



**COUNTY OF HUMBOLDT**  
**PLANNING AND BUILDING DEPARTMENT**  
**CURRENT PLANNING DIVISION**

---

3015 H Street Eureka CA 95501  
Phone: (707)445-7541 Fax: (707) 268-3792

Hearing Date: May 4, 2017

To: Humboldt County Planning Commission

From: John H. Ford, Director of Planning and Building Department

Subject: **Northern Emeralds Special Permit**  
Application Number 10258  
Case Number SP 16-018  
Assessor's Parcel Number 513-151-032  
5460 Dows Prairie Rd., McKinleyville

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Please contact Joshua Dorris, Planner, at 268-3779, or by email at [jdorris@co.humboldt.ca.us](mailto:jdorris@co.humboldt.ca.us), if you have any questions about the scheduled public hearing item.

## AGENDA ITEM TRANSMITTAL

Hearing Date	Subject	Contact
May 4, 2017	Special Permit	Joshua Dorris

**Project Description:** A proposed Special Permit for an existing two-thousand five-hundred (2,500) square foot indoor cultivation area within an existing barn on the property. The proposed Special Permit would also allow an expansion of the cultivation area by an additional two-thousand five-hundred (2,500) square feet to a total of five-thousand (5,000) square feet. The proposed Special Permit is associated with another approved project on the same property – a Zoning Clearance Certificate (ZCC 16-007) for a new ten-thousand (10,000) square foot mixed-light cannabis cultivation area.

**Project Location:** The property is located in Humboldt County in the Dows Prairie area near McKinleyville approximately three-thousand three-hundred and seventeen (3,317) feet south of the intersection of Dows Prairie Road and Crannell Road on the property known as 5460 Dows Prairie Road.

**Present Plan Land Use Designation:** Coastal Zone - Agriculture Exclusive/Prime Lands (AEP), Inland - Agriculture Exclusive/Prime and Non-prime Lands (AE). Slope Stability: Low Instability (1) and Relatively Stable (0).

**Present Zoning:** Inland - Agriculture Exclusive (AE), Coastal Zone - Agriculture Exclusive-Minimum lot size 60.0 acres with a Noise Impact combining zone (AE-60/N).

**Case Number:** SP 16-018

**Application Number:** 10258

**Assessor's Parcel Number:** 513-151-032

**Applicant**

Northern Emeralds  
600 F St., Suite 3-154  
Arcata, CA 95521

**Owner**

Ray and Jennifer Christie  
295 Jackson Ranch Rd.  
Arcata, CA 95521

**Agent**

Cody Stross  
600 F St., Suite 3, #839  
Arcata, CA 95521

**Environmental Review:** No. CEQA Exemption Section: 15301-Existing Facilities

**Major Issue:** Letter from neighbor requesting a Public Hearing.

**State Appeal Status:** Project is NOT appealable to the California Coastal Commission.

**Northern Emeralds Special Permit**  
Case Number SP 16-018  
Assessor's Parcel Number (APN): 513-151-032-000

**Recommended Planning Commission Action**

1. Describe the application as a public hearing.
2. Request that staff present the project.
3. Open the public hearing and receive testimony; and,
4. Close the hearing and take the following action:

*Find the project exempt from environmental review pursuant to Section 15301 of the State CEQA Guidelines, make all of the required findings for approval of the Special Permit based on evidence in the staff report and any public testimony, and adopt the Resolution approving the proposed Northern Emeralds Special Permit, subject to the recommended conditions.*

**Executive Summary**

The proposed Special Permit would allow an existing two-thousand five-hundred (2,500) square foot indoor cultivation area within an existing barn on the property, and would also allow an expansion of the cultivation area by an additional two-thousand five-hundred (2,500) square feet to a total of five-thousand (5,000) square feet in compliance with the County Commercial Medical Marijuana Land Use Ordinance (CMMLUO) and the Medical Marijuana Safety and Regulation Act (MMRSA).

The proposed Special Permit is associated with another project on the same property – a Zoning Clearance Certificate (ZCC 16-007) for a new ten-thousand (10,000) square foot mixed light cannabis cultivation area. ZCC 16-007 was administratively approved July 18, 2016.

There is a single family dwelling along with other existing agricultural uses on the parcel in addition to the proposed cannabis cultivation. Drying, curing and processing of the cultivated plants would occur offsite at another facility. The parcel is served by onsite water and sewage disposal systems, and a paved County-maintained public road (Dows Prairie Road). The proposed site for cultivation is not within the coastal zone.

The materials submitted with the application include a Security and Safety Plan that states all buildings will have security apparatuses in place that require keys or codes for access. Keys and access codes will be distributed only to employees that have relevant tasks in those areas. No unsupervised public access would be permitted. The Security Plan also states that the operation would have cameras that would fully monitor and record the entire grounds and building interiors and exteriors. An alarm system would also be installed that notifies staff and emergency services. A fire safety system is also proposed which includes fire suppression, evacuation plans and first aid training for employees.

The project was originally noticed to the surrounding properties as an administrative approval on November 17, 2016. In response to this Notice of Intent to Approve, the Department received a request for a public hearing for the project (Attachment 5). This notification made this permit subject to a public hearing. The letter did not specify reasons for the request of public hearing.

The safety plan measures summarized in the project description above are set forth in Attachment 3 to the staff report and remain an on-going requirement of the permit.

The Building Inspection Division recommends a conditional approval.

Staff recommends a provisional Special Permit in order for the applicant to secure building permits for the existing barn.

Staff recommends that the Planning Commission conduct a public hearing and receive testimony on the project. If the Commission is able to make all the required findings based on the evidence in the record, staff recommends that the Planning Commission approve the application subject to the recommended conditions.

**Alternatives:** The Planning Commission could elect not to approve the project, or to require the applicant to submit further evidence, or modify the project. These alternatives could be implemented if the Commission is unable to make all of the required findings. Planning Division staff has stated that the required findings in support of the proposal have been made. Consequently, Planning staff does not recommend further consideration of either alternative.

**RESOLUTION OF THE PLANNING COMMISSION  
OF THE COUNTY OF HUMBOLDT  
Resolution Number 17-**

**Case Number SP 16-018  
Assessor's Parcel Number: 513-151-032**

**Makes the required findings for certifying compliance with the California Environmental Quality Act and conditionally approves the Northern Emeralds Special Permit request.**

**WHEREAS**, Northern Emeralds submitted an application and evidence in support of approving the Special Permit to permit an existing two-thousand five-hundred (2,500) square feet and for an expansion of an existing commercial cannabis establishment; and

**WHEREAS**, the County Planning Division has reviewed the submitted application and supporting substantial evidence and has referred the application and evidence to involved reviewing agencies for site inspections, comments and recommendations; and

**WHEREAS**, the project is exempt from environmental review per Section 15301 (Existing Facilities) of the CEQA Guidelines; and

**WHEREAS**, Attachment 2 in the Planning Division staff report includes substantial evidence in support of making all of the required findings for approving the proposed Special Permit (Case Number SP 16-018); and

**WHEREAS**, a public hearing was held on the matter before the Humboldt County Planning Commission on May 4, 2017.

**NOW, THEREFORE**, be it resolved, determined, and ordered by the Humboldt County Planning Commission that the following findings be and are hereby made:

1. The Planning Commission finds the proposed project is exempt from environmental review; and
2. The Planning Commission further makes the findings in Attachment 2 of the Planning Division staff report for Case Number SP 16-018 based on the submitted substantial evidence; and
3. The Planning Commission approves the Special Permit Case Number SP 16-018 as recommended and conditioned in Attachment 1.

Adopted after review and consideration of all the evidence on May 4, 2017.

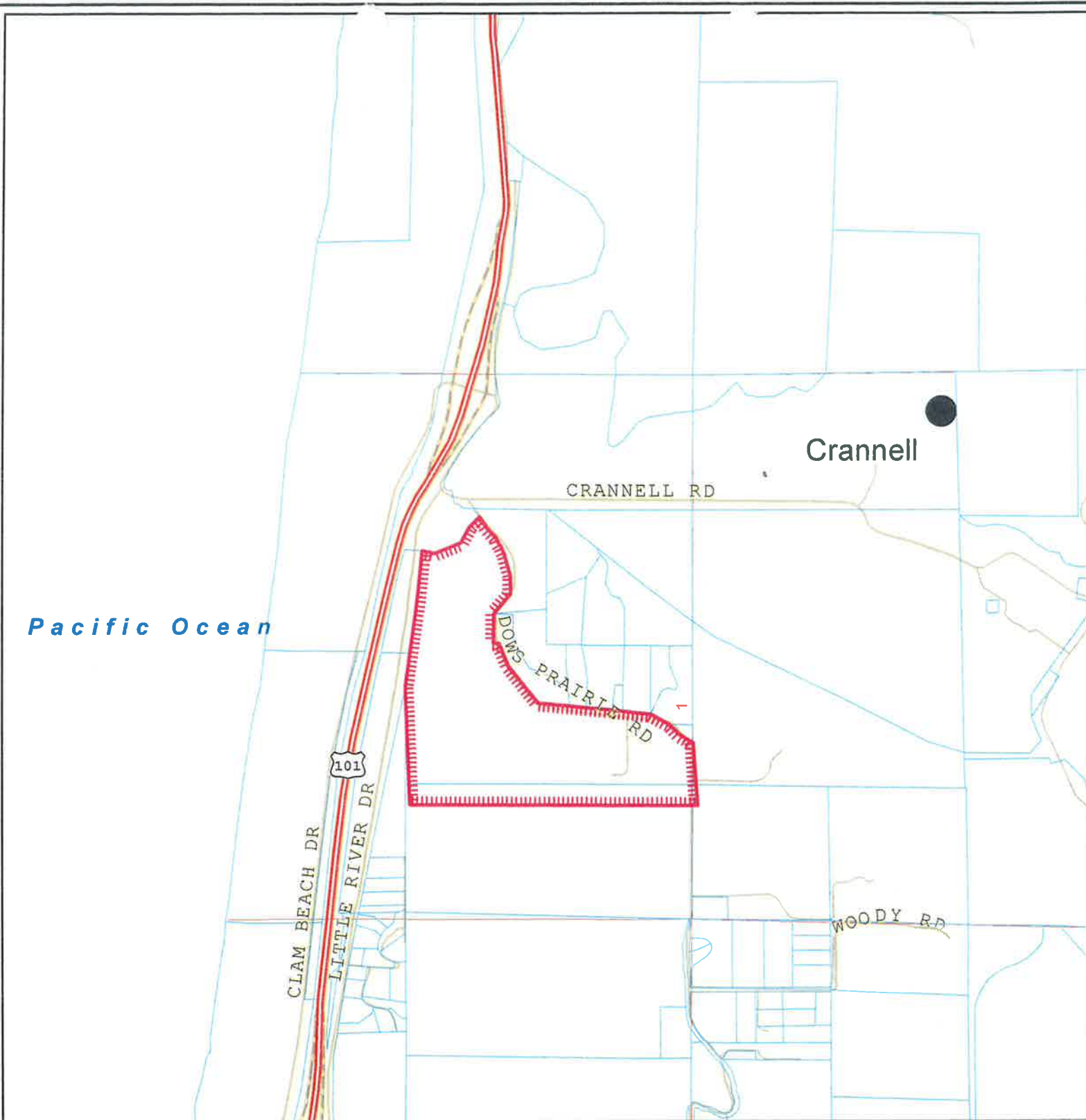
The motion was made by COMMISSIONER \_\_\_\_\_ and second by COMMISSIONER \_\_\_\_\_:

AYES: COMMISSIONERS:  
NOES: COMMISSIONERS:  
ABSENT: COMMISSIONERS:  
ABSTAIN: COMMISSIONERS:  
DECISION:

\_\_\_\_\_  
Robert Morris, Chair

I, Suzanne Lippre, Clerk to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above entitled matter by said Commission at a meeting held on the date noted above.

\_\_\_\_\_  
Suzanne Lippre, Clerk



**LOCATION MAP**  
**PROPOSED STROSS**  
**SPECIAL PERMIT AND ZONING CLEARANCE CERTIFICATE**  
**DOWS PRAIRIE AREA**  
**CASE NUMBERS SP 16-018, ZCC 16-007**  
**APN: 513-151-032**  
**T7N R1E S7 HB&M (Crannell)**

Project Area = 

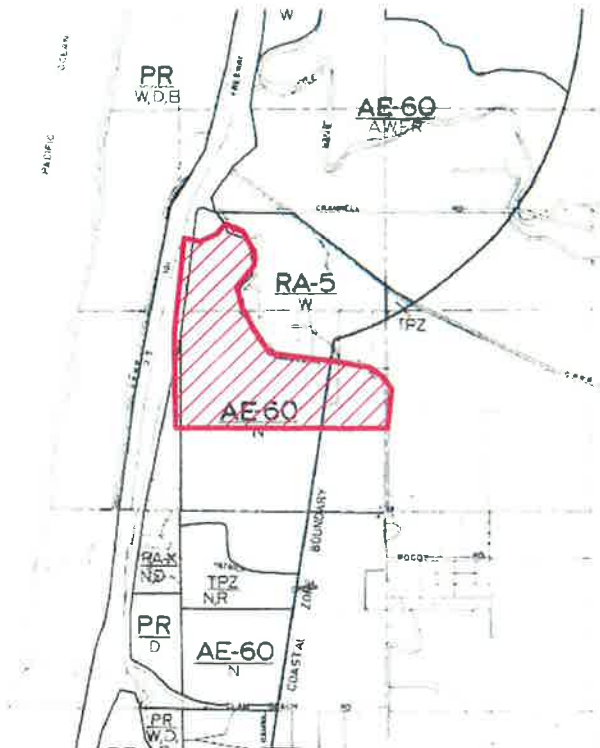
This map is intended for display purposes and should not be used for precise measurement or navigation. Data has been obtained from the Emeralds - Stross 10258 for accuracy.

