



Cultivation and Operations Plan Old Goat Farms



Humboldt County Commercial Cannabis Land Use Ordinance

APN 531-011-005-000

15112 Pine Creek Road, Weichpec

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Prepared for:



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Preface

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

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

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

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I. Project Site

A. Location

Old Goat Farms is a fifty-four acre (54ac) parcel located at APN 531-011-005 and on French Camp Road. It is within the Bald Hills area and borders the Hoopa Valley Reservation (Hoopa) (Figure 1). The site is on the eastern slope of French Camp Ridge with an average elevation of two thousand nine hundred feet (2,900'). Slopes on the parcel vary between being fairly flat to twenty-five percent (25%) grade. Property driveway access is from Pine Creek Road.



Figure 1: Project Location

B. Hydrology

The parcel has a Class II ephemeral stream and multiple Class III intermittent streams which flow into Pine Creek whose headwaters are located outside of the Hoopa (Figure 2). There are multiple dry seep springs which are active during the wet season. Water from the parcel flows through the northwest corner of Hoopa for approximately two miles (2mi), which then exits Hoopa running through about one and one-half miles (1.5mi) of private land, and finally entering the Yurok Reservation for another one and one-half miles (1.5mi) to empty into mile forty (40) of the Klamath River.

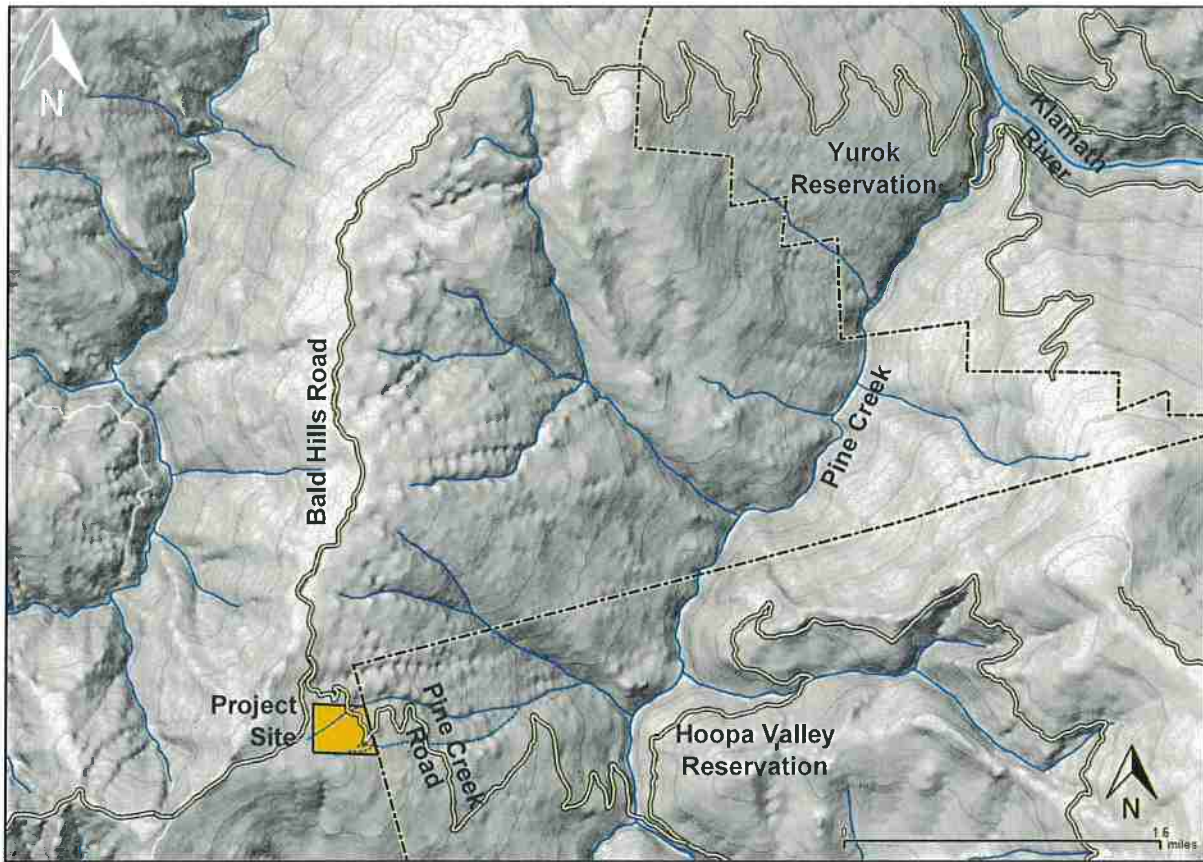


Figure 2: Site Hydrology

C. Utilities

The parcel lacks public utilities such as including water, wastewater, electrical, telephone, or cellular services due to its remoteness. provide. In the past water was provided via a diversion from a stream without a water right or additional permitting. The previous owner disposed of human waste via portable toilets maintained by a commercial service.

D. Zoning

The intent of Humboldt County Zoning Code is to implement the policies and elements of the Humboldt County General Plan. The Code is based upon Principle Zones and has further Combining Zones. All uses and development regulations of the Principal Zone apply in the Combining Zone, except, they are modified by the uses and regulations allowed within the Combining Zone regulations.

Old Goat Farms is generally Principally Zoned as Unclassified (U). Such zoning is utilized in unincorporated areas of the County which have not been sufficiently studied to justify any particular zoning use. U zone code determines overall development which allows the following principally permitted uses:

- One family dwelling.
- General agriculture.
- Rooming, and boarding of not more than two (2) persons.
- Manufactured home.
- All other uses not specified as a principal permitted uses may be allowed under a Use Permit.

E. Climate

Rain gauge records accessible via Western Regional Climate Center's (WRCC) are for Willow Creek Station (Figure 3). This gauge location provides a reasonable understanding of local climate. The area experiences on average approximately fifty-eight inches (51") of rain annually, can see extreme precipitation as high as eighty-three inches (83"), and as low as twenty-one inches (21") during a drought. Average temperature during the summer months of agricultural production is ninety-five degrees Fahrenheit (95°F) and can reach over one hundred fifteen degrees Fahrenheit (115°F) during extreme heat conditions.

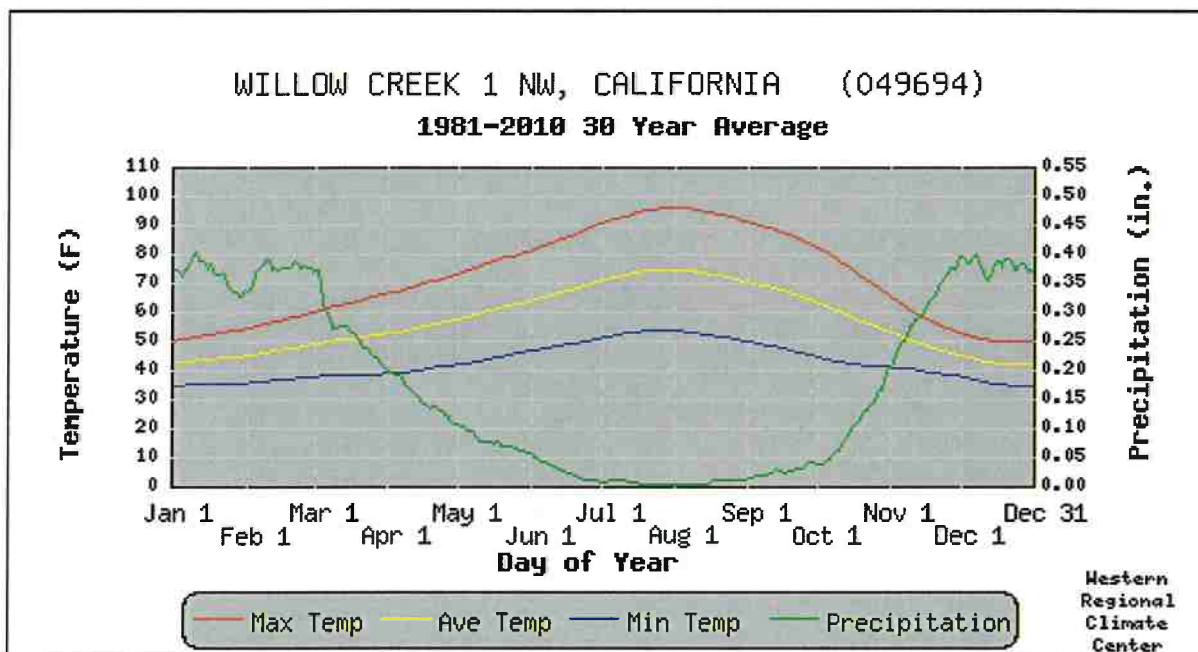


Figure 3: WRCC Willow Creek Station Climate Data

Source: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca9694>

F. Fisheries

There are many Species of Concern within the project site, some of which have state and federal protection, including Threatened and Endangered Species status. Operations can have an impact to these species at any time due to noncompliance with environmental regulations. These species can be vegetation, aquatic lifeforms, and terrestrial wildlife including the Northern Spotted Owl (*Strix occidentalis caurina*).

