ft.	294	No	Outdoor	N/A
Area-2 EGH-5	Zone-3	10.5'x26' (raised beds) 273 sq. ft.	273	No	Outdoor	N/A
Area-2 EGH-6	Zone-3	10'x25' (raised beds) 250 sq. ft.	250	No	Outdoor	N/A
Area-2 EGH-7	Zone-3	15'x25' (raised beds) 375 sq. ft.	375	No	Outdoor	N/A
Area-2 EGH-8	Zone-4	16'x28' (raised beds under hoops) 448 sq. ft.	448	yes	Mixed Light Tier-1	Pervious
Area-2 EGH-9	Zone-5	12'x67' (31 60 gal. pots) 804 sq. ft.	804	No	Outdoor	N/A
Area-2 EGH-10	Zone-5	5'x15' (3 60 gal. pots) 75 sq. ft.	75	No	Outdoor	N/A
Area-2 EGH-11	Zone-5	11.5'x55' (5 8'x8' boxes) 632.5 sq. ft.	633	No	Outdoor	N/A

Totals

Full Term Cultivation	9,992 sq. ft.
Nursery Only	None
Total	9,992 sq. ft.

Mixed Light	6,448 sq. ft.
Outdoor	3,544 sq. ft.
Total	9,992 sq. ft.

6.2 Logging and Track & Trace

Each step of the cultivation is logged in journals and entries made as in to track and trace as required by county and state regulations.

6.3 Cultivation Activities

The cultivation areas under the hoops are used for both nursery and full-term cultivation. Both light augmentation and light deprivation techniques are used. Please see the cultivation schedule for additional details.

6.3.1 Nursery

The operation creates clones and also purchases clones from licensed nurseries. The clones are planted in four-inch pots and placed in the greenhouse for approximately three weeks prior to being transplanted into one gallon pots for an additional three to four weeks. Light augmentation is used during this period to enhance growth. All plants are tracked in lots with a UID and registered in the logs. Once the vegging stage is complete the plants are transferred into the light deprivation cultivation areas.

6.3.2 Full Term

Plants placed into the light deprivation cultivation cycle are all tagged with a UID tag. In the hooped areas light augmentation is provided for the first seven to ten days. Both thirty-gallon pots and planting beds are used.

6.3.3 Harvest

Harvesting will be conducted by a licensed third party and dried offsite.

6.3.4 Farm Worker Postings

We post all safety standards and operations procedures in binders throughout the property for the employees to reference to. All employees are required to read the binders and become familiar with all operations and procedures. In the binders employees will find farm manuals from DBS that we require logging in our daily activities such as foliar sprays, pest management, feeding

regimens; root drench and compost teas. Employees are required to date and initial everything that is done.

6.3.5 Cultivation Cycles

All information is estimated and may vary based on weather conditions

Zone	Cycle	Cultivation Type	Week Start	Week End	Supplemental Lighting
Zone-1	1	Light Depravation	5/18/20	7/27/20	First 10 days
Zone-1	2	Light Depravation	8/03/20	11/09/20	First 10 days
Zone-2	N/A	Veg (Nursery)	5/04/20	5/11/20	All Days
Zone-2	1	Light Depravation	5/18/20	7/27/20	First 10 days
Zone-2	2	Light Depravation	8/03/20	11/09/20	First 10 days
Zone-3	1	Light Depravation	6/29/20	11/09/20	None
Zone-4	N/A	Veg (Nursery)	3/30/20	6/22/20	All Days
Zone-4	1	Light Depravation	7/2/20	10/8/20	First 10 days
Zone-5	1	Outdoor	6/29/20	11/09/20	None

Supplemental lighting cycle is from Dusk to 1 AM.

6.3.6 Mixed Lighting – Light Augmentation

No light augmentation is used during full term cultivation cycle on mature plants.

Ten watt LED lights are used during the vegging cycle on immature plants. The lights are space on per ten feet down the center line of each nursery and hoop house. Please see section 6.1 Cultivation Zones for information on where light augmentation is used and section 6.3.5 Cultivation Cycles for information on when the light augmentation is used.

Tarps are used to mitigate supplemental lighting in compliance with Lighting Zone 0 and Lighting Zone 1. The application of the tarps is designed to mitigate light spillage onto neighboring properties resulting from backlight, uplight, or glare. Tarps are used from dusk to 1 AM.

Zone	Description
LZ0: No ambient lighting	Areas where the natural environment will be seriously and adversely affected by lighting. Impacts include disturbing the biological cycles of flora and fauna and/or detracting from human enjoyment and appreciation of the natural environment. Human activity is subordinate in importance to nature. The vision of human residents and users is adapted to total darkness, and they expect to see little or no lighting. When not needed, lighting should be extinguished.
LZ1: Low ambient lighting	Areas where lighting might adversely affect flora and fauna or disturb the character of the area. The vision of human residents and users is adapted to low light levels. Lighting may be used for safety, security and/or convenience but it is not necessarily uniform or continuous. After curfew, most lighting should be extinguished or reduced as activity levels decline.