May 4, 2017

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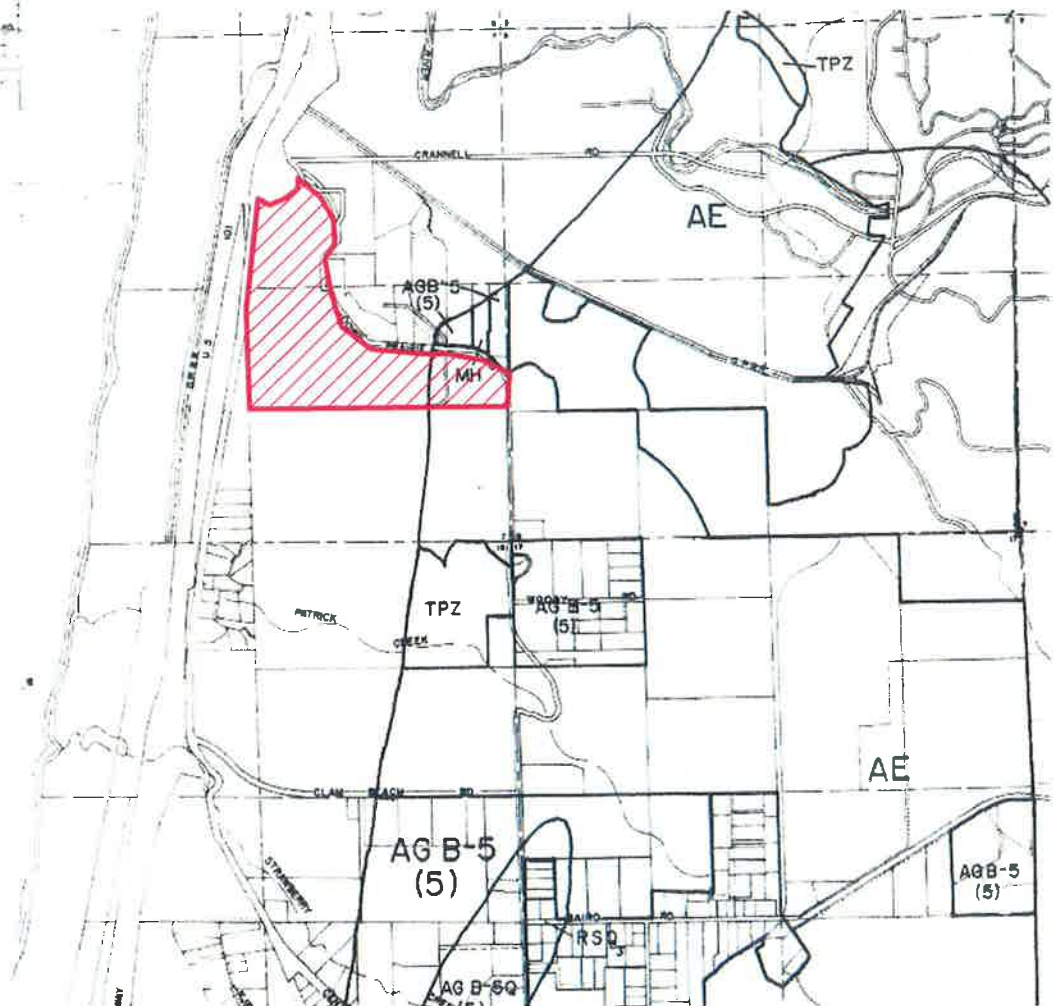
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**COASTAL ZONING  
MAP F11**

**INLAND ZONING MAP  
(MCKINLEYVILLE)**



**ZONING MAP**

**PROPOSED STROSS  
SPECIAL PERMIT AND ZONING CLEARANCE CERTIFICATE  
DOWS PRAIRIE AREA  
CASE NUMBERS SP 16-018, ZCC 16-007  
APN: 513-151-032  
T7N R1E S7 HB&M (Cranell)**

Project Area = 



PTN SEC 7 7N 1E

SEE 511 P 37 FOR DETAIL OF SHADED AREA.

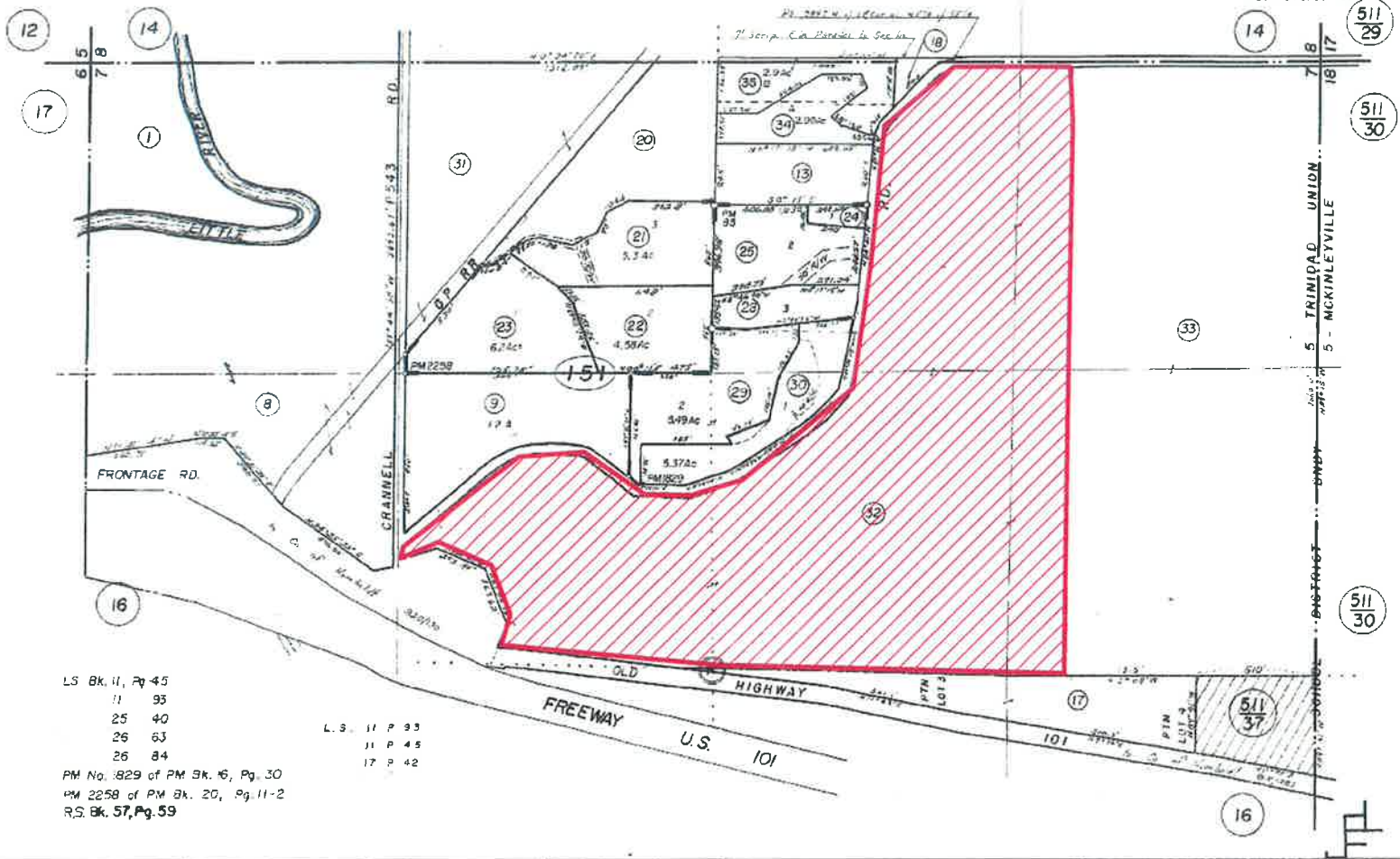
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T.C.A. 141-00

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REV 5/5/99 HLT

LS 26 P 63, 94



LS Bk. 11, Pg. 45  
11 93  
25 40  
26 63  
26 84  
PM No. 1829 of PM Bk. 16, Pg. 30  
PM 2258 of PM Bk. 20, Pg. 11-2  
RS Bk. 57, Pg. 59

L.S. 11 P 93  
11 P 45  
17 P 42

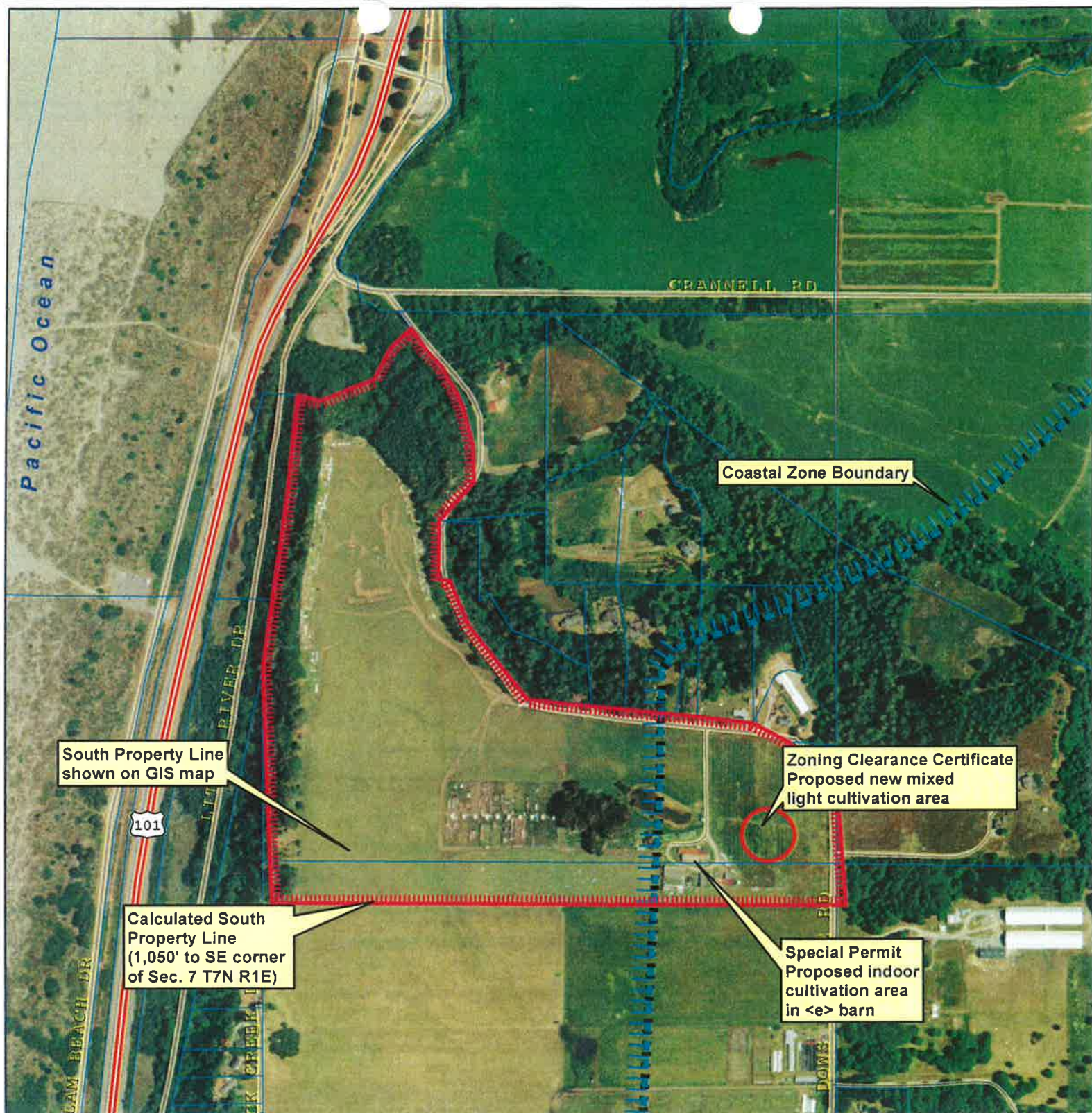
### ASSESSOR'S PARCEL MAP

**PROPOSED STROSS  
SPECIAL PERMIT AND ZONING CLEARANCE CERTIFICATE  
DOWS PRAIRIE AREA  
CASE NUMBERS SP 16-018, ZCC 16-007  
APN: 513-151-032  
T7N R1E S7 HB&M (Cranell)**

Project Area =

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has been provided for general information only. For accuracy, please refer to the original map or the Assessor's Parcel Map for the project area.





## AERIAL MAP

### PROPOSED STROSS SPECIAL PERMIT AND ZONING CLEARANCE CERTIFICATE DOWS PRAIRIE AREA CASE NUMBERS SP 16-018, ZCC 16-007 APN: 513-151-032 T7N R1E S7 HB&M (Cranell)

Project Area =

This map is intended for display purposes and should not be used for precise measurement or navigation. Data for this map was derived from the Northern Emeralds - Stross 10258 for accuracy.