Species of most concern regarding operations and direct impacts are salmon found within local rivers and streams (Figure 4). These species require clean, cool, and flowing river conditions to survive. Local fisheries which are dependent upon water quality for spawning and rearing include:

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

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

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

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

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

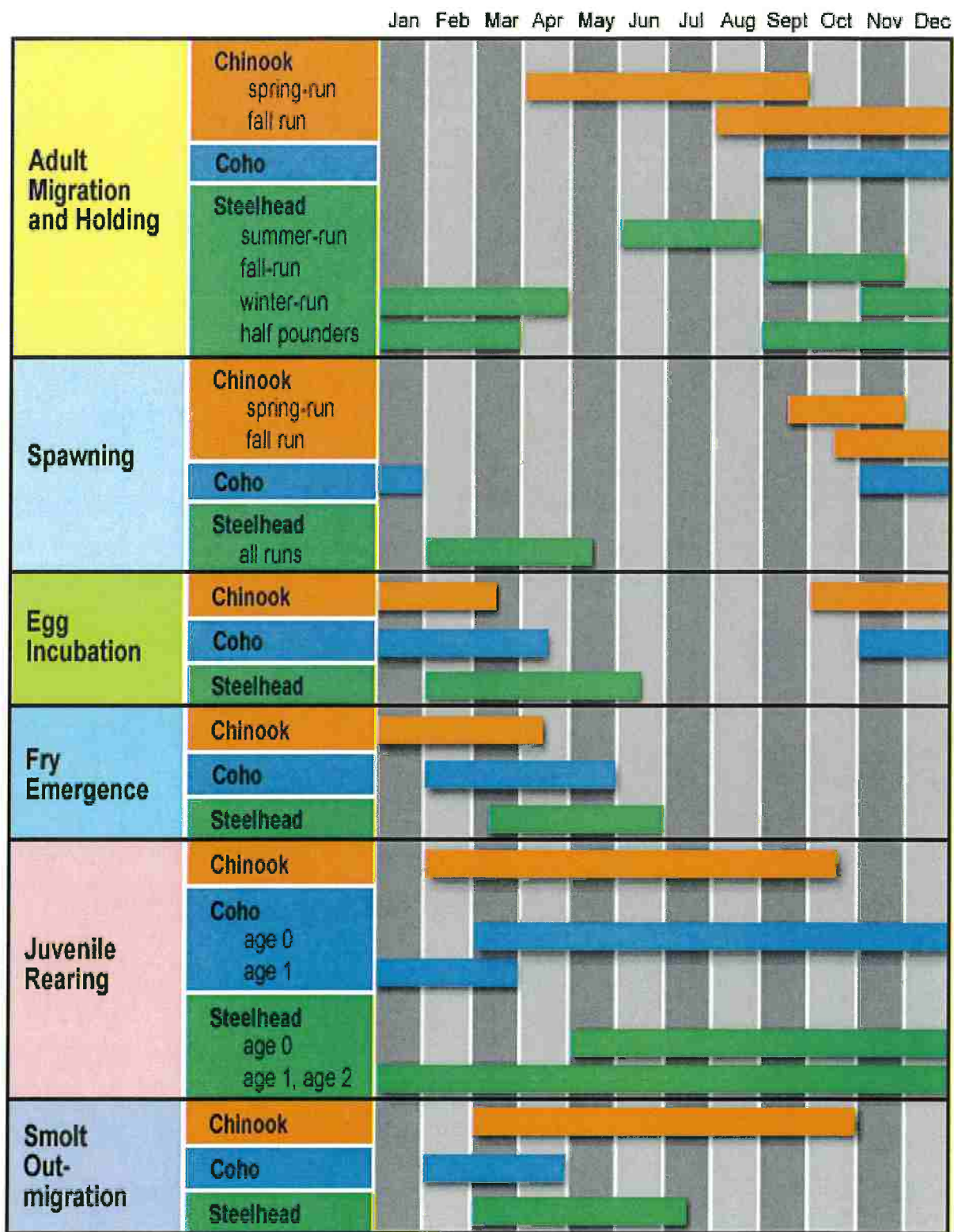


Figure 4: Northern California Salmon Life Cycle Calendar

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

G. Tribal Watershed Priorities

According to the Hoopa Valley Tribe (Tribe), Pine Creek has a total watershed area of thirty-one thousand four hundred twelve acres (31,412ac). Of this area, twelve thousand five hundred fifty-nine acres (12,559ac), equal to forty percent (40%) of the watershed, lies within the Reservation. There are twenty and one-half miles (20.5mi) of Class I and forty-two and one tenth miles (42.1mi) of Class II streams within the watershed supporting an anadromous fishery. The estimated water yield of the watershed is one hundred four thousand one hundred seventy-four acre feet (104,174ac-ft) of water equal to approximately thirty three billion nine hundred forty five million gallons (33,945,000,000gal) of water (Hoopa Valley Tribe 2008 pg. 17).

There are designated beneficial uses of Pine Creek by the Hoopa Tribe. These uses are based upon historical, existing, and proposed future uses (Hoopa Valley Tribe 2008 pg. 30). The uses include the following:

1. Historical
 - a. Ceremonial and cultural water use
2. Existing
 - a. Groundwater recharge
 - b. Cold freshwater habitat
 - c. Wildlife habitat
 - d. Threatened and endangered species habitat
 - e. Fish migration
 - f. Spawning habitat
 - g. Water recreation
3. Proposed
 - a. Municipal and domestic supply
 - b. Agricultural supply
 - c. Hydropower generation

The tribe monitors and claims jurisdiction on all water sources flowing through its reservation for subsistence and ceremonial purposes to ensure their ancestral tribal fishing rights protected by Federal law. Twelve (12) streams are actively monitored by the Tribe and ranked by salmon habitat priority. Pine Creek ranks third (3rd) overall within the Reservation (Hoopa Valley Tribe 2008 pg. 49).

The Tribe has objectives and policies to maintain beneficial uses for fishery water quality conditions of all surface waters flowing through the Reservation subject to the Tribe's Antidegradation Policy which is consistent with Section 316 of the Clean Water Act (Hoopa Valley Tribe 2008 pg. 64). Implementation of water quality objectives by the Tribe include continual monitoring, identification of nonpoint and point pollution sources, reduction and prevention of such pollutants, decreasing in stream diversions, implementation of water quality and discharge measures, and enforcement (Hoopa Valley Tribe 2008 pg. 69).

Further, Pine Creek is a tributary of the Klamath River, and flows into the Yurok Indian Reservation. Any waters that flow within the Yurok Territory are also claimed jurisdiction of the tribe, although, they defer water quality monitoring to the Hoopa Valley Tribe, who then defer to the State Water Board for enforcement (Yurok Tribe 2004 pg. 2). The Yurok Tribe has a dependency upon the quality of water entering their lands for cultural subsistence, and beneficial uses which they intend to enforce (Yurok Tribe 2004 pg. 28).

With these considerations in mind, Old Goat Farms shall be undertaking a good neighbor policy, and minimize any impacts to tribal resources. The intent shall be that overall operations are in compliance with State Water Quality Board's (SWB) General Waste Discharge Permitting Orders. To ensure compliance Timberland Resources Consultants (TRC), a 3rd party for the Water Board, has undertaken the Notice of Discharge, and in 2016 the NCRWQB originally issued WDID 11B16264CHUM which has since been superseded in 2019 by SWB WDID 1_12CC415459 for the parcel.