6.4 Soil Management

All imported soil and soil amendments are recycled and stored in conformance county and state regulations. Soils are stored so that amendments cannot leach into any surface water streams. From. At the end of the growing season all imported soil will be gathered and tested. Amendments will be added to the soil. The soil will then be stored for the next cultivation season.

6.5 Power

Power Sources

All power is generated on the property. There is a solar panel generate system on the property that charges battery-based storage system. The Generator-1 (propane) automatically turns on when the power storage is below a minimal level. The solar system provides power for domestic and cultivation uses. During the winter months the Pelton Wheel-1 augments power generation for the solar panel generation system.

6.5.1 Power Generation

Type	Model	Fuel	Amps (120V)	kW	Decibels - Sound (no mitigation)	Sound Mitigation
Pelton Wheel-1		N/A	N/A	N/A	N/A	N/A
Solar-1		N/A	N/A	N/A	N/A	N/A
Inverter-1 - Battery Storage	Flexware PV Combiner FWPV-8	N/A	N/A	N/A	N/A	N/A
Generator-1	Kohler 6.5 RES	Propane	35	8.5	65 dB(A)	Zombie Box 49.5 dB(A) @ 3' 47.7 dB(A) @ 23'
Generator-2	Honda EU 6500	Unleaded Gasoline	45.8	5.4	60 dB(A)	Zombie Box 45.8 dB(A) @ 3' 44.0 dB(A) @ 23'
Generator-3 Backup Only	Honda EU 3000	Unleaded Gasoline	23	2.8	57 dB(A)	Zombie Box 43.5 dB(A) @ 3' 41.8 dB (A) @ 23'

6.5.2 Generator Schedule

Label	Notes	Start	End
Generator-1	Available to run 24 hours a day to charge batteries when solar is not available.	12:00 AM	12:00 AM
Generator-2	Limited use. Used for providing light augmentation. See Cultivation Cycles	Sun Set	1:00 AM
Generator-3	Backup for Generator-2 only.	Sun Set	1:00 AM

6.5.3 Generator Noise Mitigation

Generators-1 and Generator-2 are placed in special noise control systems which reduce the decibels by 22% at 3 feet and 23% at 23 feet. The noise mitigation enclosures are manufactured by ZombieBox International.

6.6 Processing Plan

All processing will be off site.

6.7 Pest Management Plan

The integrated pest management plan includes the use of biological, chemical and cultural methods to control pests. The following pesticides are used during the cultivation process:

Pesticide / Method	Type	Active Ingredients / Method	Inert Ingredients
Arbico Organics Triple-Threat Combo Pro (or similar product)	Biologic	H. bacteriaphora, S. carpocapsae, and S. feltiae	
Botanigard	Biologic	Fungus, Beauveria bassiana strain GHA	
Grandevo WDG	Biologic	<i>Chromobacterium subtsugae</i> strain PRAA4-1 ^T and spent fermentation media 30%	
Plant Therapy	Chemical	Sodium Citrate < 2.5% Soybean oil 25 – 50% Isopropyl alcohol 15-35% Fatty acids, C8-C20 and C20-unsatd., potassium salts 15 – 35% Peppermint oil < 2.5% Citric Acid < 2.5%	Filtered water
Pure Crop 1	Chemical	Soybean oil 10% Corn oil 5%	Filtered water, glycerin, carrot, onion, orange, tallow root, vanillin (85%)
Sulfur	Chemical	Sulfur	
Destruction of Volunteer Plants	Cultural	Host weeds are removed on a weekly schedule from the planting beds	
Trap Crops	Cultural	Marigold, basil and nastarium plants are planted adjacent to the planting beds	

6.8 Pesticide Storage

Pesticides are stored in the Fertilizer Shed adjacent to Access Road #4.

7. Staffing

7.1 Staffing Roles

Title	Primary Work Location	Primary Role	Backup Role
Farm Manager	3556 Lower Thomas Road, Miranda, CA 95553	<ul style="list-style-type: none"> • Compliance • Track & Trace Alert Management • Inventory Management (Track & Trace) 	<ul style="list-style-type: none"> • Cultivation • Waste Management
Head Cultivator	3556 Lower Thomas Road, Miranda, CA 95553	<ul style="list-style-type: none"> • Cultivation • Harvesting • Waste Management • Transplanting, harvesting, greenhouse and plot preparations 	<ul style="list-style-type: none"> • Compliance • Track & Trace Alert Management • Inventory Management (Track & Trace)
Seasonal	3556 Lower Thomas Road, Miranda, CA 95553	<ul style="list-style-type: none"> • Transplanting, harvesting, greenhouse and plot preparations 	<ul style="list-style-type: none"> •
Office Manager	5666 La Jolla Blvd. Suite 270 San Diego, CA 92037	<ul style="list-style-type: none"> • Financial Records • Contracts 	<ul style="list-style-type: none"> •

7.2 On-Site Housing

The Farm Manager and Head Cultivator live on site

7.3 Staffing Plan

Role	Head Count	Status	Location
Farm Manager	1	Full Time	On Site
Head Cultivator	1	Full Time	On Site
Seasonal	2	80 hours	On Site
Office Manager	1	Offsite	

8. Disposal of Cannabis Waste

8.1 Cannabis Waste Diversion Prohibition

All cannabis designated for destruction must all be destroyed and can never be otherwise consumed or transferred except as described in this policy. Any cannabis products designated for destruction otherwise consumed is considered a theft.