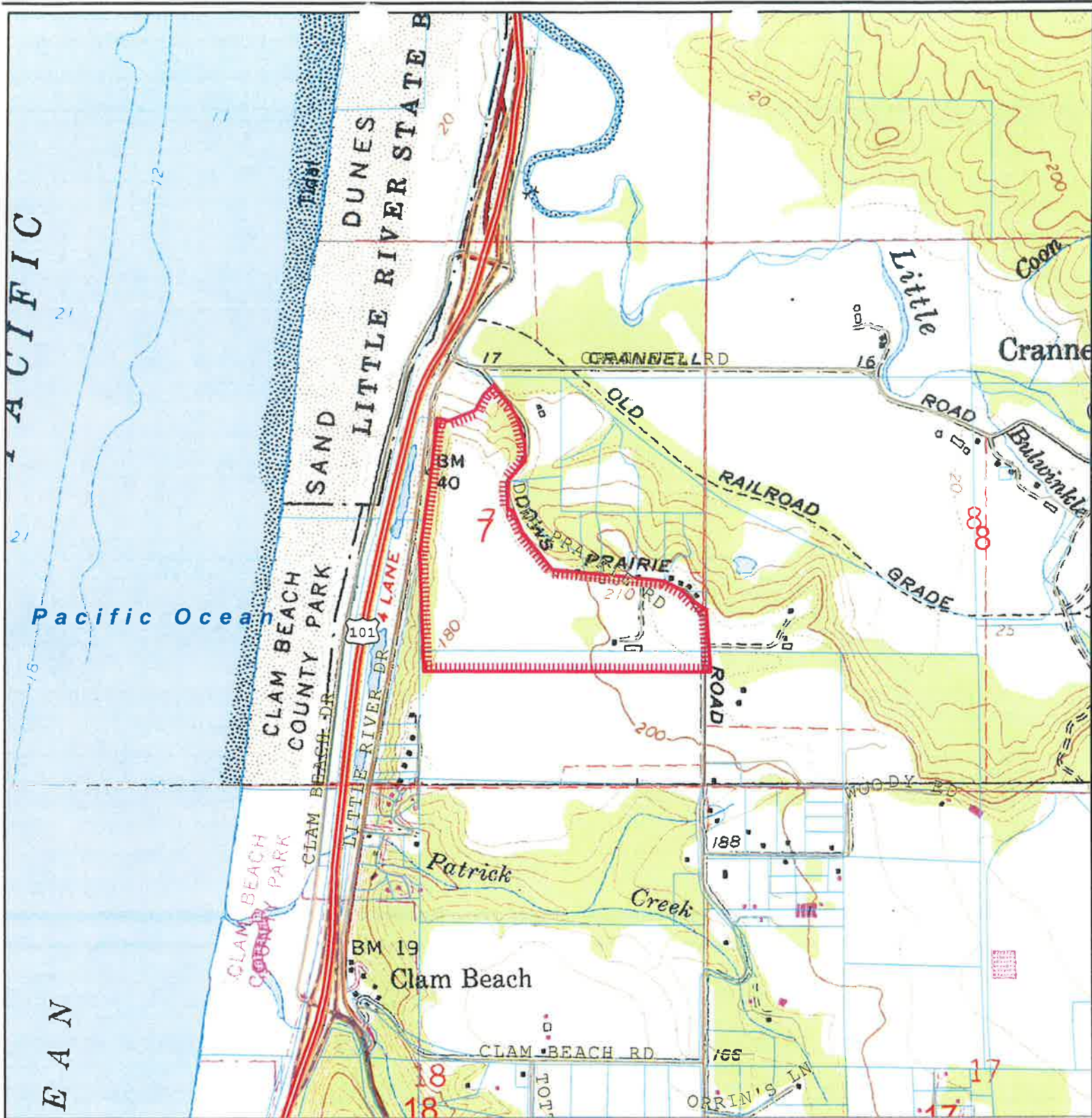
May 4, 2017

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# TOPO MAP

PROPOSED STROSS  
SPECIAL PERMIT AND ZONING CLEARANCE CERTIFICATE  
DOWS PRAIRIE AREA  
CASE NUMBERS SP 16-018, ZCC 16-007  
APN: 513-151-032  
T7N R1E S7 HB&M (Cranell)

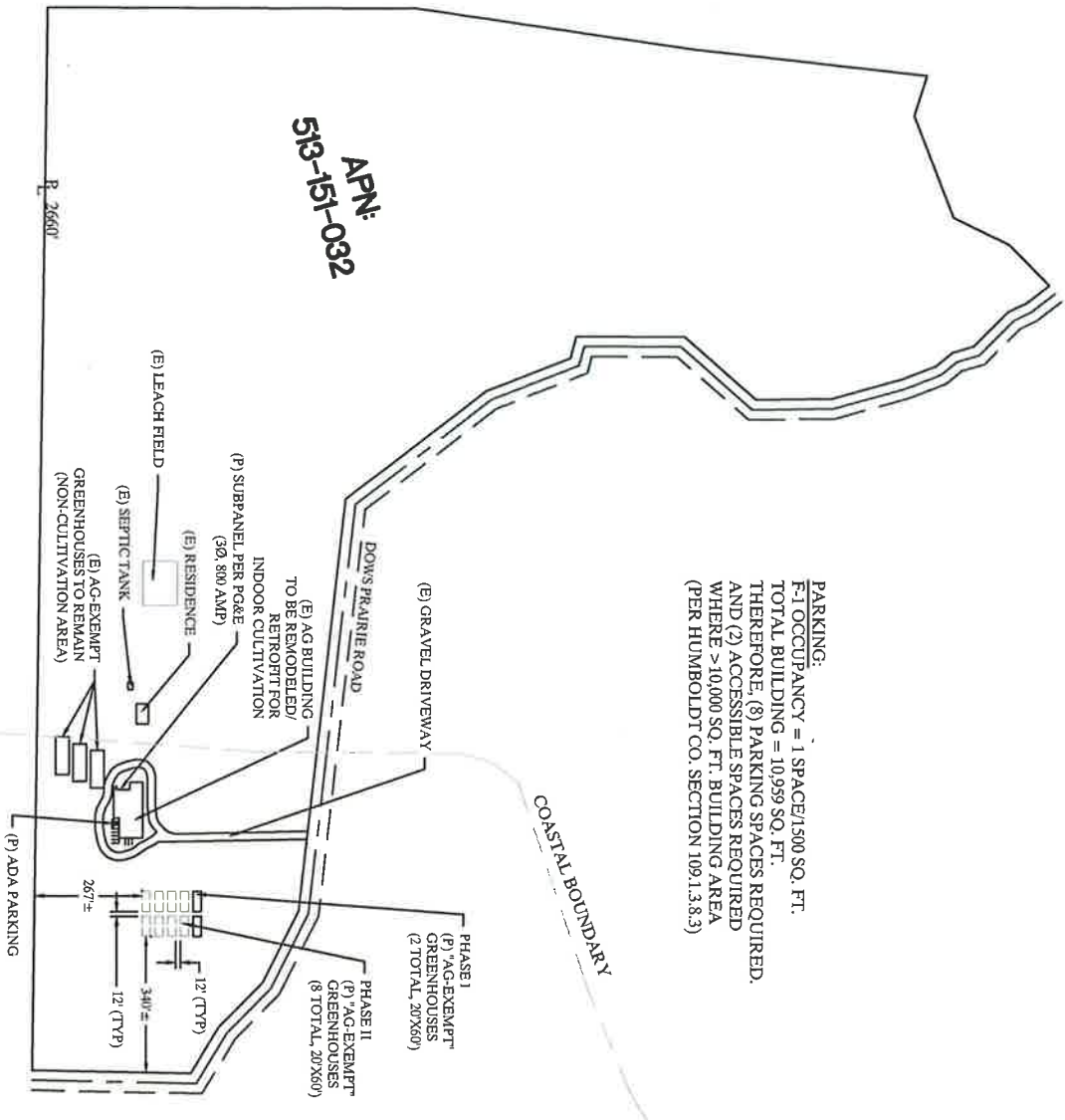
Project Area = 

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has been verified for accuracy.  
SP 16-018 Northern Emeralds - Stross 10258

May 4, 2017

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**PARKING:**  
 F-I OCCUPANCY = 1 SPACE/1500 SQ. FT.  
 TOTAL BUILDING = 10,959 SQ. FT.  
 THEREFORE, (8) PARKING SPACES REQUIRED,  
 AND (2) ACCESSIBLE SPACES REQUIRED  
 WHERE > 10,000 SQ. FT. BUILDING AREA  
 (PER HUMBOLDT CO. SECTION 109.1.3.8.3)



VICINITY MAP  
 N.T.S.

- NOTES:**
1. PROPERTY LINES AND BUILDING LOCATIONS ARE APPROXIMATE AND BASED ON AERIAL PHOTOS.
  2. NO CREEKS, WELL ON PROPERTY WITH 3000 GAL. WATER TANK.
  3. ZONING: AE-AE-60/N (S.R.A. & COASTAL ZONE)
  - 3.1. FRONT SETBACK = 20'
  - 3.2. REAR SETBACK = 30'
  - 3.3. INTERIOR SIDE SETBACK = 30'
  - 3.4. EXTERIOR SIDE SETBACK = 20'
  4. SITE AREA = 74,0815 ACRES
  5. BUILDING AREA:
    - 5.1. (P) 20'X60' GREENHOUSE = 1,200 SQ. FT.
    - 5.2. (2) GREENHOUSES TOTAL = 2,400 SQ. FT.

**PROJECT DESCRIPTION:**  
 "ZONING CLEARANCE CERTIFICATE" PERMITTING OF PROPOSED MIXED-LIGHT CULTIVATION, 10,000 S.F. MAX



**AGENT:**  
 ATLAS ENGINEERING  
 252 G STREET  
 ARCATTA, CA 95521  
 (707) 822-2822

**PROPERTY OWNER:**  
 RAY CHRISTIE  
 5466 DOWS PRAIRIE  
 MCKINLEYVILLE, CA 95519

**CLIENT:**  
 NORTHERN EMERALDS  
 600 F STREET, STE. 3 #514  
 ARCATTA, CA 95521  
 (707) 502-0234

<b>PLOT PLAN</b> <b>CHRISTIE #1 BARN</b> 5466 DOWS PRAIRIE RD. MCKINLEYVILLE, CA 95519 May 4, 2017 APN 513-151-032		 <b>ATLAS</b> ENGINEERING <small>AMERICAN COUNCIL ON ENGINEERING</small>
<b>Revision No.:</b> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<b>Date:</b> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<b>Scale:</b> As Noted <b>Drawn By:</b> JOH <b>Project #:</b> 16036 <b>Date:</b> 4/19/2017 <b>Sheet No.:</b> P1

SP 16-018 Northern Emeralds - Stross 10258



**ATTACHMENT 1**  
**Recommended Conditions of Approval**

**APPROVAL OF THE SPECIAL PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS WHICH MUST BE SATISFIED BEFORE RELEASE OF THE BUILDING PERMIT AND INITIATION OF OPERATIONS.**

1. Pursuant to the MMRSA, Health and Safety Code section 19322(a)(9), an applicant seeking a cultivation license shall "provide a statement declaring the applicant is an 'agricultural employer,' as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law."

**Development Restrictions**

1. The applicant shall execute a Compliance Agreement with the Humboldt County Planning Department detailing all necessary permits and infrastructure improvements described under Conditions of Approval #2 –5. The agreement shall provide a timeline for completing all outstanding items. All activities detailed under the agreement must be completed to the satisfaction of the Planning and Building Department before the permit may be finalized and no longer considered provisional.
2. The applicant shall secure permits for all unpermitted structures related to the cannabis cultivation and other commercial cannabis activity. The plans submitted for building permit approval shall be consistent with the project description and approved project site plan. A letter or similar communication from the Building Division verifying that all structures related to the cannabis cultivation are permitted will satisfy this condition.
3. The approved building plans shall address odor management by incorporating a ventilation/air filtration system which limits potential adverse odor emission impacts to employees and/or properties located in the vicinity. The system shall be designed, signed, and stamped by a mechanical engineer for review and approval by the Building Official.
4. The approved building plans shall meet all applicable fire codes, including fire suppression infrastructure requirements deemed necessary for the project by the Building Inspection Division. Sign off on the Occupancy Permit by the Building Division shall satisfy this requirement.
5. The applicant shall improve the driveway's entrances along Dows Prairie Road to the satisfaction of the Department of Public Works (DPW). A letter or similar communication from DPW verifying that all their requirements have been met will satisfy this condition.
6. Where feasible, new utilities shall be underground or sited unobtrusively if above ground.
7. If operation of the business requires use of a volatile liquid the applicant shall identify the liquid, the amounts to be stored on site, and provide a Material Safety Data Sheet Report with the building permit application for review and approval by the Building Official.
8. Construction hours shall be limited to between the hours of 8:00 a.m. and 7:00 p.m. Monday through Friday, and between 9:00 and 7:00 p.m. on Saturdays. No heavy equipment related construction activities shall be allowed on Sundays or nationally recognized holidays.

9. The applicant shall execute an Affidavit for Non-diversion of Medical Cannabis on a form provided by the Planning Division.
10. This project is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. Any and all outstanding Planning fees to cover the processing of the subdivision shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka. The Department will provide a bill to the applicant upon file close out.