H. Historic Resources

The project site is located in the Weitchpec area. This area has been historically and is currently occupied by the Hupa and Yurok Tribes. Native Americans within Humboldt County in the past were violently exterminated by settlers and their lands taken through force. Many areas are historic with unknown sites of past activity including displacement, homicide, hunting or gathering, or other important tribal resources which may include the parcel. Any and all tribal resources which may be found would come under the jurisdiction of the Hupa Valley Tribe or the Yurok Tribe, both Federally Recognized Tribes, for the cataloging and preservation of historic resources.

II. Past Cultivation

A. Cultivation Area

The site that Old Goat Farms is located upon appears to have been used for cultivation related purposes since 2010 by the previous owner who had an illegal timber conversion. Prior to January 1, 2016 the site had thirty thousand square feet (30,000'²) of full sun outdoor and mixed light cannabis cultivation (Figure 5). According to Terraserver on July 16, 2015 there were two verifiable areas used:

1. Northern Site: A twenty-two thousand square feet (22,000'²) area with full-term in-ground cultivation; and,
2. Southern Site: A eight thousand square feet (8,000'²) mixed light cultivation in four (4) twenty by one hundred feet (20'x100') hoop-houses totaling two thousand square feet (2,000'²) each.



Figure 5: Past Cultivation
July 16, 2015 Terraserver

The following image sets are the same from Terraserver and zoomed in. The first image is the northern site and the second set is the southern site. These images establish the pre-existing cultivation area entitlement as required under Code.



Figure 6: Past Cultivation Northern Site
July 16, 2015 Terraserver



Figure 7: Past Cultivation Southern Site
July 16, 2015 Terraserver

B. Past Water Source

Cultivation was undertaken in the past on the parcel utilizing an illegal diversion from a Class II stream which flows into Pine Creek. This diversion was located at longitude 41.1535 and latitude -123.8155 (Figure 8). At that time the diversion was undertaken without a water right or appropriation submitted to the SWCB Division of Water Rights (DWR) nor was a §1602 Notification of Lake or Stream Alteration (§1602 LSA) submitted to DFW. An ***Initial State of Water Diversion and Use*** was filed with DWR on June 16, 2015 with **S025127** and again on July 12, 2016 with **S025554**, which was received on June 15, 2018 as **Certificate H100090** and June 19, 2017 with **Registration H500555**.



Figure 8: Past Water Source

C. Past Energy Source

Since the location is remote without utilities past cultivation, including mixed light, water diversion, and other buildings was power by onsite generators. These were small portable gasoline generators which are not commercial grade. As such, they were not in compliance with County Code and are an environmental hazard not meeting SWB Discharge Permitting requirements.

III. Operations Plan

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

A. Implementation Schedule

Implementation of this project shall be ongoing to maintain compliance with ever changing regulations from numerous agencies, including but not limited to, the County of Humboldt and the State of California. Fully meeting compliance with State laws is dependent upon a Humboldt County Cannabis Permit before any construction can occur under a Building Permit. The SWB Discharge Permit 1_12CC415459 issued September 6, 2019 and DFW LSA 1600-2018-0331-R1 issues March 18, 2019 both have five (5) year deadlines to meet compliance.

The intent is to complete compliance requirements within two-(2) years once a Humboldt County Cannabis Permit has been issued. Implementation shall occur during allowed construction and operational season under a six-month (6mo) Building Permit. There are different schedules allowed for construction related activities, which the State begins on April 1 with winterization November 15, whereas the County season starts April 15 with winterization by October 15.

All construction related activities shall be implemented under a Building Permit. Construction to meet compliance shall occur between April 15 and October 15. Compliance shall be undertaken immediately upon receipt of the Cannabis Permit and completed within two (2) years.

Table 1: Compliance Schedule					
Permit/License	Agency	Number(s)	Start	Compliance Schedule	Deadline
Discharge Permit	Northcoast Regional Water Quality Board	WDID 11B16264CHUM	July 12, 2016	4 Years April 1 to Nov 15	Aug 13, 2020 Terminated
Discharge Permit	CA State Water Board	WDID 1_12CC415459	Sept 6, 2019	5 Years	Sept 6, 2024
1600 LSA	CA Department Fish & Wildlife	DFW 1600-2017-0365-R1	Oct 24, 2017	5 Years April 1 to Nov 15	Oct 24, 2022
Well	Humboldt Department of Environmental Health	17/18-0249	Completed June 5, 2018	Monthly Recorded Metering	SWB Discharge Annual Reporting
Well	CA Department of Water Resources	WCR2018-004430	Completed June 5, 2018	Monthly Recorded Metering	SWB Discharge Annual Reporting
Water Right & Small Irrigation Use Registration	CA Department of Water Resources	Certificate H100090 June 15, 2018	Registration H500555 June 19, 2017	Abandoned	SWB Discharge Annual Reporting
Interim Cannabis Permit	Humboldt Planning	11033	Dec 5, 2017	Annual	Dec 31, 2018
Temporary License	CDFA CalCannabis	TAL18-0006836 & TAL18-0006943	Nov 7, 2018 & Nov 3, 2018	5 Months	Mar 7, 2019 & Mar 3, 2019
Provisional License	CDFA CalCannabis	PAL18-0002954 & PAL18-0002955	July 31, 2019	Annual	July 31, 2020
Track & Trace	METRC	N/A	Registration within 2 weeks of CDFA Provisional License	Annual	Aug 23, 2019
Cannabis Permit & CEQA	Humboldt Planning	TBD	TBD	2 Years	TBD
Building/Electrical/Ag Exempt Permits	Humboldt Building	TDB	Dependent upon Cannabis Permit	Construction April 15 to Oct 15	Awaiting Cannabis Permit Within 2yr
Septic Permit	Humboldt Department of Environmental Health	Installed Aug 24, 2017 Applied April 19, 2018	Dependent upon Cannabis Permit	Completed	Awaiting Cannabis Permit

B. Discovery of Human Remains or Archeological Resources

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

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

1. Human Remains

- a. Operations shall immediately cease in the advent of the discovery of human remains.
- b. The Humboldt County Sherriff Department shall be notified at (707) 445-7251.
- c. The Humboldt County Coroner shall be notified at (707) 445-7242.
- d. The Hoopa Valley Tribal Heritage Preservation Office shall be notified at (530)625-4284, ext.112.
- e. The Yurok Tribal Heritage Preservation Office shall be notified at (707)482-1350, ext.1309.
- f. The Humboldt County Planning Department shall be notified at (707) 445-7541.

2. Archeological Resources

- a. Operations shall immediately cease in the advent of the discovery of archeological resources, including but not limited to:
 - i. Obsidian or chert tools such as arrowheads, axes, knives, or spears.
 - ii. Obsidian or chert flakes.
 - iii. Stone tools.
 - iv. Groundstone artifacts.
 - v. Locally darkened midden soils.
- b. The Hoopa Valley Tribal Heritage Preservation Office shall be notified at (530)625-4284, ext.112.
- c. The Yurok Tribal Heritage Preservation Office shall be notified at (707)482-1350, ext.1309.
- d. The Humboldt County Planning Department shall be notified at (707) 445-7541.

The following actions have been taken:

1. ***A Cultural Resources Investigation was performed in early 2018 by a Licensed and Qualified Archaeologist, Mark Arsenault, with a finding of "No Significant Impact to Archeological Resources", and a copy of the report was accepted by the Humboldt County Planning Department on May 3, 2018.***

- a. The conclusion of the investigation found that the actions upon the parcel will not result in any adverse change to historical or archaeological resources (PRC 5020.1(q)).

C. Farm Operations

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

Old Goat Farms shall be employing persons for hire as allowable by law.

1. It is anticipated that operations shall consist of maximum four (4) employees, two (2) who are fulltime, and (2) seasonal part-time.
2. If ever over 20 employees are hired, they shall be allowed to unionize and negotiate a Labor Peace Agreement according to MCRSA §19322(a)(6).

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

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

1. State Water Board compliance with all measures identified within the ***Water Resources Protection Plan (WRPP)*** shall be implemented.
2. ***Permit to Operate*** a Tier 4 generator obtained from the Local Air District.
3. ***Track & Trace with METRC*** in accordance with the policies of County of Humboldt and State of California.
4. ***Private Applicator Certification*** shall be undertaken with the Humboldt County Agricultural Commissioner.
5. ***Potable water shall be provided by a permitted well.***
6. ***Human wastewater shall be managed by on-site permitted septic system with a restroom.***
7. ***Equipment required for the safe handling of cannabis shall readily be available on-site at all times.***
 - a. All personal equipment shall meet all local and state requirements while being OSHA compliant.
 - b. OSHA certified safety glasses (tinted and clear), hats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection shall be on-site and used as required.
 - c. Training in the use of personal protective equipment shall be undertaken on an annual basis.