8.2 Destruction of Cannabis Prior to Disposal

- a) All plants with an UID will be updated in the inventory system as being destroyed.
- b) All plant material without a UID will be weighed and logged.
- c) Destruction and disposal of cannabis required two parties to witness and log.
- d) All cannabis material will be chipped and composted prior to being classified as waste.

8.3 Cannabis Waste Management

- a) All cannabis waste is to be processed in Limited-Access areas.
- b) All cannabis waste shall be weighed and recorded in the waste log book.
- c) All cannabis waste shall be stored in the cannabis waste disposal container and stored only in the Restricted areas (storage room).
- d) All cannabis waste is ground and composted. Composting is performed in Cultivation Area 1.
- e) The Compost Area is located in Cultivation Area #1 and is 6' by 6' and enclosed in a fenced area.

9. Distributor Transfers

9.1 Shipping & Receiving Hours

Shipments may be received during business hours. Referred to section 4.3 Business Hours.

9.2 Non-Cannabis merchandise

Only storage containers may be received from distributors

9.3 Cannabis merchandise

Cannabis goods are limited to seeds, clones, mother plants, plants under cultivation, wet harvest and dry harvest merchandise.

9.3.1 Receiving & Returning Shipments of Inventory

- a) All commercial cannabis activity shall be conducted between entities that are licensed by the Bureau of Cannabis Affairs and the Department of Food & Agriculture (CalCannabis).
- b) All cannabis shipments to distributors are conducted in Limited-Access areas.
- c) Inventory cannot be transferred if the inventory and track and trace systems are not fully operational or a paper manifest is not completed.

10. Human Resources

10.1 Age Verification and Restriction

All applicants must be twenty-one (21) years of age to be eligible to apply for employment. Each applicant must fully complete the application, sign and date it. The applicants must provide identification that meets Acceptable Government Identity Documents Policy to the receptionist in the check in area for confirmation of age. The receptionists will attest if the applicant is or is not twenty-one (21) years of age on the application.

10.2 Compliance Responsibilities and Training Requirements

The following table identifies responsibilities and training requirements required by local and state statutes and regulations.

Title	Primary Role	Backup Role	Training Requirements
Farm Manager	Track & Trace Alert Management Inventory Management (Track & Trace) International Dark Sky Association Compliance	Cultivation Waste Management	Compliance Training State Mandated Track & Trace Training Inventory Management Training (Track & Trace)
Head Cultivator	Cultivation Harvesting Waste Management Transplanting, harvesting, greenhouse and plot preparations	Track & Trace Alert Management Inventory Management (Track & Trace) International Dark Sky Association Compliance	Compliance Training State Mandated Track & Trace Training Inventory Management Training (Track & Trace)
Seasonal	Transplanting, harvesting, greenhouse and plot preparations		
Office Manager	Financial Records Contracts		

11. Record Retention

11.1 Retention Requirements by Record Type

Record Type	Retention Policy	Storage Policy	Disposal Policy
Personnel Records		Business Office	Shred / Destroy
Financial Records	Seven Years	Business Office	Shred / Destroy
Inventory System Records	Seven Years	On Site & Business Office	Shred / Destroy
Inventory Reconciliation / Audits	Seven Years	On Site & Business Office	Shred / Destroy
Cannabis Waste / Disposal Records	Seven Years	On Site & Business Office	Shred / Destroy
Training Records	Seven Years	On Site & Business Office	Shred / Destroy
Contracts covered by statute & regulation	Seven Years	On Site & Business Office	Shred / Destroy
Permits, Licenses, other authorizations required by statute or regulation	Seven Years	On Site	Shred / Destroy
Surveillance Recordings	90 days	On Site / Offsite	Recycle

11.2 Record Classification and Storage

Records shall be kept in a manner that allows the records to be retrieved upon request by authorities.

All records shall be labeled including the following:

- a) Record Type
- b) Record Date Month, Date & Year
- c) Name of Parties

11.2.1 Archiving

All records shall be stored by record type in date order in boxes or file cabinets by year six months after the end of the prior calendar year.

11.2.2 Electronic Archiving

Electronic archiving is for seven years.