**Ongoing Requirements/Development Restrictions Which Must be Satisfied for the Life of the Project:**

1. The project shall be developed, operated and maintained in accordance with the project description, the Cultivation and Operations Plan, and the approved project site plan, and floor plan. Hours of operation are limited to 8 am - 5 pm. Access to the rooms where commercial cannabis is present shall be restricted so that no one under the age of 18 is allowed entry. Changes to the project except for Minor Deviations to the Plot Plan as provided in Section 312- 11.1, shall require Modification of this permit.
2. All new and existing outdoor lighting shall be compatible with the existing setting and directed within the property boundaries.
3. Commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the Humboldt County Commercial Medical Marijuana Land Use Ordinance (CMMLUO) and the Medical Cannabis Regulation and Safety Act (MCRSA), as may be amended from time to time, as applicable to the permit type.
4. Possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with the MCRSA, and regulations promulgated thereunder, as soon as such licenses become available.
5. The operation shall participate in the Medical Cannabis Track and Trace Program administered by the Humboldt County Agricultural Commissioner, when available.
6. Odors shall be contained on the property on which the Cannabis activity is located. To implement this requirement air filtration and ventilation equipment is to be maintained in good working condition and monitored on an on-going basis to limit potential adverse odor emission impacts to employees and/or properties located in the vicinity. If the County receives any odor complaints, the permit holder shall work with the Building Official to correct odor concerns.
7. **Permit Duration.** The Permit shall be valid for one year from the effective date of approval, and on the anniversary date of such effective each year thereafter, unless an annual compliance inspection has been completed and the permit has been found to comply with all conditions of approval. In the event the inspection finds noncompliance, a written notification of shall be provided to the permit holder identifying the items not in compliance and the action the permit holder may take to cure the noncompliance. Failure to cure the noncompliance shall result in termination of the permit. The process of notification, re-inspection and appeal of any noncompliance determination shall be as set forth in sections 55.4.1.2.2 and 55.4.13 of the CMMLUO.

8. **Permit renewals to comply with updated laws and regulations.** Permit renewal per COA #7 above is subject to the laws and regulations effective at the time of renewal, which may be substantially different than the regulations currently in place and may require the submittal of additional information to ensure that new standards are met.
9. **Transfers.** Transfer of any leases or permits approved by this project is subject to the review and approval of the Planning Director for conformance with CMMLUO eligibility requirements, and agreement to permit terms and acknowledgments. The fee for required conformance with conditions review shall accompany the request. The request shall include the following information:
  - (1) Identifying information for the new Owner(s) and management as required in an initial permit application;
  - (2) A written acknowledgment by the new Owner in accordance as required for the initial Permit application;
  - (3) The specific date on which the transfer is to occur; and
  - (4) Acknowledgement of full responsibility for complying with the existing Permit; and
  - (5) Execution of an Affidavit of Non-diversion of Medical Cannabis.
10. **Modifications to the Facility.** Aside from the improvements described in the project description, prior to making any modifications to a permitted facility, the permittee shall submit to the Planning Director a request for determination of County approvals, together with the appropriate fee. The request shall contain a description sufficiently detailed to allow the Planning Director to determine what permits and other approvals, are needed, and whether a modified Permit is required.
11. **Inspections.** The permit holder and subject property owner are to permit the County or representative(s) or designee(s) to make inspections at any reasonable time deemed necessary to assure that the activities being performed under the authority of this permit are in accordance with the terms and conditions prescribed herein.
12. All signage shall comply with Section 314-87.2 of the Humboldt County Code.
13. The cultivation operations shall use the following best management practices to ensure the safety of employees and the cultivation product:
  - A. Ensure that the space in which any Medical Marijuana product is to be cultivated is a fully enclosed room and clearly designated on the approved floor plan.
  - B. Ensure that all applicable sanitary rules are followed.
  - C. Ensure that the standard operating procedure includes, but need not be limited to, step-by-step instructions on how to safely and appropriately:
    - a. Conduct all necessary safety checks prior to commencing handling;
    - b. Clean all equipment, counters and surfaces thoroughly; and
    - c. Dispose of any waste produced during the cultivation of Medical Marijuana in accordance with all applicable local, state and federal laws, rules and regulations.
  - D. Establish written and documentable quality control procedures designed to maximize



safety for employees and minimize potential product contamination.

- E. Have a comprehensive training manual that provides step-by-step instructions for cultivation of medical marijuana on its Licensed Premises. The training manual shall include, but need not be limited to, the following topics:
- a. All standard operating procedures used at that Licensed Premises;
  - b. The quality control procedures;
  - c. The emergency procedures for the Licensed Premises including:
    - Emergency procedures to be followed by employees in case of a fire, chemical spill or other emergency
    - Accident reporting and investigation policies;
    - Fire prevention
    - Materials handling policies;
    - Job hazard analyses; and
    - Personal protective equipment policies, including respiratory protection.
  - d. The appropriate use of any necessary safety or sanitary equipment;
  - e. The hazards presented by all chemicals and solvents used within the Licensed Premises as described in the material safety data sheet for each chemical and solvent;
  - f. Clear instructions on the safe use of all equipment involved in each process and in accordance with manufacturer's instructions, where applicable; and
  - g. Any additional periodic cleaning required to comply with all applicable sanitary rules.
- F. Provide adequate training to every employee prior that to that individual undertaking any step in cultivation of a Medical Marijuana product.
- a. Adequate training shall include, but need not be limited to, providing a copy of the training manual for that Licensed Premises and live, in-person instruction detailing at least all of the topics required to be included in the training manual.
  - b. The individual training each employee shall sign and date a document attesting that all required aspects of training were conducted and that he or she is confident that the trainee can safely handle and distribute a Medical Marijuana product.
  - c. The employee that received the training shall sign and date a document attesting that he or she can safely implement all standard operating procedures, quality control procedures, and emergency procedures, operate all equipment, use all safety, sanitary and other equipment and understands all hazards presented by the chemicals and solvents to be used within the Licensed Premises and any additional period cleaning required to maintain compliance with all applicable sanitary rules.
- G. Maintain clear and comprehensive records of the name and signature of every individual who engaged in any step related to the cultivation of any Medical Marijuana product and the step that individual performed.
- H. Visibly post and maintain an emergency contact list which includes at a minimum:
- 1) Operation manager contacts;
  - 2) Emergency responder contacts;
  - 3) Poison control contacts.

- I. At all times, employees shall have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Plumbing facilities and water source must be capable of handling increased usage without adverse consequences to neighboring properties or the environment.
14. Persons engaging in the cultivation of any Medical Marijuana product shall:
  - A. Be over 18 years of age.
  - B. Not have been convicted of a felony for the illegal possession for sale, sale, manufacture, transportation, or cultivation of a controlled substance; a violent crime, as specified in subdivision (c) of Section 667.5 of the Penal Code; a serious crime, as specified in subdivision (c) of Section 1192.7 of the Penal Code; or a crime involving fraud, deceit, or embezzlement
  - C. Ensure that all equipment, counters and surfaces used in the cultivation of any Medical Marijuana product is food-grade including ensuring that all counters and surface areas were constructed in such a manner that it reduces the potential for the development of microbials, molds and fungi and can be easily cleaned.
  - D. Ensure that all equipment, counters, and surfaces used in the cultivation of any Medical Marijuana product are thoroughly cleaned after the completion of each Production Batch.
  - E. Ensure that the appropriate safety or sanitary equipment, including personal protective equipment, is provided to, and appropriately used by, each person engaged in the cultivation of any Medical Marijuana product.
15. Electrical power for indoor cultivation operations including but not limited to illumination, heating, cooling, and ventilation, shall be provided by on-grid power with 100% renewable source, on-site zero net energy renewable source, or with purchase of carbon offsets of any portion of power not from renewable sources. Permittee shall maintain records sufficient to demonstrate compliance with this standard.
16. Pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).

**Informational Notes:**

1. If cultural resources are encountered during construction activities, the contractor on site shall cease all work in the immediate area and within a 50 foot buffer of the discovery location. A qualified archaeologist as well as the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the applicant and lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided.

The Native American Heritage Commission (NAHC) can provide information regarding the appropriate Tribal point(s) of contact for a specific area; the NAHC can be reached at 916-653-4082. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the NAHC will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to PRC 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

**The applicant is ultimately responsible for ensuring compliance with this condition.**

2. The applicant is responsible for receiving all necessary permits and/or approvals from other state and local agencies.
3. This permit approval shall expire and become null and void at the expiration of one (1) year after all appeal periods have lapsed (see "Effective Date"); except where construction under a valid building permit or use in reliance on the permit has commenced prior to such anniversary date. Once initiated, the use is subject to the Permit Duration and Renewal provisions set forth in Condition of Approval # 7 and 8 of the On-Going Requirements /Development Restrictions, above. The period within which construction or use must be initially commenced may be extended as provided by Section 312-11.3 of the Humboldt County Code.

## ATTACHMENT 2

### Staff Analysis of the Evidence Supporting the Required Findings

**Required Findings:** To approve this project, the Hearing Officer must determine that the applicant has submitted evidence in support of making **all** of the following required findings.

The County Zoning Ordinance, Section 312-17.1 of the Humboldt County Code (Required Findings for All Discretionary Permits) specifies the findings that are required to grant a Special Permit:

1. The proposed development is in conformance with the County General Plan;
2. The proposed development is consistent with the purposes of the existing zone in which the site is located;
3. The proposed development conforms with all applicable standards and requirements of these regulations;
4. The proposed development and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare; or materially injurious to property or improvements in the vicinity;
5. The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law (the mid-point of the density range specified in the plan designation).
6. In addition, the California Environmental Quality Act (CEQA) states that one of the following findings must be made prior to approval of any development which is subject to the regulations of CEQA. The project either:
  - a) is categorically or statutorily exempt; or
  - b) has no substantial evidence that the project will have a significant effect on the environment and a negative declaration has been prepared; or
  - c) has had an environmental impact report (EIR) prepared and all significant environmental effects have been eliminated or substantially lessened, or the required findings in Section 15091 of the CEQA Guidelines have been made.

**1. General Plan Consistency.** The following table identifies the evidence which supports finding that the proposed tree removal is in conformance with all applicable policies and standards in the Framework Plan (FRWK) and the McKinleyville Community Plan (MCCP)<sup>1</sup>.

<b>Relevant Plan Section(s)</b>	<b>Summary of Applicable Goal, Policy or Standard</b>	<b>Evidence Which Supports Making the General Plan Conformance Finding</b>
Land Use: Agriculture Exclusive, §2722 (MCCP)	Agricultural and agriculturally related uses are allowed.  Density Range: One (1) dwelling unit per 160 acres to one (1) dwelling unit/ per 20 acres.	The MMRSA, Health and Safety Code section 11362.777(a) provides that medical cannabis is an agricultural product, subject to extensive state and local regulation. The CMMLUO provides for the cultivation and processing of medical cannabis within the zoning districts where agriculture is a principally permitted use, with limits and in compliance with performance standards that will preserve space for more traditional agricultural activities that supply food and fiber contributing to a diverse economic base. Indoor cultivation is permitted only in heavy commercial and industrial zones and only in existing structures in agricultural zones so as to prevent conversion of agricultural land to commercial or industrial development of structures typically utilized for indoor cultivation. The proposed indoor cultivation occurs within an existing agricultural structure (barn).
Urban Limits: §2600 (FP)	New development shall be located within existing developed areas or in areas with adequate public services.	The project site is outside the urban area.
Housing §2400 (FRWK)	Housing shall be developed in conformity with the goals and policies of the Humboldt County Housing Element.	The project does not involve residential development.

<sup>1</sup> As shown on the attached aerial photo map, a portion of the property is within the coastal zone, and is subject to the McKinleyville Area Plan. Since none of the proposed project or project components are within the coastal portion of the property, no further analysis of the coastal plan is provided in this staff report.

Relevant Plan Section(s)	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
Hazards §3200 (FRWK)	New development shall minimize risk to life and property in areas of high geologic, flood and fire hazards.	According to the Flood Insurance Rate Map (FIRM) Panel No. 450, the project site is located in Flood Zone C, which is defined as "areas of minimal flooding". The project site is outside of the 100 year flood boundary as it is considerably elevated above Little River. Geologic hazard maps of the Framework Plan show the slope instability of the property to be low, so the proposed development is not likely to subject to geologic hazards. The parcel is in an area of Moderate Fire Hazard rating. All applicable referral agencies that have provided comments have recommended approval of the project and have not identified any issues relating to hazards.
Biological Resources §3420 (FRWK)	Protect designated sensitive and critical resource habitats.	The Biological Resource maps of the Framework Plan do not identify any sensitive or critical habitat areas on the project site.
Cultural Resource Protection §3500 (FRWK)	New development shall protect cultural, archeological and paleontological resources.	The subject parcel was reviewed with respect to archaeological and cultural resources at the time of subdivision. The Northwest Information Center was referred, and requested an archaeological study be completed. An archaeological study was completed that found no archaeological resources on the project site. That study was referred to the Blue Lake Rancheria THPO. They requested the inadvertent discovery protocol be added to conditions of approval. A condition of approval regarding legal protection requirements has been added to the conditions of approval to this permit.



**2. The proposed development is consistent with the purposes of the existing zone in which the site is located; and 3. The proposed development conforms with all applicable standards and requirements of these regulations.** The following table identifies the evidence which supports finding that the proposed development is in conformance with all applicable policies and standards in the Humboldt County Zoning Regulations.