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

D. Employee Safety Practices

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

1. Emergency action response planning.
 - a. Manager shall be trained and certified in basic CPR & 1st Aid.

- b. 1st Aid Kit Stations shall be provided within the cultivation areas, bathroom, and drying facility.
 - c. Employees with known allergies that could be a health concern in an agricultural setting shall inform management, and if require an EpiPen, shall carry said provisions with them at all times while on-site.
 - d. If feasible, a working phone connection or emergency call button connected to a monitored security system shall be put into use.
 - e. If feasible, emergency call buttons may or may not be placed within the greenhouses and drying facility.
 - f. Employees shall be provided with handheld communication devices with a secure channel for on-site use.
- 2. Employee accident reporting and investigation policies.
 - a. All accidents shall be reported to management.
 - b. Management shall investigate and keep written reports of accidents.
 - c. Reporting to authorities shall be accordingly to the requirements of law.
- 3. Fire prevention.
 - a. CalFire Fire Safe regulations (Title 14 Code of California Regulations: Division 1.5, Chapter 7, Subchapter 2, Articles 1-5) shall be met.
 - b. All employees shall be trained with fire safe methods and in the proper use of fire extinguishers.
 - c. Fire extinguishers shall be available in the cultivation areas and drying facility in the advent of an emergency.
 - d. Fire extinguishers shall be maintained and certified on an annual basis.
 - e. The dedicated water storage tank and nipple shall be inspected on an annual basis to ensure viability.
- 4. Hazard communication policies, including maintenance of material safety data sheets (MSDS).
 - a. Employees shall be trained in the proper handling of all hazardous materials, if any are ever used.
 - b. Employees shall be provided secure handheld communication devices for communication and emergencies.
 - c. MSDS of any applicable hazardous materials shall be posted visibly on-site at all times.
- 5. Materials handling policies.
 - a. Employees shall be trained on handling cannabis and other related materials on an annual basis.
- 6. Job hazard analyses.
 - a. Employees may be exposed to agricultural related risks and informed of such.
 - b. Within the first year of operations on-site risks shall be assessed by an independent expert to reduce job hazards within a risk management plan as applicable by law.
 - c. The risk management plan shall be implemented to reduce identified issues.
- 7. Personal protective equipment policies; including respiratory protection.

- a. Personal safety equipment for use such as OSHA certified safety glasses (tinted and clear), hardhats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection.
- b. Employees shall be trained in the use, expected to make use, and have ample access to personal protective equipment provided by Bear Butte Farms.
- c. Storage areas for personal safety equipment shall be provided.

E. Emergency Contacts

Old Goat Farms operations and drying facilities shall visibly post and maintain an emergency contact list which includes at a minimum:

- 1. Operation manager contact(s): TBD
 - a. Owner: Brian Dell (310)849-7980
- 2. Emergency responder contact(s):
 - a. EMERGENCY CALL 911
 - b. Nonemergency Sheriff: (707) 445-7251
 - c. Hoopa Fire Department: (530) 625-4366
 - d. City Ambulance: (707) 445-4907
- 3. Poison control contact(s):
 - a. EMERGENCY CALL 911
 - b. Poison Control Centers 1-800-222-1222

F. Schedule of Operations

Old Goat Farms operations shall cultivate thirty thousand square feet (30,000'²) of cultivation area. Methods employed include both full season outdoor and mixed light deprivation techniques which may vary slightly year to year dependent upon weather and strains used. Operations shall be powered by a Tier 4 Generator meeting all County and State requirements.

On-site propagation of a mother plant for clone development shall not occur. Rather, immature plants shall be bought from a licensed nursery and transported to the site. Weather dependent, mixed light cultivation greenhouse plantings shall occur anywhere from mid-May to early June for the first round of vegetation. Beginning in June the outdoor area shall be planted.

The mixed light shall be forced into flower and harvested late July to early August by pulling light blocking tarps over the greenhouses. At that time appurtenant nursery shall be used to hold immature plants as required by CDFA from a licensed nursery for the second round of mixed light cultivation. The second mixed light and the outdoor harvest shall occur anywhere from mid-September to late October. Drying shall occur on-site with raw product being sent to a licensed processor or manufacturer for further product development as allowed by law.

Table 2: (OD) Outdoor & (ML) Mixed Light Schedule of Activities						
Active Months	Both Vegetation	Outdoor Flowering	Mixed Light Flowering	Both Harvests	Both Drying	Water Usage
Jan						
Feb						
Mar						
Apr						
May	ML Planted					28,872gal
Jun	OD Planted		First			38,496gal
Jul	OD		Cycle	ML	ML	48,120gal
Aug	OD ML Planted	Variable				48,120gal
Sept		Strain	Second	OD	OD	33,679gal
Oct		Dependent	Cycle	ML & OD	ML & OD	22,055gal
Nov						
Dec						
Totals	3 Months	2 to 3 Months	4 Months	3 Harvests	3 Months	219,347gal

G. Power Source

The project shall be powered by an on-site EPA Tier 4 generator. A MQ Power Whisper Watt DCA-36SPX 40 KW diesel generator was installed by a licensed electrician during the summer of 2018 and currently powers operations. This generator is a self-contained unit rated for a seventy-nine-gallon (79gal) fuel capacity with a Sound Level of sixty-five decibel (65db) at full load at twenty-three feet (23'). Specs: www.mqpower.com/DCA20SPXU4F.html

All cultivation related activities shall be powered by this source. It is estimated that this generator shall be utilized for three hours per day (3hr/day) during the cultivation season for the illumination and ventilation of the mixed light and propagation greenhouses. The maximum greenhouse illumination shall be less than six watts per square foot (>6w/sqft).

The well is the only electrical component not connected to the MQ Power generator is the well. Due to distance the well is currently powered by a small Honda gas generator a few hours per day. Depending on feasibility the small generator shall be removed with the well connected by a licensed electrician to either the MQ Power generator or a small solar array with battery.

The project shall utilize the following Power Source:

1. *The MQ Power Whisper Watt DCA-36SPX 40 KW EPA Tier 4 diesel generator which was installed in 2018 and be brought up to Code.*
2. *The well shall be brought up to Code either by being connected to the Tier 4 generator or a separate solar panel system*

The following are compliance requirements for the Generator:

1. *Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall test, repair, and install*

all electrical connections and outlets to be utilized by commercial operations to ensure Code Compliance.

2. **Permit to Operate** the generator obtained from the Local Air District.
3. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

H. Irrigation Plan

Old Goat Farms recognizes the benefits of water conservation to operations, their neighbors in Hoopa, and the watershed. Water usage projections are based SWB estimates provided by TRC of seasonal water use is two hundred nineteen thousand three hundred forty-seven gallons (219,347gal). This water usage estimate is separate from any domestic uses. The proposed irrigation plan is as follows:

1. All requirements of the SWB Water Resources Protection Plan / Site Management Plan (WRRP/SMP) provided by TRC shall be implemented;
2. The well shall be metered, monitored, and recorded on a monthly basis as required by the SWB;
3. Cultivation and domestic water line divisions shall be metered;
4. Floats shall be installed on water tanks for automatic shutoff;
5. Cultivation shall utilize drip irrigation and irrigation shall be at an agronomic rate not to go beyond the root zone;
6. Smart pots shall be utilized for the outdoor area;
7. Enclosed beds shall be utilized within the mixed light greenhouses;
8. Soils utilized for cultivation shall not be exposed and instead shall be covered with a heavy layer of straw, mulch, cover crop, or ground cloth to reduce evaporation rates;
9. A detailed daily schedule of watering activities shall be developed and conspicuously posted on-site;
10. Watering of plants shall occur in the morning before 7am when the temperature is cooler and/or at night after 7pm as the rate of evaporation is slower; and,
11. Use of beneficial microbes such as compost teas and mycorrhizal inoculants for water conservation and nutrient reduction purposes as part of continual culturing of soils.