12. Incident Response

The purpose of the Safety and Incident Review Team (SIRT) is to report, identify and analyze safety related incidents that occur at premises. The objective is to properly document the incident, develop a plan to address the causes, to prevent a recurrence, monitor remedial actions taken by management, and provide city, county and state regulators with reports to be able to adequately evaluate the incident.

Upon discovery or notification of an incident, the Responsible Party will be responsible for classifying the incident by severity and type, as outlined in section 8.1 Incident Reporting Table below. This will guide the level of response and reporting. Following classification, an investigation will be conducted to determine the facts and circumstances surrounding the incident and whether all state laws, regulations, and the farm's policies and procedures were followed.

An Incident Report (IR) number will be generated for each incident and tracked in a database kept by the Director of Security. Standardized reports will be used to allow searchable forms and cross-report analysis.

The SIRT will consist of the Manager, Farm Manager and Director of Security. The team will meet on a quarterly basis and presents a report to the Board of Managers.

12.1 Incident Reporting Table

Incident Type IR Code	Responsible Party	Reporting Time Period	Report To:
Security Incidents			
Criminal Activity	Farm Manager	24 hours	Manager
Suspicious Activity	Farm Manager	24 hours	
Loss of Access to Track & Trace	Farm Manager	Incident report must be file before the end of shift	Bureau of Cannabis Control Manager
Discrepancy in Inventory	Farm Manager	Incident report must be file before the end of shift	Bureau of Cannabis Control Manager
Robbery	Farm Manager	Call 911 Immediately Incident report must be file before the end of shift	Local Law Enforcement Bureau of Cannabis Control Manager
Burglary	Farm Manager	Call local law enforcement Immediately Incident report must	Local Law Enforcement Bureau of Cannabis Control Manager

		be file before the end of shift	
Security System Failure	Farm Manager	Incident report must be file before the end of shift	Manager
Employee Injury	Farm Manager	Incident report must be file before the end of shift	Manager
Track & Trace			
Compliance Notification	Farm Manager	24 hours	Bureau of Cannabis Control Manager
Neighbored Complaints			
Light Spillage / Pollution	Farm Manager	24 hours	Manage

13. Maintenance of Posting on Premises

13.1 License Posting

- a) Copies of the current license shall be posted on the entrance of cultivation area-1 and area 2.

13.2 Notice of Revocation

- a) A licensee whose license has been revoked shall conspicuously display a notice on the exterior of the licensee's premises indicating that the license has been revoked. The notice shall remain continuously on the licensed premises for at least 15 calendar days.

14. Approved Vendor List

14.1 Vendor List

Vendor Name	Type	Address	Contact Name	Phone

14.1.1 Vendor Types

- 1) Armored Car Service
- 2) Auditors
- 3) Distributors Cannabis
- 4) Distributors Non-Cannabis
- 5) Information Systems
- 6) Security Guards
- 7) Security Systems
- 8) Utilities

14.2 **Approved Distributors**

Distributor Name	Contact Person	Contact Phone #	Contact email
TBD			

15. For Future Use

Page intentionally blank

16. Inventory Management

Lower Thomas Road, LLC has been issued a Metric account from CalCannabis. The farm manager and staff have been trained in using the system. All plants have been tagged and are tracked in the system.

17. Regulatory Notifications

The Manager and Farm Manager are responsible for all regulatory notifications.

17.1 Regulatory Notification Response

Incident Type	Reporting Time Period	Receiving Agency
Notification of Criminal Acts	48 hours	Bureau of Cannabis Control
Notification of Civil Judgements	48 hours	Bureau of Cannabis Control
Notification of Revocation of Local License, Permit or other required Authorizations	48 hours	Bureau of Cannabis Control
Notification of Theft, Loss and Criminal Activity	24 hours	Bureau of Cannabis Control Local Police or Sheriff Department
Request for Disaster Relief	24 hours	Bureau of Cannabis Control
Notification of Transfer of Inventory to Alternate Location (Disaster Relief)	24 hours	Bureau of Cannabis Control
Notification of Loss of Access to Track & Trace	72 hours	Bureau of Cannabis Control
Notification of Track & Trace Compliance		
Notification of Discrepancy in Inventory	24 hours	Bureau of Cannabis Control Local Police or Sheriff Department
Breach of Security	24 hours	Bureau of Cannabis Control Local Police or Sheriff Department
Amendment CRP Addendum, Business or Security Plan	10 business days	Bureau of Cannabis Control
Number of Employees Exceeds Nineteen	30 days	Bureau of Cannabis Control
Change of Owners	10 business days	Bureau of Cannabis Control
Change of Interested Parties or their status	10 business days	Bureau of Cannabis Control
Change in Location of Premises	Prior Approval Required	Bureau of Cannabis Control Local Police or Sheriff Department
Death or Incapacity of a Licensee	10 business days	Bureau of Cannabis Control Local Police or Sheriff Department

Physical Modification of Premises	Prior Approval Required	Bureau of Cannabis Control Local Police or Sheriff Department
Unresolved Compliance Notifications	Immediately	Bureau of Cannabis Control

17.2 Notifications

17.2.1 Notifications Criminal Activity

The notification to the Bureau pursuant to subsection (a) of this section shall be in writing and include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.