Zoning Section	Summary of Applicable Requirement	Evidence
<p>§314-7.1 AE - Agriculture Exclusive §314-55.4.8.3 Approvals for Indoor Cultivation</p>	<p>Agricultural uses are principally permitted. Indoor commercial cannabis cultivation of up to 5,000 square feet of canopy is allowed with a Special Permit on legally created parcels in the AE zone district within existing non-residential structures.</p> <p>Electrical power for indoor cultivation operations including but not limited to illumination, heating, cooling, and ventilation, shall be provided by on-grid power with 100% renewable source, on-site zero net energy renewable source, or with purchase of carbon offsets of any portion of power not from renewable sources.</p>	<p>The proposed project is a Special Permit for permitting the existing 2,500 square foot indoor cultivation area, and permitting an expansion of the canopy in the same structure by 2,500 square feet to a total of 5,000 square feet, the maximum allowed. The proposed use is an agricultural use that is specifically allowed with a Special Permit in this zone district under Section 314-55 of the Humboldt County Code. The parcel was legally created through an approved Lot Line Adjustment (Record of Survey, Book 50, Pages 66 &amp; 67 recorded November 29, 1989), and the activity is consistent with the terms of said Record of Survey. A zoning violation currently exists on the property. The complaint states that there is intensive agriculture occurring (extensive chicken coops) in violation of Humboldt County Code. However based on a site inspection by staff, there is no nexus between the proposed project and the violation as the coops are located away from the cultivation area and access to the coops is via a different driveway.</p> <p>The cultivation and operations plan in the project file documents the project is exclusively using power from PG&amp;E's Solar and Renewable Energy program, which is 100% provided from renewable energy sources.</p>

<b>Zoning Section</b>	<b>Summary of Applicable Requirement</b>	<b>Evidence</b>
<b>Development Standards</b>		
Min. Lot Area:	20 acres	The subject parcel is approximately 70 acres.
Max. Lot Coverage:	35%	Less than 5%
Min. Yard Setbacks (through the SRA requirements):	The parcel is within the mapped State Responsibility Area and 30 foot setbacks to all property lines are required.	The proposed facility occurs within an existing structure that is 30 feet or more from the nearest property lines.
Max. Building Height:	50 feet	100 feet

<b>314-55.4 Indoor Commercial Cultivation of Cannabis for Medical Use Inland Land Use Regulation (CMMLUO)</b>		
<b>Zoning Section</b>	<b>Summary of Applicable Requirement</b>	<b>Evidence that Supports the Required Finding</b>
§314-55.4.8.3 Indoor Cultivation	Indoor cultivation of commercial cannabis for medical use, up to 5,000 square feet of canopy, located in an existing non-residential structure, shall be permitted with a Special Permit in zone districts AG, AE, RA, (on parcels 5 acres or larger), C-2, C-3, MB, ML, U (where developed as an industrial use) and MH, subject to the conditions and limitations set forth in this Section.	The proposed project will permit the existing 2,500 square foot indoor cultivation operation in a barn on the property, and allow a 2,500 square foot expansion of that use in that same structure to a total five-thousand (5,000) square feet.  The subject property is correctly zoned, AE - Agricultural Exclusive, and the applicant will comply with all conditions of the MMLUO ordinance, as specified in the recommended conditions of approval.
§314-55.4.8.10 Permit Limit	No more than four commercial cannabis activity permits may be issued to a single person.	According to records maintained by the Department, the applicant has applied for a total of four cannabis activity permits, the maximum to which he is entitled.
§314-55.4.10 Application Requirements	Identifies the Information Required for All Applications	The project file contains all the information required by the ordinance.

**314-55.4 Indoor Commercial Cultivation of Cannabis for Medical Use Inland Land Use Regulation (CMMLUO)**

§314-55.4.11 Performance Standards	Identifies the Performance Standards for Cannabis Cultivation Activities	All the applicable performance standards are included as conditions of project approval. They are required to be met throughout the timeframe of the permit. Carbon offsets are provided through the PG&E Solar Choice Program.
§314-55.4.17 Sunset Date	No application for any Use Permit pursuant to the CMMLUO shall be processed for issuance or approval that is received after December 31, 2016.	The applicant submitted the Special Permit Application in May, 2016.

**4. Public Health, Safety, and Welfare and 6. Environmental Impact:** The following table identifies the evidence which supports finding that the proposed development will not be detrimental to the public health, safety and welfare, and will not adversely impact the environment.

<b>Code Section</b>	<b>Summary of Applicable Requirement</b>	<b>Evidence that Supports the Required Finding</b>
§312-17.1.4 Special Permit Findings	The proposed development will not be detrimental to the public health, safety and welfare, and will not be materially injurious to properties or improvements in the vicinity.	All responding referral agencies have either provided no comment or recommended approval of the proposed use. The proposed agricultural use is consistent with the type of development in the area. There is no evidence that the project will be materially injurious to properties or improvements in the vicinity.
§15301 of CEQA Guidelines	Categorically exempt from State environmental review.	The project has been determined to be exempt from CEQA pursuant to Sections 15301 – Existing Facilities of the Guidelines for the Implementation of CEQA. Section 15301 exempts from environmental review the operation, repair maintenance, permitting, licensing, or minor alteration of existing private structures or facilities where involving negligible or no expansion of use. The proposed development will occupy one existing structure of approximately 7,000 sq. ft. No use of hazardous materials are proposed aside from the cleaning agents, fertilizer, pesticide and fungicide described on the MSDS Data Sheets in the project file. The project site is in an agricultural area. The proposed project will not result in any significant adverse impact on the environment as the lot is 70 acres in size and ground coverage will be less than 5% of the lot area.

**5. Residential Density Target:** The following table identifies the evidence which supports finding that the proposed project will not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law.

<b>Code Section</b>	<b>Summary of Applicable Requirement</b>	<b>Evidence that Supports the Required Finding</b>
312-17.1.5 Housing Element Densities	The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law (the midpoint of the density range specified in the plan designation), except where: 1) the reduction is consistent with the adopted general plan including the housing element; and 2) the remaining sites identified in the housing element are adequate to accommodate the County share of the regional housing need; and 3) the property contains insurmountable physical or environmental limitations and clustering of residential units on the developable portions of the site has been maximized.	The proposed project involves an indoor cultivation operation on lands designated and zoned "AE - Agricultural Exclusive". The parcel was not inventoried as source of potential residential housing. Therefore, the project will not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law.

**ATTACHMENT 3**  
**Applicant's Evidence in Support of the Required Findings**

## **Northern Emeralds Cultivation and Operations Plan**

Site address:  
5466 Dows Prairie Rd.  
McKinleyville, CA 95519  
(Indoor)

### **Introductory Statement:**

Northern Emeralds is thrilled to have the opportunity to apply for commercial cannabis cultivation in Humboldt County. We are committed to working with the county to produce premium quality cannabis according to all requirements and regulations, with safety and environmental health as our highest priorities. We want to represent the best of Humboldt in all our practices, and produce a product that will make this community proud. Thank you for considering our application.

### **Description of water source, storage, irrigation plan, and projected water usage:**

Our water source is a well (see Site Plan for details).

We utilize a conscientious water usage plan designed to conserve and reuse as much water as possible. During each watering cycle, we deliver approximately 500 ml for a small plant, and approximately 1.5 liters for a big plant. Watering can occur once every 3-4 days, once every 2-3 days, or daily, depending on plant size and need. Our grow environment allows us to use dehumidifiers to recover a significant portion of our irrigation water by pulling it out of the air and recycling it into our irrigation system. Using this method, we recapture 30-80% of our irrigation water. Whenever possible, we also cycle runoff back into the watering reservoir. In the future, we plan to supplement our irrigation with a rain catchment system, with the goal of eventually using 100% renewable water for all cultivation activities. See pages 11-12 of the Operations Manual for additional details.

Water usage is not expected to exceed 500 gallons per week. Usage will go up as room size increases, but will reduce with implementation of rain catchment.

### **Description of site drainage, including runoff and erosion control measures:**

Our irrigation system is a closed loop. Each watering cycle produces approximately 5% runoff, which we capture and drain back into our watering reservoir. We then mix the runoff into a new watering solution. If runoff is inappropriate for reuse, it will be stored and disposed of offsite, according to appropriate environmental guidelines. No runoff is put into the ground onsite, so erosion is not a problem and the watershed is not compromised. In the future, we plan to treat runoff and use it to water an onsite garden after inert. We also follow all state and federal guidelines when disposing of IPM (Integrated Pest Management) waste products. See pages 11-



12 of the Operations Manual for additional details about our water and waste management practices.

**Detail of measures taken to ensure protection of watershed and nearby habitat:**

Our irrigation system is a closed loop. The watershed and any nearby habitats will be unaffected by our cultivation activities. See answer to the previous question, and also pages 11-12 of the Operations Manual for details about our water and waste management practices.

**Protocols for proper storage and use of fertilizers, pesticides, and other regulated products utilized:**

We strictly follow all protocols for proper storage and use of chemical materials at grow sites. See pages 14-15 of the Operations Manual for a list of sanitation chemicals, pesticides and fungicides that we use, as well as safety equipment and procedures.

Refer to attached MSDS sheets for protocols for storage and use of all fertilizers.

**Description of cultivation activities (e.g. outdoor, indoor, mixed light):**

This site is an indoor environment.

Our lighting equipment is double-ended, high pressure sodium fixtures. These are the most efficient fixtures on the market measured by photosynthetically active radiation per watt. Reference Cultivation section of the Operations Manual for precise wattage per ft<sup>2</sup> (pages 8-10).

We employ rigorous protocols for cultivation of mother plants and clones, as well as for promoting vegetative growth and flowering. We also use an IPM (Integrated Pest Management) plan that solves pest problems with minimal environmental impact. Energy usage per plant is carefully applied and monitored. For details, see pages 8-11 of the Operations Manual.

To further improve our cultivation practices, we have developed a working relationship with Chris Van Hook, the founder of the Clean Green Certified program. We are actively pursuing Clean Green certification.

**Processing Plan:**

We maintain a safe and comfortable environment for our process workers at all times. We also have strict guidelines for processing our cannabis.

Plants are harvested at peak ripeness and immediately transferred to a sanitized, climate-controlled drying and curing facility. During the 7-10 day drying period, temperature, humidity, and air circulation are carefully monitored. The drying room is equipped with air conditioners to maintain temperature, dehumidifiers, and fans for air circulation.

After curing, the product is transferred to our secure trimming location for additional processing. Each trimmer receives hands-on training from a supervisor, as outlined in our Trimmer's Guide. The Guide includes information about the anatomy of the cannabis plant, rules for preparing and organizing a trimming workspace, a detailed description of fine trimming processes and techniques, a list of quality control issues, grading and sorting criteria, and standards for cleanliness and discretion. A copy of this manual is attached, and is accessible to all our workers onsite at all times. Also, see page 10 of the Operations Manual for additional information.

After trimming, the product is assessed for quality. Grading procedures include analysis of smell quality and strength, a pass/fail humidity and cure test, quality of trim job, size, density, color, frost, medical effect (smoke and taste), and any imperfections. Batches are then rated according to an A-F grading scale (see page 11 of our attached Trimmer's Guide). CW Analytical then performs pesticide, contamination, mold, and mycotoxin testing on all products. A moisture meter is used to determine correct timing for tamper-proof packaging, and batches are packaged and distributed to dispensaries according to our vending process (see pages 17-20 of the Operations Manual).

**Schedule of activities during each month of the growing and harvesting season, including projected generator use:**

There is no generator onsite, so no generator use is projected.

A detailed timeline and description of all cultivation and harvesting procedures can be found on pages 8-10 of the Operations Manual.

**Security Plan:**

Currently, the property can only be accessed through a locked gate. Once inside the gate, the indoor grow has three layers of security before any cultivation area can be accessed—one lock on the barn, another on the mud room, and individual locks for each grow room. In addition to these existing security measures, we are developing a security plan that includes security codes and security equipment (cameras, alarms with motion sensors). We are currently waiting on a bid from Advanced Security to implement this plan. In collaboration with Atlas Engineering, we are designing a fire safety system with extinguishers and sprinklers, as well as an evacuation plan. These will adhere to all city codes and requirements. Additionally, all employees will be trained in CPR and first aid response, and will also be trained to recognize, report, and act appropriately in a fire emergency. See pages 12-13 of the Operations Manual for additional details.

**For indoor cultivation facilities:**

**Source of electrical power:**

Our power comes from the PG&E grid. We are currently enrolled in the PG&E Solar and Renewable Energy program (100% offset).

**Description of how it will meet energy requirements described in section 314-55.4.8.3 of the Zoning Code:**

We are currently enrolled in the PG&E Solar and Renewable Energy program (100% offset).

**List of attached items:**

1. The Northern Emeralds Operations Manual
2. A Trimmer's Guide to Medical Cannabis
3. Letters of Support from Associated Dispensaries
4. MSDS Sheets

# The Northern Emeralds Operations Manual

Updated 03/04/2016

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## Mission Statement

### **Mission Statement**

Northern Emeralds is committed to producing cannabis of the highest quality, with a special emphasis on consistency, customer service and enjoyment. We achieve this by maintaining a culture of excellence within our company, where each employee and practice is valued as a critical part of success. We strive to imbue our products with the best of ourselves, creating meaningful and lasting bonds with our customers, distributors and local communities. Our ethos of profitability prioritizes local production and service, gainful employment for all employees, resource sustainability and transparency about our methods and values. We firmly believe that responsible cannabis consumption makes a positive contribution to the health of individuals and communities, and aspire to facilitate this contribution with superior passion. Northern Emeralds is a vanguard of excellence in a flowering industry.