The following are compliance requirements for Operations:

1. ***All conditions shall be met for the State Water Quality Control Board Waiver of Waste Discharge Requirements under WDID 1_12CC415459 which has a deadline of September 6, 2024.***

I. Water Source

In the past cultivation was reliant upon the diversion from the Class II stream. On October 24, 2017 **DFW 1600-2017-0365-R1** was issued with the condition that the diversion be remediated. The diversion was registered on June 19, 2017 for a **Domestic Water Right** which was issued on June 15, 2018 under **DWR Registration H500555**

Certificate H100090. A Small Irrigation Use Registration with DWR on May 3, 2019 as required by CDFA for licensing purposes. **There is no intent to use the diversion for domestic or cultivation related purposes which has been disconnected and abandoned in favor of a well.**

In June 2018 a well was drilled under **HCDHHS Permit #17/18-0249** by Watson Well Drilling (C-57 #1014048) at latitude 41.153446 longitude -12.814993. A one hundred eighty feet (180') deep well struck water at a depth of fifty feet (50') within black shale with quartz with an output of sixty gallons per minute (60gpm). The casing was installed with blanks down to a depth of eighty feet (80'), with a combination of screens and blank the remaining length, and a sanitary installed with bentonite backfilled into the hole. The well was registered as complete on July 24, 2018 by **DWR WCR2018-004430**.

Well shall be utilize as only Water Source:

1. *The well shall be utilized for domestic and cultivation purposes which was completed under HCDHHS #17/18-0249 and DWR WCR2018-004430.*

Diversion shall not be utilized as a Water Source:

1. *The stream diversion shall not be used in the future whatsoever for domestic or cultivation uses which was disconnected in June 2018 and abandoned.*

The following are compliance requirements for the Water Sources:

1. *State Water Board WRRP/SMP compliance measures as identified shall be implemented.*
 - a. *A Water Meter was installed June 2018 during well completion.*
 - b. *The Water Meter shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.*
 - c. *Installation of Water Meter on the Outlet of the Water Tanks to the cultivation area which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.*
 - d. *Irrigation water shall be used at an agronomic rate consistent with the WRRP.*
2. *Standard Operating Procedures shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.*

J. Water Storage Plan

The well has been connected up to the existing nine (9) hard tanks less than five thousand gallons ($\leq 5,000$ gal) each of various sizes totaling twenty-three thousand four hundred fifty gallons (23,450gal). This amount of storage is sufficient to meet approximately ten (10) days during the middle of summer should a pump failure or other emergency occur. Additional storage shall be installed to increase capacity during an emergency, reduce the aquifer hydraulic head cone of depression, and add fire

protection. Project completion shall result in thirty-five thousand six hundred gallons (35,600gal) total water storage.

The project shall utilize the following minimum Water Storage:

1. ***Nine tanks pre-existing hard poly tanks totaling twenty-three thousand four hundred fifty gallons (23,450gal) of hard poly water storage tanks.***
2. ***Two (2) additional four thousand six hundred-gallon (4,600gal) tanks.***
3. ***Fire protection shall be met by a dedicated four thousand six hundred-gallon (4,600gal) meeting CalFire requirements.***

The following are compliance requirements for Water Storage:

1. ***Agricultural Exempt Permits*** shall be submitted to the Humboldt County Building Department for the water storage tanks.
2. ***State Water Board WRRP/SMP compliance measures as identified shall be implemented.***
 - a. ***Installation of a Water Meter on the Well*** which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.
 - b. ***Installation of Water Meter on the Outlet of the Water Tanks to the cultivation area*** which shall be monitored and recorded on a monthly basis with a copy kept on premises at all times.
 - c. ***Irrigation water shall be used at an agronomic rate consistent with the WRRP.***
3. ***A minimum of two thousand five hundred-gallon (2,500gal) water tank shall be dedicated for CalFire Fire Safe purposes and not connected to the Cultivation Area.***
 - a. Three inch (3") reflectorized blue dot shall be installed on an address sign upon the gates.
 - b. Three inch (3") reflectorized blue dot shall be installed upon the fire suppression tanks or fire hydrant.
 - c. A two and one-half inch (2½") or four and one-half inch (4½") N.H. male fitting for a fire house connection shall be made available on the fire water storage tank or a remote fire hydrant connection with said fitting at least eighteen inches (18") above grade
 - d. The placement of a tank with a hose fitting or a fire hydrant connection shall be between four feet (4') and twelve feet (12') from the roadway.
 - e. Tank and fire hydrant placement shall be at least fifty (50') from buildings.
 - f. Tank and fire hydrant placement shall be at least eight feet (8') from vegetation.
 - g. Fire suppression tanks shall be monitored for water level, topped off on a monthly basis if necessary, and a direct connection to the well with shut-off valve provided.
 - h. All fire hydrant connections shall be maintained for proper fit and function.

4. ***Standard Operating Procedures*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.

K. Wastewater

To meet the need of sanitary disposal of human waste a septic system was installed under a HCDHHS application filed April 19, 2018. The septic system and bathroom were installed due to commercial temporary toilet services not being available and a requirement for a restroom for employee use. The septic system was built to standards with fifty feet (50') perforated pipe (Figures 9 and 10) without a perk test undertaken. A restroom was constructed and connected to the system without a Building Permit. Completion of the Septic Permit is dependent upon a perk test which is scheduled for 2020 by AM Baird Engineering.



Figure 9 & 10: Septic Trench Length and Design

The project shall utilize the following Wastewater System:

1. ***The septic system which has been installed to service a restroom.***

The following are compliance requirements for Water Storage:

1. ***Peculation test*** undertaken by AM Baird Engineering in 2020.
2. ***Septic system permit shall be completed*** with the Humboldt County Department of Public Health & Human Services after completion of the Perk Test.

3. ***Building permits*** after the fact shall be submitted to the Humboldt County Building Department for the restroom.

L. Drying Plan

Old Goat Farms does not intend to trim or package cannabis products on-site utilizing employees. Operations shall be within the greenhouses with a dual season harvest utilizing full sun DEP and full sun outdoor area. The cultivation is intended to be for flowers which are dried, trimmed, and packaged or to be sent manufacturing or processor in bulk. The initial step of drying shall occur with on-site bucking within the cultivation area. Product shall be transported to a manufacturer or processor.

Bulk drying of product shall occur in two (2) areas. Outdoor harvest shall be dried within the first (1st) floor of one thousand one hundred twenty-five square feet (1,125'²) two-story central building which has electricity, but has an unfinished interior, lacks air conditioning or heating, and the second (2nd) floor is used for non-cannabis related storage. The mixed light harvest is currently dried within two (2) eight feet by sixteen feet (8'x16') steel containers which do not meet the needs of the operations and shall be replaced with a structure of approximately three thousand square feet (3,000'²).

All on-site roads shall meet Category 2 standards for employee use. Off-street parking shall be provided separate of the driveway emergency vehicle access areas with four (4) standard parking stalls. All development shall meet Humboldt County Building Code and California Codes.

The project shall utilize the following Drying Facilities:

1. ***The first (1st) floor of the unfinished one thousand one hundred twenty-five square feet (1,125'²) Ag Exempt stick building.***
2. ***A three thousand square feet (3,000'²) Ag Exempt stick building.***
3. ***Two (2) eight feet by sixteen feet (8'x16') Ag Exempt steel containers.***

The following are compliance requirements:

1. ***Building Permits shall be submitted to the Humboldt County Building Department for all construction, including the restroom with septic system, as determined by the Department.***
2. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall determine electrical needs and install the power system, switch box, conduit, and any other related electrical connections.***
3. ***Humboldt County and CalFire Category 2 road standards shall be met.***
4. ***Potable water shall be provided by the permitted well.***
5. ***Human wastewater shall be managed by on-site permitted septic system with a restroom.***
6. ***Track & Trace*** in accordance with the policies of County of Humboldt and State of California.
7. ***Cannabis Waste Management Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.