17.2.2 Notification of License or Local Permit Revocation

The written notification shall include the name of the local agency involved, a written explanation of the proceeding or enforcement action, and the specific violation(s) that led to revocation.

17.2.3 Notification of Civil Judgement

The written notification shall include the date of verdict or entry of judgement, the court docket number, the name of the court in which the matter was adjudicated, and a description of the civil penalty or judgement rendered against the licensee.

17.2.4 Notification of Criminal Conviction

The written notification to the Bureau shall include the date of conviction, the court docket number, the name of the court in which the licensee was convicted, and the specific offense(s) for which the licensee was convicted.

17.2.5 Disaster Relief

The licensee submits in writing to the Bureau within 10 business days of moving the cannabis goods a request for temporary relief that clearly indicates what statutory and regulatory sections relief is requested from, the time period for which the relief is requested, and the reasons relief is needed for the specified amount of time.

17.2.6 Breach of Security

17.2.7 Amendment CRP Addendum, Business or Security Plan

The notification shall identify the document and section being changed and include the full change with revision markings. The notification shall be signed by an owner

17.2.8 Change of Owners

A new license application is required

17.2.9 Change of Interested Parties or their status

When there is a change in persons with financial interest(s) in the commercial cannabis business that do not meet the requirements for a new license application under this section, the licensee shall submit the information required by sections 5002 (c)(19) and 5004 of this division to the Bureau within 10 business days of the change.

17.2.10 Death or Incapacity of a Licensee

In the event of the death, incapacity, receivership, assignment for the benefit of creditors of a licensee, or other event rendering a licensee incapable of performing the duties associated with the license, the licensee's successor in interest (e.g., appointed guardian, executor, administrator, receiver, trustee, or assignee) shall notify the Bureau in writing

17.2.11 Physical Modification of Premises

A licensee shall not, without the prior written approval of the Bureau, make a physical change, alteration, or modification of the licensed premises that materially or substantially alters the licensed premises or the use of the licensed premises from the premises diagram originally filed with the license application. A licensee whose premises is to be materially or substantially changed, modified, or altered is responsible for filing a request for premises modification with the Bureau.

Material or substantial changes, alterations, or modifications requiring approval include, but are not limited to, the removal, creation, or relocation of a common entryway, doorway, passage, or a means of public entry or exit, when such common entryway, doorway, or passage alters or changes Limited-Access areas within the licensed premises.

18. Change Control Policy and Procedure

18.1 Overview

In order to stay ahead of the ever-changing landscape of today's world, policies must adapt. This policy provides the framework for updating approved Company policies and procedures.

18.2 Purpose

This policy has been created to provide the guidelines for how to update Policies and Procedures and maintain compliance with local and state regulations.

18.3 Scope

The scope of this policy covers all updates, changes, and activities completed on approved Policies and Procedures. Only policies and procedures that have been approved are subject to this Policy.

18.4 Policy

No Policy is considered Approved and "In-Use" before following each step of this policy. When a Policy is to be updated or go through the approval process, the following steps must occur:

1. Tracking of all Changes
2. Updating Revision History
3. Logging of Document Versions
4. Review & Sign-Off of Management
5. Notification & Approval in with the Local and State Regulators

18.4.1.1 Tracking of Changes

In order to begin updating a policy and procedure, the first step is to ensure "track Changes" is ON, and to give the document a new title (changing of the date is the best way to accomplish this) as to not save over the old version which must be logged in its Approved format. Each policy will have the following versions:

- Change Version – Is a saved copy of all the "changes" that have been made to go from one policy version to the next. In this version of the document, do not Accept the changes.
- Working Approved – This is the version of the Policy in which the changes from one version to the next have been accepted. It is a working version of the updating policy for which the next versions changes will begin with.
- Disseminated In-Use- This is a saved PDF of the "Working Approved" version, only this version can be disseminated as to avoid changes that are unknown.

18.4.2 Revision History

Each new Working Approved policy and procedure should contain a detailed description in the Revision History of all changes that occurred from one version to the next. These changes will be the “Unaccepted” changes from the Change Version of the policy.

18.4.3 Logging

All the versions of each step (“Change Version”, “Working Approved”, and “Disseminated In-Use”) must be logged.

18.5 Review & Sign-Off of Management

Before a document can go from Working Approved to Disseminated In-Use, it must first receive the proper review and sign-off from one or more of the following:

- Company Manager
- Legal Counsel
- Director of Security
- Director of Regulatory Compliance

Once a Policy has received review and sign-off it is ready to be Disseminated In-Use.

18.6 Review & Approval of Regulators

If a policy or procedure has effect on the compliance of regulations or causes modification to a currently in effect plan on file with regulators those plans must be approved in writing by regulator office with jurisdiction.