## Northern Emeralds Business Structure

EDC Inc is registered with the Secretary of State of California as a B-Corp

Northern Emeralds is registered with the Secretary of State of California as a Sole Proprietor DBA owned and operated by EDC Inc

EDC Inc EIN is: 47-4295834

Northern Emeralds' Board Consists of the following members: C.E.O, Secretary, and C.F.O. - CODY STROSS

Ownership: Cody Stross (100% ownership)

## Emergency Contacts

Main Office Line: 707-616-1368

Lawyer (Henry Wykowski): 415-788-4545

## Personnel Selection

Northern Emeralds enforces a stringent employment hiring process. The process includes an employment application, interview process, reference follow up, character assessment, background check, non-disclosure agreement, and employee code of conduct.

Pending implementation of AB266 and specific details about personnel selection, Northern Emeralds chooses its staff based on the criteria previously listed. However, if changes to the law through AB266 require additional screening processes, Northern Emeralds will have to abide and make changes to its screening process.

## Employee Roles

Cannabis Handling Staff  
**Gardeners**

Responsible for the propagation, cultivation, harvest, and cure of cannabis product produced in Northern Emeralds Gardens.

#### **Trimmers**

Responsible for the breakdown, manicuring, and tracking of raw cannabis material to trimmed, crumble, duff, and trash portions of cannabis flower.

#### **Processing Managers**

Responsible for the accurate account of manicured cannabis flowers as well as byproduct material and trash. Also responsible as the manager of the trimmers daily activities, scheduling, and reporting of all compliance information to whatever reporting entity is implemented by the County/City.

#### **Packers**

Responsible for the quality preparation of product for delivery to multiple accounts across the State of California.

#### **Delivery/Sales**

##### **Relationship Manager**

Responsible for building, securing, and mainting relationships with licensed collectives across the State of California. This includes introductions to new collectives, demonstrations of products, and customer service resolution.

#### **Management**

##### **Business Manager**

Responsible for managing the business aspects of Northern Emeralds' operations. This includes compliance reporting, human resource resolutions, community outreach, and customer service resolution.

##### **Product Specialist**

Responsible for the grading and quality assessment of cultivated cannabis. This individual is paramount to the quality control of cannabis product, the assessing of value, and strategic planning of genetic variation selected.

##### **Executive Officers**

Responsible for overall business strategic plan and implementation of policies.

#### **Business Manager Activities**

##### **Internal Document Creation**

The business manager's duty includes the creation of documents used in daily activities. This includes but is not limited to inventory management systems, employee activity logs, and accounting information. Any changes suggested to a document must be cleared with the business manager.

##### **Marketing and Promotion**

Marketing Duties may include:

- Flyers
- Advertisements

- Events
- Custom label materials
- Clothing and accessories
- Special Event Management
- Online Social Media

### Communication Specialist

The Business Manager acts as the communication specialist for the Northern Emeralds Team. The Manager must communicate with staff members, board members, dispensaries, patients, community members, regulators, and legal teams. The manager also acts as a reception to take incoming inquiries and resolve customer service issues.

### Multimedia Coordinator

The Business Manager is also in charge of maintaining the online presence of Northern Emeralds. This includes:

- Instagram
- Website
- Online Promotional Material

The multimedia coordinator is responsible for keeping information up to date, responding to customer reviews, and maintaining a presence online to compete with competition marketing. The multimedia coordinator also must keep abreast of new information regarding policies of online social media to ensure no violations are made resulting in a loss of profile or status.

### Legal Liaison

The Business Manager is the member of the staff who directly communicates with the legal team and communicates that information back to the team. They attend legal meetings, make requests to the legal teams, and answer questions to the community or regulators. Non-management staff members do not have the authority to act as agents of Northern Emeralds when it comes to legal activity.

### Human Resource Management

The Business Manager will resolve any issues amongst the staff members. They will also ensure that scheduling, vacations, and benefits are provided as necessary to employees. The Manager will also ensure that OSHA and workplace safety protocols are enforced.

### Payroll/ Benefits

The Business Manager will input and maintain payroll for employees. All employee benefits will be sourced, maintained, and presented to employees by the business manager. Once regulations change to allow for more banking activity, payroll will be set a bi-weekly timeframe and directly deposited into employees' bank accounts.

### Other Activities Delegated By Board Members

Any other activities delegated by specific staff or board members will be the duty of the Business Manager to complete.

### Product Specialist Activity

The product specialist is the employee designated to oversee the sourcing, procurement, grading, and quality control of medical cannabis products. In addition to these operational activities, the product specialist also prepares the product menu for collectives and prepares the packers for 101 deliveries.

### Executive Officers

The Executive Officers of Northern Emeralds are the decision makers of the company. These officers help design the marketing plan, reinforce the mission statement, and make financial decisions.

## Growing and Consulting Activities of Northern Emeralds

Northern Emeralds currently operates its business through three different departments. This departments are:

1. Northern Emeralds Medical Grows
2. Northern Emeralds Medical Distribution
3. Northern Emeralds Garden Consulting

## Northern Emeralds Medical Grows

The Internal Grows business sector of NE General plan

Goals statements

1. Employee safety and protection
  1. All company procedures are designed to maximize employee safety on the job and be in full compliance with all OSHA guidelines.
2. Resource efficiency and utilization
  1. All company procedures are designed to maximize environmental sustainability through responsible resource utilization. Water conservation, electrical efficiency, and optimal usage of space create a system where a minimum inputs create maximum production with minimal waste.

Cultivation

3. Mother plants: Used to maintain genetic stock and ample propagation material for flowering.
  1. Environmental controls:
    1. Temperature
    2. Humidity
    3. Air circulation
  2. Electrical: 215-323 watts per m<sup>2</sup>
  3. Plants: 4-6 per m<sup>2</sup>

4. Area: 10 - 15% of the size of flower space
  5. Light interval: 18 hrs / 24 hr day
  6. Time periods: Mothers can be maintained for up to 4-6 months.
4. Cloning: Exact genetic replication and propagation.
    1. Environmental controls:
      1. Temperature
      2. Humidity
      3. Air circulation
    2. 6 ft vertical racks with four shelves containing 280 clones per shelf. 216 watts of energy efficient t5 fixtures per vertical rack, containing 1,120 clones in an 8 - 10 ft<sup>2</sup> footprint.
      1. Thermostatically controlled heat mats maintaining optimal root zone temperatures.
      2. Light interval: 18 hrs / 24 hr day
      3. Time period: Cuttings will root in 10-20 days
      4. Transplant to growing medium.
5. Vegetative Growth: Non-flowering growth up to desired size for flowering.
    1. Environmental controls:
      1. Temperature
      2. Humidity
      3. CO<sub>2</sub> enrichment
      4. Air circulation
    2. Light interval: 18 hrs / 24hr day
    3. Area: No less than 66% the size of flowering space
    4. Plants: 11 - 16 plants per m<sup>2</sup>
    5. Electrical: 215 - 323 watts per m<sup>2</sup>
    6. Time period: 2 - 6 weeks, depending upon logistics of specific strain and space.
    7. Transplant to final container / growing medium.
6. Flowering: Production of flowers.
    1. Environmental controls:
      1. Temperature
      2. Humidity
      3. CO<sub>2</sub> enrichment
      4. Air circulation
    2. Light interval: 12 hrs per 24 hr day.
    3. Plants: 7 - 11 plants per m<sup>2</sup>
    4. Electrical: 428 - 535 watts per m<sup>2</sup>
    5. Irrigation:
      1. Frequency and duration: Determined by plant needs.
    2. Nutrient solution
  6. Time period: 7 - 10 weeks, depending on maturation as determined by microscope and analytical testing for peak potency.

## Post-cultivation/Harvesting

7. Plants are harvested at peak ripeness and immediately moved to sanitized climate-controlled drying and curing facility.
8. Environmentally controlled temperature, humidity, and air circulation.
9. 7 - 10 day drying interval.

### Processing:

10. Manicuring of flowers and management of byproducts and waste.
11. Safety: Processing is done at food-grade facility under controlled conditions.
12. Security: Takes place at monitored and locked location only accessible to employees.
13. Quality control monitoring devices:
  1. Moisture meter is used to determine correct time for final tamper-proof packaging.
  2. CW Analytical performs pesticide, contamination, mold, and mycotoxin testing on all products.

## Integrated Pest Management Plan

1. A holistic method of identifying and solving pest problems with a minimum of risk to people and the environment.
2. General guidelines
  1. Proper Identification of pests and problems
  2. Monitoring and assessing pest populations and damage
  3. Rules for when and how to use control methods
    1. Intention of control method
    2. Specificity of chemical solution to pest type
    3. Frequency of application
    4. Application method (atomizer, pump sprayer, irrigation, hand application). See section 2.1.7.
  4. Emphasis on preventing problems before they occur
  5. Effective management and use of control methods
    1. Biological controls: Using the natural predators of pests to control damage.
    2. Cultural controls: Growing systems that create unfavorable conditions for pests.
    3. Mechanical and physical controls: Physical removal and obstruction of entry; filters, traps.
    4. Chemical controls: Selected and used in a way that creates the least harm for people and the environment.
  6. Guidelines for using personal protective equipment.
    1. Training in handling and disposal methods for chemicals
    2. VOC respirator with full face and eye protection for all spray applications
    3. Full Tyvek coveralls with hood and booties
    4. Gloves
  7. Chemical application methods
    1. Atomizer

1. 360 degree coverage, top and bottom of leaf surface.
2. Rinse applicator and return to storage afterwards
2. Hand pump sprayer
3. Root drench
  1. Hand watering
  2. Irrigation system

## Employee and Labor Management

3. Training
  1. Standardized training for all positions within organization
  2. Continuing training to keep employees up to date on latest information
4. California Labor Law requirements
  1. All labor guidelines will be in full compliance with California Labor Law.
5. MJ Freeway
  1. Tracks production, profits, time records.
  2. Accountability and records: Keeps employees accountable by tracking output, time, and activity.
  3. Streamlines communication through organizational levels.
  4. Creates a feedback loop allowing for optimization of techniques and procedures.

## Resource Usage and Efficiency

6. Lighting
  1. Type: In each lighting application, the most efficient technology is used to provide the maximum usable light per watt of electricity.
  2. Light schedules: Are manipulated to achieve maximum efficiency with minimal waste.
  3. Monitoring: Employees are scheduled to inspect lights daily and turn off unnecessary usage.
7. Water
  1. Conscientious water usage plan: Using the minimum amount of water necessary.
  2. Irrigation: Designed to deliver exact water dosages to each specific plant, minimizing waste.
  3. Sealed environment: Allows up to 90% of irrigation water to be recovered through the air and reused. Reduces overall water use by up to 80%.
  4. Rainwater catchment plan
8. CO<sub>2</sub>
  1. Controlled injection of compressed CO<sub>2</sub> creates the optimal environment for plant production.
  2. Creates an increase in efficiency by raising output per watt of electricity used and per square foot of space.
  3. Monitoring devices prevent excess use of CO<sub>2</sub>.
  4. Safety training for CO<sub>2</sub> facilities.
9. Growing Medium
  1. Only sourced from sustainable materials.
  2. Sourced locally when possible.



3. Inert medium chosen for water retention capabilities, reducing water waste.
4. Minimum volume of material is needed, creating very little physical waste.
10. Square footage
  1. Maximizing efficiency of space
11. Environmental Controls
  1. Temperature
    1. Inverter driven AC units for peak cooling power efficiency
    2. Temperature monitors provide data that allow for most efficient usage of equipment.
  2. Humidity
    1. Humidistats and controllers allow for optimal plant environment, creating healthy plants and less waste.
  3. CO<sub>2</sub>
    1. See section 4.3
12. Carbon offsets and Energy Reduction Plan
  1. 100% power sourced from renewable solar power (PG&E Solar and Renewable Energies Plan)

## Waste Management

13. Water
14. Runoff
  1. Testing: Nutrient mineral runoff is tested to confirm that sewer water treatment will render it inert.
  2. Runoff is plumbed into city waste water.
15. Disposal of IPM waste products
  1. Following manufacturers instruction in dealing with waste products, complying with state and federal guidelines.
16. Green Waste Management
  1. Wood chipper: Waste stems are chipped into small pieces, bagged up, and delivered to city cannabis waste disposal.
  2. Growing medium and other materials to be taken for recycling at local Green Waste facility.
17. Recycling
  1. Recycling programs implemented for all materials that are eligible.
18. Trash
  1. Trash plan for all other materials in compliance with state and city laws.

## Security

19. Security policies
  1. Key and code distribution
    1. All buildings will have security apparatus in place that requires keys or codes for access.
    2. Keys and access codes will be distributed only to employees that have relevant tasks in those areas.
  2. Access and restricted areas
    1. No unsupervised access to non-employees.

20. Security equipment

*Waiting on bid from Advanced Security*

1. Cameras: Full monitoring and coverage of grounds, building interiors, and building exteriors, with recording.
2. Alarm Systems
  1. Motion detectors that trigger alarm
    1. Notifies employees and emergency services
  2. Key code system disables alarm
    1. Employees have individual key codes, to provide records of area access

21. Fire Safety Systems

1. Fire extinguishers / sprinklers
  1. Fire suppression systems and stations to be built to city code as determined by Atlas Engineering.
2. Evacuation plan / exit directions
  1. Designed to city code by Atlas Engineering
3. CPR and first aid response training for employees
4. Employee training for recognition, reporting, and action for fire emergencies.

Sanitation

Sanitation guidelines and checklists are to be provided to employees and posted in a conspicuous place.