8. ***Drying and Packaging Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable County of Humboldt and State of California regulations. Additionally, this plan shall incorporate the following regulation required by CDFA:
 - a. Processed and dried cannabis procedure for weighing, packaging, labeling, and deposited in accordance with all applicable County of Humboldt and State of California requirements.
 - b. All work surfaces and equipment maintained in a clean and sanitary condition in accordance with all applicable County of Humboldt and State of California requirements.
 - c. Prevention practices against the contamination or growth of E. coli, mold, mildew, or other microbiological agent upon or within processed cannabis.
 - d. Nitrile gloves and paper facemasks shall be used at all times.
 - e. Hygiene policies for the use and maintenance of face and hand protection equipment in good operable condition.
 - f. Hands washing methods policies to minimize activities which may introduce contamination.
9. ***Transportation Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
 - a. Shall incorporate a road maintenance plan to maintain compliance with road standards required by Humboldt County, CalFire, and SWB.
10. ***Receiving and Inventory Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
11. ***Drying and Packaging Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
12. ***Security Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

M. Cultivation and Soils Plan

Old Goat Farms shall bring into full compliance a cultivation site equal to thirty thousand square feet (30,000'²) of full sun outdoor and mixed light cannabis cultivation. Activities shall be undertaken by employees. Operations shall be powered by a Tier 4 Generator.

Cannabis cultivated under license is intended for the adult recreational market for flower and extraction product. Trimming and packaging activities of product shall not occur on-site. Product shall either be minimally processed wet or dried plant material conveyed to an extraction facility or distributor for packaging. Operations shall meet all local and state regulatory requirements.

Cultivation shall consist of twenty-two thousand square feet (22,000'²) of outdoor and eight thousand square feet (8,000'²) of mixed light. The outdoor area shall be cultivated within air-pots at the past cultivation area. The mixed light shall occur within

four (4) two thousand square foot (2,000'²) greenhouses, with less than six watts per square feet ($\leq 6w/ft^2$) lighting, and cultivation occurring within raised beds (Figure 11).



Figure 11: Cultivation Area

Weather dependent, mixed light cultivation greenhouse planting shall occur anywhere from mid-May to early June for the first round of vegetation. Beginning in June the outdoor area shall be planted. The mixed light shall be forced into flower and harvested late July to early August by pulling light blocking tarps over the greenhouses. At that time appurtenant nursery shall be used to hold immature plants as required by CDFA from a licensed nursery for the second round of mixed light cultivation. The second mixed light and the outdoor harvest shall occur anywhere from mid-September to late October. Drying shall occur on-site with raw product being sent to a licensed processor or manufacturer for further product development as allowed by law.

Protection from overuse of inputs and reuse of these soils shall be a key component of operations. All farming shall be certified organic with mixing, tilling, and amending of soils occurring within the raised beds, air-pots, or compost area. All fertilizers shall be storage in designated areas as recommended by the manufacturer. Soils shall be reused, composted in a secure area with chipped cannabis waste, and no dumping off-site shall occur. Cover crops shall be utilized when not in cultivation for a month or more to reduce soils loss. Straw and other erosion control methods shall be placed on the ground surrounding the cultivation areas.

Old Goat Farms recognizes the benefits of water conservation and soils management to their business, community, watershed, and fishery. Environmentally friendly good neighbor policies shall be developed and implemented. These include:

1. All cultivation shall utilize agricultural soils in air-pots or raised beds.
2. All bare soils shall be covered soils with straw, ground cloth, or cover crop such as clover.
3. Operations shall be metered as required by the State Water Board.
4. Operations shall utilize drip irrigation controlled by a timer.
5. A detailed monthly schedule of watering activities shall be developed and conspicuously posted on-site.
6. Soils and vegetated matter shall be reused, composted on-site, and no dumping off-site shall occur.
7. Composting shall consist of a dedicated area and vegetated matter shall be chipped into an inconsumable humic mix.
8. Other methods of soil and plant moisture analysis may be implemented including the use of hygrometers, infrared cameras, and computerized sensors.

The project shall utilize the following Cultivation Area:

1. ***Full sun twenty-two thousand square feet (22,000'²) of outdoor cultivation area.***
2. ***Four (4) existing two thousand square feet (2,000'²) twenty feet by one hundred feet (20'x100') mixed light DEP greenhouses meeting the following:***
 - a. Wired by a Licensed Electrician under permit.
 - b. Not be air conditioned or actively heated.
 - c. Utilize electrical ventilation fans.
 - d. Utilize timers for fans.
 - e. Utilize Light Deprivation (DEP) covers.

The following are compliance requirements for the Cultivation Area:

1. ***Agricultural Exempt Permits*** shall be submitted to the Humboldt County Building Department for the greenhouses and fertilizer storage sheds.
2. ***Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install*** the generator, switch box, conduit, and outlets to be utilized by commercial operations.
3. ***State Water Board WRRP/SMP compliance measures as identified shall be implemented.***
4. ***Dark Sky Plan*** shall be developed and implemented.
 - a. Greenhouses shall utilize DEP covers.
 - b. Nursery lighting shall utilize timers.
 - c. A sunrise/sunset calendar shall be posted on-site.
 - d. Artificial lighting shall not be visible from outside of the at night after sunset or before sunrise.

- e. **Standard Operating Procedures that incorporate a Dark Sky Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all Humboldt County and State of California regulations.
- 5. **Track & Trace** in accordance with the policies of County of Humboldt and State of California.
 - a. Unique Identifier Designations (UID) are required for each mature plant.
 - b. A unique harvest batch name shall be created and associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
 - c. UIDs shall be attached to the main stem and placed in a position so it is visible within clear view standing next to a mature plant.
 - d. UIDs shall be kept free from dirt and debris.
 - e. UIDs are prohibited from being removed from the mature plant to which it was attached and assigned until the plant is harvested, destroyed or disposed.
 - f. Cannabis plants maintained outside of the designated Cultivation Area are prohibited from flowering. Should plants outside of the canopy area(s) begin to flower, a UID shall be applied, the plants shall be moved to the designated Cultivation Area without delay and reported in the Track-and-Trace system.
- 6. **Permit to Operate** the generator obtained from the Local Air District.
- 7. **Fertilizers stored in designated areas and maintained per manufacturer recommendations.**
- 8. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- 9. **Pesticide Management Plan** shall be developed shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- 10. **Private Applicator Certification** shall be undertaken with the Humboldt County Agricultural Commissioner and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- 11. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
- 12. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations.
- 13. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
- 14. **Drying and Packaging Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

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

N. Appurtenant Propagation Area

Mixed light cultivation shall be supported by an Appurtenant Propagation Area. This area shall occur separately where only immature plants are maintained outside of the cultivation area. A single one thousand six hundred eighty square feet (1,680²) greenhouse shall be utilized for these purposes.

The project shall utilize the following Appurtenant Propagation Area:

1. ***One thousand six hundred eighty square feet (1,680²) twenty feet by one hundred feet (14'x120') greenhouse meeting the following:***
 - a. Wired by a Licensed Electrician under permit.
 - b. May not be actively heated or air conditioned.
 - c. Utilize fans for ventilation.
 - d. Utilize low wattage efficiency lighting as feasible.
 - e. Utilize timers for lighting and fans.
 - f. Utilize a light blocking cover.

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

O. Roads

Operations shall require that roads are suitable for commercial agricultural use. Due to remoteness, during the seasonal peak access roads to the project site shall be utilized once per day by up to four (4) employees for work, and carpooling is encouraged. There may be one to two trips per week with a company vehicle for farm supplies and to dispose of solid waste. During the harvest there may be multiple trips per day by transport vans.

CalFire and Humboldt County prefer a Category 4 Road Standard which is twenty feet (20') wide, two (2) lane, on a slope less than sixteen percent (>16%), inside curve radius of fifty feet (50'), and forty feet (40') radius turnarounds or forty feet (40') Slip-T turnarounds. Should the physical landscape not allow for a two (2) lane road then Humboldt County and CalFire minimums standard are fourteen feet (14') wide with turnouts every four hundred feet (400'). On-site parking shall be required to occur in dedicated off-street locations and roadways clear at all times for emergency vehicle access.