18.7 Annual Review

The Company will conduct an annual review to ensure all Policies and Procedures are in their most updated format. This review ensures the policies for Document Change have been followed, and what looks into improvements can be made to the Document Change policy.

19. Training Agenda

Under Development

19.1 Track & Trace

19.2 Visitors

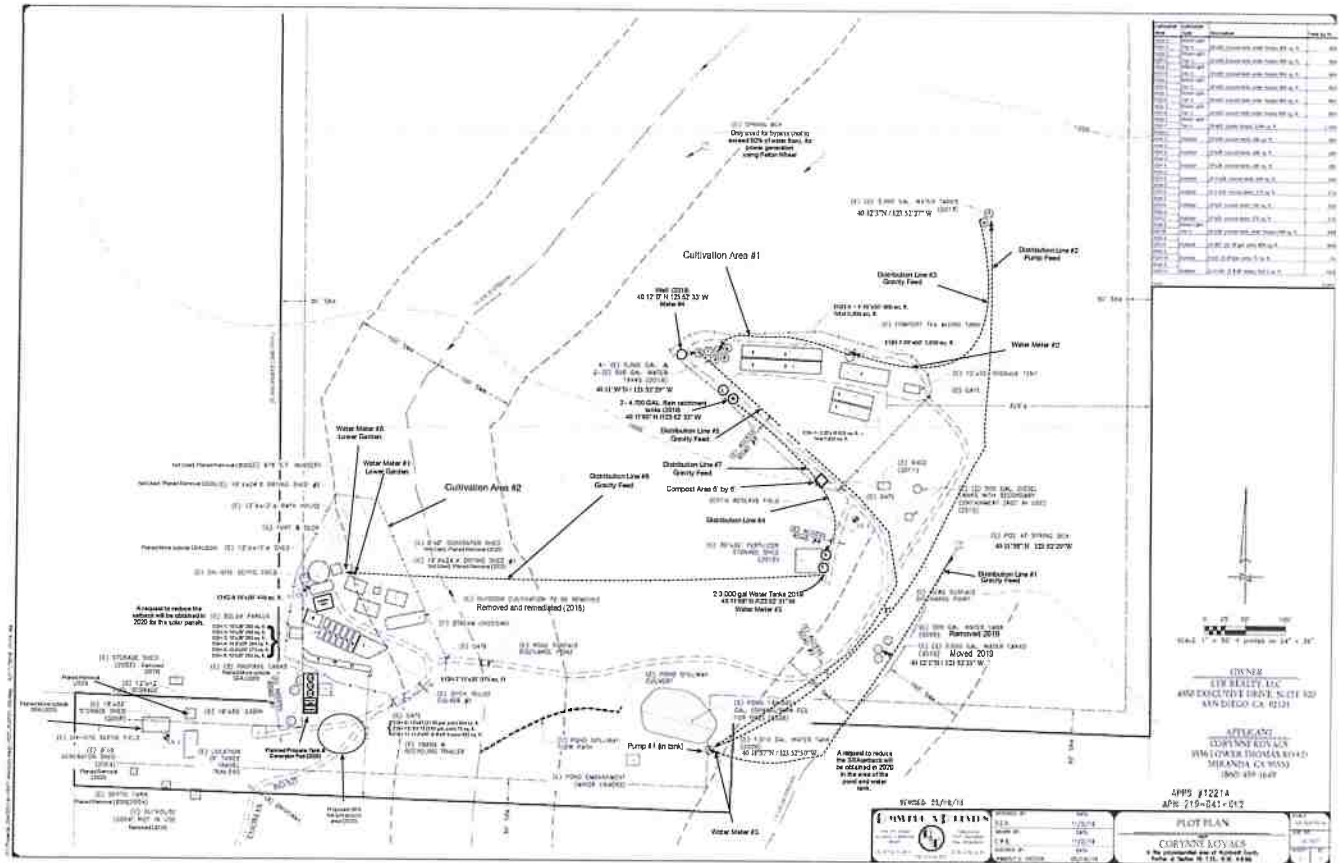
a) Present Government ID

19.3 Cannabis Waste Management

20. Approved Government Identification

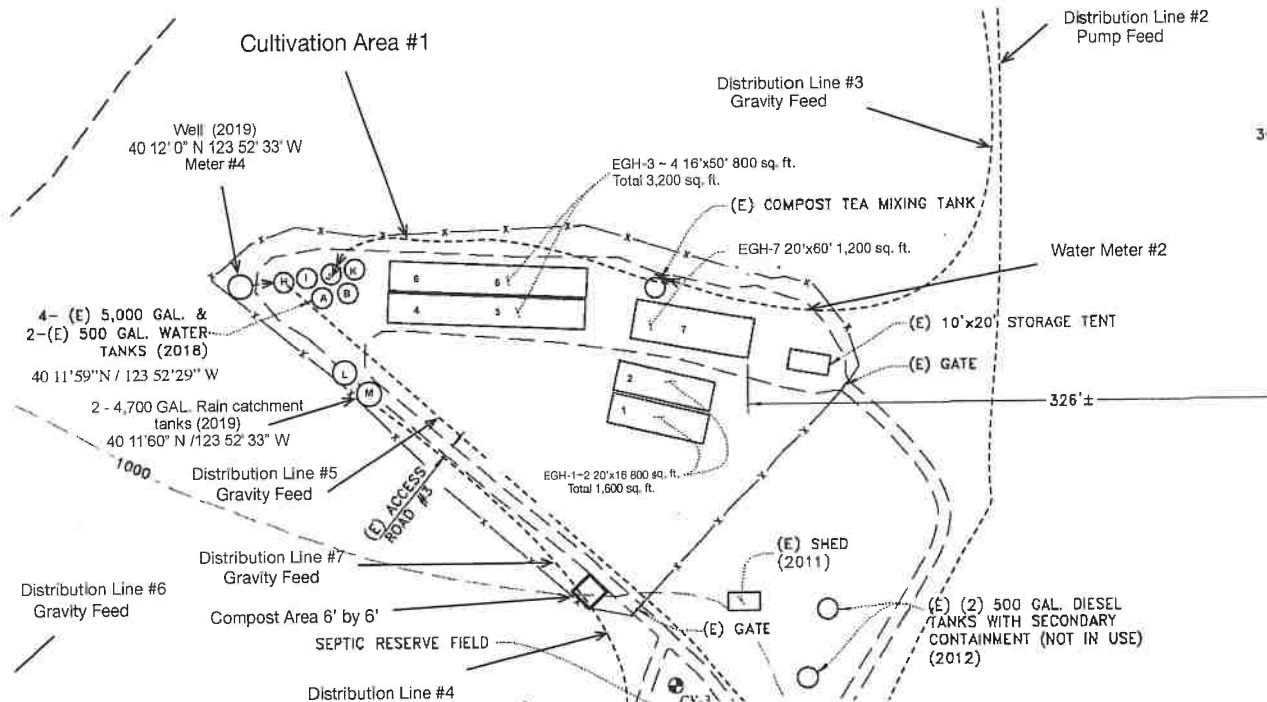
- a) Acceptable forms of identification include the following:
- b) A document issued by a federal, state, county, or municipal government, or a political subdivision or agency thereof, including, but not limited to, a valid motor vehicle operator's license, that contains the name, date of birth, physical description, and picture of the person; or
- c) A valid identification card issued to a member of the Armed Forces that includes a date of birth and a picture of the person; or
- d) A valid passport issued by the United States or by a foreign government.
- e) A valid proof of identification must clearly indicate the age or birthdate of the individual.