22. Personal protective equipment to be used as laid out in MSDS guidelines.

23. Daily

1. Clean all work stations used
  1. Surfaces
  2. Floors
  3. Tools

24. Weekly

1. Empty trash bins
2. Vacuum/sweep/mop high traffic areas
3. Clean and refill sanitizing foot mat
4. Empty and clean shop vac
5. Sanitize other work areas

25. Monthly

1. Clean dehumidifier air filters
2. Clean AC air filters
3. Organize and clean storage racks
4. Clean garbage cans / clean or replace sanitation tools

26. Per cycle

1. Clean and sanitize walls
2. Sweep/vacuum floors, mop, and sanitize
3. Disassemble and sanitize circulatory fans
4. Disinfect air conditioner coils
5. Sterilize irrigation lines
6. Clean reservoir
7. Sanitize hoses and pumps

8. Clean and sanitize containers and trays
9. Repaint if necessary
27. Hygiene
  1. Showers required before entering work environments
  2. Clean and contaminate free clothing
  3. Clean and contaminate free shoes
    1. All shoes must go through sterilizing shoe mat upon entering facility
  4. Location-specific isolation suits and booties.

## Chemicals / MSDS

### 28. Chemicals

1. Sanitation chemicals
  1. Phisan 20
  2. Hydrogen Peroxide
  3. Isopropyl alcohol
  4. Sodium hypochlorite
2. Pesticide and fungicides
  1. Azamax (azadirachtin)
  2. Spinosad (monterey garden spray)
  3. OG Biowar Root Pack
  4. OG Biowar Foliar pack
  5. Green Cleaner
  6. Actinovate
  7. Botanigard
3. Fertilizers (All Heavy 16 Brand)
  1. Bud A/Bud B
  2. Veg A/Veg B
  3. Heavy Roots
  4. Heavy Prime
  5. Heavy Fire
  6. Heavy Finish
  7. Foliar Enhancer

### 29. Safety Equipment

1. Full face VOC respirator
2. Particulate masks
3. Eye protection
  1. Safety glasses
  2. UV glasses
4. Gloves
  1. Rubber
  2. Latex work gloves
5. Tyvek coveralls
6. Ear protection / ear plugs
7. UV Skin protection
8. Protective helmets in work zones

### 30. Safety Procedures

1. Re-entry Intervals: Follow manufacturer recommended re-entry intervals for each specific chemical application.
2. Lifting techniques: Instruction on proper lifting techniques to avoid injury.
3. Ladders: Instruction on proper usage and safety with ladders.
4. Electricity: Instruction on how identify and report electrical hazards. Contracted licensed electrician will be available to certify all facilities and eliminate hazards.
5. Sharp tools: Training on correct usage of tools with edges, proper storage procedures, and injury treatment.
6. Chemical Exposure
  1. Eye wash stations
  2. Hand wash stations
7. Report system for injury or chemical exposure

### Safety/Hygiene

Every employee of Northern Emeralds that handles a medicinal product will undergo a safety/hygiene course of a food grade handling equivalent. Once a medical cannabis certification program is available, the food grade handling certification will be replaced by the medical cannabis certification. Training will include safe handling of products, personal hygiene, safe storage environments, and safe temperatures. Any additional training required by the State of California will be intergraded and implemented.

## Northern Emeralds Medical Distribution

Northern Emeralds Medical Distribution department is responsible for matching up the needs of medical cannabis collectives in the State of California to specialized medical cannabis gardens In Humboldt County California, in compliance with Proposition 215 and SB 420.

### Medical Distribution Process

#### Membership Agreement

Each product line that Northern Emeralds procures from its patient members must agree to the terms and conditions of Northern Emeralds. Each patient must sign up for the Northern Emeralds Collective and agree to quality control standards. Each patient is also responsible for their own tax liability. An invoice is provided for every product procurement, and stored annually to refer to for tax purposes.

#### Medicine Procurement Plan

##### Step 1- Schedule appointment

##### Step 2- Quality Grading Procedure (10 step process graded on scale of 1-5)

- Smell Quality
- Smell Strength
- Cure- Pass Fail Humidity Test AND cure quality
- Trim
- Size (1<sup>st</sup>, 2<sup>nd</sup> tier)
- Density
- Color
- Frost
- Smoke and Taste (Medical Effect)
- Imperfections

Step 3- Pricing

Step 4- Agreement

Step 5- Payment

Step 6- Inventory Logging and labeling

Grading

Refer to grading sheet for step by step analysis of medicinal product. The grading sheet can be found on page 11 of our "Trimmer's Guide" (attached)

Pricing

*To be developed with changes to For Profit Status*

*Market Factors*

*Production Factors*

*Seasonal Factors*

*Lab Testing*

*Legal*

Agreement

After membership agreement, bud grading, and pricing have been discussed, an agreement is made between the patient and Northern Emeralds. The terms of the agreement are recorded on the purchase order and a receipt is provided to the patient.

Payment

If a payment on delivery is agreed upon, product remuneration will take place at the time the product is procured. If a consignment agreement is made, the terms and conditions of payment will be outline in the document provided to the patient.

Inventory Logging and Labeling

Northern Emeralds Staff will then take control of the products and enter the identifying pieces of information into the inventory management system. The inventory management system can be accessed through a cloud based server, password protected, by Northern Emeralds employees.

Information is taking from the grading sheet and inputted into the inventory tracking system. Important identifying information will include:

- Garden Source
- Strain
- Harvest Date
- Amounts
- Grading Score
- Lab Testing Results
- Batch #

Storage and Packaging Prep

Once inventory is entered into the inventory system, the physical product is then placed securely at the Northern Emeralds storage facility. Once the inventory enters the facility it is weigh again to check against

the bulk weight entered into the inventory logging system. The product is then labeled with all the identifying information on the bag.

## Product Allotment

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### Allotment

Once Northern Emeralds has enough product to produce a menu, that menu is presented to the collectives in need of Northern Emeralds products. The menu is sent out to member collectives twice a month, with a delivery schedule of every two weeks. Members are prioritized based off of their needs and past interactions.

After a collective has had a chance to review the menu, orders are made. Orders are then coordinated by the inventory manager, and packaging lists are created for the packaging staff.

### Packaging Orders

Packaging lists provided to the packaging staff are referred to against the inventory management system, and appropriate amounts are allotted from bulk holdings to meet each unique request. Each bulk item is weighed before packing to ensure the same amount entered into the system is the same amount allotted for the order.

Each package should contain:

- Labeled medical cannabis
- Packaging checklist
- A designated recipient at each collective
- Legal Transportation Documents

### Delivering Orders

The Northern Emeralds product shall be delivered to a designated recipient at each collective. The recipient will intake the product, review the packaging checklist, qualify the labeled medical cannabis as matching their order, and remunerate Northern Emeralds for their delivery.

If a consignment basis has been agreed and prearranged a consignment receipt will be provided. The delivery agent shall review the consignment receipt to ensure the timeframe details and totals match the delivery contract. All consignment receipts shall be provided to Accounts Receivable and added to financial statements.

### Accounts Receivable

After a collective has agreed to accept a Northern Emeralds product and agreement on payment terms is reached. These are either a consignment based payment with a specific payout date, or a payable on demand. In the event a consignment based payout is agreed upon, Northern Emeralds will receive a purchase order receipt with expected payout date. The consignment information is then immediately relayed to the Inventory manager, and inputted into the receivable calendar. If payment is satisfied at delivery the funds are incorporated back into the cash based accounting systems.

The accounts receivable manager is also responsible for aging the receivables and following up on their payment. Additional consignment deliveries are not to be made until receivables have been satisfied without prior approval of the General Manager.

# Vending Process to Collectives

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## Vending Process:

The following is a general outline of the Northern Emeralds vending process.

### Relationship Building

Relationships can develop in many different ways. The most common way is through face to face interactions with Northern Emeralds sales staff and inventory managers of collectives. Through a strong marketing campaign many buyers are made aware of the Northern Emeralds brand. In competitive markets like San Francisco, many buyers will try to provide similar products to their competition. This strong brand recognition is one of the main drivers in building new relationships. Other ways relationships are built is through cannabis events, outbound calling, online social media requests, and sample drops.

Once the conversation around the product has been started, it is Northern Emeralds' staff's duty to impress the inventory manager with superior customer services, quality communication, and prompt delivery of a high quality product. Even after delivery is made, relationship management is never done. Staff must also follow-up, resolve customer service issues, and help coordinate future deliveries.

### Vendor Profile

Once an interest in Northern Emeralds products has been established a unique vendor profile is created. This vendor profile includes:

- Business Name
- Tax ID
- Location
- Contact #1
- Contact #2
- Order History
- Order Forecast
- Customer Service Notes

An accurate vendor profile is imperative to delivering quality services. Having a well-established profile allows any employee to pick up where another left off through quality note taking and presentable information. Updates to the vendor profile should be noted with the Northern Emeralds employee's initials or employee ID to ensure quality tracking can be reinforced.

### Grower Agreement

After a vendor profile has been established a collective must sign a grower agreement, allotting a Northern Emeralds garden to be specifically allocated to that specific collective. A grower agreement must be signed to establish a relationship with Northern Emeralds.

### Transportation Agreement

Once the garden space has been allotted to the prospective collective a transportation agreement is signed, acknowledging that the prospective collective is expected the delivery from Northern Emeralds for the purpose of providing medical cannabis to collective patients. Transportation documents are required for every delivery and must be agreed upon to establish a relationship.

## Sourcing for Needs

Each collective will have unique needs for its patient clientele. After legal agreements have been signed and secured an inventory manager and Northern Emeralds agent will help match up the needs of the collective with the current medical cannabis selection available through Northern Emeralds Medical Grows department. This process is an intricate balance of product forecasting, coordinating, processing, and delivering on a specific timeline.

Certain products may not be available from the garden department at the exact time requested. It is the Northern Emeralds' staff's duty to record the specific requests of vendors into the vendor profile, and to make that information available to business management and garden staff to assist in the forecasting of future garden harvests. Sourcing for needs ensures that Northern Emeralds provides what the marketplace is desiring, at a competitive price, and reduces need for storage of undesired product.

## Schedule

As soon as specific products are matched to the needs of a collective they are put on the procurement/delivery schedule. The accuracy of the schedule is imperative for success and should be monitored in a dual control manner, ensuring at least two staff members confirm the information presented on the calendar to prevent overlapping schedule, for see conflicts, and prevent operational hurdles from poor planning.

This planning process allows for a broad overview of upcoming activity in regards to medium and long term planning, a detailed account of upcoming deliveries in the short term, and a tool to be used as a performance metric in the future. A well maintained delivery schedule will ensure efficient business operations, minimize customer service issues, and reduced losses.

## Transport

After vendor profiles are built, legal documentation satisfied, and product coordination is completed, Northern Emeralds Medical Distribution will provide the prearranged medical cannabis to the permitted collective in the timely manner arranged between the two parties. All product en route to the collective shall include:

- Strain Identification
- Batch Identification
- Weights and Measure
- Grower Agreement
- Collective Agreement
- Transports Documents
- Legal Documents

Upon arrival, the Northern Emeralds staff member will provide the product and documentation to the inventory manager. The inventory manager will review the manifest, ensure satisfaction of delivery, sign for package, and provide payment or consignment receipt for Northern Emeralds

## Showing

In some cases an inventory manager of a collective will want to do a showing or "viewing" of the product before they sign off on delivery. In the event a manager wants a showing the Northern Emeralds agent must ensure that product is handled in a way that the medical integrity is intact. Buyers should not be touching the medicine without gloves, soiled product should never be placed back into the bag, and no adulterants of smell or debris should be introduced to the bag. In the event that item is rejected and the quality of the



product is damaged, that batch shall not be reintroduced into the delivery channel until it has been assessed and graded again.

### Collective Storage

In the event that an inventory manager is unsatisfied with the quality of the product delivered, or there are disagreements in the terms of delivery, product may be rejected and need to be placed into collective storage until that batch can be reassessed, graded, packaged, and put back onto a delivery schedule. It is important management tracks the location of each product and that collective storage is only a temporary holding to ensure quality control and not a form of long term storage.

## Accounts Receivable

### Consignment Follow up

The consignment follow up includes the process of satisfying outstanding invoices for Northern Emeralds.

Consignment follow-up includes the following document:

- Delivery Contract (Strain, Weight, Price Agreement)

The Delivery Contract is a document to be used to ensure the amount of product delivered is the amount received, and that the price agreed for the consignment terms can be enforced upon payment.

### Accounting

All invoices will be settled by the Business Manager and recorded on the accounting system. Accounting will be prepared in a way that accounts receivable and accounts payable can be referenced in real time.

### Tax Assessments

Each transaction conducted by Northern Emeralds is assessed for tax liability and withheld for tax payments. Taxes will be paid quarterly and potentially monthly upon legal team conversations.

## Northern Emeralds Garden Consulting

### Goals of Garden Consulting

The garden consulting program is a patient/collective oriented service. Northern Emeralds targets two goals through its consulting service:

1. Increasing the quality of medical cannabis
2. Increasing the yield of medical cannabis harvested per run

### Overview of Consulting Process

The overall process of the garden consulting service includes:

1. Physical buildout/renovation of a patient or collective's garden operation
2. Professional Assessment of process and procedures
3. Nutrient input design
4. Lighting analysis
5. Environmental control analysis

6. Irrigation amplification
7. Optimal Harvest Process
8. Drying and Curing Consulting
9. Trimming Training
10. Proper Storage

### **Relationship Development**

Most relationships for garden consulting services come from a patient's need. Patients will seek out industry advice to improve or save their current garden operations. Once an initial introduction is made to a Northern Emeralds agent, and an assessment of needs is made. If a need is matched up to the services offered by Northern Emeralds, a patient profile will be developed.