The project shall utilize the following for Roads:

1. ***Baird Engineering undertook a road evaluation on May 15, 2018 stating necessary road repairs to meet Humboldt County and CalFire Category 2 minimum road standards.***
2. ***Any ROW entrances shall be to code requirements for approach and departure.***

3. *Gates shall have a three inch (3") red reflector on both sides.*
4. *A KNOX box located at the gate shall provide emergency vehicle access.*
5. *Emergency vehicle turnarounds shall be marked with white reflectors and remain clear at all times.*
6. *The driveway shall always be clear and accessible at all times.*
7. *All off-street parking shall be ten feet by twenty feet (10'x20') typical for truck parking.*

The following are compliance requirements for the Roads:

1. *Humboldt County and CalFire Category 2 minimum road standards shall be met.*
2. *Should grading of over fifty yards (<50yd) of material or be located on a slope greater than fifteen percent (<15%) then the following applies:*
 - a. *Grading plan which shall be designed by a licensed and qualified engineer.*
 - b. *Grading permit which shall be submitted to the Humboldt County Building Department.*
 - c. *Road construction shall be undertaken by a licensed and qualified contractor between April 15 to October 31.*
3. *State Water Board WRRP/SMP compliance measures as identified shall be implemented.*
4. *Transportation Plan* shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
 - b. *Shall incorporate a road maintenance plan to maintain compliance with road standards required by Humboldt County, CalFire, and SWB.*
5. *Receiving and Inventory Plan* shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
6. *Drying and Packaging Plan* shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
7. *Security Plan* shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

P. Solid and Organic Waste Plan

An Integrated Waste Management Plan to control cannabis and solid waste shall occur by implementation of a Cannabis Waste Management Plan (CWMP). Due to project site remoteness the CWMP shall focus on self-haul of solid waste and recycling. Cannabis waste shall be chipped on-site, composted in an approved manner, and utilize land disposal by mixing into cultivation soils. The State of California and Humboldt County require that the project be in compliance with the California Integrated Waste Management Act through the use of a CWMP.

All cannabis waste shall be stored in a secure waste receptacle, or secured area, and disposed of in accordance with local and state regulations, CERCC, and CWMP.

Cannabis waste shall be chipped and disposed of in a static aerated or windrow compost pile (Figure 12). Public access to the designated cannabis waste receptacle or area shall be strictly prohibited. All commercial solid waste shall be stored separately from cannabis waste in disposal bins secure from wildlife and watershed discharge, divided out from trash and recyclables, and disposed in accordance local and state regulations, CERCC, and CWMP. All hazardous waste regulated by the Integrated Pest Management Plan shall be dispose of properly utilizing protocols within that plan in compliance with all local and state regulations.

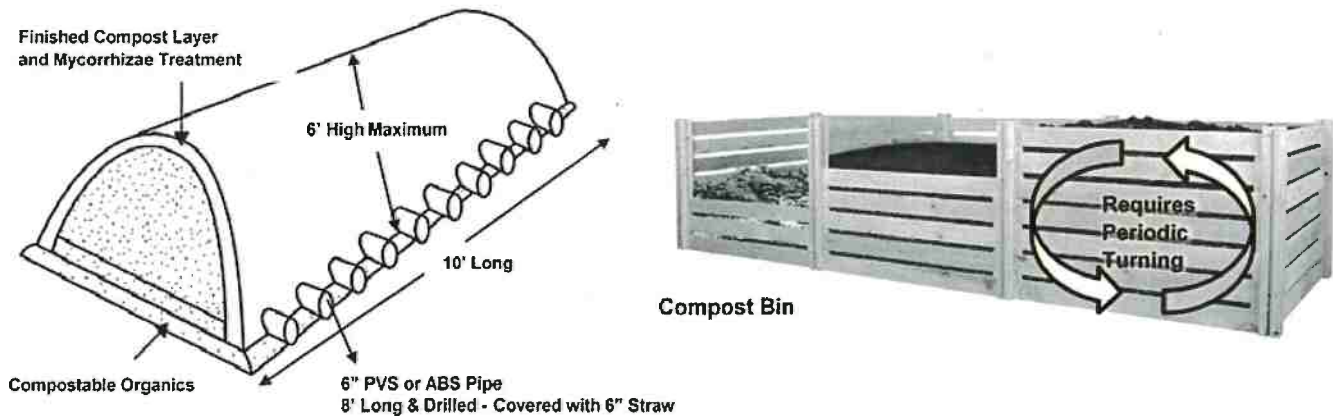


Figure 12: Static Aerated and Windrow Compost Piles Example

The following are compliance requirements for Solid Waste Management:

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

9. ***Drying and Packaging Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
10. ***Security Plan*** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

IV. Watershed Protection

A. Site Drainage

Old Goat Farms is located at the top of the French Camp ridgeline at twenty-nine hundred feet (2,900') in elevation with slopes between flat to twenty-five percent (25%) grade. The cultivation sites are on flats with less than five percent (>5%) slope. Multiple streams start upon the parcel, including a Class II stream on the north of the parcel, and Class III stream with multiple seasonal seep springs. These streams flow into Pine Creek which is a tributary of the Klamath River.

The outdoor air-pot cultivation area is located southeast of the Class II Stream on a flat with a slope to the east and south in the opposite direction of the stream. Below the cultivation area at the base of the slope is flat with a depression to allow accumulation and infiltration of discharge. The mixed light area is within one hundred feet (100') of a Class III stream, yet, is contained on a slightly north sloped flat with drainage away from the stream. It is unlikely that the cultivation areas shall have an impact on the stream if standard protocols for erosion and activities are followed per State Water Quality Control Board Waiver of Waste Discharge Requirements under WDID 1_12CC415459.

B. Runoff and Erosion Control Measures

Old Goat Farms recognizes the benefits of minimizing discharge to the watershed and anadromous fisheries. There is the chance that discharge could negatively affect local watersheds and anadromous fisheries without proper implementation of mitigation measures. The following erosion control measures shall be implemented:

1. All requirements of the WRRP shall be implemented;
2. All measures of the Water Resources Protection Plan shall be implemented;
3. Training by environmental/farm professionals to further develop internal policies to minimize impacts by from farm related activities.
4. All cultivation shall utilize raised beds in greenhouses and air-pots with soils composting occurring on-site.
5. Road surfaces shall be built to code requirements.
6. Cover crops such as native clover and wildflowers, straw, or ground cloth shall be utilized on all bare soils.
7. Internal policies and training to employees which shall minimize discharge from farm related activities.
8. All cultivation related activities shall cease and winter runoff protection measures shall be implemented by November 15th of each year.
9. No operations with minimal visitations shall occur during the rainy season between November 15th and May 1st of each year.

C. Watershed and Habitat Protection

Old Goat Farms shall be utilizing the following to ensure protection of the watershed and nearby habitat:

1. All requirements of the WRRP shall be implemented.
2. Internal policies and training to employees that shall minimize farm related activities impacts to the watershed.
3. Training by environmental and farm professionals to further develop internal policies to minimize impacts by from farm related activities.
4. Grading of the road and culvert crossings that meets CalFire and State Water Board requirements.
5. Farming shall be certified organic.
6. Reuse of organic wastes such as soils and vegetation through contained composting.
7. Tier 4 generator shall be less than sixty decibels (60db) from one hundred feet (100').
8. Secondary fuel containment for the proposed fuel tank and generator.
9. Trash area that shall be secured from wildlife and emptied on a regular basis.
10. All enclosures shall have locking doors.
11. A locked six-foot (6') perimeter fence may be installed around the cultivation area with greenhouses which shall have doors to minimize wildlife exposure.
12. Compost shall be covered and contained.
13. Cover crops shall be utilized on exposed cultivation soils during the winter.
14. Erosion protection measures, such as straw, mulch, mats, and planting of perennial grasses or native wildflowers around the cultivation areas.

D. Soil Management and/or Permaculture Methods.

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

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

V. Fertilizers, Pesticides, or Other Regulated Products

A. Storage Protocols

Old Goat Farms intends to be a certified organic farm. Operations shall not be using regulated products, such as pesticides or herbicides. The following are fertilizer storage protocols:

1. All requirements of the WRRP shall be implemented.
2. Storage of all fertilizers or other regulated and nonregulated organic products shall occur in a dedicated shed.
3. Products shall be stored according to manufacturer requirements.
4. Dedicated shelf and floor space for products shall be provided.
5. Clean-up and containment protocols shall be developed and implemented.
6. Clean-up and containment equipment shall be maintained in good operating condition and be on-site at all times.
7. Employees shall be trained in safe handling practices and protocols for using clean-up and containment equipment.

B. Fertilizers and Amendments Utilized

Old Goat Farms shall be utilizing products that may contain the following certified organic amendments and fertilizers (Table 3).

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

C. Pesticides

Old Goat Farms intends to be an organic farm that utilizes only certified organic products, though, there may be situations requiring the potential use of any the following agriculturally exempt products (Table 4).