21. Site Map

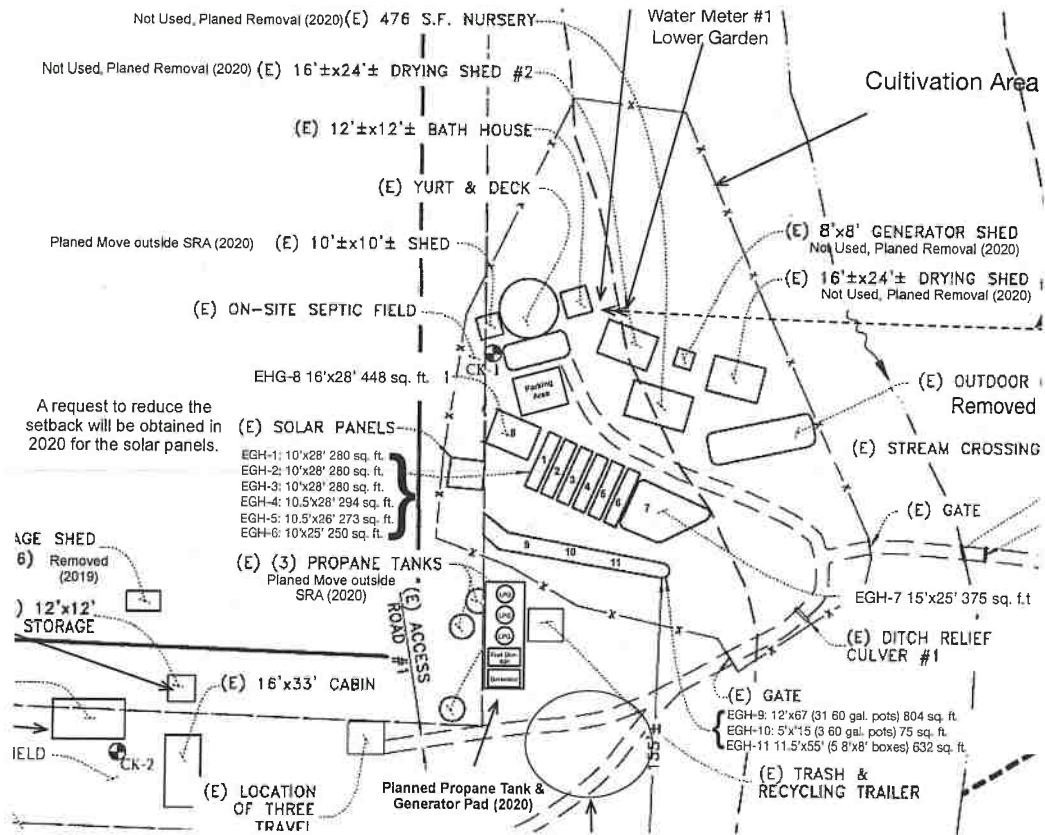


22. Cultivation Areas

Cultivation Area-1



Cultivation Area-2



23. Cultivation Area Details

23.1 Cultivation Area-1 Details

All access roads and paths are surfaced with 3/4 inch gravel and are pervious to rain. Please see attached pictures titled Access Road 3. All cultivation areas inside of Hooped Green houses have use weed barriers such as Jobes Easy Gardener Original in the inside pathways. The same type of weed barrier is used under potted plants.

Area	Path / Flooring Material	Description
EGH1	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EGH2	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EGH3	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EGH4	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EGH5	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EGH6	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EGH7	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
Access Road 2	Dirt and 3/4 inch gravel	All roads are either dirt or a mixture of dirt and 3/4 inch gravel.
Access Road 3	Dirt and 3/4 inch gravel	All roads are either dirt or a mixture of dirt and 3/4 inch gravel.

23.1 Cultivation Area-1 Pictures

Access Road 2 North Gate



Access Road 2 South Gate



Access Road 3 Facing EGH-3



EGH 1



EGH 2



EGH 3



EGH 5



EGH 4



23.2 Cultivation Area-2 Details

All access roads and paths are surfaced with 3/4 inch gravel and are pervious to rain. Please see attached pictures titled Access Road 1 & Access Road 2. All other cultivation areas inside of Hooped Green houses have use weed barriers such as Jobes Easy Gardener Original in the inside pathways.

Area	Path / Flooring Material	Description
EHH2	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH3	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH4	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH5	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH6	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH7	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH8	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH9	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH10	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
EHH11	Weed Barrier	Weed barrier material is used in the pathway in the middle of the Hooped Greenhouse. Weed barrier material is used under potted plants.
Access Road 1	Dirt and 3/4 inch gravel	All roads are either dirt or a mixture of dirt and 3/4 inch gravel.

23.3 Cultivation Area-2 Pictures

Access Road 1 (Front Gate)



EGH 2 ~ 7



EGH-1

Access Road 1



23.4 Domestic Housing

Domestic Housing

Two persons live onsite and are housed in area titled YURT & DECK. In addition, an on-site septic system and bath house are provided.



January 31, 2022

Humboldt County Planning & Building Department
3015 H St
Eureka, CA 95501

RE: Addendum to Operating Policy and Procedures - Lower Thomas Road LLC,
Planning Application #12214, APN 219-041-012

Prepared by Elevated Solutions, Inc.

Project Description

Lower Thomas Road LLC is seeking a Conditional Use Permit for 9,248 square feet of existing outdoor cultivation utilizing light deprivation techniques, as well as a Special Permit to allow the continued use of (2) 16'x24' (384 SF) pre-existing drying/curing buildings and segment of the road system located within the 100' setback of a Class II watercourse. The applicant proposes (1) 10'x25' (250 SF) greenhouse and (1) 10'x40' (400 SF) greenhouses to be used as an ancillary nursery. Cultivation is comprised of (1) 13'x64' (832 SF) greenhouse, (1) 6.5'x21' (136.5 SF) greenhouse, (1) 6.5'x29' (188.5 SF), (1) 10'x25' (250 SF) greenhouse, (4) 10'x28' (280 SF) greenhouses, (1) 10.5'x25' (273 SF) greenhouse, (1) 16'x28' (448 SF) greenhouse, (4) 16'x50' (800 SF) greenhouses, (1) 20'x60' (1200 SF) greenhouse, (2) 16'x50' (800 SF) greenhouses. Water for agricultural use is sourced from a permitted groundwater well and domestic use is sourced from a spring POD. Lower Thomas Road LLC has 43,300 gallons of water storage in the form of hard plastic tanks to be used during the forbearance period. Estimated annual water usage is 144,500 gallons. Power is sourced from a 5kW battery charged solar system and (1) backup 8.5kW Kohler propane generator. Fuel for farm equipment is stored in a 3'x4' contained storage area. There is also an existing 30'x32' (960 SF) shed utilized for pesticide and fertilizer storage. Drying and curing takes place in the (2) 16'x24' buildings. Applicant self-processes on-site utilizing a trim machine. All other cultivation activities are managed by (2) full time employees.