A patient profile will include a patient's doctor's recommendation for cannabis (prop 215), collective agreements, patient's contact information, and references. After a profile is made a current performance assessment is recorded into the patient profile, a goal setting session is set, goals are recorded and agreed upon, and a contract is drawn up.

### **Contract Disclosure**

The contract is presented to a patient or collective, a document checklist is completed, date for commencement is set, lease agreement is signed, and finally contract is signed and filed.

### **Garden Assessment**

Items analyzed in a garden assessment include:

- Square footage available
- Amperage
- Zoning (Buffer Zones)
- Safety
- Privacy/Security
- Pest History
- Mold History
- Water Analysis
- Nutrient Review
- Electrical Account Type (Ag, Residential, Commercial)
- Health and Safety Regulation Review (Minors, improper electrical, illegal extractions, etc.)

### **Performance Related Review:**

- 12-24 Month Harvest Production Review
- Lab Test Results
- Yield per KW/h
- Yield per Sq Ft.
- Flowering and Vegetative Periods
- Nutrient Regime
- Soil Selection and Process
- Pest Management and Applications
- Environmental Fluctuations (Deltas)

- Gardener Interaction With Garden (hygiene, foot traffic, light leaks, contamination potentials)
- Strain Review
- Harvest Optimization
- Curing Room Environmental Controls
- Clean and Safe Equipment (mold free, etc)
- Storage Materials Used
- Proper Waste Management and Safe Water Discharge

### **Goal Setting**

The goal setting session allows Northern Emeralds and the patient gardener to set realistic, timely goals in regards to garden performance. These goals can be general or specific, whichever the patient prefers. Examples of goals can be increasing yields, increasing THC %, increasing CBD %, lowering costs, increasing efficiency, reducing stress and workload of gardener, increasing shelf life, increasing bag appeal, and more.

In addition to performance goals Northern Emeralds also creates medical cannabis network opportunities. These networks allow patients to provide their newly excessive harvests into a medical cannabis dispensary network.

### **Term Agreements**

After goals are set, terms are agreed upon. This is to ensure both parties are satisfied with the garden consulting service. Terms can be time specific, or activity specific. For example a 1-3 period can be agreed upon, or a number of "harvests" which may fluctuate in actual time. Terms are included in contract.

### **Construction**

When necessary, Northern Emeralds agents may need to do a physical buildout of new or improve existing garden spaces. When construction is required, Northern Emeralds will assume the front end costs of construction and only be remunerated for costs if goals are met. Construction costs and terms are to be included in finalized contract. Northern Emeralds will only use licensed contractors for buildouts.

### **Genetic Supply**

Once a garden system is established a set of optimal genetics is matched up to the optimal garden space to ensure garden success. Due to the exclusivity of the Northern Emeralds' Genetic Library, gardeners are leasing genetics from Northern Emeralds and agree not to propagate or distribute any genetics outside of the Northern Emeralds channels. Violation of terms and penalties are detailed in each contract. Performance guarantees of genetics are also included in the contract.

### **Growing To Harvest**

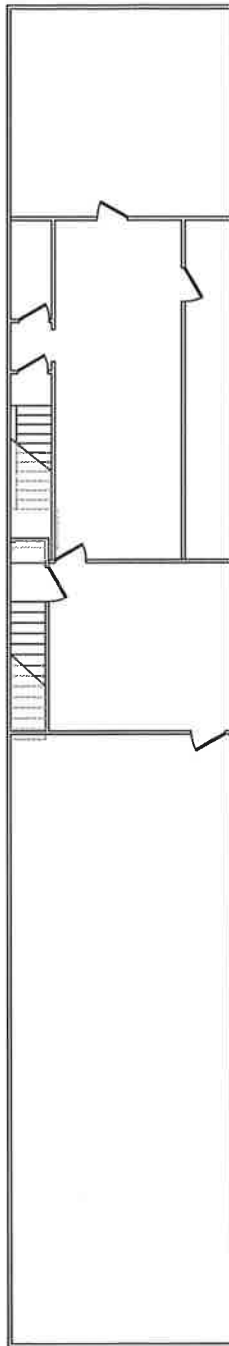
Northern Emeralds garden consulting services are available to the patient gardener throughout their entire process as needed. This reinforces the dedication to the patient, terms, and finished products. Contact information, documents, and troubleshooting scenarios are made available to patients as needed, until goals are able to be achieved without assistance.

## Regulation Caveat

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Regulation is rapidly changing. Northern Emeralds acknowledges that the company must be flexible and adapt to new regulations as they come into enforcement. Through active community participation, and involvement in the development of the cannabis industry, Northern Emeralds will position itself to be a leader in compliance and the industry benchmark for quality.





**CHRISTIE #1 BARN**  
5460 DOWS PRAIRIE RD. MCKINLEYVILLE, CA 95519  
APN 513-151-032

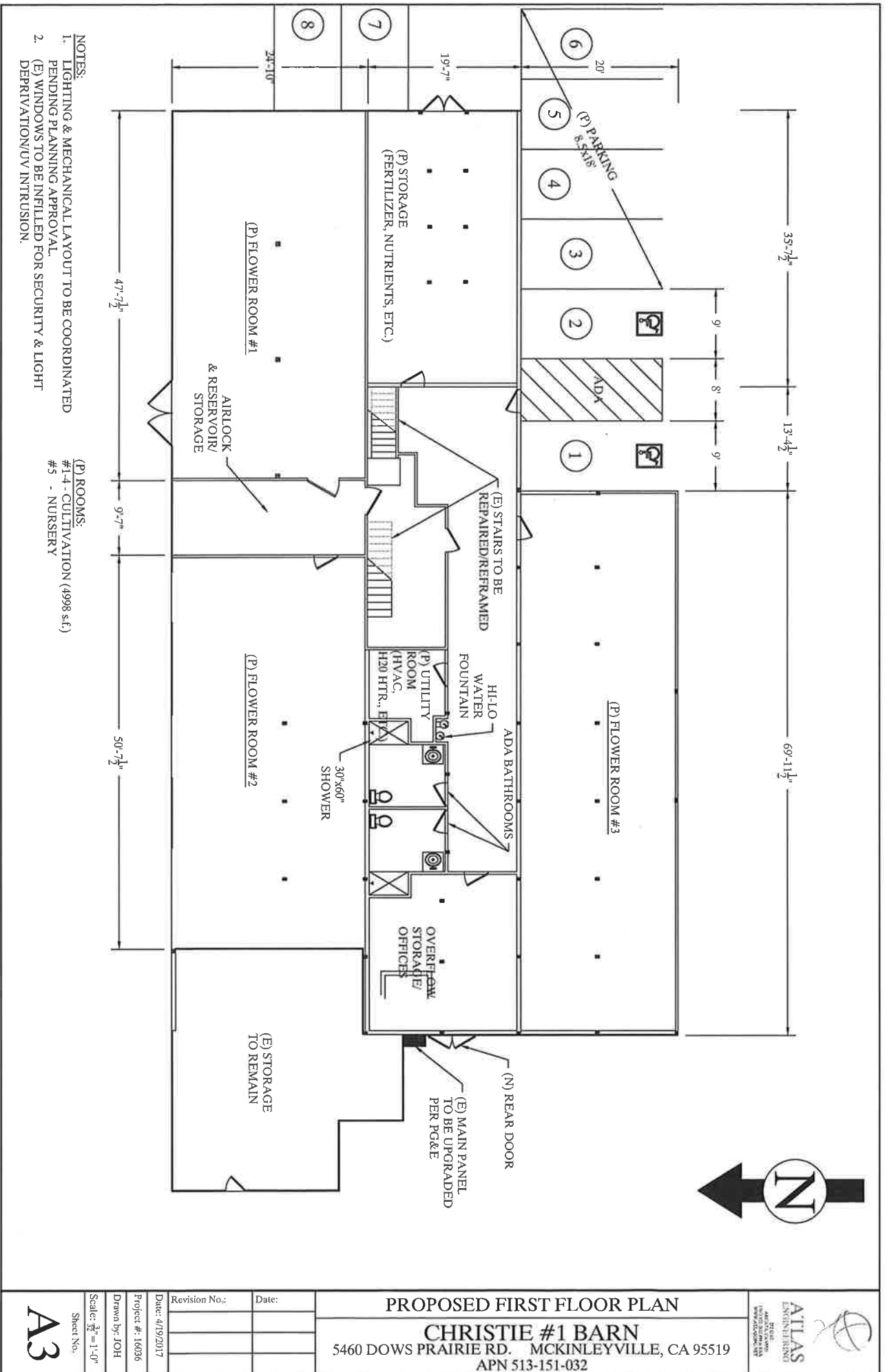


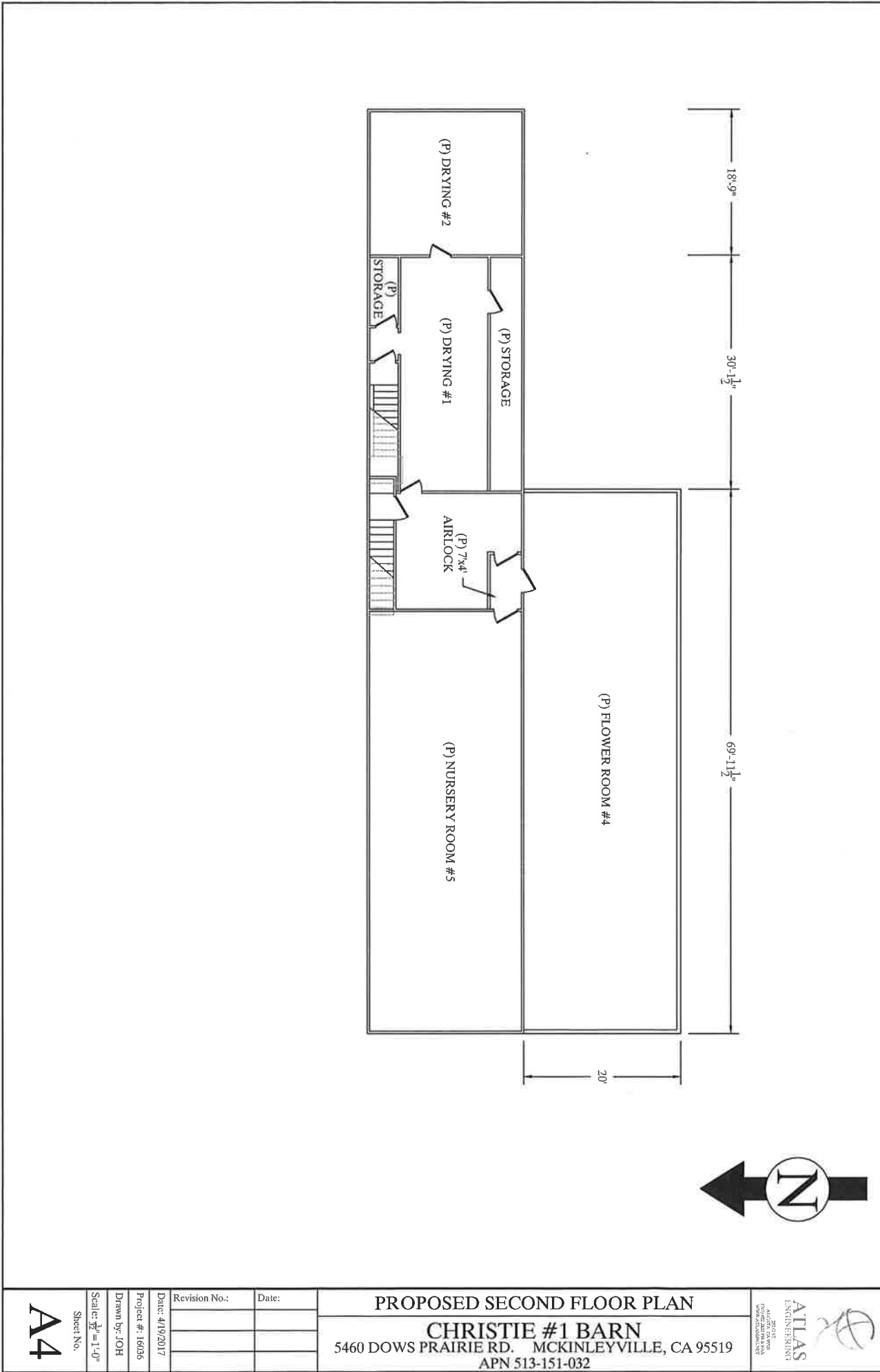
**ATLAS**  
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A2

Date:	
Revision No.:	
Date: 4/19/2017	
Project #: 160366	
Drawn by: JOH	
Scale: $\frac{3}{32}'' = 1'-0''$	
Sheet No.	







## ATTACHMENT 4

### Referral Agency Comments and Recommendation

Referral Agency	Response	Recommendation	On File
County Building Inspection Division	✓	Conditional Approval	✓
County Public Works, Land Use Division	✓	Conditional Approval	✓
County Division of Environmental Health	✓	Approval	✓
County Counsel	✓	Approval	✓
CALFIRE	✓	Standard input letter	✓
Blue Lake Rancheria	✓	Approval	✓

## **ATTACHMENT 5**

### **Letter from neighbor requesting a public hearing**

# William Weigle

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5096 Dows Prairie Road, McKinleyville, CA 95519 | 273-7572 | wjw912@gmail.com

Date 11/22/2016

Michael Richardson  
Humboldt County planning  
3015 H Street, Eureka, Ca 95501

**Dear Michael Richardson:**

I am requesting in writing a Public Hearing before approval on the proposed Special Permit for parcel number 513-151-032, case number SP 16-018

**Sincerely,**



**William Weigle**