Table 4: Legal Pest Management Practices for Marijuana Growers in California	
Active Ingredient	Pest or Disease
Azadirachtin	Aphids, Whiteflies, Fungus Gnats, Leafminers, Cutworms
Bacillus subtilis QST	Root Diseases, Powdery Mildew
Bacillus thuringiensis subsp. aizawai or kurstaki	Moth Larvae (E.G., Cutworms, Budworms, Borer)
Bacillus thuringiensis subsp. Israelensis	Fly Larvae (E.G., Fungus Gnats)
Beauveria bassiana	Whiteflies, Aphids, Thrips
Cinnamon oil	Whiteflies
Gliocladium virens	Root Diseases
Horticultural Oils (Petroleum Oil)	Mites, Aphids, Whiteflies, Thrips; Powdery Mildew
Insecticidal Soaps (Potassium Salts of Fatty Acids)	Aphids, Whiteflies, Cutworms, Budworms
Iron phosphate, sodium ferric EDTA	Slugs And Snails
Neem Oil	Mites; Powdery Mildew
Potassium bicarbonate; sodium bicarbonate	Powdery Mildew
Predatory nematodes	Fungus Gnats
Rosemary + peppermint essential oils	Whiteflies
Sulfur	Mites, Flea Beetles
Trichoderma harzianum	Root Diseases
Active ingredients that are exempt from residue tolerance requirements and either exempt from registration requirements or registered for a use broad enough to include use on marijuana. http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/cannabis_enfrmnt/pest_mgmt_practices.pdf	

VI. Operations and Safety Practices

A. Commercial Operations

Old Goat Farms is an “agricultural employer”, as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with §1140) of Division 2 of the Labor Code, to the extent not prohibited by law. Operations shall be employing persons for hire as allowable by law.

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

Old Goat Farms shall comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

At all times, employees shall have access to safe drinking water, toilets, and handwashing facilities that comply with all applicable federal, state, and local laws and regulations. On site-housing provided to employees shall not be provided.

B. Employee Safety Practices

Old Goat Farms operations and drying operations shall implement safety protocols to protect the health and safety of its employees. All employees shall be provided with adequate safety training relevant to their specific job functions. Further, safety needs of employees shall be a priority and implemented to the best of operational abilities.

1. Drinking water and wastewater
 - a. Potable water shall be provided from off-site bottle or cooler water.
 - b. A restroom connected to a septic system.
2. Emergency action response planning.
 - a. Training and certification in basic CPR & 1st Aid.
 - b. A CPR & 1st Aid Kit Station shall be provided within the drying facilities.
 - c. An emergency response plan shall be designed and implemented.
 - d. A monitored security and active video camera system may be installed.
3. Fire prevention.
 - a. Fire suppression tanks shall be monitored for water level and topped off on a monthly basis if necessary.
 - b. All fire hydrant connections shall be maintained for proper fit and function.
 - c. Smoke detectors shall be installed and may be connected with a monitored security system.
 - d. The appurtenant drying facilities shall have at a minimum one (1) dry chemical fire extinguishers with a twenty-pound (20lb) capacity in each building.
 - e. Fire extinguishers may also be installed within convenient locations accessible during working hours.
 - f. Fire extinguishers shall be maintained and certified on an annual basis.
4. Hazard communication policies, including maintenance of material safety data sheets (MSDS).
 - a. Pesticide Management Plan shall be developed.
 - b. Private Applicator Certification and a written copy of the plan and certification shall be on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
 - c. MSDS of all pesticides used shall be on premises at all times.
 - d. A pesticides management plan shall be on premises at all times.
 - e. Training in the proper handling of all hazardous materials, if any are ever used.
 - f. If any regulated substances are ever used, MSDS of any applicable hazardous materials shall be posted visibly on-site at all times.
5. Materials handling policies.
 - a. Training in the handling of cannabis and other related on-site materials shall occur on an annual basis.
 - b. All Track and Trace requirements shall be implemented.
 - c. A transportation plan shall be developed and implemented.
 - d. Standard Operating Procedures shall be developed and implemented.
6. Job hazard analyses.

- a. Risks assessment audit shall be implemented and activities modified to reduce job hazards.
- 7. Personal protective equipment policies; including respiratory protection.
 - a. Certified safety glasses (tinted and clear), hats, disposable and reusable gloves, disposable face masks, and filtered respiratory protection may be on-site and used.
 - b. Training in the use, expectations, and access to personal protective equipment.

VII. Processing Practices and Plan for Drying Activities

Old Goat Farms shall utilize up to four (4) employees who shall not live on-site. A compliant restroom shall be within four hundred feet (400') of the area of operations with showers installed and connected to the installed septic system which is capable of handling use. There is also break area with filtered potable water from the well for employee use.

A. Drying Practices

Old Goat Farms shall implement and practice the following Drying Practices on-site at all times:

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

B. Drying Plan

Minimal drying shall occur on-site, though, trimming and packaging will not be undertaken, as product is intended to be transported to a manufacturer or processor.

- 1. Harvesting cannabis twice (2) a year utilizing employees.
- 2. Drying of the harvested cannabis shall occur in the drying facilities.
- 3. Bucking of vegetative leaf for compost use shall occur within the cultivation areas.
- 4. Further processing shall occur off-site, as allowable under California and Humboldt County law, which will consist of either or both:
 - a. Sending untrimmed cannabis to a licensed processor under contract; and/or,
 - b. Sold to a licensed manufacturer as raw product in bulk.

C. Parking and Road Usage

- 1. The entrance shall be engineered according to code requirements for approach and departure.
- 2. The driveway shall be at a minimum of ten feet (10') wide, with two feet (2') shoulders, graveled, and culverted.
- 3. There shall be a total of four (4) standard sized parking stalls.
- 4. Employees shall be encouraged to carpool to the site when possible.

VIII. Security Plan

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

The following are Security Measures:

- A. Operations shall be secured behind a gated road with KNOX Box access.
- B. There may be a fence at least six feet (6') in height with a locking gate utilizing a commercial grade lock around the cultivations areas.
 - 1. Fencing over six feet (>6') shall require a Humboldt County Building Permit.
- C. Armed security personnel may be hired, as allowable by State law, who shall possess a valid Guard Card and be compliant with the California Department of Consumer Affairs.
- D. Internet monitored security and fire system may be installed, if feasible, and accessible only to permitted individuals on the premises.
- E. Digital video surveillance system may be installed, and if feasible, with 1280×720 resolution connected through the internet 24/7 to a licensed alarm monitoring company.
- F. Passive audible trespasser alarm system may be installed.
- G. Cameras may be installed.
- H. Locks shall be installed.
 - 1. Commercial-grade, non-residential door locks at all points of entry and exit.
 - 2. It is recommended that alarmed lock systems be considered to ensure restricted access.

The following are compliance requirements:

- A. **Humboldt County and CalFire Category 2 road standards shall be met.**
- B. **Electrical Permit shall be submitted to the Humboldt County Building Department by a Licensed Electrician who shall install** the power system, switch box, conduit, and any other related electrical connections.
- C. **Track & Trace** in accordance with the policies of County of Humboldt and State of California.
- D. **Cannabis Waste Management Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable Humboldt County and State of California regulations.
- E. **Standard Operating Procedures** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.
- F. **Transportation Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all State of California regulations;
- G. **Receiving and Inventory Plan** shall be developed, implemented, and a written copy on premises at all times in accordance with all applicable State of California regulations.

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

IX. References

- Hoopa Valley Tribe. 2008. *Hoopa Valley Indian Reservation: Water Quality Control Plan*. February 14. Hoopa Valley Tribal Environmental Protection Agency; Hoopa, CA. <https://www.epa.gov/sites/production/files/2014-12/documents/hoopa-valley-tribe.pdf> (accessed July 20, 2017)
- WRRC. 2017. *Willow Creek 1 NW, California (049694) Period of Record Monthly Climate Summary - Period of Record: 09/28/1968 To 06/09/2016*. Western Regional Climate Center; Reno, NV. <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca9694> (accessed July 15, 2017)
- Yurok. 2004. *Water Quality Control Plan for the Yurok Indian Reservation*. August. Yurok Tribe Environmental Program; Klamath, CA. www.yuroktribe.org/departments/forestry/.../WaterQualityControlPlan8-24-04.pdf (accessed July 23, 2017)